

Public Right-of-Way ADA (Americans with Disabilities Act) Self-Evaluation and Transition Plan



November 2025

Prepared by



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List of Abbreviations

ADA – American with Disabilities Act

ADA/504 – Americans with Disabilities Act/Section 504 of the Rehabilitation Act of 1973

APS – Accessible Pedestrian Signal

CFR – Code of Federal Regulations (United States)

DWS – Detectable Warning System

FHWA – Federal Highway Administration

GIS – Geographic Information System

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

MEF – Maximum Extent Feasible

NCHRP – National Cooperative Highways Research Program

PAR – Pedestrian Access Route

PROW – Public Right-of-Way

PROWAG – Public Right-of-Way Accessibility Guidelines (final rule September 7, 2023)

RRFB – Rectangular Rapid Flashing Beacon

USDOJ – United States Department of Justice

USDOT – United States Department of Transportation

WSDOT – Washington State Department of Transportation

Executive Summary

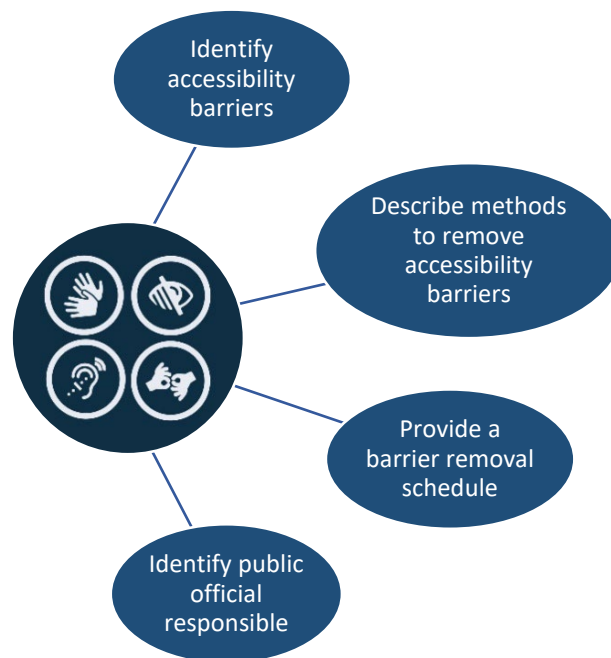
The City of Aberdeen is committed to removing barriers to accessibility in the public right-of-way including streets, roads, and paved pedestrian routes. To achieve this end, the City has completed a Public Right-of-Way (PROW) Americans with Disabilities Act (ADA) Self-Evaluation and Transition Plan.

What is the City of Aberdeen's PROW ADA Self-Evaluation and Transition Plan?

The City of Aberdeen has created a plan to make its public right-of-way (PROW) facilities easier to use for people with disabilities. This plan lists barriers that make it hard for people to access Aberdeen and suggests ways to fix them.

Local governments are required to find and fix barriers to accessibility for people with disabilities. This Public Right-of-Way (PROW) ADA Transition Plan must do four things:

1. **Find barriers** that make it hard for people with disabilities to access the public right-of-way.
2. **Figure out how to fix the barriers and how much it costs** to fix the barriers.
3. Decide when to fix barriers with a **schedule**.
4. Pick a **person in the City leadership** who will make sure barriers are fixed each schedule year.



This Plan is about **physical** barriers in the City's **public right-of-way** along pedestrian access routes and at pedestrian crossings.

Future updates to the Plan will look at accessibility barriers in the City of Aberdeen's programs, services, activities, buildings, and parks, when funding is available.

What are public right-of-way facilities in the City of Aberdeen?

Public right-of-way facilities addressed include:

- Curb ramps
- Sidewalks
- Driveways where they intersect sidewalks
- Accessible pedestrian signals and flashing beacons at pedestrian crossings
- Paved paths designated as pedestrian access routes

Why does the City of Aberdeen need an ADA Self-Evaluation and Transition Plan?

Cities in the State of Washington must have an ADA Transition Plan or Program Access Plan because of federal law. Title II of the ***Americans with Disabilities Act (ADA)*** of 1990 is a rule for all non-federal public entities or agencies, including cities like the City of Aberdeen. This law makes it illegal for the City of Aberdeen to discriminate against people with disabilities.

The Washington State Department of Transportation (***WSDOT***) ***Local Agency Guidelines (LAG) Manual*** Chapter 29 includes ADA Transition Plan requirements for local agencies with 50 or more employees and ADA Program Access Plan requirements for local agencies with less than 50 employees.



Photo of former president George H.W. Bush signing the ADA on July 26, 1990. Source: whitehousehistory.org.

What ADA barriers did the City find in Aberdeen's public right-of-way facilities?

The City hired a consultant to conduct an inventory and condition assessment by taking notes, photographs, and measurements of curb ramps, driveways, sidewalks, paved paths, and pedestrian crossings at City-maintained signalized intersections and rectangular rapid flashing beacon (RRFB) pedestrian crossings. The data was collected in geographic information system (GIS) format for use by the City's GIS staff. Overview maps of the collected data are included in this Plan for public view.

How does the City choose which barriers to fix before others?

There are many reasons that can influence how cities pick which barriers to fix before others. City staff asked the following questions when creating this Plan's schedule to fix barriers:

- Are we making sure our **existing planned projects** will fix ADA barriers?
- Which barriers do **people in our community** want fixed before others?
- What **resources** (money, personnel, etc.) are available this year and in future years to fix ADA barriers?

How was the City of Aberdeen community involved in the making of this Plan?

The Draft ADA Transition Plan was shared for public comment in late October 2025 and promoted through the *Aberdeen Matters* newsletter, *The Daily World* news publication, utility billings, and City newsflash and social media platforms. Direct emails were sent to the following local organizations to engage with local community members with disabilities, their family members, and/or service providers.

- Aberdeen School District
- Aberdeen Senior Center
- Arc of Grays Harbor
- Aberdeen Branch of Timberland Regional Library
- Coastal Community Action Program
- Grays Harbor College Accessibility Services
- Greater Grays Harbor, Inc
- Washington State Department of Social and Health Services (DSHS) staff shared with Developmental Disabilities clients

How will the City use the public feedback to prioritize ADA barriers for removal?

The City will review and incorporate the public comments for the yearly assessment of transportation project priorities.

How much does it cost to remove the barriers found at Public Right-of-Way facilities?

This Plan includes construction cost estimates to fix all the listed curb ramp, sidewalk, driveway, paved path, and pedestrian crossing barriers.

BARRIER TYPE	COUNT OF BARRIERS	CONSTRUCTION COST ESTIMATE (\$2025)
Curb Ramps	1,171	\$15,808,500
Driveways	2,054	\$33,274,800
Sidewalks*	22.50 miles	\$44,550,000
Paved Paths*	0.49 miles	\$479,000
Accessible Pedestrian Signals (APS)	2 intersections	\$1,000,000
Rectangular Rapid Flashing Beacon (RRFB) Pedestrian Crossings	No barriers	\$0
TOTAL		\$95,112,300

*Sidewalks and Paved Paths based on sampled data.

How will the City pay for fixing or removing barriers?

The City will pay for barrier removal primarily out of its City budget. Federal and State grant funding is also a potential source of ADA barrier removal funding.

The City has \$100,000 available in its **ADA Transition Plan Program** budget for years 2025-2028 (\$25,000 annually) specifically dedicated to ADA barrier removal.

Which barriers will the City fix next?

The City anticipates being able to fix 8-10 curb ramps per year.

Some curb ramps improvements will be funded by the **ADA Transition Plan Program** and supplemented by City Public Works Department maintenance activities.

The City also has the opportunity to remove ADA barriers through planned transportation improvement projects.

The following table shows the anticipated ADA barriers that will be removed through 2030:

BARRIER TYPE	PLANNED BARRIER REMOVAL 2025-2030	REMAINING BARRIERS TO ADDRESS 2031 ONWARD
Curb Ramp	70 curb ramp barriers	1,101
Driveway	18 driveway barriers	2,036
Sidewalk	7,150 linear feet (~1.23 miles) of sidewalk barriers	21.27 miles
Paved Path	0 linear feet of paved path barriers	0.49 miles
APS	2 signalized intersections	0
RRFB	No barriers as of October 2025	0

How will the City keep track of ADA barrier removal?

Each year, the City will share an ADA Progress Report on ADA barrier removal projects for that year. The ADA Progress Report will:

- Keep a list and/or map of the fixed barriers identified in this Plan.
- Keep a list of ADA-related requests from the public.
- Keep a list of received ADA grievances and show how City staff responded.

Who is the person in City leadership who will make sure barriers are fixed?

Rick Sangder, Public Works Director, is the official responsible for making sure barriers listed in this Plan are fixed, that yearly ADA progress reports are provided, and that the Plan be updated every five years. If you have questions about the content of this report, please contact Rick Sangder at (360) 537-3228 or via email at rsangder@aberdeenwa.gov.

How do I tell the City when I find an ADA barrier?

If you would like to report a physical ADA barrier in the public right-of-way, please email the City's PROW ADA Transition Plan Project Manager, Gabriela Virgen-Hashagen, Engineer, at gvmhashagen@aberdeenwa.org or call (360) 537-3205.

If you would like to report an ADA barrier to City services, programs, or activities, please contact the City's ADA/504 Coordinator, Dani Smith, Human Resources Director, by email at adacoordinator@aberdeenwa.gov or call (360) 537-3207 (TTY 7-1-1).

A. Introduction & Legal Requirements

The City of Aberdeen is committed to removing barriers to accessibility in its services, programs, and activities. To achieve this end, the city has completed an Americans With Disabilities Act (ADA) Self-Evaluation and Transition Plan for the Public Right-of-Way.

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

A.1 Legal Precedent

The following federal laws and local Washington State guidelines informed the content and scope of this ADA Self-Evaluation and Transition Plan. See [WSDOT Local Agency Guidelines](#) Chapter 29 (September 2023).

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

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

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

A.1.2 American with Disabilities Act (ADA)

The *Americans with Disabilities Act* (ADA) of 1990 is a civil rights statute that prohibits discrimination against people who have disabilities. There are five separate Titles, or sections, of the Act that cover different aspects of potential discrimination. These include: Title I – Employment, Title II – Public Services and Transportation, Title III – Public Accommodations, Title IV – Telecommunications, and Title V – Miscellaneous. Title II of the Act specifically addresses the subject of making public services and public transportation accessible to those with disabilities. Designing and constructing facilities for public use that are not accessible by people with disabilities constitutes discrimination.

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

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

A.2 Scope of ADA Transition Plan

A.2.1 Federal ADA Transition Plan Requirements

Under Title II of the ADA, Section 28 CFR Part 35.150 (d) - *Transition Plan* outlines four requirements of an ADA Transition Plan. For full code text, see **Appendix A1**.

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

A.2.2 Federal Accessibility Requirements for Existing Facilities

Section 28 § 35.150 of Title II of the ADA identifies the accessibility requirements for existing facilities. For full code text, see **Appendix A1**.

Of note is section 28 CFR § 35.150 Existing facilities (b) (2) (i) *Safe harbor*. Elements that have not been altered in existing facilities on or after March 15, 2012 and that comply with the corresponding technical and scoping specifications for those elements in either the 1991 Standards or in the Uniform Federal Accessibility Standards (UFAS), Appendix A to 41 CFR part 101-19.6 (July 1, 2002 ed.), 49 FR 31528, app. A (Aug. 7, 1984) are not required to be modified in order to comply with the requirements set forth in the 2010 Standards.

A.2.3 Federal Accessibility Requirements for New Construction or Alterations

Section 28 § 35.151 of Title II of the ADA identifies the accessibility requirements for new construction or alterations to existing facilities. For full code text, see **Appendix A1**.

Of note is section 28 CFR § 35.151 New Construction and alterations, (b) (4) (ii) (C) *Safe Harbor*. If a public entity has constructed or altered required elements of a path of travel in accordance with the specifications in either the 1991 Standards or the Uniform Federal Accessibility Standards before March 15, 2012, the public entity is not required to retrofit such elements to reflect incremental changes in the 2010 Standards solely because of an alteration to a primary function area served by that path of travel.

In 2025, the City of Aberdeen public right-of-way facilities were evaluated against the 2010 ADA Standards as it is the enforceable standard for the facility types the regulation covers.

A.2.4 Public Right-of-Way Accessibility Guidelines (PROWAG)

The 2023 PROWAG addresses accessibility at facilities not covered by the 2010 ADA Standards. These include accessibility at pedestrian signal heads and pedestrian activated warning devices, also known as accessible pedestrian signals (APS) and rectangular rapid flashing beacons (RRFBs) respectively. The 2023 PROWAG also includes increased curb ramp width, landing, and other curb ramp features that exceed the minimum requirements of the 2010 ADA standards. PROWAG guidelines are considered current best practice.

In 2025, City of Aberdeen public right-of-way facilities that also met PROWAG guidelines were identified.

A.2.5 WSDOT Local Agency Guidelines

The Washington State Department of Transportation (WSDOT) Local Agency Guidelines (LAG) Chapter 29 includes additional items per Section 504 that calls on agencies to:

- Designate an ADA/504 Coordinator
- Adopt and publish an ADA Complaint/Grievance Procedure
- Adopt an Accessible Pedestrian System (APS) Policy

For the WSDOT Local Agency Guidelines Chapter 29, including ADA Transition Plan Checklist, see **Appendix A2**.

A.2.6 ADA Transition Plan Format

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

The City is taking a phased approach to addressing ADA barriers, starting with this public right-of-way focused plan. ADA barriers at other City facilities, such as city buildings, park facilities, or barriers related to city services, programs, or activities, will be addressed by other ADA transition plans the City will address at a future date.

A.3 Where To Access PROW ADA Transition Plan

The City's website has a dedicated webpage for the PROW ADA Transition Plan and related information available at: <https://www.aberdeenwa.gov/607/ADA-Transition-plan>.

B. Administrative Policies & Procedures

In 2025, the city's existing ADA-related administrative policies and procedures were established to match those required by the WSDOT LAG Manual Chapter 29 Checklist. See **Appendix A2**.

B.1 Official Responsible to Implement the PROW ADA Transition Plan

Rick Sangder, Public Works Director, is the official responsible for making sure barriers listed in this Plan are fixed, that yearly ADA progress reports are provided, and that the Plan be updated every five years. If you have questions about the content of this report, Rick's contact information is:

Rick Sangder, Public Works Director
City of Aberdeen
200 E Market Street
Aberdeen, WA 98520
Phone: 360-537-3228 (Washington Relay System: 7-1-1)
E-mail: rsangder@aberdeenwa.gov

B.2 ADA/504 Coordinator

The city has designated the Human Resources Director as the city's ADA/504 Coordinator.

Dani Smith, ADA/504 Coordinator and Human Resources Director
City of Aberdeen
200 E Market Street
Aberdeen, WA 98520
Phone: 360-537-3207 (Washington Relay System: 7-1-1)
E-mail: adacoordinator@aberdeenwa.gov

B.3 Public Notice of ADA Provisions

The notice requirement applies to all state and local governments covered by Title II, even localities fewer than 50 employees. The target audience for public notice includes anyone who may potentially interact with the agency and must be accessible to all. An effective notice states the basis of what the ADA requires of the public agency in clear, concise language and should include the name and contact information of the ADA Coordinator. It addresses the public agency's commitment to non-discrimination on the basis of disability and addresses the agency's associated policies regarding employment, effective communication, modifications to policies and procedures, provision of auxiliary aids, scope of the ADA, complaints, and provision of aid/services at no additional cost.

The U.S. Department of Justice's ADA Best Practices Tool Kit for Local and State Governments provides a [template ADA Notice](#) for use by public agencies. The city has publicly posted its Public Notice of ADA Provisions on the city's webpage at <https://www.aberdeenwa.gov/255/Americans-with-Disabilities-Act-Notice> and in **Appendix B1**.

B.4 ADA Grievance Procedure

The city has publicly posted its ADA Grievance Procedure and established an internal record for grievances/complaints. The Grievance Procedure and submittal forms are posted on the city's webpage at <https://www.aberdeenwa.gov/607/ADA-Transition-plan> and in **Appendix B2**.

B.5 Accessible Pedestrian Signal and Pushbutton (APS) Policy

The city established an APS Policy as part of this ADA Transition Plan. The APS Policy is provided in **Appendix B3**.

B.6 How to Report an ADA Barrier

If you would like to report a physical ADA barrier in the public right-of-way, please email the City's PROW ADA Transition Plan Project Manager, Gabriela Virgen-Hashagen, Engineer, at gvmhashagen@aberdeenwa.org or call (360) 537-3205.

If you would like to report an ADA barrier to City services, programs, or activities, please contact the City's ADA/504 Coordinator, Dani Smith, Human Resources Director, by email at adacoordinator@aberdeenwa.gov or call (360) 537-3207 (TTY 7-1-1).

B.7 Sidewalk Maintenance Responsibility

The City of Aberdeen, a "first-class city," should adopt a local ordinance consistent with and implementing chapter RCW 35.69 assigning responsibility for accessible sidewalk and non-motorized facility construction and maintenance to abutting property owners.

C. Public Right-of-Way

This chapter begins with the City of Aberdeen **self-evaluation** findings for each of the public right-of-way (PROW) facility types evaluated for ADA compliance in spring 2025. These PROW facilities types include: curb ramps, driveways, sidewalks, paved paths, accessible pedestrian signals, and rectangular rapid flashing beacons. Further chapter sections focus on barrier **prioritization** and barrier removal **cost estimates**. The chapter concludes with a **financial implementation plan and schedule** to remove the ADA barriers over time.

C.1 Public Right-of-Way (PROW) Self-Evaluation

The City of Aberdeen uses geographic information system (GIS) mapping tools to track the location and condition of its PROW assets. Each PROW asset type in this plan has an associated GIS layer. This format gives City staff a spatial understanding of where compliant and non-compliant infrastructure exists.

C.1.1 Curb Ramps

The City's existing GIS curb ramp inventory of 1,842 curb ramp assets was updated to a new total of 2,025. Aerial imagery and Google® street view data were used to assign an ADA compliant or non-compliant status for each curb ramp. Where online data was insufficient to determine ADA compliance, in-person field evaluations were performed at 754 curb ramp locations (37% of inventory).

The curb ramp data collected during field evaluations included: ramp running and cross slopes, landing size, landing running and cross slopes, ramp width, detectable warning surface presence and type, and a photo.

Of the city's 2,025 curb ramp locations, 808 (40%) are ADA-compliant with the 2010 ADA Standards, the current enforceable standard. See **Table C-1**.



Photo of compliant curb ramp with required width, running slope, cross slope, and detectable warning surface (DWS) on SE corner of SR 105 and Edward P. Smith Drive.

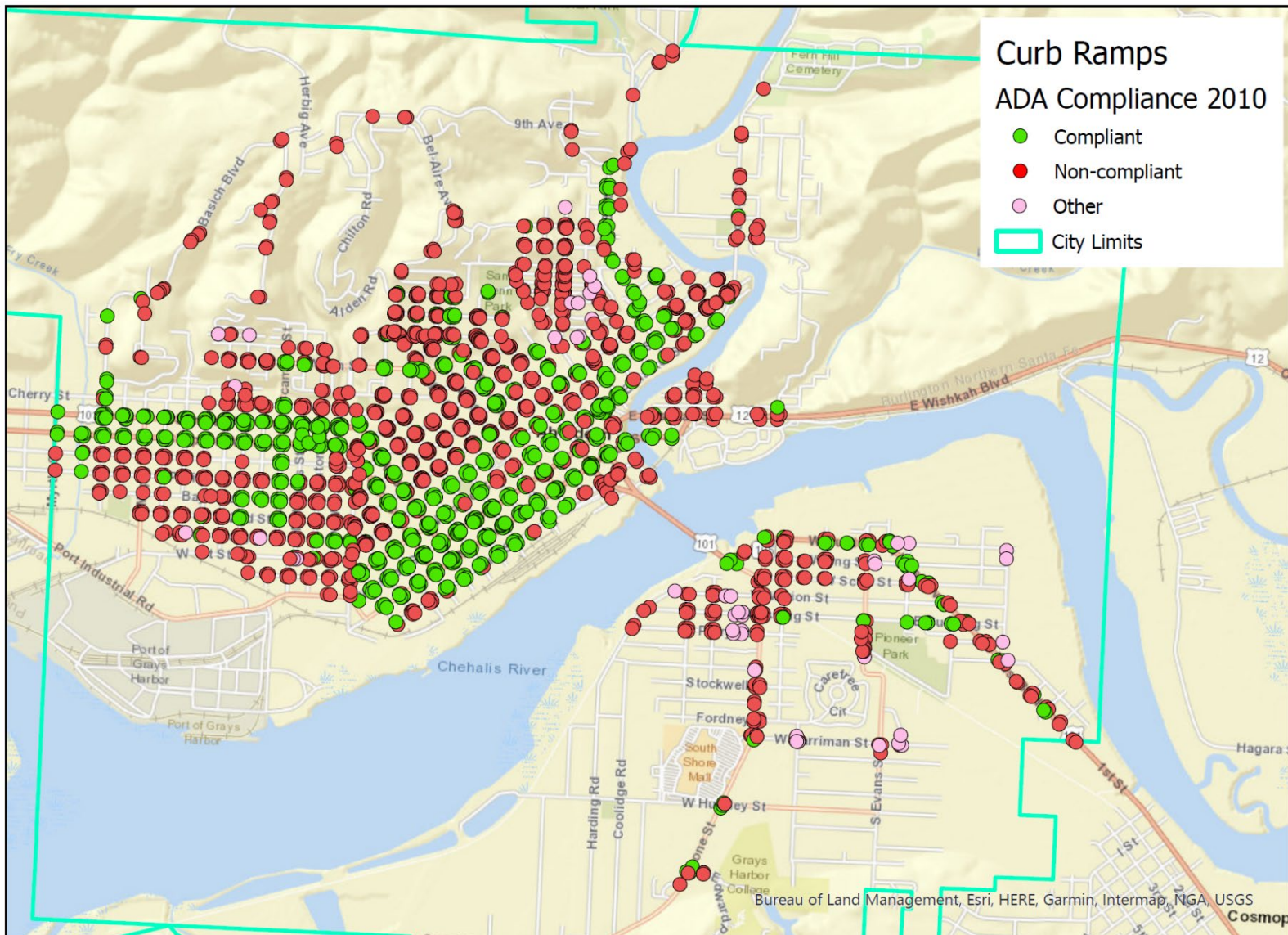
Table C-1. 2025 City of Aberdeen Curb Ramp Inventory by ADA Compliance

2010 ADA Compliance	Count #	Percentage %
Compliant	808	40%
Non-Compliant	1,171	58%
Other (asphalt transition to areas along streets and roadways not intended as pedestrian access routes)	46	2%
Total	2,025	100%

For a map of the city's curb ramp inventory by ADA compliance, see **Figure C-1**.

Collected curb ramp data is provided in **Appendix C1**.

Figure C-1. 2025 City of Aberdeen Curb Ramp Inventory by ADA Compliance



C.1.2 Driveways

In 2025, the City created a new inventory of driveways totaling 2,469 assets. Driveways are part of pedestrian access routes where they intersect sidewalks.

To conserve City resources, aerial imagery and Google® street view data were used to assign an ADA compliant or non-compliant status for each driveway. Where online data was insufficient to determine ADA compliance, in-person field evaluations were performed at 672 driveway locations (27% of inventory).

The driveway data collected during field evaluations included: width, cross slopes, ramp running and cross slopes for those with approaching ramps, and a photo.

Of the city's 2,469 driveway locations, 415 (17%) are ADA-compliant with the 2010 ADA Standards, the current enforceable standard. See **Table C-2**.

Note: Some of the 2,054 non-compliant driveways are part of sidewalk segments that do not include a curb and gutter (i.e., the driveway is flush with the sidewalk). These include the driveways in the residential neighborhoods of southeast Aberdeen along E Curtis St, E King St, E Scott, W Marion St, W Cushing St, and W Perry St. Driveways along such non-curbed pedestrian access routes could be addressed through sidewalk repair projects.



Photo of a compliant driveway and sidewalk interface with required width, running slope, and cross slope on Morgan St in the City of Aberdeen.

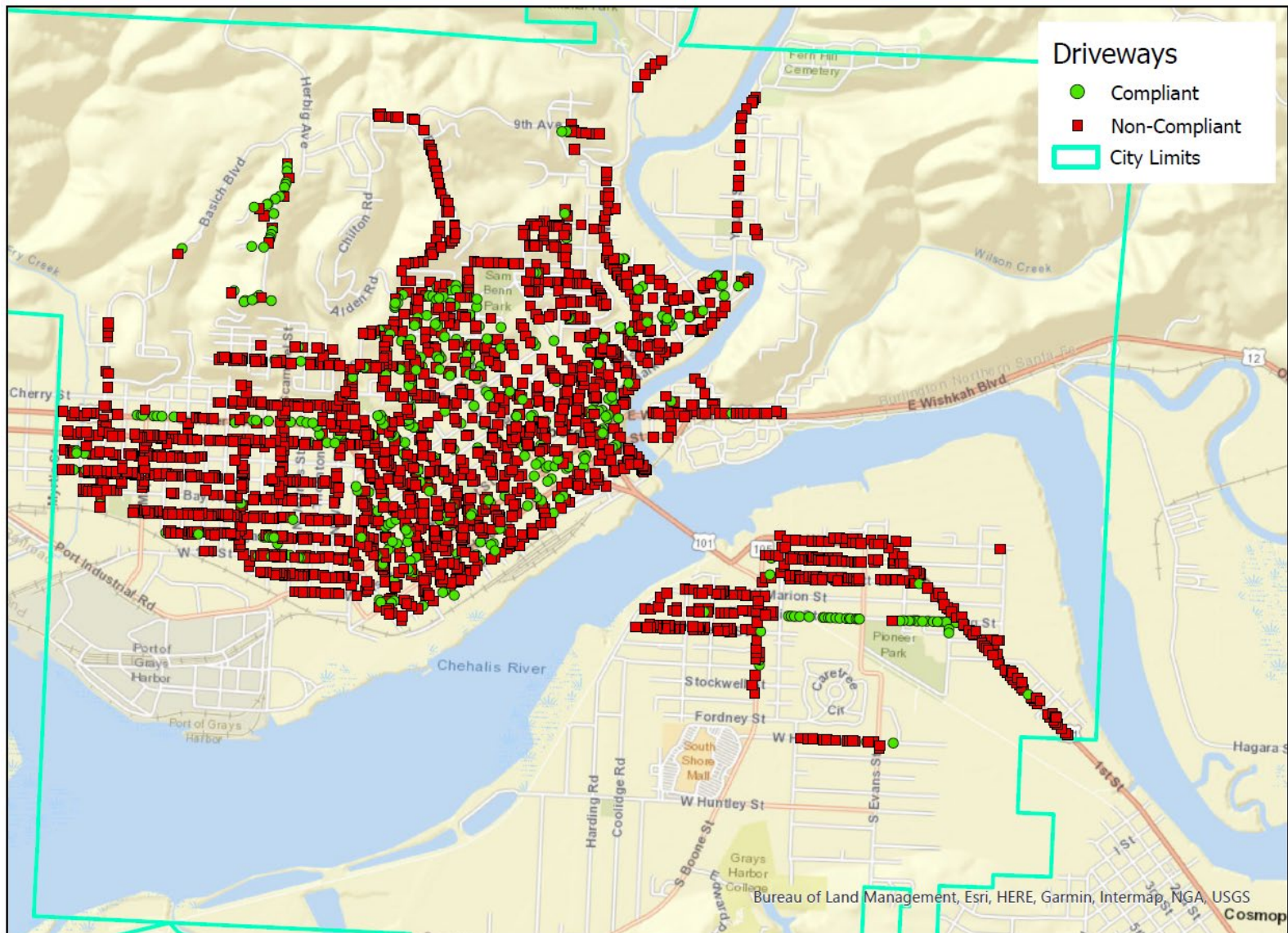
Table C-2. 2025 City of Aberdeen Driveway Inventory by ADA Compliance

2010 ADA Compliance	Count #	Percentage %
Compliant	415	17%
Non-Compliant	2,054	83%
Total	2,469	100%

For a map of the city's driveway inventory by ADA compliance, see **Figure C-2**.

Collected driveway data is provided in **Appendix C2**.

Figure C-2. 2025 City of Aberdeen Driveway Inventory by ADA Compliance



C.1.3 Sidewalks

The City of Aberdeen has approximately 78 miles of existing sidewalk infrastructure of varying age and condition. Sidewalks in Aberdeen’s residential areas are older and deteriorating after many years of use and being subject to various loads. Throughout the City, sidewalks often became overgrown with vegetation. Tree roots that grow shallow underneath the sidewalk also cause concrete panel cracking and upheaval over time.

The project team opted to evaluate sidewalks for ADA compliance based on GIS data of the City’s annual sidewalk review as well as targeted spot checks of sidewalk infrastructure along the City of Aberdeen’s arterial streets.



Photo of a compliant sidewalk on F Street north between Market St and Wishkah Blvd.

Annual Sidewalk Review

Since 2015, City crews perform an annual review off Aberdeen’s sidewalks for hazards. The crews gathered data relevant to ADA compliance including cross slope, running slope, width, vertical discontinuities, and passing spaces in the matrix below.

SIDEWALK REVIEW MATRIX COMPONENTS	REPLACE	NO NEED TO REPLACE
Cross Slope of walking surfaces (perpendicular with sidewalk)	Steeper than 1/48	Not Steeper than 1/48
Running Slope of Walking Surfaces (parallel with sidewalk)	Steeper than 1/20**	Not Steeper than 1/20
Clear Width*	Is less than 36"	Is 36" or more.
Vertical Separation	More than 1/4 inch	Less than 1/4 inch
Passing Spaces - 5' of Clear width or Less*	200' or More	200' or Less

*Exceptions/Additional information available - See 2010 ADA Standards for Accessible Design.

** Unless the roadway is on a hill – then the sidewalk will follow the road’s grade.

Sidewalk Spot Checks

Sidewalk spot checks for ADA compliance were also performed along the City’s arterial streets in summer 2025. Sidewalk data collection included: width, cross slope, obstacle type (if present), notes, and a photo.

Spot checks represent a sampling of the City’s total sidewalk inventory and do not represent the total length of a sidewalk segment. The spot check non-compliance percentage was used to calculate an initial conservative non-compliant mileage amount. It was then assumed that 50% of the non-compliant sidewalk mileage would require improvements (the actual non-compliant sidewalk mileage may differ).

This method used to determine non-compliant sidewalk mileage requiring improvements is consistent with the City’s 2025 Sidewalk Survey that identified approximately 20 miles of non-compliant sidewalk segments but did not cover all sidewalk segments within City limits.

The sidewalk spot checks and estimated mileage ADA compliance findings are shown in **Table C-3**.

Table C-3. 2025 City of Aberdeen Sidewalk Inventory by ADA Compliance

2010 ADA Compliance	Count of Spot Checks*	% Spot Checks	Mileage (Estimated)	Mileage Requiring Improvements**
Compliant	167	42%	33 miles	0 miles
Non-Compliant	233	58%	45 miles	22.5 miles
Total	400	100%	78 miles	22.5 miles

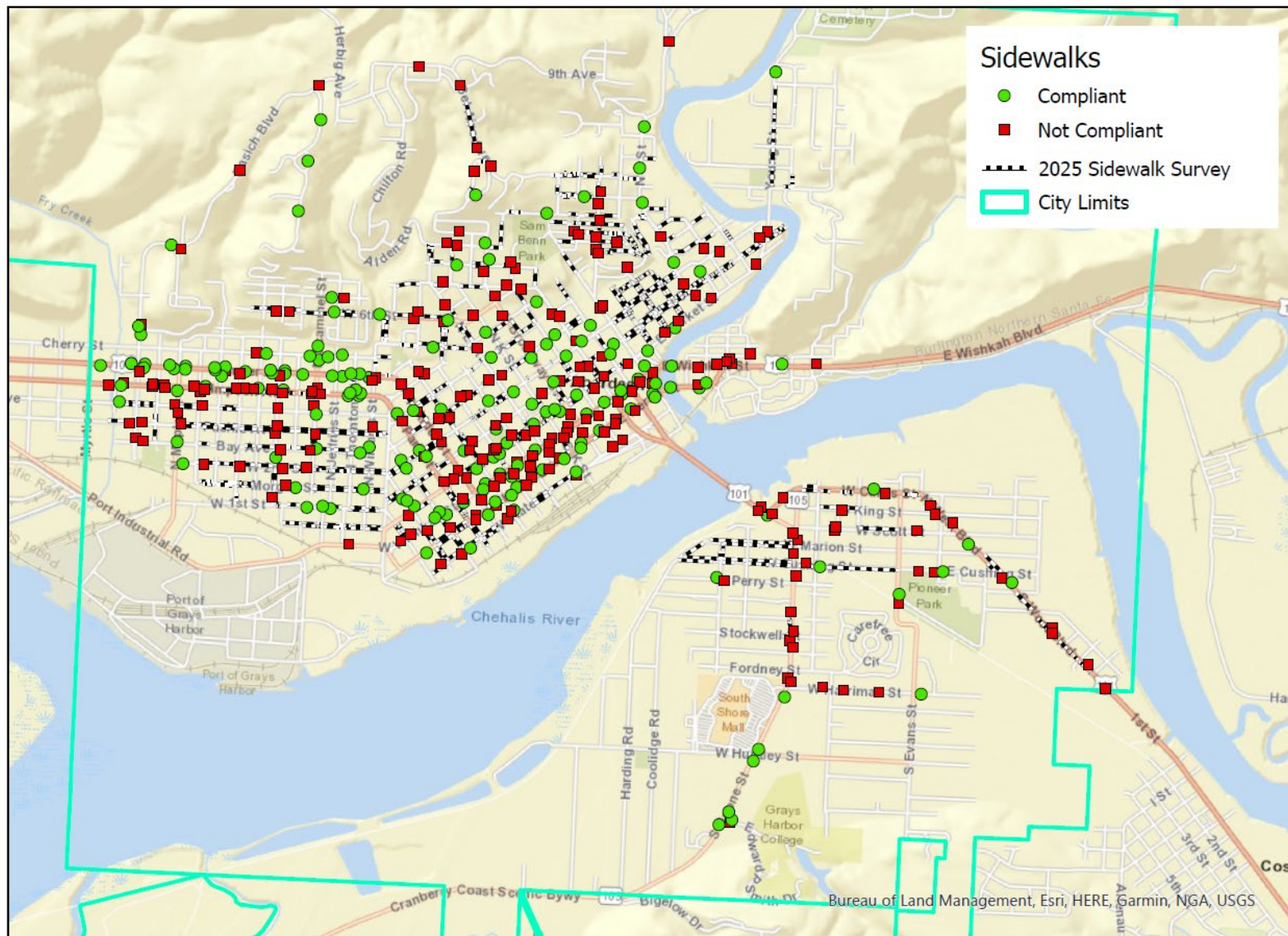
*Spot checks represent a sampling of the City's total sidewalk inventory.

**Assumes 50% of the non-compliant sidewalk mileage would require improvements (the actual non-compliant sidewalk mileage may differ).

For a map of the City's sidewalk spot checks by ADA compliance and data for 20 miles of sidewalk from the 2025 Sidewalk Survey, see **Figure C-3**.

Collected sidewalk data is provided in **Appendix C3**.

Figure C-3. 2025 City of Aberdeen Sidewalk Inventory by ADA Compliance



C.1.4 Paved Paths

The City created a new ADA inventory for 5.53 miles of paved paths. Paved paths, including shared use paths (SUPs), are a type of pedestrian access route and should therefore meet ADA standards.

In-person field evaluations included random spot checks at 69 locations along the following paved paths within the City of Aberdeen:

- Basich Trail (0.86 mi)
- Chehalis Riverfront Walkway (2.85 mi)
- East Aberdeen Waterfront Trail (1.74 mi)
- Fry Creek Pedestrian Path (0.08 mi)



Photo of a compliant section of the Chehalis Riverfront Walkway that meets ADA requirements for width, running slope, and cross slope.

The spot location approach used for paved paths means there could be more non-compliant locations along these routes. More detailed data collection was outside the scope of this self-evaluation effort. The paved path data collected during field evaluations included: width, cross slope, and/or obstacles (if present), and a photo.

Of the city's 69 paved path spot locations evaluated, 20 (29%) are ADA-compliant with the 2010 ADA Standards, the current enforceable standard. The compliance percentages are for the spot locations only. The spot check non-compliance count (49) was used to calculate non-compliant paved path segments to fix identified barriers. See **Table C-4**.

Table C-4. 2025 City of Aberdeen Paved Path Inventory by ADA Compliance

2010 ADA Compliance	Count of Spot Checks*	Percentage %	Mileage† (Estimated)
Compliant	20	29%	5.04 miles
Non-Compliant	49	71%	0.49 miles
Total	69	100%	5.53 miles

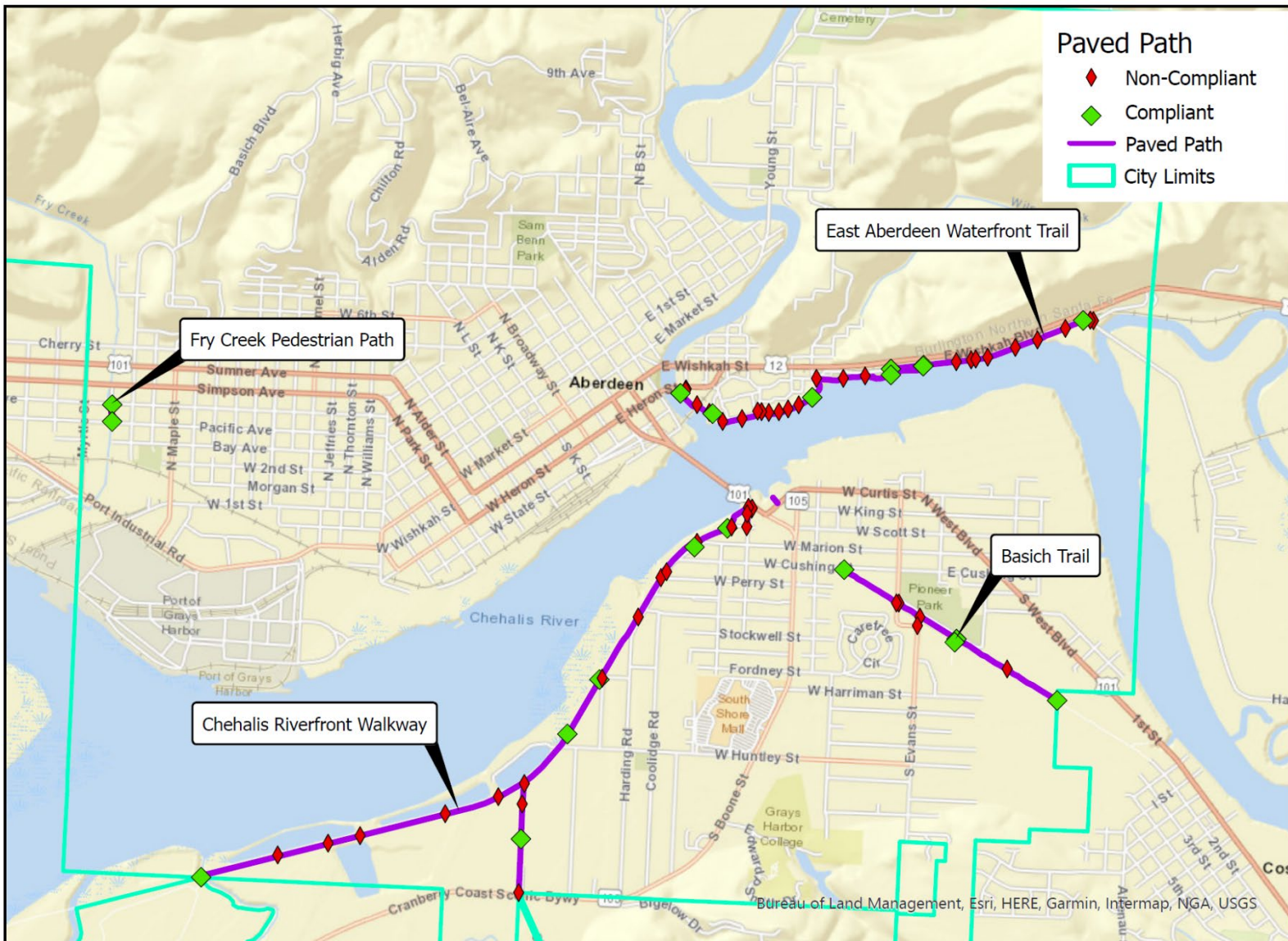
*Spot checks represent a sampling of the City's total sidewalk inventory.

†The estimated non-compliant mileage is the count of non-compliant spot checks multiplied by 0.01 miles (the actual non-compliant mileage may differ).

The **Fry Creek Pedestrian Path** was constructed in 2025 and is ADA compliant. The **Basich Trail** lacks detectable warning surfaces at the pedestrian crossing of S Lawrence St and has cross slopes up to 3.1%. The **Chehalis Riverfront Walkway** has multiple road crossings for dike access that lack detectable warning surfaces and has cross slopes up to 6.2%. One location with bollards does not meet the minimum 36-inch width requirement for a pedestrian access route. Various divots and empty bollard mount holes create additional tripping hazards. The **East Aberdeen Waterfront Trail** has upheaval, tree roots, cracks, vegetation, and tripping hazards around sewer access hatches. There are also cross slopes up to 11%.

For a map of the city's paved path routes and the spot locations by ADA compliance along those routes, see **Figure C-4**. Collected paved path data is provided in **Appendix C4**.

Figure C-4. 2025 City of Aberdeen Paved Path Inventory by ADA Compliance



C.1.5 Accessible Pedestrian Signals (APS) at Signalized Intersections

Within the city limits of Aberdeen, there are 36 signalized intersections that are the responsibility of the City of Aberdeen or the Washington State Department of Transportation.

City of Aberdeen Signals Pending Removal Fall 2025

During the summer of 2025, five signalized intersections were in the process of being converted to stop-controlled intersections. The phased transfer replaced the signalized intersections with flashing red or yellow lights for 90 days (June through September) with permanent stop-controlled facilities scheduled for October 2025. These intersections include:

- Market St and G St
- Market St and H St
- Market St and I St
- Market St and K St
- E First St and F St

Remaining City of Aberdeen Signalized Intersections

Two signalized intersections will remain under City jurisdiction. Both intersections have outdated, non-compliant passive pedestrian signals that lack audible features (see photo at right). (Note: Passive pedestrian signals are automated and do not require presence of a pedestrian pushbutton but should have audible features to be ADA compliant.) These intersections include:

- Broadway St and Market St
- Broadway St and First St

Washington State Department of Transportation

WSDOT is responsible for the 29 signalized intersections location on state routes within the city limits of Aberdeen (US 12, US 101, and US 105). ADA evaluations were not performed for APS features at these intersection locations. For more information or to contact WSDOT about these APS facilities, see WSDOT's ADA Transition Plan available at: <https://wsdot.wa.gov/about/disability-access-concerns-ada>.

None (0%) of the signalized intersections under City of Aberdeen jurisdiction are ADA-compliant with the 2010 ADA Standards, the current enforceable standard. See **Table C-5**.

Table C-5. 2025 City of Aberdeen APS Inventory by ADA Compliance

APS ADA Compliance	Count #	Percentage %
Compliant	0	0%
Non-Compliant	2	100%
Total	2	100%

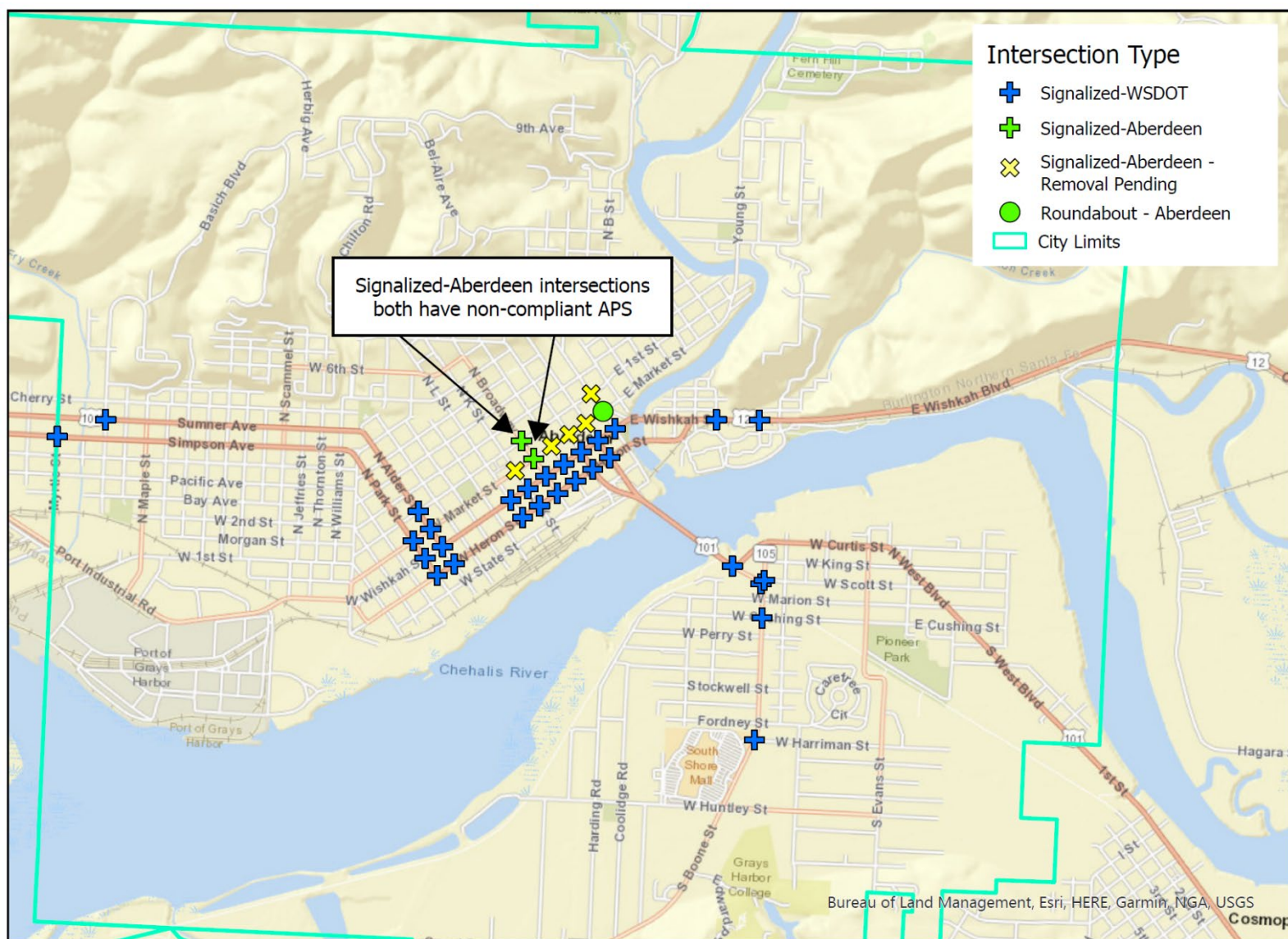


Photo of non-compliant pedestrian signal that lacks audible locator tone and crossing notification on southeast corner of Broadway St and Market St.

For a map of the signalized intersections within the city limits of Aberdeen including the ADA compliance of City-maintained APS, see **Figure C-5**.

Collected APS data is available in **Appendix C5**.

Figure C-5. 2025 City of Aberdeen APS Inventory



C.1.6 Rectangular Rapid Flashing Beacons (RRFB)

Rectangular rapid flashing beacons (RRFBs) are not specifically addressed in the 2010 ADA Standards but are addressed by the Manual on Uniform Traffic Control Devices (MUTCD). The MUTCD refers to the 2010 ADA Standards for reach (R308) and clear space (R305) requirements for the placement of pushbuttons. Since RRFBs have pushbuttons, they should comply with these reach and clear space requirements.

Note: The Public Right-of-Way Accessibility Guidelines (PROWAG) address RRFBs, but the PROWAG is not currently an enforceable standard. The City opted to evaluate RRFBs against the enforceable MUTCD requirements and collect information regarding whether they also meet the PROWAG guidelines.

Collected field inventory data included the geo-location and photos for each RRFB pushbutton, measurements for pushbutton height, reach, distance from crosswalk and curb, and clearance, as well as notating the presence or lack of a detectable warning surface (DWS), locator tone, message type (sound or spoken message), and a raised, tactile directional arrow.

The City of Aberdeen has two RRFB pedestrian crossings with a total of four pushbuttons.



Photo of compliant RRFB pushbutton on east side of SR 105 at Edward P Smith Drive that meets ADA requirements for reach and clear space and PROWAG features.

SR 105/Edward P Smith Drive at Grays Harbor College

- Pushbutton #1 meets all MUTCD requirements and PROWAG guidelines.
- Pushbutton #2 meets all MUTCD requirements and PROWAG guidelines.

E Heron Street

- Pushbutton #3 meets all MUTCD requirements and does not meet PROWAG guidelines for pushbutton type.
- Pushbutton #4 meets all MUTCD requirements and does not meet PROWAG guidelines for pushbutton type.

All of the city's four individual RRFB pushbuttons are compliant. See **Table C-6**.

Table C-6. 2025 City of Aberdeen RRFB Pushbutton Inventory by ADA Compliance

RRFB Pushbutton ADA Compliance	Count
Compliant	4
Non-Compliant	0
Total	4

For a map of the RRFB pushbuttons within the city limits of Aberdeen, see **Figure C-6**.

Collected RRFB data is available in **Appendix C6**.

Figure C-6. 2025 City of Aberdeen RRFB Inventory



C.2 Public Right-of-Way Barrier Prioritization & Removal Recommendations

There are many factors influencing which PROW barriers the City of Aberdeen will remove before other barriers, as well as where to remove those barriers. This chapter includes **general barrier prioritization criteria** to ensure the City follows its established ADA policies and procedures and prioritizes barriers identified in the ADA statute.

This chapter also includes **barrier-specific prioritization** recommendations based on other factors such as facility condition, proximity to arterial street facilities, etc.

These prioritization recommendations are designed to give the City flexibility to select ADA barriers for removal based on a combination of the general higher priority criteria as well as barrier-specific criteria.

C.2.1 General Barrier Prioritization Criteria

It is recommended that the City keep these general prioritization factors in mind when selecting which ADA barrier to remove before others:

Higher Priority

- Barriers to accessibility identified in validated grievances/complaints.*
- Barriers to accessibility identified through public engagement efforts.**
- Barriers to accessibility correlated to planned capital improvement projects, department maintenance projects, and policies and procedures.
- Barriers to accessibility serving State and local government offices and facilities, transportation, transit stops, and places of public accommodation per [28 CFR Part 35 Subpart D § 35.150 \(d\) \(2\)](#).

Lower Priority

- Barriers for services not frequently used by the public.
- Barriers to accessibility in public right-of-way facilities slated for demolition or pending renovation.
- Barriers to accessibility where alternative locations have accessible facilities (i.e., situations wherein accommodations can be made to provide alternative equal access).

*It is assumed that validated grievances/complaints about barriers to accessibility be considered high priority for a response and resolution in accordance with the city's adopted ADA Grievance Procedure and other applicable established relevant policies.

**It is recommended that prioritization decisions be guided by the overarching principle that barriers identified and/or experienced by people within the ADA community are of higher priority for removal than other barriers. Public engagement efforts are therefore a critical component of the prioritization process.

C.2.2 Curb Ramp Barrier Removal Prioritization

Curb ramps were assigned a grade and condition based on a grading system developed by the Vermont Department of Transportation (VDOT) and amended for City of Aberdeen shown in **Table C-7**.

Table C-7. City of Aberdeen Curb Ramp Grading System

Grade	Ramp Width	Detectable Warning Surface	Material Condition	Compliance Status
A DARK GREEN	36" or greater	Truncated Dome Present in High Contrast Color	<u>Fair or Better Condition</u> Structurally compliant	Compliant
A GREEN	36" or greater	Truncated Dome Present in High Contrast Color	<u>Fair or Better Condition</u> Minor non-compliant slope, cracking, faulting (less than 1/4", or spalling)	Non-Compliant
B YELLOW	>36" to <48"	Exposed Aggregate Surface or Diamond Shape Stamp or Deteriorated Truncated Domes Present	<u>Poor Condition</u> Moderate cracking, faulting (1/4" - 3/4"), or moderate spalling	Non-Compliant
C ORANGE	36" or less	No detectable warning surface	<u>Very Poor Condition</u> Severe cracking, faulting (>3/4"), extensive spalling, or no landing	Non-Compliant
D RED	A curb ramp is needed but does not exist at the location to access an existing sidewalk where it crosses a curb.			Non-Compliant
D-BT PURPLE	A blended transition (5% or less running slope) is needed but does not exist at the location to access an existing sidewalk where it crosses a street.			Non-Compliant

Grade A ramps may be compliant or non-compliant:

- ADA-compliant grade A (Fair or Better) ramps meet all the grade A criteria listed.
- Non-compliant grade A (Fair or Better) ramps are 36" or greater, have a truncated dome present, but are technically non-compliant due to one or more minor non-compliant features.

A ramp only needs to satisfy one of the criteria for grades B, C, D, or D-BT to receive that grade:

- Ramps with a grade of B (Poor) are usable in their current form but are not ADA-compliant with 2010 ADA standards. These often have an outdated diamond aggregate stamp for detection, and/or have cross slopes that exceed allowances. These ramps are functional.
- Ramps with a grade of C (Very Poor) have multiple non-compliant features and are difficult to navigate.
- Ramps with a grade of D (Missing) or D-BT (Missing-Blended Transition) locations where a ramp does not exist but should exist.

Figure C-7 shows sample photos of grade A, B, C and D curb ramps in the City of Aberdeen.

Figure C-7. City of Aberdeen Graded Curb Ramps

*Top left: Non-compliant Grade A ramp. Top right: Non-compliant Grade B ramp.
Bottom left: Non-compliant Grade C ramp. Bottom right: Non-compliant Grade D missing ramp.*

For a table of the City of Aberdeen's curb ramps by grade and condition, see **Table C-8**.

Table C-8. City of Aberdeen Curb Ramps by Grade and Condition

Grade	Condition	2010 ADA Compliance	Count	Percentage
A	Fair or Better	Compliant	808	40%
A	Fair or Better	Not-Compliant	72	4%
B	Poor	Not-Compliant	89	4%
C	Very Poor	Not-Compliant	205	10%
D	Missing	Not-Compliant	742	37%
D-BT	Missing - Blended Transition	Not-Compliant	63	3%
N/A	Other	N/A	46	2%
TOTAL			2,025	100%

For a map showing curb ramps by grade and condition, see **Figure C-8**.

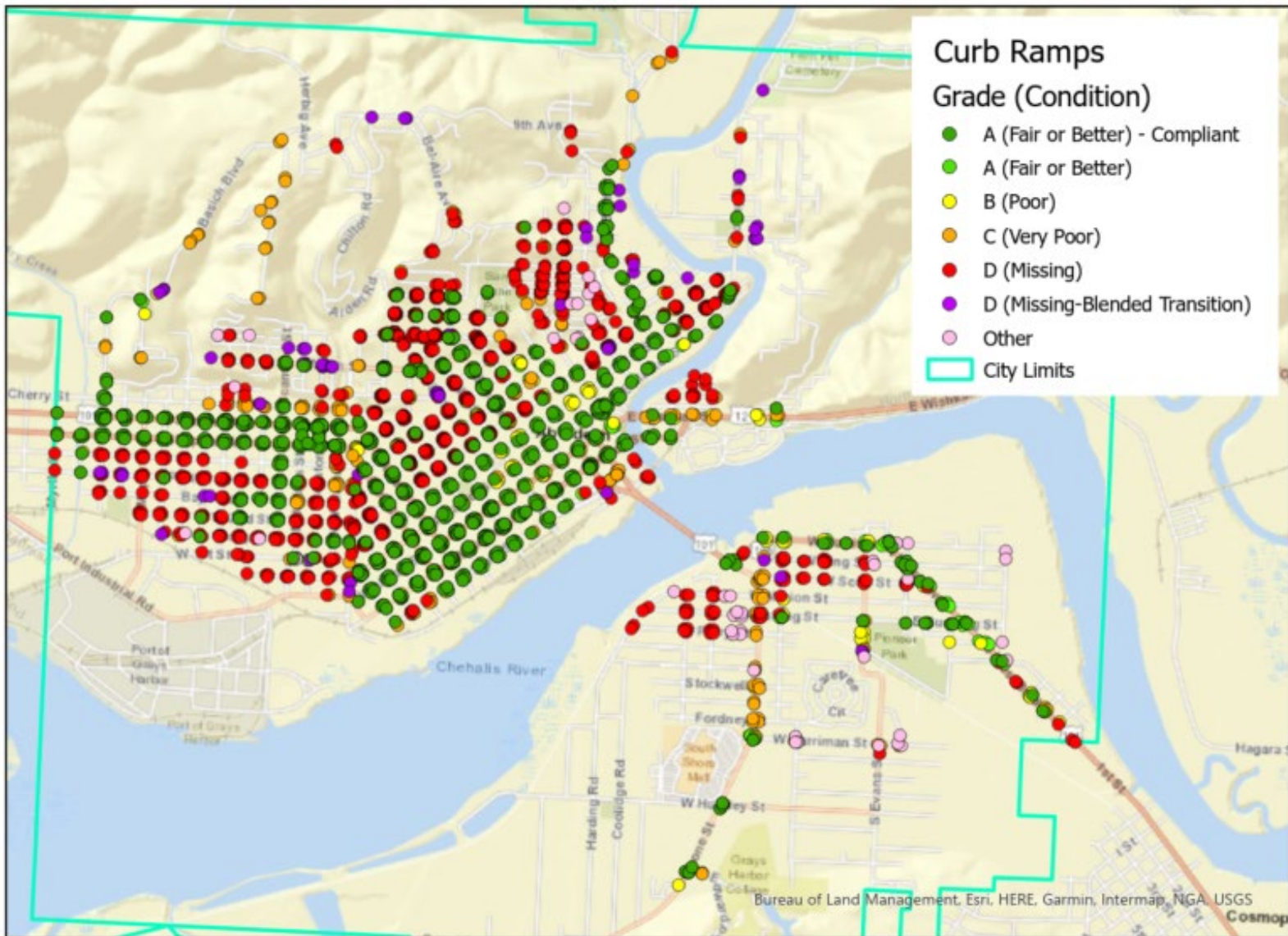
Curb Ramp Barrier Removal Recommendations

It is recommended the City prioritize curb ramp ADA barrier removal based on the general prioritization in **Section C.2.1** and the following curb ramp-specific criteria:

- Consider removing remaining barriers along arterial routes, transit routes, and residential streets serving public schools or public park facilities before other barriers.
- Consider installing ramps where they are currently missing (grades D and D-BT) before upgrading existing, non-compliant curb ramps (grades A, B, or C).

For curb ramp documentation, see **Appendix C1**.

Figure C-8. 2025 City of Aberdeen Curb Ramp Condition



C.2.3 Driveway Barrier Removal Prioritization

Steep cross slopes at driveways make pedestrian access routes difficult to navigate and are a useful metric for prioritizing driveway barriers.

27% of driveways received in-person field reviews including a cross slope measurement. Cross slopes exceeding 2.1%. are non-compliant. Of these measured driveways, 51 driveways have cross slopes of 5% or greater.

For the breakdown of driveways by cross slope, see **Table C-9**.

Table C-9. City of Aberdeen Driveways by Cross Slope

Cross Slope	2010 ADA Compliance	Count	Percentage
2.1% or less	Compliant	415	17%
2.1% or less	Non-Compliant	30	10%
More than 2.1% and less than 3%	Non-Compliant	84	
More than 3% and less than 5%	Non-Compliant	92	
More than 5% and less than 10%	Non-Compliant	50	
More than 10%	Non-Compliant	1	
No cross slope data available	Non-Compliant	1,797	73%
TOTAL		2,469	100%

Note: Only driveways that were candidates for ADA compliance received in-person field evaluations. The 73% of driveways that were assessed using Google® street view are predominantly located along sidewalk corridors in older residential areas of the City. Many of these driveways were deemed non-compliant due to cracking and/or surface deterioration. There are likely driveways in this cohort that also have non-compliant cross slopes.

For a map of driveways by cross slope, see **Figure C-9**.

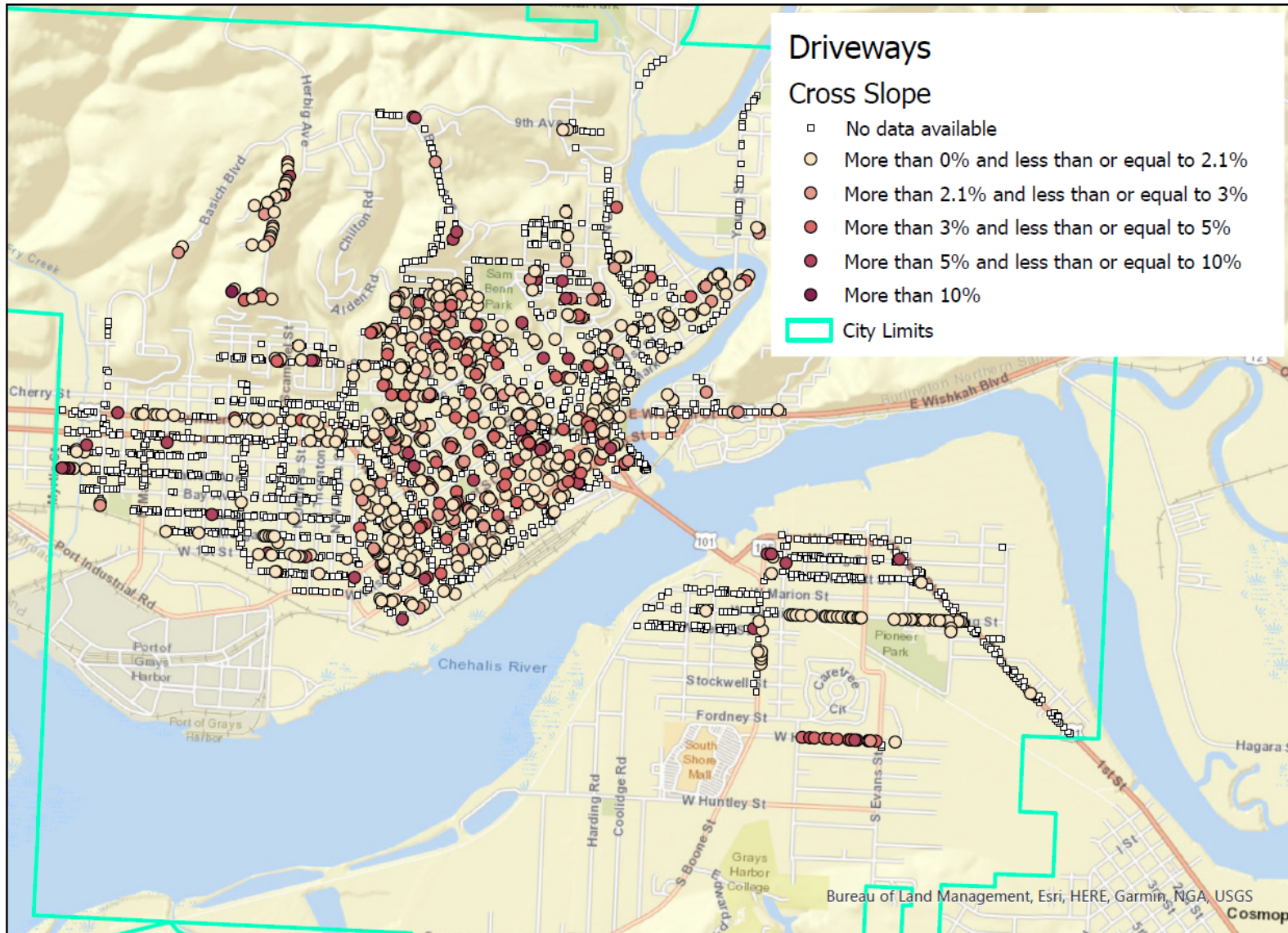
Driveway Barrier Removal Recommendations

It is recommended the City:

- Consider replacement of driveway barriers simultaneous with sidewalk barriers during Sidewalk Program projects. Residential property owners often have driveway access along their sidewalk frontage. See **Section C.2.4** below.
- Consider replacement of driveway barriers simultaneous with sidewalk barriers in City transportation improvement program (TIP) projects to ensure pedestrian access route corridors are accessible.
- Consider replacement of driveway barriers with steeper cross slopes before other driveway barriers when practical.

For driveway documentation, see **Appendix C2**.

Figure C-9. 2025 City of Aberdeen Driveways by Cross Slope



C.2.4 Sidewalk Barrier Removal Prioritization

Sidewalk Program

The City assists property owners through its Sidewalk Program. Property owners can file an application for the sidewalk along their frontage to be repaired by the City of Aberdeen. At a minimum, property owners must propose that the entirety of one side of sidewalk on their frontage be repaired. The cost to the property owner includes on the cost of materials (no labor costs). The City shall perform work within City right-of-way. Currently, there is a 7+ year waiting list.

For more information, visit <https://www.aberdeenwa.gov/219/Engineering-Division>.

Functionally Classified Arterial Routes

Sidewalks along functional classified arterial routes are higher priority due to their proximity to government offices and facilities, transportation, transit stops, and places of public accommodation including schools. Of the 233 sidewalk spot barriers, 179 (77%) are within 100 feet of an arterial route. Importantly, functionally classified routes are more likely to be eligible for grant funding. The City is encouraged to leverage the information within this Plan to highlight ADA barrier removal as a benefit in grant applications.

Sidewalk Condition Assessment

To complement the sidewalk spot inventory, aerial imagery and Google® street view data was assessed to establish a facility condition for all 78 miles of sidewalk segments (best condition, good condition, worst condition, or missing). “Best condition” sidewalks are most likely to be ADA compliant. “Good condition” sidewalks are older and may be ADA compliant. Sidewalks rated as “worst condition” are non-compliant due to deterioration, cracking, and/or upheaval. “Missing” sidewalks are non-compliant as they form a gap in a pedestrian access route that is a barrier to accessibility. See map in **Figure C-10**.

Sidewalk Obstacles

Of the 233 sidewalk spot barriers with obstacles, 172 (74%) had cross slopes of more than 2.1%. Surface deterioration, panel upheaval/cracking, and overgrown vegetation or debris were the other main obstacles along sidewalks. Severity of obstacles is another factor to consider for barrier removal.

Sidewalk Barrier Removal Recommendations

It is recommended the City:

- Consider prioritizing sidewalk barrier removal in residential areas through the City’s Sidewalk Program in coordination with property owners. Address driveway barriers simultaneously.
- Consider prioritizing sidewalk barriers along functionally classified arterial routes through planned transportation improvement projects. Address driveway barriers simultaneously.
- Consider prioritizing missing sidewalk segments or worse condition sidewalk barriers with excessive cross slopes, surface deterioration, and panel upheaval/cracking before other sidewalk barriers. Address driveway barriers simultaneously.
- Consider notifying City residents of their responsibility to keep sidewalks free of obstructions (including vegetation).

For a map of sidewalk barriers by priority, see **Figure C-11**.

Note: The prioritized sidewalk barriers identified in **Figure C-11** represent a sampling of the City’s total sidewalk inventory. It is assumed the City will continue monitoring sidewalk barriers through its annual Sidewalk Review activities. For sidewalk spot and sidewalk segment documentation, see **Appendix C3**.

Figure C-10. 2025 City of Aberdeen Sidewalks by Facility Condition

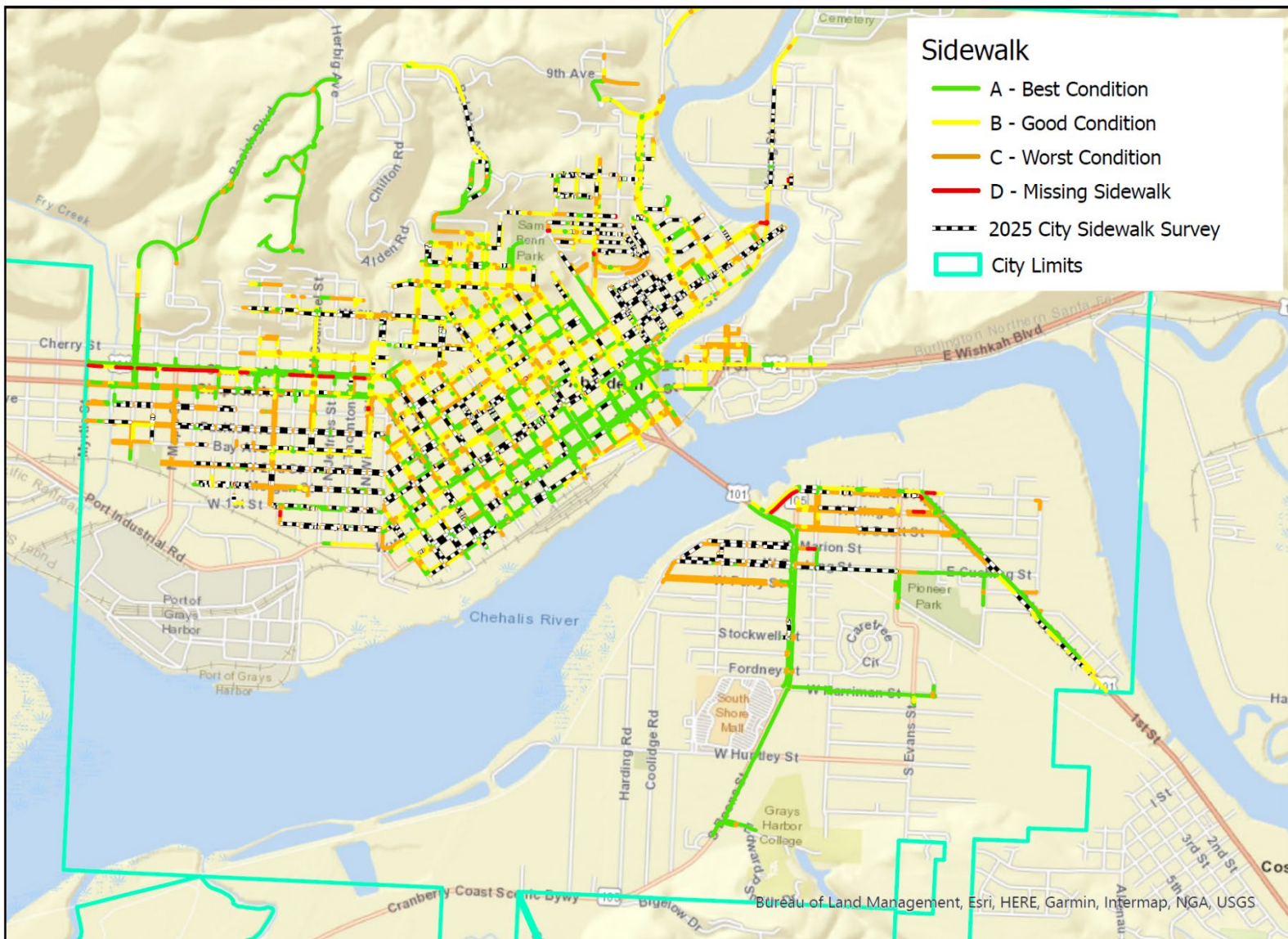
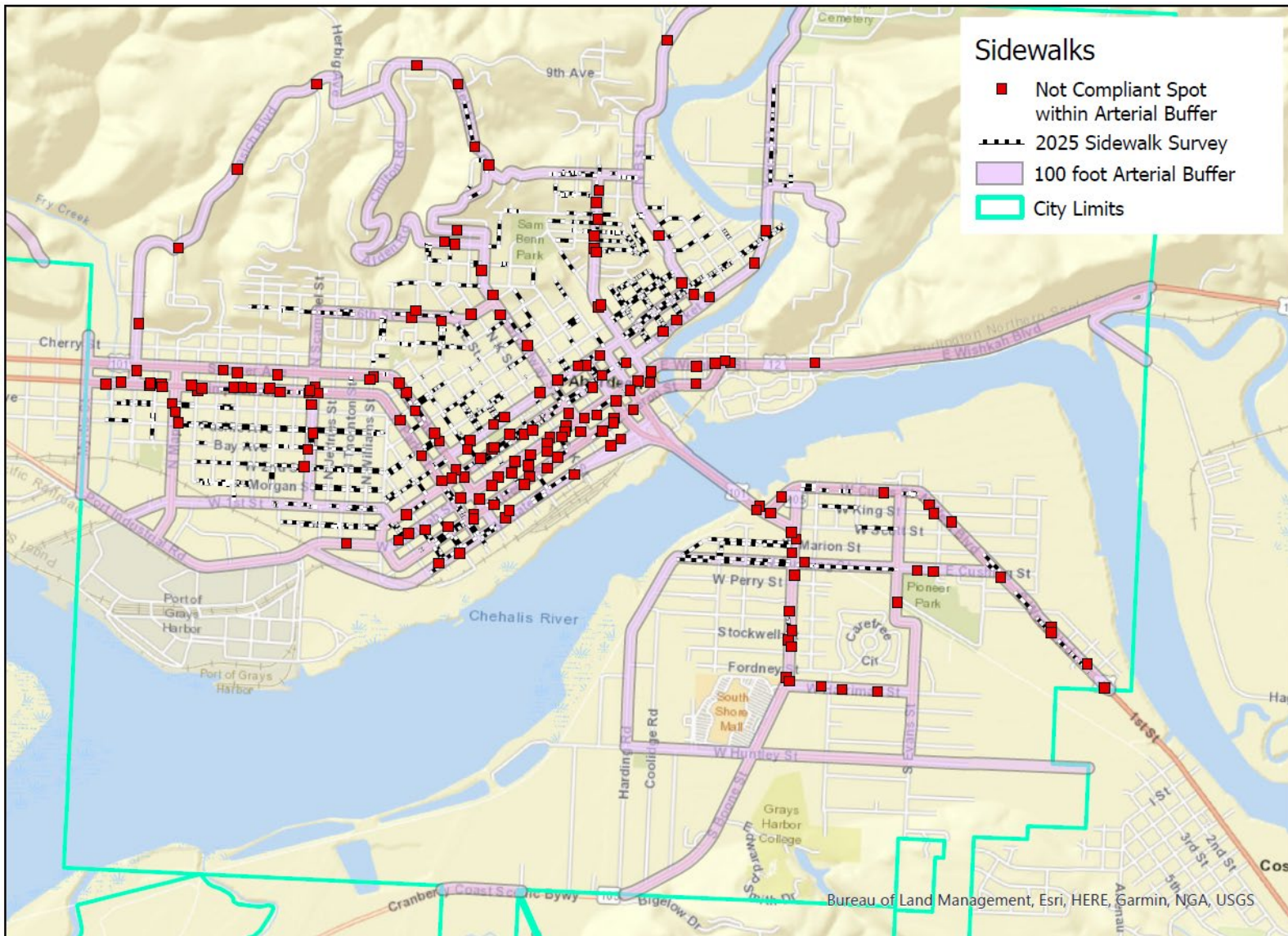


Figure C-11. 2025 City of Aberdeen Sidewalk Barriers by Priority



C.2.5 Paved Path Barrier Removal Prioritization

This Plan prioritizes the City's paved paths. The **Fry Creek Pedestrian Path** and **Basich Trail** are the most compliant paved paths with no observed ADA barriers along the routes. However, the **Basich Trail** pedestrian crossing at Lawrence St lacks detectable warning surfaces (DWS). The **Chehalis Riverfront Walkway** has some cross slopes exceeding 5% and surface deterioration on paved trail spurs that connect to street shoulders with gravel transitions. The **East Aberdeen Waterfront Trail** is the least accessible due to significant upheaval and vegetation barriers.

Paved Path Barrier Removal Recommendations

It is recommended the City:

- Consider installing detectable warning surfaces at the Lawrence St crossing of the Basich Trail and at dike access route crossings along the Chehalis Riverfront Walkway.
- Consider reconstructing the East Aberdeen Waterfront Trail to 8 feet wide per WSDOT shared use path minimum width (see WSDOT Design Manual Chapter 15.15.04(2)(c)).
- Consider addressing the steepest cross slope spot locations before other spot locations, when possible.
- Consider including paved paths in the city's yearly sidewalk survey to address upheaval, tripping hazards, and vegetation through grinding or other maintenance activities.

For paved path documentation, see **Appendix C4**.

C.2.6 APS Barrier Removal Prioritization at Traffic Signals

The City's two traffic signals at Broadway St/E First St and Broadway St/Market St have older passive activation for the pedestrian phase that does not require pushbuttons. These systems do not include audible locator tones or audible pedestrian phase notification, which makes them non-compliant. The City intends to upgrade these two traffic signals at a future date through the City's transportation improvement plan (TIP).

APS Barrier Removal Recommendations

It is recommended the City add these traffic signals to the City's TIP. New construction requires installation of compliant accessible pedestrian signals. See the City's Accessible Pedestrian Signal (APS) Policy in **Appendix B3**.

For APS documentation, see **Appendix C5**.

C.2.7 RRFB Pushbutton Barrier Removal Prioritization at Pedestrian Crossings

All of the City's four RRFB pushbuttons are compliant to MUTCD standards.

RRFB Barrier Removal Recommendations

There are no RRFB barriers in the City of Aberdeen as of October 2025.

Note: New construction requires installation of compliant accessible features for RRFB pushbuttons. See the City's Accessible Pedestrian Signal (APS) Policy that also addresses RRFBs in **Appendix B3**.

For RRFB documentation, see **Appendix C6**.

C.3 Public Right-of-Way Barrier Removal Cost Estimates

This chapter includes planning level construction cost estimates for each public right-of-way barrier type. These planning level cost estimates should be revised during final design activities. The chapter ends with a summary of the estimated total cost to remove all ADA barriers identified in this Plan.

The cost estimates are based upon current unit prices for public works contracts bid in 2025 and assume the work is bundled in a cost-effective manner to achieve economies of scale. Soft costs including design and construction management are based upon a percentage construction cost. Contingencies are shown and are based upon a percentage of construction cost. Exclusions are identified including utility relocation and right-of-way costs.

All cost estimates are provided in 2025 dollars. Costs may be lower for ADA barrier removal projects designed and/or constructed in-house by the City of Aberdeen Public Works department.

C.3.1 Curb Ramp Cost Estimate

A planning level estimated cost for fixing one curb ramp barrier is \$13,500. This cost estimate accounts for preliminary engineering/design and construction activities. See **Table C-10**.

In addition to design and construction of the curb ramp itself, additional costs may arise from addressing issues such as relocation of existing utilities, acquisition of new public right-of-way, and other roadway improvements such as curb bulbs and new enclosed drainage.

Removal of blended transition barriers may cost less if installation of a detectable warning surface along the full width of the blended transition is all that is necessary to bring it into compliance. Blended transitions are considered a type of curb ramp in the PROWAG.

The total cost estimate to remove all 1,171 curb ramp ADA barriers is approximately \$15.8 million.

C.3.2 Sidewalk Cost Estimate

Sidewalk construction cost estimates are provided per lineal foot for a 6-foot wide sidewalk including options with or without drainage. See **Table C-10**.

The total cost estimate to address an estimated 22.5 miles of sidewalk ADA barriers is approximately \$33.9 million (6-foot sidewalk without drainage) to \$54.6 million (6-foot wide sidewalk with drainage). This plan includes an averaged total cost estimate of \$44.6 million for planning purposes.

C.3.3 Driveway Cost Estimate

Driveway construction cost estimates are provided for three types of WSDOT-approved driveways suitable for ADA-accessible pedestrian access routes. The WSDOT Type 1 Driveway is recommended for use in the City of Aberdeen; Type 4 is not for use when Driveways are part of pedestrian access routes. See **Table C-10**. For WSDOT driveway types, see **Appendix C7**.

The total cost estimate to address all 2,054 driveway ADA barriers with WSDOT Type 1 driveways is approximately \$33.3 million.

Note: Some of the 2,054 driveway barriers are part of sidewalk segments that do not include a curb and gutter (i.e., the driveway is flush with the sidewalk). These include driveways in the residential areas of southeast Aberdeen along E Curtis St, E King St, E Scott, W Marion St, W Cushing St, and W Perry St.

Driveway barriers along non-curbed pedestrian access routes may cost less to remove, especially if part of sidewalk corridor projects.

C.3.4 Paved Path Cost Estimate

Asphalt paved path ADA barrier removal cost estimates are provided for 4-foot wide, 8-foot wide, 10-foot wide, and 12-foot wide options. See **Table C-10**.

The total cost estimate to address an estimated 0.49 miles of asphalt path ADA barriers through reconstruction to an 8-foot wide ADA compliant shared use path is approximately \$479,000.

Note: The minimum width of a pedestrian access route under the 2010 ADA Standards is 3 feet. The minimum width of a pedestrian access route under the 2023 PROWAG is 4 feet and is considered current best practice. WSDOT Design Manual Chapter 1515.04(2)(a) identifies a minimum operational width of 10 feet for shared use paths (SUPs) to accommodate two-way travel for all users. WSDOT Design Manual Chapter 1515.04(2)(c) states, in very rare circumstances, a reduced operational width as low as 8 feet may be used under certain conditions for shared use paths. See [WSDOT Design Manual](#) for more information.

C.3.5 Accessible Pedestrian Signal Installation Cost Estimate

APS construction cost estimates are provided for four installation scenarios: new traffic signal with APS, complete APS upgrade for existing four-leg signalized intersection, relocated pushbuttons only, and pushbuttons only. See **Table C-10**.

Since the City anticipates replacing the traffic signals at the two non-compliant intersections, the total cost estimate to address APS at both non-compliant signalized intersections through full traffic signal reconstruction is \$1,000,000.

C.3.6 Rectangular Rapid Flashing Beacon Installation Cost Estimate

The City does not have any existing RRFB barriers as of October 2025. RRFB construction cost estimates are provided for three different installation scenarios: complete new RRFB crossing, relocated pushbuttons only, and pushbuttons only. Note: The cost for potential required curb ramp replacements is not included. See **Table C-10**.

The total construction cost estimate to install a complete new RRFB crossing is \$75,000.

Note: The City does not have any existing RRFB barriers.

C.3.7 PROW Barrier Removal Cost Estimate Summary

Table C-10 shows barrier removal cost estimates for each barrier type and removal option in 2025 dollars.

Table C-10. City of Aberdeen PROW Barrier Removal Cost Estimate by ADA Feature Type

Barrier Type	ADA Feature	Cost Estimate (\$2025)
Curb Ramp		\$13,500
Driveway*	Type 1 Driveway Interface per each (recommended for Aberdeen)	\$16,200
	Type 2 Driveway Interface per each	\$19,200
	Type 3 Driveway Interface per each	\$16,900
Sidewalk	6-foot wide sidewalk without drainage per lineal foot	\$285
	6-foot wide sidewalk with drainage per lineal foot	\$460
APS	New traffic signal with APS.	\$500,000
	APS for existing four-leg signalized intersection including eight pedestrian countdown signal heads, eight pedestrian pushbutton posts and eight vibro-tactile APS pushbuttons.	\$100,000
	ADA compliant pushbutton installation requiring relocation and pushbutton post.	\$5,000
	ADA compliant pushbutton installation requiring no relocation.	\$1,000
Paved Path**	4-foot wide paved pedestrian path without drainage per linear foot	\$135
	8-foot wide paved shared use path without drainage per linear foot	\$185
	10-foot wide paved shared use path without drainage per linear foot	\$180
	12-foot wide paved shared use path without drainage per linear foot	\$220
RRFB	Complete RRFB crossing with poles, signs, flashing beacons, and ADA compliant pushbuttons.	\$75,000
	ADA compliant pushbutton installation requiring relocation and pushbutton post.	\$5,000
	ADA compliant pushbutton installation not requiring relocation.	\$1,000

*For WSDOT Driveway types, see **Appendix C7**.

**PROWAG minimum width for pedestrian access route is 4 feet. WSDOT minimum width for shared use path (SUP) is 8 feet.

For more detailed information on cost estimates, see **Appendix C7**.

Table C-11 shows the total cost estimate for removing all known public right-of-way barriers in the City of Aberdeen.

Table C-11. City of Aberdeen PROW Barrier Removal Cost Estimate Summary

Barrier Type	Count of Non-Compliant Features	Total Cost Estimate (\$2025)
Curb Ramp	1,171 curb ramps at \$13,500 per curb ramp location	\$15,808,500
Driveway*	2,054 at \$16,200 per driveway location (WSDOT Driveway Type 1 recommended for replacement)	\$33,274,800
Sidewalk	22.50 miles of 6-foot wide sidewalk at \$375 per linear foot (average of with and without drainage options)	\$44,550,000
Paved Path**	0.49 miles of 8 ft-wide SUP at \$185 per linear foot without drainage	\$479,000
APS	Full APS (\$500,000 each) x 2 two signalized intersections	\$1,000,000
RRFB	No barriers as of October 2025	\$0
TOTAL		\$95,112,300

*For WSDOT Driveway types, see **Appendix C7**.

** This Plan includes a total cost estimate for installation of 8-foot wide shared use path (SUP). Total paved path cost estimate may be less if 4-foot wide paved path is constructed to meet 4-foot wide pedestrian access route PROWAG requirement.

C.4 Public Right-of-Way Barrier Removal Financial Plan and Schedule

ADA barrier removal is a long-term, iterative process, and the City will use this Plan to make incremental progress towards an ADA barrier-free public right-of-way in the City of Aberdeen. The cost of ADA barrier removal may seem daunting, but the City intends to make progress over time.

This chapter establishes the City of Aberdeen's financial plan and schedule for removing ADA barriers in the City's public right-of-way. The City invests in its public right-of-way facilities through new construction and improvement projects. These investments can remove existing ADA barriers where antiquated or deficient facilities are present, as well as expand accessibility for all ages and abilities through new ADA-accessible infrastructure where none previously existed.

The chapter begins by summarizing the City's recent investments that removed ADA barriers in the public right-of-way through 2024. The chapter concludes with a look at current and future planned actions to remove ADA barriers as well as expand ADA accessibility.

The City of Aberdeen will work within the limits of the City's existing funding for its **ADA Transition Plan Program** and **Transportation Improvement Program (TIP)** projects for the bulk of ADA Transition Plan barrier removal efforts.

City of Aberdeen funding sources may include up to \$100,000 per year from the Public Works budget. Transportation Benefit District funds, if available, may be used to leverage state and federal grant funding listed below to incorporate ADA barrier removal into other programmed projects.

State and federal grant funding may provide additional funding for ADA barrier removal, such as Washington State's Transportation Improvement Board (TIB) Urban Arterial Program, Sidewalk Program, Transportation Alternatives Program, and Federal Surface Transportation Program funds

The implementation framework for barrier removal focuses on the **Short-Term Horizon (2025-2030)** as outlined in the City's 6-Year TIP. Remaining barriers are planned to be addressed in the **Long-Term Horizon (2031 onward)** time frame and at future updates to this Plan.

The ADA barrier removal financial plan and schedule identified below is subject to the City's annual budget process and fluctuations in funding capital.



New ADA-compliant curb ramps, sidewalk, and driveways on south side of westbound US 12 west of Jeffries St.

C.4.1 Recent Public Right-of-Way Facilities Investments

The City of Aberdeen has made significant progress in recent years to bring public right-of-way facilities into ADA compliance. In 2013-2017, the City installed over 200 curb ramps as part of its US 101 Pedestrian Safety and Citywide ADA Improvement projects. These projects removed ADA curb ramp barriers along Oak St, Scammel St, Broadway St, First St, Sixth St, Market St, Wishkah St, Heron St, and State St. Curb ramp barrier removal is also part of the City's ongoing pavement maintenance and preservation projects.

2020-2024 City Projects with ADA Improvements

The following notable City projects between 2020 and 2024 have made further ADA improvements. (These projects are included in the ADA Improvements Map in **Figure C-12** below).

Grays Harbor College Neighborhood Connection Project

This project added approximately 2,750 linear feet of sidewalk and nine curb ramps from 250' south of Edward P Smith Dr to Harriman St. This project was completed in Q4 2020.

Stevens Elementary Pedestrian Improvement Project

This project added approximately 970 linear feet of sidewalk and seven curb ramps on E Cushing St between S Tilden St and S West Blvd (US101) and 220 linear feet of sidewalk on S Farragut St between E Cushing St and Stevens Elementary School. This project was completed in Q4 2021.



New ADA-compliant curb ramps, sidewalk, and driveways near Stevens Elementary School.

W Aberdeen Safety Improvement Project

This project added 15 curb ramps, including seven new curb ramps on Bay Avenue and eight new curb ramps on W Second St. This project was completed in Q1 2022.

F Street/Market Street Roundabout Project

This project added approximately 1,000 linear feet of sidewalk and 15 new curb ramps on F Street, Market Street, and Fuller Way. This project was completed in Q3 2022.



New ADA-compliant curb ramps, sidewalk, and driveways at F Street/Market Street roundabout.

A Street and I Street Reconstruction Project

This project added approximately 600 linear feet of sidewalk and five curb ramps on A St between E First St and E Second St. This project was completed in Q3 2023.

Fry Creek Restoration Project – Phase II

Phase II improvements included approximately 300 feet of a new ADA-compliant pedestrian path connecting a new ramp at Pacific Ave to Aberdeen Ave along the Ash St corridor. The serpentine alignment of this path splits into two legs at Aberdeen Ave. One leg connects to a second new ADA ramp serving the south side of Aberdeen Ave. The other leg is intended to connect to future development immediately to the north. Phase II work was completed in Q4 2024.



New ADA-compliant path next to Fry Creek near Ash St between Pacific Ave and Aberdeen Ave.

Sidewalk Program

The City's annual sidewalk program has completed more than 4,000 linear feet of sidewalk barrier removal projects between 2023 and 2025 to replace deteriorated sidewalks throughout Aberdeen.



Driveway and sidewalk replacement on Terrace Alley before (left) and after (right).



Driveway and sidewalk replacement at 509 W Curtis St before (left) and after (right).

C.4.2 Public Right-of-Way ADA Barrier Removal Planned Actions

The City anticipates being able to remove 8-10 curb ramp barriers per year using the City's in-house engineering and construction staff. These and other potential barrier removals could be funded through the City's Transportation Benefit District, Capital Improvement Program, or other funding sources.

ADA Transition Plan Program

For 2025-2028, the City's ADA Transition Plan Program has \$25,000 budgeted annually for ADA barrier removal at various locations, totaling \$100,000.

Annual Sidewalk Program

The City's Sidewalk Program was created by the Public Works Department in 2015 in an effort to increase the accessibility of sidewalks. The City has been able to address increasing linear feet of sidewalk each year of the program since 2023. For more information, visit:

<https://www.aberdeenwa.gov/219/Engineering-Division>.

2025-2030 Transportation Improvement Program

The city's 2025-2030 Transportation Improvement Program (TIP) includes projects that will remove public right-of-way ADA barriers through reconstruction projects where existing ADA barriers are replaced with ADA-compliant facilities. Some TIP projects involve construction of new ADA-compliant facilities where none previously existed. These projects expand accessibility, but do not remove existing barriers documented in this Plan.

Market Street Sidewalk Improvements (constructed summer 2025): Fixing approximately 600 linear feet of non-compliant sidewalk and three non-compliant ramps on Market St between I St and L St.

Sumner Avenue Sidewalk Improvements (constructed summer 2025): Adding approximately 2,600 linear feet of sidewalk to address existing sidewalk barriers, 23 new curb ramps, and 13 new driveways on the south side of Sumner Ave from Myrtle St to Williams St.

Systemic Pedestrian Safety Improvements (constructed summer 2025):

- Adding eight curb ramps at First St and G Street intersection (fixes four non-compliant ramps and adds four new ramps).
- Adding eight curb ramps at First St and Washington St (fixes two non-compliant ramps and adds six new ramps).
- Adding one curb ramp on SE corner of Market St and Jefferson St (fixes one non-compliant ramp).
- Adding two RRFB crossings at Market & M Street (north-south crossings).

US 101 Safety Improvement Project (construction anticipated Spring – Fall 2026): This project will fix some existing sidewalk barriers and add or replace deficient curb ramps and driveways along 1.44 miles of US 101 Highway from the south end of the Chehalis River Bridge to Cosmopolis.

Other TIP projects scheduled for 2027 and onward are pending final design. Anticipated ADA barrier removal and new ADA infrastructure included in these projects are listed in **Table C-12** below.

Private Development Frontage Improvements

Private development projects with frontage improvements provide another opportunity for ADA barrier removal. The City will document ADA barrier removal by private developers at future Plan updates.

The anticipated ADA barrier removal and new ADA-compliant infrastructure projects are listed in **Table C-12** and in **Figures C-12 and C-13**. For more information, see the City of Aberdeen's most recent budget on the City's webpage at <https://www.aberdeenwa.gov/177/Finance>.

Table C-12. City of Aberdeen ADA Barrier Removal and New ADA Infrastructure Schedule

Project	Year	ADA Barrier Removal*	New ADA Infrastructure**	Map Reference
ADA Transition Plan	2025-2028	Varies	N/A	Determined annually
Sidewalk Program	Annually	Varies	Varies	Determined annually
Market Street Sidewalk Improvements	2025	600 LF of fixed sidewalk 3 fixed curb ramps	N/A	See Figure C-12
Sumner Avenue Sidewalk Improvements	2025	2,600 LF of fixed sidewalk to fill existing gaps	23 new curb ramps 13 new driveways	See Figure C-12
Systemic Pedestrian Safety Improvements	2025	7 fixed ramps	10 new ramps 1 new RRFB crossing	See Figure C-12
RRFB at Jefferson St/Heron St (Private Development)	2025	N/A	1 new RRFB crossing	See Figure C-12
US 101 Safety Improvement Project	2026	2,000 LF of fixed sidewalk 25 fixed ramps 3 fixed driveways	1,000 LF of new sidewalk 26 new ramps 9 new driveways	See Figure C-13
Aberdeen US12 Highway-Rail Separation Project	2026-2028	1,200 LF of fixed sidewalk 22 fixed curb ramps		
Wishkah St adjacent to Walmart	2025-2027	5 fixed driveways	N/A	See Figure C-13
Evans Street Sidewalk Improvements from MacFarlane St to Huntley St	2027	2 fixed ramps 2 fixed driveways	2,400 LF of new sidewalk 6 new ramps 3 new driveways	See Figure C-13
F Street Reconstruction from E Heron St to 416 E Wishkah Rd	2027	250 LF of fixed sidewalk 3 fixed ramps 3 fixed driveways	N/A	See Figure C-13
B Street Sidewalk Extension from Stewart Blvd to Wishkah Rd	2028	3 fixed ramps	1,400 LF of new sidewalk	See Figure C-13
Broadway Street Corridor Improvements from Heron St to First Street	2030	500 LF of fixed sidewalk 5 fixed ramps 5 fixed driveways Planning discussions underway	N/A	See Figure C-13
Aberdeen-Cosmopolis Connector Project Huntley St from Farragut St to Third St	2030	Planning discussions underway	2,750 LF of new sidewalk 2 new curb ramps	See Figure C-13
Future Pedestrian Crossing Improvements at Sumner & Haight and Simpson & Haight	2026-2030	Planning discussions TBD	2 Improved crosswalks	See Figure C-13

*Curb ramp and sidewalk length may change during Design process. Length or number of pedestrian facilities subject to final inspection. **New infrastructure shows expansion of accessible facilities where no barriers currently exist. Unfunded projects included on the TIP may change in the future.

Figure C-12. City of Aberdeen Recent ADA Improvements (2020-2025)

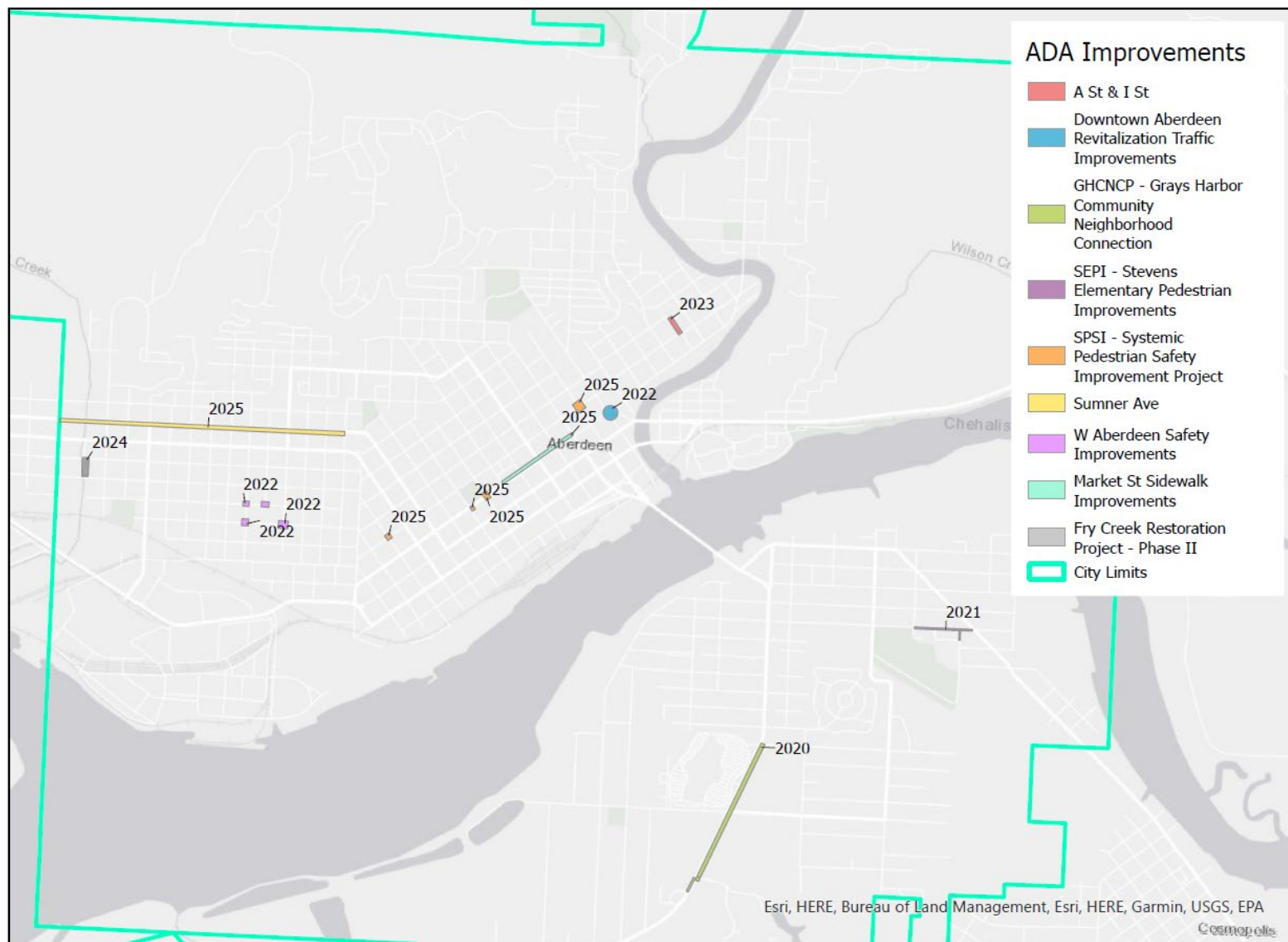
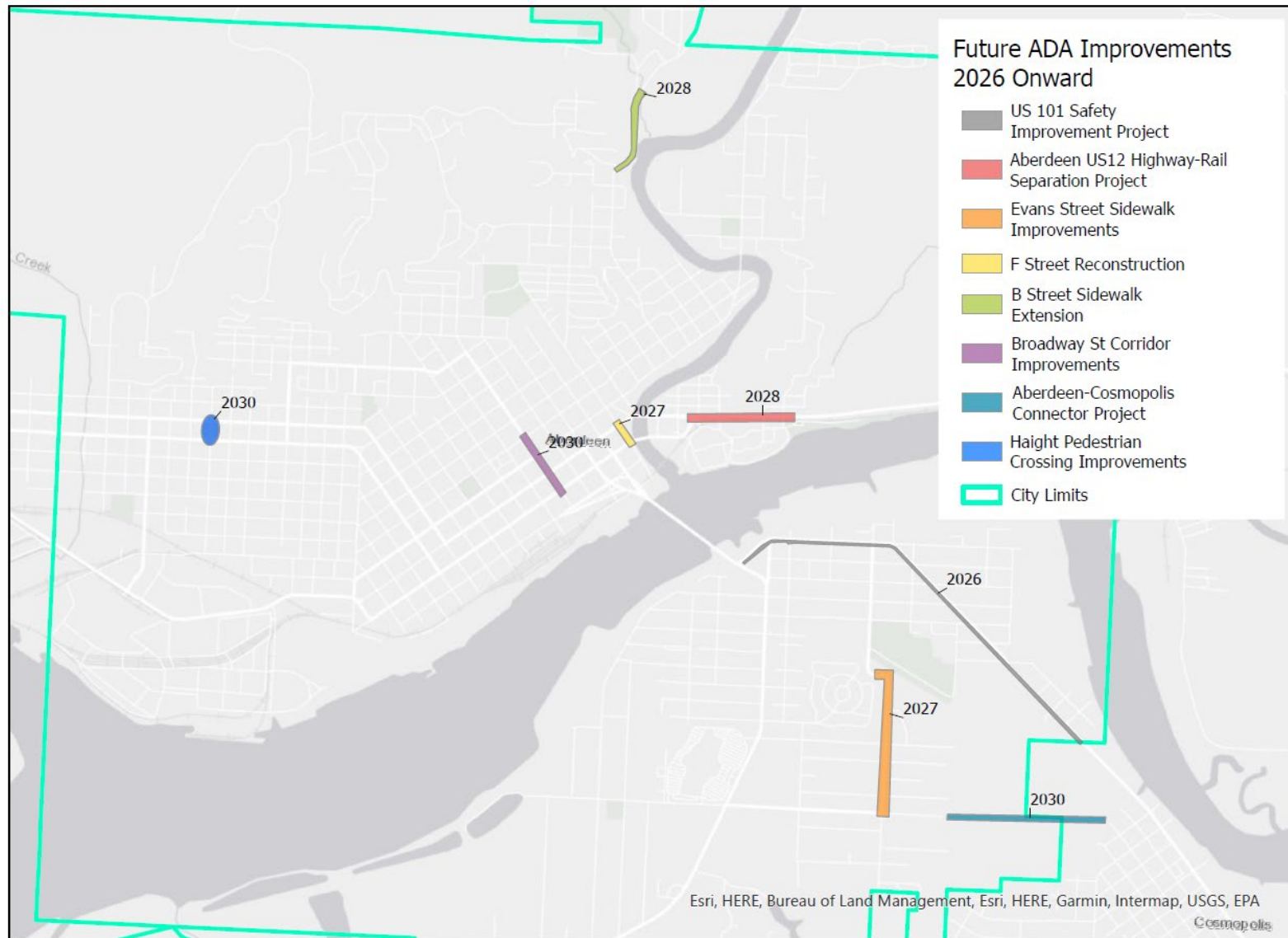


Figure C-13. City of Aberdeen Anticipated Future ADA Improvements (2026 Onward)



C.4.4 Safe Harbor

Agencies have the option to re-evaluate public right-of-way facilities for Safe-Harbor and accessibility as part of the survey/design phase of a specific ADA barrier removal project.

The 2010 ADA Standards allow for a Safe Harbor provision. Elements that have not been altered in existing facilities on or after March 15, 2012, and that comply with the corresponding technical and scoping specifications for those elements in either the 1991 Standards or in the Uniform Federal Accessibility Standards (UFAS), Appendix A to 41 CFR part 101-19.6 (July 1, 2002 ed.), 49 FR 31528, app. A (Aug. 7, 1984) are not required to be modified in order to comply with the requirements set forth in the 2010 Standards. See **Section A.2.2**.

Since March 15, 2012, new construction and alterations must meet current 2010 ADA Standards at a minimum (see **Section A.2.3**).

While the 2010 ADA Standards are the federal enforceable standard for new construction and alterations, this Plan recommends that new facilities be designed and constructed according to the Public Right-of-Way Accessibility Guidelines (PROWAG) guidelines.

C.4.5 Documentation for Structural Impracticability and Maximum Extent Feasible

Some non-compliant facilities that do not fully meet current 2010 ADA Standards may qualify for maximum extent feasible (MEF) status if site conditions make meeting the standard infeasible. The inventory work completed in 2025 did not include preparation of MEF documentation.

WSDOT LAG Manual Chapter 29 (December 2024) includes a section on documentation for structural impracticability and MEF:

While ADA/Section 504 regulations do not require documentation of the application of structural impracticability nor maximum extent feasible, both FHWA and the U.S. Access Board recommend that these instances be documented so the agency can support its decisions if challenged at a later date. The documentation of these instances should reveal the standard of care that guided engineering judgments. While careful documentation will not protect an agency against complaint, evidence of the considerations that led to the specific project solution may be persuasive in discussions with stakeholders or in court.

As described in the Design Manual, WSDOT has a documentation procedure for applications of maximum extent feasible in alteration projects on state routes. If a local agency applies maximum extent feasible to a pedestrian facility located on a state route, it is WSDOT's expectation that the agency follows the WSDOT documentation procedure described in the Design Manual. The completed documentation should be contained in local agency project files to document the agencies design efforts in complying with the ADA/Section 504 requirements.

If a local agency finds the need to apply maximum extent feasible to a pedestrian facility that is not located on a state route, the WSDOT documentation procedure does not need to be followed. However, it is highly recommended that the agency develops its own documentation protocol for such situations that is consistent with the FHWA and U.S. Access Board recommendations.

WSDOT Design Manual Chapter 1510.030(2) Alteration Projects (September 2024, pages 1510-5 through 1510-7) includes a section on MEF documentation:

Any project that alters or adds pedestrian facilities in an existing developed public right-of-way, and affects or could affect pedestrian access, circulation, or usability, is classified as an alteration project.

Alteration projects include, but are not limited to, renovation; rehabilitation; reconstruction; historic restoration; resurfacing of circulation paths or vehicular ways; and changes or rearrangement of structural parts or elements of a facility. Where existing elements or spaces are altered, each altered element or space shall comply with the applicable accessibility requirements to the maximum extent feasible. The scope of a project may need to be expanded to capture all required accessibility revisions; this may also require additional right-of-way purchase or temporary construction easements to accomplish.

The following are some examples of project types that are classified as alteration projects and can potentially trigger a variety of ADA requirements:

- *HMA overlay or inlay*
- *Traffic signal installation or retrofit*
- *Roadway widening*
- *Realignment of a roadway (vertical or horizontal)*
- *Sidewalk improvements*
- *PCCP panel repair/replacement*
- *Bridge replacement*
- *Raised channelization*

The following are not considered alterations:

- *Spot pavement repair*
- *Liquid-asphalt sealing, chip seal (BST), or crack sealing*
- *Lane restriping that does not alter the usability of the shoulder*

If there is uncertainty as to whether a project meets the definition of an alteration project, consult with the Regional ADA Liaison.

The following apply to alteration projects:

- *All new pedestrian facilities included in an alteration project must meet applicable accessibility requirements to the maximum extent feasible.*
- *Existing right-of-way limits may not be used as a justification for limiting the extents of meeting accessibility requirements; however, existing developed features such as buildings or other infrastructure may be used as a justification.*
- *All existing pedestrian facilities disturbed by construction of an alteration project must be replaced. The replacement facilities must meet applicable accessibility requirements to the maximum extent feasible.*
- *An alteration project shall not decrease or have the effect of decreasing the accessibility of a pedestrian facility or an accessible connection to an adjacent building or site below the ADA accessibility requirements in effect at the time of the alteration.*
- *Within the construction impact zone of an alteration project, any existing connection from a pedestrian access route to a crosswalk (marked or unmarked) that is missing a required curb ramp must have a curb ramp installed that meets applicable accessibility requirements to the maximum extent feasible. (See Section 1510.08(2) for curb ramp accessibility criteria.)*

- *A crosswalk served by a curb ramp must also have an existing curb ramp in place on the receiving end unless there is no curb or sidewalk on that end of the crosswalk (RCW 35.68.075). If there is no existing curb ramp in place on the receiving end, an accessible curb ramp must be constructed as part of the project. This requirement must be met regardless of whether the receiving end of the crosswalk is located within the project's limits or initial scope of work.*
- *Within the construction impact zone of an alteration project, evaluate all existing curb ramps to determine whether curb ramp design elements meet the accessibility criteria. (See Section 1510.08(2) for curb ramp accessibility criteria.) Modify existing curb ramps that do not meet the accessibility criteria to meet applicable accessibility requirements to the maximum extent feasible within the entire footprint of the curb ramp. Transitional sections of sidewalk to match the newly-compliant ADA ramp to an existing non-compliant sidewalk should be located beyond the limits of the reconstructed ADA ramp. Transitional sections are not permitted within ADA ramp limits.*
- *Within the construction impact zone of an alteration project that includes hot mix asphalt overlay (or inlay) of an existing roadway and does not include reconstruction, realignment, or widening of the roadway, evaluate all existing marked and unmarked crosswalks. (See Section 1510.09(2) for crosswalk accessibility criteria.) If it is not possible to meet the applicable accessibility requirements for crosswalks, document this in the DDP per the guidance below.*
- *Within the construction impact zone of an alteration project that includes reconstruction, realignment, or widening of the roadway, evaluate all existing crosswalks (marked or unmarked) to determine whether crosswalk design elements meet the accessibility criteria. (See Section 1510.09(2) for crosswalk accessibility criteria.) Modify crosswalk slopes to meet the applicable accessibility requirements to the maximum extent feasible.*

It may not always be possible to fully meet the applicable accessibility requirements during alterations of existing facilities.

If such a situation is encountered, consult with the Regional ADA Liaison to develop a workable solution to meet the accessibility requirements to the maximum extent feasible. Cost or lack of existing right-of-way are not to be used as a justification for not meeting the accessibility criteria. Physical terrain or site conditions that would require structural impacts, environmental impacts, or unacceptable impacts to the community in order to achieve full compliance with the accessibility criteria are some of the factors that can be used to determine that the maximum extent feasible is achieved.

If it is determined to be technically infeasible to meet the accessibility criteria for an element, document the decision via a stamped and signed Maximum Extent Feasible (MEF) document. The MEF document will be reviewed by the appropriate Assistant State Design Engineer (ASDE) and the Headquarters (HQ) ADA Compliance Manager. If acceptable, the MEF document will be approved and included in the DDP.

For access to the WSDOT Design Manual, visit <https://wsdot.wa.gov/engineering-standards/all-manuals-and-standards/manuals/design-manual>.

For MEF documentation forms for Aberdeen facilities, see **Appendix C8**.

D. Public Engagement

The city developed the following public engagement strategy to inform interested members of the public of the undertaking of this Plan and to invite participation in the process, especially those local community members who have disabilities or are involved with organizations that provides services to persons with disabilities. This strategy included digital announcements, direct stakeholder engagement emails, an online public survey, and an ADA Public Workshop for the public to report ADA barriers and comment on the Draft Plan. The city considered the public feedback it received when prioritizing and selecting ADA barrier for removal. For documentation of public engagement, see **Appendix D**.

D.1. Project Webpage

The project webpage content was launched in March 2025 and includes information related to the project scope, schedule, public engagement opportunities, city staff contacts, other ADA resources, documents, and recent accomplishments.

Links to the screen-reader friendly Esri Survey123® online survey and ADA Public Workshop in-person and virtual meeting information went live on May 14, 2025. The draft plan was posted for public comment between October 29 and November 12, 2025. The final plan will be posted on this webpage for public access. The city's PROW ADA Transition Plan project webpage is available at:

<https://www.aberdeenwa.gov/607/ADA-Transition-plan>

D.2 Web-Based Publications

The following web-based publications promoted the project, online survey, public workshop, and Draft Plan public comment opportunities:

- City of Aberdeen Calendar on May 15
- City of Aberdeen Facebook page (May 15, May 30, June 2, June 12, June 13, October 29, November 5, and November 12)
- Online *The Daily World* digital news publication on May 20 and October 24
- *Aberdeen Matters* Senior Center Newsletter September/October 2025 publication

D.3 Direct Engagement with Local ADA Community Organizations

City staff contacted the following organizations via direct e-mail in May 2025, to seek out interest in the online survey and public comment opportunities. A Save-the-Date flyer and social media language was provided to these organizations as resources to share on their social media and communication platforms:

- Aberdeen School District
- Arc of Grays Harbor
- Aberdeen Branch of Timberland Regional Library
- Coastal Community Action Program
- Grays Harbor College Accessibility Services
- Greater Grays Harbor, Inc
- Washington State Department of Social and Health Services (DSHS) staff shared with Developmental Disabilities clients

For the promotional materials provided to the contacted entities, see **Appendix D**.

D.4 Online ADA Barrier Survey

A 12-question survey on the Esri Survey123® platform was open between May 14 through June 15, 2025. Respondents had the option to mark barrier locations on a map, submit photos, and rank barriers for removal.

D.4.1 Survey Ranking Question Feedback

Of the ten (10) survey responses, fifty percent of respondents reported they were either very familiar or extremely with ADA barriers in the public right-of-way.

The **top three most-wanted barrier types for removal** were missing curb ramps, sidewalk cracks/bumps, and overgrown vegetation in path of travel.

The **top three most-preferred places for barrier removal** were grocery stores/retail shopping centers, local government buildings/post offices, and transit centers/stops/routes.

D.4.2 Narrative Survey Feedback

Narrative feedback from the surveys included topics related to the public right-of-way as well as other topics.

- **Burleigh Ave:**
 - **NE corner on F St:** There is a stretch of missing crosswalk. This is the only side with a crosswalk and the respondent said it is frequently used to access the park by parents pushing strollers, people in wheelchairs, and the elderly.” (This respondent also attended the ADA Public Workshop and mentioned the same intersection.)
 - **412 Burleigh Ave:** “Where will funding come from? How will the order of upgrades be determined? Will this be covered by grant money or incorporated in already overpriced fees and taxes.”
- **N L St and W 2nd St:** “Cracked sidewalks and no ramps. ADA compliance also aids people pushing strollers with children. Many doors do not automatically open.”
- **N Clark St and W Scott St:** “No ramp after sidewalk, just grass.”
- **Access to Restrooms:**
 - “Another form of ADA accommodation that is severely lacking is easy access to restrooms. As someone with Crohn's Disease I have been appalled at the lack of bathroom access throughout town. Having to track someone down for a key or code or just being flat out turned away despite Washington state supposedly upholding Megan's Law - it has been frustrating to say the least. When I have a flare I am forced to stay home because I can't rely on any bathrooms to be open or accessible in town (many not at all, some only after an unreasonable wait time which defeats the purpose and isn't an accommodation at all). I would like city wide ordinance for downtown businesses and gas and grocery stores ideally but even if the parks bathrooms weren't locked and library bathroom didn't make you wait for others and wait for the librarian to have time to talk and look for the key - it would help. Additionally, more benches to make the city more walkable for those that need occasional rest.”
 - “The restrooms, or lack there of. Winter there's only port-a-potties, which are not big enough for me to go into as there aren't any disability friendly port-a-potties.”
- **S Evans St:** “My adult autistic daughter and her service animal dog have to walk in the street because there are no sidewalks. Additionally, there are no street markings. Meaning there is no

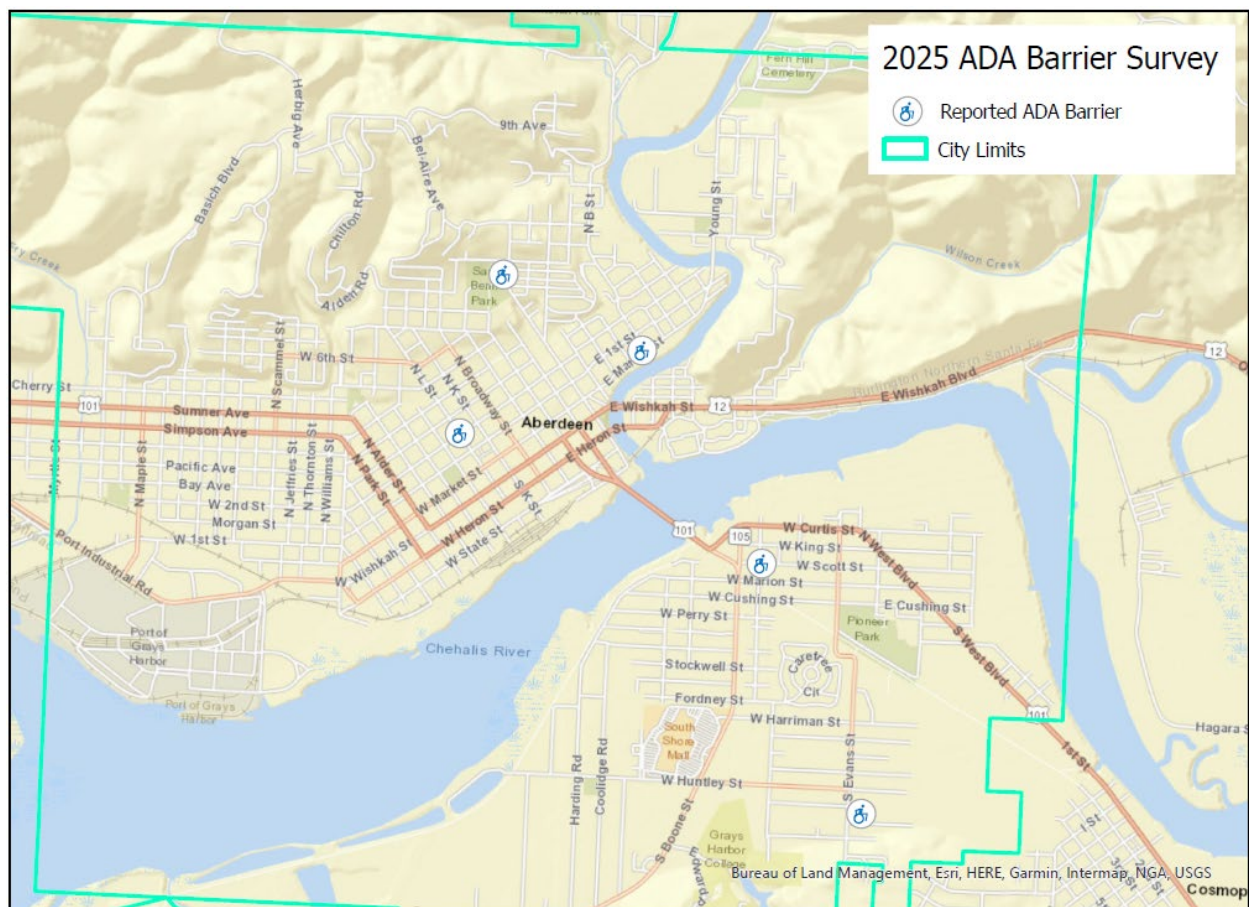
designated shoulder. Right now, her natural parents provide all of her transportation however, in the future, the expectation is that she will be taking the bus which is down the street with no sidewalk and no street markings.” (This respondent also attended the ADA Public Workshop and mentioned the same barriers and locations.)

- **E Market and B St:** “Broken sidewalk, no crosswalk. East Market and B by 7-11. Always see people tripping and falling. Sidewalk is collapsing will break water main soon.”
- **Accessible Parking:** “Better enforcement of handicap parking spaces.”
- **Sidewalks:** “Any of the sidewalks that aren't on the main road are horrid. Cracked, roots causing bumps and dips, lack of curb ramps. I'm a disabled parent of small children. The parks are getting better every year with one exception.”

For full survey documentation, including submitted photos of ADA barriers, see **Appendix D**.

For a map of reported ADA barriers, see **Figure D-1**.

Figure D-1. City of Aberdeen ADA Barrier Public Survey Map



D.5 ADA Public Workshop

A hybrid in-person/virtual ADA public workshop was held June 2, 2025, from 6:00pm to 7:00pm at the Rotary Log Pavilion in Aberdeen. The meeting was recorded. The presentation provided an overview of the ADA Transition Plan requirements, the project's progress on ADA barrier findings in Aberdeen thus far. A recording of the meeting is available upon request.

Five members of the public attended, including two City of Aberdeen City Council members, two city residents, and one Arc of Grays Harbor representative. Four city employees and two consultants on the project team were also present. There were no virtual attendees. Feedback included the following topics:

- Presence of overhanging and encroaching vegetation as a barrier to sidewalks and pedestrian access routes.
- Presence of parked cars as barriers to intersection sight distance for pedestrians trying to cross streets.
- Lack of pavement striping, missing curb ramps and sidewalks, and presence of drainage ditches (such as Evans Street in south Aberdeen that makes navigation difficult for pedestrians).
- It is difficult for pedestrians to access public transportation routes from residential to arterial streets.
- Lack of curb ramps and presence of damaged street surface in crosswalk area between E St and Burleigh Ave near Sam Benn Park.
- Request for making ADA improvements at Transit Center and Senior Center and routes to public transportation.
- Request for existing maintenance on existing infrastructure.
- Request for transit user pedestrian counts to inform prioritization of ADA barriers.
- Question regarding potential sources of ADA barrier removal funding other than the State Transportation Improvement Program (STIP).

For the ADA Public Workshop slide presentation and documentation, see **Appendix D**.

D.6 Draft Plan Public Comment Opportunities

D.6.1 Draft Plan Public Comment Period

On October 29, 2025, the Draft ADA Transition Plan with appendixes was posted on the city's project webpage for public comment. The Draft Plan public comment period was promoted via newsflash on the city's website homepage, on Facebook®, via direct email to ADA public survey respondents open to receiving follow up correspondence, and to local ADA community organizations identified in **Section D.3**. The Draft Plan was also promoted in the Daily World (www.thedailyworld.com) digital news publication in late October 2025. For the article, see **Appendix D**.

Five public comments were received via email on the Draft ADA Transition Plan during the public comment period between October 29, 2025, and November 12, 2025. The October 29 Facebook® post received 6 replies. Some of the public comments were specifically related to ADA topics while other comments focused on other topics. For the specific emails and comments, see **Appendix D**.

D.6.1 City Council Meeting

The Draft ADA Transition Plan was presented to the City of Aberdeen's City Council meeting held November 12, 2025, at 6:30pm. This meeting was open to the public. One member of the public who

also submitted an email comment gave a spoken positive comment on the Draft ADA Transition Plan. There were no comments or questions from City Council members.

Presentation materials were provided in accessible formats with alternative text prior to the event. The presentation explained the reasons for and required content of an ADA Transition Plan and the city's phased approach to self-evaluation and barrier removal implementation. Meeting minutes are available on the City's website at: <https://www.aberdeenwa.gov/275/City-Council>. A recording of the meeting is available upon request.

D.7 Public Engagement Barrier Removal Schedule Recommendations

It is recommended the City:

- Consider addressing ADA barriers on streets specifically mentioned by the public including Burleigh Avenue and Evans Street before other ADA barriers.
- Consider addressing ADA barriers along tsunami evacuation routes.
- Consider addressing existing ADA barriers through maintenance.
- Consider adding pavement striping to areas where no dedicated pedestrian facilities exist.
- Consider addressing sidewalk gaps between existing sidewalk segments to complete accessible pedestrian routes, including connections to transit routes, parks (including Sam Benn Park), the Transit Center, and the Senior Center.
- Considering seeking out potential sources of ADA barrier removal funding other than the State Transportation Improvement Program (STIP).

E. Future Actions to Achieve Compliance

The city is pursuing a phased approach to its ADA Self-Evaluation and Transition Plan. This first phase focused on self-evaluation, barrier prioritization, and ADA barrier removal scheduling for the public right-of-way including curb ramps, sidewalks, driveways, accessible pedestrian signals (APS), rectangular rapid flashing beacons (RRFBs) and paved shared-use trails.

Other barriers to ADA accessibility need to be addressed by the city.

E.1 Future Actions Needed for Other City Facilities

The city owns/maintains facilities of other types that were not within the scope of this public right-of-way focused Plan. These facilities include:

- City buildings with publicly accessible areas
- City park facilities including building structures, restrooms, recreational areas, and accessible parking for building and recreational sites
- City trails – non-paved facilities intended for recreational use
- Accessible parking at City building and park facility sites

E.3 Future Actions Needed for Programs, Services, and Activities

The city of Aberdeen also provides public programs, services and activities. The city addressed the policy and procedure requirements identified in **Chapter B** above. The city should conduct an internal self-assessment and barrier prioritization for programmatic barriers.

On April 24, 2024, the U.S. Department of Justice issued a final rule on the accessibility of web content and mobile applications (apps) provided by state and local governments. State and local governments must make sure their web content and mobile apps meet WCAG 2.1, Level AA within two or three years of when the rule was published on April 24, 2024, depending on their population.

- State and local governments with a population of 50,000 or more persons must be in compliance by April 26, 2026.
- State and local governments with a population between 0-49,999 persons and special district governments must be in compliance by April 26, 2027 (the City of Aberdeen is in this category).

For information about and a guide to the recently issued final rule, see **Appendix E**.

E.4 Annual Report of Barriers Removed

To ensure implementation of this ADA Transition Plan, it is recommended that the city produce an annual ADA Progress Report showing the city's progress on ADA barrier removal. It is recommended that the official responsible for implementation of the PROW ADA Transition Plan coordinate this effort in cooperation with relevant city staff from other departments.

E.5 Five-Year ADA Transition Plan Update Schedule

This ADA Transition Plan is a living document and is intended to be reviewed and updated at five-year intervals. As the Plan is updated, an updated barrier removal schedule will be identified. With each five-year Plan update, an official public comment period is recommended to continue public engagement. The inventories and cost estimates will be re-analyzed at each five-year Plan update to determine patterns of need as it relates to the inventory needs and barrier removal prioritization. The City may also use its public Transportation Benefit District GIS mapping tool to track ADA barrier removal progress.

F. Accessibility Regulations, Standards, & Guidelines Resources

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

F.1 General Resources

Federal ADA Regulations

- State and Local Governments covered by [ADA Title II Regulations \(28 CFR Part 35\)](#)
- Places of Public Accommodation covered by [ADA Title III Regulations \(28 CFR Part 36\)](#)

U.S. Access Board Standards

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

U.S. Department of Justice Guidelines

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

WSDOT Local Agency Guidelines

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

F.2 Barrier-Specific Resources

Public Right of Way:

- [ADA Title II Technical Assistance Manual](#)
- [U.S. DOJ ADA Best Practices Tool Kit for State and Local Governments](#)
- [U.S. Access Board PROWAG \(Proposed Public Rights of Way Accessibility Guidelines \(2023\)](#)
- [WSDOT Field Guide for Accessible Public Rights of Way \(2012\)](#)

Building, Park & Trail Facilities

- [ABA \(Architectural Barriers Act\) Chapters 2 and 10 Amendments \(2013\)](#)
- [ADA Title III Technical Assistance Manual](#)
- [US Access Board Federal Outdoor Developed Areas Accessibility Standards \(May 2014\)](#)

Programmatic (Services, Programs and Activities):

- [National ADA Network Title II Tutorial](#)
- [U.S. DOJ ADA Best Practices Tool Kit for State and Local Governments](#)
- [Accessibility of Web Content and Mobile Apps Provided by State and Local Governments](#)

G. Closing Summary

The City of Aberdeen is committed to removing barriers to accessibility in its services, programs, and activities to comply with the Americans with Disabilities Act (ADA). This Public Right-of-Way ADA Transition Plan:

- Identifies **barriers** that make it hard for people with disabilities to access the public right-of-way.
- Identifies **how to fix the barriers** and **how much it costs** to fix the barriers.
- Identifies when to fix barriers with a **schedule**.
- Identifies a **person in the City leadership** who will ensure barriers are fixed each schedule year.

This Plan also meets the following WSDOT Local Agency Guidelines requirements:

- Designates and ADA/504 Coordinator
- Adopts and publishes an ADA Compliance/Grievance Procedure
- Adopts an Accessible Pedestrian Signal (APS) Policy

The self-evaluation and barrier prioritization provided in this Plan addresses all of the following public right-of-way facility types:

- Curb ramps
- Sidewalks
- Driveways where they intersect sidewalks
- Accessible pedestrian signals and flashing beacons at pedestrian crossings
- Paved paths designated as pedestrian access routes

The City provided the public with opportunities to comment on the project during its development at the June 2025 Public Workshop and during the draft plan public comment period in late October/early November 2025.

The City can use this PROW ADA Transition Plan to ensure ADA barrier removal is a component of future transportation improvements. The City will also periodically update this Plan to show ADA barrier removal progress over time.