

**City of Gig Harbor
Americans With Disabilities Act (ADA)
Self-Evaluation and Transition Plan
for the Public Right-of-Way**



Gig Harbor, WA

December 2021

Prepared by



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

ADA/504 Coordinator

The ADA/504 Coordinator is responsible for responding to grievances, complaints and other alleged ADA discrimination concerns, as well providing materials in alternative formats. Jeff Langhelm, Public Works Director, is the City of Gig Harbor's ADA/504 Coordinator and can be contacted at:

Phone: (253) 851-8136

Washington Relay System: 7-1-1

E-mail: ADACoordinator@gigharborwa.gov

Mail: 3510 Grandview Street, Gig Harbor, WA 98335

Acknowledgements

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

Gig Harbor City Council

Kit Kuhn, Mayor

Jeni Woock, Council Member Position 1

Bob Himes, Council Member Position 2

Jim Franich, Council Member Position 3

Tracie Markley, Council Member Position 4

Robyn Denson, Council Member Position 5

Le Rodenberg, Council Member Position 6

Spencer Abersold, Council Member Position 7

City of Gig Harbor Project Team

Trent Ward, City Engineer

Aaron Hulst, Senior Engineer/Project Manager

Maureen Whitaker, Executive Assistant

Mike Simmons, GIS Coordinator

Jeff Langhelm, ADA/504 Coordinator



Consultant Team - Transportation Solutions, Inc.

Victor Salemann, Principal

Kirk Harris, Project Manager

Jennifer Salemann, Planner



Table of Contents

A. Introduction & Legal Requirements	9
A.1 Legal Precedent.....	9
A.2 Scope of ADA Transition Plan	10
A.3 Organization of Document.....	11
B. Administrative Policies and Procedures	12
B.1 Official Responsible to Implement the ADA Transition Plan	12
B.2 ADA/504 Coordinator	12
B.3 Public Notice of ADA Provisions.....	13
B.4 ADA Grievance Procedure.....	13
B.5 Accessible Pedestrian Signal (APS) Policy	13
C. Public Right-of-Way	14
C.1 Self-Evaluation and Compliance Activities to Date.....	14
C.2 Barrier Prioritization & Removal Recommendations.....	23
C.3 Barrier Removal Costs and Schedule	34
C.4 Strategy for Funding Barrier Removal.....	36
D. Future Actions to Achieve Compliance	37
D.1 Future Actions Needed	37
D.2 Annual Report of Barriers Removed	37
D.3 Five-Year ADA Transition Plan Update Schedule.....	37
E. Public Engagement.....	38
E.1 Public Engagement Strategy	38
E.2 Public Engagement Findings.....	40
E.3 Recommendations	46
F. Accessibility Regulations, Standards & Guidelines Resources.....	47
F.1 General Resources.....	47
F.2 Barrier-Specific Resources	47

List of Tables

Table 1. City of Gig Harbor Curb Ramp Inventory - ADA Compliance-Related Field Attributes..	15
Table 2. Revised City of Gig Harbor Curb Ramp Inventory Compliance Summary Table	18
Table 3. City of Gig Harbor Roundabout Locations and DWS Status.....	20
Table 4. Priority 1 Curb Barriers Within TIP Project Areas	25
Table 5. Priority 2 Curb Ramp Barriers within 50 Feet of Pedestrian Trail Routes and Transit Corridors	27
Table 6. Priority 3 Curb Ramp Barriers within Centers of Local Importance (COLIs).....	29
Table 7. Curb Ramp Barrier Priority Levels by Compliance Status, Count, and Percentage	31
Table 8. Other PROW Barrier Prioritization	33
Table 9. Individual ADA-Compliant Curb Ramp Cost Estimates	34
Table 10. Curb Ramp and Blended Transition Barrier Removal Cost Estimates	34
Table 11. New Accessible Pedestrian Signals Construction Cost Estimates.....	35
Table 12. Curb Ramp Barrier Removal Schedule with Estimated Funding.....	35
Table 13. Survey Responses by Platform.....	40
Table 14. Combined Ranked Score for Results for Most Wanted Barrier Removal Locations.....	43
Table 15. Combined Ranked Score for Most Wanted Barrier Types for Removal	44

List of Figures

Figure 1. Existing Curb Ramp Compliance Inventory Map (August 2021).....	16
Figure 2. Revised City of Gig Harbor Curb Ramp Inventory Compliance Summary Chart.....	18
Figure 3. City of Gig Harbor ADA Ramp Revised Compliance Status Map (October 6, 2021)	19
Figure 4. Blended Transition Candidate Locations	20
Figure 5. City of Gig Harbor Crosswalk Lights, Roundabout and Signalized Intersections Map...	21
Figure 6. Priority 1 Curb Ramp Barriers Within TIP Project Areas.....	26
Figure 7. Priority 2 Curb Ramp Barriers within 50 Feet of Pedestrian Trail Routes and Transit Corridors	28
Figure 8. Priority 3 Curb Ramp Barriers within Centers of Local Importance (CoLIs).....	30
Figure 9. Curb Ramp Barriers within All Priority Level Groups.....	32
Figure 10. Combined Results for Results for Most Wanted Barrier Removal Locations by Score	43
Figure 11. Combined Results for Most Wanted Barrier Types for Removal by Score.....	44

List of Appendices

Appendix A - Federal and Washington State Regulations

Appendix B1 - Revised ADA Inventory Data

Appendix B2 - GIS Curb Ramp Prioritization

Appendix B3 - DOJ/DOT Joint Technical Assistance ADA Curb Ramps Memo and Supplement

Appendix C - ADA Public Notice

Appendix D - ADA Grievance Procedure

Appendix E - 2021 Accessible Pedestrian Signal (APS) Policy

Appendix F - Public Engagement Strategy

Appendix G - Public Engagement Findings

List of Abbreviations

ADA - American with Disabilities Act

ADA/504 - Americans With Disabilities Act/Section 504 of the Rehabilitation Act of 1973

APS - Accessible Pedestrian Signal

CFR - Code of Federal Regulations (United States)

COVID-19 - Coronavirus Disease of 2019

DOJ - Department of Justice (United States)

DOT - Department of Transportation (United States)

DWS - Detectable Warning System

GIS - Geographic Information System

LAG - Local Agency Guidelines (published by Washington State Department of Transportation)

NCHRP - National Cooperative Highways Research Program

PROWAG - Public Right of Way Accessibility Guidelines

SR - State Route

USDOT - United States Department of Transportation

WSDOT - Washington State Department of Transportation

A. Introduction & Legal Requirements

The City of Gig Harbor is committed to removing barriers to accessibility in its public right-of-way facilities. To achieve this end, the City has completed a Public Right-of-Way Americans with Disabilities Act (ADA) Transition Plan.

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

A.1 Legal Precedent

The following federal laws and local Washington State guidelines informed the content and scope of this ADA Self-Evaluation and Transition Plan. See also Washington State Department of Transportation (WSDOT) Local Agency Guidelines Chapter 29 (June 2021).

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

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

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

A.1.2 American with Disabilities Act

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

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

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

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

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

A.2 Scope of ADA Transition Plan

The Federal requirements for preparing and implementing an ADA Transition Plan are outlined in specific code sections. Certain code sections also identify accessibility requirements for existing facilities, new construction and alterations of existing facilities. In addition, WSDOT provides local agency guidelines on ADA Transition Plan content. These codes and guidelines utilized in preparing the City's ADA Self-Evaluation and Transition Plan as well as the steps undertaken to engage the public in the process are included for reference in **Appendix A**.

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

A.2.1 Federal ADA Transition Plan Requirements

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

- Identify physical obstacles in the public entity's facilities that limit the accessibility of its programs or activities to individuals with disabilities;
- Describe in detail the methods that will be used to make the facilities accessible;
- Specify the schedule for taking the steps necessary to achieve compliance with this section and, if the time period of the transition plan is longer than one (1) year, identify steps that will be taken during each year of the transition period; and
- Indicate the official responsible for implementation of the plan.

A.2.2 Federal Accessibility Requirements for Existing Facilities

Section 28 § 35.150 of Title II of the ADA identifies the accessibility requirements for existing facilities. For full code text, see **Appendix A**.

A.2.3 Federal Accessibility Requirements for New Construction or Alterations

Section 28 § 35.151 of Title II of the ADA identifies the accessibility requirements for new construction or alterations to existing facilities. For full code text, see **Appendix A**.

A.2.4 Washington State Department of Transportation (WSDOT) Local Agency Guidelines

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

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

A.3 Organization of Document

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

The City of Gig Harbor is preparing its Public Right-of-Way Transition Plan in phases across multiple budget years. This first phase of the Transition Plan addresses these components related to accessibility barriers in the City's public right-of-way::

- Administrative Policies and Procedures
- Self-Evaluation and Compliance Activities to Date
- Barrier Prioritization & Removal Recommendations
- Barrier Removal Schedule and Costs
- Strategy for Funding Barrier Removal

The remaining sections address:

- Public Engagement
- Future Actions to Maintain and Achieve Compliance
- Accessibility Guidelines, Standards, and Resources
- Appendices

B. Administrative Policies and Procedures

In August 2021, Transportation Solutions, Inc., conducted a self-evaluation inventory of the City's existing ADA-related administrative policies and procedures identified in the WSDOT LAG Manual Chapter 29 Checklist (see **Appendix A**).

B.1 Official Responsible to Implement the ADA Transition Plan

The City has designed Jeff Langhelt, ADA/504 Coordinator/Public Works Director and Trent Ward, City Engineer, as the officials responsible to implement this Plan as part of this ADA Transition Plan; their contact information is provided below and available on the City's ADA webpage [here](#):

Jeff Langhelt, ADA Coordinator, Public Works Director
3510 Grandview Street
Gig Harbor, WA 98335
253-851-6170
Washington Telecommunication Relay Services: 7-1-1
Email: ADACoordinator@gigharborwa.gov

Trent Ward, City Engineer
3510 Grandview Street
Gig Harbor, WA 98335
253-853-7637
Washington Telecommunication Relay Services: 7-1-1
Email: TWard@gigharborwa.gov

B.2 ADA/504 Coordinator

The City has designated Jeff Langhelt, ADA/504 Coordinator/Public Works Director, as part of this ADA Transition Plan; their contact information is provided below and available on the City's ADA webpage [here](#).

Jeff Langhelt, ADA Coordinator, Public Works Director
3510 Grandview Street
Gig Harbor, WA 98335
253-851-6170
Washington Telecommunication Relay Services: 7-1-1
Email: ADACoordinator@gigharborwa.gov

B.3 Public Notice of ADA Provisions

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

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

B.4 ADA Grievance Procedure

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

B.5 Accessible Pedestrian Signal (APS) Policy

The City established an APS Policy as part of this ADA Transition Plan; the APS Policy is posted [here](#) and is provided in **Appendix E**.

C. Public Right-of-Way

This chapter describes the City's efforts to address public right-of-way ADA barriers within the Phase 1 scope of the Public Right-of-Way ADA Transition Plan according to the following steps:

- Self-Evaluation and compliance activities to date.
- Barrier prioritization and removal recommendations.
- Barrier removal schedule and costs.
- Strategy for funding barrier removal.

The Phase 1 scope focuses on curb ramps. Some information related to Accessible Pedestrian Signal (APS) features is discussed. Other public right-of-way facilities, such as sidewalks, driveway interface with sidewalks, accessible parking and fully-compliant APS systems, will be covered in future phases/updates to this ADA Transition Plan.

C.1 Self-Evaluation and Compliance Activities to Date

C.1.1 Curb Ramps

Starting in 2013, the City's curb ramp assets were mapped in CAD and GIS without an entirely comprehensive system to keep the assets in sync. The City started using an asset management software, Cartegraph, in 2016 to track work on City assets. At that time, some assets were loaded into Cartegraph from existing CAD/GIS, while other assets were created directly in Cartegraph. There was still no entire synchronization of the systems.

In 2019, the City started a new GIS program to create that comprehensive, synchronized system. Much time has been dedicated over the past 2+ years to compile the City's data from CAD, GIS and Cartegraph in order to create a master database of the City assets into a comprehensive GIS (a major City effort took place in April 2020 to sync the GIS with Cartegraph). This GIS is now synchronized with Cartegraph for most of the applicable assets. City staff confirmed there were ramps that had been re-configured, moved, or removed since April 2020.

C.1.1.1 PDF Attachments of Curb Ramp Evaluations

Of the City's original inventory, most curb ramp features (503 out of 572 total) include a pdf attachment of the Washington State Department of Transportation (WSDOT) Curb Ramp Evaluation Form used to assess ramp compliance. City staff believe the evaluations were based on the 2010 Standards because the majority of the inventory efforts were done in 2014.

C.1.1.2 GIS Attribute Data

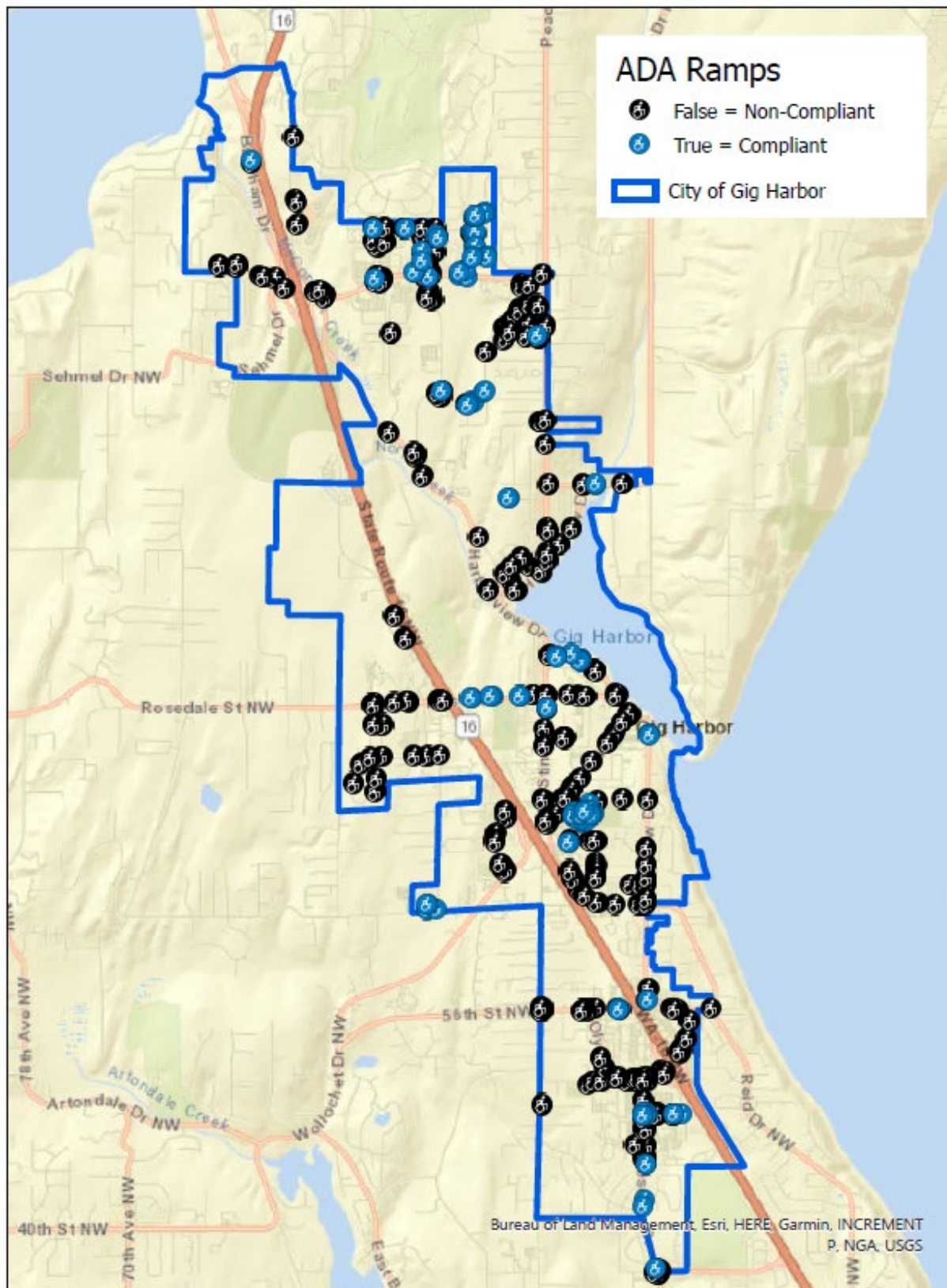
The City's **ADA_Ramps** GIS feature class includes thirty-six (36) attribute fields, roughly half of which relate to measures of ADA compliance. While these fields are present, many fields include blank <Null> values. Additional information may be present in the PDF attachments. See

Table 1. The most significant field is the “Compliant” attribute field. If a curb ramp does not meet a single technical standard, it can be marked as non-compliant. See **Figure 1**.

Table 1. City of Gig Harbor Curb Ramp Inventory - ADA Compliance-Related Field Attributes

No	Field	Attribute
1	Clear Width (assumed feet)	Values range from blank to 4.5 to 9
2	Cross Slope (assumed %)	Values range from blank to 0 to 3
3	Detectable Warning	0 (Not Present)
		1 (Present)
4	Slope (assumed %)	Values range from blank to 0 to 8.2
5	Type (included for 98 out of 572 features; count for type provided in parentheses)	Combination (6)
		Commercial Driveway/Entrance (4)
		Missing (8)
		Parallel (16)
		Perpendicular (53)
		Raised Crossing (2)
		Blank (474), Null (2) or Not Surveyed (7)
6	Audible Components	TRUE (Present)
		FALSE (Not Present)
7	Crosswalk Marking	Null
		None
		Piano Keys
		Stamped Concrete
		Blank
8	In Pavement Lighting	TRUE (Present)
		FALSE (Not Present)
9	MEF (Maximum Extent Feasible)	Null (Blank)
		FALSE (Does not have documented MEF)
10	Pedestrian Push Button	TRUE (Present)
		FALSE (Not Present)
11	Pedestrian Signal Head	TRUE (Present)
		FALSE (Not Present)
12	Ramp Serves Multiple Crossings	Null (Blank)
		TRUE (Yes)
		FALSE (No)
13	RRFB (Rectangular Rapid Flashing Beacon)	TRUE (Present)
		FALSE (Not Present)
14	Compliant	TRUE (Compliant)
		FALSE (Not Compliant)

Figure 1. Existing Curb Ramp Compliance Inventory Map (August 2021)



C.1.1.3 2021 ADA Curb Ramp Inventory Update

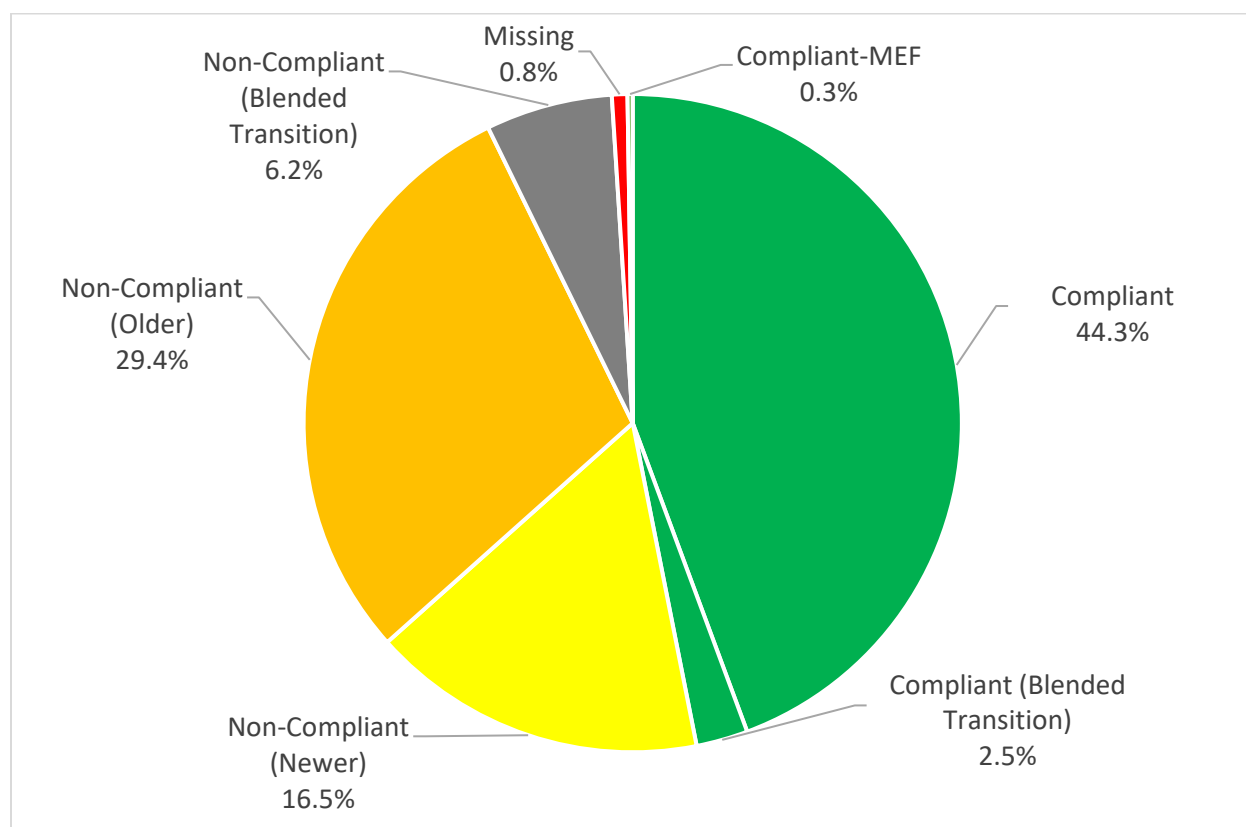
Transportation Solutions, Inc., revised and updated the GIS curb ramp inventory to reflect current conditions through October 2021. The WSDOT Curb Ramp Evaluation Form pdf attachments were reviewed and Google Maps street view was utilized to validate changes before updating GIS attribute data.

Curb ramp features were reassigned as necessary to match the below groups:

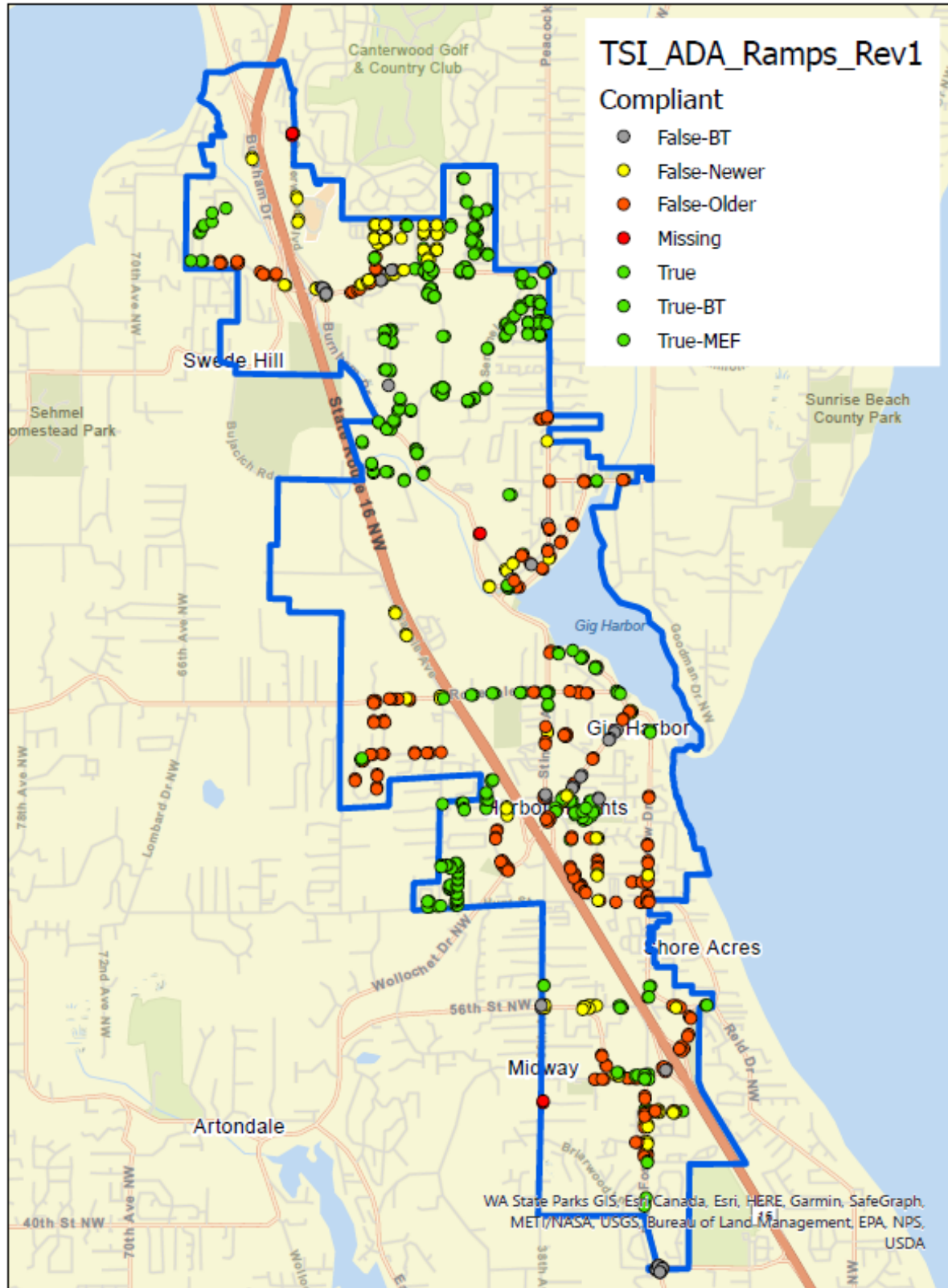
- Compliant
 - True (compliant to 2010 ADA Standards)
 - True-BT (compliant Blended Transition locations)
 - True-MEF (compliant to Maximum Extent Feasible or other exception)
- Non-Compliant
 - False-Newer (appears recently constructed; minor or few non-compliant features)
 - False-Older (older construction; multiple non-compliant features)
 - False-BT (Blended Transition candidates)
- Missing (no ramp is present but one is required)
- Deleted ramps (ramp not needed/no longer exists, etc.)

Over 200 curb ramp locations were added to the inventory, many for recently constructed compliant ramps related to City improvement projects and new residential development.

This more detailed categorization enables City staff to identify corridors or clusters of older non-compliant barriers that may present more barriers than recently constructed curb ramps with minor non-compliance issues. It also helps City staff identify ramps that may fall within the Safe Harbor provisions of the 2010 ADA Standards. For a summary of the revised curb ramp compliance statistics, see **Tables 2-3** and **Figure 2**. For further inventory information, see **Appendix B1**.

Figure 2. Revised City of Gig Harbor Curb Ramp Inventory Compliance Summary Chart**Table 2. Revised City of Gig Harbor Curb Ramp Inventory Compliance Summary Table**

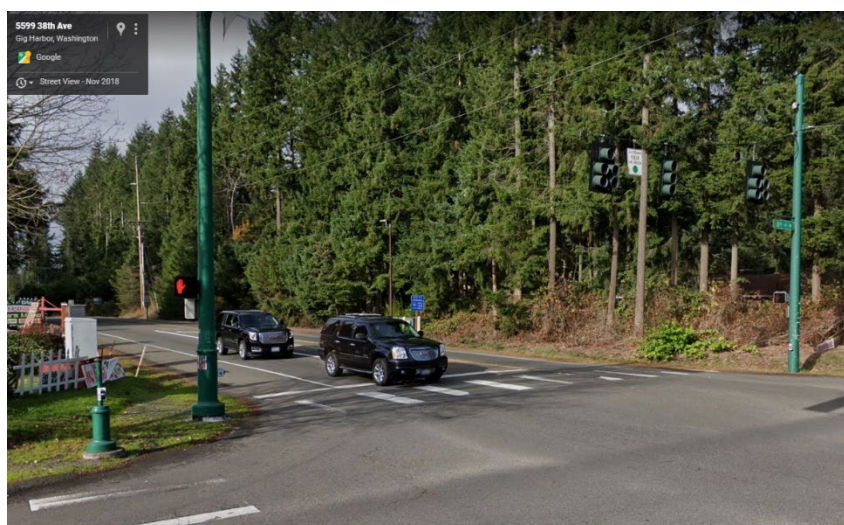
Revised ADA "Compliant" Status	"Compliant" Field Definition	# of Locations	%	
True	Compliant to 2010 Standards	349	44.3%	47.1%
True-BT	Compliant Blended Transition	20	2.5%	
True-MEF	Compliant to Maximum Extent Feasible or other justification	2	0.3%	
False-Newer	Newer condition, not compliant to 2010 Standards (may be minor non-compliant feature)	130	16.5%	52.1%
False-Older	Older condition, not Compliant to 2010 Standards (may be built to older standard)	231	29.4%	
False-BT	Blended Transition and/or DWS not present	49	7.9%	
Missing	No ramp is present but one is required	6	0.8%	0.8%
TOTAL		787	100%	100%
Deleted	No ramp required; crossing no longer exists, etc.	7		

Figure 3. City of Gig Harbor ADA Ramp Revised Compliance Status Map (October 6, 2021)

C.1.1.4 Blended Transitions

Some locations within the City's curb ramp inventory are better described as blended transition candidates. Blended transitions are defined as "a raised pedestrian street crossing, depressed corner, or similar connection between the pedestrian access route at the level of the sidewalk and the level of the pedestrian street crossing that has a grade of 5 percent or less" ([2011 PROWAG](#), Section R105.5). See west side of intersection at 56th St and 38th Ave in **Figure 4**.

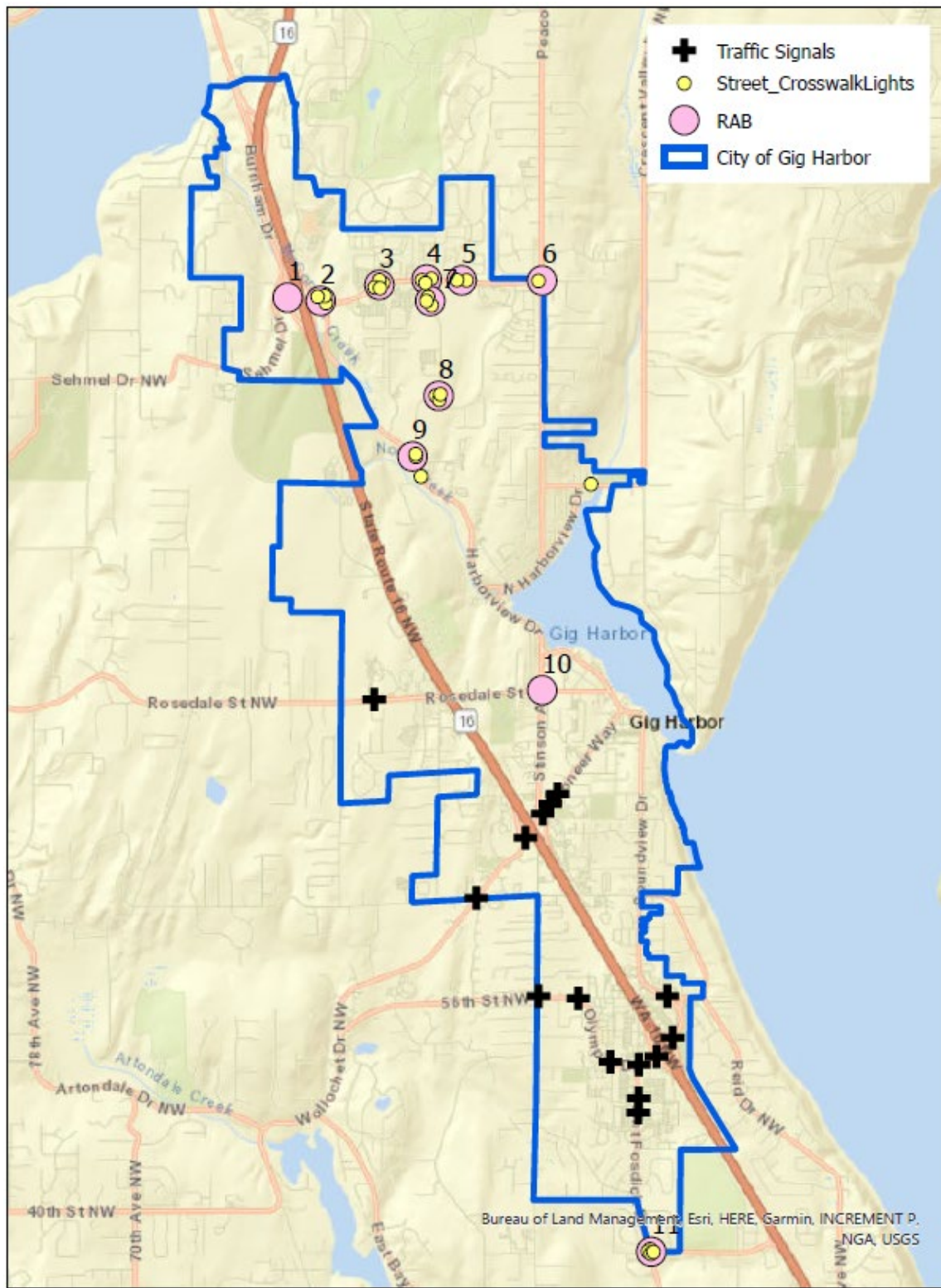
Figure 4. Blended Transition Candidate Locations



The presence of a pedestrian crossing suggests pedestrian activity in the area. Such crossings require blended transitions with detectable warning surfaces (DWS) to inform persons with visual disabilities that they are entering a roadway ([2011 PROWAG](#), Section R207). The DWS component of blended transitions may also be needed at roundabout splitter islands. Of the city's eleven (11) existing roundabouts, five (5) lack detectable warning surfaces at splitter islands. See **Table 3** and **Figure 5**.

Table 3. City of Gig Harbor Roundabout Locations and DWS Status

RAB_ID	RAB Location	DWS Status at Center Islands
1	Burnham Dr / WA-16 SB ramps	N/A (no center islands)
2	Borgen Blvd / Canterwood Blvd / WA-16 NB ramps	Missing DWS on E and NE approaches
3	Borgen Blvd / 51 st Ave NW	Missing DWS
4	Borgen Blvd / Borgen Loop / Harbor Hill Dr	DWS exists
5	Borgen Blvd / Olympus Way	Missing DWS
6	Borgen Blvd / Peacock Hill Dr / 112 th St	Missing DWS on N approach
7	51 st Ave / Harbor Hill Dr	DWS exists
8	Harbor Hill Dr / Sentinel Dr	DWS exists
9	Burnham Dr / Harbor Hill Dr	DWS exists
10	Rosedale St NW / Stinson Ave	N/A (no center islands)
11	36 th St / Point Fosdick Rd	Missing DWS

Figure 5. City of Gig Harbor Crosswalk Lights, Roundabout and Signalized Intersections Map

C.1.2 Accessible Pedestrian Signal (APS) Features

The City's curb ramp inventory included fields for Accessible Pedestrian Signal (APS) related components with limited data recorded. Attribute fields include audible components, pedestrian pushbuttons, pedestrian signal head, and presence of Rectangular Rapid Flashing Beacons (RRFB).

A fully ADA-compliant APS system at a pedestrian crossing includes audio, visual, and vibro-tactile components, as well as pole placement. While presence of a pedestrian pushbutton enhances accessibility, pushbuttons alone do not meet current ADA requirements.

The "Street_Crosswalk Lights" GIS inventory includes information on pedestrian pushbutton locations but not all APS component features. Most of the roundabouts in the City include pedestrian pushbuttons at RRFBs. There are no inventoried crosswalk lights (pedestrian pushbuttons) for signalized intersections in the City. Some roundabouts and signalized intersections do not include pedestrian facilities on one or all approaches and therefore do not require APS features on those approaches.

For a map of the City's roundabouts, signalized intersections and existing pedestrian pushbutton ("Streets_Crosswalk Lights") inventory, see **Figure 5**. For associated spreadsheet data, see **Appendix B1**.

The City's APS Policy guides the installation of new APS features. For more information, see **Section B.5 and Appendix E**.

C.1.3 Recent Compliance Activities

The City has completed the following actions to increase accessibility within the City's PROW:

C.1.3.1 Curb Ramps

- Inventoried and assessed ADA compliance of over 70% of curb ramps based on WSDOT Curb Ramp Evaluation form (2010 ADA Standards).
- Created a GIS database of its existing curb ramp assets.
- Upgraded or installed new ramps as part of recent City improvement projects or as a result of new residential developments at the following locations:
 - Roundabouts along Harbor Hill Dr
 - Burnham Dr between 50th Ave NW and 96th St
 - Olympic Dr intersections at 50th St Ct, Key Bank driveway, and Point Fosdick Rd
 - Neighborhoods
 - North of 112th St (65th and 66th Avenues/115th St Ct/116th St Ct)
 - Between Sentinel Dr and Peacock Hill Ave NE south of Borgen Blvd
 - Along McCormick Creek Dr and Driftwood Ave
 - West of Burnham Dr and north of 96th St
 - West of 46th Ave and north of Hunt St NW
 - North and south of 72nd St
 - Stinson Corridor (Grandview St to Rosedale St)

C.1.3.2 APS Features

- Began inventory of APS-related features (RRFBs at roundabouts and select pedestrian crossings).

C.2 Barrier Prioritization & Removal Recommendations

An ADA Transition Plan is required to provide a detailed outline of the methods to be used to remove barriers to accessibility. It is the City's responsibility to determine how to make reasonable progress toward the removal of accessibility barriers. Agencies may determine their own prioritization methodology to comply with the ADA:

- **ADA Requirement:** [Section 28 CFR 35.150 \(d\)\(2\)](#) identifies locations of priority for curb ramps: *If a public entity has responsibility or authority over streets, roads, or walkways, its transition plan shall include a schedule for providing curb ramps or other sloped areas where pedestrian walks cross curbs, giving priority to walkways serving entities covered by the Act, including State and local government offices and facilities, transportation, places of public accommodation, and employers, followed by walkways serving other areas.*
- **ADA Requirement:** Agencies should respond to grievances or complaints regarding ADA barriers in accordance with their ADA Grievance Procedure.
- **ADA Requirement:** [2013 DOJ Technical Memo Regarding Installation of Curb Ramps](#) and [Supplement](#) provide additional details related to provision of curb ramps during resurfacing, alteration and maintenance projects. See **Appendix A**.
- **Guidance:** [NCHRP No 20-7 \(232\) ADA Transition Plans: A Guide to Best Management Practices](#) recommends consideration of curb ramp barrier location, degree of utilization and degree of non-compliance.

This ADA Transition Plan utilizes both generic and barrier-specific prioritization criteria. The first section describes the generic prioritization criteria applicable to all barrier types. The subsequent sections focus on prioritization criteria unique to individual barrier types with a recommended schedule for removal of barriers.

C.2.1 Generic Prioritization Criteria

It is recommended the City consider this generic schema as the guiding prioritization policy for all barrier types:

C.2.1.1 Higher Priority

- Barriers to accessibility identified in filed grievances/complaints (see Note below).
- Barriers to accessibility identified through public engagement efforts.
- Barriers to accessibility correlated to planned capital improvement project improvements or department upgrades.

C.2.1.2 Lower Priority

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

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

ADA Transition Plan best practices recommend that Plans be guided by the principle that the barriers identified or experienced by people within the ADA community are of higher priority for removal than other barriers. Public outreach efforts were therefore a critical component of the prioritization process. The criteria also take into consideration concurrent City projects and planning efforts to maximize the efficiency of accessibility barrier removal.

C.2.2 Curb Ramps

In addition to the **generic prioritization schema** described previously in this document, it is recommended the City utilize the following location-based prioritization methodology to group the City's ADA curb ramp barriers into three priority tiers:

- **Priority 1** - Proximity to Transportation Improvement Program (TIP) Projects
- **Priority 2** - Proximity to Pedestrian Trail Routes and Transit Corridors
- **Priority 3** - Proximity to Centers of Local Importance (COLIs)

It is also recommended the City consider the **severity of non-compliance** when selecting locations for barrier removal. The curb ramp inventory "Compliant" attribute distinguishes between newer and older non-compliant ramps as well as locations where ramps are missing or in need of blended transitions/ detectable warning surface (DWS). Newer ramps may have minor technical non-compliance issues but are otherwise functional. Older ramps with more non-compliant features (steep slopes, narrow path of travel, no detectable warning surface, no landing, etc.) likely present a greater barrier than newer ramps while still providing some functionality as compared to a location that is missing a ramp. This "Compliant" attribute serves as a measure of non-compliance severity and is included in the summary tables and maps for each priority group below. For detailed GIS Curb Ramp Barrier Prioritization Model Documentation and GIS Curb Ramp Barrier Priority Group Spreadsheets, see **Appendix B2**.

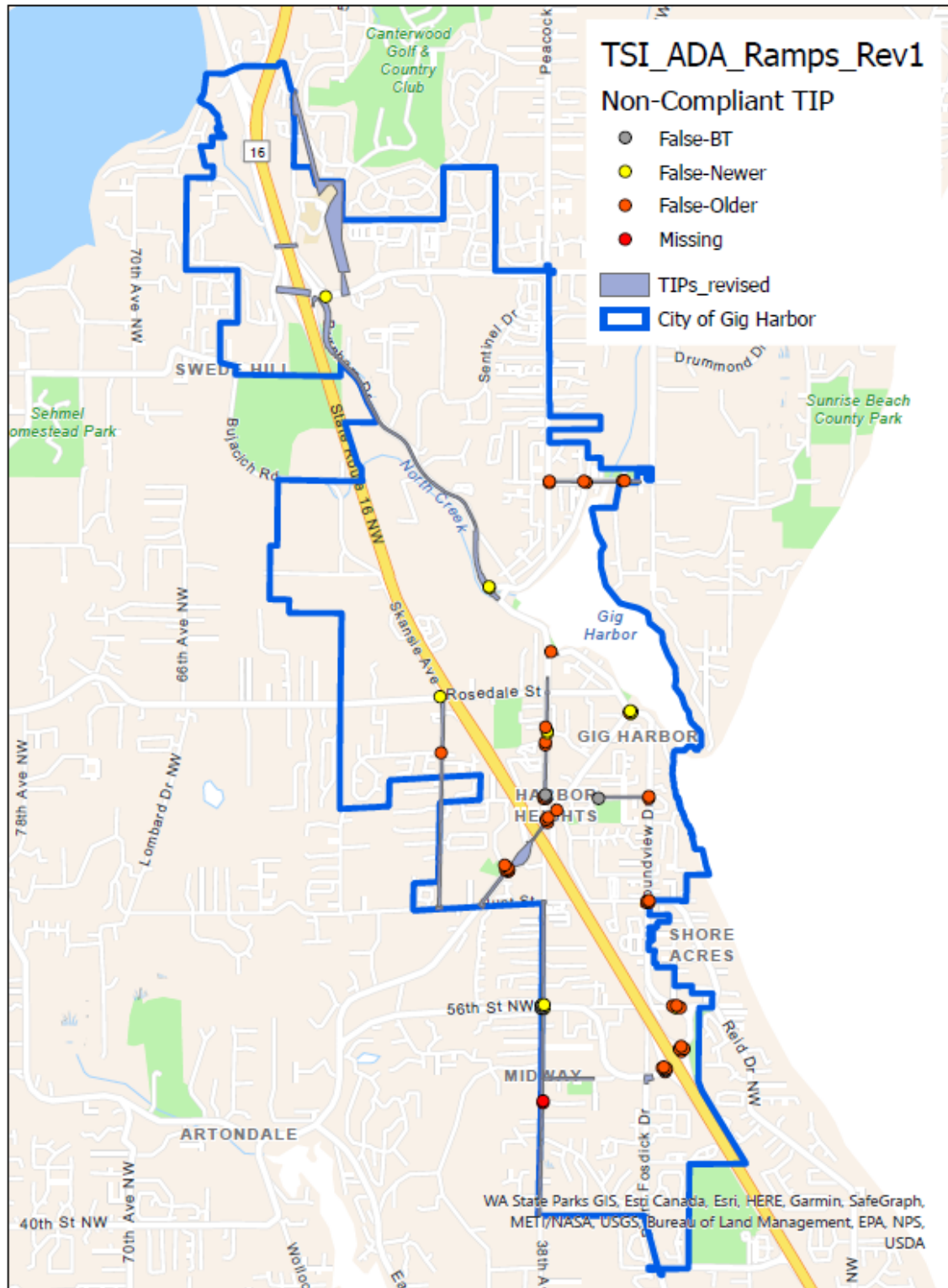
C.2.2.1 Priority Level 1 - Proximity to Planned Transportation Improvement Program (TIP) Projects

The City's six-year TIP project locations have been mapped using GIS. These **TIP** polygons represent a likely buffer around the project area to capture curb ramp barriers that may be

upgraded as part of the projects. It is estimated that approximately 65 curb ramp barriers could be addressed by these improvement projects. See **Table 4** and **Figure 6**. Note: **TIPs_revised** in the map legend refers to the updated TIP feature class provided by City Staff; name has been retained in ArcGIS Pro map project files.

Table 4. Priority 1 Curb Barriers Within TIP Project Areas

"Compliant" Status	"Compliant" Field Definition	# of Locations within TIP Project Areas
False-Newer	Newer condition, not compliant to 2010 Standards (may be minor non-compliant feature)	13
False-Older	Older condition, not Compliant to 2010 Standards (may be built to older standard; *5 duplicates removed)	41
False-BT	Blended Transition and/or DWS not present (*2 duplicates removed)	9
Missing	No ramp is present but one is required	2
TOTAL (*7 duplicates removed due to overlapping TIP project areas)		65

Figure 6. Priority 1 Curb Ramp Barriers Within TIP Project Areas

C.2.2.2 Priority Level 2 - Proximity to Pedestrian Trails and Transit Routes

The City of Gig Harbor is a maritime tourist destination with nine designated trail routes including the 2.2 mile long Harborview Trail along the City's waterfront. Other trails connect the City's Centers of Local Interest (CoLIs) to each other (see [City of Gig Harbor Parks and Trails map](#)).

Pierce County transit routes and the Gig Harbor trolley route overlap portions of the City's trails network and provide additional connections along principal and minor arterials within City limits.

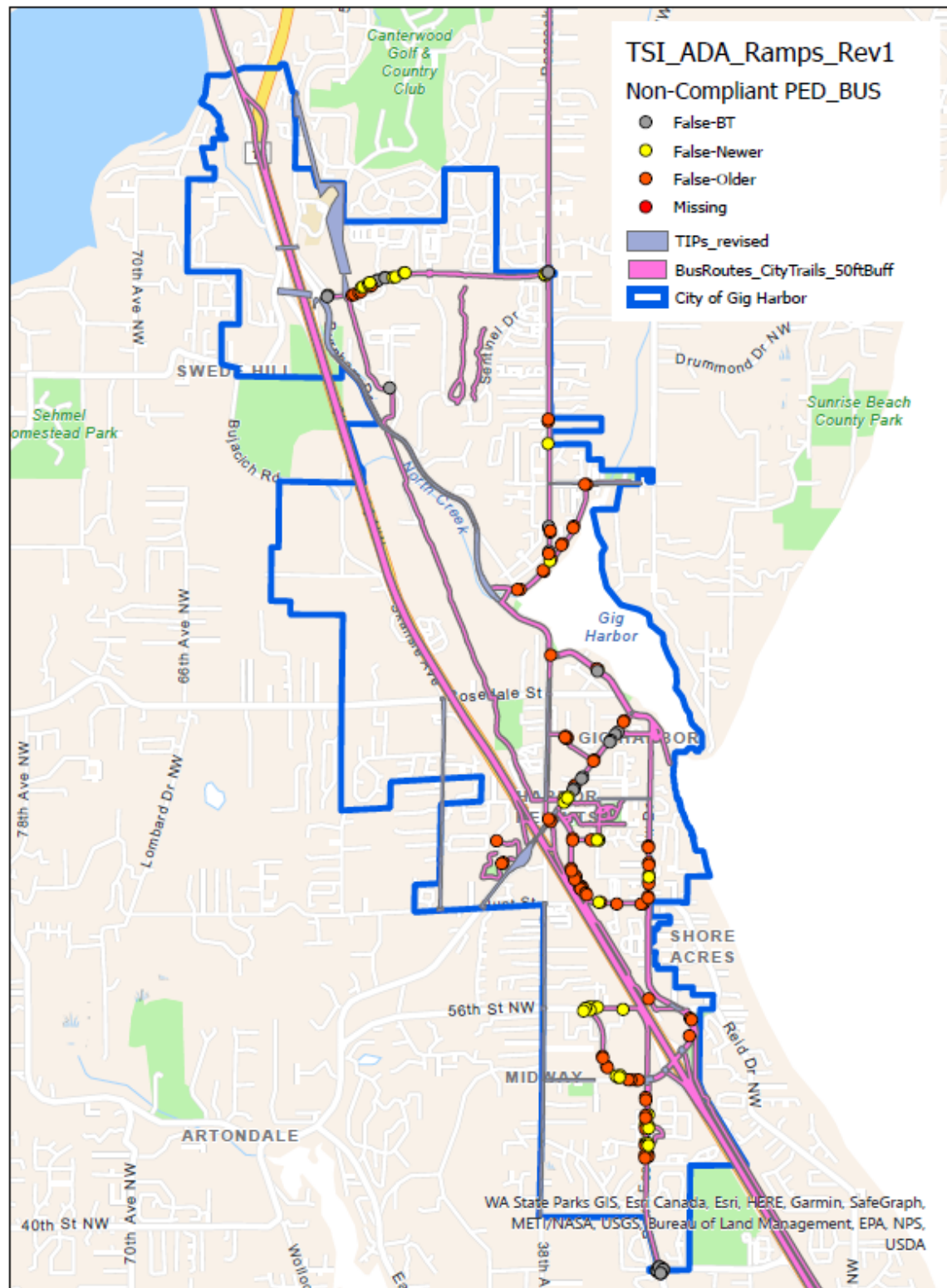
For this GIS prioritization model, the pedestrian trail routes and transit corridors data sets were merged and a fifty foot buffer to them was added to capture nearby curb ramp barrier locations. It is estimated that approximately 221 curb ramp barriers are within this "PED_BUS" buffer area. See **Table 5** and **Figure 7**.

- 47 curb ramp barriers within the **PED_BUS** buffer are also within **TIP** project areas.
- 174 curb ramp barriers within the **PED_BUS** buffer are outside **TIP** project areas.

Table 5. Priority 2 Curb Ramp Barriers within 50 Feet of Pedestrian Trail Routes and Transit Corridors

"Compliant" Status	"Compliant" Field Definition	# of Locations in PED_BUS Buffer	# of Locations in PED_BUS Buffer within TIP Areas	# of Locations in PED_BUS Buffer outside TIP Areas
False-Newer	Newer condition, not compliant to 2010 Standards (may be minor non-compliant feature).	55	10	45
False-Older	Older condition, not Compliant to 2010 Standards (may be built to older standard)	132	33	99
False-BT	Blended Transition and/or DWS not present.	34	4	30
Missing	No ramp is present but one is required	0	0	0
TOTAL		221	47	174

Figure 7. Priority 2 Curb Ramp Barriers within 50 Feet of Pedestrian Trail Routes and Transit Corridors



C.2.2.3 Priority Level 3 - Proximity to Centers of Local Importance (CoLIs)

The [City of Gig Harbor Comprehensive Plan Transportation Element](#) defines Centers of Local Importance (CoLIs) as *compact, mixed-use centers that promote pedestrian-oriented development, provide diverse services, and include a variety of high and medium density housing. The CoLIs and their associated transportation corridors tend to accommodate and attract a high level of travel by all modes and include commercial services.* CoLIs include priority destinations identified in [Section 28 CFR 35.150 \(d\)\(2\)](#) (state and local government offices and facilities, transportation, places of public accommodation, and employment centers). The City's five CoLIs are:

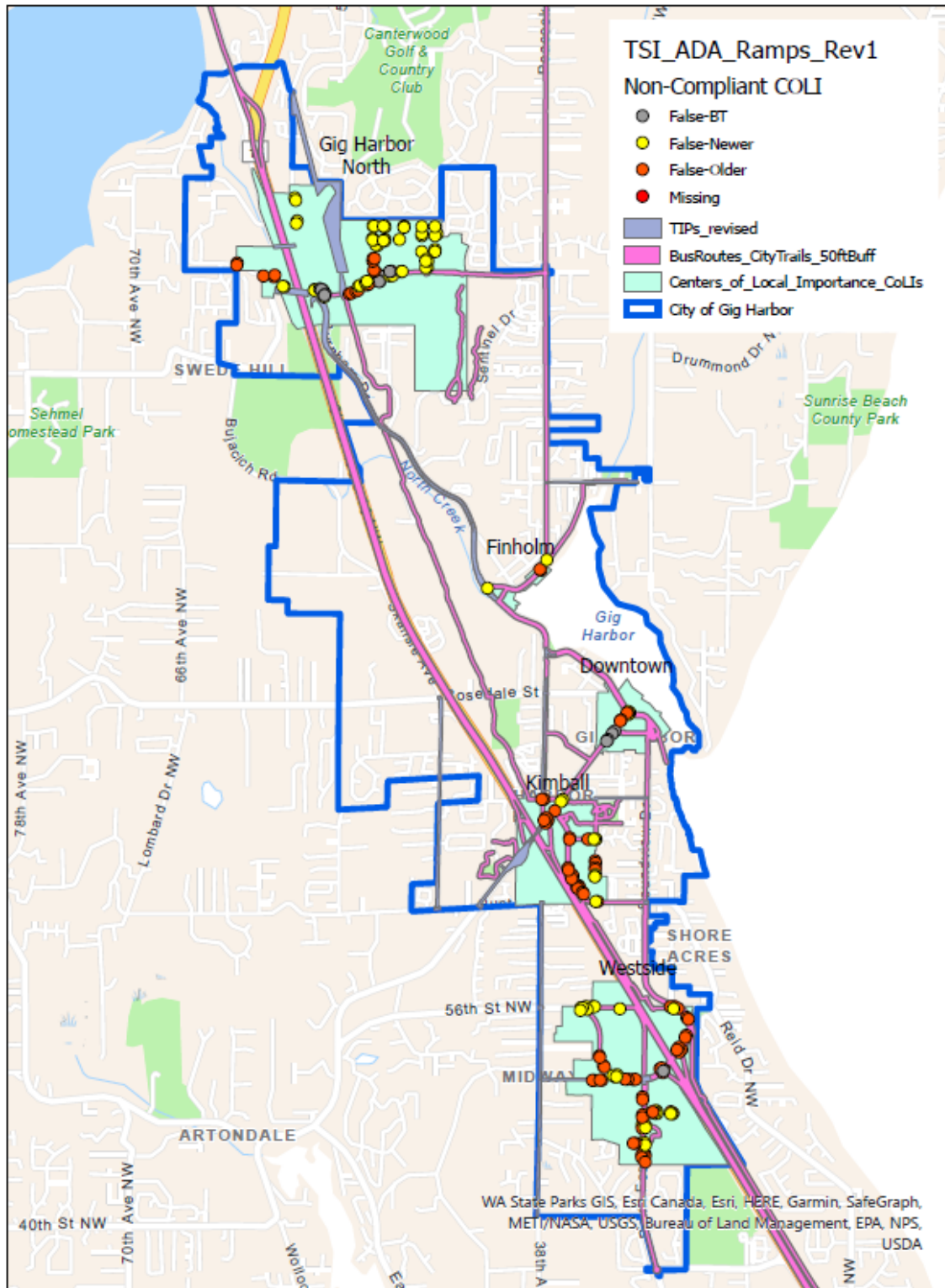
- Gig Harbor North
- Westside
- Downtown
- Kimball
- Finholm

In this GIS prioritization model, curb ramp barriers located within the City's CoLI polygons are identified by the "COLI" attribute. It is estimated that approximately 207 curb ramp barriers are within **COLI** areas. See **Table 6** and **Figure 8**.

- 122 curb ramp barriers within the **COLI** polygons are also within **TIP** or **PED_BUS** areas.
- 85 curb ramp barriers within the **COLI** polygons are outside **TIP** or **PED_BUS** areas.

Table 6. Priority 3 Curb Ramp Barriers within Centers of Local Importance (CoLIs)

"Compliant" Status	"Compliant" Field Definition	# of Locations in COLI	# of Locations in COLI within TIP or PED_BUS	# of Locations in COLI outside TIP or PED_BUS
False-Newer	Newer condition, not compliant to 2010 Standards (may be minor non-compliant feature).	93	41	52
False-Older	Older condition, not Compliant to 2010 Standards (may be built to older standard)	94	68	26
False-BT	Blended Transition and/or DWS not present.	20	13	7
Missing	No ramp is present but one is required	0	0	0
TOTAL		207	122	85

Figure 8. Priority 3 Curb Ramp Barriers within Centers of Local Importance (CoLIs)

C.2.2.4 Remaining Curb Ramp Barriers

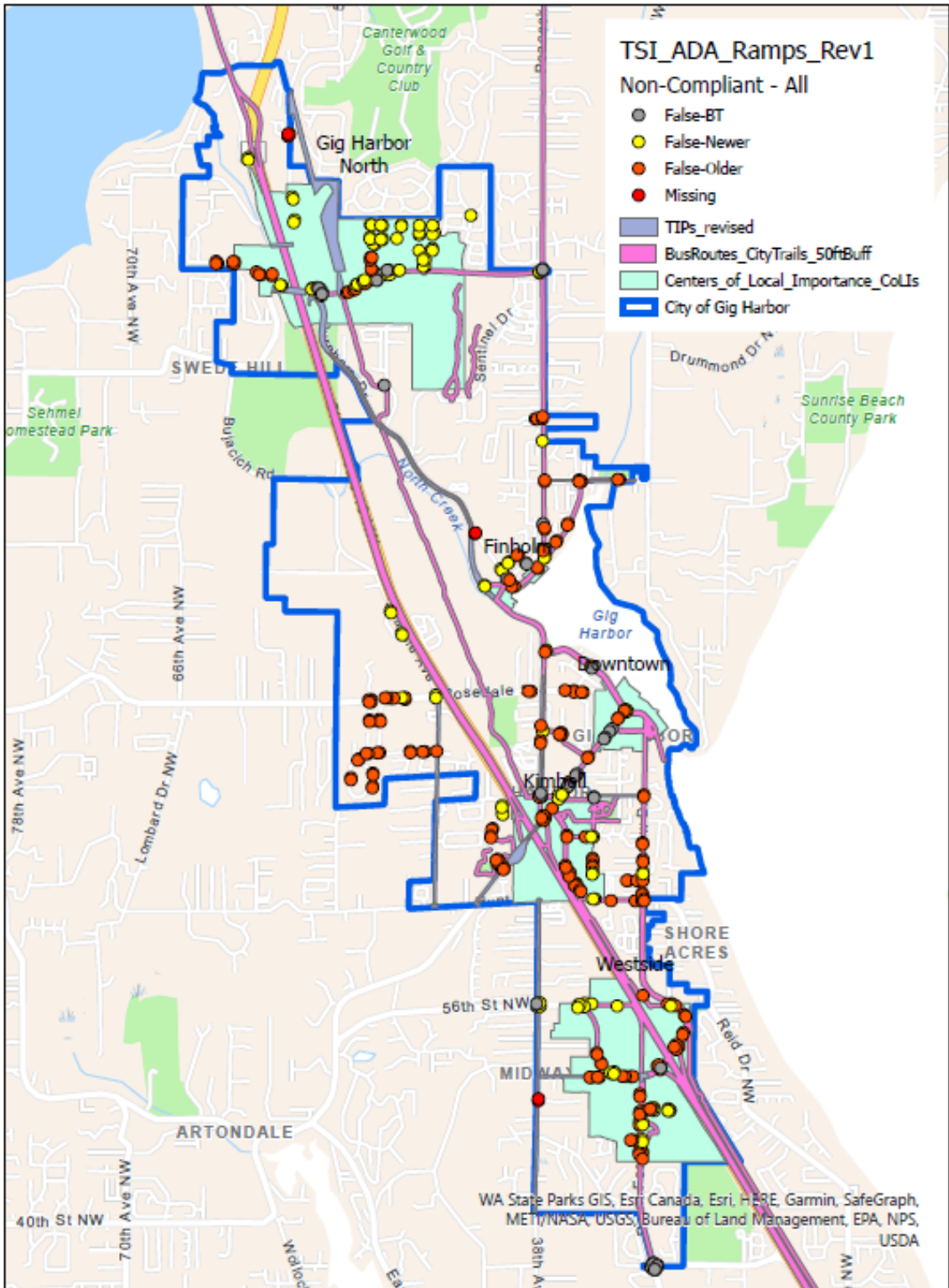
92 ramps are located outside the geographic boundaries of all three priority groups. These ramps are considered lower priority based on location, however four of the barriers in this remainder group are locations where ramps are missing.

Table 7 and **Figure 9** provide a summary of all 416 curb ramp barriers by priority level including the remainder group.

Table 7. Curb Ramp Barrier Priority Levels by Compliance Status, Count, and Percentage

Priority Level	Priority Group Name	Priority Group Description	ADA Compliance Status	Count	%
1	TIP	Within 50 feet of planned TIP Project	False-Newer	13	-
			False-Older	41	-
			False-BT	9	-
			Missing	2	-
Priority Level 1 Sub-Total				65	16%
2	PED_BUS	Beyond planned TIP Project areas and within (≤) 50 feet of Pedestrian Trail Routes and Transit Corridors	False-Newer	45	-
			False-Older	99	-
			False-BT	30	-
			Missing	0	-
Priority Level 2 Sub-Total				174	42%
3	COLI	Beyond planned TIP project areas and beyond (>) 50 feet of Pedestrian Trail Routes and Transit Corridors	False-Newer	52	-
			False-Older	26	-
			False-BT	7	-
			Missing	0	-
Priority Level 3 Sub-Total				85	20%
4	Remainder	Beyond planned TIP project areas, beyond (>) 50 feet of Pedestrian Trail Routes and Transit Corridors, and outside COLI areas	False-Newer	20	-
			False-Older	65	-
			False-BT	3	-
			Missing	4	-
Group 4 Remainder Sub-Total				92	22%
Curb Ramp Barrier Total				416	100%

Figure 9. Curb Ramp Barriers within All Priority Level Groups



C.2.2.5 Curb Ramp Barrier Removal Recommendations

It is recommended the City:

- Recognize these priority groupings are for planning purposes and are not intended to represent a specific implementation schedule or sequence by the City.
- Utilize the GIS Prioritization Model as a tool for selection and monitoring of curb ramp barrier removal.
- Consider barriers identified by the public through grievances when selecting high priority barriers for removal during annual budgeting activities.
- Consider establishing a policy for how to respond to public requests for curb ramp barrier removal.
- Consider grouping barriers by corridor or intersections to provide for cost effective barrier removal.
- At future updates of the plan, or annual reporting activities, identify curb ramp upgrades completed by private development frontage improvements in the PROW.
- At future updates of the plan, consider developing similar GIS prioritization models based on TIP, pedestrian route/transit corridor and CoLI overlays for other PROW barriers.
- At future updates of the plan, consider establishing a policy for how to respond to public requests for other PROW barrier removal.

C.2.3 APS Features

ADA upgrades of non-compliant APS features will be prioritized according to the City's Accessible Pedestrian Signal Policy adopted in this Transition Plan. The APS Policy guides the installation of new APS facilities as well as addressing replacement of existing APS facilities and public requests. See **Appendix E**.

C.2.4 Other Public Right-of-Way Facility Prioritization

Whereas the focus of this ADA Transition Plan is on curb ramp barriers, future ADA Transition Plan efforts may consider the following prioritization criteria for other PROW barriers. See **Table 8**.

Table 8. Other PROW Barrier Prioritization

Barrier Type	Prioritization
Sidewalks	Grievances, Planned TIP Projects, and Public Requests
Pedestrian Crossings	Grievances, Planned TIP Projects, Proximity to Pedestrian Routes/ Transit Corridors/CoLIs, and Public Requests

C.3 Barrier Removal Costs and Schedule

C.3.1 Barrier Removal Cost Estimates

C.3.1.1 Curb Ramps Cost Estimate

A planning level estimated cost for replacing one (1) curb ramp is \$15,000. See **Table 9**.

Table 9. Individual ADA-Compliant Curb Ramp Cost Estimates

Unit	Cost (\$2021)
Survey/Map	\$1,600.00
Design	\$1,900.00
CM	\$1,500.00
Construction	\$7,500.00
Subtotal	\$12,500.00
Contingency (15%)	\$2,500.00
Cost (\$) per Curb Ramp	\$15,000.00

To estimate the probable program cost to remove all curb ramp and blended transition barriers, a cost estimate ranges from \$12,750 (85%) to \$17,250 (115%) per barrier has been provided.

In addition to design and construction of the curb ramp itself, additional costs may arise from addressing issues such as relocation of existing utilities, acquisition of new public right of way, and other roadway improvements such as curb bulbs and new enclosed drainage. Removal of blended transition barriers may cost less than estimated if installation of detectable warning surfaces is sufficient to remove barriers to accessibility.

Note regarding Safe Harbor: Any ramp location should be re-evaluated for Safe-Harbor and accessibility as part of the survey/design phase of a specific project/request for an upgrade. Non-compliant newer ramps may meet Safe Harbor provisions and potentially reduce the cost estimate. Non-compliant older ramps are not likely to meet Safe Harbor due to lack of a detectable warning system.

To remove and replace all 416 curb ramp and blended transition barriers, it would cost an estimated \$5.3 to \$7.2 million (in 2021 dollars). See **Table 10**.

Table 10. Curb Ramp and Blended Transition Barrier Removal Cost Estimates

Overall Probable Program Cost for 416 Curb Ramp and Blended Transition Barriers			
Cost Range	LOW	MED	HIGH
Cost Percentage (%) of Estimate	85%	100%	115%
Cost (\$2021) per Ramp	\$12,750	\$15,000	\$17,250
Total Curb Ramp Program	\$5,304,000	\$6,240,000	\$7,176,000

C.3.1.2 Accessible Pedestrian Signals Cost Estimate

For informational purposes, the following cost estimates have been provided for new APS facilities in **Table 11**.

Table 11. New Accessible Pedestrian Signals Construction Cost Estimates

Accessible Pedestrian Signal (APS) Type	Construction Cost Estimates (\$2021)
Full APS (at signalized intersection)	\$35,000
Rapid Rectangular Flashing Beacon (with audible features and vibro-tactile pushbuttons)	\$15,000

C.3.2 Barrier Removal Schedule

C.3.2.1 Curb Ramp Barriers

For the period 2022-2027, the City estimates approximately \$1.5 million in funding to remove curb ramp barriers. This includes an estimated \$500,000 for the year 2022 from the City's Pavement Maintenance & Repair Program. It is estimated that the City will remove all 416 curb ramp barriers within the next 25 year planning horizon, averaging \$250,000 annually (in 2021 dollars). See the following calculation breakdown of total costs associated with curb ramp barrier removal and **Table 12** below:

- \$15,000 per ramp x 416 ramps = \$6,240,00
- \$6,240,000 / 25 years = \$249,600 per year
- \$249,600 / \$15,000 per ramp = 16.64 ramps per year

Table 12. Curb Ramp Barrier Removal Schedule with Estimated Funding

Estimated Curb Ramp Barrier Removal Schedule	Estimated Amount (\$2021)
Total Estimated Curb Ramp Barrier Removal Costs	\$6,240,000
2022 Pavement Maintenance & Repair Program	(\$500,000)
2022-2027 6-Year TIP Projects and 2023- Pavement Maintenance & Repair Program	(\$1,000,000)
2028-2047 (19 years) Remaining Curb Ramp Barrier Costs (25-Year horizon averaging 17 ramps or \$250,000 per year)	\$4,740,000

For more information, see the City of Gig Harbor 2022 Annual Budget.

C.4 Strategy for Funding Barrier Removal

C.4.1 Curb Ramp Barrier Removal

Funding for curb ramp barrier removal is anticipated to come from:

- General Fund
- Annual Pavement Maintenance and Repair Program
- HBZ (Hospital Benefit Zone)
- Solicitation of future State and Federal grants as they are available.

D. Future Actions to Achieve Compliance

D.1 Future Actions Needed

The City is pursuing a phased approach to its ADA Self-Evaluation and Transition Plan. This first phase focused on self-evaluation, barrier prioritization, and initial barrier removal scheduling for curb ramp barriers in the public right-of-way.

The City owns/maintains other public right-of-way facilities as well as facilities of other types that were not part of the first phase of self-evaluation and will be evaluated for ADA barriers at a future update to the Plan. These facilities include but are not limited to:

- Public right-of-way: sidewalks, driveway interface with sidewalks, accessible parking and accessible pedestrian signals
- City buildings with publicly accessible areas
- City park facilities including building structures, restrooms, and recreational areas
- City trails

The City of Gig Harbor also provides programs, services and activities at its facilities. The City addressed the policy and procedure requirements identified in **Section B** as part of this initial phase. The City will conduct an internal self-assessment and barrier prioritization for programmatic barriers at a future update to the Plan.

Cost estimates for barrier removal for these outstanding facilities and programming will be included in a future update to the Plan.

D.2 Annual Report of Barriers Removed

To ensure implementation of this ADA Transition Plan, it is recommended that the City incorporate an annual review/update process to track ADA self-evaluation and barrier removal progress. It is recommended that the official responsible for implementation of the ADA Transition Plan coordinate this effort in cooperation with relevant City staff from other departments who are involved with projects that remove ADA barriers.

D.3 Five-Year ADA Transition Plan Update Schedule

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

E. Public Engagement

E.1 Public Engagement Strategy

The City's developed the following public engagement strategy to inform interested members of the public of the undertaking of this Plan and to invite participation in the process. This strategy included digital announcements, direct stakeholder engagement with existing contacts within and organizations that provide services to members of the ADA community, and opportunities for the general public to report ADA barriers and comment on the Draft Plan. For documentation of public engagement, see **Appendix F**.

E.1.1 Project Webpage

The project webpage content was launched in mid-October 2021. The project webpage included:

- Project description
- Schedule
- Public Involvement section:
 - Links to online surveys:
 - Map-enabled ArcGIS Survey123® version
 - Screen-reader friendly Survey Monkey® version
 - Virtual City Council meeting information
- City staff contacts and other ADA resources
- Documents section for posting the draft version for public comment
- Recent and annual accomplishments section for further tracking of ADA Transition Plan implementation progress

The ADA Transition Plan Project webpage is available at:

<https://www.cityofgigharbor.net/CivicAlerts.aspx?AID=759>

E.1.2 Web-Based Publications

The following web-based publications promoted the project, online surveys, and virtual City Council meeting in October with reminder posts through November 29, 2021:

- News Flash posting on City's website on October 15, 2021.
- Mayor's Facebook Live Q&A on October 22, 2021.
- Shared to Gig Harbor Positive Town Talk
- Shared on NextDoor
- Emailed to Constant Contact lists

E.1.3 Direct Engagement with Local ADA Community Organizations

City staff contacted the following organizations via direct e-mail in October 2021, to seek out interest in the online survey and public comment opportunities.

- Washington State Department of Services for the Blind <https://dsb.wa.gov/>
- Tacoma Area Coalition of Individuals with Disabilities <https://tacid.org/>
- Greater Gig Harbor Foundation – Gig Harbor Senior Center
<https://gigharborfoundation.org/ghseniorcenter>
- Gig Harbor Pierce County Library <https://www.piercecountylibrary.org/>
- Peninsula School District <https://www.psd401.net/>
- Saint Anthony's Hospital <https://www.chifranciscan.org/st-anthony-hospital.html>
- MultiCare Gig Harbor Medical Park <https://www.multicare.org/location/wic-gig-harbor/>
- Pierce County Aging and Disability Resources
<https://www.piercecountywa.gov/2128/About-Aging-Disability-Resources>
- PC Coalition for Development Disabilities <https://www.pc2online.org/>
- PAVE Partnerships for Action <https://wapave.org/>
- Support Services for Developmentally Disabled <https://www.supportservicesdd.org/>
- Disabled American Veterans <http://www.davwa.org/>

In addition, the following assisted living facilities were contacted:

- Heron's Key: https://www.heronskey.org/penrose-harbor/?utm_source=google&utm_medium=organic&utm_campaign=gmb&utm_content=ph
- The Lodge at Mallard's Landing: https://www.seniorservicesofamerica.com/senior-living/wa/gig-harbor/the-lodge-at-mallards-landing/?utm_source=GMB&utm_medium=organic
- Village Concepts of Gig Harbor: <https://villageconcepts.com/communities/village-concepts-of-gig-harbor-sound-vista-village/>
- ManorCare Health Services – Gig Harbor:
<https://promedicaskillednursing.org/GigHarbor>
- Family First Adult Family Homes: <https://www.familyfirstafh.com/>
- Atria Retirement - Peninsula <https://www.atriaretirement.com/retirement-communities/peninsula/>

E.1.4 Online Surveys

In consultation with City staff, a 3-5 minute survey was created on two digital platforms. The map-enabled ArcGIS Survey123® survey gave respondents the option to mark barrier locations on a map. The screen-reader friendly Survey Monkey® version was built to accommodate persons with visual disabilities. Links to the online surveys were activated from October 15 through November 30, 2021.

E.1.5 Public Hearing Opportunities

A presentation reviewing the Draft ADA Transition Plan was presented to the City of Gig Harbor's Public Works Committee at their meeting held November 9, 2021, on the Zoom® platform from 5:30-6:30pm. The Public Works Committee was open to the public for comment.

The same presentation on the Draft Plan was presented to the City of Gig Harbor City Council at their meeting held November 22, 2021, on the Zoom® platform from 5:30-6:30pm. This meeting was promoted on the ADA Transition Plan webpage for public comment.

Presentation materials were provided in accessible formats with alternative text prior to the event. The presentation explained the reasons for and required content of an ADA Transition Plan and the City's phased approach to self-evaluation and barrier removal implementation focused first on curb ramps within the public right-of-way. An open comment opportunity followed each presentation.

E.2 Public Engagement Findings

The virtual platform of online surveys, and virtual city meetings provided the public with an accessible and safe participation method in the midst of the COVID-19 pandemic. The findings are helpful in guiding City staff in the selection and prioritization of barrier removal. For further documentation, see **Appendix G**.

E.2.1 Online Survey Responses

The online SurveyMonkey® and ArcGIS Survey123® surveys yielded a combined total of 31 responses. 14 people submitted a survey on ArcGIS Survey123. 17 people submitted a survey on the Survey Monkey platform (some were paper surveys entered into the SurveyMonkey® platform by City staff). Some survey respondents identified barriers outside of City limits; this feedback is not included below. See **Table 13**.

Table 13. Survey Responses by Platform

Survey Platform	Number of Responses
ArcGIS Survey123®	14
SurveyMonkey®	17
Total	31

E.2.1.1 Narrative Survey Feedback

Beyond the ranking questions, narrative data from the surveys include the following themes:

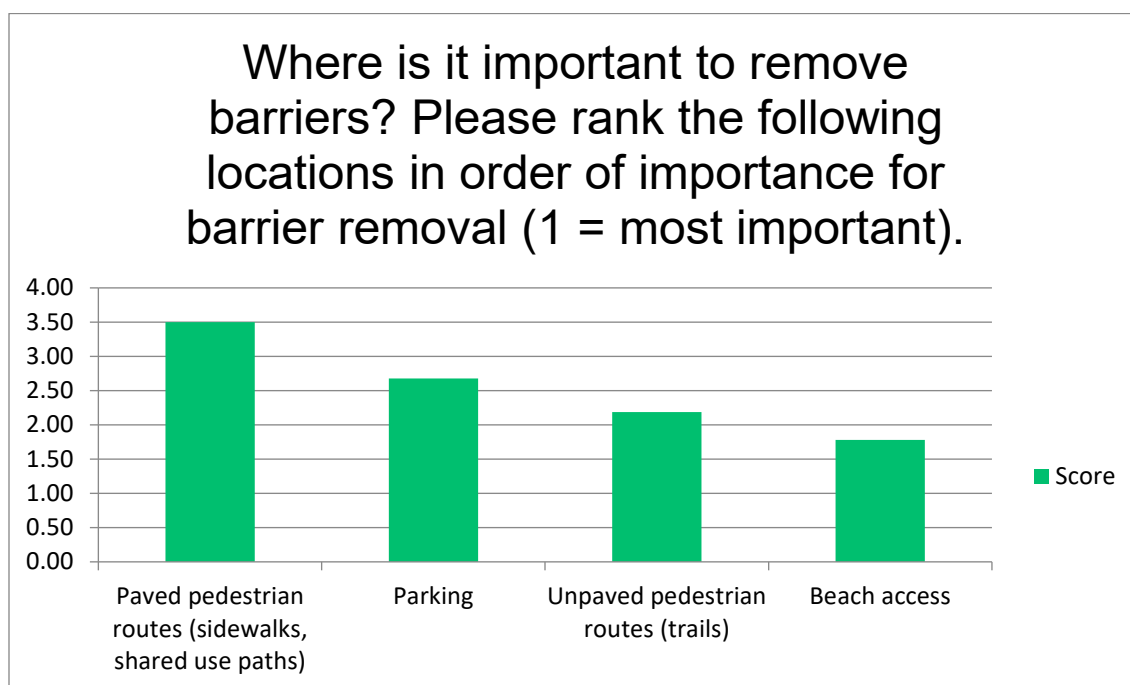
- **Sidewalks:** Many comments were sidewalk related regarding lack of paths and/or sidewalks, lack of ADA-compliant sidewalks, and sidewalk cracks/bumps that limit mobility. Locations identified include:
 - Lack of connection between the Harbor and Downtown districts.
 - Missing sidewalk along Gig Harbor Pierce County Library on 45th St Ct.
 - Near For the Love of Spice - elevation change is patched with asphalt.
 - Lack of ADA-compliant sidewalk up/down Pioneer Way, including downhill of Pioneer Duplex project above the intersection of Uddenberg Ln/Pioneer Way.
 - Lack of contiguous sidewalk citywide (two responses)
 - Trees planted in narrow sidewalk on North Harborview after turning from Vernhardsen near assisted living facility.
 - Rosedale St., including at Stinson roundabout.
 - Burnham Dr.
 - Harborview Dr has some uneven sidewalks with unexpected dips.
 - Sidewalk on Borgen Blvd on the Albertson's side switches to gravel.
 - Lack of sidewalk to southbound transit stop at Peacock Hill and Sellers St.
- **Ramps**
 - Problematic ramps on Library side of 45th St Ct.
 - Ramps in City Parks (steep approaches to restroom facilities, next to The Tides, Crescent Creek Park lower and upper tennis courts)
 - Galaxy Theatre brick path with narrow curb.
 - Harbor (no specific location(s) identified.
 - No ramp for Kaiser Permanente medical building near Fred Meyer.
- **Accessible Parking**
 - One respondent said they rarely go downtown due to lack of parking.
 - Request for van accessible parking further away from entrance to discourage small vehicles from parking in van access area.
 - Another respondent would like to see ordinances enforced and homeowners notified if they are blocking sidewalk access with parked vehicles.
- **Pedestrian Crossings**
 - Request for Cushman Trail crossing at Hollycroft St.
 - Request for cross walk on Pt Fosdick Rd from bus stop to library and for signalized crosswalk/feasibility study for this vicinity.
 - Skansie (46th) Ave at Hunt St: concern for potential conflicts between pedestrians crossing east to west and vehicles turning right onto Skansie from Hunt.
 - Request for more flashing pedestrian crossing signals.
- **Transit**
 - Mini Shelter for rainy days (no location provided).
 - Lack of space for southbound transit stop at Peacock Hill and Sellers St.

- **Other**
 - Request for handrails on steep sidewalks.
 - Request for ADA-accessible playground equipment (swing, no wood bark);
 - Request for more ADA accessible trails.
 - Lack of pedestrian paths in large parking lots, including to pond at YMCA.
 - Concern over motorized hoverboards, skateboards and bikes speeding on sidewalks.
- **Public Engagement Recommendations**
 - Inclusion of persons with disabilities in how the City creates accessibility.
 - Contact information for inclusive advocacy related to playgrounds.
 - See all known barriers on a map.
 - Comment regarding making barrier photo component of survey ADA accessible has been noted.

E.2.1.2 Ranked Question Survey Feedback

The results from both survey platform cohorts were combined to identify trends for all 29 survey respondents who completed ranked questions.

For both survey cohorts, the top priority location for barrier removal was paved pedestrian routes (sidewalks, shared use paths) barriers followed by parking, unpaved pedestrian routes (trails), and beach access barriers (see **Figure 10** and **Table 14**).

Figure 10. Combined Results for Results for Most Wanted Barrier Removal Locations by Score**Table 14. Combined Ranked Score for Results for Most Wanted Barrier Removal Locations**

Answer Options	Rank 1		Rank 2		Rank 3		Rank 4		# Surveys	Score
Paved pedestrian routes (sidewalks, shared use paths)	67.86%	19	21.43%	6	3.57%	1	7.14%	2	28*	3.50
Parking	17.86%	5	46.43%	13	21.43%	6	14.29%	4	28*	2.68
Unpaved pedestrian routes (trails)	3.70%	1	29.63%	8	48.15%	13	18.52%	5	27*	2.19
Beach Access	13.04%	3	4.35%	1	30.43%	7	52.17%	12	23*	1.78

*Some respondents did not rank all answer options.

For both survey cohorts, the most wanted barrier type for removal was missing curb ramps. (see **Figure 11** and **Table 15**).

Figure 11. Combined Results for Most Wanted Barrier Types for Removal by Score

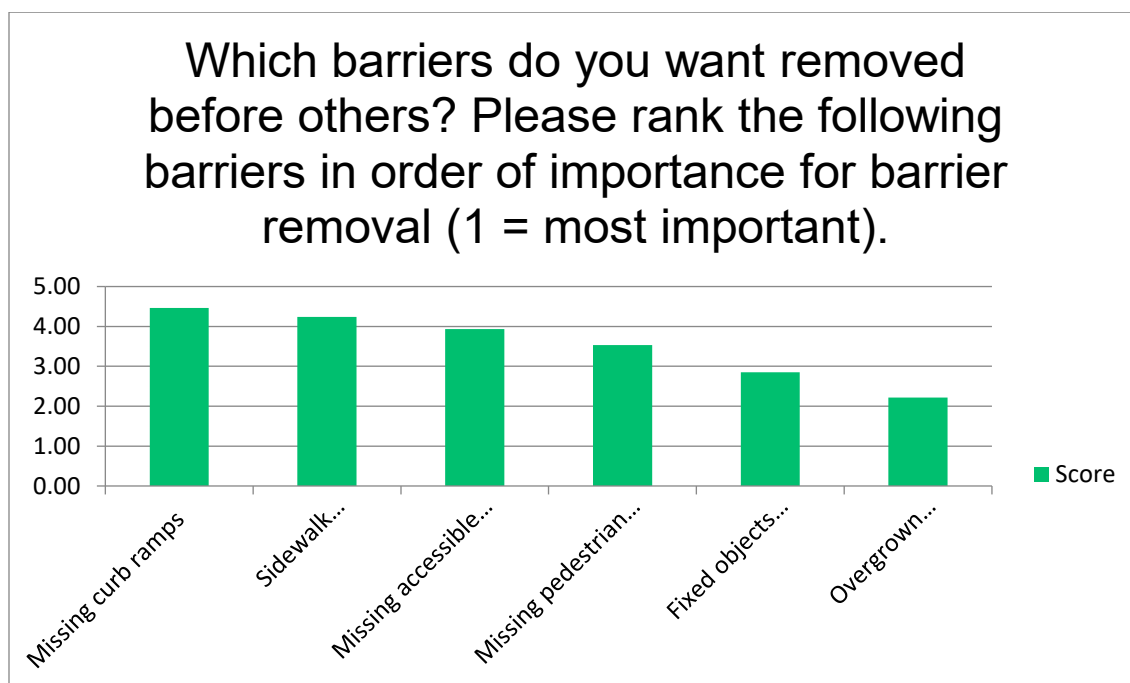


Table 15. Combined Ranked Score for Most Wanted Barrier Types for Removal

Answer Options	Rank 1		Rank 2		Rank 3		Rank 4		Rank 5		Rank 6		# Surveys	Score
Missing curb ramps	25.00%	7	28.57%	8	21.43%	6	17.86%	5	7.14%	2	0.00%	0	28*	4.46
Sidewalk cracks/ bumps	31.03%	9	17.24%	5	17.24%	5	20.69%	6	6.90%	2	6.90%	2	29	4.24
Missing accessible pedestrian signals	6.90%	2	20.69%	6	44.83%	13	17.24%	5	6.90%	2	3.45%	1	29	3.93
Missing pedestrian crossings	28.57%	8	10.71%	3	3.57%	1	21.43%	6	14.29%	4	21.43%	6	28*	3.54
Fixed objects in path of travel	3.70%	1	18.52%	5	14.81%	4	7.41%	2	33.33%	9	22.22%	6	27*	2.85
Overgrown vegetation in path of travel	7.14%	2	7.14%	2	0.00%	0	14.29%	4	28.57%	8	42.86%	12	28*	2.21

*Some respondents did not rank all answer options.

E.2.2 Public Hearing Comments

No public hearing comments were received at the City of Gig Harbor's Public Works Committee meeting held November 9, 2021. Committee members provided the following feedback on the Draft Plan:

- Councilmember Himes supported the prioritization methodology and foresaw challenges to reconcile best professional practice with citizen perspectives/public requests.
- Councilmember Woock identified the budget of ADA barrier removal would get larger when addressing other barriers (sidewalks, driveway interface with sidewalks, APS, parking, buildings, parks/trails, and programs).
- Councilmember Franich emphasized public survey responses related to accessible parking and a desire to see this barrier type prioritized.
- Mayor Kuhn inquired about the Plan's 25 year length; City staff shared the plan's horizon period is at the City Council's discretion and can be lengthened or shortened.
- Mayor Kuhn and Councilmember Franich asked about the City's standards for truncated domes and City staff explained that cast iron truncated domes are preferred but yellow ones are also used when aesthetically appropriate to match neighboring ramps.
- Councilmembers Himes and Franich expressed interest in exploring possibility of hiring additional Public Works staff person to design replacement ADA ramps in-house.

No public hearing comments were received at the City of Gig Harbor's City Council Meeting held November 22, 2021. Councilmembers provided the following feedback on the Draft Plan:

- Councilmember Woock shared that additional public surveys would be submitted on behalf of the Heron Keys senior living community.
- Councilmember Franich:
 - Asked if the curb ramp barriers were in a prioritized list and the project team confirmed this (see Appendix B2).
 - Noted that ADA-compliance requirements for buildings involve door pressure requirements or pushbutton requirements and requested the City use common sense to address these barriers. City staff noted that addressing building facility ADA barriers is not included in the current 25-year planning horizon of this Plan.
 - Requested that accessible parking be moved to a higher priority and to hire another Public Works employee to focus on ADA barrier removal.
- Councilmember Himes asked whether federal or state agencies check/approve a local agency's ADA Transition Plan. City staff responded there is no strict reporting element, except you must show the Department of Justice if they request it and must have a plan to be eligible for WSDOT federal highway transportation funding.
- Councilmember Rodenberg inquired about the cost estimate of \$15,000 per ramp. City staff responded that these are conservative cost estimates and that variable geography and grades affects individual ramp costs.

E.2.3 Draft ADA Transition Plan Public Comments

No public comments were received via email on the Draft ADA Transition Plan during the public comment period between November 9 and 30, 2021.

E.3 Recommendations

It is recommended that the City:

- Utilize the City of Gig Harbor ADA Transition Plan project webpage as a tool for future public outreach efforts related to ADA Transition Plan barrier removal progress updates.
- Utilize a GIS-enabled Survey123® survey and a SurveyMonkey® screen-reader friendly survey option to function as a barrier reporting tool for the public to report accessibility barriers.

F. Accessibility Regulations, Standards & Guidelines Resources

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

F.1 General Resources

Federal ADA Regulations

- [ADA Title II Regulations \(28 CFR Part 35\)](#)
- [ADA Title III Regulations \(28 CFR Part 36\)](#)

U.S. Access Board Standards

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

U.S. Department of Justice Guidelines

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

WSDOT Local Agency Guidelines

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

F.2 Barrier-Specific Resources

Curb Ramps:

- [ADA Title II Technical Assistance Manual](#)
- [Public Rights-of-Way Accessibility Guidelines \(PROWAG\) \(2011\)](#)
- [WSDOT Field Guide for Accessible Pedestrian Facilities \(2012\)](#)

Parking:

- [Facility \(Off-Street\) Accessible Parking \(2010 ADA Standards\)](#)
- [On-Street Accessible Parking \(2011 PROWAG\)](#)