

City of Dacono, Colorado

ADA Transition Plan Summary

April 24, 2025



Meeting the Challenge, Inc., an STV Company

5755 Mark Dabling Blvd, Colorado Springs, CO 80919

254.399.7165

Contents

Introduction	2
Facilities Audited	2
Regulatory Requirements	5
Program Access: Creating a Community for Everyone	5
Program Access Is About People.....	5
Prioritizing High-Impact Areas	5
Transition Plan	6
Current Self-evaluation and Transition Plan Requirements	6
A Brief Summary of Data Collection Activity and Findings	6
Public Right of Way	6
Facilities.....	7
Funding the Transition Plan	8
Public Private Partnering.....	8
Prioritization.....	8
Public Engagement.....	9
Conclusion.....	9

Introduction

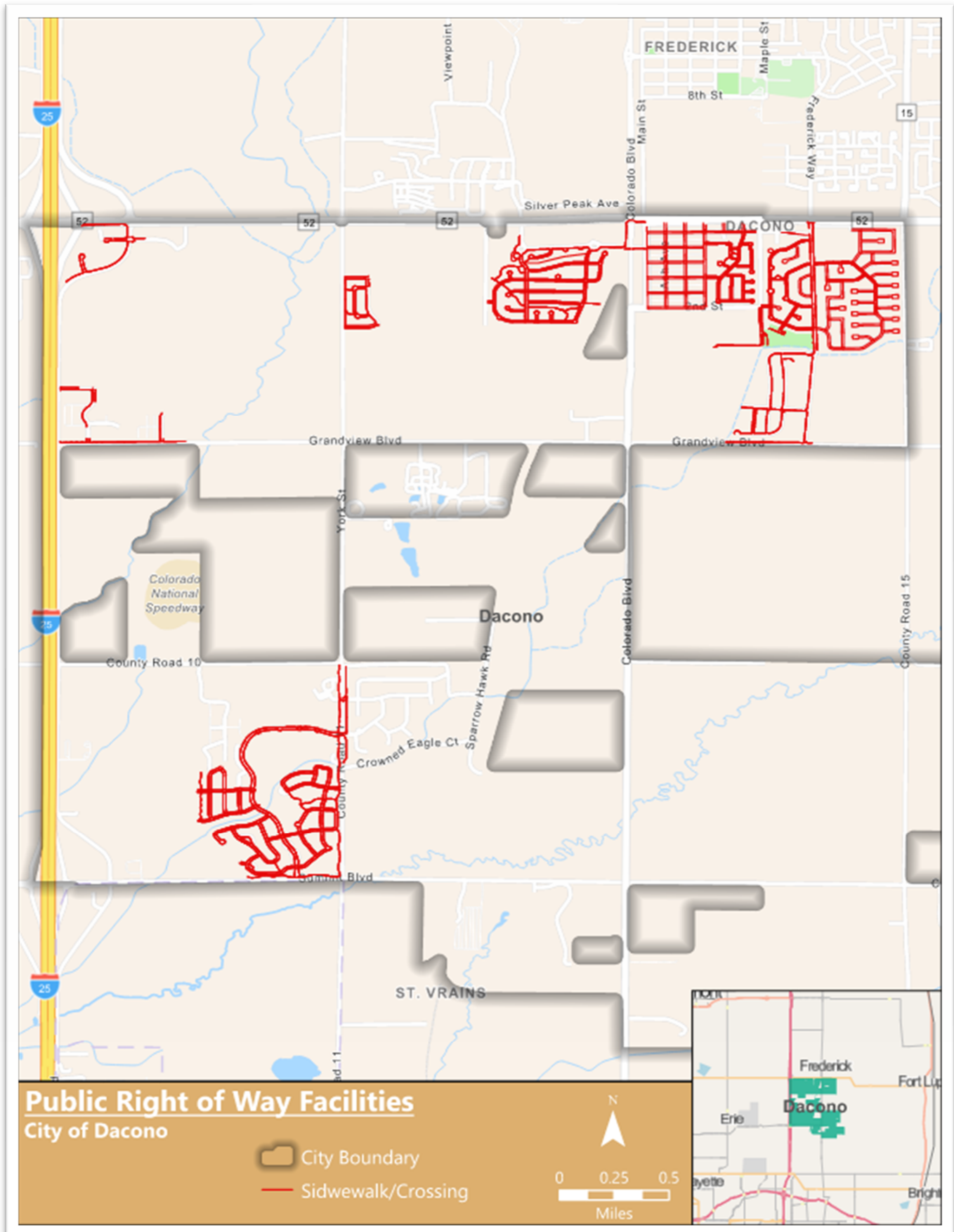
The City of Dacono has engaged the services of Meeting the Challenge, Inc, an STV Company (STV) to conduct an on-site review of Dacono's pedestrian facilities and a Facility Assessment at select city facilities, parks, and trails for compliance with the requirements of Title II of the Americans with Disabilities Act (ADA). This is part of a larger Transportation Master Plan conducted by Felsburg Holt & Ullevig(FHU) in partnership with STV. On September 23rd, 2024, STV began data collection, which consisted of photographing, measuring objects and ground surfaces around the pedestrian walkway, accessible routes to and from the facility, general site elements, and accessibility elements around the facility's exterior. STV's role in the project was to gather data, analyze compliance with ADA requirements, report its findings, and provide recommendations to resolve findings of deficiencies. Dacono plans to incorporate the findings from the subsequent data collection into Transition Plan.

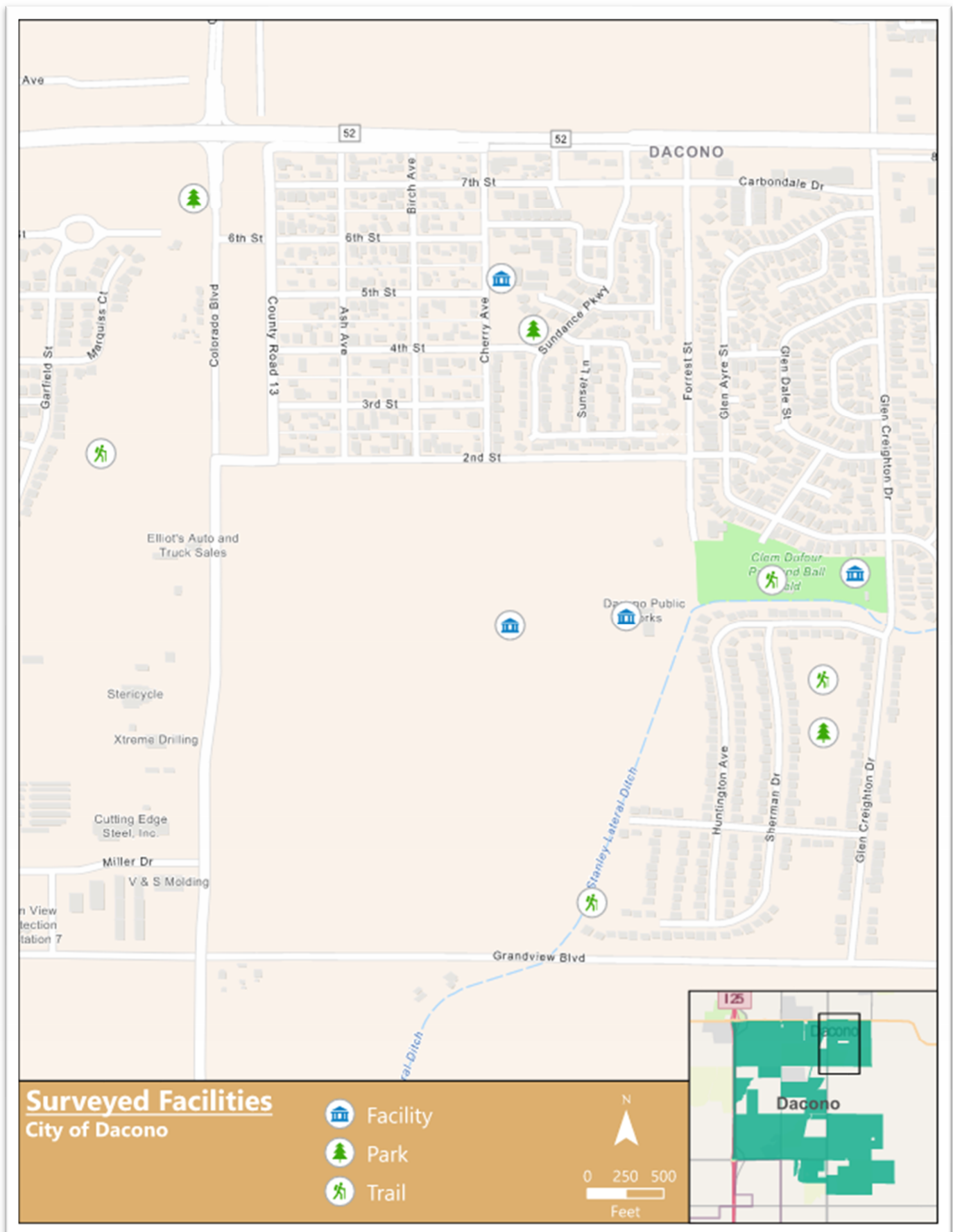
This report includes a summary of the data collected from the pedestrian facilities in Dacono's right-of-way for elements inconsistent with the scoping and technical provisions of the U.S. Access Board's [Public Rights-of-Way Accessibility Guidelines](#) (PROWAG). The pedestrian facilities were surveyed in October through December of 2024, and priorities were assigned to areas based on a prioritization developed through communication with the city. This report also includes a summary of findings of architectural barriers at City buildings, parks, and trails. STV collected data at select City facilities to identify conditions affecting access to City services, programs, or activities. The evaluation of compliance with the ADA's physical accessibility requirements is based on the [2010 ADA Standards for Accessible Design](#) (ADA Standards). Though the Access Board's Architectural Barriers Act Accessibility Standards for [Outdoor Developed Areas](#) (ABAAS/ODA) are federal standards, that have not yet been adopted by the Department of Justice (DOJ) as ADA Standards, they serve as best practices to achieve program access for those elements which do not have formal ADA standards.

Facilities Audited

The facilities covered by this report are:

- Public Right of Way, Dacono's pedestrian network, including sidewalks, curb ramps, and street crossings.
- City Hall Campus, Exterior only
- Centennial Field
- Public Works, Exterior only
- Clem Dufour Park and Trail
- David H. Osborne Park
- Autumn Valley Trail
- Veterans Memorial Park and Trail
- Ditch Trail





Regulatory Requirements

The Americans with Disabilities Act (ADA) Title II and its Part 35 regulations mandate that state and local governments prohibit disability-based discrimination and ensure that public services, programs, and activities are accessible to qualified individuals with disabilities. Public entities must administer their services, programs, and activities in the most appropriate setting for individuals with disabilities. All facilities serving the public must meet ADA standards to ensure that individuals with disabilities have access to the same services, amenities, and civic participation opportunities as others.

Program Access: Creating a Community for Everyone

In areas where public sidewalks are exceedingly narrow or intersect with streets that lack curb ramps, it is reasonable to conclude that such conditions either prevent or significantly hinder access to the pedestrian transportation program for individuals with disabilities. These barriers not only compromise safety but also exclude many from fully participating in community life. As such, it is both logical and necessary to seek updated standards and guidance that support construction designed to ensure equal access for all.

Program Access Is About People

Decisions regarding which barriers to address first must focus foremost on the impact to individuals—particularly those with disabilities. The overarching goal is to create environments where people of all abilities can move independently, safely, and with dignity. Enhancing accessibility in Dacono’s pedestrian facilities not only benefits individuals with disabilities, but also improves walkability for seniors, children, parents with strollers, and anyone navigating the city on foot. Improved pedestrian infrastructure contributes to public health, reduces transportation inequality, and fosters stronger community connections.

Program access goes beyond just sidewalks. It extends to all public pedestrian facilities, including curb ramps, crosswalks, public parking areas, and building entrances. Accessible facilities include clearly marked crosswalks, ramps with appropriate slopes, and entrances designed to be navigable without steps. In Dacono, ensuring that facilities such as City Hall, parks, and public restrooms are ADA-compliant is essential to supporting full civic participation. These upgrades reinforce the city’s commitment to inclusion and ensure that all residents, regardless of ability, can engage with the community and access public services.

Prioritizing High-Impact Areas

While all locations within this project's scope are considered important, Dacono can elevate areas with higher pedestrian activity—such as commercial business corridors, public buildings, schools, and recreational spaces—as top priorities for barrier removal. Investments in accessibility in these areas will yield the greatest benefit, not only to people with disabilities but to the broader public, by fostering an inclusive and walkable environment that enhances economic opportunity and quality of life.

Dacono’s commitment to accessible pedestrian transportation infrastructure is a vital step toward an inclusive and livable community. By following PROWAG guidelines, prioritizing people over projects, and investing in accessible facilities citywide, Dacono can ensure that the pedestrian network serves residents of all ages and abilities—today and into the future.

Transition Plan

If the conditions or features of a public entity's facilities prevent access to its programs, it must develop a Transition Plan to resolve physical barriers. The public must be allowed to participate in developing the Transition Plan by submitting comments. The Transition Plan must be retained and available for public inspection. In addition to providing an opportunity for public comments, Dacono's Transition Plan must have four required components:

1. Identify physical barriers limiting access to programs or activities.
2. Provide a detailed description of the methods that will be used to eliminate those barriers.
3. Schedule the steps necessary to eliminate those barriers, including measures that will be required each year after the first year of the Plan.
4. Name the individual(s) responsible for implementing the Plan.

Current Self-evaluation and Transition Plan Requirements

The process of Self-evaluation and the development of a Transition Plan were original administrative actions of Title II required by Part 35 regulations to be completed within six months of January 26, 1992. Whether or not the City of Dacono created or implemented a Transition Plan for its pedestrian facilities in the 1990s, it must ensure that its pedestrian transportation network is accessible to and usable by individuals with disabilities. The construction of new and alterations to existing pedestrian facilities, & facilities have been required to be consistent with accessible design standards and guidance since January 26, 1992.

Until March 15, 2012, the City of Dacono had the option of using one or the other of the Uniform Federal Accessibility Standards (UFAS) or the ADA Accessibility Guidelines (ADAAG, 1991). Since March 15, 2012, the applicable accessible design standards are the 2010 ADA Standards for Accessible Design, and any construction – new or alterations to existing sites or facilities on sites – must meet the 2010 ADA Standards at minimum. There is some ambiguity regarding the applicable design standards or guidelines before the Federal Highway Administration's recognition of PROWAG as [best practices for pedestrian facilities](#) in public rights-of-way, effective January 23, 2006.

A Brief Summary of Data Collection Activity and Findings

Public Right of Way

STV data collectors documented more than **26,200** attributes (measurements of dimensions or slopes and observations of other conditions necessary) to identify **4,121 non-compliant** elements at approximately 500 corners of 200 intersections, including 539 (499 non-compliant) curb ramps and blended transitions. STV data collectors and analysts documented data for 41 miles of sidewalk.

The following table represents a sample of common non-compliant findings identified during the assessment.

Location/Description	Attribute	Total Count (Attribute)	Total Count Non-Compliant
Curb Ramp Diagonal <15' (STD)	Slope, Running	375	79
	Slope, Cross	375	96
	Slope, counter	375	127
	Pedestrian Access Route Not Within Marked Crosswalk	375	214
	Turning space at top?	375	315
	Detectable warning present?	375	229
Walking Surface	Cross Slope	800	611
	Passing Space Not Provided	1000	647
	Walking Surface is too Narrow	1000	311
*Simple Vertical Discontinuity	Dim, height of vertical level change	83	83
Curb Ramp Blended Transition	Detectable warning, present?	8	4
	Slope, counter	8	2
	Slope, cross	8	3
	Within marked crosswalk?	8	5
Curb Ramp Perpendicular <15' (STD)	Detectable warning present?	64	29
	Grade break on ramp surface?	64	2
	Slope, counter	64	20
	Slope, cross	64	25
	Slope, running	64	16
	Turning space at top?	64	34
	Within marked crosswalk?	64	51
Curb Ramp Parallel (2) Both <15' (STD)	Detectable warning, on ramp surface?	8	0
	Slope, running left	8	1
	Slope, running right	8	1
Driveway	Dim, width perpendicular to street	20	0
	Slope, perpendicular to roadway	20	20
*Horizontal Opening	Dim, width of gap	14	14
*Protrusion, Organic	Dim, depth	49	49
*PSC No Yield or Stop	Slope, cross	13	2
	Slope, running	13	11

Facilities

STV documented more than of **1,961 attributes**, each representing a measurement or observation made by data collectors and reported **175 non-compliant** attributes and **9 Not Best Practice** attributes. The analysts then compiled the data and added recommendations for remediation of findings, citations to the ADA Standards (or other guidelines where appropriate), estimated mitigation difficulty, and calculated the relative priority of findings in the database. In some instances, it may be prudent to remove a program from an inaccessible space, or to modify practices rather than removing a structural barrier. STV can make recommendations but cannot make these critical decisions.

The following table represents a sample of common non-compliant findings identified during the assessment.

Location/Description	Element	Attribute	Total Count (Attribute)	Total Count Non-Compliant
Parking	Parking Space, Standard	Slope, maximum	4	1
Walkway	Walking Surface	Slope, Cross	36	20
Walkway	Curb Ramp	Slope, Running	4	1
Walkway	Walking Surface	Firm, stable, slip resistant	40	11
Walkway	Ramp	Slope, Running	2	2
Restrooms	Grab Bar Rear	Dim, height to top of grab bar	2	0

Funding the Transition Plan

Inevitably, whenever there is a question of *when* to execute plans to alter or build public facilities, the availability and allocation of necessary funds and other resources will play a significant role in finding the answer. To contemplate the implementation schedule for a Transition Plan without considering the costs and the budgetary resources is impossible. Existing and future budgets large enough to cover all costs of implementing a Transition Plan will need to be considered before adopting the Transition Plan. In STV's experience, funding that comes through state departments of transportation from the U.S. Department of Transportation will receive higher scores for grant proposals that emphasize the inclusion of ADA improvements.

In central business districts, where for-profit retail and commercial entities have parallel responsibilities for compliance with the ADA (Title III), the ADA provides tax incentives for removing barriers to accessibility. Private-public partnerships may reduce the cost to Dacono in improving pedestrian facilities.

Public Private Partnering

As the cost of implementing an ADA Transition Plan is an inevitable concern, opportunities for public-private partnering should be considered. The ADA includes tax incentives, such as the Disabled Access Credit (for small businesses) and the Barrier Removal Deduction, to subsidize private entities' efforts to comply with the ADA (covered by Title III). There may be opportunities, depending on the location, for sharing the cost of the efforts between Dacono and businesses which would be mutually beneficial.

Prioritization

The most important and most difficult phase of developing a Transition Plan is composing a realistic and practical schedule for the implementation of the Plan. The location of a barrier speaks to the primary concern of program access. The purpose of a Transition Plan is to ensure that a public entity can operate each of its services, programs, or activities, when viewed in their entirety, in a way which makes them readily accessible to and usable by individuals with disabilities. This does not require a public entity to make each of its existing facilities accessible to and usable by individuals with disabilities. However, architectural conditions, *i.e.*, barriers, which prevent or might prevent or limit access to a program, must be included in a Transition Plan.

Nonconforming conditions or potential barriers – based on their location and the degree, frequency, or amount of public access expected at that location – which have negligible probability of impeding access to programs, have little or no priority for remediation in a Transition Plan, regardless of magnitude or severity. These findings should be listed in a Transition Plan, though they typically will not need to be scheduled until a significant event or action triggers the need to resolve them. The events or conditions which might trigger the need to fix these findings, in the future, include the following:

- Need to remove a physical barrier as a title I Reasonable Accommodation for an employee.
- Location of a new or existing program to this room/space
- Renovation/alteration of the space
- Alteration of a primary function area triggering path of travel barrier removal
- Discovery that a nonconforming condition was designed/built by construction or alteration after January 26, 1992, construction or alteration.
- A specific request/complaint from the public

The Transportation Master Plan will also help with prioritizing as project identified in the master plan with have some overlap existing pedestrian network areas.

Public Engagement

Input from the public is required ([§35.150\(d\)\(1\)](#)) and essential to evaluating Transition Plan priorities. It is also important to facilitate ongoing input from the public to identify new or previously unidentified barriers to program access. Develop procedures, including public outreach, to ensure that the public knows, how to:

- Report barriers
- Request accommodations, auxiliary aids and services.
- Contact the ADA Compliance Manager

- File a formal complaint.

The regulations also require the City to *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 on this document* ([§35.105\(b\)](#)).

Conclusion

Many pedestrian facilities across the country are commonly in a state of disrepair. Dacono's sidewalks are not typical – that is, they are in better condition than many of the sidewalks/ pedestrian facilities surveyed by STV. However, conditions still exist that may present barriers to some individuals with disabilities. Many of the same findings for conditions inconsistent with the scoping and technical provisions of PROWAG identify conditions that make sidewalks challenging to travel for everyone, not just people with disabilities. The accessible design provisions of PROWAG will provide safer and more useful sidewalks for everyone. From curb ramps that offer convenience for parents pushing strollers to walking surface that are wide enough, the need for and implementation of improvements identified by this study will benefit people of all abilities.

Assuming the fiscal resources needed to fulfill all the needs identified in this study are not immediately available, the prioritization process helps establish a long-term strategy that allows fiscal responsibility while consistently fixing the facilities that will deliver the most significant benefit to the community. Continuing with regular cycles for maintenance, repair, and improvement of facilities should address elements identified in the data for *as-is* conditions inconsistent with PROWAG and ADA provisions. When questions of priority and the schedule for mitigating barriers arise, the answers should always be to eliminate those barriers first, improving accessibility for the greatest number of people.