



Americans with Disabilities Act (ADA) Self-Evaluation and Transition Plan for the Public Right-of-Way

City of Albany, Oregon, Public Works Department

October 2022



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Acknowledgments

Many individuals were involved with the development of the City of Albany ADA Self-Evaluation and Transition Plan for the Public Right-of-Way. Implementation of this Plan will include efforts of City Leadership and across City Departments.

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1. Introduction

This ADA Self-Evaluation and Transition Plan (Plan) for the Public Right-of-Way will support the City of Albany to fulfill the requirements set forth in Title II of the Americans with Disabilities Act (ADA). The ADA states that a public entity must reasonably modify its policies, practices, or procedures to avoid discrimination against people with disabilities. This Plan will assist the City in identifying policy, program, and physical barriers to accessibility, and will guide the City in developing barrier removal solutions.

The evaluation of Public Works policies, programs, and services is described in Section 2 – Self-Evaluation of this document. Section 2 details the review of Public Works policies, services, programs, and activities and is based on responses to a program accessibility questionnaire, which was completed by City staff, and a review of City and Public Works documents and policies.

A description of the evaluation of physical barriers in the public right-of-way and the strategy for the removal of barriers is included in Section 3 – ADA Transition Plan for the Public Right-of-Way.

An overview of the topics the City should consider and address when implementing barrier removal efforts is provided in Section 4 – Barrier Removal Considerations for Plan Implementation.

Section 5 – Responsible Employee, Notice Policy, and Grievance Procedure includes the City’s notice under the ADA and the City’s ADA Grievance Procedure.

Commonly used terms within this document and in the ADA are included in Section 6 – Definitions, and Section 7 – Program Accessibility Guidelines, Standards, and Resources contains guidelines, and resources for addressing the recommendations included in this Plan.

The City of Albany has designated a Disability Access Coordinator. The Disability Access Coordinator is responsible for tracking the efforts of the City to comply with Title II and for the coordination and investigation of accessibility-related complaints. The Disability Access Coordinator is also considered a resource for City Departments to achieve ADA compliance and assist with policy and program development to ensure program accessibility (28 CFR 35.130; 28 CFR 35.149).

1.1 Legislative Mandate

The ADA is a comprehensive civil rights law for persons with disabilities in both employment and the provision of goods and services. The ADA states that its purpose is to provide a “clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities.” Congress emphasized that the ADA seeks to dispel stereotypes and assumptions about disabilities and to assure equality of opportunity, full participation, independent living, and economic self-sufficiency for people with disabilities. Congress passed the ADA on July 26, 1990. Title II of the ADA covers programs, activities, and services of public entities. Under the requirements of the ADA:

No qualified individual with a disability shall, on the basis of disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity (28 CFR 35.130).

Further, Title II of the ADA provides that public entities must identify and evaluate all programs, activities, and services and review all policies, practices, and procedures that govern administration of the entity's programs, activities, and services (28 CFR 35.105). This Plan, and certain documents incorporated by reference establish the City of Albany’s ADA Self-Evaluation and Transition Plan.

Application of Regulations

As a public entity, the City of Albany is subject to the ADA’s Title II Requirements for State and Local Government Programs and Services and is responsible for the provision of accessible programs and facilities that are available without discrimination toward people with disabilities. A fundamental tenet of Title II of the ADA is *“the principle that individuals with disabilities must be provided an equally effective opportunity to participate in or benefit from a public entity's aids, benefits, and services.”* (www.ada.gov/taman2.html#II-3.3000) This principle is referred to as program accessibility.

A public entity may not deny the benefits of its programs, activities, and services to individuals with disabilities because its facilities are inaccessible. A public entity's services, programs, or activities, when viewed in their entirety, must be readily accessible to and usable by individuals with disabilities. This standard, known as “program accessibility,” applies to all existing facilities of a public entity. Public entities, however, are not necessarily required to make each of their existing facilities accessible (www.ada.gov/taman2.html#II-5.1000).

As a public entity, the City is required to ensure program accessibility for the programs it provides to the public.

Maintaining Accessible Facilities

In addition to providing programmatic access, the City is obligated to maintain all accessible facilities in working order. Exceptions are provided for temporary disruptions. The ADA contains the following language regarding the maintenance of accessible features:

Maintenance of Accessible Features. Public entities must maintain in working order equipment and features of facilities that are required to provide ready access to individuals with disabilities. Isolated or temporary interruptions in access due to maintenance and repair of accessible features are not prohibited.

Where a public entity must provide an accessible route, the route must remain accessible and not blocked by obstacles such as furniture, filing cabinets, or potted plants. An isolated instance of placement of an object on an accessible route, however, would not be a violation, if the object is promptly removed. Similarly, accessible doors must be unlocked when the public entity is open for business.

Mechanical failures in equipment such as elevators or automatic doors will occur from time to time. The obligation to ensure that facilities are readily accessible to and usable by individuals with disabilities would be violated, if repairs are not made promptly or if improper or inadequate maintenance causes repeated and persistent failures (www.ada.gov/taman2.html#II-3.1000).

1.2 Discrimination and Accessibility

This section provides an overview of physical and programmatic accessibility and the basic methods of providing access. Absence of discrimination requires that both types of accessibility be provided.

- Physical accessibility requires that a facility be barrier-free. Barriers include any obstacles that prevent or restrict the entrance to or use of a facility.
- Programs offered by the City to the public must be accessible. Program accessibility requires that individuals with disabilities are provided an equally effective opportunity to participate in or benefit from a public entity's programs and services. Accessibility includes advertisement, orientation, eligibility, participation, testing or evaluation, physical access, provision of auxiliary aids and services, transportation, policies, and communication.

The City may achieve program accessibility by several methods:

- Structural methods such as altering an existing facility;
- Acquisition or redesign of equipment;
- Assignment of aids; or
- Providing services at alternate accessible sites.

When choosing a method of providing program access, the City is required to prioritize the method that results in the most integrated setting appropriate to encourage interaction among all users, including individuals with disabilities. In compliance with the requirements of the ADA, the City must provide equality of opportunity.

1.3 ADA Self-Evaluation and Transition Plan Requirements and Process

The ADA Self-Evaluation and Transition Plan is intended to provide a framework for the continuous improvement of City programs and facilities for people with disabilities. The Plan is intended to be a living document that is regularly updated as programs and services change, as barriers are removed. This document focuses solely on the public right-of-way and the programs and activities provided by the Public Works Department. The city is actively in the process of updating the self-evaluation and transition plan for citywide activities which includes Parks & Recreation and Library services and facilities.

The ADA Self-Evaluation identifies and makes recommendations to correct policies and practices in programs and services provided by Public Works that are inconsistent with Title II regulations and result in limited access for people with disabilities. As part of the Self-Evaluation, the City:

- Evaluates services, policies, and practices;
- Identifies modifications needed to services, policies, and practices; and
- Involves people with disabilities in the self-evaluation process (28 CFR 35.105).

Programs, activities, and services offered by the City to the public must be accessible for people with and without disabilities. Accessibility applies to all aspects of programs or services provided by the City, including:

- Notice;
- Responsible Employee and Grievance Procedure;
- Customer Service;
- Staff Training;
- Contracting, Licensing, or Other Arrangements;
- Public Meetings;
- Program Participation;
- Transportation Services;
- Tours and Trips;
- Accessible and Adaptive Equipment;
- Printed and Online Materials;
- Website;
- Televised and Audiovisual Information;
- Telecommunications;
- Emergency Planning;
- Facilities; and
- Accessibility Practices in the Right-of-Way

The Transition Plan outlines a strategy for the City and specifically Public Works to progress toward compliance with the ADA. The Transition Plan identifies physical barriers for persons with disabilities and a schedule to remove those barriers over time and must:

- List barriers;
- Identify feasible solutions to each barrier;
- Establish a timeline for removing barriers;
- Identify the person responsible for Title II compliance; and
- Involve people with disabilities in the preparation of the Plan (28 CFR 35.150.d).

Self-Evaluation

The City of Albany's Public Works Department evaluated its policies, programs, and procedures to determine current levels of service and the extent to which its policies and programs created barriers to accessibility for persons with disabilities. Recommended actions for Public Works programs, activities, and services are incorporated as part of this Plan.

Transition Plan

The Public Works Department completed a physical audit of facilities in the right-of-way to identify potential facility barriers and identify recommendations and alterations to meet state and federal accessibility standards. The type of facilities evaluated include:

- Curb ramps;
- Pedestrian access routes;
- Transit stops;
- On-street parking facilities; and
- Pedestrian push buttons and crossing times.

At the time of the facility evaluations, the following resources were used to identify barriers in the public right-of-way: the 2010 ADA Standards for Accessible Design, 2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG), 2019 Oregon Structural Specialty Code (OSSC), Chapter 11, and the 2009 Edition, Manual on Uniform Traffic Control Devices, Including Revision 1, and Revision 2 dated May 2012. Codes and standards are revised every few years. The barrier evaluations conducted provide an assessment of current conditions as viewed by current code and provide a baseline for future barrier removal.

1.4 Public Outreach

Public entities are required to accept comments from interested persons on their ADA Self-Evaluation and Transition Plan, including individuals with disabilities and organizations that represent them to assist in the self-evaluation process. A page is designated on the City's website to serve as an information portal for the ADA Self-Evaluation and Transition Plan process. During development of this Plan, people with disabilities, and those that provide assistance or services to others with disabilities and other interested Albany residents participated in a stakeholder group. ADA stakeholder group meetings were held in June and November of 2021, and *[placeholder for 2022]* to introduce the project and receive questions and comments and provide input on the prioritization of barriers and the draft Plan. Participants shared their opinions and experiences related to City facilities, programs, and services as they relate to the ADA. Meeting agendas and notes are available on the City's website on the ADA Self-Evaluation and Transition Plan project webpage. *[Placeholder section for online public review of plan.]*

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2. Self-Evaluation

Under Title II of the Americans with Disabilities Act (ADA), all programs, activities, and services offered to the public by the City of Albany must be accessible for people with and without disabilities. Accessibility applies to all aspects of a program or service. Under Title II, public entities are required to evaluate their programs, activities, and services, make modifications to potentially discriminatory practices, and provide the opportunity for individuals with disabilities or organizations representing people with disabilities to participate in the process. When a public entity has 50 or more employees, it is required to maintain a record of the examination, describe the issues identified, describe the modifications made, and list the interested individuals consulted as part of the process (28 CFR 35.105).

The self-evaluation process identifies barriers and makes recommendations to correct policies and practices inconsistent with Title II regulations and result in limitations to access for people with disabilities. As programs and facilities use change, a review of accessibility should be conducted. If a public entity is the recipient of Federal Department of Transportation funds, a system for tracking program and service deficiencies and periodically reviewing and updating the self-evaluation is required (49 CFR 27.11(c)(2)(i-v)).

The City of Albany Public Works evaluation included three elements: a staff questionnaire, a review of Public Works policies, and a review of the City's standards and specifications. This report incorporates the staff questionnaire results, the policy review observations, and the evaluation of standards and specifications and makes recommendations to improve accessibility in the Department's programs, activities, and services.

The Disability Access Coordinator designee will follow up with department managers to review the recommendations. In those situations where a policy, program, or procedure creates a barrier to accessibility that is unique to a department or a specific program, the Disability Access Coordinator or designee will coordinate with the department head or program manager to address the removal of the barrier in the most reasonable and accommodating manner in accordance with applicable law.

2.1 Staff Questionnaire and Policy Review Summary

A program accessibility questionnaire was administered to Public Works staff responsible for facilities in the public right-of-way in early 2021. The questionnaire highlighted areas where the Public Works department effectively meets the needs of people with disabilities while also identifying potential gaps in department practices. A complimentary evaluation of Public Work's services, policies, and practices was also undertaken during the same period. The review includes policies and administrative rules, public documents, forms, applications, and the City's municipal code. The results of the analysis serve as the basis for implementing improved access to the Public Works programs as required by the ADA.

ADA Self-Evaluation and Transition Plan for the Public Right-of-Way

This section is organized into the following categories based on the requirements of Title II of the ADA:

- Notice;
- Responsible Employee and Grievance Procedure;
- Customer Service;
- Staff Training;
- Contracting, Licensing, or Other Arrangements;
- Public Meetings;
- Program Participation;
- Transportation Services;
- Tours and Trips;
- Accessible and Adaptive Equipment;
- Printed and Online Materials;
- Website;
- Televised and Audiovisual Information;
- Telecommunications;
- Emergency Planning; and
- Facilities.

The policy summaries are derived from a review of the Public Works policies and programs. The required and recommended actions that follow are derived from assessing the questionnaire responses, the policy review process, or both.

Required actions are based on legislative requirements or other best practice guidelines for accessibility. Some actions are always required, such as posting a notice of nondiscrimination, while other actions are only required when requested, such as providing alternative formats (for example, large print, braille). In many cases, Public Works has multiple options for providing accessible programs, activities, and services. This section also includes implementation strategies and links to the Department of Justice’s online best practices tool kit. The Tool Kit should be considered a helpful supplement to – not a replacement for – the regulations and technical assistance materials that provide more extensive discussions of ADA requirements. For the full “Best Practices Tool Kit for State and Local Governments,” refer to <https://www.ada.gov/pcatoolkit/toolkitmain.htm>.

The reviewed services, policies, and practices are incorporated into an ADA Self-Evaluation Workbook in an MS Excel format, which documents existing conditions and suggests barrier removal actions for providing access to Public Works programs. The Self-Evaluation Workbook is intended to be the working document for implementing improvements and should be maintained by the City's Disability Access Coordinator or designee. The Public Works Department will review the plan annually in conjunction with the annual review of the city's Capital Improvement Program. Changes or updates to progress will be made at this time.

2.2 Notice

Title II regulations require the City to inform the public of the rights and protections provided by the ADA for access to public programs, services, and activities (28 CFR 35.106). It is the obligation of the head of the public entity to determine the most effective way of providing notice to the public about their rights and the public entity's responsibilities under the ADA. Publishing and publicizing the ADA notice is not a one-time requirement. Public agencies should provide the information on an ongoing basis and update the information whenever necessary.

Policy Review Summary

The City's ADA Notice is provided on the City's website within the text of the page <https://www.cityofalbany.net/accessibility/ada-notice>.

Required Actions

- Continue to provide public notice of the City's commitment to providing accessible services (28 CFR 35.106).
- Ensure that people claiming a violation of Title II are not retaliated against or discriminated against for making such a claim (28 CFR 35.134).

Implementation Strategies

- Ensure staff is aware of the public locations of the nondiscrimination statement and the procedure for filing a disability discrimination or grievance complaint.
- Provide notice of the availability of program modifications, alternative formats of materials, and auxiliary aids. Include contact information for staff who can provide assistance. Establish a standardized advanced notice requirement and publicize.
- Include a nondiscrimination notice in department publications, similar to the following with up-to-date Disability Access Coordinator contact information:
The City of Albany does not discriminate on the basis of disability in the admissions or access to its programs or activities. A Disability Access Coordinator has been designated to coordinate compliance with the nondiscrimination requirements contained in the Department of Justice regulations implementing Subtitle A of Title II of the Americans with Disabilities Act (42 U.S.C. 12131-12134), which prohibits discrimination on the basis on disability by public agencies.
- Republish and rebroadcast radio, newspaper, television, or mailings of the notice periodically, as applicable.
- Increase outreach to people with disabilities and the organizations that serve them to provide information about possible modifications and the accessibility of services, programs, and activities.

2.3 Responsible Employee and Grievance Procedure

Title II of the ADA requires a state or local government agency that employs 50 or more people to develop and publish an ADA grievance procedure and to designate at least one employee as the Disability Access Coordinator. In Albany, the Disability Access Coordinator is responsible for the coordination of the City's efforts to implement the self-evaluation and transition plan. The Disability Access Coordinator is responsible for investigating any complaints that the City has engaged in an action prohibited by Title II and is often responsible for communicating the City's efforts to comply with and fulfill its responsibilities under Title II of the ADA.

Policy Review Summary

The City has designated a Disability Access Coordinator whose name, office address, and telephone number are provided on the City's website (<https://www.cityofalbany.net/accessibility>) and the City has published an ADA grievance procedure to ensure prompt resolution of complaints.

Required Actions

- Continue to provide the name, office address, and telephone number of the employee or employees responsible for ensuring the City meets its ADA obligations under Title II to staff and the public (28 CFR 35.107).
- Continue to publish the grievance procedure to provide fair and prompt resolution of accessibility-related complaints (28 CFR 35.107).
- Department of Transportation fund recipients and subrecipients must keep complaints on file for one year and maintain a record, which may be in summary form, for five years (49 CFR 27.121 (b)).

Implementation Strategies

- Refine the role and responsibilities of the Disability Access Coordinator and determine whether additional employees need to be identified to support this position.
- Provide training for this position and employees supporting this position with regard to knowledge of the ADA and other laws addressing the rights of people with disabilities.
- Provide training on the various alternative formats and technologies that enable people with disabilities to communicate, participate, and perform tasks.
- Ensure that the employee in this position has or receives adequate training to negotiate and mediate topics involving the grievance process.
- Ensure that grievances are documented effectively and addressed in a timely manner.
- Maintain the citywide webpage to address and inform the public on the city's obligation under title II of the ADA. The citywide page serves to provide a one-stop portal for access to the ADA notice, Disability Access Coordinator, requests for auxiliary aids and services, program modifications, the complaint process, self-evaluation and transition plan documents, and other city efforts regarding accessibility.
- Continue to provide an ADA barrier removal request form on the Contact the City of Albany, Oregon web page. This barrier removal request form can provide an opportunity for a person with a disability to report a need or concern related to programs, activities, or services provided by the City without filing a formal complaint.
- When requested, provide information identifying locations for pending or in-progress grievances that have already been reported.

2.4 Customer Service

In-person interaction with the public is one of the primary functions of most City departments. To meet ADA standards for in-person interactions, staff should be aware of the formal and informal procedures for accommodating people with disabilities, including appropriate responses to requests for program modifications and guidelines for accommodating service animals. Only dogs are recognized as service animals under Title II of the ADA. In limited cases, miniature horses that are individually trained to perform tasks for people with disabilities may also qualify to provide services. Emotional support, therapy, comfort, or companion animals are not considered service animals under the ADA.

Policy Review Summary

The City's municipal code uses terms such as "handicapped persons," "the disabled," and similarly outdated language. A customer service approach to verbal and written communication uses appropriate and respectful vocabulary, emphasizing the person first, rather than the disability (for example, people with disabilities instead of the disabled). Definitions and terminology used by the City should conform with the ADA wherever possible (for example, use service animal instead of seeing-eye dog). Additionally, the definition of "pedestrian" in the City's code should be amended to include persons using mobility devices. The City's policy on "at large" dogs, prohibiting off-leash dogs, could discriminate against people with disabilities who rely on service animals that are required to be off-leash.

Required Actions

- Continue to make appropriate modifications to regular practices to accommodate individuals with disabilities needs when providing customer service (28 CFR 35.130).
- Continue to ensure an additional fee is not charged to people requesting a program modification due to their disability (28 CFR 35.130(f)).
- Continue to ensure that service animals are allowed in City facilities (28 CFR 35.136).
- Make reasonable modifications for people with disabilities who rely on a miniature horse that is individually trained to assist them (28 CFR 35.130(i)).

Implementation Strategies

- Ensure that staff members are aware of the City's policy regarding service animals and are trained to implement this policy appropriately.
- Develop a process for determining reasonable modifications as people with disabilities request them. The process should address the following considerations:
- Ensure the public has easy access to information about requesting modifications and understanding who to contact.
- Ensure all staff can direct a person requesting the modification to the appropriate staff member.
- Ensure requests can be accepted from someone on behalf of the person with a disability and are not required to be in writing.
- Ensure that requests and outcomes are tracked.

2.5 Staff Training

As a part of the City's ongoing staff development and training, the incorporation of disabilities awareness, standards, and resources is encouraged for all staff interfacing with the public or who maintain the facilities used by the public.

Policy Review Summary

The evaluation of Public Works training policies did not identify any additional barrier removal actions for this category.

Required Actions

- Ensure that city staff is knowledgeable about obligations, policies, and procedures for providing accessible services, programs, and activities to the public (28 CFR 35.130; 28 CFR 35.160).
- Ensure that city staff is knowledgeable about procedures for responding to requests for modifications (28 CFR 35.160).
- Ensure that city staff is knowledgeable about construction and maintenance of accessible facilities (28 CFR 35.133).

Implementation Strategies

- Develop and disseminate best practice resources for staff to formalize the City's approach to addressing accessibility concerns.
- Provide training to design, inspection, and maintenance staff regarding accessibility standards and maintaining facilities in an accessible condition.
- Provide all department staff with ongoing awareness and sensitivity training.
- Develop a comprehensive disability access training program. Educate staff about their responsibilities under the ADA. The City's Disability Access Coordinator or City supervisors should be responsible for ensuring that staff members receive training. Staff members who have contact with the public should receive additional training about the process of providing modifications and assistive devices to make their programs, activities, and services accessible. Ensure that training also includes information about responding to a variety of disabilities and the availability of program-specific adaptations, assistive devices, and modifications.
- Develop standard guidelines for training materials. These guidelines should include standard language that appropriately describes the city's policy on inclusion and nondiscrimination. Staff members should receive training in using the guidelines effectively.
- Offer training to staff members that have contact with the public and wish to learn basic ASL communication skills. Training should emphasize basic communication and should not be viewed as a substitute for utilizing qualified ASL interpreters when requested.

2.6 Contracting, Licensing, or Other Arrangements

All events on public property should be accessible to people with disabilities. Many public agencies rely on contractors, licensees, consultants, and other entities to deliver City services. These entities are considered an extension of the City's services and must adhere to the same ADA regulations.

Policy Review Summary

Temporary right-of-way use permitting process described in the City's code does not address accessibility obligations for groups hosting events on public property. However, the Public Works website contains a Sales/Seating Encroachment Application for temporary encroachment into the public right-of-way that effectively communicates the responsibility to maintain an accessible route through the right-of-way.

Required Actions

- Ensure that contractors, licensees, consultants, and other entities providing or delivering services for the city adhere to the same ADA regulations as the City (28 CFR 35.130).
- Ensure the city selects procurement contractors using criteria that does not discriminate on the basis of disability (28 CFR 35.130).
- Maintain City facilities in an accessible order to help ensure the accessibility of events held by public and private organizations (28 CFR 35.133).

Implementation Strategies

- Ensure contractors, licensees, and other entities providing services to the public are aware of their obligation to make City programs and activities accessible. Provide checklists, resources, contractual language, or other means to help them understand and meet their obligations.
- Ensure the information provided includes the minimum clearances for accessible routes during activities within the right-of-way.
- Monitor public programs and activities provided by contractors, licensees, and other entities to ensure continued accessibility. Provide staff with resources for conducting this review.
- Inform organizations that coordinate or sponsor events at City facilities about applicable ADA requirements.

2.7 Public Meetings

Public meetings are a regularly occurring activity for public agencies. Any public meeting's main objective is to impart and solicit information on issues of importance to the local government. Where these meetings are held is one of the essential considerations for meetings under the ADA requirements.

Policy Review Summary

During the self-evaluation review process, regular public meetings for the Public Works department were held in a digital format. A review of the digital records for meetings prior to the pandemic indicate that meeting agendas provide information that the facility of the meeting location is in an accessible location and requests for accommodation can be made with advance notification,

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without specifying the minimum timeline for making the request. A review of the public comment policy at City Council meetings limits the speaking time to three minutes and does not address exceptions for people with disabilities that impact speech. Protocol for public meeting engagement should allow for modifications to the standard procedures to ensure that people with disabilities are able to participate at the same level as others.

Required Actions

- Continue to ensure that public meetings are held in accessible facilities (28 CFR 35.160).
- Provide agendas and other meeting materials in alternative formats upon request (28 CFR 35.160).
- Provide flexibility in the time limit on speaking for individuals with communication difficulties (28 CFR 35.160).
- Ensure that assistive listening devices are available for public meetings where the sound at the meeting is amplified (28 CFR 35.160; 2010 Standards 219.2 Required Systems).
- Provide the opportunity to participate in public meetings remotely using technology such as a telephone, video, or other digital means and when oral and written testimony is allowed, provide a similar means of participation remotely (OR HB 2560-A).

Implementation Strategies

- When possible, share meeting content before the meeting and allow the submission of questions in advance of the meeting.
- Ensure a consistent advanced notice requirement and communicate this to both staff and the general public.
- Ensure the City allows for longer than three minutes of speaking time at City Council meetings when requested for a disability.
- Display a notice on meeting agendas and web pages providing agendas and other meeting materials, indicating the availability of alternative formats of meeting materials and other elements of meeting participation.
- Prepare a list of accessible meeting spaces to facilitate the scheduling of meetings or the relocation of meetings as needed upon request.
- Maintain a list of on-call ASL interpreters who can attend meetings upon request to assist individuals who are deaf or have hearing loss.
- Develop a checklist and provide instruction to staff on ensuring the accessibility of meetings. Guidelines should include examples of the types of modification requests that may be made by people with different types of disabilities, including assistive listening systems, sign language interpreters, readers, descriptive services, and other assistive technologies like real-time captioning. Other considerations include the layout of the room and the locations of the sign-in and refreshments tables, bathrooms, and other elements to ensure these features are accessible.
- Assign a member of staff as a greeter at public meetings and events. Identify this person as a resource for people who may require assistance.

2.8 Program Participation

The public must be able to access all programs, services, and activities, regardless of disability, unless a modification would result in a fundamental alteration to the nature of a service, program, or activity, or impose undue financial and administrative burdens (28 CFR 35.164). Admission criteria, ability to complete forms, and participation in interviews must be available to all public members by providing reasonable modifications.

Policy Review Summary

The Public Works evaluation did not identify barriers for this topic, but required actions are presented to highlight the need to watch for potential future barriers for this category.

Required Actions

- Provide reasonable modifications to program participants with disabilities to include them in regular programs to the maximum extent possible. Do not require the use of different or separate aids, benefits, or services, even if they are as effective as those provided to other individuals (28 CFR 35.130).
- Modify standard policies, practices, or procedures to avoid discrimination unless the modification would fundamentally alter the nature of the program, result in an undue financial or administrative burden, or create a hazardous situation for the participant or others (28 CFR 35.130).
- Ensure that if the City determines it is necessary to exclude or limit the participation of people with disabilities to ensure the safe operation of programs or services, it bases those determinations on real risks, not on speculation, stereotypes, or generalizations (28 CFR 35.130).
- Ensure that when interviews are required for program participation, they are held in an accessible location and that alternative formats or auxiliary aids are provided upon request (28 CFR 35.164; 28 CFR 35.160).
- Ensure that surcharges are not placed on people with disabilities to cover the costs of aids, modifications, or program accessibility (28 CFR 35.130).

Implementation Strategies

- Increase outreach to people with disabilities and the organizations that serve them to ensure program accessibility. The City should also inform the public of the possible modifications that can be provided to make programs, services, and activities accessible.
- Include a nondiscrimination statement and a notice of alternative formats on application or registration forms.
- Periodically review program eligibility requirements to ensure accessibility proactively. Develop strategies for modifications as appropriate.
- Review requirements of City volunteer programs to ensure that people with disabilities are included to the maximum extent possible.

2.9 Transportation Services

Many public agencies provide public transportation services. The public accommodation standards for these services are set forth by the Federal Transit Administration (FTA). The requirements under Title 49 CFR Parts 27, 37, 38, and 39 (www.ecfr.gov/current/title-49) include a broad spectrum of legislation that addresses nondiscrimination policies, vehicle and equipment use, programs and services, and transit routes, as well as oversight, complaints, and monitoring (FTA C 4710.1). The scope of the review of this self-evaluation addresses any potentially discriminatory practices under Title 28 CFR Part 35 – Nondiscrimination on the Basis of Disability in State and Local Government Services. The transit stop facilities owned and managed by the City of Albany are included as part of the right-of-way transition plan assessment process for this effort.

Policy Review Summary

The PDF application form available for download for the Call-A-Ride Paratransit Service is not in a digitally accessible format for screen readers (refer to sections Printed and Online Materials and Website).

Required Actions

- Continue to make reasonable modifications in policies, practices, or procedures for transportation programs when the modifications are necessary to avoid discrimination on the basis of disability or to provide program accessibility to services (28 CFR 35.164; Title 49, Subtitle A, § 38.1 Purpose).

Implementation Strategies

- Periodically review transportation programs to proactively ensure accessibility. Develop strategies for modifications as appropriate.
- Periodically review the bus schedules to ensure service hours can meet the demand for individuals reliant on public transportation.

2.10 Tours and Trips

Many public agencies provide or facilitate tours and trips as part of their service. These tours and trips are subject to Title II regulations. The City is responsible for ensuring that people with disabilities can experience the tour by making modifications upon request.

Policy Review Summary

The evaluation of tours and trips provided by Public Works did not identify barriers for this topic, but required actions are presented to highlight the need to watch for potential future barriers for this category.

Required Actions

- Modify tours and trips upon request to enable people with disabilities to participate (28 CFR 35.130).

Implementation Strategies

- Incorporate opportunities to request accessibility modifications in registration materials for tours or trips.
- Provide information to participants in advance of a tour or trip regarding the destination, transportation method, and other characteristics of the activity so that informed requests for modifications can be made.
- Evaluate the destination of tours or trips and the means of transportation to determine accessibility and any modifications that may be required. If a tour route or a portion of a route is inaccessible and modifications are requested, reroute the tour or provide program modifications that will allow the tour to be experienced (for example, photographs, videos with closed captioning).
- Consider developing alternate accessible tour materials such as braille handouts or screen reader versions of pamphlets, captioned videos or audio transcripts, and having ASL interpreters available by request, and things like touchable materials and maps can enhance the accessibility of the tour.

2.11 Accessible and Adaptive Equipment

Adaptive aids are devices, controls, appliances, or items that make it possible for people with disabilities to improve their ability to function independently and participate in programs, services, and activities offered by the City. For example, a pen, note pad, and clipboard provided to a person with a speech disability to write notes for brief communication or electronic equipment such as an accessible computer station are considered adaptive equipment.

Policy Review Summary

Information on how to request auxiliary aides and services for participation in Public Works programs and services is not explicitly indicated on the website nor on materials but a link to the ADA planning process and the City's ADA page is provided.

Required Actions

- Provide and maintain, in working order, accessible equipment for people with disabilities when equipment is provided to the public (28 CFR 35.133).
- Make reasonable modifications to avoid discrimination on the basis of disability unless the modifications would fundamentally alter the nature of the service, program, or activity (28 CFR 35.130).
- Provide appropriate auxiliary aids and services in a timely manner, giving primary consideration to the request of the individual with the disability (28 CFR 35.160).

Implementation Strategies

- Include accessibility as a criterion for purchasing equipment such as furniture, site furnishings, and office systems. Whenever possible, evaluate furniture and building material purchases for compatibility with a wide range of disabilities and sensitivities.
- Review equipment provided by the city for use by the public, such as computers, copy machines, telephones, etc., to identify potential barriers to accessibility and corresponding solutions.
- Collaborate with community organizations that serve people with disabilities to develop and maintain a resource list of assistive technology and accessible equipment.
- Establish and maintain a toolkit of adaptive aids and resources for staff who interact with the public. Include information about both onsite and contracted services.

2.12 Printed and Online Materials

Many public agencies develop and distribute a wide range of materials in printed and online formats. To meet the ADA's effective communication standards, (28 CFR 35.160-164) the City must be able to provide alternative formats such as easy-to-understand language, braille, large print, audiotape or CD, computer media, or other formats, when requested. This responsibility extends to outside contractors and vendors who develop materials on behalf of the City.

Policy Review Summary

The Public Works department provides permit and license applications, request forms, maps, and general project information, all of which are available on the City's website. Some documents available for download do not read properly using read-aloud software functions. Inaccessible document elements can include fonts, styles, images, maps, reading order, tables, and color contrast. Other components, such as maps and complicated language, can be inaccessible for people with certain disabilities. Additionally, some Public Works forms provided on the website are not produced in a fillable format and may also be inaccessible.

Required Actions

- Ensure alternative formats to printed and online information is made available upon request, addressing each request on an individual basis (28 CFR 35.160).
- Ensure assistance is provided upon request in filling out forms when alternative formats are unavailable or infeasible (28 CFR 35.130).
- Continue to ensure that costs for alternative formats and modifications are not assigned to a person with a disability making the request (28 CFR 35.130).

Implementation Strategies

- Include a notice on public materials printed by the City, similar to the following that contains up to date Disability Access Coordinator contact information:
This publication can be made available in alternative formats, such as large print, braille, or electronic format. Requests can be made by calling the Disability Access Coordinator at [telephone] (voice) or by using the 711 Telecommunications Relay Service, or email adacoordinator@cityofalbany.net. Please allow 72 hours for your request to be processed.
- Develop a formal standard for the accessibility of printed and online materials and create or identify resources for achieving this standard across all departments. Ensure that this standard includes oversight for externally created materials and strategies for making existing online materials accessible.
- Develop and implement standard templates for producing accessible City materials that are consistent with City branding and style.
- Train staff to provide printed and online information in alternative formats for people with various disabilities to ensure that requests are handled in a uniform and consistent manner. Incorporate strategies for materials with complex language or other elements such as charts, graphs, maps, and other images.
- Include images of people with disabilities when images of people are included in City printed materials.

2.13 Website

As people turn to the internet as their primary source of information regarding services, programs, activities, and facilities, the City's website takes on increased importance as a communications tool. Providing public access to City publications online is an effective means of reaching people with disabilities (www.ada.gov/websites2.htm). Accessibility standards for electronic and information technology covered by Section 508 of the Rehabilitation Act Amendments of 1998 have set forth the technical and functional performance criteria necessary for such technology to be accessible (Title 29, Chapter 16, § 794d). As of 2018, the technical requirements of Section 508 incorporate the Web Content Accessibility Guidelines (WCAG), including WCAG 2.0 A and AA. The WCAG guidelines are considered the best practice for web accessibility and provide the industry standards for accessible web content. In March of 2022, the DOJ updated the guidance on accessible websites for Title II entities reaffirming websites and their content must be in compliance with the ADA to provide equal access and effective communication.

Policy Review Summary

The City's Website Accessibility page indicates that the City is working to achieve WCAG 2.0 A compliance. A preliminary assessment of the Department's webpage using WAVE (WebAIM's Web Accessibility Evaluation Tool) indicated that some links and form labels do not provide alternative text. Some links also have poor color contrast, which is important for individuals with various visual disabilities. Additionally, web formatting errors were also identified, including unordered (bulleted) lists.

Required Actions

- Take appropriate steps to ensure that the city's online communication with people with disabilities is as effective as other communications with the public and ensure compliance with Section 508 digital accessibility standards (28 CFR 35.160).
- Ensure that people with disabilities are not excluded from participating in or benefitting from the City's online services, programs, or activities (28 CFR 35.160).

Implementation Strategies

- Provide information on the city website about the accessibility of facilities.
- Acquire the technological resources or staffing expertise to create accessible digital documents for posting on the city website.
- Develop a formal standard for website accessibility and create or identify resources for achieving this standard across all departments. Ensure that this standard includes oversight for externally created web pages and incorporates strategies for making accessibility updates to existing web pages.
- Periodically conduct web accessibility analyses to measure the accessibility of the city's websites periodically. Consider adopting standards that meet or exceed WCAG 2.0 AA for the accessibility of electronic information.

2.14 Televised and Audiovisual Information

Televised and audiovisual information is a means for disseminating public information through presentations produced by the City. All televised and audiovisual information, including PowerPoint presentations, must be accessible to people with disabilities. As more communication is done remotely through the internet, it is increasingly important that all communication tools maintain accessibility as technology changes.

Policy Review Summary

Albany streams City Council meetings on the City's YouTube and Facebook pages during the COVID-19 pandemic and holds various commission meetings via Zoom. The Public Works department posts informational videos on the YouTube page and additional content to the Facebook page. While these platforms contain some built-in services such as captioning, communications with people with disabilities may not be as effective as with others.

Required Actions

- Provide alternative formats upon request to audiovisual presentations produced by the City or its contractors or vendors (28 CFR 35.160).
- Ensure that televised and audiovisual communications with people with disabilities is as effective as televised and audiovisual communications with others (28 CFR 35.160).

Implementation Strategies

- Review City presentations, videos, and recordings of meetings to identify potential barriers to accessibility and corresponding solutions.
- Ensure auto-captioning of online video content is edited for accuracy.
- Encourage presenters to read the slides and describe the graphic content when presenting PowerPoint or other visual presentations.
- Ensure content presented in videos and other presentations can easily be made available in alternative accessible formats, such as transcriptions.

2.15 Telecommunications

Technological advances such as cell phones, texting, and instant messaging are changing the tools that many people use to communicate. However, provision of alternative communication technologies such as teletypewriters (TTY), telecommunication display devices (TDDs), or relay services (TRS) is still required under the ADA for communicating with the public.

Policy Review Summary

Phone contact information for various Public Works divisions and staff members is located in multiple places on the website. Contact information does not include TTY or other similarly accessible telecommunications methods. The City website does provide a general TTY/711 link at the bottom of every page.

Required Actions

- Ensure that staff is proficient in the use of alternative communication technologies such as TTY, TDDs, or TRS, or are able to direct the public to knowledgeable staff (28 CFR 35.161).
- Ensure that city publications that list phone numbers also include information on how people who are deaf or who have hearing loss or speech disorders can communicate with the city by phone (28 CFR 35.161; 28 CFR 35.163).
- Ensure that telecommunications with people with disabilities is as effective as communications with others (28 CFR 35.161; 28 CFR 35.163).
- Ensure that responses to calls from a telecommunications relay service are handled in the same manner as responding to other telephone calls (28 CFR 35.161; 28 CFR 35.163).

Implementation Strategies

- Train staff on the use of alternative communication technologies.
- Explore options for Video Remote Interpreting Services (VRI) for communicating with people who are deaf, have hearing loss, or speech disorders. There are many situations where a live interpreter is required, such as in medical situations, but VRI can be a convenient, flexible, lower-cost alternative to live interpreters.

2.16 Emergency Planning

Life and safety protocols and procedures are required to include plans for people with disabilities. The City is responsible for ensuring that staff are aware of these procedures and are trained to implement them during an emergency. Issues that have the greatest impact on people with disabilities include:

- Notification;
- Evacuation;
- Emergency transportation;
- Access to medications, refrigeration, and back-up power;
- Access to their mobility devices or service animals while in transit; and
- Access to information.

In planning for emergency services, the City is required to develop strategies for notifying and assisting people with the widest range of disabilities. The City is responsible for ensuring that staff are aware of these procedures and are trained to implement them during an emergency.

Policy Review Summary

Emergency management is the responsibility of the Fire Department. Public Works provides support to emergency services as needed. Emergency Information regarding the City's emergency plan is contained in the City's Emergency Operations Plan (EOP) and the Natural Hazard Mitigation Plan. The City's EOP references issues of accessibility in general terms. The review involved comparing the plan to the Department of Justice checklist for emergency management and did not involve a review of training materials, contracts, or the facilities designated for use during an emergency. The review process was unable to verify the effective inclusion of disability topics using the checklist to evaluate the following:

- Planning for Emergency Notification and Evacuation
- Training First Responders, Staff, and Volunteers
- Physical Accessibility in Emergency Shelter Programs
- Policies and Procedures in Emergency Shelters
- Medical and Social Services
- Post-Sheltering Policies and Procedures
- Post-Emergency Repair, Rebuilding, and Resumption of Program Operations

Required Actions

- Include strategies for people with disabilities in various types of emergency situations when developing guidelines and a plan for emergency evacuations (28 CFR 35.130; 28 CFR 35.149).
- Train staff to safely evacuate people with disabilities in various types of emergency situations when developing guidelines and a plan for emergency evacuations (28 CFR 35.130; 28 CFR 35.149).
- Provide direct access to telephone emergency services, including 911 services, for people who use TDD's and computer modems (28 CFR 35.162).
- If the City becomes involved in providing emergency shelters, provide emergency sheltering programs that are accessible to people with disabilities (28 CFR 35.130; 28 CFR 35.149).

Implementation Strategies

- Review existing procedures dealing with emergencies to ensure that people with disabilities can be alerted and that they can alert emergency service providers.
- Work with organizations that support people with disabilities to explore the use of technologies such as audible exit signs for orientation and direction or vibrating paging systems.
- Develop plans that consider the needs of people using mobility aids such as wheelchairs, walkers, canes, crutches, or other power-driven mobility devices, or those with limited stamina. Plans should also address those who use oxygen or respirators, those who are blind or have low vision, people who are deaf or have hearing loss, people who have a cognitive disability, people with mental illness, and those with other types of disabilities.
- Test the City's emergency plan and evacuation procedures with periodic drills, both announced and unannounced. Enlist people with different disabilities to role-play during emergency simulations.
- Incorporate the following elements into emergency planning for individual facilities:
 - Address what to do when an alarm is triggered, or emergency evacuation is required;
 - Establish meeting places for assistance and evacuation chairs;
 - Provide direction on what to do if assistance is not available; and
 - Establish floor captains.

2.17 Facilities

City facilities should be accessible to people with different types of disabilities. A public entity is not necessarily required to make each of its existing facilities accessible, where other methods are effective in achieving program access. However, they must ensure that each service, program, or activity, when viewed in its entirety (28 CFR 35.160), is readily accessible to and usable by individuals with disabilities. The identification of structural barriers in facilities such as buildings, parks, and the public rights-of-way are a required element of an ADA Transition Plan.

Policy Review Summary

The City can ensure the maintenance requirements for facilities in the right-of-way by following the required actions and implementation strategies below.

Required Actions

- Ensure that the public can obtain information regarding the existence and location of accessible facilities, entrances, and elements within facilities (28 CFR 35.163).
- Provide and maintain, in working order, features of facilities required to be accessible and usable for people with disabilities (28 CFR 35.133).
- Ensure that people with disabilities are not excluded from programs due to the inaccessibility of City facilities (28 CFR 35.149)
- Prioritize methods of achieving facility accessibility that offer the most integrated setting appropriate for people with disabilities (28 CFR 35.149).
- Design and construct new facilities or new parts of facilities to meet accessibility requirements (28 CFR 35.151(a)).
- Ensure that alterations to facilities meet accessibility requirements to the maximum extent feasible (28 CFR 35.151(b)).
- Make reasonable modifications to permit the use of mobility devices, including other power-driven mobility devices, unless they cannot be operated in accordance with the City's adopted safety requirements for pedestrian facilities (28 CFR 35.137(b)(1)).

Implementation Strategies

- Provide information about the accessibility of City-owned and operated facilities on city publications, including city websites. This can include details about accessible entrances, bathrooms, and other elements.
- Provide online mapping information that includes the accessibility status of right-of-way facilities identified as part of this Plan.
- Provide information about the accessibility of non-City facilities hosting City programs and services and City-owned facilities that are leased to other entities.
- Record and monitor requests relating to facility access. The Disability Access Coordinator can analyze accessibility requests periodically to look for global issues that can be addressed and problems than can be solved proactively.
- Identify or hire staff members tasked with accessibility plan review.

2.18 Accessibility Practices in the Right-of-Way

The self-evaluation questionnaire regarding design and construction practices indicates that Public Works has been successful in the design and construction of accessible facilities in the right-of-way. However, based on the responses this success relies heavily on the knowledge of senior staff without a set of workflows to monitor and track the City's efforts to meet its obligations under the ADA. Albany staff may face some challenges with implementing and documenting the ADA self-evaluation and transition plan when it is completed, especially if there is turnover or changes with the current staffing.

General

Respondents widely revealed that their workgroups use contractors or consultants to plan, design, engineer, inspect, or maintain facilities. When asked how the City ensures that ADA responsibilities are met by external partners, respondents referenced the City's standard specifications, which reflect ADA requirements, and indicated that projects are assigned to a City engineer representative who reviews all designs for consistency. Respondents again mentioned the City's standards as a means for communicating ADA requirements to consultants, developers, and contractors. Others indicated that accessibility requirements are communicated during design meetings and with written review of plans, while some did not know how they were conveyed.

Respondents reported that they generally do not observe differences between the accessibility components in the design plans and the accessibility features as constructed. One respondent noted "tight spaces" as a common cause for why the design of the accessibility components cannot be implemented as shown in the plans. Respondents indicated that there is no formal procedure for documenting and tracking designs or installations that do not comply with ADA requirements. Some said that they have not yet seen a design or installation occur that could not achieve compliance, referencing Albany's "fairly flat landscape," and that if new facilities do not comply, they are demolished and rebuilt.

When asked for staffing recommendations to assist the City in meeting ADA requirements, respondents broadly agreed that current staff is capable of meeting these requirements. Some suggested that ADA trainings would equip staff with the necessary tools and knowledge to achieve consistently accessible installations. Another respondent advocated for developing procedures and checklists to assist staff with ADA requirements. Respondents indicated that they do not depend on external consultants to resolve ADA questions, instead relying on internal expertise, specifically engineering staff.

Recommendations:

Mechanisms for accountability, such as a process for assigning responsibility that ADA standards are met and documentation of variances in design is completed, is not comprehensively developed. The following are best practices for the City's consideration.

- Establish and delegate staff responsibilities for accessibility.
 - Disability Access Coordinator, department ADA leads, support staff as technical resources, etc.
- Provide staff training on accessibility requirements for design and inspection.
 - Include training on updated design standards, checklists, and deviation request/maximum extent feasible documentation.
 - Provide an understanding of accessibility requirements not only for developing designs but also to review designs by others.
- Develop a Decision/Review Process Flow Chart for Accessibility Requirements
- Include accessibility scope language for procurement.
 - Accessibility Requirements Package for Consultants or reference the City's Engineering Standards for detailed accessibility requirements after updating Division A General and Drafting Engineering Standards Section A3.0 with more detailed accessibility requirements.
 - Address accessibility requirements for use in contracted work, both design and construction.
- Continue to act as liaison between citizens and Oregon Department of Transportation for any specific concerns about ODOT facilities within the City of Albany.

Design and Review

Regarding procedures for reviewing plans and specifications for right-of-way projects, respondents indicated that project plans are reviewed at three stages: an initial scoping meeting, a 50% review meeting, and a 90% review meeting. At each phase, the appropriate department leads are given the chance to review the project design. Respondents repeatedly referenced the City's standards and specifications when asked how the City ensures consistency in the application of accessibility standards across projects. Some respondents said Public Works requires the submittal of a proposed temporary pedestrian access route (TPAR) for all projects in the right-of-way, but more said they were unsure whether that was the case for every project. Respondents indicated that traffic control plans must include provisions for signed pedestrian detours around sidewalk closures, which are reviewed by construction inspectors and engineering staff, but no formal procedure or checklist for reviewing proposed TPAR plans was noted.

Recommendations:

To ensure that facilities are continually designed to the minimum accessibility standards, develop the following plan review procedures.

- Develop a Proposed Plan Checklist for Permanent and Temporary Accessibility for Developers and City Reviewers.
- Identify requirements designers must address on their plans for permanent accessibility measures (e.g., detailed curb ramp design, spot elevations, slopes, etc.)
- Require designers to provide a temporary traffic control (TTC), and temporary pedestrian access route (TPAR) plan to confirm feasibility during construction on complex projects as directed by the City engineer.
- Develop a Curb Ramp Decision Matrix/Flow Chart for developers and city reviewers.
- Identify triggers for curb ramp improvements as well as exceptions for installing curb ramps.
- Develop an Accessibility Deviation Request Procedure for situations where total compliance is not feasible for developers and city staff.
- Provide guidance as to what is and is not considered maximum extent feasible.
- Require designers (both consultants and city staff) to complete form justifying any ADA features that do not meet Albany design standards.
- Establish a system for documenting and tracking maximum extent feasible requests and determinations.

Construction and Maintenance

Regarding the process for reviewing installations in the right-of-way for compliance with accessibility requirements, respondents indicated that inspection staff check all elements for compliance with the applicable standard drawings or details using a smart level and tape measure. A couple respondents mentioned inspecting concrete forms before concrete is poured as one way they ensure installations meet requirements. Others expressed uncertainty about the procedure for reviewing installations for accessibility requirements. Responses varied when asked how it is determined if non-compliant installations were constructed to the maximum extent feasible, with some respondents deferring to the engineering department. Respondents indicated that non-compliant installations in the right-of-way are required to be demolished and reinstalled if a design exception has not been granted and it is feasible with existing conditions, or when altered by other construction activities (e.g., non-compliant curb ramps are replaced when the adjacent roadway is altered).

Most respondents indicated that installation of TPARs is required on all construction projects in the right-of-way, though some expressed uncertainty. Similarly, most said TPARs are inspected on all construction projects in the right-of-way, though some were doubtful. With regard to how often TPARs are inspected, responses varied, indicating they are inspected after initial installation and periodically during construction, and that any concerns are addressed immediately.

Recommendations:

- To ensure consistency across projects:
 - Develop a TPAR (Temporary Pedestrian Access Route) Review Checklist.
 - Develop a TTC (Temporary Traffic Control) Review Checklist.
 - Develop a Curb Ramp Inspection Form.
 - Form to be uploaded to Albany GIS database for tracking purposes.
 - Develop an Accessible Pedestrian Signal Inspection Checklist for construction and inspection of APSs.

Standards and Specifications Review Summary

To assess the department's compliance with right-of-way standards for accessibility, a review was undertaken of the City of Albany details. The review included markups of the Standard Construction Specifications, Engineering Standards, and Standard Drawings, with comments identifying recommended revisions. The review documents are available under separate cover and can be requested by contacting the Disability Access Coordinator.

Recommendations:

- Adding standards for several features not currently addressed, including:
- Details requiring accessible parking in the right-of-way;
- Details and design standards for crosswalks;
- Bus shelter placement standard plans or specific design requirements in the City's Engineering Standards to detail accessibility requirements of bus stops and bus shelters.
- Detailing required minimum width, minimum depth, and placement of detectable warnings at curb ramps.
- In locations where additional right-of-way cannot be purchased or there are other existing constraints preventing the minimum sidewalk width requirements, recommend identifying an absolute minimum of 48" clear width (or 60" min clear width) around obstructions such as signs or mailboxes in the ROW, as well as adding requirements addressing protrusion of these features from posts into the pedestrian route.
- Avoid placing manhole covers, storm drains, catch basins, and other utility structures in the pedestrian access route, such as sidewalks and crosswalks, when possible. When manhole covers, storm drains, catch basins, and other utility structures are required to be located in the pedestrian access route, confirm they adhere to PROWAG's surface requirements. When these structures prevent meeting accessibility standards, ensure maximum extent feasible (MEF) documentation is completed.
- Maintain current practice of requiring a submittal of a signed survey with plans that meets a list of minimum requirements to show there is adequate survey for design of all right-of-way improvements. Survey requirement checklist was not reviewed. Ensure survey checklist requires adequate grade information in area of proposed curb ramps, pedestrian pushbuttons, etc. as well as adequate grade information of existing companion ramps.

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- Requiring any proposed curb ramps that cannot meet all accessibility design requirements to be clearly identified on the plans with a brief MEF summary.
- Develop curb ramp design exception request form to track and document proposed curb ramps that cannot meet minimum design requirements.
- Develop curb ramp inspection form for inspection of installed curb ramp using to be used for accepting right-of-way improvements.
- Clarifying that traffic control includes providing a temporary pedestrian accessible route (TPAR) where sidewalks and pedestrian crossings are closed and requiring contractors to submit a TPAR plan to the City.
- Developing a crosswalk closure policy or address in the City's Engineer Standards.
- Develop standard language for contracts outlining contractors shall consult with engineer prior to and during preparation of curb ramps and other features to trouble shoot issues prior to placement of concrete. Include language that the contractor shall collaborate with the City to finalize curb ramp design in the field.

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3. Transition Plan

The process of developing an ADA transition plan includes identifying access barriers within the built environment. This Plan is the first phase of the process and includes the facilities in the right-of-way managed by the Public Works Department. Facilities outside of the right-of-way such as parks and buildings are under evaluation as this Plan is developed, and the remaining citywide facilities will be evaluated during the spring and summer of 2022.

3.1 Facilities in the Public Right-of-Way

The City of Albany evaluated City maintained pedestrian facilities in the public right-of-way for ADA barriers in the spring and summer of 2021. The evaluation assessed curb ramps, sidewalks, pedestrian hazards, crosswalks, pedestrian pushbuttons and street crossing times, transit stops, and on-street parking for accessibility barriers. Pedestrian hazards include changes of level, driveway cross slopes greater than two percent overhanging and protruding objects, opens greater than one-half inch and/or parallel to the direction of travel, obstacles that narrow the width of the accessible route, and surfaces that are not firm, stable, and slip resistant. The evaluations were completed using city staff and a consultant team equipped with measuring devices, city facility data, and evaluation checklists. The field observations were collected into a geospatial database. This section summarizes each of the types of facilities evaluated and summarizes the information collected.

Accessibility Standards

At the time of the facilities evaluations, the 2010 ADA Standards, 2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG), and the 2009 r1 and r2 Manual on Uniform Traffic Control Devices (MUTCD), and the 2018 Oregon Transportation Commission (OTC) Standards for Accessible Parking Spaces, incorporated as part of the 2019 Oregon Structural Specialty Code (OSSC) were used to evaluate and identify barriers at right-of-way facilities under the City's responsibility. Codes and standards are revised every few years. The barrier evaluations are conducted to assess existing conditions as viewed by the current code and provide a baseline for future barrier removal.

Public Right-of-Way Prioritization

Draft prioritization criteria for assigning the barrier removal phasing schedule were developed using Title II regulation § 35.150(d)(2).

If a public entity has responsibility or authority over streets, roads, or walkways, its transition plan shall include a schedule for providing curb ramps or other sloped areas where pedestrian walks cross curbs, giving priority to walkways serving entities covered by the Act, including State and local government offices and facilities, transportation, places of public accommodation, and employers, followed by walkways serving other areas.

The draft prioritization criteria include the following:

- Locations serving government offices and public facilities;
- Locations serving transportation;
- Locations serving commercial districts and employers; and
- Locations serving other areas.

In addition to the above four criteria, the location of a citizen ADA complaint or request has been added and assigned the highest priority.

Priorities for Barrier Removal

Matrices on the following pages illustrate the prioritization criteria for curb ramps, pedestrian access routes, pedestrian crossing times and pushbuttons, transit stop, and on-street parking barrier removal projects in the City's public right-of-way. Each facility evaluated was assigned a rank based on its barrier priority and category. Pedestrian access route information includes identified barriers along the sidewalks, crosswalks, and includes the identifications of hazards along the pedestrian route. The priority assigned is based on the aforementioned criteria, and the barrier category is based on the condition of the facility. The descriptions for each category are provided after each matrix.

The highest-ranked facilities are shaded in dark grey, medium ranked in a lighter shade of grey, and lower-ranked in the lightest shade of grey. The facilities with no assigned rank have no access deficiencies identified and have no assigned color. The columns in the matrix indicate the assigned priority and are in order of importance from left to right, with the left column having the highest importance. The rows indicate the category of condition assigned to each facility during the evaluation process, with the top row having the highest importance. Note that categories are hierarchical: higher-level categories (i.e., one and two) may include lower-level category conditions (i.e., three and four), but lower-level categories cannot include higher-level category conditions.

The categories of barriers for curb ramps and pedestrian access routes have been organized by identified ADA barrier and by road classification. There are three road classifications within Albany including principal/minor arterial, major/minor collector, and local streets. Arterial and collector streets have a higher volume and speed of vehicular traffic when compared to local streets. The pedestrian crossing times and pushbuttons categories are organized by ADA barrier and MUTCD standard and guidance. A standard in the MUTCD is required or mandatory to be followed and guidance in the MUTCD is recommended but not mandatory (2009 Edition, Manual on Uniform Traffic Control Devices, Including Revision 1, and Revision 2 dated May 2012, Section 1A.13 Definitions of Headings, Words, and Phrases in this Manual). Each matrix is followed by a description of the barrier categories; maps illustrating the locations of identified barriers by priority; and summary tables of the barrier removal priorities.

ADA Self-Evaluation and Transition Plan for the Public Right-of-Way

Table 1.1: Curb Ramp Priority Matrix

ADA 35.150(d) Geospatial Proximity Priorities

The priorities listed under columns B, C, D, and E are specified under Title II 28 CFR § 35.150

Priorities (Category)	Priority Description (next section)	A: Location of Citizen ADA Complaint and/or Request	B: Location Serving Government Offices and Public Facilities	C: Location Serving Transportation	D: Location Serving Commercial Districts, Employers	E: Location Serving Other Areas
1	Refer to Table 1.2: Category 1 Description	A1: High Priority	B1: High Priority	C1: High Priority	D1: High Priority	E1: Medium Priority
2	Refer to Table 1.3: Category 2 Description	A2: High Priority	B2: High Priority	C2: High Priority	D2: Medium Priority	E2: Medium Priority
3	Refer to Table 1.4: Category 3 Description	A3: High Priority	B3: Medium Priority	C3: Medium Priority	D3: Medium Priority	E3: Low Priority
4	Refer to Table 1.5: Category 4 Description	A4: High Priority	B4: Low Priority	C4: Low Priority	D4: Low Priority	E4: Low Priority
5	Refer to Table 1.5: No Deficiencies Identified	A5	B5	C5	D5	E5

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Table 1.2: Curb Ramp Category 1 Condition Descriptions

Identified ADA Barrier	Road Classification and Category (Y-Axis): Principal / Minor Arterial	Road Classification and Category (Y-Axis): Major / Minor Collector	Road Classification and Category (Y-Axis): Residential
The curb ramp is built-up in the travel lane.	Category 1	Category 1	Category 2
The curb ramp is significantly damaged or deteriorated and is unsafe.	Category 1	Category 1	Category 2
There is a sidewalk with no curb ramp access or there is an obstruction to accessing the curb ramp.	Category 1	Category 1	Category 2
The curb ramp or pedestrian refuge island has no detectable warning.	Category 1	Category 1	Category 2
Non-standard ramp type with non-compliant cross slope and/or ramp slope.	Category 1	Category 2	Category 3
The curb ramp does not have a firm, stable, and slip resistance surface and/or has openings greater than a half-inch or parallel with the direction of travel.	Category 1	Category 2	Category 3
There is a grade break on the ramp surface.	Category 1	Category 2	Category 3
Counter slope of the curb ramp is greater than five percent.	Category 1	Category 2	Category 3
The width and length of the pedestrian refuge island does not meet any standard.	Category 1	Category 2	Category 3
The curb ramp has no receiving ramp.	Category 1	Category 2	Category 3

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Table 1.3: Curb Ramp Category 2 Condition Descriptions

Identified ADA Barrier	Road Classification and Category (Y-Axis): Principal / Minor Arterial	Road Classification and Category (Y-Axis): Major / Minor Collector	Road Classification and Category (Y-Axis): Residential
The curb ramp is not located within marked crossings (when present).	Category 2	Category 3	Category 3
Cross slope of ramp exceeds two percent.	Category 2	Category 3	Category 3
Running slope of ramp exceeds 8.33 percent.	Category 2	Category 3	Category 3
Cross slope of ramp exceeds two percent and grade of road when located midblock or at an intersection without yield or stop control.	Category 2	Category 3	Category 3
Slope of ramp flared sides (if applicable) exceeds 10 percent and is part of the circulation path.	Category 2	Category 3	Category 3
Width of ramp is less than 48 inches.	Category 2	Category 3	Category 3
A clear space at the bottom of the ramp outside of the travel lane is not provided.	Category 2	Category 3	Category 3
Curb ramp has turning space/top landing area that does not meet any existing standards or a turning space/top landing is not provided.	Category 2	Category 3	Category 3
The curb ramp has a lip or vertical discontinuity greater than a half-inch.	Category 2	Category 3	Category 3

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The detectable warning provided meets no existing standard or is damaged.	Category 2	Category 3	Category 3
The length of surface between detectable warnings on a pedestrian refuge island is less than 24 inches.	Category 2	Category 3	Category 3

Table 1.4: Curb Ramp Category 3 Condition Descriptions

Identified ADA Barrier	Road Classification and Category (Y-Axis): Principal / Minor Arterial	Road Classification and Category (Y-Axis): Major / Minor Collector	Road Classification and Category (Y-Axis): Residential
Curb ramp with constrained turning space is less than four-by-five feet, or turning space/top landing is less than four-by-four feet or slopes exceed maximum standard.	Category 3	Category 4	Category 4
A clear space at the bottom of the ramp is provided outside of the travel lane but is less than four by four feet in area.	Category 3	Category 4	Category 4
The detectable warning provided does not meet PROWAG standard or is present but damaged.	Category 3	Category 4	Category 4
Slope of ramp flared sides (if applicable) exceeds 8.33 percent and is less than or equal to 10 percent and is part of the circulation path.	Category 3	Category 4	Category 4

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Table 1.5: Curb Ramp Category 4 Condition Descriptions

Identified ADA Barrier	Road Classification and Category (Y-Axis): Principal / Minor Arterial	Road Classification and Category (Y-Axis): Major / Minor Collector	Road Classification and Category (Y-Axis): Residential
The width and length of the pedestrian refuge island does not meet PROWAG standard.	Category 4	Category 4	Category 4
End of walk due to road terminating with no exit ramp.	Category 4	Category 4	Category 4
End of walk midblock with no exit ramp.	Category 4	Category 4	Category 4
The curb ramp has a lip or vertical discontinuity less than a half-inch.	Category 4	Category 4	Category 4
Turning space is not designed to prevent the accumulation of water.	Category 4	Category 4	Category 4
Slope of ramp flared sides (if applicable) exceeds 10 percent and is not a part of the circulation path.	Category 4	Category 4	Category 4

Table 1.6: Curb Ramp Category 5 Condition Descriptions

Identified ADA Barrier	Road Classification and Category (Y-Axis): Principal / Minor Arterial	Road Classification and Category (Y-Axis): Major / Minor Collector	Road Classification and Category (Y-Axis): Residential
No deficiencies identified.	Category 5	Category 5	Category 5
Shared diagonal perpendicular or shared parallel curb ramp design without existing physical constraints.	Category 5	Category 5	Category 5

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In the print version of the document map inserted, please refer to PDF Addendum, Map 1: Pedestrian Access Route Barrier Removal Projects Curb Ramps. Alternative text associated with the map:

Map 1 image description: this map illustrates the location of curb ramp barrier removal projects in Albany. A series of colored dots mark the location of curb ramp barriers that are the responsibility of the City of Albany to remove, ranging from low priority to high priority, and including curb ramps with no deficiencies identified. High priority curb ramps are marked with an orange dot, medium priority curb ramps are marked with a pale orange dot, low priority curb ramps are marked with a lavender dot, and curb ramps with no deficiencies are marked with a purple dot. For context, streets are marked in solid gray lines, parks are filled in solid green, water features are filled in solid blue, and the city limits are marked with a dark green dashed and dotted line. The north arrow points upwards and the scale notes half and one-mile increments. Refer to Tables 1.1 through 1.8 in the ADA Self-Evaluation and Transition Plan for the Public Right-of-Way document for corresponding data and matrices.

Table 1.7: Curb Ramp Barrier Summary by Rank

Rank	Total Curb Ramps	Percent of Total
High	1,710	29.1%
Medium	2,086	35.5%
Low	1,923	32.7%
No Deficiency	153	2.6%
Total	5,872	100.0%

In addition to the facilities identified in Table 1.7, there are 391 locations along T-intersections that will require further traffic and design analysis to determine the need for a curb ramp installation.

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Table 1.8: Curb Ramp Barrier Summary by Rank and Category

Rank	Category	Priority	Total Curb Ramps	Percent of Total
High	1	B1	49	0.8%
High	1	C1	328	5.6%
High	1	D1	10	0.2%
High	2	B2	91	1.5%
High	2	C2	1,232	21.0%
Medium	1	E1	93	1.6%
Medium	2	D2	37	0.6%
Medium	2	E2	697	11.9%
Medium	3	B3	132	2.2%
Medium	3	C3	1,084	18.5%
Medium	3	D3	43	0.7%
Low	3	E3	1,238	21.1%
Low	4	B4	30	0.5%
Low	4	C4	251	4.3%
Low	4	D4	38	0.6%
Low	4	E4	366	6.2%
No Deficiencies	5	B5	20	0.3%
No Deficiencies	5	C5	44	0.7%
No Deficiencies	5	D5	17	0.3%
No Deficiencies	5	E5	72	1.2%

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Table 1.9: Pedestrian Access Route Priority Matrix

ADA 35.150(d) Geospatial Proximity Priorities

The priorities listed under columns B, C, D, and E are specified under Title II 28 CFR § 35.150

Priorities (Category)	Priority Description (next section)	A: Location of Citizen ADA Complaint and/or Request	B: Location Serving Government Offices and Public Facilities	C: Location Serving Transportation	D: Location Serving Commercial Districts, Employers	E: Location Serving Other Areas
1	Refer to Table 1.10: Category 1 Description	A1: High Priority	B1: High Priority	C1: High Priority	D1: High Priority	E1: Medium Priority
2	Refer to Table 1.11: Category 2 Description	A2: High Priority	B2: High Priority	C2: High Priority	D2: Medium Priority	E2: Medium Priority
3	Refer to Table 1.12: Category 3 Description	A3: High Priority	B3: Medium Priority	C3: Medium Priority	D3: Medium Priority	E3: Low Priority
4	Refer to Table 1.13: Category 4 Description	A4: High Priority	B4: Low Priority	C4: Low Priority	D4: Low Priority	E4: Low Priority
5	Refer to Table 1.14: No Deficiencies Identified	A5	B5	C5	D5	E5

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Table 1.10: Pedestrian Access Route Category 1 Condition Descriptions

Identified ADA Barrier	Road Classification and Category (Y-Axis): Principal / Minor Arterial	Road Classification and Category (Y-Axis): Major / Minor Collector	Road Classification and Category (Y-Axis): Residential
A detectable warning surface is not provided at the railroad crossing.	Category 1	Category 1	Category 1
Railroad flangeway gap is greater than three inches for freight rail or two and a half for non-freight rail.	Category 1	Category 1	Category 1
The sidewalk condition is poor with cracking, spalling, heaving, or other condition.	Category 1	Category 2	Category 2
The constructed width of the sidewalk width is less than 36 inches.	Category 1	Category 2	Category 2
The sidewalk cross slope is below two percent for less than one-quarter of its length.	Category 1	Category 2	Category 2
Running slope of crosswalk is greater than five percent.	Category 1	Category 2	Category 2
Cross slope of crosswalk with yield or stop control is greater than two percent.	Category 1	Category 2	Category 2
Cross slope of crosswalk with no yield or stop control is greater than five percent.	Category 1	Category 2	Category 2
Crosswalk surface is not firm, stable, and slip resistant.	Category 1	Category 2	Category 2
The sidewalk surface is firm, stable, and slip-resistant for less than one-quarter of its length.	Category 1	Category 2	Category 2
The sidewalk has a significant number of vertical changes that exceed a quarter inch –and– openings greater than a half inch or are parallel to direction of travel (more than three per 100 feet).	Category 1	Category 2	Category 2

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The sidewalk has a significant number of overhanging– and– protruding objects (more than one per 100 feet).	Category 1	Category 2	Category 2
The sidewalk has a significant number of driveway entries where cross slope exceeds two percent (more than two per 100 feet).	Category 1	Category 2	Category 2
The sidewalk has a significant number obstacles that narrow the width of the walk to less than four feet (more than one per 100 feet).	Category 1	Category 2	Category 2
The sidewalk has a significant number utility lids that are not slip-resistant (more than one per 100 feet).	Category 1	Category 2	Category 2

Table 1.11: Pedestrian Access Route Category 2 Condition Descriptions

Identified ADA Barrier	Road Classification and Category (Y-Axis): Principal / Minor Arterial	Road Classification and Category (Y-Axis): Major / Minor Collector	Road Classification and Category (Y-Axis): Residential
Detectable warning surface placement at rail crossing is less than six feet or greater than 15 feet.	Category 2	Category 2	Category 2
The constructed width of the sidewalk width is less than 48 inches but greater than 36 inches.	Category 2	Category 3	Category 3
The sidewalk has a significant number of instances where running slope exceeds grade of road and is >5.0% (more than one per 100 feet).	Category 2	Category 3	Category 3
The sidewalk cross slope is below two percent for one-quarter to one-half of its length.	Category 2	Category 3	Category 3
The sidewalk surface is firm, stable, and slip-resistant for one-quarter to one-half of its length.	Category 2	Category 3	Category 3

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The sidewalk has a significant number of vertical changes that exceed a quarter inch –or– openings greater than a half inch or are parallel to direction of travel (more than three per 100 feet).	Category 2	Category 3	Category 3
The sidewalk has a significant number of overhanging –or– protruding objects (more than one per 100 feet).	Category 2	Category 3	Category 3
The sidewalk has a significant number of driveway entries where cross slope exceeds two percent (more than one per 100 feet).	Category 2	Category 3	Category 3
The sidewalk has an obstacle that narrow the width of the walk to less than four feet (fewer than one per 100 feet).	Category 2	Category 3	Category 3
The sidewalk has utility lids that are not slip-resistant (fewer than one per 100 feet).	Category 2	Category 3	Category 3

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Table 1.12: Pedestrian Access Route Category 3 Condition Descriptions

Identified ADA Barrier	Road Classification and Category (Y-Axis): Principal / Minor Arterial	Road Classification and Category (Y-Axis): Major / Minor Collector	Road Classification and Category (Y-Axis): Residential
The sidewalk width is less than five feet without a passing space.	Category 3	Category 4	Category 4
The sidewalk has a number of instances where running slope exceeds grade of road and is >5.0% (fewer than one per 100 feet).	Category 3	Category 4	Category 4
The sidewalk cross slope is below two percent for one-half to three-quarters of its length.	Category 3	Category 4	Category 4
The sidewalk surface is firm, stable, and slip-resistant for one-half to three-quarters of its length.	Category 3	Category 4	Category 4
The sidewalk has vertical changes that exceed a quarter inch –or– openings greater than a half inch or are parallel to direction of travel (fewer than three per 100 feet).	Category 3	Category 4	Category 4
The sidewalk has a significant number of overhanging –or– protruding objects (fewer than one per 100 feet).	Category 3	Category 4	Category 4
The sidewalk has a significant number of driveway entries where cross slope exceeds two percent (fewer than one per 100 feet).	Category 3	Category 4	Category 4

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Table 1.13: Pedestrian Access Route Category 4 Condition Descriptions

Identified ADA Barrier	Road Classification and Category (Y-Axis): Principal / Minor Arterial	Road Classification and Category (Y-Axis): Major / Minor Collector	Road Classification and Category (Y-Axis): Residential
The sidewalk cross slope is below two percent for three-quarters to its length.	Category 4	Category 4	Category 4
The sidewalk surface is firm, stable, and slip-resistant for three-quarters to its length.	Category 4	Category 4	Category 4

Table 1.14: Pedestrian Access Route Category 5 Condition Descriptions

Identified ADA Barrier	Road Classification and Category (Y-Axis): Principal / Minor Arterial	Road Classification and Category (Y-Axis): Major / Minor Collector	Road Classification and Category (Y-Axis): Residential
No deficiencies identified.	Category 5	Category 5	Category 5

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In the print version of the document map inserted, please refer to PDF Addendum, Map 2: Pedestrian Access Route Barrier Removal Projects Sidewalks, Map 3: Pedestrian Access Route Barrier Removal Projects Crosswalks, and Map 4: Pedestrian Access Route Barrier Removal Projects Railroad Crossings. All three maps illustrate the location of pedestrian access route barrier removal projects by barrier topic in Albany.

Alternative text associated with the maps: A series of colored dots mark the location of barriers that are the responsibility of the City of Albany to remove, ranging from low priority to high priority, and including pedestrian facilities with no deficiencies identified. On all maps, high priority facilities are marked with an orange dot, medium priority facilities are marked with a pale orange dot, low priority facilities are marked with a lavender dot, and facilities with no deficiencies are marked with a purple dot. For context, streets are marked in solid gray lines, parks are filled in solid green, water features are filled in solid blue, and the city limits are marked with a dark green dashed and dotted line. The north arrow points upwards and the scale notes half and one-mile increments. Refer to Tables 1.9 through 1.20 in the ADA Self-Evaluation and Transition Plan for the Public Right-of-Way document for corresponding data and matrices.

Table 1.15: Pedestrian Access Route Barrier Summary by Rank - Sidewalks

Rank	Total Sidewalk Segments	Percent of Total
High	1,144	27.2%
Medium	1,396	33.2%
Low	1,578	37.6%
No Deficiency	84	2.0%
Total	4,202	100.0%

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Table 1.16: Pedestrian Access Route Barrier Summary by Rank and Category - Sidewalks

Rank	Category	Priority	Total Sidewalk Segment	Percent of Total
High	1	B1	4	0.1%
High	1	C1	142	3.4%
High	2	B2	52	1.2%
High	2	C2	946	22.5%
Medium	1	E1	20	0.5%
Medium	2	D2	32	0.8%
Medium	2	E2	639	15.2%
Medium	3	B3	68	1.6%
Medium	3	C3	609	14.5%
Medium	3	D3	28	0.7%
Low	3	E3	802	19.1%
Low	4	B4	34	0.8%
Low	4	C4	223	5.3%
Low	4	D4	22	0.5%
Low	4	E4	497	11.8%
No Deficiencies	5	B5	9	0.2%
No Deficiencies	5	C5	24	0.6%
No Deficiencies	5	D5	4	0.1%
No Deficiencies	5	E5	47	1.1%

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Table 1.17: Pedestrian Access Route Barrier Summary by Rank - Crosswalks

Rank	Total Crosswalks	Percent of Total
High	730	21.2%
Medium	273	7.9%
No Deficiency	2,449	70.9%
Total	3,452	100.0%

Table 1.18: Pedestrian Access Route Barrier Summary by Rank and Category - Crosswalks

Rank	Category	Priority	Total Crosswalks	Percent of Total
High	1	C1	43	1.2%
High	2	B2	72	2.1%
High	2	C2	615	17.8%
Medium	2	D2	27	0.8%
Medium	1	E1	1	0.0%
Medium	2	E2	245	7.1%
No Deficiencies	5	B5	149	4.3%
No Deficiencies	5	C5	986	28.6%
No Deficiencies	5	D5	43	1.2%
No Deficiencies	5	E5	1,271	36.8%

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Table 1.19: Pedestrian Access Route Barrier Summary by Rank – Railroad Crossings

Rank	Total Railroad Crossings	Percent of Total
High	100	77.5%
Medium	25	19.4%
No Deficiency	4	3.1%
Total	129	100.0%

Table 1.20: Pedestrian Access Route Barrier Summary by Rank and Category - Railroad Crossings

Rank	Category	Priority	Total Railroad Crossings	Percent of Total
High	1	B1	5	3.9%
High	1	C1	83	64.3%
High	1	D1	6	4.7%
High	2	C2	6	4.7%
Medium	1	E1	25	19.4%
No Deficiencies	5	C5	3	2.3%
No Deficiencies	5	E5	1	0.8%

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Table 1.21: Pedestrian Crossing Time and Pushbuttons Priority Matrix

ADA 35.150(d) Geospatial Proximity Priorities

The priorities listed under columns B, C, D, and E are specified under Title II 28 CFR § 35.150

Priorities (Category)	Priority Description (next section)	A: Location of Citizen ADA Complaint and/or Request	B: Location Serving Government Offices and Public Facilities	C: Location Serving Transportation	D: Location Serving Commercial Districts, Employers	E: Location Serving Other Areas
1	Refer to Table 1.22: Category 1 Description	A1: High Priority	B1: High Priority	C1: High Priority	D1: Medium Priority	E1: Medium Priority
2	Refer to Table 1.22: Category 2 Description	A2: High Priority	B2: Medium Priority	C2: Medium Priority	D2: Medium Priority	E2: Low Priority
3	Refer to Table 1.22: Category 3 Description	A3: High Priority	B3: Medium Priority	C3: Medium Priority	D3: Low Priority	E3: Low Priority
4	Refer to Table 1.22: No Deficiencies Identified	A4	B4	C4	D4	E4

Table 1.22: Pedestrian Crossing Time and Pushbutton Barrier Condition Descriptions

Category 1:

- Accessible pedestrian signal is not provided (PROWAG R209).
- Pedestrian crossing time is insufficient (2009 MUTCD 4E.06).

Category 2 (2009 MUTCD Standard):

- Level clear space at push button not provided.
- Reach to push button from clear space is obstructed.
- Operating force of pushbutton exceeds five pounds of force.
- The pushbutton does not have a sign adjacent to or integral with the pushbutton.
- Pushbutton sign does not clearly indicate which crosswalk signal is actuated.
- Pushbutton pilot light (if applicable) does not activate.
- A locator tone is not provided.
- A tactile arrow is not provided.
- Pushbutton locator tone activates or deactivates at incorrect time.
- Pushbutton locator tone duration and intensity needs adjustment.
- Audible features of accessible pedestrian signal needs adjustment.
- Speech walk message of accessible pedestrian signal needs adjustment.

- Extended pushbutton feature needs adjustment.

Category 3 (2009 MUTCD Guidance):

- Pushbutton is located more than 10 feet from curb, shoulder, or pavement.
- Pushbutton is farther than five feet from the crosswalk line farthest from the intersection (when applicable).
- Pushbutton height is not within 42 to 48 inches above the ground.
- Pushbutton and arrow are not parallel with the direction of travel.
- Distance between two pushbuttons on the same corner is less than 10 feet.

Category 4:

- No deficiencies identified.

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In the print version of the document map inserted, please refer to PDF Addendum, Map 5: Barrier Removal Projects Pedestrian Crossing Time and Map 6: Barrier Removal Projects Pedestrian Pushbuttons.

Alternative text associated with the maps:

Map 5 Image Description: this map illustrates the location of pedestrian crossing time barrier removal projects at timed crossings with pedestrian signals in Albany. A series of colored dots mark the location of crossing time barriers that are the responsibility of the City of Albany to remove. High priority locations are marked with an orange dot, medium priority locations are marked with a pale orange dot, low priority locations are marked with a lavender dot, and locations with no deficiencies are marked with a purple dot.

Map 6 illustrates the location of pedestrian pushbutton barriers at pedestrian crossings. A series of colored dots mark the location of pushbutton barriers that are the responsibility of the City of Albany to remove, ranging from low priority to high priority, and including pushbuttons with no deficiencies identified. High priority pushbuttons are marked with an orange dot, medium priority pushbuttons are marked with a pale orange dot, low priority pushbuttons are marked with a lavender dot, and pushbuttons with no deficiencies are marked with a purple dot.

For context, streets are marked in solid gray lines, parks are filled in solid green, water features are filled in solid blue, and the city limits are marked with a dark green dashed and dotted line. The north arrow points upwards and the scale notes half and one-mile increments. Refer to Tables 1.21 through 1.25 in the ADA Self-Evaluation and Transition Plan for the Public Right-of-Way document for corresponding data and matrices.

Table 1.23: Pedestrian Crossing Time Barrier Summary

Rank	Total Pedestrian Signals	Percent of Total
High	9	11.8%
Medium	0	0.0%
Low	0	0.0%
No Deficiency	67	88.2%
Total	76	100.0%

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Table 1.24: Pedestrian Pushbutton Barrier Summary

Rank	Total Pedestrian Pushbuttons	Percent of Total
High	106	69.7%
Medium	35	23.0%
Low	8	5.3%
No Deficiency	3	2.0%
Total	152	100.0%

Table 1.25: Pedestrian Crossing Time and Pushbuttons Summary of Categories

Rank	Category	Priority	Total Pushbuttons and Pedestrian Signals	Percent of Total	Pedestrian Crossing Time is Insufficient	Identified Issue with MUTCD Standard	Identified Issue with MUTCD Guidance
High	1	B1	11	4.8%	0	11	10
High	1	C1	104	45.6%	4	104	96
Medium	2	B2	6	2.6%	0	4	4
Medium	2	C2	24	10.5%	0	12	19
Medium	3	C3	3	1.3%	0	0	3
Medium	1	E1	2	0.9%	0	2	2
Low	2	E2	8	3.5%	0	7	4
No Deficiencies	4	B4	2	0.9%	0	0	0
No Deficiencies	4	C4	58	25.4%	0	1	0
No Deficiencies	4	E4	10	4.4%	0	0	0

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Table 1.26: Transit Stop Priority Matrix

ADA 35.150(d) Geospatial Proximity Priorities

The priorities listed under columns B, C, D, and E are specified under Title II 28 CFR § 35.150 (d). Transit stops are transportation facilities and as such all transit stops are prioritized in columns A, B, or C

Priorities (Category)	Priority Description (next section)	A: Location of Citizen ADA Complaint and/or Request	B: Location Serving Government Offices and Public Facilities	C: Location Serving Transportation	D: Location Serving Commercial Districts, Employers	E: Location Serving Other Areas
1	Refer to Table 1.27: Category 1 Description	A1: High Priority	B1: High Priority	C1: High Priority	Not applied	Not applied
2	Refer to Table 1.27: Category 2 Description	A2: High Priority	B2: Medium Priority	C2: Medium Priority	Not applied	Not applied
3	Refer to Table 1.27: No Deficiencies Identified	A3	B3	C3	Not applied	Not applied

Table 1.27: Transit Stop Barrier Condition Descriptions

Category 1:

- Accessible route connecting to the bus boarding and alighting area is not provided.
- Bus boarding and alighting has incorrect dimensions or is missing.
- Bus shelter and required clear space is not connected to the boarding and alighting area with an accessible route.
- Bus shelter does not provide a clear space.

Category 2:

- Bus boarding and alighting area slopes do not meet the standard.
- Bus route sign protrudes into the pedestrian clearway.
- Bus route sign does not have a non-glare finish.
- Bus route sign lacks contrast.
- Bus route sign text characters do not meet size and spacing requirements.
- Bus shelter clear space is provided but has the incorrect dimensions within the shelter.
- Bus shelter clear space does not have a firm, stable, and slip-resistant surface.

Category 3:

- No deficiencies identified.

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In the print version of the document map inserted, please refer to PDF Addendum Map 7: Barrier Removal Projects Transit Stops. Alternative text associated with the map: Map 7 illustrates the location of the assessed transit stops in Albany. A series of colored dots mark the location of transit stop barriers that are the responsibility of the City of Albany to remove, ranging from medium priority to high priority. High priority transit stops are marked with an orange dot and medium priority transit stops are marked with a pale orange dot. For context, streets are marked in solid gray lines, parks are filled in solid green, water features are filled in solid blue, and the city limits are marked with a dark green dashed and dotted line. The north arrow points upwards and the scale notes half and one-mile increments. Refer to Tables 1.26 through 1.29 in the ADA Self-Evaluation and Transition Plan for the Public Right-of-Way document for corresponding data and matrices.

Table 1.28: Transit Stop Barrier Summary

Rank	Total Transit Stops	Percent of Total
High	10	45.5%
Medium	9	40.9%
No Deficiency	3	13.6%
Total	22	100.0%

Table 1.29: Transit Stop Summary of Categories

Rank	Category	Priority	Total Transit Stops	Percent of Total	Identified Barrier Boarding and Alighting Area	Identified Barrier Sign	Identified Barrier Shelter
High	1	B1	2	9.0%	2	0	2
High	1	C1	8	36.4%	8	1	7
Medium	2	B2	3	13.6%	2	0	12
Medium	2	C2	6	27.3%	2	1	13
No Deficiency	3	B3	1	4.5%	0	0	1
No Deficiency	3	C3	2	9.0%	0	0	1

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Table 1.30: On-Street Parking Priority Matrix

ADA 35.150(d) Geospatial Proximity Priorities

The priorities listed under columns B, C, D, and E are specified under Title II 28 CFR § 35.150

Priorities (Category)	Priority Description (next section)	A: Location of Citizen ADA Complaint and/or Request	B: Location Serving Government Offices and Public Facilities	C: Location Serving Transportation	D: Location Serving Commercial Districts, Employers	E: Location Serving Other Areas
1	Refer to Table 1.31: Category 1 Description	A1: High Priority	B1: High Priority	C1: High Priority	D1: Medium Priority	E1: Medium Priority
2	Refer to Table 1.31: Category 2 Description	A2: High Priority	B2: Medium Priority	C2: Medium Priority	D2: Medium Priority	E2: Low Priority
3	Refer to Table 1.31: No Deficiencies Identified	A3	B3	C3	D3	E3

Table 1.31: On-Street Parking Barrier Condition Descriptions

Category 1:

- Parking location is not at the corner when an access aisle is not provided.
- Number of accessible parking spaces provided where marked parking is provided is insufficient.
- Access aisle not provided when pedestrian circulation width is greater than 14 feet.
- Access aisle present without a curb ramp available.
- Width of parking space is insufficient.
- Pavement parking or access aisle markings are not provided.
- Parking sign not provided.

Category 2:

- Access aisle does not meet the size standards.
- Access aisle surface is not firm, stable, and slip-resistant
- Pavement markings are present but do not meet the standard.
- Parking sign does not meet the standard.
- Parking sign height is too low.
- Parking sign is incorrectly located.

Category 3:

- No deficiencies identified.

ADA Self-Evaluation and Transition Plan for the Public Right-of-Way

In the print version of the document a map is inserted, please refer to PDF Addendum, Map 8: Barrier Removal Projects On-Street Parking. Alternative text associated with the map:

Map 8 illustrates the location of on-street parking barriers removal projects in Albany. An inset map is located in the lower right corner of the map. The inset map is an enlarged portion of the map which includes several blocks just south of the Willamette River, between NW Water Avenue, SE Montgomery Street, Pacific Boulevard SE or the 99 E, and SW Calapooia Street. A series of colored dots mark the location of on-street parking barriers that are the responsibility of the City of Albany to remove, ranging from no deficiencies identified to high priority. High priority on-street parking spots are marked with an orange dot, medium priority on-street parking spots are marked with a pale orange dot, and on-street parking spots with no deficiencies are marked with a purple dot. For context, streets are marked in solid gray lines, parks are filled in solid green, water features are filled in solid blue, and the city limits are marked with a dark green dashed and dotted line. The north arrow points upwards and the scale notes half and one-mile increments. Refer to Tables 1.30 through 1.33 in the ADA Self-Evaluation and Transition Plan for the Public Right-of-Way document for corresponding data and matrices.

Table 1.32: On-Street Parking Barrier Summary

Evaluation of available designated accessible on-street parking spaces.

Rank	Total Parking Spots	Percent of Total
High	16	39.0%
Medium	25	26.961.0%
Low	0	0.0%
No Deficiency	0	0.0%
Total	41	100.0%

ADA Self-Evaluation and Transition Plan for the Public Right-of-Way

Table 1.33: On-Street Parking Summary of Categories

Rank	Category	Priority	Total Parking Spaces	Percent of Total	Identified Barrier Parking Location	Identified Barrier Parking Space Dimension	Identified Barrier Pavement Markings	Identified Barrier Access Aisle and/or Curb Ramp	Identified Barrier Sign
High	1	B1	8	19.5%	0	2	8	1	2
High	1	B2	2	4.9%	0	0	1	0	2
High	1	C1	5	12.2%	1	0	3	2	2
High	1	C2	1	2.4%	0	0	0	0	1
Medium	2	B2	3	7.3%	0	0	3	0	3
Medium	3	B3	7	17.1%	0	0	0	0	0
Medium	2	D2	1	2.4%	0	0	1	0	1
Medium	3	D3	1	2.4	0	0	0	0	0
Medium	3	C3	116	39.0%	0	0	0	0	5

ADA Self-Evaluation and Transition Plan for the Public Right-of-Way

Table 1.34: On-Street Parking Block Analysis

Priority	Barrier Removal Category	Feet of Unmarked Metered Parking	# Marked Spaces	# Accessible Parking Spaces Provided	# Accessible Spaces Required by R214	# Accessible Spaces Needed	Block
B1	High	70	3	0	1	1	2
B1	High	266	13	1	2	1	9
B1	High	189	9	0	1	1	11
B1	High	720	33	1	3	2	16
B1	High	46	2	0	1	1	18
B1	High	598	28	2	3	1	19
B1	High	450	19	1	2	1	21
B1	High	601	29	1	3	2	25
B1	High	474	21	1	2	1	26
B1	High	1077	50	2	5	3	30
B1	High	200	10	0	1	1	31
C1	High	100	5	0	1	1	3
C1	High	431	23	1	2	1	7
C1	High	649	31	1	3	2	14
C1	High	625	28	2	3	1	15
C1	High	432	21	1	2	1	17
C1	High	327	16	0	2	2	24
C1	High	358	17	1	2	1	27
C1	High	153	7	0	1	1	29
C1	High	220	9	0	1	1	33
C1	High	233	30	1	2	1	35
C1	High	273	17	0	2	2	37
B3	No deficiencies identified	135	12	1	1	0	6
B3	No deficiencies identified	164	8	1	1	0	10

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Priority	Barrier Removal Category	Feet of Unmarked Metered Parking	# Marked Spaces	# Accessible Parking Spaces Provided	# Accessible Spaces Required by R214	# Accessible Spaces Needed	Block
B3	No deficiencies identified	411	37	3	3	0	12
B3	No deficiencies identified	535	23	2	2	0	20
B3	No deficiencies identified	160	8	1	1	0	28
B3	No deficiencies identified	58	5	1	1	0	38
B3	No deficiencies identified	45	2	2	1	0	39
C3	No deficiencies identified	174	16	1	1	0	1
C3	No deficiencies identified	0	21	1	1	0	5
C3	No deficiencies identified	0	25	1	1	0	8
C3	No deficiencies identified	729	34	3	3	0	13
C3	No deficiencies identified	500	23	2	2	0	22
C3	No deficiencies identified	426	19	2	2	0	23
C3	No deficiencies identified	210	10	1	1	0	34
C3	No deficiencies identified	160	8	1	1	0	36
D3	No deficiencies identified	52	5	1	1	0	4
D3	No deficiencies identified	140	7	1	1	0	32

Total number of accessible parking spaces provided = 41

Total number of accessible spaces required by R214 = 69

Total number of accessible space need = 29

Block 39 has one additional accessible space beyond the minimum required by PROWAG R214. This accounts for the difference between the number needed and the number required minus the number of accessible parking spaces provided.

In the print version of the document a map is inserted, please refer to PDF Addendum Map 9: Barrier Removal Projects On-Street Parking Block Count. Alternative text associated with the map:

ADA Self-Evaluation and Transition Plan for the Public Right-of-Way

Map 9 illustrates the location of on-street parking block count barrier removal project in Albany. This map also indicates the location of the block count in association with Table 1.34 of this document. An inset map is located in the lower right corner of the map. The inset map is an enlarged portion of the map which includes several blocks just south of the Willamette River, between NW Water Avenue, SE Montgomery Street, Pacific Boulevard SE or the 99 E, and SW Calapooia Street.

A series of colored dots mark the location of on-street parking barriers that are the responsibility of the City of Albany to remove, ranging from no deficiencies identified to high priority. High priority on-street parking spots are marked with an orange dot, medium priority on-street parking spots are marked with a pale orange dot, and on-street parking spots with no deficiencies are marked with a purple dot.

For context, streets are marked in solid gray lines, parks are filled in solid green, water features are filled in solid blue, and the city limits are marked with a dark green dashed and dotted line. The north arrow points upwards and the scale notes half and one-mile increments. Refer to Table 1.34 in the ADA Self-Evaluation and Transition Plan for the Public Right-of-Way document for corresponding data.

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Schedule for Public Right-of-Way Improvements

The transition plan for the right-of-way proposes a strategy for removing barriers through a variety of activities such as new construction, roadway alterations, maintenance, and repair projects, and policies that specifically address the removal of ADA barriers. The City can modify or adjust barrier removal priorities to provide flexibility in accommodating community requests, petitions for reasonable modifications from people with disabilities, funding opportunities and constraints, and changes in City programs. The barrier removal strategy incorporates this flexibility and allows the City to respond to new opportunities as they arise.

As part of this planning process, the City developed a GIS inventory of the barriers identified at facilities in the public right-of-way. The resulting inventory is intended to be the living transition plan tracking tool for monitoring the Plan's implementation and tracking the long-term maintenance needs of curb ramps and other facilities within the public right-of-way. The ongoing tracking and monitoring will ensure that the City progresses toward a barrier-free environment in the public right-of-way.

The schedule in this Plan sets a target of 15-years for barrier removal; the City of Albany, however, reserves the right to modify barrier removal priorities in order to allow flexibility in accommodating community requests, petitions for reasonable modifications from persons with disabilities, changes in city programs, and funding opportunities and constraints. Providing a detailed breakdown of projects past the 15-year timeline is subject to numerous changes over such a time span. It is anticipated that overall compliance could be achieved in 25 to 30 years. For all facilities meeting Criterion A: Location of Citizen ADA Complaint or Request will be evaluated and programmed within one year of the request or complaint.

Curb Ramps

Reference Tables 1.1 through 1.8.

- Curb ramps identified as high priority B1, C1, and D1 will be addressed within the next five years. The remaining high priority B2 and C2 curb ramps will be addressed in the next one to 10 years.
- Curb ramps identified as medium priority B3 and C3 will be addressed in the next one to 15-years.
- The remaining ramps in medium and lower priority ramps will be addressed through on-going street maintenance and improvement projects.

It is assumed that as curb ramps are evaluated in greater detail, a percentage of ramps will fall within the safe harbor provisions. These “safe harbor” ramps will help reduce the deficient ramp inventory. The City will then revise the curb ramp transition plan schedule for the removal of the remaining barriers, update the curb ramp inventory, and revise the transition plan schedule for the removal of remaining barriers on a regular basis.

Sidewalks

Reference Tables 1.9 through 1.16.

- Sidewalks that will be addressed in the next 15-years are as follows:
 - All sidewalks within high priority B1, C1, B2, and C2 sidewalks will be addressed;
 - Category 2 sidewalks meeting Criterion B: Location Serving Government Offices & Public Facilities and Criterion C: Location Serving Transportation will be addressed in the next one to 15 years.
- The remaining sidewalks in Category 2, 3, and 4 will be addressed through on-going pavement management and improvement projects and via sidewalk maintenance and repair.

Crosswalks and Railroad Crossings

Reference Tables 1.9, 1.17 through 1.20.

- Crossings that will be addressed in the next 15-years are as follows:
 - Crossings within high priority B1, C1, D1 will be reviewed for further design analysis and addressed;
 - Crossings meeting Criterion B: Location Serving Government Offices & Public Facilities and Criterion C: Location Serving Transportation (B2 and C2) will be addressed in the next one to 15 years.
- The remaining crossing in Category 2, 3, and 4 will be addressed through on-going pavement management and improvement projects.

Pedestrian Crossing Time and Pushbuttons

Reference Tables 1.21 through 1.25.

- The pedestrian crossing time barriers identified in this plan will be addressed within one to two-years of the Plan's implementation.
- The barriers identified at pedestrian pushbutton facilities will be replaced in conjunction with associated curb ramp upgraded.
- The City intends to develop an accessible pedestrian signal and replacement policy to ensure that pushbuttons are replaced when the signal controller and software are altered, or the signal head is replaced.

Transit Stops

Reference Tables 1.26 through 1.29.

At the time of the writing of this Plan, the Transit Department is in the process of developing new bus routes to better serve the public. This will result in transit stops being added and some being eliminated. New transit stops will be designed and constructed to meet the accessibility standards. The transit stops that remain in the same location will be addressed as follows.

- The City will remove the identified sign barriers within the first three years of the implementation of the Plan.
- Category 1 boarding and alighting area barriers will be addressed within the first five years of the Plan.
- Any remaining Category 2 barriers will be reviewed and addressed and scheduled for removal upon completion of the bus route realignment.

On-Street Parking

Reference Tables 1.30 through 1.34.

- On-street parking spaces identified as high priority B1 and C1 will be addressed within the next five years.
- On-street parking spaces identified as medium priority B2, C2, and D3 involve sign parking sign and pavement marking barriers and these barriers will be removed during ongoing maintenance activities.

Approach for Barrier Removal in the Right-of-Way

The City plans to address public right-of-way facility barriers through multiple strategies.

- The City will continue to take barrier removal requests and complete upgrades that can be completed within the adopted budget and increase revenue that will feed into replacement of curb ramps per year. The City will continue to provide a dedicated budget category for ADA barrier removal in the public right-of-way in its adopted budget. This money will be used to address barriers that are not being resolved through other mechanisms. Barrier removal addressed by this strategy will be prioritized based on the criteria in this transition plan.
- The ADA section in the Capital Improvement Program will be updated to include a summary of deficiencies identified in the transition plan, and listed in the Unfunded projects list
- The City currently has in place a pavement management program that aids in the selection of scheduled roadway rehabilitation and maintenance projects. The City plans to review public right-of-way barriers during the implementation of its Capital Improvement Program and address those barriers that can be resolved as part of the ongoing pavement maintenance and rehabilitation program.
- The summary tables included in the ADA transition plan will be checked for deficiencies for all new and reconstruction projects, in addition to field work to access the corridor in order to remove identified barriers.
- The City will consider the development of a maintenance program for sidewalks.
- The City will explore policy options that engage property owners in the maintenance of the sidewalks adjacent to their properties.
- The City will actively seek out and apply for grant funding specific to removal of access barriers when available.

3.2 Park and Citywide Facilities

Placeholder section.

Accessibility Standards

Placeholder section.

Priorities for Barrier Removal

Placeholder section.

Schedule for Park and Citywide Facilities

Placeholder section.

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4. Barrier Removal Considerations for Plan Implementation

Title II of the ADA requires a public entity to “operate each service, program or activity so that the service, program or activity, when viewed in its entirety, is readily accessible to and usable by individuals with disabilities.” (28 CFR 35.150) This requirement does not:

- Necessarily require a public entity to make each of its existing facilities accessible to and usable by individuals with disabilities;
- Require a public entity to take any action that would threaten or destroy the historic significance of an historic property; or
- Require a public entity to take any action that it can demonstrate would result in a fundamental alteration in the nature of a service, program, or activity or impose undue financial and administrative burdens.

4.1 Triggers for Barrier Removal

The responsibility for ensuring barrier removal will reside with the Disability Access Coordinator, or designee. This process will be accomplished with two strategies: policy and procedure modifications to remove programmatic barriers to be coordinated by the City’s Disability Access Coordinator, and maintenance and construction projects to remove structural barriers to be coordinated by the Department heads over the operating areas in which the structural barriers exist. Two conditions determine when barriers must be removed: to provide access to programs, activities, and services, and when a facility is altered.

Program Accessibility

A public entity must ensure that individuals with disabilities are not excluded from services, programs, and activities because existing buildings are inaccessible. A state or local government’s programs, when viewed in their entirety, must be readily accessible to and usable by individuals with disabilities. This standard, known as program accessibility (28 CFR 35.151(b)), applies to facilities of a public entity that existed on January 26, 1992. Public entities do not necessarily have to make each of their existing facilities accessible. They may provide program accessibility through a number of methods including alteration of existing facilities, acquisition or construction of additional facilities, relocation of a service or program to an accessible facility, or provision of services at alternate accessible sites.

Public Right-of-Way Alterations and New Construction

In an alteration or new construction project in the public right-of-way, the City must incorporate ADA accessibility standards to the maximum extent feasible (28 CFR 35.151(b)). As part of the Plan’s implementation, the City’s Public Works Department should document all design exceptions.

The ADA Title II toolkit incorporates the following guidance about sidewalks and curb ramps:

- When pre-ADA streets or sidewalks are altered, space limitations may restrict the ability to install accessible curb ramps. In these cases, the installed curb ramps must comply with the ADA to the maximum extent feasible, but there are still requirements to meet.
- In rare instances when it is technically infeasible to install a fully compliant curb ramp during alterations to pre-ADA roadways and walkways because of physical or site constraints, state and local governments must still provide accessibility to the maximum extent feasible. Before reaching a conclusion about technical infeasibility, public entities should consider the extent to which physical or site constraints can be addressed by alternative curb ramp designs. The burden of proving technical infeasibility lies with the state or local government that constructed it.
- When highways, streets, and roads are built or altered post-ADA, they must have curb ramps at certain locations: wherever there are curbs or other barriers to entry from a pedestrian walkway or sidewalk, wherever there are curbs or other barriers to entry at any designated pedestrian crosswalks that are located mid-block, wherever sidewalks or walkways intersect with highways, streets, or roads and pedestrians may legally cross the vehicular way, and at public transportation stops.
- For pre-ADA highways, streets, roads, and sidewalks that have not been altered, public entities may choose to construct curb ramps at every point where a pedestrian walkway intersects a curb, but they are not necessarily required to do so. Alternative routes to buildings may be acceptable where people with disabilities must travel only a marginally longer route than the general public.

Roadway Alterations and Maintenance

The DOJ, in coordination with the US Department of Transportation, specifies that public agencies are required to provide curb ramps or upgrade curb ramps whenever roadways are altered. An alteration is a change that affects or could affect the usability of all or part of a building or facility (28 CFR 35.151(b)(1)). Alterations of streets, roads, or highways include activities such as reconstruction, rehabilitation, resurfacing, widening, and projects of similar scale and effect (2010 ADA Standards, 106.5). In the July 8, 2013, the *“Department of Justice/Department of Transportation Joint Technical Assistance on the Title II of the Americans with Disabilities Act Requirements to Provide Curb Ramps when Streets, Roads, or Highways are Altered through Resurfacing,”* document further articulated maintenance activities on streets, roads, or highways, such as filling potholes, are not alterations and do not trigger barrier removal. The list on the following page distinguishes between roadway alterations versus maintenance activities.

Alteration

- Addition of new layer of asphalt
- Cape seals
- In-place asphalt recycling
- Microsurfacing and thin-lift overlay
- Mill and fill / mill and overlay
- New construction
- Open-graded surface course
- Rehabilitation and reconstruction
- Resurfacing of a crosswalk

Maintenance

- Chip seals
- Crack filling and sealing
- Diamond grinding
- Dowel bar retrofit
- Fog seals
- Joint crack seals
- Joint repairs
- Pavement patching
- Painting or striping
- Scrub sealing
- Slurry seals
- Spot high-friction treatments
- Surface sealing

4.2 Safe Harbor Provisions

The 2010 Standards introduced the concept of safe harbor, a new exception that allows facilities built prior to March 15, 2012 and that were in compliance with the 1991 ADA Standards to remain as-is until a public entity plans an alteration to the structural feature (28 CFR 35.150(b)(2)(i)).

This safe harbor is not a blanket exemption for facilities. If a public entity undertakes an alteration to a primary function area, only the required elements of a path of travel to that area that already comply with the 1991 Standards are subject to the safe harbor. If a public entity undertakes an alteration to a primary function area and the required elements of a path of travel to the altered area do not comply with the 1991 Standards, then the public entity must bring those elements into compliance with the 2010 Standards (28 CFR 35.151(b)(4)(ii)(C)).

This exception applies to elements that might otherwise have to be modified under:

- The program access requirement for public entities;
- The readily achievable barrier removal requirements for places of public accommodation; or
- The path of travel requirement for any alteration that affects the usability of a primary function area in any covered facility.

If a public entity constructed or altered required elements of a path of travel in accordance with the specifications in either the 1991 Standards or the Uniform Federal Accessibility Standards before March 15, 2012, the public entity is not required to retrofit such elements to reflect incremental changes in the 2010 Standards solely because of an alteration to a primary function area served by that path of travel. The 2010 Standards also identify structural elements that do not fall under the safe harbor provision [28 CFR § 35.150(b)(2)(ii)].

4.3 Undue Burden

The City is not required to take any action that it can demonstrate would result in a fundamental alteration in the nature of its program or activity, would create a hazardous condition resulting in a direct threat to the participant or others, or would represent an undue financial and administrative burden (28 CFR 35.150, 28 CFR 35.164).

A determination of undue financial or administrative burden can only be made by the head of a department or his or her designee and must be accompanied by a written statement of the reasons for reaching that conclusion. The determination that undue burdens would result must be based on all resources available for use by the City. If an action would result in such an alteration or such burdens, the City must take any other action that would not result in such an alteration or such burdens but would nevertheless ensure that individuals with disabilities receive the benefits and services of the program or activity.

5. Responsible Employee, Notice Policy, and Grievance Procedure

Title II of the ADA requires a state or local government agency that employs 50 or more people to designate at least one employee to coordinate the City's efforts to implement the plan and provide the name, office address, and telephone number of the staff responsible. Additionally, the City must establish and publish a grievance procedure (28 CFR 35.107) and provide notice to the public information on the protections against discrimination under the ADA (28 CFR 35.107).

5.1 Disability Access Coordinator Roles and Responsibilities

The Disability Access Coordinator is responsible for organizing and communicating the City's efforts to comply with and fulfill its responsibilities under Title II of the ADA, as well as all other applicable state and federal laws. The Disabilities Access Coordinator's responsibilities include investigating complaints that the City has engaged in any action prohibited by Title II. The City has designated an employee to fulfill these responsibilities.

5.2 Notice Under the Americans with Disabilities Act

Title II regulations require the City to inform the public of the rights and protections provided by the ADA for access to public programs, services, and activities. It is the obligation of the head of the public entity to determine the most effective way of providing notice to the public about their rights and the public entity's responsibilities under the ADA. Publishing and publicizing the ADA notice, such as the following, is not a one-time requirement. Public agencies should provide the information on an ongoing basis and update the information whenever necessary. The following is the City of Albany's current notice under the ADA.

Notice Under the Americans with Disabilities Act

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

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

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

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

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

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

Complaints that a program, service, or activity of the City is not accessible to persons with disabilities should be directed to:

Eric Ikenouye, Disability Access Coordinator, 541-791-0171, adacoordinator@cityofalbany.net
333 Broadalbin St SW, Albany, OR 97321

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

5.3 ADA Complaint and Grievance Procedure

The following is the City of Albany's current ADA Complaint and Grievance Procedure.

This Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 ("ADA"). It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of non-employment-related services, activities, programs, or benefits by the City of Albany ("City"). Employees and applicants for employment with the City should follow the City's Personnel Policies and applicable Collective Bargaining Agreements to file employment-related complaints alleging disability discrimination.

ADA Complaints

Complaints that a program, service, or activity of the City of Albany is not accessible to persons with disabilities should be directed to Eric Ikenouye, Disability Access Coordinator, 541-791-0171, adacoordinator@cityofalbany.net, 333 Broadalbin St SW, Albany, OR 97321

The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of complainant and location, date, and description of the problem. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint will be made available for persons with disabilities upon request.

Grievance Procedure

Within 15 calendar days after receipt of the complaint, the Disability Access Coordinator or designee will meet with the complainant to discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting, the Disability Access Coordinator or designee will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of the City and offer options for substantive resolution of the complaint.

If the response by the Disability Access Coordinator or designee does not satisfactorily resolve the issue, the complainant and/or his/her designee may appeal the decision within 15 calendar days after receipt of the response to the City Manager or designee.

Within 15 calendar days after receipt of the appeal, the City Manager or designee will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, the City Manager or designee will respond in writing, and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint.

Timelines for responding to a complaint may be extended at any step of the process when the Disability Access Coordinator or City Manager determines that such an extension is needed to effectively investigate or resolve the complaint. Complainants will be notified of such extensions,

All written complaints received by the Disability Access Coordinator or designee, appeals to the City Manager or designee, and responses from these two offices will be retained by the City for at least five years.

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6. Definitions

The following is a summary of many definitions found in this document and within the ADA. Please refer to the Americans with Disabilities Act for the full text of definitions and explanations (28 CFR 35.104).

Accessible. A site, building, facility, or portion thereof is deemed accessible when it is approachable and usable by persons with disabilities in compliance with technical standards adopted by the relevant Administrative Authority.

Administrative Authority. A governmental agency that adopts or enforces regulations and guidelines for the design, construction, or alteration of buildings and facilities.

Alteration in the Public Right-of-Way. A change to an existing facility that affects or could affect pedestrian access, circulation, or use. Alterations include, but are not limited to, resurfacing, rehabilitation, reconstruction, historic restoration, or changes or rearrangement of structural parts or elements of a facility.

Alternative Text. Refers to the text equivalent for an image appearing in an online document. It is read by screen readers in place of the image so that the content and function of the image is accessible to people with visual or certain cognitive disabilities.

Auxiliary Aids and Services. Refers to ways to communicate with people who have communication disabilities such as blindness, vision loss, deafness, hearing loss, a combination of vision and hearing loss or speech or language disorders. The key to deciding what aid or service is needed to communicate effectively with people with disabilities and their companions is to consider the nature, length, complexity, and context of the communication as well as the person's normal method(s) of communication. Auxiliary aids and services include the use of interpreters, notetakers, readers, assistive listening systems, captioning and TTYs or the provision of alternate formats such as braille, ASCII text, large print, recorded audio and electronic formats like CDs and DVDs.

Blended Transition. A raised pedestrian street crossings, depressed corners, or similar connections between the pedestrian access route at the level of the sidewalk and the level of the pedestrian street crossing that have a grade of 5 percent or less.

Clear Ground Space. The minimum unobstructed ground space required to accommodate a single, stationary wheelchair and occupant. Clear ground space provides a location for a wheelchair user to approach and make use of an element.

Complaint. A complaint is a claimed violation of the ADA.

Cross Slope. The grade that is perpendicular to the direction of pedestrian travel. On a sidewalk, cross slope is measured perpendicular to the curb line or edge of the street or highway.

Curb Line. A line at the face of the curb that marks the transition between the curb and the gutter, street, or highway.

Curb Ramp. A ramp that cuts through or is built up to the curb. Curb ramps can be perpendicular or parallel, or a combination of parallel and perpendicular ramps.

Disability. The term disability means, with respect to an individual:

- A physical or mental impairment that substantially limits one or more of the major life activities of such individual;
- A record of such impairment; or
- Being regarded as having a disability or such impairment.

Disability Access Coordinator. The individual responsible for coordinating the efforts of the government entity to comply with Title II and investigating any complaints that the entity has violated Title II. Also known as Disability Access Manager or Accessibility Manager.

Discrimination on the Basis of Disability. (28 CFR 35.130) Discrimination on the basis of disability means to:

- Limit, segregate, or classify a citizen in a way that may adversely affect opportunities or status because of the person's disability;
- Limit, segregate, or classify a participant in a program or activity offered to the public in a way that may adversely affect opportunities or status because of the participant's disability;
- Participate in a contract that could subject a qualified citizen with a disability to discrimination;
- Use any standards, criteria, or methods of administration that have the effect of discriminating on the basis of disability;
- Deny equal benefits because of a disability;
- Fail to make reasonable modifications to known physical or mental limitations of an otherwise qualified individual with a disability unless it can be shown that the modification would impose an undue burden on the City's operations;
- Use selection criteria that exclude otherwise qualified people with disabilities from participating in the programs or activities offered to the public; and
- Fail to use tests, including eligibility tests, in a manner that ensures that the test results accurately reflect the qualified applicant's skills or aptitude to participate in a program or activity.

Effective Communication. Communication with people who have vision, hearing, and/or speech disabilities that is equally effective as communication with people without disabilities.

Element. An architectural or mechanical component of a building, facility, space, site, or public right-of-way.

Facility. All or any portion of buildings, structures, improvements, elements, and pedestrian or vehicular routes located in the public right-of-way.

Fundamental Alteration. A modification that is so significant that it alters the essential nature of the goods, services, facilities, privileges, advantages, or accommodations offered. If a public

entity can demonstrate that the modification would fundamentally alter the nature of its service, program, or activity, it is not required to make the modification. If a public accommodation (private entity) can demonstrate that a modification would fundamentally alter the nature of the goods, services, facilities, privileges, advantages, or accommodations it provides, it is not required to make the modification.

Grade. The degree of inclination of a surface. Refer to Slope. In public right-of-way, grade is the slope parallel to the direction of pedestrian travel.

Grade Break. The line where two surface planes with different grades meet.

Having a Record of Impairment. An individual is disabled if he or she has a history of having an impairment that substantially limits the performance of a major life activity; or has been diagnosed, correctly or incorrectly, as having such impairment.

International Symbol of Accessibility (ISA). The ISA is recognized worldwide as a symbol identifying accessible elements and spaces. Standards issued under the ADA and ABA Standards reference and reproduce the ISA to ensure consistency in the designation of accessible elements and spaces. Uniform iconography promotes legibility, especially for people with low vision or cognitive disabilities. Guidance on use of the ISA under the ADA is available at <https://www.access-board.gov/files/aba/guides/ISA-guidance.pdf>

Maintenance. Routine or periodic repair of all pedestrian facilities to restore them to the standards to which they were originally designed and built. Maintenance does not change the original purpose, intent, or design of public sidewalks, shared-use paths, curb ramps, crosswalks, pedestrian islands, or other public walkways.

Operable Part. A component of an element used to insert or withdraw objects, or to activate, deactivate, or adjust the element. The technical requirements for operable parts apply to operable parts on accessible pedestrian signals and pedestrian pushbuttons and parking meters and parking pay stations that serve accessible parking spaces.

Other Power-Driven Mobility Device (OPDMD). Any mobility device powered by batteries, fuel, or other engines that is used by individuals with mobility disabilities for locomotion and designed to operate in areas without defined pedestrian routes.

Path of Travel. A path of travel is a continuous, unobstructed way of pedestrian passage by means of which a newly constructed or altered area may be approached, entered, and exited and which connects an area with an exterior approach (including sidewalks, streets, and parking areas), an entrance to the facility and other parts of a facility. An accessible path of travel may consist of walks and sidewalks, curb ramps and other interior or exterior pedestrian ramps; clear floor paths through lobbies, corridors, rooms, and other improved areas; parking access aisles; elevators and lifts; or a combination of these elements. Within the context of alterations, path of travel also includes restrooms, telephones and drinking fountains serving the altered area.

Pedestrian Access Route. A continuous and unobstructed path of travel provided for pedestrians with disabilities within or coinciding with a pedestrian circulation path in the public right-of-way.

Pedestrian Circulation Path. A prepared exterior or interior surface provided for pedestrian travel in the public right-of-way

Physical or Mental Impairments. (28 CFR Appendix B, Test C) Physical or mental impairments may include, but are not limited to, vision, speech and hearing impairments; emotional disturbance and mental illness; seizure disorders; mental retardation; orthopedic and neuromotor disabilities; learning disabilities; diabetes; heart disease; nervous conditions; cancer; asthma; Hepatitis B; HIV infection (HIV condition); and drug addiction, if the addict has successfully completed or is participating in a rehabilitation program and no longer uses illegal drugs.

The following conditions are not physical or mental impairments: transvestitism; illegal drug use; homosexuality or bisexuality; compulsive gambling; kleptomania; pyromania; pedophilia; exhibitionism; voyeurism; pregnancy; height; weight; eye color; hair color; left-handedness; poverty; lack of education; a prison record; and poor judgment or quick temper, if not symptoms of a mental or physiological disorder.

Primary Function. A major activity for which a facility is intended. Areas that contain a primary function include, but are not limited to, the dining area of a cafeteria, the meeting rooms in a conference center, as well as offices and other work areas in which the activities of the public entity using a facility are carried out.

Program Accessibility. A public entity's services, programs, or activities, when viewed in their entirety, must be readily accessible to and usable by individuals with disabilities.

Public Entity. Any state or local government; any department, agency, special-purpose district, or other instrumentality of a state or local government.

Public Right-of-Way. Public land or property, usually in interconnected corridors, that is acquired for or dedicated to transportation purposes.

Qualified Historic Facility. A facility that is listed in or eligible for listing in the National Register of Historic Places or designated as historic under an appropriate state or local law.

Qualified Individual with a Disability. A qualified individual with a disability means an individual with a disability who, with or without reasonable modification to rules, policies, or practices; the removal of architectural, communication, or transportation barriers; or the provision of auxiliary aids and services, meets the essential eligibility requirements for the receipt of services or the participation in programs or activities provided by the City.

Reasonable Modification. (28 CFR 35.130) A public entity must modify its policies, practice, or procedures to avoid discrimination unless the modification would fundamentally alter the nature of its service, program, or activity.

Regarded as Having a Disability. An individual is *disabled* if she or he is treated or perceived as having an impairment that substantially limits major life activities, although no such impairment exists.

Running Slope. The grade that is parallel to the direction of pedestrian travel.

Scoping. Requirements that specify what features are required to be accessible and, where multiple features of the same type are provided, how many of the features are required to be accessible.

Service Animal. Service animals are dogs (and in certain circumstances, miniature horses) that are individually trained to perform tasks for people with disabilities. Examples of such work or tasks include guiding people who are blind, alerting people who are deaf, pulling a wheelchair, alerting, and protecting a person who is having a seizure, reminding a person with mental illness to take prescribed medications, calming a person with Post-Traumatic Stress Disorder (PTSD) during an anxiety attack, or performing other duties. Service animals are working animals, not pets. The work or task a dog has been trained to provide must be directly related to the person's disability. Dogs whose sole function is to provide comfort or emotional support do not qualify as service animals under the ADA. Guidance on the use of the term *service animal* in the 2010 Standards has been published online at https://www.ada.gov/service_animals_2010.htm

Title II regulations now include assessment factors to assist public entities in determining whether miniature horses can be accommodated as service animals in their facilities:

- Whether the miniature horse is housebroken;
- Whether the miniature horse is under the owner's control;
- Whether the facility can accommodate the miniature horse's type, size, and weight; and
- Whether the miniature horse's presence will not compromise legitimate safety requirements necessary for safe operation of the facility.

Slope. Ground surface that forms a natural or artificial incline. Slope is typically conveyed as either a percentage or a ratio that represent the change in elevation between two points of an incline divided by the horizontal distance between the two points.

- Cross Slope: The slope that is perpendicular to the direction of travel.
- Running Slope: The slope that is parallel to the direction of travel.

Substantial Limitations of Major Life Activities. An individual is disabled if she or he has a physical or mental impairment that (a) renders her or him unable to perform a major life activity, or (b) substantially limits the condition, manner, or duration under which she or he can perform a particular major life activity in comparison to other people.

Major life activities are functions such as caring for oneself, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working.

In determining whether physical or mental impairment substantially limits the condition, manner, or duration under which an individual can perform a particular major life activity in comparison to other people, the following factors shall be considered:

- The nature and severity of the impairment;
- The duration or expected duration of the impairment; and
- The permanent or long-term impact (or expected impact) of or resulting from the impairment.

Technical Standards. Specify the design criteria for accessible features, including the specific numbers, conditions, and measurements that are required.

Technically Infeasible. With respect to an alteration of a building or a facility, something that has little likelihood of being accomplished because existing structural conditions would require removing or altering a load-bearing member that is an essential part of the structural frame; or because other existing physical or site constraints prohibit modification or addition of elements, spaces or features that are in full and strict compliance with the minimum requirements.

Telecommunications Display Device (TDD). A telecommunications display device for the deaf (TDD) is an electronic device for text communication via a telephone line, used when one or more of the parties has hearing or speech difficulties. Other names for TDD include TTY.

Telecommunications Relay Service (TRS) or 711. The free, nationwide telecommunications relay service, reached by calling 711, uses communications assistants who serve as intermediaries between people who have hearing or speech disabilities who use a text telephone (TTY) or text messaging and people who use standard voice telephones. The communications assistant tells the telephone user what the other party is typing and types to tell the other party what the telephone user is saying. TRS also provides speech-to-speech transliteration for callers who have speech disabilities.

Text Telephone (TTY). Teletypewriters or text telephones have a keyboard and a visual display for exchanging written messages over the telephone. The ADA established a free, nationwide relay network to handle voice-to-TTY and TTY-to-voice calls, which is reached by calling 711. TTY is a more general term for teletypes but is often referred to as TDD.

Vertical Surface Discontinuities. Vertical differences in level between two adjacent surfaces.

Video Relay Service (VRS). Video relay service (VRS) is a free, subscriber-based service for people who use sign language and have videophones, smart phones, or computers with video communication capabilities. For outgoing calls, the subscriber contacts the VRS interpreter, who places the call and serves as an intermediary between the subscriber and a person who uses a standard voice telephone. The interpreter tells the telephone user what the subscriber is signing and signs to the subscriber what the telephone user is saying.

Wheeled Mobility Device. A manually operated or power-driven device designed primarily for use by an individual with a mobility disability for the main purpose of indoor or of both indoor and outdoor locomotion. Also referred to as a manual wheelchair, a power wheelchair, or an electric scooter.

7. Program Accessibility Guidelines, Standards, and Resources

7.1 Federal, State, and Local Laws, Standards, and Ordinances

Americans with Disabilities Act (ADA) Title II Regulations

Nondiscrimination on the Basis of Disability in State and Local Government Services.

<https://www.ecfr.gov/current/title-28/chapter-1/part-35>

U.S. Department of Justice Civil Rights Division, Disability Rights Section

U.S. Department of Justice Civil Rights Division, Disability Rights Section provides many free ADA materials including the Americans with Disability Act (ADA) text. Printed materials may be

ADA Self-Evaluation and Transition Plan for the Public Right-of-Way

ordered by calling the ADA Information Line [(800) 514-0301 (Voice) or (800) 514-0383 (TTY)]. Publications are available in standard print as well as large print, audiotape, braille, and computer disk for people with disabilities. Documents, including the following publications, can also be downloaded from the Department of Justice website. <http://www.ada.gov/>

- Title II Technical Assistance Manual (1993) and Yearly Supplements. <http://www.ada.gov/taman2.html>
- Accessibility of State and Local Government Websites to People with Disabilities. 2003. <https://www.ada.gov/websites2.htm>
- ADA Best Practices Tool Kit for State and Local Governments. 2008. <https://www.ada.gov/pcatoolkit/abouttoolkit.htm>
- ADA Guide for Small Towns. 2000. <http://www.ada.gov/smtown.htm>
- The ADA and City Governments: Common Problems. 2000. <http://www.ada.gov/comprob.htm>
- ADA Requirements: Effective Communication. 2014. <https://www.ada.gov/effective-comm.htm>
- ADA Requirements: Service Animals. 2010. https://www.ada.gov/service_animals_2010.htm
- ADA Information for Law Enforcement. 2008. <http://www.ada.gov/policeinfo.htm>
- Commonly Asked Questions About the ADA and Law Enforcement. 2006. http://www.ada.gov/q&a_law.htm
- Communicating with People Who are Deaf or Hard of Hearing: ADA Guide for Law Enforcement Officers. 2006. <http://www.ada.gov/lawenfcomm.htm>
- Model Policy for Law Enforcement on Communicating with People Who are Deaf or Hard of Hearing. 2006. <http://www.ada.gov/lawenfmodpolicy.htm>
- Questions and Answers: The ADA and Hiring Police Officers. 1997. <http://www.ada.gov/copsq7a.htm>
- ADA Requirements: Wheelchairs, Mobility Aids and Other Power-Driven Mobility Devices. 2014. <https://www.ada.gov/opdmd.htm>
- An ADA Guide for Local Governments: Making Community Emergency Preparedness and Response Programs Accessible to People with Disabilities. 2008. <https://www.ada.gov/emergencyprepguide.htm>
- Access for 9-1-1 and Telephone Emergency Services. 1998. <http://www.ada.gov/911ta.htm>
- The Americans with Disabilities Act and Other Federal Laws Protecting the Rights of Voters with Disabilities. 2014. https://www.ada.gov/ada_voting/ada_voting_ta.htm
- ADA Checklist for Polling Places. 2016. <https://www.ada.gov/votingchecklist.htm#toc1>

U.S. Access Board

The Access Board is an independent federal agency that promotes equality for people with disabilities through leadership in accessible design and the development of accessibility guidelines and standards. Created in 1973 to ensure access to federally funded facilities, the Board is now a leading source of information on accessible design. The Board develops and maintains design criteria for the built environment, transit vehicles, information and communication technology, and medical diagnostic equipment under the Americans with Disabilities Act of 1990 (ADA) and other laws. It also provides technical assistance and training on these requirements and on accessible design, and continues to enforce accessibility standards that apply to federally funded facilities under the Architectural Barriers Act of 1968 (ABA). <https://www.access-board.gov/>

State of Oregon

The State of Oregon Department of Consumer and Business Services, Building Codes Division establishes the standards for construction through the Oregon Structural Specialty Code adopted pursuant to OAR chapter 918, division 8. As of the writing of this document, the State provisions for accessibility standards are the 2019 Oregon Specialty Structural Code, Chapter 11, and incorporated by reference the ICC/ANSI A117.1-2009 Accessible and Usable Buildings and Facilities, and the Oregon Transportation Commission Standards for Accessible Parking Places August 2018. Because building codes are updated every few years, the City should regularly review changes and update policies and procedures related to accessibility to ensure compliance with current code. <https://www.oregon.gov/bcd/codes-stand/pages/index.aspx>

7.2 Guidance Documents and Articles – Creating Accessible Documents

Adobe Software

- Creating Accessible Adobe PDF Files. <https://helpx.adobe.com/acrobat/using/creating-accessible-pdfs.html>
- Create and verify PDF accessibility (Acrobat Pro). <https://helpx.adobe.com/acrobat/using/create-verify-pdf-accessibility.html>
- Accessibility by product. <https://www.adobe.com/accessibility/products.html>

American Council of the Blind (ACB)

Best Practices and Guidelines for Large Print Documents used by the Low Vision Community. 2011. <http://acb.org/large-print-guidelines>

Braille Authority of North America and the Canadian Braille Authority

Guidelines and Standards for Tactile Graphics (Web Version). 2012. <http://www.brailleauthority.org/tg/web-manual/tgmanual.html>

GSA Government-wide Section 508 Accessibility Program

Create Accessible Electronic Documents (a compilation of federal guidance, checklists, and testing information for creating and maintaining accessible documents in various popular electronic formats, including Word, PDF, Excel, and PowerPoint). <https://www.section508.gov/create/>

Smithsonian Institution

Smithsonian Guidelines for Accessible Publication Design. 2001. <https://www.si.edu/Content/Accessibility/Publication-Guidelines.pdf>

Social Security Administration, Accessibility Resource Center (SSA-ARC)

SSA Guide: Producing Accessible Word and PDF Documents, Version 2.1. 2010. https://www.ssa.gov/accessibility/files/The_Social_Security_Administration_Accessible_Document_Authoring_Guide_2.1.2.pdf

A Guide to Making Documents Accessible to People Who Are Blind or Visually Impaired. 2002.

<http://www.sabeusa.org/wp-content/uploads/2014/02/A-Guide-to-Making-Documents-Accessible-to-People-Who-are-Blind-or-Visually-Impaired.pdf>

University of Washington

Creating Accessible Documents. <https://www.washington.edu/accessibility/documents/>

7.3 Guidance Documents and Articles – Web Design

National Center for Accessible Media (NCAM)

NCAM is a research and development facility dedicated to addressing barriers to media and emerging technologies for people with disabilities in their homes, schools, workplaces, and communities. NCAM is part of the Media Access Group at Boston public broadcaster WGBH, which includes two production units, The Caption Center and Descriptive Video Service (DVS). Tools and guidelines for creating accessible digital media can be found on the NCAM website. <https://www.wgbh.org/foundation/ncam/guidelines/accessible-digital-media-guidelines>

Utah State University, Center for Persons with Disabilities, WebAIM

WebAIM (Web Accessibility in Mind) is a non-profit organization based at the Center for Persons with Disabilities at Utah State University that has provided comprehensive web accessibility solutions since 1999. Documents and training materials, including the following publications, can be downloaded from the WebAIM website. <http://www.webaim.org/>

Web Accessibility Initiative (WAI)

WAI develops guidelines widely regarded as the international standard for Web accessibility, support materials to help understand and implement Web accessibility, and resources, through international collaboration. The Web Content Accessibility Guidelines (WCAG) was developed with a goal of providing a single shared standard for web content accessibility that meets the needs of individuals, organizations, and governments internationally. Documents and training materials, including the following publications, can be downloaded from the WAI website. <https://www.w3.org/WAI/>

7.4 Guidance Documents and Articles – Signage

APH Tactile Graphic Image Library

American Printing House for the Blind, Inc. (APH). The website requires registration for access, and it is free. <http://www.aph.org/tgil/>

Designing for People with Partial Sight and Color Deficiencies

Arditi, Aries. Effective Color Contrast: 2005. https://pages.mtu.edu/~nilufer/classes/cs3611/interesting-stuff/designing-with-colors-1/color_contrast.htm

Signage and the 2010 ADA Standards

Luminant Design LLC. v2.1. 2011. <http://www.luminantdesign.com/ada.html>

Signage Requirements in the 2010 Standards for Accessible Design

Society for Experiential Graphic Design (SEGD). https://segd.org/sites/default/files/SEGD_2012_ADA_White_Paper_Update.pdf

U.S. Department of the Interior, National Park Service – Harpers Ferry Center Accessibility Committee

Harpers Ferry Center (HFC) serves as the Interpretive Design Center for the National Park Service. HFC works to ensure that the highest level of accessibility that is reasonable is incorporated into all aspects of interpretive media, planning, design, and construction. This includes ensuring that all new interpretive media are provided in such a way as to be accessible to and usable by all persons with a disability. It also means all existing practices and procedures are evaluated to determine the degree to which they are currently accessible to all visitors, and modifications are made to assure conformance with applicable laws and regulations. The HFC website includes accessibility resources, guidelines and updates, Department of the Interior Section 504, photographs of best practices, and more. <http://www.nps.gov/hfc/accessibility/>

7.5 Training Resources

ADA National Network

2020. <https://adata.org/ada-training>

Great Lakes ADA Center

2020. <http://www.adagreatlakes.org/ProgramsAndServices/Trainings/>

Northwest ADA Center

2020. <http://nwadacenter.org/training>

United States Access Board

2020. <https://www.access-board.gov/training>

Southeast ADA Center

2020. <http://adasoutheast.org/training/courses.php>

ADA Coordinator Training Certificate Program

2020. <https://www.adacoordinator.org/default.aspx>