

2 Self-Assessment

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

This section describes the data collection process and resulting inventory of physical facilities such as sidewalks and curb ramps within the County's public rights-of-way. The inventory and self-assessment process are described in these sections.

2.1 Policy, Practices and Design Standards

Practices and design standards that meet accessibility standards are essential to ensure new or upgraded pedestrian facilities are accessible and that these upgrades contribute to the removal of accessibility barriers throughout the County. This section summarizes a review of County's practices and design standards for barriers and includes major findings of this work. Complete documentation of this work can be found in Appendix A. The audit was conducted in February of 2020.

2.1.1 Method

Whatcom County maintains adopted design standards for pedestrian facilities. These standards are used for County funded projects as well as privately designed and constructed projects within the public right-of-way. The Whatcom County Street Design Standards were audited for compliance with ADA guidelines found in the 2010 ADAS and the Public Rights-of-Way Accessibility Guidelines (US Access Board, 2005).

2.1.2 Findings

As a result of the standards review several recommendations were made to update these guidance documents to adhere to ADA standards. The code mostly references the RCWs regarding ADA standards, which is appropriate to clarify legal requirements. For many items' additional references to the WSDOT Design Manual will provide the necessary detail to make sure the county standards are compliant with ADA standards. Additionally, there were a few discrepancies between the Whatcom County Code, Road Standards and Standard Drawings. These recommendations are grouped into several categories including: Sidewalks, Crosswalks, Curb Ramps, and Signals, these can be found in Appendix A.

2.2 Physical Barrier

2.2.1 Data Collection

A self-assessment of all facilities within the public right-of-way was conducted and employed a robust data collection effort that included 8 attributes for sidewalks, 22 attributes for curb ramps, 17 attributes for signal pushbuttons, 4 for crosswalks, 7 attributes for bus stops, 14 for ADA accessible parking aisles and stalls, and 10 attributes for barriers/hazards. These attributes were collected in the field with individuals trained in ADA data collection methods. Data was collected over a four-month period.

A qualitative assessment was also conducted for the accessibility of the Whatcom Chief Ferry from Gooseberry Point to Lummi Island. This assessment occurred in October of 2020 and included a site visit and interviews with Ferry operators and County staff.

2.2.1.1 Process

Data inventory for public ROW features was collected using mobile tablet units and other smart devices with GIS geodatabase information. Attributes for features in the public ROW were collected by a consultant from July to September 2019.

Consultant staff conducted field and data collection under supervision to ensure consistent and accurate measurement of sidewalk and curb ramp measurements as well as correct recording of information using a GIS database.

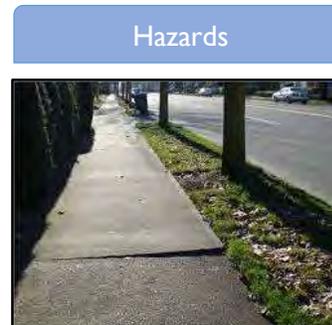
Data collection staff were provided a tape measure (to measure dimensions for features such as widths of curb ramps and sidewalks), and a smart level to efficiently and accurately measure slopes. Data collectors used mobile units with the Collector for ArcGIS application installed to record the measurements and traits of each feature.

For sidewalks, cross slopes were measured at each end of the segment and once in the middle. The running slope was measured at similar locations excluding within curb ramps and driveways, with the steepest measurement being the one recorded. The predominant sidewalk width was recorded for the length of the block from one intersection to the next. In addition, a separate database was developed to inventory specific pedestrian access route (PAR) 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, such as flare slope (typically each ramp has two flares), differed, the worst measure for accessibility was recorded.

To improve 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 first measured. 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 County to quickly identify which ramps create larger barriers to users and would need to be replaced without collecting data that was deemed irrelevant if the curb ramp needed full replacement. This helped reduce data collection time while still providing the County with accurate data for decision making

The physical inventory included;

- over 53 miles of existing sidewalks, paved shoulder walkways, paved separated walkways
- 1091 curb ramps
- 24 signal pushbuttons
- 261 bus stops
- 2 accessible parking stalls
- over 1850 hazards

The attributes of each feature type were developed using WSDOT’s Field Guide for Accessible Public Rights of Way along with the United States Access Board’s PROWAG as a baseline, with edits based on feedback from County staff. Appendix E and the GIS data base show the exact location of each inventory item surveyed and identify non-compliant facilities.

2.2.2 Findings

The following sections detail the primary barriers inventoried and analyzed for ADA compliance. The barriers found applied to different features including curb ramps, sidewalks, discontinuities and obstacles in pedestrian routes, and pedestrian pushbuttons. State and Federal regulations dictate that curb ramps and sidewalks be ADA compliant. The result of the inventory analysis showed that most ADA features within the public right-of-way are in need of improvement to meet requirements.

2.2.2.1 Curb Ramps

The data collected to evaluate curb ramp compliance was divided into three overarching

categories: compliant, minor non-compliant and major non-compliance. A ramp was found to be compliant only if all collected features of the ramp met the required accessibility standards. Both non-compliant categories represent barriers to accessibility that will require attention such as, reconstruction or new ramps. While compliant ramps require no modification. The majority of the existing curb ramps were found to be non-compliant based on current ADA requirements. A ramp was found to be a major non-compliance, if the ramp width was too narrow or if the run or cross slopes were overly steep. A ramp was found to be a minor non-compliance if the barrier was easily removed with maintenance, or if run or cross slopes were only slightly steeper than standard. Figure 2-1 shows a sample of the curb ramps surveyed in the County and the percentage of non-compliant to compliant curb ramps within the County. All non-compliant curb ramps will need to be addressed and all barriers removed, minor and major non-compliances are used to show the level of severity of curb ramp barriers. Compliant, minor non-compliant, and major non-compliant curb ramps are shown in blue, yellow, and red, respectively.

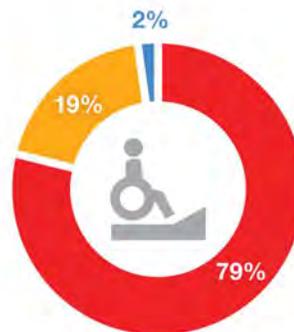


Figure 2-1 Percentage of Major and Minor Non-Compliant Curb Ramps and Compliant Curb Ramps

2.2.2.2 Sidewalks

Most sidewalks in the Whatcom County are non-compliant based on ADA requirements. The most frequent reasons for non-compliant sidewalk segments are:

- The sidewalk width is too narrow
- The cross slope of the sidewalk is too steep
- The sidewalk has fixed/non-fixed barriers and other discontinuities that impede required usable pedestrian space
- Non-compliant driveways intersect the sidewalk

Figure 2-2 shows a sample of the sidewalks surveyed in the County and demonstrates the percentage of sidewalk length that is compliant and non-compliant throughout the County. Non-compliant sidewalks are broken into two categories, minor and major non-compliant. For example; a sidewalk is considered to be a major non-compliance if the width is too narrow, or if the cross or run slopes are overly steep. A sidewalk segment with cross or run slopes only

slightly steeper than standard were considered minor non-compliances. All non-compliant sidewalk segments will need to be addressed and all barriers removed, minor and major non-compliances are used to show the level of severity of sidewalk barriers. Compliant, minor non-compliant, and major non-compliant sidewalks are shown in blue, yellow, and red, respectively.

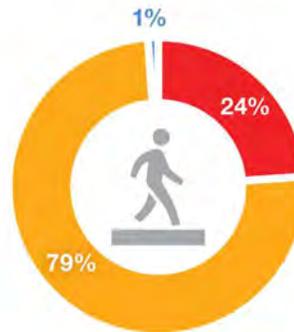


Figure 2-2 Percentage of Major and Minor Non-Compliant Sidewalk and Compliant Sidewalk

2.2.2.3 Pedestrian Pushbuttons

Accessible Pedestrian Signals (APS) and Pushbuttons is an integrated system that communicates to pedestrians in a visual, audible, and vibrotactile manner. There are 24 pushbuttons in the Whatcom County, 18 of these pushbuttons are non-APS style and therefore do not meet current ADA requirements. The remaining 6 pushbuttons are APS style but will require some modifications to be fully compliant. There are two categories of required upgrades, buttons that need to be relocated and reprogrammed, and non-APS buttons that need to be replaced. Figure 2-3 shows a sample of the pedestrian pushbuttons surveyed in the County and demonstrates the percentage of pushbuttons in each category throughout the County. APS style and non-APS

style pushbuttons are shown in blue and red, respectively.

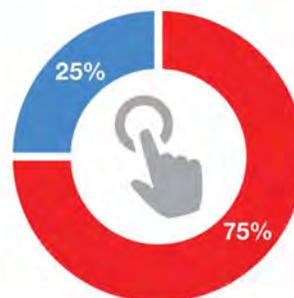


Figure 2-3 Percentage of APS Style and Non-APS Style Pushbuttons

2.2.2.4 Whatcom Chief Ferry

The Whatcom Chief Ferry is primarily a commuter ferry for the residents of Lummi Island. It is also the only access point for the island for tourists and other visitors. The ferry makes approximately 40 round trips per day between Gooseberry Point and Lummi Island. The existing ferry allows for walk-on passengers but the ferry docks have very limited pedestrian facilities. Walk-on passengers must use the vehicular roadways and ramps to board and disembark the ferry. With regards to accessibility, these roadways and ramps have several barriers including vertical and horizontal discontinuities, non-compliant slopes, non-compliant ramps, and no designated pedestrian route.

Both docks have parking spaces marked as accessible that are used sporadically. There is also a bus stop on the Gooseberry Point side. Restrooms are present at the Lummi Island dock but not at the Gooseberry Point dock. There are no dedicated pedestrian facilities between these features and the ferry docks and pedestrians use the adjacent roadway pavement to access these facilities.

The ferry itself has a small indoor passenger area but no accessible ingress or egress point. There are several large vertical hazards between the loading point and the passenger compartment.

In addition to the vehicular ferry, a passenger only ferry is also used for several weeks in the fall while the vehicular ferry is in dry dock for maintenance. This boat was not assessed as part of the self-assessment but interviews with ferry and county staff indicate that accessibility is a challenge with the passenger ferry as well. In particular, ingress and egress to the ferry can be challenging and the ferry is not able to accommodate larger powered wheelchairs.

As of the publication of this report the County has a preliminary design for a new ferry and is working to obtain funding. The new ferry will address the accessibility issues mentioned above and will be more accessible. As these plans are implemented, it is recommended that the County also remove barriers at both docks to provide a fully accessible route for pedestrians.

2.3 GIS Inventory Database

As a part of the self-assessment an extensive GIS database was created to assist with tracking progress through barrier removal. The database contains each attribute that was inventoried and all data that was collected for each attribute.

This database was provided to the county and will be used and updated in the ongoing efforts to bring the county into compliance with the ADA standards.