

Procedure Americans With Disabilities Act Transition Plan for Curb Ramps	Last Update: August 2018
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References: Title II 28 C.F.R. 35.150 (d); 2010 ADA Standards for Accessible Design by the US Department of Justice (September 15, 2010); Requirements to Provide Curb Ramps when Streets, Roads, or Highways are Altered through Resurfacing, Supplement to Requirements to Provide Curb Ramps when Streets, Roads, or Highways are Altered through Resurfacing; County Policy Manual- Americans with Disabilities Act, Americans with Disabilities Grievance Procedure, Americans with Disabilities Designated Employee Procedure, Americans with Disabilities Act Public Notice Procedure, Americans with Disabilities Act Title VI Plan Procedure, Americans with Disabilities Act Transition Plan Procedure

Purpose: To address accessible paths of travel within Jefferson County’s Right-of-Way by creating a plan for replacing and installing curb ramps.

A. 28 C.F.R. Section 35.150(d)(3)(i): Identify physical obstacles in the public entity's facilities that limit the accessibility of its programs or activities to individuals with disabilities.

1. Jefferson County (the County) has developed a comprehensive evaluation plan consisting of physical review and measurement of curb ramps:
 - Curb ramp presence, configuration, geometry, grades, and condition
 - Detectable warnings panel presence, geometry, contrast, and condition

At the end of 2017 the County had surveyed approximately 8,237 locations with curb ramps. The curb ramps were either compliant with current ADA standards, constructed to non-compliant condition, or missing. Many of these locations, while not fully compliant, provide some degree of accessibility. Based upon the self-assessment survey, approximately 5% of the curb ramp locations were fully compliant and provided compliant accessibility. Of the locations assessed, 704 require curb ramps to be added to provide full accessibility at those locations. Approximately 4,880 locations did not have an acceptable detectable warning panel present. The most prevalent issues with non-compliant curb ramps included improper running slope, non-compliant flared sides, and missing detectable warning surfaces. An up-to-date report of progress toward achieving full compliance County-wide is available from the County’s public infrastructure database maintained by the Road & Bridge Division.

B. 28 C.F.R. Section 35.150(d)(3)(ii): Describe in detail the methods that will be used to make the facilities accessible.

1. The ADA Standards in this section are intended to apply to all new and replacement curb ramps within County right-of-way.
2. It is anticipated the majority of the accessibility improvements will be performed in conjunction with other projects and activities occurring within the County. The

following illustrates the most anticipated efforts and how each may improve accessibility:

- a. Alterations of Streets/Roads: Work involving alterations as defined by the DOJ/DOT Joint Guidance on streets and roads in County Right-of-Way shall include new or upgraded curb ramps in compliance with ADA Standards.
 - b. Priority Areas: Curb ramps serving high pedestrian areas such as schools, hospitals, senior living centers, and religious buildings will be prioritized where work involving alterations is in proximity. Recreational pedestrian traffic areas such as shopping centers, parks, and other recreation facilities will be improved as funding allows. Locations identified from the grievance process will be addressed and prioritized on a case-by-case basis.
3. When determining the manner and options for providing accessibility, the County considers many factors including the volume of pedestrian traffic, population density, and the street or road average daily vehicle traffic volume. Considering these factors along with funding challenges, the County anticipates prioritizing implementation in locations where adjacent roadway or infrastructure improvements are taking place and in priority areas serving county buildings and facilities, schools, hospitals, recreation facilities, etc.
 4. Where possible, out-of-direction travel may be utilized to provide an accessible path, for short or long periods of time until a more direct accessible path can be provided.
- C. 28 C.F.R. Section 35.150(d)(3)(iii): Specify the schedule for taking the steps necessary to achieve compliance, the time period of the transition plan, and identify steps that will be taken during each year of the transition plan.

The County endeavors to improve accessibility annually on a priority basis considering the criteria presented above with an overall goal to have all curb ramps in compliance in the next 30-50 years. In pursuit of that goal, the County will improve at least 3% of overall curb ramps each year, taking priority areas and locations identified through grievances into consideration.

- D. 28 C.F.R. Section 35.150(d)(3)(iv): Indicate the official responsible for implementation of the plan.

See the Americans with Disabilities Act Policy and the ADA Designated Employee Procedure.