



City of Warrenville

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

March 2026



Prepared by:

Kimley»Horn
Expect More. Experience Better.

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

In association with:



Chicago Metropolitan Agency for Planning



DeepWalk
Deepwalk

The City of Warrenville has prepared this ADA Transition Plan with the assistance of the consultant team led by Kimley-Horn and Associates, Inc. The Consultant Team, the Chicago Metropolitan Agency for Planning, the City's ADA/504 Coordinator, and the contributing departments of the City of Warrenville are responsible for developing the ADA Self-Evaluation and Transition Plan.

TABLE OF CONTENTS

Table of Contents	i
List of Tables	iii
List of Figures	iii
Abbreviations Glossary	iv
1.0 Introduction	1
1.1 Purpose	1
1.2 Legislative Mandate	1
1.3 ADA Self-Evaluation and Transition Plan Development Requirements and Process	1
1.4 Discrimination and Accessibility	2
1.4.1 Ongoing Accessibility Improvements	2
1.4.2 City of Warrentville Approach	3
1.4.3 Exceptions and Exemptions	3
1.5 New Construction and Alterations	4
1.6 Existing City Programs that Implement ADA Upgrades	6
2.0 Public Outreach	8
2.1 Engage with CMAP Project Webpage	8
2.2 Steering committee	9
2.3 In-Person Interviews	10
2.4 Public Engagement Events	10
3.0 Self-Evaluation and Summary of Observations	13
3.1 Services, Policies, and Practices Review	13
3.1.1 ADA/504 Coordinator	14
3.1.2 Roles and Responsibilities of the ADA/504 Coordinator	14
3.1.3 ADA Title II Grievance Policy, Procedure, and Form with Appeals Process	15
3.1.4 Public Notice Under the ADA	15
3.1.5 City Ordinance Review	15
3.1.6 Snow Removal	16
3.2 City-Owned Facilities Review	16
3.2.1 Sidewalk Corridors	16
3.2.2 Buildings	22
3.3 Barrier Prioritization Factors	23
3.4 Maintenance Versus Alterations	25
3.5 Closing Crossings	26
3.5.1 Crosswalks at Intersections	26
3.5.2 Mid-block and Roundabout Crosswalks	27

4.0 Facility Conceptual Budget Estimates	28
4.1 Facility Conceptual Budget Estimate Overview	28
5.0 Transition Plan	29
5.1 Transition Plan Requirements.....	29
5.2 Implementation Strategy.....	30
5.3 Implementation Schedule	30
5.4 Remediation Tracking and Monitoring.....	31
6.0 Conclusion and Next Steps	32
Appendix.....	33
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: Facility Maps	
Public Rights-of-Way Sidewalk Corridors	
Appendix D: Project Implementation and Prioritization Tool	
Public Rights-of-Way Sidewalk Corridors	
Unsignalized Intersections	

LIST OF TABLES

Table 1. Summary of Applicable Standards.....	4
Table 2. Summary of Curb Ramp Observations at Unsignalized Intersections	21
Table 3. Barrier Priorities for Sidewalk Corridors.....	23
Table 4. Barrier Priorities for Unsignalized Intersections and Driveways.....	24
Table 5. Sidewalk Barrier Priority Score Distribution	24
Table 6. Unsignalized Intersection and Driveway Barrier Priority Score Distribution.....	24
Table 7. Summary of Conceptual Budget Estimates for Facilities Under City Maintenance.....	28

LIST OF FIGURES

Figure 1. City of Warrenville ADA Transition Plan Flyer	9
Figure 2. Concerts on the Commons Event.....	11
Figure 3. Summerlakes HOA Picnic Event Public Input Map	12
Figure 4. Evaluated Sidewalk Corridors.....	17
Figure 5. Excessive Cross Slopes	18
Figure 6. Tripping Hazards	19
Figure 7. Permanent Obstructions	19
Figure 8. Temporary Vegetation Obstructions	20

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 the U.S. Supreme Court decisions had narrowed.

ADAAG – Americans with Disabilities Act Accessibility Guidelines

Document that contains scoping and technical requirements for accessibility to buildings and facilities by individuals with disabilities under the ADA of 1990. These scoping and technical requirements 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.

CMAP – Chicago Metropolitan Agency for Planning

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

DOJ – United States Department of Justice

Under the leadership of the Attorney General of the United States, the Justice Department comprises more than 40 organizations and more than 115,000 employees. Headquartered at the Robert F. Kennedy Building in Washington, D.C., the Department maintains field offices in 50 states and territories of the United States, as well as 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.

IDOT – Illinois Department of Transportation

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

MUTCD – Manual on Uniform Traffic Control Devices

By setting minimum standards and providing guidance, the MUTCD ensures uniformity in traffic control devices (TCD) nationwide. 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 City of Warrenville to update its public rights-of-way to meet current ADA design standards. The prioritization methodology for evaluating and implementing improvements was developed based on the applicable ADA Standards, the Public Rights-of-Way Accessibility Guidelines (PROWAG), and various demographic factors, as detailed in this document.

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



1.2 LEGISLATIVE MANDATE

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

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

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

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



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

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

The City of Warrenville 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 a 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 to track progress in addressing barriers.

This document describes the process developed to complete the evaluation of the City of Warrenville's PSAs and facilities, proposes solutions to remove programmatic barriers, and presents a Transition Plan to modify facilities within the public rights-of-way to improve accessibility. This process will guide the planning and implementation of necessary program and facility modifications for many years to come. The ADA Self-Evaluation and Transition Plan is significant because it establishes the City's ongoing commitment to developing and maintaining facilities accessible to all 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
- ▶ Provision of auxiliary aids
- ▶ Transportation
- ▶ Policies
- ▶ Communication

1.4.1 ONGOING ACCESSIBILITY IMPROVEMENTS

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

1.4.2 CITY OF WARRENVILLE APPROACH

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

The City of Warrentville should make reasonable modifications in PSAs when necessary to avoid discrimination based on disability, unless the City can demonstrate that making the modifications would fundamentally alter the nature of the program, service, or activity. The City of Warrentville will not impose 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. In the event the City 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 City 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 City.

EXISTING FACILITIES

A public entity is not required to make structural changes in existing facilities if other methods make 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 City should first confirm if the property is a qualified historic building or facility, which the ADA defines as a “building or facility that is listed in or eligible for listing in the National Register of Historic Places, or designated as historic under an appropriate state or local law.” Based on a search of the National Register of Historic Places NPGallery Database and the associated geodatabase, there are no registered historic places within the City; however, consideration should be given to the Warren Tavern and the Warrenville Museum. Additionally, other documentation may be available that is not provided on these websites.

- ▶ [National Register of Historic Places website](#)
- ▶ [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 separation, administrative, or fiscal relationship of the facility or facilities in question to the covered entity.



1.5 NEW CONSTRUCTION AND ALTERATIONS

Per 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 commences on or after September 15, 2010 (see **Table 1**).

TABLE 1. SUMMARY OF APPLICABLE STANDARDS

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

The U.S. Access Board is an independent federal agency that advances accessibility through leadership in accessible design and 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 were also adopted as DOJ standards that 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 set 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, revised regulations constitute the enforceable accessibility standards known as the 2010 ADA Standards. On March 15, 2012, compliance with the 2010 ADA Standards was required for new construction and alterations under Titles II and III of the ADA. March 15, 2012, is also the compliance date for using the 2010 ADA Standards for program accessibility and barrier removal.

Public Rights-of-Way Accessibility Guidelines (PROWAG)

The U.S. Access Board recently published new guidelines under the ADA and the ABA that address access to sidewalks and streets, crosswalks, curb ramps, pedestrian signals, on-street parking, transit stops, and other components of public rights-of-way. These guidelines also address shared-use paths, which are designed primarily for bicyclists and pedestrians for transportation and recreation. The Public Rights-of-Way Accessibility Guidelines (PROWAG) provide minimum requirements for pedestrian facility accessibility in public rights-of-way. When these guidelines are adopted, with or without modifications, as accessibility standards in regulations issued by other federal agencies implementing the ADA, Section 504 of the Rehabilitation Act, and the ABA, compliance with those enforceable accessibility standards is mandatory. The final rule was published on August 8, 2023, and became effective on September 7, 2023. PROWAG is the recommended best practice and can be considered the state of the practice to follow 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 establishes the DOT's regulatory standards for new construction and alterations of transit stops in the public right-of-way. The Final Rule became effective on January 17, 2025. The DOT will also 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 the U.S. Department of Transportation (DOT) and DOJ adopt accessibility standards for pedestrian facilities in the public right-of-way, public entities have some degree of flexibility in determining how they will comply with the general obligation under Title II of the ADA (to operate each service, program, or activity so that it is “readily accessible and useable by” individuals with disabilities). Public entities are not required to adopt the Final PROWAG at this time. Still, they may turn to different resources for guidance (e.g., Final PROWAG, DOJ’s 2010 ADA Standards for buildings and sites, and other accessibility resources). However, it is recommended that the City of Warrenville adopt PROWAG to make it an enforceable document for all City projects within the public rights-of-way, regardless of PROWAG’s adoption status at the state and federal levels.

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

The MUTCD defines the standards used by road managers nationwide to install and maintain traffic control devices on all streets, highways, pedestrian and bicycle facilities, and site roadways open to public travel. The FHWA publishes the MUTCD under 23 CFR, Part 655, Subpart F, which 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, effective 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 CITY PROGRAMS THAT IMPLEMENT ADA UPGRADES

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

ANNUAL TRIP HAZARD REMOVAL PROGRAM

- ▶ Annual program addressing tripping hazards through saw-cutting and spot replacement of unsafe sidewalk panels
- ▶ Over 11 miles of sidewalk have been repaired to date.

PUBLIC WORKS DEPARTMENT ANNUAL ROAD PROGRAM

- ▶ The Public Works Department Annual Road Program encompasses curb and gutter, pavement, and sidewalk maintenance, all of which improve pedestrian access in the public rights-of-way and help maintain accessible routes within the City of Warrenville.

- ▶ City staff repairs potholes, which helps to eliminate disruptions in the roadway surface. Additional services include preparation and repairs of paved surfaces, as required throughout the City, including when these elements intersect the pedestrian path of travel.
- ▶ A comprehensive program that outlines the major infrastructure projects over the next 20 years.
- ▶ The City's Annual Road Program is a crucial tool for managing and financing large-scale projects, which can include accessibility improvements, strategically and efficiently.

ALTERNATIVE FUNDING MECHANISMS

- ▶ The City seeks out alternative funding mechanisms, such as the Community Development Block Grant (CDBG) Program, Surface Transportation Program (STP), and the Illinois Transportation Enhancement Program (ITEP), and monitors other grant opportunities to fund improvements.

2.0 PUBLIC OUTREACH

Gathering public feedback was a vital step in developing the City of Warrenville's ADA Transition Plan. Several outreach efforts were completed. These events were designed to engage the community, gather valuable input, and help ensure that accessibility improvement efforts are effective and inclusive for all residents.

In coordination with the Chicago Metropolitan Agency for Planning (CMAP), a Communications and Outreach Strategy was developed to support the development and facilitation of public input initiatives throughout the project. This strategy consisted of:

- ▶ The development of a project webpage containing project information, as well as a public access survey and issue mapping tool
- ▶ The development of a steering committee made up of community stakeholders
- ▶ In-person interviews with members of the public and disability community
- ▶ In-person public engagement events; and
- ▶ A municipal meeting to receive public input on the City's draft ADA Transition Plan.

The following sections detail the outreach efforts conducted during the plan's development.



2.1 ENGAGE WITH CMAP PROJECT WEBPAGE

In collaboration with CMAP, a project webpage dedicated to the City of Warrenville's ADA Transition Plan was developed. The webpage was made available at the following link:

[Warrenville plan for accessible streets and sidewalk project webpage.](#)

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

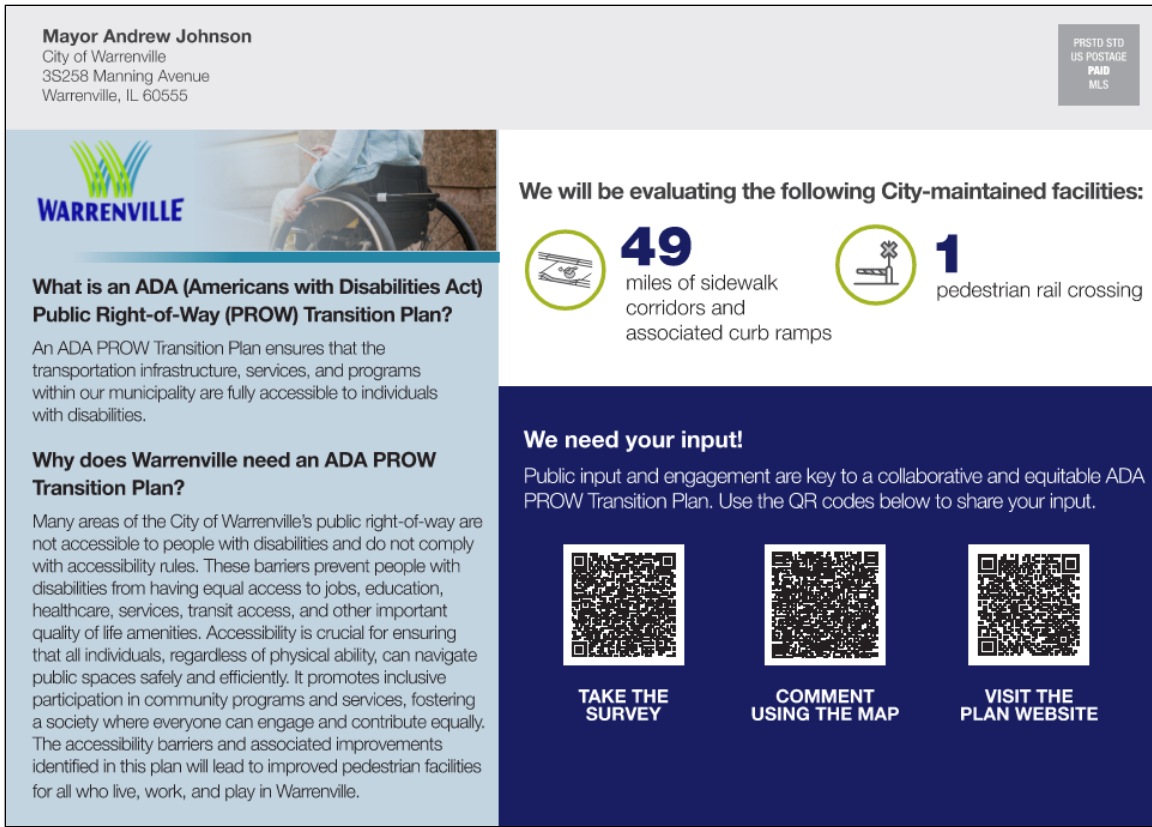
Throughout the project, the City regularly publicized the project webpage on its website, social media, and flyers. The materials included QR codes that directed residents to the project website. A copy of the project flyer is shown in **Figure 1** below.

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

The survey generated a total of 68 responses

- ▶ Around 55% responded positively when asked about barriers in the public rights-of-way
- ▶ Around 85% responded positively when asked about programmatic barriers
- ▶ Around 63% of respondents believe the City is accommodating people with disabilities
- ▶ Around 85% of respondents obtain available information from the City website and social media

FIGURE 1. CITY OF WARRENVILLE ADA TRANSITION PLAN FLYER



Mayor Andrew Johnson
City of Warrenville
3S258 Manning Avenue
Warrenville, IL 60555

WARRENVILLE

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 Warrenville need an ADA PROW Transition Plan?

Many areas of the City of Warrenville'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 Warrenville.

We will be evaluating the following City-maintained facilities:

- 49** miles of sidewalk corridors and associated curb ramps
- 1** pedestrian rail crossing

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**

PRSTD STD
US POSTAGE
PAID
MLS

The online interactive map garnered 21 responses; the feedback identified several locations where curb ramps are missing, as well as areas of concern for sidewalks and crosswalks.

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



2.2 STEERING COMMITTEE

A steering committee was formed during the development of the Transition Plan. The committee provided project direction, reviewed key deliverables, and assisted with public outreach efforts. City 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 residents to interview, coordinate public outreach events, and discuss accessibility in Warrenville.

- ▶ May 12, 2025
- ▶ June 25, 2025
- ▶ August 27, 2025
- ▶ March 4, 2026

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



2.3 IN-PERSON INTERVIEWS

To gather more direct feedback, the consultant team facilitated seven (7) in-person interviews with members of the Steering Committee, City staff, and interested members of the public.

The interviews, conducted from September through November 2025, provided insight into current conditions and residents' vision for the community. Overall, the interviewees were excited to see the City continuing to improve accessibility and expressed optimism that future generations will be better able to participate in the public right-of-way, attend activities, and foster greater discussion about accessibility as a result of these efforts.

Some of the areas noted by the interviewees for potential consideration include multiple locations along Warrenville Road, Batavia Road, and Butterfield Road. In addition to these areas, street lighting was identified as a potential improvement to increase accessibility within the City, with some interviewees noting that intersections and sidewalks were more complex to navigate without more light. Regarding pedestrian safety, a few residents also noted that at particularly busy intersections, it was difficult to cross and would like to see additional warning signs, reduced speeds, red-light cameras, or even a pedestrian bypass to improve accessibility.

Residents also noted difficulties navigating the pedestrian facilities at transition points between City and State or County maintenance areas, particularly at locations where maintenance differences create barriers. Additionally, some noted in their interviews that the layouts of events, such as Art on the Prairie and the Merry Market, made it challenging to accommodate accessibility needs. Interviewees requested that the City ensure future booths do not block crosswalks, curb cuts, or pedestrian ramps.



2.4 PUBLIC ENGAGEMENT EVENTS

The City hosted three (3) public engagement events in 2025 to receive feedback from project stakeholders and the public.

The first event was the Concerts on the Commons, held on July 2nd at the Warrenville Park District. Attendees received flyers with QR codes and an overview of the project, and everyone was encouraged to visit the project webpage and complete the survey and interactive map. Laptops and tablets, physical copies of the survey, and map boards and stickers were made available to those unable to access or navigate the webpage.

The second event was held on July 20th at the Summerlakes Homeowners Association Picnic. During this meeting, project flyers were distributed, and attendees were encouraged to use the online survey and project map to share their opinions on the community's needs. Additionally, a map board and stickers were available for people to indicate existing issues within the community. A map of the information gathered during the event is shown in **Figure 3**.

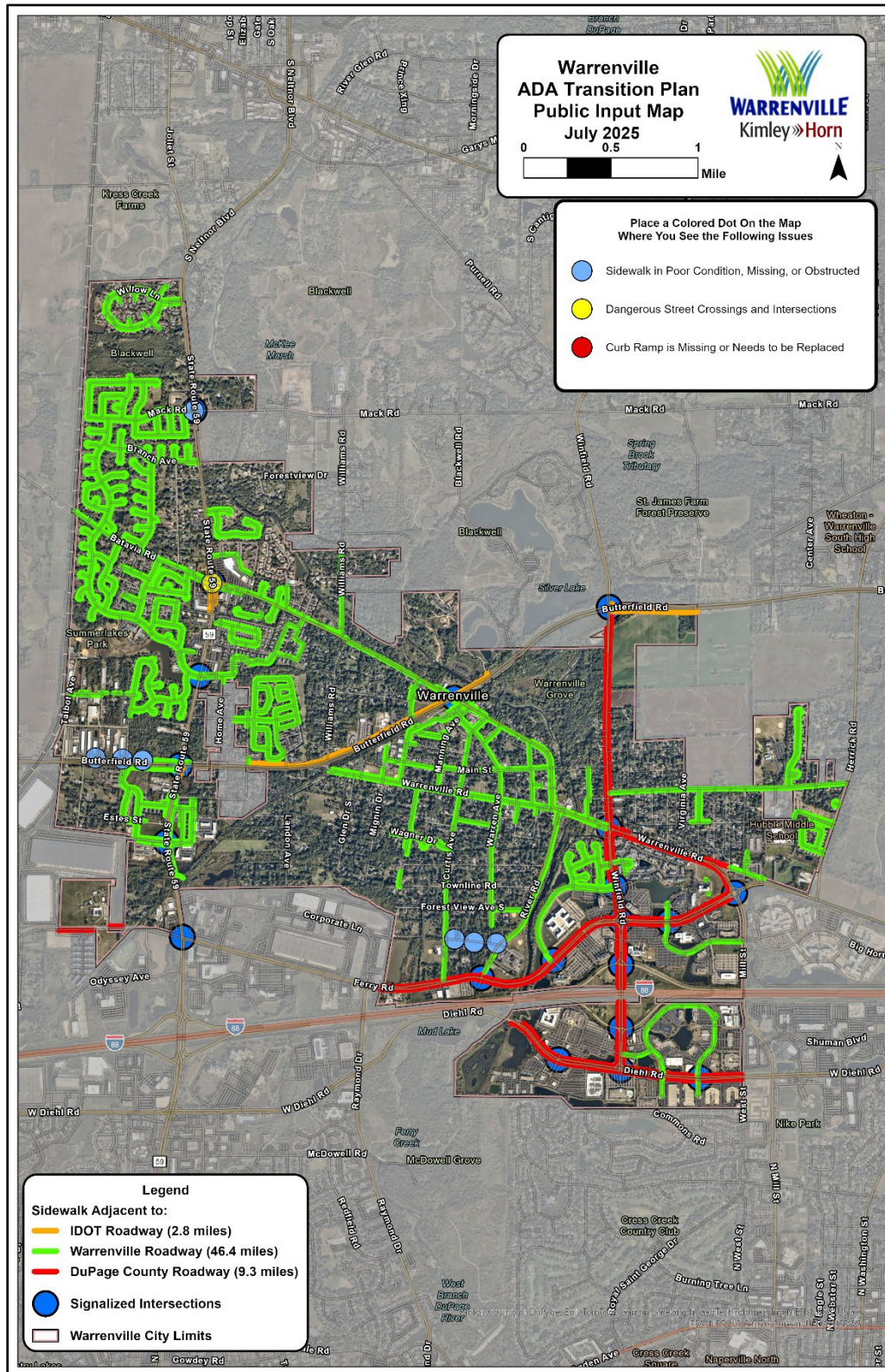
The third event was held on August 5th during the National Night Out. During this meeting, a table was set up with both physical and digital methods for attendees to provide input on the project, along with an interactive board game for them to play.

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

FIGURE 2. CONCERTS ON THE COMMONS EVENT



FIGURE 3. SUMMERLAKES HOA PICNIC EVENT PUBLIC INPUT MAP



3.0 SELF-EVALUATION AND SUMMARY OF OBSERVATIONS

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



3.1 SERVICES, POLICIES, AND PRACTICES REVIEW

Under the ADA, the City of Warrenville is required to complete a Self-Evaluation of the City's services, policies, and practices, and to operate each service, program, and activity so that it is readily accessible and usable by individuals with disabilities. The Self-Evaluation identifies and proposes possible solutions for services, policies, and practices that are inconsistent with Title II requirements. To be compliant, the Self-Evaluation should consider all the City's programs, services, and activities, as well as the policies and practices used to implement them.

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

- ▶ 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 to provide program access, the City should prioritize the option that promotes inclusion for all users, including individuals with disabilities.

PSAs that the City offers to the public must be accessible. Accessibility applies to all aspects of a program, services, or activity, including:

- ▶ Advertisement
- ▶ Orientation
- ▶ Eligibility
- ▶ Participation
- ▶ Testing or evaluation
- ▶ Physical access
- ▶ Provision of auxiliary aids
- ▶ Transportation
- ▶ Policies
- ▶ Communication

However, the City 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 and/or administrative burden. This determination should generally be made by the ADA/504 Coordinator and/or an authorized designee of the City, such as the City Mayor or their designee. It must be accompanied by a written statement detailing the reasons for reaching the determination.

The determination of undue burden must be based on an evaluation of all available resources. If a barrier-removal action is deemed unduly burdensome, the City 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 City employee who can assist with questions and concerns regarding disability discrimination.

The City of Warrenville has appointed the Assistant City Administrator as ADA/504 Coordinator for Title II. Below is the City of Warrenville's ADA/504 Coordinator's contact information.

**Assistant City Administrator/
ADA/504 Coordinator
3S258 Manning Avenue
Warrenville, IL 60555
Phone: (630) 836-3050
Fax: (630) 393-6948
Email: adacoordinator@warrenville.il.us**

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

- ▶ Post on the City website;
- ▶ Prominently display in common areas that are accessible to all employees and areas open to the public;
- ▶ Provide in materials that the City distributes 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 City where ADA questions or concerns may arise.

3.1.2 ROLES AND RESPONSIBILITIES OF THE ADA/504 COORDINATOR

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

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

The responsibilities of the ADA/504 Coordinator include coordinating the City's efforts to comply with Title II and investigating 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 for effective communication, such as a sign language

interpreter or Braille documents. 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 at the following link. [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 must promptly and fairly adopt and publish procedures for resolving grievances arising under Title II of the ADA. The DOJ's Title II Toolkit suggests the grievance procedure include:

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

The City of Warrentville's ADA Title II ADA Grievance Policy, Procedure, and Form were updated in March 2025. The Title II ADA Grievance Policy, Procedure, and Form can be found in **Appendix B** and are available on the City's website here: [City of Warrentville'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 regarding 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 City of Warrentville's Public Notice under the ADA was updated in March 2025 and is available in **Appendix B** and is also posted on the City's website here: [City of Warrentville's Public Notice under the ADA](#).

3.1.5 CITY ORDINANCE REVIEW

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

- ▶ **Sec 6-6-1** – The City requires that trees and shrubs not interfere with the passage of persons or vehicles on the street or sidewalks.
- ▶ **Sec 7-2-2** – The City does not permit seating areas that are accessory to a food and/or beverage service establishment to encroach upon the Public Rights-of-Way.
- ▶ **Sec 7-2-3-14** – The City requires that if any excavation work blocks any sidewalk, a temporary sidewalk shall be constructed or provided that is safe for travel and convenient for users.
- ▶ **Sec 7-2-4** – The City does not permit the deposit of snow or ice onto any public street, public way, or onto any sidewalk that could create a potential hazard to pedestrians.

3.1.6 SNOW REMOVAL

The City prioritizes snow and ice removal on its more than 53 miles of roadway. The streets are prioritized by their functional classification and usage.

1. Primary Streets
2. Side Streets
3. Cul-de-Sacs
4. School crossings near schools

The City also clears sidewalks at the following locations:

- ▶ Sidewalks around City buildings.
- ▶ Batavia Road path, from Illinois Route 56 to Fermilab. The path is used by City equipment to access Warrenville west of Illinois Route 59 during snow and ice events.
- ▶ Only after roadways are addressed, staff clear snow on the path on the north side of Route 56, and the path on the east side of River Road between Warrenville Road and Ferry Road.



3.2 CITY-OWNED FACILITIES REVIEW

All existing pedestrian facilities within the City of Warrenville have been evaluated for compliance with applicable ADA standards and guidelines, and the results of these evaluations are summarized in this section. Pedestrian facilities are located along the City of Warrenville, Illinois Department of Transportation (IDOT), and DuPage County roads. DuPage County has also completed an ADA Transition Plan, and the data collected through that project has been provided to the City.

The City is responsible for maintaining all sidewalk facilities along IDOT roadways. The results of these evaluations are summarized in this report.

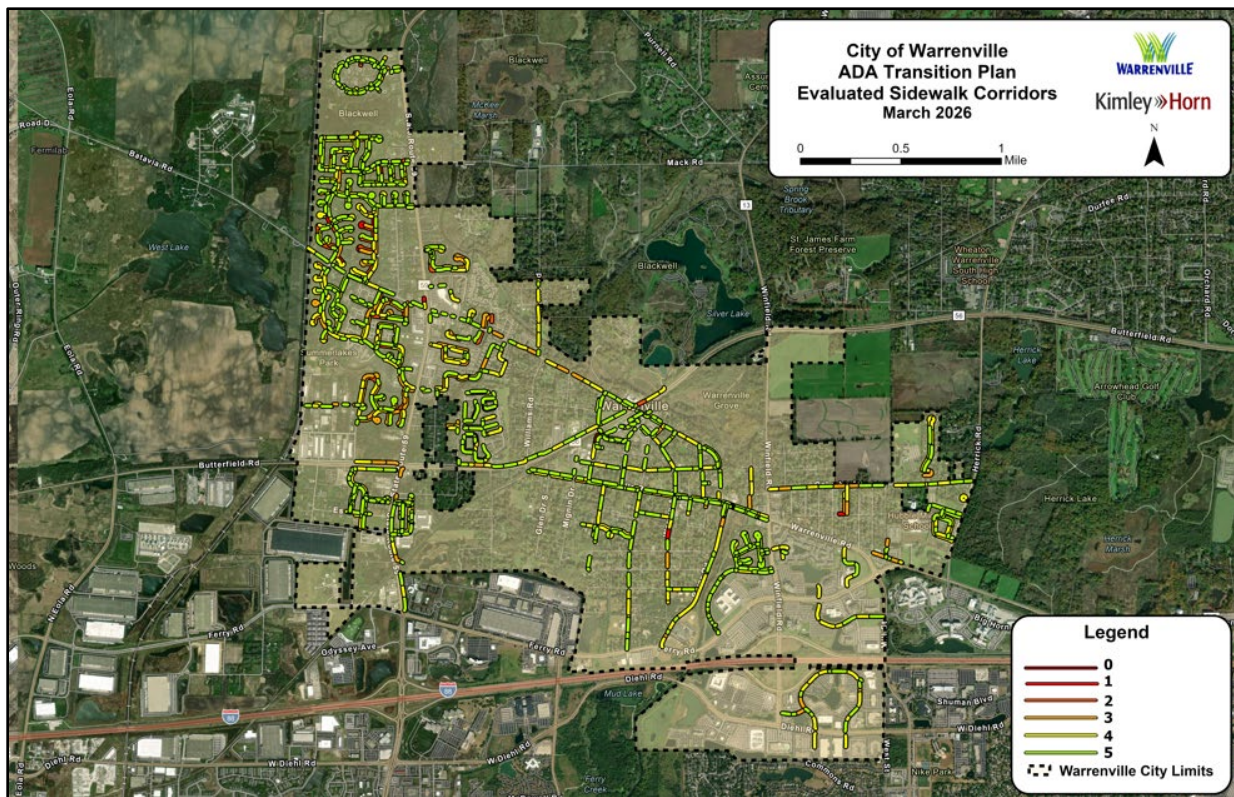
Over the next several years, all City buildings offering public programs will be evaluated for ADA compliance. Once the facility assessments are completed, the compliance results and findings will be summarized in **Section 3.2.2**.

3.2.1 SIDEWALK CORRIDORS

The sidewalk corridor evaluations documented conditions and measurements along the pedestrian path of travel within the public rights-of-way, including sidewalks, pedestrian street

and driveway crossings, curb ramps, and at-grade pedestrian railroad crossings. Approximately 60 miles of sidewalk corridors (excluding pedestrian street crossings) were evaluated within the City limits. A map of the evaluated sidewalk corridors is shown below in **Figure 4** and is also provided in **Appendix C**. The City is responsible for maintaining the sidewalk along IDOT roadways, while IDOT is responsible for the curb ramp and pedestrian street crossing along those roadways. A summary of the evaluation observations and compliance status for all curb ramps and pedestrian street crossings along IDOT-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). The scoring system considered several factors, including:

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

Sidewalk scores for the entire City network are shown above in **Figure 4** and summarized in **Section 3.3**. More detailed scoring information and locations are available in the detailed sidewalk reports.

Common observations along the sidewalk corridors were:

- ▶ Excessive cross slopes (see **Figure 5**)
- ▶ Tripping hazards (see **Figure 6**)
- ▶ Permanent obstructions in the sidewalk, such as power poles or utilities (see **Figure 7**)
- ▶ Temporary obstructions in the pedestrian circulation path, such as weeds and low-hanging branches (See **Figure 8**)

FIGURE 5. EXCESSIVE CROSS SLOPES



FIGURE 6. TRIPPING HAZARDS



FIGURE 7. PERMANENT OBSTRUCTIONS



FIGURE 8. TEMPORARY VEGETATION OBSTRUCTIONS



UNSIGNALIZED INTERSECTIONS: SELF-EVALUATION OBSERVATIONS

Common curb ramp observations at unsignalized intersections and driveways along the sidewalk corridors included:

- ▶ Curb ramps with non-compliant cross slopes
- ▶ No presence of color contrast or texture contrast (detectable warning surfaces).

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

For all existing marked crosswalks at unsignalized intersections, crosswalk markings are recommended to be replaced where they are worn, do not meet minimum width requirements, or will need to be replaced due to compliance issues with the underlying pavement. The 2009 MUTCD states that on approaches controlled by STOP or YIELD signs, crosswalk markings should be installed where engineering judgment dictates they are needed to guide pedestrians crossing roadways by defining and delineating paths on approaches where traffic 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.

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. Where a curb ramp leads a pedestrian to a crosswalk, but there is no receiving curb ramp, a receiving curb ramp has been recommended to be installed, except at locations where a residential driveway provides an opportunity for the pedestrian to remove themselves from the vehicular path of travel. 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.

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

TABLE 2. SUMMARY OF CURB RAMP OBSERVATIONS AT UNSIGNALIZED INTERSECTIONS

Curb Ramp Element	Number Evaluated	Number Compliant	Percent Compliant
Curb ramp present where curb ramp is required	1,131	999	88.3%
Curb ramp running slope $\leq 8.3\%$	999	913	91.4%
Curb ramp width $\geq 45''^*$	999	854	85.5%
Detectable warning surface is compliant	999	604	60.5%
Curb ramp cross slope $\leq 2.4\%^*$	999	196	19.6%

**Values have been adjusted for data collection tolerances*

3.2.2 BUILDINGS

Over the next several years, all City buildings offering public programs will be evaluated for ADA compliance. The ADA Transition Plan will be updated periodically to include the findings of the building compliance reviews and any associated barriers to program access.

BUILDINGS: SELF-EVALUATION OBSERVATIONS

Following the evaluations, this section will record the key observations identified during the assessments.

BUILDINGS: POSSIBLE SOLUTIONS

A complete list of the possible solutions identified in the evaluations will be included in the facility reports.

[The remainder of this page was intentionally left blank.]



3.3 BARRIER PRIORITIZATION FACTORS

The identified barriers to access were categorized into three priority levels based solely on their accessibility.

High-priority barriers prevent access for a person with a disability, make access exceptionally difficult, or pose 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 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 also be significant obstacles to access, but for which alternative access is available, or assistance is readily available to navigate around the barrier. The presence of the medium priority barrier may pose a minor hazard to individuals with disabilities attempting to use the facility.

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

Priorities for the physical barriers to access along sidewalk corridors and unsignalized intersections/driveways are defined in **Tables 3** and **4** below. The Consultant Team developed this barrier-prioritization methodology, which is one of many factors the City can consider when developing the Transition Plan implementation strategy (see **Section 5.4, Implementation Strategy** and **Appendix D** for more information). Barrier priorities for specific locations are available in the detailed project reports.

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

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 9 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 7 and 9 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 5 and 7 percent, or sidewalk obstructions reducing the sidewalk clear with between 36 and 42 inches
5 (low)	No Significant Barriers to Access Found Very minor sidewalk obstructions reducing the sidewalk clear width between 42 and 47 inches

TABLE 4. BARRIER PRIORITIES FOR UNSIGNALIZED INTERSECTIONS AND DRIVEWAYS

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

TABLE 5. SIDEWALK BARRIER PRIORITY SCORE DISTRIBUTION

Sidewalk Barrier Priority Score	Sidewalk Corridors	
	Miles	%
0 (High) – More than 25% Deteriorated	0.2	<1%
1 (High) – 10% to 25% Deteriorated	0.6	1%
2 (High) – Major Barriers to Access Found	1.4	2%
3 (Medium) – Moderate Barriers to Access Found	11.2	19%
4 (Medium) – Minor Barriers to Access Found	17.2	29%
5 (Low) – No significant Barriers to Access Found	29.5	49%
Total	60.1	

TABLE 6. UNSIGNALIZED INTERSECTION AND DRIVEWAY BARRIER PRIORITY SCORE DISTRIBUTION

Unsignalized Intersection and Driveway Barrier Priority Score	Intersections and Driveways	
	Number	%
0 (Compliant)	12	3%
1 (High)	77	21%
2 (High)	126	34%
3 (Medium)	46	12%
4 (Medium)	65	17%
5 (Low)	48	13%
Total	374	



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 City of Warrenville staff.

Briefing Memorandum:

The Americans with Disabilities Act of 1990 (ADA) is a civil rights statute that prohibits discrimination against persons with disabilities in all aspects of life, including transportation, and is enforced by regulations promulgated by the United States Department of Justice (DOJ). DOJ regulations require that accessible planning, design, and construction 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 alterations – requiring the installation of curb ramps within the scope of the project – and those that are considered maintenance, which do not require curb ramps at the time of the improvement. The list below provides a summary of the types of projects that fall within maintenance versus alterations.

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

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 corner, one curb ramp or a blended transition shall be provided for each crosswalk, or a single blended transition spanning all crosswalks at the intersection corner may be provided. In alterations where existing physical constraints make compliance with PROWAG technically infeasible, a single curb ramp shall be permitted at the apex of the intersection

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

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

3.5.2 MID-BLOCK AND ROUNDABOUT CROSSWALKS

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

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

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 for only the facilities evaluated were developed for each facility type. Conceptual budget estimates for public rights-of-way facilities were based on recent bid tabulations from City and Illinois Department of Transportation (IDOT) construction projects.

A 15% contingency was added to the estimates to account for engineering design. All costs are in 2025 dollars.

Conceptual budget estimates were developed for all facilities evaluated. **However, the City is not responsible for the maintenance of signalized intersections, curb ramps, and pedestrian street crossings located along county or IDOT roadways.**

The conceptual budget estimates for those facilities are provided in a separate report. **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 FACILITIES UNDER CITY MAINTENANCE

Facility Type	High Priority	Medium Priority	Low Priority	Total*
City-Maintained Sidewalk	\$131,300	\$949,300	\$449,000	\$1,529,600
City-Maintained Unsignalized Intersections and Driveways	\$2,306,000	\$1,450,000	\$384,500	\$4,140,500
Totals	\$2,437,300	\$2,399,300	\$833,500	\$5,670,100

*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 City in determining the best overall design solutions with respect to various factors, including, but not limited to, existing conditions, available construction budget, and consideration of all elements that are out of compliance in a particular area of a facility.

5.0 TRANSITION PLAN

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

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



5.1 TRANSITION PLAN REQUIREMENTS

The City has identified physical obstacles that limit the accessibility of City programs and activities for individuals with disabilities (see **Section 3.2, City-Owned Facilities Review**). Public rights-of-way and building facility remediations will be completed in accordance with the latest version of PROWAG and the 2010 ADA Standards. 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 City on an annual basis:

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

The official responsible for the implementation of the City of Warrenville ADA Transition Plan will be:

ADA/504 Coordinator
3S258 Manning Avenue
Warrenville, IL 60555
Phone: (630) 836-3050
Fax: (630) 393-6948
Email: adacoordinator@warrenville.il.us



5.2 IMPLEMENTATION STRATEGY

To implement improvements that are not included in the City's current Annual Road Program, the City has developed an annual implementation strategy. Minimizing pedestrian risk is the City's goal when determining the order of facility improvements. Several factors can increase risk at a particular location, including:

- ▶ **Public input** – Receiving and taking into consideration feedback from the public to better understand their concerns is recommended. While formal complaints may not have been filed, areas of public concern are more likely to pose a higher risk if no improvements are made to address the issues.
- ▶ **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.

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

The City intends to review the ADA Transition Plan annually, particularly during budget development. The City will consider the factors above when selecting projects for accessibility improvements.

The City 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 IMPLEMENTATION SCHEDULE

This ADA Transition Plan will serve as a multi-year blueprint for barrier removal projects in the City. 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 City of Warrentville 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 City programs.

It is the City's intent for its ADA/504 Coordinator to work with department heads and budget staff over the next several years to determine the placement of projects through private developments, the **City's Annual Road Program**, and the **Annual Trip Hazard Removal Program**, to be addressed on a fiscal-year basis.

The City will also continue to seek alternative funding mechanisms, such as the Community Development Block Grant (CDBG) Program, the Surface Transportation Program (STP), and the Illinois Transportation Enhancement Program (ITEP), and will monitor other grant opportunities to fund improvements.



5.4 REMEDIATION TRACKING AND MONITORING

In accordance with ADA Title II, the City will record progress eliminating accessibility barriers using an ADA Action Log. At a minimum, the City should 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 City of Warrenville.

The next steps for the City of Warrenville are:

1. Begin by focusing efforts and available resources on implementing solutions that will eliminate high-priority accessibility barriers, based on the severity of non-compliance, proximity to pedestrian attractors, and public input. Lower-priority barriers will be addressed as additional funding becomes available, ensuring that the most critical issues are addressed first while maintaining a plan to resolve the identified barriers over time.
2. The City's ADA/504 Coordinator will work with department heads and budget staff over the next several years to determine the placement of projects through private developments, the **City's Annual Road Program**, and the **Annual Trip Hazard Removal Program**, to be addressed on a fiscal-year basis.
3. The City will also continue to seek alternative funding mechanisms, such as the Community Development Block Grant (CDBG) Program, the Surface Transportation Program (STP), and the Illinois Transportation Enhancement Program (ITEP), and will monitor other grant opportunities to fund improvements.
4. Document current and ongoing ADA remediation efforts to track and monitor the City's progress toward ADA compliance.
5. Continue updating the City's ADA Transition Plan once the building facility evaluations are finished, and as projects are carried out and requests or grievances are received.
6. Identify the most effective way to keep gathering 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: Facility Maps

Public Rights-of-Way Sidewalk Corridors

Appendix D: Project Implementation and Prioritization Tool

Public Rights-of-Way Sidewalk Corridors

Unsignalized Intersections