Americans with Disabilities Act ADA Transition Plan

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DuPage County Division of Transportation 2020



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A NOTE FROM THE CHAIRMAN

Dear Residents,

Thank you for taking time to learn more about the DuPage County Division of Transportation's ADA Transition Plan. This document reflects our commitment, over the next few decades, to improve County-owned roadway accessibility. We are proud of the pedestrian network that has been established throughout DuPage County. We have 220 miles of County roadways, more than 200 miles of sidewalks, and 343 signalized intersections that provide a safe way for residents and visitors to travel through our beautiful communities and neighborhoods.

These plans align with the mission of DuPage County, embody the spirit of the DuPage Accountability, Consolidation, and Transparency (ACT) Initiative, and satisfy federal requirements outlined by the Americans with Disabilities Act of 1990. DuPage County continues to be transparent by giving people with disabilities a process for public engagement through this plan, while providing opportunities for dialogue about ADA accommodations in the future.

The County has added a new goal of building upon diversity and expanding inclusion to its Strategic Plan. The ADA Transition Plan works toward that goal by improving our inclusiveness for people with disabilities in DuPage County. Through this plan, the County seeks to eliminate barriers for people with disabilities who want to easily access and enjoy our County trails and walkways.

The goals outlined in this plan will provide important improvements to our transportation network. A strong, accessible system benefits our entire region and furthers our efforts to make DuPage County a great place to live, work, and raise a family.

Thank you,

Dan Cronin DuPage County Board Chairman





EXECUTIVE SUMMARY

The DuPage County Division of Transportation is pleased to present its first Americans with Disabilities Act (ADA) Transition Plan. This plan works in tandem with the DuPage County <u>Strategic Plan</u>. The Transition Plan builds upon a number of imperatives in the Strategic Plan including: Quality of life, Customer Service, Diversity and Inclusion, and Economic Growth.

This Plan addresses the Division of Transportation's (DuDOT) pedestrian network within its rights of way, and the pedestrian network on the DuPage County campus. This system is a relatively well-developed network that includes over 200 miles of sidewalk. DuDOT's pedestrian network has presence in all but a handful of communities in DuPage County, and is adjacent to nearly 50,000 residences and 3,000 businesses. The goal of the Plan is to ensure a safe environment for people of all ages and abilities. In making these systems safer and friendlier environments, the County hopes to support these key themes:

- Ensure a safe and reliable transportation system that provides modal choices and is sensitive to the environment.
- Ensure all residents of DuPage County have maximum access to community services.
- Help people maximize independence and achieve economic self-sufficiency.
- Remove barriers to employment and job training for people with disabilities, homeless people, and other under-represented populations.
- Strengthen the County's business retention, expansion and attraction initiatives.
- Adopt strong and predictable customer service procedures that meet public expectations.

The ADA Transition Plan is a federally-mandated plan document that describes how a public agency will bring its public facilities into compliance with ADA. Transition plans operate by a set of guidelines or codes that apply to their types of facilities that they own and maintain. In the context of transportation agencies such as DuDOT, the guidelines that must be followed are known as the Public Right of Way Accessibility Guidelines, colloquially known by the acronym PROWAG. Those guidelines lay out design standards for slopes of sidewalks and curb ramps, reach heights and distances for pedestrian signal push buttons, and requirements for how those facilities must be situated and maintained.

The Division of Transportation surveyed its facilities over the course of three years to determine its compliance with PROWAG on its existing system:

- 200 miles of sidewalk.
- 343 signalized intersections.
- 1,905 curb ramps.

Using the data collected from those field surveys, DuDOT staff developed a plan for correcting barriers to accessibility on its pedestrian network. Barriers were identified, inventoried, and will be addressed through the Division of Transportation's Action Plan. The scope of the Action Plan includes:



- Repairing and/or replacing deficient sidewalk sections.
- Repairing and/or replacing non-compliant curb ramps.
- Replacing and/or improving traffic signals and pedestrian push button devices.

The Division of Transportation invited the public to view and comment on the Transition Plan. Feedback from the attendees at the public meeting assisted staff in refining the Plan and making it accessible to everyone. Staff and resources have been made available to all users of DuDOT's pedestrian network.

• The Division of Transportation has designated an ADA Coordinator and ADA Implementing Official. These two staff members will collaborate with other staff to implement the Action Plan.



INTRODUCTION

The Americans with Disabilities Act (ADA) mandates that each public agency must develop a Transition Plan (also referred to as "Plan") that ensures accessible facilities are provided in the public right of way. The DuPage County Division of Transportation's ("DuDOT") transition plan will focus solely on DuDOT right of way responsibilities. Those include all pedestrian facilities within DuDOT right of way and the pedestrian facilities on the County Campus ("County Campus" or "Campus"). The Transition Plan is required to contain certain key elements in order to guide the planning and self-evaluation processes, maintain transparency with the public, provide equitable and accessible processes for persons seeking to file grievances, and provide clarity on how a jurisdiction will attain full compliance with United States Federal Proposed Right of Way Accessibility Guidelines, also known as PROWAG.

MANDATE

The Americans with Disabilities Act, signed into law in July of 1990, protects people with disabilities from discrimination. Pursuant to that law, all public facilities at every administrative level are mandated to be physically accessible to people with mobility and sensory limitations. In the public right of way, their physical design is subject to PROWAG.

Americans with Disabilities Act

The enactment of ADA greatly expanded the Rehabilitation Act, a 1973 law that prohibits employers, federal funding recipients, and government contractors from discriminating against people with disabilities. The ADA expands upon the Rehabilitation Act by mandating that all state and local governments and all of their programs and facilities—no matter their funding sources—must provide equal access for those with disabilities.

Because ADA is a civil rights law, the federal enforcement entity for the ADA is the Civil Rights Division of the US Department of Justice (DOJ). The DOJ enforces ADA through various means: establishing standards for meeting the requirements of the ADA; coordinating enforcement activities of other federal agencies; and, as necessary, taking legal action to require compliance with ADA by state and local governments.

For more information about the Americans with Disabilities Act, go to the Information and Technical Assistance page of the US DOJ at <u>www.ada.gov</u>.

P.R.O.W.A.G.

The set of guidelines known as PROWAG were developed by the Public Rights of Way Access Advisory Committee (PROWAAC), a committee of the United States Access Board. The Access Board is a federal agency that promotes equality for people with disabilities through leadership in accessible design and the development of accessibility guidelines and standards. As a coordinating body, the scope of their recommendations and guidance includes but is not limited to public rights of way, public buildings, and medical facilities.

PROWAG standards provide design guidance for a wide variety of facilities in the public right of way, including: curb ramps, sidewalks and pedestrian access routes, traffic signals, and signage. The majority of the guidelines are particularly sensitive to people who are wheelchair-bound or have low vision, though the guidance is intended to eliminate all access barriers.



The authority for PROWAG stems from Title II of the ADA. Title II sets out the steps that state and local governments must take to make public transportation facilities accessible to people with disabilities. With the passage of the ADA, failure to design an accessible public facility constitutes discrimination. Under Title II, private citizens or groups can file a discrimination complaint to the DOJ or appropriate federal agency, or file a lawsuit in federal district court. In compliance with the latest PROWAG standards, each government agency is responsible for providing accessible facilities for people with disabilities.

For more information about the US Access Board's Proposed Right of Way Accessibility Guidelines, visit their website at www.access-board.gov/guidelines-and-standards/streets-sidewalks/public-rights-of-way.

Illinois Environmental Barriers Act

The Environmental Barriers Act of 1985 (EBA), amended in 1997 and 2017, is the State of Illinois' administrative code for bringing public facilities into compliance with ADA standards. While the term "public facilities" is intended to refer to all publicly-owned, leased, or dedicated lands at all administrative levels, the definition specifically identifies that terminology as applicable to "a public right-of-way."¹ The EBA serves multiple purposes: it establishes accessibility guidelines for State and local agencies, and it sets thresholds at which alterations to public facilities will require agencies to implement ADA improvements. In Illinois, these guidelines are known as the Illinois Accessibility Code.

In Illinois, the designated enforcement agency for compliance with the ADA and EBA is the Office of the Attorney General (AG). The Illinois AG's office coordinates with other state agencies to investigate alleged local ADA civil rights violations and, if necessary, take legal action. The Disability Bureau of the AG's office disseminates public information about disability law, connects professionals with sensitivity training opportunities, and provides procedures to file discrimination complaints.²

For more information about the Environmental Barriers Act, go to the Illinois Attorney General Office's website at <u>www.ag.state.il.us/rights/environmental_barriers.html</u>.

For more information about the Illinois Accessibility Code, go to the Building a Better Illinois website at

https://www2.illinois.gov/cdb/business/codes/IllinoisAccessibilityCode/Pages/default.aspx.



PLAN ELEMENTS

The Plan serves as the Division of Transportation's policy for design, construction and maintenance of ADA-accessible facilities on DuDOT rights of way, as well as on the grounds of the County Campus. Pursuant to the requirements of the ADA, local governments are required to develop a transition plan for public facilities. As part of the transition planning process, a public agency is mandated to:

- Conduct a self-evaluation to identify physical obstacles that limit the access to its facilities by individuals with disabilities;
- Describe the methods to be used to make the facilities accessible;
- Provide an action plan for removing barriers to access; and
- Identify the public officials responsible for implementation of the Transition Plan.

The subject matter covered in the Transition Plan is as follows:

1. Public Participation and Engagement Process

The public participation section discusses the process DuDOT has used regarding outreach to the community and to affected populations. Public comment and presentation materials are provided in Appendix A.

2. Transition Plan Self-Evaluation and Priority Areas

The self-evaluation section presents the state of the pedestrian system and accessibility measures as determined through comprehensive field surveys conducted by DuDOT staff. Appendices B-1 and B-2 provide information about the Self-Evaluation process, and Appendix C-1 summarizes the Self-Evaluation's results.

3. Action Plan and Schedule to Remove Barriers to Accessibility

DuDOT intends to remediate barriers to accessibility on its pedestrian system. The Plan Implementation section details DuDOT's approach and processes relating to the removal of those barriers.

4. Monitoring Action Plan Progress

The Division of Transportation must demonstrate its compliance with its transition plan, and must make DuDOT's progress publicly available. This section also details the Division of Transportation's long-term monitoring strategy to identify new barriers and adequately maintain the pedestrian network. The Plan Implementation section describes DuDOT's monitoring process.

5. Designation of an ADA Coordinator and Implementing Official

The Division of Transportation must designate of an official ADA officer who will respond to ADA complaints and coordinate with staff to implement the Action Plan.

6. ADA Complaint Procedure

The Division of Transportation must provide an accessible method for DuPage citizens to report accessibility issues. This section describes that procedure and how DuDOT will process and resolve the complaints. Complaint forms can be obtained in Appendix D.



PUBLIC PARTICIPATION AND ENGAGEMENT

The DuPage County Division of Transportation circulated a draft copy of the Transition Plan for public comment from November 18, 2019 through January 24, 2020. During this comment period, the public was invited to send comments to DuDOT staff via mail, electronic mail, or to comment in person at one of two public meetings held in DuPage.

Public Meetings

In addition to the public at large, staff identified 34 organizations who represent people with disabilities in DuPage County and contacted them directly to invite them to comment and attend the meetings.

An accessible website was created for the purposes of disseminating information and allowing the Public to comment and file ADA grievances with the County. The address for that web page is as follows:

www.dupageco.org/dot/ada

The Draft Transition Plan and presentation was posted for review on the DuDOT ADA web page prior to the public meetings. The Plan will be continuously available on this web page and updates will be posted and saved accordingly. Plan updates as well as changes to schedule, process and key personnel will be posted on this site on a regular basis.

The public meetings were held on December 17, 2019 and January 7, 2020. The first was held at the Addison Village Hall in Addison, Illinois. The second meeting was held at PowerForward DuPage in Warrenville, Illinois. Both locations were selected for their proximity to transit accommodations, location within the County, and their accessibility for people with disabilities. Two sign language interpreters and a court reporter were present at both meetings to assist with attendees with providing official comments.

Information about the Transition Plan was summarized on poster boards for attendees to view at their convenience. The boards at each location were placed around the room, and staff were available to answer any questions or concerns about the information on the boards. Copies of the plan were available for attendees to take with them for further review. See <u>Appendix A</u> for meeting materials and a list of invited organizations.

Communications with the Public

For more information about how the Division of Transportation will make itself accessible to inquiries, complaints, and ongoing communications with the public, please see the sections titled <u>Action Plan</u>, <u>ADA Coordinating Officials</u>, and <u>Complaint Procedure</u> in this document. And, to review materials that were circulated in conjunction with the County's public engagement activities, please see <u>Appendix A</u>.

AMERICANS WITH DISABILITIES - DUPAGE CONTEXT

The County of DuPage is predominantly a suburban county within the greater Chicago region in northeastern Illinois. As is typical of suburban areas, DuPage's population and employment grew rapidly in the second half of the Twentieth Century. Today, the County is home to 930,128 residents³ in 34 municipalities and nearly 600,000 employees.⁴

The County responded to that growth by adding to its highway and pedestrian system. As of 2018, the County system includes 220 miles of arterial road, more than 200 miles of sidewalk, 343 traffic signals with pedestrian accommodations and 49 bridges. In addition, there are 1160 unsignalized side streets and almost 2000 commercial driveways where pedestrian ramps, islands and crosswalks exist. The County owns and maintains virtually all of the pedestrian system within the highway right of way.

The pedestrian system has been built incrementally over time. Most of the sidewalk was added as part of capital roadway projects or intersection projects. DuPage County has operated under the Healthy Roads policies since 1995 wherein the County has recognized the value of providing nonmotorized facilities where practicable and safe. Sidewalk and path have also been built under separate contracts to address discontinuities in the system. Often, gaps in the system are also filled through work done by developers under permit. In all cases, County staff has imposed design and construction standards for pedestrian facilities consistent with those recommended by the Illinois Department of Transportation at the time of construction.

People with Disabilities

People with disabilities often have specific transportation needs. Under the Americans with Disabilities Act, the County is required to address those diverse needs, both within the public right of way and on the county campus. In 2016, there were 78,773 people in DuPage County with a reported disability, comprising approximately 8.5% of the total population.⁵

Often, citizens in DuPage County reported multiple disabilities. More than 37,000 people reported ambulatory disabilities while more than 35,000 people reported vision and hearing disabilities.

DUPAGE **BY THE NUMBERS Highway Centerline** Miles 220 Sidewalk Miles 200 Signalized Intersections 272 Unsignalized Intersections <u>60</u> Bridges **1**9





The Census also shows that people with disabilities earn incomes that are lower than average:⁶

- People with disabilities are less likely to be employed. In 2016, 70.5% were either unemployed or not in the labor force. Fewer than 26% of workforce-aged adults without disabilities were either unemployed or not participating in the workforce in DuPage County.
- In 2016, the median per capita income for a person with a disability in DuPage County was \$26,836, which is 64% of median per capita income for an individual without a disability (\$42,005).
- In 2016, people with disabilities were nearly twice as likely as people without disabilities to live in poverty. Over 18% of people with disabilities lived below 150% of the poverty line, compared to 9.3% of people without disabilities.

In summary, the demographic data reveals that people with disabilities in DuPage County tend to be older and less affluent than people without a disability. People with disabilities tend to reside in denser portions of the County, closer to public services and transit. These findings are critical to DuDOT staff for properly understanding the transportation needs of DuPage constituents, and how DuDOT can leverage its resources to provide users with proper accommodations.



SELF-EVALUATION

The self-evaluation is the process through which the Division of Transportation assessed compliance of its facilities with the 2011 Proposed Guidelines for Pedestrian Facilities in the Public Right of Way (PROWAG).⁷ The PROWAG document is enforced as best practice, and the federal government requires state and local governments to follow its guidelines. The self-evaluation process identifies barriers to accessibility and serves as the cornerstone for developing a program to correct those deficiencies. Although standards have evolved over time, the DuPage County Division of Transportation remains committed to constructing facilities to the most recent applicable PROWAG guidelines. While some facilities are no longer in line with the most current edition of PROWAG, all DuDOT facilities have been constructed to the standards that existed at the time that they were designed and built.

See <u>Appendix B-1</u> for examples of barriers to accessibility.

Evaluation Process

The evaluation process took place over the course of three years. The data collection phase, which included all field and office-based surveys, involved four survey efforts carried out by County staff:

1. Signalized Intersection Ramps: 2015-16

Signalized intersection ramps were directly surveyed by engineering staff using a standard field survey developed by the Illinois Department of Transportation. DuPage adapted this standard survey form to a tablet application. Twenty-four (24) factors in addition to location data were recorded at each curb ramp surveyed. The field survey data dictionary can be found in <u>Appendix</u> <u>B-2</u>. A total of 1,905 curb ramps at signalized intersections were surveyed.

2. Pedestrian Signals and Accessibility: 2016-17

Signal hardware (i.e., pedestrian buttons and pedestrian signals) is an important part of nonmotorized mobility. Poorly located crossing buttons and missing buttons are as much of an obstacle to mobility as poor sidewalks and ramps. Staff surveyed each quadrant at 330 of DuDOT's 343 signalized intersections. Staff reviewed a variety of factors including, but not limited to:

- Pedestrian push button presence, and accessibility of the location
- Pedestrian signal presence and visibility
- Pedestrian push button compliance with PROWAG accessibility standards
- Currently, a total of 1,507 pedestrian push buttons are located on DuDOT's system

3. Sidewalk Conditions Assessment: 2017-18

Sidewalk condition was assessed for the entire 200 miles of DuPage County sidewalk except in locations with ongoing construction or maintenance. Sidewalk survey included all segments between signalized intersections. Ramps at signalized intersections, which were accomplished in 2016, were not included in this assessment. These surveys included ramps at unsignalized side streets and commercial driveways.



Surveys determined sidewalk compliance through factors such as the following:

- Grade slope or Running slope
- Cross slope
- Obstructions
- Sidewalk width

- Sidewalk surface condition
- Driveway islands
- Faulting
- Fixed objects

The type, magnitude and density of issue allowed staff to classify each sidewalk segment into the qualitative categories Good, Fair, or Poor. The logged information will be used to assist staff in directing improvements throughout the life of the plan. See <u>Appendix B-2</u> for details regarding these surveys.

4. DuPage County Campus Survey: 2018

A separate survey was conducted covering sidewalk, crossings and pedestrian ways on the DuPage County campus. Surveys included all pedestrian facilities up to but not including building entryways or stairways leading to the entryways. Field inspections of sidewalk and curb ramps were done using the same techniques and factors employed in the survey of sidewalk in highway right of way. Graphics of the County Campus and pedestrian system are included in <u>Appendix C-3</u>.

To be compliant under PROWAG, features under each asset category must satisfy established criteria specific to each asset type and purpose. If one criteria of an asset is non-compliant, the asset technically does not meet accessibility requirements even though it may be substantially compliant and functional. For a list of factors and attainment criteria, see <u>Appendix B-2</u>.

Assessment of Assets

An assessment of the condition of the DuPage County assets that were evaluated can be found in <u>Appendix C-1</u> and maps and graphics for each category of asset can be found under <u>Appendix C-2</u>.



ACTION PLAN

The Action Plan is the process through which DuDOT will systematically make its public right of way facilities fully accessible to people with disabilities. Through the implementation of the Action Plan, DuDOT will eliminate barriers to accessibility for people with disabilities and improve mobility for all users of its pedestrian network. The Action Plan describes the policies and resources that the County will employ to bring the full network into compliance.

Important Factors in Pedestrian Accessibility Project Programming

The Division of Transportation will consider many factors when programming pedestrian accessibility projects. These factors, along with funding availability, will help DuDOT establish priority and immediacy of implementation. Key factors include:

- Locations where adjacent roadway or infrastructure improvements are programmed
- Locations with public facilities and high pedestrian traffic such as schools, parks, recreational facilities, and other public facilities
- Locations where nearby developments are home to, or frequently visited by, significant numbers of children, older adults, low income individuals, and people with disabilities
- Locations where there is a high degree of non-compliance with barriers to accessibility
- All other locations as resources and project scheduling present availability

Action Plan Scope

The scope of the Action Plan consists of a core set of activities that DuDOT will apply to remove accessibility barriers. Corrective actions to remove barriers to accessibility will be achieved through five overarching departmental activities:

Routine Maintenance - routine maintenance activities are small-scale repairs or improvements to existing facilities within DuPage County Division of Transportation right of way. These improvements include sidewalk repairs such as ramping, grinding and mudjacking, asphalt patching, and vegetation removal. Maintenance activities are relatively flexible and may be undertaken within the same construction year that they are determined to be necessary.

Capital Programming - the Capital Improvement Program (CIP) is the Division of Transportation's list of improvement projects that will take place over the next 5 years.⁸

- Capital Maintenance and Rehabilitation Projects these are large-scale maintenance projects performed on DuDOT assets and usually involve alterations that necessitate ADA improvements. These projects are often contracted through a third party and include pavement resurfacing or rehabilitation projects, traffic signal modernization, and sidewalk improvements. These projects are typically part of the annual DuDOT CIP.
- Capital Projects/New Construction these are projects that create or improve roadway assets within the public right of way. Projects such as adding lanes, widening and resurfacing, reconstruction, new traffic signal installation, and new sidewalk improvement projects that will significantly alter the character or capacity of DuDOT infrastructure. These projects are included in the annual CIP but are less frequent. These projects often involve alterations to the right of way or street and require ADA compliance.



Permitted Improvements - DuDOT has permitting authority within its public right of way. Permitted improvements are required to be ADA compliant and are reviewed by permitting staff for their compliance with PROWAG. In addition, DuDOT requires that new gaps or barriers are not created where they did not previously exist.

ADA Complaints - where complaints pertain to issues on DuDOT right of way, staff will assess and determine the appropriate corrective action. If the correction involves faulting, cracking, sidewalk surface degradation, curb ramp repair, and/or vegetation maintenance, these corrective actions will usually be handled by DuDOT Maintenance staff within normal budget. These projects will not appear in DuDOT's Capital Improvement Program (CIP). If necessary, corrections that are larger in scope will be programmed within the CIP.

DuPage Campus Improvements - improvements on the Campus will be implemented through two types of activities. DuDOT addresses pedestrian access route deficiencies on the Campus through its maintenance staff or through contracted projects for specific locations. Projects involving the Campus' system of ring roads and accompanying pedestrian walkways will be incorporated into DuDOT's CIP.

Action Plan Funding

As has been mentioned above, funding is a critical component for the improvement of accessible infrastructure. The DuPage County Division of Transportation is committed to a responsible program of improvements through its available funding mechanisms. These tools will be utilized to benefit accessibility whenever and wherever possible. It is expected that funding for accessible projects will be available through the following resources:

DuPage County Annual Capital Improvement Program - the annual CIP is funded mainly through DuPage County Local Motor Fuel Taxes and State Motor Fuel Tax allocations. These resources are utilized to fund operations, maintenance and capital projects in the DuDOT program and are also used to leverage federal and state grants for projects.

Federal and State Aid or Grants - the County regularly applies for and is awarded funding through programs such as the Surface Transportation Program (STP), Congestion Mitigation and Air Quality program (CMAQ), Illinois Transportation Enhancement Program (ITEP), the Transportation Alternatives Program (TAP), the Illinois Grade Crossing Protection Fund (IGCP), Highway Safety Improvement Program (HSIP).

Intergovernmental Agreements - DuPage County will occasionally enter into agreements with municipal agencies to fund the construction or maintenance of sidewalk facilities.



PLAN IMPLEMENTATION

As part of annual budgeting and DuDOT's 5-year programming process, DuDOT will identify projects, programs or initiatives that address "state of good repair," safety, system modernization and system expansion within available financial resources.

Barriers to accessibility will be assessed annually and addressed through the budgeting cycle. Barrier removal will be accomplished through one of the following budgeted activities: Routine maintenance, capital improvement program (CIP), or campus improvements. The CIP may include ADA projects as stand-alone or embedded projects (i.e., ADA improvements incorporated as an element in a larger capital roadway or bridge project). Annual and multi-year improvement programs will list specific capital projects that include ADA improvements.

Accessibility complaints that have been verified will be incorporated into the annual maintenance budget or capital improvement program (CIP) depending upon the scope and cost of the needed corrective action. Larger projects requiring engineering, land acquisition, environmental actions and funding will be entered into the CIP.

Repairs or improvements performed by DuDOT or another entity within DuDOT right of way will be designed in accordance with PROWAG and ADA standards in effect at that time.

Completed repairs or improvements will be inspected and documented for compliance. The Plan will be updated to reflect removal of barriers.

Monitoring and Updating the Plan

Throughout implementation of the Action Plan, DuDOT staff will review the Plan on an annual basis and update it periodically as standards and departmental policies and programs change. DuDOT staff, led by the ADA Coordinator, will address Plan progress and Plan modifications and will update the DuPage County website to provide residents information on progress toward full remediation.



ADA Coordinating Officials

The Division of Transportation's designated coordinating officials will be in charge of synchronizing the County's implementation focus area activities. The ADA Coordinator will be responsible for systematically resolving ADA complaints and ensuring that departmental activities are meeting the objectives of the Transition Plan. The designated **ADA Coordinator** for the DuPage County Division of Transportation is:

Senior Transportation Planner

DuPage County Division of Transportation 421 North County Farm Road, Room 2-300 Wheaton, IL 60187 630-407-6900

ADADOT@dupageco.org

A recommended best practice when the designated ADA Coordinator is not a senior staff member is to designate an Implementing Official. This individual is selected because he or she has a broader scope of responsibility, and can recommend policy or budget actions necessary to implement provisions of the ADA Transition Plan. The **Implementing Official** for the DuPage County Division of Transportation is:

County Engineer

DuPage County Division of Transportation 421 North County Farm Road, Room 2-300 Wheaton, IL 60187 630-407-6900

DOT@dupageco.org

Together, DuDOT's coordinating officials will ensure that the County responds systematically to comply with PROWAG in the County's public rights of way.



COMPLAINT PROCEDURE

The Americans with Disabilities Act of 1990 and the Rehabilitation Act of 1973 prohibit a public entity from discriminating against persons with disabilities in access to facilities and services that the public entity provides. If users of DuPage County facilities and services believe that the Division of Transportation has not provided reasonable accommodations in the public right of way, they have the right to file a complaint. The Division of Transportation has developed a complaint procedure for the purpose of the prompt and equitable resolution of citizens' complaints, concerns, comments, and other grievances (see <u>Appendix D</u> for forms and procedures).

Can I File a Complaint?

Under ADA, any person who believes that they have been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any DuDOT service, program, activity, or facility may file a complaint. A complaint may also be filed by a representative on behalf of such a person.

ADA Complaint Procedure

A complainant may file his or her complaint by using the *Americans with Disabilities Act Accessibility Complaint Form.* Official complaint forms may be submitted to the attention of the ADA Coordinator via postage or electronic mail (e-mail). Complaint forms may be obtained from the DuPage County website at www.dupageco.org/dot/ada, or in person at the Division of Transportation's administrative offices. Please see the previous section titled ADA Coordinating Officials for the appropriate contact information.

The DuPage County Division of Transportation will accept only formal complaints submitted to the ADA Coordinator at the contact information provided on page 13 of this document. The complainant will be required to submit a formal complaint using the form provided at the end of this document, or the digital form provided online.

1. Pedestrian Access Route Inquiry or Complaint

- DOT receives a complaint from the public about a segment of sidewalk. The ADA Coordinator will receive the complaint and enter it into a tracking system.
- ADA Coordinator notifies the Implementing Official of the ADA Complaint.
- If not ADA-related, complaint is treated as sidewalk request.

2. Jurisdictional Determination

- ADA Coordinator, to the best of their ability, determines location of the complaint. Using location description, Coordinator identifies the jurisdiction responsible for the complaint.
- If the complaint is determined to be within DuDOT jurisdiction, then Coordinator proceeds to verify the complaint. If the complaint is determined to not be within DuDOT jurisdiction, then Coordinator forwards the complaint to the appropriate jurisdiction.

3. Complaint Verification

 ADA Coordinator verifies the complaint through visual examination process. If determined to be necessary, Coordinator may obtain additional verification through an in-field meeting with the complainant.



• If the complaint can be verified, then the Coordinator proceeds to determine the mitigation strategy. If the complaint cannot be verified, then the Coordinator makes determination that there is No Finding.

4. Mitigation Determination

- In collaboration with the appropriate Division of Transportation staff, the ADA Coordinator determines the scope of what DuDOT's mitigation action should be. Coordinator will work with appropriate staff to determine the scope of the action.
- Coordinator may collaborate with the following staff to determine the scope of mitigation action to be undertaken: design engineering, construction engineering, traffic engineering, or permits.
- If the mitigation action is determined to be feasible, then the action is pursued.

5. Action

- If the mitigating action is determined to be a maintenance issue, the ADA Coordinator will work with maintenance staff to schedule the work.
- If the mitigation action is determined to e a repair or replacement issue, the Coordinator will work with the Implementing Official to add the action to DuDOT's CIP.

6. Finding and Response

- ADA Coordinator confirms with the Implementing Official that a Finding, or No Finding, has been generated and a Response will be sent to the complainant.
- ADA Coordinator sends final Response to the complainant.

Complaint Processing

The DuPage County Division of Transportation will acknowledge complaints received. If the complaint filed does not concern a County-owned facility, the complainant will be notified of the proper jurisdiction.

Within 30 calendar days of receipt, the County will complete an investigation to determine the appropriate actions required to address a complaint.

The conclusion of the County's investigation will generate a finding and, if applicable, the action to be accomplished.

Accordingly, the finding by DuPage County's Division of Transportation of any one complaint does not constitute a precedent upon which the County is bound, or upon which other complaining parties may rely. A finding by the Division of Transportation will identify the actions that DuDOT will undertake to mitigate accessibility barriers. Actions as a result of a finding may or may not be able to be mitigated immediately, depending on the scope of the complaint.



GLOSSARY

Accessible (Audible) Pedestrian Signal: a signal actuation device that provides an audible message for a walk phase.

Accessible Route: a continuous, unobstructed path connecting all accessible elements and spaces including public transportation facilities, parking access aisles, curb ramps, crosswalks at vehicular ways, walks, ramps and lifts.

ADA: means and refers to the Americans with Disabilities Act as contained and explained in Title 42, Chapter 126 of the United States Code. The 1990 law that protects people with disabilities against discrimination. When this law is applied to public facilities, it means that failure to provide adequate accommodations for people with disabilities is considered discrimination.

ADAAG: Americans with Disabilities Act Accessibility Guidelines, codified at Appendix A to 28 Code of Federal Regulations Part 36 and at Appendix A to 49 Code of Federal Regulations part 37.

Auxiliary Aids and Services: services and devices promoting effective communication or allowing access to goods and services as defined by Titles II and III of the ADA.

Barrier to Accessibility: generally, an obstruction in the pedestrian access route that prohibits safe passage for a person with a disability.

Complaint (Grievance) Procedure: a process through which an individual may file an official complaint related to ADA accommodations within the public right of way. See Appendix D for DuPage County's complaint procedure for Division of Transportation rights of way.

Cross Slope: a lateral measure of how level a sidewalk or curb ramp is. It is expressed both in a percentage and a ratio of rise length to running length. The maximum cross slope of a sidewalk, curb ramp, or landing may not exceed 2%.

Curb: an element of the roadway. A curb is a stone or concrete edging to a street or path.

Curb Ramp: an element of the pedestrian access route. A curb ramp provides a path for pedestrians and people with mobility aids to safely cross the curb.

Detectable Warning: truncated domes, typically pre fabricated and installed or stamped into a walkway, providing a tactile surface at the transition from a curb and the street or other hazardous vehicular crossings, assisting pedestrians with vision disabilities in determining when they enter the street.

Disability: a physical or mental impairment substantially limiting one or more of the major life activities of an individual as defined by the ADA.

Grade (Running) Slope: a longitudinal measure of how steep a sidewalk or curb ramp is. It is expressed both in a percentage and a ratio of rise length to running length. The maximum grade slope of a curb ramp may not exceed 8.33%. In general, the maximum grade slope of a sidewalk may not exceed the grade slope of the adjacent roadway.

Gutter Slope: a longitudinal measure of how steep the street side of a gutter is. It is expressed both in a percentage and a ratio of rise length to running length.



Impairment – any physiological disorder, or condition, cosmetic disfigurement, or anatomical loss affecting one or more body systems or any mental or psychological disorder, such as organic brain syndrome, emotional or mental illness, and specific learning disabilities.

Landing: a clear, level location for a person using a mobility aid to maneuver. Landings at the top of a curb ramp may not exceed a maximum cross slope of 2%.

Maximum Extent Practicable or Feasible: this term refers to certain situations where an existing facility is being altered and full compliance may not be possible given the scope of the project. Where accessibility requirements cannot be fully met, measures will be taken to improve the facility to the maximum extent that is practicable, and the remaining obstacle will be documented for corrective action in the future.⁹

Obstruction: an obstruction is a type of barrier to accessibility. Generally, it is an object or installation that is impeding pedestrians or mobility aid users in the pedestrian access route.

Pedestrian Access Route (PAR): a continuous, safe route of passage for pedestrians that must remain free of barriers to accessibility. A PAR may not be less than four feet in width.

Pedestrian Push Button: a traffic signal actuation device that provides a walk phase for safe crossings at signalized intersections.

Pedestrian Rights-of-Way: sidewalks, curb ramps, crosswalks serving such sidewalks, and any other designated routes or pathways used by pedestrians along public rights of way.

PROWAG: Proposed Guidelines for Pedestrian Facilities in the Public Right-of-Way. At the time of this Initial Plan the most current version of the PROWAG is the 2011 Proposed Guidelines for Pedestrian Facilities in the Public Right-of-Way published by the United States Access Board. This document provides guidelines for public rights-of-way addressing various issues, including access for blind pedestrians at street crossings, wheelchair access to on-street parking, and various constraints posed by space limitations, roadway design practices, slope, and terrain.

Public Right of Way: public land that is reserved for transportation purposes. In the context of an ADA transition plan, the public right of way is a transportation corridor that contains elements such as sidewalks, curb ramps, traffic signals, and crosswalks that are intended to provide safe passage to pedestrians.

Reasonable Accommodation: changes or adjustments providing, without undue burden, means for an individual with a disability to perform the duties or tasks required. Where existing physical constraints make it impractical for altered elements, spaces, or facilities to fully comply with new construction requirements, compliance is required to the extent practicable within the scope of the project. Existing physical constraints include, but are not limited to, underlying terrain, right-of-way availability, underground structures, adjacent developed facilities, drainage, or the presence of a notable natural or historic feature. See 2011 PROWAG and 28 C.F.R. §35.130(b)(7).

Sidewalk: a paved path for pedestrians at the side of a road. Generally, made of concrete.Curb ramp data was compiled and classified according to a rating system modeled after IDOT's self-evaluation methodology.





Outreach Targets

Invitations for comments on the Transition Plan and for attendance of the two public meetings were sent to 34 organizations that serve people with disabilities in DuPage County. In addition, invitations were distributed to DuPage's 34 municipalities through the DuPage Mayors and Managers Conference (DMMC). Below is a list of the non-municipal organizations who were invited:

Access DuPage	Easter Seals DuPage and Fox Valley Region
AIM Center for Independent Living	Helping Hand Rehab Center
Catholic Charities	Illinois Planning Council on Developmental Disabilities
Center for Speech and Language Disorders	Kids Teen Rider
Center on Deafness	Little City Foundation
Chicago Lighthouse	Little Friends, Inc.
College of DuPage	Marianjoy Rehabilitation Hospital
Community Access Naperville	NAMI of DuPage County
Community Support Services	Northeastern Illinois Area Agency on Aging
Connection of Friends	Pace Suburban Bus
DuPage County Care Center	Parents Alliance Employment Project
DayONE PACT, Inc.	People's Resource Center
Donka, Incorporated	Philip J. Rock Center and School
DuPage Housing Authority	Ray Graham Association
DuPage Mayors and Managers Conference	Spectrios Institute for Low Vision
DuPage Pads	Turning Pointe Autism Foundation
DuPage United	United Cerebral Palsy Seguin of Greater Chicago

Comments

Organization	Date	Medium	Comment
The Chicago Lighthouse	12/16/2019	Electronic Mail	My only comment is about Accessible Pedestrian Signals.
			I believe they should be installed when ever new construction takes place or when upgrades are made to an intersection.
Little Friends, Inc.	1/6/2020	Electronic Mail	I have reviewed the plan and connected with the City of Naperville given I serve as Chair of the Advisory Commission on Disabilities. No one had any issues or concerns with the plan submitted by the County.

Changes Made in Response to Comments

All traffic signals that will be newly constructed or replaced will include accessible pedestrian signal (APS) technology. Contingent upon the nature or extent of traffic signal modifications, APS technology will be added to future traffic signal modification projects. The Division of Transportation will follow prevailing best practice design guidelines when implementing APS technology.

Public Meeting Materials

Public Meeting Invitation

DUPAGECOUNTY

DIVISION OF TRANSPORTATION

NOTICE OF PUBLIC MEETING ADA TRANSITION PLAN FOR DUPAGE COUNTY ROADWAYS

Tuesday, December 17th 2019 4:00 - 7:00 PM

> Addison Village Hall 1 Friendship Plaza Addison, Illinois 60101

Tuesday, January 7th 2020 4:00 - 7:00 PM

PowerForward DuPage 28600 Bella Vista Parkway Warrenville, Illinois 60555

Details

- Learn about the Division of Transportation and its Americans with Disabilities Act (ADA) Transition Plan for DuPage County roadways
- Provide the County with feedback on the Transition Plan
- Provide feedback on how the County should prioritize investments to ensure accessibility
- Learn how you can be a part of the Plan process

Additional Accommodations

The Division of Transportation is committed to accessibility and compliance with the Americans with Disabilities Act. If you anticipate needing specific accommodations or have questions about the physical access provided, please contact Sidney Kenyon (630-407-6900 or ADADOT@dupageco.org). Requests for accommodations must be received by one week prior to the date of the public meeting.

Visit www.dupageco.org/dot/ada to learn more

DuPage County Division of Transportation

421 N. County Farm Road #2-300 Wheaton, IL 60187 Phone: (630) 407-6900 Email: ADADOT@dupageco.org

WHAT IS AN ADA TRANSITION PLAN?



DUPAGE COUNTY

Americans with Disabilities Act (ADA)

The Americans with Disabilities Act, also known as ADA, protects people with disabilities from discrimination. Pursuant to that law, all public facilities at every administrative level are mandated to be physically accessible to all people with disabilities. ADA is comprised of five titles:

Title I: Employment

Title II: Public Entities

Title III: Public Accommodations

Title IV: Telecommunications

Title V: Miscellaneous Provisions

Title II establishes the steps that state and local governments must take to make public transportation facilities accessible to people with disabilities. Each government agency is responsible for implementation of accessible facility design standards. For facilities in the public right of way, the federal guidelines that governments must follow stem from the Proposed Right of Way Accessibility Guidelines, also known as PROWAG.

Proposed Right of Way Accessibility Guidelines (PROWAG)

PROWAG refers to the federal design guidelines for pedestrian facilities in the public right of way. The categories of facilities that are subject to PROWAG include, but are not limited to:

Sidewalks

Curb Ramps Detectable Warnings Traffic Signal Infrastructure Traffic Signal Pedestrian Pushbuttons

As time goes on, accessibility design guidelines evolve. As a result, existing facilities that met standards in prior years must be improved or replaced to meet updated PROWAG standards. In order to keep up with new design guidance, governments must make actionable plans to bring existing facilities into compliance.

ADA Transition Plan

The purpose of an ADA transition plan is to demonstrate the ways in which a government agency will commit resources to making improvements that bring right of way facilities into compliance with PROWAG. Because improvements to those facilities may take time to program, engineer, and construct, a transition plan sets the agenda for how those activities will be prioritized.

Elements of a Transition Plan

Per ADA law, an ADA transition plan must contain the following elements:

Self-Evaluation of Existing Facilities

A detailed evaluation of existing pedestrian facilities, identifying which facilities are compliant and non-compliant with PROWAG.

Plan to Correct Barriers to Accessibility

The steps that a government agency will take to correct non-compliant facilities and eliminate barriers to accessibility on the pedestrian network. The Division of Transportation has developed an Action Plan that fulfills this requirement.

Procedures for Monitoring the Plan

The steps that a government agency will take to monitor implementation of the plan. The Division of Transportation will regularly update its transition plan with new findings and corrections as they are implemented.

Designation of ADA Coordinating Officials

The officials who will be responsible for overseeing implementation of an action plan. The Division of Transportation has identified an ADA Coordinator and an Implementing Official who will work together to implement the DOT's Action Plan.

Development of a Grievance Procedure

A procedure for dealing with ADA-specific complaints about non-compliant pedestrian facilities in the public right of way. The Division of Transportation has developed a Complaint Procedure to address those types of grievances.

Summary of Public Engagement

A summary of how the general public was consulted during the planning process.

SUMMARY OF OUR SELF EVALUATION



DUPAGE COUNTY



The self evaluation is the process by which the Division of Transportation staff assessed the compliance of its public facilities with PROWAG standards. The types of standards that are required include the running slopes and cross slopes of pedestrian walkways, maximum reach distances, and where detectable warnings must be placed.

The self evaluation process is the foundation of a transition plan. In order to effectively plan and program for corrections to non-compliant facilities, the extent to which some pedestrian facilities are non-compliant must be known.

Elements of Our Self Evaluation

The self evaluation process took place over the course of three years. The data collection phase, which included all field and office-based surveys, invovled four survey efforts carried out by County staff:

Signalized Intersection Ramps

1,905 curb ramps at signalized intersections were directly surveyed by engineering staff using a standardized field survey.

Pedestrian Signals and Accessibility

330 of 343 signalized intersections under County jurisdiction were surveyed throughout the roadway network using a combination of field and remote survey efforts.

Sidewalk Conditions Assessment

Staff surveyed almost all 200 miles of sidewalk on County highways, with the exception of locations undergoing construction or maintenance activities at that time.

DuPage County Campus Survey

Staff surveyed sidewalks, crossings, and pedestrian ways on the DuPage County campus.



Each assessment involved different components of the pedestrian network. Components were scored on the basis of compliance with PROWAG standards, and consistent with the State of Illinois' scoring methodology.

Curb Ramps Criteria

Intersection curb ramps were assessed using 24 criteria that were developed by the Illinois Department of Transportation. Those metrics were adapted and applied to the County roadway network by DuPage County DOT (DuDOT) staff.

Sidewalk Network Criteria

Sidewalk facilities were assessed using a combination of qualitative and categorical criteria. The qualitative criteria summarize the overall condition of the sidewalk through a "Good," "Fair," or "Poor" rating. Similar to curb ramps, the sidewalks were assessed using 24 evaluation metrics that were developed by the Illinois Department of Transportation.

Pedestrian Signal Assessment Criteria

The pedestrian signal assessment was broken down into 10 evaluation criteria. Those ten metrics recorded push button types, push button obstructions, the number of push buttons present, and the number of pedestrian signal heads at each surveyed intersection.

County Campus Criteria

The assessment on the County Campus recorded 15 criteria for sidewalks and curb ramps throughout the property. No traffic signals were assessed because none are present on the entirety of the County's campus property.

DUPAGE BY THE NUMBERS

Highway Centerline Miles **220**

Sidewalk Miles

200

Signalized Intersections

343

Unsignalized Intersections

1,160 ^{Bridges} 49



OVERVIEW **SIDEWALKS**



DUPAGE COUNTY

DuPage County Sidewalk Network: North



DuPage County Sidewalk Network: South



MARAMENT SHI MARKATIN Y

- ADA Sidewalk Condition
- ----- Good Fair
- Poor

Legend Major Roads by Jurisdiction

- DuPage County Highways
- Illinois Dept of Trans (IDOT) Highways
- - Municipal and Township Roads

OVERVIEW CURB RAMPS

COUNTY OF DUPAGE

DUPAGE COUNTY

Legend

DuPage County Curb Ramps: North



DuPage County Curb Ramps: South



Curb Ramp Condition

- Compliant curb ramp 1-2 elements in violation, mostly compliant
- More than 2 elements in violation, mostly compliant
- Missing curb ramp where warranted
- **Construction Status**
- New or Reconstructed Ramps since 2016* (*Not including midblock curb ramps)

Major Roads by Jurisdiction

- DuPage County Highways
- Illinois Dept of Trans (IDOT) Highways
- Illinois Tollways
- Municipal and Township Roads

OVERVIEW TRAFFIC SIGNALS



DUPAGE COUNTY

DuPage County Signal Accessibility: North



DuPage County Signal Accessibility: South



Legend Pedestrian Push Button Condition DuPage County Highwa

Obstructions Present

Under Construction

No Obstructions

DuPage County Highways Illinois Dept of Trans (IbOT) Highways Illinois Tollways



DESIGNING AN ACCESSIBLE LANDSCAPE



DUPAGE COUNTY



ACTION PLAN TYPICAL COSTS*



DUPAGE COUNTY



ACTION PLAN PROGRAM SCOPE



DUPAGE COUNTY



The Capital Improvement Program (CIP) is the Division of Transportation's list of improvement projects that will take place over the next five years. ADA improvements will take place under two types of programmed activities:

Capital Maintenance and Rehabilitation

These are large-scale maintenance projects performed on County roadways. These projects are often contracted through a third party and include pavement resurfacing, traffic signal modernization, and sidewalk improvements.

Capital Projects/New Construction

These are projects that create or improve roadway assets on County roadways. These types of projects include adding lanes, widening and resurfacing roads, roadway reconstruction, new traffic signal installation, and new sidewalk construction projects. Capital projects often involve alterations to the right of way and require adherence to PROWAG guidelines.

ADA Complaints

Where complaints pertain to issues on County roadways, staff will assess and determine the appropriate corrective action. If the correction involves faulting, cracking, sidewalk surface degradation, curb ramp repair, and/or vegetation maintenance, those corrective actions will usually be handled by DuDOT maintenance staff. If necessary, corrections that are larger in scope will be programmed within the CIP.

DuPage Campus Improvements

Improvements on the Campus will be implemented through two types of activities. DuDOT addresses pedestrian access route deficience on the Campus through its maintenance staff or through contracted projects for specific locations. Projects involving the Campus' system of ring roads and accompanying pedestrian walkways will be incorporated into DuDOT's CIP.

Routine Maintenance

Routine maintenance activities are small-scale repairs or improvements to existing facilities. Maintenance activites are relatively flexible and can be undertaken within the same construction year that they are deemed necessary. Some examples of routine maintenance activities include:

Ramping or Grinding

Sidewalk ramping and grinding are maintenance activities that temporarily add to or cut sidewalks in order to correct vertical misalignments between sidewalk panels.

Mudjacking

The term "mudjacking" refers to injecting soil mixtures underneath concrete sidewalk slabs to raise or level them, which can correct sidewalk grade slopes or cross slopes.

Asphalt Patching

Patching of asphalt, typically carried out on roadways, can correct pavement degradation within crosswalks and at streetside approaches to curb ramps.

Vegetation Removal

Maintenance staff can remove vegetation obstructions in the right of way such as overhanging branches or encroaching brush.

Permitted Improvements

DuDOT has permitting authority within its public right of way. Permitted improvements or connections are required to be ADA compliant and are reviewed by permitting staff for their adherence to PROWAG. In addition, DuDOT staff require that new gaps or barriers are not created where they did not previously exist.



COMPLAINT PROCEDURE HOW THE PROCESS WORKS



DUPAGE COUNTY



BARRIERS TO ACCESSIBILITY EXAMPLES



DUPAGE COUNTY



Mailbox in the Pedestrian Access Route (PAR)



Sidewalk Faulting



Fire Hydrant in PAR



Vegetation Obstructions



Severe Cracking with Faulting



Excessive Driveway Cross Slope



Crosswalk with No Receiving Curb Ramp



Inaccessible Pedestrian Push Button



Poor Curb Transition and No Detectable Warning



Unfinished or Deteriorated Sidewalk





TRANSITION PLAN COMMON TERMINOLOGY



DUPAGE COUNTY

Accessible (Audible) Pedestrian Signal: a signal actuation device that provides an audible message for a walk phase.

Accessible Route: a continuous, unobstructed path connecting all accessible elements and spaces including public transportation facilities, parking access aisles, curb ramps, crosswalks at vehicular ways, walks, ramps and lifts.

ADA: means and refers to the Americans with Disabilities Act as contained and explained in Title 42, Chapter 126 of the United States Code. The 1990 law that protects people with disabilities against discrimination. When this law is applied to public facilities, it means that failure to provide adequate accommodations for people with disabilities is considered discrimination.

Auxiliary Aids and Services: services and devices promoting effective communication or allowing access to goods and services as defined by Titles II and III of the ADA.

Barrier to Accessibility: generally, an obstruction in the pedestrian access route that prohibits safe passage for a person with a disability.

Complaint (Grievance) Procedure: a process through which an individual may file an official complaint related to ADA accommodations within the public right of way.

Cross Slope: a lateral measure of how level a sidewalk or curb ramp is. It is expressed both in a percentage and a ratio of rise length to running length. The maximum cross slope of a sidewalk, curb ramp, or landing may not exceed 2%.

Curb: an element of the roadway. A curb is a stone or concrete edging to a street or path.

Curb Ramp: an element of the pedestrian access route. A curb ramp provides a path for pedestrians and people with mobility aids to safely cross the curb.

Detectable Warning: truncated domes, typically pre-fabricated and installed or stamped into a walkway, providing a tactile surface at the transition from a curb and the street or other hazardous vehicular crossings, assisting pedestrians with vision disabilities in determining when they enter the street.

Disability: a physical or mental impairment substantially limiting one or more of the major life activities of an individual as defined by the ADA.

Grade (Running) Slope: a longitudinal measure of how steep a sidewalk or curb ramp is. It is expressed both in a percentage and a ratio of rise length to running length. The maximum grade slope of a curb ramp may not exceed 8.33%. In general, the maximum grade slope of a sidewalk may not exceed the grade slope of the adjacent roadway.

Gutter Slope: a longitudinal measure of how steep the street side of a gutter is. It is expressed both in a percentage and a ratio of rise length to running length.

Impairment: any physiological disorder, or condition, cosmetic disfigurement, or anatomical loss affecting one or more body systems or any mental or psychological disorder, such as organic brain syndrome, emotional or mental illness, and specific learning disabilities.

Landing: a clear, level location for a person using a mobility aid to maneuver. Landings at the top of a curb ramp may not exceed a maximum cross slope of 2%.

Obstruction: an obstruction is a type of barrier to accessibility. Generally, it is an object or installation that is impeding pedestrians or mobility aid users in the pedestrian access route.

Pedestrian Access Route (PAR): a continuous, safe route of passage for pedestrians that must remain free of barriers to accessibility. A PAR may not be less than four feet in width.

Pedestrian Push Button: a traffic signal actuation device that provides a walk phase for safe crossings at signalized intersections.

Pedestrian Rights-of-Way: sidewalks, curb ramps, crosswalks serving such sidewalks, and any other designated routes or pathways used by pedestrians along public rights of way.

PROWAG: Proposed Guidelines for Pedestrian Facilities in the Public Right-of-Way. At the time of this Initial Plan the most current version of the PROWAG is the 2011 Proposed Guidelines for Pedestrian Facilities in the Public Right-of-Way published by the United States Access Board. This document provides guidelines for public rights-of-way addressing various issues, including access for blind pedestrians at street crossings, wheelchair access to on-street parking, and various constraints posed by space limitations, roadway design practices, slope, and terrain.

Public Right of Way: public land that is reserved for transportation purposes. In the context of an ADA transition plan, the public right of way is a transportation corridor that contains elements such as sidewalks, curb ramps, traffic signals, and crosswalks that are intended to provide safe passage to pedestrians.

Reasonable Accommodation: changes or adjustments providing, without undue burden, means for an individual with a disability to perform the duties or tasks required. Where existing physical constraints make it impractical for altered elements, spaces, or facilities to fully comply with new construction requirements, compliance is required to the extent practicable within the scope of the project. Existing physical constraints include, but are not limited to, underlying terrain, right-of-way availability, underground structures, adjacent developed facilities, drainage, or the presence of a notable natural or historic feature. See 2011 PROWAG and 28 C.F.R. §35.130(b)(7).

Sidewalk: a paved path for pedestrians at the side of a road. Generally, made of concrete.Curb ramp data was compiled and classified according to a rating system modeled after IDOT's self-evaluation methodology.
APPENDIX B-1 Barriers to Accessibility: Examples

The following is a brief visual aid with examples of barriers to accessibility.



Mailbox in Pedestrian Access Route (PAR)

Sidewalk Faulting



Vegetation Obstructions



Fire Hydrant in PAR



Crosswalk with No Curb Ramp



Poor Curb Transition & No Detectable Warning



Excessive Driveway Cross-slope



Severe Cracking with Faulting



Inaccessible Pedestrian Crossing Button









Sidewalk and Curb Ramp Evaluation Criteria

The Americans with Disabilities Act of 1990 and the Rehabilitation Act of 1973 prohibit a public entity from discriminating against persons with disabilities in access to facilities and services that the public entity provides. If users of DuPage County facilities and services believe that the Division of Transportation has not provided reasonable accommodations in the public right of way, they have the right to file a complaint. The Division of Transportation has developed a complaint procedure for the purpose of the prompt and equitable resolution of citizens' complaints, concerns, comments, and other grievances (see Appendix E for forms and procedures).

Sidewalk evaluation criteria were developed by DuDOT. Factors that evaluated sidewalk physical condition were largely derived from PROWAG criteria and reflect the compliance of a given segment of sidewalk to those PROWAG standards.

For more information about the IDOT ADA Transition Plan, follow this link to IDOT's public web portal: <u>http://idot.illinois.gov/about-idot/civil-rights/ADA-and-Accessibility</u>.

Curb Ramp Criteria Data Dictionary

Curb ramps were assessed using a comprehensive set of 24 evaluation criteria metrics. Altogether, these metrics fulfill PROWAG requirements and allow DuDOT to address specific non-compliance issues. Each metric listed below names the dimension and carries a short description:

- Ramp Location (2 factors): what is the location of the ramp relative to the intersection?
- Sidewalk Connection: is there a sidewalk leading to the corner?
- Detectable Warning: is there a detectable warning present?
- Detectable Warning Placement: is the detectable warning properly placed?
- Detectable Warning Condition: is the detectable warning in good condition?
- Detectable Warning Color: does the detectable warning provide adequate contrast?
- **Curb Ramp Flares**: if there is concrete or another walking surface adjacent to the sides of the curb ramp, does the ramp itself have side flares?
- Flare Slope: what is the maximum slope of the curb ramp flares?
- **Curb Ramp Within Crosswalk**: if there is a marked crosswalk, is the curb ramp contained within the crosswalk?
- Transition Vertical Profile: are all slope transitions flush and level?
- **Space at Bottom of the Ramp**: is a minimum clear space of 4' x 4' provided at the bottom of the ramp?
- **Space at Top of the Ramp**: is a minimum turning space of 4' x 4' provided at the top of the ramp?
- **Top Space Slope**: is the maximum cross slope of the turning space less than or equal to 2 percent?
- **Curb Ramp Width**: is the minimum width of the curb ramp greater than or equal to 48 inches?

- Curb Ramp Cross Slope: is the curb ramp cross slope less than or equal to 2 percent?
- Curb Ramp Max Cross Slope: what is the maximum cross slope of the curb ramp?
- Curb Ramp Grade Slope: is the curb ramp grade slope less than or equal to 8.3 percent?
- Curb Ramp Max Grade Slope: what is the maximum grade slope of the curb ramp?
- **Curb Ramp Gutter:** is the maximum curb ramp gutter slope less than or equal to 5 percent?
- **Sidewalk Width:** is the maximum width of the adjacent sidewalk greater than or equal to 48 inches?
- **Sidewalk Cross Slope:** is the maximum cross slope of the adjacent sidewalk less than or equal to 2 percent?
- **Sidewalk Grade Slope:** is the maximum grade slope of the adjacent sidewalk less than or equal to the adjacent roadway grade, or less than or equal to 5 percent?
- **Curb Ramp Surface:** is the surface or any vertical discontinuity of the curb ramp compliant?
- **Curb Ramp Condition Rating:** according to the State of Illinois Curb Ramp Condition Rating system, on a scale of 1 through 4 what is the condition of the curb ramp?



Curb Ramp Data Collection Tablet Application

Sidewalk Criteria Data Dictionary

Curb ramps were assessed using a comprehensive set of 24 evaluation criteria metrics. Altogether, these metrics fulfill PROWAG requirements and allow DuDOT to address specific non-compliance issues. Each metric listed below names the dimension and carries a short description:

- Cracking: does the sidewalk panel or segment exhibit substantial cracking?
- **Sidewalk Faulting**: is there greater than one-quarter of an inch of vertical difference between sidewalk panels?
- **Sidewalk Grade Slope**: is the maximum grade slope of the sidewalk panel or segment less than the roadway grade, or less than or equal to 5 percent?
- **Sidewalk Cross Slope**: is the maximum cross slope of the sidewalk panel or segment less than or equal to 2 percent?
- **Obstructions (3 factors)**: are there obstructions in the pedestrian access route that reduce the passable width of the sidewalk to less than 4 feet?
- **Sidewalk Island Issues**: does the sidewalk island lack a traversable ramp to cross the curb, or is it an otherwise impassible obstacle to a wheelchair user?



Sidewalk Condition Assessment Data Collection Tablet Application

Traffic Signal Pedestrian Pushbutton Data Dictionary

Pedestrian pushbuttons and pedestrian signal heads were assessed at each location where present. Staff were principally concerned with pushbutton location, pushbutton type, and compliance with PROWAG accessibility. In general, guidelines suggest that accessibility is multi-dimensional: pedestrian pushbuttons must be accessible to people in wheelchairs; they must be within reach and cannot be obstructed; and there must be audible warnings for people with low vision. The following metrics describe DuDOT field data:

- **Pedestrian Buttons in Quadrant**: how many pedestrian pushbuttons are located in each quadrant of each signalized intersection?
- Pedestrian Poles (PP): how many pedestrian poles are installed at each intersection?
 - Obstruction types were recorded. The following are the types of obstructions found:
 - Reach: pedestrian pushbutton exceeds the standard acceptable reach criteria; this category also includes locations where a sidewalk pad or panel needs to be installed to allow a person to approach the pedestrian button. A reach barrier could also include cases where the pushbutton is located on the opposite of a pole from the pedestrian approach. These locations were annotated and DuDOT will attempt to relocate the buttons to an accessible position on the post.
 - **Obstructed**: this category of barrier includes cases where some other equipment in the right of way (e.g., traffic signal posts, signal cabinet, sign or other permanent fixture) obstructs the path to the pedestrian pushbutton.
 - **Distance from Crosswalk**: PROWAG recommends a maximum distance between the pushbutton and the crosswalk. This metric records those locations exceeding that distance.
 - **No Crosswalk or Ramp**: This factor registers those locations with an active ped pushbutton that are not accompanied by a crosswalk and/or curb ramp.
 - **No Pushbutton**: This factor registers those locations with a crosswalk and/or curb ramp that are NOT accompanied by a ped pushbutton.
 - **No Button**: Locations without a pushbutton where one may be warranted are recorded.
- **Type of Pedestrian Pushbutton**: what type of pedestrian pushbutton is present at this intersection?
 - This category identifies pedestrian pushbuttons that are no longer compliant with PROWAG standards.
- **Number of Pedestrian Signal Heads**: how many pedestrian signal heads are present at this intersection?
 - This measure helps to identify locations where pedestrian signal heads need to be installed.

Campus Survey Data Dictionary

The survey that was undertaken for the County Campus evaluated sidewalks and curb ramps against the same basic elements of compliance as the sidewalk network survey along the DuPage County highways. However, the Campus survey focused on the location and severity of sidewalk issues as well as the basic compliance measures for curb ramps. No traffic signals were included as a part of this survey, as there are no traffic signals that are located entirely within the County Campus' property. The following metrics describe County Campus' field data:

- Sidewalk Issues
 - Issue Type: what type of issue or deficiency was observed?
 - Issues identified included cracking, excessive cross slope, excessive grade slope, faulting, and physical obstructions.
 - **Fault Size** (when applicable)
 - Issue Notes
- Curb Ramps
 - Surface Condition: how degraded is the condition of the curb ramp overall?
 - Measured as Good, Fair, or Poor. Poor ratings indicate that a curb ramp's surface condition is quite degraded and needs replacement.
 - Detectable Warning
 - **Presence**: is there a detectable warning?
 - Surface Condition: how degraded is the condition of the detectable warning?
 - Grade Slope: does the curb ramp satisfy the grade slope requirement?
 - Cross Slope: does the curb ramp satisfy the cross slope requirement?
 - Width (inches): does the landing satisfy the width requirement?
 - Ramp Flares
 - Presence: does the curb ramp feature ramp flares?
 - Flare Slope: if ramp flares are featured, do they satisfy the slope requirement?
 - Landings
 - Presence: is the landing present and sufficiently close to the ramp?
 - Slope: does the landing satisfy the cross slope requirement?
 - Width (inches): does the landing satisfy the width requirement?
 - Gutter Slope: does the gutter slope satisfy the slope requirement?

APPENDIX C-1 Self-Evaluation Results

DuPage County's self-evaluation process evaluates facilities in relation to the 2011 PROWAG standards. Many DuDOT facilities, however, were constructed or installed many years prior to the current PROWAG Guidelines when there were different design or component standards. As standards have evolved over time, DuDOT has adapted its designs to conform with the standards in effect at that time.

Curb Ramp Assessment

Curb ramp data was compiled and classified according to a rating system modeled after IDOT's self-evaluation methodology. Appendix B-2 describes the ramp evaluation criteria. Any element that does not comply results in a non-compliant rating relative to the 2011 PROWAG standards.

The curb ramp assessment included a total of 1,905 curb ramps at signalized intersections. The DuDOT curb ramp inventory demonstrates that 6% of curb ramps on the system are completely compliant with standards.¹⁰ Another 25% of ramps have only 1 or 2 non-compliant elements. In this category, detectable warning non-compliance occurs in about 25% of these cases and ramp cross slope and grade slope are non-compliant in about 20% of this group. Approximately 66% have more than 2 elements that are non-compliant and 3% of quadrants are missing ramps. Appendix C-2 includes details on curb ramp compliance by location.

Sidewalk Condition

DuDOT staff collected information on each segment of sidewalk and later classified each sidewalk segment into one of three qualitative categories: Good, Fair or Poor. Those ratings were dependent upon the frequency and severity of the issues in a section. Based on these surveys, the DuDOT sidewalk network is predominantly in good to fair condition (93%). Seven percent (7%) of the system was classified as poor. In these cases, segments generally failed because of non-compliance with cross-slope, running slope, obstructions in the pedestrian access route and faulting throughout the segment.

Other issues include sidewalk transitions and fixed object obstructions. DuDOT surveyed over 1,800 locations where detectable warnings (at signalized and unsignalized crossings) do not exist or are not to present standard.¹¹ In addition, there were over 1,100 locations where plants, shrubs and trees present obstructions due to encroachment onto the sidewalk or overhanging branches. DuDOT maintenance staff perform routine maintenance on vegetation encroachment. Surveys also revealed over 200 locations where utility pole, traffic signal pole, sign post, mailbox or utility valves were classified as obstructions within the pedestrian access route.

Pedestrian Signals and Accessibility

DuDOT intersections are equipped with pedestrian push buttons to assist with crossings. DuPage staff surveyed a total of 1,507 pedestrian buttons at 330 intersections. Thirteen (13) intersection locations were not surveyed due to construction activities.

More than half of all pedestrian buttons surveyed meet all physical accessibility standards. The remainder of the buttons do not meet ADA standards because of obstructions, missing sidewalk pads or placement of buttons.

At the time of this document, the County is responsible for five intersections that are equipped with audible pedestrian signal (APS) buttons. APS buttons are integrated devices that communicate information about the WALK and DON'T WALK intervals at signalized intersections in non-visual formats.¹³ A great majority of the DuDOT traffic and pedestrian signals were installed prior to the new PROWAG and MUTCD recommended policy on audible systems.

In addition to the push button assessment, pedestrian signal heads were inventoried. A total of 2,013 pedestrian signal heads were identified through the survey process. DuDOT continues to replace older WALK/DON'T WALK two faced signals with single faced countdown signals which enhance safety for pedestrians and drivers. DuDOT will add these and audible pedestrian signals to County-owned traffic signals as intersections are altered or improved.

DuPage County Campus

DuDOT has maintenance responsibility for the Campus transportation facilities including sidewalks, multi-use paths, curb ramps, and pavement. DuPage County Facilities Management is responsible for accessible facilities in the interiors of the County's buildings and parking garages. Therefore, the scope of the DuDOT Transition Plan focuses exclusively on 3.6 miles of outdoor pedestrian facilities.¹²

Located on 180 acres at the western edge of Wheaton, Illinois, most of the County's departments are housed among sixteen distinct buildings. With the County Campus serving as host for a variety of services for people with disabilities, special attention was paid to crossings on the Campus' access roads, transitions between pedestrian access routes and surface parking lots and pedestrian access routes between buildings.

Like DuDOT assessments for its roadway network, the Campus survey assessed ramps for their compliance with PROWAG guidelines and rated them in accordance with IDOT's compliance ratings.

The Campus assessment revealed that the majority of curb ramps were either mostly or totally compliant. None of the curb ramps surveyed were totally non-compliant.

Of the thirty-five sidewalk faults that were reported, only six were greater than one inch in height; the majority were under one half of an inch.

For more details regarding ADA accessibility on the DuPage County campus, please refer to Appendix C-3.





County Sidewalk

County Highways

Miles

3

0 0.5 1

2



Overview of Surveyed Sidewalk Condition - Northwest DuPage

Legend Dupage County DOT Sidewalk Conditon 2018 Good Fair Poor DuPage County Highways DuPage County Highways DuPage County Highways DuPage County Highways DuPage County Highways



Overview of Surveyed Sidewalk Condition - Northeast DuPage





ADA Transition Plan Overview of Surveyed Sidewalk Condition - Southwest DuPage Legend Dupage County DOT Sidewalk Conditon 2018



Miles 0 0.5 1 2

DuPage County DOT - ADA Transition Plan

DuPage County Highways

Good Fair

Poor



Overview of Surveyed Sidewalk Condition - Southeast DuPage







DuPage County DOT - ADA Transition Plan

County Highways



Overview of Surveyed Curb Ramp Condition - Southwest DuPage

Legend

Curb Ramp Condition

- More than 2 elements do not comply with PROWAG
 1-2 elements do not comply with PROWAG
 Compliant curb ramp
- Missing curb ramp where warranted
 - County Highways

0 0.5 1 2 Miles



Overview of Surveyed Curb Ramp Condition - Southeast DuPage

Legend

Curb Ramp Condition

- More than 2 elements do not comply with PROWAG
 1-2 elements do not comply with PROWAG
 Compliant curb ramp
- Missing curb ramp where warranted
 - County Highways

0 0.5 1 2 Miles



Overview of Surveyed Pedestrian Push Button Accessibility - Northwest DuPage





Overview of Surveyed Pedestrian Push Button Accessibility - Northeast DuPage





ADA Transition Plan Overview of Surveyed Pedestrian Push Button Accessibility - Southwest DuPage

Legend DuDOT Pedestrian Push Button Obstructions No Obstructions **Obstructions Present Under Construction** 0.5 2 **County Highways** Miles



Overview of Surveyed Pedestrian Push Button Accessibility - Southeast DuPage



DuPage County DOT - ADA Transition Plan

2

Miles













To submit an accessibility concern or complaint to the DuPage County Division of Transportation, please print and complete this form, sign and mail to:				
DuPage County Division of Transportation Attn: ADA Coordinator 421 N County Farm Rd, Room 2-300 Wheaton, Illinois 60187				
or e-mail form as an attachment to ADADOT@dupageco.org				
SECTION I				
Complainant Name (or Third Party):				
Address, City, State, and ZIP:				
Phone #:	Email Address:			
Preferred method of contact?:	Phone	Email	by Mail	
SECTION II				
When did the incident occur? Date(s):				
Please provide information below regarding where the discrimination occurred:				
Roadway or Facility Name:				
Intersection (if applicable):				
City:				
Other Relevant Location Information:				

Please describe in detail the nature of the complaint (include all parties that were involved): **Use additional page(s)** if required and attach any documents you believe support your complaint

Complainant's Signature: _____ Date: _____

ENDNOTES

1 State House, Illinois General Assembly. (2017). 410 ILCS 25 – Environmental Barriers Act. Springfield, IL: Illinois Compiled Statues. http://www.ilga.gov/legislation/ilcs/ilcs3. asp?ActID=1519&ChapterID=35

2 Disability Bureau, Office of the Illinois Attorney General. Defending Your Rights. http://www. ag.state.il.us/rights/disabilityrights.html

3 U.S. Census Bureau Population Division, 2017 Population Estimates for DuPage County, Illinois

4 U.S. Census Bureau Population Division, 2016 County Business Patterns

5 U.S. Census Bureau, 2016 American Community Survey 1-Year Estimates for DuPage County, Illinois

6 U.S. Census Bureau, 2016 American Community Survey 1-Year Estimates for DuPage County, Illinois

7 United States Access Board Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way, July 26, 2011.

8 As a collector of roadway impact fees, DuPage County must regularly publish a comprehensive road improvement program, per Illinois Road Improvement Impact Fee Law

9 2010 ADA Standards for Accessible Design, §36.402. United States Department of Justice, September 15, 2010.

10 This total has increased significantly with recent ADA work in 2017, 2018 and 2019. Plan updates will reflect this and will call out locations improved since the last comprehensive survey.

11 Detectable warning panels were not introduced as a requirement until 2001 and ramps constructed before 2001 without detectable warning panels are not considered non-compliant until alteration threshold is met

12 US Access Board. Accessible Pedestrian Signals and Pedestrian Pushbuttons. Retrieved from https://www.access-board.gov/guidelines-and-standards/streets-sidewalks/public-rights-of-way/ background/regulatory-assessment/accessible-pedestrian-signals-and-pedestrian-pushbuttons

13 Measured in linear feet.