THE CITY OF
ROCKFORD
ILLINOIS, USA

ADA Transition Plan

Public Rights-Of-Way and Sidewalks

Public Works – Engineering Division

January 29, 2018

Contents

Introduction

The City of Rockford's ADA Transition Plan serves as a guide to more definitively serve the City's goal of making all of the transportation facilities within public rights-of-way accessible to all users. Through the Complete Streets Policy and the adopted Comprehensive Plan, the City recognizes the need to develop a multimodal transportation network that balances the need and desire to allow access for all types of travel as well as providing for the health and well-being for people of all ages and abilities. In an effort to continuously improve the City's accessibility goal, this ADA Transition Plan is intended to serve as an operating document to fulfill the requirements of Section 504 of the Rehabilitation Act of 1973 and Title II of the Americans with Disabilities Act of 1990.

Background

The Americans with Disabilities Act (ADA) was enacted on July 26, 1990, to provide comprehensive civil rights protection to persons with disabilities from discrimination by excluding them from services, programs or activities. This legislation mandates that public agencies must provide pedestrian access for persons with disabilities to the streets and sidewalks, whenever a pedestrian facility exists. This requirement is implemented by the installation of elements such as standardized curb cuts, ramps, and detectable warnings.

The ADA, Title II, (1990), required state and local governments receiving federal funds to do a self-evaluation identifying areas which would prevent individuals with disabilities from accessing public areas. This self-evaluation was provided to develop a Transition Plan to remove these problem areas with completion by 1995. This Transition Plan will bring the City of Rockford in compliance with this requirement.

In addition to the Transition Plan, the ADA, Title II, requires that facilities constructed or altered after January 26, 1992, be designed and constructed for available accessibility and usage by people who have disabilities.

Implementation Team

Managing and implementing the ADA Transition Plan requires staff from multiple departments to encompass policy development, technical support, outreach and legal oversight. The responsibilities required within this Plan will be managed by the ADA Coordinator, with support from the following City staff: City Engineer, Legal Director, Permits Manager and the Capital Improvements Program Operations Manager.

General inquiries regarding the City's ADA Transition Plan shall be directed to the acting ADA Coordinator:

> Timothy Hinkens, P.E.
> Capital Improvements Program Operations Manager
> 425 East State Street
> Rockford, IL 61104
> timothy.hinkens@rockfordil.gov
> 779-348-7647

Grievance Procedure

The American with Disabilities Act of 1990 and the Rehabilitation Act of 1973 prohibit a public entity from discriminating against persons with disabilities with access to facilities and services the public entity provides. If users of municipal facilities believe the City has not provided reasonable accommodation in the public right-of-way, the patron has the right to file a complaint.

A complaint may be filed by any person who believes they were subject to discrimination or by a representative on behalf of such person. The complaint shall be in writing and contain information about the alleged discrimination such as name, address, and phone number of complainant as well as location, date, and description of the problem. Alternative means of filing complaints will be made available for persons with disabilities upon request.

The complaint should be submitted by the grievant and/or his/her designee as soon as possible but no later than 60 calendar days after the alleged violation to:

> City of Rockford Department of Public Works
> ATTN: ADA Coordinator
> City of Rockford
> 425 East State Street
> Rockford, IL 61104

The City will acknowledge receipt of complaint and begin its investigation. If the complaint filed does not concern a City facility, it will be forwarded to the appropriate agency. If appropriate, the City representatives will meet with the complainant in attempt to reach a resolution. The resolution by the City will not constitute a precedent upon which following complaining parties may rely.

To request a repair or replacement of sidewalk, citizens are encouraged to report a Service Request through the City of Rockford website at www.rockfordil.gov or to call (779) 348-7176.

Design Standards and Guidelines

As the federal guidance and other standards are updated, the City adopts these latest regulations as the minimum standards for use on the public right-of-way.

- City of Rockford Engineering Design Criteria Manual

- Illinois Department of Transportation (IDOT) – Bureau of Design and Environmental Manual

- IDOT Policies – Bureau of Local Roads, Requirements for Accessible Public Rights of Way

- IDOT Highway Standards

- Federal Highway Administration (FHWA) – Polices & Highway Standards

- American with Disabilities Act (ADA) Standards for Accessible Design (2010)

- Public Right-of-Way Accessibility Guidelines (PROWAG)

- State of Illinois Capital Development Board (1997 April 24), Illinois Accessibility Code

- United States Access Board – Policies & Highway Standards

The City has adopted a Subdivision Ordinance requiring sidewalk and multi-use path construction as part of new development. In addition, the City adopted a Complete Streets Policy addressing the need for pedestrian improvements.

Self-Evaluation

As part of the ADA Title II compliance requirements, the City of Rockford examined its policies and practices to determine possible barriers for participation by people with disabilities. As part of this Transition Plan, the City provides the identification of existing and planned accessible paths of travel for public facilities and the programs to facilitate prioritization. Curb ramps, sidewalks, pedestrian signals, driveway crossings and other pedestrian facilities are to be reviewed for compliance with recent design standards.

In general, the City of Rockford, in a good faith effort, has previously provided some type of curb ramp accessibility to the City's potential curb ramp locations. However, the majority of these do not meet ADA or Public Rights-of-Way Accessibility Guidelines (PROWAG) as approved by the State of Illinois requirements to the greatest extent feasible. The majority of these curb ramps that are in non-compliance fail to meet one or more of the following ADA or PROWAG criteria:

- Lack of a truncated dome detectable surface with contrasting color

- Cross slopes exceeding 2 percent (2%)

- Curb ramps not being flush with the existing road surface

- Longitudinal slopes exceeding 1-inch vertical to 12-inch horizontal

The City of Rockford has a three-tiered system to identify and assess barriers in the public right-of-way:

1. A preliminary evaluation of intersections including curb ramps and adjacent sidewalks. Many of these evaluations are completed throughout the summer and fall. The current inspection form for intersection evaluation is located in Appendix A. The inspection results are entered into the City's Geographic Information System (GIS).

2. A detailed evaluation of intersections, sidewalks and crosswalks as part of the City's Capital Improvement Program. These evaluations occur yearly as streets are selected for that year's capital improvement planning. Non-conforming accessibility issues through the detailed evaluation will be addressed as part of the capital improvement project.

3. Within the City's Geographic Information System (GIS) is a layer identifying existing multi-use paths throughout its jurisdiction. The map includes paths owned by Winnebago County and the Rockford Park District. The map is used to identify gaps within the path system in order to prioritize construction of new paths.

Addressing Barriers

The City of Rockford has taken many different approaches in removing barriers in the public right-of-way, including proactively identifying and eliminating the barrier, responding to public grievances, as well as ensuring the appropriate design and build-out of new construction.

Reasonable Accommodation Request

The City of Rockford will attempt to provide relief to the public right-of-way where a person with a disability has requested help as highest priority. Other requests will be prioritized based on the following criteria below:

Prioritization

A. Presence of a population with disabilities or specific request from a person with a disability or advocacy group.
B. High volume of pedestrians such as in the downtown or business district.
C. Near public buildings, hospitals, business areas, schools or universities.
D. Low volume of pedestrian use, such as residential subdivisions.
E. Where there are no sidewalks or paths.
F. Pedestrian push buttons in incorrect location.

Secondary Prioritization

1. Existing unsafe ramp due to deterioration and presents an immediate hazard to the travelling public, including excessive slopes or abrupt changes in the surface elevations.
2. There is no ramp at a pedestrian crossing in an area with sidewalks.
3. Where ramps are generally safe and in good condition but do not fully comply because there are no detectable warnings with domes, side tapers are not in compliance, etc.
4. Where it is not feasible to construct a ramp because of excessive slopes or obstacles.
5. Existing ramps are compliant with the existing standards.

Each ramp location can be rated according to both of these criteria. Specific projects designed to build ramps or correct deficiencies should address those rated A, B, and C, as well as 1 and 2, first. Those rated E or 4 would not qualify for ramp installation until such time as sidewalks are installed or there is an extensive project in the areas that would address the change of slope or obstruction and allow a ramp to be installed. Other locations rated D or 3 should be either included in projects making an alteration or as funding permits. See the following exhibit for further clarification (this exhibit is for reference only and may be modified to comply with the current standards).

Criteria for Determining Impediments at City Facilities

To determine if corrective action needs to be taken at a City operated facility, the following evaluation criteria has been established.

1. Is the facility currently ADA compliant, and has the facility undergone previous renovations to obtain past ADA compliance?
2. What is the current state of accessibility?
3. What are the costs of alternative corrective actions?
4. Is the physical barrier programmed for removal as part of ongoing maintenance?
5. Can the program or service be provided at an alternative facility?

The City will complete an inventory and review of its facilities to determine ADA compliance. When completed the results of this survey will be provided in Appendix B of this Transition Plan.

Construction Costs & Schedule

Estimated Construction Cost

Since the City is still collecting inventory and evaluating its sidewalk ramps, an estimated construction cost has not been completed. Once the evaluation is complete, this section will be updated.

Costs will be based upon an average of the bid tabulations from recent sidewalk ramp repairs.

Schedule

The City of Rockford will make reasonable efforts to improve the accessibility of pedestrian facilities in the public right-of-way through its annual roadway Capital Improvement Plan. This includes the Neighborhood Program, Capital Roadway Improvements Program and Active Transportation Program. Compliance is required to the maximum extent practicable within the scope of the project.

There will be instances when it is technically infeasible to provide compliance due to the physical and topographical limitations of the area. These limitations will be documented in the project file. The City may choose not to install a sidewalk or path at some locations or may choose to lower the priority if a reasonable path of travel is available even without a sidewalk.

City Funding Sources

All new projects, regardless of funding sources, shall include pedestrian elements consistent with the ADA guidelines. Since the enactment of the ADA in 1990, the City has put forth a good faith effort in trying to provide sidewalk accessibility through the following programs:

- Neighborhood Program – provides funds for construction projects on the City's residential streets and alleys. Each Ward is allocated monies for resurfacing or reconstruction of these streets and alleys. Sidewalks and ramps are evaluated and replaced as part of the construction projects.

- Capital Roadway Improvements – provides funds for improvements on the City's network of arterial, collector, commercial and industrial streets. A component of the Complete Streets Policy requires City staff to evaluate these streets for various pedestrian

components. At a minimum, ADA compliance is met as part of the project, but projects may include construction of new sidewalk or multi-use paths.

- Sidewalk and Active Transportation Program – provides funds for improving pedestrian accommodations throughout the City. The goal of this program is to improve the safety and mobility of pedestrians throughout the City by repairing or replacing damaged and deteriorated sidewalks, installing new intersection curb ramps at pedestrian crossings in accordance with ADA standards, construction of sidewalk in areas where gaps exist and improving the City's multi-use path and trail system.

- Private Development - Developers of new construction projects are required to provide new sidewalk or multi-use path in areas of the project where none exist and upgrade curb ramps as needed within the right-of-way along their property. In some instances where the feasibility of sidewalk or path installation is limited, the developer may be required to pay cash in lieu of the sidewalk that the City, then, uses to complete gaps in the sidewalk and multi-use path system.

Other potential sources of funding for sidewalk and multi-use path improvements as well as ADA compliance include:

- Highway Safety Improvement Program

- Railway – Highway Crossing Program

- Recreational Trail Program

- Safe Routes to School Program

- Surface Transportation Program (Federal Highway Administration)

- Transportation Enhancement Activities Program

Monitor Progress

Each year the City will document the following information:

- Number of existing sidewalk or multi-use path ramps replaced

- Number of new sidewalk ramps constructed

- Lineal feet or mileage of existing sidewalk repaired or replaced

- Lineal feet or mileage of new sidewalk constructed

- Lineal feet or mileage of new multi-use path constructed

The City will review and update the ADA Transition Plan as needed to reflect changes in real world conditions and to address any possible new areas of non-compliance.

The City of Rockford intends to implement this Transition Plan effective immediately from the date of this document's approval. The City is committed to acting on the guidelines set forth in this document.

APPENDIX A

RAMP INVENTORY DIAGRAM

THE CITY OF ROCKFORD ILLINOIS USA

INTERSECTION:_____ AND _____

DATE: _____ BY _____

RAMP PRIORITY RATING SYSTEM

A. Presence of a disabled population or specific request from a disabled person or advocacy group

B. High Volume of Pedestrians such as in the downtown or business district.

C. Near public buildings, business areas such as shopping malls, hospitals, or schools/universities.

D. Low volume pedestrian use, areas such as residential subdivisions.

E. Where there are no sidewalks.

1. Existing ramp which is unsafe due to a deterioration, excessive slopes, or abrupt changes in the surface elevations.

2. There is no ramp at a pedestrian crossing in an area with sidewalks.

3. Where ramps are generally safe and in good condition but do not fully comply because there are no detectable warnings with domes, side tapers are out of compliance, etc.

4. Where it is not feasible to construct a ramp because of excessive slopes or obstacles.

5. Existing ramps are compliant with the existing standards.

TRANSITION PLAN PRIORITY SYSTEM

A1	B1	C1	D1	E1
A2	B2	C2	D2	E2
A3	B3	C3	D3	E3
A4	B4	C4	D4	E4
A5	B5	C5	D5	E5

*Quadrants rated A1, A2, B1, B2, C1, or C2 are highest priority and color coded "red."

* Quadrants rated A3, B3, C3, D1, D2 or D3 are medium priority and included in adjacent projects or as budget allows and would be color coded "blue."

* Quadrants rated E or 4 are low priority and not eligible until such time sidewalks were installed or the ramp became feasible and would be color coded "brown."

* Quadrants rated 5 do not need replaced and are color coded "green."

	Yes	No
Truncated Domes?	☐	☐
Contrasting Colors?	☐	☐
Landing 4' x 4'?	☐	☐
Longitudinal Slope between 5-8%?	☐	☐
Cross Slope ≤ 2%?	☐	☐

	Yes	No
Truncated Domes?	☐	☐
Contrasting Colors?	☐	☐
Landing 4' x 4'?	☐	☐
Longitudinal Slope between 5-8%?	☐	☐
Cross Slope ≤ 2%?	☐	☐

	Yes	No
Truncated Domes?	☐	☐
Contrasting Colors?	☐	☐
Landing 4' x 4'?	☐	☐
Longitudinal Slope between 5-8%?	☐	☐
Cross Slope ≤ 2%?	☐	☐

	Yes	No
Truncated Domes?	☐	☐
Contrasting Colors?	☐	☐
Landing 4' x 4'?	☐	☐
Longitudinal Slope between 5-8%?	☐	☐
Cross Slope ≤ 2%?	☐	☐