



Libertyville



Village of Libertyville

Americans with Disabilities Act (ADA) Self-Evaluation and Transition Plan

TECHNICAL REPORT

February 2026

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The Village of Libertyville has prepared this transition plan with the assistance of the consultant team led by Kimley-Horn and Associates, Inc. The Consultant Team, the ADA/504 Coordinator, the Chicago Metropolitan Agency for Planning, and the contributing departments of the Village of Libertyville 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 had been narrowed by U.S. Supreme Court decisions.

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 apply 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 Plan

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.

DOJ – United States Department of Justice

Under the leadership of the Attorney General of the United States, the Justice Department comprises more than 40 component organizations and more than 115,000 employees. Headquartered in the Robert F. Kennedy Building in Washington, D.C., the Department maintains field offices in all states and territories across the United States and in more than 50 countries worldwide. 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 ensures that America's roads and highways remain among the safest and most technologically advanced in the world.

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 address shared-use paths, which are designed primarily for bicyclists and pedestrians for transportation and recreation.

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 to ensure that individuals with physical disabilities 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.



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 Village of Libertyville to update its ADA Transition Plan over time. The prioritization methodology for evaluating and implementing improvements was developed based on the applicable ADA Standards and the Public Rights-of-Way Accessibility Guidelines (PROWAG), as well as various demographic factors. Details are provided in this document.

This document provides an overview of the ADA and offers possible solutions for the Village of Libertyville, 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 public programs, services, and activities (PSAs), including pedestrian facilities, provide equal access for individuals with disabilities.

The Village of Libertyville 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 Village of Libertyville 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 Village 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 Village of Libertyville 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 grievance 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 until all barriers have been addressed.

This document describes the process developed to complete the evaluation of the Village of Libertyville's PSAs and facilities, provides possible solutions to remove programmatic barriers, and presents a Transition Plan for the modification of facilities with the public rights-of-way to improve accessibility, which will guide the planning and implementation of necessary program and facility modifications for subsequent projects over the next several years. The ADA Self-Evaluation and Transition Plan is significant because it establishes the Village's ongoing commitment to developing and maintaining 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, advertising, orientation, eligibility, participation, testing or evaluation, the provision of auxiliary aids, transportation, policies, and communication.

1.4.1 ONGOING ACCESSIBILITY IMPROVEMENTS

Village 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 reflect modifications completed or to be completed from the initial Self-Evaluation. This Plan will be posted on the Village's website for public review and consideration.

1.4.2 VILLAGE OF LIBERTYVILLE APPROACH

This ADA Transition Plan has been prepared after careful study of all pedestrian facilities in the public rights-of-way. The purpose of this plan is to provide the framework for achieving equal access throughout the Village of Libertyville within a reasonable timeframe. The Village believes that accommodating people with disabilities is essential to good customer service, helps ensure the quality-of-life residents seek to enjoy, and guides future improvements.

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



service, or activity. The Village of Libertyville will not place surcharges on individuals with disabilities to cover the costs of 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 result in a fundamental alteration in the nature of a service, program, or activity, or in 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. If the Village determines that a proposed action would impose an undue financial or administrative burden, create hazardous conditions for others, or threaten or destroy the historic significance of a historic property, the municipality is responsible for communicating and documenting 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 Village.

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 to meet compliance requirements, a public entity shall prioritize those that offer services, programs, and activities to qualified individuals with disabilities in the most appropriate integrated setting.

HISTORIC SIGNIFICANCE

In determining whether an alteration would threaten or destroy the historic significance of a historic property, the Village should first confirm if the property is a qualified historic building or facility, which is defined by the ADA 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 are several registered historical places within the Village, including the downtown core, which was added to the National Register of Historic Places in the spring of 2025. In addition to properties in this district, there may be other documentation available that is not provided on these websites for properties on the National Register.

- ▶ [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 with respect to the number of its employees; the number, type, and location of its facilities; and
4. The type of operation or operations of the covered entity, including the composition, structure, and functions of the workforce of such entity; the geographic separateness, 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 actually 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

Under the ADA Title II Regulations, if the construction start date 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 construction begins 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 in developing accessibility guidelines and standards. On July 26, 1991, the U.S. Access Board published the original Americans with Disabilities Act Accessibility Guidelines (ADAAG), which the DOJ also adopted as standards that same day. Between 1994 and 2002, the U.S. Access Board updated the 1991 ADAAG to include supplements addressing 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 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 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. Additionally, the Illinois Department of Transportation (IDOT) has adopted PROWAG and incorporated the guidelines into design standards for pedestrian facilities.

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 the 2010 ADA Standards, the enforceable accessibility 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 Architectural Barriers Act (ABA) that address access to sidewalks and streets, crosswalks, curb ramps, pedestrian signals, on-street parking, and other components of public rights-of-way. These guidelines also address shared-use paths, which are designed primarily for bicyclists and pedestrians for transportation and recreation. 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 represents the state of the practice 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), which serves as the DOT's regulatory standard 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 determine how to ensure there is no "conflict" between PROWAG and the 11th Edition of the Manual on Uniform Traffic Control Devices for Streets and Highways (MUTCD).



Until DOJ adopts 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 usable by” individuals with disabilities). Public entities are not required to adopt the Final PROWAG at this time, but may consult other guidance resources (e.g., the Final PROWAG, DOJ’s 2010 ADA Standards for buildings and sites, and other accessibility resources). However, it is recommended that the Village of Libertyville adopt PROWAG to make it an enforceable document for all Village 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 MUTCD is published by the FHWA under 23 CFR, Part 655, Subpart F, and 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 for local agencies to plan, design, construct, and maintain local roads and streets. Its primary purpose is to ensure consistency in local transportation projects. The Bureau routinely updates the manual as laws, policies, procedures, or design criteria change.



1.6 EXISTING VILLAGE PROGRAMS THAT IMPLEMENT ADA UPGRADES

The Village of Libertyville currently implements ADA-compliant designs through the following efforts:

- ▶ The Village’s annual Road Rehabilitation, Mud Jacking, and Sidewalk Replacement Programs include select curb and gutter and sidewalk replacement, and pavement resurfacing, which improve the pedestrian path of travel in the public rights-of-way and help maintain accessible routes within the Village.
- ▶ The Village’s Public Works Department services include pothole repairs that eliminate disruptions in the roadway surface. Additional services include the preparation and repair of paved surfaces, as required throughout the Village, including where they intersect the pedestrian path of travel.
- ▶ Annual Village Capital Improvement Projects already allocate about \$280,000 each year to address ADA-related items. This approximate amount will likely change over time, subject to the Village’s annual budget process.
- ▶ All Village projects conform to the Village design standards, which require compliance with PROWAG.
- ▶ The Village seeks out alternate funding mechanisms, when applicable, to fund improvements.



2.0 PUBLIC OUTREACH

Gathering public feedback was a vital step in developing the Village of Libertyville 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 CMAP, a Communications and Outreach Strategy was created to help organize 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 Village's draft ADA Transition Plan. The following sections detail the outreach efforts conducted during the plan's development.



2.1 ENGAGE WITH CMAP PROJECT WEBPAGE

Through collaboration with CMAP, a project webpage was developed dedicated to the Village of Libertyville's 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.

Throughout the project, the Village 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 developed is shown in **Figure 1** below.

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

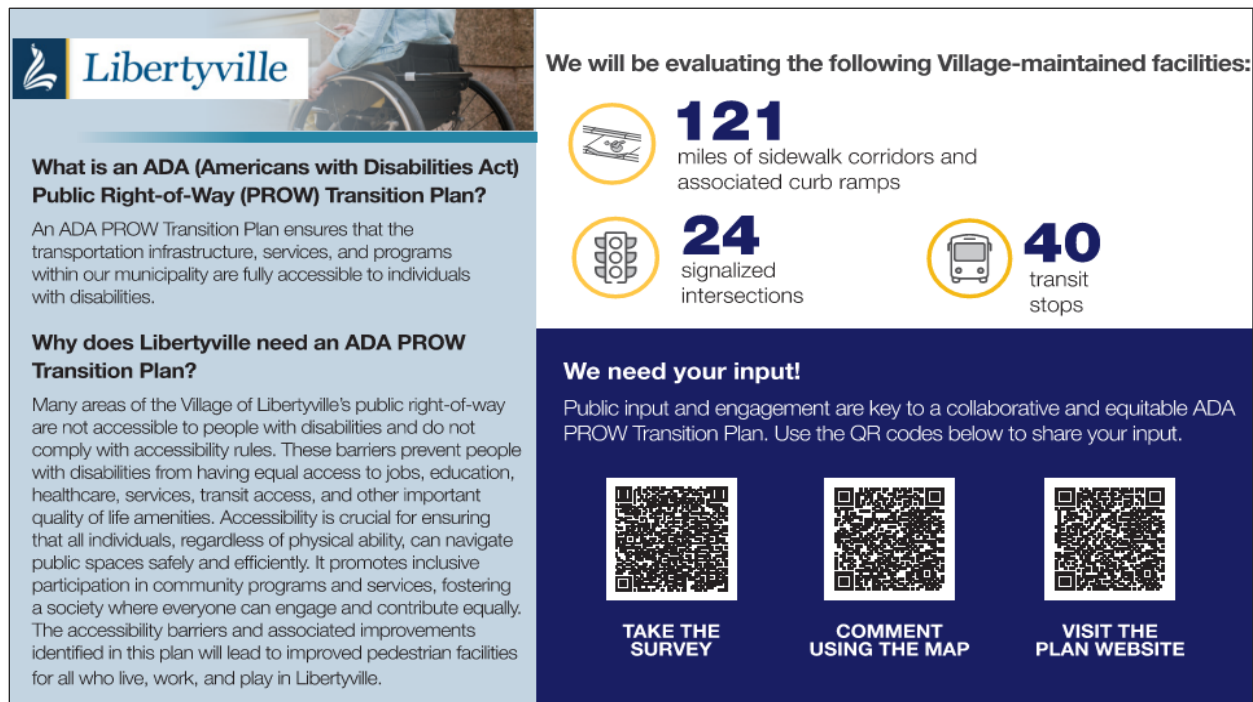
The survey generated a total of 48 responses:

- ▶ Around 60% responded positively when asked about barriers in Public Rights-of-Way
- ▶ Around 83% responded positively when asked about programmatic barriers
- ▶ Around 75% of respondents believe the Village is accommodating of persons with disabilities
- ▶ Around 73% of respondents obtain available information from the Village website and social media

Of those 48 responses:

- ▶ 33 were residents of the Village of Libertyville
- ▶ 5 live in the area but outside the Village's limits
- ▶ 2 stated that neither option described them
- ▶ 8 declined to respond to the question

FIGURE 1. VILLAGE OF LIBERTYVILLE PUBLIC RIGHTS-OF-WAY ADA TRANSITION PLAN FLYER



Libertyville

What is an ADA (Americans with Disabilities Act) Public Right-of-Way (PROW) Transition Plan?

An ADA PROW Transition Plan ensures that the transportation infrastructure, services, and programs within our municipality are fully accessible to individuals with disabilities.

Why does Libertyville need an ADA PROW Transition Plan?

Many areas of the Village of Libertyville's public right-of-way are not accessible to people with disabilities and do not comply with accessibility rules. These barriers prevent people with disabilities from having equal access to jobs, education, healthcare, services, transit access, and other important quality of life amenities. Accessibility is crucial for ensuring that all individuals, regardless of physical ability, can navigate public spaces safely and efficiently. It promotes inclusive participation in community programs and services, fostering a society where everyone can engage and contribute equally. The accessibility barriers and associated improvements identified in this plan will lead to improved pedestrian facilities for all who live, work, and play in Libertyville.

We will be evaluating the following Village-maintained facilities:

- 121** miles of sidewalk corridors and associated curb ramps
- 24** signalized intersections
- 40** transit stops

We need your input!

Public input and engagement are key to a collaborative and equitable ADA PROW Transition Plan. Use the QR codes below to share your input.

- TAKE THE SURVEY**
- COMMENT USING THE MAP**
- VISIT THE PLAN WEBSITE**

The online interactive map garnered 22 responses. The feedback identified several locations where curb ramps are missing, areas of particularly dangerous sidewalks and crosswalks, and some obstructions at transit stops.

A summary of the survey and online map responses 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 provided project direction, reviewed key deliverables, and assisted with public outreach efforts. Village staff, CMAP, 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 public outreach events, review project deliverables, and discuss the state of accessibility in Libertyville.

- ▶ May 28, 2025
- ▶ July 24, 2025
- ▶ September 19, 2025
- ▶ February 25, 2026

The Committee comprised representatives of key organizations that directly engage with the 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 four (4) in-person interviews with members of the Steering Committee, Village staff, and interested members of the public. The interviews took place in September and provided insight into the current conditions and residents' vision for the community. Overall, the interviewees were pleased with the Village's efforts to improve accessibility and expressed enthusiasm for the additional investments in public infrastructure. Some of those interviewed stated that the Village's efforts to upgrade existing crosswalks with audible speech components and to increase accessibility at public parks were greatly appreciated, and they looked forward to seeing more of those improvements implemented throughout the community. Additionally, a few specifically praised the Village Public Works Department for its responsiveness in addressing issues raised. Others envision this project as a catalyst for ongoing discussions and improvements within the Village.

Several areas were listed for consideration of improvements due to accessibility challenges, including:

- ▶ Along Milwaukee Avenue (which is an IDOT roadway), particularly for the use of traveling between the east and west sides of the Village.
- ▶ The crossing between Adler Park and the Fire Station #1
- ▶ The southeast corner of Brainerd Avenue and Jackson Avenue
- ▶ The pedestrian path along the Rockland Road bridge east of Riverside Drive
- ▶ The sidewalk directly outside of the Senior Center, particularly the transition to the ramp leading into the building,
- ▶ Sudden termination of pedestrian facilities at areas where the State or County assumes maintenance instead of the Village.



2.4 PUBLIC ENGAGEMENT EVENTS

The Village hosted three (3) public engagement events to receive feedback from project stakeholders and the public.

The first two events were hosted at the Farmer's Market on July 3, 2025, and August 28, 2025. Attendees were given flyers with QR codes and an overview of the project. Everyone was encouraged to visit the project webpage and complete the survey and the interactive map. Materials at the events included laptops and tablets to help access the project webpage, physical copies of the survey, an accessibility board game, and an interactive map board exhibit with stickers. **Figure 2** shows the booth with the interactive map exhibit. **Figure 3** shows the accessibility board game.

At the farmers market events, several residents expressed appreciation for the Village's work on the ADA Transition Plan. Several residents also noted significant improvements in their neighborhoods following recent curb ramp repairs.

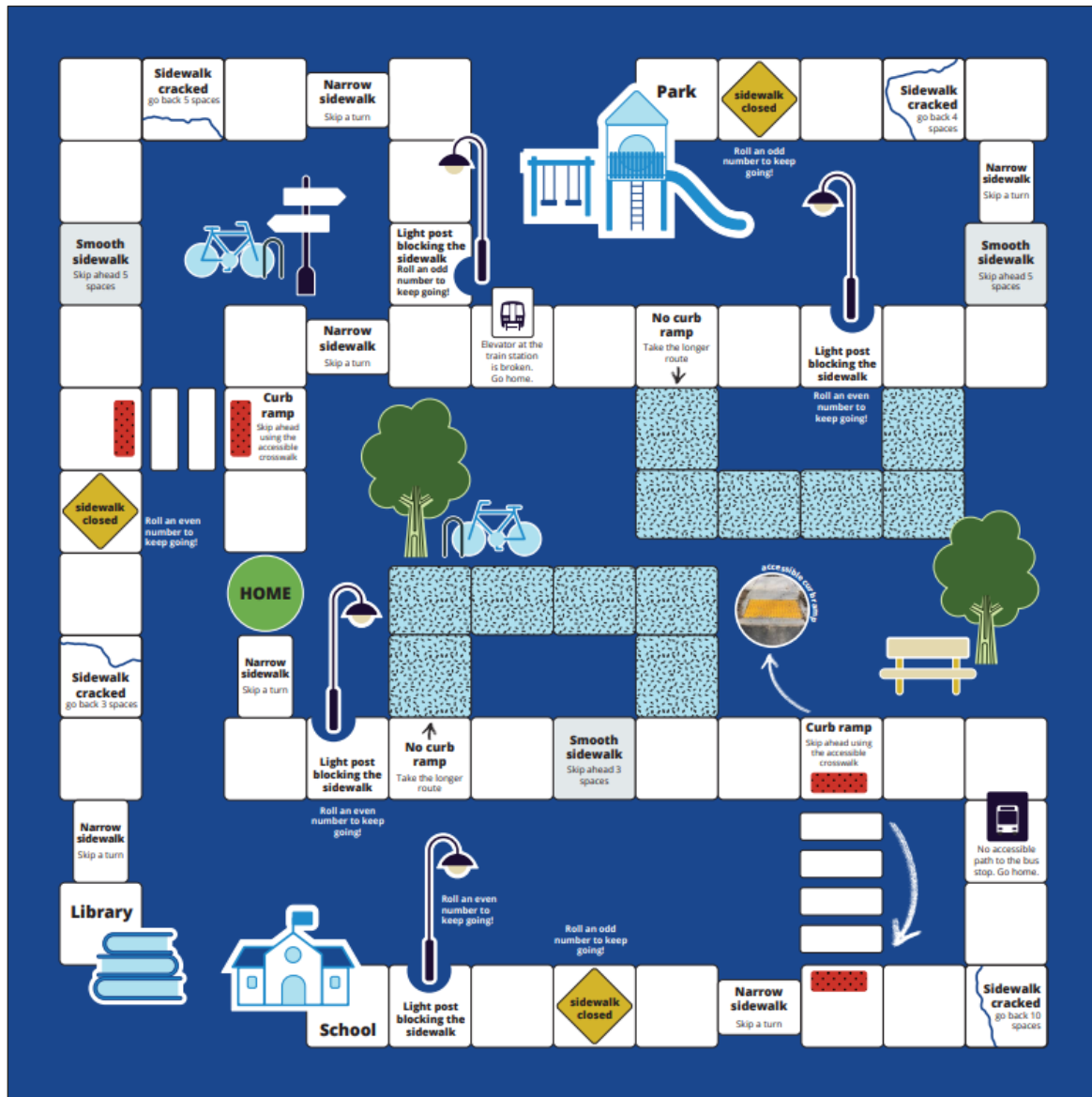


FIGURE 2. FARMERS MARKET EVENT





FIGURE 3. ACCESSIBILITY BOARD GAME



The third event was held on September 10, 2025, at the Libertyville Senior Center. The goal was to target a different demographic than those who attended the Farmer's Market events. The Consultant team provided the project's background and goals. Several attendees grabbed the flyers and completed the online survey.

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



3.0 SELF-EVALUATION AND SUMMARY OF OBSERVATIONS

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



3.1 SERVICES, POLICIES, AND PRACTICES REVIEW

Under the ADA, the Village of Libertyville is required to complete a Self-Evaluation of the Village'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 proposes solutions for services, policies, and practices that are inconsistent with Title II requirements. To be compliant, the Self-Evaluation should consider all the Village's programs, services, and activities, as well as the policies and practices the Village uses to implement its various programs, services, and activities.

To comply with the requirements of the ADA, the Village must take corrective measures to achieve program accessibility through several methods, including, but not limited to:

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

When choosing a method for providing program access, the Village should prioritize the option that promotes inclusion for all users, including individuals with disabilities.

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

However, the Village does not have to take any action that would result in a fundamental alteration in the nature of a program or activity, create a hazardous condition for others, or impose an undue financial or administrative burden. This determination should generally be made by the ADA/504 Coordinator and/or an authorized designee of the Village, such as the Village Mayor or their designee, and 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 available resources. If a barrier-removal action is deemed unduly burdensome, the Village must consider all other options for providing access to 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 Village able to assist with questions and concerns regarding disability discrimination.

The Village of Libertyville has assigned Ashley Engelmann as ADA/504 Coordinator for Title II. Below is the ADA/504 Coordinator's contact information.

Deputy Village Administrator, ADA/504 Coordinator
118 W Cook Avenue
Libertyville, IL 60048
Office: 847-362-2430
Relay: 7-1-1
vol@libertyville.com

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

- ▶ Post on the Village website;
- ▶ Prominently display in common areas that are accessible to all employees and areas open to the public;
- ▶ Provide in materials that are distributed by the Village for meetings and events where requests for auxiliary aids or services for effective communication might be needed; and
- ▶ Provide in materials that are distributed by the Village 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 are recommended by the U.S. Department of Justice:

- ▶ 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 Village's efforts to comply with Title II and investigating any complaints related to potential Title II violations. The role of the ADA Coordinator typically includes serving as the primary contact when members of the public request an auxiliary aid or service to ensure 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 promptly and fairly resolving grievances 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 Village of Libertyville's ADA grievance policies and procedures were updated in April 2025. The Title II ADA Grievance Policy, Procedure, and Form can be found in **Appendix B** and are also available on the Village's website here: [Click here for the Village of Libertyville's 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 must include information about Title II of the ADA and how it applies to the public entity's programs, services, and activities. 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 as needed.

The Village of Libertyville's ADA Public Notice can be accessed in **Appendix B** and is also posted on the Village's website here: [Click here for the Village of Libertyville's Public Notice Under the ADA.](#)

3.1.5 ADA LIAISON TEAM

The Village of Libertyville has established an ADA Liaison Team composed of representatives from various Village 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 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, the ADA Liaison Team information can be posted in common areas accessible to employees and in public areas. This includes posting this information on the Village website.

3.1.6 VILLAGE ORDINANCE REVIEW

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

- ▶ **Sec 21-3** – The Village does not allow residents to remove or push snow from private properties onto public right-of-way, including public roadways and sidewalks.
- ▶ **Sec 21-4** – The owners, tenants, and occupants adjoining public sidewalks are responsible for maintenance of vegetation to ensure that the sidewalk is clear of obstructions and encroachments.

3.1.7 SNOW REMOVAL

The Village of Libertyville understands that snow can create mobility challenges for all pedestrians, including when it blocks the sidewalk. To maintain access to the most used Village facilities, the Village performs snow and ice removal in the central business district. [Click here for a map of the central business district snow removal limits.](#)



3.2 FACILITIES REVIEW

All existing pedestrian facilities within the Village of Libertyville were evaluated for compliance with applicable ADA standards and guidelines. Pedestrian facilities are located along the Village of Libertyville, Illinois Department of Transportation (IDOT), and Lake County roads.

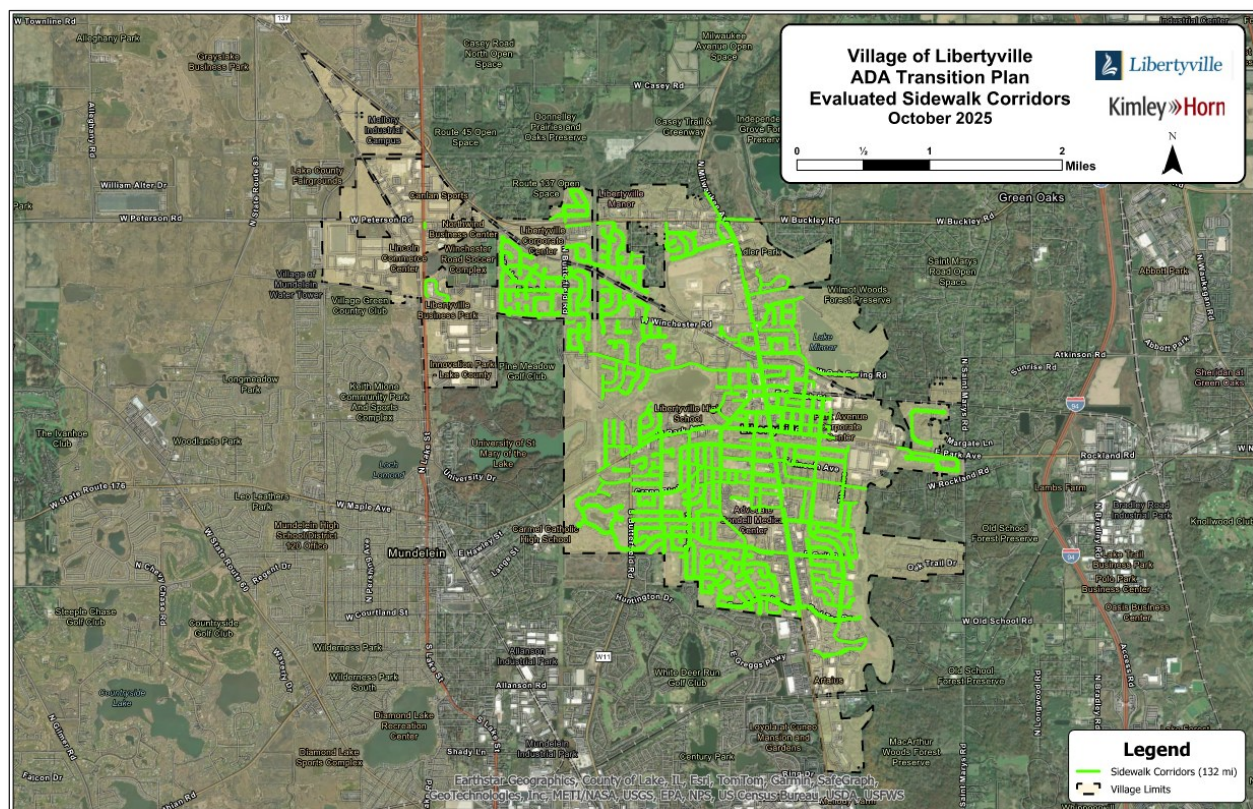
The Village is responsible for the maintenance of all sidewalk facilities along all roads within the Village, as well as all curb ramps, pedestrian street crossings, and driveway crossings at non-IDOT/County unsignalized intersections. The results of these evaluations are summarized in this report.

The Village is not responsible for the maintenance of curb ramps, pedestrian street crossings, and signalized intersections at Lake County or IDOT roadways. Similarly, the Village is not responsible for transit stops maintained by Pace Suburban Bus. The results and associated data from the evaluations of all IDOT, Lake County, and Pace Suburban Bus facilities are summarized in a separate document that CMAP will provide to each agency.

3.2.1 SIDEWALK CORRIDORS

The sidewalk corridor evaluations documented conditions and measurements along the pedestrian path of travel within the Village right-of-way, including the sidewalk, pedestrian street crossings, driveway crossings, and curb ramps. Approximately 132 miles of sidewalk corridors were evaluated. A map of the evaluated sidewalk corridors is shown below (see **Figure 4**) and provided in **Appendix C**. The Village is responsible for maintaining the sidewalk along IDOT roadways, while IDOT is responsible for the curb ramps and pedestrian street crossings along those roadways. A summary of the evaluation observations and compliance status for all curb ramps and pedestrian street crossings along IDOT- and Lake County-maintained roadways is provided in a separate document.

FIGURE 4. EVALUATED SIDEWALK CORRIDORS



SIDEWALK CORRIDORS: SELF-EVALUATION OBSERVATIONS

The evaluated sidewalks were scored on a scale from zero (0) to five (5), with 0 being the least compliant. 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 or evidence of standing water
- ▶ Presence of any overgrown vegetation, such as tree limbs overhanging the sidewalk



Sidewalk scores for the entire Village network are summarized in **Section 3.3**. More detailed scoring information and locations are available in the detailed sidewalk reports.

Common issues along the sidewalk corridors included:

- ▶ Excessive cross slopes – Slopes more than 2.1% perpendicular to the intended path of travel (see **Figure 5**)
- ▶ Tripping Hazards – Any vertical discontinuity along the pedestrian path of travel greater than 0.25 inches (see **Figure 6**)
- ▶ 509 permanent obstructions in the sidewalk, such as power poles or utilities (see **Figure 7**)
- ▶ 646 temporary obstructions in the pedestrian circulation path, such as weeds and low-hanging branches. (see **Figure 8**)

FIGURE 5. EXAMPLE OF SIDEWALK WITH SEVERE CROSS SLOPE





FIGURE 6. EXAMPLE OF SIDEWALK WITH TRIPPING HAZARD



FIGURE 7. EXAMPLE OF SIDEWALK WITH PERMANENT OBSTRUCTION





FIGURE 8. EXAMPLE OF SIDEWALK WITH TEMPORARY VEGETATION OBSTRUCTION



UNSIGNALIZED INTERSECTIONS: SELF-EVALUATION OBSERVATIONS

Common observations of curb ramps at unsignalized intersections and driveways along sidewalk corridors included excessive running and cross slopes at landings, lack of color or texture contrast (detectable warning surfaces), and limited curb ramp widths. A summary of observations at unsignalized intersections and driveway curb ramps is provided in **Table 2**.

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 walks cross curbs, giving priority to walkways serving entities covered by the ADA, including state and local government offices and facilities, transportation, places of public accommodation, and employers, followed by walkways serving other areas.

For all existing, unmarked crosswalks (as defined by PROWAG) at unsignalized intersections, the installation of crosswalk markings should be considered. However, no crosswalk markings have been recommended where none currently exist. The 2009 MUTCD states that on approaches controlled by STOP or YIELD signs, crosswalk markings should be installed where engineering judgment indicates they are needed to guide pedestrians crossing roadways by defining and delineating paths at stops. Additionally, in conjunction with signs and other measures, crosswalk markings help alert road users to designated pedestrian crossings across roadways at locations not controlled by traffic control signals or STOP or YIELD signs.

Where existing curb ramps lead pedestrians to residential driveway openings or locations where no public rights-of-way sidewalk exists, the existing curb ramp has been recommended for



removal. Other possible solutions have been proposed at these locations to maintain pedestrian access.

A complete list of identified barriers and associated improvements can be found in the sidewalk and unsignalized intersection/driveway facility reports.

TABLE 2. SUMMARY OF CURB RAMP OBSERVATIONS AT UNSIGNALIZED INTERSECTIONS

Curb Ramp Element	Number Evaluated	Number Compliant	Percent Compliant
Surfaces: No obstruction in curb ramp, landing, or flares	2,178	2,140	98.3%
Curb ramp present where curb ramp is required	2,325	2,178	93.7%
Curb ramp running slope $\leq 8.3\%$	2,178	1,857	85.3%
Surfaces: No cracking, ponding in curb ramp, landing, or flares	2,178	1,916	88.0%
Detectable warning surface is compliant	2,178	1,729	79.4%
Curb ramp width $\geq 48"$	2,178	1,573	72.2%
Curb ramp cross slope $\leq 2.1\%$	2,178	1,010	46.4%



3.3 PRIORITIZATION

The following sections outline the prioritization factors and results for sidewalks and unsignalized intersections. Each facility type has a different set of parameters for prioritizing 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 lack acceptable alternative routes or treatments to overcome them.

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 them may or may not exist. Medium-priority barriers may be significant obstacles that prohibit 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 a person with a disability 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 in sidewalk corridors, unsignalized intersections, and driveway crossings were assigned barrier priorities, as defined in **Tables 3** and **4** below. This barrier prioritization methodology was developed by the Consultant Team and has been used by municipalities nationwide to implement Transition Plans; however, it is just one of many factors the Village may consider when developing the Transition Plan implementation strategy (see **Section 5.2, Implementation Strategy**, and **Appendix D** for more information). Barrier priorities for specific locations are listed in the detailed project reports.

TABLE 3. BARRIER PRIORITIES FOR SIDEWALK CORRIDORS

Barrier Priority	Criteria
0 (high)	More than 25% of the Panels are Deteriorated Deterioration is defined as significant cracking or failure of the pavement
1 (high)	10-25% of the Sidewalk Panels are Deteriorated
2 (high)	Major Barriers to Access Found Significant number of sidewalk panels with cross slope violations greater than 6 percent, or sidewalk obstructions reducing the sidewalk clear width below 24 inches
3 (medium)	Moderate Barriers to Access Found Significant number of sidewalk panels with cross slope violations between 4 and 6 percent, or sidewalk obstructions reducing the sidewalk clear width between 24 and 36 inches
4 (medium)	Minor Barriers to Access Found Significant number of sidewalk panels with cross slope violations between 3 and 4 percent, or sidewalk obstructions reducing the sidewalk clear width between 36 and 42 inches
5 (low)	No Significant Barriers to Access Found Significant number of sidewalk panels with very minor cross slope violations between 2.1 and 3 percent, or very minor sidewalk obstructions reducing the sidewalk clear width between 42 and 47 inches

TABLE 4. BARRIER PRIORITIES FOR UNSIGNALIZED INTERSECTIONS

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

*Pedestrian attractors include schools, parks, or other public facilities that would generate more pedestrian traffic.

The average accessibility grade is the same scoring criteria used in **Table 3 for all curb ramps at an unsignalized intersection.



Tables 5 and 6 provide summaries of the prioritization classifications for sidewalk corridors and unsignalized intersections, respectively.

TABLE 5. SIDEWALK BARRIER PRIORITY SCORE DISTRIBUTION

Sidewalk Barrier Priority Score	Sidewalk Corridors	
	Miles	%
5 – No significant Barriers to Access Found	58.0	43.9
4 – Minor Barriers to Access Found	59.1	44.8
3 – Moderate Barriers to Access Found	9.7	7.3
2 – Major Barriers to Access Found	3.4	2.6
1 – 10% to 25% Deteriorated	1.2	0.9
0 – More than 25% Deteriorated	0.6	0.5
Total	132.0	

TABLE 6. UNSIGNALIZED INTERSECTION AND DRIVEWAY BARRIER PRIORITY SCORE DISTRIBUTION

Unsignalized Intersection and Driveway Barrier Priority Score	Intersections	
	Number	%
0 (Compliant)	11	1.9
1 (High)	20	34.0
2 (High)	95	16.3
3 (Medium)	91	15.6
4 (Medium)	197	33.8
5 (Low)	169	29.0
Total	583	



3.4 MAINTENANCE VERSUS ALTERATIONS

The United States Department of Justice (DOJ) has issued a briefing memorandum clarifying the distinction between maintenance and alteration projects. Information contained in the briefing memorandum is below. It is recommended that this clarification regarding curb ramp installation requirements be shared with the appropriate Village of Libertyville staff.

Briefing Memorandum:

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. The lists below provide 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.

Source: Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act of 1973 (504)

ADA Maintenance:

- ▶ Crack Filling and Sealing
- ▶ Surface Sealing
- ▶ Chip Seals
- ▶ Slurry Seals
- ▶ Fog Seals
- ▶ Scrub Sealing



- ▶ Joint Crack Seals
- ▶ Joint Repairs
- ▶ Dowel Bar Retrofit
- ▶ Spot High-Friction Treatments
- ▶ Diamond Grinding
- ▶ Pavement Patching

ADA Alterations:

- ▶ Open-graded Surface Course
- ▶ Cape Seals
- ▶ Mill & Fill/Mill & Overlay
- ▶ Hot In-Place Recycling
- ▶ Microsurfacing/Thin Lift Overlay
- ▶ Addition of New Layer of Asphalt
- ▶ Asphalt and Concrete
- ▶ Rehabilitation and Reconstruction
- ▶ New Construction

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 the two 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, one curb ramp or a single blended transition that spans all crosswalks 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. 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 where pedestrian crossings are 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 a 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 Village-maintained pedestrian facilities:

- ▶ 132 miles of sidewalk corridors and 583 unsignalized intersections and driveways along the sidewalk corridors.
 - ▶ Approximately 85% of the existing sidewalk network has minor to no significant barriers to access.
 - ▶ Approximately 5% of the existing sidewalk network has significant deterioration or major barriers to access.
 - ▶ Approximately 30% of the existing unsignalized intersections and driveways have low-priority curb ramp deficiencies.
 - ▶ Approximately 50% of the existing unsignalized intersections and driveways have high-priority curb ramp deficiencies.



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 the Village-maintained pedestrian facilities. Conceptual budget estimates for public rights-of-way facilities were based on recent bid tabulations from Illinois Department of Transportation (IDOT) construction projects.

“Conceptual Budget Estimates” include only individual accessibility improvements and refer to the estimated cost of labor and materials for a specific ADA compliance modification, excluding any additional costs for overhead, profit, or project contingencies. It represents the direct expenses associated with performing the modification itself. Cost of other components to be determined by the project manager or project architect. Items include, but are not limited to, project administration, construction mobilization, material testing, design analysis, design, plan review, and contractor costs for the overall project.

A contingency percentage (20%) was added to the subtotal to account for increases in unit prices in the future. All costs are in 2025 dollars.

Conceptual budget estimates were only developed for Village-maintained pedestrian facilities.

The Village is not responsible for maintaining curb ramps or pedestrian crossings along Lake County or IDOT roadways unless a maintenance agreement is in place. Similarly, the Village is not responsible for transit stops maintained by Pace Suburban Bus.

Table 7 below shows the conceptual budget estimates for each facility type and the assigned priority level.

TABLE 7. SUMMARY OF CONCEPTUAL BUDGET ESTIMATES FOR VILLAGE OF LIBERTYVILLE PEDESTRIAN FACILITIES

Facility Type	High Priority	Medium Priority	Low Priority	Total*
Village-Maintained Sidewalk	\$146,000	\$4,603,500	\$12,157,000	\$16,906,500
Village-Maintained Unsignalized Intersections and Driveways	\$911,000	\$1,035,500	\$2,153,000	\$4,099,500
Village of Libertyville Totals	\$1,057,000	\$5,639,000	\$14,310,000	\$21,006,000

**Table values are rounded for simplification*

It is important to note that the facility conceptual budget estimates in **Table 7** include only the budget for remedying accessibility non-compliance identified through 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;
- ▶ 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 Village in determining the best overall design solutions, taking into account existing conditions, the available construction budget, and the need to address all out-of-compliance elements in a particular area of the facility.



4.2 IMPLEMENTATION SCHEDULE

This ADA Transition Plan will serve as a multi-year blueprint for barrier removal projects in the Village. It will serve as a vital resource for identifying project areas where accessibility improvements will have the greatest impact, and annual budgets will vary to accommodate project scopes. The Village of Libertyville reserves the right to change barrier-removal priorities on an ongoing basis to accommodate community requests, petitions for reasonable modifications from people with disabilities, and changes in Village programs.

It is the intent of the Village to have its ADA/504 Coordinator work with department heads and budget staff over the next several years to determine the placement of projects in the annual Capital Improvement Plan (CIP) and the Road Rehabilitation Program, to be addressed on a fiscal year basis.



4.3 FUNDING OPPORTUNITIES

Several alternative funding sources are available to the Village to make the improvements in this Transition Plan. The funding opportunities include applying for resources at the federal, state level, and local levels. The following sections detail various funding options.

4.3.1 FEDERAL AND STATE FUNDING

Federal and state funding is available through multiple agencies for the Village to pursue 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 Village of Libertyville is not guaranteed to receive these funds. It will be important for the Village 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

There are several local funding options for the Village to consider, including:

- ▶ Community Improvement District (CID) – A geographically defined district in which commercial property owners vote to impose a self-tax. Funds are then collected by the taxing authority and given to a board of directors elected by the property owners.
- ▶ Congestion Mitigation and Air Quality (CMAQ) – The Infrastructure Investment and Jobs Act continues the Congestion Mitigation and Air Quality Improvement Program (CMAQ) to provide a flexible funding source to State and local governments for transportation projects and programs to help meet the requirements of the Clean Air Act. Funding is available to reduce congestion and improve air quality in areas that do not meet the National Ambient



Air Quality Standards for ozone, carbon monoxide, or particulate matter (nonattainment areas) and in former nonattainment areas now in compliance (maintenance areas).

- ▶ General fund (sales tax and bond issue)
- ▶ Illinois Transportation Enhancement Program (ITEP) - The goal of the Illinois Transportation Enhancement Program is to allocate resources to well-planned smaller scale, but critically important projects that provide and support connected alternate modes of transportation that are safe for all users, enhance the transportation system through preservation of visual and cultural resources, and improve the quality of life for members of the communities impacted.
- ▶ Scheduled/funded CIP projects that are funded through bonds
- ▶ Sidewalk or Access Improvement Fee
- ▶ Special tax districts – A district with the power to provide some governmental or quasi-governmental service and to raise revenue by taxation, special assessment, or charges for services.
- ▶ Surface Transportation Program (STP) – The Surface Transportation Program (STP) provides flexible funding that may be used by States and localities for projects to preserve and improve the conditions and performance of any Federal-aid highway, bridge, and tunnel projects on any public road, pedestrian and bicycle infrastructure, and transit capital projects, including intercity bus terminals.
- ▶ Tax Allocation District (TAD) – A defined area where real estate property tax monies gathered above a certain threshold for a certain period (typically 25 years) are to be used for a specified improvement. The funds raised from a TAD are placed in a tax-free bond (finance) where the money can continue to grow. These improvements are typically for revitalization and especially for complete redevelopment efforts.
- ▶ Tax Increment Financing District (TIF) – A TIF allows cities to create special districts and to make public improvements within those districts that will generate private-sector development. During the development period, the tax base is frozen at the pre-development level. Property taxes continue to be paid, but taxes derived from increases in assessed values (the tax increment) resulting from new development either go into a special fund created to retire bonds issued to finance the development or are used to leverage future growth in the district.
- ▶ Transportation Alternatives Program (TAP) – The Transportation Alternatives (TA) Set-Aside from the Surface Transportation Block Grant (STBG) Program provides funding for a variety of generally smaller-scale transportation projects such as pedestrian and bicycle facilities; construction of turnouts, overlooks, and viewing areas; community improvements such as historic preservation and vegetation management; environmental mitigation related to stormwater and habitat connectivity; recreational trails; safe routes to school projects; and vulnerable road user safety assessments.
- ▶ Transportation User Fee / Street Maintenance Fee



5.0 TRANSITION PLAN

Per the ADA Regulations §35.150 Existing Facilities, the Village is not required to make structural changes in existing facilities where other methods are effective in achieving compliance. If structural changes to facilities are undertaken to improve program accessibility, the Village is required to develop a transition plan outlining the steps necessary to complete them. The transition plan shall, at a minimum:

- ▶ Identify physical obstacles in the Village'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 Village 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 Village has identified physical obstacles that limit the accessibility of Village programs and activities for 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. Based on the conceptual budget estimates, the transition period will exceed one year (see **Section 4.0, Facility Conceptual Budget Estimates**). Accordingly, the following steps to achieve compliance will be taken by the Village 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 Village of Libertyville ADA Transition Plan will be:

Deputy Village Administrator, ADA/504 Coordinator
118 W Cook Avenue
Libertyville, IL 60048
Office: 847-362-2430
Relay: 7-1-1
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5.2 IMPLEMENTATION STRATEGY

To implement improvements identified in the Transition Plan, the Village plans to include accessibility barrier removal in the annual budgeting process and to update the Village's CIP. The Village plans to address high-priority barriers first, ensuring that the most critical accessibility obstacles are remediated. Once these high-priority barriers are resolved, the Village will implement improvements to lower-priority barriers as funding becomes available. This phased approach allows for the most significant impacts to be realized early in the transition period, while also ensuring continued progress toward compliance as resources permit.

Minimizing risk for pedestrians and providing equitable improvements are the Village'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 Village 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 at greater risk if no improvements are made despite the issue.
- ▶ **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) and are more likely to have a higher risk compared to those locations without pedestrian attractors. The ADA does not require the installation of sidewalks, but existing sidewalks must comply, 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 Village has included demographic-based scoring, using data from 2024 Census Tracts, to help determine where improvements will have a greater impact on disadvantaged populations. Facilities located in Census Tracts with higher concentrations of the demographics outlined below can be assigned higher weights to prioritize their improvements.

Appendix D provides a project implementation and prioritization tool that combines the demographic factors described below with accessibility-compliance prioritization information and public feedback from the outreach methods described in Chapter 2.

- ▶ **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 more 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 population is more likely to have mobility issues and, therefore, 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 on pedestrian facilities for travel.

The Village intends to review the ADA Transition Plan annually, particularly during the development of the annual budget. The factors above will be considered by the Village in selecting projects for accessibility improvements for implementation.

The Village intends to begin by focusing its efforts and available resources on implementing improvements that will eliminate high-priority barriers, as determined by the severity of non-compliance, proximity to pedestrian attractors, and demographic need. Lower-priority barriers will be addressed as additional funding becomes available, ensuring that the most critical areas are addressed first while maintaining a plan to remediate identified barriers over time.



5.3 REMEDIATION TRACKING AND MONITORING

In accordance with ADA Title II, the Village will record its progress by eliminating accessibility barriers using an ADA Action Log. At a minimum, the Engineering Division will annually evaluate which barriers have been addressed and what will be targeted for removal in the upcoming years.



6.0 CONCLUSION AND NEXT STEPS

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

The next steps for the Village of Libertyville are:

1. Begin by focusing its efforts and available resources on implementing improvements that will eliminate high-priority accessibility barriers, as determined by the severity of non-compliance, proximity to pedestrian attractors, and demographic need. Lower-priority barriers will be addressed as additional funding becomes available, ensuring that the most critical areas are addressed first while maintaining a plan to remediate identified barriers over time.
2. Because it recognizes that not all ADA barriers will automatically be addressed through existing programs, projects, and policies, the Village has allocated additional annual funds to support ADA-compliant infrastructure efforts. This funding could be added to current ADA-related programs to expand their scope or used for independent ADA projects, depending on staff's judgment of the most efficient use of resources and barrier priorities. This yearly allocation may change as part of the Village's annual budgeting process.
3. Document current and ongoing ADA remediation efforts to be able to track and monitor the Village's progress toward ADA compliance.
4. Continue to update the Village'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.



APPENDIX

Appendix A: Public Outreach

Public Access Survey

Interactive Map Results

Appendix B: Grievance Procedure and Public Notice

Title II Grievance Procedure

Title II Grievance Form

ADA Public Notice

Appendix C: Evaluated Facility Maps

Public Rights-of-Way Sidewalk Corridors

Appendix D: Project Implementation and Prioritization Tool

Sidewalk Corridors

Unsignalized Intersections