

ADA TRANSITION PLAN UPDATE

Montana Department of Transportation



NOVEMBER 30, 2021

Providing equitable access for all transportation users





Prepared for:
Montana Department of Transportation



Prepared by:
Robert Peccia and Associates

FROM THE DIRECTOR



Malcolm "Mack" Long, Director
Montana Department of Transportation

November 30, 2021

The Montana Department of Transportation (MDT) is committed to building the safest and most resilient transportation system for all users. With this update to the *Americans with Disabilities Act (ADA) Transition Plan*, MDT continues to demonstrate our commitment to this effort. Since the previous plan was published in 2016, MDT has collected additional accessibility data, implemented projects involving accessibility improvements, and developed new statewide plans that complement and influence the ADA program.

In the last five years, I am proud to share that MDT has funded multiple stand-alone ADA upgrade projects, which have provided 1,546 ADA-compliant curb ramps and over 7,000 linear feet of new sidewalk across 19 Montana communities. As part of larger highway improvement projects, MDT has provided an additional 1,544 ADA-compliant curb ramps, 435 accessible pedestrian signals, and nearly 220,000 linear feet of new sidewalk within 31 communities. These improvements help make Montana's transportation system safer and more accessible to all users.

Building on this momentum, this updated plan documents the changes MDT has made to the program since 2016, outlines improved processes, and summarizes progress made in removing barriers to accessibility. The updated plan also includes a new section compiling ADA resources relating to the planning, design, implementation, and maintenance of ADA-accessible features and guidelines for accommodating all individuals in the public involvement process. Additionally of note for this plan, MDT has incorporated an updated curb ramp scoring process to better communicate identified barriers and assist MDT and local governments in development of projects involving barrier removal. Lastly, the plan incorporates MDT's commitment to holistically eliminate barriers within the limits of stand-alone ADA projects including any barriers between intersections to improve mobility and connectivity for all users.

Successful implementation of this plan will require ongoing coordination with local agencies, the public, and stakeholders. MDT is committed to working collaboratively with communities throughout the state to realize our common goal of an accessible, safe, efficient, and sustainable transportation system that serves all users.

On behalf of MDT and the diverse traveling public the department serves, I present the 2021 update of the *ADA Transition Plan*.

A handwritten signature in blue ink that reads "Malcolm D. Long". The signature is fluid and cursive, with the first name being the most prominent.

Malcolm D. Long, Director
Montana Department of Transportation



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ACRONYMS AND ABBREVIATIONS

AADT	Annual Average Daily Traffic
ADA	Americans with Disabilities Act
ADAAG	ADA Accessibility Guidelines
APS	Accessible Pedestrian Signals
CFR	Code of Federal Regulations
CMAQ	Congestion Mitigation and Air Quality
DOJ	United States Department of Justice
DWD	Detectable Warning Devices
EPM	Construction Engineering Project Managers
FHWA	Federal Highway Administration
MCS	Motor Carrier Services
MDT	Montana Department of Transportation
MOU	Memorandum of Understanding
MPO	Metropolitan Planning Organization
MUTCD	Manual on Uniform Traffic Control Devices
PHB	Pedestrian Hybrid Beacon
PROWAG	Public Rights-of-Way Accessibility Guidelines
Px3	MDT's Performance Programming Process
RDM	MDT Road Design Manual
SME	Subject Matter Experts
STIP	Statewide Transportation Improvement Program
TA	Transportation Alternatives

ACKNOWLEDGMENTS

The following people provided guidance and support throughout the course of the plan update.

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The Advisory Committee (AC) provided plan oversight and reviewed deliverables. The AC included representatives from the Montana Department of Transportation (MDT), Federal Highway Administration (FHWA), and representatives from the disability community.

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ADA TRANSITION
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CHAPTER 1: INTRODUCTION

The Montana Department of Transportation (MDT) *Americans with Disabilities Act (ADA) Transition Plan* directs the department's efforts to provide an accessible transportation system within the state of Montana. The purpose of the plan is to provide guidance for removal of barriers to enable equitable access to MDT's programs, facilities, and services for transportation users of all abilities. The plan provides an overview of MDT's external ADA program, outlines MDT's mission and ADA policy, and identifies methods to assist MDT in complying with ADA regulations. The plan is intended to be a living document to reflect the current MDT ADA program and compliance status. **The MDT Director is responsible for implementing the plan.** Attachments to the plan outline accomplishments to date and future actions necessary to enable ADA compliance.



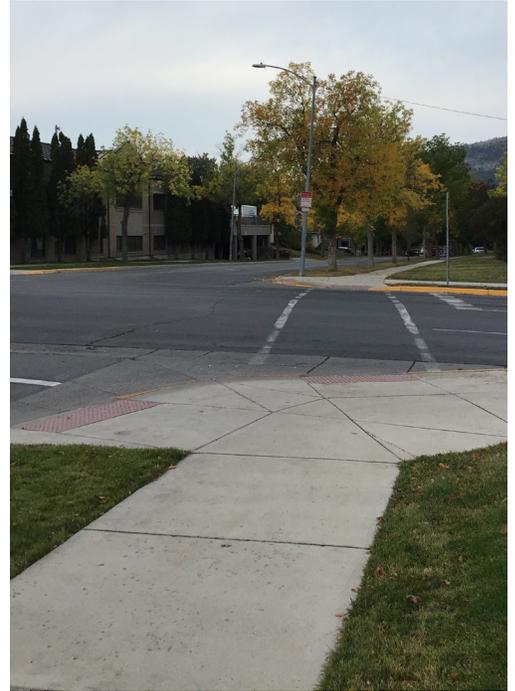


1.1. MDT MISSION AND ADA POLICY STATEMENT

The MDT guiding mission is to serve the public by providing a transportation system and services that emphasize quality, safety, cost effectiveness, economic vitality, and sensitivity to the environment.

In fulfilling its mission, MDT recognizes the importance of providing equitable access to all transportation system users, including those with impairments affecting mobility. Accessible building facilities and right-of-way features provide critical access to employment, health care, education, and government services. Equitable access for people with disabilities facilitates independence and self-sufficiency, quality of life, participation in the work force, and meaningful social and economic contributions to society. The MDT *ADA Transition Plan* is an important step in helping MDT eliminate barriers and provide equitable opportunities for disabled individuals to use MDT programs, right-of-way features, and building facilities based on their specific needs.

In accordance with 28 CFR 35.130, it is MDT policy that no qualified person with a disability shall, solely by reason of disability, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity that receives federal financial assistance administered by the United States Department of Transportation.



1.2. REGULATORY FRAMEWORK

Section 504 of the Rehabilitation Act of 1973¹

Section 504 of the Rehabilitation Act of 1973 prohibits discrimination on the basis of disability by any program or activity receiving federal financial assistance. Discrimination may consist of exclusion from participation in or denial of the benefits of programs and activities operated by a department, agency, or other instrumentality of state or local government. Section 504 applies to MDT, as well as all sub-recipients of federal funds.

Title II of the Americans with Disabilities Act of 1990²

The Americans with Disabilities Act of 1990 expands on the foundation laid by Section 504 by prohibiting discrimination on the basis of disability by public entities regardless of whether they receive federal financial assistance. The Act is divided into five titles describing requirements relating to (I) employment, (II) state and local government services, (III) public accommodations, (IV) telecommunications, and (V) miscellaneous provisions. Title II of the Act applies specifically to state and local government services and the programs and activities they administer, including features built before and after 1990. Titles I, III, IV, and V are not addressed further in the MDT *ADA Transition Plan*.

ADA Implementing Regulations³

The Code of Federal Regulations (CFR) outlines regulations implementing Title II of the ADA, which apply to MDT as a department of Montana state government. **Appendix A** summarizes relevant MDT responsibilities under Title II of the ADA as implemented by the United States Department of Justice (DOJ).

Public entities employing 50 or more persons must develop a document called a transition plan outlining the steps necessary to complete any structural changes (i.e., changes to physical assets) to achieve program compliance.

At a minimum, the plan must meet the requirements stated in 28 CFR 35.150(d)(3) as follows.

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

As part of the transition plan, public entities responsible for streets, roads, or walkways must include a schedule for providing curb ramps or other sloped areas where pedestrian walks cross curbs, giving priority to walkways serving state and local government offices and facilities, transportation, places of public accommodation, and employers, followed by walkways serving other areas (28 CFR 35.150(d)(2)).

The MDT *ADA Transition Plan* addresses requirements relating to physical assets, including facilities within MDT right-of-way. For the purposes of this plan, facilities are defined to include district and headquarters office buildings, rest areas, airports, maintenance buildings, and motor carrier services (MCS) scale sites. Right-of-way features include elements such as curb ramps, sidewalks, crosswalks, median crossings, and pedestrian activated signal systems. In addition to these requirements, the MDT *ADA Transition Plan* addresses other elements outlined in Title II of the ADA related to administration, communications, and maintenance.

Public entities must provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the development of the transition plan by submitting comments. A copy of the transition plan must be made available for public inspection (28 CFR 35.150(d) (1)). Public participation and document availability are discussed in more detail in **Chapter 2**.

In addition to regulations implemented by the United States Department of Justice, the United States Department of Transportation prohibits discrimination against qualified persons with disabilities, and requires federal-aid recipients to make reasonable accommodations in policies, practices, or procedures when necessary to avoid discrimination on the basis of disability unless the accommodations would fundamentally alter the nature of the service, program, or activity or result in an undue financial and administrative burden (49 CFR 27.7).

MDT must ensure all of its programs, services, and activities are accessible to and usable by individuals with disabilities. MDT's external ADA program ensures that people with disabilities have equitable opportunities to use the public right-of-way system. This program is responsible for implementing MDT's *ADA Transition Plan*, which guides MDT's efforts to provide an accessible transportation system in Montana.





1.3. RELATED PLANS AND DOCUMENTS

MDT has developed a range of statewide plans, operations manuals, design standards and criteria, and communications guidelines that complement and influence the *ADA Transition Plan*. The following documents provide information pertaining to the planning, design, implementation, and maintenance of ADA-accessible features and guidelines for accommodating all individuals in the public involvement process.

Montana Traffic Engineering Manual (2009)⁴

The *Montana Traffic Engineering Manual* provides uniform traffic engineering practices for MDT and consultant personnel when preparing plans for MDT projects. The manual provides limited guidance on ADA accessible traffic control and defers to the *Manual on Uniform Traffic Control Devices* (MUTCD), which provides additional accessibility information. The manual provides guidance on standard signing including requirements for readability and standard placement to ensure signs do not obstruct the path of pedestrians. The manual also lists advantages and disadvantages of pedestrian signals and notes that, when used, pedestrian push buttons should be placed so they are convenient to use, reachable by the disabled, and not placed in the direct path for the blind as per ADA requirements. Chapter 31 of the manual describes special design elements including requirements for accessible on-street and off-street parking accommodations.

Maintenance Operations and Procedures Manual (2009)⁵

The MDT *Maintenance Operations and Procedures Manual* outlines guidance for providing consistency in maintenance duties and reporting activities. The manual includes standard methods and best practices for both preventative and reactive maintenance activities. The manual provides guidance for maintenance of MDT buildings, sites, and rest areas including snow removal, sign maintenance, and other safety considerations, although specific ADA accommodations are not detailed. The chapter on winter maintenance provides limited information about pedestrian facilities but recommends that when plowing where there is a curb, gutter and sidewalk, plowing to the right should be performed carefully so that snow is not stacked on the sidewalk. Depending on anticipated accumulation, it is also recommended that snow be plowed to the center of the street for later removal.



Design Memos (2010-2016)⁶

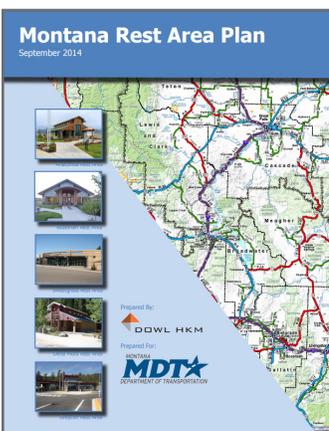
The following design memos issued by MDT provide clarification or additional guidance on roadway design elements related to ADA accommodations and accessibility.

- **Public Rights-of-Way Accessibility Guidelines (November 19, 2010):** MDT has adopted the *United States Access Board Public Rights-of-Way Accessibility Guidelines* (PROWAG) as the official accessibility manual, replacing the *ADA Accessibility Guidelines* (ADAAG).
- **EPM/Design Meeting Minutes (February 10, 2012):** Summary of topics discussed at a Construction Engineering Project Managers (EPM) meeting including:
 - amount of design detail needed in plans for sidewalks and ADA ramps;
 - properly addressing ADA issues during the Preliminary Field Review;
 - training needed for design and construction of ADA curb ramps and associated items including work zone ADA requirements;
 - sidewalk transition and removal of existing sidewalk panels; and
 - other issues related to design.

- **Detectable Warning Devices (June 16, 2014):** Cast iron detectable warning devices will be used for all installations. Type 2 installations require the removal of existing concrete and placement of new concrete to set the device. [Superseded]
- **Detectable Warning Devices (August 3, 2016):** Type 2 Detectable Warning Devices will no longer be installed on MDT projects and Type 1 devices should be included on both new construction and retrofit existing curb ramps.



Montana Rest Area Plan (2014)⁷



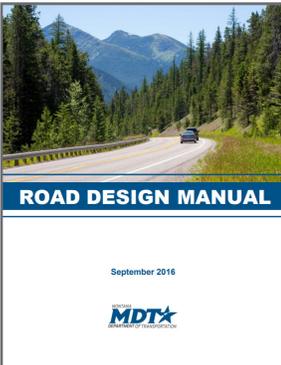
The *Montana Rest Area Plan* represents MDT's comprehensive statewide vision for the MDT Rest Area Program in the context of challenges such as aging infrastructure, high rest area demand and visibility, and limited funding. MDT recognizes the value of rest areas and the role they play in combating drowsy and distracted driving, providing shelter during weather events and road closures, and supporting the tourism and trucking industries. The MDT Statewide Rest Area Prioritization Plan Committee meets regularly to discuss and advance the progress and priority of rest area projects and topics that affect rest area strategy, including the public experience and regulation. Rehabilitation, reconstruction, and new construction projects at rest areas are identified based on health index scoring, network evaluation results, program tradeoffs and risks, and input from the Committee and MDT Districts. Additionally, the determination of overall need at rest areas and truck parking areas considers the compliance status of exterior and interior ADA features such as picnic areas, benches, parking stalls, curb ramps,

sidewalks, pedestrian ramps, protruding objects, doorways, drinking fountains, sinks, and water closets according to ADA compliance criteria summarized in Appendix B of the plan. The plan defines the following guidelines relating to accessibility.

- **Guideline 1:** Conduct regular site evaluations of state-maintained rest areas to assess adequacy and availability of services.
- **Guideline 7:** Design parking area configurations in accordance with applicable MDT design standards, where practicable, to enhance circulation, access, and safety for vehicles and pedestrians.
 - For new rest areas and existing rest areas, parking design will emphasize safety and accessibility for pedestrians and vehicles. Sites will comply with the ADA, including the appropriate number, type, and location of designated parking stalls and other building and site features.
- **Guideline 9:** Use site-specific usage data, where available, and consider site-specific conditions to identify the appropriate number and configuration of restroom stalls.
 - For all configurations, interior building features will comply with ADAAG and PROWAG.
- **Guideline 10:** Provide appropriate building and site features to promote patron safety and accessibility.
 - ADA components will be installed, including interior and exterior building features. Pedestrian routes will comply with ADAAG and PROWAG and provide access to the rest area building and features throughout the site.
 - Signage should comply with the MUTCD, ADAAG, and PROWAG to inform and guide patrons.
- **Guideline 19:** Maintain parking lots and entrance/exit ramps in safe and functional condition.



Road Design Manual and Geometric Design Standards (2016)⁸



The MDT *Road Design Manual* (RDM) was developed to provide uniform design practices for MDT design teams and consultant personnel preparing contract plans for projects involving MDT facilities. The RDM presents most of the information typically required throughout the course of a roadway design project. However, designers are encouraged to consider and use additional information and guidance from other national publications including the *2010 Americans with Disabilities Act Standards for Accessible Design* and PROWAG as appropriate. The RDM includes general guidance and design considerations for pedestrian elements including accessible sidewalks, parking, pedestrian signals, and pedestrian crossings (at-grade and grade-separated). The RDM stresses the importance of providing accessible pedestrian routes with all design projects, including providing accessible detours during construction.

The RDM outlines basic design controls and is supplemented by the MDT *Geometric Design Standards* which provide design criteria summary tables for the geometric design of MDT rural and urban facilities. Relating to ADA accommodations, the section on sidewalks requires a minimum clear width of 60 inches, maximum cross slope of 1:50 (vertical rise to horizontal run), maximum gradient of 5 percent, and an 18-inch-wide buffer between the edge of the sidewalk and any fall hazard (such as ditches and steep embankments). The standards note that where it is impractical to provide the minimum clear width of 60 inches, a minimum 36-inch clear width and 60-inch-by-60-inch clear passing spaces should be provided at 200-foot minimum intervals.

TranPlanMT (2017)⁹

TranPlanMT is Montana's statewide long-range transportation plan that sets overarching statewide policy goals and priorities for MDT's multimodal transportation system. The plan outlines existing and projected conditions related to transportation assets, users, context, and management and defines a series of goals and strategies to address priority areas. The plan notes the importance of providing pedestrian facilities to increase mobility and accessibility, enhance safety, and to cultivate an environment in which non-motorized transportation modes are recognized as a valuable component of transportation choice for Montana residents and visitors. To meet user needs, the plan recognizes that sidewalks and supporting features such as curb ramps, crosswalks, and pedestrian signals are important physical assets within MDT's multimodal system.



TranPlanMT outlines MDT's prioritization process for making roadway investment decisions according to (1) system preservation and maintenance, (2) mobility and economic vitality, and (3) accessibility and connectivity. Reflecting public and stakeholder feedback and data analysis, TranPlanMT defines the following goal and strategies related to accessibility and connectivity.

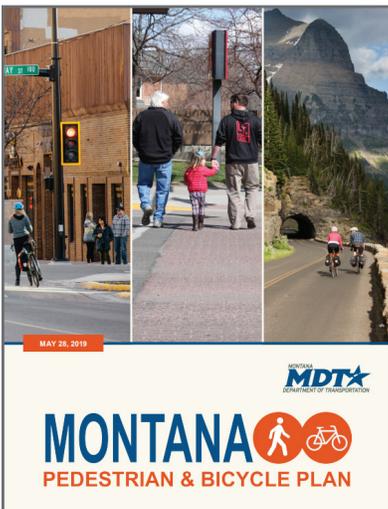
- **Goal:** Preserve access to the transportation network and connectivity between modes.
- **Strategies:**
 - AC1: Improve pedestrian, public transportation, and other MDT-owned facilities to ensure accessibility to individuals with disabilities.
 - AC2: Employ an asset management system to monitor and manage public transportation capital assets.
 - AC3: Implement a consistent approach for investment, design, connectivity, and maintenance of pedestrian and bicycle facilities.
 - AC4: Identify and consider accessibility and connectivity needs on improvement projects.
 - AC5: Coordinate use of public transportation systems through integrated planning with providers.
 - AC6: Maximize efficiency of transportation options available to disadvantaged populations.

Shared Use Paths Inventory and Detailed Maintenance Plan (2018)¹⁰

In accordance with House Bill 604 passed during the 64th Montana Legislature, MDT maintains an inventory of trails and paths created under the *Montana Footpath and Bicycle Trail Act of 1975*. MDT maintains information on path length and width, condition, setting, type of path, and agency responsible for maintenance. The 2018 MDT *Shared Use Paths Inventory and Detailed Maintenance Plan* inventoried 203.4 miles of shared use paths within MDT right-of-way, which only represent a portion of those within the state. Current maintenance needs to restore these paths to excellent condition totals a one-time cost of approximately \$363,000. Other activities are essential for maintenance, such as snow removal, sweeping, and mowing, in addition to ongoing pavement preservation activities like pavement seals and pavement overlays. The annual cost for general maintenance activities was approximately \$945,000 in 2018, which was mostly for snow removal. While local agencies have maintenance responsibility through agreements with MDT to maintain some shared use paths, many jurisdictions have difficulty meeting their maintenance obligations due to lack of funding, limited personnel, and insufficient equipment.



Montana Pedestrian & Bicycle Plan (2019)¹¹



The 2019 *Montana Pedestrian and Bicycle Plan* is the first statewide effort to address the needs of non-motorized users across the state. The plan is primarily aimed at providing consistency across MDT for considering pedestrian and bicycle modes on state owned and maintained facilities but is also intended as a resource by other agencies working to fulfill the needs of pedestrians and bicyclists in Montana.

The plan recognizes that walking and bicycling are important mobility opportunities for the state's vulnerable populations who are frequently transportation disadvantaged such as seniors, minority, and low-income individuals and families. Accessibility barriers, such as steep curb ramp slopes, vertical sidewalk discontinuities, and lack of pedestrian facilities are often a hindrance to mobility for non-motorists. The plan also points out that design guidance for accessible non-motorized facilities has evolved rapidly in recent years and may not be a natural part of the roadway design process. Flexible design that achieves safe and inclusive roadways may require additional training of design staff, support from local agencies and MDT, and endorsement of outside design guidance from traditional sources.

The plan identifies a guiding vision and series of goals that recognize the need for a balance between transportation choice, connectivity, accessibility, system preservation and maintenance, public health, safety, education, and environmental stewardship. The plan defines the following goal and strategies related to improving mobility and accessibility.

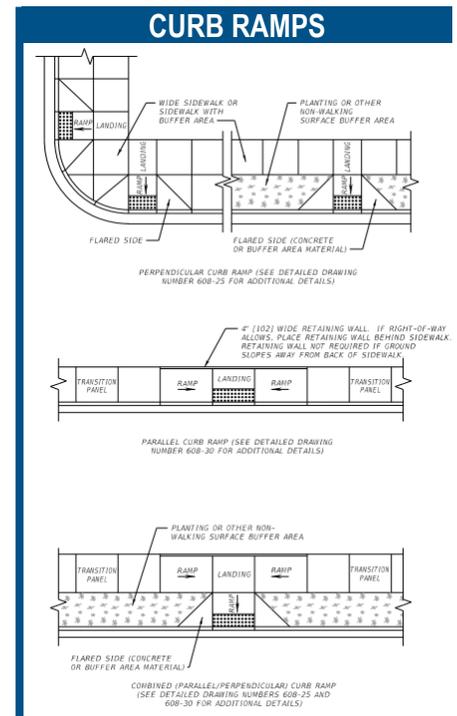
- **Goal 4:** Improve mobility and accessibility for all.
 - **Strategy 4A:** Improve accessibility and mobility using current design guidance and modern technology when building, upgrading, and retrofitting pedestrian and bicycle facilities.
 - **Strategy 4B:** Provide safe access to schools and areas with significant senior, minority and low-income populations.



Detailed Drawings (2020)¹²

The following are standard design details used on MDT projects related to ADA accommodations and accessibility, with selected notes listed below where applicable.

- **[608-05] Concrete Sidewalk:** The minimum width of new sidewalk is 4 feet. The continuous clear width of pedestrian access routes is 4 feet min. The clear width between obstructions or an obstruction and the edge of sidewalk is 4 feet min. Where factors such as limited right-of-way dictate the installation of a new sidewalk less than 5 feet in the width the new sidewalk must have passing areas at a maximum spacing of 200 feet. A passing area is a minimum of 5 feet by 5 feet in size. The desirable cross slope of the sidewalk is 1.5% while the maximum constructed cross slope is 2%.
- **[608-15] New Construction Curb Ramps:** Use curb ramps in order of preference: perpendicular, combined parallel/perpendicular, parallel. Use the flattest slopes possible (5% min) for all curb ramps. Do not place drainage structures in conflict with curb ramps. When altering existing facilities, meet new construction requirements to the maximum extent feasible. When ADA standards cannot be achieved, document with an ADA Statement of Technical Infeasibility Form.
- **[608-25] Perpendicular Curb Ramps, [608-30] Parallel Curb Ramps, and [608-35] Curb Ramp Design Options for Curb-Tight Sidewalks**
 - Desirable length of landing is 5 feet. The minimum landing length is 4 feet.
 - The desirable width of the landing is 5 feet. The minimum landing width is 4 feet. If the landing is constrained, the minimum width is 5 feet.
 - The desirable slope for curb ramps is 5% to 7.1%. The maximum slope is 8.3%.
 - The desirable slope for the flared side of the curb ramp is 8.3% or flatter. The maximum slope is 10%.
 - The desirable cross slope of the sidewalk, ramp, or landing is 1.5% or less. The maximum is 2%.
 - Provide detectable warning devices on the bottom 2 feet of each ramp.
 - There is no tolerance for exceeding maximum standards.
 - Where existing site development conditions prohibit the strict and full compliance of all ADA criteria, provide accessibility to the maximum extent feasible. Document with an ADA Statement of Technical Infeasibility form when ADA standards can't be achieved.



- **[608-40] Detectable Warning Devices:** Install detectable warning devices that extend the full width of the ramp, 2 feet in depth.
- **[618-U05] Sidewalk Closures and Bypass Walkway:** Ensure that entire walkway meets ADA requirements. Provide a minimum walkway width of 5 feet and a firm, stable, slip resistant walking surface along entire walkway. Provide temporary ramps and detectable edging (minimum 6-inch height) on both sides of walkway along temporary pedestrian detour route.
- **[619-00] Sign Clearances and Mounting Heights:** Within the city limits or in a sidewalk and curb area, mount signs to have the proper clearances, but avoid any conflict between the post and the main walking area of the sidewalk, or with doorways or windows of adjacent buildings.

Standard Specifications (2020)¹³ and Special Provisions (2013)¹⁴

The following are standard specifications and special provisions used on MDT projects related to ADA accommodations and accessibility. The specifications and provisions typically provide a description of the item, materials, construction requirements, method of measurement, and basis of payment. Selected notes are listed below where applicable.

- **[608] Concrete Sidewalks:**

- 608.03.3 Detectable Warning Devices (DWD)

- *General.* Install DWDs as shown in the Detailed Drawings. If DWDs require cutting or modification, locate non-factory edges on the exterior side of DWD installation.
- *Retro-Fitting.* Saw cut from existing sidewalk the minimum area required to allow installation. Remove the old sidewalk full depth within the cut area. Place new concrete meeting Section 608 requirements and install DWD in accordance with manufacturer recommendations.

- **[617] Traffic Signals and Lighting**

- 617.03.14 Traffic and Pedestrian Signals

- 617.03.17 Pedestrian Push Buttons: Install the push button and sign on the crosswalk side of the pole with the arrow pointing in the direction of the crosswalk.
- 617-9 Pedestrian Hybrid Beacon (Electrical Special Provisions): Provide one pole mounted Pedestrian Hybrid Beacon (PHB) controller for each PHB location; provide two pole mounted PHB signal heads for each PHB mast arm as described in the plan details.

- **[618] Traffic Control**

- 618.03.2 Traffic Control Plan

- *Pedestrian Traffic Control.* Always provide ADA compliant temporary measures for pedestrian facilities. If closures of pedestrian routes are required, identify the proposed measures to warn, direct, and guide pedestrian traffic.

- **[703] Lighting and Signal Materials**

- 703.08 – Traffic and Pedestrian Signals: Furnish 16 x 18-inch pedestrian indications that utilize LEDs for the “UPRAISED HAND” symbol, the “WALKING PERSON” symbol and the countdown display. Furnish indications with a countdown display that is at least 9 inches in height.

- 703.10 – Pedestrian Push Buttons: Furnish Accessible Pedestrian Signals (APS) that include the pedestrian pushbutton and housing combination with a locator tone to indicate the location of the button. The volume of the locator tone must automatically adjust to ambient noise level. The button must have a raised arrow, which can be adjusted to point toward the appropriate crosswalk. The APS must also provide vibro-tactile information, in the form of the button vibrating during the appropriate Walk signal. When voice messaging is required, provide accessible pedestrian signal stations with custom voice messages that provide location information on a button push, and street crossing message when the appropriate walk signal activates.





Bus Stop Review/Approval¹⁵ & MDT Bus Stops/Parklets/Pedlets (2020)¹⁶

These documents outline the process for considering requests for new and existing unpermitted bus stops and parklets/pedlets within MDT right-of-way, with stipulations for required agreements and permits. As outlined in the review and approval requirements, new bus stops must meet or exceed current MDT standards for accessibility as set forth by the United States Department of Justice 2010 ADA Standards for Accessibility Design, United States Access Board Proposed Guidelines for Pedestrian Facilities in the Public Right-of-Way (2011 PROWAG), and MDT's detailed drawings, 608 series. Specifically, requirements include:

- A 5'x8' boarding and alighting area that is firm, stable and slip resistant.
- Must be connected to an accessible route (sidewalk, shared-use path, roadway shoulder in absence of dedicated pedestrian facility).
- Slopes cannot exceed 2% in boarding area.
- Must maintain a minimum 48" unobstructed path of travel, exclusive of the width of the curb, and taking signage or other obstacles into account.
- Additionally, bus stops may not be placed on a sidewalk or on a crosswalk.



Seasonal use requests are addressed in the procedure for parklets and pedlets, which are temporary structures located on state-maintained highway right-of-way that serve to extend business access and accommodate pedestrians as appropriate. Day-use of state-maintained highway rights-of-way such as furniture placed on sidewalks and removed each day is considered by MDT on a case-by-case basis.

MDT Communications Guidelines (No Date)¹⁷

MDT Communication Guidelines



The *MDT Communications Guidelines* provide specific guidelines for logo use, color use, font use, layout, and messages to help ensure consistency and cohesiveness in MDT's messaging. The guidelines must be followed for any outward-facing publications. The guidelines require a minimum size, standard coloring with appropriate contrast, and appropriate clarity of the MDT logo to ensure ADA accessibility. The guidelines also note that text should be no smaller than 8-point font to comply with ADA requirements. All font and color combinations should meet ADA visual standards and specific color combinations such as red-green, green-yellow, and blue-yellow should be avoided to ensure ADA requirements for legibility are met. Additionally, all printed materials, or materials available for printing, must include an ADA disclaimer. The phrasing of the ADA disclaimer varies depending on the type of outreach material (such as event promotion type, flyers, and publications) but all standard disclaimers include information detailing how to request special accommodations such as an auxiliary aid or alternative accessible formats of documents.

Public Involvement Plan (No Date)¹⁸

MDT recognizes that engaging the public early and throughout the transportation decision-making process is key to building trust and credibility for the department and enhancing the awareness and understanding of MDT actions and business practices. The MDT *Public Involvement Plan* provides guidance to MDT staff, consultants, and subrecipients to offer opportunities for public input at key decision points in planning and project development. To ensure all individuals have equal opportunity to participate, MDT requires that a standard ADA disclaimer providing information on accessible alternative accommodations be included on all printed material. Additionally, all videos must be closed captioned or a corresponding script must be provided.

CHAPTER 2: PUBLIC AND STAKEHOLDER OUTREACH

Public and stakeholder input is an essential element in the transition plan development and self-evaluation processes. ADA implementing regulations require public entities to provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the self-evaluation process and development of the transition plan by submitting comments (28 CFR 35.105(b) and 28 CFR 35.150(d)(1)).





2.1. INVOLVEMENT STRATEGIES

MDT used the following on-demand and targeted engagement strategies during the plan update process to elicit meaningful participation from a wide-ranging audience.



Website

A project website was used to encourage public interaction and to provide information about the plan update. The website was hosted by MDT and updated throughout the planning process. Informational material posted to the website included a description of the transition plan update process, contact information, meeting announcements, frequently asked questions (FAQs), and published documents.

Stakeholder Meetings

Two sets of initial virtual meetings were held with stakeholder representatives in May 2021 to share findings and recommendations in consideration of public and stakeholder coordination. A final stakeholder meeting was held in October 2021 to provide an overview of the draft *ADA Transition Plan*, highlight key program changes and progress since 2016, and request stakeholder feedback.

The live event format enabled participants to listen to a presentation, ask questions, and receive responses from the project team in real time. For those without access to the internet or other accessibility barriers, alternative access was offered through mailed copies of printed materials and appropriate accessibility accommodations. Copies of the meeting summaries, presentations, and email announcements are provided in Appendices **B2** and **B3**.

Public Survey

MDT facilitated an online survey to collect opinions and feedback about transportation accessibility on state routes. The survey was available through the MDT website, and an online link was emailed to stakeholder representatives to distribute to their membership groups. This method of distribution was intended to maximize participation rather than provide statistically significant results applicable to the state population or the disability community as a whole.

The survey included basic demographic questions addressing geographic location, age group, and disability status. Respondents were also asked about their travel habits, typical trips, and frequent travel destinations. The survey asked respondents to list perceived accessibility barriers limiting mobility from a system-wide perspective (as opposed to individual spot locations).

A total of 69 individuals participated in the online survey. Survey respondents included individuals with a range of disabilities, disability advocates, and family members, friends, or caregivers to individuals with disabilities. Respondents represented a variety of community settings in 23 of Montana's 56 counties.

Survey respondents indicated that ADA accommodations (such as accessible curb ramps, and pedestrian signals) along with a clear, unobstructed path of travel are most important to them as pedestrians. A need for accessibility improvements was identified for pedestrian pathways, sidewalks, curb ramps, and crosswalks. Of MDT's



building facilities, rest areas followed by MDT District offices were ranked highest in terms of needed accessibility improvements, with curb ramps and sidewalks at these facilities indicated as the highest priority. Additionally, respondents indicated a desire for improvements to mapping and public involvement accessibility. A copy of the survey summary is provided in **Appendix B1**.

Social and Traditional Media

MDT announced the availability of the draft *ADA Transition Plan* on its social media platforms. Social media posts encouraged the public to review the plan, participate in the online open house, and submit feedback to MDT. Additionally, MDT issued a statewide press release announcing the public review period and online open house, and MDT staff participated in a recorded interview about the draft plan with an NBC news affiliate.

Online Open House

During the public review period for the draft transition plan, MDT hosted an online open house to explain the *ADA Transition Plan* update process, summarize key findings, and share relevant updates to the plan. A separate page on the MDT website provided links to a pre-recorded video, informational summary sheets, MDT contacts, and the MDT online comment form. Members of the public were invited to view information and submit comments at their convenience during the open house/review period.

2.2. PLAN AVAILABILITY AND PUBLIC REVIEW PERIOD

The 2021 draft transition plan was made available for public review and comment from October 15 through November 5, 2021. A link to the draft document was provided on the MDT ADA webpage and emailed to approximately 250 stakeholder representatives.

Summary of Public Comments

During the public review period, one written public comment was received from a representative of North Central Independent Living Services, Inc. (see Appendix **B4**). The comment addressed accessibility in areas of public transit/microtransit, urban and rural roadway corridors, highway shoulders, structures, trails, and automated vehicles. The comment also noted accessibility challenges in Montana relating to wayfinding, snow removal, and continuity of pedestrian facilities.

Informal comments made by stakeholders during the public review period stressed the importance of considering and addressing all accessibility barriers along a route, in addition to non-compliant curb ramps. Disconnected or poorly maintained sidewalks between intersections, obstructions in the sidewalk such as signs or pedlets, and connectivity to accessible crosswalks are important considerations.



ADA TRANSITION
PLAN UPDATE
Montana Department of Transportation

CHAPTER 3: ADA PROGRAM METHODS

In support of the MDT mission and ADA policy, and in alignment with other plans and documents relating to ADA, the following sections outline methods MDT uses to make its programs, rights-of-way, and building facilities accessible to individuals with disabilities in fulfillment of 28 CFR 35.150(d)(3)(ii).





3.1. ADMINISTRATION

MDT is committed to administer, provide oversight responsibilities, and ensure compliance with the law and federal and state guidance relating to ADA compliance. The Office of Civil Rights ensures MDT conducts business in an environment free of discrimination, harassment, and retaliation on the grounds of protected status, including physical or mental disability, in all state, federal and federally assisted MDT programs.

METHOD 1: EMPLOY AN EXTERNAL ADA COORDINATOR.

ADA implementing regulations require public entities to designate at least one employee to coordinate efforts to comply with and carry out ADA responsibilities. The external ADA coordinator resides within the MDT Office of Civil Rights, whose mission is to ensure all beneficiaries and potential beneficiaries of MDT programs are offered an equal participation opportunity.

MDT's external ADA coordinator is responsible for guiding MDT's program to ensure people with disabilities have equitable opportunities to use the transportation system within MDT right-of-way. The external ADA program oversees and guides the implementation of the plan to provide accessible public rights-of-way and facilities. The external coordinator is a department-wide resource and helps to ensure consistent statewide application of MDT's ADA policies and procedures in support of the plan. Other responsibilities of the external coordinator include responding to ADA inquiries, providing technical guidance on ADA standards during design and construction activities, overseeing ongoing data collection and reporting requirements, responding to requests for accessible materials or auxiliary aids and services, and conducting or arranging ADA training for employees throughout the department.

Contact information and a role description for the MDT external ADA coordinator are provided on MDT's website.

METHOD 2: CONDUCT OUTREACH WITH TRANSPORTATION OFFICIALS.

The MDT Office of Civil Rights regularly coordinates with state, local, and federal transportation officials to discuss the MDT external ADA program, advance progress of the MDT *ADA Transition Plan*, and coordinate ADA decisions related to project identification, delivery, and operations. Coordination extends to the MDT Aeronautics Division, Information Services Division, Highways and Engineering Division (including Preconstruction and Construction Programs), Maintenance Division, Motor Carrier Services Division, and the Rail, Transit and Planning Division, MDT Districts, the Federal Highway Administration (FHWA), metropolitan planning organizations (MPOs), and other local partner agencies. Regular collaboration occurs on ADA-related topics, including data management, project prioritization and identification, inventory status, funding recommendations, public comments, changes in regulations and policies, and issues relating to design, construction, and maintenance.



MDT regularly consults with organizations representing the disability community, including regional independent living centers, to coordinate community education and outreach.

Additionally, the MDT external ADA coordinator regularly collaborates with MDT Districts on ADA issues and needs within each geographic area, including consideration of curb ramp demand and compliance status, priority areas for barrier removal, planned projects within each District involving ADA upgrades, and accessibility and connectivity needs within specific communities.

METHOD 3: COORDINATE WITH REPRESENTATIVES OF THE DISABILITY COMMUNITY.

The MDT external ADA coordinator works closely with advocacy groups and disabled individuals to identify critical ADA needs and obtain feedback on the MDT external ADA program. MDT maintains a list of ADA stakeholders which includes numerous organizations representing the disability community, including regional independent living centers located throughout the state. MDT regularly consults with these organizations to coordinate community education and outreach and periodically provides updates on MDT's ADA policies and procedures. MDT welcomes feedback from these organizations and strives to consider all comments to assure the disability community is fairly and equitably represented through MDT's ADA program. Additionally, MDT personnel may invite disability community representatives to participate in walk audits during project scoping activities as appropriate to better understand ADA needs from the perspective of disabled users.

METHOD 4: PROVIDE PUBLIC NOTICE ABOUT ADA REQUIREMENTS.

Under Title II, MDT must make information about ADA requirements pertaining to its services, programs, and activities available to the public. MDT maintains an ADA website, which includes a description of the ADA program, ADA coordinator contact information, and links to MDT's *ADA Transition Plan* and associated barrier status report, public notice document, complaint procedures form, accommodations request, applicable federal regulations, and other ADA-related information.

METHOD 5: PUBLISH GRIEVANCE PROCEDURES FOR RESOLUTION OF ADA COMPLAINTS.

Public entities employing at least 50 people are required to adopt and publish grievance procedures providing prompt and equitable resolution of complaints. MDT's grievance procedure and form are located on the Office of Civil Rights website accessed through the following link: <http://www.mdt.mt.gov/business/contracting/civil/external-ada.shtml>. Alternative accessible formats are available upon request. The grievance procedure provides a mechanism to document and track complaints. MDT develops action items in response to each complaint and strives to resolve complaints through a mediation.



MDT personnel may participate in walk audits during project scoping activities to understand ADA needs from the perspective of disabled users.

METHOD 6: PROVIDE A MECHANISM FOR TRACKING NON-GRIEVANCE ADA COMMUNICATION AND INFORMAL INQUIRIES.

MDT offers the opportunity for the public to submit inquiries regarding any ADA-related issue via a comment form on the MDT website. The form captures ADA inquiries that do not constitute a formal grievance complaint but involve ADA external policies, decisions, or physical assets. MDT considers public feedback and inquiries and provides an appropriate response to each comment. The comment form is available at the following link: http://www.mdt.mt.gov/mdt/comment_form.shtml. Alternative accessible formats are available upon request.

METHOD 7: PROVIDE WRITTEN ASSURANCE GUARANTEEING NON-DISCRIMINATION.

As a condition of federal aid under Section 504 of the Rehabilitation Act of 1973 (49 CFR 27.9), MDT must guarantee non-discrimination and ensure new projects will be ADA compliant. MDT includes a non-discrimination agreement on all federally funded projects. The document requires MDT to comply with federal statutes, policies, and procedures. The document states no person may be excluded from federally funded programs on the grounds of race, color, national origin, sex, age, and handicap/disability. ADA compliance must also be assured on all federally funded projects conducted by sub-recipients of federal funds.

METHOD 8: ENSURE PERSONNEL ARE APPROPRIATELY TRAINED REGARDING ADA REQUIREMENTS.

MDT facilitates varying levels of ADA training to employees depending on personnel involvement with ADA. MDT District and Headquarters personnel receive training addressing inventory, design, review, construction, and maintenance of ADA features in support of the ADA policy statement. This training reinforces the importance of ADA regulations and educates personnel on applicable ADA requirements. MDT personnel may also participate in walk audits during project scoping activities to understand ADA needs from the perspective of disabled users.



3.2. COMMUNICATIONS

Government agencies must communicate and interact effectively with the public. MDT uses various communication methods to assist the disability community including auxiliary aids, services, information, and signage. MDT attempts to eliminate communication barriers by offering a variety of auxiliary aids and services to the disabled community upon request.

METHOD 9: OFFER AUXILIARY AIDS AND SERVICES TO ELIMINATE COMMUNICATION BARRIERS.

Communicating by telephone can be a hardship for people with hearing or speech impediments. To address this difficulty, MDT lists the Montana Relay number (operated by the Montana Telecommunications Access Program) in a variety of MDT documents including press releases and public meeting notifications, brochures, and on the MDT website. To address language barriers, the MDT website provides a list of interpreters speaking multiple languages including sign language. The list provides information regarding interpreter location, contact information, conversation skill, reading/writing skill, fees, and qualifications. MDT uses at least two interpreters in most languages and numerous interpreters for languages such as French, German, and Spanish.

The three primary auxiliary aids for people with a sight disability include Braille, enlarged text, and audio documents. The majority of MDT documents can be provided in Braille or large text and are available upon request. Documents can also be converted to an audio format upon request.

In addition to commonly used auxiliary aids and services, MDT makes efforts to provide additional aids and services upon request. MDT strives to provide accessible information to the public and attempts to accommodate all disability types.

*MDT strives to provide **accessible information** to the public and attempts to accommodate all disability types.*

METHOD 10: INFORM THE PUBLIC OF ACCESSIBLE SERVICES, ACTIVITIES, AND FACILITIES, AND SHARE INFORMATION ABOUT ADA PROJECTS.

Title II requires public entities to ensure disabled persons can obtain information about the existence and location of accessible services, activities, and facilities. In support of this requirement, the *MDT Communication Guidelines* provide instructions on using accessibility statements addressing reasonable accommodations for training events/public meetings/hearings and alternative accessible formats for materials made available to the public. These statements explain how members of the public can obtain an accommodation to participate in MDT programs and services.

MDT's website is a key platform for providing information to the public. To ensure accessibility, information provided on the website must be compatible with appropriate software to accommodate specific disabilities. MDT provides appropriate software programs upon request to assist with web accessibility.

Signage is another major aid in providing public information and direction. MDT follows ADA design guidelines to ensure signs are readable and accommodating to the disability community. Sign standards include the use of large letters and symbols accompanied by Braille. The standards are the foundation for providing clear informational and directional signage to all members of the public.

MDT also works with public involvement specialists to share information about projects involving targeted improvements to ADA features. Outreach efforts typically include a project overview, education about why accessibility improvements are needed, construction updates, and the opportunity for public comment.



3.3. RIGHTS OF WAY

Under Title II of the ADA, MDT must assure all of its physical assets are ADA compliant, including existing and newly constructed features. Right-of-way features include elements such as curb ramps, sidewalks, crosswalks, median crossings, and pedestrian activated signal systems.

ADA-compliant rights-of-way are designed and constructed in a manner readily accessible and usable by individuals with disabilities. Examples of non-compliant accessibility barriers include steep curb ramp slopes or sidewalk discontinuities that may cause trip hazards.

The following sections discuss methods for rights-of-way inventory data collection, data tracking, and methods for removing physical accessibility barriers.

ADA Inventory

METHOD 11: MAINTAIN AN INVENTORY OF EXISTING ADA FEATURES.

Program evaluation is necessary to identify where physical barriers limit accessibility within MDT's transportation system. This self-evaluation process provides an assessment of current compliance status to assist MDT in prioritizing actions and monitoring progress, making the process critical to the success of the MDT *ADA Transition Plan*.

In fulfillment of this requirement, MDT conducted a complete statewide assessment of its intersection right-of-way features. Through an initial pre-screening procedure, rural conditions were reviewed using aerial photography and street view coverage to determine if dedicated pedestrian facilities were present. Field visits were conducted on the remaining intersections. Approximately 16,000 individual curb ramp locations were inspected in the summer of 2015 to identify any deficiencies in existing right-of-way elements. The curb ramp inventory also included identification of the presence of sidewalk at each curb ramp and whether the sidewalk was continuous to the adjacent intersection. Inventory of signalized intersections included accessible pedestrian signals. The primary objective of the data collection effort was to record barriers using a consistent and disciplined methodology that included measurement of the most restrictive condition. This technique established baseline parameters against which progress towards overall compliance can be demonstrated. MDT conducts ongoing inventory as new improvements are constructed and accessibility barriers are removed through programmed projects and ongoing maintenance efforts.

The MDT Information Services Division maintains a geodatabase of ADA right-of-way features. The database enables MDT to query data, summarize data sets in output reports, conduct annual reporting, and track progress toward compliance. **Appendix C** contains an annual status report of inventoried assets as of 2021. The online database information can be found at the following link: <http://mdt.maps.arcgis.com/home/webmap/viewer.html?webmap=2e0e0f82015443718b45b89139be8a3b>. Alternative accessible formats are available upon request.

TOTAL INTERSECTIONS	13,792
Intersections <i>Without</i> Pedestrian Facilities	10,264
Intersections <i>With</i> Pedestrian Facilities	3,528
<i>Intersections Inventoried</i>	3,481
<i>Intersections Not Inventoried</i>	47
Percent Complete	99.7%
<i>Total Ramps Inventoried</i>	15,246

*As of September 2021

METHOD 12: CONSIDER ADA INVENTORY SYSTEM COMPATIBILITY WITH OTHER APPLICABLE DATA MANAGEMENT SYSTEMS.

MDT uses multiple inventory and data management systems to collect data. For example, construction personnel collect field data on constructed project features and are responsible for completing ADA ramp documentation spreadsheets including measurements of constructed ramp features before project close out. Similarly, the Traffic and Safety Bureau maintains an inventory of traffic signals. The Information Services Division works closely with other divisions and bureaus to incorporate ADA data from other sources into the ADA database and eliminate duplicative efforts. The ADA database may evolve to consider compatibility with other data management systems.

METHOD 13: SCORE RIGHT-OF-WAY FEATURES TO IDENTIFY CRITICAL ADA NEEDS.

MDT uses a composite system to score its right-of-way infrastructure and assigns points based on demand and ADA compliance. A higher score indicates a non-compliant feature with high demand, while a lower score indicates a compliant curb ramp with low demand. Composite scores are used to group and classify barriers according to MDT Districts, counties, communities, and corridors.

ADA implementing regulations (28 CFR 35.150(d)(2)) note transition plans should give priority to walkways serving entities covered by the Act, including state and local government offices and facilities, transportation, transit, places of public accommodation, and employers, followed by walkways serving other areas. The Montana structures framework is a statewide spatial database of structure and address points used to assign demand scoring for right-of-way features based on proximity to prioritized structure types. Lower scores are assigned to features in areas with a low density of prioritized demand generators, and higher scores are assigned to features within proximity to a high density of prioritized demand generators, with a maximum score of 10 per curb ramp.

Compliance scores are calculated by assigning a score of zero for fully compliant features and allocating points for non-compliant curb ramp elements, with a maximum score of 10 per curb ramp.

Composite curb ramp scores are calculated by multiplying the demand score by the compliance score, with a maximum possible score of 100 indicating a fully non-compliant ramp or an undeveloped ramp in an area of high demand. **Appendix D** contains a scoring report of inventoried assets by compiled by MDT District, county, urban area, and community.

Figures 1 and 2 on the following page summarize the steps involved in the curb ramp scoring process as well as the possible ranges for curb ramp scores.

Composite scores serve as a starting point for MDT to identify critical areas in need of barrier removal.

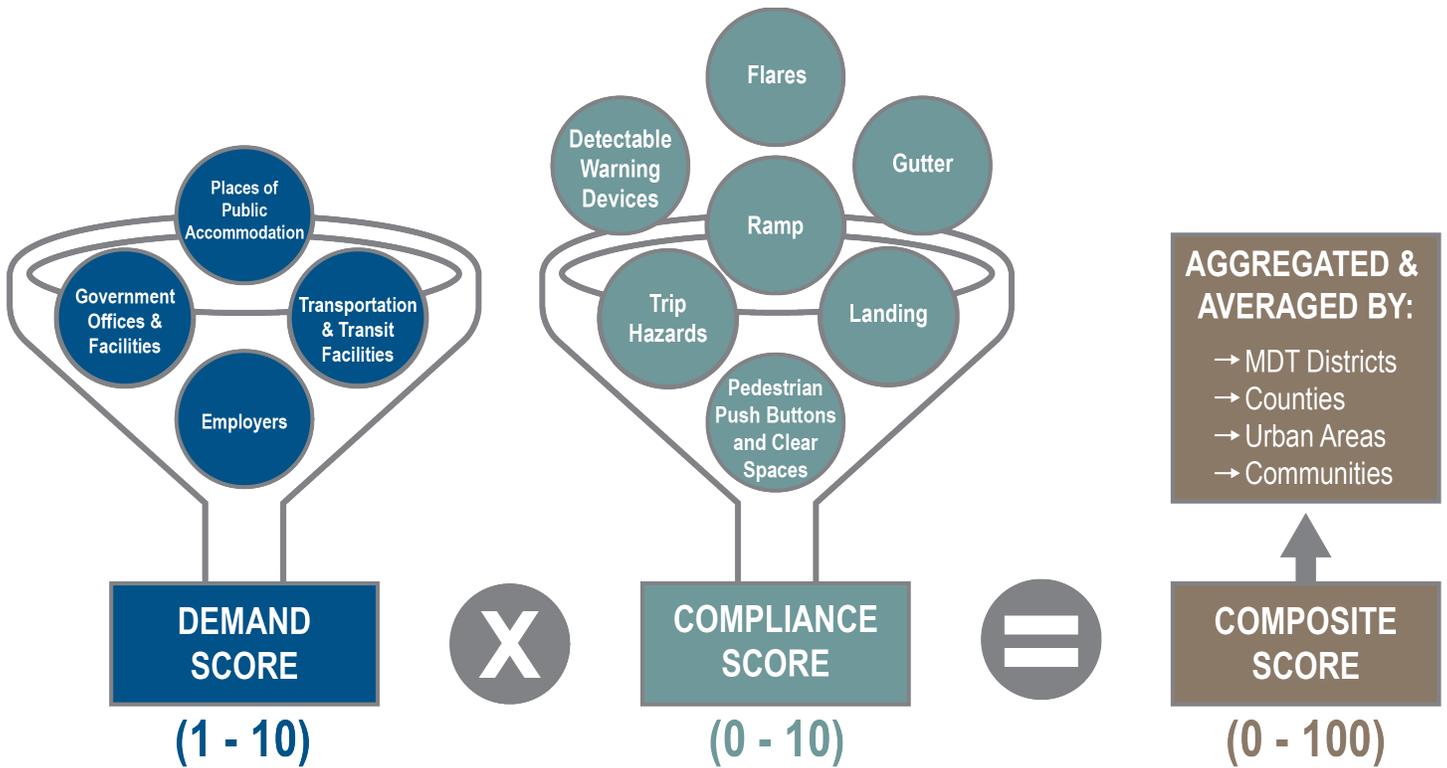


Figure 1: Scoring Process Summary

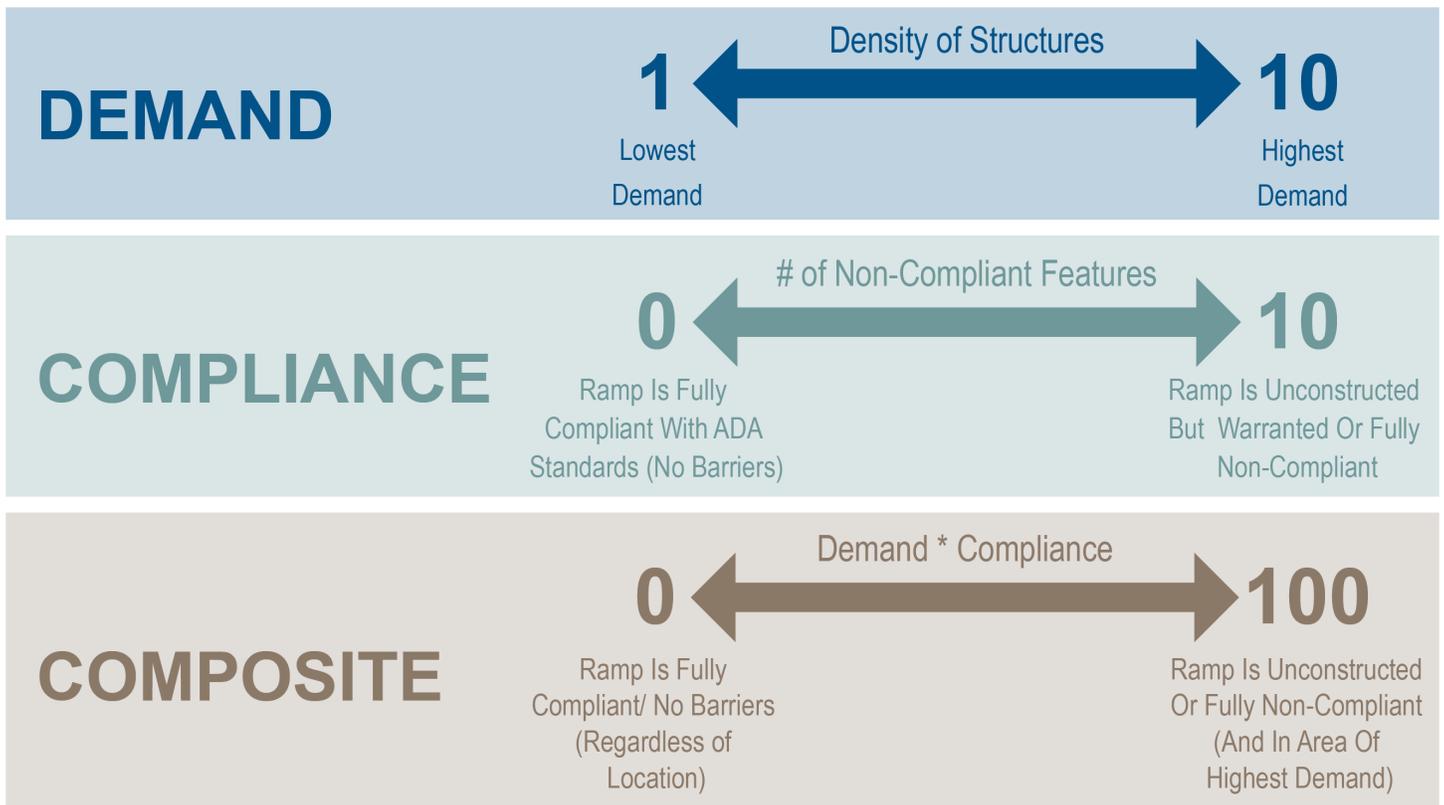


Figure 2: ADA Curb Ramp Possible Scoring Ranges

Project Identification

METHOD 14: IDENTIFY PROJECTS USING RISK-BASED ASSESSMENT OF DEMAND AND COMPLIANCE SCORING, IN COMBINATION WITH SAFETY PERFORMANCE, PROXIMITY TO PROGRAMMED PROJECTS, LOCAL PLANNING, AND PUBLIC FEEDBACK.

Curb ramp scoring provides an initial indication of risk level for individual ADA features. The compliance score alone indicates the number of non-compliant features, while the composite score incorporates a demand evaluation indicating the potential level of pedestrian usage. Together, these scores serve as a starting point for MDT to identify critical areas in need of barrier removal.

As shown in **Figure 3**, MDT also considers a range of additional factors to identify and prioritize ADA improvement projects. Safety performance influences project identification, and an identified mode conflict or crash trend at a particular location may provide further justification for an ADA improvement project. MDT considers projects identified in the Statewide Transportation Improvement Program (STIP), local planning efforts, and improvements to adjacent infrastructure already in process. MDT also considers public input and maintains a documented response process for comments regarding ADA. MDT relies on a collaborative process with internal and external stakeholders to identify areas of greatest need that can best be served by ADA improvements.

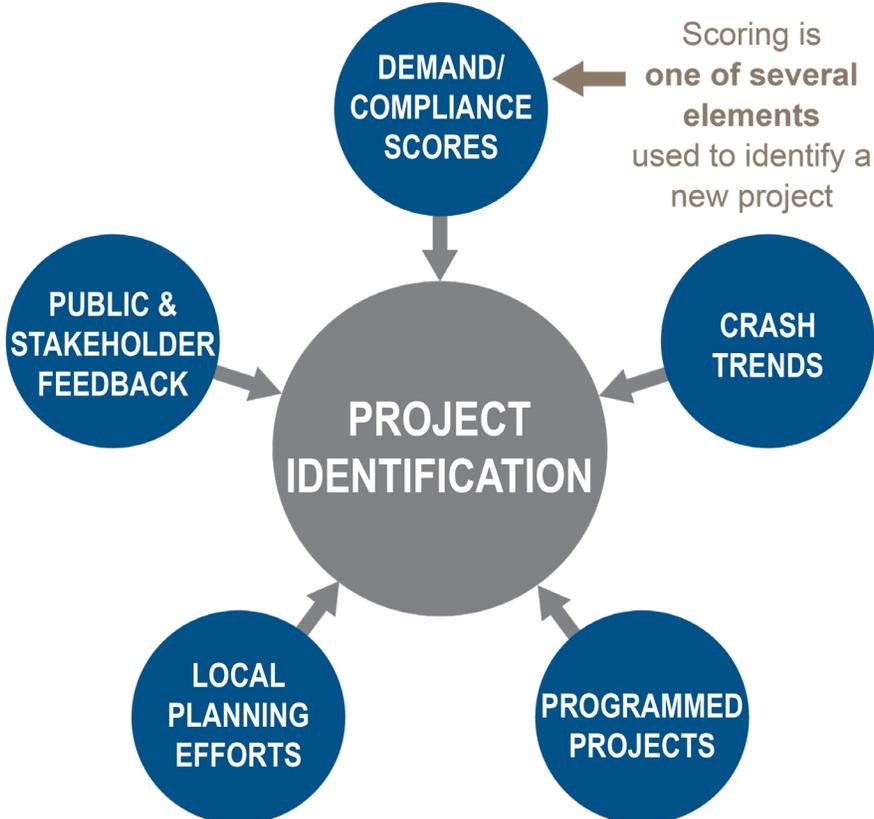


Figure 3: Project Identification Components



STAND-ALONE ADA PROJECTS

 **1,546**
CURB RAMPS

~7,200
LINEAR FT
SIDEWALK 

 **147**
APPROACHES
& ALLEYS

 **19**
MONTANA
COMMUNITIES

**2016 - 2021 Construction*

Note: Approximate sidewalk lengths were calculated from square yardage listed in project bids assuming a standardized width of 5 feet. Actual, constructed sidewalk lengths may vary.

METHOD 15: CONSIDER ADA COMPLIANCE USING AN ASSET MANAGEMENT METHOD.

Asset management is a business process for resource allocation and is driven by defined objectives and credible data from systematic assessments to justify investment decisions. An asset management approach provides many benefits, including objective, justifiable decision making; improved performance and service to customers; enhanced credibility, transparency, and accountability; lower long-term costs for infrastructure preservation; and improved use of available resources.

MDT uses an asset management method to develop an optimal investment plan and measure progress in moving toward strategic transportation system goals. Using this method, projects programmed for construction must address both a specific transportation need and contribute to overall transportation system performance goals. MDT considers feedback from customers, available resources, and system performance data to support investment decision making. Proposed projects are evaluated for consistency with guidance on funding allocation before they are selected and programmed for construction.

MDT assesses and monitors the condition of the transportation system using computer-based management systems. ADA compliance data (including the number of non-compliant features at a specific location or along a corridor) is used to measure and track progress toward eliminating accessibility barriers within the state's transportation system. This information ultimately informs funding guidance and development of performance targets for ADA compliance.

METHOD 16: DETERMINE AVAILABLE FUNDING SOURCES.

MDT uses multiple funding sources to deliver ADA improvements. ADA elements are eligible for funding under all federal programs and are routinely incorporated in bridge and roadway projects funded through MDT's core program. Funds for core program roadway projects are allocated to districts by type based on MDT's Performance Programming Process (Px3) asset management system recommendations.

In addition to core program funds, MDT uses Congestion Mitigation and Air Quality Improvement Program (CMAQ) funds to finance some of MDT's independent ADA improvement projects. The primary purpose of these projects is to specifically address non-compliant ADA features within a designated project area. The MDT Traffic and Safety Bureau also uses discretionary CMAQ funds for improvements to traffic signals, and in many cases, these projects incorporate ADA improvements. MDT will continue to evaluate funding availability under the CMAQ program and consider the program's effectiveness in targeting ADA barriers.

Pedestrian improvements may be funded through the competitive Transportation Alternatives (TA) program. Under this program, local project sponsors submit applications, which are scored by MDT and FHWA staff using a range of criteria which may include ADA compliance levels. Selected projects are administered by the MDT Consultant Design Bureau. Cities that employ 50 or more persons are required to develop an ADA transition plan.

Combined funding packages, including partnerships with local communities, are also used to help fund ADA improvements or extend the scope of ADA improvements

**ADA PROJECTS AS
PART OF OTHER
HIGHWAY PROJECTS**

 **1,544**
CURB RAMPS

 **~219,000**
LINEAR FT SIDEWALK

 **536**
APPROACHES
& ALLEYWAYS

 **31**
MONTANA
COMMUNITIES

435 
ACCESSIBLE
PEDESTRIAN SIGNALS

**2015 - 2021 Construction*

Note: Approximate sidewalk lengths were calculated from square yardage listed in project bids assuming a standardized width of 5 feet. Actual, constructed sidewalk lengths may vary.

addressed in a project that is primarily funded through other sources. For example, local projects such as overlays and utility replacements could be funded through a combination of local and MDT project funds to extend the scope of the local project to include ADA improvements.

ADA improvements may also be funded in part by developers who initiate projects that may impact the transportation system. MDT reviews private projects through the system impact action process to ensure impacts to the transportation system meet MDT design criteria and costs are recovered as appropriate.

METHOD 17: IDENTIFY LEVEL OF ADA EFFORT ASSOCIATED WITH PROJECT TYPE.

MDT identifies the appropriate level of ADA involvement depending on project classification, including new construction, reconstruction, rehabilitation, resurfacing, and preventative maintenance projects. In the case of resurfacing and rehabilitation projects involving alterations to existing infrastructure, existing pedestrian facilities are upgraded to meet ADA requirements to the maximum extent feasible (see **Method 25**), and new curb ramps are considered wherever curb, gutter, and sidewalk are adjacent to the project. Existing and potential pedestrian use is evaluated to determine possible ramp locations. FHWA guidance specifies that an alteration to existing infrastructure includes the addition of a new layer of asphalt, reconstruction, concrete pavement rehabilitation and reconstruction, open-graded surface course, micro-surfacing and thin lift overlays, cape seals, and in-place asphalt recycling¹. MDT complies with this guidance.

Installation of ADA features is generally not considered on routine or preventative maintenance activities such as painting or striping lanes, crack filling and sealing, surface sealing, chip seals, slurry seals, fog seals, scrub sealing, joint crack seals, joint repairs, dowel bar retrofit, spot high-friction treatments, diamond grinding, and pavement patching². Projects should not be under-scoped in an attempt to avoid the need to provide ADA upgrades. For example, a resurfacing project should not be shortened to end at the start of a section of roadway that has existing curb, gutter, or sidewalk. Conversely, ADA work would be beyond the scope of a micro-surfacing project on an intersection where no curb, gutter, or sidewalk currently exists.

METHOD 18: CONSIDER PROJECT FACTORS AND OPPORTUNITIES TO ENHANCE ADA PROJECT DELIVERY.

In nominating a project involving ADA features, MDT considers factors such as consistency with local and MDT plans, logical termini and connectivity with existing facilities, storm water and drainage facility conflicts, right-of-way ownership, utility conflicts, rail intersections, and level of environmental documentation. These factors may affect project limits and level of complexity.

It is important to identify and maintain the primary project purpose. However, MDT also considers opportunities to address multiple needs concurrently to

¹ Department of Justice/Department of Transportation Joint Technical Assistance on Title II of the Americans with Disabilities Act Requirements to Provide Curb Ramps when Streets, Roads, or Highways are Altered through Resurfacing, 2013.]

² Ibid.



MDT comprehensively addresses accessibility needs within the limits of stand-alone ADA projects.

MDT also recognizes the importance of considering each project's connection to adjacent pedestrian routes and broadly supporting pedestrian mobility and access.

optimize investment and to enhance mobility and connectivity for all users. MDT's approach is to comprehensively address accessibility needs within the limits of all stand-alone ADA projects. In addition to addressing curb ramps at intersection corners identified through the scoring process, MDT addresses mid-block crossing barriers at approaches, reconstructs non-compliant sidewalk, and constructs new sidewalk to provide accessible connections within the project limits. MDT also considers accessibility enhancements for pedestrian facilities with larger highway improvements, as appropriate within the scope of each project. Additionally, it may be beneficial to incorporate other associated intersection improvements addressing geometry or traffic signal upgrades at the time of an ADA upgrade project, or to address needed pavement preservation concurrently with high-priority ADA improvements.

Communication between MDT District and Headquarters staff, local government officials, regional independent living centers and other stakeholders, and members of the public is critical to ensure identification of related needs and projects. MDT recognizes the importance of considering each project's connection to adjacent pedestrian routes outside the project limits and broadly supporting pedestrian mobility and access. Project limits may be modified during the project scoping process in response to identified needs based on available funding. Modifications must meet the project purpose and need.

METHOD 19: COORDINATE WITH PARTNER AGENCIES TO IDENTIFY LOCAL PROJECTS AND FUTURE DEVELOPMENT ACTIVITIES.

MDT regularly communicates with partner agencies (including cities, counties, MPOs, and tribal governments) to discuss upcoming projects and anticipated future developments. This information helps MDT identify and plan its ADA improvements to coordinate with local efforts. In some cases, opportunities for coordinating project phasing may benefit MDT and local entities by incorporating ADA elements into larger projects and avoiding costly re-work at a future date.

MDT also encourages local governments to prepare ADA transition plans addressing right-of-way features under local jurisdiction. Local plans can help identify needs and define priorities for barrier removal.

METHOD 20: ESTABLISH AND DOCUMENT MAINTENANCE RESPONSIBILITY.

In some instances, MDT develops a memorandum of understanding (MOU) with local jurisdictions to address maintenance responsibility for sidewalks and pedestrian facilities adjacent to MDT routes. In other cases, local ordinances sometimes require adjacent landowners to accept responsibility for maintaining and clearing sidewalks. To minimize complications during project delivery, it is important to discuss maintenance responsibility early in the project identification process. All parties should understand and agree to the scope of work for the project, including the specific ADA features that will be designed and constructed. Waiting to document maintenance obligations after a project has already been constructed can lead to miscommunication about roles and responsibilities. MDT coordinates with local jurisdictions prior to project development to ensure maintenance responsibilities are defined.

Figure 4 summarizes MDT’s project identification and implementation process (Methods 14 through 20) as it relates to ADA improvements.

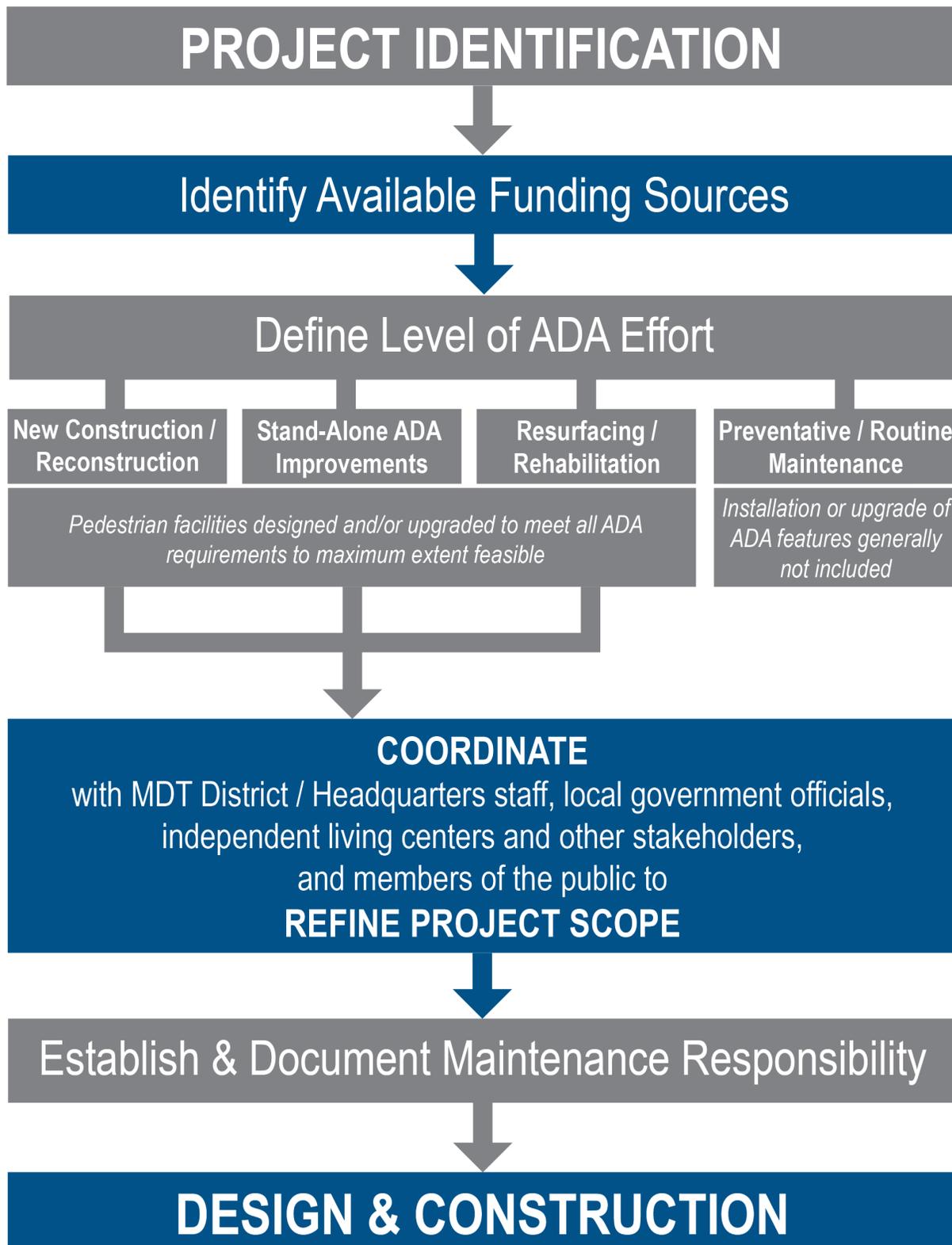


Figure 4: MDT’s Project Implementation Process



MDT subject matter experts design and review ADA improvements to assure adherence to applicable ADA regulations and policies. The External ADA Coordinator provides additional review as necessary.

Design and Construction

METHOD 21: CONSIDER RISK TO DETERMINE APPROPRIATE PROJECT DELIVERY METHOD.

MDT uses multiple mechanisms to deliver its projects, including traditional design-bid-build as well as alternative delivery methods. MDT considers risk, project scope and complexity, roadway system and jurisdiction, schedule considerations such as timing of funding obligations, and other factors to determine the best method for delivering each project.

ADA improvements included as part of a larger roadway rehabilitation or reconstruction project may be less complex than retrofit improvements within an existing roadway profile due to elements such as existing grades, obstacles, and available right-of-way. MDT will consider these factors to determine the best method for delivering ADA-compliant features.

METHOD 22: ASSIGN APPROPRIATE STAFF TO DESIGN AND REVIEW ADA DOCUMENTS.

ADA improvements are designed and reviewed by MDT subject matter experts (SMEs) trained in ADA design, construction, and retrofit complexities. In addition to overseeing ADA design efforts, ADA SMEs are also responsible for making ADA design decisions and determining the appropriate design response for a particular project through constant communication and coordination with MDT District personnel. MDT maintains an ADA decision matrix that provides design guidance for a variety of modification or retrofit scenarios. MDT also maintains a documented procedure to assure all entities are committed to the selected design response. The External ADA Coordinator provides additional review as necessary and works closely with SMEs to assure adherence to applicable ADA regulations and policies.

METHOD 23: DESIGN ADA IMPROVEMENTS IN ACCORDANCE WITH APPLICABLE MDT DESIGN STANDARDS AND FEDERAL REGULATIONS.

MDT has established standards and policies that provide guidance for installation of accessible features on newly constructed or altered public rights-of-way and facilities. The ADAAG and PROWAG are the two sets of guidelines for design of accessible features on new construction and alterations.

The U.S. Access Board developed ADAAG in 1991 and continues to maintain these guidelines for the design of accessible buildings and facilities. ADAAG focuses mainly on buildings and site work and generally does not address conditions unique to public rights-of-way. Due to the need for accessibility guidelines specific to the public rights-of-way, the Access Board developed the PROWAG, which is the current set of guidelines for design of accessible features in public rights-of-way. These guidelines have been identified as a current best practice by the FHWA for elements not fully addressed by ADAAG.

MDT has officially adopted PROWAG for accessible design features on transportation projects following current best practice recommendations.

MDT has designed projects in accordance with the design guidelines referenced above since their adoption in 1991. MDT has officially adopted PROWAG for accessible design features on transportation projects following current best practice recommendations.

MDT maintains a compilation of detailed drawings in accordance with PROWAG for use on new construction or alteration projects. The drawings include technical information with respect to sidewalk and curb ramp dimensions, slopes, materials, and installation requirements. Additionally, project-specific details are commonly developed to address unique aspects of individual projects. MDT requires contractors to construct and ensure compliant features. During construction, MDT construction project managers ensure curb ramps, sidewalks, and detectable warning devices are installed according to the appropriate details.

MDT conducts regular reviews of plans and specifications during the design process. This process encompasses review of any ADA elements on the project to verify compliance with ADA criteria.

METHOD 24: DESIGN ADA FEATURES TO ALLOW CONSTRUCTION FLEXIBILITY.

Designing a pedestrian feature at the threshold of ADA requirements can cause difficulty in the field during construction. Without room for error or field fitment, the feature may inadvertently be constructed in exceedance of ADA thresholds, resulting in non-compliance. For example, a ramp cross slope designed to meet the 2% required maximum may be constructed at a slope of 2.1% due to a variety of unforeseen field conditions or construction methods. To avoid this difficulty, MDT strives to design ADA features to allow for construction flexibility.

METHOD 25: APPLY DOCUMENTED PROCESS TO DETERMINE TECHNICAL INFEASIBILITY.

In some situations involving improvements to existing infrastructure, it is infeasible to fully comply with ADA requirements within the scope limitations of the project. ADA standards and design guidelines recognize that terrain, right-of-way availability, underground structures, adjacent developed facilities, drainage, or the presence of a notable natural or historic feature may limit full ADA compliance. In these situations, compliance must be provided to the maximum extent feasible³.

MDT uses its technical infeasibility form to determine and document these conditions on each project, and the forms are subsequently revisited during any future project activities at the location. Cost is not a factor in determining feasibility, and technical infeasibility is not considered during compliance scoring. MDT's technical infeasibility form can be found in **Appendix E**. In all cases, MDT designs and constructs ADA features in compliance with ADA requirements to the maximum extent feasible.

³ See PROWAG R202.3.1 Existing Physical Constraints and R302.5.4 Physical Constraints; see 28 CFR 35.151(2) Exception for structural impracticability; see 2010 Standards for Titles II and III Facilities: 2004 ADAAG Section 202.3 Alterations.



MDT strives to maintain pedestrian accessibility during construction activities.

MDT strives to regularly remove snow and ice in order to maintain ADA accessibility on pedestrian facilities adjacent to MDT routes. MDT coordinates with local jurisdictions to complete winter maintenance activities.

METHOD 26: CONTINUALLY INCORPORATE CONSTRUCTION DATA COLLECTION INTO THE ADA DATABASE.

MDT monitors the installation of ADA features during construction and field personnel measure new features to determine conformance with the design plans. MDT performs quality control and quality assurance procedures on all newly collected information before outdated information is retired from the database.

METHOD 27: STRIVE TO MAINTAIN ACCESSIBILITY DURING CONSTRUCTION.

ADA implementing regulations (28 CFR 35.133(b)) allow for isolated temporary interruptions in service or access due to maintenance or repairs. During construction activities, MDT strives to maintain accessibility in a manner comparable to conditions prior to construction and adheres to guidance within the MUTCD for work zone compliance.

Operations and Maintenance

The MDT Maintenance Division is generally responsible for physical maintenance of MDT rights-of-way and facilities.

METHOD 28: IDENTIFY ADA ISSUES DURING REGULAR MAINTENANCE DUTIES.

Over the course of a year, ADA features may become damaged or worn as a direct result of maintenance activities or due to normal wear and weathering. For example, blades used during wintertime snow removal may damage detectable warning devices, and freeze/thaw cycles may cause pavement cracking resulting in trip hazards.

During the course of regular duties, MDT maintenance personnel identify and report any ADA issues and concerns to the appropriate MDT District and to the Office of Civil Rights. The level of correction is determined and addressed through maintenance activities or through an improvement project as warranted.

METHOD 29: CONDUCT WINTER MAINTENANCE, COORDINATE WITH LOCAL JURISDICTIONS, AND ENFORCE MAINTENANCE AGREEMENTS.

MDT is responsible for maintaining its rights-of-way in operable working condition throughout the year. During the winter, snow and ice buildup can limit the accessibility of an otherwise compliant pedestrian facility. MDT strives to regularly remove snow and ice and maintain ADA accessibility.

MDT sometimes enters into an agreement with a local jurisdiction to maintain sidewalks and pedestrian facilities adjacent to MDT routes. In other cases, local ordinances require adjacent landowners to maintain sidewalks. MDT coordinates with local jurisdictions to ensure maintenance responsibilities are defined.

3.4. BUILDING FACILITIES

In addition to its rights-of-way, MDT must also assure its building facilities are ADA compliant, including existing and newly constructed features. Building facilities include district and headquarters office buildings, rest areas, airports, maintenance buildings, and scale sites.

METHOD 30: SCORE BUILDING FACILITIES TO IDENTIFY ADA NEEDS.

Similar to its approach for right-of-way features, MDT uses a composite system to score its building facilities and assign points based on demand and ADA compliance. The process is summarized in **Figure 5** below.

A demand score for rest areas and MCS facilities is determined using annual average daily traffic (AADT) volumes. Similar to right-of-way features, a higher number of points are awarded for higher demand (indicated by AADT). Compliance scores are calculated by assigning a single point value to each non-compliant feature within the facility, including pedestrian access routes, curb ramps and blended transitions, detectable warning devices, pedestrian crossings, parking and passenger loading zones, protruding objects, pedestrian ramps, stairways, handrails, doorways and entrances, tables and counters, drinking fountains, sinks, water closets, telephones, and signage.

Composite scores for building facilities are calculated by multiplying the demand score by the compliance score. Sites with higher composite scores represent higher priorities. Facilities are ranked according to type and degree of public access, with separate priority lists for rest areas (higher priority) and other facilities (lower priority). Only inventoried sites are included in the priority ranking.

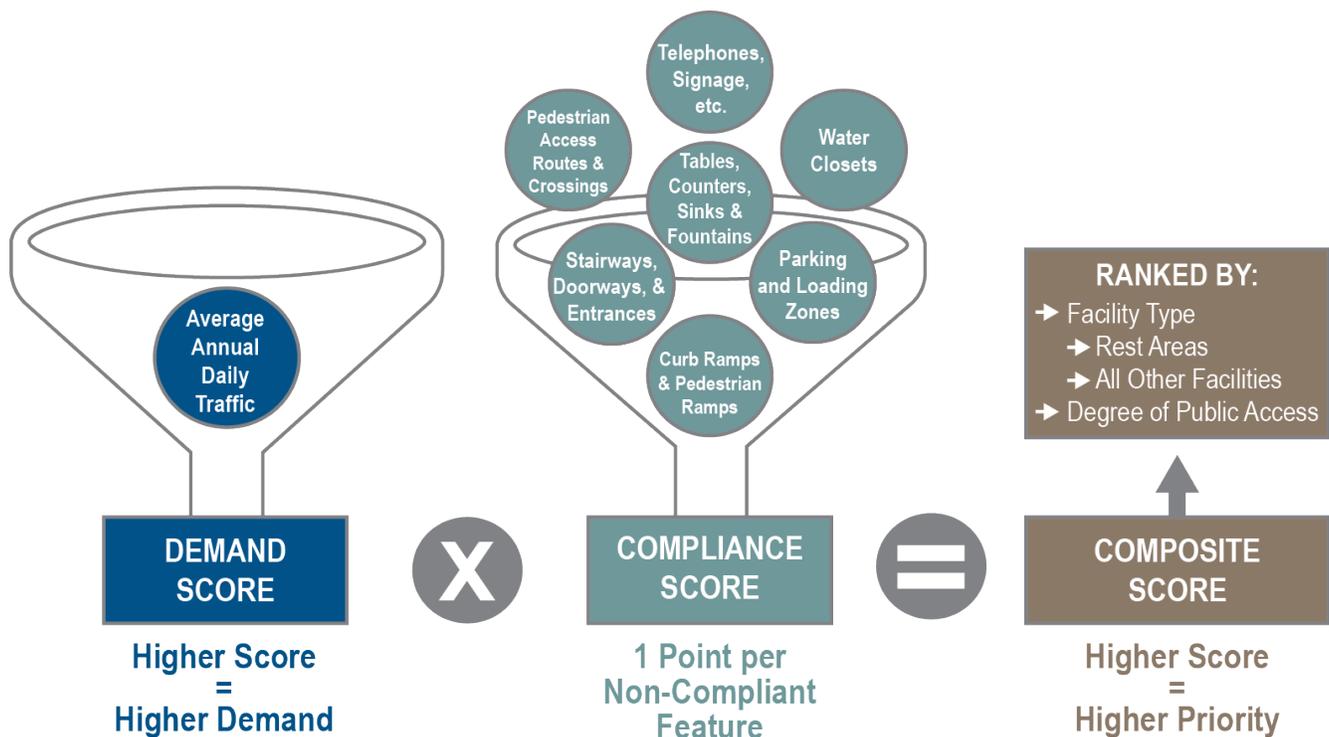


Figure 5: Building Facility Scoring Process



METHOD 31: PROVIDE ADA-COMPLIANT FEATURES WHEN DESIGNING, CONSTRUCTING, UPGRADING, AND MAINTAINING BUILDING FACILITIES.

MDT provides ADA-compliant features as appropriate within the scope of work for each building facility project.

The MDT Maintenance Division administers a long-range building program to address new construction or major rehabilitation of maintenance and office buildings, airports, and scale sites. MDT District staff and Maintenance Division staff identify and prioritize projects, and the Montana Department of Administration Architecture and Engineering Division provides design and construction administration and oversight. Funding from the State Special Revenue Account is set aside each fiscal year for MDT’s long-range building projects.

The MDT Maintenance Division also completes minor rehabilitation and repair projects to provide upgrades to interior spaces, including offices and restrooms; heating, ventilation, and air-conditioning systems; and exterior elements such as roofing, siding, and windows. These projects are addressed with the State Special Revenue funds as needs are identified.

Through a separate process, MDT develops rest area construction and rehabilitation projects under its Rest Area Program. As outlined in the *Montana Rest Area Plan*, projects are identified and prioritized according to health index scoring, network evaluation results, input from the Statewide Rest Area Prioritization Plan Committee and MDT Districts, and other factors. Projects are financed through dedicated rest area funding or via core program funding as nominated and agreed upon by the committee and the MDT District. Building facilities, parking areas, pedestrian routes, and signage are designed and constructed in compliance with ADA requirements.

METHOD 32: UPDATE FACILITY INVENTORY DATA AS NEW PROJECTS ARE COMPLETED.

MDT conducted statewide inventory of its building facilities as part of the 2015 inventory effort. More than 150 building facilities were inventoried to determine ADA compliance. MDT maintains an internal database of ADA facility features. MDT also maintains design information for all staff use, as available. As building facility construction, rehabilitation, and repair projects are completed, Office of Civil Rights, the Statewide Rest Area Prioritization Plan Committee, and MDT Information Services Division staff ensure MDT updates the facilities database to reflect the current status of ADA features.

TOTAL BUILDING FACILITIES	379
Facilities <u>Not</u> Inventoried	120
Facilities <u>Inventoried</u>	251
<i>MDT Office Facilities</i>	<i>14 of 15</i>
<i>Safety Rest Areas</i>	<i>62 of 68</i>
<i>Parking Areas</i>	<i>2 of 14</i>
<i>State Owned Airports</i>	<i>3 of 3</i>
<i>Maintenance Houses</i>	<i>143 of 143</i>
<i>MCS: Non-Staffed</i>	<i>4 of 104</i>
<i>MCS: Staffed</i>	<i>23 of 24</i>
Percent Complete	67.7%

*As of September 2021

3.5. SUMMARY OF METHODS

Table 1 provides a summary of the 32 ADA program methods discussed previously.

Table 1: ADA Program Methods

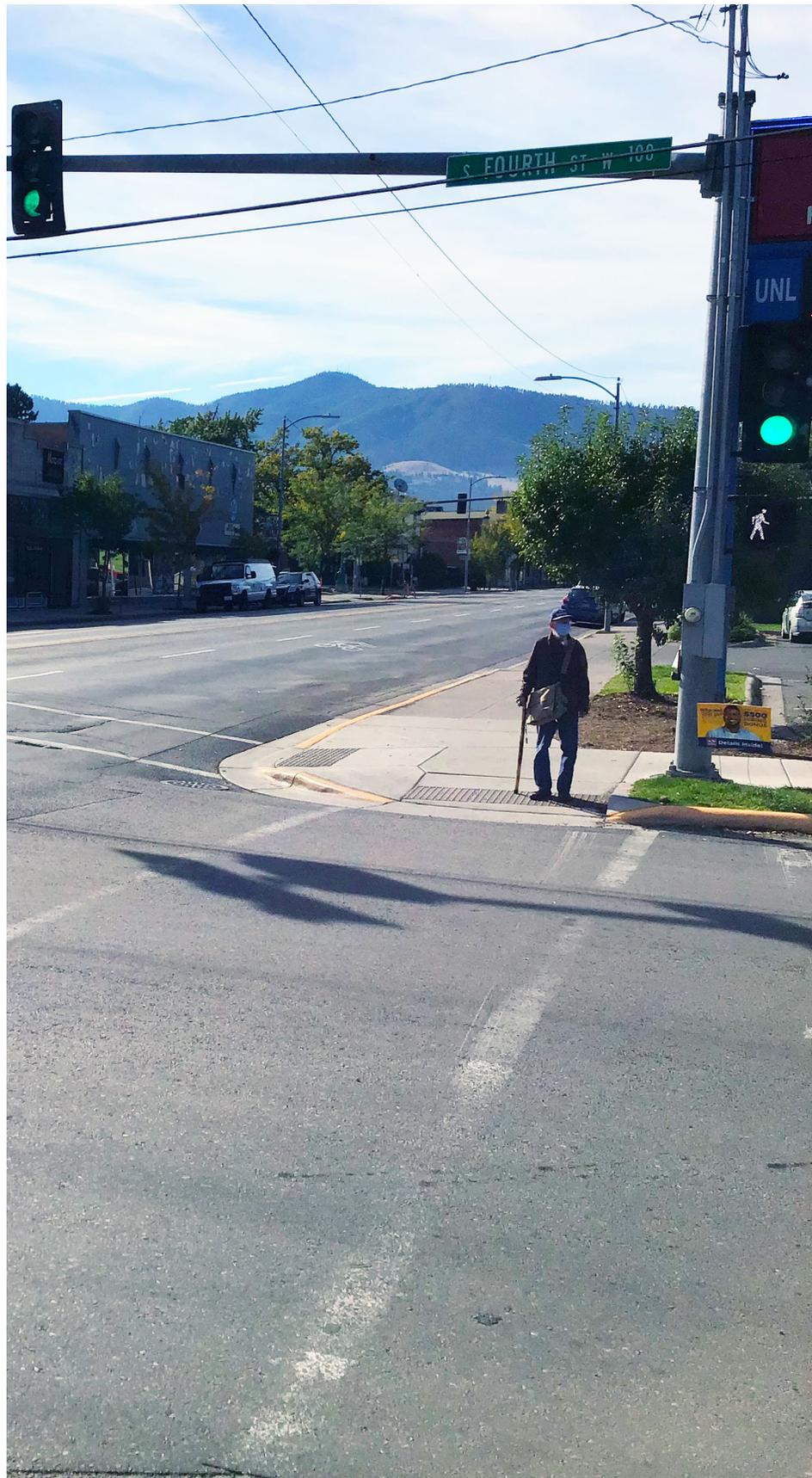
Category		Method	
Administration	1	Employ an external ADA coordinator.	
	2	Conduct outreach with transportation officials.	
	3	Coordinate with representatives of the disability community.	
	4	Provide public notice about ADA requirements.	
	5	Publish grievance procedures for resolution of ADA complaints.	
	6	Provide a mechanism for tracking non-grievance ADA communication and informal inquiries.	
	7	Provide written assurance guaranteeing non-discrimination.	
	8	Ensure personnel are appropriately trained regarding ADA requirements.	
Communications	9	Offer auxiliary aids and services to eliminate communication barriers.	
	10	Inform the public of accessible services, activities, and facilities and share information about ADA projects.	
Rights-of-Way	ADA Inventory	11	Maintain an inventory of existing ADA features.
		12	Consider ADA inventory system compatibility with other applicable data management systems.
		13	Score rights-of-way features to identify critical ADA needs.
		14	Identify projects using risk-based assessment of demand and compliance scoring, in combination with safety performance, proximity to programmed projects, local planning, and public feedback.
	Project Identification	15	Consider ADA compliance using an asset management method.
		16	Determine available funding sources.
		17	Identify level of ADA effort associated with project type.
		18	Consider project factors and opportunities to enhance ADA project delivery.
		19	Coordinate with partner agencies to identify local projects and future development activities.
	Design and Construction	20	Establish and document maintenance responsibility.
		21	Consider risk to determine appropriate project delivery method.
		22	Assign appropriate staff to design and review ADA documents.
		23	Design ADA improvements in accordance with applicable MDT design standards and federal regulations.
		24	Design ADA features to allow construction flexibility.
		25	Apply documented process to determine technical infeasibility.
		26	Continually incorporate construction data collection into the ADA database.
		27	Strive to maintain accessibility during construction.
	Operations & Maintenance	28	Identify ADA issues during regular maintenance duties.
		29	Conduct winter maintenance, coordinate with local jurisdictions, and enforce maintenance agreements.
Building Facilities	30	Score building facilities to identify ADA needs.	
	31	Provide ADA-compliant features when designing, constructing, upgrading, and maintaining building facilities.	
	32	Update facility inventory data as new projects are completed.	



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CHAPTER 4: PLAN AND SCHEDULE

MDT is committed to eliminating accessibility barriers for individuals with disabilities within its programs, rights-of-way, and building facilities. As required under 28 CFR 35.150(d)(3), MDT must specify a schedule for taking necessary steps to achieve ADA compliance. An implementation plan and schedule provide a timeline for addressing deficiencies in policies and procedures, augmenting missing or incomplete inventory data, and remediating physical barriers identified through inventory.





Given the number of physical barriers across the state of Montana, the associated cost for improvements, and available funding mechanisms, full compliance is anticipated to be achieved over a period of years. For each year of implementation, MDT develops a plan annually outlining specific actions to be completed during the year. The action plan contained in **Appendix F** outlines:

- rights-of-way projects programmed in the five-year STIP containing ADA improvements (including both stand-alone projects and within highway project scopes),
- facilities projects planned for the upcoming year,
- inventory activities planned for the upcoming year (if any), and
- program administration/communications actions planned for the upcoming year.

Inventory of sidewalks, shared use paths, bus stops, and transit linkages may be considered in future years as funding allows. Sidewalks are upgraded as part of ADA improvement projects.

At the end of each year, MDT completes a program review and an annual update report summarizing completed actions and describing any changed conditions. The report enables MDT to track progress in removing accessibility barriers and achieving ADA compliance. A summary of the progress MDT has made since implementation of the previous plan is contained in **Appendix G**.

Every five years, MDT also reviews the entire MDT *ADA Transition Plan* to ensure it accurately reflects the MDT ADA program methodology and procedures and updates it via limited amendment as necessary. The steps MDT takes to implement the *ADA Transition Plan* is shown in **Figure 6**.

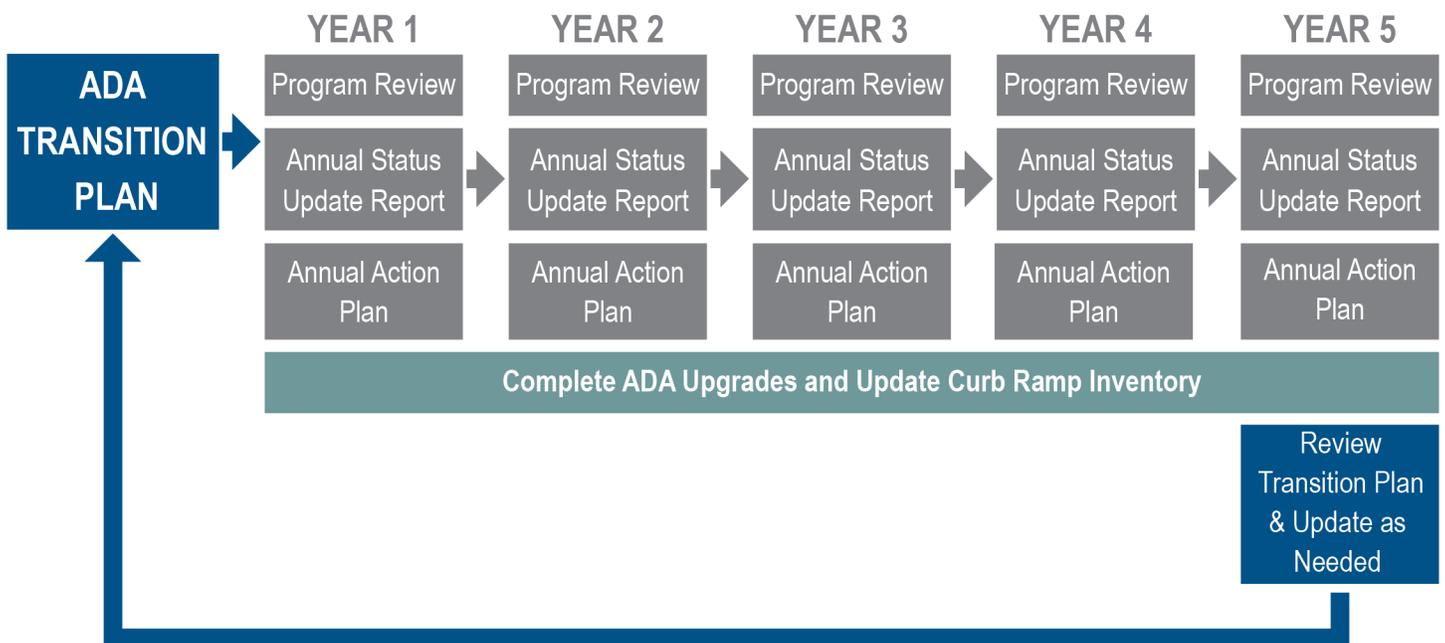


Figure 6: ADA Transition Plan Implementation Process

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REFERENCES

- ¹ Section 504 of the Rehabilitation Act, Public Law 93-112, 1973.
- ² Americans With Disabilities Act of 1990, Public Law 101-336, 1990.
- ³ Code of Federal Regulations, Title 28, Part 35 – Nondiscrimination On The Basis of Disability in State and Local Government Services, 2021.
- ⁴ MDT, Montana Traffic Engineering Manual, 2009.
- ⁵ MDT, Maintenance Operations and Procedures Manual, 2009.
- ⁶ MDT, Design Memos, 2010-2016.
- ⁷ MDT, Montana Rest Area Plan, 2014.
- ⁸ MDT, Road Design Manual and Geometric Design Standards, 2016.
- ⁹ MDT, TranPlanMT, 2017.
- ¹⁰ MDT, Shared Use Paths Inventory and Detailed Maintenance Plan, 2018.
- ¹¹ MDT, Montana Pedestrian & Bicycle Plan, 2019.
- ¹² MDT, Detailed Drawings, 2020.
- ¹³ MDT, Standard Specifications, 2020.
- ¹⁴ MDT, Special Provisions, 2013.
- ¹⁵ MDT, Bus Stop Review/Approval Requirements, No Date.
- ¹⁶ MDT, Bus Stops/Parklets/Pedlets, 2020.
- ¹⁷ MDT, Communications Guidelines, No Date.
- ¹⁸ MDT, Public Involvement Plan, No Date.

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Alternative accessible formats of this document will be provided on request. Persons who need an alternative format should contact the Office of Civil Rights, Department of Transportation, 2701 Prospect Avenue, PO Box 201001, Helena, MT 59620. Telephone 406-444-5416 or Montana Relay Service at 711.

This document is printed at state expense. Information on the cost of producing this publication may be obtained by contacting the Department of Administration.

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APPENDIX A:

Summary of MDT Responsibilities under Title II of the ADA

Summary of MDT Responsibilities under Title II of the ADA

Implementing Regulation	Responsibilities	Method or Section
28 CFR 35.105	<p><u>Self-Evaluation</u></p> <ul style="list-style-type: none"> Evaluate current services, policies, and practices and make any necessary modifications to meet ADA requirements. Provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the self-evaluation process by submitting comments. Maintain a list of interested persons consulted, a description of areas examined and any problems identified, and a description of any modifications made. 	Methods 3 and 11
28 CFR 35.106	<p><u>Notice</u></p> <ul style="list-style-type: none"> Make ADA information available to the public regarding applicability to MDT services, programs, and activities. 	Method 4
28 CFR 35.107	<p><u>Responsible Employee / Grievance Procedures</u></p> <ul style="list-style-type: none"> Designate a responsible employee to coordinate ADA efforts; provide the ADA coordinator's name, office address, and telephone number. Adopt and publish grievance procedures providing for prompt and equitable resolution of complaints. 	Methods 1 and 5
28 CFR 35.130 28 CFR 35.149	<p><u>General Prohibitions Against Discrimination</u></p> <ul style="list-style-type: none"> Do not exclude disabled persons from participation in or deny benefits of MDT services, programs, or activities. Do not discriminate on the basis of disability. 	Method 7 Section 1.1
28 CFR 35.133	<p><u>Maintenance</u></p> <ul style="list-style-type: none"> Maintain facilities and equipment required to be accessible to persons with disabilities in operable working condition. 	Methods 20, 27, 28, and 29
28 CFR 35.150	<p><u>Existing Facilities</u></p> <ul style="list-style-type: none"> Operate each service, program, or activity in a manner accessible to and usable by individuals with disabilities. Alter existing facilities or construct new facilities as necessary to comply with ADA requirements. Develop a transition plan outlining steps necessary to complete structural changes to facilities. 	Methods 10, 28 and 31
28 CFR 35.151	<p><u>New Construction and Alterations</u></p> <ul style="list-style-type: none"> Design, construct, and alter public facilities in a manner readily accessible to and usable by individuals with disabilities, unless structurally impracticable. Provide curb ramps or other sloped areas at any intersection having curbs or other barriers to entry from a street level pedestrian walkway. 	Methods 23, 25 and 31
28 CFR 35.160 28 CFR 35.161	<p><u>Communications/Telecommunications</u></p> <ul style="list-style-type: none"> Ensure effective communications with disabled persons. Provide appropriate auxiliary aids and services to afford disabled individuals an equal opportunity to participate in and enjoy the benefits of MDT services, programs, and activities. 	Methods 3, 4, 9 and 10
28 CFR 35.163	<p><u>Information and Signage</u></p> <ul style="list-style-type: none"> Provide information about the existence and location of accessible services, activities, and facilities. Provide signage at all inaccessible building entrances directing users to an accessible entrance that is denoted with the international symbol for accessibility. 	Method 10

Note: Additional responsibilities detailed in 28 CFR Section 35 (e.g., related to employment discrimination) are not discussed in the MDT ADA Transition Plan.

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APPENDIX B:

Public and Stakeholder Involvement

APPENDIX B1: ADA Transition Plan
Survey

APPENDIX B2: Stakeholder Outreach -
May 2021

APPENDIX B3: Stakeholder Outreach -
October 2021

APPENDIX B4: Public Comments

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APPENDIX B1:

ADA Transition Plan Survey

Appendix B1-a: Survey Summary

Appendix B1-b: Survey

Appendix B1-c: Survey Results

Appendix B1-d: Survey Email Announcement

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APPENDIX B1-a:

Survey Summary

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Montana Department of Transportation



April 21, 2021

B1-a: Survey Summary

Prepared for:

Montana Department of Transportation



Prepared by:
**Robert Peccia
and Associates**

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SURVEY SUMMARY

1.0 Introduction

The Montana Department of Transportation (MDT) has engaged Robert Peccia and Associates (RPA) to update the 2016 *Americans with Disabilities Act (ADA) Transition Plan* which directs the department's efforts to provide an accessible transportation system within the state of Montana. The purpose of the plan is to provide guidance for removal of accessibility barriers in the public right-of-way on State of Montana maintained routes and in MDT's public programs and services. The plan provides an overview of MDT's external ADA program, outlines MDT's mission and ADA policy, and identifies methods to assist MDT in complying with ADA regulations. An update to the plan is needed to ensure it provides communication of MDT practices and Federal Highway Administration (FHWA) guidance and requirements and that it continues to provide a consistent, repeatable, recognized methodology to be used as a tool for MDT efforts to remove accessibility barriers.

To assist in identifying needs and areas of focus for the plan update, an online survey was developed. The survey was intended to collect opinions and feedback about the accessibility of MDT streets, facilities, and programs. This memorandum provides a summary of the survey and its results.

1.1. Survey Distribution and Format

The survey was announced to the public on March 31 and closed on April 16, 2021. A link to the survey was emailed to representatives from key stakeholder groups to distribute to their members. An announcement was also posted to the plan website with a link to the survey. This method of distribution was intended to maximize participation rather than provide statistically significant results applicable to the state population or the disability community as a whole.

The survey was created using the SurveyMonkey platform and consisted of 17 questions. Respondents were asked to rank and provide feedback on perceived accessibility barriers relating to MDT facilities, MDT programs, general street accessibility, and pedestrian issues. Participants were also asked to provide basic demographic data including their geographic location, age group, and disability status in addition to their familiarity with the 2016 ADA Transition Plan. Opportunities for open-ended responses and general feedback were also provided throughout the survey. A copy of the survey can be found in **Appendix A**.

2.0 Survey Results

A total of 69 responses were received for the survey. To ensure confidentiality, all answers were anonymous. All questions were optional and could be skipped at any time, and therefore the number of responses varied for each question. Incomplete or skipped responses were not considered in the presentation of results for ranked questions. A summary of all results and open-ended responses is provided in **Appendix B**.

2.1. Pedestrian Issues

1: WHAT ISSUES ARE MOST IMPORTANT TO YOU AS A PEDESTRIAN? (RANK 1-7)

A total of 59 complete responses were received for the first question. **Figure 1** shows the number of results received for each option categorized by the ranking chose by the participant. A composite score is also shown on the graph for each option, which was calculated using a weighted average. Higher ranked options received higher scores, for a maximum composite score of seven.

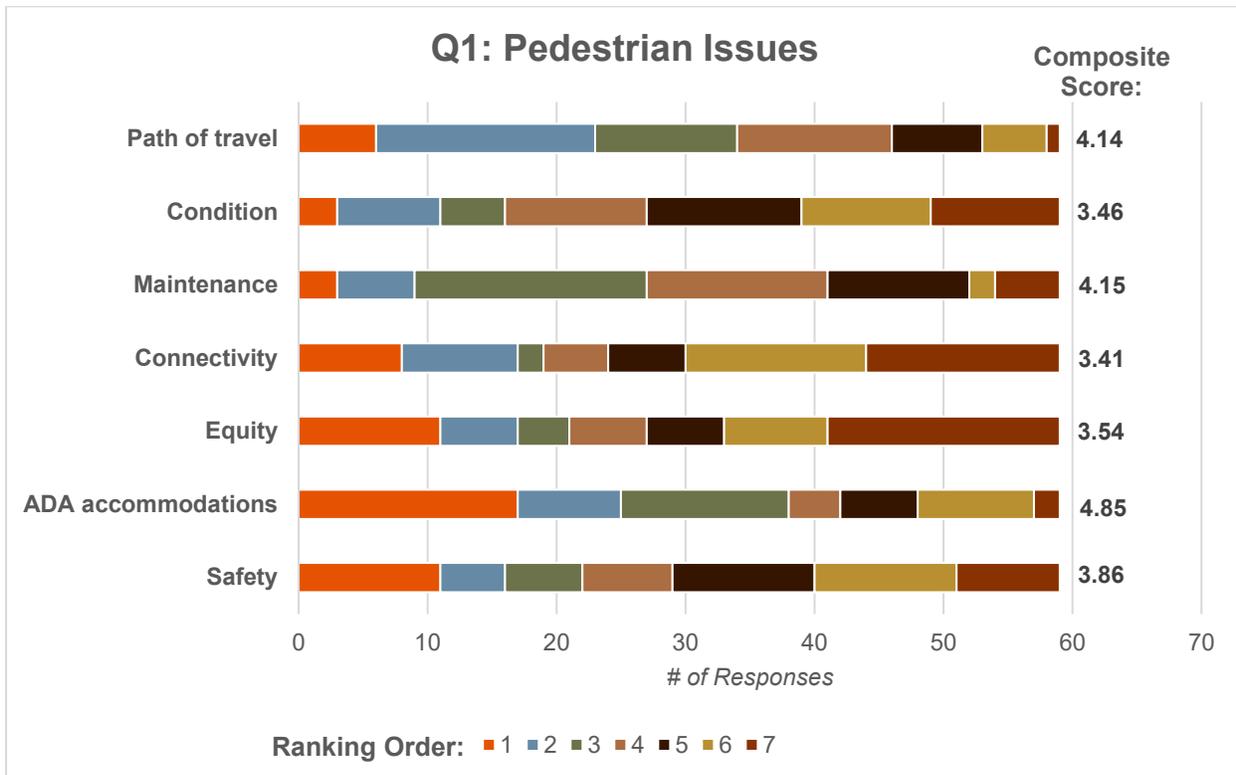


Figure 1: Question #1 Results

As seen in **Figure 1**, ADA accommodations received the highest composite score (4.85), followed by maintenance (4.15) and path of travel (4.14). However, all options scored similarly with composite scores ranging from 3.46 to 4.85 out of 7 points. This indicates that all of the identified pedestrian issues are important, and no single issue is particularly important compared to the others.

2.2. Street Accessibility

2: IN WHAT AREAS DO YOU THINK MDT NEEDS ACCESSIBILTY IMPROVEMENTS? (RANK 1-5)

Figure 2 presents the results from this question with a similar composite score provided for each option. A total of 58 complete responses were provided for this question. As seen in the figure, the option “pedestrian pathways, sidewalks, or curb ramps” scored the highest, with a composite score of 4.19 out of 5 possible points. Nearly 60 percent of respondents identified pedestrian pathways as the highest priority area for accessibility improvements. On-street parking and

signage/wayfinding assistance received the lowest composite scores indicating a potentially lesser need for focused improvements in these areas.

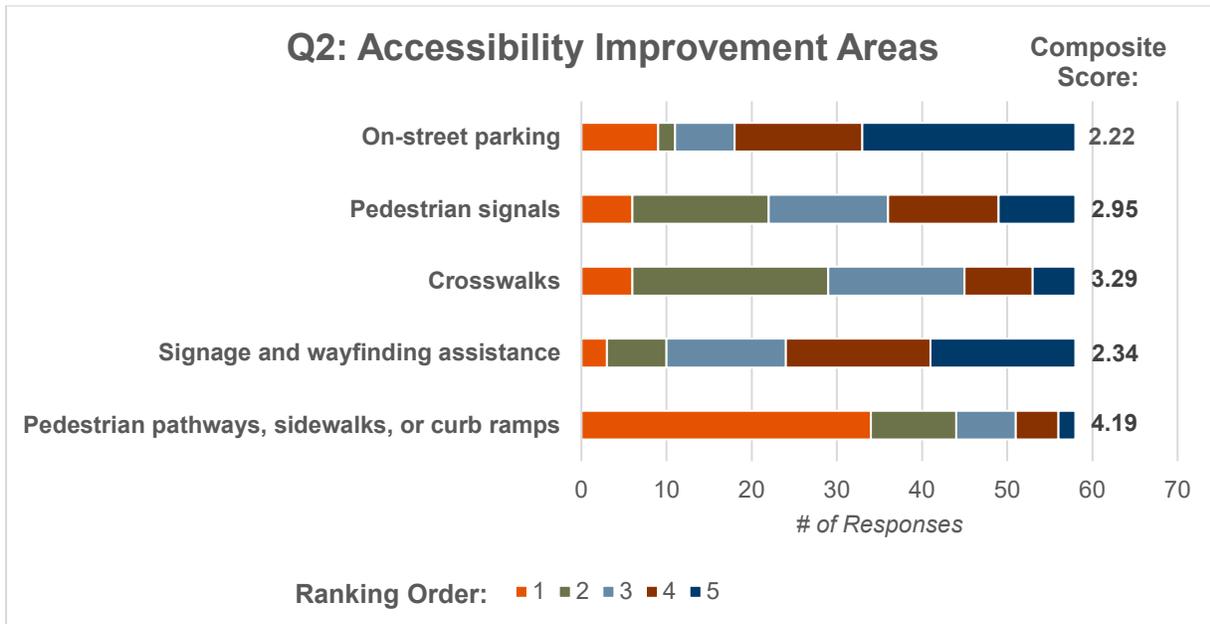


Figure 2: Question #2 Results

3: WHAT SUGGESTIONS DO YOU HAVE FOR IMPROVEMENT?

This question was open ended to allow for more specific feedback. A total of 23 respondents offered comments, which are provided in **Appendix B**. A summary of those comments is provided in **Table 1**.

Table 1: Street Accessibility - Suggestions for Improvement

Category	Comments
Crosswalks	There is a need for well-marked and well-lit crosswalks. Pedestrian-activated signals and high visibility signage are desired at locations with high volumes of traffic and near schools.
Pedestrian Signals	Accessible pedestrian signals are helpful. Audible cues such as announcing the street name and notifying a pedestrian when it is safe to cross are valuable.
Sidewalks	There is a need for additional sidewalk in some locations for better access to goods and services. It is desirable to provide sidewalks on both sides of a roadway, not just one side.
Parking	There is a general lack of accessible on-street parking. Some parking spaces that are meant to be accessible do not have wide enough aisles or accessible curb ramps. On-street parking of large trucks and vehicles with trailers is a concern.
Prioritize Pedestrians	There is a desire for a more "complete street" approach that accommodates pedestrians and considers the needs of all users, including disabled individuals. ADAAG and PROWAG are recommended to be adopted by local municipalities, but it is also recognized that sometimes meeting minimum standards is not enough. Participating in walk audits with the disability community would be beneficial to ensure appropriate design.
Maintenance	Improved winter maintenance of pedestrian facilities is desired. General maintenance of sidewalks and crosswalk paint is also desired. If adjacent property owners are responsible for maintaining sidewalks, providing funding and support for elderly and disabled property owners is encouraged.

2.3. Facility Accessibility

4: IN WHAT AREAS DO YOU THINK MDT NEEDS ACCESSIBILITY IMPROVEMENTS? (RANK 1-5)

Figure 3 presents the results from this question with a composite score also provided for each option. A total of 45 complete responses were received for this question. As seen in the figure, rest areas scored the highest with a composite score of 4.02 out of 5 possible points. Nearly 65 percent of respondents identified rest areas as the highest priority MDT facility for accessibility improvements. The Helena Headquarters building and MDT maintenance shops received the lowest composite scores indicating a potentially lesser need for focused improvements in these areas.

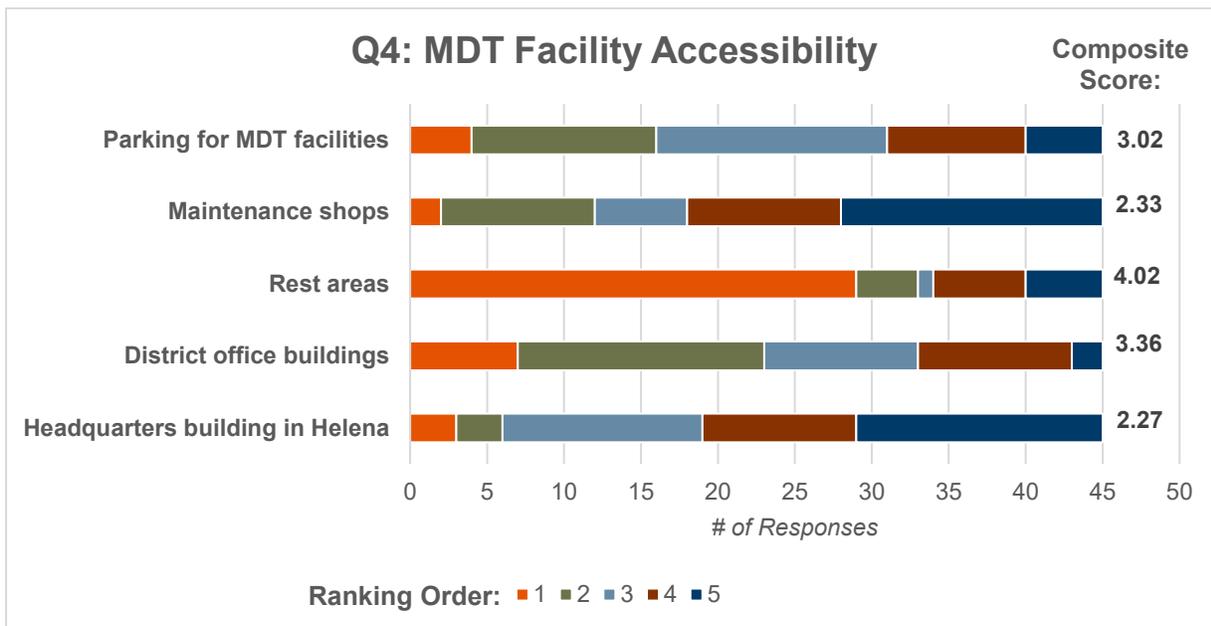


Figure 3: Question #4 Results

5: WHAT SUGGESTIONS DO YOU HAVE FOR IMPROVEMENT?

This question was open ended to allow for more specific feedback. A total of 13 respondents offered comments, which are provided in **Appendix B**. A summary of those comments is provided in **Table 2**.

Table 2: Facility Accessibility - Suggestions for Improvement

Category	Comments
Rest Areas	There is a desire for rest areas to be open year-round. There are some safety concerns at the rest area pet relief areas. Increased maintenance of ADA facilities is desired.
Standards	Ensure ADA standards are being met at all publicly accessible, state-owned locations. It is important to focus on locations with high pedestrian traffic and ensure improvements are not concentrated in one area of the state.
Parking	Parking lots at MDT facilities should be paved and/or have an accessible walkway. Standard ADA parking spaces are generally not big enough to maneuver modern mobility equipment.
Building Facilities	Hallways and restrooms should be designed with the disabled user in mind. Signage indicating locations of ramps and accessible entryways is desirable.

6: WHAT SHOULD BE THE HIGHEST PRIORITY TO IMPROVE PHYSICAL ACCESS TO MDT FACILITIES? (RANK 1-4)

Figure 4 presents the results from this question with a composite score provided for each option. A total of 50 complete responses were received for this question. As seen in the figure, curb ramps received a composite score of 3.26 out of 4 possible points with nearly 65 percent of respondents selecting curb ramps as the highest priority feature to improve access to MDT facilities. Crosswalks and pedestrian signals scored the lowest, comparatively, but may still be considered to improve overall network connectivity to MDT facilities.

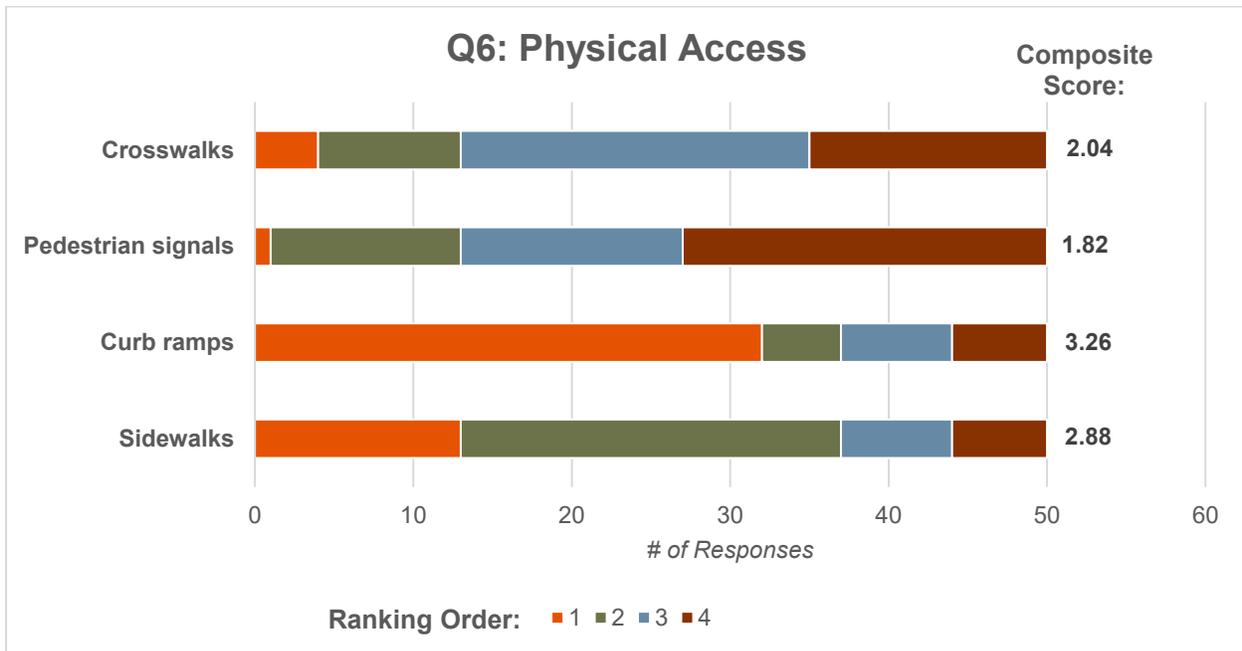


Figure 4: Question #6 Results

2.4. Program Accessibility

7: IN WHAT AREAS DO YOU THINK MDT NEEDS ACCESSIBILITY IMPROVEMENTS? (SELECT ALL THAT APPLY)

For this question, participants were asked to select all items they felt MDT could improve to provide better accessibility to the public including communication methods and accessibility of published materials. A total of 53 responses provided input for this question. About five percent of respondents selected eight or more of the options. The majority of respondents selected five or fewer areas of improvement. **Figure 5** shows the results for this question. As the figure shows, maps were the most commonly selected option followed by public involvement methods/materials and published data. Only three individuals identified the MDT newsletter as an area of improvement, potentially suggesting limited use of or access to the newsletter.

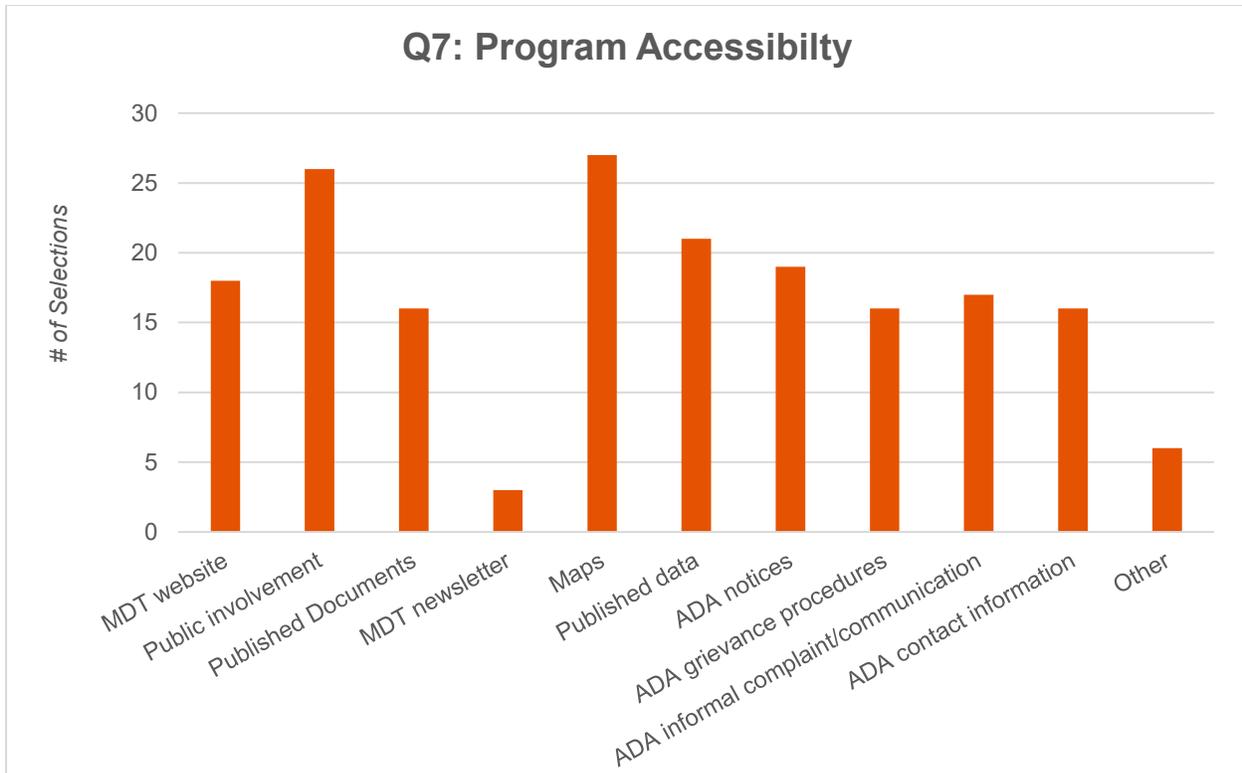


Figure 5: Question #7 Results

8: WHAT SUGGESTIONS DO YOU HAVE FOR IMPROVEMENT?

The ‘Other’ option in Question #7 allowed respondents to specify other areas of improvement not included in the provided options. Those comments can be viewed in **Appendix B** and are incorporated in **Table 3** along with suggestions given in Question #8 (10 total responses received).

Table 3: Program Accessibility - Suggestions for Improvement

Category	Comments
Communication	Increased communication and coordination with local municipalities is encouraged. Walk audits are also encouraged to ensure designs are accessible; sometimes minimum standards are not sufficient.
Funding	There is a general perception that funding could be better spent on improvements rather than unnecessary public involvement and meetings.
Parking Enforcement	It was suggested that MDT and municipalities use an accessible parking enforcement smartphone application (similar to Parking Mobility).
Program Accessibility	It was noted that crash data, websites, and published documents are not always accessible, especially for the visually impaired and non-technical public.

2.5. ADA Transition Plan

9: ARE YOU FAMILIAR WITH THE 2016 MDT ADA TRANSITION PLAN?

This question was intended to gauge familiarity with the 2016 Transition Plan. A total of 59 individuals answered this question. As shown in **Figure 6**, about one third of respondents had viewed the 2016 plan to some degree while over half of the respondents had not read it.

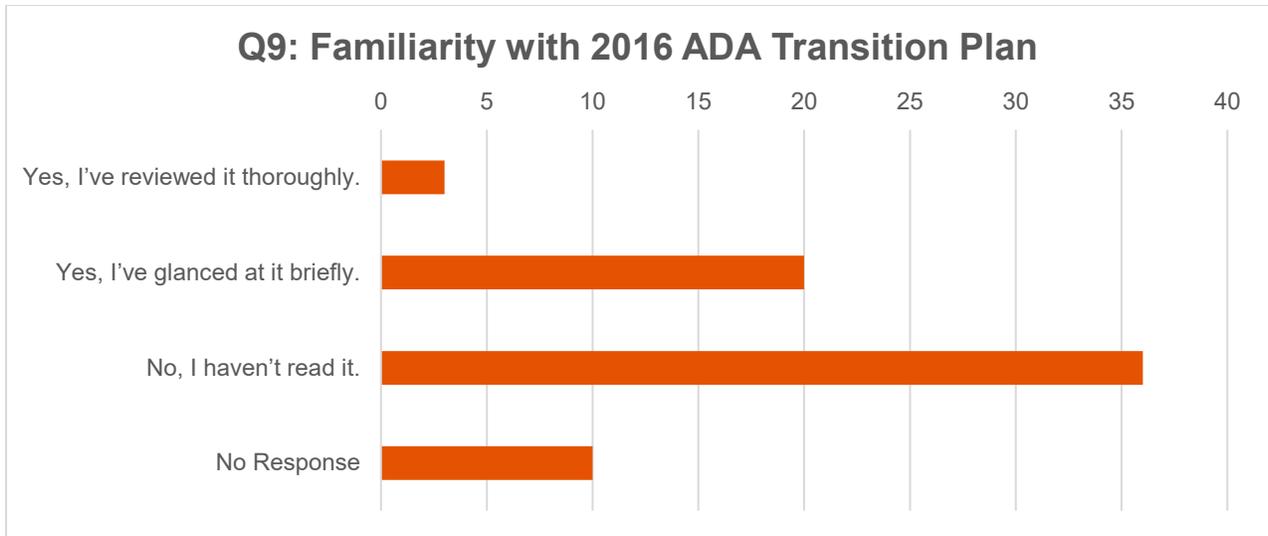


Figure 6: Question #9 Results

10: DO YOU FEEL THE MDT ADA TRANSITION PLAN ADDRESSES ALL NECESSARY ASPECTS OF ACCESSIBILITY FOR MDT PUBLIC RIGHTS-OF-WAY, FACILITIES, AND PROGRAMS?

As a follow-up to question #9, this question was intended to determine whether the 2016 Plan adequately addressed accessibility needs and, if not, have participants identify additional areas for improvement. A total of 57 individuals offered a response to this question. As **Figure 7** shows, about 10 percent of respondents felt that the 2016 plan addresses all aspects of accessibility while about 15 percent felt that it did not. Two out of three participants that had thoroughly reviewed the plan indicated it did not address all aspects of accessibility. Areas for MDT to address further included larger wheelchair loading zones and ensuring standards are up to date. Of those who indicated they've glanced through the plan, about 35 percent felt it addressed all necessary aspects while 20 percent did not. Suggestions for areas to address further are summarized in **Table 4**.

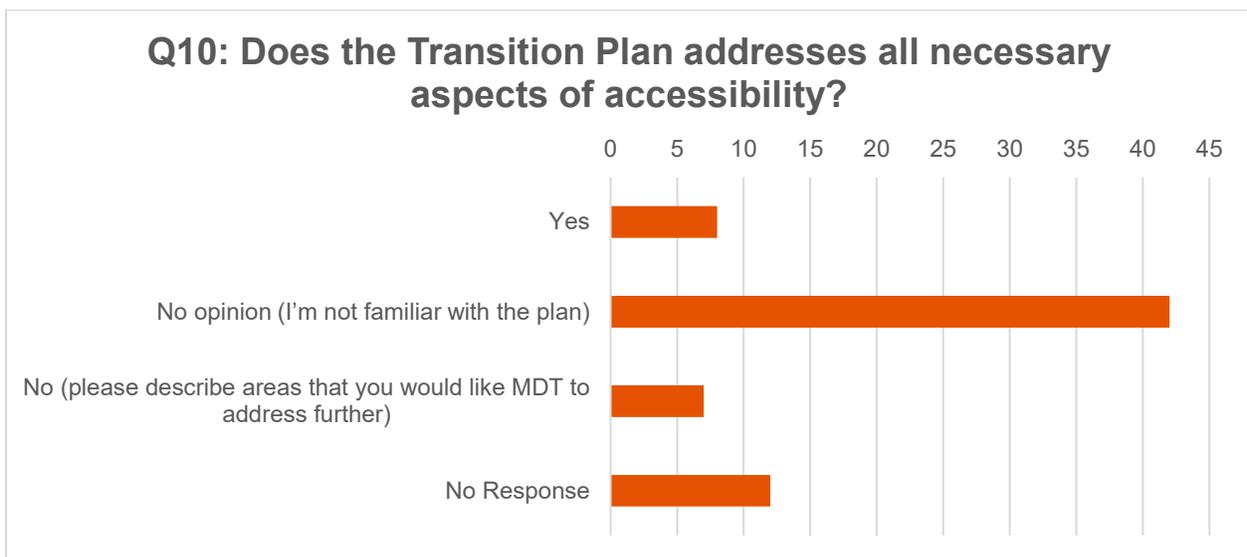


Figure 7: Question #10 Results

Table 4: ADA Transition Plan - Suggestions for Improvement

Category	Comments
Communication	Coordination with representatives of the disability community and external ADA experts could be refined/improved. Encourage local municipalities to adopt accessibility standards and pursue upgrades.
ADA Assets	It is desirable to address consistency and accessibility of pedestrian signals, curb ramps, parking roundabouts, transit, and other public transportation options.
Connectivity	Consider connectivity of pedestrian routes when upgrading facilities. Sometimes there is greater focus on meeting standards than there is on making connected routes accessible.
Education	More education on ADA design and accessible options is desired.

2.6. Demographics

11: WHICH OF THE FOLLOWING BEST DESCRIBES YOU? (SELECT ALL THAT APPLY)

Figure 8 shows how respondents identified themselves as pertaining to the disability community. A total of 56 respondents answered this question. About 20 percent of all respondents indicated that they are an individual with a disability. Nearly 40 percent of survey participants identified as a family member, friend, or caregiver to a person with a disability and nearly 50 percent identified as an advocate for people with disabilities. Note, some respondents selected multiple options. About 20 percent of respondents selected “other” and noted that they were government employees, ADA coordinators, advocates for senior citizens, and private citizens.

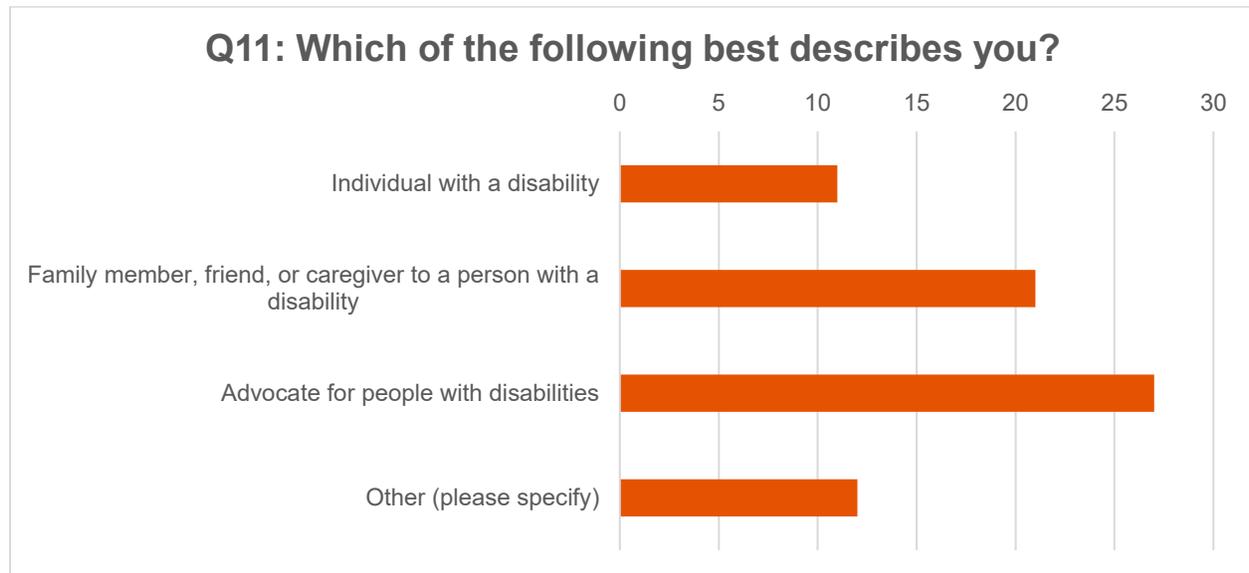


Figure 8: Question #11 Results

12: WHAT IS YOUR DISABILITY STATUS? (SELECT ALL THAT APPLY)

A total of 55 individuals provided a response to this question. As **Figure 9** shows, individuals with all types of disabilities were represented in the survey. Ambulatory (20 percent), independent living (15 percent), and self-care (11 percent) difficulties were the most common with vision, cognitive, and hearing difficulties each being identified by about 8 percent of survey respondents. About 65 percent of all respondents indicated that they did not have a disability while about 7 percent preferred not to specify.

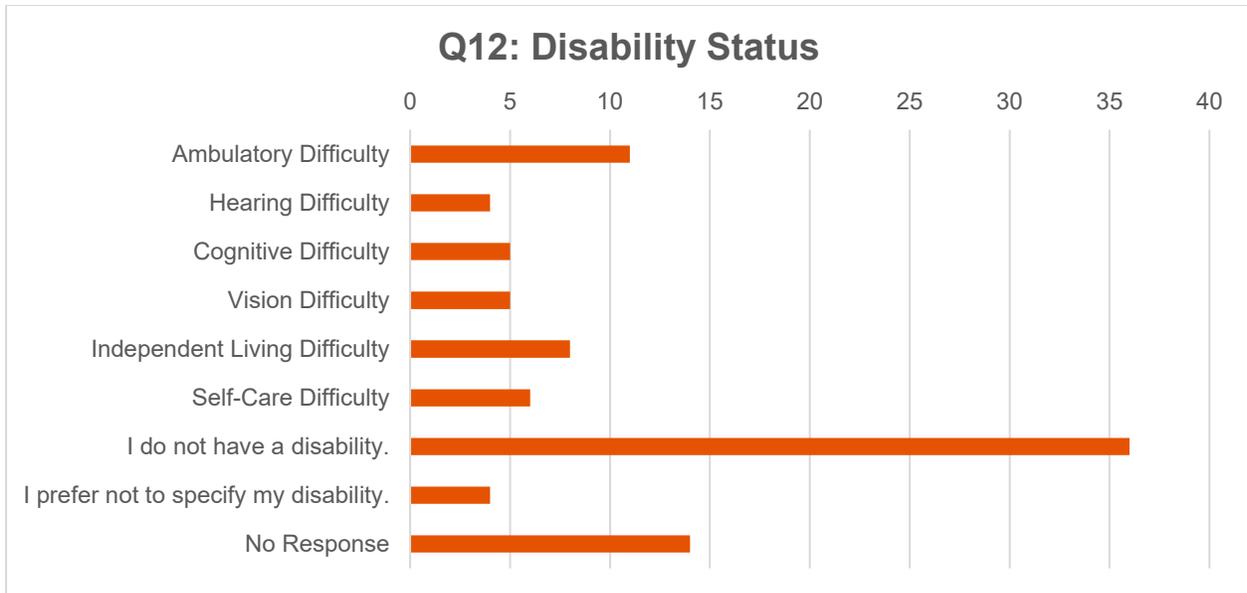


Figure 9: Question #12 Results

13: WHAT IS YOUR ZIP CODE?

A total of 53 respondents indicated their zip code. Overall, responses were received from individuals in 33 different cities or towns in 23 of Montana’s 56 counties. The greatest number of respondents were from Cascade (4), Lewis and Clark (3), Missoula (3), and Yellowstone (3) counties, with the communities of Great Falls (3), Helena (2), Missoula (2), and Billings (2) having the largest representation. These results indicate that information received from this survey were not concentrated in specific geographic areas and are, to some degree, representative of the entire state. **Figure 10** shows the county that each respondent lives in based on the zip code indicated in the survey.

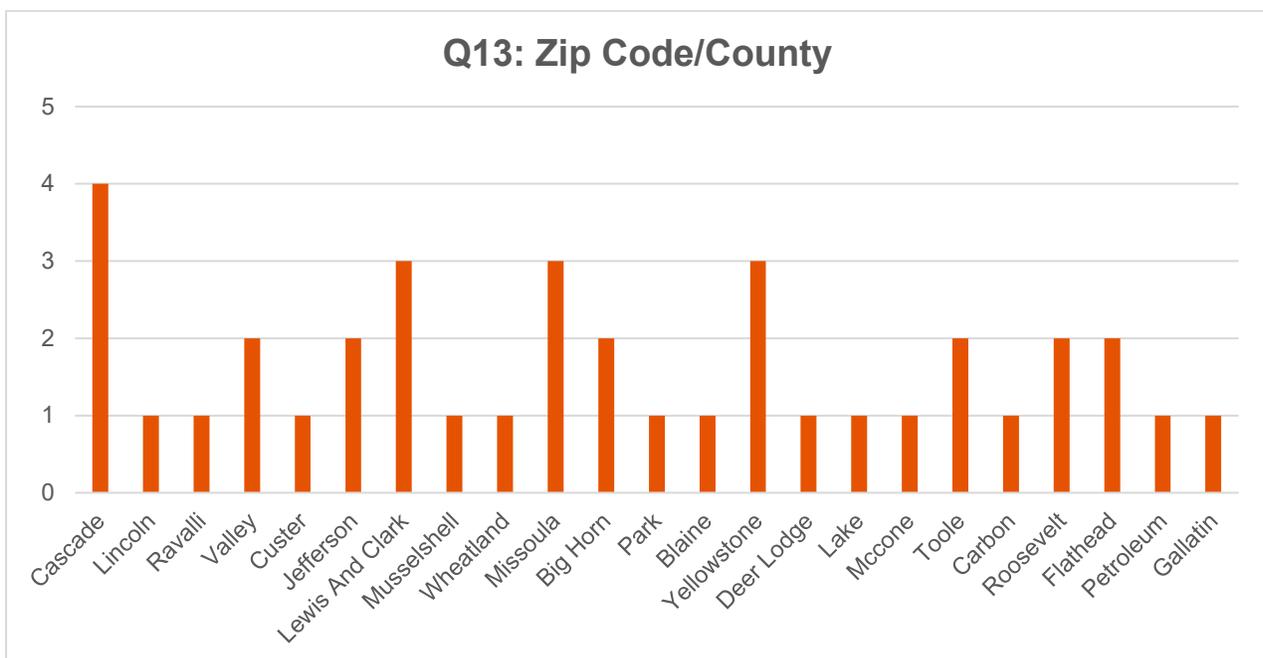


Figure 10: Question #13 Results

14: PLEASE SELECT YOUR AGE GROUP.

Figure 11 shows the age groups represented by survey respondents. A total of 57 respondents provided their age group. None of the respondents were under the age of 18 and about 12 percent of respondents were over the age of 65. Most respondents were in the 35 to 50 age group (39 percent), followed by the 51 to 65 age group (35 percent).

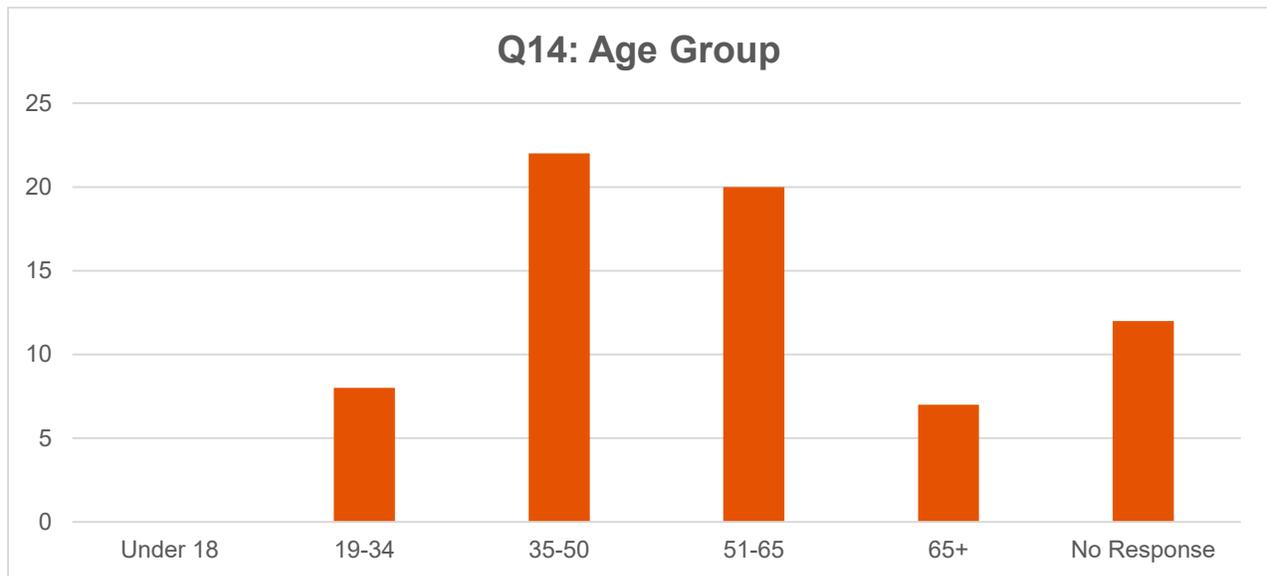


Figure 11: Question #14 Results

15: WHAT TYPE OF COMMUNITY SETTING DO YOU LIVE IN?

Figure 12 shows the community settings where respondents reside. A total of 57 respondents indicated their community setting. Most participants indicated they live in a city (41 percent) or small town (25 percent). Fewer respondents reported living in the urban fringe (4 percent) or country (13 percent).

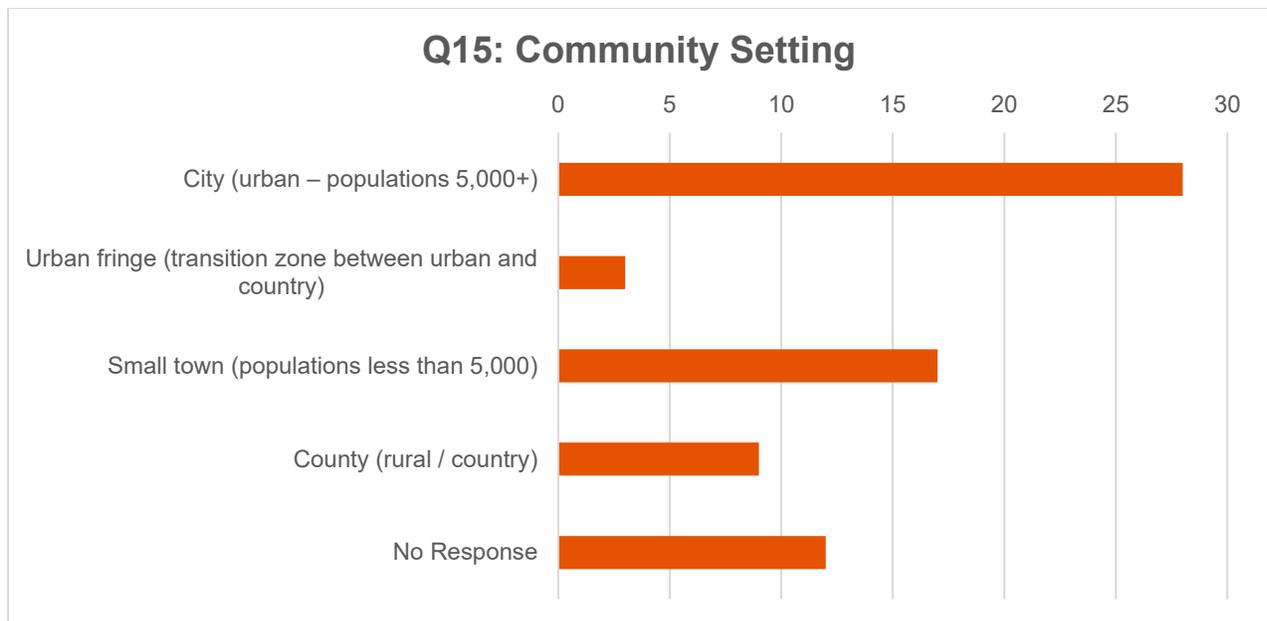


Figure 12: Question #15 Results

2.7. Additional Feedback

16: PLEASE PROVIDE AN OTHER COMMENTS RELATING TO THE ADA TRANSITION PLAN YOU WOULD LIKE MDT TO CONSIDER.

This question was open ended to allow respondents to offer any additional feedback. A total of 6 respondents offered comments, which are provided in **Appendix B**. Three respondents indicated in the comments that they were either not familiar enough with the plan or specific MDT facilities to provide additional feedback. The other comments indicated the need for ADA compliance, accessible pathways, and marked crosswalks in small towns and rural communities. The need for wider accessible parking spaces was also reiterated in the comments.

17: IF YOU WOULD LIKE TO JOIN THE ADA TRANSITION PLAN EMAIL LIST, PLEASE PROVIDE YOUR NAME AND EMAIL ADDRESS.

This question offered participants the opportunity to join the plan email list so they can be notified when plan updates are available. A total of 11 participants provided contact information and will be added to the email list.

ADA TRANSITION PLAN UPDATE

Montana Department of Transportation



APPENDIX B1-b:

Survey

2021 ADA Transition Plan Update

WELCOME!

The Montana Department of Transportation (MDT) is updating its *Americans with Disabilities Act (ADA) Transition Plan*, which was previously completed in 2016. The plan directs the department's efforts to remove accessibility barriers on MDT maintained routes, at MDT building facilities, and in MDT's public programs and services. MDT periodically updates the plan to incorporate new technologies, streamlined processes, and modernized approaches that best meet MDT's needs and operating conditions.

We want your input to help guide the plan update!

- Your responses to this survey will help the planning team better understand accessibility needs and barriers.
- The survey should take 5 to 10 minutes to complete.
- **Your answers will remain anonymous.** We do not require any identifying information and will not report individual responses.

For more information on the plan, please visit the website (<https://www.mdt.mt.gov/pubinvolve/ada/>) where you can learn about other opportunities to provide input. Thank you for your participation. The deadline to complete the survey is **APRIL 16, 2021**.

2021 ADA Transition Plan Update

DEFINITIONS

Accessibility: Access to MDT right-of-way, building facilities, services, programs, and activities.

Facilities: MDT district and headquarters office buildings, rest areas, airports, maintenance buildings, and Motor Carrier Services (MCS) scale sites.

Public Right-of-Way: Elements such as curb ramps, sidewalks, crosswalks, median crossings, and pedestrian-activated signal systems on MDT owned and maintained routes.

****Note: This plan only addresses facilities and right-of-way features owned and maintained by MDT. Facilities and features owned by local governments and private entities are not addressed in this plan. Additionally, the plan is not intended to identify specific projects or barrier locations.***

2021 ADA Transition Plan Update

PEDESTRIAN ISSUES

1. What issues are most important to you as a pedestrian? *(Please rank 1-7 with 1 as the most important. Choose drop-down numerical choices or click and hold to drag up or down to reflect preferred ranking)*



Safety (protected facilities, minimal conflicts with other users)



ADA accommodations (accessible curb ramps, pedestrian signals)



Equity (facilities that benefit all community members)



Connectivity (continuous, connected facilities)



Maintenance (snow removal, sweeping of facilities)



Condition (no cracks or broken surfaces)



Path of travel (clear, no obstructions)

2021 ADA Transition Plan Update

STREET ACCESSIBILITY

2. In what areas do you think MDT needs accessibility improvements? *(Please rank 1-5 with 1 as the most important.)*

☰
▣
Pedestrian pathways, sidewalks, or curb ramps

☰
▣
Signage and wayfinding assistance

☰
▣
Crosswalks

☰
▣
Pedestrian signals

☰
▣
On-street parking

3. What suggestions do you have for improvement?

▣

2021 ADA Transition Plan Update

FACILITY ACCESSIBILITY

4. In what areas do you think MDT needs accessibility improvements? *(Please rank 1-5 with 1 as the most important.)*

For reference, you may view district office and rest area locations at <https://www.mdt.mt.gov/mdt/organization/districts.shtml> and <https://www.mdt.mt.gov/travinfo/restarea.shtml>



Headquarters building in Helena



District office buildings



Rest areas



Maintenance shops



Parking for MDT facilities

5. What suggestions do you have for improvement?

6. What should be the highest priority to improve physical access to MDT facilities? (Please rank 1-4 with 1 as the most important.)



Sidewalks



Curb ramps



Pedestrian signals



Crosswalks

2021 ADA Transition Plan Update

PROGRAM ACCESSIBILITY

7. In what areas do you think MDT needs accessibility improvements? *(Please select all that apply.)*

- | | |
|--|--|
| <input type="checkbox"/> MDT website | <input type="checkbox"/> Published data (traffic data, crash data, other data) |
| <input type="checkbox"/> Public involvement (in-person/online meetings, announcements, brochures, other materials) | <input type="checkbox"/> ADA notices |
| <input type="checkbox"/> Reports, manuals, and other published documents | <input type="checkbox"/> ADA grievance procedures |
| <input type="checkbox"/> MDT newsletter | <input type="checkbox"/> ADA informal complaint/communication procedures |
| <input type="checkbox"/> Maps (printed and online) | <input type="checkbox"/> ADA contact information |

Other (please specify)

8. What suggestions do you have for improvement?

2021 ADA Transition Plan Update

ADA TRANSITION PLAN

9. Are you familiar with the 2016 MDT ADA Transition Plan? *(Please select the answer that best applies.)*

- Yes, I've reviewed it thoroughly.
- Yes, I've glanced at it briefly.
- No, I haven't read it.

10. Do you feel the MDT ADA Transition Plan addresses all necessary aspects of accessibility for MDT public rights-of-way, facilities, and programs?

- Yes
- No opinion (I'm not familiar with the plan)
- No (please describe areas that you would like MDT to address further)

2021 ADA Transition Plan Update

DEMOGRAPHICS

Your answers will remain anonymous. Responses are optional, and we will not report individual responses.

11. Which of the following best describes you? *(Please select all that apply.)*

- Individual with a disability
- Family member, friend, or caregiver to a person with a disability
- Advocate for people with disabilities
- Other (please specify)

12. What is your disability status? *(Please select all that apply.)*

- Ambulatory difficulty (having serious difficulty walking or climbing stairs)
- Hearing difficulty (deaf or having serious difficulty hearing)
- Cognitive difficulty (because of a physical, mental, or emotional problem, having difficulty remembering, concentrating, or making decisions)
- Vision difficulty (blind or having serious difficulty seeing, even when wearing glasses)
- Independent living difficulty (because of a physical, mental, or emotional problem, having difficulty doing errands alone such as visiting a doctor's office or shopping)
- Self-care difficulty (having difficulty bathing or dressing)
- I do not have a disability.
- I prefer not to specify my disability.

13. What is your zip code?

14. Please select your age group.

- Under 18
- 19-34
- 35-50
- 51-65
- 65+

15. What type of community setting do you live in?

- City (urban - populations 5,000+)
- Small town (populations less than 5,000)
- Urban fringe (transition zone between urban and country)
- County (rural / country)

2021 ADA Transition Plan Update
ADDITIONAL FEEDBACK

16. Please provide any other comments relating to the ADA Transition Plan you would like MDT to consider.

17. If you would like to join the ADA Transition Plan email list, please provide your name and email address.

Name

Email Address

ADA TRANSITION PLAN UPDATE

Montana Department of Transportation

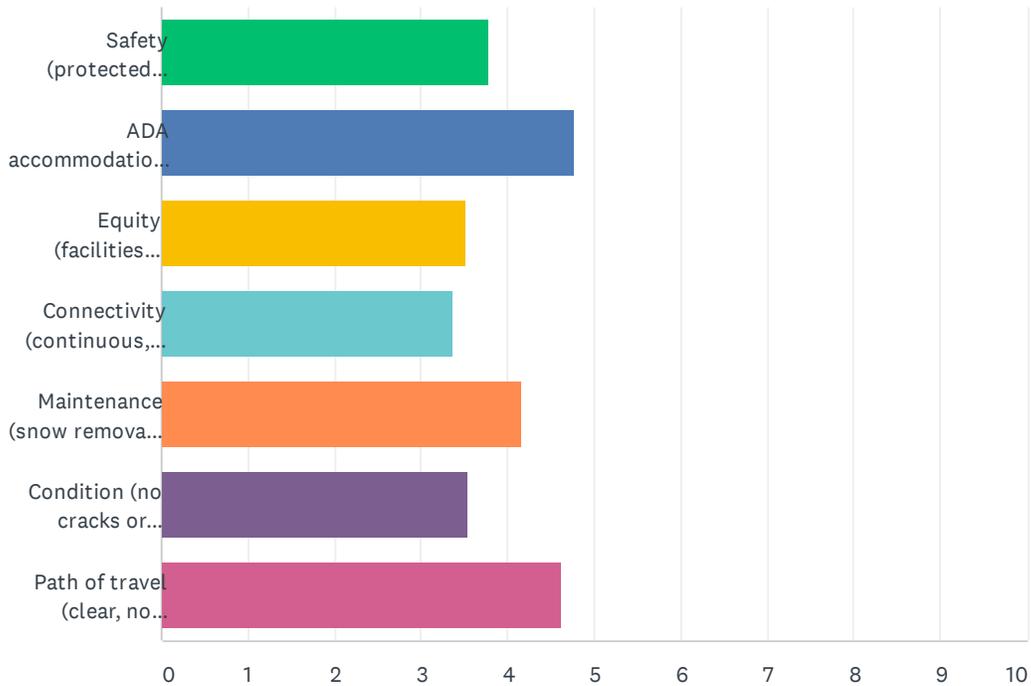


APPENDIX B1-c:

Survey Results

Q1 What issues are most important to you as a pedestrian? (Please rank 1-7 with 1 as the most important. Choose drop-down numerical choices or click and hold to drag up or down to reflect preferred ranking)

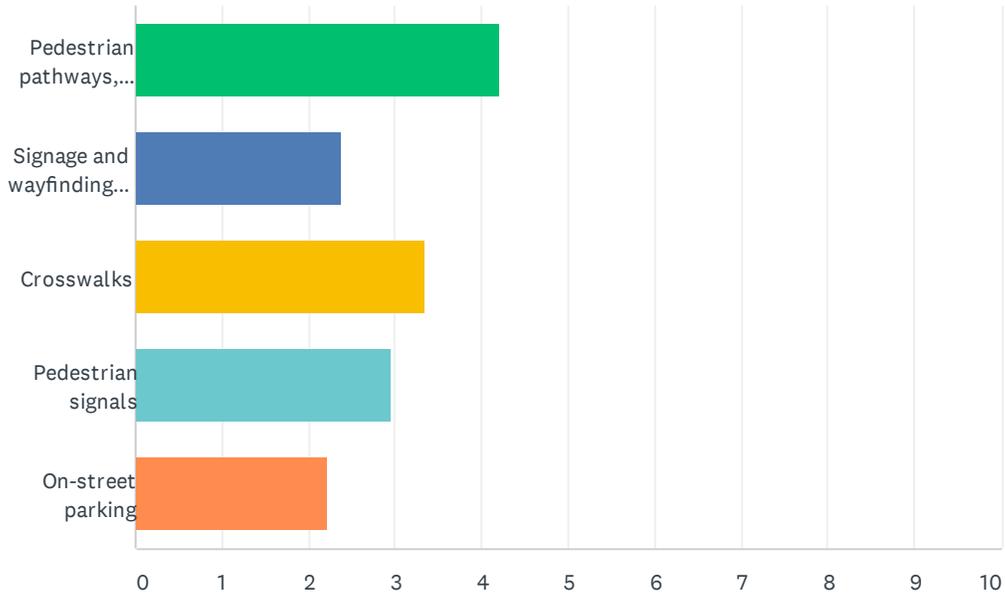
Answered: 69 Skipped: 0



	1	2	3	4	5	6	7	TOTAL	SCORE
Safety (protected facilities, minimal conflicts with other users)	17.46% 11	7.94% 5	9.52% 6	12.70% 8	19.05% 12	19.05% 12	14.29% 9	63	3.78
ADA accommodations (accessible curb ramps, pedestrian signals)	26.98% 17	14.29% 9	22.22% 14	6.35% 4	11.11% 7	14.29% 9	4.76% 3	63	4.78
Equity (facilities that benefit all community members)	19.35% 12	9.68% 6	6.45% 4	9.68% 6	9.68% 6	12.90% 8	32.26% 20	62	3.52
Connectivity (continuous, connected facilities)	12.90% 8	14.52% 9	3.23% 2	9.68% 6	11.29% 7	22.58% 14	25.81% 16	62	3.37
Maintenance (snow removal, sweeping of facilities)	6.35% 4	9.52% 6	30.16% 19	23.81% 15	17.46% 11	3.17% 2	9.52% 6	63	4.16
Condition (no cracks or broken surfaces)	6.45% 4	12.90% 8	9.68% 6	17.74% 11	20.97% 13	16.13% 10	16.13% 10	62	3.53
Path of travel (clear, no obstructions)	10.77% 7	27.69% 18	16.92% 11	20.00% 13	10.77% 7	10.77% 7	3.08% 2	65	4.63

Q2 In what areas do you think MDT needs accessibility improvements? (Please rank 1-5 with 1 as the most important.)

Answered: 67 Skipped: 2



	1	2	3	4	5	TOTAL	SCORE
Pedestrian pathways, sidewalks, or curb ramps	58.33% 35	18.33% 11	11.67% 7	8.33% 5	3.33% 2	60	4.20
Signage and wayfinding assistance	4.76% 3	12.70% 8	25.40% 16	30.16% 19	26.98% 17	63	2.38
Crosswalks	11.48% 7	40.98% 25	26.23% 16	13.11% 8	8.20% 5	61	3.34
Pedestrian signals	10.94% 7	25.00% 16	26.56% 17	23.44% 15	14.06% 9	64	2.95
On-street parking	14.52% 9	4.84% 3	11.29% 7	25.81% 16	43.55% 27	62	2.21

Q3 What suggestions do you have for improvement?

Answered: 25 Skipped: 44

#	RESPONSES	DATE
1	Install signals that speak the name of the street and say when it is safe to cross.	4/17/2021 7:00 AM
2	Crosswalks in Eureka, Montana	4/12/2021 12:43 PM
3	Sidewalks, curbs, and crossings should all be in good condition with no breaks, cracks, or other hazards. Crosswalks need to be well-marked, not just for the pedestrians, but so that traffic can see upcoming, established crossings. Additional signage or lights are good ideas. On-street parking needs van or passenger vehicles' spaces to allow people to leave and return to the vehicle. Regular-sized parking spaces are not wide enough for a walker or wheelchair use.	4/9/2021 12:42 PM
4	MDT streets within urban communities allowing on-street parking of RVs, Trailers, etc., too close to traffic lanes.	4/9/2021 9:54 AM
5	More focus on complete streets and function for all different types of users.	4/8/2021 9:17 AM
6	Make sure that the pedestrian traffic is accessible to everyone.	4/8/2021 7:24 AM
7	None	4/7/2021 9:44 AM
8	Curb cuts/ramps are a great improvement. However what if when doing them to ask for someone with a disability or a person using a wheelchair to give advice on what would work for them rather than saying this meets ADA and lets go beyond ADA.	4/7/2021 8:42 AM
9	Improve crosswalks on state highways near schools.	4/6/2021 11:56 AM
10	light up cross walks are nice	4/6/2021 11:16 AM
11	None.	4/5/2021 2:44 PM
12	Our area in Livingston needs pedestrian activated crosswalk lights on Park Street/US Hwy 89 between 3rd and B Streets - these areas are a death awaiting to happen and can be fixed very easily with some flashing signals to alert vehicles (especially when we have all traffic detoured through the town when I90 shuts down).	4/5/2021 9:09 AM
13	Improve the hashed areas for side ramps	4/3/2021 10:33 AM
14	Do the best you can with what you have	4/2/2021 1:35 PM
15	MDT needs to install more pedestrian activated, lighted signs at cross walks with high volumes of traffic	4/2/2021 10:25 AM
16	Always keep the pedestrian in first place. Unfortunately our entire infrastructure is designed and built with vehicular transportation as the number one goal. Non motorized and pedestrian use cannot be an afterthought.	4/2/2021 8:52 AM
17	Urge municipalities, especially larger municipalities, to adopt PROWAG. Many localities lack on-street accessible parking and many off-street parking lots are privately owned/lease lots leaving many people with disabilities nowhere to park. Encourage RFB's or other pedestrian crossing safety measures at all roundabouts	4/1/2021 9:08 PM
18	Accessible parking and access isles with zero curb. Parking enforcement by smartphone application deemed by state legislation. Local communities to follow. Meet minimum federal ADA guidelines.	4/1/2021 3:49 PM
19	Better signage and signals for pedestrians.	4/1/2021 1:55 PM
20	Make it affordable for the elderly and disabled property owner to assist with sidewalk replacements. Create a grant program for businesses to incentivize their participation, say	4/1/2021 10:17 AM

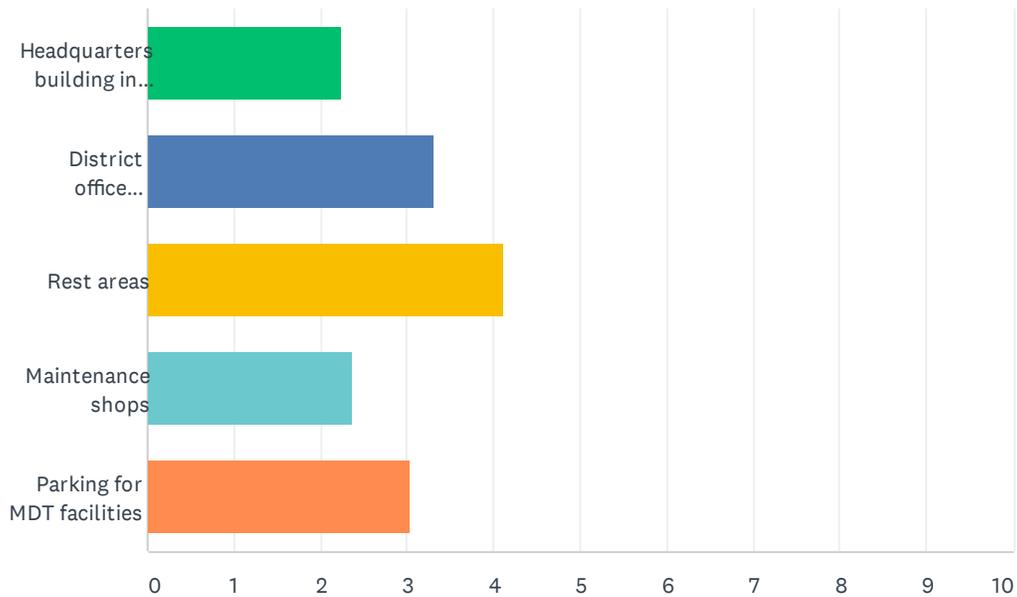
2021 ADA Transition Plan Update

50/50 match. Partner with local governments to better ensure crosswalks are painted and signals maintained.

21	I would like to see the whole state route maintained. We are grateful for the new sidewalks we received but feel both sides of the road need to be maintained rather than one side or the other. Also, we still have an issue with no sidewalk or trail to our store north of the tracks so people walk down the street.	4/1/2021 9:42 AM
22	Encourage sidewalk installation	3/31/2021 3:07 PM
23	MDT this is tough to rank and to me they are all interconnected.	3/31/2021 2:44 PM
24	Make sure that wheelchair bound persons and pedestrians have clear access on main thoroughfares during inclement weather. The fact that the pedestrian and wheelchair folks have to walk/wheel in the street to get to the grocery store because the sidewalks and driveways adjacent to MDT routes are covered in 2 feet of snow even 3 days to 2 weeks later (or till it melts) is reprehensible and very dangerous.	3/31/2021 2:24 PM
25	To follow and enforce the ADAAGs regarding all of the listed items.	3/31/2021 1:45 PM

Q4 In what areas do you think MDT needs accessibility improvements? (Please rank 1-5 with 1 as the most important.) For reference, you may view district office and rest area locations at <https://www.mdt.mt.gov/mdt/organization/districts.shtml> and <https://www.mdt.mt.gov/travinfo/restarea.shtml>

Answered: 55 Skipped: 14



	1	2	3	4	5	TOTAL	SCORE
Headquarters building in Helena	6.12% 3	6.12% 3	30.61% 15	20.41% 10	36.73% 18	49	2.24
District office buildings	15.22% 7	34.78% 16	21.74% 10	21.74% 10	6.52% 3	46	3.30
Rest areas	67.92% 36	7.55% 4	3.77% 2	11.32% 6	9.43% 5	53	4.13
Maintenance shops	4.26% 2	23.40% 11	12.77% 6	23.40% 11	36.17% 17	47	2.36
Parking for MDT facilities	8.51% 4	27.66% 13	34.04% 16	19.15% 9	10.64% 5	47	3.04

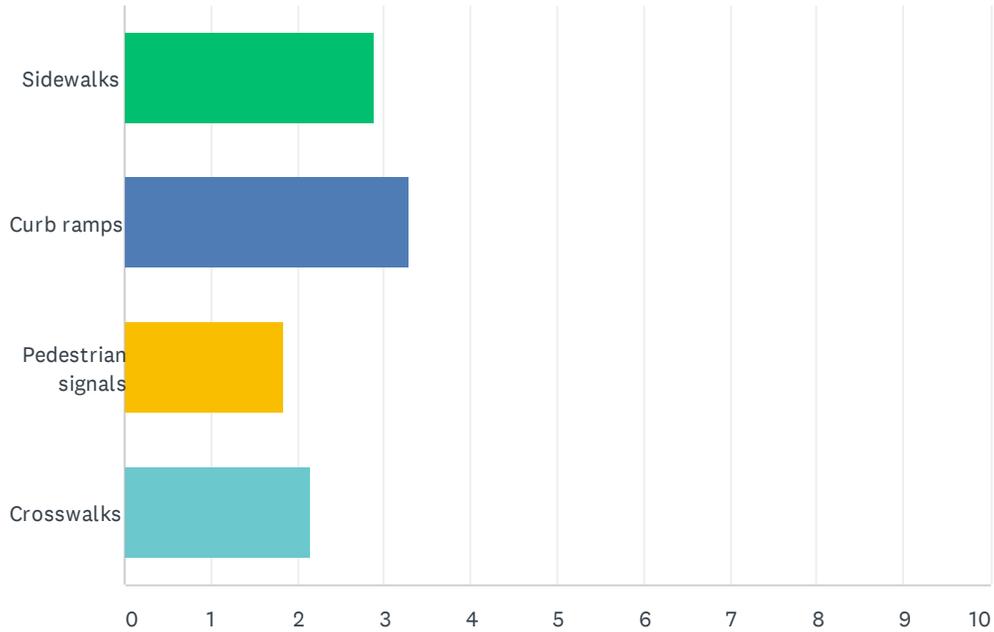
Q5 What suggestions do you have for improvement?

Answered: 15 Skipped: 54

#	RESPONSES	DATE
1	Crosswalks in Eureka, Montana	4/12/2021 12:44 PM
2	Clear unobstructed, well-marked paths/sidewalks/hallways. Signage indicating ramps or entries for persons with disabilities. Restrooms designed for real-life - the typical "handicapped bathroom" is not set up in a way that is easy to use for people with disabilities, especially if they use a wheelchair. A booth may fit the ADA criteria, but the way the bathroom is organized, there may not be enough room to maneuver.	4/9/2021 12:48 PM
3	Have not had any problems with any accessibility to these areas.	4/9/2021 9:58 AM
4	To have more rest areas open all year long.	4/8/2021 8:41 AM
5	Most maintenance shops are not handicap accessible.	4/7/2021 9:46 AM
6	Parking spaces for ADA says this spot needs to be this size. However some of the issues that people using the Accessible parking spots is that the space is still limited and when a wheelchair user is trying to get into a spot to load/unload the spaces are limited and again if we could go beyond ADA to make spaces more accessible would be great.	4/7/2021 8:45 AM
7	none	4/6/2021 11:17 AM
8	None.	4/5/2021 2:45 PM
9	Increase maintenance for ada areas	4/3/2021 10:35 AM
10	MDT needs to focus on improving areas with high pedestrian traffic not MDT headquarters, Maintenance shops, and District Offices.	4/2/2021 10:28 AM
11	State Drivers License in Helena is in violation of the federal ADA law for accessible parking. Have reported the past 2 years. Complete assessment for all state locations serving public to receive necessary licenses, services and information.	4/1/2021 3:53 PM
12	Don't consolidate everything in Helena, give other cities a bite at the apple.	4/1/2021 1:59 PM
13	More dog areas that are actually better drained with double gating to ensure safety while donning and doffing leashes. Huge improvements have been made in this arena, but some of them are on a slope, little grass and really muddy if it's wet. And obviously, some of it is getting people to be responsible about their dog's waste. Maybe educational signs on the diseases that are caused by having all that waste. The parking lots at some of the district facilities should be paved at least partially so that they aren't so hard to navigate for folks in a wheelchair or using a walker	4/1/2021 10:20 AM
14	You assume that mdt is focused just on driving	3/31/2021 2:47 PM
15	Again, to make sure the ADAAGs are being followed and enforced. Since the ADA is 30 years old now, there are no excuses.	3/31/2021 1:47 PM

Q6 What should be the highest priority to improve physical access to MDT facilities? (Please rank 1-4 with 1 as the most important.)

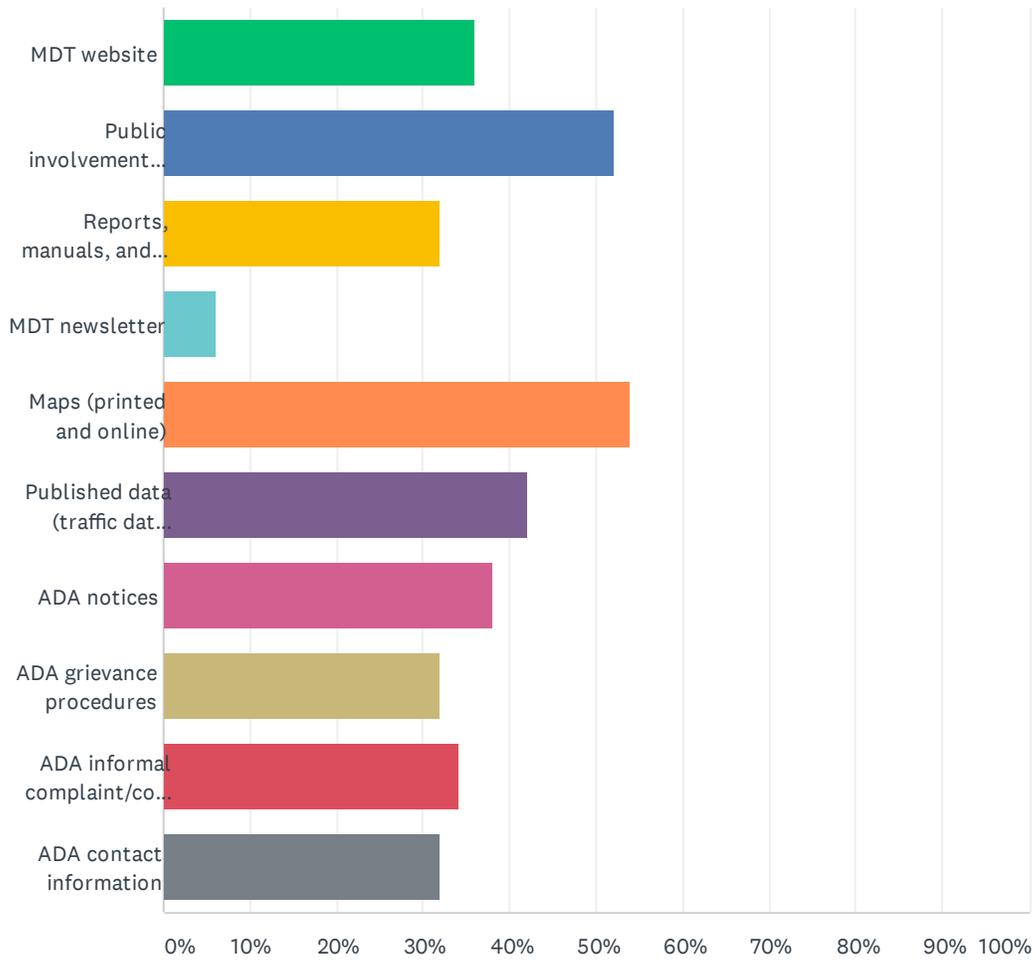
Answered: 57 Skipped: 12



	1	2	3	4	TOTAL	SCORE
Sidewalks	26.00% 13	48.00% 24	14.00% 7	12.00% 6	50	2.88
Curb ramps	65.38% 34	9.62% 5	13.46% 7	11.54% 6	52	3.29
Pedestrian signals	1.96% 1	25.49% 13	27.45% 14	45.10% 23	51	1.84
Crosswalks	12.73% 7	18.18% 10	40.00% 22	29.09% 16	55	2.15

Q7 In what areas do you think MDT needs accessibility improvements? (Please select all that apply.)

Answered: 50 Skipped: 19



2021 ADA Transition Plan Update

ANSWER CHOICES	RESPONSES	
MDT website	36.00%	18
Public involvement (in-person/online meetings, announcements, brochures, other materials)	52.00%	26
Reports, manuals, and other published documents	32.00%	16
MDT newsletter	6.00%	3
Maps (printed and online)	54.00%	27
Published data (traffic data, crash data, other data)	42.00%	21
ADA notices	38.00%	19
ADA grievance procedures	32.00%	16
ADA informal complaint/communication procedures	34.00%	17
ADA contact information	32.00%	16
Total Respondents: 50		

#	OTHER (PLEASE SPECIFY)	DATE
1	Crosswalks in Eureka, Montana	4/12/2021 12:45 PM
2	Montana does not meet minimum federal ADA guidelines in Transportation and Education.	4/1/2021 3:56 PM
3	Communication with Town officials	4/1/2021 9:46 AM
4	I honestly don't know	4/1/2021 7:23 AM
5	stop talking about it, outside of necessary and required public participation, and just fix [REDACTED] that needs to be fixed and improved	3/31/2021 2:30 PM
6	I have no idea	3/31/2021 2:21 PM

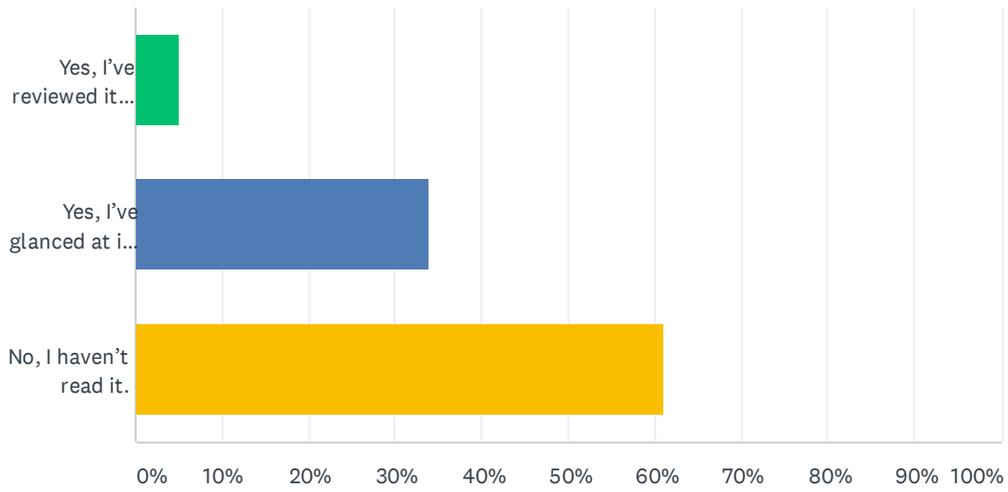
Q8 What suggestions do you have for improvement?

Answered: 12 Skipped: 57

#	RESPONSES	DATE
1	Crosswalks in Eureka, Montana	4/12/2021 12:45 PM
2	Overall accessibility to all buildings that MDT owns and does maintenance on.	4/8/2021 7:28 AM
3	When building something that says it meets ADA is great however if you could get someone that needs that accessibility to give you some points on what would work better for the people with a disability would be a great step forward.	4/7/2021 8:47 AM
4	None.	4/5/2021 2:46 PM
5	spend money wisely	4/2/2021 1:40 PM
6	Every journey starts with the first step.	4/2/2021 10:29 AM
7	make sure that all docmation and web sites are assisable to everyone with disabilitys and remember the visually impared when you make modifactions	4/1/2021 9:18 PM
8	Accessible Parking Enforcement Smartphone application. Ask Disabled people who are not Legally Blind and who actually Drives.	4/1/2021 3:56 PM
9	None.	4/1/2021 1:59 PM
10	The crash data and other public information needs to be written more for the lay person.	4/1/2021 12:33 PM
11	Communication with Town officials before starting a project through town. Our Town Officials (Mayor and council) did not know when the project started until the crew showed up one day. They also did not know the scope of the project without asking someone. Simple communication helps ask we are all on the same team.	4/1/2021 9:46 AM
12	Fund and complete the ADA transition plan that I am assuming, yes I know what that may get me, exists so that the work gets done and the accessibility improvements exist. Theoretical action and feel good meetings don't get the work done.	3/31/2021 2:30 PM

Q9 Are you familiar with the 2016 MDT ADA Transition Plan? (Please select the answer that best applies.)

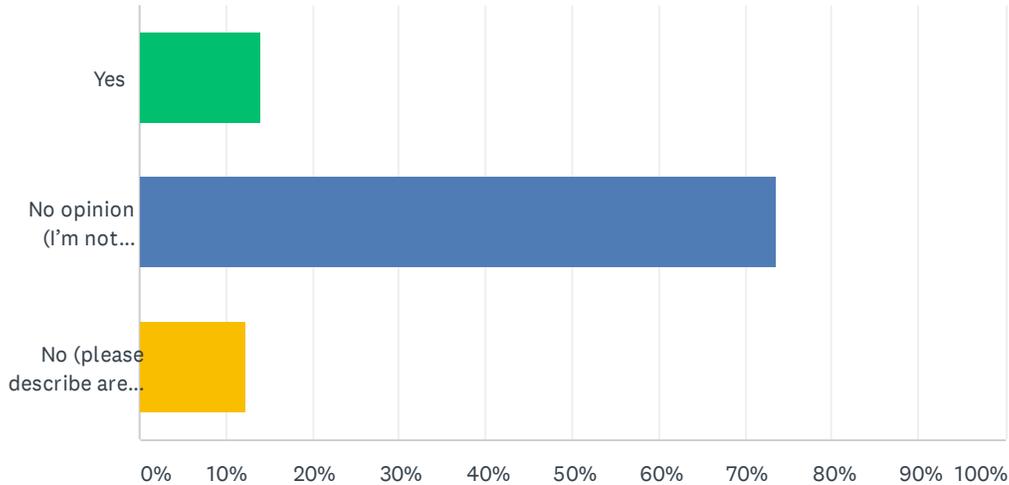
Answered: 59 Skipped: 10



ANSWER CHOICES	RESPONSES	
Yes, I've reviewed it thoroughly.	5.08%	3
Yes, I've glanced at it briefly.	33.90%	20
No, I haven't read it.	61.02%	36
TOTAL		59

Q10 Do you feel the MDT ADA Transition Plan addresses all necessary aspects of accessibility for MDT public rights-of-way, facilities, and programs?

Answered: 57 Skipped: 12

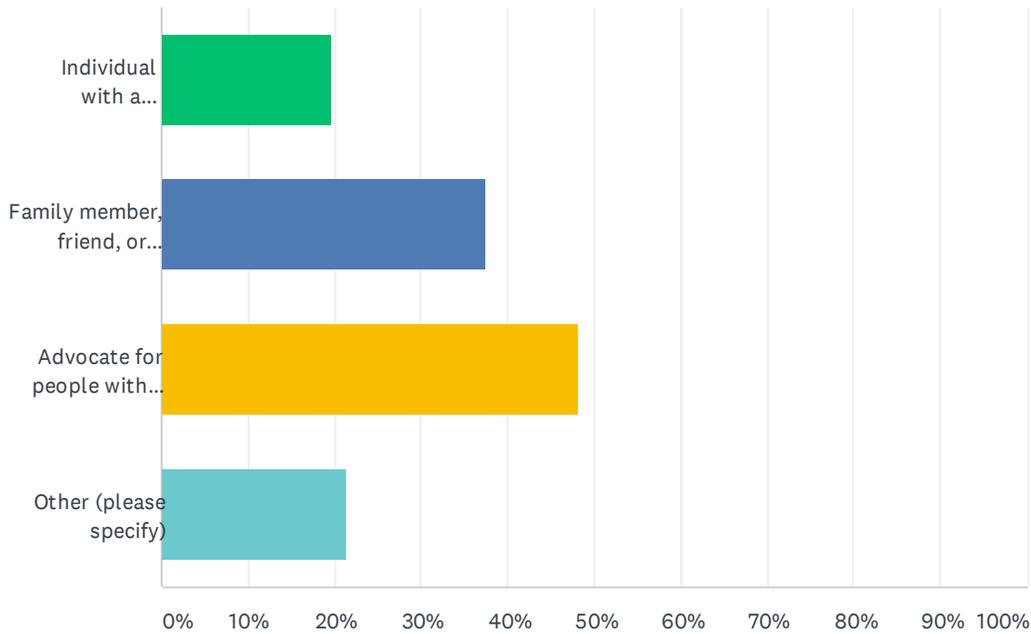


ANSWER CHOICES	RESPONSES	
Yes	14.04%	8
No opinion (I'm not familiar with the plan)	73.68%	42
No (please describe areas that you would like MDT to address further)	12.28%	7
TOTAL		57

#	NO (PLEASE DESCRIBE AREAS THAT YOU WOULD LIKE MDT TO ADDRESS FURTHER)	DATE
1	pedestrian traffic signals	4/17/2021 7:11 AM
2	Needs to met future needs and not go back and other areas already imporved until needed. Just updating to standards is sometiome a waste of money. Connectivity should be more important area a city.	4/7/2021 6:42 AM
3	Wheelchair loading zones need to be bigger	4/3/2021 10:37 AM
4	Coordination with representatives of the disability community and external ADA expert input could be refined/improved. Make municipalities and other local government entities more aware that MDT has adopted PROWAG and encourage them to do the same.	4/1/2021 9:18 PM
5	Accessible parking enforcement. Curbcut consistently and Accessible. Compiling with federal ADA guidelines and consult with disabled community, not organizations. Enforcement of violation. EDUCATION of ADA and Accessible options. Access to crossing lights. Roundabout accessibility. Rail and bus transportation throughout the state. Amtrack, passenger rail. City and county busses supported by local and state funding.	4/1/2021 4:03 PM
6	pedestrian interconnectivity	3/31/2021 2:52 PM
7	It probably doesn't address all necessary aspects, but if the NHTSA and UTCD standards for the improvements are still up to date, do the work.	3/31/2021 2:31 PM

Q11 Which of the following best describes you? (Please select all that apply.)

Answered: 56 Skipped: 13

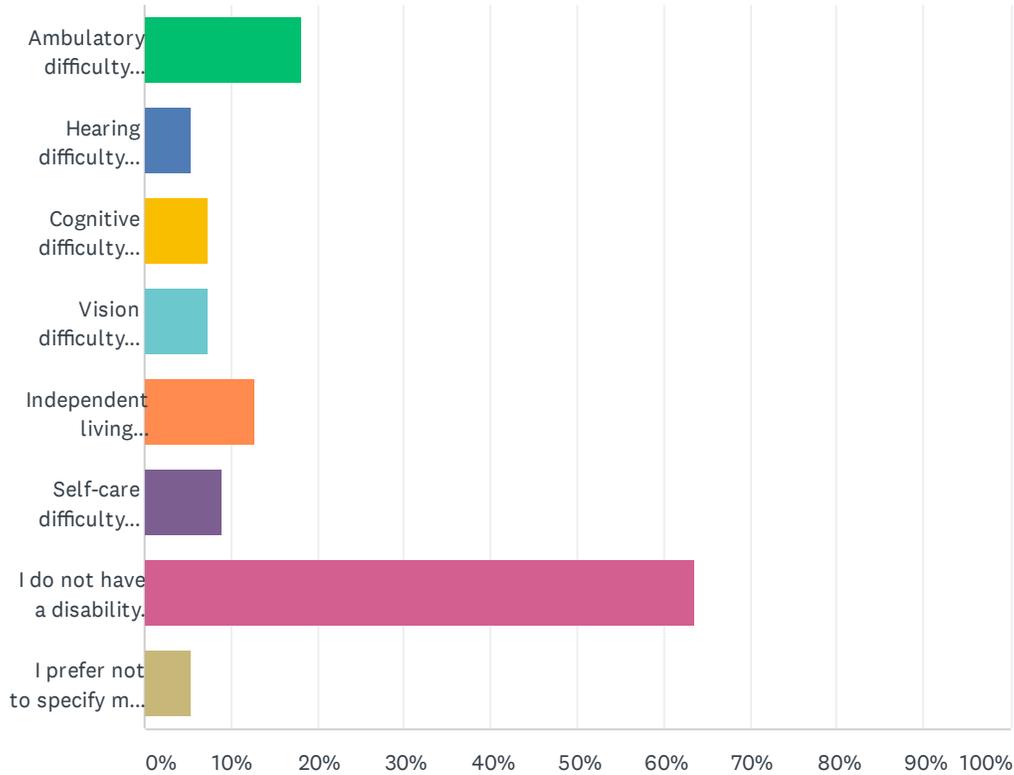


ANSWER CHOICES	RESPONSES
Individual with a disability	19.64% 11
Family member, friend, or caregiver to a person with a disability	37.50% 21
Advocate for people with disabilities	48.21% 27
Other (please specify)	21.43% 12
Total Respondents: 56	

#	OTHER (PLEASE SPECIFY)	DATE
1	Crosswalks in Eureka, Montana	4/12/2021 12:46 PM
2	Concerned citizen	4/5/2021 2:47 PM
3	I work with Senior Citizens	4/5/2021 10:03 AM
4	ADA Coordinator	4/2/2021 10:30 AM
5	GOVERNMENT EMPLOYEE COMPLETING FORM	4/1/2021 11:43 AM
6	none of the above	4/1/2021 10:45 AM
7	Clerk Treasurer	4/1/2021 9:48 AM
8	Private citizen	4/1/2021 9:42 AM
9	Area Agency on Aging director	4/1/2021 8:55 AM
10	Employee	3/31/2021 3:11 PM
11	none	3/31/2021 2:42 PM

Q12 What is your disability status? (Please select all that apply.)

Answered: 55 Skipped: 14



ANSWER CHOICES	RESPONSES	
Ambulatory difficulty (having serious difficulty walking or climbing stairs)	18.18%	10
Hearing difficulty (deaf or having serious difficulty hearing)	5.45%	3
Cognitive difficulty (because of a physical, mental, or emotional problem, having difficulty remembering, concentrating, or making decisions)	7.27%	4
Vision difficulty (blind or having serious difficulty seeing, even when wearing glasses)	7.27%	4
Independent living difficulty (because of a physical, mental, or emotional problem, having difficulty doing errands alone such as visiting a doctor's office or shopping)	12.73%	7
Self-care difficulty (having difficulty bathing or dressing)	9.09%	5
I do not have a disability.	63.64%	35
I prefer not to specify my disability.	5.45%	3
Total Respondents: 55		

Q13 What is your zip code?

Answered: 53 Skipped: 16

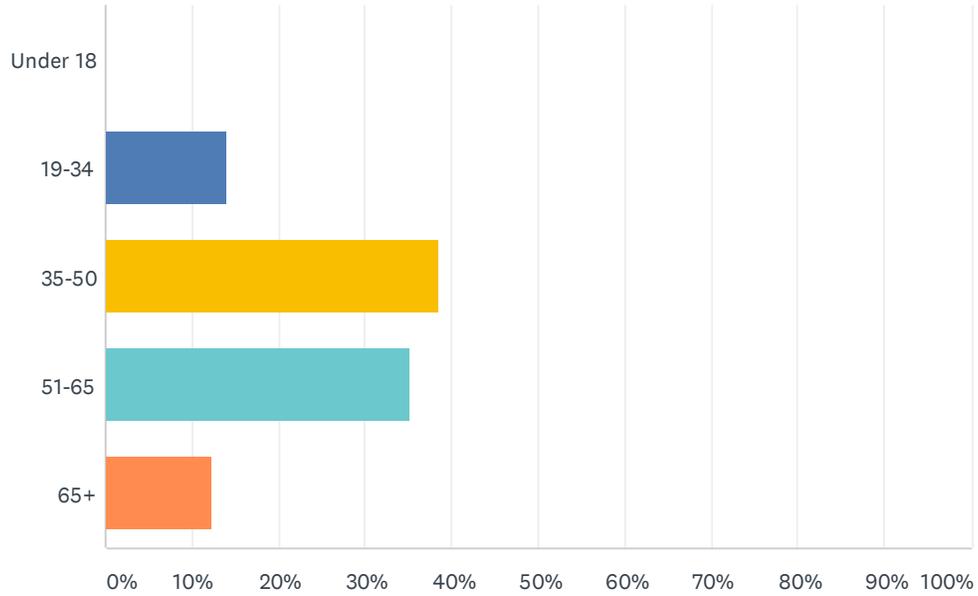
#	RESPONSES	DATE
1	59405	4/17/2021 7:23 AM
2	59930	4/12/2021 12:46 PM
3	59840	4/9/2021 12:53 PM
4	59401	4/9/2021 10:02 AM
5	59230	4/8/2021 8:43 AM
6	59301	4/8/2021 7:29 AM
7	59632	4/7/2021 9:47 AM
8	59601	4/7/2021 8:48 AM
9	59072	4/7/2021 8:23 AM
10	59602	4/7/2021 6:42 AM
11	59721	4/6/2021 11:58 AM
12	59635	4/6/2021 11:50 AM
13	59036	4/6/2021 11:19 AM
14	59405	4/5/2021 2:47 PM
15	59803	4/5/2021 10:16 AM
16	59050	4/5/2021 10:03 AM
17	59801	4/5/2021 9:58 AM
18	59047	4/5/2021 9:11 AM
19	59801	4/3/2021 10:39 AM
20	59072	4/2/2021 1:43 PM
21	59047	4/2/2021 12:22 PM
22	59523	4/2/2021 10:54 AM
23	59404	4/2/2021 10:30 AM
24	59601	4/2/2021 8:56 AM
25	59044	4/1/2021 9:20 PM
26	59801	4/1/2021 9:19 PM
27	59601	4/1/2021 4:03 PM
28	59602	4/1/2021 2:34 PM
29	59711	4/1/2021 2:01 PM
30	59102	4/1/2021 1:08 PM
31	59864	4/1/2021 1:03 PM
32	59405	4/1/2021 12:39 PM
33	59937	4/1/2021 11:59 AM

2021 ADA Transition Plan Update

34	59215	4/1/2021 11:43 AM
35	59454	4/1/2021 10:45 AM
36	59847	4/1/2021 10:39 AM
37	59007	4/1/2021 10:22 AM
38	59212	4/1/2021 9:48 AM
39	59089	4/1/2021 9:46 AM
40	59474	4/1/2021 9:42 AM
41	59901	4/1/2021 8:55 AM
42	59101	4/1/2021 8:27 AM
43	59901	4/1/2021 7:23 AM
44	59201	3/31/2021 3:32 PM
45	59248	3/31/2021 3:31 PM
46	59087	3/31/2021 3:11 PM
47	59601	3/31/2021 3:10 PM
48	59404	3/31/2021 2:53 PM
49	59404	3/31/2021 2:42 PM
50	59047	3/31/2021 2:32 PM
51	59421	3/31/2021 2:26 PM
52	59718	3/31/2021 2:22 PM
53	59601	3/31/2021 1:48 PM

Q14 Please select your age group.

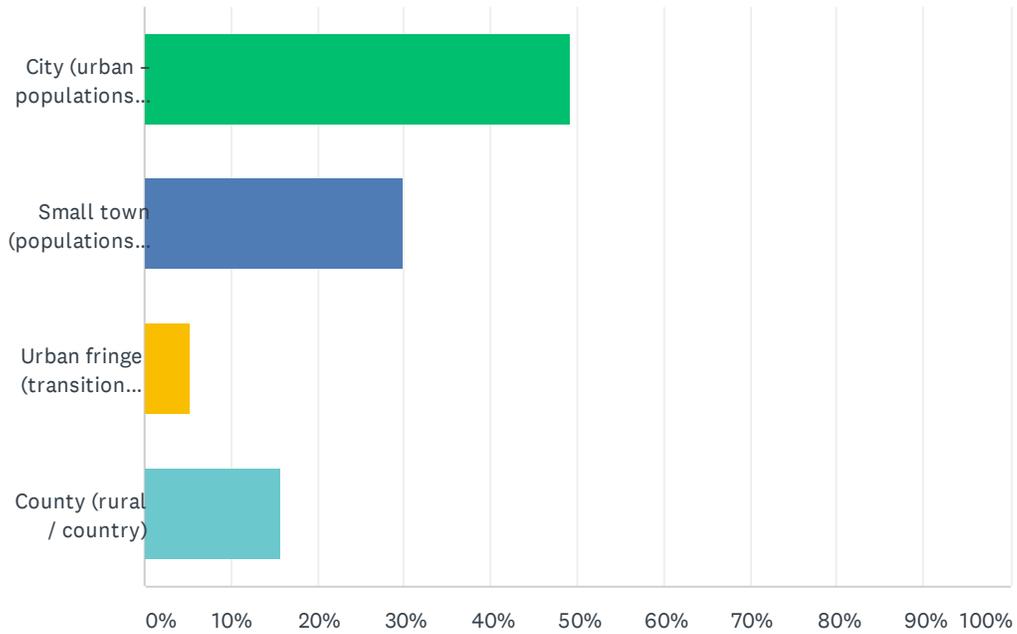
Answered: 57 Skipped: 12



ANSWER CHOICES	RESPONSES	
Under 18	0.00%	0
19-34	14.04%	8
35-50	38.60%	22
51-65	35.09%	20
65+	12.28%	7
TOTAL		57

Q15 What type of community setting do you live in?

Answered: 57 Skipped: 12



ANSWER CHOICES	RESPONSES	
City (urban – populations 5,000+)	49.12%	28
Small town (populations less than 5,000)	29.82%	17
Urban fringe (transition zone between urban and country)	5.26%	3
County (rural / country)	15.79%	9
TOTAL		57

Q16 Please provide any other comments relating to the ADA Transition Plan you would like MDT to consider.

Answered: 7 Skipped: 62

#	RESPONSES	DATE
1	We need Crosswalks in Eureka, Montana	4/12/2021 12:46 PM
2	I need to study the plan further before making further recommendations.	4/9/2021 1:24 PM
3	Not familiar with ADA Plan	4/9/2021 10:03 AM
4	Need to address ADA compliance with pathways along state right of way in small towns and rural communities.	4/7/2021 9:47 AM
5	None.	4/5/2021 2:47 PM
6	Hash strips was n parking spots need to be wider	4/3/2021 10:40 AM
7	I don't know enough about specific MDT facilities or right-of-way areas to speak to needed improvements , so the few answers I gave reflect what I think are general priorities relative to accessibility	4/1/2021 8:57 AM

Q17 If you would like to join the ADA Transition Plan email list, please provide your name and email address.

Answered: 11 Skipped: 58

ANSWER CHOICES	RESPONSES	
Name	100.00%	11
Email Address	100.00%	11

#	NAME	DATE
1	██████████	4/17/2021 7:24 AM
2	██████████	4/9/2021 1:24 PM
3	██████████	4/8/2021 8:44 AM
4	██████████	4/8/2021 7:29 AM
5	██████████	4/5/2021 9:11 AM
6	██████████	4/3/2021 10:40 AM
7	██████████	4/1/2021 9:21 PM
8	██████████	4/1/2021 9:19 PM
9	██████████	4/1/2021 4:04 PM
10	██████████	4/1/2021 10:45 AM
11	██████████	3/31/2021 2:54 PM

#	EMAIL ADDRESS	DATE
1	██████████	4/17/2021 7:24 AM
2	██████████	4/9/2021 1:24 PM
3	██████████	4/8/2021 8:44 AM
4	██████████	4/8/2021 7:29 AM
5	██████████	4/5/2021 9:11 AM
6	██████████	4/3/2021 10:40 AM
7	██████████	4/1/2021 9:21 PM
8	██████████	4/1/2021 9:19 PM
9	██████████	4/1/2021 4:04 PM
10	██████████	4/1/2021 10:45 AM
11	██████████	3/31/2021 2:54 PM

ADA TRANSITION PLAN UPDATE

Montana Department of Transportation



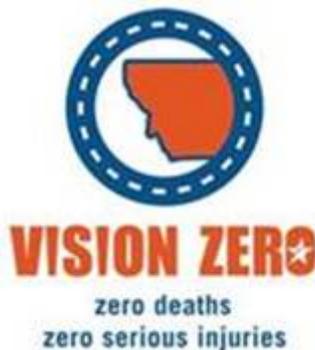
APPENDIX B1-d:

Survey Email Announcement

Greetings!

The Montana Department of Transportation (MDT) is updating its Americans with Disabilities Act (ADA) Transition Plan, which outlines the Department's efforts to remove accessibility barriers on MDT maintained routes, at MDT building facilities, and in MDT's public programs and services. MDT is conducting a [survey \[surveymonkey.com\]](#) to help the planning team better understand accessibility needs and barriers. This survey should take 5 to 10 minutes to complete, and your answers will remain anonymous. **The survey deadline is April 16, 2021.** We look forward to your input!

For more information on the plan update, please visit the website at <https://www.mdt.mt.gov/pubinvolve/ada/>. For alternative accommodations, please contact Matt Maze, Office of Civil Rights, P.O. Box 201001, Helena, Montana 59620; telephone (406) 444-5416; Montana Relay 711; facsimile (406) 444-7243; or e-mail to mmaze@mt.gov.



Matt Maze

External ADA Specialist | Office of Civil Rights
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Helena, MT 59620

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mmaze@mt.gov



ADA TRANSITION PLAN UPDATE

Montana Department of Transportation



APPENDIX B2:

Stakeholder Outreach - May 2021

Appendix B2-a: Stakeholder Outreach Summary

Appendix B2-b: Stakeholder Meeting Presentation

Appendix B2-c: Stakeholder Outreach Email Announcement

ADA TRANSITION PLAN UPDATE

Montana Department of Transportation



APPENDIX B-2a:

Stakeholder Outreach Summary

ADA TRANSITION PLAN UPDATE

Montana Department of Transportation



June 2, 2021

B2-a: Stakeholder Outreach Summary

Prepared for:

Montana Department of Transportation



Prepared by:

**Robert Peccia
and Associates**

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STAKEHOLDER OUTREACH SUMMARY

1.0 Introduction

The Montana Department of Transportation (MDT) has engaged Robert Peccia and Associates (RPA) to update the 2016 *Americans with Disabilities Act (ADA) Transition Plan* which directs the department’s efforts to provide an accessible transportation system within the state of Montana. The purpose of the plan is to provide guidance for removal of accessibility barriers in the public right-of-way on State of Montana maintained routes and in MDT’s public programs and services. The plan provides an overview of MDT’s external ADA program, outlines MDT’s mission and ADA policy, and identifies methods to assist MDT in complying with ADA regulations. An update to the plan is needed to ensure it provides communication of MDT practices and Federal Highway Administration (FHWA) guidance and requirements and that it continues to provide a consistent, repeatable, recognized methodology to be used as a tool for MDT efforts to remove accessibility barriers.

Over the past several years since adoption of the 2016 plan, MDT has had an opportunity to implement the transition plan and continue conversations with staff and stakeholders about potential process improvements and refinements. As MDT approaches the five-year mark, these circumstances present an ideal opportunity to update the plan. With this update it is important to understand and consider public input relating to MDT program and facility access, with specific focus on feedback from the disability community. Accordingly, RPA facilitated initial outreach during the Discovery Phase with key stakeholder groups who have knowledge or experience related to the state’s ADA program. Through these discussions, we have gained insightful information about needs, issues, challenges, and areas for improvement. **Table 1.1** provides a summary of the outreach activities conducted by RPA including the date, group, and participants as well as members of the ADA Transition Plan Project Management Team (PMT) who participated in the activities.

Table 1.1: Stakeholder Outreach Details

Date	Group	Participants (Role)	PMT Participants (Role)
04/09/2021	University of Montana Rural Institute	Meg Traci (Project Director, Research Associate Professor - The Montana Disability and Health Program)	Ben Murphy (MDT Project Manager) Matt Maze (External ADA Coordinator) Megan Handl (Office of Civil Rights – Operations Supervisor)
05/10/2021	Stakeholder Input Meeting #1	Shyla Patera (Independent living specialist - North Central Independent Living Services) Colleen Forrester (Independent Living Specialist - North Central Independent Living Services) Gina Lyttle (Public) Vern Anderson (LIFTT – Billings) Darin Heitt-Rennie (Case Manager – AWARE, Bozeman/ Gallatin Valley) Mary Millin (People First Advisor/Independent Living Specialist – Summit Independent Living, Hamilton) Mark O’Brien (Missoula Blind and Low Vision Services) Cici (Unknown)	Ben Murphy (MDT Project Manager) Matt Maze (External ADA Coordinator) Patricia Schwinden (Office of Civil Rights [OCR] Operations Chief) Megan Handl (OCR Operations Supervisor)

Date	Group	Participants (Role)	PMT Participants (Role)
		Anonymous Participant (Unknown)	
05/11/2021	Stakeholder Input Meeting #2	Vern Anderson (LIFTT – Billings)	Ben Murphy (MDT Project Manager) Matt Maze (External ADA Coordinator) Patricia Schwinden (OCR Operations Chief) Megan Handl (OCR Operations Supervisor)

1.1. Format

Due to local health and safety restrictions, meetings were conducted virtually using Microsoft Teams. The original intent was to have informal conversations with stakeholders to understand their needs and any areas of improvement for MDT. However, due to scheduling/coordination issues, it was decided that two presentations would be given for all interested stakeholder to attend at their convenience. Participants were given the option to attend an afternoon meeting on Monday, May 10, 2021, or an evening meeting on Tuesday, May 11, 2021, with the same presentation provided at each meeting. An opportunity for open discussion was offered following each presentation. The agenda for the presentation was as follows and a copy of presentation can be found in **Appendix A**.

- I. Welcome and Introductions
- II. Transition Plan Overview
- III. Public Survey Feedback
- IV. Website Review and Future Feedback

2.0 Outreach Summary

The following sections provide a summary of the meetings RPA conducted including comments from participants.

2.1. University of Montana Rural Institute

On April 9, 2021, RPA met with Meg Traci from the University of Montana Rural Institute, who has extensive experience working with the disability community through various research projects and leadership positions. The conversation with Dr. Traci provided the following insights.

- As internal systems at MDT are developed, it is important to address Equal Employment Opportunity (EEO) needs. Without a culture of EEO within the department, it can be difficult to promote accessibility and inclusion throughout the state. The internal ADA coordinator role has moved to the Human Resources (HR) department within MDT. All internally focused ADA issues are handled through HR while external elements are handled through OCR. However, OCR has some EEO functions as well. Continued and strengthened coordination is recommended.
- The ADA inventory is focused on site design and not necessarily connectivity or equitable access. The assessments could possibly index opportunities to connect people to goods and services such as healthy foods, affordable housing, transit stops, or community centers. Nationally, there is inherent bias that disabled people and seniors do not need to connect to these types of destinations. MDT should explore the potential for a mobility or economic development index to overlay ADA compliance scores with connectivity and access. In addition to constructing infrastructure to meet ADA design standards, civil rights

is about providing equal access and removing processes and other barriers that are discriminatory to those with disabilities.

- MDT has great data and should explore how to make that data useful for other groups. For example, MDT could consider if there is a way to integrate MDT's database with online wayfinding platforms for the blind and low vision community.
- It is important to identify accessible routes around construction zones and find a way to integrate with online wayfinding platforms. For example, a sign indicating that the sidewalk is closed does not help blind or low vision individuals.
- There is value in improved communication with those who have lived experience with disabilities and in thinking about MDT's role in cultivating expertise in communities. For example, MDT could offer training to the disability community, explain relevant terminology, and open lines of communication.
- When assessing accessibility, it is important to think about what individuals look like with their equipment in order to build a space that everyone can all share together (e.g., manual wheelchairs and power chairs have different widths).
- MDT should consider evaluating evacuation routes during natural disasters and prioritizing routes for evacuation with the disability community in mind. MDT could potentially use the [National Risk Index](#) data from FEMA to prioritize curb ramps across the state. MDT does have an internal team that assesses at-risk individuals who would need help during an emergency.

2.2. Stakeholder Input Meeting #1

On May 10, 2021, RPA and the MDT PMT hosted an afternoon meeting at 2:00 PM for interested stakeholders from the disability community. A total of nine participants were present at the meeting representing North Central Independent Living Services, Living Independently For Today & Tomorrow (LIFTT), Summit Independent Living Center, Montana Blind and Low Vision Services, AWARE, and other participants representing themselves. After giving a presentation covering an overview of the plan, public survey results, and other public engagement opportunities, RPA invited participants to share feedback and ask questions. The following summarizes the discussion.

- Coordination between MDT, counties, and cities is desired especially where county or rural roads interface with MDT routes. In many cases the MDT route is improved, but the local route is not accessible. The lack of connectivity is challenging and presents a safety concern.
- Roundabouts can be challenging to navigate, especially on major thoroughfares. Measures should be taken to provide ADA accommodations near and around roundabouts. When designing a roundabout, consider the different contexts of the location (i.e., in town and out of town) and what types of accommodations and connectivity are needed.
- When a blind person crosses a street, they are taught to listen to the traffic flow and begin moving at the beginning of the cycle with parallel traffic. Some signals, however, have a delay where a right-turn only phase is provided, which is confusing to users and can be a major safety concern. Conversely, leading pedestrian intervals are challenging if users cannot use audible traffic noise as a cue.

- Audible traffic signals can be difficult to hear, especially with traffic noise. It also seems that many of the pedestrian signal timings are too short for users to cross. MDT should re-evaluate signal timing to adjust for pedestrian crossing times at spot locations.
- Some pedestrian push buttons are not accessible (e.g., a location in Helena with a private gate around the button). Similarly, sometimes the push buttons are too high and out of reach. If the user has to raise their wheelchair to push the button, sometimes they do not have enough time to lower the chair, turn around, and cross the roadway in the allotted time. It was noted that all new pedestrian signals that MDT installs are accessible, and MDT can look at spot locations for improvements at older signals. The signals mentioned during the discussion are city owned, and MDT does not have jurisdiction to change city signals. However, MDT can pass along push button concerns to the appropriate jurisdiction.
- Sometimes a sidewalk will be clear and accessible but there is no curb ramp provided at the corner. In these instances, individuals (wheelchair users, especially) have to use the nearest driveway, which can be challenging.

2.3. Stakeholder Input Meeting #2

On May 10, 2021, RPA and the PMT hosted an evening meeting at 6:00 PM for interested stakeholders from the disability community. Only one participant joined the meeting. This individual represented LIFTT and himself and had attended the afternoon meeting the previous day. Since the individual had already viewed the prepared presentation, the meeting was opened for an informal discussion of issues, opportunities, and areas of concern. The conversation was focused on ADA accessible parking.

- ADA accessible parking is a topic of particular concern to meet everyday user needs. The discussion was not only directed at MDT's accessible parking, but also at West Yellowstone, Pompey's Pillar, and other locations in general. At Pompey's Pillar, it was noted that some of the access routes are gravel surfaced and heavy wheelchairs can become buried and stuck in the deep gravel. MDT noted that the standard is to provide "firm, stable, and slip resistant" surfaces but there may be different guidelines for areas that are considered federal trails.
- In general, it is not uncommon for wheelchair users to have to make their own ADA accessible parking stall by taking two spots and angling the vehicle into the space. This allows enough room to deploy the ramp to enter and exit the vehicle. This is especially difficult when parking stalls are on a steep grade.
- MDT is committed to providing ADA accessible parking at MDT office, maintenance, and other building facilities, including rest areas. Occasionally, MDT works with maintenance crews to mark ADA parking on-street along a highway if there is a direct public request. In bigger cities, such as Bozeman or Kalispell, parking commissions designate on-street ADA parking.

ADA TRANSITION PLAN UPDATE

Montana Department of Transportation



APPENDIX B2-b:

Stakeholder Meeting Presentation

ADA TRANSITION PLAN UPDATE

Montana Department of Transportation



Stakeholder Meetings

May 10 and May 11, 2021

Meeting Agenda & Format

Presentation

- I Welcome & Introductions
- II Transition Plan Overview
- III Survey Feedback
- IV Website Review and Future Feedback

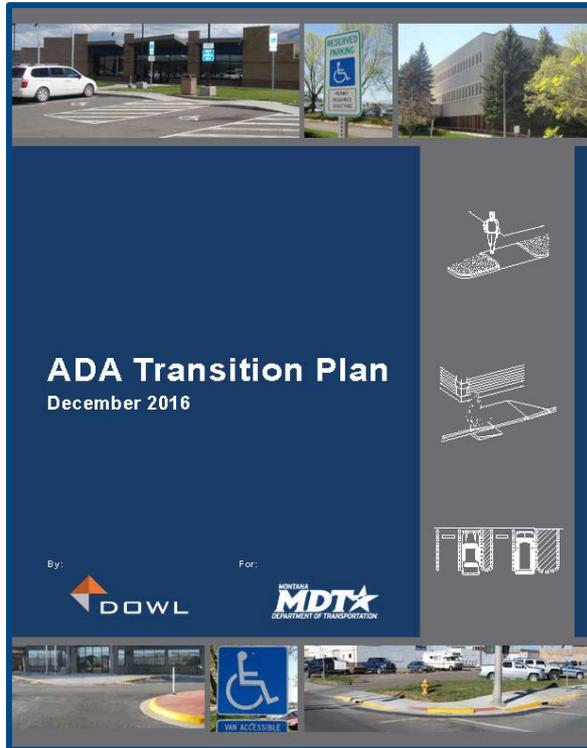
Question & Answer Period

Planning Team Introductions

Slide: 3

Transition Plan Overview

What is the ADA Transition Plan?



Provides guidance for
**removal of
accessibility
barriers**

in the public right-of-way on
State of Montana maintained
routes and in MDT's public
programs and services

Transition Plan Organization

1.0 Introduction

- Regulatory Framework
- MDT Mission and ADA Policy Statement

2.0 ADA Program Methods

- Administration
- Communications
- Rights-of-Way
- Building Facilities

3.0 Implementation Plan & Schedule

4.0 Public and Stakeholder Outreach

Supporting Appendices

December 2016 ADA Transition Plan



1.0 Introduction

The Montana Department of Transportation (MDT) Americans with Disabilities Act (ADA) transition plan is intended to direct the department's efforts to provide an accessible transportation system within the state of Montana. The purpose of the plan is to provide guidance for removal of

December 2016 ADA Transition Plan



2.0 ADA Program Methods

In support of the MDT mission and ADA policy, the following sections outline methods MDT uses to make its programs, rights-of-way, and building facilities accessible to individuals with disabilities in fulfillment of 28 CFR 35.150(d)(3)(ii). These

December 2016 ADA Transition Plan



3.0 Implementation Plan and Schedule

MDT is committed to eliminating accessibility barriers for individuals with disabilities within its programs, rights-of-way, and building facilities.

December 2016 ADA Transition Plan



4.0 Public and Stakeholder Outreach

Public and stakeholder input is an essential element in the transition plan development and self-evaluation processes. ADA implementing regulations require public entities to provide an opportunity to interested persons, including individuals with disabilities, to participate in the self-evaluation process and development of the transition plan by submitting comments (28 CFR 35.105(b) and 28 CFR 35.150(d)(1)).

What elements are addressed?

- **Existing and Newly Constructed Features**

- **Right-of-Way Features**

- Curb Ramps
 - Sidewalks
 - Crosswalks
 - Pedestrian Activated Signals

- **Building Facilities**

- MDT Headquarters (Helena)
 - District Office Buildings
 - Rest Areas
 - Airports
 - Maintenance Buildings
 - Scale Sites

- **MDT Programs, Services, and Activities**

What Methods are addressed?



- **Administration**
 - External ADA program management
- **Communications**
 - Eliminate communication barriers, provide auxiliary aids
- **Right-of-way Features**
 - ADA Inventory
 - Project Identification
 - Design and Construction
 - Operation and Maintenance
- **Building Facilities**
 - ADA Inventory
 - Design, Construction, Maintenance

What is not addressed in the ADA Transition Plan?



- Specific project locations
- Local right-of-way features and facilities
- Internal MDT employment accessibility

Goals and Purpose of Plan Update



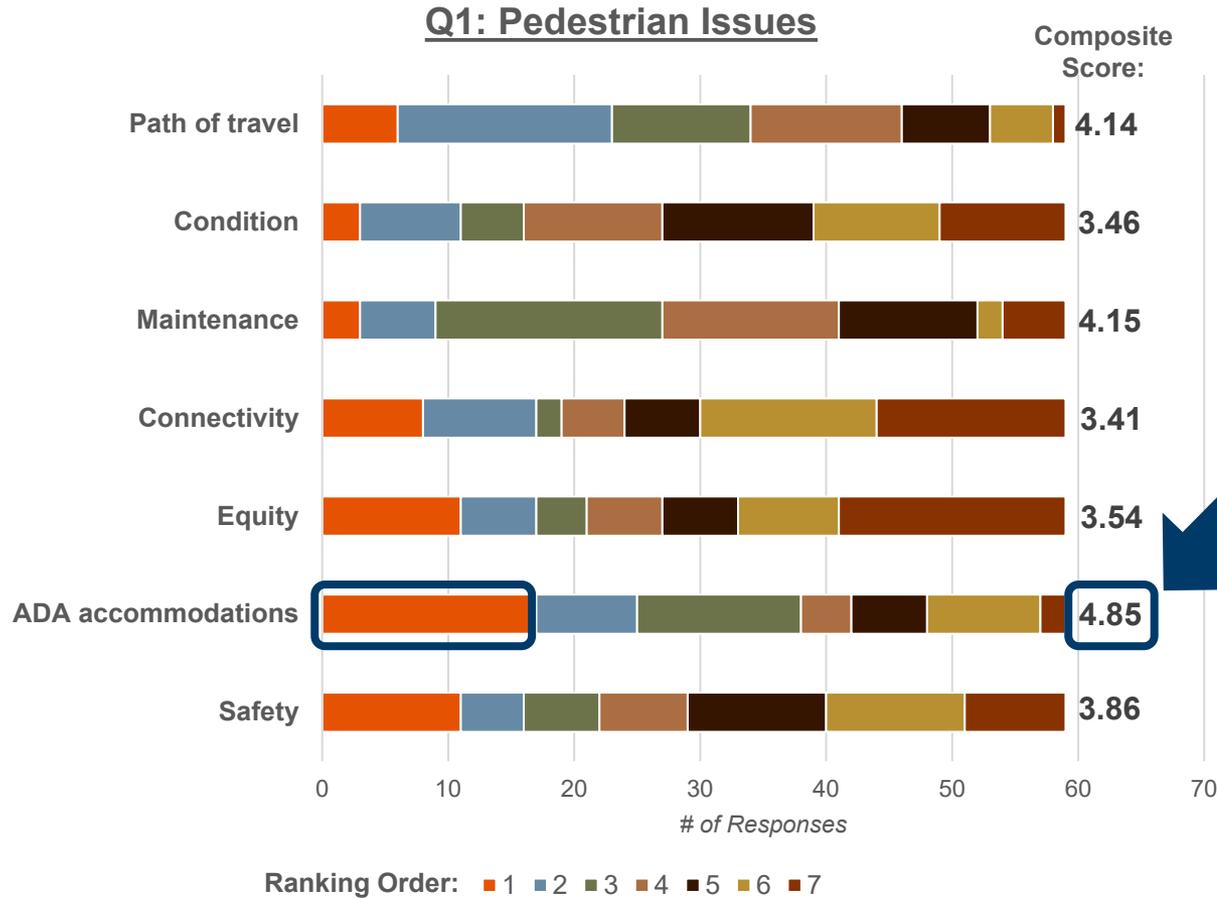
- Integrate process improvements
- Focus on public and stakeholder involvement
- Conduct Department-wide coordination
- Demonstrate progress

Survey Feedback

Survey Feedback

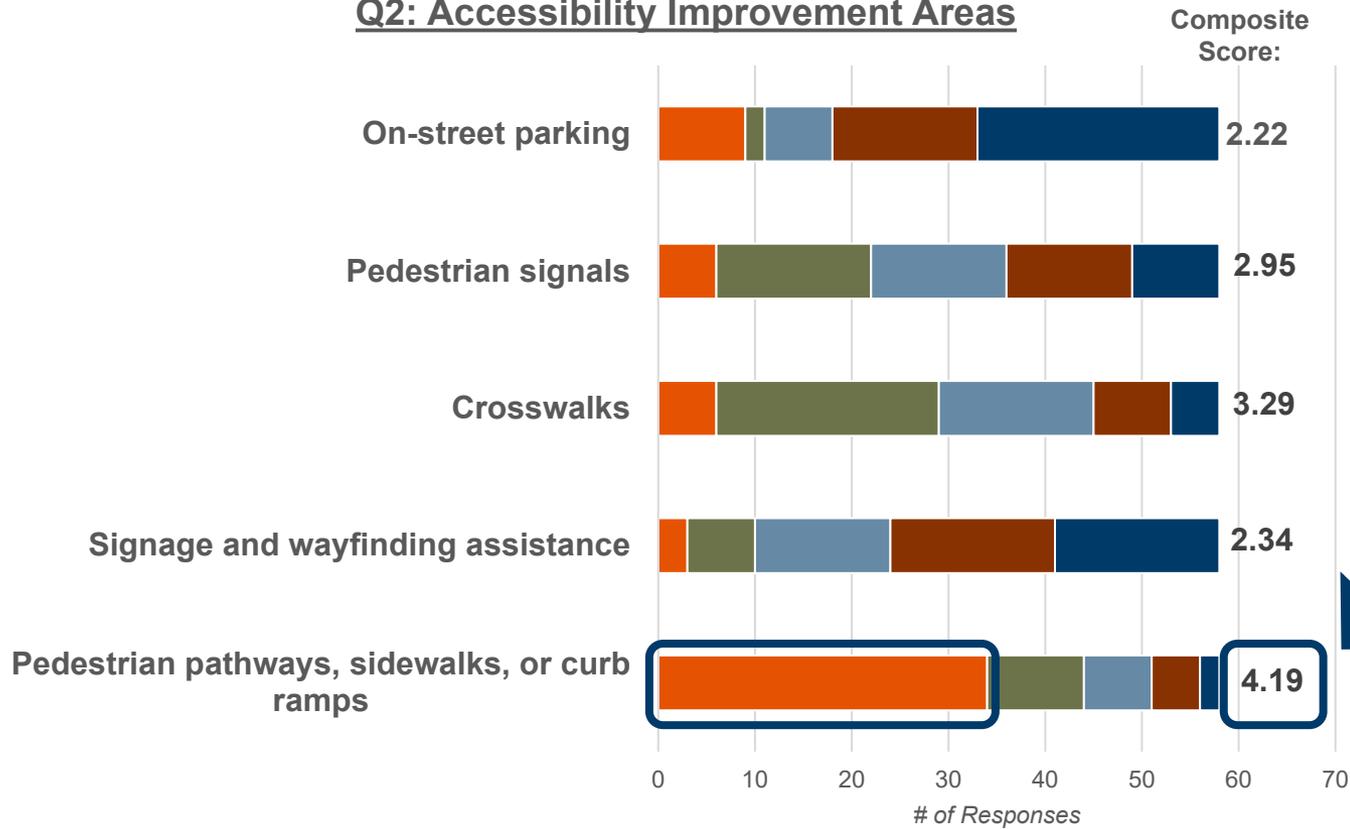
- **March 31 to April 16, 2021**
- **69 Participants**
 - **All disability categories** represented; 65% do not have a disability
 - 33 cities/towns; **23 of 56 MT counties**
 - **Ages 19-65+**
 - **All community settings** represented (41% city, 25% small town, 13% rural)

Survey Feedback



Survey Feedback

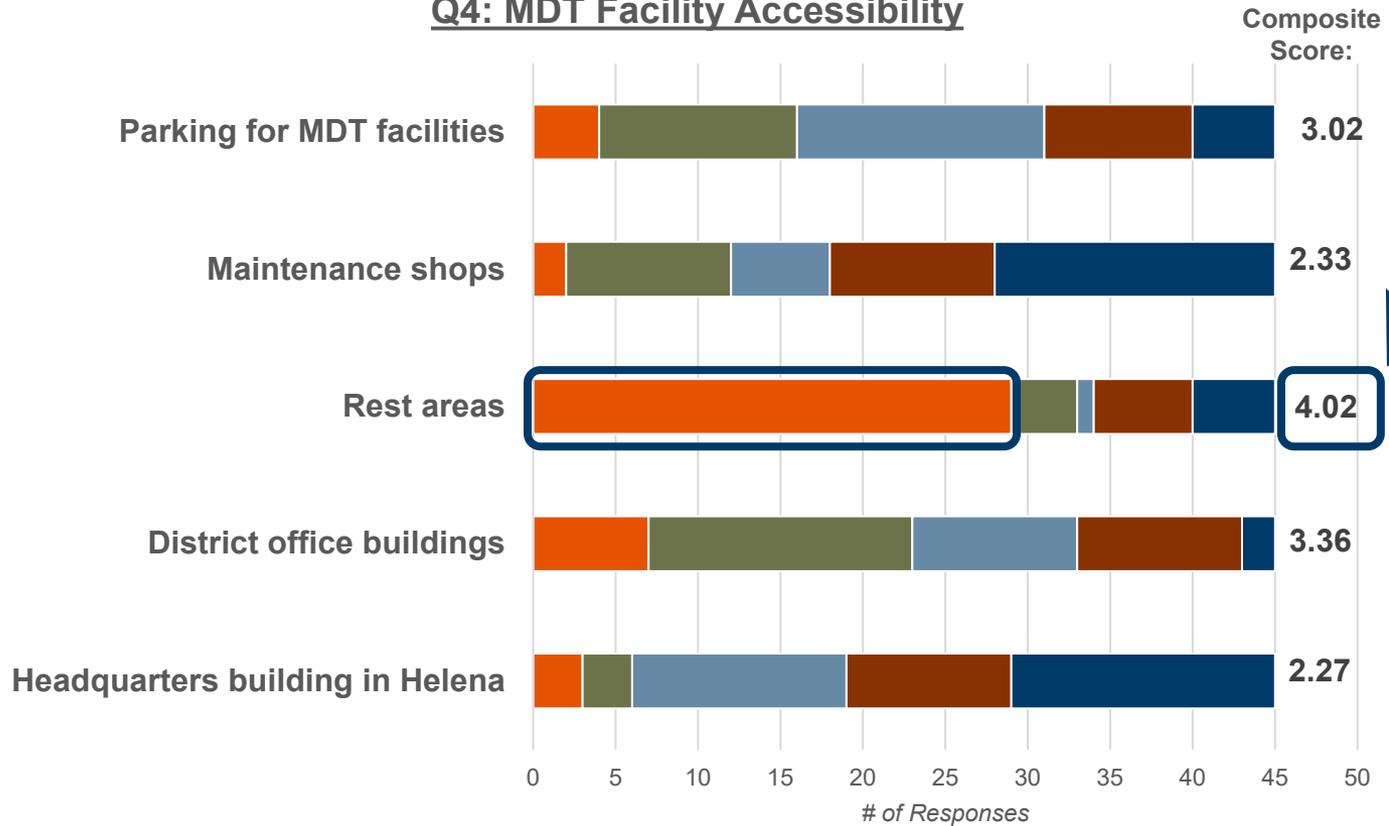
Q2: Accessibility Improvement Areas



Ranking Order: 1 2 3 4 5

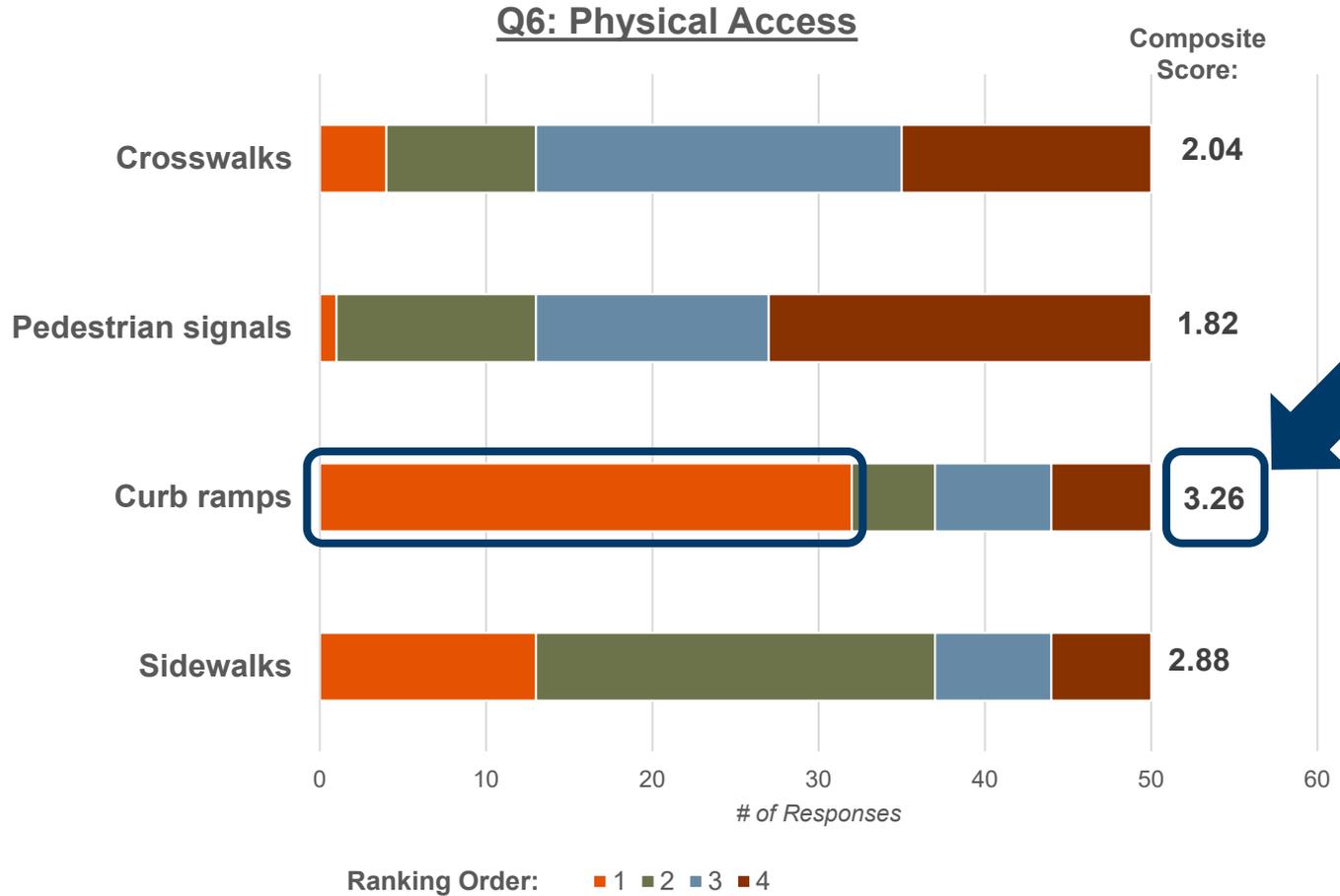
Survey Feedback

Q4: MDT Facility Accessibility



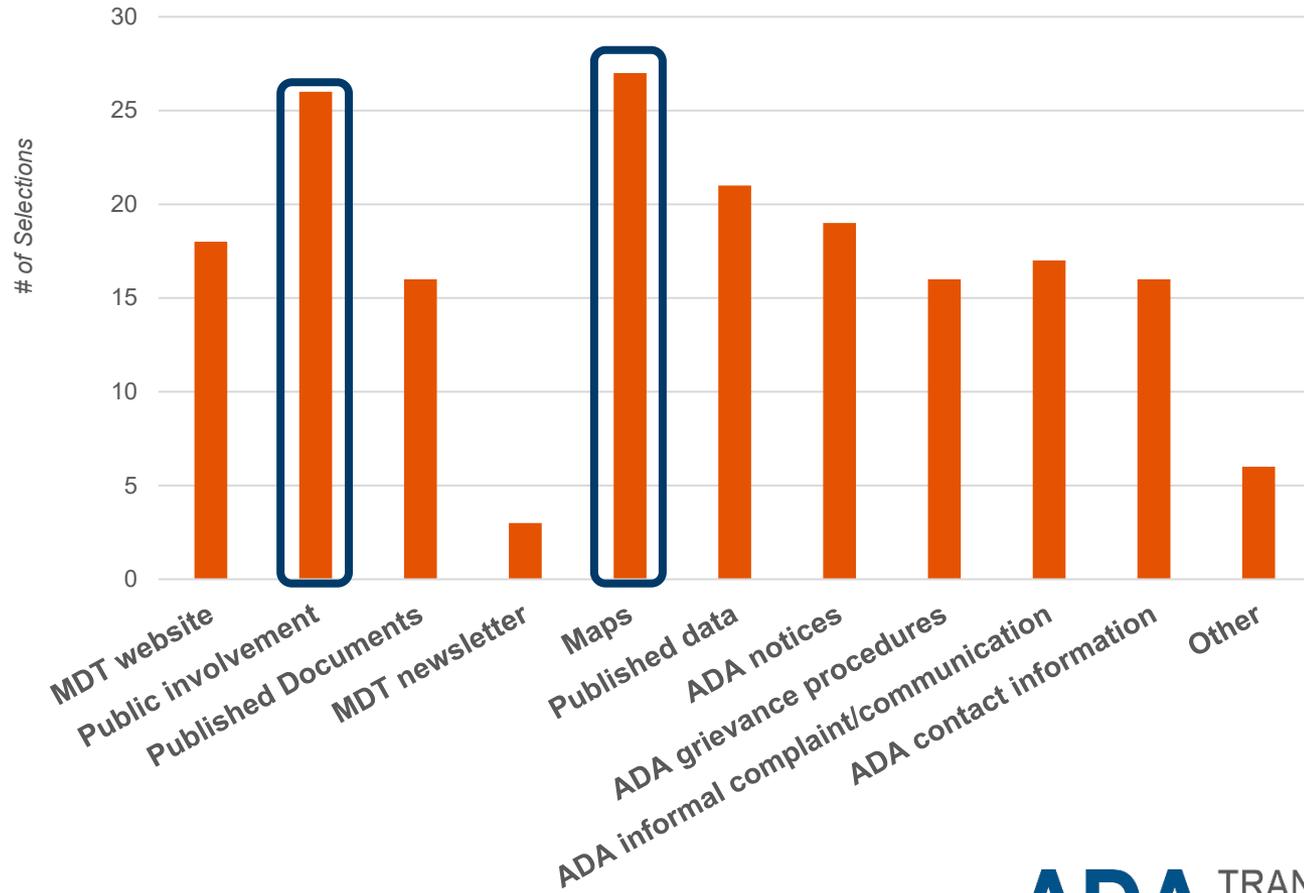
Ranking Order: 1 2 3 4 5

Survey Feedback



Survey Feedback

Q7: Program Accessibility



Website Review and Future Feedback

Website Review



Traveler Info	Construction	Plans & Studies	Services
<ul style="list-style-type: none">Travel Conditions & MapsTraveler SafetyCamerasWeatherTravel Info Mobile App	<ul style="list-style-type: none">Active ProjectsContracting & BiddingConsulting	<ul style="list-style-type: none">TranPlanMTSafety PlansMAP-21 / TA ProgramCorridor StudiesEnvironmental StudiesStatewide Transportation Improvement Program (STIP)MDT Performance TrackingADA Transition Plan Update	<ul style="list-style-type: none">2021 Legislative InformationAviation in MontanaFTP siteMotor Carrier PermitsMotor Fuel RefundsOrder a Highway Map
MORE TRAVELER INFO...	MORE CONSTRUCTION...	MORE PLANS ...	MORE SERVICES...



Website Review

Office of Civil Rights

External ADA

MDT must ensure that all of its programs, services and activities are accessible to and usable by individuals with disabilities. The External Americans with Disabilities Act (ADA) program ensures that people with disabilities have equitable opportunities to use the public rights-of-way system. This program is responsible for implementing MDT's Transition Plan, which guides MDT's efforts to provide an accessible transportation system within the state of Montana.

Reports

ADA Transition Plan Update

MDT is currently updating the ADA Transition Plan. [Click here to learn more.](#)

MDT encourages comments on the Transition Plan Update anytime throughout the year as various ADA-related transportation issues arise

Comments can be provided in the following ways:

[Online Comment Form](#) (select ADA Related Topic in the project dropdown list)

Email: mmaze@mt.gov

Phone: 406-444-5416

Mail:

Montana Department of Transportation

Office of Civil Rights

PO Box 201001

Helena, MT 59620

Forms

[Title VI/ADA Section 504 - Complaint Procedures and Form](#)

Helpful Links

OCR Staff

[OCR Contacts](#)

Program Quick Links

Affirmative Action

[5 Year Plan](#)

Contractor Compliance

[Bulletin Board Materials](#)

[EEO Policy Statement | Form](#)

[EEO Submission List](#)

[FHWA 1391 Annual Workforce Report](#)

[Training Special Provisions/OJT](#)

DBE

[Interested in DBE?](#)

[Already DBE Certified](#)

[Doing Business with DBEs](#)

[DBE Directory](#)

[2016 Disparity Study](#)

External ADA

[2021 Transition Plan Update](#)

[2016 Transition Plan](#)



Website Review



Overview

MDT is updating the *Americans with Disabilities Act (ADA) Transition Plan*, which directs the department's efforts to provide an accessible transportation system within the state of Montana. Periodic updates of the plan are beneficial to ensure continuous improvement through incorporation of new technologies, streamlined processes, and modernized approaches that best meet MDT's needs and operating conditions.

The plan aims to establish a consistent approach for accommodating disabled individuals by identifying methods to assist MDT in complying with ADA regulations and removing accessibility barriers throughout the state. *The plan is not intended to identify specific projects or barrier locations.*

While MDT encourages comments at any time as accessibility-related transportation issues arise, the plan update presents an opportunity for targeted outreach on this topic to better understand needs and concerns from the perspective of disabled users, disability advocates, and other stakeholders and interested members of the public.

Links

- [Overview](#)
- [FAQs](#)
- [Schedule](#)
- [Documents](#)
- [Other Resources](#)
- [MDT Online Comment Form](#)

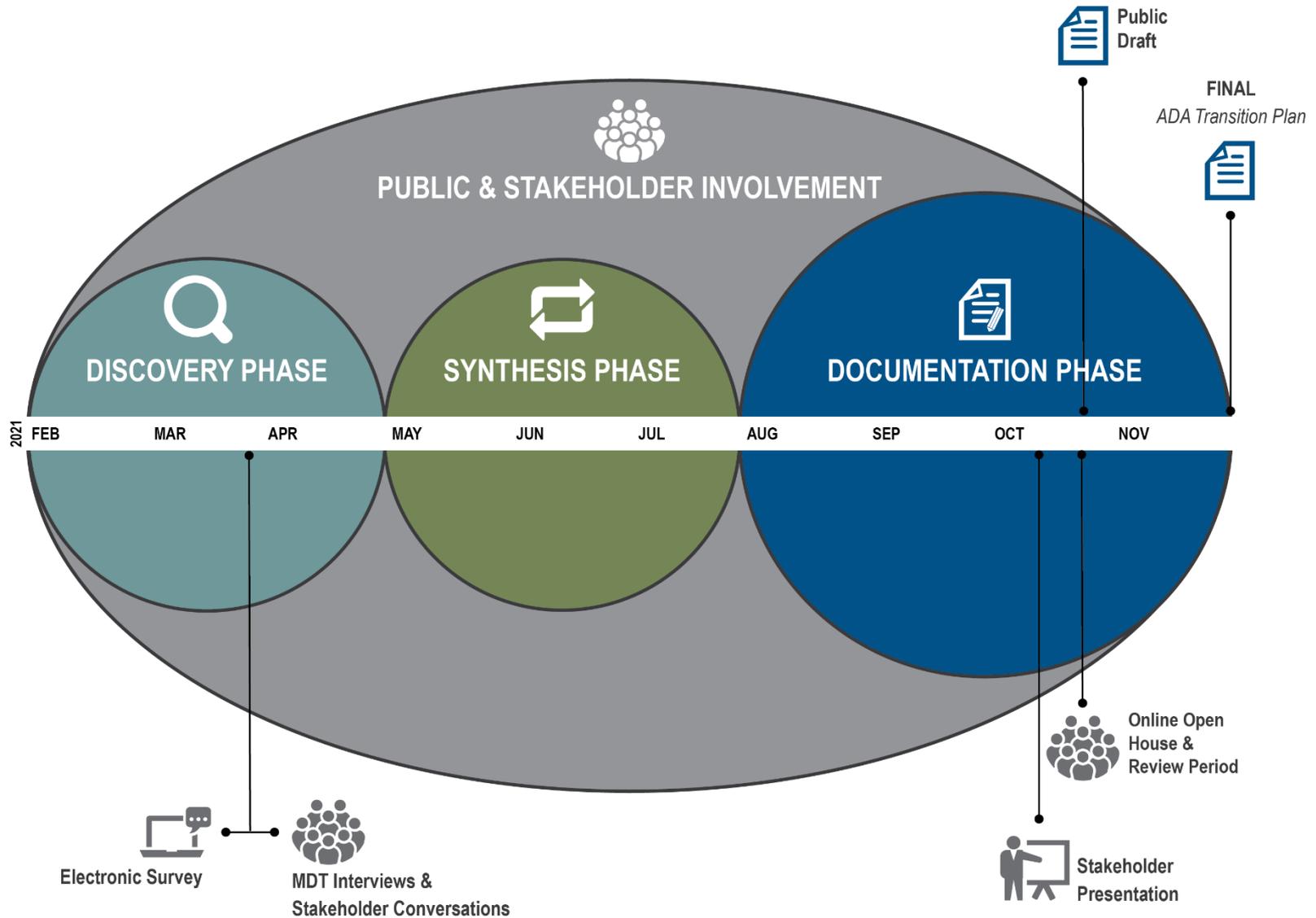
Contacts

Ben Murphy
MDT Project Manager
2701 Prospect Ave
PO Box 201001
Helena, MT 59620
[406-444-7294 | Email](mailto:ben.murphy@mt.gov)

Sarah Nicolai, PE, PTP
Consultant Project Manager
3147 Saddle Drive
Helena, MT 59601
[406-447-5038 | Email](mailto:sarah.nicolai@mt.gov)

Matt Maze
MDT External ADA Coordinator
2701 Prospect Ave
PO Box 201001
Helena, MT 59620
[406-444-5416 | Email](mailto:matt.maze@mt.gov)

Schedule



Study Contacts



Ben Murphy
MDT Project Manager
(406) 444-7294
bemurphy@mt.gov



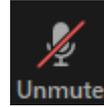
Sarah Nicolai
RPA Project Manager
(406) 447-5038
snicolai@rpa-hln.com



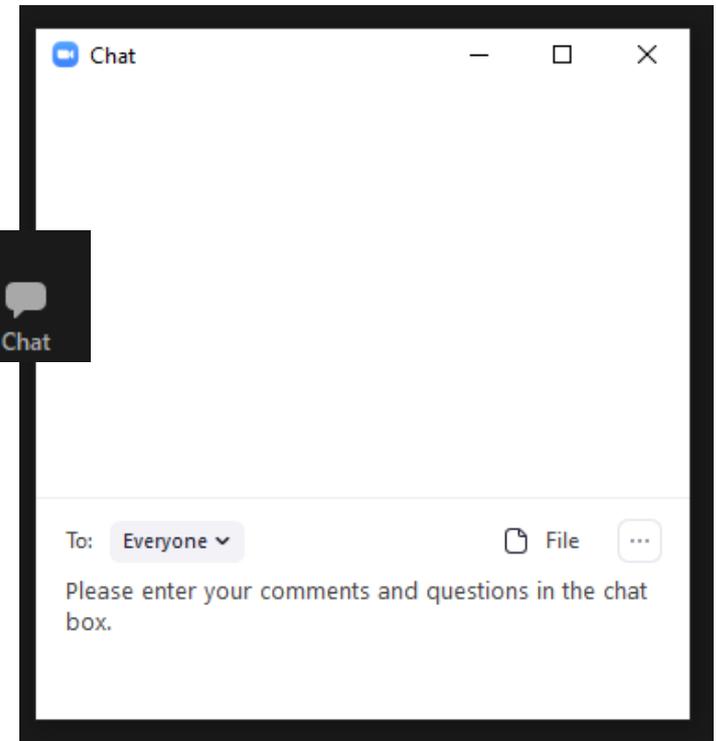
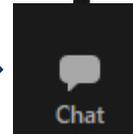
Matt Maze
External ADA Coordinator
(406) 444-5416
mmaze@mt.gov

Questions & Answers

To **speak**, click the unmute button:



To **type** a question, click on the chat button:



To enable everyone to participate, please **keep comments brief**

ADA TRANSITION PLAN UPDATE

Montana Department of Transportation



APPENDIX B2-c:

Stakeholder Outreach Email
Announcement

Greetings!

The Montana Department of Transportation (MDT) is updating its Americans with Disabilities Act (ADA) Transition Plan, which outlines the Department's efforts to remove accessibility barriers on MDT maintained routes, at MDT building facilities, and in MDT's public programs and services. MDT is holding two online stakeholder input sessions, Monday May 10th from 2 – 3 pm and Tuesday May 11 from 6 – 7 pm. The outline of both the sessions will be the same. Please feel free to forward this message.

For more information on the plan update, please visit the website at <https://www.mdt.mt.gov/pubinvolve/ada/>. For alternative accommodations, please contact Matt Maze, Office of Civil Rights, P.O. Box 201001, Helena, Montana 59620; telephone (406) 444-5416; Montana Relay 711; facsimile (406) 444-7243; or e-mail to mmaze@mt.gov.



Matt Maze

External ADA Specialist | Office of Civil Rights
Montana Department of Transportation
2701 Prospect Avenue
P.O. Box 201001
Helena, MT 59620
406-444-5416

mmaze@mt.gov



MEETING AGENDA

MDT Stakeholder Input

MEETING GOALS

The purpose of this meeting will be to provide an overview of the Montana Department of Transportation's (MDT) ADA Transition Plan and provide an opportunity for stakeholders to discuss or comment on ways MDT can improve the plan and program components.

MEETING DETAILS

Date: Monday, May 10, 2021

Time: 2:00 PM – 3:00 PM

Call-in: #646-558-8656
Meeting ID: 406 540 1101
Passcode: 5401101

Link: <https://mt-gov.zoom.us/j/4065401101?pwd=WDQ0akpvYyt1cEw1QkVNdE1ISzR5UT09>

AGENDA ITEMS

- I. **Welcome and Introductions**
- II. **[Transition Plan Overview](#)**
- III. **Survey Feedback**
- IV. **[Website Review](#) and Future Feedback**

For alternative accommodations, please contact Matt Maze, Office of Civil Rights, P.O. Box 201001, Helena, Montana 59620; telephone (406) 444-5416; Montana Relay 711; facsimile (406) 444-7243; or e-mail to mmaze@mt.gov.

MEETING AGENDA

MDT Stakeholder Input

MEETING GOALS

The purpose of this meeting will be to provide an overview of the Montana Department of Transportation's (MDT) ADA Transition Plan and provide an opportunity for stakeholders to discuss or comment on ways MDT can improve the plan and program components.

MEETING DETAILS

Date: Tuesday, May 11, 2021

Time: 6:00 PM – 7:00 PM

Call-in: #646-558-8656
Meeting ID: 406 540 1101
Passcode: 5401101

Link: <https://mt-gov.zoom.us/j/4065401101?pwd=WDQ0akpvYyt1cEw1QkVNdE1ISzR5UT09>

AGENDA ITEMS

- I. **Welcome and Introductions**
- II. **[Transition Plan Overview](#)**
- III. **Survey Feedback**
- IV. **[Website Review](#) and Future Feedback**

For alternative accommodations, please contact Matt Maze, Office of Civil Rights, P.O. Box 201001, Helena, Montana 59620; telephone (406) 444-5416; Montana Relay 711; facsimile (406) 444-7243; or e-mail to mmaze@mt.gov.

ADA TRANSITION PLAN UPDATE

Montana Department of Transportation



APPENDIX B3:

Stakeholder Outreach - October 2021

Appendix B3-a: Stakeholder Outreach Summary

Appendix B3-b: Stakeholder Meeting Presentation

Appendix B3-c: Stakeholder Outreach Email Announcement

ADA TRANSITION PLAN UPDATE

Montana Department of Transportation



APPENDIX B-3a:

Stakeholder Outreach Summary

MEETING SUMMARY

MDT Stakeholder Meeting – October 28, 2021

MEETING GOALS

The purpose of this meeting was to present an overview of the draft update to the Montana Department of Transportation (MDT) ADA Transition Plan and provide an opportunity for stakeholder questions and comments.

MEETING DETAILS

The meeting was held on Thursday October 28, 2021, using the Zoom platform. The meeting began at 2:00 PM with a presentation summarizing the updated transition plan, key findings, recommendations, progress since 2016, and updated scoring methodology. The meeting was followed by an informal question and answer session with the project management team. The meeting concluded at 3:00 PM.

AGENDA ITEMS

- 1) **Welcome and Introductions**
- 2) **Transition Plan Overview**
- 3) **Key Findings, Recommendations, and Progress**
- 4) **Updated Scoring Process**
- 5) **Feedback Opportunities**

ATTENDEES

Participants were required to pre-register for the meeting. A total of 13 participants (besides the project management team) pre-registered but only 10 attended.

- **Sarah Nicolai** – Robert Peccia and Associates (RPA)
- **Kerry Pedersen** – RPA
- **Ben Murphy** – MDT
- **Sheila Ludlow** – MDT
- **Matt Maze** – MDT
- **Megan Handl** – MDT
- **Travis Saner** – Wyoming Department of Transportation
- **Charles Alvarez** – Montana Independent Living Center (MILP)
- **Colleen Forrester** – North Central Independent Living (NCIL) Glasgow, Independent Living Transportation (ILT) Task Force
- **Desiree Dean-Kaldor** – Montana Department of Public Health & Human Service (DPHHS) Disability Employment and Transitions
- **Cindy Dye** – Montana DPHHS

ADA Transition Plan Update

- **Shyla Patera** – NCIL Great Falls, ILT Task Force
- **Cassie Weightman** – MILP Butte
- **Meg Traci** – University of Montana Rural Institute
- **Mikaela Schultz** – City of Bozeman, Engineering
- **Travis Hoffman** – Summit Independent Living Center

DISCUSSION SUMMARY

Meeting attendees discussed the following topics.

- Have the benchmarked states adopted ADAAG? Oops-- I didn't mean ADAAG, I meant PROWAG-- were state plans to benchmark selected because they have also adopted PROWAG? Were there other selection criteria.
 - MDT's Office of Civil Rights (OCR) recommended three programs to review because they have strong relationships with these state departments of transportation. Colorado and Ohio have officially adopted PROWAG, while Florida has not adopted PROWAG, but it has incorporated PROWAG principles into their standards and policy.
 - OCR also liked aspects of other states' programs and processes and wanted to explore how certain items addressed in their transition plans could be applied or considered in Montana.
- How is maintenance factored into the scoring, e.g., ramp is fully compliant but regularly collects snow, ice and debris?
 - Environmental conditions are seasonal and are thus not factored into scoring. The scores are intended to reflect design and construction elements. However, MDT does recognize the need for maintenance of pedestrian facilities year-round. Both MDT and local jurisdictions (through maintenance agreements) conduct regular maintenance on pedestrian facilities within MDT right-of-way.
- What about a ramp that intersects with cross walk prone to crowning?
 - The scoring methodology does not incorporate crosswalks because a statewide inventory of crosswalks does not currently exist. This could potentially be a future area of focus.
 - OCR looks at specific areas as brought forward by the public. The curb ramp inventory is a good baseline for identifying areas of concern so MDT can address broader issues.
- If a curb ramp connects thru an accessible cross walk to another curb ramp, is the score higher than a curb ramp that does not connect to an accessible route?
 - While connectivity was not directly addressed in the scoring, the curb ramp data is a baseline and helps MDT package projects to address broader accessibility and connectivity issues. It was also clarified that higher scores indicate more barriers.
- In Butte, signs are a barrier, and many are placed in the sidewalk. This is a problem, especially in areas where the sidewalk isn't wide enough to begin with.
- MDT should address pavement preservation and sidewalk widths. Sometimes pedestrians have to walk in the street because sidewalks are disconnected or poorly maintained. If the pavement is not in good condition, this is a barrier.
- Is MDT going to conduct a signal inventory?
 - Accessible pedestrian signals have been inventoried and are included in curb ramp scores. MDT has also included many accessible pedestrian signals in recent ADA projects, as shown in the progress graphics. OCR also coordinates with MDT Traffic and Safety to ensure the needs of all users are addressed with traffic and safety projects.

ADA Transition Plan Update

- MDT should look at self-driving vehicles and other emerging technologies and how these technologies accommodate people with disabilities.
- Pedlets can also be a barrier to accessibility when walking on the sidewalk, especially in the summer.
- Will updates to standard drawings be included as part of the plan?
 - RPA conducted interviews with designers (both in-house and consultants) to look at the existing design standards at a high level. A summary of the relevant standards is available in the transition plan. Any changes to these standard drawings would be conducted separately from the plan update.

ADA TRANSITION PLAN UPDATE

Montana Department of Transportation



APPENDIX B3-b:

Stakeholder Meeting Presentation

ADA TRANSITION PLAN UPDATE

Montana Department of Transportation



Stakeholder Meeting

October 28, 2021

Meeting Agenda & Format

Presentation

1

Welcome & Introductions

2

Administrative Draft ADA Transition Plan

- Overview & Key Updates
- Scoring Process & Results

3

Progress Since 2016

4

Feedback Opportunities

5

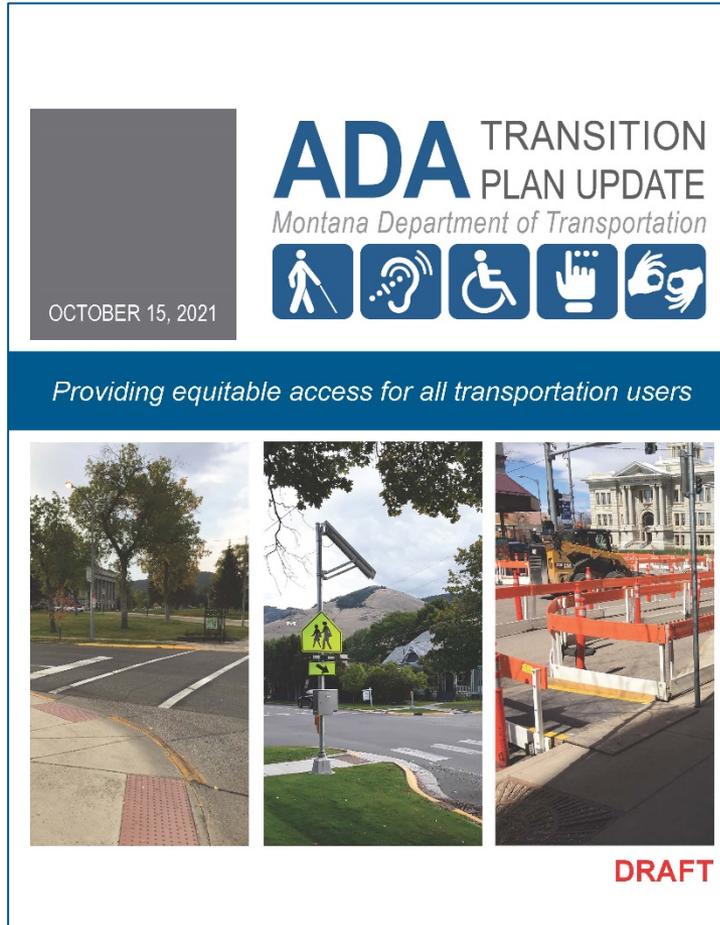
Schedule & Next Steps

Question & Answer Period

Introductions

Transition Plan Overview

What is the ADA Transition Plan?



Provides guidance for
**removing
barriers to
accessibility**

in the public right-of-way on
MDT-maintained routes and
across MDT's public
programs and services

What elements are addressed?

- **Existing and Newly Constructed Features**

- **Right-of-Way Features**

- Curb Ramps
 - Sidewalks
 - Crosswalks
 - Pedestrian Activated Signals

- **Building Facilities**

- MDT Headquarters (Helena)
 - District Office Buildings
 - Rest Areas
 - Airports
 - Maintenance Buildings
 - Scale Sites

- **MDT Programs, Services, and Activities**

What Methods are addressed?

- **Administration**
 - External ADA program management
- **Communications**
 - Eliminate communication barriers, provide auxiliary aids
- **Right-of-way Features**
 - ADA Inventory
 - Project Identification
 - Design and Construction
 - Operation and Maintenance
- **Building Facilities**
 - ADA Inventory
 - Design, Construction, Maintenance

What is not addressed in the ADA Transition Plan?



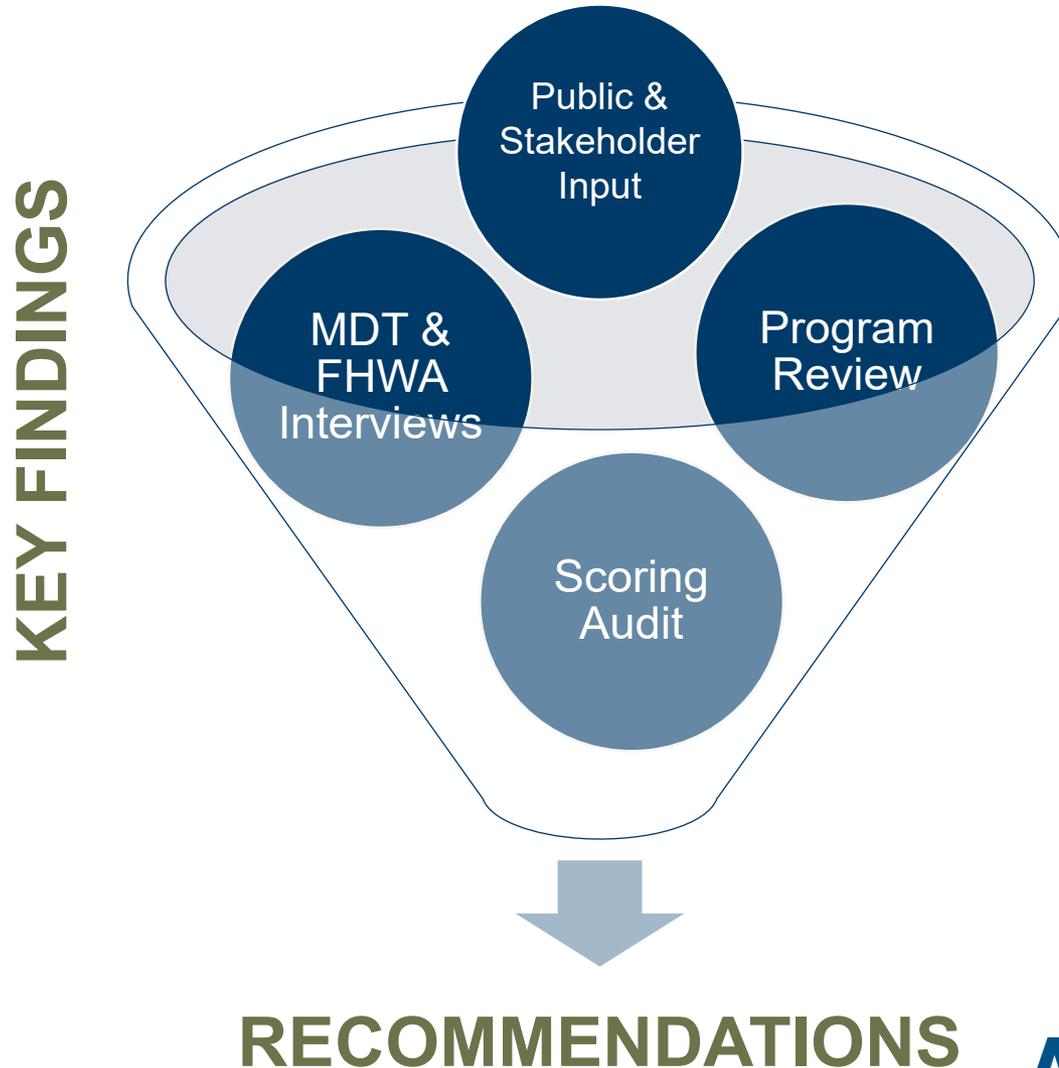
- Specific project locations
- Local right-of-way features and facilities
- Internal MDT employment accessibility

Goals and Purpose of Plan Update



- Integrate process improvements
- Focus on public and stakeholder involvement
- Conduct Department-wide coordination
- Demonstrate progress

What was our process?



What did we hear?

Key Areas of Concern:

-  Pedestrian pathways, sidewalks, curb ramps
-  Rest areas
-  Public involvement
-  Data and maps

Desired Improvements:

-  Additional communication with disability community
-  Walk audits
-  Pedestrian route connectivity
-  Winter maintenance

What did we hear?

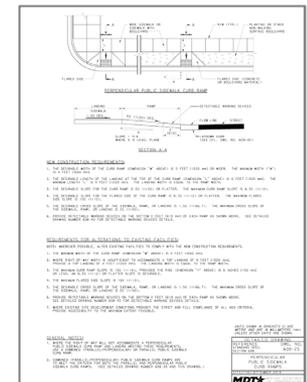
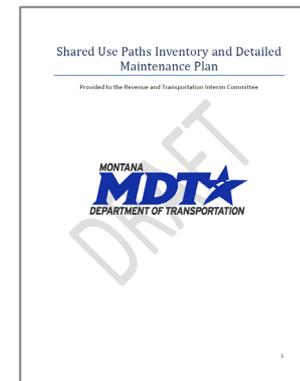
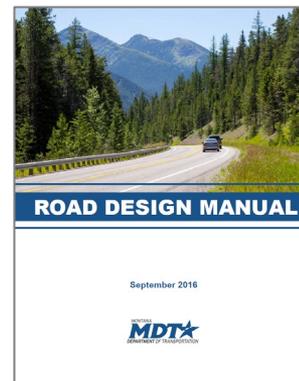
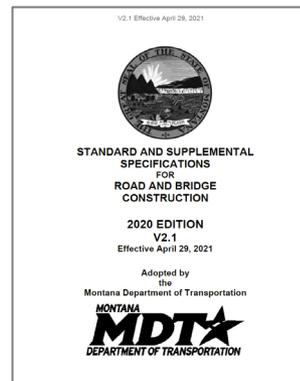
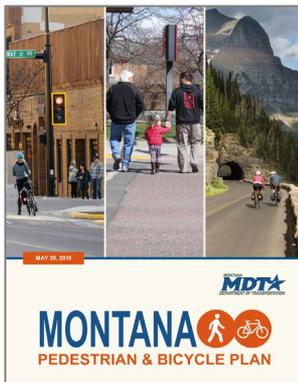
1. A centralized set of **ADA references** is desired.
2. Elements of the 2016 plan **no longer reflect** how the MDT ADA Program operates.
3. An **updated scoring** process is desired.

Key Updates

What did we change?

NEW Section 1.3

- Summarizes related plans and documents
- Centralized list of ADA-related resources used by MDT



What did we change?



Updated Plan Methods

- Parts of the previous plan no longer reflected how the MDT ADA Program operates today.
- Addressed areas of public concern
- Substantive updates to 19 of 32 methods

What did we change?



Updated Scoring Methodology

- Sets a maximum total score of 100 for each curb ramp
- Compares scores by MDT District, county, urban areas, and communities

Updated Scoring Process & Results

Scoring Goals



Purpose

- Compare compliance status by groupings
- Classify barriers to assist in making project development decisions given available resources
- Demonstrate progress



Process Goals

- Repeatable
- Explainable
- Easy to conduct



Output Goals

- Meaningful
- Comparable
- More reflective of compliance spectrum

Summary - Scoring Ranges

DEMAND



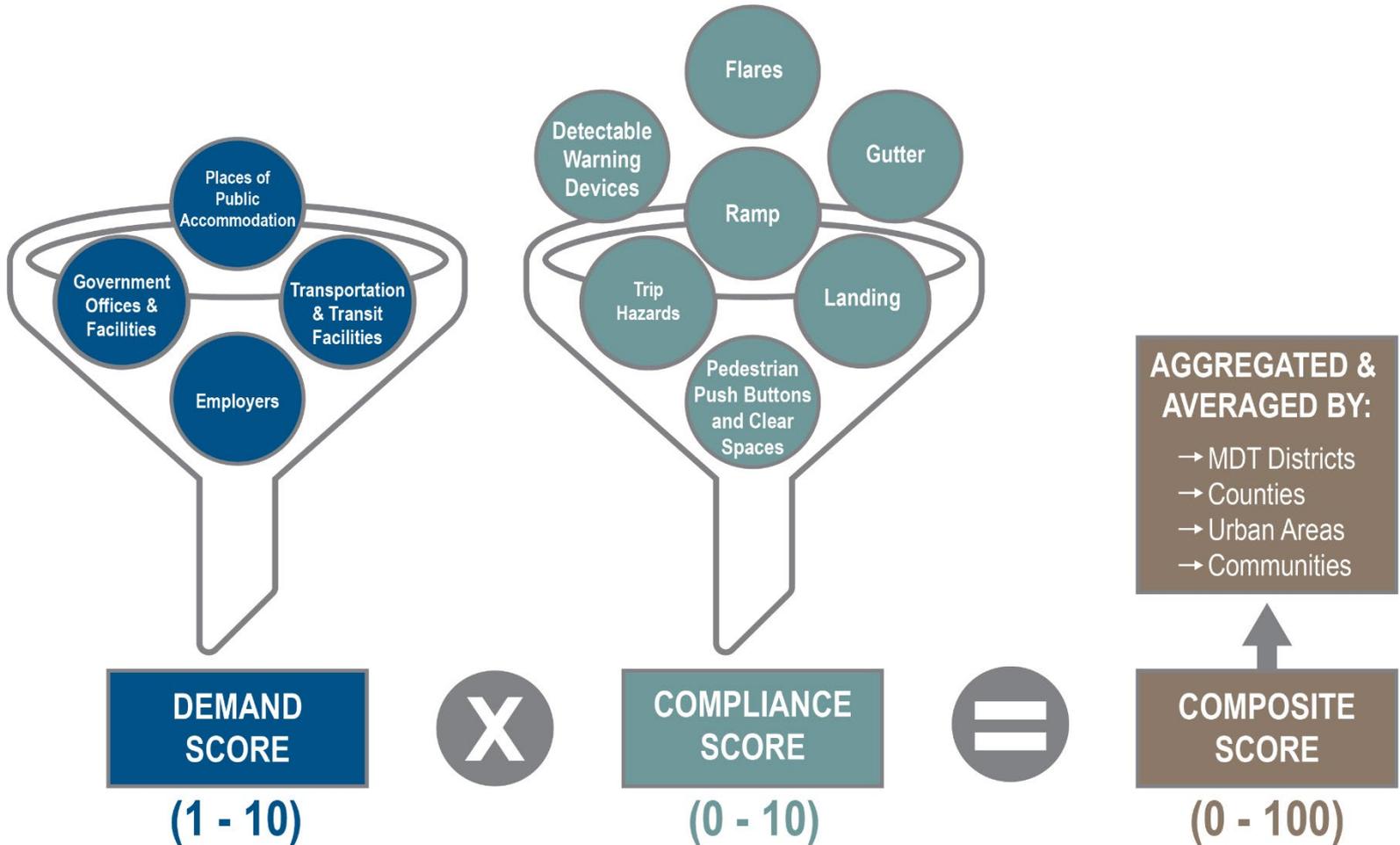
COMPLIANCE



COMPOSITE



Summary – Modified Procedure



Reporting

Boundaries

- MDT Districts
- Counties
- Urban Boundaries
- Incorporated Communities

Summary Statistics

- Number of Ramps
- Average Compliance
- Average/Aggregate Composite
- Average Element Scores

Reporting by Urban Area

Urban Area	Number of Ramps	Average Compliance Score	Average Composite Score	Sum Composite Score
Anaconda	291	1.68	9.94	2893.00
Belgrade	173	3.99	25.12	5104.00
Billings	890	2.61	13.06	13967.00
Bozeman	580	4.62	8.66	7102.00
Butte	587	3.02	18.23	10699.00
Columbia Falls	137	3.12	10.13	1810.00
Glendive	100	5.93	40.79	3064.00
Great Falls	1,455	2.61	10.05	19405.00
Hamilton	173	5.85	24.56	3431.00
Havre	286	2.89	12.21	2869.00
Helena	883	3.31	14.55	13783.00
Kalispell	710	4.01	16.33	12549.00
Laurel	83	3.31	12.39	1203.00
Lewistown	220	2.75	17.81	3586.00
Livingston	111	2.55	11.15	1451.00
Miles City	248	3.52	27.62	8710.00
Missoula	1,695	2.21	7.61	17094.00
Sidney	204	4.65	14.43	3407.00
Whitefish	192	3.18	12.82	2243.00
TOTAL	9,018	3.46	16.18	134370.00

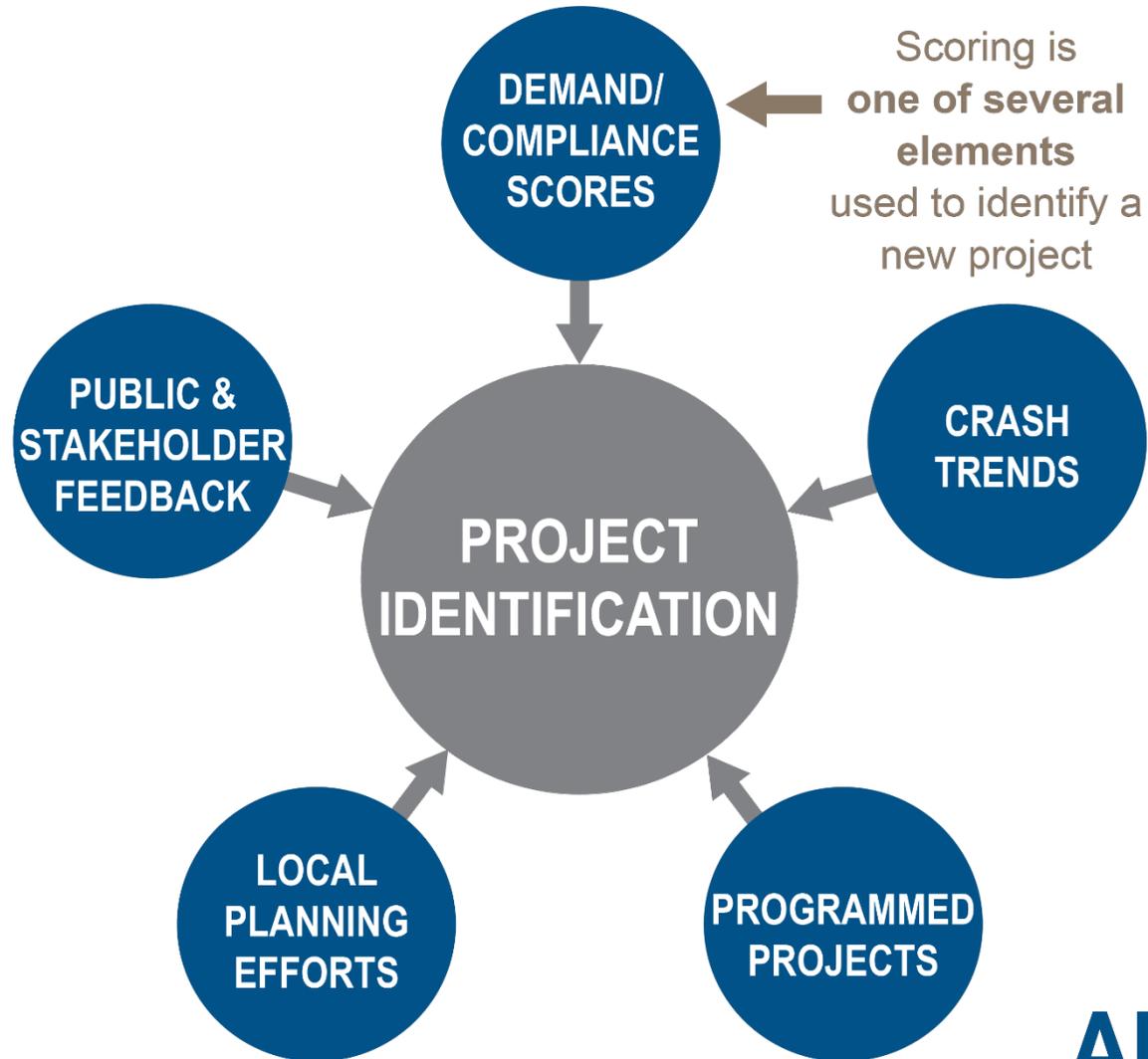
Scale of 0-10

Scale of 0-100

No Scale

Higher score = more barriers

Project Identification



Progress in Removing Barriers to Accessibility

Inventory Status

TOTAL INTERSECTIONS	13,792
Intersections <u>Without</u> Pedestrian Facilities	10,264
Intersections <u>With</u> Pedestrian Facilities	3,528
<i>Intersections <u>Inventoried</u></i>	3,481
<i>Intersections <u>Not</u> Inventoried</i>	47
Percent Complete	99.7%
Total Ramps Inventoried	15,246

TOTAL BUILDING FACILITIES	379
Facilities <u>Not</u> Inventoried	120
Facilities <u>Inventoried</u>	251
<i>MDT Office Facilities</i>	<i>14 of 15</i>
<i>ADA Access Rest Areas</i>	<i>62 of 68</i>
<i>Parking Areas</i>	<i>2 of 14</i>
<i>State Owned Airports</i>	<i>3 of 3</i>
<i>Maintenance Houses</i>	<i>143 of 143</i>
<i>MCS: Non-Staffed</i>	<i>4 of 104</i>
<i>MCS: Staffed</i>	<i>23 of 24</i>
Percent Complete	67.7%

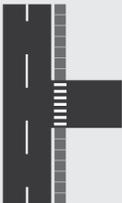
**As of September 2021*

Projects with ADA Features

STAND-ALONE ADA PROJECTS

 **1,546**
CURB RAMPS

~7,200
LINEAR FT
SIDEWALK

 **147**
APPROACHES
& ALLEYS

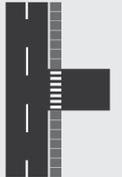
 **19**
MONTANA
COMMUNITIES

**2016 - 2021 Construction*

ADA PROJECTS AS PART OF OTHER HIGHWAY PROJECTS

 **1,544**
CURB RAMPS

~219,000
LINEAR FT SIDEWALK

 **536**
APPROACHES
& ALLEYS

 **31**
MONTANA
COMMUNITIES

435 
ACCESSIBLE
PEDESTRIAN SIGNALS

**2015 - 2021 Construction*

Feedback Opportunities

ADA TRANSITION PLAN UPDATE

Montana Department of Transportation



Virtual Open House

Welcome to the ADA Transition Plan Virtual Open House!

The purpose of this virtual open house is to explain the ADA Transition Plan update process, summarize key findings, and share relevant updates to the plan. The open house will be active from October 15, 2021, through November 5, 2021.

The [Draft ADA Transition Plan](#) is also available for public review. **Please submit all comments on the draft plan by November 5, 2021.**

Thanks for participating!

Background

Please take a few minutes to watch the video below to hear more about how MDT is working to remove accessibility barriers on MDT-maintained routes, at MDT building facilities, and across MDT's public programs and services.



Click on the [informational sheets](#) to learn more about our process, our findings, and some of the changes we made.

Links

- [Overview](#)
- [Virtual Open House](#)
- [FAQs](#)
- [Schedule](#)
- [Documents](#)
- [Other Resources](#)

[MDT Online Comment Form](#)

Contacts

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Matt Maze
MDT External ADA Coordinator
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406-444-5416 | [Email](#)



2021 TRANSITION PLAN UPDATE PROCESS

WHAT IS THE ADA TRANSITION PLAN?

Provides guidance for **removing barriers to accessibility** in the public right-of-way on State of Montana maintained routes and in the Montana Department of Transportation's (MDT) public programs and services.

Elements Addressed:

- Existing and Newly Constructed Features
 - Right-of-Way Features (Curb Ramps, Sidewalks, Crosswalks, Pedestrian Activated Signals)
 - Building Facilities (MDT Headquarters, District Offices, Rest Areas, Airports, Maintenance Buildings, Scale Sites)
- MDT Programs, Services, and Activities



Elements NOT Addressed:

- Specific project locations
- Local right-of-way features and facilities
- Internal MDT employment accessibility

GOALS AND PURPOSE OF PLAN UPDATE

Periodic updates of the plan are beneficial to ensure continuous improvement through incorporation of new technologies, streamlined processes, and modernized approaches that best meet MDT's needs and operating conditions. With this update, MDT aims to reinforce its priority to remove accessibility barriers. The following goals support this aim.

- Integrate process improvements
- Focus on public and stakeholder involvement
- Conduct Department-wide coordination
- Demonstrate progress

www.mdt.mt.gov/pubinvolve/ada/

Draft Transition Plan

ADA TRANSITION PLAN UPDATE
Montana Department of Transportation

OCTOBER 15, 2021



Providing equitable access for all transportation users



DRAFT

**Public and
Stakeholder
Review Period**
October 15 - November 5

Please submit comments by:
NOVEMBER 5, 2021

How to Submit Comments

Links

- [Overview](#)
- [Virtual Open House](#)
- [FAQs](#)
- [Schedule](#)
- [Documents](#)
- [Other Resources](#)

[MDT Online Comment Form](#)

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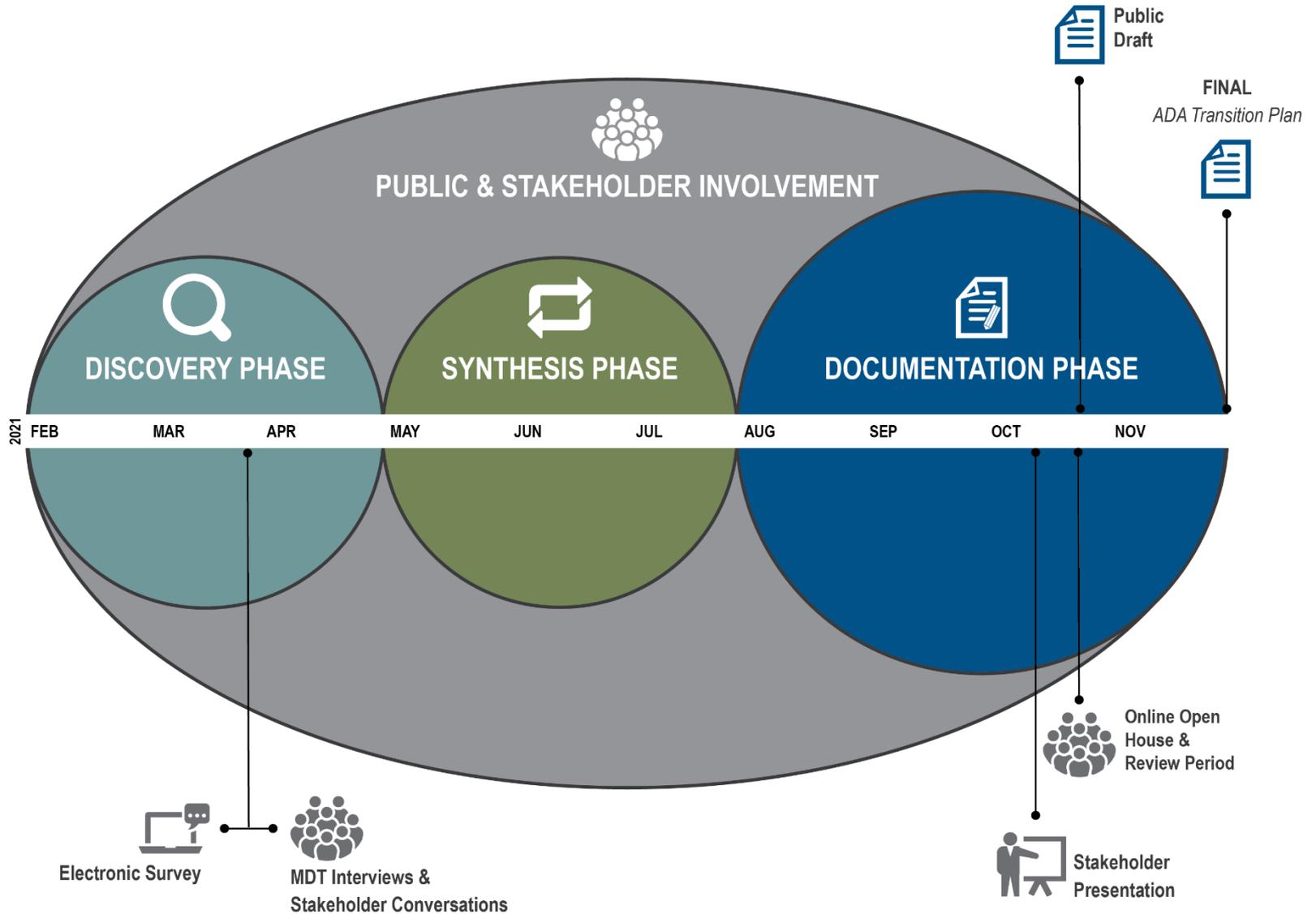


Comment Form



Email

Schedule



Study Contacts



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Matt Maze

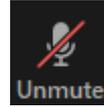
External ADA Coordinator

(406) 444-5416

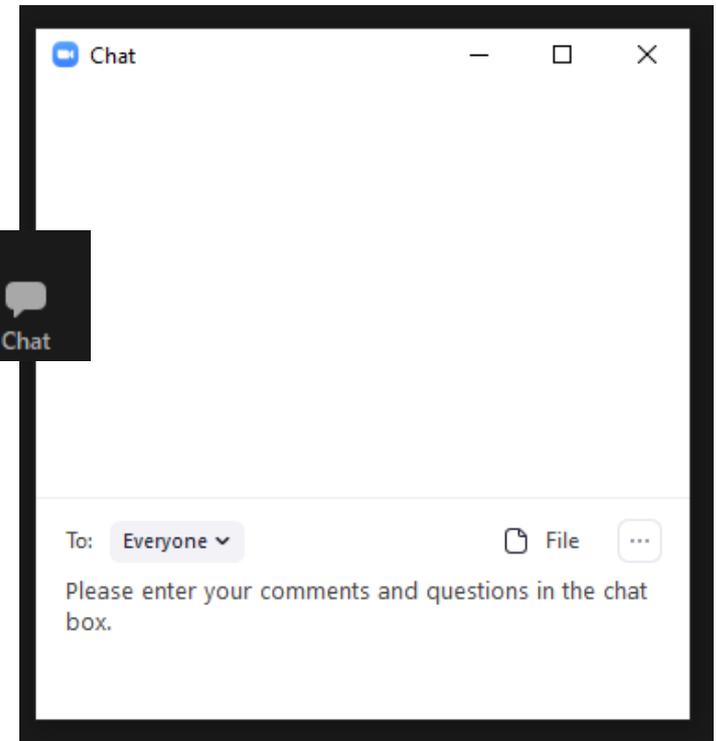
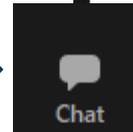
mmaze@mt.gov

Questions & Answers

To **speak**, click the unmute button:



To **type** a question, click on the chat button:



To enable everyone to participate, please **keep comments brief**

ADA TRANSITION PLAN UPDATE

Montana Department of Transportation



APPENDIX B3-c:

Stakeholder Outreach Email
Announcement

Greetings!

The draft 2021 update to the Montana Department of Transportation (MDT) *Americans with Disabilities Act (ADA) Transition Plan* is now available for public review and comment. The plan outlines the Department's efforts to remove barriers to accessibility on MDT maintained routes, at MDT building facilities, and across MDT's public programs and services. You can view the draft plan at <https://www.mdt.mt.gov/pubinvolve/ada/>.

MDT is holding an online stakeholder input session to provide an overview of the draft plan and collect feedback. The agenda for this session is attached. Feel free to forward this message to others who may be interested in attending. This meeting will be recorded for those unable to attend.

ADA Transition Plan Stakeholder Outreach

When: Thursday, October 28, 2021, at 2:00 PM

How to Attend: Pre-registration is required to attend the meeting. You can register at: <https://mt-gov.zoom.us/meeting/register/tZAtdOusrD8sHdO-MBX-3ZVkpYh2Glb3LVHC>. After registering, you will receive a confirmation email with details for joining the meeting.

MDT is also hosting a 3-week long virtual open house to explain the update process, summarize key findings, and share relevant updates to the plan. You are invited to participate in the open house and submit comments at your convenience over the three-week period from October 15 through November 5, 2021.

To review the plan, participate in the open house, and submit comments, please visit the website at <https://www.mdt.mt.gov/pubinvolve/ada/>. For alternative accommodations, please contact Matt Maze, Office of Civil Rights, P.O. Box 201001, Helena, Montana 59620; telephone (406) 444-5416; Montana Relay 711; facsimile (406) 444-7243; or e-mail to mmaze@mt.gov.

We look forward to your feedback!



Matt Maze

External ADA Specialist | Office of Civil Rights
Montana Department of Transportation
2701 Prospect Avenue
P.O. Box 201001
Helena, MT 59620
406-444-5416

mmaze@mt.gov



MEETING AGENDA

MDT Stakeholder Meeting – October 28, 2021

MEETING GOALS

The purpose of this meeting will be to present an overview of the draft update to the Montana Department of Transportation (MDT) ADA Transition Plan and provide an opportunity for stakeholder questions and comments.

MEETING DETAILS

Date: Thursday, October 28, 2021

Time: 2:00 PM – 3:00 PM

Registration Link: <https://mt-gov.zoom.us/meeting/register/tZAtdOusrD8sHdO-MBX-3ZVkpYh2Glb3LVHC>

AGENDA ITEMS

- 1) **Welcome and Introductions**
- 2) **Transition Plan Overview**
- 3) **Key Findings, Recommendations, and Progress**
- 4) **Updated Scoring Process**
- 5) **Feedback Opportunities**

To view the Draft MDT ADA Transition Plan, please visit the website at <https://www.mdt.mt.gov/pubinvolve/ada/>

Please submit comments on the plan by November 5, 2021.

For alternative accommodations, please contact Matt Maze, Office of Civil Rights, P.O. Box 201001, Helena, Montana 59620; telephone (406) 444-5416; Montana Relay 711; facsimile (406) 444-7243; or e-mail to mmaze@mt.gov.

ADA TRANSITION PLAN UPDATE

Montana Department of Transportation



APPENDIX B4:

Public Comments

Appendix B4-a: Public Comments Outside Review

Appendix B4-b: Public Comments During Review

ADA TRANSITION PLAN UPDATE

Montana Department of Transportation



APPENDIX B4-a:

Public Comments Outside Review

#	Submitted By Date	Comment
1	Shyla Patera 03/23/2021	<p>My name is Shyla Patera. I am employed by and represent North Central Independent Living Services, inc. I am also chair of my Transportation Advisory Council. As a longtime transportation advocate, I am excited to comment on the ADA Transition Plan. Montana's disability community well benefit from the writing of and the stakeholder involvement of Montana citizens with disabilities. One of the things that I believe that should be looked at in this plan is how we maintain our infrastructure and connectivity to our neighborhoods. I know this is local issue but when we measure community connectivity and our president infrastructure we as a state and as communities know where priorities lie.</p> <p>We should also be concerned about traffic counts and accessibility in our communities and on our roads. Often times pedestrians do not even get to finish crossing roads before lights change. Cars are often turning right behind Pedestrian and mobility devices. Another issue regarding community connectivity involves sidewalks, accessible pathways, and complete streets.</p> <p>With all of the new and proposed infrastructure in the field of transportation which will be impacting Montana, I would propose that we also study how rail infrastructure, airline infrastructure and intracity as well intercity city bus operations can be best connected so so that all mountains with disabilities have not only community connectivity but enter and intra-State connectivity. Also, we need to ensure that all communities have access to a disability accessible vehicle in all FTA and PSC activities.</p> <p>I would hope that MDT would engage stakeholders with disabilities throughout Montana. I would like to be added as an interested party for this ADA transportation plan.</p>
2	Shyla Patera 05/10/2021	<p>Hi Matt: This is Shyla Patera. I wanted to add the following topics to my comments at the stakeholder meeting today.</p> <p>I am hopeful that MDT can discuss pedestrian crossings and highways shoulder width. On restroom areas, I believe that we need to discuss accessibility parking pathways, and turning radii. I believe we also need to discuss accessible wayfinding and signage as well. We need to focus on connectivity and accessibility in our public transit systems as well.</p> <p>I would also hope that we can discuss E bikes accessible trails as well as autonomous vehicle structure and opportunities. We need to ensure that if we adopt autonomous vehicle standards that we include accessibility and update our entrance and exit opportunities as well as our PASS training and driving opportunities for those with visual or cognitive disabilities if allowed under AV standards. However, given the fact that our current infrastructure is often in need of upgrades as well. I'm hoping MDT and The State of Montana will consider adopting new accessibility standards in communities infrastructure if autonomous and electric vehicle standards are implemented in Montana.</p>
3	Dan Stone (Missoula Urban Transportation District) 05/19/2021	<p>Missoula Urban Transportation has a few comments regarding bus stop ADA issues that are applicable to MDT's ADA Transition Plan:</p> <p>We are currently in the middle of a system-wide bus stop improvement project which in some cases, involves relocating bus stops along MDT routes to better serve the public, and it is our view that moving the location of a bus stop does not constitute an alteration to the roadway that requires remedying existing ADA deficiencies in the sidewalk network.</p> <p>MUTD is aggressive in its work to improve ADA access at its bus stops, via its Bus Stop Master Plan, and regularly undertakes construction projects that add passenger amenities and provide new ADA access.</p> <p>However, in some instances MUTD bus stops need to be moved to improve service to transit riders. In these instances, the only physical change required is moving a sign. It is beyond the scope of these changes to also require an expanded concrete boarding/alighting area, regraded sidewalk, and/or connection to nearby existing sidewalk. The net effect is that these changes will not be made, and the bus stops will remain in sub-optimal locations.</p>

ADA TRANSITION PLAN UPDATE

Montana Department of Transportation



APPENDIX B4-b:

Public Comments During Review

#	Submitted By Date	Comment
1	Shyla Patera 11/03/2021	<p>My name is Shyla Patera. I am an Independent Living Specialist who represents North Central Independent Living Services, Inc.(NCILS) in Black Eagle, Montana. As a long time transportation advocate, I am really excited to submit comments on this ADA transition plan. NCILS hopes that MDT will help communities develop ADA Transition Plans and accessibility options in small urban areas ,rural ,and frontier communities! ADA transition plans and goals assist communities to evaluate accessibility and functionality of community infrastructure needs.</p> <p>In the area of public transit, NCILS believes that we need to focus upon intercity accessibility, connectivity, and affordability . Because this MDT ADA transition plan focuses on the external ADA issues in Montana, public transit needs to ensure that shelters, public pick up and drop off locations such as corners should be mobility accessible and free from barriers and protruding objects which often impede access to transit stops and buses or vans, sidewalks, crosswalks, and traffic signals.</p> <p>On intercity bus options, Montana needs to ensure that not only bus stations and community stops are available for Montanans with disabilities that need to use Greyhound, Jefferson Lines, and Salt Lake Express. The State of Montana needs to ensure that intercity bus lifts and mobility devices are accessible to one another and available on Montana trips. Montanans also know that Montana is often a go through state in interstate bus travel and national route planning. This issue can often cause unintended consequences for those who need to make connections where information may or may not be in accessible formats. Time of arrival and departure may cause some with mobility issues to struggle to make connections into communities or towns due to the arrival of bus networks. As a stakeholder in transportation and transit advocacy, I and NCILS do appreciate the scoring process to gauge how ADA compliant our statewide infrastructure is and should be.</p> <p>On sidewalks , NCILS believes that we need community accessibility standards which emphasize contiguous sidewalks and ADA curb ramps. NCILS believes that on all MDT and urban roads we need to ensure that traffic signals, crosswalks, and ADA curb cuts are not only accessible but functionally usable by all pedestrians and mobility device https://urldefense.com/v3/_http://users.in_!!GaaboA!-V55tB0u1uRW0zFteTVR4d_yQwd226khJJQ7s1sptMUjuLZ4rlqjwm1a_u61mA\$ small urban areas or frontier areas, often times mobility device users and pedestrians have to utilize the street as our primary mode of transportation because curb cuts are often incomplete on all four corners. On major highways and urban routes ,MDT must ensure that way finding , snow removal ,highway shoulders, as well as structures which maximize mobility accessibility.</p> <p>MDT needs to collect data on pedestrian and mobility device accidents and usage in small urban and rural areas regarding MDT facilities .It is hoped that all MDT plans will gather data on pedestrian and mobility device crashes and injuries in Montana.</p> <p>NCILS hopes that partnerships between state agencies can maximize accessibility in our natural environment, as many Montanans including those with disabilities ,utilize our trail systems.</p> <p>Regarding automated vehicles and microtransit, NCILS hopes that MDT studies the both the accessibility of automated driving and the accessibility systems and needs of vehicles . The United States Access Board has studied autonomous vehicles and systems and various needs for those with disabilities . NCILS hopes that the Access Board guidance will provide needed benchmarks moving forward as the State of Montana promotes and passes policies regarding autonomous vehicles.</p> <p>Thank you for allowing me to submit these comments regarding the MDT ADA transition plan.</p>

ADA TRANSITION PLAN UPDATE

Montana Department of Transportation



APPENDIX C:

Inventory Status Report

TOTAL BUILDING FACILITIES	379
Facilities <u>Not</u> Inventoried	120
Facilities <u>Inventoried</u>	251
<i>MDT Office Facilities</i>	<i>14 of 15</i>
<i>Safety Rest Areas</i>	<i>62 of 68</i>
<i>Parking Areas</i>	<i>2 of 14</i>
<i>State Owned Airports</i>	<i>3 of 3</i>
<i>Maintenance Houses</i>	<i>143 of 143</i>
<i>MCS: Non-Staffed</i>	<i>4 of 104</i>
<i>MCS: Staffed</i>	<i>23 of 24</i>
Percent Complete	67.7%

TOTAL INTERSECTIONS	13,792
Intersections <u>Without</u> Pedestrian Facilities	10,264
Intersections <u>With</u> Pedestrian Facilities	3,528
<i>Intersections <u>Inventoried</u></i>	<i>3,481</i>
<i>Intersections <u>Not</u> Inventoried</i>	<i>47</i>
Percent Complete	99.7%
Total Ramps Inventoried	15,246

Note: Inventory status as of September 2021 is shown.

ADA TRANSITION PLAN UPDATE

Montana Department of Transportation



APPENDIX D:

Scoring Report

APPENDIX D1: Scoring Report

ADA TRANSITION PLAN UPDATE

Montana Department of Transportation



APPENDIX D1:

Scoring Report

Appendix D1-a: Curb Ramp Score Report by Boundary

CURB RAMP SCORING PROCESS

MDT uses a composite system to score its right-of-way infrastructure. Points are assigned based on ADA demand and ADA compliance as described below.

DEMAND SCORES

Demand scores determine the likelihood of a pedestrian using a particular facility. The scores are calculated using the spatial data for structure and address points obtained from the Montana Structures Framework. This spatial data is used to create a heat map to show where higher density developments are located. Demand scores range from 1 to 10 with higher scores assigned to ramps in high density areas where pedestrian demand is likely to be higher, and lower scores assigned to ramps in areas with lower development densities. The structure types (i.e., demand generators) used in calculating the demand scores are listed in **Table 1**. An example of the demand heat map is shown in **Figure 1**.

Table 1: Demand Score Structure Types

Group	Description	Group	Description
Government	Government or Military Facility (Generic)	Public Places	Health or Medical Facility (Generic)
	Court House		Hospital / Medical Center
	Correctional Facility		Outpatient Clinic
	Military Facility		Nursing Home / Long Term Care
	State Capitol		Rehabilitation Center
	Local Government Facility		Day Care Facility
	State Government Facility		Public Health Office
	Federal Government Facility		Pharmacy
	Tribal Government Facility		Emergency Shelter
	City / Town Hall		Education Facility (Generic)
	Mail or Shipping Facility (Generic)		School (K-12)
	Post Office		College / University Facility
	Private		Commercial or Retail Site (Generic)
Hotel / Motel			Park / Recreation Area
Gas Station			Museum
Grocery Store			Library
Shopping Mall / Center			Church / Place of Worship
Banking or Finance Facility			Sports Facility
Office Building			Civic / Community Center
Restaurant / Bar			Fairgrounds
Transportation	Transportation Facility (Generic)		
	Airport		
	Heliport		
	Parking Site		
	Rest Stop / Roadside Park		
	Border Crossing / Port of Entry		
	Railroad Facility		
	Harbor Facility		
Bus Station / Dispatch Facility			

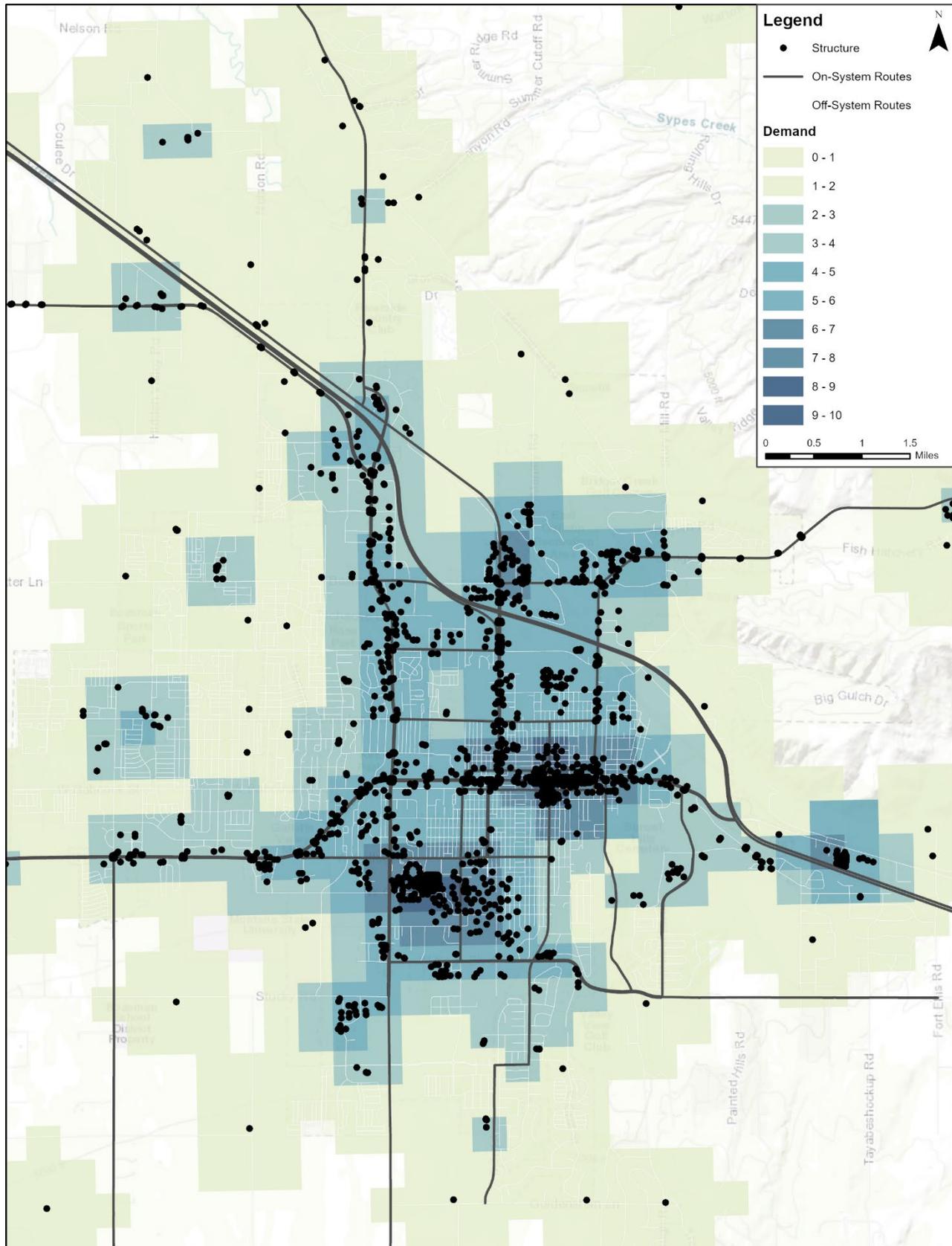


Figure 1: Example Demand Heat Map (Bozeman)

COMPLIANCE SCORES

Compliance scores assess whether curb ramps have been constructed to ADA standards. Compliance is evaluated based on 15 individual curb ramp elements. To provide an easy comparison, each ramp receives a score of 0 to 10 indicating the degree of compliance. Lower scores indicate features with greater compliance while higher scores indicate features with a higher number of non-compliant elements. A score of 10 is assigned to any location where a curb ramp is warranted but does not exist and a score of 0 is assigned to a fully compliant ramp. Each score is determined based on the number of scored elements for each individual ramp. Fields left empty generally are not considered in the compliance score, except if all element fields are empty the ramp automatically receives a compliance score of 10. **Equation 1** summarizes the compliance calculation and **Table 2** presents the elements considered in the compliance score.

$$\text{Equation 1: Compliance} = \frac{\sum \text{Applicable Element Scores}}{\# \text{ of Applicable Elements}} * 10$$

Table 2: Compliance Score

#	Element	Standard	Element Score
1	Trip Hazard / Flush with Surface	Empty (Null)	Null
		0 – None (Flush)	0
		1 – 0.25" or less	0
		2 – 0.25" to 0.50"	1
		3 – 0.50" or greater	1
2	Ramp Slope	Empty (Null)	Null
		≤ 8.3%	0
		> 8.3%	1
3	Ramp Cross Slope	Empty (Null)	Null
		≤ 2.0%	0
		> 2.0%	1
4	Ramp Width	Empty (Null)	Null
		≥ 48"	0
		< 48"	1
5	Landing Length	Empty (Null)	Null
		≥ 48"	0
		< 48"	1
6	Landing Width	Empty (Null)	Null
		≥ 48"	0
		< 48"	1
7	Landing Slope	Empty (Null)	Null
		≤ 2.0%	0
		> 2.0%	1

#	Element	Standard	Element Score
9	Flare Slope Left	Empty (Null)	Null
		≤ 10.0%	0
		> 10.0%	1
10	Flare Slope Right	Empty (Null)	Null
		≤ 10.0%	0
		> 10.0%	1
11	Gutter Slope	Empty (Null)	Null
		≤ 5.0%	0
		> 5.0%	1
12	Detectable Warning Device	Empty (Null)	1
		Yes	0
		No	1
13	Push Button Height	Empty (Null)	Null
		≥ 15" or ≤ 48"	0
		< 15" or > 48"	1
14	Push Button Clear Space (Length and Width)	Either Field is Empty (Null)	Null
		Greater than 48" x 30"	0
		Less than 48" x 30"	1
15	Push Button Slope	Empty (Null)	Null
		≤ 2.0%	0
		> 2.0%	1
Ramp is Undeveloped / Unconstructed OR All Fields (Except Ramp Layout) Empty			10

Note: Null indicates an individual element that does not contribute to the compliance score.

COMPOSITE SCORES

Composite scores help identify and categorize locations for barrier removal. MDT uses a composite scoring system calculated by multiplying the demand and compliance scores for each curb ramp. This methodology returns a minimum score of 0, indicating a fully compliant ramp (regardless of location or demand), and maximum score of 100, indicating an undeveloped but warranted ramp, or a fully non-compliant ramp in a location with high pedestrian demand.

AGGREGATE COMPOSITE SCORES

For comparison and reporting purposes, curb ramp composite scores are summarized according to four administrative boundary types: MDT districts, counties, urban areas, and communities. At the end of each year, MDT produces an annual update report summarizing completed actions and describing any changed conditions. Included in the report is an output of the scoring results to help MDT track progress in removing accessibility barriers and achieving ADA compliance. The scoring report, found at the end of this appendix, contains statistics summarizing the compliance, composite, and element scores for the curb ramps across the state summarized by the four administrative boundaries discussed previously.

The curb ramp scoring process is illustrated in **Figure 2** below. The possible ranges of demand, compliance, and composite scores are illustrated in **Figure 3**.

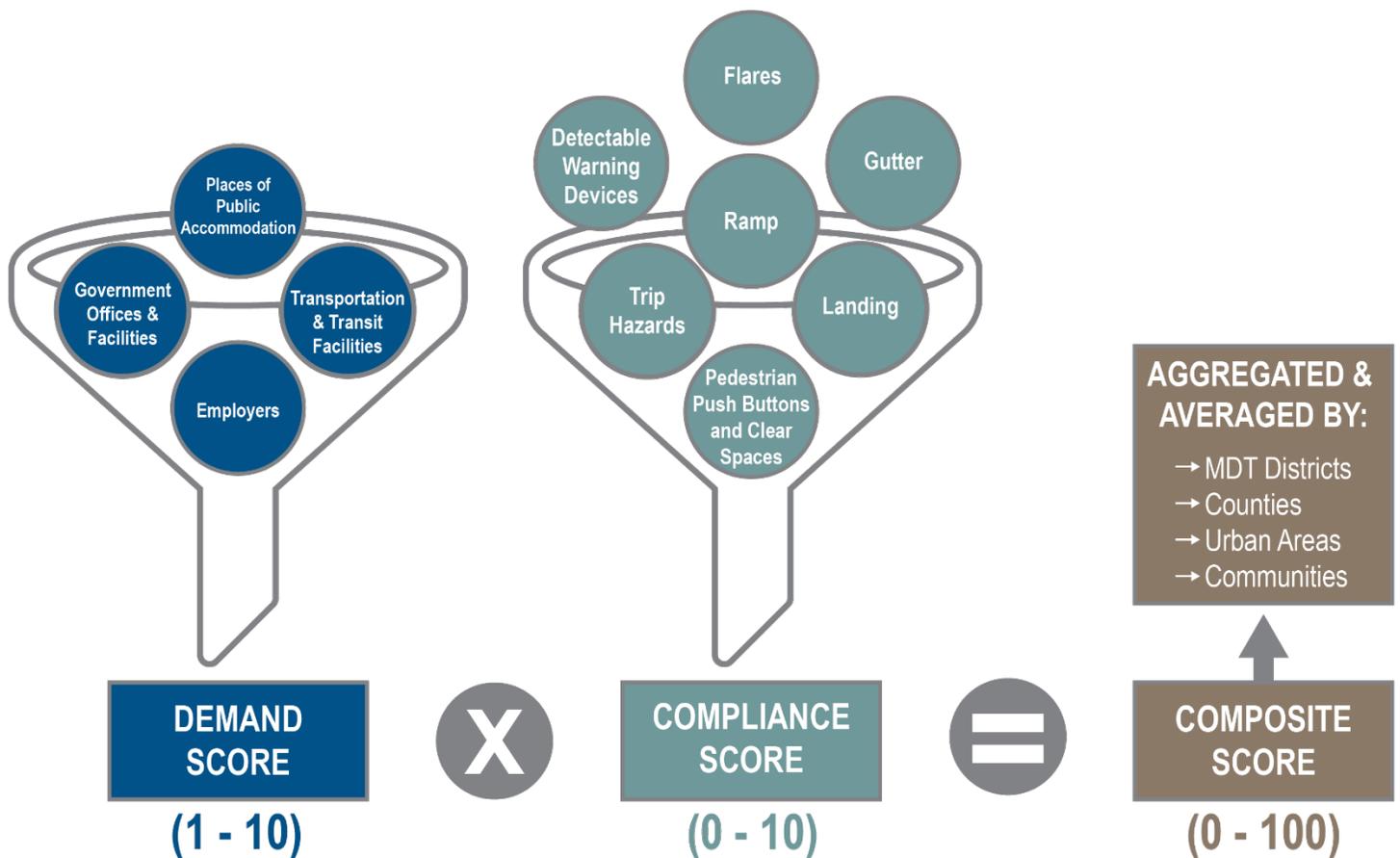


Figure 2: Curb Ramp Scoring Process

ADA CURB RAMP SCORING RANGES

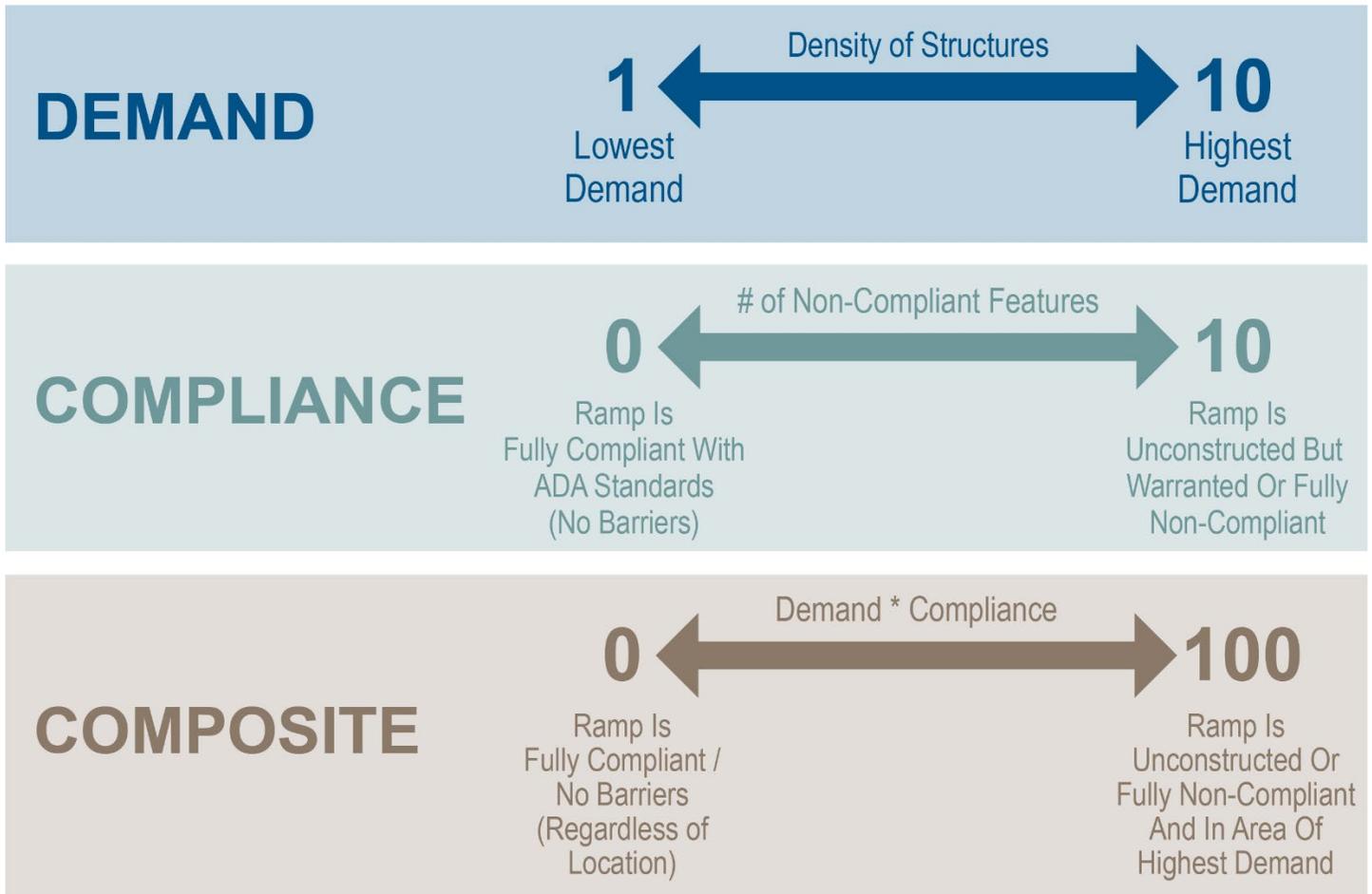


Figure 3: Possible Scoring Ranges

COMPOSITE SCORE VISUALIZATIONS

To help MDT make transportation investment decisions, the curb ramp composite scores are compiled to create heat maps showing where higher densities of non-compliant curb ramps and curb ramps with high composite scores are located. The outputs are overlaid with MDT’s Tentative Construction Projects (TCP) for the current five-year timeframe. This allows MDT to view hot spots of non-compliant curb ramps at or near project sites. This is intended to help MDT with the decision-making process during the project scoping phase.

In some situations involving improvements to existing infrastructure, it is infeasible to fully comply with ADA requirements within the scope limitations of the project. In these situations, compliance must be provided to the maximum extent feasible. Technical infeasibility is not factored into compliance scores. Instead, visualizations are applied to the data to help MDT identify locations where existing conditions have made a particular curb ramp technically infeasible.

Examples of these visualizations are displayed in **Figures 4 through 6**.

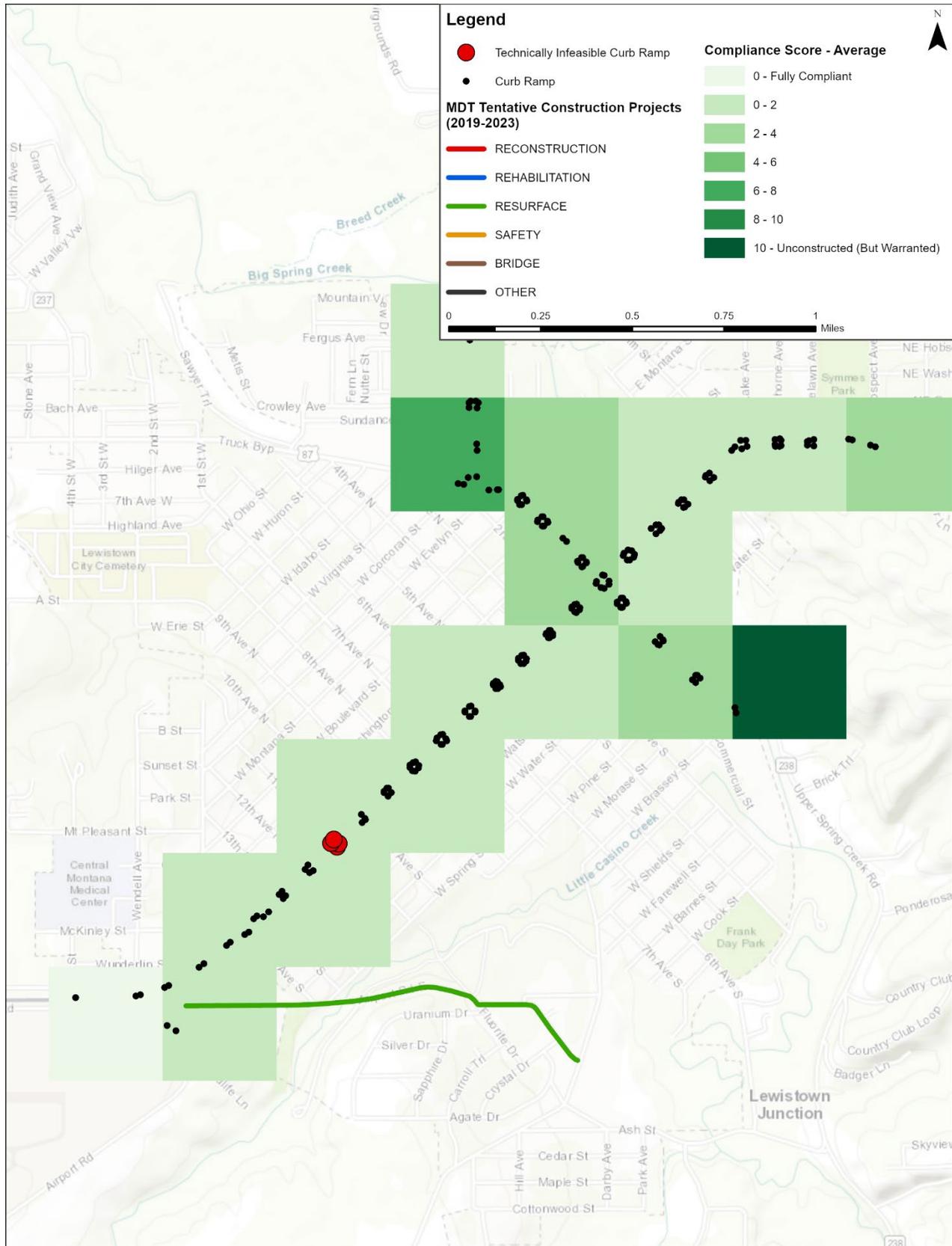


Figure 4: Example Compliance Score Average and Technical Infeasibility (Lewistown)

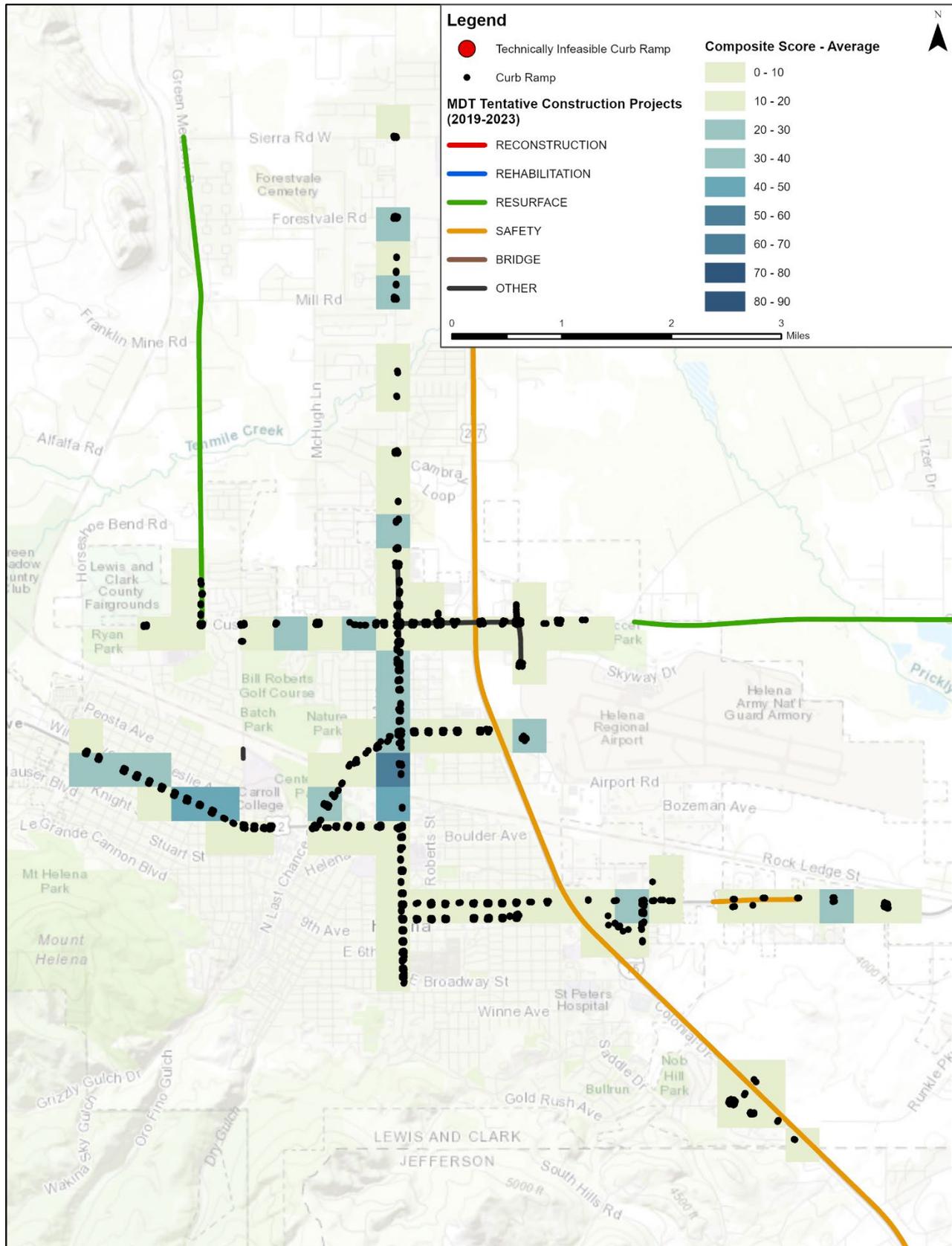


Figure 5: Example Composite Score Average (Helena)

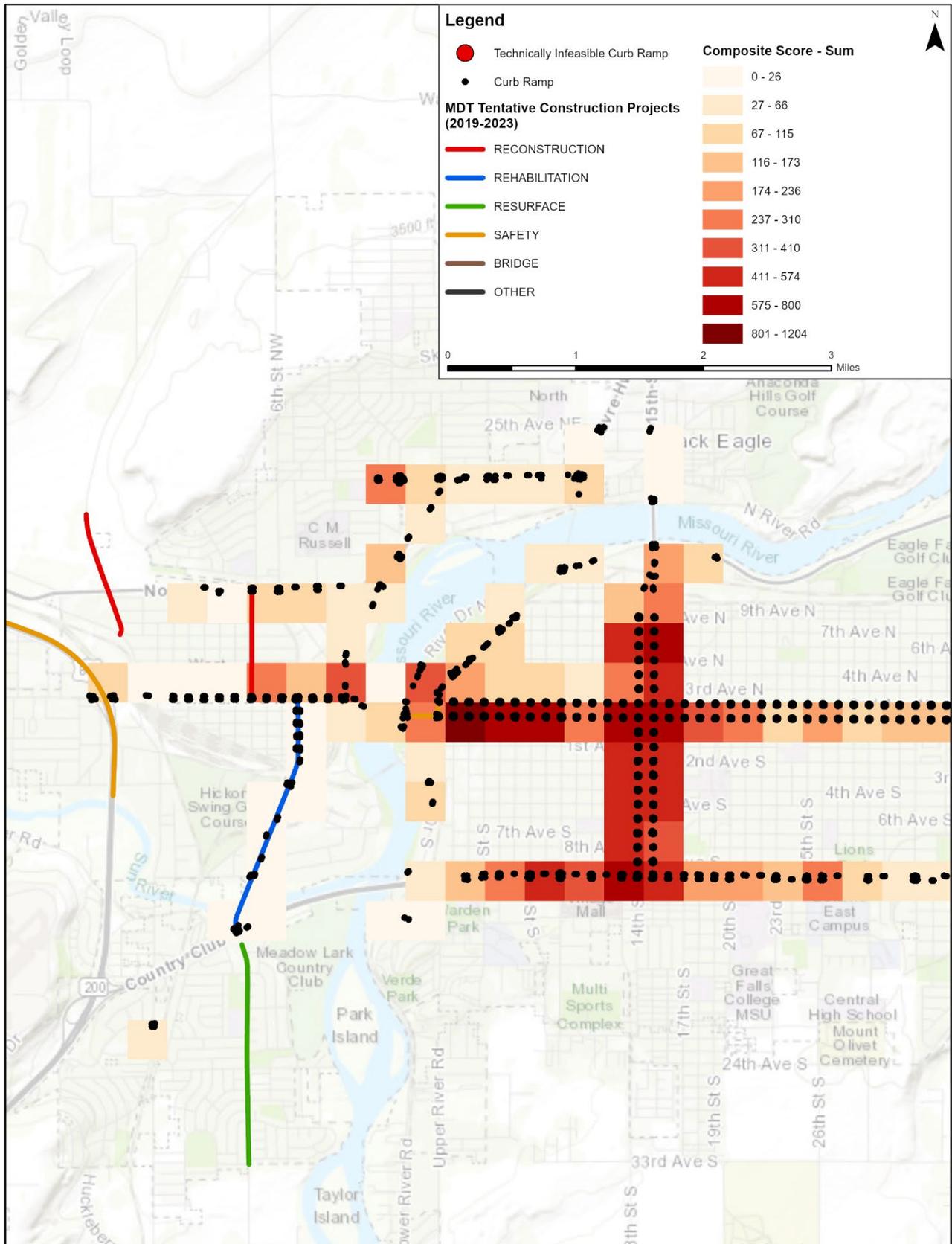


Figure 6: Example Composite Score Sum (Great Falls)

ADA TRANSITION PLAN UPDATE

Montana Department of Transportation



APPENDIX D1-a:

Curb Ramp Score Report by
Boundary

Curb Ramp Scores By MDT Administrative District (As of November 30, 2021)

MDT Administrative Districts	Number of Ramps	Average Compliance Score	Average Composite Score	Sum Composite Score
BILLINGS	2,365	5.05	19.36	37282.00
BUTTE	4,056	4.69	18.88	68472.00
GLENDIVE	1,609	6.13	23.39	38608.00
GREAT FALLS	2,704	4.67	18.32	37120.00
MISSOULA	4,512	4.82	23.75	67665.00
TOTAL	15,246	5.07	20.74	249147.00

**Scores for individual curb ramp elements are available upon request.*

Curb Ramp Scores By County (As of As of November 30, 2021)

County	Number of Ramps	Average Compliance Score	Average Composite Score	Sum Composite Score
BEAVERHEAD	182	6.74	24.13	3137.00
BIG HORN	195	3.97	19.53	3167.00
BLAINE	54	5.64	22.61	1607.00
BROADWATER	101	6.04	9.45	904.00
CARBON	257	4.85	19.61	3963.00
CASCADE	1,600	4.33	10.46	20872.00
CHOUTEAU	46	7.02	36.09	1425.00
CUSTER	248	3.32	27.07	8968.00
DANIELS	65	7.10	25.65	1424.00
DAWSON	106	7.59	33.79	3275.00
DEER LODGE	291	1.68	10.63	3093.00
FALLON	90	4.99	20.04	1826.00
FERGUS	307	4.15	19.21	5330.00
FLATHEAD	1,205	3.12	11.57	18923.00
GALLATIN	1,239	3.94	19.04	22681.00
GARFIELD	43	3.21	21.05	905.00
GLACIER	184	2.90	12.91	2343.00
GOLDEN VALLEY	43	3.43	17.36	820.00
GRANITE	74	9.05	52.10	3854.00
HILL	307	3.52	17.22	3367.00
JEFFERSON	214	3.10	12.00	2529.00
JUDITH BASIN	90	6.97	15.89	1449.00
LAKE	368	5.31	24.98	6710.00
LEWIS and CLARK	944	4.88	19.55	15707.00
LIBERTY	25	3.49	11.04	319.00
LINCOLN	275	4.48	23.84	5632.00
MADISON	168	4.97	26.91	4035.00
MCCONE	66	8.45	34.10	2257.00
MEAGHER	45	5.33	33.84	1523.00
MINERAL	79	6.21	32.57	2462.00
MISSOULA	1,870	2.70	9.44	19753.00
MUSSELSHELL	140	5.29	13.57	601.00
PARK	195	3.39	12.64	2373.00
PETROLEUM	24	8.12	35.57	778.00
PHILLIPS	88	6.31	15.26	1800.00
PONDERA	200	3.50	15.06	1867.00
POWDER RIVER	37	4.16	14.55	850.00
POWELL	123	5.87	17.18	2231.00
PRAIRIE	18	7.63	13.26	451.00
RAVALLI	547	4.46	17.86	7246.00

County	Number of Ramps	Average Compliance Score	Average Composite Score	Sum Composite Score
RICHLAND	247	6.08	15.50	3819.00
ROOSEVELT	232	6.30	25.56	5625.00
ROSEBUD	75	7.19	24.40	1881.00
SANDERS	94	5.93	36.96	3085.00
SHERIDAN	71	6.02	14.60	1282.00
SILVER BOW	590	7.09	21.66	11224.00
STILLWATER	124	5.80	25.76	3232.00
SWEET GRASS	92	1.24	7.02	646.00
TETON	153	5.67	28.70	3595.00
TOOLE	97	1.15	7.25	740.00
TREASURE	3	10.00	31.67	95.00
VALLEY	192	6.50	33.11	3728.00
WHEATLAND	109	4.38	16.27	1258.00
WIBAUX	33	3.39	15.67	517.00
YELLOWSTONE	981	4.49	19.84	15963.00
TOTAL	15,246	5.13	20.96	249147.00

**Scores for individual curb ramp elements are available upon request.*

Curb Ramp Scores By Urban Area (As of As of November 30, 2021)

Urban Area	Number of Ramps	Average Compliance Score	Average Composite Score	Sum Composite Score
Anaconda	291	1.68	10.63	3093.00
Belgrade	173	4.16	26.14	5274.00
Billings	890	2.61	13.42	14361.00
Bozeman	580	4.61	9.76	7160.00
Butte	587	5.64	20.49	11152.00
Columbia Falls	137	3.20	9.57	1857.00
Glendive	100	5.93	39.45	3076.00
Great Falls	1,455	2.60	10.56	19638.00
Hamilton	173	5.80	23.31	3449.00
Havre	286	2.90	12.60	2811.00
Helena	883	3.31	14.81	14079.00
Kalispell	710	4.04	16.25	12615.00
Laurel	83	3.61	14.19	1250.00
Lewistown	220	2.30	16.37	3679.00
Livingston	111	3.00	12.98	1500.00
Miles City	248	3.32	27.07	8968.00
Missoula	1,695	2.21	7.85	17546.00
Sidney	204	5.69	19.51	3263.00
Whitefish	192	2.84	13.68	2328.00
TOTAL	9,018	3.66	16.77	137099.00

**Scores for individual curb ramp elements are available upon request.*

Curb Ramp Scores By Community (As of November 30, 2021)

Community	Number of Ramps	Average Compliance Score	Average Composite Score	Sum Composite Score
Alberton	22	9.55	46.09	1014.00
Anaconda	291	1.68	10.63	3093.00
Bainville	16	9.54	28.06	449.00
Baker	75	4.33	20.41	1531.00
Bearcreek	12	9.33	17.17	206.00
Belgrade	146	4.37	32.46	4739.00
Belt	20	5.20	20.25	405.00
Big Sandy	6	7.00	44.67	268.00
Big Timber	92	1.24	7.02	646.00
Billings	840	2.28	16.48	13843.00
Boulder	82	3.09	16.20	1328.00
Bozeman	521	2.65	13.00	6775.00
Bridger	29	3.91	25.14	729.00
Broadus	32	5.52	26.09	835.00
Butte	572	2.87	18.92	10821.00
Cascade	65	1.27	5.31	345.00
Chester	23	3.30	13.09	301.00
Chinook	20	4.63	26.05	521.00
Choteau	108	3.36	21.81	2356.00
Circle	64	6.90	34.20	2189.00
Clyde Park	20	4.47	15.95	319.00
Colstrip	11	6.42	13.18	145.00
Columbia Falls	119	2.96	14.97	1782.00
Columbus	67	6.40	29.49	1976.00
Conrad	158	1.09	7.44	1176.00
Culbertson	72	4.81	20.11	1448.00
Cut Bank	94	1.02	4.93	463.00
Darby	25	3.55	16.36	409.00
Deer Lodge	109	3.49	18.42	2008.00
Denton	40	1.98	10.20	408.00
Dillon	128	3.42	16.75	2144.00
Dodson	11	2.42	6.64	73.00
Drummond	10	8.73	57.30	573.00
Dutton	18	6.48	36.94	665.00
East Helena	67	3.39	16.55	1109.00
Ennis	27	3.63	24.67	666.00
Eureka	30	5.20	37.17	1115.00
Fairfield	21	2.83	15.86	333.00
Fairview	42	2.97	13.00	546.00
Flaxville	8	10.00	30.63	245.00

Community	Number of Ramps	Average Compliance Score	Average Composite Score	Sum Composite Score
Forsyth	27	9.56	48.52	1310.00
Fort Benton	38	4.05	28.61	1087.00
Froid	16	8.88	32.94	527.00
Fromberg	5	6.27	33.60	168.00
Glasgow	136	1.32	10.43	1419.00
Glendive	94	4.76	29.57	2780.00
Great Falls	1,428	2.13	13.61	19435.00
Hamilton	150	2.87	18.71	2807.00
Hardin	122	1.60	11.81	1441.00
Harlem	26	9.03	41.77	1086.00
Harlowton	68	1.30	8.18	556.00
Havre	258	2.07	9.16	2362.00
Helena	700	2.55	16.67	11671.00
Hobson	25	5.04	21.80	545.00
Hot Springs	14	7.05	48.57	680.00
Hysham	3	10.00	31.67	95.00
Joliet	29	2.83	12.90	374.00
Jordan	43	3.21	21.05	905.00
Judith Gap	28	3.26	11.57	324.00
Kalispell	496	1.95	10.34	9928.00
Laurel	77	2.23	15.21	1171.00
Lavina	18	1.44	6.89	124.00
Lewistown	215	2.06	16.74	3599.00
Libby	134	2.33	16.05	2151.00
Lima	2	10.00	38.00	76.00
Livingston	106	2.40	13.57	1438.00
Lodge Grass	22	4.45	22.77	501.00
Malta	48	4.57	22.15	1063.00
Manhattan	74	1.75	9.39	695.00
Miles City	236	4.58	37.14	8764.00
Missoula	1,519	1.84	11.01	16720.00
Nashua	14	8.38	36.71	514.00
Neihart	31	10.00	9.10	282.00
Opheim	13	7.69	42.38	551.00
Philipsburg	58	8.40	51.67	2997.00
Plains	19	6.88	50.16	953.00
Plentywood	50	3.87	20.22	1011.00
Plevna	15	5.64	19.67	295.00
Polson	130	2.68	18.00	2340.00
Poplar	19	4.42	22.05	419.00
Red Lodge	139	1.92	12.96	1802.00
Richey	4	8.50	43.25	173.00

Community	Number of Ramps	Average Compliance Score	Average Composite Score	Sum Composite Score
Ronan	72	5.44	36.33	2616.00
Roundup	131	0.58	2.92	383.00
Ryegate	25	5.41	27.84	696.00
Saco	19	7.05	25.79	490.00
Scobey	57	4.20	20.68	1179.00
Shelby	83	1.05	7.78	646.00
Sheridan	37	1.06	6.16	228.00
Sidney	195	7.02	12.81	3039.00
Saint Ignatius	12	10.00	37.08	445.00
Stanford	59	2.84	13.76	812.00
Stevensville	46	3.23	17.83	820.00
Superior	36	3.83	24.28	874.00
Terry	17	5.25	26.53	451.00
Thompson Falls	38	3.18	21.47	816.00
Three Forks	87	4.49	29.10	2532.00
Townsend	97	2.09	8.91	864.00
Troy	41	3.90	20.17	827.00
Twin Bridges	39	4.89	29.79	1162.00
Valier	27	1.58	10.41	281.00
Virginia City	21	9.56	55.43	1164.00
West Yellowstone	64	2.56	20.08	1285.00
Westby	17	4.20	13.59	231.00
White Sulphur Springs	45	5.33	33.84	1523.00
Whitefish	186	2.13	12.02	2236.00
Whitehall	77	1.57	5.06	390.00
Wibaux	33	3.39	15.67	517.00
Winifred	24	4.17	21.88	525.00
Winnett	23	6.23	32.13	739.00
Wolf Point	59	5.38	30.08	1775.00
TOTAL	12,429	4.46	22.21	206682.00

**Scores for individual curb ramp elements are available upon request.*

ADA TRANSITION PLAN UPDATE

Montana Department of Transportation



APPENDIX E:

ADA Statement of Technical Infeasibility



Montana Department of Transportation ADA Statement of Technical Infeasibility

Send completed form
to MDT External ADA
Specialist

Route	Project	UPN
Intersection, Quadrant, & Coordinates		

Describe reason full compliance is infeasible:

- Structural** (Bridge beams, buildings, basements, foundations, vaults, etc.)
- Utilities** (Project scope would not otherwise require utility relocation and relocation is infeasible.)
- Steep Existing Grades**
- Right of Way** (Project scope would not otherwise require R/W or R/W is infeasible.)
- Other** (See attached.)

Attached Files:

	Yes	No	Curb Ramp Element(s)	Desired	Limits	Record Maximum Measured / Designed Value
A	<input type="radio"/>	<input type="radio"/>	Ramp Slope	5%	8.3% max	
B	<input type="radio"/>	<input type="radio"/>	Ramp Width	5 ft.	4 ft. min	
C	<input type="radio"/>	<input type="radio"/>	Ramp Cross Slope	1.5%	2% max	
D	<input type="radio"/>	<input type="radio"/>	Ramp Flares LT/RT	8.3%	10% max	
E	<input type="radio"/>	<input type="radio"/>	Landing Dimensions	5' x 5'	4' x 4' min (If not constrained)	
F	<input type="radio"/>	<input type="radio"/>	Landing Slope	1.5%	2% max (parallel and perpendicular to path of travel)	
G	<input type="radio"/>	<input type="radio"/>	Grade Break	Non-rounded & 90° to direction travel		
H	<input type="radio"/>	<input type="radio"/>	Detectable Warning	Required per standard		
I	<input type="radio"/>	<input type="radio"/>	Gutter Pan	5% max with flush transition		

Completed By Title Date

Approved By External ADA Specialist Title Date

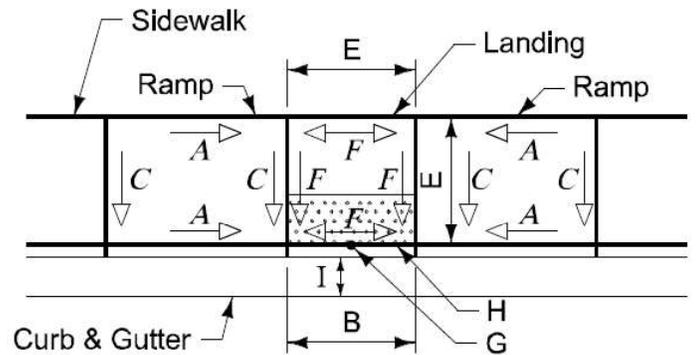
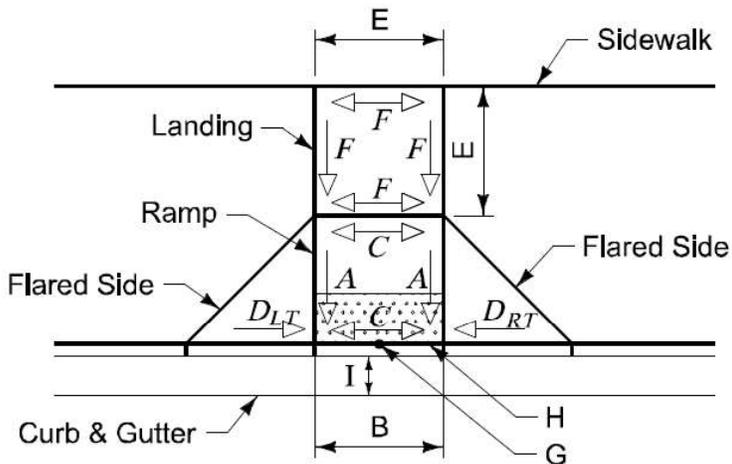
Disapproved By Title Date

Images

(Click blank area below to add image)



Description:



ADA TRANSITION PLAN UPDATE

Montana Department of Transportation



APPENDIX F:

Annual Action Plan

Pending Tentative Construction Plan (TCP) 2022-2026

ADA TRANSITION PLAN UPDATE

Montana Department of Transportation



APPENDIX G:

Progress Summary

PROGRESS SUMMARY

Since the 2016 *ADA Transition Plan* was completed, MDT has continued to upgrade its existing infrastructure and remove barriers to accessibility. Over the past five years, each of the five MDT districts have received two rounds of funding for stand-alone ADA upgrade projects. Stand-alone projects are projects that are focused exclusively on ADA upgrades and do not involve other highway improvements. This funding has enabled MDT to provide 1,546 ADA-compliant curb ramps and the equivalent of 7,200 feet of new sidewalk across 19 Montana communities.

MDT also continues to implement ADA upgrades as part of other programmed highway projects. Since 2015, MDT has installed an additional 1,465 ADA-compliant curb ramps, 435 accessible pedestrian signals, and the approximate equivalent of 212,300 feet of new sidewalk as part of other highway projects. These upgrades were implemented in 29 Montana communities across all five MDT districts.

Figure 1 shows the projects MDT has implemented across the state since 2015. Blue stars represent stand-alone ADA projects, and white stars represent larger highway projects with ADA upgrade components. Only projects that were constructed and completed from 2015 to 2021 are included in the figure. Projects under construction at the time of this update are not included.

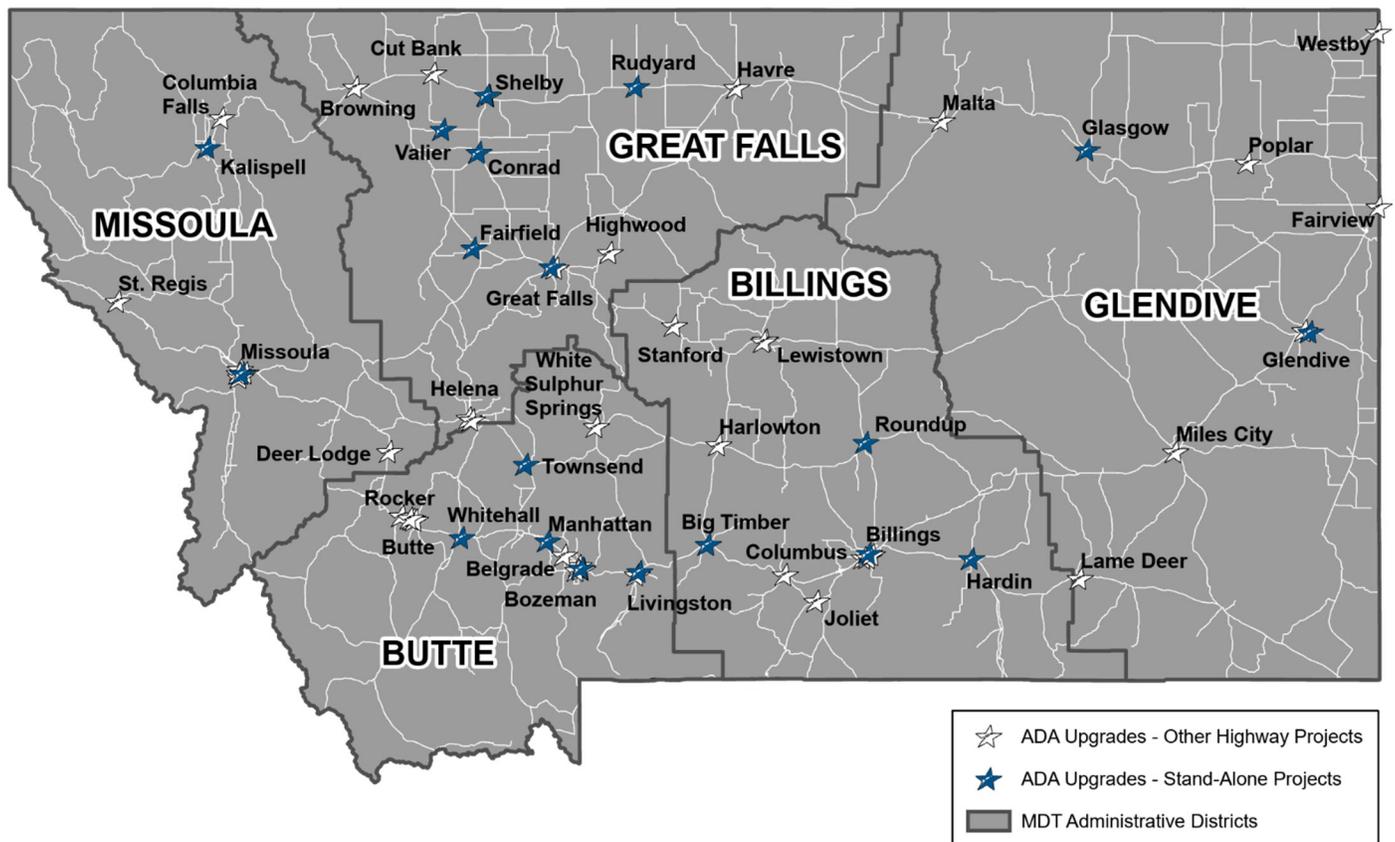


Figure 1: ADA Upgrades Constructed from 2015 to 2021

Figures 2 through 6 show the ADA upgrade projects broken down by each of MDT's five administrative districts. Callouts for each project summarize the total number of curb ramps, accessible pedestrian signals (APS), and approximate linear feet equivalents of sidewalk included in the projects. Approximate sidewalk lengths were calculated according to the square yardage included in project bids. To provide an approximated equivalent length, a standardized sidewalk width of 5 feet was assumed. Actual constructed lengths may vary.

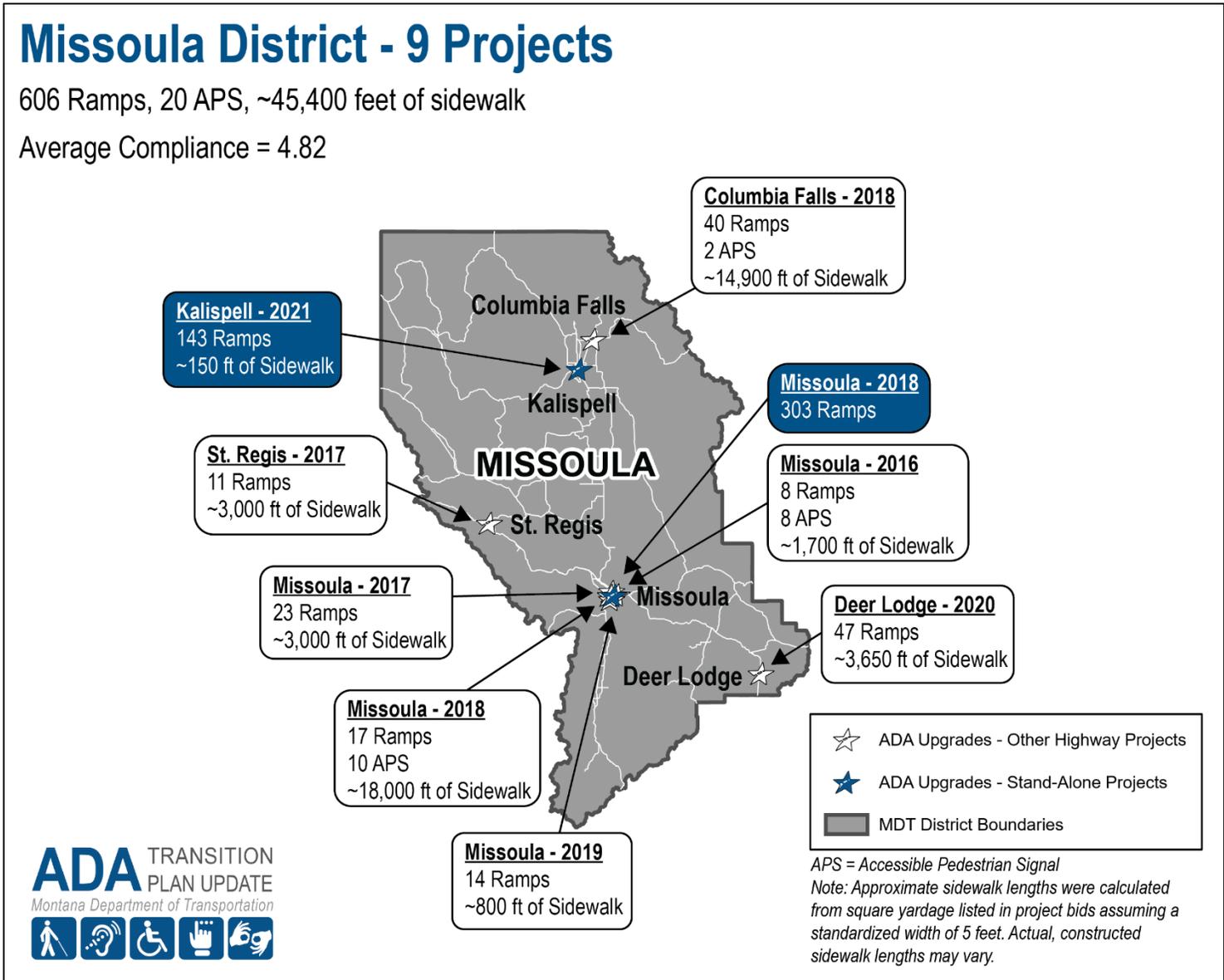


Figure 2: ADA Upgrades Completed in MDT District 1 (Missoula)

As shown in **Figure 2**, 9 projects were completed in the Missoula District from 2015 to 2021. With those projects, MDT successfully implemented 606 ramps, 20 APS, and approximately 45,400 feet of new sidewalk across 5 communities. As of November 2021, the average curb ramp compliance score in the Missoula District is 4.82.

Butte District - 12 Projects

551 Ramps, 94 APS, ~54,100 feet of sidewalk

Average Compliance = 4.69

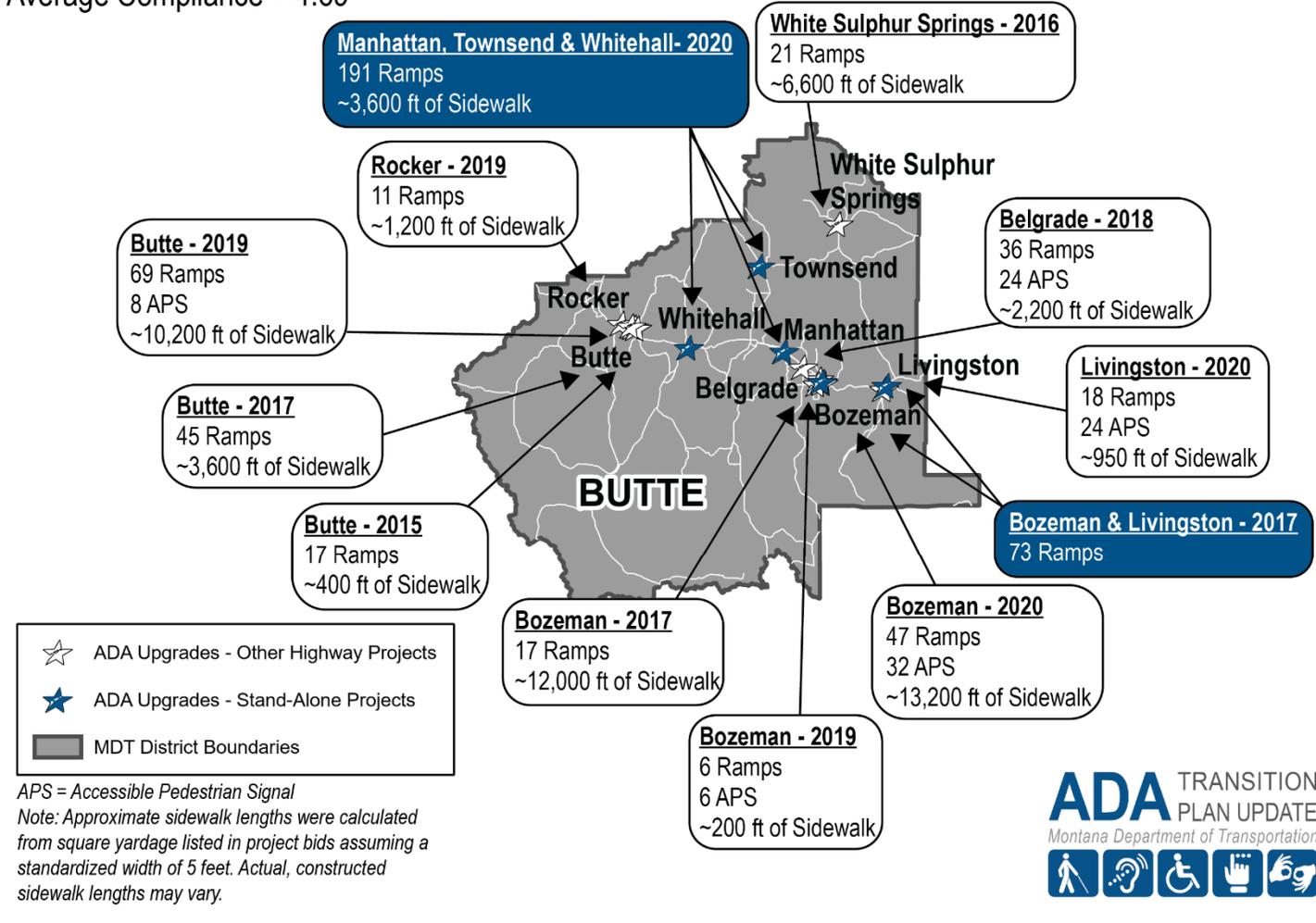


Figure 3: ADA Upgrades Completed in MDT District 2 (Butte)

Figure 3 represents the 12 projects completed in the Butte District over the past six years. Those projects resulted in 551 new curb ramps, 94 APS, and approximately 54,100 feet of new sidewalk across 9 Montana communities. As of November 2021, the average curb ramp compliance score in the Butte District is 4.69.

Great Falls District - 10 Projects

631 Ramps, 87 APS, ~37,900 feet of sidewalk

Average Compliance = 4.67

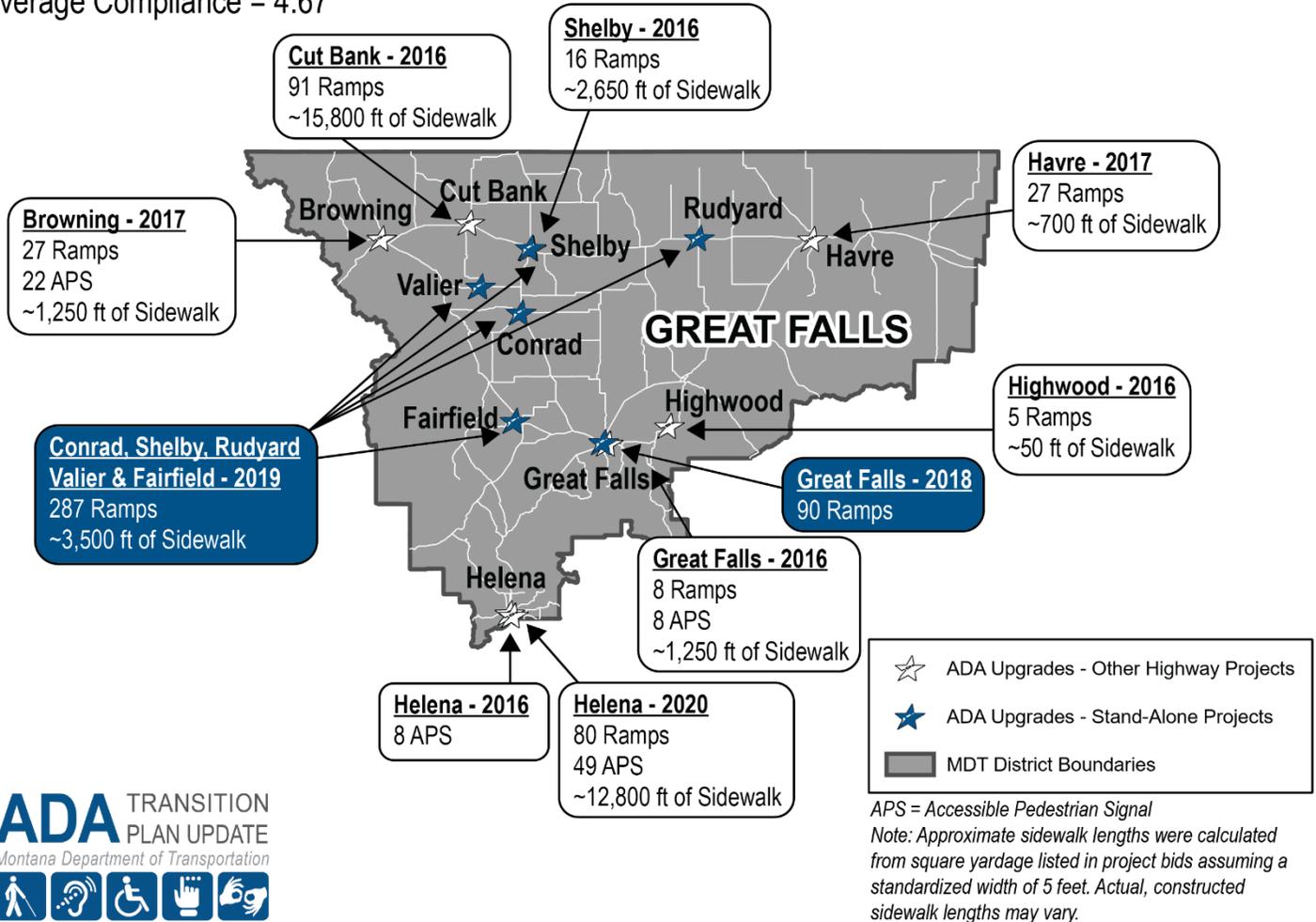


Figure 4: ADA Upgrades Completed in MDT District 3 (Great Falls)

As shown in **Figure 4**, 10 projects were completed in the Great Falls District from 2015 to 2021. With those projects, MDT successfully implemented 631 ramps, 87 APS, and approximately 37,900 feet of new sidewalk across 11 communities. As of November 2021, the average curb ramp compliance score in the Great Falls District is 4.67.

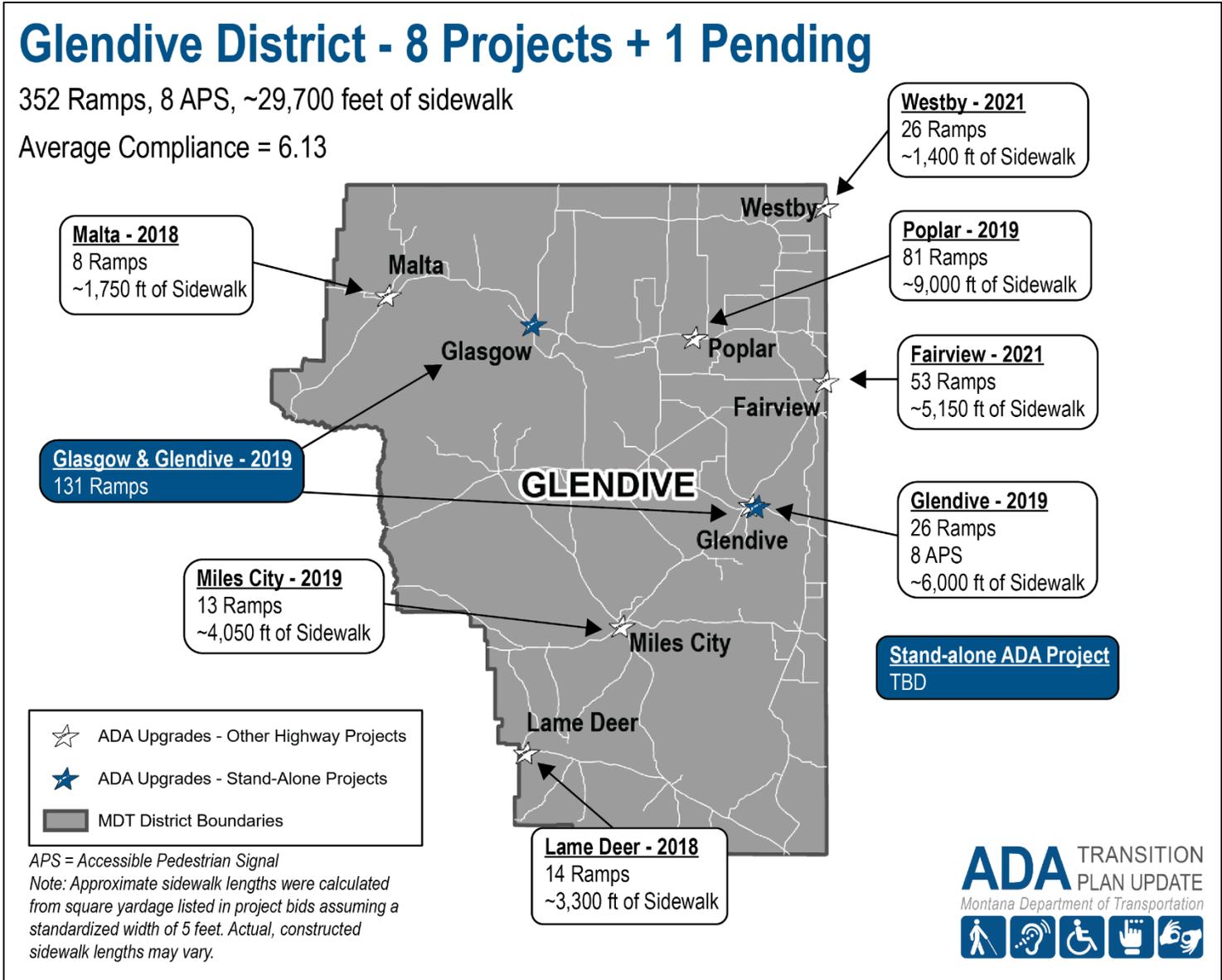


Figure 5: ADA Upgrades Completed in MDT District 4 (Glendive)

Figure 5 shows presents the 8 projects completed in the Glendive District over the past six years. An additional stand-alone ADA project has been funded but is not yet completed at the time of this update. The fully constructed projects have resulted in 352 new curb ramps, 8 APS, and approximately 29,700 feet of new sidewalk across 8 Montana communities. As of November 2021, the average curb ramp compliance score in the Glendive District is 6.13. The compliance score is expected to decrease with construction of the future stand-alone ADA project and updated inventory efforts reflecting recently completed projects within the Glendive District.

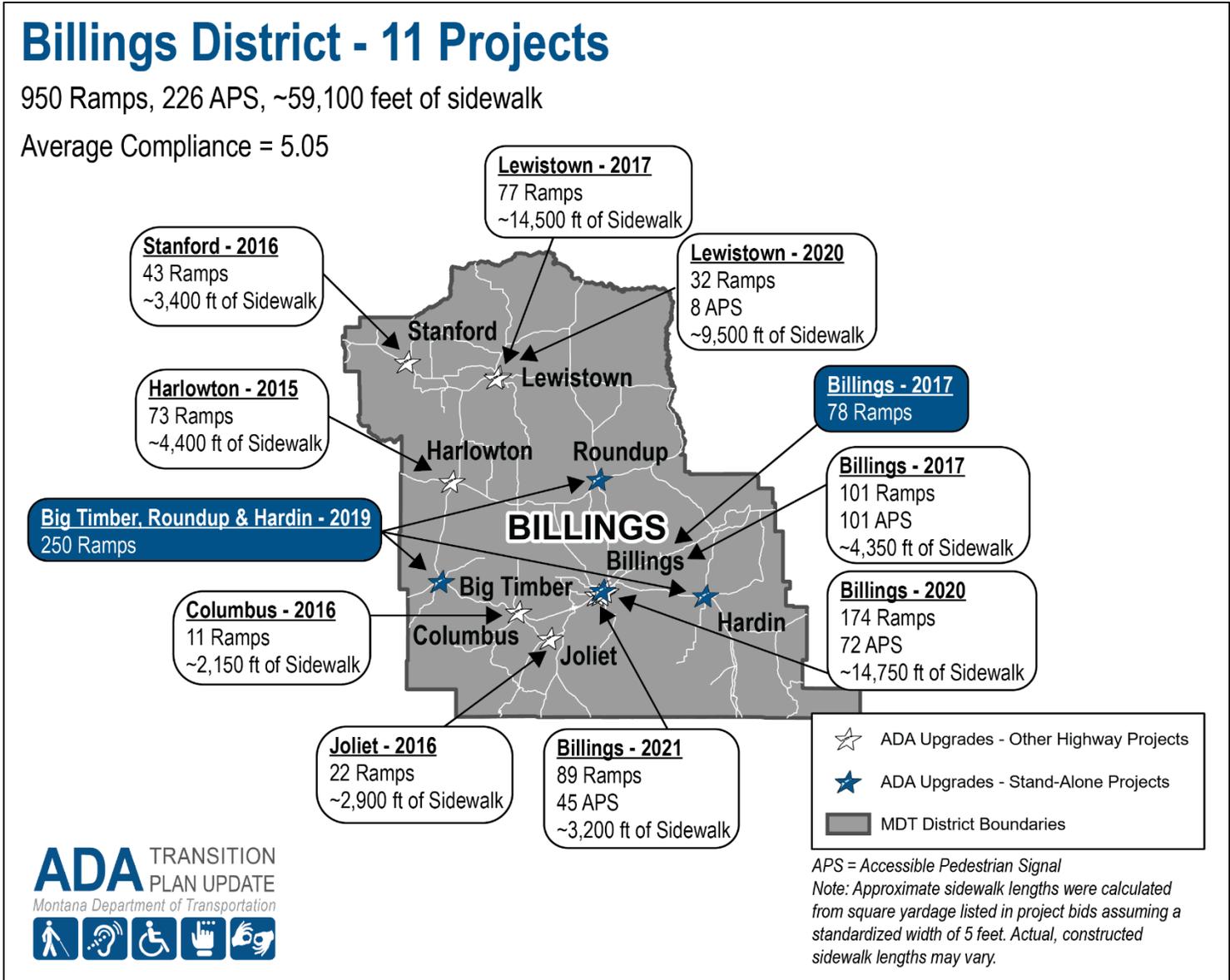


Figure 6: ADA Upgrades Completed in MDT District 5 (Billings)

As shown in **Figure 6**, 11 projects were completed in the Billings District from 2015 to 2021. With those projects, MDT successfully implemented 950 ramps, 226 APS, and approximately 59,100 feet of new sidewalk across 9 communities. As of November 2021, the average curb ramp compliance score in the Billings District is 5.05.