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# Transition Plan for ADA Compliance

For Pedestrian Facilities Located within Public Right-of-Way

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## City of Trussville

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ENGINEERING BETTER PARTNERSHIPS

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## 1.0 Introduction

### 1.1 City of Trussville

On June 10, 1947, Trussville was incorporated as a town, and on May 31, 1957, the town officially became a city. It was on this date the City of Trussville was adopted as the official name.

Today Trussville is one of the Birmingham region's most rapidly growing areas. Between 1980 and 2010, the city grew by over 500%. It has seen much residential and retail construction with two major shopping centers built during the early 2000s: the Colonial Promenade at Trussville on its western side and both the Colonial Promenade Tutwiler Farm and Pinnacle at Tutwiler Farm along Highway 11 at the I-59/I-459 interchange.

Attracted by good schools, a safe environment, and friendly atmosphere, Trussville has become a drawing card for young middle-income families. Many have gravitated to older homes in the Cahaba Project, often upgrading or remodeling them. Numerous subdivisions and residential areas have also sprung up within its boundaries. The city now extends from I-459 northward to the Jefferson County line, and takes in a sizable area west of I-59. A major 120-acre complex for youth sports was completed in the mid-1990s. The public library completed a major expansion in 1997, and a senior citizens activity center opened in 1999.

The City of Trussville employs approximately 215 people. The elected officials include a Mayor and 5 member City Council. Trussville contains 6 City parks, a municipal court, library, police, fire, street, and sanitation services, and is recognized nationally as a top Livable City. For 2017, Trussville will have an operating budget of \$38,609,690 with a general fund of \$28,814,900.

Trussville currently has approximately 37 miles of sidewalk. Existing pedestrian facilities are primarily concentrated in residential subdivisions, but some sidewalks connect points along collector streets. ***The purpose of this ADA Transition Plan is to ensure that these existing pedestrian facilities are accessible to all Trussville citizens in as timely and complete a manner as is reasonably possible.***

### 1.2 Americans with Disabilities Act (ADA)

The Americans with Disabilities Act (ADA), signed into federal law on July 26<sup>th</sup>, 1990, was created with the purpose of prohibiting discrimination and ensuring equal opportunity to those with disabilities in employment, State and local government services, public accommodations, commercial facilities, and transportation. Title II of the ADA specifically applies to any State or local government and its departments, agencies, or other branches or divisions, and protects the disabled from discrimination due to disability in services or activities provided by State and local government entities. Title II specifically states that “No qualified individual with a disability shall, on the basis of disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity.” (28 CFR 35.130(a))

All public entities employing 50 or more people are required by ADA law to develop a transition plan. According to 28 CFR 35.150(d)(3), the transition plan shall—

- (i) Identify physical obstacles in the public entity’s facilities that limit the accessibility of its programs, activities, or facilities to individuals with disabilities;
- (ii) Describe in detail the methods that will be used to make the facilities accessible;
- (iii) Specify the schedule for taking the steps necessary to achieve compliance with this section and, if the time period of the transition plan is longer than one year, identify steps that will be taken during each year of the transition period; and
- (iv) Indicate the official responsible for implementation of the plan.

This transition plan will identify and address issues within the public right-of-way that are not compliant with current ADA standards. A separate document will address city buildings and facilities.

Current ADA standards are detailed in 2 separate documents. The 2010 ADA Standards for Accessible Design (ADAAG) gives definitions, standards, and minimum criteria which must be satisfied in order for facilities and infrastructure to be accessible. These standards are most applicable for buildings, but do not include thorough guidelines which are applicable to sidewalk and other pedestrian facilities. The proposed Public Right of Way Accessibility Guidelines (PROWAG), released in 2011, specifically address sidewalks and other facilities within public right-of-way and will be most relevant to the items inventoried as a part of this transition plan.

Recent projects by the City to improve ADA compliance include removing trip hazards from sidewalk on Chalkville Road and building ramps to improve access to City Hall.

## **2.0 ADA Coordinator & Public Involvement Process**

### **2.1 ADA Coordinator**

The City of Trussville official who will serve as the City's ADA Coordinator will be the Superintendent of Engineering & Inspections, David Arnett. In preparation for the role as ADA Coordinator, Mr. Arnett attended a 1-day ADA Coordinator Training session in May of 2016, hosted by the Birmingham Area Metropolitan Planning Organization. Inquiries, comments, or concerns can be directed to him at:

David Arnett  
Superintendent of Engineering & Inspections  
131 Main Street, Trussville, Alabama 35173  
(205) 655-5483, darnett@trussville.org

The ADA Coordinator will be responsible for implementing and updating the City's Transition Plan as needed. Revisions to the plan are anticipated as additional inventory of barriers is completed in the future, as well as to address comments received from the public in the future. The current plan will be kept on file by Mr. Arnett and will also be available on the Public Works page of the City website. The ADA coordinator will also provide a briefing to the city council every 2 years on plan progress and any proposed revisions.

## 2.2 Public Involvement Process

In compliance with the Code of Federal Regulations, public comments were solicited as part of the development of this plan in order to provide an opportunity for interested persons to participate in the City's approach to removing ADA barriers. The draft version of the plan was presented during the June 27, 2017 city council meeting. In addition, the draft was posted at the usual locations for city announcements and ordinances for 3 weeks: City Hall, City Library, and the Civic Center. An article was written in the Trussville Tribune on June 27, 2017 about the draft document and directed people to the online version that was posted on the city's website for comments. Public feedback was sought on the City's approach to identifying and removing existing barriers. A log of public comments received is presented in Appendix D:

Grievances and comments related to accessibility should follow the process outlined in the City's Disability Discrimination Grievance Procedure which is given in Appendix A of this plan.

## 3.0 Summary of Physical Obstacles

### 3.1 Approach to Inventory Collection and Analysis

The City elected to take a complete inventory of all pedestrian elements within the City, as opposed to doing a phased inventory. This will allow the city to have a better total cost estimate to make upgrades for the entire city. During the months of February and March of 2017, inventory of approximately 37 miles of existing sidewalk and associated pedestrian facilities was performed within the City. Field data was taken on these pedestrian elements:

- Sidewalks
- Curb Ramp
- Cross Walks
- On Street Parking
- Pedestrian Signals

Another common feature is the pedestrian refuge island, but none were found within Trussville.

### 3.2 Summary of Obstacles

The purpose of the inventory was to record and assess the condition of the pedestrian elements in order to check for compliance with all applicable ADA guidelines. Utilizing GPS mapping and standard measuring devices, each pedestrian element was checked for compliance. Characteristics which were checked include the following:

- Sidewalk cross slopes, widths, and running slopes
- Gaps and protrusions along sidewalks and curb ramps
- Turning widths and lengths necessary for accessible landings at crossings
- Presence and quality of detectable warning surfaces at road crossings
- Widths and slopes of existing on-street parking

In each of the elements inventoried below, if any one of the characteristics evaluated for an individual element did not satisfy current regulations, the entire element has been categorized as non-compliant. The following is a summary of the items which were inventoried. Elements are grouped by type (sidewalks, curb ramps, cross walks, on-street parking, and pedestrian signals) and by compliance or non-compliance with current ADA law.

### 3.2.1 Sidewalks

A total of 37 miles of sidewalk within the City of Trussville were inventoried and checked for compliance. Most of the sidewalk segments had at least one deficiency in either cross slopes, deterioration of the sidewalk, lateral protrusions, discontinuities, or narrow widths. The deficiencies found during inventory may have occurred due to any of the following reasons: initial construction was completed prior to development of current ADA requirements, improper initial construction, soil settlement occurred beneath sidewalk, growth of tree roots, or a number of other changes that may have taken place over time.

The sidewalk areas below were calculated by multiplying segment lengths by their respective widths and totaling those areas together. The area calculated may be an approximation due to non-uniform shapes and widths of the segments.

SIDEWALKS	COMPLIANT	NON-COMPLIANT
<i>Length (Feet)</i>	14,282	181,050
<i>Length (Miles)</i>	2.71	34.29
<i>Area (Square Feet)</i>	67,053	676,904
<i>Area (Square Yards)</i>	7,450	75,212

Appendix B of this report includes maps of the various pedestrian elements inventoried within each geographical area. Sidewalks shown in green on the maps are compliant, while non-compliant sidewalk sections are shown in red, orange, or yellow. Examples of both compliant and non-compliant sidewalks within the City are shown in Figures 1 and 2 below.



**Figure 1: 630 Lake Ridge Dr  
Compliant Sidewalk**



**Figure 2: 3617 Merlin Cir  
Non-Compliant Sidewalk  
Due to 3' Width, Vertical Discontinuity,  
and Lateral Protrusion from Shrubs**

### 3.2.2 Curb Ramps

During the inventory, a total of 174 curb ramps were reviewed. Each ramp was meticulously checked for compliance with ADA law, which included checking for applicable slope restrictions, presence of required level turning areas, and detectable warning surfaces. Of the curb ramps which were inventoried, most had at least one deficiency.

CURB RAMPS	COMPLIANT	NON-COMPLIANT
<i>Parallel Ramps</i>	3	125
<i>Blended Transitions*</i>	0	17
<i>Perpendicular Ramps</i>	4	25
<b>TOTAL</b>	<b>7</b>	<b>167</b>

\* Blended Transitions are where pedestrian road crossings have the same elevation as the adjacent sidewalk grade, rather than requiring a typical curb ramp for the pedestrian to reach the lower grade of the road

Reference Appendix B of this report for maps of the various pedestrian elements inventoried within each geographical area. Examples of both compliant and non-compliant curb ramps within the City are shown in Figures 3 and 4.



**Figure 3: Gadsden Hwy at Tutwiler Dr  
Compliant Curb Ramp**



**Figure 4: Ellie Lane  
Non-Compliant Curb Ramp  
Due to Slope, Grade Change at Gutter,  
And Lack of Detectable Warning Surface**

**3.2.3 Cross Walks**

A total of 17 cross walks were inventoried for the City’s Transition Plan. Most of the non-compliant cross walks were due to excessive cross slopes, while other reasons for non-compliance included significant deterioration of pavement or the presence of a non-traversable inlet grate in the cross walk.

For instances in which the cross walk striping had begun to fade, the inventory team listed those cross walks as non-compliant. ADA guidelines do not provide guidance on the striping of cross walks, but current guidance provided by the 2009 edition of the Manual on Uniform Traffic Control Devices (MUTCD) provides that these markings be re-striped in order to meet MUTCD standards.

CROSS WALKS	COMPLIANT	NON-COMPLIANT
TOTAL	7	10

Appendix B of this report includes maps of the various pedestrian elements inventoried within each geographical area. Examples of both compliant and non-compliant cross walks within the City are shown in Figures 5 and 6.



**Figure 5: Husky Pkwy at Recreation Center Dr  
Compliant Cross Walk**



**Figure 6: Gadsden Hwy Crossing Chalkville Rd  
Non-Compliant Cross Walk  
Due to Cross Slope and Striping**

**3.2.4 On-Street Parking**

A minimum number of accessible spaces should be provided at each location according to Section 208.2 of ADAAG. For each parking area, Section 208.2.4 requires there be at least one parking space that is van accessible. Typical issues to watch for on parking areas include van accessible and ADA spaces, appropriate signage, access aisles width, presence of obstructions, and slopes in excess of 2%. There was one location discovered during the inventory that had on street parking in the Trussville Springs subdivision. This subdivision was still under construction and therefore the final pavement and striping of parking spaces had not been completed. There was however a signed handicap parking space with ramp access near the community club house.

ON-STREET PARKING	COMPLIANT	NON-COMPLIANT
TOTAL AREAS	1	0

An example of the on street parking is given below in Figure 7.



**Figure 7: Trussville Springs at Cahaba Bend  
Compliant On-Street Parking**

### 3.2.5 Pedestrian Signals

During this initial inventory, 7 pedestrian signals were checked for compliance to ADA law. Each pedestrian signal was checked for mounting height, horizontal reach, and distance from the curb or pavement. Of the pedestrian signals inventoried, most had at least one deficiency, with the most common deficiency being that the pedestrian signal was at a non-compliant distance from the curb or pavement.

PEDESTRIAN SIGNALS	COMPLIANT	NON-COMPLIANT
TOTAL	2	5

Reference Appendix B of this report for maps of the various pedestrian elements inventoried within each geographical area. Examples of both compliant and non-compliant pedestrian signals found within the City are shown in Figures 8 and 9.



**Figure 8: Husky Pkwy at Stadium  
Compliant Pedestrian Signal**



**Figure 9: Gadsden Hwy at Tutwiler Dr  
Non-Compliant Pedestrian Signal  
Due to Excessive Horizontal Reach  
and Excessive Distance from Curb / Pavement**

### 3.2.6 Refuge Islands

No pedestrian refuge islands were found within the city.

## 4.0 Strategy for Upgrades

### 4.1 Prioritization

Initial inventory areas were selected to capture geographical locations where pedestrian facilities receive the heaviest use. In order to determine which barriers need to be prioritized in future improvements, the severity of each existing compliance barrier was reviewed and recorded as a part of this inventory. Other factors that will also be used to determine prioritization will include public feedback received in response to this plan and grievances filed by the public in accordance with the City's official grievance procedures (Appendix A of this plan).

### 4.2 Approximate Construction Costs for Removal of Barriers

The following tables summarize the costs of improvements which would be necessary to bring all existing barriers into compliance. Costs are separated by different types of pedestrian elements in Table 1 below. Costs associated with project design and right-of-way or easement acquisition are not included in the estimates below.

<b>TABLE 1: CONSTRUCTION COSTS BY ELEMENT TYPE</b>			
PEDESTRIAN ELEMENT	NON-COMPLIANT UNITS	COST PER UNIT	COST
<i>Sidewalks</i>	<i>75,212 SY</i>	<i>\$100 Per SY</i>	<i>\$ 7,521,160</i>
<i>Curb Ramps</i>	<i>167 Each</i>	<i>\$750 Each</i>	<i>\$ 125,250</i>
<i>Cross Walks</i>	<i>10 Each</i>	<i>\$13,000 Each</i>	<i>\$ 130,000</i>
<i>On Street Parking</i>	<i>0 Each</i>	<i>\$4,000 Each</i>	<i>\$ 0</i>
<i>Pedestrian Signals</i>	<i>5 Each</i>	<i>\$3,000 Each</i>	<i>\$ 15,000</i>
<i>Refuge Islands</i>	<i>0 Each</i>	<i>\$2,000 Each</i>	<i>\$ 0</i>
<b>TOTAL COST =</b>			<b>\$ 7,791,410</b>

Each existing barrier was evaluated based on the severity of the condition which resulted in non-compliance. Barriers were assigned a rating of high, medium, or low depending on the condition. A high severity issue would be an obvious accessibility issue to untrained personnel. A medium would be an issue apparent to those with ADA training. A low severity would require measurement to confirm if it was out of compliance. The table below summarizes the approximate construction costs of improvements based on these different ratings. Costs associated with project design and right-of-way or easement acquisition are not included in the estimates below.

<b>TABLE 2: CONSTRUCTION COSTS BY SEVERITY RATING</b>			
PEDESTRIAN ELEMENT	HIGH	MEDIUM	LOW
<i>Sidewalks</i>	<i>\$ 50,022</i>	<i>\$ 974,741</i>	<i>\$ 6,496,397</i>
<i>Curb Ramps</i>	<i>\$ 2,250</i>	<i>\$ 111,750</i>	<i>\$ 11,250</i>
<i>Cross Walks</i>	<i>\$ 0</i>	<i>\$ 39,000</i>	<i>\$ 91,000</i>
<i>On-Street Parking</i>	<i>\$ 0</i>	<i>\$ 0</i>	<i>\$ 0</i>
<i>Pedestrian Signals</i>	<i>\$ 0</i>	<i>\$ 0</i>	<i>\$ 15,000</i>
<i>Refuge Islands</i>	<i>\$ 0</i>	<i>\$ 0</i>	<i>\$ 0</i>
<b>TOTAL COSTS =</b>	<b>\$ 52,272</b>	<b>\$ 1,125,491</b>	<b>\$ 6,613,647</b>

## 5.0 Schedule for Steps to Compliance

### 5.1 Existing Obstacle Removal

The City of Trussville has placed a first priority on removing the high and medium severity barriers. From table 2 this would be approximately \$1.18M. At this time the City finds it reasonable to budget approximately \$100,000 per year for ADA upgrades, so a 12 year plan is expected to address the high and medium severity issues. This schedule is based on the City's current revenue, and may be revised if necessary in the future to address changes in revenue or changes in prioritization of barriers to be removed.

Based on the prioritization of barriers completed in Section 4.1, above, initial efforts will target the removal of high severity barriers throughout the City. The City may also determine that the removal of some medium and low priority barriers should be accomplished concurrently with nearby high priority barriers, due to proximity and cost effectiveness. Upon addressing high priority barriers, medium and low priority barriers will be addressed in subsequent years.

Removal of barriers will be accomplished by City crews in cases where minor, low-cost improvements can be made to remove barriers. These cases would include removal of vegetation and manmade obstructions, installation of detectable warning surfaces on ramps, and removal and replacement of short, severely cracked sidewalk segments. In other cases, the City would require assistance in the design and construction of more substantial improvements in locations where significant compliance barriers exist. When possible, projects to remove existing barriers will be coordinated and combined with other proposed improvement projects which necessitate construction within public right-of-way.

Priority will also be given to reviewing public comments and complaints received through the City's grievance procedure included in Appendix A of this report. In situations where these cases are determined to be urgent, the City will remove these barriers immediately, if possible, or will place the proposed improvement at the top of its project priority list. In other situations where these cases reveal a non-urgent need for the removal of barriers, the City will assign a severity level to each case and the barriers will be added to the list of future improvements to be made.

### 5.2 Requirements for New Construction and Alterations

This transition plan will be subject to new findings in coming years. Existing infrastructure will age and may change from compliant to non-compliant. New construction will continue to add pedestrian elements to the City. A review of the subdivision regulations was done in order to determine if sufficient language is included to make sure developers are required to build to the current ADA guidelines.

The current subdivision regulations were adopted in 1978. It is noted that the first ADA bill was passed in 1990. Therefore many of the concepts of ADA are not addressed in the subdivision regulations. Section VI.1.2 states that sidewalk should be a minimum 4' width in residential areas. This will meet ADA if a 5' wide passing zone is provided for every 200'. This can typically be accomplished at driveways, but a passing zone should be noted as required if 4' sidewalks are used. This section also states that sidewalks shall be constructed according to City Specifications, however such specifications were not found.

It is not recommended to insert the ADA guidelines directly into the subdivision regulations since the guidelines do change over the long term. Instead a generic note should be added that states all development within the City shall be in accordance with ADA guidelines.