



City of Clayton, Missouri
Sidewalk and
Curb Ramp

ADA SELF-EVALUATION & TRANSITION PLAN

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City of Clayton, Missouri

Sidewalk and Curb Ramp ADA SELF-EVALUATION & TRANSITION PLAN

Americans with Disabilities Act (ADA) Information: Materials can be provided in alternative formats by contacting _____, City ADA Coordinator at _____ (voice) _____ (TTY) or _____. Persons who are deaf or hard of hearing may make a request for alternative formats through _____.

TABLE OF CONTENTS:

01/ INTRODUCTION & LEGISLATIVE MANDATE

02/ SELF-EVALUATION OF POLICIES, PRACTICES & PROCEDURES: Requirements, Findings & Recommendations

03/ SELF-EVALUATION OF INFRASTRUCTURE: Sidewalk and Curb Ramps

a. Approach to Inventory Collection & Analysis

- i. Data Collection
- ii. Data Analysis
- iii. Barrier Ranking

b. Summary Report of Sidewalk and Curb Ramp Inventory

c. Sidewalk Inventory

- i. Obstructions
- ii. Changes in Level
- iii. Grade (Running Slope)
- iv. Cross Slope
- v. Sidewalk Barrier Ranking Analysis

d. Signal Inventory

- i. Signal Categories
- ii. Signal Assessments
- iii. Signal Barrier Ranking Analysis

e. Curb Ramp Inventory

- i. Curb Ramp Categories
- ii. Curb Ramp Assessment
- iii. Curb Ramp Barrier Ranking Analysis

f. Island Refuge Inventory

04/ TRANSITION PLAN

- a. Responsibility
- b. Policies, Practices and Procedures Updates
- c. Barrier Removal Prioritization
- d. Funding Opportunities
- e. Cost Estimates & Implementation Schedule
- f. Recommended ADA Policy & Compliance Procedures

05/ APPENDIX

- a. Definitions
- b. Grievance Procedure Form
- c. Notice of Public Hearing/Open House
- d. Inventory Reports
 - i. Intersection Index
 - ii. ULIP Runs
 - iii. Signals
 - iv. Island Curbcuts
 - v. Curb Ramps
 - vi. Benches
 - vii. Parking Spaces
- e. Compliance Reports
 - i. ULIP Runs - Sidewalks
 - ii. ULIP Runs - Crosswalks
 - iii. Signals
 - iv. Island Curbcuts
 - v. Curb Ramps
 - vi. Benches
 - vii. Parking Spaces
- f. Prioritized Implementation Schedule

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01/ INTRODUCTION



INTRODUCTION

The Americans with Disabilities Act (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.”

The ADA seeks to dispel assumptions about disabilities and to assure equality of opportunity. The ADA prohibits discrimination in access to jobs, public accommodations, government services, public transportation and telecommunications.

This ADA Self Evaluation and Transition Plan, specific to pedestrian access within the public rights of way, is being prepared in response to expectations set forth in Title II of the Americans with Disabilities Act (ADA). Access to civic life by people with disabilities is a fundamental goal of the Americans with Disabilities Act (ADA). To ensure that this goal is met, Title II of the ADA requires state and local governments to make

their programs and services accessible to persons with disabilities ([28 CFR 35.149-35.151](#)). This requirement extends not only to physical access at government facilities, programs, and events -- but also to pedestrian facilities in public rights-of-way.

The self-evaluation process creates the opportunity for public entities to identify barriers to accessibility and develop action plans to remove existing barriers and mitigate future barriers stated within the transition plan.

This process has assisted the City of Clayton, its City Board of Alderman and staff in identifying policy, practices and physical barriers to accessibility and in developing barrier removal solutions that will facilitate the opportunity of improved access to all individuals within the city's public rights-of-way.

This report describes the overall process and findings of a self-evaluation for programs, policies and practices in the Public Works Department and a comprehensive review of the city's public rights of way infrastructure for sidewalks and curb ramps. An overview of the requirements for developing a Transition Plan per federal regulations is provided.

Subsequent sections describe the self-evaluation process, reveal the findings, provide recommendations and identify plans to remove barriers over time.



LEGISLATIVE MANDATE


The development of a Transition Plan is a requirement of the federal regulations implementing the Rehabilitation Act of 1973,

which require that all organizations receiving federal funds make their programs available without discrimination toward people with disabilities.

The Act, which has become known as the “civil rights act” of persons with disabilities, states that:

“ No otherwise qualified handicapped individual in the United States shall, solely by reason of handicap, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. (Section 504) ”

Subsequent to the enactment of the Rehabilitation Act, Congress passed the Americans with Disabilities Act (ADA) on July 26, 1990. Title II of the ADA covers programs, activities, and services of public entities. The Department of Justice’s Title II regulation adopts the general prohibitions of discrimination established under Section 504 and incorporates specific prohibitions of discrimination for the ADA. Title II provides protections to individuals with disabilities that are at least equal to those provided by the nondiscrimination provisions of Title V of the Rehabilitation Act.

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. This report establishes an ADA Self Evaluation and Transition Plan, focused specifically upon pedestrian access and public rights of way. 

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02/ SELF-EVALUATION OF POLICIES, PRACTICES & PROCEDURES



Mr. Steve Meyer, P.E. served as the primary contact for the Americans with Disabilities Act self-evaluation report on the policies, practices, and procedures of the City of Clayton Public Works Department.

INTRODUCTION

1.0 AMERICANS WITH DISABILITIES ACT

The passage of the Americans with Disabilities Act (ADA) of 1990 produced a comprehensive package of civil rights protections for persons with disabilities. The key goals of the ADA are to ensure that all people with disabilities have equality of opportunity, economic self-sufficiency, full participation in American life, and independent living. To ensure that these goals are met, Title II of the ADA requires state and local governments to make their programs and services accessible to persons with disabilities. [28 CFR § 35.149]

The City of Clayton is classified as a “public entity” pursuant to Title II of the Americans with Disabilities Act (ADA). The City of Clayton Public Works Department (PW) is responsible for the operation and maintenance of approximately 99 lane miles and 34 centerline miles of public streets. Additionally, within the public right-of-way that the city maintains are 55 miles of sidewalk, 22 traffic signals along with other pedestrian facilities.

PW is also responsible for administering the ADA compliance program for accessible pedestrian facilities within the public right-of-way. Barriers that deny or limit access to these programs, services or activities may be structural or nonstructural. Nonstructural barriers are defined as policies, practices or procedures that

inadvertently limit, segregate or discriminate against individuals with disabilities.

Under the ADA, PW is required to “make reasonable modifications in policies, practices, or procedures when the modifications are necessary to avoid discrimination on the basis of disability.” PW is required to do so in every situation, unless it can demonstrate “that making the modifications would fundamentally alter the nature of the service, program, or activity.” [28 CFR § 35.130 (7)]

The “reasonable modification requirement” is perhaps the most important element of a programmatic access infrastructure. This is because the Reasonable Modification Policy is the policy that says every policy, every procedure, and every practice is modifiable. The policy states that’s if you are qualified to participate in this program or receive this service, whatever is reasonable will be done to ensure that you receive as effective a service as any other qualified individual. It is the requirement of the ADA that demands a combination of flexibility, patience and creativity, without which a program cannot be fully accessible.



Figure 1: City of Clayton Mayor Harold Sanger City receives the 2013 Accessible STL Shine the Light Award recognizing organizations and individuals whose actions and policies exemplify the goals of promoting a fully accessible community for people with disabilities (see [notice](#) and [video](#)).



As evidenced by this self-evaluation report, the City of Clayton actively strives to eliminate barriers that may prevent persons with disabilities from enjoying access to the transportation network and independent mobility. The City of Clayton recognizes that people with disabilities are better able to participate in the community if the public rights-of-way are accessible because it is easier for them to reach their desired destinations. (see *Figure 1*)

1.1 SCOPE OF WORK

This self-evaluation report of City of Clayton PW policies, practices, and procedures is based on guidance found in the US Department of Justice [Title II Technical Assistance Manual](#) (Sections 8100 and 8200). Given that this is a study of one department within the City of Clayton, only the elements pertaining to the programs, services, and activities of PW were considered.

On May 28, 2013 an Americans with Disabilities Act (ADA) Self Evaluation Survey was sent to City of Clayton staff to document PW's formal written policies and the actual operating practices of each program, service, or activity in relation to the general prohibitions against discrimination contained in Title II of the ADA. Survey questions addressed a broad range of issues (see Appendix ___). Responses provided the consultant team with insights into PW internal program operations.

This report contains findings based on a review of responses to the ADA Self Evaluation Survey and provides recommendations to ensure compliance with the ADA. To assist the City of Clayton in its movement toward an organizational culture of compliance, strategies implemented in jurisdictions elsewhere in the nation are

presented that could assist PW improve the accessibility of its programs, services, and facilities for people with disabilities. Not all the strategies identified in this report will be appropriate for the City of Clayton. Rather, these strategies are intended to initiate a discussion about how to enhance PW's policies, practices, and procedures to improve access, mobility, and quality of life for people with disabilities while simultaneously helping the Department meet the city's overall transportation goals.

2.0 GENERAL & ADMINISTRATIVE REQUIREMENTS

Title II of the Americans with Disabilities Act (ADA) identifies specific steps that state and local governments must follow to comply with the ADA. These include:

1. *Prepare a Self-Evaluation of programs, services and activities that may not be accessible to persons with disabilities;*
2. *Develop a Transition Plan to provide for the elimination of barriers for disabled persons to access these programs, services and activities;*
3. *Designate at least one employee as the ADA Coordinator to be responsible for the ADA compliance program;*
4. *Establish a Grievance Procedure to respond to complaints regarding accessibility;*
5. *Provide notice to the public of the City's obligations under Title II to prohibit discrimination on the basis of disability; and*

02/ SELF-EVALUATION OF POLICIES, PRACTICES & PROCEDURES

6. Provide an opportunity for interested persons, including individuals with disabilities, or organizations representing individuals with disabilities, to participate in the development of the Transition Plan by submitting comments and making specific recommendations.

In accordance with the requirements set forth by the ADA, this document represents the ADA self-evaluation report on the policies, practices, and procedures of the City of Clayton Public Works Department.

2.1 ADA COORDINATOR

As required by the ADA, public agencies with 50 or more employees must designate at least one responsible employee to coordinate ADA compliance and investigate complaints. The public entity must provide the ADA coordinator's name, office address, and telephone number to all interested individuals [28 CFR § 35.107(a)].

The City of Clayton has a designated ADA Coordinator and Inclusion Officer that provides

City Department ADA Liaison Directory

Home > Equal Opportunity Department > Services > Americans With Disabilities Act (ADA) Compliance > ADA Liaisons

The city of Phoenix has a network of ADA liaisons to serve you. For disability concerns and specific questions on disability access regarding city activities, events, services or facilities, contact the following liaisons. If you have ADA questions that have citywide implications, contact the Equal Opportunity Department at 602-262-7466, fax 602-495-0517 or TTY 602-534-1557.

All phone numbers have a 602 area code.

Department	Liaison	Phone Number
Aviation	Richard Russell	273-3454
Budget & Research	Genevieve Sirl	495-7320
City Auditor	Diana Storino	534-0971
City Clerk	Yung Pham	262-4482
City Council	Debbie Grant	262-7593
City Manager	Corey Williams	261-8875
Community & Economic Development	Isabel Washchuck	495-5640
Equal Opportunity	Ruby Dirks	256-4127
Finance	Becky Kivioja	534-0899
Fire	Jim Zwerg	534-9875
Housing	Nichole Ayoola	534-1065
Human Resources	Jenelle Hancock	261-8888
Human Services	Dale Whitson	262-4034
Information Technology	Juanita Carver	261-8097
Law	Erin Bobo	262-7720
Library	Sandra Baird	534-0001
Mayor's Office	Adora Lewis	534-1275

Figure 2: City of Phoenix, AZ [ADA Liaison Directory](#)



centralized oversight and coordination of ADA compliance efforts with City departments. The identity and contact information of the City's ADA Coordinator should continue to be provided to staff and incorporated into new employee orientation packets, placed in frequently used publications and included on the City of Clayton's website and in staff and public directories.

It is recommended that the City of Clayton consider designating at least one responsible employee from each Department to build a strong network for disability awareness and compliance. The benefits of having an ADA Liason from each Department are that: (i) It makes it easier for members of the public to identify someone to help them with questions and concerns about disability discrimination; (ii) it designates a subject matter expert so Department specific questions can be answered quickly and consistently; and (iii) it creates a team effort that can be instrumental in moving compliance plans forward. It would then be appropriate to publish the names and contact information of these Departmental representatives on the City of Clayton homepage. (see *Figure 2*)

The person appointed to the Public Works ADA Liason position should be familiar with the Department's operation, trained in the requirements of the ADA, and able to deal effectively with advocacy groups, and the public. The PW ADA Liason should bring all department programs, policies/procedures, maintenance practices, and infrastructure into compliance with ADA Standards. The individual should also develop and oversee ongoing public outreach programs with the goal to disseminate information about the Department's efforts to eliminate barriers and make the City's pedestrian rights-of-way accessible by persons with disabilities. Finally, the PW ADA Liason

is responsible for ensuring that staff members receive annual training on their responsibilities under the ADA.

2.2 GRIEVANCE PROCEDURE

The City of Clayton is required to adopt and publish procedures for resolving grievances arising under Title II of the ADA [[28 CFR § 35.107 \(b\)](#)]. This requirement provides for a timely resolution of all problems or conflicts related to ADA compliance before they escalate to litigation and/or the federal complaint process.

Neither Title II nor its implementing regulations describe what ADA grievance procedures must include. However, the Department of Justice has developed a [model grievance procedure](#) that includes: (i) a description of how and where a complaint under Title II may be filed with the government entity; (ii) if a written complaint is required, a statement notifying potential complainants that alternative means of filing will be available to people with disabilities who require such an alternative; (iii) a description of the time frames and processes to be followed by the complainant and the government entity; (iv) information on how to appeal an adverse decision; and, (v) a statement of how long complaint files will be retained.

Once the City of Clayton updates its grievance procedure under the ADA, it should be distributed to all Department heads (see Appendix "A" for the updated ADA Grievance Procedure Form). Information regarding complaint procedures should be readily available to members of the public in addition to employees. Copies should be posted in public spaces of City buildings and on the City's website (see *Figure 3*)

02/ SELF-EVALUATION OF POLICIES, PRACTICES & PROCEDURES



Figure 3: City of Columbia, Missouri [ADA Grievance Procedure and Form](#)

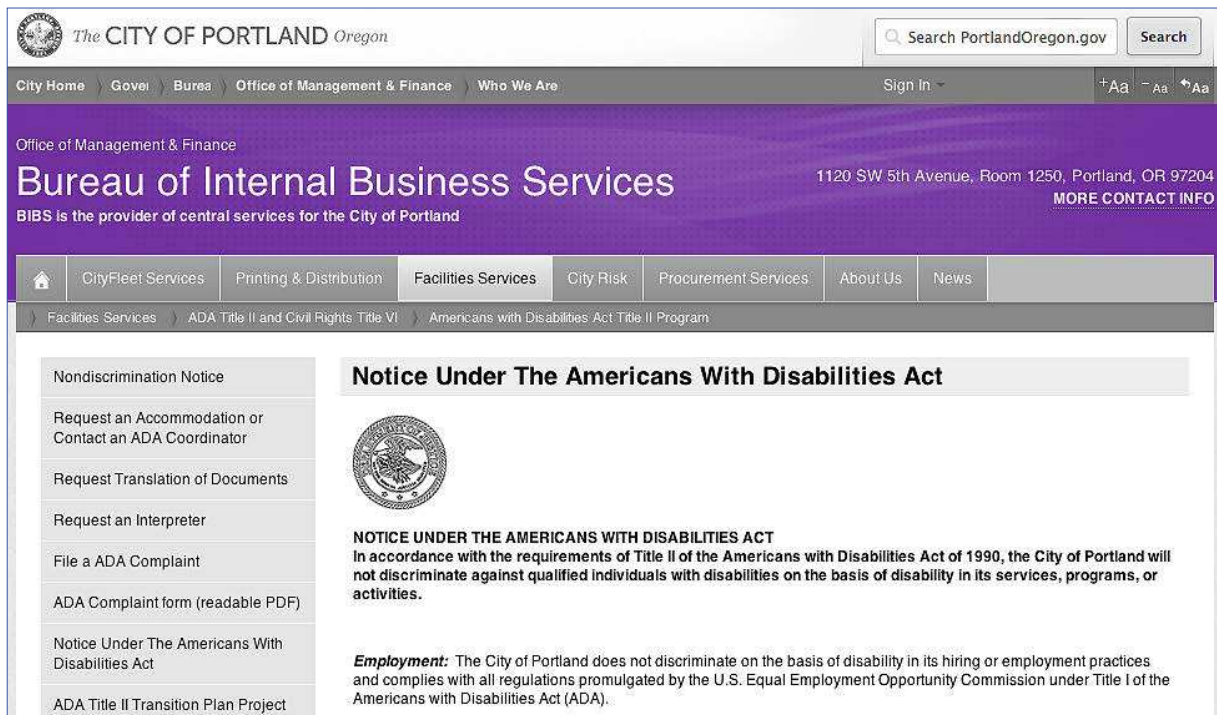


Figure 4: City of Portland (OR) [Notice of Under the Americans with Disabilities Act](#)



The City of Clayton might consider leveraging its centralized complaint handling system (known as ACR) to assist with the tracking of ADA complaint resolution. Centralized record keeping of such information will help the City and PW to regularly update its compliance efforts, and plan for additional compliance implementation for training and budget considerations.

Although individual departments within a municipal government are not required to develop and administer their own separate grievance procedure – distinct from the overarching citywide framework – the City of Clayton PW may elect to establish procedures to address complaints regarding the accessibility of pedestrian facilities in the public right-of-way (see City of Riverside, CA [ADA Complaint Resolution Procedure for Pedestrian Facilities in the Public Road Right-of-Way](#) and [ADA Complaint/Service Request Form](#)). Tracking resolution of these complaints/requests could assist PW in preparing an annual ADA compliance progress report (see Section 2.4 Plan Outreach).

It should be noted that if a complainant is dissatisfied with City's handling of the grievance at any stage of the process or does not wish to file a grievance by utilizing the City's ADA Grievance Procedure, the complainant may file a grievance directly with the [Missouri Commission on Human Rights](#) or the [United States Department of Justice](#). Use of the City's grievance procedure is not a prerequisite to the pursuit of other remedies.

2.3 NOTICE OF ADA COMPLIANCE

All public entities, regardless of size, must provide information about the rights and protections of Title II to applicants, participants, beneficiaries, employees, and other interested persons [[28 CFR § 35.106](#)]. The City of Clayton's "Disability Access and Nondiscrimination" notice is in keeping with the letter and spirit of the ADA legislation (see [Appendix __](#)). The activities of the City of Clayton's PW Department are covered under this notice. Consistent with best practices elsewhere (see [Figure 4](#)), the "Disability Access and Nondiscrimination" notice should be posted on the city webpage and at the City of Clayton front desk counter, located at the main entrance to City Hall, including PW.

A nondiscrimination notice, such as the following sample, should be utilized more broadly in other City of Clayton publications:

"The City of Clayton does not discriminate on the basis of disability in admission to, access to, or operations of its programs, services or activities. The City does not discriminate on the basis of disability in its hiring or employment practices. Questions, concerns, complaints or requests for additional information regarding the Americans with Disabilities Act may be forwarded to the City's ADA Coordinator (provide contact information)."

This statement should be incorporated into new employee orientation packets, and placed in frequently used publications and brochures describing City of Clayton programs, services, and activities.

2.4 PLAN OUTREACH

The ADA states that a public entity is required to enable interested persons to participate in the development of the transition plan by submitting comments and making specific recommendations. As part of the Self Evaluation process, the City of Clayton initiated an outreach program to draw out community concerns and thoughts on ADA accessibility issues in the public right-of-way. This process began with a notice on the Department website communicating the intent and current status of the initiative.

Public noticing was followed by an outreach effort that provided stakeholders from the disability community with improved access to

the decision-making process. Recognizing that Clayton has limited funds and cannot immediately make all sidewalks and curb ramp facilities fully accessible, PW solicited community input on where to prioritize its access modifications. Paraquad, a nonprofit organization whose mission is to empower people with disabilities to increase their independence through choice and opportunity, participated in this public consultation process that provided input to Clayton's ranking of sidewalk and curb ramp improvements.

After the ADA Transition Plan is adopted, a copy of this Plan should remain available for public reference through the Department website. As part of the project's overall public participation



Figure 5: It is suggested PW consider formalizing its procedures with a protocol similar to the one adopted in the [City of Chicago's ADA Sidewalk Ramp Program progress reports](#).



activities, it is recommended that PW maintain a continuing outreach component to inform the public of the progress made under the ADA Transition Plan. As part of the project's overall public participation activities, it is recommended that PW maintain a continuing outreach component to inform the public of the progress made under the ADA Transition Plan (see *Figure 5*).

The ADA compliance progress reports could identify information such as: the number of newly constructed curb ramps; number of modified curb ramps; other barrier removals and upgrades to accessibility; number of design exceptions filed that identify technical infeasibility; dollars spent by funding source for the accessibility program; updates on funding availability and the efforts taken by PW to secure extra funding; efforts toward community outreach; summary of requests/complaints received and how requests/complaints were resolved; evaluation of the targeted goals of the previous year; establishment of targets for the upcoming year; and other information as to the long term progress of the ADA program. Reports would be retained by the Department for at least three years and made available to the public in alternate formats upon request.

2.5 DEPARTMENT WEBSITE

As people turn to the internet as their primary source of information regarding services, programs, activities, and facilities, the City of Clayton's website assumes an increased importance as a communications tool. PW should strive to make its website as accessible as it can be for all visitors. Every effort should be made to encourage individuals to offer feedback and

suggestions to improve the website's architecture and organization to make it easier to navigate and more intuitive. An example of this approach is found in the City of Bloomington, IN [Website Accessibility Statement](#).

At present the City of Clayton PW website has limited ADA compliance information. PW should also work with the city-wide ADA Coordinator to document all of its ADA related policies and reports on one centralized webpage. At present the City of Clayton PW website has limited ADA compliance information. PW should also work with the city-wide ADA Coordinator to document all of its ADA related policies and reports on one centralized webpage. Documenting ADA compliance information represents a best practice (see *Figure 6*).

Utilizing the Department's web page can also provide a one-stop portal for issues related to the ADA, including pedestrian accessibility on Department rights-of-way, Transition Plan status and methodologies for filing complaints. PW should continue to welcome ongoing feedback from the public regarding the accessibility of its pedestrian facilities on its website. The website should be set up to receive requests from the public for sidewalk maintenance, curb ramps accessible pedestrian signals, and other accessibility-related improvements; the City of San Francisco's [ADA Complaint/Assistance Form](#) is a template to consider as a model.

Finally, PW should consider providing links to ADA laws and regulations and related national websites. Compiling this information allows for education of the general public and facilitates the exchange of information with the disabled community (see *Figure 7*).

02/ SELF-EVALUATION OF POLICIES, PRACTICES & PROCEDURES

The screenshot shows the homepage of the Office of ADA Compliance and Accessibility for the City of San Diego. The header features the city skyline and the text "Office of ADA Compliance and Accessibility". Below the header is a navigation menu with links: "OFFICE OF ADA COMPLIANCE AND ACCESSIBILITY HOME", "ABOUT THE DEPARTMENT", "AMERICANS WITH DISABILITIES ACT (ADA)", "CITY DISABILITY PROGRAMS", "POLICIES AND REGULATIONS" (highlighted), "RELATED LINKS", and "MAKE A COMPLAINT". A breadcrumb trail reads "Office of ADA Compliance and Accessibility Home > Policies and Regulations". The main content area is titled "Policies and Regulations" and includes a sub-section "Council Policies" with a list of 10 policy numbers and their descriptions, such as "Policy No. 000-03 - People with Disabilities (PDF) - Accessible Programs, Services, Activities and Facilities and Employment". A small image of a "PARKING ONLY" sign with a wheelchair icon is visible on the right side of the list.

Figure 6: City of San Diego (CA) ADA Policies and Regulations website.

The screenshot shows the "Resources" page of the Office on the Disabled at the City of St. Louis, Missouri. The header includes the city logo and a search bar. Below the header is a navigation menu with links: "Services", "Government", "Business", "Live & Work", "Visit & Play", "News & Media", and "Investor Relations". A row of colorful icons represents various accessibility services: a telephone, a wheelchair, a person with a cane, "CC" (Creative Commons), "Braille", a person with a head, a telephone with a signal icon, "Large Print", a person with a hand, a telephone, and a wheelchair. Below the icons is the text "Office on the Disabled by Kim Kreitner". The main content area is titled "Resources" and includes the text "Helpful St. Louis resources for the community regarding disabilities." Below this text are social media icons for Facebook, Twitter, and Google+, and a "Select Language" dropdown menu. The section "Helpful Community Links" includes a link to "City of Saint Louis Department of Personnel Administrative Regulation No. 103 # []".

Figure 7: City of St. Louis, Missouri [Helpful Community Links](#)



3.0 PROGRAMS FOR PHYSICAL ACCESS BARRIERS

Where sidewalks and curb ramps are provided, they must be constructed to be accessible to all potential users, including those with disabilities. Accepted design standards to achieve the intended level of access for people with disabilities can be found in the following reference documents: [2010 Department of Justice ADA Standards for Accessible Design](#); [2004 ADA Accessibility Guidelines \(ADAAG\)](#); [2006 Department of Transportation ADA Standards for Transportation Facilities](#); [2009 Federal Manual on Uniform Traffic Control Devices](#); and, [2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right of Way \(PROWAG\)](#).

Due to the widespread acceptance of the Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way and their pending adoption in the future, it is appropriate that the City of Clayton PW has been referencing PROWAG for the last five years when considering new construction and alterations in the public right-of-way. Compliance with these guidelines may help limit facility items that could or would be added to the Transition Plan when these Guidelines, in their final form, are adopted by the Department of Justice into the ADA Regulations and Standards.

4.0 PRACTICES THAT LIMIT PARTICIPATION

Consistent with the assessment protocol set forth in [Title II Technical Assistants Manual](#) - II-8.2000, this self-evaluation reviews PW's policies and practices to determine whether any exclude or limit the participation of individuals with

disabilities in its programs, activities, or services. Such policies or practices must be modified, unless they are necessary for the operation or provision of the program, service, or activity. In relation to PW's practices in the public rights-of-way, there are almost always unique circumstances where complete compliance with all of the applicable Title II ADA Regulations and Standards may not be possible.

The 2010 ADA Title II Regulations, in [[28 CFR § 35.151\(q\)\(2\)](#)], define this circumstance as being "structural impracticability". The [Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way](#) published by the U.S. Access Board, defines this circumstance as being "existing physical restraint". The [2004 ADAAG](#), published by the U.S. Access Board, defines this circumstance as being "technically infeasible". All of these standards acknowledge, with very similar language, that if complete compliance with the ADA Regulations and Standards is determined to not be possible due to technical infeasibility the site condition(s) and reason(s) leading to this determination must be documented and receive approval before proceeding with the project.

Before reaching a conclusion about technical infeasibility, City of Clayton PW considers the extent to which physical or site constraints can be addressed by alternative designs. PW makes every effort to provide modifications that would improve the existing conditions to facilitate access to the maximum extent feasible. For example, if a curb ramp is required along a street with curb-adjacent sidewalk where the street grade is approximately 8%, then installing an 8.33% curb ramp would be impractical. In such a case, PW would still install a curb ramp, albeit steeper, because a steeper ramp would be preferred over no ramp at all. In these instances, PW makes notes on its plan documenting technical infeasibility.

02/ SELF-EVALUATION OF POLICIES, PRACTICES & PROCEDURES

The following are several approaches to formalizing current practices in the application of the technical infeasibility exception:

1. *Reference recurring conditions leading to technical infeasibility directly in PW's standard drawings. Consistent with the approach taken in the [Washington State Department of Transportation Standard Plans for sidewalks and curb ramps](#), the City of Clayton PW may want to amend the "general notes" in design drawing C-7 to include the following consideration: "The curb ramp maximum running slope shall not require the ramp length to exceed 15-feet to avoid chasing the slope indefinitely when connecting to steep grades. When applying the 15-foot maximum length, the running slope of the curb ramp shall be as flat as feasible."*
2. *Develop an ADA Statement of Technical Infeasibility Form similar to the ones produced by other state (e.g., Michigan Department of Transportation) and local governments (e.g., Metropolitan Government of Nashville and Davidson County) to document the reason full compliance is infeasible (see [Figure 8](#)). This approach is consistent with the following guidance in the Missouri Department of Transportation ADA Checklist: "All exceptions and technically infeasible locations should be discussed with the project manager and/or area engineer prior to acceptance of the work. All exceptions and technically infeasible locations will need to be thoroughly documented by the PW, and that documentation will be attached to this form and retained as part of the final acceptance records."*

Metropolitan Government of Nashville and Davidson County
"Statement of Technical Infeasibility"
Provisions of the Americans with Disability Act Accessibility Guidelines (ADAAG)

ADAAG contains a provision relating to "technical infeasibility", applicable only in alterations. This exception does not apply to new construction. The provision is as follows:

Technical Infeasibility means, with respect to an alteration of an existing building or a facility, that it has little likelihood of being accomplished because existing structural conditions would require removing or altering a load-bearing member which 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 which are in full and strict compliance with the minimum requirements for new construction and which are necessary to provide accessibility.

Exception: In alteration work, if compliance with the ADA is technically infeasible, the alteration shall provide accessibility to the maximum extent feasible. Any elements or features of the building or facility that are being altered and can be made accessible shall be made accessible within the scope of the alteration.

"TECHNICAL INFEASIBILITY" STATEMENT
Relating to a project under review

Project Name: _____
Project Number: _____

The following item in the planned alteration project is not in full compliance with the respective ADA guidelines as noted in the review by the ADA Compliance Division of the Metropolitan Government of Nashville and Davidson County.
As Determined by the Department overseeing the project and/or the project Architect or Engineer, this item does provide a level of accessibility to the maximum extent feasible in compliance with the above exception.

Reference to Document Review Dated: _____ Item Number: _____

Explanation of why item is "Technically Infeasible" (attach additional sheets as necessary)

Steps taken to ensure that the project was constructed to the maximum extent feasible?

I/We acknowledge that responsibility for determining "technical infeasibility" rests with the Department overseeing the project and/or the Architect or Engineer.

Department: _____ Name (print) and title: _____ Signature: _____ Date: _____
Architect / Engineer (print name): _____ License Number: _____ Signature: _____ Date: _____

ADA Compliance Division Adapted 05/18/04

Figure 8: Metropolitan Government of Nashville and Davidson County [Statement of Technical Infeasibility](#)

5.0 EFFECTIVE COMMUNICATION

People with disabilities won't participate in government-sponsored programs, services, or activities if they don't understand what is being communicated. According to the ADA: "...A public entity shall take appropriate steps to ensure that communications with applicants, participants, and members of the public with disabilities are as effective as communications with others." [28 CFR § 35.160(a)] This directive includes ensuring that written materials (publications) such as meeting notices, agendas



and public information documents incorporate the following sample wording:

“To accommodate persons with disabilities, this document is available in alternate formats upon request.”

At present public notices on the City of Clayton’s website are available in HTML format and also available in alternate formats when requested.

To ensure that communications with members of the public with disabilities are as effective as communications with others the City of Clayton PW offers auxiliary aids and services at no cost when requested in advance by qualified individuals with disabilities. Examples of auxiliary aids and services for individuals who are deaf or have difficulty hearing can include qualified sign-language and oral interpreters, headset amplifiers, listening devices, TTYs (teletypewriters or text telephones), note takers and written materials. For individuals who are blind or have low vision, examples can include large print materials, Braille materials, materials in electronic format on compact disc or email, audio recordings, screen reader software, qualified readers, description of visually presented materials and assistance filling out forms. For individuals with speech impairments, examples can include TTYs, speech synthesizers and communications boards. Periodically, the City of Clayton should review the [Chapter III: General Effective Communication Requirements Under Title II of the ADA](#) contained in the [ADA Tool Kit for State and Local Governments](#).

6.0 SERVICE/EQUIPMENT ACCOMMODATIONS

PW provides accommodation (auxiliary aides and services) to qualified persons with disabilities who need such support to equitably participate in the City’s programs, services and activities. PW ensures that it provides readers for individuals with visual impairments; interpreters or other alternative communication measures, as appropriate, for individuals with hearing impairments; and amanuenses for individuals with manual impairments. The City-wide ADA Coordinator is responsible for securing these services. Where equipment is used as part of a public entity’s program, activity, or service, an assessment should be made to ensure that the equipment is usable by individuals with disabilities, particularly individuals with hearing, visual, and manual impairments. It is suggested the City document its commitment to reasonable through the adoption of a Reasonable Accommodation Policy and posting of this statement and an accommodation request form to its website (see **Figure 9**).

The screenshot shows the 'ADA Accommodation Request or Complaint Form' on the City of Monterey website. The form is titled 'ADA Title II Program' and includes a 'Contact Us' sidebar with the name and title of John Kuehl, Chief of Inspection Services/Building Official, ADA Coordinator. The main form fields include: Name of person making the request, Date of request (with a calendar icon), Address, City, State, Zip, Telephone, Email, and a section for 'Persons needing accommodation if other' with fields for 'Telephone of other person' and 'Other contact information'. There are also checkboxes for 'Accommodation' and 'Barrier Removal', and a text field for 'Accommodation needed in location of barrier'.

Figure 9: City of Monterey, CA [ADA Accommodation Request Form](#).

7.0 EMERGENCY EVACUATION PROCEDURES

The City of Clayton must adopt emergency preparedness plans that establish procedures for evacuating persons with disabilities who may need special assistance in an emergency (see **Figure 10**). These plans should: (i) address what to do when an alarm is triggered; (ii) establish meeting places for assistance and evacuation chairs; and, (iii) provide direction on what to do if assistance is not available.

PW should: (i) join other City staff in the conduct of emergency evacuation procedures with periodic drills, both announced and unannounced;

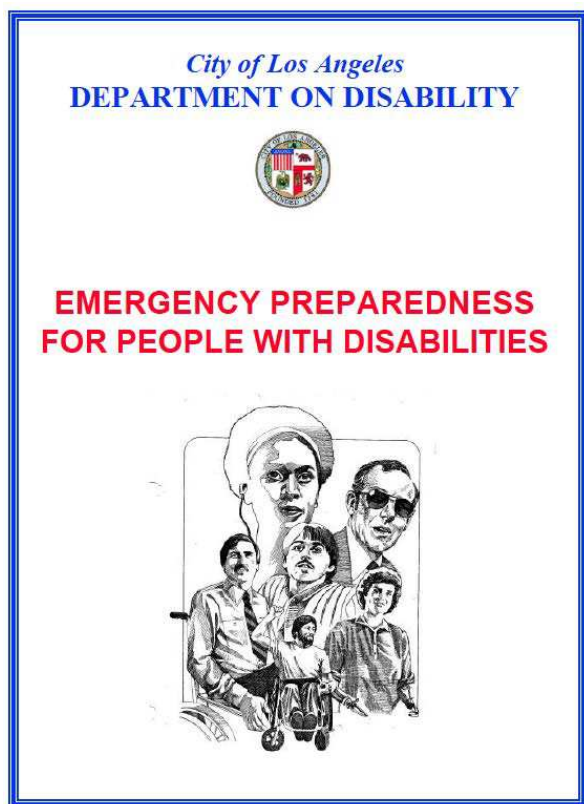


Figure 10: *City of Los Angeles [Manual on Emergency Preparedness for People with Disabilities](#)*

(ii) review existing procedures dealing with emergencies to ensure that persons with disabilities can be alerted and that they can alert emergency service providers; and, (iii) provide all evacuation policies and procedures in alternative formats when requested.

Specific guidance for complying with Title II of the ADA in the preparation of evacuation plans and procedures can be found in [Chapter VII: Emergency Management Under Title II of the ADA](#) contained in the [ADA Tool Kit for State and Local Governments](#). The following are additional resources on this topic: (i) the [Emergency Procedures for Employees with Disabilities in Office Occupancies](#) published by FEMA and the US Fire Administration; (ii) [Promising Practices for Evacuating People with Disabilities](#) produced by the Inclusion Research Institute; and, (iii) [ADA related links on the Federal Communication Commission website](#).

8.0 WRITTEN AND AUDIO VISUAL MATERIAL

The City of Clayton and all its Departments should review all audio visual material to ensure they are appropriate in content, as related to persons with disabilities to ensure demeaning stereotypes and outdated language are not contained in any publication. To be consistent with the U.S. Department of Justice's mandates within settlement agreements, the City of Clayton should develop or procure a training program or guide on disabilities and disability etiquette and distribute it to staff.

Training will ensure that staff is familiar with a variety of types of disabilities and that they are sensitive to the abilities and needs of people with



disabilities in order not to offend or demean them. The training should be periodically updated to ensure that it includes current acceptable language for talking about disabilities. The City should consult with interested persons, including individuals with disabilities, in developing or procuring the ADA training program (see *Figure 11*).

9.0 REGISTERED HISTORIC SITES

This section is found within the U.S. Department of Justice's Guidance on setting the scope for a Self Evaluation. Although the City of Clayton has a registered historic site – the Martin Franklin Hanley House – this self-evaluation report does not consider this site as PW does not have any program responsibilities of this facility.



Figure 11: In 2007, the City of Milton, GA established by resolution a [Disability Awareness Committee](#) to promote the inclusion of persons of all ability levels through education, advocacy, and influence on public policy. This Citizen Advisory Committee developed a [training program](#) on disability etiquette for City of Milton employees.

10.0 DETERMINATION OF UNDUE BURDEN

As required by [28 CFR § 35.130\(b\) \(7\)](#) the City of Clayton makes reasonable modifications in policies, practices, and procedures that deny equal access to individuals with disabilities unless a fundamental alteration in the program would result. As the entity responsible for authorizing the planning, design, construction, operation, and maintenance of public street rights-of-way and related activities, the City of Clayton PW is required to ensure that new pedestrian facilities be accessible to people with disabilities in accordance with the [Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way](#) (PROWAG).

PROWAG does not apply to existing pedestrian facilities unless the facilities are included within the scope of an alteration undertaken at the discretion of PW or other covered entities. PROWAG further defines alteration as “a change to a facility in the public right-of-way 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.” See [USDOJ-FHWA technical assistance dated 6-28-13](#) for additional clarification on alterations including items such as reconstruction, rehabilitation, widening, resurfacing, signal installation and upgrades, and projects of similar scale and effect.

The ADA permits agencies such as City of Clayton PW to defer upgrades of existing facilities to ADA standards if it can demonstrate “undue financial and administrative burden.” According to the [Title II Technical Assistance Manual Covering State and Local Government Programs and Services](#):

“A public entity does not have to take any action that it can demonstrate would result in a fundamental alteration in the nature of its program or activity or in undue financial and administrative burdens. This determination can only be made by the head of the public entity 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 in the program. If an action would result in such an alteration or such burdens, the public entity 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.”

It is incumbent upon the City of Clayton PW to have a system in place to equitably address accommodation requests from a qualified person with a disability and to appropriately determine when such a request would fundamentally alter the program and result in an undue burden [[28 CFR §35.150\(a\)\(3\)](#)]. The test for being unduly burdensome is the proportion of the cost for accessibility improvements compared to the agency’s overall budget, not simply the project cost. The decision that pedestrian access would be unduly burdensome must be made by the head of a public agency or that official’s designee, accompanied by a written statement of the reasons for the decision. If the conclusion is reached that any particular action would result in an undue burden, PW would need to take any other action that would not result in such burden but would nevertheless ensure that individuals with disabilities receive the benefits or services provided by the department.



11.0 ACCESS TO PUBLIC MEETINGS AND EVENTS

Title II entities must ensure that all public meetings and events sponsored are readily accessible to persons with disabilities. Consistent with this guidance, PW at the City of Clayton ensures that all of its public meetings, hearings, or comment periods are accessible. When hosting public meetings and hearings, the City of Clayton notifies all persons that these events will be held in accessible locations. An accessible location includes, but is not limited to, the following: wheelchair accessible path-of-travel to the meeting room, accessible restrooms, accessible parking, and an accessible route from transit and parking to the meeting facility.

All public notices should contain contact information for accommodation requests similar to:

“In compliance with the Americans with Disabilities Act, it is the policy of the City of Clayton to offer its public programs, services, and meetings in a manner that is readily accessible to everyone, including individuals with disabilities. If you are a person with a disability and require information or materials in an alternative format; or if you require any other accommodation, please contact [name] at [phone] or [email] at least five [5] days in advance of the event. Advance notification within this guidance will enable the City to make reasonable arrangements to ensure accessibility.”

A modification request may involve moving a disability-related agenda item at a public meeting to the beginning of agendas. Some people with disabilities are unable to stay late at meeting

because they have fixed schedules, as they need to use personal care attendants.

It is important to make information available to City staff on the types of modification requests that may be made by persons with different types of disabilities. Along these lines it is important to provide information to staff about auxiliary aids such as different types of assistive listening systems, sign language interpreters, readers, and other assistive technologies like real-time captioning. For example, interpreters are hired as requested for the hearing impaired and text materials that are accessible by screen readers are made available to users. Periodically, the City of Clayton should review the [Department of Justice Guide to Conducting Accessible Meetings](#) for additional information that may be helpful in planning an accessible public meeting and hearing.

Consistent with best practices, when private organizations sponsor special events on City property, the City of Clayton requires these entities complete a checklist that informs them of their responsibilities under the ADA. The City should periodically review its practices for allowing special events - including, but not limited to, indoor and outdoor concerts, plays, festivals, fairs, town hall meetings, luncheons, and ceremonies that are open to the public, whether held on city property or at other sites. Furthermore it is suggested that the following actions be taken:

- *In situations where private organizations sponsor events within public Right-of-Way, the City should require private organizations to comply with applicable ADA requirements.*
- *Event application requires a Layout Plan.*

02/ SELF-EVALUATION OF POLICIES, PRACTICES & PROCEDURES

Recommend the Layout Plan should include the location of all exposed wiring that crosses the pedestrian access route (P.A.R.). If wiring crosses the P.A.R., a ramping system must be provided. Ramp must be ADA compliant.

- *Recommend Layout Plan show pedestrian access route (P.A.R.) throughout the event site and indicating all accessible features including P.A.R., toilets, parking, ect.. Note location of Accessible Parking for Special Events should be located as close as possible to accessible entrance.*
- *Accessible parking for Special Events shall be compliant with Section 208 & 502, 2010 ADA and R214, R215, R309 & R310 of PROWAG. Accessible parking spaces shall be indicated on required Event Parking plan.*
- *Recommend providing ADA compliant portable toilets and portable sinks for Special Events in accordance with Section 203 & 604, 2010 ADA. Layout Plan shall indicate location of portable toilets and sinks and facilities shall be located on level sites with (2% slopes or less) with appropriate clear space.*
- *Recommend amending Note #3 of Para. "X" Event Parking to provide accessible aisle and clear floor space compliant with Section 503, 2010 ADA.*

Finally, it is important to note that the Missouri Human Rights Act makes it illegal for places of public accommodation to discriminate because of an individual's race, color, religion, national origin, ancestry, sex or disability. More information is available on the Missouri Commission on Human Rights (MCHR) [Discrimination in Place of Public Accommodation is Prohibited](#) flyer (the City of

Creve Coeur, MO has established a link to this flyer from its [accessibility webpage](#) to demonstrate its recognition of this guidance).

12.0 EMPLOYMENT

Title II of the Americans with Disabilities Act prohibits a public entity from discriminating against a qualified applicant or employee with a disability. It is unlawful for a public entity to discriminate in any aspect of employment including: application, testing, interviewing, hiring, evaluation, discipline, compensation, promotion, termination and benefits.

To ensure compliance with the provisions of Title II of the ADA, the City is required to conduct a review of its employment policies and practices, including the protocol for handling requests for reasonable accommodations and the essential job functions associated with each job category. As PW does not promulgate employment policy, employment was not within the scope of this review.

13.0 EXISTING FACILITY AND ALTERATION POLICIES

PROWAG ([R201.1 Scope](#)) states that: "all newly constructed facilities, altered portions of existing facilities, and elements added to existing facilities for pedestrian circulation and use located in the public right of-way shall comply with the requirements." Alterations include items such as reconstruction, rehabilitation, widening, resurfacing (see [USDOJ-FHWA technical assistance dated 6-28-13](#) for additional clarification), signal installation and upgrades, and projects of similar



scale and effect. Since 2009, all City of Clayton PW resurfacing projects have included the review and upgrades of curb ramps to PROWAG standards.

The scope of an alteration project is determined by the extent the alteration project directly changes or affects the public right-of-way within the project limits. The public agency must improve the accessibility of only that portion of the public right-of-way changed or affected by the alteration. If a project resurfaces the street, for accessibility purposes the curbs and pavement at the pedestrian crosswalk are in the scope of the project, but the sidewalks are not. Any of the features disturbed by the construction must be replaced so that they are accessible. All remaining access improvements within the public right-of-way shall occur within the schedule provided in the public agency's planning process.

Currently, the City of Clayton PW ensures the quality and consistency of pedestrian facilities in the public right-of way by requiring that all design and construction adhere to the City's Public Right-of-Way and Streetscape Standard Details. A review of PW's current design and construction policies for addressing new, altered, temporary, and permanent pedestrian facilities is provided in this section.

13.1 MAINTENANCE OF PEDESTRIAN FACILITIES

Section 3.2.4.3 of the [Access Board's Accessible Rights of Way: A Design Guide](#) states that:

“Public works departments should respond quickly to citizen reports of damaged surfaces along high-priority routes, so that pedestrians with mobility impairments do not have to seek alternate routes.”

The City of Clayton PW maintains its existing pedestrian facilities through an annual sidewalk replacement program. Areas of need are identified by field maintenance personnel and by requests from the public. It is the goal of the Department – through programs that address abrupt level changes in the sidewalk (such as lifting caused by tree roots) – to provide a timely response to the public's maintenance requests to assure accessibility for all persons.

The City of Clayton also operates a number of additional programs devoted to making sidewalks more accessible; including installation, repair, and maintenance programs a complaint/request process, and pedestrian related capital improvement projects.

1. *Community Development Block Grant Program: The City receives \$22,500 per year from HUD through St. Louis County. Program requirements stipulate that funding be expended to assist disadvantaged groups. The City is utilizing the funds to replace non-compliant ADA curb ramps in conjunction with upcoming street resurfacing projects.*
2. *Curb & Sidewalk Improvement Program: The average funding for this project is \$40,000 to \$50,000 per year. The project is mainly used to repair sidewalks, curb ramps and gutters throughout the City.*

02/ SELF-EVALUATION OF POLICIES, PRACTICES & PROCEDURES

3. *Street Overlay Program: The funding varies from year to year. Projects include repair, replacement and construction of new ADA compliant curb ramps and sidewalk.*
4. *Streetscape Improvement Program: Funding for this program varies from year to year. In addition to providing improvements and enhancements to the City's streetscape, the project also is used to improve accessibility along the pedestrian access route within the project corridor.*
5. *Street Tree Trimming Program: The Forestry Section of the Public Works Operations Division is responsible for the management of trees located in the public rights-of-way. Tree limbs that protrude into the Pedestrian Access Route are scheduled for removal or trimming.*

Finally, developers are required to install ADA compliant driveways, sidewalks, curb ramps through the submittal of a Right-of-Way Activity permit application and approval by the City.

13.2 PROTRUDING OBJECTS

PROWAG ([R210.2 Pedestrian Circulation Paths](#)) states: "objects along or overhanging any portion of a pedestrian circulation path shall comply with R402 and shall not reduce the clear width required for pedestrian access routes." In many instances City of Clayton residents and businesses are likely unaware that common items left on sidewalks and walkways can create unintended barriers. Natural obstacles include branches, shrubs or leaves; examples of manufactured objects are vehicles, street furniture, and temporary signs. Overgrown plants or debris can trip pedestrians, and low-

hanging branches can cause head injuries. Street furniture and temporary signs placed on sidewalks or walkways can limit accessibility.

Based on survey respondent feedback, it appears that PW's goals of maintaining the clear width required for Pedestrian Access Routes (PAR) is challenged by restaurants creating obstructions with outdoor dining areas. Field review of movable and fixed obstructions within the PAR identified numerous obstructions encountered due to outdoor dining facilities. The City of Clayton annual outdoor dining permit provides an opportunity for restaurants to install outdoor dining facilities within the public right-of-way. It is recommended that the City of Clayton require applicants to depict the City's 5 foot wide PAR in relation to outdoor dining facilities.

The City of Clayton should consider instituting a public information campaign aimed at explaining how residents and businesses are expected to eliminate sidewalk obstructions in front of their properties. Clayton's City Views Newsletter could be leveraged in this information campaign to impress upon the public that removal of obstructions is a process that relies on residents and businesses as much as City government.

13.3 SNOW REMOVAL

A public agency must maintain its walkways in an accessible condition with only isolated or temporary interruptions in accessibility [[28 CFR §35.133](#)]. This maintenance obligation includes reasonable snow removal efforts.

The City of Clayton requires property owners to clear the public sidewalks on or adjacent to their property within a reasonable time after snow or ice storms. The Planning & Development Services



Department recognizes that even though the City of Clayton has a sidewalk maintenance ordinance, that it needs to assume responsibility for communicating requirements, inspecting conditions, addressing complaints, and ultimately enforcing regulations. PW recognizes that while sidewalk maintenance may be required of property owners, it does not absolve the City of Clayton of the ADA requirement to provide accessible, well-maintained pedestrian facilities; as such, it often ends up clearing curb ramps once crews are done plowing the roads.

There are multiple citizen assistance program strategies to comply with ADA snow removal requirements (see [Winter Maintenance of Pedestrian Facilities in Delaware: A Guide for Local Governments](#)). By way of example, the City of Milwaukee (WI) Department of Public Works Sanitation Division has in place a winter snow removal and sidewalk clearing program for older citizens and disabled persons (see **Figure 12**). Alternatively, PW might consider implementing a volunteer-matching service similar to City of Chicago's [Snow Corps program](#) that enables seniors and residents with disabilities to request a volunteer to shovel their block in case of extreme snowfall.

13.4 ALTERNATIVE PEDESTRIAN ACCESS ROUTES

Title II of the ADA states that:

“A public entity shall maintain in operable working condition those features of facilities and equipment that are required to be readily accessible to and usable by persons with disabilities by the Act or this part. This section does not prohibit isolated or temporary interruptions in service or access due to maintenance or repairs.”

[\[28 C.F.R. § 35.133\]](#) Additionally, PROWAG ([R205](#)) states: “When a pedestrian circulation path is temporarily closed by construction, alterations, maintenance operations, or other conditions, an alternate pedestrian access route complying with sections 6D.01, 6D.02, and 6G.05 of the MUTCD (incorporated by reference, see R104.2) shall be provided. Where provided, pedestrian barricades and channelizing devices shall comply with sections 6F.63, 6F.68, and 6F.71 of the MUTCD (incorporated by reference, see R104.2).”

The City of Clayton PW abides by standards from the Manual of Uniform Traffic Control Devices to assure the safe passage of all persons through or around construction zones. By way of example, the Clayton Right-Of-Way Activity Information Sheet (Notes for Figure 6H-28—Typical Application 28) states: “When crosswalks or other pedestrian facilities are closed or relocated, temporary facilities shall be detectable and shall include accessibility features consistent with the features present in the existing pedestrian facility.”

The City of Clayton informs contractors performing construction adjacent to or within the public Right-of-Way that accessible routes must be maintained throughout the project. Compliance with these requirements is handled through the permit review process. The following recommendations are suggested relative to the Right-of-Way Information Sheet:

- Amend paragraph 10 to include a Sidewalk or Diversion Plan if P.A.R. is impacted and alters pedestrian access. All facilities installed, including those in the public right-of-way must accommodate pedestrians with disabilities. Sidewalks (P.A.R.) that are proposed to closed or diverted shall provide a plan that complies with 205 PROWAG and

02/ SELF-EVALUATION OF POLICIES, PRACTICES & PROCEDURES

The screenshot shows the City of Milwaukee Department of Public Works website. At the top left is the City of Milwaukee logo. The main header reads "DEPARTMENT OF PUBLIC WORKS" with the tagline "Enriching Lives" and "Milwaukee" in a script font. A search bar is on the right. Below the header is a navigation menu with links: "ABOUT DPW", "CONTACT DPW", "DPW DIVISIONS", "PARKING", and "DPW SERVICES". A row of images shows various DPW activities: a sanitation truck, a person working in a field, a yellow DPW truck, recycling bins, and a street with DPW equipment. Below the images are labels: "Sanitation", "Forestry", and "Fleet Services". The main content area is divided into two columns. The left column is titled "Sanitation Services" and contains a sub-section "Elderly & Disabled Assistance" with text about "Garbage & Recycling Carts, Senior Citizen and Disability Service" and "Winter Snow Removal, Winter sidewalk clearing for older citizens and disabled persons". The right column is titled "NEW Highlights" and contains a sub-section "NEW Construction Related Material Charge".

Sanitation Services

Elderly & Disabled Assistance

Garbage & Recycling Carts, Senior Citizen and Disability Service

If a senior citizen is not physically able to roll the garbage cart to the curb and back, and has no other able-bodied person in the household to do this, they will be given a Senior Citizen Hardship designation and a Sanitation employee will retrieve their garbage cart from its storage area, empty it and return it to the storage area.

If a person is not a senior citizen but is not physically able to roll the garbage cart to the curb and back, and has no other able-bodied person in the household to do this, they will be given a Disability Hardship designation. In some cases, doctor certification of disability may be required.

For information on these services, call (414) 286-CITY (2489)

Winter Snow Removal, Winter sidewalk clearing for older citizens and disabled persons

Residents living in single family homes who are physically unable to clear the sidewalk in front of their home may apply to the Sanitation Division for assistance with clearing the walk after a snowstorm. To be eligible, residents must certify that they and all other occupants of their home are senior citizens or handicapped and are physically unable to shovel the sidewalk. They must certify that they were unable to obtain the services of any other individual. The service is referred to as "hardship-exception case."

The Sanitation Division will send a plow to clear a path on the sidewalk in front of the residence only. The walk from the sidewalk to a door is not cleared. The service is provided only when plowing operations are called, and only the public sidewalk is cleared. Driveways and side walkways on private property are not cleared by Sanitation crews. The charges will be included in the property tax bill.

NEW Highlights

Extra Cart Fee. Beginning January 1, 2013 households with more than one garbage cart will incur a \$13 per quarter charge for each additional garbage cart.

To avoid this charge, contact the DPW Call Center at 286-CITY (2489) to request the City remove the extra garbage carts from your property. There is no extra charge for more than one recycling cart.

NEW Construction Related Material Charge. There is a charge for all City residents bringing construction related material into the self help stations. This includes roofing material, brick, stones, concrete, lumber, drywall, paneling and other construction material.

The charge is \$15 for up to 8 cubic yards, and \$30 for 8-16 cubic yards. (16 cubic yard maximum.) No contractor vehicles allowed.

Figure 12: Residents living in single-family homes who are physically unable to clear the sidewalk in front of their home may apply to the City of Milwaukee (WI) Sanitation Division for assistance with clearing the walk after a snowstorm. To be eligible, residents must certify that they and all other occupants of their home are senior citizens or handicapped and are physically unable to shovel the sidewalk. They must certify that they were unable to obtain the services of any other individual. The service is referred to as "hardship exception case."



Sections 6D.01 and 6G.05 of M.U.T.C.D.. See Figure 6H-28.

- Recommend requiring applicants to provide an ADA Post Construction Inspection Report, similar to MODOT's Post Construction Checklist.

The City of Clayton provides advance warning of road closures for City directed projects through notification on the City webpage. Advance warning signs are posted at the area of undergoing alterations or repair. We recommend posting location and mapping of alternative routes when existing path of travel is affected by construction or repair.

13.5 CURB RAMPS AND DETECTABLE WARNING SURFACES

Consistent with PROWAG (R207.1), for all street projects that involve new construction or an alteration such as repaving or reconstruction, the City of Clayton PW requires that new or existing pedestrian facilities and access routes be made accessible through the construction of curb ramps where curbs exist. To formalize these practices, the City of Clayton may consider adopting a comprehensive policy that outlines its curb ramp requirements including that portion related to the detectable warning surface (see City of Cincinnati, OH [example](#)).

Consistent with PROWAG (R208.1), the City of Clayton PW requires that all curb ramps, blended transitions, and pedestrian refuge islands include the provision of detectable warning surfaces. As resurfacing and streetscape projects occur in downtown Clayton and on Wydown, the City of

Clayton PW installs concrete paver crosswalks, which provide tactile guidance. Since there is no description in accessibility guidelines recommending material type or identifying durability requirements for detectable warning systems, PW has demonstrated initiative in testing and implementing a new product called Vanguard Detectable Warning, which allows it to better meet the PROWAG requirements, and other municipalities are following the City of Clayton's lead.

13.6 ACCESSIBLE PARKING

The City of Clayton provides, maintains and or leases seven municipal parking facilities, with five parking facilities located in downtown Clayton and two parking facilities in the Wydown Business District. The majority of these facilities provide designated parking spaces for individuals with disabilities. [2010 ADA Standards for Accessible Design](#) requires that a minimum number of accessible parking spaces be provided for each parking facility. Section 208.2 requires that each parking facility provide the number of accessible spaces per Table 208.2 Parking Spaces. The location of accessible spaces should meet the requirements of Section 208.3 and placed in locations that provide the shortest accessible route. The City should consider updating current City Ordinances that outline the requirement for accessible parking spaces within a City parking facility.

PROWAG (R214) requires the provision of accessible on-street parking spaces "where on-street parking is provided on the block perimeter and the parking is marked or metered" and "where parking pay stations are provided and the parking is not marked" to comply with R309.

02/ SELF-EVALUATION OF POLICIES, PRACTICES & PROCEDURES

The City of Clayton PW has made progress in complying with this requirement (e.g., a 2010 on-street accessible parking feasibility study and construction projects completed that include ADA compliant on-street parking). To build on this foundation of improving access for drivers with disabilities, it is recommended that PW develop and adopt: (1) standards for providing accessible on-street parking where on-street parking is provided; and, (2) a policy and procedure to

evaluate individual citizen requests for on street accessible parking spaces in residential areas.

PW should also consider reviewing the strategies of other communities to enhance its own policies and practices for managing accessible parking (see [Accessible Parking Policies and Practices in Other Jurisdictions](#)). The following is a sampling of best practices posted on the webpages of other jurisdictions: accessible parking requirements (see



Figure 13: : City of Tampa, FL [map](#) of disabled on-street parking locations



City of San Diego, CA [example](#)); discretionary program under which on-street disabled parking zones may be installed upon request by qualified individuals (see Saint Paul, MN [example](#)); progress report (see City of Encinitas, CA [example](#)); and, map of disabled on-street parking locations (see [Figure 13](#))

13.7 ACCESSIBLE PEDESTRIAN SIGNALS

According to PROWAG ([R209.1 Accessible Pedestrian Signals and Pedestrian Pushbuttons](#)): “Where pedestrian signals are provided at pedestrian street crossings, they shall include accessible pedestrian signals and pedestrian pushbuttons complying with sections 4E.08 through 4E.13 of the MUTCD (incorporated by reference, see R104.2). Operable parts shall comply with R403.”

The City of Clayton has 22 signalized intersections that are being evaluated as part of the PROWAG self-evaluation process. The self-evaluation is evaluating whether pedestrian signals comply with minimum requirements for button height, design and placement. Future installations and/or alterations will require compliance to the PROWAG requirements. As new technologies develop, PW should also evaluate these technologies in concert with the local community of persons with disabilities.

13.8 CONTRACTING

The City currently uses criteria that does not discriminate based on disability when selecting contractors, consultants or vendors for City projects or services. However, federal regulations also require that any outside contractors receiving City funding, or receiving federal funding through the City, comply with the requirements and regulations of Title II of the ADA. When preparing contracts for services by architects, engineers, and contractors involved in building and altering roads, sidewalks, other walkways, and curb ramps, PW should consider:

- *Including a statement in all Request for Proposals, contracts or other bid solicitation documents or Web pages explaining that businesses, organizations or individuals contracting with the City of Clayton must comply with Title II of the ADA.*
- *Requiring all City contractors, consultants or vendors sign a statement attesting to their intent to comply with Title II of the ADA. This statement can be added to existing contract documents or can be a separate form.*

PW should also consider requiring that the architects, engineers, and contractors who work for them to become certified in the PROWAG through ADA training (see [Figure __](#)). By way of example, the City of Columbus (OH) offers five ADA ramp training sessions annually. The free classes are open to City staff, contractors, inspectors, designers, and consultants. The classes are mandatory for all contractors and inspectors involved in the curb ramp program who have not attended a previous class (see [Figure 14](#)).

14.0 STAFF TRAINING

A key deficiency revealed by the self-evaluation survey conducted in May 2013 was the need for regular and recurring employee training regarding a variety of subjects related to the requirements and regulations of the ADA. Providing dedicated, trained staff within the Department for ADA compliance has a high correlation with successful implementation of the Transition Plan and future updates. PW currently offers annual ADA training (seminars and classes) to its engineers and inspectors. As part of the adoption of its Transition Plan, the City of Clayton has the opportunity to consider a range of ADA training opportunities (see “Trainings, Courses, and Presentations on page 99 of the [Special Report on Accessible Public Rights-of-Way](#)).

In addition to technical ADA training arranged through PW for its engineers and inspectors, the City of Clayton may want to consider broadening ADA training opportunities to all employees, regardless of their position. For example, PW should consider providing “Disability Awareness” and sensitivity training opportunities on the appropriate ways of

communicating with and providing modifications for persons with disabilities (see Paraquad’s “[Words with Dignity](#)” flyer). This form of training would be relevant to all City employees who have contact with the public (see City of St. Louis website, [Communicating with People with Disabilities](#)).

Jurisdictions will frequently demonstrate their staff’s commitment to disability etiquette by posting this information on their website (see the City of Long Beach website, [Interacting with People with Disabilities](#)). Educating Department staff in the requirements of Title II of the ADA results in better flow of information regarding non-compliant rights-of-way and can create a “buy-in” to the process by all staff.

In addition to providing this information to all existing employees and new hires, PW should provide all employees with annual reminders about the ADA requirements by providing links to instructional information. Any changes to the law affecting the Department should also be monitored and shared with employees as appropriate. This continuing education effort should occur in coordination with the annual updates that will be made to the ADA Transition Plan. ♿

SP-13 ADA WHEELCHAIR RAMP TRAINING REQUIREMENT

Any contractor or subcontractor involved in layout, design or construction of ADA wheelchair ramps shall have previously attended a City sponsored training session. This shall include anyone responsible for planning, directing, and constructing wheelchair ramps in the City of Columbus, i.e. project superintendent, supervisor, and/or foreman. If a new superintendent or foreman is hired, they must attend a training session before they will be permitted to execute work on this project. Laborers are not required to attend.

For more information, contact the City’s ADA Section at 645-RAMP (7267)

Figure 14: City of Columbus (OH) standard contract language with construction firms working in the PROW.



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03/
SELF-EVALUATION
OF INFRASTRUCTURE
Sidewalks,
Curb Ramps &
Signals



The following section discusses how the sidewalk and curb ramp data was collected as well as the process of analysis for barrier ranking, to ensure effective prioritization for future barrier removal planning.

► PROJECT SCOPE & PURPOSE

The ADA requires every state and local government to prepare a self-evaluation plan to identify program access issues. The City of Clayton undertook an ADA sidewalk, signal, and curb ramp self-evaluation update to assess its program accessibility responsibilities for existing pedestrian facilities in the public rights-of-way.

This report is a comprehensive analysis of the city's existing sidewalk and curb ramp facilities. Data collected from this assessment enables city staff to: 1) determine if a sidewalk, signal, curb ramp, accessible parking or street furniture meets intended design specifications and guidelines; 2) document feature and maintenance information; 3) identify portions of sidewalks, signals or pedestrian access areas requiring modifications, 4) quantify the extent of the work required; and, 5) include all data in the City's Geographic Information Systems (GIS) database. The barrier ranking analysis used in this process took into account usage, severity, proximity to key facilities and involved a public consultation process, which the City believes responds to the needs of people with disabilities in the community.

City of Clayton's ADA Transition Plan references the barrier rankings of non-standard pedestrian facilities documented in the self-evaluation inventory report to identify corrective measures in the city's public rights-of-way. Recognizing that the City has limited funds and cannot immediately make all sidewalks and curb ramp facilities fully accessible, the City's ADA Transition Plan sets forth the schedule for making access modifications. The City of Clayton reserves the right to update the barrier removal priorities to allow flexibility in accommodating changes in programs, community requests, and petitions for reasonable modifications from persons with disabilities.

► PUBLIC RIGHT-OF-WAY FACILITIES

The project team worked together to develop an initial list of infrastructure study areas that would provide a representative cross section of the City. The general categories included signalized intersections, un-signalized intersections, sidewalk corridors, parking lots, accessible on-street parking, accessible parking pay stations, and street furniture. The area locations were selected based on their current use, location, services provided, ridership, and several other factors. The following sections detail these initial study areas. Self-evaluations were completed for the initial study areas. The purpose of these evaluations was to determine the existing conditions of the facilities and if they are in compliance with the ADA and to identify solutions to remove any barriers. The following sections detail the initial study area locations, the areas within each location that were evaluated, and a summary of general issues that were found. Self-evaluation reports for each facility can be found in Appendix_____.



Signalized Intersections

A total of 22 signalized intersections were evaluated during this project. This accounted for all of the existing signals in the City. These signals were located along arterials throughout the City and within the downtown area. Areas that were evaluated for each signal included running and cross slopes of curb ramps, access to the pedestrian push buttons, diameter of push buttons, mounting height of push buttons, presence and condition of crosswalk markings, and clear floor space in front of the push buttons. The self-evaluation reports for these signals can be found in Appendix “E “. There were several common issues observed at these signals. They included:

- **Non-compliant curb ramps:** *ramps had noncompliant running, side, and cross slopes, noncompliant landings, or no landings.*
- **Dangerous transitions:** *transitions from the base of the ramp to the roadway exceeded ¼” at numerous locations.*
- **Pedestrian push buttons:** *there was no accessible path to the buttons, there was no clear floor space provided and buttons were mounted too high.*

Un-Signalized Intersections (Curb Ramps & Island Curb Ramps)

A total of 272 un-signalized intersections (including ADA complaint locations) were evaluated during this project. These intersections accounted for 793 curb ramp locations. The curb ramps were located throughout the City residential areas and within the downtown area. Curb Ramps were evaluated for running and cross slopes, landings or no landings, side flares, detectable warnings or no detectable warnings gutter slopes, and gutter lips that would present trip hazards. The self-evaluation reports for these curb ramps can be found in Appendix “ “. There were several common issues observed at these

intersections. They included:

- **Non-compliant curb ramps:** *ramps had noncompliant running, side, and cross slopes, noncompliant landings, or no landings.*
- **Detectable Warning Surfaces:** *there was no detectable warning surface present or if present was offset to far from the curb.*

Sidewalk Corridors

The self-evaluation for the arterial sidewalk corridors included assessments of the sidewalk and marked crosswalks. A total of 54.6 miles of sidewalk were evaluated. This accounted for all of the sidewalks in the City. Areas that were evaluated along each sidewalk corridor included sidewalk running and cross slopes, driveway locations, obstructions, sidewalk width, and heaving and cracking.

There were several common issues observed along the corridors. They included:

- **Non-compliant sidewalks:** *sidewalks that had noncompliant running and cross slopes.*
- **Heaving and cracking:** *heaving adjacent to trees and sidewalk sections that were cracking.*

Parking Lots & On-Street Parking

A total of seven (7) City parking lots were evaluated as part of this project. In addition, accessible on-street parking was assessed.

There were several common issues observed at these Parking lot locations. They included:

- **Accessible parking:** *accessible parking was either not provided, or if it was, was often non-compliant.*

▶ **RIGHT-OF-WAY INFORMATION SHEET**

The City of Clayton provides an opportunity for private organizations to install new facilities within public Right-of-Way. The City of Clayton informs private organizations performing construction adjacent to or within the public Right-of-Way that accessible routes must be maintained throughout the project. Compliance with these requirements is handled through the permit review process.

Recommended Actions:

- *Amend paragraph 10 to include a Sidewalk or Diversion Plan if P.A.R. is impacted and alters pedestrian access. All facilities installed, including those in the public right-of-way must accommodate pedestrians with disabilities. Sidewalks (P.A.R.) that are proposed to closed or diverted shall provide a plan that complies with 205 PROWAG and Sections 6D.01 and 6G.05 of M.U.T.C.D.. (See Figure 6H-28 of M.U.T.C.D.)*
- *Recommend requiring applicants to provide an ADA Post Construction Inspection Report, similar to MODOT's Post Construction Checklist.*

The City of Clayton provides advance warning of road closures for City directed projects through notification on the City webpage. Advance warning signs are posted at the area of undergoing alterations or repair.

Recommend posting location and mapping of alternative routes when existing path of travel is affected by construction or repair.

▶ **ANNUAL OUTDOOR DINING PERMIT**

The City of Clayton provides an opportunity for restaurants to install outdoor dining facilities within the public right-of-way. Field review of movable and fixed obstructions within the P.A.R. identified numerous obstruction encountered due to outdoor dining facilities.

Recommended Actions:

- *Requiring applicants to provide the City's 5 foot wide Pedestrian Access Route in relation to outdoor dining facilities.*

APPROACH TO INVENTORY COLLECTION & ANALYSIS

▶ **DATA COLLECTION**

The traditional ADA inventory process in the public rights-of-way can be labor intensive while still offering inexact information. Many public entities rely on collection methods that provide limited information or assess barriers intermittently. This does not offer a precise data or allow for accurate cost estimates for barrier removal. The City of Clayton indicated an interest in utilizing a new technology that would quickly and accurately document the type, severity, and location of sidewalk and ramp barriers in the City. A new technology was identified that would allow for a more efficient and effective process. In 2013, the City of Clayton engaged Cole & Associates, Inc. utilizing an exclusive technology



called the ULIP-ADA, to complete the city's self-evaluation process for infrastructure within the public rights of way.

The technology was originally developed through a pilot program funded by the Federal Highway Administration. The Ultra-Light Inertial Profiler (ULIP) is mounted on a Segway. The device's displacement laser, three accelerometers, optical trigger, distance measurement instrument, and gyroscope are designed to measure the sidewalk surface at a rate of 10,000 records per second. Together, these devices capture highly accurate information about cross and running slope and small surface variations that can make a sidewalk difficult to navigate. A mounted computer, or Toughbook tablet, offers an interactive display during data collection. The technical precision offered by this technology was identified as a best practice in *ADA Compliance at Transportation Agencies: A Review of Practices* (NCHRP 20-07 Task 249), a National Cooperative Highway Research Program study.

Cole utilized the ULIP-ADA synched with custom built software tools for precise and efficient data collection. The method can measure approximately six times more sidewalk per day versus traditional methods. With a smart level, the slope is only measured where the instrument is laid; however, while driving the ULIP-mounted Segway, the slope is measured constantly. Field Specialists also collected the required information for the curb ramps and pedestrian signal actuators throughout the project area. A data collection checklist based on the 2010 ADA Standards & Regulations requirements and PROWAG recommendations were pre-programmed into handheld data collectors. Using traditional measuring and smart-level equipment, the Field Specialists entered data directly into the data collectors.



Data collection, data validation, and linking to location and digital photo files happened automatically as the Field Data Specialists entered data and moved from point to point. The Field Data Specialists accessed both the data entry and validation forms and aerial orthophoto images along with right-of-way, utility, topographic, or other feature data sets that were preloaded and appeared on the data collectors for easy reference in the field. Digital photos were automatically logged for location and linked to the database, based on synchronized time and date stamps.

The Team's measuring procedures and technologies, based on disability access code requirements, afforded for both rapid and accurate assessment of access barriers. The process included checklists integrated into the field data collectors for both the sidewalk measurements and the curb ramps, ensuring that all relevant features or associated dimensional characteristics were recorded, photos and video were properly linked to features, and accurate location data was logged into the database.

Quality control was an important aspect of field data collection. The data entry forms prompted the user for the required information, thus reducing the incidence of missing or inaccurate data. The input was based on a standardized format, which reduced subjective interpretation. Mobile GIS removed the error-prone conversion of spatial data from paper maps to digital format by synchronizing digital files directly between a handheld device and the desktop GIS. A custom routine was run on the collected data regularly to check for errors or missing information.

Data was synced directly to a GIS database thus reducing the risk of errors in data conversion. The process involved highly effective data syncing and analysis through Cole's customized

software - increasing accuracy and improving project prioritization. This ultimately created a streamlined approach to understanding and evaluating barriers and the cost estimations for barrier removal to allow for effective planning for pedestrian access within the city's public rights of way.

▶ DATABASE ANALYSIS

The City of Clayton's ADA sidewalk and curb ramp data provides staff with geographic data with **1) positional accuracy**, the digital representation of a barrier conforms to the actual location found in the field; and, **2) attribute accuracy**, the digital representation of a barrier is represented in a manner that best represents actual conditions found in the field (% running slope, % cross-slope, inches of vertical separation, etc.).

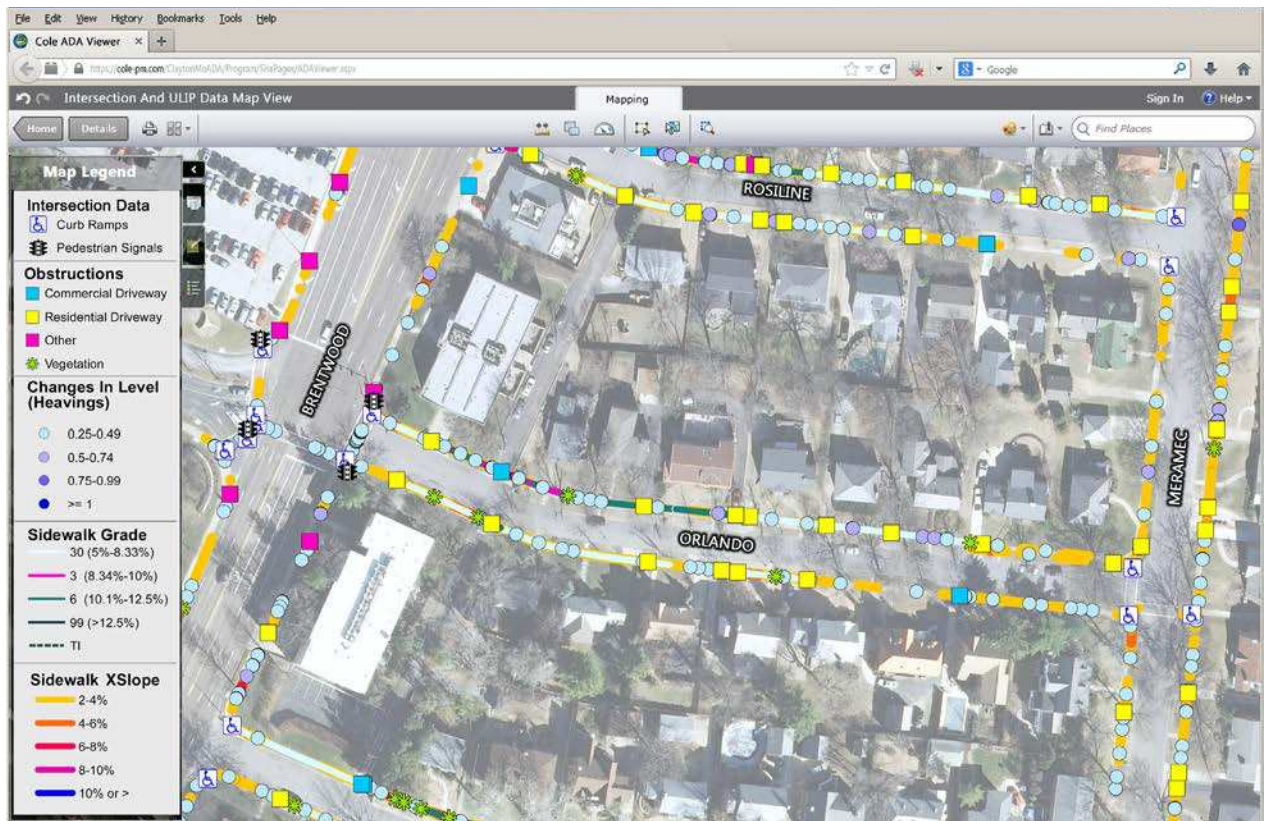
Guidance in defining the window size over which to assess the data was found in *Designing Sidewalks and Trails for Access (FHWA, 1999)*. This report advises that grade and cross-slope "should be measured over 2 ft intervals, the approximate length of a wheelchair wheelbase, or a single walking pace." Adherence to Federal Highway Administration interpretation of features in the data set provided quality assurance in the attribute accuracy of the resulting database.

Once the field data collection and validity checks were performed, the raw data was processed so it could be stored in the City's centralized GIS database for analysis and reporting. GIS played a pivotal role in the project from data acquisition (organizing the millions of data points generated during the study) to creating an ArcPad user



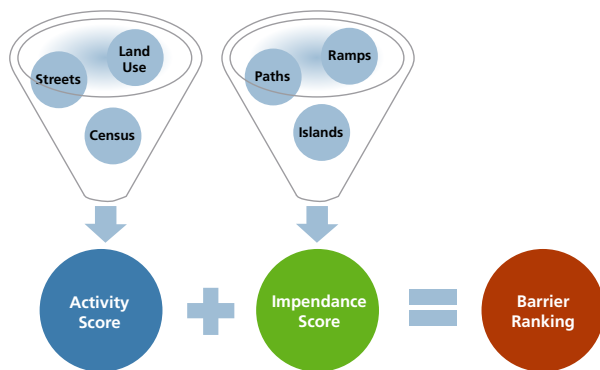
interface for asset management and compliance monitoring. Additional available data point attributes can be used for compliance tracking. Compliance reporting capabilities have been

deployed to track progress. The resulting ADA sidewalk and curb ramp self-evaluation report is the documented result.



BARRIER RANKING

The GIS-based barrier ranking analysis results in a combined activity and impedance score for every sidewalk and curb ramp. A high activity score is representative of areas where pedestrian activity (especially among persons with disabilities) is likely to be greatest, based on demographic, land use, and transportation conditions. A high impedance score is representative of areas where the quality of existing pedestrian infrastructure is poor for persons with disabilities, based on barriers documented in the sidewalk and curb ramp inventory.



ACTIVITY SCORE

Activity factors that describe the likelihood of disability community usage of an area’s pedestrian facilities are based on the following ten activity score categories (summing to a possible 100 points).

- i. **Places of public accommodation.** *The ADA emphasizes the importance of “walkways serving local government offices and facilities” as such, these locations, along with community centers,*

social service providers, libraries, and hospitals are prioritized. This activity score category is determined by the proximity (expressed in linear feet) to these destinations.

Value	Weight	Calculation
20	0-500	100%
	501-1500	70%
	1501-2640	40%
	2640+	10%

- ii. **Transit.** *Dependable, accessible public transportation is especially important for people with disabilities, many of whom rely on it to get to work and actively participate in their communities. This activity score category is determined by City of Clayton/Metro stop-level boarding activity data.*

Value	Weight	Calculation
20	0-500	100%
	501-1500	50%
	1501-2640	20%
	2640+	0%

- i. **Central Business District.** *Removing barriers to retail establishments facilitates equality of opportunity and full participation in civic life for people with disabilities. This activity score category is determined by the proximity (expressed in linear feet) to these destinations.*



Value	Weight	Calculation
15	within limits	100%
	outside limits	0%

iii. **Housing density.** Higher density communities with mixed land-use patterns tend to have higher levels of pedestrian activity. This activity score category is determined by Comprehensive Land Use Plan densities (expressed as units/acre).

Value	Weight	Calculation
15	R7&R6	100%
	R5&R4	70%
	R3	40%
	R2	10%
	R3	0%

iv. **Park Facilities-Recreation.** There are numerous parks in City of Clayton with a broad range of amenities and features, including pools, community centers, hikelbike trails, etc. The City is committed to providing access to its parks, recreational facilities, and programs, for people with disabilities. This activity score category is determined by the proximity (expressed in linear feet) to these destinations.

Value	Weight	Calculation
10	0-500	100%
	501-1500	70%
	1501-2640	40%
	2640+	0%

v. **Schools.** Parents often consider “good” schools as an important factor when buying a new home. How their children get to and from school is part of that equation. The City is committed to working with the Clayton School District through safety improvements to increase the number of children who walk to school. This activity score category is determined by the proximity (expressed in linear feet) to these destinations.

Value	Weight	Calculation
10	0-500	100%
	501-1500	70%
	1501-2640	40%
	2640+	0%

vi. **Retail.** Removing barriers to retail establishments facilitates equality of opportunity and full participation in civic life for people with disabilities. This activity score category is determined by the proximity (expressed in linear feet) to these destinations.

Value	Weight	Calculation
10	0-500	100%
	501-1500	70%
	1501-2640	40%
	2640+	0%

▶ IMPEDANCE SCORE

Activity scores are then combined with sidewalk and curb ramp impedance scores representing the areas of greatest constraint on mobility in the public rights-of-way. The impedance score calculations follow design guidance found in the ADA PROWAG Proposed Guidelines on dimensions and details for new construction and alterations of both sidewalks and curb ramps.

Sidewalk Impedance Score –

Focuses on sidewalk characteristics that directly affect the usability of a sidewalk and determines whether the facility’s features represent a low, medium, or high barrier to accessibility.

The score is based on the number and severity of incidents of each of the following barriers over a given block face: fixed obstructions, changes in level, cross-slope, and running slope. Scores are further adjusted by the ratio of non-standard features relative to the total length of the block face (a possible 100 points).

(i) **Fixed Obstructions.** *Obstructions and protrusions in the pedestrian environment are defined as objects that limit the vertical and horizontal passage space, protrude into the circulation route, or reduce the clearance width of the sidewalk. PROWAG R402.2 states that a*

minimum clear width of 48 inches be preserved in the sidewalk area. And, PROWAG R402.2 states that objects projecting from walls that have leading edges between 27” and 80” should not protrude more than 4” into walks and passageways. Freestanding objects mounted on posts or pylon may overhang a maximum of 12” from 27” to 80” above the ground.

Value	Weight	Calculation
100	25%	$\frac{((\# \text{ incidents} * \text{ Value}) / \text{ Total Block Length}) * \text{ Weight}}{\text{Weight}}$

(ii) **Changes in Level.** *Changes in level are defined as vertical height transitions between adjacent surfaces or along the surface of a path. Federal accessibility standards (PROWAG R302.7.2) permit changes in level less than 0.25” high to be vertical but require changes in level between 0.25” and 0.50” to have a maximum bevel of 50 percent. A ramp is required for changes in level that exceed 0.50”.*

Impedance Category	Value	Weight	Calculation
1/4”-1/2”	5	25%	$\frac{((\# \text{ incidents} * \text{ Value}) / \text{ Total Block Length}) * \text{ Weight}}{\text{Weight}}$
1/2”-3/4”	25		
3/4”-1”	80		
1”+	100		

(iii) **Cross Slope.** *Cross slope is defined as the slope measured perpendicular to the direction of travel. Changes in cross slope are commonly found at driveway crossings without level landings. Steep cross slopes can make it difficult*



for wheelchair or crutch users to maintain lateral balance and can cause walkers and wheelchairs to veer downhill or into the street. PROWAG R302.6 does not permit cross slopes to exceed 2%.

Impedence Category	Value	Weight	Calculation
2-4%	5	25%	(Linear Feet * Value) / Total Block Length * Weight)
4.1-6%	25		
6.1-8%	50		
8%+	100		

(iv) **Running Slope (Grade).** Grade is defined as the slope parallel to the direction of travel. Both powered and manual wheelchairs can become unstable and/or difficult to control on sloped surfaces. PROWAG R302.5 & R407.2 specifies that any sidewalk that is greater than 5 percent is considered a ramp. Allowances are made to permit the grade of the sidewalk to be consistent with the grade of adjacent roadways.

Impedence Category	Value	Weight	Calculation
5-8.33%	5	25%	(Linear Feet * Value) / Total Block Length * Weight)
8.34-10%	10		
10.1-12.5%	50		
12.6%+	100		

Signal Impedance Score –

Focuses on pedestrian street crossings with accessible traffic signals characteristics that directly affect the usability of pedestrian street crossing and determines whether the facility's features represent a low, medium, or high barrier to accessibility. The signal impedance score is determined by two levels of consideration locations where pedestrian signals are warranted but missing (priority 1); or, locations where pedestrian signals exist but have non-standard features (priority 2).

(i) **Button Height.** Button heights in the pedestrian environment provides for a mounting height of approximately 42 inches, but no more than 48 inches, above the sidewalk. PROWAG section R209 states that pushbuttons must comply with section 4E.08 of the Manual of Uniform Traffic Control Devices (MUTCD).

Impedence Category	Value	Weight
0"-42"	50	10%
42"-48"	0	
48"+	50	

(ii) **Button Diameter.** Button diameter in the pedestrian environment provides for a minimum diameter of 2 inches. PROWAG section R403.4 requires operable parts be able to operate with one hand and shall not require a tight grasping.

Impedence Category	Value	Weight
0"-2"	100	10%
2"+	0	

(iii) **Button Pressure.** *Button pressure in the pedestrian environment provides for a maximum operable force. PROWAG section 403.4 requires operable parts be able to operate with one hand with a force that does not exceed 5 lbs.*

Impedence Category	Value	Weight
0-5lbs	0	10%
+ 5lbs	100	

(iv) **Button Contrast.** *Button contrast in the pedestrian environment provides for a visual contrasting button compared to the button housing mechanism. Visual contrast and a locator tone enable blind or visually impaired pedestrians to locate the push button. PROWAG requires that push buttons shall have a visual contrast with the body background of at least 70 percent.*

Impedence Category	Value	Weight
yes	0	10%
no	100	

(v) **Locator Tone.** *There shall be a locator tone complying with section 4E.10 of the Manual of Uniform Traffic Control Devices (MUTCD).*

Impedence Category	Value	Weight
yes	0	10%
no	100	

(vi) **Closed Fist Option.** *Pedestrian pushbutton shall be operable with a closed fist per PROWAG requirements.*

Impedence Category	Value	Weight
yes	0	10%
no	100	

(vii) **Clear Floor Space.** *The push button shall be mounted adjacent to a clear floor space or a landing on the pedestrian access route leading to the crosswalk. The clear ground space shall be at least 36 inches by 48 inches.*

Impedence Category	Value	Weight
yes	0	10%
no	100	

(viii) **Clear Floor Space Slope.** *The slope no more than 2% in any direction, and shall be provided with a stable, firm and slip resistant surface from which to operate controls. This clear floor space may overlap entirely with the pedestrian access route*

Impedence Category	Value	Weight
0-2%	0	10%
2-4%	20	
4-6%	40	
6%+	100	



- (ix) **Clear Floor Space Running Slope (Grade).** *Grade is defined as the slope parallel to the direction of travel. Both powered and manual wheelchairs can become unstable and/or difficult to control on sloped surfaces. PROWAG specifies that the ground space adjacent to the pushbutton be no greater than 2 percent.*

Impedance Category	Value	Weight
0-2%	0	10%
2-4%	20	
4-6%	40	
6%+	100	

Curb Ramp Impedance Score –

Focuses on curb ramp characteristics that directly affect the usability of a ramp and determines whether the facility’s features represent a low, medium, or high barrier to accessibility. The curb ramp impedance score is determined by two levels of consideration – locations where curb ramps are warranted but missing (*priority 1*); or, locations where curb ramps exist but have non-standard features (*priority 2*).

Weight	Indicator	Rating Value
100%	none	100%

Existing curb ramps with non-standard features (*priority 2 locations*) mean that: (a) the ramp width is too narrow; (b) the top landing is either missing or too narrow; (c) the ramp slope is too steep; etc. Impedance factors that describe the barriers to accessibility at priority 2 ramp locations are based on the following twelve factors (a possible 100 points):

- (i) **Ramp Surface Obstructions.** *Space is needed at the top and bottom of ramps so that people using wheelchairs can align with the running slope and maneuver from ramps, including when making turns (which is difficult on sloped surfaces). PROWAG R304.2.1 & R304.3.1 defines obstructions in the pedestrian environment as objects that limit the vertical passage space, protrude into the circulation route, or reduce the clearance width of the curb ramp.*

Weight	Indicator	Rating Value
10%	no obstruction	0%
	obstruction	100%

- (ii) **Alignment with Marked Crosswalks.** *Crosswalks are a critical part of the pedestrian network. A crosswalk is defined as “the portion of a roadway designated for pedestrians to use in crossing the street” and may be either marked or unmarked (ITE). PROWAG R207.1 specifies that curb ramps at marked crossings shall be wholly contained within the markings, excluding any flared sides.*

Weight	Indicator	Rating Value
10%	aligned	0%
	not aligned	100%

- (iii) **Detectable Warning Surface (DWS).** *Raised tactile surfaces used as warnings employ textures detectable with the touch of a foot or sweep of a cane to indicate hazards or changes in the pedestrian environment. PROWAG R208 & R305 specifies that tactile surfaces used as*

detectable warnings must also provide color contrast with surrounding surface materials.

Weight	Indicator	Rating Value
10%	present	0%
	non-standard	100%

- (iv) **Gutter Lip.** *Vertical changes that exceed 1/4 inch in elevation at the bottom of a ramp can cause front casters to swivel and impede the momentum needed to propel the chair up-slope at a curb ramp threshold. PROWAG R302.7.1 specifies that transitions from ramps to gutter and streets should be flush and free of level changes.*

Weight	Indicator	Rating Value
10%	0"-1/4"	0%
	1/4"-1/2"	20%
	1/2"+	100%

- (v) **Landing Panel Size.** *Landings allow wheelchair users space to maneuver off the curb ramp and onto the sidewalk. Curb ramps without landings force wheelchair users entering the ramp from the street, as well as people turning the corner, to travel on the ramp flares. Furthermore, people who are continuing along the sidewalk will not have to negotiate a surface with a changing grade or cross slope. PROWAG R304.2.1, R304.3.1 & R407.6 specifies that landings with a minimum length of 48 inches, the length of an occupied wheelchair, will provide sufficient turning space. Landing length is measured in the direction of travel to and from the ramp.*

Landings should be a minimum of 48 inches wide to prevent pedestrians from having to cross the curb ramp flare. If ramps change direction at landings, commonly known as parallel ramps, the minimum landing size should be 60 inches by 60 inches. This additional space helps avoid trapping the footrest of a wheelchair between opposing up-slopes.

Weight	Indicator	Rating Value
10%	48"+	0%
	36"-47"	40%
	0"-35"	60%
	none	100%

- (vi) **Landing Panel Slope.** *Level landings at the tops of curb ramps make it possible to change direction after completing the ascent, rather than during the rise, and to avoid traveling across the compound slope of a side flare when using the sidewalk rather than the curb ramp. PROWAG R407.6 specifies that ramps shall have level landings at bottom and top of each ramp and each ramp run. Landings are considered "level" when their slopes in the two perpendicular directions of travel do not exceed 2%.*

Weight	Indicator	Rating Value
10%	0-2%	0%
	2.1-4.0%	50%
	4.1%+	100%



- (vii) **Ramp Width.** *The recommended minimum curb ramp width is 48 inches. Where space is restricted, the width of the ramp can be reduced to 36 inches. PROWAG R302.3 specifies that the curb ramp width should never be less than 36 inches (exclusive of flared sides) because there is not enough space for people using assistive devices (e.g., wheelchairs, scooters, and crutches) to travel.*

Weight	Indicator	Rating Value
10%	0-2%	0%
	2.1-4.0%	50%
	4.1%+	100%

- (viii) **Ramp Flare Slope.** *The flared sides of curb ramps provide a graded transition between the ramp and the surrounding sidewalk. Flares are not considered an accessible path of travel because they are generally steeper than the ramp and often feature significant cross-slopes with excessive rate of change of cross-slope. PROWAG R302.7.4 specifies that a 10 percent flare slope is acceptable.*

Weight	Indicator	Rating Value
10%	0-10%	0%
	10.1-12%	50%
	12.1%+	100%

- (ix) **Ramp Panel Running Slope (Grade).** *The ramp panel running slope is the sloped transition between the street and the sidewalk. Steep grades*

are difficult for people who use walking aids and manual wheelchairs to negotiate because more energy is needed to begin and to travel on sloped surfaces. PROWAG R304.2.2, R304.3.2 & R304.4.1 specifies that the ramp panel running slope should not exceed 8.33%.

Weight	Indicator	Rating Value
10	0-8.33%	0%
	8.34-12%	50%
	12.1%+	100%

- (x) **Ramp Panel Cross Slope.** *A curb ramp allows people who use wheelchairs and other wheeled devices to negotiate the elevation change between the roadway and the sidewalk without having to negotiate the curb. People with mobility impairments often have difficulty negotiating a grade and cross slope simultaneously. Since the grade of the ramp will be significant, the cross slope should be minimized. PROWAG R302.6 specifies that ramp panel cross slopes should not exceed 2%.*

Weight	Indicator	Rating Value
10%	0-2%	0%
	2.1-4%	50%
	4.1%+	100%

- (xi) **Gutter Running Slope (Grade).** *The gutter is the roadway surface immediately next to the curb ramp that runs along the curb. At a curb ramp, the grade of the gutter is generally counter to the grade of the ramp. Excessive grade differences*

between gutter and ramp can cause a wheelchair to tip forward or flip over backward. According to PROWAG R304.5.4, the running slope of the gutter – measured parallel to the path of travel – should not exceed 5 percent. If the gutter running slope exceeds 5 percent, the rate of change of grade is likely to exceed 13 percent, depending upon the grade of the ramp.

Weight	Indicator	Rating Value
5%	0-5%	0%
	5.1-8%	50%
	8%+	100%

- (xii) **Gutter Cross Slope.** People with mobility impairments often have difficulty negotiating a grade and cross slope simultaneously. Since the grade of the ramp and gutter will be significant, the cross slope of both the ramp and gutter should be minimized. PROWAG R304.5.3 specifies that gutter cross slopes should not exceed 2%.

Weight	Indicator	Rating Value
5%	0-2%	0%
	2.1-5.0%	50%
	5.1%+	100%

- (xiii) **No Ramp.** Where public sidewalks are provided and pedestrian are directed to street crossings, curb ramps must be provided to eliminate a substantial barrier.

Weight	Indicator	Rating Value
100%	none	100%

Island Impedance Score –

Focuses on cut-through pedestrian refuge island characteristics that provide adequate stopping, queuing and passing places for pedestrian refuge safety. Facility location and characteristics determine whether the facility’s features represent a low, medium, or high barrier to accessibility. There shall be a flush landing within the cut and the edges of the cut shall be aligned perpendicular to the street being crossed, or parallel to the direction of the pedestrian access route if the pedestrian access route is not perpendicular to the street. The island impedance score is determined by two levels of consideration – locations where island cut-throughs are warranted but missing ; or, locations where islands cut-through exist but have non-standard features.

- (i) **Detectable Warning Surface (DWS).** Raised tactile surfaces used as warnings employ textures detectable with the touch of a foot or sweep of a cane to indicate hazards or changes in the pedestrian environment. PROWAG R208.1 or R208.2 specifies that tactile surfaces used as detectable warnings must also provide color contrast with surrounding surface materials.

Weight	Indicator	Rating Value
15%	present	0%
	non-standard	100%

- (ii) **Gutter Lip.** Vertical changes that exceed 1/4 inch in elevation at the bottom of a ramp can cause front casters to swivel and impede the



momentum needed to propel the chair up-slope at a curb ramp threshold. PROWAG 302.7.1 specifies that transitions from ramps to gutter and streets should be flush and free of level changes.

Weight	Indicator	Rating Value
15%	0"-1/4"	0%
	1/4"-1/2"	20%
	1/2"+	100%

(iii) **Refuge Island Width.** *The recommended minimum accessible route width is 60 inches. PROWAG R305.2.4 requires a five foot by five foot space as the minimum required for two persons traveling in opposite directions to wait, out of the street, for opportunities to continue crossing the street.*

Weight	Indicator	Rating Value
15%	60"+	0%
	48"-60"	50%
	0"-47"	100%

(iv) **Refuge Island Floor Running Slope (Grade).** *The access route running slope is the sloped transition between the street and the sidewalk. Steep grades are difficult for people who use walking aids and manual wheelchairs to negotiate because more energy is needed to begin and to travel on sloped surfaces. PROWAG R302.5 specifies that the access route running slope should not exceed 5%.*

Weight	Indicator	Rating Value
15%	0-8.33%	0%
	8.34-12%	50%
	12.1%+	100%

(v) **Refuge Island Floor Cross Slope.** *The pedestrian access route within the island refuge area allows people who use wheelchairs and other wheeled devices to negotiate the elevation change along the route without having to negotiate changing slopes. People with mobility impairments often have difficulty negotiating a grade and cross slope simultaneously. Since the grade of the ramp will be significant, the cross slope should be minimized. PROWAG R302.6 specifies that island refuge cross slopes should not exceed 2%.*

Weight	Indicator	Rating Value
10%	0-2%	0%
	2.1-4%	50%
	4.1%+	100%

(vi) **Gutter Running Slope.** *The gutter is the roadway surface immediately next to the island entry point. At the island entry point, the grade of the gutter may be counter to the grade of the island entry. Excessive grade differences between gutter and island entry can cause a wheelchair to tip forward or flip over backward. According to PROWAG R304.5.4, the running slope of the gutter – measured parallel to the path of travel – should not exceed 5 percent. If the gutter running slope exceeds 5 percent, the rate of change of grade is likely to exceed 13*

percent, depending upon the grade of the island access route.

Weight	Indicator	Rating Value
10%	0-5%	0%
	5.1-8%	50%
	8%+	100%

(vii) **Gutter Cross Slope.** *People with mobility impairments often have difficulty negotiating a grade and cross slope simultaneously. Since the grade at the island entry and gutter will be significant, the cross slope of both the island entry point and gutter should be minimized. PROWAG R304.5.3 specifies that gutter cross slopes should not exceed 2%.*

Weight	Indicator	Rating Value
10%	0-2%	0%
	2.1-5%	50%
	5%+	100%

(viii) **No Cut-Through.** *Where street crossing direct pedestrian access to refuge islands, refuge must be provided to a safe crossing.*

Weight	Indicator	Rating Value
100%	none	100%



SUMMARY

SUMMARY REPORT OF SIDEWALK, SIGNALS, CURB RAMP & ISLAND INVENTORY

To comply with ADA requirements, sidewalks and curb ramps must meet specific standards for width, running slope, cross slope, placement, and other features.

The ADA Sidewalk and Curb Ramp Self-Evaluation project generated a significant amount of data regarding the accessibility of public rights-of-way in City of Clayton. The following represents a summary of findings regarding the information gathered. The transition plan denotes planned action steps to improve access where barriers were identified.

Sidewalk Data –

Detailed documentation and data on the accessibility of City of Clayton sidewalks is found in the Appendix of this report.

1. Sidewalk obstructions

Fixed obstructions	32
Vegetative obstructions	*1,259

* Per city ordinances private property owners are responsible for vegetation encroaching into ROW

2. Sidewalk changes in level

Total	8293 instances
0.25" - 0.5"	5410 instances
0.51" - 0.75"	2883 instances
+0.75"	62 instances

3. Non-standard Sidewalk grade

Total	9.34 miles
5% - 8.33%	7.41 miles
8.34% - 10%	1.15 miles
10.1% - 12.5%	0.4 miles
> 12.5%	0.38 miles
Deemed technically infeasible	0 miles

4. Non-standard sidewalk cross slope

Total:	30.9 miles
2 - 4%:	30.1 miles
4.1 - 6%:	0.8 miles
6.1 - 8%	0 miles
8.1 - 10%	0 miles
> 10%	0 miles



5. Sidewalks with either a non-standard cross slope or grade

Including grade deemed technically infeasible	<i>35.6 miles</i>
Excluding grade deemed technically infeasible	<i>35.6 miles</i>

Signal Data –

Detailed documentation and data on the accessibility of City of Clayton signals is found in the Appendix of this report.

1. Pedestrian Pushbutton

Pushbutton exists	<i>55</i>
Pushbutton missing	<i>39</i>

2. Pushbutton size

Diameter > 2” (standard)	<i>47</i>
Diameter < 2” (non-standard)	<i>1</i>

3. Pushbutton height

Height < 42” (non-standard)	<i>12</i>
Height 42”-48” (standard)	<i>40</i>
Height > 48” (non-standard)	<i>0</i>

3. Pushbutton contrast

Yes (standard)	<i>25</i>
No (non-standard)	<i>1</i>

3. Locator tone

Yes (standard)	<i>44</i>
No (non-standard)	<i>0</i>

3. Clear Floor Space

Yes (standard)	<i>44</i>
No (non-standard)	<i>8</i>

Accessible Parking Data

1. Accessible Parking Space

Accessible Spaces (standard)	<i>7</i>
Accessible Spaces (non-standard)	<i>20</i>

2. Accessible Aisle

Accessible Aisle (standard)	<i>5</i>
Accessible Aisle (non-standard)	<i>22</i>

Street Furniture (Benches)

1. Benches

Benches (standard)	7
Benches (non-standard)	20

Curb Ramp Data - Detailed

documentation on the accessibility of City of Clayton curb ramps is found in the Appendix of this report.

1. Ramp type data

Perpendicular ramp configuration	662
Parallel ramp configuration	25
Blended Transition ramp configuration	8
Island Perpendicular ramp configuration	10
Island Parallel ramp configuration:	0
No ramp configuration	88

2. Flare data

Slopes ≤10% (standard)	48
Slopes between 10.1% – 12% (non-standard)	10
Slopes > 12% (non-standard)	552

3. Ramp landing panel data

Depth greater than or equal to 48” (best practice)	440
Depth 48” (standard)	142
Depth smaller than 48” (non-standard)	57
None present (non-standard)	70
Slopes > 2% (non-standard)	326

4. Ramp panel data

Width greater than or equal to 48” (best practice)	493
Width < 48” (non-standard)	196
Running slope < 8.3% (standard)	359
Running slope between 8.31% - 10% (non-standard)	121
Running slope > 10% (non-standard)	226
Cross slope ≤ 2% (standard)	363
Cross slope between 2% - 4% (non-standard)	199
Cross slope > 4% (non-standard)	144

Table continues.



continues

Ramps with both running slope < 8.3% (standard) and cross slope < 2% (standard)	197
Ramps with both running slope > 8.33% (non-standard) and cross slope > 2% (non-standard)	53

5. Gutter data

Running slope ≤ 5% (standard)	487
Running slope > 5% (non-standard)	224
Cross slope ≤ 2% (standard):	343
Cross slope > 2% (non-standard)	368
Gutter Lip	209

6. Ramps lacking detectable warning surface (non-standard)

Total	267
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Island Refuge Data -

Detailed documentation on the accessibility of City of Clayton island refuge is found in the Appendix of this report.

1. Refuge Width

Width > 60"	9
Width < 60"	7

2. Refuge Slope

Slope > 5%	3
Slope < 5%	13

3. Refuge Cross Slope

Slope > 2%	10
Slope < 2%	6

SIDEWALK, SIGNALS, CURB RAMP & ISLAND INVENTORY FINDINGS

One of the primary functions of any city is to provide safe and inviting pedestrian paths of travel.

Pedestrian traffic encourages interaction between citizens, strengthens neighborhoods and contributes to the vitality of its community. People with disabilities depend on a safe and accessible pedestrian system to conduct their daily lives. However, many of the elements and conditions that go unnoticed by nondisabled persons pose significant impediments to disabled persons. Ambulatory pedestrians can simply walk around an obstruction in the sidewalk or step off a curb face without much notice, however for individuals who use wheelchairs, these ordinary features become a major impediment. A sighted person can duck under an overhanging tree limb, but to a blind person, the presence of the limb is not readily apparent and may cause physical injury. As compared to the general population, people with disabilities are generally more reliant on pedestrian networks. A large portion of the disabled population does not drive and depend on self-mobility or public transportation to get around. These factors, coupled with an aging population (where disabling conditions increase dramatically) highlight the importance of pedestrian systems that will serve all populations within the community, both in the present and into the future. ♿





SIDEWALK INVENTORY - FINDINGS

This section of the ADA Self-Evaluation Report provides an overview of the findings of the City of Clayton's sidewalk network.

Accessible sidewalks enable people with disabilities to reach their desired destinations in the community and to enjoy the benefits of city services, programs, and activities. Where sidewalks are provided, public agencies are required to ensure that continuous, unobstructed sidewalks are maintained in operable working condition.

Total Sidewalk collected: 55 miles

▶ OBSTRUCTIONS



Obstructions in the pedestrian environment are defined as objects that limit the vertical and horizontal passage space, protrude into the circulation route, or reduce the clearance width of the sidewalk.

Obstructions come in a variety of forms, ranging from movable obstructions such as a car parked across a sidewalk or an overgrown flowerbed to more durable obstructions like utility poles, fire hydrants, or sidewalks that are too narrow to accommodate the 48" by 80" path of travel. Obstructions with large overhangs that protrude

into the path of travel can be hazardous for people with visual impairments if they are difficult to detect. Obstructions that reduce the minimum clearance width, such as fire hydrants on a narrow sidewalk, can create significant barriers for wheelchair or walker users.

The following is a table summarizing the obstruction type and instances that were identified.

Obstruction Type	Number	Percentage of Total
Fencing	11	34.5%
Light Poles	8	25%
Tree Wells	4	12.5%
Fire Hydrant	4	12.5%
Signal Posts	4	12.5%
Utility Poles	1	3%
Total Fix Obstructions	32	100%
Total Vegetation Obstructions	1,259	100%

Recommended Actions: -

Work-around solutions are often recommended to address fixed obstructions. Work-around solutions usually either relocate an obstruction or widen a small portion of the sidewalk to restore an accessible route. Examples of work-around solutions include an obstructing utility pole, where a sidewalk can be widened to accommodate both a utility pole and

an accessible route. The second example might be a hydrant obstructing a curb ramp and how the hydrant can be located out of the pedestrian route and camouflaged by landscaping. Another might be a signal post obstructing the top landing of a curb ramp and a signal post built into a concrete bulb to accommodate both pedestrian pole access and sidewalk and landing access.

Vegetation is by far the most common obstruction in most cities' pedestrian networks. When bushes or tree branches force pedestrians to turn back or move into the path of automobile traffic, they present serious obstacles to accessibility. The City of Clayton Forestry Division has a successful on-going campaign to address tree trimming along public right-of-way corridors.

▶ CHANGES IN LEVEL



Changes in level are defined as vertical height transitions between adjacent surfaces or along the surface of a path. In the sidewalk environment, curbs with cracks, and dislocations in the surface material are examples of changes in level. The texture and continuity of sidewalk surfaces has a significant impact on sidewalk accessibility. People who use wheelchairs, crutches, canes, or walkers are particularly sensitive to tripping



hazards. Abrupt changes in level can be painful for those individuals who utilize wheelchairs or other mobility devices. People with mobility impairments need a stable and regular surface for unimpeded access to sidewalks.

Heaving can affect all kinds of sidewalk surfaces. Concrete sidewalks are harder and whole panels (or panel pieces) tend to move as separate units, creating problems at the panel transitions where changes in level occur. Asphalt is more malleable and deforms in response to pressure. Thus, when trees roots push up under a sidewalk, asphalt tends to conform to the shape of the roots creating a situation where several rounded protrusions can disrupt ease of pedestrian movement.

City of Clayton's sidewalk inventory project identified a total of 8,293 sidewalk locations with a change in level (heave). A majority - 65% of the heaves fall in the 0.25 to 0.5 inch category. Only 62 (1%) one percent have a vertical displacement of 0.76 inch or greater. The data show that although minor sidewalk surface irregularities are common, only a small number of heaves have the potential to severely affect accessibility. The City of Clayton has an established Sidewalk Improvement program that targets the elimination of joint displacement through grinding or removal and replacement of sidewalk. The program's average funding is \$40,000 to \$50,000 per year.

Heave Category	Heave Height	Total Number
C1	0.25"-0.5"	5410
C2	0.51"-0.75"	2883
C3	0.75"-1"	45
C4	>1"	17

▶ GRADE (RUNNING SLOPE)



Steep sidewalk grades are a barrier for many pedestrians. Powered and manual wheelchairs can become unstable and/or difficult to control on sloped surfaces. These areas are even more difficult for sidewalk users who are disabled to access when wet.

Grade (running slope) is defined as the slope parallel to the direction of travel and is calculated by dividing the vertical change in elevation by the horizontal distance covered. Although some guidelines use the term "running slope" instead of "grade," the term "grade" is used in this report to avoid confusion with cross-slope.

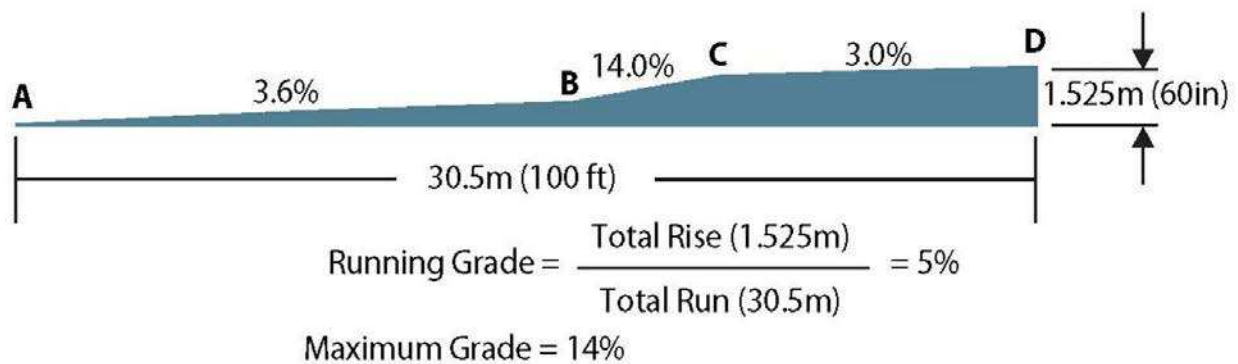
03/ SELF-EVALUATION OF INFRASTRUCTURE Sidewalk and Curb Ramps

Running grade is defined as the average grade along a contiguous sidewalk segment. Measuring running grade only does not give an accurate understanding of the sidewalk environment because small steep sections may not be detected.

Maximum grade is defined as a limited section of path that exceeds the typical running grade. The image below provides an example of a typical grade that is fairly negotiable, with a maximum grade that could be very difficult for some users to traverse. In the illustration, the running grade between Points A and D is 5 percent, but the grade between Points B and C is 14 percent. A person who could negotiate a 5 percent grade might not be able to negotiate a 14 percent grade, even for short distances

Reflected in the following table are the results of the sidewalk grade analysis, which shows the total miles of sidewalk in the city that do not meet grade standards. To accurately reflect the rate of change for grade over small distances, City of Clayton’s self-evaluation inventory classifies non-standard sidewalk segments into four grade designations. City of Clayton inventory results show 44.6 miles (82%) of sidewalk that are compliant and meet minimum grade requirements.

Grade Category	Length	%
5-8.33%	7.41	80%
8.34-10%	1.15	12%
10.1-12.5%	0.4	4%
>12.5%	0.38	4%
Sub_total	9.34	100%





Under some conditions, the City is limited in its ability, or completely unable, to provide sidewalks and curb ramps that meet PROWAG grade requirements because of existing site constraints. According to PROWAG guidelines, sidewalk grade should not exceed 5 percent. However, grades are often too difficult to control in the sidewalk environment because sidewalks follow the path of the street and the natural topography of the area. The GIS database played a pivotal role in determining which of the non-standard sidewalk grade profiles were deemed technically infeasible due to roadway topographic factors. Cole & Associates developed a GIS script that enabled a comparison of every non-standard sidewalk segment to the grade of the adjacent roadway. Adjacent roadway grade profiles were derived from a digital elevation model, a representation of ground surface topography. Criteria were then used to filter out 9.34 miles of non-standard sidewalk grade locations deemed technically infeasible.

Cole and the city's decision to screen profile data is consistent with currently recommended best practices from the U.S. Access Board and FHWA to make allowances for the sidewalk grade that follow the grade of the associated roadway, instead of the 5% maximum grade for walkways or an 8.3% maximum grade for ramps. In situations like these, the Department of Justice notes that "occasionally the nature of a facility makes it impossible to comply with all of the alteration standards. In such a case, features must only be made accessible to the extent that it is technically feasible to do so."

Determining Technical Infeasibility: DEM Lidar data for Clayton was obtained from the MSDIS website. The DEM data and the street centerlines feature class were brought into the software, Arcmap. The *Add Surface Information from*

the Functional Surface tool set was used to determine street slope. The resulting data was then summarized by casename to calculate the average slope for each street. The final street elevation feature class was then applied to the running slope feature class to determine technical infeasibility.

► CROSS SLOPE



Cross slope is defined as the slope measured perpendicular to the direction of travel. Most sidewalks are built with some degree of cross slope to allow water to drain into the street and to prevent water from collecting on the path. Excessive cross slope on sidewalks is a major issue for pedestrians who use wheelchairs, scooters, walkers, and crutches. In severe cross slopes, sidewalk users must maintain their lateral balance

because they must work against the force of gravity. People using canes or crutches may be forced to turn sideways in order to keep their base support at a manageable angle. Because the cross slope of a sidewalk is typically toward the roadway, the pedestrian who loses traction or balance will be directed toward the street.

Reflected in the table below are the results of the sidewalk cross slope analysis, which shows that there are approximately 30.9 miles of non-standard (greater than 2 percent cross slope) sidewalk in the city. To accurately detail the rate of change for cross slope over small distances, City of Clayton’s self-evaluation inventory classifies all non-standard sidewalk segments. City of Clayton inventory results show 23.7 miles (43%) of sidewalk that is compliant and meets minimum grade requirements.

Cross Slope Category	Total Length (Miles)
2-4%	30.1
4-6%	0.8
6-8%	0
8-10%	0
10% +	0
Sub-total	30.9
Compliant	23.7
Total	54.6

Driveway crossings are often built with grade changes in the sidewalk corridor that have cross

slopes greater than 2 percent. To maintain an acceptable cross slope and facilitate wheelchair movement at driveways, the City of Clayton employs a standard construction detail for accessible driveway design. Standard Detail SD-5 located in the “Public Right-of-Way Standard Details” provide the design limits with built in tolerances to ensure compliance with ADA guidelines. The detail can be found on the City’s website.

▶ SIDEWALK BARRIER RANKING ANALYSIS

Although ADA tells us which sidewalk features are non-standard it does not offer guidance on the priority for which non-standard sidewalk location should be repaired or replaced first. The final stage of the ADA Self-Evaluation Report process was to screen the total sidewalk block faces in Clayton (54.6 miles) to determine which of these sites required more immediate attention.

Sidewalk activity and impedance scores found in the technical appendix report were sorted according to their magnitude and divided into three categories (high/ medium/low) using natural breaks. The sidewalk block face natural break categories are as follows: (i) activity score (low = 0-33; medium = 34-56; high = 57-100); and, (ii) impedance score (low = 0-5; medium = 6-35; high = 36-100).

As indicated in the table below, of the 574 sidewalk block faces in Clayton: (i) no sidewalk (the smallest share) had a combined high impedance and high activity score and, (ii) 31 percent (the largest share) had a combined low impedance and low activity score (together, these 171 sidewalk block faces represent 17.1 miles of sidewalk).



Sidewalk Block Face Activity and Impedence Ranking

Activity	Impedence	Block Faces	Mileage	%
High	High	0	0	0%
High	Medium	21	2.1	4%
High	Low	93	8.4	15%
Medium	High	0	0	0%
Medium	Medium	58	6.9	13%
Medium	Low	167	15.9	29%
Low	High	1	0.06	0.1%
Low	Medium	37	4.1	8%
Low	Low	171	17.1	31%
Total		548	54.6	100%

Data for sidewalk activity and impedance was layered to derive a composite barrier ranking score for a particular block face. Reflected in the table below are the final results of the barrier ranking analysis; categorized using natural

breaks as follows: low = 0-35; medium = 36-58; high = 59-121. As indicated, 24% (the smallest share) had a high barrier ranking. Together, this represents 130 block faces and 12 miles of sidewalk.

Barrier Ranking	Block Faces	Mileage	%
High	130	12	24%
Medium	186	24	34%
Low	213	18	42%
Total	548	54	100%

SIGNAL INVENTORY – FINDINGS

This section of the ADA Self-Evaluation Report assesses the status of City of Clayton’s pedestrian signal locations.

An accessible pedestrian signal and pedestrian pushbutton is an integrated device that communicates information about the WALK and DON’T WALK intervals at signalized intersections in non-visual formats to pedestrians who are blind or have low vision. Pedestrian signals and all connecting pathways shall be designed, constructed, operated and maintained so that all pedestrians, including people with disabilities, can travel safely and independently.

Title II of the ADA requires state and local governments to make pedestrian crossings accessible to people with disabilities by providing accessible pedestrian signals where warranted with appropriate engineering studies. To comply with ADA requirements, the accessible pedestrian signals provided must meet specific standards for pushbuttons, clear floor space, audible walk indicators, signage, and other features. These guidelines are summarized below.

▶ SIGNAL ASSESSMENT

Over the course of the pedestrian signal inventory, Cole assessed 22 pedestrian signalized intersections. At each of these locations the field, technicians noted the absence or presence of a pushbutton, and in the case of an existing pushbutton, measured its features based on PROWAG Guidelines and MUTCD standards. Technicians began by classifying each pedestrian street crossing location by noting “none”

Signal Feature	# of Type	% of Total Signals	# non-standard	% non-standard
Button height	46	55	12	26
Button diameter	46	55	0	0
Button pressure	46	55	9	20
Button contrast	46	55	3	6
Locator tone	46	55	4	9
Closed Fist Option	46	55	0	0
Clear Floor Space	46	55	4	9
Clear Floor Space	46	55	20	43



(meaning there were no pedestrian signal/pushbutton features); or identifying and assessing the components of pedestrian signal/pushbutton features for each signal location. Cole assessed 94 separate pedestrian signalized street crossing locations while collecting data on 46 individual pedestrian signal locations with pedestrian pushbutton features. The remaining pedestrian signal locations, that do not possess a pedestrian pushbutton, have pre-timed signals that do not require a pedestrian pushbutton.

▶ SIGNAL FEATURES

- i. **Pushbutton Height** - *The mounting height of the centerline of the push button shall be mounted 42 inches above the clear ground space for approach to the device. The operable reach limits for the pushbutton should be a maximum height of 48 inches. Where a pushbutton is provided, it shall be integrated into the accessible pedestrian signal and shall comply with PROWAG R306.2.*
- ii. **Pushbutton Diameter** - *The diameter of the pushbutton shall be a minimum of 2 inches across in at least one dimension. A majority - 100% of the pushbuttons measured where in the 2 inch or larger category.*
- iii. **Pushbutton Pressure** - *The force applied to the pushbutton to activate the push buttons shall be no greater than 5 pounds. Compliance with this component shall follow PROWAG R403.4.*
- iv. **Pushbutton Contrast** - *Button contrast in the pedestrian environment provides for a visual contrasting button compared to the button housing mechanism. Visual contrast and a locator tone enable blind or visually impaired pedestrians to locate the push button. PROWAG requires that push buttons shall have a visual contrast with the body background of at least 70 percent.*
- v. **Locator Tone** - *A pushbutton locator tone is "A repeating sound that informs approaching pedestrians that they are required to push a button to actuate pedestrian timing receive additional information and that enables pedestrians with visual disabilities to locate the pushbutton." (MUTCD 2009, Section 4E.12)*
- vi. **Closed Fist Option** - *A pedestrian pushbutton shall be operable with a closed fist per PROWAG requirements. Recessed buttons with small diameters does not meet the closed fist test for controls and operating mechanisms.*
- vii. **Clear Floor Space** - *The push button shall be mounted adjacent to a clear ground space or a landing on the pedestrian access route leading to the crosswalk. The clear floor space shall be at least 36 inches by 48 inches, and shall be provided with a stable, firm and slip resistant surface from which to operate controls. This clear floor space may overlap entirely with the pedestrian access route.*
- viii. **Clear Floor Space Slope & Running Slope** - *The slope shall be no more than 2% in any direction. Users of wheelchairs and mobility aids need to be able to push the button from a level surface.*

SIGNAL BARRIER ANALYSIS RANKING

Although ADA tells us which signal features are non-standard; it does not offer guidance on which non-standard signal location should be replaced first. The final stage of the ADA Self-Evaluation Report process was to screen the 94 signal locations at 22 signalized intersections documented in the field inventory to determine which of these sites required more immediate attention.

Signal activity and impedance scores – found in the technical appendix report – were sorted according to their size and divided into three

categories (high/medium/ low) using natural breaks. The signal natural break categories are as follows: (i) activity score (low = 0-45; medium = 46-64; high = 65-100); and, (ii) impedance score (low = 0-12; medium = 13-32; high = 33-100).

As indicated in the table below, of the 94 signal locations recorded:

- **2 percent** (the smallest share) had a combined medium impedance and medium activity score.
- **38 percent** (the largest share) had a combined low impedance and high activity score.

Activity	Impedence	Signals	Percent
High	High	9	10%
High	Medium	7	7%
High	Low	36	38%
Medium	High	7	7%
Medium	Medium	2	2%
Medium	Low	14	15%
Low	High	9	10%
Low	Medium	6	7%
Low	Low	4	4%
Total		94	100%



Data for the signal activity and impedance were layered to derive a composite barrier ranking score for a particular intersection location. Reflected in the table below are the final results of the barrier ranking analysis; categorized using natural breaks as follows: low = 0-58; medium = 59-88; high = 89-132. As indicated, 26.5% had a high barrier ranking. Together, this represents xx pedestrian signal locations .

Barrier Ranking	Signals	%
High	25	26.5%
Medium	56	59.5%
Low	13	14%
Total	94	100%

CURB RAMP INVENTORY - FINDINGS

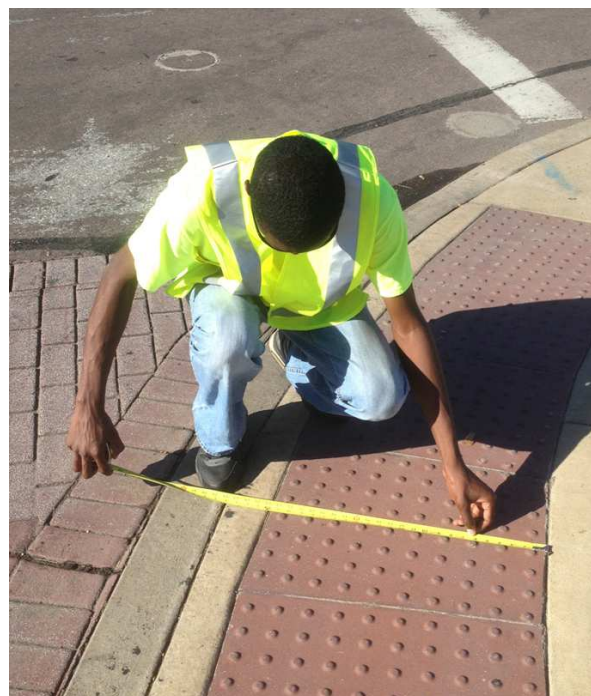
This section of the ADA Self-Evaluation Report assesses the status of City of Clayton’s ramp locations.

Curb ramps are structural features that ease access to and from sidewalks, and are a critical part of the City of Clayton’s pedestrian network. Well-built and strategically located curb ramps greatly improve connectivity and safety on the sidewalk

network. Without curb ramps, people who use wheelchairs would not be able to independently access the sidewalk and street.

Title II of the ADA requires state and local governments to make pedestrian crossings accessible to people with disabilities by providing curb ramps. To comply with ADA requirements, the curb ramps provided must meet specific standards for width, running slope, cross slope, placement, and other features. These guidelines are summarized below:

▶ CURB RAMP CATEGORIES



Over the course of the curb ramp inventory, Cole assessed 793 ramp locations. At each of these locations the field technicians noted the absence or presence of a ramp, and in the case of an existing ramp, measured its features based on PROWAG Guidelines. Surveyors began by

classifying the ramp as one of the following: “none” (meaning there was sidewalk but no ramp access and a new curb ramp is warranted); or one of four existing ramp types (perpendicular, parallel, island/median, or blended transition). Cole’s field technicians identified 100 “none” locations. The figure below represents the 705 existing ramps and denotes their ramp type. The figure below represents the 705 existing rampes and denotes their ramp type.

Existing Curb Ramps By Category

Ramp Type	Total	Percentage
Perpendicular Ramps	662	94%
Parallel Ramps	25	4%
Island/Median Ramp	10	1%
Blended Ramps	8	1%
Total	705	100%

Ramp Descriptions:

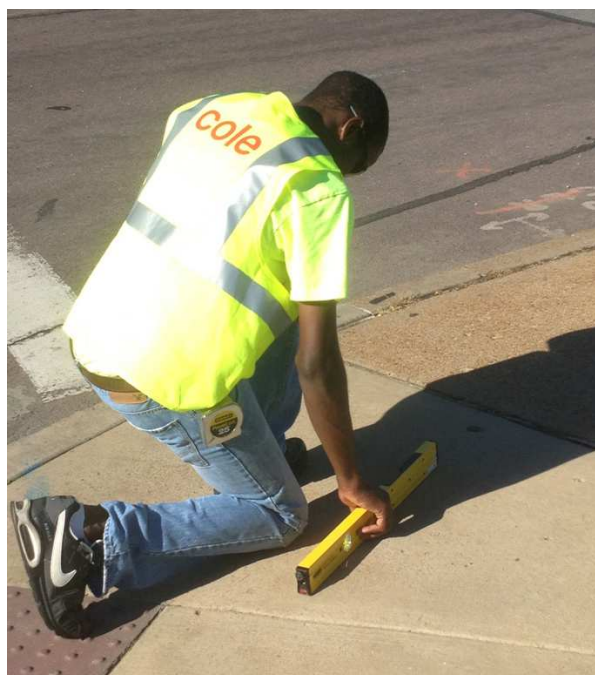
- **Perpendicular ramps** are situated perpendicular to the sidewalk path of travel and users will generally be traveling perpendicular to vehicular traffic when they enter the street at the bottom of the ramp. They often include flares to mediate the transition between the sidewalk level and the downward sloping ramp panel.
- A **parallel curb ramp** has two ramps leading down toward a center level landing at the bottom between both ramps with

a level landing at the top of each ramp. A parallel curb ramp is one that is oriented so that the path of travel on the ramp is parallel to the vehicular path of travel on the adjacent street and user’s path of travel on the sidewalk.

- **Island/median ramps** are not defined by their structural form, but by their location on an island or median. Like diagonal ramps, island/median ramps can be configured as perpendicular, parallel, or directional ramps. They often share a large landing panel which directs pedestrians from the ramp on one side of an island to the ramp on the other side. They sometimes have returned curbs (raised curb segments that separate the pedestrian path of travel from potential hazards) as a way to direct pedestrians through the cut through.
- Although not required by PROWAG, cut-throughs are preferred over ramps, as most islands are not large enough to comfortably fit two ramps and a 4-foot level landing between the ramps as required by ADA.



► CURB RAMP ASSESSMENT



PROWAG sets guidelines for each ramp feature. The federal standards outlined below correspond to the following features: (i) flares; (ii) ramp panels; (iii) transitions; (iv) gutters; (v) landing panels; and (vi) detectable warnings. For each feature there is also a discussion of City of Clayton's curb ramp inventory findings.

- i. **Ramp flares** are panels on either side of a ramp to mediate the difference between the sidewalk level and the descending ramp panel. Because they are usually accessible from the sidewalk and function as an entry point from the sidewalk to the ramp when the ramp landing is blocked or missing, they should not be excessively steep. Ramps do not need to have flares to align with PROWAG Guidelines, but if they do have them, the flare slopes must not exceed 10% in any direction. The field team found

Curb Feature	# of type	% of Total curbs	# non-compliant	% non-compliant
Ramp Flares	636	79	562	88
Ramp Landing	640	79	127	20
Ramp Panels	705	88	212	30
Ramp Running Slope	705	88	347	49
Ramp Cross Slope	705	88	343	49
Gutter Running Slope	705	88	224	32
Gutter Cross Slope	705	88	368	52
Gutter Lip	705	88	209	30
Detectable Warning	442	55	267	60

that 636 (79%) of the 705 existing ramps had flares. Of the 636 ramps with flares, 74 (12%) were standard (flare is $\leq 10\%$) and 562 were non-standard (flare is $10.1\%+$).

- ii. **Ramp landings** are the level panel at the top of a perpendicular or directional ramp and at the bottom of a parallel ramp. Landing panel accessibility is based on slope and size. PROWAG R304.3.1, R304.2.1 & R407.6 specifies that landings with a minimum length of 48 inches (the length of an occupied wheelchair) will provide sufficient turning space. Landing length is measured in the direction of travel to and from the ramp. The field team found that of the 705 existing ramps: (i) 513 (80%) were standard with landing panels $\geq 48"$ and 127 (20%) were with landing panels that were non-standard with no landing panel. Slope is an important accessibility measure for landing panels. PROWAG specifies that landing panel slopes should not exceed 2% in any direction. Since landing panels are a place where pedestrians will pause and reorient themselves either toward the sidewalk (in the case of a perpendicular ramp) or toward the street, these spaces should be flat. The field team found that 127 (20%) of the 705 existing ramps had non-standard ramp panel slopes of greater than 2%.
- iii. **Ramp panels** bring a pedestrian from the level of the sidewalk down to the level of the street. They are components of all ramps. Ramp panel standards are based on ramp width, ramp running slope, and ramp cross slope. Most wheelchairs have a minimum width of 28"; 48" of width is necessary to ensure adequate space for wheelchair users or pedestrians with

crutches, walkers, or canes to pass safely and comfortably. Of the 705 ramps surveyed for ramp width, the survey team found that 493 (70%) followed best practices & PROWAG Guidelines with a width greater than or equal to 48" and (ii) 212 (30%) were non-standard with a width of less than 48".

- iv. **Running slope** is measured parallel to the direction of pedestrian travel. Regardless of ramp type, PROWAG requires ramp panel running slopes to measure 8.3% or less. A ramp that is too steep makes it difficult for pedestrians with limited mobility to ascend or descend. Of the 705 ramps measured for ramp panel running slope, the survey team found 359 (51%) had standard running slopes of less than 8.3%, 121 (17%) had non-standard running slopes of 8.3-10%; and 226 (32%) had highly non-standard running slopes greater than 10%.
- v. **Ramp panel cross slope** is measured perpendicular to the direction of travel. Like running slope, excessive cross slope poses a challenge for pedestrians with limited mobility by impairing stability. Regardless of ramp type, PROWAG requires cross slopes of less than 2%. of the 705 ramps measured for ramp panel cross slope, the survey team found 362 (51%) met PROWAG standards with cross slopes of less than 2%; and 343 (49%) were non-standard with cross slopes in excess of 2%.
- vi. **Gutter running slope** is measured in the gutter below the ramp, parallel to the path of travel. Steep gutter running slopes can make it difficult for a person in a wheelchair to make the transition between the ramp and the street. PROWAG requires gutter running slope to be no more than 5%.



The survey team found that of the 705 ramps measured: 482 (68%) had standard gutter running slopes no more than 5% and 224 (32%) had non-standard gutter running slopes in excess of 5%.

vii. **Gutter cross slope** is measured in the gutter below the ramp, perpendicular to the path of travel. An excessive gutter cross slope can decrease stability for disabled pedestrians. PROWAG requires gutter cross slope to be no more than 2%. The survey team found that 368 ramps, or 52% of the 705 measured, had non-standard gutter cross slopes in excess of 2 percent.

viii. **Gutter Lip:** Vertical changes that exceed 1/4 inch in elevation at the bottom of a ramp can cause front casters to swivel and impede the momentum needed to propel the chair up-slope at a curb ramp threshold. PROWAG 3027.2 specify that transitions from ramps to gutter and streets should be flush and free of level changes. The survey team found that 209 (30%) of the 705 ramps measured had gutter lip heights that exceeded 0.5" which is considered a trip hazard.

ix. **Detectable warning surfaces** are textured pads that provide pedestrians who are blind a tactile warning at the street edge of the change from pedestrian to vehicular way. Detectable warning surfaces are required on all ramps. Standard detectable warnings consist of a high-contrast color panel with truncated domes (bumps) located adjacent to the gutter transition. The survey team found that 264 (37%) of the 705 ramps measured were non-standard because they lacked detectable warnings.

x. **Transition** is the place where the ramp crosses the curb area to meet the gutter. In addition to contributing to a user's dynamic instability, curb ramp lips will also change the angle of the wheelchair as if the wheelchair were on an increased grade. For example, if a ramp is designed with an 8.3 percent slope and has a 3/4" lip at the bottom of the ramp, the actual grade the wheelchair user has to negotiate is 11.6 percent. PROWAG requires a smooth transition between the gutter and ramp

▶ CURB RAMP BARRIER ANALYSIS RANKING



Although ADA tells us which ramp features are non-standard; it does not offer guidance on which non-standard ramp location should be replaced first. The final stage of the ADA Self-Evaluation Report process was to screen the 705 ramp locations documented in the field inventory to determine which of these sites required more immediate attention.

03/ SELF-EVALUATION OF INFRASTRUCTURE Sidewalk and Curb Ramps

Curb ramp activity and impedance scores found in the technical appendix report were sorted according to their size and divided into three categories (high/medium/low) using natural breaks. The curb ramp natural break categories are as follows: (i) activity score (low = 0-26; medium = 27-51; high = 52-100); and, (ii) impedance score (low = 0-32; medium = 33-72; high = 73-100).

As indicated in the table below, of the curb ramp locations recorded:

- **1 percent** (the smallest share) had a combined high impedance and high activity score.
- **23 percent** (the largest share) had a combined low impedance and medium activity score.

Activity	Impedance	Ramps	Percent
High	High	9	1
High	Medium	82	10
High	Low	83	10
Medium	High	54	7
Medium	Medium	189	23
Medium	Low	126	16
Low	High	44	6
Low	Medium	111	14
Low	Low	108	13
Total		805	100



Data for the curb ramp activity and impedance were layered to derive a composite barrier ranking score for a particular block face. Reflected in the table below are the final results of the barrier ranking analysis; categorized using natural breaks as follows: low = 0-59; medium = 61-98; high = 99-156. As indicated, 18.2% (the smallest share) had a high barrier ranking. Together, this represents 129 curb ramp or no curb ramp locations .

Barrier Ranking	Curb Ramps	Percent
High	129	18.2%
Medium	383	54.4%
Low	193	27.4%
Total	705	100%

ISLAND REFUGE INVENTORY - FINDINGS

This section of the ADA Self-Evaluation Report assesses the status of City of Clayton’s Island refuge (curb cut-through) locations.

Island refuge locations are structural features that ease access to and from sidewalks, and are a critical part of the City of Clayton’s pedestrian network. Island refuge areas are typically established to provide a resting area and minimize street intersection crossing distance. Island refuge routes shall have a flush landing within the cut and the edges of the cut shall be aligned perpendicular to the street being crossed, or parallel to the direction of the pedestrian access route if the pedestrian access route is not perpendicular to the street.

▶ ISLAND REFUGE ASSESSMENT

Title II of the ADA requires state and local governments to make pedestrian street crossings accessible to people with disabilities by providing island refuge areas. To comply with ADA requirements, the island refuge areas provided, must meet specific standards for width, running slope, cross slope, placement, and other features. 25 individual islands were present along accessible routes and within public right-of-way. 9 of the 25 islands identified had no curb ramps or refuge access aisles necessary for a pedestrian access route. These guidelines are summarized below.

03/ SELF-EVALUATION OF INFRASTRUCTURE Sidewalk and Curb Ramps

Island Curb Feature	# of Type	% of Total Island Curbs	# non-compliant	% non-compliant
Refuge Width	16	64	5	31
Refuge Length	16	64	2	8
Refuge Slope	16	64	3	12
Refuge Cross Slope	16	64	7	28
Gutter Running Slope	16	64	2	13
Gutter Cross Slope	16	64	5	31
Gutter Lip	16	64	0	0
Detectable Warning	16	64	5	31

► ISLAND REFUGE FEATURES

- i. **Island Refuge Width** - *The recommended minimum accessible route width is 60 inches. PROWAG R305.2.4 requires a five foot by five foot space is the minimum required for two persons traveling opposite directions to wait, out of the street, for opportunities to continue crossing the street.*
- ii. **Island Refuge Floor Running Slope** - *The pedestrian access route running slope is the sloped transition between street entry points. Steep grades are difficult for people who use walking aids and manual wheelchairs to negotiate because more energy is needed to begin and to travel on*

sloped surfaces. PROWAG R302.5 specifies that the island refuge running slope should not exceed 5%. Of the 25 islands measured for island refuge running slope, the survey team found that 13 islands met PROWAG standards with running slopes of less than 5%; 3 were non-standard with running slopes greater than 5%.

- iii. **Island Refuge Floor Cross Slope** - *The pedestrian access route within the island refuge area allows people who use wheelchairs and other wheeled devices to negotiate the elevation change along the route without having to negotiate changing slopes. People with mobility impairments*



often have difficulty negotiating a grade and cross slope simultaneously. Since the grade of the ramp will be significant, the cross slope should be minimized. PROWAG R302.6 specifies that island refuge cross slopes should not exceed 2%. Of the 25 islands measured for island refuge cross slope, the survey team found that 9 met PROWAG standards with cross slopes of less than 2% and 7 were non-standard with cross slopes greater than 2%.

- iv. **Island Refuge DWS** - Raised tactile surfaces used as warnings employ textures detectable with the touch of a foot or sweep of a cane to indicate hazards or changes in the pedestrian environment. PROWAG specifies that tactile surfaces used as detectable warnings must also provide color contrast with surrounding surface materials. Detectable warning surfaces are required at both ends of accessible route, within the confines of the island refuge area, when the refuge length exceeds 72 inches. Detectable warning surfaces should not be placed where the refuge length is less than 72 inches.
- v. **Gutter Running Slope** - The slope is measured in the gutter, at the entrance to the island refuge route, parallel to the path of travel. Steep gutter running slopes can make it difficult for a person in a wheelchair to transition between the crosswalk and the island refuge route. PROWAG requires gutter running slope to be no more than 5%. The team found that of the 16 islands measured there were no gutter running slopes no more than 5%.
- vi. **Gutter Running Slope** - The slope is measured in the gutter at the entrance to

the island refuge route, perpendicular to the path of travel. An excessive gutter cross slope can decrease stability for disabled pedestrians. PROWAG requires gutter cross slope to be no more than 2%. The survey team found that 10 islands had standard cross slopes, or 63% of the 16 measured; and 6 (37%) had non-standard gutter cross slopes in excess of 2 percent.

- vii. **Gutter Lip** - The island refuge route crosses the curb area to meet the gutter. PROWAG requires a smooth transition between the gutter and the island refuge route. The survey team found that 11 (69%) of the 16 islands measured had non-standard transitions that are considered tripping hazards.

▶ ISLAND REFUGE BARRIER ANALYSIS RANKING

Although ADA tells us which ramp features are non-standard it does not offer guidance on which non-standard islands should be replaced first. The final stage of the ADA Self-Evaluation Report process was to screen the 25 island locations documented in the field inventory to determine which of these sites required more immediate attention.

Island refuge activity and impedance scores found in the technical appendix report were sorted according to their size and divided into three categories (high/medium/ low) using


natural breaks. The island refuge natural break categories are as follows: (i) activity score (low = 0-25; medium = 26-40; high = 41-100); and, (ii) impedance score (low = 0-22; medium = 23-50; high = 51-100).

As indicated in the table below, of the 25 island locations recorded:

- **4 percent** (the smallest share) had a combined high impedance and high activity score.
- **24 percent** (the largest share) had a combined low impedance and high activity score.

Activity	Impedance	Island Curbcuts	Percent
High	<i>High</i>	1	4
High	<i>Medium</i>	3	12
High	<i>Low</i>	2	8
Medium	<i>High</i>	2	8
Medium	<i>Medium</i>	2	8
Medium	<i>Low</i>	4	16
Low	<i>High</i>	6	24
Low	<i>Medium</i>	0	0
Low	<i>Low</i>	5	20
Total		25	100



Data for the island refuge (island cut-throughs) activity and impedance were layered to derive a composite barrier ranking score for a particular intersection. Reflected in the table below are the final results of the barrier ranking analysis; categorized using natural breaks as follows: low = 0-40; medium = 41-90; high = 91-156. As indicated, 44 percent (the highest share) had a high barrier ranking. 

Barrier Ranking	Island Refuge	Percent
High	11	44%
Medium	8	32%
Low	6	24%
Total	705	100%

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04/ TRANSITION PLAN



(Items have been included for the city's consideration. In essence, the transition plan is an action plan based upon the City's plan, per findings and recommendations.)

TRANSITION PLAN -

The Transition Plan combines the findings of the policy, practice and procedures assessments, with the rights of way inventory assessment and community review to define specific actionable items over time.

▶ OFFICIAL RESPONSIBLE

The Director of the Public Works Department is responsible for implementing the Transition Plan relative to improving ADA compliance for pedestrian access in the public rights of way. The current contact is:

*Insert Person, Title
Address
Phone
Email*

Policies, Practices and Procedures Updates City to insert an actionable items from the polices, practices and procedures findings and recommendations section. Establishing a written and documented grievance procedure or staff training are examples actionable items.

▶ BARRIER REMOVAL PRIORITIZATION

Once each barrier identified was given a barrier ranking score (based on the combined activity and impedance scores), areas requiring improvement were prioritized within high, medium and low categories. Areas identified for improvement were given weighted points as discussed in the self evaluation report. This prioritization process ensures that the most dangerous issues are remedied first.

▶ FUNDING OPPORTUNITIES

As can be seen in the previous sections and in the extensive reports provided in the Appendix, there is a significant need for barrier removal in the City. Normal funding mechanisms may not be able to address all the needs. There are several alternative funding sources that may be available for the City to address these issues, including federal and state funding, local funding, and private funding. The following information details these different funding sources. While these are not assured, and represent competitive grants, many are worth investigating and pursuing. The City intends to pursue any funding sources which may aid in barrier removal and access improvement.

Federal Sources

- *STP - Surface Transportation Program*
- *HSIP - Highway Safety Improvement Program*
- *TE - Transportation Enhancement Activities*
- *FTA - Federal Transit Capital, Urban & Rural Funds*
- *TrE - Transit Enhancements*



- *402 - State and Community Traffic Safety Program*
- *PLA - State/Metropolitan Planning Funds*
- *TCSP - Transportation and Community and System Preservation Program*
- *SRTS - Safe Routes to School*

Local Sources -

There are several options for local funding for the City to consider. They include:

- *Scheduled / Funded CIP projects that are funded through bonds and sales tax.*
- *CDBG – Community Development Block Grants – identified elements in alignment with priorities that have been adopted by the City.*
- *General fund (from sales tax and bond issue)*
- *Allocation of departmental budgets – requests for larger share to address needs in a more timely fashion*
- *Maintenance funds*
- *Special taxing districts*
- *Tax Increment Financing District (TIF) – A TIF allows cities to create special districts and to make public improvements within those districts that will generate private-sector development. During the development period, the tax base is frozen at the predevelopment level. Property taxes continue to be paid, but taxes derived from increases in assessed values (the tax increment) resulting from new development either go into a special fund created to retire bonds issued to originate the development, or leverage future growth in the district.*

- *Sidewalk or Access Improvement Fee*
- *Transportation User Fee*

Private Sources -

Private funding may be available through local or national foundations, endowments, private development or individuals. Corporate sponsorships could also be considered to help address improvements for accessibility.


▶ COST ESTIMATES & IMPLEMENTATION SCHEDULE

It is not financially feasible to immediately remove all barriers to access. The implementation schedules detailed below will be updated annually by (ADA Coord) to account for progress during the year and also to provide for inclusion of new information or ADA complaints.

The City 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 constraints and opportunities. It is the goal of this Transition Plan to provide access to the programs, activities and services provided by the City. Interim measures will be explored and implemented in order to provide programmatic access to the public pending the implementation of physical barrier removal projects. The City has ongoing programs that monitor proposed alteration projects and since 2009 all City of Clayton PW resurfacing projects have included the review and upgrades of curb ramps to PROWAG standards.

04/ TRANSITION PLAN

The following chart details the estimated citywide costs for addressing improvements, the proposed schedule in years, and the approximate yearly funding needed. Implementation schedules

for sidewalks, signals, curb ramps, accessible parking, and street furniture can be found in the Appendices. 

Cost Estimate Allocation by Barrier Rank per Feature

Facility Type	Barrier Rank High - Estimate	Barrier Rank Mid - Estimate	Barrier Rank Low - Estimate	Total Cost all Barrier - Estimate	Schedule Implement (years)	Approx. Annual Budget
Sidewalks	\$	\$	\$	\$		\$
Signalized Intersections	\$	\$	\$	\$		\$
Un-Signalized Intersections	\$	\$	\$			\$
Accessible Parking	\$	\$	\$	\$		\$
Street Furniture	\$	\$	\$	\$		\$
Total	\$	\$	\$	\$		\$



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05/ APPENDIX



DEFINITIONS

Following is a summary of many definitions found in 2010 ADA Standards for Accessible Design. Please refer to the Americans with Disabilities Act of 1990, the Title II Technical Assistance Manual, and the 2010 ADA Standards for Accessible Design as amended through September 2002 for the full text of definitions and explanations.

Accessible Route

An accessible route is a continuous unobstructed path that connects all accessible elements and spaces of a building or facility and that complies with Chapter 4 of ADAAG. Interior accessible routes may include corridors, floors, ramps, elevators, lifts, and clear floor space at fixtures. Exterior accessible routes may include parking access aisles, curb ramps, crosswalks at vehicular ways, walks, ramps, and lifts.

Auxiliary Aids and Services

The term auxiliary aids and services includes:

- *Qualified interpreters or other effective methods of making orally delivered materials available to individuals with hearing impairments;*
- *Qualified readers, taped texts, or other effective methods of making visually delivered materials available to individuals with visual impairments;*
- *Acquisition or modification of equipment or devices; and*
- *Other similar services and actions.*

Complaint

A complaint is a claimed violation of the ADA.

Curb Ramp

A curb ramp is a short ramp cutting through a curb or built up to it.

Detectable Warning

Detectable warnings are standardized surface features built in or applied to walking surfaces or other elements to warn individuals with visual impairments of hazards on a circulation path.

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 such impairment.*

A. 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.

B. 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.

Discrimination on the Basis of Disability

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 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;*
- *Fail to make reasonable modifications to accommodate 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 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.*

HIV

The infectious agent known as Human Immune Virus, Human Immunodeficiency Virus, HTLVIII, LAC, or AIDS virus.

A. HIV Condition

AIDS, ARC, or HIV Infection.

Physical or Mental Impairments

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 abuse if the drug user 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; transexualism; current 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 that are not symptoms of a mental or physiological disorder.

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.

Marked Crossing

A marked crossing is a crosswalk or other identified path intended for pedestrian use in crossing a vehicular way.

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. This standard, known as program accessibility, applies to all existing City facilities.

Reasonable Modification

If individuals' disabilities prevent them from performing the essential functions of the program or activity, it is necessary to determine whether reasonable modification would enable these individuals to perform the essential functions of the program or activity.

Reasonable modification is any change in program or activity or in the way things are customarily done that enables an individual with a disability to enjoy equal program opportunities. Modifications may mean adjustments:

- *To a registration or application process to enable an individual with a disability to be considered for the program or activity; and*
- *That enable individuals with disabilities to enjoy equally the benefits of the program or activity as other similarly situated individuals without disabilities enjoy.*

Modification includes making existing facilities and equipment used by individuals readily accessible and usable by individuals with disabilities.



Modification applies to:

- *All decisions and to the application or registration process;*
- *All services provided in connection with the program or activity; and*
- *Known disabilities only.*

Modification is not required if:

- *It changes the essential nature of a program or activity;*
- *It creates a hazardous situation; or*
- *It poses an undue burden.*

Service Animal

The ADA defines a service animal as any guide dog, signal dog, or other animal individually trained to provide assistance to an individual with a disability. If they meet this definition, animals are considered service animals under the ADA regardless of whether they have been licensed or certified by a state or local government. Service animals perform some of the functions and tasks that the individual with a disability cannot perform for him or herself. Some of the typical uses of service animals are:

- *Guiding persons with visual impairments;*
- *Alerting persons with hearing impairments to sounds;*
- *Pulling wheelchairs or carrying and picking up things for persons with mobility impairments; or*
- *Assisting persons with mobility impairments to maintain their balance. Although a number of states have programs to certify service animals, agencies or businesses may not insist on proof of state certification before permitting the service animal to accompany the person with a disability.*

Substantial Limitation of Major Life Activities

An individual is disabled if she or he has a physical or mental impairment that:

- *Renders her or him unable to perform a major life activity, or*
- *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 a 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*

▶ ADA GRIEVANCE FORM

CITY OF CLAYTON, MISSOURI

Title II of the Americans with Disabilities Act Section 504 of the Rehabilitation Act of 1973 Discrimination Complaint Form

Instructions: Please fill out this form completely, in black ink or type. Sign and return to the address on page 3.

Complainant: _____ Address:
_____ City, State and Zip

Code: _____ Telephone: Home:
_____ Business/Other: _____ Person Discriminated Against:

(if other than the complainant) Address:
_____ City, State, and Zip

Code: _____ Telephone: Home:
_____ Business/Other: _____ Government, or organization, or

institution which you believe has discriminated: Name:
_____ Address:
_____ County:
_____ City:
_____ State and Zip Code:

_____ Telephone Number:



Discrimination Complaint Form

When did the discrimination occur? Date: _____

Describe the acts of discrimination providing the name(s) where possible of the individuals who discriminated (use space on page 3 if necessary):

Have efforts been made to resolve this complaint through the internal grievance procedure of the government, organization, or institution? Yes _____ No _____ If yes: what is the status of the grievance?

Has the complaint been filed with another bureau of the Department of Justice or any other Federal, State, or local civil rights agency or court? Yes _____ No _____ If yes: Agency or Court:

_____ Contact Person:

_____ Address:

_____ City, State, and Zip

Code: _____ Telephone Number:

Date Filed: _____

Discrimination Complaint Form

Do you intend to file with another agency or court? Yes _____ No _____ Agency or Court:

_____ Address:

_____ City, State and Zip

Code: _____ Telephone Number:

_____ Additional space for answers:

Signature: _____ Date:

Return to:

City of Clayton, ADA Coordinator 10 Bemiston, Ave.,
Clayton, MO 63105



PUBLIC HEARING/OPEN HOUSE- March 13th, 2014, 4-7pm, the City of Clayton will hold a public meeting discussing the City's Draft ADA Transition Plan for Public Rights of Way in the Council Chambers, Room 201 of City Hall.

The City has developed a Transition Plan under the Americans with Disabilities Act (ADA) for Pedestrian Facilities in the Public Right of Way. The Plan describes how the City intends to remove barriers for disabled persons who enter or who are in the public right of way. As the City of Clayton works to ensure that programs and services within the public right of way are accessible to individuals with disabilities, residents are encouraged to participate and offer feedback. This Transition Plan focuses and describes the needs within the community for curb ramps, pedestrian signals, sidewalks and other pedestrian facilities, as well as a process to implement improvements over time in order to comply with the law. The draft ADA Transition Plan is intended to identify needs and plan improvements, creating safe and usable pedestrian facilities for each and every member within the community, and assuring compliance with all federal, state, and local regulations and standards.

The public is invited to attend the meeting. There will be a brief project presentation at 4:45pm and again at 6pm. Before and after each presentation, the meeting will be conducted in an open-house format to increase the opportunity for public comment and to allow one-on-one discussion with project team members. Comments can be submitted for the public record in writing at the meeting. The City will also provide assistance for individuals to record their verbal comments during the meeting. In addition, written or e-mailed comments will be accepted through 5pm March 31, 2014. The draft plan is available in alternate formats, such as Braille and audio recordings, at no charge. To request an alternate format, please contact the project manager listed below.

Comments and questions should be directed to the project manager: Steve Meyer, P.E., City of Clayton, Public Works Department, 10 North Bemiston Avenue, Clayton, MO 63105. Comments may also be submitted via email to smeyer@claytonmo.gov.

Please note: Reasonable efforts will be made to assist and accommodate disabled persons desiring to attend the meeting. Requests for auxiliary aids or services to assist individuals with disabilities or limited English proficiency should be made to City Clerk at 290.8469 or Relay Missouri at 1.800.735.2966 (TDD) at least two working days prior to the meeting.

▶ ADA GRIEVANCE PROCEDURE

Purpose of Guidelines:

These guidelines are intended to ensure that discrimination complaints are handled promptly, effectively and equitably.

Overview of Grievance Procedure:

1. A written grievance should be filed with the City of Clayton, using the City's ADA Grievance Form. The ADA Grievance Form can be found at www.claytonmo.gov/. If the grievance is not filed on the City of Clayton ADA Grievance Form, it should nonetheless contain the following information:

- *The name, address, and telephone number of the person alleging the ADA violation, if other than the person filing the complaint.*
- *A description of the alleged violation and the remedy sought. Information regarding whether a grievance has been filed with the Department of Justice or other agency. If a grievance has been filed, the name of the agency or court where the complaint was filed, the date the grievance was filed, and the name, address and telephone number of a contact person with the agency with which the complaint was filed.*

2. An oral grievance can be filed by contacting the Lead ADA Coordinator. The oral grievance will be documented in writing by the ADA Coordinator utilizing the ADA Grievance Form and will be signed by the complainant.


3. The grievance will be responded to within 20 working days of receipt of grievance from complainant.

4. Within 60 calendar days of receipt, the ADA Coordinator will forward the grievance to Compliance Investigations who will conduct the investigation necessary to determine the validity of the alleged violation. If appropriate, the ADA Coordinator and/or Compliance Investigator will arrange to meet with the complainant to discuss the matter and attempt to reach, or mediate a resolution of the grievance.

5. If an informal resolution and mediation of the grievance is not reached, a written determination as to the validity of the complaint and description of the resolution, if appropriate, shall be issued by the City of Clayton's City Manager and a copy forwarded to the complainant no later than 90 days from the date of the City's receipt of the complaint.

6. The complainant may request reconsideration if he/she is dissatisfied with the written determination. The request for reconsideration shall be in writing and filed with the City of Clayton, Human Rights Department, 10 N. Bemiston Ave., Clayton, MO, 63105 within 30 days after the City Manager's determination has been mailed to the complainant. The City of Clayton's City Attorney shall review the request for reconsideration and make a final determination within 90 days from the filing of the request for reconsideration.

7. If the complainant is dissatisfied with City's handling of the grievance at any stage of the process or does not wish to file a grievance by utilizing the City's ADA Grievance Procedure, the complainant may file a grievance directly with the United States Department of Justice or other appropriate state or federal agency. Use of the City's grievance procedure is not a prerequisite to the pursuit of other remedies.

The resolution of any specific complaint will require consideration of varying circumstances, such as, the specific nature of the disability, the nature of the access to services, programs, or facilities at issue and the essential eligibility requirements for participation. Also, areas to consider would be the health and safety of others, the degree to which an accommodation would constitute a fundamental alteration to the program, service, or facility, or cause an undue hardship to the City. Accordingly, the resolution by the City of any one grievance does not constitute a precedent upon which the City is bound or upon which other complaining parties may rely. 



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INTRODUCTION

Thank you for participating in this Americans with Disabilities Act (ADA) self-evaluation for the City of Clayton Public Works Department. Completion of this survey is an important step in establishing an accessible community that enables the public, including people with disabilities, improved access to the City of Clayton's services, programs, and activities.

Please keep in mind that the self evaluation survey is not a test. The survey is a tool that is being used to gather baseline data about the accessibility of city services, programs, and activities. We hope to identify best practices as well as areas where improvement is needed.

The City of Clayton will use the data gathered to determine where resources and training are needed to improve access across all programs. Please make ample use of the space provided on many of the survey questions to supplement your answer with specific examples and/or additional comments.

If you have any questions about the survey, please call Mike Vonderheide of Cole & Associates at _____.

1. Name of person completing this survey:

Name:

Title:

Phone:

Email:

ADA SELF-EVALUATION

2. Has the City of Clayton Public Works Department published a public notice that it is preparing an ADA Self-Evaluation of its programs and inviting public comment?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

3. Has the City of Clayton Public Works Department provided interested persons, including individuals with disabilities, an opportunity to participate in the ADA Self-Evaluation process by submitting comments and making specific recommendations?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

4. Does the City of Clayton Public Works Department website include information on the status of the current ADA Self-Evaluation and Transition Plan process?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

PUBLIC RIGHT-OF-WAY

5. Has the City of Clayton Public Works Department designated at least one responsible employee to bring all department programs, policies/procedures, maintenance practices, and infrastructure into compliance with ADA Standards?

- Yes
- No
- Don't Know

If yes, please identify the Public Works Department designee(s):

6. Does the the City of Clayton have policies and procedures ensuring that ADA-compliant curb ramps will be provided at any intersection having curbs or other barriers to entry from a sidewalk whenever a street or road is constructed or altered? (For purposes of answering this question, alteration includes paving, repaving, and resurfacing but does not include normal maintenance, such as filling potholes.)

- Yes
- No
- Don't Know

If yes, (please specify which policies and procedures)

7. Does the City of Clayton Public Works Department have policies or procedures for soliciting and receiving input from people with disabilities to its plans for the construction and alteration of sidewalks, curb ramps, and pedestrian crossings?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

8. Does the City of Clayton Public Works Department operate programs devoted to making sidewalks and curb ramps more accessible, including annual installation, repair and maintenance programs, and pedestrian-related capital projects?

- Yes
- No

If yes, please identify the programs:

9. Where it is technically infeasible to fully comply with ADA accessibility guidelines, does the City of Clayton Public Works Department have policies and procedures in place (e.g., design exception form) to document its efforts to make every effort to provide modifications that would improve the existing conditions to facilitate access to the maximum extent feasible before proceeding with the project?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

10. Has the City of Clayton adopted a snow removal policy or ordinance and does the Public Works Department assume responsibility for communicating requirements, inspecting conditions, addressing complaints, and ultimately enforcing regulations?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

11. Does the City of Clayton Public Works Department have procedures for accommodating people with disabilities in work zones for construction and maintenance projects?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

ON-GOING ACCESSIBILITY IMPROVEMENT

12. Does the City of Clayton Public Works Department consult or work with any outside organizations that assist people with disabilities?

- Yes
- No
- Don't Know

If yes, please provide a list of organizations:

13. Does the City of Clayton Public Works Department have a process for determining whether a policy or practice modification would fundamentally alter the nature of the program you offer?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

14. Would the implementation of any measure to improve accessibility for people with disabilities to your programs pose an undue financial or administrative burden?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

15. Does the City of Clayton Public Works Department have a process for responding to requests for modifications that would allow people with disabilities to participate in your programs?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

16. Has the City of Clayton Public Works Department had requests for improving accessibility to department programs or facilities?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

ON-GOING ACCESSIBILITY IMPROVEMENT

17. Does the City of Clayton Public Works Department document the resolution of accessibility requests and complaints in an annual report?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

ADA COORDINATOR

18. Does the City of Clayton have a citywide ADA Coordinator?

- Yes
- No
- Don't Know

If yes, please identify the ADA Coordinator:

ADA COORDINATOR

19. Does the citywide ADA Coordinator have the time and expertise (training in effective communication, accessibility of electronic information and services, accessible meetings, reasonable modifications or accommodations for the public and employees, etc.) necessary to coordinate the City of Clayton's efforts to comply with and carry out its responsibilities under the ADA?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

20. Does the citywide ADA Coordinator actually carry out these duties?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

21. Does your citywide ADA Coordinator review policies, procedures, and practices for potential impacts on disability issues and standards?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

22. Does the citywide ADA Coordinator investigate all complaints communicated to the City of Clayton alleging that it does not comply with the ADA?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

23. Does the City of Clayton make available to all interested people the name, office address, and telephone number of the citywide ADA Coordinator?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

PUBLIC NOTICE

24. Does the City of Clayton use the Department of Justice's model "Notice Under the Americans with Disabilities Act" or a similarly comprehensive notice to the public of their right to participate in any service, program, or activity operated or contracted for by the city regardless of their disability?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

25. Are the City of Clayton's public notices available in alternate formats – i.e., large print, Braille, audio format, accessible electronic format (e.g., via email, in HTML format on the City of Clayton's website)?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

26. Do the City of Clayton's written materials (publications) include a notice of nondiscrimination?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

27. When hosting public meetings and hearings, does the City of Clayton notify all persons that these events will be held in accessible locations and that auxiliary aids will be provided, upon request, to participants with disabilities?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

GRIEVANCE PROCEDURES

28. Does the City of Clayton use the Department of Justice's model "Grievance Procedure under the Americans with Disabilities Act" or a similarly comprehensive grievance procedure (i.e., a grievance procedure for complaints made by any member of the public under the ADA related to any program, service, or activity)?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

GRIEVANCE PROCEDURES

29. Is the grievance procedure available in alternate formats?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

INTERPRETERS

30. Does the City of Clayton Public Works Department have a policy and procedures in place to deal with requests from the general public for sign language, oral, and cued speech interpreters?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

INTERPRETERS

31. Do the City of Clayton's policies and procedures specify that sign language, oral, and cued speech interpreters can be obtained within a short period of time when necessary?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

32. Do the City of Clayton's policies and procedures make clear that it is generally inappropriate to request family members and companions of deaf persons to serve as sign language interpreters?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

33. Do the City of Clayton's policies and procedures specify that deaf persons requesting interpreters should not be charged for the cost of the interpreter?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

34. Do the City of Clayton's policies and procedures specify that the City's decision to deny an interpreter based on undue financial and administrative burden must be made after considering all resources available for use in funding the operation of the program and must be accompanied by a written statement of the reasons for reaching the conclusion?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

City of Clayton

35. Do the City of Clayton's policies and procedures specify that, in any instance where the provision of an interpreter would result in an undue financial and administrative burden, the entity will take any other action that would not result in an undue financial and administrative burden but would nevertheless ensure that the individual with a disability receives the benefits or services provided?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

INTERPRETERS

36. Have the City of Clayton Public Works Department employees who interact with the public been trained on the correct procedures to follow when a person requests an interpreter?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

37. Does the City of Clayton have employees on staff who are qualified interpreters or have arrangements with one or more vendors to provide interpreting services when needed?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

WEBPAGE

38. Does the City of Clayton website include an accessibility statement?

- Yes
- No
- Don't Know

39. Does the City of Clayton Public Works Department website include any information about the programs it offers?

- Yes
- No

Please supplement your answer with specific examples and/or additional comments:

40. Does the City of Clayton's Public Works Department website include information about the accessibility of facilities where programs or services are offered?

- Yes
- No

Please supplement your answer with specific examples and/or additional comments:

41. Does the City of Clayton Public Works Department provide documents on its website for downloading by the public?

- Yes
- No

If yes, do the documents meet federal accessibility standards for electronic and information technology?

42. How does the City of Clayton Public Works Department ensure that its website is usable by individuals with disabilities?

43. Does the City of Clayton webpage provide links to federal, state, and local agencies that will provide a variety of information about the Americans with Disabilities Act?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

OTHER AUXILIARY AIDS AND SERVICES

44. Does the City of Clayton have policies and procedures in place to deal with requests from the general public for documents in Braille, large print, audio recording, and accessible electronic format (that is, an email or compact disc containing the document in plain text, word processing format, HTML or some other format that can be accessed with screen reader software)?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

45. Does the City of Clayton have policies and procedures in place to deal with requests from the general public for notetakers, computer-assisted real-time transcription services, and other auxiliary aids and services for providing effective communication?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

46. Does the City of Clayton have the equipment or arrangements with vendors so it can provide written materials in alternative formats (e.g., Braille, large print, audio format, electronic format)?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

47. Does the City of Clayton provide written materials in alternative formats when asked to do so? (For example, does the City communicate with blind people by using Braille, large print, or email when asked to do so?)

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

48. Does the City of Clayton give primary consideration to the requests of the person with a disability when determining what type of auxiliary aid or service to provide?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

ACCESSIBLE/ADAPTIVE EQUIPMENT

49. Do you allow the public to use electronic equipment—including copying machines, personal computers, microfilm readers, etc.—in your programs

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

ACCESSIBLE/ADAPTIVE EQUIPMENT

50. How do you ensure that electronic equipment is accessible to and usable by individuals with disabilities?

TELEVISED AND AUDIOVISUAL PUBLIC INFORMATION

51. Does the City of Clayton Public Works Department prepare audiovisual or televised presentations for the public or make audiovisual presentations to the public?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

TELEVISED AND AUDIOVISUAL PUBLIC INFORMATION

52. How do you make audiovisual or televised presentations prepared or presented by your department to the public accessible to individuals with disabilities?

TTYs

53. Where telephones are available to the public for making outgoing calls, are TTYs available for people with hearing and speech disabilities?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

54. Does the City of Clayton handle calls placed using a Telecommunications Relay Service or a Video Relay Service in the same way as other telephone calls?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

TRANSPORTATION SERVICES

55. Does the City of Clayton Public Works Department provide transportation to volunteers, program participants, visitors, etc.?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

TRANSPORTATION SERVICES

56. What procedures does your department follow to make transportation accessible to persons who have:

Visual disabilities?	<input type="text"/>
Hearing disabilities?	<input type="text"/>
Mobility disabilities?	<input type="text"/>

USE OF CONSULTANTS

57. How do you ensure that the consultants you hire to support your programs are aware of their obligations to facilitate participation of individuals with disabilities in programs or activities operated on behalf of your department?

58. How do you monitor your consultants to ensure they fulfill this obligation?

EMERGENCY EVACUATION PROCEDURES

59. What equipment and/or procedures do you use to notify individuals with disabilities of emergencies and evacuation procedures? List equipment and/or procedures specific to individuals with:

Visual disabilities:

Hearing disabilities:

Learning disabilities:

60. Does the facility you operate your programs in have an evacuation plan?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

EVENTS ON PUBLIC PROPERTIES

61. Does the City of Clayton Public Works Department organize special events or do you help facilitate private events on public property?

- Yes
- No

Please supplement your answer with specific examples and/or additional comments:

EVENTS ON PUBLIC PROPERTIES

62. If yes, please describe briefly the type of event and what types of outside organizations are involved?

63. How do you ensure that both private entities and your staff are aware of their obligations to facilitate participation of individuals with disabilities in these special events or private events held on public properties?

ADA TRAINING PROGRAM

64. Does anyone on your staff have experience working with people with disabilities?

- Yes
- No
- Don't Know

Please supplement your answer with specific examples and/or additional comments:

65. What staff members have contact with the public and need to be aware of the Public Works Department obligations and policies that enable persons with disabilities to participate in department programs or activities?

66. How have you informed/trained these staff members regarding the provision of appropriate modifications for people with disabilities?

67. How often is training provided on disability issues in the City of Clayton Public Works Department?

- More than once per month
- Monthly
- Twice per year
- Annually
- Less than annually
- Unsure
- Never

Follow-up (please specify topics and length of training)

68. Please respond to the following statements.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
Additional resources are needed for ADA work	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Centralized resources are vital for compliance (such as forms, expertise, private consultation)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I need more ADA training	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
My organization has a lot to catch up on	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other (please specify)

PROMISING PRACTICES

69. Identify at least three promising practices that the City of Clayton Public Works Department has implemented to improve access for people with disabilities during the past two fiscal years.

70. How would you like to receive more information on promising practices that help address the needs of people with disabilities in your organization?

ADA Conference

Webinar

Newsletter

In person training

Other (please specify)