Idaho Transportation Department Americans with Disabilities Act Transition Plan

Please direct comments for this draft to Planning Services Manager, Ken Kanownik, AICP via email at ada@itd.idaho.gov or phone 208-332-7823

2021 Update
(Original Plan Submitted 2014)

YOUR *Safety*

YOUR *Mobility*

YOUR *Economic Opportunity*

Contents

Idaho Transportation Department Americans with Disabilities Act Compliance

Quick Reference

Updated January 2021

Implementing Regulation	Responsibilities	ITD Guidance Documents	Last Update	Responsible Division/Section	Responsible Staff
28 CFR 35.105	**Self-Evaluation** • 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.	Self Evaluation	12/1/2018	Office of Civil Rights	Russ Rivera
28 CFR 35.106	**Notice** • Make ADA information available to the public regarding applicability to ITD services, programs, and activities.	ITD Styles & Communications Guide	7/1/2011	Office of Communications	Mollie McCarty
28 CFR 35.107	**Responsible Employee/ Grievance Procedures** • 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.	ADA Transition Plan		Office of Civil Rights	Russ Rivera
28 CFR 35.130 **28 CFR 35.149**	**General Prohibitions Against Discrimination** • Do not exclude disabled persons from participation in or deny benefits of ITD services, programs, or activities. • Do not discriminate on the basis of disability.	Board Policy 4083 & Administrative Policy 5083	7/28/2016 10/13/2016	Office of Civil Rights	Russ Rivera
28 CFR 35.133	**Maintenance** • Maintain facilities and equipment required to be accessible to persons with disabilities in operable working condition.	ADA Transition Plan	Update In Progress	Highways Administration	Ken Kanownik Tony Pirc
28 CFR 35.150	**Existing Facilities** • 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.	ADA Transition Plan Highway Design Manual	Update In Progress 8/1/2013	Highways Administration	Ken Kanownik Tony Pirc
28 CFR 35.151	**New Construction and Alterations** • 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.	ADA Transition Plan Highway Design Manual	Update In Progress 8/1/2013	Highways Administration	Ken Kanownik Tony Pirc
28 CFR 35.160 **28 CFR 35.161**	**Communications/Telecommunications** • 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 ITD services, programs, and activities.	ITD Styles & Communication Guide ITD Guide to Public Involvement	7/1/2011	Office of Communications	Mollie McCarty
28 CFR 35.163	**Information and Signage** • 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.	Included in Self Evaluation	12/1/2018	Administration	Tony Pirc
28 CFR 35.190	**Designated Agencies** • ITD is a designated agency with the responsibility to implement	Included in Self Evaluation	Included in Next Update	Office of Civil Rights	Russ Rivera

Policy Statement and Context

The Idaho Transportation Department (ITD) recognizes that Idaho is one of the fastest growing states in the nation. This puts specific stresses on the transportation system due to growth, which is magnified due to a funding shortfall. Under these circumstances, ITD is still committed to providing the best possible transportation system to the citizens of Idaho.

In July of 2018, the Idaho Transportation Board update their Bicycle and Pedestrian Coordination Policy to include the following policy statement:

> "*The Idaho Transportation Board is committed to achieving a safe, effective and balanced multimodal transportation system that includes accommodations for bicyclists, pedestrians and pedestrians with disabilities where they are appropriate for the context and function of the transportation facility along with motorized modes of transportation*."

The updated ADA Transition Plan incorporates the Board's policy by making the commitment to eliminate barriers to accessible routes in the right-of-way of the State Highway System, provide an elevated level of coordination with local agencies and maintain that commitment through agency actions, training and outreach. ITD acknowledges that no single agency in Idaho can fully address the issue of accessibility in public rights of way. It is imperative that agencies collaborate in addressing accessibility, pursue innovative practices and use available funding in the most effective manner possible. This plan identifies program changes, strategies and opportunities to accelerate the transition to an accessible State Highway System.

Section 1 - Public Involvement

The department will perform the following activities to complete a public involvement component of this planning document:

- Stakeholder workshops
- MetroQuest interactive survey
- Draft Plan public comment period

All facets of the public involvement will be conducted without access barriers. A summary of the public involvement and how input was considered and incorporated by the department will be included in the adopted ADA Transition Plan.

Stakeholder Involvement:

ITD hosted two regional stakeholder workshops designed to collaborate, refine and guide a path forward for how ITD updates its ADA (Americans with Disabilities Act) Transition Plan for the State Highway System.

The first was hosted (virtually and in-person) on July 14, 2021, in Boise at ITD's District 3 office. ITD Planning Services Manager Ken Kanownik welcomed more than three dozen participants representing a wide spectrum of stakeholders. Representatives from local, city and state agencies, non-profits and other organizations including accessibility and disability advocates, planners, highway districts among others, attended.

During the open-dialogue presentation, participants provided feedback on proposed updates to the draft plan, a review of ITD's inventory on accessibility barriers and introduction to the draft interactive survey, and

what the general public involvement phase would look like during the plan update.

ITD Bicycle and Pedestrian Coordinator Margaret Havey hosted the same presentation (also with a virtual component) in Pocatello at ITD's District 5 office on July 21, 2021. Approximately two-dozen stakeholders (some of which attended the Boise presentation) participated, providing similar feedback, comments, and questions.

Feedback from both workshops ranged from local versus state responsibility for construction, maintenance and funding of ADA ramps, accessible sidewalks, and other items on the state highway system along urban and rural routes. Questions about compliance, how inventory is surveyed, and a greater understanding of how the Transition Plan can successfully meet its objectives and goals for end users, were also discussed.

The workshops provide vital feedback as part of the public involvement component of this plan update. A summary of the input and departmental responses are provided in Appendix B.

Section 2 - Delegation of Duties

The Idaho Transportation Department has delegated the following duties for the implementation of the ADA Transition Plan as follows:

Responsible Person for Implementing the Plan

Idaho Transportation Department
Division of Highways
Chief Engineer
ada@itd.idaho.gov
208-334-8231

Staff will split the specific areas of responsibility

Highways

Planning Services Manager
Division of Highways
208-332-7823

Facilities

Facilities Manager
Division of Administration
208-334-8600

Grievances and ADA Compliance

Civil Rights Program Manager
Division of Human Resources208-334-8884

Section 3 – Methodology
Funded Programs and Actions

ADA Transition Program Funding (formerly ADA Curb Ramp Program)

Since 2013, ITD has allocated $500,000 annually for local transportation agencies to upgrade curb ramps on the State Highway System to meet the requirements for accessible routes. Currently, this funding is programmed through fiscal year 2023 Beginning in FY2024, ITD will program an additional $500,000 to the ADA Transition Program making the annual commitment $1 million. ITD projects the ADA Transition Program will contribute $14 million total funding over the next 15 years. The program is currently state funded. ITD will fund the $500,000 increase with the following options (Which could strategically change from year to year):

1. Future increases to eligible federal funding
2. Future increases to eligible state funds
3. Future federal funding redistribution
4. Transfer from other eligible federal programs
5. Transfer from other eligible state programs

Beginning in fiscal year 2024, ITD will open eligibility of this program to include any barrier to an accessible route on the State Highway System. This include sidewalks, shared use paths, aprons, curb ramps and physical obstructions. Also beginning in FY 2024, ITD will select and manage the projects funded with this program (with participation from stakeholders and partner agencies). ITD will strategically select projects by reviewing the most recent Idaho Transportation Improvement Program (ITIP), identifying potential locations and coordinating with partner agencies locations that provide the most effective, economic and partnership opportunities. Funding will be prioritized to ITD's districts with the lowest percentage of compliance. ITD staff will include stakeholders and local agencies in the process for selecting locations.

Transportation Alternatives Program Funding

The department will modify its Transportation Alternatives Program Policy to include scoring criteria directed at removing accessible barriers and affirm that accessibility improvements are a statewide priority. This will allow local agencies to address barriers that also provide additional community benefits or projects that enhance communities with the removal of an accessible barrier as an additional benefit of the project. All applicants will be required to provide documentation of their local ADA Transition Plans if they are required* to have one. All applicants will also be required to verify the department's ADA Inventory provided through an online mapping application.

*An agency with 50 or more, full and part time employees combined, are require to have an ADA transition plan. ITD will provide a template ADA transition plan for any agency

to use. ITD will also provide accessibility expertise services to the Local Highway Technical Assistance Council to help rural jurisdictions across Idaho reach compliance.

Federal Transit Administration Funding

Certain Federal Transit Administration (FTA) programs allow the funding of bicycle and pedestrian infrastructure within the catchment areas of transit stops and station. Local matching funds are required at 20%, and pedestrian improvements must be within one-half a mile of a transit stop. This is an opportunity to leverage non-federal money to remove more barriers to access in areas that are served by public transit. As part of this plan, ITD will provide our ADA inventory and coordinate with local transit agencies to pursue FTA eligible funding for the removal of accessibility barriers.

Project Leveraging (Highway Altering Projects)

ITD currently includes upgrading curb ramps in highway altering (as defined in the DOJ/DOT Joint Technical Assistance, July 8, 2013) projects. Additionally ITD will include barriers to access that can be eliminated reasonably* as part of the project within the existing right-of-way. ITD is committed to removing barriers to accessible routes on the State Highway System; however, the department recognizes barriers may exist that cannot reasonably be removed with a specific highway-altering project. The department will document, using sound engineering principles, any barrier that cannot reasonably be removed with a highway-altering project and document the department's intended plan to remove such barriers. The department also recognizes that local projects and development may contribute to the removal of barriers. All exceptions to accessible barrier removal with a highway-altering project shall be documented in the project charter or with a memo in the project file. Exceptions 1, 2 and 3 may be approved by the District Engineer and exception 4 shall be approved by the Chief Engineer.

The following criteria may be applied as exceptions to inclusion in highway altering projects:

1. An agency has the improvements identified as a funded project in a local Capital Improvement Program or the ITIP;
2. ITD has coordinated with the applicable local land use agency and has identified the location as an area subject to redevelopment in the next 7 years. *This documentation must reference an active zoning case, site plan or direction from an economic development agency;*
3. The barrier is not federally required with the project and the applicable local agency agrees to remove the barrier. (An encouraged practice would be to revisit the state and local maintenance agreement and document the agency's commitment to removing the barrier).
4. The costs of a specific barrier exceeds 10% of the total cost of the project or is detrimental to the delivery of the project (*this may include the need to conduct*

public involvement or design an acceptable solution by a local agency, this does not exempt the barrier from compliance, but that the department cannot reasonably bring the barrier into compliance with the highway altering project and the department will seek an alternative solution).

*Guidance on Feasibility:

The phrase "to the maximum extent feasible'' as used in ADA guidance documents, applies to the occasional case where the nature of an existing facility makes it virtually impossible to comply fully with applicable accessibility standards through a planned alteration. In these circumstances, the alteration shall provide the maximum physical accessibility feasible. Any altered features of the facility that can be made accessible shall be made accessible.

The 10% threshold is not a requirement for technical infeasibility, but serves as guidance to staff of when to start evaluating technical infeasibility.

ADA Staff Training

ITD will implement and ADA Training policy that provides a basic understanding of ADA requirements and incremental and strategic training on the construction of accessible routes.

ITD's basic training will be a virtual module that provides all Division of Highways employees the basics of the Access Board, Americans with Disabilities Act, the understanding of various impairments, the mobility limitations from such impairments, the basics of accessible routes and how to identify barriers to accessible routes.

ITD will also pursue advanced training for Division of Highways, Design and Construction staff that are involved with the design and construction of accessible infrastructure.

ITD will report training efforts in progress reports of this transition plan. ITD will make ADA training available to partner agencies to assist in the implementation of Local ADA Transition Plans

Future Methodologies and Practices

ITD recognizes that this ADA Transition Plan addresses the most urgent barriers and provides guidance for an elevated commitment to improving access on the State Highway System. To quickly deliver this plan, more complicated issues will be deferred for future updates. Future methodologies and practices ITD will research, collaborate and consider for future ADA Transition Plan updates are (but not limited to):

- Best practices in areas of limited right-of-way and technically difficult solutions

- Local partnership cases studies
- Enhanced stakeholder and public involvement
- A review of maintenance activities and work zone accommodations

Other Areas of Emphasis

ITD recognizes that as barriers are eliminated and accessible networks expand in Idaho, ITD will have an elevated role in ensuring accessible routes remain accessible. As travelers increasingly rely on accessible routes for access to essential goods and services it becomes more important that those routes remain accessible through maintenance, future work zones and development. ITD will remain committed to maintaining accessibility by:

- Following Manual on Uniform Traffic Control Devices (MUTCD) standards on maintaining accessibility through work zones
- Continuously improving access for public involvement
- Including disabled citizens in various advisory roles to the Idaho Transportation Board

Prioritization

A summary of prioritization is as follows:

1. The ADA Transition Program funding will be prioritized (and rotate) by the district with the most barriers.
2. Each District will strategically select projects considering areas without funded projects in the ITIP, strategic locations that maximize cost benefit, the ability to partner with local agencies and coordination with stakeholders.
3. Local agencies can apply for funding through the Transportation Alternatives Program for local priorities.
4. Highway altering projects will be prioritized based on the individual program guidance, such as the Transportation Asset Management Plan for pavement restoration and reconstruction projects.
5. ITD will have little control over barriers removed through development or local agencies applying for FTA funding, however these will contribute over time to the elimination of access barriers.

Section 4 - Inventory of Highway Barriers

As part of this update ADA Transition Plan, ITD has developed a new inventory of barriers using LIDAR technology to inventory all curb ramp and sidewalk accessible barriers. The inventory of highway barriers will be publicly accessible and end users will be able to submit new barriers enhancing the inventory through "crowdsourcing". ITD will transition from a manually updated geodatabase of curb ramps to the LIDAR based inventory, which will be updated every three years through a complete analysis of the State Highway System. The current investment estimate to conduct an update of the data for the Inventory of Barriers is $750,000 on a three-year basis.

The following chart outlines the total numbers of locations for curb ramp and sidewalk barriers.

ITD ADA Highway Inventory Summary						
Type of Infrastructure	**2021**		**2024**		**2027**	
Curb Ramps	**Count**	**% of Total**	**Count**	**% of Total**	**Count**	**% of Total**
Compliant	**995**	**12%**				
Retro-Fit & Maintenance	**1,917**	**23%**				
Replace	**5,456**	**65%**				
Sidewalks	**Segments**					
Compliant	**4,275**	**71%**				
Retro-Fit Eligible	**1,452**	**24%**				
Replace	**315**	**5%**				
Driveway/Approach	**Count**					
ADA Compliance Analysis Pending	9683					
Other Reported Barriers	**Count**					
Retro-Fit Eligible	**TBD**					
Replace	**TBD**					

Infrastructure is categorized into three criteria:

Compliant: Fully ADA compliant infrastructure

Retro-Fit & Maintenance Eligible:

Infrastructure that has a practical retrofitting solution to bring into compliance

- Sidewalks include width between 48-59 inches that can become compliant with passing areas
- Compliant Curb ramp slopes with adjacent non-compliant items such as push buttons, vertical/horizontal barriers or maintenance issues

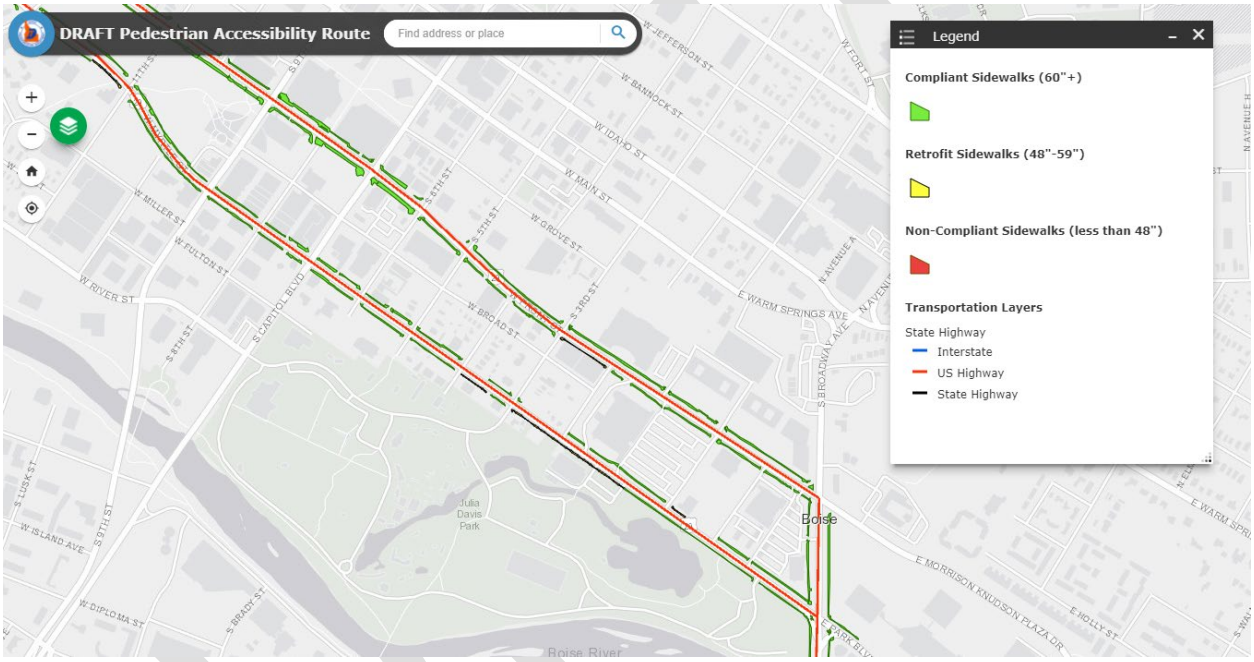
- Curb ramps that were constructed compliant that have an identified barrier that can be rectified through general highway maintenance activities. (example below)
- Other barriers that could become compliant without full replacement

Replace: Infrastructure that must be replaced to meet ADA compliance

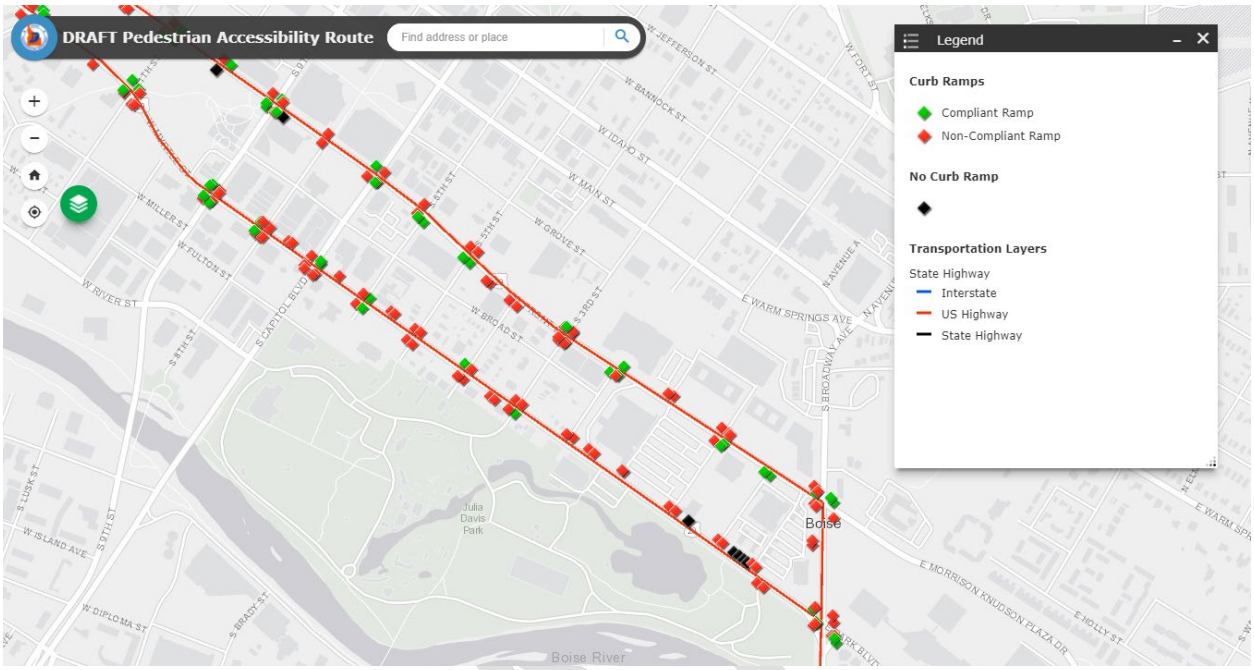
The physical location of each accessible barrier is maintained in a geodatabase available here:

ITD Pedestrian Accessibility Inventory

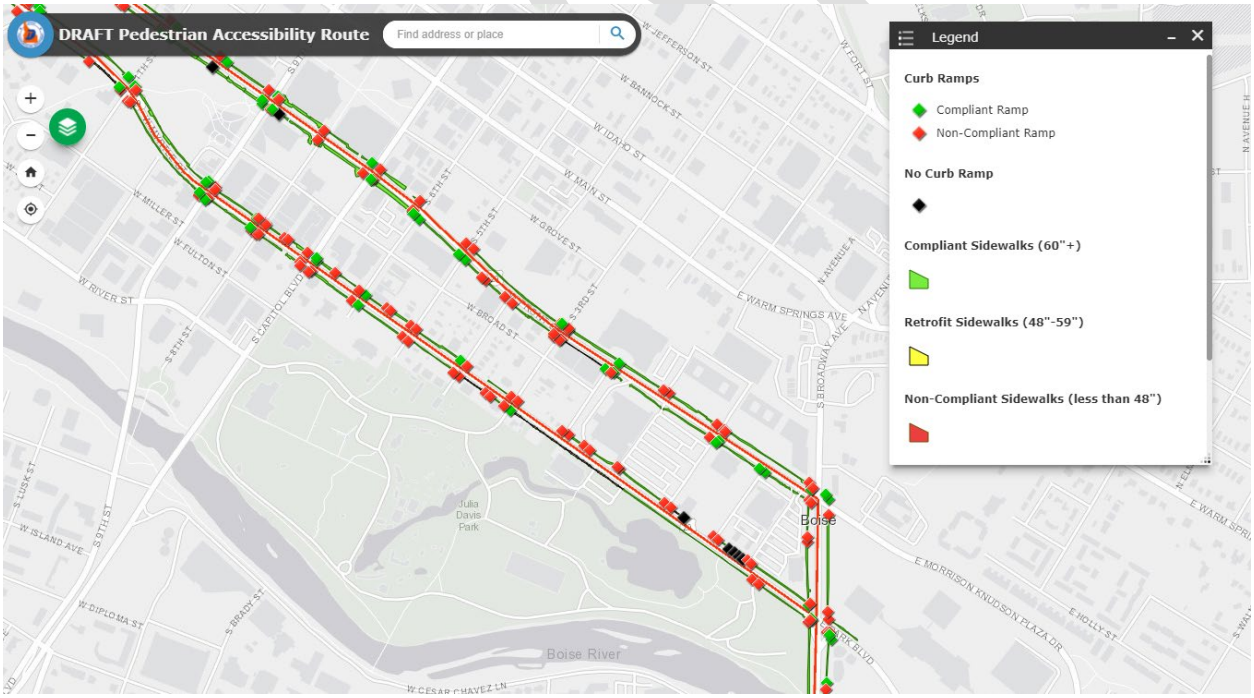
A display sample of the sidewalk layer:



Sample of the Curb Ramp Layer:



Sample of both layers combined:



Sample of a maintenance eligible curb ramp:

Debris can build up on detectable warning surface reducing effectiveness.

Section 5 - Schedule for Compliance

ITD will implement several innovative methods in addition to traditional methods in reaching an accessible transportation system. Appendix C – ADA Transition Plan Major Activities Timeline outlines the noteworthy activities that will take place through federal fiscal year 2024. Of note is the updating of the State Highway System inventory through LiDAR. This will allow ITD to update and provide a more accurate projection after reviewing three additional construction seasons, updates to ADA Transition and TAP programs and looking at the adopted ITIP in the spring of 2024.

Fifteen Year Outlook

At the proposed funding levels in this plan, it is expected that approximately $14 million in dedicated funding will be programmed to address ADA Transition on the State Highway System through the year 2036. ITD projects that contributions from highway altering projects will exceed $15 million through 2036. Additionally ITD projects that local grant awards, operational contributions, in-kind contributions and professional service contributions are valued at $7.5 million over 15 years. ITD expects a minimum of $35 million in investments towards an accessible State Highway System by 2036. The funding for this plan is summarized below:

Funding or Activity	Status	Amount
ADA Program Funding	Committed	$14,000,000
Highway Altering Projects	Projected	$15,000,000
Transportation Alternatives	Projected	$2,000,000
Development	Projected	$1,000,000
Projects by Others	Projected	$2,000,000
In-Kind and Services	Projected	$1,000,000
Total Commitment and Projected Funding		$35,000,000

When a vast majority of the barriers are eliminated, the department will reassess strategy to focus on:

- Alternatives for technically infeasible locations
- Context sensitive areas
- Maintain an accessible system through best practices and partnerships with local agencies

Two constraints lead to ITD selecting a fifteen-year outlook timeline. First, ITD expects to program some type of highway altering project in most urban areas during this time period (based on expected pavement lifecycles in Idaho). Secondly, the additional funds and contributions (ADA Transition Program, TAP, FTA, Development and local projects) will be targeted and coordinated in areas not programmed or forecasted to receive highway altering projects. This gives ITD a projection of a strong majority of the State Highway System compliant in fifteen years from the adoption of this plan.

Strategy Chart

The following chart summaries how the various accessible barriers are accounted for in the State Highway System inventory, where the methodologies address the various barriers and the coordination efforts the department will engage in to remove accessible barriers from the State Highway System.

ITD ADA Transition Plan Strategy Summary					
Barrier Type	**Inventory Geodatabase Layer**	**Primary Methodology**	**Secondary Methodology**	**Other Methodologies**	**Coordination Efforts**
Curb Ramps (includes some signal aspects)	Curb Ramps	ADA Transition Program	Transportation Alternatives	Highway Altering Projects; Development	Local ADA Transition Plan; FTA Funding
Driveway Approach	Driveways	ADA Transition Program	Transportation Alternatives	Highway Altering Projects; Development	Local ADA Transition Plan; FTA Funding
Sidewalks (including rail crossings)	Sidewalks	ADA Transition Program	Transportation Alternatives	Highway Altering Projects; Development	Local ADA Transition Plan; FTA Funding
Signals	Curb Ramps	ADA Transition Program	Transportation Alternatives	Highway Altering Projects; Development	Local ADA Transition Plan
Bus Stops	Sidewalks	ADA Transition Program	Transportation Alternatives	Highway Altering Projects; Development	Local ADA Transition Plan; FTA Funding
Public Buildings	Buildings (future product)	Facilities Program	Highways Projects (Ports of Entry)	-	Division of Highways and Division of Administration
Parking and Rest Areas	Buildings (future product	Facilities Program	Rest Area Program	-	Division of Highways and Division of Administration
Shared Use Paths	Sidewalks	ADA Transition Program	Transportation Alternatives	Highway Altering Projects; Development	Local ADA Transition Plan; FTA Funding
Other Vertical and Horizontal Barriers (includes crosswalks and some signal aspects)	Crowdsourcing	Local Maintenance Agreement Enforcement & ITD Highway Operations (barriers between curbs)	Highway Altering Projects	ADA Transition Program	Local ADA Transition Plan

Section 6 – Public Buildings

ITD has reviewed the ADA and have made the following observations regarding compliance with ADA for existing facilities. (28 CFR 35.151 (a)). Section 6 of this plan applies to public buildings defined as the buildings that have general entry to the public. Accessibility issues for employees are not part of this transition plan, but are addressed through the department's Facilities Program Plan.

If the construction of a building was commenced prior to January 26, 1992 there is no requirement that it be brought up to comply with ADA standards unless an alteration or addition is done.

Buildings that were constructed after the date above must comply to ADA. There is a table (to be inserted in the final plan) that lists the construction dates and which edition of the ADA standards must be complied with. (28 CFR 35.151 (c))

If an addition/alteration or new construction is started that work must comply with ADA. There are some exceptions if the cost to comply becomes disproportionate (over 20%) to the value of the addition/alteration or for historic structures.

Starting in FY22, ITD intends to hire various firms throughout the State to perform building Condition Assessments of the structures on the highway with public access. These will be performed by licensed Architects and Engineers. The firms will assess HVAC, electrical, plumbing, structural, and compliance with ADA standards to determine compliance with current code and determine if repairs are needed. Within these reports, the team will project costs to bring these buildings into compliance.

Once the assessment and estimates are obtained, ITD will begin including ADA improvement projects in the department's seven year Facility Program Plan

Upon receiving funding, ITD will competitively contract for work to bring all state highway buildings into compliance.
The final plan will include an appendix of the Facilities Program Plan

Section 7 – Requests for Accommodations

ITD's External ADA Grievance Procedure and requests for accommodation form are available by accessing the ITD home page at https://itd.idaho.gov, clicking the link 'Accessibility'. Public requests made through this procedure will be reviewed and the results of the requests will be communicated directly to the individual by phone or email.

The Idaho Transportation Department is committed to providing equal access to programs, services, and activities for persons with disabilities. The External ADA Grievance Procedure established in accordance with agency policy, state and federal law, is intended to be used by non-ITD employees who wish to file a complaint alleging discrimination on the basis of a disability in the provision of services by or access to activities, programs or facilities of the Idaho Transportation Department. Complaints may be filed by any person who believes that he or she has been excluded from participation in, been denied the benefits of, or otherwise subjected to discrimination under any Idaho Transportation Department (ITD) service, program or activity, and believes the discrimination is based upon disability. This external grievance procedure does not apply to complaints relating to employment by the Idaho Transportation Department which are addressed in a separate procedure.

All complaints should be submitted as close to the date of the alleged discrimination as possible, but no later than one hundred eighty (180) calendar days after the alleged discrimination. The complaint should include contact information for the Complainant such as name, address, phone number. The complaint should also provide a brief description of the issue including and the location, date, and persons involved in the alleged discrimination. Complaints may be filed by any person who believes that he or she has been excluded from participation in, been denied the benefits of, or otherwise subjected to discrimination under any Idaho Transportation Department (ITD) service, program or activity, and believes the discrimination is based upon disability.

ITD's ADA complaint form can be accessed from the ITD home page https://itd.idaho.gov, click the link 'Accessibility' and then select, Discrimination Complaints. Alternative means for filing a grievance can be provided by calling the Civil Rights Coordinator at 208-334-8884 or via the Idaho Relay Service at 7-1-1.

The response process to complaints begins the day the department receives a written complaint. Any ITD employee that receives a complaint for alleged discrimination should make reasonable efforts to forward such complaints to the Civil Rights Manager.

Within 10 calendar days of receipt of the complaint, the Civil Rights Manager or designee will contact the complainant to discuss the complaint and possible resolutions. Within 30 working days of receiving the complaint, the Civil Rights Manager or designee will provide the Complainant a written response. The response will explain the position of the Department and offer options for substantive resolution of the complaint, if warranted. Files will be retained in accordance with the agency's retention schedule.

The complainant's use of this grievance process as a means to achieve a prompt and equitable resolution of the grievance shall not be impaired by the complainant's pursuit of other remedies such as the filing of a complaint with the responsible federal and state agencies. Use of this grievance process is not a prerequisite to pursuing other remedies with outside agencies.

Appendix A - ADA References and Materials

REFERENCES

Idaho Transportation Department ADA Webpage
http://itd.idaho.gov/civil/ada.htm

Idaho Transportation Investment Program (ITIP)
http://itd.idaho.gov/itip/

28 CFR Part 35
http://www2.ed.gov/policy/rights/reg/ocr/28cfr35.pdf

ADAAG
http://www.ada.gov/stdspdf.htm

PROWAG
http://www.access-board.gov/prowac/draft.htm

US Access Board
http://www.access-board.gov/

US Department of Justice
http://www.ada.gov/

FHWA November, 12 2015 Memo: ADA Transition Plan Process
https://www.fhwa.dot.gov/civilrights/policy_statements/docs/ada_transition_plan_111215.pdf

Department of Justice/Department of Transportation Joint Technical Assistance[1] on the Title II of the Americans with Disabilities Act Requirements to Provide Curb Ramps when Streets, Roads, or Highways are Altered through Resurfacing https://www.ada.gov/doj-fhwa-ta.htm

Appendix B – Stakeholder and Public Involvement

ITD conducted two stakeholder workshops. Both were held virtually and in-person with statewide attendance. Over 100 stakeholders representing public agencies and non-profits with a nexus in transportation and access were invited. ITD also provided sign interpretation at the stakeholder meetings. The following information is part of the record of stakeholder participation:

Attendance List
Meeting Notes
Meeting Chat Transcript
Summary of Submitted Comments and Responses

July 14, 2021 – Workshop

In Person Attendance (ITD HQ staff conducting the meeting not listed):

External Stakeholders in Person:
Glenn Miles, Director Kootenai Metropolitan Planning Organization
Kevin Jernigan, Idaho Commission of the Blind and Visually Impaired
Amanda LaMott, Safety Engineer, Local Highway Technical Assistance Council
Steve Snow, Director, Idaho Council for the Deaf and Hard of Hearing
Jason Brinkman, ITD District 3 Engineering Manager
Blake Rindlisbacher, ITD Chief Engineer
Dan McElhinney, ITD Chief Operating Officer

Virtual Attendance (not all attendees identified themselves)

Full Name	User Action	Timestamp
Chris Usher (Guest)	Joined	7/14/2021, 9:53:04 AM
Alisa Anderson (Guest)	Joined	7/14/2021, 9:53:15 AM
Caliendo, Michael (FHWA)	Joined	7/14/2021, 9:53:30 AM
Cleveland, Francoise C	Joined	7/14/2021, 9:55:48 AM
Benjamin Earwicker	Joined	7/14/2021, 9:57:44 AM
Tony (Guest)	Joined	7/14/2021, 9:57:50 AM
Unknown User	Joined	7/14/2021, 9:57:56 AM
Amber Conklin	Joined	7/14/2021, 9:58:28 AM

Unknown User	Joined	7/14/2021, 9:59:27 AM
Ron Duran	Joined	7/14/2021, 10:00:12 AM
Brian Darcy	Joined	7/14/2021, 10:00:19 AM
Debbie Maxwell (Guest)	Joined	7/14/2021, 10:00:20 AM
Braden Cervetti	Joined	7/14/2021, 10:00:29 AM
Shannon Grow	Joined	7/14/2021, 10:00:41 AM
Russ Rivera	Joined	7/14/2021, 10:01:07 AM
+1 208-463-9111	Joined	7/14/2021, 10:01:27 AM
Sarah Taylor - Idaho Smart Growth (Guest)	Joined	7/14/2021, 10:02:49 AM
Kim MacPherson MRTA (Guest)	Joined	7/14/2021, 10:03:05 AM
Erik Kingston (Guest)	Joined	7/14/2021, 10:03:18 AM
Unknown User	Joined	7/14/2021, 10:04:41 AM
Unknown User	Joined	7/14/2021, 10:25:41 AM
Unknown User	Joined	7/14/2021, 10:04:54 AM
Unknown User	Joined	7/14/2021, 10:05:03 AM
Dana Gover (Guest)	Joined	7/14/2021, 10:06:40 AM
Erin Olsen	Joined	7/14/2021, 10:09:58 AM
Jason Brinkman	Joined	7/14/2021, 10:10:38 AM
Unknown User	Joined	7/14/2021, 10:16:43 AM
Steven (Guest)	Joined	7/14/2021, 10:16:55 AM
Zoe Ann Olson	Joined	7/14/2021, 10:27:57 AM
Unknown User	Joined	7/14/2021, 10:29:12 AM

Workshop Chat Transcript:

[9:59 AM] Alisa Anderson (Guest)
Has the presentation started, I am not hearing anything?

[9:59 AM] Ken Kanownik
The presentation has not started
[10:05 AM] Margaret Havey
We are working on getting the sound up and running before starting
(1 liked)
[10:15 AM] Russ Rivera
Margaret, I think the meeting host needs to turn on captions.
(1 liked)
[10:18 AM] Margaret Havey
Participants online need to click the three dots on the menu to turn on closed captioning. The host's do not display on the presentation
[10:27 AM] Alisa Anderson (Guest)
Are ADA requests and complaints referred out to the District Offices to manage or will they be managed at the State (Boise) level?

[10:28 AM] Unknown User Zoe Ann Olson (Guest) has temporarily joined the chat.
[10:28 AM] Christine Pisani (Guest)
Will you spending more time later in the presentation discussing improving accessible public transportation opportunities throughout the state?
[10:29 AM] Alisa Anderson (Guest)
Are ADA requests and complaints referred out to the District Offices to manage or will they be managed at the State (Boise) level?

[10:30 AM] Cleveland, Francoise C (Guest)
Also on the issue of complaints, your links on the website do not work. They route me back to the ITD landing page.
(1 liked)
[10:37 AM] Margaret Havey
Francoise, the Civil Rights office recently updated their web page, are you accessing the complaints form from https://itd.idaho.gov/civilrights/ ?
[10:39 AM] Christine Pisani (Guest)
This is a great identification of a gap that should be addressed in policy. This is where we could all come together and propose what will work best.

[10:40 AM] Jason Brinkman
The transition plan needs to address conflicts between federal interpretations and agreements, versus state code, such as IC 40-502.MAINTENANCE OF STATE HIGHWAYS. All state highways shall be maintained by the department at state expense, including sections of state highways located within local highway jurisdictions, except that in local highway jurisdictions where state highway sections are built to local highway jurisdictions standards, such as with curbs, sidewalks and areas available for parking and bus stops, the department shall maintain at state expense only the width of traveled way required for the movement of through highway traffic. The width of

traveled way to be maintained at state expense shall not exceed the width of the traveled way of the state highways approaching the incorporated areas.
(1 liked)
[10:41 AM] Cleveland, Francoise C (Guest)
@Margaret I accessed it from the main landing page per the instructions on the plan - through "accessibility", and also "Accessibility-Title", and Accesibilidad.

[10:43 AM] Margaret Havey
Cleveland, Francoise C Thank you, I will pass that along to our webmaster to get that linked fixed
(1 liked)

[10:50 AM] Christine Pisani (Guest)
The featured yellow pad for people with visual impairments directs people to the middle of the street and is not aligned with the crosswalk.
(1 liked)

[10:51 AM] Christine Pisani (Guest)
This is a frequent issue I see thoguhout Idaho
[10:55 AM] Russ Rivera
I have to join another meeting. Thanks, Ken and Margaret!
[10:55 AM] Cleveland, Francoise C (Guest)
In the plan, it states this program will be publicly accessible. Will the public need to enter/understand the technical aspects in order to enter something into the system? If so, will there be any training provided for the program?
(1 liked)
[11:00 AM] Sarah Taylor - Idaho Smart Growth (Guest)
Does/Will the color-coding on the map categorize non-compliance due to maintenance vs non-compliance due to non-existing infrastructure?
[11:02 AM] Cleveland, Francoise C (Guest)
For those who do not have access to computers or internet, will there by an off line option to submit non-compliance areas?
(1 liked)
[11:07 AM] Margaret Havey
Cleveland, Francoise C yes, in section 7 of the draft plan it states that people can file a complaint by calling our Civil Rights Program Manager (number provided) or via the Idaho Relay Service a 7-1-1

[11:10 AM] Cleveland, Francoise C (Guest)
Thanks. I guess this was separated in my mind between an individual complaint/request for accommodation and general observations of non-compliance by the public.
[11:10 AM] Rachel Chipman (Guest)
Are non-compliant pedestrian pushbuttons being considered a barrier to access? Will they be assessed and programmed for replacement if not compliant with this plan?
(2 liked)

[11:11 AM] Jeremy Maxand (Guest)
a transition plan should include a self-inventory, budget, and schedule for when the owner of the facility will upgrade the deficiency.
(1 liked)

[11:14 AM] Alisa Anderson (Guest)
The funding sources presented are competitive and small local cities do not have the resources to even apply therefore those projects do not get addressed.

[11:15 AM] Cleveland, Francoise C (Guest)
To my comment above - it may be beneficial to be clear in the communication plan that the grievance procedure is more broad than stated and can be used for the general public to register non-compliance even if they are not individually affected.
(1 liked)

[11:18 AM] Margaret Havey
Cleveland, Francoise C that is a great comment that fits better in the next block, we will bring it up then
(1 liked)

[11:24 AM] Christine Pisani (Guest)
Desperately need training for the local "ACHD's" to not block sidewalks with all of the construction signs
(1 liked)
[11:27 AM] Christine Pisani (Guest)
Will Spanish and other alternate languages be available?
(1 liked)

[11:27 AM] Zoe Ann Olson (Guest)
And other languages in compliance with Title VI

[11:28 AM] Zoe Ann Olson (Guest)
We need accessible pathways via the Five Mile and Emerald St. Bridges.
[11:30 AM] Erik Kingston (Guest)
Detectable transition surfaces are important. https://youtu.be/OUFcmiUKpMU
Why inclusive planning matters: bike ramps and roundabouts - YouTube
This bike offramp is intended to keep cyclists out of roundabout traffic. It routes bikes from the roadway to the sidewalk; once they use the crosswalk there...
youtu.be

[11:35 AM] Christine Pisani (Guest)
I would like to request the survey in Spanish please
(1 liked)

[11:38 AM] Zoe Ann Olson (Guest)
Thank you, Dana.

[11:38 AM] Christine Pisani (Guest)
Wouldn't it make more sense to provide a comprehensive approach to fix all of the others issues in a location and them move to the next. completely agree with Dana.
(1 liked)
[11:40 AM] Erik Kingston (Guest)
Amen, Dana. We can set up a Zoom meeting with advocates and stakeholders to provide input.
(1 liked)
[11:44 AM] Christine Pisani (Guest)
Please send us the links to this survey after you make updates based on our comments . I will need English and Spanish. Would like to get this out to many people with disabilities.
(1 liked)

[11:45 AM] Zoe Ann Olson (Guest)
And other languages, please.
(1 liked)

[11:48 AM] Sarah Taylor - Idaho Smart Growth (Guest)
For future meetings with the split in-person and virtual, maybe give Ken a headset so we can hear him more clearly, just my $.02 :)
(1 liked)

[11:49 AM] Alisa Anderson (Guest)
Is the presentation on 7/21 the same as today or a Part 2 (i.e. additional information)?

[11:49 AM] Christine Pisani (Guest)
Thank you for including me in this vital conversation to people with disabilities statewide. I have to go to another meeting. I look forward to having you present at a number of groups I will be in touch with you through e-mail.

[11:50 AM] Margaret Havey
Thank you Christine Pisani for all your comments!
(1 liked)

[11:51 AM] Christine Pisani (Guest)
I have my hand up...

[11:53 AM] Zoe Ann Olson (Guest)
Thank you! We look forward to additional information and input.

[11:55 AM] Brian Darcy (Guest)
My concern is that the "squeaky wheel" gets the oil... representing an agency that serves the state statewide - but also has a school that sits on a state highway (46 in Gooding) we don't have a lot of folks that might fill out the survey (low incidence population -

Blind/Visually Impaired and Deaf/Hard of hearing) - but have a high need - School serves as a residential school with kids from preschool to high school living right along the highway - need accessible crossings to get to the store - how do we ensure that we will get a voice in these decisions?
(1 liked)

Workshop Meeting Notes:

Block 1

- Jason Brinkman, District 3 Design/Construction Manager (Acting DE): One question is underlying data for compliance. If you look at Street Smart, for example, ramps at Front, Myrtle and Broadway in Downtown Boise were built to meet compliance. Now, the data you're showing us, indicates that 80-90% of those ramps aren't compliant. Who is quality controlling the data?
- Ken Kanownik, ITD Planning Services Manager: A ramp might have been constructed, and be compliant, but covered in debris. LIDAR would have picked that up. Those ramps would need to be filtered out.
- Jason Brinkman: It doesn't seem like we understand the scale of the problem and it due to a fundamental misunderstanding of data. I bring this up as it is foundational to this effort and order of magnitude of the problem.
- Glenn Miles, Kootenai Metropolitan Planning Association**:** Will this policy change adjust for significant gaps and costs between locals and ITD. Previously, locals were responsible for repairs outside ITD's right-of-way. Are the locals now responsible if there are ADA issues that ITD detects? And who is responsible for paying for it?
- Alisa Anderson, Public Transportation Working Group Member: Do we send ADA complaints to HQ or the districts?
- Russ Rivera: ITD Office of Civil Rights: We have new process in which we generally receive the complaint. We work with the district to resolve it along with legal and the communication office. Our timeline for them to be resolved is 160-180 days.
- Ken Kanownik: We will review more in the grievance section in block 3.
- Christine Pisani, Idaho Council on Developmental Disabilities: Will this discussion include public transit opportunities through the state?
- Jason Brinkman: It's been our opinion that each jurisdiction, cities, and counties do have shared responsibility.
- Glenn Miles: Where is that language about shared responsibility in this presentation? Do we need to include this?
- Ken Kanownik: One of the main points from FHWA is that while we can delegate, responsibility is not accountability specific to maintenance.
- Jason Brinkman: FHWA can't supersede Idaho code. It precludes ITD from maintaining local responsibility.
- Ken Kanownik: How do we meet federal and state requirements? There are different definitions of activities whether it is sweeping or upgrading. How are local agreements enforced?
- Glenn Miles: A federal provisions guide planning assets owned by the State of Idaho. It also shows that if the state builds it, who take care of it. It is an important policy to include in the document, with differing opinions.
- Francoise Cleveland, AARP Idaho: The links on the website do not work. They route me back to the ITD landing page.

- Christine Pisani: There is a great identification of gaps that should be addressed in policy. This is where we could all come together and propose what will work best.

Block 2

- Ken Kanownik: LIDAR is not used as a system of record. For programming to reduce administrative time and burden. Inventory will be improved. For instance, it may pick up debris and show it as non-compliant.
- Christine Pisani: The featured yellow pad for people with visual impairments directs people to the middle of the street and is not aligned with the crosswalk. This is a frequent issue I see throughout Idaho.
- Dana Gover: Northwest ADA Center: With the example shown, it looks like diagonal ramps into the road.
- Ken: This is a narrow spot due to vegetation that's overgrown. LIDAR is picking up the minimum width. We can use Twin Falls as an example. Here is an example of one with no landing or detectable service.
- Glenn Miles: It's the gap that's an issue here.
- Glenn Miles: Does this address transportation stops and access from bus stops to shelter?
- Ken Kanownik: We have locations with signs that is included with point cloud data.
- Francoise Cleveland: In the plan, it states this program will be publicly accessible. Will the public need to enter/understand the technical aspects in order to enter something into the system? If so, will there be any training provided for the program?
- Ken Kanownik: Our mapping tool allows you to enter information. We can provide an instructional video created by the Office of Communication.
- Sarah Taylor, Idaho Smart Growth: Does/will the color-coding on the map categorize non-compliance due to maintenance vs non-compliance due to non-existing infrastructure?
- Ken Kanownik: Map information can be analyzed in different ways. We can source information into Excel and process and sort it.
- Shannon Grow, Lewis Clark MPO: It appears there are three funding sources or ways to come into compliance. Two are for locals to apply to ITD. How does throwing out grant funding to locals through the state make meet compliance?
- Ken Kanownik: There is a prioritized list. What should our priorities be? Some states extract out access improvements from projects and create a prioritized list of improvements.
- Shannon Grow: ITD's focus is to do highway projects and not improvements.
- Ken Kanownik: When we have local maintenance agreements, it does not include accountability. Locals select projects. That is a way to address items on the system. ADA does not require who does the work, rather that it gets done.
- Shannon Grow: States should have inventory of what's built into interstate plan.
- Ken Kanownik: ITD used to select locations.
- Glenn Miles: Isn't the TAP program already oversubscribed? It's not something that gives locals a warm and fuzzy feeling for TAP selection criteria for state highway connected routes.
- Ken Kanownik: Actually, looking at candidates from a pool of projects that meet strong criteria. There are aspirational goals in partnership with LHTAC.
- Glenn Miles: It looks aspirational. It would also be good to work with MPOs beyond just LHTAC programming.

- Rachel Chipman, ACHD ADA Coordinator: Are non-compliant pedestrian push buttons begin considered an access? Will they be assessed and programmed for replacement if not compliant with this plan?
- Ken Kanownik: Barriers to access will be included.
- Jeremy Maxand, Living Independence Network Corporation: A transition plan should include a self-inventory, budget, and schedule for when the owner of the facility will upgrade the deficiency.
- Alisa Anderson: Because of the funding and competitive nature, some locals don't apply.
- Ken Kanownik: Are there ways to address and emphasize a more comprehensive approach? For instance, Cascade, Idaho, and their needs as an example. Are we over or under analyzing their needs? Are there recommendations of more or less to do?
- Amanda LaMott, LHTAC: We see strong applications from locals that can't get contractors to come to their town to work or, they want to bundle projects as opposed to individually submitting applications for each one. For instance, projects in a small town on U.S. 95. They might want to go after ramp improvements for 1, 2 or 3, but can their application compete?
- Ken Kanownik: Don't wait to be unilateral. It could be seen as unfair.
- Glenn Miles: LHTAC has done a great job with their small bridge projects.
- Amanda LaMott: With one project one local had, they hired a contractor and ramps were built. But they weren't compliant, and they couldn't get the contractor back. Now, some of these locals don't want to apply for federal funds due to the risk and hassle.
- Glenn Miles: Is there a partnership with FHWA funds, as they are the biggest users to go to transit.
- Alisa Anderson,: The funding sources presented are competitive and small local cities do not have the resources to even apply therefore those project do not get addressed.

Block 3

- Francoise Cleveland: To my comment above, it may be beneficial to be clear in the communication plan that the grievance procedure is more broad than stated and can be used for the general public to register non-compliance even if they are not individually affected.
- Christine Pisani: Please send us the links to this survey after you make updates based on our comments. I will need English and Spanish. Would like to get this out to many people with disabilities.
- Ken Kanownik: We can let Russ Rivera know about the broken link on the Civil Rights site.
- Christine Pisani: Desperately need training for the local "ACHD's" to not block sidewalks with all the construction signs. Will Spanish and other alternate languages be available?
- Ken Kanownik: Upon request.
- Zoe Anne Olson, Intermountain Fair Housing: Any other languages with compliance with Title VI. We need accessible pathways via the Five Mile and Emerald St. Bridges.
- Dana Gover: Question of people trying to reach an accessible pathway that isn't accessible.
- Ken Kanownik: We are asking that priorities be ranked.
- Dana Gover: This is putting disability groups against each other. To rank is ridiculous in my opinion. We need to look at this holistically, and not fix parts of it.
- Ken Kanownik: Great feedback. Maybe with types of barriers it expands the accessible network.
- Dana Gover: The sound has been difficult to hear. It would be good if you can come and present to some of these disability groups.
- Ken Kanownik: We can come out and speak to your organizations.
- Sarah Taylor: For future meetings with the split in-person and virtual, maybe give Ken a headset so we can hear him more clearly, just my two cents.

- Alisa Anderson: Is the meeting on 7/21 the same as today or a Part 2 (ie: additional information)?
- Ken Kanownik: The meeting is the same.
- Francoise Cleveland: Who will be taking the survey? Will results be skewed?
- Ken Kanownik: The survey asks people to self-identify. Everyone's results will be included, reviewed and considered.
- Christine Pisani: Can the survey be revised to rank barriers?
- Ken Kanownik: We can revisit the survey and are seeking meaningful survey results.
- Shannon Grow: There are so many needs, where do we put it? Locals will want more, but districts know what's going on. It works differently.
- Ken Kanownik: One challenge is limited funding and many needs. We hear complaints and what to collaborate.
- Brian Darcy, Idaho Educational Services for the Deaf and Blind: My concern is that the "squeaky wheel" gets the oil... representing an agency that serves the state statewide - but also has a school that sits on a state highway (46 in Gooding) we don't have a lot of folks that might fill out the survey (low incidence population - Blind/Visually Impaired and Deaf/Hard of hearing) - but have a high need - School serves as a residential school with kids from preschool to high school living right along the highway - need accessible crossings to get to the store - how do we ensure that we will get a voice in these decisions?
- Dan McElhinney, ITD Chief Operations Officer: We appreciate you showing up and getting your feedback. ITD is seeking continuous improvement and are committed to working with our partners.
- Blake Rindlisbacher, ITD Chief Engineer: We appreciate everyone's feedback and Ken's leadership. We are trying not to pit one against another.
- Ken Kanownik: We will get the survey adjusted and send a copy out to you. We will address feedback and find time to present to organizations that request it.

July 21, 2021 – Workshop

In Person Attendance (ITD HQ staff conducting the meeting not listed):

External Stakeholders in Person:
Cynthia Gibson, Executive Director, Idaho Walk Bike Alliance
Laila Kral, Administrator, Local Highway Technical Assistance Council
Deb Reiland, Idaho Council on Aging

Virtual Attendance (not all attendees identified themselves)

Michael White
Michael Caliendo
Mark Leeper
Steve Decker
Brandie Kramer
Amber Conklin
Bruce Olenick
Craig Shaul
Kevin Jerrigan
Erik Kingston
Erin Bennet

Tara Contreas
Jessica Williams
Jillian Garrigues
Russ Rivera

Workshop Chat Transcript:

[10:39 AM] Bruce Olenick - DEQ (Guest)
Do you have all online people muted?

[10:40 AM] Bruce Olenick - DEQ (Guest)
On the last slide you did not mention the local project integration.

[10:41 AM] Bruce Olenick - DEQ (Guest)
I can't easily describe my question without audio

[10:41 AM] Bruce Olenick - DEQ (Guest)
no

[10:41 AM] VTC D5 ConfRoom 1 53379 (Guest) has temporarily joined the chat.

[10:42 AM] Erik (Guest)
yes yes yes yes yes yes

[10:50 AM] Mark Leeper (Guest)
Sorry! I didn't introduce myself - Mark Leeper, Disability Action Center - Northwest (northern Idaho)

[11:02 AM] Erik Kingston (Guest)
Is ITD working with disability advocates and technical assistance providers to review and assess facilities and infrastructure?

[11:03 AM] Erik Kingston (Guest)
Amen Cynthia!

[11:04 AM] Erik Kingston (Guest)
The Idaho Access Project can host a sample subdivision audit with planners.

Workshop Meeting Notes:

Block 1

- Laila Kral, LHTAC Administrator: Just to confirm, is the 15 years and $30 million identified in this plan standalone, or in addition to existing funding?
- Margaret Havey, ITD. It is an investment from other highway projects. We will be talking about this more in Block 2.

Block 2

- Debra Reiland, Idaho Commission on Aging: So does the green mean it's ok then?
- Margaret Havey: Yes, there are different grades of compliance.
- Debra Reiland: So whose responsibility is it to maintain this infrastructure?
- Margaret Havey: It is locals that maintain it. This effort is looking to improve communications to do that.
- Debra Reiland: I am a nurse and there is a fellow by Ross Park between 5th and 4th street near Ross Street. He is in an electric wheelchair and rides to the store. There are signals there, but it is a very dangerous intersection. Who would maintain that intersection? Or is that not your purpose with this plan?
- Cynthia Gibson, Idaho Walk Bike Alliance: Ramps are important. Audio is important. Push buttons are important. Will ITD be installing the audible crosswalks?
- Margaret Havey: Improvements could include push buttons, AVS system, etc.
- Cynthia Gibson: This includes curb ramps. Diagonal ramps are acceptable, but not best practice.
- Margaret Havey: They are not best practice, but there are a number of them on the system. The ADA Plan does not target diagonal ramps. ITD is looking to maximize its limited money and address greater barriers to accessibility. This plan will not dictate type of ramps—that's in the design manual. This does come up quite a bit. Public feedback as part of this survey is important.
- Debra Reiland: Why is this ramp not compliant? (Looking at example on screen).
- Margaret Havey: There is no turning space. No detectable warning. It is a diagonal ramp.
- Cynthia Gibson: This tool really allows you to drill down to a degree. Does it also show pavement markings?
- Margaret Havey: It will show marked and unmarked surfaces.
- Debra Reiland: Does this cover greenways that connect to pathways for instance, in Pocatello?
- Margaret Havey: That is something that is eligible for the Transportation Alternatives Program.
- Debra Reiland: We are trying to connect them. As a biker, when you go on the highway, travel is so fast. Some of these paths need to connect so that someone is not killed in the process.
- Margaret Havey. A number of people have talked about connecting pathways previously.
- Laila Kral: Leveraging funds, will the state use money for ramps, sidewalks and crossings?
- Margaret Havey: Any project that will modify barriers to access reasonably will include that.
- Cynthia Gibson: You mentioned half a million dollars a year. Will you expand beyond that?
- Margaret Havey: Locals can apply. LIDAR can be repeated every few years as we continue that progress.
- Bruce Olenick: My question is more involved. It's one thing to mention local integration. You work with the locals, you work with maintenance, etc. But if you are vision impaired for instance, the jurisdiction fix is just parochial. If you are in a wheelchair and want to continue your journey, how is pouring money into one fix, addressing a problem? How is it continuous?

- Margaret Havey: This is what we hope to address with the program. It's piecemeal. Five thousand here, 60 thousand there. That is why the public and stakeholder input is important. We will ask about what the priorities are. We want to know and be as judicious as possible.
- Bruce Olenick: Working with locals jurisdictions and municipalities is important.
- Margaret Havey: Because it is on local networks, it would be great to do, but we can't plan for locals. We have to address the state highway system.
- Mark Leeper, Disability Access Center Northwest: Clarification of Bruce's comment. Are you suggesting state highways should take a higher priority?
- Bruce Olenick: Yes, it's what I'm getting at. We need to integrate improvements into the state system. If you cross 4th and 5th or Benton Street, it's nearly impossible in a wheelchair. Trying to put money in a place that is a bigger bang for your buck.
- Mark Leeper: Thank you.
- Margaret Havey: We hear it in the Boise meeting. We want to take a more holistic approach.

Block 3

- Debra Reiland: How does the money work? Does Boise get the majority of it?
- Laila Kral: We can talk through the funding. ADA Transition, that will address any barriers and is state money. Population doesn't affect that. LHTAC will administer TAP. Population doesn't play into that. This addresses what the needs are, trying to make those connections. We leverage those funds.
- Debra Reiland: Depending on the grant, communities need to get organized.
- Laila Kral: There are resources for that. Engaging with LHTAC and Cynthia's group, so bike and pedestrian improvements can be incorporated.
- Cynthia Gibson: Some communities will need ITD to provide training, for instance on what a compliant curb ramp is.
- Margaret Havey: ITD staff has this information and make it available to locals.
- Laila Kral: We offer ADA training programs an work with ITD on messaging so it is consistent.
- Margaret Havey: We want to step up internal training so everyone is aware of standards for ADA ramps, for example.
- Laila Kral: We will have some workshops in October with our partners. Amanda LaMott will be involved with this.
- Cynthia Gibson: I hope training includes wheelchairs, blindfolds and canes. It is important to do.
- Erik Kingston, Idaho Housing & Finance: Is ITD working with disability advocates and technical assistance providers to review and assess facilities and infrastructure?
- Margaret Havey: We have invited all sorts of stakeholders and technical assistance providers as part of this process.
- Erik Kingston: The Idaho Access Project can host a sample subdivision audit with planners.
- Mark Leeper: You have done a marvelous job with details, my concern is that with Bruce, intending to take a macro view and not incorporate greater issues. What are the priorities so it can be a more consistent program.
- Margaret Havey: That is a great comment. Our current ADA program is structured. What is viewed as most important? What is the greatest need? Currently with the program, you might have a community submit three applications. Some locals don't like grant programs. As the grant cycle is updated, it can be reviewed.

Submitted Comments:

Comment Summarized	Submitter	Response
Submitted a marked up copy of draft plan with numerous comments.	FHWA - Idaho Division Office	ITD Staff reviewed addressed comments. Staff conducted a comment review session with FHWA.
Many ramps replaced as part of ITD projects within the last three years show a non-compliant. I think there is a need to join the construction review process with the inspection. It is disheartening to know we can replace a ramp, and it still does not meet the compliance.	Bannock Transportation Planning Organization	The LIDAR based inventory does identify ramps that were constructed as compliant as non-compliant when maintenance issues arise.
The attributes in the pop-up are all code that knows one but the developer.	Bannock Transportation Planning Organization	The map shared was a draft form, final will be more public friendly.
All the attributes are shown, I would only include those that mean something.	Bannock Transportation Planning Organization	The map shared was a draft form, final will be more public friendly.
The mapping exercise was very good, but it is static. I expected that a map on my progress would be updated as corrections were made.	Bannock Transportation Planning Organization	The map shared was a draft form, final will be more public friendly.
Schedule for Compliance (page 12). The ITD action items listed in the Schedule for Compliance is data collection, QC, and putting out call for projects. It does not appear that any activities to remove barriers are actually done by ITD, with the exception of reporting ADA improvements that were required with highway projects. Thus, it does not appear that ITD truly desires or has a plan to remove barriers on the State Highway System.	Lewis Clark Valley Metropolitan Planning Organization	Addressed and changes made
ADA Transition Program Funding. This program allows the local agencies to apply for funds (currently $60K max) to update facilities on the State Highway System. It was explained at the meeting that ITD has tried to do improvements in the past but was criticized for the choices in projects that were made. Therefore, the State created the curb ramp program and is now trying to create priorities for that program to better score	Lewis Clark Valley Metropolitan Planning Organization	Addressed and changes made

and broaden the scope for accessibility projects. It is my understanding that this program is budgeted for $500,000 every year, but the funding is not fully utilized by the locals. This program puts all the risk and time on local agencies to remove barriers on the State system.		
Transportation Alternatives Program. It is proposed that $500,000 of this program will be dedicated to the State Highway System, and again putting the burden on the local agencies. The TAP program in Idaho is very competitive and only about 25% of projects were funded in 2020. Taking $500,000 for state facilities from an already underfunded program is not an innovative solution.	Lewis Clark Valley Metropolitan Planning Organization	Addressed and changes made
Instead of trying to enhance the ADA Transition Program Funding for the locals to do the work, why not distribute the $500,000 to one district annually and revolve the program on an annual basis (i.e. $500,000 to district 1 in 2022, $500,000 to district 2 in 2023, $500,000 to district 3 in 2024, $500,000 to district 4 in 2025, and $500,000 to district 5 in 2026, $500,000 to district 6 in 2027, then start over) The district (or LHTAC) then can work with accessibility partners and local jurisdictions to set priorities and projects. ITD then contracts the $500,000 for the work. This solves the problem that some projects are too small as stated in the meeting and it also takes the work off of the locals. If you didn't want to have a district wait 7 years, then you could even split the pot (i.e. $250,000 to districts 1 and 2 in 2022, and so on). This would be a much more meaningful way to remove barriers and correct deficiencies.	Lewis Clark Valley Metropolitan Planning Organization	Addressed and changes made
Comments submitted in letterform.	Idaho Walk Bike Alliance	ITD staff reviewed. Comments within the scope of an ADA Transition Plan were reviewed for feasibility and accuracy. Comments outside the scope of an ADA Transition Plan were forwarded to appropriate staff. ITD staff conducted a review

		of comments with the Idaho Walk Bike Alliance
A prioritization plan of how these projects will be considered should be included. For example, will projects be completed based on number of complaints, the severity of the problem or the number of individuals impacted? Further, what is the timeline to get projects completed? Residents shouldn't have to wait years to be able to navigate their neighborhoods safely.	AARP - Idaho	ITD staff added detail to the timeline of completion and added additional guidance on project prioritization.
A plan of how to reach and receive comments/suggestions/locations of concern from those who do not have access to internet should be included	AARP - Idaho	Addressed and changes made
we need to plan for the long-term vitality of our communities as well as for those who live there	AARP - Idaho	This plan addressed long-term vitality within the scope of ADA transition

Idaho Transportation Department Major ADA Transition Plan Activities

<table>
<tr><th colspan="3">Federal Fiscal Year 2022</th><th colspan="3">Federal Fiscal Year 2023</th><th colspan="3">Federal Fiscal Year 2024</th></tr>
<tr><th>Fall 2021</th><th>Winter 2022</th><th>Spring/Summer 2022</th><th>Fall 2022</th><th>Winter 2023</th><th>Spring/Summer 2023</th><th>Fall 2023</th><th>Winter 2024</th><th>Spring/Summer 2024</th></tr>
<tr><td rowspan="2">Adopt updated transition plan</td><td>Report FY21 construction activities</td><td rowspan="2">Provide ADA training to contractors and local agencies</td><td rowspan="3">ADA Transition Program project outreach</td><td>Report FY21 construction activities</td><td>Re-Inventory State Highway System with LiDAR</td><td rowspan="2">Call for applications Transportation Alternatives (added ADA scoring criteria, FY26,27 funding)</td><td>Report FY23 construction activities</td><td>Provide ADA training to contractors and local agencies</td></tr>
<tr><td rowspan="2">Select FY2024 ADA Transition Program projects</td><td rowspan="2">Select FY2025 ADA Transition Program Projects</td><td>Provide ADA training to contractors and local agencies</td><td>Report Updated LiDAR based ADA Inventory</td><td>Update forecast of reaching a compliant State Highway System</td></tr>
<tr><td>Call for applications Transportation Alternatives (added ADA scoring criteria, FY24,25 funding)</td><td rowspan="2">Project construction (previous ADA Transition Plan programming)</td><td rowspan="2">Project construction (previous ADA Transition Plan programming)</td><td rowspan="2">ADA Transition Program project outreach</td><td rowspan="2">Select FY2026 ADA Transition Program projects</td><td rowspan="2">Project construction (first year of new ADA Transition Program projects)</td></tr>
<tr><td>Add driveway/ approach and other ADA inventory</td></tr>
</table>

FHWA reporting checkpoints

Action Items

Funding Opportunities