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Montana State Capitol Exterior ADA Transition Plan

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Created for:



General Services Division

Created by:



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1.0 INTRODUCTION

The Montana Department of Administration (DOA) General Services Division (GSD) Americans with Disabilities Act (ADA) transition plan is intended to direct the division's efforts to provide accessible facilities on the Montana State Capitol campus. The purpose of the plan is to provide guidance for removal of accessibility barriers. The plan provides an overview of GSD's ADA program, outlines GSD's mission and ADA policy, and identifies methods to assist GSD in complying with ADA regulations. The plan is intended to be a living document to reflect the current GSD ADA program and compliance status. Attachments to the plan will be updated annually to outline accomplishments to date and future actions necessary to enable ADA compliance.

1.1 GSD Assets

GSD is one of multiple departments within DOA. This plan applies specifically to facilities owned and/or operated and maintained by GSD, and incorporates applicable DOA ADA policies and practices by reference.

Figure 1 illustrates the boundary of the State Capitol campus. Campus buildings under GSD jurisdiction are labeled according to Table 1.









Label	Building Address	Building Name
1	2 Carson Street	Executive Residence
2	1401 East Lockey Avenue	Cogswell Building
3	1315 East Lockey Avenue	Walt Sullivan Building
4	1301 East Lockey Avenue	Old Board of Health Building
5	111 North Sanders Street	Dept. of Public Health & Human Services Building
6	125 North Roberts Street	Mitchell Building
7	1310 East Lockey Avenue	Old Livestock Building
8	118 North Roberts Street	Capitol Annex Building
9	120 North Roberts Street	Boiler Plant Building
10	1301 East Sixth Avenue	State Capitol Building
11	225 North Roberts Street	Montana Historical Society
12	215 North Sanders Street	Joseph P. Mazurek Building
13	1520 East Sixth Avenue	Metcalf Building
14	1500 East Sixth Avenue	Teachers' Retirement Building
15	1420 East Sixth Avenue	Fish Wildlife & Parks Headquarters
16	302 North Roberts Street	Scott Hart Building
17	1236 East Sixth Avenue	Unnamed
18	1218 East Sixth Avenue	Diane Building
19	326 Washington Drive	Unnamed
20	1225 Eighth Avenue	Unnamed
21	1219 Eighth Avenue	Stone House
22	1209 Eighth Avenue	Unnamed
23	1205 Eighth Avenue	Unnamed
24	1410 1/2 Eighth Avenue	Unnamed
25	1404 Eighth Avenue	Unnamed
26	1400 Eighth Avenue	Unnamed
27	425 North Roberts Street	Unnamed
28	1424 Ninth Avenue	Unnamed
29	1300 Eleventh Avenue	Unnamed
30	1227 Eleventh Avenue	Unnamed
31	1201 Eleventh Avenue	Unnamed

Table 1 GSD Capitol Campus Buildings

GSD also owns and maintains several satellite buildings outside the immediate proximity but within a 10-mile radius of the Capitol campus. These are listed below in Table 2.

Label	Building Address	Building Name
32	1400 Carter Drive	Commodities Warehouse
33	2800 Airport Road	DNRC Hangar
34	920 Front Street	Old Liquor Warehouse
35	Unknown	Old State Fund - #5 LCG
36	Unknown	Old State Fund Parking Structure
37	304 N Ewing Street	Original Governors' Mansion
38	1320 Bozeman Street	Records Management
39	490 18 th Street	SMDC

Table 2 GSD Satellite Buildings

Buildings owned, operated, and maintained by GSD typically house state government offices, serve a variety of customers, and provide multiple programs and services. Members of the public regularly require access to GSD buildings during hours of business.

GSD has an unwritten agreement with the City of Helena regarding jurisdiction and maintenance of right-of-way features within the Capitol campus. The City is responsible for maintaining roadways with the exception of Lockey Avenue which has been abandoned by the City. The State is responsible for maintaining sidewalks and curb ramps within the Capitol campus.

1.2 Regulatory Framework

1.2.1 Montana Human Rights Act and Governmental Code of Fair Practices

Title 49 of the Montana Code Annotated (MCA) outlines basic civil rights afforded to the public in Montana, including the right to be free from discrimination because of physical or mental disability. This includes the right to full enjoyment of any place of public resort, accommodation, assemblage, or amusement.

1.2.2 Section 504 of the Rehabilitation Act of 1973

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

1.2.3 Title II of the Americans with Disabilities Act (ADA) of 1990

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

1.2.4 ADA Implementing Regulations

The Code of Federal Regulations (CFR) outlines regulations implementing Title II of the ADA, which apply to GSD as a department of Montana State government. Table 3 summarizes relevant GSD responsibilities under Title II of the ADA as implemented by the United States Department of Justice (DOJ).



Table 3 Summary of GSD Responsibilities under Title II of the ADA

Implementing	Posponsibilitios
Regulation	Responsibilities
	Self-Evaluation
	• Evaluate current services, policies, and practices and make any necessary modifications
	to meet ADA requirements.
28 CFR 35.105	 Provide an opportunity to interested persons, including individuals with disabilities or organizations corresponding individuals with disabilities, to participate in the colf.
	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.
	Notice
28 CFR 35.106	• Make ADA information available to the public regarding applicability to GSD services,
	programs, and activities.
	Responsible Employee/Grievance Procedures
	 Designate a responsible employee to coordinate ADA efforts; provide the ADA
28 CFR 35.107	 coordinator's name, office address, and telephone number. Adopt and publish grievance procedures providing for prompt and equitable resolution of
	 Adopt and publish grievance procedures providing for prompt and equitable resolution of complaints.
	General Prohibitions Against Discrimination
28 CFR 35.130;	 Do not exclude disabled persons from participation in or deny benefits of GSD services,
28 CFR 35.149	programs, or activities.
	Do not discriminate on the basis of disability.
	Maintenance
28 CFR 35.133	 Maintain facilities and equipment required to be accessible to persons with disabilities in
	operable working condition.
	 Existing Facilities Operate each service, program, or activity in a manner accessible to and usable by
	individuals with disabilities.
28 CFR 35.150	 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.
	New Construction and Alterations
28 CFR 35.151	 Design, construct, and alter public facilities in a manner readily accessible to and usable by individuals with disabilities, unless structurally impracticable.
20 CFR 33.131	 Provide curb ramps or other sloped areas at any intersection having curbs or other
	barriers to entry from a street level pedestrian walkway.
	Communications/Telecommunications
28 CFR 35.160;	Ensure effective communications with disabled persons.
28 CFR 35.161	Provide appropriate auxiliary aids and services to afford disabled individuals an equal
	opportunity to participate in and enjoy the benefits of GSD services, programs, and
	activities.
	Information and Signage
20 CED 25 162	 Provide information about the existence and location of accessible services, activities, and facilities
28 CFR 35.163	 and facilities. Provide signage at all inaccessible building entrances directing users to an accessible
	 Provide signage at all inaccessible building entrances directing users to an accessible entrance that is denoted with the international symbol for accessibility.
Noto: Additional roc	sponsibilities detailed in 28 CFR Section 35 (e.g., related to employment discrimination) are

Note: Additional responsibilities detailed in 28 CFR Section 35 (e.g., related to employment discrimination) are not discussed in the GSD transition plan.



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

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

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

As part of the transition plan, public entities responsible for streets, roads, or walkways must include a schedule for providing curb ramps or other sloped areas where pedestrian walks cross curbs, giving priority to walkways serving state and local government offices and facilities, transportation, places of public accommodation, and employers, followed by walkways serving other areas (23 CFR 35.150(d)(2)).

The GSD transition plan addresses plan requirements relating to exterior physical assets, including rights-of-way owned and maintained by GSD. Right-of-way features include elements such as curb ramps, sidewalks, crosswalks, and accessible parking spaces. In addition to minimum requirements, the GSD transition plan addresses other elements outlined in Title II of the ADA related to administration, communications, and maintenance. The GSD transition plan does not address interior physical assets including features located within buildings.

Public entities must provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the development of the transition plan by submitting comments. A copy of the transition plan must be made available for public inspection (28 CFR 35.150(d)(1)). Public participation and document availability are discussed in more detail in Chapter 5.0.

1.3 ADA Policy Statement and GSD Mission

As outlined in 49-4-202 MCA, it is the policy of the state to encourage and enable the blind, the visually impaired, the deaf, and the otherwise physically disabled to participate fully in the social and economic life of the state. DOA is committed to providing programs, services, and activities in accordance with the Americans with Disabilities Act, the Americans with Disabilities Amendments Act, Montana Human Rights Act, and the Governmental Code of Fair Practices.

The GSD mission is to foster exceptional customer service through sustainable practices, by means of effective change management and collaborative relationships. GSD's skillfully diverse staff provides professional and responsive services to government agencies, and the public, while maximizing effectiveness and minimizing costs. One of GSD's goals is to provide customer service that stresses collaborative communication, and stakeholder focused operations.



In fulfilling its mission, goals, and the state ADA policy, GSD recognizes the importance of providing equitable access to all members of the public. Accessible rights-of-way on the Montana State Capitol campus provide critical access to government services and facilitate independence and self-sufficiency, quality of life, participation in the work force, and meaningful social and economic contributions to society. The GSD transition plan is an important step in helping GSD move toward eliminating barriers and providing equitable opportunities for disabled individuals to use state programs, rights-of-way, and building facilities.

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

2.0 ADMINISTRATIVE REQUIREMENTS

2.1 ADA Coordinator

ADA implementing regulations require public entities to designate at least one employee to coordinate efforts to comply with and carry out ADA responsibilities.

GSD's ADA coordinator is responsible for guiding GSD's program to ensure people with disabilities have equitable opportunities to access government facilities and services within the State Capitol campus. The GSD ADA coordinator oversees and guides implementation of this plan to provide accessible public rights-of-way and facilities. The coordinator is a department-wide resource for ADA policies and procedures in support of the plan. Other responsibilities of the coordinator include responding to ADA inquiries and requests for accessible materials or auxiliary aids and services. Contact information and role descriptions for the GSD ADA coordinators are provided on the GSD website.

GSD welcomes feedback from individuals and organizations representing the disability community. GSD strives to consider all comments to assure the disability community is accurately represented in GSD's ADA program.

2.2 Public Notice

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

2.3 Grievance Procedure

Public entities employing at least 50 people are required to adopt and publish grievance procedures providing prompt and equitable resolution of complaints. GSD's grievance procedure and form are located on its ADA website. The grievance procedure provides a mechanism to document and track complaints. GSD considers all public feedback and inquiries and provides an appropriate response to each comment.



2.4 Communications

Government agencies must communicate and interact effectively with the public. DOA generally provides requested auxiliary aids and services to promote equally effective communication to qualified individuals with disabilities who wish to participate in programs, services, and activities offered by the department. Appropriate auxiliary aids and services may include, but are not limited to, qualified sign language interpreters, amplified hearing devices, or other methods to promote effective communication. The department will provide alternative formats of written communications upon request (e.g., Braille, electronic, audio).

The department does not place surcharges on individuals with disabilities to offset the cost of providing auxiliary aids, services, or reasonable modifications. For example, the department will not charge participants for the services of an interpreter when the participant is attending a program, service, or activity offered by the department.

3.0 EXTERIOR PHYSICAL ASSETS

Under Title II of the ADA, GSD must assure all of its physical assets are ADA compliant, including existing and newly-constructed features. GSD's ADA-related physical assets are divided into two categories. Exterior assets include right-of-way features such as curb ramps, sidewalks, crosswalks, pedestrian ramps, and parking stalls. Interior assets include ADA features located inside buildings such as doorways and entrances, elevators, stairways, drinking fountains, sinks, water closets, telephones, and signage. This transition plan only addresses exterior physical assets.

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

A self-evaluation of physical assets is necessary to indicate where physical barriers limit accessibility within the facilities GSD manages and maintains. The self-evaluation provides a baseline against which progress can be measured, making the process critical to the success of the transition plan. The following sections discuss the methods used to inventory ADA related exterior physical assets and determine ADA compliance.

3.1 Inventory Method

GSD conducted an assessment of its exterior ADA features in the summer of 2016. The data collection method utilized a mobile device in conjunction with a cloud-based application to capture spatial location and associated ADA measurements of each ADA feature. Feature elements were measured using a measuring tape and digital level. Measurements were recorded using a consistent methodology that included measurement of the most restrictive condition. For example, curb ramp slope measurements were taken at several locations within each ramp, but only the most restrictive or worst-case measurement was recorded. This technique established the baseline parameters against which progress towards overall compliance can be measured. Office-based quality control procedures were performed on each feature element of the baseline inventory to check for completeness and identify any obvious errors or inaccuracies. The 2016 data collection effort resulted in a complete database

of exterior ADA features on the Capitol campus. The exterior ADA feature inventory includes crosswalks, curb ramps, pedestrian ramps, parking stalls, and sidewalks.

GSD maintains a geodatabase of ADA exterior features and updates the inventory as new improvements are constructed and accessibility barriers are removed. The database enables GSD to query data, summarize data sets in output reports, conduct annual reporting, and identify progress toward compliance.

3.2 Compliance Status

The Americans with Disabilities Act Accessibility Guidelines (ADAAG) and Public Rightsof-Way Accessibility Guidelines (PROWAG) provide guidance for design of accessible features on new construction and alterations.

The U.S. Access Board developed ADAAG in 1991 and continues to maintain these guidelines for the design of accessible buildings and facilities. ADAAG focuses mainly on buildings and site work and generally does not address conditions unique to public rights-of-way. In 2010, the Department of Justice (DOJ) and the U.S. Department of Transportation adopted enforceable accessibility standards called the 2010 ADA Standards for Accessible Design (2010 Standards). The 2010 Standards are based on ADAAG. Due to the need for accessibility guidelines specific to the public rights-of-way, the Access Board developed the PROWAG, which is the current set of guidelines for design of accessible features in public rights-of-way. PROWAG will become enforceable when the DOJ issues regulations adopting them as standards.

ADAAG and PROWAG provide guidance for determining feature compliance based on a series of element measurements for each feature type. The guidelines establish minimum and maximum measurement tolerances for each feature element. For example, curb ramp cross slope is one element measured as part of curb ramp compliance. The maximum allowable curb ramp cross slope is two percent. If the curb ramp cross slope measurement is greater than two percent, the curb ramp is not ADA compliant per PROWAG guidelines. Appendix A contains a list of each ADA feature measured as part of the 2016 exterior asset inventory effort and the corresponding element measurements used to determine ADA compliance. The following sections provide additional detail regarding compliance status of each feature type.

3.2.1 Curb Ramps

A curb ramp is a ramp that provides an accessible transition between a roadway and a sidewalk or along other pedestrian routes such as a transition from a sidewalk to a parking lot. In order to comply with the ADA, GSD must provide curb ramps at every pedestrian crossing where the sidewalk intersects a curb. PROWAG guidelines specify recommendations for curb ramp width, slope, cross slope, and placement and for associated elements such as the landing, flares, gutter, detectible warning device, and pedestrian signal actuator button if the intersection is signalized.

Figure 2 depicts the results of the 2016 curb ramp inventory. There are currently 124 existing curb ramps on the Capitol campus. Of the existing ramps, three ramps are ADA compliant and the remaining 121 ramps are not compliant. Three locations were identified where a curb ramp is not currently provided at a pedestrian crossing.

Although the majority of the existing curb ramps are non-compliant, the degree of noncompliance varies among the ramps. Most of the ramps on the campus are relatively old and were installed prior to adoption of the ADA. Many of the older ramps have ramp and landing slopes and cross slopes that are greater than the maximum tolerances specified by PROWAG. Additionally, many of the older ramps do not contain detectable warning devices. There are other areas of the campus that contain newer curb ramps that meet all or most of the compliance measurements and criteria for curb ramps. For example, the ramps along Montana Avenue were reconstructed recently and meet most of the recommendations for slopes and widths and also contain detectable warning devices. In many cases, the newer ramps were marked non-compliant due to one feature being out of compliance such as a worn or damaged detectable warning device.

Each curb ramp was assigned a compliance score to indicate degree of non-compliance and assist with prioritization of improvements. Seven curb ramp element measurements including ramp slope, ramp cross slope, ramp width, landing length, landing width, landing slope, and landing cross slope were used to assign compliance scores. Three additional non-measured curb ramp elements were also used to assign scores. These include whether the ramp is flush with the surface, whether the curb ramp contains a detectable warning device, and whether the ramp contains any tripping hazards. If the element is compliant, a score of one was given for that element. If an element is noncompliant, that element either received a score of zero in the case of non-measureable elements or a score between zero and one for measurable elements. For example, a ramp with a slope of 10 percent received a ramp slope element score of 0.83 (8.3 percent maximum/10 percent measured). If all ten elements are compliant, the ramp received a score of 10. A higher score indicates a higher degree of compliance while a lower score indicates a lower degree of compliance.

Figure 2 depicts curb ramp locations and corresponding compliance scores. Curb ramps with lower scores are considered higher priorities for replacement. In addition to degree of compliance, GSD also considers relative demand when prioritizing curb ramp or other ADA related improvements. Figure 2 depicts phased boundaries of the campus. A lower phase number indicates areas of the campus with more frequent use and higher demand by the public while a higher phase number indicates sites with more infrequent use and less demand by the public. For example, the State Capitol Building and Montana Historical Society reside within Phase 1 indicating these facilities have higher potential for use by the public. GSD considers both relative demand and degree of compliance when prioritizing ADA improvements.



Figure 2 Curb Ramp Inventory





3.2.2 Crosswalks

A crosswalk is the portion of the roadway designated for pedestrians to use in crossing the street. PROWAG guidelines specify recommendations for crosswalk slope, cross slope, and width. A crosswalk may be identified with appropriate pavement markings such as two horizontal lines, a ladder design, or diagonal markings. The Manual of Uniform Traffic Control Devices (MUTCD) specifies guidelines for when crosswalks should be marked in addition to standards for markings.

Figure 3 depicts the results of the 2016 crosswalk inventory. There are currently 31 existing crosswalks on the Capitol campus. Of the existing crosswalks, four are ADA compliant and the remaining 27 crosswalks are non-compliant. Figure 3 also indicates which crosswalks do not have pavement markings.







3.2.3 Accessible Parking Spaces

Designated accessible parking spaces provide people with disabilities easier access to building entrances. Accessible parking spaces should be located on the shortest accessible route of travel to an accessible facility entrance and provide additional space to allow a person using a wheelchair to enter and exit a vehicle.

The 2010 Standards specify requirements for the minimum number of accessible parking spaces required within a parking facility based on the number of total parking spaces provided within a facility. Figure 4 depicts the parking facilities within the Capitol campus in addition to the existing accessible parking spaces. Each parking facility is labeled with a letter that corresponds to information presented in Table 4. Table 4 lists the approximate number of existing parking spaces within each facility and the corresponding number of required accessible car and van spaces per the 2010 Standards. In many cases within the campus, two or more parking facilities serve the same building. Minimum number requirements should always be calculated based on keeping the parking facilities separate; however, accessible parking spaces may be grouped together into one facility if that facility provides greater accessibility in terms of distance to an entrance or increased user convenience.

		Approx. Total	Required Accessible Spaces		
Parking Facility Map Label	Buildings Served	Existing Parking Spaces (All Spaces)	Van	Car	Total
A	1	<25	1	0	1
В	2	18	1	0	1
С	2	6	1	0	1
D	3	236	2	5	7
E	3	56	1	2	3
F	7,8,9,10	25	1	0	1
G	10	108	1	4	5
Н	6	13	1	0	1
	6	57	1	2	3
J	11	41	1	1	2
K	5,12	419	2	7	9
L	14	31	1	1	2
М	13	66	1	2	3
N	13	119	1	4	5
0	15	56	1	2	3
Р	15,16	121	1	4	5
Q	16	71	1	2	3
R	17,18	43	1	1	2
S	28	104	1	4	5
Т	27	80	1	3	4
U	29	43	1	1	2
V	30	41	1	1	2
W	31	24	1	0	1

Table 4 Accessible Parking Spaces

Parking facilities on the Capitol campus generally comply with minimum number requirements for accessible spaces with the exception of a few locations. As parking facilities are restriped, GSD reviews minimum number requirements and locates accessible parking spaces throughout the facilities to enable parking near as many accessible entrances as possible.

Figure 4 depicts the results of the 2016 accessible parking space inventory. There are currently 97 existing accessible spaces on the Capitol campus. The majority of the accessible spaces are located within parking facilities. Nine existing spaces are parallel on-street parking spaces. Many elements are considered to determine accessible parking space compliance including signage, presence of an access aisle, vehicle space and access aisle widths, access aisle markings, and ground surface slopes. All of the existing 97 accessible spaces have at least one element out of compliance. The majority of the spaces have slopes or cross slopes that are greater than two percent and many of the spaces also have parking sign mounting heights that are below the minimum requirement. Spaces with only slope or signage issues are identified on Figure 4 and denoted with a blue colored symbol. The remaining spaces are denoted with a red symbol and represent parking spaces that could have slope and signage issues as well but also have other elements out of compliance such as no identified access aisle, no access aisle markings, or inadequate vehicle or access aisle widths. These elements will require restriping to remedy the deficiencies.









3.2.4 Pedestrian Access Routes

Sidewalks provide circulation paths for pedestrians and are an important component of pedestrian access routes. Sidewalks should be at least four feet wide per PROWAG; however, generally accepted design guidelines recommend sidewalks be at least five feet wide, especially in urban areas. If sidewalks are less than five feet wide, a passing space should be provided at least every 200 feet. Slope recommendations include a maximum running slope of five percent and a maximum cross slope of two percent. For sidewalk located adjacent to roadways, the running slope is allowed to exceed five percent as long as the slope does not exceed the general grade established by the street. Vertical surface discontinuities are not allowed to be greater than one-half inch.

Sidewalks were inventoried as part of the 2016 inventory effort. Width, slope, and tripping hazard information was recorded at 10-foot intervals along each pedestrian access route. The end result of this inventory was a series of points along each route spaced at approximate 10-foot intervals. The points were translated into line features and are depicted on Figure 5. Figure 5 also depicts the corresponding sidewalk compliance designation. Non-compliant sidewalk generally results from cross slopes that exceed the two percent maximum slope. Additionally, many of the internal sidewalks that are not adjacent to roadways are four feet wide and do not have appropriate passing spaces. Tripping hazards also exist at several locations and are depicted on Figure 5.



Figure 5 Sidewalk Inventory





ADA requirements state that at least one accessible route must be provided from accessible parking spaces and public streets and sidewalks to the accessible building or facility entrance they serve. The majority of the buildings within the Capitol campus have multiple entrances. Many of the entrances are not accessible due to stairways located prior to the entrance. Most buildings generally have at least one entrance that is accessible due to a pedestrian ramp or because the entrance is at grade and does not require a ramp. Figure 6 depicts the existing sidewalk, stairways, and pedestrian ramps on the campus. Accessible entrances are provided on all buildings with the exception of buildings 4, 19-23, and 26. The statue located north of the State Capitol building is also non-accessible due to existing stairways on all routes leading to the statue.

Pedestrian ramps are included in the inventory. Pedestrian ramp compliance is based on measurements of ramp dimensions, slopes, and other feature elements such as the handrail and surfaces. All of the inventoried ramps had at least one element out of compliance. Several of the ramps are older and constructed of wood. Many of the newer ramps had slope and cross slope measurements outside of the required maximum tolerances.



Figure 6 Pedestrian Access Routes





4.0 IMPLEMENTATION PLAN AND SCHEDULE

GSD is committed to eliminating accessibility barriers for individuals with disabilities within its programs, rights-of-way, and building facilities. As required under 28 CFR 35.150(d)(3), GSD must specify a schedule for taking necessary steps to achieve ADA compliance. An implementation plan and schedule provides a timeline for addressing deficiencies and eliminating physical barriers identified through inventory. The following sections highlight some of the key implementation steps and methods GSD uses to address external ADA deficiencies on the Capitol campus.

4.1 Funding

GSD strives to address ADA improvements through routine reconstruction projects funded through various federal and state funding programs. GSD continually evaluates funding availability in targeting ADA barriers. Appendix B contains construction cost estimates for ADA features including curb ramps, crosswalks, accessible parking spaces, and sidewalk replacement. The cost estimates are used to summarize improvements by phase and determine potential projects based on available funding.

4.2 Schedule

Given the number of exterior deficiencies identified on the Capitol campus, the associated cost for improvements, and funding limitations, full compliance is anticipated to be achieved over a series of years. For each year of implementation, GSD will develop a plan outlining specific actions to be completed during the year.

At the end of each year, GSD completes an annual update report (contained in Appendix C) summarizing completed ADA improvement projects. The report enables GSD to track progress in removing accessibility barriers and achieving ADA compliance.

4.3 Implementation Strategies

The following sections identify strategies GSD uses to implement the transition plan and to develop projects to address ADA deficiencies. Strategies are identified for project identification, design and construction, and operation and maintenance.

4.3.1 **Project Identification**

GSD prioritizes ADA improvement projects based on consideration of a range of factors including degree of noncompliance, number of noncompliant features, safety, and public feedback. The number of noncompliant features and the degree of compliance (indicating the severity of the accessibility barrier) influence project prioritization. GSD also considers public input and maintains a documented response process for comments regarding ADA. A location with common complaints or safety issues may provide further justification for an ADA improvement project.

GSD identifies the appropriate level of ADA involvement depending on project classification, including new construction, reconstruction, rehabilitation, resurfacing, and preventative maintenance projects. For new construction and reconstruction projects, pedestrian facilities are designed and constructed to meet all relevant ADA requirements. In the case of resurfacing and rehabilitation projects involving alterations to existing infrastructure, existing pedestrian facilities are upgraded to meet ADA requirements to the extent technically feasible.



GSD regularly communicates with the City of Helena to discuss upcoming projects. This communication helps GSD identify and plan its ADA improvements to coordinate with local efforts. In some cases, opportunities for coordinating project phasing may benefit GSD and local entities by incorporating ADA elements into larger projects, and avoiding costly re-work at a future date.

4.3.2 Design and Construction

ADA improvements are designed and reviewed by professional engineers trained in ADA design, construction, and retrofit complexities. GSD strives to allow for construction flexibility in the design of ADA features. Designing a pedestrian feature at the threshold of ADA requirements can cause difficulty in the field during construction. Without room for error or field fitment, the feature may inadvertently be constructed in exceedance of ADA thresholds, resulting in noncompliance. For example, a ramp cross slope designed to meet the 2% recommended maximum may be constructed at a slope of 2.1% due to a variety of unforeseen field conditions or construction methods. The ADA Coordinator assures designs adhere to applicable ADA regulations, policies, and design standards and facilitates the proper reviews and coordination with the City of Helena.

In some situations involving improvements to existing infrastructure, it is infeasible to comply with ADA requirements within the scope limitations of the project. For example, steep existing grades, historic features, storm drainage, limited right-of-way, and obstacles such as utility poles may impede the ability to meet ADA requirements at a particular location. GSD applies a process for technical infeasibility to determine and document these conditions on each project. In all cases, GSD designs and constructs ADA features in compliance with ADA requirements to the maximum extent feasible.

GSD monitors the installation of ADA features during construction and field personnel measure new features to determine conformance with the design plans. GSD reflects reconstructed features in the geodatabase of external ADA features.

ADA implementing regulations (28 CFR 35.133(b)) allow for isolated temporary interruptions in service or access due to maintenance or repairs. During construction activities, GSD strives to maintain accessibility in a manner comparable to conditions prior to construction, to the extent feasible.

4.3.3 Operation and Maintenance

GSD is generally responsible for physical maintenance of GSD rights-of-way including sidewalks, curb ramps, and other exterior features. The City of Helena is responsible for maintaining roadways.

Over the course of a year, ADA features may become damaged or worn as a direct result of maintenance activities or due to normal wear and weathering. For example, blades used during wintertime snow removal may damage detectable warning devices, and freeze/thaw cycles may cause pavement cracking resulting in trip hazards. GSD performs regular maintenance inspections and reports and documents any ADA issues and concerns. The level of needed improvement is determined and addressed through maintenance activities or through an improvement project as warranted.

GSD is responsible for maintaining its rights-of-way in operable working condition throughout the year. During the winter, snow and ice buildup can limit the accessibility



of an otherwise compliant pedestrian facility. GSD assures regular removal of snow and ice to maintain ADA accessibility.

5.0 PUBLIC AND STAKEHOLDER OUTREACH

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

5.1 Plan Availability

The 2016 draft transition plan was made available for public review and comment from October 14, 2016, to November 14, 2016. A link to the draft document was provided on the GSD webpage. Alternate accessible formats of the document were made available upon request. GSD issued a statewide press release announcing the availability of the document. No public comments were received on the draft transition plan. Documentation is provided in Appendix D.



Exterior Inventory Compliance Standards

Feature Type	Feature Element	Compliance Requirements
	Ramp Layout	Perpendicular, Parallel, Blended
	Flush With Surface	Yes
	Ramp Slope	8.3% Maximum
	Ramp Cross Slope	2% Maximum
	Ramp Width	48" Minimum
	Landing Length	48" Minimum
	Landing Width	48" Minimum
	Landing Slope	2% Maximum
Š	Landing Cross Slope	2% Maximum
dmg	Flare Slope Right	10% Maximum
Curb Ramps	Flare Slope Left	10% Maximum
Curl	Gutter Slope	5% Maximum
Ŭ	Detectable Warning Device	Yes
	DWD Condition	Good
	DWD Color Contrast	Yes
	Vertical Surface Discontinuities (Trip Hazards)	1/2" Maximum
	Push Button Clear Space Length	48" Minimum
	Push Button Clear Space Width	30" Minimum
	Push Button Height	48" Maximum
	Push Button Clear Space Max Slope	2% Maximum all directions

Feature Type	Feature Element	Compliance Requirements
	Slope	5% Maximum
Crosswalks	Cross Slope	2% Maximum (crossings with stop or yield control)
Cros		5% Maximum (crossings without stop or yield control)
	Width	72" Minimum

Feature Type	Feature Element	Compliance F	Requirements	
		Total Number of Parking Spaces Provided in Parking Facility	Minimum Number of Required Accessible Parking Spaces	
		1 to 25 26 to 50	1 2	
		51 to 75 76 to 100 101 to 150	3 4 5	
	Minimum Number per Parking Facility	151 to 200 201 to 300	6 7	
		301 to 400 401 to 500	8 9	
		501 to 1000 1001 and over	2 percent of total 20, plus 1 for each 100, or fraction thereof, over 100	
paces		For every six or fraction of six parking spaces, at least one shall be a van parking space.		
Accessible Parking Spaces	Parking Sign with International Symbol of Accessibility	Yes except where four or fewer parking spaces, including accessible parking spaces, are provided. Signs identifying van parking spaces shall contain		
ole Pa		the designation "van accessible".		
essik	Sign Mounting Height	60" Minimum above the finish floor or ground surface measured to the bottom of the sign.		
Acc	Vehicle Space Width	96" Minimum for a Car Parking Space 132" Minimum for a Van Parking Space		
		96" Minimum for a Van Pa Access Aisle >= 96"	-	
	Adjacent Access Aisle	Yes except for parallel on-street parking spaces where the adjacent sidewalk or available right-of- way is less than or equal to 14 feet (168") wide.		
	Access Aisle Width	60" Minimum		
	Access Aisle Length	Shall extend the full length of the parking spaces they serve.		
	Access Aisle Markings	Yes		
	Access Aisle Location	Either side of the parking space except for angled van spaces which shall have access aisles on the passenger side of the parking space		
	Parking Space and Access Aisle Slopes and Cross Slopes	2% Maximum		

Feature Type	Feature Element	Compliance Requirements
Pedestrian Access Routes	Continuous Clear Width	48" Minimum Where the clear width is less than 60", passing spaces shall be provided at intervals of 200 feet maximum.
ess	Passing Space Dimensions	60" x 60" Minimum
n Aco	Slope if contained within a street right-of-way	Slope shall not exceed the general grade established for the adjacent street.
stria	Slope if not contained within a street right-of-way	5% Maximum
ede	Cross Slope	2% Maximum
L	Vertical Surface Discontinuities (Trip Hazards)	1/2" Maximum

Feature Type	Feature Element	Compliance Requirements
	Ramp Slope	8.3% Maximum
	Ramp Cross Slope	2% Maximum
	Ramp Rise	30" Maximum
	Ramp Width	36" Minimum
	Top Landing Slope	2% Maximum
	Top Landing Cross Slope	2% Maximum
	Top Landing Width	60" Minimum
	Top Landing Length	60" Minimum
	Bottom Landing Slope	2% Maximum
	Bottom Landing Cross Slope	2% Maximum
	Bottom Landing Width	60" Minimum
	Bottom Landing Length	60" Minimum
	Does ramp contain 60" level pad every 30'?	"Yes"
sdu	If rise is 6" or more is a handrail provided?	"Yes"
Pedestrian Ramps	Do Ramps 72" or longer have handrails on both sides?	"Both Sides"
triaı	Continuous handrails?	"Yes"
desi	Handrails immobile in fittings?	"Yes"
Рес	Distance handrails extend horizontally at top landing	12" Minimum
	Distance handrails extend horizontally at bottom landing	12" Minimum
	Continuous gripping surface?	"Yes"
	Height of top gripping surface?	34" Minimum - 38" Maximum
	Clearance between gripping and adjacent surface	1.5" Minimum
	Continuous gripping surface?	"Yes"
	Surface free from shard or abrasive elements	"Yes"
	Continuous gripping surface?	"Yes"
	Height of top gripping surface?	34" Minimum - 38" Maximum
	Clearance between gripping and adjacent surface	1.5" Minimum
	Continuous gripping surface?	"Yes"
	Surface free from shard or abrasive elements	"Yes"



Construction Cost Estimates

	Curb Ramp Construction Cost Estimate							
ltem Number	Quantity	Description	Unit	Unit Price	Amount			
1	37	Sidewalk-Concrete 4 IN	SQYD	\$65.00	\$2,405.00			
2	2.3	Detec Warning Devices-Type 1	SQYD	\$300.00	\$690.00			
3	40	Curb-Concrete	LNFT	\$30.00	\$1,200.00			
4	1	Landscaping	LS	\$200.00	\$200.00			
5	1	Relocate Sprinkler	LS	\$100.00	\$100.00			
6	1	Traffic Control	LS	\$500.00	\$500.00			
					\$5,095.00			
	10%	Mobilization			\$509.50			
		Subtotal			\$5,604.50			
	25%	Contingency			\$1,401.13			
		Construction Total			\$7,005.63			

Note: Cost is for two curb ramps on one corner.

	Crosswalk Construction Cost Estimate							
ltem Number	Quantity	Description	Unit	Unit Price	Amount			
1	8	Crushed Aggregate Course	CUYD	\$35.00	\$280.00			
2	12	Commercial Mix-PG 64-28	TON	\$200.00	\$2,400.00			
3	1	Traffic Control	LS	\$1,000.00	\$1,000.00			
4	1	Striping-White Paint	GAL	\$150.00	\$150.00			
					\$3,830.00			
	10%	Mobilization			\$383.00			
		Subtotal			\$4,213.00			
	25%	Contingency			\$1,053.25			
		Construction Total			\$5,266.25			

Note: Cost is to correct the grade of an eight-foot wide crosswalk.

	Accessible Parking Space Construction Cost Estimate							
ltem Number	Quantity	Description	Unit	Unit Price	Amount			
1	6	Crushed Aggregate Course	CUYD	\$35.00	\$210.00			
2	7	Commercial Mix-PG 64-28	TON	\$200.00	\$1,400.00			
3	1	Pin Down Curb	EACH	\$150.00	\$150.00			
4	1	Words and Symbols-White Paint	GAL	\$200.00	\$200.00			
5	1	Sign	EACH	\$250.00	\$250.00			
					\$2,210.00			
	10%	Mobilization			\$221.00			
		Subtotal			\$2,431.00			
	25%	Contingency			\$607.75			
		Construction Total			\$3,038.75			

Note: Cost is for an 18-foot long space with an access aisle.

	Sidewalk Replacement Cost Estimate							
ltem Number	Quantity	Description	Unit	Unit Price	Amount			
1	56	Sidewalk-Concrete 4 IN	SQYD	\$65.00	\$3,640.00			
2	1	Landscaping	LS	\$500.00	\$500.00			
3	1	Relocate Sprinkler	LS	\$300.00	\$300.00			
4	1	Traffic Control	LS	\$750.00	\$750.00			
					\$5,190.00			
	10%	Mobilization			\$519.00			
		Subtotal			\$5,709.00			
	25%	Contingency			\$1,427.25			
		Construction Total			\$7,136.25			

Note: Cost is to correct 100-feet of 5-foot sidewalk.

Montana State Capitol Exterior ADA Transition Plan

			ပိ	pustruction d	Construction Cost Summary	2			
Dhaco	Curb Reconsi	Curb Ramp Reconstruction	Crosswalk Reconstruction	walk ruction	Accessib Space Rec	Accessible Parking Space Reconstruction	Side Recons	Sidewalk Reconstruction	Total Cost
	Corners	Total	Crosswalks	Total	Spaces	Total	Lineal Feet	Total	per Phase
. 	27	\$189,152	13	\$68,461	14	\$42,543	5,049	\$360,323	\$660,478
2	13	\$91,073	4	\$21,065	12	\$36,465	2,727	\$194,592	\$343,195
с	43	\$301,242	7	\$36,864	38	\$115,473	6,468	\$461,549	\$915,127
4	18	\$126,101	-	\$5,266	20	\$60,775	2,952	\$210,693	\$402,835
5	4	\$28,023	0	\$0	2	\$6,078	595	\$42,474	\$76,574
9	9	\$42,034	2	\$10,533	11	\$33,426	1,724	\$123,038	\$209,031
Total	111	\$777,624	27	\$142,189	67	\$294,759	19,515	\$1,392,669	\$2,607,240



Annual Update Report

Part 1: Completed Projects Containing ADA Improvements

Fiscal	Project Name and		Estimated	ADA Feature	s Addressed
Year	Project Name and Location	Project Scope	Cost	Feature Type	Number of Features

Part 2: Completed Inventory or Program Administration/Communications Actions



FOR IMMEDIATE RELEASE

October 14, 2016

Josh LaFromboise, DOA GSD Exterior ADA Coordinator, (406) 444-3060

Montana Department of Administration General Services Division Publishes Draft Exterior ADA Transition Plan for Public Comment

HELENA – The Montana Department of Administration (DOA) General Services Division (GSD) is seeking public comment on the newly-published draft of the Montana State Capitol Exterior Americans with Disabilities Act (ADA) Transition Plan. The plan identifies exterior ADA barriers and provides guidance to work toward making all GSD facilities fully accessible to individuals with disabilities.

The plan applies to all exterior physical assets owned and/or operated and maintained by GSD within the State Capitol campus including: curb ramps, crosswalks, accessible parking spaces, and pedestrian access routes.

An electronic version of this document may be viewed on GSD's website at the following link:

Print copies or alternate accessible formats of the plan are available upon request.

Please submit requests or written comments to:

Josh LaFromboise Department of Administration General Services Division 1310 East Lockey PO Box 200110 Helena, MT 59620

GSD welcomes comment on the transition plan at any time, but comment must be received by **November 14, 2016,** to be considered in the final transition plan document.

The Department of Administration General Services Division attempts to provide accommodations for any known disability that may interfere with a person's participation in any department service, program, or activity. Alternate accessible formats of this information will be provided upon request. Contact the department's ADA coordinator at (406) 444-3030.





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