

City of New Orleans

American with Disabilities Act Transition Plan for Public Rights-of-Way Update



August 2022

This is a living document and will be subject to regular updates.

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Executive Summary

The City of New Orleans, Department of Public Works (DPW), prepared an Americans with Disabilities Act (ADA) Transition Plan for Public Rights-of-Way (ROW) Transition Plan in 2013 to address accessibility needs for persons with disabilities. The Transition Plan was then updated in 2018 to document policy updates and updates to accessible parking accommodations.

The 2022 document includes 1) updates to policy and procedures self-evaluation, 2) reports on progress made in the physical environment; and 3) provides recommendations on how to improve compliance with the US Access Board's Proposed Right of Way Accessibility Guidelines. The Transition Plan is intended to be a living document that identifies deficiencies, tracks progress, and incorporates public feedback. The Plan also informs street construction projects throughout the City of New Orleans.

Transition Plan Overview

The following sections address the efforts by City of New Orleans to document, prioritize, and implement ADA compliance efforts in City-owned rights of way.

Section 1: Introduction – *This section describes the purpose of the Transition Plan and the overview of City of New Orleans roles and responsibilities for complying with the ADA.*

Section 2: DPW ADA Public Engagement – *This section describes the initial efforts in 2011-2012 and more recent re-engagement that was conducted by DPW for the ADA Transition Plans. Key takeaways from the engagement efforts are noted and recommendations reflect the findings from these efforts.*

Section 3: Self-Evaluation – *This section includes the status of recommendations from the 2013 Transition Plan, current asset management efforts, and DPW procedural recommendations. The self-evaluation will be updated periodically as data collections and improvements are completed.*

Section 4: Accessibility Prioritization Methodology – *This section describes the framework for how infrastructure will be prioritized for accessibility improvements. With the Federal guidance on prioritization coupled with stakeholder input, DPW determined priority levels for every intersection in New Orleans to address accessibility needs.*

Section 5: Implementation of Accessibility Improvements – *This section describes the current and planned implementation efforts to remove barriers to access in the ROW across the City of New Orleans.*

Plan Recommendations

Recommendations for improving access in the ROW are documented in each Section. There are twenty-nine (29) recommendations that seek to increase the effectiveness of DPW in addressing barriers to access while also ensuring that compliance to the ADA is met. These recommendations are summarized below by category in chronological order by section. They are not listed in order of priority or importance

SUMMARY OF RECOMMENDATIONS

| Policies & Procedures | | |
|--|--|------------------|
| Recommendation | Milestone/Timeline | Relevant Section |
| Create staff level position in DPW to coordinate all ADA related construction, public requests, staff trainings, and accommodations in the public ROW | Evaluate need for additional resources – 2022 | 1 |
| Expand departmental knowledge and expertise of ADA topics by providing access to trainings & classes | On-going | 1 |
| Provide updates to the MAC by establishing ADA in the ROW as a regular agenda item | Quarterly updates – On-going | 2 |
| Revise DPW (2015) standard detail drawings for curb ramp construction | In progress - 2022 | 2 |
| In coordination with 311, evaluate adding an option to indicate whether the request concerns an accessibility accommodation | Evaluate adding option to indicate access issue - 2022 | 2 |
| Reorganize DPW website to include ADA Frequently Asked Questions (FAQ) | Clarify all accommodation request processes - August 2022 | 2 |
| Increase DPW staffing capacity and capability to enforce permitting standards for alterations in the ROW by other entities and elements added to existing facilities | Evaluate need for additional resources – 2022 | 3 |
| Improve documentation standards for alteration projects to capture key decision making around accessibility compliance and existing constraints or constructability issues | <ul style="list-style-type: none"> Update DPW Standard Operating Procedures – annually; Update ‘Pedestrian General Notes’ to require contractors to seek DPW direction for non-standard intersection treatments - 2022 | 3 |
| Update end of construction close out process to include ADA curb ramp documentation | Update DPW Standard Operating Procedures – annually | 3 |
| Update DPW standards that address accessible on-street parking spaces & passenger loading zones | <ul style="list-style-type: none"> Review and make program improvements – 2022 Draft and approve DPW policy memorandum for installing on-street accessible parking spaces - 2023 | 3 |
| Formally integrate the APS SOP into the ADA Transition Plan and meet the intended upgrade goals annually | SOP Adopted - 2022 /City-wide APS installation completion-2050 | 3 & 5 |
| Evaluate compliance metrics for intersections to include presence/absence of APS at signalized intersections, crosswalk striping, | Develop methodology to determine compliance metrics - 2023 | 3 |

| | | |
|--|--|-------------------------|
| and surface conditions of crosswalk through intersection | | |
| Update grievance procedure content on DPW website | August 2022 | 3 |
| Coordinate prioritization for transit stop accessibility projects with RTA | November 2022 | 3 |
| Continue to seek federal funds for construction projects through LaDOTD & RPC | On-going | 3 |
| Asset Management & Prioritization | | |
| Recommendation | Milestone/Timeline | Relevant Section |
| Aggregate compliance status to include all facility elements to determine intersection status on the Dashboard | Incorporate additional inventories onto Dashboard - 2024 | 5 |
| Group Priority Areas 1-3 into new combined Priority 1R to track curb ramp construction to be completed by 2024 | Priority 1R curb ramp completion - 2024 | 4 |
| Cross reference APS priority list with annual work plan for APS installations | Installations/Upgrades - On-going | 4 |
| As needed, re-prioritize locations with high volume of public accommodation requests sent to 311 into higher priority areas | On-going | 4 |
| All Infrastructure | | |
| Recommendation | Milestone/Timeline | Relevant Section |
| Develop annual inspection and maintenance plan for compliant curb ramps, APS installations, and accessible public parking spaces | Evaluate need for additional resources - 2022 | 3 |
| Update inventory to include T-intersection curb compliant/non-compliant ramps | Dashboard update - 2022 | 3 |
| Building off the 2018 and 2021 maps, establishing automated data update and quality assurance procedures for compliant curb ramps so that the data remain timely and accurate. | On-going | 3 |
| Update 2015 CNO curb ramp details for more specificity around cross & run slopes and construction details | DPW review and update - 2022 | 3 |
| Install curb ramps where ramps are missing or non-compliant as intersections are scheduled for improvement | On-going | 5 |

| | | |
|---|---|---|
| Determine % curb ramps completed within all Priority Areas | Update biannually - starting August 2022 | 5 |
| Scope data collection for pilot sidewalk inventory to include conditions to be mapped on the ADA Compliance Dashboard | Pilot areas initiated - 2022; Establish process for collecting data city-wide based on results of pilot - 2023-2024 | 3 |
| Establish process for data collection of street crossings inventory to include conditions and presence of crosswalk striping to be mapped on the ADA Compliance Dashboard | Scope data collection and evaluation for pilot areas – 2023; Establish process for for collecting data city-wide based on results of pilot - 2024 | 3 |
| Update signalized intersection inventory to include location data for existing pedestrian signals to show progress of APS installation locations | Dashboard update - 2022 | 3 |
| Update parking meter signage to include information about fee waiver for vehicles with accessibility hang-tags or license plates | Develop an anticipated timeline and cost estimates for installing additional signage - 2022 | 3 |

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1.0 Introduction

1.1 Purpose of the Americans with Disabilities Act Transition Plan for Public Rights-of-Way Update

The federal statute known as 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, and access to public accommodations, transportation, and telecommunications.

The public right-of-way (ROW) refers to:

- Sidewalks
- Neutral ground areas
- Walking paths
- Streets

The purpose of the Transition Plan and subsequent Plan Updates is to ensure that facilities for pedestrian circulation and use, located in the public ROW, are periodically evaluated such that facilities are readily accessible to and usable by pedestrians with disabilities.

1.2 Overview of the ADA and City responsibilities under Title II

As the entity responsible for authorizing the planning, design, construction, operation, and maintenance of the public ROW and related activities, the Department of Public Works (DPW) is required to identify and remove physical as well as programmatic barriers for equal access in the ROW according to Title II of the Americans with Disabilities Act (ADA). Title II of the ADA specifically refers to state and local government programs, services and activities.

Furthermore, Title II of the ADA (28 CFR Part 35.150(d))¹ requires that state and local entities develop a Transition Plan specific to the entities' facilities:

(d) Transition plan.

(1) In the event that structural changes to facilities will be undertaken to achieve program accessibility, a public entity that employs 50 or more persons shall develop, within six months of January 26, 1992, a transition plan setting forth the steps necessary to complete such changes. A public entity shall provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the development of the transition plan by submitting comments. A copy of the transition plan shall be made available for public inspection.

(2) If a public entity has responsibility or authority over streets, roads, or walkways, its 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

¹ Title II, 28 CFR Part 35 (2010) – Nondiscrimination on the Basis of Disability in State and Local Government Services.

the Act, including State and local government offices and facilities, transportation, places of public accommodation, and employers, followed by walkways serving other areas.

(3) The plan shall, at a minimum—

(i) Identify physical obstacles in the public entity's facilities that limit the accessibility of its programs or activities to individuals with disabilities;

(ii) Describe in detail the methods that will be used to make the facilities accessible;

(iii) Specify the schedule for taking the steps necessary to achieve compliance with this section and, if the time period of the transition plan is longer than one year, identify steps that will be taken during each year of the transition period; and

(iv) Indicate the official responsible for implementation of the plan.

(4) If a public entity has already complied with the transition plan requirement of a Federal agency regulation implementing section 504 of the Rehabilitation Act of 1973, then the requirements of this paragraph (d) shall apply only to those policies and practices that were not included in the previous transition plan.

1.3 Proposed Guidelines for Pedestrian Facilities in the Public ROW (PROWAG)

The U.S. Access Board released proposed guidelines in 2011 for identifying, assessing, and addressing accessibility deficiencies in the public ROW. The Proposed Guidelines for Pedestrian Facilities in the Public ROW (PROWAG) aims to provide standards for newly built or altered pedestrian facilities that ensures access for people with disabilities. The PROWAG does not apply to existing pedestrian facilities unless the facilities are included within the scope of an alteration undertaken at the discretion of DPW or other covered entities. The PROWAG further defines alteration as:

“a change to a facility in the public right-of-way that affects or could affect pedestrian access, circulation, or use. Alterations include, but are not limited to, resurfacing, rehabilitation, reconstruction, historic restoration, or changes or rearrangement of structural parts or elements of a facility.”²

Although the PROWAG is not finalized as of the update to this Transition Plan, the accessibility standards contained in the PROWAG will become mandatory when the guidelines are adopted, with or without additions and modifications, as accessibility standards in regulations issued by other federal agencies implementing the Americans with Disabilities Act, Section 504 of the Rehabilitation Act, and the Architectural Barriers Act.

² US Access Board, (Proposed) Public Rights-of-Way Accessibility Guidelines. (2011). R105 - Definitions.

1.4 DPW Transition Plans³ and Update Process

The City of New Orleans, DPW, prepared an ADA Public ROW Transition Plan in 2013 to address accessibility needs for persons with disabilities in the City in accordance with the ADA and the U.S. Access Board’s PROWAG. Development of the Transition Plan was overseen by DPW and the Mayor’s Advisory Council for Citizens with Disabilities to ensure consultation and involvement of key stakeholders in the planning process. The Transition Plan was organized to address the PROWAG scoping and technical requirements where appropriate and set priorities to update pedestrian access routes along City-owned streets with improvements such as:

- Curb ramps;
- Accessible pedestrian signals; and
- Accessible parking zones.

A brief history of the City’s efforts to address accessibility deficiencies in City-maintained public right-of-way is provided in Table 1.

| | |
|------------|--|
| 7/26/1990 | ADA becomes law |
| 7/17/2002 | Access Board issued draft guidelines for public ROW (2002) |
| 11/23/2005 | Access Board issued final draft guidelines for public ROW (2005) |
| 7/26/2007 | Amended settlement agreement (DOJ & CNO; 2007) |
| 8/19/2010 | DPW updates standard details for curb ramps (2010) |
| 7/26/2011 | Access Board issued proposed guidelines for public ROW (2011) |
| 6/15/2013 | DPW issued ADA Transition Plan for Public Rights of Way (2013) |
| 2/3/2015 | DPW updates standard details for curb ramps (2015) |
| 11/5/2015 | City updated municipal code for corner sidewalk cuts or restoration (2015) |
| 3/7/2018 | DPW updated Transition Plan (Appendix I; 2018) |

Table 1 – Key Milestones

The City of New Orleans Department of Streets began constructing pedestrian curb ramps before the 2011 PROWAG were built to be consistent with the design criteria of that time. However, ongoing modifications to the national guidance has resulted in pedestrian curb ramps that no longer comply or meet best practices for curb ramp design as established in the 2011 PROWAG. Due to existing site and scope constraints, it may not be feasible to meet the PROWAG at some locations. The 2011 PROWAG is currently the standard by which the City of New Orleans assesses compliance with the ADA for pedestrian facilities within public rights-of-way.

³ City of New Orleans (2018), <https://www.nola.gov/dpw/documents/ada-transition-plan-3-7-18-update/>

The 2022 Plan Update updates the DPW self-evaluation for policies and reports with DPW’s progress on compliance measures originally recommended in the 2013 Transition Plan. This updated plan is intended to be a living document in which regular updates on deficiencies are further identified, reporting on barriers to access that are removed in the public ROW, and public feedback is regularly incorporated. Moreover, this plan is to serve as a basis for planning efforts for ROW projects in the City of New Orleans. DPW intends to update progress on a biannual basis.

1.5 Responsible Public Official

The official responsible for implementation of the Transition Plan is:

Director of Public Works
 City of New Orleans
 1300 Perdido St., Rm 6W03
 New Orleans, LA 70112
 (504) 658-8000

RECOMMENDATIONS

| No. | Category | Description | Milestone/ Timeline |
|-----|---------------------------|---|---|
| 1.1 | DPW Policies & Procedures | Create staff level position in DPW to coordinate all ADA related construction, public requests, staff trainings, and accommodations in the public ROW | Evaluate need for additional resources – 2022 |
| 1.2 | DPW Policies & Procedures | Expand departmental knowledge and expertise of ADA topics by providing access to trainings & classes | On-going |

2.0 DPW ADA Public Engagement

2.1 Role of the DPW ADA Advisory Committee

In 2010, DPW worked with the Office of the Mayor’s ADA Administrator to establish a DPW ADA Advisory Committee to ensure that key stakeholders were directly informing the planning process. The Committee met regularly from August 2010 to October 2011 to advise and review the planning process for the DPW Transition Plan including the development of priority areas for removing barriers throughout the City of New Orleans. The feedback provided by this committee is still relevant and serves as a basis for the current Plan Update. See Appendix A for Summary of Recommendations from 2013 Transition Plan with current status.

In August 2021, DPW reinitiated efforts with the Mayor’s ADA Office (ADA Coordinator) to convene a focus group to provide input on efforts to update the 2018 ADA Transition Plan for Public Rights-of-Way.

A request for participation in a virtual meeting was sent to the Mayor’s Advisory Council for Citizens with Disabilities (MAC).

During the November 2021 virtual meeting, feedback was requested from the six (6) participants about specific mobility challenges in the built environment, DPW communications – including website content, data sources, and regular updates – as well as the development of an ADA Dashboard to map accessibility features throughout the City of New Orleans. See Appendix C for meeting attendees and minutes.

2.2 Stakeholder Representation

Stakeholders have been crucial in guiding the development of the original Transition Plan and subsequent Plan Updates. With the advisement of the ADA Coordinator, key groups and individuals were identified to solicit feedback and participate in the development of the Transition Plan. Partner agencies were also a consulted for feedback and improve coordination for ADA improvements in the ROW.

| Groups & Individuals | Partner Agencies |
|--|--|
| <p data-bbox="318 856 755 957"><i>New Orleans residents and advocacy organizations were invited to participate in the Transition Plan development</i></p> <ul data-bbox="318 982 732 1444" style="list-style-type: none"><li data-bbox="318 982 643 1016">• Lighthouse of Louisiana<li data-bbox="318 1045 672 1079">• ARC Greater New Orleans<li data-bbox="318 1108 613 1142">• The Advocacy Center<li data-bbox="318 1171 724 1205">• LSUHSC Occupational Therapy<li data-bbox="318 1234 732 1268">• American Diabetes Association<li data-bbox="318 1297 646 1331">• Alzheimer’s Association<li data-bbox="318 1360 586 1394">• Children’s Hospital<li data-bbox="318 1423 578 1457">• RIDE New Orleans | <p data-bbox="865 856 1247 957"><i>Staff from public agencies provided input in the Transition Plan development</i></p> <ul data-bbox="865 982 1219 1180" style="list-style-type: none"><li data-bbox="865 982 1211 1016">• New Orleans Health Dept<li data-bbox="865 1045 1122 1117">• New Orleans ADA Coordinator<li data-bbox="865 1146 1219 1180">• Regional Transit Authority |

Additionally, DPW sought counsel from the Southwest ADA Center for the 2022 Plan Update. The Center's mission is to “promote voluntary compliance with the Americans with Disabilities Act (ADA) by providing three core services — technical assistance, training and materials dissemination.”⁴ The Southwest ADA Center is a resource to municipalities in Louisiana for ADA related guidance. DPW consulted with the Center specifically on improving the internal documentation processes for tracking ADA improvements in the ROW.

⁴ Southwest ADA Center (2022). <https://www.southwestada.org>

2.3 Engagement Opportunities

Due to the lack of substantive engagement and lag in reporting on the 2013 Transition Plan recommendations, public input was not solicited until the recent efforts in 2021. With the intent to reinvigorate the DPW commitment to periodic updates to the Plan, the City's ADA Coordinator assisted with direct outreach to stakeholders and a virtual public meeting was held. The public meeting was held in February 2022 and promoted by the Mayor's Neighborhood Engagement Office (NEO), City of New Orleans communications, and the DPW Mobility & Safety social media channels. This meeting also marked the public launch of the Accessibility Dashboard and interactive map for use and review. This map was created to show pedestrian accessibility infrastructure throughout the city.

February 2022 Meeting - Key Details

- Approximately 50 participants on the Zoom meeting hosted by NEO
- DPW's Mobility & Safety Division presented on the efforts to remove barriers in the public ROW across New Orleans highlighting the FEMA-funded Joint Infrastructure Road Recovery program that is addressing approximately 40% of non-compliant curb ramps throughout the City
- Public launch of the DPW ADA Interactive Map - a mapping tool that demonstrates current status of all curb ramps throughout the City of New Orleans as well as other pertinent accessibility features. See *Section 3.1 Asset Management – Mapping Inventory Data*
- A recording of the meeting and a copy of the presentation are available on the DPW website

2.4 Public Review and Comments

Prior to releasing the original Transition Plan document in June 2013, the draft Plan was available for public review on the DPW website. No comments were received at that time.

In re-engaging with key stakeholders in November 2021 and hosting a public meeting in February 2022, common themes were expressed by participants. The expectation is for DPW to be more accountable with regular updates to residents and improving access to publicly available information.

2021/2022 Outreach Efforts - Key Takeaways

- Clarify how to make accessibility requests on the DPW website (e.g. parking accommodations)
- Report DPW progress on compliance with biannual updates to the ADA Dashboard
- Improve DPW grievance procedure for ADA accommodation requests
- Enforce compliant curb ramp construction for all alteration and new construction projects

RECOMMENDATIONS

| No. | Category | Description | Milestone/Timeline |
|-----|---------------------------|---|--|
| 2.1 | DPW Policies & Procedures | Provide updates to the MAC by establishing ADA in the ROW as a regular agenda item | Quarterly updates – On-going |
| 2.2 | DPW Policies & Procedures | Revise DPW (2015) standard detail drawings for curb ramp construction | 2022 |
| 2.3 | DPW Policies & Procedures | In coordination with 311, evaluate adding an option to indicate whether the request concerns an accessibility accommodation | Evaluate adding option to indicate access issue - 2022 |
| 2.4 | DPW Policies & Procedures | Reorganize DPW website to include ADA Frequently Asked Questions (FAQ) | Clarify all accommodation request processes - 2022 |
| 2.5 | All infrastructure | Bi-annual progress tracking updates for curb ramp construction, APS installations and accessible parking zone additions | Dashboard updates - On-going |

3.0 Self-Evaluation

As stated in Section 1.2, DPW is to periodically conduct self-evaluations to document progress and identify deficiencies found in the ROW. This section includes the status of recommendations from the 2013 Transition Plan, current asset management efforts, and DPW procedural recommendations (more information on infrastructure improvements is included in Section 5.0). This self-evaluation will be updated periodically as data collections and improvements are completed.

3.1 Asset Management – Mapping Inventory Data

Every street intersection within Orleans Parish is included in 2018 source data developed by the DPW Project Controls group to identify and catalog intersection locations within CNO Public ROW. Mapping each intersection, instead of each ramp, prevents map overplotting (i.e., when map features are so crowded that they overlap). This intersection data will continue to be included in all new mapping tools.

Survey Methodology: Every street intersection in Orleans Parish was visually inspected in 2018 as part of a baseline data collection effort to determine if curb ramps with detectable warning panels were present. Because detectable warning panels with PROWAG-compliant truncated domes are the most recent guidance under PROWAG, the Presence of this feature is an indication of compliance with the 2011 PROWAG. Each intersection in the database contains information about its individual curb ramps to define the intersection status as either “Compliant,” “Partially Compliant,” or “Non-compliant.” The compliance metric is directly correlated to the presence of curb ramps with detectable warning panels. The “Partially Compliant” status indicates that some but not all ramps at that intersection are compliant.

The ADA compliance mapping is progressing in two major stages:

1. Providing publicly accessible maps to show the 2018 upgrade priorities and the accessibility of the network as of 2018, and as of the end of 2021, the planned point-in-time for mapping in the first biannual compliance report. **Completed - January 2022**
2. The Department of Public Works (DPW) Project Controls Division conducted a review of the as-built curb ramp infrastructure in June 2022, as an update to the 2018 data. Building off the 2018 and 2022 maps, establishing automated data update and quality assurance procedures so that the data remain timely and accurate. Establishing sustainable data collection and mapping methodologies to automate the process of incorporating changes into the online mapping tools. **Timeframe - 2023**

In the long term, continued improvements in DPW’s asset management capabilities will allow information about more types of infrastructure (e.g., sidewalk conditions) to be joined into one single intersection-level map. Additionally, as inventories are collected and deficient infrastructure is addressed, the updates will be documented in future Plan Updates.

3.2 Updates to 2013 Self-Evaluation

Curb Ramps: The City of New Orleans has jurisdiction over approximately 11,000 intersections and ADA compliance is documented on the publicly available Accessibility Dashboard Interactive Map on the DPW website (www.nola.gov/dpw). This map was created to show pedestrian accessibility infrastructure throughout the city. Compliance status of every street intersection within Orleans Parish as of the 2018 inventory, as well as for the 2022 inventory, will be the current measures of ADA compliance for the online mapping tool. See Appendix D for more information about Accessibility Dashboard features.

This tool serves as the DPW public accountability site for tracking progress and documenting areas in need of improvements. Curb ramps' prioritization for targeted upgrades, as well as ramps' most recently visually self-evaluated compliance with the ADA, are the primary features shown on this map. See Appendix E for 2022 intersection compliance status.

Design & Construction: The 2013 Transition Plan cited recommended actions for DPW to pursue in the effort to align with PROWAG requirements. Table 2 shows the updated CNO details and specifications for the categories noted and identified in the 2013 Plan:

| Category | Standard Detail Update |
|--------------------------|--|
| Design/Construction | CNO revised city code to address curb ramp construction; DPW updated design specifications to require standards aligned with PROWAG tech requirements for ramp & sidewalk installations (2015) |
| Pedestrian Access Routes | DPW updated ramp / intersection layout / detectable warning strip standard details (Dwg No. ADA1-4, 2015) |
| Handrails | Pedestrian Facilities General Notes updated (Dwg No. ADA2, 2015) |

| | |
|-------------------------------------|---|
| Signs | DPW General Specifications - signage to conform to DOTD Traffic control requirements and MUTCD (Section C129, 2015) |
| Protruding Objects/Street Furniture | Pedestrian Facilities General Notes updated (Dwg No. ADA2, 2015) |

Table 2 – DPW Standard Detail Updates

As recommended in the February 2022 meeting, DPW is updating the CNO standard details for ADA compliance at curb ramps and transitions to clarify the standards and expectations for compliant cross slopes, runs, transition areas, and expansion joint placement (See Recommendation 2.2). Additionally, DPW drafted Standard Operating Procedures (SOP) for APS installations and retrofitting existing pedestrian signals to require all signalized intersections to be upgraded with APS technology. See Appendix H – Accessible Pedestrian Signals Standard Operating Procedures.

The statuses for recommendations on the below elements are shown in Appendix A - CNO ADA Transition Plan for Public Rights of Way, Summary of 2013 Recommendations.

- Alterations and Elements Added to Existing Facilities
- Pedestrian Street Crossings
- APS & Pedestrian Pushbuttons
- Transit Stops & Transit Shelters
- On-Street Parking Spaces

RECOMMENDATIONS

| No. | Category | Description | Milestone/ Timeline |
|-----|-------------------------------------|---|---|
| 3.1 | Sidewalks & Street Crossings | Scope data collection for pilot sidewalk inventory to include conditions to be mapped on the ADA Compliance Dashboard | Pilot areas initiated - 2022; establish process for collecting data city-wide based on results of pilot - 2023-2024 |
| 3.2 | Sidewalks & Street Crossings | Establish process for data collection of street crossings inventory to include conditions and presence of crosswalk striping to be mapped on the ADA Compliance Dashboard | Scope data collection and evaluation for pilot areas – 2023; Establish process for collecting data city-wide based on results of pilot - 2024 |
| 3.3 | Accessible Pedestrian Signals (APS) | Update signalized intersection inventory to include location data for existing pedestrian signals to show progress of APS installation locations | Dashboard update - 2022 |
| 3.4 | Curb Ramps | Update inventory to include T-intersection compliant/non-compliant curb ramps | Dashboard update - 2022 |

3.3 DPW Procedural Self-Evaluation

As part of the Transition Plan Update, procedures related to ADA compliance across five divisions of DPW were assessed. These divisions include Maintenance, Parking, Traffic, Engineering, & Street Lights.

DPW recently absorbed the Ground Transportation Bureau in 2021. Private transportation businesses are obligated under the ADA Title III to provide readily accessible vehicles for individuals with disabilities. DPW is currently reviewing the ADA Title III requirements for private transportation businesses to ensure compliance with the law.

The below recommendations reflect the recent internal audit performed for this Plan Update.

RECOMMENDATIONS

| No. | Category | Description | Milestone/ Timeline |
|-----|---------------------------|--|---|
| 3.5 | Curb ramps | Building off the 2018 and 2021 maps, establishing automated data update and quality assurance procedures for compliant curb ramps so that the data remain timely and accurate. | On-going |
| 3.6 | Curb ramps | Update 2015 CNO curb ramp details for more specificity around cross & run slopes and construction details | DPW review & update - 2022 |
| 3.7 | DPW Policies & Procedures | Increase DPW staffing capacity and capability to enforce permitting standards for alterations in the ROW by other entities and elements added to existing facilities | Evaluate need for additional resources – 2022 |
| 3.8 | DPW Policies & Procedures | Improve documentation standards for alteration projects to capture key decision making around accessibility compliance and existing constraints or constructability issues | <ul style="list-style-type: none"> • Update DPW Standard Operating Procedures – annual; • Update ‘General Notes’ to require contractors to seek DPW direction for non-standard intersection treatments - 2022 |
| 3.9 | DPW Policies & Procedures | Update end of construction close out process to include ADA curb ramp documentation | Update DPW Standard Operating Procedures – annually |

| | | | |
|------|---|--|--|
| 3.10 | DPW Policies & Procedures/Parking | Update DPW standards that address accessible on-street parking spaces & passenger loading zones | <ul style="list-style-type: none"> Review and make program improvements – 2022 Draft and approve DPW policy memorandum for installing on-street accessible parking spaces - 2023 |
| 3.11 | DPW Policies & Procedures / Accessible Pedestrian Signals (APS) | Formally integrate the APS SOP into the ADA Transition Plan and meet the intended upgrade goals annually | SOP Adopted - 2022 /City-wide APS installation completion-2050 |
| 3.12 | DPW Policies & Procedures | Reevaluate compliance metrics for intersections to include presence/absence of APS at signalized intersections, crosswalk striping, and surface conditions of crosswalk through intersection | Develop methodology to determine compliance metrics - 2023 |
| 3.13 | Parking | Update parking meter signage to include information about fee waiver for vehicles with accessibility hangtags or license plates | Develop an anticipated timeline and cost estimates for installing additional signage - 2022 |
| 3.14 | All Infrastructure | Develop annual inspection and maintenance plan for compliant curb ramps, APS installations, and accessible public parking spaces | Evaluate need for additional resources - 2022 |

3.3 Grievance Procedure

The 2013 Transition Plan established a DPW five-step grievance procedure which includes a process for escalating the review for accommodation. The accommodation request for city owned right of way is to be initially sent to DPW via 311 or written request with a final determination, if requested by the complainant, to be determined by the Chief Administrative Officer (CAO). The duration for the overall procedure is approximately 180 days. As per the feedback from 2022 outreach efforts, this process is clarified and described on the DPW website with relevant forms available for download. See Appendix B for Grievance Procedure steps.

For state owned right of way within the City of New Orleans, requests for accommodation should be sent to the Louisiana Department of Transportation and Development (LaDOTD) Headquarters

ADA Program Manager either by phone (225)-379-1923 or written request through the LaDOTD ADA Program website⁵.

For transit related accommodations, contact the Regional Transit Authority by filling out an ADA Discrimination Complaint Form. Forms and process information are available online at the agency’s website www.norta.com or by request at RTA, 2817 Canal St., New Orleans, LA 70119, (504) 827-8345.

RECOMMENDATIONS

| No. | Category | Description | Milestone/Timeline |
|------|---------------------------|---|--------------------|
| 3.15 | DPW Policies & Procedures | Update grievance procedure content on DPW website | August 2022 |

3.4 Coordination with other Public Entities’ Accessibility Efforts in CNO

Regional Transit Authority (RTA): As of 2017 and under the Settlement Agreement of Falls v. RTA, it was determined that CNO & RTA shall submit a plan and schedule by November 30, 2022, in which all noncompliant transit stops are to be brought into compliance with the ‘applicable federal laws and regulations.’ There are an estimated 2,092 transit stops that require improvements in order to be made ADA compliant with applicable federal standards for public transit stops based on the Bus Stop Accessibility Survey conducted in 2015.

The intent is to align transit stop improvement priorities with the priority areas established in the 2013 Transition Plan. Additionally, CNO is responsible for all repairs related to the “Access to Stop” issues as defined in the 2015 Survey. The Agreement states that all the stops are to be brought into compliance by November 30, 2031.

RECOMMENDATIONS

| No. | Category | Description | Milestone/Timeline |
|------|---------------------------|--|--------------------|
| 3.16 | DPW Policies & Procedures | Coordinate prioritization for transit stop accessibility projects with RTA | November 2022 |

Louisiana Department of Transportation and Development (LaDOTD): The LaDOTD released an ADA Transition Plan in 2018. As part of the Transition Plan, LaDOTD surveyed all state-controlled ROW and determined ADA deficiencies in the pedestrian access routes. This includes 102 miles of ROW within Orleans Parish, which excludes interstate and expressway mileage. The Transition Plan identifies that each district throughout Louisiana has a designated ADA Liaison who may be contacted to help assist with ADA concerns or inquiries about specific locations. LADOTD has established a construction program to address ADA deficiencies through stand-alone projects in addition to addressing deficiencies as part of other construction projects. The program is funded at \$3 million annually. A Program Manager has been designated by LADOTD’s Administration.

⁵ Louisiana Department of Transportation, (2022). http://wwwsp.dotd.la.gov/Inside_LaDOTD/Divisions/Administration/Compliance/Pages/ADA_Prog.aspx

| | |
|--|-----|
| LaDOTD mileage (mi) | 102 |
| LaDOTD Intersections - Unsignalized (#) | 648 |
| LaDOTD Intersections – Signalized (#) | 164 |

Table 3 – State owned ROW data for Orleans Parish

Additionally, as of January 2020, LaDOTD established a new traffic signal policy stating that, “All new traffic signals and all upgraded traffic signals via either construction project, permit or in house staff shall have accessible pedestrian signals (APS) and detectors installed if a sidewalk with tactile warnings are in place.” The installation and maintenance of the pedestrian signals on state-owned roads and interchanges with CNO will be managed by LaDOTD as per this traffic signal policy.

Furthermore, LaDOTD partners with DPW to administer Federal Highway Administration (FHWA) funding for eligible local roads. These state projects on CNO-owned roads address road surface issues and ADA compliance for pedestrian routes with a typical duration of approximately 5 years from planning to end of construction. The funding for construction is cost shared between CNO and the federal government with the majority (80%) funded through FHWA.

The following FHWA funding programs are available through LaDOTD:

- Transportation Alternatives Program
- Local Roads Safety Program
- Safe Routes to Public Places Program
- Recreational Trails Program
- Off-System Bridge Program
- Surface Transportation / Urban Systems Program

Regional Planning Commission (RPC): The RPC is the Greater New Orleans Metropolitan Planning Organization (MPO) and is the forum for cooperative transportation decision-making for Greater New Orleans. A MPO must be designated for each urbanized area with a population of more than 50,000 by agreement between the Governor and units of general-purpose local government that together represent at least 75% of the affected population.

The RPC Policy Committee is the decision-making body regarding Surface Transportation / Urban Systems projects within the Greater New Orleans area. The locations and priorities are determined by DPW annually in conjunction with the RPC. The RPC then works with the LaDOTD Planning Section to determine projects to be funded. All federally funded projects are to comply with the ADA and thus include compliance improvements for sidewalks and curb ramps within the project areas.

This category of funding encompasses many different types of projects with variable annual funding available for the proposed improvements. Some of the projects that have been completed by this program include reconstruction of existing routes, overlaying existing routes, adding capacity to existing

routes, computerized signal systems, construction or reconstruction of bridges and construction of sidewalks and bike paths.

RECOMMENDATIONS

| No. | Category | Description | Milestone/Timeline |
|------|---------------------------|---|--------------------|
| 3.17 | DPW Policies & Procedures | Continue to seek federal funds for construction projects through LaDOTD & RPC | On-going |

Permitted Work in the Public ROW: Ordinance Number 26646, Chapter 1, Section 146-448 was passed in 2015 which updates the City code to require the installation of ADA-compliant ramps for all sidewalk and restoration work at corners as per DPW standards. However, DPW is limited in the ability to enforce permitting standards for alterations in the ROW by other entities and elements added to existing facilities. To clarify the enforcement mechanisms available to the Department, DPW has requested an ordinance for consideration at City Council to deputize staff members to enable enforcement actions. This ordinance will clarify the law and how violations are to be determined.

RECOMMENDATIONS

| No. | Category | Description | Milestone/Timeline |
|-----|---------------------------|--|---|
| 3.7 | DPW Policies & Procedures | (RESTATED FROM SECTION 3.3) Increase DPW staffing capacity and capability to enforce permitting standards for alterations in the ROW by other entities and elements added to existing facilities | Evaluate need for additional resources – 2022 |

4.0 Accessibility Prioritization Methodology

The ADA (28 CFR 35.150(d-2)) stipulates that agencies give priority to “walkways serving entities covered by the Act, including state and local government offices and facilities, transportation, places of public accommodation, and employers, followed by walkways serving other areas.” With this guidance coupled with stakeholder input, DPW determined priority levels for every intersection in New Orleans to address accessibility needs.

4.1 Summary of Curb Ramp Priority Areas - 2013

In the 2013 Plan and 2018 Plan Update, all ramps within Orleans Parish were categorized on a 1 to 6 scale to reflect prioritization for upgrades based on the criteria established in ADA and PROWAG. The 2018 update delineates three major groups of projects selected by the RPC:

- Tier I: Federally aided major roadways; roadways serving state and local government buildings and services; major commercial centers; and roadway segments serving transit
- Tier II: Major roadways outside of the Federal Aid network; roadways serving

- employment and retail sites not in Tier 1; and multifamily housing complexes*
- *Tier III: Residential, industrial and other areas not covered in the first two tiers”*

The primary data from which pedestrian infrastructure was categorized into these three broad groups was based on land uses, increasing priority in areas with higher levels of pedestrian foot-traffic, public transit, and essential services. These weighted land use priorities are shown in Table 4. It is important to note that these land use priorities are only one piece of the RPC prioritization formula. Pedestrian infrastructure upgrades were also prioritized based on the specific requirements and language used in the ADA (1990) and in PROWAG (2011).

| Land Use | Number of Locations | Weight |
|---|---------------------|------------------------------------|
| RTA fixed route bus and streetcar stops | 2451 | 0-9 (based on ridership) |
| Employment locations | 1968 | 2-6 (based on # of jobs per block) |
| Paratransit drop-off locations | 224 | 1-6 (based on ridership) |
| NORD facilities and parks | 205 | 3 |
| Voting Sites | 122 | 3 |
| Public Schools | 93 | 3 |
| Health Clinics | 50 | 3 |
| Government offices | 36 | 3 |
| Tourist attractions | 29 | 3 |
| Senior centers | 22 | 3 |
| Large groceries | 21 | 3 |
| Hospitals | 14 | 3 |
| Colleges and universities | 10 | 3 |
| Major streets | n/a | 3 |
| Commercial Districts | 268 | 2 |
| Small groceries | 23 | 2 |
| Libraries | 17 | 2 |
| Public housing sites | 9 | 2 |

Table 4 – Land Use Priorities as Identified in 2013 ADA Transition Plan Update

While the land use formula is still broadly applicable to prioritizing ramp and other pedestrian infrastructure upgrades, it reflects the state of pedestrian infrastructure as of 2013 and does not consider pedestrian and other transit infrastructure upgrades made since, nor does it reflect changes to locations to the types of facilities listed in Table 4. With this known constraint, DPW is utilizing the 2013 Priority Areas to determine progress of curb ramp installations in comparison to the timelines outlined in the Original Plan. See section 5.1 Curb Ramp Installations by Priority Area.

RECOMMENDATIONS

| No. | Category | Description | Milestone/Timeline |
|-----|----------------|--|---|
| 4.1 | Prioritization | Group Priority Areas 1-3 into new combined Priority 1R to track curb ramp construction to be completed by 2024 | Priority 1R curb ramp completion - 2024 |

4.2 Priority APS Intersections – 2022

There are approximately 648 signalized intersections throughout New Orleans. As stated in Section 2, LaDOTD is responsible for 164 signalized intersections. Thus, the City of New Orleans is responsible for 298 signals throughout the City. Of the total 462 intersections throughout the City, approximately 20% have pedestrian signals and, currently, one (1) of those locations is equipped with operational APS.

Starting in 2021 and in collaboration with the Lighthouse of Louisiana, DPW identified city- and state-run intersection priorities for APS installations. The identified intersections are key locations across the city that provide direct access to hospitals, grocery stores, commercial corridors, and high-volume intersections and have been noted as Priority 1 areas as per the original Transition Plan. The priority locations determined by direct stakeholder engagement are as follows:

- S Carrollton & Palmetto
- S Carrollton & Tulane
- Washington & Broad
- Prytania & Louisiana
- St Charles & Louisiana
- Poydras & O’keefe
- Poydras & Loyola
- Canal & N Rampart
- Canal & Magazine
- Canal & Camp
- Paris/Gentilly/St Bernard
- Belle Chasse Hwy & Wall Blvd
- General De Gaulle & Holiday
- Read Blvd & Lake Forest
- Read & I-10
- Read & Morrison

It is important to note that some of these locations do not currently have pedestrian signals. Therefore, upgrades will require the installation of both pedestrian signals and accessible features simultaneously. The locations for current pedestrian signals are to be incorporated into the ADA Dashboard.

RECOMMENDATIONS

| No. | Category | Description | Milestone/Timeline |
|-----|----------------|---|-----------------------------------|
| 4.2 | Prioritization | Cross reference APS priority list with annual work plan for APS installations | Installations & Upgrades/On-going |

4.3 Accommodation Requests

Public requests for accommodation sent via 311 are filtered to the appropriate contacts within DPW to inspect, review, document, and recommend for action. Inspections in the public ROW are conducted daily across the City. The typical volume per district is 12 – 15 requests daily. DPW inspectors are responding to approximately 95% of daily requests. The following process occurs following inspection:

- 311 is notified that the area is inspected & reviewed – *a recent improvement in 311 functions (May 2022) pushes the notification of inspection to the individual who requested action*

- Pictures taken in field – identification and documentation within 5 days
- Planned roadwork projects are referenced for issue to be addressed in upcoming projects
- If area is not scheduled for improvement within an upcoming project and action is recommended, the issue is either:
 - Sent to the Maintenance Division to perform ADA ramp improvements on a limited basis when intersection maintenance is performed as per city code.
 - Sent to the Engineering Division to be incorporated into a future capital improvement project.

Accommodation requests sent to 311 are now plotted on the ADA Dashboard to provide further information for planning and scoping future projects to address barriers in the public ROW.

RECOMMENDATIONS

| No. | Category | Description | Milestone/Timeline |
|-----|---------------------------|--|---|
| 4.3 | Prioritization | As needed, re-prioritize locations with high volume of public accommodation requests sent to 311 into higher priority areas | On-going |
| 1.1 | DPW Policies & Procedures | (RESTATED FROM SECTION 1.5) Create staff level position in DPW to coordinate all ADA related construction, public requests, staff trainings, and accommodations in the public ROW | Evaluate need for additional resources – 2022 |

5.0 Implementation of Accessibility Improvements

This section describes how infrastructure improvements are made in the City of New Orleans public right of way. Based on the pedestrian curb ramp inventory and evaluation described in Sections 3 and 4, there are approximately 8,500 intersections within the City of New Orleans that need improvement to satisfy PROWAG guidance for pedestrian curb ramps. There are approximately 400 signalized intersections that require APS upgrades. This includes intersections within LaDOTD right of way. The implementation of intersection improvements are tracked in the LaDOTD ADA Transition Plan as described in Section 3, though overall intersection compliance is also tracked by DPW. Additionally, through multiple funding sources, the construction of compliant sidewalks are underway. More data collection for tracking existing conditions of sidewalks is required as stated in Section 3.

5.1 Curb Ramp Installations by Priority Area

By comparing 2018 intersection-level compliance with 2022 intersection-level compliance, we can see the changes in the “fully compliant” intersection category since 2018 are largely weighted toward higher-priority intersections. Figure 1 shows the change in number and percentage of fully compliant intersections, broken out by intersection priority level (1 as highest-priority through 6 as lower-priority).

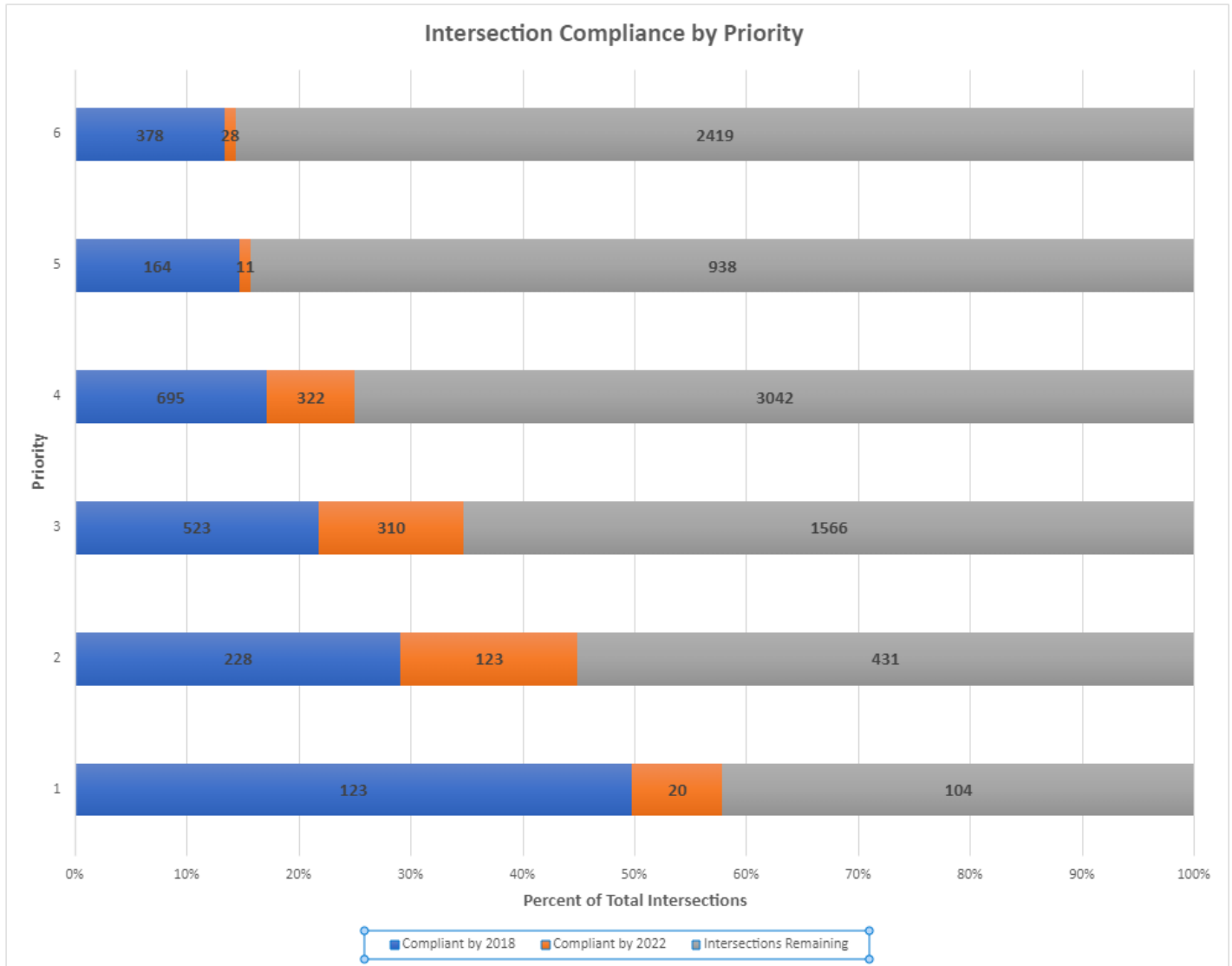


Figure 1 – Bar graph showing intersection compliance by priority

Table 5 shows the change in percent (%) for fully compliant intersections, broken out by intersection priority level (1 as highest-priority through 6 as lower-priority). Note that Table 5 &

Figure 1 are depicting intersections that are “fully compliant.” “Partially compliant” intersections are not captured in this data set and are assumed to be incorporated into the “Intersections

| 2022 | | | | | | |
|-------------------------|--------|--------|--------|--------|--------|--------|
| Row Labels | 1 | 2 | 3 | 4 | 5 | 6 |
| Compliant | 143 | 351 | 833 | 1017 | 175 | 406 |
| Compliant % | 57.89% | 44.88% | 34.71% | 25.05% | 15.72% | 14.37% |
| 2018 | | | | | | |
| Row Labels | 1 | 2 | 3 | 4 | 5 | 6 |
| Compliant | 123 | 228 | 523 | 695 | 164 | 378 |
| Compliant % | 49.80% | 29.16% | 21.79% | 17.12% | 14.73% | 13.38% |
| Improvement 2018 - 2022 | 8.10% | 15.73% | 12.92% | 7.93% | 0.99% | 0.99% |

Remaining” field shown in Figure 1. The % of partially compliant intersections is mostly unchanged from 2018-2022 at around 15% (see Appendices D and E).

Table 5 – Intersection compliance by priority, 2018 vs. 2022

5.2 Program Funding & Timelines to Address Curb Ramp Compliance

DPW addresses non-compliant ramps as part of on-going roadwork and planned alterations. Table 5 shows the commonly used funding sources and programs utilized to build compliant curb ramps throughout the City. The Joint Infrastructure Recovery Roads (JIRR) Program incorporates over \$20M in ADA ramp improvements. The JIRR project array is set to address approximately one-third of non-compliant ramps city-wide. Other DPW programs incorporate less than \$1M for ADA curb ramp improvements over the next five years.

| Program | Funding Source | Locations | Investment | Duration |
|--|---------------------------------------|-----------|--------------|-----------|
| Joint Infrastructure Recovery Roads (JIRR) | FEMA | City-Wide | \$20,000,000 | 2016-2023 |
| Capital Improvement Projects | Bonds | City-Wide | Varies | On-going |
| Federal Programmatic Allocations | Federal Highway Administration (FHWA) | City-Wide | Varies | On-going |
| Federal Grants | Federal Highway Admin/Bonds | City-Wide | Varies | One time |

Table 6 – Programs & Funding for Curb Ramp Construction

The typical cost of addressing a curb ramp for ADA compliance in New Orleans was approximately \$2,500 before 2022 inflation. Construction costs are currently about 50% higher. The cost of constructing ramps in the current climate, taking into account inflation, is approximately \$3,750. All compliance efforts are subject to available funding. As the JIRR program funding is exhausted,

approximately \$61 million will be required to address compliance for the remainder of non-compliant ramps city-wide. Table 6 shows the pace for constructing compliant ramps, as the JIRR program ends after 2023, will be approximately 30-50 intersections per year. See Appendix F for more information on the curb ramp improvement trajectory.

| Average Cost per Ramp (2022 estimate) | Average Cost per Intersection (2022 estimate) | Target Rate for Construction post JIRR (intersections / year) | Average Cost for Target Rate post JIRR (\$/year) |
|---------------------------------------|---|---|--|
| \$3,500 | \$14,000 | 30-50 | \$420,000 - \$700,000 |

Table 7 – Annual Cost Estimates and Projected Rate of Construction

RECOMMENDATIONS

| No. | Category | Description | Milestone/Timeline |
|-----|------------|--|--|
| 5.1 | Curb ramps | Install curb ramps where ramps are missing or non-compliant as intersections are scheduled for improvement | On-going |
| 5.2 | Curb ramps | Determine % curb ramps completed within all Priority Areas | Update annually – starting August 2022 |

5.3 APS upgrades – locations & timelines

Starting in Spring 2022, with the support of Federal Highway Administration (FHWA) funds through the Louisiana Department of Transportation & Development (LaDOTD), APS upgrades are in construction at approximately 48 intersections in the Downtown area owned by CNO or LaDOTD and 16 state-owned intersections across New Orleans. See Appendix I for APS installation locations.

RECOMMENDATIONS

| No. | Category | Description | Milestone/Timeline |
|------|---------------------------------|---|---|
| 3.11 | DPW Policies & Procedures / APS | (RESTATED FROM SECTION 3.3) Formally integrate the APS SOP into the ADA Transition Plan and meet the intended upgrade goals annually | SOP Adopted - 2022 /City-wide APS installation completion-2050 |

5.4 Progress tracking

Key Indicator – Percentage of Intersections whose Curb Ramps are Fully ADA Compliant: We will focus on evaluation of intersections, as opposed to evaluation of individual curb ramps. See Appendix F for more information about curb ramp improvement trajectory. Tracking progress at the intersection level has several advantages:

- The 2018 ADA Transition Plan also focused on intersection-level compliance, so we will be able to make a direct comparison to baseline 2018 compliance.
- Curb ramps are one of the most significant pieces of pedestrian mobility infrastructure at traffic intersections, but they are only one piece of the full picture. By focusing on intersections, we will continue to measure ramp-level ADA compliance but will also include infrastructure like APS signals and accessible parking in future intersection-level ADA compliance evaluations.
- In the long term, our aim is that this intersection-focused approach will incentivize holistic and comprehensive improvements to intersection pedestrian infrastructure.

RECOMMENDATIONS

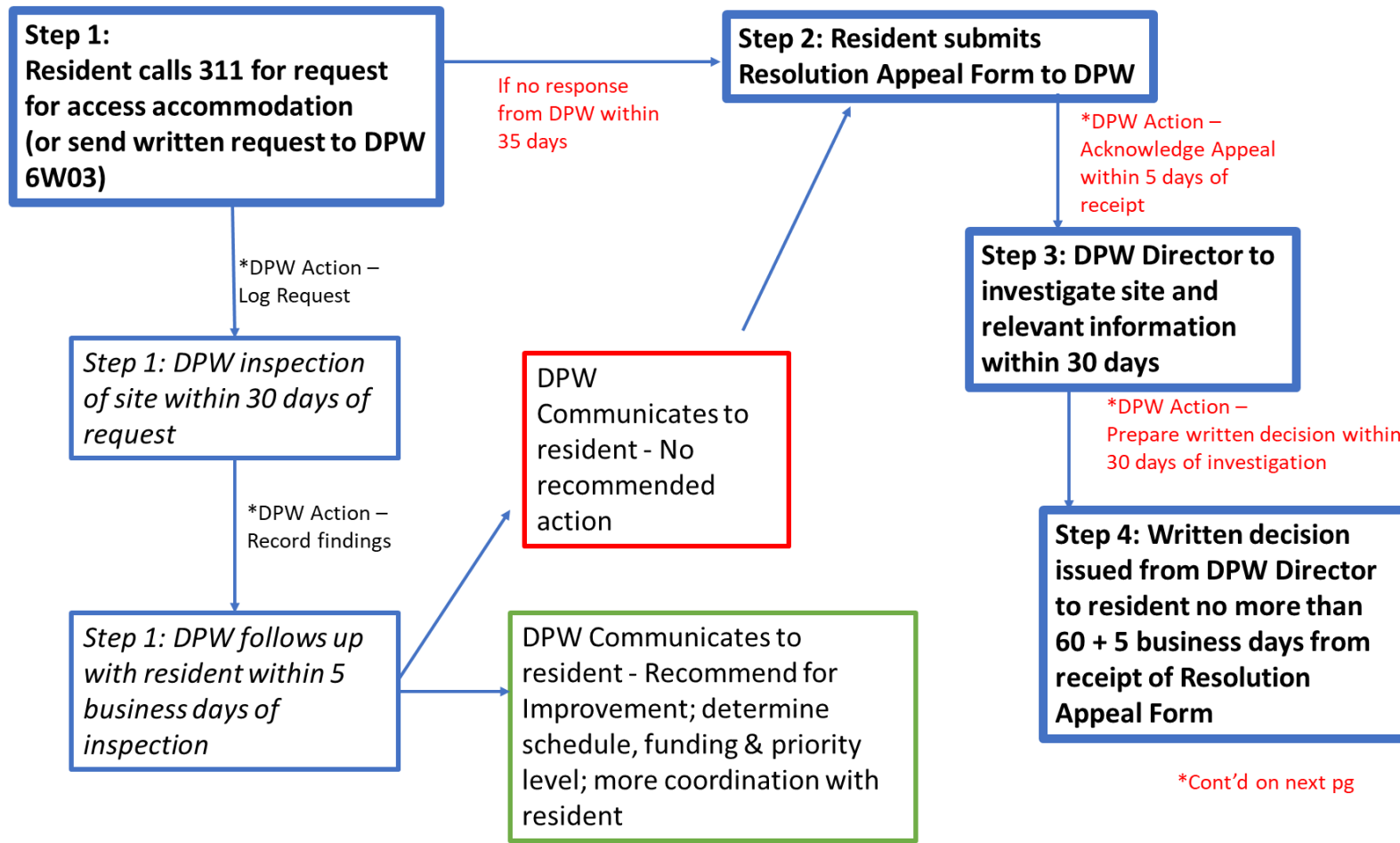
| No. | Category | Description | Milestone/Timeline |
|-----|------------------|--|---|
| 5.3 | Asset Management | Aggregate compliance status to include all facility elements to determine intersection status on the Dashboard | See Recommendation 3.12; Incorporate additional inventories onto Dashboard - 2024 |

Appendix A – CNO ADA Transition Plan for Public Rights of Way, Status of 2013 Recommendations

| Category | 2013 Recommendation | Current Status |
|--|---|---|
| Alterations & Elements added to Existing Facilities | Update DPW permit requirements and utility, property, and sidewalk café franchise agreements to require compliance with R202 of PROWAG | Reviews for permits includes ADA compliance (ADA coordination with DPW, DOJ, Mayor's Office); Guide for sidewalk café compliance under development |
| Pedestrian Street Crossings | 1) Establish a DPW policy for reviewing and granting exceptions for accessible pedestrian crossings; 2) revise DPW standard details to clearly state that DPW requires all pedestrian street crossings be accessible unless an exception is granted | See Recommendation 3.5 |
| Accessible Pedestrian Signals and Pedestrian Pushbuttons | Update DPW specifications to reflect PROWAG technical requirements for new and altered pedestrian signals | APS installation locations shown on ADA Dashboard (2022); see Appendix H – APS Standard Operating Procedure |
| Transit Stops & Transit Shelters | 1) Develop DPW standard details that are compliant with R308 for transit facilities that are commonly constructed in street public rights-of-way; 2) require appropriate specs to ensure compliance on projects that include transit stops and transit shelters | Falls v. RTA Settlement Agreement states that CNO is responsible for all repairs related to the “Access to Stop” issues as defined in the 2015 Survey. The Agreement states that all of the stops are to be brought into compliance by November 30, 2031. |
| On-street Parking Spaces | 1) Develop DPW standards that address accessible on-street parking spaces; 2) ensure that all parking vendor contracts address Section R214 of PROWAG | 2018 Transition Plan Update, Appendix I - established accessible public parking spaces in 10 locations; 2014 policy update - all metered parking is no cost for 3 hours for all vehicles with accessibility hangtags; See Recommendations 3.8 & 3.9 |

Appendix B – Grievance Procedure

The DPW website has been updated to include the grievance procedure and relevant forms for public access. Figure 2 shown on this page and the next page depicts the procedural flow.



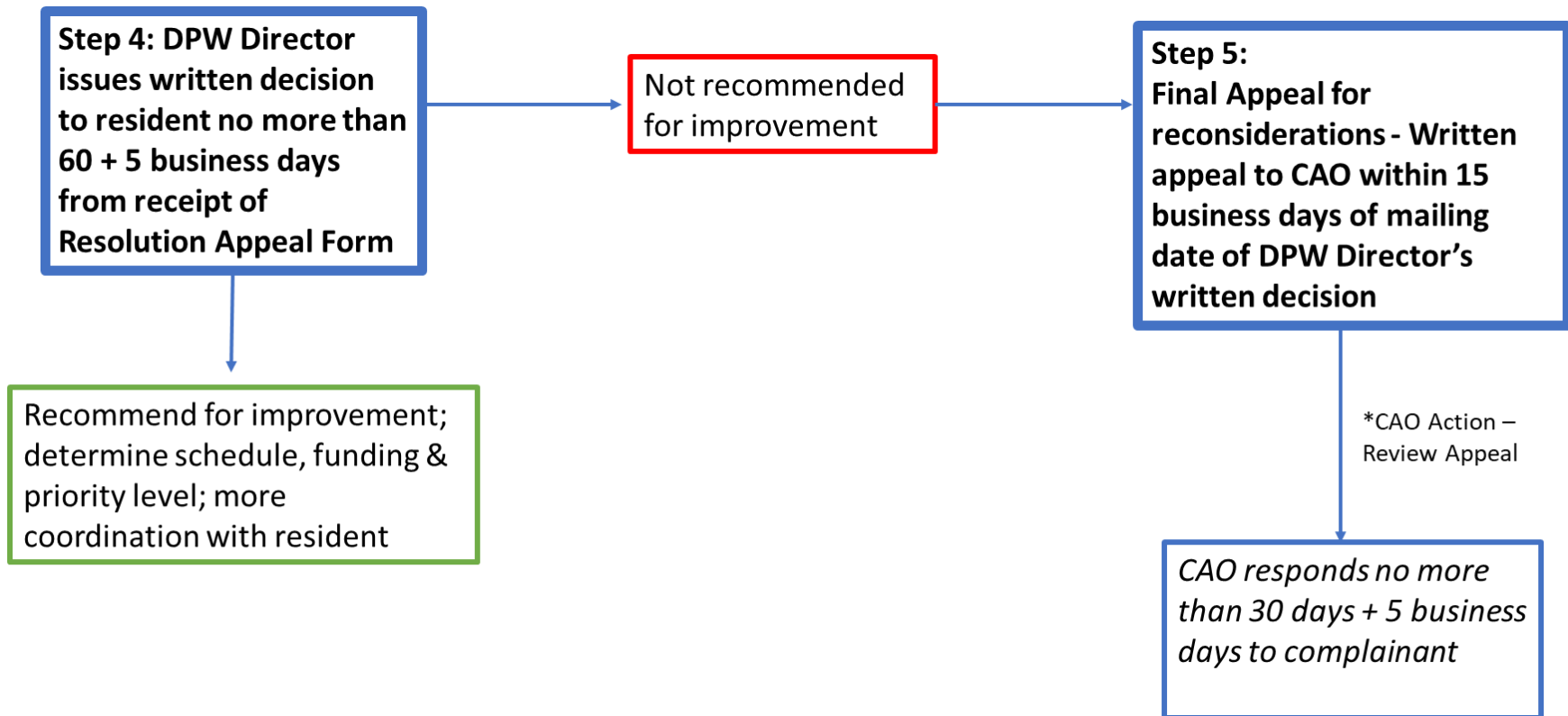


Figure 2 – Grievance Procedure Flow Chart

Appendix C – Transition Plan Update Public Meeting Minutes & Roster

MEETING NOTES

Virtual Meeting for the ADA Transition Plan for Public Rights-of-Way Update

City of New Orleans Dept of Public Works

November 17, 2021; 2:00pm

Attendees

Virginia Brisley, Dept of Public Works (DPW)

Jennifer Ruley, DPW

David Lee Simmons, Roadwork NOLA

Dan Jatres, City of New Orleans

Eva Hurst, City of New Orleans

Chase Miller, City of New Orleans intern

Coco Bendernagel, Children's Hospital

Jeff Rowe, Disability Rights Louisiana

Anne Jayes, Lighthouse Louisiana

David Green, Lighthouse Louisiana

Courtney Jackson, Ride New Orleans

John DeFraitres, DPW

Claudia Garofalo, Advocate

Katherine Hoover

Daniel Smith, City of New Orleans

Following introductions, Virginia presented information about the City's efforts to update the ADA Transition Plan for Public Rights-of-Way. The Plan was last updated in 2018 and documented in Appendix I of the City of New Orleans Americans with Disabilities Act Transition Plan for Public Rights-of-Way.

Further information was shared on the following:

- DPW effort to update and track the ADA plan
- Purpose of the DPW ADA Transition Plan including accountability measures by identifying the Director of DPW as the one to implement the plan
- Background and timeline of the previous DPW efforts around the Transition Plan for Public Rights-of-Way with the initial Plan released in 2013. The subsequent update released in 2018.
- Policy milestones achieved:
 - Updating standard details for ADA compliant pedestrian access for ramps and sidewalks (2015)
 - Update Municipal Code to require evaluating ramps for construction within proximity of the intersection (2015)
- DPW Self-Evaluation for ADA Compliance – status of the initial evaluation from 2013

- Citywide Priority for ADA Improvements - Land use categories were aggregated and weighted to determine Priority 1-6 areas
 - 18 total categories were identified with the intent to analyze where people are trying to get to, and help us prioritize spaces using a heat map of clusters
 - Medical district at that point, the riverside part of Claiborne. At that point in time, UMC and other spaces were not open yet.
 - The example was given of weighting the land use categories - Proximity to NORD and schools
- DPW ADA Advisory Committee advised on land use categories
- Priority Area 1 Inventory and Estimated Costs
 - 400 intersections were surveyed within the priority 1 area to determine the level of effort to bring the ramps into compliance
 - Looked at curbs specifically in those areas and ID'd ones that needed ADA compliance.
- Policy & Ramp Compliance Progress Update
 - The standard drawings for ramp, detectable warnings, and sidewalk compliance are on the DPW website
 - DPW is finalizing policy to install APS whenever traffic signals are modified
 - CNO efforts to remove barriers in pedestrian facilities
 - Data collection and management is in development, Citywide intersection and ramp ID mapping – completed in 2018
 - 39% curb ramps are installed / compliant city-wide as of 2021*
 - 79% curb ramps from Priority 1 area are installed / compliant as of 2021*
 - *... Preliminary results from 2021 mapping effort
 - Major funding sources largely coming from federal allocation, Roadwork NOLA, grants, some bond funding that are being prioritized for Capital Improvements
 - Maps were shown of ramp compliance compared to priority area map – Downtown corridors, Uptown & Lakeview/Gentilly neighborhoods were shown

Discussion followed -

Chase Miller - How do we determine when to go in and recognize growth in some neighborhoods, Bywater/Frenchmen, when do we start to recognize and reassess?

Jennifer – Acknowledges reassessment is to occur but is not clear what the timeframes should be or what parameters to use to recognize shifts in land use. Acknowledges that the priority areas that DPW utilizes going forward needs updating.

How do SBNO and DPW coordinate on sidewalk/curb work?

John DeFraitis is working with SBWBNO on that kind of info sharing

Claudia cannot access the sidewalks in her Maple Street neighborhood

Claudia: Who did you work with who had that lived experience?

Virginia: Have that roster but not right in front of me. Can follow up with you.

Claudia: Impossible to navigate around Touro neighborhood. It's a disaster area – DPW to follow up with Claudia

- Refining the DPW Process
 - Discussion of current accommodation request process
 - Parking
 - Curb ramp
 - Sidewalks

Eva: We need to make it easier to navigate/find on the website

- DPW is reevaluating the grievance process in terms of responding and communications. We haven't yet hammered out the details. Having conversations of having better data, sharing and tracking between the two offices. Eva will be happy to hash that out.

Next Steps

- Will follow up with certain residents on improvements to accessibility
- Reconvene this group in early 2022, provide a more articulated grievance procedure and update the map
- Provide status of the Plan Update in February 2022.

Further discussion -

Policy and Procedures: Eva says it's important to focus on the sidewalk cafes now that parklets may become permanent. Though it has to be ADA accessible, we've doing project with DOJ in doing information accessibility evaluations on the parklet. There's really a lack of knowledge. Violations at just about every business. We're working on a pamphlet.

Anne: There's still great stuff in the first plan that still hadn't been implemented.

Jen: We want to respond to all the recommendations.

Daniel Smith, legal: Map of all the curb ramps and their conditions. Something like the catch basin maintenance.

Jennifer: Would like to do something public facing, but that inventory is based on projects completed or a virtual inspection. Might be an implied uncertainty there. But will work on an update to that for the group.

Claudia: <unknown>

Jen: We work on other sensory stuff and not just curb ramps. Includes signals. If something is unclear and we need to make it clearer, let us know and we'll look into it. We know curb ramps are a limited world in the transition priorities.

Jennifer: Before the next meeting, we run the priority analysis used in 2013 on today's land uses to see the differences to understand how it changes?

Anne: Wants to examine the accountability component to this plan. Complete Streets Coalition does this with their work. Are there other metrics we can build in more accountability and reporting out and create redundancy across efforts to ensure implementation occurs.

Appendix D – Accessibility Dashboard Features

The publicly available Accessibility Dashboard is an interactive map on the DPW website (www.nola.gov/dpw) to show accessibility infrastructure throughout the city. Compliance status of every street intersection within Orleans Parish as of the 2018 inventory, as well as for the 2022 inventory, will be the current measures of ADA compliance for the online mapping tool. If the conditions are not reflected accurately on the map, DPW is actively requesting feedback for on-the-ground conditions such that the map is as accurate as possible. The Introduction tab has information for reporting any issues with the map. Figure 3 is an image from the Accessibility Dashboard site visualizing the curb ramp accessibility status and priority area distribution.



Figure 3– Accessibility Dashboard Interactive Map showing curb ramp accessibility status & priority area distribution

Intersections by ADA Curb Ramp Compliance Status - 2018 Baseline

Click on pie chart elements or legend elements to filter map.

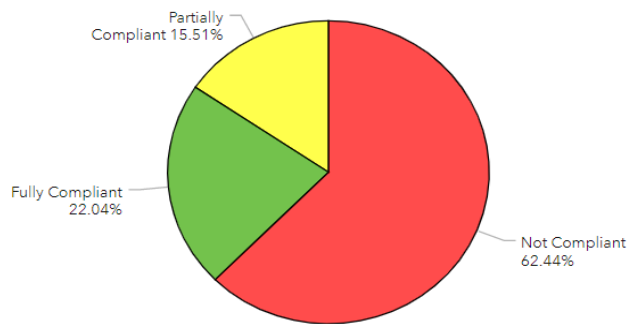


Figure 4 - 2018 Curb Ramp Compliance Pie Chart

The three color-categories - red, yellow, and green - of compliance are summed up by intersection then displayed in a reactive pie-chart. The 2018 compliance distribution pie chart is shown in Figure 4. The ArcGIS Online Dashboard application creation tools will allow for two-way interactivity between the map and the pie chart, for example, mapping and charting compliance neighborhood by neighborhood, or compliance within a custom shape the user draws on the map. As DPW updates 2022 curb ramp compliance data to show current on-the-ground ramp conditions, the baseline data will shift to show more intersections' curb ramps as compliant.

Additionally, the below pie chart shows the number of intersections by priority level (1 through 6) as included in the Accessibility Dashboard and its backing data, as of the 2018 update to the Transition Plan. This pie chart can be viewed on the dashboard by clicking on the "Priority Areas Pie Chart" tab in the bottom right corner of the page.

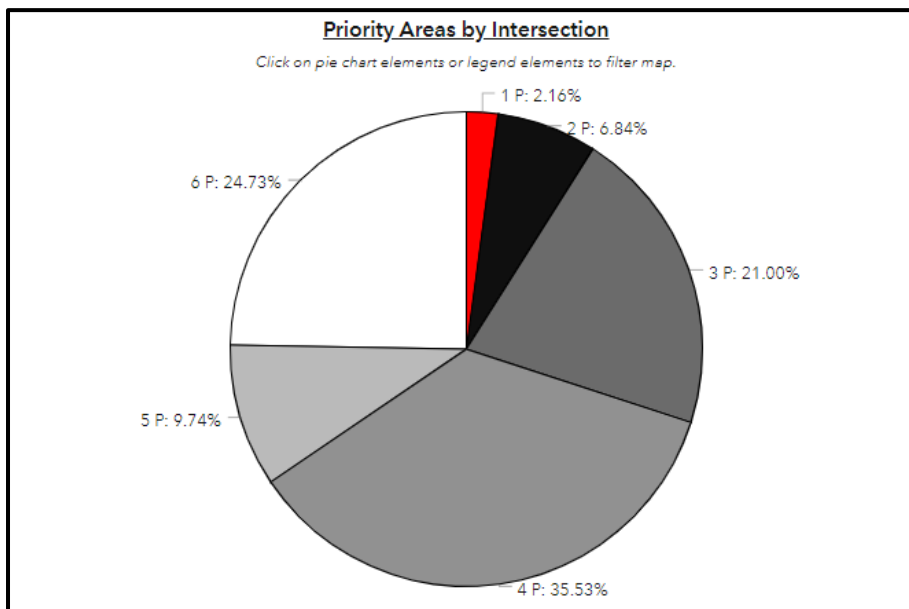


Figure 5 – Accessibility Dashboard Interactive Map Priority Area Distributions

Appendix E – 2022 Status of Curb Ramp Priorities & Compliance

Intersection Curb Ramp Compliance – 2022 Data. The Department of Public Works (DPW) Project Controls Division conducted a review of the as-built curb ramp infrastructure in June 2022, as an update to the 2018 data. Figure 6 shows the pie chart distribution of compliant intersections across New Orleans. As stated section 3.1, the “Partially Compliant” status indicates that some but not all ramps at that intersection are compliant.

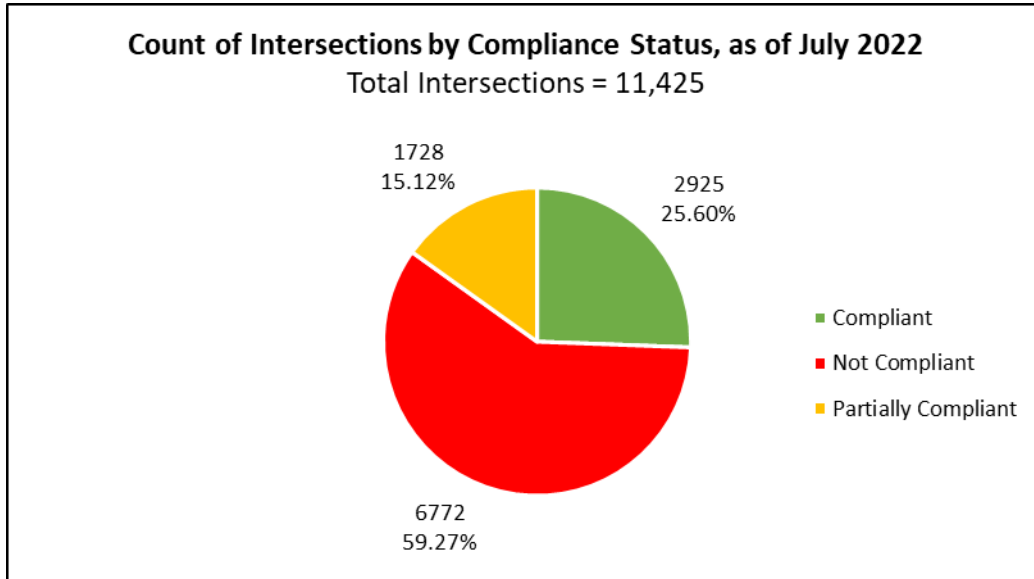


Figure 6 – Accessibility Dashboard pie chart showing intersection accessibility status, 2022

Priority Levels – 2022 Data. In the review of the as-built curb ramp infrastructure in June 2022, to update to the 2018 data, the number of intersections by priority level (1-6) remains largely the same. The updated data for July 2022 are shown in Figure 7. Since the priority levels have not been changed since 2018, the small changes in priority area percentages reflect DPW’s Quality Assurance (QA) and data cleanup.

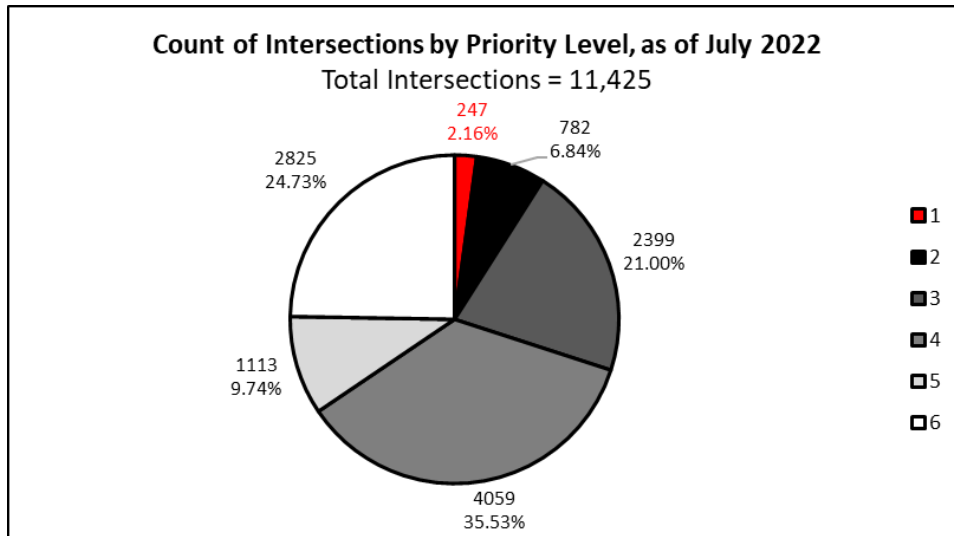


Figure 7 – Accessibility Dashboard Interactive Map showing intersection priorities, 2022

Finally, Figure 8 shows the number of ramps by priority level. This analysis used the above pie chart on intersections by priority level as a starting point. Figure 8 shows the percentages of ramps by priority level (below) are very closely aligned with Figure 7 percentages of intersections by priority level (above).

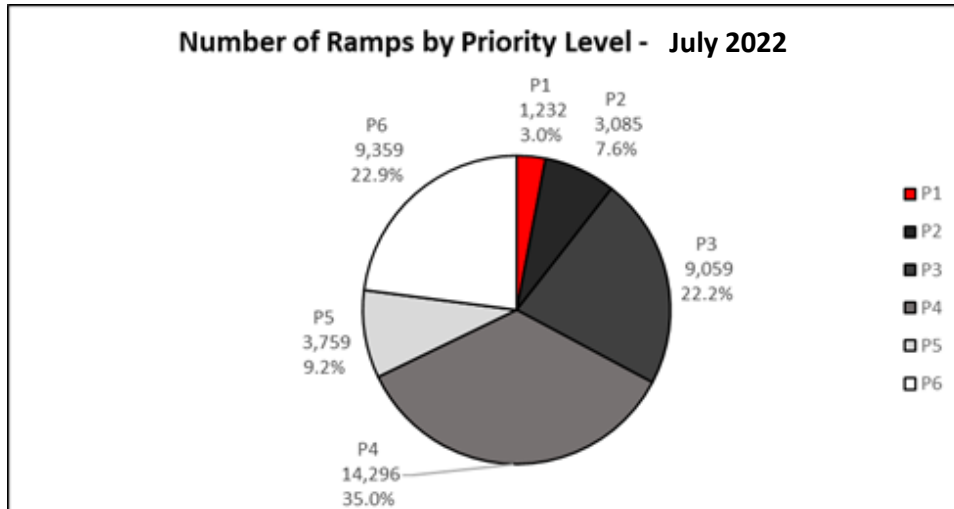


Figure 8 – Accessibility Dashboard Interactive Map showing curb ramp priorities, 2022

Appendix F – Curb Ramp Compliance Trajectory

Using the 2018 curb ramp compliance data as the baseline measurement, and a target of 100% compliance in 2047 cited in the 2013 Transition Plan, we will measure the rate at which intersections are moving into the “Fully Compliant” curb ramp category. We will measure this progress biannually.

Since this is an aggregated metric of ADA compliance, it represents a goal more so than the anticipated year-by-year construction budgets and schedules. These future construction schedules will be used to update the trajectories towards the 2047 targets (for example, a compliance goal with a variable, seasonal rate of construction over time, instead of a simple linear trajectory assuming invariable construction progress). The following programs are in place to address curb ramp compliance:

- **JIRR Program** – DPW is undertaking a FEMA-funded joint infrastructure effort between DPW and Sewerage & Water Board of New Orleans which involves repairing and reconstructing roads and subsurface utilities throughout the city. The Accessibility Dashboard shows JIRR projects in relation to intersections with non-compliant ramps and also shows the JIRR project array is set to address approximately one-third of non-compliant ramps city-wide. FEMA is funding the JIRR thru mid-2023; the City is developing a request to FEMA for additional time to complete remaining work over the next few years.
- **Capital Improvement & Federal Programs/Grants** – DPW is also undertaking roadwork funded by other sources such as bonds, FHWA, and grants. The funding and scope for these projects vary. Over the past five years, DPW initiated projects addressing 200+ intersections where a portion of this work addressed ADA compliance. Assuming a similar pace over the next five years, Other Programs will address approximately 1% of ramps city-wide.
- **Operations Budget** – DPW is also in process of developing multi-purpose contracts for use by the Maintenance Division. These contracts will contain the ability to perform ADA ramp improvements on a limited basis when intersection maintenance is performed as per city code.

Accessible Pedestrian Signals Standard Operating Procedure

New Orleans Department of Public Works

Section 1: Introduction

This Standard Operating Procedure (SOP) is adopted by the City of New Orleans Department of Public Works to establish a consistent and proactive approach to providing Accessible Pedestrian Signals (APS) within the City of New Orleans when an existing traffic signal is modified or a new traffic signal is installed. It's adoption is consistent with previous goals and objectives identified by the City of New Orleans' Americans with Disabilities Act (ADA) Transition Plan, updated in March 2018, and the standards and guidelines established by the Federal Highway Administration's (FHWA) Manual on Uniform Traffic Control Devices (MUTCD) and the US Access Board's proposed Public Rights-of-Way Accessibility Guidelines (PROWAG).

Accessible Pedestrian Signals are devices which communicate information about pedestrian signal timing in a non-visual format such as audible tones, speech messages, and/or vibrating surfaces. These devices primarily assist people who are blind, have low-vision, or are Deafblind, safely cross the street but can provide information that makes signalized crossings easier for all pedestrians.

Section 2: Standard Operation Procedure Statement

Upon the Effective Date of this Standard Operating Procedure, when a new traffic signal is installed or an existing traffic signal is modified within the public right-of-way and the jurisdiction of the City of New Orleans, APS devices shall be provided. Project managers shall ensure all projects meet the requirements of this SOP. The project development and project review process will be modified to ensure that the Traffic Engineering Division and the Safety and Mobility Division review projects at the appropriate development and design stages, including project scoping, to ensure compliance with this SOP and the design standards and guidelines referenced in Section 3.

If the project manager and design engineer cannot provide APS devices due to existing site conditions or cannot otherwise meet the requirements of this Standard Operating Procedure, they must document and provide justification for all deviations from the requirements. This documentation must be reviewed and approved by the Chief Traffic Engineer. If the Chief Traffic Engineer is serving as the project manager, then documentation must be reviewed and approved by the Deputy Director of Operations or successor position.

When a new traffic signal is installed or an existing traffic signal is modified within the New Orleans public right-of-way, but not within the jurisdiction of the City of New Orleans (for example the Louisiana Department of Transportation and Development), the City of New Orleans will request that said entity provide APS devices per this Standard Operating Procedure in order to provide consistent expectations for users.

Section 3: Design Standards and Guidelines

All APS devices provided shall conform to the requirements of the 2009 Edition of the MUTCD, Section 4E and the guidelines of the Public Rights-of-Way Accessibility Guidelines, Section R209. Additionally, the Department of Public Works will update its signal specifications to conform with the above and establish other standards and guidance necessary for successful implementation in the City of New Orleans.

Such guidelines and standards shall apply to topics including, but not limited to the location of APS devices, the walk indications, the tactile arrows, the locator tones, and the pushbutton features.

Section 4: Prioritization

The Department of Public Works will utilize a prioritization tool to identify and prioritize existing traffic signal locations to retrofit with APS devices. Retrofit candidates include traffic signals with existing non-APS pedestrian signals, traffic signals without pedestrian signals, and traffic signals on state routes. Proactive retrofits will be in addition to retrofits triggered by other projects that modify existing traffic signals. This prioritization shall utilize the tool outlined in NCHRP 150: Accessible Pedestrian Signals: A Guide to Best Practices, Appendix D and the Land Use Priorities identified in the New Orleans ADA Transition Plan, Table 1.

Following adoption of this Standard Operating Procedure, the Department of Public Works will conduct an inventory of existing signalized intersections and collect information as needed to complete the prioritization tool for all signalized intersections within 12 months. This prioritization will include all signals within the public rights-of-way in New Orleans, regardless of jurisdiction. To ensure accurate representation of conditions, the prioritization will be repeated every three (3) years for signalized intersections that do not have APS devices present or funding allocated to provide APS devices.

The prioritized list of signalized intersections and the list of intersections with existing and funded APS devices will be available publicly through the City's Open Data Portal.

Section 5: Public Engagement

Public input regarding requests for APS devices at signalized intersections are factored into the prioritization tool identified above. This input may be obtained through a number of channels, including: requests submitted to the Department of Public Works through the City's 311 system; requests submitted to the City's ADA Coordinator or the Mayor's Advisory Council for Persons with Disabilities; requests submitted to the Office of Human Rights and Equity.

Section 6: Goals

Upon completion of the initial prioritization, the City of New Orleans will provide APS devices at a minimum of twelve (12) signalized intersections within the City's jurisdiction annually. The City will also work with partner entities to support their deployment of APS at signalized intersections within the public right-of-way, but outside of the City's jurisdiction. This goal will be reevaluated every three (3) years following the updated prioritization process described in Section 4. The Department of Public Works will include progress on APS deployment in the annual Complete Streets report and on the public facing Department dashboard.

Appendix I – 2022 APS Installation Locations

The following locations are under construction for APS installations in 2022 as part of two state funded projects in New Orleans with a completion date set for July 2023.

State Project H.012682 – 48 intersections (city & state owned)

| Cross Street 1 | Cross Street 2 |
|----------------------------|-------------------------------|
| Tulane Ave | LaSalle St |
| O'keefe Ave | Gravier St |
| O'keefe Ave | Perdido St |
| O'keefe Ave | Girod St |
| O'keefe Ave | Julia St |
| O'keefe Ave | Howard Ave |
| Baronne St | Girod St |
| Baronne St | Julia St |
| Baronne St | Howard Ave |
| Loyola Ave | Julia St |
| Carondelet St | Girod St |
| Carondelet St | Julia St |
| Carondelet St | St Joseph St |
| Carondelet St | Howard Ave |
| St Charles Ave | Girod St |
| St Charles Ave | Julia St |
| St Charles Ave | St Joseph St |
| St Charles Ave (downbound) | Egalite (formerly Lee) Circle |
| Howard Ave | Egalite (formerly Lee) Circle |
| Camp St | Girod St |
| Camp St | Julia St |
| Camp St | St Joseph St |
| Camp St | Andrew Higgins Blvd |
| Magazine St | Girod St |
| Magazine St | Julia St |
| Magazine St | St Joseph St |
| Magazine St | US90/Calliope (LB& RB) |
| Camp St | US90/Calliope (LB& RB) |
| Baronne St | US90/Calliope (LB& RB) |
| Simon Bolivar Ave | US90/Calliope (LB& RB) |
| St Charles Ave | US90/Calliope (LB& RB) |
| Tchoupitoulas | US90/Calliope (LB& RB) |
| Tchoupitoulas | Julia St |
| Camp St | Common St |
| Camp St | Gravier St |
| Basin St | St Louis St |

| Cross Street 1 (cont'd) | Cross Street 2 (cont'd) |
|--------------------------------|--------------------------------|
| Basin St | Crozat St |
| Tulane Ave | S Claiborne Ave |
| Poydras | S Claiborne Ave |
| Cleveland Ave | S Claiborne Ave |
| Esplanade Ave | Decatur St |
| Esplanade Ave | Royal St |
| St Charles Ave (upbound) | Egalite (Lee) Circle |
| Camp St | Lafayette St |
| N Peters St | Ursulines Ave |
| N Peters St | Barracks St |
| N Peters St | Esplanade Ave |
| Magazine St | Poeyfarre St |

State Project H.013391 – 16 intersections (state owned)

| Cross Street 1 | Cross Street 2 |
|--------------------------|------------------------|
| US 61 (Arline Hwy) | South Carrollton Ave |
| US 90 (S Claiborne Ave) | Louisiana Ave |
| US 90 (Chef Menteur Hwy) | Providence Place |
| US 90 (Chef Menteur Hwy) | Press Dr |
| Oretha Castle Haley Blvd | Calliope St |
| US 90 | Tchoupitoulas St |
| US 90 | Annunciation St |
| US 90 Bus (RB Frontage) | Annunciation St |
| I-10 N Service Rd | Bullard Ave |
| US 90 | Earhart Blvd |
| US 90 (S Claiborne Ave) | Nashville Ave |
| US 90 (S Claiborne Ave) | Jefferson Ave |
| LA 39 (N Claiborne Ave) | St Bernard Ave |
| I-610 | Elysian Fields Ave |
| I-10 (S Service Rd) | Read Blvd |
| US 90 Bus (RB Frontage) | Convention Center Blvd |