



ADA Transition Plan

PREPARED BY
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September 2017



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The Colorado Department of Transportation (CDOT) dedicates this ADA Transition Plan to the people with disabilities who live, work, and play in the state of Colorado. CDOT appreciates their perseverance, patience, and willingness to collaborate on making Colorado's transportation facilities more accessible for the disabled community.

Acknowledgements

CDOT would like to thank the following individuals and entities for their participation and collaboration in the completion of this update to the Transition Plan document:

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In particular, CDOT appreciate the input provided by the Colorado Advisory Council for Persons with Disabilities, who have offered immensely helpful guidance on how CDOT can best serve their constituents. www.coloradodisabilitycouncil.org

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Section 1: Introduction

1.1 Background

CDOT strives to enhance quality of life for disabled citizens of Colorado by creating an integrated transportation system that focuses on safely moving people with disabilities via accessible linkages among modal choices. This Americans with Disabilities Act (ADA) Transition Plan describes and evaluates CDOT's policies, procedures, and practices for implementing accessible physical pedestrian improvements within the public right-of-way throughout the State of Colorado.

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 that the public entity provides. This Transition Plan will serve as an operational document to fulfill the requirements of Section 504 of the Rehabilitation Act and Title II of the American with Disabilities Act and its corresponding 2008 Amendment Act; and as 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, enhancement projects, and related literature and communications pertaining to any of these systems.

This Transition Plan is an update to the 2013 ADA Transition Plan, and is a living document that will receive routine updates. Within this document, CDOT looks back to assess what it has accomplished while also looking forward to develop greater accessibility for persons with disabilities throughout the state. CDOT's vision is to consider accessibility features in the design and construction of all projects with a focus on implementing compliance, continuity, and consistency while using taxpayer dollars wisely and judiciously.

The core of this Plan is the statewide curb ramp inventory effort that was originally outlined in the 2013 Transition Plan. As a result of this inventory, the CDOT

Transportation Commission has approved \$85 million in funding focused on achieving full curb ramp accessibility within five years. Thus, this Transition Plan will highlight our efforts in other program areas and will focus more thoroughly on the outcomes of the inventory and the early implementation plans for addressing deficiencies.

1.2 ADA Transition Plan Requirements

1.2.1 General Requirements

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 sub-recipients 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 sub-recipient that receives funds through CDOT.

1.2.2 Specific Requirements

The ADA Transition Plan is required by the Department of Justice 28 CFR Section 35.150(d) and the Department of Transportation regulations, 49 CFR Section 27.11 to address the following aspects of accessibility:

- A. Evaluate CDOT's current policies and practices for implementing the regulations, and notify the Federal Highway Administration (FHWA) of the completion of this evaluation;

- B. Identify shortcomings in compliance and describe the methods used to remedy them;
- C. Modify any policies and practices that do not meet ADA requirements according to a schedule or sequence that includes milestones or measures of achievement;
- D. Take appropriate remedial steps to eliminate the effects of any discrimination that resulted from previous policies and practices;
- E. Establish a system for periodically reviewing and updating the evaluation;
- F. Where structural changes to facilities are undertaken to achieve program accessibility, develop the steps necessary to complete changes to the facility;
- G. With regard to streets, roads, or walkways over which CDOT has authority, 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 Americans with Disabilities Act, including state and local government offices and facilities, transportation, places of public accommodation, and employers, followed by walkways serving other areas.
- H. Through a curb ramp inventory of CDOT's existing pedestrian facilities, CDOT will identify and address barriers to accessibility. The curb ramp inventory shall include at a minimum:
 - i. Identification of physical obstacles in the public entity's pedestrian facilities that limit the accessibility of its programs or activities to individuals with disabilities;
 - ii. A detailed description of the methods that will be used to make the facilities accessible;
 - iii. A 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.

- I. Describe the methods that will be used to make the pedestrian and building facilities accessible or how it will make its services accessible through other methods permitted by 28 CFR Part 35.150(a) and (b); and
- J. Specify the schedule for taking the steps necessary to achieve compliance with the ADA and, if the time period of the ADA Transition Plan is longer than one year, identify steps that will be taken during each year of the transition period.
- K. 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.

1.3 Responsibility

This Transition Plan has been prepared by CDOT's Civil Rights & Business Resource Center (CRBRC) in conjunction with an internal steering committee representing impacted and relevant divisions. The CRBRC also oversees compliance for ADA requirements and is the lead on implementing accessible programs, activities, and services.

CDOT's Organizational Chart depicts the Department's internal reporting structure (Appendix A).

The ADA Coordinator for CDOT and individual responsible for the implementation of the Transition Plan is:

Greg Diehl, Civil Rights Program Director
4201 East Arkansas Avenue, Suite 150 Denver, CO 80222
(303) 757-9599 | greg.diehl@state.co.us

The CRBRC will continue to be the primary contact and exercise oversight of all ADA Title II related matters for CDOT. The CRBRC will also continue to collaborate with the Office of Policy and Government Relations and the State Office of the Attorney General on technical interpretation of federal regulations and guidance concerning transportation facilities and buildings; and with the Standards and Specifications Unit, Project Development Branch to ensure field practices conform to relevant standards. The CRBRC's ADA Title II Technical Specialist and ADA Title II Program Manager continue to act as the expert resources for guidance on accessibility concerns related

to transportation facilities. Contact information for all members of the ADA Program Team can also be found on CDOT's website:

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

CDOT has established a focused organization chart for the 5-year ADA Curb Ramp Program (Appendix B). This organization chart outlines the structure of the program while also identifying the regional representatives who are the main point of contact for program development and implementation.

1.4 ADA Title II Complaint Procedure

1.4.1 Who May File a Complaint

Any person who believes that they have been the subject of disability-related discrimination or who is filing on behalf of a person with a disability may use the CDOT Discrimination Complaint Form (available on CDOT's website) or email the CRBRC (dot_civilrights@state.co.us) with the information set forth below.

1.4.2 How to File a Complaint

Disability-related complaints should provide:

- A. The full name, address, and telephone number of the person who was allegedly discriminated against;
- B. The name of the organization that has allegedly discriminated, its address and telephone number, and any other identifying information;
- C. 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);
- D. Any other information that is necessary to support the complaint;
- E. Copies of relevant documents (please do not send originals).

Complaints must be delivered to:

Colorado Department of Transportation
Civil Rights and Business Resource Center
4201 East Arkansas Avenue, Suite 150
Denver, Colorado 80222
Phone: (303) 757-9234 or (800) 925-3427
Website: <http://codot.gov/business/civilrights>

1.4.3 Conducting an Investigation

The CRBRC will notify both the complainant and the FHWA Colorado Division (FHWA-CO) Civil Rights Program Manager within five business days of receiving the complaint. The CRBRC or other authorized representative will then open an investigation into the merits of the complaint within 30 days. If necessary, the CRBRC or other authorized representative will contact the complainant directly to obtain additional facts or documentation relevant to the complaint.

The CRBRC shall prepare a written decision no later than 90 days following the receipt of the complaint, after full consideration and investigation into the complaint's merits. A copy of the written decision shall be mailed to the complainant and the FHWA-CO Civil Rights Program Manager no later than five business days after preparation of the final written decision.

If there are questions about this complaint process, an individual can call the CRBRC toll-free: (800) 925-3427 or locally: (303) 757-9234. Communication with hearing impaired persons is available through the Colorado Relay system: 711 or (800) 659-3656.

If the complainant is dissatisfied with the written decision, he or she may file a written appeal with the FHWA-CO Civil Rights Program Manager no later than 30 days after the mailing date of the written decision. The appeal must contain a statement of the reasons for dissatisfaction with the written decision, and must be signed by the complainant or by someone authorized to do so on the complainant's behalf. The FHWA-CO Civil Rights Program Manager will act upon the appeal in accordance with FHWA procedures.

The CRBRC shall maintain the confidentiality of all files and records relating to complaints filed, unless disclosure is authorized or required by law. Any retaliation, coercion, intimidation, threat, interference, or harassment for the filing of a

complaint, or used to restrain a complainant from filing, is prohibited and should be reported immediately to the CDOT CRBRC.

1.4.4 Record Retention

The CRBRC shall keep a record of all complaints filed for non-compliance with ADA and Section 504 of the Rehabilitation Act of 1973 for a minimum of three years.

Section 2: Policy, Practice, and Facility Evaluation

2.1 CDOT ADA Governing Documents

The Colorado Transportation Commission is composed of eleven members appointed by the governor in accordance with § 43-1-106, C.R.S. Section 43-1-106 (8)(a). This statute 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.

CDOT Policy Directive 604.0 (Appendix C), *Policy on Non-Discrimination*, was adopted on 1/22/2014 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.”

CDOT’s Transportation Commission also updated Policy Directive 605.0 in 2012 (initially adopted in 2004), reaffirming CDOT’s continued commitment to ADA compliance (Appendix D). Policy Directive 605.0 encompasses 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. These policies are posted on CDOT’s external website and staff Intranet, and have been distributed to all stakeholders involved in development of the 2013 ADA Transition Plan.

Procedural Directive 605.1: *ADA Accessibility Requirements in CDOT Transportation Projects* (Appendix E) was originally adopted in July 2012. In 2013, the Department of Justice and FHWA drafted and disseminated technical guidance that clarified definitions and expectations which resulted in a 2017 update to Procedural Directive 605.1 to meet requirements and include relevant agency processes and decisions.

Key Changes to Procedural Directive 605.1

- A. The 1.5 inch “Resurfacing Threshold” was eliminated from the procedural directive. Utilizing the technical assistance document referenced above, CDOT was able to more clearly define the terms maintenance and alteration within the document. For those treatments that are categorized within maintenance, no accessibility upgrade is required. However, for projects categorized under alteration, CDOT will install new or upgrade existing curb ramps to meet ADA standards.
- B. CDOT has adopted curb ramp standards from the Proposed Right-of-Way Accessibility Guidelines (PROWAG), which is highlighted in the Procedural Directive. A memo from the Chief Engineer (Appendix F) has also been issued to all CDOT employees to inform the agency of the adoption of these standards as they relate to curb ramps.
- C. CDOT is pursuing an accelerated curb ramp compliance program as part of its agency goal to be the best department of transportation in the nation. Over the next five years, \$85 million in Transportation Commission approved, planned funding will be allocated to address curb ramp compliance. This program will focus on upgrading ramps not scheduled to be addressed during regular engineering project delivery over the next 5 years, thus ensuring that the agency maximizes opportunities for program delivery. All maintenance projects completed by CDOT internal staff will be evaluated on a case-by-case basis to assess whether ramps should be addressed at the time of the project or at a later date during the 5-year ADA program.
- D. 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 that 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.

Other relevant design requirements and guidance utilized by CDOT can be found in Appendix G.

2.2 Services, Policies and Practices, & Facilities

2.2.1 General Services, Policies and Practices

CDOT formalized its approach to actively addressing ADA accessibility concerns in 2003 when the first Transition Plan and Design Bulletin regarding curb ramps and detectable warnings were developed. That 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 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.

Between 2003 and 2012, CDOT undertook a number of strategic improvement efforts to further advance ADA compliance across the Department, spending more than \$5 million on curb ramp installation and upgrades throughout the state. The CRBRC ADA 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.

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 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.

The CRBRC has 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 (S-614-9), 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. The group will continue to regularly review curb ramp and pedestrian pushbutton post assembly design standards to evaluate possible enhancements. These design standards were revised in relation to the recent adoption of PROWAG and were adopted February 2017.

2.2.2 ADA Training & Consultation

Between 2012 and 2017, the CRBRC hosted 17 training events for over 675 design, construction and engineering staff, consultants, and contractors regarding accessible pedestrian facilities in the public right-of-way as designated by the adoption of PROWAG. This two-day training, *Designing Pedestrian Facilities for Accessibility* is divided into eight modules:

- A. Laws, Regulations, and Pedestrian Characteristics
- B. Pedestrian Access Route
- C. Curb Ramps and Blended Transitions
- D. Detectable Warning Surfaces
- E. Pedestrian Street Crossings (Crosswalks)
- F. Accessible Pedestrian Signals
- G. Street Furniture and On-Street Parking
- H. Maintenance of Pedestrian Facilities & Alternate Pedestrian Access Routes in Work Zones

The CRBRC also provided Title II compliance training to state and local government agencies to address accessibility compliance for the 37 agencies with current Intergovernmental Agreements. The team will subsequently prioritize those local agencies not currently working with CDOT.

2.2.3 Bustang Interregional Express Bus Service

Bustang is a relatively new (summer 2015) interregional express bus service that connects commuters along the I-25 Front Range and I-70 Mountain corridors. Prior to launching a fleet of 13 Bustang vehicles, CDOT staff collaborated with an interdisciplinary group to provide *Disability Awareness and Rider Rights* training for Ace Express Coaches 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 Division of Transit & Rail (DTR), and the CRBRC.

In 2016, CDOT audited all Bustang vehicles and facilities for ADA compliance (Appendix H). CDOT is now actively meeting with collaborators and interested parties (e.g., local agencies, transit stop stakeholders) to identify the most effective approach to resolving barriers to accessibility. Meetings focused on developing a schedule to address deficiencies will begin January 2018.

2.3 Building Facilities

CDOT evaluated accessibility of its office locations in 2005 using a checklist based on applicable standards at the time. As a result of that review, all CDOT buildings open to the public were determined to be compliant with the standards, deficiencies were corrected, or alternative methods of service delivery permissible under 28 CFR Parts 35.150(a) and (b) were identified. Where CDOT identified physical barriers, the barriers were either addressed or services were relocated to accessible buildings.

In 2013, CDOT updated the building facilities checklist to reflect the 2010 ADA Standards and requirements. CDOT continues to use this checklist as a resource to support periodic building facility reviews by the property management division and it is available on CDOT's website.

Using the updated building facilities checklist, CDOT completed an additional six audits on CDOT office buildings throughout the state in 2016 (Appendix I). These audits are currently being reviewed internally so that a strategy and schedule can be developed to address any deficiencies. This schedule will be complete by January 2018.

Finally, CDOT Property Management sends all new building facility construction plans to an outside code reviewer to ensure ADA compliance. For vehicle storage facilities this review includes the office areas and restrooms.

2.3.1 CDOT Rest Areas

CDOT maintains a system of 28 rest areas on highways throughout the state, 26 of which were open during the 2016 audit season. CDOT audited those 26 locations (Appendix J) and has posted the rest area audit results on the website so that the traveling public can easily see rest area accessibility prior to traveling. Following the audit, it was determined that CDOT is not responsible for the Rangely Rest Area and will therefore communicate the identified deficiencies to the appropriate agency.

Rest area improvements are planned to occur in three concurrent phases based on the capacity required for the changes. As improvements are made to Phase A and B elements, maintenance personnel are able to input the associated work order number in the appropriate column of the spreadsheet for efficient tracking. (Appendix K)

Phase A: Minimal resources required; estimated time for completion is 6-12 months (estimated completion date: 6/30/2018)

Phase B: Funding may be required for these items and will require planning as well as coordination with the Engineering staff; estimated time for completion 12-24 months (estimated completion date: 6/30/2019)

Phase C: Funding will be required for these items and the deficiencies will be addressed through the 5-year ADA Curb Ramp Program; estimated time for completion is 24-36 months (estimated completion date: 6/30/2020)

2.4 Communications

2.4.1 CDOT Website

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.

CDOT has taken and will continue to take steps to ensure that communications with internal and external stakeholders with disabilities are effective. This includes provision of auxiliary aids (sign language interpreters, readers, Braille, large print

text) and notification that these aids are available upon request, as required by 28 CFR 35.160(a) and (b)(1), 28 CFR 35.163(a) and 49 CFR 27.7(c)C.

Between 2004 and 2009, CDOT modified its website and content management processes to provide accessibility to individuals with hearing or visual impairments. The core elements of these changes were:

- A. Implementation of Plone, an open-source Web Content Management System that complies with the requirements of Section 508 of the Rehabilitation Act, Title II of the ADA, and Colorado Revised Statute 24-85-101-104. This system is fully operational at www.codot.gov.
- B. Implementation of mandatory training for all employees who use the system to author and publish content for public consumption. Part of the curriculum addresses visual impairment accessibility and how to manage content to satisfy the representation of that content to end users. This system allows compliance of consistent branding, security, taxonomy, policies and standards, and accountability.

CDOT has published the Colorado Relay number on its website and will continue to make the number available on meeting announcements, flyers, and other documents.

CDOT will continue to exercise oversight on local agency projects to foster effective communication with persons with disabilities, and will actively discuss accessibility accommodations that should be available for all project communications.

2.4.2 Ongoing Outreach

CDOT offers a variety of traditional and digital opportunities for the public to provide input on decisions. These methods include but are not limited to:

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

Section 3: Statewide Curb Ramp & Pedestrian Pushbutton Inventory

3.1 Background

The 2013 ADA Transition Plan outlined a process to inventory CDOT's curb ramps in order to develop an upgrade schedule. As a result of this process, the CDOT Transportation Commission approved \$85 million in dedicated funds to address ADA compliance for all on-system curb ramps over the next five years.

The 2013 Curb Ramp Inventory process used existing intersection data, video logs, aerial imagery and supplemental information from the CDOT regional offices and local jurisdictions to create an "identify and locate" desktop collection. Over a six month period, CDOT completed a base inventory of existing and absent curb ramps for 13,579 intersections and 43,732 corners across the state. Please refer to the 2013 ADA Transition Plan (pp.27-51) for details on the inventory process.

3.2 Curb Ramp Inventory

3.2.1 Data Collection

20,101 existing curb ramps have been inventoried, including geometrics and where applicable, data about the surrounding footprint of the curb ramp (Appendix L). CDOT also identified an additional 1,537 locations where curb ramps should exist but currently do not, for a total of 21,638 locations to be considered for improvement over the next five years.

Details of these 21,638 locations are available to the public on CDOT's website, via both the ArcGIS database map (all geometrics) and by viewing the ramps according to tier in a Google Earth file. The CRBRC team is also working to create a design view Google Earth file that will better serve staff as they design and build curb ramps.

3.2.2 Functional Accessibility & Measurement Tolerance

Based on PROWAG's stipulation that curb ramps be designed and built to the guidelines *to the maximum extent practicable*, CDOT has identified six key criteria to determine if a curb ramp is *functionally accessible*:

- A. Running slope of 8.3% or less
- B. Cross slope of 2% (or equal to street or highway grade without Stop or Yield control)
- C. Curb ramp width of 48" or greater
- D. Curb ramp joints and grade breaks are flush
- E. Turning space area of 48" x 48" (48" x 60" for Type 2C curb ramps)
- F. Clear space requirement of 48" x 48" wholly outside of active traffic lanes for diagonal curb ramps

Upon review and analysis of other State Departments of Transportation practices related to acceptable tolerances, CDOT has made the decision to accept a measuring tolerance of 0.5% for curb ramps and the footprint around the curb ramp (Appendix M). This tolerance was determined based on the manufacturers' stated accuracy of the digital levels used for data collection.

Manufacturer #1: A "guaranteed maximum inaccuracy of .029 degrees" (.51%)
Manufacturer #2: Inaccuracy of +/- .1° (.17%) at 0° and 90° and +/- .2° (.35%) at all other angles.

Curb ramps falling within the functional accessibility requirements (+ the 0.5% measurement tolerance) will not require reconstruction nor will the assets be placed on a plan for consideration during this five-year program. If a complaint is filed on a curb ramp that falls within the tolerance, that complaint will be investigated and addressed as needed.

Based on the six criteria and the acceptable measurement tolerance, CDOT's current statewide functional accessibility is:

Compliant curb ramps: 4,661 (23% of existing ramps)
Non-compliant curb ramps: 15,440 (77% of existing ramps)

3.3 Pedestrian Pushbutton Inventory

3.3.1 Data Collection

The accessibility assessment for pedestrian pushbuttons (PPB) was based on seven key factors combined into one data field. The seven key factors to assess were identified by reviewing regulations set forth in PROWAG, MUTCD, 2010 ADA Standards, and 1991 ADAAG Standards. CDOT hired and trained temporary GIS field technicians to evaluate

PPBs, and if any factor did not meet ADA compliance, the PPB data field defaulted to non-compliance. The seven factors evaluated were:

- A. IsButtonAccessFromRamp - Between the edge of the crosswalk line (extended) farthest from the center of the intersection and the side of the curb ramp (if present), but not greater than 5 feet from said crosswalk line (exclusive of wing/flare)? Yes/No
- B. IsButtonAccessFromCurb - Between 1.5 and 6 feet from the edge of the curb, shoulder, or pavement or 10 feet max? Yes/No
- C. IsButtonAccessAdjacent - Is there a 4 foot by 4 foot level area adjacent to the PPB? Yes/No
- D. IsButtonAccessAdjacent2% - Is there a 2% cross slope or less for the adjacent level area? Yes/No
- E. IsButtonAccessSideReach - Is there a maximum 10 inch or less side reach? Yes/No
- F. IsButtonAccess42_48 - Is the PPB height between 42" and 48"? Yes/No
- G. IsButtonAccessRoute - Is there a wheelchair accessible route from the curb ramp to the PPB? Yes/No

3.3.2 Pedestrian Pushbutton Compliance

Using the criteria above, compliance query results are:

Compliant PPBs: 2,207 (15% of existing PPBs)

Non-compliant PPBs: 12,199 (85% of existing PPBs)

Section 4: Analysis and Upgrade Plan

4.1 Implementation to Date (FY 13 - FY 18)

CDOT has demonstrated a strong commitment to upgrading and enhancing ADA elements on projects by spending nearly \$7 million on 156 different projects from July 1, 2012 - August 15, 2017 on ADA-related elements. The ADA Elements Project Report (Appendix N) is a report that contains a list of projects completed and currently under construction in the last six years that addressed one or more of the following ADA-related pay items:

- 202-00206 Removal of Concrete Curb Ramp
- 608-00010 Concrete Curb Ramp
- 608-00011 Curb Ramp (Fast Track)
- 608-00012 Curb Ramp (Special)
- 608-00015 Detectable Warnings
- 608-00016 Detectable Warnings (Install Only)
- 608-01010 Bituminous Curb Ramp
- 202-00860 Removal of Pedestrian Push Button
- 210-00860 Reset Pedestrian Push Button
- 614-72860 Pedestrian Push Button
- 614-72861 Pedestrian Push Button (Install Only)
- 614-72862 Pedestrian Push Button (Special)
- 614-72863 Pedestrian Push Button Post Assembly
- 614-72865 Pedestrian Interval Timer
- 614-75860 Pedestrian Push Button (Install Only)
- 614-79860 Pedestrian Push Button (Furnish Only)

4.2 Future Curb Ramp Upgrade Prioritization

To better organize the inventory, CDOT established a system of three Tiers, further subdivided into categories based on the degree of concern and/or access (Appendices O and P). The development of these Tiers was informed by a public survey completed in conjunction with the 2013 Transition Plan, which groups intersections and roadway segments by priority based on the facilities they serve. CDOT also presented this system to the Colorado Advisory Council for Persons with Disabilities to receive feedback on the structure. The Council was in agreement with the tier structure and provided CDOT with a letter of support regarding the approach (Appendix Q).

Tier 1: Required but not existing, or running slope exceeds 12.5%

Red (Non-rural area): Ramp is required, but is not existing. Or, curb ramp running slope exceeds 12.5%

Orange (Rural area): Ramp is required, but is not existing. Or, curb ramp running slope exceeds 12.5%

Tier 2: Running slopes between 9% and 12.5%

Green (Non-rural area): Ramp exists with running slope between 9% - 12.5%

Turquoise (Rural area): Ramp exists with running slope between 9% - 12.5%

-AND-

Tier 2: Running slope between 5% and 9% and has no turning space (or no turning space data was collected)

Magenta (Non-rural area): Ramp exists with running slope between 5% - 9%. There is either no turning space or no turning space data is reported.

Yellow Category (Rural): Ramp exists with running slope between 5% - 9%. There is either no turning space or no turning space data is reported.

Tier 3: Running slope between 8.33% and 9%, and all others

Gray (Rural & Non-Rural): Ramp exists with running slope between 8.33% - 9%.

White Category (Rural & Non-Rural): Other accessibility concerns; not categorized above.

For this system, rural is defined as an area with less than 5,000 residents, while non-rural is defined as an area with more than 5,000 residents. This distinction is for CDOT planning purposes only and does not affect the urgency with which the ramp will be addressed.

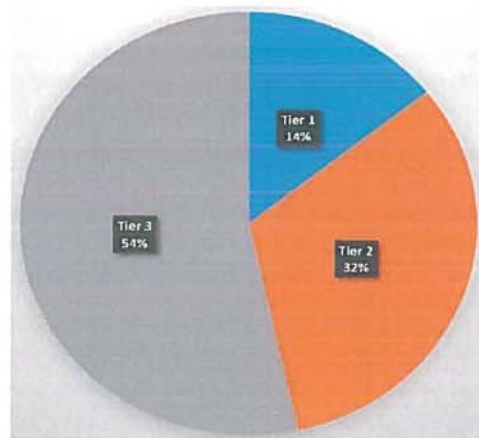


Figure 1: Curb Ramp Distribution by Tier

Using this system, CDOT created distribution reports that have been provided to the regional offices to assist with curb ramp prioritization planning. CDOT has also been able to calibrate the data based on urban areas which will assist regional personnel with better understanding the status of the curb ramps in their respective areas (Appendix R).

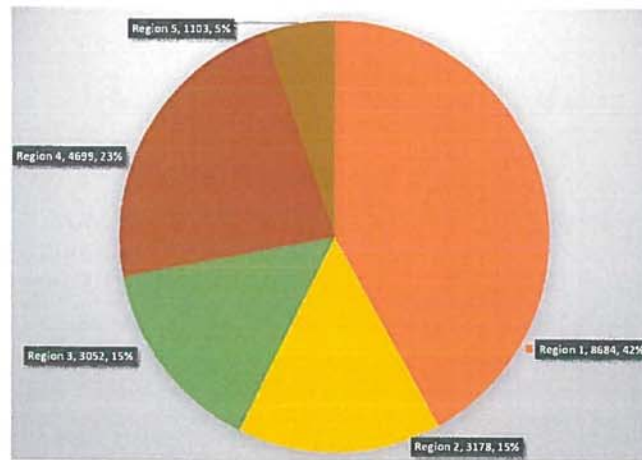


Figure 2: Curb Ramp Distribution by Region

4.3 Regional Prioritization Plans

4.3.1 Plan Requirements

CDOT is comprised of 5 Regional Offices (Appendix S). Each CDOT region has submitted a Curb Ramp Prioritization Plan (Appendix T) covering the second half of State Fiscal Year 2017 (beginning 1/1/17) and all of State Fiscal Year 2018 (7/1/17-

6/30/18). The Plans were approved by Regional Transportation Directors, the CDOT ADA Steering Committee and Regional Representative Team, and ultimately, CDOT's Chief Engineer. Regions received FY 17 funding in February 2017 and FY 18 funding on July 1, 2017, per the proposed region budget allocation.

Each Region's Curb Ramp Prioritization Plans includes the following information:

Overall Approach to Prioritization: How the Region intends to address curb ramp upgrades, including clarification on those to be addressed via the five-year program versus regular project delivery.

Clearances and Pre-Construction: Describe how the Region will proactively address clearances, including potential Right-of-Way (ROW), Historic, and Environmental considerations, especially in light of the recent Colorado Supreme Court Decision No.16SA75 which requires all ROW acquisitions to be approved by the Transportation Commission.

Achievement Goals: Describe regional goals regarding the number of curb ramps to be addressed and the timeline in which they will be addressed.

Anticipated Budget Expenditures: Provide anticipated budget expenditure schedule for FY 17 as well as FY 18.

Emerging Small Business (ESB) Requirements: In an effort to encourage participation from the small business community, each Region has developed a strategy to help ESB firms work on curb ramp projects. The CRBRC conducted a regional availability analysis of ESB firms for curb and gutter work and identified an opportunity for program integration, thus creating a classification of projects that is restricted to bidding by ESB Certified firms only.

ESB restricted projects are contracts valued at \$1 million or less (ideally \$100k - \$300k). Regions 1 and 4 will each be expected to advertise 2 ESB restricted projects, and Regions 2, 3, and 5 will each be expected to advertise 1 ESB restricted project; all projects must be advertised by June 30, 2018. For pre-construction services, region personnel will be expected to work with the CRBRC on an appropriate ESB goal.

4.3.2 Regional Prioritization Plan Summaries

CDOT recognizes the responsibility inherent in stewarding an \$85M program. Therefore the agency endeavors to take an intentional, collaborative approach to

implementation to ensure taxpayer dollars are maximized and consistently deliver functional assets. Because CDOT is in the early years of this unprecedented program, the methodology is evolving daily as problems are identified, solutions are developed and iterated, and the most effective path to execution is found. Therefore the Regional Prioritization Plans for FY17 and FY18 are deliberately open to allow for learning and change.

Each region will be required to update their plans and provide an evaluation of their progress to date before funds are allocated at the start of the fiscal year. As the team moves into FY 19 and FY 20, Regional Prioritization Plans will become more specific, identifying the project numbers and ramps to be addressed. By the time this Transition Plan is updated in FY 21, it is anticipated that CDOT will be able to report substantial progress on both functional accessibility numbers and the plan to upgrade remaining curb ramps.

Each region has its own unique characteristics that require it to approach this program differently, but most regions are hoping to address curb ramps with minimal clearance concerns in FY 17 and FY 18, while simultaneously beginning longer clearance processes where required. Below is a summary of each region's approach to the 18-month budget period, along with their target goals for that timeframe.

Region 1: Given that 40% of curb ramps are in Region 1, their team got started early on selecting a consultant to help with their program. They are therefore in the early stage of piloting some efficiencies that may be applied to other regions if successful. In particular, they are looking at the feasibility of an Intergovernmental Agreement with the City and County of Denver, which also has an active curb ramps program. As they learn more about the specificities required of such collaboration, the HQ team will help vet and distribute processes for statewide use.

Region 1 aims to address approximately 380 curb ramps in FY 17 and FY 18, about 30 of which will be part of an ESB-restricted bid package. They'll also begin looking at clearances for the remaining Tier 1 ramps (approx. 600) and begin the clearance and design process for ramps in the remaining categories where possible, aiming to get projects shelf-ready to address as funding becomes available.

Region 2: Region 2 secured its program consultant as this Plan was being written, and are also prioritizing their efforts based on clearance requirements. They are interested in taking a programmatic, risk-based approach that allows them to be efficient with their budget. They aim to address approximately 150 ramps in FY 18, about 50 of which will be part of an ESB-restricted bid package. They'll also address

clearances for the remaining Tier 1 ramps and pursue clearance for Tiers 2 and 3 as capacity allows.

Region 3: Region 3 has also recently secured its program consultant, and will be taking the same approach as Region 2. Because the communities in this region have very different populations and cultures, they plan to address the areas of highest pedestrian traffic first.

Region 4: Region 4 is taking a similar approach to Regions 2 and 3, but they plan to prioritize curb ramps in Tiers 1 and 2 in nine key urban areas during FY17 and FY18. They hope to have three ESB-restricted project packages available for advertisement in summer 2018.

Region 5: Because Region 5 has a more rural population than the rest of the state, they are also prioritizing Tiers 1 and 2, but only in five key urban areas. They are grouping ramps with no clearance concerns for design/build projects and grouping those with clearance considerations for design/bid/build packages. They plan to address approximately 150 ramps in FY17 and FY18, with two ESB-restricted packages. They also plan to have 5 bid packages ready by FY 19 to address the remaining 252 ramps in Tiers 1 and 2.

4.4 Program Funding

In July 2016, the Transportation Commission approved a plan to fund curb ramp improvements. This plan consists of \$85 million to be spent during the next five years focused on aggressively addressing curb ramp compliance (Appendix U). This funding plan is currently separated into program management, design services, and construction services. Initial funding will be focused on design services, including pre-construction items such as historic clearances and right-of-way acquisition. Updates to this plan will be presented annually to the Transportation Commission to determine if any alterations to the funding plan need to be made.

Using the Transportation Commission funding plan, CDOT has established a proposed regional budget allocation (Appendix V). This is used as a planning tool and may be altered as needed by the Regional Transportation Directors.

4.5 Program Overlap & Clearances

4.5.1 Right-of-Way

Average cost estimates for curb ramp construction are approximately \$2,500, which does not include markups, signals, removal, or right-of-way acquisition. When considering a curb ramp holistically, the cost can be as high as \$9,500.

Cost and Time Impact based on ROW

Type:	Relative Resources Costs	Schedule Impacts (Months)
100% in CDOT ROW	Low	1-2; depending whether ROW mapping is necessary
100% in Local Government ROW	Low to Moderate	3-4; assumes local agency will donate necessary ROW interest. ROW plans should specify parcel that local agency will donate necessary ROW.
100 % in Other Government ROW (e.g. USFS, BLM, State Land Board)	High	6-9 for small # of ramps on typical resurfacing project, i.e., minor rehab
100% in Private ROW	Moderate to High	9-10; (longer if condemnation is necessary)
100% unknown ownership	High	9-12; (longer if condemnation is necessary)

These estimates assume no condemnation is required; if condemnation is a necessity, three to nine months should be added to all time estimates.

It is also important to note that acquisition of any real property, including temporary easements, requires Transportation Commission authorization. Settlement approvals and condemnation requests require a second authorization form the Transportation Commission (after the acquisition authorization) which may impact the aforementioned timeline.

4.5.2 Historic

The CDOT Environmental Programs Branch (EPB) is developing a Section 106 Programmatic Agreement (PA) to address the statewide ADA 5-year program to

upgrade and replace curb ramps. The PA will assist in streamlining the compliance process for Section 106 of the National Historic Preservation Act of 1966, which requires federal agencies to evaluate the effects of their undertakings on historic properties, including their contributing elements. The agreement will specifically address the upgrade of curb ramps that are outside right-of-way (ROW) and/or within historic districts and require minor easements or ROW from adjacent properties that may be historic.

EPB is also working with FHWA-CO to evaluate ways to streamline the compliance process for Section 4(f) of the Department of Transportation Act, another federal regulation that protects historic and recreational properties, and requires avoidance, minimization, and mitigation of the physical use (e.g., easements, ROW needs, etc.) of eligible properties.

4.5.3 Pedestrian Signals

Pedestrian signals will be addressed during new construction/reconstruction projects, or in response to a request from the public. Upon the receipt of an Accessible Pedestrian Signal (APS) Request Form (Appendix W), CDOT shall determine who owns and/or maintains the intersection facility where the APS is being requested. The APS Request Form will then be forwarded either to the local municipality or to CDOT's local Regional Civil Rights Manager and Regional Traffic & Safety Office to collectively determine the eligibility for the installation of an APS. If approved, the APS devices shall be installed in pairs at the pedestrian crossing referenced on the APS Request Form.

If a non-accessible pedestrian signal already exists at the crossing in question, retrofitting will be automatically approved if the person requesting the APS has a visual impairment and regularly uses the crossing. When no pedestrian signal exists at the requested 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, then APS devices will be installed.

Designers are responsible for considering ADA accommodations throughout the design phase of a project. Included in this is a needs assessment for APS devices (Scoring Sheet NCHRP 3-62). The following factors should be considered when conducting an engineering study:

- A. Pedestrian Volumes (Warrant 4: Pedestrian Volume of the MUTCD)
- B. Potential demand for accessible pedestrian signals
- C. Traffic volumes during peak pedestrian crossing times
 - i. High/Low volumes of major/minor approaches
 - ii. High volume of turning vehicles
- D. Complexity of the traffic signal phasing
 - i. Split phasing
 - ii. Actuation
 - iii. Leading pedestrian intervals or exclusive pedestrian phasing
- E. Complexity of intersection geometry
 - i. Skewed crossings
 - ii. T-shaped intersections
 - iii. Wide crossing or Pedestrian Refuge

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

4.6 Design / Construction Variances

Because PROWAG requires designing and building compliant curb ramps to the maximum extent practicable, CDOT has created a Curb Ramp Variance Support Document (Appendix X) to be submitted with CDOT Form #464, Design Exemption Variance Request, in the event an engineer is unable to meet CDOT's Curb Ramp M Standards. Colorado has unique topography, environmental, and historic constraints that occasionally make it impossible to meet Standards, and these documents will be evaluated and signed by the CDOT Program Engineer to ensure the variance is valid and every effort has been made to design and/or construct with accessibility considerations in mind.

Support Documents will be attached to the relevant curb ramp record within the database, and will be incorporated into our reporting such that curb ramp geometrics outside of CDOT's measurement tolerance will not flag the ramp as non-compliant as long as the appropriate documentation is attached.

4.7 Inspection, Training & Ongoing Data Collection

CDOT has created a robust data collection and management process to ensure curb ramp geometrics are being documented by inspectors as projects are finalized. The team created a paper 11”x 17” As Built Form (Appendix Y) for field inspections to record measurements, but found it was cumbersome to use and created a quality control and reporting bottleneck. Therefore a more innovative solution was sought and collaboration occurred with the Department of Transportation Development (DTD) to configure Survey123 for ArcGIS to align with CDOT’s M Standards and PROWAG requirements.

Survey123 is an off-the-shelf app from ESRI designed to collect data in a simple, user-friendly format. It works on any device: desktop, laptop, tablet, or smartphone. The CRBRC’s ADA Title II Specialist, ArcGIS Database Consultant, and Communications Specialist developed a flow chart (Appendix Z) to translate the ArcGIS curb ramp data schema into basic logic to organize fields and provide initial quality assurance. CDOT’s GIS Applications Manager then configured a version of the app to match the flow chart, and has been working closely with the CRBRC team to ensure the supporting technology and all data are connected accurately.

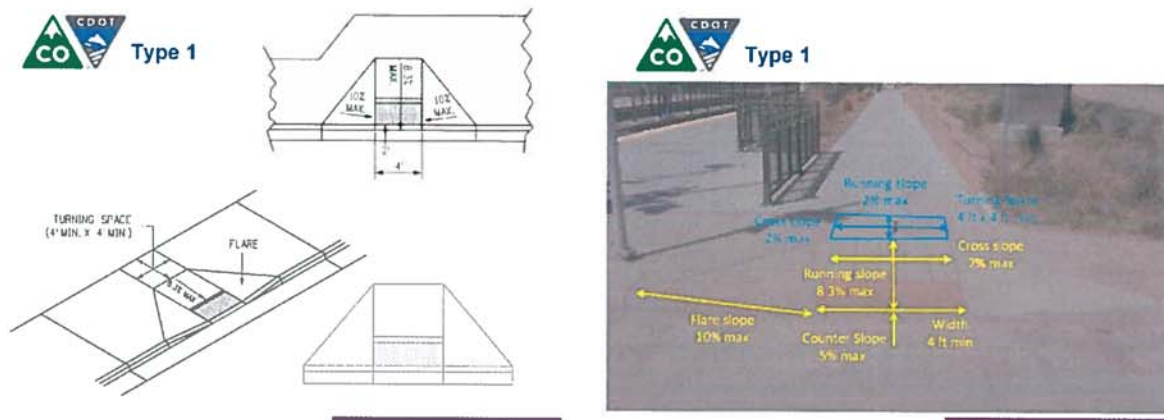
The screenshot shows the 'Curb Ramp' form in Survey123 for ArcGIS. At the top, there is a title bar with 'Curb Ramp' and a close button. Below the title bar, there is a message: 'Please complete all required fields with the appropriate information and measurements. Need help? Email dot_civilrights@state.co.us or call (720) 757-9234'. A red warning message reads: 'Caution: at the moment it is for testing purposes only.' The form is divided into sections. The first section is 'Curb Ramp Location and Information'. It contains the following fields: 'Curb Ramp ID *' with the value '_NaN_A1'; 'Select a Region *' with radio buttons for Region 1, Region 2 (selected), Region 3, Region 4, and Region 5; 'Primary State Highway *' with a list of options: 009A, 009B, 009C, 010A, and 012A; 'Reference Point' with a text input field; 'Primary Street Grade (%)' with a text input field; 'Secondary Route' with a text input field; and 'Secondary Street Grade (%)' with a text input field. A green checkmark icon is visible at the bottom right of the form.

The screenshot shows the 'Curb Ramp' form in Survey123 for ArcGIS, continuing from the previous screenshot. It contains the following sections: 'Are there obstructions on or around the curb ramp? *' with radio buttons for Yes (selected) and No; 'List any obstruction on or around the ramp' with a list of options: Fire Hydrant, Signal Pole (checked), Sign, Vegetation, Utility Pole, Utility Box (checked), and Other; 'What M-Standard Type of Curb Ramp Are You Inspecting? *' with radio buttons for Type 1, Type 2/4B, Type 3 (selected), Type 4A, and Type 5A, and a 'Modified' checkbox; 'Curb Ramp Information' with two questions: 'Is the curb ramp protected on the right side? *' (radio buttons for Yes, No) and 'Is the curb ramp protected on the left side? *' (radio buttons for Yes, No); 'Slopes & Dimensions' with three text input fields: 'Running Slope (%) *' with the value '8.1', 'Cross Slope (%)' with the value '2.1', and 'Counter Slope of Curb & Gutter (%) *'. A green checkmark icon is visible at the bottom right of the form.

CDOT's ADA Program Manager, Title II Specialist, and Communications Specialist recently completed training for construction inspection staff and consultants in each region, composed of three modules:

- 5-Year ADA Curb Ramps Program Overview
- Inspecting Curb Ramps for Accessibility
- Introduction to Survey123 and Field Practice

The first module offered a high-level overview of the program, including distribution, prioritization, funding, process, and roles and responsibilities, while the second module focused on taking consistent measurements for all types of curb ramps statewide. The third module was hands-on: getting Survey123 installed and people logged in, walking through the app as a group, then offering participants a chance to practice measuring and entering data with the Title II expert.



189 total training participants from across the state attended the six scheduled training sessions. The participants represented a variety of positions that will help integrate this information within their respective job duties, and the Communications Specialist intends to continue communications with this group and seek opportunities for participation in other existing programmatic trainings as appropriate. This training is already slated for a 1.5 hour presentation during a statewide Surveyor training in October, and there is hope that trend will continue. Finally, there have also been presentations given at the monthly Change Agent Network meeting, helping ensure the program is shared more broadly throughout CDOT.

The Communications Specialist and ADA Title II Specialist are also developing an inspection video that will demonstrate how to evaluate each type of curb ramp in

CDOT's M Standards. This video will be available on CDOT's website, and staff have already suggested using it at pre-construction meetings to ensure contractors are aware of CDOT's enhanced inspection methods. For those in the field with less access to digital connectivity, a pocket-sized field handbook is being produced that will help remind inspection staff of the correct ways to measure geometrics while inspecting.

The team will continuously update and improve Survey123. Features in consideration include automatically assigning inspections to the appropriate individual, automatically alerting Project Managers about inspection data outside of measurement tolerance, adding help icons to clarify geometrics and requirements, and creating data exports to help designers do initial assessments.

The paper form will continue to be available on CDOT's ADA website as a back-up and for those who are not able to use Survey123 or are not comfortable using Survey123. Training and inspection resources are also available on the ADA website to provide ongoing support for inspection staff.

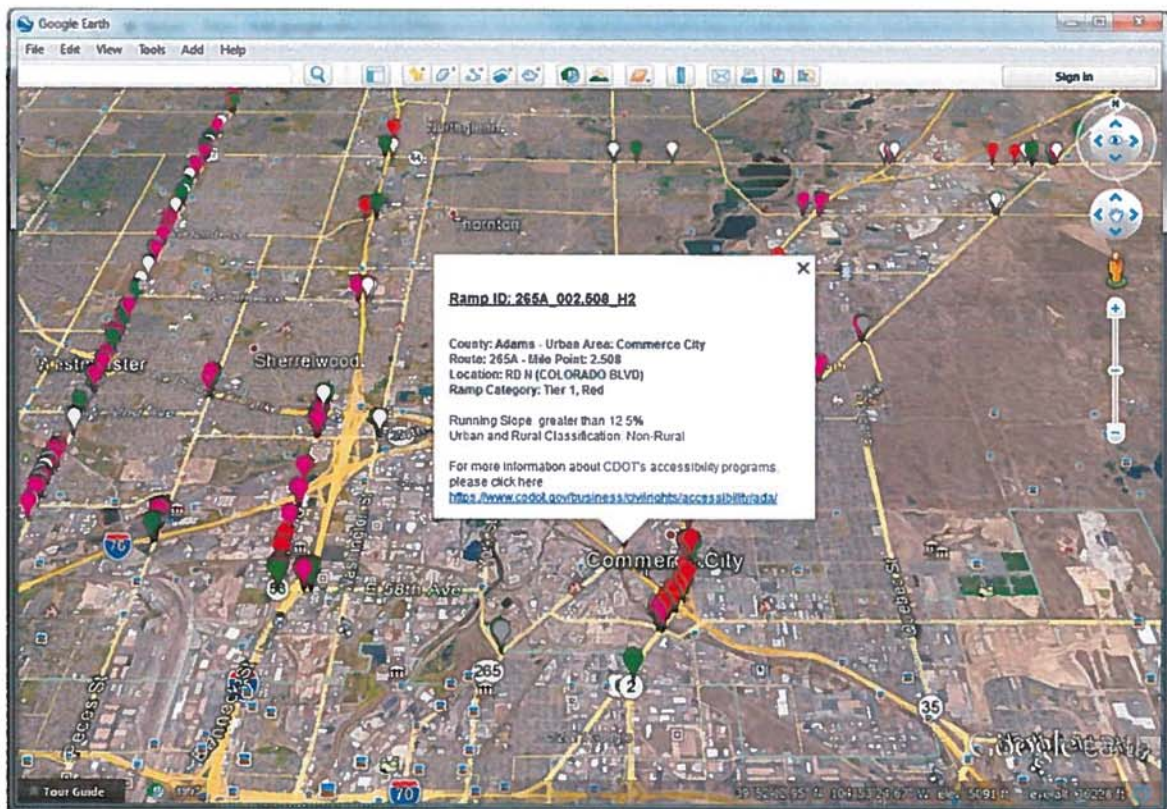
Section 5: Public Outreach and Input

In spring 2017, CDOT distributed a fact sheet about the draft Transition Plan (Appendix AA) to a list of 34 representatives from stakeholder organizations around the state. The messaging included a link to the Transition Plan on the website, where people can still provide feedback at their convenience. The messaging also provided an email address for offering input and a request to share the information with any interested parties.



While CDOT has not received any input via the web or email, the Accessibility section of CDOT's website has had more than 4,500 page views since beginning outreach efforts, as compared to just under 2,000 during the 6 months prior, a 125% increase.

CDOT's curb ramp inventory database is publicly accessible on the ADA Documents and Resources webpage. By clicking the link, users can see all 21,101 curb ramp records and full geometrics by database field. It is recognized that the public might prefer to see curb ramp data displayed by location and prioritization, so the team is currently developing Google Earth (KML) files that will sort ramps by county and display them by color, making the data accessible via a more user-friendly and familiar format.



To ensure an easy and direct route to the CRBRC to proactively address public concerns before they become complaints, CDOT has also created a Curb Ramp Request Intake Form (Appendix BB) and an Accessible Pedestrian Signal Request Form as referenced previously (Appendix W) that are posted on the CDOT website for citizens to fill out and submit as needed. Each submission will be evaluated by the ADA Title II Specialist who will work with the region representative to determine the appropriate response.

Of course, online avenues are only one method of offering the public a chance to review and give input. As such, public information sessions were scheduled in each region, coinciding with the inspection trainings that were provided to regional staff. Each session occurred from 4-5pm in an accessible space to ensure maximum potential for attendance. These sessions were announced by sending a flyer (Appendix CC) to 85 stakeholder representatives around the state, many of whom are ADA coordinators for local agencies. In all, there were six attendees in Denver at our North Holly location, eight in Greeley, and four in Durango (18 total). In response to a direct request from the community to offer another meeting in a different neighborhood of Denver, an additional session was scheduled in late August at the CDOT South Holly location. This presentation is posted on the CDOT website so that it may be viewed on-demand by the public, and the ADA Title II Specialist continues to be available for consultations should questions arise.

The team is also working with regional staff to connect with Metro Planning Organizations (MPOs) and Transportation Planning Regions (TPRs) 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 current plan to be on the fall/winter agendas for the Gunnison Valley TPR and San Luis Valley TPR. The CRBRC's Communications Specialist will continue to coordinate presentations at other group meetings around the state until each one has been contacted.

Finally, the CDOT team will incorporate an ADA component with project preconstruction and public meetings that involve curb ramp upgrades to ensure the public remains aware of CDOT's commitment to the pedestrian community and ways to contact CDOT and offer feedback when needed.

Section 6: 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 Transition Plan and the associated Curb Ramp Program are key components of reaching the Departmental goal and sets CDOT on a path toward providing equal access to all transportation facilities, services, programs, and activities. The Department is optimistic about its ability to bring all curb ramps up to standards over the next five years and will pursue the intentional efforts set forth in this Transition Plan to meet that objective.

Official Signature

Approved this 7 day of September, 2017.



Colorado Department of Transportation, Executive Director