

**W** UNIVERSITY *of* WASHINGTON

ADA

# Transition Plan

*for the*  
UW Tacoma Campus

April 2021



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Additional copies of this document are available online at

**[www.washington.edu/compliance/ada/transition-plan/](http://www.washington.edu/compliance/ada/transition-plan/)**

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# WEBSITE RESOURCES

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**ADA Transition Plan project website:**

<https://www.washington.edu/compliance/ada/transition-plan/>

**PROWAG 2005**

<https://www.access-board.gov/guidelines-and-standards/streets-sidewalks/public-rights-of-way/background/revised-draft-guidelines>

**PROWAG 2011**

<https://www.access-board.gov/guidelines-and-standards/streets-sidewalks/public-rights-of-way/proposed-rights-of-way-guidelines>

**ADAS 2010**

[https://www.ada.gov/2010ADASTandards\\_index.htm](https://www.ada.gov/2010ADASTandards_index.htm)

A photograph of a concrete sign for the University of Washington Tacoma. The sign is a light-colored concrete wall with the text "UNIVERSITY of WASHINGTON" on the top line and "TACOMA" on the bottom line in large, dark, serif capital letters. The word "of" is smaller and in a lowercase serif font. The sign is set against a background of a multi-story red brick building with arched windows and bare trees. A silver street lamp with two globe lights stands to the right of the sign. The foreground shows a garden bed with brown mulch and some green plants.

UNIVERSITY of WASHINGTON  
TACOMA

*UW Tacoma sign*

# EXECUTIVE SUMMARY

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This **AMERICANS WITH DISABILITIES ACT SELF-EVALUATION AND TRANSITION PLAN** is a means of showing continual progress towards providing equal access and removing barriers for all students, employees, and visitors at the University of Washington Tacoma campus. The University of Washington Tacoma (UW Tacoma) is an agency of the State of Washington.

Through this plan, the University set out to evaluate facilities and programs on the campus within the public rights-of-way, public outdoor spaces, and building entrances accessible to the public to determine barriers to access for individuals with disabilities. The plan describes the current state of the campus and will be used to guide future planning and implementation of necessary accessibility improvements.

Both the self-evaluation and the transition plan are required elements of the ADA's Title II, which requires that government agencies provide equal access to programs and services

they offer. While the ADA applies to all aspects of government services, this document focuses exclusively on UW policies and the public rights-of-way and outdoor public areas on campus which include sidewalks, curb ramps, and building entrances accessible to the public.

This document summarizes the self-evaluation, which includes an accessibility assessment of pedestrian facilities as well as practices and procedures which relate to them. It also contains a transition plan, which identifies a strategy for the removal of barriers and identifies how the University will address requests for accommodations.

The University's goal is to establish a plan to remove current structural barriers associated with the assessed outdoor features, and to re-establish a comprehensive built environment plan to monitor and manage ongoing or future reported barriers to access.



*UW Tacoma urban campus*

# 1 INTRODUCTION

The **AMERICANS WITH DISABILITIES ACT (ADA)** was enacted on July 26, 1990 and provides comprehensive civil rights protections to persons with disabilities in the areas of employment, state and local government services, and access to public accommodations, transportation, and telecommunications.

## 1.1 PLAN REQUIREMENTS

Public universities and colleges, as well as other state and local government agencies, are required to create an ADA self-evaluation and transition plan when they grow beyond a threshold of 50 employees. Accessibility requirements extend to all public facilities. This plan is focused solely on access within the University-owned public rights-of-way, public outdoor areas and building entrances on the University of Washington Tacoma campus.

There are five titles or parts to the ADA; Title II is pertinent to travel within the public rights-of-way and government buildings. It requires public entities to make their existing “programs” accessible “except where to do so would result in a fundamental alteration in the nature of the program or an undue financial and administrative burden.” Public rights-of-way, public government buildings, and building entrances fall within University programs.

This effort was initiated by the University of Washington to satisfy the requirements of ADA Title II, 28 CFR Part 35, Subpart D – Program Accessibility § 35.150 (d)(3) which states:

*The plan shall, at a minimum—*

- (i) Identify physical obstacles in the public entity's facilities that limit the accessibility of its programs or activities to individuals with disabilities;*
- (ii) Describe in detail the methods that will be used to make the facilities accessible;*
- (iii) Specify 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 year, identify steps that will be taken during each year; and*

*(iv) Indicate the official responsible for implementation of the plan.*

To determine the physical obstacles in a public entity's facility, the proper standards and guidance must be identified for each feature type. The US Access Board's 2005 Revised Draft Guidelines for Accessible Public Rights-of-Way and 2011 Proposed Guidelines for Pedestrian Facilities in the Public Right-of-Way, or PROWAG, while not yet adopted by the US Department of Justice (DOJ), are currently used as the basis for public rights-of-way standards. The 2005 guidelines have been deemed a best practice by the Federal Highway Administration (FHWA) for features within the public rights-of-way and the 2011 guidance is also followed since it contains more restrictive standards for certain elements. When PROWAG is eventually adopted by the DOJ, it will become an amended section to the 2010 Standards for Accessible Design (ADAS), the document in which all federal ADA standards are collected. The public rights-of-way facilities covered under this plan were evaluated against PROWAG.

Building entrances accessible to students and the public were assessed against the 2010 ADAS and the regulations under Title II CFR Part 35. The 2010 ADAS replaced the 1991 ADA (ADA Accessibility Guidelines (ADAAG)). Additional building, state, and local codes may apply to these facilities and should be employed as appropriate when implementing barrier removal.

## 1.2 PLAN STRUCTURE

The structure of this plan was organized to align with federal ADA transition plan requirements. The plan includes:

### **CHAPTER 1 – INTRODUCTION**

### **CHAPTER 2 – SELF-EVALUATION:**

Documents self-evaluation findings including physical barriers.

### **CHAPTER 3 – STAKEHOLDER ENGAGEMENT:**

Documents public engagement efforts.

**CHAPTER 4 – BARRIER REMOVAL:** Identifies detailed recommendations the University should implement to remove barriers to access.

**CHAPTER 5 – PRIORITIZATION:** Outlines the prioritization process for barrier removal.

**CHAPTER 6 - IMPLEMENTATION:** Provides planning level cost estimates and potential funding sources. Describes both programs and mechanisms the University should use in order to remove barriers to access.

**CHAPTER 7 - CURRENT PRACTICES:** Provides the University with a location to document important and evolving plan information, such as where and how this plan should be accessible, annual performance tracking, identification of the responsible official and other items that will change over time.

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

# 2 SELF- EVALUATION

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**THE UNIVERSITY OF WASHINGTON** strives to ensure that people with disabilities are included and have access to its programs, services and activities. This work aligns with the University's vision to educate a diverse student body and its values of integrity, diversity, excellence, collaboration, innovation and respect.

Title II of the Americans with Disabilities Act (ADA) requires that jurisdictions evaluate services, programs, policies, and practices to determine whether they are in compliance with the nondiscrimination requirements of the ADA.

This section describes the data collection process used for the self-evaluation and resulting inventory of University facilities, such as sidewalks and curb ramps within the public rights-of-way, public outdoor spaces, and building entrances accessible to students and the public. To inventory the facilities in both a cost-effective and accurate way, Transpo Group, Endelman & Associates (E&A), and University staff worked in coordination throughout the inventory and self-evaluation process. Those processes are described in the following sections, along with a review of the University's ADA-related policies and procedures.

## 2.1 UW POLICY

The University of Washington maintains a group of policies and related procedures that establish its commitment to providing access and reasonable accommodation in its services, programs, activities, education, and employment for individuals with disabilities.

### 2.1.1 METHOD

For the purposes of the plan, only policies related to discrimination against people with disabilities as it relates to physical features within the campus were inventoried and described here.

## 2.1.2 FINDINGS

Executive Order No. 31 Nondiscrimination and Affirmative Action is a policy intended to promote an environment free from discrimination, harassment, and retaliation, and establish a means for seeking corrective measures when prohibited conduct has occurred. The policy prohibits discrimination or harassment against a member of the campus community on the basis of disability, among other protected classes.

Such discrimination against members of the public is also prohibited. Anyone who reports concerns regarding discrimination or cooperates with investigations of discrimination is protected against retaliation under this policy. The policy outlines how to file a complaint of discrimination, harassment, or retaliation as well as the resources available to students and employees. The policy tracks applicable federal and state laws and regulations including the ADA.

Administrative Policy Statement 46.3 Resolution of Complaints Against University Employees is the formal grievance policy and procedures that establish the methods for bringing a complaint against University employees. This policy details who investigates complaints, typical timelines for processing complaints, and responsibilities of University employees. All University employees must “report to their supervisors or the administrative heads of their organizations any complaints of discrimination”. The policy recommends that employees inform their supervisors or administrative heads, and their human resources consultant, of inappropriate, discriminatory, or retaliatory workplace behavior they observe. This policy also refers people to the ADA/Section 504 Coordinator for compliance questions. (<https://www.washington.edu/compliance/ada/>)

The Office of the ADA Coordinator provides assistance and consultation to the University community while also providing leadership, coordination and oversight to advance the University's ADA/Section 504 mission, vision and strategic priorities relating to accessibility.

Student Governance and Policies, Chapter 208, Reasonable Accommodation of Students with Disabilities, and Administrative Policy Statement 46.5, Policy on Reasonable Accommodation of Employees With Disabilities, are the policies used to support specific program access needs for individual students and employees that arise in work and academic environments. Program assessments and the interactive process are commenced through these policies to determine reasonable accommodations for individuals with disabilities.

Along with these policies, the University welcomes members of the campus community to report accessibility barriers in both physical and technological environments. On the University's Facilities website a link is provided to a web form to notify the University of physical barriers to access on the Tacoma campus. (<https://facilities.uw.edu/form/ada-barrier>)

For the Tacoma campus, information is provided to students, employees, and visitors about navigating and accessing campus. Information includes accessible routes, ADA parking, select building information, and how to report a barrier. The campus is supported by UW Facilities staff for major project delivery, construction oversight, and ADA guidance.

## 2.2 PHYSICAL BARRIERS

### 2.2.1 DATA COLLECTION

The data collection process was divided into two area types across campus. Walkways within the public rights-of-way and pathways within outdoor areas, outside of the rights-of-way, were measured by Transpo Group. Attributes of building entrances that are accessible to the public and students were collected by Endelman & Associates.

The self-evaluation process included a comprehensive field data collection effort that covered a number of attributes (slope, width, etc.) for various pedestrian features (sidewalks, curb ramps, crosswalks, etc.). The following list provides the number of attributes per pedestrian feature measured. In addition to the features listed below, Transpo Group also inventoried all outdoor wayfinding signage relating to accessible routes/facilities, and Endelman & Associates collected information on building entrances.

- ▶ Sidewalks – 12 attributes
- ▶ Curb Ramps – 25 attributes
- ▶ Traffic Signal Pushbuttons – 19 attributes
- ▶ Crosswalks – 5 attributes
- ▶ Bus Stops – 8 attributes
- ▶ Accessible Parking Aisles and Stalls – 18 attributes
- ▶ Barriers/Hazards – 11 attributes
- ▶ Stairways – 23 attributes
- ▶ Ramps – 25 attributes

Information on exterior pedestrian facilities was collected on the Tacoma campus between January and February 2020. Endelman & Associates completed the self-evaluation of

building entrances accessible to the public and students between November and December 2020. Doorway attributes were collected for 21 facilities across campus. Figure 2-1 shows the boundary extents of the data collection. The following sections describe the methodology for collecting data for the self-evaluation.

#### 2.2.1.1 Field Training

Transpo Group trained data technicians to conduct inventory collection using mobile tablet units with GIS geodatabase information. A data collection field guide was used to provide clear instruction on data collection methods and common situations that occur while in the field.

Field technicians then conducted field and data collection under supervision to ensure consistent and accurate measurement of pedestrian pathway features as well as accurate recording of information using a GIS database.

#### 2.2.1.2 Process

For sidewalks, the cross slopes and running slopes were measured at the beginning, middle, and end of the segment. These measurements were completed at locations outside of curb ramps and driveways, with the steepest measurement being the entry recorded. Campus pathways were broken into segments that started and ended at points of intersection. The predominant sidewalk width was recorded for each segment. In addition, a separate database was developed to inventory pedestrian access route barriers, including:

- ▶ Horizontal and Vertical Discontinuities
- ▶ Fixed, Movable, or Protruding Objects
- ▶ Non-Compliant Driveways

For curb ramps, both existing and missing curb ramps were identified. When measures of the same attribute differed, such as flare slope

Figure 2-1 Data Collection Boundary



(typically each ramp has two flares), the most significant barrier to access was recorded.

To improve the efficiency of the collection process for curb ramps, an optimization method was developed. The elements of curb ramps that often create the largest barriers when out of compliance were measured first. If any of these measurements were non-compliant, the data collector stopped taking measurements of other elements on the curb ramp. This method allows the University to quickly identify which ramps create more significant barriers to users and would need to be replaced without collecting unnecessary data. Some of the features not collected for curb ramps that failed the optimization process include flare slope, turning space attributes, and counter slope.

Data collection was completed for the pedestrian network within the Tacoma campus for pathways owned by the University and those owned by City of Tacoma.

Transpo Group’s physical inventory of features on University-owned property included:

- ▶ approximately 3.2 miles of existing sidewalks, paved shoulder walkways, paved separated walkways
- ▶ 22 curb ramps (additional 7 missing curb ramps)
- ▶ 4 crosswalks
- ▶ 26 accessible parking stalls and aisles
- ▶ 104 staircases
- ▶ 55 wheelchair ramps
- ▶ over 200 hazards

The self-evaluation findings only cover pedestrian features owned by the University. Additional collection of non-campus property was completed to help inform the overall

campus network analysis. Pedestrians often use non-campus facilities to access campus areas.

The list of attributes to be measured for each feature type found in the public rights-of-way was developed using WSDOT’s Field Guide for Accessible Public Rights of Way along with the United States Access Board’s 2005 and 2011 PROWAG as a baseline. The 2010 ADAS were used for features found outside of the rights-of-way. Refinement of attributes collected was based on feedback from University staff.

Endelman & Associates’ barrier assessment for ADA compliance included 93 publicly accessed exterior doorways. For each barrier found, a description was provided and an initial solution to remove the barrier was recommended. Additional site-specific review will need to be completed before implementing any barrier removal. Endelman assessed the individual barriers to access as well as the total percentage of accessible entrances provided to the public.

### 2.2.1.3 Quality Control

Pre-planning for the physical field inventory effort included a systematic quality control review of the raw field data. The quality control review process was completed at regular intervals via an online mapping viewer which allowed reviewers to check the data electronically as it was being collected in the field. Data discrepancies or errors, including missing data, were identified and coordinated with consultant team staff to re-inventory problem areas. As with all manual field data collection efforts, a few small errors occurred during data collection. Additional data collection efforts to replace questionable or missing data were conducted and addressed.

**CURB RAMPS**



**CROSSWALKS**



**HAZARDS**



**ACCESSIBLE PARKING**



**FURNITURE**



**SIDEWALKS**



## 2.2.2 FINDINGS

The following sections detail the primary barriers inventoried and analyzed for ADA compliance. The barriers found applied to curb ramps, sidewalks, discontinuities and obstacles in pedestrian routes, staircases, wheelchair ramps, and building entrances. The resulting barriers found tend to arise from deferred maintenance, ground settling since initial construction, and updates to ADA standards since the date of construction. When scopes are developed for barrier removal projects, barriers determined not to be feasible for removal will be documented. It may be determined that some barriers identified through this transition plan are on facilities that have been built to the maximum extent feasible as discussed in Section 4.1. Each project to remove barriers should be evaluated to determine if improvements to the facility are feasible in the engineering design phase. Multiple paths that serve the same program on campus may be identified. One or more of these paths may be identified as accessible and barriers on non-accessible paths path serving the same location may not be removed.

Depending on when new construction or alterations of ADA features commence, different ADA standards apply. Table 2-1 lists the standards that apply to the three time

periods for alterations and new construction. After March 15, 2012, any alterations or new construction must comply with the 2010 Standards. Pedestrian features must fully comply with the applicable standards, unless it is found that there are structural impracticalities in meeting the requirements. An alteration, as defined by ADAS 2010, is considered “a change to a building or facility that affects or could affect the usability of the building or facility or portion thereof. Alterations include, but are not limited to, remodeling, renovation, rehabilitation, reconstruction, historic restoration, resurfacing of circulation paths or vehicular ways, changes or rearrangement of the structural parts or elements, and changes or rearrangement in the plan configuration of walls and full-height partitions. Normal maintenance, reroofing, painting or wallpapering, or changes to mechanical and electrical systems are not alterations unless they affect the usability of the building or facility”.

For the purposes of this transition plan, compliance was compared against the 2010 standards for on-site features and PROWAG for features within the rights-of-way. Other standards such as local, state, or building code may apply to the inventoried features but were not evaluated for compliance against these standards.

Table 2-1 ADA Standards and Compliance Dates

Compliance Date for New Construction or Alterations	Applicable Standards
Before September 15, 2010	1991 Standards or UFAS
On or after September 15, 2010 and before March 15, 2012	1991 Standards, UFAS, or 2010 Standards
On or after March 15, 2012	2010 Standards

### 2.2.2.1 Curb Ramps

Figures 2-2 and 2-3 show the major components of a typical perpendicular and parallel curb ramp, respectively. Ninety percent of the curb ramp locations identified are either non-compliant or missing. The data surveyed for verifying curb ramp compliance was divided into two overarching categories: non-compliant and minor non-compliant. The findings demonstrated that most of the curb ramps on campus fall into the non-compliant category. Non-compliant curb ramps are existing/missing curb ramps given an accessibility score of 30. Minor non-compliant curb ramps received an accessibility score of 1-29. For further detailing on scoring, see Section 5.2.1.

Non-compliance is primarily attributable to the following core criteria:

- ▶ The ramp width is too narrow. One curb ramp width was less than 36 inches, three curb ramp widths were between 36 inches and 48 inches.
- ▶ The ramp running slope is too steep. Eight curb ramps were found to have a running slope greater than 8.3%.

- ▶ Ramp cross slope is too steep. One curb ramp has a cross slope greater than 2%.
- ▶ Curb ramp is missing. Seven locations were found to have no curb ramps.

For some of the high scoring curb ramps, the non-compliance is caused by the necessity to tie into the existing terrain around the curb ramp. Due to elevation changes across campus, meeting compliant grades becomes a challenge. In curb ramp design, a key goal is to limit the ramp slopes, but steep roadway grades can prevent this from being practical in many instances. Maximum extent feasible (MEF) documentation may be necessary in certain cases where it is found to be infeasible to remove all of a curb ramp's barriers. Where some barriers can still be reduced or removed, the improvement will need to be completed along with the MEF documentation. At locations where curb ramps are missing, different solutions could be applied such as installing a new curb ramp, adding signage to prevent crossings, or raising the crossing to the elevation of the curb.

Figure 2-2 Perpendicular Curb Ramp Attributes

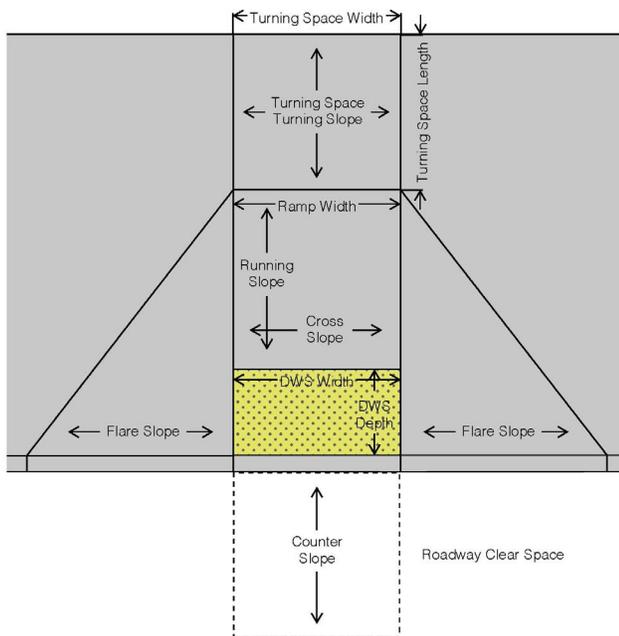
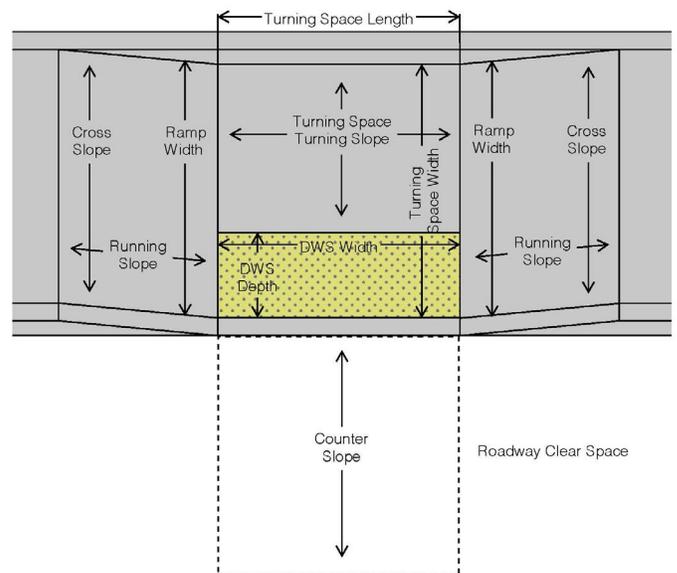


Figure 2-3 Parallel Curb Ramp Attributes



### 2.2.2.2 Sidewalks

Several miles of sidewalks and pathways on campus are non-compliant with varying levels of access along the segments. Common attributes for sidewalks and driveways are shown in Figure 2-4. Sidewalk segments that earned an accessibility score of 16-30 were categorized as non-compliant. Sidewalks that received an accessibility score of 1-15 were considered minor non-compliant. See Section 5.2.1 for details on accessibility scores. The most common hazards along the pathways were gaps between concrete panels, uplifted sidewalks panels, and utility boxes without non-slip coatings. Gaps between panels often come from concrete shrinkage and wear on gap sealant.

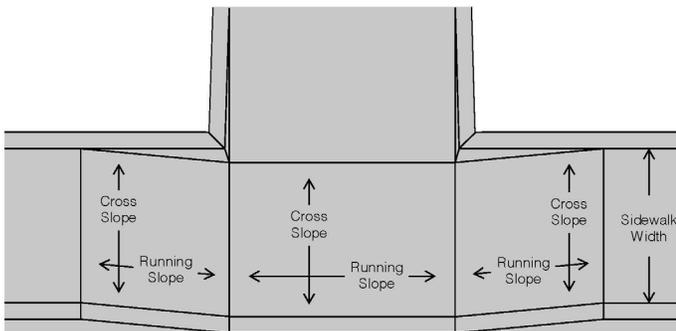
Non-compliance is primarily attributable to:

- ▶ The sidewalk width is too narrow. 150 feet of on-site pathways have a width less than 36 inches. 0.6 miles of pathways within the rights-of-way have widths less than 60 inches and have no pullouts. Some of these pathways have

alternate routes and can be noted as such during the barrier removal process.

- ▶ The cross slope of the sidewalk is too steep. Around 60% of sidewalk segments were found to have at least one location where the cross slope was greater than 2%.
- ▶ The running slope of the sidewalk is too steep. Around 30% of sidewalk segments have a non-compliant running slope in at least one location along the segment. Where sidewalks were adjacent to roadways the running slope was compared to the roadway grade when the sidewalk running slope was greater than 5%. If the running slope and roadway grade matched, then the running slope was considered compliant.
- ▶ The sidewalk has fixed/non-fixed barriers and other discontinuities that impede required usable pedestrian space. Vertical and horizontal discontinuities were regularly found across campus. Other less common obstacles such as untrimmed trees and bushes and parked cars were also found.

Figure 2-4 Driveway and Sidewalk Attributes



Pedestrian pathway adjacent to roadway

- ▶ Non-compliant driveways intersect the sidewalk. Five driveways were identified as non-compliant. All of these driveways have issues related to the cross slopes exceeding the acceptable 2% threshold.

### 2.2.2.3 Other Outdoor Pedestrian Features

Other measured features included accessible parking stalls and aisles, crosswalks, staircases, and wheelchair ramps.

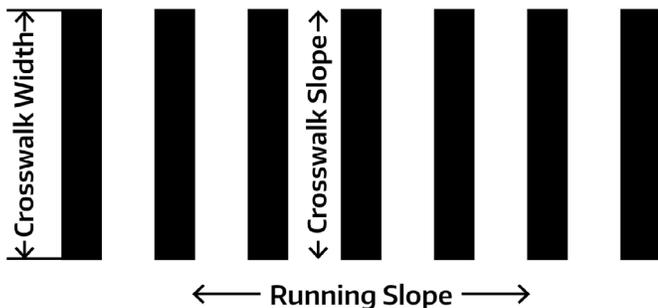
#### Accessible Parking

Parking stalls designated as accessible stalls on-street, in surface lots, and parking garages were inventoried, totaling 26 parking stalls. Dimensions, slopes, signage, and vertical clearances were surveyed for accessible parking stalls and associated access aisles. The following characteristics were found for the accessible parking stalls on campus.

There are 18 parking stalls and access aisles that have non-compliant cross slopes; approximately 90% of the accessible stalls have a sign that designates them as accessible with around 40% of those signs mounted at a compliant height, at least 60 inches.

There are nine accessible parking stalls that have signs designating them as van accessible, all of which are either located in a surface lot or on-street parking.

Figure 2-5 Crosswalk Attributes



Pedestrian pushbutton

Per the ADA, accessible parking stalls are not required to have the international symbol of accessibility marked directly on the pavement, although it is strongly recommended. State and local requirements may differ from the ADA standards.

#### Crosswalks

Both marked and unmarked crosswalks must comply with ADA standards. All intersection crosswalks are legal crosswalks unless signed to prohibit pedestrian crossings; four marked crosswalks and zero unmarked crosswalks were inventoried. All but one of the marked crosswalks identified complied with the standard width requirement and 75% of all the crosswalks have compliant running slopes. The most common non-compliant element of crosswalks was the cross slope with 50% of crosswalks having non-compliant cross slopes. Per PROWAG, crosswalks at mid-block crossings can have cross slopes that match the grade of the road they are crossing, while crosswalks with stop or yield control are required to have a cross slope less than or equal to 2%. At intersections without stop or yield control, acceptable cross slope can be a maximum of 5%. The number of compliant crosswalk cross slopes takes into account these location subtleties. Figure 2-5 shows the major attributes measured for crosswalks.

## Wheelchair Ramps

Wheelchair ramps are often used pathways to help traverse significant elevation changes and implemented instead of staircases or in addition to them. There are 55 wheelchair ramps located on the exterior pedestrian network of the Tacoma campus; 50% of the ramps, 51% of the top landings, and 62% bottom landings have cross slopes greater than the 2% compliance threshold. Approximately one fifth of the ramps require additional landings due to their rise being greater than 30 inches; 19 ramps are either missing handrails or only have handrails on one side of the ramp.

## Staircases

Exterior staircases that provided connectivity to the outdoor pedestrian network were measured. For these staircases, the dimensions and slopes of the individual stair steps were measured, and attributes of any associated handrails were recorded. Within the stair steps, the most frequent non-compliant feature is the nosing radius with 28 staircases that have nosing radii greater than 0.5 in. A closer look

at these staircases is necessary to determine the extent of the nosing radius issue.

For staircase handrails, the common features with compliance issues are the handrail extensions and height. Many extensions have non-compliant slopes and/or have a non-compliant length; ten handrails have a height outside of the 34 - 38 inch range. Only staircases on paths of egress that are University-owned are included as part of this plan and required to be ADA 2010 compliant. These staircases will need to be identified by the University.

## Building Entrances

Common barriers found across campus entrances include:

- ▶ Accessible entrances lack signage displaying International Symbol of Accessibility or the pictogram is not 6" high minimum.
- ▶ Accessible entrances lack level accessible route or compliant access ramp.
- ▶ Accessible entrances lack maneuvering space or compliant maneuvering space at entry.
- ▶ Amount of accessible entrances provided per building does not meet required percentage.



*Staircase at UW Tacoma*



*Aerial view of UW Tacoma*

# 3 STAKEHOLDER ENGAGEMENT

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ADA regulations require public entities to provide opportunities for comment to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, so that they may participate in development of the plan and processes. (28 CFR 35.105(b) and 28 CFR 35.150(d)(1)).

The University had three primary goals for the public outreach activities prior to adopting the plan:

- ▶ Inform the public about the University's plan and processes for barrier removal. Provide information to assist interested parties in understanding issues faced by the University, alternatives considered, and planned actions.
- ▶ Solicit public comment to identify errors or gaps in the proposed campus transition plan, specifically on prioritization and grievance processes.
- ▶ Meet Title II requirements for public comment.

## 3.1 ENGAGEMENT METHODS

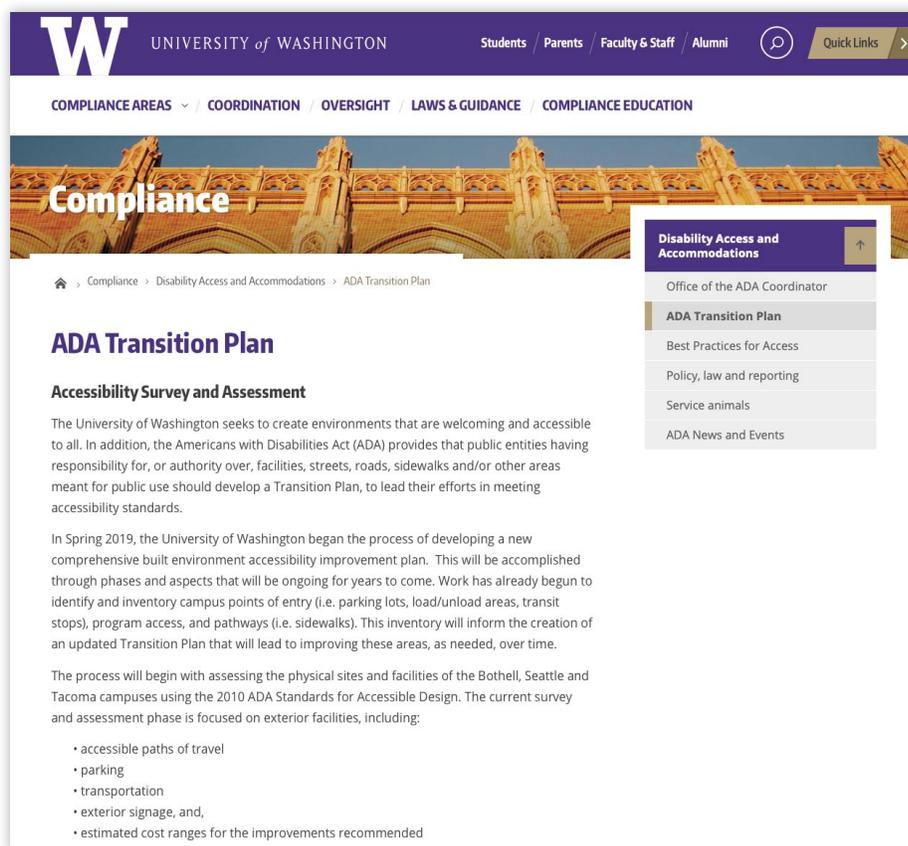
In order to collect a diverse set of responses, a campus listening session and survey were conducted. Notice of the listening session and survey was managed by Compliance and Risk Services. Posters were placed across campus and in nearby commercial restaurants and coffee shops. The purpose of these exercises was to identify key themes to be used in development of the plan.



included questions that allowed respondents to rate the accessibility of facilities on campus and select their priority level related to addressing access issues for certain types of facilities. Within the open-ended comments section of the survey, many responses fell into four main categories: buildings, pathways, transit and parking. Buildings/signage, sidewalks, stairs and pathways, and parking were rated most poor and below average as they relate to campus access. Transit was rated as a low or medium priority for the campus.

### 3.1.3 PROJECT WEBSITE

The University is promoting the ADA Transition Plan project on its website: <https://www.washington.edu/compliance/ada/transition-plan/>. The site provides easy access to project information and avenues to provide feedback throughout the self-assessment and transition plan development and implementation.



ADA transition planning project website:  
<https://www.washington.edu/compliance/ada/transition-plan/>



*UW Tacoma in springtime*

# 4 BARRIER REMOVAL RECOMMEN- DATIONS



## 4.1 APPROACH

The following recommendations were developed in response to the completed assessment and have been drafted to recommend clearly-identified actions so that progress on each recommendation can be easily tracked and updated. Two of these recommendations have already been implemented by the University in compliance with the requirements of a transition plan.

### 4.1.1 RECOMMENDATION 1

#### Update Campus Accessible Wayfinding

Data collection of existing campus signage related to wayfinding and accessibility was completed. As part of the data collection process, existing signage was documented and photos were taken of each sign inventoried. A plan to improve wayfinding as it relates to accessibility should be developed using this data. The plan should include recommendation for signage changes to provide more awareness to students, employees, and visitors of accessible features on campus. Key locations such as accessible parking and entrances should be signed to provide clear instructions for those individuals traveling on campus and updates to the University's online campus map can be made to enhance the level of detail provided. The Endelman and Associates self-evaluation also identified accessible doorways that provide no signage or non-compliant signage. The University should incorporate these recommendations as it makes campus improvements.



Not Started



Underway



On-going



Complete

## 4.1.2 RECOMMENDATION 2

### Identify a University official responsible for Transition Plan implementation

The Chancellor has been identified as the primary official with ultimate responsibility for implementing this transition plan, along with University architects and others as designated. The University has also identified its ADA/Section 504 Coordinator, a program of the UW Compliance and Risk Services, as the individual responsible for coordinating the University's ADA compliance (see Section 7.1 for more information). This position, often referred to as the "ADA Coordinator," is one of the four major federal requirements for every ADA transition plan.



*Sign directing pedestrians around a work zone*

## 4.1.3 RECOMMENDATION 3

### Educate University staff, consultants, and contractors on PROWAG and ADA standards

Transition plans are often a learning experience for the staff of a public entity, consultants, and contractors alike since they alter existing practices and expectations. The University should use the process of developing a transition plan to teach and learn about accessibility and the barriers individuals with limited mobility or sight experience when traveling on campus.

Education can take many forms, from review of updated design standards with key individuals such as field inspectors and contractors, to development and review of local and state specific design standards, or training from groups that serve people with disabilities.

## 4.1.4 RECOMMENDATION 4

### Clarify and enforce accessibility requirements for construction zones

Work zones should provide the same level of access as permanent pedestrian facilities covered by ADA requirements. Pedestrian access must be maintained in areas of street construction and maintenance. The University should review standards and policies to ensure that alternative walking routes are designated within work zones.



### 4.1.5 RECOMMENDATION 5

#### **Maintain barrier reporting process**

A request for barrier removal allows the public to seek accommodations or barrier removal. It is currently possible to make a request in-person, by telephone, by mail, or via e-mail. Those requests are recorded by the University. Additionally, the University now provides an online form allowing people to report a barrier to access in an even more convenient format. The UW Tacoma website should be updated to make this information easier to locate for visitors, faculty, and students. The information should be made accessible from convenient web pages on the University’s website such as from the facilities or visitor web pages.

As described in Section 2.1, the barrier to access reporting tool has been implemented on campus through UW Facilities.

### 4.1.6 RECOMMENDATION 6

#### **Develop a consistent and centralized MEF documentation database**

Maximum extent feasible (MEF) is a provision that requires alterations to facilities governed by ADA standards that could affect the usability of a facility must be made in an accessible manner to the maximum extent feasible. ADA Standards for Accessible Design 2010 dictates that:

Each facility or part of a facility altered by, on behalf of, or for the use of a public entity in a manner that affects or could affect the usability of the facility or part of the facility shall, to the maximum extent feasible, be altered in

such manner that the altered portion of the facility is readily accessible to and usable by individuals with disabilities, if the alteration was commenced after January 26, 1992.

The University should adopt an MEF documentation process and standard template for such documentation when addressing new or altered construction. This documentation should be stored in a centralized location and be linked to the campus’s geo-referenced GIS ADA self-evaluation database to ensure consistency of the data.

Consolidation of past MEF records into this geo-referenced database is also recommended to allow the University to identify those pedestrian facilities surveyed as part of the self-evaluation and subject to an MEF, which should therefore be removed from the list of campus barriers.

### 4.1.7 RECOMMENDATION 7

#### **Develop performance measures and processes to track barrier removal**

The primary purpose of an ADA transition plan is to develop a plan for removal of barriers to access. The University has initiated development of a process to track barrier removal on a year by year basis. To enhance this process, it is recommended the University actively update the GIS ADA self-evaluation database developed for this plan, tracking how and when ADA barriers are removed. This data can be used to provide annual updates on progress and to demonstrate the University’s progress regarding its Title II requirements.



Not Started



Underway



On-going



Complete

### 4.1.8 RECOMMENDATION 8

#### **Develop Guidelines for ADA Standards**

Guidelines for implementing ADA standards will be a useful tool for various University offices including Compliance and Risk Services and UW Facilities units, as well as contractors, designers, and maintenance staff. These guidelines can serve as a means for enforcing ADA standards and applying a consistent approach to implementing them.

The guidelines will provide references to key ADA standards and outline field surveying techniques for evaluating different types of pedestrian features.

### 4.1.9 RECOMMENDATION 9

#### **Evaluate all University Programs and Activities as they Relate to the ADA**

The focus of the initial self-evaluation and transition plan was on ADA barriers related to the public rights-of-way and exterior spaces on the Tacoma campus. The requirements for accessibility found in Title II of the ADA apply to many functions, programs, and activities the University may provide or engage in. In addition to the public rights-of-way and exterior spaces, self-evaluation and transition planning related to activities such as hiring, communications, recreational programs, physical facilities, etc. should be performed to identify barriers within these programs and activities.

### 4.1.10 RECOMMENDATION 10

#### **Coordinate with City of Tacoma and Adjacent Property Owners to identify Barrier Removal Projects**

The University should leverage the data collection completed for the pedestrian facilities owned by the City of Tacoma and adjacent property owners, but within the UW Tacoma Campus boundary, to help identify the most beneficial projects. The University, City of Tacoma, and adjacent property owners could join forces on these projects to improve campus access.

# 5 PRIORITI- ZATION

Barrier Removal Priority Scoring includes the following factors:



**EXISTING BARRIERS  
TO ACCESSIBILITY**



**PATHWAY HIERARCHY**

## 5.1 APPROACH

Following completion of the campus-wide barrier assessment, development of an implementation plan and transition schedule included two steps. First, all pedestrian facilities with an identified barrier were prioritized based on two factors: the severity of the barrier and the pathway hierarchy. Next, a planning level cost estimate (not project cost) was developed to provide an estimate of the financial resources needed to remove all barriers.

## 5.2 PRIORITIZATION

To focus efforts on the University's highest priority access routes and the barriers within them, an analysis of the accessibility of public outdoor areas was completed. This analysis resulted in a prioritized list of pedestrian facilities for barrier removal.

To complete this assessment, a multi-criteria analysis was conducted to determine which facilities do not meet existing standards. Each attribute collected in the field was compared against the relevant ADA and PROWAG requirements.

The following items were analyzed and combined to create a barrier removal priority scoring tool (Section 5.2.3).

1. **Existing barriers to accessibility** - described in Chapter 2 Self-Assessment and accessibility Section 5.2.1 scoring criteria.
2. **Pathway Hierarchy** - evaluation of routes and the pathway hierarchy (Section 5.2.2).

### **5.2.1 “BARRIERS TO ACCESSIBILITY” SCORE**

A number of criteria were used to identify high priority facilities on the UW Tacoma campus. The process was completed by identifying University and shared buildings, public pedestrian facilities on campus, and rating the accessibility of each facility. The criteria used for each facility type, the threshold used to identify barriers, and the score used to indicate the relative significance of each barrier was developed. Facilities with a higher “Barriers to Accessibility” Score represent a significant barrier to access.

### **5.2.2 PEDESTRIAN PATHWAY HIERARCHY SCORE**

In order to further prioritize removal of barriers in the campus circulation network, a pathway designation was given to each pathway within the outdoor pedestrian network. This metric was identified as the Pedestrian Pathway Hierarchy Score. To enhance and validate the pedestrian pathway hierarchy selection process, UW staff familiar with the Tacoma campus including the UW ADA Coordinator reviewed the hierarchy designations and provided feedback that was incorporated into the network scoring.

The pedestrian pathway hierarchy score represents the segment’s importance to network connectivity across campus with scores ranging from 1-4. Pathway hierarchy #1 are segments that many people will access as they travel, while hierarchy #4 shows segments less traveled off the arteries of the campus pedestrian network.

### **5.2.3 BARRIER REMOVAL PRIORITIES**

By combining the Accessibility Scores and the Pedestrian Pathway Hierarchy Score, an Accessibility & Location Combined Score was developed for each barrier. Together, along with the stakeholder engagement feedback (Chapter 3), this information was used to prioritize barrier removal at locations where pedestrians would be expected. Facilities with the highest score should be addressed first (46+ points) given that those present a clear physical barrier and are in high-demand areas. Facilities with minor barriers and lower scores (0 to 15 points) should be addressed last; these facilities are in locations where pedestrian demand is expected to be lower. The scores are relative, comparing one facility to the other. The ranges for medium and high priority were established based on review of the identified barriers and assessment of the relative significance of the barrier presented.

# 6 IMPLEMENTATION

Establishing priorities for removal of barriers to access on University of Washington-owned property is the primary purpose of this ADA Transition Plan.

The following section documents the primary methods of barrier removal and contains recommended revisions to University policies and practices to ensure compliance with state and federal requirements for ADA accessibility.

## 6.1 BARRIER REMOVAL METHODS

The University currently uses several methods, building renovations and maintenance, to remove barriers to access and has the potential to add more to increase the rate of barrier removal.

### 6.1.1 CURRENT FUNDING SOURCES

Table 6-1 outlines the current funding sources for removing barriers to access across the campus. The funding sources cover areas including general maintenance needs and larger scale projects. These types of projects remove barriers found in building facilities and on-site features.

### 6.1.2 CURRENT CAMPUS DEVELOPMENT

Campus development now underway will result in removal of barriers to access and continue to promote accessibility.

*Table 6-1 Current Campus Barrier Removal Sources*

Funding Source	Typical Barrier Removal Application
Building Account	Minor capital and systems renovations
State Appropriations	Major building renovations/construction
Local Funds	Program driven priorities

Upcoming project currently under design:

- ▶ **Milgard Hall:** located south of the Snoqualmie building; estimated construction anticipated in 2022-2023.

Pedestrian improvements (new or replacement) are often included as a component of campus construction projects. With this transition plan, barriers to access are now easier to identify and include in future projects.

## 6.2 TRANSITION PLAN COST AND SCHEDULE

One requirement of an ADA Transition Plan is development of a schedule demonstrating the expected timeframe for a public entity to remove accessibility barriers. Understanding the financial resources needed to remove them is essential for developing such a schedule.

### 6.2.1 PROCESS

Unit costs were developed to address ADA barriers described in Chapter 2. These costs were developed using recent bid tabulations (2016-2019) and assumptions regarding the typical unit cost of replacement for each ADA barrier. A draft unit cost estimate was created using information from the data inventory and calculated using current year construction costs. The estimates are meant to assist in determining a schedule for the completion of the barrier removal process. They also serve as a tool to help the University plan and fund full removal of barriers over a period of time.

### 6.2.2 COST ESTIMATE ASSUMPTIONS

Planning level unit cost estimates were determined using unit costs and data gathered during the inventory process. ADA deficiencies were totaled using their

respective unit of measurement: for example, square yards for sidewalks, and number of facilities for curb ramps.

Other factors such as contingency, design, mobilization, traffic control, and sales tax will be added once project scopes are defined. Additional costs to be added to the project level costs include those associated with items such as grading, permitting, contingency for changes in future accessibility standards, structural impacts, and inflation. The additional cost due to inflation will vary based on when a project is initiated.

Crosswalks were not included in this plan's costing efforts, as costs for improving crosswalks can be highly dependent on the type of ADA deficiency and the area surrounding the crosswalk. For example, if the crosswalk cross slope is non-compliant, the entire intersection and roadway leading up to the crossing may require regrading to adjust the slopes within the crosswalk itself. This regrading effort can encompass areas far outside of the original footprint intended for replacement.

It is also important to note that the physical feasibility of removing each ADA barrier was not considered in developing the planning level cost estimate. Due to existing roadway grades, geometry, building layouts and other physical factors, it is unlikely that a significant portion of the ADA barriers can be fully removed but may be improved to the maximum extent feasible.

Table 6-2 provides a summary of each activity associated with barrier removal and the applicable cost of removing the specified number of deficiencies. This table does not include additional costs that will be added as the barrier removal projects are refined; it only documents the per unit cost. Non-compliant sidewalks/walkways and wheelchair ramps represent the largest overall cost.

### 6.2.3 SCHEDULE

Identified barriers are anticipated to be remediated through currently funded capital building projects, maintenance work, partner-funded projects, and by securing funding over the next several biennium. (See Section 6.1 for current and anticipated projects.)

The University's next step is to create barrier removal projects and project costs which will inform a removal schedule. Progress on the schedule and alignment with established priorities will be reevaluated annually to ensure projects, maintenance, and budgets support selected goals.

Due to significant investment of time and money needed to remove accessibility barriers, it is important to identify the highest priority barriers to accessibility and focus resources on removing them first. An analysis of barrier removal priorities was completed to determine how many barriers within the inventoried areas are classified as 'very high' and 'high' priority as defined in Section 5.2.

Highest priority barriers represent a significant barrier to access in areas with high demand for accessibility. The majority of barriers in the high and very high priority categories are sidewalks, curb ramps, and doors. Lower priority barriers represent lesser barriers to access in areas with lower pedestrian demand. By removing the highest priority barriers first, the University is working to provide the best access to the most critical programs, in the shortest time period possible.

Through the development of this plan and analysis of accumulated data, an online mapping tool was created to provide geospatial information, accessibility attributes, and prioritization of barriers within one platform. The online mapping tool will be a key instrument to identify barrier removal projects. Due to the

campus density, the online platform allows a user to look at the campus as a whole and explore areas in greater detail. Since the online mapping tool provides a structure that houses the transition plan's self-evaluation and analysis, it should be used in project scoping.

With use of the online mapping tool and priority level assignments the University will select projects to continue barrier removal. To inform project selection, a scoping effort should take place. This effort would include site visits for areas identified as high priority, to determine the severity of the barrier and evaluate possible solutions to address the issue. When selecting projects, site conditions and improvement feasibility should be considered. Areas with multiple barriers within close proximity can be grouped together to achieve cost savings.

Some barriers identified through this transition plan are on facilities that have been built to the maximum extent feasible as discussed in Section 4.1. Each barrier removal project should be evaluated in the engineering design phase to determine if improvements to the facility are feasible.

Table 6-2 Cost Estimate

Facility Type	Improvement Types	Quantity	2019 Replacement Costs
<b>SIDEWALKS</b>			
Sidewalk	Reconstruct existing sidewalk or paved shoulder walkway	7,139 SY	\$1,036,300
Driveway	New driveway with sidewalk	5	\$14,500
<b>MAINTENANCE/MISCELLANEOUS</b>			
Vertical Discontinuity	Sidewalk grinding (10 LF of sidewalk)	12	\$3,000
Horizontal Discontinuity	Sidewalk crack sealing/grouting	910 LF	\$4,600
Fixed Obstacles	Relocation of obstacles including utility pole, mailbox, tree trunk, etc.	1	\$3,000
Movable Obstacles	Relocation of obstacles including tree/bush (pruneable), message boards, parked cars, etc.	1	\$200
Protruding Obstacles	Relocation of obstacles including of tree/bush, signs, awnings etc.	11	\$5,500
<b>CURB RAMPS</b>			
Missing Curb Ramp	New curb ramp	7	\$32,200
Detectable Warning Surface (DWS)	New bolt down detectable warning surface	3	\$1,800
Existing Curb Ramp (running slope, cross slope, ramp width, etc.)	Reconstruct existing ramp	14	\$70,000
Curb Ramp Landing	Install or replace landing	3	\$3,000
Crosswalk	Rechannelize crosswalk	1	\$1,100

NOTES:

Costs listed for each feature type includes cost of barrier removal for barriers that may remain in place due to the feature being installed to the maximum extent feasible (MEF). Further study of these features is necessary on a case by case basis.

Project plan costs will be developed to include additional costs beyond the base unit costs for barrier removal improvements. Work such as design, mobilization, TESC, & traffic control, construction management, and sales tax will be added to the project cost. Additional cost related to storm design, structural features, and landscaping will be included as the project costs are refined. A schedule for construction will also be created with inflation applied to the overall project cost.

Table 6-2 Cost Estimate

Facility Type	Improvement Types	Quantity	2019 Replacement Costs
<b>STAIRCASES</b>			
Staircase (riser, tread, slope, etc.)	Replace concrete staircase (per 1 ft width)	2,657 LF	\$265,700
Handrail (height, diameter, extensions, etc.)	Install or replace handrail	429 LF	\$64,400
Contrasting strip	Replace contrasting strip	407 LF	\$6,200
<b>RAMPS</b>			
Ramp (width, slope, landing, etc.)	Replace ramp	1,090 SY	\$207,100
Handrail (height, diameter, extensions, etc.)	Replace handrail	3,000 LF	\$450,000
<b>ACCESSIBLE PARKING</b>			
Parking stall/parking aisle slope.	Grind surface and/or add asphalt lift	36	\$72,000
Accessible parking stall/parking aisle width or pavement marking.	Install parking stall accessible symbol/aisle pavement markings or resize and restripe stall/aisle	7	\$1,400
Sign height or no sign indicating accessible stall.	Install new sign or adjust existing sign	17	\$1,700
<b>BUILDING ENTRANCES</b>			
Building Entrance or Number of Accessible Entrances	Upgrade existing building entrance or upgrade other building entrances		\$95,898

NOTES:

Costs listed for each feature type includes cost of barrier removal for barriers that may remain in place due to the feature being installed to the maximum extent feasible (MEF). Further study of these features is necessary on a case by case basis.

Project plan costs will be developed to include additional costs beyond the base unit costs for barrier removal improvements. Work such as design, mobilization, TESC, & traffic control, construction management, and sales tax will be added to the project cost. Additional cost related to storm design, structural features, and landscaping will be included as the project costs are refined. A schedule for construction will also be created with inflation applied to the overall project cost.



*Parking lot at UW Tacoma*

# 7 CURRENT PRACTICES

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This section documents key pieces of information critical to ongoing plan implementation. This information will be updated as described in Section 7.5.

## 7.1 OFFICIALS RESPONSIBLE

*For Implementation:*

**Mark A. Pagano, Chancellor**

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*For ADA Coordination:*

**Bree Callahan, ADA/Section 504 Coordinator**

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## 7.2 MAXIMUM EXTENT FEASIBLE DATABASE AND PROCESS

Once an official system is approved, the process will be documented in summary memoranda.

## **7.3 CURRENT GRIEVANCE PROCESS**

See Section 2.1.2 for the University's current ADA Grievance Policy. Changes to policies will be outlined in the summary memoranda.

## **7.4 ACCESSIBILITY OF ADA TRANSITION PLAN INFORMATION**

Find the accessible electronic version of this ADA Transition plan at: [uw.edu/ada](http://uw.edu/ada)

## **7.5 BARRIER REMOVAL PERFORMANCE MONITORING**

The plan is currently less than one year old and represents the most recent available data. The University will track barrier removal progress and provide summary memoranda on a yearly basis for the first three years following plan implementation. After this three year period, progress memoranda will be prepared on a biennial basis.



*UW Tacoma campus*



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