

Comprehensive Accessibility Transition Plan Update

Introduction and Purpose

Pursuant to Title II of the Americans with Disabilities Act (“ADA”), agencies with more than 50 employees are required to make a transition plan. 28 CFR §35.150(d). Along with the ADA, The State of Washington has a much more broad definition of disability and as such, is obligated to provide reasonable accommodations on a larger scale.

In accordance with federal law, this transition plan must include a schedule for providing access features, including curb ramps for walkways. 28 CFR §35.150(d)(2). The schedule should first provide for pedestrian access upgrades to State and local government offices and facilities, transportation, places of public accommodation, and employers, followed by walkways serving other areas. 28 CFR §35.150(d)(2). The transition plan should accomplish the following:

- Identify physical obstacles in the public agency’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 upgrade pedestrian access to meet ADA and Section 504 requirements in each year following the transition plan; and
- Indicate the official responsible for implementation of the plan. 28 CFR §35.150(d)(3).

The Washington State Department of Transportation (“WSDOT”) submitted its initial transition plan in 1995. Since then, the agency has made significant progress toward making its facilities, programs and services accessible to people with disabilities. What is more, in the thirteen years since the original transition plan was initiated, new facilities have either been constructed or occupied, old facilities have been vacated, and increased litigation nationwide regarding ADA compliance, has validated the need to update the plan. Moreover, DOT Section 504 regulation requires FHWA to monitor the compliance of the self-evaluation and transition plans of Federal-aid recipients (49 CFR §27.11). The FHWA Division offices should review pedestrian access compliance with

the ADA and Section 504 as part of its routine oversight activities. Simply put, the plan should be updated periodically to ensure the ongoing needs of the community continue to be met.

In addition to carrying out the requirements as specified above, this update will:

- Serve as an authoritative operating document to ensure that WSDOT continues in its endeavor to comply with the ADA and Section 504 of the Rehabilitation Act (“Section 504”) in a responsive and progressive manner; and
- Provide an articulable and tangible manifestation of the agency’s commitment to the public to make certain its facilities, programs and services are accessible for people with disabilities.

Policy Statement of the Washington State Department of Transportation

The Washington State Department of Transportation will ensure that no qualified disabled individual shall, solely on the basis of his or her disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any of its programs, services, or activities as provided by Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990 (ADA). WSDOT further ensures that every effort will be made to provide nondiscrimination in all of its programs and activities regardless of the funding source. See Appendix 1: Chapter 4 of the *Equal Opportunity Desk Manual*

Complaint Procedure for Persons with Disabilities

WSDOT’s Office of Equal Opportunity is responsible for monitoring all ADA/504 compliance activities. The Office of Equal Opportunity, Internal Civil Rights Branch has been appointed to coordinate the Section 504/ADA provisions of 49 CFR § 27.13. The Office of Equal Opportunity may be contacted at 360-705-7085. Any individual, group of individuals, or entity that believes they have been subjected to discrimination prohibited by nondiscrimination requirements may file a complaint by contacting the Disability Program Manager/ADA Compliance Officer, Office of Equal Opportunity, at 360-705-7097. Written complaints may be sent to Washington State Department of

Transportation, Transportation Building, 310 Maple Park Avenue SE, Olympia, Washington 98504-7300.

Specifically as it relates to disability discrimination investigations, those procedures are outlined in Chapter Two of the *Equal Opportunity Desk Manual*. See Appendix 2.

Policy and Procedure Assessment

WSDOT OEO conducted an extensive review of its policies and procedures as they relate to their overall effectiveness in ensuring ADA/504 compliance, disability discrimination prevention and reasonable accommodation. While the agency has made significant strides in policy and procedure development and implementation, the following areas are either in need of creation or revision:

Reasonable Accommodation Procedures

In an effort to make certain that the agency utilizes best practices, The Office of Human Resources and OEO conducted a review of the reasonable accommodation procedures. This review revealed that current procedures were confusing and did not mirror the standards set forth by the EEOC. Furthermore, these procedures did not provide a process for applicants to secure accommodations. In response, the agency has revised its reasonable accommodation procedures. This revision also includes a series of forms designed to make tracking the accommodations more efficient and communication with the employee/applicant more responsive and easier to document. See Appendix 3.

Accessibility for Persons with Disabilities Policy

Although the agency, as reflected in its past and current practices, has had an established history of commitment to implement the requirements of the ADA and Section 504 and their implementing regulations and standards, WSDOT does not have a policy, which articulates this mandate in sufficient detail beyond its general policy statement of non-discrimination. Therefore, this policy will be developed by **February of 2009**.

ADA Design Policy and Standards

An ADA Design Policy and Standards ad-hoc committee was formed to ensure that the agency's policies and standards complied with the ADA and Section 504. Specifically, these policies and standards were reviewed to determine whether adjustments to the guidance were needed. Documents reviewed included the following:

- Design Manual
- Construction Manual
- Roadside Manual
- Standard Plans
- Other "stand-alone" guidance documents
- Identification of other opportunities to improve or clarify guidance

As a result of this committee's work, these guidance documents were updated in order to provide greater clarity with respect to ADA requirements in both design and construction. In addition, regulatory definitions were reviewed to comport with specific design feature accessibility requirements and new guidance documents were created to help ensure compliance. See Appendix 4. However, because accessibility regulations and standards evolve in direct response to the needs of the community, this guidance will need to be updated on an **on-going** basis.

Undue Hardship and Technical Feasibility

While the Department engages in both an undue hardship and technical feasibility analysis when making determinations with regard to ADA compliance, it does not have policies articulating the process by which such analysis should be done. Therefore, draft policies will be developed by **November 2008**.

Training

In order to educate the agency with regard to its obligations to comply with the ADA, several such initiatives are either being planned or are presently underway. These include the following:

Public Rights of Way Accessibility

The ADA Policy and Standards ad-hoc committee recognized that insufficient training existed for agency design and construction personnel with regard to ADA compliance in the right of way. Therefore, training has been developed to educate these employees and is customized to specific audiences. At present, two Headquarters Design Office employees are in the midst of conducting this training, via PowerPoint, to design and construction engineers statewide. See Appendix 5. Of course, as regulations change and with employee turnover, this training will be provided on an **on-going** basis and will be updated accordingly.

Reasonable Accommodation

WSDOT recognizes its obligation to provide reasonable accommodations to its employees. Even though the agency has an established policy and record of fulfilling this, the Office of Human Resources, in conjunction with OEO, has created training for Human Resource professionals and managers statewide in an attempt to demystify this process by offering tangible tools for navigation. See Appendix 6. This training will be conducted by OEO and the Office of Human Resources **starting in the summer of 2008 and continuing into the spring of 2009**. Also, in an effort to promote cultural competence within WSDOT, this will include training on disability etiquette and be provided on an **on-going** basis and will be updated as warranted.

Internal Communication Platforms

A key component to monitoring the effectiveness of the agency's ADA compliance program, is establishing communication platforms to document accessibility or program improvements. These tools will assist the agency in providing comprehensive data on an annual and sometimes, instantaneous, basis for the purpose of ensuring tangible progress in implementing the transition plan. The following two platforms are either in development or are currently in use:

Reasonable Accommodation Tracking

Prior to March of 2008, regional Human Resources professionals tracked reasonable accommodations using a traditional Excel spreadsheet. This process was labor intensive, especially in terms of final data tabulation for the entire agency. What's more, this system was unable to provide data trends for monitoring by OEO throughout the year. In response to these issues, OEO developed an online reasonable accommodation tracking system, which compiles, sorts and analyzes the data entered instantaneously. This system was operational March of 2008 and will be **upgraded by July of 2008** to include tracking identifiers, thereby increasing the functionality of the system for staff statewide. See Appendix 7.

ADA Facilities Improvement Tracking

Since the transition plan was initiated in 1995, there have been numerous ADA improvements made to agency buildings, rest areas, ferryboats, and terminals. However, no tool existed to provide the agency with comprehensive data on an annual and sometimes, instantaneous, basis for the purpose of tracking ADA facility improvements. Thus, WSDOT will develop an online tracking system for this purpose, including the costs associated with the improvements, by **October of 2008**. This data will then be reported to FHWA as a part of WSDOT's annual EEO Assurances.

External Communication Platforms

Online Public Right of Way and Curb Cut Accessibility Surveys

The public plays a vital role in assisting WSDOT in identifying deficiencies with respect to physical accessibility. Two new online surveys are in draft form, which will allow the public to give feedback on the accessibility of curb cuts and other right of way features. These surveys will be online and ready for public use by **October of 2008**. See Appendices 8 and 9.

ADA Website

At present, WSDOT's public and intranet sites contain ADA-related information in numerous locations. This makes it difficult for not only the public to access the information it needs; it is also difficult for employees to find guidance on topics in this arena. In order to address this, a workgroup has convened to develop a "one-stop website" containing information on topics such as: construction and design guidance, ferry accessibility, and reasonable accommodation. A prototype for this website will be developed by **February of 2009**.

Accessibility Advisory Committee

WSDOT has established the Accessibility Advisory Committee (AAC) as a part of an on-going effort to ensure that its facilities, programs and services are accessible to persons with disabilities in accordance with federal and state law. The AAC's involvement is critical to ensure that WSDOT actively addresses accessibility deficiencies that exist in its:

- Public use facilities
- Ferry vessels and terminals
- Right of Way
- Modes of communication

Furthermore, the AAC will foster communication and promote partnerships both internally and with external stakeholders statewide for the purpose of providing input to WSDOT in order to incorporate accessibility issues and planning into project design and construction as it relates to the agency's facilities, programs and services. It will also advise the agency regarding the implementation of the transition plan itself. See Appendix 10. Members will be selected, including two citizens with disabilities by the end of **May 2008** and the kickoff meeting will be held in **July of 2008**.

Information Technology Accessibility

Pursuant to RCW 43.105.041, the Information Services Board (ISB), has the authority to develop statewide or interagency technical policies, standards, and procedures related to information services. In 2005, the ISB enacted Policy 1000-G1: State Guidelines – Accessibility to Information Technology for Individuals with Disabilities. See Appendix 11. These guidelines were developed to:

- Provide the public and employees, including individuals with disabilities, access to information technology.
- Provide agency staff with information necessary to procure, develop, and maintain information technology that is accessible to all individuals.

This policy directs state agencies to implement the Section 508 Standards and World Wide Web (W3C) Guidelines to provide equal access to information technology for employees and the public, including individuals with disabilities. As of this writing, WSDOT has made an array of improvements to its website including enhancements for text readers. However, because of the vast expanse of WSDOT's electronic information system, overall accessibility and functionality of this system for persons with disabilities needs to be assessed. For example, the agency is in the process of making sure that its PDF documents can be read with screen readers. Therefore, OEO will initiate discussions with WSDOT Communications on what needs to be done in order to improve access to information technology by **July of 2008**.

ADA/Reasonable Accommodation Statements

In 2006, OEO revised WSDOT's ADA/reasonable accommodation statements it publishes on agency publications. See Appendix 12.

Facility Accessibility

Internal ADA Compliance Assessments

WSDOT Facilities has identified 81 public-use buildings in addition to ferry terminals and rest areas. See Appendix 13. In order to ease the identification of where these buildings are located, a map was developed. See Appendix 14. In addition, WSDOT facilities provided an internal ADA compliance research report, indicating barriers that needed removal and including the dates such removal was targeted to take place. See Appendix 15.

Independent ADA Compliance Assessments

Because persons with disabilities are often in the best place to identify barriers to accessibility, OEO and WSDOT's Facilities Office, has contracted with State Independent Living Centers (SILC's) to conduct independent ADA compliance assessments of agency facilities. SILC's are non-residential, private, non-profit, consumer-controlled, community-based organizations providing services and advocacy by and for persons with all types of disabilities. Their goal is to assist individuals with disabilities to achieve their maximum potential within their families and communities. Also, SILC's serve as a strong advocacy voice on a wide range of national, state and local issues. They work to assure physical and programmatic access to housing, employment, transportation, communities, recreational facilities, and health and social services. This activity also satisfies, in part, the requirement of public involvement in this plan, a commitment which the agency shares as well – the federal mandate notwithstanding.

As of this writing, assessments have been completed in the Olympic, Eastern and South West Regions. Generally, the SILC consumers or representatives were accompanied by a regional OEO staff person during the on-site assessments. In addition, they were provided with an ADA compliance checklist as a resource tool for identifying barriers. See Appendix 16. The individual assessments can be referenced as follows:

- Eastern Region: See Appendix 17
- Olympic Region: See Appendix 18
- South West Region: See Appendix 19
- North West Region: See Appendix 20

Barriers Identified by Region and Facility Name

Eastern Region

Headquarters

- Public Waiting Area Service Counter exceeds ADAAG standards for height at 43.5 inches. See ADAAG 4.32.4.¹
- Accessible Entrance: The door opening force exceeds the 5 lbf. Minimum recommended. See ADAAG A4.13.11.² The exterior doors tested between 10 to 15 lbf. And the interior doors tested 7lbf.
- The telephone located in the Whitman County Room is 60 inches high and should be lowered. See ADAAG 4.2.5 and 4.2.6 respectively.³

Cle Elum Maintenance Facility

Emergency Egress

- Visible and audible alarms must be installed See FN 11.

Hallways and Corridors

- Directly after coming off of the lift (upstairs) there is a reasonable amount of space in the travel area for someone in a wheelchair – however, there is a couch that is directly outside of the upstairs lift entrance that reduces the amount of travel space to 33". (minimum should be 36").

¹ **Height of Tables or Counters.** The tops of accessible tables and counters shall be from 28 in to 34 in (710 mm to 865 mm) above the finish floor or ground.

² **Door Opening Force.** Although most people with disabilities can exert at least 5 lbf (22.2N), both pushing and pulling from a stationary position, a few people with severe disabilities cannot exert 3 lbf (13.13N).

³ **Forward Reach.** If the clear floor space only allows forward approach to an object, the maximum high forward reach allowed shall be 48 in (1220 mm). The minimum low forward reach is 15 in (380 mm). **Side Reach.** If the clear floor space allows parallel approach by a person in a wheelchair, the maximum high side reach allowed shall be 54 in (1370 mm) and the low side reach shall be no less than 9 in (230 mm) above the floor

- In addition, this hallway leads to a public use counter, however, the counter is 42" high (maximum should be 36") See FN 1.

Stair Lift

- The lift door on the lower level is inaccessible in that it cannot be used with a closed fist See FN 18.

Doors

- The accessible unisex restroom entry door had accessible handles although it took approx 10 lbf of force (5 lbf is max.) to open. Thus, the door should be adjusted See FN 2.
- The door knob to the accessible stall could not be used with a closed fist and should be changed See FN 18.
- The mirror was out of tolerance at 49" (max 40" from floor to bottom of reflective surface) See FN 22.

Drinking Fountains

- The fountain did not have a clear floor space of at least 30 by 48 inches in front of it. The fountain is a distance of 45" from the floor to the spout (max. should be 36"). However, the use of paper cup dispensers is acceptable but must be kept filled. Also, the fountain was inaccessible as it had just one on/off push button located on the top right side. And was 9" from the floor to the bottom of the unit and protruded more than 4" from the wall. See FN 13.

Colfax Maintenance Headquarters

Entrance

- The maximum force should be adjusted on this door to not exceed 5 lbf. See FN 2.
- The force of front and back accessible entrances should be adjusted on these doors to not exceed 5 lbf. See FN 2.

Lobby

- There are a couple of bins that are used for pamphlets, maps and miscellaneous papers for the public. These bins were placed on the wall 53" from the floor to the

top of the bin. Lowering these would make these bins more accessible for people in wheelchairs.

Hallways and Corridors

- There is a door the public must go through to go from the lobby area to the public restrooms, this door, is a bit heavy to open requiring 10 lbf to open. We recommend this door be adjusted to require 5lbf maximum to open. See FN 2.

Restrooms

- The door to the restroom required 15 lbf to open and should be adjusted to require 5lbf or less to open See FN 2.
- The mirror was a bit high at 47" from the floor to the bottom edge and should be moved to not be any more than 40" from the floor See FN 22.

Davenport Maintenance Office

Entrance

- The accessible entrance to this facility has a glass door. Upon opening force testing the door tested at 10 lbf. The maximum force should be adjusted on this door to not exceed 5 lbf. See FN 2.

Lobby

- In the lobby there are a couple of bins that are used for pamphlets and miscellaneous papers for the public. These bins were placed on the wall 54" from the floor to the top of the bin and another at 45" from the floor to the top of the bin. Lowering at least the top bin would make these bins more accessible for people in wheelchairs.

Eastern Region Local Programs

Emergency Egress

- This entire building is without visible or audible alarms See FN 6.

Hallways and Corridors

- Throughout this building in the public access hallways there was a minimum of 36" wide travel route to public areas with one exception; near a set of file cabinets directly to the left of the entry, the file cabinets extend into the path of travel and the clearance for travel is 32" See FN 8.

Entrance

- This door needs adjustment as it currently takes 12 lbf of force to open. (max. should be 5 lbf). See FN 2.

Eastern Region Materials Laboratory

Entrance

The door is out of compliance as it takes 11 lbf of force to open this door (5 lbf max). See FN 2.

Restrooms

- There was a desk in front of the paper towel dispenser and a trash can in front of the soap dispenser that requires moving in order to provide an accessible route of travel See FN 8.

Drinking Fountain

- The fountain was positioned on the wall 21" off the floor and protruded approximately 10" into the circulation path and was not cane detectable.

Pasco Area Office and Shop

Entrance

- Upon opening force testing the door tested at 15 lbf. The maximum force should be adjusted on this door to not exceed 5 lbf. See FN 2.
- The accessible entrance to the meeting/conference room and restrooms is without any signage and has a single, level entry door. The door to this entrance has a lever type handle and required 14 lbf to open this door should be adjusted to require 5 lbf or less to be opened. See FN 2 and 7 respectively.

Restrooms

- The rest rooms located in this complex did not have adequate signage, with Braille, pictograms/symbols, and raised lettering See FN 7.
- The men's door needs adjusted to require 5-lbf max to open See FN 2.
- The door knobs on the men's and women's restrooms would not be easily utilized by someone using a closed fist. See FN 18.
- The stalls in both the men's and women's rooms had doorknobs that are not easily operable with a closed fist and should be changed See FN 18.

- There are no grab bars in the men's restroom. See FN 23.
- The mirrors were at 49" from the floor to the bottom edge of the reflective surface in the men's room and 48" in the women's room – both mirrors should be moved to be within 40" from the floor to the edge of the reflective surface or lower See FN 22.

Real Estate Services Building

Restrooms

- The doors took 10 lbf for the women's room and 6 lbf for the men's room to open therefore these should be adjusted to require less than the 5 lbf maximum to open See FN 2.
- The stall doors had the older style doorknobs and are not operable with a closed fist See FN 18.

Area 2 Maintenance Office

Entrance

- The force required to open this front door was 16 lbf and therefore needs to be adjusted See FN 2.

Meeting Room

- The entry and doors opened with 21 lbf and should, therefore, be adjusted See FN 2.
- The signage outside this room reads "Conference Room" and is without Braille or pictograms See FN 7.

Union Gap District Office

Ramps

- Ramp railings at the front entrance are too low and should be raised See FN 9.

Entrance

- The force to open these doors was a bit high and need adjustment as the outside door took 12 lbf and the inside door required 8 lbf (Maximum should be 5 lbf). See FN 2.

Walla Walla Maintenance Office

Entrance

- Upon opening force testing the outer door tested at 12 lbf and the interior door tested at 8 lbf. Additionally, the doors to the meeting room entrance required 8 lbf for the door on the east side and 12 lbf for the door on the west side. Therefore, they should be adjusted accordingly See FN 2.

Restrooms

- The restroom doors took approx 10 lbf of force for both the men's and women's rooms and 12 lbf for the unisex restroom to open and should be adjusted accordingly. See FN 2.
- The stalls in both the men's and women's restrooms rooms had doorknobs that are not easily operable with a closed fist and should be changed. Also, the faucet handles in each case are inadequate and should be changed to be usable with a closed fist. See FN 18.

Olympic Region

Headquarters

Accessible Entrance

- The entire frontage sidewalk curb ramps need landings. See ADAAG 4.8.4.⁴
- The slope from the ramp to the main entrance is acceptable. However, from the sidewalk to the north ramp, the slope exceeds 1:12 and needs a larger landing for a wheelchair user to safely navigate the ramp. See ADAAG 4.8.2 and FN 4.⁵

⁴ **Landings.** Ramps shall have level landings at bottom and top of each ramp and each ramp run. Landings shall have the following features: (1) The landing shall be at least as wide as the ramp run leading to it. (2) The landing length shall be a minimum of 60 in (1525 mm) clear. (3) If ramps change direction at landings, the minimum landing size shall be 60 in by 60 in (1525 mm by 1525 mm). (4) If a doorway is located at a landing, then the area in front of the doorway shall comply with 4.13.6

⁵ **Slope and Rise.** The least possible slope shall be used for any ramp. The maximum slope of a ramp in new construction shall be 1:12. The maximum rise for any run shall be 30 in (760 mm).

- The back inaccessible entrance needs a sign indicating the location of the accessible entrance.
- The main door, not the accessible entrance, opening force may exceed the 5 lbf. Minimum recommended. See FN 2.

Parking

- The sidewalk by the accessible entrance is tilted and needs maintenance. In addition, the paint on the access aisle is worn.

Emergency Egress

- The main front entrance does not have a visible and audible alarm. See ADAAG 4.2.8.⁶

⁶ **4.28.1 General.** Alarm systems required to be accessible by 4.1 shall comply with 4.28. At a minimum, visual signal appliances shall be provided in buildings and facilities in each of the following areas: restrooms and any other general usage areas (e.g., meeting rooms), hallways, lobbies, and any other area for common use. **4.28.2* Audible Alarms.** If provided, audible emergency alarms shall produce a sound that exceeds the prevailing equivalent sound level in the room or space by at least 15 dbA or exceeds any maximum sound level with a duration of 60 seconds by 5 dbA, whichever is louder. Sound levels for alarm signals shall not exceed 120 dbA.

4.28.3* Visual Alarms. Visual alarm signal appliances shall be integrated into the building or facility alarm system. If single station audible alarms are provided then single station visual alarm signals shall be provided. Visual alarm signals shall have the following minimum photometric and location features: (1) The lamp shall be a xenon strobe type or equivalent. (2) The color shall be clear or nominal white (i.e., unfiltered or clear filtered white light). (3) The maximum pulse duration shall be two-tenths of one second (0.2 sec) with a maximum duty cycle of 40 percent. The pulse duration is defined as the time interval between initial and final points of 10 percent of maximum signal. (4) The intensity shall be a minimum of 75 candela. (5) The flash rate shall be a minimum of 1 Hz and a maximum of 3 Hz. (6) The appliance shall be placed 80 in (2030 mm) above the highest floor level within the space or 6 in (152 mm) below the ceiling, whichever is lower. (7) In general, no place in any room or space required to have a visual signal appliance shall be more than 50 ft (15 m) from the signal (in the horizontal plane). In large rooms and spaces exceeding 100 ft (30 m) across, without obstructions 6 ft (2 m) above the finish floor, such as auditoriums, devices may be placed around the perimeter, spaced a maximum 100 ft (30 m) apart, in lieu of suspending appliances from the ceiling. (8) No place in common corridors or hallways in which visual alarm signaling appliances are required shall be more than 50 ft (15 m) from the signal. **4.28.4* Auxiliary Alarms.** Units and sleeping accommodations shall have a visual alarm connected to the building emergency alarm system or shall have a standard 110-volt electrical receptacle into which such an alarm can be connected and a means by which a signal from the building emergency alarm system can trigger such an auxiliary alarm. When visual alarms are in place the signal shall be visible in all areas of the unit or room. Instructions for use of the auxiliary alarm or receptacle shall be provided.

- Furniture blocks part of the doorway of the Regional Administrator's office and should be rearranged to provide adequate space to enter.

Signage

- The Boardroom sign is not mounted 60 inches from the floor. The companion sign mounted on the door is not in Braille. See ADAAG 4.30.4 and 4.30.6.⁷

Usability of Accessible Restrooms

- The designated accessible men's restroom is inaccessible based on the following barriers:
 - The entry configuration does not provide adequate maneuvering space for a wheelchair-user. See ADAAG 4.3.4.⁸
 - The telephone next to the Boardroom is too high. See FN 3.

⁷ **Raised and Brailled Characters and Pictorial Symbol Signs (Pictograms).** Letters and numerals shall be raised 1/32 in (0.8 mm) minimum, upper case, sans serif or simple serif type and shall be accompanied with Grade 2 Braille. Raised characters shall be at least 5/8 in (16 mm) high, but no higher than 2 in (50 mm). Pictograms shall be accompanied by the equivalent verbal description placed directly below the pictogram. The border dimension of the pictogram shall be 6 in (152 mm) minimum in height. **Mounting Location and Height.** Where permanent identification is provided for rooms and spaces, signs shall be installed on the wall adjacent to the latch side of the door. Where there is no wall space to the latch side of the door, including at double leaf doors, signs shall be placed on the nearest adjacent wall. Mounting height shall be 60 in (1525 mm) above the finish floor to the centerline of the sign. Mounting location for such signage shall be so that a person may approach within 3 in (76 mm) of signage without encountering protruding objects or standing within the swing of a door.

⁸ **Passing Space.** If an accessible route has less than 60 in (1525 mm) clear width, then passing spaces at least 60 in by 60 in (1525 mm by 1525 mm) shall be located at reasonable intervals not to exceed 200 ft (61 m). A T-intersection of two corridors or walks is an acceptable passing place.

Olympic Region Traffic Design and Operations

Ramps

- The ramp at the main entrance needs a railing on both sides. See ADAAG 4.8.5.⁹ In addition, this ramp may not be non-slip, as it is need of more paint. See FN 9.

Parking and Drop off Areas

- Access aisles for the accessible parking need to be painted.

Entrance

- The inaccessible entrance (main stairway) should have signage indicating the location of the accessible entrance (ramp).

Doors

⁹ **Handrails.** If a ramp run has a rise greater than 6 in (150 mm) or a horizontal projection greater than 72 in (1830 mm), then it shall have handrails on both sides. Handrails are not required on curb ramps or adjacent to seating in assembly areas. Handrails shall comply with 4.26 and shall have the following features: (1) Handrails shall be provided along both sides of ramp segments. The inside handrail on switchback or dogleg ramps shall always be continuous. (2) If handrails are not continuous, they shall extend at least 12 in (305 mm) beyond the top and bottom of the ramp segment and shall be parallel with the floor or ground surface. (3) The clear space between the handrail and the wall shall be 1 - 1/2 in (38 mm). (4) Gripping surfaces shall be continuous. (5) Top of handrail gripping surfaces shall be mounted between 34 in and 38 in (865 mm and 965 mm) above ramp surfaces. (6) Ends of handrails shall be either rounded or returned smoothly to floor, wall, or post. (7) Handrails shall not rotate within their fittings

- The entrance door exceeds the 5 lbf. Opening force and closes too quickly. See FN 2.

Signage

- Directional signage (i.e., the location of the bathroom) is needed throughout the building and needs to be in Braille. See FN 7.

Purchasing and Supply

Signage

- Signage is needed indicating the location of the accessible entrance and should be in Braille. See FN 7.

Doors

- There is a one inch non-beveled threshold at the main entrance. This should be reduced by a quarter-of-an-inch. See ADAAG 4.13.8.¹⁰

¹⁰ **Thresholds at Doorways.** Thresholds at doorways shall not exceed 3/4 in (19 mm) in height for exterior sliding doors or 1/2 in (13 mm) for other types of doors. Raised thresholds and floor level changes at accessible doorways shall be beveled with a slope no greater than 1:2

Emergency Egress

- Visible and audible alarms must be installed. See ADAAG 4.28.2 and 4.28.3 respectively.¹¹

Lakeview Maintenance Facility

Route of Travel

- The curb cut from the parking lot has broken asphalt and at the seam that does not provide a stable, firm and slip resistant route of travel and needs to

¹¹ **Audible Alarms.** If provided, audible emergency alarms shall produce a sound that exceeds the prevailing equivalent sound level in the room or space by at least 15 dbA or exceeds any maximum sound level with a duration of 60 seconds by 5 dbA, whichever is louder. Sound levels for alarm signals shall not exceed 120 dbA. **Visual Alarms.** Visual alarm signal appliances shall be integrated into the building or facility alarm system. If single station audible alarms are provided then single station visual alarm signals shall be provided. Visual alarm signals shall have the following minimum photometric and location features: (1) The lamp shall be a xenon strobe type or equivalent. (2) The color shall be clear or nominal white (i.e., unfiltered or clear filtered white light). (3) The maximum pulse duration shall be two-tenths of one second (0.2 sec) with a maximum duty cycle of 40 percent. The pulse duration is defined as the time interval between initial and final points of 10 percent of maximum signal. (4) The intensity shall be a minimum of 75 candela. (5) The flash rate shall be a minimum of 1 Hz and a maximum of 3 Hz. (6) The appliance shall be placed 80 in (2030 mm) above the highest floor level within the space or 6 in (152 mm) below the ceiling, whichever is lower. (7) In general, no place in any room or space required to have a visual signal appliance shall be more than 50 ft (15 m) from the signal (in the horizontal plane). In large rooms and spaces exceeding 100 ft (30 m) across, without obstructions 6 ft (2 m) above the finish floor, such as auditoriums, devices may be placed around the perimeter, spaced a maximum 100 ft (30 m) apart, in lieu of suspending appliances from the ceiling. (8) No place in common corridors or hallways in which visual alarm signalling appliances are required shall be more than 50 ft (15 m) from the signal.

be repaired In addition, bushes along the walkway need to be trimmed in order to provide an accessible route. See ADAAG 4.5.1.¹²

Entrance

- Just inside of the entrance, there is a chair just to the right of the door handle that should be relocated in order to provide full access to the door.
- This door's opening force appears to exceed 5 lbf. And should be adjusted. See FN 2.

Rooms and Spaces

- In the lobby, there is a countertop, which protrudes into the room by 36 inches, thereby making it impossible for someone with a cane to detect its presence. See ADAAG 4.4.1.¹³

Signage

- The main exterior door needs signage in Braille. See FN 7.

Restrooms

- Both the men's and women's restrooms are inaccessible and need to be reconfigured as follows:
 - Door handles are too high
 - Doors exceed opening force requirements

¹² Ground and floor surfaces along accessible routes and in accessible rooms and spaces including floors, walks, ramps, stairs, and curb ramps, shall be stable, firm, slip-resistant.

¹³ Objects projecting from walls (for example, telephones) with their leading edges between 27 in and 80 in (685 mm and 2030 mm) above the finished floor shall protrude no more than 4 in (100 mm) into walks, halls, corridors, passageways, or aisles (see Fig. 8(a)). Objects mounted with their leading edges at or below 27 in (685 mm) above the finished floor may protrude any amount (see Fig. 8(a) and [\(b\)](#)). Free-standing objects mounted on posts or pylons may overhang 12 in (305 mm) maximum from 27 in to 80 in (685 mm to 2030 mm) above the ground or finished floor (see Fig. 8(c) and [\(d\)](#)). Protruding objects shall not reduce the clear width of an accessible route or maneuvering space (see Fig. 8(e))

- Configuration of restrooms provide inadequate maneuvering space for a wheelchair user.
- Stall doors exceed 5lbf. Opening force.
- Men's towel dispenser is too high.

Port Orchard Facility

Ramps

- The ramp does not have a six foot railing on both sides. See FN 9.

Parking

- The accessible spaces are not closest to the accessible entrance. See ADAAG 4.6.2.¹⁴
- The accessible spaces are not marked with the International Symbol of Accessibility and there are no signs reading: "Van Accessible" at van spaces. See ADAAG 4.6.4.¹⁵

Port Angeles Facility

Route of Travel

- There is no curb cut, as the walkway from east to west ends – a curb cut must, therefore, be installed. See 4.7.1.¹⁶

¹⁴ **Location.** Accessible parking spaces serving a particular building shall be located on the shortest accessible route of travel from adjacent parking to an accessible entrance. In parking facilities that do not serve a particular building, accessible parking shall be located on the shortest accessible route of travel to an accessible pedestrian entrance of the parking facility. In buildings with multiple accessible entrances with adjacent parking, accessible parking spaces shall be dispersed and located closest to the accessible entrances.

¹⁵ **Signage.** Accessible parking spaces shall be designated as reserved by a sign showing the symbol of accessibility (see 4.30.7). Spaces complying with 4.1.2(5)(b) shall have an additional sign "Van-Accessible" mounted below the symbol of accessibility. Such signs shall be located so they cannot be obscured by a vehicle parked in the space.

¹⁶ **Location.** Curb ramps complying with 4.7 shall be provided wherever an accessible route crosses a curb.

Parking

- Accessible parking spaces need repainting.

South West Region

South West Region Headquarters

Parking

- There are no signs reading: “Van Accessible” at van spaces. See FN 15.

Entrance

- The inaccessible entrance should have signage indicating the location of the accessible entrance.

Doors

- The rear entrance of the Conference Room exceeds the 5 lbf. Opening force requirement. See FN 2.

Main Street Maintenance Facility

Approach

- The sidewalks providing pedestrian access to this building have curb cuts, which have slopes that exceed regulation. See FN 5.

Entrance

- The space between the door and the stairs does not provide enough space for a wheelchair user to open the door. See FN 3 and 9.

Doors

- The entrance door exceeds the 5 lbf. Opening force requirement. See FN 2.

Emergency Egress

- Visible and audible alarms must be installed. See FN 11.

Restroom

- The soap dispenser in the accessible bathrooms are too high and out of reach. See FN 12.

Drinking Fountain

- The cup dispenser is mounted too high. See FN 12.

Kelso Professional Engineer Office

Ramp

- The ramp does not have a six foot railing on both sides and is not non-slip. See FN 9.

Signage

- Alternate signs need signage indicating accessibility.

Doors

- The entrance door exceeds the 5 lbf. Opening force requirement. See FN 2.
- Signage for goods and services are not present at doorways. See ADAAG 4.30¹⁷.

¹⁷ **Signage. 4.30.1* General.** Signage required to be accessible by 4.1 shall comply with the applicable provisions of 4.30. **4.30.2* Character Proportion.** Letters and numbers on signs shall have a width-to-height ratio between 3:5 and 1:1 and a stroke-width-to-height ratio between 1:5 and 1:10. **4.30.3 Character Height.** Characters and numbers on signs shall be sized according to the viewing distance from which they are to be read. The minimum height is measured using an upper case X. Lower case characters are permitted.

Height Above Finished Floor	Minimum Character Height
Suspended or Projected Overhead in compliance with 4.4.2	3 in (75 mm) minimum

4.30.4* Raised and Brailled Characters and Pictorial Symbol Signs (Pictograms). Letters and numerals shall be raised 1/32 in (0.8 mm) minimum, upper case, sans serif or simple serif type and shall be accompanied with Grade 2 Braille. Raised characters shall be at least 5/8 in (16 mm) high, but no higher than 2 in (50 mm). Pictograms shall be accompanied by the equivalent verbal description placed directly below the pictogram. The border dimension of the pictogram shall be 6 in (152 mm) minimum in height. **4.30.5* Finish and Contrast.** The characters and background of signs shall be eggshell, matte, or other non-glare finish. Characters and symbols shall contrast with their background -- either light characters on a dark background or dark characters on a light background. **4.30.6 Mounting Location and Height.** Where permanent identification is provided for rooms and spaces, signs shall be installed on the wall adjacent to the

Emergency Egress

- Visible and audible alarms must be installed. See FN 11.

Kelso Maintenance Building

Ramps

- The ramp at the entrance needs non-slip material. See FN 9.

Entrance

- The alternative entrance's threshold is too high and needs to be lowered. See FN 10.

Doors

- The entrance door and other interior doors, including restrooms, exceed the 5 lbf. Opening force requirement. See FN 2.

Emergency Egress

- Visible and audible alarms must be installed. See FN 11.

latch side of the door. Where there is no wall space to the latch side of the door, including at double leaf doors, signs shall be placed on the nearest adjacent wall. Mounting height shall be 60 in (1525 mm) above the finish floor to the centerline of the sign. Mounting location for such signage shall be so that a person may approach within 3 in (76 mm) of signage without encountering protruding objects or standing within the swing of a door.

4.30.7* Symbols of Accessibility. (1) Facilities and elements required to be identified as accessible by 4.1 shall use the international symbol of accessibility. The symbol shall be displayed as shown in Fig. 43(a) and (b). **(2)** Volume Control Telephones. Telephones required to have a volume control by 4.1.3(17)(b) shall be identified by a sign containing a depiction of a telephone handset with radiating sound waves. **(3)** Text Telephones (TTYs). Text telephones (TTYs) required by 4.1.3(17)(c) shall be identified by the international TTY symbol (Fig 43(c)). In addition, if a facility has a public text telephone (TTY), directional signage indicating the location of the nearest text telephone (TTY) shall be placed adjacent to all banks of telephones which do not contain a text telephone (TTY). Such directional signage shall include the international TTY symbol. If a facility has no banks of telephones, the directional signage shall be provided at the entrance (e.g., in a building directory). **(4)** Assistive Listening Systems. In assembly areas where permanently installed assistive listening systems are required by 4.1.3(19)(b) the availability of such systems shall be identified with signage that includes the international symbol of access for hearing loss (Fig 43(d)).

Restrooms

- Directional signage is needed at inaccessible bathrooms indicating the location of the accessible bathrooms. See FN 17.

Chehalis Professional Engineer Office

Doors

- The men's restroom door exceeds the 5 lbf. Opening force requirement. See FN 2.

Goldendale Office

- Visible and audible alarms must be installed. See FN 11.

North West Region

Corson Materials Lab

Parking

- The pavement paint is worn off at the van accessible spaces and should be repainted.

Doors

- Restroom doors handles are too high and not operable with a closed fist. See ADAAG 4.13.9¹⁸.

Restrooms

¹⁸ **Door Hardware.** Handles, pulls, latches, locks, and other operating devices on accessible doors shall have a shape that is easy to grasp with one hand and does not require tight grasping, tight pinching, or twisting of the wrist to operate. Lever-operated mechanisms, push-type mechanisms, and U-shaped handles are acceptable designs. When sliding doors are fully open, operating hardware shall be exposed and usable from both sides. Hardware required for accessible door passage shall be mounted no higher than 48 in (1220 mm) above finished floor.

- Restrooms lack a five foot circle or T-shaped space for turning a wheelchair completely. See ADDAG 4.2.3¹⁹.
- In the women's restroom, there is a large shelf, which impedes wheelchair mobility and should be moved.

Signage

- Directional and/or Goods and Services signage is currently located in an alcove, thereby making them invisible from the hallway. Braille signage is especially needed indicating the hallway near the alcove.

Counters

- Main service counter is too high and should be lowered or an auxiliary service counter should be provided. See FN 1.

Building 17BA-01 (Administration)

Emergency Egress

- Visible and audible alarms must be installed. See FN 11.

Signage

- Braille signage needs to be installed at the Conference Room door. In addition, there is no tactile signage identifying the restrooms. See FN 17.

Entrances

- The entrance to the elevator needs to be widened as it is only 31 inches. See ADDAG 4.13.5²⁰.

Restrooms

- Stalls need to be reconfigured to comply with ADDAG 4.17.3²¹.

¹⁹ **Wheelchair Turning Space.** The space required for a wheelchair to make a 180-degree turn is a clear space of 60 in (1525 mm) diameter (see Fig. 3(a)) or a T-shaped space (see Fig. 3(b)).

²⁰ **Clear Width.** Doorways shall have a minimum clear opening of 32 in (815 mm) with the door open 90 degrees, measured between the face of the door and the opposite stop (see Fig. 24(a), (b), (c), and (d)). Openings more than 24 in (610 mm) in depth shall comply with 4.2.1 and 4.3.3 (see Fig. 24(e)).

- Paper towel dispenser is too high. See ADAAG 4.27.3²².

Facilities Compliance Plan

As of this writing, independent ADA compliance assessments need to be completed for all of the regions with the exception of the South West and Eastern regions. In addition, the rest areas need to be assessed for accessibility. Notwithstanding the data provided above, these compliance checks are **on-going** and will be completed by no later than **June of 2009**. Once a complete set of accessibility data is available, this will be given to Facilities to verify the existence of the deficiencies cited and when they will be addressed. These dates, in their entirety, will be provided by **September of 2009**.

Summary of Action Items

Action Item	Projected Date of Completion
Accessibility for Persons with Disabilities Policy	February of 2009
Updating Construction and Design Guidance	On-going, as needed
Public Rights of Way Accessibility Training	On-going, currently being conducted statewide

²¹ **Size and Arrangement.** The size and arrangement of the standard toilet stall shall comply with Fig. 30(a), Standard Stall. Standard toilet stalls with a minimum depth of 56 in (1420 mm) (see Fig. 30(a)) shall have wall-mounted water closets. If the depth of a standard toilet stall is increased at least 3 in (75 mm), then a floor-mounted water closet may be used. Arrangements shown for standard toilet stalls may be reversed to allow either a left- or right-hand approach. Additional stalls shall be provided in conformance with 4.22.4.

²² **Height.** The highest operable part of controls, dispensers, receptacles, and other operable equipment shall be placed within at least one of the reach ranges specified in 4.2.5 and 4.2.6. Electrical and communications system receptacles on walls shall be mounted no less than 15 in (380 mm) above the floor.

²³ **Grab Bars.** Grab bars for water closets not located in stalls shall comply with 4.26 and Fig. 29. The grab bar behind the water closet shall be 36 in (915 mm) minimum. Appendix Note

Reasonable Accommodation Training for Managers and Human Resource Professionals	Summer of 2008/Spring of 2009
Reasonable Accommodation Tracking Upgrade	June of 2008
Action Item	Projected Date of Completion
ADA Facilities Improvement Tracking	October of 2008
Online Public Right of Way and Curb Cut Accessibility Surveys	October of 2008
ADA Website	The prototype for this website will be developed by February of 2009
Accessibility Advisory Committee	Members will be selected, including two citizens with disabilities, by the end of May 2008 and the kickoff meeting will be held in July of 2008
Information Technology Accessibility Assessment	July of 2008
Facilities Compliance Plan Completion	Compliance checks will be completed by June of 2009/Dates identified for addressing identified deficiencies will be

Undue Hardship and Technical Feasibility
Policies

provided by September 2009

A draft of these policies will be completed
by November 2008