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## 1.0 INTRODUCTION

### 1.1 Legislative Mandate

The Americans with Disabilities Act (ADA) is a civil rights law that mandates equal opportunity for individuals with disabilities. The ADA prohibits discrimination to jobs, public accommodations, government services, public transportation, and telecommunications. Title II of the ADA also requires that all Programs, Services and Activities (PSAs) of public entities provide equal access for individuals with disabilities.

The City of Grove has undertaken a comprehensive evaluation of its policies, programs and facilities to determine the extent to which individuals with disabilities may be restricted in their access to City services and activities.

### 1.2 ADA Self-Evaluation and Transition Plan Development Requirements and Process

The City of Grove is obligated to observe all requirements of Title I in its employment practices; Title II in its policies, programs and services; any parts of Titles IV and V that apply to the City and its programs, services, or facilities and all requirements specified in the most current ADA Standards and all amendments made thereto and the most current Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG) and all amendments made thereto that apply to facilities and other physical holdings.

Title II has the broadest impact on the City of Grove. Included in Title II are administrative requirements for all government entities employing more than fifty (50) people. These administrative requirements are:

- Designation of an ADA Coordinator;
- Completion of a self-evaluation;
- Development of ADA compliant procedure;
- Designation of a Transition Plan to schedule the removal of barriers uncovered by the self-evaluation process

This document describes the process development to complete the evaluation of the City of Grove's activities, provides policy and program recommendations, and presents a Transition Plan for the modification of facilities, public rights-of way, and programs to improve accessibility, which will guide the planning and implementation of necessary program and facility modifications. The ADA Self-Evaluation and Transition Plan is significant in that it establishes the City's ongoing commitment to the development and maintenance of policies, programs and facilities that accommodate all its citizens.

### 1.3 Discrimination and Accessibility

Programmatic accessibility means that, when viewed in its entirety, each program is readily accessible to, and usable by, individuals with disabilities. Programmatic accessibility is necessary not only for individuals with needs related to mobility disabilities, but also to individuals with needs related to speech, cognitive, vision and hearing disabilities. The following are examples of elements that should be evaluated for barriers to accessibility:

#### 1.3.1 Physical Barriers

- Parking
- Path of travel to, throughout and between buildings and amenities
- Doors

- Sidewalks and/or curb ramps
- Service counters
- Restrooms
- Drinking fountains
- Path of travel along sidewalk corridors with the public rights-of-way
- Access to pedestrian equipment at signalized intersections

#### 1.3.2 Programmatic Barriers

- Building Signage
- Customer communication and interaction
- Emergency notification, alarms, and visible signals
- Participation opportunities for City sponsored events

#### 1.4 Ongoing Accessibility Improvements

City facilities, programs, services, policies, practices and procedures will continue to be evaluated on an ongoing basis, and the ADA Transition Plan should be revised to account for changes since the initial self-evaluation. An accessibility inventory of sidewalks and curb ramps on streets and near City facilities will be completed, and an approach will be put in place to remove all identified barriers. This Plan will be posted on the City's website at [www.cityofgroveok.gov](http://www.cityofgroveok.gov) for review and consideration by the general public.

#### 1.5 City of Grove's Approach

The purpose of the Transition Plan is to provide the framework for achieving equal access to the City of Grove's programs, services and activities within a reasonable timeframe. The City's elected officials and staff believe accommodating disabled persons is essential for good customer service, for the quality of life Grove residents seek to enjoy and for effective governance. This Plan has been prepared after careful study of all the City's programs, services and activities.

The City of Grove shall make reasonable modifications in policies, practices or procedures when they are necessary to avoid discrimination based on disability, unless the City can demonstrate that making the modification would fundamentally alter the nature of the service, program, or activity. The City of Grove will not place surcharges on individuals with disabilities to cover the cost involved in making programs accessible.

## **2.0 PUBLIC OUTREACH**

The City provided opportunities to receive input from the public concerning this Transition Plan. The following section details these conversations with the public.

### 2.1 Public Hearing

The City hosted a public hearing on August 7, 2018 at 6 p.m. to provide a summary of the Transition Plan and receive feedback on the Transition Planning process and any other concerns related to accessibility. A Notice of the Public Hearing along with a copy of the draft plan was placed on the city's website on May 23, 2018 to provide the public the opportunity to review the plan prior to the Public Hearing.

- Q. Are there any water access issues to get people with disabilities to the waters of Grand Lake? Does part of the Transition Plan enable someone in a vehicle to drive to the water to be loaded into a boat?

- A. Wolf Creek Park is the only city owned water access point. The parking area and at least one of the city owned docks is ADA compliant.
- Q. Was there a Transition Plan in place previously?
- A. Although, the City of Grove currently complies with ADA and PROWAG, this is a new written Plan that was started within the past twelve (12) months.
- Q. How is the City prioritizing issues?
- A. The severity of the issue as wells as public input. An ADA Grievance procedure has been in place for several years allowing public input regarding concerns.
- Q. Did the City sent out a survey to the residents?
- A. No, a survey is not a requirement of the Transition Plan process. However, the Plan was posted on the City's website for the public to make comments.
- Q. Was the website evaluated as part of this project?
- A. Yes, the website was evaluated and is currently compliant with ADA.
- Q. When is the Transition Plan going to be approved.
- A. The Plan will be presented to Council for their consideration to approve on August 21, 2018.
- Q. Who is going to pay for proposed changes?
- A. The changes will be paid for by the City of Grove when funds are available.
- Q. What is the difference between Title II and Title III?
- A. *Title II* entities such as the City of Grove are eligible to receive federal funds through grants and are required to have an ADA Transition Plan.  
*Title III* entities such as restaurants, gas stations, Lowes, Walmart are privately funded and are not required to have an ADA Transition Plan.
- Q. Are all intersections required to have sidewalks and curb ramps?
- A. No. However, once a sidewalk is constructed, it is required to be maintained in an accessible condition. Curb ramps are required where sidewalks cross a curb and curb ramps must be compliant.

### **3.0 DESIGNATE ADA COORDINATOR**

The City of Grove designates the employee holding the position of Building Inspector to serve as the ADA Coordinator. At the time the Transition Plan was approved the following individual was designated as the ADA Coordinator:

Calvin Igney, Building Inspector  
104 W. 3<sup>rd</sup> Street  
Grove, OK 74344  
Office Phone: 918-786-6107  
Fax Phone: 918-786-8939  
Cell Phone: 918-290-1975  
[cigney@cityofgroveok.gov](mailto:cigney@cityofgroveok.gov)

#### 4.0 SELF EVALUATION and SUMMARY OF FINDINGS

The City of Grove is committed to better meet the needs of employees and citizens with disabilities. The first step was to perform a Self-Evaluation and determine a Summary of Findings.

##### 4.1 Programs, Procedures and Policies

The City of Grove has established a process to better cover the needs of employees and citizens with disabilities. In addition to the City's ADA Coordinator, each department head will serve as an ADA Liaison who reports to the City's ADA Coordinator regarding the needs of their department and the programs which that department is responsible. The City's ADA Coordinator, or designee, will follow-up with each departmental ADA Liaison to coordinate the implantation of plans, programs, policies and procedures.

In those situations where a program, procedures or policy creates a barrier to accessibility that is unique to a department or certain program, the ADA Coordinator, or designee, will coordinate with the department head to address the removal of the barrier in the most reasonable and accommodating manner.

Services and programs offered by the City of Grove to the public must be accessible. Accessibility applies to all aspects of a program or service, including advertisement, orientation, eligibility, participation, testing or evaluation, physical access, provision of auxiliary aids, polices and communication.

The City is not required to take any action that it can demonstrate would result in a fundamental alteration of a program or activity, would create a hazardous condition for other people, or would represent an undue financial and administrative burden.

The City may achieve program accessibility by several methods:

- Structural methods such as altering an existing facility;
- Acquisition or redesign of equipment;
- Assignment of aides; and
- Providing services at alternate accessible sites.

When choosing a method of providing program access, the City should endeavor to give priority to the one that results in the most integrated setting appropriate to encourage interaction among all users, including individuals with disabilities. In compliance with the requirements of the ADA, the City provides equality opportunity but does no guarantee equality of results.

##### 4.1.1 Departmental Self-Evaluations

The self-evaluation of the City's services, programs and activities required and involved the participation of every City department. A self-evaluation regarding ADA compliance was performed by the following departments:

Administration/Council	Building Inspection/Code	Buildings & Grounds
E911	Finance	Fire Department
GMSA Warehouse	Police	Streets
Utility Office	Vehicle Maintenance	WTP/WWTP

The departmental self-evaluations were developed to acquire basic information on how a person with a disability would be able to participate in each program, service or activity offered by each department.

The self-evaluation included a review of the following information:

- Facility accessibility for visitors and employees;
- Communication procedures for audio/visual presentations;
- Public Notice, documents;
- Methods used to ensure that all public meetings are designed to accommodate persons with disabilities.

Self-Evaluation Findings: Upon review of the departmental self-evaluation forms, it was clear that several facilities are not compliant with ADA and modifications are needed.

Recommended Actions: It shall be the responsibility of each departmental ADA Coordinator Liaison to request necessary modifications, and develop a record keeping process of the modifications requested and the accommodation provided.

#### 4.1.2 Public Meetings

The City Council and other Authorities are responsible for holding public meetings including

Grove Convention & Tourism Bureau	Grove Economic Development Authority
Grove Planning & Zoning Commission	Grove Zoning Board of Adjustment
Grove Municipal Airport Managing Authority	Grove Municipal Service Authority

The facilities where these boards meet were examined to ensure meetings are held in an accessible location and determine the process for serving on a board to ensure people with disabilities have an equal opportunity to participate in civic life. The following information was gathered:

- How are meeting notices distributed?
- Do the meeting notices include information on how to request auxiliary aides?
- Where are the meetings held?
- If the facility accessible by people with disabilities?

#### Self-Evaluation Findings:

All boards, commissions and committees have a one-page online application on city's website [www.cityofgroveok.gov](http://www.cityofgroveok.gov) and a paper application form available at City Hall. The form requires basic personal information, such as name and address, and to what board, commission or committee they are applying for. No issues were identified with the application itself.

Public meetings are generally held in locations that are reasonable accessible to persons with mobility impairments. All public meeting notices and agendas include availability of accessibility modifications. Current agendas and notices state the following:

*The City of Grove is committed to the provision of equal access to government for all citizens. To this extent, any physically impaired person in need of accommodation in order to participate should contact the City Clerk at least twenty-four (24) hours in advance of the scheduled meeting so that appropriate arrangements can be made.*

#### Recommended Actions:

Recommendations for the Council, Boards, Commission, Committees and Trust Authorities:

- Schedule public meetings in accessible locations whenever possible. An accessible location should contain at least, but not limited to the following:
  - Accessible restrooms;
  - Wheelchair access;
  - Handicap parking;
  - Accessible route throughout out building;
  - Temperature control;
- When a fully accessible site is not available, then make reasonable modifications so than an individual with a disability can participate.
- Provide flexibility in the time limit on speaking for individuals with communication difficulties.

#### 4.1.3 Printed Information

To meet the ADA communication standards, the City of Grove departments must be able to provide information in alternative formats such as using easy-to-understand language, large-print format, audiotape or computer disc.

#### Self-Evaluation Findings:

Many City departments and offices produce printed information that is available to the public.

Most registration forms, permits, applications and waivers are available on-line and in written form. There is inconsistency as to the availability of alternate formats of documents such as large-print or audio tapes for individuals who are unable to read the materials.

#### Recommended Actions:

- Provide information to each City 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.
- Publicize the City's commitment to provide program information in alternative formats on an individual basis as requested, including large-print and audio.
- Ensure the uniformity of charges for all publication formats.
- Include the following notice on all materials printed by the City that are made available to the public: "This publication can be made available in alternative formulas such as large print and audio, by contacting the City Clerk, at 918-786-6107.
- Provide program, facility reservation information in a variety of formats upon request.
- Provide staff assistance upon request to assist in filling out forms, permits, applications, etc.
- Handle all requests for alternative formats or lengthy documents on an individual basis.

#### 4.1.4 Policies

The City's Personnel Policy and Procedures Manual was reviewed to ensure discriminatory language is not used and employees with disabilities have an equal opportunity at employment.

#### Self-Evaluation Findings:

The City's Personnel Policy and Procedures Manual includes the ADA Employment Reasonable Accommodations Policy. The policy directs questions and concerns to the ADA Coordinator, and provides a grievance procedure.

#### Recommended Actions:



In addition to the ADA Employment Reasonable Accommodations Policy, the City's Personnel Policy and Procedures Manual must include the ADA Grievance Form.

#### 4.1.5 City Building Codes

City Buildings Codes were reviewed to ensure there is no discriminatory language and to ensure there are no codes that could be interpreted as discriminatory. The City of Grove has officially adopted the PROWAG guidelines as their standard for the public rights-of-way. Additionally, they use the most current and any amendments thereto made following Building Codes:

- ICC International Building Code (IBC)
- ICC International Fire Code (IFC)
- ADA Accessibility Guidelines
- ANSI American National Standards
- ICC International Residential Code (IRC)
- ICC International Plumbing Code (IPC)
- ICC International Fuel Gas Code
- ICC International Mechanical Code (IMC)
- NEC National Electric Code (NEC)

City Ordinances were reviewed to ensure there is no discriminatory language and to ensure there are no Ordinances that could be interpreted as discriminatory. The following chapters of the City Code were evaluated during this process:

- Part 5: Building Regulations and Codes
- Part 13: Public Safety

#### Self-Evaluation Findings

The City Codes did not provide for any discriminatory language.

The Ordinances reviewed did not indicate the responsibility of the City to make reasonable accommodations for individuals with disabilities to serve as Council Members, Board Member or Commissions.

#### Recommended Actions

Both new and current City Code should be evaluated and reviewed to ensure accommodations are being made for individuals with disabilities.

#### 4.1.6 Design Standards Review

The following design standards were reviewed for consistency with the most current ADA Standards and the Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG).

#### Self-Evaluation Findings

Numerous sidewalks throughout the city are non-compliant with ADA Standards. In 2018, the City adopted the PROWAG Guidelines.

#### Recommended Actions:

Construct all new sidewalks and facilities to comply with the ADA Standards and PROWAG.

#### 4.1.7 Exceptions and Exemptions under the ADA

As a Title II entity, the City must operate each service, program or activity so that the service, program or activity when viewed in its entirety, is readily accessible to and usable by individuals with disabilities. The City is not necessarily required to make each of its existing facilities accessible and usable by individuals with disabilities. The City is not required to take any action that would threaten or destroy the historic significance of a historic property or take any action that would result in a fundamental alteration of the nature of the service, program or activity or create any undue financial and administrative burden,

In the event that the City believes that any proposed action would fundamentally alter the service, program or activity or generate undue financial or administrative burden, the City has the responsibility of providing proof of such. The City must however, take any other action that would ensure that individuals with disabilities receive the benefits or services provided by the City.

In lieu of structural changes to existing facilities, other methods that are effective in achieving compliance may be used. There may include acquisition of equipment or reassignment of services to accessible facilities. In regard to historic properties alternative methods for compliance may include audio-visual materials and devices or assigning person to guide and assist those with disabilities.

#### 4.2 Facilities Review

In 2018, the City of Grove conducted a comprehensive evaluation of architectural barriers in city owned facilities. The evaluation included a mix of different facility types and provided an overview of the architectural barriers that prevent people with disabilities from using its facilities and participating in its programs.

The infrastructure and facility evaluation process were accomplished by employees performing hands-on inspections. The evaluation process identified physical barriers in city owned facilities based on the most recent edition and any amendments thereto made to the ADA Standards and the PROWAG.

The following facilities were evaluated:

- Buildings
- Parks
- Signalized Intersection
- Sidewalks

The evaluation process identified the compliance status of each facility and infrastructure status regarding the federal standards and include the following:

- Facilities compliance with ADA standards;
- Facilities non-compliance with ADA standards;
- Recommended actions to resolve non-compliance;
- Prioritization of improvements;
- Cost estimates and time frame to resolve non-compliance

##### 4.2.1 Buildings

A total of seven (7) buildings were evaluated. In addition to the buildings, the associated parking lots serving the buildings were also evaluated.

### Self-Evaluation Findings

Areas that were evaluated for each building including parking lots, path of travel from the parking lot to the building, access into the building, signage, drinking fountains, restrooms and counter heights.

The following issues were discovered during the evaluation process:

- Community Center/City Hall – General Public has access to this facility
  - Entrance from the lobby to utility office area is not ADA compliant
  - Employee restroom is not ADA compliant
  - Employee breakroom/kitchen is not ADA compliant
  
- Fire Department – General Public does not have access to this facility
  - Employee entry doors are not ADA compliant
  - Employee restroom is not ADA compliant
  
- GMSA Warehouse – General Public does not have access to this facility
  - Parking lot and path of travel to the building are not ADA compliant
  - Employee entry doors are not ADA compliant
  - Employee Restroom is not ADA compliant
  
- Police Department – General Public has access to front entrance of this facility
  - Front Entrance is not ADA compliant
  - Lobby Entrance is not ADA compliant
  - Employee restrooms are not ADA compliant
  - Employee Back Entrance is not ADA compliant
  
- Senior Citizens Center – General Public has access to this facility
  - Entry doors are not ADA compliant
  
- Street Department – General Public does not have access to this facility
  - Parking lot and path of travel to the building are not ADA compliant
  - Employee entry doors are not ADA compliant
  - Employee restroom is not ADA compliant
  
- Vehicle Maintenance Facility – General Public does not have access to this facility
  - Parking lot and path of travel to the building are not ADA compliant
  - Employee entry doors are not ADA compliant
  - Overhead door is not ADA accessible
  - Employee restroom is not ADA compliant

### Recommended Actions

The City of Grove created a line item in the 2018-2019 Capital Fund Budget to make reasonable ADA modifications to existing facilities. The funding in the line item will be dependent on the availability of annual budget funds.

The City of Grove is committed to complying with ADA standards when constructing any new facilities including buildings, sidewalks and parks.

- Community Center/City Hall – General Public has access to this facility  
*Future Budget Funding*

- Install an ADA compliant push-button automatic door opener to the existing door going from the reception area to the office area - \$5,000
- Improvements to be made on an as needed basis to accommodate employees with disabilities*
  - Install an ADA compliant push-button automatic door opener to the existing door located outside the Building Inspector's office to provide accessibility for employees with disabilities to the ADA compliant restrooms - \$5,000
  - Remodel the employee break-room to provide accessibility to the kitchen sink for employees with disabilities - \$5,000
- Fire Department – General Public does not have access to this facility
  - Improvements to be made on an as needed basis to accommodate employees with disabilities*
    - Install railing around entrance ramp - \$2,000
    - Replace existing restroom door with ADA complaint door with push-button access and install grab bars to restroom - \$27,000
- GMSA Warehouse – General Public does not have access to this facility
  - Improvements to be made on an as needed basis to accommodate employees with disabilities*
    - Construct ADA compliant path of travel from the parking lot to the building - \$5,000
    - Replace existing entry door with ADA compliant door - \$25,000
    - Remodel employee restrooms to meet ADA compliance - \$20,000
- Police Department – General Public has access to the front entrance of this facility
  - Future Budget Funding*
    - Install an ADA compliant push-button automatic door opener to the existing main entrance door - \$5,000
    - Install an ADA compliant push-bottom automatic door opener to the existing lobby entrance door - \$5,000
  - Improvements to be made on an as needed basis to accommodate employees with disabilities*
    - Remodel existing employee restrooms – enlarge stall areas and add railing - \$5,000
    - Replace existing back door with an ADA compliant door with push-button automatic door opener - \$5,000
    - Remodel back door entrance by constructing an ADA compliant ramp - \$6,000
- Senior Citizens Center – General Public has access to this facility
  - 2018-19 Budget
    - Install an ADA complaint push-button automatic door opener to the North side entrance - \$5,000
  - Future Budget Funding
    - Install an ADA complaint push-button automatic door opener to the South side entrance - \$5,000
- Street Department – General Public does not have access to this facility
  - Improvements to be made on an as needed basis to accommodate employees with disabilities*
    - Construct ADA compliant path of travel from the parking lot to the building - \$5,000
    - Install key pad with automatic door opener to existing overhead door and construct ADA compliant ramp to provide accessibility into the building
    - Remodel employee restrooms to meet ADA compliance - \$20,000

- Vehicle Maintenance Facility – General Public does not have access to this facility  
*Improvements to be made on an as needed basis to accommodate employees with disabilities*
  - Construct ADA compliant path of travel from the parking lot to the overhead door entrance - \$5,000
  - Install keypad for automatic door opening to the overhead door - \$5,000
  - Remodel employee restrooms to meet ADA compliance - \$20,000

#### 4.2.2 Parks

A total of four (4) park locations were evaluated as part of this project.

##### Self-Evaluation Findings

Areas that were evaluated for each park included parking lots, path of travel from the parking lot to the park amenities, access into facilities, signage, restrooms and sink/counter heights.

The following common issues were observed at the parks:

Many of the park amenities, such as picnic areas and playgrounds, were not accessible or located along accessible paths.

- Rotary Park
  - Restroom doors and stalls are not ADA compliant
- Sports & Rec Complex
  - Soccer – Restrooms and Concession area are not ADA compliant
  - Softball – Restrooms and Concession area are not ADA compliant
- Veteran’s Park
  - Restroom doors are not ADA compliant
- Wolf Creek Park
  - Restroom doors are not ADA compliant

##### Recommended Actions

The City of Grove will make ADA accommodations to the following parks as budget funds become available.

- Rotary Park \$30,000
  - Install new partitions and railing in restrooms
  - Construct new restroom and install ADA compliant push-button automatic door opener
- Sports and Recreational Complex \$50,000
  - Remodel Soccer and Softball Complex including ADA compliant restrooms and concession area
- Veteran’s Park
  - Install One-Bay Wheelchair Swing Set \$ 2,500
  - Install ADA compliant push-button automatic door openers on two (2) restroom doors \$ 10,000
- Wolf Creek Park \$20,000
  - Install ADA compliant push-button automatic door openers on four (4) restroom doors

#### 4.2.3 Signalized Intersections

A total of eight (8) signalized intersections are located within the City of Grove. Six (6) of the signalized intersections are located along U.S. Highway 59, one (1) is located along OK State Highway 10 and one (1) is located on a city owned street.

### Self-Evaluation Findings

Seven (7) signalized intersections are in the jurisdiction of the Oklahoma Department of Transportation (ODOT) are listed below:

- Leisure Lane/US Highway 59
  - No Pedestrian crossings
- 3<sup>rd</sup> Street/US Highway 59
  - ADA compliant pedestrian crossing ramps and push-buttons
- 7<sup>th</sup> Street/US Highway 59
  - Pedestrian crosswalks – no ramps or push-buttons
- 13<sup>th</sup> Street/US Highway 59
  - Pedestrian crosswalks – no ramps or push-buttons
- 18<sup>th</sup> Street/US Highway 59
  - ADA compliant pedestrian crossing ramps and push-buttons
- State Park Road/US Highway 59
  - Pedestrian crosswalks – no ramps or push-buttons
- Shundi Road/OK State Highway 10
  - No Pedestrian crossings

One (1) flashing signal is located within the City of Grove's jurisdiction

- Leisure Lane/13<sup>th</sup> Street
  - North/South bound traffic required to stop
  - East/West cross traffic not required to stop
  - No pedestrian crossings

### Recommended Action

The City of Grove is making application for the Safe Routes to School grant, and if funded two signalized push-button pedestrian crosswalks will be installed near the Elementary School Complex.

#### 4.2.4 Sidewalks

The City of Grove is lacking on the number of sidewalks and the conditions of existing sidewalks within the community.

### Self-Evaluation Findings

It is estimated that eighty-five percent (85%) of existing sidewalks need repairs or total replacement.

### Recommended Actions

- |  | <u>Future Budget Funding</u> |
|--|------------------------------|
| ➤ Replace the following sidewalks:                                   |                              |
| ○ Broadway Street – between 4 <sup>th</sup> & 7 <sup>th</sup> Street | \$26,345                     |
| ○ Grand Street – between 4 <sup>th</sup> & 11 <sup>th</sup> Street   | \$71,600                     |
| ○ Center Street – between 7 <sup>th</sup> & 10 <sup>th</sup> Street  | \$ 8,950                     |
| ○ 7 <sup>th</sup> Street – between Center & Main Street              | \$35,000                     |
| ➤ Replace & Add Sidewalks to the following locations:                |                              |
| ○ 10 <sup>th</sup> Street – between Main & Leisure Lane              | \$73,135                     |
| ○ Leisure Lane – 7 <sup>th</sup> Street to 10 <sup>th</sup> Street   | \$ 8,950                     |
| ➤ Construct new sidewalks to the following locations:                |                              |
| ○ Center Street – 3 <sup>rd</sup> Street to 7 <sup>th</sup> Street   | \$27,447                     |

- 7<sup>th</sup> Street – between Leisure Lane & Center Street \$40,625
  - 3<sup>rd</sup> Street – between Center Street & Spring Street \$ 8,735
- Construct and repair eighty-five percent (85%) of sidewalks \$1,000,000+

#### 4.3 Maintenance versus Alterations

The United States Department of Justice (DOJ) has issued a briefing memorandum on a clarification of maintenance versus projects. Information contained in the briefing memorandum is below. The City of Grove recommends this clarification be disseminated to the appropriate staff when a curb ramp installation is required as part of a project.

*The Americans with Disabilities Act of 1990 (ADA) is a civil rights statute prohibiting discrimination against persons with disabilities in all aspects of life, including transportation, based on regulations promulgated by the DOJ.*

*DOJ's regulations require accessible planning, design, and construction to integrate people with disabilities into mainstream society. Further, these laws require that public entities responsible for operating and maintain the public rights-of-way do not discriminate in their programs and activities against persons with disabilities. Federal Highway Administration (FHWA) ADA program implements the DOJ regulations through delegated authority to ensure that pedestrians with disabilities have the opportunity to use the transportation system's pedestrian facilities in an accessible and safe manner*

*FHWA and DOJ met in March 2012 and March 2013 to clarify guidance on the ADA's requirements for constructing curb ramps on resurfacing projects. Projects deemed to be alterations must include curb ramps within the scope of the project.*

*This clarification provides a single Federal policy that identifies specific asphalt and concrete pavement repair treatments that are considered to be alterations – requiring installation of curb ramps within the scope of the project – and those that are considered to be maintenance, which do not require curb ramps at the time of the improvements. Following is a summary of projects that fall within maintenance versus alterations.*

##### ADA Maintenance

Crack Filling & Sealing  
Surface Sealing  
Chip Seals  
Slurry Seals  
Fog Seals  
Scrub Sealing  
Joint Crack Seals  
Dowel Bar Retrofit  
Spot High-Friction Treatments  
Diamond Cutting  
Pavement Patching

##### ADA Alterations

Open-graded Surface Course  
Cape Seals  
Mill & Fill/Mill & Overlay  
Hot In-Place Recycling  
Micro-surfacing/Thin Lift Overlay  
Addition of new layer of Asphalt  
Asphalt and Concrete Rehabilitation  
Asphalt and Concrete Reconstruction  
New Construction

*This approach clearly identifies the types of structural treatments that both DOJ and FHWA agree required curb ramps (when there is a pedestrian walkway with a prepared surface for pedestrian use and a curb, elevation, or other barrier between the street and walkway) and furthers the goal of the ADA to provided increased accessibility to the public right-of-way for persons with disabilities. This single Federal policy will provide for increased consistency and improved enforcement.*

#### 4.4 Closing Pedestrian Crossings

Following is the written policy of the City of Grove on when and how to close a pedestrian crossing. If an engineering study determines a pedestrian crossing is not safe for any user, the crossing should be closed by doing the following:

- A physical barrier is required to close a crossing at an intersection. A strip of grass between the sidewalk and the curb IS acceptable as a physical barrier.
- Signage should be installed to communicate the closure.

#### 4.5 Prioritization

The following section identifies Factors to prioritize needed improvements to city owned facilities. The City of Grove does not have jurisdiction to make improvements to signalized intersections located on Oklahoma Department of Transportation roads or Transit Stops, therefore, no prioritization criteria was established.

##### 4.5.1 Prioritization Factors for City Owned Facilities

Buildings and Parks were prioritized on a 3-point scale as determined by City of Grove staff, particularly Department Heads responsible for the operations of the facility.

<u>Priority</u>	<u>Criteria</u>
High	<ul style="list-style-type: none"> <li>Facilities known to be used primarily by senior citizens or individuals with disabilities</li> <li>Non-compliant parking</li> <li>No accessible route from parking to building or park</li> <li>Non-compliant doors (entrance and restrooms)</li> <li>Non-compliant restrooms (public and employee)</li> <li>Dangerous steep slopes</li> <li>Obvious safety hazards/liabilities</li> <li>Complaints have been filed</li> </ul>
Medium	<ul style="list-style-type: none"> <li>Non-compliant drinking fountains</li> <li>Non-compliant counter heights</li> <li>Existing structures out of compliance</li> <li>Alterations made that do not comply</li> </ul>
Low	<ul style="list-style-type: none"> <li>Facilities that are primarily used by individuals other than senior citizens and individuals that do not have disabilities</li> </ul>

##### 4.5.2 Prioritization Factors for Sidewalk Corridors

Sidewalks were prioritized on a 3-point scale as determined by City of Grove staff, particularly the Street Department. Priority will be given to repairing and constructing sidewalks located within a close proximity to schools and daycares, and in high pedestrian traffic areas.

<u>Priority</u>	<u>Criteria</u>
High	<ul style="list-style-type: none"> <li>Repairing sidewalks with trip hazards</li> <li>Constructing new sidewalks to connect to existing ones</li> </ul>
Medium	<ul style="list-style-type: none"> <li>Repairing sidewalks that are cracked</li> </ul>
Low	<ul style="list-style-type: none"> <li>Repair or construction of sidewalks in low pedestrian traffic areas.</li> </ul>



## 5.0 IMPLEMENTATION

The City of Grove either completed or is currently working on several projects to help improve accessibility throughout the city.

Completed – 2005 to 2017

- Constructed a 10' wide asphalt trail along 18<sup>th</sup> Street – Shundi to 9<sup>th</sup> Street – provides safe pedestrian access to the hospital, Business Park and post office.
- Constructed ADA compliant sidewalks and curb ramps in the downtown area:
  - 3<sup>rd</sup> Street – Broadway to Main
  - 3<sup>rd</sup> Street – Main to O'Daniel
  - 3<sup>rd</sup> Street – Grand to alley way
- Constructed ADA compliant sidewalks from neighborhood to Elementary School Complex
  - From Broadway along 7<sup>th</sup> and 10<sup>th</sup> Street
- Constructed ADA compliant sidewalks with curb ramps on both sides along Highway 59S
  - Elm Creek Branch to Honey Creek Bridge
  - Both sides of Honey Creek Bridge to end of the city limits
- Constructed ADA compliant sidewalks with curb ramps on both side along Highway 59N
  - Beginning at 21<sup>st</sup> Street to Sailboat Bridge
  - Both sides of Sailboat Bridge to end of the city limits

Sidewalks are 11' wide some with 2" brick paver boarders, ramps are a minimum of 5' wide and some are 12' wide. All sidewalks are approved by ODOT as meeting ADA requirements.

- Installed two sets of ADA compliant doors with push-button automatic door openers on the South side of City Hall.
- Website Content Accessibility Guidelines (WCAG) 2.0 Upgrade
  - Test performed using Total Validator testing program
  - HTML accessibility errors were fixed
  - Missing Image Alt tags were added and are now required for all images uploaded
  - Implemented improvement to the way tables are viewed on mobile devices

Currently working Projects- 2018

- Additional Website Accessibility Improvements
  - Update Emergency Alerts Features
  - Color Contract Testing to ensure compliance
  - Evaluate inner pages such as website calendar, job openings, bids/rfps, etc. to detect and fix underlying issues
  - Continuous, ongoing improvement to proactively improve our solution as website accessibility techniques continue to evolve
- Re-constructing the parking lot on the South side of City Hall creating a safe ADA compliant path from the parking lot to the building with designated and identified ADA parking spaces.

Potential Projects – 2018-19

- Installation of a One-Bay Wheelchair Swing Set in Veteran's Park.

The City of Grove is prepared to submit a Safe Routes to School grant application to ODOT for the following project:

- Construct sidewalks in compliance with the Public Rights-of-Way Accessibility Guidelines (PROWAG). Install two accessible pedestrian crosswalks with push-button signals.
  - Width of sidewalk: Six feet (6')
  - Length of sidewalk: Approximately twenty-four hundred feet (2,400')
  - Sidewalk material: Concrete per ODOT standards

The proposed project approximate funding is as follows:

Total Project: \$305,810	Federal Funding: \$244,648	City of Grove Funding: \$61,162
100%	80%	20%

## 6.0 FUNDING OPPORTUNITIES

Alternative funding sources are available to the City to address the issues identified in this Transition Plan.

### 6.1 Federal and State Funding

The City of Grove is a member of Grand Gateway Economic Development Authority which assists with making application to various resources on behalf of the City to fund ADA compliance improvements.

The majority of these programs are competitive type grants; therefore the City of Grove is not guaranteed to receive these funds.

- TAP – Transportation Alternatives Program
- RTP – Recreational Trails Program
- SRTS – Safe Routes to Schools
- CDBG – Community Development Block Grants

### 6.2 Local Funding

Funding options for the City include

- Allocations of General Fund (sales tax)
- Allocations of Capital Fund (sales tax)

### 6.3 Private Funding

Private funding may include local and national foundations, endowments, private development and private individuals. The City requires private developers to improve pedestrian facilities to current ADA requirements, whether it is new development or re-development of an existing property.

## 7.0 CONCLUSION

This document serves as the Americans with Disabilities Act (ADA) Transition Plan within the City of Grove. In developing this Plan, program, policies and procedures were reviewed for compliance with ADA guidelines and a self-evaluation was conducted on the following facilities:

- 7 Buildings
- 4 Parks
- 7 Signalized Intersections
- Sidewalks throughout the city limits

The City of Grove will continue to identify and remedy ADA barriers in an effort to ensure that the disabled residents of Grove are given access to the City's programs, services and activities.

In an effort to fund much needed improvements, the city added an ADA Compliance line-item to its annual budget. ADA improvements identified in this Transition Plan are on-going and will continue to be addressed as budget funds are available.