

WPPA SMALL PORTS SEMINAR · OCTOBER 22, 2026

Website Accessibility for Washington Ports:

What's involved and what it will cost

Michael Page · Underground Creative

8 accessibility vendors interviewed · all 68 Washington port websites measured

WHY I DID THIS RESEARCH

This research is a free resource.

Success: every port meets the requirement on deadline and under budget.

ADA TITLE II · PORTS ARE SPECIAL PURPOSE DISTRICTS

April 26, 2028

EVERY PORT, ANY SIZE

**Seattle and the smallest
port: same date**

TIME LEFT

**About 18 months from
today**

THE STANDARD

WCAG 2.1, Level AA

Written by the W3C, free to read

It covers your website, its documents, and the outside systems you send people to.
Also social posts, newsletters and video.

The deadline: DOJ rule, 91 FR 20902 (2026) · I'm not a lawyer, so please speak with yours.

What is accessibility?

People can use your website however they use the web: with a screen reader, a keyboard instead of a mouse, magnification, or without sound. WCAG is organized around four principles.

P

Perceivable

People can take in the content through a sense they can use, not only sight.

Images described, videos captioned, text that stands out

O

Operable

Every interaction works without a mouse, with enough time to finish.

Keyboard only, a visible focus, links that say where they go

U

Understandable

Content and behavior are predictable. Errors are easy to recover from.

Labeled form fields, clear error messages

R

Robust

Built so assistive technology, present and future, can read it.

Buttons and menus a screen reader can name

Common misconceptions

"Our vendor takes care of compliance."

You can outsource the software. Not the liability.

Federal rule, 28 CFR §35.200(a)

"Our widget makes us compliant."

A single line of code, on its own, doesn't make a site compliant.

Federal Trade Commission order, April 2025: \$1 million penalty

"The free scan came back clean. We passed."

A clean scan is a start, not a grade.

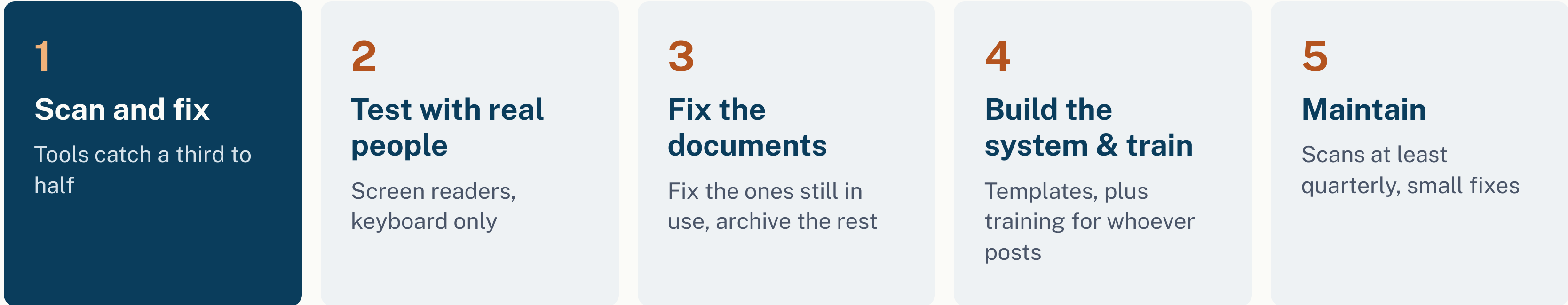
U.S. Department of Justice web guidance, 2022

Does being small change anything?

Same standard, same deadline: April 26, 2028.

DOJ final rule (2024) and extension (2026)

Five stages, not one purchase



Most common problems we found: faint text, unnamed links, undescribed images

Free scans you can run Monday

 WAVE wave.webaim.org	 Lighthouse pagespeed.web.dev	 axe DevTools deque.com/axe/devtools
 Pope Tech pope.tech	 Accessibility Checker equalizedigital.com	 PAC pac.pdf-accessibility.org

Free tiers as of Oct 2026. Listed for reference: I don't represent or endorse any vendor.

What drives the cost



Unique templates

Determines the size of the audit, the biggest line



Documents

A key driver you control



Forms and outside systems

Payments, forms, bookings: ask your vendor

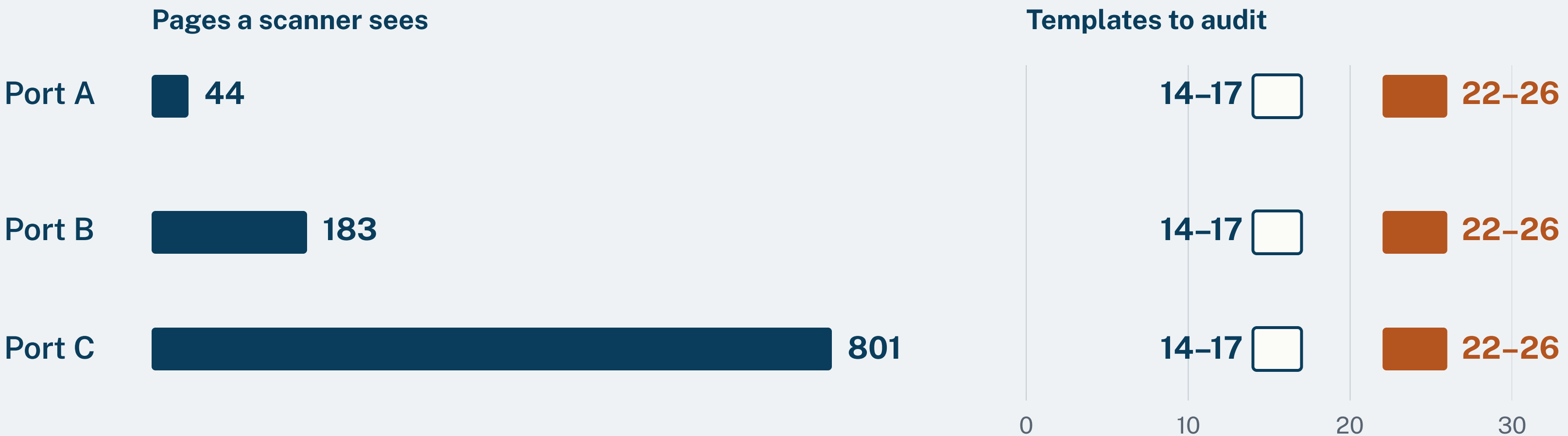


Upkeep

Every year after

Not on the list: page count. An automated scan is essential, but it's the lowest-cost step for many ports.

Audits count templates, not pages



Solid rust: two vendors' estimates, 22–26. Outlined: a third vendor's count, 14–17.
The sites differ 18 times over; the audits barely differ.

Vendors' estimates, October 2026. Their accounts, not mine.

The website is small. The paperwork isn't.

25,025 PDFs across 48 small and medium port websites.

One port

10 pages
10 PDFs

Another port

21 pages
1,926 PDFs

A third

55 pages
4,034 PDFs

Same rule, very different jobs.

PDF files linked from each site, counted Sept 28, 2026. Size, not accessibility.

WHAT IT WILL COST

The official number, and is it right?

1 · THE JUSTICE DEPARTMENT

**\$17,600
over 10 years**

a typical special district. About **\$2,100**
a year (annualized), under 0.1% of
revenue.

2 · THE SBA'S OFFICE OF ADVOCACY

*"Advocacy believes that the DOJ
has underestimated the
compliance costs and burden
hours."*

U.S. Small Business Administration, Office of
Advocacy, to DOJ, October 2023

3 · WHAT VENDORS ESTIMATED

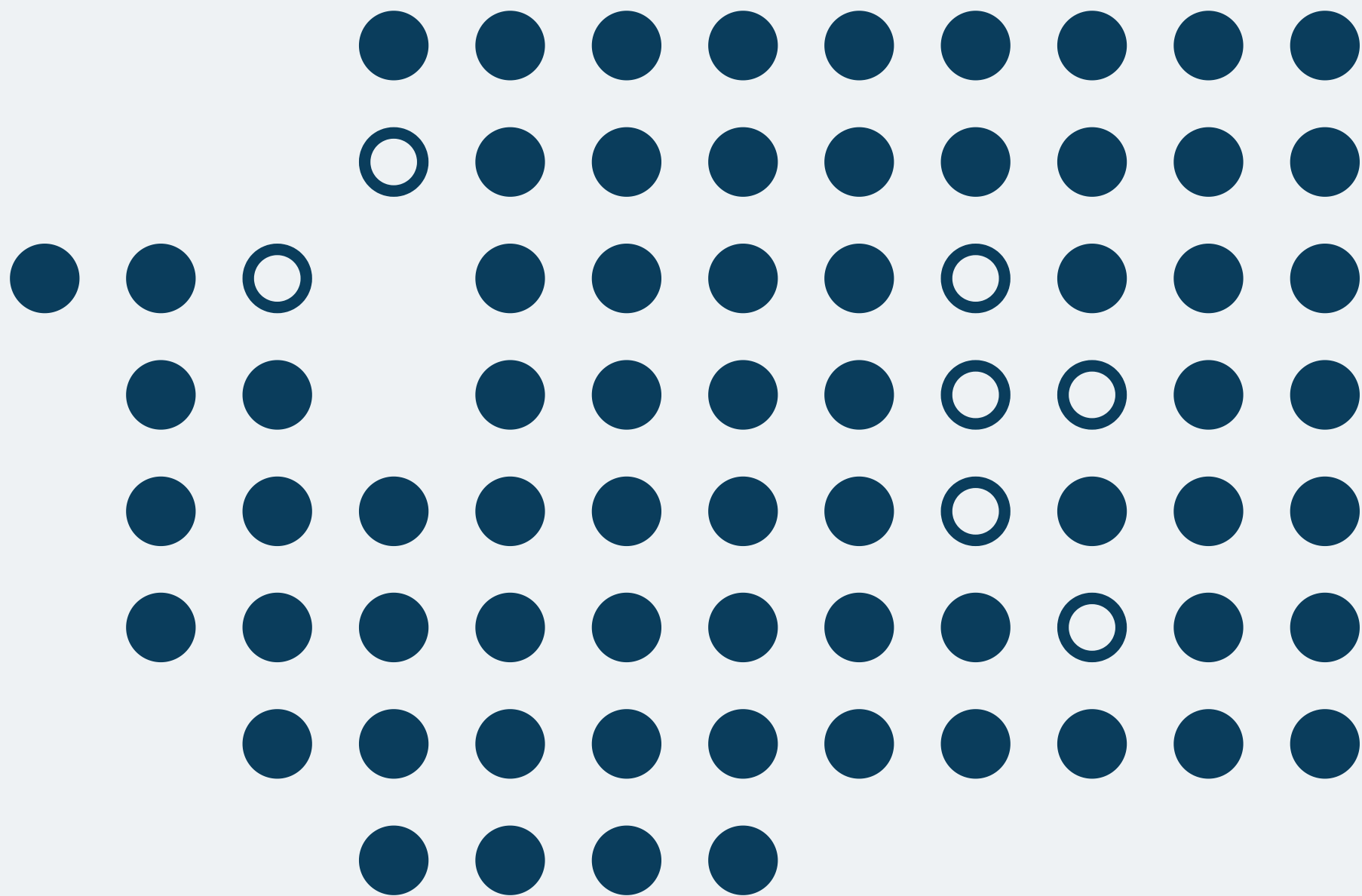
\$1,500–\$17,000

an independent audit of one site, from a
few key pages to a full site

Every port in Washington

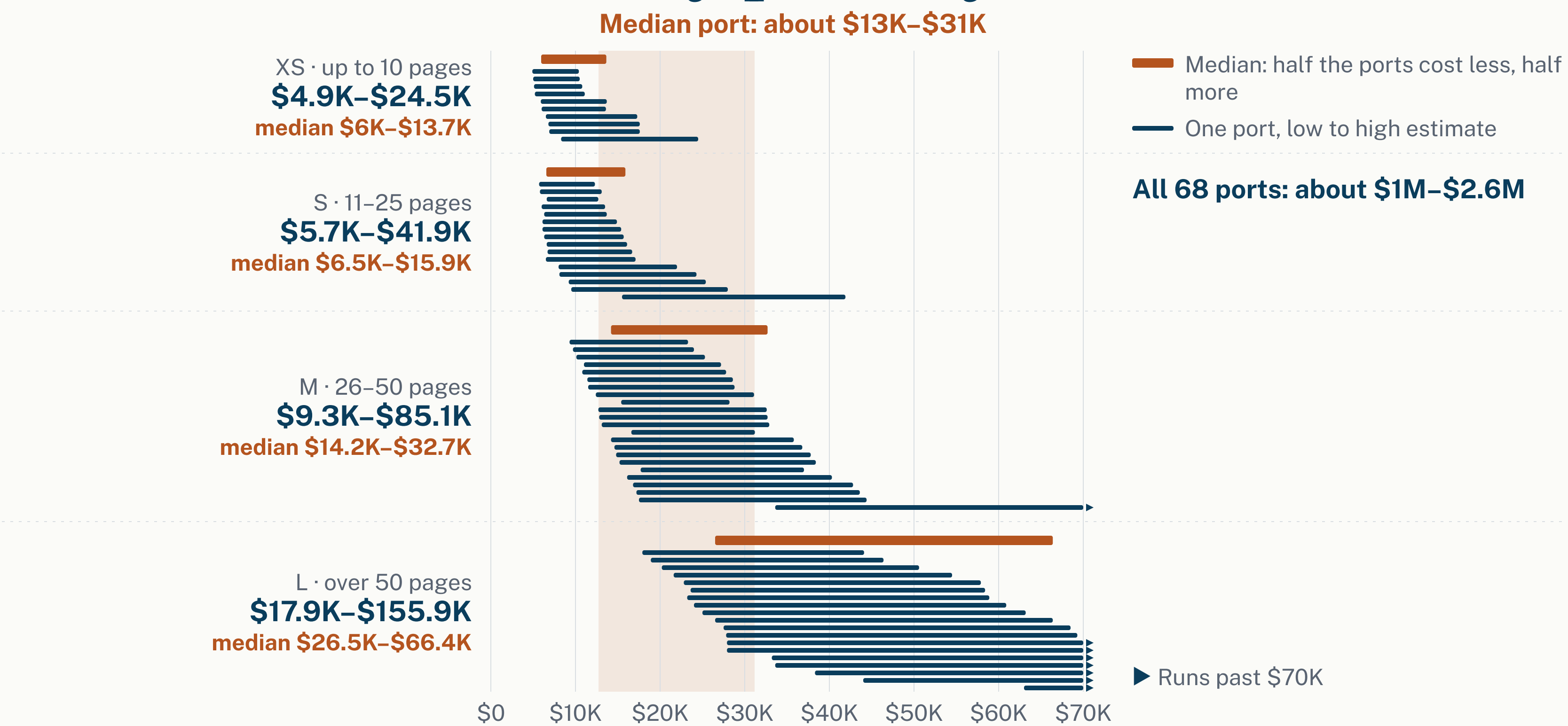
75 port districts. 68 websites.

We measured all 68.



Filled: has a website (68). Hollow: no website found (7), shown near their towns.

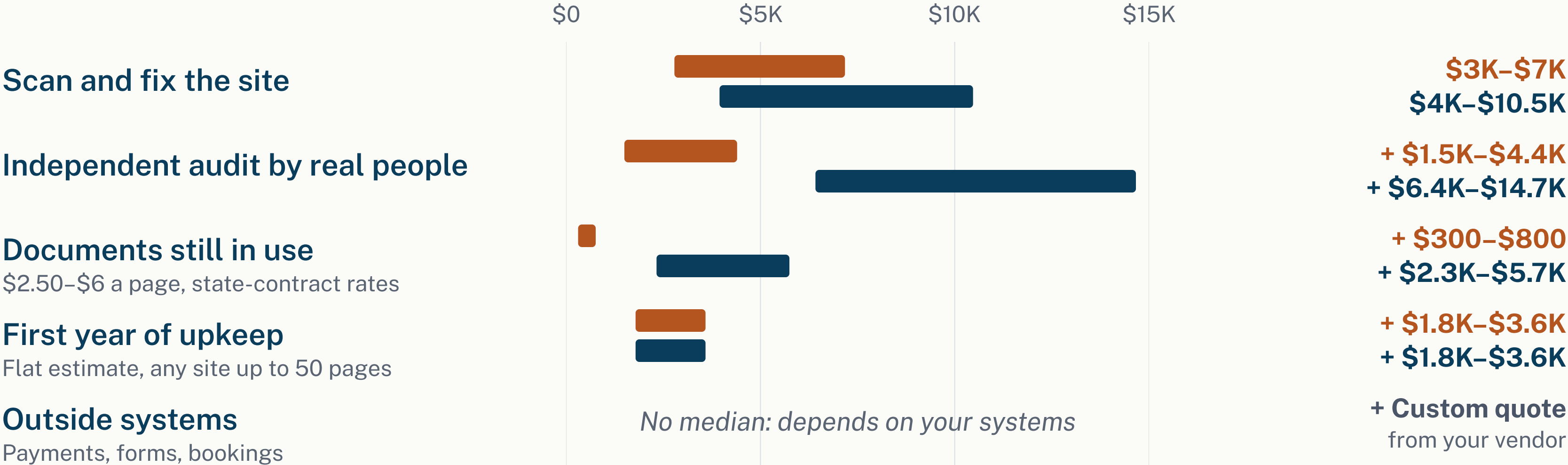
Next 18 months, every port, by size of website



Planning estimates based on vendor pricing, including a first year of upkeep. Not a ranking.

Where the money goes

Year one, median for each line ■ Small, up to 25 pages ■ Medium, 26–50 pages



Year one, median

Before outside systems

Small: about \$6K–\$16K
Medium: about \$14K–\$33K

Planning estimates, not quotes. Each line and each total is a median, so a total won't equal the sum of its lines.

LEVERS YOU CAN PULL

Two levers to reduce costs

1 Fewer templates

The audit tests each template once. Fewer templates: a smaller audit and less upkeep.

2 Web pages, not PDFs

About 39
new documents a year at the median
port: agendas, minutes, notices, press
releases

As PDFs: about \$300–\$1,400 a
year to fix, every year
As web pages: nothing extra
Fix only documents still in use. Archive
the rest.

And train whoever posts, so new documents start out accessible.

New documents dated 2025, median of 48 port sites. Fix cost: 39 documents × 3–6 pages × \$2.50–\$6 a page (state contract DES 02024). Archive rule: 28 CFR §35.201(a).

Repair the old site, or rebuild?

It depends mostly on size.

Small · up to 25 pages

26 ports

XS \$4.9K–\$24.5K

S \$5.7K–\$41.9K

Rebuilding most often makes sense.

Medium · 26 to 50 pages

23 ports

Year one \$9.3K–\$85.1K

A toss-up. Get both quotes.

Large · over 50 pages

19 ports

Year one \$17.9K–\$155.9K

Rebuilding rarely wins in year one. It can pay off later, in lower upkeep.

Repair fits a recent site, staying on the same platform, with a mostly clean scan.

I build websites, so I'm not neutral here. Ask for both quotes.

Year-one ranges from the chart on slide 12, all 68 port websites. Planning estimates, not quotes.

Five questions for any vendor

1 Who does the testing, and with what?

2 What's not included?

3 Can I see a sample report?

4 Who fixes what you find?

5 Will you answer my email in a week?

Get the answers in writing. These apply whoever you hire.

Your 18-month work list

Now – Jan 2027 Name an owner. Count pages and documents. Free scan. Stop new PDFs. Staff time	Feb – Jun 2027 Choose help with the five questions. Fix templates and forms. Small: \$3K–\$7K Medium: \$4K–\$10.5K	Jul – Dec 2027 Documents in use, newest first. Test with real people. Small: \$2K–\$5K Medium: \$8K–\$19K	Jan – Apr 2028 Retest. Post an accessibility statement and a way to report a barrier. Keep a dated test record. Plan for ongoing training. Upkeep begins
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Put a range in your 2027 budget.

April 26, 2028

I didn't locate any grants or financial assistance programs.

Small (up to 25 pages) and medium (26–50 pages) ports shown, medians. Planning estimates, not quotes. Check your own fiscal year.

ONE OPTION, IF IT FITS

The Accessibility Foundation Rebuild

\$2,500

For port sites up to about 25 pages, not counting news posts or meeting records. Larger sites, or extras like payments and booking, get a custom quote.

Automated scanning, and fixing what it finds, through build and launch, at no extra cost.

Included:

- Your site rebuilt on up to 8 checked templates, with two forms
- An accessibility statement and a report-a-barrier link
- A meeting-records template
- Training for whoever posts

Not included:

- Testing with real people (the independent audit)
- Fixing documents
- Outside systems
- Hosting and ongoing monitoring

A clean build should make that testing cost less.

First steps

- 1 Name the person who owns this.
- 2 Run a free accessibility scan.
- 3 Ask vendors for their VPAT, and put WCAG 2.1 AA in your contracts.

Questions?

Every source, how the numbers were built,
and a free report for your port:

findusunderground.com/accessibility

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