

ADA TRANSITION PLAN UPDATE 2020



August 2020

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Agency of Transportation

The Vermont Agency of Transportation (VTrans), as a direct recipient of federal transportation funding, is responsible for ensuring compliance with ADA standards as they relate to the provision of transportation services, activities, and programs. In addition, VTrans remains committed to ensuring meaningful access and full participation by persons with disabilities, while seeking to remove remaining barriers to fair and dignified inclusion for people with disabilities.

VTrans does not discriminate on the basis of disability in admission to its programs, services, or activities, in access to them, in treatment of individuals with disabilities, or in any aspect of its operations. VTrans also does not discriminate on the basis of disability in its hiring or employment practices.

VTrans has established a formal grievance procedure where persons with disabilities can identify accessibility concerns that they may have and the Agency will respond to these concerns in a timely, communicative, and, if preferred, confidential process.

I represent VTrans in leading the effort to transitioning Vermont to be accessible to all. My commitment to these efforts will be carried out throughout the organization and progress will be reported accordingly and submitted with the periodic ADA Transition Plan update.



Joe Flynn, Secretary
Agency of Transportation

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Vermont Agency of Transportation
ADA Transition Plan Update
2020

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1. Introduction/Background

Scope of this Plan

The scope of this ADA Transition Plan for the Vermont Agency of Transportation (VTrans) is to assess all VTrans facilities and services used by the public. This includes public buildings, such as airport terminals and VTrans offices, and public facilities used by pedestrians such as sidewalks and pedestrian signals. The overall intent of the plan is to: 1) inventory all of these facilities and services; 2) identify any barriers to accessibility; 3) provide a schedule and method for addressing any barriers; and 4) ensure that the public is aware of this plan and has the opportunity to provide input.

VTrans completed and published its first ADA Transition Plan in May of 1995. The original plan included a comprehensive inventory of VTrans facilities, including a process for self-evaluation concerning the accessibility of those facilities. The intended purpose of the development and implementation of an ADA Transition Plan is the evaluation of existing facilities for accessibility, the identification of needed upgrades for improvement, and the subsequent development of a plan and scheduled timeframe for making the identified accessibility improvements. The original plan identified those public facilities requiring ADA upgrades, the cost of each improvement, and a timeline for the completion of each improvement. The VTrans properties and facilities inventoried and identified in 1995 as needing ADA improvements as a result of the initial self-evaluation process, and subsequently listed in the original transition plan, have been upgraded.

This plan was last updated in 2014. The purpose of this Transition Plan update is to identify the accessibility improvements completed since the last Transition Plan update in 2014, resolve accessibility deficiencies as they arise and ensure compliance with current standards or guidelines, establish a plan for addressing these issues, conduct a public involvement process to gather input, and establish a clear process for receiving any accessibility complaints.

VTrans takes accessibility of its facilities seriously and strives to continuously improve in this area. In addition to the official letter of responsibility from VTrans Secretary Joe Flynn, the Agency has the [VTrans ADA Notice of Nondiscrimination](#) posted on its Office of Civil Rights web page.

2. Framework and Regulations for ADA Compliance

A. ADA Program Administration

VTrans' ADA Program is administered by the Civil Rights Office. The role of the Civil Rights Office is to monitor the administration of programs to ensure compliance under Vermont and federal laws within VTrans' contracting practices, programs and activities. This division is dedicated to upholding and enforcing all state and federal statutes prohibiting discrimination of persons based on race, color, religion, sex, national origin, age, disability, pregnancy, sexual orientation, genetic information or gender identity or expression.

B. Official Responsible for Implementing the Transition Plan

The Secretary of the Vermont Agency of Transportation is responsible for the implementation of this Plan.

Joe Flynn, Secretary

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C. Designation of an ADA Coordinator

The role of the ADA Coordinator is to manage all programs and policies related to compliance with the Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act of 1973, Title II, Title VI, and other federal and state laws associated with regulations for persons with disabilities. The ADA Coordinator acts as the primary contact for all complaints relative of possible discrimination against people with disabilities.

The ADA Coordinator will address complaints, investigate formal grievances, and track the overall progress of the implementation of the Transition Plan. In addition, the ADA Coordinator will coordinate a multidisciplinary approach to implement and manage VTrans' ADA compliance effort. This effort includes developing policies and procedures for VTrans. In addition, the VTrans Bicycle and Pedestrian Program Manager is instrumental in providing technical support related to accessibility for facilities planning, design and construction efforts.

The VTrans ADA Coordinator is responsible for coordinating the efforts of the Vermont Agency of Transportation in complying with ADA responsibilities. The ADA Coordinator is responsible for tracking the Plan's implementation and updates, responding to grievances, ensuring policies and procedures are current, responding to requests for accessible materials or auxiliary aids and services, and conducting or arranging ADA training for VTrans.

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D. Role of Federal Highway Administration

The Federal Highway Administration has provided guidance to state Departments of Transportation on development of Transition Plans that meet the requirements of the Americans with Disabilities Act. Most of the regulations that guide the content of Transition Plans are in Title 28 of the Code of Federal Regulations (CFR).

E. Regulations that Guide ADA Compliance

Implementing Regulation	Responsibilities
28 CFR 35.105	Self-Evaluation <ul style="list-style-type: none"> • Evaluate current services, policies and practices and make any revisions necessary 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 revisions made
28 CFR 35.106	Notice <ul style="list-style-type: none"> • Make ADA information available to the public regarding applicability to ADOT&PF services, programs and activities
28 CFR 35.107	Responsible Employee/Grievance Procedures <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
28 CFR 35.130; 28 CFR 35.149	General Prohibitions Against Discrimination <ul style="list-style-type: none"> • Do not exclude people with disabilities from participation in or deny benefits of ADOT&PF services, programs or activities • Do not discriminate on the basis of disability
28 CFR 35.133	Maintenance <ul style="list-style-type: none"> • Maintain facilities and equipment required to be accessible to persons with disabilities in operable working conditions
28 CFR 35.150	Existing Facilities <ul style="list-style-type: none"> • Operate each service, program or activity in a manner accessible to and useable 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
28 CFR 35.151	New Construction and Alterations <ul style="list-style-type: none"> • Design, construct and alter public facilities in a manner readily accessible to and useable by persons 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
28 CFR 35.160; 28 CFR 35.161	Communications/Telecommunications <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 ADOT&PF services, programs and activities
28 CFR 35.163	Information and Signage <ul style="list-style-type: none"> • Provide information about the existence and location of accessible services, activities and facilities

3. Standards for Accessibility of VTrans Facilities

Since the completion of the original VTrans Transition Plan, the [U.S. Access Board](#) has made significant progress towards adopting standards for pedestrian facilities in the broader context of what is referred to as the “Public Rights of Way” (PROW). An advisory committee – the Public Rights-of-Way Access Advisory Committee (PROWAAC) – published a final report entitled, “Building a True Community,” in January 2001. Subsequent to that report, the Access Board released draft guidelines based on the Committee's initial 2001 report, in 2002. More recently, in 2011, the Board issued [Proposed Guidelines for Pedestrian Facilities in the Public Right-of-Way Accessibility Guidelines](#) (PROWAG).

In addition, the U.S. Access Board has issued standards to achieve accessibility of shared use paths, recreation facilities, buildings and sites and public transportation facilities.

When assessing existing building facilities for accessibility and when designing new facilities or alterations, the Agency uses the [2010 Department of Justice ADA Standards](#).

Although PROWAG has not undergone final rulemaking, FHWA issued a [memorandum](#) in 2006 indicating that public agencies should use the latest guidance issued by the Access Board when designing and constructing new facilities for pedestrians. VTrans has been using PROWAG as the standard for accessibility of facilities in the public right of way since the issuance of that FHWA memorandum.

VTrans has updated a number of standard drawings and construction specifications since the development of PROWAG. As a result, VTrans projects designed and constructed after 2006 have adhered to the most current and applicable standards for accessibility.

A. Standard Drawings

VTrans utilizes standard drawings to provide engineering details of sidewalks and curb ramps to ensure consistent design application and construction of accessible pedestrian features. The standard drawings are one element of project contract plans put out to bid prior to the commencement of site construction. VTrans has four primary standard drawings that address elements of accessibility. Drawings C-3A and C-3B detail a number of different configurations of curb ramps, median islands and active rail crossings. Drawings C-2A and C-2B detail sidewalk crossings of driveways and how to maintain accessibility.

B. APS and VTrans Standard Specifications

When the 2005 Revised Draft guidance was issued by the Access Board, VTrans was in the process of updating its standard specifications for construction. As a proactive measure, the VTrans construction specifications were amended to require Accessible Pedestrian Signals (APS) and pedestrian pushbutton assembly design consistent with the 2005 revised draft guidance. As a result, any pedestrian signal projects that have gone out to bid and been completed since the 2006 VTrans ‘Standard Specifications for Construction’ were adopted have included APS upgrades such as pushbuttons with integrated locator tones, vibro-tactile features, and audible information indicating the ‘Walk’ phase of the signal. These design specifications have been retained in the subsequent VTrans 2011 and 2018 Standard Specifications for Construction.

VTrans provides periodic technical assistance on the elements of accessibility for sidewalks. In 2015 and 2018, VTrans conducted training for municipalities on designing for accessibility. Additionally, in 2018, a training was provided to the VTrans Pavement Design section and engineering consultants who regularly design plans for that group. Paving projects are one of the main ways that curb ramps are

updated along the network of state numbered highways. Training on Transition Plans was provided in 2018 to the Regional Planning Commission staff and also the Transportation Advisory Committee of the Chittenden County Regional Planning Commission.

4. The Self-Evaluation Process

A. General Background – Jurisdiction and Responsibility

For each of the facilities covered by this plan update, a self-evaluation process has been employed or will be conducted to assess accessibility. The self-evaluation method focuses on the present condition, physical features, and barriers to accessibility of existing facilities. Because VTrans has engineering standards and specifications in place that are based on PROWAG, new pedestrian facilities are designed and constructed in compliance with the most current standards and specifications for accessibility.

Sidewalks on the system of highways under state jurisdiction are constructed and maintained to eliminate potential barriers by following the standards in PROWAG. Sidewalks and curb ramps are sometimes included in a roadway reconstruction or bridge project. VTrans paving projects address curb ramps that are within project limits, but do not address connecting segments of sidewalk as those are generally under municipal responsibility, even though they are within the state highway right of way.

Municipalities seeking sidewalks within the state right of way may obtain a permit from VTrans to construct and maintain those sidewalks. Finally, Vermont has what are known as Class I Town Highways. Class I Town Highways are portions of state-numbered routes upon which municipalities accept general maintenance and operational responsibilities, including the provision of sidewalks and curb ramps. While there is a degree of joint responsibility concerning Class I Town Highways, the towns retain the primary responsibility and jurisdiction over those highways. VTrans does program projects to maintain pavement on Class I Town Highways and curb ramps are addressed within those project limits.

Historically, when VTrans constructed sidewalks and curb ramps as part of a larger transportation project, there was often no clear maintenance agreement between the state and the municipality concerning ongoing maintenance of newly constructed pedestrian facilities. However, the current practice surrounding future maintenance of newly constructed sidewalks within a town or municipality includes the drafting of a maintenance agreement specifically outlining the town's responsibilities. The VTrans Administrative Policy – *Sidewalks, Construction and Maintenance - 6010*, effective on July 6, 2001, requires the identification of future maintenance responsibility for any new sidewalks constructed.

In general, VTrans does not own or maintain any sidewalks, even though there are sidewalks within State Highway Right of Way. Those sidewalks are generally there through either a permit (VT State Statute Title 19 section 1111) or under a maintenance agreement with VTrans. Towns are responsible for the ongoing upkeep and maintenance (including winter maintenance) of sidewalk networks.

Sidewalks or other pedestrian facilities designed and constructed in municipalities throughout Vermont prior to the implementation of VTrans Administrative Policy - 6010 may lack clear maintenance agreements between the local entity and VTrans.

B. Winter Maintenance

For a sidewalk or other pedestrian facility to be accessible, it must be effectively maintained. During the winter season, maintenance includes the removal of snow and ice from pedestrian facilities. As stated in a Federal Highway Administration (FHWA) memo dated September 12, 2006, regarding accessibility: “As part of maintenance operations, public agencies' standards and practices must ensure that the day-to-day operations keep the path of travel open and usable for persons with disabilities, throughout the year. This includes snow and debris removal.” Legal adjudications from various jurisdictions have clearly established the requirement that the removal of snow and clearing of sidewalks within a “reasonable amount of time” must occur. What remains less clear, however, is determining what constitutes a reasonable amount of time in which pedestrian facilities are to be cleared and maintained after a significant snow or ice event. VTrans does not maintain any sidewalks in state highway right of way. Most sidewalks have clear agreements identifying the municipality responsible for maintenance, but some sidewalk segments lack a clear maintenance plan.

C. Locally Managed Projects

VTrans oversees the development of locally-managed projects through its [Municipal Assistance Bureau](#) (MAB). Most of the MAB projects are federally funded through the Transportation Alternatives program and other Surface Transportation Program funding. The majority of projects in the MAB program are those that are managed by a local project sponsor, most typically a municipality, with VTrans staff working alongside them to ensure that all federal requirements are met. A mutually beneficial outcome of cooperative and collaborative project monitoring and oversight ensures that projects designed to provide improved access to pedestrian facilities incorporate all elements of accessible facility planning, design, construction, and future maintenance.

D. Department of Motor Vehicles (DMV)

We did not address the Vermont DMV in this ADA Transition Plan. DMV is addressing its own accessibility issues to deal with any physical barriers and communication barriers. DMV also just published a Visor Card for the deaf and hard of hearing to use when communicating with the Vermont State Police.

E. Public Transit Providers

The VTrans Public Transit Section does not directly operate transportation services. However, it is required by the Federal Transit Administration (FTA) to ensure that recipients and subrecipients of Section 5307, 5310, 5311 and other FTA assistance comply with all federal and state requirements as it pertains to Title VI and ADA. To meet this federal mandate, the Public Transit Section conducts periodic reviews of its grantees. The Public Transit Section requires that service to individuals with disabilities be equivalent to the service provided other individuals with respect to response time, fares, geographic service area, hours and days of service, and capacity. Vehicles and transit facilities are required to be accessible to and usable by individuals with disabilities, including individuals using wheelchairs. Under Title VI, the Public Transit Section has the responsibility to provide oversight of recipients and subrecipients to enforce their compliance with Title VI, to ensure that recipients do not use DOT funds to subsidize discrimination based on race, color, or national origin.

5. Transition Plan Facilities – Inventory of Barriers and Schedule of Improvements

Asset Management

In the new VTrans prioritization process known as VPSP2 (VTrans Project Selection and Prioritization Process), one of the asset categories is “walkways/paths and trails.” Elements of the rubric by which assets are evaluated address accessibility. Specifically, it is addressed in the “mobility and connectivity” criterion and in the “health access” criterion.

VTrans is in the process of developing an asset management information system called VAMIS. There are several VTrans assets that are envisioned to be tracked in this system and accessibility features can be tracked. This would include pedestrian signals, Park and Ride lots, and curb ramps. VAMIS has an implementation period of approximately two years before it is populated and up and running.

Budgeting for Accessibility Improvements

VTrans does not budget or program projects to specifically address accessibility improvements. For the following list of VTrans assets that affect accessibility, those elements that can result in improvements are typically part of a larger project. For example, if a Park and Ride lot is being rehabilitated, the project will include the appropriate number of accessible parking spaces and ensure that there are accessible routes provided to transit shelters. This project will show up in the VTrans budget as a Park and Ride project. It will not be identified as an accessibility improvement even though it may result in better conditions for people with disabilities.

A. Rest Areas/Welcome Centers

VTrans owns the Rest Areas and Welcome Centers in Vermont, and we have a Memorandum of Understanding with the VT Department of Buildings and General Services (BGS) for operations and maintenance. BGS is responsible for the buildings and sidewalks. VTrans maintains paving, lighting, signs, drainage and guardrail.

As part of the original 1995 VTrans ADA Transition Plan, all of the Rest Areas and Welcome Centers in the state were inventoried and assessed through the self-evaluation process and considered in terms of accessible features, programs, and services. Noted deficiencies were identified, a schedule for improvement developed, and the deficiencies identified were corrected.

BGS took the lead on a project to build the Southbound I-91 Hartford Rest Area project in 2012. That project was built to the most current ADA standards for accessibility. Rest Areas and Welcome Centers are monitored regularly and when any accessibility issues come up, an action plan is developed to address them. This happened in 2019 when several individuals tripped at the Williston Rest Area. An assessment was made of the sidewalks near the entrance and a project was put in place to correct this. Accessibility improvements were incorporated into that project.

In 2011, the idea of using Federal funds for preventative maintenance projects at state-owned Rest Areas was first discussed. A proposal to use Federal transportation funding at state-owned Rest Areas was approved by FHWA in October 2013. Federal and state funding was put in the rest area budget to cover eligible preventive maintenance projects. Items that may utilize this funding include sidewalks/walkways and some building elements such as flooring, doors, etc. Aside from the VTrans-funded preventative maintenance projects, VTrans also participates in any new or refurbished Rest Areas that have been identified in the Rest Area program. In addition, BGS has a major maintenance plan that identifies needs and schedules improvements utilizing their state funds.

VTrans, in collaboration BGS, the Agency of Commerce and Community Development (ACCD), and other stakeholders will conduct a study of Vermont’s network of Visitor Centers to develop recommendations for strategic future investments. The study will research, assess and develop a plan for the future of the state’s Visitor Centers. This study is anticipated to begin in 2020 and be completed in 2021.

There is also a scoping study being undertaken to perform an ADA assessment of the Derby Welcome Center to determine what is needed to bring it into compliance. The outcome of the study will determine the next step – rehabilitation or reconstruction. This study is anticipated to be complete in early 2021.

B. Airports

The Vermont Agency of Transportation’s aviation mission is to support, maintain and enhance all state-owned airports. It is worth noting that the Burlington International Airport, where the majority of public flights are serviced, is not a state-owned asset. It is owned and operated by the City of Burlington. The following table summarizes accessibility improvements made or scheduled for the ten state-owned airports.

Airport Name - Location	Accessibility Status	Date Improvements Completed	Comments
Bennington	The main terminal and restrooms are ADA accessible.	2005 - 2006	
Knapp Airport - Berlin	Terminal renovations have been completed as part of a larger runway and taxiway improvement project. Both the terminal and restrooms are ADA accessible.	2011	
Caledonia	The terminal has been completely renovated and is now ADA accessible.	2012	
Franklin County	The main terminal building has received a complete renovation, however, the main door to the terminal has some accessibility issues.	2015	**
Island Pond	No facilities; grass landing strip.		
Middlebury	The terminal has been renovated and is now ADA accessible.	2003	
Morrisville/Stowe	The terminal building and restrooms are fully accessible.		
Newport	A new, 10,000-square-foot terminal building was scheduled for construction beginning in 2014, but that project was delayed. Although a more thorough assessment of the building is needed, there are elements of the restrooms and entrance that don’t fully comply with accessibility standards.		**
Rutland	The terminal and restrooms are accessible and the second floor is serviced by an accessible elevator.		
Springfield	Accessibility improvements have been completed in the terminal building and restrooms.	2005-2006	

** By the end of 2022, a more thorough accessibility assessment will be made of this facility with a goal of developing an approximate cost to address any deficiencies. Once that information is available, a schedule and budget will be developed to address needed improvements.

C. District Offices

The eight VTrans Maintenance District offices were evaluated for accessibility, scheduled for improvements, and updated as indicated in the original VTrans ADA Transition Plan. In the years since, accessibility improvements continue to be made as some district offices have relocated to newer, more accessible, facilities. While these offices are primarily used by VTrans employees, they are occasionally accessed by the public for events like pre-construction meetings and trainings. While it is the case that not all district offices are fully compliant with the ADA, VTrans is committed to making the necessary improvements as previously identified and will continue to ensure that access to its services are made fully available to all.

VTrans plans to complete an updated survey of District facilities accessed by the public by January 1, 2022 and to complete any needed improvements by January 1, 2023.

D. Railroads

The VTrans Rail Program assists in the development of opportunities for the shippers and receivers of rail freight in the state and is also responsible for the Amtrak/Vermont Intercity Passenger Rail partnership provided on the Ethan Allen Express and Vermonter lines, respectfully. For passenger rail service, VTrans is a partner with Amtrak and the municipalities in which Amtrak stops are located.

From an accessibility standpoint, VTrans is directly responsible for very few of the facilities at Amtrak stops. All station platforms are currently low level to accommodate the combined freight/passenger trains. The platforms have a portable lift that the train conductors use to accommodate passengers to and from the train.

Amtrak Vermonter

Station Name	Station	Platform	Parking	Comments
Brattleboro	Town-owned building; Amtrak is working on ADA compliance in 2021.	Low-level platform	Public parking	Not owned by VTrans.
Bellows Falls	Private ADA-compliant station	Low-level platform	Public parking	Not owned by VTrans.
Windsor	Private	Low-level platform	Private/public parking	Not owned by VTrans; (Amtrak is working on a project to bring platform and parking into ADA compliance in 2020.)
White River Jct.	Owned by Vtrans;in the process of becoming ADA compliant.	Low-level platform	State-owned ADA-compliant parking	2020/2021 project is addressing accessibility improvements.
Randolph	None at this stop	Low-level platform	Public parking	Not owned by VTrans.
Montpelier	Private ADA-compliant station	Low-level platform	Private ADA-compliant parking at this location	Not owned by VTrans.

Station Name	Station	Platform	Parking	Comments
Waterbury	Private ADA-compliant station	Low-level platform	Public and private ADA-compliant parking	Not owned by VTrans.
Essex Jct.	Private ADA-compliant station	Low-level platform	Public parking at this location	Not owned by VTrans.
St. Albans	Private ADA-compliant station	Low-level platform	Private ADA-compliant parking	Not owned by VTrans.

VTrans is in the process of expanding the Ethan Allen line north to Burlington. Currently, the only operating stops on the Ethan Allen line are Castleton and Rutland. All of the potential stops are listed in the table below.

Amtrak Ethan Allen Express

Station Name	Station	Platform	Parking	Comments
Castleton	Privately owned; ADA compliant	Low-level platform	Private ADA-compliant parking	Not owned by VTrans.
Rutland	City-owned; ADA compliant	Low-level platform	Public parking	Not owned by VTrans.
Middlebury	No station at this stop	Low-level platform	Parking provided by City	Passenger service expected in 2021.
Vergennes	Owned by VTrans	Low-level platform	Parking provided by VTrans-owned Park and Ride at this site. See Park and Rides for accessibility.	2019/2020 construction project. Fully accessible when complete.
Charlotte	Owned by VTrans	Low-level platform	ADA-compliant parking	No passenger service at this time.
Shelburne	Owned by VTrans	Low-level platform	ADA-compliant parking	No passenger Service at this time.
Burlington	Owned by VTrans	Low-level platform	Public parking only at this location	Passenger service expected in 2021. 2020/2021 project will make platform ADA compliant.

While many of the stations are unstaffed, Amtrak personnel provide assistance to those with disabilities to both board and disembark, upon arrival and departure, at each station along the Vermonter and Ethan Allen Express routes.

E. Central Garage

Central Garage Accessibility improvements identified in the original Transition Plan in 1994 and slated for completion in 1995, have been made at the Central Garage in Berlin. Those improvements included restroom renovations and upgrades with the installation of grab bars, new door closers and hardware, wider door clearances and openings.

F. VTrans Offices

Following a fire in 2018 at the National Life building in Montpelier, where most of VTrans staff were located, a general reassessment was made of space needs for several state agencies. Most of VTrans

central office staff are now located at Barre City Place, which is in the heart of Barre City's downtown, on Main Street. Barre City Place was constructed in 2014, was re-inspected for ADA accessibility in 2020, and is considered to meet all accessibility requirements. Barre City Place is owned by DEW Properties, LLC and leased to the State of Vermont.

The remainder of VTrans central office staff are located at the Dill Building, across from Knapp Airport in Berlin. In October 2012, the VTrans Materials Lab and all related facilities were relocated from the former location along Route 302 in Berlin to a new location at the Dill building. The Dill Building is owned by Metro Development, LLC and leased to the State of Vermont. It was re-inspected for ADA accessibility in 2020 and is considered to meet all accessibility requirements.

VTrans has its own training center (VTTC) which is located on Route 302 in Berlin and is fully ADA compliant. The building was brought up to code when it was renovated after the VTrans Materials Lab flooded in 2011. As a training center, it is accessed by VTrans employees and the general public on a weekly, if not daily, basis.

G. Curb Ramps

The 1995 Transition Plan included a list of 60 sidewalk curb ramps on the state system, a schedule for inspection, cost estimates for project upgrades, and a timeline by which projects were to be completed. The original list of curb ramps identified for needed improvement to become ADA compliant was completed shortly after publication of the 1995 Transition Plan.

As the Agency constructed new curb ramps between 1995 and the present, they were designed to meet the ADA standards in place at the time. An area of accessibility guidance in flux between 1995 and 2001 was the inclusion of the requirement that a detectable feature improve accessibility for those with visual impairments navigating curb ramps. In May 2002, FHWA issued a memorandum clarifying the requirement of truncated domes as the only acceptable detectable warning for installation on curb ramps. The result was that a number of otherwise compliant curb ramps were constructed between 1995 and 2002 without the required truncated domes. As the inventory of curb ramps within the state right of way has been improved and altered over time, those ramps previously constructed without truncated domes have been brought into ADA compliance as required.

In 2005, VTrans utilized its existing video inventory to identify the location of all curb ramps on the state system. In addition to the location, each ramp was analyzed to determine if it contained the required detectable warnings. The reason this particular ADA feature was catalogued was to ensure that the geometric requirements of the ADA were being met and also to identify at what locations the required detectable warnings were not present.

In 2009, VTrans designed and implemented a project, utilizing Federal stimulus funds, to reassess prior upgrades made to all curb ramps on the state system and to ensure that previous improvements complied with ADA design standards. The 2005 inventory was used as a starting point to identify the ramp locations. Field visits to all curb ramp sites ensured comprehensive inventory review and site inspection. Upon site inspection, some sites were removed from the inventory citing prior upgrades, while others were added as visual identification of compliance-related issues, most notably the absence of detectable warnings, was noted. When that project was completed in 2010, all curb ramps on the state system had been identified, scheduled for necessary improvements, and/or were compliant with the current ADA curb ramp regulations.

It is standard practice on all VTrans projects that any new curb ramp installations within the right of way and the limits of the project comply with the most current ADA standards. Paving projects that go beyond simple maintenance are considered alterations within the right of way, and therefore must meet accessibility standards consistent with the court ruling in the Kinney v. Yerusalem case. Based on an analysis of bid quantities of detectable warning surface and sidewalk on paving projects, VTrans installs between 200 - 400 curb ramps a year, bringing them into compliance with accessibility standards.

However, there is not a comprehensive, up-to-date inventory of all curb ramps on the state system and whether they meet ADA standards. One of the identified actions in this update of the Transition Plan is to complete such an inventory by the end of 2021. In addition, a process will be developed so that when new ramps are installed within a state highway right of way by either a developer or municipality, the location of those ramps is added to the inventory. All such sidewalks are installed under a section 1111 highway access permit and the permitting section ensures that new curb ramps comply with PROWAG.

H. Pedestrian Signals

VTrans is responsible for 164 traffic signals across the state. Of those, 79 include pedestrian equipment of some type. VTrans maintains a database of all signals under its jurisdiction. The data indicates the number of signals that include a pedestrian phase (either concurrent or exclusive) and at what locations Accessible Pedestrian Signal (APS) upgrades have been installed. The VTrans Traffic Design section estimates that the cost of upgrading a standard signal system providing pedestrian access to all four corners of an intersection with an improved system, including eight APS pushbuttons, is approximately \$12,000. As new signals are constructed or existing signals are upgraded as part of improvement or alteration projects, APS pushbutton systems are installed.

The VTrans Traffic Signal Engineer estimates that pedestrian features have an approximate life cycle of 10 - 15 years. VTrans constructs two or three new signals a year and new or rehabilitated signals are fully compliant with accessibility requirements. Stand-alone signal projects are implemented by the Highway Safety and Design Section and some signal upgrades are incorporated into pavement management projects.

Additionally, if VTrans receives a request from a municipality to convert an existing pedestrian signal to APS, the Agency works collaboratively with local entities to make the necessary improvements to enhance accessibility.

The pedestrian signal database is updated as new signals go online or as existing signals are upgraded and improved. This database will be a valuable tool to assess progress towards making all signals under VTrans jurisdiction fully accessible to persons with disabilities.

Providing audible and vibro-tactile information at pedestrian pushbuttons is one element of accessibility. PROWAG and the MUTCD contain information about pushbutton locations to ensure they can be reached by those using wheelchairs or other mobility devices. The current database of VTrans pedestrian signals does not include an assessment of these attributes. It is anticipated that in 2020 and 2021, the Traffic Signal Section, in partnership with the Bicycle and Pedestrian Program, will hire a temporary employee(s) to visit and inventory all VTrans pedestrian signals and populate a database of all accessibility features. This database will be an inventory of any barriers to accessibility. Once that information is known, VTrans will be able to budget and schedule projects to address those barriers.

Once the inventory has been completed, an evaluation can be made of how many pedestrian signals require modifications to fully comply with accessibility requirements. This information can be used to develop a schedule to make these changes.

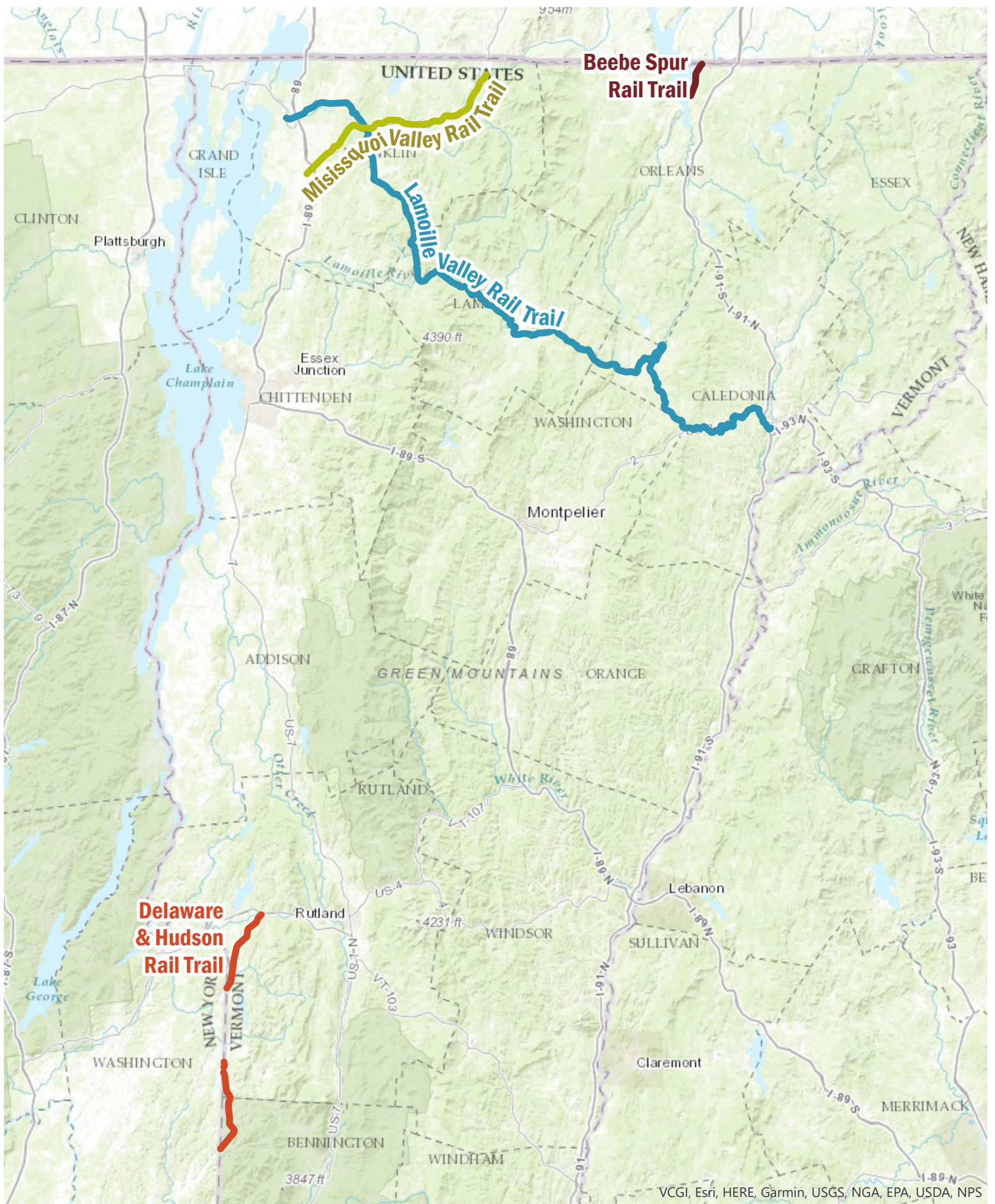
I. Rail Trails

VTrans owns four former rail lines that now function as multi-use trails. The four rail trails are:

Trail Name	From	To	Length	Notes
Missisquoi Valley Rail Trail	St. Albans	Richford	26.3 miles	VTrans maintains; also has a citizen council.
Beebe Spur	Newport	Derby	3.8 miles	VTrans maintains.
Lamoille Valley Rail Trail	Swanton	St. Johnsbury	89 miles	Leased to VAST to develop and maintain.
Delaware and Hudson – North Section	Castleton	Poultney	9.5 miles	VT Dept. of Forests, Parks and Rec. is responsible for regular maintenance.
Delaware and Hudson – South section	Pawlet	Rupert	9.5 miles	VT Dept. of Forests, Parks and Rec. is responsible for regular maintenance.

All of the rail trails have aggregate trail surfaces that comply with the accessibility requirement to be smooth, stable, and slip resistant. Over time, VTrans has programmed and completed projects that have installed detectable warning surfaces at all locations where the trails intersect with roadways.

The Lamoille Valley Rail Trail is not fully built out at this time. As the Vermont Association of Snow Travelers (VAST) and municipalities through which the trail runs develop projects, VTrans is reviewing project plans and ensuring that the design is compliant with accessibility requirements. Therefore, it is anticipated that all rail trails in Vermont are accessible.



Vermont's Rail Trails

J. ADA Accessibility During Construction

An area where VTrans continues to develop and deliver guidance is pedestrian accessibility through construction zones, especially on projects where existing sidewalks become inaccessible prior to, and during, actual construction activity. There is guidance in the *Manual on Uniform Traffic Control Devices (MUTCD)* about pedestrian accessibility during construction. Additionally, FHWA has published some general guidance on this topic. VTrans has a Work Zone Safety & Mobility Guidance Document published in August 2007 that includes a goal of providing a “safe work zone for motorists, pedestrians, bicyclists (the travelling public) and construction personnel.” To meet this goal, it identifies a strategy of developing “site specific traffic control plans, while ensuring compliance with the *Manual on Uniform Traffic Control Devices.*”

VTrans has developed standard construction notes regarding pedestrian access in work zones that are regularly incorporated in project plans and construction specifications. VTrans adopted the *Vermont Bicycle and Pedestrian Work Zone Traffic Control Guide* in July 2018. This guide includes details on how to provide accessible routes for pedestrians when existing sidewalks are impacted by construction.

K. Park-and-Ride Lots

In addition to a variety of maintenance facilities and other properties, VTrans has 32 state-owned and maintained Park-and-Ride facilities. As VTrans has upgraded and expanded these facilities, VTrans has adhered to the existing ADA accessibility regulations and requirements. However, there may be some elements of existing Park-and-Ride facilities that require further improvement to ensure compliance with the newly adopted 2010 Standards.

As facilities are expanded and improved, VTrans will ensure accessibility of the state-owned Park-and-Ride facilities. In 2013, VTrans undertook the following actions:

1. Developed an ADA Compliance Evaluation survey for all of the state-owned and maintained Park-and-Ride Facilities.
2. Conducted site visits to each Park-and-Ride and evaluated using the survey.
3. Using information from the evaluation survey, compiled a list of changes needed at each site.
4. Developed a plan for addressing the ADA compliance issues for each Park-and-Ride facility identified as needing any changes. Some of these changes have already been implemented, and the balance are being addressed based on available funding, time schedules, methods of treatments, priorities, and any ongoing maintenance that is needed.

In the Park-and-Ride compliance table that follows, several Park-and-Rides are planned for reconstruction projects and those have a construction year noted. For all the other ADA improvements identified as short term, there are no projects currently programmed. However, it is anticipated that these needs will be addressed in one of two ways with a completion year between 2023 and 2025. One possibility is that if an existing Park-and-Ride Lot needs to be re-paved, the ADA improvements will be part of the paving project. Another possibility for lots with good pavement is that a statewide project will be developed to address all of the other lots with “short term” improvements identified.

VTRANS PARK - AND - RIDE COMPLIANCE RECOMMENDATIONS (2020)				
	Park & Ride Location	Identified Work Items	Timeline	Comments
1	Barre Town (East)	Line striping (including removal of existing)	Short-term	Mark accessible spaces, aisles, symbols
		Accessible signs/symbols	Short-term	One space
		Light replacement	Short-term	One luminaire
2	Barre Town (South)	Accessible signs/symbols	Short-term	Install 'Van Accessible' sign
3	Berlin (VT62)	Expanded facility in development (2021 Construction)	Short-term	Expanded facility to include new ADA compliant sidewalk, bus shelter, line striping, signage, lighting, EV charging
4	Bradford (1-91)	N/A	N/A	New facility completed in 2016 w/new ADA compliant sidewalk, striping, signage, bus shelter, EV stations, and lighting
5	Bradford (VT-25)	Updated ADA information needed	Short-term	Dirt lot with no lights or formal line striping.
6	Cambridge	Upgraded facility to be constructed 2020	Short-term	Upgrades to facility include new lighting, striping, signage, bus shelter, EV charging
7	Clarendon	Updated ADA information needed		
8	Colchester (Exit 17)	Line striping (including removal of existing)	Short-term	Mark accessible spaces, aisles, symbols
9	Colchester (Exit 16)	N/A	N/A	New facility completed in 2018 with new ADA-compliant sidewalk, striping, signage, bus shelter, EV stations, and lighting
10	Enosburg	Updated ADA information needed		
11	Georgia	Line striping (including removal of existing)	Short-term	Mark accessible spaces, aisles, symbols
		Accessible signs/symbols	Short-term	Two sets of signs, including van accessible
12	Hartland	N/A	N/A	New facility completed in 2014 with new ADA-compliant sidewalk, striping, signage, bus shelter, EV stations, and lighting
13	Manchester	Improved facility in development (2023 Construction)	Short-term	Improved facility to include new ADA-compliant sidewalk, bus shelter, line striping, signage, lighting, EV charging
14	Middlesex	Line striping (including removal of existing)	Short-term	Two spaces
		Accessible signs/symbols	Short-term	Two signs
		Transit system info sign	Short-term	
15	Montpelier	Line striping (including removal of existing)	Short-term	Three spaces
		Accessible signs/symbols	Short-term	Three signs
		Transit system info sign	Short-term	
16	Morrisville-Stowe	Line striping (including removal of existing)	Short-term	Two spaces
		Accessible signs/symbols	Short-term	
		Transit system info sign	Short-term	

PRIORITY LEVEL
Highest
High
Medium
Low

VTRANS PARK - AND - RIDE COMPLIANCE RECOMMENDATIONS (2020)

	Park & Ride Location	Identified Work Items	Timeline	Comments
17	Putney	N/A	N/A	New facility completed in 2016 w/ new ADA compliant sidewalk, striping, signage, bus shelter, EV stations, and lighting
18	Randolph	N/A	N/A	Improved facility completed in 2018
19	Richmond	Updated ADA information needed		
20	Royalton (Exit 3)	New facility to be constructed in 2020	N/A	New facility to include lighting, striping, signage, bus shelter, EV charging
21	Royalton (VT14)	Line striping (including removal of existing)	Short-term	Mark accessible spaces, aisles, symbols
		Accessible signs/symbols	Short-term	One set of signs, including van accessible
22	Sharon	Line striping (including removal of existing)	Short-term	Mark accessible spaces, aisles, symbols
		Accessible signs/symbols	Short-term	One set of signs, including van accessible
23	Springfield	N/A	N/A	Improved facility completed in 2015 with new ADA-compliant sidewalk, striping, signage, bus shelter, EV stations, and lighting
24	Saint Albans	Line striping (including removal of existing)	Short-term	Mark accessible spaces, aisles, symbols
		Accessible signs/symbols	Short-term	
		Transit system info sign	Short-term	
25	Saint Johnsbury	Expanded facility to complete construction in 2020	Short-term	Upgrades to facility include additional parking, new lighting, striping, signage, bus shelter, EV charging
26	Stockbridge	Updated ADA information needed		
27	Thetford	New, expanded facility to be constructed in 2020	short-term	New facility include lighting, striping, signage, bus shelter, EV charging
28	Vergennes-Ferrisburgh	Line striping (including removal of existing)	Short-term	Mark accessible spaces, aisles, symbols
		Accessible signs/symbols	Short-term	
29	Waterbury	Evaluation needed	Short-term	
30	Weathersfield	Transit system info sign	Short-term	
31	West Danville	Line striping (including removal of existing)	Short-term	Mark accessible spaces, aisles, symbols
		Accessible signs/symbols	Short-term	
		Mark and sign 'No Parking' next to shelter	Short-term	
		Relocate transit sign close to shelter	Short-term	
32	Williamstown-Northfield	Expanded facility in development (2022 Construction)	Short-term	Expanded facility to include new ADA-compliant sidewalk, bus shelter, line striping, signage, lighting, EV charging

PRIORITY LEVEL
Highest
High
Medium
Low

L. Communications/VTrans Website Accessibility

The current template used for vtrans.vermont.gov is ADA and Section 508 compliant. However, since there are over 40 VTrans employees who are Website Administrators and have control over how to manage their site, there are sometimes minor accessibility issues with the content. When these issues come up, Administrators work with the Agency of Digital Services to address them.

In the area of general communication, VTrans routinely offers assistance and alternatives when people with a disability request it. This manifests itself in the provision of translators, providing hard copy materials and access to telephonic translation services and other means of communication to make Agency information available.

6. Public Outreach

As part of the ongoing efforts by VTrans to invite public input and help ensure that all of its programs, services, and activities are readily accessible and usable by individuals with disabilities, VTrans has worked closely with disability advocacy groups including the [Vermont Center for Independent Living \(VCIL\)](#), the [Vermont Association of the Deaf \(VTAD\)](#), and the [Vermont Association for the Blind and Visually Impaired \(VABVI\)](#), to seek feedback on this 2020 ADA Transition Plan Update. Effective public outreach efforts are a significant component of the ongoing activities to identify and reduce existing physical barriers to facility access by persons with disabilities.

A copy of the Draft VTrans ADA Transition Plan was posted on the VTrans web page April 29, 2020. Information about the Transition Plan and how to provide comments was issued on social media on April 29, 2020, and a virtual Public Information Meeting was held on May 21, 2020, with meeting reminders posted on May 18 and May 21 and a reminder a few days before the public comment period closed. The public comment period was open for 33 days and VTrans received 39 comments.

A summary of the comments received about the plan update can be found in Appendix A of this document and online at <https://vtrans.vermont.gov/civil-rights/compliance/ada>.

7. ADA Complaint Disposition Process

Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of disability, may file a complaint with the Vermont Agency of Transportation's Office of Civil Rights & Labor Compliance.

All complaints related to disability discrimination should be submitted online through our website: <https://vtrans.vermont.gov/civil-rights/compliance/ada/complaint-procedure>, through the mail, via email, or by telephone to Sue Hackney, ADA Coordinator:

Sue Hackney, ADA Coordinator
VTrans Office of Civil Rights and Labor Compliance
219 North Main Street
Barre, VT 05641

Email: susan.hackney@vermont.gov
Phone: 802.249.9291

Written complaints must be signed by the complainant. (Complaints submitted online through our website require an electronic signature.) Complaints submitted by telephone or e-mail or unsigned written complaints must be followed by a complaint in writing, signed by the complainant or his/her representative within 10 business days of the initial verbal/electronic/unsigned complaint. If the complainant requires assistance to submit a written document, a member of the VTrans Office of Civil Rights will interview the complainant and assist the person in converting verbal complaints to writing. This document must be signed by the complainant or his/her representative. Federal and State laws require that the complaint be filed within 180 days of the alleged incident of discrimination.

Once the complaint has been submitted in writing, VTrans will pursue the following steps in addressing the complaint:

1. The VTrans ADA Coordinator will initiate a Complaint Form.
2. Essential information on the form includes the following:
 - a. Date of the incident that is the subject of the complaint;
 - b. Time of the incident;
 - c. Location of the incident; and
 - d. Circumstances of the incident in as much detail as is available, including a description of the issues and the names and contact information of those individuals perceived as parties in the complaint.
3. The completed form, along with the initial complaint letter and a summary of any other communication, will be submitted to the VTrans Chief of Civil Rights for review. The Chief of Civil Rights will determine the jurisdiction and acceptability of the complaint and any need for additional information. After any additional information is procured, the Chief of Civil Rights will determine whether to accept or reject the complaint.
4. The complainant will be provided with a written notification that VTrans has either accepted or rejected the complaint.
5. A complaint may be rejected for the following reasons:
 - a. More than 180 days passed between the alleged incident and the filing of the initial complaint.
 - b. The allegation does not involve a disability.
 - c. The allegation does not involve VTrans or one of its subrecipients of federal funds.
 - d. The complainant fails to respond to repeated requests for additional information needed to process the complaint.
 - e. The complainant cannot be located after reasonable attempts.
6. An accepted complaint will be assigned a case number and be logged on the VTrans ADA Complaint Log maintained by the VTrans Office of Civil Rights, identifying the complainant's name, date of the incident, and information about the alleged incident.
7. The VTrans ADA Coordinator, assisted by other members of the Office of Civil Rights who are trained in compliance investigations, will initiate an investigation of the complaint and complete a report within 90 days of the acceptance of the complaint. The report shall include a narrative description of the incident, identification of the persons interviewed, findings, and recommendations for disposition.

8. The report will be reviewed by the Chief of the VTrans Office of Civil Rights and referred to the Legal Section of VTrans, if deemed appropriate. The Chief will accept or reject the recommendation for disposition, in consultation with the Legal Officer, and if the individuals involved are found to be in noncompliance with ADA requirements, remedial actions will be determined.
9. The results of the investigation and the Chief's determination will be mailed to the complainant. Notice shall include information regarding appeal rights of the complainant and instructions for initiating such an appeal. Notice of appeals are as follows:
 - a. VTrans will reconsider the determination if new facts come to light.
 - b. If the complainant is dissatisfied with the determination and/or resolution set forth by VTrans, the same complaint may be submitted to the appropriate Federal agency listed below:

Federal Transit Administration (FTA)
Office of Civil Rights
1200 New Jersey, S.E. 5th Floor
TRC East Building
Washington, DC 20590
Phone: 202.366.4043

Federal Highway Administration (FHWA)
Vermont Division
87 State Street, Suite 216
Montpelier, VT 05602
802.828.4423

10. A copy of the complaint and VTrans' investigation report, letter of finding, and remedial action plan will be submitted to FTA or FHWA within 120 days of the initial receipt of the complaint.

APPENDICES

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APPENDIX A - SUMMARY OF PUBLIC COMMENTS

ADA Transition Plan Update 2020
Summary of Public Involvement Comments

CATEGORY	COMMENT	BY WHOM	VTRANS RESPONSE
SIDEWALKS, CROSSWALKS & PEDESTRIAN SIGNALS	When you inventory all signals, can you evaluate which ones can be set up with motion sensors?	Peter Johnke	We are not sure if VTrans has looked into that type of technology.
	Audio beeps at crosswalks vs. timers: What is the requirement?	Nate Bezio	If the pedestrian signal is in the scope of a project, we install accessible pushbuttons, including the locator tone. Some are the responsibility of the municipality.
	Auditory signal not helpful for deaf/hard of hearing. Add a visual?	Missy Boothroyd	Other features are visual, like "Walk/Don't Walk" indication; or light that shows button has been pushed.
	A blind person cannot tell which light is being signaled.	Laura Siegel	The face of the pushbutton is to be parallel with the crosswalk to which it applies; VTrans has conducted training with contractors and resident engineers (construction oversight) to ensure understanding.
	The crosswalk by Burger King (on Route 302) is confusing.	Rosemary Miller	This is a design issue that we need to look into.
	Could you include a list of pedestrian signals and who is responsible for each (VTrans vs. Municipality) in the Transition Plan?	Nate Bezio	Yes, we can do this and will add it to the plan as an appendix.
	Cars do not always stop at crosswalks.	Missy Boothroyd	This is an enforcement issue. VTrans can, however, incorporate the needs of people with disabilities into our general pedestrian and traffic safety messages.
	How long is the duration of the flashing lights at a crosswalk? Sometimes cars don't stop. Could there be a pedestrian warning to not start crossing until cars are stopped?	Nate Bezio	The duration is based on a typical (lower end of) walking speed. We are conducting a research project next year to evaluate the effectiveness of the flashing lights.
	Go back to the old system that automatically tells pedestrians to "walk"/"don't walk" when the traffic light changes (i.e. without having to push a button.)	J.D.	Our standard practice is to include pedestrian pushbuttons when a pedestrian signal is provided.
	Add crosswalks/pedestrian signals to additional intersections.	Philip Picotte	Pedestrian features are considered with all VTrans projects and incorporated when deemed appropriate.
	Specifically address shoulder width for motorized wheelchair users.	Philip Picotte	VTrans provides paved shoulders as conditions allow on most projects. While not specifically intended for accessibility, they do provide space where people can walk in the absence of sidewalks.
	At the four-way light in Montpelier, there is only one "no right turn" sign (the arrow with the slash down the middle of it.) It would be helpful to have that signal on both sides of street so pedestrians can see it from any direction.	Rosemary Miller	This signal is under the jurisdiction of the City of Montpelier.

CATEGORY	COMMENT	BY WHOM	VTRANS RESPONSE
SIDEWALKS, CROSSWALKS & PEDESTRIAN SIGNALS	Ensure pedestrians have sufficient time to cross multi-lane roads; critical for older Vermonters, those who use assistive devices, and families.	Philip Picotte	VTrans follows the MUTCD regarding timing of pedestrian signals. Specific intersections can be evaluated to provide additional time if it is needed.
	The proposed Plan identifies updating an inventory of curb ramps and pedestrian signals on the state system, which seems that it does not include facilities on Class I highways. Suggest that VTrans work with municipalities at the time of inventory for participation to include any curb ramps and pedestrian signals located on Class I Town highways.	Bryan Davis	Our inventory does not include Class I Town Highways. Those are under local jurisdiction for maintenance and compliance.
WINTER MAINTENANCE (Addressed on Page 6 of the Transition Plan Update)	One side of the street is open (plowed); the other side is not.	Rosemary Miller	VTrans does not plow sidewalks and, typically, the municipality should be your first point of contact with this issue.
	Snow on curb ramps? There is confusion about responsibility of VTrans vs. Municipalities.	Nate Bezio	We will make our Maintenance District Managers aware of the issue so they may address it with the plow drivers in their district.
	Who has responsibility for snow removal of bus shelters at Park & Rides?	Nate Bezio	VTrans is responsible for this. If there is a specific instance where this is a problem, contact VTrans ADA coordinator, who will then contact the appropriate VTrans maintenance personnel.
	Sidewalks are not always plowed close enough to the button to reach from a wheelchair.	Rosemary Miller	We need to do a more detailed inventory of all the pedestrian crossings in VT and ensure that the button is in the right location. Winter maintenance of sidewalks is a municipal responsibility and we will work with Municipalities to make them aware of this concern.
	What does VTrans have responsibility for plowing - other than roads?	Lori Valburn	VTrans is responsible for plowing at Information Centers/Rest Areas and Park-and-Rides.
	Coordination between municipal and state winter maintenance is essential. What remedy is there for municipalities who don't adequately maintain sidewalks in the winter?"	Philip Picotte	VTrans will continue to educate municipalities about their winter maintenance responsibilities and the importance to people with disabilities.
	My local town plows the sidewalk, but the plow is not as wide as the sidewalk, leaving a barrier of snow. I cannot access the sidewalk in this situation and have to walk down the side of the street, putting myself at risk.	Helena Carleton	VTrans does not plow sidewalks and, typically, the municipality should be your first point of contact with this issue.
PUBLIC TRANSIT	I did not see anything in the Transition Plan about public transit vehicles. Maybe that is not required on this plan?	Randy Schoonmaker	The ADA Transition Plan addresses assets over which VTrans has Responsibility. While VTrans is a conduit for public transit funding that goes to the transit providers, VTrans does not operate any public transit. We will add a section in the updated ADA Transition Plan to explain this.

CATEGORY	COMMENT	BY WHOM	VTRANS RESPONSE
PUBLIC TRANSIT	The grievance procedure of GMTA is confusing. People think you are supposed to go to GMTA, but it never gets acted upon. We need a written plan directly handed to us that states where to go and whom to go to other than those who are the provider of service in our area.	Marcy Ryan	This is outside the scope of the ADA Transition Plan Update, but we will reach out to our Public Transit section and GMTA to make them aware of this matter.
	We need backup transportation other than our main one such as GMTA/SSTA, etc. They are available here, but SSTA will not use them nor will the state allow for more than one provider per county which does not work.	Marcy Ryan	This is outside the scope of the ADA Transition Plan Update, but we will reach out to our Public Transit section and GMTA to make them aware of this concern.
PARK -AND-RIDES	What is the best approach to remedy the issue of snow piled up in an accessible parking space?	Peter Johnke	Contact Sue Hackney, 802.249.9291 - susan.hackney@vermont.gov or Jon Kaplan, 802.498.4742 - jon.kaplan@vermont.gov for help. We will reach out to the appropriate Maintenance District to make them aware.
	Would it make sense to put up signs at the Park-and-Rides to provide information on who to call if there is an issue?	Peter Johnke	We will look into this.
SIGNAGE	Is it possible to create a sign that says, "Deaf and Blind People Walk Here"? (Yellow diamond-shaped sign)	Laura Siegel	This is outside the scope of the ADA Transition Plan. Sign design must follow the MUTCD. We can work with VCIL and VT Highway Safety Alliance to do some posts on Agency social media, etc. to make those points.
	Add "Wheelchair, " or "stroller"?	Missy Boothroyd	
	Reword sign to say "Persons with Disabilities"	Peter Johnke	
	The concern is if you cannot see the disability. There is also concern with electric vehicles since they are so quiet.	Laura Seigel	
DMV	What does DMV have for a communication tool for deaf people?	Peter Johnke	We did not address the Vermont DMV in this ADA Transition Plan. DMV is addressing its own accessibility issues to deal with any physical barriers and communication barriers. DMV also just published a Visor Card for the deaf and hard of hearing to use when communicating with the Vermont State Police.
ROLE OF BUILDINGS, GROUNDS, and SERVICES (BGS)	Who should someone contact if they are having an accessibility issue at DMV ?	Lori Valburn	It depends which type of accessibility issue. BGS oversees accessibility issues pertaining to access of buildings. DMV locations are BGS-owned buildings and VTrans are tenants in that space. Larger office buildings (Barre City Place and the Dill Building) are leased so compliance issues go through BGS who, in turn, works with the landlords. VTrans is responsible for access to its programs.

CATEGORY	COMMENT	BY WHOM	VTRANS RESPONSE
USE OF FACE MASKS	Safety measure vs. a conflict with ADA if someone has trouble putting on a mask or has a medical issue.	Nate Bezio	This is outside the scope of the ADA Transition Plan.
	Bus drivers need to be aware of deaf and hard of hearing issues with face masks since people cannot lipread if one is worn. White board/marker is a good solution – or get a Video Remote Interpreter (VRI).	Annette	This is outside the scope of the ADA Transition Plan, but we will reach out to our Public Transit section and GMTA to voice your concerns.
HANDICAPPED PARKING SPACES	Unauthorized cars are parked in or obstructing handicapped parking spaces.	Helena Carleton	This is an enforcement issue, primarily via municipal police or contracted services.
BUDGET	Recommend a budget for solving problem areas that people with disabilities identify as dangerous or inaccessible - consider funding for areas that may fall under municipal responsibility if these areas are not being addressed due to lack of local funds. ADA plan states, "VTrans does not budget or program projects to specifically address accessibility improvements. "	Kim Brittenham	Vtrans does have grant programs for pedestrian facilities that could address accessibility projects for municipalities, but they are not exclusively for accessibility projects.
STAFF TRAINING	What is training plan for meeting current and future needs of new staff and staying updated of any new guidelines, i.e. anticipating PROWAG being adopted?	Kim Brittenham	VTrans is committed to ongoing training of staff on accessibility topics.
VTRANS EMPLOYEE DEMOGRAPHIC	What is the current demographic of employees at VTrans? Number of deaf, blind, have developmental disabilities, and use wheelchairs? What is your plan to diversify the workforce and support the accommodation process for employees?	Kim Brittenham	This is outside the scope of the ADA Transition Plan, as it is limited in its scope. VTrans supports the employment of people with disabilities and works with the State of VT Reasonable Accommodations Committee as necessary. VTrans has a number of procedures in place that are specific to diversification of our workforce.
PUBLIC MEETING ANNOUNCEMENT	Will the public meeting be announced in a variety of places such as radio and list serves for those who cannot access a website? Can a person using a screen reader use this form and know how to find the forthcoming link?	Kim Brittenham	In addition to our regular VTrans social media notices, Peter Johnke included the website link from VCIL's page and sent it directly to their contacts. We also shared a short blurb and link with Holly Hayden to post to VT Local Roads to ensure that the notice got out to municipalities and also to the Rural Planning Commissions to share with their towns. Yes, the form and link used were compatible with using a screen reader.
PEDESTRIAN ACCESS DURING CONSTRUCTION	When the sidewalk outside my apartment was being re-laid, the construction crew put a single 2 x 4 across the wet cement and expected me to walk on it like a balance beam. I am unable due to a disability and was effectively trapped inside my apartment for four days because they were unwilling to do something different.	Helena Carleton	This particular location is on a road under municipal jurisdiction. VTrans has developed technical guidance for proper implementation of work zones to maintain pedestrian accessibility.

APPENDIX B - ADA COMPLAINT FORM

Discrimination based on Disability



Office of Civil Rights and Labor Compliance

Vermont Agency of Transportation

Section I

Name: _____

Address: _____

Telephone (Cell/Home): _____ Telephone (Work): _____

Email: _____

Accessible Format Requirements? Large Print _____ Audio Tape _____ TDD _____

Other (Explain) _____

Section II

Are you filing this complaint on your own behalf? Yes* _____ No _____ **If you answered "Yes" to this question, go to Section III. If you answered "No," please provide the following information:*

Name of person for whom you are filing: _____ Relationship: _____

Please explain why you are filing this complaint for a third party: _____

If you are filing on behalf of someone else, have you have obtained that person's permission to file this complaint? Yes _____ No _____

Section III

I believe the discrimination I experienced was based on my disability.

Date of Alleged Discrimination: _____ Time of Alleged Discrimination: _____

Explain as clearly as possible what happened and why you believe you were discriminated against. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If you need more space, please attach a separate sheet of paper.

Section IV

Have you previously filed an ADA complaint with this Agency? Yes _____ No _____

Section V

Have you filed this complaint with any other Federal, State, or Local Agency or with any Federal or State court?
Yes* _____ No _____

**If you answered "Yes," check all that apply:*

Federal Agency _____ Federal Court _____ State Agency _____ State Court _____ Local Agency _____

Please provide information for the contact person at the agency/court where you filed the complaint.

Name: _____ Title: _____

Agency: _____ Agency Telephone: _____

Agency Address: _____

Section VI

Name of Agency complaint is against: _____

Contact person: _____ Title: _____

Telephone number: _____

You may attach any written materials or other information that you think is relevant to your complaint.

Signature

Date

Please either submit this form in person to the address below, mail it, or send it via email:

Sue Hackney
ADA Coordinator, Office of Civil Rights and Labor Compliance
Vermont Agency of Transportation
219 North Main Street
Barre, VT 05641

Phone: 802.249.9291
Email: susan.hackney@vermont.gov

APPENDIX C – LIST OF ACRONYMS

504:	Section 504 of the Rehabilitation Act of 1973 is a national law that protects qualified individuals from discrimination based on their disability. The nondiscrimination requirements of the law apply to employers and organizations that receive financial assistance from any Federal department or agency. Section 504 forbids organizations and employers from excluding or denying individuals with disabilities an equal opportunity to receive program benefits and services. It defines the rights of individuals with disabilities to participate in, and have access to, program benefits and services.
ADA:	Americans with Disabilities Act
ADAAG:	Americans with Disabilities Act Accessibility Guidelines
APS:	Accessible Pedestrian Signal
ANSI:	American National Standards Institute
AASHTO:	American Association of State Highway and Transportation Officials
DEM:	Design and Engineering Manual
DOJ:	Department of Justice
DPW:	Department of Public Works
FHWA:	Federal Highway Administration
GIS:	Geographic Information System
GPS:	Global Positioning System
MEF:	Maximum Extent Feasible
MUTCD:	Manual of Uniform Traffic Control Devices for Streets and Highways
PAR:	Pedestrian Access Route
PPSA:	Policy, Planning and Sustainability Administration
PSRA:	Public Space Regulatory Administration
QA:	Quality Assurance
QC:	Quality Control
QA/QC:	Quality Assurance/Quality Control
PROWAG:	Public Rights-of-Way Accessibility Guidelines
ROW:	Right-of-Way
RPC:	Regional Planning Commission
SHA:	State Highway Administration
TOA:	Transportation Operations Administration

TCP: Traffic Control Plan
UFA: Urban Forestry Administration
UFAS: Uniform Federal Accessibility Standards
VTrans: Vermont Agency of Transportation

Traffic Signals Maintained by VTrans that Include Pedestrian Signals

TOWN	VTRANS SIGNAL INVENTORY NUMBER	TYPE OF PEDESTRIAN PHASE*	INTERSECTION
BARRE CITY	MS612	Concurrent	VT 62 & BERLIN ST
BARRE TOWN	MS615	Concurrent	VT 14 & VT 63
BENNINGTON	MS101	Concurrent	VT 67A & VT 279 WB RAMPS
BENNINGTON	MS101A	Concurrent	VT 67A & VT 279 EB RAMPS
BENNINGTON	MS104	Exclusive	VT 7A & ORCHARD RD
BENNINGTON	MS105	Concurrent	VT 7A & BENMONT AVE
BENNINGTON	MS106	Exclusive	US 7 & KOSHER DR
BERLIN	MS605	Concurrent	US 302 & MCDONALD'S
BERLIN	MS607	Exclusive	VT 62 & PAINE TPKE
CASTLETON	MS318	Exclusive	VT 4A & VT 30
COLCHESTER	MS529	Exclusive	US 7 & SO PARK DR
COLCHESTER	MS538	Exclusive	VT 15 & ST MIKE'S WEST
COLCHESTER	MS539	Exclusive	VT 15 & LIME KILN RD
COLCHESTER	MS540	Concurrent	VT 15 & ST MIKE'S EAST
COLCHESTER	MS591	Concurrent	US 7 & CREEK FARM RD
DANVILLE	MS714	Exclusive	US 2 & PEACHAM RD
E. MONTPELIER	MS647	Exclusive	US 2 & VT 14 SOUTH
E. MONTPELIER	MS648	Concurrent	US 2 & VT 14 NORTH
ESSEX TOWN	MS550	Concurrent	VT 15 & ETHAN ALLEN AVE
ESSEX TOWN	MS551	Exclusive	VT 15 & SUSIE WILSON RD
ESSEX TOWN	MS555	Exclusive	VT 15 & BILLY BUTLER DR
ESSEX TOWN	MS556	Exclusive	VT 15 & ESSEX WAY
ESSEX TOWN	MS557	Exclusive	VT 15 & PRICE CHOPPER
ESSEX TOWN	MS558	Exclusive	VT 15 & VT 128
ESSEX TOWN	MS559	Exclusive	VT 15 & OLD STAGE RD
HARTFORD	MS404	Exclusive	US 5 & US 4 & VT 14
HARTFORD	MS405	Exclusive	US 4 & BRIDGE ST/PINE ST
HARTFORD	MS406	Exclusive	US 5 & WORCESTER AVE
HARTFORD	MS406A	Exclusive	HIGHLAND AVE & HIGH SCHOOL
HINESBURG	MS574	Exclusive	VT 116 & CVU RD
HINESBURG	MS575	Exclusive	VT 116 & CHARLOTTE RD
HINESBURG	MS585	Exclusive	VT 116 & COMMERCE ST
MIDDLEBURY	MS500	Exclusive	US 7 & MIDDLE RD
MIDDLEBURY	MS501	Exclusive	US 7 & SHOPPING CTR
MILTON	MS800	Exclusive	US 7 & CENTRE DR
MILTON	MS801	Exclusive	US 7 & MILTON SQ
MORRISTOWN	MS621	Exclusive	VT 100 ATR & BRIDGE ST
MORRISTOWN	MS623	Exclusive	VT 100 & NORTHGATE PLAZA
NORWICH	MS408	Concurrent	VT 10A & RIVER RD
NORWICH	MS411	Concurrent	VT 10A & I-91 EXIT 13 SB RAMPS

Traffic Signals Maintained by VTrans that Include Pedestrian Signals

TOWN	VTRANS SIGNAL INVENTORY NUMBER	TYPE OF PEDESTRIAN PHASE*	INTERSECTION
RICHMOND	MS576	Concurrent	US 2 & BRIDGE ST
RUTLAND TOWN	MS307	Concurrent	US 7 & SEWARD RD
RUTLAND TOWN	MS308	Concurrent	US 7 & COLD RIVER RD
SHELBURNE	MS505	Concurrent	US 7 & BOSTWICK RD
SHELBURNE	MS506	Concurrent	US 7 & HARBOR RD
SHELBURNE	MS507	Concurrent	US 7 & LONGMEADOW RD
SHELBURNE	MS508	Concurrent	US 7 & BAY RD
SHELBURNE	MS509	Concurrent	US 7 & PINE HAVEN SHORES
SHELBURNE	MS511	Concurrent	US 7 & WEBSTER RD
SHELBURNE	MS512	Concurrent	US 7 & HULLCREST RD
SHELBURNE	MS513	Concurrent	US 7 & MARTINDALE RD
SO. BURLINGTON	MS514	Concurrent	US 7 & HARBORVIEW RD
SO. BURLINGTON	MS515	Concurrent	US 7 & ALLEN RD
SO. BURLINGTON	MS516	Concurrent	US 7 & BARTLETT BAY RD
SO. BURLINGTON	MS517	Concurrent	US 7 & IDX DR
SO. BURLINGTON	MS518	Concurrent	US 7 & MCINTOSH AVE
SO. BURLINGTON	MS519	Concurrent	US 7 & BALDWIN AVE
SO. BURLINGTON	MS520	Concurrent	US 7 & BREWER PKWY
SO. BURLINGTON	MS521	Exclusive	US 7 & QUEEN CITY PKWY
SO. BURLINGTON	MS522	Concurrent	US 7 & SWIFT ST
SO. BURLINGTON	MS523	Exclusive	VT 116 & KENNEDY DR
SO. BURLINGTON	MS524	Concurrent	US 7 & LAUREL HILL RD
SWANTON	MS820	Concurrent	VT 78 & ROBIN HOOD DR
WALLINGFORD	MS301	Exclusive	US 7 & VT 140
WATERBURY	MS633	Exclusive	US 2 & STOWE ST
WATERBURY	MS635	Exclusive	US 2 & PARK ROW
WEATHERSFIELD	MS210	Exclusive	US 5 & VT 131
WILLISTON	MS565	Concurrent	US 2 & HARVEST LANE
WILLISTON	MS567	Concurrent	US 2 & BROWNELL RD
WILLISTON	MS568	Exclusive	US 2 & VT 2A
WILLISTON	MS569	Exclusive	VT 2A & INDUSTRIAL AVE
WILLISTON	MS572	Exclusive	VT 2A & MARSHALL AVE
WILLISTON	MS573	Concurrent	VT 2A & CONNER WAY
WILLISTON	MS577	Concurrent	US 2 & SHAWS
WILLISTON	MS578	Concurrent	US 2 & SIMONS
WILLISTON	MS579	Concurrent	VT 2A & ZEPHYR RD
WILLISTON	MS581	Concurrent	US 2 & TALCOTT RD
WILMINGTON	MS118	Exclusive	VT 9 & VT 100
WINOOSKI	MS527	Concurrent	VT 15 & I-89 EXIT 15 SB RAMP

* EXCLUSIVE: When all traffic at an intersection is stopped, the pedestrian phase is on and pedestrians can cross in any direction.

* CONCURRENT: When the pedestrian phase comes on for a crossing at the same time as parallel traffic has a green light.