

# ADA Transition Plan



**COLORADO**  
Department of  
Transportation

Civil Rights & Business Resource Center

October 2022

---



## Table of Contents

	Page
1.0 Introduction .....	1
1.1 Official Responsible .....	1
2.0 Program Background .....	3
2.1 Accessibility Across CDOT Programs .....	6
2.2 Communications .....	6
2.2.1 Online Content .....	6
3.0 Federal Requirements for Transition Plan .....	7
3.1 Rehabilitation Act of 1973.....	7
3.2 Code of Federal Regulations .....	7
4.0 CDOT Policies .....	9
4.1 Local Agencies .....	10
5.0 CDOT Standards.....	10
5.1 PROWAG Functional Accessibility .....	10
5.2 Design and Construction Standards .....	11
5.3 Variances .....	12
5.4 Right-of-Way .....	12
5.5 Historic Properties.....	14
6.0 Curb Ramp Program.....	15
6.1 2017-2020.....	15
6.2 2020-2022.....	16
6.3 2022 Forward.....	19
6.4 Training .....	20
6.4.1 Measuring Guidelines .....	20
6.4.2 Survey123.....	20
7.0 ADA Title II Complaint Procedure .....	21
7.1 Who May File a Complaint.....	21
7.2 How to File a Complaint .....	21
7.3 Conducting an Investigation.....	22
7.4 Record Retention .....	22
8.0 Statewide Inventories (Plan to Identify Barriers or How Barriers Are Identified).....	22



8.1	Curb Ramps Inventory.....	23
8.2	Pedestrian Push Buttons (PPB) and Signals Inventory .....	24
8.3	Buildings/Facilities with Public Access .....	24
8.3.1	CDOT Offices and Other Facilities .....	25
8.3.2	Rest Areas .....	26
8.4	Bustang Family of Services .....	28
8.4.1	Service Stops.....	28
8.4.2	Parking Areas .....	29
8.4.3	Ridership Services.....	29
9.0	Schedule for Curb Ramps and Pedestrian Push Buttons .....	29
9.1	Planned .....	29
9.2	Public Requests .....	31
9.2.1	Pedestrian Push Buttons.....	31
9.2.2	Curb Ramp Intake Form .....	32
10.0	Schedule for Buildings/Facilities with Public Access.....	32
10.1	CDOT Offices and Other Facilities.....	32
10.2	Rest Areas .....	32
11.0	Schedule for Bustang Family of Services.....	34
12.0	Input to 2022 ADA Transition Plan Update.....	34
12.1	Internal CDOT Groups .....	34
12.2	External Stakeholders.....	34
12.2.1	Stakeholder Meetings .....	35
12.2.2	Digital Questionnaire .....	37
12.3	Public Meeting .....	38
13.0	Ongoing Informational Outreach .....	40
13.1	Partner Agencies.....	40
13.2	Accessibility Program Website.....	40
13.3	Project Design.....	41
14.0	Conclusion .....	42



**Appendices**

- Appendix A. Federal Code of Regulations
- Appendix B. ADA Design Requirements and Guidance
- Appendix C. Survey123 Data Collection Flowcharts
- Appendix D. Stakeholder Contact List

**Figures**

Figure 1. CRBRC’s Reporting Structure within CDOT’s Organization ..... 2

Figure 2. ADA Steering Committee ..... 3

Figure 3. CDOT’s ADA Timeline ..... 5

Figure 4. CDOT Regions and Percentage of Curb Ramps ..... 15

Figure 5. Survey123 Screen Shot ..... 21

Figure 6. CDOT Offices and Buildings ..... 25

Figure 7. Post on CDOT’s Facebook Page Advertising the Public Meeting ..... 38

Figure 8. Microvideo Screenshots ..... 39

Figure 9. Curb Ramp Database Screenshot..... 41

**Tables**

Table 1. Cost and Time Impacts Based on Right-of-Way Ownership ..... 14

Table 2. Projects Completed by Region 2020 to 2022..... 17

Table 3. Letter Grades for Buildings..... 26

Table 4. Planned Projects by Region 2022 to 2024..... 30

Table 5. Rest Area Tiers ..... 33



## 1.0 Introduction

This document is an update to the 2017 ADA Transition Plan. The 2022 ADA Transition Plan describes and evaluates CDOT’s policies, procedures, and practices for implementing accessible improvements within the public right-of-way throughout Colorado. The 2022 ADA Transition Plan (“Transition Plan”) highlights progress made since 2017, as well as efforts in other CDOT program areas, and outlines how CDOT will continue to monitor progress in its Accessibility Program going forward. The plan is a living document with regular updates.

The 2022 ADA Transition Plan covers the following CDOT-owned assets:

- Curb ramps
- Pedestrian push buttons
- Buildings and facilities with public access, including rest areas
- Bustang family of services stops, parking areas, and ridership services

Pedestrian facilities (i.e., sidewalks) per Colorado Revised Statute (C.R.S.) 43-2-135 (<https://codes.findlaw.com/co/title-43-transportation/co-rev-st-sect-43-2-135.html>), are the responsibility of local cities and counties.

### 1.1 Official Responsible

The Colorado Department of Transportation (CDOT) Civil Rights & Business Resource Center (CRBRC) prepared this Transition Plan in conjunction with an internal ADA Steering Committee representing impacted and relevant divisions. The CRBRC is the lead on implementing accessible programs, activities, and services related to CDOT facilities.

The Official Responsible for the implementation of the Transition Plan is:

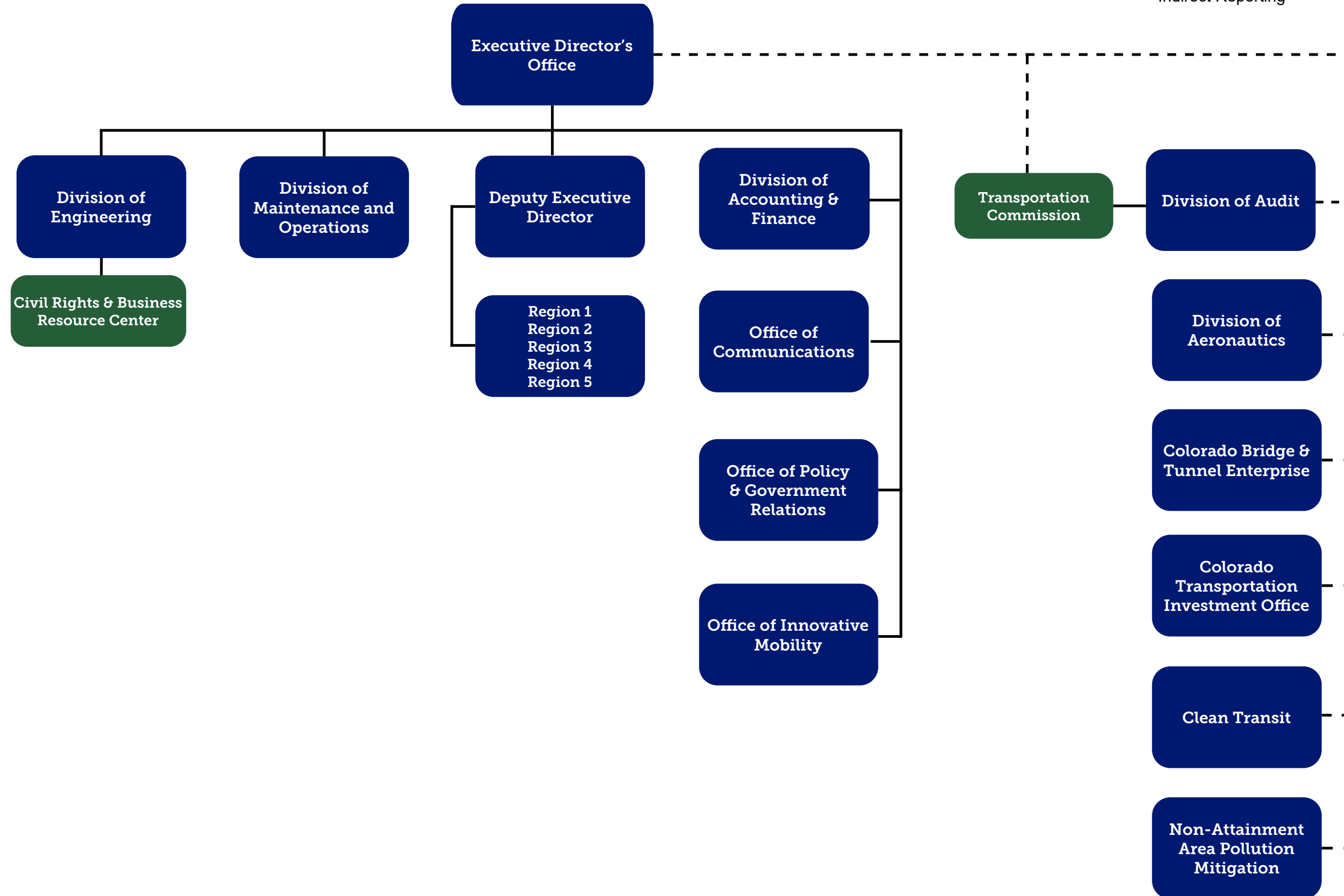
Greg Diehl, Civil Rights Program Director  
2829 W. Howard Pl., Denver, CO 80204  
(303) 757-9599 | [greg.diehl@state.co.us](mailto:greg.diehl@state.co.us)

Figure 1 depicts the CRBRC reporting structure within CDOT’s organization.



Figure 1. CRBRC's Reporting Structure within CDOT's Organization

Legend:  
Direct Reporting ———  
Indirect Reporting - - -





The CRBRC is the primary point of contact for the Transition Plan and exercises oversight of matters related to ADA Title II for CDOT. The CRBRC collaborates with the Office of Policy and Government Relations and the State Office of the Attorney General on the technical interpretation of federal regulations and guidance concerning transportation facilities and buildings; and coordinates with the Standards and Specifications Unit, Project Development Branch to ensure field practices conform to relevant standards. The CRBRC’s ADA Title II Data Specialist and ADA Title II Program Manager are expert resources for guidance on accessibility concerns related to transportation facilities. Contact information for members of CDOT’s ADA Accessibility Program team can be found on CDOT’s website:

<https://www.codot.gov/business/civilrights/about>

CDOT has an ADA Steering Committee to assist with the implementation of the ADA Curb Ramp Program (Figure 2). This chart outlines the structure of the committee and identifies the ADA Region Representatives who are the main points of contact in each CDOT Region for program development and implementation.

Figure 2. ADA Steering Committee



## 2.0 Program Background

CDOT’s vision is to consider accessibility features in the design and construction of all its projects, focusing on implementing compliance, continuity, and consistency while using taxpayer dollars wisely and judiciously. CDOT strives to enhance quality of life for all persons regardless of abilities by creating an integrated transportation system



that focuses on safely moving people with disabilities via accessible linkages among modal choices.

The Americans with Disabilities Act of 1990 and the Rehabilitation Act of 1973 prohibit a public entity from discriminating against qualified persons with disabilities in providing access to facilities and services the public entity provides. This Transition Plan is an operational document to fulfill the requirements of Section 504 of the Rehabilitation Act and Title II of the Americans with Disabilities Act and its corresponding 2008 Amendment Act; and it is an informational document for state and local partners, citizens of Colorado, and those who travel through Colorado with special accommodation needs.

For CDOT and organizations that receive funds from CDOT, the policies, procedures, and practices considered in this plan are those related to the planning, design, construction, maintenance, and operation of transportation systems. Those systems may include public buildings, meeting rooms provided by vendors, roadways, contiguous walkways, intersections, rest areas, roadside emergency telephones, public conveyances such as buses or other passenger vehicles operated by agencies under contracts with CDOT, and related literature and communications pertaining to any of these systems.

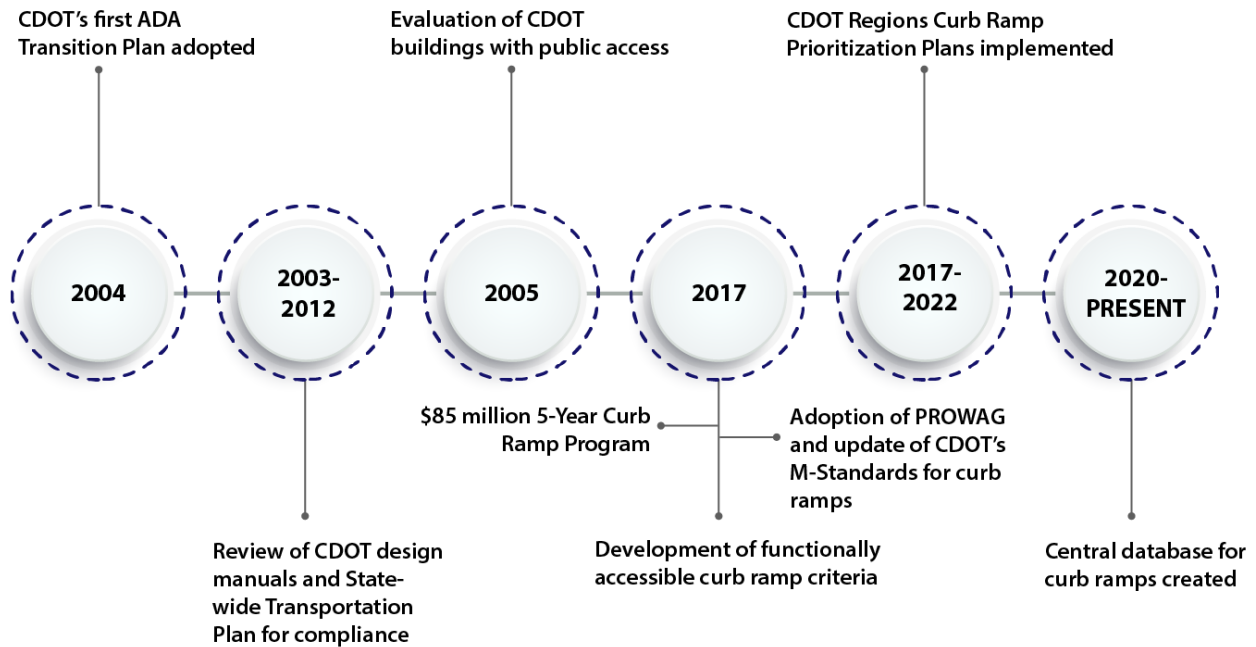
CDOT formalized its approach to actively addressing ADA accessibility concerns in 2003 when its first ADA Transition Plan and Design Bulletin regarding curb ramps and detectable warnings were developed. That ADA Transition Plan was adopted in 2004, and CDOT provided comprehensive training sessions for engineers, consultants, and local agency staff regarding the implementation of the guidelines in the 2003 Design Bulletin. At that time, CDOT also assessed and improved consulting agreements and Intergovernmental Agreement templates to highlight accessibility requirements and include direction for consultants and local agencies regarding relevant policies and procedures. A timeline for CDOT's ADA progress from 2004 to present is shown in Figure 3.

Between 2003 and 2012, CDOT undertook a number of strategic improvement efforts to further advance ADA compliance across CDOT, spending more than \$5 million on curb ramp installation and upgrades throughout the state. The CRBRC Accessibility Program team reviewed the Statewide Transportation Plan, CDOT manuals, and the Roadway Design Guide for ADA compliance and recommended changes to bring those documents into compliance. In 2005, an external consultant evaluated all CDOT buildings that receive public traffic, and the CRBRC corrected deficiencies or moved staff to other ADA-compliant buildings.





Figure 3. CDOT’s ADA Timeline



The CRBRC reviewed CDOT and other DOT procedures to identify best practices for improving accessibility during the construction process. Based on these best practices, CRBRC staff developed inter-programmatic relationships to bring Title II compliance experts into accessibility decisions; educated design, construction, and traffic engineers about accessibility barriers and solutions; and evaluated local agency compliance on CDOT-funded projects.

Since 2003, CDOT has installed and updated curb ramps and added detectible warnings on all programmed projects where required. The CRBRC has assessed and made corrections to projects for ADA compliance as they were designed and built, as well as provided ongoing analysis of accessibility features on state highways and interstates.

In 2017, CDOT began the implementation of an \$85 million, 5-Year Curb Ramp Program to upgrade curb ramps and address deficiencies on more than 20,000 curb ramps statewide taking a “worst first” approach. The program resulted in a comprehensive statewide inventory of curb ramps and upgrades to curb ramps that were not already included in programmed projects. As a result of this inventory, the Transportation Commission of Colorado approved dedicated funding to focus on achieving full curb ramp accessibility on state highways throughout Colorado. With a comprehensive database of curb ramps in place, CDOT has the information it needs to



maximize available funding to continue correcting deficiencies and achieve its goal of full ADA compliance.

## **2.1 Accessibility Across CDOT Programs**

CDOT strives to establish a holistic approach to ADA compliance through inventorying and addressing accessibility deficiencies, and working with other CDOT divisions and departments to update design guidance and standards. For example, CDOT’s design guidance for bike and pedestrian facilities is being updated to incorporate accessibility requirements. CRBRC is also working with an asset manager to align its budget with other CDOT asset categories.

The CRBRC coordinates with other CDOT departments to enhance their approach to making ADA compliance a key priority, extending the agency’s commitment to addressing accessibility throughout. For example, the Property Management Office has incorporated ADA components in their annual inspections of CDOT public buildings and rest areas (Section 8.3.2). The Division of Transit and Rail is implementing processes to inventory bus stops for its interregional express bus services and creating a plan to address deficiencies (Section 8.4).

## **2.2 Communications**

CDOT makes a concerted effort to make information about its programs and projects accessible to the public. These methods include but are not limited to:

- Print Collateral (posters, brochures, flyers, etc.) - Spanish translations, braille, and large print are available upon request.
- Digital Communications (codot.gov, cotrip.org, Google Sites, applications, social media, online surveys and forms, etc.) - Spanish translations provided for key content; additional translations are provided upon request.
- Meetings & Events (forums, training, information sessions) - Spanish translation available upon request, additional languages to extent feasible; ASL Interpreters is available upon request; all facilities accessible to the traveling public.

### **2.2.1 Online Content**

In July 2021, the State Colorado Legislature passed House Bill 21-1110, which requires state and local government entities to comply with the Governor’s Office of Information Technology (OIT) Accessibility Standards by July 1, 2024 (<https://oit.colorado.gov/accessibility-law>). Under the law, all Colorado state



agencies must be compliant when creating and publishing any online content and materials, or must provide reasonable accommodations for people with disabilities. CDOT is currently collaborating with OIT to establish a written plan as well as evaluate potential budget impacts and/or needs.

In accordance with the ADA and implementing regulations §24-85-101 through 104, C.R.S., CDOT has assessed its information technology system(s) and is able to provide effective access to blind and visually impaired persons.

## **3.0 Federal Requirements for Transition Plan**

### **3.1 Rehabilitation Act of 1973**

The Rehabilitation Act of 1973, Sec. 504, 29 U.S.C. § 794 (2006); § 504 (as amended) provides that no person shall be excluded from participation in or be denied the benefits of any program or activity that receives or benefits from federal financial assistance. The specific federal regulation for implementation of Section 504 of the Rehabilitation Act by state transportation agencies such as CDOT is 49 CFR Part 27. Section 27.9 specifies that as a condition of receiving federal financial assistance, CDOT must assure its federal funding sources that it shall operate all of its programs in accordance with the provisions of 49 CFR Part 27, Subpart A. This Subpart prohibits discrimination against persons with disabilities.

The requirements of the Rehabilitation Act apply not only to programs, activities, and services provided and controlled directly by CDOT, but also to programs, activities, and services of entities that receive federal funds from or through CDOT (e.g., local public entities and private contractors) that are not directly controlled by CDOT. These local entities and contractors are generally referred to as subrecipients to distinguish them from CDOT as the primary recipient of the federal funds. CDOT's assurance to its federal funding sources that programs and activities will comply with statute requirements and corresponding regulations also applies to the programs and activities of each subrecipient that receives funds through CDOT.

### **3.2 Code of Federal Regulations**

The ADA Transition Plan meets the requirements of U.S. Department of Justice and U.S. Department of Transportation regulations, as summarized below. Applicable excerpts from the regulations are included as Appendix A.



**28 CFR Part 35 - NONDISCRIMINATION ON THE BASIS OF DISABILITY IN STATE AND LOCAL GOVERNMENT SERVICES** <https://www.ecfr.gov/current/title-28/part-35>

**28 CFR Part 35.105, Self-evaluation**

- Requires a public entity to conduct a self-evaluation of its current services, policies, and practices regarding non-discrimination and provide an opportunity to interested persons to participate in the self-evaluation process. The public entity must maintain on file who was consultant, problems identified, and modifications made.

**28 CFR Part 35.150, Existing Facilities**

- Requires a public entity with 50 or more employees to develop a transition plan to achieve accessibility for individuals with disabilities. The entity is tasked with identifying barriers to accessibility, describing how the entity will make facilities accessible, as well as developing a method and schedule for achieving program accessibility. Ensuring that interested persons are provided opportunities to participate in the development of the plan is also a critical component.

**28 CFR Part 35.107, Designation of responsible employee and adoption of grievance procedures.**

- Requires that a public entity that employs more than 50 persons must publish grievance procedures for resolution of complaints related to non-discrimination and designate at least one employee to coordinate the complaint procedures.

**49 CFR Part 27 Nondiscrimination on the Basis of Disability in Programs or Activities Receiving Federal Financial Assistance** <https://www.ecfr.gov/current/title-49/subtitle-A/part-27?toc=1>

**49 CFR Part 27.11, Remedial action, voluntary action and compliance planning**

- Requires a recipient of federal funds to designate an individual to evaluate its nondiscrimination program and consult with interested persons, including persons with a disability and organizations representing persons with a disability in the identification of shortcomings and evaluation of the program. It requires the recipient to modify policies or practices that do not meet nondiscrimination requirements, take remedial steps to eliminate the effects of any discrimination that may have resulted from previous policies and practices, and establish a system to periodically review and update the evaluation.



## 4.0 CDOT Policies

The Transportation Commission of Colorado was created under Title 43 of the Colorado Revised Statutes, §43-1-106 ([crs2021-title-43.pdf \(colorado.gov\)](#)). Paragraph (8)(a) gives the Commission the authority to formulate general policy with respect to the management, construction, and maintenance of public highways and other transportation systems in the state. This includes formulating policy directives related to non-discrimination and accessibility.

CDOT Policy Directive 604.0, Policy on Non-Discrimination ([policy-directive-604-0-policy-on-non-discrimination \(codot.gov\)](#)), became effective on January 22, 2014, and states:

“It is CDOT’s policy that no person shall on the ground of race, color, national origin, sex, disability, or age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination in any operation of CDOT or of any department or agency to which CDOT extends federal financial assistance.”

A memo from the Chief Engineer on September 12, 2016, informed CDOT’s employees of the adoption of the U.S. Access Board’s 2011 PROWAG (Public Right-of-Way Accessibility Guidelines) for curb ramps and upcoming revisions to standard plans and specifications as they relate to curb ramps ([Chief Engineer Update \(codot.gov\)](#)).

The Transportation Commission adopted an updated Policy Directive 605.0, Comprehensive Accessibility for Persons with Disabilities ([605-0-pd-comprehensive-accessibility-for-persons-with-disabilities\\_2018.pdf \(codot.gov\)](#)), on November 15, 2018, reaffirming CDOT’s continued commitment to ADA compliance. Policy Directive 605.0 is applicable to all services provided by CDOT and any entity that receives funding from CDOT for all Transportation Projects, Transportation Facilities, Building Facilities, other services, as well as all local agency Transportation Projects that interface with Colorado state highways and interstates regardless of the funding source.

On March 31, 2017 (updated August 3, 2018), Procedural Directive 605.1, ADA Accessibility Requirements in CDOT Transportation Projects ([0605-1.pdf \(codot.gov\)](#)), was updated to say that requirements ADA accessibility for CDOT projects are outlined the 2017 ADA Transition Plan. In addition, the Procedural Directive more clearly defined the terms maintenance and alteration, such that maintenance treatments are exempt from the requirement to install curb ramps, and outlined local agency responsibilities related to Title II ADA compliance and PROWAG.



## 4.1 Local Agencies

In alignment with CDOT Procedural Directive 605.1 ([0605-1.pdf \(codot.gov\)](#)), local agencies must meet or exceed PROWAG design and construction standards for curb ramps. If the Transportation Facility is Off System, CDOT may permit the local agency to utilize its own alternative standards and specifications regarding curb ramps, detectible warnings and other accessibility designs provided those alternatives comply with either the PROWAG guidelines or the most current Americans with Disabilities Act Accessibility Guidelines (ADAAG) guidelines. If the Transportation Facility is On System, the local agency must utilize CDOT's standards and specifications for the intersection or intersections; however, CDOT may allow the local agency to utilize its own standards and specifications if CDOT determines they meet or exceed CDOT's standards and specifications. The local agency may also utilize alternate specifications if it can demonstrate concurrence on the standards and specifications from the Department of Justice and receives approval from CDOT.

## 5.0 CDOT Standards

### 5.1 PROWAG Functional Accessibility

To assist with prioritization efforts on curb ramp projects and ensure fiduciary responsibility for the public, CDOT utilized public involvement efforts in 2017 to identify six-key criteria to determine if a curb ramp is functionally accessible. These requirements are the basis for how CDOT inventories, prioritizes, and records progress on curb ramp accessibility:

- Running slope of 8.3% or less.
- Cross slope of 2% (or equal to street or highway grade without Stop or Yield control).
- Curb ramp width of 48" or greater.
- Curb ramp joints and grade breaks are flush.
- Turning space area of 48" x 48" (48" x 60" when constrained on two sides - see M-608-1 for details).
- Clear space requirement of 48" x 48" wholly outside of active traffic lanes for diagonal curb ramps.

If a ramp has been identified as functionally accessible, it means that it is functioning as a ramp and provides an accessible path to the public, not that it is completely



compliant with all PROWAG requirements. CDOT developed fields and queries within the curb ramp inventory database (Section 8.1) that align with these PROWAG functional accessibility standards and uses this term and classification of ramps for reporting and prioritization. Guidance was provided to CDOT staff to use for the design, construction, and inspection of ADA Curb Ramp Program projects.

## 5.2 Design and Construction Standards

CDOT follows the design and construction guidance and standards in:

- U.S. Department of Transportation ADA Standards for Transportation Facilities, 2006
- U.S. Department of Justice 2020 ADA Standards for Accessible Design
- U.S. Access Board Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG)
- U.S. Access Board Revised Draft Guidelines for Accessible Public Rights-of-Way (PROWAG), 2005
- Federal Highway Administration Manual on Uniform Traffic Control Devices for Streets and Highways (MUTCD), 2009
- CDOT Manuals and Guidelines (Roadway Design Guide, Right of Way Manual)

A full list of relevant design requirements and guidance utilized by CDOT can be found in Appendix B.

In 2017, the CRBRC collaborated with CDOT's Standards & Specifications Unit to update the M-608 Curb Ramp Standards to include directional orientation of curb ramps, recommended placement of pedestrian push button post assembly, limited placement of newly constructed curb ramps on the apex/diagonal, modified detectable warning width tolerance on curb ramps, and a new standard for corner blended transition curb ramp design. These design standards were revised in relation to CDOT's adoption of PROWAG and were adopted February 2017. The adoption of the PROWAG standards allowed CDOT to publish more standard options for design engineers.

An update to the S-Standard for push buttons occurred in 2019. The standard reflects recommended placement(s) for a push button based upon the M-Standard's ADA curb ramp design. It also provides the end user information on key design elements outlined by both FHWA and PROWAG, such as type and location of push button.



Every attempt must be made to adhere to the CDOT M-Standards when upgrading curb ramps. If the CDOT M-Standard cannot be met, then PROWAG is the governing standard used by CDOT to ensure the accessibility of curb ramps. Any modification or deviation from the CDOT M-Standards must be documented using a Curb Ramp Variance Support Document ([crvsd\\_5-7-21.pdf \(codot.gov\)](#)).

The CRBRC provides comprehensive resources to engineers on its website on policy, scoping and design, construction, and measurement and documentation, as well as links to training materials and federal and state regulations regarding nondiscrimination and public access ([ADA Resources for Engineers – Colorado Department of Transportation \(codot.gov\)](#)).

### 5.3 Variances

Colorado has unique topography, environmental, and historic constraints that occasionally make it infeasible to meet CDOT’s Curb Ramp M-Standards. Because PROWAG requires designing and building compliant curb ramps to the maximum extent practicable, CDOT issued a memo on Technical Infeasibility and Curb Ramp Variance Support Document Process & Requirements ([crvsd\\_memo\\_12-2019.pdf \(codot.gov\)](#)). This memo provides guidance to project engineers regarding when to submit a Curb Ramp Variance Support Document ([crvsd\\_5-7-21.pdf \(codot.gov\)](#)).

The Variance Support document is evaluated and signed by the Region Program Engineer to ensure the requested variance is valid and every effort has been made to design and/or construct with accessibility considerations in mind. Supporting documents are attached to the relevant curb ramp record in the database, and are incorporated into reporting such that curb ramp geometrics outside of CDOT’s measurement tolerance do not flag the ramp as non-compliant as long as the appropriate documentation is attached.

### 5.4 Right-of-Way

The 2020 CDOT Right of Way Manual includes a description of an ADA Curb Ramp Acquisition Option that was first approved by the Transportation Commission on January 18, 2018, as a Pilot Program for the purchase the required right-of-way for accessible curb ramps ([TC 18-01-16 resolution-tc-18-01-16.pdf \(codot.gov\)](#)). The ADA Pilot Program streamlined the voluntary property acquisition process for private property that is needed for curb ramp improvements and construction, and was originally subject to future Transportation Commission public interest findings on a project-by-project basis. After the passage of Senate Bill 19-017, the Chief Engineer now makes the public interest findings. The Pilot Program (now known as the ADA Acquisition Option) is voluntary for landowners with no threat of condemnation, does





not use federal funds, and has been approved by the Federal Highway Administration (FHWA) and the Colorado Attorney General’s Office. CDOT will only acquire permanent easements and construction occupancy areas under the ADA Acquisition Option, and no parcels are to be acquired in fee simple. A description of the program and process is in Chapter 4 of the CDOT Right of Way Manual, Section 4.17.12 ([chapter-4-acquisition.pdf \(codot.gov\)](#)).

CDOT may still acquire private property for curb ramp improvements through typical processes if the ADA Acquisition Option would be difficult to implement. Complications preventing the ADA Acquisition Option’s implementation include high valuations, property encumbrances, CDOT desiring to acquire property in fee simple, and the project scope being too wide for the ADA Option’s approved purposes. While condemnation is not permitted under the ADA Acquisition Option, CDOT may condemn private property for curb ramp improvements if the typical processes are followed. It is important to note that acquisition of any real property, including temporary easements, requires Chief Engineer authorization. Settlement approvals above fair market value are subject to approval authority described in Chapter 10 of the CDOT Right of Way Manual, and condemnation requests require authorization from the Transportation Commission, which may impact the project timeline.

The Pilot Program and ADA Acquisition Option have been very successful and have been adopted by other states. FHWA has also authorized CDOT to implement the program more broadly. Between 80% and 90% of landowners have accepted CDOT land acquisition offers using the voluntary process with offers generally accepted within a few weeks. The ADA Acquisition Option has been used in four CDOT regions and in both urban and rural settings. It is estimated that hundreds of hours and thousands of dollars of staff time have been saved while reducing the average negotiation time by months for each property acquired.

Table 1 displays potential cost and schedule impacts based on right-of-way ownership. These estimates assume no condemnation is required; if condemnation is a necessity, three to nine months should be added to all time estimates.



Table 1. Cost and Time Impacts Based on Right-of-Way Ownership

Right-of-Way Ownership	Relative Resources Costs	Schedule Impacts (Months)
100% CDOT	Low	1-2; depending on whether right-of-way mapping is necessary
100% Local Government	Low to Moderate	3-4; assumes local agency will donate necessary right-of-way interest. Right-of-way plans should specify parcel that local agency will donate necessary right-of-way.
100% Other Government (e.g., U.S. Forest Service, Bureau of Land Management, State Land Board)	High	6-9 for small # of ramps on typical resurfacing project, i.e., minor rehabilitation
100% Private	Moderate to High	9-10
100% Unknown	High	9-12

## 5.5 Historic Properties

The CDOT Environmental Programs Branch (EPB) history program developed an internal methodology for projects involving reconstruction of curb ramps that fall outside of the CDOT right-of-way and have the potential to directly impact historic properties through minor easement or right-of-way acquisitions. This approach has assisted in mitigating schedule delays related to required historic clearances under Section 106 of the National Historic Preservation Act of 1966 (36 CFR Part 800).

The EPB history program also initially coordinated with the FHWA Colorado Division to evaluate ways to streamline the compliance process for Section 4(f) of the Department of Transportation Act (23 CFR 774), another federal regulation that protects historic and recreational properties, and requires avoidance, minimization, and mitigation of the physical use (e.g., easements, right-of-way needs, etc.) of eligible properties. However, it was determined that it would be difficult to programmatically address Section 4(f) for the overall ADA program, so Section 4(f) is still being applied on a project-by-project basis. In most cases, the Section 4(f) evaluation type has been at the exception or *de minimis* level, which does not require legal reviews or alternatives analysis and has not affected the project delivery schedule.

The CDOT history program coordinates with the State Historic Preservation Office on a case-by-case basis to facilitate compliance with Section 106 and Section 4(f) requirements for the reconstruction of curb ramps.



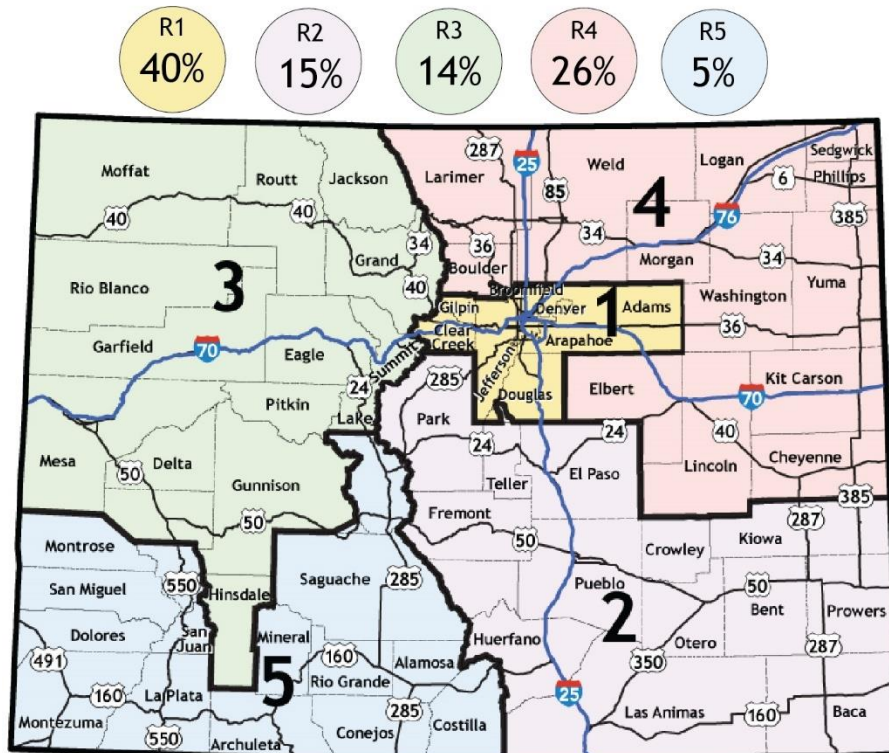
## 6.0 Curb Ramp Program

### 6.1 2017-2020

A key element of CDOT’s Accessibility Program is the Curb Ramp Program. The Curb Ramp Program was initiated in 2017 to address curb ramp deficiencies that were identified in the data collection process prior to 2017. The program had \$85 million of dedicated funding over a five-year period to upgrade curb ramps that would not be updated through the delivery of projects identified in CDOT’s 4-year projects list (<https://www.codot.gov/programs/your-transportation-priorities/funded-projects>). This funding was used for program and data management, design services, pre-construction services (such as historic clearances and right-of-way acquisition), and construction services.

The 5-Year Curb Ramp Program was primarily implemented through the CDOT Region offices, coordinated by an ADA Region Representative for each CDOT Region (shown in Figure 4). The percentage of curb ramps per Region is also shown in Figure 4.

Figure 4. CDOT Regions and Percentage of Curb Ramps



From 2017 to 2020, each CDOT Region submitted a Curb Ramp Prioritization Plan outlining its approach to addressing curb ramp noncompliance for the next State



Fiscal Year (July 1 through June 30). The Plans were approved by Regional Transportation Directors, the CDOT ADA Steering Committee, the team of ADA Region Representatives, and ultimately, CDOT's Chief Engineer. Because CDOT was in the early years of this unprecedented program, the methodology was evolving daily as problems were identified and solutions were developed. The Regional Prioritization Plans were considered living documents to be adapted as needed.

Each Region Curb Ramp Prioritization Plan included the following information:

- **Overall Approach to Prioritization:** How the Region intended to address curb ramp upgrades, including clarification on the curb ramps to be addressed via the five-year Curb Ramp Program versus regular project delivery.
- **Clearances and Pre-Construction:** Described how the Region would proactively address clearances, including potential right-of-way, historic, and environmental considerations, in light of the 2016 Colorado Supreme Court Decision No.16SA75 that required all right-of-way acquisitions to be approved by the Transportation Commission.
- **Achievement Goals:** Described regional goals regarding the number of curb ramps to be addressed and the timeline in which they would be addressed.
- **Anticipated Budget Expenditures:** Provided anticipated budget expenditure schedule for the upcoming State Fiscal Year.
- **Emerging Small Business (ESB) Requirements:** In an effort to encourage participation from the small business community, each Region developed a strategy to help ESB firms work on curb ramp projects. The CRBRC conducted a regional availability analysis of ESB firms for curb ramp work and identified an opportunity for program integration. This created a classification of projects restricted to bidding by ESB-certified firms only.

ESB restricted projects are contracts valued at \$1 million or less (ideally \$100k - \$300k). For the first three fiscal years of the program, each Region was provided a specific number of projects expected to be advertised as an ESB restricted project.

## 6.2 2020-2022

In 2020, CDOT focused efforts on enhancing the data system associated with the curb ramp inventory. This endeavor led to the creation of a data collection application (Survey123) that allows curb ramps that are field measured, reconstructed, or newly built to be updated in the data inventory in real-time (Section 8.1). The tool, combined with standing monthly meetings of the ADA Region Representatives,



eliminated the need for Regions to submit narrative prioritization plans because the live inventory displays and tracks program progress. Once Survey123 was up and running, CDOT modified the existing data schema so that all information collected could go into a central data set that was reportable and searchable. A central database for curb ramp inspections and inventory was brought online in 2020 (Section 8.1).

The curb ramp projects completed by each Region from 2020 to 2022 are shown in Table 2.

Table 2. Projects Completed by Region 2020 to 2022

Region	Projects Completed
Region 1	<ul style="list-style-type: none"> <li>• Approximately 170 ramps on Colorado Boulevard.</li> <li>• Approximately 80 ramps on Kipling Street, 6th Avenue, Parker Road, and Havana Street.</li> <li>• Over 500 curb ramps in the Denver-Metro area delivered through the Construction Manager/General Contractor (CM/GC) approach.</li> </ul>
Region 2	<ul style="list-style-type: none"> <li>• Walsenburg, ramps at 23 intersections on US 160/7th St. and CO 10/5th St.</li> <li>• Woodland Park along Colorado 67 from US 24 to Lucky Lady Dr.</li> <li>• SH 67 Corridor</li> <li>• Various locations along Colorado Highway (CO) 45, CO 47, CO 96, and CO 78 throughout Pueblo.</li> </ul>
Region 3	<ul style="list-style-type: none"> <li>• More than 100 ramps in Leadville in a historic district (28 design variances needed due to mountainous terrain and historic elements).</li> <li>• Mesa County ADA ramp improvements.</li> <li>• US 40 in Grand and Jackson Counties.</li> <li>• US 40 ADA upgrades in Grand and Jackson Counties (2020).</li> <li>• Garfield County ADA improvements (2020).</li> </ul>
Region 4	<ul style="list-style-type: none"> <li>• Fort Collins: various locations along CO 14, US 287, and the Prospect Rest Area off I-25.</li> <li>• US 34: Akron, Otis, Yuma, and Wray.</li> <li>• Limon residency addressed all ramps in the southeastern counties of Region 4.</li> <li>• Longmont: various locations on US 287, CO 66, and CO 119.</li> <li>• Boulder: various locations on SH 7, SH 93, SH 119, SH 157, and US 36.</li> <li>• Greeley: US 34 and Hwy 85.</li> </ul>
Region 5	<ul style="list-style-type: none"> <li>• US 50 and SH 291 in Salida.</li> <li>• US 160 Monte Vista resurfacing and ADA ramps (Monte Vista to Alamosa).</li> <li>• SH 142 in Manassa.</li> <li>• Smaller projects in Durango, Cortez, and Rico.</li> </ul>



At the end of the State Fiscal Year (FY) 2022, the ADA Region Representatives met to discuss their experiences under the 5-year Curb Ramp Program that could be incorporated into a refined approach moving forward.

Prioritization strategies used:

- Upgrades to “worst” ramps across the Region.
- Upgrades in a specific corridor or project.
- Upgrades within a specific geographical area or town.

Contracting strategies used:

- General contractor with subcontractors.
- Construction manager/general contractor.
- ESB-restricted contracts and ESB contractors.
- In-house design.

The following represents lessons learned during the 5-Year Curb Ramp Program:

- There is a limited number of contractors bidding on curb ramp-only projects. It appears to be the same pool of contractors across the state, causing contracting capacity issues.
- Had some challenges with the ESB-restricted projects due to the number of bidders. For some projects, bids were higher than with non-ESB contractors.
- ESB contracting was more successful in urban areas, and there was a learning curve about how to do business with CDOT.
- Mobilization costs are high and become a large percentage of the total upgrade cost. This led to Regions adapting their strategies to package projects within a given geographical region or corridor, rather than prioritizing the “worst” ramps in the Region.
- Upgrades to curb ramps are not as effective when the local agency-owned sidewalks are non-compliant. Non-compliant sidewalks are more often found in rural areas and older urban areas.
- Incorporating curb ramp upgrades onto new or reconstruction projects and paving and resurfacing projects has been successful.
- Variances have been needed for projects in hilly or mountainous topography, cross-slopes at curb and gutter for a landing or ramp, running slopes at inlet structures, gutter counter slopes and drainage around corners or tying into



highways with steep grades, utility obstructions, and cross slopes and turning space slopes at recreational trail crossings.

The following are ideas and concerns for future programs:

- Prepare design plans so that projects are shelf ready when funding becomes available.
- Desire to have more reliable funding stream to assist with long-term project planning.
- Focus will shift to returning to previously reviewed areas to ensure ramps were not missed and that outlier ramps have been upgraded (if needed).
- Include the ability to move inlets in the program to reduce number of variances.
- Partnering with local agencies to include curb ramp upgrades in local agency projects would be advantageous; however, funds management can be an issue.

### **6.3 2022 Forward**

With the end of the 5-Year Curb Ramp Program, CDOT is developing a new approach to planning and prioritizing ADA-related projects based on future program requirements. The overall approach includes the following strategies. Specifics about implementation are included in Section 8.0 and Section 9.0.

- Focus on improving corridors to reduce mobilization costs.
- Request additional curb ramp programs to establish a more consistent future funding stream.
- Enhance continuity of outreach and communication efforts with advocacy organizations to ensure public involvement is incorporated into future project planning.
- Focus on completion of data collection efforts for a more robust asset inventory.
- Increased collaboration with CDOT's Traffic and Safety Engineering Services to develop interdepartmental synergy with pedestrian safety and signalization implementation.
- Review and update of CDOT ADA Procedural Directive 605.1 (described in Section 4.0).



## 6.4 Training

CDOT conducts training sessions for Headquarters and Regional staff to increase understanding of the data collection and reporting tools, as well as provide a dialogue to discuss design standards and best practices. CDOT has on-demand training tools and information available on the website for both internal and external stakeholders (including local public agencies).

(<https://www.codot.gov/business/civilrights/ada/resources-engineers>).

### 6.4.1 Measuring Guidelines

CDOT has developed field inspection and measurement guidelines for both curb ramps and pedestrian push buttons to standardize the process for collecting existing information and to evaluate accessibility.

- The **Curb Ramp Measurement Guide** is a thorough training resource to establish consistency with measuring and inspecting curb ramps to ensure adherence to CDOT Standards and PROWAG requirements. The detailed, illustrated guide is available on the ADA Resources for Engineers webpage in both English ([Curb Ramp Guide-English](#)) and Spanish ([Curb Ramp Guide-Spanish](#)). It has illustrations of each type of curb ramp and provides the minimum required measurements for each curb ramp component and how to measure them.
- The **Pedestrian Push Button Measurement Guide** is a thorough training resource to establish consistency with measuring and inspecting pedestrian push buttons to ensure adherence to MUTCD, CDOT Standards and PROWAG requirements. The detailed, illustrated guide is available on the ADA Resources for Engineers webpage in both English ([PPB Guide-English](#)) and Spanish ([PPB Guide-Spanish](#)). It has illustrations of pedestrian push buttons with information about what elements are required and how to determine accessibility.

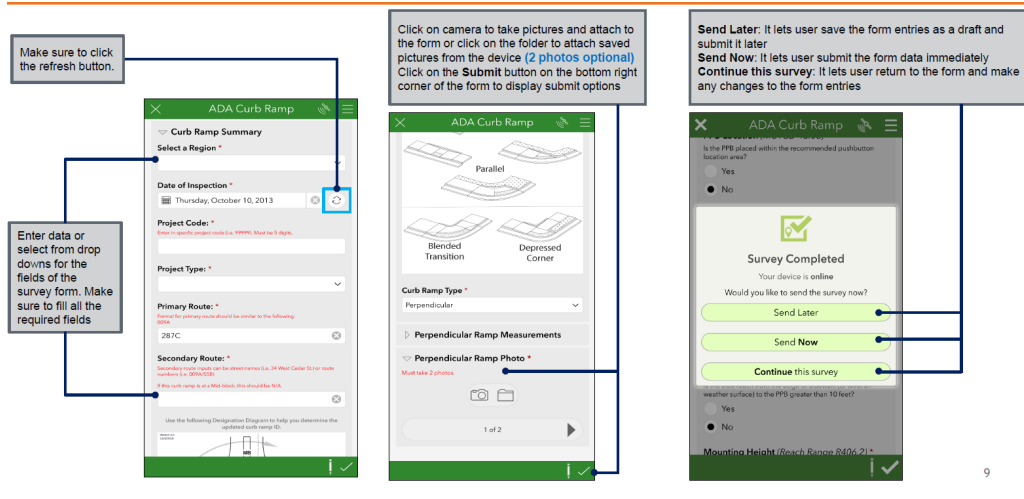
### 6.4.2 Survey123

Training resources for Survey123 and data entry include a Quick Start Guide and videos (<https://www.codot.gov/business/civilrights/ada/resources-engineers>). Screenshots from Survey123 are in Figure 5.





Figure 5. Survey123 Screen Shot



## 7.0 ADA Title II Complaint Procedure

### 7.1 Who May File a Complaint

Any person who believes that they have been excluded from participation in, denied the benefits of, or otherwise subjected to disability-related discrimination or who is filing on behalf of a person with a disability may use the CDOT Discrimination Complaint Form or contact the CRBRC directly for assistance as outlined in the full complaint procedure outlined on this web page [File a Discrimination Complaint – Colorado Department of Transportation \(codot.gov\)](#).

### 7.2 How to File a Complaint

Disability-related complaints must be filed in writing within 180 days from the last date of the alleged discrimination. However, individuals may contact the CRBRC if it is believed that the complaint may fall outside of this deadline. The CRBRC will respond with a confirmation that the complaint was received within 10 business days of submission.

While not required, complainants are encouraged to use the Discrimination Complaint Form which can be found on this web page: [File a Discrimination Complaint – Colorado Department of Transportation \(codot.gov\)](#)

If not using the Discrimination Complaint Form, the following information should be provided:



- The full name, address, and telephone number of the person who was allegedly discriminated against.
- The name of the organization that has allegedly discriminated, its address and telephone number, and any other identifying information.
- A description of the allegedly discriminatory actions that are the basis for the complaint (dates of the actions, names of those who allegedly discriminated, and witnesses).
- Any other information that is necessary to support the complaint.
- Copies of relevant documents (please do not send originals).

### **7.3 Conducting an Investigation**

Once the complaint is received, CDOT will review it to determine if CDOT has jurisdiction over the issues raised in the complaint. The complainant will receive an acknowledgement letter informing them the complaint was received. Depending on the specific complaint, the letter will also state whether the complaint will be investigated by CDOT or a different entity as described in the complaint procedures.

CDOT has 180-days to investigate the complaint. Most complaints will be investigated within 60-days. After the investigator completes the review as outlined in the complaint process, one of two letters will be issued to the complainant: a closure letter or a letter of finding. A closure letter summarizes the allegations and states there was not a violation and the case will be closed. A letter of finding summarizes the allegations and the interviews regarding the alleged incident, and explains whether any additional training of staff member(s) or other action will occur. For more detailed information, please utilize the complaint procedure process outlined on the CRBRC web page.

### **7.4 Record Retention**

The CRBRC shall maintain a summary of external ADA complaints for five years and copies of the complaints for one year.

## **8.0 Statewide Inventories (Plan to Identify Barriers or How Barriers Are Identified)**

CDOT has two databases that track inventory and ADA compliance. One of them contains curb ramp and pedestrian push button data; the other contains data on CDOT-owned buildings and facilities with public access.



## 8.1 Curb Ramps Inventory

CDOT has a robust data collection and management process. Prior to 2020, the team had a paper As-Built Form for field inspections to record curb ramp measurements and data was retained in several databases with incompatible schemas. This process was cumbersome to use and created a quality control and reporting bottleneck.

Therefore, a more innovative solution was sought, and collaboration occurred with the CDOT Department of Transportation Development (DTD) to configure Survey123 for ArcGIS (ESRI product) to align with CDOT’s M-Standards and PROWAG requirements.

Within six months of working with DTD’s GeoHub team, databases were reconciled under one schema with the Survey123 interface. CDOT can now record and monitor compliance with ADA Title II federal regulations, which leverages CDOT’s ability to use federal funding to make curb ramp upgrades.

Today, project managers and inspectors use Survey123 for data collection and inventory of curb ramps in CDOT’s right-of-way. Using the Curb Ramp Position Designation Diagram (<https://www.codot.gov/business/civilrights/ada/resources-engineers>), each curb ramp is assigned a unique identifier within the inventory database. Inspectors follow a standardized process to enter data into Survey123. Example flowcharts are included in Appendix C. Personnel use the app to update curb ramp measurements for each technical requirement in real-time into the inventory, which results in more accurate reporting and reduced processing time.

---

### Current Status

As of the date of this report, 18,938 (80.58%) of total curb ramps (23,501) have been inventoried.

CDOT’s statewide functional accessibility is:

Based on CDOT’s Functional Accessibility criteria:

- 9,957 (52.58% of inventoried ramps)

Based on PROWAG criteria:

- 6,108 (32.25% of inventoried ramps)

Current status of individual curb ramps (as recorded in the inventory database) can be found on CDOT’s website at [Curb Ramp Accessibility Initiative – Colorado Department of Transportation \(codot.gov\)](#).

---



The ArcGIS online curb ramp inventory is accessible to the public on this web page:  
<https://www.codot.gov/business/civilrights/ada/resources-engineers>.

## 8.2 Pedestrian Push Buttons (PPB) and Signals Inventory

CDOT is responsible for design and inspection of pedestrian push buttons that are in CDOT right-of-way, not those owned by a local jurisdiction. When a pedestrian push button is within the limits of a project, CDOT evaluates whether the push button needs to be upgraded. Based on MUTCD standards as well as the CDOT Standard S-614-45, the following data is collected for pedestrian push buttons within the CDOT right-of-way:

- Does the “Walk” signal require you to press the push button? Yes/No
- Is the PPB placed within the recommended MUTCD push button location area? Yes/No
- Is the PPB unobstructed and adjacent to a 30” x 48” level all weather surface? Yes/No
- Is the side reach from the edge of the sidewalk to the PPB less than 10”? Yes/No
- Is the PPB mounted between 42” and 48” above the finished surface? Yes/No
- Are the faces of the PPB and the PPB sign aligned with the crosswalk they serve? Yes/No
- Is the PPB Closed Fist or Finger Push activated? Yes/No
- Are there two PPBs located on this intersection corner? Yes/No
- Are the two PPBs separated by a distance of at least 10 feet? Yes/No

The Pedestrian Push Button inventory data is included in the ArcGIS database with the curb ramp data. At a future date, the public will be able to view the data on the ArcGIS web page.

## 8.3 Buildings/Facilities with Public Access

CDOT’s Property Management Program manages project-related land, improvements, and general ledger properties owned by CDOT for CDOT’s use. The program ensures that all facilities acquired or constructed by CDOT for CDOT’s use are constructed in accordance with all applicable laws and regulations. This also includes a statewide inventory of all CDOT properties. The Property Management Program maintains the inventory of its buildings in Survey123 - CDOT Building Condition Dashboard, as well as



the SAP system, using a unique building number. At this time, the data is not publicly accessible.

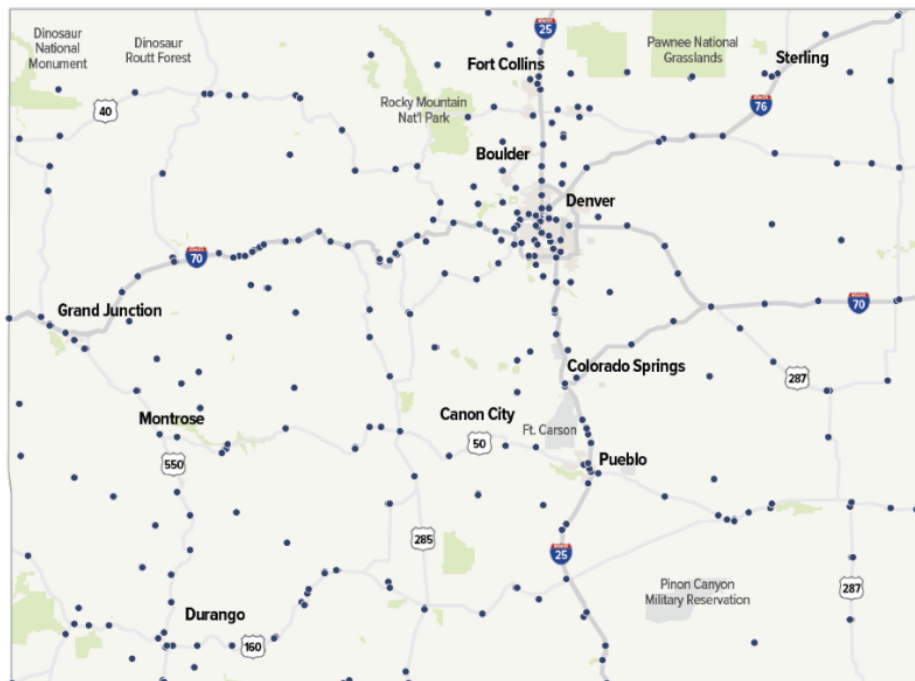
### 8.3.1 CDOT Offices and Other Facilities

CDOT owns and maintains 1,006 buildings. These buildings include vehicle storage facilities, mechanics shops, traffic shops, sand sheds, storage buildings, offices, and lab facilities. The properties in CDOT’s inventory are shown in Figure 4.

CDOT Property Management sends all new building facility construction plans to an external code reviewer to ensure ADA compliance. This includes design reviews from the architect, plan reviews by the county, compliance reviews by the local permitting office, and scope and compliance reviews by CDOT staff. This applies to vehicle storage facilities, transit centers, mobility hubs, and the Bustang Outrider bus stops.

The designs are always checked for ADA compliance which includes office areas, restrooms, sidewalk tactile warning surfaces, braille on signage and wayfinding, reserved parking, ramps, audible pedestrian notification devices, and many other accommodations for those with disabilities.

Figure 6. CDOT Offices and Buildings



CDOT’s annual facilities condition assessment considers the ADA compliance for CDOT offices and vehicle storage facilities/mechanical/traffic shops that are used by the public. The components rated are:



- Stairwell
- Stair handrails
- Hall
- Ramps
- Door hardware
- Elevator
- Entry Doors
- Bathrooms
- Drinking Fountain
- Signage
- Parking

**Current Accessibility Status**

As of the date of this report, the status of CDOT offices and other facilities that are assessed annually for accessibility statewide is:

- 71% of the 62 offices are letter grade C or better condition.
- 29% of the 264 Vehicle Storage Facilities and Traffic/ Mechanic Shops are letter grade C or better condition.

Most of the offices and facilities were built prior to 1990.

The individual scores are compiled into an overall condition rating for the facility, in accordance with the statewide grading system shown in Table 3. The latest scoring sheets are available upon request.

Table 3. Letter Grades for Buildings

Letter Grade	Score Range	Definition
A	90-100	Excellent-Condition appears new, no defects
B	80-89	Good - Good condition, shows slight wear
C	70-79	Average - Some noticeable wear
D	60-69	Fair - Noticeable wear, needs repair
F	59 and below	Poor - Extensive wear, needs to be replaced

CDOT’s risk-based Transportation Asset Management Plan (TAMP) includes an asset plan for Buildings. The most recent version is on the Transportation Asset Management Plan website <https://www.codot.gov/programs/tam/transportation-asset-management-plan>.

**8.3.2 Rest Areas**

CDOT’s Property Management group is responsible for inspection of the rest areas and for major repairs and reconstruction. CDOT’s rest areas and Welcome Centers are



shown on CDOT's COtrip Traveler Information map (<https://maps.cotrip.org/@-105.41218,39.09119,8?show=restAreas>).

The Colorado Transportation Commission formally added rest areas to CDOT's asset categories in 2018, making them subject to Policy Directive 14 (PD-14), Policy Guiding Statewide Plan Goals and Objectives, updated on November 19, 2020. PD-14 contains objectives and performance targets set by the Transportation Commission that guide the distribution of CDOT's financial resources. This designation also ensures a dedicated funding source for maintenance and upgrades to these assets. CDOT's Property Management group is responsible for inspection of the rest areas, major repairs, and reconstruction.

CDOT's rest areas have been inspected annually since 2019 using Survey123 and two dedicated staff. Inspectors rate the overall condition of each rest area. Rating elements include visual assessments of the condition of the building structure, building exterior appearance, appearance of grounds, condition of pavement and pavement markings, building interior cleanliness and appearance, ADA, and operation of utilities and fixtures.

For the ADA portion of the assessment, there are three distinct Compliance Evaluations performed for each rest area:

- Clear Path: Curb Ramps, Stairs, Handrails, Halls and Sidewalks, Ramps, Doors and Door Hardware
- Signage: Interior, Exterior
- Restroom: Stalls, Water Closets, Urinals, Lavatories, Drinking Fountain

The Clear Path and Signage portions evaluate each rest area for compliance with Chapters 3, 4 and 5 of the U.S. Access Board's Guide to ADA Accessibility Standards, while the Restroom portion evaluates compliance with Chapter 6 (<https://www.access-board.gov/ada/guides/>).

Within each Compliance Evaluation, if just one item fails to meet ADA requirements, the entire evaluation is failed and flagged for review. The Rest Area Asset Manager reviews the flagged evaluation and is responsible for coordinating repairs and fixes with local Region staff. Additionally, the assessment information is gathered and viewable to all CDOT employees via the Building Condition Assessment Dashboard. A building is placed on the replacement list if it cannot be retrofitted to meet ADA compliance. Based on the condition of primary rest area components, each rest area is given statewide letter score of A, B, C, D, or F (shown in Table 3 above).



PD-14 sets a target of no less than 90% of rest areas being rated C or better condition and a fiscally constrained target that no less than 85% of rest areas being rated C or better condition. If a rest area has a letter grade of C, at a minimum, it meets all ADA requirements. The latest scoring sheets are available upon request.

---

### Current Accessibility Status

As of 2021, the status of CDOT rest areas accessibility is:

- 47% of the 26 rest areas and 123 ancillary structures statewide have a letter grade C or better condition.

---

Beginning with the 2022 update, CDOT's risk-based TAMP will include an asset plan for rest areas. The most recent version is on the Transportation Asset Management Plan website: <https://www.codot.gov/programs/tam/transportation-asset-management-plan>.

## 8.4 Bustang Family of Services

The Bustang family of services includes Bustang, Outrider, and Pegasus.

Bustang is CDOT's interregional express bus service, connecting major populations, employment centers, and local transit entities along the I-25 and I-70 corridors. In 2019, the Outrider service expanded the reach of Bustang service to provide rural connections between rural areas and major transit hubs along the I-25 and I-70 corridors. A map of the Bustang and Outrider routes and stops is available at <https://ridebustang.com/routes-maps/>. The Pegasus service launched May 2022 operates passenger vans on the I-70 Mountain Corridor between Denver and Grand Junction. Passengers with disabilities receive discounted fares on all services.

Prior to launching its Bustang service in 2015, the Division of Transit and Rail (DTR), which is responsible for the services and bus operator contracts, collaborated with an interdisciplinary group to provide *Disability Awareness and Rider Rights* training for Ace Express coach drivers who operate the buses. Training personnel included representatives from the Colorado Cross-Disability Coalition, Denver Regional Mobility & Access Council, Colorado Department of Human Services, CDOT's DTR, and the CRBRC.

### 8.4.1 Service Stops

Most of the service stops for the Bustang family of services are located on property controlled by a local government or transit agency. As noted in FTA Circular 4702.1B





(Chap. IV-6), “Transit providers are not responsible for setting a policy for transit amenities that are solely sited by a separate jurisdiction...” These service stops are primarily public transit park-and-rides, light rail stations, or public transit centers.

CDOT is responsible for ADA compliance only at the service stops wholly within CDOT’s right-of-way and that it owns and operates. DTR coordinates with local agencies related to needed improvements at service stops owned and operated by them.

A comprehensive audit of the 86 Outrider stops is underway and is anticipated to be completed in winter 2022. The design for upgrades at some the existing locations is already underway with a goal of having construction completed by the end of 2023.

### **8.4.2 Parking Areas**

Parking areas associated with Bustang services that are located on CDOT right-of-way will be inventoried and evaluated as part of the comprehensive audit to be completed in winter 2023.

CDOT has identified 14 mobility hub locations to either improve or build new park-and-ride structures. These projects will be designed and constructed to comply with ADA requirements.

### **8.4.3 Ridership Services**

All vehicles purchased for the Bustang family of services must be ADA accessible. The coaches and shuttles are equipped with a wheelchair lift and wheelchair securement areas, as well as ramps and low steps.

Automated stop notifications are provided on most Bustang vehicles via the Regional Transportation District (RTD) Intelligent Transportation System INIT. When this service is unavailable on Bustang vehicles or other service vehicles, the coach operator uses the public address system to make ADA-required announcements.

## **9.0 Schedule for Curb Ramps and Pedestrian Push Buttons (Prioritization and Investments)**

### **9.1 Planned**

CDOT has expended most of the \$85 million that was authorized for the 5-Year Curb Ramp Program. Currently, ADA upgrades for curb ramps and pedestrian push buttons are addressed through planning, design, and construction of projects in the CDOT’s 10



Year Vision List ([10-Year Vision Plan & Story Map – Colorado Department of Transportation \(codot.gov\)](#)), the State Transportation Improvement Program (STIP), and the Surface Treatment Plan.

As CDOT continues to collect inventory data for accessibility, it will have a more efficient way to identify specific needs related to accessibility and identify which elements will not be addressed via regular project delivery. This information can be used to identify gaps in accessibility needs to be incorporated into CDOT’s long-term planning and funding process and project delivery strategies.

For FY23, CDOT has \$7.2 million in dedicated funding for curb ramps.

Specific ADA upgrade projects and upgrades included with new and reconstruction capital projects that are funded are listed on the 10-year project list to be completed in the next 1 to 4 years. Longer-term, unfunded projects are identified in the 10-year Vision Plan to be completed within the next 5 to 10 years ([10-Year Vision Plan & Story Map – Colorado Department of Transportation \(codot.gov\)](#)).

CDOT Regions can also use funding for curb ramps that is provided in CDOT’s Surface Treatment Program budget. Surface Treatment Program funding is allocated to the Regions on an annual basis.

The planned curb ramp projects using the dedicated Curb Ramp program funding for the next two years in the specific regions are listed in Table 4.

Table 4. Planned Projects by Region 2022 to 2024

Region	Projects
Region 1	<ul style="list-style-type: none"> <li>• Hampden/US 285 and Colorado Boulevard (just over 200 curb ramps) planned for Advertisement in August 2022.</li> </ul>
Region 2	<ul style="list-style-type: none"> <li>• US 285 and SH 9 project in Alma and Fairplay.</li> <li>• La Veta.</li> <li>• Woodland Park SH 24 corridor combined with US 24 overlay to Divide and will be advertised in 2023.</li> <li>• The El Paso County project to design about 40 corners so they will be ready for construction when budget is available. FOR is planned for September and advertisement in October 2022.</li> </ul>
Region 3	<ul style="list-style-type: none"> <li>• Eagle County in Vail, Avon, Edwards, Eagle and Gypsum.</li> </ul>
Region 4	<ul style="list-style-type: none"> <li>• Fort Lupton SH 52 project will be advertised fall 2022.</li> <li>• Inspection project to measure all ramps in Region 4 to help identify future ramp projects.</li> </ul>
Region 5	<ul style="list-style-type: none"> <li>• US 160 in Monte Vista and Alamosa.</li> <li>• SH 149 in Creede.</li> <li>• US 160 in Mancos.</li> </ul>



## 9.2 Public Requests

### 9.2.1 Pedestrian Push Buttons

The public can request that a non-accessible pedestrian push button be replaced via an Accessible Pedestrian Signal (APS) Request Form ([Colorado Department of Transportation APS Request Form \(codot.gov\)](https://www.codot.gov/transportation/aps-request-form)), as documented in CDOT's Accessible Pedestrian Signal Protocol ([cdot\\_aps\\_protocol\\_march\\_2017.pdf \(codot.gov\)](https://www.codot.gov/transportation/aps-protocol)). Funding for pedestrian push buttons installed or replaced at the request of the public is typically included in the CDOT Region Traffic Operations budget.

When CRBRC receives a request form, it is reviewed to determine what jurisdiction owns and/or maintains the intersection facility where the APS is being requested. The APS Request Form is forwarded either to the local municipality or to CDOT's local Regional Civil Rights Manager and Regional Traffic & Safety Office to determine the eligibility for the installation of an APS. If there is currently no pedestrian signal at a CDOT-owned location, an engineering study must be conducted to determine the feasibility of a crossing while maintaining the highest level of safety for all road users. If a pedestrian crossing is warranted and feasible, the APS devices are approved to be installed.

If there is a non-accessible pedestrian signal at the CDOT-owned crossing in question, retrofitting is automatically approved if the person requesting the APS has a visual impairment and regularly uses the crossing.

Designers are responsible for considering ADA accommodations during project design. If an APS is under consideration, a needs assessment for the device is conducted using a prioritization tool available in the National Cooperative Highway Research Program Report 3-62, Accessible Pedestrian Signals: A Guide to Best Practice report found at this link <https://www.trb.org/Main/Blurbs/159938.aspx>. The following factors are considered when conducting an engineering study:

- Potential demand for accessible pedestrian signals
- Traffic volumes during peak pedestrian crossing times
  - High/Low volumes of major/minor approaches
  - High volume of turning vehicles
- Complexity of the traffic signal phasing
  - Split phasing
  - Actuation
  - Leading pedestrian intervals or exclusive pedestrian phasing
- Complexity of intersection geometry
  - Skewed crossings



- T-shaped intersections
- Wide crossing or Pedestrian Refuge

When it is necessary to detour pedestrians to an alternate route during construction, temporary traffic control must maintain the same level of accessibility through the work zone. If APS devices were at the intersection under construction, they must be installed on the detour route.

### **9.2.2 Curb Ramp Intake Form**

To ensure an easy and direct route to the CRBRC to proactively address public concerns before they become complaints, CDOT has a Curb Ramp Request Intake Form ([CDOT Curb Ramp Request Intake Form \(codot.gov\)](https://www.codot.gov)) that is posted on the CDOT website for the public to fill out and submit as needed. Each submission is evaluated by the ADA Title II Specialist who works with the CDOT ADA Region Representative to determine the appropriate response.

## **10.0 Schedule for Buildings/Facilities with Public Access**

### **10.1 CDOT Offices and Other Facilities**

The Buildings Program receives a portion of the funds of CDOT's overall TAMP to fund rehabilitation and reconstruction work. CDOT's Maintenance unit conducts routine maintenance, preservation treatments, and repairs for buildings that do not require engineering. Those activities are part of the Buildings asset plan for controlled and deferred maintenance.

Funds for Buildings are allocated per PD 60.1 Property Management Funds Allocation, effective January 15, 2021, which can be made available upon request. Approximately 15% of the Buildings annual budget is reserved for ADA-related improvements, which are completed based on needs and available funds.

### **10.2 Rest Areas**

CDOT classifies rest areas into one of a three tiers based on the criticality and level of service provided to the traveling public, described in Table 5.



Table 5. Rest Area Tiers

Rest Area Tiering	Tier 1* Critically Important. Welcome Center or Vail Pass	Tier 2* Above Average	Tier 3* Basic
Key Entrance to State or Vail Pass	Yes	No	No
Daily Staffing	Yes	No	No
Internet Service	Yes	No	No
Separate Parking for Cars and Trucks	Yes	No	No
Air Conditioning	Yes	No	No
Kiosk Info with Maps/Brochures	Extensive	Mid-Range	No
Cell Service	Yes	Yes	No
Heat	Yes	Yes	No
Paved Parking	Yes	Yes	No
Potable Water	Hot & Cold	Hot & Cold	No
Picnic Tables	Yes	Yes	Maybe
Flush Toilets	Yes	Yes	Vault or Pit

\*Tier 1 – Critically Important to CO Rest Area System

- Located at key entrances and Vail Pass
- Paved parking, flush toilets, hot and cold potable water, heating and a/c, picnic tables, internet service, extensive kiosk info and racks with maps/brochures, and daily staffing

\*Tier 2 - Standard

- Paved parking, flush toilets, heating, picnic tables, mid-range kiosk info, cell service. May or may not have potable water.

\*Tier 3 - Basic

- Vault or pit toilets and minimal kiosk information. May or may not have cell service, picnic tables or heating. No potable water.

When rest areas were added to CDOT’s asset management program in 2018, it ensured a dedicated funding stream for rest area maintenance and upgrades. However, because of CDOT’s five-year budget cycle, rest areas will not receive funding until FY23, thereby pushing major upgrades and replacements until June 2023.

CDOT’s 2022 TAMP contains the projected budget for rest areas. Available funding in any given fiscal year is allocated to maintenance and upgrades based on the rest area’s Tier level. The rest area budget is reviewed annually and prioritized based on available funds for:

- Statewide critical repairs, safety enhancements, and ADA compliance
- Design and construction to replace deficient rest areas

During FY22, the following occurred:

- In March 2022, a Rest Area Steering Committee was established to increase partnership, collaboration, and communication between different CDOT



departments and programs who all have an interest in rest areas for various initiatives and projects.

- In April 2022, a Rest Area Sponsorship Program was finalized that will supplement existing funding sources with revenue generated.
- Construction will begin on the replacement for a Tier 1 rest area at Vail Pass fall/winter 2022.

## **11.0 Schedule for Bustang Family of Services**

Capital expenditures for Bustang family of service coaches, shuttles, and facilities are funded through CDOT's 10-year Plan. Operations and maintenance of Bustang service stops and mobility hubs will be partially funded by \$30 million in funding authorized in 2022 by Colorado Senate Bill 180 and Colorado Senate Bill 260 authorized in 2021—the State portion of the Multimodal Transportation and Mitigation Options funds.

## **12.0 Input to 2022 ADA Transition Plan Update**

CDOT developed a robust Stakeholder and Public Engagement Plan to support the ADA Transition Plan update. The plan included engagement with internal CDOT groups, external stakeholders, and the general public.

### **12.1 Internal CDOT Groups**

CRBRC held meetings with internal CDOT groups who are actively working with CRBRC to inventory CDOT-owned facilities for ADA compliance and develop programs to address identified deficiencies. Each group provided updates about their specific programs and activities related to ADA accessibility. These included:

CDOT ADA Region Representatives:

- Region accomplishments, lessons learned, and planned projects

CDOT Property Management:

- CDOT buildings and facilities with public access, including rest areas

DTR Bus Operations:

- Bustang family of services stops and services

### **12.2 External Stakeholders**

CDOT met with external stakeholders and the general public in 2022 and the goals of the engagement included:



- Inform stakeholders in the disability community and the public about how CDOT is implementing its Accessibility Program.
- Inform the key stakeholders in the disability community and public about progress and status of ADA upgrades since the last ADA Transition Plan.
- Provide opportunities for interested persons to understand CDOT’s approach to curb ramp accessibility (functional acceptability and criteria) and plans to bring its facilities in compliance with ADA requirements.
- Gain feedback from the community on the website ArcGIS curb ramp inventory tool—ease of use and data provided for each curb ramp.

CDOT maintains a list of 47 organizations that support differently abled persons throughout the state. The stakeholder list is included as Appendix D.

CDOT selected representative organizations to contact specifically about their interest in one-on-one meetings. The organizations represented a variety of communities and geographic regions. Eight organizations agreed to meet and provide feedback, described in the next section.

### **12.2.1 Stakeholder Meetings**

The following meetings were conducted from April 5 to July 21, 2022.

#### **Pikes Peak Area of Council Governments (PPACG)**

PPACG is made up of 16 municipal and county governments serving the southern Colorado community. They were aware of CDOT’s ADA Program, but they were not aware of the CDOT ADA website or the 2017 Transition Plan. PPACG noted the Metropolitan Planning Organization (MPO) funding structure has changed and that CDOT should adapt their processes accordingly.

#### **Disability Resource Services (DRS)**

DRS serves those in the northern Front Range who are disabled, and almost everyone in the office is also living with a disability. Prior to the stakeholder interview, DRS was not aware of CDOT’s ADA Program, the website, or the 2017 plan. Conversation topics included first and last mile issues, areas lacking audible push buttons, and the need to protect crosswalk medians.

#### **Denver Regional Mobility & Access Council (DRMAC)**

DRMAC’s mission is to promote mobility and access for all by addressing transit needs through public outreach and by coordinating the efforts of government agencies and transit providers. DRMAC had not heard about CDOT’s ADA Program, but they were



interested in learning more and using the website's tools. Discussion revolved around transit deserts (the distance between bus stops), sidewalks stopping without curb ramps in place, and curb ramp grades.

### **Atlantis Community, Inc.**

Atlantis Community, Inc. is a Denver-based organization with a mission to advocate for all people with disabilities to be a meaningful part of an integrated community of their choice. Atlantis was aware of the CDOT ADA Program and tools prior to the stakeholder interview. They emphasized that wheelchairs are going to get larger in size and new ADA plans should account for this. Other feedback included the importance of creating wheelchair charging stations, wider sidewalks, turning areas on ramps, and developing obstruction-free walkways.

### **Larimer County Office on Aging**

The Larimer County Office on Aging is the Area Agency on Aging (AAA) for Larimer County, providing services to Larimer County residents who are 60 and older. The program manager was aware of the CDOT ADA Program but had never used the forms or tools on the website. This stakeholder stressed the importance of addressing ADA concerns by region instead of using a statewide lens. They shared positive feedback on curb ramps and push button updates that were made in Larimer County.

### **Meeting the Challenge**

Meeting the Challenge is a Colorado Springs-based subsidiary of CP&Y, Inc., a full-service engineering, architectural, and construction consulting firm. MTC operates the Rocky Mountain ADA Center, whose prime focus is to help municipalities assess their ADA plans. MTC requested more consistent communications between municipalities and CDOT, project prioritization to be done in a use-based way instead of worst-first, and for CDOT to encourage maintenance of curb ramps so they can be used by all.

### **North Front Range Metropolitan Planning Organization**

NFRMPO works to promote a regional perspective on north Front Range issues, specifically transportation and air quality. The NFRMPO ADA coordinator was not familiar with the CDOT ADA program, PROWAG criteria, and CDOT website tools prior to the stakeholder meeting. Key feedback from this interview noted the importance of building with more sidewalk connectivity in mind, and developing more ramps for wheelchair users.

### **Center Toward Self Reliance**

CTSR is a Western Slope organization that helps people with disabilities and the elderly with rental issues, medical transportation issues, and the transition to nursing





homes. The CTSR case manager had reached out to CDOT in the past with a client complaint, and was familiar with the 2017 ADA plan and website. He was not familiar with the website's curb ramp inventory feature and was eager to use it in the future. Feedback included the need for transportation assistance for the first and last mile, and better curb ramp maintenance during the winter months.

### **12.2.1.1 Summary**

Key feedback received during these meetings includes:

- Five organizations were aware of CDOT's ADA Program, and only three had previously utilized the website and tools.
- Each of the five advocacy groups interviewed noted positive improvements in curb ramps and expressed gratitude towards CDOT for meeting with them.
- Of the three firms with engineering backgrounds, all of them agreed with the PROWAG criteria, and noted the importance of looking at curb ramps holistically to ensure better sidewalk connectivity.
- A key theme throughout all interviews was the importance of communications between CDOT and municipalities to ensure that work being done by all groups is compliant and consistent.

### **12.2.2 Digital Questionnaire**

In addition to the one-on-one external stakeholder meetings, a digital questionnaire was provided to external stakeholder groups to share with their members and constituents. The questionnaire was also sent by email to the stakeholder contact list.

Five people filled out the digital questionnaire. Participants were generally aware of CDOT's Accessibility Program (92% awareness); however, they were not familiar with information on CDOT's website detailing the level of accessibility of the CDOT-owned curb ramps (25% awareness), and did not know who to contact with a transportation accessibility issue (25% knew who to call).

Specific challenges that participants see in their communities about ADA transportation features included curb ramps and bus stops, ensuring that ADA aspects are adhered to, and that push buttons for doors at building entrances don't work.

For continued outreach and how they would like to be communicated with in the future, participants would like to see ongoing outreach and an ability to allow agencies that work with people with disabilities to distribute information about factors in the program.



One participant indicated that CDOT’s program is well devised and needed for the Colorado public. It was noted that there has been a lot accomplished since 2017 and progress was visible in the community.

### 12.3 Public Meeting

CDOT held an online public meeting on July 21, 2022. This public meeting was announced by email to the stakeholder contact list that included constituents around the state, many of whom are ADA coordinators for local agencies. There were social media posts on CDOT’s Facebook and Instagram platforms on July 18, 2022 (Figure 7).

A microvideo was sent to the stakeholder list to share on their social media accounts (Figure 8).

Figure 7. Post on CDOT's Facebook Page Advertising the Public Meeting





Figure 8. Microvideo Screenshots



The meeting was held from 5:00-6:30 PM MST over Zoom on an accessible platform with ASL interpreters. In all, there were 13 attendees located in four of the five CDOT Regions.

The CDOT Civil Rights Program Manager presented the following:

- Overview of the CDOT Civil Rights Program.
- CDOT’s prioritization of PROWAG criteria to determine functional performance of curb ramps.
- Curb ramp inventory and online database.
- ADA Transition Plan and 2022 update.
- CDOT’s distribution of funds to the Regions for curb ramps.
- Recent and upcoming ADA initiatives:
  - Curb ramp projects in each of the four CDOT Regions.



- Bustang family of services and Property Management (CDOT office buildings and rest areas.)
- CDOT’s efforts related to recent legislation regarding online content (House Bill 21-1110).
- CDOT’s ADA complaint process.

Opportunities were provided throughout the presentation for questions and comments.

This presentation is posted on the CRBRC website so that it may be viewed on-demand by the public, and the ADA Title II Specialist is available for consultations should questions arise.

## **13.0 Ongoing Informational Outreach**

### **13.1 Partner Agencies**

During the ADA Transition Plan update, CDOT identified eleven partner agencies that CDOT could reach out to regarding its Accessibility Program. CDOT is committed to keeping these local partners informed about its Accessibility Program progress and input to future plans.

CRBRC is working with CDOT Region staff to connect with Metropolitan Planning Organizations (MPO) and Transportation Planning Regions (TPR) around the state to share program information with local agency constituents. CDOT’s Region 4 ADA Representative recently presented at the North Front Range MPO quarterly meeting, and there is a plan to be on the 2022 fall/winter agendas for the Gunnison Valley TPR and San Luis Valley TPR meetings. CRBRC’s Communications Specialist will continue to coordinate presentations at other meetings around the state.

### **13.2 Accessibility Program Website**

The CRBRC public-facing website ([Civil Rights Programs – Colorado Department of Transportation \(codot.gov\)](https://www.crbrc.org/Civil-Rights-Programs--Colorado-Department-of-Transportation-codot.gov)) contains a link to CDOT’s ADA Title II Programs where there is information on CDOT’s Accessibility Program and regulations and guidelines that CDOT follows for accessibility. The website has pages for:

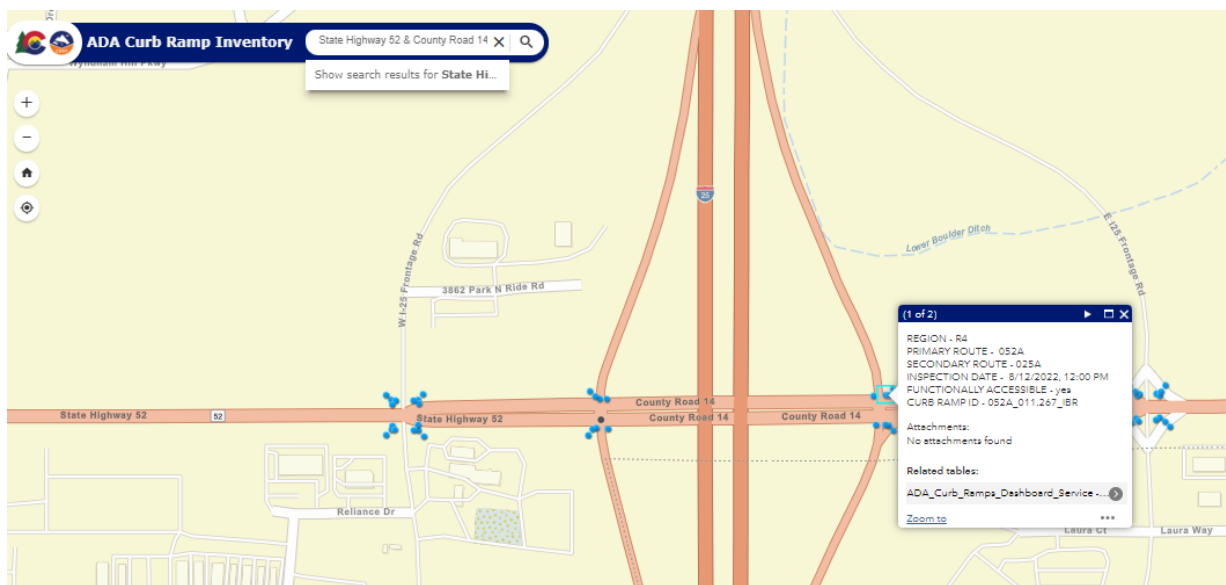
- Curb Ramps Program where there is an overview of the program and access to CDOT’s online GIS curb ramp inventory, the ADA Transition Plan, and request forms for installation of a curb ramp or an accessible pedestrian signal.



- ADA Compliance Transition Plan where there are links to the Curb Ramp Program and other informational materials.
- CDOT’s Accessibility options, including its Accessibility Statement, can be found at: [Accessibility – Colorado Department of Transportation \(codot.gov\)](https://www.codot.gov/business/civilrights/ada/curbramps).

CDOT’s curb ramp inventory database is publicly available at (<https://www.codot.gov/business/civilrights/ada/curbramps>). By clicking the link, users can see available curb ramp records and full geometrics by database field (Figure 9).

Figure 9. Curb Ramp Database Screenshot



### 13.3 Project Design

ADA and accessibility are priorities considered during the design and construction process for both capital projects and ADA upgrade projects. An integral part of CDOT’s project development process is public involvement—identifying needs of the communities in and adjacent to the project area and communicating project progress. The public is invited to provide input and voice concerns by way of a project website, online or in-person public meetings, and direct contacts with CDOT staff. In turn, CDOT communicates information about ongoing and completed projects, including the ADA components that enhance the projects.



## 14.0 Conclusion

CDOT's goal is to be the best Department of Transportation in the nation by providing freedom, connection, and experience through travel for all customers, which necessarily includes persons with disabilities. This 2022 ADA Transition Plan and CDOT's Accessibility Program are key components of reaching this goal and sets CDOT on a path toward providing equal access to all CDOT-owned facilities, services, programs, and activities in Colorado. CDOT is optimistic about its ability to bring its existing facilities up to standards and to build all future facilities to be ADA compliant. CDOT continuously pursues the intentional efforts set forth in this Transition Plan to meet that objective.



## Official Signature

A handwritten signature in black ink, appearing to read 'Shoshana M. Lew', is written over a horizontal line.

**Shoshana M. Lew**  
**Executive Director**  
**Colorado Department of Transportation**

**Date: October 25, 2022**



**COLORADO**  
Department of  
Transportation

2022 ADA Transition Plan

Appendix A.

## Federal Code of Regulations





## Federal Regulations that Govern Public Entity ADA Programs and Compliance

### 28 CFR Part 35 - NONDISCRIMINATION ON THE BASIS OF DISABILITY IN STATE AND LOCAL GOVERNMENT SERVICES <https://www.ecfr.gov/current/title-28/part-35>

#### 28 CFR Part 35.105, Self-evaluation

- (a) A public entity shall, within one year of the effective date of this part, evaluate its current services, policies, and practices, and the effects thereof, that do not or may not meet the requirements of this part and, to the extent modification of any such services, policies, and practices is required, the public entity shall proceed to make the necessary modifications.
- (b) A public entity shall provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the self-evaluation process by submitting comments.
- (c) A public entity that employs 50 or more persons shall, for at least three years following completion of the self-evaluation, maintain on file and make available for public inspection:
  - (1) A list of the interested persons consulted;
  - (2) A description of areas examined and any problems identified; and
  - (3) A description of any modifications made.
- (d) If a public entity has already complied with the self-evaluation requirement of a regulation implementing section 504 of the Rehabilitation Act of 1973, then the requirements of this section shall apply only to those policies and practices that were not included in the previous self-evaluation.

#### 28 CFR Part 35.150, Existing Facilities

- (a) General. A public entity shall operate each service, program, or activity so that the service, program, or activity, when viewed in its entirety, is readily accessible to and usable by individuals with disabilities.
- (d) Transition plan.
  - (1) In the event that structural changes to facilities will be undertaken to achieve program accessibility, a public entity that employs 50 or more persons shall develop, within six months of January 26, 1992, a transition plan setting forth the steps necessary to complete such changes. A public entity shall provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the development of the transition plan by



- submitting comments. A copy of the transition plan shall be made available for public inspection.
- (2) If a public entity has responsibility or authority over streets, roads, or walkways, its transition plan shall include a schedule for providing curb ramps or other sloped areas where pedestrian walks cross curbs, giving priority to walkways serving entities covered by the Act, including State and local government offices and facilities, transportation, places of public accommodation, and employers, followed by walkways serving other areas.
  - (3) The plan shall, at a minimum -
    - (i) Identify physical obstacles in the public entity's facilities that limit the accessibility of its programs or activities to individuals with disabilities;
    - (ii) Describe in detail the methods that will be used to make the facilities accessible;
    - (iii) Specify the schedule for taking the steps necessary to achieve compliance with this section and, if the time period of the transition plan is longer than one year, identify steps that will be taken during each year of the transition period; and
    - (iv) Indicate the official responsible for implementation of the plan.
  - (4) If a public entity has already complied with the transition plan requirement of a Federal agency regulation implementing section 504 of the Rehabilitation Act of 1973, then the requirements of this [paragraph \(d\)](#) shall apply only to those policies and practices that were not included in the previous transition plan.

**28 CFR Part 35.107, Designation of responsible employee and adoption of grievance procedures.**

- (a) *Designation of responsible employee.* A public entity that employs 50 or more persons shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under this part, including any investigation of any complaint communicated to it alleging its noncompliance with this part or alleging any actions that would be prohibited by this part. The public entity shall make available to all interested individuals the name, office address, and telephone number of the employee or employees designated pursuant to this paragraph.
- (b) *Complaint procedure.* A public entity that employs 50 or more persons shall adopt and publish grievance procedures providing for prompt and equitable resolution of complaints alleging any action that would be prohibited by this part.



**49 CFR PART 27 NONDISCRIMINATION ON THE BASIS OF DISABILITY IN PROGRAMS OR ACTIVITIES RECEIVING FEDERAL FINANCIAL ASSISTANCE**

<https://www.ecfr.gov/current/title-49/subtitle-A/part-27?toc=1>

**49 CFR Part 27.11, Remedial action, voluntary action and compliance planning**

(c) Compliance planning.

- (1) A recipient shall, within 90 days from the effective date of this part, designate and forward to the head of any operating administration providing financial assistance, with a copy to the responsible Departmental official the names, addresses, and telephone numbers of the persons responsible for evaluating the recipient's compliance with this part.
- (2) A recipient shall, within 180 days from the effective date of this part, after consultation at each step in paragraphs (c)(2) (i)-(iii) of this section with interested persons, including persons with a disability and organizations representing persons with a disability:
  - (i) Evaluate its current policies and practices for implementing these regulations, and notify the head of the operating administration of the completion of this evaluation;
  - (ii) Identify shortcomings in compliance and describe the methods used to remedy them;
  - (iii) Begin to modify, with official approval of recipient's management, any policies or practices that do not meet the requirements of this part according to a schedule or sequence that includes milestones or measures of achievement. These modifications shall be completed within one year from the effective date of this part;
  - (iv) Take appropriate remedial steps to eliminate the effects of any discrimination that resulted from previous policies and practices; and
  - (v) Establish a system for periodically reviewing and updating the evaluation.
- (3) A recipient shall, for at least three years following completion of the evaluation required under paragraph (c)(2) of this section, maintain on file, make available for public inspection, and furnish upon request to the head of the operating administration:
  - (i) A list of the interested persons consulted;
  - (ii) A description of areas examined and any problems identified; and
  - (iii) A description of any modifications made and of any remedial steps taken.



**COLORADO**  
Department of  
Transportation

2022 ADA Transition Plan

Appendix B.

## ADA Design Requirements and Guidance



## ADA Design Requirements and Guidance

### **ADA Standards for Accessible Design, U.S. Department of Justice (USDOJ), 2010.**

*For buildings and on-site facilities; applies to new construction or alterations as of March 15, 2012.*

Consists of 28 CFR parts 35 & 36 and the ADA and Architectural Barriers Act (ABA) Accessibility Guidelines for Buildings and Facilities (ADA-ABAAG; also referred to as the 2004 ADAAG), July 23, 2004, U.S. Access Board.

<http://www.access-board.gov/guidelines-and-standards>

### **ADA Standards for Transportation Facilities, U.S. Department of Transportation (USDOT), 2006.**

*For transit, light rail, and similar public transportation facilities.*

Consists of 49 CFR Parts 37 & 38 and the ADA and ABA Accessibility Guidelines for Buildings and Facilities (ADA- ABAAG; also referred to as the 2004 ADAAG), July 23, 2004, U.S. Access Board as modified by USDOT.

<http://www.access-board.gov/guidelines-and-standards>

**Department of Justice/Department of Transportation Joint Technical Assistance on the Title II of the Americans with Disabilities Act Requirements to Provide Curb Ramps when Streets, Roads, or Highways are Altered through Resurfacing, USDOJ and USDOT, July 2013.**

<http://www.ada.gov/doj-fhwa-ta.htm> <http://www.ada.gov/doj-fhwa-ta-glossary.htm>

**Manual on Uniform Traffic Control Devices for Streets and Highways (MUTCD)) Federal Highway Administration (FHWA), 2009, as adopted by the Transportation Commission of Colorado, effective December 15, 2011.**

<http://mutcd.fhwa.dot.gov/index.htm>

**Revised Draft Guidelines for Accessible Public Rights-of-Way (PROWAG), U.S. Access Board, November 23, 2005.**

*The current best practices for evaluation and design of pedestrian facilities in the public right of way per the FHWA memoranda noted:*

<http://www.access-board.gov/guidelines-and-standards>

[http://www.fhwa.dot.gov/environment/bicycle\\_pedestrian/resources/prwaa.cfm](http://www.fhwa.dot.gov/environment/bicycle_pedestrian/resources/prwaa.cfm)

[http://www.fhwa.dot.gov/civilrights/memos/ada\\_memo\\_clarificationa.htm](http://www.fhwa.dot.gov/civilrights/memos/ada_memo_clarificationa.htm)



**Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG), U.S. Access Board, July 26, 2011.**

*Federal Notice of Proposed Rule Making that gives a preview of potential future revisions to the 2005 PROWAG noted above.*

<https://www.access-board.gov/guidelines-and-standards/streets-sidewalks/public-rights-of-way/proposed-rights-of-way-guidelines>

**Shared-Use Paths**

<https://www.access-board.gov/guidelines-and-standards/streets-sidewalks/shared-use-paths>

**CDOT M-Standards Curb Ramps**

<https://www.codot.gov/business/designsupport/2019-and-2012-m-standards/2019-m-standards-plans/2019-m-standards-plan-sheets/m-608-1-curb-ramps/m-608-1-curb-ramps>

**CDOT S-Standards Pedestrian Push Buttons**

<https://www.codot.gov/safety/traffic-safety/assets/s-standard-plans/2019/s-614-45/s-614-45.pdf>

**CDOT 2018 Roadway Design Guide, Chapter 12 Accessible Pedestrian Design, CDOT, 2018.**

*For pedestrian facilities.*

[https://www.codot.gov/business/designsupport/bulletins\\_manuals/cdot-roadway-design-guide-2018](https://www.codot.gov/business/designsupport/bulletins_manuals/cdot-roadway-design-guide-2018)

**CDOT 2018 Roadway Design Guide, Chapter 14 Bicycle and Pedestrian Facilities, CDOT, 2018).**

*For bicycle and pedestrian facilities.*

[https://www.codot.gov/business/designsupport/bulletins\\_manuals/cdot-roadway-design-guide-2018/dg18-ch14](https://www.codot.gov/business/designsupport/bulletins_manuals/cdot-roadway-design-guide-2018/dg18-ch14)



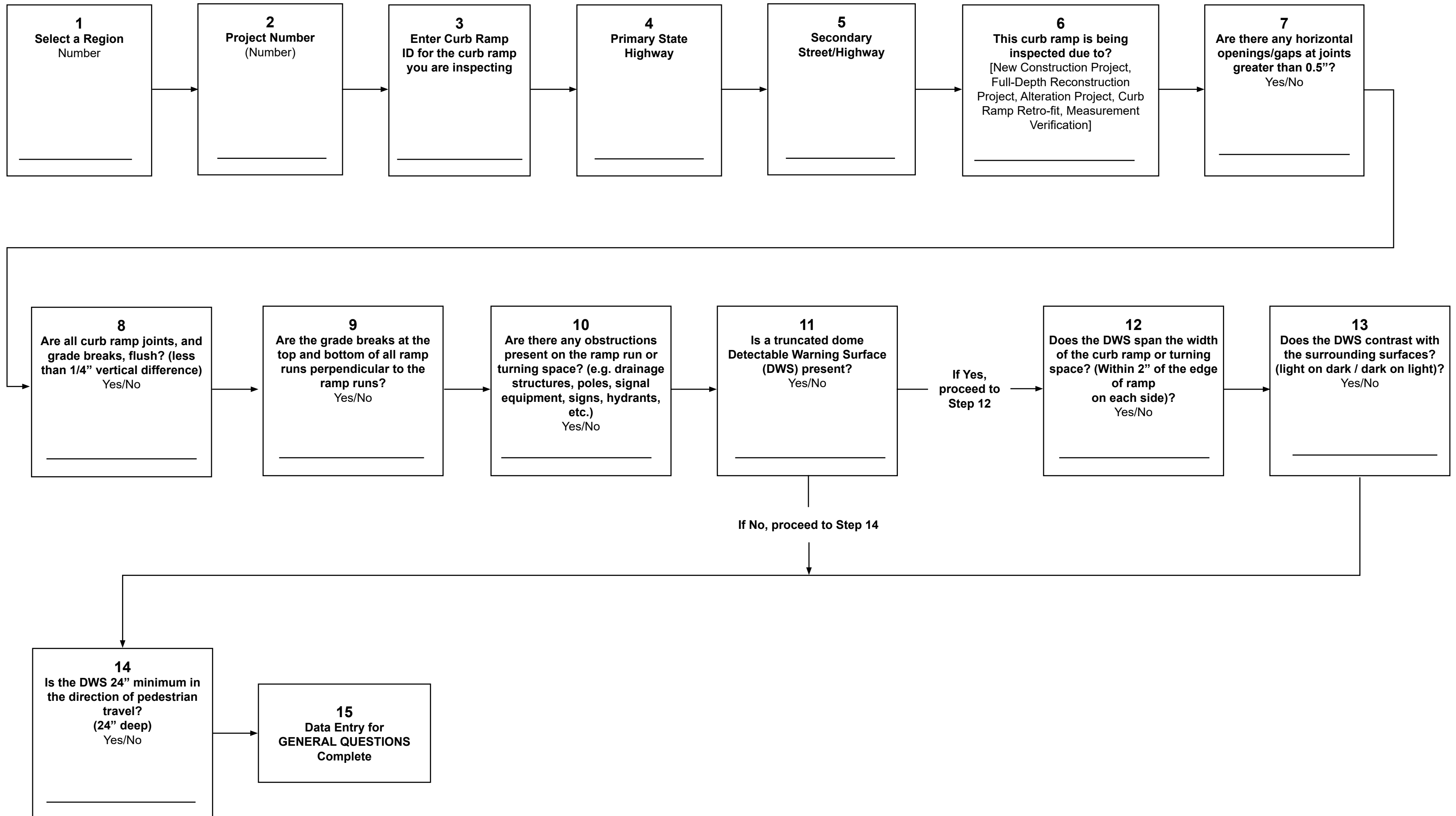
**COLORADO**  
Department of  
Transportation

2022 ADA Transition Plan

Appendix C.

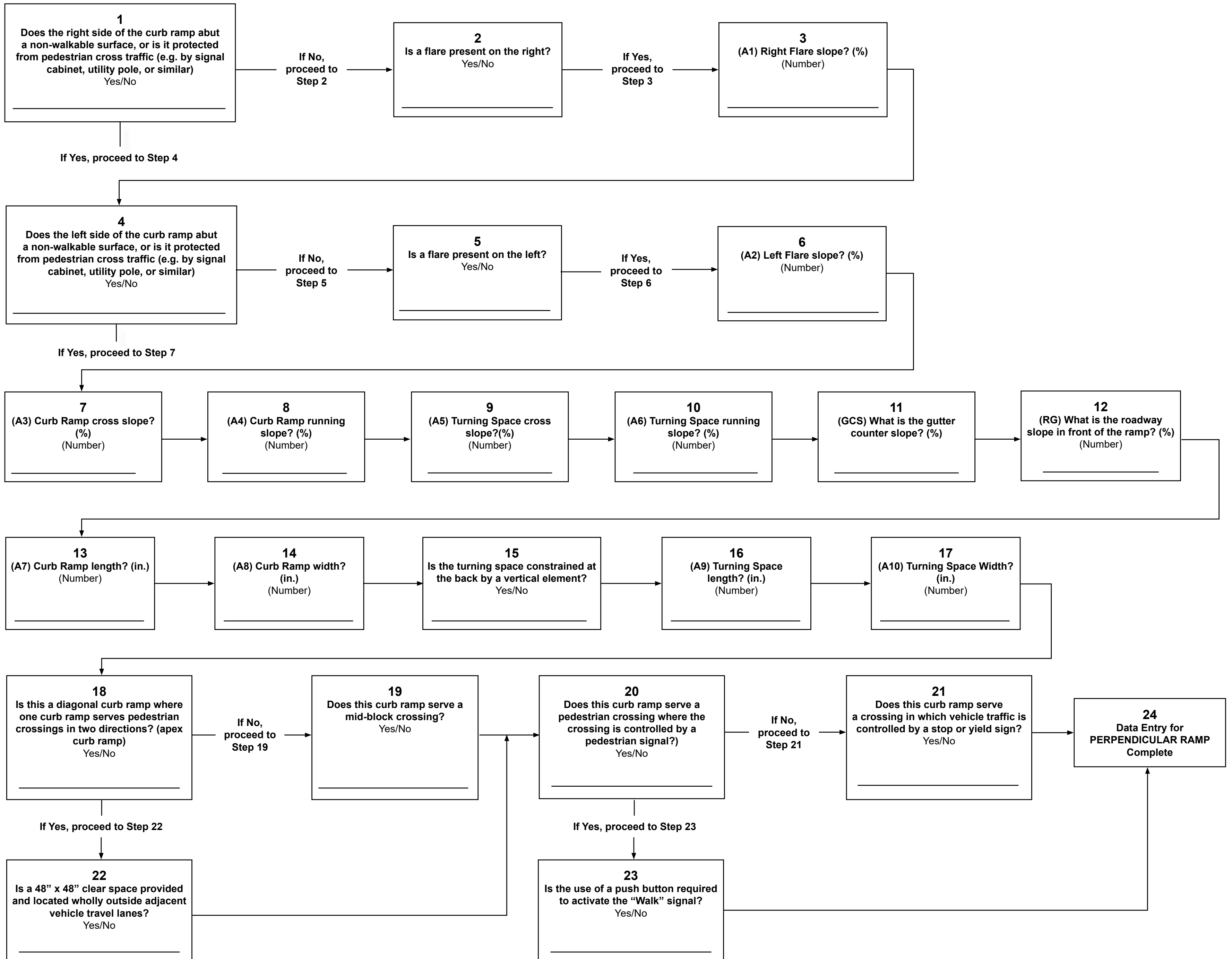
## Survey123 Data Collection Flowcharts

# General Questions

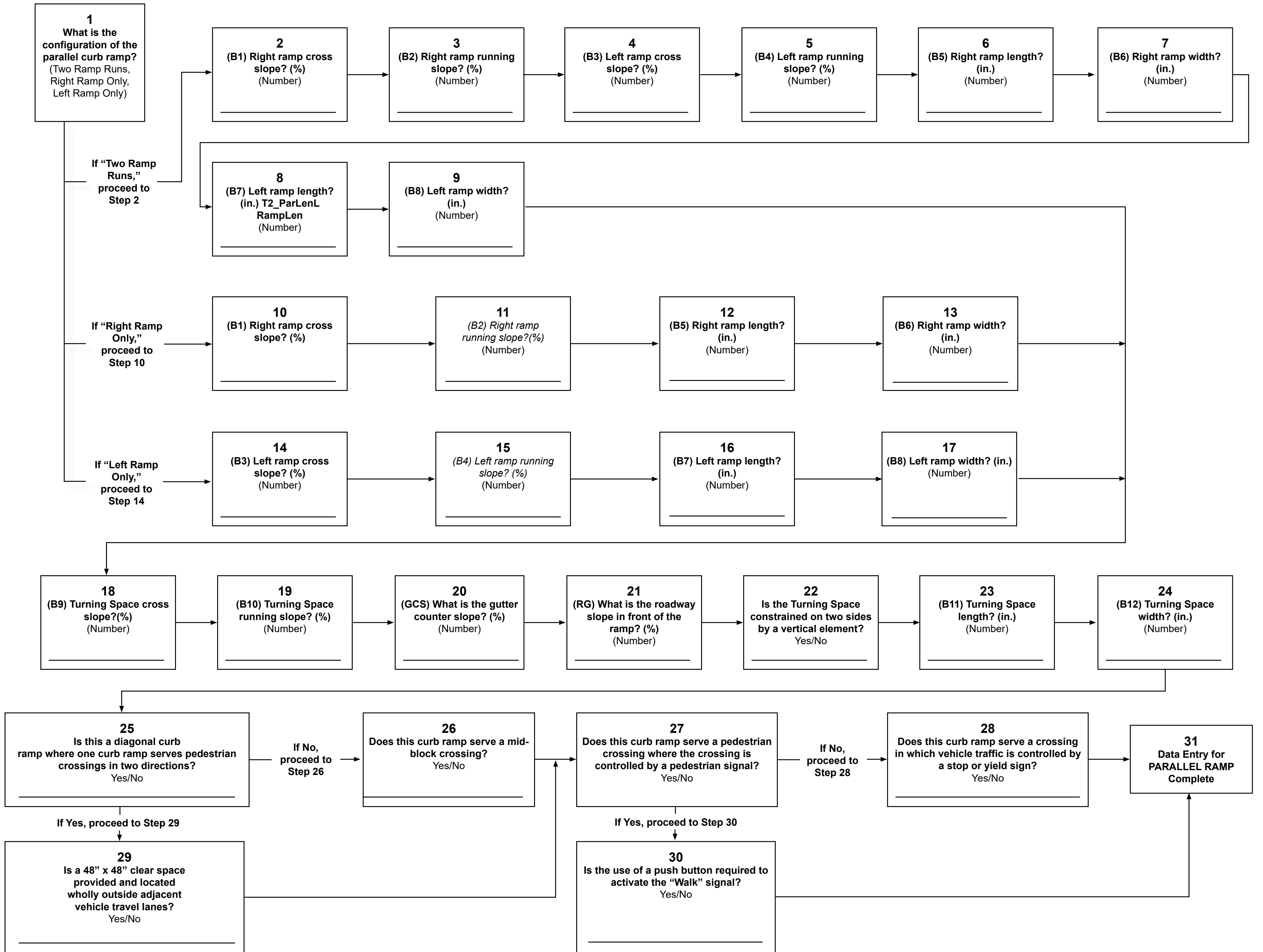




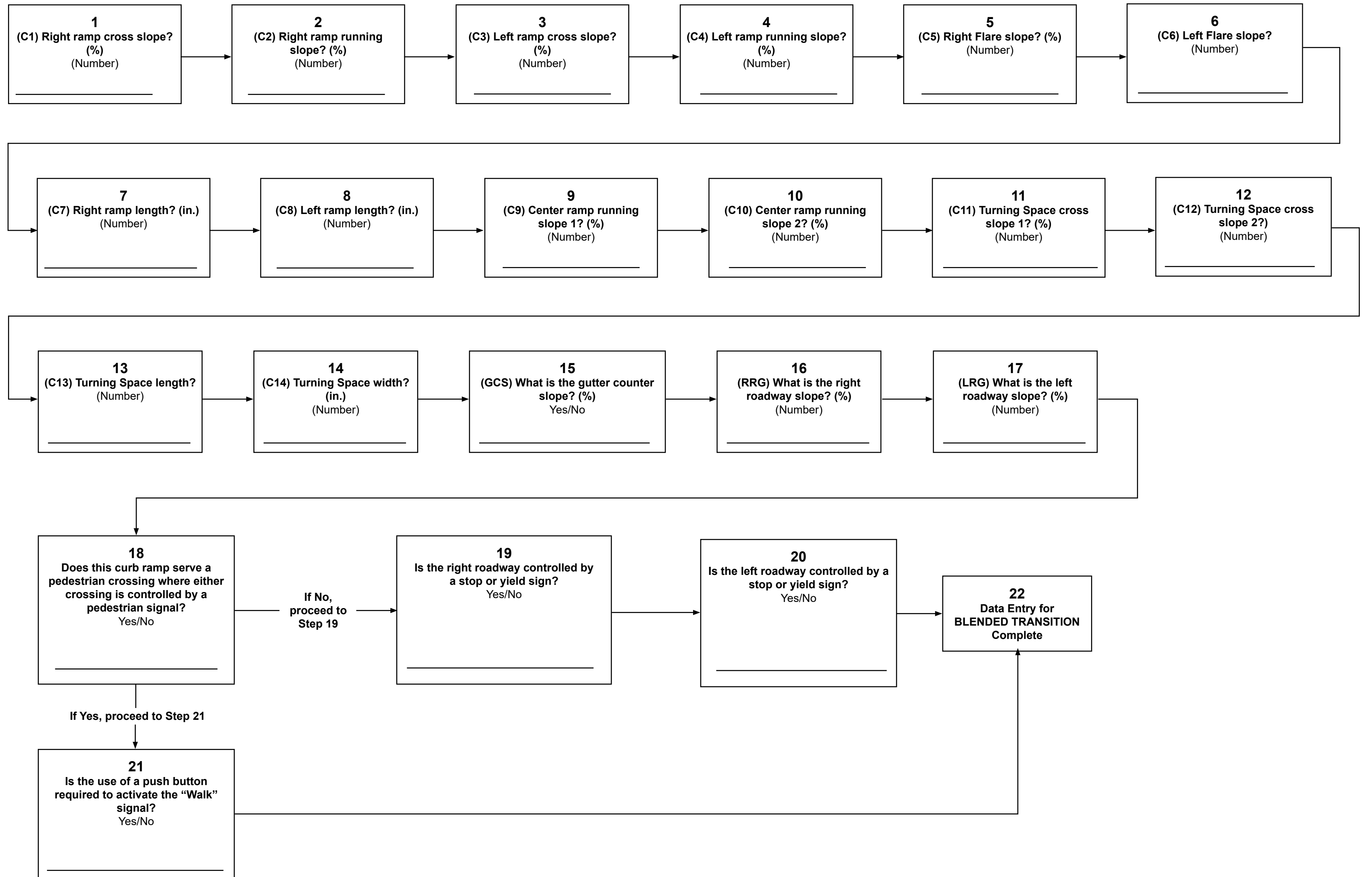
# Perpendicular Ramp



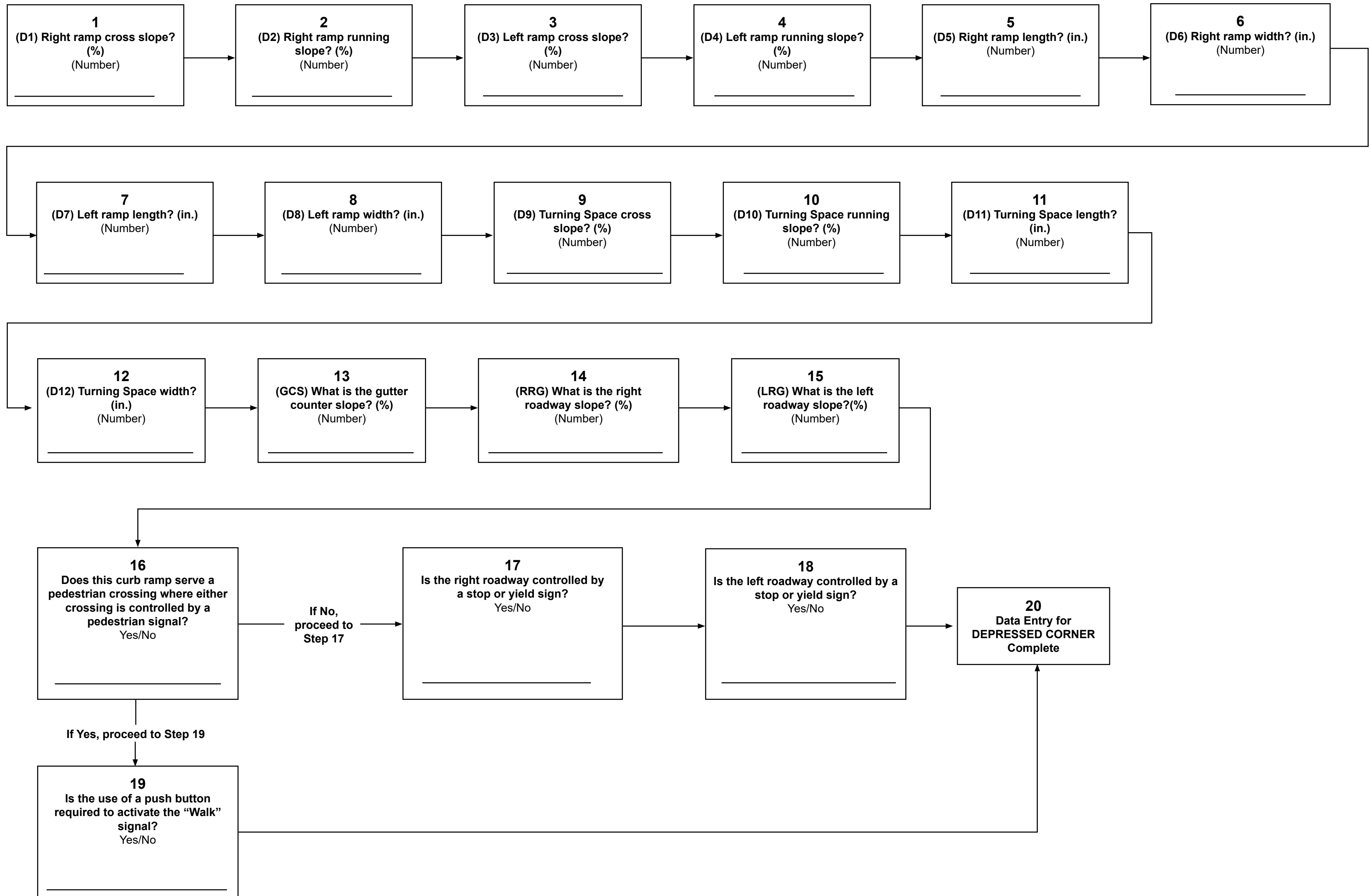
# Parallel Ramp



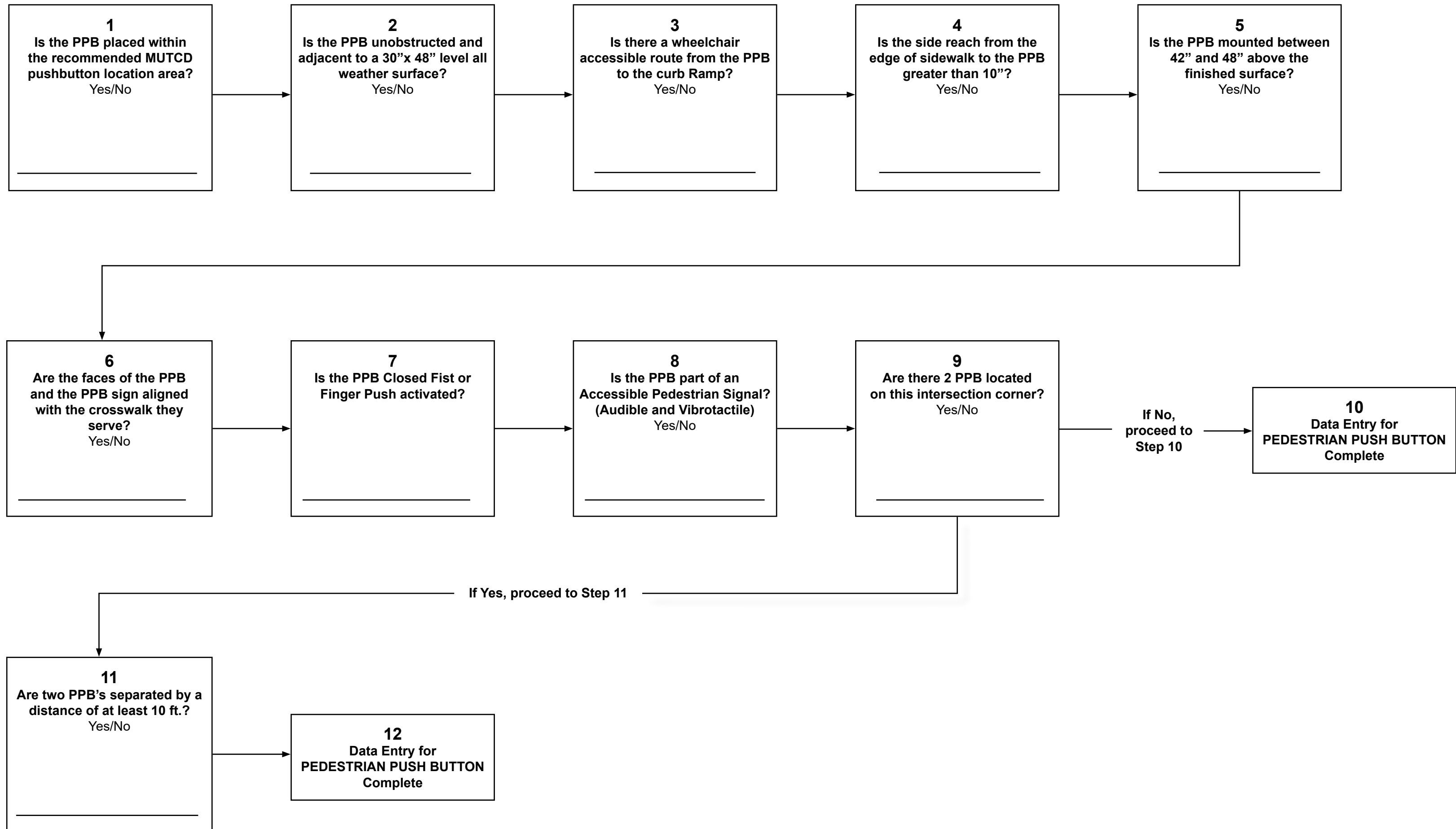
# Blended Transition



# Depressed Corner



# Pedestrian Push Button





**COLORADO**  
Department of  
Transportation

2022 ADA Transition Plan

Appendix D.

## Stakeholder Contact List



## CDOT 2022 ADA Transition Plan Update Stakeholder Organizations

Organization	Location	Website	Focus
A3 (American Council of the Blind Colorado)	Denver	<a href="http://www.a3colorado.org">http://www.a3colorado.org</a>	Vision Impairment
Ability Connection Colorado	Denver	<a href="http://www.abilityconnectioncolorado.org">http://www.abilityconnectioncolorado.org</a>	Children/Families
Adapt	Denver	<a href="http://www.adapt.org/">http://www.adapt.org/</a>	Advocacy
Adaptive Sports Association	Durango	<a href="http://www.asadurango.org">http://www.asadurango.org</a>	Sports
Adaptive Sports Center of Crested Butte	Crested Butte	<a href="http://www.adaptivesports.org">http://www.adaptivesports.org</a>	Sports
Adaptive Sports USA	Littleton	<a href="http://adaptivesportsusa.org">http://adaptivesportsusa.org</a>	National
Alliance	Denver	<a href="http://www.alliancecolorado.org">http://www.alliancecolorado.org</a>	Intellectual/Developmental
Alpine Area Agency on Aging	Silverthorne	<a href="http://alpineaaa.org">http://alpineaaa.org</a>	Seniors
Arc of Weld County	Greeley/Fort Lupton/Sterling	<a href="https://arcweldcounty.org/">https://arcweldcounty.org/</a>	Advocacy/Support Services
Association for Community Living in Boulder County	Boulder	<a href="http://www.aclboulder.org/">http://www.aclboulder.org/</a>	Developmental
Atlantis Community, Inc.	Denver	<a href="http://www.atlantiscommunity.org">http://www.atlantiscommunity.org</a>	Independent Living
Boulder County Area Agency on Aging	Boulder	<a href="https://bouldercounty.gov/departments/community-services/area-agency-aging/">https://bouldercounty.gov/departments/community-services/area-agency-aging/</a>	Seniors
Center for People with Disabilities	Boulder	<a href="https://cpwd.org/">https://cpwd.org/</a>	Independent Living
Center for Independence	Montrose/Glenwood	<a href="http://www.cfigj.org/">http://www.cfigj.org/</a>	Independent Living
CFGJ	Denver	<a href="https://www.cfgi.com/locations/">https://www.cfgi.com/locations/</a>	Accounting Services
Colorado Advisory Council for Persons with Disabilities	Lakewood	<a href="https://www.corada.com/links/colorado-advisory-council-for-persons-with-disabilities">https://www.corada.com/links/colorado-advisory-council-for-persons-with-disabilities</a>	Advocacy
Colorado Counties, Inc.	Denver	<a href="#">Colorado Counties, Inc. (CCI)   CCI is a non-profit, member</a>	Community Advocates
Colorado Cross-Disability Coalition	Denver	<a href="#">Colorado Cross-Disability Coalition   Home Page (ccdconline.org)</a>	Disability Advocacy
Colorado Developmental Disabilities Council	Denver	<a href="http://www.coddc.org/">http://www.coddc.org/</a>	Advocacy



## CDOT 2022 ADA Transition Plan Update Stakeholder Organizations

Organization	Location	Website	Focus
Colorado Springs Senior Center	Colorado Springs	<a href="http://ppymca.org">Colorado Springs Senior Center (ppymca.org)</a>	Seniors
Colorado Statewide Independent Living Council	Denver	<a href="http://coloradosilc.org/">http://coloradosilc.org/</a>	Independent Living
Connections for Independent Living	Greeley	<a href="http://www.connectionsforindependentliving.org/">http://www.connectionsforindependentliving.org/</a>	Independent Living Advocacy
Denver Commission for People with Disabilities	Denver	<a href="https://www.denvergov.org/content/denvergov/en/human-rights-and-community-partnerships/our-commissions/people-with-disabilities.html">https://www.denvergov.org/content/denvergov/en/human-rights-and-community-partnerships/our-commissions/people-with-disabilities.html</a>	Advocacy
Denver Regional Mobility and Access Council	Denver	<a href="http://drmac-co.org/">http://drmac-co.org/</a>	Mobility
Disabled Resource Services	Fort Collins/Loveland	<a href="http://disabledresourceservices.org/">http://disabledresourceservices.org/</a>	Advocacy
DRCOG Area Agency on Aging	Denver	<a href="https://www.drcog.org/programs/area-agency-aging">https://www.drcog.org/programs/area-agency-aging</a>	Seniors
Envision Creative Support for People with Developmental Disabilities	Evans	<a href="http://envisionco.org/">http://envisionco.org/</a>	Developmental
Foothills Gateway, Inc.	Fort Collins	<a href="http://www.foothillsgateway.org/">http://www.foothillsgateway.org/</a>	Cognitive
Greeley Center for Independence, Inc.	Greeley	<a href="https://www.adeoco.org/">https://www.adeoco.org/</a>	Independent Living
ILC Pueblo	Littleton	<a href="http://www.ilc.org">ILC of Colorado</a>	Disability Services
Jewish Disabilities Advocates	Denver	<a href="http://www.jewishfamilyservice.org/services/jewish_disabilities_advocates">http://www.jewishfamilyservice.org/services/jewish_disabilities_advocates</a>	Religious
Larimer County Center for Aging	Larimer	<a href="http://www.larimer.org/aging">Office On Aging   Larimer County</a>	General Community needs
Larimer County Office on Aging	Fort Collins	<a href="http://www.larimer.org/seniors/">http://www.larimer.org/seniors/</a>	Seniors
Leader Dogs	Grand Junction	<a href="http://www.leaderdogs.org">Welcome to Leader Dogs for the Blind  </a>	Dog services for the blind
Meeting the Challenge	Colorado Springs	<a href="http://www.meetingthechallenge.com">ADA Accessibility Specialists - Meeting the Challenge, Inc.</a>	Accessibility Consulting
NFRMPO Mobility Council	Fort Collins	<a href="http://nfrmpo.org/mobility/">http://nfrmpo.org/mobility/</a>	Mobility





## CDOT 2022 ADA Transition Plan Update Stakeholder Organizations

Organization	Location	Website	Focus
Northwest Colorado Center for Independence	Steamboat Springs (Dillon, Granby, Craig)	<a href="http://www.nwcci.org/">http://www.nwcci.org/</a>	Independent Living
Northwest Colorado Council of Governments	Silverthorne	<a href="http://nwccog.org">http://nwccog.org</a>	Government Organization
Peak Parent Center	Colorado Springs	<a href="https://www.peakparent.org">https://www.peakparent.org</a>	Children/Families
Pikes Peak Area COG Area Agency on Aging	Colorado Springs	<a href="http://www.ppacg.org/aging">http://www.ppacg.org/aging</a>	Seniors
Southwest Center for Independence	Durango (Cortez)	<a href="https://swindependence.org/">https://swindependence.org/</a>	Independent Living
The Independence Center	Colorado Springs	<a href="https://www.theindependencecenter.org/">https://www.theindependencecenter.org/</a>	Advocacy
Via Mobility Services	Boulder	<a href="https://viacolorado.org/">https://viacolorado.org/</a>	Mobility