



City of Edmond

ADA Self-Evaluation and Transition Plan



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Facility Reports

- Buildings
- Parks
- Signalized Intersections
- Sidewalk Corridors
- Transit Stops

1.0 Introduction

1.1 Legislative Mandate

The Americans with Disabilities Act (ADA) is a civil rights law that mandates equal opportunity for individuals with disabilities. The ADA prohibits discrimination in access to jobs, public accommodations, government services, public transportation, and telecommunications. Title II of the ADA also requires that all Programs, Services and Activities (PSAs) of public entities provide equal access for individuals with disabilities.

The City of Edmond has undertaken a comprehensive evaluation of its policies, programs, and facilities to determine the extent to which individuals with disabilities may be restricted in their access to City services and activities.

1.2 ADA Self-Evaluation and Transition Plan Development Requirements and Process

The City of Edmond is obligated to observe all requirements of Title I in its employment practices; Title II in its policies, programs, and services; any parts of Titles IV and V that apply to the City and its programs, services, or facilities; and all requirements specified in the 2010 ADA Standards and 2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG) that apply to facilities and other physical holdings.

Title II has the broadest impact on the City. Included in Title II are administrative requirements for all government entities employing more than 50 people. These administrative requirements are:

- Completion of a self-evaluation;
- Development of an ADA complaint procedure;
- Designation of at least one person who is responsible for overseeing Title II compliance; and
- Development of a Transition Plan to schedule the removal of the barriers uncovered by the self-evaluation process. The Transition Plan will become a working document until all barriers have been addressed.

This document describes the process developed to complete the evaluation of the City of Edmond's activities, provides policy and program recommendations, and presents a Transition Plan for the modification of facilities, public rights-of-way, and programs to improve accessibility, which will guide the planning and implementation of necessary program and facility modifications over the next 20 years. The ADA Self-Evaluation and Transition Plan is significant in that it establishes the City's ongoing commitment to the development and maintenance of policies, programs, and facilities that accommodate all of its citizenry.

1.3 Discrimination and Accessibility

Programmatic accessibility means that, when viewed in its entirety, each program is readily accessible to, and usable by, individuals with disabilities. Programmatic accessibility is necessary not only for individuals with needs related to mobility disabilities, but also to individuals with needs related to speech, cognitive, vision and hearing disabilities. The following are examples of elements that should be evaluated for barriers to accessibility:

1.3.1 Physical Barriers

- Parking
- Path of travel to, throughout and between buildings and amenities
- Doors
- Service counters
- Restrooms

- Drinking fountains
- Public telephones
- Path of travel along sidewalk corridors within the public rights-of-way
- Access to pedestrian equipment at signalized intersections

1.3.2 Programmatic Barriers

- Building signage
- Customer communication and interaction
- Access to public telephones
- Non-compliant sidewalks or curb ramps
- Emergency notifications, alarms, and visible signals
- Participation opportunities for City sponsored events

1.4 Ongoing Accessibility Improvements

City facilities, programs, services, policies, practices and procedures will continue to be evaluated on an ongoing basis, and the ADA Transition Plan should be revised to account for changes since the initial self-evaluation. An accessibility inventory of sidewalks and curb ramps on streets and near City facilities will be completed, and an approach will be put in place to remove all identified barriers. This Plan will be posted to the City's website for review and consideration by the general public. In addition, notice will be provided to indicate the Plan's existence in all official and unofficial City publications.

1.5 City of Edmond's Approach

The purpose of the Transition Plan is to provide the framework for achieving equal access to the City of Edmond's programs, services and activities within a reasonable timeframe. The City's elected officials and staff believe accommodating disabled persons is essential for good customer service, for the quality of life Edmond residents seek to enjoy and for effective governance. This Plan has been prepared after careful study of all of the City's programs, services and activities.

The City of Edmond shall make reasonable modifications in policies, practices, or procedures when they are necessary to avoid discrimination on the basis of disability, unless the City can demonstrate that making the modifications would fundamentally alter the nature of the service, program, or activity. The City of Edmond will not place surcharges on individuals with disabilities to cover the cost involved in making programs accessible.

2.0 Public Outreach

The City provided opportunities to receive input from the public concerning this Transition Plan. The following section details these conversations with the public.

2.1 Public Workshop

The City hosted two public workshops on April 30, 2015 at 2:00 PM and 6:00 PM to provide a summary of the Transition Plan and receive feedback on the Transition Planning process and any other concerns related to accessibility. The questions and comments received at the workshops are summarized below.

- Q: Are there any water access issues to get people with disabilities to the water at Arcadia Lake? Does part of the Transition Plan enable someone in a vehicle to drive down to the water to be loaded into a boat?
A: Docks and boat slips are required to comply. UCO at Edmond Park – installing accessible docks. If you operate boats, there are passenger vehicle requirements.
- Q: The Endeavor Games (multi-disability event) were held recently and surveys were distributed for feedback. New crosswalks off campus were great but there were concerns about getting over to the Target shopping center and restaurants around campus. Specific locations will be emailed to Phil. One example is at the location where the sidewalk ends on Bowman near the fire station and you are forced to cross road.
A: These areas will be elevated as a priority issue in the Transition Plan.
- There was praise for the APS units at Ayers and University Dr. UCO has a large population of students with a visual disability.
- Q: Was there a Transition Plan in place previously?
A: No, this is a new Plan that was started within the past 10 months.
- Q: How is the City prioritizing issues? City programs are not always accessible or accommodating (e.g. basketball in the Endeavor Games at the Wellness Center, and in general, because gyms are not accessible)
A: The severity of the issue and proximity to pedestrian attractions, as well public input, are used to prioritize the issues; A Grievance Procedure was also implemented for submitting issues.
- Q: Did the City send out a survey to the residents?
A: Surveys are not a requirement of the Transition Plan process. People do not always want to participate in self-identifying surveys, so the results can vary.
- Q: Are there any plans in the future for accessible non-paved trails?
A: Not to Phil's knowledge but he will talk to Craig Dishman, Parks Director. The Outdoor Developed Areas Guidelines will be coming out soon to provide guidance for installation of hike and bike trails.
- Q: Was the website evaluated as part of this project? What needs to change to make the website information accessible?
A: The website was not evaluated as part of this project. The Consultant team will send requirements for website compliance.

- Q: When is the Transition Plan going to be approved?
A: The Plan is going to City Council for approval on July 13, 2015.
- Q: Why are curb ramps on the radius of corners versus perpendicular curb ramps still installed?
A: Edmond is trying to avoid this design in new construction. The State and Federal governments are always discouraging this curb ramp treatment. Diagonal curb ramps are only allowed as a last resort now instead of first choice like they used to be.
- Q: How is the disability community going to be able to review the document before the City Council approves the Transition Plan?
A: The Transition Plan is a living document and input can be provided on an on-going basis. The City would like to form an Advisory Committee with representatives from the disability community to receive input on a regular basis.
- Q: Who is going to pay for the proposed repairs?
A: The City will pay for all improvements.
- Q: What is the difference between Title II and Title III?
A: Title II entities (e.g. City of Edmond) receive federal funds and are required to have an ADA Transition Plan. Title III entities are privately funded and are not required to have an ADA Transition Plan (e.g. gas stations, restaurants, Home Depot).
- Q: If you are putting in an addition to a home, are ramps required?
A: Private homes are not covered under the ADA.
- Q: I've learned a lot from this presentation (e.g. Title II vs. Title III requirements). As far as sidewalks, are all intersections required to have sidewalks and curb ramps?
A: Once an accessible route is installed (e.g. sidewalks), it is required to be maintained in an accessible condition. Curb ramps are required where sidewalks cross a curb and all curb ramps must be compliant.
- Q: How do we file a grievance if the issue is not City property?
A: Send your grievance to Phil Jones with the City and he will determine who is responsible for fixing the issue(s).
- Q: A meeting attendee is deaf and part of the disabled community. He works at Tinker Air Force Base and several ramps on the Base were non-compliant. He contacted representatives for the Air Force Base and they contacted the Department of Defense to get the ramp improvements made. He and several others working at the Base had to help people in wheelchairs get up the ramps until the construction was completed. How can a person with disabilities, specifically those in a wheelchair, seek shelter during a storm or other emergency?
A: Emergency preparedness is being looked at as part of this project and also on a statewide level.
- Q: Do you work with 504 Plans?
A: Yes, a 504 Plan is similar to an ADA Transition Plan, but it is a different law. ADA does not allow punitive or compensatory damages, but 504 does.

- Q: When police officers stop a deaf person for a traffic violation, deaf people are currently showing officers cards indicating they need an interpreter. Oklahoma Highway Patrol had an issue with a deaf man and the patrol thought the man was reaching for a gun, when he was really reaching for the card. The man was arrested. What's being done about this?
A: For the City of Edmond, Staff training was provided for City staff in contact with the public.
- A lot of deaf people are now using video phones and it is a great communication device. The City may want to consider purchasing a video phone but also keep a TTD/TTY phone.

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3.0 Self Evaluation and Summary of Findings

3.1 Programs, Procedures, and Policies

The City of Edmond has set up an ADA Coordinator “system” to better cover the needs of employees and citizens with disabilities. In addition to the City’s ADA Coordinator, the City has established an ADA Coordinator Liaison within each department, or department location who reports to the City’s ADA Coordinator regarding the needs of their department and the programs for which that department is responsible. The City’s ADA Coordinator, or designee, will follow-up with each departmental ADA Liaison to coordinate the implementation of plans, programs, policies and procedures.

In those situations where a program, procedure, or policy creates a barrier to accessibility that is unique to a department or a certain program, the ADA Coordinator, or designee, will coordinate with the department head to address the removal of the barrier in the most reasonable and accommodating manner.

Services and programs offered by the City of Edmond to the general public must be accessible. Accessibility applies to all aspects of a program or service, including advertisement, orientation, eligibility, participation, testing or evaluation, physical access, provision of auxiliary aids, transportation, policies, and communication.

The City does not have to take any action that it can demonstrate would result in a fundamental alteration in the nature of a program or activity, would create a hazardous condition for other people, or would represent an undue financial and administrative burden. This determination can only be made by the ADA Coordinator or designee and must be accompanied by a written statement of the reasons for reaching that conclusion.

The determination that an undue burden would result must be based on an evaluation of all resources available for use. If a barrier removal action is judged unduly burdensome, the City must consider other options for providing access that would ensure that individuals with disabilities receive the benefits and services of the program or activity.

The City may achieve program accessibility by a number of methods:

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

When choosing a method of providing program access, the City should endeavor to give priority to the one that results in the most integrated setting appropriate to encourage interaction among all users, including individuals with disabilities. In compliance with the requirements of the ADA, the City provides equality of opportunity but does not guarantee equality of results.

3.1.1 Departmental Surveys

The self-evaluation of the City’s services, programs, and activities required and involved the participation of every City department. The City conducted meetings with department ADA Liaisons and Consultant team throughout the duration of the project and distributed an electronic survey to the following City departments and entities to complete:

City Departments	
Citylink	Animal Welfare
Boards and Commissions	Building code inspections
Capital Improvement	City Attorney
City Council	City Treasurer
Community Image	Convention and Visitors Bureau
Downtown Community Center	Electric
Emergency Management	Engineering
Field Services	Financial Services/City Clerk
Fire Department	Human Resources
Information Technology	Marketing & Public Relations
Municipal Court	Parks and Recreation
Planning and Zoning	Police
Public Works	Purchasing
Risk Management	Senior Center
Solid Waste and Trash Collection	Urban Forestry
Utility Customer Service	Vehicle Maintenance
Water Resources	KickingBird Golf Club

The departmental surveys were developed to acquire basic information on how a person with a disability would be able to participate in each program, service, or activity offered by each department. The surveys included a review of the following information:

- Program or service description for each program/service offered by each department.
- Characterization of program or service participants, along with a description of any participation requirements, and any adaptations made to assist persons with disabilities.
- List of facilities where program or service takes place.
- Information about the training provided or available to those administering the programs.
- Information regarding transportation procedures and methods used to accommodate persons with disabilities.
- Information regarding communication procedures for audio/visual presentations, telephone communication, participant notifications, and documents/publications, including any modifications or equipment used to accommodate people with disabilities.
- Information regarding 9-1-1 services for people with sensory impairments.
- Description of emergency evacuation procedures designed to accommodate people with disabilities.
- Information regarding automated electronic equipment used in a program or service accessible to all participants.
- Methods used to ensure that all public meetings relating to a program or service are designed to accommodate persons with disabilities.

Copies of the surveys for specific City departments are included in the Appendix. In addition to electronic surveys, follow-up interview questions were distributed via e-mail to specific departments in order to obtain additional information regarding certain survey responses. The follow-up questions and responses are also summarized in the survey pages provided in the Appendix.

Self-Evaluation Findings:

Upon review of the department survey responses, it was clear that training for staff in contact with the public was needed and that most departments were aware of some forms of communication modification, such as paper and pencil or a reader, but were unaware of all of the additional options that can be offered or where to get them if they need them.

Recommended Actions

A formal process for requesting modifications regarding employment, programs, or activities should be developed and should include a record keeping process of the modifications requested and the accommodation provided.

3.1.2 Public Meetings

Many City departments are responsible for holding public meetings. Examples of public meetings include open houses for public projects, City Council meetings, and the following list of Boards, Commissions and Committees:

City Boards, Commissions, and Committees	
Alarm Review Board	Edmond Planning Commission
Board of Adjustment / Appeals	Edmond Public Transportation Committee
Capital Projects & Financing Task Force	Employee Pension & Retirement Board
Central Edmond Urban Development Board	Finance / Audit Committee
Citizens Participation Committee	Guthrie-Edmond Airport Board
Community Agency Review Commission	Kicking Bird Golf Club Advisory Board
Convention & Tourism Advisory Board	Parks & Recreation Advisory Board
Edmond Bicycle Committee	Public Works Committee
Edmond Community Policing Leadership Council	Special Events Committee
Edmond Economic Development Authority Board	Stormwater Drainage Advisory Board
Edmond Fish & Game Commission	Urban Forestry Commission
Edmond Historic Preservation Trust Committee	Edmond Visual Arts Commission

The Boards, Commissions, and Committees were reviewed to determine how a person with a disability would be able to participate on each board, ensure board meetings are held in an accessible location, and determine the process for getting on a board to ensure people with disabilities have an equal opportunity to participate in civic life. To obtain this information, electronic surveys were distributed to each entity and included the following questions:

- How are meeting notices distributed?
- Do the meeting notices include information on how to request auxiliary aides?
- Where are the meetings held?
- To your knowledge, is the facility accessible by people with disabilities?

Self-Evaluation Findings:

All Boards, Commissions, and Committees have a one-page online application form that requests basic personal information, such as name and address, and to what board, commission, or committee they are applying for. No issues were identified with the application itself. There is no information provided about an alternate application process, so an alternate process should be in place for those unable to apply online.

Public meetings are generally held in locations that are reasonably accessible to persons with mobility impairments. All public meeting notices and agendas include the availability of accessibility modifications. Current agendas and notices state the following:

The City of Edmond ensures that no person or groups of persons shall, on the grounds of race, color, national origin, sex, age, religion, disability/handicap, or income status be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any and all programs, services, or activities administered by the City, its sub-recipients, and contractors. To request an accommodation, please contact Phil Jones, ADA Coordinator by phone: 405-359-4518, TDD: 405-359-4702, or email: phil.jones@edmondok.com.

ALTERNATE:

The City of Edmond encourages participation from all its citizens. To request an accommodation due to a disability please allow at least 48 hours prior to the scheduled meeting. Contact the ADA Coordinator by phone: 405-359-4518, TDD: 405-359-4702, or email: ADACoordinator@edmondok.com

The City of Edmond is in the process of developing an on-going advisory board made up of citizens with disabilities and citizens who represent various disability groups. This board will help ensure the most pertinent access issues are dealt with in proper priority.

Recommended Actions

Recommendations for the Boards, Commissions, and Committees include the following:

- Publicize the availability of American Sign Language (ASL) interpreters in all meeting announcements. Include the following notice in all meeting publicity:

"Translators, American Sign Language interpreters and assistive listening devices for individuals with hearing disabilities will be available upon request. To request interpreters, assistive listening devices, or another modification not listed above, please make your request at least 48 hours prior to the meeting by contacting Phil Jones, ADA Coordinator by phone: 405-359-4518, TDD: 405-359-4702, or email: phil.jones@edmondok.com."

- Schedule public meetings in accessible locations whenever possible. An accessible location should at least contain, but is not limited to, the following: accessible restrooms, wheelchair access, accessible parking, an accessible route, temperature control, and the ability to provide access to fresh air for persons with chemical sensitivities.
- When a fully accessible site is not available, then make reasonable modification so that an individual with a disability can participate.
- Make information available to City staff on the types of modification requests that may be made by persons with different types of disabilities. Provide information about auxiliary aids such as different types of assistive listening systems, sign language interpreters, readers, descriptive services, and other assistive technologies like "real-time captioning."
- Display a notice on meeting agendas indicating the availability of accessibility modifications.
- Provide agendas in alternative formats, when requested.

- Provide flexibility in the time limit on speaking for individuals with communication difficulties.
- Provide assistive listening devices at public meetings, when requested.
- Maintain a list of on-call American Sign Language interpreters who may be brought to meetings to assist individuals with hearing impairments.
- Develop a checklist for creating accessible meetings and selecting accessible meeting spaces, and make the list available to all City departments and programs.
- Prepare a list of already accessible meeting spaces to facilitate the scheduling of meetings and/or the relocation of meetings upon request.

3.1.3 Printed Information

In order to meet the ADA's communication standards, City departments must be able to provide information in alternative formats such as using easy-to-understand language, Braille, large-print format, audiotape, or computer disk.

Self-Evaluation Findings:

Many City departments and offices produce printed information that is available to the public.

None of the departments seemed to understand their responsibility to distribute information about how a participant could obtain printed information in alternate formats. A few departments have produced printed information in large print.

Most registration forms, permits, and waivers are only available in written form. There is inconsistency as to the availability of alternative formats of its documents such as large-print, audio tapes or readers for individuals who are unable to read the materials.

Recommended Actions

- Provide information to each City department on how to produce printed information in alternative formats for persons with various disabilities to ensure that requests are handled in a uniform and consistent manner. Include in that, the list of available resources for providing the services.
- Publicize the City's commitment to provide program information in alternative formats on an individual basis as requested, including large-print media and taped announcements available over the telephone.
- If required, ensure the uniformity of charges for a publication, for all formats of that publication.
- Include the following notice on all materials printed by the City that are made available to the public:
"This publication can be made available in alternative formats such as Braille or large print, by contacting Phil Jones, ADA Coordinator by phone: 405-359-4518, TDD: 405-359-4702, or email: phil.jones@edmondok.com. Please allow 48 hours for your request to be processed."
- Identify and have available a list of interpreters, readers, etc. to be used to accommodate requests for these services.
- Handle all requests for other alternative formats or lengthy documents on an individual basis.

- Provide program, facility, permits, and reservation information in a variety of formats upon request (for example, in large-print format for persons with visual disabilities or in simple language for persons with cognitive disabilities). Provide programmatic changes (e.g., staff assistance), upon request to assist in filling out forms or when alternative formats are unavailable or infeasible.
- Provide an accessible permit, reservation, or registration system in a variety of formats. For example, provide Telephone Device for the Deaf (TDD) service for applications, reservations, and general queries.
- Produce meeting agendas and other public information distributed at meetings in alternative formats when requested.

3.1.4 Programs

Several Community Special Programs under Fire Services, Police Services, Citylink, and the Parks and Recreation Department were reviewed as part of the Transition Plan. The Fire Services, Police Services, and Citylink programs were reviewed to determine the eligibility requirements for participation, determine how a citizen with a disability would be able to participate, and how alternative measures could be taken if any area of the program cannot be made accessible.

The Parks and Recreation Department has many different programs for citizens. A master "Standard Operating Procedures" (SOP) should be in place to identify how each program can handle participants with varying disabilities. An up-to-date SOP will identify potential problems with each program from registration through participation. It is important to ensure participants with disabilities have full participation in events hosted on land owned by the City, by putting the responsibility for accessibility on the vendor or group leasing the property from the City.

The Citylink Access Paratransit Service (CAPS) program was reviewed on eligibility for the program but was not reviewed in terms of functionality. Paratransit Service is a curb-to-curb public transportation service for people with disabilities who are unable to use the mainstream Citylink buses. Paratransit is a shared-ride service operated with modern, accessible vehicles.

The Sidewalk Partnership Program allows for repairing citizen sidewalks. An "Eligibility" form is required and, like most forms, is not offered in alternate formats. This program is a good candidate for merging with the ADA Transition plan process.

Self-Evaluation Findings

Besides the CAPS and Sidewalk Partnership programs noted above, most of the programs reviewed do not have specific eligibility requirements, so these programs were determined to be accessible with a few exceptions. A lack of contact information for auxiliary aides and accommodations, which is required, was the most common issue identified in the programs.

Recommended Actions

The Sidewalk Partnership Program is a good candidate to be merged with the ADA Transition Plan process. The criteria for being 'eligible' for the program exceeds what is considered a violation under the ADA, but could be further developed as a process of notification for sidewalk violations.

A complete listing of programs reviewed and associated evaluation findings can be found in the Appendix.

3.1.5 Procedures

The Emergency Management Plan was reviewed as part of this project. The Emergency Management Plan has only a brief mention of handling people with special needs; however, details need to be provided on how people with disabilities will be accommodated. The Emergency Management Plan was reviewed to determine who will handle citizens with disabilities, how much training this person has had, how will medications be stored, how will service animals be handled, and any other relevant items.

Self-Evaluation Findings

The City Wide Emergency Management Plan includes persons with disabilities but does not provide detailed information regarding accessible shelters or the evacuation procedures relating specifically to persons with disabilities. There is a process in place for an individual to register their home shelters, which alerts rescuers where to look, but no recommendations for public shelters.

There is also a fairly detailed section for people with disabilities to be prepared for potential emergencies, but no detail on how the City will be prepared to handle people with disabilities should the need arise.

Citizens can register for the "CodeRed" service, which alerts them to potential dangers in the area, but there is no mention of how the City will respond to known special requests.

Recommended Actions

Should the City designate and operate any shelters on their own, a process must be developed to evaluate any potential shelters for compliance. Additional detail should be added to the plan for handling citizens with a variety of special needs.

3.1.6 Policies

The Human Resources Personnel Policy Manual was reviewed to ensure discriminatory language is not used and employees with disabilities have an equal opportunity at employment. Job descriptions were not reviewed as part of this project, but should be broken down into "essential job functions" and "secondary job functions" and reviewed for discriminatory language.

Self-Evaluation Findings

The Human Resources Personnel Policy Manual does not reference an ADA Coordinator or any process regarding complaints specifically involving discrimination relating to a disability. There is a 'grievance' process in place, but it pertains specifically to employees and the information does not filter to a single point of contact.

Recommended Actions

The Human Resources Personnel Policy Manual must include reference to the developed ADA Grievance Procedure, ADA Grievance Form, and ADA Coordinator.

3.1.7 City Building Codes

City Building Codes were reviewed to ensure there is no discriminatory language and to ensure there are no codes that could be interpreted as discriminatory. The City of Edmond has officially adopted the PROWAG guidelines as their standard for the public rights of way. Additionally, they use the following Building Codes:

- ICC International Building Code (IBC) 2009
- ICC International Fire Code (IFC) 2009
- ADAAG ADA Accessibility Guidelines 2010
- ANSI American National Standards A117.1 2003
- ICC International Property Maintenance Code 2009
- ICC International Residential Code (IRC) 2009
- ICC International Plumbing Code (IPC) 2009
- ICC International Fuel Gas Code 2009
- ICC International Mechanical Code (IMC) 2009
- ICC Administrative Provisions of Electric Code 2011
- NEC National Electric Code (NEC) 2011

City Ordinances were reviewed to ensure there is no discriminatory language and to ensure there are no ordinances that could be interpreted as discriminatory. The following chapters of the City's municipal code were evaluated during this process:

- Title 16: Building Codes
- Title 17: Fire Codes
- Title 22: Power Generation and Storm Shelters

Self-Evaluation Findings

The Storm Shelter requirements found in Title 22 specifically say:

"In-Ground storm shelters constructed in the rear or side yard behind the front elevation of the house shall not exceed five feet in height for any projection of the structure."

The concern is that this limits a storm shelter from being accessible. The doors to accessible in ground storm shelters are generally over 5' high.

Recommended Actions

The Storm Shelter requirements should be revised to allow for all types of accessible storm shelters.

In general, none of the ordinances reviewed indicate the responsibility of the City to make reasonable accommodations for Board Members, Council Members or Commissioners who are disabled.

New ordinances should be evaluated with a critical eye toward accessibility and existing ones should be re-reviewed and updated accordingly.

3.1.8 Design Standards Review

The following design standards were reviewed for consistency with the current 2010 ADA Standards, Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG), and the 2010 Texas Accessibility Standards (TAS):

- Waterline
- Sanitary Sewer
- Roadway
- Driveway construction
- Sidewalk details and drawings
- Traffic

Self-Evaluation Findings

Issues identified within the Design Guidelines or Technical Specifications that were found were forwarded to the City for resolution.

The City has officially adopted the 2011 PROWAG document as the standard for Public Rights of Way.

Recommended Actions

Table 1 summarizes the Design Standard issues and associated recommendations.

Table 1. Summary of Design Standard Issues

Detail	Sheet	Issue	Recommendation
N/A	SS-01 – SS-14	No Comments	
N/A	ST-11	CONTRACTION JOINT	When joint is within an accessible route, ensure the difference in elevation is 1/4" or less and the width is 1/2" or less.
N/A	ST-12	LONGITUDINAL JOINT	When joint is within an accessible route, ensure the difference in elevation is 1/4" or less and the width is 1/2" or less.
N/A	ST-13	TONGUE & GROOVE & OR / KEYED LONGITUDINAL JOINT	When joint is within an accessible route, ensure the difference in elevation is 1/4" or less and the width is 1/2" or less.
N/A	ST-14	EXPANSION JOINT	When joint is within an accessible route, ensure the difference in elevation is 1/4" or less and the width is 1/2" or less.

Table 1. Summary of Design Standard Issues (cont.)

Detail	Sheet	Issue	Recommendation
N/A	ST-15	JOINT REHABILITATION	When joint is within an accessible route, ensure the difference in elevation is 1/4" or less and the width is 1/2" or less.
Section BB	DW-01	Driveway Slope	Add to note "...Drive may increase or decrease from this point to property line." to read "...Drive may increase or decrease from this point to property line, but may not slope more than 1:48 in the sidewalk area."
Plan	DW-01	Driveway Slope	Add note "Sidewalk may not have a cross slope of more than 1:48."
Section CC	DW-02	Driveway Slope	Add to note "...Drive may increase or decrease from this point to property line." to read "...Drive may increase or decrease from this point to property line, but may not slope more than 1:48 in the sidewalk area."
Plan	DW-02	Driveway Slope	Add note "Sidewalk may not have a cross slope of more than 1:48."
Notes	SW-02	Sidewalk Expansion Joint Location Detail	Ensure that rings and lids are flush and that brick mailbox does not reduce the accessible route.
Notes	SW-02	Detail of Joint and Sections C-C and D-D	Ensure that cross slope is less than 1:48.
Title	SW-03	Sidewalk Expansion Joint Location Detail	This detail is for a ramp up or down to a driveway. Recommend the title be Driveway Ramp.
N/A	SW-03	Wheelchair Ramp Profile	If the sidewalk is lower than the driveway it will fill with water.
Notes	SW-03	Isometric Plan	Cross slope in this area is not defined.
Notes	SW-03	Isometric Plan	Modify the note to clarify that max slope is 1:12 as long as it is 6' or less in length.
Type A	SW-04	Plan and Type A isometric	Indicate the required landing area at the top of the curb ramp.
Type A	SW-04	Plan and Type A isometric	Indicate the required 36" wide accessible route must not be reduced by the ramp.
Type A	SW-04	Plan and Type A isometric	Counter slope at the bottom of the ramp cannot exceed 1:20.
Type A	SW-04	Plan and Section A-A	Minimum ramp width identified as "Varies" must be at least 48".
Type B	SW-05	Entire Sheet	Return curbs are preferred over flares which exceed 1:10 slope.
Type B	SW-05	Entire Sheet	Where obstructions exist which preclude the use of a Type A ramp, provide rails or other site furnishing to block access to the sides of the ramp.
Type B	SW-05	Entire Sheet	Minimum ramp width identified as "Varies" must be at least 48".

Table 1. Summary of Design Standard Issues (cont.)

Detail	Sheet	Issue	Recommendation
Type C	SW-06	Entire Sheet	Diagonal ramps are highly discouraged. Two Type A ramps are preferred to direct the user to a route within the crosswalk towards the opposing ramp.
Type AB	SW-07	Entire Sheet	Where obstructions exist which preclude the use of a Type A ramp, provide rails or other site furnishing to block access to the sides of the ramp.
Type AB	SW-07	Entire Sheet	Return curbs are preferred over flares which exceed 1:10 slope.
Through Flume WCHR Ramp	SW-08	Entire Sheet	Install a non-skid plate over the flume so the disabled person does not have to wade through water.
Design 1	C1-05	Entire Sheet	Ensure these do not occur within a crosswalk or sidewalk.
DESIGN 2 & 3 DOUBLE & MULTIPLE GRATE	C1-06	Entire Sheet	Ensure these do not occur within a crosswalk or sidewalk.
DESIGN 2 & 3 DOUBLE & MULTIPLE GRATE	C1-07	Grate Inlet	Ensure these do not occur within a crosswalk or sidewalk.
DESIGN 1 TYPE "A" INLET FRAME	CF-02	Grate Inlet	Ensure these do not occur within a crosswalk or sidewalk.
DESIGN 2 & 3 TYPE "B" INLET FRAME	CF-03	Grate Inlet	Ensure these do not occur within a crosswalk or sidewalk.
DESIGN 3 TYPE "C" INLET FRAME	CF-04	Grate Inlet	Ensure these do not occur within a crosswalk or sidewalk.
TRENCH INLET TYPE "TR" INLET FRAME	CF-05	Grate Inlet	Ensure grate complies with no opening wider than 1/2" high if these grates occur within a sidewalk.
CAST IRON GRATE TYPE "VG-F" & "T"	CG-02	Grate Inlet	Ensure these do not occur within a crosswalk or sidewalk.
CAST IRON GRATE TYPE "RVG-F" & "T"	CG-03	Grate Inlet	Ensure these do not occur within a crosswalk or sidewalk.
SECTIONS & DETAILS	GI-03	Grate Inlet	Ensure these do not occur within a crosswalk or sidewalk.

Table 1. Summary of Design Standard Issues (cont.)

Detail	Sheet	Issue	Recommendation
TYPE "1" GRATE	GD-02	Grate Inlet	Ensure these do not occur within a crosswalk or sidewalk.
TYPE "2" GRATE	GS-03	Grate Inlet	Ensure these do not occur within a crosswalk or sidewalk.
DESIGN 2 & 3 DOUBLE & MULTIPLE GRATE	C1-07	Grate Inlet	Ensure these do not occur within a crosswalk or sidewalk.
DESIGN 1 TYPE "A" INLET FRAME	CF-02	Grate Inlet	Ensure these do not occur within a crosswalk or sidewalk.
DESIGN 2 & 3 TYPE "B" INLET FRAME	CF-03	Grate Inlet	Ensure these do not occur within a crosswalk or sidewalk.
DESIGN 3 TYPE "C" INLET FRAME	CF-04	Grate Inlet	Ensure these do not occur within a crosswalk or sidewalk.
TRENCH INLET TYPE "TR" INLET FRAME	CF-05	Grate Inlet	Ensure grate complies with no opening wider than 1/2" high if these grates occur within a sidewalk.
CAST IRON GRATE TYPE "VG-F" & "T"	CG-02	Grate Inlet	Ensure these do not occur within a crosswalk or sidewalk.
CAST IRON GRATE TYPE "RVG-F" & "T"	CG-03	Grate Inlet	Ensure these do not occur within a crosswalk or sidewalk.
SECTIONS & DETAILS	GI-03	Grate Inlet	Ensure these do not occur within a crosswalk or sidewalk.
TYPE "1" GRATE	GD-02	Grate Inlet	Ensure these do not occur within a crosswalk or sidewalk.
TYPE "2" GRATE	GD-03	Grate Inlet	Ensure these do not occur within a crosswalk or sidewalk.
SIGNAL PLACEMENT W/ LEFT TURN	PMD-02	Pole Placement	Sidewalk is not specifically indicated, but if one is present, ensure that pole placement does not obstruct assessable route.
SIGNAL PLACEMENT W/O LEFT TURN	PMD-03	Pole Placement	Ensure that pole placement does not obstruct assessable route.
SIGNAL PLACEMENT W/O LEFT TURN	PMD-03	Crosswalk Button	A 30" x 48" level area is required to be centered on the button. Dimension says 2' to 5' from pole to back of curb. Suggest button either be moved to the other side of the pole or this dimension be changed to 4' to 5'.

Table 1. Summary of Design Standard Issues (cont.)

Detail	Sheet	Issue	Recommendation
SIGNAL PLACEMENT W/O LEFT TURN	PMD-03	Pedestrian Signals	Are audible signals provided for the visually impaired?
SIGNAL PLACEMENT W/O LEFT TURN	PMD-03	Pedestrian Signals	Are audible signals provided for the visually impaired?
SIGNAL PLACEMENT PED. CROSSWALKS	PMD-04	Ramp	Diagonal ramps are highly discouraged. Two Type A ramps are preferred to direct users toward the opposing ramp on a route which will keep them within the crosswalk.
SIGNAL PLACEMENT PED. CROSSWALKS	PMD-04	Pole Placement	Ensure that pole placement does not obstruct assessable route.
SIGNAL PLACEMENT PED. CROSSWALKS	PMD-04	Crosswalk Button	A 30" x 48" level area is required to be centered on the button. Dimension says 2' to 5' from pole to back of curb. Suggest button either be moved to the other side of the pole or this dimension be changed to 4' to 5'.
SIGNAL PLACEMENT PED. CROSSWALKS	PMD-04	Pedestrian Signals	Are audible signals provided for the visually impaired?
PUSH BUTTON POLE	PMD-07	Pole Placement	Ensure that pole placement does not obstruct assessable route.
PUSH BUTTON POLE	PMD-07	Crosswalk Button	A 30" x 48" level area is required to be centered on the button. Dimension says 2' to 5' from pole to back of curb. Suggest button either be moved to the other side of the pole or this dimension be changed to 4' to 5'.
WIRE THROUGH CURB TO PULL BOX	ID-07	Pull Box and Lid	Ensure that pull box ring and lid are flush with surrounding sidewalk.
WIRING IN SIGNAL POLE	PWD-02	Audible Signal	Are audible signals provided for the visually impaired?
WIRING IN SIGNAL POLE	PWD-02	Push Button Access	Refer to PMD-04 (page 245) for push button requirements.
SERVICE POLE WARNING LIGHT	SZS-03	Height of accessories	No sidewalk is indicated, but if a sidewalk is provided, ensure all accessories which project 4" or more are at least 80" above sidewalk.
WARNING SIGNAL LIGHT	SZS-05	Height of accessories	Ensure that all accessories, including warning light hoods, are at least 80" above the sidewalk if they project 4" or more from the pole.

Table 1. Summary of Design Standard Issues (cont.)

Detail	Sheet	Issue	Recommendation
6" STREET SIGNS	STS-01	Sign Placement	Drawing as shown is acceptable. However, if the sign encroaches into the space above the sidewalk and the shorter, 5'-0", height is used, this would be acceptable.
9" STREET SIGNS	STS-02	Sign Placement	Drawing as shown is acceptable. However, if the sign encroaches into the space above the sidewalk and the shorter, 5'-0", height is used, this would not be acceptable.

3.1.9 Grievance Procedure and Grievance Form Process

Local governments with 50 or more employees are required to adopt and publish grievance procedures for Title II complaints. A grievance form is not required by the Department of Justice, but a form can be an effective tool to aid in the collection of information needed to address a complaint. Title II does not specify what must be included in a grievance procedure, but the Department of Justice has developed a model grievance procedure that can be used as a starting point.

Self-Evaluation Findings

The City previously did not have a grievance procedure. A grievance procedure was developed based on standard recommended language set forth by the Department of Justice.

The City did have a grievance form which was available in digital form from the City's web site. The existing grievance form was evaluated and determined to be insufficient. The form did make reference to an ADA Coordinator but did not mention the individual by name.

Recommended Actions

An updated grievance form was created in order to more sufficiently capture information about the grievance. Additional areas were added to the grievance form that included questions about:

- Type of grievance;
- Reporting individual's contact information;
- Authorized representative of the reporting individual;
- Date and time of the incident;
- Department, facility, or location where the incident occurred
- Whether or not attempts have been made to resolve the complaint through a City department; and
- Remedy the individual filing the grievance is seeking.

The City has designated an ADA Coordinator and their name was included in the grievance procedure as well on the grievance form. The grievance procedure and a sample grievance form are included in the Appendix.

3.1.10 Exceptions and Exemptions under the ADA

As a Title II entity, the City must 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. The City is not necessarily required to make each of its existing facilities accessible and usable by individuals with disabilities. The City is not required to take any action that would threaten or destroy the historic significance of an historic property or take any action that would result in a fundamental alteration of the nature of a service, program or activity or create any undue financial and administrative burden. In the event that the City believes that any proposed action would fundamentally alter the service, program or activity or generate undue financial or administrative burden, the City has the responsibility of providing proof of such. The City must, however, take any other action that would ensure that individuals with disabilities receive the benefits or services provided by the City.

In lieu of structural changes to existing facilities, other methods that are effective in achieving compliance may be used. These may include acquisition of equipment or reassignment of services to accessible facilities. In regards to historic properties alternative methods for compliance may include audio-visual materials and devices or assigning persons to guide those with disabilities.

3.2 Facilities Review

In 2014 and 2015, the City of Edmond conducted a comprehensive evaluation of architectural barriers in numerous City owned facilities. These evaluations were the first phase of facility evaluations selected by City staff. They also include a mix of different facility types and will provide the City an overview of the architectural barriers that prevent people with disabilities from using its facilities and participating in its programs.

The infrastructure evaluation process was accomplished using field crews equipped with measuring devices and Global Position System (GPS) based data collection forms. The evaluations identified physical barriers in City facilities based on the 2010 ADA Standards and Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG). Detailed measurements of the existing conditions, planning-level recommendations for removing the physical barriers, and photos of each facility were recorded during the evaluation process and were included in the facility reports. Field crews were also required to note if the specific facility was in close proximity to a significant pedestrian attractor (e.g., government office, medical facility, school, etc.). This additional information assisted the Consultant team and City staff in prioritizing barriers for removal. All data collected is compatible with the City's existing Geographic Information Systems (GIS) database. The following facilities were evaluated:

- Buildings;
- Parks;
- Signalized Intersections;
- Sidewalk Corridors; and
- Transit Stops.

Summary reports were developed for each facility type to document the findings of the evaluations. The reports identify the compliance status of each facility with regard to federal standards and include the following elements:

- Listing of facilities that are in compliance with current ADA standards;
- Listing of facilities that are not in compliance with current ADA requirements;
- Recommended actions to resolve non-compliance issues for each facility;
- Prioritized list of improvements using criteria developed by the Consultant and City staff;
- "Cost report" that assigns conceptual budget estimates to each recommended action; and

- Photolog summary for signalized intersections, unsignalized intersections, issues along sidewalk corridors (sidewalk issue photos provided in the GIS database only), and transit stops.

Copies of the evaluation reports are provided in the Appendix.

3.2.1 Buildings

A total of fourteen (14) building locations were evaluated as part of this project. In addition to the buildings, the associated parking lots serving the buildings were also evaluated.

A map of all evaluated buildings is included in the Appendix.

Areas that were evaluated for each building included parking lots, path of travel from the parking lot to the building, access into the building, signage, drinking fountains, telephones, bathrooms, and counter heights. The self-evaluation reports for these buildings can be found in the Appendix.

Self-Evaluation Findings

The existing accessible parking was generally substantially compliant; however, the number of accessible parking spaces was insufficient in some cases.

The path from accessible parking to the building entrance(s) was generally not in substantial compliance.

Many of the paths included excessive running slopes and cross slopes and changes in level.

Many restrooms provided were not in substantial compliance. There appears to have been attempts to create accessible restrooms; however, full compliance was not achieved. Many of the older restrooms are severely out of compliance.

Recommended Actions

Detailed recommendations for each building are provided in the facility reports.

3.2.2 Parks

A total of fifteen (15) park locations were evaluated as part of this project.

A map of all evaluated parks is included in the Appendix.

Areas that were evaluated for each park included parking lots, path of travel from the parking lot to the park amenities, access into facilities, signage, drinking fountains and restrooms. The self-evaluation reports for these parks can be found in the Appendix.

Self-Evaluation Findings

The following common issues were observed at these parks:

- Insufficient accessible parking was provided at some parks;
- The paths from parking areas to the park amenities included excessive cross slopes and changes in level;
- Many of the park amenities, such as picnic areas and playgrounds, were not accessible or located along accessible paths.

- Concession stands have high counters and level changes on the approach
- Dock and pier areas not compliant.

Recommended Actions

Detailed recommendations for each park are provided in the facility reports.

3.2.3 Signalized Intersections

Seventy-three (73) signalized intersections within the City of Edmond were identified and evaluated as part of this project. Signalized intersection evaluations cataloged the conditions and measurements along the pedestrian path of travel, which includes street crossings, curb ramps, sidewalk adjacent to the curb ramps, and pedestrian signal equipment and adjacent clear spaces. All signalized intersections included in the evaluation are shown on a map included in the Appendix.

Self-Evaluation Findings

Common curb ramp issues at signalized intersections included excessive flare cross slopes, no presence of color or texture contrasts, excessive landing running slopes, and obstructions in the ramps, landings, or flares. Table 2 provides a summary of the curb ramp issues at signalized intersections.

More than ten percent of valid pedestrian crossings at signalized intersections did not have pedestrian signal heads or pedestrian push buttons. Pedestrian push buttons and signal heads were recommended at all valid signalized intersection pedestrian crossings where they did not exist. Common issues associated with the existing pedestrian push buttons included no clear floor spaces or no access to clear floor spaces, excessive clear floor running and cross slopes, push buttons installed at locations inconsistent with the current *Manual on Uniform Traffic Control Devices (MUTCD)* guidance, and push button installed at non-compliant heights. Table 3 provides a summary of the push button issues.

Recommended Actions

Detailed recommendations for each signalized intersection are provided in the facility reports in the Appendix.

Table 2. Summary of Curb Ramp Issues at Signalized Intersections

Curb Ramp Issue	Number Evaluated	Number Non-Compliant	Percent Non-Compliant
Flare cross slope > 10%	238	167	70.2%
No color contrast	334	218	65.3%
No texture contrast	334	200	59.9%
Landing running slope > 2%	297	163	54.9%
No flush transition to roadway	334	145	43.4%
Obstruction in ramp, landing, or flares	334	139	41.6%
Ramp cross slope > 2%	334	137	41.0%
Ramp running slope > 8.3%	334	131	39.2%
Ponding in ramp, landing, or flares	334	127	38.0%
Landing cross slope > 2%	297	102	34.3%
Ramp sides < 90°	96	26	27.1%
No landing	334	34	10.2%
Ramp width < 48"	334	32	9.6%
Ramp counter slope > 5%	334	28	8.4%
Traversable sides	96	7	7.3%
No ramp where ramp is needed	361	24	6.6%
No 48" crosswalk extension	267	11	4.1%

Table 3. Summary of Push Button Issues

Push Button Issue	Number Evaluated	Number Non-Compliant	Percent Non-Compliant
No clear floor space or no access	485	241	49.7%
Clear floor space running slope > 2%	244	112	45.9%
Clear floor space cross slope > 2%	244	109	44.7%
Push button offset from crosswalk > 5'	485	133	27.4%
Push button offset from curb > 10'	485	117	24.1%
Push button height > 48"	485	58	12.0%
Missing pedestrian head where pedestrian head is needed	597	71	11.9%
Missing push button where push button is needed	597	67	11.2%
Push button diameter not 2"	485	52	10.7%
Push button orientation not parallel	485	14	2.9%

3.2.4 Sidewalk Corridors

Approximately 66.5 miles of sidewalk were evaluated as part of this project. Sidewalk corridors were selected due to their high level of pedestrian activity as well as their proximity to pedestrian traffic generators. Future phases of the ADA transition plan are expected to complete evaluations for the remainder of the sidewalk, with arterial sidewalks being evaluated first, followed by collector and local road sidewalk. A map of the evaluated sidewalk corridors is included in the Appendix.

Self-Evaluation Findings

The sidewalk corridor evaluations documented conditions and measurements along the pedestrian path of travel, which includes the sidewalk, curb ramps, pedestrian crossings at driveway openings, and pedestrian crossings at unsignalized intersections with cross streets. Common issues along the sidewalk corridor were excessive sidewalk cross slopes, vertical surface discontinuities that caused excessive level changes, excessive driveway and cross street cross slopes, permanent obstructions in the sidewalk such as power poles or utilities, and temporary obstructions in the sidewalk or path of travel such as weeds and low hanging branches. Where excessive vegetation was present, field crews attempted to assess the condition of the underlying sidewalk. Where possible, the condition of the underlying sidewalk was recorded; however, the City of Edmond may find additional issues with the sidewalk once the temporary obstruction is removed.

Common curb ramp issues at unsignalized intersections along sidewalk corridors included excessive flare cross slopes, no presence of color or texture contrast on ramps, excessive ramp cross slopes, and excessive landing running and cross slopes. A summary of the unsignalized intersection curb ramp issues is provided in Table 4. It was the recommendation that non-compliant curb ramps, sidewalk, and pedestrian paths of travel along driveways and street crossings at unsignalized intersections to be removed and replaced. It was also recommended that curb ramps be installed where sidewalks lead up to the curb at an intersection, both parallel and perpendicular to the project corridor. Where sidewalks parallel to the project corridor lead up to the curb from a driveway.

The ADA of 1990, Section 35.150, Existing Facilities, requires that the Transition Plan include a schedule for providing curb ramps or other sloped area at existing pedestrian walkways, which applies to all facilities constructed prior to 1992. For any sidewalk installations constructed from 1992 to March 15, 2012, the curb ramps should have been installed as part of the sidewalk construction project per the 1991 Standards for Accessible Design, Section 4.7 Curb Ramp, which states, "curb ramps complying with 4.7 shall be provided wherever an accessible route crosses a curb." For sidewalk installations constructed on or after March 15, 2012 similar guidance is provided in the 2010 Standards for Accessible Design, Section 35.151 of 28 CFR Part 35, New construction and alterations, which states, "newly constructed or altered street level pedestrian walkways must contain curb ramps or other sloped area at any intersection having curb or other sloped area at intersections to streets, roads, or highways."

Recommended Actions

Detailed recommendations for each sidewalk corridor and unsignalized intersection are provided in the facility reports in the Appendix.

Table 4. Summary of Curb Ramp Issues at Unsignalized Intersections

Curb Ramp Issue	Number Evaluated	Number Non-Compliant	Percent Non-Compliant
Flare cross slope > 10%	865	759	87.7%
No color contrast	1236	977	79.0%
No texture contrast	1236	966	78.2%
Ramp cross slope > 2%	1362	787	57.8%
Landing running slope > 2%	1226	590	48.1%
Landing cross slope > 2%	1226	570	46.5%
Ramp running slope > 8.3%	1362	515	37.8%
No flush transition to roadway	1362	502	36.9%
Ramp sides < 90°	497	162	32.6%
Obstruction in ramp, landing, or flares	1362	375	27.5%
Ponding in ramp, landing, or flares	1362	283	20.8%
No ramp where ramp is needed	2071	371	17.9%
Ramp width < 48"	1362	200	14.7%
No landing	1362	124	9.1%
Ramp counter slope > 5%	1362	113	8.3%
Traversable sides	497	39	7.8%
Ramp does not land in crosswalk	1362	28	2.1%

3.2.5 Transit Stops

Six (6) transit stops within Edmond were identified and evaluated as part of this project. All transit stops included in the evaluation are listed on a map included in the Appendix.

Self-Evaluation Findings

Transit stop evaluations documented the conditions and measurements within the boarding areas, adjacent sidewalk network, transit stop sidewalk areas, and transit stop amenities. A summary of the transit stop issues is provided in Table 5. Common issues for each area included transit stops with no signage, excessive boarding area running slopes, excessive sidewalk network cross slopes, excessive transit stop sidewalk cross slopes, and transitions from boarding areas to curbs that are not flush.

Recommended Actions

Detailed recommendations for each transit stop are provided in the facility reports in the Appendix.

Table 5. Summary of Transit Stop Issues

Transit Stop Issue	Number Evaluated	Number Non-Compliant	Percent Non-Compliant
Boarding Area Issues			
Boarding area running slope is greater than 2%	6	4	66.7%
Transition at connection to the curb is greater than 0.25"	6	3	50.0%
Boarding area length is less than 96"	6	2	33.3%
Boarding area width is less than 60"	6	2	33.3%
Heaving/Sinking/Cracking present in the boarding area	6	1	16.7%
Temporary obstruction (>0.25") in boarding area	6	1	16.7%
Boarding area is missing a connection to the street or sidewalk network	6	1	16.7%
Boarding area cross slope is greater than adjacent street grade	6	0	0.0%
Ponding present in the boarding area	6	0	0.0%
Permanent obstruction (>0.25") in boarding area	6	0	0.0%
Adjacent Sidewalk Network Issues			
Sidewalk network cross slope is greater than 2%	3	2	66.7%
Sidewalk network width is less than 48"	3	0	0.0%
Heaving/Sinking/Cracking present in the sidewalk network	3	0	0.0%
Ponding present in the sidewalk network	3	0	0.0%
Permanent obstruction (>0.25") in sidewalk network	3	0	0.0%
Temporary obstruction (>0.25") in sidewalk network	3	0	0.0%
Transition at connection to boarding area is greater than 0.25"	3	0	0.0%
Transit Stop Sidewalk Issues			
Transit stop sidewalk cross slope is greater than 2%	3	2	66.7%
Transition at connection to sidewalk network is greater than 0.25"	3	1	33.3%
Heaving/Sinking/Cracking present in the transit stop sidewalk	3	0	0.0%
Ponding present in the transit stop sidewalk	3	0	0.0%
Permanent obstruction (>0.25") in transit stop sidewalk	3	0	0.0%
Temporary obstruction (>0.25") in transit stop sidewalk	3	0	0.0%
Transit Stop Amenity Issues			
No transit stop signage	6	6	100.0%
No clear space under shelter	6	0	0.0%
Shelter clear space length is less than 48"	6	0	0.0%
Shelter clear space width is less than 30"	6	0	0.0%
Shelter clear space cross slope is greater than 2%	6	0	0.0%
Shelter clear space running slope is greater than 2%	6	0	0.0%
Shelter opening clear width is less than 32"	6	0	0.0%

3.3 Maintenance versus Alterations

The United States Department of Justice (DOJ) has issued a briefing memorandum on a clarification of maintenance versus projects. Information contained in the briefing memorandum is below. We recommend this clarification be disseminated to the appropriate City Staff for when a curb ramp installation is required as part of a project.

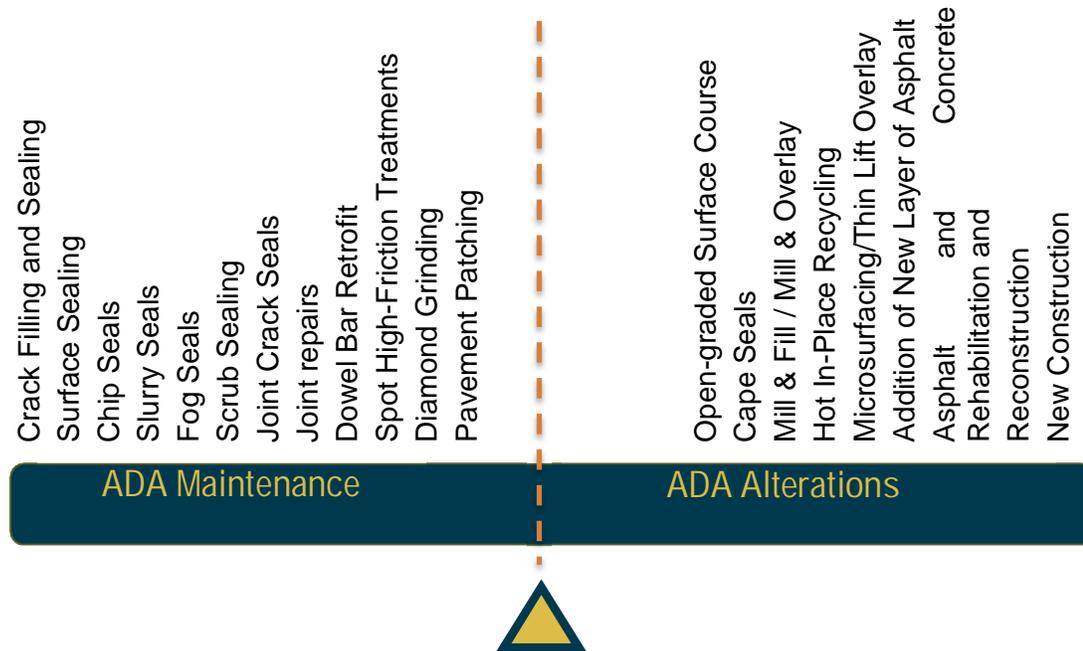
The Americans with Disabilities Act of 1990 (ADA) is a civil rights statute prohibiting discrimination against persons with disabilities in all aspects of life, including transportation, based on regulations promulgated by the United States Department of Justice (DOJ). DOJ's regulations require accessible planning, design, and construction to integrate people with disabilities into mainstream society. Further, these laws require that public entities responsible for operating and maintaining the public rights-of-way do not discriminate in their programs and activities against persons with disabilities. FHWA's ADA program implements the DOJ regulations through delegated authority to ensure that pedestrians with disabilities have the opportunity to use the transportation system's pedestrian facilities in an accessible and safe manner.

FHWA and DOJ met in March 2012 and March 2013 to clarify guidance on the ADA's requirements for constructing curb ramps on resurfacing projects. Projects deemed to be alterations must include curb ramps within the scope of the project.

This clarification provides a single Federal policy that identifies specific asphalt and concrete-pavement repair treatments that are considered to be alterations – requiring installation of curb ramps within the scope of the project – and those that are considered to be maintenance, which do not require curb ramps at the time of the improvement. Figure 1 provides a summary of the types of projects that fall within maintenance versus alterations.

This approach clearly identifies the types of structural treatments that both DOJ and FHWA agree require curb ramps (when there is a pedestrian walkway with a prepared surface for pedestrian use and a curb, elevation, or other barrier between the street and the walkway) and furthers the goal of the ADA to provide increased accessibility to the public right-of-way for persons with disabilities. This single Federal policy will provide for increased consistency and improved enforcement.

Figure 1. Maintenance versus Alteration Projects



Source: DOJ Briefing Memorandum on Maintenance versus Alteration Projects

3.4 FHWA Guidance on Closing Pedestrian Crossings

The FHWA has provided guidance on closing pedestrian crossings. If an engineering study (performed by the City and not included in the scope of this Transition Plan) determines the crossing is not safe for any user, the crossing should be closed by doing the following:

- A physical barrier is required to close a crossing at an intersection. FHWA has determined that a strip of grass between the sidewalk and the curb IS acceptable as a physical barrier.
- A sign should be used to communicate the closure.

The agency wishing to close certain intersection crossings should have a reasonable and consistent policy on how to do so written in their Transition Plan or as a standalone document. If safety concerns are established by an engineering study, a pedestrian crossing should not be accommodated for people with disabilities. The City of Edmond should also develop and implement a policy to close those that are currently accommodated based on the existing conditions at the crossing location (e.g. existing sidewalk leading up to the curb in the direction of the crossing or existing curb ramp or crosswalk currently serving the crossing).

3.5 Prioritization

The following sections outline the prioritization factors and results of the prioritization for buildings, parks, signalized intersections, sidewalks, unsignalized intersections, and transit stops. Each facility type has a different set of parameters to establish the prioritization for improvements. These prioritization factors were taken into consideration when developing the implementation plan for the proposed improvements.

3.5.1 Prioritization Factors for Facilities

Buildings and Parks were prioritized on a 12-point scale, which is defined in Table 6. All prioritization methodologies have been developed by the Consultant team to aid the City in determining how the facility type should be prioritized for improvements based on the severity of non-compliance with ADA.

Signalized and unsignalized intersections were prioritized on a 13-point scale, defined in Table 7.

Sidewalk corridors were prioritized on a 3-point scale and were given a priority of either “High”, “Medium”, or “Low” based on the severity of non-compliance, defined in Table 8. Compliant segments of the sidewalk corridor were given a priority label of “Compliant”.

Transit stops were prioritized based on a 5-point scale, which is defined in Table 9.

Table 6. Prioritization Factors for Buildings and Parks

Priority	Criteria
1 (high)	<ul style="list-style-type: none"> • Dangerously steep slopes • Protruding objects • Obvious safety liabilities • Areas where complaints have been filed
2 (high)	<ul style="list-style-type: none"> • New construction built out of compliance • Older construction severely out of compliance (see Accessible Route list for sidewalks, curb ramps/ramps) • Alterations that did not bring required elements into compliance (e.g. adding a break room or restroom that isn't compliant) • Narrow doors (less than 32" clear width) • Items severely out of compliance
3 (high)	<ul style="list-style-type: none"> • No accessible parking • No accessible route from parking to the building entrances • No accessible route to adjacent sidewalk system, when provided • Severely non-compliant parking (bad slopes, gravel surface, etc.) • Maneuvering clearance – Main entry door has less than 18" on the pull side (Less than 16") • Maneuvering clearance – Area in front of the door slopes over 4% in any direction

Table 6. Prioritization Factors for Buildings and Parks (cont.)

Priority	Criteria
4 (high)	<ul style="list-style-type: none"> • No accessible route to covered areas inside buildings on site (no elevator to upper areas, steps only, narrow doors, etc.) • No accessible counter heights (reception counters, utilities counters, etc.) • No access to public areas (coffee bars, break rooms, conference rooms, smoking areas etc.) • No access to City Council chambers, court rooms or other amenities • Gaps or grate openings over ½" wide • Obstructed clear floor spaces for required elements • No grab bars are provided • Area in front of main entry door slopes more than 4% in any direction • Interior doors over 20 lbs. in weight • Interior doors with less than 18" on the pull side (Less than 16") • Lavatory is mounted above 35.5" or has less than 14" center line space • No knee clearance under the lavatory • Accessible parking is not on the shortest accessible route to the building entrance • Non-compliant parking, requiring a structural solution • Protrusion into the path of travel that is over 9" and below 70" • No accessible toilets • Seating provided, but none accessible • No accessible showers/benches/changing areas • Ground/floor slopes more than 4% in any direction • Stall door is directly in front of the water closet • No ambulatory stall is provided • Transaction counters 38" or above • Urinal above 20" to the rim • Audible alarm system with no visual alarms • No accessible route to park amenities • No access to amenities/pool
5 (medium)	<ul style="list-style-type: none"> • Non-compliant parking (non- structural solution) • Non-compliant public access spaces (coffee bars, break rooms, conference rooms, smoking areas etc.) • Non-compliant interior door clearances (16" to 17 7/8" on pull side) • Non-compliant restroom amenities (water closet, urinal, lavatory) • Non-compliant door hardware • Area in front of doors slopes between 2.1% and 3.9% in any direction • Lavatory/sink pipes are not wrapped or protected, lavatory sink is 34.1" to 35.5", Lav center line is 14" to 14.9" • No accessible bench in a locker room • Non-compliant playground surfacing • Non-compliant playground equipment • Non-compliant route to amenities • Flush control is on the wrong side

Table 6. Prioritization Factors for Buildings and Parks (cont.)

Priority	Criteria
6 (medium)	<ul style="list-style-type: none"> • Non-compliant showers/changing areas • Non-compliant dug-outs at ball fields • Non-compliant dispensers (above 54" paper towel, coat hook, etc.) • Accessible stall door is not self-closing • Vision panel is 46" or above • Accessible toilet stall does not have handles on both sides • Non-compliant grab bars • Non-compliant showers/benches/changing areas • Non-compliant signage • No accessible cabinets • No accessible drinking fountains
7 (medium)	<ul style="list-style-type: none"> • Accessible route with moderate access issues (level changes that can be ground down or fitted with device) • Baby changing table over 36" • Accessible seating not integrated with other seating or mounted on a slope • Non-compliant pay phone • Not enough accessible cabinets
8 (medium)	<ul style="list-style-type: none"> • Non-compliant drinking fountains • No accessible telephones • Grab bars mounted above 37" • Protrusion into a path of travel 6.1" to 9" and/or between 70.1" and 80" • Water closet seat at or above 20"
9 (low)	<ul style="list-style-type: none"> • Non-compliant parking (striping, signage) • Non-compliant dispensers (between 48" and 54" – Paper towel, coat hook, etc) • Non-compliant parking (striping, signage) • Non-compliant pay phone • Not enough accessible cabinets
10 (low)	<ul style="list-style-type: none"> • Minor level changes, gaps or cracks in accessible route • Vision panel is 1/2" to 3" too high • Knee clearance minimally off. Any dimension for knee clearance less than 1" • Urinal mounted over 17" but less than 18" • No visual strobe provided in employee area • Water closet seat mounted over 19" less than 20"
11 (low)	<ul style="list-style-type: none"> • Coat hook is not in accessible stall, but is in other stalls • Up to 37", or 1" over compliance • Non-compliant public phones • Into path of travel 4.1" to 6"
12 (low)	<ul style="list-style-type: none"> • Covered under 'safe harbor' but not compliant because the room wasn't fully compliant with old standards • Within a reasonable tolerance, but not compliant

Table 7. Prioritization Factors for Signalized and Unsignalized Intersections

Priority	Criteria
1 (high)	Complaint filed on curb ramp or intersection or known accident/injury at site
2 (high)	Existing curb ramp with any of the following conditions: <ul style="list-style-type: none"> • Running slope > 12% • Cross slope > 7% • Obstruction to or in the ramp or landing • Level change > ¼ inch at the bottom of the curb ramp • No detectable warnings AND within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
3 (high)	<ul style="list-style-type: none"> • No curb ramp where sidewalk or pedestrian path exists AND within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
4 (high)	No curb ramps but striped crosswalk exists
5 (medium)	Existing curb ramp with any of the following conditions: <ul style="list-style-type: none"> • Running slope > 12% • Cross slope > 7% • Obstruction to or in the ramp or landing • Level change > ¼ inch at the bottom of the curb ramp • No detectable warnings AND NOT within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
6 (medium)	<ul style="list-style-type: none"> • No curb ramp where sidewalk or pedestrian path exists AND NOT within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
7 (medium)	One curb ramp per corner and another is needed to serve the other crossing direction
8 (medium)	Existing curb ramp with any of the following conditions: <ul style="list-style-type: none"> • Cross slope > 5% • Width < 36 inches • Median/island crossings that are inaccessible
9 (low)	Existing curb ramp with either running slope between 8.3% and 11.9% or insufficient landing
10 (low)	Existing diagonal curb ramp without a 48 inch extension in the crosswalk
11 (low)	Existing pedestrian push button is not accessible from the sidewalk and/or ramp
12 (low)	Existing curb ramp with returned curbs where pedestrian travel across the curb is not protected
13 (low)	All other non-compliant intersections not prioritized above

Table 8. Prioritization Factors for Sidewalk Corridors

Criteria	Priority		
	1 (high)	2 (medium)	3 (low)
Cross slope of sidewalk is greater than 2%	Value > 3.5	3.5 ≥ Value > 2.0	
Width of sidewalk is less than 48 inches	Value ≤ 36.0	36.0 < Value < 42.0	42.0 < Value < 48.0
Obstruction present along sidewalk	Obstruction - Permanent	Obstruction - Temporary	
Heaving, Sinking, or Cracking present on sidewalk	Heaving Sinking Cracking		
Ponding on sidewalk		Ponding	
Missing Sidewalk			Missing Sidewalk
Cross street cross slope is greater than 2%	Value > 6.0	6.0 ≥ Value ≥ 4.0	4.0 > Value > 2.0
Cross street running slope is greater than 5%	Value > 7.0	7.0 ≥ Value ≥ 6.0	6.0 > Value > 5.0
Driveway sidewalk width is less than 48 inches	Value ≤ 46.0	46.0 < Value < 48.0	
Driveway (or sidewalk if applicable) cross slope is greater than 2%	Value > 6.0	6.0 ≥ Value ≥ 4.0	4.0 > Value > 2.0
Driveway (or sidewalk if applicable) condition is poor or poor dangerous	Poor-Dangerous (elevation change greater than ½ inch or gaps greater than 1 inch)	Poor (elevation change between ¼ inch and ½ inch or gaps between ½ inch and 1 inch)	

Table 9. Prioritization Factors for Transit Stops

Priority	Criteria
1 (high)	<ul style="list-style-type: none"> No connection from transit stop to adjacent sidewalk Transitions at connections between the boarding area, transit stop sidewalk, and/or sidewalk network is greater than 0.25" Heaving/sinking/cracking in the boarding area, transit stop sidewalk, or sidewalk network that connects to the transit stop with level changes greater than 0.25", or gaps over 0.5" Boarding area does not exist
2 (high)	<ul style="list-style-type: none"> Boarding area length less than 48" Boarding area width less than 36" Boarding area running slope exceeds 5% Permanent obstruction (>0.25") in boarding area, transit stop sidewalk, or sidewalk network Transition at connection to the curb is greater than 0.25" Clear space width under shelter or adjacent to a stand-alone bench is less than 30"
3 (medium)	<ul style="list-style-type: none"> Boarding area cross slope is greater than 2% over the street grade Sidewalk network or transit stop sidewalk cross slope is over 3.5% No clear space adjacent to bench under shelter Clear space cross slope under shelter or adjacent to a stand-alone bench is greater than 3.5%; Clear space running slope under shelter or adjacent to a stand-alone bench is greater than 3.5%; Clear space length under shelter or adjacent to a stand-alone bench is less than 42" Shelter opening clear width is less than 30"
4 (medium)	<ul style="list-style-type: none"> Boarding area length is 48" – 76.9" Boarding area width is 36" – 47.9" Boarding area running slope is 3.1% - 5% Ponding in the boarding area, transit stop sidewalk, or sidewalk network Temporary obstruction (>0.25") in boarding area, transit stop sidewalk, or sidewalk network Sidewalk network connecting to the transit stop is 46.1" – 47.9" wide Sidewalk network cross slope is between 2.1% to 3.5% No transit stop signage Non-compliant transit stop signage No clear space adjacent to stand-alone bench Clear space cross slope under shelter or adjacent to a stand-alone bench is 2.1% - 3.5% Clear space running slope under shelter or adjacent to a stand-alone bench is 2.1% - 3.5% Clear space length under shelter or adjacent to a stand-alone bench is 42" – 45.9" Shelter opening clear width is between 30" and 32"
5 (low)	<ul style="list-style-type: none"> Boarding area length is 72" - 95.9" Boarding area width is 48" - 59.9" Boarding area running slope is 2.1% - 4.9% Clear space length under shelter or adjacent to a stand-alone bench is 46" – 47.9"

Self-Evaluation Findings

Table 10, Table 11, Table 12, and Table 13 provide summaries of the prioritization classifications for signalized intersections, sidewalks, unsignalized intersections, and transit stops, respectively.

Table 10. Prioritization Summary Signalized Intersections

Priority	Number of Intersections
1 (high)	-
2 (high)	29
3 (high)	-
4 (high)	2
5 (medium)	39
6 (medium)	-
7 (medium)	-
8 (medium)	-
9 (low)	-
10 (low)	-
11 (low)	-
12 (low)	-
13 (low)	3
Total	73

Table 11. Prioritization Summary for Sidewalk Corridors

Line type	Length (miles) by Priority						Total
	1 (high)	2 (medium)	3 (low)	Handrail Needed	Compliant	Not Prioritized	
Sidewalk Line	7.06	16.77	0.12	27.40	-	-	51.35
Sidewalk Issues (including missing sidewalk)	4.28	1.25	13.66	0.04	0.01	0.01	19.26
Driveways	2.02	1.07	0.75	1.13	-	-	4.97
Cross Streets	0.44	0.60	1.33	2.33	-	-	4.70
Total	13.82	19.68	15.86	30.90	0.01	0.01	80.27

Table 12. Prioritization Summary for Unsignalized Intersections

Priority	Number of Intersections
1 (high)	-
2 (high)	168
3 (high)	33
4 (high)	-
5 (medium)	380
6 (medium)	56
7 (medium)	1
8 (medium)	1
9 (low)	20
10 (low)	-
11 (low)	-
12 (low)	-
13 (low)	53
Total	712

Table 13. Prioritization Summary for Transit Stops

Priority	Number of Intersections
1 (high)	2
2 (high)	2
3 (high)	-
4 (medium)	2
5 (low)	-
Total	6

3.6 Conclusion/Action Log

The City is taking the actions referenced below and will continue to look for and remedy, barriers to access in an effort to ensure that the disabled citizens of the City of Edmond are given access to the City's programs, services and activities.

To confirm follow-up on corrective actions required under the Transition Plan, the City will institute an ADA Action Log, documenting its efforts at compliance with the ADA. At a minimum, the Action Log will identify items that are not ADA compliant and will include anticipated completion dates. After the adoption of this Plan by the Governing Body of the City, the ADA Action Log will be updated on an annual basis. The ADA Action Log shall be available upon request.

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4.0 Staff Training

Training was provided to City staff to address some of the issues identified in the departmental surveys and interviews. The following training sessions were provided by the Consultant team:

- April 2, 2015 – Full ADA Training
 - Concentrated PROWAG (Public Right-of-Way), Class #1
 - Disability Awareness for Staff in Contact with the Public, Class #1
- April 23, 2015 - Disability Awareness for Staff in Contact with the Public, Class #2
- May 20, 2015 - Concentrated PROWAG (Public Right-of-Way), Class #2

Descriptions of each training provided are provided below:

Full ADA Training (6 hours)

Concentrated PROWAG (Public Right-of-Way) (4 hours)

This training explained the PROWAG requirements as well as the "spirit" of the ADA law. Topics covered included the difference between maintenance versus alterations, how to achieve compliance with difficult site constraints, how to make good decisions in the field, and how to know when additional help is needed. This class was very technical in the design and installation of curb ramps and sidewalks in the public rights-of-way.

Disability Awareness for Staff in Contact with the Public (2 hours)

The training provided an overview of the access criteria and requirements mandated for State and local government staff interacting with the public. Best practices for sensitive and respectful interactions were explained. Communication topics included correct language and etiquette, appropriate use of terminology, and dealing with service animals in public places. The training concluded with a brief overview of maintaining accessibility for people with disabilities.

City Staff in Attendance: 20 in person

Concentrated PROWAG (Public Right-of-Way) (4 hours)

This training explained the PROWAG requirements as well as the "spirit" of the ADA law. Topics covered included the difference between maintenance versus alterations, how to achieve compliance with difficult site constraints, how to make good decisions in the field, and how to know when additional help is needed. This class was very technical in the design and installation of curb ramps and sidewalks in the public rights-of-way.

City Staff in Attendance: 20 in person, 104 via video

Disability Awareness for Staff in Contact with the Public (2 hours)

The training provided an overview of the access criteria and requirements mandated for State and local government staff interacting with the public. Best practices for sensitive and respectful interactions were explained. Communication topics included correct language and etiquette, appropriate use of terminology, and dealing with service animals in public places. The training concluded with a brief overview of maintaining accessibility for people with disabilities.

City Staff in Attendance: 15 in person, 58 via video

5.0 Facility Costs

5.1 Facilities Cost Projection Overview

In order to identify funding sources and develop a reasonable implementation schedule, cost projection summaries for the initial study were developed for each facility type. To develop these summaries, recent bid tabulations from Oklahoma Department of Transportation (ODOT) construction projects, along with Consultants experience with similar types of projects, were the basis for the unit prices used to calculate the improvement costs. A construction contingency percentage (20%) was added to the subtotal to account for increases in unit prices in the future in addition to an Engineering/Design contingency percentage (15%). Table 14 provides a summary of the estimated costs to bring each facility into compliance.

Table 14. Summary of Facility Costs

Facility Type	High	Medium	Low	Handrail Needed	Total
Buildings	\$1,035,617	\$231,395	\$86,880	N/A	\$1,353,892
Parks	\$1,787,824	\$384,084	\$52,253	N/A	\$2,224,161
Signalized Intersections	\$1,625,000	\$1,746,000	\$157,000	N/A	\$3,528,000
Sidewalk Corridors	\$6,377,531	\$10,492,162	\$3,642,600	\$12,683	\$20,525,000
Transit Stops	\$19,000	\$3,000	N/A	N/A	\$22,000
City Totals	\$10,844,972	\$12,856,641	\$3,938,733	\$12,683	\$27,653,053

5.2 Implementation Schedule

Table 15 details the barrier removal costs and proposed implementation schedule by facility type for all facilities evaluated as part of this project. This 20 year plan will serve as the implementation schedule for the Transition Plan. The City of Edmond reserves the right to change the barrier removal priorities on an ongoing basis in order to allow flexibility in accommodating community requests, petitions for reasonable modifications from persons with disabilities, and changes in City programs.

It is the intent of the City to have its ADA Coordinator work together with department heads and budget staff to determine the funding sources for barrier removal projects. Once funding is identified, the ADA Coordinator will coordinate the placement of the projects in the Capital Improvement Program to be addressed on a fiscal year basis.

Table 15. Implementation Schedule

Facility Type	Estimate Cost	Implementation Schedule (years)	Approximate Annual Budget
Buildings	\$1,353,892	7	\$193,413
Parks	\$2,224,161	10	\$222,416
Signalized Intersections	\$3,528,000	20	\$176,400
Sidewalk Corridors	\$20,525,000	20	\$1,026,250
Transit Stops	\$22,000	1	\$22,000
Total Annual Budget			\$1,640,479

5.3 Recent Projects

The City has either completed or is currently working on several projects to help improve accessibility throughout the City.

- Intelligent Transportation System along Second St. from N. Santa Fe Ave. to Saints Blvd. – Installation of 126 accessible pedestrian signals (APS) and 126 LED countdown pedestrian signal heads at 22 signalized intersections. Currently under construction. Estimated pedestrian signal equipment costs: \$216,090.
- Roadway widening along W. Covell Rd. from N. Santa Fe Ave. to Thomas Dr. – Installation of 22 accessible pedestrian signals (APS), 22 LED countdown pedestrian signal heads, and ADA curb ramps at three (3) signalized intersections (Marilyn Williams, Kelly Thomas, and Lowes). Completed in September 2013. Estimated pedestrian signal equipment costs: \$25,652.
- Roadway widening along N. Kelly Ave. from W. Danforth Rd. to W. Covell Rd. – Installation of six (6) accessible pedestrian signals (APS), six (6) LED countdown pedestrian signal heads, and ADA curb ramps at one (1) signalized intersection (Lowes). Completed in September 2013. Estimated pedestrian signal equipment costs: \$6,996.
- Roadway widening along N. Kelly Ave. from W. Covell Rd. to W. Coffee Creek Rd. – Installation of eight (8) accessible pedestrian signals (APS), eight (8) LED countdown pedestrian signal heads, and ADA curb ramps at one (1) signalized intersection (Prairie Village). Completed in July 2014. Estimated pedestrian signal equipment costs: \$9,328.
- Roadway overlay along N. Boulevard St. from E. Lincoln Ave. to E. 1st St. – Installation of ADA curb ramps and sidewalk. Completed in October 2014. Estimated pedestrian improvement costs: \$15,330.
- Roadway overlay along N. Santa Fe Ave. from Crosstails to Castle Rock – Installation of ADA curb ramps and sidewalk. Completed in November 2014. Estimated pedestrian improvement costs: \$16,596.
- Roadway overlay along E. 33rd St. from S. Bryant Ave. to S. Boulevard St. – Installation of ADA curb ramps and sidewalk. Completed in July 2014. Estimated pedestrian improvement costs: \$100,364.

- Sidewalk installation (160 feet) along Baumann St. Completed June 2015. Estimated pedestrian improvement costs: \$25,000.
- Installation of ADA curb ramps and sidewalk along 2nd St. Completed in April 2014. Estimated pedestrian improvement costs: \$2,532.

5.4 Funding Opportunities

Several alternative funding sources are available to the City to address the issues identified in this Transition Plan, including federal and state funding, local funding, and private funding. The following sections detail some different funding source options.

5.4.1 Federal and State Funding

Table 16 depicts the various types of federal and state funding available for the City to apply for funding for various improvement. The following agencies and funding options are represented in the chart.

- NHS – National Highway System
- STP – Surface Transportation Program
- HSIP – Highway Safety Improvement Program
- RHC – Railway-Highway Crossing Program
- TAP – Transportation Alternatives Program
- CMAQ – Congestion Mitigation/Air Quality Program
- RTP – Recreational Trails Program
- FTA – Federal Transit Capital, Urban & Rural Funds
- TrE – Transit Enhancements
- BRI – Bridge - Highway Bridge Replacement and Rehabilitation (HBRRP)
- 402 – State and Community Traffic Safety Program
- PLA – State/Metropolitan Planning Funds
- TCSP – Transportation and Community and System Preservation Program
- FLH – Federal Lands Highways Program
- BYW – Scenic Byways
- SRTS – Safe Routes to School (Moving Ahead for Progress in the 21st Century Act (MAP-21) now under TAP)

The majority of these programs are competitive type grants; therefore, the City of Edmond is not guaranteed to receive these funds. It will be important for the City to track these programs in order to apply for the funds.

Table 16. Funding Opportunities

Activity	NHS	STP	HSIP	RHC *	TAP	CMAQ *	RTP	FTA	TrE	BRI *	402	PLA	TCSP	FLH	BYW	SRTS
Pedestrian plan		X	X			X						X	X			
Paved shoulders	X	X	X	X	X	X				X			X	X	X	
Shared-use path/trail	X	X	X		X	X	X			X			X	X	X	X
Recreational trail							X							X		
Spot improvement program		X	X		X	X							X			X
Maps		X			X	X					X		X			X
Trail/highway intersection	X	X	X		X	X	X						X	X	X	X
Sidewalks, new or retrofit	X	X	X	X	X	X		X	X	X			X	X	X	X
Crosswalks, new or retrofit	X	X	X	X	X	X		X	X				X	X	X	X
Signal improvements	X	X	X	X	X	X							X			X
Curb cuts and ramps	X	X	X	X	X	X							X			X
Traffic calming		X	X	X									X			X
Safety brochure/book		X			X	X					X		X			X
Training	X	X	X		X	X	X				X		X			X

5.4.2 Local Funding

There are several local funding options for the City to consider, including:

- General fund (sales tax and bond issue)
- Allocation of annual departmental budgets – requests for larger share to address needs in a more timely fashion
- Maintenance funds
- Special taxing districts
- Tax Increment Financing District (TIF) – A TIF allows cities to create special districts and to make public improvements within those districts that will generate private-sector development. During the development period, the tax base is frozen at the predevelopment level. Property taxes continue to be paid, but taxes derived from increases in assessed values (the tax increment) resulting from new development either go into a special fund created to retire bonds issued to originate the development, or leverage future growth in the district.
- Community Improvement District (CID) – A geographically defined district in which commercial property owners vote to impose a self-tax. Funds are then collected by the taxing authority and given to a board of directors elected by the property owners]
- Tax Allocation District (TAD) – A defined area where real estate property tax monies gathered above a certain threshold for a certain period of time (typically 25 years) to be used a specified improvement. The funds raised from a TAD are placed in a tax-free bond (finance) where the money can continue to grow. These improvements are typically for revitalization and especially to complete redevelopment efforts
- Sidewalk or Access Improvement Fee
- Transportation User Fee
- Scheduled/Funded CIP projects that are funded through bonds and sales tax.
- Community Development Block Grants (CDBG)

5.4.3 Private Funding

Private funding may include local and national foundations, endowments, private development, and private individuals. While obtaining private funding to provide improvements along entire corridors might be difficult, it is important for the City to require private developers to improve pedestrian facilities to current ADA requirements, whether it by new development or redevelopment of an existing property.

5.5 Next Steps

This document serves as the Americans with Disabilities Act (ADA) Transition Plan within the City of Edmond. In developing this Plan, program, policies and procedures were reviewed for compliance with ADA guidelines and a self-evaluation was conducted on the following facilities:

- 14 buildings;
- 15 parks;
- 73 signalized intersections;
- Approximately 66.5 miles of sidewalk and all unsignalized intersections and driveways along the sidewalk corridors; and
- 6 transit stops.

The recommended improvements were prioritized and an implementation plan was developed to provide guidance for the City's improvement projects in the coming years. Public outreach was also conducted to aid in the development of the plan.

It should be noted that this Transition Plan is focused on a portion of City of Edmond facilities, and is not intended to be a comprehensive ADA Transition Plan for all City facilities. As funding becomes available additional facility evaluations should be completed to provide a comprehensive Transition Plan for the City of Edmond.

Appendix (provided on CD)

Departmental Surveys and Interviews

Program Recommendations

Grievance Process

- ADA Notice
- Grievance Procedure
- Grievance Form

Facility Maps

- Buildings
- Parks
- Signalized Intersections
- Sidewalk Corridors
- Transit Stops

Facility Reports

- Buildings
- Parks
- Signalized Intersections
- Sidewalk Corridors
- Transit Stops