City of Lakewood

RIGHT-OF-WAY ADA TRANSITION PLAN

Draft- March 18, 2026

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Title VI Notice

The City of Lakewood, in accordance with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d to 2000d-4 and Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-assisted programs of the Department of Transportation issued pursuant to such Act, hereby notifies all persons that it will affirmatively ensure that in any contract entered as a result of this document or as a project issued by the City of Lakewood, disadvantaged business enterprises as defined at 49 CFR Part 26 will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, national origin, or sex in consideration for an award.

American with Disabilities Act (ADA) and Section 504 Information

The City of Lakewood is committed to equal access for persons with disabilities in all its programs, services, and activities, in accordance with Title II of the ADA and Section 504 of the Rehabilitation Act.

This document is available in alternate formats upon request. Contact the City Engineer at wott@cityoflakewood.us or (253) 983-7725. Persons who are deaf or hard of hearing may call Washington State Relay at 711.

This ADA Transition Plan is intended to fulfill the City's obligation under 28 C.F.R. § 35.150(d) to identify and remove accessibility barriers to existing pedestrian facilities within the city’s public right-of-way. It is a living document, updated periodically to reflect improvements, emerging requirements, and community input. The City's goal is full ADA compliance and equal access for all users.

The city welcomes input from individuals with disabilities and is committed to expanding partnerships with the disability community, neighboring jurisdictions, and transit agencies to advance accessibility across the region.

Table of Contents

Executive Summary

The Americans with Disabilities Act (ADA) of 1990 is a federal civil rights law that prohibits discrimination against individuals with disabilities and ensures equal access to public services, programs, and activities.

Title II of the ADA applies to state and local governments and requires public entities with 50 employees or more to evaluate their facilities, policies, and practices to ensure accessibility for individuals with disabilities.

The City of Lakewood prepared this ADA Transition Plan to guide improvements to accessibility within the city's public rights-of-way (ROW). The plan focuses on existing pedestrian facilities owned or maintained by the city, including sidewalks, curb ramps, crosswalks, pedestrian push buttons, and related pedestrian infrastructure.

Accessibility improvements will occur over time through a combination of improvements:

- Capital improvement projects
- Roadway resurfacing programs
- Maintenance activities
- Traffic signal upgrades
- Private development frontage improvements

The ADA Transition Plan will function as a living document and will be periodically updated every 3-5 years.

Self-Evaluation and Existing Conditions

The city conducted a self-evaluation of existing pedestrian facilities within the public right-of-way to identify barriers that may affect accessibility. The initial inventory was completed in 2021and entered into the City's Geographic Information System (GIS), providing a dataset to guide prioritization of improvements. The inventory includes:

- 353,409 linear feet of sidewalks (approximately 66.9 miles)
- 1,255 curb ramps
- 296 pedestrian signal push buttons
- 1,999 driveways intersecting sidewalks

Common infrastructure issues identified during the self-evaluation include:

- Missing or outdated curb ramps
- Sidewalk segments with insufficient width or cross slopes exceeding standards

- Driveway slopes that affect the pedestrian access route
- Obstructions within existing pedestrian pathways
- Pedestrian signals lacking accessible push buttons

Although deficiencies remain, most facilities were found to be functional. Many accessibility improvements have already been completed through roadway reconstruction projects, corridor improvements, and signal upgrades since the initial inventory was conducted.

Progress

Since incorporation in 1996, the City of Lakewood has made significant strides in enhancing accessibility. Key achievements include:

- **Upgraded Pedestrian Infrastructure:** Substantial investment in street reconstruction over 30 years has upgraded many deficient ADA facilities and built compliant facilities in areas where none existed at incorporation.
- **GIS Inventory:** A full field inventory of curb ramps and pedestrian push buttons was completed in 2021 and entered into the City's GIS system, enabling data-driven prioritization of future improvements. The city is underway in 2026 on updating inventory as a result of capital projects.
- **Updated Standards:** In March 2026, Ordinance No 846 updated Lakewood Municipal Code (LMC) Title 12 and the Engineering Standards Manual which formally adopting current Public Right-of-Way Accessibility Guidelines (PROWAG) guidance for all new construction and alterations.
- **Coordinated Funding Strategy:** ADA improvements are funded through the City's biennial budget as part of the 6-Year Transportation Improvement Program (TIP) and Capital Improvement Plan (CIP).

Prioritization and Implementation

Because the number of facilities requiring improvement exceeds available annual funding, accessibility improvements will be implemented over time using a prioritization framework. Future plan updates should evaluate facilities based on condition, traffic volume, proximity to key destinations serving individuals with disabilities, and ADA complaints.

Improvements will be delivered through capital improvement projects, roadway resurfacing programs, dedicated ADA retrofit projects, routine maintenance activities, and frontage improvements associated with private development. Incorporating ADA upgrades into larger transportation projects provides the most cost-effective opportunity to remove accessibility barriers.

Planning-Level Cost Estimates

The City prepared a planning-level estimate to address facilities identified as poor condition in the 2021 ADA inventory. The estimated cost to address these deficiencies is approximately $34.1M, including:

- Sidewalk reconstruction – $16.7 million (49%)
- Driveway reconstruction – $12.9 million (38%)
- Accessible pedestrian signals – $2.6 million (7.6%)
- Curb ramp upgrades – $1.9 million (5.6%)

Funding and Monitoring Progress

Accessibility improvements will be funded through a combination of local revenues and external grants. Local sources also provide essential matching funds for state and federal grant programs.

Progress will be monitored through annual inventory rating updates, integration of ADA projects into the City's Six-Year Transportation Improvement Program (TIP and CIP, and documentation of completed improvements incorporated into GIS. Through continued investment and coordinated transportation planning, the City of Lakewood will continue working toward a pedestrian system that is accessible to all members of the community.

Chapter 1 - Introduction

1.1 Plan Requirements

The Americans with Disabilities Act (ADA), signed into law in 1990, is a civil rights statute prohibiting discrimination against people who have disabilities. ADA covers a wide range of disabilities, including physical disabilities that limit mobility, stamina, vision, hearing, and speech as well as cognitive disabilities, emotional illness and learning disorders.

ADA 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.

While accessibility requirements extend to all public facilities, the scope of this plan is focused on pedestrian accessibility within the city's public right-of-way. The City of Lakewood must comply with the broader requirements of Title II of the ADA when developing and updating the ADA Transition Plan. Specifically:

- Must operate services, programs, or activities so that, when viewed in their entirety, they are accessible to and usable by individuals with disabilities (28 CFR § 35.150).
- May not refuse to allow a person with a disability to participate in services, programs, or activities simply because the person has a disability (28 CFR § 35.130(a)).
- Must make reasonable modifications in policies, practices, and procedures to ensure equal access to individuals with disabilities, unless modifications would fundamentally alter the nature of the service, program, or activity (28 CFR § 35.130(b)(7)).
- Must designate at least one responsible employee (the ADA Coordinator) to coordinate ADA compliance, and must provide that person's name, office address, and telephone number to all interested individuals (28 CFR § 35.107(a)).
    - City of Lakewood ADA Coordinator: Nicole Camus, Human Resources Manager | 6000 Main Street SW, Lakewood, WA 98499 | (253) 983-7709 | ncamus@cityoflakewood.us
- Must adopt and publish grievance procedures providing for prompt and equitable resolution of complaints (28 CFR § 35.107(b)). Available on the city's website at

https://cityoflakewood.us/wp-content/uploads/2023/10/Lakewood-ADA-Grievance-Form-Fillable.pdf

- Include a schedule of improvements to upgrade accessibility in each year following the Transition Plan.
- Considered as part of planning of projects and funding decisions with periodic updates to ensure compliance and validity. The Transition Plan should be viewed as a "living document" and updated regularly to reflect changes in real world conditions and to address any possible new areas of noncompliance.

Additionally, Transition Plans best practices are outlined in the National Cooperative Highway Research Program (NCHRP) Project Number 20-7 (232), "ADA Transition Plans: A Guide to Best Management Practices", dated May 2009. This Plan is intended to address street sidewalk ramps and traffic signal push buttons.

1.2 ADA and its Relationship to Other Laws

Title II of the ADA is companion legislation to two previous federal statutes and regulations: the Architectural Barriers Act of 1968 and Section 504 of the Rehabilitation Act of 1973.

- **Architectural Barriers Act of 1968:** A federal law requiring facilities designed, built, altered, or leased with federal funds to be accessible. This Act marks one of the first efforts to ensure access to the built environment.
- **Section 504 of the Rehabilitation Act of 1973:** A federal law protecting qualified individuals from discrimination based on disability. The nondiscrimination requirements apply to employers and organizations receiving financial assistance from any federal department or agency. Title II of ADA extended this coverage to all state and local government entities, regardless of whether they receive federal funding.

1.3 Plan Structure

Below is a brief structural overview of this ADA Transition Plan for existing pedestrian facilities within the city's public ROW. The plan is organized into several chapters and appendices, addressing the City's ADA obligations under Title II of the ADA, its current infrastructure inventory, correction and prioritization program, and budget and monitoring framework.

Ch. 1 – Introduction	Establishes the legal framework under Title II of the ADA. Describes the formal Transition Plan process, WSDOT LAG evaluation rubrics, and the relationship of this Plan to the Architectural Barriers Act and Section 504 of the Rehabilitation Act.
Ch. 2 – Stakeholder Engagement	Identifies strategy for communicating with disability advocates, Pierce County agencies, transit providers, schools, and the public.
Ch. 3 – Self-Evaluation	Describes available field inventory of all curb ramps, pedestrian push buttons, sidewalks, and driveways in the City ROW, entered into the GIS database.
Ch. 4 – Design Standards & Engineering Practices	Covers the adoption of PROWAG as the City's technical standard, the role of the WSDOT Design Manual and the March 2026 updates to the Engineering Standards Manual and City Standard Plans. Addresses new vs. alteration project requirements.
Ch. 5 – Methods to Improve Accessibility	Details improvement delivery methods. Addresses USDOJ-recognized limitations, curb ramp and push button upgrade requirements, obstruction removal, and seven measurable milestones through 2044.
Ch. 6 – Prioritization	Defines a new GIS color-coded rating system (Red/Yellow/Light Green/Green). Establishes a weighted scoring matrix.
Ch. 7 – Planning Level Estimates & Funding Opportunities	Ties ADA projects to the biennial budget 6-Yr CIP and 6-Year TIP. Identifies Funding Opportunities section identifying six grant programs: HSIP, CMAQ, TAP, Safe Routes to School, Bike and Ped., TIB, and Transportation Benefit District bonding.
Ch. 8 – Recommendations & Monitoring Progress	Provides recommendations for future plan updates, implementation and monitoring through key performance indicators.
App. A – WSDOT LAG	Outlines WSDOT Local Agency Guideline requirements, chapter 29, the seven rubric categories.
App. B – Lakewood ADA Grievance Form	City of Lakewood ADA complaint and grievance form, administered by the Human Resources Manager (ADA Coordinator).
App. C – Notice of ADA Transition Plan	Notice of ADA Transition Plan development including the public comment period, milestone schedule, and project contact information.
App. D – Planning Level Cost Estimates	Provides high-level estimates of facility needs using the 2021 inventory.

App. E – Comment Responses	Future plan insert (placeholder) documenting comments received during formal comment period and response.
App. F – Glossary of Terms	Defines key terms.

Chapter 2 – Stakeholder Engagement

2.1 Purpose

Stakeholder engagement is critical to success of this Americans with Disabilities Act (ADA) transition plan. ADA implementation regulations require public entities to provide an opportunity to interested persons including individuals with disabilities or organizations representing individuals with disabilities, transit organizations and public 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)).

The city developed a strategy to communicate with stakeholders to achieve their understanding and support for the project. Created at the beginning of the project, it is updated as stakeholder communication needs change.

Persons with disabilities, organizations representing persons with disabilities, transit agencies, and members of the public are invited to review and provide input to refine the draft ADA Transition Plan. Their participation is encouraged to help identify accessibility barriers and improve the effectiveness of the plan.

2.2 Project Website & Medias

The draft plan and supporting documents are housed on the City's webpage at the following link:

https://cityoflakewood.us/planning-and-public-works/ada-transition-plan-development-for-city-transportation-facilities/

In addition to the project webpage, the city uses several communication channels to inform the public about the plan and opportunities to provide feedback, including:

- Announcements in the City Manager's weekly bulletin
- Updates through the City's social media platforms
- Notices posted on the City's website
- City Planning Commission and Council meetings

These communication methods help ensure that information about the ADA Transition Plan reaches a broad audience within the community.

2.3 Comment Period

A stakeholder contact list was developed to facilitate outreach during preparation of the ADA Transition Plan. Notifications regarding the availability of the draft plan and opportunities to provide comments are distributed to stakeholders via email and to the broader public through the City's standard public information methods, including web updates and social media.

Written public input on this plan may be submitted by sending comments to Lakewood's City Engineer Weston Ott at wott@cityoflakewood.us or at 6000 Main Street, Lakewood WA 98499.

2.3.1 Planning Commission

The draft ADA Transition Plan will be presented to the Lakewood Planning Commission who will also hold a public hearing. During this hearing, members of the public and stakeholder organizations may provide comments on the draft plan.

2.3.2 City Council

Following Planning Commission review, the ADA Transition Plan will be presented to the City Council for a study session and consideration of adoption. Public input may also be provided during regular business meetings.

At the time of approval, Appendix F will incorporate documents posted and received as part of this plan update.

Chapter 3 - Self-Evaluation

3.1 Summary

The City's self-evaluation addresses two components: a policy and practices review, and a physical inventory of existing facilities. Together they identify accessibility barriers and establish correction priorities.

3.2 Federal and State Design Standards

Sound design practices and guidelines are essential to ensure that newly constructed or upgraded pedestrian facilities meet Americans with Disabilities Act (ADA) Title II and Section 504 requirements, reducing barriers in the City's rights-of-way (ROW) over time. This section summarizes the applicable federal and state standards.

3.2.1 Federal

The U.S. Access Board's Guidelines for Accessible Public Rights-of-Way (PROWAG) provide the primary technical standard for accessible pedestrian facilities in the ROW. PROWAG was formally adopted on August 8, 2023 and became effective on January 17, 2025 for the USDOT regarding transit stops.

3.2.2 State

The Washington State Department of Transportation (WSDOT) Design Manual establishes design requirements for local, state, and federally funded projects. RCW 35.78 requires all agencies to adopt appropriate standards for all city projects, including pedestrian and bicycle facilities. Chapter 15 of the Design Manual addresses ADA compliance by project type:

- New construction: all pedestrian facilities must fully meet PROWAG requirements as built; the Maximum Extent Feasible (MEF) exception does not apply.
- Alterations: any project that affects pedestrian access, circulation, or usability, including resurfacing, reconstruction, and rehabilitation, must bring altered elements into compliance to the maximum extent feasible, which may require scope expansion or additional right-of-way.

Further, WSDOTs Local Agency Guidelines (LAG) manual provides guidance in the development of ADA transition plans. This is further outlined in Appendix A.

3.3 City Policy and Standard Review

The policy review examines City plans, regulatory documents, and design standards for content relating to existing ADA programs, policies, and practices affecting pedestrian facilities in the public right-of-way. The City of Lakewood primarily addresses pedestrian facilities in several policy and regulatory documents:

- Lakewood Comprehensive Plan (June 2025)
- Downtown Subarea Plan (January 2025)
- Lakewood Station District Subarea Plan (September 2024)
- Tillicum-Woodbrook Subarea Plan (September 2024)
- Lakewood Commute Trip Reduction 4-Year Plan 2025-2029 (June 2025)
- Lakewood Non-Motorized Transportation Plan (March 2023)
- Lakewood Engineering Design Manual (March 2026)
- Lakewood Municipal Code (LMC) Titles 12, 15, 18A, 18B and 18C

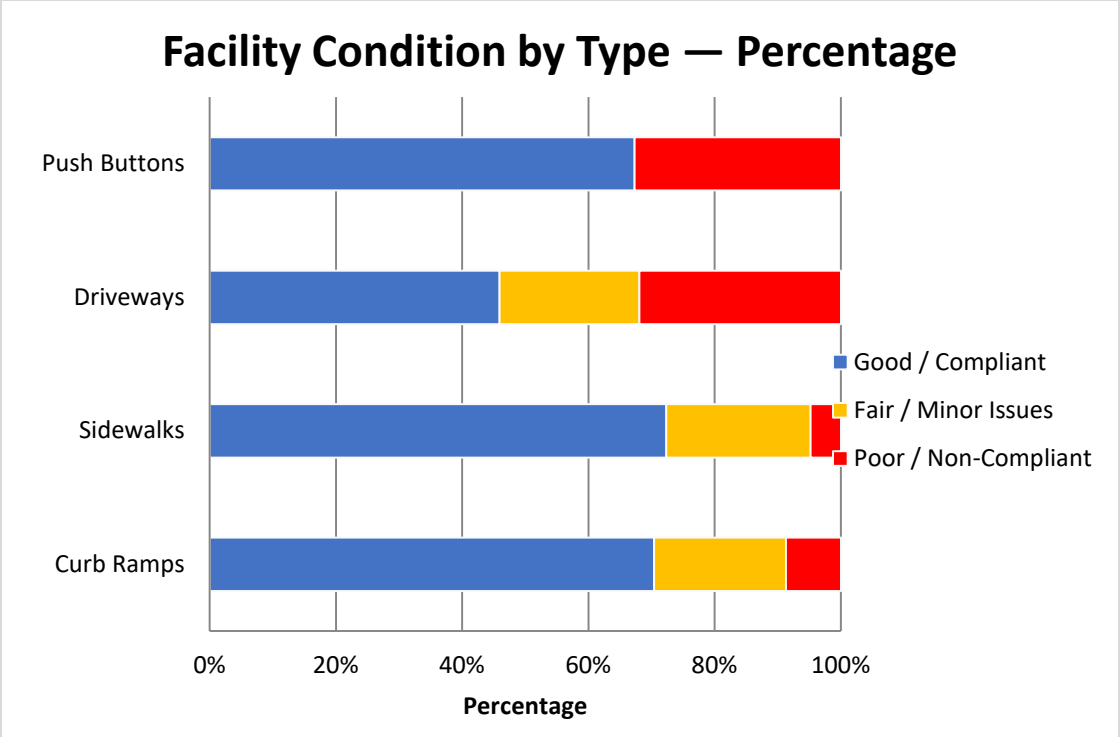
The policies and standards were reviewed for content that relates to existing ADA programs, policies and practices.

3.4 Existing Facilities

The physical inventory addresses barriers associated with existing pedestrian facilities (curb ramps, sidewalks, crosswalks, and pedestrian push buttons) as required by ADA Title II, 28 C.F.R. § 35.150(d)(3). Each facility was field-inventoried and cataloged in the City's GIS database, with barriers ranked by condition (poor, fair, or good). The initial inventory was completed in 2021.

In 2026, a follow-up update is underway to reflect capital projects completed between 2022 and 2025. As shown in the figures below, existing inventory includes:

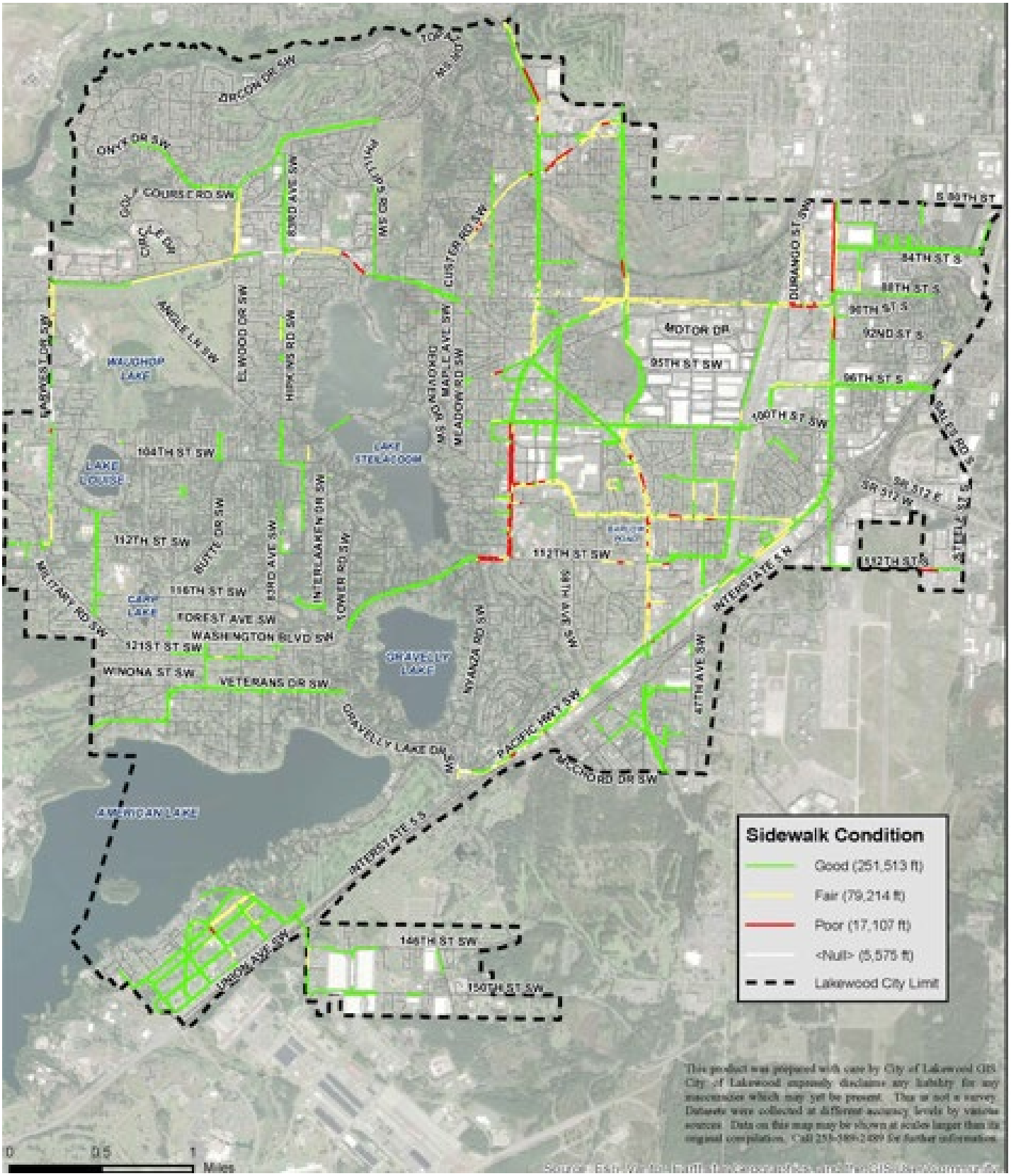
- 353,409 linear feet of sidewalks (66.9 miles)
- 1,255 curb ramps
- 296 pedestrian signal push buttons
- 1,999 driveways



3.4.1 Sidewalks

As part of the ADA Right-of-Way Self-Evaluation, the City inventoried sidewalk segments throughout the public right-of-way to evaluate their condition and functionality as part of the pedestrian access route (PAR). The assessment reviewed sidewalk surfaces, continuity, and general usability for individuals with disabilities.

Overall, the inventory indicates that most sidewalks are in good condition, and with the inclusion of recent capital improvement projects, it is anticipated that the ranking will be higher.


Sidewalk Condition
Good (251,513 ft)
Fair (79,214 ft)
Poor (17,107 ft)
<Null> (5,575 ft)
Lakewood City Limit
0
0.5
1
Miles
MOTOR DR
95TH ST SW
100TH ST SW
104TH ST SW
112TH ST SW
116TH ST SW
121ST ST SW
FOREST AVE SW
WASHINGTON BLVD SW
WINONA ST SW
VETERANS DR SW
GRAVELLY LAKE DR SW
PACIFIC HWY SW
INTERSTATE 5
146TH ST SW
150TH ST SW
84TH ST S
88TH ST S
92ND ST S
96TH ST S
SR 512 W
SR 512 E
112TH ST S
INTERSTATE 5 N
47TH AVE SW
MILITARY RD SW
BUTTE DR SW
83RD AVE SW
INTERLAKEN DR SW
LOWER RD SW
HIPKINS RD SW
ELWOOD DR SW
ANGLE LN SW
BASKET DR SW
CURTIS RD SW
MEADOW RD SW
MAPLE AVE SW
PHILLIPS RD SW
83RD AVE SW
GOLF COURSE RD SW
CIRCLE DR
OHTT DR SW
ARCOLA DR SW
TOP ST
DURANGO ST SW
LAKE LOUISE
LAKE STERLACOOM
WADDOP LAKE
CARP LAKE
GRAVELLY LAKE
AMERICAN LAKE
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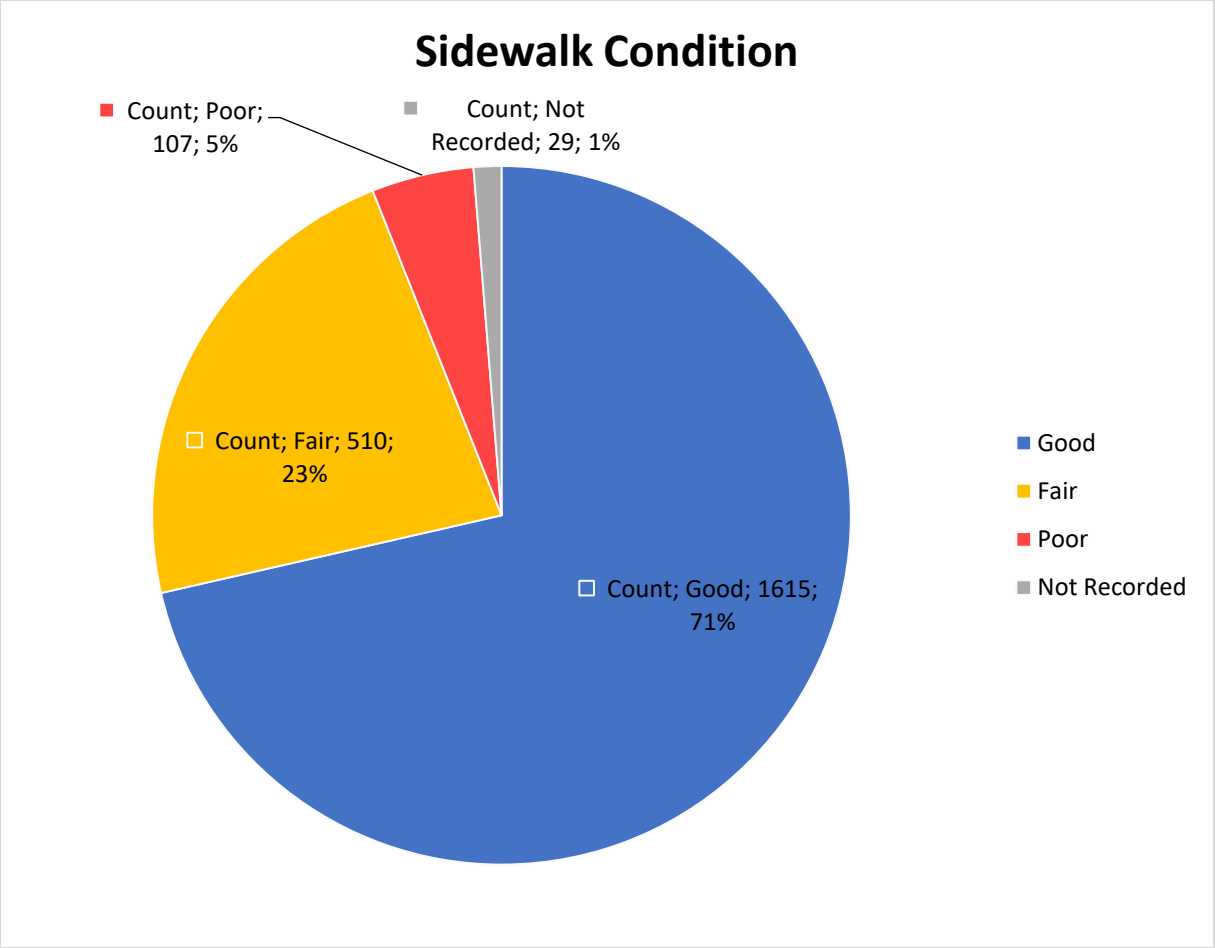


3.4.2 Accessible Pedestrian Signals (APS)

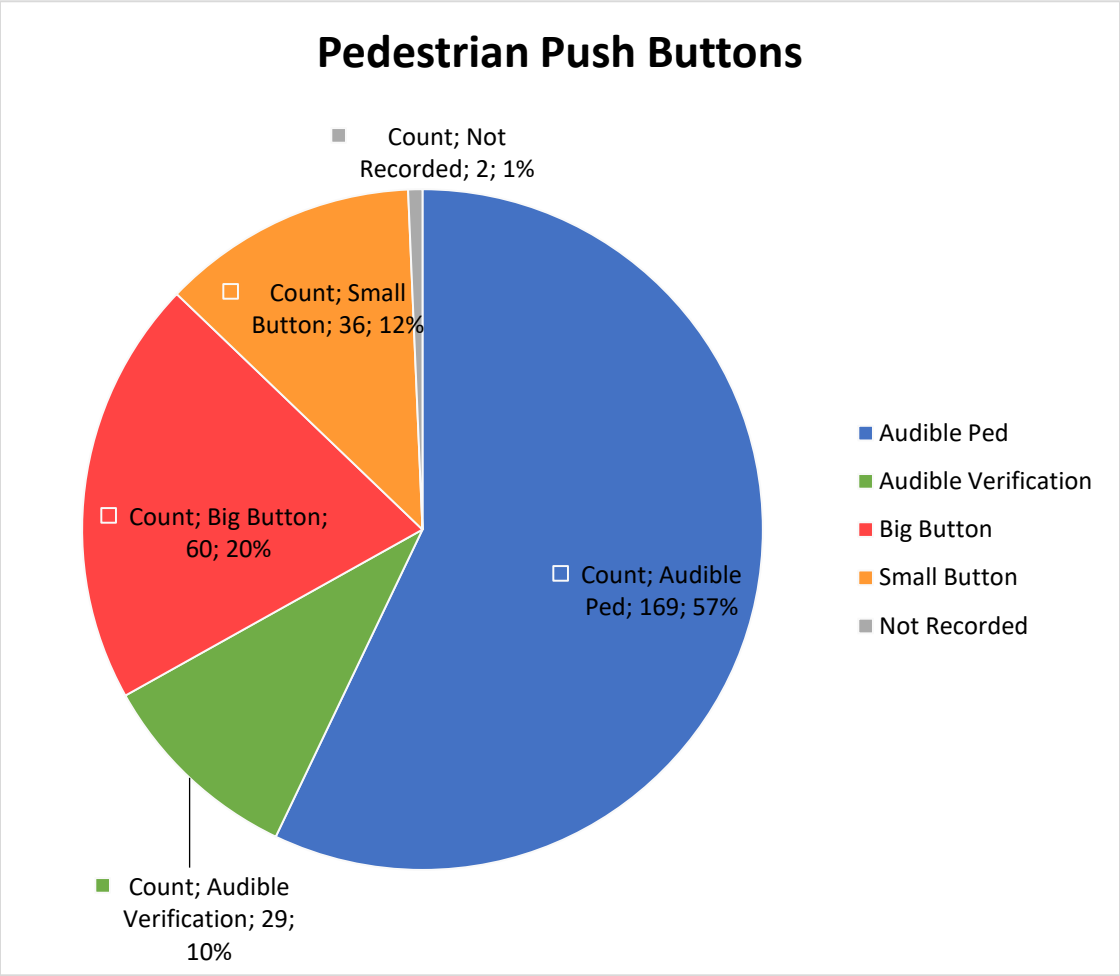
Accessible Pedestrian Signals (APS) were evaluated as part of the City's ROW 2021 Self-Evaluation. APS devices provide audible and vibrotactile information indicating the *WALK* phase of a signalized intersection and are critical for individuals who are blind or have low vision.

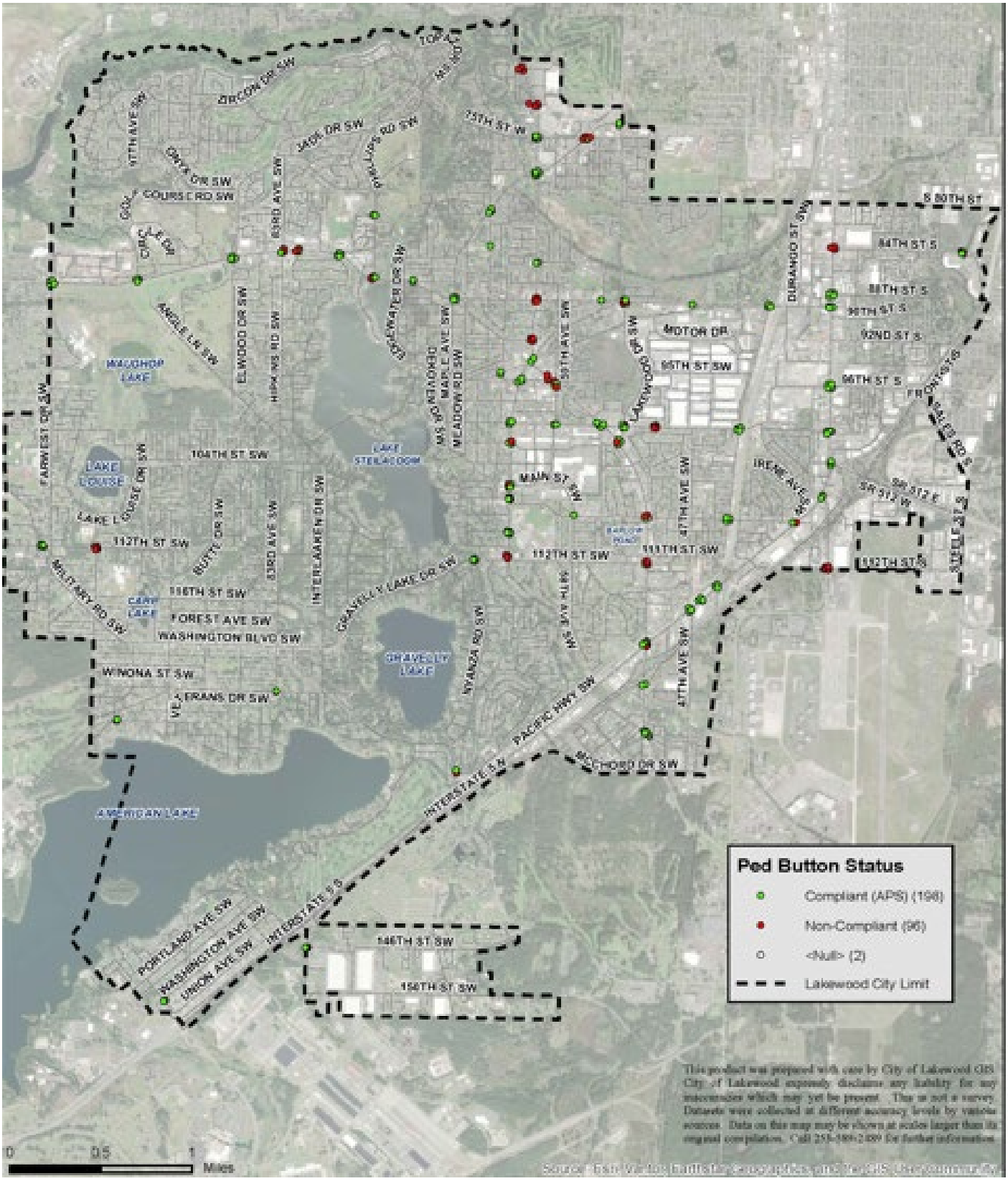
The inventory reviewed pedestrian push button installations at signalized intersections throughout the city to determine whether the devices meet current accessibility standards, including PROWAG requirements related to button placement, reach range, audible functionality, and other operational features. Like sidewalks, with capital investments since 2021, the condition ratings of APS are anticipated to be improved.

As shown below, APS facilities are distributed across the City's signalized intersections. Most compliant APS installations are located along the City's principal corridors and near

major activity centers. Non-compliant locations are generally associated with older signal infrastructure installed prior to current accessibility requirements.

Clusters of non-compliant pedestrian push buttons occur primarily along several arterial corridors and at intersections where signal equipment has not yet been upgraded to modern accessibility standards. This has been addressed on Washington Blvd. and portions of Steilacoom Blvd. as part of recent capital improvements.




Ped Button Status
Compliant (APS) (198)
Non-Compliant (96)
<Null> (2)
Lakewood City Limit
0
0.5
1
Miles
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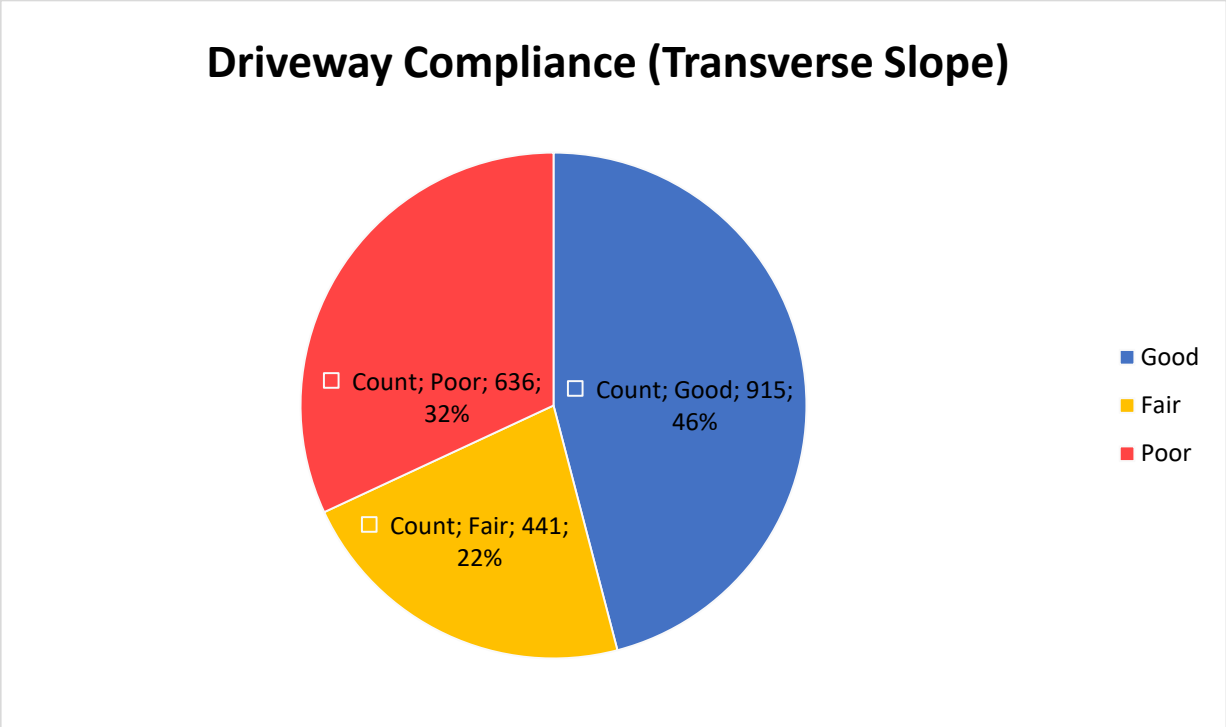
Source: Esri, Vantor, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS User Community
TOPAZ CT SW
ORCAS DR SW
JACK DR SW
PHILLIPS RD SW
75TH ST W
S 80TH ST
84TH ST S
88TH ST S
90TH ST S
92ND ST S
96TH ST S
DURANGO ST SW
MOTOR DR
95TH ST SW
LAKEWOOD DR SW
57TH AVE SW
FRONTAGE RD S
ALFB RD S
IRENE AVE SW
SR 512 W
SR 512 E
47TH AVE SW
111TH ST SW
112TH ST SW
112TH ST S
MAIN ST SW
LAKE STEILACOOM
MEADOW RD SW
MAPLE AVE SW
GREENWATER DR SW
ELWOOD DR SW
HIPKINS RD SW
83RD AVE SW
INTERLAAKEN DR SW
104TH ST SW
LAKE LOUISE
LAKE LOUISE DR SW
FARWEST DR SW
BUTTE DR SW
112TH ST SW
MILITARY RD SW
116TH ST SW
CAMP LAKE
FOREST AVE SW
WASHINGTON BLVD SW
GRAVELLY LAKE DR SW
GRAVELLY LAKE
WYANZA RD SW
58TH AVE SW
WINONA ST SW
VETERANS DR SW
PACIFIC HWY SW
BRIDGEPORT WAY SW
INTERSTATE 5 N
INTERSTATE 5 S
AMERICAN LAKE
PORTLAND AVE SW
WADDINGTON AVE SW
UNION AVE SW
146TH ST SW
150TH ST SW

3.4.3 Driveways

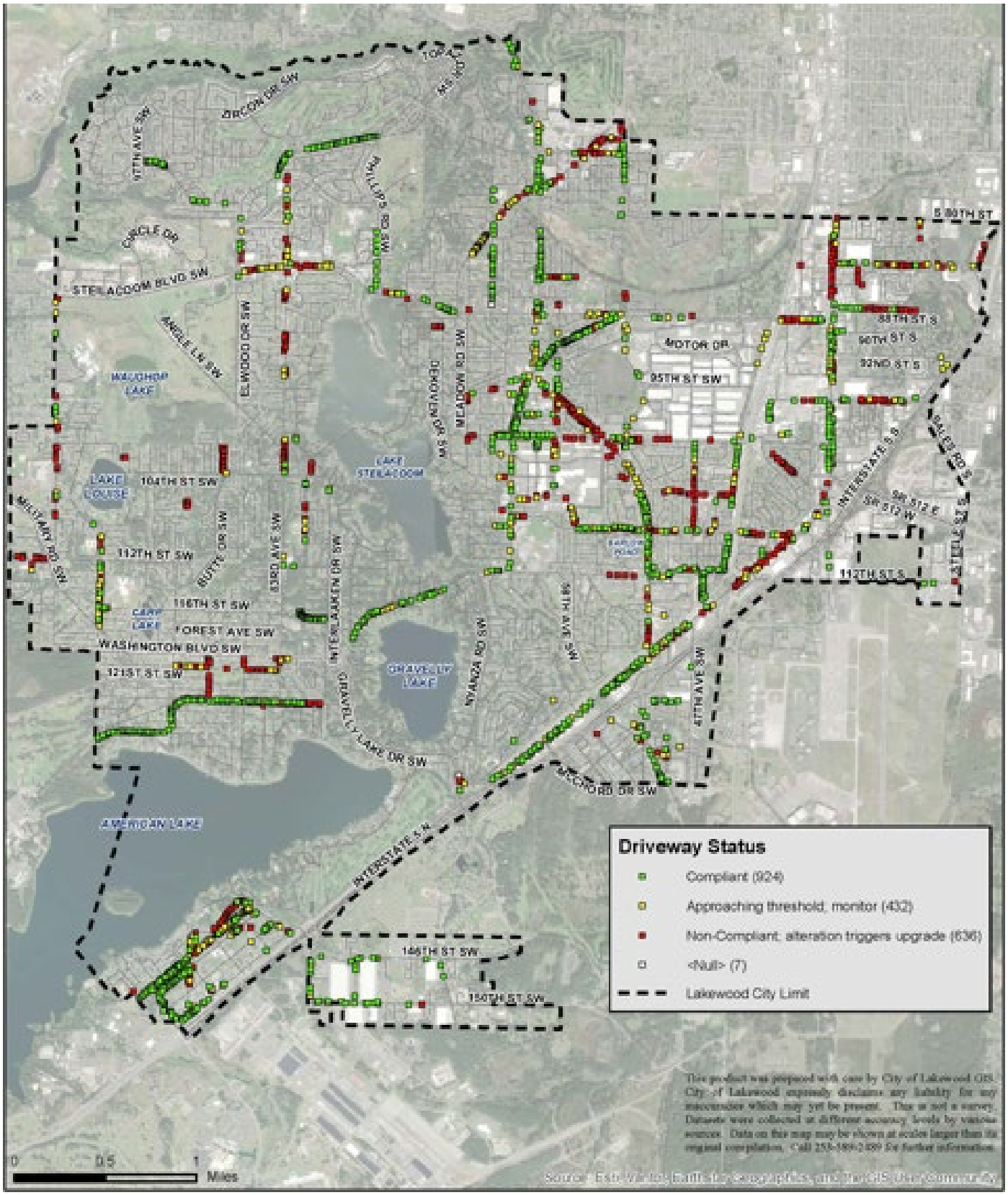
Driveways intersecting sidewalks within the public right-of-way were also evaluated as part of the Self-Evaluation. Driveways can affect the accessibility of the pedestrian access route where cross slopes exceed allowable limits or where driveway aprons create vertical or horizontal surface discontinuities.

In many cases, older driveway designs prioritize vehicle access over pedestrian accessibility, resulting in slopes that exceed this threshold. These conditions can create barriers for individuals using wheelchairs, walkers, or other mobility devices.



The inventory identified a range of driveway conditions that may affect pedestrian accessibility. Many driveways remain functional but do not fully meet current ADA or PROWAG standards.

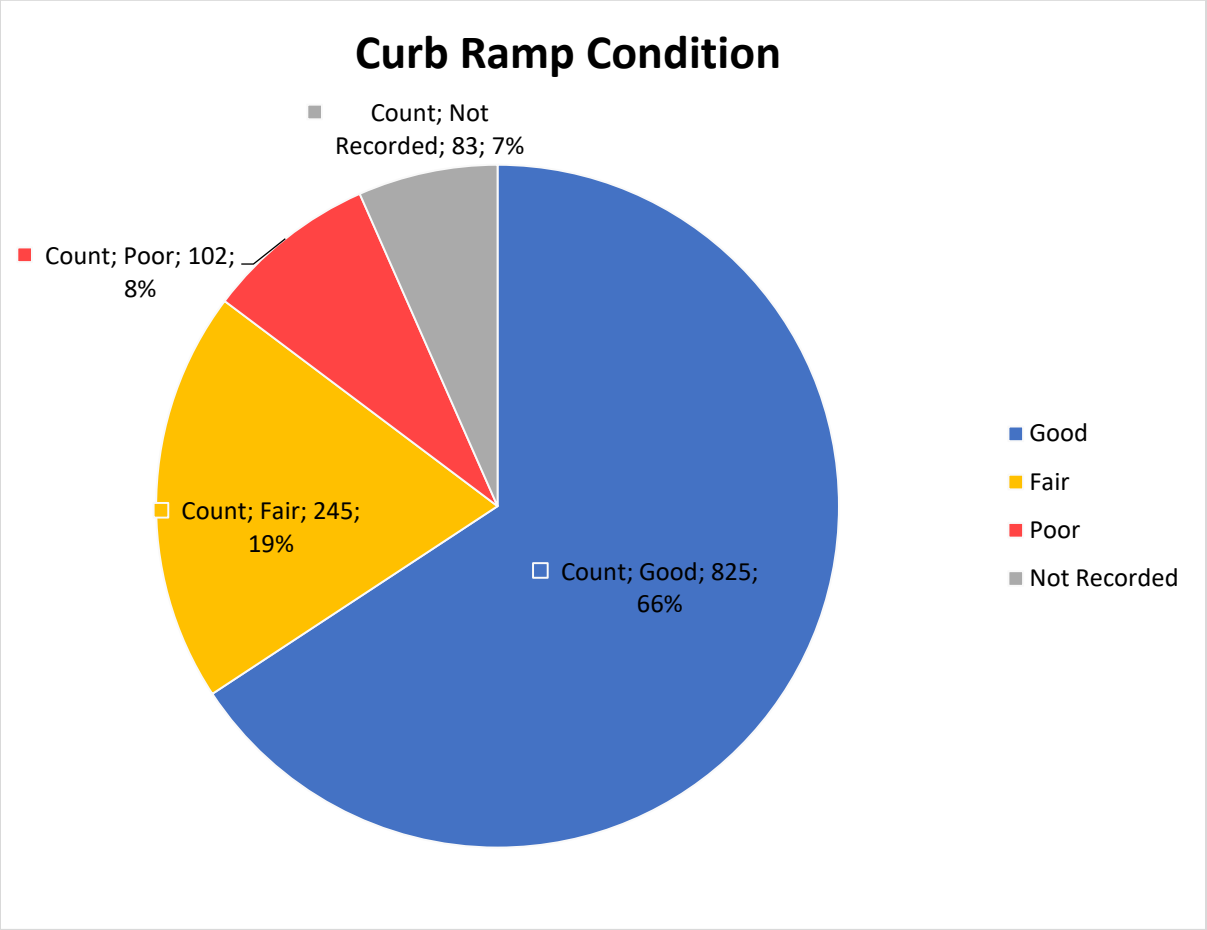
Condition	Description
Good	Driveway slopes and surface conditions meet accessibility requirements or do not significantly affect the pedestrian access route.
Fair	Driveway remains usable but may exceed preferred slope limits or create minor accessibility challenges.
Poor	Driveway slopes significantly exceed ADA/PROWAG limits or create barriers to accessible travel along the pedestrian route.


Driveway Status
Compliant (924)
Approaching threshold, monitor (432)
Non-Compliant, alteration triggers upgrade (636)
<Null> (7)
Lakewood City Limit
STEILACOOM BLVD SW
MOTOR DR
95TH ST SW
112TH ST SW
116TH ST SW
121ST ST SW
WASHINGTON BLVD SW
FOREST AVE SW
146TH ST SW
150TH ST SW
112TH ST S
Miles

3.4.4 Curb Ramps

The City completed an inventory of curb ramps throughout the public right-of-way to assess their condition and compliance with ADA accessibility requirements. The inventory evaluated curb ramps based on functionality, physical condition, and general conformance with current accessibility standards.

The results indicate that most curb ramps in the City's system are in good condition, about a third require improvement to meet current accessibility standards or to restore full functionality.




ORCAS DR SW
PHILLIPS RD SW
75TH ST W
CIRCLE DR
AMELIA LN SW
ELWOOD DR SW
MS DOMENICO DR SW
MOTOR DR
95TH ST SW
S 96TH ST
88TH ST S
90TH ST S
92ND ST S
INTERSTATE 5 S
SALE ST S
SR 512 E
SR 512 W
112TH ST SW
BUTTE DR SW
83RD AVE SW
INTERLAAKEN DR SW
LAKE STERLACOOM
LAKE LOUISE
112TH ST SW
116TH ST SW
FOREST AVE SW
WINONA ST SW
GRAVELLY LAKE
WANDA RD SW
59TH AVE SW
47TH AVE SW
BRIDGEPORT WAY SW
AMERICAN LAKE
INTERSTATE 5 N
150TH ST SW
Curb Ramp Condition
Good (825)
Fair (245)
Poor (102)
<Null> (83)
Lakewood City Limit
0
0.5
1
Miles

3.4.6 Inventory Summary by Facility Type

The City's pedestrian facilities provide a systemwide overview of the condition and accessibility of facilities within the public right-of-way. The inventory results provide an important foundation for identifying accessibility barriers and prioritizing improvements.

The table below summarizes the condition of inventoried facilities.

Facility Type	Good	Fair	Poor
Curb Ramps	825	245	102
Sidewalk Segments	1,615	510	107
Driveways	915	441	636
Pedestrian Push Buttons	198	—	96

Facilities categorized as good generally meet current accessibility requirements or function adequately as part of the pedestrian access route. Facilities categorized as fair remain usable but may include minor accessibility issues or may require repair to prevent further deterioration. Facilities categorized as poor contain significant accessibility deficiencies or conditions that limit usability.

These results provide the baseline for the City's accessibility improvement program in the ROW. The ongoing 2026 inventory update will incorporate improvements completed through recent capital projects and may reduce the number of facilities identified as deficient.

3.4.7 Findings

Since incorporation in 1996, the City's capital program has upgraded or replaced many deficient ADA facilities and built compliant infrastructure where none previously existed. Inventory categorization and GIS data will require ongoing refinement consistent with the methodologies in Chapter 6 and Appendices D and E.

The City's planning and regulatory documents support accessible pedestrian infrastructure and contain no policies that conflict with ADA requirements. Key findings:

- ADA compliance is implicitly supported across multiple plans but lacks explicit cross-references to the Transition Plan and its milestone schedule — a gap future updates should address.
- The Non-Motorized Transportation Plan and ADA Transition Plan should be formally coordinated and updated on aligned schedules.

- CTR employer sites, transit station areas, and downtown/subarea pedestrian priority zones are useful proxies for ADA pedestrian demand and should inform priority scoring.
- The March 2026 updates to LMC Title 12 and the Engineering Design Manual are the City's most significant recent ADA policy and regulatory update, formally embedding WSDOT Design Manual and PROWAG requirements into all project delivery.

Capital Investments Supporting Pedestrian Accessibility

The City of Lakewood continues to invest in roadway preservation and corridor improvements through its adopted Six-Year Transportation Improvement Program (TIP) and Capital Improvement Plan (CIP). Several projects within the current capital program include roadway reconstruction, resurfacing, and intersection upgrades that incorporate pedestrian improvements consistent with ADA and PROWAG standards. These projects provide opportunities to upgrade curb ramps, sidewalks, and pedestrian crossings within the project limits as part of larger transportation improvements.

In addition, the city is updating its pedestrian facility inventory and ADA self-evaluation in 2026. This updated assessment will incorporate improvements completed since the initial evaluation and refine facility condition scores used in the prioritization methodology. As accessibility improvements are constructed through capital projects, resurfacing programs, and dedicated ADA improvements, the number of non-compliant facilities is expected to decline. The updated inventory will therefore reduce the number of facilities identified with deficient condition scores and help focus future improvements on remaining accessibility gaps.

Summarized below are some capital improvements in construction or completed that will be incorporated into the 2026 self-evaluation update.

Project Corridor / Location	Project Type	Pedestrian Improvements Included
Kendrick Street (111th St SW – 108th St SW)	Roadway improvements	Sidewalk improvements, curb ramp upgrades, pedestrian access route improvements
112th Street SW (Gravelly Lake Dr – Bridgeport Way)	Roadway improvements	Sidewalk reconstruction, ADA curb ramps, pedestrian crossings
Nyanza Road improvements	Roadway improvements	Sidewalk connectivity improvements, curb ramp upgrades

Project Corridor / Location	Project Type	Pedestrian Improvements Included
Mt. Tacoma Drive (Interlaaken Dr – Whitman Ave)	Roadway improvements	Sidewalk and curb ramp upgrades along corridor
South Tacoma Way & 92nd Street intersection	Rodway and signal improvements	Accessible pedestrian signal (APS) upgrades and push button improvements
Citywide pavement preservation programs	Pavement preservation	Curb ramp upgrades at altered intersections where resurfacing triggers ADA requirements

Further, this plan will need to be updated periodically as improvements are completed, inventory and scoring refined, standards evolve, and community input identifies emerging needs.

Chapter 4 – Design Standards and Engineering Practices

4.1 Purpose

This chapter describes the design standards, engineering practices, and accessibility requirements used by the City of Lakewood when constructing, modifying, or maintaining pedestrian facilities within the public right-of-way (ROW). These standards guide the planning, design, and construction of accessible pedestrian infrastructure and ensure that future improvements support compliance with the Americans with Disabilities Act (ADA).

The city applies a hierarchy of design standards consisting with federal accessibility requirements, state transportation design standards, and locally adopted engineering standards. Together, these documents establish a consistent framework for delivering transportation improvements that remove accessibility barriers and improve the overall usability of the pedestrian network.

Accessibility standards and engineering practices continue to evolve as federal regulations, state design guidance, and best practices are updated. The city should periodically update its local engineering standards to maintain consistency with these requirements. The most recent updates occurred in March 2026 with revisions to Lakewood Municipal Code Title 12 and the Engineering Design Manual, which formally incorporated current accessibility requirements consistent with the Public Rights-of-Way Accessibility Guidelines (PROWAG) and the Washington State Department of Transportation (WSDOT) Design Manual.

4.2 Federal Accessibility Standards

ADA prohibits discrimination against individuals with disabilities and requires state and local governments to ensure that their programs, services, and activities are accessible. Title II of the ADA applies to public entities and requires that pedestrian infrastructure within the public right-of-way be designed and constructed in a manner that provides equal access for individuals with disabilities.

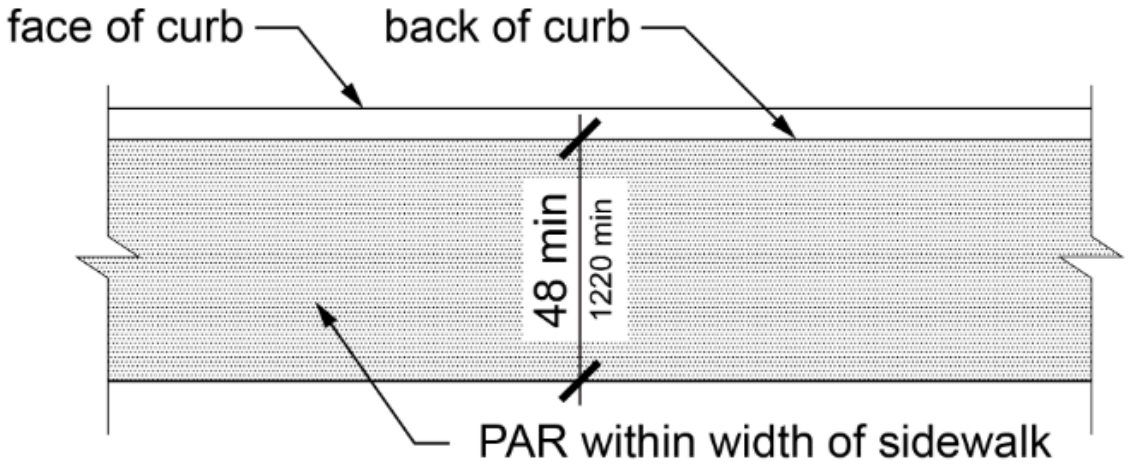
The primary technical standard governing accessibility within public rights-of-way is the PROWAG issued by the U.S. Access Board. PROWAG establishes detailed technical requirements for pedestrian facilities located within streets, sidewalks, and other public transportation corridors.

PROWAG provides design criteria for key elements of the pedestrian environment, including:

- Pedestrian Access Routes (PAR)
- Sidewalk widths and cross slopes
- Curb ramps and blended transitions
- Detectable warning surfaces
- Pedestrian street crossings
- Accessible pedestrian signals (APS)
- Pedestrian push button placement

Under PROWAG, pedestrian access routes generally provide a minimum clear width of 4 feet, a maximum cross slope of 2%, and accessible connections between pedestrian facilities and street crossings.

PROWAG R302 establishes the allowable running slope for pedestrian access routes. When sidewalks are located within a street right-of-way and the roadway grade exceeds 5%, the sidewalk may follow the street grade. If the grade exceeds 8.33%, the sidewalk is treated as a ramp and must meet ramp requirements, including handrails and landings, to the maximum extent feasible (MEF). The City's Engineering Design Manual (March 2026) incorporates these standards. Project engineers evaluate running slopes during design on steep segments and document any MEF determinations when full ramp compliance is not structurally practicable.



The city recognizes strict compliance with cross-slope requirements at all intersections may not be feasible in areas with steep roadway grades or other physical conditions. For design objectives for pedestrian access routes and marked crosswalks, site conditions within the existing roadway network may limit the ability to achieve this standard without creating other safety or engineering conflicts. In particular, grades, intersection geometry, drainage requirements and the need to maintain consistency with American Association of

State Highway and Transportation Officials (AASHTO) roadway design standards may make full compliance impracticable in certain locations. These conditions are common in many jurisdictions and may occur where attempting to achieve a 2% cross slope would require substantial roadway reconstruction or create conflicts with established grades.

Where full compliance cannot reasonably be achieved, the City shall apply a MEF evaluation consistent with accessibility guidance used by WSDOT and other transportation agencies. Under this approach:

- Designers shall first evaluate whether the intersection and crosswalk can be constructed to meet the cross slope standard while maintaining safe roadway design and drainage.
- If compliance cannot be achieved due to physical or engineering constraints, the design team shall document the specific conditions preventing full compliance.
- The project shall incorporate accessibility improvements to the MEF, including curb ramps, landing areas, and crosswalk geometry that provide the best achievable accessibility within the project limits.
- MEF determinations shall be documented in the project file as part of the design record.

This approach recognizes that existing topography and roadway conditions may limit the ability to achieve fully compliant cross slopes in every location, while ensuring that accessibility improvements are implemented wherever feasible.

For facilities that have not been altered, ADA Title II requires that public agencies ensure program access, meaning that services, programs, and activities must be accessible when viewed in their entirety. The ADA Transition Plan for public rights-of-way (ROW) serves as the City's framework for identifying barriers within existing facilities and establishing a program for removing those barriers over time.

4.3 State Design Standards

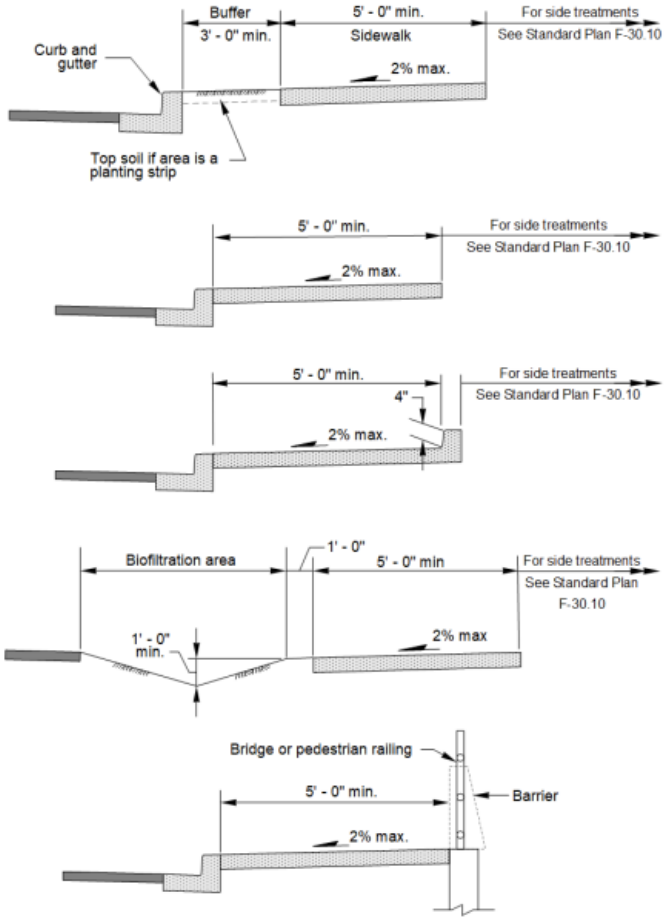
WSDOT establishes statewide design guidance for transportation facilities through the WSDOT Design Manual and the Local Agency Guidelines (LAG) Manual.

The WSDOT Design Manual provides engineering guidance for roadway and pedestrian facility design and is widely used by local agencies for transportation projects that utilize federal or state transportation funding. The manual includes design criteria for roadway geometry, intersections, sidewalks, curb ramps, and pedestrian crossings.

WSDOT Design Manual specifically addresses ADA compliance for transportation projects and describes how accessibility requirements apply to different project types.

Key guidance provided in the WSDOT Design Manual includes:

- Design requirements for pedestrian access routes
- Technical standards for curb ramp construction
- Accessible pedestrian signal placement and functionality
- Sidewalk width and cross slope requirements
- Intersection accessibility design



The WSDOT LAG Manual provides guidance to local agencies regarding ADA compliance and the development of ADA Transition Plans. LAG encourages agencies to conduct facility inventories, develop prioritization methodologies, and integrate accessibility improvements into transportation capital programs.

Projects receiving federal transportation funding must comply with both the WSDOT Design Manual and the LAG Manual.

By incorporating these standards into local engineering practices, the city ensures that transportation improvements remain consistent with state and federal accessibility requirements.

4.4 Local Engineering Standards

The City of Lakewood maintains locally adopted engineering standards that govern the design and construction of transportation infrastructure within the public right-of-way.

These standards establish the minimum technical requirements for roadway and pedestrian facility construction.

Local engineering standards are primarily defined through the following documents:

- Lakewood Municipal Code Title 12 (Streets and Sidewalks)
- Lakewood Engineering Design Manual (ESM)
- Development engineering and zoning requirements for frontage improvements

These documents define the design criteria for sidewalks, curb ramps, intersections, drainage facilities, utilities, and other public infrastructure.

In March 2026, the city adopted updates to the Engineering Design Manual and associated development regulations to align local design standards with PROWAG and WSDOT design guidance. These updates ensure that all new transportation projects and development-related improvements incorporate accessible pedestrian infrastructure that meets current accessibility standards.

The city applies these engineering standards to both publicly funded projects and private development projects that construct or modify infrastructure within the public ROW.

4.5 Application of Accessibility Standards

Accessibility standards apply differently depending on whether a project involves new construction, alterations to existing infrastructure, or routine maintenance activities.

New Construction

For new construction projects, all pedestrian facilities must be fully compliant with current accessibility standards. This includes sidewalks, curb ramps, pedestrian crossings, and pedestrian signals constructed as part of new roadway or intersection projects.

New pedestrian facilities must meet the technical requirements established by PROWAG and the WSDOT Design Manual.

Alterations

Projects that modify existing facilities in a way that affects usability are considered alterations under ADA regulations. Examples include roadway reconstruction, intersection reconstruction, and major resurfacing projects.

When alterations occur, pedestrian facilities within the project area must be brought into compliance with current accessibility standards to the maximum extent feasible (MEF). This requirement ensures that accessibility improvements are incorporated whenever existing infrastructure is modified.

Typical alterations that trigger accessibility improvements include:

- roadway resurfacing
- roadway reconstruction
- intersection reconstruction
- sidewalk replacement
- traffic signal upgrades

Maintenance Activities

Routine maintenance activities generally do not trigger full accessibility upgrades. Examples include crack sealing, pothole repair, and vegetation trimming.

However, maintenance activities may still improve accessibility by correcting minor barriers such as:

- vertical offsets in sidewalks(faulting)
- minor surface deterioration
- obstructions within pedestrian access routes

Where feasible, the city coordinates maintenance activities with accessibility improvements to improve

4.6 Engineering Practices for Accessible Design

The city incorporates accessibility considerations into all phases of transportation project development, including planning, design, and construction.

Engineering practices used by the city include:

- evaluating pedestrian access routes during project scoping
- identifying accessibility barriers during field inspections
- incorporating ADA improvements into capital project design
- coordinating accessibility upgrades with pavement preservation projects
- verifying compliance with accessibility standards during design review

Capital and Engineering Services divisions within the Department of Planning & Public works review project plans to confirm that accessibility requirements are incorporated into

project design. Construction inspection also verifies that accessibility features are constructed in accordance with approved plans and specifications.

These engineering practices ensure that accessibility improvements are consistently integrated into transportation projects throughout the city.

Chapter 5 – Methods to Improve Accessibility

The City of Lakewood can implement accessibility improvements through several infrastructure and maintenance programs. Each program addresses accessibility in different ways and together they support the systematic removal of pedestrian barriers throughout the public right-of-way (ROW).

5.1 Implementation Programs

Program	Description	ADA Improvements Delivered	Typical Delivery Method
ADA Improvement Program	Retrofits and replace non-compliant pedestrian facilities within the existing sidewalk network. This program focuses on correcting accessibility deficiencies rather than expanding sidewalks. Projects are prioritized using the methodology described in Chapter 6.	Replacement of non-compliant curb ramps, sidewalks, and pedestrian accessibility features.	Stand-alone ADA projects are constructed through publicly procured small works rosters and/or bids. Projects are incorporated into the City's Six-Year Transportation Improvement Program (TIP) and Capital Improvement Plan (CIP).
Capital Improvement Projects	New construction and full roadway reconstruction projects automatically upgrade pedestrian facilities within the project limits.	Sidewalk reconstruction, curb ramp upgrades, accessible pedestrian signals, and other accessibility improvements.	Delivered as part of larger capital projects; typically, the most cost-effective method for ADA upgrades through publicly procured small works rosters and/or bids. Projects are incorporated into the

Program	Description	ADA Improvements Delivered	Typical Delivery Method
			City's Six-Year Transportation Improvement Program (TIP) and Capital Improvement Plan (CIP).
Roadway Resurfacing Program	Roadway preservation treatments may constitute an "alteration" under ADA guidance and require accessibility upgrades at affected crossings.	Installation or replacement of curb ramps and pedestrian push buttons at intersections affected by paving projects.	Implemented automatically during full paving or resurfacing projects following FHWA and DOJ guidance.
Sidewalk Maintenance Program	Routine maintenance activities address deterioration and safety issues in pedestrian facilities.	Grinding vertical offsets, crack repair, vegetation trimming, and patching. Does not correct non-compliant design features such as slope or width.	Performed by City Parks maintenance staff as part of ongoing infrastructure maintenance.
Development Frontage Improvements	Private development projects must construct frontage improvements that meet current accessibility standards. This includes rebuilding non-compliant	Construction or reconstruction of sidewalks, curb ramps, and accessible pedestrian routes along development frontages.	Implemented through permit review requirements; improvements are constructed by private developers.

Program	Description	ADA Improvements Delivered	Typical Delivery Method
	infrastructure in the ROW.		

5.2 Milestones

To support implementation of the ADA Transition Plan, the City has established several milestones that guide accessibility improvements and help measure progress over time.

Milestone	Frequency	Purpose
Inventory Update	Annual	Update facility condition data and incorporate improvements completed through capital projects.
Prioritization Update	Annual	Recalculate priority scores to reflect updated facility conditions and community feedback.
Capital Programming	Biennial	Integrate ADA improvements into the City's Six-Year Transportation Improvement Program and Capital Improvement Program.
ADA Transition Plan Update	Every 3–5 years	Review progress, update cost estimates, and refine prioritization methodology.

These milestones help ensure that accessibility improvements remain integrated with the City's capital planning and budgeting processes.

5.3 USDOJ Recognized Limitations

New or altered streets must include curb ramps wherever pedestrian walkways intersect with curbs. Resurfacing triggers this requirement; pothole filling alone does not. At unaltered existing facilities, curb ramps are not strictly required, though the city may install them proactively. Where ramps already exist on an alternative route, a marginally longer path of travel may satisfy program access requirements.

The correction program establishes planned milestones for curb ramp compliance, prioritizing walkways serving government facilities, transit stops, public accommodations, and business districts before residential areas. A procedure for installing ramps upon request will also be established.

5.4 USDOJ Standards – Limitations

Federal regulations recognize that standards change over time and provide several limitations on the obligation to retrofit existing facilities:

- **Program access**: does not require every existing facility to be made individually accessible, only that each service, program, or activity be accessible when viewed in its entirety.
- **Structural impracticability**: full compliance is excused only in rare cases where unique terrain characteristics make accessibility features physically impossible to incorporate. The city will address alteration projects to the MEF.

These limitations are incorporated into the City's planning programs.

Chapter 6 - Prioritization

6.1 Summary

Effective prioritization is essential to developing rational budgets and implementing the ROW Transition Plan. In Chapter 3- Self Evaluation, this current facility collected in 2021 ranked by condition poor, fair, or good using specific design elements.

Additionally, the city has historically prioritized improvements primarily as transportation capital improvement occur, secondarily when ramps or buttons are problematic, or identified in the field through routine inspection runs. All new construction and reconstruction projects that require frontage improvements provide upgrades to pedestrian facilities. An important part of this Plan then is the development of a priority process that addresses those facilities that may not be included in both capital projects and private development.

This Chapter balances the operational demands of the broader transportation system against the need to systematically upgrade ROW pedestrian facilities within the constraints of City resources.

In future updates, the city should consider additional quantitative systems to rank facilities by relative need.

6.2 Scoring Factors Enhancements

To guide implementation of the ADA Transition Plan, the City of Lakewood should apply a prioritization framework to identify locations where accessibility improvements to existing facilities will provide the greatest benefit. Because the number of existing facilities requiring upgrades exceeds available annual funding, improvements must be implemented in phases over time.

The prioritization methodology evaluates several factors that reflect both physical accessibility barriers and potential pedestrian demand. These factors include facility condition, traffic volume, proximity to key pedestrian destinations, and public ADA complaints. Each factor is assigned a score and weighted to reflect its relative importance in identifying locations where accessibility improvements are most needed.

The scoring system is intended to function as a planning and budgeting tool rather than a strict engineering determination of compliance. Some facilities may fall short of current ADA or PROWAG standards in relatively minor ways, such as slightly exceeding a slope threshold, while remaining usable by most individuals with disabilities. The prioritization

framework allows the city to focus limited resources first on locations with the most significant accessibility barriers or the highest potential demand for accessible pedestrian routes.

6.2.1 Facility Condition

Facility condition is the primary factor used to evaluate the degree to which a pedestrian facility restricts accessibility. This category assesses the physical condition and level of ADA compliance of sidewalks, curb ramps, driveways, and related pedestrian infrastructure within the public right-of-way (ROW).

Rating	Description	Score
Green	Compliant with ADA standards	0
Light Green	Non-compliant, functional	3
Yellow	Non-compliant, limited functionality	7
Red	Non-compliant, non-functional	10

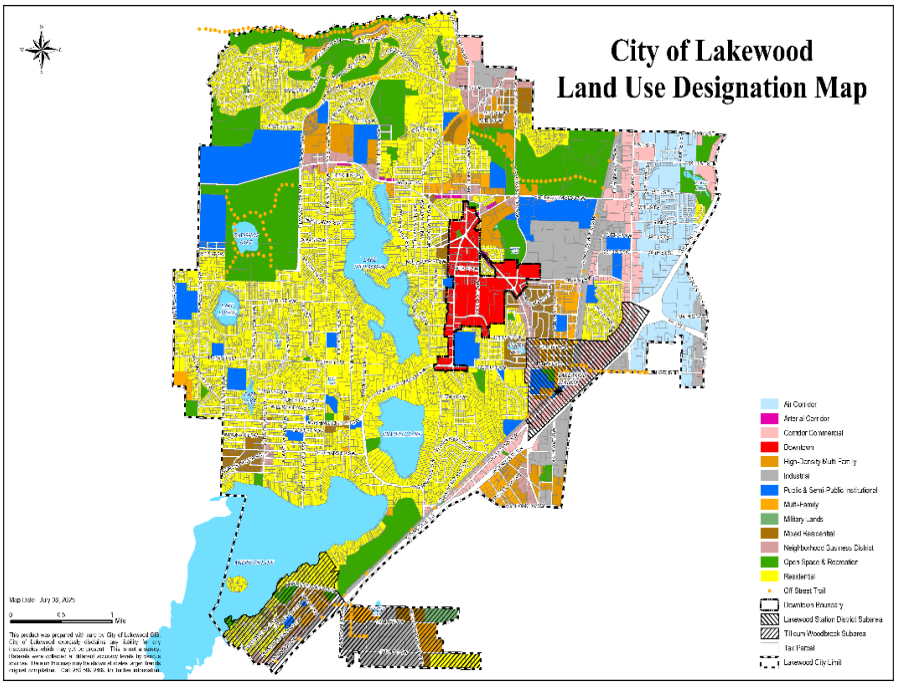
6.2.2 Traffic Volume

The City currently does not collect pedestrian count data for facilities within the public ROW. As a result, pedestrian activity levels are estimated using Average Daily Traffic (ADT) and roadway classification as proxy indicators of potential pedestrian demand. Roadways with higher traffic volumes and higher functional classifications may typically serve areas with greater pedestrian activity and access to destinations. Roadway classifications used for this evaluation are defined in Lakewood Municipal Code (LMC) Title 12.

Roadway Classification	ADT Range	Prioritization Score
Local Street	< 2,000	10
Collector Arterial	100 – 1,000	20
Minor Arterial	5,000 – 10,000	30
Minor Arterial	10,000-20,000	40
Principal Arterial	20,000-30,000	50
Principal Arterial	>30,000	60

6.2.3 Proximity to Key Pedestrian Destinations

To ensure that facilities serving populations with greater accessibility needs are appropriately prioritized, the city recognizes that pedestrian demand among individuals with disabilities may not always correlate with roadway traffic volumes. Certain land uses generate higher levels of pedestrian activity among people who rely on accessible infrastructure, even when located on lower-volume streets.



As part of the prioritization process, the city should consider the presence of key pedestrian destinations within approximately two city blocks of a facility. Examples include medical and behavioral health facilities (such as St. Clare Hospital and Western State Hospital), eldercare and assisted living centers, educational institutions including Pierce College and K–12 schools, public parks and regional trail connections, and transit stops. These destinations often serve populations that disproportionately depend on accessible pedestrian routes.

Where multiple pedestrian generators are in the same area, this factor may increase the priority assigned to accessibility improvements. Conversely, the factor may be reduced in locations where high traffic volumes primarily reflect pass-through vehicle traffic rather than meaningful pedestrian demand.

Proximity (within two city blocks)	Score
No significant ADA-use	0
Moderate ADA use (e.g., small clinic)	10
High ADA use (e.g., schools, hospital, transit station)	20

6.2.4 ADA Complaints

Public complaints related to accessibility barriers are another factor considered in prioritizing improvements. This feedback helps identify locations where accessibility barriers are directly affecting community members and may not otherwise be captured through inventory data alone.

Complaints received within the previous twelve months are reviewed by staff and should be incorporated into the prioritization process. Locations receiving multiple complaints may receive additional priority to address barriers that are actively affecting use of the pedestrian network.

Complaints (Prior 12 Months)	Score
None	0
1 – 3	10
More than 3	20

6.3 Priority Ratings

Each prioritization factor described above is assigned a weighting to reflect its relative reliability as an indicator of accessibility need. The weighted scores are combined to produce an overall priority score for each facility. This score helps guide implementation of the City's accessibility improvement program within the ROW, including curb ramp replacements, sidewalk upgrades, and other pedestrian accessibility improvements.

Factor	Score Percentage	Weight Factor
Facility Condition	50%	5
Traffic Volume	20%	0.33
Known ADA Use	20%	1
ADA Complaints	10%	0.5

The weighted score for each facility is calculated by multiplying each factor score by its weight and summing the results. The maximum possible score is 100 points. The combined score is used to assign each facility to a Priority Tier as shown in the table below. Tier assignment determines the order in which facilities are addressed in the City's annual ADA improvement program incorporated into the TIP and CIP. Adjustments to tier assignments based on field conditions, safety concerns, or coordination with scheduled capital projects should be considered.

Priority Tier	Combined Score	Implementation Timing
Tier 1 – High	70 – 100	Address in biennium budget cycles; include in next stand-alone ADA project or capital project within project limits.
Tier 2 – Medium	40 – 69	Program for improvement within the TIP; prioritize for inclusion in capital or resurfacing projects within the planning horizon.
Tier 3 – Low	0 – 39	Address through long-range planning or as opportunity arises through development frontage or maintenance programs; revisit in next plan update.

6.4 Application of Priority Scores

The prioritization framework described in this chapter provides a structured method for identifying locations where accessibility improvements will have the greatest benefit. The scoring system combines physical facility conditions with indicators of pedestrian demand to help direct limited resources toward the most critical accessibility barriers.

Priority scores are used to inform:

- Development of stand-alone ADA improvement projects
- Inclusion of accessibility upgrades in capital improvement projects
- Planning of pedestrian safety and corridor improvement projects
- Long-range transportation planning efforts

The prioritization framework is intended to guide decision-making rather than replace professional judgment. In some cases, field conditions, public safety concerns, or coordination with other infrastructure projects may justify adjustments to priority rankings.

Chapter 7 – Planning Level Estimates & Funding Opportunities

7.1 Budget & Funding Opportunities

The City of Lakewood is currently preparing its 2027–2028 biennium budget, which incorporates priorities identified in the updated Six-Year Transportation Improvement Program (TIP) and Capital Improvement Plan (CIP). These programs identify planned capital investments and ADA accessibility improvements for pedestrian facilities within the public right-of-way (ROW).

Primary local transportation funding sources include:

- **Real Estate Excise Tax (REET):** Local tax on property sales used for eligible capital improvements.
- **General Fund Transfers:** General municipal revenues that support street capital projects and pavement preservation.
- **Transportation Benefit District (TBD):** $20 annual vehicle license fee for transportation improvements.
- **General Obligation (GO) Bonds:** Debt financing used to deliver larger capital transportation projects.
- **Transportation Mitigation Fees (TMF):** Development fees supporting transportation capacity improvements in the Downtown Subarea.

These sources provide the primary local funding and grant match for the City's transportation capital program. Regional, state and federal grants that may assist in the implementation of ADA accessibility improvements are listed below.

Program	Administering Agency	Purpose / Eligibility
Highway Safety Improvement Program (HSIP)	Federal Highway Administration (administered through WSDOT)	Funds projects that reduce traffic fatalities and serious injuries; curb ramp upgrades and accessible pedestrian signal improvements at high-crash locations may qualify.

Program	Administering Agency	Purpose / Eligibility
Congestion Mitigation and Air Quality (CMAQ)	Federal Highway Administration (administered through WSDOT & PSRC)	Supports transportation projects that reduce congestion and improve air quality, including pedestrian infrastructure that supports shifts to non-motorized travel.
Transportation Alternatives Program (TAP)	Federal Highway Administration (administered through WSDOT & PSRC)	Provides funding for non-motorized infrastructure such as sidewalks and ADA curb ramp improvements.
Safe Routes to School (SRTS)	WSDOT	Funds improvements within approximately two miles of K–12 schools that improve safety for students walking or bicycling to school.
Bike and Pedestrian Grant	WSDOT	Funds bicycle and pedestrian improvements, grant call is at the same time as the SRTS grants and evaluated at the same time.
Urban Active Transportation Program & Complete Streets Program	Washington State Transportation Improvement Board (TIB)	Supports pedestrian safety improvements including sidewalks and curb ramps.

7.2 Planning Level Cost Estimate

The city prepared a planning-level cost estimate to address pedestrian facilities identified as deficient in the 2021 ADA inventory. The estimate focuses primarily on facilities categorized as poor condition, which represent the most significant accessibility barriers.

The estimated cost to address facilities in poor condition is approximately $34.1M. This estimate includes allowances for design, construction management, and contingency.

Sidewalk reconstruction represents the largest cost category, followed by driveway reconstruction and slope correction. Smaller portions of the estimated program cost are associated with accessible pedestrian signal upgrades and curb ramp reconstruction.

If improvements are expanded to include facilities categorized as fair condition, the estimated total program cost increases to approximately $63.9M. Facilities in fair condition typically remain functional but may require repair or upgrades to meet current accessibility standards.

These estimates are considered a planning-level estimate and will be refined as the City completes the 2026 inventory update and as project-level engineering is performed through the Capital Improvement Program.

Facility Type (Poorly Ranked)	Estimated Cost	Percent of Total	Key Needs Identified
Driveways	$12.9 million	37.8%	Reconstruction at locations exceeding ADA slope limits
Sidewalks	$16.7 million	49.0%	Replacement of poor-condition segments and repair of fair-condition segments
Curb Ramps	$1.9 million	5.6%	Rebuilding deficient ramps and installing missing ramps
Accessible Pedestrian Signals (APS)	$2.6 million	7.6%	Upgrades at non-compliant signalized intersections
Total Estimated Program Cost	**$ 34.1 million**	**100%**	Systemwide ADA improvements

Sidewalk reconstruction represents the largest cost category (49%), reflecting locations where it exceeds ADA/PROWAG limits. Driveway reconstruction and repair represent the second largest cost component (38%), followed by curb ramp upgrades and Accessible Pedestrian Signal (APS) improvements.

If improvements also include facilities ranked in fair condition, the estimated planning-level program cost increases to approximately $63.9M or by 47%. Fair-condition facilities generally include infrastructure that remains functional but does not fully meet current design standards or may require repair to prevent further deterioration. Facilities classified as fair condition may also reflect a range of issues, including minor surface deterioration, slope conditions approaching ADA/PROWAG thresholds, or partial non-compliance that

does not yet require full reconstruction. Further field investigation is needed on facilities ranked fair.

Improvement Scope	Estimated Program Cost	Description
Poor Condition Facilities Only	$34.1 million	Address locations with significant accessibility deficiencies requiring reconstruction.
Poor + Fair Condition Facilities	$63.9 million	Includes major, moderate and minor condition facilities that may require repair or upgrades to meet current accessibility standards. *Additional field assessment using PROWAG needed for facilities classified as fair.*

These estimates do not include the forthcoming 2026 inventory update, which will refine facility condition ratings and incorporate improvements completed since the original 2021–2022 self-evaluation.

For biennium budget discussions, the City's baseline ADA improvement program is currently striving to dedicate $260,000 annually (2026 dollars) toward accessibility improvements.

Because the City's pedestrian facility inventory is still being refined, and the prioritization methodology described in Chapter 6 introduces additional evaluation factors, these estimates should be considered planning-level, preliminary only. The city relies on representative unit costs derived from recent local construction projects, which will be refined as the 2026 inventory update and project-level engineering advance in the adopted CIP.

7.3 Implementation

Revenues to support ADA improvements are limited. Because the number of pedestrian facilities requiring accessibility improvements exceeds available annual funding, implementation of the ADA Transition Plan will occur incrementally over time. Consistent with guidance from the U.S. Department of Justice and the Washington State Department of Transportation (WSDOT) Local Agency Guidelines (LAG), accessibility improvements will

be prioritized and implemented in phases based on the severity of accessibility barriers, available funding, and coordination with other transportation projects.

To satisfy 28 CFR § 35.150(d)(3) and WSDOT LAG Chapter 29, the plan must include a schedule of accessibility improvements. The table below provides a tentative schedule, organized by biennium budget cycle. Facilities are scheduled consistently with the Priority Tier methodology in Chapter 6. Tier 1 (high priority) facilities are targeted first, followed by Tier 2 facilities as funding allows.

Year	Estimated Investment	Priority Activities / Facility Types	Priority Tier Target	Responsible Party
2027-2032	$260,000 (baseline annually + grants if available)	Adopt ADA Transition Plan. Complete 2026 GIS inventory update. Identify Tier 1 curb ramp and APS upgrades for 2027–2028 TIP/CIP. Begin APS upgrades at highest-priority signalized intersections serving transit, schools, and medical facilities.	Tier 1	Planning & Public Works
2032-2044	$260,000+ (local + grants)	Complete remaining Tier 1 facilities. Begin Tier 2 (medium priority) facilities. Conduct comprehensive plan update, refresh inventory, scores, and this implementation table. Apply for TAP, TIB, or HSIP grants to accelerate program.	Tier 1complete Tier 2 begins	Planning & Public Works

This schedule represents a planning-level implementation framework rather than a fixed construction timeline. The pace of improvement will depend on several factors, including:

- availability of local funding within the City's biennial budget
- success in securing state and federal transportation grants
- opportunities to incorporate accessibility upgrades into transportation capital programs and resurfacing projects
- as growth occurs over time, improvements constructed through private development frontage requirements

Following adoption of the annual budget, the Planning & Public Works Department will be responsible for implementing the transportation improvement projects programmed for that budget year. Project delivery will occur in accordance with the priorities and funding allocations established in the City's adopted CIP.

Routine maintenance of pedestrian facilities, including sidewalks and related infrastructure, levels of serve will be performed through maintenance and operations services administered by the Parks & Recreation Department.

Chapter 8 – Recommendations & Monitoring Progress

8.1 Purpose

The recommendations in this chapter provide guidance for implementing and maintaining the City's ADA Transition Plan over time. While earlier chapters describe the City's existing infrastructure inventory, updates to a prioritization methodology, and funding framework, this chapter outlines how the city will continue advancing accessibility improvements and evaluating progress.

The ADA Transition Plan is intended to function as a living planning document that evolves as infrastructure conditions change, new standards emerge, and community input identifies new accessibility needs. Recommendations therefore focus on strengthening three core areas:

- Continuous improvement of the pedestrian facility inventory
- Integration of ADA improvements with capital planning and maintenance programs
- Monitoring progress and ensuring transparency with the public

These actions will help ensure that accessibility improvements remain coordinated with the City's transportation investment programs and that barriers are removed systematically over time.

8.2 Progress Made

Documenting progress is a key component of a credible ADA Transition Plan. It demonstrates the City's commitment to continuous improvement and provides accountability to the community. The following summarizes progress made since the City's original ADA inventory and planning efforts:

- **GIS Inventory Completed (2021):** The City completed a comprehensive field inventory of all curb ramps and pedestrian push buttons, which was entered into the City's GIS database. This forms the baseline for measuring future progress.
- **Capital Projects (2021–2025):** Numerous capital improvement projects since the 2021 inventory have included ADA upgrades to curb ramps, sidewalks, and pedestrian signals. The 2026 inventory update will document these improvements and remove corrected deficiencies from the active priority list.
- **Standards Updated (2026):** The City updated its Engineering Standards Manual, City Standard Plans, and LMC Title 12 to align with the 2023 PROWAG, effective

March 2026. This ensures all future construction automatically meets current accessibility standards.

- **ADA Transition Plan Adopted (2026):** This document represents the City's first formally adopted ADA Transition Plan for public rights-of-way, establishing a structured framework for achieving accessibility compliance.

In future updates, the city should include a tabular summary of ADA improvement projects completed since the prior update, including project name, location, type of improvement, number of facilities upgraded, and cost. This record of progress provides accountability and demonstrates the return on public investment in ADA compliance.

8.3 Key Recommendations

8.3.1 Maintain and Update the ADA Facility Inventory

The City's GIS-based inventory of pedestrian facilities provides the foundation for identifying accessibility barriers and prioritizing improvements. Refinement of this inventory is essential to maintaining an effective ADA Transition Plan. Recommended actions include:

- Completing the 2026 inventory update to incorporate accessibility improvements constructed since the original 2021 field survey.
- Updating facility condition ratings and GIS attributes as projects are completed.
- Incorporating additional data fields that support prioritization, including pedestrian demand indicators and proximity to key destinations.
- Maintaining consistent data collection standards to ensure comparability across future inventory updates.

As improvements are completed through capital projects, resurfacing programs, and maintenance activities, the number of non-compliant facilities in the inventory should decrease. Updated inventories will therefore provide an increasingly accurate picture of remaining accessibility barriers.

8.3.2 Continue to Integrate ADA Improvements with Projects

The City's transportation capital program provides one of the most efficient opportunities to deliver accessibility improvements. Roadway reconstruction, corridor improvements, and signal upgrades typically require pedestrian facilities within the project area to be upgraded to current standards. To maximize the effectiveness of these opportunities, the city should:

- Continue integrating ADA improvements into Capital Improvement Plan (CIP) and the Six-Year Transportation Improvement Program (TIP).
- Ensure that roadway resurfacing projects include curb ramp upgrades where required by federal ADA guidance.
- Coordinate accessibility improvements with corridor reconstruction projects and intersection upgrades.
- Continuing requiring frontage improvements meeting current accessibility standards through private development projects.

These coordinated approaches allow accessibility upgrades to be delivered as part of larger infrastructure investments, often at lower cost than stand-alone retrofit projects.

8.3.3 Maintain a Dedicated ADA Improvement Program

While many accessibility upgrades occur through capital projects, some barriers exist in locations that are unlikely to be addressed through corridor reconstruction or private development. A dedicated ADA improvement program is therefore necessary to address these remaining deficiencies.

The City should maintain a baseline annual program that funds stand-alone ADA improvements, including:

- Replacement of non-compliant curb ramps
- Reconstruction of sidewalks with accessibility deficiencies
- Correction of driveway cross slopes affecting pedestrian access routes
- Upgrades to Accessible Pedestrian Signals (APS)

This program allows the city to address the highest-priority accessibility barriers identified through the prioritization methodology described in Chapter 6.

8.3.4 Strengthen Coordination with Other Planning Documents

The policy review conducted during preparation of this ADA Transition Plan found that accessibility objectives are supported across the City's planning documents. However, stronger coordination between planning efforts would improve implementation. Future plan updates should consider:

- Aligning update cycles between the ADA Transition Plan and the Non-Motorized Transportation Plan.
- Incorporating references to ADA improvement priorities in relevant subarea plans and corridor studies.

- Using pedestrian demand indicators, such as transit stations, schools, medical facilities, and major employment centers, to inform accessibility improvement priorities.

Improved coordination across planning documents will help ensure accessibility improvements are consistently considered during transportation planning and capital programming.

8.3.5 Expand Public Engagement and Reporting

Public input plays an important role in identifying accessibility barriers that may not be captured through inventory data alone.

The city should continue to encourage public participation by:

- Maintaining the ADA Transition Plan project webpage and providing opportunities for online comment submission.
- Providing updates through the City Manager's bulletin, social media platforms, and other communication channels.
- Encouraging residents to report accessibility issues through the City's service request system MyLakewood311.
- Continuing outreach to disability advocacy organizations and community partners.

Documenting public feedback and responses helps ensure that emerging accessibility concerns are incorporated into future plan updates.

8.4 Monitoring Progress

Monitoring progress is a critical component of implementing the ADA Transition Plan. Progress monitoring ensures that accessibility improvements are delivered as planned and that the City's investment strategies remain aligned with accessibility needs.

To track progress toward improving accessibility within the public rights-of-way, the city will monitor several performance indicators.

Performance Indicator	Tracking Method	Frequency
Percentage of compliant curb ramps	GIS inventory update	Annual
Accessible pedestrian signal upgrades completed	Capital project records GIS inventory update	Annual
Linear feet of sidewalk improved	Capital project records GIS inventory update	Annual
ADA complaints received and resolved	ADA grievance records	Annual

Performance Indicator	Tracking Method	Frequency
	GIS inventory update	

Tracking these indicators will help the city evaluate progress toward improving accessibility and identify areas where additional improvements may be needed.

Infrastructure conditions, construction costs, and accessibility standards evolve over time, the ADA Transition Plan should be periodically reviewed and updated. The city intends to:

- Review progress annually as part of the prioritization and budgeting process.
- Conduct a comprehensive update to the ADA Transition Plan approximately every three to five years.
- Coordinate plan updates with other City planning efforts when possible.

Regular updates will ensure that the ADA Transition Plan remains current and continues to guide accessibility improvements effectively.

8.5 Future Plan Updates

The ADA Transition Plan will continue to evolve as accessibility improvements are constructed, infrastructure conditions change, and community feedback identifies new accessibility needs. Future updates may incorporate improved inventory data, refined prioritization methodologies, and updated cost estimates.

The city anticipates conducting a comprehensive update to the ADA Transition Plan approximately every three to five years, consistent with transportation planning cycles and updates to related City planning documents.

Appendix A – WSDOT LAG Manual Compliance

The following matrix summarizes how the ADA Transition Plan prepared by the City of Lakewood addresses the elements recommended in the Local Agency Guidelines (LAG) Manual Chapter 29 published by the Washington State Department of Transportation (WSDOT).

This crosswalk also provides a useful reference for future updates to the ADA Transition Plan and helps ensure that the city continues to meet state and federal accessibility planning expectations.

WSDOT LAG ADA PLAN ELEMENT	DESCRIPTION	LAKEWOOD ADA PLAN SECTION	Notes
ADA Coordinator & Grievance Procedure	Identification of the staff member responsible for coordinating ADA compliance and a formal grievance procedure for reporting accessibility concerns.	Introduction Appendix B	The City's ADA Coordinator role is assigned to the Human Resources Manager. A formal grievance procedure is included in Appendix B. Accessibility concerns can also be submitted through the City's website accessibility page and service request system. Accessibility - City of Lakewood
Public Participation	Opportunity for individuals with disabilities, advocacy organizations, and the public to participate in development of the ADA Transition Plan.	Chapter 2 Public Involvement Appendices C & F	Public engagement occurs through Planning Commission meetings, hearing, City Council review, stakeholder outreach, and public comment opportunities. Future updates will continue to

WSDOT LAG ADA PLAN ELEMENT	DESCRIPTION	LAKEWOOD ADA PLAN SECTION	Notes
			expand outreach methods, including multilingual engagement and improved accessibility of public participation materials.
Inventory of Barriers **Self-Evaluation**	Evaluation of policies, programs, and facilities to identify accessibility barriers within the public right-of-way.	Chapter 3 Self-Evaluation	The city conducted a pedestrian facility inventory in 2021. Field data were collected by City staff and incorporated into the City's GIS database. Capital improvements completed since that time have reduced the number of deficiencies. A 2026 inventory update will document improvements and update facility condition data.
Prioritization Methodology	Description of the methodology used to prioritize removal of accessibility barriers.	Chapter 6 Prioritization Methodology	Accessibility improvements are prioritized based on facility condition, traffic volume, proximity to key destinations serving individuals with disabilities, and ADA complaints. GIS data are used to support prioritization and project planning.

WSDOT LAG ADA PLAN ELEMENT	DESCRIPTION	LAKEWOOD ADA PLAN SECTION	Notes
Implementation Methods & Funding Strategy	Description of the programs used to remove accessibility barriers and identification of funding sources supporting accessibility improvements.	Chapter 5 Methods Used to Improve Accessibility Chapter 7 Planning Level Estimates & Funding Opportunities	Accessibility improvements are delivered through capital improvement projects, roadway resurfacing programs, stand-alone ADA retrofit projects, routine maintenance activities, and frontage improvements constructed through private development. Funding sources include local revenues, grants, and transportation programs.
ADA Policy Statement	Statement confirming the agency's commitment to nondiscrimination and accessibility.	Introduction Appendix B	Although not explicitly required for ADA Transition Plans under LAG guidance, including a reference to the City's ADA policy statement and accessibility webpage is considered a best practice and supports transparency and public awareness.
Implementation Schedule	Description of how accessibility improvements will be implemented over time.	Chapter 7 Planning Level Estimates & Funding Opportunities	The plan outlines a phased implementation strategy prioritizing facilities in poor condition first, followed by facilities in fair condition. Implementation will occur over multiple capital planning

WSDOT LAG ADA PLAN ELEMENT	DESCRIPTION	LAKEWOOD ADA PLAN SECTION	Notes
			cycles depending on available funding and opportunities to integrate improvements into transportation projects.
Monitoring and Updates	Description of how progress will be tracked and how the plan will be updated.	Chapter 8 Recommendations & Monitoring Progress	The city intends to update the ADA Transition Plan approximately every three to five years. Improvements are incorporated into the Six-Year Transportation Improvement Program (TIP) and funded through the City's biennial budget process. Progress is monitored through GIS inventory updates and documentation of completed projects.

Appendix B – Lakewood ADA Grievance Form

City of Lakewood

ADA Grievance Form

COMPLAINT OF ACCESS VIOLATION OR DISCRIMINATION ON THE BASIS OF DISABILITY

The City of Lakewood will make every reasonable effort to ensure that confidentiality is maintained throughout the complaint and investigation process, to the extent consistent with the law, adequate investigation, and appropriate corrective action. This means that the City will share any sensitive information you provide here only on a need-to-know basis.

Individual identifying access violation or discrimination

Name _____

Address _____

Telephone _____ Email _____

Authorized representative of individual above (if any)

Name _____

Address _____

Telephone _____ Email _____

1. Please describe the City's alleged violation of access requirements, or discriminatory action, in detail so that the nature of your grievance can be clearly understood. Add pages if necessary:

2. Please give the date(s), time(s) and location(s) of the incident(s) or observation(s) you are reporting:

3. If the incident involves a City of Lakewood employee(s) please provide his or her name(s), if known:

(City of Lakewood ADA Grievance Form 8/22/2023) **FRONT**

4. If the grievance involves physical access to a City of Lakewood public facility, land, or right-of-way, please provide the specific address(s) of those locations, if known:

5. Please give the name(s) and address(es), if known, of any witnesses to the access violation or alleged discrimination:

6. If this complaint is filed on behalf of a second person, or on behalf of a group of people, please provide the names and addresses of all of the grievants, if possible:

7. What action do you want taken to correct the alleged access violation or discrimination?

8. Is there any other information you want the City to know concerning your grievance?

Signature: _____

(Filling in the name is an acceptable signature for this form.)

Date: _____

Signature of (check a box below or the form will auto select an option for you by default)

- ☐ Observer of alleged access violation.
- ☐ Victim of alleged discrimination.
- ☒ Authorized representative.

Submit this form to the appropriate department head, or to Mary McDougal, the City ADA Coordinator.

(City of Lakewood ADA Grievance Form 8/22/2023) **BACK**

Appendix C – Notice of ADA Transition Plan

Onyx Drive ADA Improvements at 97th Ave. SW

The Americans with Disabilities Act (ADA) is a civil rights law that prohibits discrimination against individuals with disabilities in all areas of public life. As part of ADA planning requirements, public agencies must develop an ADA Transition Plan to evaluate existing facilities within the public road rights of way such as sidewalks, curb ramps, and pedestrian signals. ADA also requires the city to outline efforts to correct findings of non-compliance.

The City of Lakewood is preparing its ADA Transition Plan. As part of this project, we will be seeking public input to help identify barriers that impede access for people with disabilities to city right of ways.

Persons with disabilities, organizations representing persons with disabilities, transit agencies and the public are invited to comment and refine the draft. A tentative milestone schedule is shown below:

- January 23, 2026 City Manager Bulletin: Announcing development of an ADA Transition Plan
- February 10, 2026 – ADA Transition Plan webpage available
- March 2, 2026: ADA Transition Plan Brief to CM
- March 9, 2026 Council study session: ADA Transition Plan Overview
- March 18, 2026 Planning Commission Study Session: ADA Transition Plan Overview
- March 18, 2026: draft ADA Transition Plan added to website
- March 19, 2026 Stakeholder Engagement via e-mail – draft plan
- March 20, 2026 City Manager Bulletin: Announcing draft ADA Transition Plan
- April 1, 2026 Planning Commission: Review of the draft ADA Transition Plan
- April 15, 2026 Planning Commission: Hearing on draft ADA Transition Plan
- May 6, 2026 Planning Commission: ADA Transition Plan Recommendation to Council

- May 11, 2026 Council study session: Review of the Planning Commission Recommendation
- June 1, 2026 Council Adoption of 2026 ADA Transition Plan
- Week of June 1, 2026 website update: adopted 2026 ADA Transition Plan

Please check this website https://cityoflakewood.us/accessibility for future updates.

Project Contact
City of Lakewood Planning & Public Works
Weston Ott, City Engineer
Email: wott@cityoflakewood.us
Mailing Address: 6000 Main Street, Lakewood WA 98499

ADA Coordinator
Nicole Camus, HR Manager
Email: ncamus@cityoflakewood.us

Draft Document Elements for Public Review and Comment
Press Release
Draft ADA Transition Plan

Helpful Links
ADA Grievance Form
LMC Chapter 12.03 Standards, Specifications
LMC Chapter 12.18 Complete Streets Policy
Capital Projects Division

Appendix D – Planning Level Cost Estimates

CITY OF LAKEWOOD · ADA RIGHT-OF-WAY FACILITY UPGRADES — PLANNING LEVEL COST ESTIMATE

2026 Dollars · Planning-Level Accuracy ±30–50% · Based on Custer Road Bid Tabulation (Feb 2026)

Design & Engineering Rate:	**15.0%**
CM & Closeout Rate:	**10.0%**
Construction Contingency Rate:	**20.0%**

FACILITY TYPE / WORK ITEM	QTY	UNIT	UNIT COST (Materials & Construction)	MATERIALS & CONSTRUCTION	DESIGN & ENGINEERING (15%)	CM & CLOSE OUT (10%)	20% CONTINGENCY	PLANNING LEVEL TOTAL	% OF GRAND TOTAL
CURB RAMPS									
Rebuild Existing — Poor Condition	102	EA	$12,500	$1,275,000	$191,250	$127,500	$318,750	**$1,912,500**	3.0%
Rebuild Existing — Fair Condition	245	EA	$8,000	$1,960,000	$294,000	$196,000	$490,000	**$2,940,000**	4.6%
New / Missing Curb Ramps	25	EA	$12,500	$312,500	$46,875	$31,250	$78,125	**$468,750**	0.7%
SUBTOTAL — CURB RAMPS				**$3,547,500**	**$532,125**	**$354,750**	**$886,875**	**$5,321,250**	**8.3%**
[i] *Unit costs: avg Custer Rd bids; Fair = 64% of full rebuild cost*									
SIDEWALKS (6-ft Width)									
Replace / Reconstruct — Poor Condition	17,107	LF	$650	$11,119,550	$1,667,933	$1,111,955	$2,779,888	**$16,679,325**	26.1%
Repair & Overlay — Fair Condition	79,214	LF	$200	$15,842,800	$2,376,420	$1,584,280	$3,960,700	**$23,764,200**	37.2%
SUBTOTAL — SIDEWALKS				**$26,962,350**	**$4,044,353**	**$2,696,235**	**$6,740,588**	**$40,443,525**	**63.3%**

CITY OF LAKEWOOD · ADA RIGHT-OF-WAY FACILITY UPGRADES — PLANNING LEVEL COST ESTIMATE

2026 Dollars · Planning-Level Accuracy ±30–50% · Based on Custer Road Bid Tabulation (Feb 2026)

Design & Engineering Rate:	**15.0%**
CM & Closeout Rate:	**10.0%**
Construction Contingency Rate:	**20.0%**

FACILITY TYPE / WORK ITEM	QTY	UNIT	UNIT COST (Materials & Construction)	MATERIALS & CONSTRUCTION	DESIGN & ENGINEERING (15%)	CM & CLOSEOUT (10%)	20% CONTINGENCY	PLANNING LEVEL TOTAL	% OF GRAND TOTAL
[i] *Qtys: 107 Poor segs × 50 LF avg; 510 Fair segs × 50 LF avg*									
DRIVEWAYS (24-ft Width, Transverse Slope Correction)									
Reconstruct — Poor Condition (slope > 5.0%)	636	EA	$13,500	$8,586,000	$1,287,900	$858,600	$2,146,500	**$12,879,000**	20.1%
Regrade / Minor Work — Fair Condition (2.1–5.0%)	441	EA	$4,000	$1,764,000	$264,600	$176,400	$441,000	**$2,646,000**	4.1%
SUBTOTAL — DRIVEWAYS				**$10,350,000**	**$1,552,500**	**$1,035,000**	**$2,587,500**	**$15,525,000**	**24.3%**
[i] *Poor = full reconstruct; Fair ≈ 30% regrading only*									
ACCESSIBLE PEDESTRIAN SIGNALS (APS) & PED. POLES									
Full Intersection APS Upgrade (4 poles + signals)	24	Intersect.	$73,000	$1,752,000	$262,800	$175,200	$438,000	**$2,628,000**	4.1%
Mounting Height Adjustment — Out-of-Range Buttons	3	EA	$1,500	$4,500	$675	$450	$1,125	**$6,750**	0.0%
SUBTOTAL — APS / PED. PUSH BUTTONS				**$1,756,500**	**$263,475**	**$175,650**	**$439,125**	**$2,634,750**	**4.1%**
[i] *96 non-compliant btns ÷ 4/intersection = 24 intersections; 3 height adjustments*									
GRAND TOTAL — ALL FACILITY TYPES				**$42,616,350**	**$6,392,453**	**$4,261,635**	**$10,654,088**	**$63,924,525**	**100.0%**
Only Poor Condition Ranked				**$22,732,550**	**$3,409,883**	**$2,273,255**	**$5,683,138**	**$34,098,825**	**100.0%**

CITY OF LAKEWOOD · ADA RIGHT-OF-WAY FACILITY UPGRADES — PLANNING LEVEL COST ESTIMATE

2026 Dollars · Planning-Level Accuracy ±30–50% · Based on Custer Road Bid Tabulation (Feb 2026)

Design & Engineering Rate:	**15.0%**
CM & Closeout Rate:	**10.0%**
Construction Contingency Rate:	**20.0%**

FACILITY TYPE / WORK ITEM	QTY	UNIT	UNIT COST (Materials & Construction)	MATERIALS & CONSTRUCTION	DESIGN & ENGINEERING (15%)	CM & CLOSEOUT (10%)	20% CONTINGENCY	PLANNING LEVEL TOTAL	% OF GRAND TOTAL

NOTES: ±30–50% planning-level accuracy. Quantities from 2021 Lakewood ADA Inventory. Unit costs from capital bid tab averages (Feb 2026).

Appendix E – Comments, Notices

To be updated prior to approval.

Appendix F – Glossary of Terms

The following definitions are provided to assist readers in understanding terminology used throughout this ADA Transition Plan.

ADA (Americans with Disabilities Act)
A federal civil rights law enacted in 1990 that prohibits discrimination against individuals with disabilities in all areas of public life, including employment, education, transportation, and access to public facilities and services. Title II of the ADA applies specifically to state and local governments.

ADA Coordinator
A designated City employee responsible for coordinating the City's compliance with Title II of the ADA. Responsibilities include overseeing the ADA Transition Plan, managing the ADA grievance process, and serving as a point of contact for accessibility-related inquiries. For the City of Lakewood, this role is held by the Human Resources Manager (Nicole Camus).

Accessible Pedestrian Signal (APS)
A device integrated into a pedestrian signal that communicates information about the WALK phase in non-visual formats (audible and/or vibrotactile) for use by individuals who are blind or have low vision.

Alteration
A change to an existing facility that affects or could affect the usability of the facility or a portion of the facility. Alterations trigger requirements to bring affected elements into compliance with current ADA or PROWAG standards to the maximum extent feasible. Resurfacing a street or sidewalk is generally considered an alteration.

Curb Ramp
A ramp constructed at a street crossing that cuts through or builds up to a curb, providing access for wheelchairs and other wheeled mobility devices from the sidewalk to the street. Curb ramps must include detectable warning surfaces to alert pedestrians with visual impairments.

Detectable Warning Surface
A standardized surface consisting of truncated domes that provides a tactile warning to pedestrians with visual impairments about the transition between a pedestrian route and a vehicular traffic area. Detectable warning surfaces are required at curb ramps, blended transitions, and certain other locations under PROWAG.

Maximum Extent Feasible (MEF)
A standard applied to alteration projects where full compliance with ADA requirements is not structurally practicable. In such cases, the city must document the physical constraints that prevent full compliance and must achieve the highest level of accessibility that is feasible.

Pedestrian Access Route (PAR)
A continuous, unobstructed path connecting all elements of a pedestrian circulation route, including sidewalks, curb ramps, blended transitions, crosswalks, and pedestrian street crossings. Under PROWAG, pedestrian access routes must meet minimum width, cross slope, and grade requirements.

PROWAG (Public Rights-of-Way Accessibility Guidelines)
Guidelines issued by the U.S. Access Board establishing technical requirements for accessible pedestrian facilities in the public right-of-way. PROWAG became effective in 2023 and provides the current accessibility standards for new construction and alterations in public rights-of-way.

Right-of-Way (ROW)
Land owned or controlled by a public agency for transportation purposes, including roads, sidewalks, curb ramps, and related infrastructure. This ADA Transition Plan addresses pedestrian facilities located within the City of Lakewood's public right-of-way.

Safe Harbor
A provision under 28 CFR § 35.150(b)(2) that protects elements in existing facilities from needing modification if they have not been altered since March 15, 2012, and they comply with the 1991 ADA Standards or the Uniform Federal Accessibility Standards (UFAS). Safe harbor does not apply to elements altered after March 15, 2012.

Self-Evaluation
A required assessment under 28 CFR § 35.105 in which a public entity reviews its services, policies, and practices to identify barriers to accessibility for individuals with disabilities. For public rights-of-way, this includes an inventory of pedestrian facilities to identify elements that do not meet current ADA or PROWAG standards.

Transition Plan
A document required under 28 CFR § 35.150(d) for public entities with 50 or more employees. The Transition Plan identifies structural changes needed to make programs accessible, establishes a schedule for those changes, and designates the official responsible for implementation. The plan must be made available for public inspection.

This is a transition plan for existing pedestrian facilities within the City's public rights-of-way.

Six-Year Capital Improvement Plan (CIP)

A Six-Year Capital Improvement Plan is part of the City of Lakewood's biennial budget process. While it shows anticipated funding and grants out six year, the first two years of the budget are secured appropriation approved by City Council.

Six-Year Transportation Improvement Program (6-Year TIP)

A six-year capital programming document updated annually by the City of Lakewood that identifies planned transportation projects and their funding sources. ADA accessibility improvement projects are incorporated into the TIP to ensure they receive formal funding authorization and are integrated into the City's Six-Year Capital Improvement Plan (CIP).