



STATE OF DELAWARE
STATE COUNCIL FOR PERSONS WITH DISABILITIES
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MEMORANDUM

DATE: February 12, 2015
TO: Joint Finance Committee
FROM: Jamie Wolfe on behalf of SCPD and DDC
RE: Accessible Transportation System

Good Afternoon. My name is Jamie Wolfe and I am presenting these remarks as Vice-Chairperson of the State Council for Persons with Disabilities (SCPD) and Public Policy Manager of the Developmental Disabilities Council (DDC). The councils believe that a truly accessible transportation system, including viable, accessible and affordable transportation options for people with disabilities, will only occur when DelDOT and the Delaware Transit Corporation (DTC) make a commitment both philosophically and financially to mandates, programs, policies and plans which already exist and assist in meeting such an endeavor. We have the following observations.

First, Executive Order 6, signed by Governor Markell on April 24, 2009, requires DelDOT to create a Complete Streets Policy that will promote safe access for all users along and across the streets of Delaware. Consistent with the attached *Request for Policy Implement* effective January 6, 2010, Section IV requires the following:

“Planning, in coordination, with each applicable division, will be responsible for developing a Complete Streets Implementation Plan for DelDOT programs and projects. The implementation plan will have specific actions for each division, and be designed in a consistent and compatible format. The implementation plan should be adopted within twelve months of the effective date of this policy and include an annual review process.”

SCPD requested the Complete Streets Implementation Plan which complies with Section IV of the *Request for Policy Implement* and Executive Order 6 in February 2014 (see attached letter). DelDOT's response in March of that year (attached) only said it had “developed a draft Complete Streets Implementation Plan, but the review committee has required more refinements, so the Plan has not been approved yet by our management team. We do not believe the current draft is worthy of distribution to your Council at this time.” To date, SCPD has not received the final plan. While DelDOT provided some rationale to defend its lack of compliance, Councils believe

it is unacceptable that the mandates of a Governor's Executive Order do not appear to have been met almost 6 years after it was signed.

Second, DelDOT, CLASI and the USDOJ voluntarily entered into a letter of Agreement regarding the installation of curb ramps at intersections on state-maintained roads throughout Delaware on July 16, 2004 (see attached Agreement) which required submittal of reports. Section 12 of the Agreement states the following:

“In addition, annually, and not later than March 1 each year, DelDOT agrees to issue a report to the Project Director of the Disabilities Law Program, of CLASI, one copy to Chairman of the State Council for Persons with Disabilities.....”

SCPD has never received a copy of such a report and respectfully requested (in Feb. 2014 in the same letter referenced above) any past reports that comply with the Agreement. DelDOT's response, in part, was as follows: “DelDOT has not been able to locate the required annual reports for the timeframe covered in the Agreement; therefore, I assume the reports were not created.” DelDOT did note though that it believed that it had met or exceeded the obligation to install curb ramps as required by the Agreement and provided some statistics to defend that position. However, DelDOT's ADA Self-Assessment and Transition Plan (pages attached) references the Agreement at page 24 and states that “DelDOT agreed to spend at least \$150,000 per year to fund the installation of curb ramps at intersections around the state.....”. “Due to changes in personnel, we do not currently have comprehensive documentation regarding remediation status of each location and must review project files to determine whether all identified locations have been addressed”. This is another unacceptable DelDOT response that occurred 10 years after the Agreement was signed.

Third, the above referenced DelDOT ADA Self-Assessment and Transition Plan was released in May 2014. The Transition Plan portion was essentially developed to “lay out the actions that will be taken to render the State's facilities, services, programs and activities accessible to all individuals”. (attached at pg. 8). An evaluation of 520 miles of state-owned sidewalk revealed that “77% of associated curb ramps do not meet current standards.” (attached at p. 25). Appendix F (attached) states that in Kent County, 82% of Bus Stop Patron Pads were non-compliant, while 72% in New Castle County, and 75% in Sussex, were non-compliant. Councils believe little consideration has been given to developing the accessibility of a complete transit system in the close to 25 years since the enactment of the ADA. Very little evidence currently exists that DelDOT is addressing this shortcoming in a dedicated, immediate and systematic way. Indeed, the Transition Plan states “DelDOT is proposing to provide the financial support for the implementation of the ADA Title II Transition Plan by including the actions necessary.....”. To help achieve this goal, the proposed Fiscal Year 2015 Capital Transportation Program (CTP) includes \$3 million specifically to fund the stand-alone remediation projects.” (attached at pgs. 30-31). However, the actual CTP (attached) reveals that only \$300,000 was included in the budget for such projects in FY 15.....a whopping 90% cut. In addition, only a total of 4.3 million dollars is projected for FYs 15 – 20 which is really not much more than the \$ 3 million originally allotted for FY 15 alone. This is a significant shortfall in funding given the projected

cost of the entire Transition Plan at 257 million dollars (see attached) . The Transition Plan and the funding to support it are critical in helping with the “connectivity” aspect of a truly accessible transportation system – for example what good are accessible bus stops if a person cannot get there because the sidewalks and curb ramps are not accessible or ADA compliant. In addition, failure to comply with the appropriate follow through required by the ADA Transition Plan may put federal transportation funding in jeopardy.

In summary, SCPD recommends that DelDOT and the Delaware Transit Corporation (DTC) genuinely listen to the meaningful input we provide, and commit both ethically and financially to mandates, programs, policies and plans which already exist. What good are mandates, sound policies and plans when they are ignored by everyone responsible for implementing them? Given DelDOT's aforementioned lack of compliance with mandates and policies, SCPD and DDC are somewhat suspect about the Department's current and future transit initiatives and plans. However, the councils continue to look toward the future and appreciate the recent collaboration with Secretary Bhatt and DTC regarding its Transit Redesign which now includes a more comprehensive plan. In addition, we welcome Secretary Cohen as Cabinet Secretary and appreciate her past receptiveness to our issues and needs. We certainly look forward to working with her in rectifying current problematic issues and focusing on the future to build a transportation system, with affordable and available options, that is truly accessible to everyone.

Thank you for your consideration and the opportunity to present today.



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February 7, 2014

Mr. Shailen Bhatt, Cabinet Secretary
Delaware Department of Transportation
800 Bay Road
Dover, DE 19901

RE: Complete Streets Policy and USDOJ Agreement

Dear Secretary Bhatt:

I write on behalf of the State Council for Persons with Disabilities (SCPD) regarding the Delaware Department of Transportation's (DelDOT's) Complete Streets Policy and the Department's "Agreement" with the United States Department of Justice (USDOJ) and Community Legal Aid Society, Inc. (CLASI) executed on July 16, 2004.

First, Executive Order 6, signed by Governor Markell on April 24, 2009, requires DelDOT to create a Complete Streets Policy that will promote safe access for all users along and across the streets of Delaware. Consistent with the attached *Request for Policy Implement* effective January 6, 2010, Section IV requires the following:

"Planning, in coordination, with each applicable division, will be responsible for developing a Complete Streets Implementation Plan for DelDOT programs and projects. The implementation plan will have specific actions for each division, and be designed in a consistent and compatible format. The implementation plan should be adopted within twelve months of the effective date of this policy and include an annual review process."

SCPD respectfully requests the Complete Streets Implementation Plan which complies with Section IV of the *Request for Policy Implement* and Executive Order 6.

Second, DelDOT, CLASI and the USDOJ voluntarily entered into a letter of Agreement regarding the installation of curb ramps at intersections on state-maintained roads throughout Delaware on July 16, 2004 (see attached Agreement). Section 12 of the Agreement states the following:

"In addition, annually, and not later than March 1 each year, DelDOT agrees to issue a report to the Project Director of the Disabilities Law Program, of CLASI, one copy to Chairman of the State Council for Persons with Disabilities....."

REQUEST FOR
POLICY IMPLEMENT

STATE OF DELAWARE

DEPARTMENT OF TRANSPORTATION

P.I. NUMBER: O-6

Complete Streets Policy

References:	Executive Order Number 6	Issued:	12/07/2009
	Proposed Complete Street Act of 2009	Revised:	N/A
		Effective:	01/06/2010
		Primary Responsibility:	Director: Transportation Solution

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I. Purpose

To ensure that the Delaware Department of Transportation (DelDOT) system modifications are routinely planned, designed, constructed, operated and maintained in a way that enables safe and efficient access for all users. The result should be a system for all users that is comprehensive, integrated, connected, safe, and efficient allowing users to choose among different transportation modes, both motorized and non-motorized.

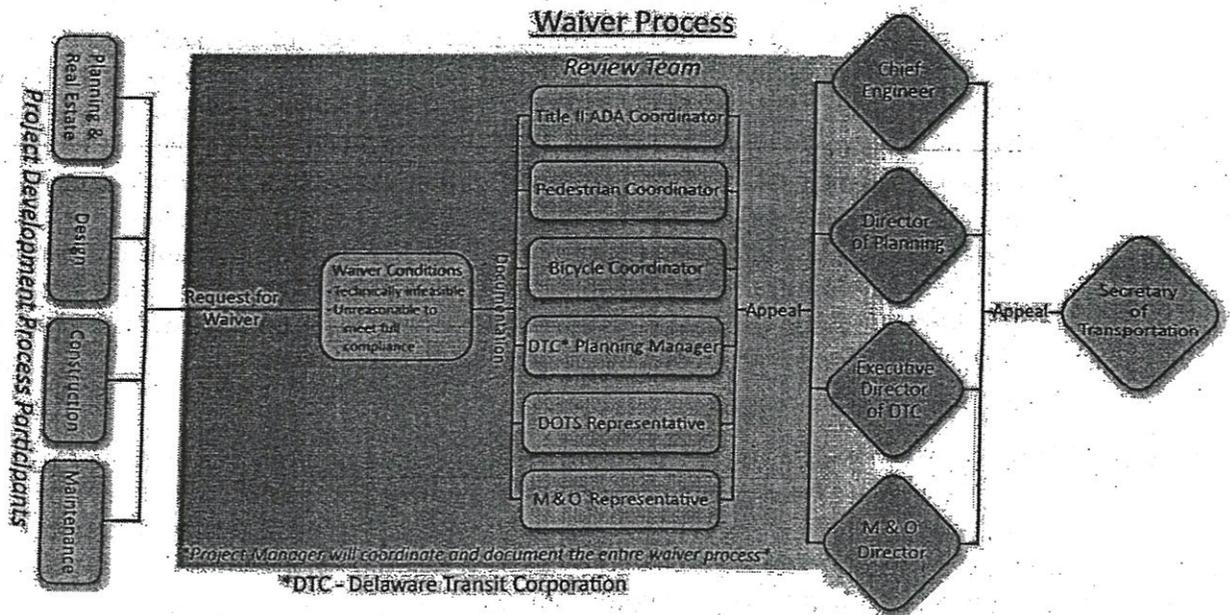
V. Exemptions

Justification and documentation exists for a roadway project to be exempt from the requirements of this policy based upon one of the following circumstances:

1. Alteration and maintenance projects on an affected roadway that prohibits by law use of the roadway by specific users. (Example I-95). New construction would be exempt for facilities within the right-of-way.
2. If it is determined that a reasonable and equivalent alternative already exists for certain users or is programmed in the CTP/TIP as a separate project as determined by representatives of appropriate modes. (Example: transit planner representing bus service identifies project for new bus stop already programmed).
3. Ordinary maintenance activities designed to keep transportation facilities in serviceable condition that does not interfere with existing facilities for longer than the time needed to perform maintenance.
4. As of the effective date of this policy, projects that have been submitted by the applicant as Semi-Final or more advanced plans are exempt.

VI. Waivers

It is recognized, in a built environment, that complexities and challenges exists and there is a need to avoid or mitigate impacts to natural and cultural resources. There may also be right-of-way and financial constraints associated with individual projects. In an effort to reconcile these constraints, DelDOT will include a waiver process, with appropriate time constraints, in each division implementation plan. The general waiver process concept is shown in the diagram below:



VIII. Effective Date

This policy shall become effective 30 day(s) after signature by the Secretary, or, if applicable, upon compliance with the regulatory process required by the Administrative Procedures Act (29 Del.C. Ch. 101).

U.S. ___, 123 S. Ct. 2639 (2003); Kinney v. Yerusalim, 9 F.3d 1067 (3d Cir. 1993), cert. denied, 511 U.S. 1033 (1994).

4. CLASI and USDOJ accept the assurances of DeIDOT that DeIDOT included, and continues to include, the installation of required accessible curb ramps in all new pavement resurfacing and Community Transportation Needs (CTN) (formerly known as Suburban Street Fund) projects prospectively beginning in 2001 and thereafter. The parties also agree that DeIDOT retrofitted all previous projects commenced in the years 1998-2000 with curb ramps, in order to make them accessible where required.

5. In addition, CLASI and USDOJ accept the assurances of DeIDOT that since 1992 DeIDOT has installed curb ramps as required under the ADA for all Paving and Rehabilitation Projects with 3" or more of top material removed, and for all large re-paving projects funded with a combination of state and federal dollars. Except under limited circumstances, in addition to the retrofitting described in the paragraph 4 of this Agreement, however, DeIDOT did not install curb ramps for resurfacing projects where less than 3" top material was removed, or on suburban residential streets projects, as called for under ADA regulation, 28 C.F.R. 35.151(e)(1-2)¹, at the locations where such curb ramps should have been so installed. The number of curb ramps in Delaware that remain to be retrofitted to comply with the ADA, based on the repaving work done

¹ Section 35.151 of the Code of Federal Regulations, Title 28 states the following:

“(e) Curb ramps

(1) Newly constructed or altered streets, roads, and highways must contain curb ramps or other sloped areas at any intersection having curbs or other barriers to entry from a street level pedestrian walkway.

(2) Newly constructed or altered street level pedestrian walkways must contain curb ramps or other sloped areas at intersections to streets, roads, or highways.” 28 C.F.R. § 35.151(e)(1 and 2).

<u>Original Construction Season Compliance Year</u>	<u>Retrofit Schedule Year</u>
1997	2005
1996	2006
1995	2007
1994	2008
1993	2009
1992	2010

If any remaining curb ramps have not been retrofitted by the year 2010, upon completion of the above schedule, DeIDOT will begin this review cycle again, starting with Compliance Year 1997, until all non-conforming sites have been retrofitted.²

9. ~~In addition, in June of each Review Year, DeIDOT will post non-conforming ramp locations proposed to be retrofitted for the upcoming construction season on the DeIDOT website, <http://www.deldot.net>, over and above the ramp locations to be retrofitted under the regular resurfacing and reconstruction programs.~~ DeIDOT will collaborate with the State Council for Persons with Disabilities and its own advisory council, EDTAC, in order to publicize this process and to facilitate public input into the prioritization of sites. In determining which sites have a higher priority, DeIDOT agrees to review the public comments, and consider those comments when scheduling sites for retrofitting for that year. CLASI and USDOJ agree that DeIDOT shall have the ability to adjust the above schedule to include sites they deem appropriate due to public comment in any particular year, as long as adjustments do not alter the overall pace of remedial retrofitting outlined in paragraph 8.

² As further discussed in this Agreement, this formula may be amended dependent upon the public comment period, at the discretion of the State of Delaware, when public comments require retrofitting out of sequence for a particular intersection(s), as long as adjustments do not alter the overall pace of remedial retrofitting outlined in paragraph 8.

Program, of CLASI, one copy to Chairman of the State Council for Persons with Disabilities, in care of the Delaware Division of Administrative Services, Delaware Department of State. The report would provide the following information: (1) The number and location of curbs retrofitted for the prior year; and (2) a synopsis of the public comments received.

13. In entering into this Agreement, the State of Delaware does not admit that the Delaware Department of Transportation, its employees, or any entity on its behalf has violated any legal requirement of the Americans with Disabilities Act, including but not limited to any alleged violations of the curb ramp regulation, 28 C.F.R. 35.151(e)(1-2), but that this Agreement is entered into voluntarily in settlement of disputed claims. Except as provided in paragraph 12 of the Agreement, the Department of Transportation expressly reserves any and all defenses it may be entitled to assert in any subsequent litigation relating the Americans with Disabilities Act, notwithstanding the representations and commitments outlined in this Agreement, none of which may be used against the State of Delaware, its agencies and/or employees in any such proceeding.

Executed on this 16th day of ~~June~~^{July}, 2004.

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APR 3 2014

STATE OF DELAWARE
DEPARTMENT OF TRANSPORTATION
800 BAY ROAD
P.O. BOX 778
DOVER, DELAWARE 19903

SHAILEN P. BHATT
SECRETARY

March 19, 2014

Daniese McMullin-Powell, Chairperson
State Council for Persons with Disabilities
410 Federal Street, Suite 1
Dover, Delaware 19901

Dear Ms. McMullin-Powell:

The purpose of this letter is to respond to your request for information relating to DelDOT's Complete Streets Policy and the USDOJ Agreement, contained within your letter received on February 12, 2014.

As you noted in your letter, DelDOT developed and implemented a Complete Streets Policy, which was effective in January 2010, in response to Governor Markell's Executive Order 6; this policy was attached to your letter. We have developed a draft Complete Streets Implementation Plan, but the review committee has required more refinements, so the Plan has not been approved yet by our management team. We do not believe the current draft is worthy of distribution to your Council at this time. We do believe that the information and direction provided by the Complete Streets Policy is sufficiently specific and capable of standing on its own while the Implementation Plan is being completed. The Complete Streets Implementation Plan is intended to provide the DelDOT personnel that are responsible for project development and design with a more application oriented understanding of what is expected in order to enhance their efficiency and effectiveness. However, the Implementation Plan does not replace guidance that already exists in documents such as the DelDOT Design Manual, MUTCD, and ADAAG.

Regarding the letter of Agreement between DelDOT, CLASI, and the USDOJ, regretfully, DelDOT has not been able to locate the required annual reports for the timeframe covered in the Agreement; therefore, I assume the reports were not created. However, we believe that we met or exceeded the obligation to install compliant curb ramps as required by the Agreement. We report the number of curb ramp reconstructions to ADA standards in our annual Operating Budget Narrative, and the following table pulled directly from past budgets



demonstrates our commitment to remediation of a minimum of 100 curb ramps annually, as required by the agreement.

Curb Ramps Reconstructed to ADA Standards by Year

FY07	424
FY08	582
FY09	500
FY10	839
FY11	159
FY12	700
FY13	980

DelDOT is committed to fulfilling the federal requirements associated with ADA Title II/Section 504 and, in demonstration of that commitment, established the ADA Title II/Section 504 Coordinator as the first step toward ensuring ADA compliance and communication of status of compliance. As you know, John McNeal serves as our ADA Title II/Section 504 Coordinator. In this role, he is expected to coordinate with your organization annually regarding DelDOT's ADA remediation efforts. John has worked with others to develop DelDOT's ADA Self-Assessment and Transition Plan, and we appreciate the comments received from groups such as yours relating to the draft Plan. In response to the public comments we received, John is in the process of updating the ADA Transition Plan with more specific information. Among the specific actions will be DelDOT's commitment to provide an annual update showing ADA features graphically, designating non-compliant and remediated areas, along with a summary of remediation activities for the year. In 2011, DelDOT conducted a full inventory and evaluation of all sidewalks for which we are responsible, noting adherence to ADA requirements. The features noted as non-compliant in that sidewalk inventory will be revisited this year, and the resulting inventory will serve as our baseline for the ADA Transition Plan annual reports. Prior to issuing the first annual report, DelDOT will publish a map showing non-compliant pedestrian features on the ADA Website, for public review; this map also will note remediation accomplished since the 2011 inventory.

I understand and appreciate your Council's involvement with our efforts to improve mobility for persons with disabilities throughout the State. Please do not hesitate to reach out to me with questions or concerns.

Sincerely,



Shailen P. Bhatt
Secretary

cc: Ms. Laura Waterland, Disabilities Law Program
Mr. John McNeal, DelDOT ADA Title II/Section 504 Coordinator
Developmental Disabilities Council
Governor's Advisory Council for Exceptional Citizens

Staffing

The Federal government has provided some guidance regarding their view of the appropriate staffing for addressing ADA compliance in the document titled 2009 ADA Transition Plans: A Guide to Best Management Practices, NCHRP Project Number 20-7 (232). This document states that:

“Many of the staff members in these positions (of ADA Coordinator) have backgrounds that do not match the technical requirements that are needed to successfully complete the activities required to comply with ADA. This presents a roadblock for the agencies at the outset of the process and can lead to delays in compliance

“Providing dedicated, trained staff within the Department for ADA compliance has a high correlation with successful drafting and implementation of Transition Plans, Self-evaluations, and Transition Plan updates”

DelDOT has a full time ADA Title II Coordinator whose background is fully suited “to successfully completing the activities required to comply with the ADA”. In addition DelDOT has assigned staff to support the ADA Title II Coordinator to ensure that design plans and construction activities are ADA compliant.

Funding

Since 1999, all new projects are funded to include the components and features needed for ADA compliance in accordance with our Road Design Standards and, since 2010, our Complete Streets Policy. Beginning in 1999, as the result of an agreement with the United States Department of Justice, DelDOT agreed to spend at least one hundred fifty thousand dollars (\$150,000) per year to fund the installation of curb ramps at intersections around the State that should have been included in projects the Department completed between 1992 to 1997 but were not. Due to changes in personnel, we do not currently have comprehensive documentation regarding the remediation status of each location and must review project files to determine whether all identified locations have been addressed. In addition, the Complete Streets Policy currently in effect requires that improvements or modifications are included in all new projects and in repaving, repair, and signalization projects in order to bring the ADA portion of the transportation system into compliance with current ADA standards.

Self-Evaluation Summary

DelDOT is aware of the requirements of ADA and alert to and empathetic with the needs of the persons for whom this law provides careful consideration. Having reviewed the current conditions of the facilities, services, programs, and activities for which DelDOT is responsible, DelDOT finds that in general these services, programs, and activities are accessible with some exceptions. What follows below is a conclusive summary assessment or evaluation of where DelDOT complies with ADA standards and where DelDOT needs further work in order to comply. This more conclusive summary is presented under the same categories as the section above.

Buildings

Numerous building improvements have been made over the past ten years. Although DeIDOT has not reported systematically on progress or accomplishments, DeIDOT has removed known barriers and will remediate any new ones that are identified.

Design Standards and Practices

DeIDOT's design standards are in compliance with current regulation and guidance. As standards change, DeIDOT will reassess and modify published standards as appropriate.

Pedestrian Facilities

* The evaluation of 520 miles of state-owned sidewalk and related traffic signal components was finished in June 2012. About 55% of these sidewalks meet current standards while about 77% of associated curb ramps do not meet current standards. Part of the difficulty in maintaining compliant features has been with changes in standards that have occurred over the past 20 years. A table summarizing the results can be found in **Appendix F**. More detailed information is available through the DeIDOT ADA Title II Coordinator.

Transit System

The transit system, by reason of its Statewide para-transit program, helps DeIDOT provide mobility for people with disabilities. In addition, the busses that provide fixed route service are accessible, so where fixed route service is available, para-transit riders can enjoy the same full schedule flexibility that fixed route riders do provided that their route to the bus stop is accessible. Careful attention needs to be paid to the Pedestrian Access to Bus Stop study that is currently underway in order to maximize the extent to which persons with disabilities can use the fixed route system. The system improvements identified through this study should be included in the work associated with modifying the current system of sidewalks, roads, and signals to meet ADA requirements.

Rest Areas

The Delaware Welcome Center on I-95 is fully accessible. No further work is needed at this time. Some non-compliant components of the travel way into the Smyrna Rest Area have been identified. These will need a more detailed evaluation and quite possibly will require remediation.

Driver and Motor Vehicle Licensing

The Division of Motor Vehicles (DMV), along with other motor vehicle agencies in all the other States, recently received a survey from the National Highway Transportation Safety Administration (NHTSA) through which NHTSA is attempting to ascertain the accessibility of DMV programs and activities. In response to this request, the Wilmington, Dover, and Georgetown locations were reevaluated by an independent

Disabled Transit Advisory Committee (EDTAC) provides advice regarding the transportation programs and services provided under the Delaware Transit Corporation (DTC). Finally, the Architectural Accessibility Board reviews the standards for the design and construction of all state-owned facilities, and facilities constructed or altered with State funds, to ensure that the built environment regarding these facilities is safely accessible to, and usable by, persons with disabilities.

Transition Plan Need and Purpose

The Transition Plan, as required by 28 CFR 35.150 (d), must include at a minimum, the following:

- Identification of the physical barriers that limit accessibility to the public entity's programs, services, or activities for people with disabilities,
- Description of the methods to be used to make the facilities accessible,
- A schedule for making the necessary modifications, including a yearly schedule and,
- The name and contact information for the public official responsible for implementation of the Transition Plan.

* As required by Title II of ADA, 28 CFR. Part 35 Sec. 35.105 and Sec. 35.150, DeIDOT has conducted a self-evaluation of its policies, services, activities, and buildings, and has completed an assessment of its pedestrian facilities. DeIDOT has developed this Transition Plan to lay out the actions that will be taken to render the State's transportation facilities, services, programs, and activities accessible to all individuals.

The purpose of this Transition Plan document is to present the Department's Self-Evaluation and identify the actions DeIDOT will take in order to transition the transportation system in the State of Delaware to be accessible in compliance with the requirements of the Americans with Disabilities Act.

Transition Plan Management

This Transition Plan is intended to be a dynamic document that will be reviewed periodically and updated as needed to keep pace with changes in standards and system conditions. The reviews will occur annually in order to provide the information necessary for documenting progress toward achieving the goal of having a fully accessible system and in order to create the work program for the ensuing year as described further in this document under the heading "Progress Monitoring and Reporting". A formal review and update of the ADA Title II Transition Plan will occur every five years. The implementation of this Transition Plan will continue until all deficiencies, including those associated with pedestrian facilities, are compliant. The program is expected to continue after that for future plans and construction projects, maintenance, etc. To streamline Plan updates and keep the document current and relevant, appendices will be updated annually if new information is available and such information does not alter the intent of the Transition Plan. When an appendix update is

There are no remedial measures that are found to be necessary for DeIDOT Websites at this time. However, any recommendations for modifications that arise as a result of the public information work cited above will be incorporated into the annual ADA work plan.

Project Development and Construction

Remedial actions have been taken to create and adopt a Technical Infeasibility Documentation and Waiver process. The adopted process is included in this document as **Appendix G**. Any modifications adopted through the Public Involvement Policy review cited above will be incorporated into the project development process. In addition, the ADA Title II team will be involved in reviewing plans and in construction inspection in an effort to achieve 100% compliance.

Maintenance

A Sidewalk Maintenance Policy has been developed and adopted by DeIDOT. This policy includes provisions for snow removal, which DeIDOT began to implement during the winter season of 2013-2014. DeIDOT expects to make refinements to this effort as a result of what has been learned through this new initiative.

Policies

With the exception of the Public Information and Involvement Policy cited previously, no additional remedial work is required at this time with regard to DeIDOT policies. The Complete Streets Implementation Plan needs to be adopted to augment the current efforts to create complete and accessible streets.

Staffing

DeIDOT will periodically review the workload for this effort and decide whether additional staff resources are needed, especially in the area of clerical support and construction inspection. In addition, DeIDOT will evaluate alternative methods for keeping the pedestrian system inventory complete and up to date and then will adopt the method it deems to be most cost effective.

Funding

DeIDOT is proposing to provide the financial support for the implementation of the ADA Title II Transition Plan by including the actions necessary to remediate the deficiencies discovered through the Self-Evaluation into the programs and projects that are included in DeIDOT's six year Capital Transportation Program (CTP). Every effort will be made to include all of the needed remedial actions within the limits of each project such that the system is brought to current standards to the extent of maximum feasibility. DeIDOT will strive towards a complete and accessible system and to ensure that the deficiencies identified through the Self-Evaluation have all been remediated. To help achieve this goal, the proposed Fiscal Year 2015 CTP includes \$3 million specifically to fund the

✂ “stand-alone” remediation projects. Similar funding levels are being proposed for subsequent fiscal years. These funds are in addition to the remediation improvements that will be made through projects and programs that are already part of the six year CTP.

Progress Monitoring and Reporting

The ADA Title II / Section 504 Coordinator will be responsible for creating an annual Transition Plan Work Program that covers work items not included in the actions cited in the “Funding” paragraph above and for ensuring that the applicable portion of the Transition Plan Work Program is included in the Department’s budget and work program for each year. This work will include ensuring that the design and construction of transportation system projects are in compliance with ADA standards. In addition, this person will be responsible for creating an annual Transition Plan Progress Report including maps that depict the locations that have been remediated in the past year. These maps will also be available for viewing at the ADA Website via the Internet.

APPENDIX F Pedestrian Facility Evaluation Summary

Statewide Summary

DeIDOT Sidewalk Inventory and ADA Assessment Summary - By County

(Field Data Collection and ADA Assessment of Sidewalks in DeIDOT R/W in Investment Levels 1-4)

County	Category	Total Assessed	Total Compliant	Total Non-Compliant	% Compliant	% Non-Compliant
Kent	Sidewalks (miles)	95.24	60.76	34.48	64%	36%
Kent	Sidewalks (feet)	502876	320771	182105	64%	36%
Kent	Missing Sidewalk Links (miles)	2.61	-	-	-	-
Kent	Missing Sidewalk Links (feet)	13792				
Kent	Marked Crosswalks	693	609	84	88%	12%
Kent	Curb Ramps	2168	559	1609	26%	74%
Kent	Curb Barriers	324	-	-	-	-
Kent	Bus Stop Patron Pads	279	51	228	18%	82%
Kent	Pedestrian Signals	329	165	164	50%	50%
Kent	Medians and Channelized Islands	153	71	82	46%	54%
Kent	Railroad Crossings	41	0	41	0%	100%
Kent	Driveway Crossings Along Non-Compliant Sidewalk	796				
Kent	Stub Ends	376	-	-	-	-
Kent	On-Street Parking Locations	66	-	-	-	-
Kent	Driveway Crossings	1086	386	700	36%	64%
Kent	Pinch Points	149	60	89	40%	60%
Kent	Horizontal Gaps > 1/2 inch	78	-	-	-	-
Kent	Vertical Elevation Differences > 1/2 inch	223	-	-	-	-
Kent	Non-Compliant Sidewalk 20 Feet or Less	280	-	-	-	-
Kent	Path/Trail Berm Running Slope	4	0	4	0%	100%
New Castle	Sidewalks (miles)	327.79	171.18	156.61	52%	48%
New Castle	Sidewalks (feet)	1730753	903863	826890	52%	48%
New Castle	Missing Sidewalk Links (miles)	12	-	-	-	-
New Castle	Missing Sidewalk Links (feet)	64286				
New Castle	Marked Crosswalks	2440	2234	206	92%	8%
New Castle	Curb Ramps	7624	1577	6047	21%	79%
New Castle	Curb Barriers	937	-	-	-	-
New Castle	Bus Stop Patron Pads	1497	417	1080	28%	72%
New Castle	Pedestrian Signals	1827	724	1103	40%	60%
New Castle	Medians and Channelized Islands	656	262	394	40%	60%
New Castle	Railroad Crossings	86	1	85	1%	99%
New Castle	Driveway Crossings Along Non-Compliant Sidewalk	3568				
New Castle	Stub Ends	1013	-	-	-	-
New Castle	On-Street Parking Locations	89	-	-	-	-
New Castle	Driveway Crossings	2415	904	1511	37%	63%

County	Category	Total Assessed	Total Compliant	Total Non-Compliant	% Compliant	% Non-Compliant
New Castle	Pinch Points	477	292	185	61%	39%
New Castle	Horizontal Gaps > 1/2 inch	359	-	-	-	-
New Castle	Vertical Elevation Differences > 1/2 inch	839	-	-	-	-
New Castle	Non-Compliant Sidewalk 20 Feet or Less	799	-	-	-	-
New Castle	Path/Trail Berm Running Slope	31	0	31	0%	100%
Sussex	Sidewalks (miles)	97.10	57.85	39.25	60%	40%
Sussex	Sidewalks (feet)	512675	305405	207270	60%	40%
Sussex	Missing Sidewalk Links (miles)	2.37	-	-	-	-
Sussex	Missing Sidewalk Links (feet)	12492				
Sussex	Marked Crosswalks	642	593	49	92%	8%
Sussex	Curb Ramps	2253	698	1555	31%	69%
Sussex	Curb Barriers	316	-	-	-	-
Sussex	Bus Stop Patron Pads	182	46	136	25%	75%
Sussex	Pedestrian Signals	165	80	85	48%	52%
Sussex	Medians and Channelized Islands	128	74	54	58%	42%
Sussex	Railroad Crossings	48	0	48	0%	100%
Sussex	Driveway Crossings Along Non-Compliant Sidewalk	1391				
Sussex	Stub Ends	407	-	-	-	-
Sussex	On-Street Parking Locations	37	-	-	-	-
Sussex	Driveway Crossings	1126	436	690	39%	61%
Sussex	Pinch Points	157	94	63	60%	40%
Sussex	Horizontal Gaps > 1/2 inch	71				
Sussex	Vertical Elevation Differences > 1/2 inch	188				
Sussex	Non-Compliant Sidewalk 20 Feet or Less	206	-	-	-	-
Sussex	Path/Trail Berm Running Slope	2	1	1	50%	50%



STATE OF DELAWARE
DEPARTMENT OF TRANSPORTATION
800 BAY ROAD
P.O. BOX 778
DOVER, DELAWARE 19803

SHAILEN P. BHATT
SECRETARY

To: Members of the Council on Transportation and All Delaware Residents

I am pleased to enclose the Delaware Department of Transportation's (DeIDOT) Capital Transportation Program (CTP) for Fiscal Years 2014-2019. This program is consistent with DeIDOT's mission to provide a safe, reliable, and convenient option to access the transportation network that offers travelers cost-effective choices for the movement of people and goods.

As part of DeIDOT's efforts to provide information that is easily understood by the residents of Delaware, the program is grouped into four major funding categories:

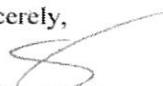
- **Road System** – Improvements to the state's roads and bridges;
- **Grants and Allocations** – Includes the Community Transportation Fund, which is allocated by legislators for various projects in their districts;
- **Transit Systems** – Investments in transit services including buses, maintenance and other facilities, transit shelters, and other assets supporting all modes of operation;
- **Support Systems** – All other investments to the transportation network including facilities, equipment, information systems, etc.

The first four years of DeIDOT's CTP constitute Delaware's State Transportation Improvement Program (STIP). The CTP lists projects and services we are already working on and has been developed with the assistance of the Wilmington Area Planning Council (WILMAPCO), Dover/Kent County Metropolitan Planning Organization and Sussex County. It recognizes the priorities they have set in their respective four-year Transportation Improvement Programs (TIP). In addition, we held public hearings in September to gather public comment and to get a better sense of local and statewide multi-modal priorities.

In June the General Assembly authorized DeIDOT to proceed with the Fiscal Year 2014 elements of the program.

The Department looks forward to working on this exciting program which will improve the transportation system throughout the state. Additional information on the proposal is available on the DeIDOT web site, www.deldot.gov.

Sincerely,


Shailen P. Bhatt
Secretary



FY 2015 - FY 2020

Pedestrian ADA Accessibility

PROJECT AUTHORIZATION SCHEDULE

IN (\$000)

PROJECT NUMBER	PHASE	FUNDING SOURCE	CURRENT ESTIMATE	FY 2015			FY 2016			FY 2017			FY 2018			STATE TOTAL	FEDERAL TOTAL	
				STATE	FEDERAL	FUND TYPE												
	Program Funding	100% STATE	4,330.0	300.0			500.0			500.0				1,000.0			2,300.0	
Total			4,330.0	300.0			500.0			500.0				1,000.0			2,300.0	

PROJECT FUNDING SCHEDULE

IN (\$000)

PROJECT NUMBER	PHASE	FUNDING SOURCE	BALANCE AS OF 3/31/14 (SIDE 0M)	CURRENT ESTIMATE	FY 2015			FY 2016			FY 2017			FY 2018			FY 2019 TOTAL	FY 2020 TOTAL	
					STATE	FEDERAL	OTHER												
	Program Funding	100% STATE		4,330.0	300.0			500.0			500.0				1,000.0			1,000.0	1,000.0
Total				4,330.0	300.0			500.0			500.0				1,000.0			1,000.0	1,000.0

Statewide Summary of Cost to Repair or Replace Non-Compliant Pedestrian Features by Overall Rank and Investment Level

DEI DOT Sidewalk Inventory and ADA Assessment - Phase I, II, and III
Field Data Collection and ADA Assessment of Sidewalks in DEI DOT Right of Way in Investment Levels 1-4

Overall Rank	Investment Level	Curb Barrier*	Curb Ramps - Replace Existing*	Curb Ramps - Repair DW*	Sidewalk*	Non-Compliant Sidewalk 30 Feet or Less	Vertical Fleadles	Horizontal Gaps	Driveway Crossings on Compliant Sidewalk	Driveway Crossings on Non-Compliant Sidewalk	Railroad / PAR Crossing	Pinch Point	Bus Stop Patron Pads	Pedestrian Signal*	Marked Crosswalks	Missing Links 100 Feet or Less	Missing Links Greater Than 100 Feet	Grand Total
Overall Rank	Investment Level 1	\$1,675,100	\$10,184,000										\$995,800			\$38,763	\$155,807	\$31,073,835
	Investment Level 2	\$1,655,100	\$10,183,000										\$465,600			\$38,763	\$155,807	\$31,053,135
	Out-of-Play		\$20,100															\$20,100
	Overall Rank		\$6,909,000	\$6,488,100										\$4,193,300			\$107,285	\$1,570,051
Investment Level 1	Investment Level 1	\$6,870,000	\$6,156,700										\$4,122,600			\$107,285	\$1,270,051	\$21,404,337
	Investment Level 2	\$72,700	\$227,800										\$63,700					\$165,600
	Investment Level 3	\$6,700	\$46,900										\$9,800					\$67,000
	Out-of-Play												\$9,800					\$67,000
Overall Rank	Investment Level 1	\$1,969,800	\$12,719,800		\$970,704				\$1,462,000	\$776,500			\$9,800					\$5,811,204
	Investment Level 2	\$1,781,800	\$12,719,800		\$970,704				\$1,462,000	\$776,500			\$1,793,400			\$60,127	\$333,858	\$5,811,204
	Investment Level 3	\$1,781,800	\$12,719,800		\$970,704				\$1,462,000	\$776,500			\$1,411,200			\$16,478	\$14,772	\$6,296,313
	Out-of-Play		\$1,781,800		\$970,704				\$1,462,000	\$776,500			\$289,100			\$16,493	\$12,085	\$3,312,255
Investment Level 1	Investment Level 1	\$222,800	\$140,700		\$7,259				\$12,200	\$17,200			\$3,800					\$47,956
	Investment Level 2	\$24,800	\$134,500		\$7,259				\$12,200	\$17,200			\$3,800					\$47,956
	Investment Level 3	\$53,600	\$134,500		\$7,259				\$12,200	\$17,200			\$3,800					\$47,956
	Out-of-Play				\$7,259				\$12,200	\$17,200			\$3,800					\$47,956
Overall Rank	Investment Level 1	\$53,600	\$134,500		\$243,620				\$12,200	\$17,200			\$49,000					\$504,810
	Investment Level 2	\$53,600	\$134,500		\$243,620				\$12,200	\$17,200			\$49,000					\$504,810
	Investment Level 3	\$53,600	\$134,500		\$243,620				\$12,200	\$17,200			\$49,000					\$504,810
	Out-of-Play				\$243,620				\$12,200	\$17,200			\$49,000					\$504,810
Overall Rank	Investment Level 1	\$2,137,600	\$2,137,600		\$1,209,313				\$7,000,000	\$11,027,000	\$600,400		\$81,300					\$8,278,833
	Investment Level 2	\$1,698,000	\$1,698,000		\$575,631,513				\$6,709,000	\$9,107,000	\$511,000		\$19,600					\$80,323,433
	Investment Level 3	\$202,500	\$202,500		\$1,004,999				\$44,000	\$1,430,000	\$39,400		\$63,700					\$4,407,499
	Out-of-Play		\$202,500		\$1,004,999				\$44,000	\$1,430,000	\$39,400		\$63,700					\$4,407,499
Overall Rank	Investment Level 1	\$42,178	\$60,330		\$14,178				\$2,000	\$2,000			\$0,178					\$60,178
	Investment Level 2	\$14,702,447	\$105,420		\$14,702,447				\$2,000	\$2,000			\$0,178					\$105,420
	Investment Level 3	\$19,144	\$9,800		\$19,144				\$2,000	\$2,000			\$0,178					\$19,144
	Out-of-Play		\$19,144		\$19,144				\$2,000	\$2,000			\$0,178					\$19,144
Overall Rank	Investment Level 1	\$140,700	\$67,000		\$140,700				\$12,000	\$12,000			\$13,950					\$2,142,270
	Investment Level 2	\$67,000	\$67,000		\$140,700				\$12,000	\$12,000			\$13,950					\$2,142,270
	Investment Level 3	\$67,000	\$67,000		\$140,700				\$12,000	\$12,000			\$13,950					\$2,142,270
	Out-of-Play		\$67,000		\$140,700				\$12,000	\$12,000			\$13,950					\$2,142,270
Overall Rank	Investment Level 1	\$58,000	\$58,000		\$1,813,248				\$150,000	\$150,000	\$29,900		\$29,900					\$1,893,048
	Investment Level 2	\$58,000	\$58,000		\$1,813,248				\$150,000	\$150,000	\$29,900		\$29,900					\$1,893,048
	Investment Level 3	\$58,000	\$58,000		\$1,813,248				\$150,000	\$150,000	\$29,900		\$29,900					\$1,893,048
	Out-of-Play		\$58,000		\$1,813,248				\$150,000	\$150,000	\$29,900		\$29,900					\$1,893,048
Overall Rank	Investment Level 1	\$311,500	\$296,500		\$192,577				\$40,000	\$40,000			\$40,000					\$731,177
	Investment Level 2	\$311,500	\$296,500		\$192,577				\$40,000	\$40,000			\$40,000					\$731,177
	Investment Level 3	\$311,500	\$296,500		\$192,577				\$40,000	\$40,000			\$40,000					\$731,177
	Out-of-Play		\$311,500		\$192,577				\$40,000	\$40,000			\$40,000					\$731,177
Overall Rank	Investment Level 1	\$10,565,000	\$56,239,800		\$99,611,720				\$17,406,000	\$34,510,000	\$2,511,200		\$7,075,600					\$227,046,112
	Investment Level 2	\$10,565,000	\$56,239,800		\$99,611,720				\$17,406,000	\$34,510,000	\$2,511,200		\$7,075,600					\$227,046,112
	Investment Level 3	\$10,565,000	\$56,239,800		\$99,611,720				\$17,406,000	\$34,510,000	\$2,511,200		\$7,075,600					\$227,046,112
	Out-of-Play		\$10,565,000		\$99,611,720				\$17,406,000	\$34,510,000	\$2,511,200		\$7,075,600					\$227,046,112

* The cost of fixing non-compliant medians and channelized islands is covered under curb ramps and sidewalks.

The Overall Rank is the end result of the DEI DOT ADA Prioritization Methodology. The methodology takes into account the reason a pedestrian facility feature is non-compliant; the number of bus stops and public use facilities within a 1/4 mile and between a 1/4 mile and a 1/2 mile; and the relative importance of the pedestrian feature. The Overall Rank can range from 1, the lower priority, to 15, the highest priority.

Investment Level 1 areas are often municipalities, towns, or urban/suburban places in our state. Density is generally higher than in the surrounding areas. There are a variety of transportation opportunities available. Buildings may have mixed uses, such as a business on the first floor and apartments above.

Investment Level 2 areas can be composed of less developed areas within municipalities, rapidly growing areas in the counties that have or will have public water and wastewater services, and utilities, areas that are generally adjacent to or near Investment Level 1 areas, smaller towns and rural villages that should grow consistently with their historic character, and suburban areas with public water, wastewater, and utility services.

Investment Level 3 areas generally fall into two categories. The first category covers lands that are in the long-term growth plans of counties or municipalities where development is not necessary to accommodate expected population growth during this five-year planning period (or longer). The second category includes lands that are adjacent to or intermingled with fast-growing areas within counties or municipalities that are otherwise categorized as Investment Levels 1 or 2. These lands are most often impacted by environmentally sensitive features, agricultural preservation issues, or other infrastructure issues.

Investment Level 4 areas are rural in nature, and are where the bulk of the state's open-space/natural areas and agricultural industry is located.

Out-of-Play areas are areas which are not at all available for development. Out-of-Play areas include publicly owned lands, lands for which a future right-of-way is planned, and lands in slow form of permanent open-space protection.

New Castle County Summary of Core to Repair or Replace Non-Compliant Pedestrian Features by Overall Rank and Investment Level

Final Data Collection and ADA Assessment of Sidewalks in DHCOT Right of Way Investment Level 1-4

Overall Rank	Investment Level	Out-of-Play	Curb Barrier*	Curb Barriers - Repair Chain*	Curb Ramps - Repair DWS*	Sidewalk*	Non-Compliant Sidewalk to Feet or Less	Vertical Elevation	Horizontal Gaps	Diverse Groupings on Compliant Sidewalk	Diverse Groupings on Non-Compliant Sidewalk	Raised / Pk Crossing	Paint Point	Bus Stop Pattern Pads	Pedestrian Signals*	Manhole Covers/Manholes	Missing Links 100 Feet or Less	Missing Links Greater Than 100 Feet	Grand Total
Overall Rank	15		\$1,160,300	\$4,385,400	\$5,375,000	\$20,100													
Investment Level	1	Out-of-Play	\$1,160,300	\$4,385,400	\$5,375,000	\$20,100													
Overall Rank	13		\$4,100,200	\$20,136,600	\$20,100														
Investment Level	1	Out-of-Play	\$4,100,200	\$20,136,600	\$20,100														
Investment Level	2	Out-of-Play	\$4,093,700	\$20,097,300	\$214,400														
Investment Level	3	Out-of-Play	\$40,300	\$20,700	\$6,700														
Overall Rank	12		\$5,700	\$90,700	\$94,100														
Investment Level	10	Out-of-Play	\$5,700	\$94,100	\$94,100														
Investment Level	1	Out-of-Play	\$375,400	\$4,539,200	\$4,163,800	\$24,700													
Investment Level	2	Out-of-Play	\$395,300	\$5,005,200	\$4,609,900	\$395,300													
Investment Level	1	Out-of-Play	\$207,700	\$1,199,200	\$991,500	\$131,777													
Investment Level	3	Out-of-Play	\$47,100	\$80,400	\$33,300	\$47,100													
Investment Level	4	Out-of-Play	\$30,100	\$40,400	\$10,300	\$30,100													
Investment Level	9	Out-of-Play	\$46,900	\$164,300	\$117,400	\$46,900													
Overall Rank	9		\$179,200	\$179,200	\$179,200														
Investment Level	1	Out-of-Play	\$179,200	\$179,200	\$179,200														
Investment Level	4	Out-of-Play	\$179,200	\$179,200	\$179,200														
Investment Level	2	Out-of-Play	\$108,800	\$108,800	\$108,800														
Investment Level	3	Out-of-Play	\$69,400	\$69,400	\$69,400														
Overall Rank	6		\$48,900	\$48,900	\$48,900														
Investment Level	1	Out-of-Play	\$48,900	\$48,900	\$48,900														
Investment Level	2	Out-of-Play	\$48,900	\$48,900	\$48,900														
Investment Level	3	Out-of-Play	\$48,900	\$48,900	\$48,900														
Investment Level	4	Out-of-Play	\$48,900	\$48,900	\$48,900														
Overall Rank	5		\$107,200	\$107,200	\$107,200														
Investment Level	1	Out-of-Play	\$107,200	\$107,200	\$107,200														
Investment Level	2	Out-of-Play	\$107,200	\$107,200	\$107,200														
Investment Level	3	Out-of-Play	\$107,200	\$107,200	\$107,200														
Investment Level	4	Out-of-Play	\$107,200	\$107,200	\$107,200														
Overall Rank	4		\$27,500	\$1,442,278	\$1,469,778														
Investment Level	1	Out-of-Play	\$27,500	\$1,442,278	\$1,469,778														
Investment Level	2	Out-of-Play	\$27,500	\$1,442,278	\$1,469,778														
Investment Level	3	Out-of-Play	\$27,500	\$1,442,278	\$1,469,778														
Investment Level	4	Out-of-Play	\$27,500	\$1,442,278	\$1,469,778														
Overall Rank	3		\$180,000	\$180,000	\$180,000														
Investment Level	1	Out-of-Play	\$180,000	\$180,000	\$180,000														
Investment Level	2	Out-of-Play	\$180,000	\$180,000	\$180,000														
Investment Level	3	Out-of-Play	\$180,000	\$180,000	\$180,000														
Investment Level	4	Out-of-Play	\$180,000	\$180,000	\$180,000														
Overall Rank	2		\$1,500	\$2,000	\$3,500														
Investment Level	1	Out-of-Play	\$1,500	\$2,000	\$3,500														
Investment Level	2	Out-of-Play	\$1,500	\$2,000	\$3,500														
Investment Level	3	Out-of-Play	\$1,500	\$2,000	\$3,500														
Investment Level	4	Out-of-Play	\$1,500	\$2,000	\$3,500														
Overall Rank	1		\$500	\$500	\$500														
Investment Level	1	Out-of-Play	\$500	\$500	\$500														
Investment Level	2	Out-of-Play	\$500	\$500	\$500														
Investment Level	3	Out-of-Play	\$500	\$500	\$500														
Grand Total			\$8,277,900	\$37,273,100	\$222,000	\$64,039,339	\$136,900	\$815,240	\$391,220	\$906,000	\$1,408,000	\$1,748,800	\$347,210	\$5,292,000	\$12,210,000	\$758,412	\$97,689	\$5,205,317	\$156,089,558

The Overall Rank is the end result of the DHCOT ADA Frictionless Methodology. The methodology takes into account the reason a pedestrian facility feature is non-compliant; the number of bus stops and public use facilities within a 1/2 mile and a 1/2 mile and the relative importance of the pedestrian feature. The Overall Rank can range from 1, the lower priority, to 15, the highest priority.

Investment Level 1 areas are often multiphases, towns, or urban/urbanizing places in counties. Density is generally higher than in the surrounding areas. There are a variety of transportation opportunities available. Building may have mixed uses, such as a business on the first floor and apartments above or multi-unit residential services.

Investment Level 2 areas can be composed of developed areas within municipalities, rapidly growing areas in the counties that have or will have public water and wastewater services and utilities areas that are generally adjacent to or near transportation Level 1 areas, smaller towns and rural villages that include growth consistently with their historic character and suburban areas with public water, wastewater, and other services.

Investment Level 3 areas generally fall into two categories. The first category covers lands that are in the long-term growth plans of counties or municipalities where development is not necessary to accommodate expected population growth during the five year planning period for long-term. The second category includes lands that are adjacent to or intermingled with fast growing areas within counties or municipalities where growth is expected to occur. The second category includes lands that are adjacent to or intermingled with fast growing areas within counties or municipalities where growth is expected to occur.

Investment Level 4 areas are rural in nature, and are where the bulk of the state's open space/critical areas and agricultural lands are located.

Out-of-Play areas are areas which are not available for development, include publicly owned lands, and/or for which various legal and/or environmental constraints on development are identified, and lands in some form of permanent open space protection.

Sussex County Summary of Cost to Repair or Replace Non-Compliant Pedestrian Features by Overall Rank and Investment Level

BDOT Sidewalk Inventory and ADA Assessment - Phase I, II, and III
 Field Data Collection and ADA Assessment of Sidewalks in BDOT Right of Way Investment Levels 1-4

Overall Rank	Investment Level	Curb Barrier*	Curb Bump - Repair Existing*	Curb Bump - Repair New*	Sidewalk*	Non-Compliant Sidewalk 20 Feet or Less	Vertical Elevation	Horizontal Gaps	Driveway Crossing or Compliant Sidewalk	Driveway Crossing on Non-Compliant Sidewalk	Railroad / Park Crossing	Pinch Point	Bus Stop Pedon Pass	Pedestrian Signal*	Market Crosswalks	Missing Links 100 Feet or Less	Missing Links Greater than 100 Feet	Grand Total
Overall Rank	15	\$120,600	\$187,600															\$333,200
Investment Level	1	\$120,600	\$187,600															\$333,200
Overall Rank	13	\$138,690	\$429,200															\$567,890
Investment Level	1	\$138,690	\$429,200															\$567,890
Investment Level	2	\$13,500	\$13,500															\$27,000
Overall Rank	12	\$89,700	\$3,706,100															\$3,795,800
Investment Level	1	\$89,700	\$3,706,100															\$3,795,800
Investment Level	2	\$167,500	\$2,887,200															\$3,054,700
Investment Level	3	\$20,100	\$23,700															\$43,800
Investment Level	4		\$53,600															\$53,600
Overall Rank	9		\$26,800															\$26,800
Investment Level	1		\$26,800															\$26,800
Overall Rank	8	\$90,100	\$490,100															\$580,200
Investment Level	1	\$90,100	\$490,100															\$580,200
Investment Level	2	\$137,500	\$435,500															\$573,000
Investment Level	3	\$140,900	\$241,200															\$382,100
Investment Level	4		\$6,700															\$6,700
Overall Rank	6		\$6,700															\$6,700
Investment Level	1		\$6,700															\$6,700
Investment Level	2		\$6,700															\$6,700
Investment Level	3		\$6,700															\$6,700
Investment Level	4		\$6,700															\$6,700
Overall Rank	5		\$20,100															\$20,100
Investment Level	1		\$20,100															\$20,100
Investment Level	2		\$20,100															\$20,100
Investment Level	3		\$20,100															\$20,100
Investment Level	4		\$20,100															\$20,100
Overall Rank	4		\$2,500															\$2,500
Investment Level	1		\$2,500															\$2,500
Investment Level	2		\$2,500															\$2,500
Investment Level	3		\$2,500															\$2,500
Investment Level	4		\$2,500															\$2,500
Overall Rank	3		\$17,000															\$17,000
Investment Level	1		\$17,000															\$17,000
Investment Level	2		\$17,000															\$17,000
Investment Level	3		\$17,000															\$17,000
Investment Level	4		\$17,000															\$17,000
Overall Rank	2		\$67,000															\$67,000
Investment Level	1		\$67,000															\$67,000
Investment Level	2		\$67,000															\$67,000
Investment Level	3		\$67,000															\$67,000
Investment Level	4		\$67,000															\$67,000
Overall Rank	1		\$1,000															\$1,000
Investment Level	1		\$1,000															\$1,000
Investment Level	2		\$1,000															\$1,000
Investment Level	3		\$1,000															\$1,000
Investment Level	4		\$1,000															\$1,000
Overall Rank	0		\$22,500															\$22,500
Investment Level	1		\$22,500															\$22,500
Investment Level	2		\$22,500															\$22,500
Investment Level	3		\$22,500															\$22,500
Investment Level	4		\$22,500															\$22,500
Overall Rank	0		\$200															\$200
Investment Level	1		\$200															\$200
Investment Level	2		\$200															\$200
Investment Level	3		\$200															\$200
Investment Level	4		\$200															\$200
Grand Total		\$2,117,200	\$9,132,200	\$96,000	\$19,396,570	\$272,280	\$232,040	\$73,300	\$4,140,000	\$8,316,000	\$724,500	\$137,620	\$666,400	\$1,170,000	\$157,999	\$43,521	\$1,106,936	\$47,793,486

* The cost of fixing non-compliant medians and channelized islands is covered under curb ramps and sidewalks.
 The Overall Rank is the end result of the BDOT ADA Prioritization Methodology. The methodology takes into account the reason a pedestrian facility feature is non-compliant, the number of bus stops and public use facilities within a 1/4 mile and between a 1/4 mile and a 1/2 mile and the relative importance of the pedestrian feature. The Overall Rank can range from 1, the lowest priority, to 15, the highest priority.

Investment Level 1 areas are often municipal trees, trees, or urban/urbanizing places in context. Density is generally higher than in the surrounding areas. There are a variety of transportation opportunities available. Buildings may have mixed uses, such as a business on the first floor and apartment above.
 Investment Level 2 areas can be composed of less developed areas with municipalities, rapidly growing areas in the context that have or will have public water and wastewater services and utilities, as well as are generally adjacent to or near Investment Level 1 areas, municipalities and/or villages that should grow consistently with their historic character, and suburban areas with public water, wastewater and utility services.

Investment Level 3 areas generally fall into two categories. The first category consists of areas of existing or unimproved where development is not necessary to accommodate expected population growth during this five-year planning period (or longer). The second category includes lands that are adjacent to or intermingled with fast growing areas within counties or municipalities that are otherwise categorized as Investment Level 1 or 2. These lands are most often located by predominantly residential areas and agricultural industry is located.
 Investment Level 4 areas are rural in nature, and are where the bulk of the state's open space/natural areas and agricultural industry is located.

Out-of-Play areas are lands which are not at all available for development under public ownership, land for which various legal and/or environmental constraints on development are identified, and lands in some form of permanent open space protection.