ADA Title II Transition Plan

City of Roseburg, Oregon
PUBLIC RIGHT-OF-WAY FACILITIES

Self Evaluation and Transition Plan
March 26, 2018
City of Roseburg
ADA Transition Plan: Public Rights-of-Way

Self-Evaluation and Transition Plan

MARCH 26, 2018
This page intentionally left blank.
Acknowledgements

The ADA Transition Plan was developed with the help of many individuals including those listed below.

City of Roseburg

- Larry Rich, Mayor
- Tom Ryan, Council President
- Alison Eggers, Councilor
- Linda Fisher-Fowler, Councilor
- Andrea Zielinski, Councilor
- Brian Prawitz, Councilor
- John McDonald, Councilor
- Steve Kaser, Councilor
- Ashley Hicks, Councilor
- C. Lance Colley, City Manager
- John VanWinkle, Human Resources Director / ADA Coordinator
- Nikki Messenger, Public Works Director
- Jim Maciariello, Engineering Manager
- Mark Rodgers, Public Works Engineer
- Noriko Corrado, GIS Analyst

Consultants

- Matt Rogers, Principal-in-Charge
- Rawley Voorhies, Project Manager
- Kyle Bonnet, Project Engineer/GIS Lead
This page intentionally left blank.
# Table of Contents

Acknowledgements .................................................................................................................. i

Executive Summary ............................................................................................................... 1

I. Introduction ......................................................................................................................... 4

  Purpose ................................................................................................................................. 4
  ADA Background .................................................................................................................. 4
  Accessibility .......................................................................................................................... 5

Self-Evaluation and Transition Plan Requirements .............................................................. 6

Facility Assessment and Evaluation Timeframe ...................................................................... 7

Undue Burden .......................................................................................................................... 7

Resources ................................................................................................................................. 8

II. Public Outreach and Input ................................................................................................. 9

III. ADA Coordinator, Notice & Grievance Procedure .......................................................... 10

  ADA Coordinator ................................................................................................................ 10
  Issue Notice of ADA Provisions .......................................................................................... 10
  ADA Grievance Procedure ................................................................................................... 11

IV. Self-Evaluation .................................................................................................................. 13

  Public Right-of-Way Facilities ............................................................................................. 13
  Facility Assessment Methodology & Locations .................................................................... 14
  Assessment Findings ............................................................................................................. 15

V. Transition Plans .................................................................................................................. 20

  Prioritization methodology for public rights-of-way ........................................................... 20
  Funding Mechanisms for Pedestrian Facility Improvements .............................................. 21
  Curb Ramp Prioritization and Phasing Schedule ................................................................. 22
  Pedestrian Signal Prioritization and Phasing Schedule ......................................................... 24
  Transit Bus Stop Prioritization and Phasing Schedule ........................................................ 26
  Standards, Specifications and Procedures .......................................................................... 28
  Next Steps ............................................................................................................................. 28

Table of Contents | iii
Appendices

Appendix A – Public ROW Facility Inventory Maps
Appendix B – Public ROW Standard Details
Appendix C – Public Outreach and Input Information
Appendix D – Notice of ADA Provisions & Grievance Form
Appendix E – Glossary of Terms and Definitions
Appendix F – Resources
Appendix G – Supporting Information
Appendix H – Facility Data Sheets
This page intentionally left blank.
Executive Summary

The Americans with Disabilities Act (ADA) was originally enacted on July 26, 1990 as Public Law 101-336 (42 U.S.C. Sec. 12101 et seq.), and became effective on January 26, 1992. The fundamental goal of the ADA is to ensure equal access to civic life by people with disabilities. Title II of the ADA requires state and local governments to make their programs, services and activities accessible to persons with disabilities through the establishment of physical access requirements for public facilities.

As a municipality with greater than 50 employees, the City of Roseburg has an existing Americans with Disabilities Act (ADA) Transition Plan that was completed in 1996. This 2018 Transition Plan is being prepared to supplement the 1996 Transition Plan and continue working towards fulfilling the ADA Title II requirements.

The 2018 Transition Plan will present the City of Roseburg’s plan for removing barriers and providing access to all individuals, including those with disabilities, for pedestrian facilities within the public right-of-way. Specifically, this report focuses on the evaluation of curb ramps, signalized intersections and transit bus stops.

The City’s ADA Transition Plan must include, per the requirements of the ADA, a clear identification of insufficient conditions of facilities, policies and procedures. The Transition plan shall include the following aspects:

- An assessment, or self-evaluation, to identify facilities that create barriers to accessibility
- Prioritization, guidance, budget estimates, timeline and progress tracking for the removal of accessibility barriers
- Designation of a responsible, qualified individual to serve as the City’s ADA Coordinator
- A grievance process such that members of the public can notify the City of accessibility deficiencies.

At the time of the facilities evaluations, the following standards were used to identify barriers within the City’s rights-of-way.

- ADA 2010 Standards
- 2010 Oregon Structural Specialty Code (OSSC) Chapter 11 Accessibility,
- 2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG)
- 2009 Manual on Uniform Traffic Control Devices for Streets and Highways (MUTCD)
The number of public rights-of-way facilities assessed are presented below:

<table>
<thead>
<tr>
<th>Facility Type</th>
<th>Facilities Assessed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Curb Ramps: System-wide</td>
<td>1,626</td>
</tr>
<tr>
<td>Curb Ramps: Arterials &amp; Collectors</td>
<td>906</td>
</tr>
<tr>
<td>Curb Ramps: Local Roadways</td>
<td>720</td>
</tr>
<tr>
<td>UTrans Bus Stops</td>
<td>16</td>
</tr>
<tr>
<td>Pedestrian Push Buttons *</td>
<td>115</td>
</tr>
</tbody>
</table>

* Results are shown per intersection corner (i.e. each reported ‘Pedestrian Push Button’ is actually comprised of 2 push buttons per corner).

The Self-Evaluation and Transition Plan chapters go into greater detail regarding the:

- Assessment of these facilities;
- Analysis for compliance with applicable ADA requirements;
- Prioritization methodology for improvements to non-compliant facilities;
- Anticipated cost for the removal of the identified barriers.

The anticipated cost in 2018 funds for the removal of the identified barriers within public rights-of-way is in excess of $9.5 million. Due to the magnitude of these costs, the City will use various funding mechanisms to phase the barrier removal over a duration of up to 30 years. The City will focus on short-term priority facilities within the upcoming 0-6 years, however, may take advantage of opportunities to replace mid-term or long-term priority facilities if they can be reasonably completed along with adjacent improvements as part of the City’s Capital Improvement Plan.

In addition to the removal of physical barriers, the City will make the following process changes to respond to community equal access needs and ensure future improvements within the public right-of-way are free of barriers. These process changes include the following:

- Develop design and inspection process and checklists for all pedestrian facilities within the public right-of-way (or adopt the checklists of a known qualified source)
- Incorporate pedestrian facility upgrades, and the prioritization of these facilities, when making decisions about the selection and scoping of Capital Improvements Projects.
- Update City standard drawings to reflect current accessibility requirements and incorporate industry-standard construction tolerances. Standard drawings to apply for all work within public right-of-way.
- Develop a process for tracking annual improvements to pedestrian facilities.
ADA Coordinator and Policies
Consistent with 28 CFR Section 35.107, a public entity that employs 50 or more persons is required to designate at least one employee to coordinate its efforts to comply with the Americans with Disabilities Act (ADA) and publish a grievance procedures providing for prompt and equitable resolution of complaints alleging any action that would be prohibited by the ADA.

Accordingly, the City of Roseburg has established a formal complaint procedure consistent with the requirements listed above designated an ADA Coordinator whose responsibilities include the investigation of any complaints shared with the City alleging its noncompliance with the ADA. The Coordinator also is responsible for coordinating the efforts of the City to comply with all other applicable State and Federal physical and program accessibility requirements.

The designated ADA Coordinator for the City of Roseburg, along with contact information, is as follows:

<table>
<thead>
<tr>
<th>City of Roseburg ADA Coordinator: John VanWinkle</th>
</tr>
</thead>
<tbody>
<tr>
<td>Via phone: 541-492-6866</td>
</tr>
<tr>
<td>Via email: <a href="mailto:ivanwinkle@cityofroseburg.org">ivanwinkle@cityofroseburg.org</a></td>
</tr>
<tr>
<td>Via mail: City of Roseburg, Office of Administration</td>
</tr>
<tr>
<td>Attn: ADA Coordinator</td>
</tr>
<tr>
<td>900 SE Douglas Ave. Roseburg, OR 97470</td>
</tr>
</tbody>
</table>

Public Outreach
As part of the self-evaluation and transition plan requirement per Title II of the ADA, public entities are required to engage in meaningful public participation as part of the ADA Transition Plan drafting and adoption process.

The City of Roseburg is fulfilling this requirement by presenting the Transition Plan to the public for comment on February 1, 2018, followed by a public open house on February 27, 2018.

Additionally, the Transition Plan will be presented to City Council for review and input prior to adoption of the Final Transition Plan.
I. Introduction

Purpose
This report was developed to fulfill the self-evaluation requirements for pedestrian facilities within the City public rights-of-way (land owned by the City for public roadways).

This report does not address buildings or park facilities owned by the City of Roseburg. This report also does not address existing practices regarding program accessibility or employment practices. The ADA Self Evaluation and Transition Plan completed in March 1996 address these items satisfactorily.

While non-disabled members of the public can easily access pedestrian facilities and city programs, activities and services, disabled members of the public may face impediments that are not readily apparent to others. About 18 percent of Americans are disabled and they are guaranteed equal access to their local government.\(^1\)

This Transition Plan will provide the following:

- Identify areas where access to pedestrian facilities within the City public rights-of-way is inadequate due to existing barriers;
- Prioritize removal of these barriers;
- Establish a timeline for the removal of the identified public rights-of-way barriers;
- Ensure a policy and process is in place for responding to citizen concerns regarding barriers to accessing pedestrian facilities within the public rights-of-way;
- Appoint an ADA Coordinator to implement the above-mentioned policy and process.

ADA Background
The Americans with Disabilities Act (ADA) is a federal civil rights law that prohibits discrimination against individuals with disabilities.

The Americans with Disabilities Act (ADA) was originally enacted on July 26, 1990 as Public Law 101-336 (42 U.S.C. Sec. 12101 et seq.), and became effective on January 26, 1992. The Act was updated in 2010. The fundamental goal of the ADA is to ensure equal access to civic life by people with disabilities.

The definition of a disability is, by law, “a physical or mental impairment that substantially limits one or more major life activities, a record of such impairment or being regarded as having such an impairment.”\(^2\)

The development of a Transition Plan is a requirement of the federal regulations implementing the Rehabilitation Act of 1973, which requires that all organizations receiving federal funds make their programs available without discrimination toward people with disabilities. The Act,

---

\(^{1}\) ADA Update: A Primer for State and Local Governments, U.S. Department of Justice
\(^{2}\) American With Disabilities Act of 1990, As Amended, United States Code
which has become known as the "civil rights act" of persons with disabilities, states that:

_No otherwise qualified handicapped individual in the United States shall, solely by reason of handicap, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance._ (Section 504)

Subsequent to the enactment of the Rehabilitation Act, Congress passed the Americans with Disabilities Act on July 26, 1990. Title II of the ADA covers programs, activities, and services of public entities. The Department of Justice's Title II regulation adopts the general prohibitions of discrimination established under Section 504 and incorporates specific prohibitions of discrimination for the ADA. Specifically, the City may not, either directly or through contractual arrangements, do any of the following³:

- Deny persons with disabilities the opportunity to participate as members of advisory boards and commissions.
- Deny persons with disabilities the opportunity to participate in services, programs, or activities that are not separate or different from those offered others, even if the City offers permissibly separate or different activities.
- In determining the location of facilities, make selections that have the effect of excluding or discriminating against persons with disabilities.

**Accessibility**

Under Title II, the City of Roseburg is responsible for two forms of accessibility: physical accessibility and program accessibility.

**PHYSICAL ACCESSIBILITY**

This type of accessibility ensures that disabled individuals can travel to where they are going without barriers. This includes the curb ramps, transit bus stops, signalized intersection and other pedestrian facilities evaluated herein, as well as accessibility to buildings and parks.

While the goal is to remove all access barriers, the ADA does not require that all existing facilities be accessible. Rather, when viewed as a whole, disabled individuals must have physical access to the government’s facilities. Pedestrian facilities in the public right-of-way are considered a program of the local government under the ADA as they are part of a path of travel between activities and programs, public offices, parks, medical facilities, etc.

**PROGRAM ACCESSIBILITY**

The ADA requires that disabled citizens have equal access to programs, services, activities and information provided by the City. Examples of this form of accessibility are making modifications to a recreational program to enable the participation of a disabled individual or providing a sign language interpreter for a meeting at the request of a deaf citizen.

Government entities are required by the ADA to operate each of their services, programs, and activities in a way that they are accessible and usable by individuals with disabilities. However, the ADA does not require implementations that would result in undue financial and

³ Department of Justice, Title II Regulations Subpart B § 35.130
administrative burdens nor does it require changes that would fundamentally alter the nature of a service, program, or activity. One of the first steps to ensure program accessibility is to perform a self-evaluation. The self-evaluation process includes all City departments and how they interact with individuals with disabilities, as well as their policies and procedures in areas that intersect with areas covered under the law. Additionally, training practices must be reviewed during the self-evaluation process.

**Self-Evaluation and Transition Plan Requirements**

An ADA Self Evaluation and Transition Plan is a document prepared to identify existing programmatic and structural barriers that impede access to programs by people with disabilities. The Transition Plan shall also describe any physical changes required to make programs accessible.

The specific requirements of the Self Evaluation and Transition Plan must be consistent with the Title II requirements listed below:

*Title II of the ADA [298 CFR Section 35.150(d)]*

Title II requires that a public entity of 50 or more employees complete a “self-evaluation” by which the entity must develop a grievance procedure, designate an individual to oversee Title II compliance, develop a transition plan if removal of barriers is necessary to achieve compliance, and to retain the self-evaluation for three years. The transition plan should contain, at a minimum, the basic components listed below:

1. List of physical barriers in the R/W that limit accessibility of persons with disabilities;
2. Description of methods to be utilized to remove the barriers;
3. Schedule for taking the necessary steps to achieve compliance (requirement for curb ramps specifically); and
4. Name of official responsible for transition plan implementation.

An opportunity for public comment on the transition plan shall be made available to interested persons, including those with disabilities or organizations representing individuals with disabilities. A copy of the transition plan shall be made available for public inspection.

The Department of Justice published revised regulations for Title II of the ADA in 2010. These 2010 regulations adopted the revised, enforceable accessibility design standards called the 2010 ADA Standards for Accessible Design (2010 Standards) and permitted the 1991 Standards to be used until March 14, 2012.

The City of Roseburg has an existing Americans with Disabilities Act (ADA) Transition Plan that was completed in 1996. The previously completed transition plan was established in accordance with ADA requirements to ensure that City programs, services and activities are accessible to person with disabilities. The transition plan provided general guidance regarding physical barriers to access related to public facilities; such as buildings, curb ramps and parks. The 1996 Transition Plan also provided an in-depth assessment of the City’s building facilities at that time. This Transition Plan is a continuation of the City’s previous efforts in order to demonstrate the City’s commitment to providing barrier-free access to all individuals and ensure compliance with current ADA requirements.

Based on available funding, the City intends to update the ADA Transition Plan in multiple phases. The previously prepared ADA Self Evaluation and Transition Plan focused on policies
and procedures for compliance with the ADA, along with a comprehensive facility assessment for buildings.

This Transition Plan will focus on the Self Evaluation and Transition Plan for physical barriers within the public rights-of-way of the Roseburg city limits. With the exception of sidewalks, the facilities evaluated as part of this report make up the pedestrian access routes as defined per R105.5 of the July 2011 Proposed Guidelines for Pedestrian Facilities in the Public Right-of-Way (commonly referred to as 2011 PROWAG). This evaluation includes the following facilities:

- Curb ramps
- Push buttons at signalized intersections
- Transit bus stops
- At-grade crossings at designated crosswalks
- Pedestrian refuge islands
- Driveways with radius curb returns

Facility Assessment and Evaluation Timeframe

The survey process for the public rights-of-way facilities contained herein was conducted between October 2016 and December 2016, with follow-up assessments for a number of curb ramps on local roadways in August 2017.

At the time of the facilities evaluations, the ADA 2010 Standards, 2010 Oregon Structural Specialty Code (OSSC) Chapter 11 Accessibility, 2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG) and the 2009 Manual on Uniform Traffic Control Devices for Streets and Highways (MUTCD) were used to identify barriers within the City’s rights-of-way.

It shall be noted that the date of the facility assessments shall serve as the baseline for the state of the public rights-of-way facilities discussed in this report. The City has been making, and continues to make, ongoing improvements to eliminate barriers. It is likely that some physical attributes listed in the Facility Data Sheets (see Appendix H) may be in the process of being upgraded or be fully complete prior to the adoption of this Transition Plan.

Undue Burden

There are limits to a public entity's program access obligations. Entities are not required to take any action that would result in undue financial and administrative burdens. The decision that an action would result in an undue burden must be made by a high level official, no lower than a Department head, having budgetary authority and responsibility for making spending decisions, after considering all resources available for use in the funding and operation of the service, program, or activity, and must be accompanied by a written statement of the reasons for reaching that conclusion. If an action would result in an undue burden, a public entity must take any other action that would not result in an undue burden but would nevertheless ensure that individuals with disabilities receive the benefits or services provided by the public entity.4

---
4 ADA Update: A Primer for State and Local Governments, U.S. Department of Justice
Resources
The City of Roseburg may not, through operation and maintenance of inaccessible facilities, deny the benefits of its services, activities, and programs to individuals with disabilities. While this does not require that all of the City’s existing facilities be made accessible, the “program accessibility” standard envisions the City’s services, activities, and programs as an integrated and accessible whole.

Through this ADA Transition Plan and the resources identified in Appendix F, a comprehensive collection of information is available to all employees and representatives of the City. These resources are intended to provide starting points for the creation and maintenance of successful program accessibility standards and guidelines. As with any collection of resources, the City should anticipate adding to and revising these guidelines when necessary and when new resources become known.
II. Public Outreach and Input

As part of the self-evaluation and transition plan requirement per Title II of the ADA, public entities are required to engage in meaningful public participation as part of the ADA Transition Plan drafting and adoption process. More specifically, public entities must accept comments from the public on the Transition Plan and are strongly encouraged to consult with individuals with disabilities and organizations that represent these individuals to assist in the transition plan process.

The City of Roseburg is fulfilling this requirement by presenting the Transition Plan to the public for comment on February 1, 2018, followed by a public open house on February 27, 2018.

Additionally, the Transition Plan will be presented to City Council for review and input prior to adoption of the Final Transition Plan.

All notices of Transition Plan advertisement, public open house meeting minutes, City Council meeting minutes and public open house presentation materials will be located within Appendix C – Public Outreach and Input Information.
III. ADA Coordinator, Notice & Grievance Procedure

The City of Roseburg must designate an ADA Coordinator, establish a grievance procedure/process and post ADA policies.

ADA Coordinator

Consistent with 28 CFR Section 35.107, a public entity that employs 50 or more persons is required to designate at least one employee to coordinate its efforts to comply with the Americans with Disabilities Act (ADA). Accordingly, the City of Roseburg has designated an ADA Coordinator whose responsibilities include the investigation of any complaints shared with the City alleging its noncompliance with the ADA. The Coordinator also is responsible for coordinating the efforts of the City to comply with all other applicable State and Federal physical and program accessibility requirements.

The designated ADA Coordinator for the City of Roseburg, along with contact information, is as follows:

<table>
<thead>
<tr>
<th>City of Roseburg ADA Coordinator:</th>
<th>John VanWinkle</th>
</tr>
</thead>
<tbody>
<tr>
<td>Via phone:</td>
<td>541-492-6866</td>
</tr>
<tr>
<td>Via email:</td>
<td><a href="mailto:jvanwinkle@cityofroseburg.org">jvanwinkle@cityofroseburg.org</a></td>
</tr>
<tr>
<td>Via mail:</td>
<td>City of Roseburg, Office of Administration</td>
</tr>
<tr>
<td></td>
<td>Attn: ADA Coordinator</td>
</tr>
<tr>
<td></td>
<td>900 SE Douglas Ave.</td>
</tr>
<tr>
<td></td>
<td>Roseburg, OR 97470</td>
</tr>
</tbody>
</table>

Issue Notice of ADA Provisions

The City of Roseburg must provide public notice about the rights of the public under the ADA and the responsibility of the City under the ADA. Providing notice is not a one-time requirement, but a continuing responsibility. The audience of those who may have an interest in accessibility on agency facilities might include a large number of individual citizens that would be not be readily identifiable. Groups that are likely to include the target audience include public transit users and advocacy groups.

The City has the responsibility to determine the most effective way to provide notice. Various options the City may use include the City website, posting the notice at all City facilities, including the notice with job applications, radio, local newspapers, television, City utility mailings or City event mailings. The information must be presented in formats that are accessible to all users, this may include audio recordings, large print font, braille, CCTV and/or use of a qualified sign language interpreter.
The notice is required to include relevant information regarding Title II of the ADA\(^5\), the regulations that apply ADA to States and local governments, and how it applies to the programs, services, and activities of the City.

The notice in Appendix D is based on the Department of Justice model. A one-page document in a standard font, it includes brief statements about employment, effective communication, making reasonable modifications to policies and programs, not placing surcharges on modifications or auxiliary aids and services, and filing complaints.

**ADA Grievance Procedure**

As required by 28 CFR Section 35.107(b), “a public entity that employs 50 or more persons shall adopt and publish grievance procedures providing for prompt and equitable resolution of complaints alleging any action that would be prohibited” by the ADA and the cited part.

The City of Roseburg has established a formal complaint procedure consistent with the requirements listed above. This process is described within this section, and is subject to revision as needed.

Complaints or grievances must be submitted to the City of Roseburg in writing. Anonymous complaints or grievances will not be accepted. The complaint must contain specific information about the alleged violation or discrimination including, but not limited to, the following:

- Complainant Name
- Complainant Address
- Complainant Phone Number
- Location of Cause of Complaint
- Date of Complaint
- Complete Description of the Complaint
- Whether or not the Complaint has been filed with the Department of Justice or other Federal or State agencies

The City endeavors to keep complaints or grievances as confidential as possible, unless required to be released by State or Federal law, or ordered released by a court of competent jurisdiction.

At the discretion of the ADA Coordinator, alternate methods (such as by telephone, email, personal letter, tape recording or personal interview) of filing complaints or grievances may be allowed. Note that regardless of the means of filing, all complaints or grievances must include all of the information required in the City’s ADA complaint form (see Appendix D).

Complaints or grievances should be submitted as soon as possible from the date of the complaint, but no later than 60 calendar days after the date of the alleged violation or discriminatory act. All complaints or grievances must be submitted by the complainant or his/her

\(^5\) https://www.ada.gov/ada_title_II.htm
designee to the designated ADA Coordinator.

The ADA Coordinator will forward the complaint within seven (7) calendar days to the appropriate department for investigation and will formally acknowledge receipt of the complaint to the complainant thereafter.

The department assigned will contact the complainant to discuss the complaint or grievance within 30 calendar days after receipt of the complaint or grievance and give the complainant the opportunity to submit evidence relevant to the complaint. Within 30 calendar days of this contact, the assigned department will coordinate with the ADA Coordinator to respond in writing and/or in an alternative format accessible to the complainant if requested. The response will explain the position of the City and offer options for substantive and reasonable resolution of the complaint or grievance.

If the response by the assigned Department does not satisfactorily resolve the issue, the decision may be appealed to the City Manager within 30 calendar days following receipt of the response.

Within 30 calendar days after receipt of an appeal, the City Manager or designee will contact the complainant to discuss the complaint or grievance and possible resolutions. Within 30 calendar days of this contact, the City Manager or designee will respond in writing and, where appropriate, in a reasonable format accessible to the complainant, with a final resolution of the complaint or grievance.

Every reasonable attempt will be made by the City of Roseburg to remedy the disability complaints or grievances in a timely manner subject to staff and budget constraints. Complainant may at any time file a complaint with the Department of Justice or other appropriate State or Federal agency. The City will notify the complainant of this right and will provide the complainant with the appropriate addresses and phone numbers. Use of the City’s grievance procedure is not a prerequisite to pursuit of other remedies.

If any ADA or grievance is under the jurisdiction of another public entity, the complainant will be notified that the City of Roseburg lacks jurisdiction.

The ADA Coordinator shall maintain all records to the complaint filed.
IV. Self-Evaluation

Title II of the ADA requires that a public entity of 50 or more employees complete a self-evaluation. More specifically, the first component of this self-evaluation is to list the physical barriers within the right-of-way that limit accessibility of persons with disabilities. This chapter will detail the types of public right-of-way facilities present within the limits of the City of Roseburg, responsibilities for constructing and/or maintaining these facilities, facility assessment methodology and the findings of these assessments.

Based on available funding, the City intends to update the ADA Transition Plan in multiple phases. The ADA Self Evaluation and Transition Plan prepared by the City in 1996 focused on policies and procedures for compliance with the ADA, along with a comprehensive facility assessment for buildings.

This Transition Plan will focus on the Self Evaluation and Transition Plan for physical barriers within the public rights-of-way of the Roseburg city limits. More specifically, this evaluation includes the following facilities:

- Curb ramps
- Push buttons at signalized intersections
- Transit bus stops
- At-grade intersections with marked crossings
- Pedestrian refuge islands
- Driveways with radius curb returns

Public Right-of-Way Facilities

The table below identifies the various types of public access facilities found within City right-of-way and provides a brief description of the City’s obligations for constructing and/or maintaining these facilities.

**TABLE 4-1: Public Right-of-Way Facility Responsibilities**

<table>
<thead>
<tr>
<th>Facility Type</th>
<th>Evaluated</th>
<th>Responsible Party</th>
</tr>
</thead>
<tbody>
<tr>
<td>Curb Ramps, At-grade Intersections,</td>
<td>Yes</td>
<td>Curb ramp and median facilities within City public right-of-way are the maintenance responsibility of the City.</td>
</tr>
<tr>
<td>Pedestrian Islands</td>
<td></td>
<td>Note that within the City of Roseburg limits, ODOT owns and maintains the right-of-way for Interstate 5 and Highway 138. Curb ramps within this right-of-way, including the right-of-way for on-ramps and off-ramps, were excluded from evaluation.</td>
</tr>
<tr>
<td>Drop-style Driveways</td>
<td>No</td>
<td>Drop-style driveways are typically built by private landowners, but may be built by the City. This style of driveway may or may not include a ramp portion of sidewalk adjacent to the throat of the driveway. Per local ordinance, driveways are considered the maintenance and liability responsibility of the adjoining property owner.</td>
</tr>
</tbody>
</table>
### Facility Assessment Methodology & Locations

In 2016, the City hired a consultant to complete the self-evaluation and comprehensive field assessment of the pedestrian access facilities listed above.

The intent of the field assessment was to catalog the facility location, physical presence (or lack thereof), condition and facility accessibility qualities relative to 2011 PROWAG and 2009 MUTCD standards. Intersection locations that provided sidewalks for access and no curb ramp were also noted as barriers.

The evaluations were completed by consultant staff equipped with appropriate personal protective equipment (PPE), digital levels (2-foot and 1-foot), measuring tapes and GIS-equipped tablet computers. The tablet computers contained a GIS-based platform that included a mapping feature and a specific set of fillable evaluation criteria for each type of facility.

The locations of the various facilities assessed throughout the City can be seen in Appendix A: Public Right-of-Way Facility Inventory Maps.

### CURB RAMPS

The field assessment for curb ramps was separated into 2 categories due to the volume of facilities: Facilities within arterial and collector roadway corridors and facilities within local roadway corridors.

<table>
<thead>
<tr>
<th>Facility</th>
<th>Status</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Radius-return Driveways</td>
<td>Yes</td>
<td>Although similar to drop-style driveways in terms of how these are viewed by ordinances, this style of driveway typically will include a curb ramp adjacent to the driveway throat. Due to this, the City elected to include these facilities in the evaluation.</td>
</tr>
<tr>
<td>Sidewalks</td>
<td>No</td>
<td>As with driveways, sidewalks are considered the maintenance and liability responsibility of the adjoining property owner. The City does have a sidewalk rehabilitation program that is available to residential property owners. If approved by the Public Works Department, property owners need only pay for the materials to replace/repair sidewalk and the City pays for labor.</td>
</tr>
<tr>
<td>Traffic Signals</td>
<td>Yes</td>
<td>The City assumes responsibility for insuring the pedestrian signal facilities are accessible. The City is not responsible for maintaining accessible pedestrian signal facilities within Oregon DOT rights-of-way.</td>
</tr>
<tr>
<td>Transit Bus Stops</td>
<td>Yes</td>
<td>Umpqua Transit (UTrans) operates fixed route service within the general Roseburg vicinity. Through an intergovernmental agreement, the City assumes responsibility for maintaining adequate landing zones at the signed bus stop locations. The assessment of transit bus stops locations is limited to public rights-of-way within City limits.</td>
</tr>
<tr>
<td>Railroad Crossings</td>
<td>No</td>
<td>There are 5 instances with at-grade crossing between sidewalk and railroad grade within the City right-of-way. As the City of Roseburg does not have jurisdiction to improve these crossing per federal regulations, these facilities are excluded from assessment.</td>
</tr>
</tbody>
</table>
Due to the prioritization criteria per Title II regulations that are discussed further in Chapter 5, all facilities within the arterial and collector roadway corridors received full assessment of facility qualitative features, dimensions and slope information. Depending on curb ramp type, the full assessment typically required roughly 12-20 data inputs.

Facilities within the local roadway corridors were documented for location and received an enhanced visual assessment. This assessment consisted of recording the presence of a curb ramp, photo documentation of ramps that existed and recording of ramps that contained barriers due to obstructions, damaged surfacing or lack of truncated dome detectable warning systems. If all of these criteria passed, the field technicians performed a visual assessment of key geometry/slope indicators to determine if the ramp warranted a full assessment at a later date.

Note that the curb ramp facility category includes pedestrian refuge medians and at-grade crossing locations at intersections.

**SIGNALIZED INTERSECTIONS**

The field assessment for signalized intersections includes a number of different visual and measured criteria as defined by PROWAG and MUTCD. Due to the complexity of these facilities, the Oregon Dept. of Transportation Push Button Inspection Form was utilized. This form included assessment of the following:

- **Visual** – type of button, indicator, arrow surface, signal head. Audible pedestrian signal present.
- **Measured** – reach range, button height, clear space dimensions and slopes

**TRANSIT BUS STOPS**

The field assessment for transit bus stops was limited to the area immediately surrounding the bus stop signage, or extending to the bus stop shelter if this feature exists. The accessible route must be provided from the bus stop shelter, if present, to the passenger loading zone.

The following information was gathered regarding transit bus stops: deteriorated or damaged sidewalks within the accessible route/passenger loading zone, non-compliant loading zone dimensions (5’ wide by 8’ long) and loading zone/accessible route sidewalk cross-slopes in excess of the 2% maximum allowable. The running slope (parallel to roadway centerline) shall be equal to or less than the slope of the adjacent roadway.

**Assessment Findings**

Once data collection was complete, the data was exported into various formats for analysis. This included spreadsheets and data sheets that combine the physical field measurements, facility photos and visual observation information collected with a number of location-specific data. The additional data includes a unique facility identifier, address information and vicinity maps.

The Field Data Sheets can be found in Appendix H (available under separate cover by request to the ADA Coordinator).
The facility field data was then analyzed against a number of criteria to determine if the facilities are compliant with the appropriate accessibility requirements and/or to better identify the specific barriers to program access at each facility location.

The results of the self-evaluation efforts are presented below in Figure 4-1.

**Figure 4-1: Self-Evaluation Results Public Rights-of-Way Facilities**

<table>
<thead>
<tr>
<th>Facility Type</th>
<th>Facilities Assessed</th>
<th>Number of Compliant Facilities*</th>
<th>Percentage of Compliant Facilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Curb Ramps: System-wide</td>
<td>1,626</td>
<td>72</td>
<td>4.4%</td>
</tr>
<tr>
<td>Curb Ramps: Arterials &amp; Collectors</td>
<td>906</td>
<td>63</td>
<td>6.9%</td>
</tr>
<tr>
<td>Curb Ramps: Local Roadways</td>
<td>720</td>
<td>9</td>
<td>1.3%</td>
</tr>
<tr>
<td>UTrans Bus Stops</td>
<td>16</td>
<td>4</td>
<td>25%</td>
</tr>
<tr>
<td>Pedestrian Push Buttons**</td>
<td>115</td>
<td>4</td>
<td>3.5%</td>
</tr>
</tbody>
</table>

* Per 2011 PROWAG and 2009 MUTCD standards.
** Results are shown per intersection corner (i.e. each reported ‘Pedestrian Push Button’ is actually comprised of 2 push buttons per corner).

The results above are not atypical to the experiences of other agencies throughout the region. While many of these facilities surveyed appear functional and are being used on a routine basis by citizens, there are many older facilities that need attention to meet the current requirements of the ADA.

The Transition Plan chapter goes into greater detail regarding the prioritization methodology. Below is a further breakdown of the findings of the assessments.

**CURB RAMPS**

A total of 1,626 curb ramp and non-curb ramp locations were field-assessed and inventoried. The curb ramp facilities were then evaluated against a number of compliance criteria, such as those listed below:

a) Damaged, Deteriorated or Unsafe Surfacing - facilities containing tripping or slipping hazards due to construction with rough materials (cobble, brick, etc.), are excessively deteriorated and or contain cracking surfacing.
b) Ramp Access Not Present - A sidewalk exists, but a curb ramp is not present at the intersection or end of sidewalk

c) Truncated Dome Detectable Warning Non-Existent or Incorrectly Installed – Truncated domes must provide textured contrast to meet ADA requirements. Stenciled and/or stamped concrete surfacing is not considered compliant.

d) Ramp Running Slope > 8.33% in direction of travel

e) Turning Space/Landing less than 48” x 48”

f) Turning Space > 2.0% slope in any direction

g) Ramp Cross-Slope > 2%

h) Gutter/Street Counter Slope > 5%,

i) Grade Break Between Ramp and Gutter/Street Cross-Slope > 13%

j) Portion of Curb Ramp Outside of Marked Crosswalk

k) Ramp Width < 48”

l) Flared Ramp Side Slope > 10%

m) Ramp Lip Height at Street Transition > ¼”

n) Portion of Catch Basin within limits of Ramp Width

Using the compliance criteria listed above, the assessed curb ramps were analyzed and further catalogued into the following ‘Physical Characteristics’ categories:

**Deteriorated or Damaged:** 49 facilities (3%)

**No Ramp at Pedestrian Access Point:** 254 facilities (16%)

**Non-Functional Due to Obstructions, <36” Clear Width:** 55 facilities (3%)
The facility is functionally not accessible due to an obstruction (hydrant, utility pole, etc.) restricting access or less than 36” clear width for access.

**No Detectable Warning:** 880 facilities (54%)
Many of these ramps may contain textured surfaces, however, the ramp lacks a truncated dome surface that meets current ADA requirements.

**Detectable Warning Present. Poor Slopes/Geometry:** 218 facilities (13%)
A curb ramp with a detectable warning is present, however, the facility contains one or more criteria that are more than 25% out of dimensional and/or slope compliance parameters.

**All Remaining Non-Compliant Ramps:** 98 facilities (6%)
These facilities provided truncated domes detectable warnings, ramp landings, turning zones and are in satisfactory condition overall, however, do not meet all ADA standards.

**Fully Compliant Ramps with No Deficiencies:** 72 facilities (5%)
These facilities satisfactorily met all analyzed ADA compliance criteria.
SIGNALIZED INTERSECTIONS

The main component that was assessed and analyzed at the signalized intersections was the pedestrian push button system, which includes the push button and the adjacent clear space that is required adjacent to the push button so that access to the physical button can be provided.

The push buttons within the City of Roseburg are generally configured such that 2 push buttons are mounted to a single pole; in most cases this pole is the traffic signal pole. If push button upgrades occur to a configuration with buttons mounted on a common pole, it is required that both push buttons be upgraded to meet current standards.

As a result, the number of push buttons facilities assumes 2 push buttons mounted on a single pole reflects 1 ‘Push Button Facility’.

A total of 115 Push Button Facilities were field-assessed and inventoried.

The push button facilities were then evaluated against a number of compliance criteria, such as those listed below:

a) Push button shall be adjacent to the curb ramp landing
b) Face of push button shall be parallel to the direction of the crosswalk to be used.
c) Push button missing from a protected pedestrian refuge island or median.
d) Push button shall be located less than 5 feet perpendicular measured from edge of crosswalk.
e) Push button shall be located between 1.5 feet and 6 feet from the edge of curb. Push button may be up to 10 feet away if physical limitations exist.
f) Push buttons shall be more than 10 feet from adjacent push buttons, unless technically infeasible due to constraints.
g) Push button height shall be between 15” and 48” above adjacent grade.
h) Accessible Pedestrian Signals (APS) controller unit present.
   i) Provide a clear space with minimum dimensions of 48” x 48”.

Using the compliance criteria listed above, the assessed push button facilities were analyzed and further catalogued into the following ‘Physical Characteristics’ categories:

**Accessible Pedestrian Signal Not Provided: 111 facilities (96%)**

**Fully Compliant, No Deficiencies: 4 facilities (4%)**

**TRANSIT BUS STOPS**
A total of 16 bus stop facilities were field-assessed and inventoried.

The bus stops were then evaluated against a number of compliance criteria, such as those listed below:

a) Damaged, Deteriorated or Unsafe Surfacing - facilities containing tripping or slipping hazards due to construction with rough materials (cobble, brick, etc.), are excessively deteriorated and or contain cracking surfacing.

b) Loading zone dimensions shall meet the minimum 5’ width and 8’ depth requirements.

c) Loading zone cross-slope shall be less than 2% within the loading zone and the route from the loading zone to pedestrian furniture (shelter, bench, simme seat), if provided.

Using the compliance criteria listed above, the assessed bus stop facilities were analyzed and further catalogued into the following ‘Physical Characteristics’ categories:

**Deteriorated or Damaged: 1 facility (6%)**

**Non-Compliant Loading Zone Dimensions: 5 facilities (31%)**

**Loading Zone cross-slope greater than 2%: 6 facilities (38%)**

**Fully Compliant, No Deficiencies: 4 facilities (25%)**
V. Transition Plans

As identified in Chapter 4: Self-Evaluation, there are many existing pedestrian facilities within the public right-of-way that do not meet current standards for barrier-free access.

As discussed throughout this document, Title II requires public entities of greater than 50 employees to complete a Self-Evaluation and Transition Plan. Two critical components of this process will be addressed in this Chapter:

1. Description of methods to be utilized to remove the barriers. This can be further described by the subcomponents identified below:
   a. Develop a prioritization methodology to remove barriers to access.
   b. Development and implementation of internal standards, specifications and procedures related to physical removal of barriers to access.

2. Schedule for taking the necessary steps to achieve compliance (requirement for curb ramps specifically). This component is also heavily dependent on the following subcomponents:
   a. Funding mechanisms for barrier removal.
   b. Scheduling of barrier removal based on available funding and prioritization methodology.

This chapter will provide a specific plan for the prioritization methodology, funding and scheduling considerations for the removal of barriers for pedestrian facilities within the public right-of-way.

Prioritization methodology for public rights-of-way

Due to limited resources and the anticipated timeline to complete the required barrier-removal improvements, it is necessary for the City to prioritize barrier removal projects to ensure that funds are directed towards areas with the greatest demand and provide the greatest benefit.

Title II criteria for prioritizing barriers within the public rights-of-way is as follows:

If a public entity has responsibility or authority over streets, roads, or walkways, its transition plan shall include a schedule for providing curb ramps or other sloped areas where pedestrian walks cross curbs, giving priority to walkways serving entities covered by the Act, including State and local government offices and facilities, transportation, places of public accommodation, and employers, followed by walkways serving other areas.\(^7\)

To satisfy these criteria, the City has included the following geographic prioritization categories for facilities within public right-of-way:

- Locations providing access to Government and Public Facilities. The facilities included

\(^7\) Department of Justice, Title II Regulations Subpart B § 35.150(d)(2)
within this category are defined by the ‘Public Reserve’ zoning designation.

- Locations providing access to transportation. This category is specifically limited to pedestrian facilities within the right-of-way limits of arterials, collectors and minor collector roadways.
- Locations providing access to Commercial Employers. The facilities included within this category include industrial, commercial and mixed-use zoning designations.
- Locations providing access to Other Areas.

(See Appendix G – Supporting Information for zoning classifications at the time of this report.)

**Funding Mechanisms for Pedestrian Facility Improvements**

The ability to achieve the pedestrian barrier removals identified within this Transition Plan will depend largely on funding for these improvements.

The City has various mechanisms for implementing pedestrian improvements within the public right-of-way, they are as follows:

**Land Use Permitting:** The land use process gives the City the opportunity to review development proposals submitted by private parties for permitting approval. The improvements associated with the developments must meet the requirements of applicable codes and ordinances, including those of providing barrier-free access per ADA guidelines within contiguous public rights-of-way.

**Franchise Utility Upgrades:** Franchise utilities are increasingly relocating facilities underground, whether for system resiliency or as a City-ordinance requirement. In situations where the franchise utility disturbs any portion of an existing curb ramp, the curb ramp must be replaced to current accessibility standards.

**Transportation Maintenance:** The City has a Pavement Management Plan that is utilized to maintain the safety and longevity of the City’s transportation system. This program is designed such that arterials and collectors receive some sort of maintenance upgrade, oftentimes a pavement grind and inlay, on a maximum 20-year cycle. Depending on the type maintenance activities performed, the requirement for ADA upgrades to be completed may be triggered.

**Transportation Construction:** This generally encompasses certain projects included within the City’s Capital Improvement Plan (CIP). Projects completed as part of the CIP may be funded by local, state or federal funds. The City can specifically allocate funds to the types of barriers identified in this Transition Plan via Urban Renewal, Transportation, Sidewalk/Streetlight/Traffic Signal Funds.

**Miscellaneous Building and/or Utility Construction:** During the construction of improvements abutting or within the public right-of-way, such as utility trenching or building construction, any existing pedestrian accessibility features that are disturbed must be reconstructed to current ADA standards. In the past, it was commonplace to see trench patches through curb ramps, however, this practice is no longer considered acceptable except in very rare cases.
Curb Ramp Prioritization and Phasing Schedule

PRIORITIZATION
The following page provides graphics that identify curb ramp prioritization scoring criteria and also highlight how the analyzed curb ramps fit within the scoring criteria.

The left columns provide criteria based on the physical characteristics of each ramp, with an associated priority score ranging from 0 to 50 (in white) alongside the various criteria. The top row is similar and provides criteria based on the geospatial characteristics of each ramp. These scores (also shown in white) range from 0 to 30 and are located directly beneath the geospatial criteria.

Table 5-1: Scoring Methodology for Curb Ramp Barrier Removal Prioritization, on the following page, identifies the scoring methodology for prioritizing curb ramp improvements. In general, a higher score translates to a curb ramp that is closer to being compliant and a lower score identifies ramps that have significant or multiple barriers to access.

Table 5-2: Facility Quantities for Curb Ramp Barrier Removal Prioritization, also on the following page, lists the total number of curb ramps that fall within each specific prioritization scenario. For example, there are 73 curb ramps that have ‘No Detectable Warning’ and are located within an area providing ‘Access to Government & Public Facilities’. Adding the scoring criteria (30 points for no detectable warning + 0 points for access to government & public facilities) for the adjacent criteria results in a new score of 30. This would be a short-term priority curb ramp as shown by the legend.

ANTICIPATED COSTS AND IMPROVEMENTS PHASING SCHEDULE
As shown in Table 5-2, the self-evaluation and subsequent analysis determined that there are 1,554 curb ramps that need to be improved or replaced to satisfy ADA requirements.

Many of the short-term priority improvements are along the City’s arterials and collectors, which typically necessitates shorter work hours, additional traffic control requirements and larger curb radius at intersections. As a result, it is anticipated that the costs for the design, right-of-way acquisition (if required) and construction of curb ramp improvements in these areas can be completed for roughly $7,500 per ramp.

Long-term priority improvements occurring on local roads typically benefit greatly from a smaller footprint and ease of access. It is anticipated that the design, property acquisition (if required) and construction for these curb ramp improvements, predominantly adjacent to local roadways, can be completed for roughly $3,500 per ramp.

The phasing schedule for the required curb ramp upgrades are shown in Table 5-3. The plan shown represents a 30-year outlay for curb ramp barrier removal, which translates to approximately $289,450/year in curb ramp upgrade funding.

This outlay doesn’t take into account the potential for replacement of non-compliant curb ramps due to development and/or ADA upgrades triggered due to disturbance by utility or other miscellaneous projects. The City also reserves the right to modify the phasing schedule if necessary to address citizen needs, changes in City programs or to take advantage of funding opportunities.
### Table 5-1: Scoring Methodology for Curb Ramp Barrier Removal Prioritization

<table>
<thead>
<tr>
<th>CURB RAMPS</th>
<th>Geospatial Proximity Priority Description</th>
<th>Access to Government &amp; Public Facilities</th>
<th>Transportation</th>
<th>Commercial Employers</th>
<th>Other Areas</th>
</tr>
</thead>
<tbody>
<tr>
<td>Physical Characteristics Priority Description</td>
<td>Priority Score</td>
<td>0</td>
<td>10</td>
<td>20</td>
<td>30</td>
</tr>
<tr>
<td>Deteriorated or Damaged</td>
<td>0</td>
<td>0</td>
<td>10</td>
<td>20</td>
<td>30</td>
</tr>
<tr>
<td>No Ramp at Pedestrian Access Point</td>
<td>10</td>
<td>10</td>
<td>20</td>
<td>30</td>
<td>40</td>
</tr>
<tr>
<td>Obstructions, &lt; 36&quot; Clear Width</td>
<td>20</td>
<td>20</td>
<td>30</td>
<td>40</td>
<td>50</td>
</tr>
<tr>
<td>No Detectable Warning</td>
<td>30</td>
<td>30</td>
<td>40</td>
<td>50</td>
<td>60</td>
</tr>
<tr>
<td>Detectable Warning, Poor Slopes/Geometry</td>
<td>40</td>
<td>40</td>
<td>50</td>
<td>60</td>
<td>70</td>
</tr>
<tr>
<td>All Remaining Ramps</td>
<td>50</td>
<td>50</td>
<td>60</td>
<td>70</td>
<td>80</td>
</tr>
<tr>
<td>Fully Compliant, No Deficiencies</td>
<td>-</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
</tr>
</tbody>
</table>

### Table 5-2: Facility Quantities for Curb Ramp Barrier Removal Prioritization

<table>
<thead>
<tr>
<th>CURB RAMPS</th>
<th>Geospatial Proximity Priority Description</th>
<th>Access to Government &amp; Public Facilities</th>
<th>Transportation</th>
<th>Commercial Employers</th>
<th>Other Areas</th>
</tr>
</thead>
<tbody>
<tr>
<td>Physical Characteristics Priority Description</td>
<td>Priority Score</td>
<td>0</td>
<td>10</td>
<td>20</td>
<td>30</td>
</tr>
<tr>
<td>Deteriorated or Damaged</td>
<td>0</td>
<td>0</td>
<td>40</td>
<td>0</td>
<td>9</td>
</tr>
<tr>
<td>No Ramp at Pedestrian Access Point</td>
<td>10</td>
<td>0</td>
<td>30</td>
<td>0</td>
<td>224</td>
</tr>
<tr>
<td>Obstructions, &lt; 36&quot; Clear Width</td>
<td>20</td>
<td>4</td>
<td>34</td>
<td>0</td>
<td>17</td>
</tr>
<tr>
<td>No Detectable Warning</td>
<td>30</td>
<td>73</td>
<td>474</td>
<td>11</td>
<td>322</td>
</tr>
<tr>
<td>Detectable Warning, Poor Slopes/Geometry</td>
<td>40</td>
<td>12</td>
<td>192</td>
<td>14</td>
<td>0</td>
</tr>
<tr>
<td>All Remaining Ramps</td>
<td>50</td>
<td>3</td>
<td>9</td>
<td>0</td>
<td>86</td>
</tr>
<tr>
<td>Fully Compliant, No Deficiencies</td>
<td>-</td>
<td>5</td>
<td>58</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>
Pedestrian Signal Prioritization and Phasing Schedule

PRIORITIZATION
The following page provides graphics that identify pedestrian signal (push button) prioritization scoring criteria and also highlight how the analyzed push buttons fit within the scoring criteria.

Table 5-4: Scoring Methodology for Push Button Barrier Removal Prioritization, on the following page, identifies the scoring methodology for prioritizing push button improvements. A lower score identifies push buttons that have significant or multiple barriers to access.

Table 5-5: Facility Quantities for Push Button Barrier Removal Prioritization, also on the following page, lists the total number of push buttons that fall within each specific prioritization scenario.

ANTICIPATED COSTS AND IMPROVEMENTS PHASING SCHEDULE
As shown in Table 5-5, the self-evaluation and subsequent analysis determined that there are 111 push button systems (intersection corners) that need to be improved or replaced to satisfy ADA requirements.

An appropriate construction cost for replacement of the push buttons per corner is approximately $7,500, however, the push buttons are not typically replaced one corner at a time. It would be expected that the push buttons would be replaced on all 4 corners of an intersection for an approximate cost of $30,000 for the intersection.

The intersection replacement cost estimate assumes replacement with 8 APS push buttons, 4 pedestrian posts, 8 pedestrian countdown signals, 4 of the replaced APS push buttons/signals can be mounted on the existing signal pole and conduit/wiring upgrades to support the pedestrian post installations.
The phasing schedule for the required push button system upgrades are shown in Table 5-6. The plan shown represents a 10-year outlay for push button barrier removal, which translates to approximately $86,250/year in pedestrian signal upgrade funding.

The City also reserves the right to modify the phasing schedule if necessary to address citizen needs, changes in City programs or to take advantage of funding opportunities.

**Table 5-4: Scoring Methodology for Push Button Barrier Removal Prioritization**

<table>
<thead>
<tr>
<th>PUSH BUTTONS</th>
<th>Geospatial Proximity Priority Description</th>
<th>Access to Government &amp; Public Facilities</th>
<th>Transportation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Physical Characteristics Priority Description</td>
<td>Priority Score</td>
<td>0</td>
<td>50</td>
</tr>
<tr>
<td>Accessible Pedestrian Signal Not Provided</td>
<td>0</td>
<td>0</td>
<td>50</td>
</tr>
<tr>
<td>Fully Compliant, No Deficiencies</td>
<td>-</td>
<td>100</td>
<td>100</td>
</tr>
</tbody>
</table>

**Table 5-5: Facility Quantities for Push Button Barrier Removal Prioritization**

<table>
<thead>
<tr>
<th>PUSH BUTTONS</th>
<th>Geospatial Proximity Priority Description</th>
<th>Access to Government &amp; Public Facilities</th>
<th>Transportation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Physical Characteristics Priority Description</td>
<td>Priority Score</td>
<td>0</td>
<td>50</td>
</tr>
<tr>
<td>Accessible Pedestrian Signal Not Provided</td>
<td>0</td>
<td>18</td>
<td>93</td>
</tr>
<tr>
<td>Fully Compliant, No Deficiencies</td>
<td>-</td>
<td>0</td>
<td>4</td>
</tr>
</tbody>
</table>

**Table 5-6: Transition Plan Schedule – Pedestrian Signals**

<table>
<thead>
<tr>
<th>Priority Score</th>
<th>Schedule Year</th>
<th>Intersection Corners Improved</th>
<th>Percent of Total</th>
<th>Avg. Cost per Intersection Corner</th>
<th>Estimated Total Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Short-Term Priority</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>0</td>
<td>0-6</td>
<td>18</td>
<td>16.2%</td>
<td>$7,500</td>
<td>$135,000</td>
</tr>
<tr>
<td><strong>Mid-Term Priority</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>50</td>
<td>6-10</td>
<td>93</td>
<td>83.8%</td>
<td>$7,500</td>
<td>$697,500</td>
</tr>
<tr>
<td><strong>Total for All Projects</strong></td>
<td>111</td>
<td>100.0%</td>
<td>---</td>
<td>---</td>
<td>$832,500</td>
</tr>
</tbody>
</table>
Transit Bus Stop Prioritization and Phasing Schedule

PRIORITIZATION
The following page provides graphics that identify bus stop prioritization scoring criteria and also highlight how the analyzed bus stops fit within the scoring criteria.

Table 5-7: Scoring Methodology for Bus Stop Barrier Removal Prioritization, on the following page, identifies the scoring methodology for prioritizing bus stop improvements. A lower score identifies bus stop that have significant or multiple barriers to access.

Table 5-8: Facility Quantities for Bus Stop Barrier Removal Prioritization, also on the following page, lists the total number of bus stops that fall within each specific prioritization scenario.

ANTICIPATED COSTS AND IMPROVEMENTS PHASING SCHEDULE
As shown in Table 5-8, the self-evaluation and subsequent analysis determined that there are 12 bus stops that need to be improved or replaced to satisfy ADA requirements.

An appropriate construction cost for replacement of the bus stops is approximately $3,000 if completed by a contracting entity. The cost would likely be substantially less if completed by City maintenance crews as the primary driver of the cost is anticipated traffic control and the inefficiencies associated with a small project site. The estimate also assumes that some of the existing shelters may need to be removed to facilitate the replacement of the loading zone sidewalk panels and any transition panels adjacent to the replacement limits.

The phasing schedule for the required bus stop upgrades are shown in Table 5-9. The plan shown represents a 20-year outlay for bus stop barrier removal, which translates to approximately $1,800/year in bus stop upgrade funding.

The City also reserves the right to modify the phasing schedule if necessary to address citizen needs, changes in City programs or to take advantage of funding opportunities.
Table 5-7: Scoring Methodology for Bus Stop Barrier Removal Prioritization

<table>
<thead>
<tr>
<th>TRANSIT STOPS</th>
<th>Geospatial Proximity Priority Description</th>
<th>Access to Government &amp; Public Facilities</th>
<th>Transportation</th>
<th>Commercial Employers</th>
<th>Other Areas</th>
</tr>
</thead>
<tbody>
<tr>
<td>Physical Characteristics Priority Description</td>
<td>Priority Score</td>
<td>0</td>
<td>15</td>
<td>30</td>
<td>45</td>
</tr>
<tr>
<td>Deteriorated or Damaged</td>
<td>0</td>
<td>0</td>
<td>15</td>
<td>30</td>
<td>45</td>
</tr>
<tr>
<td>Non-Compliant Loading Zone Dimensions</td>
<td>25</td>
<td>25</td>
<td>40</td>
<td>55</td>
<td>70</td>
</tr>
<tr>
<td>Loading Zone cross-slope greater than 2%</td>
<td>50</td>
<td>50</td>
<td>65</td>
<td>80</td>
<td>95</td>
</tr>
<tr>
<td>Fully Compliant, No Deficiencies</td>
<td>-</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
</tr>
</tbody>
</table>

Table 5-8: Facility Quantities for Bus Stop Barrier Removal Prioritization

<table>
<thead>
<tr>
<th>TRANSIT STOPS</th>
<th>Geospatial Proximity Priority Description</th>
<th>Access to Government &amp; Public Facilities</th>
<th>Transportation</th>
<th>Commercial Employers</th>
<th>Other Areas</th>
</tr>
</thead>
<tbody>
<tr>
<td>Physical Characteristics Priority Description</td>
<td>Priority Score</td>
<td>0</td>
<td>15</td>
<td>30</td>
<td>45</td>
</tr>
<tr>
<td>Deteriorated or Damaged</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Non-Compliant Loading Zone Dimensions</td>
<td>25</td>
<td>1</td>
<td>4</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Loading Zone cross-slope greater than 2%</td>
<td>50</td>
<td>1</td>
<td>5</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Fully Compliant, No Deficiencies</td>
<td>-</td>
<td>2</td>
<td>2</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

Table 5-9: Transition Plan Schedule – Transit Bus Stops

<table>
<thead>
<tr>
<th>Priority Score</th>
<th>Schedule Year</th>
<th>Bus Stops Improved</th>
<th>Percent of Total</th>
<th>Avg. Cost per Bus Stop</th>
<th>Estimated Total Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Short-Term Priority</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>15-25</td>
<td>0-6</td>
<td>2</td>
<td>16.7%</td>
<td>$3,000</td>
<td>$6,000</td>
</tr>
<tr>
<td><strong>Mid-Term Priority</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>30-65</td>
<td>6-20</td>
<td>10</td>
<td>83.3%</td>
<td>$3,000</td>
<td>$30,000</td>
</tr>
<tr>
<td><strong>Total for All Projects</strong></td>
<td>12</td>
<td></td>
<td>100.0%</td>
<td>---</td>
<td>$36,000</td>
</tr>
</tbody>
</table>
Standards, Specifications and Procedures

Having consistent standards, specifications and procedures in place that ensure compliance with PROWAG standards is a high priority.

The City generally follows ODOT specifications and standards for Capital Improvement Projects. This is an appropriate approach as ODOT was recently subject to a Department of Justice settlement and is taking substantial strides to ensure that the agencies’ standards, specifications and procedures comply with ADA standards.

Training

There are many conflicting ADA ‘resources’ available online that may not comply with the recognized PROWAG, MUTCD and ADA standards. The City should provide training for their staff involved with the management, design, inspection and construction of facilities that must be ADA-compliant. Other agencies have found success in appointing certain individuals to work closely with the ADA Coordinator to become the in-house authorities for the design plan review and field inspection of pedestrian accessibility features.

Design and Inspection Checklists

Developing design and inspection checklists, or adopting those of other agencies such as ODOT, is suggested to ensure that all staff responsible for ADA compliance are provided with the necessary documentation tools to accurately assess facility compliance.

Exceptions Policy

It is possible that there may be new and/or altered pedestrian facilities within the public right-of-way that can’t be feasibly constructed in an ADA-compliant manner. While there are limited occasions in which PROWAG standards do allow for exceptions from design standards for curb ramps and pedestrian signals, all exceptions shall be sufficiently documented in a consistent manner and kept on file for record.

Next Steps

Once the 2018 Transition Plan is adopted, the City will have completed the self-evaluation of programmatic barriers to access, as well as the evaluation of City building facilities (as of 1996) and pedestrian public right-of-way facilities (curb ramps, signalized intersections, transit bus stops).
Appendices
Appendix A
Public ROW Facility Inventory Maps
CITY OF ROSEBURG
ADA TRANSITION PLAN

Curb Ramps - Arterials & Collector Facilities

LEGEND
- Unclassified_Ramp
- Parallel_Ramp
- Combination_Ramp
- Perpendicular_Ramp
LEGEND

- Curb_Ramp
CITY OF ROSEBURG
ADA TRANSITION PLAN

Signalized Intersections - Pedestrian Push Buttons

LEGEND

• Push_Button
CITY OF ROSEBURG
ADA TRANSITION PLAN

Transit Stops - Passenger Loading Zones

LEGEND
● Transit_Stop

0 0.3 0.6 1.2 Miles
Appendix B
Public ROW Standard Details
Pedestrian Intervals

**Walk Interval**
- Pedestrian Sign: STEADY
- Pedestrian Intervals: Walk Interval
- Minimum: 7 seconds

**Pedestrian Change Interval**
- Calculated Pedestrian Clearance Time (Refer to section 4E.06)
- Minimum: 3 seconds

**Buffer Interval**
- “Zero” point of countdown display
- Minimum: 3 seconds

Relationship to associated vehicular phase intervals:

1. **Yellow Change Interval = Buffer Interval**
   - STEADY
   - Flashing W/ COUNTDOWN*
   - STEADY
   - STEADY
   - GREEN (G)
   - YELLOW (Y)
   - RED (R)

2. **Yellow Change Interval + Red Clearance Interval = Buffer Interval**
   - GREEN (G)
   - YELLOW (Y)
   - RED (R)
   - RED (R)

3. **Part of Yellow Change Interval + Red Clearance Interval = Buffer Interval**
   - GREEN (G)
   - YELLOW (Y)
   - RED (R)
   - RED (R)

4. **Red Clearance Interval = Buffer Interval**
   - GREEN (G)
   - YELLOW (Y)
   - RED (R)
   - RED (R)

5. **Associated Green Interval extends beyond end of Buffer Interval**
   - GREEN (G)
   - YELLOW (Y)
   - RED (R)
   - RED (R)

* The countdown display is optional for Pedestrian Change Intervals of 7 seconds or less
** The Walk Interval may be reduced under some conditions (see Section 4E.06)
*** The buffer interval, which shall always be provided and displayed, may be used to help satisfy the calculated pedestrian clearance time, or may begin after the calculated pedestrian clearance time has ended

**LEGEND**
- **G** Green Interval
- **Y** Yellow Change Interval *(at least 3 seconds)*
- **R** Red Clearance Interval
- **Red** Red because conflicting traffic has been released
Pedestrian Signs and Plaques

R10-2
CROSS ONLY ON SIGNAL

R10-3
PUSH BUTTON FOR

R10-3a
PUSH BUTTON TO CROSS STREET WAIT FOR

R10-3b
START CROSSING Watch For Vehicles
DON'T START Finish Crossing If Started
DON'T CROSS
PUSH BUTTON TO CROSS

R10-3c
START CROSSING Watch For Vehicles
DON'T START Finish Crossing If Started
DON'T CROSS
PUSH BUTTON TO CROSS

R10-3d
START CROSSING Watch For Vehicles
DON'T START Finish Crossing If Started
DON'T CROSS
PUSH BUTTON TO CROSS

R10-3e
START CROSSING Watch For Vehicles
DON'T START Finish Crossing If Started
TIME REMAINING To Finish Crossing
DON'T CROSS
PUSH BUTTON TO CROSS

R10-3f
START CROSSING Watch For Vehicles
DON'T START Finish Crossing If Started
DON'T CROSS
PUSH BUTTON TO CROSS
Maple Drive

R10-3g
START CROSSING Watch For Vehicles
DON'T START Finish Crossing If Started
DON'T CROSS
PUSH BUTTON TO CROSS
Maple Drive

R10-3h
START CROSSING Watch For Vehicles
DON'T START Finish Crossing If Started
DON'T CROSS
PUSH BUTTON TO CROSS
Maple Drive

R10-3i
START CROSSING Watch For Vehicles
DON'T START Finish Crossing If Started
DON'T CROSS
PUSH BUTTON TO CROSS
Maple Drive
Typical Pushbutton Locations (1 of 2)

A. Parallel ramps with wide sidewalk

B. Parallel ramps with narrow sidewalk

C. Parallel ramps with narrow sidewalk & tight corner radius

D. Perpendicular ramps with crosswalks far apart

Legend

- Downward Slope
- Pedestrian Pushbutton
- Detectable Warning (per ADAAG)
- Landing Area (per ADAAG)

Notes:
1. This figure is not drawn to scale.
2. These drawings are intended to describe the typical locations for pedestrian pushbutton installations. They are not intended to be a guide for the design of curb cut ramps.
3. Figure 4E-3 shows the recommended area for pushbutton locations.
E. Perpendicular ramps with crosswalks close together

F. Perpendicular ramps with sidewalk set back from road with crosswalks far apart

G. Perpendicular ramps with sidewalk set back from road with crosswalks close together

H. Perpendicular ramps with sidewalk set back from road with continuous sidewalk between ramps

Legend
- Downward Slope
- Pedestrian Pushbutton
- Detectable Warning (per ADAAG)
- Landing Area (per ADAAG)

Notes:
1. This figure is not drawn to scale.
2. These drawings are intended to describe the typical locations for pedestrian pushbutton installations. They are not intended to be a guide for the design of curb cut ramps.
3. Figure 4E-3 shows the recommended area for pushbutton locations.
Appendix C
Public Outreach and Input Information
Good morning,

Following is a copy of a news release that was sent to the media today. The information is posted to our City website home page and will be added to our City Facebook page. Thank you.

**NEWS RELEASE**

*February 1, 2017*

The City of Roseburg has prepared a draft ADA Transition Plan to include accessible curb ramps, pedestrian signals and bus stops within the public rights-of-way. The ADA Transition Plan is a federally required document that prioritizes and guides local efforts to complete accessibility upgrades and charts a course for the City to achieve compliance with current Americans with Disability Act (ADA) standards.

The City of Roseburg invites public comments concerning the above-described components of the ADA Transition Plan and will invite comments through February 27, 2017.

An electronic copy is available on the City website at [www.cityofroseburg.org](http://www.cityofroseburg.org) on the home page under recent city news. Paper copies of the draft transition plan for public right-of-way facilities are also available for review at multiple locations: the City Manager’s Office (3rd Floor City Hall, 900 SE Douglas Ave.) and the Umpqua Valley Disability Network (736 Jackson St.).

A public open house to review the draft ADA Transition Plan will be held on **Tuesday, February 27, 2018 from 6:00 – 8:00 p.m.** at the Roseburg Public Safety Center Umpqua Room, 700 SE Douglas Avenue.

For more information please contact Mark Rodgers, PE at 541-492-6892

*Sincerely,*

**Koree Tate | Management Assistant | City Administration Office**

*City Manager/City Recorder/Human Resources*

City of Roseburg | 900 SE Douglas Avenue | Roseburg, OR 97470
City of Roseburg inviting public comment for Disabilities Act transition plan

by KPIC
Thursday, February 1st 2018

Roseburg City Hall, December 26, 2017. (SBG)
ROSEBURG, Ore. -- The City of Roseburg has prepared a draft ADA Transition Plan to include accessible curb ramps, pedestrian signals and bus stops within the public rights-of-way, city officials said.

The ADA Transition Plan is a federally required document that prioritizes and guides local efforts to complete accessibility upgrades and charts a course for the City to achieve compliance with current Americans with Disability Act (ADA) standards.
The City of Roseburg invites public comments concerning the above-described components of the ADA Transition Plan and will invite comments through February 27, 2018.

An electronic copy is available on the City website (http://www.cityofroseburg.org) on the home page under recent city news.

Paper copies of the draft transition plan for public right-of-way facilities are also available for review at multiple locations: the City Manager’s Office (3rd Floor City Hall, 900 SE Douglas Ave.) and the Umpqua Valley Disability Network (736 Jackson St.).

A public open house to review the draft ADA Transition Plan will be held on Tuesday, February 27, 2018 from 6-8 p.m. at the Roseburg Public Safety Center Umpqua Room, 700 SE Douglas Avenue.

For more information please contact Mark Rodgers, PE at 541-492-6892
Appendix D
Notice of ADA Provisions & Grievance Form
THIS PAGE INTENTIONALLY LEFT BLANK
Americans with Disabilities Act (ADA)
GRIEVANCE FORM

Today's Date: _____________________________  City: check here if filed ☐

Complainant's Name: ________________________________

Phone Number: ______________________________________

Address: ___________________________________________

City, State, Zip: ______________________________________

Email: _____________________________________________

Date of Alleged Violation: ______________________________

Description of Complaint: (Please include a detailed description of the complaint including location(s), persons(s) involved, witness contact information, etc. Use additional pages, if necessary and attach any other documents that may be important.)

Complainant Signature and Date

Return to: City of Roseburg ADA Coordinator
900 SE Douglas Ave | Roseburg, OR 97470
jvanwinkle@cityofroseburg.org
Americans with Disabilities Act (ADA)
GRIEVANCE FORM – FILED

Staff Use Only

Date Filed: ____________________________

Agency or Court: ____________________________

Contact Person: ____________________________

Phone Number: ____________________________

Address: ____________________________

City, State, Zip: ____________________________

Email: ____________________________

Date Received: ____________________________

Received By: ____________________________

Complaint File #: ____________________________

Comments:

Authorized Staff Signature and Date

Return to: City of Roseburg ADA Coordinator
900 SE Douglas Ave | Roseburg, OR 97470
jvanwinkle@cityofroseburg.org
NOTICE UNDER THE AMERICANS WITH DISABILITIES ACT

In accordance with the requirements of title II of the Americans with Disabilities Act of 1990 ("ADA"), the City of Roseburg will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

Employment: The City of Roseburg does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under title I of the ADA.

Effective Communication: The City of Roseburg will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in the City of Roseburg’s programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.

Modifications to Policies and Procedures: The City of Roseburg will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services, and activities. For example, individuals with service animals are welcomed in the City of Roseburg offices, even where pets are generally prohibited.

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of the City of Roseburg should contact the office of the City of Roseburg ADA Coordinator as soon as possible but no later than 48 hours before the scheduled event.

The ADA does not require the City of Roseburg to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden.

Complaints that a program, service, or activity of The City of Roseburg is not accessible to persons with disabilities should be directed the City of Roseburg ADA Coordinator.

The City of Roseburg will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy, such as retrieving items from locations that are open to the public but are not accessible to persons who use wheelchairs.
Appendix E
Glossary of Terms and Definitions
THIS PAGE INTENTIONALLY LEFT BLANK
Glossary of Terms and Definitions

**Access Aisle**
An accessible pedestrian space between elements, such as parking spaces, seating, and desks, which provide clearances appropriate for use of the elements.

**Accessible**
Describes a site, building, facility, or portion thereof that complies with these guidelines.

**Accessible Element**
An element specified by these guidelines (for example, telephone, controls, and the like).

**Accessible Route**
A continuous unobstructed path connecting all accessible elements and spaces of a building or facility. Interior accessible routes may include corridors, floors, ramps, elevators, lifts, and clear floor space at fixtures. Exterior accessible routes may include parking access aisles, curb ramps, crosswalks at vehicular ways, walks, ramps, and lifts.

**Accessible Pedestrian Signals (APS)**
A pedestrian pushbutton device that communicates information about pedestrian timing in a non-visual format such as audible tones, verbal messages, and/or vibrating surfaces.

**Accessible Space**
Space that complies with these guidelines.

**Adaptability**
The ability of certain building spaces and elements, such as kitchen counters, sinks, and grab bars, to be added or altered so as to accommodate the needs of individuals with or without disabilities or to accommodate the needs of persons with different types or degrees of disability.

**Addition**
An expansion, extension, or increase in the gross floor area of a building or facility.

**Administrative Authority**
A governmental agency that adopts or enforces regulations and guidelines for the design, construction, or alteration of buildings and facilities.

**Alteration**
A change to a building or facility that affects or could affect the usability of the building or facility or part thereof. Alterations include, but are not limited to, remodeling, renovation, rehabilitation, reconstruction, historic restoration, resurfacing of circulation paths or vehicular ways, changes or rearrangement of the structural parts or elements, and changes or rearrangement in the plan configuration of walls and full-height partitions. Normal maintenance, re-roofing, painting or...
wallpapering, or changes to mechanical and electrical systems are not alterations unless they affect the usability of the building or facility.

**Area of Rescue Assistance**
An area, which has direct access to an exit, where people who are unable to use stairs may remain temporarily in safety to await further instructions or assistance during emergency evacuation.

**Assembly Area**
A room or space accommodating a group of individuals for recreational, educational, political, social, civic, or amusement purposes, or for the consumption of food and drink.

**Automatic Door**
A door equipped with a power-operated mechanism and controls that open and close the door automatically upon receipt of a momentary actuating signal. The switch that begins the automatic cycle may be a photoelectric device, floor mat, or manual switch (see power-assisted door).

**Auxiliary Aids and Services**
The term auxiliary aids and services include:

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

**Building**
Any structure used and intended for supporting or sheltering any use or occupancy.

**Bus Stop**
A place on a road, typically marked with signage, where buses stop to let passengers on and off.

**Cape Seal**
Thin surface treatment constructed by applying a slurry seal or microsurfacing to a newly constructed chip seal. It is designed to be an integrated system where the primary purpose of the slurry is to fill voids in the chip seal.

**Chip Seals**
Placing graded stone (chips) on liquid emulsified asphalt sprayed on pavement surface. The surface is rolled to enable seating of chips.

**Circulation Path**
An exterior or interior way of passage from one place to another for pedestrians, including, but not limited to, walks, hallways, courtyards, stairways, and stair landings.
Clear
Unobstructed.

Clear Floor Space
The minimum unobstructed floor or ground space required to accommodate a single, stationary wheelchair and occupant.

Closed Circuit Telephone
A telephone with dedicated line(s) such as a house phone, courtesy phone or phone that must be used to gain entrance to a facility.

Common Use
Refers to those interior and exterior rooms, spaces, or elements that are made available for the use of a restricted group of people (for example, occupants of a homeless shelter, the occupants of an office building, or the guests of such occupants).

Complaint
Claimed violation of the ADA.

Crack Filling and Sealing
Placing elastomeric material directly into cracks in pavement.

Cross Slope
The slope that is perpendicular to the direction of travel (see running slope).

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

Detectable Warning
A standardized surface feature built in or applied to walking surfaces or other elements to warn visually impaired people of hazards on a circulation path.

Diamond Grinding
Using a gang saw to cut grooves in the pavement surface to restore smoothness and eliminate any joint faulting.

Disability
The term disability means, with respect to an individual:

- A physical or mental impairment that substantially limits one or more of the major life activities of such individual;
- A record of such impairment; or
- Being regarded as having such impairment.

Discrimination on the Basis of Disability
Discrimination on the basis of disability means to:
• Limit, segregate, or classify a citizen in a way that may adversely affect opportunities or status because of the person's disability;
• Limit, segregate, or classify a participant in a program or activity offered to the public in a way that may adversely affect opportunities or status because of the participant's disability;
• Participate in a contract that could subject a qualified citizen with a disability to discrimination;
• Use any standards, criteria, or methods of administration that have the effect of discriminating on the basis of disability;
• Deny equal benefits because of a disability;
• Fail to make reasonable accommodations to known physical or mental limitations of an otherwise qualified individual unless it can be shown that the accommodation would impose an undue burden on the City's operations;
• Use selection criteria that exclude otherwise qualified people with disabilities from participating in the programs or activities offered to the public; and
• Fail to use tests, including eligibility tests, in a manner that ensures that the test results accurately reflect the qualified applicant's skills or aptitude to participate in a program or activity.

**Dowel Retrofit**
Associated with concrete pavement. This work involves the installation of dowel bars connecting slabs in existing pavements. Pavement with dowel bar retrofits can have life extensions of as much as 20 years. Its application is almost exclusively on high-speed Interstate highways.

**Dwelling Unit**
A single unit which provides a kitchen or food preparation area, in addition to rooms and spaces for living, bathing, sleeping, and the like. Dwelling units include a single family home or a townhouse used as a transient group home; an apartment building used as a shelter; guest-rooms in a hotel that provide sleeping accommodations and food preparation areas; and other similar facilities used on a transient basis. For purposes of these guidelines, use of the term "Dwelling Unit" does not imply the unit is used as a residence.

**Egress, Means of**
A continuous and unobstructed way of exit travel from any point in a building or facility to a public way. A means of egress comprises vertical and horizontal travel and may include intervening room spaces, doorways, hallways, corridors, passageways, balconies, ramps, stairs, enclosures, lobbies, horizontal exits, courts and yards. An accessible means of egress is one that complies with these guidelines and does not include stairs, steps, or escalators. Areas of rescue assistance or evacuation elevators may be included as part of accessible means of egress.

**Element**
An architectural or mechanical component of a building, facility, space, or site, e.g., telephone, curb ramp, door, drinking fountain, seating, or water closet.
**Entrance**
Any access point to a building or portion of a building or facility used for the purpose of entering. An entrance includes the approach walk, the vertical access leading to the entrance platform, the entrance platform itself, vestibules if provided, the entry door(s) or gate(s), and the hardware of the entry door(s) or gate(s).

**Facility**
All or any portion of buildings, structures, site improvements, complexes, equipment, roads, walks, passageways, parking lots, or other real or personal property located on a site.

**Fog Seals**
Type of surface sealing.

**Ground Floor**
Any occupiable floor less than one story above or below grade with direct access to grade. A building or facility always has at least one ground floor and may have more than one ground floor as where a split level entrance has been provided or where a building is built into a hillside.

**Having a Record of Impairment**
An individual is disabled if he or she has a history of having an impairment that substantially limits the performance of a major life activity; or has been diagnosed, correctly or incorrectly, as having such impairment.

**In-place Asphalt Recycling**
Process of heating and removing around 1-2 inches of existing asphalt and remixing the asphalt with the addition of a binder additive and possible aggregate to restore the wearing surface for placement and compaction. All of this is performed in a train of equipment.

**Joint Crack Seals**
Associated with concrete pavement. This work consists of routing and cleaning existing cracks and joints and resealing to prevent water and non-compressibles from entering into the pavement joints and subgrade materials.

**Joint Repairs**
Associated with concrete pavement. This work consists of selectively repairing portions of the pavement where the slabs are generally in good condition, but corners or joints are broken. The depth of the patch could be full depth or partial depth.

**Mezzanine or Mezzanine Floor**
That portion of a story which is an intermediate floor level placed within the story and having occupiable space above and below its floor.

**Marked Crossing**
A crosswalk or other identified path intended for pedestrian use in crossing a vehicular way.
**Microsurfacing**
Spreading a properly proportioned mixture of polymer modified asphalt emulsion, mineral aggregate, mineral filler, water, and other additives, on a paved surface. Microsurfacing differs from slurry seal in that it can be used on high volume roadways to correct wheel path rutting and provide a skid resistant pavement surface.

**Multifamily Dwelling**
Any building containing more than two dwelling units.

**Occupiable**
A room or enclosed space designed for human occupancy in which individuals congregate for amusement, educational or similar purposes, or in which occupants are engaged at labor, and which is equipped with means of egress, light, and ventilation.

**Open-graded Surface Course**
Also known as “opengraded friction course,” involves a pavement surface course that consists of a highvoid, asphalt concrete mix that permits rapid drainage of rainwater through the course and off the shoulder of the road. The mixture consists of either Polymermodified or rubber-modified asphalt binder, a large percentage of one-sized coarse aggregate, and a small amount of fibers. This treatment prevents tires from hydroplaning and provides a skid-resistant pavement surface with significant noise reduction.

**Operable Part**
A part of a piece of equipment or appliance used to insert or withdraw objects, or to activate, deactivate, or adjust the equipment or appliance (for example, coin slot, pushbutton, handle).

**Pavement Patching**
Selectively repairing portions of the pavement where the slabs are generally in good condition, but corners or joints are broken. The depth of the patch could be full depth or partial depth.

**Pedestrian Push Button (also known as a call button)**
Buttons that are installed at traffic lights that possess a dedicated pedestrian signal. Depressing the button is intended to alert the traffic signal of the presence of a pedestrian, which should in turn provide the pedestrian with an indication when it is lawful to cross the roadway.

**Physical or Mental Impairments**
May include, but are not limited to: vision, speech, and hearing impairments; emotional disturbance and mental illness; seizure disorders; mental retardation; orthopedic and neuromotor disabilities; learning disabilities; diabetes; heart disease; nervous conditions; cancer; asthma; Hepatitis B; HIV infection (HIV condition); and drug addiction if the addict has successfully completed or is participating in a rehabilitation program and no longer uses illegal drugs.

The following conditions are not physical or mental impairments: transvestitism; illegal drug use; homosexuality or bisexuality; compulsive gambling; kleptomania; pyromania; pedophilia; exhibitionism; voyeurism; pregnancy; height; weight; eye color; hair color; left-handedness; poverty; lack of education; a prison record; and poor judgment or quick temper if not symptoms
of a mental or physiological disorder.

**Power-assisted Door**

A door used for human passage with a mechanism that helps to open the door, or relieves the opening resistance of a door, upon the activation of a switch or a continued force applied to the door itself.

**Private Facility**

A place of public accommodation or a commercial facility subject to title III of the ADA and 28 C.F.R. part 36 or a transportation facility subject to title III of the ADA and 49 C.F.R. 37.45.

**Public Facility**

A facility or portion of a facility constructed by, on behalf of, or for the use of a public entity subject to title II of the ADA and 28 C.F.R. part 35 or to title II of the ADA and 49 C.F.R. 37.41 or 37.43.

**Public Use**

Describes interior or exterior rooms or spaces that are made available to the general public. Public use may be provided at a building or facility that is privately or publicly owned.

**Qualified Individual with a Disability**

A qualified individual with a disability means an individual with a disability who, with or without reasonable modification to rules, policies, or practices; the removal of architectural, communication, or transportation barriers; or the provision of auxiliary aids and services, meets the essential eligibility requirements for the receipt of services or the participation in programs or activities provided by the City.

**Ramp**

A walking surface which has a running slope greater than 1:20.

**Reasonable Program Modifications**

If the individual’s disabilities prevent them from performing the essential functions of the program or activity, it is necessary to determine whether reasonable program modifications would enable an individual to perform the essential functions of the program or activity.

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

- To a registration or application process to enable an individual with a disability to be considered for the program or activity;
- To the program or activity environment in which the duties of a position are performed so that a person with a disability can perform the essential functions of the program or activity; and
- That enables individuals with disabilities to enjoy equally the benefits of the program or activity as other similarly situated individuals without disabilities enjoy.
Modification includes making existing facilities and equipment used by individuals readily accessible and usable by individuals with disabilities.

Modification applies to:

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

Modification is not required if:

- It changes the essential nature of a program or activity of the person with a disability;
- It creates a hazardous situation;
- Adjustments or modifications requested are primarily for the personal benefit of the individual with a disability; or
- It poses an undue burden on the City.

**Reconstruction**

Removing all or a significant portion of the pavement material and replacing it with new or recycled materials. This may include full-depth reclamation, where the pavement surface is demolished in place and new pavement surface is applied. In addition, reconstruction may also include grinding up a portion of the pavement surface, recycling it and placing it back, and then adding a wearing surface, such as in cold in-place asphalt recycling. Reconstruction often includes widening or geometrical changes to the roadway profile.

**Regarded as Having a Disability**

An individual is disabled if she or he is treated or perceived as having an impairment that substantially limits major life activities, although no such impairment exists.

**Rehabilitation**

Significant repairs made to a road or highway surface, including activities such as full slab replacement, filling voids under slabs (slabjacking), widening, and adding additional structural capacity.

**Running Slope**

The slope that is parallel to the direction of travel (see cross slope).

**Scrub Sealing**

Type of surface sealing

**Service Entrance**

An entrance intended primarily for delivery of goods or services.

**Signage**

Displayed verbal, symbolic, tactile, and pictorial information.

**Site**

A parcel of land bounded by a property line or a designated portion of a public right-of-way.
**Site Improvement**

Landscaping, paving for pedestrian and vehicular ways, outdoor lighting, recreational facilities, and the like, added to a site.

**Slurry Seal**

Spraying a mixture of slow setting emulsified asphalt, well graded fine aggregate, mineral filler, and water on the pavement surface. It is used to fill cracks and seal areas of old pavements, to restore a uniform surface texture, to seal the surface to prevent moisture and air intrusion into the pavement, and to improve skid resistance.

**Space**

A definable area, e.g., room, toilet room, hall, assembly area, entrance, storage room, alcove, courtyard, or lobby.

**Spot High-friction Treatments**

Using epoxy based resin liquids as a binder for an aggregate with high-friction properties. These are used in locations where drivers are frequently braking and the pavement surface has less resistance to slipping.

**Story**

That portion of a building included between the upper surface of a floor and upper surface of the floor or roof next above. If such portion of a building does not include occupiable space, it is not considered a story for purposes of these guidelines. There may be more than one floor level within a story as in the case of a mezzanine or mezzanines.

**Structural Frame**

The structural frame shall be considered to be the columns and the girders, beams, trusses and spandrels having direct connections to the columns and all other members which are essential to the stability of the building as a whole.

**Substantial Limitations on Major Life Activities**

Individuals are disabled if they have a physical or mental impairment that (a) renders them unable to perform a major life activity, or (b) substantially limits the condition, manner, or duration under which they can perform a particular major life activity in comparison to other people.

Major life activities are functions such as caring for oneself, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working.

In determining whether physical or mental impairment substantially limits the condition, manner, or duration under which an individual can perform a particular major life activity in comparison to other people, the following factors shall be considered:

- The nature and severity of the impairment;
- The duration or expected duration of the impairment; and
- The permanent or long-term impact (or expected impact) of or resulting from the impairment.
**Surface Sealing**
Applying liquid sealant to pavement surface in order to stop water penetration and/or reduce oxidation of asphalt products. Sand is sometimes spread over liquid to absorb excess material.

**TDD (Telecommunication Devices for the Deaf)**
See text telephone.

**TTY (Tele-Typewriter)**
See text telephone.

**Tactile**
Describes an object that can be perceived using the sense of touch.

**Technically Infeasible**
See 4.1.6(1)(j) EXCEPTION.

**Text Telephone (TTY)**
Machinery or equipment that employs interactive text based communications through the transmission of coded signals across the standard telephone network. Text telephones can include, for example, devices known as TDDs (telecommunication display devices or telecommunication devices for deaf persons) or computers with special modems. Text telephones are also called TTYs, an abbreviation for tele-typewriter.

**Thin Lift Overlays**
Thin applications of mixtures of hot mix asphalt. Thin lift overlays may also require some milling along curbs, manholes, existing curb cuts, or other road structures to assure proper drainage and cross slopes.

**Transfer Device**
Equipment designed to facilitate the transfer of a person from a wheelchair or other mobility device to and from an amusement ride seat.

**Undue Burden**
The City of Roseburg shall not provide an accommodation that imposes an undue burden on the operation of the City’s business.

Undue burden means significant difficulty or expense incurred in the provision of accommodation. Undue burden includes, but is not limited to, financial difficulty. Undue burden refers to any modification that would be unduly costly, extensive, substantial, or disruptive, or that would fundamentally alter the nature of operation of the business of the City.

Whether a particular accommodation will impose an undue hardship is determined on a case-by-case basis. If a particular modification is determined to cause an undue burden to the City of Roseburg, the City shall attempt to identify another modification that would not pose such a burden. If cost causes the undue burden, the City must consider whether funding for modification is available from an outside source. If no such funding is available, the City must give the person with a disability the opportunity to provide the modification or to pay for that
portion of the modification that constitutes an undue burden.

The following factors shall be considered in determining whether a program modification would create an undue burden: the nature and cost of the modification, the financial resources of the City available to make the modification, the impact the expense of the accommodation will have on the affected City operation, and the permanence of the alterations affecting the site.

**Vehicular Way**

A route intended for vehicular traffic, such as a street, driveway, or parking lot.

**Walk**

An exterior pathway with a prepared surface intended for pedestrian use, including general pedestrian areas such as plazas and courts.

The above is a sampling of many typical definitions found in the ADA. Please refer to the Americans with Disabilities Act for the full text of definitions and explanations: (http://www.ada.gov).
Appendix F
Resources
THIS PAGE INTENTIONALLY LEFT BLANK
Resources

Introduction
The City of Roseburg may not, through operation and maintenance of inaccessible facilities, deny the benefits of its services, activities, and programs to individuals with disabilities. While this does not require that all of the City’s existing facilities be made accessible, the “program accessibility” standard envisions the City’s services, activities, and programs as an integrated and accessible whole.

Through the ADA Transition Plan and the resources identified in this appendix, a comprehensive collection of information is available to all employees and representatives of the City. These resources are intended to provide starting points for the creation and maintenance of successful program accessibility standards and guidelines. As with any collection of resources, the City should anticipate adding to and revising these guidelines when necessary and when new resources become known.

Federal Accessibility Standards and Regulations
The City is subject to both Federal and State of Oregon regulations for program accessibility and accessible facilities. Below are resources for both the Federal and State facility regulations.

U.S. Department of Justice

As the foundation of improved accessibility measures, the U.S. Department of Justice provides free ADA materials including the complete Americans with Disability Act text. Printed materials may be ordered by calling the ADA Information Line at (800) 514-0301 for voice or (800) 514-0383 text telephone (TTY). Publications are available in standard print as well as large print, audiotape, Braille, computer disk, and download for broad accessibility. Documents, including the following publications, can also be downloaded from the Department of Justice website: https://www.justice.gov/

ADA Regulation for Title II: This publication provides a comprehensive description of Title II of the Americans with Disabilities Act, Pub. L. 101-336, which prohibits discrimination on the basis of disability by public entities. This rule adopts the general prohibitions of discrimination established under section 504, as well as the requirements for making programs accessible to individuals with disabilities and for providing equally effective communications. It also sets forth standards for what constitutes discrimination on the basis of mental or physical disability, provides a definition of disability and of qualified individual with a disability, and establishes a complaint mechanism for resolving allegations of discrimination. It further provides an in-depth narrative on the history and development of the ADA over time. This information is beneficial to understand the context in which these guidelines and standards are applied. http://www.ada.gov/regs2010/titleII_2010/titleII_2010_regulations.htm

Title II Technical Assistance Manual (1993) and Yearly Supplements: This manual seeks to
provide a focused, systematic description of the ADA’s requirements, outlining what state and local governments must do to ensure that their services, programs and activities are provided to the public in a nondiscriminatory manner. Extensive use of question and answer format is intended to create a more functional document for those outside of the legal profession.

http://www.ada.gov/taman2.html

**Accessibility of State and Local Government Websites to People with Disabilities:** This brief and approachable publication provides guidance for state and local government intending to make their websites accessible to individuals with disabilities. Services discussed include everything from renewing library books to applying for jobs within the City.

http://www.ada.gov/websites2.htm

**The ADA and City Governments: Common Problems**
A reference document that contains samples of common problems shared by city governments of all sizes, provides examples of common deficiencies and explains how these problems affect persons with disabilities.

http://www.ada.gov/comprob.htm

**ADA Guide for Small Towns | PDF**
A guide that recognizes some of the challenges faced by small municipalities in implementing ADA accessibility programs. Accordingly, this document presents an overview of basic ADA requirements and provides cost-effective tips on how small towns can comply with the ADA. It is a useful resource for cities of all sizes as many of the practical suggestions are widely applicable.

http://www.ada.gov/smtown.htm

**ADA Checklist for Polling Places | PDF**
This three-part publication discusses the importance of accessible polling places, several proven tools for improving accessibility of polling places, and an effective checklist used as a self-help survey for voting officials to determine whether a polling place has basic accessible features needed by most voters with disabilities.

http://www.ada.gov/votingchecklist.htm

**An ADA Guide for Local Governments: Making Community Emergency Preparedness and Response Programs Accessible to People with Disabilities | PDF**
This link provides access to both PDF publications and the website to improve understanding of how to make community emergency preparedness and response programs accessible to people with disabilities. This is especially important for the City of Roseburg in light of Oregon’s State Resiliency Planning.

http://www.ada.gov/emergencyprep.htm

**Access for 9-1-1 and Telephone Emergency Services | PDF**
As described within the webpage, “the Americans with Disabilities Act (ADA) requires all Public Safety Answering Points (PSAPs) to provide direct, equal access to their services for people with disabilities who use teletypewriters (TTYs), which are also known as telecommunications devices for the deaf (TDDs)."

This webpage provides State and local governments and persons with disabilities with information about the requirements of the ADA for direct, equal access to 9-1-1 emergency services.

http://www.ada.gov/911ta.htm

**ADA Information for Law Enforcement:** This webpage provides several additional resources...
to help state and local law enforcement officers understand how to interact with victims, witnesses, suspects and others who have disabilities. [http://www.ada.gov/policeinfo.htm](http://www.ada.gov/policeinfo.htm)

**Commonly Asked Questions About the ADA and Law Enforcement**
This publication presents resources and information for law enforcement agencies in a question and answer format, to better understand how to comply with the ADA.
[http://www.ada.gov/q&a_law.htm](http://www.ada.gov/q&a_law.htm)

**Communicating with People Who Are Deaf or Hard of Hearing: ADA Guide for Law Enforcement Officers**
This portable guide provides law enforcement officers with basic information about ADA requirements and how to effectively and appropriately communicate with people who are deaf or hard of hearing.
[http://www.ada.gov/lawenfcomm.htm](http://www.ada.gov/lawenfcomm.htm)

**Model Policy for Law Enforcement on Communicating with People Who Are Deaf or Hard of Hearing**
Expanding on the publication "Communicating with People Who Are Deaf or Hard of Hearing: ADA Guide for Law Enforcement Officers," this document provides a template for law enforcement agencies to adopt policies on effective communication with people who are deaf or hard of hearing. It further encourages agencies to utilize and adapt the policy to fit their specific requirements.
[http://www.ada.gov/lawenfmodpolicy.htm](http://www.ada.gov/lawenfmodpolicy.htm)

**Questions and Answers: The ADA and Hiring Police Officers**
This publication provides law enforcement agencies with guidance on how to ensure their organization guarantees equal opportunity to jobs for qualified individuals with disabilities.
[http://www.ada.gov/copsq7a.htm](http://www.ada.gov/copsq7a.htm)

**U.S. Access Board Publications**
As stated on the U.S. Access Board website home page, “The U.S. Access Board is a federal agency that promotes equality for people with disabilities through leadership in accessible design and the development of accessibility guidelines and standards for the built environment, transportation, communication, medical diagnostic equipment, and information technology.”

The U.S. Access Board’s website provides a clearinghouse for the full texts of federal laws and regulations that provide the guidelines for the design of accessible facilities and programs. Copies of publications are available free and can be downloaded or ordered by completing a form available on the Access Board’s website. In addition to regular print, publications are available in large print, disk, audiocassette and Braille.

Specifically, the U.S. Access Board divides its guidelines and standards into the following sections:

- Communications and Information Technology (IT)
- Buildings and Sites
- Recreation Facilities
- Streets and Sidewalks
- Transportation
- Health Care
Each section is briefly described below using the text and information provided by the U.S. Access Board website, followed by links to the resources provided by the Board.

http://www.access-board.gov/

COMMUNICATIONS & IT
Section 508 of the Rehabilitation Act and Section 255 of the Telecommunications Act provide the framework for the Board’s standards and guidelines on accessible information and communication technology (ICT).


BUILDINGS & SITES
Standards issued under the Americans with Disabilities Act (ADA) address access to buildings and sites nationwide in new construction and alterations. Similar standards apply to building and sites funded by the Federal government under Architectural Barriers Act (ABA).

2010 ADA Standards for Accessible Design: This set of documents contains comprehensive scoping and technical requirements for accessibility to buildings and facilities by individuals with disabilities under the Americans with Disabilities Act (ADA) of 1990. These scoping and technical requirements are to be applied during the design, construction and alteration of buildings and facilities covered by Titles II and III of the ADA, to the extent required by regulations issued by federal agencies including the Department of Justice and the Department of Transportation. This document must be used in conjunction with Chapter 11 - Accessibility of the Oregon Structural Specialty Code. http://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-ada-standards/ada-standards

ABA Standards for Accessible Design: Standards issued under the Architectural Barriers Act (ABA) apply to facilities designed, built, altered, or leased with certain federal funds. The law applies to federal buildings, including post offices, social security offices, federal courthouses and prisons, and national parks. It also covers non-federal facilities, such as public housing units and mass transit systems, built or altered with federal grants or loans. https://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-aba-standards

Emergency Transportable Housing: Potentially relevant to any Oregon city facing Cascadia Earthquake preparations, the Board has issued guidelines for temporary housing provided by the government in emergencies and natural disasters. https://www.access-board.gov/guidelines-and-standards/buildings-and-sites/emergency-
Classroom Acoustics Rulemaking: The Board is undertaking rulemaking to supplement the ADA and ABA Accessibility Guidelines to address acoustics in classrooms. Specifically, the Board’s effort will focus on applying a voluntary consensus standard developed by the Acoustical Society of America (ASA) with support from the Board. [https://www.access-board.gov/guidelines-and-standards/buildings-and-sites/classroom-acoustics](https://www.access-board.gov/guidelines-and-standards/buildings-and-sites/classroom-acoustics)

RECREATION FACILITIES
Access to recreation facilities, including amusement rides, recreational boating facilities, exercise machines and equipment, fishing piers and platforms, golf and miniature golf facilities, play areas, swimming and wading pools, spas, and shooting facilities with firing positions, is addressed in both the ADA and ABA standards. The ABA standards address outdoor developed areas guidelines which cover access to trails, picnic sites, camping sites and beach access routes on Federal sites.

**ADA for Recreation Facilities:** This page provides access to a series of guides on recreation facilities and further explains the requirements of the standards for each type of recreation listed. [http://www.access-board.gov/guidelines-and-standards/recreation-facilities/about-recreation-facilities](http://www.access-board.gov/guidelines-and-standards/recreation-facilities/about-recreation-facilities)

**ABA for Outdoor Developed Areas:** This page provides resources to guide the improvement of accessibility to outdoor developed areas under the jurisdiction or funding of the Federal government. Also included are exceptions for situations where terrain and other factors make compliance impracticable. [http://www.access-board.gov/guidelines-and-standards/recreation-facilities/outdoor-developed-areas](http://www.access-board.gov/guidelines-and-standards/recreation-facilities/outdoor-developed-areas)

STREETS AND SIDEWALKS
New guidelines in development by the Board cover access to public rights-of-way, including sidewalks, intersections, street crossings and on-street parking. The Board is also addressing access to shared use paths providing off-road means of transportation and recreation.


TRANSPORTATION
Access to public transportation is required by the Americans with Disabilities Act (ADA) and other laws. Standards issued under the ADA address access to facilities and to vehicles of public transit systems. The Board is developing new guidelines for passenger vessels under the ADA.

**Transportation Facilities:** Access to public transportation is required by the Americans...
with Disabilities Act (ADA) and other laws. Standards issued under the ADA address access to facilities and to vehicles of public transit systems. The Board is developing new guidelines for passenger vessels under the ADA. [https://www.access-board.gov/guidelines-and-standards/transportation/facilities/about-the-ada-standards-for-transportation-facilities](https://www.access-board.gov/guidelines-and-standards/transportation/facilities/about-the-ada-standards-for-transportation-facilities)

**Transportation Vehicles:** The Board’s ADA Accessibility Guidelines for Transportation Vehicles apply to buses, vans, rail cars, and other modes of public transit and serve as the basis for standards maintained by the U.S. Department of Transportation that apply to new or remanufactured vehicles. [https://www.access-board.gov/guidelines-and-standards/transportation/vehicles/about-adaag-for-transportation-vehicles](https://www.access-board.gov/guidelines-and-standards/transportation/vehicles/about-adaag-for-transportation-vehicles)

State of Oregon Accessibility Standards and Regulations

**Oregon Structural Specialty Code: Chapter 11 - Accessibility**

By way of ORS 447.220 and 447.231, the State of Oregon adopted a set of design guidelines for accessible facilities, which are presented in Chapter 11 of the Oregon Structural Specialty Code (OSSC). The OSSC contains general building design and construction requirements relating to fire and life safety, structural safety and access compliance. OSSC provisions provide minimum standards to safeguard life or limb, health, property and public welfare by regulating and controlling the design, construction, quality of materials, use and occupancy, location and maintenance of all buildings and structures and certain equipment. The Oregon Building Code Division follows the 2009 International Building Code (IBC) with amendments and provisions specific to the State of Oregon.

Because building codes are updated every few years, the City should have an ongoing program of regularly reviewing changes and updating policies and procedures related to accessibility to ensure compliance with current code. [http://ecodes.biz/ecodes_support/free_resources/Oregon/14_Structural/PDFs/Chapter%2011%20-%20Accessibility.pdf](http://ecodes.biz/ecodes_support/free_resources/Oregon/14_Structural/PDFs/Chapter%2011%20-%20Accessibility.pdf)

Miscellaneous Resources

**Organizations Available Within the State of Oregon**


**Aging and Disability Resource Connection of Oregon (ADRC):** The ADRC is a statewide resource providing information about local public and privately paid services to address aging or disability needs. The organization’s trained professional staff can help with immediate needs or planning for the future. [https://adrcforegon.org](https://adrcforegon.org)
**Autism Society of Oregon (ASO):** An affiliate of the national Autism Society the ASO aims to be Oregon’s leading organization providing resources, education, advocacy and support for individuals and families living with Autism. [http://autismsocietyoregon.org/](http://autismsocietyoregon.org/)

**Northwest ADA Center, National Institute on Disability and Rehabilitation Research:** The ADA National Network Centers are a national platform of ten centers comprised of ADA professionals and experts charged with assisting businesses, state and local governments and people with disabilities as they manage the process of changing the Northwest’s culture to be user friendly to disability and the effect the variety of health conditions can have on society. The Northwest ADA Center is a part of the Department of Rehabilitation Medicine at the University of Washington, and collaborates with the Center for Technology and Disability Studies, a program within the Center for Human Development and Disability and the Department of Rehabilitation Medicine. [http://nwadacenter.org/](http://nwadacenter.org/)

**Oregon Department of Human Services, Aging and People with Disabilities:** The mission of the Oregon Department of Human Services, Aging and People with Disabilities is to make it possible for seniors and people with disabilities to become independent, healthy and safe with opportunities for community living, employment, family support and services that promote independence, choice and dignity. [http://www.oregon.gov/DHS/spwpd/Pages/index.aspx](http://www.oregon.gov/DHS/spwpd/Pages/index.aspx)

**Oregon Disabilities Commission:** Initially formed in 1983 and re-formed in 2005 after a brief hiatus, the Oregon Disabilities Commission (ODC) is a Governor-appointed commission housed in the Department of Human Services. The commission is composed of 15 members broadly representative of major public and private agencies who are experienced in or have demonstrated particular interest in the needs of individuals with disabilities. [http://www.oregon.gov/DHS/SENIORS-DISABILITIES/ADVISORY/ODC/Pages/index.aspx](http://www.oregon.gov/DHS/SENIORS-DISABILITIES/ADVISORY/ODC/Pages/index.aspx)

**State Independent Living Council:** Independent Living Services are designed to help individuals who experience disabilities achieve personal goals for independence and participation in their families and communities. The five services considered to be the core of the Independent Living program are: Information and Referral; Independent Living Skills Training; Peer Counseling; Individual and Systems Advocacy; Life Transition Assistance (related to youth leaving secondary education, or individuals transitioning to or remaining in the least restrictive living environment). [http://www.oregon.gov/DHS/SENIORS-DISABILITIES/SILC/Pages/services.aspx](http://www.oregon.gov/DHS/SENIORS-DISABILITIES/SILC/Pages/services.aspx)

**Alternative Format Communications**
As part of the City’s Program Accessibility improvements, alternative format communications such as Braille, audiotape, large-print text and accessible electronic media should be incorporated into standardized publications such as applications and registration forms.

Additionally, systems and devices to amplify sound for persons with hearing disabilities should be available for public meetings and events. Technologies for these devices continue to
improve, and some are tailored to different types of hearing disabilities. When selecting assistive communication devices, each should be evaluated to reach the greatest number of individuals with disabilities.

The following resources are available for alternative format communications.

**American Council of the Blind:** ACB is a national organization advocating on behalf of persons who are blind or have low vision. ACB also publishes "A Guide to Making Documents Accessible to People Who Are Blind or Visually Impaired" in several accessible formats. [http://www.acb.org/](http://www.acb.org/).

**National Center on Accessibility:** NCA publishes “What are Alternative Formats? How Do They Apply to Programs and Services?” this is available for downloading from their website. [http://www.ncaonline.org/](http://www.ncaonline.org/).

**National Center for Accessible Media:** NCAM is a research and development facility dedicated to the issues of media and information technology for people with disabilities in their homes, schools, workplaces and communities. Developers of Web- and CD-ROM-based multimedia need an authoring tool for making their materials accessible to persons with disabilities. NCAM has developed two such tools, version 1.0 and 2.01 of the Media Access Generator (MAGpie), for creating captions and audio descriptions for rich media. MAGpie is available for downloading from NCAM’s website. [http://ncam.wgbh.org](http://ncam.wgbh.org)

**Oregon Deaf and Hard of Hearing Services Program:** To provide greater access to public events such as City Council meetings, American Sign Language interpreter should be available upon request. The Oregon Deaf and Hard of Hearing Services (ODHHS) program is available to provide interpreters for clients that are members of the deaf, deaf-blind, or hard-of-hearing communities. [http://www.oregon.gov/DHS/BUSINESS-SERVICES/ODHHS/Pages/index.aspx](http://www.oregon.gov/DHS/BUSINESS-SERVICES/ODHHS/Pages/index.aspx)

**ASSISTIVE LISTENING SYSTEMS AND DEVICES**

An array of assistive listening systems and devices are available for the City to incorporate into its Program Accessibility efforts. The following is a brief overview of several established technologies.

**TDI:** TDI's (formerly known as Telecommunications for the Deaf, Inc.) mission is to promote equal access in telecommunications and media for people who are deaf, hard of hearing, late deafened or deaf blind. TDI's on-line resources include information about telecommunications access such a TTY, pagers, telephony, VoIP and more. [http://tdiforaccess.org/](http://tdiforaccess.org/)

**Text Telephone (TTY):** City programs should have access to a text telephone or have access to a telephone transfer service as required by the law and offered by public telephone companies. Refer to the Telecommunications Products (1194.23) overview on the U.S. Access Board’s website. [https://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-section-508-standards/guide-to-the-section-508-standards/telecommunications-products-1194-23](https://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-section-508-standards/guide-to-the-section-508-standards/telecommunications-products-1194-23)
Closed Caption Machine: To the extent practical, City departments should have access to a device for encoding closed captioning on films and videotapes used for training and other programs.

Optical Readers: Equipment that can translate printed information into an audio format should be available to the City programs.

Video Relay Services (VRS): Video Relay Service (VRS) is a form of Telecommunications Relay Service (TRS) that enables persons with hearing disabilities who use American Sign Language to communicate with voice telephone users through video equipment, rather than through typed text. Video equipment links the VRS user with a TRS operator – called a “communications assistant” (CA) – so that the VRS user and the CA can see and communicate with each other in signed conversation. Because the conversation between the VRS user and the CA flows much more quickly than with a text-based TRS call, VRS has become a popular form of TRS. https://www.fcc.gov/consumers/guides/video-relay-services

Hands on Video Relay Service: (877) 467-4877 for English, or (877) 467-4875 for Spanish


GUIDE TO DISABILITIES AND DISABILITY ETIQUETTE
A guide to disabilities and disability etiquette should be assembled and distributed to City staff and representatives. Such a guide helps ensure that City representatives are familiar with a variety of types of disabilities and sensitive to the abilities and needs of people with disabilities in order not to offend or demean them. An example of such a brochure is available through the Judicial Council of California: http://www.courts.ca.gov/documents/access-fairness-etiquette-2009.pdf

Resources for Providing Accessible Programs and Facilities

ADA Document Portal: According to the search service’s homepage, “The ADA Web Search Portal is a focused Google search of important websites that contain information about the ADA. The purpose of the Portal is to connect individuals with high quality information about the Americans with Disabilities Act and to assist individuals in answering ADA questions.” https://adata.org/ada-document-portal

Office of Disability Employment Policy (ODEP): The Office of Disability Employment Policy (ODEP) is the only non-regulatory federal agency that promotes policies and coordinates with employers and all levels of government to increase workplace success for people with disabilities. https://www.dol.gov/odep/

National Center on Accessibility: Established through a cooperative agreement between Indiana University and the National Park Service, the National Center on Accessibility promotes access and inclusion for people with disabilities in parks, recreation and tourism. http://www.ncaonline.org/
National Center on Health, Physical Activity and Disability: The National Center on Health, Physical Activity and Disability (NCHPAD) is a public health practice and resource center on health promotion for people with disability. The NCHPAD seeks to help people with disability and other chronic health conditions achieve health benefits through increased participation in all types of physical and social activities, including fitness and aquatic activities, recreational and sports programs, adaptive equipment usage, and more. [http://www.nchpad.org/](http://www.nchpad.org/)

Smithsonian Institution: Pertinent to coordination with the Douglas County Museum, the Accessibility Program has developed the Smithsonian Guidelines for Accessible Exhibition Design and welcomes its broad application as well as suggestions to its improvement. [https://www.si.edu/Accessibility/SGAED](https://www.si.edu/Accessibility/SGAED)

Oregon Technology Access Program: The Oregon Technology Access Program (OTAP) provides training, information, technical assistance and resources regarding the uses of technology for children with disabilities. OTAP services are available to anyone concerned with the needs of Oregon's children with disabilities from birth to age twenty-one. The program is sponsored by the Oregon Department of Education (ODE). [http://www.otap-oregon.org](http://www.otap-oregon.org)

National Resources and Organizations Serving People with Disabilities

**The Arc**: The Arc is the country’s largest voluntary organization committed to the welfare of all children and adults with intellectual and developmental disabilities and their families. [http://www.thearc.org](http://www.thearc.org)


**American Foundation for the Blind (AFB)**: The AFB is committed to improving accessibility in all aspects of life—from cell phones to ATMs, on web sites and in workplaces. Services include assistance in making products and services accessible to people with visual impairments. [http://www.afb.org/](http://www.afb.org/)

**Center on Technology and Disability**: Funded by the U.S. Department of Education’s Office of Special Education Programs, the Center on Technology and Disability provides a wide range of resources on assistive technology, from introductory fact sheets and training materials to in-depth discussion of best practices and emerging research. Assistive and instructional technology (AT/IT) allows children across the ability spectrum to participate fully at home, in school, and in the community. [http://www.ctdinstitute.org/](http://www.ctdinstitute.org/)

**Disability Resources, Inc.**: Disability Resources, Inc. is a national nonprofit organization that provides information about resources for independent living. DRI maintains an on-line directory of assistive technology resources. [https://driabilene.org/](https://driabilene.org/)

**Institute for Human Centered Design (IHCD)**: The IHCD is an international non-governmental educational organization (NGO) committed to advancing the role of design in expanding opportunity and enhancing experience for people of all ages and abilities through excellence in design. IHCD’s work balances expertise in legally required accessibility with promotion of best practices in human-centered or universal design.
National Association of the Deaf (NAD): The NAD is a national consumer organization representing people who are deaf and hard of hearing. NAD provides information about standards for American Sign Language Interpreters and the Captioned Media Program on its website. [http://www.nad.org/](http://www.nad.org/)

National Federation of the Blind (NFB): The NFB is a national organization advocating on behalf of persons who are blind or have low vision. NFB provides on-line resources for technology for the blind, including a technology resource list, a computer resource list, screen access technology, sources of large print software for computers and sources of closed circuit TV (CCTV’s). [http://www.nfb.org/](http://www.nfb.org/)

National Organization on Disability (NOD): The NOD is a private, non-profit organization that promotes the full participation and contributions of America’s 57 million people with disabilities in all aspects of life. [http://www.nod.org/](http://www.nod.org/)

Paralyzed Veterans of America (PVA): PVA is a national advocacy organization representing veterans who have experienced spinal cord injury or dysfunction. [http://www.pva.org](http://www.pva.org)

United Cerebral Palsy Association (UCP): The UCP educates, advocates and provides support services to ensure a life without limits for people with a spectrum of disabilities. [http://www.ucp.org](http://www.ucp.org)

United Spinal Association: United Spinal Association is a membership organization dedicated to enhancing the quality of life of all people living with spinal cord injuries and disorders (SCI/D), including veterans, and providing support and information to loved ones, care providers and professionals. [http://www.unitedspinal.org](http://www.unitedspinal.org)

World Institute on Disability (WID): The WID is an international public policy center dedicated to carrying out research on disability issues. WID maintains an online information and resource directory on technology, research, universal design and ADA. [https://wid.org/](https://wid.org/)
Appendix G
Supporting Information
THIS PAGE INTENTIONALLY LEFT BLANK
Figure 3-1: Existing Street Classifications

Legend
- Freeway
- Arterial
- Collector
- Minor Collector
- Local
- Railroads
- City Boundary
- UGB Area

This map should only be used for general planning purposes. It is not intended for legal, engineering, and surveying purposes.
Different agencies in Oregon have different Functional Classification systems. The functional classes between jurisdictions have no correlation. Table 3-1 shows the functional classification systems used by the City of Roseburg, Douglas County, and ODOT. Douglas County further subdivides the classification into Rural and Urban roads. For this report, only the Urban Classification system is included, as this is what applies within the Roseburg UGB. Table 3-2 presents the functional classification for selected major roads by jurisdiction. Below are descriptions of the streets in Roseburg that are classified higher than a local road according to the city’s classification system.

The roadways within city limits presently classified as arterials by the City of Roseburg are:

- Garden Valley Boulevard
- Harvard Avenue
- Stewart Parkway
- Edenbower Boulevard between Stephens Street and Stewart Parkway
- Diamond Lake Boulevard
- Pine Street
- Stephens Street
- Washington Avenue
- Oak Avenue

The roadways within city limits presently classified as collector streets by the City of Roseburg are:

- Troost Street
- Mulholland Drive/Aviation Drive
- Lookingglass Road
- Douglas Avenue
- Ramp Street
- Winchester Street
- Garden Valley Boulevard (east of Stephens Street)
- Vine Street
- Alameda Avenue

The roadways within the Roseburg UGB presently classified as minor collector streets by the City of Roseburg are:

- Hughwood Drive
- Harvey Avenue
- Calkins Road
- Kline Street
- Valley View Drive (between Kline Street and Stewart Parkway)
- Keasey Street
- Renann Street
- Edenbower Boulevard (between Renann Street and Stewart Parkway)
- Airport Road
- Cedar Street (north of Chestnut Avenue)
- Walnut Street (north of Chestnut Avenue)
- Chestnut Avenue
- Lincoln Street
- Fulton Street
- Rifle Range Street
- Bellows Street
- Mosher Avenue
- Lane Avenue (east of Stephens Street)
- Jackson Street (between Mosher Avenue and Douglas Avenue), and
- Main Street (south of Douglas Avenue)

**Table 3-1. Functional Classification Systems**

<table>
<thead>
<tr>
<th>City of Roseburg</th>
<th>Douglas County*</th>
<th>ODOT*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Freeway</td>
<td>Principal Arterial</td>
<td>Interstate Highway</td>
</tr>
<tr>
<td>Arterial</td>
<td>Minor Arterial</td>
<td>Urban Principal Arterial</td>
</tr>
<tr>
<td>Collector</td>
<td>Collector</td>
<td>Urban Minor Arterial</td>
</tr>
<tr>
<td>Minor Collector</td>
<td>Local Access</td>
<td>Urban Collector</td>
</tr>
<tr>
<td>Local Street</td>
<td>*Urban Area</td>
<td>Urban Local Street</td>
</tr>
<tr>
<td>Cul-de-sac Street</td>
<td>Classifications</td>
<td>*Urban is applied for areas with over 5,000 people.</td>
</tr>
</tbody>
</table>
Appendix H
Facility Data Sheets
(Under Separate Cover)
THIS PAGE INTENTIONALLY LEFT BLANK