City of Chicago Heights

Americans with Disabilities Act Self-Evaluation and Transition Plan

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Prepared by:

Kimley»Horn
Expect More. Experience Better.

Kimley-Horn
Suite 600
4201 Winfield Road
Warrenville, IL 60555

In association with:

Chicago Metropolitan Agency for Planning

Chicago Metropolitan Agency for Planning

Deepwalk

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The City of Chicago Heights has prepared this Transition Plan with the assistance of the consultant team led by Kimley-Horn and Associates, Inc. The Consultant Team, the ADA Coordinator, and the contributing departments of the City of Chicago Heights are responsible for developing the ADA Self-Evaluation and Transition Plan.

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ABBREVIATIONS GLOSSARY

ABA – Architectural Barriers Act of 1968

A law that requires that buildings or facilities that were designed, built, or altered with federal dollars or leased by federal agencies after August 12, 1968, be accessible. Facilities that predate the law generally are not covered, but alterations or leases undertaken after the law took effect can trigger coverage. The law covers a wide range of facilities, including U.S. post offices, Veterans Affairs medical facilities, national parks, Social Security Administration offices, federal office buildings, U.S. courthouses, and federal prisons. It also applies to non-government facilities that have received federal funding, such as certain schools, public housing, and mass transit systems.

ADA – Americans with Disabilities Act

A comprehensive civil rights law that prohibits discrimination based on disability in employment, public services, public accommodations, and telecommunications. Enacted in 1990, the ADA ensures equal opportunities and protections for individuals with disabilities. In 2008, the ADA Amendments Act was passed. Its purpose is to broaden the definition of disability, which U.S. Supreme Court decisions had narrowed.

ADAAG – Americans with Disabilities Act Accessibility Guidelines

Document that contains scoping and technical requirements for accessibility to buildings and facilities by individuals with disabilities under the ADA of 1990. These scoping and technical requirements are to be applied during the design, construction, and alteration of buildings and facilities covered by titles II and III of the ADA to the extent required by regulations issued by Federal agencies, including the Department of Justice and the Department of Transportation, under the ADA.

CFR – Code of Federal Regulations

The official legal print publication containing the codification of the general and permanent rules published in the Federal Register by the departments and agencies of the Federal Government.

CIP – Capital Improvement Program

A comprehensive plan that outlines a local government's major infrastructure projects and purchases over a specific period, typically 5-10 years. It's a crucial tool for managing and financing large-scale projects, ensuring infrastructure needs are addressed strategically and efficiently.

CMAP – Chicago Metropolitan Agency for Planning

An agency that was created to help the northeastern Illinois region address land use and transportation challenges. CMAP serves 284 municipalities from Cook, DuPage, Kane, Kendall, Lake, McHenry, and Will counties.

DOJ – United States Department of Justice

Under the leadership of the Attorney General of the United States, the Justice Department is composed of more than 40 separate component organizations and more than 115,000 employees. Headquartered at the Robert F. Kennedy Building in Washington, D.C., the Department maintains field offices in all states and territories across the United States and more than 50 countries around the world. The mission of the DOJ is to uphold the rule of law, to keep the country safe, and to protect civil rights.

FHWA – Federal Highway Administration

An agency within the U.S. Department of Transportation that supports State and local governments in the design, construction, and maintenance of the Nation's highway system (Federal Aid Highway Program) and various federally and tribal owned lands (Federal Lands Highway Program). Through financial and technical assistance to State and local governments, the Federal Highway Administration is responsible for ensuring that America's roads and highways continue to be among the safest and most technologically sound in the world.

IDOT – Illinois Department of Transportation

The Illinois Department of Transportation (IDOT) is a government agency responsible for planning, construction, and maintenance of the Illinois transportation network, which includes highways, bridges, and public transportation systems. Its mission is to ensure safe and efficient travel for residents and visitors across the state.

MUTCD – Manual on Uniform Traffic Control Devices

By setting minimum standards and providing guidance, the MUTCD ensures uniformity of traffic control devices (TCD) across the nation. The information contained in the MUTCD is the result of years of practical experience, research, and/or the MUTCD experimentation process. This effort ensures that TCDs are visible, recognizable, understandable, and necessary. The MUTCD is a dynamic document that changes with time to address contemporary safety and operational issues.

PROWAG – 2023 Final Public Rights-of-Way Accessibility Guidelines

Guidelines published by the U.S. Access Board under the ADA and the ABA that address access to sidewalks and streets, crosswalks, curb ramps, pedestrian signals, on-street parking, and other components of public right-of-way. These guidelines also review shared-use paths, which are designed primarily for use by bicyclists and pedestrians for transportation and recreation purposes.

PSA – Programs, Services, and Activities

Refers to the various initiatives, assistance, and engagement opportunities offered by organizations, governments, and communities to support individuals and groups. These can range from social services and educational opportunities to recreational activities and community development projects. They aim to address needs, promote well-being, and foster participation in various aspects of life.

UFAS – Uniform Federal Accessibility Standards

This document presents uniform standards for the design, construction, and alteration of buildings so that individuals with physical disabilities will have ready access to and use of them in accordance with the ABA. The document embodies an agreement to minimize the differences between the standards previously used by four agencies (the General Services Administration, the departments of Housing and Urban Development and Defense, and the United States Postal Service) that are authorized to issue standards under the ABA, and between those standards and the access standards recommended for facilities that are not federally funded or constructed.

EXECUTIVE SUMMARY

The City of Chicago Heights and CMAP have developed this Americans with Disabilities Act (ADA) Self-Evaluation and Transition Plan to enhance the accessibility of public rights-of-way facilities within the City for individuals with disabilities. This plan aims to ensure equal access to the City's facilities, in compliance with ADA standards and the latest Public Rights-of-Way Accessibility Guidelines (PROWAG).

ADA SELF-EVALUATION AND TRANSITION PLAN PURPOSE

The Americans with Disabilities Act (ADA), enacted on July 26, 1990, is a civil rights law prohibiting discrimination against individuals based on disability. The ADA consists of five titles outlining protections in the following areas:

I. Employment
II. State and local government services
III. Public accommodations
IV. Telecommunications
V. Miscellaneous provisions

Title II of the ADA pertains to the programs, services, and activities of public entities, such as the City of Chicago Heights. Title II of the ADA states that "…no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such entity." (42 USC. Sec. 12132; 28 CFR. Sec. 35.130).

To comply with Title II regulations, the City must complete a Self-Evaluation and Transition Plan which fulfills specific administrative requirements, including designating an ADA coordinator, establishing an ADA grievance procedure and form, and establishing an ADA public notice.

PUBLIC OUTREACH AND ENGAGEMENT

Public feedback was essential in developing this ADA Transition Plan. Efforts included:

- Establishing the CMAP engagement webpage which included a digital public access survey and mapping tool.
- Forming a Steering Committee consisting of community stakeholders.
- Conducting in-person interviews
- Attending public engagement events
- Disseminating physical surveys to gather input on barriers and areas needing improvement

ADMINISTRATIVE REQUIREMENTS

As required as part of the development of an ADA Transition Plan, the City has appointed the City's Chief of Staff, Karen Zerante, as ADA/504 Coordinator for Title II.

The City of Chicago Heights' ADA grievance policies and procedures were updated in December 2024. The City of Chicago Heights Title II ADA Grievance Policy, Procedure, and Form are available on the City's website as well as in the Transition Plan Appendix.

EVALUATION PROCESS

The Self-Evaluation and Transition Plan involved a thorough assessment of the City's pedestrian facilities in the public rights-of-way.

- **Signalized Intersections:** Eight (8) signalized intersections were evaluated, identifying issues such as non-compliant curb ramps and lack of pedestrian push buttons.
- **Sidewalk Corridors:** 158 miles of sidewalks, curb ramps, and pedestrian street crossings were evaluated, identifying issues such as excessing cross slopes, tripping hazards, obstructions and non-compliant curb ramps at intersections and driveways.
- **Transit Stops:** 122 transit stops were evaluated, identifying issues such as excessive slopes within the boarding areas and missing connections to additional pedestrian facilities.

Following the evaluations, conceptual budget estimates were developed to aid the City in planning budgets and coordinating with partner agencies, such as Pace Suburban Bus, for the remediation of the identified accessibility barriers.

IMPLEMENTATION STRATEGY

The Transition Plan establishes a multi-year implementation strategy for prioritizing and addressing identified barriers. Factors considered include severity on non-compliance, proximity to pedestrian attractors, public input, demographic data, and overall cost effectiveness.

A project prioritization tool was developed to incorporate all factors listed above to identify locations that the City can consider prioritizing for remediation.

CONCLUSION AND NEXT STEPS

The ADA Transition Plan signifies the City of Chicago Heights' commitment to ADA compliance, setting forth an actionable guide for enhancing public accessibility in the public rights-of-way. Moving forward, the City will continue to update this ADA Transition Plan as projects progress and barriers are remediated.

1.0 INTRODUCTION

1.1 PURPOSE

The purpose of this Americans with Disabilities Act (ADA) Self-Evaluation and Transition Plan is to summarize the activities completed to date related to ADA compliance and to create a roadmap for the City of Chicago Heights to update its public rights-of-way to meet current ADA design standards. The prioritization methodology for evaluating and implementing improvements was developed based on the applicable ADA Standards and Public Rights-of-Way Accessibility Guidelines (PROWAG), and the details are provided in this document.

This document includes an overview of the ADA. It provides possible solutions for the City of Chicago Heights, based on guidance from the Federal Highway Administration (FHWA) and the U.S. Department of Justice (DOJ), to improve public accessibility.

1.2 LEGISLATIVE MANDATE

The ADA is a civil rights law that mandates equal opportunity for individuals with disabilities and prohibits discrimination in access to jobs, public accommodations, government services, public transportation, and telecommunications. The ADA is divided into five titles:

- Title I: Employment
- Title II: Public Services
- Title III: Public Accommodations
- Title IV: Telecommunications
- Title V: Miscellaneous Provisions

Title II of the ADA also requires that all programs, services, and activities (PSAs) of public entities provide equal access for individuals with disabilities.

The City of Chicago Heights has undertaken a comprehensive evaluation of its pedestrian facilities in the public rights-of-way to determine the extent to which individuals with disabilities may be restricted in their access.

1.3 ADA SELF-EVALUATION AND TRANSITION PLAN DEVELOPMENT REQUIREMENTS AND PROCESS

The City of Chicago Heights is obligated to observe all requirements of Title I in its employment practices; Title II in its policies, programs, and services; any parts of Titles IV and V that apply to the City and its programs, services, or facilities; and all requirements specified in the applicable ADA Standards and PROWAG that apply to facilities and other physical holdings.

The City of Chicago Heights employs more than 50 people and therefore must follow the Title II administrative requirements. These administrative requirements are:

- Completion of a Self-Evaluation;
- Development of an ADA-compliant procedure;
- Designation of at least one (1) person who is responsible for overseeing Title II compliance; and
- Development of a Transition Plan to schedule the removal of the barriers uncovered by the Self-Evaluation process. The Transition Plan will become a working document to track progress in addressing barriers.

This document describes the process developed to complete the evaluation of the City of Chicago Heights's facilities in the public rights-of-way, provides possible solutions to remove programmatic barriers, and presents a Transition Plan for the modification of facilities within the public rights-of-way to improve accessibility, which will guide the planning and implementation of necessary program and facility modifications over the next several years. The ADA Self-Evaluation and Transition Plan is significant in that it establishes the City's ongoing commitment to the development and maintenance of facilities that accommodate all its residents.

1.4 DISCRIMINATION AND ACCESSIBILITY

Program accessibility means that, when viewed in its entirety, each program is readily accessible to and usable by individuals with disabilities. Program accessibility is necessary not only for individuals with mobility needs, but also for individuals with sensory and cognitive disabilities.

Accessibility applies to all aspects of a program or service, including but not limited to physical access, advertisement, orientation, eligibility, participation, testing or evaluation, provision of auxiliary aids, transportation, policies, and communication.

1.4.1 ONGOING ACCESSIBILITY IMPROVEMENTS

City PSAs and facilities evaluated during the Self-Evaluation will continue to be evaluated on an ongoing basis, and the ADA Transition Plan will be revised to account for changes that have been or will be completed since the initial Self-Evaluation. This Plan will be posted on the City's website for review and consideration by the public.

1.4.2 CITY OF CHICAGO HEIGHTS APPROACH

This ADA Transition Plan has been prepared after careful study of all pedestrian facilities in the public rights-of-way. The purpose of the plan is to provide the framework for achieving equal access throughout the City of Chicago Heights within a reasonable timeframe. The City's elected officials and staff believe that accommodating people with disabilities is essential to good customer service, ensures the quality-of-life Chicago Heights residents seek to enjoy, and guides future improvements.

The City of Chicago Heights should make reasonable modifications in PSAs when the modifications are necessary to avoid discrimination based on disability, unless the City can demonstrate that making the modifications will fundamentally alter the nature of the program,

service, or activity. The City of Chicago Heights will not place surcharges on individuals with disabilities to cover the cost involved in making PSAs accessible.

1.4.3 EXCEPTIONS AND EXEMPTIONS

Per the ADA Title II Regulations, a public entity shall operate each PSA so that the service, program, or activity, when viewed in its entirety, is readily accessible to and usable to individuals with disabilities. However, a public entity is not required to:

- Make each of its existing facilities accessible to and usable by individuals with disabilities.
- Take any action that would threaten or destroy the historic significance of a historic property.
- Take any action that it can demonstrate would cause a fundamental change in a service, program, or activity or create undue financial and administrative burdens.
- Permit an individual to participate in or benefit from the services, programs, or activities of that public entity when that individual poses a direct threat to the health or safety of others.

The sections below describe these exceptions and exemptions. In the event the City determines a proposed action would generate undue financial or administrative burden, create hazardous conditions for other people, or threaten or destroy the historic significance of a historic property, a municipality has a responsibility to communicate and document the decision, and the methodology used. If an action would result in such an alteration or such burdens, a municipality shall take any other actions that would not result in such an alteration or such burdens but would nevertheless ensure individuals with disabilities receive the benefits or services provided by the City.

EXISTING FACILITIES

A public entity is not required to make structural changes in existing facilities where other methods are effective in making its services, programs, or activities readily accessible to and usable by individuals with disabilities. When choosing among available methods for meeting compliance requirements, a public entity shall prioritize those methods that offer services, programs, and activities to qualified individuals with disabilities in the most integrated setting appropriate.

HISTORIC SIGNIFICANCE

In determining whether an alteration would threaten or destroy the historic significance of a historic property, the City should first confirm if the property is a qualified historic building or facility, which the ADA defines as a "building or facility that is listed in or eligible for listing in the National Register of Historic Places, or designated as historic under an appropriate state or local law." Based on a search of the National Register of Historic Places NPGallery Database and the associated geodatabase, there is one (1) registered historical place within the City. Still, there may be other documentation available that is not provided on these websites.

The Flat Iron Building, located within the City at 1441-1449 Emerald Ave, is listed as a historic site.

- Click here for the National Register of Historic Places website.
- Click here for the National Register of Historic Places database.

FUNDAMENTAL ALTERATIONS AND UNDUE BURDENS

In determining whether an alteration would impose an undue financial or administrative burden on a covered entity, factors to be considered include:

1. The nature and cost of the alteration needed.
2. The overall financial resources of the facility or facilities involved in the provision of the reasonable accommodation; the number of people employed at such facility; the effect on expenses and resources, or the impact otherwise of such accommodation upon the operation of the facility.
3. The overall financial resources of the covered entity; the overall size of the business of a covered entity concerning the number of its employees; the number, type, and location of its facilities; and (iv) the type of operation or operations of the covered entity, including the composition, structure, and functions of the workforce of such entity; the geographic separation, administrative, or fiscal relationship of the facility or facilities in question to the covered entity.

DIRECT THREAT

In determining whether an individual poses a direct threat to the health or safety of others, a public entity must make an individualized assessment, based on reasonable judgment that relies on current medical knowledge or on the best available objective evidence, to ascertain: the nature, duration, and severity of the risk; the probability that the potential injury will occur; and whether reasonable modifications of policies, practices, or procedures or the provision of auxiliary aids or services will mitigate the risk.

1.5 NEW CONSTRUCTION AND ALTERATIONS

Per the ADA Title II Regulations, if the start date for construction is on or after March 15, 2012, all newly constructed or altered state and local government facilities must comply with the 2010 ADA Standards. Before that date, the 1991 ADA Standards (without the elevator exemption), the Uniform Federal Accessibility Standards (UFAS), or the 2010 ADA Standards may be used for such projects when the start of construction commences on or after September 15, 2010 (see **Table 1**).

TABLE 1. SUMMARY OF APPLICABLE STANDARDS

Compliance Date for New Construction or Alterations	Applicable Standards
Before September 15, 2010	1991 ADA Standards or UFAS
On or after September 15, 2010, and before March 15, 2012	1991 ADA Standards, UFAS, or 2010 ADA Standards
On or after March 15, 2012	2010 ADA Standards

The U.S. Access Board is an independent federal agency that advances accessibility through leadership in accessible design and the development of accessibility guidelines and standards. On July 26, 1991, the U.S. Access Board published the original Americans with Disabilities Act Accessibility Guidelines (ADAAG), which were also adopted as standards by the DOJ on the same day. Between 1994 and 2002, the U.S. Access Board worked to update the 1991 ADAAG to include supplements covering state and local government facilities, building elements designed for children's use, play areas, and recreation facilities. The U.S. Access Board issued the updated ADA and ABA (Architectural Barriers Act of 1968) Accessibility Guidelines as a final rule on July 23, 2004 (2004 ADAAG).

The most recent standard is the 2010 ADA Standards, which sets the minimum requirements – both scoping and technical – for newly designed and constructed or altered state and local government facilities, public accommodations, and commercial facilities to be readily accessible to and usable by individuals with disabilities. It is effectuated from 28 Code of Federal Regulations (CFR) 35.151 and the 2004 Americans with Disabilities Act Accessibility Guidelines (ADAAG). However, the FHWA and DOJ recommend using PROWAG for designing facilities within the public rights-of-way as a best practice until it is adopted at the federal level.

2010 ADA Standards

The Department of Justice's revised regulations for Titles II and III of the Americans with Disabilities Act of 1990 (ADA) were published in the Federal Register on September 15, 2010. These adopted and revised regulations are enforceable accessibility standards, known as the 2010 ADA Standards. On March 15, 2012, compliance with the 2010 ADA Standards was required for new construction and alterations under Titles II and III. March 15, 2012 is also the compliance date for using the 2010 ADA Standards for program accessibility and barrier removal.

Public Rights-of-Way Accessibility Guidelines (PROWAG)

The U.S. Access Board recently published new guidelines under the ADA and the ABA that address access to sidewalks and streets, crosswalks, curb ramps, pedestrian signals, on-street parking, transit stops, and other components of public rights-of-way. These guidelines also review shared-use paths, which are designed primarily for use by bicyclists and pedestrians for transportation and recreation purposes. The Accessibility Guidelines for Pedestrian Facilities in the Public Rights-of-Way (PROWAG) provide minimum guidelines for the accessibility of pedestrian facilities in the public rights-of-way. When these guidelines are adopted, with or without modifications, as accessibility standards in regulations issued by other federal agencies implementing the ADA, Section 504 of the Rehabilitation Act, and the ABA, compliance with those enforceable accessibility standards is mandatory. The final rule was published on August 8, 2023, and became effective on September 7, 2023. PROWAG is the recommended best practice and can be considered the state of the practice that could be followed for areas not fully addressed by the 2010 ADA Standards.

The U.S. Department of Transportation (DOT) published its Final Rule on Transportation for Individuals with Disabilities: Adoption of Accessibility Standards for Pedestrian Facilities in the Public Right-of-Way (PROWAG) as the DOT's regulatory standards for new construction and alterations of transit stops in the public right-of-way. The Final Rule became effective on January 17, 2025. The DOT will also be determining how to ensure that there is no "conflict" between PROWAG and the 11th Edition of the Manual on Uniform Traffic Control Devices for Streets and Highways (MUTCD).

Until the U.S. Department of Transportation (DOT) and DOJ adopt accessibility standards for pedestrian facilities in the public right-of-way, public entities have some degree of flexibility in determining how they will comply with the general obligation under Title II of the ADA (to operate each service, program, or activity so that it is "readily accessible and useable by" individuals with disabilities). Public entities are not required to adopt the Final PROWAG at this time. Still, they may turn to different resources for guidance (e.g., Final PROWAG, DOJ's 2010 ADA Standards for buildings and sites, and other accessibility resources). However, it is recommended that the City of Chicago Heights adopt PROWAG so that it becomes an enforceable document for all City projects within the public rights-of-way, regardless of PROWAG's adoption status at the state and federal levels.

Manual on Uniform Traffic Control Devices for Streets and Highways (MUTCD)

The MUTCD defines the standards used by road managers nationwide to install and maintain traffic control devices on all streets, highways, pedestrian and bicycle facilities, and site roadways open to public travel. The FHWA publishes the MUTCD under 23 CFR, Part 655, Subpart F, and it is a compilation of national standards for all traffic control devices, including road markings, highway signs, and traffic signals. It is updated periodically to accommodate the nation's changing transportation needs and address new safety technologies, traffic control tools, and traffic management techniques. On December 19, 2023, a Final Rule adopting the 11th Edition of the MUTCD was published in the Federal Register with an effective date of January 18, 2024.

Illinois Department of Transportation Bureau of Local Roads and Streets Manual

The Bureau of Local Roads and Streets Manual is intended to serve as a comprehensive guide to assist local agencies in the planning, design, construction, and maintenance of local roads and streets. Its primary purpose is to ensure consistency in local transportation projects. The Bureau routinely updates the manual as there are changes in laws, policies, procedures, or design criteria.

1.6 EXISTING CITY PROGRAMS THAT IMPLEMENT ADA UPGRADES

The City of Chicago Heights currently implements ADA-compliant designs through the following efforts:

- The Engineering Department Roadway Improvement Program includes curb and gutter, pavement, and sidewalk maintenance, all of which improve the pedestrian path of travel in the public rights-of-way and help maintain accessible routes within the City in an accessible condition.
- The City's sidewalk is improved annually through an assessment and budgeting process. The outcome of those efforts indicates where improvements are needed.
- The City's Pavement Maintenance service includes pothole repairs that eliminate disruptions in the roadway surface. Additional services include preparation and repairs of paved surfaces where required throughout the City, including when these elements intersect the pedestrian path of travel.
- The City offers a 50/50 Cost Sharing Program to improve residential sidewalks. The City pays for half of the cost of sidewalk replacement for citizens who replace the sidewalks on their property.

- All City projects conform to the City design standards, which require compliance with PROWAG.
- The City looks for alternative funding sources like Safe Routes to Schools, the Community Development Block Grant (CDBG) Program, and the Transportation Alternatives Program (TAP) to finance improvements.

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2.0 PUBLIC OUTREACH

Gathering feedback from the public was a vital step in the development of the City of Chicago Heights ADA Transition Plan. Several outreach efforts were completed, designed to engage the community and gather valuable input, ensuring that efforts to improve accessibility are effective and inclusive for all residents.

In coordination with the Chicago Metropolitan Agency for Planning (CMAP), a Communications and Outreach Strategy was created to assist with organizing the public input initiatives throughout the project. This strategy consisted of the development of a project webpage containing project information as well as a public access survey and issue mapping tool, the development of a steering committee made up of community stakeholders, in-person interviews with members of the public and disability community, in-person public engagement events, and a municipal meeting to receive public input on the City's draft ADA Transition Plan. The following sections detail the various outreach efforts conducted during the development of the plan.

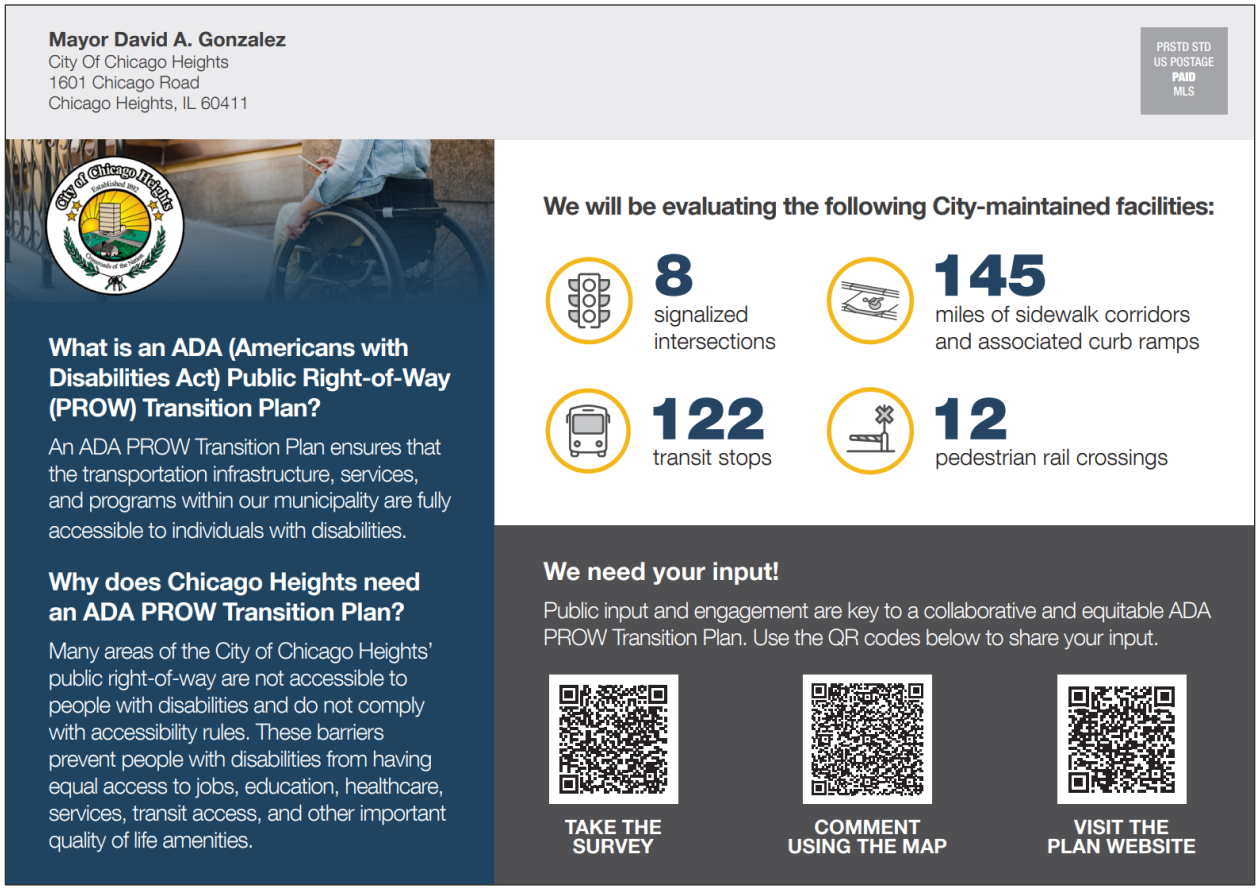
2.1 ENGAGE WITH CMAP PROJECT WEBPAGE

Through collaboration with CMAP, a project webpage was developed that contained ADA background and project-specific information for the City of Chicago Heights' ADA Transition Plan.

The webpage provided background information on the project, kept residents informed about the project's schedule, and was updated throughout the project as public events were scheduled. The webpage and all engagement materials were prepared in both English and Spanish.

Throughout the project, the City regularly publicized the project webpage through social media, postcards, and flyers. The materials included QR codes, which directed residents to the project website. A copy of the flyer that was developed is shown in **Figure 1.**

FIGURE 1. CITY OF CHICAGO HEIGHTS PUBLIC RIGHTS-OF-WAY ADA TRANSITION PLAN FLYER



The webpage also included a public access survey and an online interactive map, allowing the public to identify specific locations where they experience issues related to accessibility, safety, connectivity, or suggest accessibility improvements needed in Chicago Heights.

The survey garnered a total of 77 responses:

- 30% responded positively when asked about barriers in Public Rights-of-Way
- 70% responded positively when asked about programmatic barriers
- 70% of respondents believe the City is accommodating of persons with disabilities
- 70% of respondents obtain available information from the City website and social media

The online interactive map garnered a total of 2 responses; the feedback identified locations of broken sidewalks, which corresponded to findings from the field evaluation.

A summary of the responses to the survey and interactive map is provided in **Appendix A**.

2.2 STEERING COMMITTEE

A project steering committee comprised of community stakeholders was formed during the development of the Transition Plan. The committee met four (4) times throughout the development of the City's ADA Transition Plan and provided project direction, reviewed key deliverables, and assisted with public outreach efforts. City staff, CMAP staff, and the consultant team met with the steering committee on the following dates to provide project updates, discuss existing areas of concern, evaluate potential methods for improvement prioritization, assist with identifying community residents to interview, coordinate on upcoming public outreach events, review project deliverables, and discuss the state of accessibility in Chicago Heights.

- March 27, 2025
- May 15, 2025
- August 28, 2025
- October 23, 2025

The committee was comprised of City Aldermen and representatives of key organizations that directly engage with disability community, ensuring that those most impacted by the plan had the opportunity to provide valuable input.

2.3 IN-PERSON INTERVIEWS

To gather more direct feedback, the consultant team facilitated eight (8) interviews with members of the Steering Committee, City staff, and members of the public. The interviews, conducted between July and September 2025, provided insight into residents' understanding of current conditions and their future vision for the community. Overall, the interviewees were pleased with the efforts the City has already made to improve accessibility and expressed enthusiasm about the investments that will be made into the public infrastructure. Some expressed concerns about the pacing of improvements and hoped additional funds would help. Residents acknowledge that certain pedestrian facilities, such as those maintained by Cook County or IDOT, are not within the City's jurisdictional control for improvement.

Interviewees outlined some potential areas to prioritize, such as the Chicago Rd, Joe Orr Rd, and the Dixie Hwy triangle (all of which are IDOT [Illinois Department of Transportation] roadways), or mentioned they were looking forward to when their neighborhood would be next to receive accessibility upgrades. Some of those interviewed also suggested groups that the City could partner with in the future for public outreach and awareness campaigns, such as the Chicago Heights Park District and Sertoma Stars. Residents also noted difficulties navigating the pedestrian facilities at intersections where multiple jurisdictions cross, and where maintenance differences lead to barriers. Notes from the interviews were summarized and are provided in **Appendix A.**

2.4 PUBLIC ENGAGEMENT EVENTS

The City hosted two (2) public engagement events to receive feedback from project stakeholders and the public.

The first event was a project kick-off event, which took place on April 16, 2025, at the Jones Community Center. A presentation was prepared to provide an overview of the project to the public and highlight specific ways for residents and others to contribute to the plan's development and stay up to date on its progress. Attendees were handed flyers with QR codes and were encouraged to visit the project webpage and fill out the survey and interactive map. Physical copies of the survey were also handed out for those unable to navigate the webpage.

The second event was held on July 12, 2025, at the Ward 1 Residents Meeting at the Barack Obama School of Leadership and S.T.E.M. During this meeting a presentation was shown providing an overview of the project, demonstrating some of the accessibility issues that were found throughout the project limits, and encouraging continued engagement and input from the public through the usage of the online survey and map, as well as physical copies available for use.

All feedback provided at both events was anonymized and compiled, and is provided in **Appendix A.**

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3.0 SELF-EVALUATION AND SUMMARY OF OBSERVATIONS

The City of Chicago Heights's ADA Self-Evaluation reflects the results of a review of select programs, services, and activities, as well as the policies and practices the City uses to implement its various programs, services, and activities.

3.1 SERVICES, POLICIES, AND PRACTICES REVIEW

Under the ADA, the City of Chicago Heights is required to complete a Self-Evaluation of the City's services, policies, and practices and operate each service, program, and activity so that it is readily accessible and usable by individuals with disabilities. The Self-Evaluation identifies and provides possible solutions to those services, policies, and practices that are inconsistent with Title II requirements. To be compliant, the Self-Evaluation should consider all the City's programs, services, and activities, as well as the policies and practices the City uses to implement its various programs, services, and activities.
To comply with the requirements of the ADA, the City must take corrective measures to achieve program accessibility through several methods, including, but not limited to:

1. Relocation of programs to accessible facilities;
2. Modifications to existing programs so they are offered in an accessible manner;
3. Structural methods such as altering an existing facility;
4. Policy modifications to ensure nondiscrimination; and
5. Auxiliary aids provided to produce effective communication.

When selecting a method for providing program access, the City should prioritize the approach that promotes inclusion for all users, including individuals with disabilities.

PSAs offered by the City to the public must be accessible. Accessibility applies to all aspects of a program, services, or activity, including advertisement, orientation, eligibility, participation, testing or evaluation, physical access, provision of auxiliary aids, transportation, policies, and communication.

However, the City does not have to take any action that will result in a fundamental alteration in the nature of a program or activity, create a hazardous condition for other people, or result in an undue financial and/or administrative burden. This determination should generally be made by the ADA/504 Coordinator and/or an authorized designee of the City, such as the City's Chief of Staff. It must be accompanied by a written statement detailing the reasons for reaching the determination.

The determination of undue burden must be based on an evaluation of all resources available for use. If a barrier removal action is judged unduly burdensome, the City must consider all other options for providing access that will ensure that individuals with disabilities receive the benefits and services of the program or activity. This process must be fully documented.

3.1.1 ADA/504 COORDINATOR

Under the ADA Title II, when a public entity has 50 or more employees based on an entity-wide employee total count, the entity is required to designate at least one (1) qualified responsible

employee to coordinate compliance with ADA requirements. The name, office address, and telephone number of this individual must be available and advertised to employees and the public. This allows for clear identification of the person at the City who can assist with questions and concerns regarding disability discrimination.

The City of Chicago Heights has appointed the City's Chief of Staff, Karen Zerante as of September 2025, as ADA/504 Coordinator for Title II. Below is the ADA/504 Coordinator's contact information.

ADA/504 Coordinator
Chief of Staff - Mayor's Office
1601 Chicago Road
Chicago Heights, IL 60411
Office: 708-756-5315
Relay: 7-1-1
HR@chicagoheights.net

The ADA/504 Coordinator contact information must be provided to interested parties. The following distribution methods are recommended:

- Post on the City website;
- Prominently display in common areas that are accessible to all employees and areas open to the public;
- Include in materials that the City distributes for meetings and events where requests for auxiliary aids or services for effective communication might be needed; and
- Include in materials that the City distributes where ADA questions or concerns may arise.

3.1.2 ROLES AND RESPONSIBILITIES OF THE ADA/504 COORDINATOR

Below is a list of qualifications for ADA Coordinators that the U.S. Department of Justice recommends:

- Familiarity with the entity's structures, activities, and employees;
- Knowledge of the ADA and other laws addressing the rights of people with disabilities, such as Section 504 of the Rehabilitation Act;
- Experience with people with a broad range of disabilities;
- Knowledge of various alternative formats and alternative technologies that enable individuals with disabilities to communicate, participate, and perform tasks;
- Ability to work cooperatively with local entities and people with disabilities;
- Familiarity with any local disability advocacy groups or other disability groups;
- Skills and training in negotiation and mediation; and
- Organizational and analytical skills.

The responsibilities of the ADA/504 Coordinator include coordinating the City's efforts to comply with Title II and investigating any complaints related to potential violations of Title II. The role of the ADA Coordinator typically includes being the primary contact when members of the public request an auxiliary aid or service for effective communication, such as a sign language interpreter or documents in Braille. An effective ADA Coordinator will be able to efficiently assist people with disabilities with their questions. These roles and responsibilities are consistent with the guidance in the DOJ's ADA Title II toolkit. **Click here for the DOJ Title II Toolkit**.

3.1.3 ADA TITLE II GRIEVANCE POLICY, PROCEDURE, AND FORM WITH APPEALS PROCESS

Local governments with 50 or more employees are required to adopt and publish procedures for resolving grievances promptly and fairly that may arise under Title II of the ADA. The DOJ's Title II Toolkit suggests the grievance procedure include:

- A description of how and where a complaint under Title II may be filed;
- If a written complaint is required, a statement notifying potential complainants that alternative means of filing will be available to people with disabilities who require such an alternative;
- A description of the time frames and processes to be followed by the complainant and the government entity;
- Information on how to appeal an adverse decision; and
- A statement of how long the complaint files will be retained

The City of Chicago Heights' ADA grievance policies and procedures were updated in December 2024. The City of Chicago Heights Title II ADA Grievance Policy, Procedure, and Form can be found in **Appendix B** and are also available on the City's website here: **Click here for the City of Chicago Heights ADA Grievance Procedure and Form**.

3.1.4 PUBLIC NOTICE UNDER THE ADA

The ADA public notice requirement applies to all state and local governments covered by Title II, including entities with fewer than 50 employees. The target audience for the public notice includes applicants, beneficiaries, and other people interested in the entity's programs, services, and activities. This notice is required to include information regarding Title II of the ADA and how it applies to the programs, services, and activities of the public entity. The Department of Justice suggests including brief statements about:

- Employment;
- Effective communication;
- Making reasonable modifications to policies and programs;
- Not placing surcharges on modifications or auxiliary aids and services; and
- Filing complaints.

The notice should also include the name and contact information of the ADA/504 Coordinator. Publishing and publicizing the ADA notice is not a one-time requirement. State and local government entities should provide the information on an ongoing basis, whenever necessary.

The City of Chicago Heights' ADA Public Notice can be accessed in **Appendix B** and is also posted on the City's website: **Click here for the City of Chicago Heights Public Notice Under the ADA**.

3.1.5 ADA LIAISON COMMITTEE

The City of Chicago Heights has established an ADA Liaison Committee that is comprised of representatives from various City departments. These representatives are responsible for serving as the ADA contact for their department and will consult with the ADA/504 Coordinator on all ADA-related issues affecting their department. Each representative is responsible for

keeping a detailed log of all ADA inquiries within their department. This log shall be shared with the ADA/504 Coordinator and shall be retained for at least three (3) years.

To promote awareness of the committee and its activities, ADA Liaison Committee information can be publicized in common areas accessible to employees and areas open to the public. This includes posting this information on the City website.

3.1.6 CITY ORDINANCE REVIEW

The City's ordinances that affect the usability of public right-of-way facilities were reviewed for consistency with current accessibility requirements and standards.

- **Sec 20-27.** - The City of Chicago Heights does not allow trash or garbage containers to be placed on City sidewalks outside of very specific times before trash collection, in an effort to improve the usability of the sidewalk network.

- **Sec 37-3.** - The City does not allow residents to deposit any snow removed from an adjacent private property upon a public sidewalk.

3.1.7 SNOW REMOVAL

While not explicitly related to non-discrimination based on disability, the City of Chicago Heights understands that the presence of snow can create mobility challenges for all pedestrians, such as when snow blocks the use of a sidewalk on a public right-of-way.

3.2 FACILITIES REVIEW

All public rights-of-way facilities owned by the City of Chicago Heights were evaluated for compliance with the associated ADA standards or guidelines, and the results of the evaluations are summarized throughout this section.

3.2.1 SIGNALIZED INTERSECTIONS

Eight (8) signalized intersections within the City of Chicago Heights were evaluated. Signalized intersection evaluations cataloged the conditions and measurements along the pedestrian path of travel, which includes street crossings, curb ramps, sidewalk adjacent to the curb ramps, and pedestrian signal equipment and adjacent clear spaces.

All signalized intersections included in the evaluation are listed on a map included in **Appendix C**.

Signalized Intersections: Self-Evaluation Observations

Common curb ramp issues included excessive landing running slopes, excessive flare cross slopes, traversable sides, and a lack of a flush transition to the roadway. **Table 2** provides a summary of the curb ramp issues at signalized intersections.

About twenty percent (20%) of pedestrian crossings at signalized intersections did not have pedestrian signal heads or pedestrian push buttons. Pedestrian push buttons and signal heads were recommended for installation at all signalized intersection pedestrian crossings where they did not exist. Common issues associated with the existing pedestrian push buttons included non-existent or inaccessible push button clear spaces, excessive push button clear space cross slopes, push buttons installed at locations inconsistent with PROWAG, and excessive push button heights. **Table 3** provides a summary of push button issues.

Signalized Intersections: Possible Solutions

A complete list of possible solutions can be found in the signalized intersection reports provided in **Appendix C**.

TABLE 2. SUMMARY OF CURB RAMP ISSUES AT SIGNALIZED INTERSECTIONS

Curb Ramp Element	Number Evaluated	Number Compliant	Percent Compliant
Detectable warning surface exists	24	24	100%
Curb ramp lands in crosswalk	24	23	95.8%
Detectable warning surface is compliant	24	23	95.8%
Curb ramp cross slope ≤ 2.1%	24	23	95.8%
Curb ramp width ≥ 48”	24	23	95.8%
Curb ramp counter slope ≤ 5%	24	22	91.7%
Curb ramp present where curb ramp is needed	27	24	88.9%
48” crosswalk extension exists	8	7	87.5%
No ponding in curb ramp, turning space (landing), or flares	24	19	79.2%
Curb ramp turning space (landing) cross slope ≤ 2.1%	13	10	76.9%
Curb ramp running slope ≤ 8.3%	24	18	75.0%
Curbed sides are 90°	15	11	73.3%
No obstruction in curb ramp, turning space (landing), or flares	24	16	66.7%
Curb ramp turning space (landing) exists and is needed	20	13	65.0%
Flush transition to roadway exists	24	15	62.5%
Curb ramp does not have traversable sides	15	9	60.0%
Flare cross slope ≤ 10%	9	5	55.6%
Curb ramp turning space (landing) running slope ≤ 2.1%	13	7	53.8%

TABLE 3. SUMMARY OF PUSH BUTTON ISSUES

Push Button Element	Number Evaluated	Number Compliant	Percent Compliant
Push button height ≤ 48”	23	23	100%
Push button diameter 2”	23	23	100%
Pedestrian push button sign is MUTCD-approved	19	19	100%
Push button offset from curb ≤ 10’	23	22	95.7%
Clear space is ≥ 30" x 48"	20	19	95.0%
Push button reach range > 10"	23	20	87.0%
Push button orientation parallel to crossing	23	19	82.6%
Pedestrian head present where needed	36	29	80.6%
Push button offset from crosswalk ≤ 5’	23	16	69.6%
Cross slope of the clear space ≤ 2.1%	20	13	65.0%

3.2.2 SIDEWALK CORRIDORS

The sidewalk corridor evaluations document conditions and measurements along the pedestrian path of travel, which includes the sidewalk, pedestrian street and driveway crossings, and curb ramps. Approximately 158 miles of sidewalk corridors were evaluated. A map of the evaluated sidewalk corridors is provided in **Appendix C**.

Sidewalk Corridors: Self-Evaluation Observations

The evaluated sidewalks were scored on a scale from zero (0) to five (5). The scoring system considered several factors, including:

- Levels of deterioration
- Cross slope of the sidewalk
- Presence of barriers to access, such as obstructions and tripping hazards
- Ponding
- Presence of any overgrown vegetation, such as tree limbs overhanging the sidewalk

Sidewalk scores for the entire City network are summarized in **Section 3.3**.

More detailed scoring information and locations can be found in the detailed sidewalk reports. Common issues along the sidewalk corridors included:

- Excessive cross slopes (see **Figure 2**)
- Tripping hazards (see **Figure 3**)
- 469 permanent obstructions in the sidewalk, such as power poles or utilities (see **Figure 4)**
- 752 Temporary obstructions in the pedestrian circulation path, such as weeds and low-hanging branches. (See **Figure 5**)

In total, over 5,712 tripping hazards were identified throughout the City.

FIGURE 2. SEVERE CROSS SLOPES



FIGURE 3. TRIPPING HAZARDS

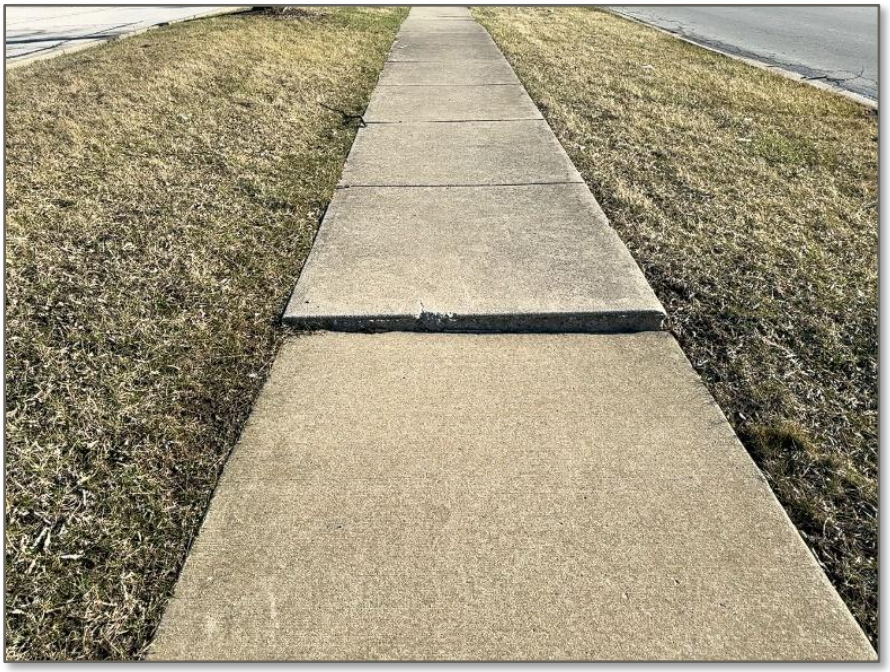


FIGURE 4. PERMANENT OBSTRUCTIONS



FIGURE 5. TEMPORARY VEGETATION OBSTRUCTIONS



Common curb ramp issues at unsignalized intersections and driveways along the sidewalk corridors include curb ramps having excessive landing running slopes and cross slopes, no presence of color contrast or texture contrast (detectable warning surfaces), poor surface conditions in the curb ramp, landing, or flares and excessive running slopes. A summary of the unsignalized intersection and driveway curb ramp issues is provided in **Table 4**.

ADA Title II Regulations (28 CFR Part 35), Section 35.150, Existing Facilities, requires that the Transition Plan include a schedule for providing curb ramps or other sloped areas where pedestrian sidewalks 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.

Sidewalk Corridors: Possible Solutions

The following possible solutions were identified to improve pedestrian safety and are incorporated into the reports for unsignalized intersections and driveways. These improvements are based on engineering judgement but are not required by federal accessibility standards:

- For all existing, unmarked crosswalks (as defined by PROWAG) at unsignalized intersections, the installation of crosswalk markings is recommended. The 2009 MUTCD states that on approaches controlled by STOP or YIELD signs, crosswalk markings should be installed where engineering judgment dictates markings are needed to guide pedestrians who are crossing roadways by defining and delineating paths on approaches where traffic stops. Additionally, in conjunction with signs and other measures, crosswalk markings help to alert road users of a designated pedestrian crossing point across roadways at locations that are not controlled by traffic control signals or STOP or YIELD signs.

A complete list of possible solutions can be found in the sidewalk and unsignalized intersection/driveway facility reports.

TABLE 4. SUMMARY OF CURB RAMP ISSUES AT UNSIGNALIZED INTERSECTIONS

Curb Ramp Element	Number Evaluated	Number Compliant	Percent Compliant
Surfaces: No obstruction in curb ramp, landing, or flares	556	552	99.3%
Curb ramp width ≥ 48”	556	509	91.5%
Curb ramp present where curb ramp is required	660	556	84.2%
Curb ramp running slope ≤ 8.3%	556	437	78.6%
Surfaces: No cracking, ponding in curb ramp, landing, or flares	556	419	75.3%
Detectable warning surface is compliant	556	383	68.9%
Curb ramp cross slope ≤ 2.1%	556	75	13.5%

3.2.3 TRANSIT STOPS

All transit stops within the City limits have been evaluated and included within this Transition Plan. However, transit stops serving the City of Chicago Heights are operated by Pace Suburban Bus, and Pace is responsible for maintaining compliance at their transit stops. Additionally, the transit stops are located along IDOT and County roadways; therefore, the sidewalk connections would fall under IDOT or County responsibility.

Including the transit stops in this Transition Plan enables the City to coordinate with the responsible parties effectively; however, the City does not have the authority to remediate the identified barriers.

One hundred twenty-two (122) transit stops within the City of Chicago Heights were evaluated. Transit stop evaluations documented the conditions and measurements within the boarding areas, adjacent sidewalk network, transit stop sidewalk areas, and transit stop amenities.

Transit Stop: Self-Evaluation Observations

Common transit stop issues included non-compliant transit stop signage, boarding area lengths under 96 inches, excessive boarding and alighting area and shelter clear space running slopes, and no flush transitions at connections with the boarding and alighting area. A summary of the transit stop issues identified during the self-evaluation is found in **Table 5**, and issues associated with transit stop amenities are found in **Table 6**.

The following locations do not have access provided to the transit stop boarding and alighting area from the nearest public rights-of-way sidewalk or nearest cross street. However, there is no one-size-fits-all solution for providing transit access, and each location should be reviewed independently by Pace.

- N Halsted St, west side of street (North of 195th St)
- N Halsted St, east side of street (South of 195th St)
- S Halsted St, east side of street (South of Alice St)

- S Halsted St, west side of street (North of Vollmer Rd)
- Vollmer Rd, north side of street (West of S Halsted St)
- S Halsted St, west side of street (North of Prairie State College)
- S Halsted St, east side of street (South of Prairie State College)
- S Halsted St, west side of street (North of Eastgate Ave)
- E 14th St, north side of street (East of State St)
- Lincoln Hwy, north side of street (West of Chicago Rd)
- Lincoln Hwy, north side of street (East of Damico Dr)
- Lincoln Hwy, north side of street (West of Fairview Ave)
- Lincoln Hwy, north side of street (East of Hilltop Ave)
- E 16th St, south side of street (East of Chicago Rd)

Transit stop signage was evaluated per PROWAG Section R410 Visual Characters on Signs. A CADD file of the sign template was not available, so measurements were taken using the sign at the stop on the South side of E 16th St, just North of Chicago Heights City Hall. These measurements were assumed to be representative of all transit stop signage.

A few notable items affecting the compliance of the transit stop signage include:

- Character Proportions
- Character Height
- Stroke Thickness

The transit stop signage measurements can be found in the Transit Stop reports.

TABLE 5. SUMMARY OF TRANSIT STOP ISSUES – BOARDING AND ALIGHTING AREA

Transit Stop Element	Number Evaluated	Number Compliant	Percent Compliant
Boarding and alighting area width ≥ 60"	108	108	100%
Connection exists between boarding and alighting area and street or sidewalk network	108	108	100%
Boarding and alighting area exists	108	108	100%
No permanent obstruction (>0.25") in boarding and alighting area	108	108	100%
No temporary obstruction (>0.25") in boarding and alighting area	108	107	99.1%
No ponding present in the boarding and alighting area	108	93	86.1%
Boarding and alighting area cross slope ≤ grade of adjacent street	108	90	83.3%
No heaving/sinking/cracking present in the boarding and alighting area	108	73	67.6%
Flush transition at connection to the curb	76	41	54.0%
Boarding and alighting area running slope ≤ 2.1%	108	45	41.7%
Boarding and alighting area length ≥ 96"	108	38	35.2%

TABLE 6. SUMMARY OF TRANSIT STOP ISSUES – TRANSIT STOP AMENITIES

Transit Stop Element	Number Evaluated	Number Compliant	Percent Compliant
Clear space is present under the shelter	20	20	100%
Shelter clear space width is ≥ 30"	20	20	100%
Shelter opening clear width is ≥ 32"	20	20	100%
Shelter clear space length is ≥ 48"	20	18	90.0%
Transit stop signage is present	122	89	73.0%
Shelter clear space cross slope is ≤ 2.1%	20	14	70.0%
Shelter clear space running slope is ≤ 2.1%	20	11	55.0%
Transit stop signage is compliant	122	0	0%

Transit Stop: Possible Solutions

A complete list of possible solutions can be found in the transit stop reports. If the Pace chooses to update the transit stop sign template, all text should meet the guidelines in PROWAG Section R410 Visual Characters on Signs.

3.3 PRIORITIZATION

The following sections outline the prioritization factors and results of the prioritization for signalized intersections, sidewalks, unsignalized intersections, and transit stops. Each facility type has a different set of parameters to establish the prioritization for improvements. These prioritization factors were taken into consideration when developing the implementation plan for the proposed improvements.

3.3.1 BARRIER PRIORITIZATION FACTORS

High priority barriers prohibit access for a person with a disability, make access extremely troublesome, or present safety hazards to all users. These barriers likely do not have acceptable alternative routes or treatments to overcome the barrier.

Medium priority barriers partially prohibit access or make access quite difficult for a person with a disability. For medium priority barriers, alternative routes or treatments to overcome the barrier may or may not exist. Medium priority barriers may also be barriers that are significant obstacles prohibiting access, but for which alternative access is available, or assistance is readily available to navigate around the barrier. The presence of the medium priority barrier may pose a minor hazard to individuals with disabilities attempting to use the facility.

Low priority barriers typically do not limit access to facilities for a person with a disability. For low priority barriers, alternative routes or treatments are typically available or assistance can be provided to overcome the barrier. It is not likely that the presence of a low priority barrier would cause danger to a person with a disability who is attempting to use or access the facility.

Physical barriers to access for signalized intersections, sidewalk corridors, unsignalized intersections/driveways, and transit stops were assigned a barrier priority, which is defined in **Tables 7, 8, 9,** and **10** below. This barrier prioritization methodology was developed by the Consultant Team and is just one of many factors that the City can consider in developing the Transition Plan implementation strategy (see **Section 5.2 Implementation Strategy** as well as **Appendix D** for more information). Barrier priorities for specific locations can be found in the detailed project reports.

TABLE 7. BARRIER PRIORITIES FOR SIGNALIZED INTERSECTIONS

Barrier Priority	Criteria
1 (high)	Complaint filed on curb ramp or intersection
2 (high)	Existing curb ramp with any of the following conditions: • Running slope > 12% • Cross slope > 7% • Obstruction to or in the curb ramp or landing • Level change > ¼ inch at the bottom of the curb ramp • No detectable warnings AND within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
3 (high)	No curb ramp where required AND within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
4 (high)	No curb ramps, but striped crosswalk exists
5 (medium)	Existing curb ramp with any of the following conditions: • Running slope > 12% • Cross slope > 7% • Obstruction to or in the curb ramp or landing • Level change > ¼ inch at the bottom of the curb ramp • No detectable warnings AND NOT within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
6 (medium)	No curb ramp where required AND NOT within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
7 (medium)	Existing diagonal curb ramp (serving both crossing directions on the corner) is non-compliant and should be replaced with two curb ramps, one serving each crossing direction on the corner.
8 (medium)	Existing curb ramp with any of the following conditions: • Cross slope > 5% • Width < 36 inches • Median/channelized island pedestrian crossings that are inaccessible
9 (low)	Existing curb ramp with either running slope between 8.3% and 11.9% or non-compliant landing
10 (low)	Existing curb ramp at apex of corner without a 48-inch x 48-inch clear area
11 (low)	Existing pedestrian push button is not accessible from the sidewalk and/or curb ramp
12 (low)	Existing curb ramp with returned curbs where pedestrian travel across the curb is not protected
13 (low)	All other intersections not prioritized above

TABLE 8. BARRIER PRIORITIES FOR SIDEWALK CORRIDORS

Barrier Priority	Criteria
0 (high)	More than 25% Deteriorated
1 (high)	10-25% Deteriorated
2 (high)	Major Barriers to Access Found
3 (medium)	Moderate Barriers to Access Found
4 (medium)	Minor Barriers to Access Found
5 (low)	No Significant Barriers to Access Found

TABLE 9. BARRIER PRIORITIES FOR UNSIGNALIZED INTERSECTIONS AND DRIVEWAYS

Barrier Priority	Criteria
1 (high)	Near a pedestrian attractor and Average accessibility grade < 3
2 (high)	Near a pedestrian attractor and Average accessibility grade > 3
3 (medium)	Not near a pedestrian attractor and Average accessibility grade < 2.5
4 (medium)	Not near a pedestrian attractor and Average accessibility grade is between 2.5 and 4
5 (low)	Not near a pedestrian attractor and Average accessibility grade is > 4

TABLE 10. BARRIER PRIORITIES FOR TRANSIT STOPS

Priority	Criteria
1 (high)	• No connection from boarding and alighting area to existing pedestrian circulation path • Transitions at connections between the boarding and alighting area, transit stop sidewalk, and/or sidewalk network is greater than 0.25” • Heaving/sinking/cracking in the boarding and alighting area, transit stop sidewalk, or sidewalk network that connects to the transit stop with level changes greater than 0.25”, or gaps over 0.5” • Boarding and alighting area does not exist
2	• Boarding and alighting area length less than 48” • Boarding and alighting area width less than 36” • Permanent obstruction (>0.25") in boarding and alighting area, transit stop sidewalk, or sidewalk network • Transition at connection to the curb is greater than 0.25" • Clear space width under shelter or adjacent to a stand-alone bench is less than 30"
3	• Sidewalk network or transit stop sidewalk cross slope is over 3.5% • No clear space adjacent to bench under shelter • Clear space cross slope under shelter or adjacent to a stand-alone bench is greater than 3.5% • Clear space running slope under shelter or adjacent to a stand-alone bench is greater than 3.5%; Clear space length under shelter or adjacent to a stand-alone bench is less than 42" • Shelter opening clear width is less than 30”
4	• Boarding and alighting area length is 48” – 76.9” • Boarding and alighting area width is 36” – 47.9” • Boarding and alighting area running slope is 3.1% - 5% • Ponding in the boarding and alighting area, transit stop sidewalk, or sidewalk network • Temporary obstruction (>0.25") in boarding and alighting area, transit stop sidewalk, or sidewalk network • Sidewalk network connecting to the transit stop is 46.1” – 47.9” wide • Sidewalk network cross slope is between 2.2% to 3.5% • No transit stop signage • Non-compliant transit stop signage • No clear space adjacent to stand-alone bench • Clear space cross slope under shelter or adjacent to a stand-alone bench is 2.2% - 3.5% • Clear space running slope under shelter or adjacent to a stand-alone bench is 2.2% - 3.5% • Clear space length under shelter or adjacent to a stand-alone bench is 42" – 45.9” • Shelter opening clear width is between 30" and 32”
5 (low)	• Boarding and alighting area length is 72” - 95.9” • Boarding and alighting area width is 48” - 59.9” • Boarding and alighting area running slope is 2.2% - 4.9% • Clear space length under shelter or adjacent to a stand-alone bench is 46" – 47.9"

Tables 11, **12**, **13**, and **14** provide summaries of the prioritization classifications for signalized intersections, sidewalk corridors, unsignalized intersections, and transit stops, respectively.

TABLE 11. SIGNALIZED INTERSECTION BARRIER PRIORITY SCORE DISTRIBUTION

Signalized Intersection Barrier Priority	Intersections
0 (compliant)	3
1 (high)	-
2 (high)	3
3 (high)	-
4 (high)	-
5 (medium)	1
6 (medium)	-
7 (medium)	1
8 (medium)	-
9 (low)	-
10 (low)	-
11 (low)	-
12 (low)	-
13 (low)	-
Total	**8**

TABLE 12. SIDEWALK BARRIER PRIORITY SCORE DISTRIBUTION

Sidewalk Barrier Priority Score	Miles
5 – No significant Barriers to Access Found	31.0
4 – Minor Barriers to Access Found	48.7
3 – Moderate Barriers to Access Found	40.1
2 – Major Barriers to Access Found	14.2
1 – 10-25% Deteriorated	13.9
0 – More than 25% Deteriorated	10.2
Total	**158.1**

TABLE 13. UNSIGNALIZED INTERSECTION AND DRIVEWAY BARRIER PRIORITY SCORE DISTRIBUTION

Unsignalized Intersection Barrier Priority Score	Intersections
0 (Compliant)	14
1 (High)	77
2 (High)	84
3 (Medium)	200
4 (Medium)	163
5 (Low)	54
Total	**602**

TABLE 14. TRANSIT STOP BARRIER PRIORITY SCORE DISTRIBUTION

Transit Stop Barrier Priority Score	Transit Stops
1 (High)	49
2 (High)	26
3 (Medium)	3
4 (Medium)	44
5 (Low)	-
Total	**122**

3.4 MAINTENANCE VERSUS ALTERATIONS

The United States Department of Justice (DOJ) has issued a briefing memorandum clarifying maintenance versus alteration projects. Information contained in the briefing memorandum is below. It is recommended that this clarification regarding when curb ramp installation is required as part of a project be distributed to the appropriate City of Chicago Heights staff.

> The Americans with Disabilities Act of 1990 (ADA) is a civil rights statute prohibiting discrimination against persons with disabilities in all aspects of life, including transportation, based on regulations promulgated by the United States Department of Justice (DOJ). DOJ's regulations require accessible planning, design, and construction to integrate people with disabilities into mainstream society. Further, these laws require that public entities responsible for operating and maintaining the public rights-of-way do not discriminate in their programs and activities against persons with disabilities. FHWA's ADA program implements the DOJ regulations through delegated authority to ensure that pedestrians with disabilities have the opportunity to use the transportation system's pedestrian facilities in an accessible and safe manner.

FHWA and DOJ met in March 2012 and March 2013 to clarify guidance on the ADA's requirements for constructing curb ramps on resurfacing projects. Projects deemed to be alterations must include curb ramps within the scope of the project.

This clarification provides a single Federal policy that identifies specific asphalt and concrete-pavement repair treatments that are considered to be alterations – requiring installation of curb ramps within the scope of the project – and those that are considered to be maintenance, which do not require curb ramps at the time of the improvement. **Figure 6** provides a summary of the types of projects that fall within maintenance versus alterations.

This approach clearly identifies the types of structural treatments that both DOJ and FHWA agree require curb ramps (when there is a pedestrian walkway with a prepared surface for pedestrian use and a curb, elevation, or other barrier between the street and the walkway) and furthers the goal of the ADA to provide increased accessibility to the public right-of-way for persons with disabilities. This single Federal policy will provide for increased consistency and improved enforcement.

FIGURE 6. MAINTENANCE VERSUS ALTERATION PROJECTS

ADA Maintenance	ADA Alterations
Crack Filling and Sealing	Open-graded Surface Course
Surface Sealing	Cape Seals
Chip Seals	Mill & Fill/Mill & Overlay
Slurry Seals	Hot In-Place Recycling
Fog Seals	Microsurfacing/Thin Lift Overlay
Scrub Sealing	Addition of New Layer of Asphalt
Joint Crack Seals	Asphalt and Concrete
Joint repairs	Rehabilitation and Reconstruction
Dowel Bar Retrofit	New Construction
Spot High-Friction Treatments	
Diamond Grinding	
Pavement Patching	

Source: DOJ Briefing Memorandum on Maintenance versus Alteration Projects

3.5 CLOSING CROSSINGS

PROWAG defines a crosswalk as “that part of a roadway that is located at an intersection included within the connections of the lateral lines of the pedestrian circulation paths on opposite sides of the highway measured from the curbs, or in the absence of curbs, from the edges of the traversable roadway, and in the absence of a pedestrian circulation path on one side of the roadway, the part of a roadway included within the extension of the lateral lines of the pedestrian circulation path at right angles to the center line; or at any portion of a roadway at an intersection or elsewhere distinctly indicated as a pedestrian crossing by pavement marking lines on the surface. Crosswalks at intersections may be marked or unmarked.”

Curb ramps, blended transitions, or a combination of curb ramps and blended transitions should be provided in accordance with PROWAG. If a pedestrian crossing is prohibited or not intended, the crosswalk should be closed in accordance with PROWAG. The requirements are summarized in the sections below.

3.5.1 CROSSWALKS AT INTERSECTIONS

At an intersection corner, one curb ramp or blended transition shall be provided for each crosswalk, or a single blended transition that spans all crosswalks at the intersection corner may be provided. In alterations, where existing physical constraints make compliance with PROWAG technically infeasible, a single curb ramp shall be permitted at the apex of the intersection corner. When alterations are made to crosswalks, curb ramps or blended transitions shall be provided on both ends of the crosswalk where the pedestrian access route crosses a curb.

At an intersection corner where pedestrian crossing is prohibited, curb ramps or blended transitions shall not be provided. The pedestrian circulation path shall be either (a) separated from the roadway with landscaping or other non-prepared surface or (b) separated from the roadway by a detectable vertical edge treatment with a bottom edge 15 inches maximum above the pedestrian circulation path (PROWAG Section R203.6.1.1).

3.5.2 MID-BLOCK AND ROUNDABOUT CROSSWALKS

At a mid-block or roundabout crosswalk, curb ramps or blended transitions shall be provided on both ends of the crosswalk. When alterations are made to crosswalks, curb ramps, or blended transitions shall be provided on both ends of the crosswalk where the pedestrian access route crosses a curb.

At a mid-block or roundabout crosswalk where pedestrian crossing is not intended, curb ramps or blended transitions shall not be provided. The pedestrian circulation path shall be either (a) separated from the roadway with landscaping or other non-prepared surface or (b) separated from the roadway by a detectable vertical edge treatment with a bottom edge 15 inches maximum above the pedestrian circulation path (PROWAG Section R203.6.1.2).

3.6 CONCLUSION

A Self-Evaluation was conducted on the following facilities:

- Eight (8) signalized intersections.
- 158 miles of sidewalk corridors and all unsignalized intersections and driveways along the sidewalk corridors.
- 122 transit stops.

[Remainder of page intentionally left blank]

4.0 FACILITY CONCEPTUAL BUDGET ESTIMATES

4.1 FACILITY CONCEPTUAL BUDGET ESTIMATE OVERVIEW

To identify funding sources and develop a reasonable implementation schedule, conceptual budget estimates were developed for each facility type, based on the facilities evaluated. Conceptual budget estimates for public rights-of-way facilities were based on recent bid tabulations from the Illinois Department of Transportation (IDOT) construction projects. A contingency percentage (20%) was added to the subtotal to account for potential future increases in unit prices, in addition to an engineering design percentage (15%). All costs are in 2025 dollars. **Table 15** provides a summary of the conceptual budget estimates to bring each facility into compliance.

TABLE 15. SUMMARY OF CONCEPTUAL BUDGET ESTIMATES

Facility Type	Total*
Signalized Intersections	$176,500
Public Rights-of-Way Sidewalk	$26,998,000
Public Rights-of-Way Unsignalized Intersections and Driveways	$14,451,500
Transit Stops**	$223,500
City Totals	**$41,849,500**

*Table values are rounded for simplification

**Transit stops owned and maintained by Pace Suburban Bus

It is essential to note that the facility's conceptual budget estimates in **Table 15** only include the budget for remedying accessibility compliance issues as determined by a visual inspection of the facilities. Additional budget considerations should be given to the following:

- Aesthetic upgrades, such as remodeling/upgrading of outdated facilities;
- Current market conditions that may affect the pricing of construction materials and labor, such as COVID-19;
- Construction challenges not visible during inspection, such as underground or in-wall utilities; and
- Other factors that may affect costs.

It is recommended that a design professional assist the City in determining the best overall design solutions concerning various factors, including but not limited to existing conditions, available construction budget, and consideration for all elements that are out of compliance in a particular area of a facility.

4.2 IMPLEMENTATION SCHEDULE

Table 16 details the conceptual budget estimates and proposed implementation schedule by facility type for all City-owned facilities evaluated. Actual annual budgets will vary to accommodate project scopes. For example, all barriers at a single intersection should be

removed within the same project scope. Because conceptual budget estimates vary by intersection, the actual annual budget may vary to accommodate all improvements at an intersection. This ADA Transition Plan will serve as a multi-year plan and will be the blueprint for barrier removal projects for the City. It will be a vital resource for identifying project areas. The City of Chicago Heights reserves the right to change the barrier removal priorities on an ongoing basis to allow flexibility in accommodating community requests, petitions for reasonable modifications from persons with disabilities, and changes in City programs.

The City intends to have its ADA/504 Coordinator work together with department heads and budget staff to determine the funding sources for barrier removal projects.

4.3 FUNDING OPPORTUNITIES

Several alternative funding sources are available to the City to complete the improvements in this Transition Plan. The funding opportunities include applying for resources at the federal, state, and local levels. The following sections detail some different funding source options.

4.3.1 FEDERAL AND STATE FUNDING

The City can apply for federal and state funding through numerous agencies for various improvements. A summary of the available funding opportunities is available on the FHWA website. **Click here for the FHWA Pedestrian Funding webpage**.

Most of these programs are competitive-type grants; therefore, the City of Chicago Heights is not guaranteed to receive these funds. It will be essential for the City to track these programs to apply for the funds. Federal-aid funding programs have specific requirements that projects must meet, and eligibility must be determined on a case-by-case basis.

4.3.2 LOCAL FUNDING

The City has many funding options that will be considered on an annual basis, including CDBG and other grant programs, possible capital expenditures, and potential TIF funding for eligible projects.

5.0 TRANSITION PLAN

Per the ADA Regulations §35.150 Existing Facilities, the City is not required to make structural changes in existing facilities where other methods are effective in achieving compliance. If structural changes to facilities will be undertaken to achieve program accessibility, the City is required to develop a Transition Plan setting forth the steps necessary to complete such changes. The Transition Plan shall, at a minimum:

- Identify physical obstacles in the City's facilities that limit the accessibility of its programs or activities to individuals with disabilities.
- Describe in detail the methods that will be used to make the facilities accessible.
- Specify the schedule for taking the steps necessary to achieve compliance with this section and, if the time period of the Transition Plan is longer than one year, identify steps that will be taken during each year of the transition period. Since the City has responsibility and/or authority over streets, roads, or walkways, a schedule for providing curb ramps or other sloped areas where pedestrian walks cross curbs.
- Indicate the official responsible for the implementation of the plan.

5.1 TRANSITION PLAN REQUIREMENTS

The City has identified the physical obstacles that limit the accessibility of City programs and/or activities to individuals with disabilities (see **Section 3.2 Facilities Review**). Public rights-of-way facility remediations will be completed in accordance with the latest version of PROWAG. After ADA compliance evaluations have been completed, buildings, recreational facilities, and park remediations will be completed in accordance with the latest version of the ADA Standards. Based on the conceptual budget estimates, the transition period will take longer than one year (see **Section 4.0 Facility Conceptual Budget Estimates**). Accordingly, the following steps to achieve compliance will be taken by the City on an annual basis:

1. Verify that all new projects are consistent with the ADA Standards and PROWAG.
2. Determine if barrier removal will be achieved by:
    - Scheduled maintenance program
    - Scheduled improvement projects
3. For improvements that are not scheduled, develop an implementation strategy.

The official responsible for the implementation of the Chicago Heights ADA Transition Plan will be the City's Engineering Department.

5.2 IMPLEMENTATION STRATEGY

To implement improvements that are not included in the City's current CIP, the City has developed an annual implementation strategy. Minimizing risk for pedestrians and providing equitable improvements are the City's goals when determining the order in which to implement facility improvements. Several factors, including the number of existing complaints, barrier

priority, and demographic equity, are considered when determining improvement priority. These factors, as well as others the City might utilize, are described below:

- **Public input** – Receiving and taking into consideration feedback from the public to better understand their concerns is recommended. While formal complaints may not have been filed, areas of public concern are more likely to have a higher risk if no improvements are made where an issue exists.
- **Barrier Priority** – A barrier priority has been assigned to all identified physical barriers. See **Section 3.3** and the detailed project reports for additional details and barrier priority assignments.
    - **Public Rights of Way Facilities:** Barrier priorities are based on severity of non-compliance and proximity to pedestrian attractors (locations near pedestrian attractors such as hospitals, retirement facilities, medical offices, parking garages, major employers, disability service providers, event facilities, bus or transit stop/routes, schools, government and public facilities, parks, libraries, churches) are more likely to have a higher risk compared to those locations without pedestrian attractors. The ADA does not require sidewalks to be installed, but existing sidewalks must be compliant, and the accessible route must be maintained in an accessible condition. Locations with existing sidewalks are at higher risk than those without.
- **Demographic Priority Score** – Certain demographics rely more heavily on pedestrian travel as the main form of transportation, and certain demographics are more heavily impacted by non-compliant facilities than others. Therefore, the City has included demographics-based scoring, utilizing data from 2024 Census Tracts, to help determine the locations where improvements will have a higher impact on disadvantaged demographics. Any facilities located in a Census Tract with a higher concentration of the demographics outlined below can be given higher weights to prioritize their improvements.

  A project implementation and prioritization tool that combines the demographic factors described below with the accessibility compliance prioritization information, as well as public feedback from the outreach methods described in Chapter 2, is provided in **Appendix D**.

    - **Percent of Households Without a Car:** The percentage of households within a given tract that do not have a car. This portion of the population relies heavily on pedestrian facilities within the public ROW for travel.
    - **Percent 65 and Older:** The percentage of the population within a given tract that is over the age of 65. The older-age population is more likely to have mobility issues and would therefore be more likely to be adversely affected by non-compliant facilities.
    - **Percent 18 and Younger:** The percentage of the population within a given tract 18 years of age or younger. These are predominantly school-age children who are more likely to rely on sidewalks to travel to and from school.
    - **Percent With ADA Needs:** The percentage of the population within a given tract with either hearing, vision, cognitive, ambulatory, self-care, or independent living difficulty. This portion of the population is more likely to rely on sidewalks for travel and is therefore more likely to be affected by non-compliance.

- **Percent Below Poverty Level:** The percentage of the population within a given tract that falls below the Federal Poverty Level. This demographic is more likely to rely heavily on pedestrian facilities for travel.
- **Justice40 Census Tract:** Justice40 was a Federal initiative to direct 40% of certain Federal funds to underinvested and overburdened communities. A tract that is identified by Justice40 is weighted more heavily than a tract that is not.

Additional prioritization and implementation factors for consideration are listed below.

- **Number of existing complaints** – The public has already identified locations with complaints as problem areas and should be evaluated as soon as possible to determine if the area(s) of concern comply.
- **Proximity to residential areas** – Locations near residential areas are more likely to have a higher risk than those locations adjacent to industrial areas, where pedestrians are less likely to travel.
- **Number of crashes** – Locations with pedestrian-related crashes should be evaluated to determine if there is a design issue that may be contributing to the crashes (e.g., a push button is not within the required reach range, so pedestrians are not activating the button and crossing the street without a protected phase).
- **Age of facility** – Facilities constructed after July 26, 1991, are a higher risk than those constructed before the 1991 Standards for Accessible Design were published, since they were constructed out of compliance.
- **Street classification** – Arterials typically have higher pedestrian activity than local roadways and may be a higher risk.
- **Pedestrian/vehicle volumes** – Higher pedestrian/vehicle volume roadways are more likely to have a higher risk than lower volume pedestrian/vehicle roadways. Pedestrian volumes may be quantified using indicators such as the number of pedestrian activations at a signalized intersection.
- **Spatial distribution of facilities** – Selecting facilities to be evaluated evenly across different areas of the City might be more well-received by the public, assuming all the risk factors above are equal.
- **Facility type** – Selecting a variety of different facilities (e.g., public rights-of-way, buildings, parks, transit stops) to be evaluated during each phase, instead of all the same facility type, may provide a better understanding of different types of issues that may exist.

The City intends to review the ADA Transition Plan on an annual basis, particularly during the development of the annual budget. The City will consider the factors above in selecting projects with accessibility improvements for implementation.

5.3 REMEDIATION TRACKING AND MONITORING

In accordance with ADA Title II, the City will record progress eliminating accessibility barriers using an ADA Action Log. At a minimum, the Action Log will identify items that are not ADA compliant and will include anticipated completion dates. After the adoption of the Transition Plan by the City Council, the ADA Action Log will be updated on an annual basis. The ADA Action Log should be available upon request. A copy of the current ADA Action Log is provided in **Appendix E**.

6.0 CONCLUSION AND NEXT STEPS

This document serves as the Americans with Disabilities Act (ADA) Self-Evaluation and Transition Plan for the City of Chicago Heights.

The next steps for the City of Chicago Heights are:

1. Complete a Self-Evaluation for all City programs, services, activities, and building, park, and recreation facilities. Facility evaluations should also include the following:
    - Facility reports with the compliance status of each element evaluated based on the 2010 ADA Standards for Accessible Design, and PROWAG;
    - Possible solutions to remove any barriers and bring the element into compliance;
    - Conceptual budget estimates of possible solutions; and
    - Prioritization of the individual facility, independent of other locations of the same facility type.
2. Develop an Implementation Strategy, including a schedule for completing the recommended facility improvements and funding sources to be used.
3. Document current and ongoing ADA remediation efforts to be able to track and monitor the City's progress toward ADA compliance.
4. Continue to update the City's ADA Transition Plan as projects are implemented and requests/grievances are received.
5. Determine the best approach for continuing to receive public input on the ADA Transition Plan over time.

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APPENDIX

Appendix A: Public Outreach

- Public Access Survey and Interactive Map Results
- Public Engagement Events
- In-Person Interviews

Appendix B: Grievance Procedure and Public Notice

- Title II Grievance Procedure
- Title II Grievance Form
- ADA Public Notice

Appendix C: Evaluated Facility Maps

- Signalized Intersections
- Transit Stops
- Public Rights-of-Way Sidewalk Corridors

Appendix D: Project Implementation and Prioritization Tool

- Sidewalk Corridors
- Transit Stops
- Signalized Intersections
- Unsignalized Intersections

Appendix E: ADA Action Log