

# Self-Evaluation and ADA Transition Plan

City of Orting

**Prepared For:**

City of Orting

**Prepared By:**

SCJ Alliance

Patrick Holm, PE

1201 Third Ave, Suite 550

Seattle, WA 98101

206.739.5454

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**SCJ ALLIANCE**  
CONSULTING SERVICES

# Self-Evaluation and ADA Transition Plan

## Project Information

Project: ADA Transition Plan

Prepared for: City of Orting  
P.O. Box 489  
Orting, WA 98360  
Contact Name: John Bielka, PE  
Contact Phone: 360.893.9014

## Project Representative

Prepared by: SCJ Alliance  
1201 Third Ave, Suite 550  
Seattle, WA 98101  
206.739.5454  
scjalliance.com

Contact: Scott Sawyer, PE  
[scott.sawyer@scjalliance.com](mailto:scott.sawyer@scjalliance.com)  
Patrick Holm, PE  
[patrick.holm@scjalliance.com](mailto:patrick.holm@scjalliance.com)  
Andrew Armstrong, EIT  
[andrew.armstrong@scjalliance.com](mailto:andrew.armstrong@scjalliance.com)

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## Signature

The technical material and data contained in this document were prepared under the supervision and direction of the undersigned, whose seal, as a professional engineer licensed to practice as such, is affixed below.

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Prepared by Andrew Armstrong, EIT

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Approved by Patrick Holm, PE

# Table of Contents

<b>1</b>	<b>Introduction .....</b>	<b>1</b>
<b>2</b>	<b>Legal Requirements .....</b>	<b>1</b>
2.1	Legal Mandate .....	1
2.1.1	Title I of the ADA .....	1
2.1.2	Title II of the ADA .....	1
2.2	ADA Self-Evaluation and Transition Plan Requirements .....	1
2.3	Public Involvement .....	2
2.4	ADA Coordinator .....	2
2.5	Requesting Accommodation .....	3
2.6	Filing a Grievance .....	3
2.7	Undue Burden .....	4
2.8	Public Outreach .....	4
2.9	State and Local Requirements .....	4
2.10	Public Notice Requirements .....	4
<b>3</b>	<b>Self-Evaluation of Policies, Procedures, and Programs .....</b>	<b>5</b>
3.1	Introduction .....	5
3.2	Programmatic Modification .....	5
3.3	Self-Evaluation Findings .....	5
3.3.1	Public Right of Way .....	5
3.3.2	Programs, Services, and Activities .....	8
<b>4</b>	<b>ADA Transition Plan .....</b>	<b>9</b>
4.1	Introduction .....	9
4.2	Prioritization of Barrier Removal .....	9
4.3	Barrier Removal Schedule .....	10
4.4	Curb Ramp Barrier Removal Triggers .....	16
4.5	Barrier Removal Budget .....	16

# List of Tables

Table 1. Highest Priority Curb Ramps .....	10
Table 2. Second Highest Priority Curb Ramps .....	11
Table 3. Lowest Priority Curb Ramps .....	11



## List of Figures

Figure 1. Curb Ramps Labeled by ADA Compliance .....6  
Figure 2. Noncompliant Curb Ramps labeled by Repair Method Needed .....7

## List of Appendices

Appendix A – References  
Appendix B – Estimate  
Appendix C – Zoomed In Maps  
Appendix D – City of Orting Resolution No. 2015-15  
Appendix E – City of Orting Facilities Memo

# 1 Introduction

The City of Orting (City) is committed to providing equal access to its programs, services, and activities to all its residents. This Self-Evaluation and ADA Transition Plan (Plan) is a living document which will help guide planning and implementation for removing accessibility barriers within the City's jurisdiction. Public comments are always welcome and the City will update the Plan periodically.

## 2 Legal Requirements

The American with Disabilities Act (ADA) and the Rehabilitation Act of 1973, Section 504, requires cities with fewer than fifty employees, that is a recipient, or subrecipient, of federal financial assistance, to prepare a Self-Evaluation and ADA Program Access Plan. This document is a Self-Evaluation and ADA Transition Plan, which applies if the City employs more than fifty employees as well. The ADA also dictates that public entities must reasonably modify its policies, practices, and procedures to avoid discrimination against people with disabilities. WSDOT discusses these requirements in its Local Agency Guidelines (LAG) Manual (Wonch, 2022).

### 2.1 Legal Mandate

The ADA is a civil rights law for persons with disabilities that's purpose is to provide a "clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities." This law, passed in 1990, followed the Rehabilitation Act of 1973, and both combine to describe the City's responsibilities for ADA accessibility. This ADA Transition Plan is a requirement of the Rehabilitation Act, specifically Section 504, shown below.

*No otherwise qualified individual with a disability in the United States shall, solely by reason of his or her disability, be excluded from the participation in, be denied benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. This part applies to each recipient of Federal financial assistance from the Department of Transportation and to each program or activity that receives such assistance (Office of the Assistant Secretary for Administration & Management, n.d.).*

#### 2.1.1 Title I of the ADA

Title I of the ADA addresses employment practices and prohibits discriminating against qualified individuals with disabilities. This discrimination is prohibited in a number of areas, including but not limited to application processes, hiring, employment termination, promotion, compensation, and training. The City is an equal employment opportunity employer and complies with Title I (ADA, n.d.).

#### 2.1.2 Title II of the ADA

Title II of the ADA, which adopts much of Section 504 of the Rehabilitation Act of 1973, is addressed in this Plan. It prohibits the City from denying equal opportunity to services, programs, and activities to persons with disabilities. This prohibition applies whether the denial is direct or indirect (ADA, n.d.).

### 2.2 ADA Self-Evaluation and Transition Plan Requirements

This Plan is intended to provide a framework for the continuous improvement of City programs and facilities for people with disabilities. This Plan addresses facilities within the public right-of-way, especially curb ramps, and is intended to be updated as barriers are removed, programs change, and/or

new facilities come under control of the City. Programs offered by the City must be accessible to all people. The administrative requirements of this plan include:

- Designation of an ADA Coordinator responsible for overseeing Title II compliance,
- Development of an ADA grievance/complaint procedure,
- Completion of a self-evaluation of facilities, programs, and services,
- Development of a transition plan where the self-evaluation identifies any accessibility deficiencies.

This Plan identifies and makes recommendations to correct practices that result in limitations on access. As part of the self-evaluation, the City:

- Identifies the city's programs, activities, and services
- Reviews the policies, practices, and procedures that govern the administration of the City's programs, activities, and services
- Provides opportunity for public comment
- Makes the report available to the public
- Corrects any programs, activities, and services that are not consistent with the requirements

This Plan identifies barriers for people with disabilities and a schedule to remove these barriers over time and includes:

- A list of the physical barriers in the City's facilities that limit the accessibility of its programs, activities, or services to individuals with disabilities
- A detailed outline of the methods to be used to remove these barriers and make the facilities accessible
- A schedule for taking the steps necessary to achieve compliance with ADA Title II
- An opportunity for the public to provide comment on the transition plan
- The name of the individual responsible for the plan's implementation

This Plan is an assessment of the City's right-of-way facilities to find barriers to City programs for people with disabilities. The facilities with barriers have been identified and summarized in Chapter 3.

## 2.3 Public Involvement

The ADA requires the involvement of people with disabilities in the development and review of the ADA Self-Evaluation and Transition Plan. The city's public grievance policy is shown in Appendix D.

## 2.4 ADA Coordinator

The City Clerk was designated as the ADA Coordinator. This position is responsible for ensuring the accessibility of all programs, services, and activities of the City. The City's ADA Coordinator is:

Kim Agfalvi  
104 Bridge Street South  
Orting, WA 98360  
KAgfalvi@cityoforting.org  
(360) 893-9008

## 2.5 Requesting Accommodation

Requests may first be directed to the individual responsible for the program, activity, or service to which access is requested. If access is not accommodated, a formal complaint in writing should be made to the ADA Coordinator within 30 working days of the complainant becoming aware of the alleged violation. Reasonable accommodation to assist in completing this is available upon request. These requests should be made according to the City of Orting Resolution No. 2015-15, passed on November 25, 2015, and shown in Appendix D.

Requests for accommodation should include:

- The requestor's contact information (name, address, and telephone number)
- A brief description of the alleged violation
- A proposed accommodation or resolution

There is a City of Orting Public Access Request for Accommodation Form available, but it is not necessary.

## 2.6 Filing a Grievance

The City has a formal grievance procedure in place that was instituted in City of Orting Resolution No. 2015-15, passed on November 25, 2015. It is important to note that this grievance procedure does not preclude filing a complaint of discrimination with any appropriate state or federal agency, and that use of this grievance procedure is not a prerequisite in the pursuit of other remedies.

Step 1: Request accommodation from the individual responsible for the program, activity, or service to which access is requested.

Step 2: To file a grievance, make a formal complaint in writing to the ADA Coordinator within 30 working days of the complainant becoming aware of the alleged violation. This complaint should include the following information, and reasonable accommodation to assist in this is available upon request:

- Contact information for the person filing the grievance (full name, address, and phone number)
- The issue at hand, along with any other information that may support the grievance
- A proposed accommodation/resolution

There is a City of Orting Public ADA Complaint Form available for this purpose, but it is not necessary.

Step 2: The ADA Coordinator will conduct an informal, but thorough, review affording the complainant and the affected department(s) an opportunity to submit information relevant to the complaint and potential accommodation/resolution.

Step 3: A written response and description of the accommodations/resolutions, if any, will be issued by the ADA Coordinator and sent to the complainant within 30 calendar days after the complaint is received. If the complexities of the complaint require additional time, the complainant will be notified. The accommodation or resolution may not be the same as requested.

Step 4: The complainant may request a reconsideration of the case determination by submitting a request for reconsideration within ten (10) working days following the date the complainant receives the City's response.

Step 5. The Mayor or his or her designee will conduct his/her review of the complaint and issue his/her decision to the complainant within twenty (20) working days of receiving the request for reconsideration, unless the complexities of the complaint require additional time. The Mayor and/or his or her designee's decision is final.

Step 6. The City Clerk will maintain the files and records of the City of Orting related to ADA complaints filed and keep a log of complaints. The log shall include:

- a. The name and address of the person filing the complaint;
- b. The date of the complaint;
- c. The basis of the complaint;
- d. The disposition of the complaint.

## 2.7 Undue Burden

If the City can demonstrate that an action would result in a fundamental alteration in the nature of its program or activity, would create a direct threat to the participant or others, or would represent an undue financial and administrative burden, it is not required to take it. This determination must be based on an evaluation of all resources available for use in the city and alternative solutions must be examined.

## 2.8 Public Outreach

This Plan has been posted on the City's website, with the goal of receiving input and comments from the general public. These comments should be directed to the ADA Coordinator. This plan will be updated once per year to show completed projects as well as comments or changes suggested by the public as appropriate.

## 2.9 State and Local Requirements

Facilities in the public right of way must be compliant with the 2011 Public Right-of-Way Accessibility Guidelines (PROWAG) to the maximum extent feasible (U.S. Access Board, 2013).

## 2.10 Public Notice Requirements

The City's ADA provisions and grievance/complaint procedures are required to be posted both internally and externally. Posting on the City's website counts as external posting. The ADA provisions shall contain a brief description of how ADA accessibility is addressed in its employment, communications, policies, and resolution of complaints. Both ADA provisions and grievance/complaint procedures must be made available in alternative formats that address the needs of persons with disabilities.

## 3 Self-Evaluation of Policies, Procedures, and Programs

### 3.1 Introduction

Programs, services, and activities offered by the City must be accessible for all people to the maximum extent feasible. This section details the review of current Public Works policies and programs. The findings and recommendations contained in this section will serve as a basis for the implementation of specific improvements for providing access to City programs as required by the ADA.

### 3.2 Programmatic Modification

The ADA Coordinator, or designee, will follow-up with department staff to review the recommendations in this section. The ADA Coordinator, or designee, will coordinate with needed parties on the removal of barriers to accessibility when they are found.

### 3.3 Self-Evaluation Findings

#### 3.3.1 Public Right of Way

##### 3.3.1.1 City Facilities, Streets, and Parks

Publicly accessible facilities were evaluated for this plan and the results are shown in Appendix E. A summary of these findings follows:

The buildings evaluated were found to be sufficiently accessible. The parks evaluated needed a few updates to be accessible, generally maintenance on paths, playground surfacing, and accessible routes to sporting facilities and playgrounds. Several parks need updates for ADA accessible toilet rooms and ADA parking spots.

##### 3.3.1.2 Public Streets and Curb Ramps

Facilities evaluated for this Plan include curb ramps, pedestrian activated signals, and sidewalks. The facilities were evaluated over a month-long period in early 2023 (March to April) with several follow up surveys using criteria from the PROWAG. These facilities were evaluated both in the field and using Google Street View, and the results are compiled in a GIS database. Of the City's approximately 605 existing curb ramps, 104 were found to be compliant with the PROWAG as shown in Figure 1. Of the 501 non-compliant curb ramps, 28 are missing the detectable warning strip (DWS), and the remainder, 473, need to be completely replaced because elements of the curb ramp do not meet width or grade standards.

Sidewalks were evaluated around parks and facilities, and three were found to be inaccessible as shown in Figure 1, Figure 2, and Appendix C. Sidewalks should continue to be evaluated with future roadway projects and based on the complaint form then prioritized following section 4.2.



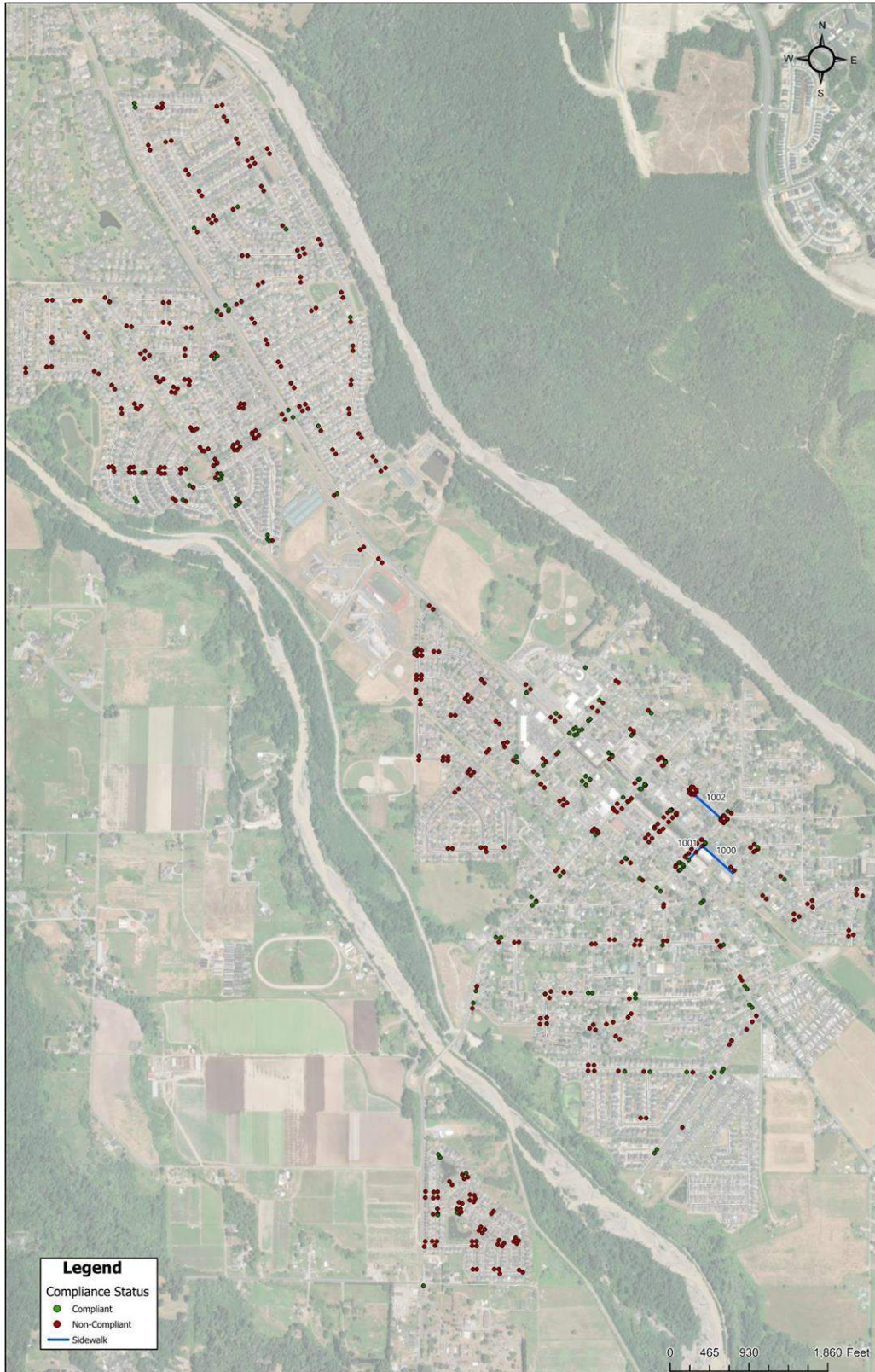


Figure 1. Curb Ramps Labeled by ADA Compliance



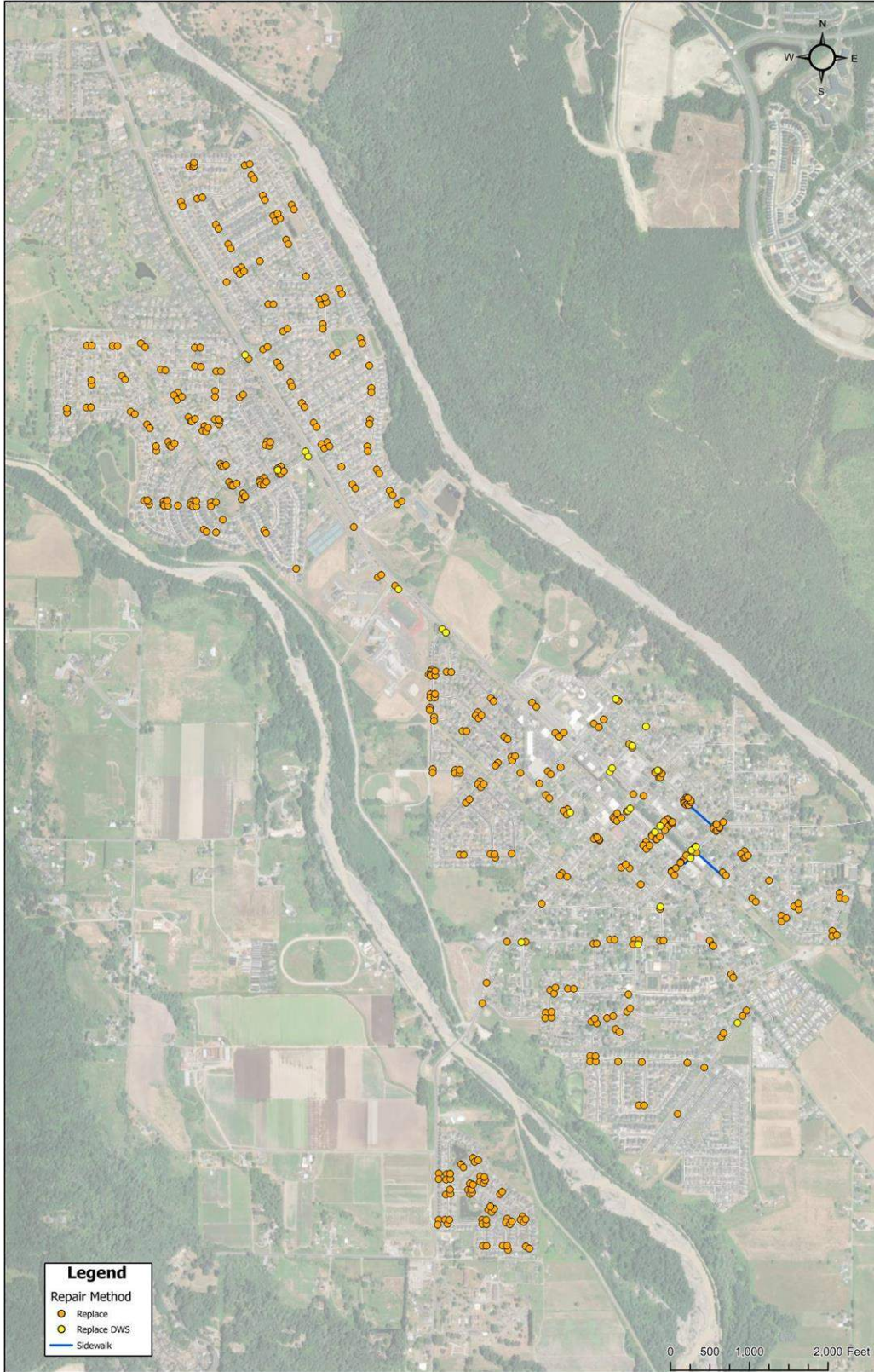


Figure 2. Noncompliant Curb Ramps labeled by Repair Method Needed



### 3.3.2 Programs, Services, and Activities

#### 3.3.2.1 Public Meetings, Hearings, and Events

The city works hard to ensure its public meetings, hearings, and events are open and accessible to all citizens, regardless of disability.

- The first city council meeting of each month is taped and replayed on PCTV (Comcast channel 22) and Comcast On-Demand.
- All regular council and council committee meetings are open to the public.
- Accessibility complaints for these meetings can be voiced through the city ADA grievance policy in City of Orting Resolution No. 2015-15, passed on November 25, 2015.
- Requests for accessibility should be made as soon with the person or department that scheduled the event as possible and no later than 72 hours before the scheduled event. If it is not known who to contact, the ADA coordinator may be contacted (City of Orting, n.d.).

#### 3.3.2.2 Printed Materials

The City will, upon request, attempt to provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in the City's programs, services and activities.

- These requests should go through the person responsible for the program, service, or activity before following the ADA accommodation request procedure.

#### 3.3.2.3 Website

The City's website includes accessibility features such as the ability to adjust font size, links to free viewers for attached documents, and the ability to print or provide feedback on specific pages.

The website should display the ADA Title II Complaint form and ADA Grievance form in an easily accessible manner. In addition, this plan should be accessible from the website. Finally, the maintenance request form currently on the website should be fixed and reuploaded along with this plan to allow for public input on curb ramps and a reprioritization of curb ramps to address if necessary. The city is currently working on uploading these forms to their website, and links will be shown in this section once they are uploaded.

#### 3.3.2.4 Contracting/Purchasing

The City generally awards contracts based upon the lowest responsive and responsible bid per RCW 39.04.350, which qualifies as criteria that does not discriminate based on disability.

The City should include language in all of its bid solicitation documents explaining that the contractor must comply with Equal Employment Opportunity regulations.

#### 3.3.2.5 Emergency Management Programs

The City has a number of emergency management programs, some in conjunction with Pierce County. Although they are governed by the same ADA Title II Complaint form and Grievance process as the rest of the City's programs, more information should be posted to the website about how they apply to all citizens regardless of disability.

### 3.3.2.6 Staff Training and Employment

The City's Personnel Policies & Procedures Manual contains information about the ADA as it relates to employees (City of Orting, n.d.). Included in this manual is information about requesting reasonable accommodations and the City's commitment to providing them.

## 4 ADA Transition Plan

### 4.1 Introduction

According to the ADA, localities that receive financial aid from the federal government and have less than fifty employees are required to create a Self-Evaluation and ADA Program Access Plan, although this document is a Self-Evaluation and ADA Transition Plan and also applies if the city employs more than 50 employees. Public institutions are required by the ADA to make reasonable modifications to their policies, practices, and procedures in order to prevent discrimination against individuals with disabilities. This Plan is a dynamic document that outlines the programmatic steps the City will take to remove all barriers to accessibility under its purview. This plan complies with Section 504 of the Rehabilitation Act's standards as well as the ADA's requirements for accessibility to public programs, services, and activities.

### 4.2 Prioritization of Barrier Removal

Removal of barrier prioritization will follow the methods laid out by WSDOT (Watkinson, 2018). They are:

#### Highest Priority

- Priority identified through public input or complaints received, and
- Areas with high concentrations of populations with disabilities (based on Census data),
- Intersections and roadway segments serving facilities including:
  - Government offices
  - Public schools
  - Hospitals, health clinics and health centers
  - Transit facilities (includes bus stops)

#### Second Highest Priority

- Areas with medium/mid-range concentrations of populations with disabilities (based on Census data)
- Intersections and roadway segments serving facilities including:
  - Public housing
  - Sports arenas
  - Licensing offices
  - Libraries
  - Shopping malls
  - Supermarkets
  - Strip retail centers
  - Other major employment sites

### Third Highest Priority

- Areas with lower/low-range concentrations of populations with disabilities (based on Census data),
- Intersections and roadway segments serving facilities including:
  - Industrial areas
- Other areas not classified as high or medium priority

## 4.3 Barrier Removal Schedule

The barrier removal schedule includes all noncompliant ramps and is organized by the priority of each curb ramp. Curb ramp reference numbers, locations, repair method(s), and cost estimates are included for each project area, generally an intersection. This schedule should be used as a planning tool and further inspection may be required to determine if a full curb ramp replacement will be necessary based on future degradation. The estimates below include both DWS and curb ramp replacement.

**Table 1. Highest Priority Curb Ramps**

ID No.	Location (Highest Priority)	Repair Method	Estimated Cost (in 2024 dollars)
165-166	Lane Blvd & Washington Ave	2 DWS replacements	\$2,400
214-215	Washington Ave N & Rocky Rd NE	2 full replacements	\$0*
225-226	Ptarmigan Ridge Elementary	2 DWS replacements	\$2,400
227-228	Old Pioneer Way & Washington Ave	2 DWS replacements	\$2,400
229-230	Washington Ave & Whitehawk Blvd	2 DWS replacements	\$2,400
231-238	Whitehawk Blvd & Corrin Ave	8 full replacements	\$88,000
239-242	Whitehawk Blvd & Eldridge Ave	4 full replacements	\$44,000
292-293 & 297	Washington Ave & Whitesell St	3 full replacements	\$33,000
299	Whitesell St. & Rainer Ln	1 full replacement	\$11,000
300-301	Whitesell St. & Varner Ave	2 full replacements	\$22,000
588-591	Washington Ave and High School	4 full replacements	\$44,000
592 & 594	Washington Ave and High School	2 full replacements	\$22,000
598 & 599	Orting City Hall	2 DWS replacements	\$2,400
600 & 601	Washington Ave and High School	2 full replacements	\$22,000

\*the curb ramps at this location will be superseded (replaced) by the pedestrian bridge project on Washington Ave.

**Table 2. Second Highest Priority Curb Ramps**

ID No.	Location (2 <sup>nd</sup> Highest Priority)	Repair Method	Estimated Cost (in 2024 dollars)
285	Whitesell St & Eldredge Ave	1 full replacement	\$11,000
287-289	Whitesell St & Corrin Ave	3 full replacements	\$33,000
290-291	Whitesell St & Scoyoc Ave	2 full replacements	\$22,000
305 – 306	Leber St & Varner Ave	2 full replacements	\$22,000
307 – 308	Leber St & Varner Ave	2 DWS replacements	\$2,400
316 & 318	Leber St & Washington Ave	2 DWS replacements	\$2,400
321 – 324	Corrin Ave & Leber St	4 full replacements	\$44,000
331 – 335	Corrin Ave & Calistoga St	5 full replacements	\$55,000
336 – 337	Van Scoyoc Ave & Calistoga St	2 full replacements	\$22,000
338-339	Van Scoyoc Ave & Calistoga St	2 DWS replacements	\$2,400
341	Washington Ave & Calistoga St	1 full replacement	\$11,000
369-370 & 372-376	Washington Ave & Calistoga St	7 full replacements	\$77,000
377-386	Varner Ave & Calistoga St	10 full replacements	\$110,000
436-441	Washington Ave & River Ave	6 full replacements	\$66,000
595	Rainer Lane & Calistoga St	1 full replacement	\$11,000

**Table 3. Lowest Priority Curb Ramps**

ID No.	Location (Lowest Priority)	Repair Method	Estimated Cost (in 2024 dollars)
3-8	Ames St NE Midblock	6 full replacements	\$66,000
9-10	Burr St & Riddell Ave	2 full replacements	\$22,000
11-12	Burr St & Hardtke Ave	2 full replacements	\$22,000
13-14	Burr St & Hansberry Ave	2 full replacements	\$22,000
15-16	Fielding St & Hardtke Ave	2 full replacements	\$22,000
17-18	Fielding St & Hansberry Ave	2 full replacements	\$22,000
19-20	Gipple St & Hardtke Ave	2 full replacements	\$22,000
21-24	Gipple St & Hansberry Ave	4 full replacements	\$44,000
25-26	Gipple St & Daffodil Ave	2 full replacements	\$22,000
28	Johns St & Riddell Ave	1 full replacement	\$11,000
29-32	Johns St & Kendall St	4 full replacements	\$44,000
33	Johns St & Michell Lane	1 full replacement	\$11,000
35-36	Johns St & Hansberry Ave	2 full replacements	\$22,000
37	Michell Lane & Hansberry Ave	1 full replacement	\$11,000
39-40	Kendall St & Hardtke Ave NE	2 full replacements	\$22,000

ID No.	Location (Lowest Priority)	Repair Method	Estimated Cost (in 2024 dollars)
41-44	Kendall St & Hansberry Ave	4 full replacements	\$44,000
45-46	Kendall St & Daffodil Ave	2 full replacements	\$22,000
47-48	Williams Blvd & Hardtke Ave NE	2 full replacements	\$22,000
49-50	Williams Blvd & Hansberry Ave	2 full replacements	\$22,000
51-52	Williams Blvd & Washington Ave	2 full replacements	\$22,000
56- 57	Williams Blvd & Riddell Ave	2 full replacements	\$22,000
58-59	Lawson Ct & Riddell Ave	2 full replacements	\$22,000
60-61	Mazza St & Hansberry Ave	2 full replacements	\$22,000
62-63	Mazza St & Riddell Ave	2 full replacements	\$22,000
64-65	Mazza Sr & Daffodil Ave	2 full replacements	\$22,000
66-67	Nelsen St & Riddell Ave	2 full replacements	\$22,000
69	Nelsen St & Daffodil Ave	1 full replacement	\$11,000
70-71	Roberts St & Riddell Ave	2 full replacements	\$22,000
72-73	Roberts St & Daffodil Ave	2 full replacements	\$22,000
74-75	Lane Blvd & Daffodil Ave	2 full replacements	\$22,000
76-79	Lane Blvd & Riddell Ave	4 full replacements	\$44,000
81	Silvernail St & Riddell Ave	1 full replacement	\$11,000
82-83	Silvernail St & Daffodil Ave	2 full replacements	\$22,000
84-85	Voss St & Riddell Ave	2 full replacements	\$22,000
86-87	Voss St & Daffodil Ave	2 full replacements	\$22,000
88-89	Weaver St & Daffodil Ave	2 full replacements	\$22,000
90-91	Rocky Rd & Daffodil Ave	2 full replacements	\$22,000
92-93	Williams Ct & Williams St	2 full replacements	\$22,000
94-95	Mellinger Ave & Williams St	2 full replacements	\$22,000
96-97	Mellinger Ave & Stone St	2 full replacements	\$22,000
98-99	Mellinger Ave & Williams Blvd NW	2 full replacements	\$22,000
100-101	Headley Ave & Williams Blvd NW	2 full replacements	\$22,000
102-103	Headley Ave & Stone St	2 full replacements	\$22,000
104-105	Noble Ave NW & Williams Blvd NW	2 full replacements	\$22,000
106-107	Headley Ave & Williams St	2 full replacements	\$22,000
108- 109	Nunnally Ave & Williams Blvd NW	2 full replacements	\$22,000
110-111	Jurin Ave & Whitley St	2 full replacements	\$22,000
112-113	Jurin Ave & Williams Blvd NW	2 full replacements	\$22,000
114-117	Anderson St & Nunnally Ave	4 full replacements	\$44,000
118-119	Anderson St & Williams St	2 full replacements	\$22,000
120-121	Anderson St & Boatman Ave	2 full replacements	\$22,000
122-123	Ozzie St & Williams St	2 full replacements	\$22,000
124-127	Ozzie St & Van Ogle Lane	4 full replacements	\$44,000
128-131	Ozzie St & Nunnally Ave	4 full replacements	\$44,000

ID No.	Location (Lowest Priority)	Repair Method	Estimated Cost (in 2024 dollars)
132-135	Cloud St & Nunnally Ave	4 full replacements	\$44,000
136-139	Cloud St & Nunnally Ave	4 full replacements	\$44,000
140 & 143	Sigafoos Ave NW & Ross Ave NW	2 full replacements	\$22,000
144-146	Spangler St & Williams St	3 full replacements	\$33,000
147	Spangler St & Williams St	1 DWS replacement	\$1,200
148-153	Spangler St & Van Ogle Lane	6 full replacements	\$66,000
154-157	Sigafoos Ave & Ross Ave	4 full replacements	\$44,000
158-163	Spangler St & O Farrell Lane	5 full replacements	\$55,000
168-173	Lane Blvd & Sigafoos Ave	5 full replacements	\$55,000
174-179	Lane Blvd & Boatman Ave	6 full replacements	\$66,000
180-183	Lane Blvd & Nunnally Ave	4 full replacements	\$44,000
184-187	Nunnally Ave & O Farrell Lane	4 full replacements	\$44,000
188-191	Nunnally Ave & Colorossi Cir	4 full replacements	\$44,000
193	Spangler St & Antonie Lane	1 full replacement	\$11,000
194-197	Spangler St & Colorossi Cir	4 full replacements	\$44,000
199	Geels Way & Colorossi Cir	1 full replacement	\$11,000
206-207	Boatman Ave & Williams Blvd NW	2 full replacements	\$22,000
210-211	Antonie Ln & O Farrell Lane	2 full replacements	\$22,000
213	Geels Way & O Farrell Lane	1 full replacement	\$11,000
216 & 220	Boatman Ave & Louise Wise Ave	2 full replacements	\$22,000
224	Sigafoos Ave & Louise Wise Ave	1 full replacement	\$11,000
243-244	Whitehawk Blvd & Service Rd	2 full replacements	\$22,000
245-246	Corrin Ave & Corrin Ct	2 full replacements	\$22,000
247-248	Whitehawk Blvd & Whitehawk Ct	2 full replacements	\$22,000
249-250	Whitehawk Blvd & Orting Ave	2 full replacements	\$22,000
251-252	Corrin Ave & Rowe St	2 full replacements	\$22,000
253-256	Eldredge Ave & Rowe St	4 full replacements	\$44,000
257-258	Kensington Ave & Rowe St	2 full replacements	\$22,000
259-262	Orting Ave & Orting Ct	4 full replacements	\$44,000
263-264	Eldredge Ave & Callendar Ct	2 full replacements	\$22,000
265-267	Eldredge Ave & Callendar St	3 full replacements	\$33,000
268-269	Kensington Ave & Callendar St	2 full replacements	\$22,000
270-273	Orting Ave & Callendar St	4 full replacements	\$44,000
274-275	Thompson Ave & Callendar St	2 full replacements	\$22,000
276-277	Groff Ave & Burnett Ct	2 full replacements	\$22,000
278-280	Groff Ave & Thompson Ave	3 full replacements	\$33,000
281	Groff Ave & Orting Ave	1 full replacement	\$11,000
282-284	Eldredge Ave & Eldredge Ct	3 full replacements	\$33,000
302	Bowlin Ave & Parker Lane	1 full replacement	\$11,000

ID No.	Location (Lowest Priority)	Repair Method	Estimated Cost (in 2024 dollars)
303-304	Bowlin Ave & Whitesell St	2 full replacements	\$22,000
309	Eldredge Ave & Whitesell Ct	1 DWS replacement	\$1,200
310	Eldredge Ave & Whitesell Ct	1 full replacement	\$11,000
311 & 313	Eldredge Ave & Leber Ct	2 full replacements	\$22,000
312 & 314	Eldredge Ave & Leber Ct	2 DWS replacements	\$2,400
319	Bowlin Ave & Leber St	1 DWS replacement	\$1,200
320	Bowlin Ave & Leber St	1 full replacement	\$11,000
325-326, 328-330	Eldredge Ave & Calistoga St	5 full replacements	\$55,000
347	Varner Ave & Calistoga St	1 DWS replacement	\$1,200
348-351	Varner Ave & Calistoga St	4 full replacements	\$44,000
353-354	Varner Ave & Calistoga St	2 full replacements	\$22,000
356-357	Eldredge Ave & Train St	2 DWS replacements	\$2,400
358	Eldredge Ave & Train St	1 full replacement	\$11,000
359-362	Corrin Ave & Train St	4 full replacements	\$44,000
363-367	Van Scoyoc Ave & Train St	5 full replacements	\$55,000
368	Van Scoyoc Ave & Train St	1 DWS replacement	\$1,200
388	Eldredge Ave & Taylor St	1 full replacement	\$11,000
389	Eldredge Ave & Taylor St	1 DWS replacement	\$1,200
390-391 & 393	Tacoma Ave & Calistoga St	3 full replacements	\$33,000
397	Deeded Lane & Calistoga St	1 full replacement	\$11,000
398-399	Kansas St & Calistoga St	2 full replacements	\$22,000
401-402	Kansas St & Coe Lane	2 full replacements	\$22,000
403-404	Kansas St & Ford Lane	2 full replacements	\$22,000
405-406	Kansas St & Hays Ave	2 full replacements	\$22,000
407-410	Kansas St & Grinnell Ave	4 full replacements	\$44,000
411-413	Kansas St & Eldredge Ave	3 full replacements	\$33,000
415	Eldredge Ave & River Ave	1 full replacement	\$11,000
416	Deeded Lane & Eldredge Ave	1 DWS replacement	\$1,200
417	Deeded Lane & Eldredge Ave	1 full replacement	\$11,000
419	Corrin Ave & Harman Way	1 full replacement	\$11,000
420-422	Kansas St & Harman Way	3 full replacements	\$33,000
425-427 & 431	Corrin Ave & River Ave	4 full replacements	\$44,000
432-435	Van Scoyoc Ave & River Ave	4 full replacements	\$44,000
442 & 444	Varner Ave & River Ave	2 full replacements	\$22,000
443 & 445	Varner Ave & River Ave	2 DWS replacements	\$2,400



ID No.	Location (Lowest Priority)	Repair Method	Estimated Cost (in 2024 dollars)
446-449	Varner Ave & River Ave	4 full replacements	\$44,000
450-451	Bridge St & River Ave	2 full replacements	\$22,000
452-453	Washington Ave & Hardefeldt St	2 full replacements	\$22,000
454-458	Varner Ave & Hardefeldt St	5 full replacements	\$55,000
460-461	Washington Ave & Olive St	2 full replacements	\$22,000
462	Varner Ave & Olive St	1 full replacement	\$11,000
464-466	Washington Ave & Brown St	3 full replacements	\$33,000
467-469	Varner Ave & Brown St	3 full replacements	\$33,000
470-472	Washington Ave & Brown Way	3 full replacements	\$33,000
473-475	Brown St & Brown Way	3 full replacements	\$33,000
476	Skinner Way & Calistoga St	1 full replacement	\$11,000
478-481	Skinner Way & Belfair Ave	4 full replacements	\$44,000
482-484	Belfair Ave & Johnson Ct	3 full replacements	\$33,000
485-486	Belfair St & Cammarano Ct	2 full replacements	\$22,000
487-488	Belfair St & Ford Lane	2 full replacements	\$22,000
489	Belfair St & Grinnell Ave	1 full replacement	\$11,000
492-494	Skinner Way & Grinnell Ave	3 full replacements	\$33,000
495-496	Coplan St & Grinnell Ave	2 full replacements	\$22,000
497-498	Coplan St & Coplan Ct	2 full replacements	\$22,000
499-500	Icey St & Grinnell Ave	2 full replacements	\$22,000
501-504	Balmer St & Grinnell Ave	4 full replacements	\$44,000
505	Balmer St & Koehler Ave	1 full replacement	\$11,000
507	Balmer St & Carrier Ave	1 full replacement	\$11,000
509-510	Buell St & Carrier Ave	2 full replacements	\$22,000
515	Park Pl & Beckett Lane	1 DWS replacement	\$1,200
516	Balmer St & Beckett Lane	1 full replacement	\$11,000
519	Maple Lane & Beckett Lane	1 full replacement	\$11,000
520-521	McMahon Lane & Beckett Lane	2 full replacements	\$22,000
522-523	BTWN McMahon Lane & Harman Way	2 full replacements	\$22,000
525-527	Harrison Lane & Harman Way	3 full replacements	\$33,000
528-529	Erickson Lane & Harman Way	2 full replacements	\$22,000
530	Harman Way & Beckett Lane	1 full replacement	\$11,000
531-532	Robin St & Calistoga Ave	2 full replacements	\$22,000
534-536	Robin St & Eagle Ave	3 full replacements	\$33,000
537-540	Robin St & Blue Jay Ave	4 full replacements	\$44,000
541-544	Hawk Ave & Blue Jay Ave	4 full replacements	\$44,000
545-547 & 602	Mockingbird St & Eagle Ave	4 full replacements	\$44,000
548-549	Cardinal St & Calistoga Ave	2 full replacements	\$22,000



ID No.	Location (Lowest Priority)	Repair Method	Estimated Cost (in 2024 dollars)
550-553	Cardinal St & Eagle Ave	4 full replacements	\$44,000
556-558	Cardinal St & Phoenix Ave	3 full replacements	\$33,000
560-563	Hawk Ave & Goldfinch Ave	4 full replacements	\$44,000
564-565	Starling St & Blue Jay Ave	2 full replacements	\$22,000
566-568	Starling St & Quail Ave	3 full replacements	\$33,000
569-570	Starling St & Goldfinch Ave	2 full replacements	\$22,000
571 & 573-575	Hawk Ave & Mockingbird St	4 full replacements	\$44,000
576-577	Hawk Ave BTW Phoenix Ave & Mockingbird St	2 full replacements	\$22,000
578-581 & 605	Hawk Ave & Phoenix Ave	5 full replacements	\$55,000
582-583	Hawk Ave BTW Phoenix Ave & Goldfinch Ave	2 full replacements	\$22,000
584	Williams Blvd & Washington Ave	1 full replacement	\$11,000
603-604	Cardinal St & Eagle Ave	2 full replacements	\$22,000
606-609	Hawk Ave & Quail Ave	4 full replacements	\$44,000

#### 4.4 Curb Ramp Barrier Removal Triggers

Curb ramps are sorted first into two categories, compliant and noncompliant. Compliant ramps will remain, while noncompliant ramps are sorted into two further categories, replace or replace detectable warning strip (DWS). This is based on if the barrier is due to the characteristics of the ramp or the DWS.

Ramps found to be non-compliant may have elements that are compliant and can be preserved in order to reduce cost. However, the cost to benefit analysis of what elements are to remain should be conducted prior to bidding any ramp reconstruction work, to verify compliance when constructed.

#### 4.5 Barrier Removal Budget

The city's budget of \$65,000 per year for the ADA Compliance Annual Program allows for 5 curb ramps to be replaced each year (see Appendix B for a detailed breakdown). Grant opportunities, such as Safe Routes to School, as well as including curb ramp replacements with roadway projects will allow for more curb ramps to be replaced each year without increasing the city's budget. Roadway maintenance projects, in particular reconstructions and overlays, should be planned with ADA repairs in mind as they may necessitate reconstruction of ADA facilities.

# Appendix A

## References

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# Appendix B

Estimate

City of Orting - 2024 ADA Replacement Estimate  
Costs per Year

Year #	Year	Cost
1	2024	\$55,000
2	2025	\$57,000
3	2026	\$59,000
4	2027	\$62,000
5	2028	\$64,000
6	2029	\$66,000

Year #	1
Year	2024
Years of Escalation	0
CONSTRUCTION SUBTOTAL (2024)	\$25,000
DESIGN CONTINGENCY (30%)	<u>\$7,500</u>
SUBTOTAL	<u>\$32,500</u>
INFLATION/YR (3%)	\$32,500
TOTAL CONSTRUCTION + ROW (INFLATED)	\$32,500
PERMITTING (5%)	\$1,625
DESIGN (25%)	\$8,125
CITY PM/ADMINISTRATION (5%)	\$1,625
CONSTRUCTION MANAGEMENT (25%)	\$8,125
MANAGEMENT RESERVE (10%)	\$3,250

<b>TOTAL COST</b>	<b>\$363,000</b>
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<b>CONSTRUCTION GRAND TOTAL</b>	<b>\$55,000</b>
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City of Orting - 2024 ADA Replacement Estimate  
Costs per Year

Year #	2	Year #	3
Year	2025	Year	2026
Years of Escalation	1	Years of Escalation	2
CONSTRUCTION SUBTOTAL (2024)	\$25,000	CONSTRUCTION SUBTOTAL (2024)	\$25,000
DESIGN CONTINGENCY (30%)	<u>\$7,500</u>	DESIGN CONTINGENCY (30%)	<u>\$7,500</u>
SUBTOTAL	<u>\$32,500</u>	SUBTOTAL	<u>\$32,500</u>
INFLATION/YR (3%)	\$33,475	INFLATION/YR (3%)	\$34,479
TOTAL CONSTRUCTION + ROW (INFLATED)	\$33,475	TOTAL CONSTRUCTION + ROW (INFLATED)	\$34,479
PERMITTING (5%)	\$1,674	PERMITTING (5%)	\$1,724
DESIGN (25%)	\$8,369	DESIGN (25%)	\$8,620
CITY PM/ADMINISTRATION (5%)	\$1,674	CITY PM/ADMINISTRATION (5%)	\$1,724
CONSTRUCTION MANAGEMENT (25%)	\$8,369	CONSTRUCTION MANAGEMENT (25%)	\$8,620
MANAGEMENT RESERVE (10%)	\$3,348	MANAGEMENT RESERVE (10%)	\$3,448
<b>CONSTRUCTION GRAND TOTAL</b>	<b>\$57,000</b>	<b>CONSTRUCTION GRAND TOTAL</b>	<b>\$59,000</b>

City of Orting - 2024 ADA Replacement Estimate  
Costs per Year

Year #	4	Year #	5
Year	2027	Year	2028
Years of Escalation	3	Years of Escalation	4
CONSTRUCTION SUBTOTAL (2024)	\$25,000	CONSTRUCTION SUBTOTAL (2024)	\$25,000
DESIGN CONTINGENCY (30%)	<u>\$7,500</u>	DESIGN CONTINGENCY (30%)	<u>\$7,500</u>
SUBTOTAL	<u>\$32,500</u>	SUBTOTAL	<u>\$32,500</u>
INFLATION/YR (3%)	\$36,579	INFLATION/YR (3%)	\$37,676
TOTAL CONSTRUCTION + ROW (INFLATED)	\$36,579	TOTAL CONSTRUCTION + ROW (INFLATED)	\$37,676
PERMITTING (5%)	\$1,829	PERMITTING (5%)	\$1,884
DESIGN (25%)	\$9,145	DESIGN (25%)	\$9,419
CITY PM/ADMINISTRATION (5%)	\$1,829	CITY PM/ADMINISTRATION (5%)	\$1,884
CONSTRUCTION MANAGEMENT (25%)	\$9,145	CONSTRUCTION MANAGEMENT (25%)	\$9,419
MANAGEMENT RESERVE (10%)	\$3,658	MANAGEMENT RESERVE (10%)	\$3,768
<b>CONSTRUCTION GRAND TOTAL</b>	<b>\$62,000</b>	<b>CONSTRUCTION GRAND TOTAL</b>	<b>\$64,000</b>

City of Orting - 2024 ADA Replacement Estimate  
Costs per Year

Year #	6
Year	2029
Years of Escalation	5
CONSTRUCTION SUBTOTAL (2024)	\$25,000
DESIGN CONTINGENCY (30%)	<u>\$7,500</u>
SUBTOTAL	<u>\$32,500</u>
INFLATION/YR (3%)	\$38,807
TOTAL CONSTRUCTION + ROW (INFLATED)	\$38,807
PERMITTING (5%)	\$1,940
DESIGN (25%)	\$9,702
CITY PM/ADMINISTRATION (5%)	\$1,940
CONSTRUCTION MANAGEMENT (25%)	\$9,702
MANAGEMENT RESERVE (10%)	\$3,881
<b>CONSTRUCTION GRAND TOTAL</b>	<b>\$66,000</b>

Project Development Level	Design			Design	City PM/Admin	Construction Management	Management Reserve
	Contingency	Inflation/yr	Permitting				
Planning (<\$250k)	50%	3%	5%	25%	5%	25%	10%
Planning (\$250k-\$1M)	30%	3%	5%	15%	3%	15%	10%
Planning (>\$1M)	30%	3%	5%	12%	3%	15%	10%
30% Design (<\$250k)	30%	3%	5%	25%	5%	25%	10%
30% Design (\$250k-\$1M)	20%	3%	5%	15%	3%	15%	10%
30% Design (>\$1M)	20%	3%	5%	12%	3%	15%	10%
60% Design (<\$250k)	20%	3%	N/A	N/A	5%	25%	10%
60% Design (\$250k-\$1M)	10%	3%	N/A	N/A	3%	15%	10%
60% Design (>\$1M)	10%	3%	N/A	N/A	3%	15%	10%
90% Design (<\$250k)	N/A	3%	N/A	N/A	5%	25%	10%
90% Design (\$250k-\$1M)	N/A	3%	N/A	N/A	3%	15%	10%
90% Design (>\$1M)	N/A	3%	N/A	N/A	3%	15%	10%
Final Design (<\$250k)	N/A	3%	N/A	N/A	5%	25%	10%
Final Design (\$250k-\$1M)	N/A	3%	N/A	N/A	3%	15%	10%
Final Design (>\$1M)	N/A	3%	N/A	N/A	3%	15%	10%

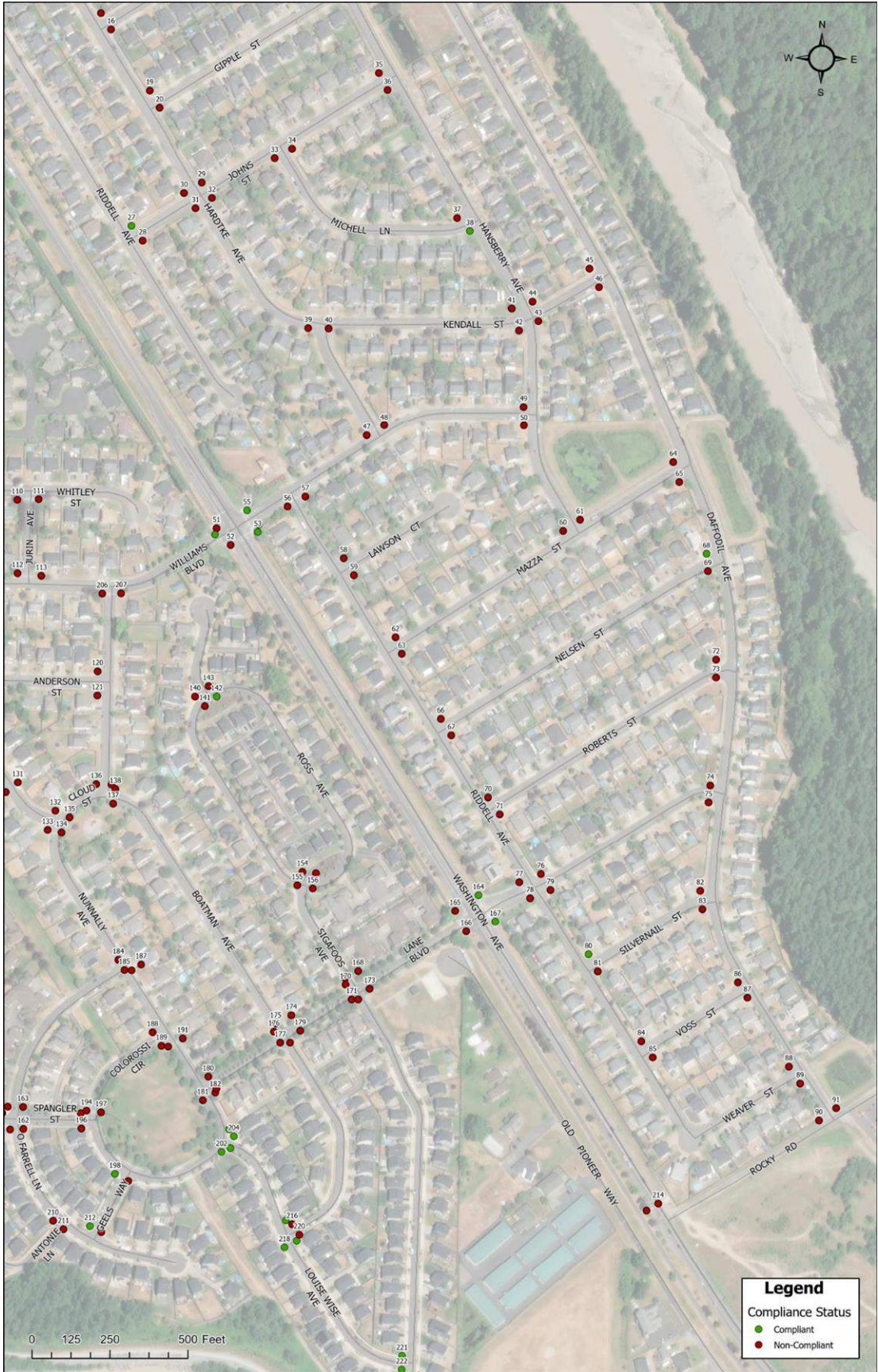


# Appendix C

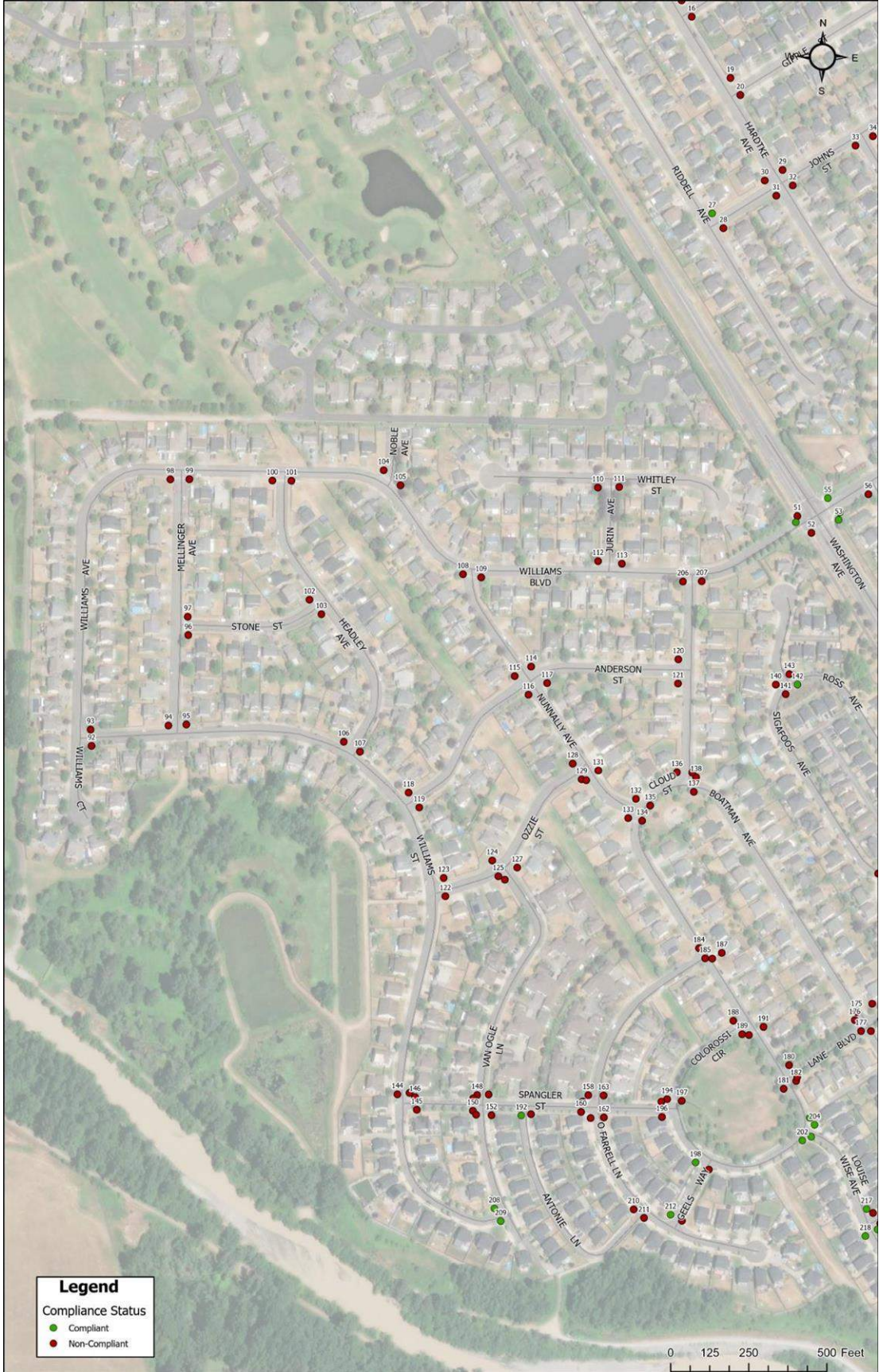
## Zoomed In Maps



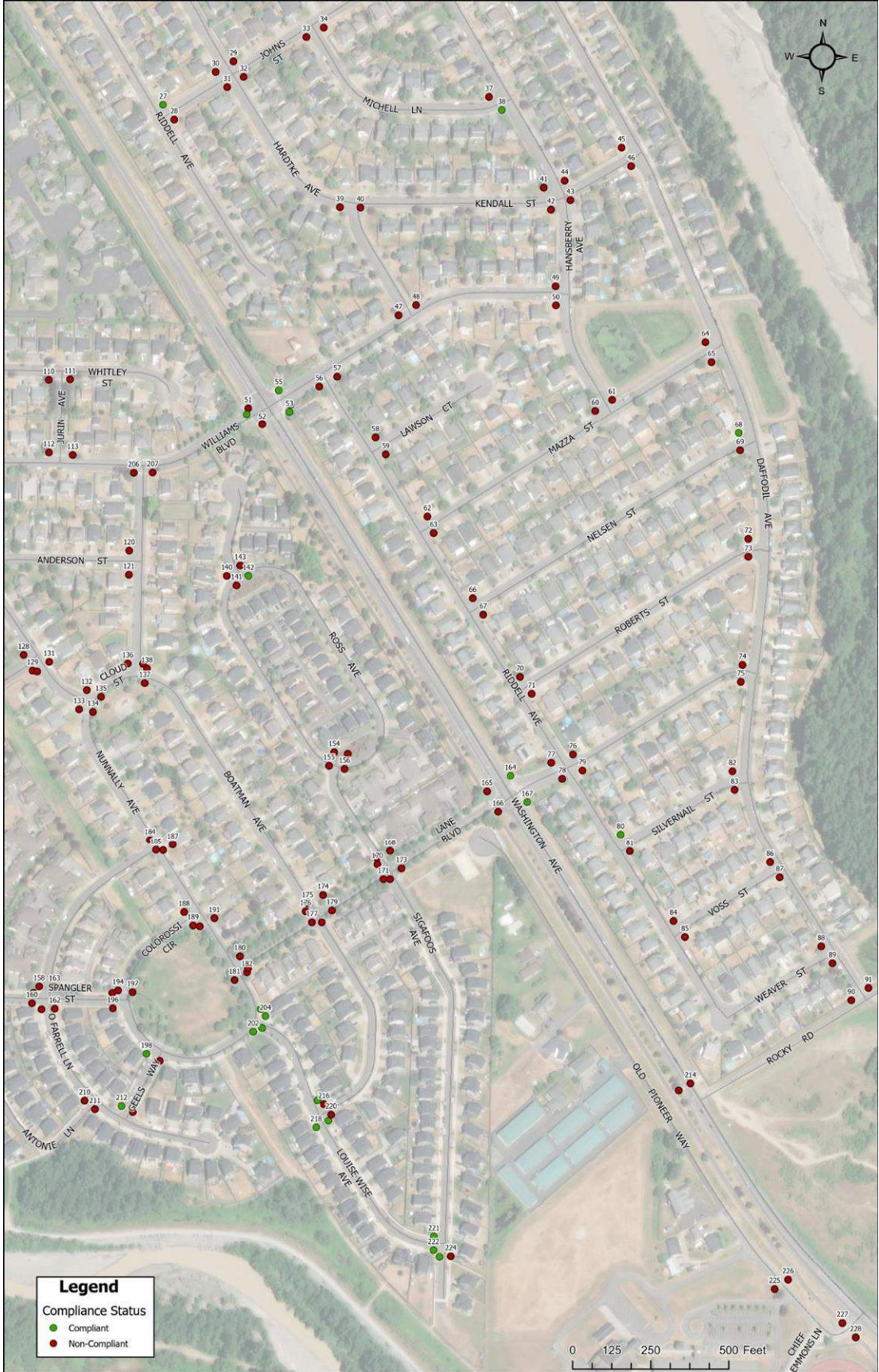




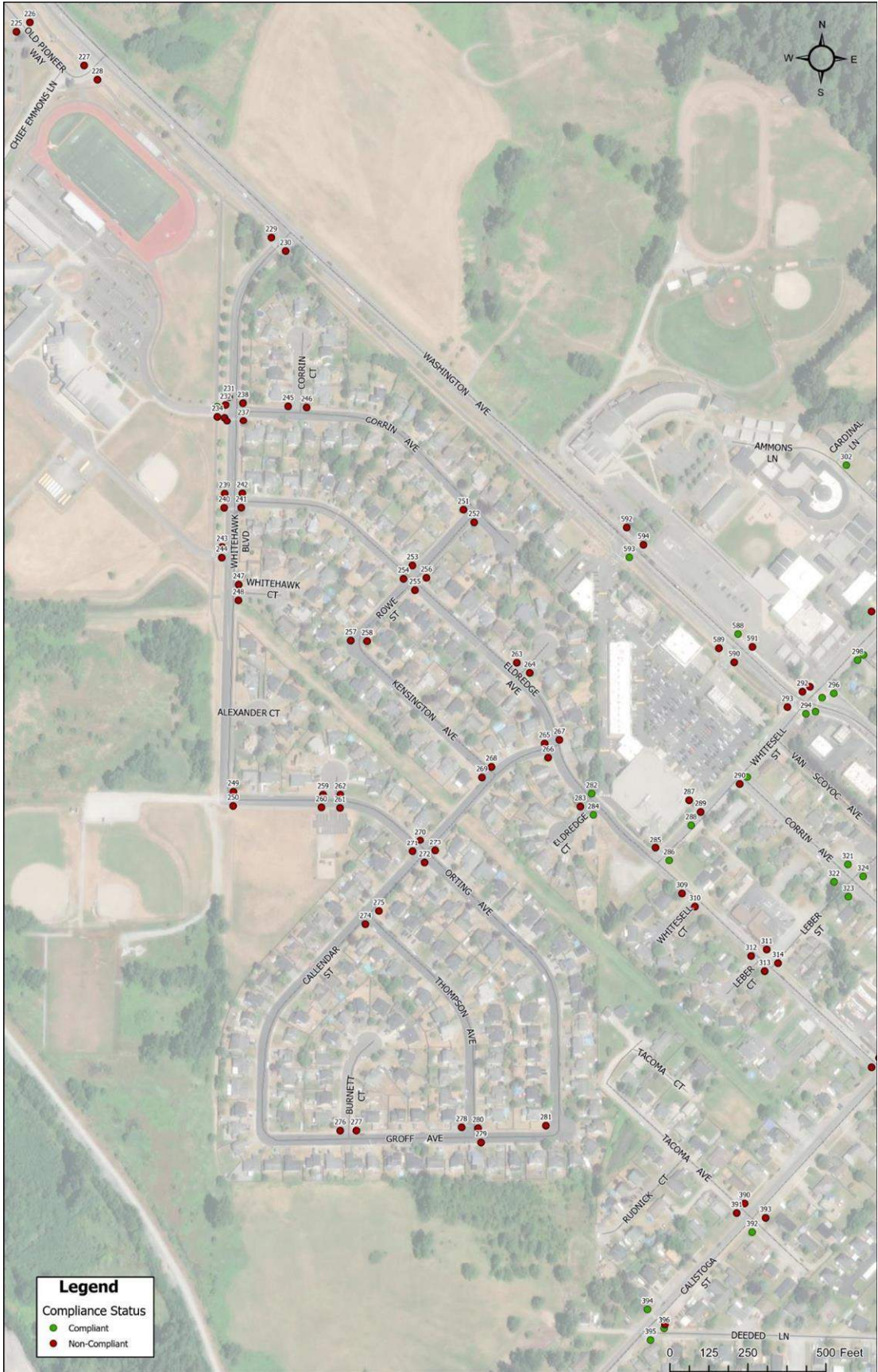




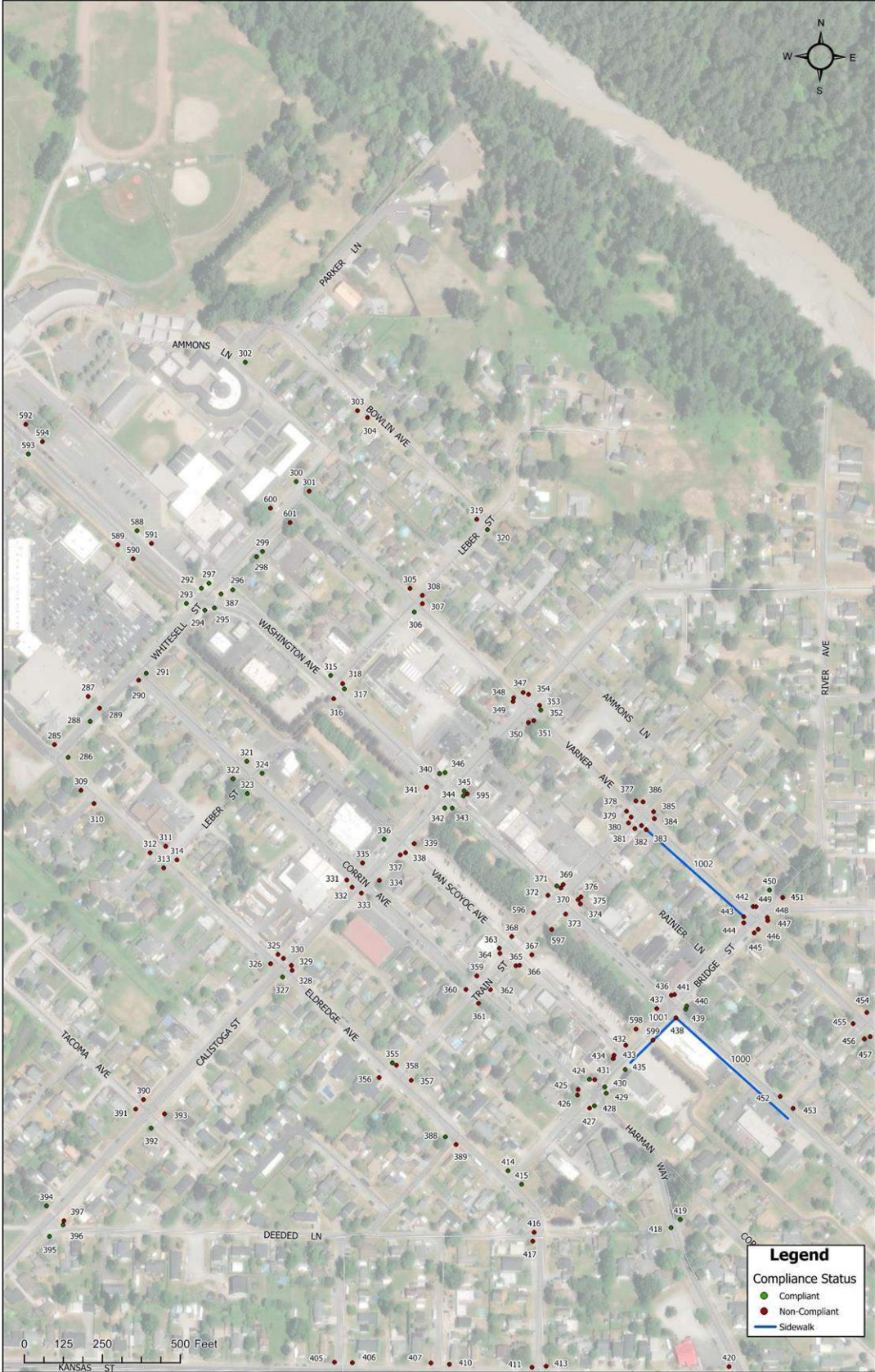




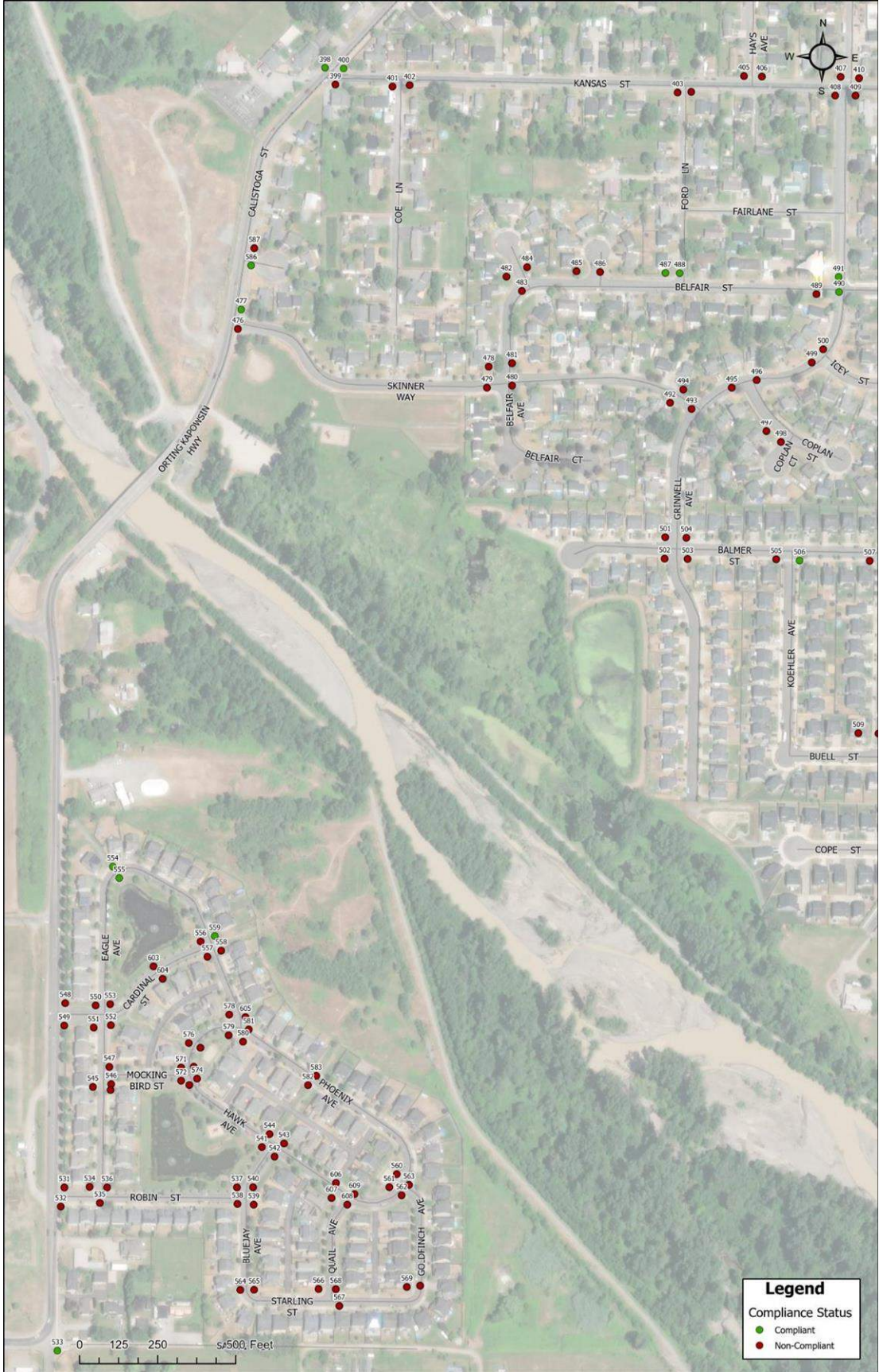




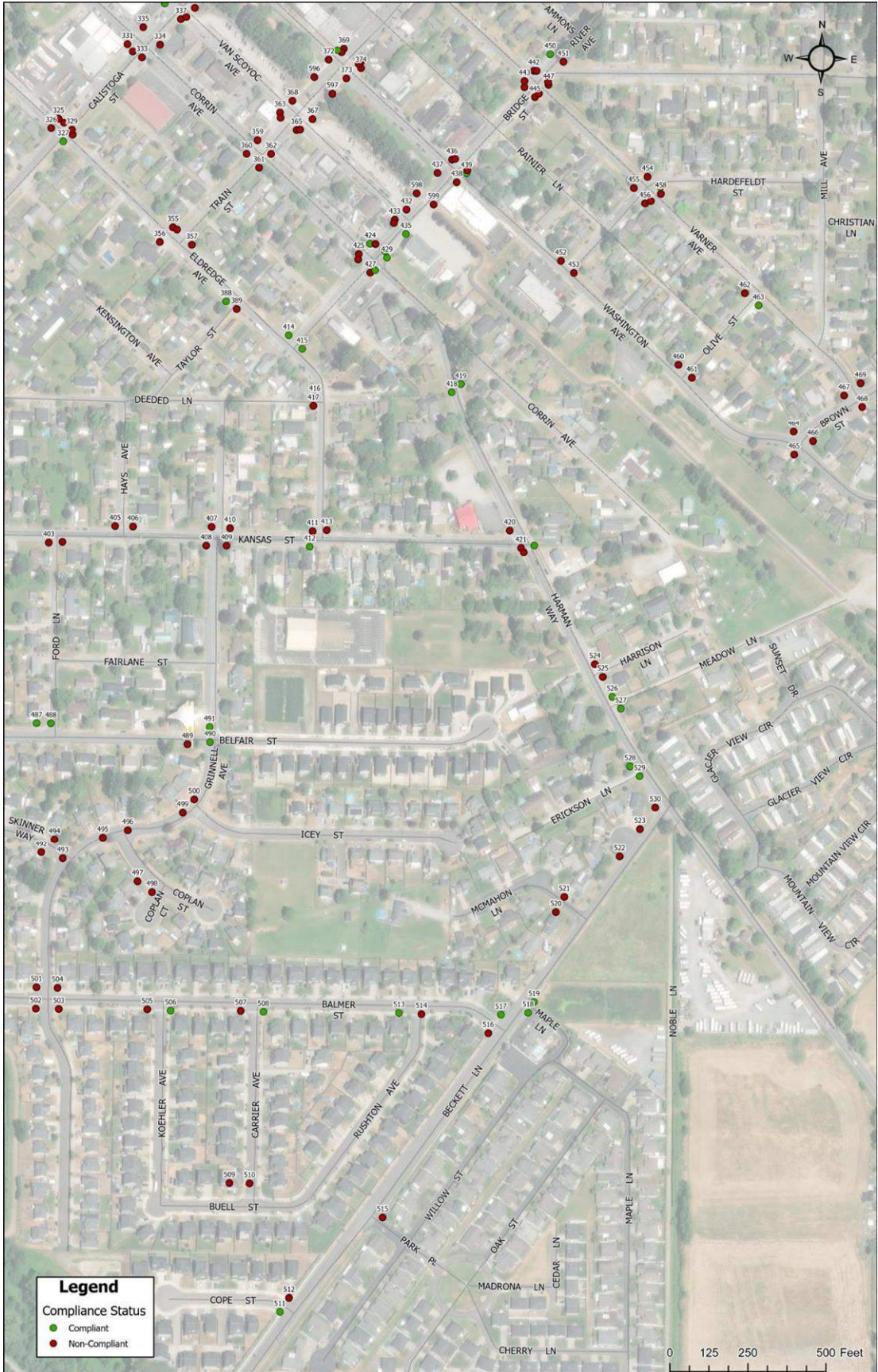




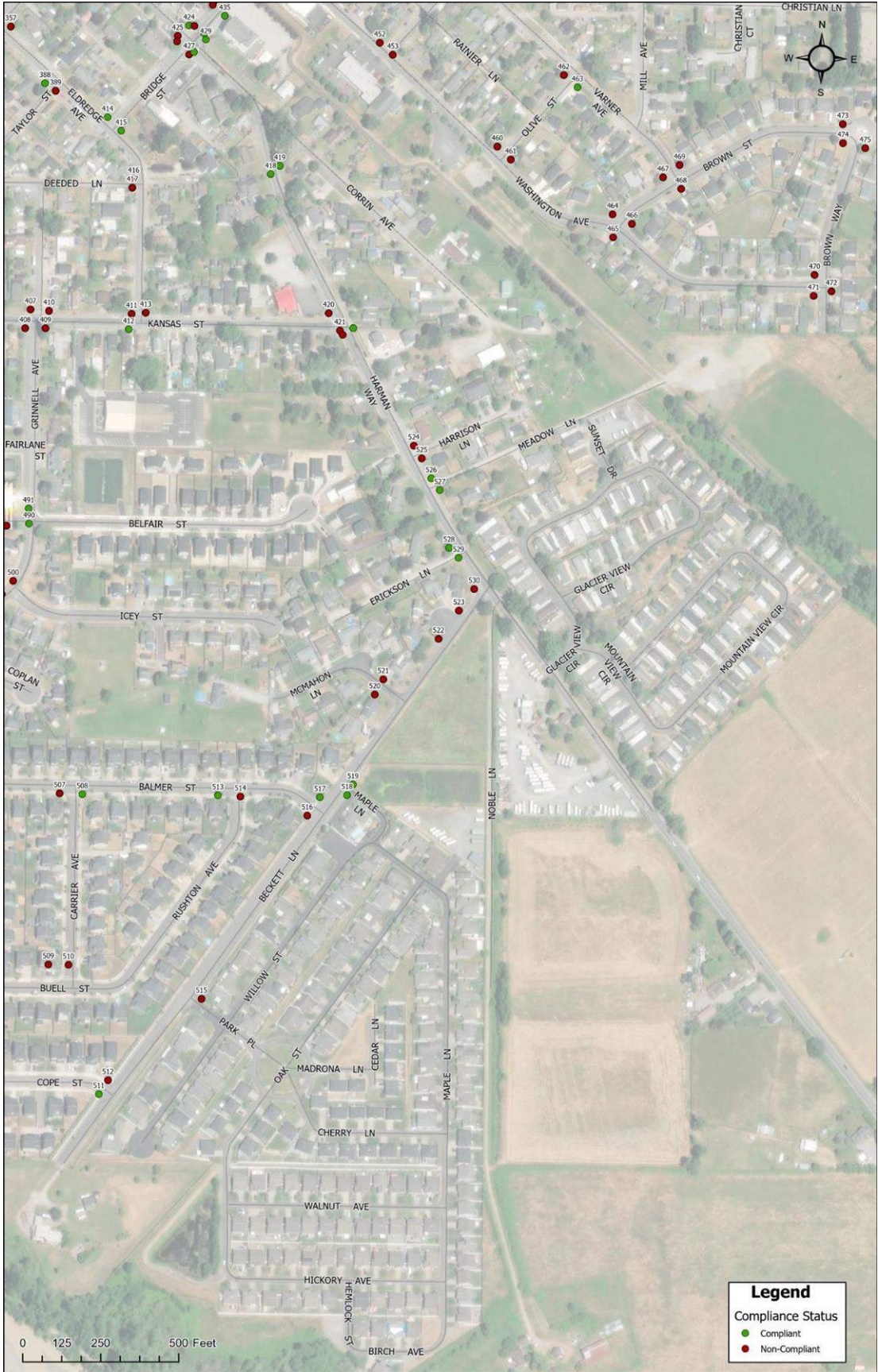












**Legend**

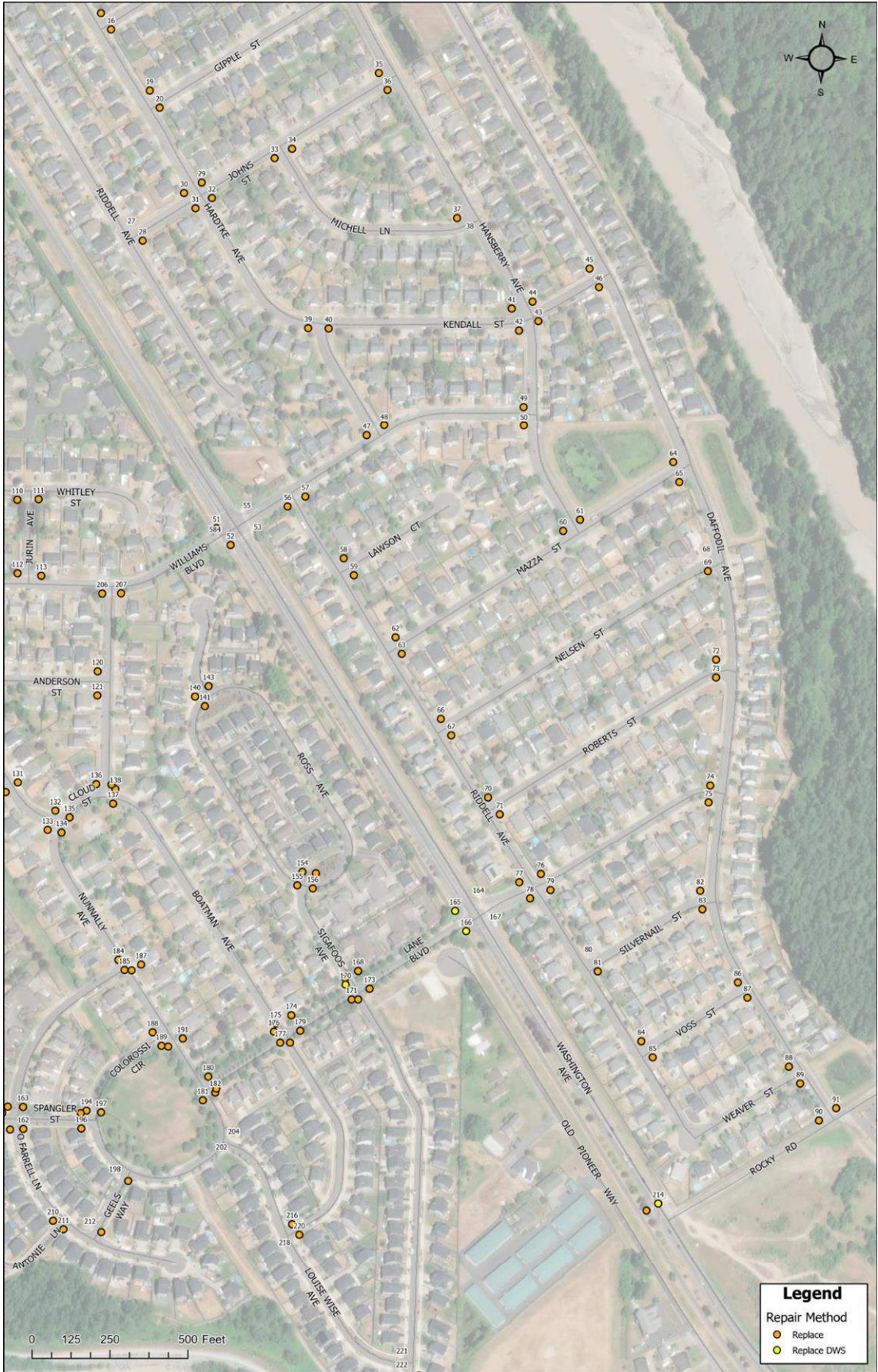
Compliance Status

- Compliant
- Non-Compliant









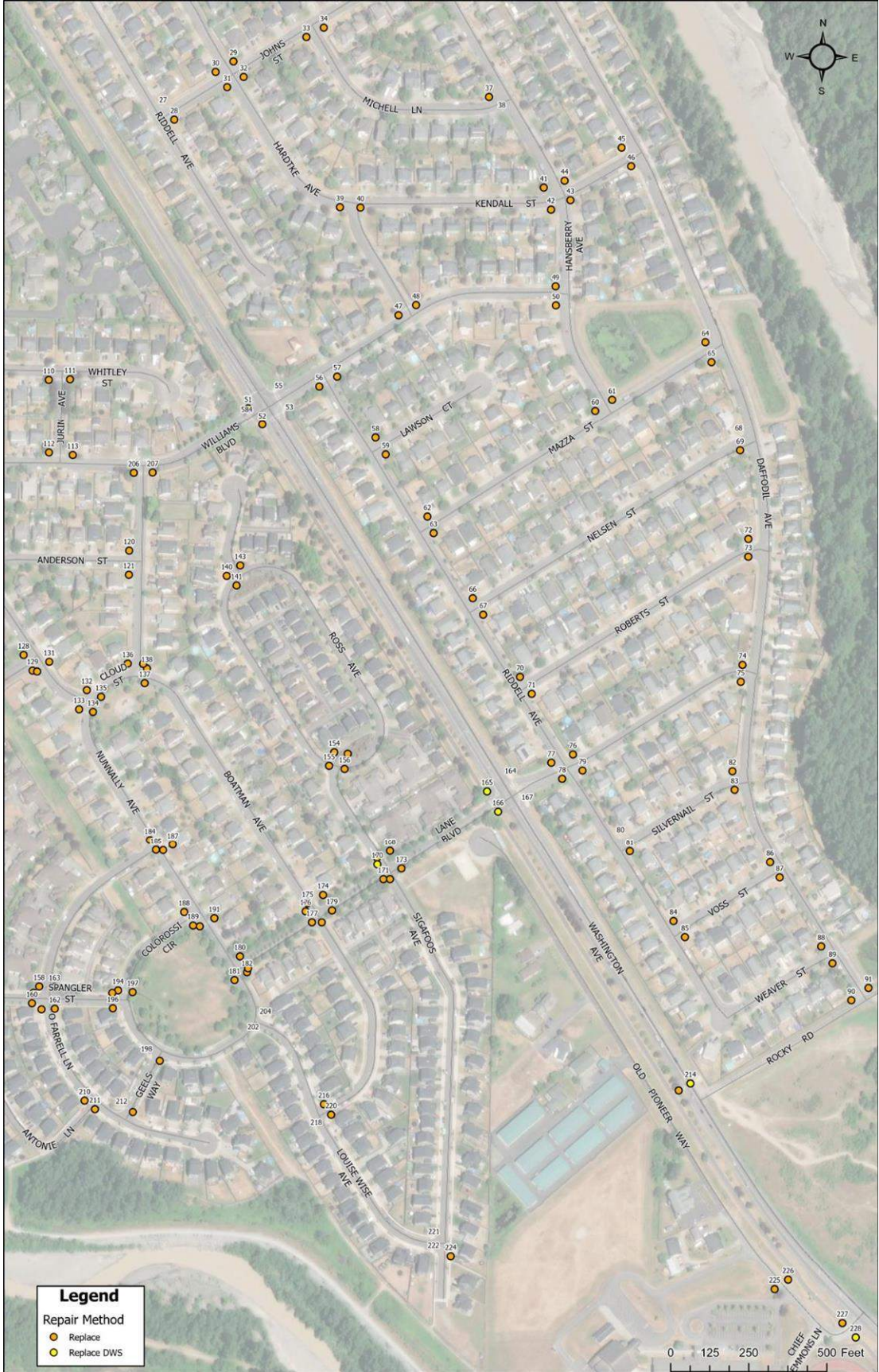
**Legend**  
 Repair Method  
 ● Replace  
 ● Replace DWS

0 125 250 500 Feet





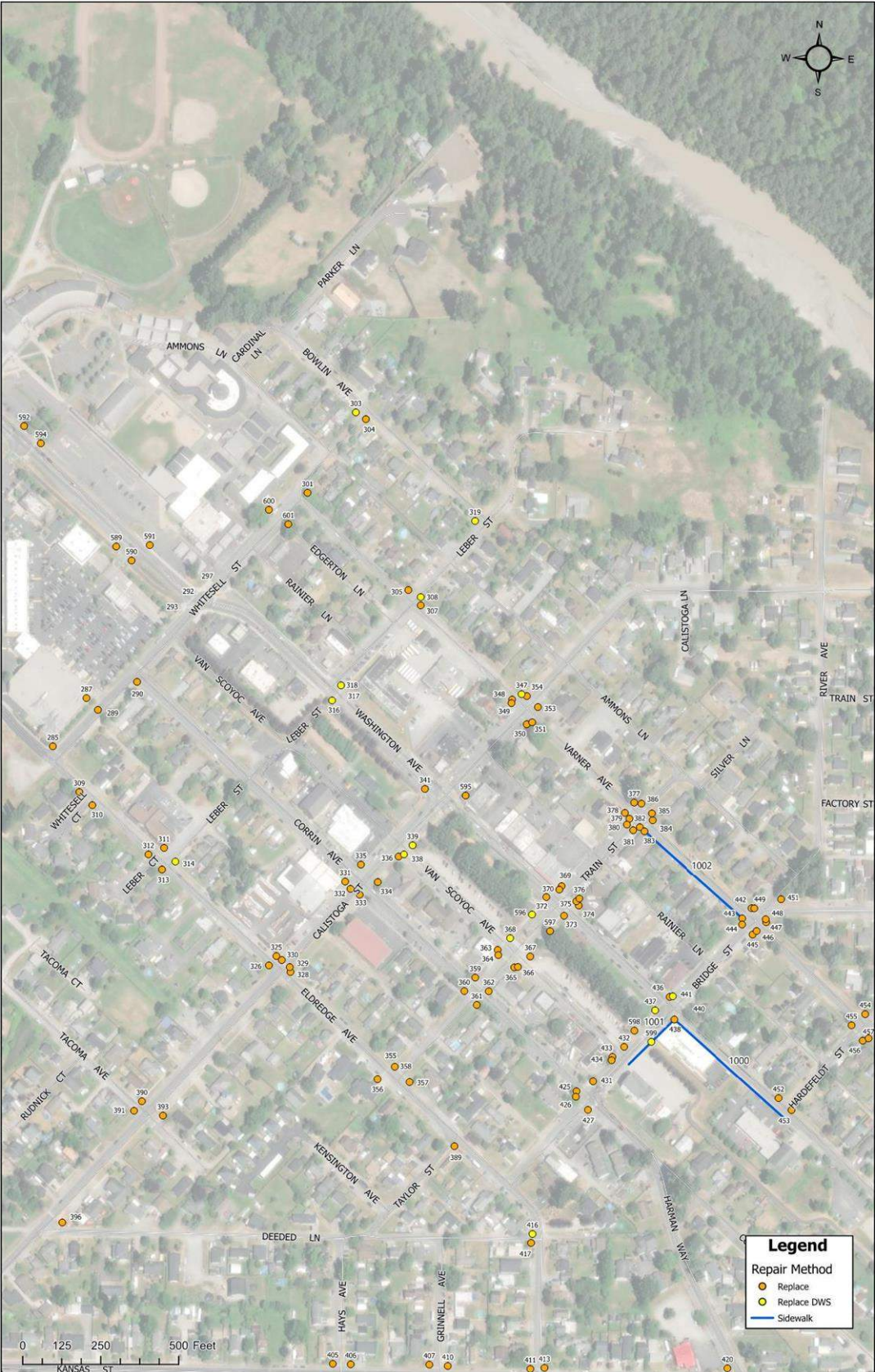




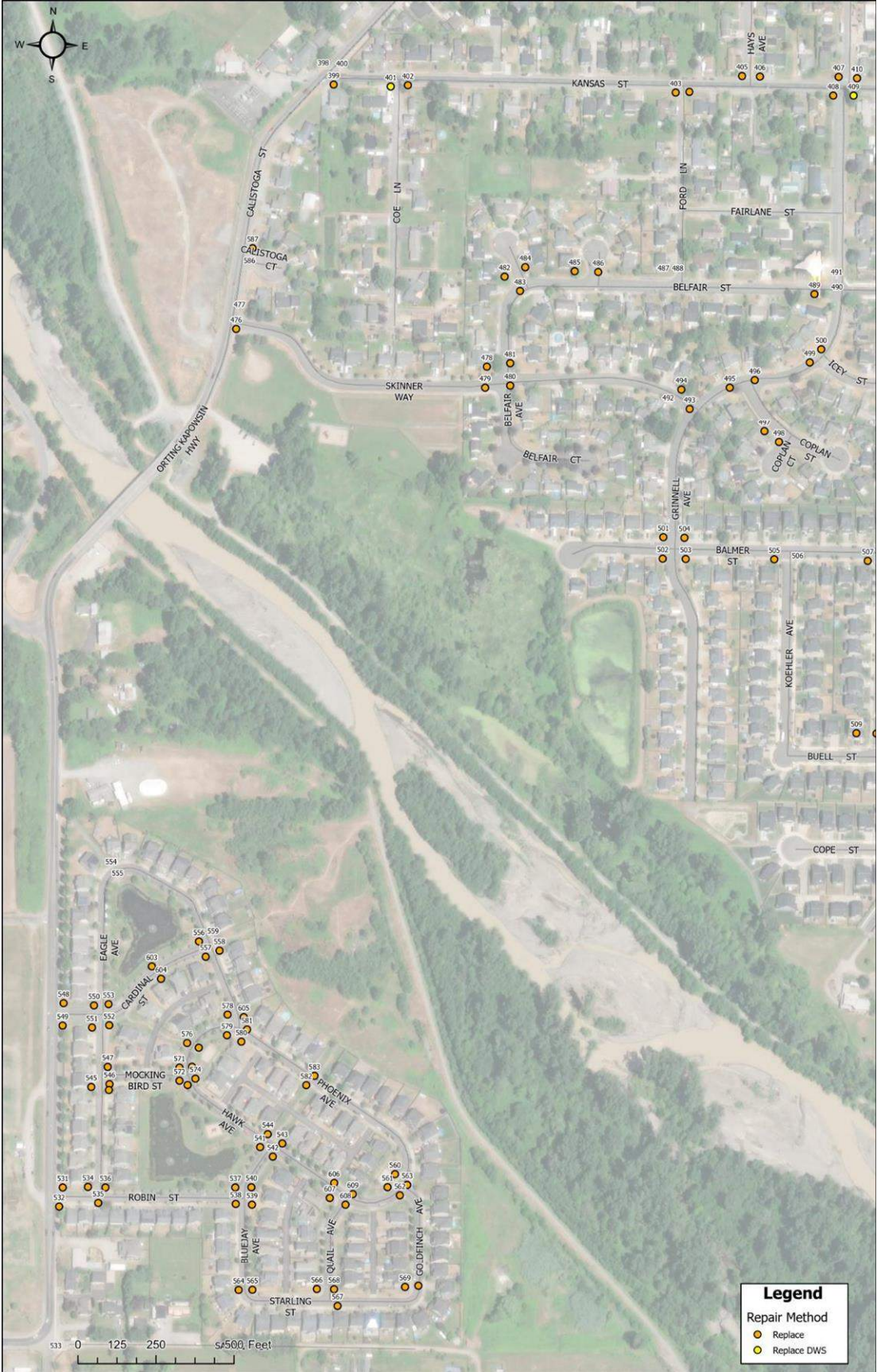




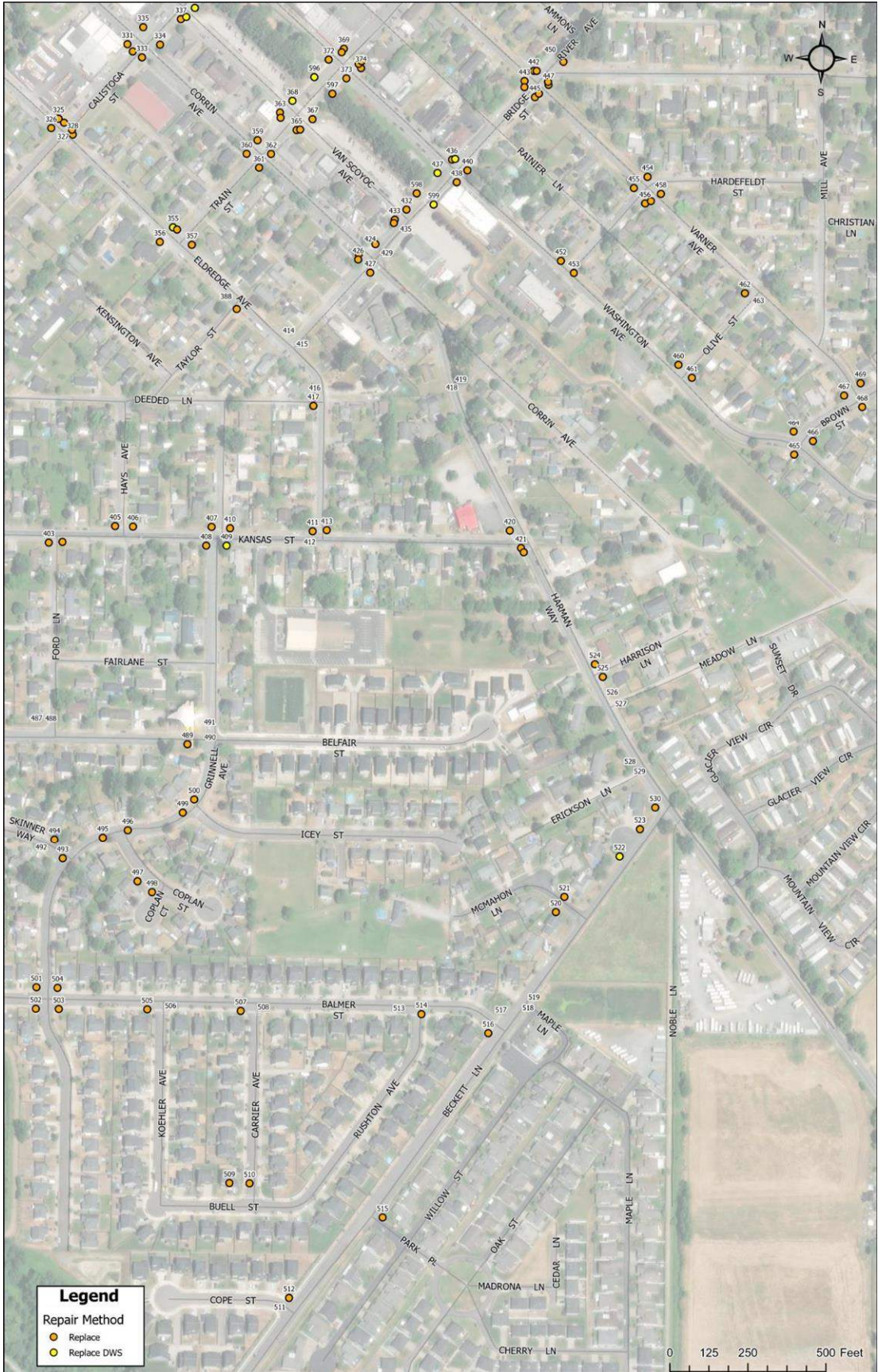




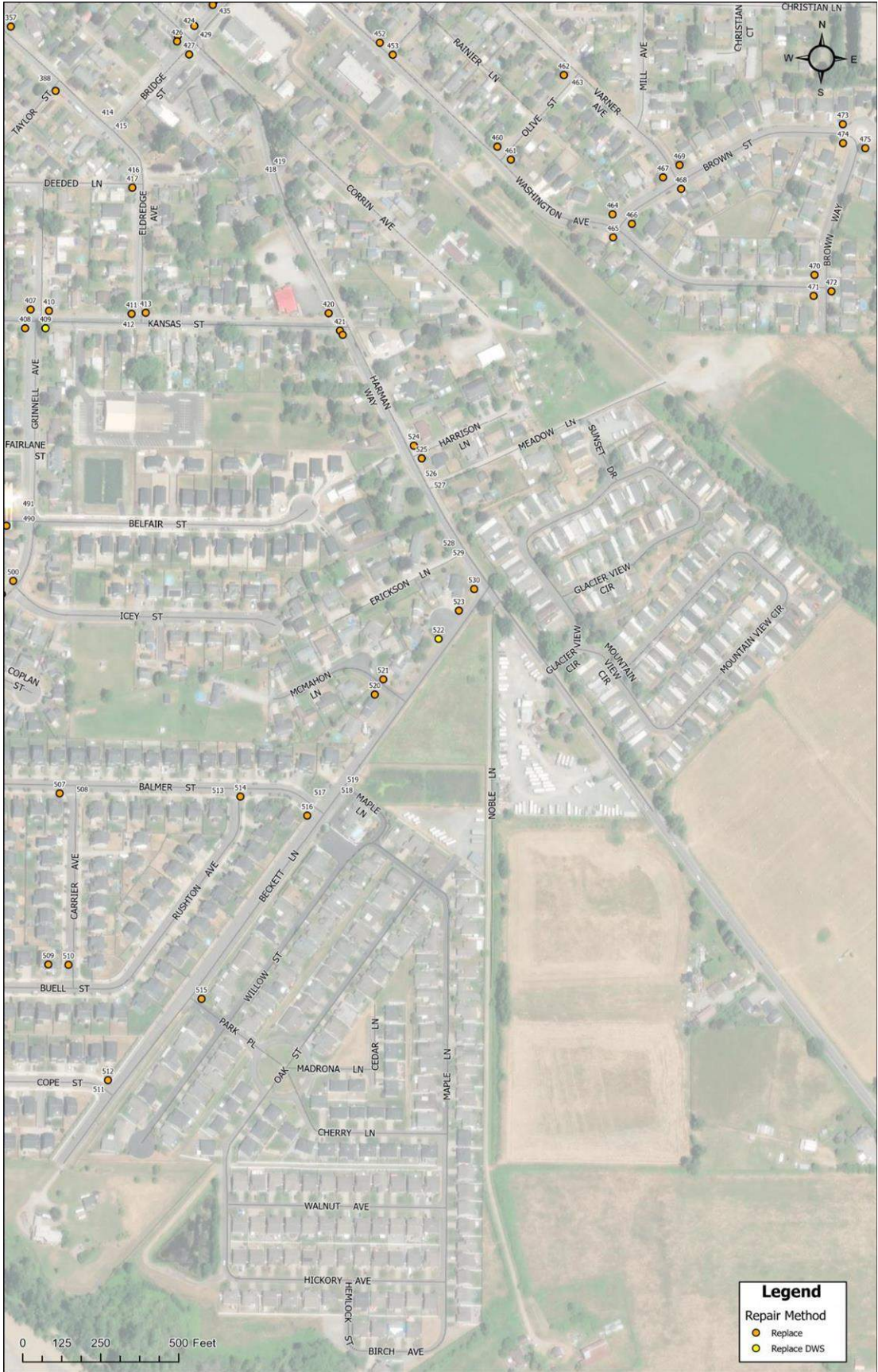












# Appendix D

City of Orting Resolution No. 2015-15

**CITY OF ORTING**  
**WASHINGTON**  
**RESOLUTION NO. 2015-15**

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**A RESOLUTION OF THE CITY OF ORTING,  
WASHINGTON, ADOPTING A POLICY AND NOTICE  
REGARDING THE AMERICANS WITH DISABILITIES  
ACT**

**WHEREAS**, the Congress of the United States adopted the Americans with Disabilities Act of 1990 (ADA) to prohibit discrimination against individuals with disabilities; and

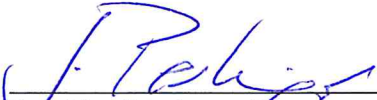
**WHEREAS**, the City Orting is required to comply with the ADA;

**NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF ORTING,  
WASHINGTON, DOES RESOLVE AS FOLLOWS:**

**Section 1.** The policy and procedures and notice are hereby adopted as an official policy of the City, in the form attached hereto as Exhibit A.

**PASSED BY THE CITY COUNCIL OF THE CITY OF ORTING, WASHINGTON,  
AT AN OPEN PUBLIC MEETING THEREOF HELD THIS 25<sup>TH</sup> DAY OF NOVEMBER,  
2015.**

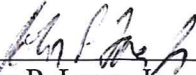
**CITY OF ORTING**

  
\_\_\_\_\_  
Joachim Pestinger, Mayor

ATTEST/AUTHENTICATED:

  
\_\_\_\_\_  
Rachel Pitzel, City Clerk

Approved as to form:

  
\_\_\_\_\_  
John P. Long, Jr.  
Kenyon Disend, PLLC  
City Attorney



## **Exhibit "A"**

### **PURPOSE:**

To establish a policy for ensuring reasonable access to services, programs and activities of the City of Orting and a procedure with which a person with disabilities can identify and request resolution of accommodation within a service, program or activity of local government.

### **ORGANIZATIONS AFFECTED:**

Applies to all departments and divisions.

### **POLICY:**

The City of Orting does not discriminate on the basis of disability. It is the policy of the City to assure disabled persons the opportunity to participate in, or benefit from employment, services, activities and facilities, where possible. The City, upon request, will provide reasonable accommodation in compliance with the Americans with Disabilities Act and the Washington Law against Discrimination.

### **DEFINITIONS:**

Disabled Individual – an individual (1) with a physical or mental impairment that substantially limits one or more of the major life activities of such individual; (2) with a record of such impairment; or (3) who is regarded as having such an impairment.

Reasonable Accommodation – are modifications or adjustments that enable an individual with a disability to enjoy equal benefits and privileges as are enjoyed by other individuals without disabilities, without placing an undue hardship on the operation of the City.

### **REFERENCES:**

1. The Americans with Disabilities Act of 1990, Title II.
2. Washington State Law against Discrimination, RCW Chapter 49.60.

### **NOTICE:**

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990, the City of Orting does not discriminate against qualified individuals with disabilities on the basis of disability in the City's services, programs or activities.

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990, the City of Orting does not discriminate on the basis of disability in its hiring or



employment practices and complies with all regulations promulgated by the Equal Employment Opportunity Commission under Title I of the ADA.

**Effective Communication:** The City of Orting, will, upon request, attempt to provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in the City's programs, services and activities. We strive to make information and communication accessible to people who have speech, hearing or vision impairments.

**Modifications to Policies and Procedures:** The City of Orting will make reasonable modifications to policies and programs to ensure that people with disabilities have equal opportunity to enjoy all City programs, services and activities. For example, individuals with service animals are welcomed in city offices and parks, where animals are generally prohibited.

Anyone who requires an auxiliary aid or service for effective communication or modification of policies or procedures to participate in a City program, service or activity, should contact the person or department who scheduled the event as soon as possible but no later than 72 hours before the scheduled event. If you are not sure who you should contact, you may contact the ADA Coordinator identified in this notice.

The ADA does not require the City to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden.

The City will not place a surcharge on a particular individual with a disability or group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy.

**ADA Questions and Complaints:** The City of Orting has an ADA Coordinator and a grievance procedure. Those are intended to ensure that complaints are handled promptly. Equitable resolution is strived for through the review process. Please contact the ADA Coordinator with questions or complaints about the ADA compliance efforts.

ADA Coordinator:

Rachel Pitzel  
110 Train Street SE  
Orting, WA 99360  
Phone: (360) 893-2219  
E-mail: [rpitzel@cityoforting.org](mailto:rpitzel@cityoforting.org)

## **PROCEDURE:**

1. The City Clerk of the City of Orting shall be the City's ADA Coordinator.
2. Requests for accommodation may first be directed to the individual responsible for the program, activity or service to which access is requested.
3. If access is not accommodated, a formal complaint must be submitted in writing to the ADA Coordinator within 30 working days after the complainant becomes aware of the alleged violation. Reasonable accommodation to assist in completing the form is available upon request.
4. The complaint must contain the name, address, and telephone number of the individual filing the complaint; briefly describe the alleged violation and the requested accommodation resolution. A form is available, but is not necessary.
5. The ADA Coordinator will conduct an informal, but thorough, review affording the complainant and the affected department(s) an opportunity to submit information relevant to the complaint and potential accommodation/resolution.
6. A written response and description of the accommodations/resolutions, if any, will be issued by the ADA Coordinator and sent to the complainant within 30 calendar days after the complaint is received, unless the complexities of the complaint require additional time, in which case the complainant will be notified. The accommodation or resolution may not be the same as requested.
7. The complainant may request a reconsideration of the case determination by submitting a request for reconsideration within ten (10) working days following the date the complainant receives the City's response.
8. The Mayor or his or her designee will conduct his/her review of the complaint and issue his/her decision to the complainant within twenty (20) working days of receiving the request for reconsideration, unless the complexities of the complaint require additional time. The Mayor and/or his or her designee's decision is final.
9. The City Clerk will maintain the files and records of the City of Orting related to ADA complaints filed and keep a log of complaints. The log shall include:
  - a. The name and address of the person filing the complaint;
  - b. The date of the complaint;
  - c. The basis of the complaint; and
  - d. The disposition of the complaint.

10. The individual's right to a prompt and equitable solution of the complaint will not be impaired by his/her pursuit of other remedies such as filing a grievance of an ADA complaint with the responsible federal department or agency. Use of this grievance procedure is not a prerequisite to the pursuit of other remedies.

**CITY OF ORTING  
PUBLIC ACCESS REQUEST FOR  
ACCOMMODATION FORM**

NAME OF ENTITY: CITY OF ORTING

RETURN TO: CITY CLERK

Name of Individual Requesting Accommodation	Address	Phone

Explain what functional disability you have that limits your ability to participate in a (Name of Entity) program or service: (e.g. "I am confined to a wheelchair.")

Describe the program, service or activity you cannot access due to your disability, and what you believe are the barriers to access or participation.

Proposed Accommodation/Resolution:

**RESERVED FOR ENTITY USE**

DATE RECEIVED:	BY:
DATE SENT TO ADA COORDINATOR:	
DATE CITY RESPONSE SENT:	

**CITY OF ORTING PUBLIC ADA  
COMPLAINT FORM**

<p>NAME OF ENTITY: CITY OF ORTING</p> <p>RETURN TO: CITY CLERK</p>
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NAME OF COMPLAINANT	ADDRESS	PHONE

<p>ISSUE: (Identify the nature of disability and how it impairs a major life function)</p>       
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<p>PROPOSED ACCOMMODATION/RESOLUTION:</p>          
---

<b>RESERVED FOR ENTITY USE</b>	
DATE RECEIVED:	BY:
DATE SENT TO ADA COORDINATOR:	
DATE CITY RESPONSE SENT:	

# Appendix E

City of Orting Facilities Memo





## Technical Memo

**To:** John Bielka, City of Orting  
**From:** Andrew Armstrong, SCJ Alliance  
**Date:** February 23, 2024  
**Project:** City of Orting ADA Transition Plan  
**Subject:** ADA Accessibility of the City of Orting Facilities

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### Introduction:

The City of Orting maintains a number of facilities for the public, including buildings and parks. Facilities must meet the ADA Accessibility Guidelines (US Access Board, n.d.). These guidelines apply to parks and buildings constructed, altered, or added onto post-2010. This means that although the City of Orting's facilities are not all up to current standards, they are not necessarily out of compliance. Existing barriers to access are required to be removed when they are readily achievable (ADA, 2012). This memo describes the compliant features as well as the noncompliant features and the actions that should be taken to bring them into compliance with the current standards. These features were assessed by visual inspection over multiple site visits.

## 1 Publicly Accessible Buildings

**Buildings were evaluated for ADA Parking Stalls and ADA compliant walkways to ADA compliant restrooms. The buildings evaluated were:**

- ◆ Library
- ◆ City Hall
- ◆ Old City Hall
- ◆ Public Works Building

### 1.1. Parking:

- ◆ Library: 1 ADA Parking Stall, 8 Total Stalls
- ◆ City Hall: 2 ADA Parking Stalls, 13 Total Stalls
- ◆ Old City Hall: 1 ADA Parking Stall, 8 Total Stalls
- ◆ Public Works Building: 1 ADA Parking Stall, 15 Total Stalls
- ◆ These buildings all have a compliant number of ADA Parking Stalls (Figure 1)



**Minimum Number of Accessible Parking Spaces**

[\[§208.2\]](#)

**Minimum Number of Accessible Parking Spaces Table**  
 \* at least 1 of every 6 accessible spaces or fraction of 6  
 \*\* 501 to 1000: 2% of total  
 \*\*\* 1001 and over: 20 + 1 for each 100 or fraction thereof over 1000

Parking Facility Total	Minimum Number of Accessible Spaces		
	Standard	Van*	Total (Standard + Van)
1 to 25	0	1	1
26 to 50	1	1	2
51 to 75	2	1	3
76 to 100	3	1	4
101 to 150	4	1	5

Figure 1. ADA Accessible Parking Spaces Requirement (U.S. Access Board, n.d., Chapter 5: Parking Spaces)

## 1.2. Walkways:

- ◆ All buildings have ADA compliant walkways to access ADA compliant restrooms.
- ◆ Old City Hall has one doorway with only 32" of clear width, but this is compliant since it does not last for 24" (Figure 2).

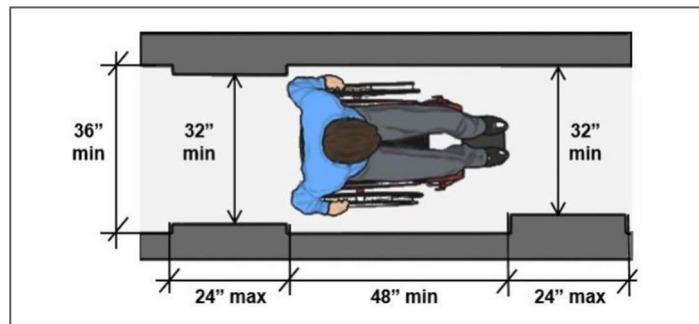


Figure 2. Minimum Clearance Requirements (U.S. Access Board, n.d., Chapter 4: Accessible Routes)

## 2 Parks

The City's parks were evaluated for ADA compliant walkways, restrooms, parking spots, and playgrounds. The parks evaluated were:

- ◆ Callistoga Park
- ◆ Cemetery
- ◆ Charter Park
- ◆ Gratzner Sports Park
- ◆ Main City Park
- ◆ Rainier Meadows Park
- ◆ Whitehawk Park
- ◆ Williams Park
- ◆ 3 Corners Park
- ◆ Memorial Park
- ◆ North Park
- ◆ Triangle Park
- ◆ Foothills Trail

### 2.1. Calistoga Park

Calistoga Park has a parking lot with many potholes and no ADA parking stalls, which is non-compliant. ADA Parking stalls should be provided following Figure 1, and ADA access aisles should be provided to be compliant. A gravel path leads to one of the two playgrounds and the dog park, although it needs maintenance and does not continue into the dog park. This path does not provide access to the baseball field, which is non-compliant (Figure 5).

The playgrounds both have wood chip surfacing that needs maintenance to level it out and increase its compaction. The curb outlining the playgrounds must be altered to not be a barrier to an ADA accessible route. The playgrounds have seven elevated play components accessible via transfer system, five elevated play components not accessible via transfer system, and 10 ground-level play components (four of which are swings). This would be compliant if the ground-level play components were ADA accessible (Figure 3). However, two of the ground-level play components have no accessible walkway and the other four need surfacing maintenance to provide an ADA accessible route. As there are less than 20 elevated play components, a transfer system may be used to connect 50% of the elevated play components and it is compliant (Figure 4).

**Ground Level Requirements Based on Elevated Play Components**

The number and variety of ground-level play components required to be on an accessible route is also determined by the number of elevated components provided in the play area. The intent of this requirement is to provide a variety of experiences for individuals who choose to remain with their mobility devices, or choose not to transfer to elevated play components.

**Table 240.2.1.2**

Number of elevated play components provided	Minimum number of ground-level play components required to be on accessible route	Minimum number of different types of ground-level play components required to be on accessible route
1	Not applicable	Not applicable
2 to 4	1	1
5 to 7	2	2
8 to 10	3	3
11 to 13	4	3
14 to 16	5	3
17 to 19	6	3
20 to 22	7	4
23 to 25	8	4
More than 25	8 plus 1 for each additional 3 over 25, or fraction thereof	5

If ramps provide access to at least 50 percent of the elevated play components – which must include at least three different play types – then additional ground-level components are not required. An example: the composite structure of a play area has four elevated play components (bubble panel, slide, steering wheel, and tic-tac-toe panel). According to the table, a minimum of one ground level play component must be provided, and a minimum of one different type. The spring rider or swing can be used to meet the “one of each type” requirement and can also be used to meet the minimum number determined by Table 240.2.1.2. The number of ground-level components determined by “one of each type” can also fulfill the minimum ground level requirement that is indicated by the elevated play components table.

**Figure 3. Ground Level Component Requirements (U.S. Access Board, n.d., Chapter 10: Play Areas)**

A transfer system provides access to elevated play components within a composite system by connecting different levels with transfer platforms and steps. A transfer system provides access to elevated play components without the use of a wheelchair or mobility devices. At least 50 percent of the elevated play components can be connected by a transfer system in play areas with fewer than 20 elevated components. In play areas with 20 or more elevated play components, transfer systems may be used to connect up to 25 percent of the elevated play components and the rest of the elevated play components required to be on an accessible route must be connected by a ramp.

**Figure 4. Transfer System Requirements (U.S. Access Board, n.d., Chapter 10: Play Areas)**



Accessible routes must connect each area of sport activity. Areas of sport activities must comply with all ADAAG requirements, except that they are exempt from the requirement that surfaces must be stable, firm, and slip resistant, and from the restrictions on carpets, grating, and changes in level. They are also exempt from restrictions on protruding objects. These provisions are not required inside of the area of sport activity since they may affect the fundamental nature of the sport or activity. For example, an accessible route is required to connect to the boundary of a soccer field, but there is no requirement to change the surface of a field to an accessible surface.

Where light fixtures or gates are provided as part of a court sport or other area of sport activity, they must comply with ADAAG provisions for controls and operating mechanisms, and for gates and doors.

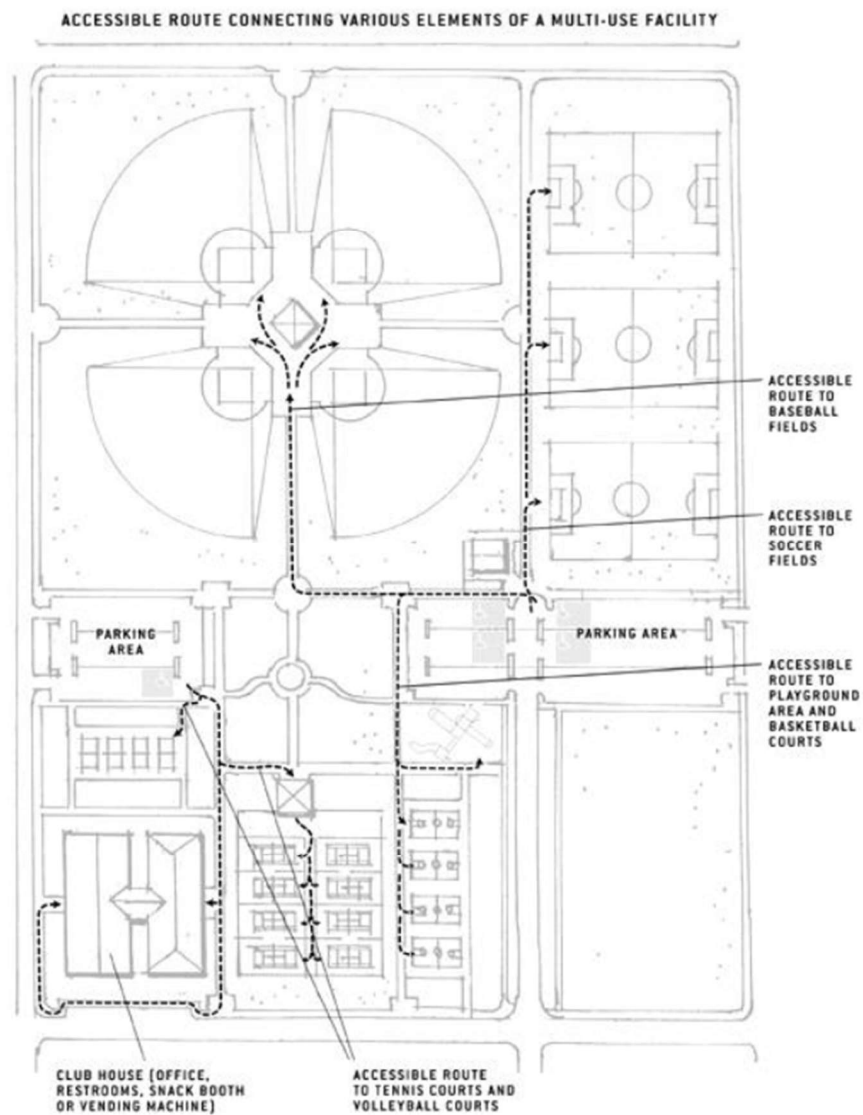


Figure 5. Accessible Routes to Facilities Requirements (U.S. Access Board, n.d., Chapter 10: Sports Facilities)

## 2.2. Cemetery

The cemetery has no parking lot or walking path, but it does have an ADA accessible portable toilet. It is unclear where an ADA accessible route to this portable toilet should be provided from, but access to this toilet should be provided to be compliant.

## 2.3. Charter Park

Charter Park has an accessible path to the skateboard park and two ADA parking spots with 38 total stalls.

## 2.4. Gratzer Sports Park

Gratzer Sports Park has a gravel parking lot with two ADA Parking spots noted. A gravel path starts at the parking lot, but this path must extend to the baseball fields and requires maintenance to meet ADA requirements (Figure 5). The ADA parking stalls, and an access aisle, should be paved to make them compliant and meet the firm, stable, and slip resistant surfacing requirement.

## 2.5. Main City Park

Main City Park has two gravel parking lots that each have one paved ADA parking spot, and since the parking lots are gravel, it is unclear how many total spots there are. The number is around 25 parking spots per lot, and having 25 spots or under means one ADA Accessible parking spot is all that is required so this parking lot is compliant (Figure 1).

The park provides an ADA compliant walkway to the permanent restrooms as well as the ADA compliant portable toilet. The basketball court lacks an accessible walkway (Figure 5), while the gazebo has one that fails the cross-slope test as it is turning to go up the gazebo. Both are non-compliant and should be updated. Several picnic tables have ADA access provided.

The structural components of the playground include seven ground-level play components and eight elevated play components. The playground surfacing needs maintenance to level out the surfacing and increase its compaction. The curb outlining the playgrounds must be altered to not be a barrier to an ADA accessible route. The structural components would be compliant if an accessible path reached three of them (Figure 3). The elevated components are connected with a transfer system, which is compliant (Figure 4).

## 2.6. Rainier Meadows Park

Rainier Meadows Park has a paved walkway connecting the playground to the sidewalk. The paved walkway does not provide access to the basketball court and needs maintenance as noted by a complaint from the public during the survey. The playground surfacing needs maintenance to level out the surfacing and increase its compaction. The curb outlining the playgrounds must be altered to not be a barrier to an ADA accessible route.

The structural components of the playground include one ground level component and six elevated play components. To be compliant, the playground should provide two ADA compliant and accessible ground level components as well as an accessible route to the transfer system (Figure 3). The transfer system is compliant (Figure 4).

## 2.7. Whitehawk Park

Whitehawk Park has a paved parking lot with two ADA accessible parking spots and 18 total parking spots. There is an ADA accessible route connecting the parking lot, the basketball court, and the playground. This route does not connect to the baseball field, which is non-compliant (Figure 5). There is a portable toilet provided, but it is not ADA compliant, which means an ADA compliant one should be provided as well or in place of it (Figure 6).

The playground has nine elevated play components and four ground-level play components (Figure 3). The playground surfacing needs maintenance to level out the surfacing and increase its compaction. The curb outlining the playgrounds must be altered to not be a barrier to an ADA accessible route. At least three of the ground-level play components must be on an accessible route, as well as the transfer system. The transfer system for the elevated play components is compliant (Figure 4).

### Required Compliance

[\[§213\]](#)

Plumbing and building codes address the number and type of toilet rooms and toilet fixtures required for a facility. The ADA Standards, on the other hand, do not address the number of toilet rooms or fixtures required for a facility, but instead specify which ones must be accessible where provided. In new construction, access is required to all toilet rooms, including those for employees. However, where single user toilet rooms are clustered in one location, at least half for each use must comply (§213.2., Ex. 4). In the case of single user portable units, access is required to at least 5% at each cluster, excluding those on construction sites for construction personnel which are fully exempt (§213.2, Ex. 3, §203.2).

Figure 6. ADA Accessible Portable Toilet Requirements (U.S. Access Board, n.d., Chapter 6: Toilet Rooms)

## 2.8. Williams Park

Williams Park has a paved ADA accessible route through it with access to a bench and a picnic table.

## 2.9. 3 Corners Park

3 Corners Park has a gravel walkway through it that needs maintenance to be ADA accessible (Figure 7).



## Surface [1017.2]



The surfaces of trails, passing spaces, and resting intervals must be firm and stable. A firm trail surface resists deformation by indentations. A stable trail surface is not permanently affected by expected weather conditions and can sustain normal wear and tear from the expected uses between planned maintenances.

Paving with concrete or asphalt may be appropriate for highly developed areas. For less developed areas, crushed stone, fine crusher rejects, packed soil, soil stabilizers, and other natural materials may provide a firm and stable surface. Natural materials also can be combined with synthetic bonding materials to provide greater stability and firmness. These materials may not be suitable for every trail.

### **DESIGN TIP—Building a firm and stable surface**

A firm and stable surface does not always mean concrete and asphalt. Some natural soils can be compacted so that they are firm and stable. Other soils can be treated with stabilizers without drastically changing their appearance. Designers are encouraged to investigate the options and use surfacing materials that are consistent with the site's level of development and that require as little maintenance as possible.

Figure 7. Trail Surfacing Requirements (U.S. Access Board, n.d., Chapter 10: Outdoor Developed Areas)

## 2.10. Memorial Park

Memorial Park has a paved ADA accessible route through it.

## 2.11. North Park

North Park has a paved ADA accessible route to the building and most of the benches. However, the building was locked so it is unclear what is inside.

## 2.12. Triangle Park

Triangle Park has a paved ADA accessible sidewalk around it and a gravel route through it with access to a bench. This gravel walkway needs maintenance to be considered accessible (Figure 7).

## 2.13. Foothills Trail

The Foothills Trail is a paved path through the City of Orting. Although sections of it could use maintenance, it provides the 5' ADA accessible route throughout the city. Many of the street crossings for this trail are noncompliant and need maintenance as noted in the curb ramp section of the plan.

### 3 References

ADA. (2012, March 08). *Americans with Disabilities Act Title III Regulations*. United States Department of Justice. <https://www.ada.gov/law-and-regs/regulations/title-iii-regulations/#part-36-nondiscrimination-on-the-basis-of-disability-in-public-accommodations-and-commercial-facilities-as-amended-by-the-final-rules-published-on-august-11-2016-and-december-2-2016>

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