



PUBLIC RIGHT-OF-WAY ADA TRANSITION PLAN



City of Joliet

Last Updated September 2023

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I. ADA TRANSITION PLAN NEED AND PURPOSE

Need and Purpose

The [Americans with Disabilities Act \(ADA\)](#) is a civil rights law prohibiting discrimination against individuals on the basis of disability. It was enacted on July 26, 1990, and was amended in 2008 with the ADA Amendments Act. The ADA consists of five titles outlining protections in the following areas:

- I. Employment
- II. State and local government services
- III. Public accommodations
- IV. Telecommunications
- V. Miscellaneous Provisions

Title II of ADA pertains to the programs, activities and services public entities provide. As a provider of public transportation services and programs, the City of Joliet must comply with this section of the Act as it specifically applies to public service agencies. Title II of ADA provides that, "...no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such entity." [42 USC. Sec. 12132; 28 CFR. Sec. 35.130]

As required by Title II of ADA [28 CFR. Part 35 Sec. 35.105 and Sec. 35.150], the City of Joliet has conducted a self-evaluation of its facilities within public rights of way and has developed this Public Right-of-Way ADA Transition Plan detailing how the organization will ensure that all of those facilities are accessible to all individuals.

ADA and its Relationship to Other Laws

Title II of ADA is companion legislation to two previous federal statutes and regulations: the Architectural Barriers Acts of 1968 and Section 504 of the Rehabilitation Act of 1973. The Architectural Barriers Act of 1968 is a Federal law that requires facilities designed, built, altered or leased with Federal funds to be accessible. The Architectural Barriers Act marks one of the first efforts to ensure access to the built environment.

Section 504 of the Rehabilitation Act of 1973 is a Federal law that protects qualified individuals from discrimination based on their disability. The nondiscrimination requirements of the law apply to employers and organizations that receive financial assistance from any Federal department or agency. Title II of ADA extended this coverage to all state and local government entities, regardless of whether they receive federal funding or not.

Agency Requirements

Under Title II, the City of Joliet must meet these general requirements:

- Must operate their programs so that, when viewed in their entirety, the programs are accessible to and useable by individuals with disabilities [28 C.F.R. Sec. 35.150].
- May not refuse to allow a person with a disability to participate in a service, program or activity simply because the person has a disability [28 C.F.R. Sec. 35.130(a)].

- Must make reasonable modifications in policies, practices and procedures that deny equal access to individuals with disabilities unless a fundamental alteration in the program would result [28 C.F.R. Sec. 35.130(b) (7)].
- May not provide services or benefits to individuals with disabilities through programs that are separate or different unless the separate or different measures are necessary to ensure that benefits and services are equally effective [28 C.F.R. Sec. 35.130(b)(iv) & (d)].
- Must take appropriate steps to ensure that communications with applicants, participants and members of the public with disabilities are as effective as communications with others [29 C.F.R. Sec. 35.160(a)].
- Must designate at least one responsible employee to coordinate ADA compliance within the public rights of way [28 CFR Sec. 35.107(a)]. This person is often referred to as the "ADA Coordinator." The public entity must provide the ADA coordinator's name, office address, and telephone number to all interested individuals [28 CFR Sec. 35.107(a)].
- Must provide notice of ADA requirements. All public entities, regardless of size, must provide information about the rights and protections of Title II to applicants, participants, beneficiaries, employees, and other interested persons [28 CFR Sec. 35.106]. The notice must include the identification of the employee serving as the ADA coordinator and must provide this information on an ongoing basis [28 CFR Sec. 104.8(a)].
- Must establish a grievance procedure. Public entities must adopt and publish grievance procedures providing for prompt and equitable resolution of complaints [28 CFR Sec. 35.107(b)].
- This requirement provides for a timely resolution of all problems or conflicts related to ADA compliance before they escalate to litigation and/or the federal complaint process.

This document has been created to specifically cover accessibility within the public rights of way and does not include information on City programs, practices, or building facilities not related to public rights of way.

This document was created June 2023, and will follow the most current procedures and guidelines per Title II, the Proposed Guidelines for Pedestrian Facilities in Public Right of Way (PROWAG), the Illinois Accessibility Code (IAC), Illinois Department of Transportation Bureau of Design and Environment Manual (BDE), and Illinois Department of Transportation Bureau of Local Roads and Streets Manual (BLRS) as a best practice for accessibility within the public right-of-way.

II. DESIGNATION OF RESPONSIBILITY

In accordance with *28 CFR 35.107(a)*, the City of Joliet has designated the City of Joliet Deputy Director of Public Works, Engineering Division to serve as the ADA Title II Coordinator, to oversee the City's policies and procedures and handle grievances within the public rights of way. The ADA Coordinator will work to plan and coordinate ADA compliance efforts. The benefits of having an ADA Coordinator are the following:

- It makes it easier for members of the public to identify someone to help them with questions and concerns about disability discrimination.
- It provides a single source of information so questions from City staff and from outside the City can be answered quickly and consistently.
- It provides an individual who can focus on and who can be instrumental in moving compliance plans forward.

The contact information of the current City of Joliet Deputy Director of Public Works, Engineering Division is:

Sean Mikos, P.E.

Deputy Director of Public Works, Engineering Division

150 W. Jefferson Street

Joliet, IL 60432815-724-4200

publicworks@joliet.gov

Contact information is provided in Appendix A.

Training is an important tool for ensuring compliance with ADA requirements. The ADA Coordinator will identify resources and opportunities for agency employees at various levels to receive ADA-related training appropriate to their job functions, such as the Public Right of Way Accessibility Guidelines (PROWAG) training provided as part of the Self-Evaluation described in the Self-Evaluation Chapter of this document.

III. DESIGN STANDARDS AND GUIDELINES

The Department of Justice's revised regulations for Titles II and III of the Americans with Disabilities Act of 1990 (ADA) were published in the Federal Register on September 15, 2010. These regulations adopted revised, enforceable accessibility standards called the 2010 ADA Standards for Accessible Design, "2010 Standards." On March 15, 2012, compliance with the 2010 Standards was required for new construction and alterations under Titles II and III.

The City will also follow the Proposed Guidelines for Pedestrian Facilities in Public Right of Way (PROWAG), the Illinois Accessibility Code (IAC), Illinois Department of Transportation Bureau of Design and Environment Manual (BDE), and Illinois Department of Transportation Bureau of Local Roads and Streets Manual (BLRS) as a best practice for accessibility within the public right-of-way.

The Federal Highway Administration and the Illinois Department of Transportation also have public right-of way accessibility design specifications and details. The "Standard Specifications for Road and Bridge Construction in Illinois", current edition, applicable IDOT standard construction details, applicable City of Joliet standards/details and the current ADA and PROWAG guidelines will apply to and govern all compliance evaluations of existing facilities and proposed improvements for accessibility compliance.

In most cases, the City will be following the IDOT design standards as those are developed, monitored and routinely revised based on the ADA guidelines. As the federal guidance and other standards are updated, the City adopts these latest regulations as the minimum standards for use on the public ways.

There may be limitations which make it technically infeasible for a public improvement to achieve full accessibility within the scope of any project. As these locations are encountered and improved to the extent feasible within the project scope, reasons for the inability to achieve full compliance must be thoroughly documented. As future projects or opportunities arise, those public improvements shall continue to be incorporated into future work. Regardless of whether full compliance can be achieved or not, each public improvement shall be made as compliant as possible in accordance with the judgment of City staff. Additional agencies will review based on location jurisdiction and funding.



Figure 1 Example of intersection corner with curb ramp.

Intersection Corners

Curb ramps or blended transitions will be constructed or upgraded to achieve compliance within all capital improvement projects to the maximum extent practicable. There may be limitations which make it technically infeasible for an intersection corner to achieve full accessibility within the scope of any project. Those limitations will be noted and those intersection corners will remain on the transition plan. As future projects or opportunities arise, those intersection corners shall continue to be incorporated into future work. Regardless of whether full compliance can be achieved or not, each intersection corner shall be made compliant to the maximum extent practicable in accordance with the judgment of City staff, IDOT, FHWA, and documented on IDOT Bureau of Design BDE 3101 form. Additional agencies will review based on location jurisdiction and funding. (View Appendix H, Exhibit H-2)

Sidewalks / Shared Use Path

Sidewalks and shared use paths will be constructed or upgraded to achieve compliance within all capital improvement projects to the maximum extent practicable. There may be limitations which make it technically infeasible for segments of sidewalks or trails to achieve full accessibility within the scope of any project. Those limitations will be noted and those segments will remain on the transition plan. As future projects or opportunities arise, those segments shall continue to be incorporated into future work. Regardless of whether full compliance can be achieved or not, every sidewalk or trail shall be made compliant to the maximum extent practicable in accordance with the judgment of City staff. Additional agencies will review based on location jurisdiction and funding.



Figure 2 Example of sidewalk path at a complex intersection.



Figure 3 Traffic control signal at Canton Farm Rd. 2017.

Traffic Control Signals

Traffic control signals will be constructed or upgraded to achieve compliance within all capital improvement projects to the maximum extent practicable. There may be limitations which make it technically infeasible for individual traffic control signal locations to achieve full accessibility within the scope of any project. Those limitations will be noted and those locations will remain on the transition plan. As future projects or opportunities arise, those locations shall continue to be incorporated into future work. Regardless of whether full compliance can be achieved or not, each traffic signal control location shall be made compliant to the maximum extent practicable in accordance with the judgment of City staff. Additional agencies will review based on location jurisdiction and funding. Illinois Department of Transportation, Will County DOT, and Kendall County Highway Department will maintain and be responsible for the traffic control signals over which they have jurisdiction throughout the city. (View Appendix H, Exhibits H-2, H-14)

Other policies, practices and programs not identified in this document will follow the applicable ADA standards.

References (links are denoted in Appendix B):

- U.S. Department of Justice – 2010 ADA Standards for Accessible Design
- Illinois Department of Transportation – Bureau of Design and Environmental Manual Chapter 58 – Special Design Elements
- IDOT Bureau of Local Roads and Streets Manual Chapter 41, Section 6 - Requirements for Accessible Public Rights of Way
- Illinois Department of Transportation – Highway Standards
- Public Rights of Way Accessibility Guidelines (PROWAG)
- State of Illinois Capital Development Board (1997 April 24). Illinois Accessibility Code. (Updated Illinois Accessibility Code under review)
- United States Access Board – Policies & Highway Standards
- Federal Highway Administration – Policies & Highway Standards

Other policies, practices and programs not identified in this document will follow the applicable ADA standards.

IV. SELF-EVALUATION

Overview

Under Title II of the ADA (28 CFR Sec. 35.105), public entities are required to perform a self-evaluation of their current services, policies and practices with regard to accessibility. The intent of the ADA self-evaluation is to review the City's public rights-of-way, in order to identify any obstacles or barriers to accessibility that need to be addressed. To complete this self-evaluation, the City examined sidewalks and curb ramps within the public right-of-way.

Public entities are required to provide an opportunity for interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the self-evaluation process by submitting comments [28 CFR Sec. 35.105(b)]. For more information on the City's Public Outreach efforts, please see Section V and Appendix D.

Process and Findings

Between May 2022 and April 2023, the City of Joliet completed a self-evaluation of its public rights-of-way with regard to accessibility.

An important component of the self-evaluation process is the identification of obstacles or barriers to accessibility, and the corresponding modifications that will be needed to remedy these items. The following sections provide a summary of improvements that have already been made, and obstacles that the City plans to address as part of this Transition Plan.

Public Rights-of-Way

As part of the self-evaluation process, the City has conducted an inventory and evaluation of pedestrian facilities within its public rights-of-way, which consist of the following:

- Approximately 766 miles of sidewalks
- Approximately 9,611 curb ramps

A detailed evaluation of these facilities with regard to accessibility compliance is provided in Appendix C, and will be updated as conditions in the City evolve.

Public Rights-of-Way (PROWAG) Training

As part of the Self-Evaluation Survey, several Joliet employees participated in Public Right of Way Accessibility Guidelines (PROWAG) hands-on training. Employees learned about curb ramp ADA standards and participated in evaluation of curb ramps in downtown Joliet. While the standards are integrated into their daily work, it is valuable to provide a refresher on the latest guidance.

Previous Practices

Since the adoption of the ADA, the City of Joliet has provided accessible pedestrian features as part of the City's capital improvement projects. Joliet also administers a Sidewalk Replacement Program which repairs and updates sidewalks to meet current ADA Standards within the public rights of way.



Figure 4: City of Joliet employees at a PROWAG training. March 2023.

The City of Joliet provides several avenues for residents to submit non-emergency neighborhood and community issues to the City, including any barriers to accessibility in the public rights-of-way. These requests can be made:

- Via CitizenVUE App
- Via the City's website www.joliet.gov/our-city/i-want-to/report-3101
- By contacting City Hall Information Desk by phone at 815-724-4005
- In person at City Hall, 150 W. Jefferson St. Joliet, IL 60432

Methodology

The City of Joliet will utilize two methods for upgrading pedestrian facilities to current ADA standards. The first and most comprehensive method is through scheduled street and utility improvement projects. All public rights-of-way impacted by these projects will be upgraded to current ADA accessibility standards to the maximum extent practicable within the public rights-of-way. The second method is through specific sidewalk and ADA accessibility improvement projects that are identified individually. These projects will be incorporated into the Capital Improvement Program (CIP) on a case-by-case basis as determined by City staff. (View Appendix H, Exhibit H-8 for a map of the Capital Improvement Program, 2017-2021)

Policy

The City of Joliet's goal is to continue to provide accessible pedestrian design features as part of its capital improvement projects. The City will also continue to administer the Sidewalk Replacement Program, which repairs or replaces sidewalk on an annual basis, based on community request. Under the Sidewalk Replacement Program, the City covering 100% of repair costs. Requests can be made through the four methods outlined below. The City has adopted ADA design standards and procedures as listed in the Design Standards and Guidelines Chapter. These standards and procedures will be kept up-to-date with nationwide and local best management practices.

The City will continue to consider and respond to all accessibility improvement requests. All accessibility improvements will be reviewed for feasibility and scheduled consistent with transportation priorities. The City will coordinate with external agencies to ensure that all new or altered pedestrian access routes within the City jurisdiction are ADA compliant to the maximum extent feasible. (View Appendix H-2 to H-7 for a map of Road Jurisdiction)

Maintenance of pedestrian facilities within the public rights-of-way will continue to follow the policies set forth by the City. Examples of typical maintenance items relating to accessibility include: sidewalk repair policy, renewal of crosswalk markings, and signal hardware. See Appendix C for more details about the Self-Evaluation Survey results.

The City will continue to provide various methods through which residents can submit requests to improve accessibility in the public rights-of-way, including:

- Via CitizenVUE App
- Via the City's website www.joliet.gov/our-city/i-want-to/report-3101
- By contacting City Hall Information Desk by phone at 815-724-4005
- In person at City Hall, 150 W. Jefferson St. Joliet, IL 60432

Additionally, requests can be submitted to the City's ADA Title II Coordinator. Contact information is provided in Appendix A.

Priority Areas

Priority of work locations will be guided using the following criteria. Work will be scheduled for completion within the scope of the Capital Project Improvement Program. The Department of Public Works will manage the prioritization and program development efforts.

The following factors will be considered in the establishment of priorities:

- Citizen request / complaint
- Proximity to public locations such as train stations, schools, and government centers
- Locations with high pedestrian volumes
- Severity of barrier – focus on curb barriers, signals, & detectable warnings
- Opportunity for coordination with other repair work
- Construction feasibility and required permitting

External Agency Coordination

The City will coordinate with the Illinois Department of Transportation, the Will County Division of Transportation, and the Kendall County Highway Department to assist with identifying and facilitating elimination of accessibility barriers along their pedestrian access routes when appropriate. Facilities along private streets within the City are the responsibility of the property owners and / or associations. (View Appendix H, Exhibit H-1 for map of Counties)

The City will coordinate with these external agencies and property owners to assist in the facilitation of the elimination of accessibility barriers along their routes to the extent possible.

City of Joliet Internal Departmental Coordination

The ADA Title II Coordinator at the City of Joliet Department of Public Works, Engineering Division will coordinate with other city departments to assist with identifying and facilitating elimination of accessibility barriers in the public right-of-way along routes to other City services to the extent possible.

Improvement Schedule

The City of Joliet will strive toward continuous progress in improving the accessibility of pedestrian facilities in the public right-of-way as part of capital improvement projects and other projects within the public rights-of-way. The City will also continue to consider and respond to accessibility requests within a reasonable timeframe and as budget allows.

The City will utilize several methods for upgrading pedestrian facilities to the current accessibility standards.

The first method is through City of Joliet-led capital improvements. This includes:

- Scheduled street improvement projects. All pedestrian facilities impacted by these projects will be upgraded to current accessibility standards to the extent possible as part of the project.
- Annual Sidewalk and Curb Program. This program is budgeted annually and is aimed at repairing hazardous sidewalk and curb locations within the public right-of-way. The locations for the program are generated primarily through resident requests.
- Implementation of stand-alone sidewalk and right-of-way accessibility improvement projects. These projects, when determined to be necessary and feasible by City staff, will be incorporated into the Capital Improvement Program (CIP) on a case by case basis, as City finances allow.
- Reasonable accommodation requests. The City of Joliet will provide relief to the extent feasible where a person with a disability has identified an issue and / or requested assistance.

The second method is through incorporation as part of private development. The City has adopted stringent plan submittal requirements for the design of curb ramps to be constructed within the public right-of-way as part of private development projects. Further, all sidewalks and curb ramps constructed within the public right-of-way are inspected by the City engineering staff to confirm full compliance with ADA / PROWAG requirements prior to the City accepting the improvements.

The final method is through coordination with other agencies performing work within the City. This includes, but is not limited to, the Illinois Department of Transportation, the Will County Division of Transportation, and Kendall County Highway Department.

Schedule

The City will make efforts to select areas with high priority and solvability where feasible. One method of prioritization will be based upon the location of the barrier. Government and public facilities will be prioritized where feasible.

A second method of prioritization will be guided by the self-evaluation results where feasible. In general, there is not a clear area of the city that requires immediate prioritization. The self-evaluation survey reveals that the upgrades to curb ramps are needed throughout the city.

However, below are four small areas that have a higher concentration of intersections without curb ramps or with curb ramps but no detectable warnings (View Appendix H, Exhibit H-32). The areas below may change in the future as the City continues to improve accessibility.

- Area bounded by Caton Farm Rd, Black Rd, Ridge Rd, and Roth Rd.
- Area bounded by Theodore St, Black Rd, Frontage Rd, and Essington Rd.
- Area bounded by Old Mill Rd, Frontage Rd, Caton Farm Rd, and Mallard Ln.
- Area bounded by Bluff St, Parks Ace, Ruby St, and Second Ave

The ADA Title II Coordinator will establish an on-going monitoring process to document progress in updating the City's public rights-of-way to meet ADA standards.

Monitoring Progress

This document will continue to be updated as improvements are made and conditions within the City evolve. The appendices in this document will be updated periodically, while the main body of the document will be updated at least every 5 years, with a future update schedule to be developed at that time. With each main body update, public comments will be solicited to continue the public outreach efforts.

V. PUBLIC OUTREACH

Under the Americans with Disabilities Act, each agency is required to publish its responsibilities with regard to ADA compliance and provide the public an opportunity to provide input on the Transition Plan prior to adoption. The City of Joliet recognizes that public participation is an important component in the development of this document. A copy of the *Public Right-of-Way Accessibility Transition Plan* is available on the City website's [Public Works Engineering Division page](#) and by request to the ADA Coordinator. Any resident may address their concerns or comments to the ADA Coordinator listed in this document.

Prior to adoption, the public was provided an opportunity to provide input on the Transition plan. The draft plan was posted on the City's website and additional copies for viewing were available at City Hall, 150 W Jefferson Street, Joliet, IL 60432. A 30-day period of public comment and input on the draft of the ADA Transition Plan was provided.

The City shared the document and details about this public comment period with the community, specifically, ADA groups and the Committee on Citizens with Disabilities via the City's website, newsletter and social media.

Appendix D provides a summary of comments received during the public comment period.

VI. PUBLIC NOTICE OF ADA REQUIREMENTS AND GRIEVANCE PROCEDURE

Under the Americans with Disabilities Act, each agency is required to publish its responsibilities with regard to ADA compliance. A draft of this public notice is provided in Appendix E.

If users of the City of Joliet's and services believe the City has not provided a reasonable accommodation, they have the right to file a grievance. In accordance with *28 CFR Sec. 35.107(b)*, the City has developed a grievance procedure for the purpose of the prompt and equitable resolution of citizens' complaints or concerns. This grievance procedure is outlined in Appendix E. Individuals will have the option to submit a public right-of-way accessibility complaint form. A copy of this complaint form can be found in Appendix F.

VII. PROGRESS MONITORING AND TRANSITION PLAN MANAGEMENT

This Transition Plan is considered to be a living document that will continue to be updated as conditions within the City evolve. The initial schedule is to formally review the complete document (main body and appendices) at least once every 5 years, to identify any need for updates. Updates to the appendices or attachments may be made more frequently as needed. Any substantial updates to the main body of this document will include a public comment period to continue the City's public outreach efforts.

The Transition Plan Implementation Coordinator will establish an on-going monitoring process to document progress in updating the City's public rights-of-way to meet ADA standards. City employees will also be encouraged to report any accessibility concerns or deficiencies that are identified.

VIII. CONCLUSION

The City of Joliet has demonstrated a commitment to provide equal access to its facilities within the public right-of-way and to maintain and enhance compliance with the requirements of the Americans with Disabilities Act. The completed *Public Right-of-Way Accessibility Transition Plan* provides the City with the framework to address current accessibility compliance issues and plan for future components that will need to be addressed. The City is committed to the findings and improvements identified in this Transition Plan and will continue to adhere to accessibility requirements to benefit the overall accessibility of the City to all residents.

IX. FORMAL ADOPTION OF ADOPTION OF ADA TRANSITION PLAN

This ADA Transition Plan is hereby adopted by the City of Joliet, effective October of 2023.

Signed:



ADA Title II Coordinator and Implementation Coord.

10/4/2023
Date



Authorizing Official

10/11/23
Date

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APPENDIX A | CONTACT INFORMATION

ADA Title II Coordinator and Transition Plan Implementation Coordinator

Sean Mikos, P.E.

Deputy Director of Public Works, Engineering Division

150 W. Jefferson Street

Joliet, IL 60432

815-724-4200

publicworks@joliet.gov

APPENDIX B | ADA RESOURCE REFERENCES

ADA Resource References:

- U.S. Department of Justice - 2010 ADA Standards for Accessible Design
http://www.ada.gov/2010ADASTandards_index.htm
- Illinois Department of Transportation – Bureau of Design and Environmental Manual Chapter 58 – Special Design Elements
<https://idot.illinois.gov/Assets/uploads/files/Doing-Business/Manuals-Guides-&-Handbooks/Highways/Design-and-Environment/Design%20and%20Environment%20Manual,%20Bureau%20of.pdf>
- IDOT Policies - Bureau of Local Roads and Streets Chapter 41, Section 6 - Requirements for Accessible Public Rights of Way
<https://idot.illinois.gov/Assets/uploads/files/Doing-Business/Manuals-Guides-&-Handbooks/Highways/Local-Roads-and-Streets/Local%20Roads%20and%20Streets%20Manual.pdf>
- Public Rights of Way Accessibility Guidelines (PROWAG) is posted at
<https://www.access-board.gov/prowag/>
- Illinois Department of Transportation – Highway Standards <https://idot.illinois.gov/doing-business/procurements/engineering-architectural-professional-services/Consultants-Resources/index>
- State of Illinois Capital Development Board (1997 April 24). Illinois Accessibility Code. Online Capital Development Board website
<https://cdb.illinois.gov/content/dam/soi/en/web/cdb/business/codes/illinoisaccessibilitycode/documents/1997-illinois-accessibility-code.pdf>
- Illinois Attorney general's Office - www.illinoisattorneygeneral.gov
- United States Access Board - www.access-board.gov/
- Federal Highway Administration - www.fhwa.dot.gov

APPENDIX C | SELF-EVALUATION INVENTORY SUMMARY

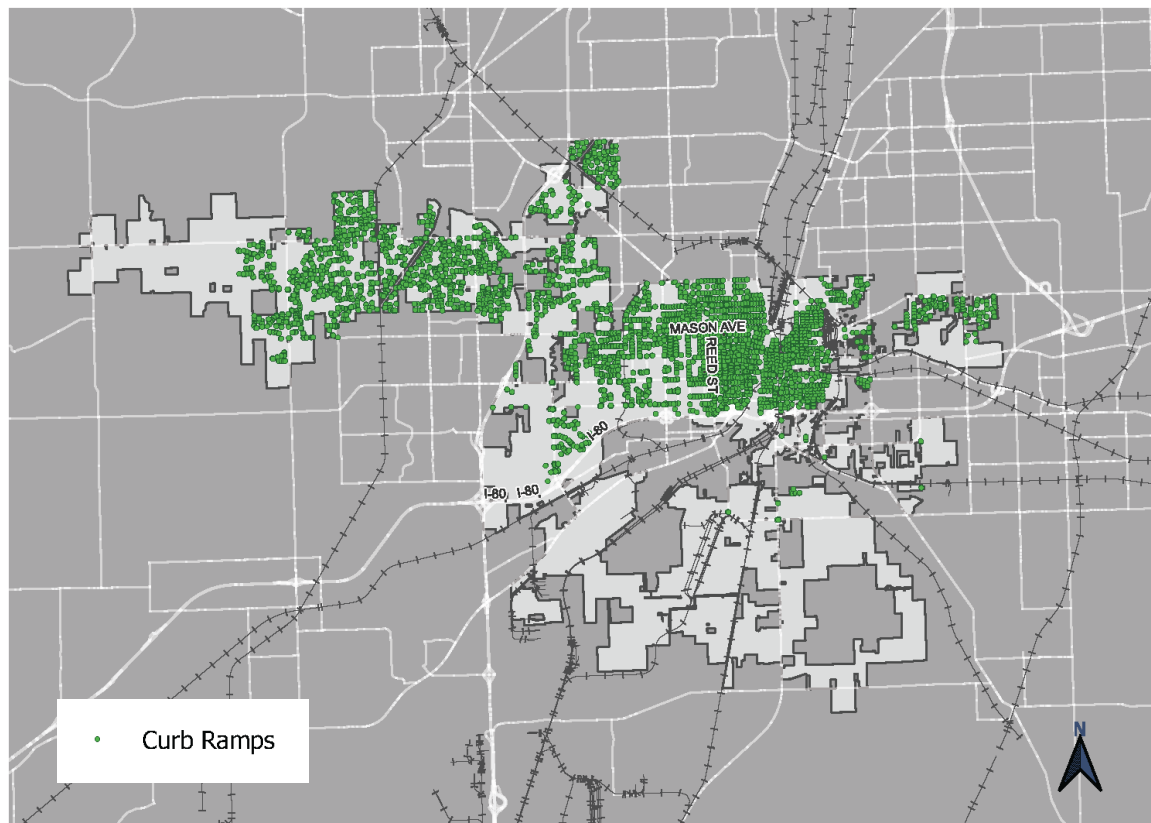
The City of Joliet completed a self-evaluation of the accessibility of its pedestrian facilities between May 2022 and April 2023. Through the self-evaluation process, the City of Joliet compiled an inventory of pedestrian facilities within its public rights-of-way, and subsequently examined 9,611 curb ramps at approximately 2,400 intersections in regards to accessibility. Additionally, sidewalks were evaluated for accessibility through a sidewalk gap analysis. The results are listed as follows. Please refer to Appendix H to view all maps.

Inventory & Findings

Curb Ramps

Approximately 2,400 intersections within the City of Joliet's jurisdiction were evaluated based on curb ramp accessibility.

Curb Ramps

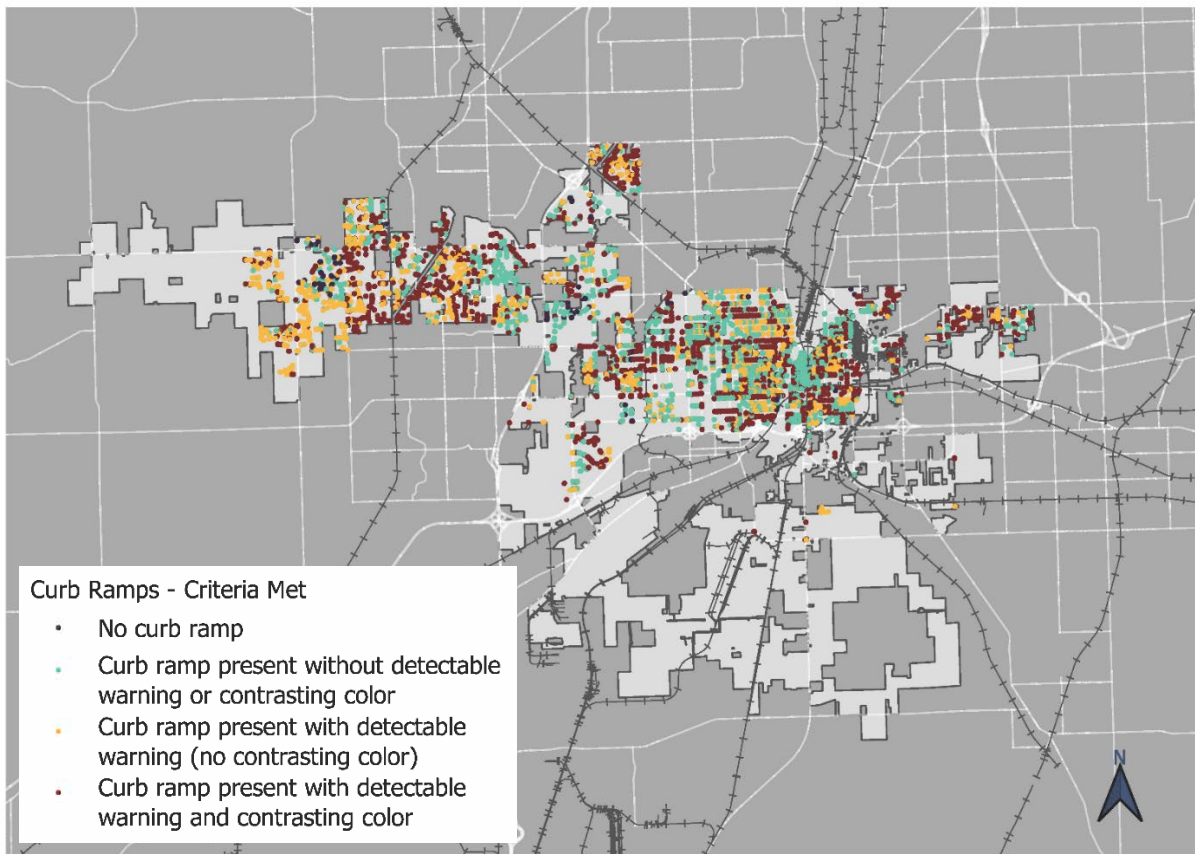


The survey does not include the southeastern portion or the western tip of the city as these areas do not have sidewalks or curb ramps.

Curb ramps were preliminarily evaluated along three criteria: whether there is any curb ramp is present, whether there is a detectable warning feature, and whether the detectable warnings have contrasting color. An accessible curb ramp meets all three of these criteria, amongst other criteria.

- 90% of potential curb ramp locations have curb ramps
- 72% of curb ramps have detectable warnings
- 52% of curb ramps have detectable warnings with contrasting color

Curb Ramps - Preliminary Evaluation Criteria



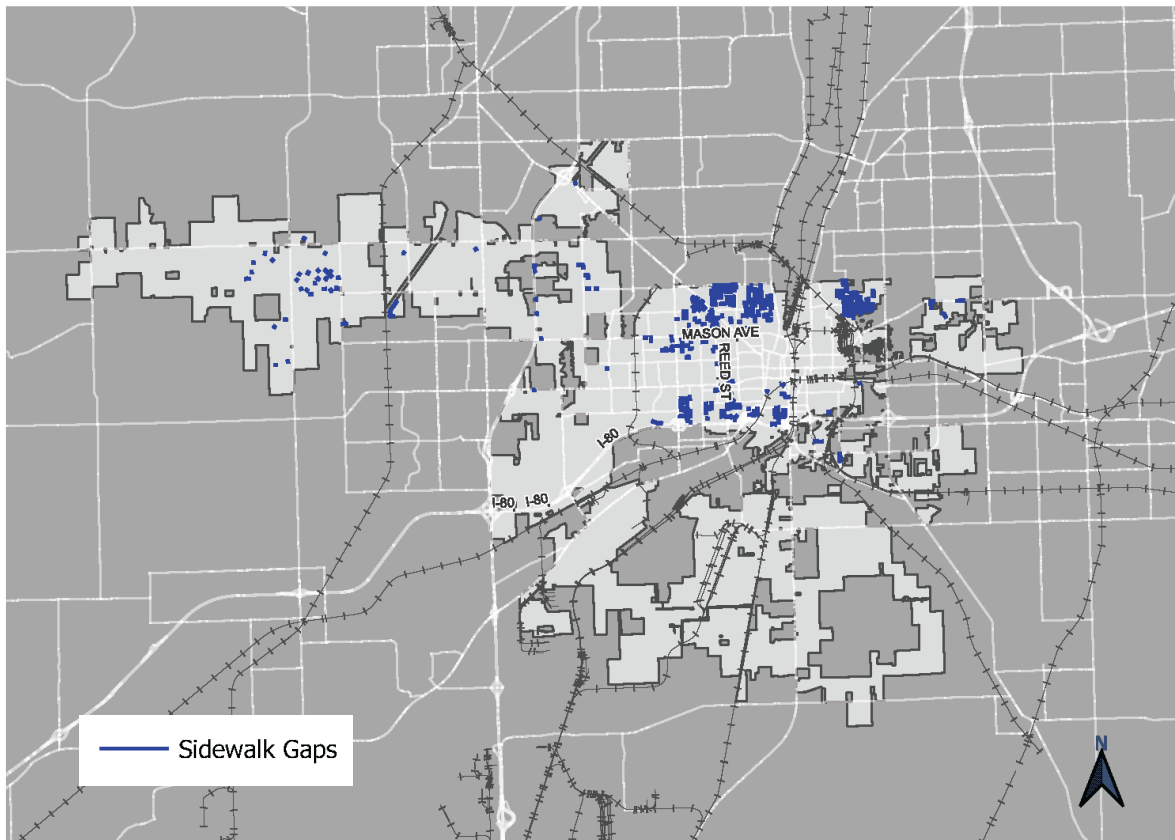
In general, there is not a clear area of the city that requires immediate prioritization. The self-evaluation survey reveals that the upgrades to curb ramps are needed throughout the city. However, below are four small areas that have a higher concentration of intersections without curb ramps or with curb ramps but no detectable warnings (View Appendix H, Exhibit H-32)

- Area bounded by Caton Farm Rd, Black Rd, Ridge Rd, and Roth Rd.
- Area bounded by Theodore St, Black Rd, Frontage Rd, and Essington Rd.
- Area bounded by Old Mill Rd, Frontage Rd, Caton Farm Rd, and Mallard Ln.
- Area bounded by Bluff St, Parks Ace, Ruby St, and Second Ave

Sidewalk Gaps

The City of Joliet maintains approximately 766 miles of sidewalks. Sidewalk gaps were identified concurrent to the curb evaluation. A total of 17.5 miles of sidewalk gaps were identified, which is about 2% of total sidewalk mileage in the city. A gap is defined as a location where a portion of a block has sidewalk, but the sidewalk ends before reaching the end of the block.

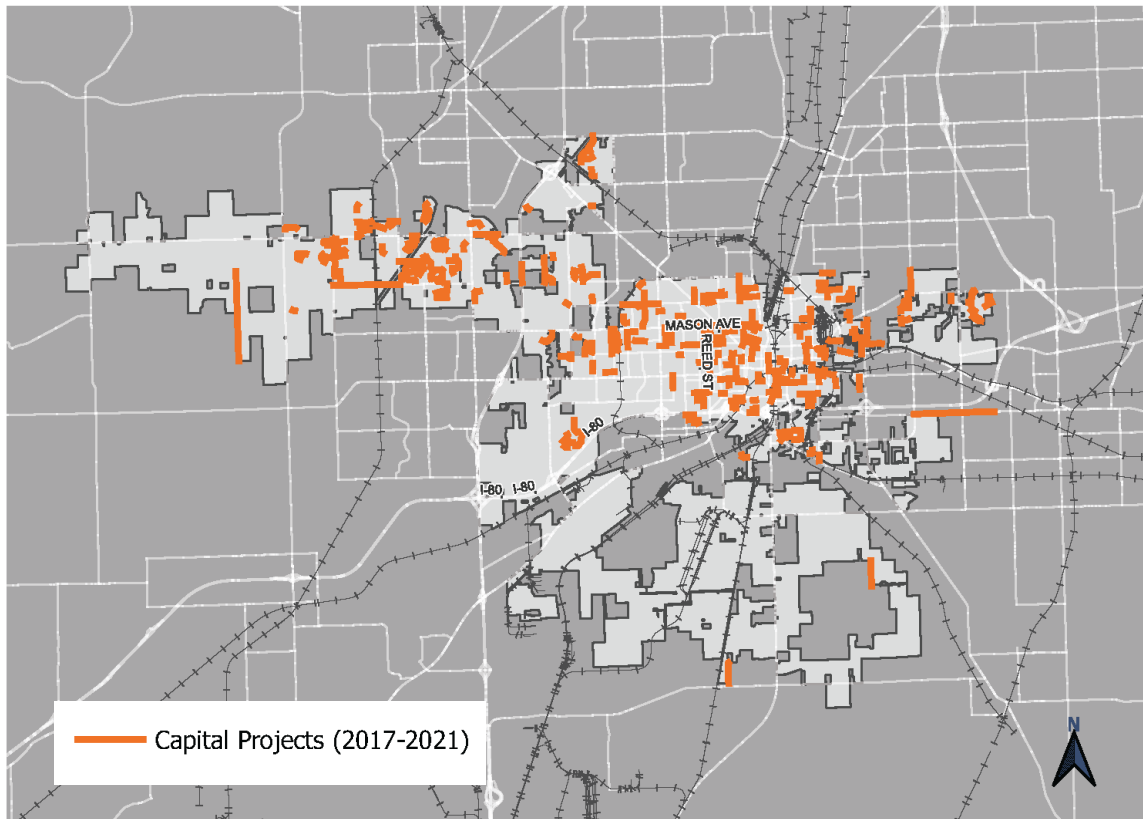
Sidewalk Gaps



Sidewalk gaps were more likely found at the outskirts of the City, likely due to the fact that these areas may be dedicated to industrial activity and are more rural in nature. However, these conclusions are preliminary as the City of Joliet does not have exhaustive data on sidewalk condition. As resources allow, the City will continue operating the sidewalk program while emphasizing known locations that are ADA deficient.

The City of Joliet is committed to addressing both curb ramp accessibility, sidewalk gaps, and upgrading traffic control signals throughout the City. Based on the Capital Improvements Program (2017-2021) alone, the City improves at least approximately 10 miles of roadway per year, although this number can vary from year to year. Through these projects, the City is able to evaluate at least approximately 362 curb ramps and make any necessary improvements to ensure that these curb ramps are ADA compliant. The City will continue to evaluate accessibility of current city pedestrian right-of-way as part of the capital improvements projects.

Capital Projects (2017-2021)



Improvement Schedule

The City of Joliet will strive toward continuous progress in improving the accessibility of pedestrian facilities in the public right-of-way as part of City of Joliet-led capital improvement projects and other projects within the public rights-of-way. The City will also continue to consider and respond to accessibility requests within a reasonable timeframe and as budget allows.

The ADA Title II Coordinator will establish an on-going monitoring process to document progress in updating the City's public rights-of-way to meet ADA standards.

Maintenance Activities and Additional Items

Maintenance of pedestrian facilities within the public rights-of-way will continue to follow the policies set forth by the City. The Departments of Public Works maintains over 510 miles of city roadways and over 750 miles of sidewalks and is also responsible for coordinating projects and maintenance of County, State, and Federal roadways in and around Joliet, with other governmental agencies. As part of their responsibilities, the Department of Public Works:

- Designs / constructs roadway and drainage improvement projects for the Roadway Reconstruction Program & Deteriorated Road Resurfacing Program
- Designs / constructs roadway and drainage improvement projects for the Capital Improvement Program (CIP)
- Investigates sidewalk complaints and administers the sidewalk program
- Reviews plans for new development including subdivisions and site plans

- Performs inspection on construction projects including both City and developer driven projects
- Maintains and installs roadway pavement markings
- Performs street sweeping
- Performs street maintenance including pothole repair and crack filling
- Plows / salts streets
- Removes debris from streets after storm damage and removes garbage from the public rights-of-way
- Mows grass on certain public roadways
- Grades aggregate alleys and roadways
- Performs parkway tree trimming or removal

APPENDIX D | PUBLIC OUTREACH

Prior to adoption, the public was provided an opportunity to provide input on the *Public Right-of-Way Accessibility Transition Plan*. The public comment period was a 60-day period.

The Draft Plan was made available to the Mayor's Committee on Disabilities and to the public on June 30, 2023. The Draft Plan was available on the City's website on June 30, 2023 and was advertised through a press release and the City's social media accounts.

Public comments were received from June 30, 2023 to August 30, 2023 are included below.

Date	Public Comment
08/29/2023	From the Mayor's Committee of Disability (full comment in the next page): "The Transition plan should have short term and long term goals. 1. Identification and location of physical barriers; what problems are being encountered? 2. Method used to make the facilities accessible. 3. Schedule for removing the obstructions and/or modifications along with budget to accomplish. Every year a portion of the budget should include ADA goals. 4. The inclusion of unsafe crossings such as the Senior Services Center where parking is across the street from the building and heavy, traffic without traffic lights, makes crossing dangerous. There are several places in town that could benefit from pedestrian Crossing signs that say "stop for pedestrians" 5. Coordination with State Transition Plan Title II Coordinator for joint efforts. 6. Have a series of meetings (at least 2) for public input at different sections of town. The committee feels a 20-year plan can work if the goal is to achieve a 100% compliance with the ADA and not 80%. The Mayor's Committee feels that an ADA Coordinator should be designated in each city department with the proper training on the ADA."

ADA Transition Plan Suggestions

Mayor's Committee on Disabilities

Three area non-profits working with the disability community were given copies of the Joliet Transition plan. Feedback and comments:

The people of Joliet deserve a first rate ADA Transition Plan. Persons with a disability need to be free to develop their talents and pursue employment without barriers to achieving their goals. Access to programs and services is the basic goal of the Americans with Disabilities Act. Physical access is part of the ADA, the other part is the policy changes that must be made to ensure that persons with various disabilities can benefit from programs and services provided by city government.

The first step in the process is self-evaluation. This process pinpoints problems in accessibility and mobility impairments as well as policies and practices of the city. First on the city plan are the problems encountered in using city sidewalks and curb ramps. These are important because they allow persons with a disability to reach hospitals, community services, bus stops, trains, schools, and shopping. Inaccessible or inadequate infrastructure affects pregnant women, parents with young children, the elderly, who can trip easily, and in reality all pedestrians.

Self-Evaluation Checklist

Issue	Possible Barriers
Sidewalks and pathways clear width	Obstructions causing a narrow path
Sidewalk and pathway slope	steepness, irregularities, sinking, rising
Materials and finishes	Deterioration of surfaces, deterioration of Markings, appropriateness of material
Gratings	Grating type, grate opening orientation
Discontinuities	Missing sections, gaps, drops, steps

Obstructions	Signs, mail boxes, fire hydrants, street lights,
	Benches, traffic signal poles, traffic signal
	Control boxes, drainage structures, snow/ice
	Standing water
Traffic Signals	provision for visually impaired, auditory signals
	Inadequate timing for slow crossers, buttons
	Accessible for wheel chair users

The Transition plan should have short term and long term goals.

1. Identification and location of physical barriers; what problems are being encountered?
2. Method used to make the facilities accessible.
3. Schedule for removing the obstructions and/or modifications along with budget to accomplish. Every year a portion of the budget should include ADA goals.
4. The inclusion of unsafe crossings such as the Senior Services Center where parking is across the street from the building and heavy, traffic without traffic lights, makes crossing dangerous. There are several places in town that could benefit from pedestrian Crossing signs that say "stop for pedestrians"
5. Coordination with State Transition plan Title II Coordinator for joint efforts.
6. Have a series of meetings (at least 2) for public input at different sections of town.

The committee feels a 20 year plan can work if the goal is to achieve a 100% compliance with the ADA and not 80%.

The Mayor's Committee feels that an ADA Coordinator should be designated in each city department with the proper training on the ADA

For people who have never experienced a disability, it is difficult to see the needs. They have only a limited understanding of how the environment impacts a person's ability to participate in everyday activities. For this reason training in ADA requirements is essential for the success of a Transition Plan.

Anthony R. Arellano

Chair

City of Joliet Mayor's Committee on Disabilities

APPENDIX E | PUBLIC NOTICE OF ADA REQUIREMENTS AND GRIEVANCE PROCEDURE

As required by the Americans with Disabilities Act, the City of Joliet has posted the following notice outlining its responsibilities with regard to ADA compliance.

Public Notice

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990, the City of Joliet will not discriminate against qualified individuals on the basis of disability in the City's services, programs, or activities.

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

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

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

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

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

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

Grievance Procedure under the Americans with Disabilities Act

This Grievance Procedure is established to meet the requirements of the [Americans with Disabilities Act of 1990 \("ADA"\)](#). It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the City of Joliet.

The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of complainant and location, date, and description of the problem. The City of Joliet provides a public right-of-way accessibility complaint form for residents to fill out. This complaint form is available through the City's website and paper copies can be found at Joliet City Hall. A copy of the complaint can be found in Appendix F.

Additionally, individuals can submit a grievance through the City's [Citizen Engagement App & Online Service Request Portal](#).

Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint, will be made available for persons with disabilities upon request.

The complaint should be submitted by the grievant and / or his / her designee as soon as possible but no later than 60 calendar days after the alleged violation to:

Sean Mikos, P.E.

Deputy Director of Public Works, Engineering Division

150 W. Jefferson Street

Joliet, IL 60432

815-724-4200

publicworks@joliet.gov

Within 15 calendar days after receipt of the complaint, the ADA Coordinator or their designee will communicate with the complainant regarding possible resolutions. Within 15 calendar days of this communication, the ADA Coordinator or their designee will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of the City of Joliet and offer options for substantive resolution of the complaint.

If the response by the ADA Coordinator or their designee does not satisfactorily resolve the issue, the complainant and / or his / her designee may appeal the decision within 15 calendar days after receipt of the response to the Director of Public Works or their designee.

Within 15 calendar days after receipt of the appeal, the Director of Public Works or their designee will communicate with the complainant regarding possible resolutions. Within 15 calendar days after this communication, the Director of Public Works or their designee will respond in writing, and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint.

All written complaints received by the ADA Coordinator or their designee, appeals to the Director of Public Works or their designee, and responses from this office will be retained by the City of Joliet for at least three years.

**APPENDIX F | RIGHT-OF-WAY ACCESSIBILITY COMPLAINT
FORM****RIGHT-OF-WAY ACCESSIBILITY COMPLAINT
FORM****City of Joliet**

Department of Public Works

Attn: ADA Coordinator

150 W. Jefferson Street

Joliet, IL 60432

Email: publicworks@joliet.gov**Office Use Only:**

Date Received: _____

Date Issued: _____

PLEASE COMPLETE THE ENTIRE FORM AND PRINT LEGIBLY. Incomplete forms will be returned. To submit an accessibility concern or complaint to **City of Joliet**, please complete this form, and mail or email to the Department of Public Works.

If you need assistance with this form, please contact the City's ADA Coordinator directly at 815-724-4200 or via the CitizenVUE Online Website Portal: <https://www.joliet.gov/our-city/i-want-to/report-3101>.

CONTACT INFORMATION

Contact Name: _____

Mailing Address: _____

City: _____ State: _____ Zip Code: _____

Phone Number: _____ E-mail Address: _____

SPECIFIC COMPLAINT INFORMATION

Location of the Accessibility Issue *(Please include city, roadway name, intersection (if applicable), facility name and / or location if other than a roadway, i.e. rest area, pedestrian*

bridge, etc.):

Please describe in detail the nature of the complaint (include all parties that were involved):

Use additional page(s) if required and attach any documents you believe support your complaint.

ADDITIONAL INFORMATION

Has this complaint been filed with another private, federal, state, local agency, or legal entity?

Yes _____ No _____

If yes, please provide details below:

APPENDIX G | PUBLIC RIGHT-OF-WAY GREIVANCE TRACKING SHEET

For Internal Use

Complaint #:

Complainant Name:

City of Joliet - ADA Grievance Process Tracking Sheet

Step in the Grievance Process		Date	ADA Timing Guidance	
1	Grievance Event			
2	Initial Complaint Filed		within 60 days of event	Complaint Date
3	ADA Coordinator Meet with Complainant		within 15 days of complaint	Complaint date + 15 days
4	ADA Coordinator Respond with Proposed Resolution		within 15 days of meeting	Complaint date + 30 days
5	Complainant Appeal if Unsatisfied with Proposed Resolution		within 15 days of proposed resolution	Complaint date + 45 days
6	City Manager Meet with Complainant about Appeal		within 15 days of appeal	Complaint date + 60 days
7	City Manager Respond with Final Resolution		within 15 days of meeting	Complaint date + 75 days

NOTES

APPENDIX H | MAPS

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Exhibit H-1: Study Area

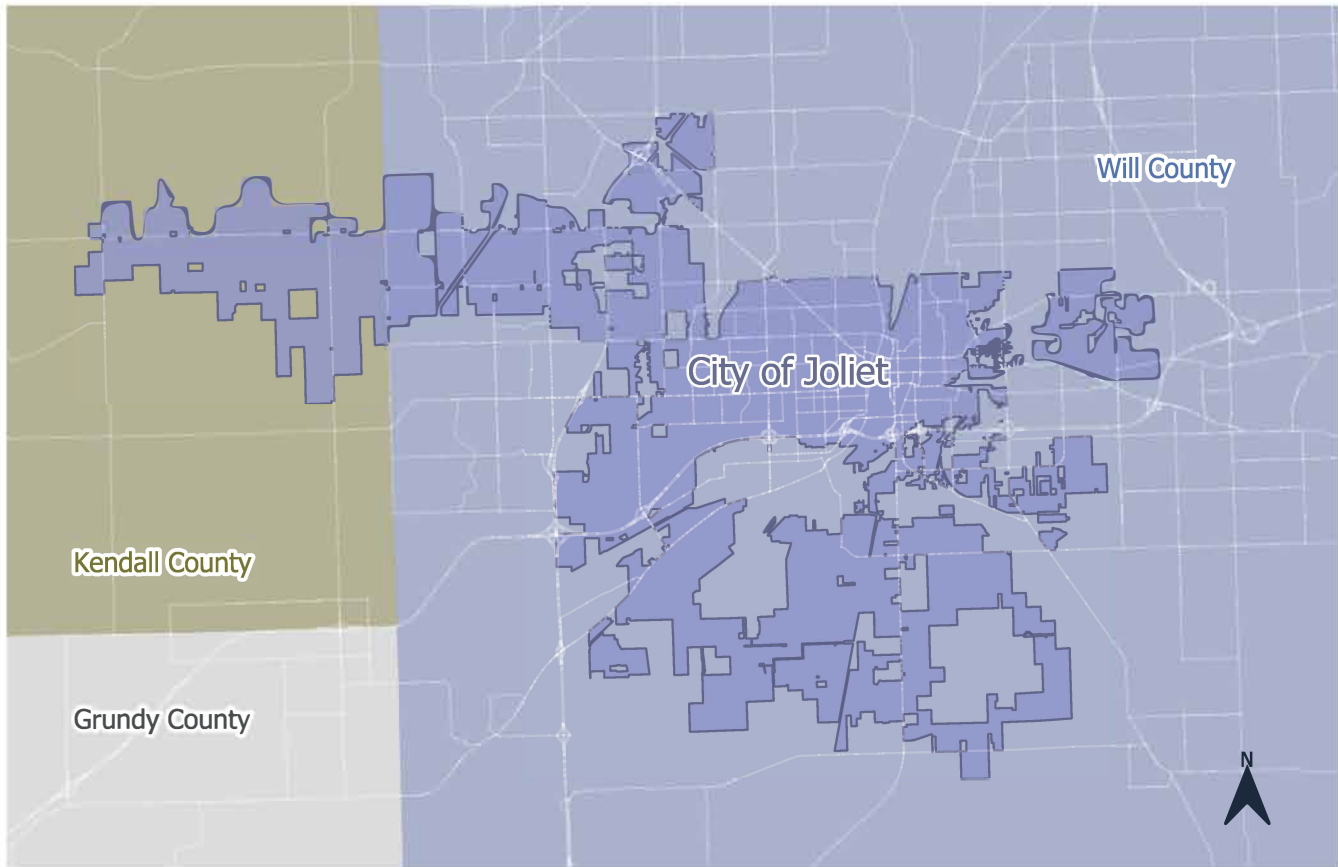
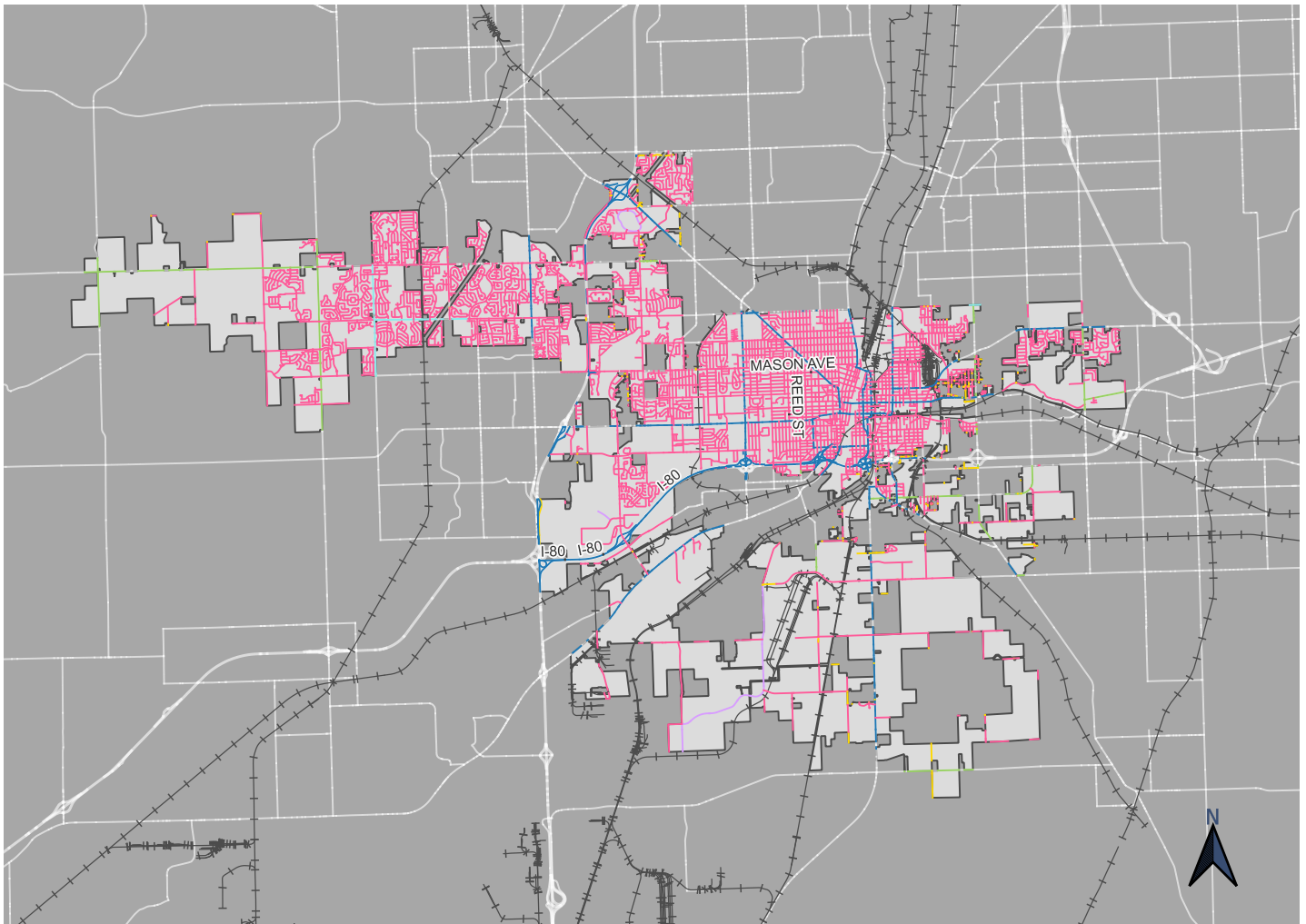


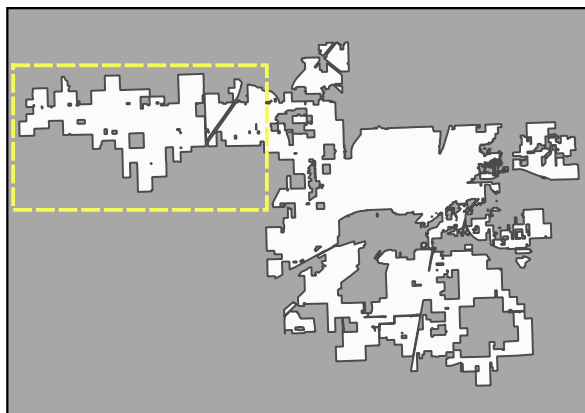
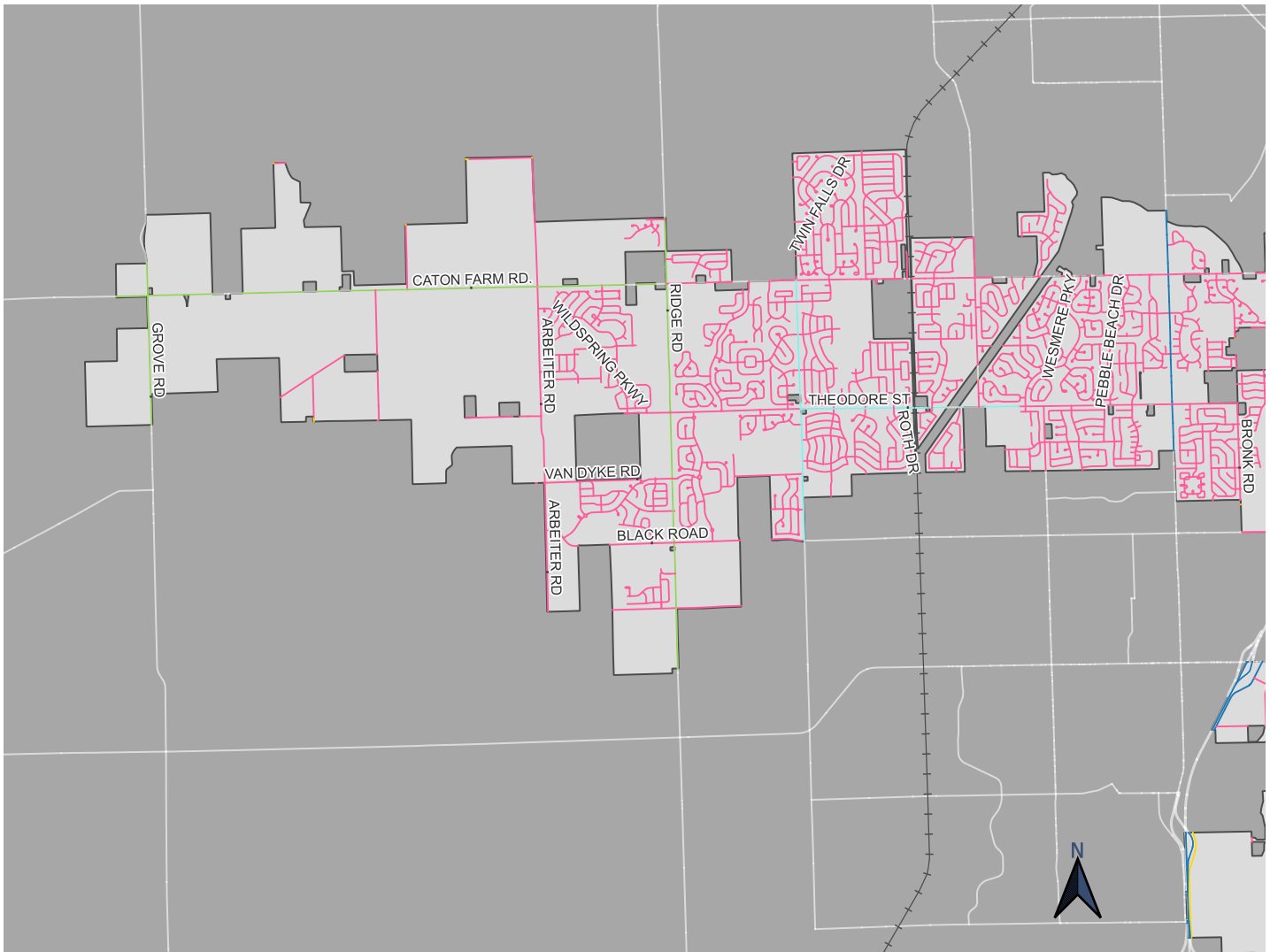
Exhibit H-2: Roadway Jurisdiction



Roadway Jurisdiction

- IDOT
- County
- Municipality
- Private (includes Tollway)
- Adjacent Township or Road District
- Township or Road District

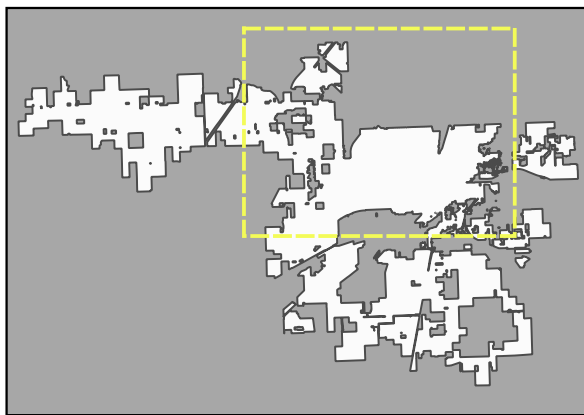
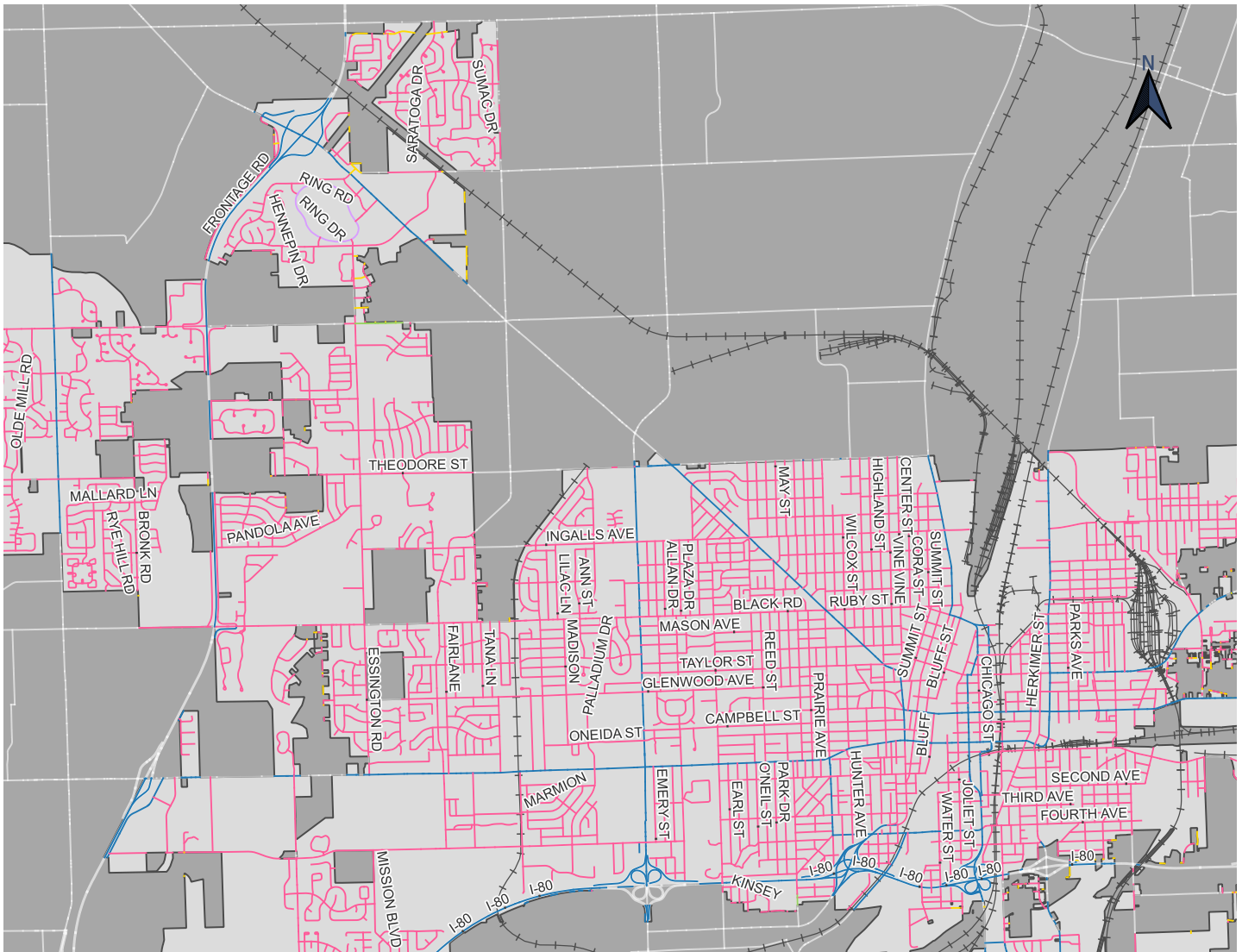
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Roadway Jurisdiction

- IDOT
- County
- Municipality
- Private (includes Tollway)
- Adjacent Township or Road District
- Township or Road District

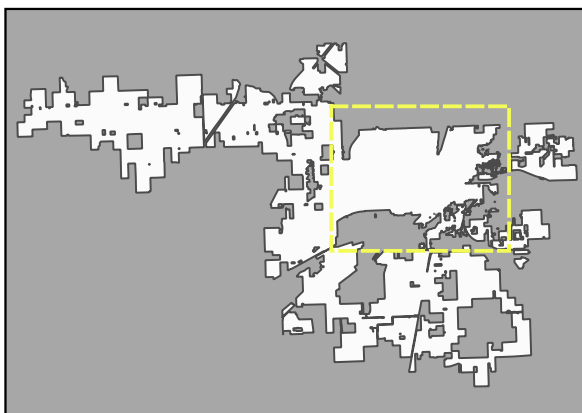
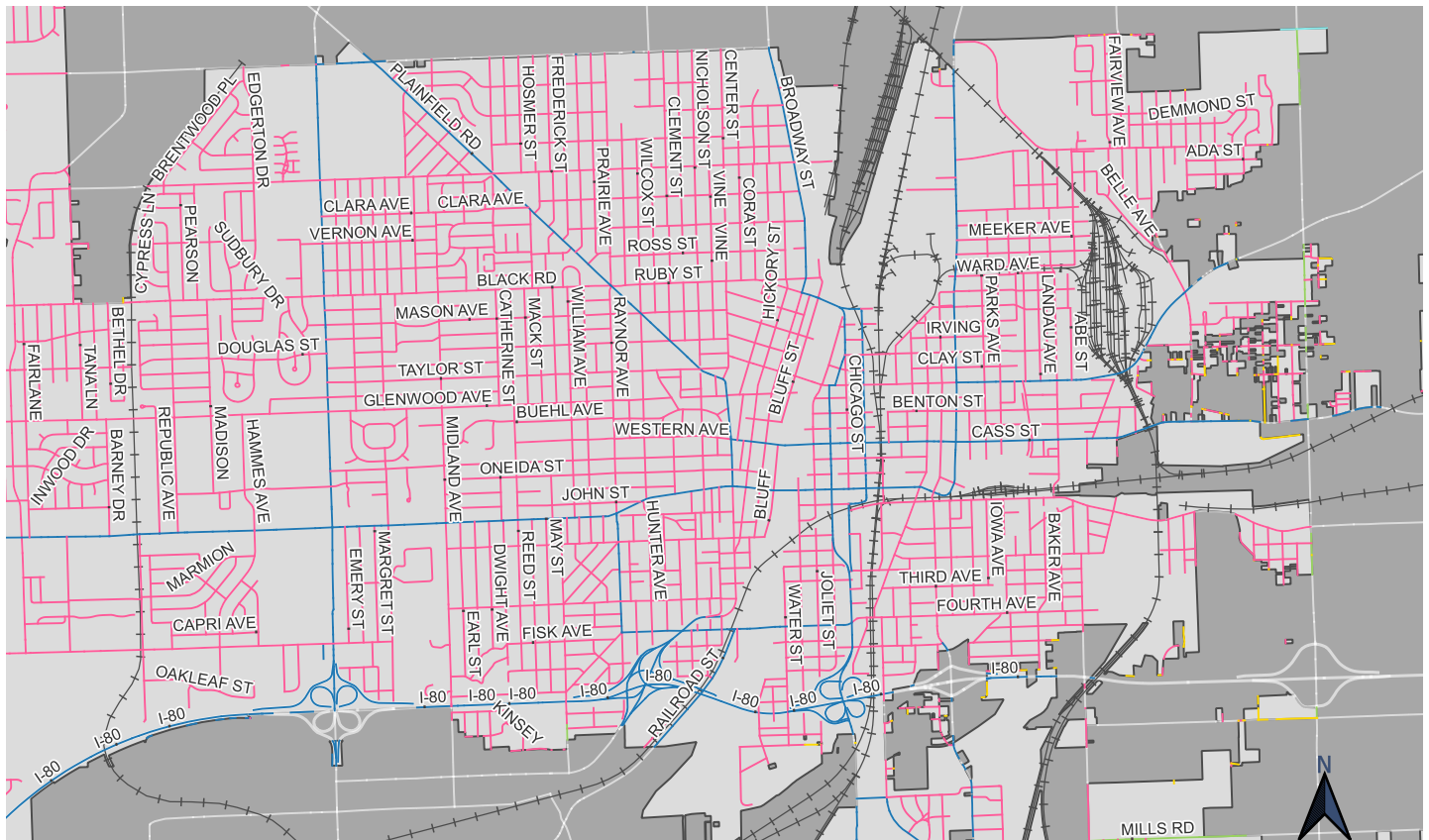
Exhibit H-4: Roadway Jurisdiction



Roadway Jurisdiction

- IDOT
- County
- Municipality
- Private (includes Tollway)
- Adjacent Township or Road District
- Township or Road District

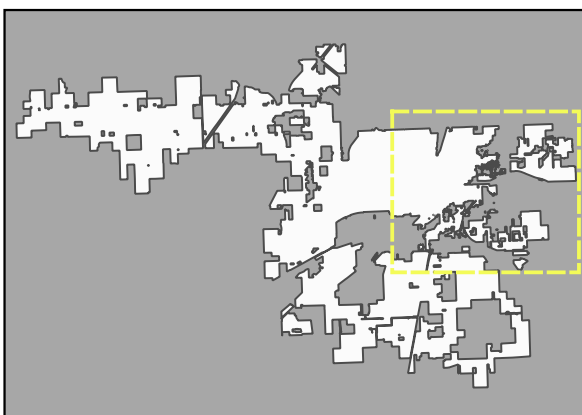
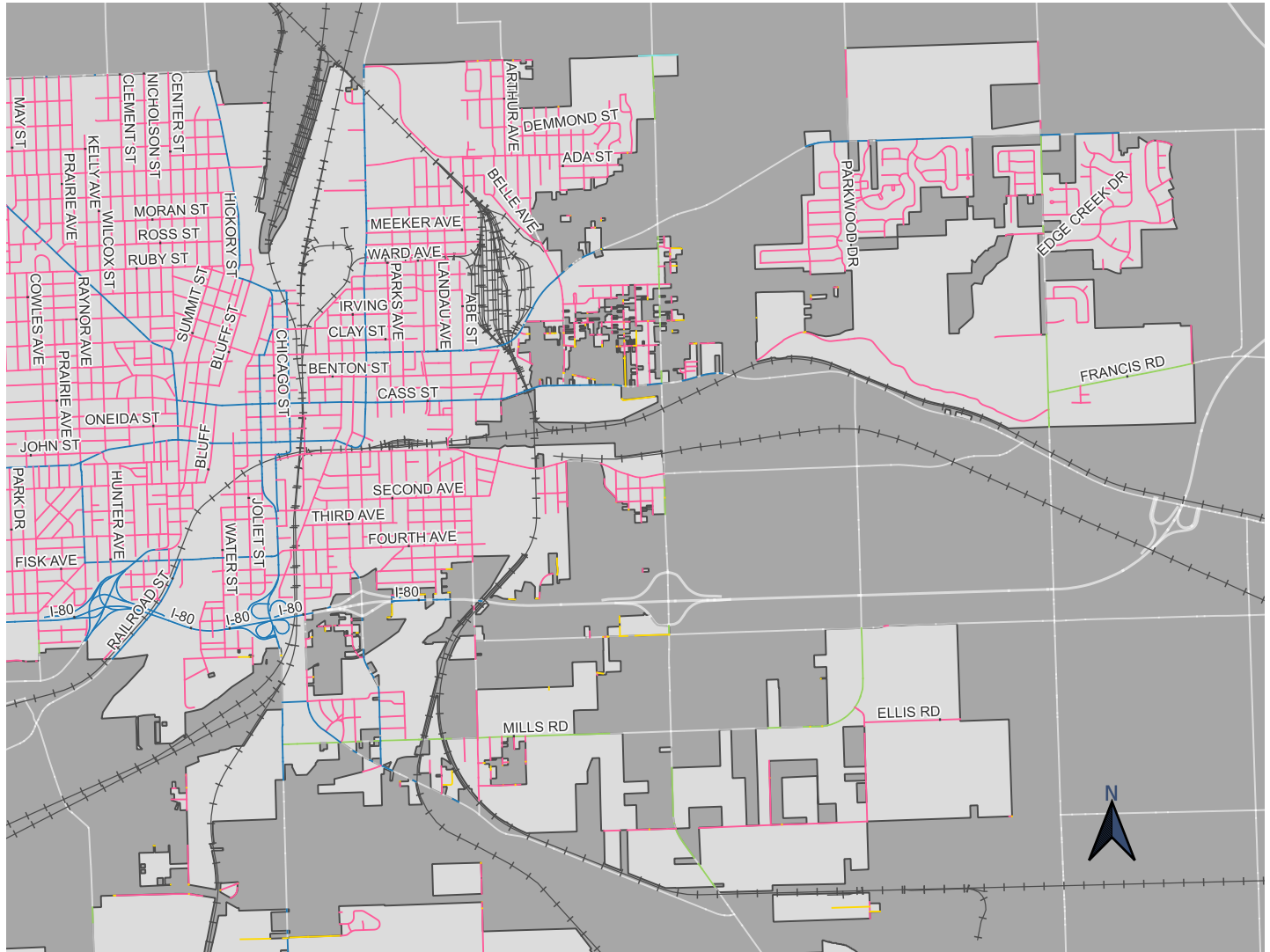
Exhibit H-5: Roadway Jurisdiction



Roadway Jurisdiction

- IDOT
- County
- Municipality
- Private (includes Tollway)
- Adjacent Township or Road District
- Township or Road District

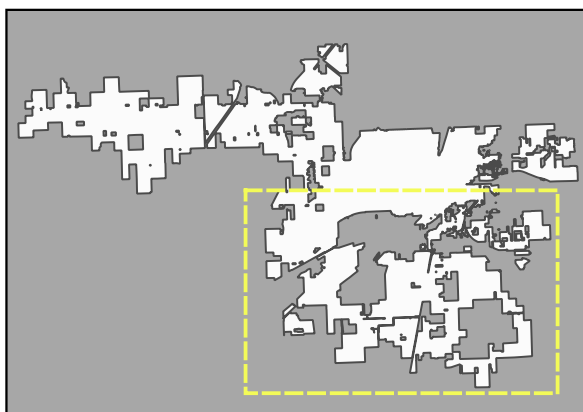
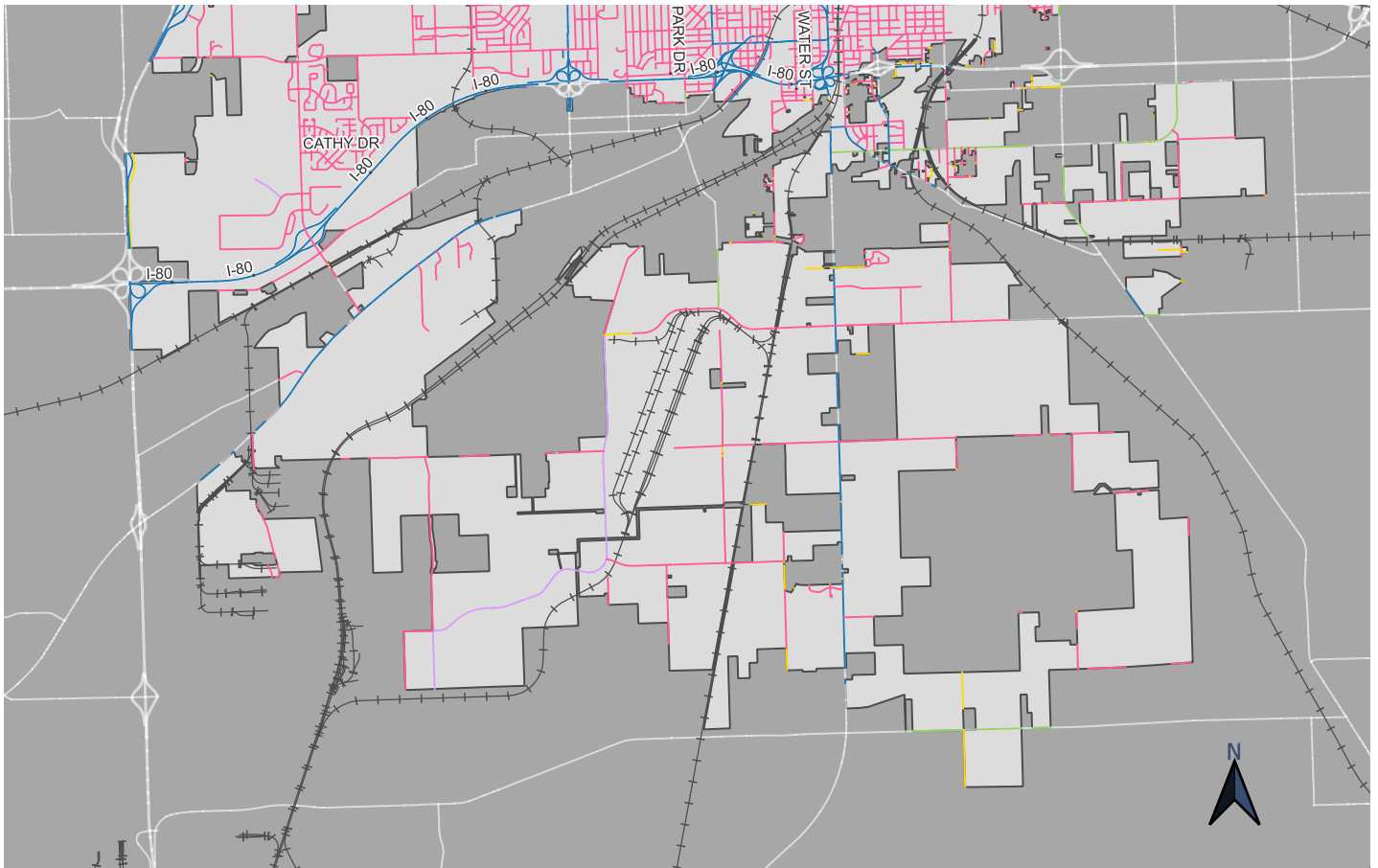
Exhibit H-6: Roadway Jurisdiction



Roadway Jurisdiction

- IDOT
- County
- Municipality
- Private (includes Tollway)
- Adjacent Township or Road District
- Township or Road District

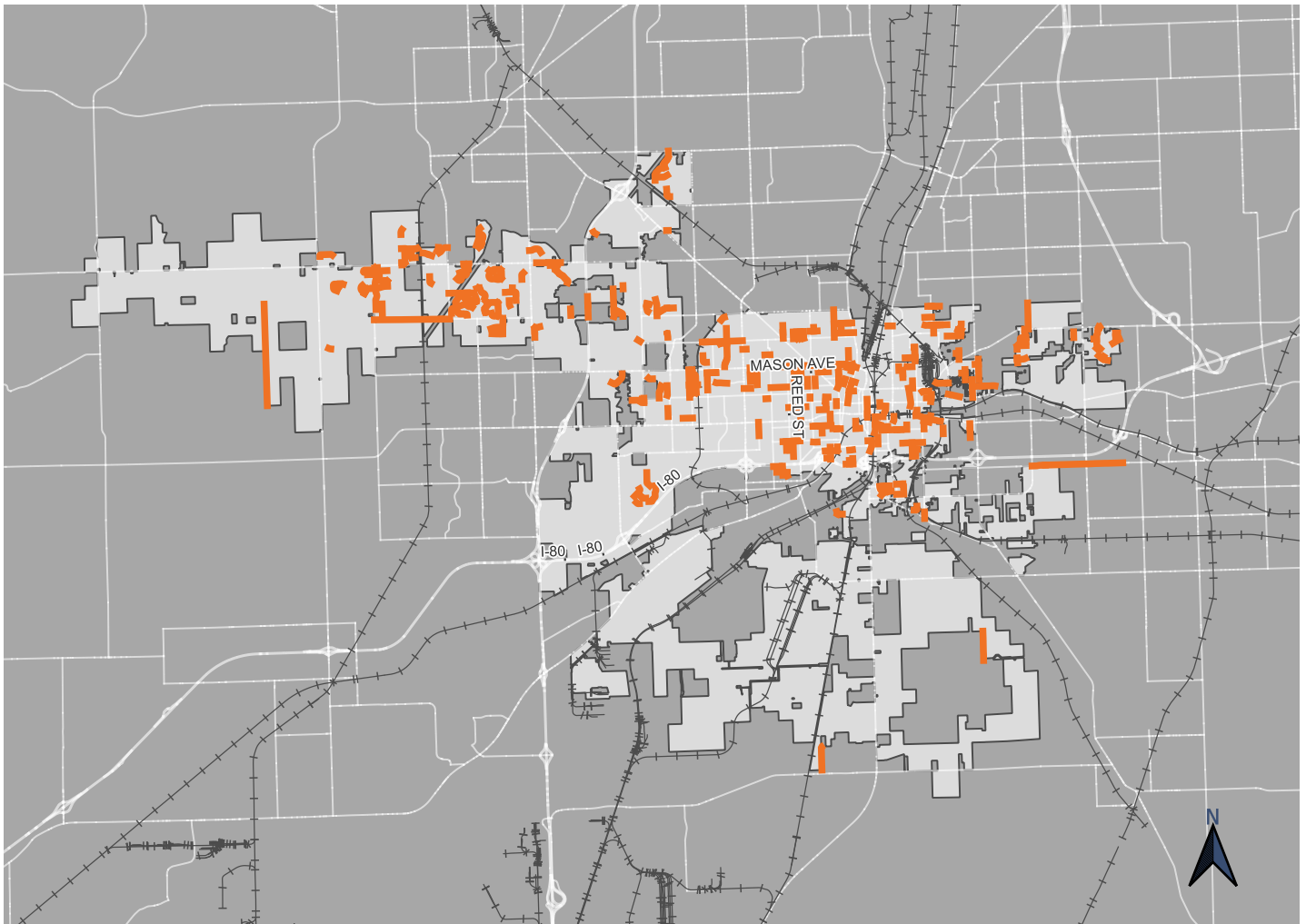
Exhibit H-7: Roadway Jurisdiction



Roadway Jurisdiction

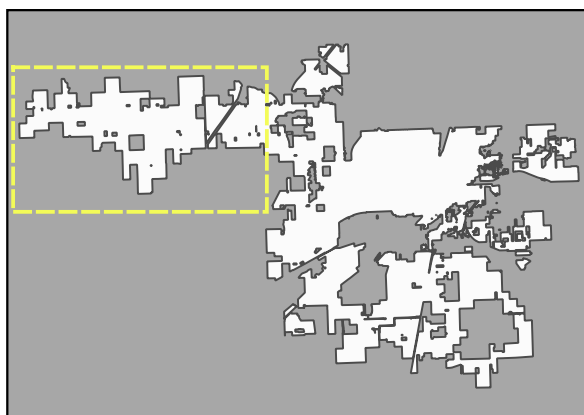
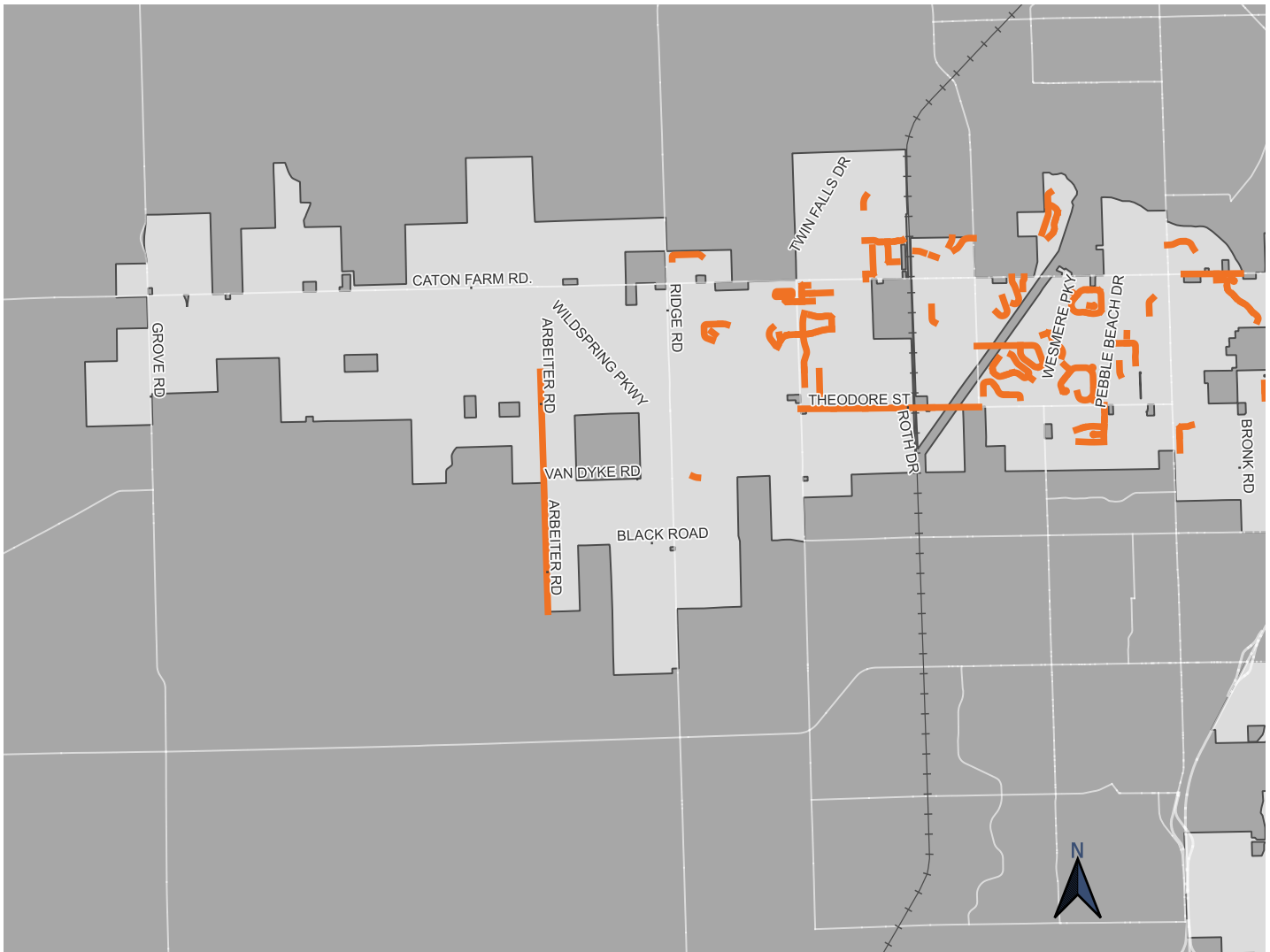
- IDOT
- County
- Municipality
- Private (includes Tollway)
- Adjacent Township or Road District
- Township or Road District

Exhibit H-8: Capital Projects (2017-2021)



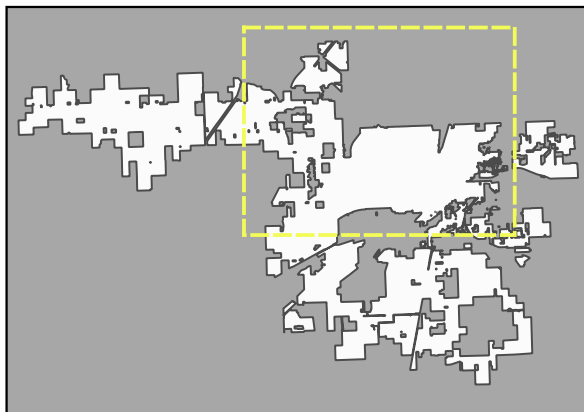
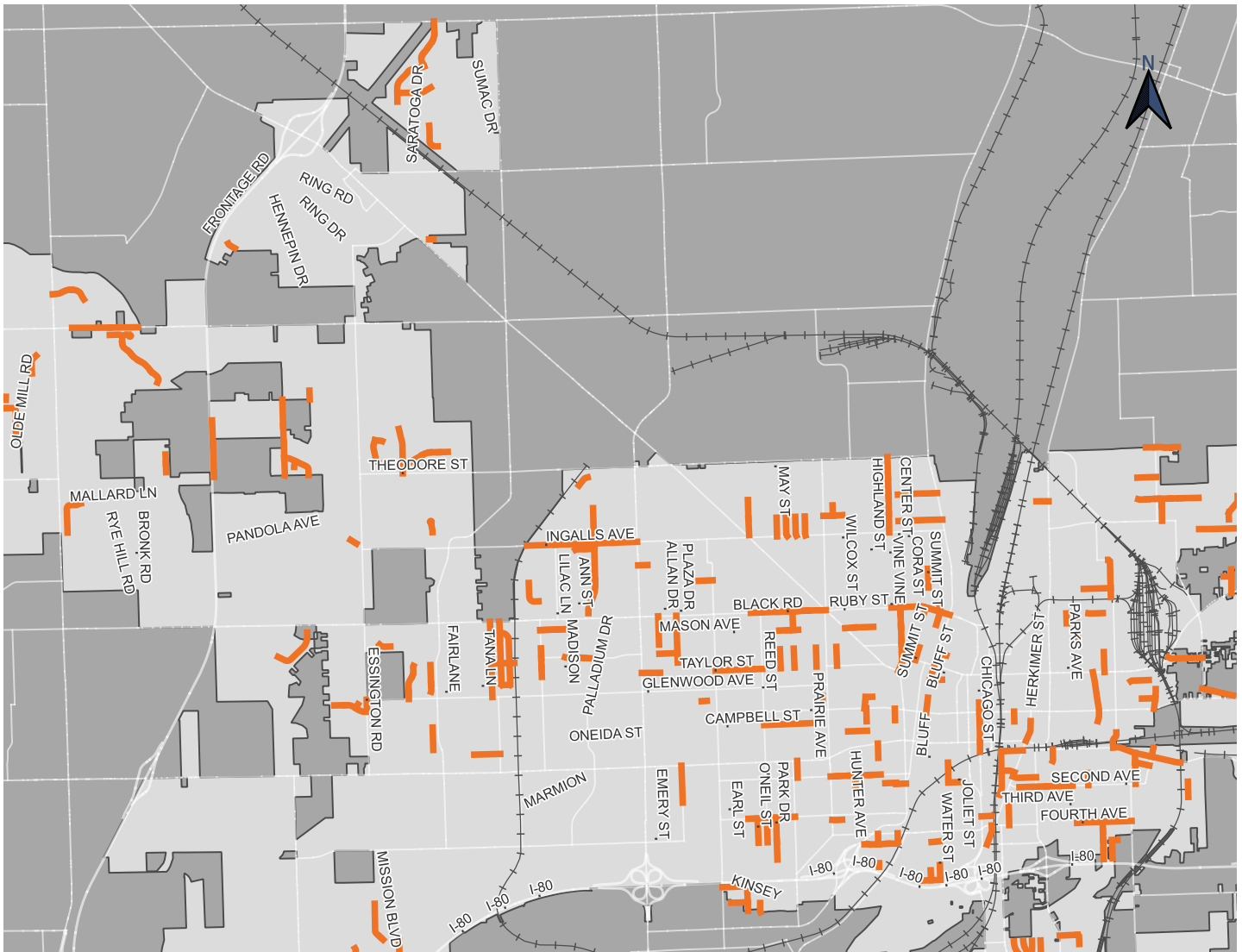
— Capital Projects (2017-2021)

Exhibit H-9: Capital Projects (2017-2021)



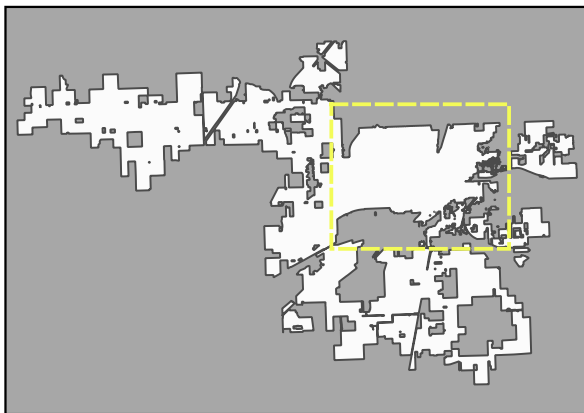
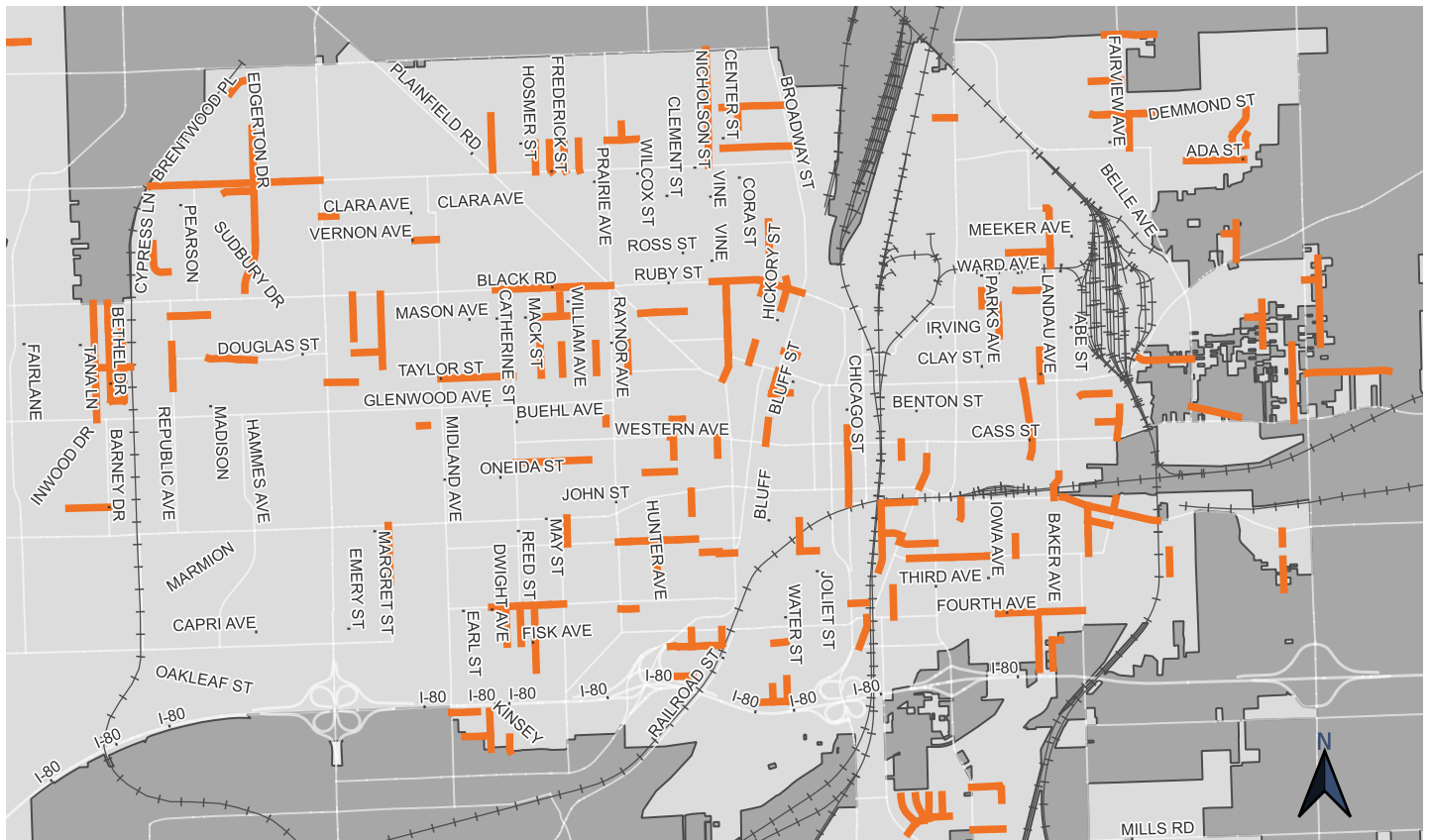
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Exhibit H-10: Capital Projects (2017-2021)



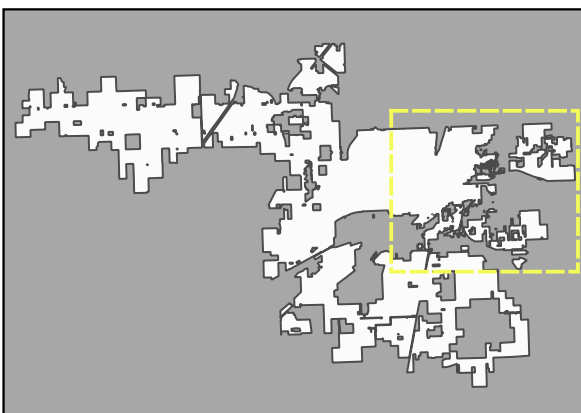
— Capital Projects (2017-2021)

Exhibit H-11: Capital Projects (2017-2021)



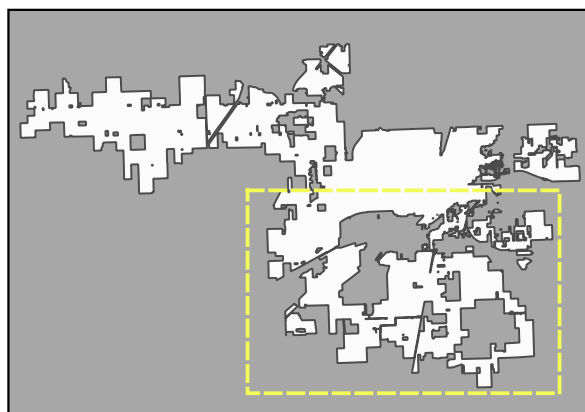
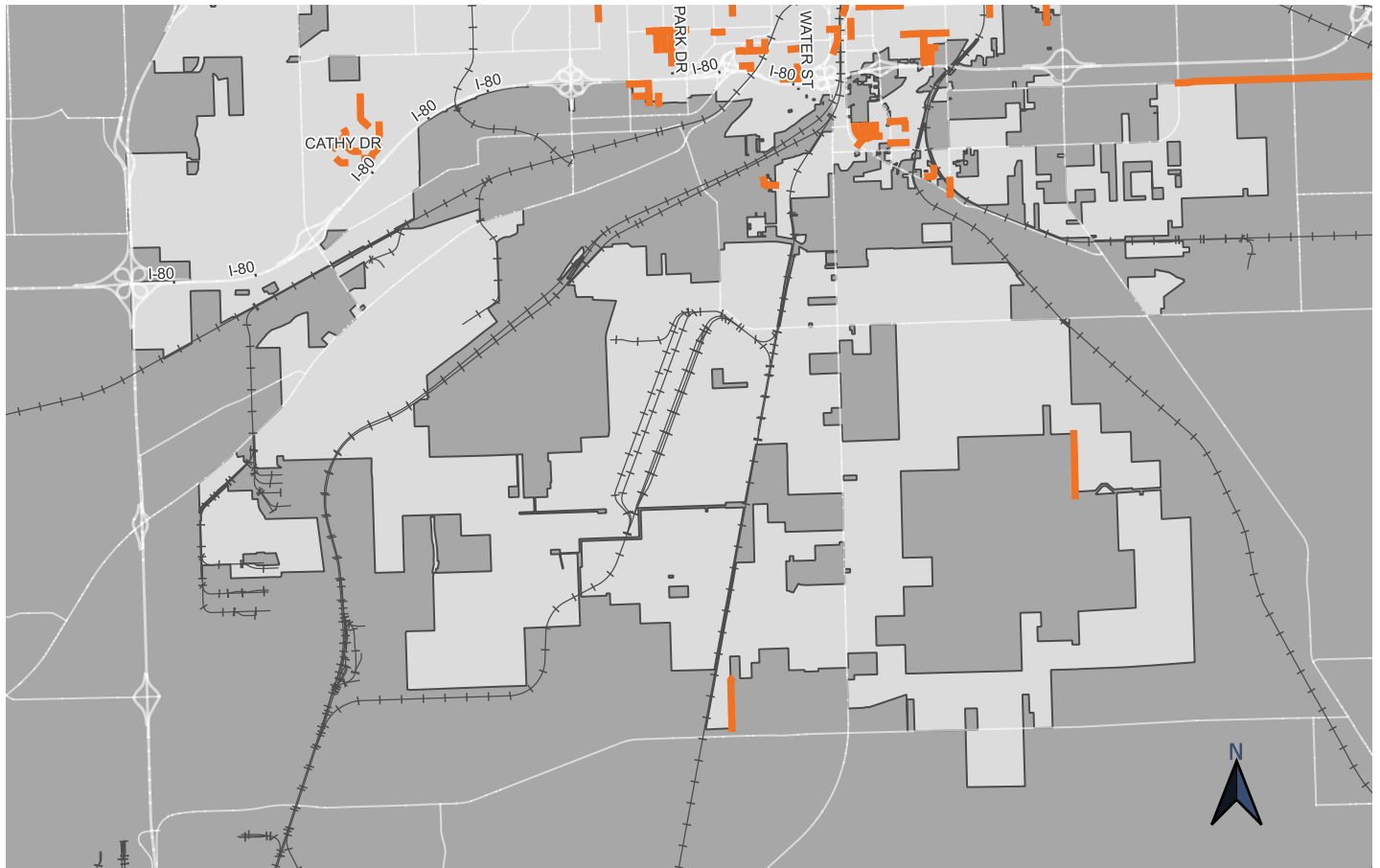
— Capital Projects (2017-2021)

Exhibit H-12: Capital Projects (2017-2021)



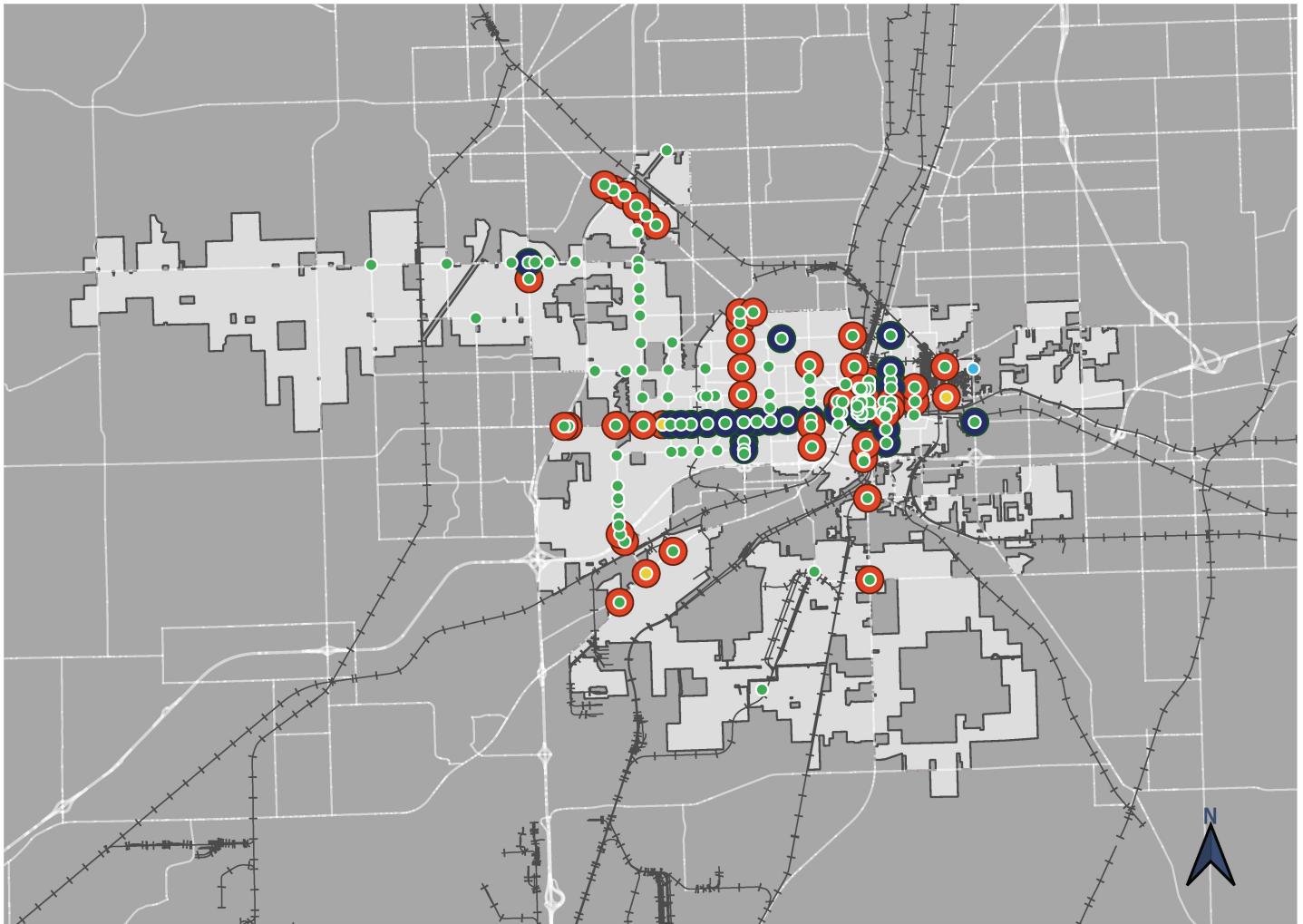
— Capital Projects (2017-2021)

Exhibit H-13: Capital Projects (2017-2021)



— Capital Projects (2017-2021)

Exhibit H-14: Traffic Signal Jurisdiction



Signals

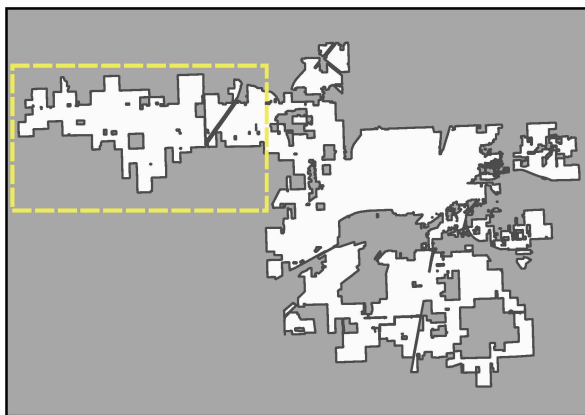
Traffic Signal Jurisdiction

- IDOT
- City of Joliet
- Will County

Pedestrian Signal

- No Pedestrian Signal
- Pedestrian Signal

Exhibit H-15: Traffic Signal Jurisdiction



Signals

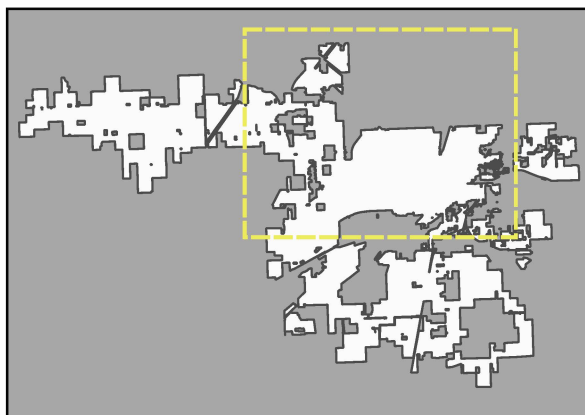
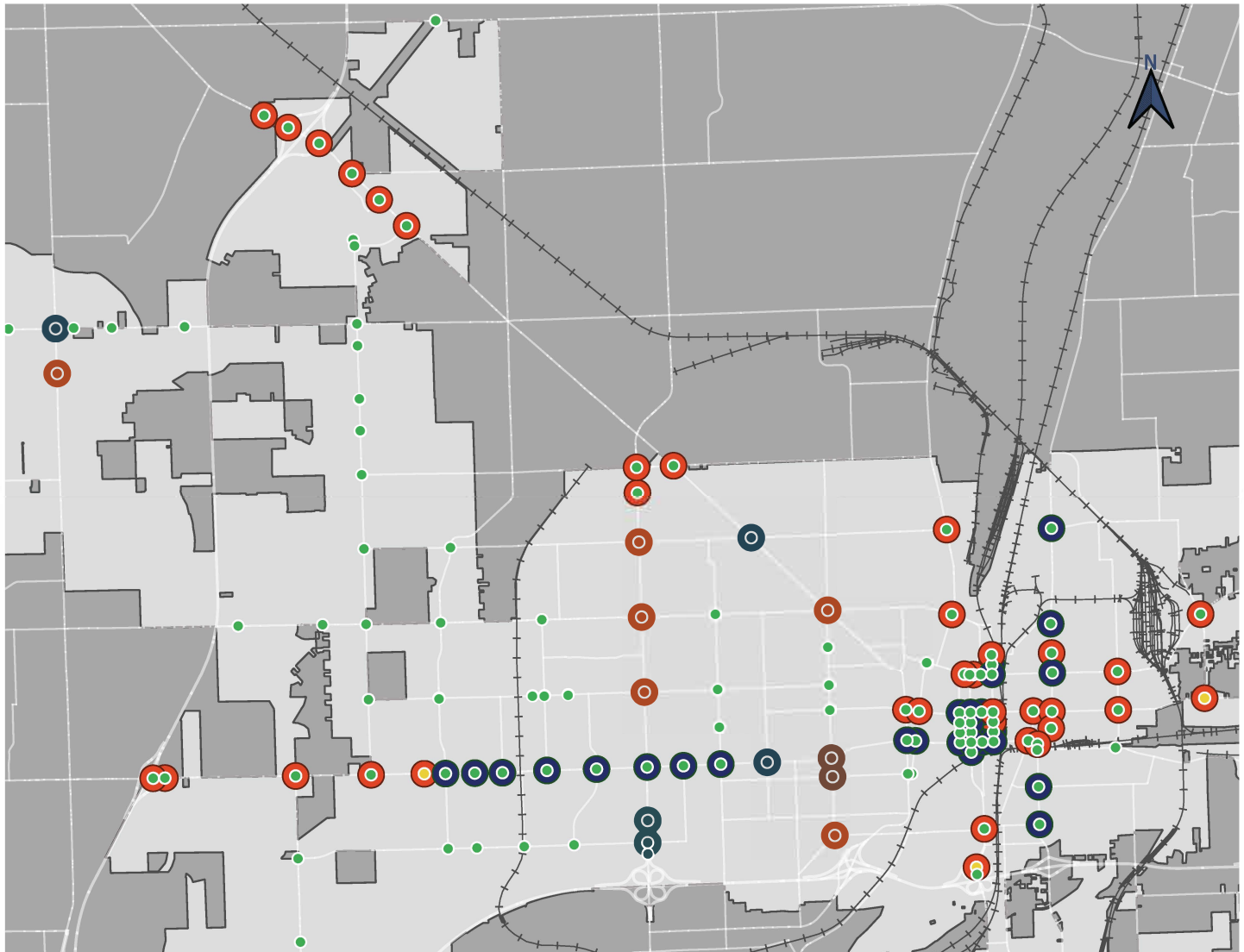
Traffic Signal Jurisdiction

- IDOT
- City of Joliet
- Will County

Pedestrian Signal

- No Pedestrian Signal
- Pedestrian Signal

Exhibit H-16: Traffic Signal Jurisdiction



Signals

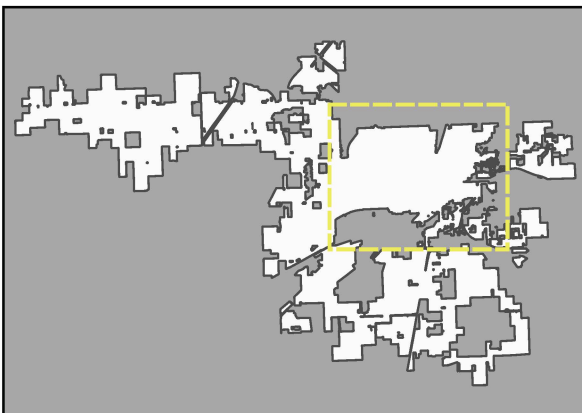
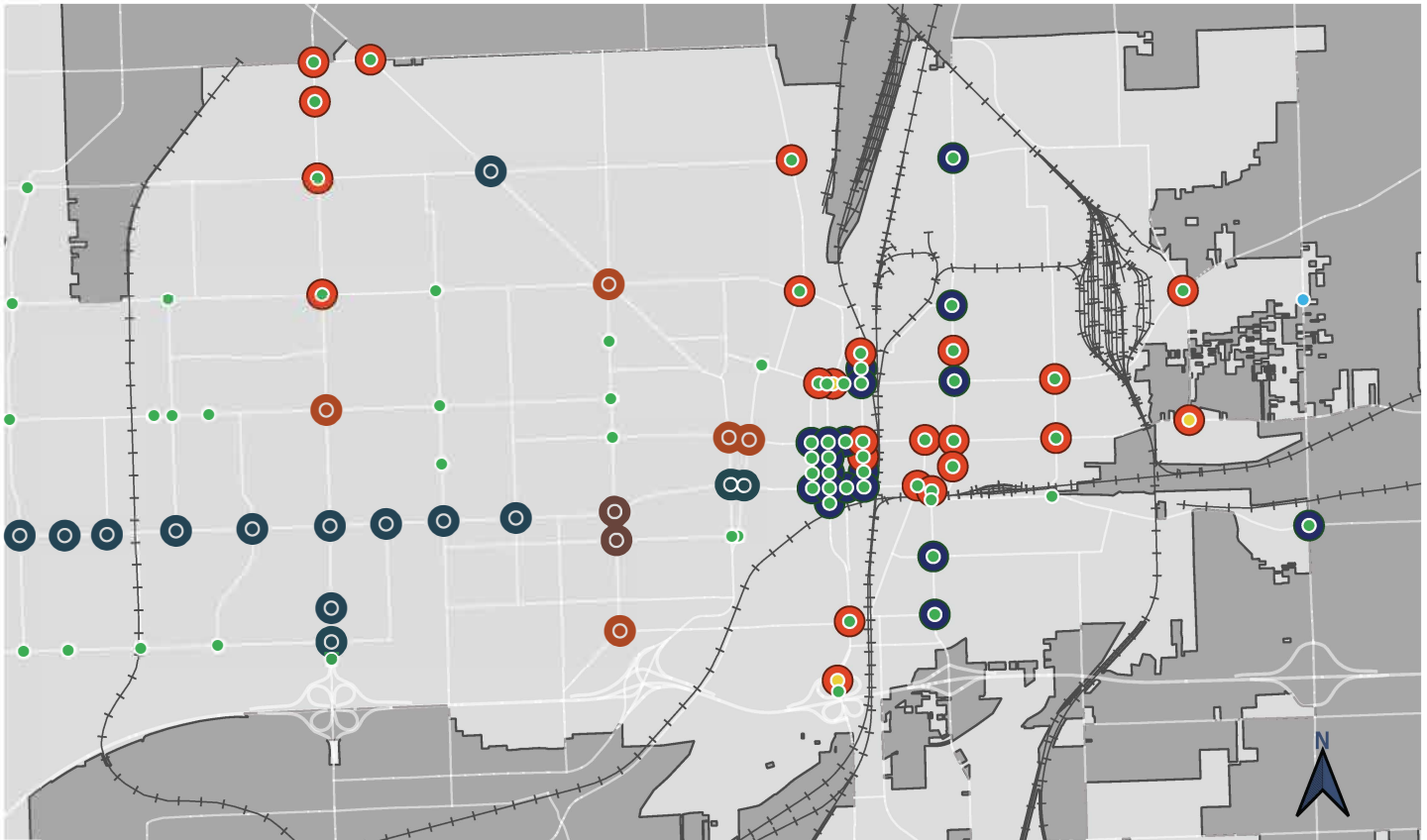
Traffic Signal Jurisdiction

- IDOT
- City of Joliet
- Will County

Pedestrian Signal

- No Pedestrian Signal
- Pedestrian Signal

Exhibit H-17: Traffic Signal Jurisdiction



Signals

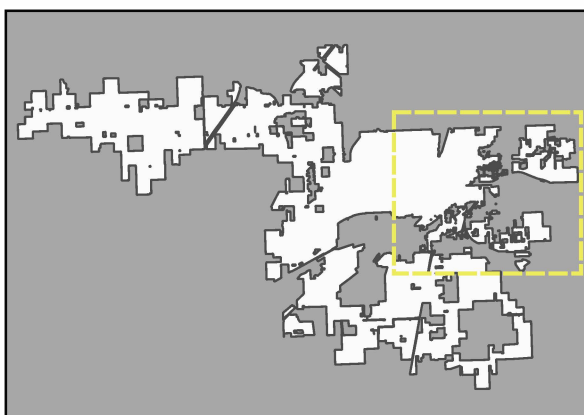
Traffic Signal Jurisdiction

- IDOT
- City of Joliet
- Will County

Pedestrian Signal

- No Pedestrian Signal
- Pedestrian Signal

Exhibit H-18: Traffic Signal Jurisdiction



Signals

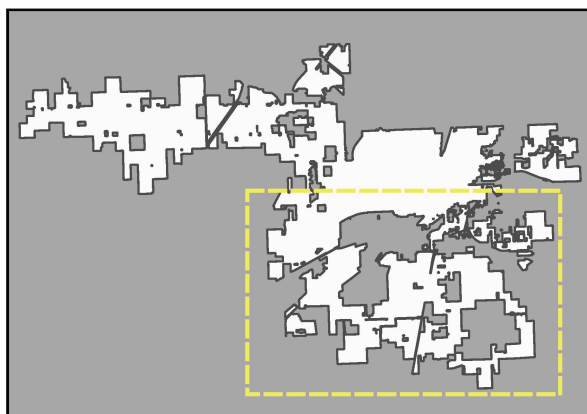
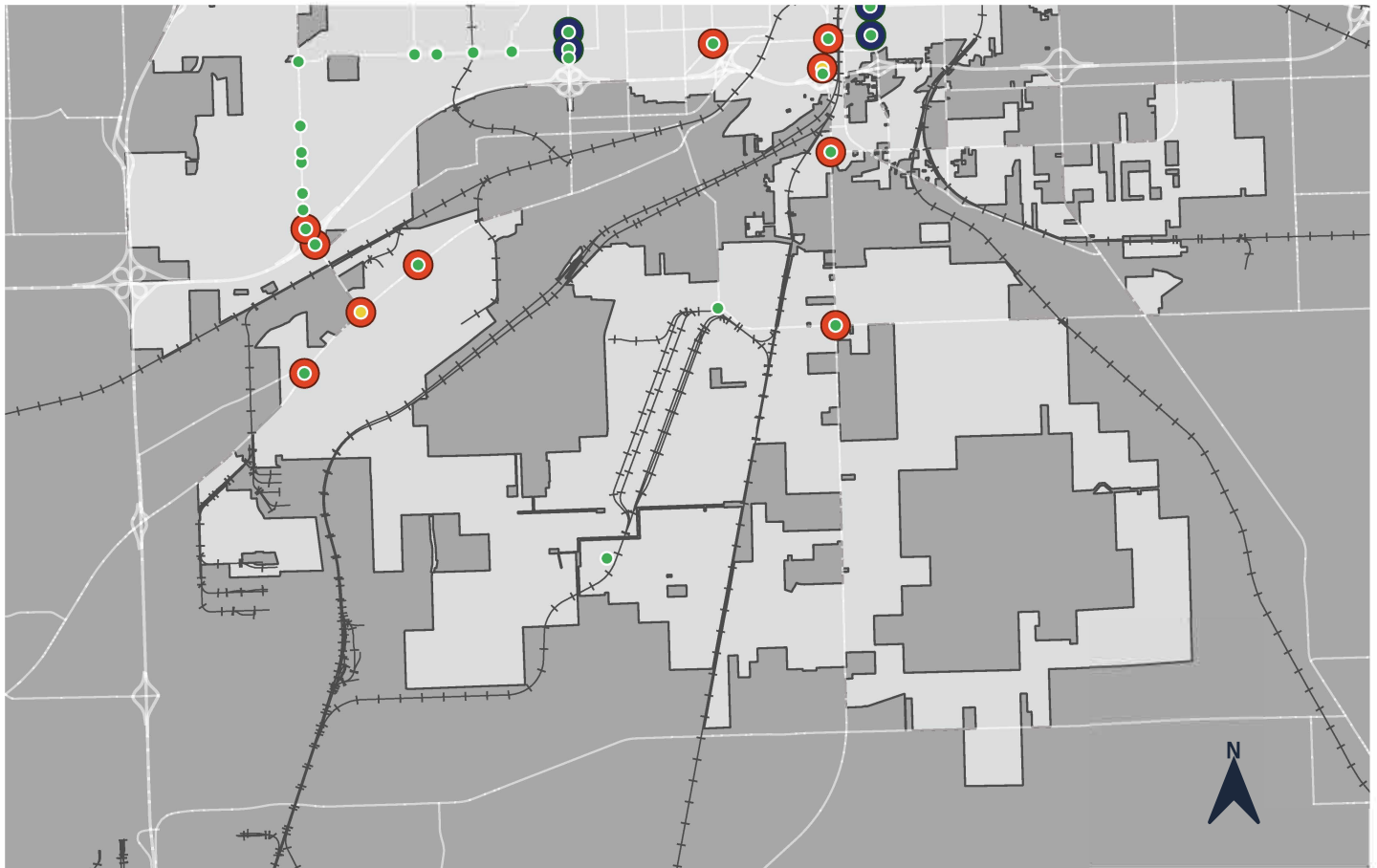
Traffic Signal Jurisdiction

- IDOT
- City of Joliet
- Will County

Pedestrian Signal

- No Pedestrian Signal
- Pedestrian Signal

Exhibit H-19: Traffic Signal Jurisdiction



Signals

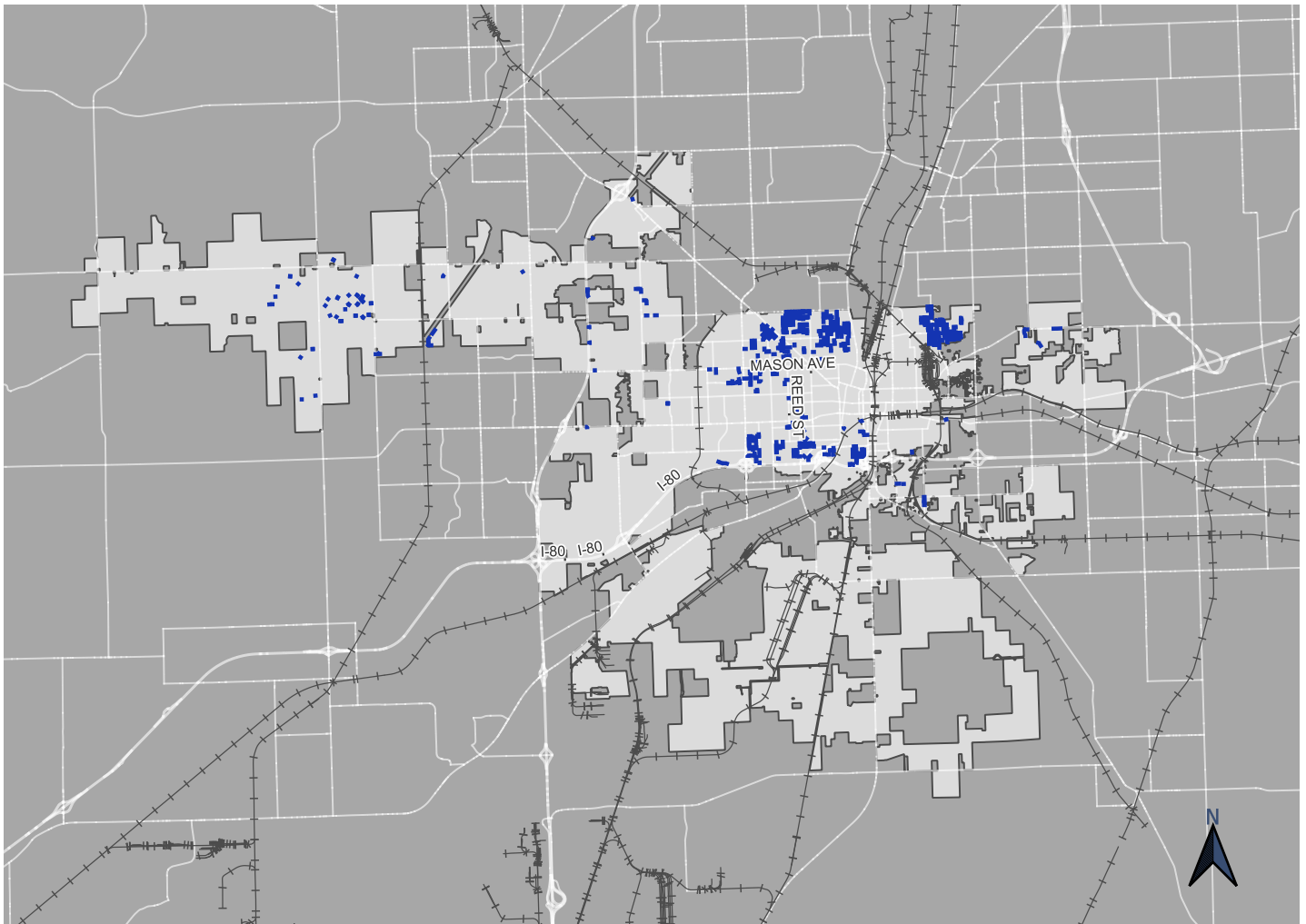
Traffic Signal Jurisdiction

- IDOT
- City of Joliet
- Will County

Pedestrian Signal

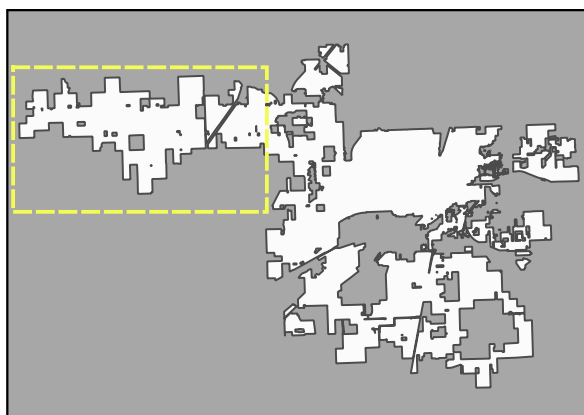
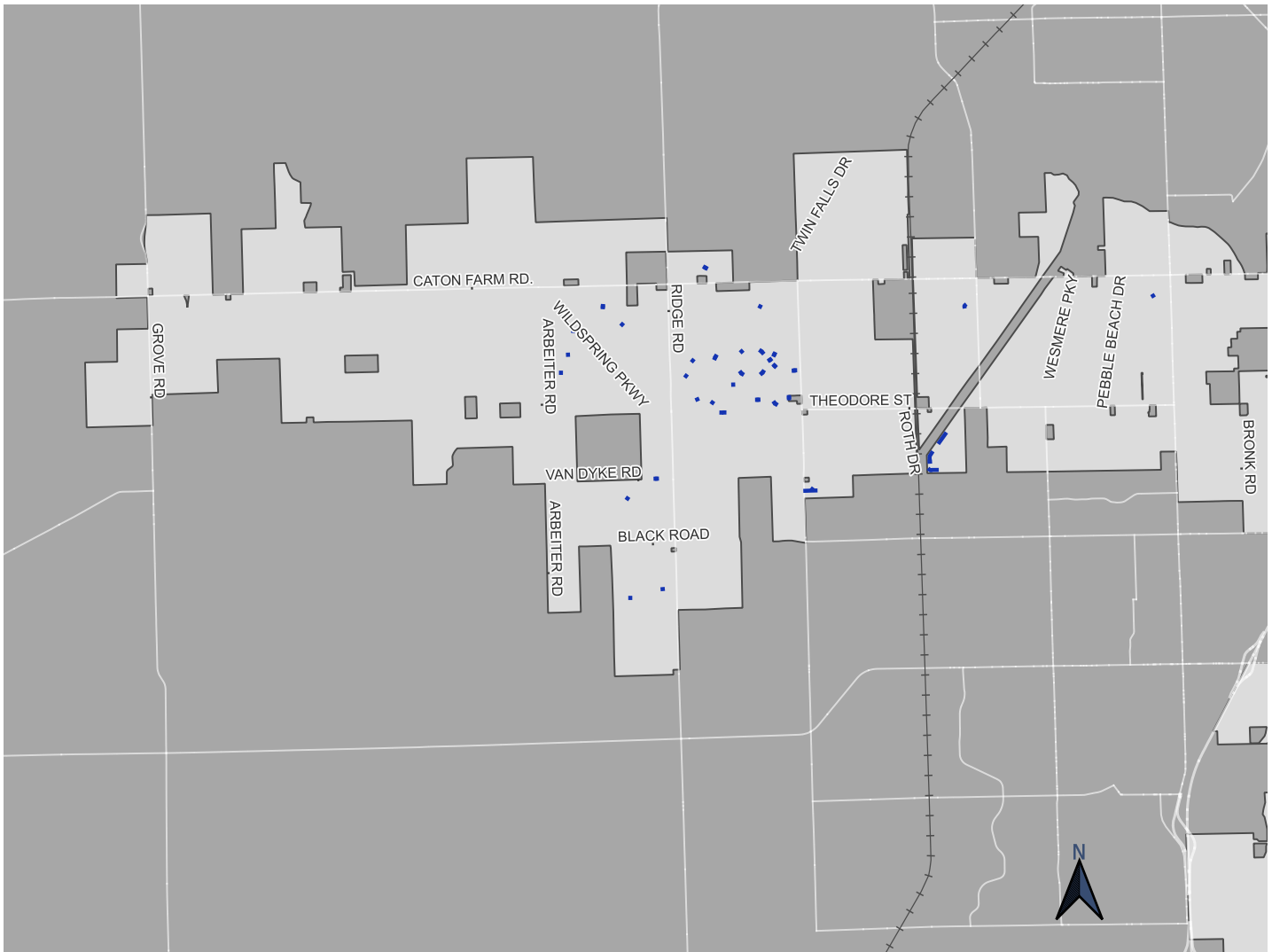
- No Pedestrian Signal
- Pedestrian Signal

Exhibit H-20: Sidewalk Gaps



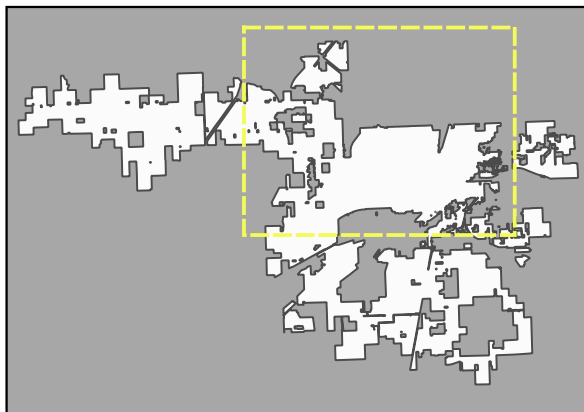
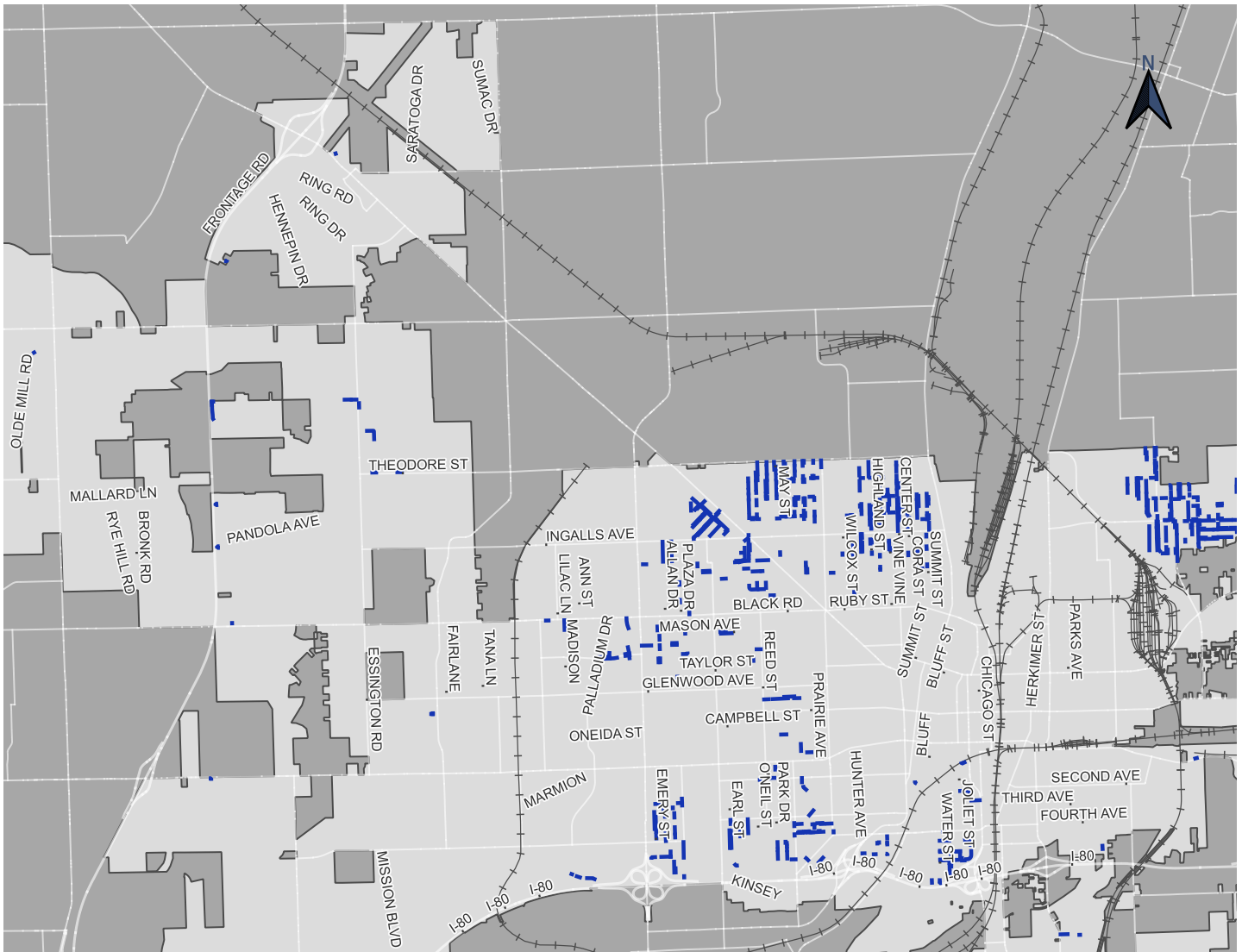
— Sidewalk Gaps

Exhibit H-21: Sidewalk Gaps



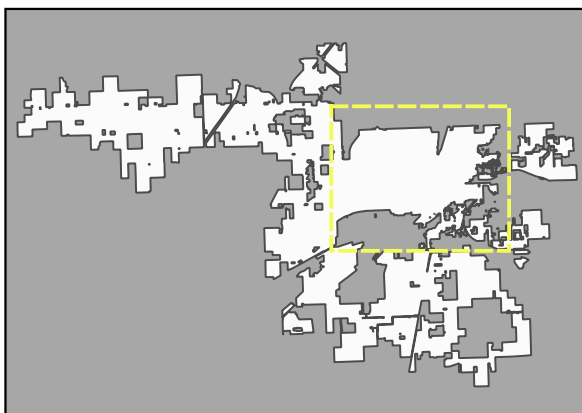
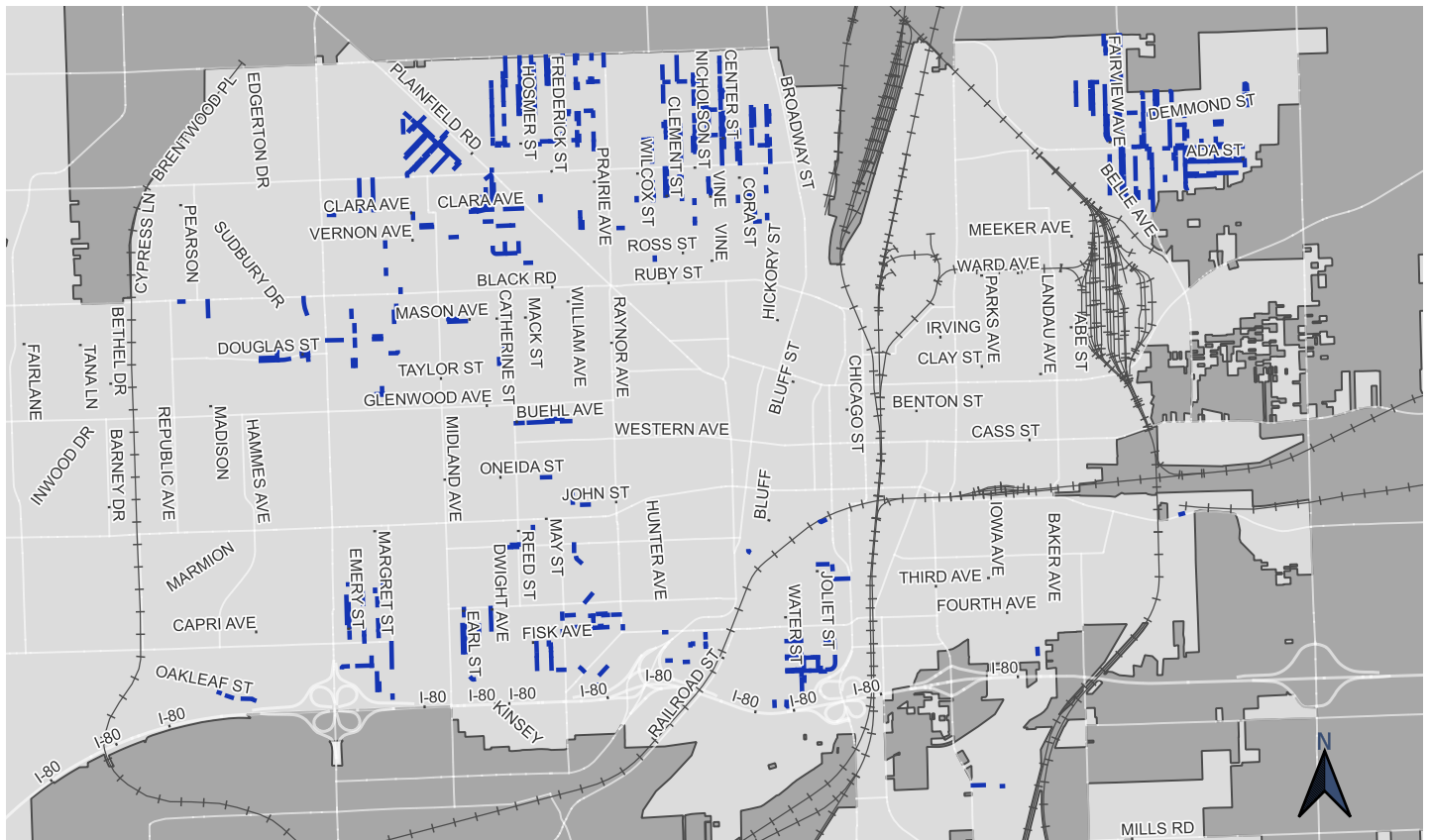
— Sidewalk Gaps

Exhibit H-22: Sidewalk Gaps



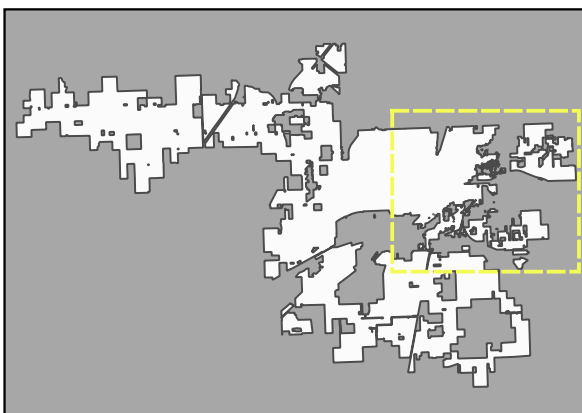
— Sidewalk Gaps

Exhibit H-23: Sidewalk Gaps



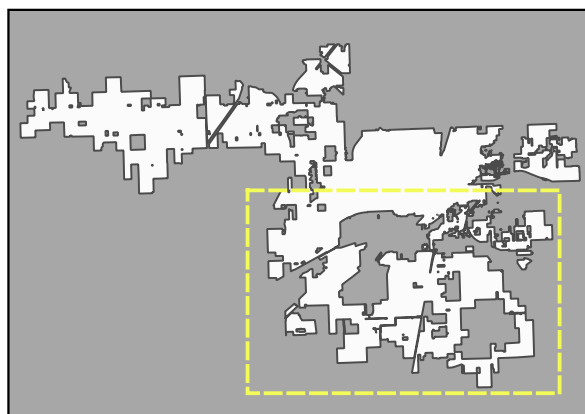
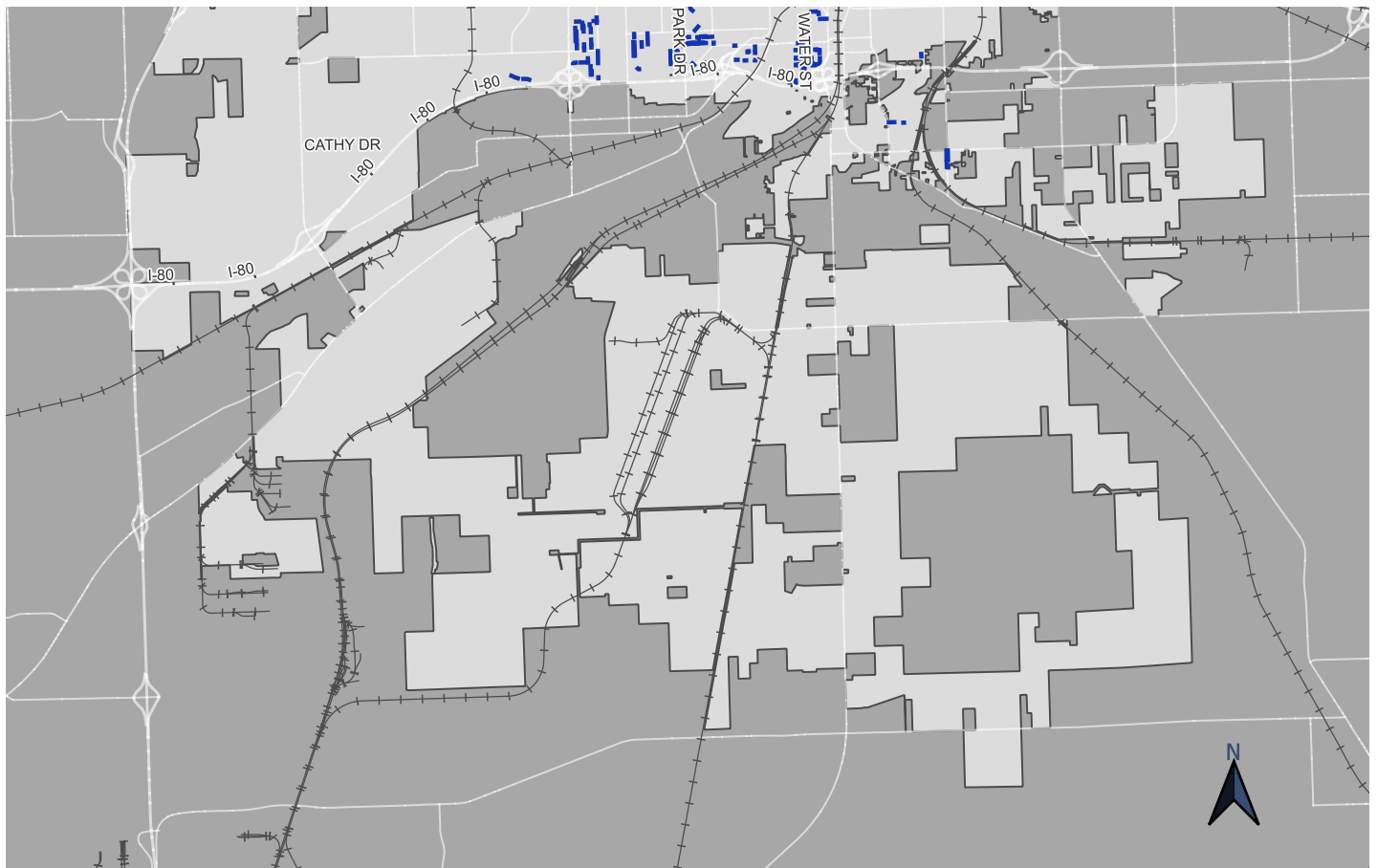
— Sidewalk Gaps

Exhibit H-24: Sidewalk Gaps



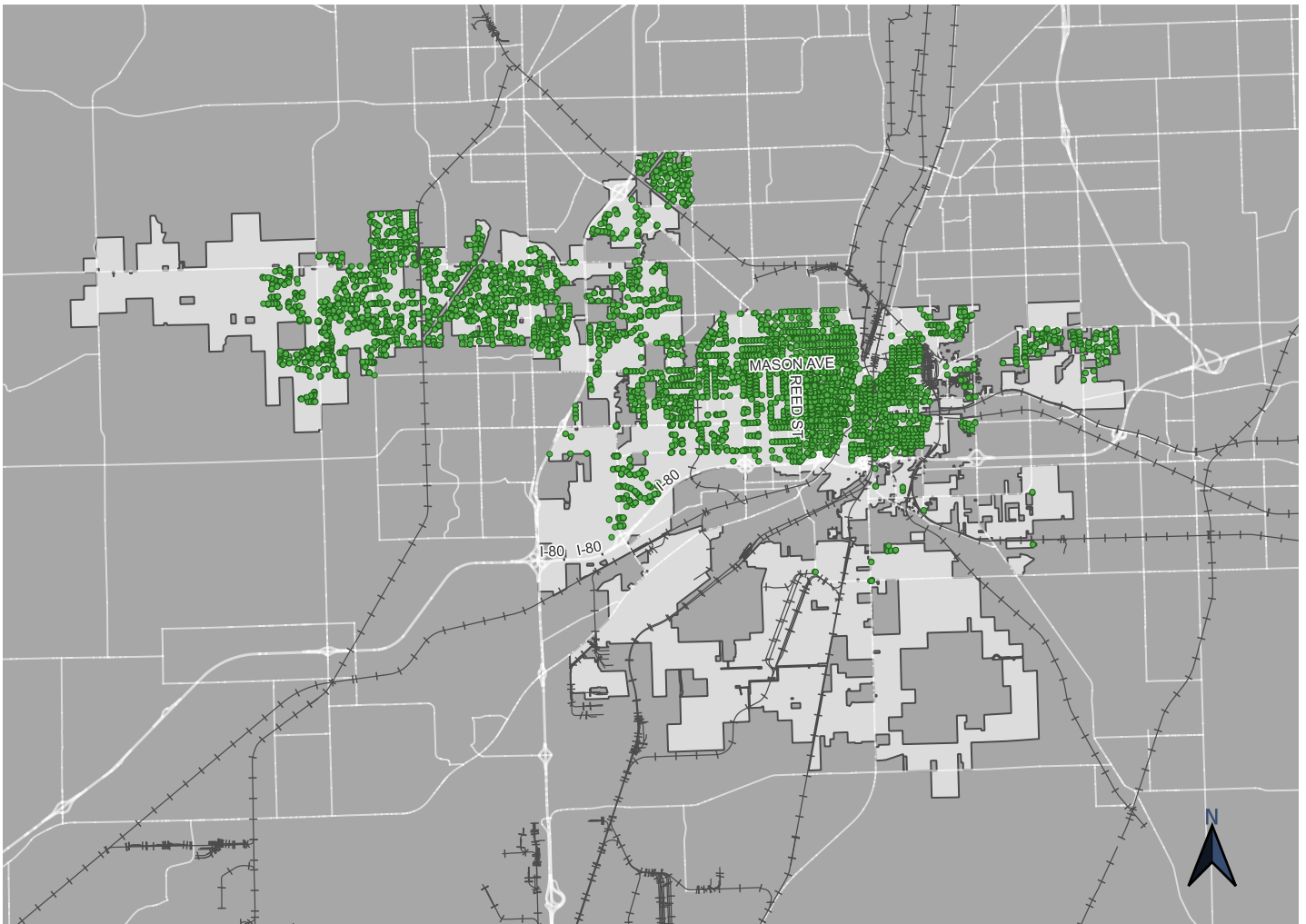
— Sidewalk Gaps

Exhibit H-25: Sidewalk Gaps



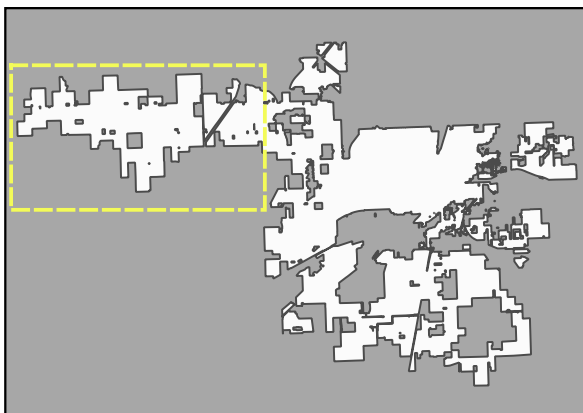
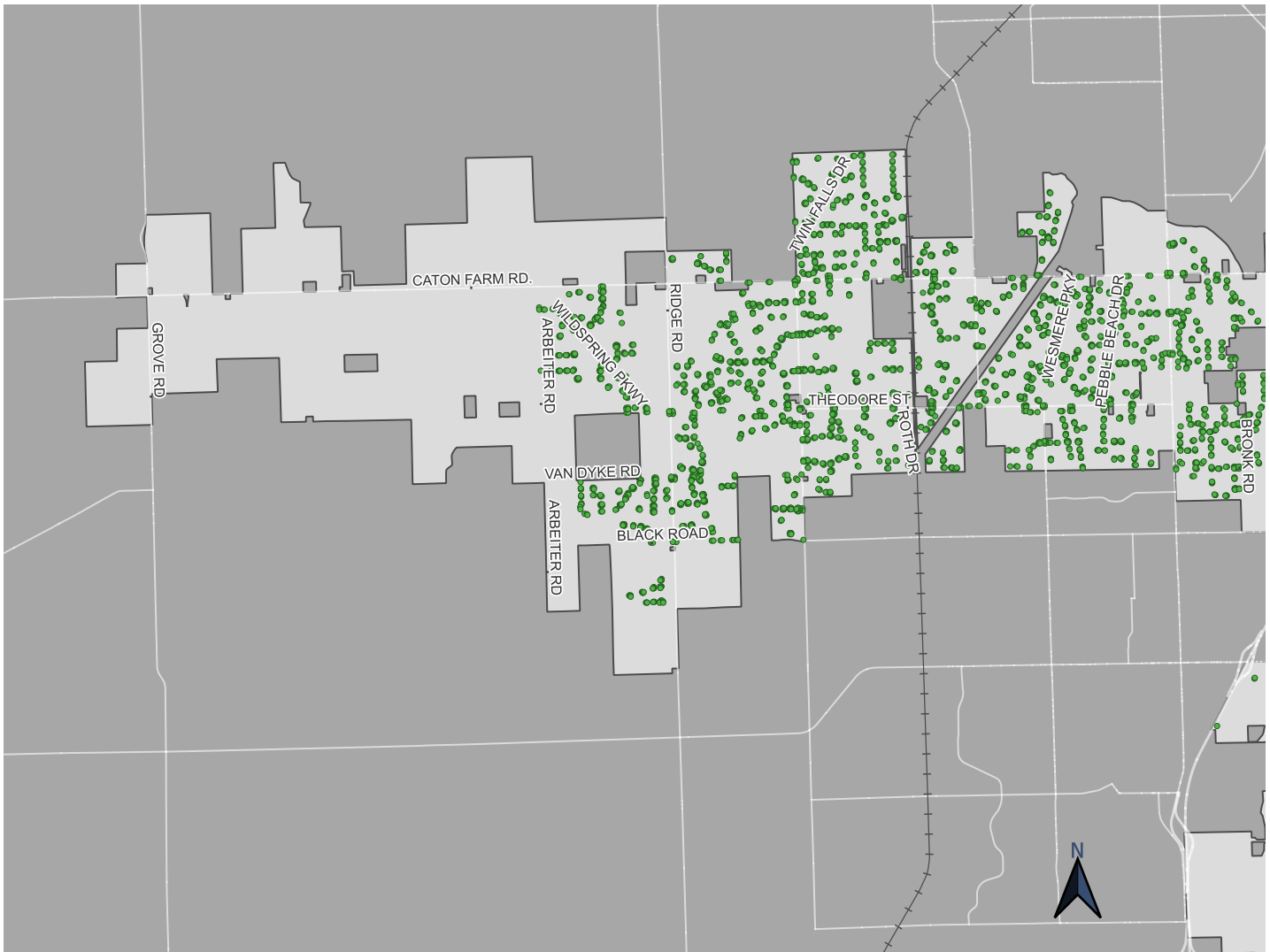
— Sidewalk Gaps

Exhibit H-26: Curb Ramps



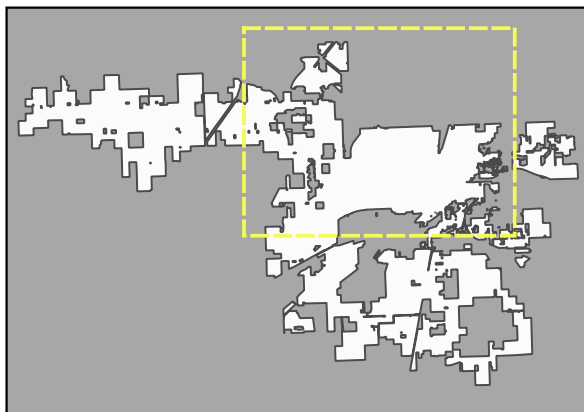
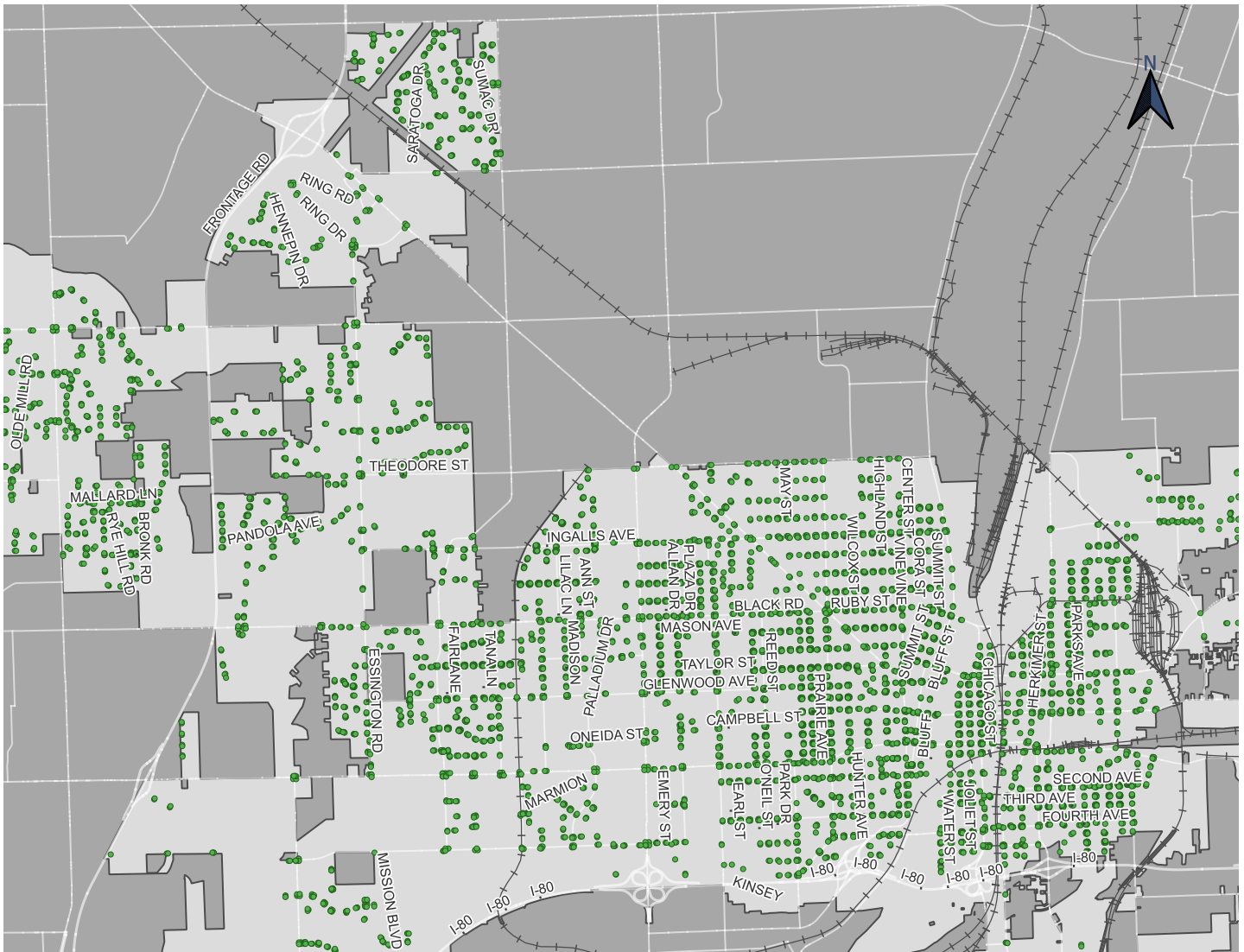
- Curb Ramps

Exhibit H-27: Curb Ramps



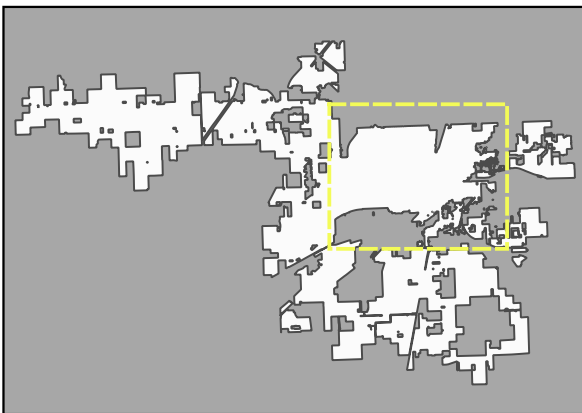
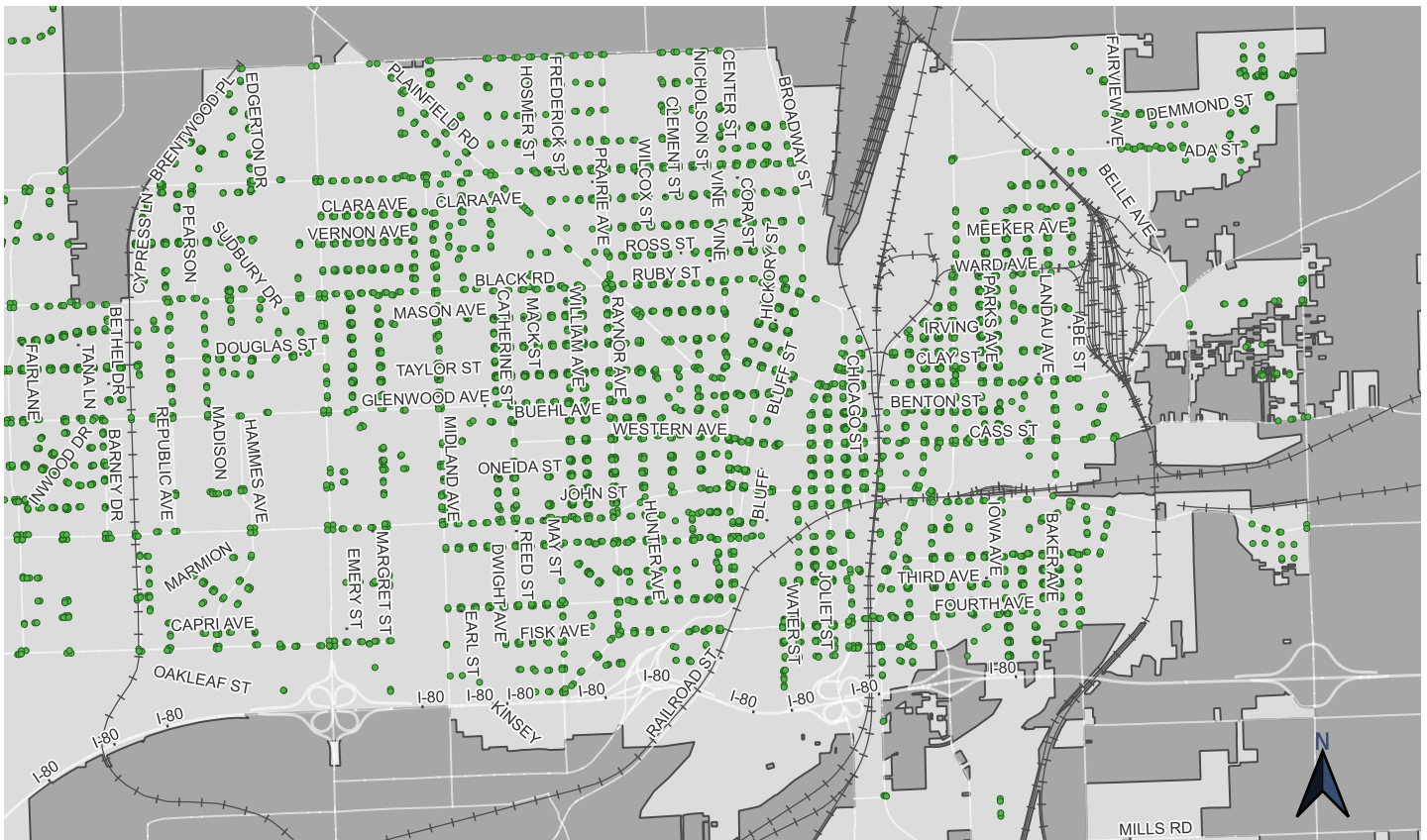
- Curb Ramps

Exhibit H-28: Curb Ramps



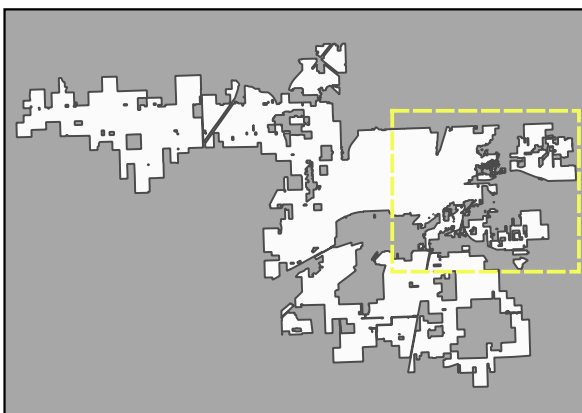
- Curb Ramps

Exhibit H-29: Curb Ramps



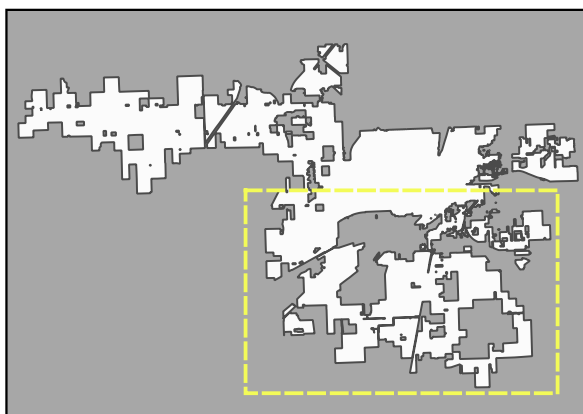
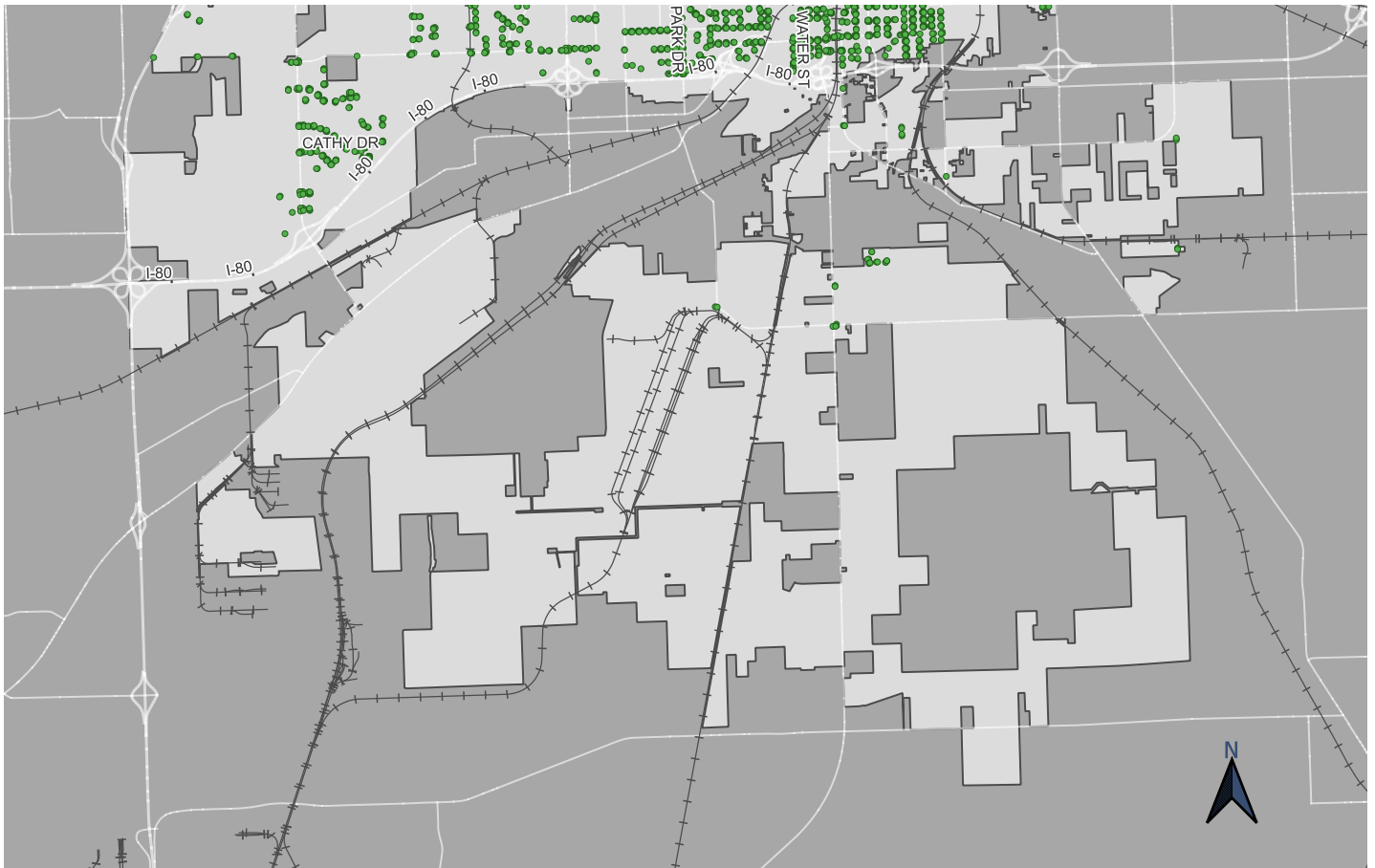
• Curb Ramps

Exhibit H-30: Curb Ramps



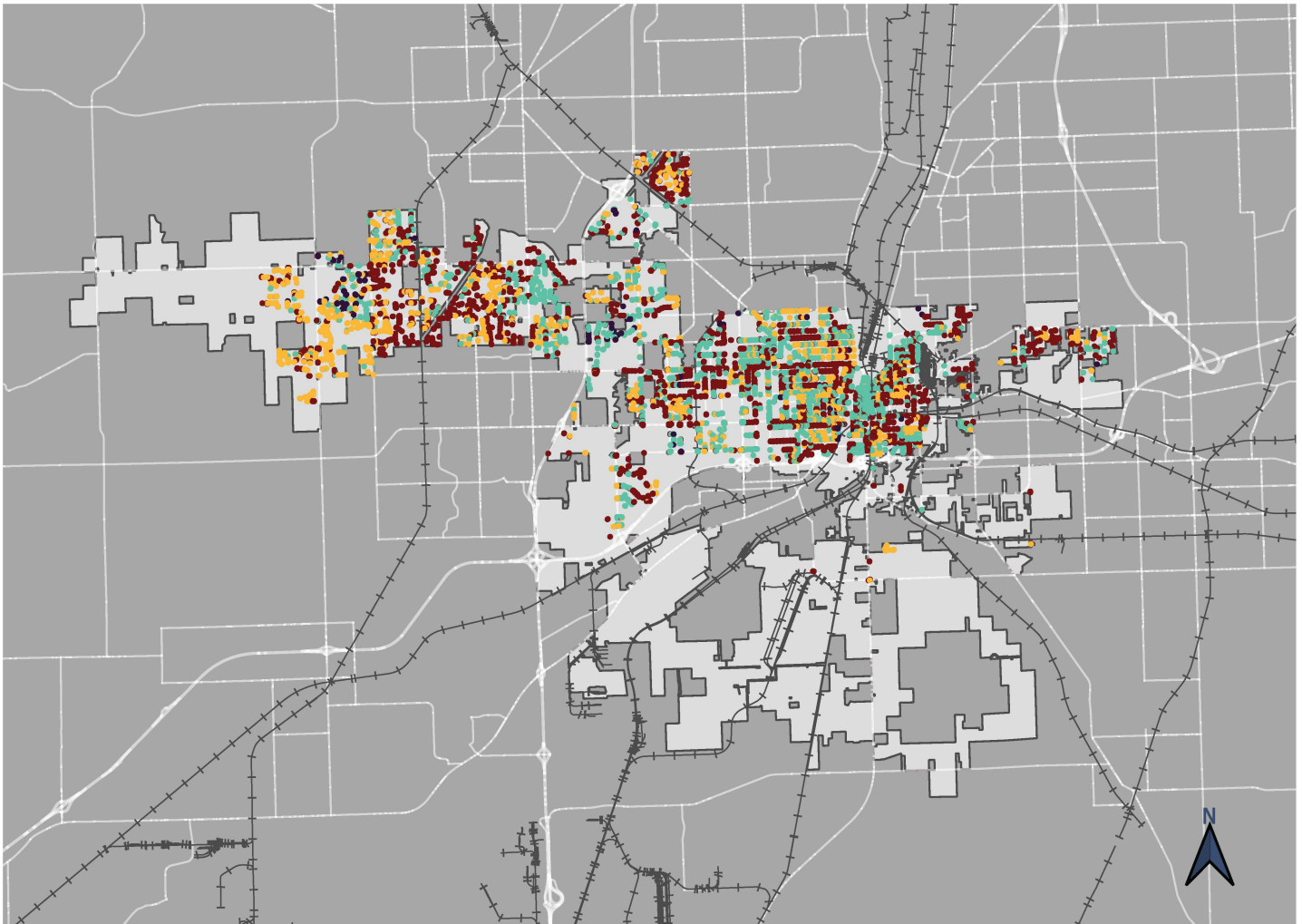
• Curb Ramps

Exhibit H-31: Curb Ramps



- Curb Ramps

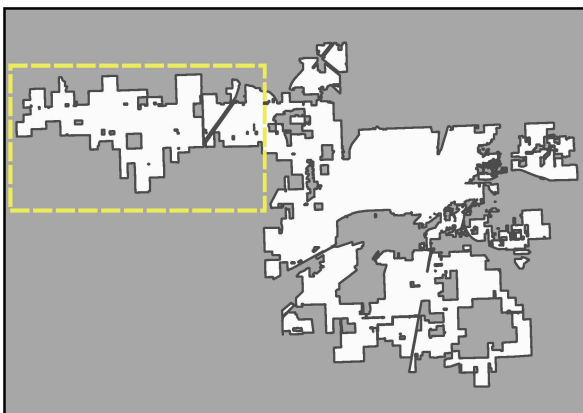
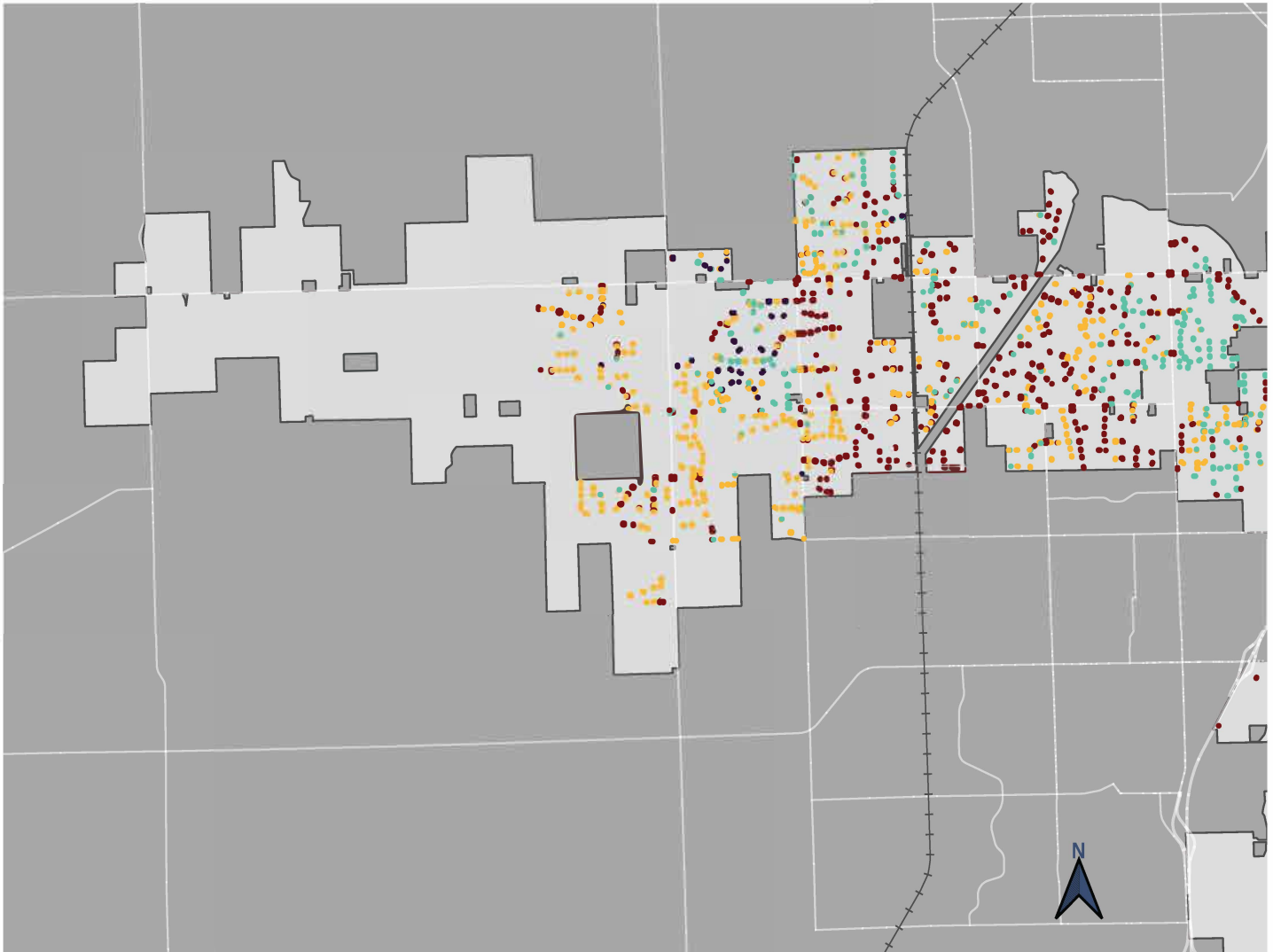
Exhibit H-32: Curb Ramps - Preliminary Evaluation Criteria



Curb Ramps - Criteria Met

- No curb ramp
- Curb ramp present without detectable warning or contrasting color
- Curb ramp present with detectable warning (no contrasting color)
- Curb ramp present with detectable warning and contrasting color

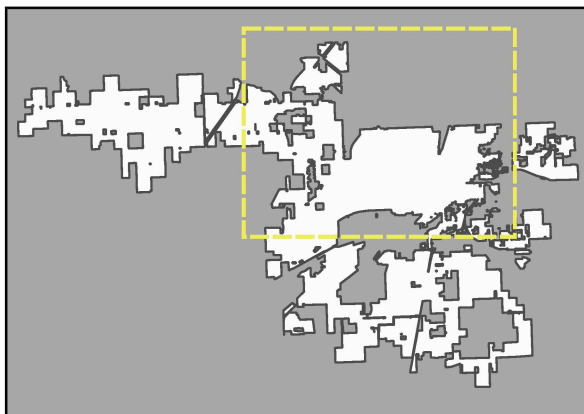
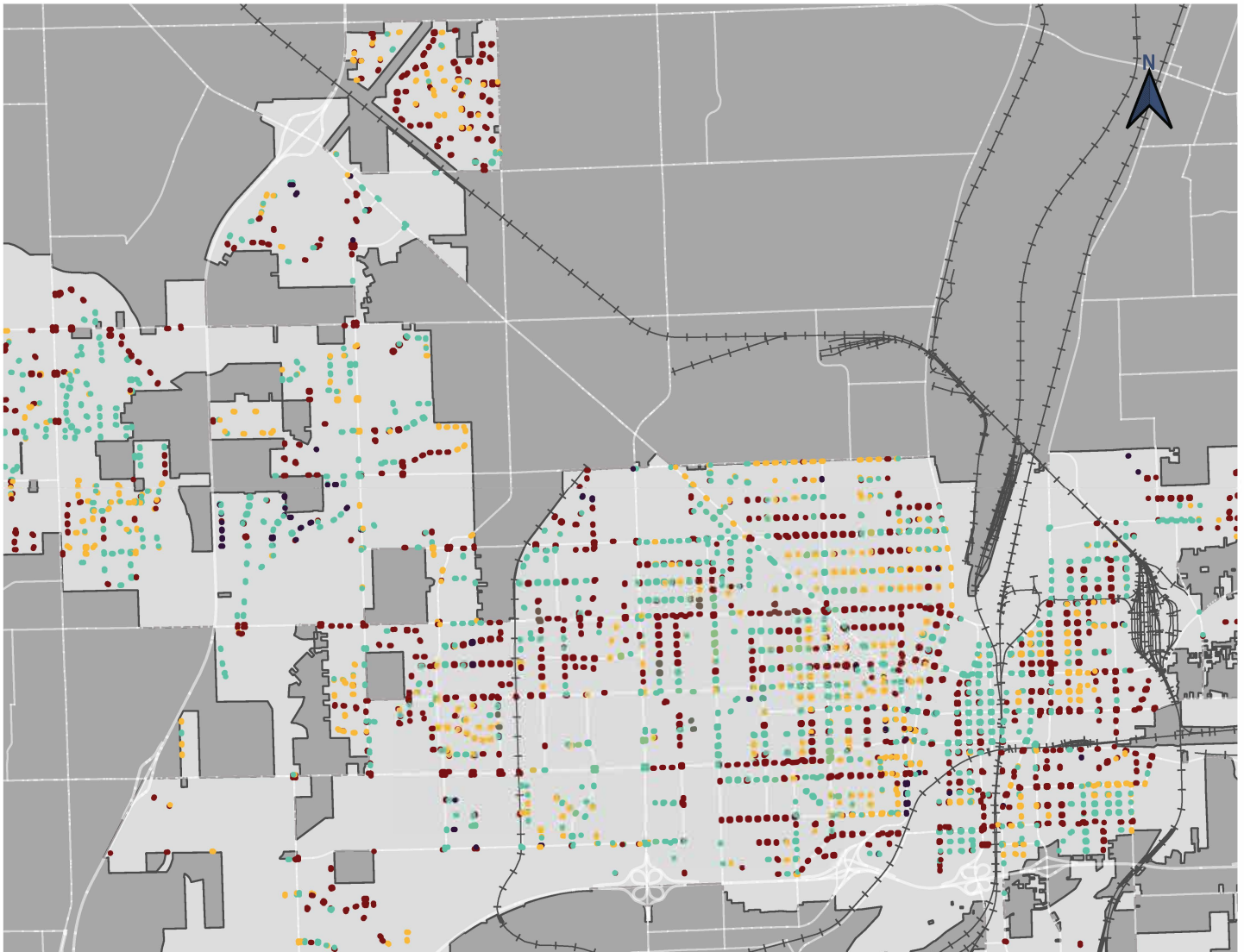
Exhibit H-33: Curb Ramps - Preliminary Evaluation Criteria



Curb Ramps - Criteria Met

- No curb ramp
- Curb ramp present without detectable warning or contrasting color
- Curb ramp present with detectable warning (no contrasting color)
- Curb ramp present with detectable warning and contrasting color

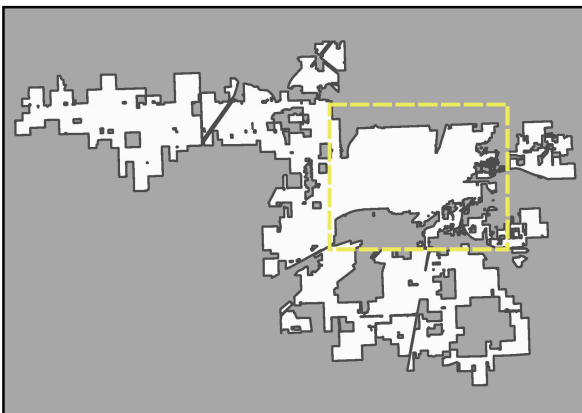
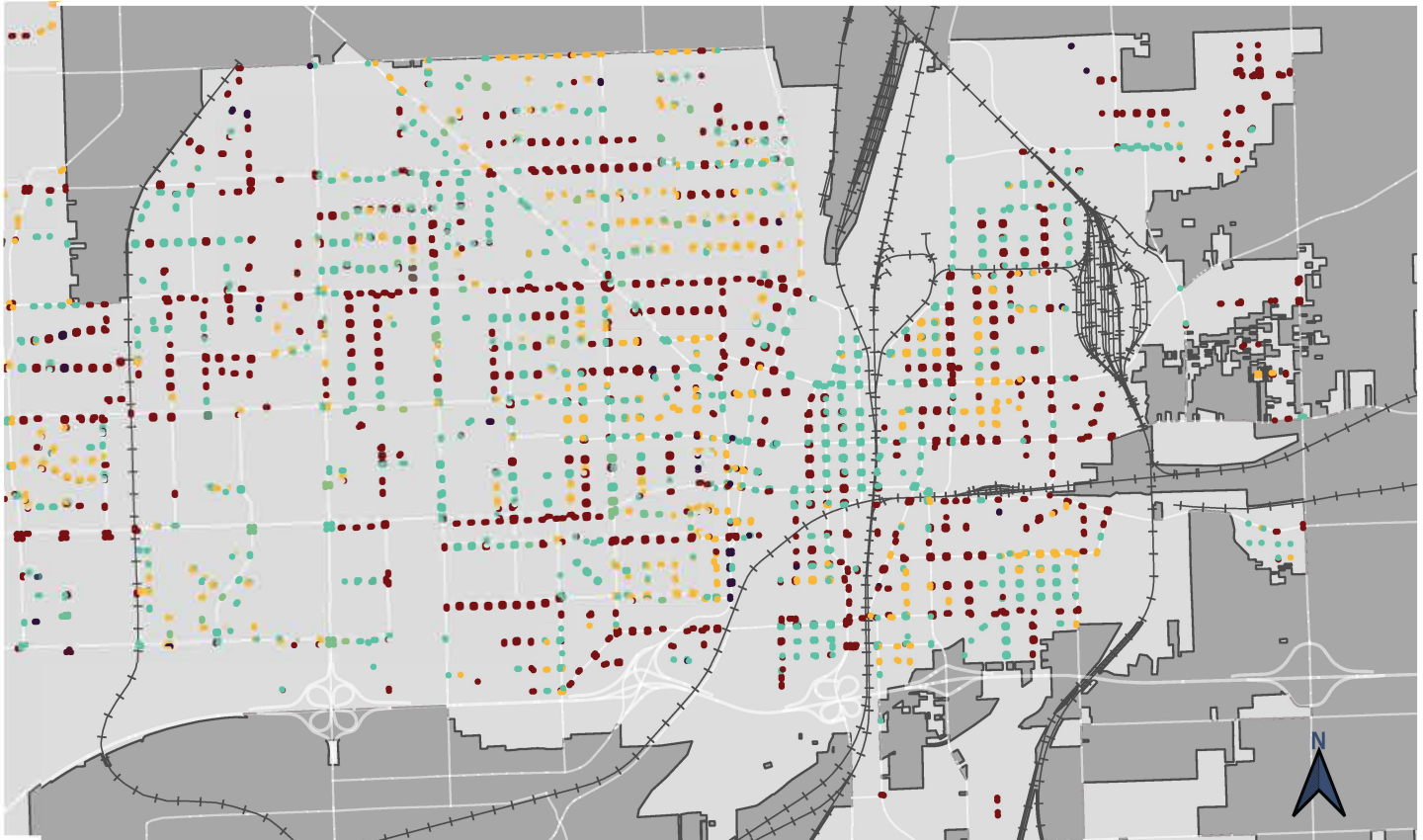
Exhibit H-34: Curb Ramps - Preliminary Evaluation Criteria



Curb Ramps - Criteria Met

- No curb ramp
- Curb ramp present without detectable warning or contrasting color
- Curb ramp present with detectable warning (no contrasting color)
- Curb ramp present with detectable warning and contrasting color

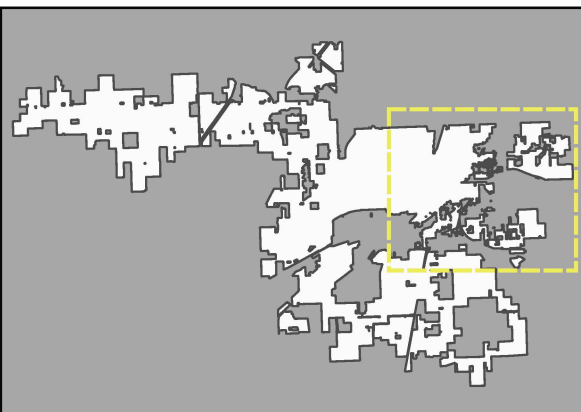
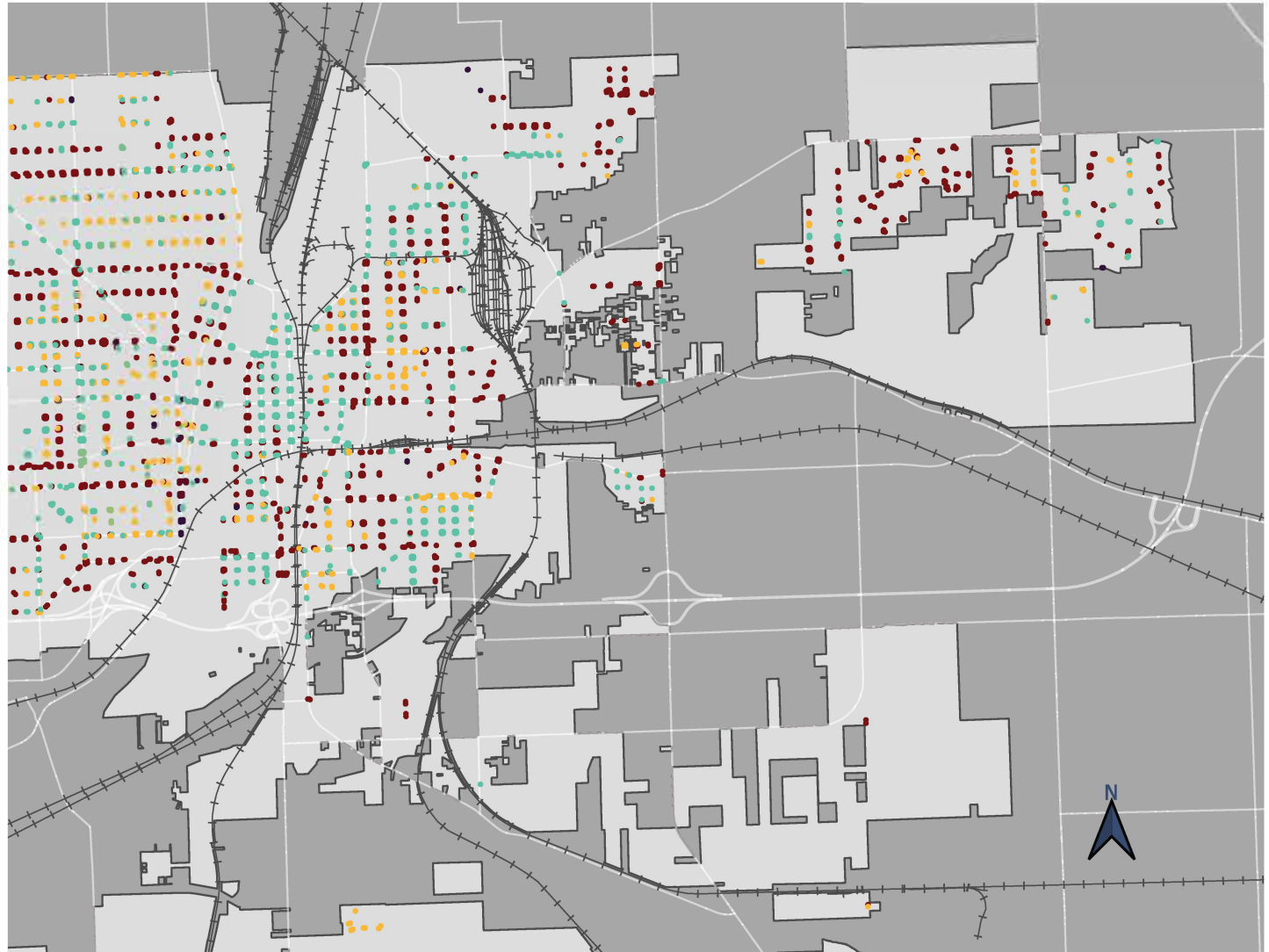
Exhibit H-35: Curb Ramps - Preliminary Evaluation Criteria



Curb Ramps - Criteria Met

- No curb ramp
- Curb ramp present without detectable warning or contrasting color
- Curb ramp present with detectable warning (no contrasting color)
- Curb ramp present with detectable warning and contrasting color

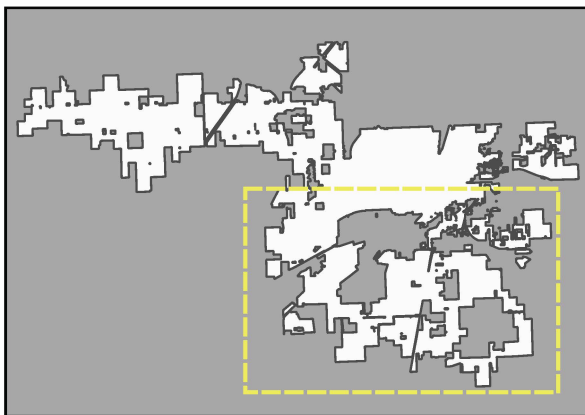
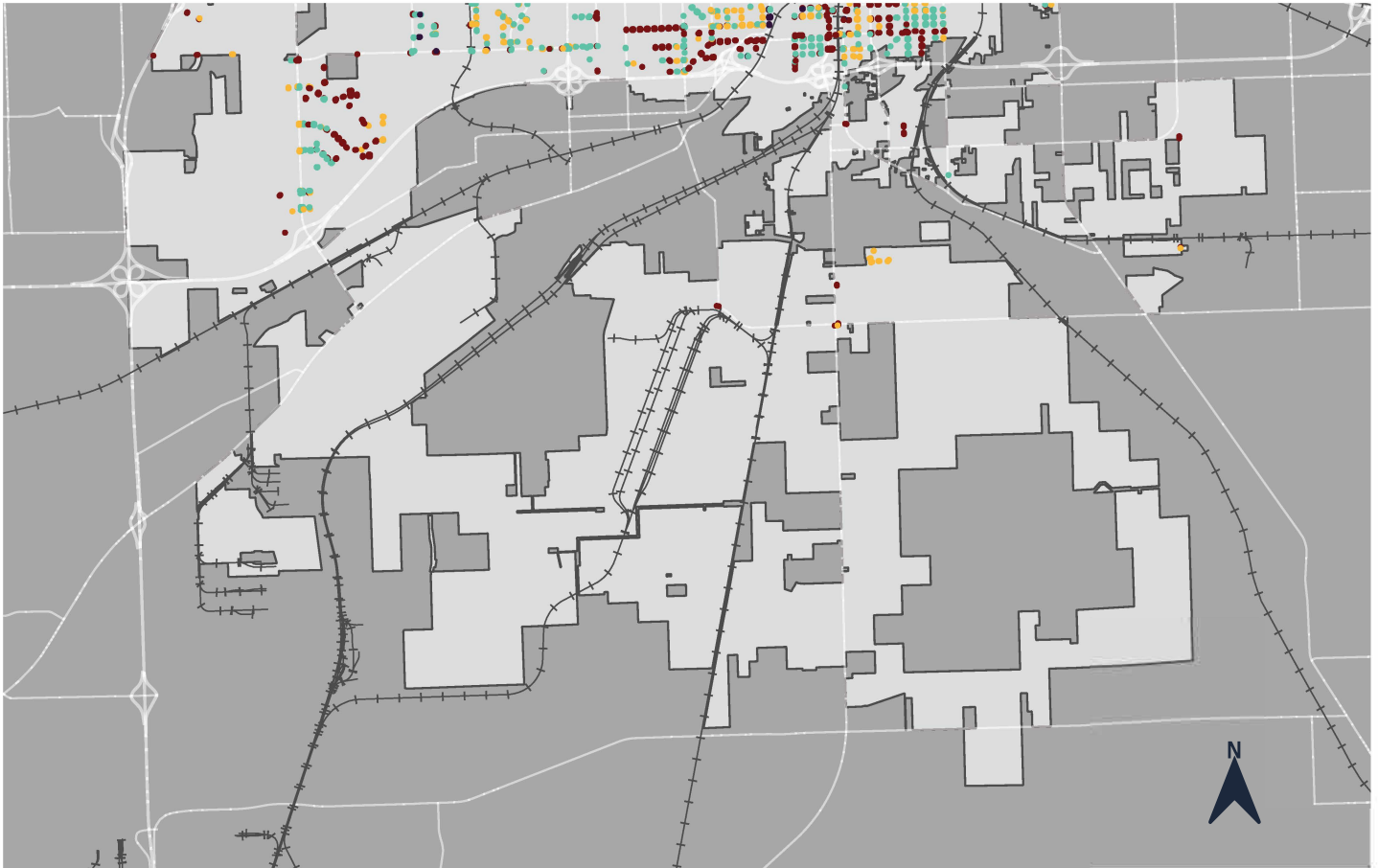
Exhibit H-36: Curb Ramps - Preliminary Evaluation Criteria



Curb Ramps - Criteria Met

- No curb ramp
- Curb ramp present without detectable warning or contrasting color
- Curb ramp present with detectable warning (no contrasting color)
- Curb ramp present with detectable warning and contrasting color

Exhibit H-37: Curb Ramps - Preliminary Evaluation Criteria



Curb Ramps - Criteria Met

- No curb ramp
- Curb ramp present without detectable warning or contrasting color
- Curb ramp present with detectable warning (no contrasting color)
- Curb ramp present with detectable warning and contrasting color