

# WESTERN PIEDMONT COUNCIL OF GOVERNMENTS

## ADA TRANSITION PLAN

FEB. 2022





---

*Creative Regional Solutions Since 1968*

# Western Piedmont Council of Governments

---

## ADA TRANSITION PLAN

**ADOPTED BY**  
**WPCOG POLICY BOARD**

**DATE**

Month Day, Year

**PREPARED BY**



**Western Piedmont**  
Council of Governments

*Creative Regional Solutions Since 1968*

# TABLE OF CONTENTS

	<b>EXECUTIVE SUMMARY</b>	<b>5</b>
	TITLE II OF THE AMERICAN WITH DISABILITIES ACT OF 1990 (ADA)	<b>6</b>
	SECTION 504 OF THE REHABILITATION ACT OF 1973	<b>6</b>
	<b>WPCOG ADA TRANSITION PLAN</b>	<b>7</b>
	WESTERN PIEDMONT COUNCIL OF GOVERNMENTS ADA WEBSITE	<b>7</b>
	<b>POPULATION WITH A DISABILITY OR FUNCTION DIFFICULTY ANALYSIS</b>	<b>7</b>
	<b>FACILITY ASSESSMENT INTRODUCTION</b>	<b>10</b>
	<b>FACILITY ASSESSMENT PRIORITIES</b>	<b>10</b>
	<b>FACILITY ASSESSMENT METHODOLOGY</b>	<b>11</b>
	<b>FACILITY ASSESSMENTS</b>	<b>12 - 20</b>
	<b>PEDESTRIAN RIGHT OF WAY METHODOLOGY</b>	<b>21</b>
	<b>INTRODUCTION TO PEDESTRIAN RIGHT OF WAY CATEGORIES AND TECHNICAL STANDARDS</b>	<b>21</b>
	<b>EXTERNAL AREA ASSESSMENTS</b>	<b>24 - 26</b>
	<b>CONCLUSION</b>	<b>27</b>
	<b>REFERENCES</b>	<b>27</b>
	<b>PUBLIC COMMENTS</b>	<b>27</b>
	<b>APPENDICES</b>	<b>27</b>



## EXECUTIVE SUMMARY

Facilities with mobility barriers can inhibit community accessibility, access to services, and social participation for people with disabilities. Creating an inventory and plan of action for removing mobility barriers within and surrounding facilities is a crucial step to creating a more accessible environment for all. The primary purpose of this study is to prepare a plan, titled Americans with Disabilities Act (ADA) Transition Plan, for Western Piedmont Council of Governments (WPCOG) in accordance with two civil rights legislations:

1. Americans with Disabilities Act of 1990 (ADA), Title II Regulations, Nondiscrimination on the Basis of Disability in State and Local Government Services, 28 CFR Part 351 , and
2. Section 504 of the Rehabilitation Act of 1973, as amended, Nondiscrimination on the Basis of Disability in Programs or Activities Receiving Federal Financial Assistance, 49 CFR Part 27.

The intent of the ADA Title II regulation is to ensure nondiscrimination and access for individuals with disabilities in State and local government services. Section 504 regulations prohibit discrimination on the basis of disability in programs or activities receiving Federal financial assistance.

This report will identify barriers within WPCOG as well as outside elements within the pedestrian right of way that obstruct access to the building and its services. The pedestrian right of way includes any infrastructure meant for pedestrian utilization. Mobility hazards are identified during walking audits and documented in a Pedestrian Right of Way Collector Application. The application collects a broad range of data and has criteria for sidewalks, curb ramps, driveway cuts, intersections, railroad crossings, bus stops, crosswalks, and pedestrian islands. In addition to the facility write-up, this report also includes the parking area, sidewalk connecting to the building, and facility entry points within the pedestrian right of way section. Sidewalk on 19th St NW and 2nd Ave NW were not included within the facility inventory. These sidewalks are owned and maintained by the Town of Long View.

The WPCOG is required to conduct a self-assessment and to establish a transition plan (28 CFR 35.105-35.107). The pedestrian right of way inventory collection process (mentioned above) utilizes the United States Access Board's Proposed Right-of-Way Accessibility Guidelines (PROWAG). The facility inventory was conducted using a checklist based on the 2010 ADA Standards for Accessible Design. Items not complying with ADA standards are referred to as high, moderate, or low priority items. Items that are not included within standards but could improve accessibility are only recommendations. Recommendations are not required to be fixed, but are still ranked by high, moderate, or low severity.

This is a living document that must be updated on a continual basis. WPCOG will document all progress in achieving the objectives of Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990, and the ADA Amendments Act of 2008.

## **TITLE II OF THE AMERICANS WITH DISABILITIES ACT OF 1990 (ADA)**

Title II applies to state and local government entities, and protects qualified individuals with disabilities from discrimination on the basis of disability in services, programs, and activities provided by State and local government entities. Title II extends the prohibition on discrimination established by section 504 of the Rehabilitation Act of 1973, as amended, 29 U.S.C. 794, to all activities of State and local governments regardless of whether these entities receive Federal financial assistance.

State and local governments are required to follow specific architectural standards in the new construction and alteration of their buildings. They also must relocate programs or otherwise provide access in inaccessible older buildings, and communicate effectively with people who have hearing, vision, or speech disabilities. Public entities are not required to take actions that would result in undue financial and administrative burdens. They are required to make reasonable modifications to policies, practices, and procedures where necessary to avoid discrimination, unless they can demonstrate that doing so would fundamentally alter the nature of the service, program, or activity being provided.

## **SECTION 504 OF THE REHABILITATION ACT OF 1973**

Section 504 of the 1973 Rehabilitation Act was the first disability civil rights law to be enacted in the United States. It prohibits discrimination against people with disabilities in programs that receive federal financial assistance, and set the stage for enactment of the Americans with Disabilities Act. Section 504 works together with the ADA and the Individuals with Disabilities Education Act (IDEA) to protect children and adults with disabilities from exclusion, and unequal treatment in schools, jobs and the community.

## WPCOG ADA TRANSITION PLAN

WPCOG created a transition plan to identify mobility barriers and create a plan of action for the facility as well as the surrounding pedestrian infrastructure. The following is included in the plan:

- Inventory Collection: Database for WPCOG facility, parking lot, sidewalks, curb ramps, driveway cuts, and parking area
- Transition Plan: Establish High / Medium /Low Impact Areas to be corrected based on the site evaluation surveys
- Maintenance of all Changes/Improvements to Documents: Inventory database and transition plan

## WESTERN PIEDMONT COUNCIL OF GOVERNMENTS ADA WEBSITE

WPCOG provides support and guidance in posting necessary documents regarding ADA legislation and other useful resources. WPCOG's ADA webpage includes a subset for each contracted municipality's ADA documents, transition plans, and grievance procedures. The WPCOG ADA Transition Plan is posted on the ADA webpage for public review.

## POPULATION WITH A DISABILITY OR FUNCTION DIFFICULTY ANALYSIS

In planning for accessibility, analyzing data for populations with disabilities or function difficulty will better allow WPCOG to assess and plan for eliminating mobility barriers. WPCOG serves the four county region of Alexander, Burke, Caldwell, and Catawba Counties. The following displays an overview of the most common function difficulties found within the four county region served by WPCOG. The United States Census "attempts to capture six aspects of disability". These aspects include hearing, vision, cognitive, ambulatory, self-care, and independent living difficulties, which can be used together to create an overall disability measure, or independently to identify populations with specific disability types.

Each disability type, as defined by the U.S. Census, can be found below.

- Hearing difficulty - deaf or having serious difficulty hearing.
- Vision difficulty - blind or having serious difficulty seeing, even when wearing glasses.
- Cognitive difficulty - Because of a physical, mental, or emotional problem, having difficulty remembering, concentrating, or making decisions.
- Ambulatory difficulty - Having serious difficulty walking or climbing stairs.
- Self-care difficulty - Having difficulty bathing or dressing.
- Independent living difficulty - Because of a physical, mental, or emotional problem, having difficulty doing errands alone such as visiting a doctor's office or shopping.

Table 1 displays the total civilian noninstitutionalized population for Alexander, Burke, Caldwell, and Catawba Counties. Each disabled civilian noninstitutionalized population is broken down by percentage for each disability type. As shown below, almost eighteen percent of Alexander County's civilian noninstitutionalized population have some form of disability or function difficulty. Compared to the other three counties, Alexander represents the lowest county percentage of people with a vision difficulty at 2.5%. Approximately one in five people living in Burke County have a disability (20.2%), which is the highest disability percentage of the four counties. Burke also represents the highest percentage of people with hearing difficulty at 7.3%. This high percentage could be due to the North Carolina School for the Deaf's location in Morganton. Almost 8.5 thousand (11.1%) of the 81,040 Caldwell population have difficulty walking or climbing stairs. This is almost three percent higher than the percentage of the population in Catawba County with an ambulatory difficulty of 8.2%. Catawba County has the lowest percentage of citizens with a disability and the highest population of noninstitutionalized civilians (over 150,000 persons). Catawba also has the lowest hearing, cognitive, ambulatory, and independent living difficulty percentages of the four counties.

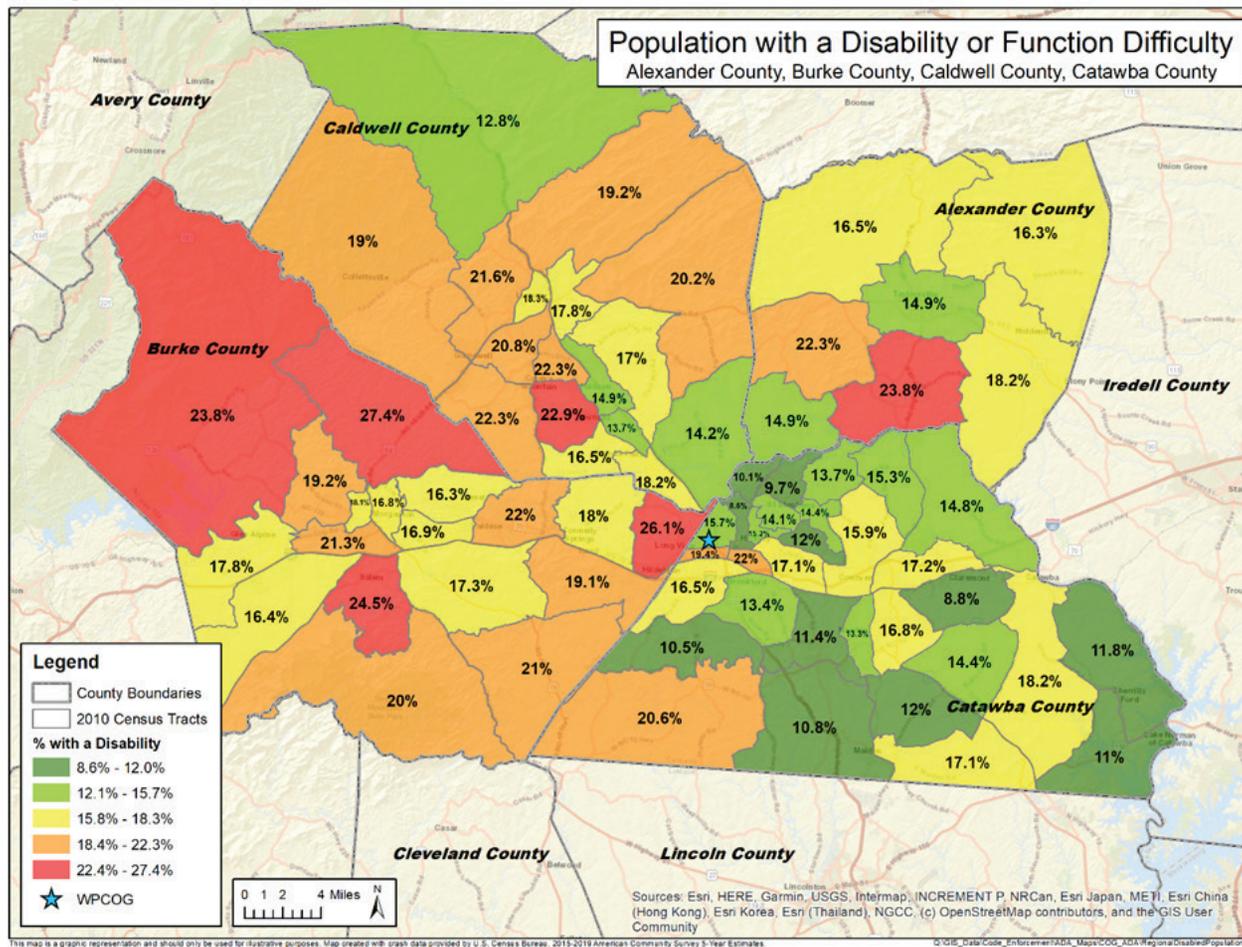
**Table 1 Percentages of Civilian Noninstitutionalized Population with a Disability of Function Difficulty**

Geography	Total Civilian Noninstitutionalized Population	% With a Disability	% Hearing Difficulty	% Vision Difficulty	% Cognitive Difficulty	% Ambulatory Difficulty	% Self-Care Difficulty	% Independent Living Difficulty
Alexander County	35,908	17.8	4.6	2.5	6.4	10.5	3.8	8.3
Burke County	87,554	20.2	7.3	4.6	7.7	10.9	4.1	8.6
Caldwell County	81,040	18.6	4.8	3.3	7.6	11.1	3.8	7.7
Catawba County	156,051	14.2	4.5	2.7	5.8	8.2	3.4	6.8

**Source:** United States Census, 2015-2019 American Community Survey (ACS) 5-Year

Map 1 shows the percentage of the civilian noninstitutionalized population with a disability within the 2010 Census Tracts of Alexander, Burke, Caldwell, and Catawba Counties. The map uses a dark green, light green, yellow, orange, and red color ramp to illustrate where the Tract falls on this percentage range. Dark green represents the low end of the range and red represents the highest end. All eleven dark green Tracts, with disabled populations ranging from 8.6 to 12.0%, are within Catawba County. This placement correlates with Catawba's low disability percentages listed in Table X.1. Eleven out of the sixteen light green (or second lowest range of disabled population percentage) are also in Catawba County. Yellow denotes the middle percent range of civilian noninstitutionalized population with a disability or difficulty. Middle percentages range from 15.8 to 18.3% and can be seen in the northeast corner of the region in Alexander County and along the Interstate 40 / Highway 70 corridor. Thirteen of the seventeen orange filled tracts (or next to highest range, 18.4 to 22.3%) are located in the western half of the region. The highest disability percentages, or red range, includes six Tracts. High percentages range from 22.4 to 27.4 %.

**Map 1**



## FACILITY ASSESSMENT INTRODUCTION

As mentioned above, Title II of the ADA only impacts municipally owned facilities. This title does not address employment or issues concerning other sections of the ADA. This is why the following facility assessment does not cover private areas of each facility utilized only by employees.

Although many situations allow issues of accessibility to be resolved by changes to program accommodation, there are situations where access to programs, services and activities can only be achieved by removal of physical barriers. This report identifies such physical barriers within WPCOG and from the nearest public way and/or accessible parking space(s) to the building.

Relative to Program Access as stipulated in Title II, state and local governments/agencies, "Are not required to take any action that would result in the fundamental alteration in the nature of the service, program, or activity or in undue financial and administrative burdens. However, public entities must take any other action, if available, that would not result in a fundamental alteration or undue burdens but would ensure that individuals with disabilities receive the benefits or services."

Many feel that only new construction and alterations need to be accessible and that older facilities are "grandfathered". However, because the ADA is a civil rights law and not a building code, older facilities are often required to be accessible to ensure that people with disabilities have an equal opportunity to participate.

This report was prepared for WPCOG as part of an effort to:

1. Comprehensively document elements of the built environment which negatively impact individuals with disabilities.
2. Plan for most important facility improvements in conjunction with the 2010 ADA Standards for Accessible Design. Included in Appendix A.

## FACILITY ASSESSMENT PRIORITIES

This report's ADA compliance information is organized to follow three priorities for barrier removal as recommended by the Department of Justice in the ADA Title II regulations. The three priorities are included and color coded as follows:

Priority 1 - High Priority	Priority 2 - Moderate Priority	Priority 3 - Low Priority	Technically Infeasible or Not Applicable
Accessible Approach and Entrance	Access to goods and services and access to public toilet rooms	Access to other items such as water fountains and public telephones	Certain standards do not apply to facilities built prior to March 12, 2012. These items have been noted and do not need to be corrected unless the facility is altered. Measurements within a reasonable tolerance range that would involve undue burden to correct as well as structural or financial infeasibility are covered under technically infeasible.

Priority 1 (High) items are more time sensitive mobility barriers that should be corrected first. According to regulations, these items are most unsafe or present more immediate liabilities for municipalities. Priority 3 (Low) items are less time sensitive. The following methodology is a modified version of the ADA National Network Guidelines (found in Appendix A). This report is meant to be a living document, therefore, items can be modified as they are addressed.

## FACILITY ASSESSMENT METHODOLOGY

The survey team relied on guidelines approved by the ADA National Network while inventorying the facility and outside elements within the pedestrian right of way. The resulting methodology correlates with the methodology found in the facility survey guidelines. A facility survey can be found in Appendix A.

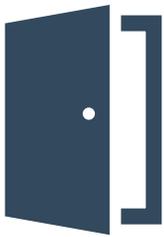
**High/Critical Priority** – This relates to immediate safety hazards as well as direct access to the facility. Without proper facility access, the categories below become null. Most common high priority items relate to door pressures and closure times. Exterior doors relate directly to access to a facility as well as most interior doors. Some interior doors relate more to access to goods and services, however, for consistency, doors are scored using the same criteria. There are no set standards for exterior door pressures, but no more than 10 pounds is recommended. Interior doors have a required pressure of 5 pounds or less. Both interior and exterior door closure times cannot take less than 5 seconds to close from a 90 degree open position to 12 degrees from the door latch.

**Moderate Priority** – This relates to less severe safety hazards as well as access to goods and services and public restrooms (certain issues within service areas or public restrooms may still fall into high or low categories depending on the severity of the issue).

**Low Priority** – This relates to non-compliant issues that do not pose an immediate safety hazard as well as access to an accessory (items such as water fountains and public telephones). Most items received a “low” score if only 5” or less out of compliance within the facility.

**Not applicable/technically infeasible** – This could be due to changing standards, measurements within a reasonable tolerance range, structural or financial infeasibility, etc. As stated above, certain standards do not apply to facilities built prior to March 12, 2012. These items have been noted and do not need to be corrected unless the facility is altered.

**\*\*Note:** High, moderate, and low recommendations are included in the plan for consideration. Recommendations are not based on standards and, therefore, are not required. They are still ranked according to severity.



# Door Pressures

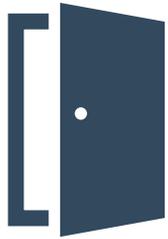
## General Observations & Recommendations

**Pressure and Closure Guide:** There are no set standards for exterior door pressures, but no more than 10 pounds is recommended. Interior doors have a required pressure of 5 pounds or less. Both interior and exterior door closure times cannot take less than 5 seconds to close.

### High Priority

<p><b>Exterior Double Doors at Main Lobby</b> <i>Right and left entries are determined from outside of the building looking inward</i></p> <p><b>Right Door:</b></p> <ul style="list-style-type: none"> <li>• Pull Pressure: 14 pounds <b>(high)</b></li> <li>• Push Pressure: 21 pounds <b>(high)</b></li> <li>• Closure Time: 2.71 seconds <b>(high)</b></li> </ul> <p><b>Left Door:</b></p> <ul style="list-style-type: none"> <li>• Pull Pressure: 16 pounds <b>(high)</b></li> <li>• Push Pressure: 23 pounds <b>(high)</b></li> <li>• Closure Time: 2.35 seconds <b>(high)</b></li> </ul>	<p><b>Interior Double Doors at Main Lobby</b> <i>Right and left entries are determined from outside of the building looking inward</i></p> <p><b>Right Door:</b></p> <ul style="list-style-type: none"> <li>• Pull Pressure: 10 pounds <b>(high)</b></li> <li>• Push Pressure: 15 pounds <b>(high)</b></li> <li>• Closure Time: 1.96 seconds <b>(high)</b></li> </ul> <p><b>Left Door:</b></p> <ul style="list-style-type: none"> <li>• Pull Pressure: 10 pounds <b>(high)</b></li> <li>• Push Pressure: 15 pounds <b>(high)</b></li> <li>• Closure Time: 1.90 seconds <b>(high)</b></li> </ul>	<p><b>Interior Double Doors in Main Lobby</b> <i>Leading into Conference Room A1 – Right and left entries are determined from standing outside of the conference room looking inward</i></p> <p><b>Right Door:</b></p> <ul style="list-style-type: none"> <li>• Pull Pressure: 15 pounds <b>(high)</b></li> <li>• Push Pressure: 20 pounds <b>(high)</b></li> <li>• Closure Time: 4.06 seconds <b>(high)</b></li> </ul> <p><b>Left Door:</b></p> <ul style="list-style-type: none"> <li>• Pull Pressure: 12 pounds <b>(high)</b></li> <li>• Push Pressure: 18 pounds <b>(high)</b></li> <li>• Closure Time: 3.48 seconds <b>(high)</b></li> </ul>	<p><b>Interior Double Doors in Hallway</b> <i>Leading into Conference Room A1 – Right and left entries are determined from standing outside of the conference room looking inward</i></p> <p><b>Right Door:</b></p> <ul style="list-style-type: none"> <li>• Pull Pressure: 10 pounds <b>(high)</b></li> <li>• Push Pressure: 13 pounds <b>(high)</b></li> <li>• Closure Time: 3.34 seconds <b>(high)</b></li> </ul> <p><b>Left Door:</b></p> <ul style="list-style-type: none"> <li>• Pull Pressure: 13 pounds <b>(high)</b></li> <li>• Push Pressure: 14 pounds <b>(high)</b></li> <li>• Closure Time: 3.15 seconds <b>(high)</b></li> </ul>
---	---	---	--

<p><b>Interior Door from Main Lobby to Hallway</b></p> <ul style="list-style-type: none"> <li>• Pull Pressure: 11 pounds <b>(high)</b></li> <li>• Push Pressure: 11 pounds <b>(high)</b></li> <li>• Closure Time: 2.69 seconds <b>(high)</b></li> </ul>	<p><b>Exterior Door Rear of Conference Room A1</b></p> <ul style="list-style-type: none"> <li>• Pull Pressure: 14 pounds <b>(high)</b></li> <li>• Push Pressure: 14 pounds <b>(high)</b></li> <li>• Closure Time: 2.81 seconds <b>(high)</b></li> </ul>	<p><b>Interior Door Conference Room A1 - Doorway before Kitchen Entrance</b></p> <ul style="list-style-type: none"> <li>• Pull Pressure: 11 pounds <b>(high)</b></li> <li>• Push Pressure: 13 pounds <b>(high)</b></li> <li>• Closure Time: 4.24 seconds <b>(high)</b></li> </ul>
<p><b>Exterior Door Next to Kitchen Entrance</b></p> <ul style="list-style-type: none"> <li>• Pull Pressure: 13 pounds <b>(high)</b></li> <li>• Push Pressure: 10 pounds <b>(good)</b></li> <li>• Closure Time: 3.55 seconds <b>(high)</b></li> </ul>	<p><b>Interior Back Kitchen Door</b> <i>(Closest to parking lot)</i></p> <ul style="list-style-type: none"> <li>• Pull Pressure: 12 pounds <b>(high)</b></li> <li>• Push Pressure: 10 pounds <b>(high)</b></li> <li>• Closure Time: 3.15 seconds <b>(high)</b></li> </ul>	<p><b>Interior Front Kitchen Door</b> <i>(Hallway Door)</i></p> <ul style="list-style-type: none"> <li>• Pull Pressure: 11 pounds <b>(high)</b></li> <li>• Push Pressure: 11 pounds <b>(high)</b></li> <li>• Closure Time: 3.41 seconds <b>(high)</b></li> </ul>



## General Observations & Recommendations (Continued)

**Pressure and Closure Guide:** There are no set standards for exterior door pressures, but no more than 10 pounds is recommended. Interior doors have a required pressure of 5 pounds or less. Both interior and exterior door closure times cannot take less than 5 seconds to close.

### High Priority

<p><b>Interior Hallway Door</b> <i>(Next to women's restroom)</i></p> <ul style="list-style-type: none"> <li>• Pull Pressure: 10 pounds <b>(high)</b></li> <li>• Push Pressure: 10 pounds <b>(high)</b></li> <li>• Closure Time: 3.67 seconds <b>(high)</b></li> </ul>	<p><b>Women's Restroom Main Door</b></p> <ul style="list-style-type: none"> <li>• Pull Pressure: 15 pounds <b>(high)</b></li> <li>• Push Pressure: 15 pounds <b>(high)</b></li> <li>• Closure Time: 3.93 seconds <b>(high)</b></li> </ul>	<p><b>Men's Restroom Main Door</b></p> <ul style="list-style-type: none"> <li>• Pull Pressure: 15 pounds <b>(high)</b></li> <li>• Push Pressure: 15 pounds <b>(high)</b></li> <li>• Closure Time: 2.81 seconds <b>(high)</b></li> </ul>
<p><b>Exterior Door at Community and Regional Planning Department</b></p> <ul style="list-style-type: none"> <li>• Pull Pressure: 14 pounds <b>(high)</b></li> <li>• Push Pressure: 12 pounds <b>(high)</b></li> <li>• Closure Time: 5 seconds <b>(good)</b></li> </ul>	<p><b>Exterior Door at Storage Room</b></p> <ul style="list-style-type: none"> <li>• Pull Pressure: 12 pounds <b>(high)</b></li> <li>• Push Pressure: 16 pounds <b>(high)</b></li> <li>• Closure Time: 3.60 seconds <b>(high)</b></li> </ul>	<p><b>Interior Door for Regional Housing Authority</b></p> <ul style="list-style-type: none"> <li>• Pull Pressure: 16 pounds <b>(high)</b></li> <li>• Push Pressure: 12 pounds <b>(high)</b></li> <li>• Closure Time: 3.14 seconds <b>(high)</b></li> </ul>
<p><b>Interior Door</b> <i>Hallway door between Regional Housing Authority and Area Agency on Aging</i></p> <ul style="list-style-type: none"> <li>• Pull Pressure: 11 pounds <b>(high)</b></li> <li>• Push Pressure: 11 pounds <b>(high)</b></li> <li>• Closure Time: 3.41 seconds <b>(high)</b></li> </ul>	<p><b>Exterior Door for Regional Housing Authority</b></p> <ul style="list-style-type: none"> <li>• Pull Pressure: 16 pounds <b>(high)</b></li> <li>• Push Pressure: 15 pounds <b>(high)</b></li> <li>• Closure Time: 2.81 seconds <b>(high)</b></li> </ul>	



## Front Lobby & Entry

### General Observations & Recommendations

#### Moderate Priority

**1 wheelchair space is necessary for every 25 seats in the lobby.**

- The space should measure 36"x48" deep for forward approach and 36"x60" for parallel approach.
- A clear, accessible path from the front entrance to wheelchair spaces should be 36" wide.



## Hallways

### General Observations & Recommendations

**NOTE:** There must always be a 36" wide accessible pathway to all areas open to the public. Pathways cannot be obstructed and objects cannot protrude more than 4" into the circulation path.

- The light fixtures and fire extinguishers (pictured) all meet standards for protruding objects.



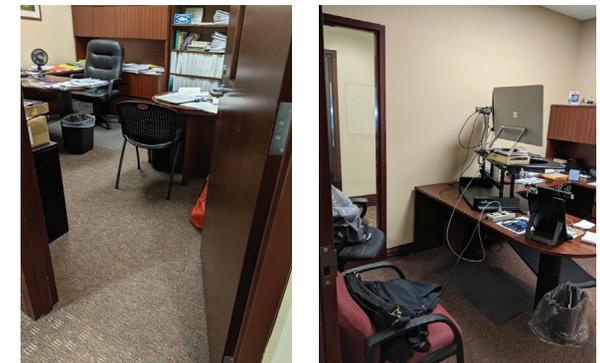
## Offices

### General Observations & Recommendations

#### Moderate Priority

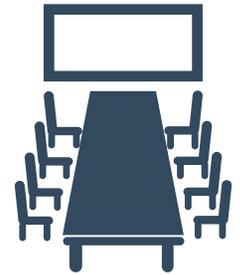
**A space large enough for a wheelchair resting area must be available in each office open to the public.**

- The space should measure 36"x48" deep for forward approach and 36"x60" for parallel approach. A clear, accessible path from the front entrance to wheelchair spaces should be 36" wide.



# Conference Rooms A1, A2, B, C, & D

## General Observations & Recommendations



Conference Room A1



Conference Room A2



Conference Room C



Conference Room D

### Moderate Priority

**1 wheelchair space is necessary for every 25 seats in each conference room.**

- The space should measure 36"x48" deep for forward approach and 36"x60" deep for parallel approach.
- A clear, accessible path from the entrance of each conference room to each wheelchair space should be 36" wide. Wheelchair accessible spaces should be dispersed throughout the room.

**There must be a 36" wide accessible pathway around and between all tables and furniture.**

- Pathways cannot be obstructed by cords and objects cannot protrude more than 4" into the circulation path.

### Moderate Recommendation

- Include directional and service-related signage in Braille for conference rooms that are located further away from the main entrance. Since Conference Room D is far from the main entrance, directional signage is recommended if the room is utilized by the public. Please see Priority 2 – Access to Goods and Services in Appendix A for more information.



Conference Room B



CONFERENCE  
D



# Kitchen

## General Observations & Recommendations

### Moderate Priority

**Place a sign on the latch side of the kitchen doorway letting visitors know that this area is the kitchen or break room area.**

- This sign should also be in Braille and follow the standards in Priority 2 - Access to Goods & Services in Appendix A.

### ADA standards require sufficient knee and foot space under lavatories.

- Cabinetry shall be permitted under the kitchen sink surface provided that all of the following conditions are met:
  1. The cabinetry can be removed without removal or replacement of the kitchen work surface;
  2. The finish floor extends under the cabinetry; and
  3. The walls behind and surrounding the cabinetry are finished.
- The kitchen sink must have a clear floor space for a forward approach at least 30 inches wide and 48 inches long that extends under the lavatory.
- 17 – 25 inches of clear floor space must extend under the lavatory so that a person using a wheelchair can get close enough to reach the faucet.
- There must be at least 27 inches clearance from the floor to the bottom of the lavatory that extends at least 8 inches under the lavatory for knee clearance.
- There must be at least 9 inches of toe clearance.
- All pipes under the lavatory must be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.

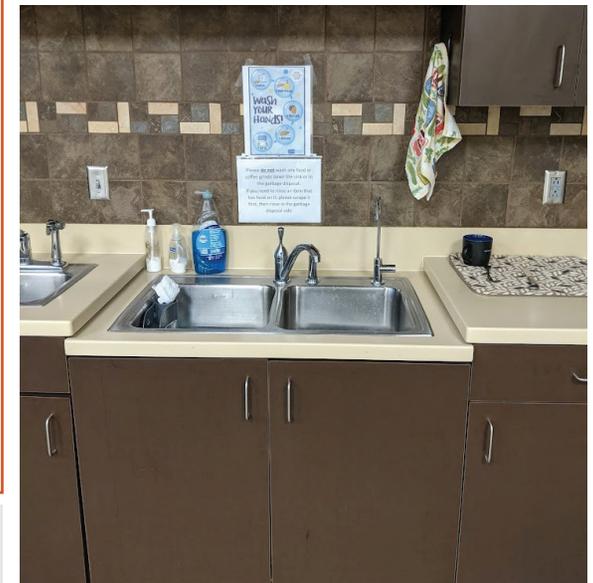
**NOTE:** The kitchen work surface shall be 34 inches maximum above the finish floor or ground. While the lavatory meets this standard, the other counter heights do not. The center kitchen table, however, can be used as the work space. This space must be between 29 – 36 inches high.

### 1 wheelchair space is necessary for every 25 seats in the kitchen.

- The space should measure 36"x48" deep for forward approach and 36"x60" for parallel approach. A clear, accessible path from the entrance of the kitchen to the wheelchair space should be 36" wide.

### The hand towels are not accessible to all.

- When located above counters no greater than 25 inches deep, hand towels cannot be higher than 44 inches above the floor.





## General Observations & Recommendations (Continued)



### Moderate Priority

**The recycling cans and both vending machines must be accessible to all users.**

- There must be a 36 inch wide accessible pathway to each with open floor space large enough for a wheelchair resting area.

# Men's Accessible Restroom



## General Observations & Recommendations



**NOTE:** Although two restrooms have larger dimensions and grab bars (required for accessible restroom stalls), only the largest stall at the back of the restroom can be considered an accessible restroom stall. Accessible restrooms must measure at least 60" wide by 56" long. Only the largest stall provides the required space.

### Moderate Priority

**ADA standards state that accessible pathways must be 36" wide.**

- After entering the restroom, the pathway narrows to 34" wide between the divider wall and trash receptacle. Shift the trash receptacle to the right for compliance.

**ADA standards state that accessible pathways must be 36" wide to at least one of each type of fixture, e.g. lavatory, hand dryer, etc.**

- Currently, the chair placed in the men's accessible restroom obstructs the path to the lavatory. Move the chair next to the toilet for compliance.

**The force required to activate the flush control can be no greater than 5 pounds.**

- At the time of inventory, the automatic flush sensor was broken. The manual flush mechanism must be easy to push and accessible.

**The force required to activate the faucet can be no greater than 5 pounds.**

- Currently, the faucet handles require 15 pounds of force to activate the hot water and 10 pounds of force to activate the cold water.





## Men's Accessible Restroom

### General Observations & Recommendations (Continued)

#### Technically Infeasible / Not Applicable

**Pull handles must be on both sides of the stall door.**

- Currently, there is only a lock and no pull handles.

**NOTE:** If constructed before 3/15/2012, door pulls do not need to be added unless renovated; door pulls are not required in the 1991 standards.



## Women's Accessible Restroom

### General Observations & Recommendations

**NOTE:** Although two restrooms have larger dimensions and grab bars (required for accessible restroom stalls), only the largest stall at the back of the restroom can be considered an accessible restroom stall. Accessible restrooms must measure at least 60" wide by 56" long. Only the largest stall provides the required space.

**NOTE:** The flush control must be open and easy to access. In the event that the automatic flush sensor is broken, the chair sitting next to the toilet must be moved. The force required to activate the flush control can be no greater than 5 pounds.

#### Moderate Priority

**The force required to activate the faucet can be no greater than 5 pounds.**

- Currently, the faucet handles require 9 pounds of force to activate the hot water and 7 pounds of force to activate the cold water.

#### Technically Infeasible / Not Applicable

**Pull handles must be on both sides of the stall door.**

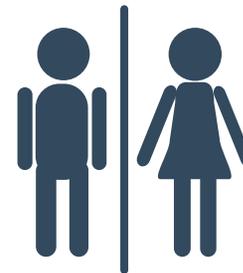
- Currently, there is only a lock and no pull handles.

**NOTE:** If constructed before 3/15/2012, door pulls do not need to be added unless renovated; door pulls are not required in the 1991 standards.



# Guest Accessible Restroom

## General Observations & Recommendations



### Moderate Priority

**ADA standards state that accessible pathways must be 36" wide to at least one of each type of fixture, e.g. lavatory, hand dryer, etc.**

- Keep the trash can next to the lavatory and in the corner so it will not obstruct the path to the lavatory.

**The force required to activate the faucet can be no greater than 5 pounds.**

- Currently, the faucet handles require 10 pounds of force to activate the hot water and 10 pounds of force to activate the cold water.



### Low Priority

**ADA standards require a toe clearance under lavatories that's at least 9" high.**

- Currently, only 7" of toe clearance is available due to the Eemax box mounted under the lavatory. The box should be moved up at least 2" if possible.

**ADA standards require at least 12" clearance between grab bars and protruding objects above.**

- The rear grab bar currently only has 11" between the bar and the towel dispenser above. The dispenser should be moved up at least 1" if possible.



# Building General

## General Observations & Recommendations

**NOTE:** Fire alarms must have flashing lights and audible signals.

### High Priority

**All inaccessible exterior entrances must have signs indicating the location of the nearest accessible entrance.**

- Since all exterior doors are locked except the front entrance, signage is necessary at locked doors to indicate the accessible entrance.

**Accessible parking spaces must be available at the closest accessible entrance.**

- The exterior entrance at the Regional Housing Authority department could be confusing for guests since there are accessible parking spaces.
- Since this entrance is now an employee entrance, signage stating "Employee Entry Only" must be prominent. This signage is recommended within view of the accessible parking spaces.

**Accessible entrance signage is required at accessible exterior entrances.**

- A sign is required at the accessible exterior entrance with the International Symbol of Accessibility.

**Accessible exits should be signed appropriately.**

- All wall-mounted signage pertaining to exits must include Braille.
- Signs must be mounted on the wall on the latch side of each door.
- For signs that are permanent, the baseline of the lowest character should be at least 48" high and baseline of lowest character no more than 60" high.
- The following exterior exits are marked incorrectly.
  - Planning Department exterior door
  - Storage Room exterior door
  - Regional Housing Authority exterior doors
  - Main Lobby exterior doors



## PEDESTRIAN RIGHT OF WAY METHODOLOGY

The following explains the methodology and ranking system used for the pedestrian elements within this plan. Items not complying with ADA standards are referred to as high, moderate, or low priority items. Items that are not included within standards but could improve accessibility are only recommendations. Recommendations are not required to be fixed, but are still ranked by high, moderate, or low severity.

**\*\*Note:** Renderings are only provided for priority items based on the proposed PROWAG ADA standards.

**Priority 1 (Red) High:** This category includes anything considered an immediate safety hazard according to standards. Many high priority items involving curb ramps can be corrected or improved by adding detectable warnings. Curb ramps or crosswalks leading pedestrians into roadways without detectable warnings (or truncated dome mats) are automatically ranked high priority. Detectable warnings are visually contrasting, colored mats with raised domes. These serve to warn pedestrians that are about to enter roadways. Detectable warnings are not necessary at driveway cuts, however, if not present at roadways and crosswalks, could present a dangerous mobility hazard for the visually impaired. Location, lighting, speed limits, and traffic volumes are also factors in determining which items should be ranked high priority. In addition to lack of detectable warnings, dangerous mobility examples include but are not limited to impassable sections of sidewalk due to obstruction or damage, cross slopes exceeding 10%, dangerous pedestrian crossings, etc.

**Priority 2 (Orange) Moderate:** This category includes less severe, but still hazardous safety issues according to standards. Location, lighting, speed limits, and traffic volumes are also factors in determining moderate priority issues. Mobility hazards in this category include but are not limited to vertical discontinuities resulting in potentially dangerous transitions, smaller obstructions that do not completely block accessible paths, cross slopes ranging from 5-10%, unsafe pedestrian crossings, etc.

**Priority 3 (Yellow) Low:** This category includes non-compliant issues that do not pose an immediate safety hazard according to standards. Location, lighting, speed limits, and traffic volumes are also factors in determining low priority issues. Mobility hazards in this category include but are not limited to small vertical discontinuities exceeding .5", curb ramps that are slightly misaligned, small cracks in sidewalks that could exceed .5" wide, most cross slopes ranging from 2-5%, etc.

**\*\*Note:** No low, moderate, or high priority items were found within the pedestrian elements of this Plan. Sidewalk on 19th St NW and 2nd Ave NW were not included within the facility inventory. These sidewalks are owned and maintained by the Town of Long View. High, moderate, and low recommendations are noted using a similar methodology. Recommendations are not required to be fixed, but are still ranked by high, moderate, or low severity.

## INTRODUCTION TO PEDESTRIAN RIGHT OF WAY CATEGORIES AND TECHNICAL STANDARDS

The following are proposed PROWAG ADA Standards for the pedestrian right of way utilized by the U.S. Access Board. Only the pedestrian right of way elements included in this Plan are covered.

## CURB RAMPS - PROWAG ADA STANDARDS

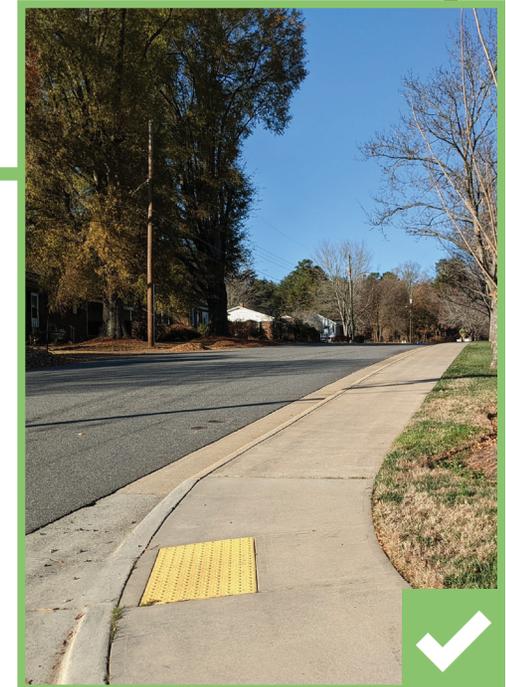
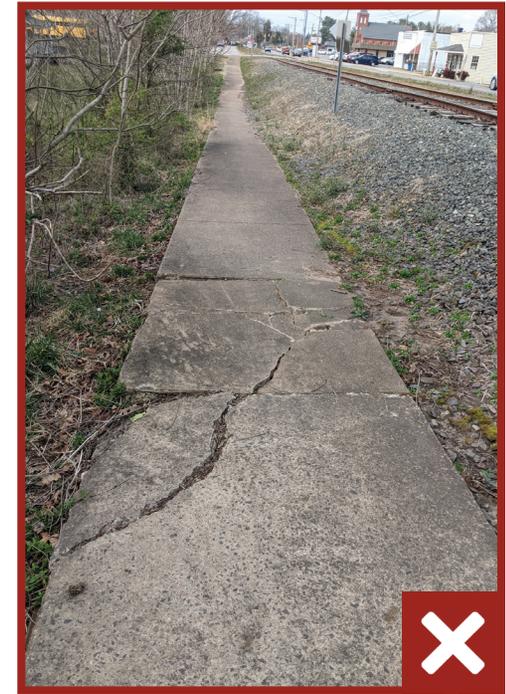


- » Detectable warnings, or truncated dome mats, are what warns visually impaired individuals that they are about to enter a roadway with vehicular traffic. These mats must visually contrast with the surrounding pavement and be placed at the back of the curb, right before the gutter. There are exceptions where back of curb is not always feasible, however, detectable warnings must be present when entering roadways. Detectable warnings must cover the entire depressed segment of curb and must be 24 inches wide. There should be a smooth surface around detectable warnings so that mats are more easily noticed. Detectable warnings are not necessary at residential driveway cuts. They are recommended at busy commercial driveway cuts.
- » The depressed curb must be at least 36 inches wide to allow for wheelchair accessibility.
- » If one curb ramp serves two adjoining crosswalks at two adjoining streets, there must be a space 48 inches wide and 48 inches deep that is outside of vehicle travel lanes and within the crosswalks. This space must be as level as possible. This is known as a diagonal curb ramp. While diagonal curb ramps are allowed, they are not recommended. New construction is advised against using diagonal curb ramps.
- » The cross slope of each curb ramp is measured parallel to the back of each detectable warning. The cross slope must not exceed 2% for a 4' area.
- » The running slope, or running grade, is measured perpendicular to the back of the detectable warning, where the ramp slopes downward towards the gutter. The running slope of curb ramps cannot exceed 8.33%.
- » The cross slope at the gutter, or foot, of the curb ramp cannot exceed 5%. The cross slope in this location is measured parallel to the front of each detectable warning.
- » If the curb ramp has flares that encroach on the pedestrian path of travel, the slope of each flare must measure 10% or less. This is measured parallel to the curb.
- » Curb ramps must have a level turning space that is 48 inches wide and 48 inches deep. Most turning spaces are at the top of the curb ramp. Turning spaces cannot exceed a 2% slope in all directions. If the turning space is constrained, the level turning space must be 48 inches wide by 60 inches deep. Turning spaces are considered constrained if taller curbs or other items block the area needed for proper foot space while turning in a wheelchair.
- » The transition between the ramp and walkway or street must be smooth and flush with the adjacent pavement or asphalt. There cannot be abrupt level changes or obstructions.
- » Curb ramps should have proper alignment. Curb ramps should align on either side of the intersection and/ or roadway and lead pedestrians in the proper direction. In some cases, due to drainage or other issues, this is not always feasible. These instances should be noted as plan items are addressed.

**Note:** There are many different types of curb ramps. Standards can differ slightly depending on curb ramp type. The following are general requirements for curb ramps using US Access Board technical standards.

## SIDEWALKS- PROWAG ADA STANDARDS

- » Sidewalks must be at least 4 feet wide for the pedestrian path of travel. 5 feet of width is recommended.
- » There cannot be vertical discontinuities exceeding ½ inches. Vertical discontinuities include cracks, height differences in concrete slabs, etc.
- » Walkway joints, grate openings, and cracks cannot exceed ½ inches wide. If grate openings exceed ½ inches wide, they should be turned perpendicular to the pedestrian path of travel.
- » Objects measuring 2.25-6.7 feet high cannot protrude more than 4 inches into the pedestrian path of travel.
- » Guardrails or barriers must be 2.25 feet maximum above the surface.
- » The pedestrian path of travel cannot exceed a 2% cross slope. The cross slope is measured perpendicular to the pedestrian path of travel.
- » If the sidewalk is NOT following a roadway, the running slope cannot exceed 5%. The running slope is measured parallel to the pedestrian path of travel. Sidewalks following roadways can have the same running grade as the roadway.
- » There must be a smooth travel surface with solid, compliant surface material such as concrete.
- » Sidewalks cannot be buckled or cracked. As stated above, cracks that do not exceed ½ inches in width are permissible.
- » Sidewalks should not have uneven or depressed segments. Depressed segments do not meet proper slope requirements and can cause drainage issues.
- » Sidewalks should not have overgrown vegetation. Any vegetation encroaching on the pedestrian path of travel should be removed. This includes trees or foliage protruding more than 4 inches into the pedestrian path of travel.
- » Sidewalks should not have noticeable drainage issues. Pooled water can create mobility barriers.
- » Trees incorporated into the sidewalk design should be covered by grates. As noted above, grate openings cannot exceed ½ inches in width. If wider than ½ inches, grate openings must be perpendicular to the pedestrian path of travel.
- » Sidewalks should have a designated furniture zone in areas with benches, trash bins, light poles, etc. The furniture zone should be placed on the same side of the sidewalk throughout the municipality for consistency.



# Approaching the Building

## General Observations & Recommendations

### High Recommendation

- Detectable warnings are only required when pedestrians are about to enter a roadway. Detectable warnings serve to alert visually impaired individuals that they are about to enter a roadway.
- Due to the busy parking lot, a detectable warning is recommended on the concrete at the transition from concrete to asphalt.
- Since the WPCOG exit leads to a parking lot and not a roadway, a detectable warning is only a recommendation for visually impaired individuals.



# Parking Area

## General Observations & Recommendations

There are currently 109 parking spaces and five of these spaces are accessible spaces. Of the five accessible spaces, three are van accessible spaces. All spaces meet the proper dimensions for van and accessible spaces. ADA standards require one accessible space for every 25 parking spaces, and for every six accessible spaces, one must meet the proper size dimensions for a van accessible space. If less than six accessible spaces are required, one must still be a van accessible space. All signs must be posted 60 inches above the ground. With curb height added, all WPCOG accessible parking signs meet the height signage requirement. While WPCOG meets all sign, slope, and dimension requirements for accessible spaces, the following recommendations could improve mobility for guests. Please see the requirements in Priority 1 - Approach and Entrance located in Appendix A if parking area is restriped.

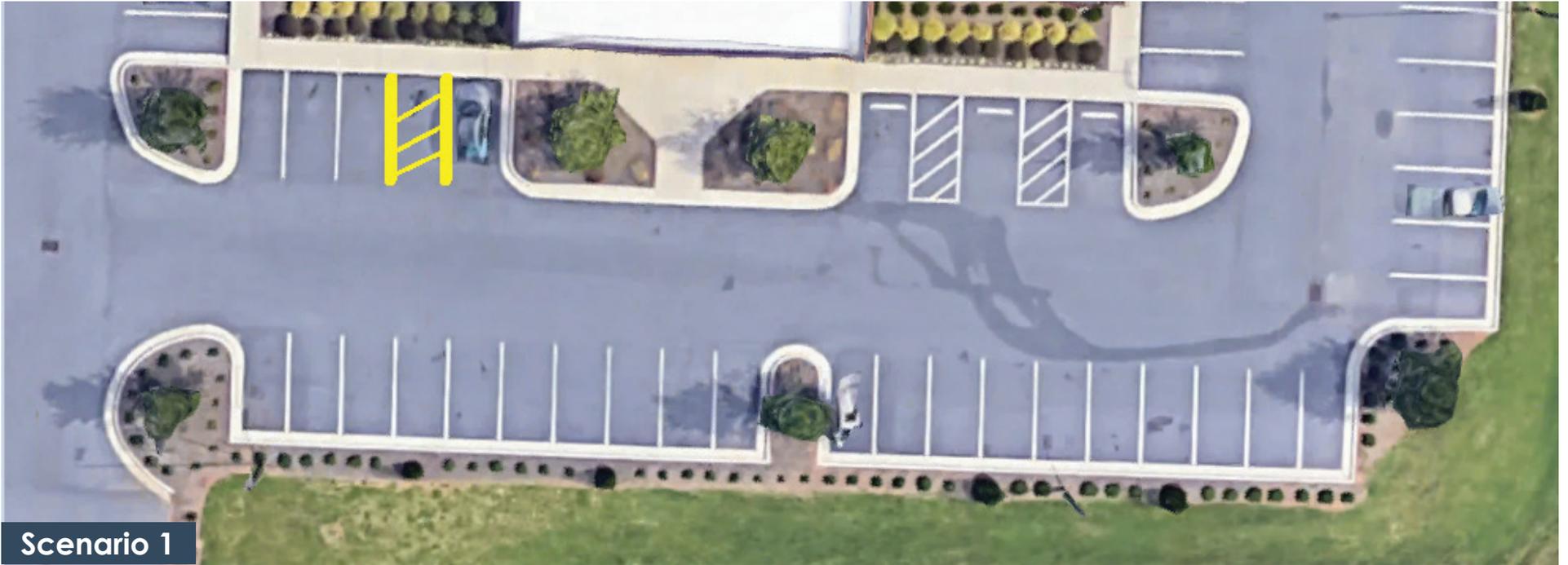
### High Recommendation

- The exterior employee only entrance at the Regional Housing Authority department could be confusing for guests since there are accessible parking spaces located outside of the entrance. Accessible parking spaces must be available at the closest public accessible entrance. Since this entrance is now an employee entrance, the two accessible spaces at the Regional Housing Authority department should be moved to the front entrance that is open to the public. Accessible parking spaces can share a striped accessible access aisle.

The following two scenarios provide options for adding accessible spaces to the front of the building, as recommended above.

In scenario 1, a curb ramp would have to be installed at a shared accessible access aisle. An example of where two additional accessible parking spaces could be located can be found below. The accessible spaces would be to the left and the right of the access aisle (displayed in yellow).

In scenario 2, both accessible spaces would have a shared access aisle. The access aisle must also have a striped accessible pathway that connects to the entrance. An example of where two additional accessible parking spaces could be located can be found below. The accessible spaces would be to the left and the right of the access aisle (displayed in yellow).



Scenario 1



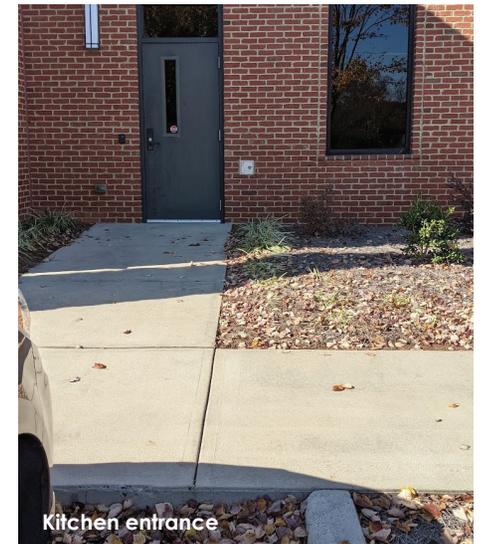
Scenario 2

# Parking Area

## General Observations & Recommendations (Continued)

### High Recommendation

- Curb ramps should be installed at each exterior exit OR between exits around the building. There should be a striped aisle to discourage parking at each curb ramp. In case of emergency, all exits should be fully accessible for safely and quickly exiting the building.



## CONCLUSION

Mobility barriers impact equitable access to goods and services. WPCOG offers services that, according to Title II of the Americans with Disabilities Act, must be made fully accessible to all members of the public. With proper transition planning, WPCOG will make the necessary changes to become fully accessible to all users. This Plan identifies all items that do not comply with ADA standards within areas open to the public at WPCOG. All items are ranked by priority and referred to as high, moderate, and low priority items. This Plan also offers recommendations to help accommodate accessibility through items that are not included within standards but could improve accessibility. Recommendations are not required to be fixed, but are still ranked by high, moderate, or low severity. Outside elements, or elements within the pedestrian right of way, were assessed using the proposed PROWAG standards utilized by the U.S. Access Board. The facility was surveyed using 2010 ADA Standards for Accessible Design produced by the ADA National Network guidelines. This is a living document that should be updated as WPCOG updates the facility and pedestrian infrastructure in coordination with ADA standards.

## PUBLIC COMMENT

There were no public comments for this plan.

## REFERENCES

Source: United States Census. Disability Status. Retrieved October 15, 2021, from [www.census.gov/quickfacts/fact/note/US/DIS010218#:~:text=Definition,vision%2C%20cognition%2C%20and%20ambulation](http://www.census.gov/quickfacts/fact/note/US/DIS010218#:~:text=Definition,vision%2C%20cognition%2C%20and%20ambulation).

Source: United States Census. How Disability Data are Collected from The American Community Survey. Retrieved October 15, 2021, from [www.census.gov/topics/health/disability/guidance/data-collection-acs.html](http://www.census.gov/topics/health/disability/guidance/data-collection-acs.html)

Source: Americans With Disabilities Act Accessibility Standards Accessed Date: October 15, 2021, from [www.access-board.gov/ada/](http://www.access-board.gov/ada/)

Source: State and Local Governments (Title II) Accessed Date: October 15, 2021, from [www.ada.gov/ada\\_title\\_II.htm#:~:text=Title%20II%20applies%20to%20State,State%20and%20local%20government%20entities](http://www.ada.gov/ada_title_II.htm#:~:text=Title%20II%20applies%20to%20State,State%20and%20local%20government%20entities).

Source: ADA Checklist for Existing Facilities Accessed Date: October 15, 2021, from [www.adachecklist.org/checklist.html](http://www.adachecklist.org/checklist.html)

## APPENDIX

**Appendix A:** ADA Checklist for Existing Facilities - [www.adachecklist.org/doc/fullchecklist/ada-checklist.pdf](http://www.adachecklist.org/doc/fullchecklist/ada-checklist.pdf)