

# TOWN OF LAGRANGE, INDIANA

## Americans with Disabilities Act Self-Evaluation and Transition Plan



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## List of Abbreviations/Acronyms

AA – Affirmative Action  
AASHTO – American Association of State Highway and Transportation Officials  
ABA – Architectural Barriers Act of 1968  
ADA – Americans with Disabilities Act of 1990  
ADAAG – Americans with Disabilities Act Accessibility Guidelines  
CDBG – Community Development Block Grant  
CEMP – Comprehensive Emergency Management Plan  
CFR – Code of Federal Regulations  
D.A.R.E. – Drug Abuse Resistance Education  
DDRS – Indiana Division of Disability & Rehabilitative Services  
DHHS – Deaf & Hard of Hearing Services, Indiana Division of Disability & Rehabilitative Services  
DOJ – U.S. Department of Justice  
DOT – U.S. Department of Transportation  
EEOC – Equal Employment Opportunity Commission  
EMS – Emergency Medical Services  
FHWA – U.S. DOT Federal Highway Administration  
FTA – U.S. DOT Federal Transit Administration  
G.E.D. – General Educational Development  
GIS – Geographic Information System  
HOME – Home Investment Partnership  
HR – Human Resources Department  
HTML - Hyper Text Markup Language  
INDOT – Indiana Department of Transportation  
ISA – International Symbol of Accessibility  
IT – Information Technology Department  
NCA – National Center on Accessibility  
OTRB – Over-the-Road Buses  
PDF – Portable Document Format  
PROWAG – Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way  
RA – Rehabilitation Act of 1973  
ROW – Right-of-Way  
RTF – Rich Text Format  
SETP – Self-Evaluation and Transition Plan  
TDD – Telecommunications Devices for Deaf Persons  
TRS – Telecommunications Relay Service  
TTY – Teletypewriter  
UFAS – Uniform Federal Accessibility Standards

## Executive Summary

The Americans with Disabilities Act (ADA) is a comprehensive Federal civil rights statute enacted in 1990. Comprised of five major parts, or “titles”, the ADA’s stated purpose was to provide a “clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities”. It is estimated by the U.S. Census Bureau that over 50 million U.S. residents have a disability, and over 50% of senior citizens age 65 or older have a disability. Title II requires that all public entities with 50 or more employees perform a self-evaluation, prepare a transition plan, make the transition plan available for three (3) years, publish a notice of non-discrimination, designate an ADA Coordinator, and develop a formal complaint form and grievance procedure.

The Town of LaGrange has completed this self-evaluation of all Town facilities, including the public right-of-way (ROW), programs, and procedures and prepared a Transition Plan that outlines the necessary steps to be fully compliant with the requirements of Title II of the ADA. The Town will strive to ensure that all residents and visitors are able to access all services, programs and activities and will promptly investigate any formal grievance filed according to the grievance procedures outlined. Additionally, the Town will endeavor to include annual budgetary allotments to make required improvements that will eventually make the various facilities fully accessible, with emphasis given to the improvements that most impact the ability of persons with disabilities to access facilities or programs. Where access cannot be provided, alternate means to provide the same opportunities to persons with disabilities will be provided.

In performing this self-evaluation, only areas open to the public were assessed at the following Town facilities identified by the Town of LaGrange as having programs/services provided:

- Town Hall
- Fire Station
- Police Station
- Greenwood Cemetery
- LaGrange Town Park
- Public Parking Lot at intersection of  
Michigan and Poplar
- Town-owned Right-Of-Way

Areas of these facilities open to the public generally included parking lots, walks, and areas within buildings that are not restricted to employees. The decision to exclude areas of Town facilities, or entire facilities, restricted to employees does not obviate the need of the Town to ensure full accessibility is provided to employees with disabilities, consistent with the requirements of Title I of the ADA.

In addition to Town facilities, the self-evaluation reviewed existing Town policies and procedures within each department. The focus of this review began with distribution of a questionnaire to each department, followed by interviews or other data gathering if needed to better understand the responses or the operation of each department. Key items reviewed within each department included ADA-specific training of employees, past interaction and accommodation of persons with

disabilities, review of publications produced by each department, and staff suggestions to help them better accommodate persons with disabilities. Following this review, recommendations were made to improve accessibility of programs for each department.

It is the goal of the Town to make facilities for all services, programs and activities fully accessible within 10 years, and allocate on-going funding to improvements of their Right-Of-Way facilities. However, completion of these goals will be largely dependent on a number of economic factors and future changes to the ADA Accessibility Guidelines (ADAAG) or other unforeseen requirements that would necessitate additional improvements to Town facilities. The Town has committed to provide training for staff on the requirements of the ADA and make accommodations for employees with disabilities, many of which can be done without costly architectural renovations. The Transition Plan will be reviewed and updated periodically to ensure the Town is fully compliant with the applicable standards.

The results of the self-evaluation assessment identified a number of barriers at Town facilities and public right-of-way. The total estimated cost to correct these deficiencies is \$1,663,188. The degree to which these barriers have limited accessibility and their priority for corrective action was subjectively categorized as “high”, “medium”, or “low”. “High” priority included barriers that effectively prohibited access to a service or program or present a safety hazard. “Medium” priority included barriers that either partially prohibited access or made it quite difficult. “Low” priority barriers typically do not limit access but are not compliant with standards. The actual implementation schedule, budgeting, and prioritization is up to the administration and is likely to be impacted by future barrier assessments, complaints, new regulations and requirements, and availability of funding. Note that these costs are to resolve accessibility issues by making architectural improvements and in many instances there are procedural or other modifications that can be made to provide equal access to Town programs and some modifications are not required until renovations are constructed. These modifications are noted within this report.

## 1.0 Introduction and Overview

### 1.1 Introduction

The [Americans with Disabilities Act of 1990](#) (ADA), enacted on July 26, 1990, is a Federal civil rights statute, under the jurisdiction of the United States Department of Justice (DOJ), which provides civil rights protection to qualified individuals with disabilities in the areas of employment, public accommodations, state and local government services, transportation, and telecommunications. The law states its purpose is “to provide a clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities”. Similar protections are provided by Section 504 of the Rehabilitation Act of 1973. The ADA was signed into law by President George Bush on July 26, 1990, extending civil rights protections to individuals with physical or mental disabilities in the following areas:

1. **Title I** – Employment (all Title II employers and employers with 15 or more employees)
2. **Title II** – Public Services (state and local government including public school districts and public transportation)
3. **Title III** – Public Accommodations and Services operated by Private Entities
4. **Title IV** – Telecommunications
5. **Title V** – Miscellaneous

The Town of LaGrange is located in LaGrange County in west-central Indiana. The population was estimated at 2,625 in 2011. The Town of LaGrange is classified as a “public entity” pursuant to Title II of the ADA. The Town is also required to comply with Title I, which requires state and local government entities to practice nondiscrimination in all parts of the employment process.

The DOJ is the lead agency that oversees the ADA. The ADA in itself is not enforceable by any state or local governmental unit code official.

### 1.2 Purpose

The Code of Federal Regulations (CFR) is the codification of the general and permanent rules published in the Federal Register by the executive departments and agencies of the Federal government. It is divided into 50 titles that represent broad areas subject to Federal regulation. Each volume of the CFR is updated once each calendar year and is issued on a quarterly basis.

Relative to the ADA on July 26, 1990, the DOJ issued rules implementing Title II, which is codified at [28 CFR Part 35](#), which applies to the Town of LaGrange. Title II requires state and local governments to make their programs and services accessible to persons with disabilities. This requirement extends not only to physical access at government facilities, programs, and events, but also to policy changes that state and local governmental entities must make to ensure that all people with disabilities can take part in, and benefit from, the programs and services of state and local governments.

The ADA regulations [ref. U.S. DOJ, [28 CFR Part 35, Subpart A, 35.105 and 35.150\(a\) and \(d\)](#)] require state and local governments to conduct a self-evaluation of their programs and services to identify barriers to access. One of the fundamental reasons for performing the self-evaluation is to identify potential problems before they occur, so that discrimination complaints won't be necessary. By identifying the policies, programs, services, and activities that do not comply, the Town can take action to remove those barriers to ensure that the Town is not discriminating against individuals with disabilities. Title II of the ADA stipulates that the Town is required to perform six administrative responsibilities:

1. Publicize the name and contact information of the designated ADA Coordinator responsible to oversee compliance [[28 CFR 35.107 \(a\)](#)]

2. Administer and write a self-evaluation of the programmatic barriers in services offered by the local government and provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the self-evaluation process by submitting comments [\[28 CFR 35.105\]](#)
3. Publicize and inform applicants, participants, and beneficiaries of the Town's policy of nondiscrimination on the basis of disability related to Town services, programs, and activities [\[28 CFR 35.106\]](#)
4. Establish a complaint/grievance procedure to respond to complaints of noncompliance from the public [\[28 CFR 35.107 \(b\)\]](#)
5. Develop a transition plan if structural changes are necessary for achieving program accessibility [\[28 CFR 35.150 \(a\) and \(d\)\]](#)
6. Retain the self-evaluation and provide it for public inspection for three years [\[28 CFR 35.105 \(c\)\]](#)

The Town of LaGrange is committed to complying with the tenets of Title II of the ADA of 1990, and other Federal and state statutes and regulations intended to make Town-owned and operated facilities, programs, services, and activities accessible to persons with disabilities. This ADA Self-Evaluation and Transition Plan (SETP) establishes a new benchmark for compliance with ADA and identifies a plan to remove barriers.

### **1.3 Transition Plan Overview**

In 2012, the Town of LaGrange was made aware of the requirements of the ADA by the Federal Highway Administration (FHWA) and Indiana Department of Transportation (INDOT), who made several presentations throughout the state on the topic. The Town did not have a SETP in place that included an evaluation of all Town facilities, programs, policies, services, and activities. The Town responded by contracting DLZ Indiana, LLC to assist in preparing a SETP.

A work plan to assess Town-owned and operated facilities, programs, policies, services,

and activities for compliance with the ADA was initiated to complete the ADA SETP. This work plan included:

- Facility audit (interior and exterior)
- Self-evaluation of Town programs, services and activities
- Facilitate designating an ADA Coordinator
- Develop grievance procedures
- Outreach to advocacy groups and the general public
- Prioritize facilities improvements for accessibility
- Develop written transition plan
- Adoption of the transition plan

Facility audits were performed only in those areas open to the public for this project. The Town also performed an accessibility audit of pedestrian facilities located in the Town right-of-way. The purpose of auditing pedestrian facilities in the public right-of-way was to identify physical obstacles limiting the accessibility of Town programs, services and activities to individuals with disabilities.

Areas within Town-owned facilities that are not accessible to the public must also be accessible for employees with disabilities as a requirement of Title I. Accessibility in employee work areas will be assessed on a case-by-case basis based on the needs of the individual and nature of their disability. The Town is committed to ensuring that all workspaces are accessible pursuant to the requirements of each job and making the necessary modifications when needed.

A public involvement process was incorporated to assist in the development of this SETP. These recommendations are intended to serve as the transition plan and framework for implementation. All of the recommendations in this plan for structural or programmatic solutions to facilitate the opportunity for access to all individuals are subject to review, revision, and approval of the Town Council and appropriation of funding to implement the improvements.



This transition plan is an on-going, dynamic document that will need periodic review and updating. In particular, additional evaluations will be required when updates are made to the ADA or supporting statutes or when existing accessibility guidelines change or new guidelines are established. In its efforts to maintain compliance, the Town has several mechanisms in place to provide for an ongoing update of the transition plan:

- Designated ADA Coordinator is empowered with oversight responsibility for implementation of the requirements of the ADA.
- Implementation activities will be part of the Town's annual Capital Improvement Plan.
- Training of staff.

#### **1.4 Legislative Background & Framework**

For more than forty (40) years, the Town of LaGrange has been subject to many of the non-discrimination provisions contained in the ADA. Significant precursory legislation to the ADA includes the [Architectural Barriers Act of 1968](#) (ABA) and [Section 504 of the Rehabilitation Act of 1973](#) (RA).

Congress' first significant effort to address discrimination on the basis of disability was its enactment of the ABA, which provided that all buildings constructed, altered, leased, or financed by the U.S. Government shall be accessible to, and usable by, individuals with physical disabilities.

Section 504 of the Rehabilitation Act states: *"No otherwise qualified individual with a disability in the United States shall, solely by reason of his disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance or under any program or activity conducted by any Executive Agency"*. It also requires Federal agencies to provide accessible programs and facilities.

The ADA was modeled on Section 504. The ADA applies to state and local government entities, public accommodations, public transportation, and commercial establishments. The key points of understanding for ADA are:

- The ADA is fundamentally civil rights legislation. This legislation protects the rights of people with disabilities in employment, transportation, public accommodation, and access to services offered by the public.
- The ADA addresses facility access and access to programs and services. Buildings are required to be accessible and the activities that are offered inside and outside those buildings also must be accessible.
- Outdoor recreation standards as they relate to ADA for a variety of facilities were included in the 2010 ADA Standards for Accessible Design (ADAAG). Standards for amusement rides, boating and fishing facilities, exercise machines and equipment, golf and miniature golf facilities, play areas, and swimming/wading pools and spas went into effect on March 15, 2012 for all new or altered facilities.

The primary focus of this report is to assess the compliance of the Town of LaGrange's facilities, programs, policies, services, and activities related to Title II of the ADA. Title II of the ADA was effective on January 26, 1992.

Governmental entities must ensure effective communication, including the provision of necessary auxiliary aids and services, so that individuals with disabilities can participate in civic functions. Public entities are not required to take actions that would result in undue financial and administrative burdens. However, they are required to make reasonable modifications to policies, practices, and procedures where necessary to avoid discrimination, unless they can demonstrate that doing so would fundamentally alter the nature of the service, program, or activity being provided.

One important way to ensure that Title II's requirements are being met in cities of all sizes



is through self-evaluation, which is required by the ADA regulations. Self-evaluation enables local governments to pinpoint the facilities, programs and services that must be modified or relocated to ensure that local governments are complying with Title II requirements of the ADA. A public entity that employs fifty (50) or more employees must retain its self-evaluation for a minimum of three (3) years.

### **1.5 Facility Access versus Program Access**

The ADA addresses two types of accessibility:

- Facility accessibility
- Program accessibility

Facility accessibility requires that a building or structure be physically accessible. Individuals with disabilities cannot be provided access to programs, services, and activities if a building is inaccessible. Program accessibility includes facility accessibility, but also means that a person with a qualified disability receives the same benefits from a program or service and has an equal opportunity to participate as any other participant. The ADA requires all Town programs, but not all Town buildings, to be accessible.

There is some flexibility with regard to program accessibility. Not every building (or each part of every building) needs to be accessible. Structural modifications are required only when there is no alternative available for providing program access. The Town is required to provide program access, which means that programs, services and activities when viewed in their entirety, are readily accessible to and usable by individuals with disabilities.

When choosing a method of providing program access, the Town will give priority to the one that results in the most integrated setting appropriate to encourage interaction among all users, including individuals with disabilities. In accordance with Title II program accessibility requirements, the Town is required to:

- Provide equal access to programs, services, and activities as provided to other members of the community. [\[28 CFR 35.130\(a\)-\(b\)\(1\)\(vii\)\]](#)
- Provide programs, services and activities in an integrated setting, unless separate or different measures are necessary to ensure equal opportunity. [\[28 CFR 35.130\(b\)\(2\)\(d\)\]](#)
- Absorb any costs necessary to ensure nondiscriminatory treatment, such as making modifications required to provide program accessibility or providing qualified interpreters. [\[28 CFR 35.130\(f\)\]](#)
- Allow a person with a disability to participate in a program, service or activity regardless of disability. [\[28 CFR 35.130\(g\)\]](#)
- Eliminate unnecessary eligibility standards or rules that deny individuals with disabilities an equal opportunity to enjoy programs, services or activities unless necessary for the provisions of the program, service or activity. [\[28 CFR 35.130\(b\)\(8\)\]](#)
- Modify policies, practices, or procedures that deny equal access to individuals with disabilities [\[28 CFR 35.130\(b\)\(7\)\]](#)
- Furnish auxiliary aids and services when necessary to ensure effective communication. [\[28 CFR 35.160\(b\)\(1\)-\(2\)\]](#)
- Provide appropriate signage and structural communication to inform and alert individuals with visual, mobility, and hearing disabilities. [\[28 CFR 35.163\]](#)
- Eliminate physical barriers to programs, services, and activities by remodeling existing facilities, constructing new facilities, or moving programs, services or activities to an accessible location. [\[28 CFR 35.150\(b\)\(1\)\]](#)
- Ensure that newly constructed or altered buildings and facilities are free of physical and communication barriers that restrict accessibility of people with disabilities. [\[28 CFR 35.151\]](#)

### **1.6 Undue Burden**

The Town does not have to take any action that it can demonstrate would result in a fundamental alteration in the nature of a program or activity, would create a hazardous

condition for other people, or would represent an undue financial and administrative burden. A fundamental alteration is a change to such a degree that the original program, service, or activity is no longer the same. For example, a Town sponsors college-level classes that may be used toward a college degree. To be eligible to enroll, an individual must have either a high school diploma or a General Educational Development certificate ("G.E.D."). If someone lacks a diploma or G.E.D. because of a cognitive disability, it is unlikely that the Town would have to alter the requirement to provide equal access. Modifying the rule would change the class from college level to something less than college level and would fundamentally alter the original nature of the class.

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

### **1.7 ADA Self-Evaluation and Transition Plan Requirements**

The purpose of this ADA SETP is to document the Town's review of access to facilities, programs, services, and activities by individuals with disabilities in order to determine if there are any discriminatory or potentially discriminatory practices, policies, or procedures.

In accordance with the Title II requirements for self-evaluation, the Town:

- 1) Identified all of the public entity's programs, activities, and services. [\[28 CFR 35.105\(a\)\]](#)
- 2) Reviewed all the policies and practices that govern the administration of the Town's programs, activities, and services. [\[28 CFR 35.105\(a\)\]](#)

If structural changes are identified to provide program accessibility as part of the self-evaluation, the ADA identifies specific elements

to be included in the transition plan. At a minimum, the elements of the transition plan are:

- 1) A list of the physical barriers in the Town's facilities that limit the accessibility of its programs, activities, or services to individuals with disabilities. [\[28 CFR 35.150 \(d\)\(3\)\(i\)\]](#)
- 2) A detailed outline of the methods to be utilized to remove these barriers and make the facilities accessible. [\[28 CFR 35.150 \(d\)\(3\)\(ii\)\]](#)
- 3) The schedule for taking the necessary steps to achieve compliance with Title II of the ADA. If the time period for achieving compliance is longer than one year, the plan should identify the interim steps that will be taken during each year of the transition period. [\[28 CFR 35.150 \(d\)\(3\)\(iii\)\]](#)
- 4) The name of the official responsible for the plan's implementation. [\[28 CFR 35.150 \(d\)\(3\)\(iv\)\]](#)

### **1.8 Self-Evaluation and Transition Plan Process**

A work plan and method to assess Town-owned and operated facilities, programs, policies, services, and activities for compliance with the ADA was implemented to complete the ADA SETP. This work plan included:

- Facility audits (interior and exterior)
- Self-evaluation of Town programs, services and activities
- Public outreach to advocacy groups
- Facilitate designating an ADA Coordinator
- Develop grievance procedures
- Identify required/suggested training for Town staff
- Prioritize improvements to facilities for accessibility
- Develop transition plan
- Public involvement
- Adoption

Recommendations are intended to serve as the transition plan and framework for implementation. All of the recommendations in this plan for structural or programmatic

solutions to facilitate the opportunity of access to all individuals are subject to review, revision, and approval of the Town Common Council.

### **1.9 Facility Audit**

In the spring of 2013, accessibility audits of pedestrian facilities in the Town ROW, building and facility interiors, exterior site features at each were performed only in those areas open to the public. This review identified physical and architectural barriers and provided recommendations to comply with Federal accessibility requirements. The list of facilities that received an accessibility audit included:

- Town Hall
- Fire Station
- Police Station
- Greenwood Cemetery
- LaGrange Town Park
- Public Parking Lot at intersection of Michigan and Poplar
- Town-owned Right-Of-Way

Photographs of architectural and site conditions at the time of the inspection for all building amenities were taken for the record. The specific site and architectural improvements recommended to remove barriers and improve accessibility are listed in *Appendix A-Town of LaGrange, Facilities Report* and *Appendix B-Town of LaGrange, ROW Reports*.

### **1.10 Town Administration and Departments**

The Town of LaGrange is located in LaGrange County in Northwest Indiana and is the county seat of LaGrange County. The Town of LaGrange is governed by a five member Town Council. The council carries out a variety of functions, such as adopting the town's budget and ordinances, approving contracts and agreements and establishing the strategic plan and policies that guide the town government.

Council members represent their constituents' interests before the town government. Council posts are non-partisan.

There are five main departments that provide Town services, programs, and activities. These Departments and descriptions of their functions are:

#### **Town Clerk-Treasurer's Office**

The Clerk-Treasurer's Office staff is responsible for Town record keeping and finances. Major duties include responsibility for all revenue and expenditures and all of the resulting accounting and reporting required. In addition, the Clerk-Treasurer's Office performs a wide variety of functions including compiling the annual budget, compile and keep Town Cemetery records, and assist in development of Council agendas. The Clerk-Treasurer's Office also handles Human Resources tasks for the Town, including but not limited to payroll, federal tax payments, and maintaining employee records.

Public services offered include accepting payment of ordinance violation notices, providing forms for voter registration conducted through the County, and serving as a contact point for the Town Council and other Town departments. The Town Clerk-Treasurer's Office is located in Town Hall at 1201 N. Townline in LaGrange.

#### **Fire Department**

This all-volunteer department includes 28 members who respond from a single central station. LaGrange Volunteer Fire Department (LVFD) provides Fire, Rescue and Medical First-Responder protection to 48 square miles including the Town of LaGrange and all of Clay and Bloomfield Townships. LVFD responds to 200 runs each year. EMS service is provided county-wide by LaGrange County EMS. It is also a community service organization whose role also extends from search and rescue to aiding in cleanup, and providing assistance to all that need it during disasters that threaten the community. The Fire Department is located at 1201 N. Townline in LaGrange.

### **Police Department**

LaGrange Police Department is established to provide a safe environment and high quality of life to the men, women, and children who live in, work in, visit or pass through LaGrange. The LPD is comprised of The Town Marshal, three Deputies, and 8 Personnel who serve as Reserves. The LPD is located at 1201 N. Townline in LaGrange.

### **Public Works Department**

The Public Works department includes the Town Park, the Greenwood Cemetery, and the Street Department.

Greenwood Cemetery is on the south end of town (Detroit St/SR9). The property for Greenwood Cemetery was donated by the Hamilton family with the option of more land as needed. This cemetery is owned and maintained by the Town of LaGrange.

The Town Park is located at the intersection of Steuben and Mountain Streets. No formal programs are provided, but the facility is used by the public extensively.

The Street Department maintains streets within Town limits, including repairs, deicing, and snow removal. In addition, the department runs programs such as the Spring Clean Up and issues permits for driveway cuts. This department is located at 402 Nursery Street. No public services are conducted at this facility.

### **Water and Wastewater Utilities**

Utilities offered through the Town of LaGrange include water and sewage. The Utility Billing office is located at Town Hall and handles invoices and payments as well as service and permit applications. Wastewater treatment plant is located at 402 Nursery Street. No public services are conducted at this facility.

## **1.11 Department Self-Evaluation**

As part of this self-evaluation, the Town distributed a questionnaire to all Town

departments requesting information about their respective departmental policies regarding ADA compliance. DLZ staff corresponded with the LaGrange ADA Coordinator to discuss the intended use of the questionnaire. All policies, programs, activities, and services were evaluated and in the case where policies are not currently in place, this report provides recommendations for the implementation of corrective actions to comply with the ADA. Refer to Section 3.18 Department Self-Evaluation - Findings & Recommendations.

## **1.12 Public Outreach**

Public outreach began by publishing a public notice to receive input on perceived barriers within the community and notify the public of the Town's commitment to meet the requirements of the ADA and introduce the project. Invitations for comment were also sent by U.S. mail to several disability advocacy groups in the area. Comments were received and can be found in *Appendix D – Public Outreach*.

When the draft SETP was made available for public review, it was placed at the following locations:

- 1) Clerk-Treasurer's Office (1201 N. Townline)
- 2) LaGrange County Public Library (branch at 1200 N. Detroit St.)

The report was made available for public review from August 26 2013 until September 9, 2013 [2 weeks]. After the draft SETP was available, a public meeting was held for review and comment on the draft ADA SETP on September 3, 2013. In addition, comments could be submitted until September 9, 2013 at Town Hall. No public comments were received.

In advance of the meeting, invitations to attend the meeting were sent by U.S. mail to several disability advocacy groups. The meeting was also advertised in the local newspaper at least seven days in advance.

Any future public comments received should be considered in future planning corrections for Town projects related to the removal of architectural and programmatic barriers at Town facilities.



## 2.0 Definitions

The words, phrases and definitions summarized below are included in the ADA. Refer to the ADA 28 CFR 35.104 for full definitions. A list of common terms and definitions are included below.

**2010 Standards:** the 2010 ADA Standards for Accessible Design (ADAAG), which consist of the 2004 ADAAG and requirements contained in 35.151.

**Access Board:** an independent Federal agency devoted to accessibility for people with disabilities. The [Access Board](#) developed the accessibility guidelines for the ADA and provides technical assistance and training on these guidelines.

**Accessible:** refers to a site, facility, work environment, service, or program that is easy to approach, enter, operate, participate in, and/or use safely and with dignity by a person with a disability.

**Affirmative Action (AA):** a set of positive steps that employers use to promote equal employment opportunity and to eliminate discrimination. It includes expanded outreach, recruitment, mentoring, training, management development and other programs designed to help employers hire, retain and advance qualified workers from diverse backgrounds, including persons with disabilities. Affirmative action means inclusion, not exclusion. Affirmative action does not mean quotas and is not mandated by the ADA.

**Alteration:** a change to a facility in the public right-of-way that affects or could affect pedestrian access, circulation, or use. Alterations include, but are not limited to, resurfacing, rehabilitation, reconstruction, historic restoration, or changes or rearrangement of structural parts or elements of a facility.

**Americans with Disabilities Act (ADA):** a comprehensive, Federal civil rights law that

prohibits discrimination against people with disabilities in employment, state and local government programs and activities, public accommodations, transportation, and telecommunications.

**ADA Accessibility Guidelines (ADAAG):** scoping and technical requirements 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 DOJ and the Department of Transportation (DOT).

**ADA Coordinator:** The ADA Coordinator is the individual who is responsible for implementing the ADA Self-Evaluation and Compliance in accordance with Title II of the Americans with Disabilities Act.

**Auxiliary Aids and Services:** under Titles II and III of the ADA, includes a wide range of services and devices that promote effective communication or allows access to goods and services. Examples of auxiliary aids and services for individuals who are deaf or hard of hearing include qualified interpreters, note takers, computer-aided transcription services, written materials, telephone handset amplifiers, assistive listening systems, telephones compatible with hearing aids, closed caption decoders, open and closed captioning, telecommunications devices for deaf persons (TDDs), videotext displays, and exchange of written notes. Examples for individuals with vision impairments include qualified readers, taped texts, audio recordings, Braille materials, large print materials, and assistance in locating items. Examples for individuals with speech impairments include TDDs, computer terminals, speech synthesizers, and communication boards.

**Blended Transition:** a raised pedestrian street crossing, depressed corner, or similar connection between the pedestrian access route at the level of the sidewalk and the level

of the pedestrian street crossing that has a grade of 5 percent or less.

**Civil Rights Act of 1991:** Federal law that capped compensatory and punitive damages under Title I of the ADA for intentional job discrimination. The law also amended the ADA's definition of an employee, adding "with respect to employment in a foreign country, such term includes an individual who is a citizen of the United States."

**Complaint:** a written statement, alleging violation of the ADA, which contains the complainant's name and address and describes the Town's alleged discriminatory action in sufficient detail to inform them of the nature and date of the alleged violation. It shall be signed by the complainant or by someone authorized to do so on his or her behalf. Complaints filed on behalf of classes or third parties shall describe or identify (by name, if possible) the alleged victims of discrimination.

**Covered Entity:** under the ADA, "covered entity" is an entity that must comply with the law. Under Title I, covered entities include employers, employment agencies, labor organizations, or joint labor-management committees. Under Title II, covered entities include state and local government instrumentalities, the National Railroad Passenger Corporation, and other commuter authorities, and public transportation systems. Under Title III, covered entities include public accommodations such as restaurants, hotels, grocery stores, retail stores, etc., as well as privately owned transportation systems.

**Cross Slope:** the grade that is perpendicular to the direction of pedestrian travel.

**Curb Line:** a line at the face of the curb that marks the transition between the curb and the gutter, street, or highway.

**Curb Ramp:** a ramp that cuts through or is built up to the curb. Curb ramps can be perpendicular or parallel, or a combination of parallel and perpendicular ramps.

**Direct Threat:** a significant risk to the health or safety of others that cannot be eliminated by reasonable accommodation.

**Disability:** with respect to an individual, means: a physical or mental impairment that substantially limits one or more of the major life activities of such individual; a record of such an impairment; or being regarded as having such an impairment.

**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 Town'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.

**Employer:** a person engaged in an industry affecting commerce who has 15 or more employees for each working day in each of 20 or more calendar weeks in the current or preceding calendar year, and any agent of such person, except that, for two years



following the effective date of this subchapter, an employer means a person engaged in an industry affecting commerce who has 25 or more employees for each working day in each of 20 or more calendar weeks in the current or preceding year, and any agent of such person. Exceptions: The term "employer" does not include the United States, a corporation wholly owned by the government of the United States, or an Indian tribe; or a bona fide private membership club (other than a labor organization) that is exempt from taxation under section 501(c) of Title 26 [the Internal Revenue Code of 1986].

**Equal Employment Opportunity Commission (EEOC):** the Federal agency charged with enforcing Title I of the ADA.

**Essential Job Functions:** the fundamental job duties of the employment position that the individual with a disability holds or desires. The term "essential functions" does not include marginal functions of the position.

**Equal Employment Opportunity:** an opportunity to attain the same level of performance or to enjoy equal benefits and privileges of employment as are available to an average similarly-situated employee without a disability.

**Existing Facility:** refers to buildings that were constructed before the ADA went into effect. A public building constructed before the effective date of Title III does not have to be fully accessible unless the removal of barriers, including structural ones, is readily achievable.

**Facility:** all or any portion of buildings, structures, improvements, elements, and pedestrian or vehicular routes located in the public right-of-way.

**Grade Break:** the line where two surface planes with different grades meet.

**Historic Properties:** those properties that are listed or eligible for listing in the National Register of Historic Places or properties

designated as historic under State or local law.

**Job Analysis:** a formal process in which information about a specific job or occupation is collected and analyzed.

**Job Description:** a detailed summary, usually written, of the major components of a job. A typical job description consists of six major components: essential job functions, knowledge and critical skills, physical demands, environmental factors, the roles of the ADA and other Federal laws such as the Occupational Safety Health Act, and any explanatory information that may be necessary to clarify job duties or responsibilities.

**Job Related and Consistent with Business Necessity:** standard used to determine whether a qualification standard or employment policy concerns an essential aspect of the job and is required to meet the needs of the business.

**Light Duty:** generally, "light duty" refers to temporary or permanent work that is physically or mentally less demanding than normal job duties. Some employers use the term "light duty" to mean simply excusing an employee from performing those job functions that s/he is unable to perform because of an impairment. "Light duty" also may consist of particular positions with duties that are less physically or mentally demanding created specifically for the purpose of providing alternative work for employees who are unable to perform some or all of their normal duties. Further, an employer may refer to any position that is sedentary or is less physically or mentally demanding as "light duty". The term is often associated with workers compensation programs.

**Major Life Activity:** term used in the ADA definition of disability. It refers to activities that an average person can perform with little or no difficulty, such as walking, seeing, speaking, hearing, breathing, learning, performing manual tasks, caring for oneself,

and working. These are examples only. Other activities such as sitting, standing, lifting, or reading are also major life activities.

**Marginal Job Functions:** functions that are not considered essential to a job. Employers must consider removing marginal job functions as an accommodation under the ADA, but do not have to remove essential functions as an accommodation.

**Medical Examination:** a procedure or test that seeks information about an individual's physical or mental impairments or health. The following factors should be considered to determine whether a test (or procedure) is a medical examination: (1) whether the test is administered by a health care professional; (2) whether the test is interpreted by a health care professional; (3) whether the test is designed to reveal an impairment or physical or mental health; (4) whether the test is invasive; (5) whether the test measures an employee's performance of a task or measures his/her physiological responses to performing the task ; (6) whether the test normally is given in a medical setting; and, (7) whether medical equipment is used. In many cases, a combination of factors will be relevant in determining whether a test or procedure is a medical examination. In other cases, one factor may be enough to determine that a test or procedure is medical.

**Mitigating Measures:** medical treatment or devices that lessen the effects of an impairment, such as medication, a prosthesis, or a hearing aid. When determining whether a person has a disability under the ADA, the effect of mitigating measures is to be considered.

**Pedestrian Access Route (PAR):** a continuous and unobstructed path of travel provided for pedestrians with disabilities within or coinciding with a pedestrian circulation path.

**Pedestrian Circulation Path:** a prepared exterior or interior surface provided for pedestrian travel in the public right-of-way.

**Physical or Mental Impairment:** a physical or mental limitation that may include, but are not limited to: vision, speech, and hearing impairment; 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: tranvestism, 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.

**Public Accommodations:** entities that must comply with Title III. The term includes facilities whose operations affect commerce and fall within at least one of the following 12 categories: places of lodging (e.g., inns, hotels, motels) (except for owner-occupied establishments renting fewer than six rooms); establishments serving food or drink (e.g., restaurants and bars); places of exhibition or entertainment (e.g., motion picture houses, theaters, concert halls, stadiums); places of public gathering (e.g., auditoriums, convention centers, lecture halls); sales or rental establishments (e.g., bakeries, grocery stores, hardware stores, shopping centers); service establishments (e.g., laundromats, dry-cleaners, banks, barber shops, beauty shops, travel services, shoe repair services, funeral parlors, gas stations, offices of accountants or lawyers, pharmacies, insurance offices, professional offices of health care providers, hospitals); public transportation terminals, depots, or stations (not including facilities relating to air transportation); places of public display or collection (e.g., museums, libraries, galleries);

places of recreation (e.g., parks, zoos, amusement parks); places of education (e.g., nursery schools, elementary, secondary, undergraduate, or postgraduate private schools); social service center establishments (e.g., day care centers, senior citizen centers, homeless shelters, food banks, adoption agencies); and places of exercise or recreation (e.g., gymnasiums, health spas, bowling alleys, golf courses).

**Public Entity:** entities that must comply with Title II. The term is defined as: any state or local government; any department, agency, special purpose district, or other instrumentality of a state or local government; or certain commuter authorities as well as Amtrak. It does not include the Federal government.

**PROWAG:** Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way. These proposed guidelines (dated July 26, 2011) provide design criteria for public streets and sidewalks, including pedestrian access routes, street crossings, curb ramps and blended transitions, on-street parking, street furniture, and other elements. The specifications comprehensively address access that accommodates all types of disabilities, including mobility and vision impairments, while taking into account conditions and constraints that may impact compliance, such as space limitations and terrain.

**Qualified Individual with a Disability:** an individual with a disability who, with or without reasonable modification to rules, policies, or practices, removal of architectural, communication, or transportation barriers, or the provision of auxiliary services or aids, meets the essential eligibility requirements for the receipt of services or the participation in programs or activities provided by the Town.

**Readily Achievable:** easily accomplishable and able to be carried out without much difficulty or expense. In determining whether an action is readily achievable, factors to be considered include nature and cost of the

action, overall financial resources and the effect on expenses and resources, legitimate safety requirements, impact on the operation of a site, and, if applicable, overall financial resources, size, and type of operation of any parent corporation or entity. Under Title III, public accommodations must remove barriers in existing facilities if it is readily achievable to do so.

**Reasonable Accommodation:** under Title I, a modification or adjustment to a job, the work environment, or the way things usually are done that enables a qualified individual with a disability to enjoy an equal employment opportunity. Reasonable accommodation is a key nondiscrimination requirement of the ADA.

**Reasonable Program Modifications:** if an individuals' disabilities prevent them from performing the essential functions of the program or activity, it is necessary to determine whether reasonable program modifications would enable these individuals to perform the essential functions of the program or activity.

Reasonable program modification is any change in a 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 known disabilities only. Modification is not required if it changes the essential nature of a program or activity for 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 Town.

**Record of an 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. An example: a man, who is in line for a promotion, has a history of cancer treatment, although he is now free of cancer. He is not given the promotion because his bosses are worried that, if his cancer returns, he won't be able to do the job. He does not, at this point, meet the first part of the definition of disability because he does not have a physical or mental impairment that substantially limits one or more major life activities. However, based on his "record of" an impairment, he is being discriminated against.

**Regarded as Having a Disability:** an individual is disabled if he or she is treated or perceived as having an impairment that substantially limits major life activities, although no such impairment exists. An example: a woman applies for a job as a customer service representative at a department store. Her face is badly scarred from an automobile accident. The interviewer doesn't want to give her the job, in spite of her skills and experience, because he thinks customers will be uncomfortable looking at her. She is not substantially limited in any major life activity, but the interviewer is "regarding her as" if she has a disability.

**Running Slope:** the grade that is parallel to the direction of pedestrian travel.

**Service Animal:** any dog that is individually trained to do work or perform tasks for the benefit of an individual with a disability, including physical, sensory, psychiatric,

intellectual, or other mental disability. Other species of animals, whether wild or domestic, trained or untrained, are not service animals for the purposes of this definition.

### **Substantial Limitation on Major Life**

**Activities:** An individual is disabled if she or he has a physical or mental impairment that (a) renders her or him unable to perform a major life activity, or (b) substantially limits the condition, manner, or duration under which she or he can perform a particular major life activity in comparison to other people.

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.

**Title V of the Rehabilitation Act of 1973:** title of the law that prohibits discrimination on the basis of a disability by the Federal government, Federal contractors, by recipients of Federal financial assistance, and in Federally conducted programs and activities.

**Transition Plan:** refers to a requirement that state and local governments employing 50 or more people develop plans detailing structural changes necessary to achieve facility and program accessibility.

**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 Town. 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 Town of LaGrange, the Town shall attempt to identify another modification that would not pose such a burden. If cost causes the undue burden, the Town must consider whether funding for the modification is available from an outside source. If no such funding is available, the Town 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.

**Undue Hardship:** with respect to the provision of an accommodation under Title I of the ADA, significant difficulty or expense incurred by a covered entity, when considered in light of certain factors. These factors include the nature and cost of the accommodation in relationship to the size, resources, nature, and structure of the employer's operation. Where the facility making the accommodation is part of a larger entity, the structure and overall resources of the larger organization would be considered, as well as the financial and administrative relationship of the facility

to the larger organization. Employers do not have to provide accommodations that cause an undue hardship.

**Uniform Federal Accessibility Standards (UFAS):** one of two standards that state and local governments can use to comply with Title II's accessibility requirement for new construction and alterations. The other standard is the ADA Accessibility Guidelines.

**U.S. Department of Justice:** Federal agency that is responsible for enforcing Titles II and III of the ADA.

**U.S. Department of Transportation:** Federal agency that enforces nondiscrimination in public and private transportation. Nondiscrimination includes access to public bus, train and paratransit, as well as privately operated bus and shuttle transportation. The ADA does not cover air transportation, which is subject to the Air Carrier Access Act.

**Vertical Surface Discontinuities:** vertical differences in level between two adjacent surfaces.





## 3.0 Self-Evaluation of Town Policies, Services, Activities, and Programs - Findings & Recommendations

This segment of the self-evaluation plan summarizes the review of current Town-wide policies, services, activities, and programs based on meetings with Town staff and responses to the program accessibility questionnaire received from Town departments and offices. The findings and recommendations contained in this segment will provide the basis for the implementation of specific improvements for providing access to Town programs.

### 3.1 Program Evaluation Interdepartmental Memo

The self-evaluation of the Town's services, programs, and activities required and involved the participation of every Town department. The Town of LaGrange evaluated its policies, procedures and programs to determine current levels of service and the extent to which its policies and programs created barriers to accessibility for persons with disabilities. DLZ distributed a questionnaire to the Clerk-Treasurer as one measure to determine the level of ADA compliance. This memo requested department staff to provide the following:

- A contact person who can provide answers to inquiries about ADA compliance in the department
- A list of current services/programs that the department provides to the public
- A list of programs offered to persons with disabilities
- If any services provided segregate persons with disabilities from others in the same program
- If modifications are needed to provide access to programs
- A list of permits, licenses, certifications, etc. provided by the department
- Location of their office
- A listing and location of any auxiliary aids provided

- A listing of papers, documents, and audio/visual media provided to the public
- A listing of specific policies or procedures in place to accommodate persons with disabilities for programs offered
- A list of any ADA training that has been attended, performed or is planned to be done
- Provide background on how the department has interacted with anyone with a disability and what actions were taken to assist meeting that person's needs
- A list of any suggestions for modifications to the department's service, policies, and procedures that may better serve persons with disabilities

The responses to this questionnaire have been incorporated in the following sections.

### 3.2 Overall Findings – General Policies and Practices

The Town's self-evaluation of their Departments identified common accessibility issues between all Town Departments. The findings from the Town Departments can be organized into the following general categories:

- Public Information
- Designation of ADA Coordinator
- Grievance/Uniform Complaint Procedures
- Public Meetings
- Accommodations to Access Programs, Services and Activities
- Special Events and Private Events on Town Property
- Contracted Services and Contractors
- Customer Service, Satisfaction, and Input
- Equally Effective Communication
- Alternate Communication Formats
- Fees and Surcharges
- Information and Signage
- Staff Training
- Emergency Evacuation Procedures
- Curb Ramps and Sidewalks



- Employment

The findings and recommendations in the following subsections apply to all departments.

### 3.3 Public Information

The Town is required to notify the public of their rights and protections under the ADA ([28 CFR 35.106](#)), which states: “A public entity shall make available to applicants, participants, beneficiaries, and other interested persons information regarding the provisions of this part and its applicability to the services, programs, or activities of the public entity, and make such information available to them in such manner as the head of the entity finds necessary to apprise such persons of the protections against discrimination assured them by the Act and this part.” In addition, notices regarding ADA should be included in a number of other situations to inform the public of their rights and opportunities to ensure accessibility, including signage directing the public to accessible routes and entrances.

#### **Self-Evaluation General Findings:**

- A poster entitled “Equal Opportunity is the Law”, defining the requirements of Title VII of the Civil Rights Act, is posted in Town Hall and at the Wastewater Plant.
- Public meeting agendas, meeting minutes, public notices, and other information published by the Town do not have an ADA compliance statement included within.
- Meeting notices are posted at Town Hall.
- The Clerk-Treasurer has been appointed an ADA Coordinator.

#### **Recommended Action:**

- Standard language for a Notice of Nondiscrimination needs to be used by all departments for all Town publications and printed materials where it is not currently used. This statement should include the following notice (or a similar notice) regarding the Town’s commitment to providing accessible services: *The Town of LaGrange acknowledges its responsibility to comply with the Americans with Disabilities Act of 1990. In order to assist individuals*

*with disabilities who require special services (i.e. sign interpretative services, alternative audio/visual devices, and amanuenses) for participation in or access to Town sponsored public programs, services and/or meetings, the Town requests that individuals make requests for these services seventy-two (72) hours ahead of the scheduled program, service and/or meeting. To make arrangements, contact Mark Eagleson, ADA Coordinator, at (260) 463-3241. Email: [meagleson@townoflagrange.in.gov](mailto:meagleson@townoflagrange.in.gov).* Provide information to each department on how to produce printed information in alternative formats for persons with various disabilities to ensure that requests are handled in a uniform and consistent manner.

- Ensure the uniformity of charges for a publication for all formats of that publication.
- Include the following notice (or similar) on all materials printed by the Town that are made available to the public: *This publication can be made available in alternative formats, such as Braille, large print, audiotape, or .pdf. Requests can be made by calling (260) 463-3241. Please allow seventy-two (72) hours for your request to be processed.*
- Provide program, facility, permit, application, and reservation information in a variety of formats upon request (for example, enlarge print format for persons with visual disabilities or in simple language for persons with cognitive disabilities). Provide programmatic changes (i.e. staff assistance), upon request to assist in filling out forms or when alternative formats are unavailable or infeasible.
- Improve availability of public information in an accessible format on Town Website. More information on this is included in 3.11 and Section 6 of this report.

### 3.4 Designation of ADA Coordinator

The ADA regulations require any public entity with fifty (50) or more employees to designate at least one employee to coordinate ADA compliance ([28 CFR 35.107 \(a\)](#)). Federal regulations require public entities to make

available to all interested persons the name, office address and telephone number of the ADA Coordinator. The ADA Coordinator's role is to plan, coordinate, organize, facilitate, and promote compliance efforts. The Coordinator responds to requests for accommodations or barrier removal. The Coordinator also receives and investigates complaints and grievances.

#### **Self-Evaluation Findings:**

- The Town Manager has been designated the Town ADA Coordinator effective 2014 by the Council. Activities related to ADA compliance should be directed to him, and each Town department or office should designate a liaison for ADA issues and publicize who that person would be.
- The ADA Coordinator has full-time job in addition to ADA duties, which suggests this individual must squeeze these responsibilities into their daily workload.

#### **Recommendations:**

- Information regarding the identity of the Town's ADA Coordinator should continue to be provided to staff, posted at all Town locations, incorporated into employee handbooks, staff and public phone directories, and placed in frequently used publications.
- The designated ADA Coordinator must be familiar with the requirements of ADA and get appropriate training to ensure compliance by the Town.
- It is strongly suggested that each department have one individual with knowledge of ADA issues that can respond to issues that arise within their department and assist the ADA Coordinator.
- It is recommended the Town publish the name, address, e-mail address and phone number of the Town of LaGrange ADA Coordinator in appropriate public notices, agendas, and Town publications frequently distributed to the general public. Publications should also include a TDD/TTY capable number.

### **3.5 Grievance/Uniform Complaint Procedures**

A public entity that employs fifty (50) or more employees must adopt and publish grievance procedures which provide for the prompt and equitable resolution of complaints alleging any action that would be prohibited by the ADA ([28 CFR 35.107 \(b\)](#)).

#### **Self-Evaluation Findings:**

- The Town of LaGrange does have a standardized complaint procedure that provides for a both a means to file a complaint and what happens after a complaint is filed. See Appendix E – Forms and Notices for Ordinance # 2013-2-4(c) dated February 4, 2013.

#### **Recommendations:**

- Publicize and conspicuously post non-discrimination policies and grievance procedure to ensure staff and public can access the adopted grievance/complaint procedure.
- Alternative means of filing complaints or grievances may be accepted at the discretion of the ADA Coordinator, i.e. telephone, e-mail, letter, personal interview, or tape recording, upon request.
- The Town should internally track complaints and resolution. Centralized record keeping of such information will help the Town to regularly update its compliance efforts, and plan for additional compliance implementation.
- The Town should keep Department heads informed about all grievances filed against their department, as well as actions taken by the Department in response.
- Customer-service staff should have training in how to handle grievances or complaints when they are filed.
- The ADA coordinator should have training in the requirements of the law and in methods for investigating and resolving grievances fairly and promptly.

### **3.6 Public Meetings**

Public meetings are routinely held by various Town departments, boards, and commissions.

The ADA prohibits public entities from excluding persons with disabilities from programs, services, or activities offered by a public entity. The law does allow a public entity to use both structural and nonstructural methods to achieve accessibility to programs, services, and activities ([28 CFR 35.150 \(a\)\(1\); \(b\)\(1\)](#)).

### **Self-Evaluation Findings:**

- The following boards/commissions meet at various times on Town business and would be considered open meetings that can be attended by anyone:
  - LaGrange Town Council (Town Hall, 1<sup>st</sup> and 3rd Monday of the month, 6pm)
  - LaGrange Redevelopment Commission (Town Hall, as needed basis, advertised in media and at Town Hall prior to meetings)
- Board of Zoning Appeals is a County service. The Town appoints individuals to this board to act on its behalf.
- All public meetings are held at Town Hall. This location is not currently fully accessible.
- Meeting minutes posted on the website are scanned pdfs not compatible with reader programs. (See 3.11 - *Equally Effective Communication*.)
- Agendas are not provided in advance of public meetings on the website. They are typically posted 1 day before meetings at Town Hall.
- Public notices and agendas include a statement regarding how requests for accommodations for persons with disabilities can be made, nor is a TDD/TTY number provided.

### **Recommendations:**

- Priority in barrier removal should focus on Town Hall as it is the main location of all Town services.
- Continue including statement on all notices and agendas regarding how requests for accommodations for persons with disabilities can be made.
- The Town should develop procedures for obtaining and providing auxiliary aids such as assistive listening systems (if speaker

system is provided in the future), on-call sign language interpreters, readers, descriptive services, and other assistive technologies.

- Move disability related agenda items to the beginning of agendas when possible. Some people with disabilities are unable to stay late at a meeting since they may use para-transit or have fixed schedules, as they need to use personal care attendants.
- The Town should make reasonable modifications to enable individuals with disabilities to attend and participate in all public meetings.
- Provide meeting agendas and other meeting materials in alternative formats, when requested.
- The Town should assemble a list of readily accessible meeting spaces to facilitate the scheduling of meetings and/or the relocation of meetings so an individual with a disability can participate.
- The Town should create a simple checklist for creating accessible meetings and selection of accessible meeting spaces. This checklist should be utilized and available to all Town departments for their programs and events.

### **3.7 Accommodations to Access Programs, Services, and Activities**

The ADA prohibits public entities from excluding persons with disabilities from programs, services, or activities offered by a public entity. A public entity may not adopt policies that are discriminatory or engage in practices that are discriminatory. This prohibition applies to policies that are explicitly exclusionary and to those which appear to be neutral, but have discriminatory effect. The law does allow a public entity to use both structural and nonstructural methods to achieve accessibility to programs, services, and activities ([28 CFR 35.130 \(b\)\(3\); 35.150 \(a\)\(1\); \(b\)\(1\)](#)).

### **Self-Evaluation Findings:**

- There is no evidence of intentional discriminatory practices, intentional exclusion of individuals with disabilities, or

practices to segregate individuals with disabilities or limit access to Town programs, services, or activities.

- The Town Park does not provide any formal programs.
- Special Events are held on Town property, including a Farmers Market. Information regarding access to those programs is included in Section 3.8.
- Town Ordinance 2004-1-19A provides for fair housing throughout its corporate limits and specifically addresses discrimination on account of disability. ‘Handicap’ is used within text. (In 2008, the EEOC stated that use of the term “handicap” is outdated and should be replaced with “disability”. Update at such time as ordinance may require revision.)
- Town Ordinance # 2013-2-4(c), dated February 4, 2013, adopted the ADA Standards for Accessible Design as well as the PROWAG in further effort to ensure future facilities are compliant with the ADA. (See Appendix E – Forms and Notices.)

**Recommended Action:**

- Information directing the public how to request accommodations should appear on all public notices, announcements, and agendas. All Town departments should be provided with the Town’s ADA compliance statement for accommodations.
- Staff that has everyday contact with the public should receive training on interacting and accommodating individuals with disabilities. (This might include staff at the Clerk-Treasurers office, Utility office and Fire and Police employees.)
- The Town should provide additional and ongoing training for staff, including volunteers, regarding the requirements of the ADA and accommodations that provide equal access to programs, services and activities.
- The ADA Coordinator should continue to monitor programmatic access.

**3.8 Special Events and Private Events on Town Property**

The Town occasionally provides an opportunity for private organizations to utilize Town facilities for special or private events. Contained within the ADA are two titles that pertain to public and private entities. Public entities are not subject to Title III of the ADA. Conversely, private entities are not subject to Title II. In many situations, however, public entities have close relationships with private entities that are covered by Title III (Public Accommodations), with the result that certain activities may be at least indirectly affected by both Titles. This is the case with certain special events or private organizations that may use Town facilities.

**Self-Evaluation Findings:**

- Corn School is a yearly festival the Town cosponsors with a number of local individuals and businesses. This takes place mainly on SR9/Detroit Street, but also utilizes portions of East/West Town streets. Events include a midway, car shows, Little Miss Corn School Contest, various parades, and judging of a wide range of exhibits.
- The Town does not have any current policies to ensure that both private entities and Town staff are aware of their obligations to facilitate participation of individuals with disabilities in these special events or private events held on public properties.
- No specific special accommodations for accessibility have been made at any of these events to date.

**Recommended Action:**

- Guidelines or a policy should be established for ensuring that all special events are accessible.
- Events sponsored or co-sponsored by the Town should have accessible advertising and an accessible location. Additional accessible parking and restrooms should be provided based upon the event. This may include relocation of accessible parking as needed during street closures for festival setup and looking at common barriers such



as large electrical cords, inadequate clear width of pedestrian access routes, and protruding objects.

- The Town should ensure that all programs conducted by concessionaires, leasers, clubs, and contractors using Town facilities will be available to people with disabilities.
- In situations where private organizations sponsor events in Town facilities, the Town should require private organizations to comply with applicable ADA requirements. The Town should provide a checklist and information during the application process to inform organizers of their responsibility for accessibility under the ADA, if applicable.

### **3.9 Contracted Services and Contractors**

Public entities cannot use contract procurement criteria that discriminates against persons with disabilities ([28 CFR 35.130 \(b\)\(5\)](#)). In addition, selected contractors should be held to the same nondiscrimination rules as the Town.

#### **Self-Evaluation Findings:**

- No discriminatory or exclusionary practices were evident in the selection of contractors and contracted services.
- Paygov.us is a service used by the Town to collect payment of utility fees and other payments to the Town. This service is linked from the Town website.
- A code enforcement officer is contracted through the County and reports findings to the Town.

#### **Recommended Action:**

- All Town contracts should be reviewed to determine that they include specific, detailed ADA language to ensure that contractors comply with the ADA.
- It is recommended that the Town consider means to maintain compliance when contracting for services or when leasing facilities by:
  - Including ADA compliance requirements in new requests for proposals
  - Reviewing ADA requirements when contracts or leases are negotiated, revised, or renewed

### **3.10 Customer Service, Satisfaction, and Input**

ADA requires a public entity to provide an opportunity to interested persons and organizations to participate in the self-evaluation process. For three years after completion of the self-evaluation, a public entity must maintain a record of any problems identified ([28 CFR 35.105](#)).

#### **Self-Evaluation Findings:**

- Public notices of this SETP process were advertised in the local newspaper and invitations extended to local advocacy groups.
- No Departments or offices reported that they charge an additional fee for modifying a program for a person with a disability.
- Most public interaction (other than emergency/public safety services) occurs through the Clerk-Treasurer and utility office at the Town Hall.

#### **Recommended Action:**

- Continue the practice of not charging an additional fee for program modification(s) or alternative formats.
- Make appropriate modifications to regular practices to accommodate the needs of individuals with disabilities when providing customer service.
- Develop criteria for determining reasonable modifications to provide program accessibility, which may include acquisition or redesign of equipment, assignment of aides to persons with disabilities, and provision of services at alternate accessible sites. An approach should include:
  - Requests for reasonable modification in programs or services should be made to the department responsible for the program or service.
  - The department offering the program or service should interact directly with the individual with a disability to identify which aspects of the program limit participation and what modifications can be made.
  - The department offering the program or service should consult with the relevant

program or service staff to determine the reasonable modification. The department offering the program or service may also consult with the Town's ADA Coordinator or other resources providing services or information regarding persons with disabilities as appropriate.

- The department offering the program or service should document the modification(s) that was offered and the response of the person with the disability to the modification(s) offered. This documentation should be filed with the Town's ADA Coordinator. All accessibility requests should be tracked. The ADA requests should be analyzed periodically to look for global issues that can be addressed and problems that can be solved proactively.
- If individuals with a disability are not satisfied with the results of this process, they should be directed to the Town's ADA Complaint/Grievance Procedure.
- Partner with persons with disabilities, their caregivers, and advocates for the disabled to identify concerns and gather comments on capital improvement projects to improve accessibility to people with disabilities during design.

### **3.11 Equally Effective Communication**

ADA calls for public entities to provide applicants, participants, members of the public, and companions with disabilities with communication access that is equally effective as that provided to persons without disabilities ([28 CFR 35.160\(a\)-\(d\)](#)). The regulations also require that the public entity provide the appropriate auxiliary aids and services where necessary to give people with disabilities an equal opportunity to participate in, and enjoy the benefits of a service, program, or activity of a public entity. The law stipulates that the individuals can request the auxiliary aids and services of their choice and that the Town will honor the request unless a suitable substitute exists or the request is not required under the law. In addition, the Town may provide qualified interpreters via video from a remote

location as long as it can meet the performance requirements of [28 CFR 35.160\(d\)](#).

### **Auxiliary Aids and Services**

#### **Self-Evaluation Findings:**

- The Town has not provided people with disabilities written materials and publications in Braille or large print text, nor have they been asked to do so.
- No personal auxiliary aid units are available for use, though the Town does have an audio system. These are not required as the Town Hall does not provide fixed seating.

#### **Recommended Action:**

- The Town should provide staff training and information regarding auxiliary aids and effective communication.
- The Town could reserve front seats at meetings held in Town Hall for those with hearing impairments or consider the purchase of auxiliary listening devices for use during public meetings if public concerns are brought to their attention.
- The Town should confirm and update a complete list of auxiliary service providers, i.e. Braille transcription services, computer assisted transcript, dictation and transcription, assistive listening system, etc.

### **Interpreter Services**

#### **Self-Evaluation Findings:**

- There is not a Town-wide contract for qualified sign language interpreters for departments to contact when services are needed.

#### **Recommended Action:**

- The Town should consider developing a list of qualified sign interpreter services that departments could utilize as needed.
- Interpreters should be provided upon request for accommodations or in situations where an interpreter is known to be required.
- The Town should explore the viability of providing qualified sign interpreters from a

remote location and transmitting the disabled participant's response to the interpreter in accordance with [28 CFR 35.160\(d\)](#).

## Telecommunications Devices for the Deaf

### **Self-Evaluation Findings:**

- No Department reported using the Indiana Relay Service, or 711, to communicate with the hearing and speech impaired.
- The Utility Office has one hearing impaired customer who communicates through a service which requires no special equipment on the Town's end.

### **Recommended Action:**

- Where the Town uses an automated answering system for receiving and directing incoming telephone calls, the Town should enable this system to provide real-time communication with individuals using auxiliary aids and services, including TTY and telecommunications relay systems ([28 CFR 35.161\(b\)](#)).
- Widely disseminate information regarding the availability of email communication or other means of communicating with a person with a hearing or speech disability, such as the Indiana Relay Service (IRS) – "711". Relay Indiana is a free service that enables people who are deaf, hard of hearing, or speech impaired to communicate with standard voice telephone users. Both voice and IRS users can initiate a call from any telephone.
- All publications that list phone numbers should also include information on how people who are deaf or speech-impaired can communicate with departments by email.
- The Town should consider purchase of a centralized, direct, TDD/TTY telephone at Town Hall.

## Website

### **Self-Evaluation Findings:**

- The Town website provides extensive information including departmental and contact information, Town ordinances, and a number of downloadable forms including employment applications and utility service information.
- Town ordinances, meeting minutes, and several documents on the 'Forms' page are scanned pdfs not compatible with reader programs.
- Employment applications, permit applications, and a few other documents on the 'Forms' portion of the page are pdf created directly from word processing software and should be compatible with reader programs. The Town is in the process of making these conversions.
- Using the Web Accessibility Evaluation Tool (WAVE), the website provides a number of accessible features, including alternative text which presents the content of an image to reader programs, and alternative text on linked images ensuring the function and purpose of the link. Alerts included items such as lack of heading structure, extraneous text in links, and language of document not identified.

### **Recommended Action:**

- The Town's website development consultant should continue to work to develop and refine procedures to design, maintain, update, and monitor website accessibility.
- Recommended website content would include documents in an alternative text-based format, such as HTML (Hyper Text Markup Language) or RTF (Rich Text Format), in addition to PDF, publiTown of its statement of ADA compliance, contact information for Town ADA Coordinator, grievance and complaint procedures, self-evaluation/transition plan, and a list of the departments that offer TDD/TTY.
- The Town could work to improve the accessibility of web pages through the use of web accessibility analysis to meet or



exceed Section 508 of the Rehabilitation Act Amendments of 1998. Section 508 establishes a minimum level of accessibility for electronic information. Information on the requirements, along with suggestions for making websites accessible can be found at [www.ada.gov/websites2\\_prnt.pdf](http://www.ada.gov/websites2_prnt.pdf).

- The University of Wisconsin Trace Center (<http://trace.wisc.edu/world/web/>) provides resources and on-line information that might assist the County in further development and implementation of an accessible website.
- The Web Accessibility Initiative (WAI) provides guidance on making websites fully accessible ([www.w3.org/WAI/](http://www.w3.org/WAI/)).
- The International Center for Disability Resources on the Internet (ICDRI) provides information on accessibility ([www.icdri.org/section508/index.htm](http://www.icdri.org/section508/index.htm)).
- The Access Board and [DOJ](#) provide a number of resources on their websites as well.

### 3.12 Alternate Communication Formats

A public entity has a responsibility to provide information in alternative formats to comply with [28 CFR 35.160](#). This section of the ADA requires state and local government entities to communicate effectively with individuals who are deaf, hard-of-hearing, or have a speech, vision, or learning disability. Communication access involves providing content in methods that are understandable and usable by people with reduced or no ability to: speak, see, hear and limitations in learning and understanding. Some alternative formats can be produced in-house at minimal costs, i.e. large print, disks, and e-mail attachments. Other formats, such as Braille and audio-formats, may need to be produced by a vendor. Alternate communication formats that are likely to be requested include, but are not limited to: audio-formats, Braille, large print, captioned films and video, electronic text/disk/CD-ROM, or sign interpreted films and video.

#### **Self-Evaluation Findings:**

- Large print format media can be easily accommodated upon request via

computer/printer in the Clerk-Treasurers Office.

- Utility application is provided on the website in Spanish.
- Town staff indicated that they assist with filling out forms, if assistance is requested, or when alternative formats are not available.

#### **Recommended Action:**

- The Town should provide staff training regarding the requirements of accessible alternate formats, what accessible alternate formats are, and how to provide accessible alternate formats.
- Procedures and methods should be established for the development of accessible alternate formats to ensure that requests are handled in a uniform and consistent manner.

### 3.13 Fees and Surcharges

Public entities may not charge a fee or add a surcharge to a fee to cover the cost of making its facilities, programs, services, or activities accessible to persons with disabilities ([28 CFR 35.130\(f\)](#)).

#### **Self-Evaluation Findings:**

- There was no evidence of fees charged to individuals *with* disabilities that were not charged to individuals *without* disabilities to access programs, services, and activities.

#### **Recommended Action:**

- The Town should continue to monitor and review policies and practices to ensure that fees and surcharges are not charged to individuals *with* disabilities that were not charged to individuals *without* disabilities

### 3.14 Information and Signage

*A public entity is required to ensure that individuals with disabilities are directed to an accessible entrance to a building and to the location and existence of accessible services, activities, and facilities. The ISA shall be used at each accessible entrance of a facility ([28 CFR 35.163](#)). Paragraph (b) requires the public entity to provide signage at all inaccessible*

*entrances to each of its facilities that directs users to an accessible entrance or to a location with information about accessible facilities.*

**Self-Evaluation Findings:**

- Accessible directional and informational signs are not provided at any Town facilities and Town-owned sites.
- Inaccessible entrances do not provide adequate signage directing users to accessible entrances. See facility reports for further detail.

**Recommended Action:**

- An accessible signing strategy for Town facilities should be developed for interior and exterior directional, informational, and permanent room signs, in particular at Town Hall due to the high level of public interaction.
- Design standards for accessible signs should be created to guide the production and installation of the accessible signs.
- Signage replacement projects should include replacement or installation of accessible signs as required.

### **3.15 Staff Training**

*On-going compliance with the ADA can only be achieved if Town staff receives training and education about the rights of persons with disabilities and the obligations of public entities and its employees under Title II of the ADA. Although training is not required by the ADA, training regarding the requirements of the ADA is recommended.*

**Self-Evaluation Findings:**

- Officers attending training on 5/17/2012 and 12/4/2012. All officers are current on the minimal required annual training as of December 2012. These records are kept on file at the Indiana Law Enforcement Academy (ILEA).

**Recommended Action:**

- The Town should provide training regarding ADA and related civil rights legislation. Suggested training topics include, but are not limited to:

- Requirements of the ADA for the Town of LaGrange
- Consequences of Non-Compliance
- Acceptable Terminology and Phrases
- Grievance/Complaint Procedures
- Reasonable Accommodations
- Awareness and Sensitivity
- Disability Etiquette – a good resource is [http://transition.fcc.gov/cgb/dro/504/disability\\_primer\\_4.html](http://transition.fcc.gov/cgb/dro/504/disability_primer_4.html)
- Accessible Locations for Meetings
- Consequences of Non-Compliance
- Barriers to Access – Programmatic and Physical
- Auxiliary Aids and Services
- TDD/TTY (Placing and receiving calls)
- Building Evacuation Procedures to Assist Persons with Disabilities
- The Town should provide staff annual reminders about the ADA requirements with links to instructional information. A number of online training courses are available and are discussed in *Section 6 – ADA Tool Kit*.
- Training materials and handbooks should be prepared, if needed, in alternate formats.
- The ADA Coordinator should continue to provide or coordinate additional ADA training to all Department managers and staff who have regular contact with the public on interacting and accommodating individuals with disabilities.
- The ADA Coordinator should monitor any changes in the ADA law that will affect the Town and share with Town employees as appropriate.

### **3.16 Emergency Evacuation Procedures**

The Town is required to establish emergency evacuation procedures to safely evacuate persons with disabilities who may need special assistance in an emergency. These plans and procedures should include identification of assembly locations for persons with disabilities in each facility, staff assigned to ensure that assembly areas are checked prior to leaving buildings during an emergency, identification of assembly locations for pickup and transport of persons with disabilities, and location of

accessible shelters to be used for various types of emergencies.

**Self-Evaluation Findings:**

- Emergency Management is handled through the LaGrange County Emergency Management Agency (LCEMA) through a Letter of Agreement dated 3/1/2004.
- Town Marshal, Richard Snyder, was designated as a liaison/primary point of emergency communication to the LaGrange County Emergency Management Agency (LCEMA).
- Based on the LaGrange County Comprehensive Emergency Management Plan, (CEMP), it is recommended that the Town:
  - develop procedures for the protection of personnel, equipment, supplies, and critical public records from the effects of disasters
  - Develop procedures to ensure the continuity of essential services that may be needed during and after disasters
  - Attend annual emergency management related training and exercises conducted by LCEMA.
  - Establish policy and develop standard operating procedures to carry out provisions of CEMP
- The CEMP sections of Operations and Human Support are most relevant in terms of the ADA.
- Communications and warnings are carried out by LaGrange County Central Communications (E911)
- Shelter and Mass Care is coordinated by LCEMA and supported by the American Red Cross, local school corporations, churches, and campgrounds.
- Health and Medical support is coordinated by LaGrange County Health Department.
- Search and Rescue along with Firefighting is coordinated by LaGrange County Fire Chiefs and supported by local Fire Departments and Town Marshals.

- Evacuation Support and Public Information is provided by LaGrange County Sheriff's Department.
- The CEMP does not specifically address persons with disabilities.
- The Town does not currently have established evacuation or safety plans for each Town facility. No staff members have been designated to assist persons with disabilities to evacuate from Town facilities.

**Recommended Action:**

- Though not directly controlled by the Town, the CEMP should review and address the specific needs for evacuation of persons with disabilities or other special needs, including any special transportation requirements. The Town may encourage the County to review and update, if necessary, response procedures to include evacuation procedures to evacuate people with disabilities to suitable shelters depending on the nature of the emergency.
- Methods of providing public information should be reviewed to ensure effective dissemination to people of all abilities.
- Coordinate with the EMA and the American Red Cross to identify evacuation routes and shelters and ensure that vehicles used to evacuate residents are accessible, as are all of the emergency shelters.
- A list and/or map of public emergency shelters should be available for the public, including designating which provide accessible facilities. Shelter locations designated as accessible should be evaluated by the agency responsible for coordinating.
- The Town should develop evacuation and safety plans for each Town facility.
- Once evacuation and safety plans are developed for each Town facility, all staff should be made aware of the location of the posted accessible evacuation routes within their facilities.
- Develop guidelines for the evacuation of persons with disabilities for various emergency situations at all Town facilities, but especially at Town Hall. Each Department should use these guidelines to

create their own emergency evacuation plans which should:

- Address what to do when an alarm is triggered;
- Establish meeting places for assistance and evacuation chairs;
- Provide direction on what to do if assistance is not available;
- The Town should provide additional training and information regarding emergency evacuation procedures, particularly with regard to the evacuation of persons with disabilities.
- Take the necessary steps to ensure that emergency teams are aware of persons with disabilities in the community who may require special assistance in the event of an emergency.
- Encourage residents with special needs to register with the Town and/or County to ensure that proper assistance can be provided if needed.
- Excellent resources to enact the recommendations above can be found at:
  - [www.ada.gov/emergencyprepguide.htm](http://www.ada.gov/emergencyprepguide.htm)

### 3.17 Employment

Title I of the ADA requires public entities not to discriminate against persons with disabilities in all parts of the recruitment and employment process ([28 CFR 35.140](#) and [29 CFR 1630.4](#)).

#### **Self-Evaluation Findings:**

- The Town's employment application includes a statement indicating they 'consider applicants for all positions without regard to race, color, religion, creed, gender, national origin, age, disability, marital or veteran status, or any other legally protected status' as well as a provision to 'exclude membership which would reveal gender, race, religion, national origin, age, ancestry, disability, or other protected status' when inquiring about professional, trade, business or civic activities and offices held.
- The above mentioned items are not included on the Volunteer firefighter

application, but it does note that the Town is an Equal Opportunity Employer.

- The Clerk-Treasurer's Department primarily provides services to job applicants, Town employees, and retirees.
- A poster entitled "Equal Opportunity is the Law", defining the requirements of Title VII of the Civil Rights Act, is posted in Town Hall and at the Wastewater Plant.
- The Clerk-Treasurer's Office is aware they must provide reasonable accommodations to applicants or employees with a disability upon request.
- The Town's Employee Handbook (dated August 20, 2007) includes a number of references related to disabilities. They include:
  - Section II – Addresses Equal Employment Opportunity and Harassment Policy. See Appendix E – Forms and Notices.
  - Section III (D) – Addresses Family Medical Leave Act (FMLA) eligibility. Item 11 provides statement of policy of Non-discrimination/Non-retaliation in relation to FMLA.

#### **Recommended Action:**

- The Town should continue to practice the Town policies of nondiscrimination as required by ADA.
- The Town should consider providing on-going training in providing services to persons with a range of disabilities and developing strategies for appropriate modifications.
- The Town should confirm that staff members are trained in the availability and use of TDD equipment, 711 relay service, or other means of communicating over the telephone with a person with hearing disabilities.

### 3.18 Department Self-Evaluation Findings and Recommendations

DLZ prepared and distributed a questionnaire in January 2013 to all Town departments that



included a request for information about each. This information included specific items to help DLZ better understand the policies and procedures of each related to ADA understanding, training, and accommodation. DLZ reviewed responses and coordinated clarifications and questions with the ADA Coordinator. A general summary follows. A secondary benefit of the questionnaire is allowing DLZ to gain an understanding of how well the person completing the questionnaire understands the obligation to ensure their programs are accessible and their general understanding of how to provide accommodations.

### **Self-Evaluation Findings:**

- The Town's Clerk-Treasurer, Utility Office, Police, and Fire departments have extensive, daily public interaction that is both in person and over the telephone.
- No departments responded that the programs offered for persons with disabilities were different in any way.
- Mainly, the Clerk-Treasurer and Utility Office have publications, documents, and forms that are reviewed by, provided for, or submitted to them by the public.

### **Recommended Action:**

- Public interactions with persons needing special accommodation due to a disability is likely to occur for all departments at some point. Training should be provided to all departments to review how to accommodate various disabilities and provide the same level of service.
- All departments should have a liaison identified that will interact with the ADA Coordinator and be responsible for ADA compliance in their department.
- Continue to ensure that all programs offered do not segregate customers with disabilities or not provide the same type and level of service.
- Ensure that all publications, documents, and forms that are provided to the public can be made available in alternate formats easily. This would include large print versions and electronic versions in multiple file formats.

All departments should have an accessible work space or clipboard that can be provided to someone that cannot reach counters that are above required height.

- All departments evaluated have barriers present, all of which can be addressed by architectural modifications, various methods of equal accommodation, or changes in procedures.
- Funding will be a key component in improvements to physical barriers, but many improvements in service to persons with disabilities can be done inexpensively and within a short timeframe.
- The report includes a number of ways that departments can accommodate persons various disabilities, but circumstances and barriers vary between departments. Training of staff is a key component to knowing how to accommodate and provide equal service to persons with disabilities of all kinds.

### **3.19 Pedestrian Facilities within the Public Right-Of-Way**

The Town of LaGrange contains approximately 10 miles of public streets with existing pedestrian facilities under their jurisdiction. Other streets within the Town of LaGrange either do not have pedestrian facilities, or have pedestrian facilities but are under the control of the Indiana Department of Transportation (INDOT) or Federal Highway Administration (FHWA) such as portions of Detroit Street designated as SR 9 and Central Avenue designated as US 20. These two types of right-of-way areas were not evaluated for compliance.

Title II of the ADA ([28 CFR Section 35.150 \(d\)](#)) requires that state and local governmental entities develop a Transition Plan specific to curb ramps or other sloped areas at locations where walkways cross curbs and streets. A curb ramp (or sometimes referred to as a curb cut) is a short sidewalk ramp cutting through a curb or built up to it.

Curb ramps are a relatively small but important part of making sidewalks, crossings at



intersections, and other pedestrian routes accessible to people with disabilities. The ADA requires state and local governments to make pedestrian crossings accessible to people with disabilities by providing curb ramps ([28 CFR 35.150 \(d\)\(2\)](#); [35.151\(a\), \(b\), and \(i\)](#)). There is no requirement under Title II of the ADA or Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG) that sidewalks be made accessible or be provided where they are not currently provided. The law stipulates that the public entity provide curb ramps, or other sloped areas where pedestrian walks cross curbs, that are accessible. New construction or alterations would require that non-compliant sidewalks be improved to the extent possible.

### **Self-Evaluation Findings:**

- Sidewalk Construction Ordinance, dated December 17, 1979, Section 6 states that 'property owners shall be responsible for the construction and maintenance of sidewalks located on their property or on the right-of-way adjacent to their property.' Section 9 provides for ice, snow and debris removal by property owner or occupant.
- No obvious programs or policies were noted regarding providing temporary accessible routes during construction projects or special events.
- The Town performed a Town-wide accessibility survey of all sidewalks and curb ramps within the public ROW to determine compliance issues and develop a method for prioritizing which intersections and sidewalks are repaired first. (See *Appendix B – Public Right-Of-Way Reports*).
- A previous study titled 'LaGrange Trails' was completed analyzing pedestrian sidewalks within the Town. This study analyzed connectivity, condition, points of interest and opportunities for improvement throughout the Town.

### **Recommended Action:**

- As the burden of sidewalk construction and maintenance is placed on the property owner, the Town should improve code enforcement of the established ordinance

especially on routes regularly utilized by persons with disabilities.

- The study found that lack of a curb ramp at a high percentage of locations is one of the largest barriers to use. The Town has suggested replacement of curb ramps be a priority over sidewalk replacements as this renders sidewalks inaccessible. This may also allow time for development of a sidewalk program and long term strategies for maintaining said sidewalk network.
- The Town should provide accessibility standards so that property owners may ensure the new segments are correctly constructed. Similarly, if an owner is replacing sidewalk on a corner lot with ramp or blended transition, the Town should consider replacing the curb ramps at that time as well.
- The Town and its consultants should continue to prepare design plans and construction documents to meet or exceed state and Federal accessibility requirements for sidewalks, curb ramps and other ROW features.
- The Town should consider establishing construction guidelines and procedures for monitoring and maintaining accessible paths of travel throughout construction for pedestrians and bicyclists, i.e. sidewalk detour plans.
- Provide advance notice of all street or sidewalk closures on informational materials and at Town Hall.
- To aid in providing accessible pedestrian facilities, the Town should research grant possibilities such as those through INDOT's Safe Routes to School program, USDA Rural Development, US Department of Housing and Urban Development, and ADA Indiana.

### **3.20 Facility Self-Evaluation Findings and Recommendations**

DLZ performed a self-evaluation of the following Town facilities:

- Town Hall
- Fire Station
- Police Station

- Greenwood Cemetery
- LaGrange Town Park
- Public Parking at Intersection of Michigan and Poplar
- Town-owned Public Right-Of-Way (See Section 4)

A comprehensive review of accessibility at all public areas of these facilities was performed consistent with ADAAG and PROWAG standards, as appropriate. The following findings are a general summary only. See Appendices A and B for a complete detailed listing of non-compliant features.

### **Self-Evaluation Findings:**

- **Town Hall**



The Town Hall houses a vast majority of the programs offered by the Town of LaGrange. This facility has extensive daily interaction with the public. A number of barriers and/or non-compliant items exist at the Town Hall. These include, but are not limited to:

- Shared parking does not provide access aisles.
- Service counters where provided are not accessible.
- Electrical controls are outside of allowable reach range.
- Room signage does not provide Braille or raised text.
- Restroom exhibits a number of minor dimensional deviations, including

location of grab bars, toilet, and dispensers. Waterlines are not insulated. Current partition configuration does not provide adequate stall width.

- **Fire Department**



This facility has moderate daily interaction with the public which occurs mostly via telecommunication or outside of the facility. A number of barriers and/or non-compliant items exist at the Fire Station. These include, but are not limited to:

- Accessible entrance is not identified as not all doors are accessible or public use.
- Door hardware requires grasping and twisting. Door closers exceed operating effort and closing speed requirements.
- Restroom exhibits a number of minor dimensional deviations, including location of grab bars, toilet, mirror, and dispensers. Appropriate signage is not provided.

- **Public Parking Lot**



This lot is located at the corner of Michigan and Poplar and is frequently used by the public. Barriers to use include but are not limited to:

- Access aisles not provided.

- **Police Department**



This facility has moderate daily interaction with the public which occurs mostly via telecommunication or outside of the facility. A number of barriers and/or non-compliant items exist at the Police Station. These include, but are not limited to:

- Accessible entrance is not identified as not all doors are accessible or public use.
- Assistance button could be improved with color contrast and accessible signage.
- Restroom exhibits a number of minor dimensional deviations, including location of grab bars, toilet, and dispensers. Water controls require grasping and twisting. Appropriate signage is not provided.

- **Greenwood Cemetery**



This facility has limited daily interaction with the public. A number of barriers and/or non-compliant items exist at the Cemetery. These include, but are not limited to:

- No barrier-free parking stall is provided on the site.
- Level changes exist in accessible route.

- Adequate maneuvering space is not provided in the Cemetery Office.
- Door hardware requires grasping and twisting.
- Restrooms require extensive rework including repositioning of lavatory and various dispensers, replacement of water controls at sink and toilet, insulation of water lines, and providing grab bars and compliant signage.
- Restroom doors are of insufficient width and adequate maneuvering space is not available in either restroom.

- **LaGrange Town Park**



This facility has extensive daily use by the public. A number of barriers and/or non-compliant items exist at the Town Park. These include but are not limited to:

- No barrier-free parking stall is provided on the site.
- No accessible route is provided from the public right-of-way or parking to and in between park amenities including shelter, areas of sport activity, site furnishings, and play equipment.
- Accessible route within play areas meeting firm, stable and slip resistant requirement as well as CPSC fall zone safety requirements is not provided.
- Electrical controls and outlets at the shelter are outside of allowable reach range.
- Restrooms require extensive rework including adjustment of lavatory hardware, relocation of toilet and stall partitions, insulation of water lines, relocation of grab bars and providing compliant signage.



## 4.0 Self-Evaluation of Pedestrian Facilities with the Public Right-Of-Way – Project Approach

This segment of the self-evaluation plan summarizes the review of current ROW facilities. The findings and recommendations contained in this segment will provide the basis for the implementation of specific improvements for pedestrian access within the Public Right-Of-Way.

### 4.1 Data Collection and Methodology

The self-evaluation of the Town's Public ROW began with a review of available mapping to identify locations of all sidewalk and curb ramps within the Town limits. These pedestrian facilities were then inventoried and assessed using the Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG), dated July 26, 2011, as published by United States Access Board. Data collection was completed using Apple iPads and software to record the location of each data collection point, the numerical data, and to correlate the data with a photo of the facility inventoried.

The GeoJot application by GeoSpatial Experts was used for data collection. The GeoJot application provided a platform for the creation of ADA specific attribute lists to track inventory data.

### 4.2 Database Analysis

Upon completion of the Inventory and Assessment, the data collected was compiled into data sheets for each data collection point or location. Throughout the SETP, 'location' refers to a single data collection point. This may be a block, a portion thereof with logical stopping point, such as an alley or area with no sidewalk present, curb ramp, intersection or non-roadway related portion of public ROW. Each location was reviewed for compliance with each criterion required within the PROWAG (or ADAAG as applicable). A barrier ranking (High, Medium, or Low priority) was assigned to the location. Each location was then assigned a cost parameter based on the amount of

modification or reconstruction required to achieve accessibility.

### 4.3 Barrier Ranking

The self-evaluation of the public ROW takes into account factors such as level of use, degree of danger posed, complaints or requests for repair received, and other factors.

These factors can be grouped into two categories. **Contributing contextual factors** account for use patterns and distribution in relation to city services, residential zones, and public services. **Physical Impedance factors** include the actual physical characteristics of the specific right-of-way feature and the severity of the barrier to use.

#### *Contributing Contextual Factors:*

**Areas of High Pedestrian Activity** – High priority areas include areas with high levels of pedestrian traffic. These included, but are not limited to, those areas adjacent to downtown, schools, community centers, churches, public transportation hubs, retail centers, and parks.

**Areas with a Higher Concentration of persons with disabilities** – High priority areas include senior centers, assisted living communities, and areas adjacent to medical facilities.

**Areas of High Volume Streets** – High priority areas include the pedestrian facilities along major arterial streets. These are frequently the connectors between residential areas and destinations such as shopping centers, employment, and medical centers.

**Areas accessing Places of Public Accommodation** – High priority areas include those pedestrian facilities serving local government offices and facilities, such as Town Hall, public libraries, and community centers.

### ***Physical Impedance Factors:***

- **Hazardous** – High priority areas include areas with generally hazardous conditions to any pedestrian. These included, but are not limited to, trip hazards, extreme slopes, and major obstructions and protrusions.
- **High priority** - High priority areas include areas with conditions that make travel difficult or impossible for the independent pedestrian and affect the ability of persons with disabilities to access or use a facility or program. These included, but are not limited to, missing curb ramps, steep slopes, particularly cross slopes impacting lateral balance, changes in level over 1", and fixed obstructions limiting vertical and horizontal clearance.
- **Medium priority** – Medium priority areas include areas with conditions that make travel moderately difficult, but passable and affect the quality of usage for persons with disabilities to a greater extent than that afforded the non-disabled. These included, but are not limited to, moderate deviations in running and cross slopes, changes in level ½" to 1", obstructions that allow tight passage, landing and PAR width deviations.
- **Low priority** – Low priority areas include areas with conditions that deviate from codes and standards but alternative means of use may be available to provide equal access or opportunities. In low priority areas, conditions may be an inconvenience, but neither travel nor safety is greatly impacted. These areas allow significant usability and independent travel is possible in most cases. These included, but are not limited to, minor deviations in running and cross slopes, changes in level, landings and PAR width deviations, and presence of standard elements such as detectable warnings not in compliance with guidelines.

### **4.4 Contributing Contextual Analysis**

The self-evaluation of the Town's ROW included identification of contributing contextual factors for use in barrier ranking.. These factors will be analyzed on a yearly basis as the

Town identifies the work scope for that year's improvements. Locations of Town of LaGrange and other governmental facilities, commercial centers, and densities of residential development may change over time, and should be reevaluated to accommodate the current greatest need for improvements at time of implementation.

### **4.5 Additional Right-Of-Way Elements**

Additional elements that may be encountered during right-of-way evaluation include site furnishings, accessible pedestrian signals, roundabouts, marked or metered on-street parking and rail crossings. These were not encountered during the evaluation of the Town of Lagrange except for on-street parking. See Item 4.5 for On-Street Parking findings.

If provided in the future, site furnishings should be located on an accessible route, provide clear level ground space for approaches and wheelchair parking adjacent to benches, and meet reach range requirements for any operable parts, such as trash receptacle flaps.

According to the Public Rights-Of-Way Accessibility Guidelines, *'An accessible pedestrian signal and pedestrian push button is an integrated device that communicates information about the WALK and DON'T WALK intervals at signalized intersections in non-visual formats (i.e., audible tones and vibro-tactile surfaces) to pedestrians who are blind and have low vision.'* Per R209, *'where pedestrian signals are provided at pedestrian street crossings, they shall include accessible pedestrian signals (APS) and pedestrian push buttons complying with sections 4E.08 through 4E.13 of the 2009 Manual on Uniform Traffic Control Devices (MUTCD).'* At such time as the Town plans infrastructure improvement projects where new signal construction or alterations including signal controller, software or signal head replacement occurs, accessible pedestrian signals should be considered for inclusion.



## 4.6 On-Street Parking

### Requirements:

Per R214 of the PROWAG, *'where on-street parking is provided on the block perimeter and the parking is marked or metered, accessible parking spaces shall be provided. Accessible parking spaces should be located where the street has the least crown and grade and close to key destinations (R309.1).*

*Where width of sidewalk or available ROW exceeds 14', an access aisle shall be provided at street level the full length of the parking space and shall connect to a pedestrian access route. Access aisle shall comply with R302.7 and shall not encroach on vehicular travel lane. An access aisle is not required where width of adjacent ROW is less than or equal to 14'. Where an access aisle is not provided, the parking spaces shall be located at the end of the block face (R309.2). Where perpendicular or angles parking is provided, an access aisle 8' wide minimum shall be provided at street level the full length of the parking space and shall connect to a PAR. (309.3)'. While PROWAG does not require specific delineation of barrier-free and van parking, it is generally recommended that some spaces be specifically marked as van-accessible. Where van-accessible spaces are provided at angled parking, it is also recommended that the access aisle be located on the passenger side to facilitate deployment of a lift from the vehicle.*

Parking space identification signage is required per PROWAG. Signs shall include the International Symbol of Accessibility. Van parking spaces shall be designated as 'Van Accessible'. Signs should be located 60" minimum to bottom of sign if not located on pedestrian circulation route, with 80" minimum from finish grade provided if along pedestrian circulation route to avoid protruding objects. For parallel parking, they should be located at the head or foot of the parking space per R211.4.

Marked on-street parking within LaGrange is located mainly in the downtown area.

Throughout other areas of the Town, on-street parking is provided but not marked. The majority of on-street parking is provided within INDOT ROW along Detroit St/SR 9. While these are not under the jurisdiction of the Town, they were included in the block face parking counts to evaluate the correct number of accessible spaces to be provided.

Marked parking within the Town consists mainly of parallel and angled parking. Counts were taken on each block face where marked parking is provided to determine the number of parking spaces required. Currently, 5 spaces are designated as accessible. Per the parking counts, the Town needs to provide 23 spaces for compliance. Parking requirements are calculated on and to be provided on a per block face basis. As such, all 21 of the existing spaces may not be in a location to satisfy the requirements to count towards the total numbers needed. See Appendix B, Exhibit B-1 for specific counts and locations.

In general, these observations were made:

- Accessible aisles were missing.
- Slopes exceeded 2% maximum.
- Where provided on brick streets, bricks were displaced creating an uneven surface.
- Signs of ponding were observed at 2 spaces.
- Signs were not mounted at correct heights.
- Van spaces were not provided and/or not designated as such.
- Spaces were frequently located at the end of a block, but the connection to the nearest curb ramp did not meet the requirements of an accessible route.
- Accessible parking was not provided on each block face or inadequate quantities.

### Addressing the Issue:

Providing spaces may be as simple as providing pavement markings and signage. Other areas may require regrading and repaving of the parking space to meet slope requirements, and/or installation of accessible curb ramps where none is provided adjacent to the proposed space.

Each block faced surveyed should be analyzed to determine the most logical placement of the required parking spaces. Priority should be given to those areas serving local government offices and facilities and highly used retail and placed to offer the shortest accessible route to such services.



*Example of angled parking provided on a brick street: Space does not provide adequate markings including access aisle and shows evidence of drainage issue.*



*Example of parallel parking space: Signage is provided, but an accessible connection to the adjacent sidewalk and access aisle are not provided. It is preferred for parallel parking where ROW is 14' or greater to provide an access aisle.*

## 5.0 Self-Evaluation of Pedestrian Facilities with the Public Right-Of-Way – Sidewalk Inventory

This segment of the self-evaluation plan summarizes the review of current sidewalks within the public ROW. The findings and recommendations contained in this segment will provide the basis for the implementation of specific improvements to accessibility on Town sidewalks.

### 5.1 Pedestrian Access Route

Per R204 of the PROWAG, ‘a *pedestrian access route is a continuous and unobstructed path of travel provided for pedestrians with disabilities within or coinciding with a pedestrian circulation path in the public Right of Way. Pedestrian Access Routes in the public Right of Way ensure that the transportation network used by pedestrians is accessible to pedestrians with disabilities....Pedestrian access routes must be provided within sidewalks, and other pedestrian circulation paths located in the public right-of-way; pedestrian street crossings, and at-grade rail crossings, including median and refuge islands; and overpasses, underpasses, bridges and similar structures that contain pedestrian circulation paths.*’ In addition to defining the Pedestrian Access Route (PAR), this definition also provides guidance on determining the scope of areas to be evaluated for compliance.

Per the Technical provisions of the PROWAG, the sidewalk PAR must meet the following general criteria:

- R302.3 Continuous Width
- R302.4 Passing Spaces
- R302.5 Grade (Running Slope)
- R302.6 Cross Slope
- R302.7 Surfaces

Within the following text, ‘location’ refers to a single data collection point. This may be a Town block, a portion thereof with logical stopping point, such as an alley or area with no sidewalk present, or non-roadway related portion of public ROW. Percentages and

numbers shown should not be interpreted as a quantity of infrastructure. Likewise, compliance for one criterion does not indicate compliance in for all criteria.

### 5.2 Width

#### Requirements:

Per R302.3, the continuous clear width shall be 4’ minimum exclusive of the width of curb. Five feet of width is preferred, as when the clear width is less than 5’, passing spaces must be provided every 200’ maximum. This provides greater flexibility to the pedestrian to accommodate changes in direction, passing movements, and turning space.

Within the Town, several locations surveyed were 48” in width, but had been overgrown significantly by the adjacent law leaving them out of compliance. Many sections also exceed 200’ of length with no passing space available, though some had driveways that could potentially serve this purpose.



*Example of sidewalk width narrowed by overgrowth*

#### Addressing the Issue:

- Where overgrowth narrows walks, turf should be removed to allow for full 48" width.
- Where walk width is less than 48" width and ROW is available, sidewalk width can be corrected by widening the sidewalk to at least the minimum requirement. Five feet should be considered for all new sidewalk construction.

### 5.3 Grade (Running Slope)

#### Requirements:

Per R302.5, the grade (running slope) of the sidewalk PAR shall not exceed the grade of the adjacent street. Otherwise, a 5% maximum is imposed.

Within the Town, very few locations were over the 5% maximum running slope.

#### Addressing the Issue:

For running slopes of over 5% (**where not adjacent to roadways exceeding that**), potential solutions may include:

- Lowering grade.
- Removing and regrading adjacent shallowly sloped panels to spread the slope over a greater run and achieve a more even, compliant slope throughout.

### 5.4 Cross Slope

#### Requirements:

Per R302.6, the cross slope of the sidewalk PAR shall be 2% maximum. Exceptions to this rule occur only at pedestrian street crossings without yield or stop control or midblock crossings and will be discussed in Section 5 - Crosswalks. Nearly 95% of blocks exhibited some level of non-compliance for cross slope. Often, heaving by tree roots caused cross slope non-compliance.

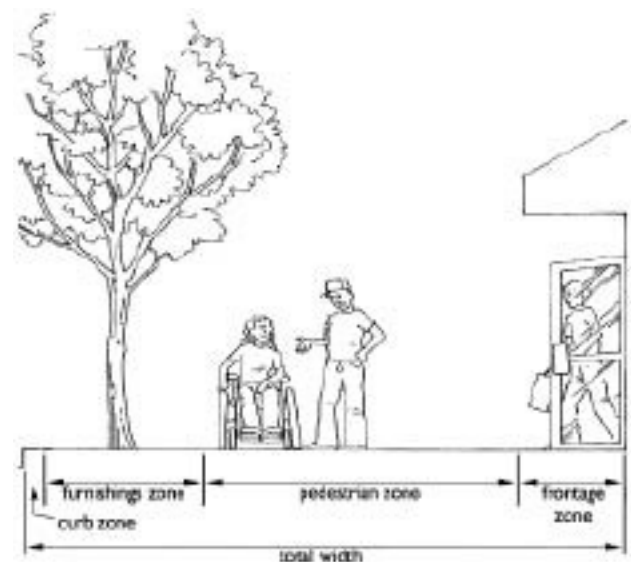
#### Addressing the Issue:

For cross slopes of over 2%, potential solutions may include:

- Lowering grade.

- Removing and regrading adjacent tree lawn to achieve a compliant slope throughout.
- Within the Downtown area, providing a compliant cross slope area at required clear width to accommodate PAR and creating steeper transitional area between PAR and curb. Often referred to as the furnishings zone (see illustration).
- Installation of curb or retaining walls in areas where grading cannot be implemented due to right-of-way, or adjacent fronting buildings.

This illustration from the FHWA publication "*Designing Sidewalks and Trails for Access*" shows the divisions of sidewalk width by function—furnishings zone, pedestrian zone, and frontage zone. Understanding these zones and the role of the Pedestrian Access route may be useful in developing solutions to cross slope issues in downtown areas.



### 5.5 Changes in Level / Surface Condition

#### Requirements:

Per R302.7, the surface of the PAR shall be firm, stable, and slip-resistant. Grade breaks shall be flush. Vertical surface discontinuities (changes in level) shall be 1/2" maximum with those between 1/4" and 1/2" being beveled at slope not steeper than 50% across the entire



discontinuity. Horizontal openings such as grates and joints may not exceed  $\frac{1}{2}$ ". Elongated openings should be placed perpendicular to dominant direction of travel.

During the evaluation, surface condition was evaluated for damage from cracking and spalling. A majority of sidewalk within the Town displayed significant cracking and spalling due to age of infrastructure and adjacent tree growth.



*Example of displacements and cracking of sidewalk at existing tree*

#### **Addressing the Issue:**

Changes in level and surface condition are a common problem as infrastructure ages. Temporary fixes of high hazard areas can be implemented to promote the safety of all users while long-term solutions are set into action. Public input is particularly important in locating hazardous areas as they occur. In general, the following solutions can address changes in level and surface condition.

#### **Level Changes**

- Temporary placement of concrete or asphalt to ramp from adjacent panel
- Grinding edge at surface changes of up to  $\frac{1}{2}$ " to achieve allowable bevel
- Replacement of concrete sidewalk panel

- Where right-of-way is available, route sidewalk around large trees to avoid further heaving

#### **Surface Condition**

- Replacement of damaged concrete sidewalk panel
- If asphalt surface such as multi-use trail, mill and overlay with new surface
- Maintenance to keep free of vegetation and debris

### **5.6 Obstructions, Protrusions and Utility Considerations**

#### **Requirements:**

Per R402.2, protruding objects are those objects with leading edges more than 27" and not more than 80" above the finish surface which protrude more than 4" horizontally into pedestrian circulation paths.

Per R210, street furniture and other objects may not reduce the minimum clear width of the PAR. These items would be considered an obstruction of the continuous clear width provided.

Obstructions in the Town may include light and utility poles, newspaper and mail boxes, vegetation protrusions, signs, hydrants, and site furnishings. Other barriers include, but are not limited to, manholes, valve covers, open grate castings, and access boxes. These conflicts are generally classified as vertical displacements and slip hazards.

The majority of protrusions noted were due to vegetative overgrowth. Several obstructions identified were due to parked cars overhanging the PAR. Approximately 40% of blocks exhibited some form of obstruction or protrusion.





*Example of obstruction of required 48" minimum clear width by tree*



*Example of obstruction of required 48" minimum clear width by vehicle overhang of adjacent parking*

#### **Addressing the Issue:**

Moveable obstructions may include furniture, signage, parked cars, and even trash collection bins. These items may be addressed by enactment and/or enforcement of ordinances regarding their placement. Implementation of an ordinance restricting parking within public sidewalks may help prevent parking obstructions, particularly in residential areas. Similar restrictions on location of trash bins for pickup could be developed.

Vegetative obstructions (as well as protrusions) can be managed with routine maintenance and by encouraging homeowner participation in maintaining a clear right-of-way.

Fixed obstructions may be costly to address as they generally occur with utilities and may require relocation or purchase of right-of-way from adjacent landowners. For these items, a work-around solution is often preferred. These may include widening a small portion of sidewalk where possible or providing an equivalent alternate route. Less than 5% of blocks had an obstruction of this type.

### **5.7 Overall Compliance**

The statistics above are useful in identifying trends in the deficiencies as a means to prevent them from occurring in new construction. However, the goal of this transition plan is to list the physical barriers in the Town's ROW facilities that limit the accessibility and, therefore, it is necessary to look at each location as a whole to determine overall compliance in order to provide a detailed outline of the methods to be utilized to remove these barriers and make the facilities accessible. All solutions offered address only the criteria indicated. Complete reconstruction may be required where multiple compliance issues are involved. See *Appendix B* for data reports.

### **5.8 Sidewalk Barrier Ranking Analysis**

The Town's self-evaluation of the Public Right-of-Way takes into account factors such as level of use, degree of danger posed, complaints or requests for repair received, and other factors.

These factors can be grouped into two categories. **Contributing contextual factors** account for use patterns and distribution in relation to Town services, residential zones, and public services. **Physical Impedance factors** include the actual physical characteristics of the specific right-of-way feature and the severity of the barrier to use. These categories are further defined in Section 3.3 of this report. Within Appendix A, the sidewalks are ranked by percent defective after

considering the physical impedance factors. See 3.4 information regarding contextual factors.

**Self Evaluation Findings:**

Based on the data collected, a percentage of replacement required was calculated for each data location. This percentage was then applied to the linear footage of that data collection area and multiplied by the approximate cost of sidewalk replacement (in 2013 dollars). Based upon these calculations, the following table illustrates the estimated

value of improvements required to make all sidewalk facilities accessible.

Note that the costs provided do not include costs for ROW purchase, easements, appraisals, etc. and it is very likely that exact costs of the program will vary based on a number of factors. See *Appendix B* for data reports.

<b>Total Low Priority</b>	\$ 117,660
<b>Total Medium Priority</b>	\$ 171,840
<b>Total High Priority</b>	\$ 838,413
<b>Total Sidewalk Improvements</b>	\$ 1,127,913

*Table 5.1. Summary of Sidewalk Costs.*



## 6.0 Self-Evaluation of Pedestrian Facilities with the Public Right-Of-Way – Curb Ramp Inventory

This segment of the self-evaluation plan summarizes the review of current curb ramps within the public ROW. The findings and recommendations contained in this segment will provide the basis for the implementation of specific improvements to accessibility on Town curb ramps.

Approximately 265 data collection locations were evaluated. Of these locations, approximately 70% did not provide a curb ramp or blended transition, but did provide a crossing point. These are considered non-compliant locations and will require complete reconstruction.

### 6.1 Curb Ramp Types

Curb ramps types are classified based on the orientation of the ramp to the adjacent curb. As stated in Advisory R304.1 of the PROWAG, the following types of curb ramps exist:

#### **Perpendicular Curb Ramp**

Perpendicular curb ramps have a running slope that cuts through or is built up to the curb at right angles or meets the gutter break at right angles where the curb is curved.

#### **Parallel Curb Ramp**

Parallel curb ramps have a running slope that is in-line with the direction of sidewalk travel (parallel to the curb) and lower the sidewalk to a level turning space where a turn is made to enter the pedestrian street crossing. Parallel ramps can be useful where ROW is limited to get a pedestrian from street level to the sidewalk in a shorter depth space.

#### **Combination Curb Ramp**

Parallel and perpendicular curb ramps can be combined. A parallel curb ramp is used to lower the sidewalk to a mid-landing and a short perpendicular curb ramp connects the landing to the street. Combination curb ramps can be provided where the sidewalk is at least 6.0 feet

wide and can provide access in situations where the sidewalk is much higher than 6" above the street elevation.

#### **Blended Transition**

Blended transitions are raised pedestrian street crossings, depressed corners, or similar connections between pedestrian access routes at the level of the sidewalk and the level of the pedestrian street crossing that have a grade of 5 percent or less. Blended transitions are suitable for a range of sidewalk conditions

#### **Diagonal Curb Ramp**

Per R207.2, where existing physical constraints prevent compliance with R207.1, a single diagonal curb ramp shall be permitted to serve both pedestrian street crossings.

Diagonal curb ramps are not the preferred method of construction due to lack of directional cues for pedestrians using the crossing and safety concerns created by vehicles misconstruing pedestrian intentions.

### 6.2 Ramp Width

#### **Requirements:**

Per R304.5.1, the clear width of curb ramp runs (excluding any flared sides), blended transitions, and turning spaces shall be 4.0 feet minimum.

#### **Addressing the Issue:**

Ramp width could be limited by adjacent ROW availability, obstructions, or simply have been constructed too narrow to meet current requirements. If unobstructed area is available within the ROW, the ramp can be widened by replacement or addition of pavement. If ROW or an obstruction is a limiting factor, a different ramp configuration may alleviate the problem. If not, the ramp or obstruction may need to be relocated, or inquiries made about obtaining additional ROW.

### 6.3 Ramp Slopes

#### **Requirements:**

Per R304.2.2, the running slope of the curb ramp shall cut through or shall be built up to the curb at right angles or shall meet the gutter grade break at right angles where the curb is curved. The running slope of the curb ramp shall be 5% minimum and 8.3% maximum but shall not require the ramp length to exceed 15 feet. Additionally, the counter slope of the gutter or street at the foot of curb ramp runs, blended transitions, and turning spaces shall be 5 percent maximum.

Per R304.5.3, the cross slope of curb ramps, blended transitions, and turning spaces shall be 2 percent maximum. At pedestrian street crossings without yield or stop control and at midblock pedestrian street crossings, the cross slope shall be permitted to equal the street or highway grade.

Per 304.5.2, grade breaks at the top and bottom of curb ramp runs shall be perpendicular to the direction of the ramp run. Grade breaks shall not be permitted on the surface of ramp runs and turning spaces. Surface slopes that meet at grade breaks shall be flush.

Within the Town, the following slope data was collected:

- Ramp running slopes of greater than the allowable slope of 8.3%.
- Ramp running slopes within the acceptable range of 5% to 8.3%.
- Blended transitions with running slope of less than 5%.

#### **Addressing the Issue:**

Non-compliant ramp slopes can be caused by a number of factors including but not limited to, construction tolerances, design inconsistencies, construction prior to current standards, steep roadway grades, adjacent buildings or obstructions, or limited ROW.

Possible solutions may include:

- Extending the rise of the ramp over a longer run
- Creating a combination ramp
- Increasing slope of adjacent sidewalk panels past the top landing
- Incorporating returned curbs or retaining wall to avoid adjacent obstructions or limited ROW

### 6.4 Flares

#### **Requirements:**

Per R304.2.3, *where a pedestrian circulation path crosses the curb ramp, flared sides shall be sloped 10 percent maximum, measured parallel to the curb line.*

During the self evaluation, it was found that:

- Most locations did not require a flared side. These locations were blended transitions, adjacent to tree lawns, or had returned curbs instead of flares.
- A limited number of locations in the downtown area required two flared sides and exceeded the 10% maximum slope. Distinction is not made whether one or both side flares were out of compliance.
- Some locations required only one flared side and said location exceeded the 10% maximum slope. The opposite side bordered on adjacent tree lawn.

#### **Addressing the Issue:**

Non-compliant flare slopes or configurations can be caused by a number of factors including but not limited to, construction tolerances, design inconsistencies, construction prior to current standards, adjacent buildings or obstructions, or limited ROW.

Possible solutions may include:

- Extending the rise of the flare over an appropriate run
- Using a returned curb instead of flare
- Replacing flare and removing curb as necessary to accommodate corrected flare.



## 6.5 Landings/Turning Spaces

### Requirements:

Per R304.2 and R304.3, a turning space of 4.0 feet minimum by 4.0 feet minimum shall be provided at the top of the curb ramp and shall be permitted to overlap other turning spaces and clear spaces. Where the turning space is constrained at the back-of-sidewalk, the turning space shall be 4.0 feet minimum by 5.0 feet minimum. The 5.0 feet dimension shall be provided in the direction of the ramp run.

Additionally, per R304.5.5, beyond the bottom grade break, a clear space 4.0 feet minimum by 4.0 feet minimum shall be provided within the width of the pedestrian street crossing and wholly outside the parallel vehicle travel lane. For parallel ramps (R304.3), this means at the bottom of the ramp behind the curb line. Diagonal ramps must also accommodate this turning space within the crosswalk and wholly outside the vehicle travel lanes.

Per R304.5.3, the cross slope of curb ramps, blended transitions, and turning spaces shall be 2 percent maximum.

Within the Town, characteristics included:

- Locations met landing slope and size requirements.
- Locations met landing size requirement, but lacked the appropriate landing slopes.
- Locations met slope requirement, but lacked the appropriate landing size.
- Were non-compliant in both landing slope and size.



*Example of compliant flare and top landing between two perpendicular ramps, but is lacking detectable warning.*



*Example of parallel ramp with compliant lower landing/change of direction to enter crosswalk, however DW is not full width.*



*Example of lack of top landing/change of direction for users not crossing the street. Slopes also warp creating potential unstable situation for wheelchair users.*

#### **Addressing the Issue:**

Non-compliant landings can be caused by a number of factors including but not limited to, construction tolerances, design inconsistencies, construction prior to current standards, adjacent buildings or obstructions, or limited ROW.

Possible solutions may include:

- Constructing new landing and turning space adjacent to top of ramp
- Creating a combination ramp to accommodate misaligned landing
- Increasing slope of adjacent sidewalk panels past the top landing
- Replacing blended transition with curb ramp to increase available space for landing
- Incorporating returned curbs or retaining wall to avoid adjacent obstructions or limited ROW

## **6.6 Detectable Warnings**

#### **Requirements:**

Per R208, detectable warnings surfaces indicate the boundary between pedestrian and vehicular routes where there is a flush rather than curbed connection.

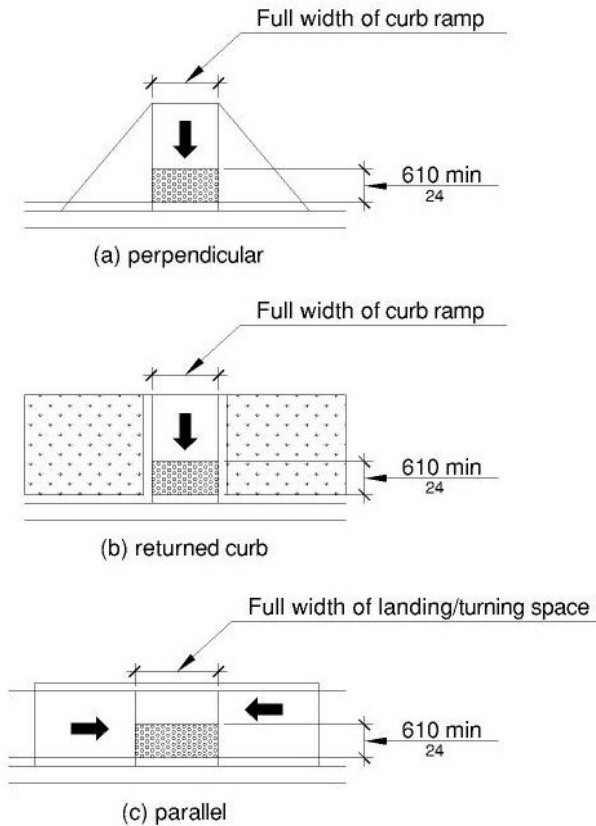
Detectable warning surfaces shall be provided at the following locations:

- Curb ramps and blended transitions at pedestrian street crossings;
- Pedestrian Refuge Islands (unless at street level AND less than 6' in length);
- Pedestrian at-grade rail crossings not located within a street or highway and transit stops (not applicable for Town of LaGrange)

Detectable warnings should not be provided at crossings of residential driveways as the pedestrian ROW continues across residential driveway aprons. They should be provided at high traffic commercial drive ways provided with yield or stop control since these function similarly to roadways, such as those found at large commercial centers.

Per R305.1, Detectable warning surfaces shall extend 2.0 feet minimum in the direction of pedestrian travel. At curb ramps and blended transitions, detectable warning surfaces shall extend the full width of the ramp run (excluding any flared sides), blended transition, or turning space.

Additionally, per Advisory R305.2, some detectable warning products require a concrete border for proper installation. The concrete border should not exceed 2 inches. See Illustration below from the PROWAG regarding placement and dimensions.



**Figure R305.1.4**  
**Size**

Detectable warnings (DW) were only provided at approximately 15 locations. Evaluation of the detectable warnings produced the following characteristics:

- Met criteria for depth and contrasting color, but not span full width.
- Met criteria for width and contrast, but lacked full 24" depth.
- Locations did not provide any detectable warning



*Example of lack of DW at blended transition*



*Example of proper application of detectable warning at blended transition*



*Example of lack of DW at curb ramp. Also example of undesirable grate within the PAR of the adjacent crosswalk (See 6.9)*





*Example of DW that does not extend full width of curb ramp*

#### **Addressing the Issue:**

Retrofit detectable warning kits are available for use on ramps where all other criteria are compliant.

If detectable warning plate does not extend full width or depth, they can be removed and replaced along with any concrete damaged by the operation.

Steel, HDPE, or cast iron products provide greater durability for the truncated domes. Using these products in lieu of a brick or cast concrete panel may minimize plow damage and wear of truncated domes.

### **6.7 Drainage**

#### **Requirements:**

According to the FHWA publication "Designing Sidewalks and Trails for Access", *'poor drainage at the bottom of a curb ramp is inconvenient to all pedestrians. It is a particular nuisance for people who rely on the curb ramp for access and who will, therefore, not be able to avoid the area. When the water eventually dries up, debris, which further impedes access, is usually left at the base of the ramp. In cold-weather locations, water that does not drain away can turn into slush or ice, creating a more hazardous situation'*.

The self-evaluation noted the following:

- Approximately 20% of crossing locations/curb ramps were located within 6' of a drainage structure, indicating potential for a drainage problem during heavy rain events.
- Approximately 15% exhibited evidence of ponding, including buildup of debris and sediment at the foot of the ramp.



*Example of evidence of ponding at ramp and non-compliant grate within crosswalk PAR*

#### **Addressing the Issue:**

Best practices for avoiding drainage issues include locating drainage structures on the uphill side of ramps, locating low points 6' or more from the ramp, 'tabling' the intersection slightly where tying into ramps, designing gutter slopes with continuous flow to carry water past the foot of ramps, eliminating changes in level at the gutter line, and maintaining inlets and gutters to ensure adequate flow during rain events.

### **6.8 Obstructions, Protrusions and Utility Considerations**

#### **Requirements:**

Per R402.2, protruding objects are those objects with leading edges more than 2.25' and not more than 6.7' above the finish surface which protrude more than 4" horizontally into pedestrian circulation paths.

Per R210, street furniture and other objects may not reduce the minimum clear width of the PAR. These items would be considered an obstruction of the continuous clear width provided.

Obstructions that might be observed include light and utility poles, traffic signs, fire hydrants, and utility cabinets. Ground plane utility conflicts, include, but are not limited to, manholes, valve covers, open grate castings, and access boxes. These conflicts were generally classified as vertical displacements and slip hazards.

#### Addressing the Issue:

Fixed obstructions may be costly to address as they generally occur with utilities and may require relocation or purchase of right-of-way from adjacent landowners. For these items, a work-around solution is often preferred. These may include widening a small portion of sidewalk where possible or providing an equivalent alternate route.

### 6.9 Changes in Level / Surface Condition

#### Requirements:

Per R302.7, the surface of the PAR shall be firm, stable, and slip-resistant. Grade breaks shall be flush. Vertical surface discontinuities (changes in level) shall be  $\frac{1}{2}$ " maximum with those between  $\frac{1}{4}$ " and  $\frac{1}{2}$ " being beveled at slope not steeper than 50% across the entire discontinuity. Horizontal openings such as grates and joints may not exceed  $\frac{1}{2}$ ". Elongated openings should be placed perpendicular to dominant direction of travel.

Displacements observed at the gutter line or other ramp joints included:

- Horizontal displacements.
- Vertical displacements.
- Locations did not exhibit any displacements over the required threshold.
- Lack of curb ramp entirely



*Example of non-compliant lip at bottom of curb ramp*

#### Addressing the Issue:

Changes in level and surface condition are a common problem as infrastructure ages. Temporary fixes of high hazard areas can be implemented to promote the safety of all users while long-term solutions are set into action. Public input is particularly important in locating hazardous areas as they occur. In general, the following solutions can address changes in level and surface condition.

#### Level Changes

- Temporary placement of concrete or asphalt to ramp from adjacent surface
- Grinding edge at surface changes of up to  $\frac{1}{2}$ " to achieve allowable bevel
- Replacement of ramp panel or gutter

#### Surface Condition

- Replacement of damaged ramp panel
- Maintenance to keep free of vegetation and debris
- Avoid inclusion of depressed grooves in future projects to limit freeze/thaw and debris problems associated with the grooves.

### 6.10 Overall Compliance

The statistics above are useful in identifying trends in the deficiencies as a means to prevent them from occurring in new construction. However, the goal of this transition plan is to list



the physical barriers in the Town's ROW facilities that limit the accessibility and, therefore, it is necessary to look at each location as a whole to determine overall compliance in order to provide a detailed outline of the methods to be utilized to remove these barriers and make the facilities accessible. All solutions offered address only the criteria indicated. Complete reconstruction may be required where multiple compliance issues are involved.

The extent of reconstruction required for existing ramps and blended transitions varies widely. Some locations may require simple fixes such as replacing or installing tactile warnings or replacement of a non-compliant flare. Some locations will require complete reconstruction. Each location will require thorough examination in order to design the correct solution to its unique situation. Locations without a curb ramp provided constitute the greatest barrier to use and require full replacement.

### 6.11 Curb Ramp Barrier Analysis

The Town's self-evaluation of the ROW takes into account factors such as level of use,

degree of danger posed, complaints or requests for repair received, and other factors.

These factors can be grouped into two categories. **Contributing contextual factors** account for use patterns and distribution in relation to Town services, residential zones, and public services. **Physical Impedance factors** include the actual physical characteristics of the specific right-of-way feature and the severity of the barrier to use. These categories are further defined in this report. Within Appendix B, the curb ramps are ranked as Compliant, Low Priority, Medium Priority, and High Priority after considering the physical impedance factors. See information regarding contextual factors in Section 4.

In addition, the methodology used for estimating costs of corrections included dividing all curb ramps into cost groups based on amount of rework required. Note that the costs provided below do not include costs for ROW purchase, easements, appraisals, etc. and it is very likely that exact costs of the program will vary based on a number of factors. See *Appendix B* for data reports.

Total Low Priority	\$ 54,100
Total Medium Priority	\$ 55,300
Total High Priority	\$ 321,600
<b>Total Curb Ramp Improvements</b>	<b>\$ 431,000</b>

*Table 6.1. Summary of Curb Ramp Costs.*

## 7.0 Transition Plan

The Transition Plan describes how the Town will be transitioning to compliance with the ADA. Public entities, like the Town of LaGrange, are required to provide access to Town programs, services and activities for all of the recipients. Thus, the Town must provide access for individuals with disabilities and document areas of noncompliance. Additional documentation is provided as barriers are removed.

If structural changes are identified to provide program accessibility as part of the self-evaluation, ADA identifies specific elements to be included in the transition plan. At a minimum, the elements of the Transition Plan are:

- 1) A list of the physical barriers in the Town's facilities that limit the accessibility of its programs, activities, or services to individuals with disabilities [\[28 CFR 35.150 \(d\)\(3\)\(i\)\]](#)
- 2) A detailed outline of the methods to be utilized to remove these barriers and make the facilities accessible [\[28 CFR 35.150 \(d\)\(3\)\(ii\)\]](#)
- 3) The schedule for taking the necessary steps to achieve compliance with Title II of the ADA. If the time period for achieving compliance is longer than one year, the plan should identify the interim steps that will be taken during each year of the transition period [\[28 CFR 35.150 \(d\)\(3\)\(iii\)\]](#)
- 4) The name of the official responsible for the plan's implementation. [\[28 CFR 35.150 \(d\)\(3\)\(iv\)\]](#)

The transition plan is a reaction to the findings of the facility audits, assessments of Town policies, services, programs, and activities, and input from advocacy groups. Recommended actions for Town policies and programs can be found in Section 3.0.

The specific architectural and site improvement modifications required to make programs accessible are listed in the Town of LaGrange, Facility-Physical Barrier and Right-of-Way

Reports (see *Appendices A and B*). Facilities reports include buildings, interior spaces, parking lots, and their related grounds. Each facility report contains a list of architectural barriers and barrier removal actions. Not all of these barriers must be removed in order to provide program compliance with the ADA. Removing barriers limiting access to programs or those which present a safety hazard should be the Town's first priority.

Section 7.4 of the transition plan focuses pedestrian facilities within Town right-of-way and how to bring some facilities into compliance. Right-of-way facilities within the Town's area of responsibility include curb ramps, sidewalks, crosswalks and on-street parking.

An overall summary of the cost of improvements for all Town-Owned facilities is in Table 1 at the end of this section.

### 7.1 Phasing of Corrections

A phased implementation of the required corrections to remove physical barriers at Town-owned facilities is required and recommended. The Town has limited funds and cannot immediately make all facilities fully accessible. Prior to setting priorities, baseline criteria needed to be established to develop a starting point for ranking the deficient facilities identified during the self-evaluation.

Site priorities were determined by evaluating each site's level of use, social need, civic function, and the general uniqueness of the site. At the time of the development of this report, no public complaints have been received about Town-owned facilities. Future complaints could be received and facility uses may change, which may be a factor in how remedies to physical barriers are prioritizing and funding is allocated for improvements.

Each of these criteria is assumed to have equal weight and no priority over another:

- **Level of Use:** Is the facility utilized quite frequently and by a large cross-section of the public?
- **Social Need:** Does the facility provide a social service or program for less fortunate or transient citizens?
- **Civic Function:** Does the facility provide access to civic programs and services that implement the civil and political rights provided by the government.
- **General Uniqueness of the Site:** Does the building, facility, or site provide a distinct program or service that cannot occur at a different location or facility?

## **7.2 Public Outreach**

Public participation on the final contents of the Transition Plan, including setting of priorities and the phasing of improvements, is critical to the success of the endeavor and is required by law. A draft Transition Plan was made available at the Clerk-Treasurer's Office and Public Library for public review and comment. The public comments were incorporated in the final report. The final Transition Plan was then submitted to the Town for adoption at its regular Town Council meeting on November 4, 2013

In creating priorities, it is the Town's intent to evaluate all areas of potential deficiency, and to make structural changes where necessary and where equal accommodation cannot be made in another manner. The assignment of priorities is intended to facilitate public review and to address specific concerns of the local disabled community. It must be emphasized that it is the Town's intention that all individuals with all types of disabilities be reasonably accommodated.

The timing of the improvements by site within each transition phase will be determined by the Town based on their preferences and criteria. In general, the required physical improvements to meet ADA specifications at Town facilities were split into three priority groups:

- High priority improvements
- Medium priority improvements

- Low priority improvements

## **7.3 Priorities for Barrier Removal**

All barriers are not equal in the impact they have on persons with disabilities to have equal access to Town facilities or programs. Following evaluation of all facilities and programs, a prioritization had to be done to identify a ranking system to utilize when determining which capital improvements need to be considered first and those that could be implemented in subsequent years.

1. **High priority** barriers prohibit access for disabled persons, make access extremely troublesome, or present safety hazards to all users. These barriers likely do not have acceptable alternative routes or treatments to overcome the barrier. Typically these barriers are significant obstacles located at entry walks and doors, interior corridors, curb ramps, rest rooms, and transaction and information counters. Examples of high priority barriers would include:
  - service counter height
  - non-compliant doors
  - extremely non-compliant slopes for accessible routes or ramps
  - protruding objects
  - displacements in walks or high thresholds
  - missing handrails or grab bars
  - some signage
  - lack of or deficient barrier-free parking
  - extremely non-compliant dimensional issues (narrow doors, corridors, etc.)
2. **Medium priority** barriers partially prohibit access or make access quite difficult for disabled persons. For medium priority barriers, alternative routes or treatments to overcome the barrier may or may not exist. Typically these barriers are obstacles to amenities such as secondary entry points, light switches, vending machines, and drinking fountains. Medium priority barriers may also be barriers which are significant obstacles prohibiting access but for which alternative access is available or assistance is readily available to navigate around the

barrier. The presence of the medium priority barrier possibly causes a minor danger to a disabled person who is attempting to use the facility. Examples of medium priority barriers would include:

- minor non-compliant slopes
- some signage
- minor issues with doors
- stairwell/stair issues, particularly where an elevator provides an alternate route.
- restroom fixture issues
- moderately non-compliant dimensional issues

3. **Low priority** barriers typically do not limit access to facilities or services for disabled persons. For low priority barriers, alternative routes or treatments are typically available or assistance can be provided to overcome the barrier. It is not likely that the presence of a low priority barrier would cause a danger to a disabled person who is attempting to use or access the facility. Examples of low priority barriers would include:

- many signage issues
- minor issues with light switches, electrical outlets, etc.
- minor non-compliant dimensional issues

The costs to remove barriers by priority for each site are shown in Table 1 and detailed for each facility in *Appendix A*. In addition, a time frame had to be identified to determine an average annual budget to consider. For the purposes of this report, a 10 year time frame was utilized for the facilities. Using this, it is conceivable that at the end of 10 years, all non-compliant ADA issues would be addressed throughout all Town-owned facilities. Based on the site surveys, a total of approximately \$98,295 for site facilities would result in an annual budget for accessibility improvements of \$10,000. This assumes that standards and guidelines are not modified. This further assumes that funding is available each budget cycle to make the necessary improvements. It is highly unlikely given unforeseen fluctuations in the economy that this is realistic, particularly when considering that there are also likely to be a

large number of costly improvements required within the public ROW.

In some instances, it may be advantageous to construct all improvements at a site at once rather than correct the high priority barriers first and come back at a later date to correct the medium or low priority barriers. For some sites, the total cost of construction for the corrections requires that they be spread out over two phases. The Town of LaGrange has the right to modify the priorities based on funding levels and changes in Town programs activities and services, to have flexibility in accommodating community requests and complaints. Interim resolutions, such as assigning aids, temporary signing for alternate routes or sites, and modifications of programs, activities, and services may be implemented at the Town's discretion to handle existing insufficiencies or access complaints received. All costs noted on *Appendix A* and Table 1 are 2013 estimates and subject to change based on market conditions, economic conditions, inflation, material selection, etc. These costs do not include any costs associated with training of staff, staff time related to training or overseeing implementation, etc.

Actual phasing, transitioning of improvements, etc. can be impacted by a number of factors that may be unknown currently, as well as economic conditions, grant opportunities, etc. The Town is committed to becoming ADA compliant within the confines of preserving existing programs and services to all and budgetary limitations.

#### **7.4 Public Right-Of-Way**

The Town's right-of-way facilities and policies related to them are described in Section 3.19, Section 4, 5, 6, and Appendix B. The costs to remove barriers by priority are shown in Tables within Sections 5 and 6.

Within a typical municipality budget, the cost of making these improvements within a specified time frame and with the current economy can be overwhelming. Due to the magnitude of estimated construction costs to modify these

existing pedestrian facilities, and typically life-cycles of said facilities, such improvements will be on-going rather than having a specific completion date. Approximately \$1,564,893 in right-of-way improvements would be required (2013 costs) to achieve ADA compliance within the Town ROW. They have set a goal of \$30,000 per year. To help provide these funds, the Town will investigate grant options for which the community may qualify. It is also recommended to implement a cost share program with homeowners to encourage improvements and minimize costs for all parties.

This yearly allowance will be allocated first to high priority areas providing the greatest access benefit to buildings such as schools, government offices churches and other major public centers. The study found that lack of a curb ramp at a high percentage of locations is one of the largest barriers to use. The Town has suggested replacement of curb ramps be a priority over sidewalk replacements as this renders sidewalks inaccessible. This may also allow time for development of a sidewalk program and long term strategies for maintaining said sidewalk network.

A key component to ensuring ROW facilities remain usable, whether they are fully compliant with PROWAG or not, is to perform required maintenance activities in a manner that does not reduce accessibility. This maintenance can be performed by adjacent property owners, contractors, or Town staff and should be ongoing. Examples of maintenance activities that may be required within the public ROW include:

- Vegetation – proper maintenance of grass, landscaping, shrubs, and trees adjacent to the PAR is vital to ensuring compliance with the standards. Over time, sod can grow over the sidewalk and not only reduce the width of the PAR to less than 48", but also prevent proper drainage. Taller vegetation can grow into the PAR, creating an obstruction and/or protrusion
- Snow and Ice Removal – snow and ice accumulation along sidewalks, curb ramps, and on-street parking presents a barrier to many persons with disabilities and a potential safety hazard to all users. The prompt removal of snow for the full width of the sidewalk following a storm is vital to ensuring that pedestrians can use the sidewalk and not have to use the streets. Delays in removing the snow or not removing the full width of the sidewalk can significantly impact the ability of all users to utilize sidewalks. Not clearing accessible parking spaces and access aisles makes it extremely difficult for persons with disabilities to get from their vehicles to the PAR.
- Obstructions and Protrusions – when utility poles, signs, and other objects are replaced, it is important to make sure that they are moved out of the PAR to the greatest extent possible and obstructions and protrusions are eventually eliminated. Items such as utility poles, hydrants, street signs, mailboxes, etc. can all be relocated as part of regular maintenance activities.
- Level Changes – displacement of surfaces from an adjacent surface creates trips hazards to all users. The causes of these level changes vary and short term fixes can be considered until such time as a sidewalk project is completed. Minor level variances can either be beveled or grinded level. More severe elevation changes may require something more extreme, such as temporary patching material being placed to remove a vertical level change.



- Temporary Signage – consideration could be given to putting temporary signage at PARs that could present significant barriers to persons with disabilities. These signs should be located as close to an intersection as possible and identify an alternate route that does not have the same significant issues.

## 7.5 Transition Plan Implementation

Determination of yearly scope of improvements should include the physical barrier prioritization, consideration of contributing contextual factors and high traffic areas, as well as planned infrastructure improvements. In some instances, it may be advantageous to construct improvements at a location where adjacent ROW work has been deemed necessary (such as planned intersection or street improvements) rather than correct individual locations on their own. However, it is recommended that those items noted as safety hazards be addressed individually where needed for the safety of all citizens.

The number and size of these projects will largely be dependent on a number of economic factors and future changes to the ADA Accessibility Guidelines (ADAAG), the Proposed Accessibility Guidelines for Pedestrian Facilities within the Public Right of Way, or other unforeseen requirements that may necessitate additional improvements to Town facilities.

Complaints received may also help determine the priorities of the improvements. If the Town receives complaints about access at a particular site that is not slated for upgrades for several years, they should adjust the Transition Plan to accommodate the implementation of improvements to be sooner or as necessary.

The Town of LaGrange has the right to modify the priorities based on funding levels and changes in Town programs activities and services, to have flexibility in accommodating community requests and complaints. Interim

resolutions, such as temporary signing for alternate routes or sites, and temporary repairs may be implemented at the Town's discretion to handle existing insufficiencies or access complaints received.

Any changes to the ADA policy after the sites were surveyed are not reflected in these basic cost estimates. Additionally, it is the Town's responsibility, as required by the ADA mandate, to regularly update the Transition Plan based on the latest requirements of the ADA laws and to document constructed improvements and facilities that are brought up to current ADA standards. Finally, the site surveys performed for this report are not to design level detail and are intended to be used to give a framework to the Transition Plan. When the Transition Plan is approved and the planning stages are begun for the first improvements, a more detailed survey of each site should be performed and improvements should be designed by licensed professionals that are compliant with ADA as well as all other applicable codes, including building and fire codes. At this time, costs are estimated but precise costs cannot be determined and the Transition Plan should be adjusted to reflect this knowledge.

## 7.6 Plan Updates and Enforcement

Changes to the Town of LaGrange's policies and programs should be drafted, implemented, and documented by the ADA Coordinator. Examples of some of these changes were provided in the Self-Evaluation. These changes should have little cost of implementation, mainly consisting of the time to develop the language of the policy and program changes, time to train Town staff, and administrative costs. Some of the suggested language for Town ADA documentation has been suggested in this report, but these suggestions are not exhaustive.

It is recommended that all improvements related to accessibility be documented annually as they are completed to enable a review of improved areas and to prioritize future work.

Table 7.1 – Cost Summary

TOWN OF LAGRANGE - ADA SELF EVALUATION STUDY AND TRANSITION PLAN					
FACILITY SUMMARY					
Facility Name & Location	Ownership Status	Low Priority	Medium Priority	High Priority	Total Site Cost
Town Hall 1201 N. Townline	City	\$5,550	\$480	\$760	\$6,790
Fire Department 1201 N. Townline	City	\$1,690	\$200	\$7,890	\$9,780
Police Department 1201 N. Townline	City	\$2,005	\$450	\$310	\$2,765
Greenwood Cemetery Detroit St./SR 9	City	\$840	\$28,750	\$5,750	\$35,340
Town Park Steuben and Mountain	City	\$23,770	\$11,450	\$7,900	\$43,120
Public Parking Lot Michigan and Poplar	City	\$0	\$500	\$0	\$500
<b>TOTALS</b>		<b>Low Priority \$33,855</b>	<b>Medium Priority \$41,830</b>	<b>High Priority \$22,610</b>	<b>Total Cost \$98,295</b>
PUBLIC RIGHT-OF-WAY SUMMARY					
Facility Type		Low Priority	Medium Priority	High Priority	Total Cost
On Street Parking		\$2,540	\$2,170	\$1,270	\$5,980
Curb Ramps		\$54,100	\$55,300	\$321,600	\$431,000
Sidewalks		\$117,660	\$171,840	\$838,413	\$1,127,913
<b>TOTALS</b>		<b>Low Priority \$174,300</b>	<b>Medium Priority \$229,310</b>	<b>High Priority \$1,161,283</b>	<b>Total Cost \$1,564,893</b>
<b>Total Improvement Cost</b>					<b>\$1,663,188</b>

## 8.0 ADA Tool Kit

### 8.1 Introduction

In order to facilitate access to all Town programs and Departments, the Town will maintain program accessibility guidelines, standards and resources. This information is available to all employees and volunteers. The Town will add to these guidelines when necessary to address its needs and include information and technological devices that help staff and volunteers members communicate with individuals with a variety of disabilities. The Town will periodically review the components of this section, as new technologies are developed in order to ensure that the best types of modifications are included. This section also contains the accessibility standards of care that govern new construction and alterations to facilities.

If you need any additional assistance, please contact:

Mark Eagleson, ADA Coordinator  
Phone: (260) 463-3241  
E-mail: [meagleson@townoflagrange.in.gov](mailto:meagleson@townoflagrange.in.gov)

### 8.2 Federal Accessibility Standards and Regulations

#### U.S. Department of Justice

The U.S. DOJ provides many free ADA materials including the ADA text. Printed materials may be ordered by calling the ADA Information Line [(800) 514-0301 (Voice) or (800) 514-0383 (TDD)]. Publications are available in standard print as well as large print, audiotape, Braille, and computer disk for people with disabilities. Documents, including the following publications, can also be downloaded from the DOJ website ([www.ada.gov/](http://www.ada.gov/)).

Unless noted, the ADA publications have not been updated to reflect the recent revisions to the ADA regulations that took effect on March 15, 2011.

- *ADA Regulation for Title II*. This publication ([http://www.ada.gov/regs2010/ADAregs2010.htm#titleII final 2010](http://www.ada.gov/regs2010/ADAregs2010.htm#titleII%20final%202010)) describes Title II of the ADA, Pub. L. 101-336, which prohibits discrimination on the basis of disability by public entities. Title II of the ADA protects qualified individuals with disabilities from discrimination on the basis of disability in the services, programs, or activities of all state and local governments. 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 qualified individual with a disability, and establishes a complaint mechanism for resolving allegations of discrimination.
- *Title II Technical Assistance Manual (1993) and Supplements*. This 56-page manual ([www.ada.gov/taman2.html](http://www.ada.gov/taman2.html)) explains in lay terms what state and local governments must do to ensure that their services, programs, and activities are provided to the public in a nondiscriminatory manner. Many examples are provided for practical guidance.
- *Accessibility of State and Local Government Websites to People with Disabilities*. This is a 5-page publication providing guidance ([www.ada.gov/websites2.htm](http://www.ada.gov/websites2.htm)) on making state and local government websites accessible

#### U.S. Access Board

The full texts of Federal laws and regulations that provide the guidelines for the design of accessible facilities and programs are available from the U.S. Access Board. Single copies of publications are available free and can be downloaded from the Access Board's website

([www.access-board.gov/the-board/laws](http://www.access-board.gov/the-board/laws)). In addition to regular print, publications are available in large print, disk, audiocassette, and Braille. Multiple copies of publications can be ordered by sending a request to [pubs@access-board.gov](mailto:pubs@access-board.gov). In addition to the guidelines, guidance material is also available to assist staff in understanding and implementing Federal accessibility guidelines.

The following publications are currently available from the U.S. Access Board.

### Guidelines and Standards for Facilities

Federal guidelines and standards are subject to periodic revision based on research findings and guidance from advisory committees. The County should have a regular practice of reviewing research materials posted to the U.S. Access Board's website and updating local guidelines and practices as new standards are adopted or existing standards are revised.

- *ADA Standards for Accessible Design* (ADASAD). This document ([www.ada.gov/2010ADASTandards\\_index.htm](http://www.ada.gov/2010ADASTandards_index.htm)) contains scoping and technical requirements for accessibility to buildings and facilities by individuals with disabilities under the ADA, including special provisions where applicable for elements designed specifically for children ages 12 and under. 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 DOJ and the DOT, under the ADA.
- *Accessibility Guidelines for Play Areas*. The Access Board has developed accessibility guidelines for newly constructed and altered play areas. This bulletin is designed to assist in using the play area accessibility guidelines and provides information regarding where the play area guidelines apply, what a play component is considered to be, how many play components must be an accessible route, and the requirements for accessible routes within play areas.

([www.access-board.gov/guidelines-and-standards/recreation-facilities/guides/play-areas](http://www.access-board.gov/guidelines-and-standards/recreation-facilities/guides/play-areas))

- *Accessibility Guidelines for Recreation Facilities*. The Access Board issued accessibility guidelines for newly constructed and altered recreation facilities in 2002. The recreation facility guidelines are a supplement to ADAAG. They cover the following facilities and elements: amusement rides, boating facilities, fishing piers and platforms, miniature golf courses, golf courses, exercise equipment, bowling lanes, shooting facilities, swimming pools, wading pools, and spas. These summaries were updated following issuance of ADASAD ([www.access-board.gov/guidelines-and-standards/recreation-facilities/guides](http://www.access-board.gov/guidelines-and-standards/recreation-facilities/guides))
- *Accessibility Guidelines for Outdoor Developed Areas*. The Regulatory Negotiation Committee on Accessibility Guidelines for Outdoor Developed Areas was established in June 1997. The accessibility guidelines proposed by the Committee include consideration of the latest information, design, and construction practices in existence. Proposed Section 16 of ADAAG requires all areas of newly designed or newly constructed and altered portions of existing trails connecting to designated trailheads or accessible trails to comply with this section. This proposed section also provides design guidelines for all newly constructed and altered camping facilities, picnic areas, and beach access routes. It is recognized that compliance with this section will not always result in facilities that will be accessible to all persons with disabilities. These guidelines recognize that often the natural environment will prevent full compliance with certain technical provisions, which are outlined in this publication ([www.access-board.gov/guidelines-and-standards/recreation-facilities/outdoor-developed-areas/draft-final-guidelines/text-of-the-guidelines](http://www.access-board.gov/guidelines-and-standards/recreation-facilities/outdoor-developed-areas/draft-final-guidelines/text-of-the-guidelines)).

## Guidance Material and Advisory Reports for Facilities

The following publications provide additional information on specific aspects of the above guidelines and standards for facilities. Employees are encouraged to refer to these publications to obtain more detailed and up-to-date information when evaluating and implementing accessibility improvements to facilities. Note that several websites have been reconfigured and some outdated information removed. Some web addresses or hyperlinks may not be functional and not all information contained in the documents references current standards.

- *Using ADAAG Technical Bulletin.* This bulletin was developed to serve the specific needs of architects and other design professionals who must apply the ADAAG to new construction and alterations projects covered by Titles II and III of the ADA. It is also intended to clarify accessibility regulations generally, including those that apply to existing facilities covered by the ADA.
- *Detectable Warnings Update (March 2008).* Currently, the Access Board is in the process of developing guidelines on public rights-of-ways that, once finalized, will supplement the new ADAAG. This update is expected in 2013. While ADAAG covers various features common to public streets and sidewalks, such as curb ramps and crosswalks, further guidance is necessary to address conditions unique to public rights-of-way. Constraints posed by space limitations at sidewalks, roadway design practices, slope, and terrain raise valid questions on how and to what extent access can be achieved. Guidance on providing access for blind pedestrians at street crossings is also considered essential. This bulletin outlines the requirements of detectable warnings, a distinctive surface pattern of domes detectable by cane or underfoot, which are used to alert people with vision impairments of their approach to streets and hazardous drop-offs. The ADAAG require these warnings on the

surface of curb ramps, which remove a tactile cue otherwise provided by curb faces, and at other areas where pedestrian ways blend with vehicular ways. They are also required along the edges of boarding platforms in transit facilities and the perimeter of reflecting pools. ([www.access-board.gov/guidelines-and-standards/streets-sidewalks/public-rights-of-way/guidance-and-research/detectable-warnings-update](http://www.access-board.gov/guidelines-and-standards/streets-sidewalks/public-rights-of-way/guidance-and-research/detectable-warnings-update))

- *Assistive Listening Systems Technical Bulletins.* Assistive listening systems are devices designed to help people with hearing loss improve their auditory access in difficult and large-area listening situations. Typically, these devices are used in such venues as movie houses, theaters, auditoriums, convention centers, and stadiums, where they are piggybacked on a public address system. They may also be used in smaller listening locations like courtrooms, museums, classrooms, and community centers. This web site provides information about the types of systems that are currently available and tips on choosing the appropriate systems for different types of applications ([www.michdhh.org/assistive\\_devices/hearing\\_assistive\\_tech.html](http://www.michdhh.org/assistive_devices/hearing_assistive_tech.html)).

## Guidelines for Transportation

- *ADAAG for Transportation Vehicles.* This publication provides minimum guidelines and requirements for accessibility standards for transportation vehicles required to be accessible by the ADA, including over-the-road bus and tram systems. ([www.access-board.gov/guidelines-and-standards/transportation/vehicles/adaag-for-transportation-vehicles](http://www.access-board.gov/guidelines-and-standards/transportation/vehicles/adaag-for-transportation-vehicles)).
- *ADAAG for Transportation Vehicles; Over-the-Road Buses.* This publication outlines the amendments to the accessibility guidelines for over-the-road buses (OTRB) made by the Architectural and Transportation Barriers Compliance Board and the DOT to include scoping and technical provisions for lifts, ramps,



wheelchair securing devices, and moveable aisle armrests. Revisions to the specifications for doors and lighting are also adopted. The specifications describe the design features that an OTRB must have to be readily accessible to and usable by persons who use wheelchairs or other mobility aids. ([www.access-board.gov/guidelines-and-standards/transportation/vehicles/technical-assistance-manuals-on-adaag-for-transportation-vehicles/subpart-g-over-the-road-buses-and-systems](http://www.access-board.gov/guidelines-and-standards/transportation/vehicles/technical-assistance-manuals-on-adaag-for-transportation-vehicles/subpart-g-over-the-road-buses-and-systems))

- *American Association of State Highway and Transportation Officials (AASHTO)*. AASHTO is the organization that maintains the "Green Book" for design of roads and highways and has begun to address accessibility of pedestrian networks. Several AASHTO publications, which can be ordered from the AASHTO website (<http://transportation.org/>), address accessible circulation systems, including: *AASHTO Guide for the Planning, Design, and Operation of Pedestrian Facilities* (1<sup>st</sup> edition) and *Guide for the Development of Bicycle Facilities* (3<sup>rd</sup> edition).
- *Federal Transit Administration (FTA)*. FTA regulates and enforces requirements of the ADA covering transportation facilities and systems. FTA maintains a technical assistance line on ADA questions (888-446-4511) and on their website ([www.fta.dot.gov](http://www.fta.dot.gov)).
- *Securement of Wheelchairs and Other Mobility Aids*. As a public or private transit authority, the responsibility of safe, efficient service from public agencies who offer transportation services has been enlarged to affording ridership to people using a wide variety of mobility aids. In considering not only the many types of mobility aid devices, but also the variety and sizes of lifts, and the numerous makes of buses and vans, it can be easily seen that there is no single, definitive solution to accessibility on mass transit vehicles. Various publications can be found that report on the experience of transit

agencies that have taken the initiative to involve the ridership in needs assessment and have established policies, educated operators, and informed the public to achieve greater accessibility in their bus transit systems.

### Guidance Material for Communication

- *Standards for Electronic and Information Technology*. The Access Board is issuing final accessibility standards for electronic and information technology covered by Section 508 of the Rehabilitation Act Amendments of 1998. Section 508 requires the Access Board to publish standards setting forth a definition of electronic and information technology and the technical and functional performance criteria necessary for such technology to comply with section 508. ([www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-section-508-standards/section-508-standards](http://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-section-508-standards/section-508-standards))
- Section 508 also requires that individuals with disabilities, who are members of the public seeking information or services from a Federal agency, have access to and use of information and data that is comparable to that provided to the public who are not individuals with disabilities, unless an undue burden would be imposed on the agency. ([www.section508.gov/](http://www.section508.gov/))
- *Bulletin on the Telecommunications Act Accessibility Guidelines*. As technology continues to improve our means of telecommunication, it can pose challenges to accessibility on one hand, while on the other hold the key to innovative access solutions. Section 255 of the Telecommunications Act requires telecommunications products and services to be accessible to people with disabilities. This is required to the extent access is "readily achievable," meaning easily accomplishable, without much difficulty or expense. Telecommunications products covered include: wired and wireless

telecommunication devices, such as telephones (including pay phones and cellular phones), pagers, and fax machines; other products that have a telecommunication service capability, such as computers with modems, and equipment that carriers use to provide services, such as a phone company's switching equipment. ([www.access-board.gov/the-board/laws/telecommunications-act](http://www.access-board.gov/the-board/laws/telecommunications-act))

Federal guidelines and standards are subject to periodic revision based on research findings and guidance from advisory committees. The County should have a regular practice of reviewing research materials posted to the U.S. Access Board's website and updating local guidelines and practices as new standards are adopted or existing standards are revised.

### 8.3 Resources for Providing Accessible Programs & Facilities

- *ADA Document Portal:* This website (<http://adata.org/ada-document-portal>) provides links to more than 7,400 documents on a wide range of ADA topics. The ADA Document Portal is supported by the 10 ADA & IT Technical Assistance Centers.
- *DisabilityInfo.Gov:* A one-stop interagency portal for information on Federal programs, services, and resources for people with disabilities, their families, employers, service providers, and other community members.
- *National Center on Accessibility (NCA):* The Center ([www.ncaonline.org/](http://www.ncaonline.org/)) is a cooperative effort between the National Park Service (NPS) and Indiana University to provide information and technical assistance, primarily on recreation access. An example of the research activities of the NCA is the National Trails Surface Study. Initiated in 2005, this longitudinal study is primarily the result of questions that the National Center on Accessibility has, for many years and continues to receive from organizations, agencies and individuals who

desire to make their trails accessible; are interested in an unobtrusive surface that blends and is friendly to the environment; and provides a quality trail experience for people with and without disabilities.

- *National Center on Physical Activity and Disability:* The Center ([www.ncpad.org](http://www.ncpad.org)) provides information and resources on physical activity to help people with disabilities find ways to become more active and healthy. The Center also provides information on how to provide access to fitness centers, schools, recreation facilities, camps, and health and leisure services.
- *National Park Service:* NPS has many programs that address the issue of providing accessible recreation services to people with disabilities. These include Wilderness Accessibility for People with Disabilities ([www.ncd.gov/publications/1992/December1992#8-1a](http://www.ncd.gov/publications/1992/December1992#8-1a)) and Director's Order #42-Accessibility, which establishes the purpose and role of the NPS Accessibility Program ([www.nps.gov/accessibility.htm](http://www.nps.gov/accessibility.htm)), lists applicable laws, standards, and authorities, implementation strategies, roles, and responsibilities. It also addresses NPS policies and provides links to additional information sources.

### 8.4 Technical Resources

The Town should utilize the many disability-related resources available through the internet. Begin at AbleData ([www.abledata.com](http://www.abledata.com)), maintained by the National Institute on Disability and Rehabilitation Research of the U.S. Department of Education. The site provides up-to-date links to assistive technologies and disability-related resources. AbleData's mission is to provide objective information on such assistive products as:

- *Architectural elements:* Products that make the built environment more accessible, including indoor and outdoor architectural elements, vertical lifts, lighting, and signs.
- *Blind and low vision:* Products for people with visual disabilities, including computers,

educational aids, information storage, kitchen aids, labeling, magnification, office equipment, orientation and mobility, reading, recreation, sensors, telephones, tools, travel, typing, and writing (Braille).

- **Communication:** Products to help people with disabilities related to speech, writing and other methods of communication, including alternative and augmentative communication, signal systems, telephones, typing, and writing.
- **Computers:** Products to allow people with disabilities to use desktop and laptop computers and other kinds of information technology including software, hardware, and computer accessories.
- **Controls:** Products that provide people with disabilities with the ability to start, stop, or adjust electric or electronic devices including environmental controls and control switches.
- **Deaf and hard of hearing:** Products for people with hearing disabilities, including amplification, recreational electronics, signal switches, and telephones.
- **Deaf and blind:** Products for people who are both deaf and blind.
- **Education:** Products to provide people with disabilities with access to educational materials and instruction in school and in other learning environments including classroom and instructional materials.
- **Recreation:** Products to assist people with disabilities with their leisure and athletic activities including crafts, electronics, gardening, music, photography, and sports.
- **Seating:** Products that assist people to sit comfortably and safely including seating systems and therapeutic seats.
- **Transportation:** Products to enable people with disabilities to drive or ride in cars, vans, trucks and buses including mass transit vehicles and facilities and vehicle accessories.
- **Wheeled mobility:** Products and accessories that enable people with mobility disabilities to move freely indoors and outdoors including wheelchairs (manual, sport, and powered), wheelchair alternatives

(scooters), wheelchair accessories, and carts.

- **Workplace:** Products to aid people with disabilities at work including agricultural equipment, office equipment, tools, and work stations.

### Assistive Technology Vendors and Service Providers

- **International Commission on Technology and Accessibility**

Initiates, facilitates, and provides information regarding technology and accessibility through the internet. This information is available to people with disability, advocates, and professionals in the field of disability, researchers, legislative bodies, and the general community. ([www.riglobal.org/about/government-structure/commissions/icta-international-commission-on-technology-and-accessibility/](http://www.riglobal.org/about/government-structure/commissions/icta-international-commission-on-technology-and-accessibility/))

- **National Center for Accessible Media**

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. NCAM has developed an authoring tool to make web- and CD-ROM-based multimedia materials accessible to persons with disabilities. Called Media Access Generator (MAGpie, versions 1.0 and 2.01) create captions and audio descriptions of rich media and can be downloaded on their website ([ncam.wgbh.org](http://ncam.wgbh.org)).

- **American Sign Language Interpreters**

A pool of on-call American Sign Language interpreters should be developed. This list should be routinely updated to ensure their availability. Some programs may need to have a pool of interpreters who are available on a 24-hour basis to handle emergency procedures. The required qualifications of these interpreters should be established. Many non-certified interpreters provided by local services may have excellent skills and be qualified to handle

most circumstances. However, unique circumstances, such as the provision of emergency medical services, may require interpreters who are approved by the courts and can ensure a level of confidentiality. Resources and contacts for qualified sign language interpreters and information for the deaf and hard of hearing are at the following locations:

- Deaf & Hard of Hearing Services (DHHS), Division of Disability & Rehabilitative Services (DDRS)  
402 W. Washington St., Rm. W453  
P.O. Box 7083  
Indianapolis, IN 46207-7082  
1-800-545-7763  
[DHSHSHelp@fssa.IN.gov](mailto:DHSHSHelp@fssa.IN.gov)  
[www.in.gov/fssa/ddrs/2637.htm](http://www.in.gov/fssa/ddrs/2637.htm)
- American Sign Language Interpreter Network - [www.aslnetwork.com/](http://www.aslnetwork.com/)
- Registry of Interpreters for the Deaf – [www.rid.org/](http://www.rid.org/)
- **Assistive Listening Systems and Devices**  
Systems and devices amplify sound for persons with hearing disabilities should be available for public meetings and conferences. Different types of devices are more suitable for different types of hearing disabilities. Devices should be chosen to accommodate the greatest number of individuals.
  - *Relay Indiana*: Relay Indiana, a service of InTRAC, is a free service that provides full telecommunications accessibility to people who are deaf, hard of hearing, or speech impaired. This service allows users with special telecommunication devices to communicate with standard users through specially trained Relay Operators. InTRAC also provides free, loaned equipment to those who qualify.
  - *Assistive Listening Systems Technical Bulletins* - are available on the U.S. Access Board's website ([www.access-board.gov/adaag/about/bulletins/als-a.htm](http://www.access-board.gov/adaag/about/bulletins/als-a.htm)).
  - *Closed Caption Machine* - To the extent practical, Town Divisions should have

access to a device for encoding closed captioning on films and videotapes used for training and other programs.

- *Enlarging Printed Materials* - A copy machine capable of enlarging printed materials should be available for each site where programs or transaction counter services are provided to the public.
- *Optical Readers* - Equipment that can translate printed information into an audio format should be available to Departments.
- *TDD* - To the extent necessary, Town Departments 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.
- *Telecommunications for the Deaf, Inc.* - TDI (formerly known as Telecommunications for the Deaf and Hard of Hearing, Inc.) mission is to promote equal access in telecommunications, media, and information technologies for people who are deaf, hard of hearing, late deafened, or deaf blind. TDI's online resources ([www.tdi-online.org/](http://www.tdi-online.org/)) include information about telecommunications access such as a TTY, pagers, telephony, VoIP, and more.

### Guide to Disabilities and Disability Etiquette

A summary guide to disabilities and disability etiquette has been included below. The guide will allow staff members to become familiar with a variety of types of disabilities, and help them to be more sensitive to the abilities and needs of people with disabilities in order not to offend or demean them. The guide should be periodically updated to ensure that it includes current acceptable language for talking about disabilities.

The National Organization on Disability reports that more than 59 million Americans have a disability. This section is for anyone — with or without a disability — who wants to interact more effectively with people who are disabled.



The ADA was conceived with the goal of integrating people with disabilities into all aspects of American life, particularly the workplace and the marketplace. Sensitivity toward people with disabilities is not only in the spirit of the ADA, it makes good business sense. It can help the Town expand its services to citizens, better serve its customers and improve relationships with its employees.

When supervisors and co-workers use disability etiquette, employees with disabilities feel more comfortable and work more productively. Practicing disability etiquette is an easy way to make all people feel more comfortable and welcomed in their environment.

There is no reason to feel awkward when dealing with a person who has a disability. This section provides some basic tips for Town staff to follow. If Town employee is ever unsure how to best serve a person with a disability, just ask them.

- **Ask Before You Help**

Just because someone has a disability, don't assume he/she needs your help. If the setting is accessible, people with disabilities can usually get around fine without assistance. Adults with disabilities want to be treated as independent people. Offer assistance only if the person appears to need it. If they do want help, ask what type of help they would like before you offer any assistance. What you think they may need may not be what they really need.

- **Do Not Touch!**

Some people with disabilities depend on their arms for balance. Grabbing them – even if you mean well – could knock them off balance and create an injury. This is especially true of a person using a cane, crutches, or walker.

When someone is in a wheelchair, never pat their head or touch their wheelchair (or scooter) without permission. This equipment is part of their personal space and touching it is considered rude.

- **Engage Your Mind Before Engaging Your Mouth**

Always speak directly to the person with the disability NOT to their companion, aide, or sign language interpreter. Making small talk with a person who has a disability is great; just talk to him/her like you would anyone else. Respect his/her privacy and don't ask questions about their disability unless they invite the discussion. If you are with a child who asks, don't make the situation awkward for everyone; let the person with the disability respond directly to the child. They are used to children's questions.

- **Make No Assumptions**

People with disabilities are the best judge of what they can or cannot do. Do not make any decisions for them about participating in any activity or what they may or may not be able to do. Simply respond to their questions and let them make their own decisions. Depending on the situation, it may be a violation of the ADA to exclude someone because of a wrong decision on what they're capable of doing.

- **Respond Graciously To Requests**

When people who have a disability ask for an accommodation at a Town owned property, it is not a complaint. It shows they feel comfortable enough in your establishment to ask for what they need. If they get a positive response, they will enjoy their transaction and feel comfortable to come back again and again. Unless they are asking for something outlandish, provide what is asked for. If they request something unreasonable, contact your ADA Coordinator for a direction toward a resolution.

- **Terminology**

**PUT THE PERSON FIRST!** Always say "person with a disability" rather than "disabled person". This recognizes that they are a person first, not a disability first. If someone has a specific disability, it would be a "person who is blind", a "person who is deaf", or a "person with dwarfism". Each person may have their own preferred terminology, and if you're not sure what to use, just ask them. Most, however, will



recognize the effort when you just refer to them as “people”.

Avoid outdated, politically incorrect terms like “handicapped” or “crippled”. Be aware that many people with disabilities dislike jargon and euphemistic terms like “physically challenged” and “differently abled”. Say “wheelchair user” instead of “confined to a wheelchair” or “wheelchair bound”. The wheelchair is what enables the person to get around, but they are neither confined by it nor bound to it. The wheelchair is liberating, not confining.

With any disability, avoid negative, disempowering words like “victim” or “sufferer”. Say “person with AIDS” instead of “AIDS victim” or person who “suffers from AIDS”.

It’s okay to use idiomatic expressions when talking to people with disabilities. For example, saying “It was good to see you” and “See you later” to a person who is blind is completely acceptable. They will use the same terminology and it’s inappropriate to respond with questions like, “How are you going to see me later?”

People in wheelchairs will say things like, “Let’s go for a walk” and it’s okay for you to say it too. The situation will only become awkward if you make it so.

Many people who are Deaf communicate with sign language and consider themselves to be members of a cultural and linguistic minority group. They refer to themselves as Deaf (with a capital D) and may be offended by the term “hearing impaired.” Others may not object to the term, but in general it is safest to refer to people who have hearing loss but communicate through a spoken language as “people with hearing loss” and those who have a profound hearing loss as “people who are Deaf”.

### **Community Groups, Organizations, Associations and Commissions**

There are a large number of groups nationally, regionally, and within each state that provide specialized services, information, and advocacy

for persons with all disabilities. A few are included below:

- *Ability Resources, Inc.:* Ability Resources Inc. ([www.ability-resources.org/home.org](http://www.ability-resources.org/home.org)) was founded in 1976. Their mission is to assist people with disabilities in attaining and maintaining their personal independence. One way this can be achieved is in the creation of an environment in which people with disabilities can exercise their rights to control and direct their own lives.
- *American Council of the Blind:* ACB ([www.acb.org](http://www.acb.org)) 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. ACB is located at 1155 15th St. NW, Suite 1004, Washington, DC 20005 (800.424.8666) or by email at [info@acb.org](mailto:info@acb.org).
- *American Association of People with Disabilities:* The American Association of People with Disabilities ([www.aapd.com/](http://www.aapd.com/)) is the largest non-profit, non-partisan, cross-disability organization in the United States.
- *National Association of the Deaf:* 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 ([www.nad.org](http://www.nad.org)).
- *National Federation of the Blind:* NFB is a national organization advocating on behalf of persons who are blind or have low vision. NFB provided online resources ([www.nfb.org](http://www.nfb.org)) 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).
- *National Organization on Disability:* The National Organization on Disability promotes the full and equal participation and contribution of America’s 54 million men, women and children with disabilities in all aspects of life. NOD maintains an on-line directory of information and links

including transportation-related resources ([www.nod.org](http://www.nod.org)).

- *Paralyzed Veterans of America*: PVA is a national advocacy organization representing veterans. PVA's Sports and Recreation Program promotes a range of activities for people with disabilities, with special emphasis on activities that enhance lifetime health and fitness. PVA's website ([www.pva.org/sports/sportsindex.htm](http://www.pva.org/sports/sportsindex.htm)) provides information on useful sports publications and a list of contacts.
- *United Spinal Association*: United Spinal Association is a membership organization serving individuals with spinal cord injuries or disease. Formerly known as the Eastern Paralyzed Veterans Association, the organization expanded its mission to serve people with spinal cord injuries or disease regardless of their age, gender, or veteran status. Information on accessibility training and consulting services and recreational opportunities for people with spinal cord injuries or disease is available on their website ([www.unitedspinal.org](http://www.unitedspinal.org)).
- *World Institute on Disability*: WID is an international public policy center dedicated to carrying out research on disability issues and overcoming obstacles to independent living. WID maintains an on-line information and resource directory on technology, research, universal design, and the ADA. ([www.wid.org/resources](http://www.wid.org/resources)).
- *State of Indiana Division of Disability & Rehabilitative Services (DDRS)*: [www.in.gov/fssa/ddrs/2637.htm](http://www.in.gov/fssa/ddrs/2637.htm)
- *State of Indiana Protection and Advocacy Services (IPAS)*: [www.in.gov/ipas/](http://www.in.gov/ipas/)
- *Disability Resources, Inc., Guide to Disability Resources on the Internet – IN*: Disability Resources, inc. is a nonprofit 501(c)(3) organization established to promote and improve awareness, availability and accessibility of information that can help people with disabilities live, learn, love, work and play independently. [www.disabilityresources.org/INDIANA.html](http://www.disabilityresources.org/INDIANA.html)
- *Indiana Resource Center for Families with Special Needs (IN\*SOURCE)*: The mission of IN\*SOURCE is to provide parents,

families, and service providers in Indiana the information and training necessary to assure effective educational programs and appropriate services for children and young adults with disabilities. IN\*SOURCE employs nearly 13 staff at their central office in South Bend and 16 staff in other regional sites around the state. [insource.org/index.htm](http://insource.org/index.htm)

- *ADA-Indiana*: The mission of ADA-Indiana is to serve as a statewide resource for promoting the implementation of the Americans with Disabilities Act in Indiana. [www.adaindiana.org/](http://www.adaindiana.org/)
- *Great Lakes ADA Center*: The Great Lakes ADA Center provides information, materials, technical assistance and training on the ADA. Topics addressed includes the non-discrimination requirements in employment, the obligations of state and local governments and business to ensure that programs, services and activities are readily accessible to and useable by people with disabilities. The Great Lakes ADA Center's Accessible Technology Initiative encourages incorporation of accessible information technology in K-12 and post secondary school settings. Accessible Information Technology incorporates the principles of universal design so that people with a wide range of abilities and disabilities can access information disseminated electronically. [www.adagreatlakes.org/](http://www.adagreatlakes.org/)
- *Indiana Council on Independent Living*: Their mission is to effectively lead a statewide Independent Living Movement that empowers people with disabilities. [www.icoil.org/index.html](http://www.icoil.org/index.html)
- *The Arc of Indiana*: The Arc of Indiana is committed to all people with developmental disabilities realizing their goals of learning, living, working and playing in the community. [www.arcind.org/](http://www.arcind.org/)
- *Deaf Link*: Provides video remote interpreting (VRI) to provide the highest standard of inclusion for persons who are Deaf, Blind, Hard-of Hearing and Deaf-Blind. [www.deaflink.com/index.aspx](http://www.deaflink.com/index.aspx)

## **Appendix A**

# **Town of LaGrange Facility Physical Barrier Reports**



# Town Hall

Data collected  
4/2013

Exterior			
Item #	Description	Priority	Estimated Cost
1-1	Parking Lot		
	<i>52 spaces provided including 3 marked accessible. 1 van accessible space and 2 accessible spaces required.</i>		
	<i>Provide Accessible Stalls</i>	High	\$ 360
	Notes: Restripe spaces to provide access aisles (8' width at van space, 5' at car space). Provide van accessible tag. Federal Guideline: 208.2, 208.3		
Interior			
Item #	Description	Priority	Estimated Cost
	Entry Lobby/Public Meeting Space		
8a-1	<i>South Entry Door: Provide means of egress signage</i>	High	\$110
	Notes: Visual only provided. Tactile required. Federal Guideline:		
	<i>Provide Kick Plate</i>	Medium	\$110
	Notes: Glazing begins at 8" from finish floor (bottom 10" required smooth) Federal Guideline: 404.2.10		
	<i>Consider Providing Audio Amplification System and Assistive Listening Devices for Meeting Use</i>	N/A	N/A
34-2	<i>Provide Accessible Service Counter at Utility Office</i>	Low	\$600
	Notes: Counter height is 35 3/4" (28" - 34" with knee space for work surface) Alternate accommodation available in public meeting space. Federal Guideline: 226.1, 902.2		
	New Accounts/Restroom Corridor		
8b-1	<i>Provide Wall Signage at door to Restrooms and New Accounts</i>	Medium	\$100
	Notes: None provided. Braille, and Raised Text signage required. Federal Guideline: 703.6, 216.8		
	<i>Modify Electrical Controls</i>	Low	\$210
	Notes: Located at 51" Ht. (15-48" Req'd) Provide occupancy sensor with timer (generally not public operations). Federal Guideline: 205.1, 308.2, 308.3		
34-1	<i>Provide Accessible Service Counter</i>	Low	\$600
	Notes: Counter height is 43" (36" max for verbal interaction only; 28" - 34" with knee space for work surface) Alternate accommodation available in public meeting space. Federal Guideline: 226.1, 902.2		



Item #	Description	Priority	Estimated Cost
	Unisex Restroom		
16-1	<i>Provide Wall Signage</i>	Medium	\$100
	Notes: None provided. Pictogram, ISA, Braille, and Raised Text signage required. No space on latch side of door. Federal Guideline: 703.6, 216.8		
	<i>Insulate Water Lines</i>	Medium	\$100
	Notes: Supply lines, valves, and exposed drain pipes are not insulated or configured to protect against contact. Federal Guideline: 606.5		
	<i>Modify Electrical Controls</i>	Low	\$210
	Notes: Located at 48 1/2" Ht. (15-48" Req'd) Provide occupancy sensor with timer. Federal Guideline: 205.1, 308.2, 308.3		
	<i>Replace Toilet</i>	Low	\$2,860
	Notes: Toilet is located 19" from side wall to centerline of toilet (16"min-18"max req'd) Toilet seat is 15 1/2" ht (17"-19" req'd). Federal Guideline: 604.2, 604.4		
	<i>Reconfigure Partitions to Provide Adequate Stall Width</i>	High	\$350
	Notes: Stall width is 48 1/2" (60" min.) Federal Guideline: 404.2.3, 604.3.1		
	<i>Reposition Toilet Paper Dispenser</i>	Medium	\$70
	Notes: Dispenser located behind front of toilet on wide side of stall (Centerline 7"-9" in front req'd) Federal Guideline: 604.2		
	<i>Reposition Grab Bars</i>	Low	\$1,000
	Notes: Rear grab bar is positioned 17"/19" to toilet centerline (24"/12" to toilet centerline req'd). Side grab bar extends only 53" from rear wall (54" req'd). Federal Guideline: 604.5		
	<i>Reposition Coat Hook</i>	Low	\$70
	Notes: Located at 64" ht (15"-48" req'd). Federal Guideline: 603.4, 308		
8b-2	<i>Replace Door Hardware</i>	High	\$300
	Notes: Lock requires grasping and twisting. Federal Guideline: 309.4, 404.2.7		
	<b>Facility Total:</b>		\$6,790

**General Notes:** Employee only areas were not included in the evaluation of this facility.

# Fire Department

Data collected  
4/2013

Exterior			
Item #	Description	Priority	Estimated Cost
	Parking Lot		
	<i>Parking and entry walks are shared with Town Hall / Police Department. See Town Hall listing for information.</i>		
Interior			
Item #	Description	Priority	Estimated Cost
	General		
8a-1	<i>Entry Door: Adjust Door Closer</i>	High	\$490
	Notes: Door closes in less than 5 sec min. Federal Guideline: 404.2.8.1		
	<i>Provide means of egress signage</i>	High	\$110
	Notes: Visual only provided. Tactile required. Federal Guideline:		
8b-1	<i>Door to Town Hall: Replace Door Hardware</i>	High	\$300
	Notes: Knobs require grasping and twisting. Federal Guideline: 404.2.7		
	Community Room		
8b-5	<i>Adjust Door Closer</i>	High	\$490
	Notes: Door operating effort is over 12 lbs (5lb max). Federal Guideline: 404.2.9		
	Men's Restroom		
16-1	<i>Provide Wall Signage</i>	Medium	\$100
	Notes: None provided. Pictogram, ISA, Braille, and Raised Text signage required on latch side of door. Federal Guideline: 703.6, 216.8		
8b-3	<i>Provide Door Signage</i>	Low	\$100
	Notes: Visual only provided with insufficient pictogram field height. Provide 6" pictogram field and raised text. Federal Guideline: 703.6, 216.8		
	<i>Reposition Mirror</i>	Low	\$70
	Notes: Bottom of reflecting surface is 40 3/8" AFF (40" max.) Federal Guideline: 603.3		
	<i>Reposition Dispensers</i>	Low	\$140
	Notes: Soap and paper towel dispensers mounted over 50" high (15"-48" req'd) Federal Guideline: 308, 604.7		
	<i>Provide Clear Space at Electrical Outlet</i>	Low	\$0
	Notes: Partially blocked by trash. Relocate trash receptacle. Federal Guideline: 205.1, 308.3		

Item #	Description	Priority	Estimated Cost
	<i>Reposition Toilet to Provide Required Stall Width</i>	High	\$6,500
	Notes: Toilet is located 19" from side wall to centerline of toilet (16"min-18"max req'd) Toilet is located in alcove of 43 1/2" width (60" required). Recommendation is to swap toilet and sink location to take advantage of available space, including new wall mounted toilet, reuse of existing lavatory, and modification to sanitary/plumbing connections. Federal Guideline: 604.2		
	<i>Reposition Grab Bars</i>	High	Included above
	Notes: Rear grab bar is positioned 15 1/2"/19 1/2" to toilet centerline (24"/12" to toilet centerline req'd). Side grab bar extends only 47 1/2" from rear wall (54" req'd). Federal Guideline: 604.5		
	<b>Women's Restroom</b>		
	<i>Provide Wall Signage</i>	Medium	\$100
	Notes: None provided. Pictogram, ISA, Braille, and Raised Text signage required on latch side of door. Federal Guideline: 703.6, 216.8		
8b-4	<i>Provide Door Signage</i>	Low	\$100
	Notes: Visual only provided with insufficient pictogram field height. Provide 6" pictogram field and raised text. Federal Guideline: 703.6, 216.8		
16-1	<i>Reposition Mirror</i>	Low	\$70
	Notes: Bottom of reflecting surface is 40 1/4" AFF (40" max.) Federal Guideline: 603.3		
	<i>Reposition Dispensers</i>	Low	\$140
	Notes: Soap and paper towel dispensers mounted over 50" high (15"-48" req'd) Federal Guideline: 308, 604.7		
	<i>Reposition Toilet Paper Dispenser</i>	Low	\$70
	Notes: Dispenses 4" and 10" in front of toilet (Centerline 7"-9" in front req'd) Federal Guideline: 604.2		
	<i>Reposition Grab Bars</i>	Low	\$1,000
	Notes: Rear grab bar is positioned 12 1/2"/23 1/2" to toilet centerline (24"/12" to toilet centerline req'd). Side grab bar extends only 47 3/4" from rear wall (54" req'd). Federal Guideline: 604.5		
	<b>Facility Total:</b>		\$9,780

**General Notes:** Employee only areas, including the kitchen, were not included in the evaluation of this facility.

# Police Department

Data collected  
4/2013

Exterior			
Item #	Description	Priority	Estimated Cost
	Parking Lot		
	<i>Parking and entry walks are shared with Town Hall / Fire Department. See Town Hall listing for information.</i>		
Interior			
Item #	Description	Priority	Estimated Cost
	Entry Lobby		
	<i>Provide means of egress signage</i>	High	\$110
	Notes: Visual only provided. Tactile required. Federal Guideline:		
18-1	<i>Modify 'For Assistance' Sign and Button</i>	High	\$200
	Notes: Signage does not provide Braille or raised text. Button is not contrasting with background for better visibility. Federal Guideline: N/A		
	Single User Restroom		
16-1	<i>Provide Wall Signage</i>	Medium	\$100
	Notes: None Provided. Pictogram, ISA, Braille, and Raised Text signage required on latch side of door. Federal Guideline: 703.6, 216.8		
	<i>Provide Door Signage</i>	Low	\$100
	Notes: None provided. Provide pictogram and raised text. Federal Guideline: 703.6, 216.8		
	<i>Replace water controls</i>	Medium	\$350
	Notes: Knobs require grasping and twisting. Federal Guideline: 606.4, 309		
	<i>Reposition Paper Towel Dispenser</i>	Low	\$70
	Notes: Dispenser mounted at 52 1/2" high (15"-48" req'd) Federal Guideline: 308, 604.7		
	<i>Reposition Toilet</i>	Low	\$765
	Notes: Toilet is located 19" from side wall to centerline of toilet (16"min-18"max req'd) Federal Guideline: 604.2		
	<i>Reposition Toilet Paper Dispenser</i>	Low	\$70
	Notes: Dispenser mounted 1" in front of toilet (Centerline 7"-9" in front req'd) Federal Guideline: 604.7		

Item #	Description	Priority	Estimated Cost
	<i>Reposition Grab Bars</i>	Low	\$1,000
	Notes: Rear grab bar is positioned 17"/19" to toilet centerline (24"/12" to toilet centerline req'd). Side grab bar extends only 44 1/2" from rear wall (54" req'd). Federal Guideline: 604.5		
	<b>Facility Total:</b>		\$2,765

**General Notes:** Employee only and secured areas were not included in the evaluation of this facility.



# Greenwood Cemetery

Data collected  
5/2013

Exterior			
Item #	Description	Priority	Estimated Cost
1-1	Parking Lot		
	<i>4 spaces provided including 0 marked accessible. 1 van accessible space required.</i>		
	<i>Provide Accessible Stall</i>	High	\$ 360
	Notes: Clearly mark van accessible space and access aisle. Provide accessible parking signage, including van tag. Connect to accessible route. Federal Guideline: 208.2, 208.3		
4-1	Walks		
	<i>Relocate Trash Cans and Eliminate Level Changes</i>	Low	\$300
	Notes: Trash cans narrow accessible route to 32" (36" req'd). 2 level changes at access to parking and lip at SW corner are greater than 1/2" allowed. Federal Guideline: 403.5		
Interior			
Item #	Description	Priority	Estimated Cost
	Cemetery Office		
18-1	<i>Provide Maneuvering Space</i>	Medium	\$0
	Notes: 47x41 space available. 60" dia. Min req'd. Reconfigure furniture as needed. Federal Guideline: 304.3, 306		
	<i>Provide Wall Signage</i>	Medium	\$100
	Notes: Text only provided. Braille, and Raised Text signage required on latch side of door. Federal Guideline: 703, 216.8		
8a-1	<i>Replace Entry Door Hardware</i>	High	\$300
	Notes: Knobs require grasping and twisting. Federal Guideline: 404.2.7		
	<i>Adjust Door Closer</i>	High	\$490
	Notes: Door closes in less than 5 sec min. Federal Guideline: 404.2.8.1		
	Single User Restroom (North) <sup>2</sup>		
16-1	<i>Provide Wall Signage</i>	Medium	\$100
	Notes: None Provided. Pictogram, ISA, Braille, and Raised Text signage required on latch side of door. Federal Guideline: 703.6, 216.8		
	<i>Replace Door Signage</i>	Medium	\$100
	Notes: Pictogram field too small and text not raised. Federal Guideline: 703.6, 216.8		

Item #	Description	Priority	Estimated Cost
	<i>Build out exterior wall to provide adequate maneuvering space and stall width</i>	Medium	\$28,000
	Notes: 60" dia. Min maneuvering space req'd. Clear width at toilet obstructed by sink. Federal Guideline: 304.3, 306		
	<i>Reposition Lavatory</i>	Medium	Included Above
	Notes: Clear knee space is 26 3/4" ht. Raise sink such that top of rim does not exceed 34". Relocate sink to allow for required clear stall width at toilet. Federal Guideline: 606.2, 306.3		
	<i>Replace water controls</i>	Medium	\$350
	Notes: Knobs require grasping and twisting. Federal Guideline: 606.4, 309		
	<i>Insulate water lines</i>	Medium	\$100
	Notes: Supply lines, valves, and exposed drain pipes are only partially insulated to protect against contact. Federal Guideline: 606.5		
	<i>Reposition Paper Towel Dispenser</i>	Low	\$70
	Notes: Dispenser mounted at 55" high (15"-48" req'd) Federal Guideline: 308, 604.7		
	<i>Modify Flush Controls</i>	Low	\$400
	Notes: Flush controls are located on narrow side of toilet. Replace with automatic sensor. Federal Guideline: 604.6		
	<i>Reposition Toilet Paper Dispenser</i>	Low	\$70
	Notes: Dispenser mounted behind front of toilet (Centerline 7"-9" in front req'd) Also, relocate to avoid interference with required clear space when grab bars are installed. Federal Guideline: 604.7		
	<i>Provide Grab Bars</i>	High	\$1,000
	Notes: None Provided Federal Guideline: 604.5		
8b-2	<i>Replace Door including Hardware and Closer</i>	High	\$3,500
	Notes: Clear width is 24 3/4" (32" min). Hardware requires grasping and twisting. Federal Guideline: 404.2.7		
	<b>Single User Restroom (South)<sup>2</sup></b>		
16-2 / 8b-1	<i>Provide signage indicating location of accessible restroom when modifications are complete for South restroom.</i>	High	\$100
	Notes: Overall size of existing stall, threshold, and doorway make restroom inaccessible. Federal Guideline: 404.2.3, 603.2		
	<b>Facility Total:</b>		\$35,340

Item #	Description	Priority	Estimated Cost
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**General Notes:**

1. Employee only areas were not included in the evaluation of this facility.
2. The restrooms were included in the evaluation because they are currently open to the public. However, the Town may consider a study of usage counts prior to making costly renovations to determine whether these are actually used by the public. Depending on the outcome of study, they may transition to employee only. Other options proposed include converting the two rooms into one larger single user restroom if structurally feasible.



# LaGrange Town Park

Data collected  
4/2013

Exterior			
Item #	Description	Priority	Estimated Cost
1-1	Parking Lot (Main Parking lot at northeast)		
	<i>Gravel lot - No accessible spaces provided. Approximately 28 spaces provided. 1 van accessible space and 1 car accessible space required.</i>		
	<i>Provide Accessible Stalls</i>	High	\$ 3,000
	Notes: Pave accessible stalls and access aisles. Clearly mark aisles. Provide accessible parking signage, including van tag at appropriate space. Connect to accessible route. Federal Guideline: 208.2, 208.3		
1-2	Parking Lot (East of Basketball)		
	<i>Gravel lot - No accessible spaces provided. Approximately 5 spaces provided. 1 van accessible space required.</i>		
	<i>Provide Accessible Stalls</i>	High	\$ 1,500
	Notes: Pave accessible stall and access aisle. Clearly mark aisle. Provide accessible parking signage, including van tag. Connect to accessible route. Federal Guideline: 208.2, 208.3		
1-3	Parking Lot (South of Baseball Field)		
	<i>Gravel lot - No accessible spaces provided. Approximately 18 spaces provided. 1 van accessible space required.</i>		
	<i>Provide Accessible Stalls</i>	High	\$ 1,500
	Notes: Pave accessible stall and access aisle. Clearly mark aisle. Provide accessible parking signage, including van tag. Connect to accessible route. Federal Guideline: 208.2, 208.3		
1-4	Parking Lot (at Southwest Picnic Shelter)		
	<i>Gravel lot - No accessible spaces provided. Approximately 10 spaces provided. 1 van accessible space required.</i>		
	<i>Provide Accessible Stalls</i>	High	\$ 1,500
	Notes: Pave accessible stall and access aisle. Clearly mark aisle. Provide accessible parking signage, including van tag. Connect to accessible route. Federal Guideline: 208.2, 208.3		
6-1	Stair (Main Parking to Baseball Field level)		
	<i>Replace Stair Unit or Provide Alternate PAR</i>	Low	\$12,000
	Notes: 14 riser timber stair unit has variable height risers and variable tread depth. Landings and railings are not compliant. Federal Guideline: 210, 304.2, 405.8, 505		



Item #	Description	Priority	Estimated Cost
22-1	Site Furnishings		
	<i>Provide Accessible Route to Picnic Tables</i>	Medium	\$1,200
	Notes: At least 20% are required to be accessible, including accessible route. Tables provided meet dimensional requirements. Place on accessible route with 36" min clear space all sides including 36x48" forward approach at ends. Federal Guideline: 206.2.2, 403, 1016.4, 1011.2		
	<i>Provide Accessible Bench at Play Area</i>	Low	\$1,200
	Notes: At least 20% are required to be accessible, including accessible route. Provide bench meeting dimensional requirements on accessible route including 30x48" level area adjacent. Federal Guideline: 903.2, 403, 1011.2		
	Baseball Field		
21-1	<i>Provide Accessible Seating at Bleachers</i>	Low	\$300
	Notes: None provided. 4 spaces required. Federal Guideline: 206.2.2, 403		
24-1	<i>Provide Accessible Route Including Clear Width at Gates</i>	Medium	\$5,000
	Notes: None provided. Connect to adjacent parking. Federal Guideline: 206.2.2, 403		
	<i>Provide Accessible Player Seating</i>	Low	\$250
	Notes: None provided. Federal Guideline: 221.2, 802.1		
	Basketball Court		
24-2	<i>Provide Accessible Route</i>	Medium	\$150
	Notes: None provided. Connect to adjacent parking. Federal Guideline: 206.2.2, 403		
	Skate Park		
24-3	<i>Provide Accessible Route</i>	Medium	\$600
	Notes: None provided. Connect to adjacent parking. Federal Guideline: 206.2.2, 403		
25-1	Playground		
	<i>Provide Accessible Route to Play Areas</i>	Medium	\$800
	Notes: None provided. Connect to nearest parking. Federal Guideline: 1008.2		
	<i>Provide Accessible Route within Play Areas</i>	Low	\$8,500
	Notes: None Provided. Accessible route should include at least one of each type for ground level play equipment and transfer elements (60" min. width), and at least 50% of elevated components (36" min. width). Provide firm, stable, slip resistant surface meeting CPSC requirements for fall protection. Mainly ground rubber mulch provided. Cost shown includes estimated route only, not surfacing of entire play area. Federal Guideline: 206.2.2, 403.3		

Item #	Description	Priority	Estimated Cost
	Park Shelter (North)		
36-1	<i>Provide Accessible Route</i>	Medium	\$650
	Notes: None Provided. Connect to nearest parking lot. Federal Guideline: 1008.2		
	<i>Remove or Reposition Protruding Objects</i>	Low	\$300
	Notes: Angled supports protrude from 4" to 30" between 52" and 80" height. (4" max. between 27" and 80") Place cane detectable edge below 27". Federal Guideline: 307.2		
	<i>Modify Electrical Controls and Outlets</i>	Low	\$500
	Notes: Electrical controls and outlets are located at 69" from floor and outlets (48" max). Relocate controls and provide outlet within 15"-48" reach range. Federal Guideline: 205.1, 308.2, 308.3		
	Park Shelter (Southwest)		
36-1	<i>Provide Accessible Route</i>	Medium	\$250
	Notes: None Provided. Connect to nearest parking lot. Federal Guideline: 1008.2		
	<i>Remove or Reposition Protruding Objects</i>	Low	\$300
	Notes: Angled supports protrude from 4" to 30" between 52" and 80" height. (4" max. between 27" and 80") Place cane detectable edge below 27". Federal Guideline: 307.2		
<b>Interior</b>			
Item #	Description	Priority	Estimated Cost
	Single User Restroom (East face)		
16-1	<i>Provide Wall Signage</i>	Medium	\$100
	Notes: None Provided. Pictogram, ISA, Braille, and Raised Text signage required on latch side of door. Federal Guideline: 703.6, 216.8		
	<i>Provide Door Signage</i>	Medium	\$100
	Notes: None Provided. Provide sign with pictogram and raised text. Federal Guideline: 703.6, 216.8		
	<i>Adjust Self Closing Mechanism on Faucet</i>	Low	\$350
	Notes: Self close valve does not remain open for required 10 seconds. Federal Guideline: 606.4, 309		
	<i>Insulate Water Lines</i>	Medium	\$100
	Notes: Supply lines, valves, and exposed drain pipes are not insulated or configured to protect against contact. Federal Guideline: 606.5		
	<i>Reposition Toilet and Relocate Partition</i>	Medium	\$1,500
	Notes: Centerline of toilet located 24 1/4" from side wall (16-18" req'd). Stall width is less than 60" req'd. Federal Guideline: 604.2		

Item #	Description	Priority	Estimated Cost
	<i>Reposition Toilet Paper Dispenser</i>	Low	\$70
	Notes: Dispenser mounted at 50+" high (15"-48" req'd) Also, relocate to avoid interference with required clear space at grab bars. Federal Guideline: 604.7		
	<i>Replace Grab Bars</i>	Medium	\$1,000
	Notes: Bars mounted at 41 3/4" ht (33"-36" req'd). Rear bar not aligned properly. Diameter is less than req'd 1 1/4" - 2". Federal Guideline: 604.5		
8a-1	<i>Replace Door Hardware</i>	High	\$300
	Notes: Lock require grasping and twisting. Federal Guideline: 404.2.7		
	Single User Restroom (South face)		
16-2	<i>Provide signage indicating location of accessible restroom when modifications are complete for East restroom.</i>	High	\$100
	Notes: Overall size of existing stall and doorway make restroom inaccessible. Federal Guideline: 404.2.3, 603.2		
	<b>Facility Total:</b>		\$43,120

**General Notes:** Maintenance and equipment buildings were not included in the evaluation of this facility.

# Public Parking Lot: Michigan and Poplar

Data collected  
4/2013

Exterior			
Item #	Description	Priority	Estimated Cost
1-1	Parking Lot (Main Parking lot at northeast)		
	<i>Approximately 47 total spaces provided including 2 marked accessible. 1 van accessible space and 1 car accessible space required.</i>		
	<i>Relocate Accessible Stalls to Nearest Sidewalk, provide access aisles, and provide Van Accessible Tag at appropriate space.</i>	Medium	\$ 500
	Notes: Inadequate access aisles provided. Signage provided is too low and is missing van tag at appropriate space. Federal Guideline: 208.2, 208.3		
	<b>Facility Total:</b>		\$500





## **Appendix B**

### **Town of LaGrange Right-of-Way Reports**



## LAGRANGE ON-STREET PARKING

Description		Estimated Cost
	<b><i>Block bounded by Mountain, Wayne, Detroit, and Central Streets</i></b>	\$ 300
	4 parallel spaces marked on Wayne Street only with no spaces designated accessible. Provide 1 van accessible space, including signage and connection to accessible route via nearest curb ramp.	
	<b><i>Block bounded by High, Lafayette, Detroit, and Wayne Streets</i></b>	\$ 300
	20 parallel spaces marked with no spaces designated accessible. Provide 1 van accessible space, including signage and connection to accessible route via nearest curb ramp.	
	<b><i>Block Bounded by Mountain, Lafayette, High, and Wayne Streets</i></b>	\$ 485
	9 angled and 1 parallel spaces marked on High Street only with no accessible spaces. Provide 1 van accessible space, including signage and connection to accessible route via nearest curb ramp.	
	<b><i>Block Bounded by Mountain, Spring, Lafayette, and High Streets</i></b>	\$ 300
	4 parallel spaces marked on Perry Street only with no spaces designated accessible. Provide 1 van accessible space, including signage and connection to accessible route via nearest curb ramp.	
	<b><i>Block Bounded by High, Spring, Lafayette, and Detroit Streets</i></b>	\$ 785
	25 angled and 14 parallel spaces marked with 1 space designated accessible, but not compliant. Provide 1 van accessible space and 1 car accessible space, including signage and connection to accessible route via nearest curb ramp.	
	<b><i>Block Bounded by Mountain, Michigan, High and Spring Streets</i></b>	\$ 300
	8 parallel spaces marked on High Street only with no spaces designated accessible. Provide 1 van accessible space, including signage and connection to accessible route via nearest curb ramp.	
	<b><i>Block Bounded by High, Michigan, Detroit and Spring Streets</i></b>	\$ 970
	50 angled spaces marked with 1 spaces designated accessible, but not compliant. Provide 1 van accessible space and 1 car accessible space, including signage and connection to accessible route via nearest curb ramp.	
	<b><i>Block bounded by Mountain, Factory, High, and Michigan Streets</i></b>	\$ 300
	5 parallel spaces marked on High Street only with 1 space designated accessible, but not compliant. Modify existing space to be van accessible, including signage and connection to accessible route via nearest curb ramp.	
	<b><i>Block bounded by High, Factory, Detroit, and Michigan Streets</i></b>	\$ 300
	17 parallel spaces marked with no spaces designated accessible. Provide 1 van accessible space, including signage and connection to accessible route via nearest curb ramp.	

Description		Estimated Cost
	<b><i>Block bounded by Detroit, Factory, Poplar and Michigan Streets</i></b>	\$ 300
	18 parallel spaces marked with no spaces designated accessible. Provide 1 van accessible space, including signage and connection to accessible route via nearest curb ramp.	
	<b><i>Block bounded by Detroit, Michigan, Poplar and Spring Streets</i></b>	\$ 485
	8 angled and 16 parallel spaces marked with no spaces designated accessible. Provide 1 van accessible space, including signage and connection to accessible route via nearest curb ramp.	
	<b><i>Block bounded by Detroit, Spring, Poplar, and Lafayette Streets</i></b>	\$ 485
	7 angled and 10 parallel spaces marked with 1 space designated accessible, but not compliant. Modify existing space to be van accessible, including signage and connection to accessible route via nearest curb ramp.	
	<b><i>Block bounded by Detroit, Lafayette, Poplar, and Wayne Streets</i></b>	\$ 485
	10 angled and 9 parallel spaces marked with 1 space designated accessible, but not compliant. Modify existing space to be van accessible, including signage and connection to accessible route via nearest curb ramp.	
	<b><i>Block bounded by Detroit, Wayne, Poplar and Central Streets</i></b>	\$ 485
	10 angled and 9 parallel spaces marked with 1 space designated accessible, but not compliant. Modify existing space to be van accessible, including signage and connection to accessible route via nearest curb ramp.	
	<b>On-Street Parking Total</b>	\$ 5,980

**General Notes:** On-Street parking exists on most Town streets, however, ADA requirements per the 2011 PROWAG require accessible parking only at those spaces that are marked and/or metered. Unmarked parking was not included in the evaluation of this program. Marked parking spaces were located in the Downtown area only, which is considered a high priority area for access to services. It is recommended that accessible spaces be located adjacent to an accessible curb ramp nearest high traffic businesses and services in the Downtown area. In perimeter areas of the downtown, ROW may be wide enough (14') to require access aisle at parallel parking spaces and should be confirmed prior to modification. Modifications to provide accessible parking where none currently exists may include, but not limited to, regrading and/or resurfacing of parking space to achieve required slopes, providing pavement markings and signage, and providing a connection to an accessible route.





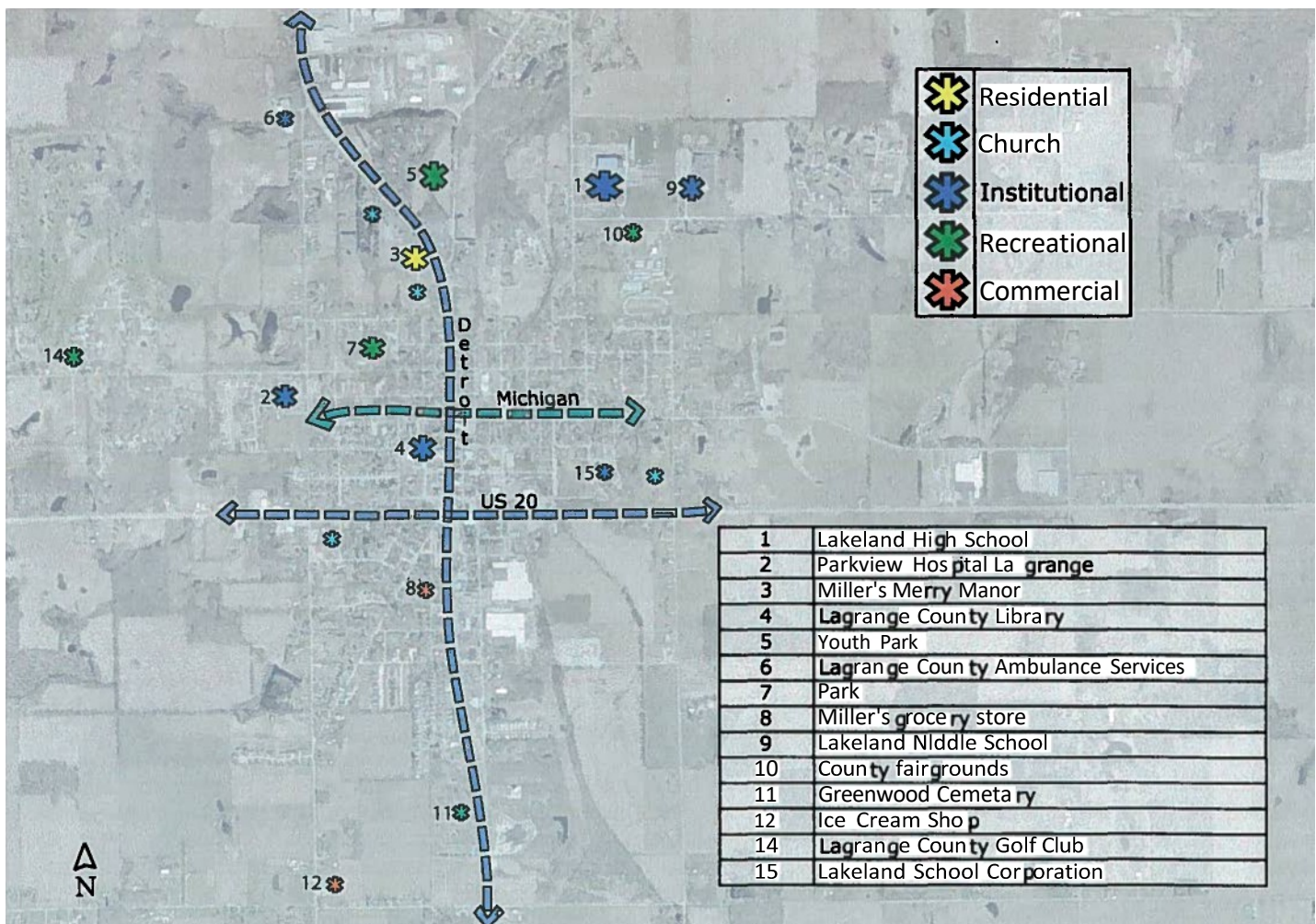
# Lagrange Trails

Included for reference only from previous Town study. Locations indicated may be used in determining contributing contextual factors for yearly work plan on Right-Of-Way improvements.

## Destinations

The following destinations were determined by community members as places of importance within the community. These are places that citizens should be able to walk to. Figure 1.1 shows the main arteries of Lagrange as well as the main destinations.

Figure 1.1



## LAGRANGE CURB RAMPS

Description	Priority	Cost	Cost Category
NORTHWEST CORNER OF MEADOWBROOK AND LAKELAND	High Priority	\$ 1,500	2
MIDBLOCK, WEST SIDE OF MEADOWBROOK (END OF PARTIAL BLOCK)	High Priority	\$ 1,500	2
NORTHEAST CORNER OF MAPLE AND PLEASANT	High Priority	\$ 2,700	3
SOUTHEAST CORNER OF MAPLE AND PLEASANT	High Priority	\$ 2,700	3
NORTH SIDE OF PLEASANT, HILLSIDE TO MAPLE (END OF PARTIAL BLOCK)	Low Priority	\$ 2,700	3
SOUTH SIDE OF PLEASANT, HILLSIDE TO MAPLE (END OF PARTIAL BLOCK)	Low Priority	\$ 2,700	3
SOUTHEAST CORNER OF PARKWAY & PLEASANT	High Priority	\$ 2,700	3
SOUTHWEST CORNER OF PARKWAY & PLEASANT	High Priority	\$ 2,700	3
SOUTH SIDE OF INTERSECTION OF FAIRVIEW AND PARKWAY	High Priority	\$ 2,700	3
NORTHEAST CORNER OF MICHIGAN AND MAPLE	High Priority	\$ 1,500	2
NORTHWEST CORNER OF MICHIGAN AND MAPLE	High Priority	\$ 1,500	2
NORTHEAST CORNER OF MICHIGAN AND CANAL SOUTH RAMP	High Priority	\$ 1,500	2
NORTHEAST CORNER OF MICHIGAN AND CANAL WEST RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF MICHIGAN AND CANAL EAST RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF MICHIGAN AND CANAL SOUTH RAMP	High Priority	\$ 1,500	2
NORTHEAST CORNER OF MICHIGAN AND SYCAMORE	High Priority	\$ 2,700	3
NORTHEAST CORNER OF MICHIGAN AND SYCAMORE SOUTH RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF MICHIGAN AND SYCAMORE EAST RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF MICHIGAN AND SYCAMORE SOUTH RAMP	High Priority	\$ 2,700	3
NORTHEAST CORNER OF MICHIGAN AND WALNUT	High Priority	\$ 1,500	2
NORTHWEST CORNER OF MICHIGAN AND WALNUT	High Priority	\$ 1,500	2
NORTHEAST CORNER OF MICHIGAN AND NORTH POPLAR SOUTH RAMP	High Priority	\$ 1,500	2
NORTHEAST CORNER OF MICHIGAN AND NORTH POPLAR WEST RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF MICHIGAN AND NORTH POPLAR EAST RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF MICHIGAN AND NORTH POPLAR SOUTH RAMP	High Priority	\$ 1,500	2
SOUTHWEST CORNER OF MICHIGAN AND SOUTH POPLAR	High Priority	\$ 2,700	3
SOUTHWEST CORNER OF MICHIGAN AND SOUTH POPLAR EAST RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF MICHIGAN AND POPLAR WEST RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF MICHIGAN AND POPLAR NORTH RAMP	High Priority	\$ 1,500	2
SOUTHWEST CORNER OF MICHIGAN AND SYCMORE	High Priority	\$ 2,700	3
SOUTHWEST CORNER OF MICHIGAN AND SYCAMORE EAST RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF MICHIGAN AND SYCAMORE WEST RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF MICHIGAN AND SYCAMORE NORTH RAMP	High Priority	\$ 1,500	2
SOUTHWEST CORNER OF MICHIGAN AND CANAL NORTH RAMP	High Priority	\$ 1,500	2
SOUTHWEST CORNER OF MICHIGAN AND CANAL EAST RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF MICHIGAN AND CANAL	High Priority	\$ 2,700	3
SOUTHEAST CORNER OF CANAL AND EAST NORTH STREET	High Priority	\$ 2,700	3
NORTHEAST CORNER OF CANAL AND EAST NORTH STREET	High Priority	\$ 2,700	3
SOUTHEAST CORNER OF NURSERY AND CANAL NORTH RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF NURSERY AND CANAL WEST RAMP	High Priority	\$ 1,500	2
NORTHEAST CORNER OF CANAL AND MAPLE	High Priority	\$ 2,700	3
SOUTHEAST CORNER OF CANAL AND MAPLE	High Priority	\$ 2,700	3
NORTHWEST CORNER OF MAPLE AND EAST NORTH	High Priority	\$ 4,000	4
NORTHEAST CORNER OF MAPLE AND EAST NORTH	High Priority	\$ 1,500	2
NORTHEAST CORNER OF STEUBEN AND CANAL SOUTH RAMP	High Priority	\$ 1,500	2
NORTHEAST CORNER OF STEUBEN AND CANAL WEST RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF STEUBEN AND CANAL WEST RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF STEUBEN AND CANAL SOUTH RAMP	High Priority	\$ 1,500	2
SOUTHWEST CORNER OF STEUBEN AND CANAL NORTH RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF STEUBEN AND CANAL NORTH RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF EAST LAKE AND CANAL SOUTH RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF EAST LAKE AND CANAL EAST RAMP	High Priority	\$ 1,500	2
SOUTHWEST CORNER OF EAST LAKE AND CANAL NORTH RAMP	High Priority	\$ 1,500	2

<b>Description</b>	<b>Priority</b>	<b>Cost</b>	<b>Cost Category</b>
SOUTHWEST CORNER OF EAST LAKE AND CANAL EAST RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF EAST LAKE AND CANAL	High Priority	\$ 1,500	2
NORTHEAST CORNER OF STEUBEN AND SYCAMORE WEST RAMP	High Priority	\$ 1,500	2
NORTHEAST CORNER OF STEUBEN AND SYCAMORE SOUTH RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF STEUBEN AND SYCAMORE NORTH RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF STEUBEN AND SYCAMORE EAST RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF STEUBEN AND SYCAMORE SOUTH RAMP	High Priority	\$ 1,500	2
SOUTHWEST CORNER OF STEUBEN AND SYCAMORE NORTH RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF STEUBEN AND WALNUT EAST RAMP	High Priority	\$ 1,500	2
NORTHEAST CORNER OF STEUBEN AND WALNUT	High Priority	\$ 2,700	3
NORTHEAST CORNER OF STEUBEN AND POPLAR WEST RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF STEUBEN AND POPLAR EAST RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF STEUBEN AND POPLAR SOUTH RAMP	High Priority	\$ 1,500	2
SOUTHWEST CORNER OF STEUBEN AND POPLAR NORTH RAMP	High Priority	\$ 1,500	2
SOUTHWEST CORNER OF STEUBEN AND POPLAR EAST RAMP	Low Priority	\$ 1,500	2
NORTHEAST CORNER OF FACTORY AND SYAMORE SOUTH RAMP	High Priority	\$ 1,500	2
NORTHEAST CORNER OF FACTORY AND SYCAMORE WEST RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF FACTORY AND SYCAMORE NORTH RAMP	High Priority	\$ 1,500	2
SOUTHWEST CORNER OF FACTORY AND SYCAMORE NORTH RAMP	High Priority	\$ 1,500	2
NORTHEAST CORNER OF FACTORY AND SYCAMORE SOUTH RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF SYCAMORE AND FACTORY EAST RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF SYCAMORE AND FACTORY SOUTH RAMP	Medium Priority	\$ 1,000	1
SOUTHWEST CORNER OF SYCAMORE AND FACTORY NORTH RAMP	Low Priority	\$ 1,000	1
NORTHEAST CORNER OF CANAL AND SPRING NORTH RAMP	High Priority	\$ 1,500	2
NORTHEAST CORNER OF CANAL AND SPRING SOUTH RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF CANAL AND SPRING WEST RAMP	High Priority	\$ 1,500	2
SOUTHWEST CORNER OF CANAL AND SPRING EAST RAMP	High Priority	\$ 1,500	2
SOUTHWEST CORNER OF CANAL AND SPRING NORTH RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF CANAL AND SPRING SOUTH RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF CANAL AND SPRING EAST RAMP	High Priority	\$ 1,500	2
NORTHEAST CORNER OF SPRING AND SYCAMORE WEST RAMP	Low Priority	\$ 1,500	2
NORTHEAST CORNER OF SPRING AND SYCAMORE SOUTH RAMP	High Priority	\$ 1,500	2
SOUTH SIDE OF SPRING AND SYCAMORE NORTH RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF SPRING AND SYCAMORE EAST RAMP	Medium Priority	\$ 1,500	2
NORTHWEST CORNER OF SPRING AND WALNUT EAST RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF SPRING AND POPLAR WEST RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF SPRING AND POPLAR SOUTH RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF SPRING AND POPLAR EAST RAMP	Medium Priority	\$ 1,500	2
NORTHWEST CORNER OF SPRING AND POPLAR SOUTH RAMP	High Priority	\$ 1,500	2
SOUTHWEST CORNER OF SPRING AND POPLAR NORTH RAMP	High Priority	\$ 1,500	2
SOUTHWEST CORNER OF SPRING AND POPLAR EAST RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF SPRING AND POPLAR WEST RAMP	Medium Priority	\$ 1,500	2
SOUTHEAST CORNER OF SPRING AND POPLAR NORTH RAMP	Medium Priority	\$ 1,500	2
SOUTHWEST CORNER OF SPRING AND WALNUT EAST RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF SPRING AND WALNUT WEST RAMP	High Priority	\$ 1,500	2
NORTHEAST CORNER OF WALNUT AND LAFAYETTE EAST RAMP	High Priority	\$ 1,500	2
NORTHEAST CORNER OF WALNUT AND LAFAYETTE SOUTH RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF LAFAYETTE AND WALNUT NORTH RAMP	High Priority	\$ 2,700	3
NORTHEAST CORNER OF LAFAYETTE AND POPLAR WEST RAMP	Medium Priority	\$ 1,000	1
NORTHEAST CORNER OF LAFAYETTE AND POPLAR SOUTH RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF LAFAYETTE AND POPLAR NORTH RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF LAFAYETTE AND POPLAR WEST RAMP	High Priority	\$ 1,500	2
SOUTHWEST CORNER OF LAFAYETTE AND POPLAR EAST RAMP	High Priority	\$ 1,500	2
SOUTHWEST CORNER OF LAFAYETTE AND POPLAR WEST RAMP	High Priority	\$ 1,500	2

<b>Description</b>	<b>Priority</b>	<b>Cost</b>	<b>Cost Category</b>
NORTHWEST CORNER OF POPLAR AND LAFAYETTE SOUTH RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF POPLAR AND LAFAYETTE EAST RAMP	Medium Priority	\$ 1,000	1
NORTHEAST CORNER OF WAYNE AND POPLAR WEST RAMP	Medium Priority	\$ 1,500	2
NORTHEAST CORNER OF WAYNE AND POPLAR SOUTH RAMP	Medium Priority	\$ 1,500	2
SOUTHEAST CORNER OF WAYNE AND POPLAR NORTH RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF WAYNE AND POPLAR WEST RAMP	High Priority	\$ 1,500	2
SOUTHWEST CORNER OF WAYNE AND POPLAR EAST RAMP	High Priority	\$ 1,500	2
SOUTHWEST CORNER OF WAYNE AND POPLAR NORTH RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF WAYNE AND POPLAR SOUTH RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF WAYNE AND POPLAR EAST RAMP	High Priority	\$ 1,500	2
NORTHEAST CORNER OF FENN AND POPLAR	High Priority	\$ 2,700	3
SOUTH WEST CORNER OF FENN AND POPLAR	High Priority	\$ 2,700	3
NORTHEAST CORNER OF FENN AND POPLAR	High Priority	\$ 2,700	3
SOUTHWEST CORNER OF POPLAR AND CLAY	High Priority	\$ 1,500	2
NORTHWEST CORNER OF POPLAR AND CLAY	High Priority	\$ 1,500	2
SOUTHWEST CORNER OF SEYMOUR AND POPLAR EAST RAMP	High Priority	\$ 1,500	2
SOUTHWEST CORNER OF SEYMOUR AND POPLAR NORTH RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF SEYMOUR AND POPLAR SOUTH RAMP	High Priority	\$ 1,500	2
NORTHEAST CORNER OF SEYMOUR AND POPLAR SOUTH RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF SEYMOUR AND POPLAR NORTH RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF SEYMOUR AND POPLAR WEST RAMP	High Priority	\$ 1,500	2
NORTHEAST CORNER OF RYASON AND POPLAR SOUTH RAMP	Low Priority	\$ 1,000	1
SOUTHEAST CORNER OF RYASON AND POPLAR NORTH RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF HAWPATCH AND SOUTH STREET	Medium Priority	\$ 2,700	3
NORTHEAST CORNER OF HAWPATCH AND SOUTH STREET	Low Priority	\$ 1,000	1
NORTHEAST CORNER OF SOUTH AND UNION	High Priority	\$ 2,700	3
SOUTHEAST CORNER OF UNION AND W. CLAY	High Priority	\$ 1,500	2
NORTHEAST CORNER OF UNION AND W. CLAY	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF UNION AND SEYMOUR NORTH RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF UNION AND SEYMOUR WEST RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF UNION AND HAWPATCH EAST RAMP	Low Priority	\$ 1,000	1
SOUTHEAST CORNER OF UNION AND HAWPATCH	Low Priority	\$ 1,000	1
NORTHEAST CORNER OF HAWPATCH AND SEYMOUR NORTH RAMP	Medium Priority	\$ 1,500	2
OF HAWPATCH AND SEYMOUR SOUTHEAST RAMP	Medium Priority	\$ 1,000	1
NORTHEAST CORNER OF W. FENN AND HAWPATCH	Low Priority	\$ 1,500	2
SOUTHEAST CORNER OF W. FENN AND HAWPATCH	High Priority	\$ 4,000	4
NORTHWEST CORNER OF HAWPATCH AND W. BELL	Medium Priority	\$ 2,700	3
SOUTHEAST CORNER OF HAWPATCH AND W. BELL	Medium Priority	\$ 2,700	3
NORTHWEST CORNER OF UNION AND W. SOUTH	High Priority	\$ 2,700	3
SOUTHWEST CORNER OF W. BELL AND UNION	High Priority	\$ 1,500	2
NORTHWEST CORNER OF W. BELL AND UNION	High Priority	\$ 1,500	2
SOUTHWEST CORNER OF W. FENN AND UNION	High Priority	\$ 1,500	2
NORTHWEST CORNER OF W. FENN AND UNION	High Priority	\$ 1,500	2
SOUTHWEST CORNER OF UNION AND SEYMOUR NORTH RAMP	High Priority	\$ 1,500	2
SOUTHWEST CORNER OF UNION AND SEYMOUR EAST RAMP	High Priority	\$ 2,700	3
NORTHWEST CORNER OF UNION AND SEYMOUR SOUTH RAMP	Low Priority	\$ 1,000	1
NORTHWEST CORNER OF GUM AND HAWPATCH	Medium Priority	\$ 2,700	3
SOUTHWEST CORNER OF GUM AND HAWPATCH	Low Priority	\$ 1,500	2
NORTHWEST CORNER OF CHURCH AND HAWPATCH	Low Priority	\$ 1,500	2
SOUTHWEST CORNER OF CHURCH AND HAWPATCH	Low Priority	\$ 1,000	1
NORTHWEST CORNER OF ORCHARD HILL AND HAWPATCH	Low Priority	\$ 1,500	2
SOUTHWEST CORNER OF ORCHARD HILL AND HAWPATCH	Medium Priority	\$ 1,500	2
NORTHEAST CORNER OF W. GUM AND VINE	Low Priority	\$ 1,000	1
WEST SIDE OF W. GUM AND VINE	Low Priority	\$ 1,000	1

<b>Description</b>	<b>Priority</b>	<b>Cost</b>	<b>Cost Category</b>
SOUTHWEST CORNER OF GRANT AND SHERMAN	Low Priority	\$ 1,000	1
SOUTHEAST CORNER OF GRANT AND SHERMAN	Low Priority	\$ 1,000	1
NORTHEAST CORNER OF GRANT AND SHERMAN	Medium Priority	\$ 1,500	2
NORTHWEST CORNER OF GRANT AND SHERMAN	Low Priority	\$ 1,000	1
SOUTHWEST CORNER OF GRANT AND MOUNTAIN	Medium Priority	\$ 1,500	2
NORTHWEST CORNER OF GRANT AND MOUNTAIN SOUTH RAMP	Medium Priority	\$ 1,500	2
NORTHWEST CORNER OF GRANT AND MOUNTAIN EAST RAMP	Medium Priority	\$ 1,500	2
SOUTHEAST CORNER OF LAFAYETTE AND MOUNTAIN EAST RAMP	High Priority	\$ 1,500	2
NORTHEAST CORNER OF LAFAYETTE AND MOUNTAIN SOUTH RAMP	High Priority	\$ 1,500	2
NORTHEAST CORNER OF LAFAYETTE AND MOUNTAIN WEST RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF LAFAYETTE AND MOUNTAIN	High Priority	\$ 1,500	2
SOUTHWEST CORNER OF HIGH AND LAFAYETTE EAST RAMP	High Priority	\$ 1,500	2
SOUTHWEST CORNER OF HIGH AND LAFAYETTE NORTH RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF HIGH AND LAFAYETTE WEST RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF HIGH AND LAFAYETTE NORTH RAMP	High Priority	\$ 1,500	2
NORTHEAST CORNER OF HIGH AND LAFAYETTE SOUTH RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF HIGH AND LAFAYETTE EAST RAMP	Low Priority	\$ 1,000	1
NORTHWEST CORNER OF HIGH AND LAFAYETTE SOUTH RAMP	Low Priority	\$ 1,000	1
SOUTHWEST CORNER OF S. SPRING AND W. SHERMAN EAST RAMP	Low Priority	\$ 1,500	2
NORTHWEST CORNER OF S. SPRING AND W. SHERMAN NORTH RAMP	Low Priority	\$ 1,500	2
NORTHWEST CORNER OF S. SPRING AND W. SHERMAN SOUTH RAMP	Low Priority	\$ 1,500	2
NORTHWEST CORNER OF S. SPRING AND W. SHERMAN EAST RAMP	Low Priority	\$ 1,500	2
NORTHEAST CORNER OF S. SPRING AND W. SHERMAN WEST RAMP	Low Priority	\$ 1,500	2
NORTHEAST CORNER OF S. SPRING AND W. SHERMAN SOUTH RAMP	Low Priority	\$ 1,000	1
SOUTHEAST CORNER OF S. SPRING AND W. SHERMAN NORTH RAMP	Low Priority	\$ 1,500	2
SOUTHEAST CORNER OF S. SPRING AND W. SHERMAN WEST RAMP	Low Priority	\$ 2,700	3
SOUTHWEST CORNER OF S. SPRING AND MOUNTAIN EAST RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF S. SPRING AND MOUNTAIN WEST RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF S. SPRING AND MOUNTAIN NORTH RAMP	High Priority	\$ 1,500	2
NORTHEAST CORNER OF S. SPRING AND W. MOUNTAIN SOUTH RAMP	High Priority	\$ 1,500	2
NORTHEAST CORNER OF S. SPRING AND W. MOUNTAIN WEST RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF S. SPRING AND W. MOUNTAIN EAST RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF S. SPRING AND W. MOUNTAIN SOUTH RAMP	Medium Priority	\$ 2,700	3
SOUTHWEST CORNER OF S. SPRING AND W. MOUNTAIN NORTH RAMP	Medium Priority	\$ 1,500	2
SOUTHWEST CORNER OF W. SPRING AND HIGH EAST RAMP	Medium Priority	\$ 1,500	2
SOUTHWEST CORNER OF W. SPRING AND HIGH NORTH RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF W.SPRING AND HIGH WEST RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF W.SPRING AND HIGH NORTH RAMP	High Priority	\$ 1,500	2
NORTHEAST CORNER OF W.SPRING AND HIGH SOUTH RAMP	High Priority	\$ 1,500	2
NORTHEAST CORNER OF W.SPRING AND HIGH WEST RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF W.SPRING AND HIGH EAST RAMP	Medium Priority	\$ 1,500	2
NORTHWEST CORNER OF W.SPRING AND HIGH SOUTH RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF TOWN LINE AND MICHIGAN	High Priority	\$ 2,700	3
NORTHEAST CORNER OF TOWN LINE AND MICHIGAN	Low Priority	\$ 1,000	1
SOUTHWEST CORNER OF MICHIGAN AND SHERMAN	Medium Priority	\$ 2,700	3
SOUTHEAST CORNER OF MICHIGAN AND SHERMAN WEST RAMP	Medium Priority	\$ 1,500	2
SOUTHEAST CORNER OF MICHIGAN AND SHERMAN NORTH RAMP	High Priority	\$ 1,500	2
NORTHEAST CORNER OF MICHIGAN AND SHERMAN SOUTH RAMP	High Priority	\$ 1,500	2
NORTHEAST CORNER OF MICHIGAN AND SHERMAN WEST RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF MICHIGAN AND SHERMAN EAST RAMP	High Priority	\$ 1,500	2
SOUTHWEST CORNER OF MICHIGAN AND MOUNTAIN EAST RAMP	High Priority	\$ 1,500	2
SOUTHWEST CORNER OF MICHIGAN AND MOUNTAIN NORTH RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF MICHIGAN AND MOUNTAIN WEST RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF MICHIGAN AND MOUNTAIN NORTH RAMP	High Priority	\$ 1,500	2



Description	Priority	Cost	Cost Category
NORTHEAST CORNER OF MICHIGAN AND MOUNTAIN SOUTH RAMP	High Priority	\$ 1,500	2
NORTHEAST CORNER OF MICHIGAN AND MOUNTAIN WEST RAMP	Medium Priority	\$ 1,500	2
NORTHWEST CORNER OF MICHIGAN AND MOUNTAIN EAST RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF MICHIGAN AND MOUNTAIN SOUTH RAMP	High Priority	\$ 1,500	2
SOUTHWEST CORNER OF MICHIGAN AND N. HIGH EAST RAMP	Medium Priority	\$ 2,700	3
SOUTHWEST CORNER OF MICHIGAN AND N. HIGH NORTH RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF MICHIGAN AND S. HIGH WEST RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF MICHIGAN AND S. HIGH NORTH RAMP	High Priority	\$ 1,500	2
NORTHEAST CORNER OF MICHIGAN AND N. HIGH SOUTH RAMP	High Priority	\$ 1,500	2
NORTHEAST CORNER OF MICHIGAN AND N. HIGH WEST RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF MICHIGAN AND N. HIGH EAST RAMP	Medium Priority	\$ 1,500	2
NORTHWEST CORNER OF MICHIGAN AND N. HIGH SOUTH RAMP	High Priority	\$ 1,500	2
NORTHEAST CORNER OF COUNTY LINE AND FACTORY ST WEST RAMP	Low Priority	\$ 1,500	2
NORTHWEST CORNER OF W. FACTORY AND N. SHERMAN EAST RAMP	Low Priority	\$ 1,500	2
SOUTHWEST CORNER OF FACTORY AND N. SHERMAN	Low Priority	\$ 1,500	2
SOUTHEAST CORNER OF FACTORY AND N. SHERMAN	Low Priority	\$ 1,500	2
NORTHEAST CORNER OF FACTORY AND N. SHERMAN	High Priority	\$ 1,500	2
NORTHWEST CORNER OF FACTORY AND N. MOUNTAIN WEST RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF FACTORY AND N. MOUNTAIN WEST RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF FACTORY AND N. MOUNTAIN NORTH RAMP	High Priority	\$ 1,500	2
NORTHEAST CORNER OF FACTORY AND N. MOUNTAIN WEST RAMP	High Priority	\$ 1,500	2
SOUTHWEST CORNER OF W. FACTORY AND N. HIGH EAST RAMP	Medium Priority	\$ 2,700	3
SOUTHWEST CORNER OF W. FACTORY AND N. HIGH NORTH RAMP	High Priority	\$ 4,000	4
SOUTHEAST CORNER OF W. FACTORY AND N. HIGH WEST RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF W. FACTORY AND N. HIGH NORTH RAMP	High Priority	\$ 1,500	2
NORTHEAST CORNER OF W. FACTORY AND N. HIGH SOUTH RAMP	High Priority	\$ 1,500	2
NORTHEAST CORNER OF W. FACTORY AND N. HIGH WEST RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF W. FACTORY AND N. HIGH EAST RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF W. FACTORY AND N. HIGH SOUTH RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF W. STEUBEN AND N. HIGH NORTH RAMP	High Priority	\$ 1,500	2
NORTHEAST CORNER OF W. STEUBEN AND N. HIGH SOUTH RAMP	High Priority	\$ 1,500	2
NORTHEAST CORNER OF W. STEUBEN AND N. HIGH WEST RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF W. STEUBEN AND N. HIGH EAST RAMP	High Priority	\$ 1,500	2
NORTHWEST CORNER OF W. STEUBEN AND N. HIGH SOUTH RAMP	High Priority	\$ 1,500	2
SOUTHWEST CORNER OF W. STEUBEN AND N. HIGH SOUTH RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF W. WAYNE AND S. MOUNTAIN WEST RAMP	High Priority	\$ 1,500	2
SOUTHEAST CORNER OF W. WAYNE AND S. MOUNTAIN NORTH RAMP	High Priority	\$ 1,500	2
NORTHEAST CORNER OF W. WAYNE AND S. MOUNTAIN SOUTH RAMP	High Priority	\$ 1,500	2
NORTHEAST CORNER OF W. WAYNE AND S. MOUNTAIN WEST RAMP	High Priority	\$ 1,500	2
SOUTHEAST CROSSING AT WAYNE AND HIGH	High Priority	\$ 1,500	2
NORTHEAST CORNER OF WAYNE AND HIGH	Medium Priority	\$ 2,700	3
NORTHWEST CORNER OF WAYNE AND HIGH	High Priority	\$ 1,500	2
NORTHWEST CORNER OF TOWN LINE AND N. 018W.	Low Priority	\$ 1,000	1
SOUTHWEST CORNER OF TOWN LINE AND 025 N,	Low Priority	\$ 1,000	1
NORTHWEST CORNER OF TOWN LINE AND 025N.	Low Priority	\$ 1,000	1
NORTHWEST QUADRANT OF TOWN LINE AND SPRING ST	Low Priority	\$ 1,000	1
SOUTHWEST CORNER OF TOWN LINE AT 050N	Low Priority	\$ 1,000	1
NORTHWEST QUADRANT OF TOWN LINE AND MICHIGAN	Low Priority	\$ 1,000	1

<b>Total Low Priority</b>	<b>\$ 54,100</b>
<b>Total Medium Priority</b>	<b>\$ 55,300</b>
<b>Total High Priority</b>	<b>\$ 321,600</b>
<b>Total Curb Ramp Improvements</b>	<b>\$ 431,000</b>



## LAGRANGE SIDEWALKS

Description	Priority	Cost
HAWPATCH FROM UNION TO U.S. 20 EAST SIDE	Medium Priority	\$ 4,560
MEADOWBROOK LN/CR 100 E GOING WEST	Low Priority	\$ 780
PLEASANT, NORTH SIDE, HILLSIDE TO MAPLE	Medium Priority	\$ 20,640
PLEASANT, SOUTHSIDE, HILLSIDE TO MAPLE	Medium Priority	\$ 15,840
PARKWAY, WEST SIDE, PLEASANT TO E. MICHIGAN	Medium Priority	\$ 10,800
PARKWAY, EAST SIDE, PLEASANT TO FAIRVIEW	Medium Priority	\$ 7,560
MICHIGAN, FAIRVIEW TO MAPLE, NORTH SIDE	High Priority	\$ 10,920
MICHIGAN, MAPLE TO N CANAL, NORTH SIDE	High Priority	\$ 9,360
MICHIGAN, CANAL TO SYCAMORE, NORTH SIDE	High Priority	\$ 7,440
MICHIGAN, SYCAMORE TO N WALNUT, NORTH SIDE	High Priority	\$ 7,440
MICHIGAN STREET FROM WALNUT TO N. POPLAR NORTH SIDE	High Priority	\$ 6,000
MICHIGAN STREET FROM N. POPLAR TO SR 9	High Priority	\$ 4,800
MICHIGAN STREET FROM N. POPLAR TO SR 9 SOUTH SIDE	High Priority	\$ 6,960
MICHIGAN STREET FROM N. POPLAR TO WALNUT SOUTH SIDE	High Priority	\$ 7,560
MICHIGAN STREET FROM N. POPLAR TO CANAL SOUTH SIDE	High Priority	\$ 5,520
MICHIGAN FROM CANAL EAST TWO LOTS	High Priority	\$ 6,000
MAPLE FROM PLEASANT TO E NORTH ST	High Priority	\$ 5,040
MAPLE ST SOUTH FROM PLEASANT THREE LOTS (PARTIAL BLOCK)	High Priority	\$ 2,880
E NORTH ST FROM CANAL TO MAPLE	High Priority	\$ 6,240
CANAL FROM NURSERY TO MAPLE	High Priority	\$ 6,480
CANAL FROM MAPLE TO EAST NORTH STREET EAST SIDE	High Priority	\$ 5,760
MAPLE FROM E NORTH TO CANAL WEST SIDE	High Priority	\$ 20,160
EAST NORTH STREET FROM CANAL TO MAPLE NORTH SIDE	High Priority	\$ 4,440
MAPLE FROM E. NORTH ST TO CANAL EAST SIDE	High Priority	\$ 13,800
CANAL FROM E. NORTH TO E. STEUBEN EAST SIDE	High Priority	\$ 5,040
CANAL FROM STEUBEN TO E. LAKE STREET	High Priority	\$ 6,480
CANAL FROM E. LAKE STREET THREE LOTS (PARTIAL BLOCK)	High Priority	\$ 4,080
WALNUT NORTH FROM LAKE THREE LOTS EAST SIDE (PARTIAL BLOCK)	High Priority	\$ 6,480
WALNUT SOUTH FROM LAKE (PARTIAL BLOCK)	High Priority	\$ 720
WALNUT FROM NURSERY TO LAKE ON WEST SIDE	High Priority	\$ 13,080
LAKE FROM DETROIT TO POPLAR NORTH SIDE	High Priority	\$ 4,800
STEUBEN FROM CANAL TO SYCAMORE NORTH SIDE	High Priority	\$ 7,560
STEUBEN FROM SYCAMORE TO WALNUT NORTH SIDE	High Priority	\$ 8,040
STEUBEN FROM WALNUT TO POPLAR NORTH SIDE	High Priority	\$ 8,040
STEUBEN FROM POPLAR TO DETROIT NORTH SIDE	High Priority	\$ 7,080
FACTORY FROM SYCAMORE TO DETROIT NORTH SIDE	High Priority	\$ 5,880
SPRING FROM CHERRY TO SOUTH CANAL NORTH SIDE	High Priority	\$ 12,720
SPRING FROM CANAL TO SYCAMORE NORTH SIDE	High Priority	\$ 7,584
SPRING FROM SYCAMORE NORTH WALNUT NORTH SIDE	High Priority	\$ 8,640
SPRING FROM WALNUT TO POPLAR NORTH SIDE	High Priority	\$ 3,360
SPRING FROM POPLAR TO DETROIT NORTH SIDE	High Priority	\$ 3,600
SPRING FROM POPLAR TO DETROIT SOUTH SIDE	High Priority	\$ 3,840
SPRING FROM POPLAR TO WALNUT SOUTH SIDE	High Priority	\$ 6,480
LAFAYETTE FROM WALNUT TO POPLAR NORTH SIDE	High Priority	\$ 7,200
LAFAYETTE FROM POPLAR TO DETROIT NORTH SIDE	High Priority	\$ 7,200
LAFAYETTE FROM POPLAR TO DETROIT SOUTH SIDE	High Priority	\$ 5,880

Description	Priority	Cost
LAFAYETTE FROM POPLAR TO WALNUT SOUTH SIDE	High Priority	\$ 4,080
WAYNE FROM POPLAR TO WALNUT NORTH SIDE	High Priority	\$ 2,160
WAYNE FROM POPLAR TO DETROIT NORTH SIDE	High Priority	\$ 5,160
WAYNE FROM POPLAR TO DETROIT SOUTH SIDE	High Priority	\$ 6,960
S. CANAL FROM E. WAYNE TO E. SPRING ON EAST SIDE	Medium Priority	\$ 4,560
S. CANAL FROM E. SPRING TO EAST MICHIGAN ON EAST SIDE	High Priority	\$ 7,440
N. CANAL FROM E. MICHIGAN TO FACTORY ON EAST SIDE	High Priority	\$ 9,480
N. CANAL FROM E. MICHIGAN TO E. STEUBEN ON EAST SIDE	High Priority	\$ 9,480
N. CANAL FROM E. STEUBEN TO FACTORY ON WEST SIDE	High Priority	\$ 7,440
N. CANAL FROM E. FACTORY TO E. MICHIGAN ON WEST SIDE	High Priority	\$ 6,360
N. CANAL FROM E. MICHIGAN TO E. SPRING ON WEST SIDE	High Priority	\$ 6,000
SYCAMORE FROM SPRING TO E. MICHIGAN ON EAST SIDE	High Priority	\$ 7,200
SYCAMORE FROM E. MICHIGAN TO E. FACTORY ON EAST SIDE	High Priority	\$ 7,800
SYCAMORE FROM E. FACTORY TO E. STEUBEN ON EAST SIDE	High Priority	\$ 7,680
SYCAMORE FROM E. STEUBEN TO E. LAKE ON EAST SIDE	High Priority	\$ 7,680
SYCAMORE FROM E. LAKE TO E. STEUBEN ON WEST SIDE	High Priority	\$ 7,680
SYCAMORE FROM E. STEUBAN TO E. FACTORY ON WEST SIDE	High Priority	\$ 7,800
SYCAMORE FROM E. FACTORY TO E. MICHIGAN ON WEST SIDE	High Priority	\$ 7,800
WALNUT FROM E. SPRING TO LAFAYETTE	High Priority	\$ 6,000
POPLAR FROM E. LAKE TO STEUBEN WEST SIDE	High Priority	\$ 7,800
POPLAR FROM STEUBEN TO E. FACTORY ON WEST SIDE	High Priority	\$ 6,720
POPLAR FROM E. FACTORY TO MICHIGAN ON WEST SIDE	High Priority	\$ 7,800
POPLAR FROM E. MICHIGAN TO E. SPRING ON WEST SIDE	High Priority	\$ 5,400
POPLAR FROM E. SPRING TO LAFAYETTE ON WEST SIDE	High Priority	\$ 7,800
POPLAR FROM LAFAYETTE TO E. WAYNE ON WEST SIDE	High Priority	\$ 5,640
POPLAR FROM WAYNE TO S.R. 20 ON WEST SIDE	Medium Priority	\$ 2,640
POPLAR FROM WAYNE TO S.R. 20 ON EAST SIDE	High Priority	\$ 3,480
POPLAR FROM WAYNE TO LAFAYETTE ON EAST SIDE	Medium Priority	\$ 6,720
POPLAR FROM LAFAYETTE TO SPRING ON EAST SIDE	High Priority	\$ 10,200
POPLAR FROM SPRING TO E. MICHIGAN ON EAST SIDE	High Priority	\$ 7,680
POPLAR FROM E. MICHIGAN TO FACTORY ON EAST SIDE	High Priority	\$ 7,800
POPLAR FROM U.S. 20 TO E. SEYMOUR ON WEST SIDE	High Priority	\$ 1,800
POPLAR FROM E. SEYMOUR TO E. CLAY ON WEST SIDE	High Priority	\$ 5,400
POPLAR FROM E. CLAY TO FENN ON WEST SIDE	High Priority	\$ 5,040
POPLAR FROM FENN TO E. CLAY ON EAST SIDE	Low Priority	\$ 8,040
POPLAR FROM E. CLAY TO RYASON ON EAST SIDE	Low Priority	\$ 4,800
POPLAR FROM RYASON TO U.S. 20 ON EAST SIDE	Low Priority	\$ 6,600
RYASON FROM POPLAR TO WALNUT ON SOUTH SIDE	Medium Priority	\$ 6,720
SEYMOUR FROM POPLAR TO S.R. 9 ON SOUTH SIDE	Medium Priority	\$ 2,520
SEYMOUR EAST OF POPLAR ON SOUTH SIDE	Medium Priority	\$ 2,400
SOUTH STREET FROM S.R. 9 TO HAWPATCH ON SOUTH SIDE	Low Priority	\$ 20,160
UNION FROM SOUTH STREET TO W. BELL EAST SIDE	High Priority	\$ 28,080
UNION FROM E. FENN TO W. CLAY EAST SIDE	High Priority	\$ 7,080
UNION FROM W. CLAY TO W. SEYMOUR EAST SIDE	High Priority	\$ 6,240
UNION FROM W. SEYMOUR TO HAWPATCH EAST SIDE	Low Priority	\$ 6,480
HAWPATCH FROM UNION TO W. SEYMOUR ON EAST SIDE	Low Priority	\$ 3,120
HAWPATCH FROM W. SEYMOUR TO W. FENN ON EAST SIDE	Low Priority	\$ 4,680

Description	Priority	Cost
HAWPATCH FROM W. FENN TO W. BELL ON EAST SIDE	Low Priority	\$ 9,360
HAWPATCH FROM W. BELL TO SOUTH STREET ON EAST SIDE	Low Priority	\$ 9,360
UNION STREET FROM W. SOUTH TO W. BELL ON WEST SIDE	High Priority	\$ 6,720
UNION STREET FROM W. FENN TO W. CLAY ON WEST SIDE	High Priority	\$ 11,400
UNION STREET FROM SEYMOUR TO HAWPATCH ON WEST SIDE	Low Priority	\$ 840
SEYMOUR FROM UNION TO HAWPATCH ON SOUTH SIDE	Medium Priority	\$ 5,400
BELL FROM UNION WEST (PARTIAL BLOCK)	High Priority	\$ 3,600
MAPLE RIDGE TO SOUTH ST	Low Priority	\$ 2,400
FENN FROM HAWPATCH EAST (PARTIAL BLOCK)	Medium Priority	\$ 2,040
HAWPATCH FROM US 20 TO GUM STREET ON WEST SIDE	Low Priority	\$ 4,680
HAWPATCH FROM GUM STREET TO W. CHURCH ON WEST SIDE	Low Priority	\$ 4,680
HAWPATCH FROM W. CHURCH TO ORCHARD STREET ON WEST SIDE	Low Priority	\$ 3,120
HAWPATCH FROM ORCHARD HILL STREET SOUTH ON WEST SIDE	Low Priority	\$ 1,560
CHURCH FROM HAWPATCH WEST ON NORTH SIDE	Medium Priority	\$ 1,800
GUM FROM HAWPATCH WEST TO VINE ON NORTH SIDE	Medium Priority	\$ 7,800
VINE FROM W. GUM TO US. 20 ON THE EAST SIDE	Medium Priority	\$ 6,960
VINE FROM US. 20 TO W. CHURCH ON THE WEST SIDE	Medium Priority	\$ 15,000
GRANT FROM SHERMAN TO S. MOUNTAIN ON SOUTH SIDE	Low Priority	\$ 4,440
W. LAFAYETTE FROM MOUNTAIN TO S. HIGH ON SOUTH SIDE	Medium Priority	\$ 2,520
W. LAFAYETTE FROM HIGH TO DETROIT ON SOUTH SIDE	High Priority	\$ 2,880
W. LAFAYETTE FROM HIGH TO DETROIT ON NORTH SIDE	High Priority	\$ 4,080
W. LAFAYETTE FROM HIGH TO MOUNTAIN ON NORTH SIDE	Medium Priority	\$ 3,240
GRANT FROM S. MOUNTAIN TO S. SHERMAN	Low Priority	\$ 4,800
GRANT STREET FROM MOUNTAIN TO N. SPRING ON SOUTH SIDE	High Priority	\$ 9,120
W. SPRING FROM N. TOWN LINE TO S. SHERMAN ON SOUTH SIDE	High Priority	\$ 8,640
W. SPRING FROM N. SHERMAN TO S. MOUNTAIN ON SOUTH SIDE	High Priority	\$ 5,400
W. SPRING FROM N. MOUNTAIN TO HIGH ON SOUTH SIDE	Low Priority	\$ 5,400
W. SPRING FROM DETROIT TO HIGH ON SOUTH SIDE	High Priority	\$ 5,400
W. SPRING DETROIT TO HIGH ON NORTH SIDE	Low Priority	\$ 720
W. SPRING FROM MICHIGAN TO N. MOUNTAIN ON NORTH SIDE	Low Priority	\$ 960
W. SPRING FROM N. MOUNTAIN TO S. SHERMAN ON NORTH SIDE	Low Priority	\$ 3,600
W. SPRING FROM N. SHERMAN TO TOWN LINE ROAD ON NORTH SIDE	High Priority	\$ 7,920
MICHIGAN FROM TOWN LINE TO S. SHERMAN ON SOUTH SIDE	High Priority	\$ 9,000
MICHIGAN FROM SHERMAN TO S. MOUNTAIN ON SOUTH SIDE	High Priority	\$ 9,600
MICHIGAN FROM S. MOUNTAIN TO HIGH ON SOUTH SIDE	High Priority	\$ 7,680
MICHIGAN FROM S. HIGH TO DETROIT ON SOUTH SIDE	Low Priority	\$ 720
MICHIGAN FROM DETROIT TO N. HIGH ON NORTH SIDE	Medium Priority	\$ 4,080
MICHIGAN FROM N. HIGH TO N. MOUNTAIN ON NORTH SIDE	High Priority	\$ 4,680
MICHIGAN FROM N. MOUNTAIN TO N. SHERMAN ON NORTH SIDE	Medium Priority	\$ 6,240
MICHIGAN FROM N. SHERMAN TO TOWN LINE ON NORTH SIDE	High Priority	\$ 4,800
FACTORY FROM TOWN LINE TO SHERMAN ON NORTH SIDE	Low Priority	\$ 1,920
SHERMAN FROM FACTORY NORTH ON EAST SIDE	High Priority	\$ 7,800
SHERMAN FROM LIGHTING HILL APTS TO N. MOUNTAIN NORTH SIDE	Low Priority	\$ 840
FACTORY FROM N. MOUNTAIN TO N. HIGH ON SOUTH SIDE	High Priority	\$ 3,960
FACTORY FROM N. HIGH TO DETROIT ON SOUTH SIDE	High Priority	\$ 7,320
FACTORY FROM DETROIT TO N. HIGH ON NORTH SIDE	High Priority	\$ 6,840
FACTORY FROM N. HIGH TO N. MOUNTAIN ON NORTH SIDE	High Priority	\$ 7,440



<b>Description</b>	<b>Priority</b>	<b>Cost</b>
W. STEUBEN FROM DETROIT TO N. HIGH ON SOUTH SIDE	Medium Priority	\$ 2,400
W. STEUBEN FROM DETROIT TO N. HIGH ON NORTH SIDE	High Priority	\$ 4,800
W. STEUBEN FROM N. HIGH TO N. MOUNTAIN ON NORTH SIDE	High Priority	\$ 8,040
N. HIGH FROM STEUBEN TO WEST LAKE EAST SIDE	High Priority	\$ 7,824
N. HIGH FROM STEUBEN TO WEST LAKE WEST SIDE	High Priority	\$ 7,920
W. WAYNE FROM S. MOUNTAIN TO DETROIT SOUTH SIDE	High Priority	\$ 12,600
W. WAYNE FROM DETROIT TO S. HIGH NORTH SIDE	Low Priority	\$ 1,320
W. WAYNE FROM S. HIGH TO S. MOUNTAIN NORTH SIDE	Medium Priority	\$ 3,600
N. SHERMAN FROM STEUBEN TO W. NORTH STREET ON EAST SIDE	High Priority	\$ 13,440
W. NORTH STREET FROM SHERMAN WEST ON NORTH SIDE	High Priority	\$ 6,000
W. SHERMAN FROM FACTORY TO W. MICHIGAN ON WEST SIDE	High Priority	\$ 7,320
W. SHERMAN FROM MICHIGAN TO SPRING ON WEST SIDE	High Priority	\$ 165
W. SHERMAN FROM SPRING TO GRANT ON WEST SIDE	High Priority	\$ 6,720
W. SHERMAN FROM GRANT TO US 20 ON WEST SIDE	High Priority	\$ 7,200
S. SHERMAN FROM US 20 TO GRANT ON EAST SIDE	High Priority	\$ 8,640
S. SHERMAN FROM GRANT TO SPRING ON EAST SIDE	High Priority	\$ 7,680
S. SHERMAN FROM SPRING TO MICHIGAN ON EAST SIDE	High Priority	\$ 3,840
N. SHERMAN FROM MICHIGAN TO W. FACTORY ON EAST SIDE	High Priority	\$ 5,160
N. MOUNTAIN FROM FACTORY TO MICHIGAN ON WEST SIDE	High Priority	\$ 6,600
N. MOUNTAIN FROM MICHIGAN TO SPRING ON WEST SIDE	Medium Priority	\$ 4,200
S. MOUNTAIN FROM SPRING TO GRANT ON WEST SIDE	High Priority	\$ 7,200
S. MOUNTAIN FROM GRANT TO US 20 ON WEST SIDE	High Priority	\$ 9,600
S. MOUNTAIN FROM US 20 TO WAYNE ON EAST SIDE	High Priority	\$ 2,640
S. MOUNTAIN FROM WAYNE TO LAFAYETTE ON EAST SIDE	High Priority	\$ 5,880
S. MOUNTAIN FROM LAFAYETTE TO SPRING ON EAST SIDE	High Priority	\$ 5,760
S. MOUNTAIN FROM SPRING TO MICHIGAN ON EAST SIDE	High Priority	\$ 5,760
N. MOUNTAIN FROM MICHIGAN TO FACTORY ON EAST SIDE	High Priority	\$ 5,760
N. HIGH FROM STEUBEN TO FACTORY ON WEST SIDE	Medium Priority	\$ 7,440
N. HIGH FROM FACTORY TO MICHIGAN ON WEST SIDE	High Priority	\$ 4,200
N. HIGH FROM MICHIGAN TO SPRING ON WEST SIDE	Low Priority	\$ 480
N. HIGH FROM LAFAYETTE TO WAYNE ON WEST SIDE	High Priority	\$ 3,840
S. HIGH FROM WAYNE TO LAFAYETTE ON EAST SIDE	Medium Priority	\$ 11,160
S. HIGH FROM LAFAYETTE SPRING ON EAST SIDE	Medium Priority	\$ 3,000
S. HIGH FROM SPRING TO MICHIGAN ON EAST SIDE	Low Priority	\$ 600
N. HIGH FROM MICHIGAN TO FACTORY ON EAST SIDE	High Priority	\$ 4,440
N. HIGH FROM FACTORY TO STEUBEN ON EAST SIDE	High Priority	\$ 6,360
TOWN LINE FROM N. 018W to 025N ON WEST SIDE	Low Priority	\$ 960
TOWN LINE FROM 025N to 050N ON WEST SIDE	Low Priority	\$ 240

<b>Total Low Priority</b>	<b>\$ 117,660</b>
<b>Total Medium Priority</b>	<b>\$ 171,840</b>
<b>Total High Priority</b>	<b>\$ 838,413</b>
<b>Total Sidewalk Improvements</b>	<b>\$ 1,127,913</b>

## **Appendix C**

### **Town Department Questionnaire**



# **Americans with Disabilities Act Self-Evaluation Program, Services, and Activities Questionnaire Town of LaGrange, Indiana**

The ADA prohibits the denial of services or benefits to persons with disabilities. In the performance of common, every day services provided by local units of government, you must ensure that all services are available in some way to persons with all disabilities. To better allow us to understand each department's interactions with the public, we request that you complete this questionnaire. Your responses are vital to ensuring that modifications can be made throughout the Town to ensure access to all programs and services, if necessary. Please discuss with your staff as needed to provide thorough, complete, and accurate responses to each question. The information provided is intended to allow for changes throughout the Town to provide equal access to programs and activities to everyone, without exception.

- A. Verify the list of Town Departments and location (include address). Provide a short description of the primary duties of each department and any payments, publications, applications, forms, etc. that are used for each.

- Administration – Town Hall, 1201 N. Townline
- Clerk-Treasurer – same
- Fire Department – same
- Police Department – same
- Wastewater Department – 402 Nursery
- Street Department

- B. List all appointed boards and commissions and when and where they meet:

**LaGrange Town Council, 1<sup>st</sup> & 3<sup>rd</sup> Mondays of the month**

**LaGrange Redevelopment Commission – when needed, posted in the Town Hall, and notice given to the media.**

- C. Do all meeting rooms that hold public meetings have an audio system (microphones and speakers)? Do they have any assistive listening devices for the hearing impaired? If so, how many and what type.

**We have an audio system, but not listening devices**

- D. Is there a poster for "Equal Opportunity is the Law" that describes the requirements of Title VII of the Civil Rights Act located somewhere in Town buildings? If so, where (include all locations).

**Town hall, Wastewater Plant**

- E. How are public meetings (especially Town Council) publicized? Are agendas posted in Town Hall and on the web site? Do the agendas have an ADA statement of accommodation on them? Provide a typical copy of a recent agenda for all public meetings.

**Meetings are posted in the Town Hall. We do not have an ADA Statement.**

- F. Please provide DLZ with a copy (electronic preferred) of the Town's Personnel Policy Manual and Application for Employment (if not available on the web site).

**Will send attachment**

- G. To date, has the Town appointed an ADA Coordinator? If so provide information on the date, copies of resolutions/ordinances, etc.

**Will be discussed on 2/4/2013**

- H. To date, has the Town published a Non-Discrimination Notice, adopted the ADA standards, published a Grievance Procedure, and/or developed a Grievance Form? Include copies of any documentation, resolutions, etc.

**In Progress**

- I. Are you aware of any formal training of non-police personnel related to ADA specifically? If so, note who has taken training and the date, location, and provider of the training.

**No**

- J. Are you aware of any instances where Town staff has interacted with persons with disabilities and altered their normal procedures to accommodate them in some way? Please describe and be specific.

**We receive TDD phone calls**

- K. Do you allow any community groups, etc. to use Town facilities for meetings, picnics, etc., including parks? If so, provide a copy of any lease agreements.

**We allow citizens to use the park pavilions. We do not have lease agreements, There are no charges involved.**

- L. Are emergency procedures in place at Town facilities for evacuation in the event of an emergency? Are emergency assembly or shelter areas identified for each building? Please identify.

**Not that I'm aware of**

- M. Please list any special events that the Town sponsors or participates in some way (parades, carnivals, flea markets, etc.). Include location of events, duration, etc. and any documentation you can so we can understand what happens for each.

**None**

- N. Has the Town ever been asked to provide special accommodation for printed materials? If so what was requested and provided?

**No**

- O. Do any Town facilities have Telecommunication Devices for the Deaf (TDD) or access to a relay service to communicate to persons with hearing loss?

**No**

- P. Who is the website developer for the Town? How often is it updated? Who is the contact person to discuss the website with (name and phone number/e-mail)?

**Robert Grove – ecredibledesigns**

**269-625-1634**

**robert@ecredibledesigns.com**

- Q. Who at the Town is the “Human Resources” person? Name and contact information is needed.

**Laurie Miller – 260-463-3241 - lmiller@lagrangein.org**

- R. Does the Town own all the buildings that provide services to the public? Does the Town lease any buildings to someone else for their use? If yes for either, provide detail about the address, owner, and functions provided there.

**We don't lease any buildings. The Park is open for public use**

- S. Is someone at the Town designated as the liaison with the County EMA? If so identify by name and contact info.

**Will be discussed on 2/4/2013**

- T. Indiana Code 5-2-1-9(g) requires all police officers to undergo annual training how to interact with people with mental illness, addictive disorders, mental retardation (intellectual disability), autism, and developmental disabilities. Have all officers completed this training? If so, when was the last training sessions held. Has anyone at the PD had any other formal training on interacting with persons with disabilities?

**Went to training on 5/17/2012 and 12/4/2012**

- U. Are any formal programs offered at Town Parks? If so, how do people register for them? Do you have a printed quarterly or other publication that is used to advertise programs and allow people to sign up for them? If so provide a copy (electronic is acceptable).

**No formal programs at this time**

- V. Are there any specific suggestions or thoughts anyone at the Town has regarding how programs could be made more accessible to persons with disabilities? Training you think would be especially helpful for anyone at the Town?

**Not at this time.**





# **Appendix D**

## **Public Outreach**

### **Initial Public Input**

Public Notice  
Proof of Publication  
Summary

### **Draft Availability for Public Comment**

Public Notice  
Proof of Publication  
Summary



The preceding letter was sent to the following advocacy groups and contacts:

Deb Finchum - Advocacy Angels, Warsaw IN

Suellen Jackson-Boner - Indiana Governor's Council for People With Disabilities

LaGrange County Council on Aging

Great Lakes ADA Center

Passages - Tom O'Neil - Columbia City IN

Easter Seals Arc of NE Indiana - FT Wayne IN

League for the Blind and Disabled - David Nelson

Arc of LaGrange County - Jeff Bassett

Indiana Institute on Disability and Community - David Mank

IN\*Source - Rich Burden - South Bend IN

Indiana Council on Independent Living - Indianapolis

## NOTICE OF PUBLIC COMMENT PERIOD

The Town of LaGrange is conducting a Self-Evaluation of all Town-owned facilities, public right-of-way, and programs for compliance with the Americans with Disabilities Act (ADA) and preparing a Transition Plan describing the results of the self-evaluation. Title II of the ADA requires that each of the Town's services, programs, and activities be readily accessible and usable by individuals with disabilities.

The Town is soliciting public input, especially from persons with disabilities, their caregivers, and disability advocates on what barriers to access or use of Town facilities or programs exist or are perceived to exist. This will also be an opportunity for the community to provide suggestions and comments on how to remove barriers. All comments will be reviewed and considered for inclusion in the self-evaluation and transition plan.

Public comments may be dropped off in writing or mailed to the Clerk-Treasurer's office at Town Hall (1201 N. Townline Road, LaGrange, IN 46761) during normal business hours or provided via email to [lmiller@lagrangein.org](mailto:lmiller@lagrangein.org). The comment period will be open for 14 days, commencing on May 6, 2013 and ending on May 21, 2013.

The Town of LaGrange complies with the Americans with Disabilities Act. Upon request, the Town will provide written materials in appropriate alternative formats, or disability-related modification or accommodation, including auxiliary aids or services, to enable individuals with disabilities to participate in public input. Please send a written request, including your name, mailing address, phone number and brief description of the requested accommodation at least three (3) business days prior to the close of the comment period to the ADA Coordinator, Laurie D. Miller, IAMC, 1201 N. Townline Road, LaGrange, IN 46761.



April 25, 2013

Deb Finchum  
Advocacy Angels  
504 North Bay Drive  
Warsaw, IN 46580-4627

Dear Ms. Finchum:

The Town of LaGrange is conducting a Self-Evaluation Study of all Town-owned facilities and programs for compliance with the Americans with Disabilities Act (ADA). Title II of the ADA requires that each of the Town's services, programs, and activities be readily accessible and usable by individuals with disabilities. Title II also requires public outreach to the community, especially persons with disabilities, their caregivers, and advocacy groups for the disabled. The Town is sending this letter to solicit public input and comment on barriers that exist, or are perceived to exist, to persons with disabilities to access Town programs.

We welcome your input to assist us on this project. Comments can be provided in writing via either U.S. Mail or e-mail. Comments can be submitted to Laurie D. Miller, IAMC, Clerk-Treasurer, at Town Hall via U.S. mail or hand-delivery or via e-mail at [lmiller@lagrangein.org](mailto:lmiller@lagrangein.org). All comments will be reviewed and considered and included in the final document. Please feel free to pass the information about this project on to others that you believe might be interested in providing input or comments. The comment period will be open for 14 days, commencing on May 6, 2013 and ending on May 20, 2013.

The Town of LaGrange complies with the Americans with Disabilities Act. Upon request, the Town will provide written materials in appropriate alternative formats, or disability-related modification or accommodation, including auxiliary aids or services, to enable individuals with disabilities to participate in public meetings. Please send a written request, including your name, mailing address, phone number and brief description of the requested materials and preferred alternative format or auxiliary aid or service. If auxiliary aids or services are required for individuals with disabilities, please contact me at Town Hall at:

1201 N. Townline Road  
LaGrange, IN 46761  
(260) 463-3241

Please let me know if you have any questions and I look forward to your comments and questions.

Sincerely,

Laurie D. Miller, IAMC  
Clerk-Treasurer/ADA Coordinator



The preceding letter was sent to the following advocacy groups and contacts:

Deb Finchum - Advocacy Angels, Warsaw IN

Suellen Jackson-Boner - Indiana Governor's Council for People With Disabilities

LaGrange County Council on Aging

Great Lakes ADA Center

Passages - Tom O'Neil - Columbia City IN

Easter Seals Arc of NE Indiana - FT Wayne IN

League for the Blind and Disabled - David Nelson

Arc of LaGrange County - Jeff Bassett

Indiana Institute on Disability and Community - David Mank

IN\*Source - Rich Burden - South Bend IN

Indiana Council on Independent Living - Indianapolis

May 7, 2013

Laurie D. Miller, IAMC  
Clerk-Treasurer/ADA Coordinator  
1201 N. Townline Road  
LaGrange, IN 46761

RE: Self-Evaluation Study

In regards to the Self-Evaluation Study the Council on Aging, Aging in Place Committee has the following suggestions for the town of LaGrange and/or County of LaGrange:

We recognize the repair to the sidewalk and ramp assisting with accessibility to the west entrance of the County Office Building (North High Street entrance) and the return of one parking space. An automatic door would make entry easier for west entry patrons.

We recommend the LaGrange Town Hall have an automatic door.

We recommend the accessible parking on the steep hill of East Lafayette Street be moved to the front of Elijah Haven on South Detroit Street.

We recommend marking accessible parking space/s in front of Courthouse on North Detroit Street with blue paint lines & wheelchair symbol on the street. The two-way arrow indicates more than one space.

We recommend adding van spots or left accessible parking without obstructions such as electric poles and signs in town. Currently there are no spots for vans on public property.

We recommend the Court House curbs all be accessible.

We believe the ramp at the Court House does not meet grade code and a plan for correction addressed. This could be an outside lift, regarding, reconfiguring to make it ADA code compliant.

We recommend first parking space next to the Post Office at the stop sign on W. Wayne Street at the corner of South Detroit Street be accessible parking.

We recommend a joint effort of town and business owners work together to find solutions to comply with ADA codes. We recognized the challenges of the businesses on the west side of Detroit have additional challenges to meet codes with the higher sidewalks and curbs.

Regardless of ability the crosswalk light, at Detroit and Central (State Routes 9 and 20), changes too fast for anyone to cross safely. This was changed in the past at Aging in Place Committee's request but is now changed back to an unsafe time frame.

We recommend property owners clean and edge their sidewalks to contribute to accessible neighborhoods and ease of movement for community members.

We recommend the town have guidelines for the repair, replacement and new construction of sidewalks be included in your accessibility plan. This plan should be jointly embraced by all towns and the county governing agencies and ADA compliant.

The Aging In Place Committee is working toward a "Livable Community For All Ages" and have included our working paper on recommendations for livability. We welcome your questions or feedback on our recommendations.

## **LaGrange County Council on Aging, Aging In Place Committee**

### **Livable Communities For all Ages**

In April 2009 the Lagrange County Council on Aging invited Dr. Phil Stafford, Director of the Center on Aging and Community, at the Institute on Disability and Community, at Indiana University in Bloomington, to meet with LaGrange community leaders and residents to talk about Livable Communities for all ages. At that meeting we divided into 4 groups of 10. Each group's mission was to determine what was needed to make Lagrange a Livable Community for all ages. Participant ages included teen leaders through retired persons.

Each group ranked number one the condition or lack of good sidewalks. All felt this was important for seniors as well as young families to be able to get out and be active in the community. The condition of the sidewalks was a concern from the first meeting of Aging in Place two years prior as well. The Aging in Place committee meets the first Tuesday of the month to act on the ramp project and then moved to collecting data and pictures of the condition of sidewalks, handicapped parking places, and lack of sidewalks in certain areas. During the summer of 2011 we met several times with an intern from the Planning Commission to share our information and the information collected by the local AARP. From these meetings the LaGrange Trails Report was created. With the data in that report we have put together recommendations that will provide a starting point to improve current sidewalks and in time provide for new sidewalks. At the same time creation of trails that will provide for biking, running and the connection of communities should be planned.

We understand that times are hard for everyone. It is not our desire to put a burden on any one person or entity. The following recommendations and the data in the LaGrange trails report allow for the implementation of a sidewalk and trails program that can lead us into the future of a livable Community for all ages. It is our hope that the Planning Commission and the Building Department can put these recommendations in place to build a better LaGrange County.

### **Sidewalk Recommendations**

In LaGrange County as in other counties the sidewalks are the responsibility of the property owner. If a person is hurt as a result of a sidewalk's condition, the homeowner can be sued for the damages. If the sidewalk was found to be in poor condition because of homeowner neglect, the homeowners could be paying for damages out of their pocket instead of their homeowners' insurance covering the bill. Since many of the sidewalks are in need of repair we ask that each town send a letter with the water bill (if possible) advising landowners to look at their sidewalk condition and to repair or replace as needed. This should be done as soon as possible, since we suspect that many homeowners feel it is the town's responsibility to maintain the sidewalk. If grants can be secured to fund a low interest loan, they can be offered to help with the repairs. Homeowners can do the repair or replacement if they meet guidelines from the building department.

All new home construction within city limits or subdivisions connected to a town within one mile and with more than five homes platted will have a sidewalk as part of the site plan to connect to neighboring properties. This will start when adopted by the plan commission and be a part of all new building permits in LaGrange County.

Grants for sidewalks connecting the schools and 4-H Fair Grounds to the community should be sought to provide a safe way of travel for students and their families to and from their home to their community schools and parks. When granted, these sidewalks need to be installed.

A new factory or business constructed within one mile of town limits should have a sidewalk in the site plan and be a part of the building permit. Old business property when undergoing a major remodel or face lift should have to include a replacement or repair of sidewalks to meet ADA entrance requirements. This should also include a change of use for the building.

**From:** Beverly Harding [<mailto:advocacycoordbah@yahoo.com>]

**Sent:** Thursday, May 23, 2013 9:19 AM

**To:** [lmiller@lagrangein.org](mailto:lmiller@lagrangein.org)

**Subject:** Re:Comments from survey

Although you have a delightful town we did find a few things to suggest: The town hall's parking lot had no van accessible spot, so Carmen discussed with Laurie making that last space a van accessible by striping the blue parallel stripes which would allow a lift to come down in a conversion van, at least 96 in. wide. We discussed putting in a push button to open the doors for people with disabilities because doors were too heavy.

There were enough Accessible spots upfront and within the allotted 500 feet of entrance. Also curb cuts were accessible for those who maybe in a walker or wheel chair.

Fire Department meeting room was accessible. The door entrances were well over 32 inches there were turnaround room for those who have will chairs or walkers. The bathrooms were accessible had grab bars around the toilets and good turnaround room of 96 inches or more.

Police Department Office Rich Snyder gave tour of his department and everything was accessible. Even the interrogation room was accessible all of the doorways were well over 32 inches.

There was a county office across from court house. There were no push buttons on doors and had no curb cuts.

Courthouse was built in 1887 but did have a ramp leading down in the basement where there was an elevator and stairs did have inside and outside push buttons for the doors. Restrooms down stairs basements had a cabinet instead of open area of sinks and turnaround room in the accessible bathroom was only 40 inches and should be at least 96 inches in the women's bathroom. The paper towels, soap dispenser and light switches were too high. They were well over 48 inches from the floor.

The second floor was circuit court and OSS school. We took a tour of the courtroom the ceiling was very beautiful and looked like the sixteen chapel. The area where the lawyers and judge located had a ramp to enter the area.

The first floor housed the clerk, small claims superior courts, traffic violation, voters registration. people were occupying those areas appeared to be ok.

The town park located on Factory and Steuben there was no accessible route to the playground from the street. I did see a gate on the side but there was gravel in front of it and there were no designated spots to park. There were no sidewalks to access the pavilion.

We enjoyed meeting Laurie and here are the comments. Let me know what the outcome is. My email address is [terrellcarmen@yahoo.com](mailto:terrellcarmen@yahoo.com)

In the town hall the police and fire dept. is located on each side of the town hall. We took a tour of the fire department their meeting room was large enough to accommodate someone in a chair.

Carmen Terrell/ Beverly Harding



## NOTICE OF AVAILABILITY OF ADA SELF-EVALUATION AND TRANSITION PLAN

The Town of LaGrange has conducted a Self-Evaluation of all Town-owned facilities and all Town programs for compliance with the Americans with Disabilities Act (ADA) and prepared a draft Transition Plan describing the results of the self-evaluation. Title II of the ADA requires that each of the Town's services, programs, and activities be readily accessible and usable by individuals with disabilities.

Copies of the draft Self-Evaluation and Transition Plan will be available for public review at the following locations between August 26, 2013 and September 9, 2013:

- ADA Coordinator's Office/Town Hall – 1201 N. Townline Road
- LaGrange County Public Library – 203 W. Spring Street

Comments can be provided, in writing, by the deadline of September 9, 2013 at 4 p.m. to Laurie Miller, ADA Coordinator, 1201 N. Townline Rd., LaGrange, IN 46761

In addition, the Town has scheduled a meeting to solicit public input and comment on the Transition Plan, and will consist of a short presentation at the beginning of the meeting to provide information on the Transition Plan, followed by open discussion and interaction with attendees. This will be an opportunity for the community to ask questions as well as provide suggestions and comments on the draft Self-Evaluation and Transition Plan. All comments will be reviewed, considered and included in the appendix of the document. The meeting will be held at LaGrange Town Hall on Tuesday, September 3, 2013 at 7 pm. It is the intention of the Town Council to adopt the Self-Evaluation and Transition Plan at their next regular meeting.

The Town of LaGrange complies with the Americans with Disabilities Act. Upon request, the Town will provide written materials in appropriate alternative formats, or disability-related modification or accommodation, including auxiliary aids or services, to enable individuals with disabilities to participate in public meetings. Please send a written request, including your name, mailing address, phone number and brief description of the requested materials and preferred alternative format or auxiliary aid or service at least three (3) business days prior to the meeting to the ADA Coordinator at 260-463-3241.

# **Appendix E**

## **Forms and Notices**

### **Resolutions and Ordinances**

Ordinance – Grievance Procedure and Standards

### **Grievance Procedure**

### **Excerpts from Personnel Policy Manual**

Section II – Non-Discrimination Notice



**ORDINANCE NUMBER 2013-2-4**  
**AN ORDINANCE OF THE BOARD OF TRUSTEES OF THE**  
**TOWN OF LAGRANGE, INDIANA, ADOPTING THE NOTICE UNDER THE**  
**AMERICANS WITH DISABILITIES ACT AND THE GRIEVANCE PROCEDURE**

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**Whereas**, it is required of the Town of LaGrange under the Americans with Disabilities Act to establish a Grievance Procedure and separate Notice under the Americans with Disabilities Act which shall be on file for public inspection at Town Hall, 1201 North Townline Road, Larange, Indiana, and on the Town of LaGrange Website ([www.lagrangein.org](http://www.lagrangein.org)). That additionally anyone shall be provided copies of the Notice and Grievance Procedure free of charge at that person's request. Requests for alternate formats of either document should be provided to the Town of LaGrange, all reasonable requests will be accommodated.

**Whereas**, The Town of LaGrange also believes that it is in the best interests of its citizens to establish a Grievance Procedure and separate Notice under the Americans with Disabilities Act.

Now, therefore, the Board of Trustees of the Town of LaGrange states as follows:

1. The Town of LaGrange Grievance Procedure and separate Notice under the Americans with Disabilities Act are hereby established effective immediately upon the passage of this Ordinance. The Town of LaGrange adopts the 2010 Americans with Disabilities Act Standards for Accessible Design and the 2005 Guidelines for Accessible Pub(lic Rights-of-Way, including any future updates to either document enforceable by the U.S. Department of Justice or other Federal agency with jurisdiction.
2. The Town of LaGrange shall have on file for public inspection the Grievance Procedure and Notice in Town Hall, LaGrange, IN and shall post them on the Town of LaGrange, IN Website. That additionally anyone shall be provided copies of the Notice and Grievance Procedure free of charge at that person's request, including copies in alternate formats.

**SEVERABILITY OF PROVISIONS:** If any provision of this Ordinance or the application thereof to any person or circumstances shall be determined to be invalid, the remainder of the Ordinance and the application of its provisions to other persons not similarly situated or to the other circumstances shall not be affected thereby.

**REPEAL OF PREVIOUS ORDINANCES:** Any and all ordinances in conflict herewith shall be repealed.

NOW THEREFORE, BE IT ORDAINED BY THE BOARD OF TRUSTEES OF THE TOWN **OF LAGRANGE**, INDIANA this Ordinance will be in full force and effect from and after its passage and signature by the Town Board of the Town of LaGrange, Indiana, and as provided by law, and upon any further requirements under Indiana law.

DULY ORDERED BY THE TOWN BOARD OF THE TOWN **OF LAGRANGE** this 4th day of February, 2013.

BOARD OF TRUSTEES OF THE TOWN OF  
LAGRANGE

Mark W. English, President  
Bruce Rayless  
Ray J. Miller  
J. C. Ang  
Raymond E. Hoover

ATTEST:

La Miller  
Clerk-Treasurer

## **B. GENERAL EMPLOYMENT CLASSIFICATIONS**

All personnel of the Town of LaGrange shall be designated and classified as full-time, part-time, or seasonal.

1. Full-time employee: Any municipal employee working thirty-two (32) hours or more per week and for a period of more than 12 weeks consecutively may be considered a full-time employee of the Town and receive all benefits listed hereafter for full-time employees when approved or designated by the Town Council.

2. Part-time employee: Any municipal employee working less than thirty-two (32) hours per week for more than sixteen (16) weeks consecutively will be considered a part-time employee of the Town and will receive only those benefits hereinafter specified for part-time employees.

3. Seasonal employee: Any municipal employee working less than sixteen (16) weeks continuously, in a position not deemed to be a permanent or year-round position will be considered as a temporary employee of the Town, and will receive only those benefits hereinafter specified for seasonal employees.

## **II. EQUAL EMPLOYMENT OPPORTUNITY/SEXUAL HARASSMENT POLICY**

### **A. Equal Employment Policy**

1. This Equal Employment Opportunity Policy reaffirms the policy and commitment of the Town to provide equal employment opportunities for all employees and job applicants. The Town endorses and will follow its EEO Policy in implementing all employment practices, policies, and procedures.
2. The Town will recruit, hire, train and promote persons in all job titles without regard to race, color, religion, national origin, sex, age (except where sex or age is a bona-fide occupational qualification, as defined by law), or physical or mental disability (except where the disability prevents the individual from being able to perform the essential functions of the job and cannot be reasonably accommodated in full compliance with the law). The Town will make employment decisions as to further the principle of equal employment opportunity. The Town will ensure that all personnel decisions and actions, including but not limited to compensation, benefits, transfers, promotions, layoffs, returns from layoff, terminations, Town-sponsored training, education, tuition



assistance, and social and recreation programs will be administered without regard to race, color, religion, sex, age, national origin, or disability.

3. All employees are expected to comply with our Equal Employment Opportunity Policy. Managers and supervisors who are responsible for meeting Town objectives are expected to cooperate fully in meeting our equal employment opportunity objectives, and their overall performance will be evaluated accordingly.

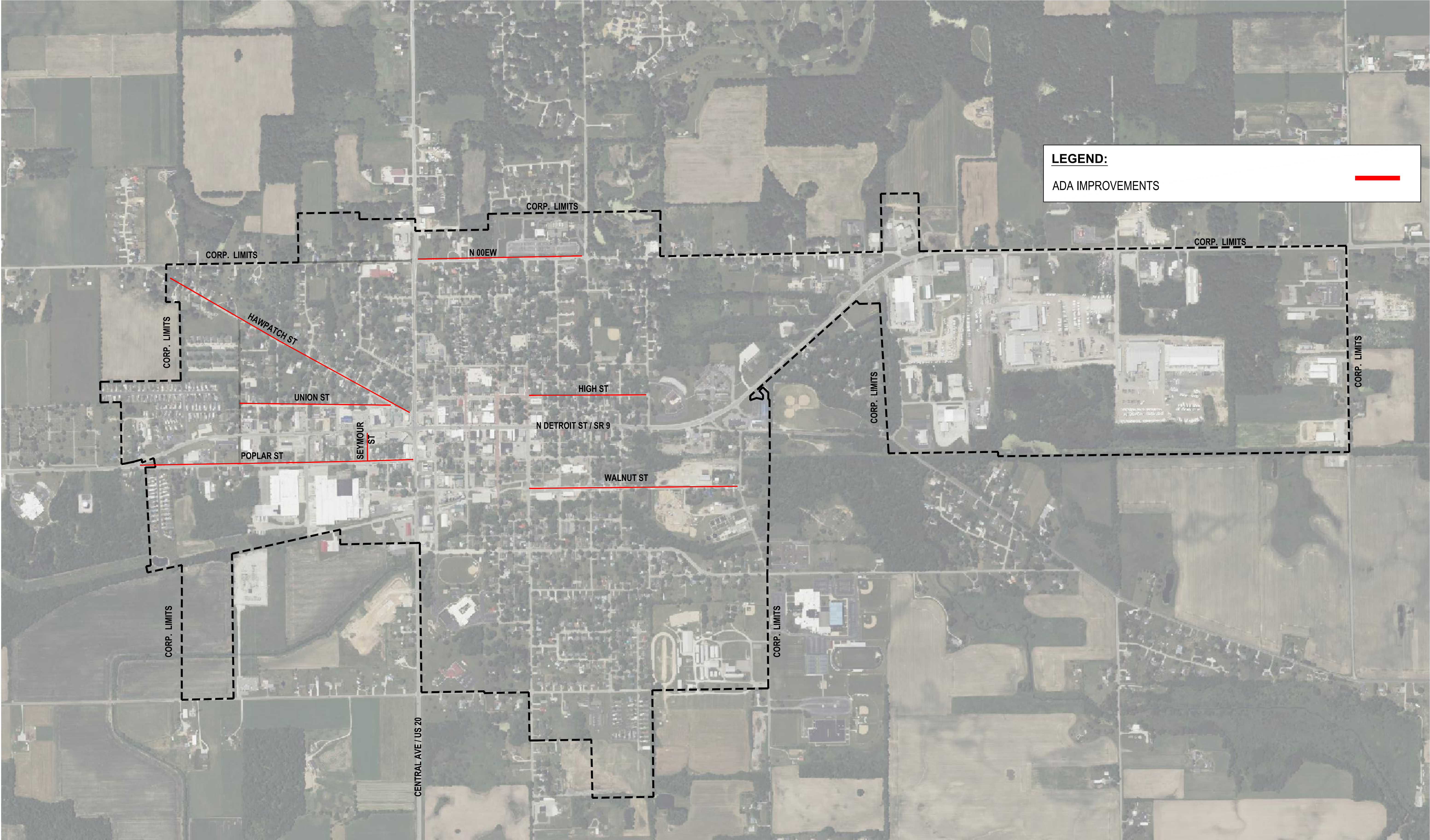
## **B. Sexual Harassment Policy**

1. In providing a productive work environment, the Town believes that its employees should be able to enjoy a workplace free from all forms of discrimination, including harassment on the basis of race, color, religion, gender, national origin, age, and disability. It is the Town's policy to provide an environment free from such harassment.
2. It is against the policy of the Town for any employee, whether a manager, supervisor, or co-worker, to harass another employee. Prohibited harassment occurs when verbal or physical conduct defaming or showing hostility toward an individual because of his or her race, color, religion, gender, national origin, age, or disability, or that of the individual's relatives, friends or associates, creates or is intended to create an intimidating, hostile, or offensive working environment; interferes or is intended to interfere with an individual's work performance; or otherwise adversely affects an individual's employment opportunities.
3. Harassing conduct includes, but is not limited to:
  - a. Epithets, slurs, negative stereotyping; or threatening, intimidating or hostile acts; which relate to race, color, religion, gender, national origin, age, or disability.
  - b. Written or graphic material that defames or shows hostility or aversion toward an individual or group because of race, color, religion, gender, national origin, age or disability and that is placed on walls, bulletin boards, or elsewhere on the Town's premises, or that is circulated in the workplace.
4. Any employee who believes he or she has been harassed in

## **Appendix F**

### **Curb Ramp & Sidewalk Updates**





# TOWN OF LAGRANGE ADA TRANSITION PLAN OVERVIEW



OVERVIEW

EXHIBIT