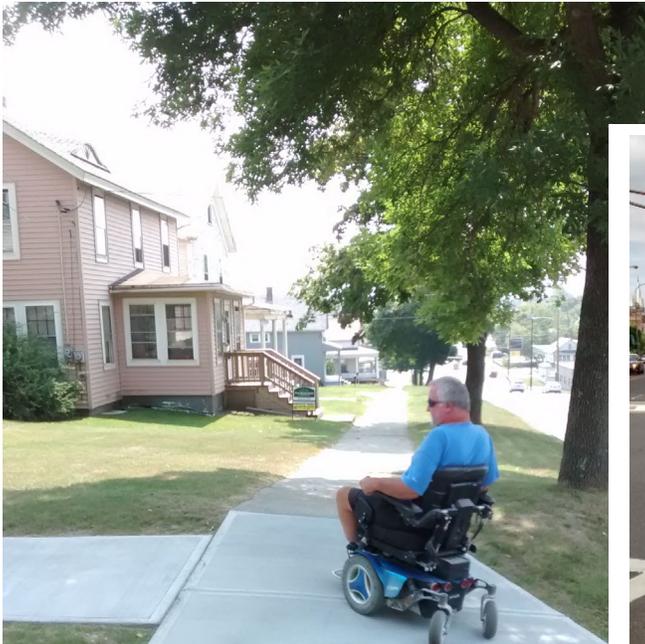




VT Agency of Transportation

# ADA TRANSITION PLAN UPDATE 2020



April 2020 DRAFT

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*Agency of Transportation*

The Vermont Agency of Transportation (VTrans), as a direct recipient of federal transportation funding, is responsible for ensuring compliance with ADA standards as they relate to the provision of transportation services, activities, and programs. In addition, VTrans remains committed to ensuring meaningful access and full participation by persons with disabilities, while seeking to remove remaining barriers to fair and dignified inclusion for people with disabilities.

VTrans does not discriminate on the basis of disability in admission to its programs, services, or activities, in access to them, in treatment of individuals with disabilities, or in any aspect of its operations. VTrans also does not discriminate on the basis of disability in its hiring or employment practices.

VTrans has established a formal grievance procedure where persons with disabilities can identify accessibility concerns that they may have and the Agency will respond to these concerns in a timely, communicative, and, if preferred, confidential process.

I represent VTrans in leading the effort to transitioning Vermont to be accessible to all. My commitment to these efforts will be carried out throughout the organization and progress will be reported accordingly and submitted with the periodic ADA Transition Plan update.

  
\_\_\_\_\_  
Joe Flynn, Secretary  
Agency of Transportation

02/04/2020  
Date

Vermont Agency of Transportation  
ADA Transition Plan Update  
2020

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## 1. Introduction/Background

### Scope of this Plan

The scope of this ADA Transition Plan for the Vermont Agency of Transportation (VTrans) is to assess all VTrans facilities and services used by the public. This includes public buildings such as airport terminals and VTrans offices and public facilities used by pedestrians such as sidewalks and pedestrian signals. The overall intent of the plan is to: 1) inventory all of these facilities and services; 2) identify any barriers to accessibility; 3) provide a schedule and method for addressing any barriers; and 4) ensure that the public is aware of this plan and has the opportunity to provide input.

VTrans completed and published its first ADA Transition Plan in May of 1995. The original plan included a comprehensive inventory of VTrans facilities, including a process for self-evaluation concerning the accessibility of those facilities. The intended purpose of the development and implementation of an ADA Transition Plan is the evaluation of existing facilities for accessibility, the identification of needed upgrades for improvement, and the subsequent development of a plan and scheduled timeframe for making the identified accessibility improvements. The original plan identified those public facilities requiring ADA upgrades, the cost of each improvement, and a timeline for the completion of each improvement. The VTrans properties and facilities inventoried and identified in 1995 as needing ADA improvements as a result of the initial self-evaluation process, and subsequently listed in the original transition plan, have been upgraded.

This plan was last updated in 2014. The purpose of this Transition Plan update is to identify the accessibility improvements completed since the last Transition Plan update in 2014, resolve accessibility deficiencies as they arise and ensure compliance with current standards or guidelines, establish a plan for addressing these issues, conduct a public involvement process to gather input, and establish a clear process for receiving any accessibility complaints.

VTrans takes accessibility of its facilities seriously and strives to continuously improve in this area. In addition to the official letter of responsibility from VTrans Secretary Joe Flynn, the Agency has the [VTrans ADA Notice of Nondiscrimination](#) posted on its Office of Civil Rights web page.

## 2. Framework and Regulations for ADA Compliance

### A. ADA Program Administration

VTrans' ADA Program is administered by the Civil Rights Office. The role of the Civil Rights Office is to monitor the administration of programs to ensure compliance under Vermont and federal laws within VTrans' contracting practices, programs and activities. This division is dedicated to upholding and enforcing all state and federal statutes prohibiting discriminations of persons based on race, color, religion, sex, national origin, age, disability, pregnancy, sexual orientation, genetic information or gender identity or expression.

### B. Official Responsible for Implementing the Transition Plan

The Secretary of the Vermont Agency of Transportation is responsible for the implementation of this Plan.

#### Joe Flynn, Secretary

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**C. Designation of an ADA Coordinator**

The role of the ADA Coordinator is to manage all programs and policies related to compliance with the Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act of 1973, Title II, Title VI, and other federal and state laws associated with regulations for persons with disabilities. The ADA Coordinator acts as the primary contact for all complaints relative of possible discrimination against people with disabilities.

The ADA Coordinator will address complaints, investigate formal grievances, and track the overall progress of the implementation of the Transition Plan. In addition, the ADA Coordinator will coordinate a multidisciplinary approach to implement and manage VTrans' ADA compliance effort. This effort includes developing policies and procedures for VTrans. In addition, the VTrans Bicycle and Pedestrian Program Manager is instrumental in providing technical support related to accessibility for facilities planning, design and construction efforts.

The VTrans ADA Coordinator is responsible for coordinating the efforts of the Vermont Agency of Transportation in complying with ADA responsibilities. The ADA Coordinator is responsible for tracking the Plan's implementation and updates, responding to grievances, ensuring policies and procedures are current, responding to requests for accessible materials or auxiliary aids and services, and conducting or arranging ADA training for VTrans.

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**D. Role of Federal Highway Administration**

The Federal Highway Administration has provided guidance to state Departments of Transportation on development of Transition Plans that meet the requirements of the Americans with Disabilities Act. Most of the regulations that guide the content of Transition Plans are in Title 28 of the Code of Federal Regulations (CFR).

**E. Regulations that Guide ADA Compliance**

<b>Implementing Regulation</b>	<b>Responsibilities</b>
<b>28 CFR 35.105</b>	<p>Self-Evaluation</p> <ul style="list-style-type: none"> <li>• Evaluate current services, policies and practices and make any revisions necessary to meet ADA requirements</li> <li>• Provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities to participate in the self-evaluation process by submitting comments</li> <li>• Maintain a list of interested persons consulted, a description of areas examined and any problems identified, and a description of any revisions made</li> </ul>
<b>28 CFR 35.106</b>	<p>Notice</p> <ul style="list-style-type: none"> <li>• Make ADA information available to the public regarding applicability to ADOT&amp;PF services, programs and activities</li> </ul>
<b>28 CFR 35.107</b>	<p>Responsible Employee/Grievance Procedures</p> <ul style="list-style-type: none"> <li>• Designate a responsible employee to coordinate ADA efforts – provide the ADA coordinator’s name, office address and telephone number</li> <li>• Adopt and publish grievance procedures providing for prompt and equitable resolution of complaints</li> </ul>
<b>28 CFR 35.130; 28 CFR 35.149</b>	<p>General Prohibitions Against Discrimination</p> <ul style="list-style-type: none"> <li>• Do not exclude people with disabilities from participation in or deny benefits of ADOT&amp;PF services, programs or activities</li> <li>• Do not discriminate on the basis of disability</li> </ul>
<b>28 CFR 35.133</b>	<p>Maintenance</p> <ul style="list-style-type: none"> <li>• Maintain facilities and equipment required to be accessible to persons with disabilities in operable working conditions</li> </ul>
<b>28 CFR 35.150</b>	<p>Existing Facilities</p> <ul style="list-style-type: none"> <li>• Operate each service, program or activity in a manner accessible to and useable by individuals with disabilities</li> <li>• Alter existing facilities or construct new facilities as necessary to comply with ADA requirements</li> <li>• Develop a transition plan outlining steps necessary to complete structural changes to facilities</li> </ul>
<b>28 CFR 35.151</b>	<p>New Construction and Alterations</p> <ul style="list-style-type: none"> <li>• Design, construct and alter public facilities in a manner readily accessible to and useable by persons with disabilities, unless structurally impracticable</li> <li>• Provide curb ramps or other sloped areas at any intersection having curbs or other barriers to entry from a street level pedestrian walkway</li> </ul>
<b>28 CFR 35.160; 28 CFR 35.161</b>	<p>Communications/Telecommunications</p> <ul style="list-style-type: none"> <li>• Ensure effective communications with disabled persons</li> <li>• Provide appropriate auxiliary aids and services to afford disabled individuals an equal opportunity to participate in and enjoy the benefits of ADOT&amp;PF services, programs and activities</li> </ul>
<b>28 CFR 35.163</b>	<p>Information and Signage</p> <ul style="list-style-type: none"> <li>• Provide information about the existence and location of accessible services, activities and facilities</li> </ul>

### 3. Standards for Accessibility of VTrans Facilities

Since the completion of the original VTrans Transition Plan, the [U.S. Access Board](#) has made significant progress towards adopting standards for pedestrian facilities in the broader context of what is referred to as the “Public Rights of Way” (PROW). An advisory committee – the Public Rights-of-Way Access Advisory Committee (PROWAAC) – published a final report entitled, “Building a True Community,” in January 2001. Subsequent to that report, the Access Board released draft guidelines based on the Committee's initial 2001 report, in 2002. More recently, in 2011, the Board issued [Proposed Guidelines for Pedestrian Facilities in the Public Right-of-Way Accessibility Guidelines](#) (PROWAG).

In addition, the U.S. Access Board has issued standards to achieve accessibility of shared use paths, recreation facilities, buildings and sites and public transportation facilities.

When assessing existing building facilities for accessibility and when designing new facilities or alterations, the Agency uses the [2010 Department of Justice ADA Standards](#).

Although PROWAG has not undergone final rulemaking, FHWA issued a [memorandum](#) in 2006 indicating that public agencies should use the latest guidance issued by the Access Board when designing and constructing new facilities for pedestrians. VTrans has been using PROWAG as the standard for accessibility of facilities in the public right of way since the issuance of that FHWA memorandum.

VTrans has updated a number of standard drawings and construction specifications since the development of PROWAG. As a result, VTrans projects designed and constructed after 2006 have adhered to the most current and applicable standards for accessibility.

#### **A. Standard Drawings**

VTrans utilizes standard drawings to provide engineering details of sidewalks and curb ramps to ensure consistent design application and construction of accessible pedestrian features. The standard drawings are one element of project contract plans put out to bid prior to the commencement of site construction. VTrans has four primary standard drawings that address elements of accessibility. Drawings C-3A and C-3B detail a number of different configurations of curb ramps, median islands and active rail crossings. Drawings C-2A and C-2B detail sidewalk crossings of driveways and how to maintain accessibility.

#### **B. APS and VTrans Standard Specifications**

When the 2005 Revised Draft guidance was issued by the Access Board, VTrans was in the process of updating its standard specifications for construction. As a proactive measure, the VTrans construction specifications were amended to require Accessible Pedestrian Signals (APS) and pedestrian pushbutton assembly design consistent with the 2005 revised draft guidance. As a result, any pedestrian signal projects that have gone out to bid and been completed since the 2006 VTrans ‘Standard Specifications for Construction’ were adopted have included APS upgrades such as pushbuttons with integrated locator tones, vibro-tactile features, and audible information indicating the ‘Walk’ phase of the signal. These design specifications have been retained in the subsequent VTrans 2011 and 2018 Standard Specifications for Construction.

VTrans provides periodic technical assistance on the elements of accessibility for sidewalks. In 2015 and 2018, VTrans conducted training for municipalities on designing for accessibility. Additionally, in 2018, a training was provided to the VTrans Pavement Design section and engineering consultants who regularly design plans for that group. Paving projects are one of the main ways that curb ramps are

updated along the network of state numbered highways. Training on Transition Plans was provided in 2018 to the Regional Planning Commission staff and also the Transportation Advisory Committee of the Chittenden County Regional Planning Commission.

## 4. The Self-Evaluation Process

### A. General Background – Jurisdiction and Responsibility

For each of the facilities covered by this plan update, a self-evaluation process has been employed or will be conducted to assess accessibility. The self-evaluation method focuses on the present condition, physical features, and barriers to accessibility of existing facilities. Because VTrans has engineering standards and specifications in place that are based on PROWAG, new pedestrian facilities are designed and constructed in compliance with the most current standards and specifications for accessibility.

Sidewalks on the system of highways under state jurisdiction are constructed and maintained to eliminate potential barriers by following the standards in PROWAG. Sidewalks and curb ramps are sometimes included in a roadway reconstruction or bridge project. VTrans paving projects address curb ramps that are within project limits, but do not address connecting segments of sidewalk as those are generally under municipal responsibility, even though they are within the state highway right of way.

Municipalities seeking sidewalks within the state right of way may obtain a permit from VTrans to construct and maintain those sidewalks. Finally, Vermont has what are known as Class I Town Highways. Class I Town Highways are portions of state-numbered routes upon which municipalities accept general maintenance and operational responsibilities, including the provision of sidewalks and curb ramps. While there is a degree of joint responsibility concerning Class I Town Highways, the towns retain the primary responsibility and jurisdiction over those highways. VTrans does program projects to maintain pavement on Class I Town Highways and curb ramps are addressed within those project limits.

Historically, when VTrans constructed sidewalks and curb ramps as part of a larger transportation project, there was often no clear maintenance agreement between the state and the municipality concerning ongoing maintenance of newly constructed pedestrian facilities. However, the current practice surrounding future maintenance of newly constructed sidewalks within a town or municipality includes the drafting of a maintenance agreement specifically outlining the town's responsibilities. The VTrans Administrative Policy – *Sidewalks, Construction and Maintenance - 6010*, effective on July 6, 2001, requires the identification of future maintenance responsibility for any new sidewalks constructed.

In general, VTrans does not own or maintain any sidewalks, even though there are sidewalks within State Highway Right of Way. Those sidewalks are generally there through either a permit (VT State Statute Title 19 section 1111) or under a maintenance agreement with VTrans. Towns are responsible for the ongoing upkeep and maintenance (including winter maintenance) of sidewalk networks.

Sidewalks or other pedestrian facilities designed and constructed in municipalities throughout Vermont prior to the implementation of VTrans Administrative Policy - 6010 may lack clear maintenance agreements between the local entity and VTrans.

## **B. Winter Maintenance**

For a sidewalk or other pedestrian facility to be accessible, it must be effectively maintained. During the winter season, maintenance includes the removal of snow and ice from pedestrian facilities. As stated in a Federal Highway Administration (FHWA) memo dated September 12, 2006, regarding accessibility: “As part of maintenance operations, public agencies' standards and practices must ensure that the day-to-day operations keep the path of travel open and usable for persons with disabilities, throughout the year. This includes snow and debris removal.” Legal adjudications from various jurisdictions have clearly established the requirement that the removal of snow and clearing of sidewalks within a “reasonable amount of time” must occur. What remains less clear, however, is determining what constitutes a reasonable amount of time in which pedestrian facilities are to be cleared and maintained after a significant snow or ice event. VTrans does not maintain any sidewalks in state highway right of way. Most sidewalks have clear agreements identifying the municipality responsible for maintenance, but some sidewalk segments lack a clear maintenance plan.

## **C. Locally Managed Projects**

VTrans oversees the development of locally-managed projects through its [Municipal Assistance Bureau](#) (MAB). Most of the MAB projects are federally funded through the Transportation Alternatives program and other Surface Transportation Program funding. The majority of projects in the MAB program are those that are managed by a local project sponsor, most typically a municipality, with VTrans staff working alongside them to ensure that all federal requirements are met. A mutually beneficial outcome of cooperative and collaborative project monitoring and oversight ensures that projects designed to provide improved access to pedestrian facilities incorporate all elements of accessible facility planning, design, construction, and future maintenance.

# 5. Transition Plan Facilities – Inventory of Barriers and Schedule of Improvements

## **Asset Management**

In the new VTrans prioritization process known as VPSP2 (VTrans Project Selection and Prioritization Process), one of the asset categories is “walkways/paths and trails.” Elements of the rubric by which assets are evaluated address accessibility. Specifically, it is addressed in the “mobility and connectivity” criterion and in the “health access” criterion.

VTrans is in the process of developing an asset management information system called VAMIS. There are several VTrans assets that are envisioned to be tracked in this system and accessibility features can be tracked. This would include pedestrian signals, Park and Ride lots, and curb ramps. VAMIS has an implementation period of approximately two years before it is populated and up and running.

## **Budgeting for Accessibility Improvements**

VTrans does not budget or program projects to specifically address accessibility improvements. For the following list of VTrans assets that affect accessibility, those elements that can result in improvements are typically part of a larger project. For example, if a Park and Ride lot is being rehabilitated, the project will include the appropriate number of accessible parking spaces and ensure that there are accessible routes provided to transit shelters. This project will show up in the VTrans budget as a Park and Ride project. It will not be identified as an accessibility improvement even though it may result in better conditions for people with disabilities.

## **A. Rest Areas/Welcome Centers**

VTrans owns the Rest Areas and Welcome Centers in Vermont, and we have a Memorandum of Understanding with the VT Department of Buildings and General Services (BGS) for operations and maintenance. BGS is responsible for the buildings and sidewalks. VTrans maintains paving, lighting, signs, drainage and guardrail.

As part of the original 1995 VTrans ADA Transition Plan, all of the Rest Areas and Welcome Centers in the state were inventoried and assessed through the self-evaluation process and considered in terms of accessible features, programs, and services. Noted deficiencies were identified, a schedule for improvement developed, and the deficiencies identified were corrected.

BGS took the lead on a project to build the Southbound I-91 Hartford Rest Area project in 2012. That project was built to the most current ADA standards for accessibility. Rest Areas and Welcome Centers are monitored regularly and when any accessibility issues come up, an action plan is developed to address them. This happened in 2019 when several individuals tripped at the Williston Rest Area. An assessment was made of the sidewalks near the entrance and a project was put in place to correct this. Accessibility improvements were incorporated into that project.

In 2011, the idea of using Federal funds for preventative maintenance projects at state-owned Rest Areas was first discussed. A proposal to use Federal transportation funding at state-owned Rest Areas was approved by FHWA in October 2013. Federal and state funding was put in the rest area budget to cover eligible preventative maintenance projects. Items that may utilize this funding include sidewalks/walkways and some building elements such as flooring, doors, etc. Aside from the VTrans-funded preventative maintenance projects, VTrans also participates in any new or refurbished Rest Areas that have been identified in the Rest Area program. In addition, BGS has a major maintenance plan that identifies needs and schedules improvements utilizing their state funds.

VTrans, in collaboration BGS, the Agency of Commerce and Community Development (ACCD), and other stakeholders will conduct a study of Vermont's network of Visitor Centers to develop recommendations for strategic future investments. The study will research, assess and develop a plan for the future of the state's Visitor Centers. This study is anticipated to begin 2020 and be completed in 2021.

There is also a scoping study being undertaken to perform an ADA assessment of the Derby Welcome Center to determine what is needed to bring it into compliance. The outcome of the study will determine the next step – rehabilitation or reconstruction. This study is anticipated to be complete in early 2021.

## **B. Airports**

The Vermont Agency of Transportation's aviation mission is to support, maintain and enhance all state-owned airports. It is worth noting that the Burlington International Airport, where the majority of public flights are serviced, is not a state-owned asset. It is owned and operated by the City of Burlington. The following table summarizes accessibility improvements made or scheduled for the ten state-owned airports.

Airport Name - Location	Accessibility Status	Date Improvements Completed	Comments
Bennington	The main terminal and restrooms are ADA accessible.	2005 - 2006	
Knapp Airport - Berlin	Terminal renovations have been completed as part of a larger runway and taxiway improvement project. Both the terminal and restrooms are ADA accessible.	2011	
Caledonia	The terminal has been completely renovated and is now ADA accessible.	2012	
Franklin County	The main terminal building has received a complete renovation, however, the main door to the terminal has some accessibility issues.	2015	**
Island Pond	No facilities; grass landing strip.		
Middlebury	The terminal has been renovated and is now ADA accessible.	2003	
Morrisville/Stowe	The terminal building and restrooms are fully accessible.		
Newport	A new, 10,000-square-foot terminal building was scheduled for construction beginning in 2014, but that project was delayed. Although a more thorough assessment of the building is needed, there are elements of the restrooms and entrance that don't fully comply with accessibility standards.		**
Rutland	The terminal and restrooms are accessible and the second floor is serviced by an accessible elevator.		
Springfield	Accessibility improvements have been completed in the terminal building and restrooms.	2005-2006	

\*\* By the end of 2022, a more thorough accessibility assessment will be made of this facility with a goal of developing an approximate cost to address any deficiencies. Once that information is available, a schedule and budget will be developed to address needed improvements.

### C. District Offices

The eight VTrans Maintenance District offices were evaluated for accessibility, scheduled for improvements, and updated as indicated in the original VTrans ADA Transition Plan. In the years since, accessibility improvements continue to be made as some district offices have relocated to newer, more accessible, facilities. While these offices are primarily used by VTrans employees, they are occasionally accessed by the public for events like pre-construction meetings and trainings.

While it is the case that not all district offices are fully compliant with the ADA, many improvements have been made and VTrans is committed to making the necessary improvements as previously identified and will continue to ensure that access to its services are made fully available to all.

VTrans plans to complete an updated survey of District facilities accessed by the public by January 1, 2022 and to complete any needed improvements by January 1, 2023.

#### D. Railroads

The VTrans Rail Program assists in the development of opportunities for the shippers and receivers of rail freight in the state and is also responsible for the Amtrak/Vermont Intercity Passenger Rail partnership provided on the Ethan Allen Express and Vermonter lines, respectfully. For passenger rail service, VTrans is a partner with Amtrak and the municipalities in which Amtrak stops are located.

From an accessibility standpoint, VTrans is directly responsible for very few of the facilities at Amtrak stops. All station platforms are currently low level to accommodate the combined freight/passenger trains. The platforms have a portable lift that the train conductors use to accommodate passengers to and from the train.

##### Amtrak Vermonter

Station Name	Station	Platform	Parking	Comments
Brattleboro	Town-owned building; Amtrak is working on ADA compliance in 2021.	Low-level platform	Public parking	Not owned by VTrans.
Bellows Falls	Private ADA-compliant station	Low-level platform	Public parking	Not owned by VTrans.
Windsor	Private	Low-level platform	Private/public parking	Not owned by VTrans; (Amtrak is working on a project to bring platform and parking into ADA compliance in 2020.)
White River Jct.	Owned by Vtrans;in the process of becoming ADA compliant.	Low-level platform	State-owned ADA-compliant parking	2020/2021 project is addressing accessibility improvements.
Randolph	None at this stop	Low-level platform	Public parking	Not owned by VTrans.
Montpelier	Private ADA-compliant station	Low-level platform	Private ADA parking at this location	Not owned by VTrans.
Waterbury	Private ADA-compliant station	Low-level platform	Public and private ADA parking	Not owned by VTrans.
Essex Jct.	Private ADA-compliant station	Low-level platform	Public parking at this location	Not owned by VTrans.
St. Albans	Private ADA-compliant station	Low-level platform	Private ADA-compliant parking	Not owned by VTrans.

VTrans is in the process of expanding the Ethan Allen line north to Burlington. Currently, the only operating stops on the Ethan Allen line are Castleton and Rutland. All of the potential stops are listed in the table below.

##### Amtrak Ethan Allen Express

Station Name	Station	Platform	Parking	Comments
Castleton	Privately owned; ADA compliant	Low-level platform	Private ADA-compliant parking	Not owned by VTrans.
Rutland	City-owned; ADA compliant	Low-level platform	Public parking	Not owned by VTrans.
Middlebury	No station at this stop	Low-level platform	Parking provided by City	Passenger service expected in 2021.

Station Name	Station	Platform	Parking	Comments
Vergennes	Owned by VTrans	Low-level platform	Parking provided by VTrans-owned Park and Ride at this site. See Park and Rides for accessibility.	2019/2020 construction project. Fully accessible when complete.
Charlotte	Owned by VTrans	Low-level platform	ADA-compliant parking	No passenger service at this time.
Shelburne	Owned by VTrans	Low-level platform	ADA-compliant parking	No passenger Service at this time.
Burlington	Owned by VTrans	Low-level platform	Public parking only at this location	Passenger service expected in 2021. 2020/2021 project will make platform ADA compliant.

While many of the stations are unstaffed, Amtrak personnel provide assistance to those with disabilities to both board and disembark, upon arrival and departure, at each station along the Vermonter and Ethan Allen Express routes.

#### **E. Central Garage**

Central Garage Accessibility improvements identified in the original Transition Plan in 1994 and slated for completion in 1995, have been made at the Central Garage in Berlin. Those improvements included restroom renovations and upgrades with the installation of grab bars, new door closers and hardware, wider door clearances and openings.

#### **F. VTrans Offices**

Following a fire in 2018 at the National Life building in Montpelier, where most of VTrans staff were located, a general reassessment was made of space needs for several state agencies. Most of VTrans central office staff are now located at Barre City Place, which is in the heart of Barre City's downtown, on Main Street. Barre City Place was constructed in 2014, was re-inspected for ADA accessibility in 2020, and is considered to meet all accessibility requirements. Barre City Place is owned by DEW Properties, LLC and leased to the State of Vermont.

The remainder of VTrans central office staff are located at the Dill Building, across from Knapp Airport in Berlin. In October 2012, the VTrans Materials Lab and all related facilities were relocated from the former location along Route 302 in Berlin to a new location at the Dill building near the Knapp State Airport in Berlin. The Dill Building is owned by Metro Development, LLC and leased to the State of Vermont. It was re-inspected for ADA accessibility in 2020 and is considered to meet all accessibility requirements.

VTrans has its own training center (VTTC) which is located on Route 302 in Berlin and is fully ADA compliant. The building was brought up to code when it was renovated after the VTrans Materials Lab flooded in 2011. As a training center, it is accessed by VTrans employees and the general public on a weekly, if not daily, basis.

#### **G. Curb Ramps**

The 1995 Transition Plan included a list of 60 sidewalk curb ramps on the state system, a schedule for inspection and cost estimates for project upgrades, and a timeline by which projects were to be

completed. The original list of curb ramps identified for needed improvement in order to become ADA compliant was completed shortly after publication of the 1995 Transition Plan.

As the Agency constructed new curb ramps between 1995 and the present, they were designed to meet the ADA standards in place at the time. An area of accessibility guidance in flux between 1995 and 2001 was the inclusion of the requirement that a detectable feature improve accessibility for those with visual impairments navigating curb ramps. In May 2002, FHWA issued a memorandum clarifying the requirement of truncated domes as the only acceptable detectable warning for installation on curb ramps. The result was that a number of otherwise compliant curb ramps were constructed between 1995 and 2002 without the required truncated domes. As the inventory of curb ramps within the state right of way have been improved and altered over time, those ramps previously constructed without truncated domes have been brought into ADA compliance as required.

In 2005, VTrans utilized its existing video inventory to identify the location of all curb ramps on the state system. In addition to the location, each ramp was analyzed to determine if it contained the required detectable warnings. The reason this particular ADA feature was catalogued was to ensure that the geometric requirements of the ADA were being met and also to identify at what locations the required detectable warnings were not present.

In 2009, VTrans designed and implemented a project, utilizing Federal stimulus funds, to reassess prior upgrades made to all curb ramps on the state system and to ensure that previous improvements complied with ADA design standards. The 2005 inventory was used as a starting point to identify the ramp locations. Field visits to all curb ramp sites ensured comprehensive inventory review and site inspection. Upon site inspection, some sites were removed from the inventory citing prior upgrades, while others were added as visual identification of compliance-related issues, most notably the absence of detectable warnings, was noted. When that project was completed in 2010, all curb ramps on the state system had been identified, scheduled for necessary improvements, and/or were compliant with the current ADA curb ramp regulations.

It is standard practice on all VTrans projects that any new curb ramp installations within the right of way and the limits of the project comply with the most current ADA standards. Paving projects that go beyond simple maintenance are considered alterations within the right of way, and therefore must meet accessibility standards consistent with the court ruling in the Kinney v. Jerusalem case. Based on an analysis of bid quantities of detectable warning surface and sidewalk on paving projects, VTrans installs between 300 and 600 curb ramps a year, bringing them into compliance with accessibility standards.

However, there is not a comprehensive, up-to-date inventory of all curb ramps on the state system and whether they meet ADA standards. One of the identified actions in this update of the Transition Plan is to complete such an inventory by the end of 2021. In addition, a process will be developed so that when new ramps are installed within a state highway right of way by either a developer or municipality, the location of those ramps is added to the inventory. All such sidewalks are installed under a section 1111 highway access permit and the permitting section ensures that new curb ramps comply with PROWAG.

#### **H. Pedestrian Signals**

VTrans is responsible for 164 traffic signals across the state. Of those, 55 include pedestrian equipment of some type. VTrans maintains a database of all signals under its jurisdiction. The data indicates the number of signals that include a pedestrian phase (either concurrent or exclusive) and at

what locations Accessible Pedestrian Signal (APS) upgrades have been installed. The VTrans Traffic Design section estimates that the cost of upgrading a standard signal system providing pedestrian access to all four corners of an intersection with an improved system, including eight APS pushbuttons, is approximately \$12,000. As new signals are constructed or existing signals are upgraded as part of improvement or alteration projects, APS pushbutton systems are installed.

The VTrans Traffic Signal Engineer estimates that pedestrian features have an approximate life cycle of 10 - 15 years. VTrans constructs two or three new signals a year and new or rehabilitated signals are fully compliant with accessibility requirements. Stand-alone signal projects are implemented by the Highway Safety and Design Section and some signal upgrades are incorporated into pavement management projects.

Additionally, if VTrans receives a request from a municipality to convert an existing pedestrian signal to APS, the Agency works collaboratively with local entities to make the necessary improvements to enhance accessibility.

The pedestrian signal database is updated as new signals go online or as existing signals are upgraded and improved. This database will be a valuable tool to assess progress towards making all signals under VTrans jurisdiction fully accessible to persons with disabilities.

Providing audible and vibro-tactile information at pedestrian pushbuttons is one element of accessibility. PROWAG and the MUTCD contain information about pushbutton locations to ensure they can be reached by those using wheelchairs or other mobility devices. The current database of VTrans pedestrian signals does not include an assessment of these aspects. It is anticipated that in 2020 and 2021, the Traffic Signal Section, in partnership with the Bicycle and Pedestrian Program, will hire a temporary employee(s) to visit and inventory all VTrans pedestrian signals and populate a database of all accessibility features. This database will be an inventory of any barriers to accessibility. Once that information is known, VTrans will be able to budget and schedule projects to address those barriers.

Once the inventory has been completed, an evaluation can be made of how many pedestrian signals require modifications to fully comply with accessibility requirements. This information can be used to develop a schedule to make these changes.

**I. Rail Trails**

VTrans owns four former rail lines that now function as multi-use trails. The four rail trails are:

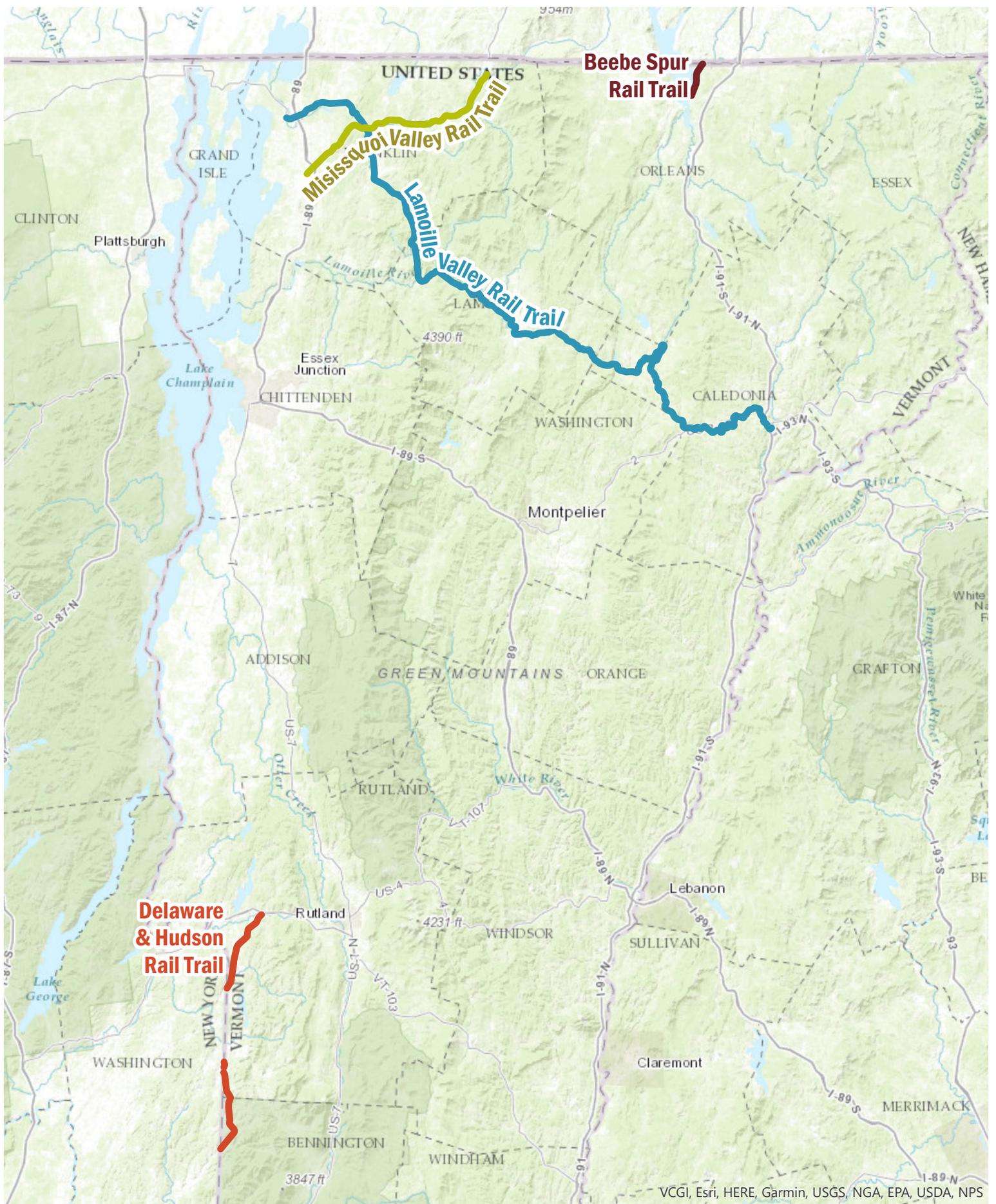
Trail Name	From	To	Length	Notes
Missisquoi Valley Rail Trail	St. Albans	Richford	26.3 miles	VTrans maintains; also has a citizen council.
Beebe Spur	Newport	Derby	3.8 miles	VTrans maintains.
Lamoille Valley Rail Trail	Swanton	St. Johnsbury	89 miles	Leased to VAST to develop and maintain.
Delaware and Hudson – North Section	Castleton	Poultney	9.5 miles	VT Dept. of Forests, Parks and Rec. is responsible for regular maintenance.

Trail Name	From	To	Length	Notes
Delaware and Hudson – south section	Pawlet	Rupert	9.5 miles	VT Dept. of Forests, Parks and Rec. is responsible for regular maintenance.

All of the rail trails have aggregate trail surfaces that comply with the accessibility requirement to be smooth, stable, and slip resistant. Over time, VTrans has programmed and completed projects that have installed detectable warning surfaces at all locations where the trails intersect with roadways.

The Lamoille Valley Rail Trail is not fully built out at this time. As VAST and municipalities through which the trail runs develop projects, VTrans is reviewing project plans and ensuring that the design is compliant with accessibility requirements. Therefore, it is anticipated that all rail trails in Vermont are accessible.

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## **J. ADA Accessibility During Construction**

An area where VTrans continues to develop and deliver guidance is pedestrian accessibility through construction zones, especially on projects where existing sidewalks become inaccessible prior to, and during, actual construction activity. There is guidance in the *Manual on Uniform Traffic Control Devices* or *MUTCD* about pedestrian accessibility during construction. Additionally, FHWA has published some general guidance on this topic. VTrans has a Work Zone Safety & Mobility Guidance Document published in August 2007 that includes a goal of providing a “safe work zone for motorists, pedestrians, bicyclists (the travelling public) and construction personnel.” To meet this goal, it identifies a strategy of developing “site specific traffic control plans, while ensuring compliance with the *Manual on Uniform Traffic Control Devices*.”

VTrans has developed standard construction notes regarding pedestrian access in work zones that are regularly incorporated in project plans and construction specifications. VTrans adopted the *Vermont Bicycle and Pedestrian Work Zone Traffic Control Guide* in July 2018. This guide includes details on how to provide accessible routes for pedestrians when existing sidewalks are impacted by construction.

## **K. Park-and-Ride Lots**

In addition to a variety of maintenance facilities and other properties, VTrans has 32 state-owned and maintained Park-and-Ride facilities. As VTrans has upgraded and expanded these facilities, VTrans has adhered to the existing ADA accessibility regulations and requirements. However, there may be some elements of existing Park-and-Ride facilities that may require further improvement to ensure compliance with the newly adopted 2010 Standards.

As facilities are expanded and improved, VTrans will ensure accessibility of the state-owned Park-and-Ride facilities. In 2013, VTrans undertook the following actions:

1. Developed an ADA Compliance Evaluation survey for all of the state-owned and maintained Park-and-Ride Facilities.
2. Conducted site visits to each Park-and-Ride and evaluated using the survey.
3. Using information from the evaluation survey, compiled a list of changes needed at each site.
4. Developed a plan for addressing the ADA compliance issues for each Park-and-Ride facility identified as needing any changes. Some of these changes have already been implemented, and the balance are being addressed based on available funding, time schedules, methods of treatments, priorities, and any ongoing maintenance that is needed.

In the Park and Ride compliance table that follows, several Park and Rides are planned for reconstruction projects and those have a construction year noted. For all the other ADA improvements identified as short term, there are no projects currently programmed. However, it is anticipated that these needs will be addressed in one of two ways with a completion year between 2023 and 2025. One possibility is that if an existing Park and Ride Lot needs to be re-paved, the ADA improvements will be part of the paving project. Another possibility for lots with good pavement is that a statewide project will be developed to address all of the other lots with “short term” improvements identified.

**VTRANS PARK - AND - RIDE COMPLIANCE RECOMMENDATIONS (2020)**

	Park & Ride Location	Identified Work Items	Timeline	Comments
1	Barre Town (East)	Line striping (including removal of existing)	Short-term	Mark accessible spaces, aisles, symbols
		Accessible signs/symbols	Short-term	One space
		Light replacement	Short-term	One luminaire
2	Barre Town (South)	Accessible signs/symbols	Short-term	Install 'Van Accessible' sign
3	Berlin (VT62)	Expanded facility in development (2021 Construction)	Short-term	Expanded facility to include new ADA compliant sidewalk, bus shelter, line striping, signage, lighting, EV charging
4	Bradford (1-91)	N/A	N/A	New facility completed in 2016 w/new ADA compliant sidewalk, striping, signage, bus shelter, EV stations, and lighting
5	Bradford (VT-25)	Updated ADA information needed	Short-term	Dirt lot with no lights or formal line striping.
6	Cambridge	Upgraded facility to be constructed 2020	Short-term	Upgrades to facility include new lighting, striping, signage, bus shelter, EV charging
7	Clarendon	Updated ADA information needed		
8	Colchester (Exit 17)	Line striping (including removal of existing)	Short-term	Mark accessible spaces, aisles, symbols
9	Colchester (Exit 16)	N/A	N/A	New facility completed in 2018 with new ADA-compliant sidewalk, striping, signage, bus shelter, EV stations, and lighting
10	Enosburg	Updated ADA information needed		
11	Georgia	Line striping (including removal of existing)	Short-term	Mark accessible spaces, aisles, symbols
		Accessible signs/symbols	Short-term	Two sets of signs, including van accessible
12	Hartland	N/A	N/A	New facility completed in 2014 with new ADA-compliant sidewalk, striping, signage, bus shelter, EV stations, and lighting
13	Manchester	Improved facility in development (2023 Construction)	Short-term	Improved facility to include new ADA-compliant sidewalk, bus shelter, line striping, signage, lighting, EV charging
14	Middlesex	Line striping (including removal of existing)	Short-term	Two spaces
		Accessible signs/symbols	Short-term	Two signs
		Transit system info sign	Short-term	
15	Montpelier	Line striping (including removal of existing)	Short-term	Three spaces
		Accessible signs/symbols	Short-term	Three signs
		Transit system info sign	Short-term	
16	Morrisville-Stowe	Line striping (including removal of existing)	Short-term	Two spaces
		Accessible signs/symbols	Short-term	
		Transit system info sign	Short-term	

PRIORITY LEVEL
Highest
High
Medium
Low

**VTRANS PARK - AND - RIDE COMPLIANCE RECOMMENDATIONS (2020)**

	Park & Ride Location	Identified Work Items	Timeline	Comments
17	Putney	N/A	N/A	New facility completed in 2016 w/ new ADA compliant sidewalk, striping, signage, bus shelter, EV stations, and lighting
18	Randolph	N/A	N/A	Improved facility completed in 2018
19	Richmond	Updated ADA information needed		
20	Royalton (Exit 3)	New facility to be constructed in 2020	N/A	New facility to include lighting, striping, signage, bus shelter, EV charging
21	Royalton (VT14)	Line striping (including removal of existing)	Short-term	Mark accessible spaces, aisles, symbols
		Accessible signs/symbols	Short-term	One set of signs, including van accessible
22	Sharon	Line striping (including removal of existing)	Short-term	Mark accessible spaces, aisles, symbols
		Accessible signs/symbols	Short-term	One set of signs, including van accessible
23	Springfield	N/A	N/A	Improved facility completed in 2015 with new ADA-compliant sidewalk, striping, signage, bus shelter, EV stations, and lighting
24	Saint Albans	Line striping (including removal of existing)	Short-term	Mark accessible spaces, aisles, symbols
		Accessible signs/symbols	Short-term	
		Transit system info sign	Short-term	
25	Saint Johnsbury	Expanded facility to complete construction in 2020	Short-term	Upgrades to facility include additional parking, new lighting, striping, signage, bus shelter, EV charging
26	Stockbridge	Updated ADA information needed		
27	Thetford	New, expanded facility to be constructed in 2020	short-term	New facility include lighting, striping, signage, bus shelter, EV charging
28	Vergennes-Ferrisburgh	Line striping (including removal of existing)	Short-term	Mark accessible spaces, aisles, symbols
		Accessible signs/symbols	Short-term	
29	Waterbury	Evaluation needed	Short-term	
30	Weathersfield	Transit system info sign	Short-term	
31	West Danville	Line striping (including removal of existing)	Short-term	Mark accessible spaces, aisles, symbols
		Accessible signs/symbols	Short-term	
		Mark and sign 'No Parking' next to shelter	Short-term	
		Relocate transit sign close to shelter	Short-term	
32	Williamstown-Northfield	Expanded facility in development (2022 Construction)	Short-term	Expanded facility to include new ADA-compliant sidewalk, bus shelter, line striping, signage, lighting, EV charging

#### L. **Communications/VTrans Website Accessibility**

The current template used for [vtrans.vermont.gov](http://vtrans.vermont.gov) is ADA and Section 508 compliant. However, since there are over 40 VTrans employees who are Website Administrators and have control over how to manage their site, there are sometimes minor accessibility issues with the content. When these issues come up, Administrators work with the Agency of Digital Services to address them.

In the area of general communication, VTrans routinely offers assistance and alternatives when people with a disability request it. This manifests itself in the provision of translators, providing hard copy materials and access to telephonic translation services and other means of communication to make Agency information available.

### 6. Public Outreach

As part of the ongoing efforts by VTrans to invite public input and help ensure that all of its programs, services, and activities are readily accessible and usable by individuals with disabilities, VTrans has worked closely with disability advocacy groups including the [Vermont Center for Independent Living \(VCIL\)](#), the [Vermont Association of the Deaf \(VTAD\)](#), and the [Vermont Association for the Blind and Visually Impaired \(VABVI\)](#), to seek feedback on this 2020 ADA Transition Plan Update. Effective public outreach efforts are a significant component of the ongoing activities to identify and reduce existing physical barriers to facility access by persons with disabilities.

A copy of the Draft VTrans ADA Transition Plan was posted on the VTrans Civil Rights web page on April.xx, 2020. A press release about the Transition Plan and how to provide comments was issued on April xx, 2020. The public comment period was open for xx days and VTrans received xx comments.

A summary of the comments received on the plan update can be found in Appendix XX and online at xx.

### 7. ADA Complaint Disposition Process

Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of disability, may file a complaint with the Vermont Agency of Transportation's Office of Civil Rights & Labor Compliance.

All complaints related to disability discrimination should be addressed to Sue Hackney, ADA Coordinator, at the following address:

Sue Hackney  
VTrans Office of Civil Rights and Labor Compliance  
219 North Main Street  
Barre, VT 05641  
[susan.hackney@vermont.gov](mailto:susan.hackney@vermont.gov)

Complaints may also be submitted by telephone or fax. Contact numbers are as follows:

Phone: 802.249.9291  
Fax: 802.479.5506

Electronic submission of complaints is also permitted. All complaints related to disability discrimination should be addressed to Sue Hackney, ADA Coordinator, at the following address: [susan.hackney@vermont.gov](mailto:susan.hackney@vermont.gov).

Written or faxed complaints must be signed by the complainant. Complaints submitted by telephone or e-mail, or unsigned written or faxed complaints must be followed by a complaint in writing, signed by the complainant or his/her representative within 10 business days of the initial verbal/electronic/unsigned complaint. If the complainant requires assistance to submit a written document, a member of the VTrans Office of Civil Rights will interview the complainant and assist the person in converting verbal complaints to writing. This document must be signed by the complainant or his/her representative. Federal and state law require that the complaint be filed within 180 days of the alleged incident of discrimination.

Once the complaint has been submitted in writing, VTrans will pursue the following steps in addressing the complaint:

1. The VTrans ADA Coordinator will initiate a Complaint Form.
2. Essential information on the form includes the following:
  - a. Date of the incident that is the subject of the complaint;
  - b. Time of the incident;
  - c. Location of the incident; and
  - d. Circumstances of the incident in as much detail as is available, including description of the issues and the names and job titles of those individuals perceived as parties in the complaint.
3. The completed form, along with the initial complaint letter and a summary of any other communication, will be submitted to the VTrans Chief of Civil Rights for review. The Chief of Civil Rights will determine the jurisdiction and acceptability of the complaint and any need for additional information. After any additional information is procured, the Chief of Civil Rights will determine whether to accept or reject the complaint.
4. The complainant will be provided with a written notification that VTrans has either accepted or rejected the complaint.
5. A complaint may be rejected for the following reasons:
  - a. More than 180 days passed between the alleged incident and the filing of the initial complaint.
  - b. The allegation does not involve a disability.
  - c. The allegation does not involve VTrans or one of its sub recipients of federal funds.
  - d. The complainant fails to respond to repeated requests for additional information needed to process the complaint.
  - e. The complainant cannot be located after reasonable attempts.
6. An accepted complaint will be assigned a case number and be logged in a database and on the VTrans ADA Complaint Log maintained by the VTrans Office of Civil Rights, identifying the complainant's name, date of the incident, and information about the alleged incident.
7. The VTrans ADA Coordinator, assisted by other members of the Office of Civil Rights who are trained in compliance investigations, will initiate an investigation of the complaint and complete a report within 90 days of the acceptance of the complaint. The report shall include a narrative description of the incident, identification of the persons interviewed, findings, and recommendations for disposition.

8. The report will be reviewed by the Chief of the VTrans Office of Civil Rights and referred to the Legal Section of VTrans, if deemed appropriate. The Chief will accept or reject the recommendation for disposition, in consultation with the Legal Officer, and if the individuals involved are found to be in noncompliance with ADA requirements, remedial actions will be determined.
9. The results of the investigation and the Chief's determination will be mailed to the complainant. Notice shall include information regarding appeal rights of the complainant and instructions for initiating such an appeal. Notice of appeals are as follows:
  - a. VTrans will reconsider the determination if new facts come to light.
  - b. If the complainant is dissatisfied with the determination and/or resolution set forth by VTrans, the same complaint may be submitted to the appropriate federal agency listed below:

Federal Transit Administration (FTA)  
Office of Civil Rights  
1200 New Jersey, S.E. 5<sup>th</sup> Floor  
TRC East Building  
Washington, DC 20590  
Phone: 202.366.4043

Federal Highway Administration (FHWA)  
Vermont Division  
87 State Street, Suite 216  
Montpelier, VT 05602  
802.828.4423

10. A copy of the complaint and VTrans' investigation report, letter of finding, and remedial action plan will be submitted to FTA within 120 days of the initial receipt of the complaint.

# APPENDICES

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**APPENDIX B - ADA COMPLAINT FORM**

Discrimination based on Disability



**Office of Civil Rights & Labor Compliance**

**Section I**

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone (Cell/Home): \_\_\_\_\_ Telephone (Work): \_\_\_\_\_

Email: \_\_\_\_\_

Accessible Format Requirements? Large Print \_\_\_\_\_ Audio Tape \_\_\_\_\_ TDD \_\_\_\_\_

Other (Explain) \_\_\_\_\_

**Section II**

Are you filing this complaint on your own behalf? Yes\* \_\_\_\_\_ No \_\_\_\_\_ *\*If you answered "Yes" to this question, go to Section III. If you answered "No," please provide the following information:*

Name of person for whom you are filing: \_\_\_\_\_ Relationship: \_\_\_\_\_

Please explain why you are filing this complaint for a third party: \_\_\_\_\_

If you are filing on behalf of someone else, have you have obtained that person's permission to file this complaint? Yes \_\_\_\_\_ No \_\_\_\_\_

**Section III**

I believe the discrimination I experienced was based on my disability.

Date of Alleged Discrimination: \_\_\_\_\_

Explain as clearly as possible what happened and why you believe you were discriminated against. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If you need more space, please attach a separate sheet of paper.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Section IV**

Have you previously filed an ADA complaint with this agency? Yes \_\_\_\_\_ No \_\_\_\_\_

**Section V**

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?  
Yes\* \_\_\_\_\_ No \_\_\_\_\_

*\*If you answered "Yes," check all that apply:*

Federal Agency \_\_\_\_\_ Federal Court \_\_\_\_\_ State Agency \_\_\_\_\_ State Court \_\_\_\_\_ Local Agency \_\_\_\_\_

Please provide information for the contact person at the agency/court where you filed the complaint.

Name: \_\_\_\_\_ Title: \_\_\_\_\_

Agency: \_\_\_\_\_ Agency Telephone: \_\_\_\_\_

Agency Address: \_\_\_\_\_

**Section VI**

Name of agency complaint is against: \_\_\_\_\_

Contact person: \_\_\_\_\_ Title: \_\_\_\_\_

Telephone number: \_\_\_\_\_

You may attach any written materials or other information that you think is relevant to your complaint.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

**Please either submit this form in person to the address below, mail it, or send it via email:**

Sue Hackney  
ADA Coordinator, Office of Civil Rights and Labor Compliance  
Vermont Agency of Transportation  
One National Life Drive  
Montpelier, VT 05633 - 5001

Phone: 802.828.5858  
Email: [susan.hackney@vermont.gov](mailto:susan.hackney@vermont.gov)

## APPENDIX C – LIST OF ACRONYMS

<b>504:</b>	Section 504 of the Rehabilitation Act of 1973 is a national law that protects qualified individuals from discrimination based on their disability. The nondiscrimination requirements of the law apply to employers and organizations that receive financial assistance from any Federal department or agency. Section 504 forbids organizations and employers from excluding or denying individuals with disabilities an equal opportunity to receive program benefits and services. It defines the rights of individuals with disabilities to participate in, and have access to, program benefits and services.
<b>ADA:</b>	Americans with Disabilities Act
<b>ADAAG:</b>	Americans with Disabilities Act Accessibility Guidelines
<b>APS:</b>	Accessible Pedestrian Signal
<b>ANSI:</b>	American National Standards Institute
<b>AASHTO:</b>	American Association of State Highway and Transportation Officials
<b>DEM:</b>	Design and Engineering Manual
<b>DOJ:</b>	Department of Justice
<b>DPW:</b>	Department of Public Works
<b>FHWA:</b>	Federal Highway Administration
<b>GIS:</b>	Geographic Information System
<b>GPS:</b>	Global Positioning System
<b>MEF:</b>	Maximum Extent Feasible
<b>MUTCD:</b>	Manual of Uniform Traffic Control Devices for Streets and Highways
<b>PAR:</b>	Pedestrian Access Route
<b>PPSA:</b>	Policy, Planning and Sustainability Administration
<b>PSRA:</b>	Public Space Regulatory Administration
<b>QA:</b>	Quality Assurance
<b>QC:</b>	Quality Control
<b>QA/QC:</b>	Quality Assurance/Quality Control
<b>PROWAG:</b>	Public Rights-of-Way Accessibility Guidelines
<b>ROW:</b>	Right-of-Way
<b>RPC:</b>	Regional Planning Commission
<b>SHA:</b>	State Highway Administration
<b>TOA:</b>	Transportation Operations Administration

**TCP:** Traffic Control Plan  
**UFA:** Urban Forestry Administration  
**UFAS:** Uniform Federal Accessibility Standards  
**VTrans:** Vermont Agency of Transportation

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