



City of Bremerton  
ADA Transition Plan  
for Pedestrian Curb Ramps  
and Pedestrian Push Buttons

October 12, 2016  
by Al King, PE





TABLE OF CONTENTS

INTRODUCTION..... 5

- Regulatory Framework and Guidance Documents..... 5
  - Section 504 of the Rehabilitation Act of 1973..... 5
  - Title II of the Americans with Disabilities Act (ADA) of 1990 ..... 5
  - Transition Plan Requirements..... 7
  - Best Management Practices ..... 7

TRANSITION PLAN DEVELOPMENT PROCESS..... 7

- ADA Advisory Committee ..... 8

PROGRAM ADMINISTRATION ..... 8

- The ADA Coordinator..... 8
  - An Effective ADA Coordinator..... 9
- Department ADA Liaisons..... 9

NOTICE OF THE ADA’S PROVISIONS..... 9

- Target Audience..... 9
- The Notice..... 10
- How and Where to Provide the Notice ..... 10
  - Ways to Provide Notice to Interested Persons..... 10
  - Alternative Formats ..... 11

GRIEVANCE POLICY & PROCEDURE..... 11

- Background..... 11
- Policy on Complaints..... 11

SELF ASSESSMENT ..... 12

- Summary..... 12
- Inventory Plan..... 13
- GIS Inventory & Priorities ..... 13
- Field Inventory ..... 13
- Prioritization for ADA Deficiency Corrections ..... 14
  - Ramp Condition ..... 14
  - Pedestrian Volume..... 14
  - Pedestrian Use of the Adjacent Property ..... 15
  - Use by Persons Needing Accommodation..... 15
- Correction Program and Schedule..... 16



USDOJ Recognized Limitations .....	16
USDOJ Standards Changes .....	16
Curb Ramps .....	17
Pedestrian Push Buttons .....	17
Obstructions in the Right-of-Way .....	17
Puget Sound Energy .....	18
Disrepair and Gaps in the Sidewalk System .....	18
Other Obstructions .....	18
Milestones .....	19
Budgeting and Implementation .....	19
Community Involvement .....	19

DRAFT



APPENDIX A.....i  
    ADA Title II Transition Plan Process .....i  
APPENDIX B .....ii  
    Compliance Structure ..... ii  
APPENDIX C.....iii  
    Job Description for the City of Bremerton ADA Coordinator .....iii  
        Duties of an ADA Coordinator .....iii  
        Preferred Skills: .....iv  
        Preferred Experience: .....iv  
    Job Description for the City of Bremerton Department ADA Liaison.....iv  
        Duties of a Department ADA Liaison .....iv  
        Preferred Skills: .....v  
        Preferred Experience: .....v  
APPENDIX D.....vi  
    City of Bremerton Notice Under the Americans with Disabilities Act.....vi  
APPENDIX E .....vii  
    City of Bremerton Grievance Procedure .....vii  
APPENDIX F .....ix  
    ADA Grievance Form.....ix  
APPENDIX G.....xi  
    Inventory Zones .....xi  
APPENDIX H.....xii  
    GIS Map of Inventoried Ramps as of September 19, 2016 .....xii  
APPENDIX I .....xiii  
    Property Classification Codes .....xiii



## INTRODUCTION

The City of Bremerton (City) Transition Plan (the Plan) required by the Americans with Disabilities Act (ADA) of 1990 is intended to guide the City's efforts to provide an accessible transportation system program within the City. The purpose of the Plan is to identify deficiencies in City policies, procedures, and physical assets, and to provide a path to correction of those deficiencies. The plan also provides guidance for removal of accessibility barriers. The Plan outlines progress to date and identifies steps necessary to bring the City program into compliance with ADA regulations. The Plan is intended to be a living document that will be updated regularly to track ongoing achievements toward compliance.

The minimum requirement for the scope of the ADA Transition Plan is accessibility of all curb ramps and ancillary facilities (pedestrian push buttons and pedestrian signals) within the right-of-way. In order to efficiently implement the Plan, the scope of this initial Plan is limited to addressing these facilities. That said, the City acknowledges that other impediments to accessibility exist along the pedestrian access routes (signs and power poles in the sidewalks, driveway approaches, disrepair, etc.,) and that these issues must also be addressed for a functional and accessible pedestrian system. The City intends to address these other issues with future updates to the Plan.

Other City ADA compliance responsibilities related to buildings, programs and employment are also outside the scope of this Plan.

### Regulatory Framework and Guidance Documents

#### ***Section 504 of the Rehabilitation Act of 1973***

Section 504 of the Rehabilitation Act of 1973 prohibits discrimination on the basis of disability by any program or activity receiving federal financial assistance. Discrimination may consist of exclusion from participation in or denial of the benefits of programs and activities operated by the City.

#### ***Title II of the Americans with Disabilities Act (ADA) of 1990***

The ADA expands on the foundation laid by Section 504 by prohibiting discrimination on the basis of disability by public entities regardless of whether they receive federal financial assistance. The Act is divided into five titles describing requirements relating to (I) employment, (II) state and local government services, (III) public accommodations, (IV) telecommunications, and (V) miscellaneous provisions. Title II of the Act applies specifically to state and local government services and the programs and activities they administer, including features built before and after 1990. Titles I, III, IV, and V are not addressed further in the Plan.

The Code of Federal Regulations (CFR) outlines regulations implementing Title II of the ADA, which apply to the City. Table 1.1 summarizes relevant City responsibilities under Title II of the ADA.



**Table 1.1 Summary of City Responsibilities under Title II of the ADA**

Implementing Regulation	Responsibilities
28 CFR 35.105	<p><b>Self-Evaluation</b></p> <ul style="list-style-type: none"> <li>Evaluate current services, policies, and practices and make any necessary modifications to meet ADA requirements</li> <li>Provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the self-evaluation process by submitting comments</li> <li>Maintain a list of interested persons consulted, a description of areas examined and any problems identified, and a description of any modifications</li> </ul>
28 CFR 35.106	<p><b>Notice</b></p> <ul style="list-style-type: none"> <li>Make ADA information available to the public regarding applicability to City services, programs, and activities</li> </ul>
28 CFR 35.107	<p><b>Responsible Employee /Grievance Procedures</b></p> <ul style="list-style-type: none"> <li>Designate a responsible employee to coordinate ADA efforts (referred to in this Plan as the ADA Coordinator); provide the ADA coordinator's name, office address, and telephone number</li> <li>Adopt and publish grievance procedures providing for prompt and equitable resolution of complaints</li> </ul>
28 CFR 35.130; 28 CFR 35.149	<p><b>General Prohibitions Against Discrimination</b></p> <ul style="list-style-type: none"> <li>Do not exclude disabled persons from participation in or deny benefits of City services, programs, or activities</li> <li>Do not discriminate on the basis of disability</li> </ul>
28 CFR 35.133	<p><b>Maintenance</b></p> <ul style="list-style-type: none"> <li>Maintain facilities and equipment required to be accessible to persons with disabilities in operable working condition</li> </ul>
28 CFR 35.150	<p><b>Existing Facilities</b></p> <ul style="list-style-type: none"> <li>Operate each service, program, or activity in a manner accessible to and usable by individuals with disabilities</li> <li>Alter existing facilities or construct new facilities as necessary to comply with ADA requirements</li> <li>Develop a transition plan outlining steps necessary to complete structural changes to facilities</li> </ul>
28 CFR 35.151	<p><b>New Construction and Alterations</b></p> <ul style="list-style-type: none"> <li>Design, construct, and alter public facilities in a manner readily accessible to and usable by individuals with disabilities, unless structurally impracticable</li> <li>Provide curb ramps or other sloped areas at any intersection having curbs or other barriers to entry from a street level pedestrian walkway</li> </ul>
28 CFR 35.160; 28 CFR 35.161	<p><b>Communications / Telecommunications</b></p> <ul style="list-style-type: none"> <li>Ensure effective communications with disabled persons</li> <li>Provide appropriate auxiliary aids and services to afford disabled individuals an equal opportunity to participate in and enjoy the benefits of City services, programs, and activities</li> </ul>
28 CFR 35.163	<p><b>Information and Signage</b></p> <ul style="list-style-type: none"> <li>Provide information about the existence and location of accessible services, activities, and facilities</li> </ul>

**Note:** Additional responsibilities detailed in 28 CFR Section 35 (e.g., related to employment discrimination) are not discussed in the Plan.



## *Transition Plan Requirements*

Public entities employing 50 or more persons must develop a document called a transition plan outlining the steps necessary to complete any structural changes (i.e., changes to physical assets) to achieve program compliance.

At a minimum, the plan must meet the requirements stated in 28 CFR 35.150(d)(3) as follows:

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

As part of the transition plan, public entities responsible for streets, roads, or walkways must include a schedule for providing curb ramps or other sloped areas where pedestrian walks cross curbs, giving priority to walkways serving state and local government offices, transportation centers, places of public accommodation, and employers, followed by walkways serving other areas (23 CFR 35.150(d)(2)).

The Plan addresses minimum plan requirements relating to physical assets, including facilities and rights-of-way owned and maintained by the City. Rights-of-way features include elements such as curb ramps, sidewalks, crosswalks, median crossings, and pedestrian activated signal systems. In addition to minimum requirements, the Plan addresses other elements outlined in Title II of the ADA related to administration, communications, and maintenance.

Public entities must provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the development of the transition plan by submitting comments. A copy of the transition plan must be made available for public inspection (28 CFR 35.150(d)(1)).

## *Best Management Practices*

The 2009 National Cooperative Highway Research Program (NCHRP) Guide to Best Management Practices was created to assist agencies in the transition plan development process and ensure successful practices are recognized and shared. The guide outlines steps necessary for ADA compliance, identifies planning challenges, and describes best practices relating to program administration, self-evaluation tasks, public involvement, and plan implementation. This guidance document was consulted during preparation of the Plan.

## **TRANSITION PLAN DEVELOPMENT PROCESS**

The City has been upgrading pedestrian facilities as a part of its ongoing efforts since before 1990, and continues a program started several years ago to address retrofits. In an effort to formalize its program, the City initiated development of the Plan in February 2016. As part of this effort, the City contracted with the consulting firm King Technologies, PLLC to evaluate current City policies and procedures relative to ADA requirements; review current federal



standards and develop an approach to adopting appropriate standards; develop an approach for completion of the self-assessment, a prioritization process, barrier removal methods, and implementation schedules; and provide findings and recommendations. The Plan documents the results of this effort. Appendix A outlines the process and timelines.

### ADA Advisory Committee

The City established an ADA Advisory Committee in February 2012. The committee has operated in an ad hoc fashion, chaired by City Engineering Division staff. Attendance at the quarterly meetings has generally consisted of City Public Works, Parks and Engineering Staff, Kitsap Transit Staff, and two disabled representatives of the community. Since the first quarter of 2015 the City Engineer has chaired the committee meetings.

Throughout 2016, the development of the ADA Transition Plan was a major focus at the various quarterly meetings, with the ADA Committee being presented, and commenting on the various components of the Plan as it was being developed. With the adoption of the Plan in 2017 the City Engineer will be formally appointed as the City's ADA Coordinator, and his role in chairing the ADA Committee meetings is intended to continue.

## PROGRAM ADMINISTRATION

### The ADA Coordinator<sup>1</sup>

The ADA regulations require state and local governments with 50 or more employees to designate an employee responsible for coordinating compliance with ADA requirements. Having an ADA Coordinator provides a specific contact person with knowledge and information about the ADA so that questions can be answered efficiently and consistently. The ADA Coordinator for the City of Bremerton is the main contact when someone wishes to request an auxiliary aid or service for effective communication or access.

For the public, having an ADA Coordinator makes it easy to identify someone within the agency to help them with questions and concerns about disability discrimination. It avoids multiple answers, potentially conflicting answers, and allows the agency to not only consistently comply with the ADA, but also provide consistent responses and direction throughout the agency. A knowledgeable ADA Coordinator will be able to efficiently assist people with disabilities with their questions.

For the staff, an ADA Coordinator provides a sound resource to assist with compliance and impartiality in responding to requests and complaints. She or he will also be responsible for coordinating responses to requests, and for quasi independently investigating complaints.

The general compliance structure is shown in Appendix B

---

<sup>1</sup> This section is adapted from the ADA.Gov toolkit, at <http://www.ada.gov/pcatoolkit/chap2toolkit.htm>



## *An Effective ADA Coordinator*

Qualifications that help an ADA Coordinator to be effective:

- familiarity with the state or local government's structure, activities, and employees
- knowledge of the ADA and other laws addressing the rights of people with disabilities, including Section 504 of the Rehabilitation Act, 29 U.S.C. § 794 and 49.60 R.C.W. Discrimination-Human Rights Commission
- experience with people with a broad range of disabilities
- knowledge of various alternative formats and alternative technologies that enable people with disabilities to communicate, participate, and perform tasks
- ability to work cooperatively with the local government and people with disabilities
- familiarity with any local disability advocacy groups or other disability groups
- skills and training in negotiation and mediation
- organizational and analytical skills

## Department ADA Liaisons

In addition, as each Department holds specific independent responsibilities and budget authority, each Department Head will designate an ADA Liaison responsible for keeping that Department advised of ADA requirements and changes, and for coordinating responses to ADA requests affecting that Department.

Responsibilities of the ADA Coordinator and Department ADA Liaison appear in Appendix C.

## **NOTICE OF THE ADA'S PROVISIONS**

An ADA administrative requirement is providing public notice<sup>2</sup> about the ADA to potential recipients of City programs. Every agency falls under this requirement. And it is more complex than simply providing an advertisement with employment solicitations or Public Service Announcements. There are three main considerations for providing notice:

1. Who is the target audience for the ADA notice?
2. What information shall the notice include?
3. Where and how should the notice be provided?

## Target Audience

The target audience for public notice includes applicants, beneficiaries, and other people interested in the state or local government's programs, activities, or services. The audience is expansive, and includes everyone who interacts – or would potentially interact – with the City and any of its Departments.

---

<sup>2</sup> 28 C.F.R § 35.106.



## *Examples of the Target Audience for the ADA Notice*

- a recipient of social services, food stamps, or financial assistance provided by or through the City
- an applicant for a public library card
- a person who uses the City parks or plays at Gold Mountain Golf Course
- a child who wants to swim at the Glenn Jarstad Aquatic Center
- a grieving mother who wants to attend her daughter's funeral at Ivy Green Cemetery
- a grandmother attending her grandchild's high school graduation in a city park
- a member of a citizen's advisory committee, perhaps the ADA Advisory Committee
- a recipient of a grant through the City from Washington State
- a citizen who wants to participate in a City Council meeting

## The Notice

The notice is required to include relevant information regarding Title II of the ADA<sup>3</sup>, the regulations that apply ADA to States and local governments, and how it applies to the programs, services, and activities of the City.

The notice in Appendix D is based on the Department of Justice model. A one-page document in a standard font, it includes brief statements about employment, effective communication, making reasonable modifications to policies and programs, not placing surcharges on modifications or auxiliary aids and services, and filing complaints.

## How and Where to Provide the Notice

This is perhaps the most challenging aspect of the notice requirement, in that it is not a one-time requirement. Rather the City must provide notice on an ongoing basis such that those affected have a reasonable opportunity to obtain the information in it, even though they may only be a casual user of City services and buildings. The City should provide the information on an ongoing basis.

It is the City's obligation to determine the most effective way of providing notice to the public about their rights and the City's responsibilities under the ADA. Venues to provide notice would include the radio, local newspapers, television, or City utility or event mailings. The notice should be re-published and re-broadcast periodically.

## *Ways to Provide Notice to Interested Persons*

- Include the notice with **City job applications**
- Publish the notice periodically in **The Kitsap Sun**
- Broadcast the notice in public service announcements on **BKAT (Bremerton Kitsap Access Television)**
- Publish the notice on the **City's website**
- Post the notice **at all City buildings accessible to the public**
- Publish the notice as a **legal notice** in the City's official newspaper

---

<sup>3</sup> [https://www.ada.gov/ada\\_title\\_II.htm](https://www.ada.gov/ada_title_II.htm)



The information must be presented so that it is accessible to all. Therefore, it must also be made available in alternative formats if requested.

### *Alternative Formats*

- Audio tape or other recordings
- Radio announcements
- Large print notice
- Braille notice
- Use of a **qualified sign language interpreter** at meetings
- Open or closed-captioned public service announcements on television
- ASCII, HTML, or word processing format on a computer diskette or CD
- HTML format on an accessible website
- Advertisements in publications with **large print versions**

All of these alternatives should be considered and provided if requested. Any use of social media by the City should have a link to the notice as well. The ADA Coordinator should work closely with the Mayor and Department ADA Liaisons to provide an appropriate level of notice on an ongoing basis, and to ensure that new programs or publications incorporate the notice on a timely basis.

## GRIEVANCE POLICY & PROCEDURE

### Background

The City is required to adopt and publish grievance procedures providing for prompt and equitable resolution of complaints alleging any action that would be prohibited by the ADA.

The grievance procedure includes<sup>4</sup>:

- a description of how and where a complaint under Title II may be filed with the City;
- if a written complaint is required, a statement notifying potential complainants that alternative means of filing will be available to people with disabilities who require such an alternative;
- a description of the time frames and processes to be followed by the complainant and the City;
- information on how to appeal an adverse decision; and
- a statement of how long complaint files will be retained.

A procedure was first adopted by the City under Resolution 2409, September 30, 1992. The following is an update of that procedure.

### Policy on Complaints

Input, concerns or requests for accommodation can be provided directly to the City of Bremerton by accessing the City of Bremerton web site at [www.ci.bremerton.wa.us](http://www.ci.bremerton.wa.us), and

---

<sup>4</sup> <http://nwadacenter.org/toolkit/grievance-procedure>



following the links to fill out and submit the electronic form provided. Public requests made through this procedure will be reviewed and the facility in question may be moved to a higher priority for improvement. Priorities may change based upon citizen requests, additional input and changing conditions. Results of this process will be communicated directly to the individual by phone or e-mail. Individuals may also choose to call the responsible City office directly.

The City of Bremerton also has a formal grievance or complaint procedure which may be used if the issue has not been resolved by using the above procedure. This procedure is included in Appendix E. In addition, a copy of the grievance form is included in Appendix F, and may also be accessed online. A copy of the grievance form may also be obtained at the City of Bremerton's ADA Coordinator or Human Resource offices.

Complaints may be filed by any person who believes that he or she has been excluded from participation in, been denied the benefits of, or otherwise subjected to discrimination under any City of Bremerton service, program or activity, or access to facilities and believes the discrimination is based upon disability.

Any individual, groups of individuals or entity that believes they have been discriminated against on the basis of disability or faced unaccommodated barriers to access as defined by the ADA may file a complaint. The complaint must be in writing and contain the following information: 1) Name; 2) Address; 3) Phone number of complainant; 4) Location of alleged discrimination or inaccessible barrier and date; and 5) Description of the problem. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint will be made available for persons with disabilities upon request.

### SELF ASSESSMENT

#### Summary

The City recognizes the requirement to provide an inventory and assessment (self-evaluation) within its transition plan. The purpose of the self-evaluation is to provide a means of identifying deficiencies in its physical pedestrian facilities, to develop an inventory of needed corrections and updates, and to establish a schedule for the corrections.

The City also recognizes from a high level staff overview of its physical plant that such an inventory, and certainly the corrections, is beyond the financial ability of the City within its current and projected budgets for years to come. In an effort to address those deficiencies on an ongoing basis, and over time to ultimately remove those deficiencies, the following Plan was developed such that a high level inventory may be completed relatively quickly, on a priority basis. As the inventory is completed, a priority system for corrections is also planned to be implemented. Those initial priorities will be updated as the inventory is completed, and updated on an annual basis in order to attack and eventually remove deficiencies in the system.

The City recognizes that a plan that is not updated and revised over time to reflect exigencies that will emerge is not a plan. In so doing, not only will the formal inventory and annual



updates be reviewed, but those priorities may also be affected by Citizen input or complaints over time, and adjusted to reflect current needs.

### Inventory Plan

The inventory is limited to improvements in the right-of-way. In order to complete the inventory in the most expeditious manner possible, the City was broken into “Inventory Zones” – areas of the City where pedestrian traffic may reasonably be expected to be higher, thus most likely to have the greatest ADA needs. These areas will be the first priority, with the inventory of lower volume areas to follow. The zones, in priority order are:

1. Downtown – clearly the highest auto and pedestrian use, with the greatest number of ADA population users, for business and shopping.
2. Manette – the north end of town across the Manette bridge, with the greatest number of medical buildings, including the Harrison Medical Center.
3. West Bremerton – south and west of downtown.

The zones are displayed on Appendix G.

Inventory of public buildings and parks will be considered outside this Plan.

### GIS Inventory & Priorities

The City is completing an inventory of its curb ramps using its GIS system and aerial mapping; this work is expected to be complete by the end of 2016. The inventory classifies ramps into three categories; “Red” is used where either no ramp exists or the ramp is obviously deficient and unusable; “Yellow” is used where ramps exist that were constructed to old standards but appear to be useable; and “Green” ramps are relatively new and appear to be compliant. The City intends to use this information initially to assist in developing zones, recognizing that ramps were most often constructed in higher use areas over time.

As there are no standardized means for determining levels of pedestrian traffic, and physical counts require significant resources, the City considered options for a substitute methodology to aid in determining areas of higher pedestrian use, thus higher ADA population use. The most reasonable method identified is street classification. Those classifications reflect the overall use of each street. As such, they also reflect the higher use pedestrian areas.

The ADA Committee reviewed and recommended approval of the zones. The zones will be used in listed order to complete a more detailed inventory, filling in any missed locations or needed corrections.

### Field Inventory

To supplement regular City staff, summer interns have been, and will be, hired to complete the “leg work” required to cover the entire City. The goal of the field inventory is to identify and input into the City’s GIS database (Chart) impediments to accessibility city-wide. Specifically, the field inventory will identify and chart existing Pedestrian Push Buttons at signalized intersections, identify and chart driveway approaches, identify and chart obstructions (power poles, street signs, guy wires, etc.,) that reduce the Pedestrian Access Route below the



standard, and finally to identify and chart areas of disrepair or areas where the existing sidewalk is either non-existent, or otherwise non-compliant. Staff performing the inventory will be armed with inventory forms on Electronic Tablets to simplify both data collection and assembly, as well as tape measures, smart levels and cameras to record general measurements such as widths and layouts, obstructions and physical condition, and provide a visual of the situation to avoid a future field visit every time a question arises. An assigned Public Works staff member will oversee that inventory, providing day to day direction as well as having responsibility for creating the inventory. The City anticipates completing the field inventory by the end of 2019.

It should be noted that in performing the field inventory, the City does not intend to field measure the cross-slopes of all existing sidewalks on a blanket basis, but instead will identify those where significant issues obviously exist, and work to provide new sidewalks constructed in compliance with current criteria. Areas identified with obvious excessive cross slopes will be field measured and charted and noted during the field inspection, or where complaints have been received.

The inventory of the curb ramps to be completed is adequate to identify gaps in the system (“Red” ramps), non-compliant but apparently useable locations (“Yellow” ramps), and ramps that are in compliance with current ramp design criteria (“Green”; cross-slopes, landing widths, etc.) It is the City’s intent to use the inventory data, along with public and ADA Committee input to prioritize improvements with new ramps to be installed at all “Red” and “Yellow” locations. The City may elect to retain “Yellow” ramps that are close to standards and otherwise in compliance. A determination of the parameters will be developed in the implementation phase.

### Prioritization for ADA Deficiency Corrections

One of the significant products of the ADA Transition Plan is the prioritized list of corrections, or the Capital Improvement Plan/CIP. Given the large number of non-compliant or non-existent ADA ramps, careful consideration has been given to developing a quantitative approach to establishing the prioritized list. Four factors have been identified to consider for each ramp location requiring correction; ramp condition, pedestrian volume (the street classification surrogate values), pedestrian usage of the adjacent property, and usage of the ramp by persons needing accommodation. For efficiency, existing data was used for the evaluations, with weight given to areas of higher importance. A discussion of the ranking, weight and evaluation method, and how projects are identified annually for construction follows:

#### ***Ramp Condition***

All ramps and ramp locations in the City have been coded Green, Yellow, or Red as discussed above. For the CIP, all Red coded ramps precede Yellow ramps. Since Green coded ramps are fully compliant they are not included in the list.

#### ***Pedestrian Volume***

The City does not have pedestrian count data for its sidewalks, and so in order to evaluate pedestrian volumes, road classification has been used as a surrogate. For the evaluation,



pedestrian volumes were presumed to be highest for Arterial roads, lowest for Residential roads, with pedestrian usage of Collector roads presumed to be in the median. The evaluation ranks each ramp by the road classification of both roads in the intersection where it resides; the intersection types and relative rank of pedestrian usage in the evaluation is as follows:

- ✓ Intersection of Residential and Residential (e.g. Chester Avenue & 9<sup>th</sup> Street) – Lowest Presumed Pedestrian Usage
- ✓ Intersection of Residential and Collector (e.g. 9<sup>th</sup> Street & High Avenue)
- ✓ Intersection of Residential and Arterial (e.g. Chester Avenue & 11<sup>th</sup> Street)
- ✓ Intersection of Collector and Collector (e.g. High Avenue & 13<sup>th</sup> Street)
- ✓ Intersection of Collector and Arterial (e.g. High Avenue & 11<sup>th</sup> Street)
- ✓ Intersection of Arterial and Arterial (e.g. 11<sup>th</sup> Street & Warren Avenue) – Highest Presumed Pedestrian Usage

### ***Pedestrian Use of the Adjacent Property***

All properties have a Property Class Code associated with them that is established by Kitsap County. To associate a value to the relative pedestrian importance of properties, each of the Property Class Codes were evaluated and identified as having an importance value of Low, Medium or High. A weight factor was then identified for each the Low, Medium and High values and each ramp received this value for property that it abuts. The Property Classification Codes and associated ranking is included in Appendix I.

The location of ramps relative to transit facilities was also included in the evaluation. Values were associated with ramps that are on streets that are on bus routes, within one block of bus routes, and within 1,200-ft of the Ferry Terminal.

### ***Use by Persons Needing Accommodation***

The above factors provide the methodology that was used to develop the prioritized CIP list; again, the goal was to develop the list efficiently and quantitatively. Since the City's implementation will occur over a number of years, and to ensure the implementation occurs first in the areas of greatest need, the City will consider complaints along with input from the ADA Committee each year when developing its annual construction program. It is expected that through this review, reconstruction of ADA ramps that are lower on the prioritized list may occur before higher ranked ramps.

### ***Other Impediments Affecting Accessibility of the Pedestrian Access Route***

As previously stated, this ADA Transition Plan focuses on curb ramps and appurtenances, but does not address other impediments such as obstructions in the sidewalk or disrepair. It is the intent of the City to identify a programmatic approach for prioritizing the elimination of these impediments in future updates to the Plan.



## Correction Program and Schedule

### *USDOJ Recognized Limitations*

When streets and roads are newly built or altered, they must have ramps wherever there are curbs or other barriers to entry from a pedestrian walkway. Likewise, when new sidewalks or walkways are built or altered, they must contain curb ramps, blended transitions or ramps, wherever they intersect with streets or roads. While resurfacing a street or sidewalk is considered an alteration for these purposes, filling in potholes alone will not trigger the alterations requirements. At existing roads and sidewalks that have not been altered, however, city governments may choose to construct curb ramps at every point where a pedestrian walkway intersects a curb, but they are not necessarily required to do so. Alternative routes to buildings that make use of existing curb ramps may be acceptable where people with disabilities must only travel a marginally longer route.

The City also plans to establish a procedure for installing curb ramps upon request in both residential and nonresidential areas frequented by individuals with disabilities.<sup>5</sup> In implementing a curb cut transition plan for existing sidewalks, the actual number of curb cuts installed in any given year may be limited by the fundamental alteration and undue burden limitations described below.

### *USDOJ Standards Changes*

It is important to note that there are limitations set by the Department of Justice regulations to the requirements for correction of existing facilities. These limitations, excerpted below, recognize that the regulations and standards change periodically, and permit more recent updates to remain even though they may not comply with the current standards.

#### Title II Regulations

Revised Final Title II Regulation with Integrated Text

**Part 35 Nondiscrimination on the Basis of Disability in State and Local Government Services (as amended by the final rule published on September 15, 2010)**

**Authority: 5 U.S.C. 301; 28 U.S.C. 509, 510; 42 U.S.C. 12134.**

#### Subpart D—Program Accessibility

##### **§ 35.150 Existing facilities**

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

---

<sup>5</sup> 28 C.F.R. §§ 35.150(d)(2)



Further, Sec. 35.151(a)(2) provides that full compliance with the requirements of this section is not required where an entity can demonstrate that it is structurally impracticable to meet the requirements. It is however rather narrow in scope in that full compliance will be considered structurally impracticable only in those rare circumstances when the unique characteristics of terrain prevent the incorporation of accessibility features.

In addition, while the path of travel requirements and the exemption relating to barrier removal are now included in the regulation, the specific requirements are limited to the extent that the cost and scope of alterations to the path of travel are disproportionate to the cost of the overall alteration. The exemption may generally be applied when the cost exceeds 20 percent of the cost of the alteration to the primary function area. Caution should be used in determining the primary function area for the purpose of this exemption.

These limitations and exemptions are considered in the City of Bremerton's policies and programs.

### **Curb Ramps**

Existing pedestrian facilities in the public right-of-way must be made accessible to individuals with disabilities. Necessary curb ramp improvements identified in the self-evaluation will be addressed with scheduled projects as well as separate projects to specifically address pedestrian accessibility. The prioritized list of deficiencies identified in the self-evaluation will be used to prioritize and develop budgets for such improvements over time. A GIS map of the ramps inventoried as of September 19, 2016, coded by color, is shown in Appendix H.

### **Pedestrian Push Buttons**

Title II of the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act specifically requires that signals be made accessible to pedestrians with vision disabilities. Currently, there is no standard as to when existing pedestrian push buttons need to be upgraded to Accessible Pedestrian Signal push buttons. Once finalized and adopted by the Department of Justice and the U.S. Department of Transportation, the Public Rights-of-Way Accessibility Guidelines (PROWAG) will be the standard for public right-of-way facilities. Until that time, FHWA requires State DOTs and local agencies to develop and follow a reasonable and consistent policy for addressing accessible pedestrian signals and push buttons in the public right-of-way.

It is the City of Bremerton's APS push button policy to include APS push buttons on all new signals, and the inventory plan will prioritize existing signals for upgrades.

### **Obstructions in the Right-of-Way**

The City of Bremerton, home to the Puget Sound Naval Shipyard & Intermediate Maintenance Facility, was founded in 1891 by German immigrant William Bremer. The history of Bremerton and that of the navy base have always been inextricably entwined, with the fortunes of the former highly dependent on the activities of the latter. Bremerton made it through the ups and downs of a military-dominated economy for most of the twentieth century, but barely survived the 1980s when almost every major business enterprise moved to Silverdale, and significant military spending



was diverted to the new Trident submarine base at Bangor. The City managed to hold on through the 1980s and 1990s, and in recent years has taken serious steps to reinvent itself and revitalize its economy. Although the 2010 world economic slowdown has hampered these efforts, some activity at the Shipyard has continued and increased since, and Bremerton has plans in place to continue its renaissance as financial conditions allow.

As a part of that history, the development of sidewalks, shared use paths and overall pedestrian facilities occurred as each section of the City was constructed or reconstructed over the past 120 plus years. Those facilities often reflect the standards at the time they were constructed. As a result, there are many instances of facilities that do not meet current ADA standards.

As noted above the City desires to upgrade those facilities, and remove obstructions that now exist. Such obstructions range from no sidewalks, to narrow sidewalks, to utility pole incursions, damaged sidewalks and ramps, fire hydrants and other street fixtures, signs, and traffic signals. The City is actively considering removals through its agreement with Puget Power and other obstructions as each budget cycle proceeds. The intent is to remove obstructions as rapidly as budget and other considerations allow.

### ***Puget Sound Energy***

In an effort to address one of the more challenging obstructions, utility poles, the City developed an informal agreement with Puget Sound Energy (PSE) to identify and remove or relocate poles that obstruct those paths. In the majority of cases, it means relocation. Under the agreement, the City is to acquire easements or rights-of-way at its expense and PSE agreed to relocate the offending poles at their expense. A concerted effort has continued for the past several years to move forward on that agreement, and some relocations have occurred. But the difficulty of acquiring rights-of-way using federal acquisition standards (necessary to protect its ability to use federal funds, a key transportation funding source), coupled with the cost of those rights-of-way has proven a difficult challenge to overcome.

However, that effort is continuing and the City intends to develop a more specific acquisition plan by the end of 2018 to better address this particular challenge.

### ***Disrepair and Gaps in the Sidewalk System***

While the legal responsibility for sidewalks is typically that of the adjacent landowner, as in most cities across the country, that responsibility has proven difficult to enforce, particularly in challenging economic times. The City intends to develop a policy and procedure to address correction of broken sidewalks, along with developing a prioritized list of gaps in the pedestrian system, following completion of the inventory, and by the end of 2018.

### ***Other Obstructions***

Other obstructions are planned to be addressed in the correction of ramps, when signs are upgraded or replaced, and as a part of street improvements as they occur. Priorities for such improvements include consideration of the pedestrian facilities in the project.



## Milestones

To measure progress in its Plan, the City has established the following milestones. Each year these milestones will be reviewed and updated as a part of the budgeting process.

1. Completion of Initial Inventory – December 2019
2. Inventory Update – Ongoing
3. Prioritization Update – December Annually
4. ADA Budget Elements – December Annually
5. Five Year Inventory Review – July 2024
6. Ten Year Inventory Review – July 2029
7. Transition Plan Review and Update – December 2029

## Budgeting and Implementation

This Plan sets a goal that the City intends to pursue in its annual budgeting process of 5% of the Street O&M Budget for corrections, with a \$100,000 minimum expenditure. Each annual budget will begin with that assumption.

The City is currently budgeting all new projects for appropriate standards for pedestrian facilities. It has also accomplished upgrades to facilities specifically identified by the ADA Committee over the past several years. The newly created inventory will be the foundation for annual budgets to address identified needs on a priority basis.

## **COMMUNITY INVOLVEMENT**

During development of the Plan, the ADA Advisory Committee was engaged through each step of the process, from the background report that identified the specific needs leading to the Plan, through identification of the prioritization methodology.

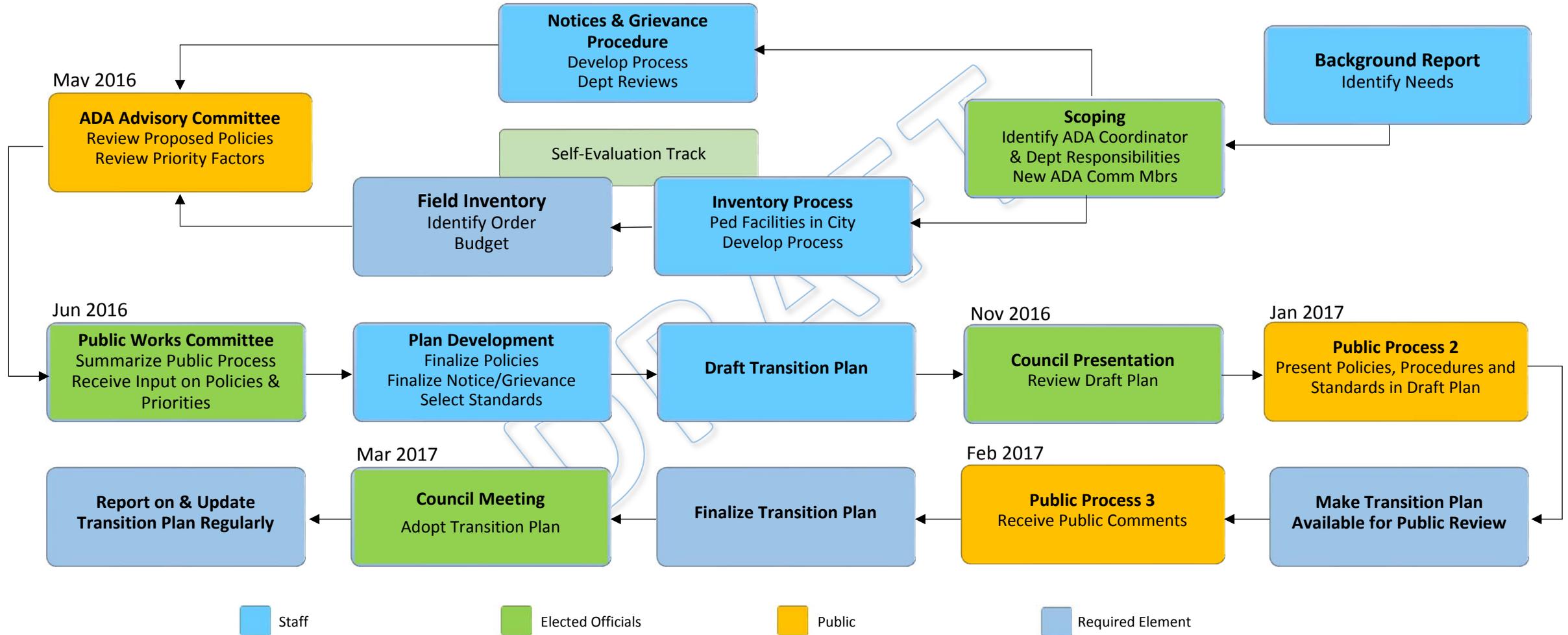
In addition to the representation and engagement of the ADA Advisory Committee, the City provided an open house session for public presentation and review of the Draft Plan, followed by an additional opportunity to provide additional feedback before the Plan was submitted to the Council in public session for their review and approval.

Public meetings and public involvement following adoption of the ADA Transition Plan include the quarterly ADA Advisory Committee Meetings, along with the Annual reports and the Five and Ten-year reviews that will be presented to the City Council. As previously stated, the City intends to advertise these meetings widely to encourage attendance and promote involvement to ensure the ADA Transition to compliant facilities proceeds in an efficient manner to best serve the ADA community to the greatest extent possible.



APPENDIX A

ADA Title II Transition Plan Process





APPENDIX B

Compliance Structure





### APPENDIX C

#### The City of Bremerton ADA Coordinator<sup>6</sup>

The ADA Coordinator is responsible for coordinating the efforts of the City program to comply with Title II and investigating any complaints that the City has violated Title II.

#### *Duties of an ADA Coordinator*

- Maintain current knowledge of the laws and regulations of the Federal Americans with Disabilities Act<sup>7</sup>.
- Maintain current knowledge of laws and regulations for access and accommodation by the State of Washington.
- Work with the City Attorney for interpretation and application of federal and state laws regarding equal access for people with disabilities.
- Coordinate with the City Department's ADA compliance personnel to keep them current on requirements and changes; however, each Department is responsible to ensure their programs and facilities are ADA compliant. For example, the Parks and Recreation Department is responsible to ensure their programs are accessible, and to coordinate with the Legal Department to resolve any issues, and likewise the Human Resources Division will coordinate with the Legal Department on employment accessibility issues.
- Monitor and ensure the City's compliance with state and federal disability laws.
- Monitor the reduction of architectural barriers for individuals with disabilities.
- Develop and maintain relationships with local disability advocacy groups and the local disability community.
- Monitor and improve the physical, electronic and programmatic access to the City and its services.
- Provide ongoing support and guidance to City staff regarding issues relating to disabilities and accommodation.
- Advise and coordinate with Department heads for improvement of provision of accommodation, staff training and other improvements.
- Receive and process accommodation requests.
- Conduct and/or coordinate investigations of Section 504/ADA complaints in accordance with the City's discrimination complaint procedures. This may involve interviewing complainants, respondents, and witnesses; reviewing documents and other relevant materials; and researching legal standards and requirements relevant to the complaint.
  - If the ADA Coordinator has identified a conflict of interest with respect to a particular complaint, the Coordinator should recommend that the City hire a neutral outside investigator to investigate a particular complaint.

---

<sup>6</sup> Adapted from The Washington Courts Model description for courts. <http://www.courts.wa.gov/>

<sup>7</sup> [http://www.ada.gov/2010\\_regs.htm](http://www.ada.gov/2010_regs.htm)



## APPENDICES

- Upon completion of the investigation, provide the Mayor with a written report of the complaint and the results of the investigation in time for the Mayor to respond to the complainant within 30 days after the City initially received the complaint.
- Organize and maintain records of all Section 504/ADA and disability discrimination complaints filed, including all formal and informal complaints. At least annually, review complaint files to ensure that the City's complaint procedures and timelines are consistently being followed, and to identify any patterns and repeat offenders.
- Facilitate an annual report to the City Council on progress.
- Provide ongoing coordination and support with Department designated ADA Liaisons.

### *Preferred Skills:*

- Familiarity with City structure, programs and employees.
- Ability to learn about ADA and other laws addressing the rights of people with disabilities, such as Section 504 of the Rehabilitation Act, 29 U.S.C. § 794 and 49.60 R.C.W.
- Ability to work cooperatively with City employees and people with disabilities.
- Familiarity with local disability groups.
- Organizational and analytical skills.

### *Preferred Experience:*

- Experience with people with a broad range of disabilities.

### The City of Bremerton Department ADA Liaison

The Department ADA Liaison is responsible to advise their Department Head on accessibility for the programs and facilities or buildings it manages, and to assist the ADA Coordinator in the efforts of the City program to comply with Title II and investigate any complaints that the Department has violated Title II.

### *Duties of a Department ADA Liaison*

Reporting to the Department Head, the Department ADA Liaison is responsible to:

- Identify impediments to accessibility in its programs and facilities.
- Work with the ADA Coordinator for application of the laws and regulations of the Federal Americans with Disabilities Act<sup>8</sup> and the laws and regulations for access and accommodation by the State of Washington within the Department.
- Monitor the reduction of architectural barriers for individuals with disabilities for Department facilities, and advise the Department Head of potential deficiencies.
- Monitor and improve the physical, electronic and programmatic access to the Department and its services, and advise the Department Head of potential deficiencies.

---

<sup>8</sup> [http://www.ada.gov/2010\\_regs.htm](http://www.ada.gov/2010_regs.htm)



## APPENDICES

- Liaise between the ADA Coordinator and Department staff regarding issues relating to disabilities and accommodation.
- Coordinate accommodation requests with the ADA Coordinator and Department Head.
- Work with the Department Head and staff to provide relevant information to the ADA Coordinator for any investigations of complaints.
- Facilitate records of responses to ADA complaints.

### *Preferred Skills:*

- Strong organizational, communication and interpersonal skills.
- Self-directed, detailed-minded problem solver.
- Familiarity with Department structure, programs and employees.
- Ability to learn about ADA and other laws addressing the rights of people with disabilities, such as Section 504 of the Rehabilitation Act, 29 U.S.C. § 794 and Chapter 49.60 R.C.W.
- Ability to interpret data.
- Ability to speak effectively before groups of citizens and staff.
- Ability to work cooperatively with City employees and people with disabilities.

### *Preferred Experience:*

- Experience with people with disabilities.

DRAFT



### APPENDIX D

#### City of Bremerton

#### Notice Under the Americans with Disabilities Act

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 ("ADA"), the City of Bremerton ("City") will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

The City does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under Title I of the ADA.

The City will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in the City's programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.

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

The City will make such reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services, and activities. For example, individuals with service animals are welcomed in City offices, even where pets are generally prohibited.

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of the City should contact the ADA Coordinator as soon as possible but no later than 48 hours before the scheduled event.

The City of Bremerton will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications such as retrieving items from locations that are open to the public but are not accessible to persons who use wheelchairs.

Complaints that a program, service, or activity of the City is not accessible to persons with disabilities should be directed to the ADA Coordinator in accordance with the City of Bremerton Grievance Procedure under the Americans with Disabilities Act (Title II). A copy of the procedure may be obtained by contacting the office of the ADA Coordinator:

#### ***ADA Coordinator / City Engineer***

3027 Olympus Drive, Bremerton, WA 98310  
(360) 473-2376



### APPENDIX E

#### City of Bremerton Grievance Procedure

This Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 ("ADA"). It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the City of Bremerton. The City's Personnel Policy governs employment-related complaints of disability discrimination.

1. The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of complainant and location, date, and description of the problem. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint, will be made available for persons with disabilities upon request.
2. The complaint should be submitted by the grievant and/or [his/her] designee as soon as possible but no later than 60 calendar days after the alleged violation to:

ADA Coordinator and City Engineer  
3027 Olympus Drive  
Bremerton, WA 98310

3. Within 30 calendar days after receipt of the complaint, ADA Coordinator or his designee will attempt to meet with the complainant to discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting, ADA Coordinator or his designee will respond in writing, and when requested, in a format accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of the City of Bremerton and offer options for substantive resolution of the complaint.
4. If the response by the ADA Coordinator or his designee does not satisfactorily resolve the issue, the complainant and/or his/her designee may appeal the decision within 15 calendar days after receipt of the response to the City Hearings Examiner or their designee. The response shall be considered received by the complainant on the third business day following the date it is sent to the complainant by the City.
5. A hearing of the grievance shall be scheduled at the next available proceedings of the Hearing Examiner, which will typically be within 30-days of the appeal request by the complainant. Communication with the complainant will be in a format accessible to the complainant.
6. All written complaints received by the ADA Coordinator or his designee, appeals to the City Hearings Examiner or their designee, and responses from these two offices will be retained by the City of Bremerton for at least three years.



### APPENDICES

7. The right of a person to a prompt and equitable resolution of the complaint filed hereunder shall not be impaired by the person's pursuit of other remedies such as the filing of an ADA complaint with the responsible federal department or agency. Use of this grievance procedure does not affect nor does it prevent the pursuit of other remedies.
8. These rules shall be construed to protect the substantive rights of interested persons, to meet appropriate due process standards, and to assure that the City of Bremerton complies with the ADA and implementing regulations.

DRAFT



APPENDIX F

ADA Grievance Form

**COMPLAINT OF ACCESS VIOLATION OR DISCRIMINATION  
ON THE BASIS OF DISABILITY**

The City of Bremerton will make every reasonable effort to ensure that confidentiality is maintained throughout the complaint, investigation, and corrective action process to the extent consistent with the law. 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 \_\_\_\_\_

Authorized representative of individual above (if any)

Name \_\_\_\_\_

Address \_\_\_\_\_

Telephone \_\_\_\_\_

1. Please describe the City of Bremerton’s alleged violation of access requirements, or discriminatory action, in enough detail so that the nature of your grievance can be clearly understood. Add additional 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 Bremerton employee(s) please provide his or her name(s), if known:



## APPENDICES

4. If the grievance involves physical access to a City of Bremerton public facility or building, 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: \_\_\_\_\_

Date: \_\_\_\_\_

Signature of (check one):

- Observer of alleged access violation
- Victim of alleged discrimination
- Authorized representative

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



APPENDIX G

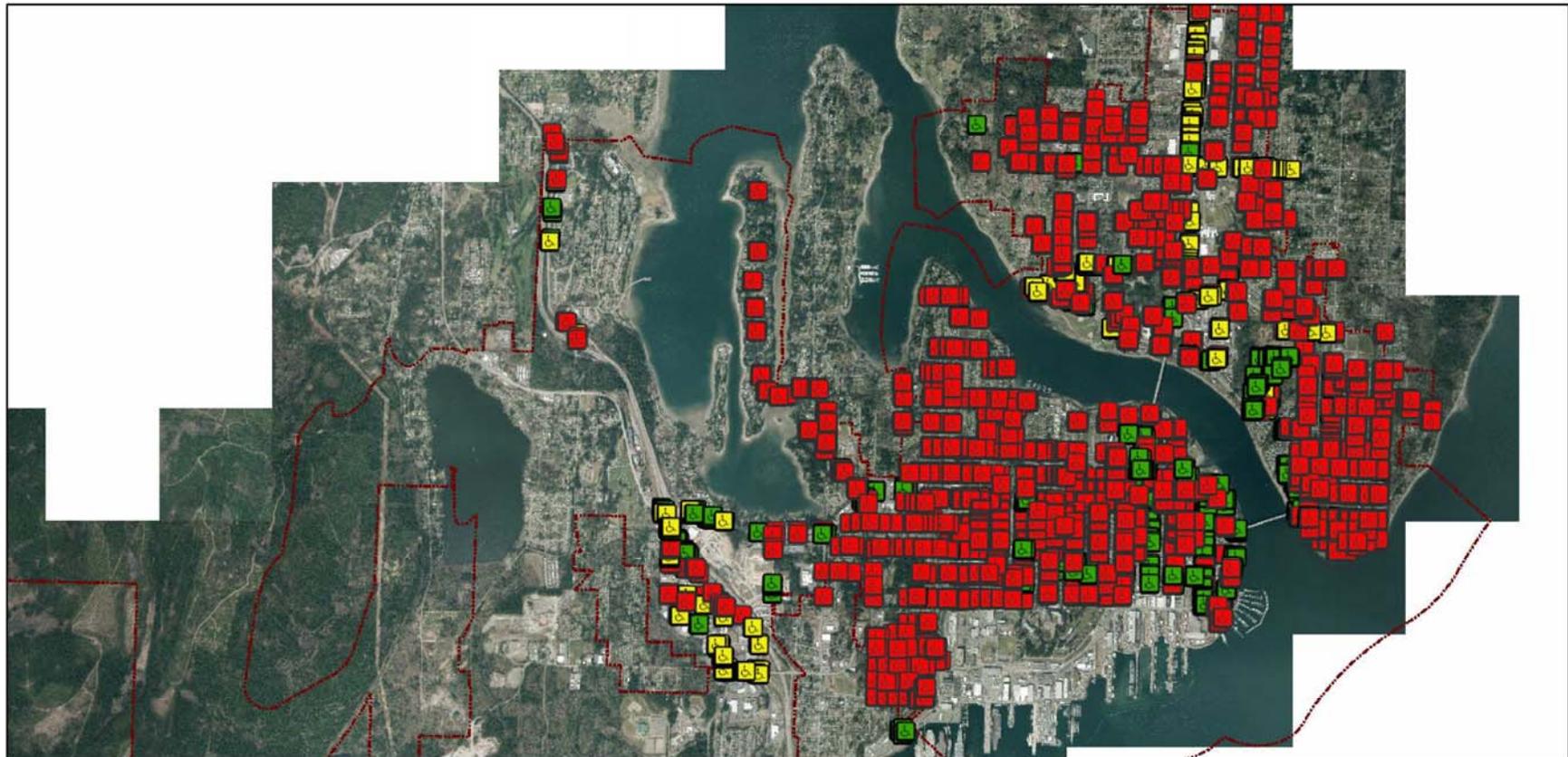
Inventory Zones

DRAFT



### APPENDIX H

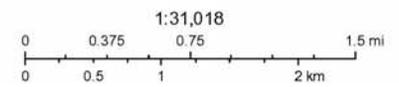
#### GIS Map of Inventoried Ramps as of September 19, 2016



September 19, 2016

#### Handicap Ramps

-  No
-  Partial
-  Yes
-  City Limits





APPENDIX I

Property Classification Codes

PROPERTY		Low	Med	High
CLASS CODE	DESCRIPTION			
1	REFERENCE STATUS			
111	SINGLE FAMILY RES	X		
111	SINGLE FAMILY RES (FL REMOVAL)	X		
119	1 MOBILE HOME ON RP	X		
118	MOBILE HOME - LEASED LAND	X		
119	MH (FL REMOVAL)	X		
118	NO FUTURE ASSESSMENT	X		
121	DUPLEX	X		
122	TRIPLEX	X		
137	TWO TRIPLEXES	X		
123	FOUR-PLEX	X		
131	5-9 UNITS	X		
132	10-14 UNITS		X	
133	15-19 UNITS		X	
134	20-29 UNITS		X	
135	30-39 UNITS		X	
136	40-49 UNITS		X	
137	50+ UNITS		X	
138	RETIREMENT APARTMENTS		X	
141	CONDO - RESIDENTIAL	X		
500	CONDO - RETAIL	X		
500	CONDO - OFFICE	X		
500	CONDO - MARINA	X		
150	MOBILE HOME PARK		X	
160	HOTELS AND MOTELS			X
161	BED AND BREAKFAST LODGING	X		
170	INSTITUTIONAL LODGING			X
180	OTHER RESIDENTIAL	X		
183	SHEDS AND GARAGES	X		
198	CABIN	X		
210	FOOD PRODUCT MANUFACTURING	X		
230	APPAREL/FABRIC MANUFACTURING	X		
240	WOOD PROD. MANUFACTURING	X		
250	FURN/FIXTURES MANUFACTURING	X		

DRAFT



APPENDICES

PROPERTY CLASS CODE	DESCRIPTION	Low	Med	High
1	REFERENCE STATUS			
270	PRINTING/PUBLISHING	X		
630	MISCELLANEOUS MANUFACTURING	X		
390	ALUM. PRODUCTS	X		
320	CLAY/GLASS PRODUCTS	X		
340	FABRICATED MATERIAL PROD.	X		
390	MISCELLANEOUS MANUFACTURING	X		
410	RAILROADS	X		
420	MTR VEH TRANSPORT	X		
430	AIRCRAFT TRANSPORT	X		
440	MARINE TRANSPORT	X		
450	RIGHT OF WAY	X		
459	TOTALLY ENCUMBERED BY EASEMENTS	X		
460	PARKING			X
470	COMMUNICATION	X		
480	UTILITIES	X		
483	WATER SYSTEMS	X		
485	SANITARY LAND FILLS	X		
489	OPERATING PROPERTY	X		
490	OTHER UTILITIES	X		
510	WHOLESALE TRADE	X		
520	RETAIL-BLDG MATERIALS	X		
530	RETAIL-GENERAL			X
540	RETAIL-FOOD			X
541	CONVENIENCE STORES WITH GAS PUMPS			X
543	CONVENIENCE STORES WITHOUT GAS PUMPS			X
545	CHAIN-TYPE GROCERIES			X
550	RETAIL-AUTOMOTIVE		X	
551	MANUFACTURED HOUSING SALES LOT	X		
559	AUTO WRECKING YARD	X		
560	RETAIL-APPAREL			X
570	RETAIL-HOME FURN			X
580	RETAIL-EATING			X
580	RESTAURANTS			X
581	FAST FOOD			X
582	TAVERN			X

DRAFT



## APPENDICES

PROPERTY CLASS CODE	DESCRIPTION	Low	Med	High
1	REFERENCE STATUS			
590	OTHER RETAIL TRADE			X
591	NEIGHBORHOOD CENTER			X
592	COMMUNITY CENTER			X
593	REGIONAL CENTER			X
610	FINANCE/INSURANCE/ETC.			X
611	BANKS			X
620	PERSONAL SERVICES			X
624	CEMETERY			X
630	BUSINESS SERVICES			X
637	GENERAL WAREHOUSE	X		
638	MINI WAREHOUSE	X		
640	REPAIR SERVICES		X	
641	SERVICE STATIONS		X	
650	PROFESSNL SERVICES			X
651	MEDICAL/DENTAL OFF			X
653	HOSPITALS			X
656	CONVALESCENT CENTER			X
660	CONSTRUCTION SERVICES	X		
670	GOVERNMENTAL SERVICES			X
637	STORAGE	X		
680	EDUCATIONAL SERVICES			X
690	MISC SERVICES		X	
691	CHURCHES			X
710	CULTURAL ACTIVITIES			X
720	PUBLIC ASSEMBLY			X
730	AMUSEMENTS			X
530	AMUSEMENTS			X
740	RECREATIONAL			X
740	RECREATIONAL (FL REMOVAL)			X
744	MARINA			X
750	RESORTS/GROUP CAMPS			X
760	PARKS			X
790	OTHER RECREATION			X
810	AG (NOT O.S.)	X		
820	AG RELATED	X		



PROPERTY		Low	Med	High
CLASS CODE	DESCRIPTION			
1	REFERENCE STATUS			
822	VETERINARIAN SVCS			X
830	OPEN SPACE - AGRICULTURE	X		
840	FISHING/RELATED SVC	X		
850	MINING/RELATED SVC	X		
880	CLASSIFIED FOREST LAND	X		
880	DESIGNATED FOREST LAND	X		
890	RESOURCE PRODUCTION	X		
910	UNDEVELOPED LAND	X		
910	UNDEVELOPED LAND (FL REMOVAL)	X		
911	COMMON AREA			X
920	NONCOMMERCL FOREST	X		
930	WATER AREAS	X		
939	TIDELANDS	X		
940	OPEN SPACE			X
950	OPEN SPACE - TMBR	X		
990	OTHER UNDEV LAND	X		

DRAFT