

ADA TRANSITION PLAN

TOWN OF MAMMOTH LAKES

2014

Town of Mammoth Lakes
437 Old Mammoth Road
Mammoth Lakes, CA 93546



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Section 1: Executive Summary

Section 1.1: Introduction

The ADA Transition Plan for Public Rights-of-Way documents the legal and functional goals and objectives of the Town of Mammoth Lakes (TOML) in order to make existing pedestrian facilities within the public right-of-way accessible and usable for persons with disabilities. The ADA Transition Plan has been prepared pursuant to the Americans with Disabilities Act (ADA), which requires that all public agencies develop a transition plan for the installation of curb ramps or other sloped areas at all locations where walkways cross curbs as well as buildings providing a public service. The plan is required to give a schedule for curb ramp installation and building updates, as well as describing other improvements necessary to achieve programmatic accessibility for persons with disabilities. The main purpose of this transition plan is to describe the curb ramp and pedestrian facility needs within the Town and to outline the recommended procedures for implementing and scheduling remedial work to provide a complying system of curb ramps, sidewalks, and related facilities within the public right-of-way or public facilities owned by the Town to provide a public service.

The ADA Transition Plan is one component of a larger project intended to optimize the pedestrian experience; provide safe and usable pedestrian facilities for all pedestrians, and; assure compliance with all federal, state, and local regulations and standards. Other components of this project include the Pedestrian Master Plan and Pedestrian Design Guidelines. Together, these three documents are intended to provide guidance for the design and installation of the wide variety of facilities within the public right-of-way. These facilities include streets and roadways, vehicular and pedestrian bridges, underground and above-ground utilities, vehicular and pedestrian signal systems, signage systems, on-street parking facilities, sidewalks with curb ramps at intersections, planting strips and buffers, pedestrian activity areas, building providing a public service, and unimproved open spaces that are part of the public right-of way.

Section 1.2: Inventory Efforts

A major effort of the project was to undertake inventory surveys of existing pedestrian facilities within the Town right-of-way, to provide a baseline of what facilities and to comply with ADA and State of California Title 24 requirements and Town-approved policies.

In April 2011, the process of surveying pedestrian facilities was undertaken to document the existing conditions within the public right-of-way under the jurisdiction of the Town of Mammoth Lakes. Surveying used in this section, refers to visiting the particular location by our TOML Senior Public Works Inspector to obtain measurements, dimensions, gradients and other visual determinations as appropriate depending on the particular location. A review of the survey process is listed below:

- Various buildings owned or leased by the Town to provide a public service, including evaluation of restrooms and accessibility throughout the building
- Approximately 100 miles of roadways were traveled and surveyed to document physical conditions along the roadways.
- The inventory focused on roadways within the Town's jurisdiction and on those roadways serving governmental, public service, and commercial uses.
- For roadways surveyed, the Town documented two-lane or four-lane roads and sidewalks (when placed on one side or both sides of the road) within the Town jurisdictional limits.
- Approximately 150 street corners were surveyed, and measurements were taken for a variety of dimensions and gradients.

Section 1.3: ADA Design Standards

The ADA Codes and Standards were developed to combine and resolve any conflicts between the *Americans with Disabilities Act Accessibility Guidelines* (ADAAG), published by the U.S. Architectural and Transportation Barriers Compliance Board in July 1991 and amended in September 2010, and the *California State Building Code, Title 24, Part 2*, of the California Code of Regulation, 2013 edition. *Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way*, published by the U.S. Architectural and Transportation Barriers Compliance Board on July 2011, also were considered in the ADA Codes and Standards. In addition, all Town of Mammoth Lakes approved policies and standards as well as CalTrans Standard Specifications affecting accessibility in the public right-of way were included in the standards.

Section 1.4: Public Participation

The Town of Mammoth Lakes used the Pedestrian Master Plan, General Bikeway Plan, and the ADA Transition Plan to encourage and promote public participation throughout the community. Outreach efforts included the following:

- Public hearings: Hearings occurred at the Planning and Community Development Commission, Mobility Commission and Airport Commission
- Town of Mammoth Lakes Website: The website requested public comments for approximately one month
- Workshops: Workshops focused on the community's input for priority projects to construct
- Local newspapers: Ads were placed in the Sheet, a local newspaper, to request survey participation

The community will be able to submit formal comments about this ADA Transition Plan, either in written form or at a public meeting, per ADA requirements.

Section 1.5: ADA Implementation Plan

The ADA Transition Plan focuses on developing a work program for existing conditions to conform to the requirements set by Accessibility measures, initially passed in 1991 and updated to 2010.

Types of projects included can be categorized as follows:

- Curb ramp, sidewalk and intersection retrofit projects, included with street overlay or other street or sidewalk construction projects.
- Curb ramp, sidewalk and intersection retrofit projects deemed essential for mitigation of barriers based upon the finalized ADA Transition Plan.
- Curb ramp, sidewalk and intersection retrofit projects, in conjunction with construction by private parties.
- Curb ramp construction or replacement projects based upon resident request.
- Street and sidewalk construction or retrofit projects planned for the improvement of overall pedestrian facilities.
- Pedestrian signals if provided as part of new projects.
- Roadway widening projects.
- Building rehabilitations within areas offering a public service, including but not limited to bathrooms and help desks

In total, the Town of Mammoth Lakes shall complete approximately 34 projects to come into compliance Town-wide.

Section 2: Introduction and Administrative Responsibilities

Section 2.1: Introduction to the ADA

The Americans with Disabilities Act (ADA), enacted on July 26, 1990, provides comprehensive civil rights protections to persons with disabilities in the areas of employment, state and local government services, access to public accommodations, transportation and telecommunications. The ADA is companion civil rights legislation with the Civil Rights Act of 1964 and Section 504 of the Rehabilitation Act of 1973. This legislation mandates that qualified disabled individuals shall not be excluded from participation in, denied the benefit of, or be subjected to discrimination under any program or activity. The Act also protects employees with disabilities, with certain protections and requires employers to make reasonable accommodation for applicants and employees with disabilities.

The ADA is divided into five parts, covering the following areas:

Title I: Employment

Under Title I, employers, including governmental agencies, must ensure that their practices do not discriminate against persons with disabilities in the application, hiring, advancement, training, compensation or discharge of an employee, or in other terms, conditions and rights of employment.

Title II: Public Services

Title II prohibits state and local governments from discriminating against persons with disabilities or from excluding participation in or denying benefits of programs, services or activities to persons with disabilities. It is under this Title that this ADA Transition Plan has been prepared. The ADA Transition Plan is intended to outline the methods by which physical or structural changes will be made to effect the non-discrimination policies described in Title II.

Title III: Public Accommodations

Title III requires places of public accommodation to be accessible to and usable by persons with disabilities. The term public accommodation as used in the definition often is misinterpreted as applying to public agencies, but the intent of the term is to refer to any privately funded and operated facility serving the public.

Title IV: Telecommunications

Title IV covers regulations regarding private telephone companies, and requires common carriers offering telephone services to the public to increase the availability of interstate and intrastate telecommunications relay services to individuals with hearing and speech impairments.

Title V: Miscellaneous Provisions

Title V contains several miscellaneous regulations, including construction standards and practices, provisions for attorney's fees and technical assistance provisions.

Title II of the ADA dictates that a public entity must evaluate its services, programs, policies and practices to determine whether they are in compliance with the nondiscrimination regulations of the ADA. The regulations detailing compliance requirements were issued in July 1991. A self-evaluation also is required. It is intended to examine activities and services, identify problems or barriers that may limit accessibility by persons with

disabilities, and describe potential compliance solutions. The entity then must proceed to make the necessary changes resulting from the self-evaluation. The ADA further requires that an ADA transition plan be prepared to describe any structural or physical changes required to make programs accessible.

In the ADA, the term disability means, with respect to an individual:

- (1) a physical or mental impairment that substantially limits one or more of the major life activities of such individual;
- (2) a record of such an impairment; or
- (3) being regarded as having such an impairment.

If an individual meets any one of these three tests, that person is considered to be an individual with a disability for purposes of coverage under the Americans with Disabilities Act. The Final Rules of the ADA describe in greater detail the conditions included and excluded as disabilities under the ADA. These rules are available upon request from the study team, and are incorporated by reference as part of this ADA Transition Plan.

Section 2.2: TOML Responsibilities under the ADA

The Town of Mammoth Lakes (TOML) has various responsibilities under Title II of the ADA. Title II of the ADA is similar to Section 504 of the Rehabilitation Act of 1973, but differs in that Section 504 applies only to government agencies that receive federal financial assistance. The purpose of Section 504 is to ensure that no otherwise qualified individual with disabilities shall, solely by reason of disability, be discriminated against under any program or activity receiving federal financial assistance. TOML has been subject to and operating under the requirements of Section 504 for many years.

The ADA specifically states an intent not to apply lesser standards than are required under other federal, state or local laws; therefore, the law that is the most stringent has precedence. This intent has particular application with respect to TOML's obligations under Section 504 or under Title 24 of the California Code of Regulations, which in some cases, exceed ADA requirements with respect to structural and physical changes.

Title II also mandates that local governments may not require eligibility criteria for participation in programs and activities that would screen persons with disabilities, unless it can be proven that such requirements are necessary for the mandatory provision of the service or program. A public entity must reasonably modify its policies and procedures to avoid discrimination toward disabled residents. However, if the public entity can demonstrate that a modification fundamentally would alter the nature of its service, it would not be required to make that modification. Title II also discusses the use of auxiliary aids necessary to enable persons who have visual, hearing, mobility or similar impairments to gain access to programs and activities provided by the Town so as to make an appropriate reasonable accommodation.

The lone exception to these requirements would be because of undue hardship. Undue hardship is defined in the ADA as an "action requiring significant difficulty or expense" when considering the nature and cost of the accommodation in relation to the size, resources and structure of the specific operation. Undue hardship is determined on a case-by-case basis.

A public entity also is required to designate a person to be responsible for coordinating the implementation of ADA requirements and for investigating complaints of alleged noncompliance. At the time of the ADA Transition Plan preparations, for the intent of this portion of the ADA Transition Plan that relates to streets, sidewalks, public rights-of-way and Town-owned building/facilities, that designated person is the Director of Public Works, 437 Old Mammoth Road, Mammoth Lakes, CA 93546.

Section 2.3: ADA Transition Plan Requirements

A public agency is required to prepare an ADA Transition Plan if physical or structural modifications to facilities are required to provide access to programs or services. Title II of the ADA regulates government agencies, with its primary goal being to ensure that all of their programs and services are accessible to individuals with disabilities. The ADA Transition Plan is limited to evaluating physical barriers; however, an analysis of the programs and services rendered by the Town also is important to determine what physical changes are necessary. The ADA Transition Plan documents what actions the Town will take to alter its facilities. The ADA requires that the ADA Transition Plan be submitted for public review before final approval and adoption by the appropriate regulatory agency.

Generally, the ADA Transition Plan lists existing barriers in the public rights-of-way under the Town's jurisdiction, and schedules which barriers to remove to provide access for individuals with disabilities to TOML programs. The Town is required to provide access to all of its programs, but is not required to remove all architectural barriers in all of its facilities. In addition to making physical improvements, government agencies can choose among various administrative solutions, such as relocating or modifying a particular program, to obtain overall program access.

The transition plan is required by Department of Justice rules to address the following aspects of accessibility:

- (1) If a public entity has responsibility or authority over streets, roads or walkways, its ADA Transition Plan shall include a schedule for providing curb ramps or other sloped areas where pedestrian walks cross curbs, giving priority to walkways serving entities covered by the ADA, including State and local government offices and facilities, transportation, places of public accommodation, and employers, followed by walkways serving other areas;
- (2) The transition plan shall identify physical obstacles in the public entity's facilities that limit the accessibility of its programs or activities to individuals with disabilities;
- (3) The transition plan shall describe the methods that will be used to make the facilities accessible; and
- (4) The transition plan shall specify the schedule for taking the steps necessary to achieve compliance with the ADA and, if the time period of the ADA Transition Plan is longer than one year, identify steps that will be taken during each year of the transition period.

This transition plan describes the barriers found in the public right of way under the Town's jurisdiction. It includes a plan for removing the physical barriers necessary to achieve program access. The transition plan contains detailed physical barrier surveys of Town streets, curb ramps, sidewalks, public service buildings, and related facilities. These surveys are contained in a comprehensive computer database. The surveys document barriers present at the time of the survey. The survey does not provide a complete listing of complying architectural or physical features. It also is important to note that the dates of the survey for each facility or area are an important "datum," and that improvements made to facilities after the date of the survey are not included.

The ADA does not designate a specific code or standard for evaluating access to existing facilities. Title II gives government agencies a choice between the Uniform Federal Access Standards (UFAS), the Americans with Disabilities Act Accessibility Guidelines (ADAAG) and the Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right of Way (PROWAC) as a standard for renovations. Since the ADA states that it does not override requirements of other state and local requirements, the State of California Title 24 access regulations also must be applied. Therefore, for the purpose of this transition plan, each facility or site area is evaluated based on the most stringent requirements of the ADA Accessibility Guidelines dated July 26, 1991 or Title 24, effective January 1, 2010.

In creating priorities, it is the Town's intent to evaluate all areas of potential deficiency, and to make structural changes where necessary. The assignment of priorities is intended to facilitate public review and to address specific concerns of the local disabled community. It must be emphasized that it is the intent for all individuals with disabilities to be reasonably accommodated by the Town of Mammoth Lakes.

Section 2.4: Description of Program Accessibility

The final Rules and Regulations of the ADA describe the requirements for program accessibility (Code of Federal Regulations, Title 28, Part 35, Subpart D). A public entity shall operate each service, program or activity, when viewed in its entirety, so that it is accessible to and usable by individuals with disabilities. The ADA does not require the public entity to make all of its existing facilities accessible, nor does it require a public entity to take any action that would fundamentally alter the nature of a service, program or activity. Also, it does not require implementation of the ADA that would result in undue financial and administrative burdens. In such cases where documentation is provided in keeping with strict procedures outlined in the ADA, there are various methods that may be appropriate for providing program accessibility in lieu of making actual physical changes to facilities. However, the Town does include a plan for implementing accessible facilities for areas available to the public.

With these facts in mind, the first step in determining what structural changes to existing facilities are necessary is to develop an understanding of the specific public programs and activities occurring at existing facilities within the Town. This section attempts to develop these goals. However, it should be noted that this section is not intended to be a “formal self-evaluation”, as described in the ADA. A self-evaluation includes the analysis of all programs and services offered by a public entity. This may include communications, publications, employment, and many other factors that are separate from proposed physical modifications to facilities.

The activity of using the public right-of-way may be considered a program in three different ways:

- (1) Streets, sidewalks and curb ramps may be part of a continuous path of travel between activities or programs, at various public and private facilities located on adjacent properties, such as public offices, schools, parks and recreational facilities, public service agencies, hospitals and health clinics, police facilities and public housing uses.
- (2) Streets, sidewalks and curb ramps may themselves represent a program of public pedestrian activities that are essential to the usage and enjoyment of a Town’s built environment.
- (3) Existing buildings offering a public service, such as city parks and offices providing a public service.

The Department of Justice’s Title II Technical Assistance Manual points out that a public entity’s programs related to streets, sidewalks and curb ramps may be prioritized with respect to relative importance and frequency of usage. It further describes that program accessibility would not require all streets, sidewalks and curb ramps to be fully accessible as required by current codes. A determination of what public rights-of-way are programmatically required to be accessible may vary from jurisdiction to jurisdiction.

Section 3: Public Participation and Input

Section 3.1 Introduction

The ADA states that a public entity is required to make available to applicants, participants, residents and other interested parties information regarding the transition plan and its applicability to the services, programs or activities of the public entity, and to apprise the public of the protections against discrimination afforded to them by the ADA. A public entity also is required to provide an opportunity for interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the development of the transition plan by submitting comments and making specific recommendations. The ADA also requires that a copy of the draft ADA Transition Plan shall be made available for public inspection during a citizen review period.

The ADA Transition Plan project was set up to encourage and facilitate participation from the community within the Town of Mammoth Lakes. This process included persons with disabilities and those representing disability service organizations. This section describes the public participation and outreach efforts made by the Town and the study team. The section describes the public participation and outreach effort to make the transition plan one that represents the goals and aspiration of the local community.

Section 3.2 Consumer Accessibility Surveys

As part of the public participation process, a consumer survey titled “Town of Mammoth Lakes: Pedestrian Transportation Survey” was prepared by the Town and distributed among the community members and the general public. The survey was advertised in the local newspaper, providing a link for interested parties to comment on the experience of the pedestrian with the Town. At the completion of the survey, TOML had received approximately twenty responses. The survey asked a number of questions about the experiences of all pedestrians encountered along Town sidewalks and within the public right-of-way, and it solicited opinions on existing conditions and suggestions for improvements. The survey was used to better understand what conditions exist and how to better serve the Town’s citizens.

The survey results do not clearly state the problem areas for disable citizens, but the population in general. The applicable parts of the survey are included below, and responses are received are tabulated to show trends with specific concerns and suggestions.

1) What is the usual purpose of your walking trip?

Pleasure	31.25%
Exercise/Health	18.75%
Personal/Family Business	6.25%
School/Church/Civic	0%
To Work	25%
Walking Dog	18.75%

2) How long do each of your typical walking trips take, in minutes?

1-15 minutes	37.50%
16-25 minutes	12.50%
25-35 minutes	18.75%
36-60 minutes	31.25%
60+ minutes	0%

3) How long do you usually walk on Town sidewalks during the day, in total minutes?

1-15 minutes	53.33%
16-25 minutes	6.67%
25-35 minutes	20%
36-60 minutes	20%
60+ minutes	0%

4) What conditions along the Town streets/sidewalks are most important to you?

Pavement in good, firm condition	56.25%
Reasonable Crossing Times	25%
Planting Strips between street and walkway	6.25%
Wide Sidewalks	43.75%
Street trees for shady areas or additional landscape	6.25%
Curb ramps at every corner	0%

5) What conditions along Town streets/sidewalks keep you from walking more often?

Sidewalks/walkways in poor condition	37.50%
Inaccessible conditions/no curb ramps	37.50%
Afraid of motor vehicles/drivers	31.25%
Difficult or unsafe street crossings	25%
Destination is too far away	25%
Unattractive scenery/surroundings	0%
Getting around is too difficult	0%
Personal security/safety	0%
Takes too long to destination	18.75%

6) What conditions related to physical accessibility do you find to be the most difficult?

Lack of crosswalk stripes	35.71%
Lack of curb ramps	0%
Lack of connections to existing sidewalks	64.29%
Sidewalks/walkways in poor condition	28.57%
Intersections difficult to pass	14.29%
No pedestrian signals (stop/go)	28.57%
Sidewalks too narrow	21.43%

7) Please identify difficulties or constraints along routes you normally take. Identify the street first and then the prescribed issue (i.e. Main Street: Sidewalks, Does not connect with existing path system or Old Mammoth Road: Safety, uneven surface)

The following are the responses given per street:

<i>Street</i>	<i>Main Issues</i>	<i>Comments</i>
Frontage Road	Pedestrian Ramp	The pedestrian ramp from the Frontage Rd leads to a busy Main St. with no crosswalk.
Joaquin Road	Lack of Lighting	Lack of lighting makes night walking dangerous.
Lake Mary Road	Not Plowed	It needs to be plowed on a regular basis. There is a brand new path sitting under snow that was meant to be a safe place of travel up and down Lake Mary Rd. Instead you have to walk on the street in the winter.
Lupin Street	Lack of Lighting	Lack of lighting makes night walking dangerous.
Main Street	Lack of Connectivity and Not Plowed	No connection and not plowed
		During a normal winter sidewalks are not plowed (Old Mammoth Rd from Mammoth Creek Park to Main St)

Manzanita Road	Lack of Lighting	Lack of lighting makes night walking dangerous.
Meridian Boulevard	Narrow Sidewalks, Not Plowed, Poor Condition	Sidewalk is narrow and not cleared of snow
		Meridian by Eagle - not cleared in the winter so I can only use the path 6 months out of the year and I don't want to go in the street when it isn't clear.
		Lack of sidewalks, sidewalks are narrow.
		Hardly any sidewalks and what is there is in poor condition
		Not plowed and in bad shape
		During a normal winter sidewalks are not plowed (Meridian from ghetto to schools)
Mono Street	Lack of Lighting	Lack of lighting makes night walking dangerous.
Old Mammoth Road	Lack of Crossings	Easy access to and along Old Mammoth Road, but no direct access to Main Street
		Old Mammoth Road, south of Chateau near park: lack of road crossing and high rate of speed for vehicle traffic
All Streets	General	Trails are in need of repair and cleaning
		More connections
		There's dog poop on many sidewalks and all bike paths

- 8) If you are deaf or hard of hearing or travel with someone who is blind or has a visual disability, what problems have you had along the Town's sidewalks and pedestrian facilities? If these conditions do not apply to you, please write N/A in the box provided below.**

No responses received.

- 9) What suggestions would you have for improvements to physical accessibility or accommodations for persons with disabilities along the Town's sidewalks and pedestrian facilities?**

The following are the responses:

- More time to cross at crosswalks
- Wider sidewalks; some sidewalks are probably too steep
- Sidewalks that connect; Meridian is super inconsistent
- More sidewalks in general in residential areas
- Provide sidewalks or a bike lane with textured markings
- Build more sidewalks
- More and wider sidewalks; slow car traffic down
- Sufficient Ramps for easy access
- Better up keep
- Good pavement condition winter and summer
- Fix the broken cross walk lights on main st
- Wider, cleared sidewalks

10) Additional Comments:

- Use the frontage road along Main Street as a pedestrian boulevard by narrowing traffic to one lane, one direction and creating physical separation.
- Ensuring there is a sidewalk that is plowed along all of Main St. would be the biggest improvement. Not sure if this survey deals with bike paths, but fixing the dog poop problem would be biggest improvement there.
- Strongly against any additional sidewalks on side streets, keep on main streets only

Section 3.4: ADA Transition Plan Public Review and Comment Period

A public entity that employs 50 or more people is required to seek public input on its ADA Transition Plan. Beyond the legal requirements, such input is vital to assure that those affected by the Town's programs, services and facilities understand the scope and nature of Town's responsibilities for providing equal access to the public. As described in the previous section, the transition plan process has spanned several years, and considerable efforts to obtain public input have been undertaken during this period.

The issuance of this public input draft ADA Transition Plan should commence a more formal period of public review and participation. The notice of the issuance of such a draft should be advertised in local publications, and upon issuance, members of the public will be afforded a 30-day comment period to submit written comments. The draft ADA Transition Plan should be available in alternate formats, and written comments will be received in any alternative formats chosen by respondents. Members of the public also should be afforded the opportunity to make public oral comments about the ADA Transition Plan at a public hearing.

All public comments received should be incorporated in their entirety into a section of the final ADA Transition Plan. All public comments should be reviewed, analyzed and incorporated into the text of the final ADA Transition Plan as deemed to be appropriate.

Requests for copies of the ADA Transition Plan and public comments should be directed in writing to the Town of Mammoth Lakes Transition Plan Project, P.O. Box 1609, Mammoth Lakes, CA 93546. The ADA Transition Plan will be provided in various alternative formats upon written request.

Section 3.5: ADA Grievance Procedures

Introduction

The ADA states that a public entity is required to apprise the public of the protections against discrimination afforded to them by Title II of the ADA, including information about how Title II requirements apply to its particular programs, services and activities [28 C.F.R. § 35.106]. A public entity also is required to provide an opportunity for interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the development of policies and procedures that affect the implementation of an ADA transition plan by submitting comments and making specific recommendations.

A public entity that employs 50 or more persons is required by the ADA to adopt and publish grievance procedures providing for prompt and equitable resolution of complaints or grievances alleging any action that would be prohibited by Title II of the ADA. Recommended Town of Mammoth Lakes, Department of Public Work grievance procedure is described in the following section. Any person with a disability or any parent or guardian who represents a minor person with a disability, who believes that they have been the subject of disability-related discrimination on the basis of the denial of access to facilities, programs or services, may file a grievance or complaint.

Grievance Procedures and Instructions

Step 1: File a Grievance Form

The complainant should fill out the ADA Complaint / Grievance Form shown below, giving all of the information requested. The ADA Complaint / Grievance Form should be filed in writing with the Town of Mammoth Lakes, Department of Public Works within 60 days of the alleged disability-related discrimination. Upon request, reasonable accommodations will be provided in completing the form, or alternative formats of the form will be provided. The ADA Complaint / Grievance Procedure and Form may be obtained from and sent to the Town of Mammoth Lakes, Public Works Director.

Step 2: An Investigation is Conducted

A notice of receipt shall be mailed to the complainant by registered mail within five days of the receipt of the complaint or grievance. If necessary, the authorized Public Works Department representative may contact the complainant directly to obtain additional facts or documentation relevant to the grievance. If the complainant does not wish to be contacted personally, it should be indicated on the grievance form.

Step 3: A Written Decision is Prepared and Forwarded to the Complainant

A Department of Public Works Representative shall prepare a written decision, after full consideration of the grievance merits, no later than 60 days following the receipt of the grievance. A copy of the written decision shall be mailed to the complainant by registered mail no later than five days after preparation of the written decision.

Step 4: A Complainant May Appeal the Decision

If the complainant is dissatisfied with the written decision, the complainant may file a written appeal with either, at the complainant's option, the Town Manager or designee, no later than 30 days from the date of the mailing of the decision. The appeal must contain a statement of the reasons why the complainant is dissatisfied with the written decision, and must be signed by the complainant, or by someone authorized to sign on the complainant's behalf. A notice of receipt shall be mailed to the complainant by registered mail within five days of the receipt of the appeal. The decision of the Town Manager or designee shall be final.

The Town of Mammoth Lakes, Department of Public Works and Town Manager shall maintain the confidentiality of all files and records relating to grievances filed, unless disclosure is authorized or required by law. Any retaliation, coercion, intimidation, threat, interference or harassment for the filing of a grievance, or used to restrain a complainant from filing, is prohibited and should be reported immediately to the Director of Public Works or the Town Manager.

Town of Mammoth Lakes, Department of Public Works ADA Complaint / Grievance Form

Complainant: _____

Person Preparing Complaint (if different from Complainant): _____

Relationship to Complainant (if different from Complainant): _____

Street Address & Apt. No.: _____

City: _____ State: _____ Zip: _____

Phone: (____) _____ E-mail: _____

Please provide a complete description of the specific complaint or grievance:

Please specify any location(s) related to the complaint or grievance (if applicable):

Please state what you think should be done to resolve the complaint or grievance:

Please attach additional pages as needed.

☐ Please do not contact me personally.

Signature: _____ Date: _____

Return to: Town of Mammoth Lakes, Department of Public Works, Public Works Director, P.O. Box 1609,
Mammoth Lakes, CA 93546

Upon request, reasonable accommodation will be provided in completing this form, or copies of the form will be provided in alternative formats. Contact the Public Work Director at the Address above for more information.

Section 4: ADA Design Standards

Section 4.1: Introduction

The ADA Codes and Standards were developed as part of an extensive process to propose applicable guidelines, codes and standards as they relate to the accessibility of all facilities within the public right-of-way in the Town. The ADA Codes and Standards went through a total of three versions, with each reviewed and input provided by the TAC and ADA CAG.

The ADA Codes and Standards were developed to combine and resolve any conflicts between the Americans with Disabilities Act Accessibility Guidelines (ADAAG), published by the U.S. Architectural and Transportation Barriers Compliance Board in July 1991, and the California State Building Code, Title 24, Part 2, of the California Code of Regulation, 2013 edition. Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Rights-of-Way, published by the U.S. Architectural and Transportation Barriers Compliance Board in July, 2011, which has had two revisions since its initial release in 2001, also were considered, but not necessarily replicated, in the ADA Codes and Standards described in this section. In addition, all Town-approved policies and standards affecting accessibility in the public right-of way were included in the ADA Codes and Standards.

The ADA Codes and Standards described in this section are intended to apply to all construction undertaken with the Town's right-of way after the final approval of the ADA Transition Plan. The codes and standards would include all new development and all construction undertaken as part of the ADA Capital Implementation Plan included in **Section 6**.

Section 4.2: Applicable Reference Codes and Standards

The following codes and standards are referenced as applicable by law or statute. Nothing in these Town standards shall have the effect of reducing any specific requirements of the referenced standards (1) or (2), or any other codes or standards required by applicable law or statute. Should other new codes or standards become applicable law or statute after the adoption of these Town standards, such new codes or standards shall supersede these Town standards, but only to the extent that new codes or standards are more restrictive or exceed these Town standards.

- (1) **The Americans with Disabilities Act Accessibility Guidelines (ADAAG)**, published by the U.S. Architectural and Transportation Barriers Compliance Board in July 1991, binding regulatory law in 1992, with several revisions through July 1998. (Note: Some jurisdictions mistakenly use a revised edition of these standards dated September 1994; this edition was never approved and should NOT be used.) The ADAAG guidelines were written to apply to newly constructed places of public accommodation. The ADAAG is an appendix to Title III of the ADA. The technical standards of the ADAAG also provide a technical definition for accessible elements. These guidelines were not written to specifically apply to public facilities, which must provide equal access to people with disabilities to all programs and services of local and state governments. Therefore, while meeting the technical requirements of the ADAAG assures owners of places of public accommodation of full compliance with the ADA, such technical compliance may not be sufficient to provide full access to programs and services for government entities.
- (2) **California State Building Code, Title 24, Part 2**, of the California Code of Regulation, 2013 edition. These code requirements apply to any actual construction work within the public right-of-way at the time that the work is constructed, but the requirements of Title 24 are limited to the actual work being constructed and do not apply to adjacent areas beyond the construction limits.
- (3) **Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way**, published by the U.S. Architectural and Transportation Barriers Compliance Board on July 26, 2011, including additions

from the 2002 and 2005 drafts. These guidelines were recently out for public review and are used instead of the current ADAAG guidelines listed in (1). The guidelines have not been approved by the U.S. Department of Justice, but are represented to be the most current state-of-the-art with respect to accessibility in the public right-of-way. The guidelines also were written to apply to new construction.

- (4) **Standard Plans for Public Works**, dated March 2014, includes the Town's design standards, construction standards, and construction details. The Standard Plans supersede the CalTrans Standard Specification and Standard Plans.
- (5) **CalTrans Standard Specifications** and **CalTrans Standard Plans**, dated 2010, include design standards, construction standards, and construction details for the State of California. In the case of the Town's standards providing incomplete information, this manual is referenced for design and construction.

Section 4.3: Applicability of ADA Design & Construction Standards

1. New Development: All areas of newly designed and newly constructed facilities in the Town-regulated public right-of-way shall comply with these standards.

2. Additions in the Existing Public Right-of-Way: Each addition to an existing Town-regulated public right-of-way shall comply with the applicable provisions of these standards. Facilities offering a public service shall be included in following these applicable provisions. Where the addition connects with existing construction, the connection shall comply with "Alterations", as described in the next subsection.

3. Alterations in the Existing Public Right-of-Way: Where existing elements or spaces in the Town-regulated public right-of-way are altered, each altered element or space shall comply with the applicable provisions of these standards.

3.1 Exception: In alterations, where compliance with applicable provisions is technically infeasible, the alteration shall comply to the maximum extent feasible.

3.2 Prohibited Reduction in Access. An alteration that decreases or has the effect of decreasing the accessibility of a public right-of-way or site arrival points to buildings or facilities adjacent to the altered portion of the public right-of-way, below the requirements for new construction at the time that the alteration is prohibited.

4. Approval Procedures for Exceptions, Equivalent Facilitation and Technically Infeasible Conditions:

The Town of Mammoth Lakes, Department of Public Works shall adopt a written procedure for making all determinations of exceptions, equivalent facilitation, and technical infeasibility. Upon determination of an exception, equivalent facilitation, and technical infeasibility, such determination of the Department shall be final, except that any member of the public may appeal the determination, per the procedures outlined in the Town of Mammoth Lakes ADA Complaint/Grievance Procedure.

5. Dimensional Tolerances: All dimensions and numerical requirements contained in these standards are absolute and requirements have been derived taking into account construction practices and constraints, and no dimensional tolerances beyond the maximum or minimum dimensions are allowed, unless otherwise stated.

5.1 Advisory: It is advised that designers use numerical criteria in designs and specifications that are below the maximum or are above the minimum requirements stated in these standards, so that the final constructed improvements meet the stated requirements.

6. Inclusion and Incorporation into Existing Town of Mammoth Lakes Improvement Standards:

The intent of the listing of these standards is that all standards will be included and incorporated into the Town of Mammoth Lakes Design and Construction Standards, dated March 2014. Where parentheses follow a specific

standard, the number refers to the specific current Town Standard sections that correspond to the specific requirements and in which the new standards will be included or incorporated. Standard Town Drawings may also be referenced as part of these standards (Appendix D). Written requirements as included in these standards shall take precedence over any drawings should there be any discrepancies in the requirements.

Section 4.4: Sidewalk and Pedestrian Access Standards

4.1 Scope: Where sidewalks, corners or pedestrian access paths are provided adjacent to streets or roadways within the public right-of-way, they shall meet the requirements of this section.

4.2 Clear Width (*Town Standard Plans, Section 100-2, F,2-4*): Sidewalks shall be a minimum of six (6) feet clear of any obstruction where sidewalks are adjacent to a wall or building they shall be widened by at least one (1) foot.

4.2.1 Exception: Sidewalks on Main Street Shall be a minimum of ten (10) feet wide with a minimum of six (6) feet clear of obstructions.

4.2.2 Exception: Sidewalks in the North Village Main Pedestrian Corridor shall be a minimum of eight (8) feet wide and clear of obstructions.

4.3 Passing Space (*In Town Maintained Facilities, Town Standard Plans, Section 100-2, F,2-4 or Areas Not Town Maintained Facilities, Section 103-1*): Sidewalks shall be a minimum of six (6) feet clear of any obstruction where sidewalks are adjacent to a wall or building they shall be widened by at least one (1) foot. For areas not in Town Maintained facilities, the sidewalk may narrow to 4' for pedestrian ramps.

4.4 Cross Slope (*Town Standard Plans, Section 100-2, E, C*): The cross slope of the sidewalk shall be no more than two percent (2%) in either direction.

4.5 Running Slope (*No current Town Standard*): The running slope of the sidewalk shall not exceed the grade of the adjacent roadway or 1:20 (five percent), whichever is greater.

4.6 Level Areas on Continuous Slopes (*No current Town Standard*): For sidewalks with a running slope exceeding five percent for at least 400 feet, a 60-inch long landing with a maximum slope of two percent shall be provided for every 400 feet of the sidewalk length, except for roadway overpasses.

4.8 Curbs at Streets Adjacent to Sidewalks (*Town Standard Plans, Section 102-2, Pp. 1-4*): Curbs on the street side of sidewalks and corners shall be approximately vertical, with a height of at least four inches but no greater than eight inches.

4.8.1 Exception: In unique situation of difficult terrain, the Town, at its sole discretion, may authorize a reduced height of curb to resolve parking and driving issues.

4.9 Surfaces (**Concrete:** *Town Standard Plans, Section 004, Pp. 1-2*; **Pavement:** *Town Standard Plans, Section 006, Pp. 1-4*): The surface shall be either Portland cement concrete or asphalt concrete, and it shall be firm, stable and slip-resistant. Specific details on composition, construction, and strength are provided in the Town Standards.

4.10 Changes in Level (*No current Town Standard*): Changes in level up to 1/4 inch may be vertical and without edge treatment. Changes in level between 1/4 inch and 1/2 inch shall be beveled with a slope no greater than one horizontal to two vertical. Changes in level greater than 1/2 inch (13 mm) shall be accomplished by means of a ramp. Multiple changes in level shall be separated horizontally by at least 30 inches.

4.11 Gratings (*No current Town Standard*): If gratings are located in the sidewalk surface along a pedestrian access route or in the accessible portion of a curb ramp, they shall have spaces no greater than 1/2 inch wide in the direction of travel. If gratings have elongated openings, they shall be placed so that the long dimension is perpendicular to the direction of travel. Whenever possible, drainage inlets should be located outside of the crosswalk area, particularly the portion of the crosswalks that adjoin the accessible portion of curb ramps.

4.12 Protruding Objects (*No current Town Standard*): Protruding objects shall not reduce the clear width required for sidewalks. Objects with leading edges located between 27 inches above and 80 inches below the finish surface shall protrude no more than four inches horizontally into the pedestrian access route. Free-standing objects mounted on posts or pylons shall overhang pedestrian access routes no more than four inches when located between 27 inches above and 80 inches below the finish surface. Where a sign or other obstruction is mounted between posts or pylons and the clear distance between post or pylons is greater than 12 inches, the lowest edge of such sign or obstruction shall be located between 27 inches above and 80 inches below above the surface, and there shall be a bar or similarly detectable element 15 inches above the surface connecting the two posts or pylons.

4.13 Barrier Curbs at Drop-offs (*No current Town Standard*): Warning or barrier curbs shall be provided at the following locations. Abrupt changes in level at the edge of sidewalks, except between a sidewalk and an adjacent street, exceeding four inches in a vertical dimension, such as at planters or fountains located in or adjacent to sidewalks, shall be identified by curbs projecting at least six inches in height above the surface.

At bus stops, where a slope behind a sidewalk slopes toward the sidewalk, a barrier curb projecting at least six inches in height above the surface shall be provided to prevent water flow across the sidewalk.

Where the slope behind a sidewalk is greater than six (horizontal) to one (vertical) and the slope is away from the sidewalk, a barrier curb projecting at least six inches in height above the surface shall be provided for pedestrian safety. A retaining wall or fence may be provided in lieu of the required barrier curb.

4.14 Driveway Crossings (*No current Town Standard, Minimum Sidewalk Width Considered*): Where a sidewalk crosses a driveway, the minimum width of 72 inches and the maximum cross slope of 1:50 (2 percent) shall be provided for the entire width of the driveway. Driveway entries shall not be designed or used as curb ramps.

4.15 Rail Crossings (*No current Town Standard*): Where a sidewalk crosses rail systems at grade, the surface of the sidewalk shall be level and flush with the top of the rail at the outer edge and between the rails. Where a sidewalk crosses rail systems at grade, the horizontal gap at the inner edge of each rail shall be constructed to the minimum dimension necessary to allow passage of railroad car wheel flanges and shall not exceed 2½ inches (three inches for freight rails).

4.16 Stairs (*No current Town Standard*): To the maximum extent feasible, stairs shall not be constructed within the public right-of way.

4.16.1 Exception: If provided, steps or stairs shall provide 1.5 inch diameter handrails 34 inches to 38 inches above each nosing on both sides, with extensions at the top and bottom meeting all applicable portions of the California State Building Code, Chapter 11B. If provided, steps or stairs shall provide a two inch contrasting yellow color stripe at each tread and the upper approach of each staircase. The contrasting color stripe shall be yellow conforming to Federal Color No. 33538, as shown in Table IV of Standard No. 595B.

Section 4.5: Curb Ramp and Blended Transition Standards

5.1 Scope (*Town Standard, Section 103, Pp. 1-8*): Each corner of an intersection shall be provided with at least one curb ramp, typically oriented in the center of the curb return at each corner. Curb ramps shall conform to the requirements of this section. The Town provides various alternative to pedestrian ramps, although one curb ramp located at the center of the curb return at each corner or directional to the path of travel is preferred if technically feasible. Technical Infeasibility is based on the following intersection conditions:

1. A corner with a curb return radius that is so large that the crosswalks meet at the midpoint of the curve.
2. A corner where placing two curb ramps or flush landings would result in them being located outside the crosswalk markings, or would result in stop bars and/or stop signs or ramps placed too far back on the side street for driver safety or pedestrian safety.

3. An intersection that is skewed, such that two curb ramps or flush landings will not fit in the acute angle corners
4. An alteration, where the corner has retaining walls, buildings, signal poles and/or controller cabinets, utility poles or other barriers that are technically infeasible to relocate.
5. An intersection in which one street has an unavoidably steep grade, and a shared curb ramp or flush landing at the midpoint of the curb return may have less severe warp than a curb ramp or flush landing closer to the tangent of the steep street.
6. An intersection in an area of steep terrain, where both streets are flattened to allow for acceptable crosswalk slopes. It may be feasible to flatten a small intersection area and provide acceptable crosswalks leading to a shared ramp. Placement of a pair of curb ramps would necessitate a larger flattened area, resulting in steeper sidewalks between intersections.

5.1.1 Exception: Where pedestrian crossing in a specific direction is prohibited by a continuous raised median, barricade or sign, no curb ramp shall be provided. Where only one curb ramp is provided at a corner to serve only one direction of travel to an adjacent corner, the curb ramp shall be aligned and oriented parallel to the intended direction of travel.

5.2 Curb Ramp Types: Curb ramps shall be either perpendicular or parallel curb ramps, as these terms are defined in this section. Blended transitions shall not be constructed, unless specifically approved by the Director of Public Works.

5.3 Perpendicular Curb Ramps: Perpendicular curb ramps shall comply with the details described in this subsection, and shall have a running slope that cuts through the curb at right angles or meets the gutter grade break at right angles. For specific design requirements, please refer the Town Standard Plans, Section 103-2, Pp. 2,4,6.

5.3.1 Running Slope: The running slope of the main portion of the curb ramp shall be 1:12 (8.33 percent) maximum.

5.3.2 Cross Slope: The cross slope of the main portion of the curb ramp shall be no more than 1:50 (2%) in either direction.

5.3.3 Landing: A landing measuring 48 inches minimum by 48 inches minimum shall be provided at the top of the curb ramp, and shall be permitted to overlap other landings and clear spaces. Running and cross slopes of the landing shall be no more than 1:50 (2%) in either direction.

5.3.4 Flared sides: Flared sides with a slope of 1:10 (ten percent) maximum, measured along the curb line, shall be provided where a circulation path crosses the curb ramp.

5.3.5 Clear Width: The clear width of the main portion of the curb ramp, excluding flared sides, shall be 48 inches minimum.

5.3.6 Detectable Warnings: Detectable warning surfaces complying with Section 4.6 shall be provided for the full width of the main portion of the curb ramp or blended transition, with the front edge located approximately six inches behind the curb line.

5.3.7 Grooved Border: A 12-inch wide grooved border with 1/4 inch grooves approximately 3/4 inch on center shall be provided at the top of the main slope and at the side of each side slope.

5.3.8 Surfaces: Surfaces of curb ramps and landings shall comply with Section 4.4.9. Gratings, access covers, and other appurtenances shall not be located on curb ramps, landings, and gutter areas directly in front of curb ramps.

5.3.9 Changes in Level: Vertical changes in level greater than those described in Section 4.4.10 shall not be permitted on curb ramps, landings or gutter areas directly in front of curb ramps.

5.3.10 Gutter Slope: The counter slope of the gutter area or street at the foot of a curb ramp or landing shall be 1:20 (five percent) maximum.

5.3.11 Clear Space: Beyond the curb line toward the street, a clear space measuring 48 inches minimum by 48 inches minimum shall be provided within any marked crosswalk that may be present and located wholly outside of the parallel vehicle travel lane.

5.3.12 Obstructions: Curb ramps shall be located or protected to prevent their obstruction by parked cars.

5.4 Parallel Curb Ramps: Parallel curb ramps shall comply with the details described in this subsection, and shall have running slopes that are in-line with the direction of sidewalk travel. For specific design requirements, please refer the Town Standard Plans, Section 103-2, Pp. 2,3,5,6.

5.4.1 Running Slope: The running slope of each side slope shall be 1:12 (8.33 percent) maximum.

5.4.2 Cross Slope: The cross slope of each side shall be no more than 1:50 (2%) in either direction.

5.4.3 Clear Width: The clear width of each side slope shall be 48 inches minimum.

5.4.4 Landing: A landing measuring 48 inches minimum by 48 inches minimum shall be provided at the bottom of each ramp slope. Landing slopes shall be 1:100 (one percent) minimum and 1:67 (1.5 percent) maximum, with allowances for a construction variance of 1:200 (0.5 percent) in either direction.

5.4.5 Diverging Sidewalks: Where a parallel curb ramp does not occupy the entire width of a sidewalk, drop-offs at diverging segments shall be protected with a six inch curb or similar barrier.

5.4.6 Common Landing Width: Where two parallel curb ramps are located at a corner, the landing between the top of each side slope shall be 48 inches minimum.

5.4.7 Detectable Warnings: Detectable warning surfaces complying with Section 4.6 shall be provided for the full width of the lower landing between the side slopes of the curb ramp, with the front edge located approximately six inches behind the curb line.

5.4.8 Grooved Border: A 12-inch wide grooved border with 1/4 inch grooves approximately 3/4 inch on center shall be provided at the top of each side slope.

5.4.9 Surfaces: Surfaces of curb ramps and landings shall comply with Section 4.4.9. Gratings, access covers and other appurtenances shall not be located on curb ramps, landings and gutter areas directly in front of curb ramps.

5.4.10 Changes in Level: Vertical changes in level greater than 1/4 inch shall not be permitted on curb ramps, landings, or gutter areas directly in front of curb ramps. In some cases, Changes in level between 1/4 inch and 1/2 inch shall be beveled with a slope no greater than one horizontal to two vertical to accomplish an acceptable vertical change for curb ramps.

5.4.11 Gutter Slope: The counter slope of the gutter area or street at the foot of the lower landing shall be 1:20 (five percent) maximum.

5.4.12 Clear Space: Beyond the curb line toward the street, a clear space of 48 inches minimum by 48 inches minimum shall be provided within any marked crosswalk that may be present and located wholly outside the parallel vehicle travel lane.

5.4.13 Obstructions: Curb ramps shall be located or protected to prevent their obstruction by parked cars.

Section 4.6: Detectable Warning Standards

6.1 Scope: Where detectable warnings (truncated domes) are required by other sections of these standards, they shall comply with the requirements of this section.

6.2 Size and Location (*Town Standard, Section 103, Pp. 7*): Detectable warnings shall 2¼” deep with 1” of washed sand leveling courses, woven geotextile fabric and 6” of Class 2 Aggregate base. The detectable warning shall span the full width of the area where they are required.

6.3 Specifications (*Town Standard, Section 103, Pp. 7*): The detectable warning surface shall be prefabricated durable slip resistant surface and shall have in-line square grid pattern truncated domes with a diameter of nominal 0.9 in. (22.9 mm) at the base tapering to 0.4 in. (11.4 mm) at the top, a height of nominal 0.2 in. (5.08 mm), and a center-to-center spacing of 1.67 in. (59.7 mm) (2.35 in. center-to-center spacing on the diagonal.) Detectable warnings shall be a color selected by the Town and shall either be pavers or cast iron panels. The 0.2 inch height of domes shall be measured from the top of the highest point on the field slip resistant surface to the highest point on the top of the truncated dome. Detectable warning surfaces shall differ from adjoining walking surfaces in resiliency or sound on cane contact.

Section 4.7: Pedestrian Crossing Standards

7.1 Scope: All signalized intersections shall be provided with marked crosswalks as described in this section. Uncontrolled intersections may be provided with marked crosswalks as determined by the Director of Public Works. If provided, all marked crosswalks shall comply with the requirements of this section. Please, all standards are set either by CalTrans Standard Specification (CSS) or Manual on Uniform Traffic Control Devices (MUTCD).

7.2 Width: Marked crosswalks shall be 120 inches wide minimum, as measured between the striped lines.

7.2.1 Advisory: The width of marked crosswalks may be reduce to 96 inches wide, as measured between painted lines, as determined the Director of Public Works.

7.3 Color and Size: Crosswalk stripes shall be 12 inches wide, and white in color.

7.3.1 Exception: Crosswalks serving schools shall be yellow in color.

7.4 Advisory Cross Slope: The cross slope of the pavement within a marked crosswalk should be 1:50 (2 percent) maximum, measured perpendicular to the direction of pedestrian travel within the sidewalk. The Department of Public Works shall evaluate all intersections with marked crosswalks when pavement rehabilitation is planned and document the feasibility in changing the street grade to accommodate the 1:67 (1.5 percent) grade.

7.5 Running Slope: The running slope of the pavement within a marked crosswalk shall be 1:20 (five percent) maximum measured parallel to the direction of pedestrian travel in the crosswalk.

7.6 Pedestrian Signal Phase Timing: All pedestrian signal phase timing shall be calculated using a pedestrian walk speed of 4.0 feet per second maximum. The total crosswalk distance used in calculating pedestrian signal phase timing shall include the entire length of the crosswalk from the face of the curb to face of curb, or as specified by the current ADAAG or PROWAC.

7.7 Medians and Pedestrian Refuge Islands: Medians and pedestrian refuge islands in crosswalks shall be cut through level with the street or have curb ramps complying with Section 4.5. Where the cut-through connects to the street, edges of the cut-through shall be aligned with the direction of the crosswalk for a length of 24 inches minimum.

7.7.1 Width: The width of all cut-throughs shall be 48 inches minimum.

7.7.1.1 Advisory: Where feasible, the width of all cut-throughs shall be 60 inches.

7.7.2 Length: Where signal timing is not designed or intended for full crossing of all traffic lanes or where the crossing is not signalized, cut-through medians and pedestrian refuge islands shall be 72 inches minimum in length in the direction of pedestrian travel.

7.7.3 Detectable Warnings: Medians and refuge islands shall have detectable warnings complying with the section titled Detectable Warnings (Section 5.5). Detectable warnings at cut-through islands shall span

the full width of the cut-through and shall be separated by a 24-inch minimum length of walkway without detectable warnings.

7.8 Crosswalk Alignment: Marked crosswalks shall have straight alignment, with no change of direction between the terminal ends of the crosswalk.

Section 4.8: Accessible Pedestrian Signal Standards

8.1 Scope: Upon the written request from the public, an engineering study shall be conducted to determine if an accessible pedestrian signal (APS) should be installed. Where a pedestrian pushbutton is provided, it shall be integrated into the signal device and shall comply with the requirements of this section.

8.2 Types and Location of Accessible Pedestrian Signals (*No current Town Standard*): Accessible pedestrian signals (APS) shall be Pedestrian Activated Signal Control (PASC) - the APS accessibility features is incorporated into the PASC.

All PASC accessible pedestrian signal devices shall serve the nearest crosswalk in relationship to their installation site. The speakers of all APS devices shall be oriented toward the center of the crosswalk or the direction of travel to the maximum extent feasible. Where possible, multiple APS devices shall not be placed on the same pole.

8.3 Audible Walk Indication (*No current Town Standard*): Volume measured at 36" from the pedestrian's signal device shall be between 2 and 5 decibel (dB) above ambient noise level and responsive to ambient noise level change. Automatic volume adjustment in response to ambient traffic sound level should be provided up to a maximum volume of 89 dB.

8.4 Pedestrian Pushbuttons (*No current Town Standard*): Pedestrian pushbuttons shall be located 60 inches maximum from the pan of the ramp. To the maximum extent feasible, the control face of the pushbutton shall be installed to face the intersection and be parallel to the direction of the crosswalk it serves.

Pedestrian pushbuttons shall be mounted at a height of from 36 inches minimum to 38 inches maximum to the centerline above the lowest adjacent walking surface. The horizontal reach distance to activate the button shall be no more than 18 inches from the closest edge of the adjacent walking surface. A clear space measuring 30 inches wide by 48 inches deep shall be provided at each pushbutton and shall connect to or overlap the pedestrian path of travel.

Pedestrian pushbuttons shall be a minimum of 2 inches across in one dimension and shall contrast visually with their housing or mounting. Pedestrian pushbuttons shall require no more than 5 pounds of pressure to operate.

Section 4.9: Transportation and Vehicle Access Standards

9.1 Scope: Where new public transportation facilities are constructed or substantially altered within the Town-regulated right-of-way, they shall comply with the requirements of this section.

9.2 Location: Bus stops or other transit stops serving fixed transit routes shall be located on at least one pedestrian access route complying with the requirements of Section 4.4 for the pedestrian path of travel from the transit stop to the nearest four-way street intersection. Curb ramps located at the nearest four-way intersection or other locations along the pedestrian access route shall comply with the requirements of Section 4.5.

9.3 Bus Stop Pad (*Town Standard Plans, Section 113-2, Pp.1-3*): Bus stop boarding areas shall be 60 inches minimum parallel to the roadway, and 96 inches minimum perpendicular to the curb or roadway edge. Slopes shall not exceed 2% in any direction. Minimum dimensions are subject to other Town requirements.

9.4 Bus Shelter (*Town Standard Plans, Section 702-0, Pp. 1-4*): Where a shelter is provided at a transit stop, it shall be located along a pedestrian access route complying with Section 4.5, and it shall provide a minimum 30 inches by 48 inches clear space, not including benches, located completely beneath or inside the shelter. The bus shelter shall be 20'4" x 5'4", as stated in the Town Standard Plans. Additional construction details for bus shelter construction are included in the Town Standard Plans. When benches are provided, the bus shelter shall accommodate companion seating.

9.5 Curbs at Streets Adjacent to Sidewalks (*Town Standard Plans, Section 102-2, Pp. 1-4*): Curbs on the street side of the sidewalk along the required length of the transit stop shall be approximately vertical, with a height of at least five inches but no greater than eight inches.

9.6 Surface (**Concrete:** *Town Standard Plans, Section 004, Pp. 1-2*; **Pavement:** *Town Standard Plans, Section 006, Pp. 1-4*): The surface of the sidewalk along the required length of the transit stop shall be either Portland cement concrete or asphalt concrete, and it shall be firm, stable and slip-resistant. Refer to Town Standards for additional information.

Section 4.10: Street and Sidewalk Furnishings and Appurtenances Standards

10.1 Clear Space (*No current Town Standard*): Street and sidewalk furnishings shall have a 30 inch wide (measured parallel to the pedestrian travel direction) by 48 inch deep (measured perpendicular to the pedestrian travel direction) clear space in front of each portion used by a pedestrian and shall be connected to the sidewalk or pedestrian access route.

10.2 Facilities and Elements (*No current Town Standard*): Where drinking fountains, telephones, concession stands, kiosks, information counters or public toilet facilities are provided, they shall comply with all applicable portions of the California State Building Code, Chapter 11B.

10.3 Benches (*No current Town Standard*): The leading edge of benches and all similar sidewalk furnishings shall be set back 12 inches minimum from the required minimum width of the pedestrian access route and shall accommodate companion seating. Bench seats shall be 17 inches to 19 inches vertical from the adjacent walkway surface to the seat.

Section 4.11: Temporary Construction Standards

11.1 Scope: Where construction or other temporary conditions prohibit full access to pedestrian facilities with the Town-regulated right-of-way, an alternate pedestrian route shall be provided in compliance with the requirements of this section.

11.2 Location (*No current Town Standard*): To the maximum extent feasible, the alternate pedestrian route shall parallel the disrupted pedestrian route, on the same side of the street. Where access is not available on the same side of the street, the alternate pedestrian route may be located on the opposite side of the street and as long as all requirements of these standards are met.

11.3 Elements (*No current Town Standard*): The alternate pedestrian route shall include sidewalks and pedestrian access routes, curb ramps, pedestrian crossings and all other elements included in these standards.

11.4 Width (*No current Town Standard*): The alternate pedestrian route shall have a width of 48 inches minimum.

11.4.1 Exception: Where technical infeasibility exists, the alternate pedestrian route may have a width of 36 inches minimum.

11.5 Barricade Protection *(No current Town Standard)*: The alternate pedestrian route shall be protected with a solid barricade to separate alternate pedestrian route from any adjacent construction, drop-offs, openings or other hazards. Barricades shall be continuous, stable and non-flexible, and shall consist of a solid wall or fence with the bottom or lower rail 1-1/2 inches maximum above the walking surface, and the top of the fence, wall or upper rail 36 inches minimum above the walking surface. Barricade support members shall not protrude beyond the barricade face into the alternate pedestrian route. Barricades shall be of a contrasting color, with white preferred.

11.6 Signs *(No current Town Standard)*: Signs complying with California Building Code Section 1117B.5 shall be provided at both the near side and the far side of the intersection preceding a disrupted pedestrian path of travel route, with appropriate wording to guide pedestrians to the alternate pedestrian path of travel route.

Section 14.12: Building Entrances

12.1 Minimum Number: Entrances are required to be accessible by providing a minimum passage width of 32 inches at a point and 36 inches continuously. Such entrances shall be connected by an accessible route to public transportation stops, to accessible parking and passenger loading zones, and to public streets or sidewalks if available. They shall also be connected by an accessible route to all accessible spaces or elements within the building or facility.

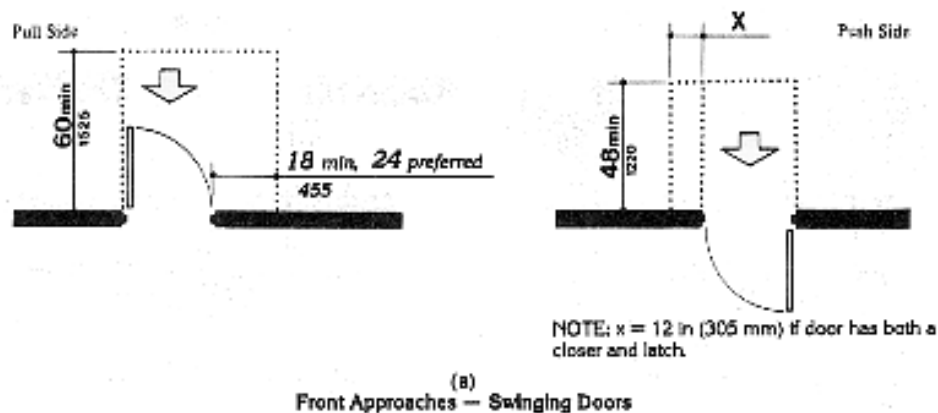
12.2 Service Entrances: A service entrance shall not be the sole accessible entrance unless it is the only entrance to a building or facility.

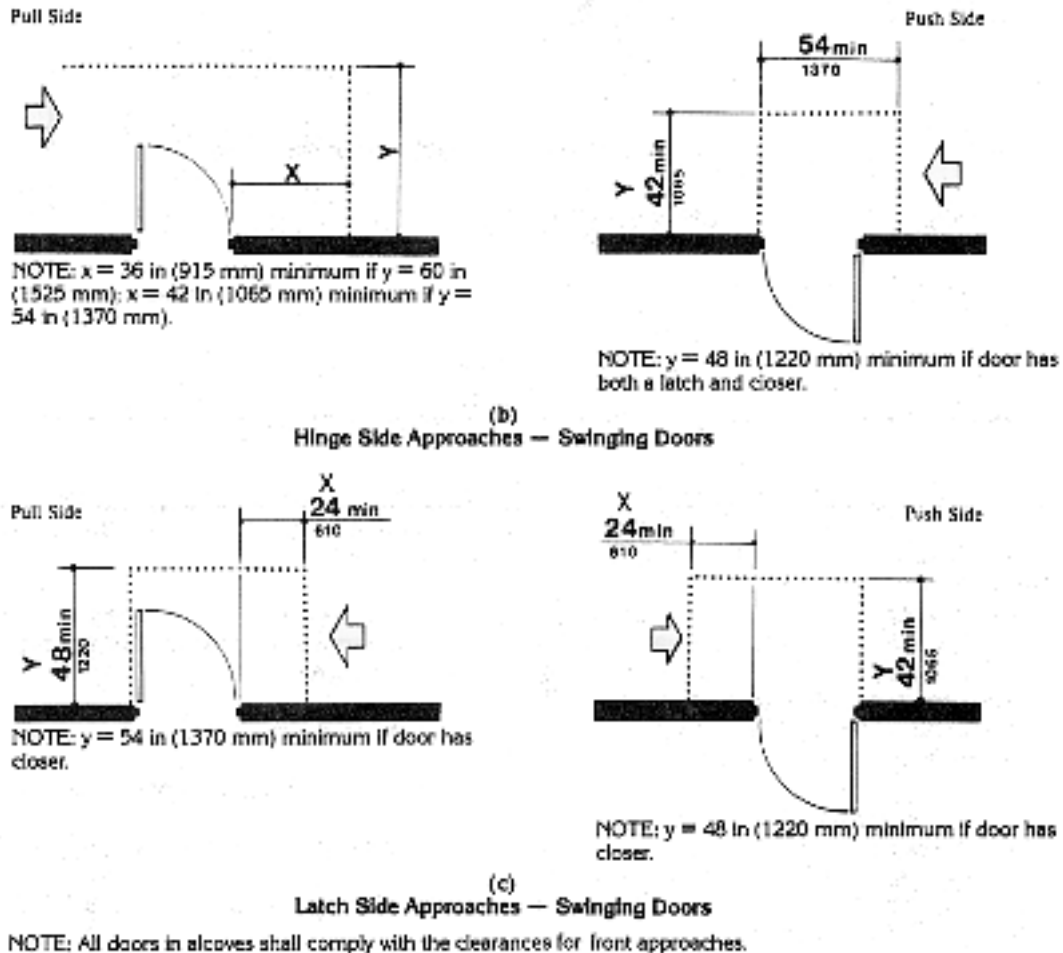
Section 4.13: Path of Travel and Doorways

13.1 Scope: For entrances into buildings, the following section outlines the requirements set by the Town.

13.2 Clear Width: Doorways shall have a minimum clear opening of 32 in (815 mm) with the door open 90 degrees, measured between the face of the door and the opposite stop

13.3 Maneuvering Clearances at Doors: Minimum maneuvering clearances at doors that are not automatic or power-assisted shall be as shown. The floor or ground area within the required clearances shall be level and clear.





13.4 Thresholds at Doorways: Thresholds at doorways shall not exceed 1/2 in (13 mm). Sliding doors shall not be used for required path of travel locations. Raised thresholds and floor level changes at accessible doorways shall be beveled with a slope no greater than 1:2

13.5 Door Hardware: Handles, pulls, latches, locks, and other operating devices on accessible doors shall have a shape that is easy to grasp with one hand and does not require tight grasping, tight pinching, or twisting of the wrist to operate. Lever-operated mechanisms, push-type mechanisms, and U-shaped handles are acceptable designs. When sliding doors are fully open, operating hardware shall be exposed and usable from both sides. Hardware required for accessible door passage shall be mounted no higher than 48 in (1220 mm) above finished floor.

13.6 Door Closers: If a door has a closer, then the sweep period of the closer shall be adjusted so that from an open position of 70 degrees, the door will take at least 3 seconds to move to a point 3 in (75 mm) from the latch, measured to the leading edge of the door.

13.7 Door Opening Force: The maximum force for pushing or pulling open a door shall be as follows:

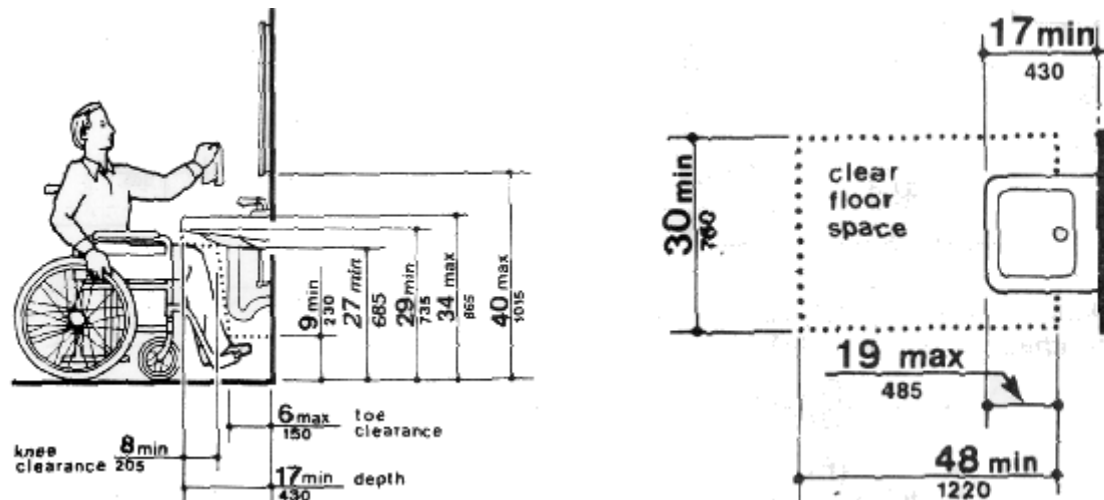
- (1) Fire doors shall have the minimum opening force allowable by the appropriate administrative authority.
- (2) Other doors.
 - (a) interior hinged doors: 5 lbf (22.2N)
 - (b) sliding or folding doors: 5 lbf (22.2N)

These forces do not apply to the force required to retract latch bolts or disengage other devices that may hold the door in a closed position.

4.14 Lavatories and Mirrors

14.1 Scope: The following requirements shall apply to lavatory fixtures, vanities, and built-in lavatories.

14.2 Height and Clearances: Lavatories shall be mounted with the rim or counter surface no higher than 34 in (865 mm) above the finish floor. Provide a clearance of at least 29 in (735 mm) above the finish floor to the bottom of the apron. Knee and toe clearance shall comply with Fig. 31.



14.3 Clear Floor Space: A clear floor space 30 in by 48 in (760 mm by 1220 mm) shall be provided in front of a lavatory to allow forward approach. Such clear floor space shall adjoin or overlap an accessible route and shall extend a maximum of 14 in (485 mm) underneath the lavatory (see above figure).

14.4 Exposed Pipes and Surfaces: Hot water and drain pipes under lavatories shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories.

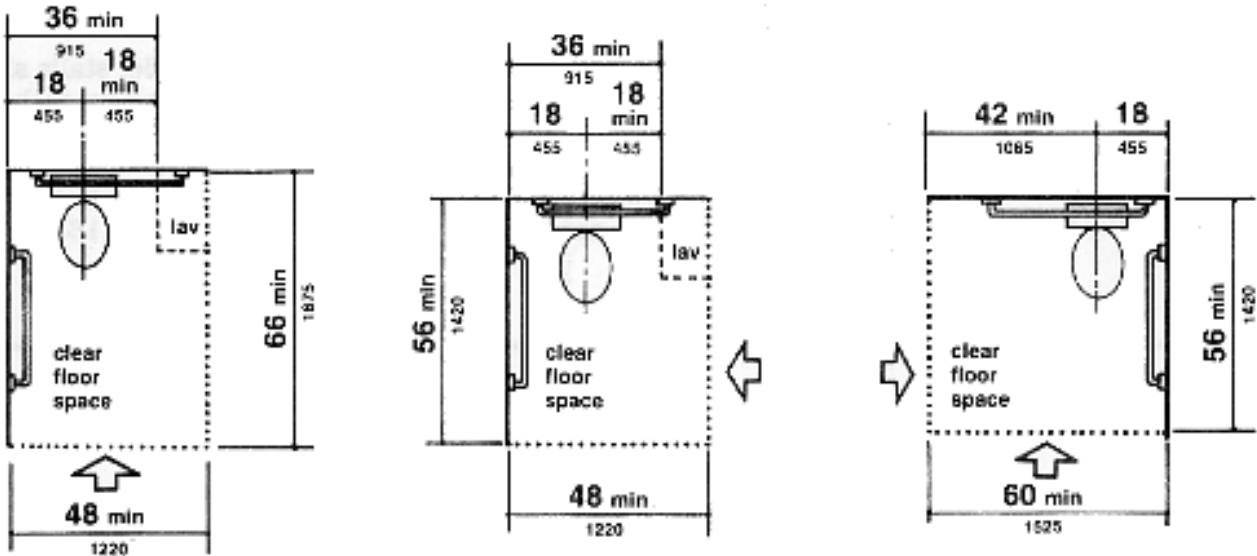
14.5 Faucets: Lever-operated, push-type, and electronically controlled mechanisms are examples of acceptable designs. If self-closing valves are used the faucet shall remain open for at least 10 seconds.

14.6 Mirrors: Mirrors shall be mounted with the bottom edge of the reflecting surface no higher than 40 in (1015 mm) above the finish floor.

Section 4.15: Bathrooms and Bathroom Stalls

15.1 Scope: The following section details the design requirements set for accessible bathrooms.

15.2 Clear Floor Space: Clear floor space for water closets not in stalls shall comply with the following figures. Clear floor space may be arranged to allow either a left-handed or right-handed approach.

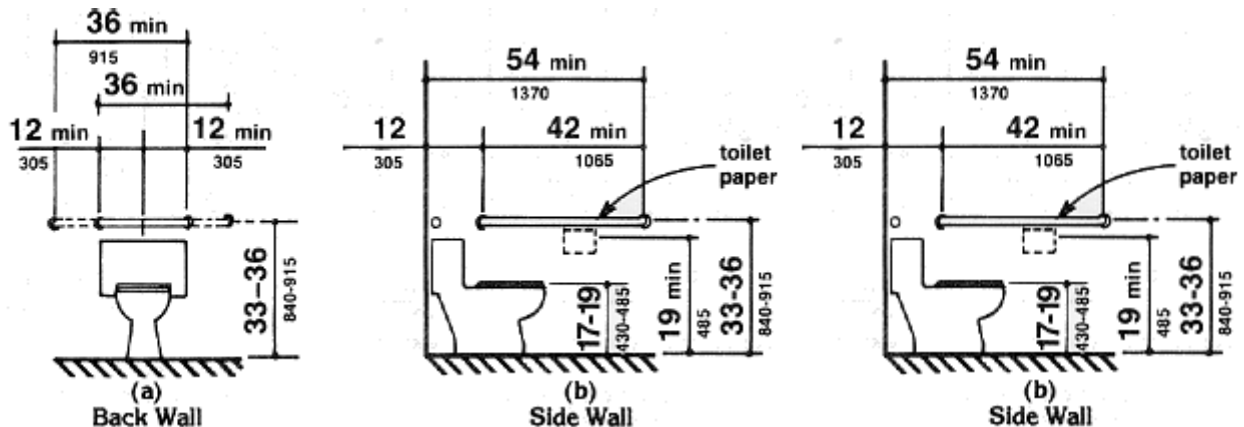


15.3 Height: The height of water closets shall be 17 in to 19 in (430 mm to 485 mm), measured to the top of the toilet seat. Seats shall not be sprung to return to a lifted position.

15.4 Doors: Toilet stall doors, including door hardware, shall comply with 4.13. If toilet stall approach is from the latch side of the stall door, clearance between the door side of the stall and any obstruction may be reduced to a minimum of 42 in (1065 mm).

15.5 Toe Clearances: In standard stalls, the front partition and at least one side partition shall provide a toe clearance of at least 9 in (230 mm) above the floor. If the depth of the stall is greater than 60 in (1525 mm), then the toe clearance is not required.

15.6 Grab Bars: Grab bars for water closets not located in stalls shall comply with the following figures. The grab bar behind the water closet shall be 36 in (915 mm) minimum.



15.7 Flush Controls: Controls for flush valves shall be mounted on the wide side of toilet areas no more than 44 in (1120 mm) above the floor.

15.8 Dispensers: Toilet paper dispensers shall be installed within reach, between nineteen (19) inches to forty-two (42) inches and not blocked by the grab bars. Dispensers that control delivery, or that do not permit continuous paper flow, shall not be used.

Section 5: Inventory Methodology and Findings

Section 5.1: Purpose and Summary of the Inventory Effort

The purpose of the inventory effort was to show a baseline of existing pedestrian facilities in the Town of Mammoth Lakes' public right-of-way and buildings providing a public service. This data will be used to analyze existing conditions and will be used to improve pedestrian facilities and to comply with ADA and Title 24 requirements and Town approved policies.

TOML has a wide variety of facilities within the public right-of-way. These facilities include streets and roadways, trail systems, vehicular and pedestrian bridges, underground and above-ground utilities, vehicular and pedestrian signal systems, signage systems, on-street parking facilities, sidewalks with curb ramps at intersections, improved planting strips, buffers, and pedestrian activity areas, unimproved open spaces or natural areas and buildings accessible to the general public. The goal of the overall project is to optimize the pedestrian experience and to provide safe and usable pedestrian facilities for all pedestrians in TOML, and to assure compliance with all federal, state, and local regulations and standards.

In April 2011, the process of surveying pedestrian facilities was undertaken to document the existing conditions within the public right-of-way under the jurisdiction of the Town of Mammoth Lakes. Surveying used in this section, refers to visiting the particular location by our TOML Senior Public Works Inspector to obtain measurements, dimensions, gradients and other visual determinations as appropriate depending on the particular location. A review of the survey process are listed below:

- Approximately 100 miles of roadways were traveled and surveyed to document physical conditions along the roadways.
- The inventory focused on roadways within the Town's jurisdiction and on those roadways serving governmental, public service, and commercial uses.
- For roadways surveyed, the Town documented two-lane or four-lane roads and sidewalks (when placed on one side or both sides of the road) within the Town jurisdictional limits.
- Approximately 150 street corners were surveyed, and measurements were taken for a variety of dimensions and gradients.

In 2007, the process of surveying buildings owned and operated by the Town of Mammoth Lakes were reviews. The Building Inspector documented existing conditions by obtaining measurements, dimensions, gradients and other visual determinations as appropriate depending on the facility. A final and detailed list of the findings are included in the appendix and listed in the proposed projects.

Section 5.2: Inventory Methodology

The methodology for field surveying for the ADA Transition Plan was originally described in the *Draft Inventory Methodology*, dated July 16, 2007. Field Surveying began in April 2011 by our Public Works Inspector to collect detailed measurements and other data within the Town's public right-of-way. All data for intersections and sidewalks were collected using a handheld gps device and data was collected/uploaded in the County of Mono's GIS System, a partnering agency with the Town of Mammoth Lakes.

Collection procedures for sidewalk segments and intersections were made at exact locations. Collection for buildings' current conditions included a detailed analysis per room of unmet conditions set by ADA standards. The duties of the inspector and building official included:

- Traveling to intersections and sidewalk segments in the Town's jurisdiction
- Traveling to buildings owned or operated by the Town to provide a public service

- Visually inspect, measure, and record observations using a calibrated level (SmartLevel), a 25-foot tape measure and a GPS unit
- Make judgments as to what to do in unusual conditions
- Represent the Town of Mammoth Lakes while in the field by working professionally, observing safety precautions, and treating members of the public politely

Section 5.3: ADA Terminology

Cross Slope: The slope that is perpendicular to the direction of travel.

Crosswalk: That part of a roadway at an intersection that is included within the extensions of the lateral lines of the sidewalks on opposite sides of the roadway, measured from the curb line or, in the absence of curbs, from the edges of the roadway or, in the absence of a sidewalk on one side of the roadway, the part of the roadway included within the extension of the lateral lines of the sidewalk at right angles to the centerline.

Curb: A vertical or rolled transition from the roadway to the sidewalk or adjoining area.

Curb Line: A line at the face of the curb that marks the transition from the roadway to a sidewalk or planting strip between the sidewalk and the gutter or roadway.

Curb Ramp: A sloping pedestrian way, intended for pedestrian traffic, which provides access between a walk or sidewalk to a surface located above or below an adjacent curb face.

Detectable Warning: A surface feature built in or applied to walking surfaces or other elements to warn of hazards on a circulation path.

Driveway: A vehicular path serving a single parcel of private property.

Facility: All or any portion of structures, improvements, elements, and pedestrian or vehicular routes located on a site or in a public right-of-way.

Public Right-of-Way: Land or property owned by a public entity and usually is acquired for or devoted to transportation and/or pedestrian purposes.

Ramp: A sloping portion of a walkway with a running slope exceeding 5%.

Running Slope (Grade): The slope that is parallel to the direction of travel expressed as a ratio of rise to run. In the public right-of-way, this is usually called grade, and is expressed in percent.

Sidewalk: That portion of a public right-of-way between the curb line or lateral line of a roadway and the adjacent property line that is improved for use by pedestrians.

Sidewalk Ramp: See Curb Ramp.

Section 5.4: ADA Data Collection Items

Intersection: Both the north/south and east/west streets comprising the intersection.

Corner: NE, SE, SW and NW. (Note: All corners will be referred to by one of these compass points.)

Ramp Orientation: The direction will be assigned within the nearest 5 degrees.

Surface Types: Options include Domes, Grooves, Other, or Not Applicable

Dome Type: Options include Plastic, Pavers, Other, or Not Applicable

Center Slope: Main slope of the curb ramp or level landing in percent adjacent to and perpendicular to the street

Center/Left/Right Ramp Width: Width of the curb ramp or pan. A pan or level landing exists when there is a lack of vertical separation between the sidewalk and the street.

Left/Right Slope: Whether a side slope or parallel slope was present, and if present, the slope of each sloping side or flare parallel to the street in percent.

Entry Groove: Whether a 12" grooved border around all sides was present

Curb Height: Height of the curb from the sidewalk to the existing roadway

Signal: Whether light signals were present at any or all crossings.

Crosswalk: Whether crosswalks were present at any or all crossings.

Button Height: Height of button allowing the pedestrian to alert traffic of their crossing or to alert the lighting signal to schedule the pedestrian's crossing

Crosswalk X-Slope: Cross slope of the main slope of the curb ramp or level landing, parallel to the street. The cross slope is perpendicular to the main slope of a curb ramp.

Condition: Current state of the crosswalk at prescribed location. The following was used as a guide to the scale:

- *Very good:* Newly built or resurfaced and distress free.
- *Good:* Smooth Surface with little to no cracking.
- *Fair:* Serviceable with moderate cracks beginning to occur, but does not affect walking or wheelchair access (less than one-half inch gaps)
- *Poor:* Same problems as fair but worse; affect walking or wheelchair access (more than one-half inch gaps)
- *Very poor:* Major problems with sidewalk gaps causing substantial impairment to pedestrian travel.

Obstructions: The total number of fixed (immovable without construction, for example utility poles) and non-fixed (movable features such as benches) obstacles on an existing sidewalk, if present. Obstacles may include utility poles, street furniture, gaps, tree limbs and roots and fire hydrants. These obstacles were only recorded if they decreased the travel path width to less than 36 inches or reduced the height clearance to less than 80".

Notes: Additional comments offered by the inspector

Photo: Visual images of intersection

Section 5.5 Inventory Findings

All survey finding are contained with the County-wide GIS System and excel sheets. The use of these two programs allows the Town to prepare various summary reports, whether for individual intersection or a roadway segment, as well as other data statistics. The data in the excel sheets may be made available to the general public and a series of maps illustrating the intersection deficiencies can be seen below.

Types of Ramps:

Parallel or Curbed: 77.5%
Perpendicular: 11.25%
Trail: 11.25%

Intersection Statistics:

Total number of intersections surveyed: 70
Total number of corners: 158

Corner Statistics:

Percentage of intersections with crosswalks: 49%
Percentage of all intersections with pedestrian signals: 10%

Curb Ramp Statistics:

Number of curb ramps surveyed: 158

Percentages of gutter slopes at curb ramps (5% maximum allowed):

Less than or equal to 2%: 50%
Greater than 5% and less than 7%: 25%
Greater than 7%: 25%

Percentages of main slopes on curb ramps (8.33% maximum allowed):

Less than or equal to 8.33%: 87.5%
Greater than 8.33% and less than 10%: 6.25%
Greater than 10%: 6.25%

Percentages of cross slopes on curb ramps (2% maximum allowed):

Less than or equal to 2%: 46%
Greater than 2% and less than 3%: 22%
Greater than 3%: 32%

Percentages of beveled lip height on curb ramps (no lip preferred, ½" max.):

No lip (sloped): 90%
0.25": 1%
0.50": 4%
0.75": 0%
1.00+": 5%

Percentages of widths of curb ramps (48" minimum allowed):

Greater than 48": 88.0%
Not Specified: 12%

Percentages of entry grooves on curb ramps (taken from left side since it was documented a primary curb ramp)

Curb ramps with grooved border: 71%
Curb ramps without grooved border: 29%

Percentages of curb ramps with truncated domes

Without truncated domes: 52%
With truncated domes: .48%

Roadway / Sidewalk Survey Statistics

Total miles of roadway: approx. 120 lane miles

Presence of sidewalks

Roadways segments with sidewalks on both sides of roadway: 55.7%

Roadways segments with partial sidewalks on either side of roadway: 42.4%

Roadways segments without sidewalks on either side of roadway: 1.9%

Sidewalk widths:

Greater than 8 feet wide: 47.3%

Greater than 6 feet wide: 35.3%

Greater than 4 feet wide: 15.3%

Less than 4 feet wide: 2%

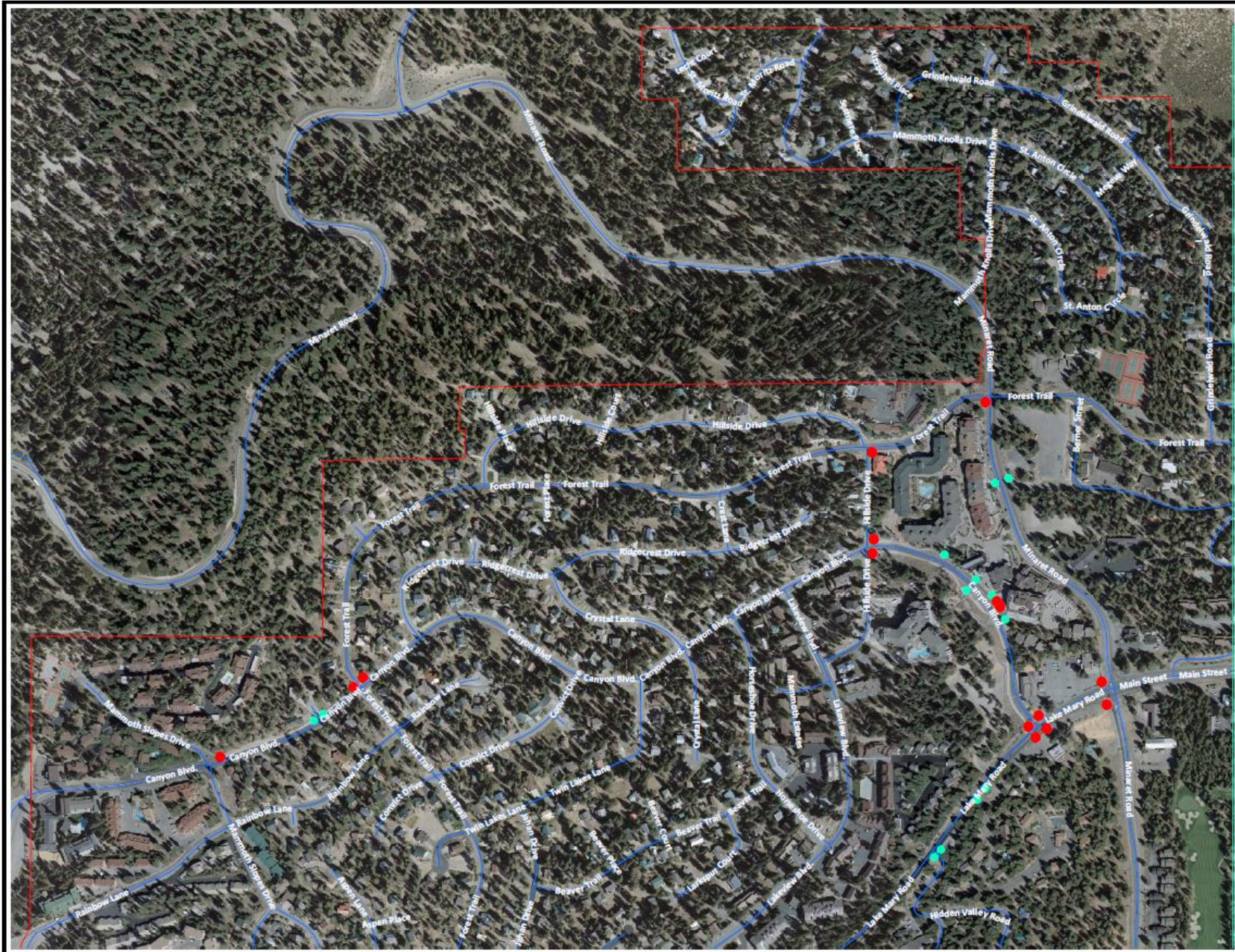
Average sidewalk width, when present: 94 inches (7'–10")

Town Owned or Operated Buildings

Total of facilities: 22 facilities including public restrooms

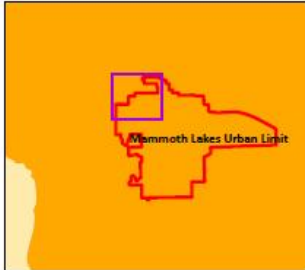
Total of facilities serving the general public: 10

Number of facilities not in compliance: 9



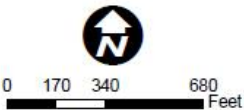
DOCUMENTED ADA RAMPS IN MAMMOTH LAKES

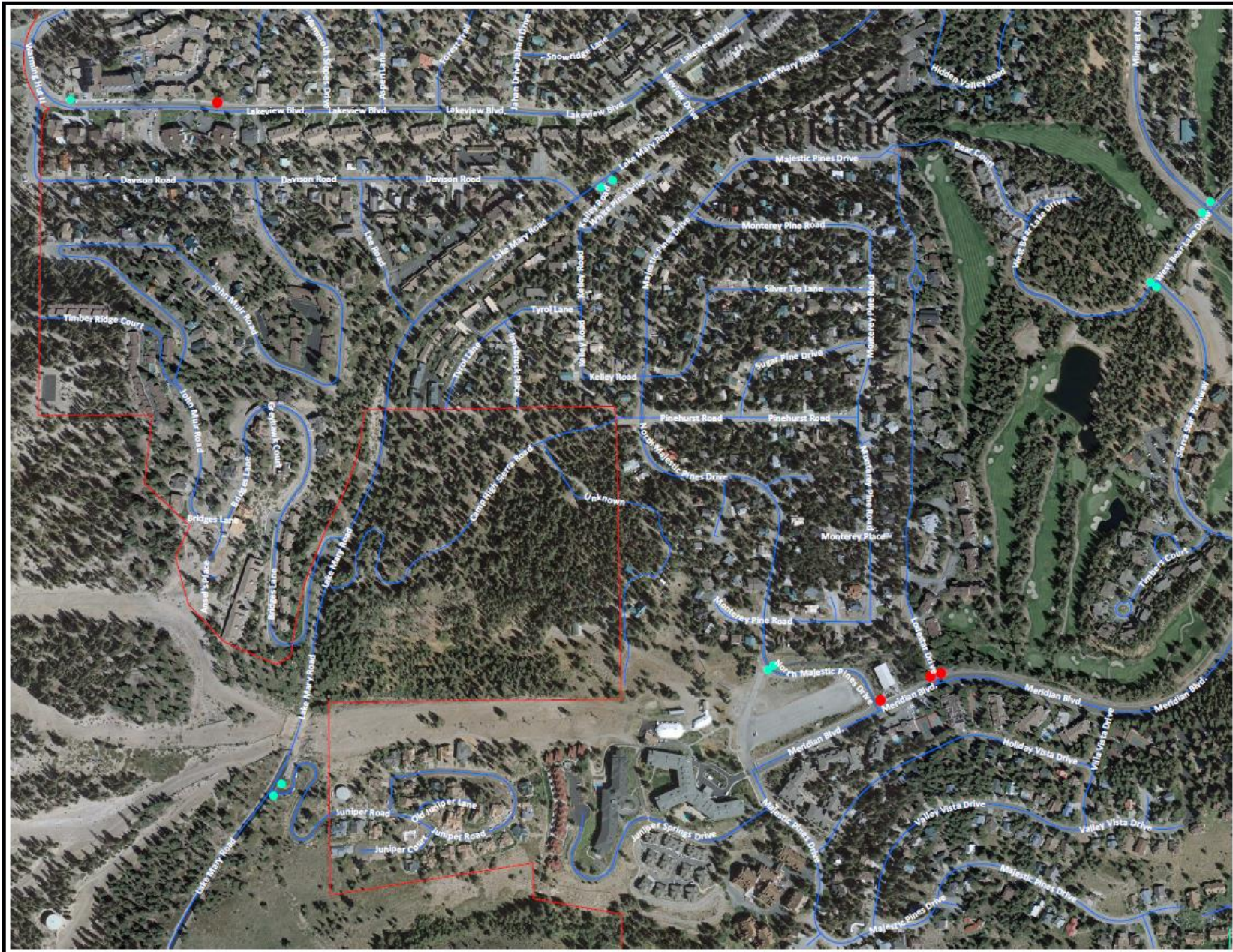
Map A-1



Legend

- Noncompliant Ramps
- Compliant Ramp
- Streets
- Urban Limit

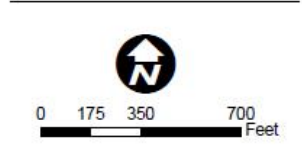


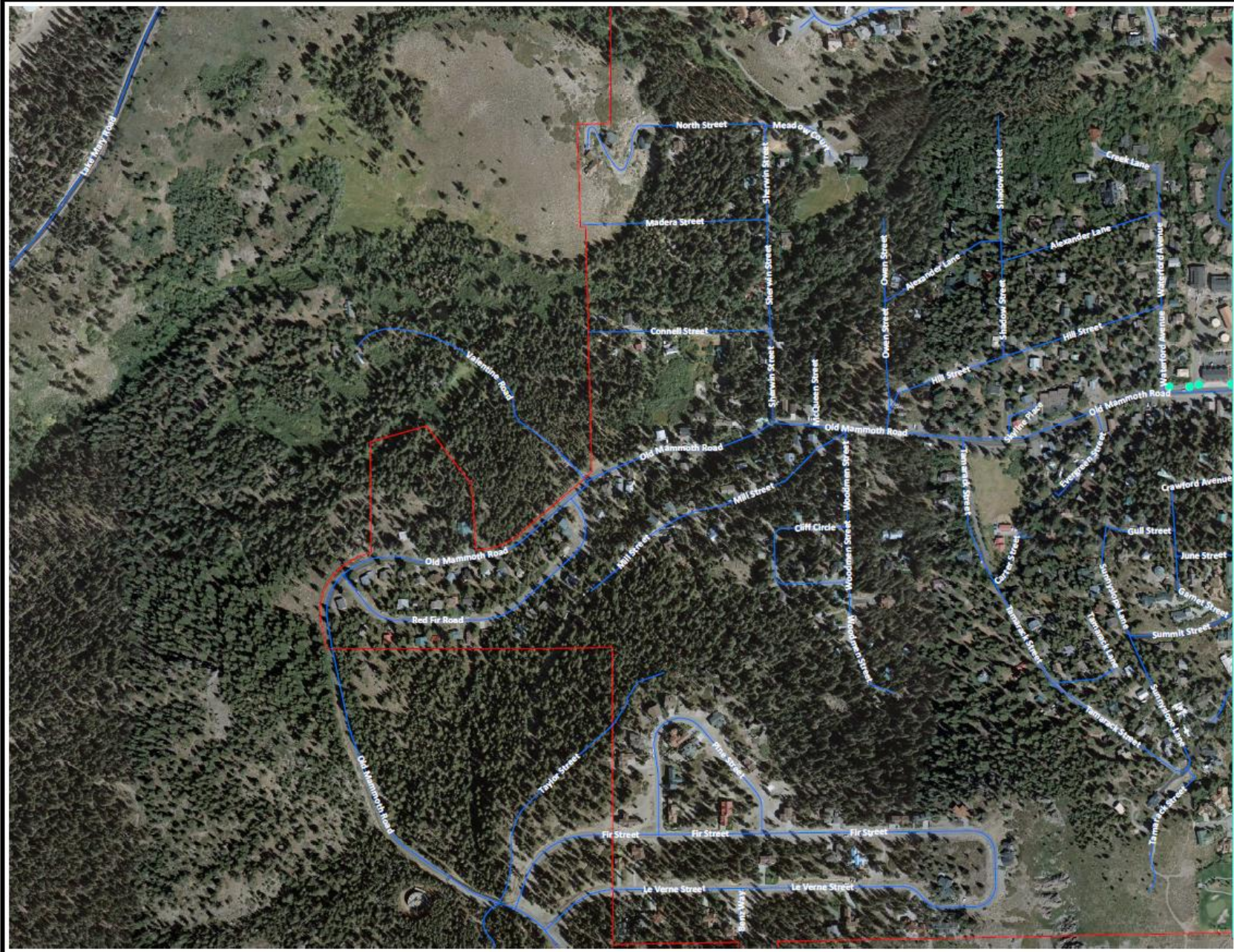


DOCUMENTED ADA RAMPS IN MAMMOTH LAKES Map A-2



- Legend**
- Noncompliant Ramps
 - Compliant Ramp
 - Streets
 - Urban Limit

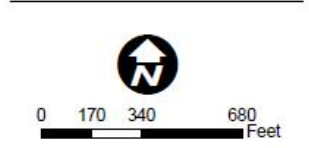




DOCUMENTED ADA RAMPS IN MAMMOTH LAKES Map A-3

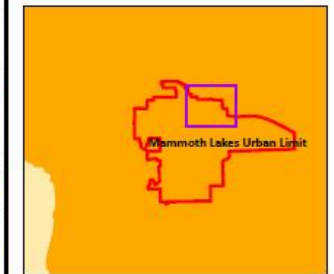


- Legend**
- Noncompliant Ramps
 - Compliant Ramp
 - Streets
 - Urban Limit



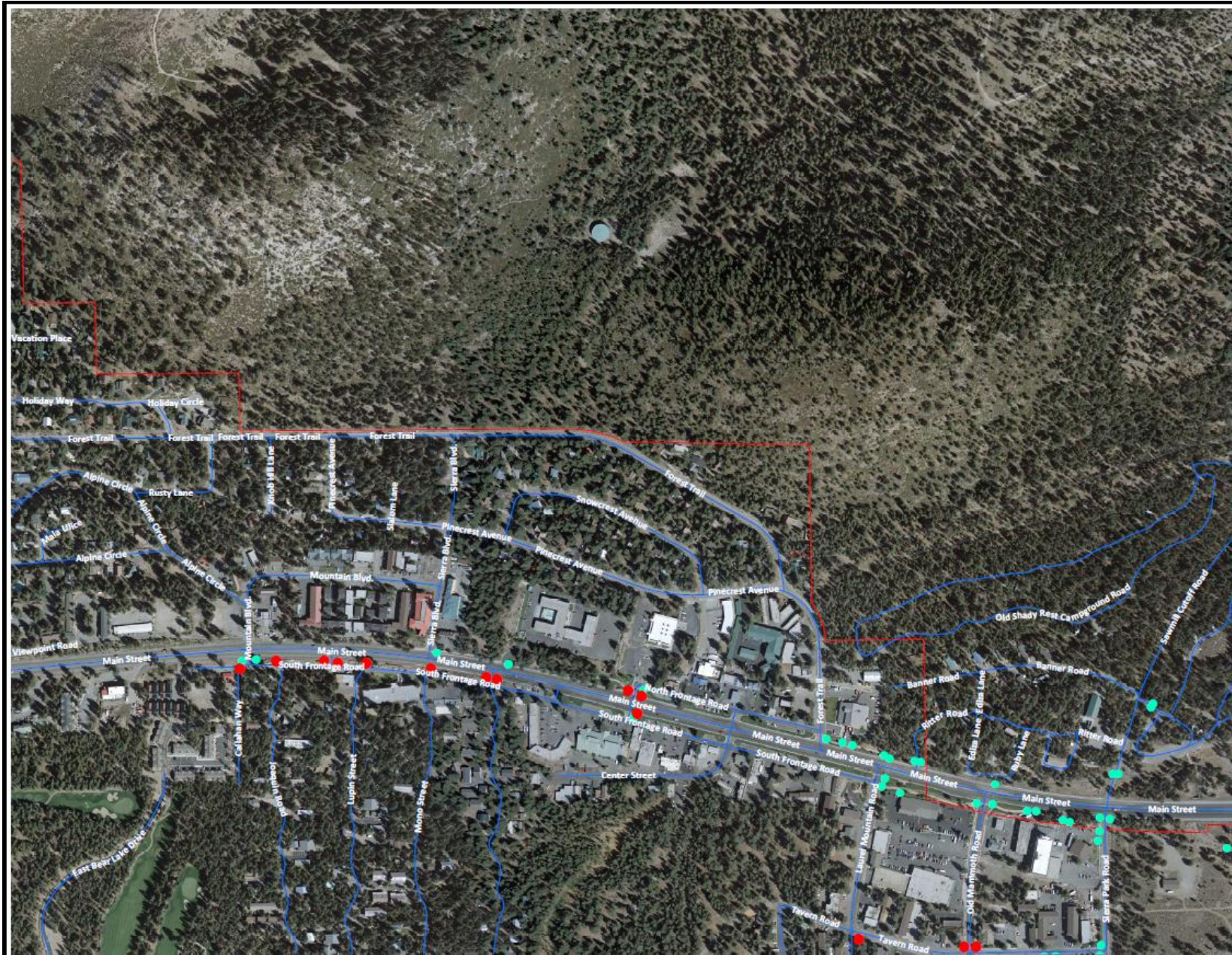
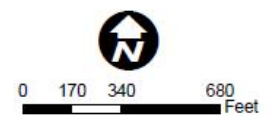
DOCUMENTED ADA RAMP IN MAMMOTH LAKES

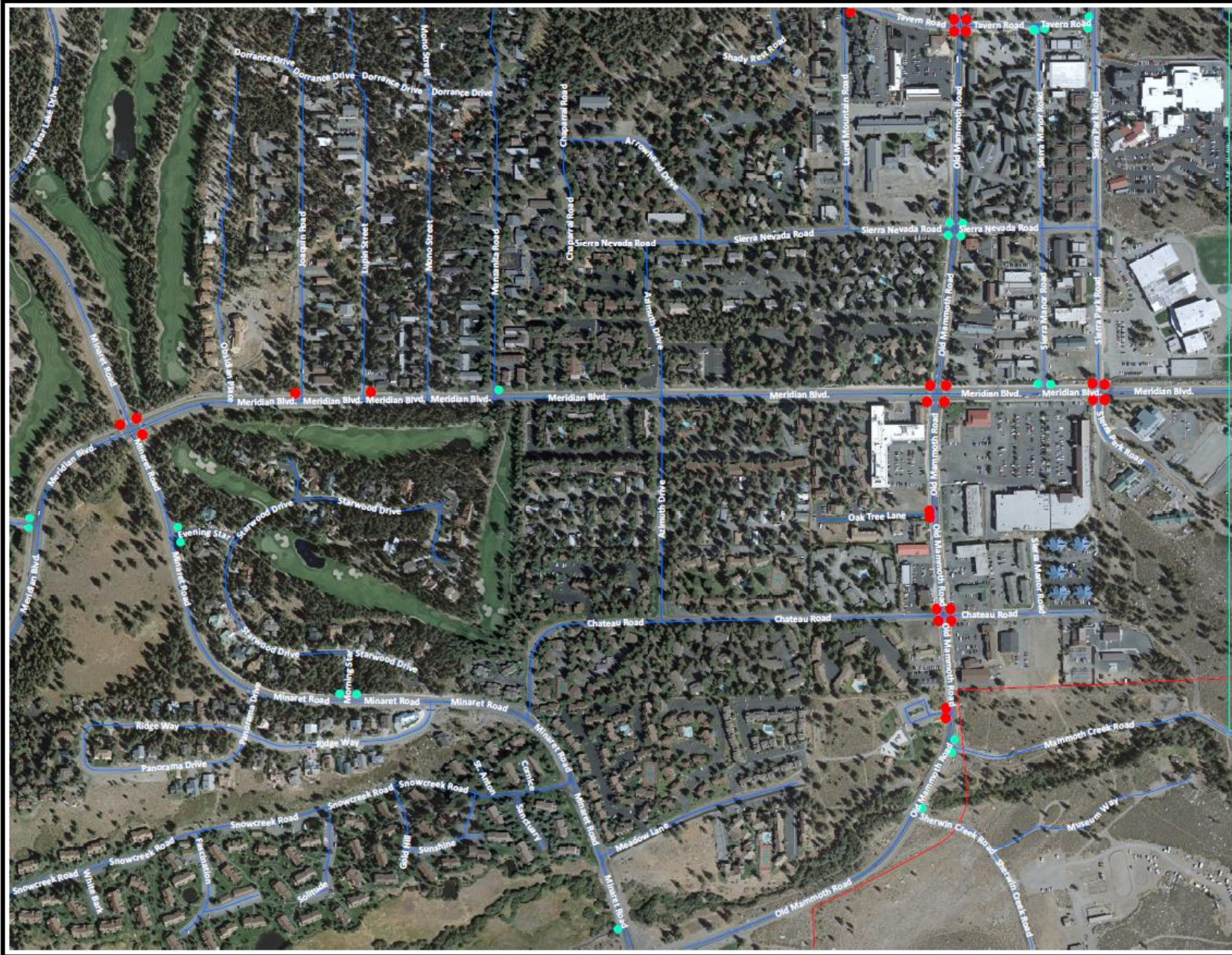
Map B-1



Legend

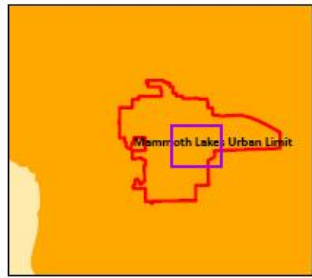
- Noncompliant Ramps
- Compliant Ramp
- Streets
- Urban Limit





DOCUMENTED ADA RAMPS IN MAMMOTH LAKES

Map B-2



- Legend**
- Noncompliant Ramps
 - Compliant Ramp
 - Streets
 - Urban Limit





DOCUMENTED ADA RAMPS IN MAMMOTH LAKES Map B-3

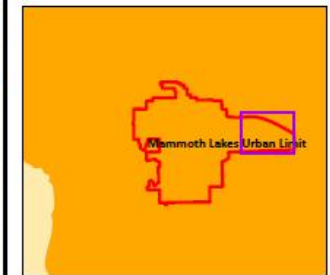


Legend

- Noncompliant Ramps
- Compliant Ramp
- Streets
- Urban Limit



DOCUMENTED ADA RAMPS IN MAMMOTH LAKES Map C-1



Legend

- Noncompliant Ramps
- Compliant Ramp
- Streets
- Urban Limit



Section 6: ADA Capital Implementation Plan

Section 6.1: Introduction

The ADA Implementation Plan has been developed as the final step in determining the extent of Town-operated and other participants' projects necessary to implement the ADA Transition Plan within the Town's public right-of-way and areas assessable to the public.

Types of projects included can be categorized as follows:

- Curb ramp, sidewalk and intersection retrofit projects, included with street overlay or other street or sidewalk construction projects.
- Curb ramp, sidewalk and intersection retrofit projects deemed essential for mitigation of barriers based upon the finalized ADA Transition Plan.
- Curb ramp, sidewalk and intersection retrofit projects, in conjunction with construction by private parties.
- Curb ramp construction or replacement projects based upon resident request.
- Street and sidewalk construction or retrofit projects planned for the improvement of overall pedestrian facilities.
- Pedestrian signals if provided as part of new projects.
- Roadway widening projects.
- Building retrofit projects deemed essential for public services

A number of existing and potential programs and funding sources for capital improvement projects are described in this section. These programs include on-going Town-sponsored capital improvement and maintenance programs, as well as specific projects and funding sources allocated in the transportation improvement plans. The ADA Improvement Plans is envisioned as one that will utilize, to the maximum extent possible, existing and prospective funding programs and sources. The basis of plan is recommended to include specific goals for construction and accessibility improvements. While specifying certain location and scope of work, the plan is also intended to serve as a conceptual plan whereby the extent and goals of future projects can be evaluated prior to preparing detailed cost estimates. Once an overall scope of work and its financial impact is established, annual projects can be finalized and the exact number of specified improvements can be set as project goals.

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The ADA Capital Implementation Plan includes a detailed and prioritized list of approximately 34 potential project locations and items of work, for input and review from the Town and the public. This implementation plan, which targets higher priority uses, anticipates a 10- to 20-year implementation period to achieve compliance with program accessibility requirements. Additional ADA work, such as new construction and additional curb ramps beyond the minimum program access requirements will continue beyond the timeframe identified above.

Section 6.2 Extent of Required ADA Work

The extent of work included in the ADA Transition Plan would include the types of capital improvements that should be made to intersections, streets, sidewalks and buildings. The final extent of work included in the plan should be based on the overall review process that will include review and recommendations of all basic elements by Town staff and other selected reviewers, including the community at the final public meeting. The general types and extent of ADA work that is required for the Town to "transition" into compliance with the programmatic access requirements of Title II of the ADA are included in this section.

It is recommended that most capital improvements be “comprehensive” in their approach. A comprehensive approach refers to making a series of related improvements at each particular location of work in an effort to bring the entire location into compliance with the applicable ADA Design Standards. For example, at a typical 4-way signalized intersection, the extent of work should include not only the construction of curb ramps at each corner, but it would also include removing accessibility barriers along the pedestrian route from any public use leading to the curb ramps, and installing accessible audible pedestrian signals, crosswalk striping; accessible islands, if required; and appropriate signage. It is probable that some capital improvement projects may, to a lesser degree, include only specific elements that represent physical barriers that need to be removed at a particular location, or that are specifically funded by an existing program.

The typical extent and scope of work that are recommended for the most common types of capital improvements, listed from most to least comprehensive, is shown below:

- (1) Complete ADA retrofit of signalized 4-way intersection: 8 new curb ramps, 2 per corner (unless infeasible due to existing conditions such as utility conflicts or geometry); new complying sidewalk paving to meet existing sidewalks and other sidewalk improvements to provide access to public uses along the path of travel; new audible pedestrian signals with push buttons; and crosswalk striping (if not existing, including removal and replacement of crosswalk striping where in poor condition) for all crossing directions where crosswalks are required by the ADA Design Standards. The scope may include new islands with cut-throughs or curb ramps at corners, if required by the standards or at the design engineer’s discretion.
- (2) Complete ADA retrofit of controlled intersection: either 4 or 8 new curb ramps, 1 or 2 per corner (depending on existing conditions such as utility conflicts or geometry); and crosswalk striping for all crossing directions where crosswalks are required by the ADA Design Standards; new complying sidewalk paving to meet existing sidewalks and other sidewalk improvements to provide access to public uses along the path of travel. The scope may include providing new islands with cut-throughs or curb ramps at corners, if required by the standards or at the design engineer’s discretion.
- (3) Complete ADA retrofit of signalized T-intersection: 6 new curb ramps with 2 per corner, except only one at each “top” of each T (unless infeasible due to existing conditions such as utility conflicts or geometry); new audible pedestrian signals with push buttons; and crosswalk striping (if not existing, including removal and replacement of crosswalk striping where in poor condition) for all crossing directions where crosswalks are required by the ADA Design Standards; new complying sidewalk paving to meet existing sidewalks and other sidewalk improvements to provide access to Priority 1 uses along the path of travel. Scope may include providing new islands with cut-throughs or curb ramps at corners, if required by the standards or at the design engineer’s discretion.
- (4) Complete ADA retrofit of existing Parks and Recreation bathrooms including accessible path of travel, turning radius requirements, utility height changes, and sink/toilet modifications.
- (5) Installation of new audible pedestrian signals with push buttons and crosswalk striping (if not existing, including removal and replacement of crosswalk striping where in poor condition) for all crossing directions where crosswalks are required by the ADA Design Standards.
- (6) Partial ADA retrofit at 4-way intersection, single-family residential area: 4 new curb ramps (1 per corner); crosswalk striping for at all signalized or stop-controlled intersections, for crossing directions where a crossing is not prohibited.
- (7) Partial ADA retrofit at T-intersection, single-family residential area: 2 new curb ramps to cross main street at one location of T-intersection, and at least one and preferably two new curb ramps to cross secondary street.
- (8) One or more new single curb ramp where other curb ramps at the intersection comply.
- (9) Renovation of an existing curb ramp to remove hazardous conditions.
- (10) Installation of a new curb, gutter and concrete sidewalk (installation of sidewalk on a case-by-case basis)
- (11) Renovation of an existing curb ramp to add detectable warnings (truncated dome panel).
- (12) Miscellaneous sidewalk or other walkway widening and leveling.
- (13) Selected sidewalk and bus pad pavement as required for transit access (installation on a case-by-case basis).

- (14) Complete ADA retrofit of existing buildings, focusing on accessible path of travel, parking requirements and accessible bathrooms. This money is contingent based on upgrades needed by the facility and grant funding as it becomes available.

This list only serves to assist in project planning purposes and is an attempt to categorize the general extent of work at different locations through the Town.

Section 6.3: ADA Implementation Plan – Goals and Objectives

Implementation Based on Location and Use

Town policies should provide for the prioritization of curb ramp installations based upon use and geographical criteria, as described in this section. While these criteria are reasonable for high priority curb ramp installations, the ADA Transition Plan will expand these priorities so that capital improvement projects forming the ADA Implementation Plan should be similarly prioritized to determine which projects should be undertaken first. These basic priorities are described below.

Priority (1): State and local governmental and public use facilities

These areas are typically located along major pedestrian corridors, arterial streets, or collector streets. The final exact locations of work should be determined after a detailed review of the inventory data. Included are those locations within the public right-of-way that abut or serve public and governmental agencies and offices, and these generally include the following uses, in the recommended order of priority:

- (1) State and local governmental buildings located within the Town,
- (2) Public hospitals, health clinics, medical clinics, mental health clinics & therapy centers,
- (3) Public schools, including in the following order, but not limited to: community colleges; high school, junior high and elementary school programs with magnet programs for children with disabilities; and all other schools.
- (4) Public housing projects and public homeless shelters,
- (5) Police neighborhood service centers,
- (6) Service sites of disability organizations, and
- (7) Employment training agency facilities.

Priority (2): Public accommodation facilities

These areas include locations along routes to school, transit stops, senior centers, or proximity to community facilities and transit. The final exact locations of work should be determined after a review of the inventory data. These projects should include those areas deemed to fall within the criteria established by the ADA for programmatic access to public and commercial services expected to serve persons with disabilities, and they generally include the following uses, in the recommended order of priority:

- (1) Private hospitals, doctors' offices, and medical and mental health offices,
- (2) Town parks,
- (3) Senior facilities,
- (4) Rehabilitation facilities,
- (5) Major shopping malls,
- (6) Major employment sites,
- (7) Supermarkets,
- (8) Large housing complexes,
- (9) Retail strip centers.

Priority (3): Projects based on other capital improvement plans

These types of ADA/accessibility projects would be associated with other capital improvement projects instituted for various reasons. An example would be streetscape improvement projects recommended as part of the Town's

Pedestrian Master Plan, generally consisting of curb ramp and pedestrian crossing improvements necessary to meet the ADA standards and re-constructed at locations recommended in the plan. Another example would be a possible retrofit of existing Town facility, such as a public pool or recreational center.

Priority (4): Other locations

These areas are those within the public right-of-way that abut or serve places of public accommodations which are privately owned, including, but not limited to, the following uses, in the recommended order of priority:

- (1) Small housing complexes,
- (2) Single-family residential areas,
- (3) Industrial areas,
- (4) Areas not included in any of the above groups.

Overall Consideration for Each Priority: Citizen Requests

The Town should operate a program of citizen requests for constructing curb ramps, installing pedestrian signals, and providing other accessibility improvements. Generally, requests for improvements would come from community members with disabilities who wish to access shopping areas, medical facilities, bus stops, transportation, and other facilities or areas to accommodate their activities of daily living.

When requests would come into the Department of Public Works, an evaluation for construction or reconstruction should be undertaken. If a curb ramp is requested, the evaluation consists of the requested curb ramp and the entire intersection at which the curb ramp is located. Any existing curb ramp is evaluated for usability and safety in order to determine the usable path of travel through that intersection. If modifications to buildings are requested, the evaluation consists of a path of accessibility throughout the building as well as other improvements such as bathrooms, etc.

Implementation Based on Condition

Town policies should also utilize some basic considerations and evaluation factors when determining whether an element within the public right-of-way is suitable for construction or reconstruction. In an ADA Transition Plan, these factors are usually referred to as “conditions” because they are based on the physical condition of an existing intersection, corner, curb ramp, or facility. These factors should also be used for consideration when determining the priority of a specific item within a priority group or category list.

The most critical conditions and remedies could be generally described according to the following conditions, in the recommended order of priority:

- (1) Conditions where no curb ramps or sidewalks currently exists to provide accessibility to the pedestrian path of travel,
- (2) Conditions where existing curb ramps or sidewalks have unsafe characteristics that may cause a trip and fall,
- (3) Conditions where existing curb ramps or sidewalks do not meet current federal and state accessibility standards.

Conditions set for curb ramps are as followed:

For existing curb ramps, more detailed conditions that need to be remedied on a case-by-case basis could be generally described according to the following conditions, in the recommended order of priority:

- (1) Vertical displacements of curb ramps,
- (2) Main slopes greater than 8.3%,
- (3) Ramp width less than 48”,
- (4) Side flared slopes greater than 10%,
- (5) Pan or landing cross-slopes greater than 2%,
- (6) Gutter slopes greater than 5%,
- (7) Common landings less than 48”,
- (8) Detectable warning surfaces missing,

- (9) Curb ramp lips not flush,
- (10) Curb ramp not aligned with crosswalk, where present
- (11) Curb ramp blocked by cars or other obstructions,

For existing curb ramps, it is also possible that some conditions in slight or moderate non-compliance may be given lower priority than other conditions. These could include:

- (1) Main slopes greater than 8.3%, but less than 10%.
- (2) Side flared slopes greater than 10%, but less than 12%.
- (3) Pan or landing cross-slopes greater than 2%, but less than 3.5%.
- (4) Gutter slopes greater than 5%, but less than 10%.
- (5) Curb ramp lips not flush, but less than 1/2".
- (6) Ramp widths less than 48", but greater than 36".

Conditions set for facility improvements are as followed:

For existing facilities, the conditions that need to be remedied will be evaluated on a case-by-case basis. The following is the recommended order of priority:

- (1) Accessible path of travel to the building
- (2) Minimum Doorway
- (3) Accessible Bathrooms
- (4) Lavatories and sinks

For a detailed list of requirements per each item, refer to Section 14.12 to Section 14.15 of this ADA Transition Plan.

The cost to upgrade curb ramps is between \$3,500 and \$5,000 each. Project specific budgets will be developed to include required improvements for facilities and to incorporate these improvements into the Capital improvement Plan.

Section 6.4: Types of Projects and Funding Sources

There are a number of existing and potential programs and funding sources for capital improvement projects included in the ADA Capital Implementation Plan. These programs are described in this section.

On-Going Capital Improvement Programs

These programs are operated by or coordinated with Town of Mammoth Lakes on an on-going, annual basis. The extent of funding levels may be fixed or may vary yearly. These programs include the following:

1) Street Saver Program

The Town's Program identifies curbs, gutters and sidewalks that are in need of repair or replacement and develops a priority list for their inclusion into the maintenance program. Street Saver software has been produced by Metropolitan Transportation Commission in Oakland California and is used by hundreds of towns and cities throughout the Western United States. The software takes input from manual inspections, then analyzes and categorizes roadways and trails, giving each one a maintenance priority depending on its intended use. The Program has two facets: permanent replacement and temporary repair.

2) Pavement Maintenance Program (Street Overlay, Micro surfacing and Chip Seal Projects)

The Town operates an annual pavement maintenance program for overlaying streets with new asphalt or improvements that increase the asphalt life. Federal court judgments (most notably Kenney v. Yerusalem, PA.) have required that curb ramps be installed along sidewalks adjacent to street overlays, and the Town has and continues to construct numerous curb ramps as a part of these projects. If the ramps are not included in the paving project, the noncomplying ramps should be reconstructed prior to pavement treatment.

3) Caltrans Construction Projects

Caltrans construction and renovation of roadways and facilities along State highways within the incorporated Town typically includes new curb ramps and other accessibility-related improvements. While the Town does not directly manage these projects, it coordinates locations and details of the work with Caltrans. Currently, all the sidewalks on Highway 203 are owned by the Town of Mammoth Lakes through an encroachment permit.

4) Private Developer Construction Projects adjacent to the Town Right-of-Way

There is typically private construction throughout the incorporated Town that has direct impact on improvements within the Town's right-of-way. As a condition of the approval of a building permit, Contractors are typically required to construct or improve the sidewalk, including curb ramps, directly adjacent to the subject property. For larger projects, developers also may be required to construct intersections complete with traffic signals. All new public accommodation projects shall be in compliance with the ADA.

A renewed training effort for plan checkers and inspectors is recommended to assure that the full potential of the ADA Transition Plan is realized.

5) Building Retrofit or Facility Updates

The Town maintains a series of facilities within the Town limits and other recreational sites. As modifications are made to facilities, the federal court requires improvements for an accessible path of travel, accessible bathrooms, and other considerations including utility height, elevation changes and construction materials. The PROWAC and ADAAG are essential for assisting in the review and design option of existing facilities to come into compliance.

APPENDIX A: PRIORITIZED PEDESTRIAN CURB RAMP PROJECTS

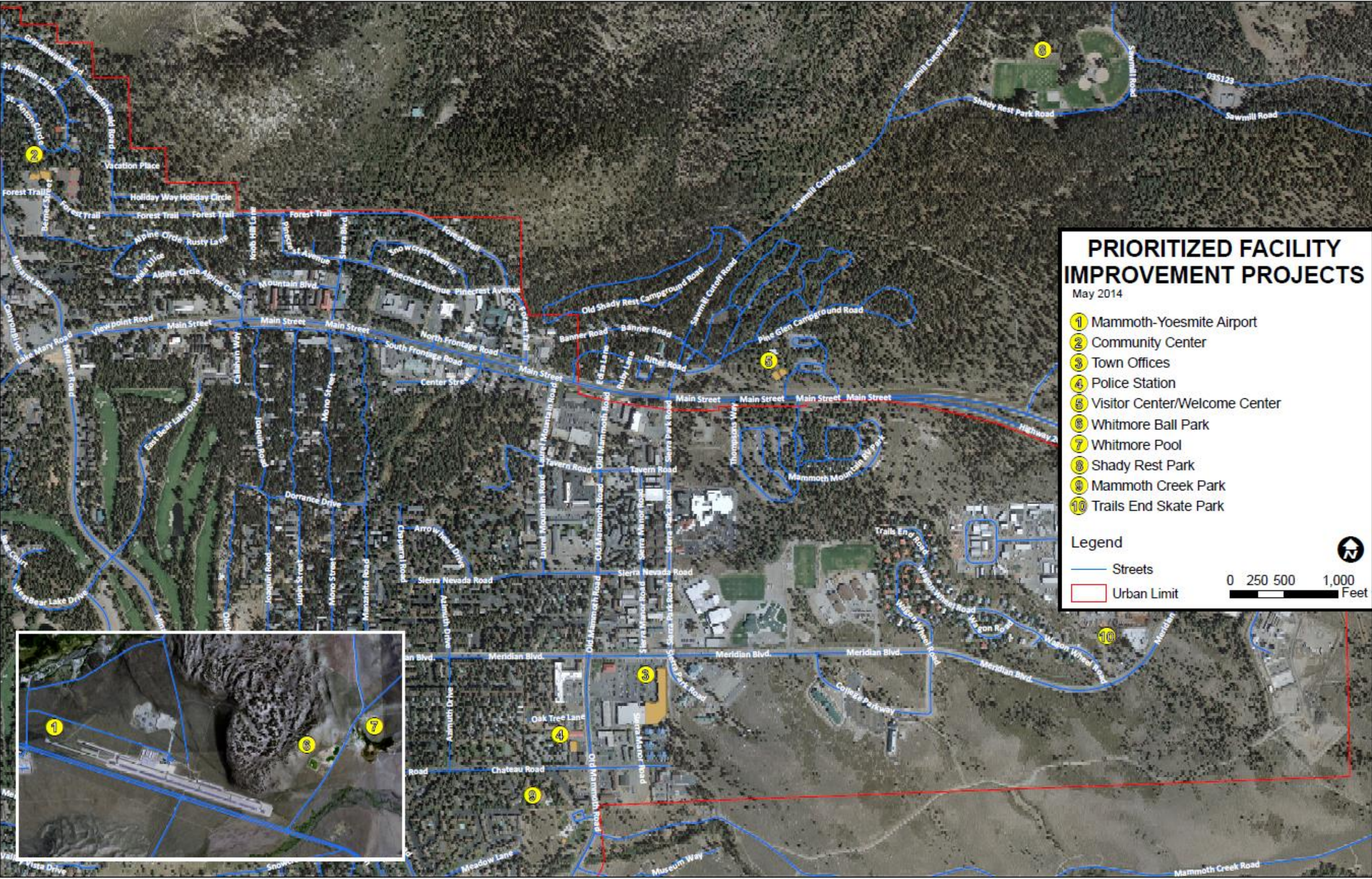
Potential projects are listed below based on priorities established in Section 6. This detailed list of potential improvement projects does not necessarily depict the complete and exact locations of all work to be undertaken as part of the ADA Transition Plan, since much of this work would be determined by public input requests and would be evaluated in conjunction with other construction projects. The cost per ramp is between \$3,500 and \$5,000.

No.	First Street	Second Street	Type	No of Curb Ramps
1	Canyon Boulevard	Lake Mary Road	Sidewalk	4
2	Meridian Boulevard	Minaret Road	Sidewalk	4
3	Old Mammoth Road	Meridian Boulevard	Sidewalk	4
4	Old Mammoth Road	Chateau Road	Sidewalk	4
5	Old Mammoth Road	Tavern Road	Sidewalk	4
6	Canyon Boulevard	8050 Driveway	Sidewalk	4
7	Minaret Road	Main Street	Sidewalk	2
8	Canyon Boulevard	Hillside Drive	Sidewalk	2
9	Main Street	Sierra Boulevard	Sidewalk	2
10	Meridian Boulevard	Lodestar Drive	Sidewalk	2
11	Meridian Boulevard	Joaquin Road	Sidewalk	1
12	Meridian Boulevard	Lupin Road	Sidewalk	1
13	Meridian Boulevard	Sierra Park Road	Sidewalk	1
14	Minaret Road	Forest Trail	Sidewalk	1
15	Old Mammoth Road	Mammoth Creek Park Road	Sidewalk	1
16	Old Mammoth Road	Oak Tree	Sidewalk	1
17	Canyon Boulevard	Forest Trail	Sidewalk	1
18	Canyon Boulevard	Mammoth Slopes Drive	Sidewalk	1
19	Meridian Boulevard	North Majestic Pines Drive	Sidewalk	1
20	Laurel Mountain Road	Tavern Road	Sidewalk	1
21	North Main Street (North Frontage Road)	Post Office Crosswalk	Promenade (Parallel)	2
22	South Main Street	Post Office Crosswalk	Promenade (Parallel)	1
23	South Frontage Road	Manzanita Road	Promenade (Parallel)	2
24	South Frontage Road	Mono Street	Promenade (Parallel)	1
25	South Frontage Road	Joaquin Road	Promenade (Parallel)	1
26	South Frontage Road	Lupin Road	Promenade (Parallel)	2
27	South Frontage Road	Callahan Way	Promenade (Parallel)	1
28	College Connector		Sidewalk	1
29	Main Street	Motel 6	Promenade (Parallel)	2
30	Hillside Drive	Forest Trail	Sidewalk	1
31	Lakeview Boulevard	Near End of Street	Sidewalk	2
32	Meridian Boulevard	Trails End Access Trail	Trail	1
33	Meridian Boulevard	Upper Wagon Wheel Road	Trail	2
34	Commerce Drive	Town Loop	Trail	2

APPENDIX B: PRIORITIZED FACILITY IMPROVEMENT PROJECTS

Potential projects are listed below based priorities established in Section 6. The results were provided through self-evaluation conducted by the Town in July 2007 and April 2014. This detailed list of potential improvement projects does not necessarily depict the complete and exact locations of all work to be undertaken as part of the ADA Transition Plan, since much of this work would be determined by public input requests and would be evaluated in conjunction with other construction projects.

No.	Facility/Building	Address	Number of Recorded Deficiencies
1	Mammoth-Yosemite Airport	1300 Airport Road, Mammoth Lakes	13
2	Community Center	1000 Forest Trail, Mammoth Lakes	33
3	Town Offices	437 Old Mammoth Road, Mammoth Lakes	52
4	Police Station	568 Old Mammoth Road, Mammoth Lakes	12
5	Visitor Center/Welcome Center	2510 Main Street, Mammoth Lakes	4
6	Whitmore Ball Park	Benton Crossing Road, Mammoth Lakes	4
7	Whitmore Pool	Benton Crossing Road, Mammoth Lakes	4
8	Shady Rest Park	Sawmill Road (Near Sawmill Cutoff) , Mammoth Lakes	10
9	Mammoth Creek Park	Old Mammoth Road, Across From Mammoth Creek Road, Mammoth Lakes	18
10	Trails End Skate Park	College Parkway, Mammoth Lakes	3



APPENDIX C: SECTION 504 SELF-EVALUATION FOR FACILITIES