



Americans with Disabilities Act Transition Plan

RIGHT-OF-WAY SELF-EVALUATION AND ANALYSIS

Revision 2023



Alaska Department of Transportation and Public Facilities
STATE OF ALASKA

Executive Summary

Under Title II of the Americans with Disabilities Act (1990) and 28 CFR §35.105, all State and local governments are required to evaluate current services, policies and practices to ensure they are best serving the needs of the entire public, including those with disabilities. The Alaska Department of Transportation and Public Facilities (DOT&PF) provides many services to Alaskans as consumers of Alaska's transportation infrastructure. The following documents DOT&PF's efforts to evaluate the pedestrian access routes along Alaska's major roadways against current compliance standards, identify barriers for removal, and provide a resource for DOT&PF staff who are tasked with providing a safe and accessible infrastructure for all Alaskans.

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Alaska Department of Transportation and Public Facilities (DOT&PF) & the Americans with Disabilities Act (ADA)

Introduction to DOT&PF

Alaska is the largest state in the United States, at over 663,300 square miles. A diverse place, Alaska is the only state with three distinct biomes: temperate rainforest in the southeast, boreal forest in the central and interior, and the arctic desert tundra in the north. To meet the transportation needs of such varied landscapes, the Alaska Department of Transportation and Public Facilities (DOT&PF) oversees a complex network of roads, ferries, airports, rail, and pedestrian facilities. Unfortunately, the climate produces challenges to controlling these systems: from planes grounded for days due to weather to the cracking and heaving effect of freeze-thaw on paved roadways. DOT&PF is committed to providing equitable services and accessible facilities Statewide; however, given the varied and immense geographical scope, this can prove challenging. The following provides a guideline for how DOT&PF plans to address this challenge in the coming years and provide equality and accessibility as we keep Alaska moving through service and infrastructure.

Introduction to the Americans with Disabilities Act (ADA)

The Americans with Disabilities Act (ADA) of 1990 prohibits discrimination based on ability through five titles, each of which targets an area of potential discrimination. Title II of the ADA specifically addresses access to programs and services provided by State and local government for persons with disabilities. Additionally, Section 504 of the Rehabilitation Act of 1973 requires that all organizations receiving federal funds make their programs, services, and benefits available to people of all abilities. It states:

“No otherwise qualified [person with a disability] in the United States shall, solely by reason of [ability], be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”

For the DOT&PF, Title II addresses all of the services provided to Alaskans, from ferry travel on the Alaska Marine Highway to snow removal on state-maintained roads to the construction of pedestrian facilities in the State’s Right-of-Way. Under the ADA and 28 CFR, the DOT&PF is obligated to self-evaluate our current facilities under the accessibility standards the U.S Access Board put forth. After the initial self-evaluation is complete, the DOT&PF is required to develop a program.

The access plan, referred to as the DOT&PF ADA Transition Plan, addresses deficiencies in our self-evaluation.

The Plan is intended to guide the DOT&PF's efforts to provide an accessible transportation system program. It is developed to identify deficiencies in DOT&PF policies, procedures, and physical assets and to provide guidance for removing accessibility barriers. The Plan is a living document that will be updated as items noted as deficient are brought into compliance.

What is reported in this Plan is the nexus of what will be an evolving and ever-improving methodology for addressing all barriers to access within DOT&PF's programs and services. This Plan establishes a baseline from which the DOT&PF has and will identify facilities, programs, and services which do not meet current accessibility standards and how the DOT&PF will augment those facilities, programs, and services that will be addressed to ensure accessibility in the future.

The DOT&PF's long-term goal is to develop a transportation system that is accessible to all Alaskans. The DOT&PF is committed to complying with the Americans with Disabilities Act to ensure the state's public right-of-way meet ADA standards and to continue to improve accessibility for pedestrians throughout the state.

Framework for ADA Compliance

Section 504 of the Rehabilitation Act of 1973 prohibits discrimination on the basis of ability by any program or activity receiving federal financial assistance. Discrimination may consist of exclusion from participation in or denial of the benefits of program and activities operated by a department, agency or other instrumentality of state or local government. Section 504 applies to the DOT&PF as well as all sub-recipients of federal funds.

Title II of the Americans with Disabilities Act (ADA) of 1990 expands on the foundation laid by Section 504 by prohibiting discrimination on the basis of ability by public entities regardless of whether they receive federal financial assistance. The ADA is divided into five titles describing requirements relating to employment (Title I), state and local government service (Title II), public accommodations (Title III), telecommunications (Title IV), and miscellaneous provisions (Title V).

Title II applies specifically to state and local government services and the programs and activities they administer, including features built before and after 1990. Titles I, III, IV, and V are not addressed further in this Plan. Under Title II, the DOT&PF must meet these general requirements:

- Operate programs that, when viewed in their entirety, are accessible to and useable by individuals with disabilities.
- Ensure that a person with a disability is not refused participation in a service, program, or activity based solely on that disability.
- Provide reasonable modifications in any policies, practices, and procedures that may

provide equal access to individuals with disabilities unless the result of the changes would fundamentally alter the program.

- Ensure that services and benefits to persons with disabilities are provided in a manner that is not separate or different unless separate or different services and benefits are necessary to ensure the services and benefits are equally effective.
- Ensure that communications with applicants, participants, and members of the public with disabilities are as effective as communications with others.
- Designate an “ADA Coordinator” to coordinate ADA compliance. The DOT&PF must provide the coordinator’s name, office address, and telephone to interested individuals.
- Provide notice of ADA requirements which includes information about the rights and protections of Title II to applicants, participants, beneficiaries, employees, and other interested persons. This notice must include the name and contact information of the ADA Coordinator.
- Establish a grievance procedure that provides for prompt and equitable resolution of complaints and timely resolution of issues related to ADA compliance before they escalate to litigation or the federal complaint process.

Implementing Regulation	Responsibilities
28 CFR 35.105	<p>Self-Evaluation</p> <ul style="list-style-type: none"> • Evaluate current services, policies and practices and make any revisions necessary to meet ADA requirements • Provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities to participate in the self-evaluation process by submitting comments • Maintain a list of interested persons consulted, a description of areas examined, and any problems identified, and a description of any revisions made
28 CFR 35.106	<p>Notice</p> <ul style="list-style-type: none"> • Make ADA information available to the public regarding applicability to DOT&PF services, programs and activities
28 CFR 35.107	<p>Responsible Employee/Grievance Procedures</p> <ul style="list-style-type: none"> • Designate a responsible employee to coordinate ADA efforts – provide the ADA coordinator’s name, office address and telephone number • Adopt and publish grievance procedures providing for prompt and equitable resolution of complaints
28 CFR 35.130; 28 CFR 35.149	<p>General Prohibitions Against Discrimination</p> <ul style="list-style-type: none"> • Do not exclude people with disabilities from participation in or deny benefits of DOT&PF services, programs or activities • Do not discriminate on the basis of disability
28 CFR 35.133	<p>Maintenance</p> <ul style="list-style-type: none"> • Maintain facilities and equipment required to be accessible to persons with disabilities in operable working conditions
28 CFR 35.150	<p>Existing Facilities</p> <ul style="list-style-type: none"> • Operate each service, program or activity in a manner accessible to and useable by individuals with disabilities • Alter existing facilities or construct new facilities as necessary to comply with ADA requirements • Develop a transition plan outlining steps necessary to complete structural changes to facilities
28 CFR 35.151	<p>New Construction and Alterations</p> <ul style="list-style-type: none"> • Design, construct and alter public facilities in a manner readily accessible to and useable by persons with disabilities, unless structurally impracticable • Provide curb ramps or other sloped areas at any intersection having curbs or other barriers to entry from a street level pedestrian walkway
28 CFR 35.160; 28 CFR 35.161	<p>Communications/Telecommunications</p> <ul style="list-style-type: none"> • Ensure effective communications with disabled persons • Provide appropriate auxiliary aids and services to afford disabled individuals an equal opportunity to participate in and enjoy the benefits of DOT&PF services, programs and activities
28 CFR 35.163	<p>Information and Signage</p> <ul style="list-style-type: none"> • Provide information about the existence and location of accessible services, activities and facilities

ADA Program Information

Official Responsible for Implementing the Transition Plan:

The DOT&PF Commissioner is responsible for the implementation of this Plan.

Ryan Anderson, Commissioner
Alaska Department of Transportation & Public Facilities
3132 Channel Drive
PO Box 112500
Juneau, AK 99811-2500

(907) 465-3900



dot.commissioner@alaska.gov



Designation of an ADA Coordinator:

The DOT&PF's ADA Coordinator is responsible for coordinating the efforts of the DOT&PF in complying with ADA responsibilities. The ADA Coordinator is responsible for tracking the Plan's implementation and updates; responding to grievances; ensuring policies and procedures are current; responding to requests for accessible materials or auxiliary aids and services; and conducting or arranging ADA training for the DOT&PF.

Robespierre Howard, Title VI Specialist & ADA Coordinator

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(907) 269-0852



1 (800) 770-6236 inside of Alaska



(907) 269-0847



Notice regarding ADA requirements

The DOT&PF must provide information about ADA requirements as related to the services, programs and activities it makes available to the public.

"It is the policy of the Alaska Department of Transportation & Public Facilities (DOT&PF) that no qualified individual with a disability shall, solely on the basis of his or her disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any of its programs, services, or activities as provided by Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990 (ADA). DOT&PF further assures that every effort will be made to provide nondiscrimination in all of its programs and activities regardless of the funding source, including FTA, FAA, FHWA, and state funds."

- DOT&PF ADA Policy Statement

The DOT&PF maintains an ADA website which includes the ADA Coordinator name and contact information, links to forms and other program resources, the policy statement, information on reasonable accommodations and a grievance procedure.

The webpage provides information on the DOT&PF's ADA program.

<http://www.dot.state.ak.us/cvlrts/ada.shtml>

Adopting and Publishing of Grievance Procedures

The External Complaint Process is designed to informally resolve conflicts involving discriminatory practices under Title VI and related statutes; Section 504 of the Rehabilitation Act of 1973; and Title II of the Americans with Disabilities Act of 1990.

<http://www.dot.state.ak.us/cvlrts/forms/DiscrimComplProcProc.pdf>

Complaints must be filed within 180 days of the last date of the alleged discrimination. The Civil Rights Office will conduct and complete an investigation within 90 days of receiving a complaint.

The Discrimination Complaint form is available on the DOT&PF website

<http://www.dot.state.ak.us/cvlrts/forms/DiscrimComplQuest.pdf> and collects the following information:

1. The complainant's name and contact information
2. The date of the alleged discrimination
3. If an attempt has been made to resolve the complaint at the local level
4. A description of the alleged discrimination
5. Remedies that are sought
6. The complainant's signature

Design Standards

The DOT&PF utilizes the following Standard Plans for pedestrian facilities within the public rights-of-way:

- I-20.14 Curb Cut, Curb & Gutter and Cub Ramp Details standard drawings
- I-21.02 Parallel Curb Ramp
- I-22.02 Perpendicular Curb Ramp
- I-30.10 Accessible Parking

These Standard Plans can be found at the following link:

<https://dot.alaska.gov/stwddes/dcsprecon/standardplans.shtml>

DOT&PF Highway Preconstruction Manual Chapter 11, Section 1100 – Introduction includes the ADA Design Policy which states:

Transportation facilities and their appurtenances constructed in public rights-of-way are required to accommodate those with disabilities. These disabilities include but are not limited to limited mobility, impaired vision, impaired hearing, and cognitive impairments.

Design all new public transportation facilities, including bus stops and stations, and rail stations, to meet the Americans with Disabilities Act (ADA) Standards for Transportation Facilities adopted by the U.S. Department of Transportation (DOT) (2006). Other types of facilities covered by the ADA are subject to the 2010 ADA Standards for Accessible Design adopted by the U.S. Department of Justice (DOJ). 49 CFR 37, Appendix D, Subpart B, Section 37.21 states, “Both rules apply; one does not override the other.

The DOT rules apply only to the entity’s transportation facilities, vehicles, or services; the DOJ rules may broadly cover the entity’s activities. For example, if a public entity operates a transit system and a zoo, DOT’s coverage would stop at the transit system’s edge, while DOJ’s rule would also cover the zoo. DOT and DOJ have coordinated their rules, and the rules have been drafted to be consistent with one another. Should there be an apparent inconsistency between the two rules in the context of some future situation, the DOT rules would control within the sphere of transportation services, facilities, and vehicles.”

Both standards can be found here:

<https://dot.alaska.gov/stwddes/dcsprecon/assets/pdf/preconhwy/chapters/chapter11.pdf>
[ADA Accessibility Standards \(enhanced single file version\) \(access-board.gov\)](https://www.access-board.gov/ada/)

For reconstruction and 3R projects, all new and reconstructed pedestrian facilities must meet ADA standards.

Conducting a Self-Evaluation

The development of a Transition Plan began with an assessment and inventory of existing physical barriers in all facilities managed by the DOT&PF during 2021, 2022, and 2023

In 2022 the DOT&PF increased the evaluating of curb ramps as compared with the previous two years. In 2023, the DOT&PF plans to continue the self-evaluation process by encompassing all forms of pedestrian features to ensure that all necessary facilities are evaluated and included in the Transition Plan. In 2022 data for all pedestrian features within all three regions was compiled into the DOT&PF's ArcGIS database.

Starting in 2023, the ADA Implementation & Monitoring plan will begin and consist of: implementing grading criteria, standards, and regulations for curb ramps and pedestrian feature compliance. To monitor compliance, the ADA Coordinator will contact the region's Construction Manager and Design Engineers and conduct field inspections to meet ADA compliance. If compliance cannot be met, the proper procedures for reporting the non-compliance and why it cannot be completed will be documented and reported to the ADA Coordinator.

Rights-of-Way Evaluation

During the summer, the DOT&PF Civil Rights Office continuously retains interns in order to conduct surveys in all three regions to gather data on DOT&PF's rights of way for compliance and non-compliance of pedestrian features. Using DOT&PF's map layer indicating maintenance responsibility, the intern's evaluated curb ramps and pedestrian features falling within the State's maintenance responsibility using [ADAAG 2010 standards](#) (see attached Curb Ramp Evaluation Forms). Evaluations were done in the major areas of the Northern and Central Region (Fairbanks/North Pole and the Greater Anchorage Area) as well as smaller communities in the Matanuska-Susitna Valley, Tok, Ketchikan, Valdez, Delta Junction, and towns along the Kenai Peninsula. In 2022 evaluations of pedestrian features were expanded in the major areas of the Central, Northern, and Southcoast regions. This data has been collated into a Curb Ramp Inventory spreadsheet and Curb Ramp Inventory Feature Class, which is loaded into ArcGIS by DOT&PF Civil Rights Office ADA Personnel.

Additionally, accessibility data relating to pedestrian push buttons (signals), bus stops, slope and incongruous features of linear elements and point data in the pedestrian right-of-way, and bus stop data on State-maintained sidewalks relating to passenger loading zones were collected throughout the State. Additional features will be added to ArcGIS to identify public facilities along corridors that would help highlight project priority areas.

Linear element data and point data documenting slopes and incongruous features of sidewalks were collected in Anchorage, though not all roads were evaluated. The ADA Coordinator has compiled a Geodata base that all DOT&PF employees can access with ArcGIS access that provides two-axis prioritization criteria of all measured non-compliant/compliant public facilities. In addition, the ADA Coordinator has developed a training video on how to properly measure and provide documentation for newly constructed curb ramps to ensure it is being built to current ADA standards and within compliance. Additionally, FHWA's External Costs of Highway Users Analysis Tool is a tool in an effort to explain how the tool works and equity ratio analysis (the percentage of costs absorbed by a demographic divided by their percentage of the total population within a region).



HPTS_Policy_Brief_EC
AT_Winter2023.pdf

The training video can be found here: <https://www.youtube.com/watch?v=sInICMR-g78>.

Additionally, in the event that a curb ramp cannot be built into compliance, documentation will be required. In that case, a report must be submitted to be included in this transition plan, which can be used to provide a record that the ramp was built to maximum conformance as feasibly possible.

In 2022, the ADA Coordinator received data for all pedestrian features in the Central Region (CR), Northern Region (NR), and Southcoast Region (SC) collected along state-maintained roads. Since then, this data has been integrated and uploaded to the CRO public information map. Additionally, in 2022 interns stationed in the Central Region updated data on projects completed since 2016. Furthermore, all Region's staff will send completed curb ramp and pedestrian feature forms to the ADA Coordinator, which will be uploaded into the ADA Interactive Map.

As part of this self-evaluation, communication gaps were also identified among DOT&PF divisions and regions regarding ADA Accessibility Standards and the locations of deficiencies. To address these deficiencies, the ADA Coordinator, Highway Design & Construction Managers, and the Information System and Services section will continue working to create a Geodatabase using the self-evaluation data and a data pipeline from Design and Construction. The data collected will be forwarded to the ADA Coordinator for periodic updates to the database. The resulting map layers include a data point for each feature evaluated by the Civil Rights Office (CRO) interns or during other DOT&PF projects, including relevant data for ADAAG evaluation. By overlaying these points on the interactive map, Planning, Design, and Construction staff can easily identify the non-compliant facility that should be included in a project's scope.

For elements where total ADAAG compliance is technically infeasible due to topography or other constraints, a Memorandum will be issued from the Project Engineer documenting the locations, the reasoning for non-compliance, and the efforts made to bring the element in compliance to the extent practicable. This memorandum will be stored on DOT&PF's servers, and a link to the file will be available from the relevant feature.

Barrier Prioritization

The DOT&PF is committed to developing prioritization criteria that places technical non-compliance within a social geography by giving precedence to providing accessible routes to government services, schools, transit, and in areas of high disability.¹ Individual criteria will be developed for each element along with a scoring system and the aggregate scores of given areas will help determine which routes receive priority for upgrade.

Features are prioritized both by technical components and social factors using two sets of criteria. The technical criteria will be molded as new technical accessibility issues are identified and categorized, and the social factors will be updated as new data becomes available.

Prioritization Criteria

1. High pedestrian traffic.
2. Bus route and/or above average pedestrian traffic.

3. Residential area with public pedestrian traffic.
4. Residential area with local pedestrian traffic.
5. Rural area with little to no pedestrian traffic.

Area Rule: While features receive individual scores, the DOT&PF will prioritize barrier removal projects based on area data, the area being assigned the highest priority level it contains.

Area of High Disability: is defined as (# of users aged 5+ who experience a disability/ total area population) according to the American Community Survey; is determined by statewide percentiles.

¹ Disability data is collected by the American Community Survey

10-Point Grading Criteria

The ADA Accessibility Guidelines (ADAAG), Public Rights-of-Way Accessibility Guidelines (PROWAG), and the Manual of Uniform Traffic Control Devices (MUTCD) detail various design and installation features necessary to meet the mandated accessibility needs. Therefore a 10-point grading criterion that includes both ADAAG and PROWAG provides a more relevant application of accessibility requirements to street settings than the current standards ADAAG which is more applicable to design features within the building and recreational facilities.

Here is the PDF for the [10-Point Grading Criteria](#).

Barrier Removal

The self-evaluation data collected notes about ADA deficiencies. The CRO continues to work with both design & construction in all regions to continually address and update deficient pedestrian features. According to 28 CFR § 35.151 and DOT&PF policy, all new construction and/or significant modifications of existing facilities must provide ADA-compliant features as necessary unless such features are technically infeasible due to site constraints. All infeasible features in the scope of new projects will be documented.

Implementation Plan and Schedule

The DOT&PF will continue to collect data and update the Plan including the associated geodatabase. The DOT&PF will utilize a multi-disciplinary approach to implement the Plan, including the personnel responsible for policy development, public involvement and outreach, project design and development, and maintenance and operations.

Immediate Activities (2023)	<ul style="list-style-type: none">• Collection of pedestrian facility data in the public rights-of-way will continue to be completed, prioritized and integrated into the Transition Plan.• Continue to involve stakeholders in the process and have meetings as necessary.• Conduct training sessions for DOT&PF personnel on the Transition Plan and their role in its implementation.• Update ADA Transition Plan with current data.• See the current data here.
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Short Term Activities (2023 – 2024)	<ul style="list-style-type: none"> • Continue data collection for accessible routes in the public rights-of-way. • Provide quarterly updates on the Transition Plan to leadership and stakeholder groups. • Ensure website updates are done correctly. • Refine the data collection process as needed. • Ensure all new projects include ADA upgrades and associated processes are documented in the plan.
Long Term Activities (2024 and beyond)	<ul style="list-style-type: none"> • Make updates to the Transition Plan as needed. • Ensure new projects are meeting applicable accessibility standards through trainings and internal communication.

Public Stakeholder Outreach

A public entity that employs 50 or more people is required to seek public input on its Plan; the DOT&PF considers this input integral to ensuring that those affected by its programs, services and facilities understand DOT&PF’s responsibilities in providing equal access to all persons.

Next Steps

The DOT&PF has undertaken this process with an understanding that continuing outreach, data collection and process modifications are going to be required to ensure that all facilities in the public rights-of-way are fully accessible.

Existing facilities that have been identified as non-compliant will need to be addressed at the scoping level for projects listed in the Statewide Transportation Improvement Plan (STIP), the DOT&PF’s four-year project planning document. The DOT&PF will determine if the needed improvements will be an element of a larger project or if a stand-alone project specifically addressing improvements should be schedule

Alaska Department of Transportation & Public Facilities: ADA Projects

Future Measurements

To maintain the ADA Measurement Database and to expand it to include all ADA features, the following should be accomplished:

1. Evaluation of data collected by the CRO in Summer 2022. The CRO collected data that is not currently in the ADA Measurement Database. In particular, the CRO data on sidewalks, crosswalks, and bus stops should be evaluated to ensure all applicable measurements were taken. If all practical measurements were taken, the information should be transferred into the ADA Measurement Database and analyzed. If all measurements were not taken, those features would have to be measured and added to the ADA Measurement Database. How those features are rated and included in the ADA Measurement Database will have to be developed.
2. Measure any features from the 2021 and 2022 construction seasons built by DOT&PF and include that information in the ADA Measurement Database.
3. As each construction project is built, the ADA features on that project should be measured by preconstruction or field personnel, and the information should be transferred into the ADA Measurement Database. The measurements should be saved in hard copy electronically and moved to the Excel database. The GIS and Google Earth KMZ files will also need to be updated periodically. To assist in this process, typical curb ramp measurement forms have been developed to ensure all required data is collected. Refer to the Field Measurement Forms in Appendix C. Additionally, instructions to update the field measurement records, Excel Database, GIS file, and Google Earth file have also been included in Appendix C.

Ratings

In order to assist in the analysis of the ADA compliance of each feature measured a rating system was developed. This rating system is modeled after the rating system utilized by the Civil Rights Office Transition Plan but has been modified for two specific reasons:

1. To be consistent with the ADA Design Policy in the Alaska DOT&PF Highway Preconstruction Manual (HPCM) and Chief Engineer's Directive (CED).
2. To result in a more diverse range of ratings among the features measured which allows for easier analysis and evaluation of where non-compliant features should be prioritized to be reconstructed first.

Each feature is assigned a rating as shown in Table 1 – Rating Definitions. Refer to the table in Appendix G – Rating Criteria for a full listing of what constitutes each rating. The lowest rating (higher severity) of any particular measurement represents the overall rating of that ADA feature (i.e. if a curb ramp had a ramp running slope with a measurement that constituted a Rating 4 but the counter slope constituted a Rating 2, the curb ramp was overall given a Rating 2).

Rating 1	Missing/Unpassable Accessible Pathway or Safety Issue (non-compliant)
Rating 2	Critical Accessibility Issues (non-compliant)
Rating 3	Major Accessibility Issues (non-compliant)
Rating 4	Minor Accessibility Issues (non-compliant)
Compliant	

The pedestrian facilities in the following projects have been upgraded to ADA design standards:

Northern Region: Fairbanks: 6th Avenue (Project #: NFHWY00551)

The project’s purpose is to reconstruct existing sidewalks as needed along 6th Avenue between Cushman Street and Noble Street to meet Americans with Disabilities Act (ADA) requirements. The project need, as identified in the Northern Region ADA Reconnaissance Study, is that the existing pedestrian facility along 6th Avenue does not meet ADA design standards.

Northern Region: Fairbanks 3rd Street Widening (Project #: MGL-M-067(1)/62541)

The purpose of widening the 3rd Street and Steese Expressway intersection is to improve traffic flow and reduce the crash rate at the intersection, which is currently almost double that of the statewide average for similar intersections. The addition of the roundabout at 3rd Street and Eagle Avenue will help alleviate the long queues experienced during peak hours.

Northern Region: Growden Area Accessibility Improvements (ATAP) (Project #: 0002453/NFHWY00454)

The purpose of this project is to provide a non-motorized route with ADA access to the park facilities, linking the surrounding neighborhoods and the larger community facilities in the process.

Central Region: AMATS Downtown Trail Connection Project (Project #: 0001662/CFHWY00586)

The AMATS Downtown Trail Connection Project will connect the Tony Knowles Coastal Trail and the Ship Creek Trail in Downtown Anchorage to form a 14-mile continuous non-motorized, multi-use corridor. This over one-mile connection will complete the most high-profile missing link identified in the Anchorage Areawide Trails Plan (1997) and is supported by the MOA Non-Motorized Plan.

The Project will provide ADA compliant non-motorized access to the small boat launch and maximize utility and safety. The Downtown Trail Connection Project will go through the Municipality of Anchorage's trail review process with community involvement, Parks and Recreation Commission and approval by the Urban Design Commission.

**Central Region: AMATS Fish Creek Trail Connection Project
(Project #: CFHWY00587)**

The purpose to construct a new multi-use trail connecting the Fish Creek and Tony Knowles Coastal Trails through the AMATS: Fish Creek Trail Connection Project in Anchorage, Alaska. As shown in the project area map, the new trail is proposed between the existing Fish Creek Trail pathway at West Northern Lights Boulevard north to the existing Coastal Trail pathway near Fish Creek.

This project will consist of the following components:

- Non-motorized facilities
- Coastal erosion protection
- Safety features
- Drainage
- Excavation
- Pavement
- Roadside hardware
- Signing and striping
- Americans with Disabilities Act (ADA) features

Central Region: CTF Alternative Entrance Alignment (Project #: AKBLM AFO 2014(1) / CFHWY00260)

The proposed project will include constructing a fourth approach to the existing intersection at Elmore Road and East 68th Avenue and realignment of BLM Road from this intersection to an internal junction on the Campbell Tract Facility.

- Additional project scope may include:
 - 6' Shared use shoulders for multi-modal access to the trail systems
 - Additional offset left turn lane southbound on Elmore onto BLM Road
 - Converting East 68th Avenue approach to accommodate through movement
 - Expansion of the Smokejumper trailhead parking area
 - Americans with Disabilities Act (ADA) compliant pedestrian facilities
 - Sidewalk replacement and drainage improvements, as needed
 - Obliteration of the existing CTF BLM Road entrance to Elmore Road
 - New signage and striping
 - Relocating and constructing utilities, as needed
 - Clearing and grubbing, as needed
 - Topsoil and seed all disturbed areas once construction is complete.

Southcoast: JNU Mendenhall Loop Rd Egan to Stephen Richards Resurface (Project # 0966028/SFHwy00261)

The purpose is to Resurface JNU Mendenhall Loop Road and Egan to Stephen Richards.

Associated preventative maintenance JNU Mendenhall Loop Road and Egan to Stephen Richards. Associated preventative maintenance activities may include minor structural section improvements, signals and lighting, drainage repairs, striping, signs, and ADA improvements. Project Locations and Length: In Juneau, Alaska along Mendenhall Loop Road from Egan Dr to the Stephen Richards roundabout improvements for a length of 0.972 miles.

Project Outcomes:

This project modified three of the four curb ramps at the intersection of Mall Road and Mendenhall Loop Road in Juneau. Unfortunately, the project could not make the intersection fully ADA-compliant due to the existing site conditions that would expand the work beyond the available scope and funding. The primary issues are with the traffic junction boxes that are within and adjacent to the ramp. Correcting this issue will require the replacement of the junction boxes, wiring, and likely the conduit through the intersection, as well as regarding the approaches to meet the cross-slope requirements. Infeasibility notes:

<https://dot.alaska.gov/cvlrts/docs/extra/Curb-Ramp-Inspection-Atlin-Dr-South.pdf>

<https://dot.alaska.gov/cvlrts/docs/extra/Curb-Ramp-Inspection-Atlin-Dr-North.pdf>

<https://dot.alaska.gov/cvlrts/docs/extra/Curb-Ramp-Inspection-Mall-Rd.pdf>

Southcoast: Gustavus Airport Runway, Apron and Taxiway Pavement Rehab (Project #Z675170000)

The Gustavus airport project is needed to maintain the airport and addresses Federal Aviation Administration (FAA) safety concerns. One concern is that extensive cracking in aging pavement on runways and other paved areas used by aircraft increases the risk of damage to aircraft as the pavement condition worsens. The other main concern is that aircraft use designated taxiways when moving between aircraft parking areas and the runway. The Gustavus airport does not have designated taxiways for the shorter crosswind runway.

Project Outcomes:

- Resurface and rehabilitate existing taxiways, aprons, and runways
- Add new taxiways F and G
- Install lighting for new taxiway F
- Expand paved aircraft parking area enough to make up for existing paved areas that will be converted to designated taxiways
- Replace existing aircraft tie downs and install new tie downs in new aircraft parking areas
- Cut grooves for improved traction on new runway pavement
- Pavement striping

Southcoast: Douglas Highway Resurface & Sidewalk Repair (Beginning 2021) (Project #SFHWY-00058)

The purpose of the proposed project is to improve and resurface approximately 2.5 miles of Douglas Highway from St. Ann's Avenue to Egan Drive including upgrades to the roundabout and bridge surface. The project will repair various elements of the existing road infrastructure such as sidewalks and curbs, culverts and drainage, and signage.

Project Outcomes:

- Prolong the life of Douglas Highway's Road surface
- Maintain adequate drainage features
- Bring the pedestrian facilities into compliance with the Americans with Disabilities Act (ADA)

Proposed Improvements:

- Reconstruct pedestrian ramps, driveways and sidewalks to be ADA compliant
- Reconstruct 3rd Street from St. Ann's Avenue to I Street
- Resurface Douglas Highway from I Street to Egan Drive
- Resurface the roundabout
- Resurface Douglas Bridge and level existing bridge joints
- Repair some structural retaining walls and replace damaged handrails
- Upgrade highway guardrail and bridge rail
- Upgrade sign supports
- Replace striping
- Upgrade drainage

Southcoast: Ketchikan Herring Cove Bridge Improvement Project #SFHWY00072/ 0902043)

The purpose of the proposed project is to replace existing bridge with a new structure that includes pedestrian walkways on both sides.

Proposed Improvements:

- Realignment of the Wood Road intersection.
- Rehabilitation of the road and pavement section on South Tongass Hwy between Wood Road and Powerhouse Road intersections, including guardrail, striping, signing, drainage improvements, and other safety related improvements.

Southcoast: Juneau Glacier Highway (Lemon Creek) Improvements

(Project #Z681240000 / 0955016

The purpose of the proposed project is to resurface and improve Glacier Highway from Glacier Highway Access Road to the intersection with Vanderbilt Rd and Glacier Highway.

Proposed Improvements:

- Improve pedestrian and bicyclists' travel lanes and crossings.

- Improve the flow of vehicular traffic through the project area

The following SC projects were completed in 2022:

- SDRER00409 JNU Thane Road 00039 DEC 20 SE PR
- SFHWY00241 / 0003243 JNU Resurface Glacier Hwy: Vanderbilt Hill Road Egan to Glacier Hwy
- Z693930000 / NH-0932(047) JNU Egan Drive Improvements - Main to 10th St.
- SFHWY00104 / 0003218 KDK Harbor Channel Bridge Improvements

Public Data Portal

The CRO is using an Esri’s Story map to produce the public data portal for the ADA Transition Plan. With the use of the Esri Story map in conjunction with Esri Field Maps, data can be collected and added to the public data portal. Additionally, data collected in NR, CR, and SC prior to 2022 has been compiled and added to the Esri story Map public data portal.

The DOT&PF’s ultimate goal is to complete improvements that provide a continuous and accessible pedestrian route while conducting improvements in proximity to other non-compliant facilities and ensuring facilities of the highest priority are addressed as soon as feasibly possible. The DOT&PF believes that all needed upgrades in the major urban areas (Anchorage, Fairbanks, and Juneau) should be incorporated into the planning process and the public participation plan. These estimates, however, are heavily dependent on available funding and may be changed depending on the fiscal climate.

2020-2023 Official STIP

This Plan intends to identify system needs and integrate them into the DOT&PF’s planning process through the [STIP.pdf \(alaska.gov\)](#). In order to ensure compliance with this Plan, the DOT&PF should reference the Plan when determining project selection and development of project scope.

Amendment 5 to the 2020-2023 Alaska Statewide Transportation Improvement Program (STIP) was approved on November 21, 2022. The STIP is developed in compliance with Title 23 - Section 135 and the state planning regulations (17 AAC 05.195).

Amendment 5 updates scope, funding, and scheduling estimates for various projects around the state. It includes a statement of the state funds budgeted to adequately operate and maintain the surface transportation system. None of these projects will require an update of the air quality non-attainment conformity analysis.

With changes to projects and the STIP, it is imperative that the Plan is frequently updated and published. In addition, periodic updates should be used to monitor the level of existing compliance and continue to assess projects to determine if additional areas require accessibility improvements.

Accessible Routes: Inventory Database

The DOT&PF will use the ADA Transition Plan geodatabase to measure overall compliance, provide compliance information to design staff for new construction and alteration projects requiring curb ramp upgrades under 28 CFR § 35.151, and assist planning staff in developing ADA compliance projects. The database has been developed through a joint effort and the pedestrian facility inventory is maintained through the ArcGIS platform. All of the self-evaluation data is included in this database, including surveys done by both CRO staff and engineering staff during the Design Study Reports for upcoming projects. Each data point in the inventory database will include compliance data, photos of the site, site evaluations and/or memorandum of technical infeasibility. As the CRO continues to evaluate accessible routes in Alaska this database will be updated and expanded.

Database Implementation Schedule

May-August 2015	Preliminary data collection
August 2015	<ul style="list-style-type: none"> Developed curb ramp database in ArcGIS for upload through DOT Server.
September 2015 – March 2016	<ul style="list-style-type: none"> Validated data and outlined evaluation needs for summer 2016. Moved inventory sheets and photos to EDOCS platform. SER ADA Project Data collection and App development. ADA Coordinator utilized local database to perform query requests from planning and design staff as needed.
April-May 2016	<ul style="list-style-type: none"> Integration of SER ADA Project data into database. Database goes live for DOT&PF Staff. Development of ADA Transition Plan Public Data portal through Story Maps.
Summer and Fall 2016	<ul style="list-style-type: none"> Continued accessible route evaluation by CRO. Updating features that were re-constructed during the 2016 season.

2016-2019	<ul style="list-style-type: none"> • Develop a streamlined process to make database more self-regulating for planning and design staff.
2017-2019	<ul style="list-style-type: none"> • Continue data collection in all regions. • Expanded data collection from curb ramps to all pedestrian features (ped-signal, utilities, curb ramps, sidewalks,
2019-2023	<ul style="list-style-type: none"> • Field Maps replaced Geoforms • Educate staff and implement the use of Field Maps across all the DOT&PF. • Monitor and QC Field Maps data within the ADA website. • Update stakeholders on data gathered within the Field Maps forms. • Update transition plan as needed. • Input data received from private sector partners and DOT&PF sections on ADA relevant facilities. (Engineering, Construction, Design)

Curb Ramp Evaluation: Summer 2022

DOT&PF Civil Rights survey crews based in Anchorage, Fairbanks, and Juneau collected curb ramp and linear element data for the twenty most populous cities in Alaska not currently under the scope of another project.

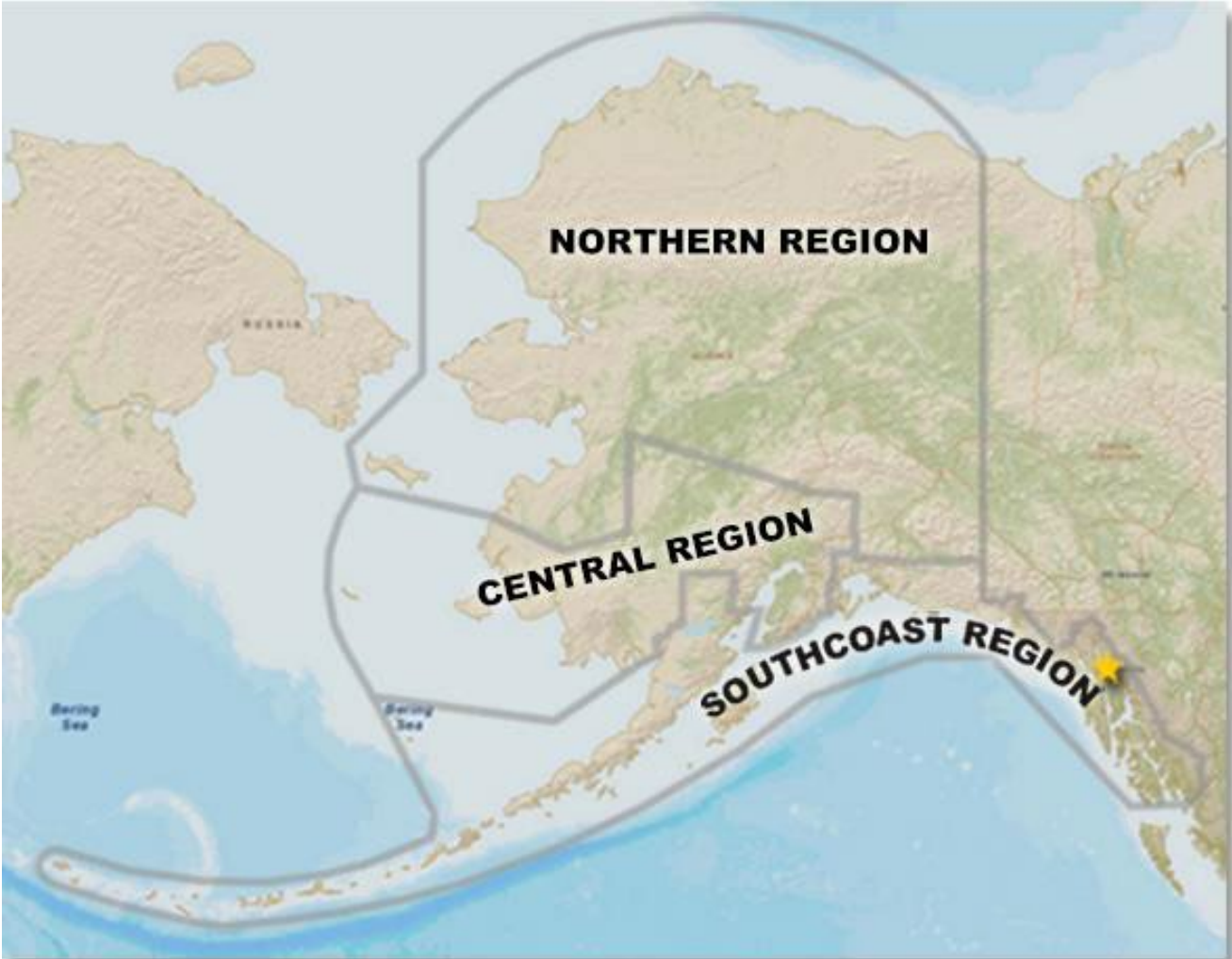
According to the [2020 US Census](#) the most populous cities in Alaska are:

Area	Region	Population	Status
Muni. of Anchorage	Central	291,247	Surveyed 2022- Current
Fairbanks North Star Borough	Northern	95,655	Surveyed 2022 - Current
Juneau	Southcoast	32,255	Surveyed 2022, Southeast Region (SER) ADA Project
Sitka	Southcoast	8,458	Surveyed 2020, SER ADA Project
Ketchikan Gateway Borough	Southcoast	13,948	Surveyed 2020, SER ADA Project
Wasilla	Central	9,054	Surveyed 2021
Kenai	Central	7,424	Surveyed 2020
Kodiak	Southcoast	5,581	Surveyed 2021, Upgrades will be part of SER ADA project
Bethel	Central	6,325	Lacks ADA-applicable pedestrian facilities due to geology
Palmer	Central	5,888	Surveyed 2021
Homer	Central	5,522	Surveyed 2021
Unalaska	Southcoast	5,232	SER ADA Project
Utqiagvik (Barrow)	Northern	11,031	Lacks ADA-applicable pedestrian facilities
Soldotna	Central	4,363	Surveyed 2020
Valdez	Southcoast	3,972	Surveyed 2020, Upgrades will be part of Southcoast ADA project
Nome	Northern	3,643	Surveyed 2015, SER ADA Project
Kotzebue	Northern	3,181	Lacks ADA-applicable pedestrian facilities
Petersburg	Southcoast	3,170	SER ADA Project
Seward	Central	2,584	Surveyed 2018
Wrangell	Southcoast	2,130	SER ADA Project

Curb Ramp Replacement Costs

To estimate the total cost of a curb ramp replacement, a DOT&PF project manager reviewed curb ramp replacements over the last four years and came up with a figure of \$10,000 for a total curb ramp replacement and \$3,000 to replace a detectable warning. This includes the total project costs from design to final construction. While we anticipate variation in total costs, the cost estimates are based on these figures.

DOT&PF Regions



Northern Region



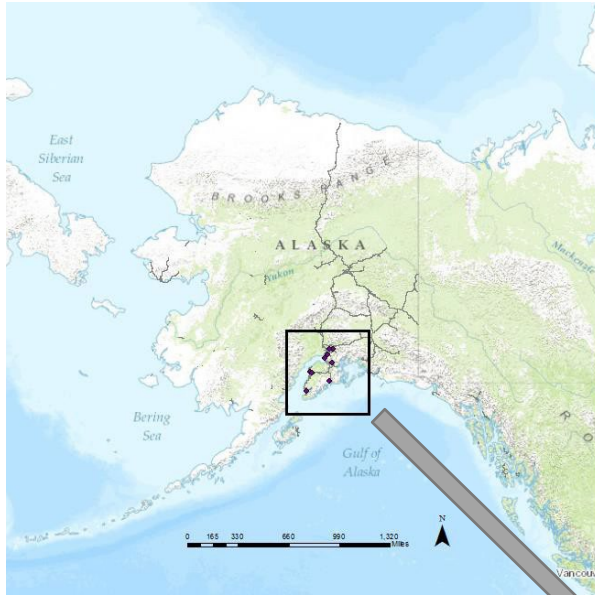
Northern Region Curb Prioritization

Of the **11** curb ramps in Northern Region evaluated as part of the 2022 evaluation **10** were found to be non-compliant. Of those 10, **none** are within the scope of an already existing project leaving **10** to be addressed through either the Southcoast Region ADA Compliance Project (30397) or another upcoming project. The curb ramps that were found to be non-compliant were documented within the map to be further addressed within Northern Region ADA Upgrades.

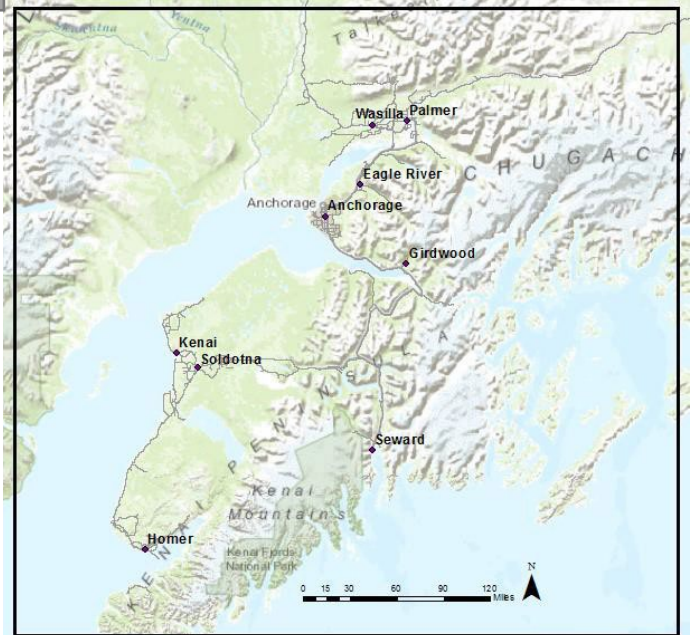


<i>Priority Level</i>	<i>Criteria</i>	<i>Regional Count</i>
1	High pedestrian traffic.	0
2	Bus route and/or above average pedestrian traffic.	0
3	Residential area with public pedestrian traffic.	0
4	Residential area with local pedestrian traffic.	164
5	Rural area with little to no pedestrian traffic.	1
	More data is needed for prioritization	0
	Total	165

Central Region



Central Region is the population, economic and transportation hub of the State. The State maintains significantly more road and pedestrian facilities in Central Region than in any other region. The region faces challenges associated with rapid growth and an aging infrastructure and is moving towards a transportation system that accounts for growth in non-traditional commuter methods, such as cycling.



Central Region Curb Prioritization

Of the **210** curb ramps in Central Region evaluated as part of the 2022 evaluation **175** were found to be non-compliant. Of those 175, **none** are within the scope of an already existing project leaving **210** to be addressed through either the Southcoast Region ADA Compliance Project (30397) or another upcoming project. Of the curb ramps in Central Region evaluated as part of the 2021 and 2022 evaluation the curb ramps that were found to be non-compliant were documented within the map to be further addressed within Central Region ADA Compliance Project (30397). Below some of the data from 2019-2021.

[CFHWY00285-ADA-Transition-Memo](#)

[CFHWY00237-ADA-Transition-Memo](#)

[CR-ADA-Transition-Memo-Dillingham-Downtown-Streets-Rehab](#)

[Parks-48-52-CR-ADA-Transition-Memo](#)

[00379-CR-ADA-Transition-Memo-signed](#)

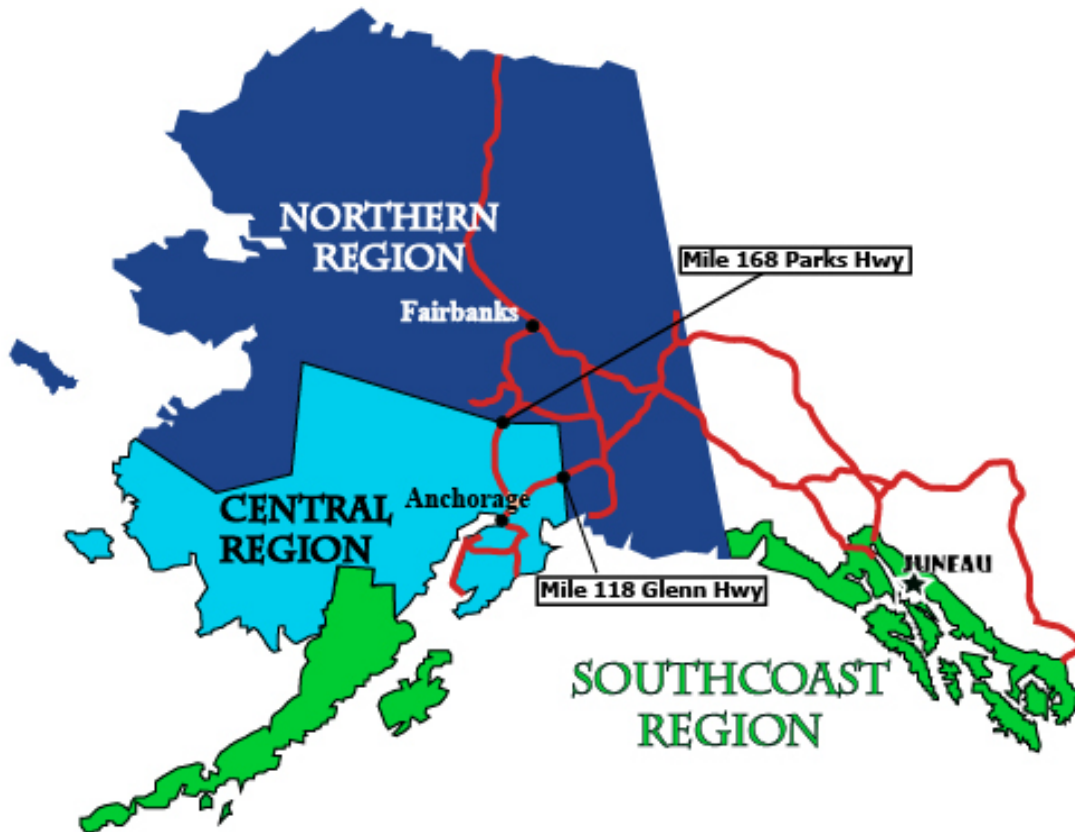
[00381-ADA-Transition-Memo-with-Appendix](#)



<i>Priority Level</i>	<i>Criteria</i>	<i>Regional Count</i>
1	High pedestrian traffic.	29
2	Bus route and/or above average pedestrian traffic	194
3	Residential area with public pedestrian traffic.	628
4	Residential area with local pedestrian traffic.	662
5	Rural area with little to no pedestrian traffic.	0
	More data is needed for prioritization	2
	Total	1515

Southcoast Region

From 2017 through 2022 DOT&PF CRO interns have been traveling through various parts of the Southcoast Region to document any and all pedestrian features on state owned projects to ensure ADA compliance.



Southcoast Curb Prioritization

Of the **40** curb ramps in Southcoast evaluated as part of the 2022 evaluation **39** were found to be non-compliant. Of those 39, **none** are within the scope of an already existing project leaving **40** to be addressed through either the Southcoast Region ADA Compliance Project (30397) or another upcoming project.



<i>Priority Level</i>	<i>Criteria</i>	<i>Regional Count</i>
1	High pedestrian traffic.	47
2	Bus route and/or above average pedestrian traffic.	49
3	Residential area with public pedestrian traffic.	48
4	Residential area with local pedestrian traffic.	9
5	Rural area with little to no pedestrian traffic.	0
	More data is needed for prioritization	0
	Total	153

A direct result of this documentation is a publicly accessible resource to allow all residents of Alaska to visually see and understand the ADA compliance of their town, city, borough...etc. The CRO works closely with IT/ ArcGIS to ensure the interactive map is user-friendly and continuously monitors the platform for functionality. The project identified the compliance issues and allowed construction crews to quickly and effectively solve the problem. The CRO continues to work closely with all to explore how ADA deficiencies can be best resolved.

Appendices

Appendix A: DOT&PF ADA Transition Plan Working Group

- ❖ Engineering /Construction
 - Planning
 - Ivet Hall
 - Jennifer Wright

- ❖ Central Region
 - Kevin Jackson
 - Chris Post
 - Steven Rzepka
 - Erica Moore

- ❖ Southcoast Region
 - DOT&PF
 - Engineering
 - Construction
 - Design

- ❖ Statewide
 - Civil Rights
 - Robespierre Howard
 - Natalia Fricke
 - Information system (ArcGIS)
 - Garry Remsberg

Appendix B: Alaska Department of Transportation & Public Facilities Title VI Nondiscrimination Policy Statement

“It is the policy of the Alaska Department of Transportation and Public Facilities (DOT&PF) that no one shall be subject to discrimination on the basis of race, color, national origin, sex, age, or disability, regardless of the funding source, including Federal Transit Administration, Federal Aviation Administration, Federal Highway Administration, Federal Motor Carrier Safety Administration and State of Alaska funds.”

² http://dot.alaska.gov/tvi_statement.shtml

Appendix C - Outcome:

Outcome

The GIS-enabled web application allows project managers and CRO personnel to layer current projects in Design and Construction status with our statewide pedestrian feature inventory to aid in determining which facilities in their project scope are not in compliance and which features need to be augmented in order for them to meet the ADAAG standard. This additional information will assist the project manager during the design process to ensure that all pedestrian facilities are ADA compliant upon project close-out, lessening project costs by reducing the need to revisit recently completed project sites. All facilities will contain attribute data so that non-compliant features will be easily identified. This information will also assist the Civil Rights Office (CRO) to meet FHWA ADA compliance reporting requirements by allowing the CRO to see which projects have been completed in the last year and which are slated for the upcoming season. This plan allows members of the public to view standards and processes in which the DOT&PF operates by for ADA compliance.

Justification

The continued evaluation approach to the pedestrian facility and project location integration was selected because it is a simple approach that is cost-effective and provides a great benefit. The ArcGIS Server is in place and the required data is easy to integrate within ArcGIS. This project and the data gathered will provide project managers and the public a significantly easier way to view project locations and see which public facilities are in need of design consideration and accessibility for all pedestrians.

Field Measurement Forms:

<https://dot.alaska.gov/cvlrts/docs/extra/CR-ADA-Curb-Ramp-Inspection-Forms-2019.pdf>

<https://dot.alaska.gov/cvlrts/docs/extra/NR-Curb-Ramp-Parallel.pdf>

<https://dot.alaska.gov/cvlrts/docs/extra/NR-Curb-Ramp-Perpendicular.pdf>

<https://dot.alaska.gov/cvlrts/docs/extra/NR-Curb-Ramp-Unidirectional.pdf>

Strategic Alignment

The Project Location and Pedestrian Facilities project is in direct support of the DOT strategic goals. By directly supporting these goals, this project will improve our business and help move the Department forward.

Goals/Objectives	Relationship to Project
Reduce Costs.	Providing an efficient method for managers to interact with pedestrian facility compliance on their projects will reduce costs during the design process by reducing required staff time. Additionally, non-compliant curb ramps can be replaced under larger projects, reducing (de)mobilization costs.
Promote service-based management of state-owned transportation assets and facilities.	Managers will be able to easily view pedestrian facility conditions and compliance during the design process. This will promote service-based management of our pedestrian facility assets.
Strengthen our efficiency and effectiveness at planning, designing, constructing, operating and maintaining all modes of transportation.	This tool will assist in the design and planning process by allowing any DOT employee to view pedestrian facility/ curb ramp conditions and view photos of them in an easy and intuitive manor.
Provide for the safe and efficient movement of people and goods.	Compliance with ADA standards is required unless it can be shown it is impractical to do so. This project will make where compliance has been or has not been met transparent and documented.
Ensure transportation services are provided in a non-discriminatory manner.	ADA compliant pedestrian facilities/ curb ramps are required so all individuals can use public sidewalks. This tool will provide a platform to communicate DOT&PF's efforts in this arena across projects and regions.

Appendix D: DOT&PF ADA Transition Plan Public Stakeholders List

- People Mover (Anchorage)
 - Paul Deery
- Anchorage Metropolitan Area Transportation Solutions (AMATS)
 - Aaron Jongenelen AMATS Coordinator
- State of Alaska Department of Administration
 - David Newman, Statewide ADA Coordinator
- Alaska Mobility Commission
 - John Kern, Executive Director
- University of Alaska, Anchorage
 - Sara Childress, ADA Compliance Specialist
- MACS Transit (Fairbanks)
 - Glenn Miller, Director
- Fairbanks Area Surface Transportation (FAST)
 - Jackson Fox, Director
- Access Alaska
 - Christine Sundly, Program Director
- Alaska Department of Military and Veterans Affairs
 - Caroline Russel, ADA Coordinator
- Alaska Department of Health and Social Services
 - Amy Burke, ADA Coordinator

Appendix E: ADA Transition Plan

Timeline of Activities

April 2015	Teleconference with key DOT&PF staff discussing plans for data collection.
April 2015	Teleconference for external stakeholders discussing barriers to access in Alaska's transportation system.
June 2015	Opened comment period seeking input on barriers to access in Alaska.
June/July 2015	Held public forums in Anchorage, Fairbanks, and Juneau.
August 2015	Draft of Plan submitted to FHWA, plan available upon request to DOT&PF staff and stakeholders.
December 2015	Plan published on DOT&PF website, invitation for public comment sent to MPOs, mobility coalitions, local ADA commissions.
Spring/Summer 2016	ADA Transition Plan Website goes up.
Fall 2016/Spring 2017	Begin uploading of ADA field data into the interactive map.
Spring/Summer 2017	Continuation of data collection of pedestrian features for compliance.
Fall 2017/Spring 2018	Continuation of data collection of pedestrian features for compliance.
Summer 2018 – Summer 2019	Continuation of data collection of pedestrian features for compliance and update interactive map to include all data gathered to this point. *The Sidewalk layer and the No Accessible Routes layer for 2019 has been deprecated.
Summer 2020	Continuation of data collection of pedestrian features for compliance. *The AKDOTPF Route Data-Overall Routes and Alaska Route Number layer is unavailable.
Summer 2021	Continuation of data collection of pedestrian features for compliance. *No Accessible Route layer for 2021 has no service attached to it. The Island layer for 2021 is unavailable. The World Boundaries and Places, the World Transportation and the World Topographic layer have been deprecated.
Summer 2022	Continuation of data collection of pedestrian features for compliance.

ADA Curb Ramp Training video



Click [here](#) to watch the full clip.

Dissemination of the Plan

As of December 2022, the Plan has been made widely available to the public. Data for this Plan has been collected as far back as 2015 and during the summer of 2023 more information will be added. The ADA Public Interactive Story Map is located [here](#).

Appendix F – Northern Region Rating Criteria

Rating	ADA Features	Measurement
1 Missing/ Unpassable Accessible Pathway, or Safety Issue	All	Sections of missing or damaged Accessible Route which prevent navigation
	406.5 Curb Ramps	Curb ramp location projects into vehicular traffic lanes.
2 Critical Accessibility Issues	302.3 Openings	Cracks or openings > 5” in width
	303 Changes in Level	Vertical transitions > 2” in height
	403 Walking Surfaces	Walking surface running slope > 15%
		Walking surface cross slope > 8%
	405 Ramps	Ramp running slope > 15%
		Ramp cross slope > 8%
		Ramp landing slope (either direction) > 8.3%
		No ramp landing present
	406 Curb Ramps	Missing handrails for rise > 3’
		Curb ramp running slope > 15%
		Curb ramp & lower landing cross slope > 8%
		Curb ramp counter slope > 15%
		Depressed Curb slope > 25%
		Curb ramp location projects into parking spaces or parking access aisles
	3 Major Accessibility Issues	Curb ramps at marked crossings not wholly contained within painted markings (excluding side flares)
		For diagonal curb ramp only, < 48” turning space in traffic lanes/painted traffic markings (see 406.6)
302.3 Openings		Cracks or openings > 2” in width
303 Changes in Level		Vertical transitions > 1” in height
304 Turning Spaces		Turning space < 60” if circular shaped, or turning space < minimum required dimensions for T-shaped
307 Protruding Objects		Protruding object reduces clear width required of accessible route.
309.1 Clear Floor Space		Clear Space Slope > 5% or does not have a firm/stable/slip resistant surface
308 Reach Range		Operable part not within reach range
403 Walking Surfaces	Walking surface running slope > 10%	
	Walking surface cross slope > 5%	
	Walking surface width < 32”. Walking surface width < 36” and does not comply with 403.5.1 for reduced width requirements	
405 Ramps	Ramp running slope > 10% (not including exceptions as stated in 405.2)	
	Ramp cross slope > 5%	
	Ramp width < 32”	
	Ramp rise > 42”	
	Ramp landing slope (either direction) > 5%	
	Ramps missing handrails for rise > 2’	
	No edge protection on ramps that require handrails	
Ramp landings not designed to prevent the accumulation of water		
406 Curb Ramps	Curb ramp running slope > 12.5%	
	Curb ramp & lower landing cross slope > 5%	
	Curb ramp width < 32”	
	Curb ramp counter slope > 10%	

4 Minor Accessibility Issues		Depressed Curb slope > 15%
		Curb ramp flare slopes > 20%
		Curb ramp upper landing does not exist if required to be present
		Detectable warnings not present
		Landings not designed to prevent accumulation of water
		Surface not firm/stable/slip resistant
	302.3 Openings	Cracks or openings > 0.5" in width
		Elongated opening not perpendicular to travel direction
	303 Changes in Level	Vertical transitions > 0.25" in height with no bevel
	307 Protruding Objects	Protruding object exceeds ADA allowances in the circular path
	309.1 Clear Floor	Clear Space Slope > 2%
	403 Walking Surfaces	Walking surface running slope > 5%
		Walking surface cross slope > 2%
	405 Ramps	Walking surface width < 36" and does not comply with 403.5.1 for reduced width requirements
		Ramp running slope > 8.3% (not including exceptions as stated in 405.2)
		Ramp cross slope > 2%
		Ramp Rise > 30"
		Ramp width < 36"
		Ramp landing slope (either direction) > 2%
		Ramp landing < 60" x 60" (if changing directions) or <60" x ramp width (if one direction)
Missing handrails for rise > 6"		
406 Curb Ramps	Change in level, other than running slope and cross slope, present in ramp or ramp landing	
	Curb ramp running slope > 8.3%	
	Curb ramp & lower landing cross slope > 2%	
	Curb ramp width < 36"	
	Curb ramp counter slope > 5%	
	Depressed Curb slope > 8.3%	
	Curb ramp flares > 10%, or 8.3% if no upper landing.	
	Curb ramp upper landing length < 36"	
	Curb ramp upper landing width < width of curb ramp	
	For diagonal curb ramp only, < 24" between flared side and inside of traffic marking (see 406.6)	
	Truncated Domes damaged	
	Detectable Warning not full width of curb ramp	
Lower landing width < 36"		