City of Walla Walla

Right-of-Way ADA Transition Plan

October 2020

Prepared by

transpogroup

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For those who are deaf or hard of hearing, the Washington State Relay can be contacted at 711 for assistance in making a request to the city.

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Executive Summary

This Americans with Disabilities Act Self-Evaluation and Transition Plan establishes the City of Walla Walla's ongoing commitment to providing equal access for all, including those with disabilities. In developing this plan, the City of Walla Walla has undertaken a comprehensive evaluation of its facilities and policies related to the public rights-of-way to determine what types of access barriers exist for individuals with disabilities. This plan will be used to help guide future planning and implementation of necessary accessibility improvements.

Both the Self-Evaluation and the Transition Plan are required elements of the federally mandated ADA Title II, which requires that government agencies provide equal access to programs and services they offer. While the ADA applies to all aspects of government services, **this document focuses on City of Walla Walla facilities within the public right-of-way. This includes attributes of sidewalks, curb ramps, and pedestrian pushbuttons as these are the facility types inventoried by the City.**

This document summarizes the Self-Evaluation, which includes an accessibility assessment of pedestrian facilities as well as practices and procedures which relate to them, such as curb ramp design standards. It also contains a Transition Plan, which identifies a schedule for the removal of barriers and identifies how the City will address requests for accommodations in a consistent manner.

The City's objective is to remove physical barriers associated within the public right-of-way using transportation funding, utility funding, and grants. The City is committed to removing these barriers and over the next 40 years the City will implement projects to remove the highest priority barriers. In addition, the City is continually working towards maintaining ADA compliance for all future capital improvement projects, permitted development, and any other right-of-way construction projects.

1 Introduction

1.1 Plan Requirements and Standards

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

Cities and other government agencies are required to have an ADA self-evaluation and transition plan when they grow beyond a threshold of 50 employees. Accessibility requirements extend to all public facilities. The scope of this plan is focused on accessibility within the public rights-of-way.

The first Walla Walla ADA Compliance Plan was completed in March 1994. This plan looked at the steps necessary to bring the City into ADA compliance focusing on buildings and facilities, employment, and City programs. The plan identified people responsible for completing each action or step and areas to provide a schedule to achieve them. In August 2019, an Interim ADA Transition Plan went into effect. The interim plan was created to adopt revisions to the 1994 plan and repeal items in conflict with the interim plan.

The following plan is a continuation of the interim plan and is necessary to bring the pedestrian facilities in the public right-of-way into compliance. The City completed an inventory of some of its pedestrian facilities and entered it into the City's Geographic Information System. The plan allows the City to prioritize removal of barriers and update procedures as they relate to the public right-of-way.

There are five titles, or parts, to the ADA of which Title II is most pertinent to travel within the public right-of-way and government owned buildings. Title II of the ADA requires public entities to make their existing "programs" accessible "except where to do so would result in a fundamental alteration in the nature of the program or an undue financial and administrative burden." Public right-of-way, public government buildings, and public parks all fall within the City's programs.

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

The plan shall, at a minimum—

(i) Identify physical obstacles in the public entity's facilities that limit the accessibility of its programs or activities to individuals with disabilities;

(ii) Describe in detail the methods that will be used to make the facilities accessible;

(iii) Specify the schedule for taking the steps necessary to achieve compliance with this section and, if the time period of the transition plan is longer than one year, identify steps that will be taken during each year

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

To determine the physical obstacles in a public entity's facility, the proper standards and guidance must be identified for each feature type.

The 2010 ADA Standards for Accessible Design (ADAS), is the standards document in which all Federal ADA standards are collectively held. The 2010 ADAS and regulations from the 28 CFR Part 36 replaced the 1991 ADA (ADA Accessibility Guidelines (ADAAG)).

The *Revised Draft Guidelines for Accessible Public Rights-of-Way* was published by the United States Access Board in 2005 to provide guidance on establishing accessible facilities within the

right-of-way. The United States Access Board's *Proposed Guidelines for Pedestrian Facilities in the Public Right-of-Way*, or PROWAG, was then published for comment in 2011 as a revised set of guidelines for right-of-way pedestrian facilities. Both the 2005 and 2011 guidelines have not yet been adopted as federal standards. Despite this delay, many public entities currently use the 2005 draft PROWAG as 'best practice' for features within the public rights-of-way. This practice has been endorsed by the Federal Highway Administration (FHWA), the US Access Board, and is the standard the Washington Department of Transportation adheres to.

The public right-of-way facilities evaluated under this plan were evaluated against 2011 PROWAG as this is the latest guideline developed by the Access Board.

1.2 Plan Structure

The structure of this plan was organized to closely follow federal ADA transition plan requirements. This includes:

Chapter 1 – Introduction

Chapter 2 – Self-Evaluation Documents self-evaluation findings including physical barriers as well as practices or design standards that result in accessibility barriers.

Chapter 3 – Stakeholder Engagement Documents public engagement efforts.

Chapter 4 – Barrier Removal Describes both programs and mechanisms the City will use to remove accessibility barriers and identifies a number of detailed recommendations the City should implement to remove accessibility barriers moving forward.

Chapter 5 – Implementation Outlines a schedule for the transition plan, including prioritization of projects, planning level cost estimates and potential funding sources.

Chapter 6 - Current Practices Provides the City with a location to store important and evolving plan information such as where and how this plan should be accessible, annual performance tracking, identification of the official responsible and other items that will change over time.

Several associated appendix items are included to supplement this plan.

Appendices

Appendix A – Existing Data Inventory

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2 Self-Evaluation

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

This section describes the data collection process and resulting inventory of physical facilities such as sidewalks and curb ramps within the City's public rights-of-way along with an overview of the policies and standards.

2.1 Policy and Design Standards

The City of Walla Walla primarily addresses pedestrian facilities in their Municipal Code 2019, standard plans (2020), and Comprehensive Plan (2018). The policies and standards were reviewed against the Access Board's *Proposed Guidelines for Pedestrian Facilities in the Public Right-of-Way*, PROWAG 2011 and recommendations were provided to fill gaps as they relate to the ADA.

The City documents were reviewed for content involving existing ADA programs, policies, and practices. ADA-related content was then compiled to see how they compare to one-another. For greater detail on the policies and standards review, see **Appendix B** for a barrier audit memo.

2.1.1 Policies

2.1.1.1 Comprehensive Plan

The City of Walla Walla develops a Comprehensive Plan in order to complete long range planning for the city. The last time this plan was adopted was in June 2018 and is intended for planning to the year 2040. The planning covers topics from land use, housing, historic preservation, and transportation.

Goals of the transportation element within the Comprehensive Plan that relate to existing pedestrian facilities generally include the following policies:

- Improve the safety of all types of travel modes.
- Enhance crossings for pedestrians and bicyclists where appropriate
- Provide facilities for all modes of transportation.
- Enhance connectivity and accessibility for all users.
- Require multimodal accessibility within development sites.
- Inventory and prioritize preservation of existing transportation infrastructure (roads, bridges, traffic control devices, lighting, etc.)
- Maintain the existing transportation infrastructure to preserve the intended function and extend the useful life.

2.1.1.2 Municipal Code

The City's municipal code contains guidance on when certain features are required to be constructed within the public right-of-way. In some cases, specific criteria cover the dimensions of pedestrian facilities. The City of Walla Walla does not have a construction design manual so the code must be relied on to provide guidance on construction standards in addition to the standard plans.

2.1.2 Design Standards

Practices and design standards that meet accessibility standards are essential to ensure new or upgraded pedestrian facilities are accessible and that these upgrades contribute to the removal of accessibility barriers throughout the City.

The City of Walla Walla maintains adopted design standard plans for curb ramps, sidewalks and pedestrian pushbuttons. These standards are used for projects within the public right-of-way that range from City funded projects as well as privately designed and constructed projects.

As a result of the ADA barrier audit, changes to the current City standards are recommended to comply with ADA requirements. These recommendations are grouped into four categories: sidewalks, crosswalks, curb ramps, signals, and other pedestrian areas. Many of the "other pedestrian areas" have minimal information within the City's standards and code. It is recommended for many of these areas to refer to WSDOT design manual to set the standards for these types of facilities. A few of the recommendations provided suggestions on improving the readability of the standard plans. The City of Walla Walla will begin revising City Standards to comply with ADA standards during Standard Plan review in the fall of 2020.

2.2 Physical Barriers

2.2.1 Data Collection

A self-evaluation of facilities within the public right-of-way was conducted by the City and employed a data collection effort that included 11 attributes for sidewalks, 8 attributes for curb ramps, and the type of detector for signal pushbuttons. Data inventory for pedestrian features was recorded into a GIS geodatabase. Attributes for features were collected by the City over the past decade with updates made during the 2014-2016 period. The inventoried data was provided to Transpo Group for analysis purposes in 2019.

Dimensions of widths and slopes were measured for sidewalks and curb ramp and locations without curb ramps were identified. Along the sidewalk segments, the number of hazards were collected. The types of hazards found are listed below.

- Vertical Discontinuities.
- Spalled sidewalk panels.
- Obstructions that reduced the pedestrian access route below 36 inches.
- Steep cross slopes.

In addition to collecting data on sidewalk and curb ramps, the type and location of pedestrian pushbuttons was also recorded at signalized locations. Post collection, signalized intersections without pushbuttons were identified. Pedestrian facility examples are shown in Figure 2-1.

The physical inventory included;

- Over 187 miles of existing sidewalks
- 2,356 existing curb ramps (additional 2,948 missing curb ramps)
- 278 existing signal pushbuttons (additional 151 missing pushbuttons)
- over 1,600 hazards

2.2.2 Findings

The following sections detail the primary barriers inventoried and analyzed for ADA compliance. The barriers found applied to curb ramps, sidewalks, discontinuities and obstacles in pedestrian routes, and pedestrian pushbuttons. State and Federal regulations dictate that curb ramps and sidewalks be ADA compliant. The result of the inventory analysis showed that many ADA features are in need of improvement to meet requirements, including over 50% of curb ramps warrant replacement.

Inventory maps of collected pedestrian features can be found in **Appendix A**.

Figure 2-1 *Examples of Inventoried Facilities*

2.2.2.1 Curb Ramps

Curb ramp compliance was divided into three overarching categories: non-compliant, minor non-compliant, and compliant. Non-compliant curb ramps represent curb ramps with greater barriers to accessibility with deficiencies like narrow or steep ramp slopes that require reconstruction. Minor non-compliant curb ramps are ones that only have attributes that produce smaller barriers to accessibility with deficiencies like missing detectable warning surfaces. Non-compliant curb ramps receive an accessibility index score equal to 30 while minor non-compliant curb ramps received a score from 1 and 29 (see Chapter 5 for details on accessibility index scores). Figures 2-1 and 2-2 show the significant elements of perpendicular and parallel curb ramps.

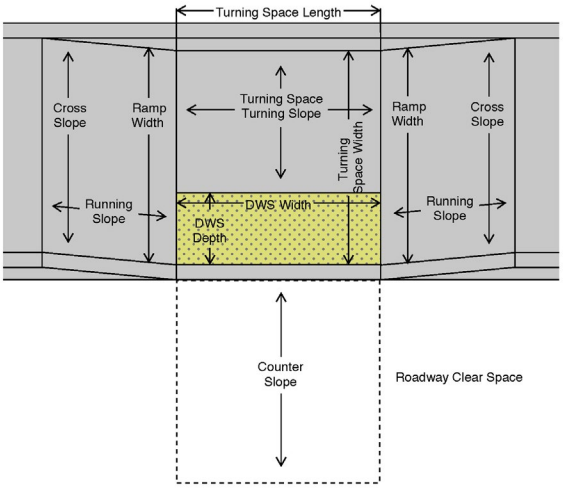


Fig 2-2 *Perpendicular Curb Ramp Attributes*

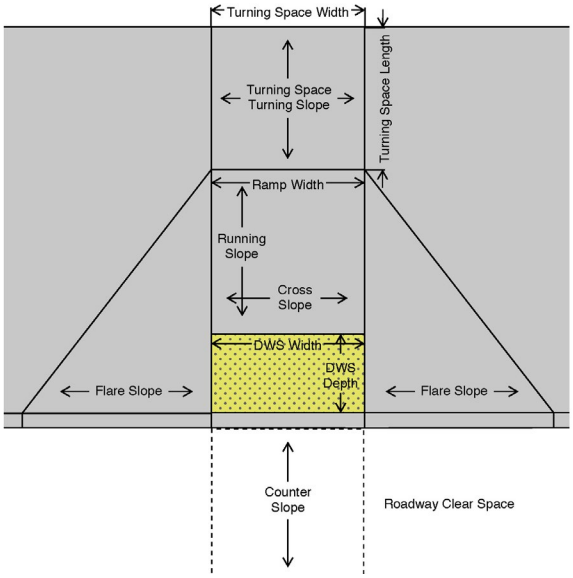
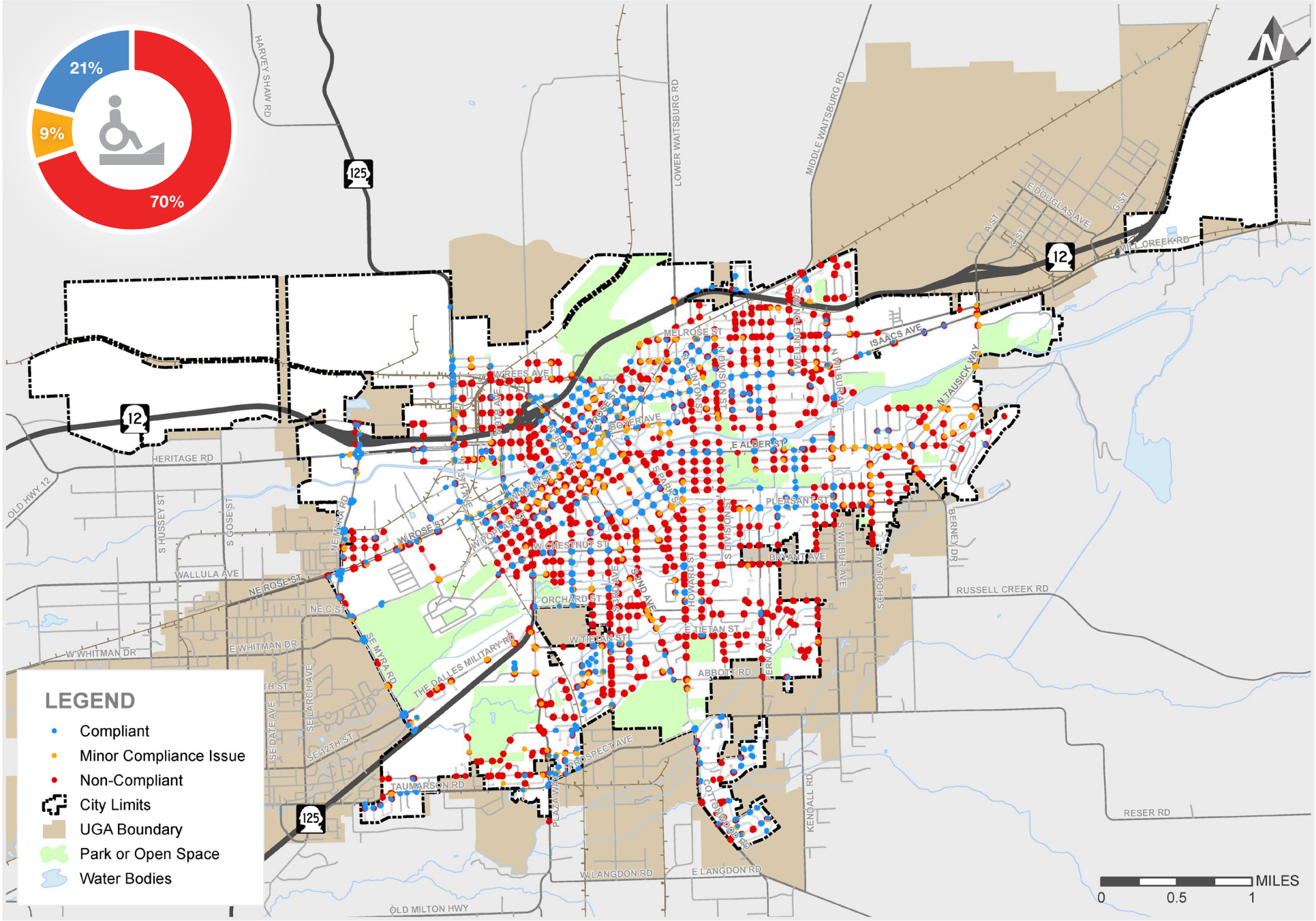


Fig 2-3 *Parallel Curb Ramp Attributes*

The findings demonstrated that 33% of the curb ramps in the city are non-compliant at a level that falls within the non-compliance classification. Figure 2-4 shows the percentage of compliant and non-compliant curb ramps and provides information on where the existing and missing curb ramps are located throughout the City. 2,948 locations are missing curb ramps and also fall into the non-compliant category.

Non-compliance is attributable to three core criteria listed below:

- The curb ramp width is too narrow (Figure 2-5). 578 curb ramps have widths less than 4ft wide.
- The curb ramp running slope is too steep (Figure 2-6). 221 curb ramps have running slopes greater than 8.3%
- The curb ramp cross slope is too steep (Figure 2-7). 219 curb ramps have cross slopes greater than 2%.



Non-Compliant Curb Ramp

City of Walla Walla ADA Transition Plan

FIGURE 2-4

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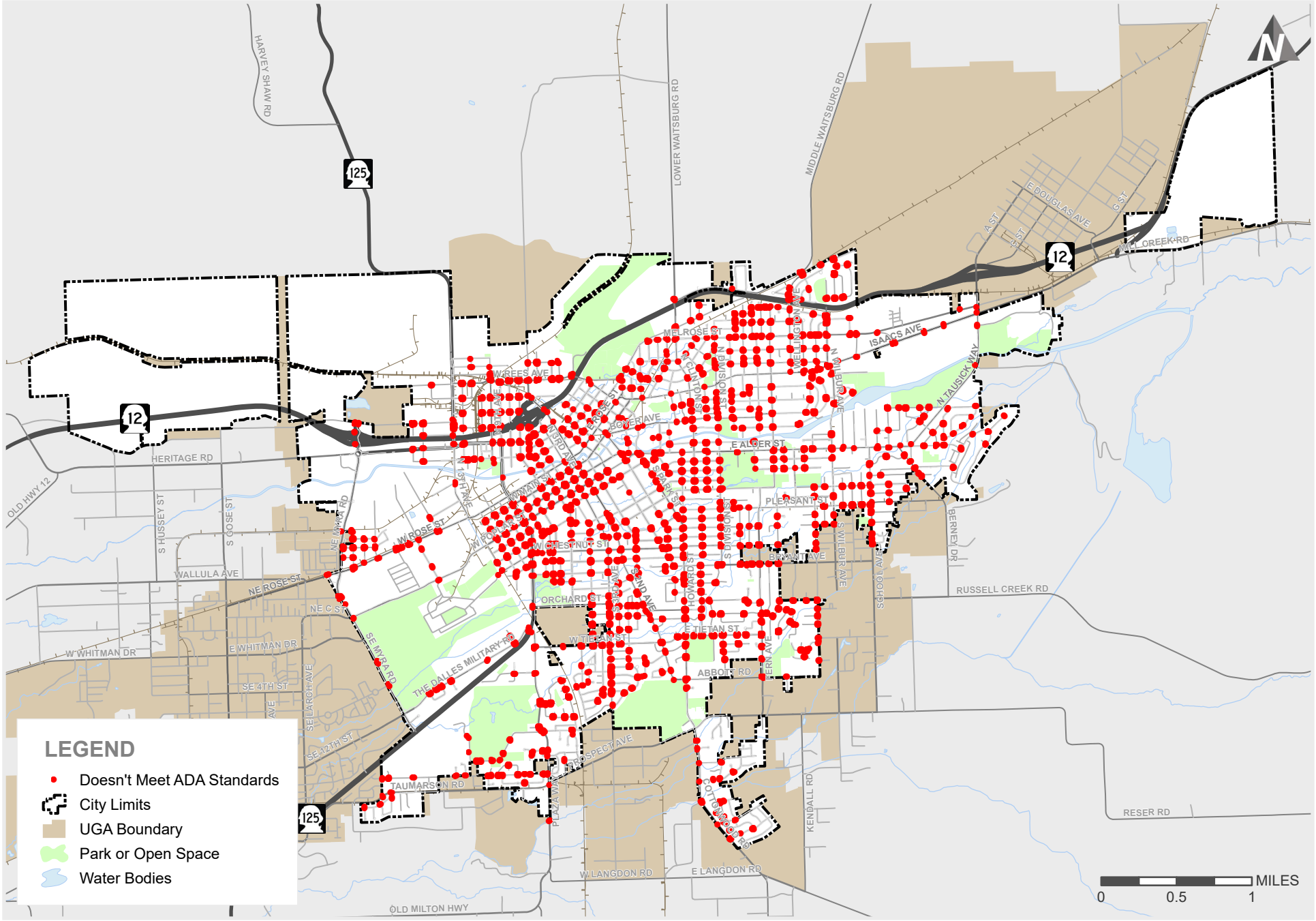

Curb Ramp Width

City of Walla Walla ADA Transition Plan

FIGURE **2-5**

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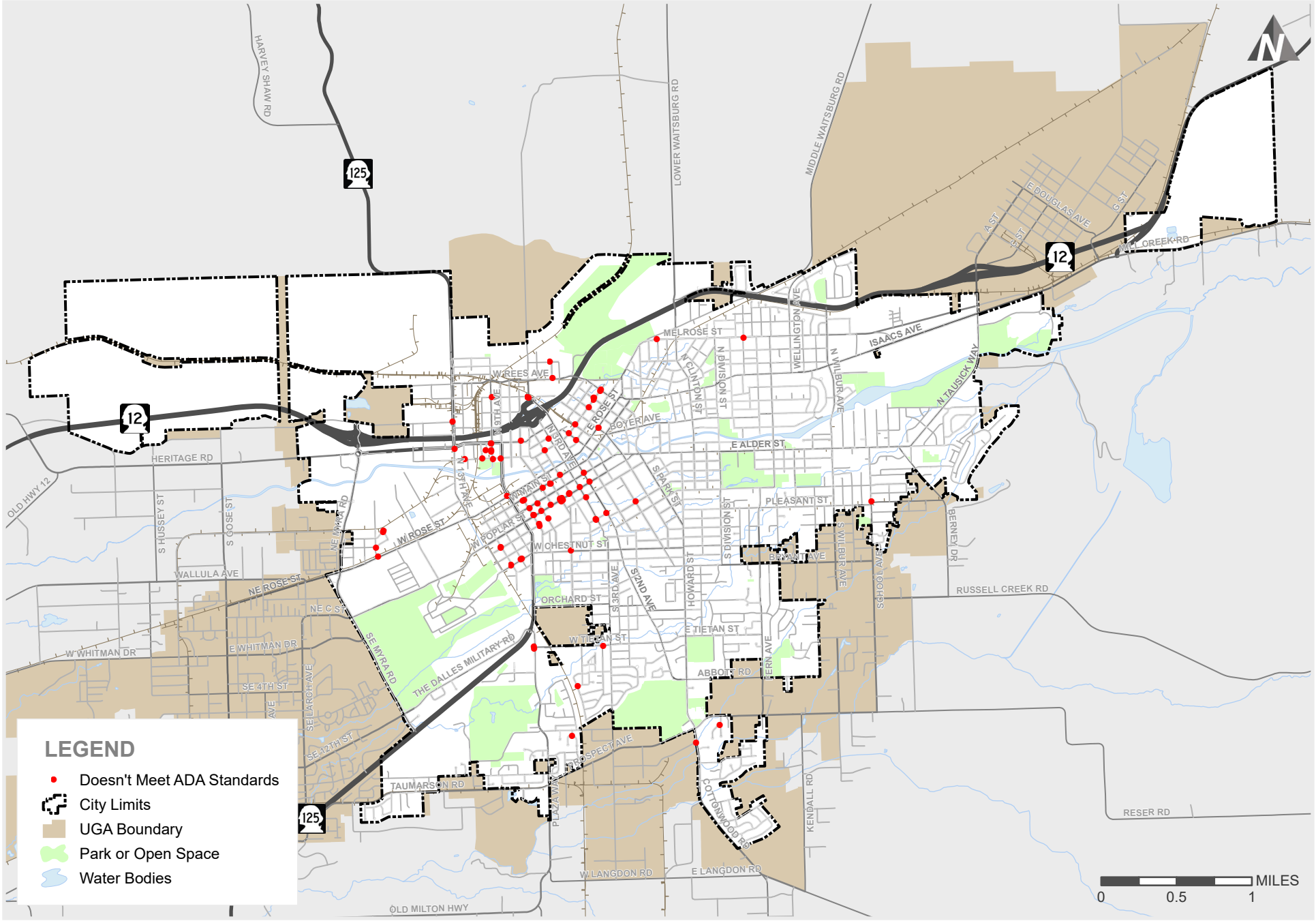

Curb Ramp Running Slope

City of Walla Walla ADA Transition Plan

FIGURE **2-6**

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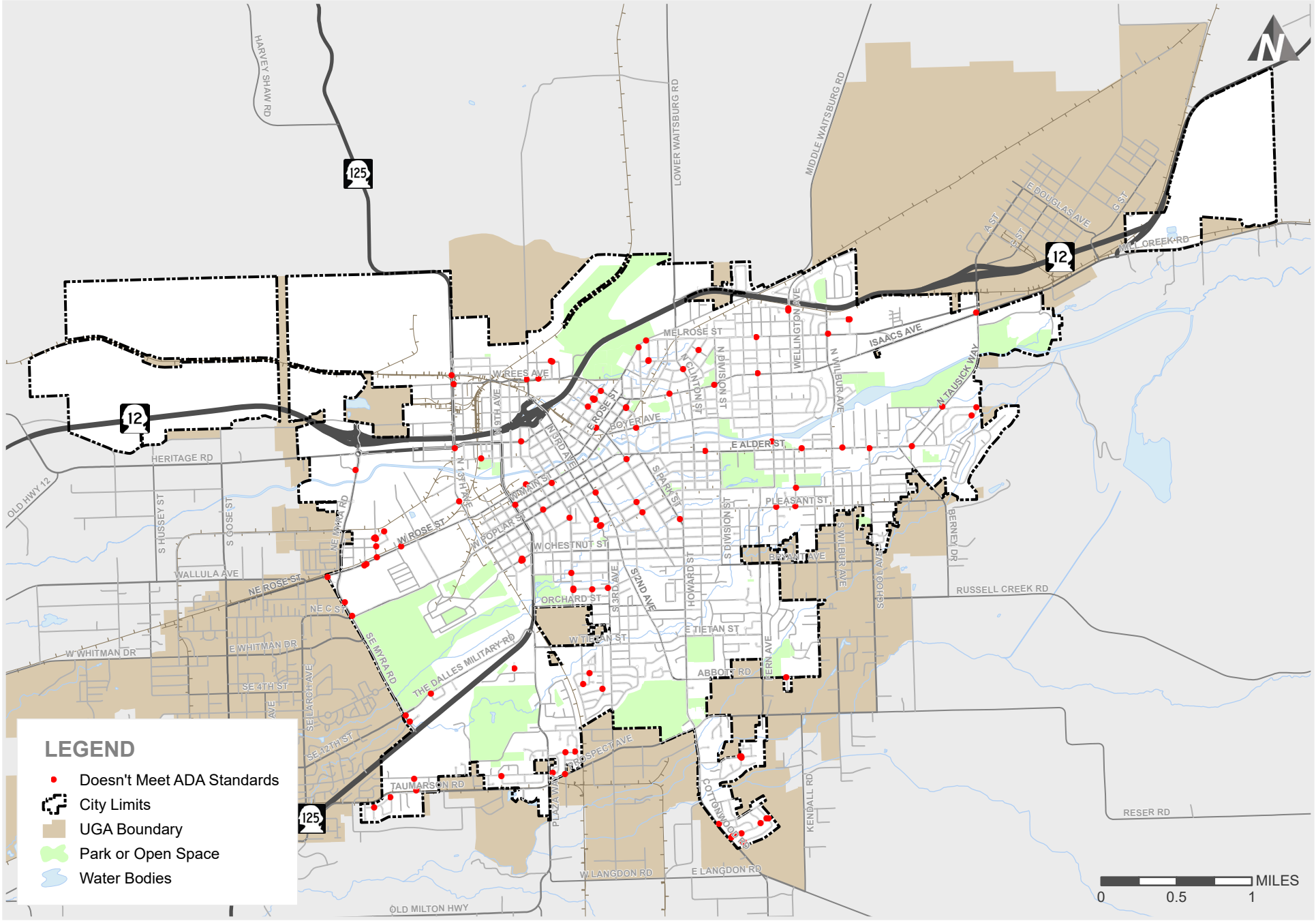

Curb Ramp Cross Slope

City of Walla Walla ADA Transition Plan

FIGURE **2-7**

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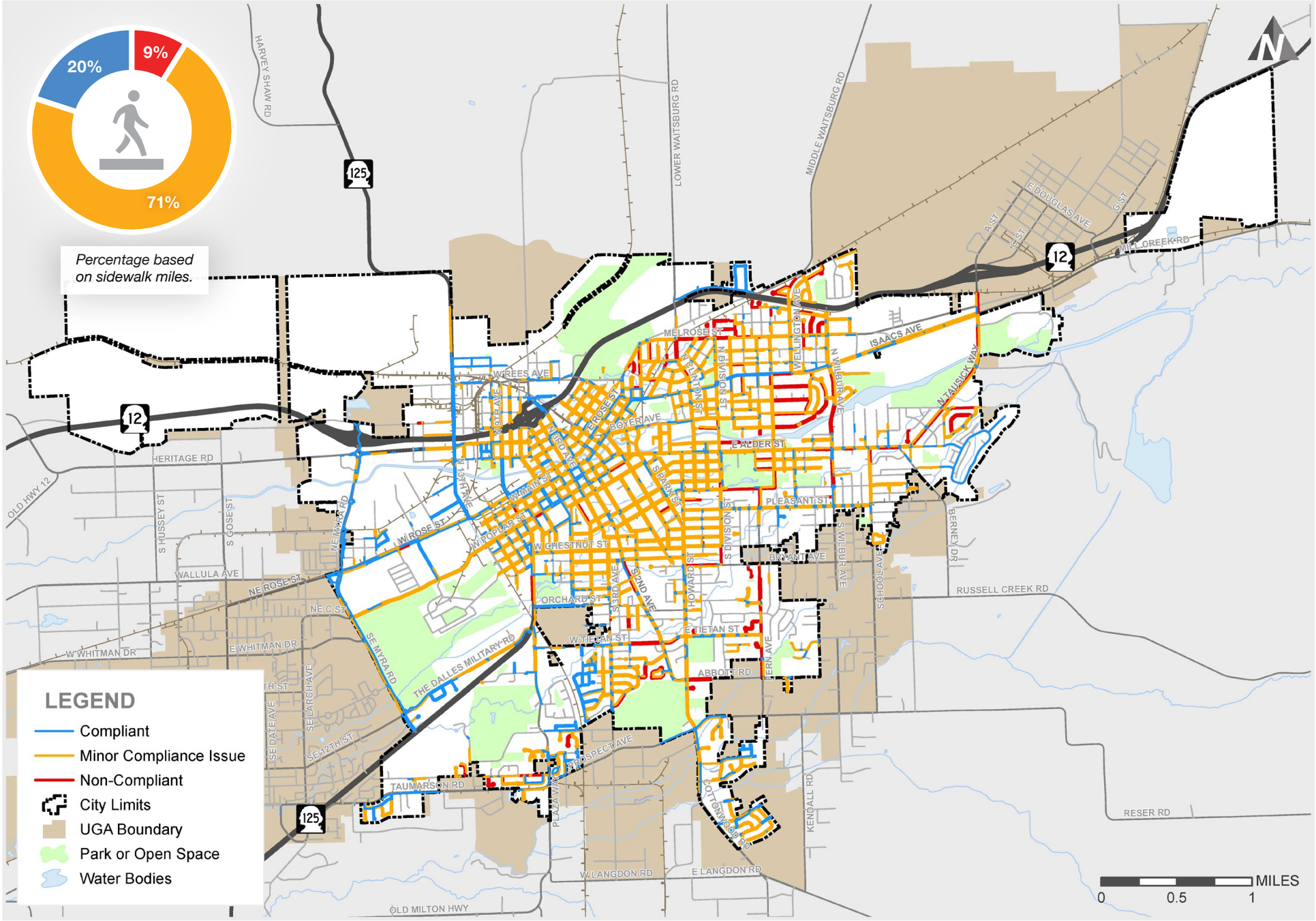
2.2.2.2 Sidewalks

187 miles of sidewalk were inventoried. Dimensions for the entire segment were recorded along with the number of panels with hazards. Figure 2-8 shows an example of an inventoried sidewalk. Sidewalk segments that received an accessibility index score from 16 to 30 were designated non-compliant and minor non-compliant sidewalk have a score from 1 to 15 (see Chapter 5 for details on accessibility index scores). Figure 2-9 shows these compliance levels throughout the City.

Figure 2-8 *Sidewalk Example*

Sidewalk non-compliance is primarily attributable to at least one of the following criteria:

- The sidewalk width is too narrow (Figure 2-10), 260 segments.
- The cross slope of the sidewalk is too steep (Figure 2-11).
- Sidewalk panels have upheaved.
- Sidewalk panels are spalled, 4,368 panels.
- Sidewalk panels have vertical Discontinuities. There were 5,636 discontinuities less than ½ inch and 4,149 greater than ½ inch.



Non-Compliant Sidewalk

City of Walla Walla ADA Transition Plan

FIGURE **2-9**

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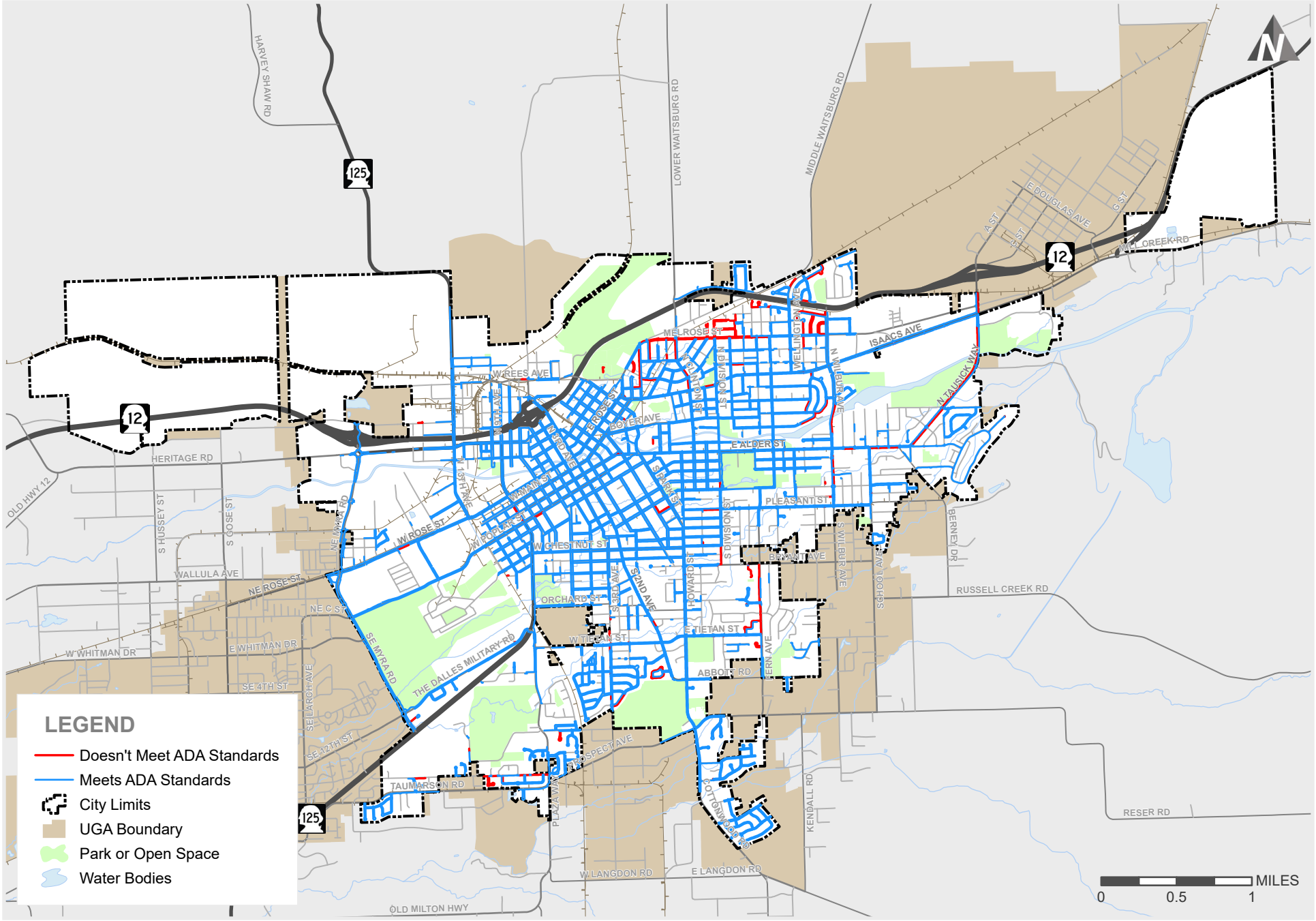

Sidewalk Width

City of Walla Walla ADA Transition Plan

FIGURE **2-10**

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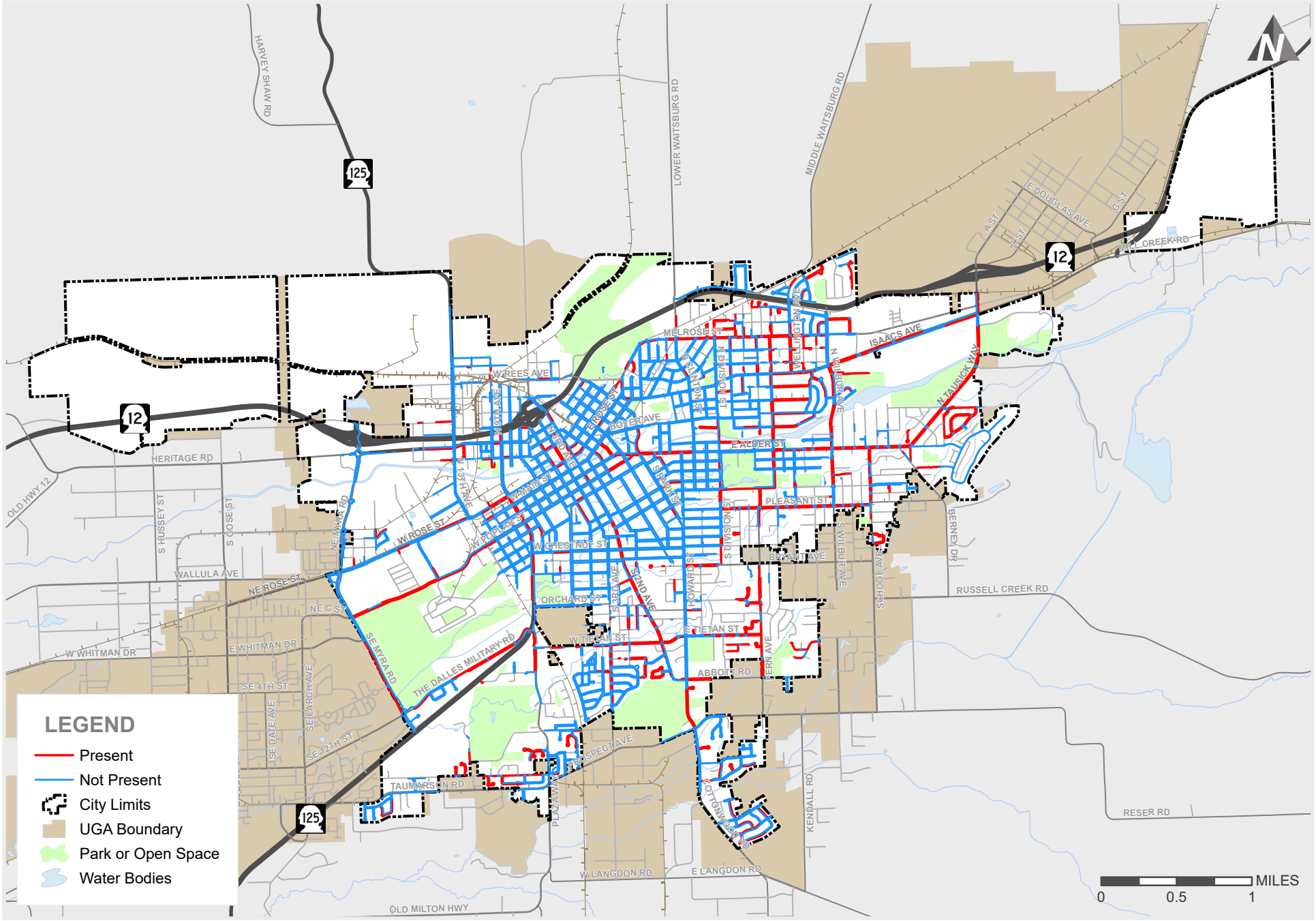

Sidewalk Cross Slope Issue

City of Walla Walla ADA Transition Plan

FIGURE **2-11**

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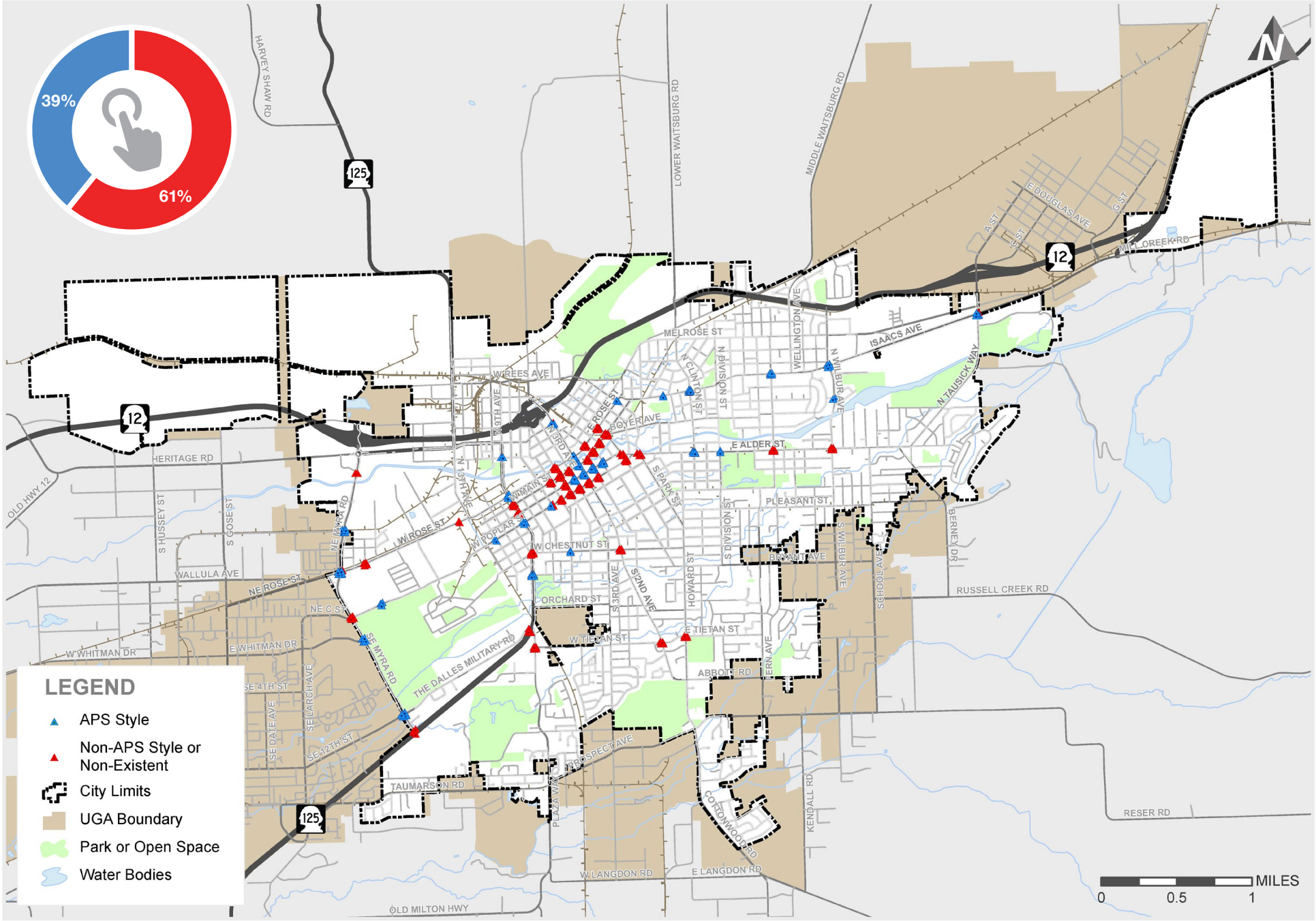
2.2.2.3 Signal Pushbuttons

Accessible Pedestrian Signals (APS) and Pushbuttons is an integrated system that communicates to pedestrians in a visual, audible, and vibrotactile manner. Some pushbuttons can be programmed to request an extended crossing time or to make the name of the street being crossed audible when pushed for a longer time. An example of an APS pushbutton is shown in Figure 2-12. The data collected for signal pushbuttons covered the type of detector and the general location of the pushbutton. There are 278 pushbuttons in the City of Walla Walla, 125 of these pushbuttons are APS style and assumed to meet current ADA requirements. Further study of these APS pushbuttons is necessary to determine if they are programed, located, and oriented correctly. This data is needed to ensure all features are consistent with PROWAG and MUTCD standards. Figure 2-13 demonstrates the percentage of what types of pushbuttons were found within the City and the locations of these pushbuttons throughout the City.

Figure 2-12 *APS Pushbutton Example*



Signal Push Buttons: APS and Non-APS Style

City of Walla Walla ADA Transition Plan

FIGURE 2-13

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3 Stakeholder Engagement

Public and stakeholder input is an essential element in the transition plan development and self-evaluation processes. ADA implementation regulations require public entities to provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the self-evaluation process and development of the transition plan by submitting comments (28 CFR 35.105(b) and 28 CFR 35.150(d)(1)). There were three primary goals for the public outreach activities prior to adopting the plan:

- Inform the public about the City's plan and processes regarding removal of barriers to accessibility within the right-of-way. Provide information to assist interested parties to understand the issues faced by the City, alternatives considered and planned actions.
- Obtain public comment to identify any errors or gaps in the proposed accessibility transition plan for the public rights-of-way, specifically on prioritization and grievance processes.
- Meet Title II requirements for public comment opportunity.

3.1 Engagement Methods

To generate public involvement and capture public feedback on the ADA Transition Plan, the City used three main methods, an online open house, survey, and focus group. To solicit participation in these activities notice was advertised on the City of Walla Walla website, Facebook, library, Union-Bulletin, and through outreach to local community service providers and advocacy groups. Groups such as the United Blind of Walla Walla (UBWW), Lily Rice Center, Walla Walla Valley Disability Network, Blue Mountain Action Council, and Valley residential Services were contacted.

The City of Walla Walla developed a project website: https://www.wallawallaada.com/

for easy on-line access to project information and ways to provide feedback which included development of a mapping tool. A full account of the public engagement findings can be found in **Appendix C.**

3.1.1 Online Open House and Survey

An 18-question survey was launched for public feedback in an online and hard copy format, both in English and Spanish. Within the online open house, a reporting tool was provided for users to provide feedback on gaps and barriers at specific locations. This survey was advertised on flyers as well as the city website and delivered to parties interested in accessibility such as social service providers, senior housing, and Veterans Administration. The purpose of survey marketing efforts was to educate the community, spread word about the plan, and encourage participation in the survey by reaching as many interested parties as possible.

The survey was made available for public participation from August 30 through October 15, 2019 and received 111 respondents. The response rate was above average compared to the population of Walla Walla, with a significant proportion of respondents who service or support those with disabilities. The survey questions focused on how people travel, if they have a disability or support someone who does, and if accessibility issues have prevented them from participating in services provided by the City of Walla Walla. Analysis of the survey showed different areas where barriers were experienced for those with a disability and those who support someone with a disability than those without a disability. These barriers were more likely to be found in sidewalks, curb ramps, and pedestrian crossings. Through the survey and online mapping tool, respondents were able to identify location-specific issues (150 locations).

3.1.2 Focus Group

The City recruited people from the community for a focus group to take a more detailed look at the ADA issues within the city. On November 15th, 2019 a two-hour focus group was held at the City of Walla Walla Police Department. This location was chosen as it is accessible and adjacent to transit services. This focus group occurred after the survey was closed to allow for discussion of the survey results and comments to occur during the focus group. During the focus group, the following topics were covered: general and specific issues, specific locations, areas that may not be addressed by the plan and priorities. The top three priorities identified from the public engagement were parks, schools, and downtown.

3.2 Meeting ADA Standards

Per 28 CFR 35.150(d)(1), public involvement is required as follows: A public entity shall provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the development of the transition plan by submitting comments. A copy of the transition plan shall be made available for public inspection.

The Draft City of Walla Walla Transition Plan was made available for a public review and comment period. A link to the draft plan was provided on the City's project website.

The City has engaged with the public for feedback on developing the ADA transition plan in a manner that meets Title VI of the Civil Rights act. Title VI of the Civil Rights Act of 1964 is a Federal statute and provides that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. This includes matters related to language access or limited English proficient (LEP) persons.

4 Barrier Removal

Removal of accessibility barriers is the primary purpose of ADA transition plans. The following section documents the primary methods of barrier removal the City currently has in place. This section also provides recommended changes to city policies, practices and design standards to comply with state and federal requirements related to ADA accessibility.

4.1 Barrier Removal Methods

The City currently has a variety of barrier removal methods that are funded from sources such as grants, general transportation funds, and utility billing. Certain programs provide continual means of barrier removal while others vary based on outside influences such as permitted development and grants. For these methods to be effective, City practice and design standards must comply with federal ADA guidance. If standards are not updated and enforced, new or reconstructed pedestrian facilities may not be constructed to accessible standards, requiring costly revision, and increasing the duration it will take the City to remove accessibility barriers.

4.1.1 Transportation Fund

Transportation funding is received principally from utility taxes and gas taxes and is used for street division operations, matching funds on grant applications, and to fund transportation related capital improvements. Below is a list of different programs that are funded by the general transportation fund.

- Sidewalk Program:
  - Street Fund – Used for upgrading existing sidewalk facilities.
  - Annual Community Development Block Grant (CDBG) – Walla Walla has designated status as an entitlement city under the Community Development Block Grant program. The funds provided by this grant are intended for serving low- and moderate-income individuals. The current target area for these funds is in the 9205 and 9206 census tracts but can be applied to curb ramps outside of these tracts.
- Bridge Program:
  - Street Fund
  - Grant applications
- Street Division Operations

4.1.2 Transportation Benefit District (TBD)

Established in November of 2011, the principal purpose of the TBD is for raising revenues to fix streets in the City of Walla Walla. The voter approved tax implemented a 0.2% sales tax within City Limits. The current TBD sales tax is set to expire at the end of June 2022. The City will place the TBD program on ballots again in the Fall of 2021.

4.1.3 Infrastructure Repair and Replacement Program (IRRP)

Established by the City Council in April 2010, the IRRP program was funded by a six-year stepped utility rate increase. Program funding included an $8.82M revenue bond that was re-paid over the first six-year period (2010 – 2015). With the bond paid off and the stepped utility rate increase fully implemented, the IRRP program generates approximately $4.8M per year in total revenue from utility bills. This translates to approximately 0.94 linear miles of infrastructure (water, sewer, street) replaced per year, with a proportion of this replacement going towards ADA barrier removal. The predictable nature of this revenue source lends itself to provide matching funds

for outside grant/loan funding sources. This funding has shown and will continue to show its ability to be leveraged against outside funds.

4.1.4 Water, Wastewater, and Stormwater Utility Projects

Within the City, there are multiple types of utility projects that can come with ADA barrier removal components. When there are utility upgrades, pedestrian facilities are often required to be replaced to complete the installations.

4.1.5 Traffic Signal Upgrades

The City upgrades existing traffic signals for a variety of reasons, often with the goal of reducing vehicle congestion. When these upgrades occur, the City has the opportunity to ensure that push buttons and pedestrian signals meet current accessibility standards including button location and position, non-visual format of indicating "WALK" and "DON'T WALK" using audible tones, and vibrotactile surfaces. The funding to complete these upgrades typically comes from grants.

4.1.6 Permitted Development

Even with the current funding for accessibility improvements, it will take many years to remove accessibility barriers or provide sidewalk connections between gaps. Redevelopment of properties such as construction of new housing or commercial buildings or major remodels can provide a valuable boost to barrier removal efforts. Enforcing City design standards that meet ADA requirements for frontage improvements will help ensure facilities built by private development are accessible.

4.2 Barrier Removal Recommendations

An assessment of City policies, practices and design standards, as documented in Chapter 2, was conducted to understand the process that results in barriers to accessibility. This assessment was informed through a review of adopted City plans, field observations, discussions with City staff and a detailed design audit of the City's Public Works Standards (see **Appendix B**).

The recommendations included below were developed in response to this assessment and have been written in such a way that recommended actions are clearly identified and progress on each specific recommendation can be easily tracked and updated.

Recommendation 1:

Update City design standards to match ADA Standards

Status: Underway

A detailed audit of City design standards using *Proposed Guidelines for Pedestrian Facilities in the Public Right-of-Way 2011* (PROWAG) was conducted to inform Chapter 2. This audit, which is included in **Appendix B**, recommends specific changes and additions to the City's standard plans and municipal code. Recommendations were identified for updating existing sidewalk, curb ramp, and pushbutton standards and filling in ADA guidelines for areas not covered in the City's standards and code. The City should update these documents to meet PROWAG standards.

Recommendation 2:

Identify an official responsible for Transition Plan implementation within the Public Works Department

Status: Complete

Elizabeth Chamberlain, Deputy City Manager, has been identified as the official responsible (see Section 6.1 for more information). This position, often referred to as the "ADA Coordinator", is one of the four major federal requirements for every ADA transition plan. The ADA Coordinator is responsible for facilitating city transition planning such as responding to grievance requests. They also function as a central figure for organizing the various programs and departments within the City to maintain a consistent approach to barrier removal and ADA standards enforcement in multiple aspects of city operations.

Recommendation 3:

Adopt a Citywide Accessible Pedestrian Signal (APS) policy

Status: Pending

Accessible Pedestrian Signal (APS) policies serve as a means for cities to be consistent with ADA requirements at traffic signals. The APS policy covers when installation of APS devices that "communicate information about pedestrian timing in non-visual formats such as audible tones, verbal messages, and/or vibrating surfaces" (MUTCD) is required. The recommended APS policy is included in **Appendix D**.

Recommendation 4:

Educate City staff, consultants, and contractors on ADA standards

Status: On-going

Transition plans are often a learning experience for City staff, consultants, and contractors alike since they change existing practices and expectations. The City should use updates to the City's design standards as an opportunity to teach and learn about accessibility and the barriers that those with limited mobility or sight experience when traveling in the City's public right-of-way. Education can take many forms from review of updated design standards with key individuals such as field inspectors and contractors, development and review of City specific design standards or checklists with City engineers, or training from groups that serve those with disabilities.

Recommendations 5:

Develop a standard grievance process for barriers to accessibility

Status: Underway

Public entities subject to Title II of the ADA are required to adopt and publish a grievance procedure as part of their transition plan. A grievance process allows community members to formally report denial of access to a City facility, program, or activity on the basis of disability.

A process like this could include a two-step approach to comply with the requirement for grievance procedures. The first step of the process would be to file a "Request for Service" and the second step to file for a "Grievance".

A Request for Service allows the public to request accommodations or barrier removal. A request should be possible in-person, by telephone, by mail, or via e-mail and documented by the City of Walla Walla. Information on how to file this should be easily accessible. The recording of the request is critical for record-keeping and to evaluate the Department's response to ADA-related requests.

The second step, a Grievance, is used to report denial of access to a City facility, activity, or program. A Request for Service should be required prior to submitting a grievance. The City should then acknowledge, review the filing, and respond within a set number of days upon receipt. A clear process for appeal of a Grievance decision should be communicated if a denial is issued.

Currently, two related processes are established by the City, the Online Reporting Tool and the Grievance Procedure. The online reporting tool can be accessed via links on the City's website and the Grievance Procedure is in Appendix I of the interim ADA transition plan and included in **Appendix E** of this report**.** A review of the City's current grievance policy resulted in the following recommendations.

The following adjustments are recommended to the City's service request and grievance process:

- Make the service request/grievance process easily navigable from the main website.
- Revise the City's website to more clearly define the service request/ grievance process as a two-step process and provide clearer directions on how to follow these steps.

- Ensure that the City's website and pdf forms are accessible using common screen readers and provide alternative ways of filing this form. This could include providing a fillable web form and/or contact information to submit a service request or grievance verbally as alternatives to the existing pdf form.
- Incorporate requests for service by providing web form for requests for physical alterations.
- Add a self-evaluation process in the request for service stage that includes additional data collection in the area of the complaint. Use this additional data collection to supplement the existing inventory database and to better inform the response to the service request.

Example possible changes to the City's webpage are as follows:

1. On the main City of Walla Walla ADA Project Overview page (https://www.wallawallawa.gov/government/public-works/adaproject):

   - Create a link to 'Request Accommodations/File a Complaint/ Grievance' on this web page. For example, add an additional side panel under the contact card that state '*Service Requests and Grievances' (opens in a new tab)*.

     Add text on the new linked page to say:

     ADA Accessibility Service Requests and Grievances

     'Are you a person with a disability and would like to request an accommodation or report a barrier to access? Please follow our Service Request and Grievance Process to let us know how we can help you.'

     Service Requests:

     If you are experiencing a barrier to access to a City program, service, or activity, please let us know! There are several ways you can contact the City:

   - Online:
     - Fill out a Service Request form (opens in a new tab and links to the online reporting tool) to report physical barriers like impassable sidewalks/curb ramps, etc. or broken, inoperable, or inadequate accessible facilities in buildings such as electric door assists, elevators, etc.
     - Fill out a Request for Reasonable Accommodation (opens in a new tab) to request auxiliary communication aids such as interpreters, assistive listening devices, brailed or large-print materials, etc.
   - Phone: 509.527.4540
   - Email: ada-titlevi@wallawallawa.gov
   - In-person: 15 N 3rd Ave
     Walla Walla, WA 99362

     The City will make every attempt to provide the type of service requested. The department's contact or ADA/504 Coordinator will consult with the requestor to identify in what ways an effective accommodation can be provided in the context of the department's program, service or activity. The department's contact person or ADA/504 Coordinator may ask the individual with the disability for technical assistance and information.

     Grievance Filing:

     The City has established a Grievance Procedure (opens procedure in new tab).

     If you have submitted a service request and feel the City has not made a reasonable effort to accommodate you, you may file a Grievance Intake Form (opens a new tab).

2. On the City's contact page add a link to the Service Requests and Grievances page.

Recommendation 6:

Develop a consistent and centralized MEF documentation database

Status: Pending

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

> *Each facility or part of a facility altered by, on behalf of, or for the use of a public entity in a manner that affects or could affect the usability of the facility or part of the facility shall, to the maximum extent feasible, be altered in such manner that the altered portion of the facility is readily accessible to and usable by individuals with disabilities, if the alteration was commenced after January 26, 1992.*

The City of Walla Walla should adopt a MEF documentation process and standard template for the documentation of maximum extent feasible when addressing new or altered construction. Each project to remove barriers should be evaluated to determine if improvements to the facility are feasible in the engineering design phase. Some barriers may be infeasible to remove or may be removable only to a point. Where this is the case the City should document the reason for the variation from accessibility standards. This documentation should be stored in a centralized location and be linked to the City's GIS ADA self-evaluation database and/or asset management software to ensure consistency of data.

Consolidation of past MEF records into this data is also recommended. A template example has been provided in **Appendix F**.

Recommendation 7:

Develop performance measures and processes to track removal of barriers

Status: Pending

The primary purpose of an ADA transition plan is to develop a plan for removal of accessibility barriers. In order to show progress towards this requirement, the City should develop a process of tracking barrier removal on a year by year basis. It is recommended that the City actively update the GIS ADA self-evaluation database developed for this plan, tracking how and when ADA barriers are removed. This data can be used to provide annual updates on progress and demonstrate to the public as well as federal regulators that the City is making progress to meet Title II requirements.

Recommendations 8:

Increase funding sources for ADA barrier removal

Status: Pending

The City should consider allocating greater funding for ADA related projects as they relate to existing infrastructure. This would allow the barrier removal timeline to be reduced.

Recommendations 9:

Continue data collection for pedestrian features in the public right-of-way

Status: Pending

The City should continue their data collection efforts to complete their database of pedestrian facilities in the public right-of-way. Attributes that are part of the PROWAG standards but not included in the first round of collection should be added to the GIS database as well as new types of facilities not inventoried like street parking, crosswalks, and bus stops. A review of the existing APS style pushbuttons should also be completed in order to confirm they have been installed correctly. As construction projects within the City enter into the as-built phase, pedestrian facility data should be collected and entered into the GIS Database to enhance the barrier removal tracking process.

5 Implementation

5.1 Approach

Development of an implementation plan and transition schedule included three steps once the Citywide barrier evaluation was complete. First, all facilities with an identified barrier were prioritized. Next, a planning level cost estimate was developed to provide an estimate of the financial resources needed to remove all barriers. Finally, a schedule was developed based on the annual financial resources the City currently utilizes for projects that include removal of barriers. This schedule will help inform recommendations for additional funding for barrier removal. The following chapter describes these steps in more detail.

5.2 Prioritization

To focus the City's efforts toward facilities that pose the largest barrier within the public right-of-way, an analysis of the accessibility of each pedestrian facility and its proximity to public destinations such as schools, libraries, parks, transit, and city buildings was completed. The result of this analysis is a prioritized list of pedestrian features with the highest benefit features identified for removal first.

To complete this assessment, a multi-criteria analysis was conducted to determine which facilities do not meet existing sidewalks, curb ramp, and other pedestrian facility standards. Each attribute collected in the field was compared against PROWAG requirements as outlined in Chapter 2.

If the facility did not meet ADA requirements or best practices, accessibility points were assigned and if the facility was located near public destinations location points were given to that facility. The number of points was dependent on the relative barrier to access or level of proximity. Pedestrian features with poor compliance and a number of proximate destinations received a high score and are prioritized for removal while compliant ramps far from public destinations have a score of zero. Missing curb ramps are assigned the maximum number of accessibility points.

5.2.1 Accessibility Prioritization (Accessibility Index Score)

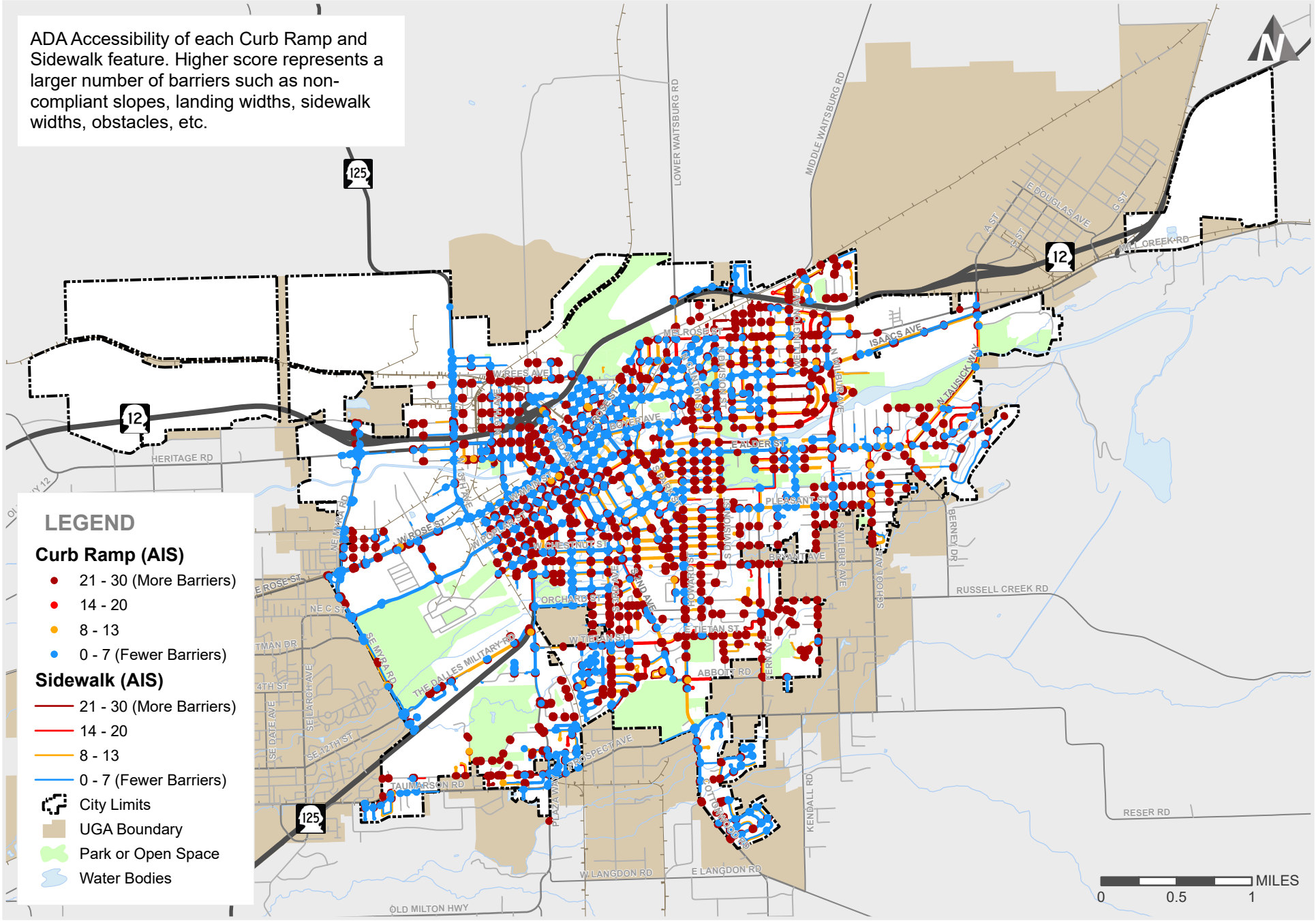
A set criterion was used to establish the extent to which each pedestrian facility did or did not present a barrier to accessible mobility. Table 5-1 shows these criteria, the threshold used to identify them as a barrier, and the score used to indicate the severity of each barrier relative to each other.

Facilities with a higher Accessibility Index Score (AIS) presented a large accessibility barrier and are shown in Figures 5-1 and 5-2 are shown in dark red. Facilities with fewer or no barriers are shown as blue.

The sidewalk and curb ramp AIS rely on a condition rating that compares the values measured for an attribute to the ADA standard. For example, the maximum cross slope of a curb ramp, 2%, is subtracted from the measured cross slope value. The resulting number is one of the values that is combined to create the condition rating. The AIS is cumulative, a sum of each criteria that is triggered by the given threshold with a maximum value of 30.

Table 5-1 *Sidewalk, Curb Ramp, and Signal Pushbuttons Accessibility Index Score Value*

ACCESSIBILITY INDEX SCORE	CRITERIA	THRESHOLD	SCORE
Sidewalks	Width	< 48 inches	5
	Vertical Discontinuity	Present	4
	Cross Slope Issue	Present	3
	Sidewalk Condition Rating	(SCR) > 100	3
	Sidewalk Condition Rating	(SCR) >= 81	3
	Sidewalk Condition Rating	(SCR) >= 61	3
	Sidewalk Condition Rating	(SCR) >= 41	3
	Sidewalk Condition Rating	(SCR) >= 21	3
	Sidewalk Condition Rating	(SCR) >= 01	3
	Maximum Sidewalk (AIS) Score		30
Curb Ramps (Max. Score)	Ramp Width	< 48 inches	30
	Ramp Running Slope	> 8.3%	30
	Ramp Cross Slope	> 2%	30
Curb Ramps	Turning Space Running Slope	>2%	3
	Turning Space Cross Slope	>2%	3
	Truncated Domes (DWS)	No	3
	Ramp Compliance Rating	(RCR) >= 60	3
	Ramp Compliance Rating	(RCR) >= 50	3
	Ramp Compliance Rating	(RCR) >= 40	3
	Ramp Compliance Rating	(RCR) >= 30	3
	Ramp Compliance Rating	(RCR) >= 20	3
	Ramp Compliance Rating	(RCR) >= 10	3
	Ramp Compliance Rating	(RCR) >= 01	3
	Maximum Curb Ramp (AIS) Score		30
Signal Pushbuttons	Detector Type is APS Style Unit	No	30
	Maximum Signal Pushbutton (AIS) Score		30



Accessibility Index Score Composite (Curb Ramp - Sidewalk)

City of Walla Walla ADA Transition Plan

FIGURE **5-1**

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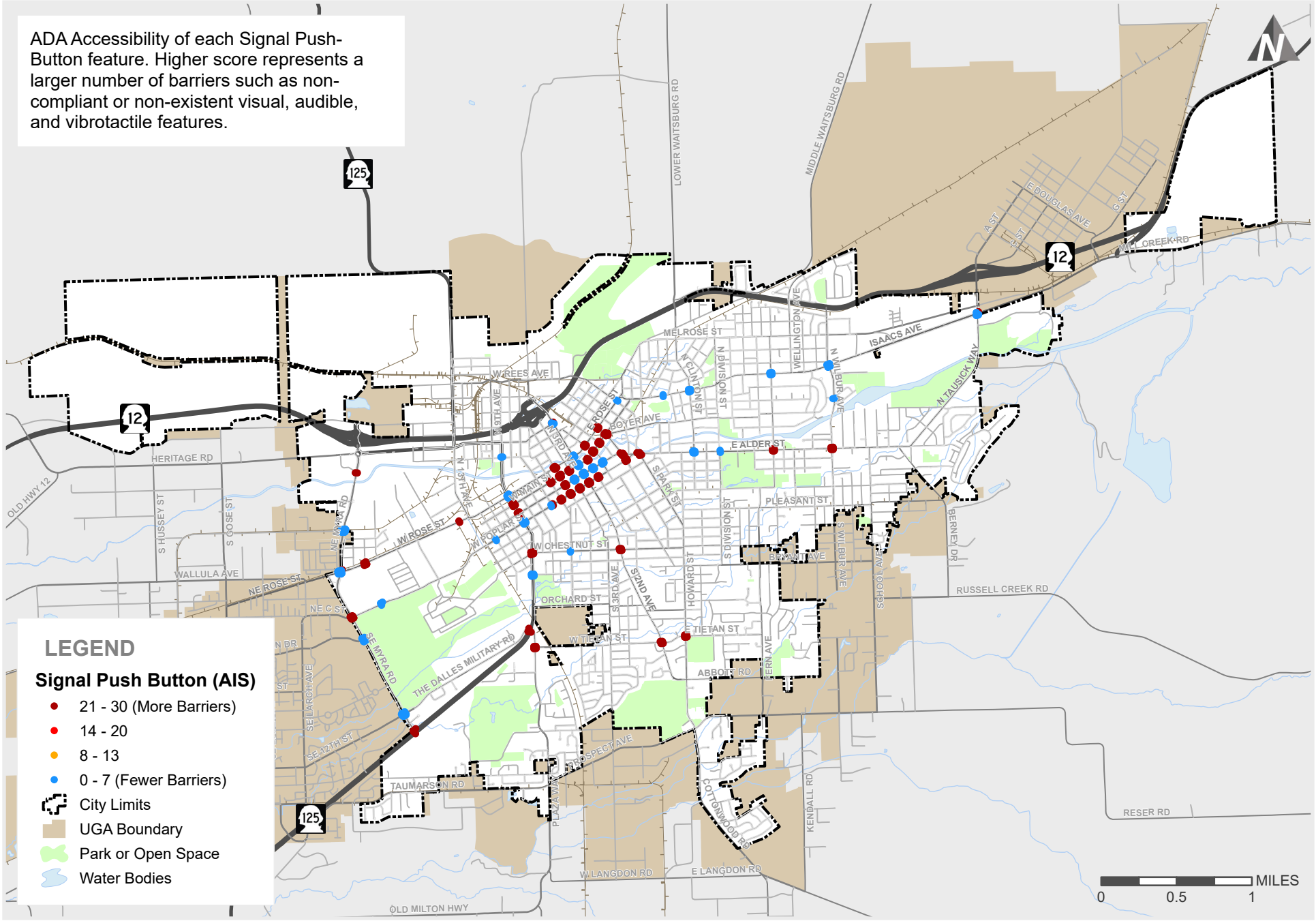

Accessibility Index Score Composite (Signal Push Button)

City of Walla Walla ADA Transition Plan

FIGURE **5-2**

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5.2.2 Location Prioritization (Location Index Score)

A number of destinations are used to identify high priority pedestrian facilities within the City. This is done by identifying public destinations such as public buildings, transit and parks and identifying pedestrian facilities within close proximity of one or more of these destinations.

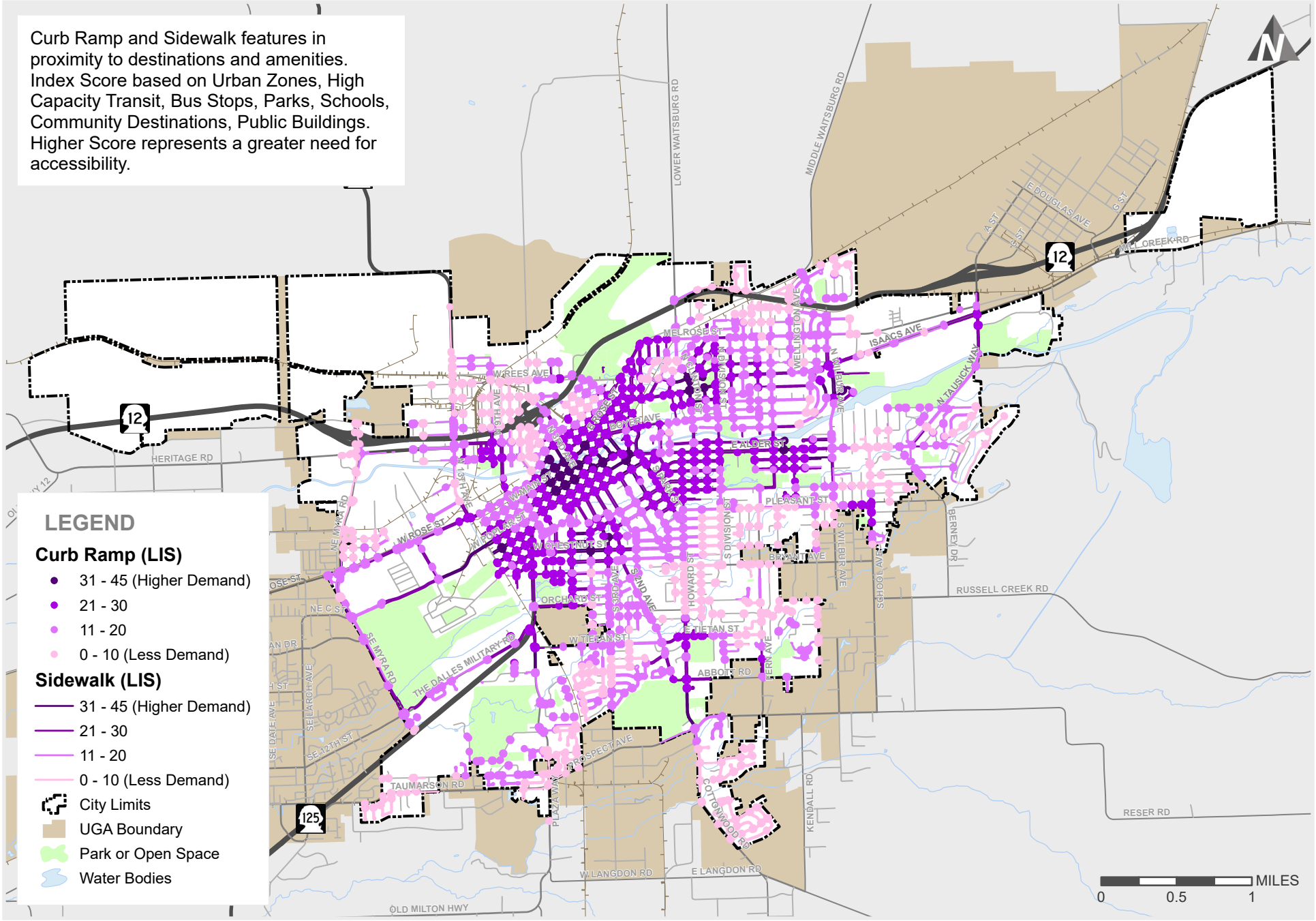
Pedestrian facilities within the identified proximity were assigned points based on each destination they are close to, as shown in Table 5-2. This measure is called the Location Index Score (LIS), which identifies high pedestrian generating overlapping areas. Ultimately the more pedestrian generators, the higher the score.

Community Defined Destinations criteria is added to the Location Index Score (LIS) following comments and results received from open house attendees, City staff, other stakeholders during engagement and public outreach. This assists in factoring in what's important to the citizens and community to help with the overall prioritization.

Table 5-2 *Location Index Score Value*

LOCATION CRITERIA	RATING CRITERIA	POSSIBLE SCORE
Schools		
Proximity to Schools	Within ⅛-mile radius of school	5
Walk-To-School Route Proximity	Within ½-mile radius of school	5
Parks	Within ⅛-mile radius of park	5
Transit		
Park and Ride	Within ⅛-mile of park and ride	5
Bus Stops	Within ⅛-mile of transit stop	5
Traffic Signal/Roundabout	Within ⅛-mile of signal or roundabout	5
Public Buildings	Within ⅛-mile of location	5
Downtown/Urban/ Commercial Business Centers	Within ¼-mile radius of Downtown, Urban and Commercial Business Center Zoning	5
Community Defined Destinations (defined by Stakeholder/ Public Engagement)	Within ⅛-mile of location	5
TOTAL LOCATION INDEX SCORE (LIS)		45

Figures 5-3 and 5-4 show the results of the Location Index Scoring. Darker locations indicate areas with a high concentration of pedestrian destinations while lighter areas represent areas with a low concentration of these destinations.



Location Index Score Composite (Curb Ramp - Sidewalk)

City of Walla Walla ADA Transition Plan

FIGURE **5-3**

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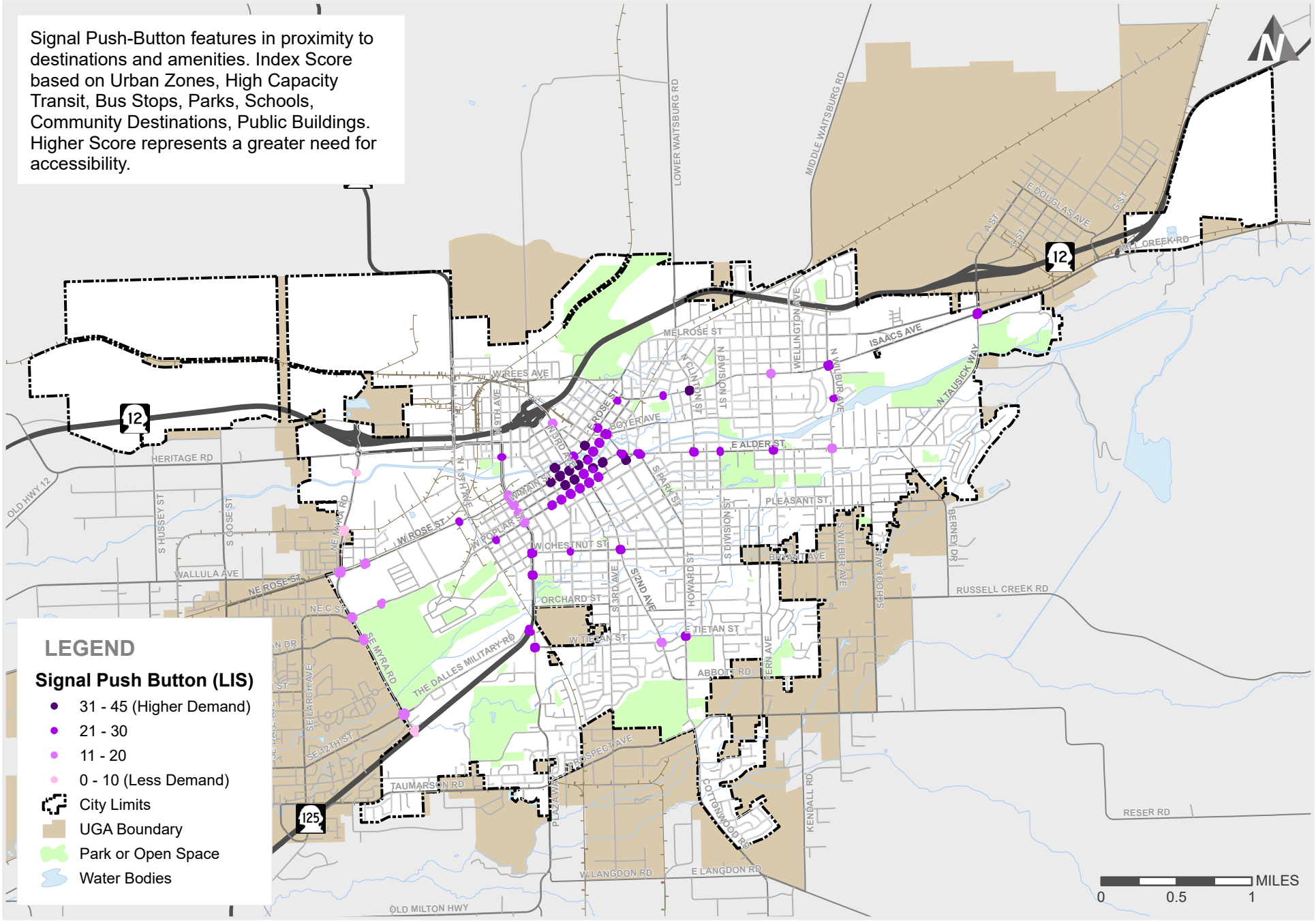

Location Index Score Composite (Signal Push Button)

City of Walla Walla ADA Transition Plan

FIGURE **5-4**

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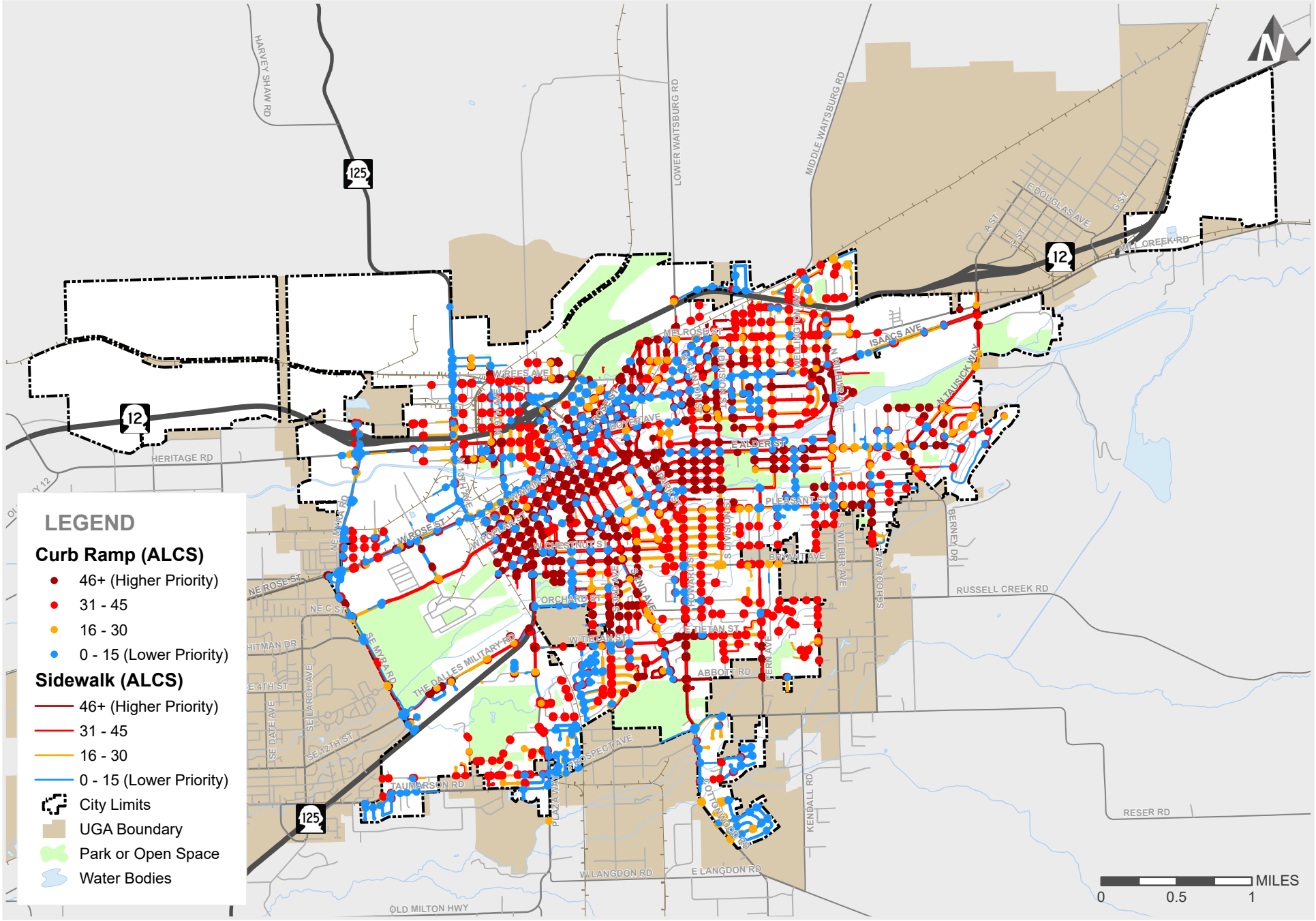
5.2.3 Barrier Removal Priorities

By combining the Accessibility Index Score and Location Index Score, a Combined Composite Index Score was developed. Together, these measures prioritize barrier removal at locations where pedestrian facilities present a barrier and where pedestrians would be expected.

Facilities with the highest score should be addressed first (46+ points) and represent facilities that present a clear physical barrier and are in high-demand areas. The next levels of priority are 'high' (31-45 points) and 'medium' (16-30 points). Facilities with the lowest scores should be addressed last (1 to 15 points), have minor barriers, and are in locations where pedestrian demand would be expected to be lower. These scores are relative, comparing one facility to the other. The ranges for medium and high priority were defined based on review of the identified barriers and assessment of the relative barrier they present. It should be noted that while some barriers have a lower priority, they still should be removed. The priority scoring is the first step to help identify barrier removal projects, but a case by case review is still required to determine barrier removal feasibility and to complete project scope planning.

Figures 5-5 and 5-6 show the combined scores.



Accessibility (AIS) & Location (LIS) Combined Score

City of Walla Walla ADA Transition Plan

FIGURE 5-5

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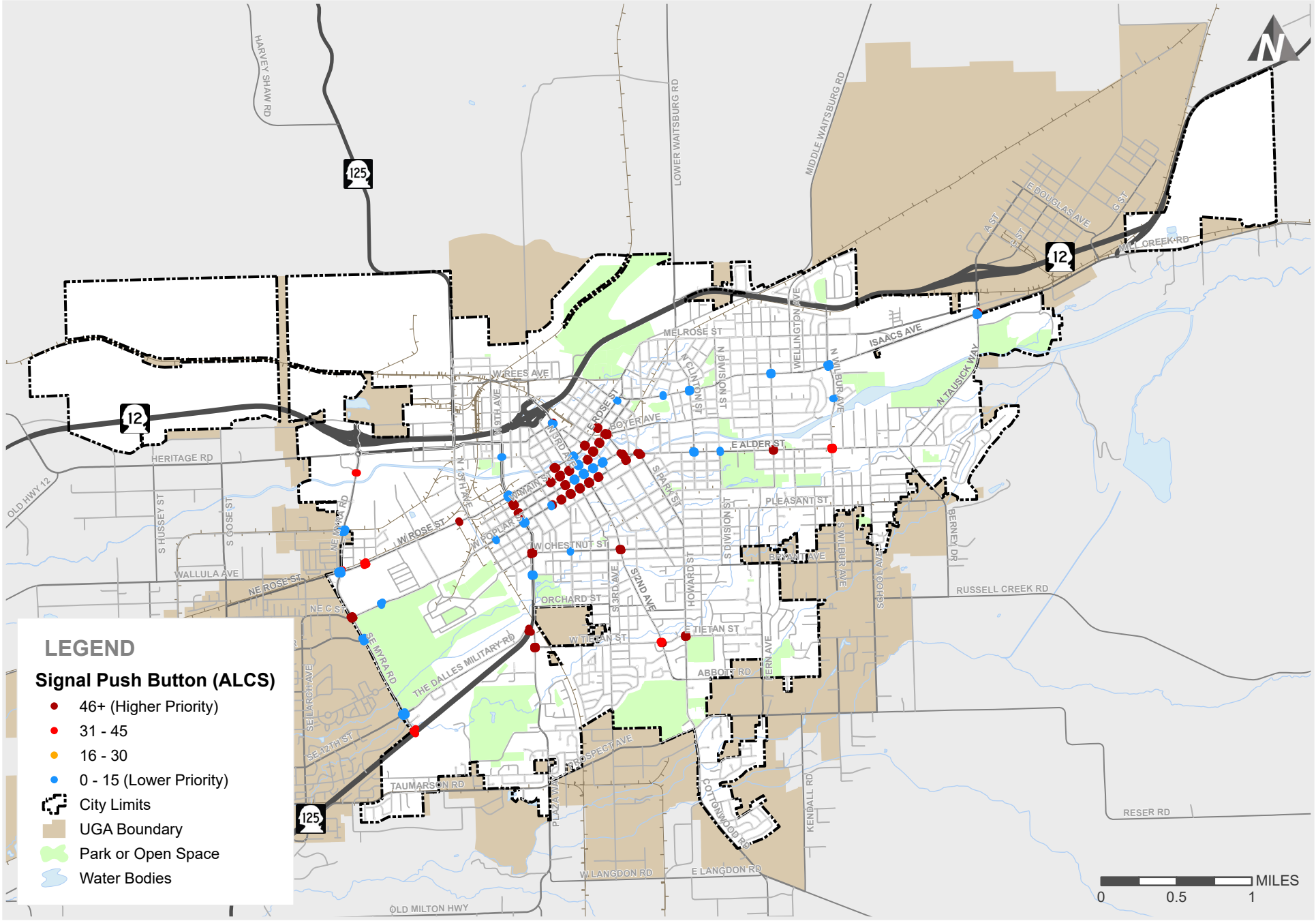

Accessibility (AIS) & Location (LIS) Combined Score

City of Walla Walla ADA Transition Plan

FIGURE 5-6

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5.3 Transition Plan Cost and Schedule

A key requirement of an ADA Transition Plan is development of a schedule which shows how long it will take the City to remove accessibility barriers. Understanding the financial resources needed to remove accessibility barriers is essential for developing such a schedule.

5.3.1 Process

Unit costs were developed to address the ADA barriers described in Chapter 2. The unit costs were developed using recent bid tabulations, input from City staff, and planning level assumptions concerning each ADA barrier type.

ADA deficiencies were totaled using their respective unit of measurement: for example, square yards for sidewalks, and number of facilities for curb ramps. To avoid overestimation of non-compliant facilities, assumptions were made when necessary to address the repeatability of the unit cost and the quantities for each item. A final cost estimate was determined using information from the data inventory and calculated using current year construction costs. Cost estimate assumptions are detailed in **Appendix G.**

Other factors such as contingency, design, mobilization and traffic control were added to the barrier removal cost subtotal. Sales tax, structural impacts to buildings, permit fees, inflation, and contingency based on future accessibility laws and codes were not captured in the cost estimate.

It is also important to note that the physical possibility of removal for each ADA barrier was not considered in developing the planning level cost estimate. It is likely that a significant portion of the ADA barriers cannot be fully removed but only improved to the maximum extent feasible. To identify these locations, the barrier will have to be reviewed on a project specific basis.

5.3.2 Planning-Level Cost Estimate

Planning-level cost estimates to remove identified barriers were developed and found for the removal of these barriers the cost would combine to $84,722,000 (2020).

This overall cost includes construction, design, mobilization, contingency, traffic control, construction management, and right-of-way acquisition. Table 5-3 shows a summary of each activity associated with barrier removal and the applicable cost of removing the specified amount of deficiencies.

Table 5-3 *Planning Level Cost Estimate*

ADA DEFICIENCY	IMPROVEMENT TYPES	TOTAL QUANTITY	UNIT COST	TOTAL COST
Sidewalks				
Non-Compliant Sidewalk	Reconstruct existing sidewalk or paved shoulder walkway	179,494 SY	$80	$14,040,000
			Subtotal	*$14,040,000*
Maintenance/Miscellaneous				
Non-Compliant Vertical Discontinuity	Sidewalk grinding (10 LF of sidewalk)	5,636 EA	$125	$705,000
Fixed Obstacles	Relocation of obstacles including utility pole, mailbox, tree trunk, etc.	86 EA	$2,500	$215,000
			Subtotal	*$920,000*
Curb Ramps				
Non-compliant curb ramp (width, running slopes, cross slopes, landing size and slope)	Remove and reconstruct existing curb ramp.	893 EA	$4,500	$4,019,000
Non-compliant curb ramp or missing curb ramp.	Remove and reconstruct existing curb and gutter adjacent to curb ramp.	69,138 LF	$105	$7,260,000
Non-compliant curb ramp or missing curb ramp.	Remove and reconstruct roadway adjacent to curb ramp.	3,841 EA	$1,020	$3,918,000
Missing curb ramps	Install new curb ramp	2,948 EA	$4,000	$11,792,000
Curb ramps without detectable warning surface (DWS)	Install detectable warning surface (DWS)	258 EA	$500	$129,000
			Subtotal	*$27,118,000*
Pushbuttons				
No APS pushbutton pedestrian detection.	Install new pole, pushbutton, and controller unit.	304 EA	$4,500	*$1,368,000*
			Subtotal	*$1,368,000*
			Total	**$43,446,000**
			Contingency @ 20%	*$8,690,000*
			Design @ 15%	*$6,517,000*
			Mobilization @ 10%	*$4,345,000*
			TESC + Traffic Control @ 15%	*$6,517,000*
			Construction Management @ 15%	*$6,517,000*
			Right-of-Way Acquisition @ 20%	*$8,690,000*
			TOTAL 2020 DOLLARS	**$84,722,000**

As described in Section 4.1, The City has a variety of funding programs that contribute to ADA barrier removal. These include transportation funding, CDBGs, and utility upgrades. Typical annual funding available for barrier removal was estimated for each program and is listed below.

- Sidewalk Transportation, $45,000
- Community Development Block Grant (CDBG), $58,500
- Bridge Funding, $29,600
- Transportation Benefit District (TBD), $80,200
- Infrastructure Repair and Replacement Program, $ 158,700
- Water Utility, $10,700
- Wastewater Utility, $51,800

To determine these annual estimates, past projects in each program were reviewed to identify the percentage of funding that went towards ADA barrier removal. A typical percentage per type of project was identified and then applied towards the City's planned projects for the next six years. The values per year were then averaged to produce an annual funding rate of $434,500.

The totals listed do not include the funding that is forecasted to be received in each program from grant funding. Over the next six years, specific grant funding has been applied for, but not yet awarded. Based on the City's recent history of successful grant awards, a forecast of potential grant funds was developed. The projected portion of grant funding for ADA barrier removal is assumed to average $150,000 per year, however actual grant awards will fluctuate year to year. With the assumed projected grant funding, the total funding available for ADA barrier removals is approximately $584,500 per year. $481,000 of this total is expected to come from utility-based funding, general transportation, and TBD. These types of funding sources are targeted at other infrastructure priorities, not necessarily on ADA barrier removal. However, barrier removal does occur by way of the federal remediation nexus to upgrade ADA facilities disturbed by or within those project areas. As such these funds cannot be assigned to projects solely based on the barrier removal priorities identified in this plan. Only the remaining $103,500 from CDBG and sidewalk transportation funds can be designated for prioritized ADA barrier removal.

5.3.3 Schedule

Based upon the self-evaluation, planning-level cost estimates, and existing funding programs; a schedule for barrier removal was developed. Due to the large investment needed to remove accessibility barriers, it is important to identify the highest priority barriers and focus resources to remove them first. The City currently makes all publicly reported ADA barriers and trip and fall locations a high priority barrier removal. Sidewalk trip and fall claims have the highest financial impact of all claims against the City. When the City receives a complaint or inquiry on deficiencies within City Right-of-way, staff survey the location using an ArcGIS collector application, document the deficiency, and place the barrier on the very high priority hazard removal list within City's GIS database.

In addition to prioritizing trip and fall locations, an analysis of the public barrier prioritization was completed to determine how many barriers found during the self-evaluation process are classified as 'very high' and 'high', 'medium', and 'low' priority as defined in section 5.2. For pedestrian pushbuttons (PPBs) the priority ranges were revised to better account for the spread of combined accessibility and location scoring (**Appendix G**).

Figure 5-7 shows a breakdown of barrier removal costs by feature type at each priority level. Highest priority level represents a significant barrier to accessibility in areas with higher pedestrian demand. The majority of barriers in the 'very high' priority category are curb ramps (42% of missing and 50% existing non-compliant curb ramps) and pedestrian pushbuttons (21% of missing and non-APS pushbuttons). Lower priority levels represent lesser barriers to accessibility in areas with lower pedestrian demand. Although some facilities will receive low ratings, all barriers associated with them will still need to be removed.

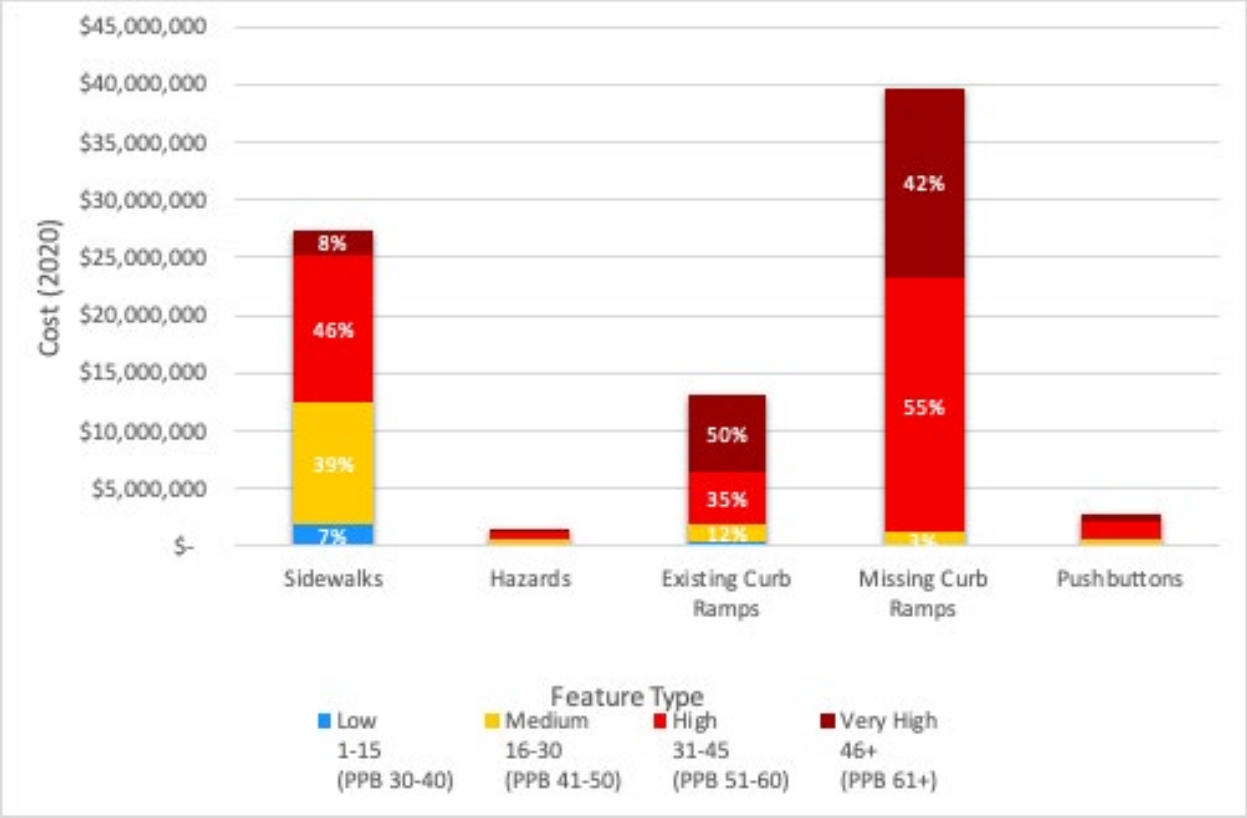

Figure 5-7 *Barrier Removal Costs by Priority Level*

A 40-year plan was developed to target removal of the highest priority barriers which are projected to cost $26,012,000. By removing the highest priority barriers first, the City works towards providing better access to the most needed programs in the shortest timeframe possible. The existing funding for priority barrier removal is approximately $103,500. Current funding for barrier removal from utility, bridge, and TBD projects is $481,000 which is none prioritizable as removal occurs when these projects are adjacent to existing barriers. Table 5-4 shows the breakdown of funding available to each barrier priority level.

Table 5-4 *Available Funding by Priority Level*

PRIORITY LEVEL	AVAILABLE FUNDING (WITHOUT GRANTS)	AVAILABLE FUNDING (WITH GRANTS)
Very High	$134,500	$172,000
High	$134,500	$172,000
Mid	$82,750	$120,250
Low	$82,750	$120,250
Total	**$434,500**	**$584,500**

Approximately $500,000 in additional annual investment directed towards the 'very high' priorities will be needed to remove the 'very high' priority barriers within 40-years. During this time period barriers at lower priority levels will continue to be removed, but the additional annual funding will focus on the 'very high' priorities. To remove all barriers within a 40-year period an additional $1.7 million annually will have to be prioritized towards ADA barrier removal. Since the costs and funding are in 2020 dollars, inflation will affect the schedule as will additional sidewalk defects that occur over time.

After determining the anticipated annual investment, the City should create a 5-year barrier removal program with a list of projects to remove specific barriers. The 5-year program should focus on the highest priority barriers. The purpose of the 5-year program is to make progress in barrier removal but also to provide a way to reassess the 40-year plan and measure incremental progress. In order to inform the 5-year program, a scoping effort should occur that includes site visits for areas identified as a high priority to determine the severity of the barrier and to brainstorm possible solutions to fix the issue. When selecting projects, site conditions and improvement feasibility should be taken into account. Areas with multiple barriers within close proximity can be grouped together to achieve cost savings. As areas are identified, additional data collection should be completed in the vicinity of the highest priority barriers and added into the facility's GIS database. The additional information will be able to provide the remaining attributes necessary to determine if a facility fully meets PROWAG requirements.

At the end of the 5-year program the City should reevaluate the duration of barrier removal based on the progress made. If progress is slower than anticipated, additional funding may be required. If progress is faster than anticipated, a shorter timeline may be achievable. Several factors may contribute to differences between the estimated transition schedule and the actual rate and cost of implementation. Some of these factors include actual funding acquired, individual project cost, site specific design savings, additional deterioration of pedestrian facilities, and unanticipated capital projects. In addition, it may be determined that some barriers identified through this transition plan are on facilities that have been built to the maximum extent feasible as discussed in section 4.3. Each project to remove barriers should be evaluated to determine if improvements to the facility are feasible in the engineering design phase.

At the end of each 5-year program a new program should be created to continue removing barriers and reevaluate progress. At the end of the 40-year plan for higher priority barrier removal, the remaining lower priority barriers will need to be removed. The City should continue using the series of 5-year programs to remove the remaining barriers.

6 Current Practices

This chapter documents key pieces of information which are critical for ongoing plan implementation. This information is likely to change over the lifetime of the plan such as the official responsible for plan oversight or progress report on barrier removal. This section is meant to act as a "living document" which should be updated to represent current practices or information.

This section is updated as of: October 2020

6.1 Official Responsible

- Official Responsible: Elizabeth Chamberlain, Deputy City Manager/ADA Coordinator
- Mailing Address: 15 North 3rd Avenue Walla Walla, WA 99362
- Phone Number: 509-527-4540
- Email: ada-titlevi@wallawalla.gov

6.2 Current Grievance Process

See **Appendix E** for draft grievance process. As recommendations are incorporated into the policy, this document will be revised.

6.3 Maximum Extent Feasible Database and Process

See **Appendix F** for documentation template. Once an official system is approved, the process will be documented in this appendix.

6.4 Accessible Pedestrian Signal (APS) Policy

See **Appendix D** for draft accessible pedestrian signal policy. Once an official system is approved, the policy will be documented in this appendix.

6.5 Accessibility of ADA Transition Plan Information

This document is available online at the City's ADA webpage. https://www.wallawallaada.com/

6.6 Barrier Removal Performance Monitoring

The plan is currently less than a year old, so it represents the most recent available data. As barriers are removed, the section will describe the progress made broken into annual increments.