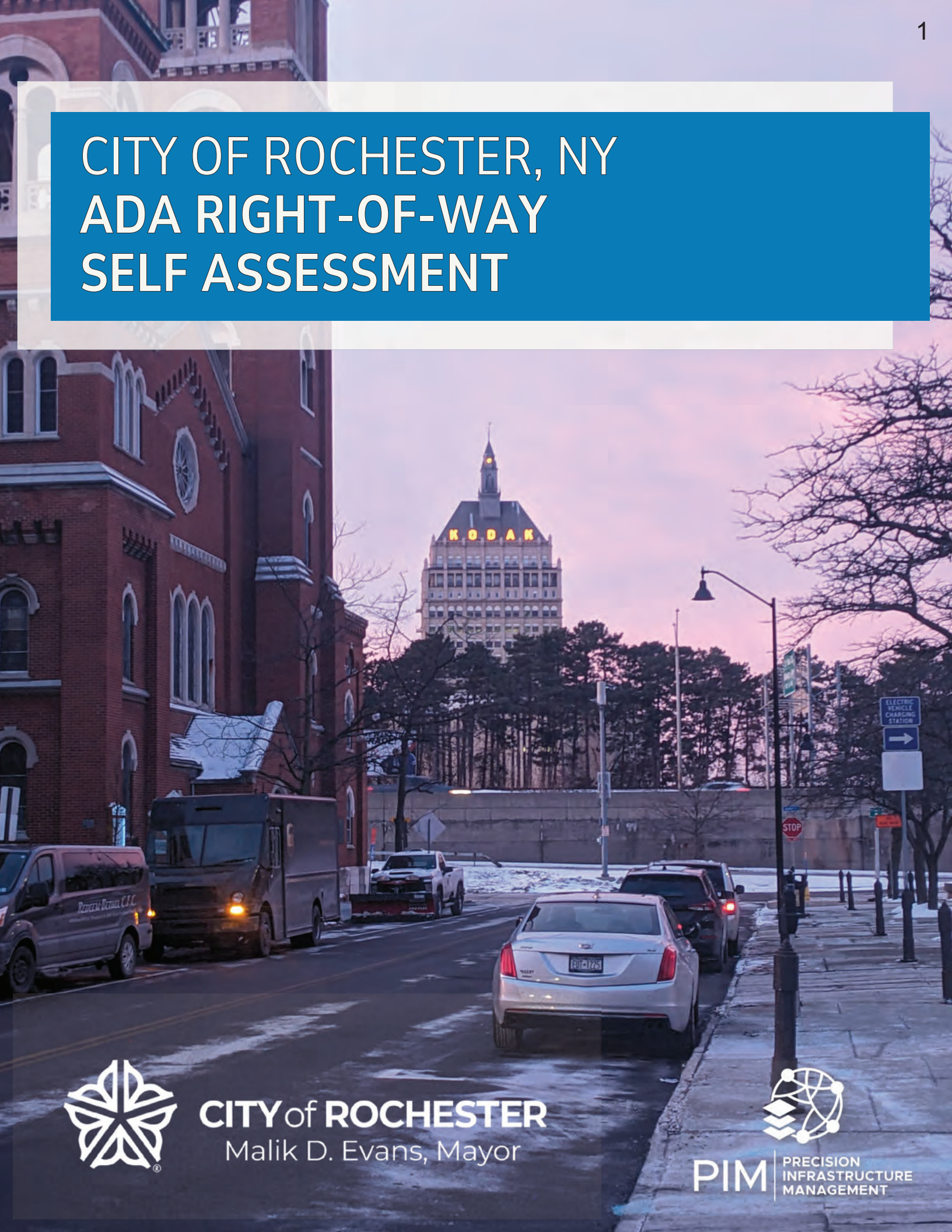
CITY OF ROCHESTER, NY
AMERICANS WITH DISABILITIES ACT RIGHT-OF-WAY TRANSITION PLAN

CITY of ROCHESTER
Malik D. Evans, Mayor

PIM | PRECISION INFRASTRUCTURE MANAGEMENT

Table of Contents

CITY OF ROCHESTER, NY
ADA RIGHT-OF-WAY SELF ASSESSMENT



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PIM PRECISION INFRASTRUCTURE MANAGEMENT

Transition Plan Overview

The purpose of an Americans with Disabilities Act (ADA) Transition Plan is to ensure the residents and visitors of the City of Rochester have full access to the City of Rochester's programs, services, and activities. It is designed to accommodate people with disabilities and provide fair access to facilities without limiting their quality of life. The City of Rochester is committed to meeting all the accessibility needs of disabled individuals. This ADA Transition Plan includes those plan components specifically requested by the City of Rochester to fulfill requirements of the ADA regarding the public right of way.

The Americans with Disabilities Act is a civil rights law prohibiting discrimination against individuals on the basis of disability. It was enacted on July 26, 1990 and was amended in 2008 with the ADA Amendments Act. The ADA consists of five titles outlining protections in the following areas:

- I. Employment
- II. State and local government services
- III. Public accommodations
- IV. Telecommunications
- V. Miscellaneous provisions

As required by Title II of ADA (28 CFR Part 35 Sec. 35.105 and Sec. 35.150), the City of Rochester has conducted a self-evaluation of its public rights-of-way (PROW), and has developed this Transition Plan detailing the methods to be used to ensure compliance with ADA accessibility requirements.

The City of Rochester has complied with Title II of the Americans with Disabilities Act by creating this ADA Transition Plan.

Agency and Requirements

Under Title II, the City of Rochester must meet these general requirements:

- Must designate at least one responsible employee to coordinate ADA compliance [28 CFR Sec. 35.107(a)]. This person is typically referred to as the ADA Coordinator. The public entity must provide the ADA Coordinator's name, office address, and telephone number to all interested individuals [28 CFR Sec. 35.107(a)].
- Must provide notice of ADA requirements. All public entities, regardless of size, must provide information about the rights and protections of Title II to applicants, participants, beneficiaries, employees, and other interested persons [28 CFR Sec. 35.106]. The notice must include the identification of the employee serving as the ADA Coordinator and must provide this information on an ongoing basis [28 CFR Sec. 104.8(a)].
- Public entities are required to establish and publish grievance procedures to ensure the prompt and equitable resolution of ADA-related complaints [28 CFR Sec. 35.107(b)]. While individuals are not obligated to use this internal grievance process before filing a federal complaint, having a grievance procedure in place facilitates a timely, local resolution of accessibility issues and helps prevent conflicts from escalating to litigation or the formal federal complaint process.

Designation of Responsibility

In accordance with 28 CFR 35.107(a), the City of Rochester has designated the following person to serve as ADA Title II Coordinator, to oversee the City of Rochester's policies and procedures:

- Name: Dr. Rose M. Nichols
- Title: ADA Coordinator/Director HR
- Phone: 585-557-1178
- Address: 30 Church St., Rochester, NY

In accordance with 28 CFR 35.150(d)(3), the City of Rochester has designated the following person to serve as ADA Transition Plan Implementation Coordinator:

- Name: Dr. Rose M. Nichols
- Title: ADA Coordinator/Director HR
- Phone: 585-557-1178
- Address: 30 Church St., Rochester, NY

Self-Evaluation

Overview

Under Title II of the ADA (28 CFR Sec. 35.105), public entities are required to perform a self evaluation of their facilities on public property and within public rights-of-way, in order to identify any obstacles or barriers to accessibility that need to be addressed. The general categories of items to be evaluated include:

- Sidewalk mileage calculation
- Vertical height displacement (VHD) locations
- Severely degraded sidewalks requiring demolition and replacement
- Absence of curb ramps or detectable warnings
- Demolition and replacement
- Narrow or missing sidewalk sections.

Public entities are required to provide an opportunity for interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the self-evaluation process by submitting comments [28 CFR Sec. 35.105(b)].

Process and Findings

In 2024, a consultant on behalf of the City of Rochester completed a self-evaluation of its right of way assets. Right-of-way (ROW) deficiencies were reviewed on sidewalks, curb ramps, and crosswalks. The following items were evaluated on 25% of the total City sidewalk network:

- Vertical height displacement locations;
- Absence of curb ramps;
- General curb ramp assessments;
- Missing or narrow sidewalks;
- Cross slope issues generally;
- Areas that may require demolition and replacement;
- Pedestrian Access Route (PAR) areas under 4-ft in width due to structural issues or vegetation.

These deficiencies were cataloged in a geo-database and provided to the City of Rochester. The methodology used to conduct the condition study followed the ADA Guidelines for ADA Transition Planning, Public Right of Way Accessibility Guidelines (PROWAG), and Self-Assessment Checklists for Public ROW and Facilities. The references to these are provided below:

- ADA Transition Plan Guidelines Title II Checklist: https://archive.ada.gov/pcatoolkit/noticetoolkit.htm
- Public Right-of-Way Accessibility Guidelines: https://www.access-board.gov/prowag/
- ADA Accessibility Guidelines: https://www.access-board.gov/ada/
- ADA Guide for Small Municipalities: https://archive.ada.gov/smtown.htm

An important component of the self-evaluation process is the identification of obstacles or barriers to accessibility and the corresponding modifications that will be needed to remedy these items. This report provides a summary of improvements and obstacles that the City of Rochester plans to address as part of this Transition Plan.

Public Involvement

The City of Rochester recognizes that public participation is an important component in the development of this Transition Plan. Input from the community has been gathered and used to help define priority areas for improvements.

Public involvement for preparation of this document has consisted of the following activities:

- Announcement of the ADA assessment at a Council Meeting and to the media.
- Two Steering Committee meetings in 2024 and 2025 to gather input.
- Public meetings in 2025 and 2026 to gather public input.
- Direct outreach to interested residents and groups.
- A public survey disseminated through the City of Rochester's website and available at the City of Rochester City Hall.

This document will also be made available to the public on the City of Rochester's website.

Public Notice of ADA Requirements and Grievance Procedures

Under the Americans with Disabilities Act, each agency is required to publish its responsibilities with regard to ADA compliance.

If users of the City of Rochester's facilities and services believe the City of Rochester has not provided a reasonable accommodation, they have the right to file a grievance. In accordance with 28 CFR Sec. 35.107(b), the City of Rochester has developed a grievance procedure for the purpose of the prompt and equitable resolution of citizens' complaints or concerns.

Corrective Actions Plan

- Prioritize identified issues.
- Inform and educate the City of Rochester's officials of findings.
- Develop a budget for addressing issues.
- Coordinate a schedule of needed modifications with proposed remediations.

Public Accessibility to Plan

The ADA Transition Plan will be available for review on the City of Rochester's website (https://www.cityofrochester.gov/departments/department-environmental-services-des/americans-disabilities-act-ada-right-way) and a printed copy is available for review by request at Rochester City Hall, at:

Rochester City Hall
30 Church Street, Room 300B
Rochester, NY 14614

Adoption of the Plan

This ADA Transition Plan is hereby adopted by the City of Rochester, effective:

Date: April 3, 2026

Dr. Rose M. Nichols, ADA Coordinator
ADA Title II Coordinator

Dr. Rose M. Nichols, ADA Coordinator ADA Transition Plan Implementation Coord.

Introduction

The City of Rochester and Genesee Transportation Council contracted with Precision Infrastructure Management (PIM CS LLC) in 2024 to complete an Americans with Disabilities Act (ADA) Self-Assessment of the City's public right-of-way (ROW) assets. PIM CS LLC completed the Self-Assessment **in November 2024.** This report is a comprehensive review of the assessment and includes an asset management plan to support the City's budgeting and work planning processes.

The Study found a total of **65,965 unique ADA barriers across 220 miles of Right of Way sidewalk**. A breakdown of the barriers by category is covered in this report. The 220 miles represents about a 25% sample of the Rochester ROW, with a mix of demographic and needs-based prioritization used for the selection.

Self-Assessment

Overview

Under Title II of the ADA (28 CFR Sec. 35.105), public entities are required to perform a Self-Assessment of their facilities on public property and within public rights-of-way (PROW) in order to identify any obstacles or barriers to accessibility that need to be addressed. The general categories of items evaluated for the City's ROW include:

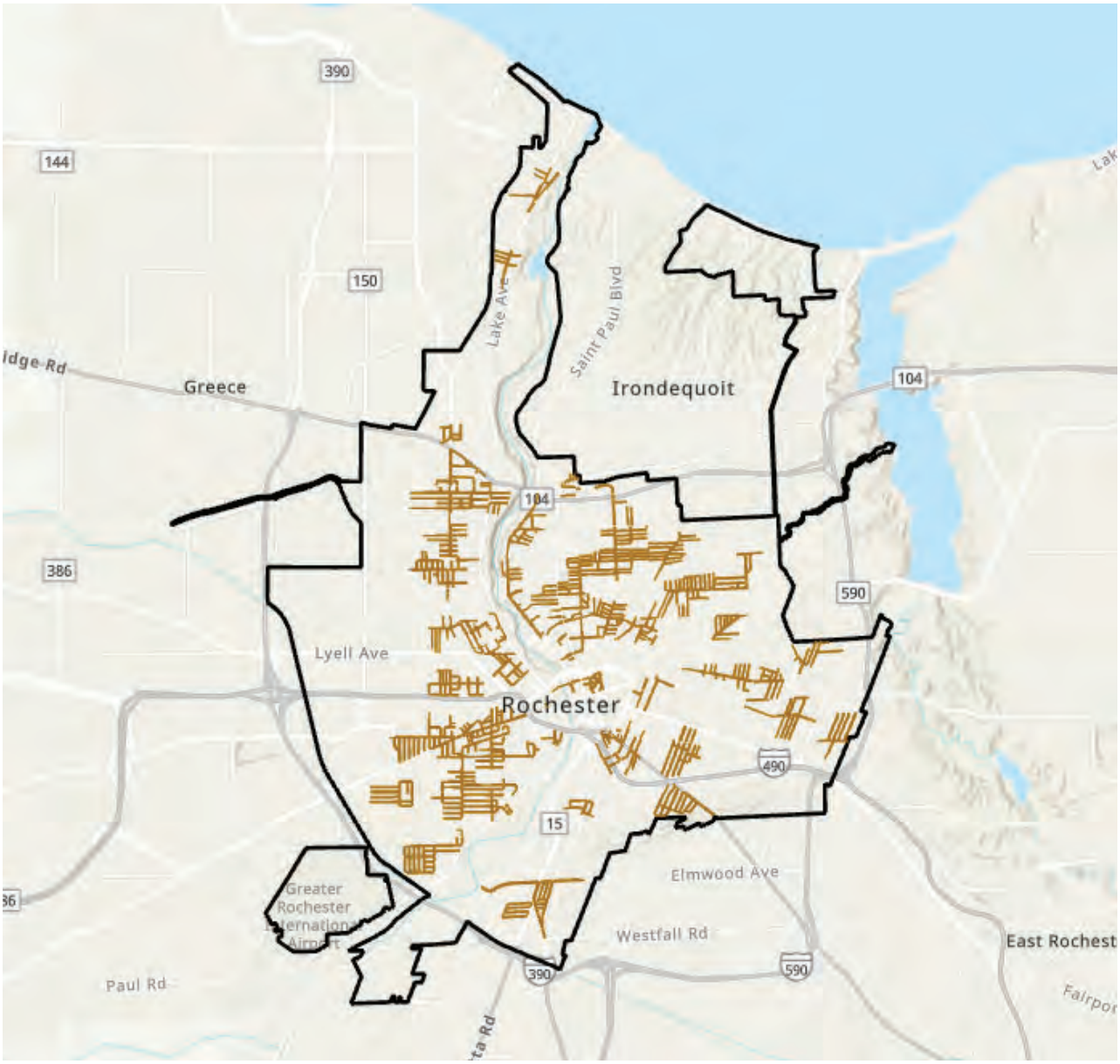
- Sidewalk mileage calculation
- Vertical Height Displacement locations
- Absence of curb ramps
- Curb ramps assessments and blended transitions
- Demolition and replacement areas
- Driveway cross slope issues
- Sidewalk width < 4 ft
- Cross slope > 4% for more than 50 ft
- Sidewalk gaps and footpaths
- Obstructions
- Ponding in the Pedestrian Access Route and street

Process & Findings

Precision Infrastructure Management employed ADA field assessment technicians to physically traverse 220 miles of sidewalk in Rochester. Technicians used 2 foot smart levels and tape measures to identify ADA barriers within the ROW. All data is stored within ESRI's ArcGIS program with photographs, GPS coordinates, and other associated metadata. The methodology used to conduct the condition study followed the Public Right of Way Accessibility Guidelines (PROWAG). These guidelines were promulgated into final rules for adoption by the United States Access Board in 2023. While they are not yet enforceable standards, it is current ADA best practice to use PROWAG standards for assessments as the expectation is that the standards will be enforceable in the future. In addition, the standards either equal or exceed current enforceable ADA requirements.

Assessment Findings Summary

The field assessment of 220 miles of ROW sidewalk included in the City of Rochester sidewalk network identified a total of 65,965 ADA barriers across the assessment categories within the scope of the project. The deficiencies are reviewed in detail in the following sections. The map image below shows the 220 miles of assessed sidewalk locations across the City. Due to budget constraints, the City was only able to assess about 25% of the total sidewalk mileage. The findings are extrapolated to the entire sidewalk network to arrive at an estimated total number of ADA barriers that will need to be remediated. The number of deficiencies found are within the normal expected range of barriers/mile for a city the size and age of Rochester, with PIM finding a similar number of barriers/mile in various other cities PIM has completed ADA transition plans for.

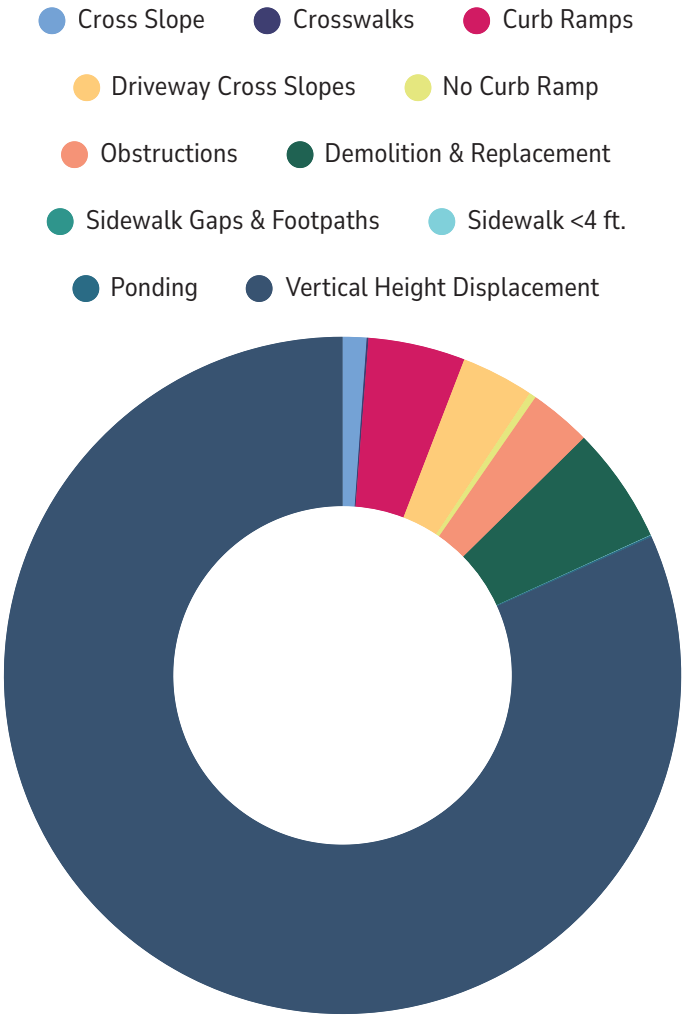


Caption: Map of Rochester, NY. Selected sidewalk locations are marked with a dark brown line.

Total Findings - ADA Barriers* in the Sampled ROW

Cross Slope > 50 ft.	752
Crosswalks	56
Curb Ramps	3,055
Driveway Cross Slopes	2,286
No Curb Ramp	220
Obstructions	1,961
Vertical Height Displacements	53,898
Demolition and Replacement	3,670
Sidewalk Gaps and Footpaths	2
Sidewalk < 4 ft.	12
Ponding	53

*Definitions for all of these barriers can be found in Appendix D: Glossary of Terms.



Vertical Height Displacements make up **81.7%** of the total findings.

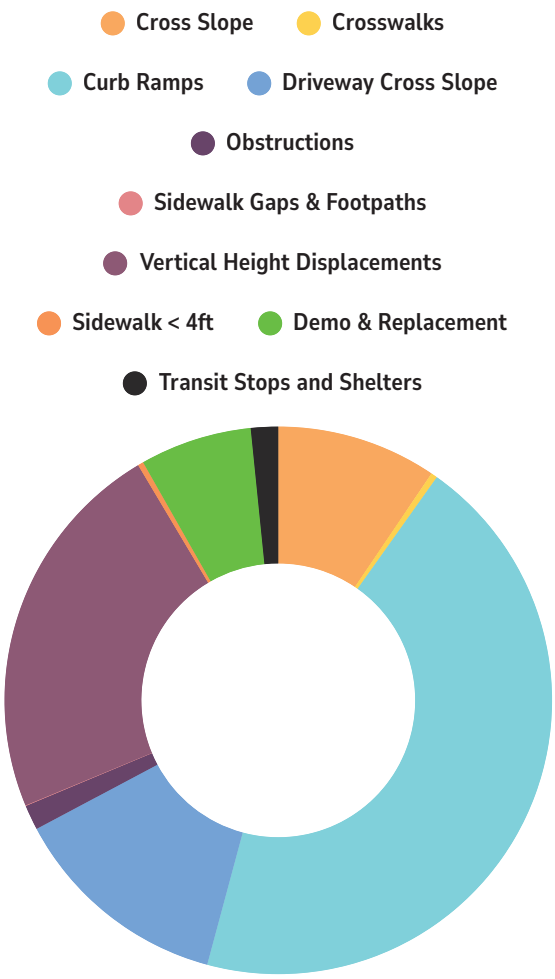
Curb Ramps make up **4.6%** of the total findings**.**

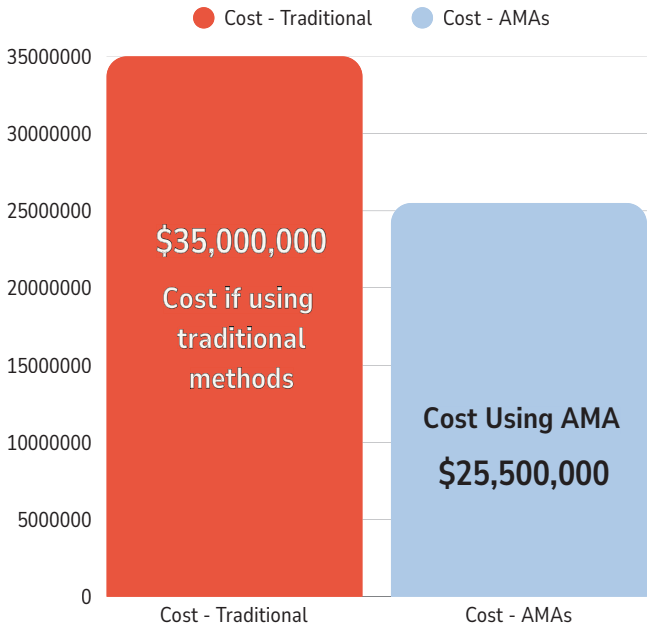
Driveway Cross Slopes make up **3.5%** of the total findings.

The combined other deficiencies consists of **10.2%** of the total findings.

Estimated Cost by Barrier Class

Cross Slope	$2,450,000
Crosswalks	$100,000
Curb Ramps	$11,460,000
Driveway Cross Slopes	$3,370,000
Obstructions	$380,000
Sidewalk Gaps	$10,000
Vertical Height Displacements	$5,870,000
Sidewalk < 4ft	$90,000
Demo & Replacements	$1,710,000
Transit Stops and Shelters	$416,000





Alternative Maintenance Activities vs. Total Cost Replacement

There are multiple methods for remediating certain ADA barriers. While some areas require full demolition and replacement of affected panels, other barriers can be mitigated using alternative maintenance activities (AMA). PIM collected data in such a manner to ensure that alternative maintenance activities could be utilized to remediate certain barriers, such as vertical height displacements (VHD) or, more rarely, curb ramps. **Utilizing alternative maintenance activities would save Rochester more than $9.5 million.**

STEPS IN RIGHT-OF-WAY ASSET MANAGEMENT PLAN

1. Identify & Inventory
2. Inspect & Assess Condition
3. Analyze & Decide
4. Prioritize Work
5. Repair or Demolish & Replace

Prioritization Methodology

Rochester will use a multi-factor prioritization approach to guide decisions on where to allocate budget for ADA barrier remediation. In addition to the data summarized below, Rochester will consider: the type of street (arterial, collector, local); proximity to key city amenities (e.g., schools, libraries, parks, community centers, and transit stops); network connectivity and system importance (closing gaps in accessible routes); equity and access considerations (supporting areas with higher need and fewer alternative travel options); and, coordination opportunities (aligning sidewalk work with planned roadway, utility, or streetscape projects). This will enable Rochester to maximize benefit and cost effectiveness in barrier remediation.

It should be noted that this initial report evaluated only one-quarter of Rochester's sidewalk network; therefore, the data presented here should be considered informational and not necessarily actionable as a standalone prioritization scheme until the remaining sidewalk network is assessed and a more comprehensive dataset is available.

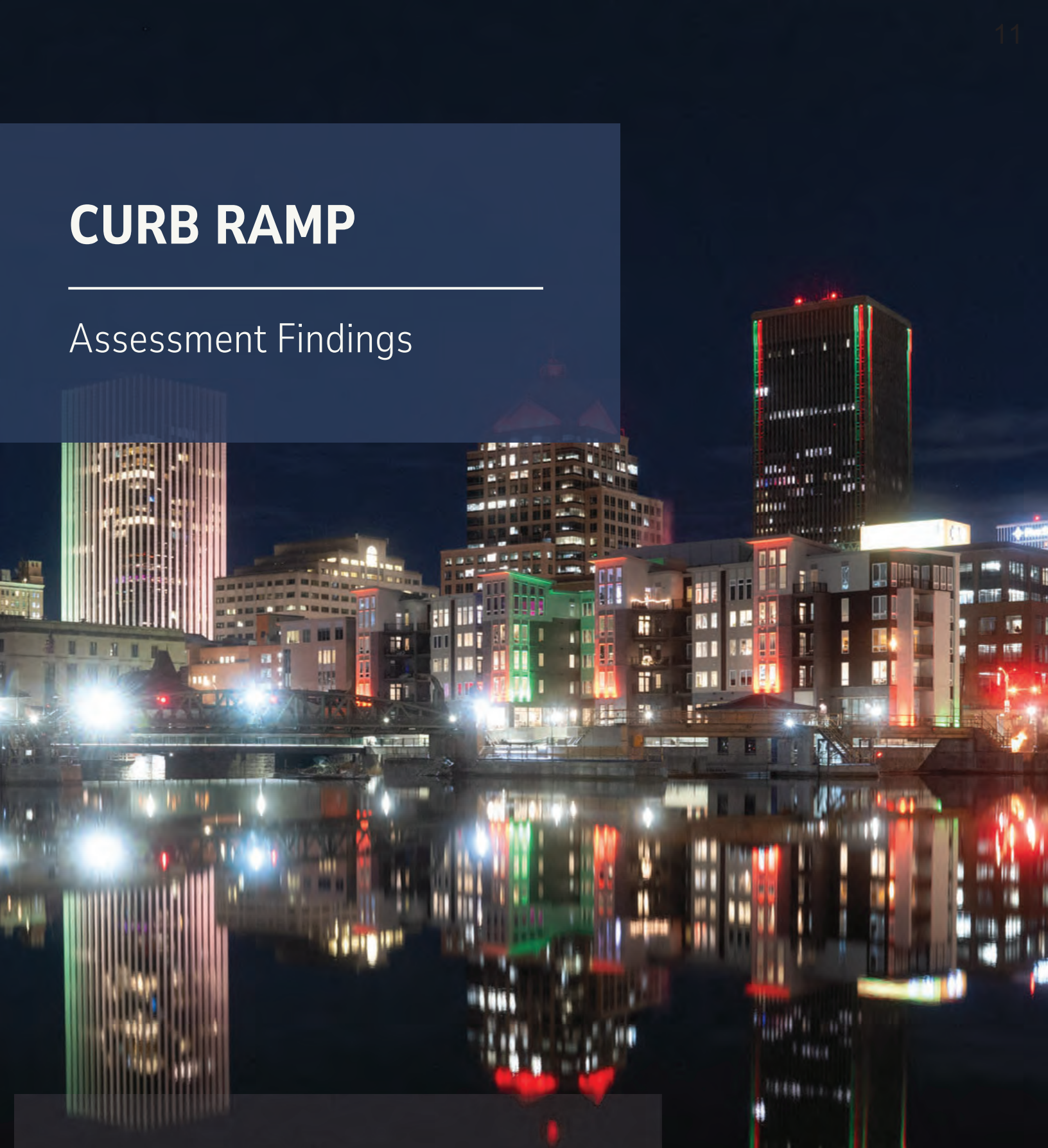
NYSDOT Prioritization Methodology

In addition to Precision Infrastructure Management's Prioritization Methodology, the New York State Department of Transportation's ADA prioritization matrix is also included in the GIS database of all ADA findings. The NYDOT's rating system is as follows:

- **Rating 1** – Not Applicable: A facility not considered to require accessibility, for example, limited-access highways.
- **Rating 2** – Not Accessible: Significant discontinuity such as steps, no ramps, more than 100 feet of unpaved walkway, heaving, vertical displacement, other severe distress, flooding, etc.
- **Rating 3** – Partially Accessible: Not designed to current standards, problems with geometry of sidewalks, ramps and landings, no detectable warnings, handrails, etc.
- **Rating 4** – Accessible: May need additional improvements, for example circuitous routes, insufficient width, etc.
- **Rating 5** – Fully Accessible: Designed to current standards, but reasonable accommodations may still be required for individual cases.

CURB RAMP

Assessment Findings



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Assessment Specification*

- Absence of Ramp (where required)
- No Compliant Detectable Warning Device
- Running Slope too Great
- Cross Slope too Great
- Flare Slope too Great
- Counter Slope too Great
- Width Less Than 4 ft.
- No Flush Transition
- No Compliant Landing
- Ponding at Curb Ramp within Pedestrian Access Route (PAR)
- Vertical Height Displacement (VHD) on Curb Ramp

**A detailed explanation for how curb ramps are assessed can be found in Appendix C.*

To capture a representative sample of the City of Rochester's sidewalk network and curb ramp inventory (approximately 13,196 curb ramps City-wide), Precision Infrastructure Management assessed 25% of the City's curb ramp assets. The City specifically asked PIM to focus on streets that have not been updated in at least 10 years. This sample likely shows more deficiencies than exist in the City as a whole.

Assessment Results

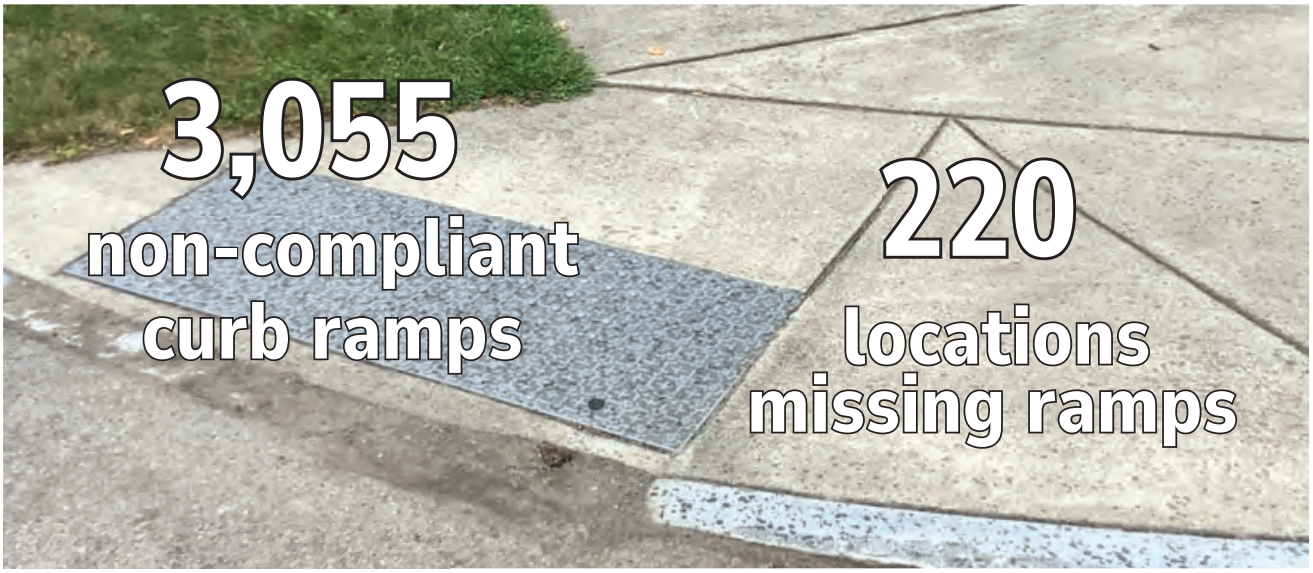
There were 3,299 curb ramps evaluated during the assessment. There were 220 locations requiring curb ramps that did not have them.

Priority Repairs

Attribute	Qty
No Curb Ramp Locations	220
Compliant Curb Ramps According to Utilized Specifications	244
Total Assessed Curb Ramps	3,299

Estimated Repair Costs

Curb Ramp Installation is projected to average $3,500 per location. A prioritized summary of repair costs is provided in the report Appendix A.



Examples of Curb Ramp Barriers

Examples with No Curb Ramp

PIM's Repair Prioritization Methodology - Curb Ramps

Curb Ramps were prioritized for repair according to the severity of their deficiencies as well as -- for the most severe cases -- proximity to residential disability ramps, public facilities, and parks.

Priority 1

Priority 1 includes curb ramps with any of the following barriers that are also within 1/16th mile of either a residential disability ramp, public facility like City hall or a Police Station, or park:

- No curb ramp
- Replacement required
- Inaccessible
- No compliant landing
- Width < 4 ft.
- Running slope > 12%
- Cross slope > 2.8%

1

Priority 2

Priority 2 includes curb ramps with any of the following barriers:

- No curb ramp
- Replacement required
- Inaccessible
- No compliant landing
- Width < 4 ft.
- Running slope > 12%
- Cross slope > 2.8%

2

Priority 3

Priority 3 includes curb ramps with any of the following barriers:

- Running slope between 8.3-12%
- Cross Slope between 2.1-2.8%

3

Priority 4

Priority 4 includes curb ramps with any of the following barriers:

- Non-compliant detectable warning
- No flush transition
- Flare slope > 10%
- Counter slope > 5%
- Trip hazards on curb ramp

4

The following table shows the breakdown of each priority outlined above.

Ratings	# of Ramps
Priority 1	270
Priority 2	2,349
Priority 3	199
Priority 4	457

Water Ponding in Accessible Routes

Water ponding at the bottom of curb ramps can create significant ADA barriers in the pedestrian access route, especially for those using wheelchairs. This accumulation of water can lead to slippery surfaces, increasing the risk of falls and injuries. For wheelchair users, water ponding presents a barrier that can make it difficult or even impossible to navigate the ramp. The wheels of a wheelchair can get stuck in the water, or slip on frozen ice, causing delays or forcing users to find alternative routes in the traffic lane, creating hazardous pedestrian experiences.

Additionally, standing water can cause structural damage over time, leading to uneven surfaces that further impede accessibility. Such conditions are ADA barriers and pose safety hazards, reducing the overall usability of pedestrian pathways for everyone.

Ponding at the bottom of a curb ramp is a separate remediation issue from retrofitting a curb ramp, as installing a new ramp does not necessarily eliminate ponding issues.

Assessment Results

53 locations had standing water or had signs of water ponding in Rochester. Additional locations may exist due to low levels of precipitation during the assessment.

Ponding locations also create sediment build-up and degradation of the accessible route.

Estimated Repair Costs

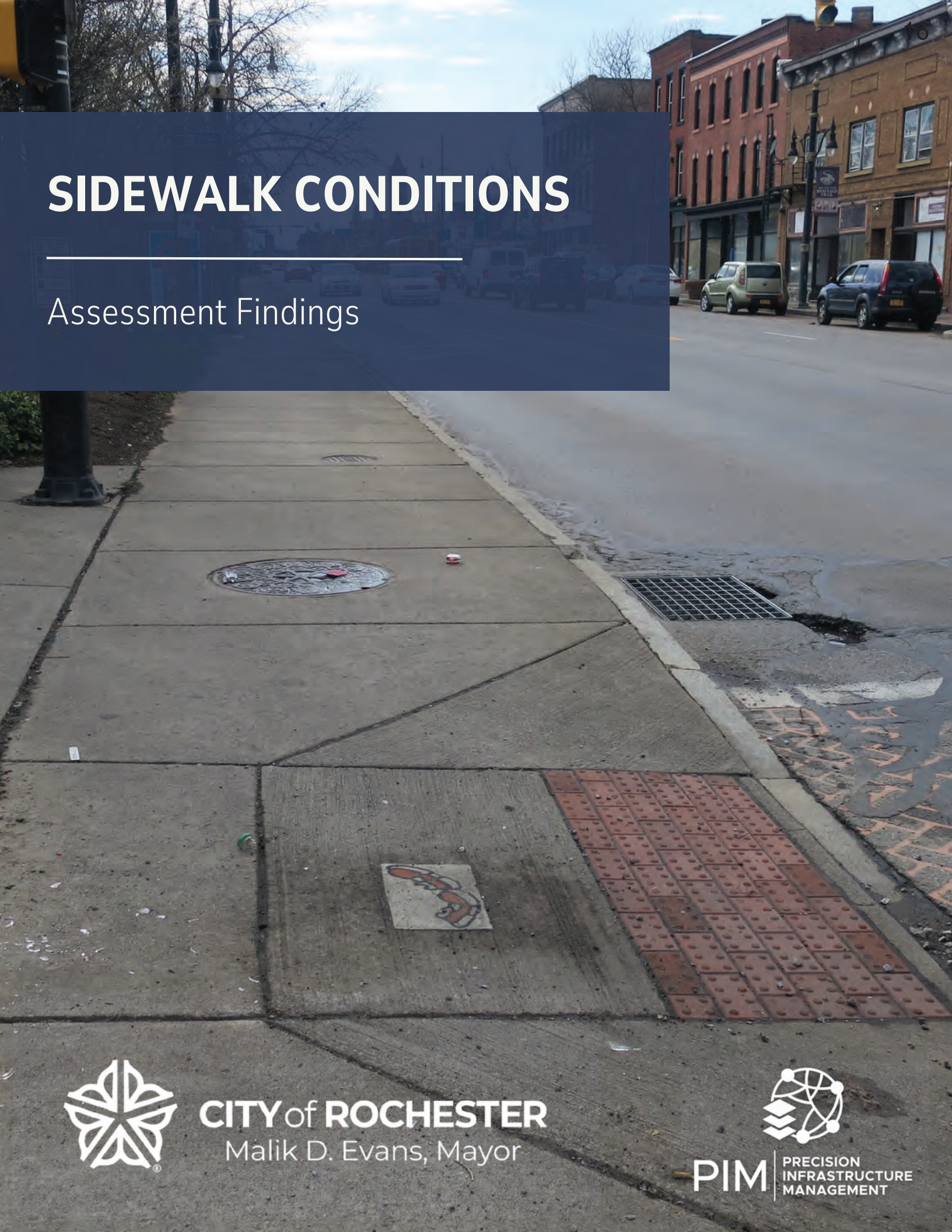
Remediation for ponding can cost between $2,500 and $15,000 depending on the severity of the ponding issue and whether alternative maintenance activity options are available.

Examples of Ponding

Caption: Curb ramps with ponding.

SIDEWALK CONDITIONS

Assessment Findings



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Vertical Height Displacements

Assessment Specification

Sidewalk Vertical Height Displacement (VHD) are where sidewalks deviate from flat to tripping hazards. They are rated by severity class:

- Small (.25 in. up to .49 in.)
- Medium (.5 in. up to .99 in.)
- Large (1.0 in. up to 2.5 in.)
- Demolish and Replace (>2.5 in. or > 4 cracks, significant spalling, unstable sections, large voids) [D&R]

Sidewalk Conditions Results

There were 57,568 sidewalk conditions (VHD and D&R locations) recorded during the assessment of 220 miles of sidewalk.

VHD and D&R Totals

VHD Small	**37,774**
VHD Medium	**12,057**
VHD Large	**4,067**
D & R	**3,670**

Estimated Repair Costs

VHD repairs are based on an average cost of $5 per square foot for remediation using an alternative maintenance activity like horizontal saw cutting.

PIM estimates the total cost of remediation for these D&R issues is $13 per square foot to construct new sidewalk.

Vertical Height Displacement Examples

SMALL (0.25" up to 0.49")

MEDIUM (0.5" up to 0.99")

LARGE (1.0" up to 2.5")

DEMOLISH AND REPLACE (Greater than 2.5")

Obstructions

Assessment Specification

The assessment looked at objects protruding within the ROW, of which a total of 1,961 were found during the assessment. The 1,961 obstructions are broken down into 3 fields shown below:

- Vegetative – Significant vegetation blocking the ROW.
- Ground – Physical barriers that obstruct the ROW. Examples include signposts, fire hydrants, and telephone poles.
- Vertical – Physical obstructions less than 80 inches off the ROW that create head clearance issues.

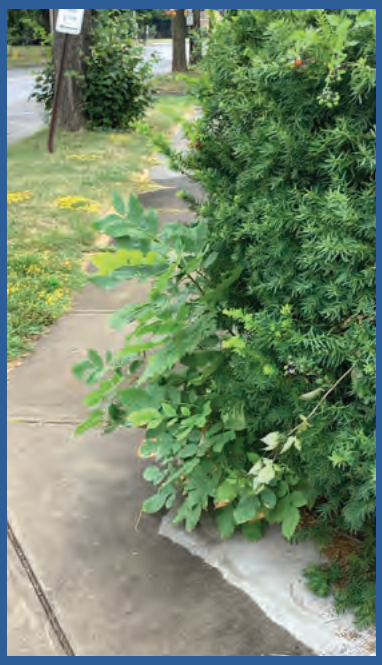
Assessment Results

Vegetative	**1,714**
Ground	**211**
Vertical	**36**

Estimated Repair Costs

Using data from previous projects, PIM estimates the cost of removing vegetative barriers at $150 per obstruction and $500 to mitigate ground/vertical obstructions. Costs for these items, especially ground obstructions, can vary widely depending on the nature of the obstruction.

EXAMPLES



Vegetative Obstruction

Vertical Obstruction

Ground Obstruction

Less Than 4' Passable Surface

Assessment Specification

PROWAG requires sidewalks to be 4' wide or greater to provide adequate space for walking/wheeling. The City of Rochester's standard is to build sidewalks 5' wide at a minimum.

Assessment Results

There were 12 sections of non-4' wide passable sidewalk surfaces identified during the assessment due either to less than 4' wide concrete pours or to erosion of the sidewalk resulting in a less than 4' passable surface.

Estimated Repair Costs

The only remedial action for sidewalk that is less than 4' by design or by degradation is to demolish and replace the existing sidewalk. PIM estimates the total cost of remediation for the less than 4' passable surface issues is $13 per square foot to construct new sidewalk.

EXAMPLES

Cross Slopes > 4% for more than 50 ft.

Assessment Specification

PIM collected locations on City sidewalk that had a greater than 4% cross slope for more than 50 ft. This collection item is intended to find the highest priority and most pervasive issues creating ADA barriers.

Assessment Results

There were 752 such locations encountered during the assessment.

Estimated Repair Costs

The only remedial action for extreme cross slope issues is to demolish and replace the existing sidewalk. PIM estimates the total cost of remediation for these cross slope issues is $13 per square foot to construct new sidewalk.

EXAMPLES

Driveway Cross Slopes

Assessment Specification

For many decades, driveways were designed in ways that are now considered non-compliant for the ROW. Typical design allowed homeowners or builders to cut through the existing sidewalk at slopes exceeding current cross slope requirements. PIM collected these barriers separately to allow Rochester flexibility in remediation strategies.

Assessment Results

There were 2,286 such locations encountered during the assessment.

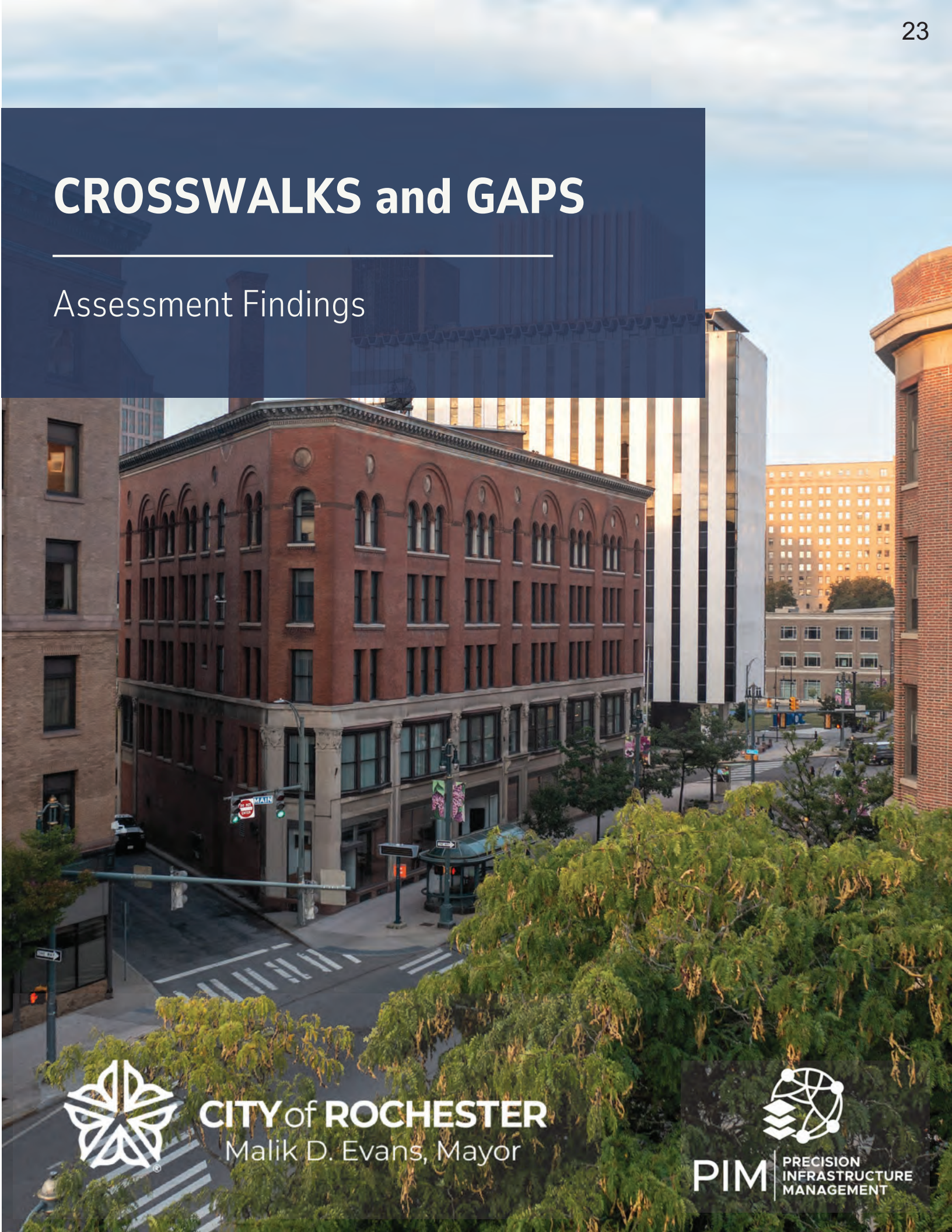
Estimated Repair Costs

The only remedial action for driveway cross slope issues is to demolish and replace the existing sidewalk. PIM estimates the total cost of remediation for these driveway cross slope issues is $13 per square foot to construct new sidewalk.

EXAMPLES

CROSSWALKS and GAPS

Assessment Findings



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Crosswalks - Running Slope

Assessment Specification

PIM assessed both ends of marked crosswalks within City ROW to determine if their slope was compliant with the 5% running slope maximum allowable under PROWAG at uncontrolled crosswalks. A running slope is the slope of a walking surface in the direction of travel.

Assessment Results

During the assessment, 56 crosswalks were found to have a running slope over 5%.

Estimated Repair Costs

The replacement/repair costs for these items vary widely due to the different nature of work required. PIM used $1,750 as an estimate for cost per location.

EXAMPLES

Sidewalk Gaps

Assessment Specification

In addition to ADA compliance items, Rochester requested that PIM flag sidewalk gaps. These are areas where additional sidewalk would improve the pedestrian experience in a City and generally increase accessibility for all residents and visitors.

Assessment Results

There were 2 such locations encountered during the assessment.

Estimated Repair Costs

PIM estimates it would cost the City of Rochester $9,750 to add the new sidewalk necessary to connect the sidewalk gaps flagged during PIM's assessment.

EXAMPLES

Transit Stops and Shelters

Assessment Specification

PIM assessed transit boarding and alighting areas within City ROW to determine compliance with ADA and PROWAG standards, evaluating dimensions, slope, connectivity to the pedestrian access route (PAR), and presence of shelters with required clear space.

PIM inspected each transit stop in accordance with PROWAG, assessing boarding and alighting areas, landing size, surface conditions, connectivity to the PAR, and the presence of compliant clear space for passenger shelters.

Assessment Results

There were 317 such locations encountered during the assessment. Of those locations, 219 did not meet PROWAG Standards.

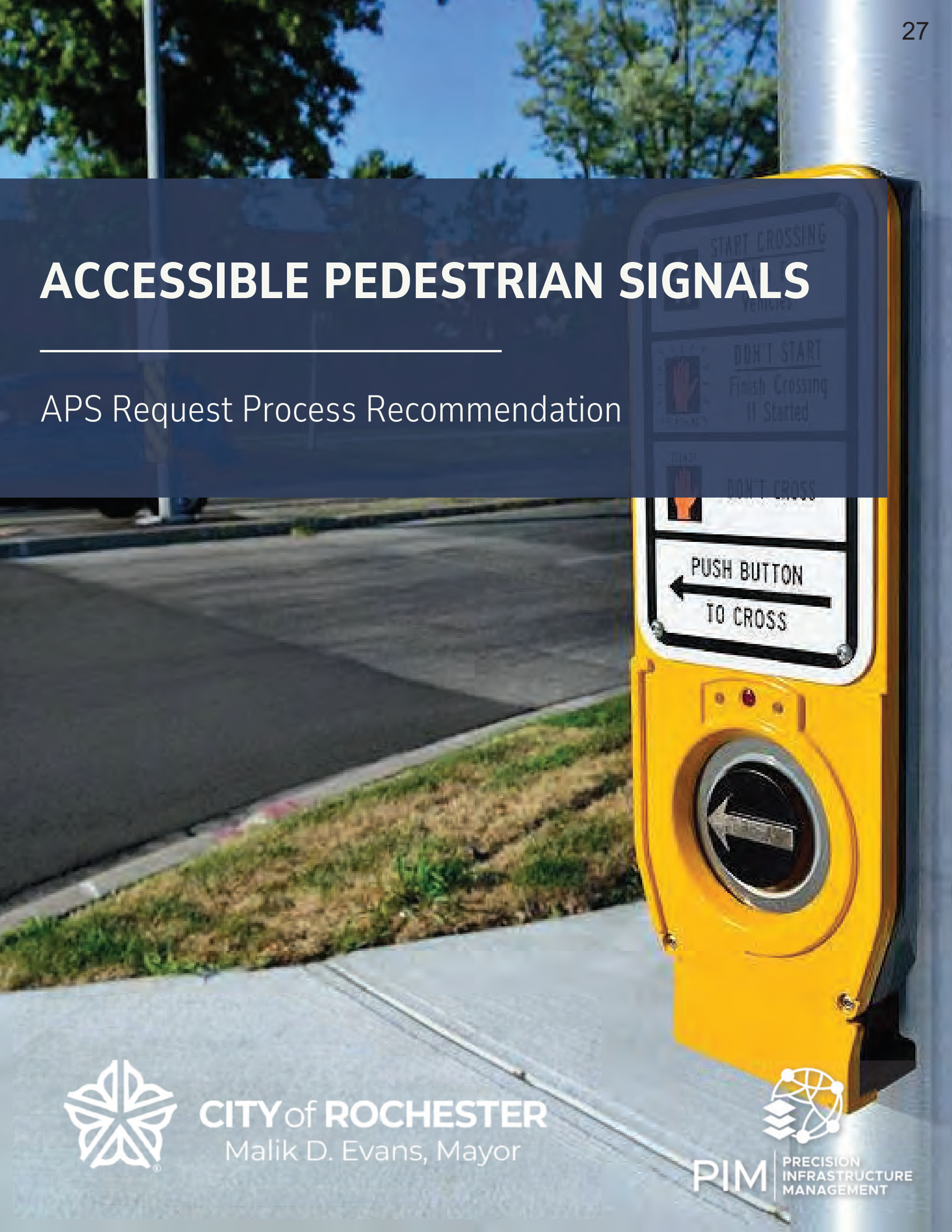
Estimated Repair Costs

PIM estimates it would cost the City of Rochester $416,000 to make the transit stops and shelters accessible.

EXAMPLES

ACCESSIBLE PEDESTRIAN SIGNALS

APS Request Process Recommendation



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Accessible Pedestrian Signals (APS)

Accessible Pedestrian Signals (APS) play a crucial role in ensuring the greater accessibility of public rights of way, which include sidewalks, pedestrian crossings, and other pathways used by the public to navigate urban environments. The accessibility of these areas is vital for creating inclusive communities where individuals with disabilities can move about independently and safely.

When APS May Be Required

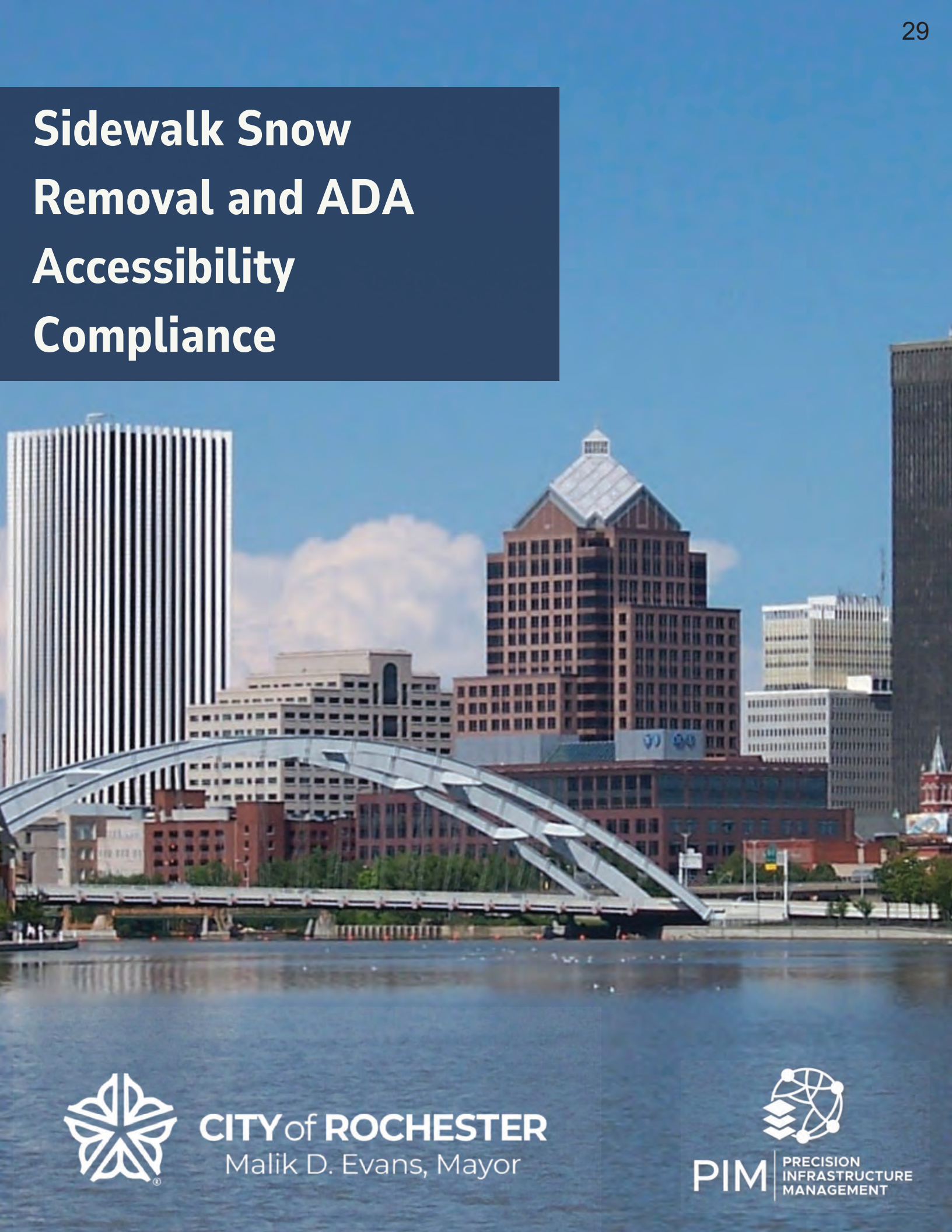
Notwithstanding PROWAG and its anticipated adoption by the US Department of Justice and the requirements associated with pedestrian traffic control devices, deployment of Accessible Pedestrian Signals may be required when a safety hazard has been identified or upon request by persons with disabilities.

Requesting APS Installation

The following outlines the recommended procedures for requesting Accessible Pedestrian Signals.

- Requests should be made through Rochester's Department of Environmental Services (DES) or 311.
- All APS installation requests will be reviewed by DES and forwarded to MCDOT for review.
- MCDOT should conduct a traffic study if the need and applicability are not obvious.
- MCDOT should document the process.
- The specific type of APS should be determined on the needs identified in the study and input from relevant organizations.

Sidewalk Snow Removal and ADA Accessibility Compliance



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Sidewalk Snow Removal and ADA Accessibility Compliance

The City of Rochester requires property owners to remove snow and ice from sidewalks adjacent to their property to help maintain safe and passable pedestrian routes within the public right-of-way. When snowfall exceeds four inches (4") in a single event, the City provides supplemental sidewalk snow plowing to assist in restoring pedestrian access along sidewalks throughout the City.

Maintaining clear sidewalks is critical to ensuring that pedestrian routes remain accessible to all members of the public, including individuals with disabilities. Under the Americans with Disabilities Act (ADA), public entities are required to maintain accessible features in operable working condition. The U.S. Department of Justice regulations implementing Title II of the ADA (28 CFR §35.133) require that facilities and features that are required to be accessible be maintained so that they remain usable by individuals with disabilities. Snow and ice accumulation can obstruct accessible routes, curb ramps, and other pedestrian facilities, creating barriers for individuals who use wheelchairs, mobility devices, or other assistive technologies.

Consistent with guidance from the U.S. Access Board, including the Public Rights-of-Way Accessibility Guidelines (PROWAG), pedestrian access routes within sidewalks should remain continuous, unobstructed, and usable by persons with disabilities. Accordingly, timely snow and ice removal is an important element of maintaining accessibility within the public right-of-way and supporting compliance with federal accessibility requirements.

While the City requires adjacent property owners to perform snow and ice removal from sidewalks, the City retains ultimate responsibility under Title II of the Americans with Disabilities Act to ensure that programs, services, and activities provided within the public right-of-way remain accessible. The U.S. Department of Justice has clarified that public entities cannot avoid ADA obligations by delegating maintenance responsibilities to private parties. Therefore, the City monitors compliance with local snow removal requirements and may undertake supplemental snow clearing or enforcement actions when necessary to maintain accessible pedestrian routes. These efforts help ensure that sidewalks, curb ramps, and pedestrian access routes remain usable by individuals with disabilities, consistent with 28 CFR §35.133 and guidance from the U.S. Access Board regarding accessible pedestrian routes within the public right-of-way.

APPENDIX A

Sidewalk Asset Management Plan

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Asset Management Plan (220 Surveyed Miles)

PIM has identified two asset management plan options for removing ADA barriers from the 220 mile assessment. Rochester can utilize horizontal saw cutting to remove vertical height displacements, which results in an ADA-compliant 1:12 ramp. Rochester can also utilize polyjacking and ponding remediation to address other select barriers by restoring compliant surface conditions and improving drainage. One incorporates alternative maintenance activities plus replacement of sidewalks to mitigate ADA barriers and one does not. The plans are broken down into 10, 25, and 50 year plans with varying degrees of costs, savings, and ADA barrier risk mitigation. High level assumptions are provided and details can be made available upon request. The total cost when not using AMA is $11 million dollars higher. **The City of Rochester currently spends over $3,000,000 annually to repair and upgrade sidewalks.**

Cost and Risk Abatement Utilizing Alternative Maintenance Activities: $25,520,850

10 Year Plan	25 Year Plan	50 Year Plan
$2,600,000/Year	$1,050,000/Year	$520,00/Year
55% of barriers remediated within the first 5 years.	21% of barriers remediated in the first 5 years.	11% of barriers remediated in the first 5 years.

Not Utilizing Alternative Maintenance Activities: $34,822,400

10 Year Plan	25 Year Plan	50 Year Plan
$3,500,000/Year	$1,400,000/Year	$700,000/Year
42% of barriers remediated in the first 5 years.	20% of barriers remediated in the first 5 years.	10% of barriers remediated in the first 5 years.

Asset Management Plan (880 Total Miles)

Budget projections were developed through a proportional extrapolation of observed repair costs within the sampled 25% of sidewalks. **The City of Rochester spends over $3,000,000 annually to repair and upgrade sidewalks.**

Cost and Risk Abatement Utilizing Alternative Maintenance Activities: $102,083,400

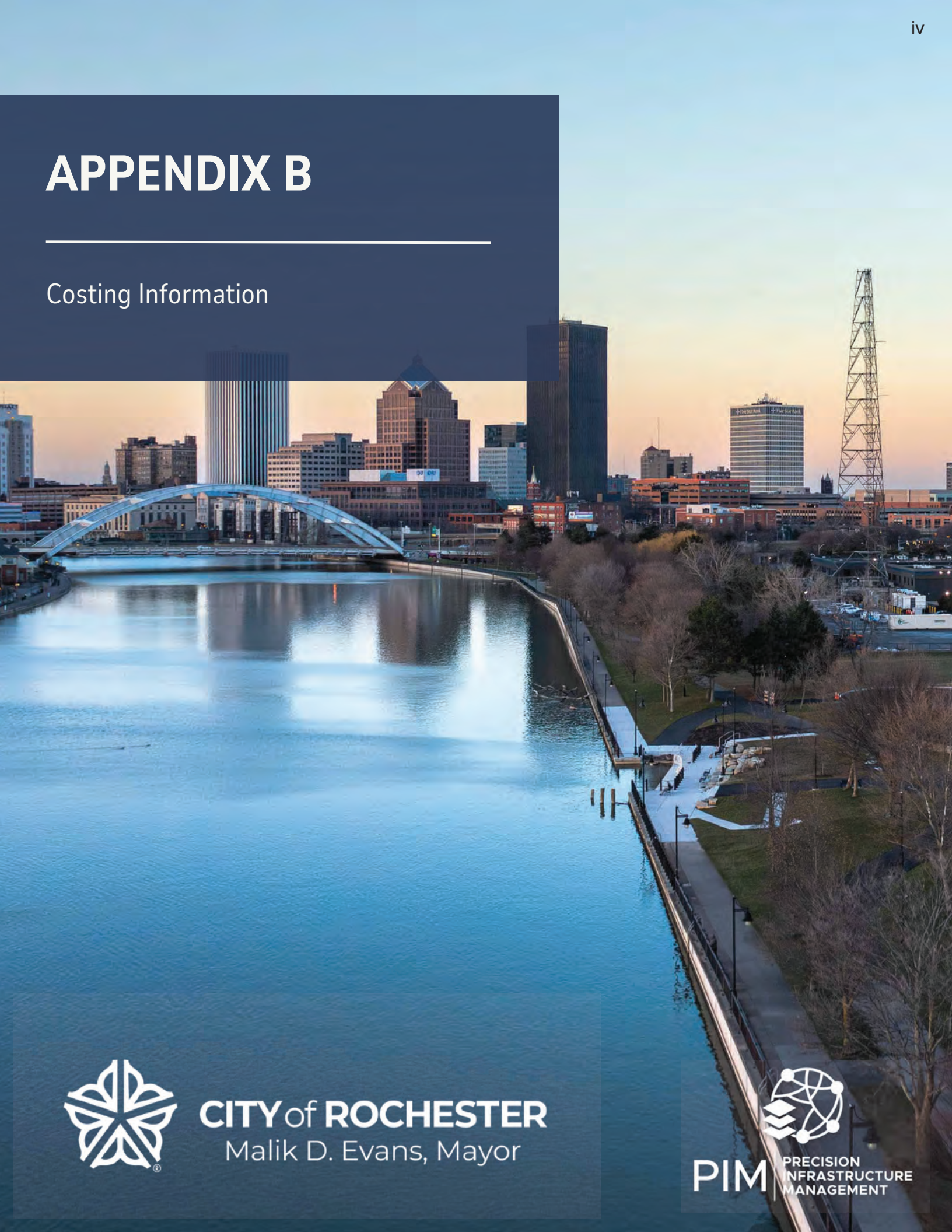
10 Year Plan	25 Year Plan	50 Year Plan
$10,200,000/Year	**$4,100,000/Year**	**$2,050,000/Year**
55% of barriers remediated within the first 5 years.	**21% of barriers remediated in the first 5 years.**	**10% of barriers remediated in the first 5 years.**

Not Utilizing Alternative Maintenance Activities: $139,289,600

10 Year Plan	25 Year Plan	50 Year Plan
$14,000,000/Year	**$5,600,000/Year**	**$2,800,000/Year**
42% of barriers remediated in the first 5 years.	**20% of barriers remediated in the first 5 years.**	**10% of barriers remediated in the first 5 years.**

APPENDIX B

Costing Information



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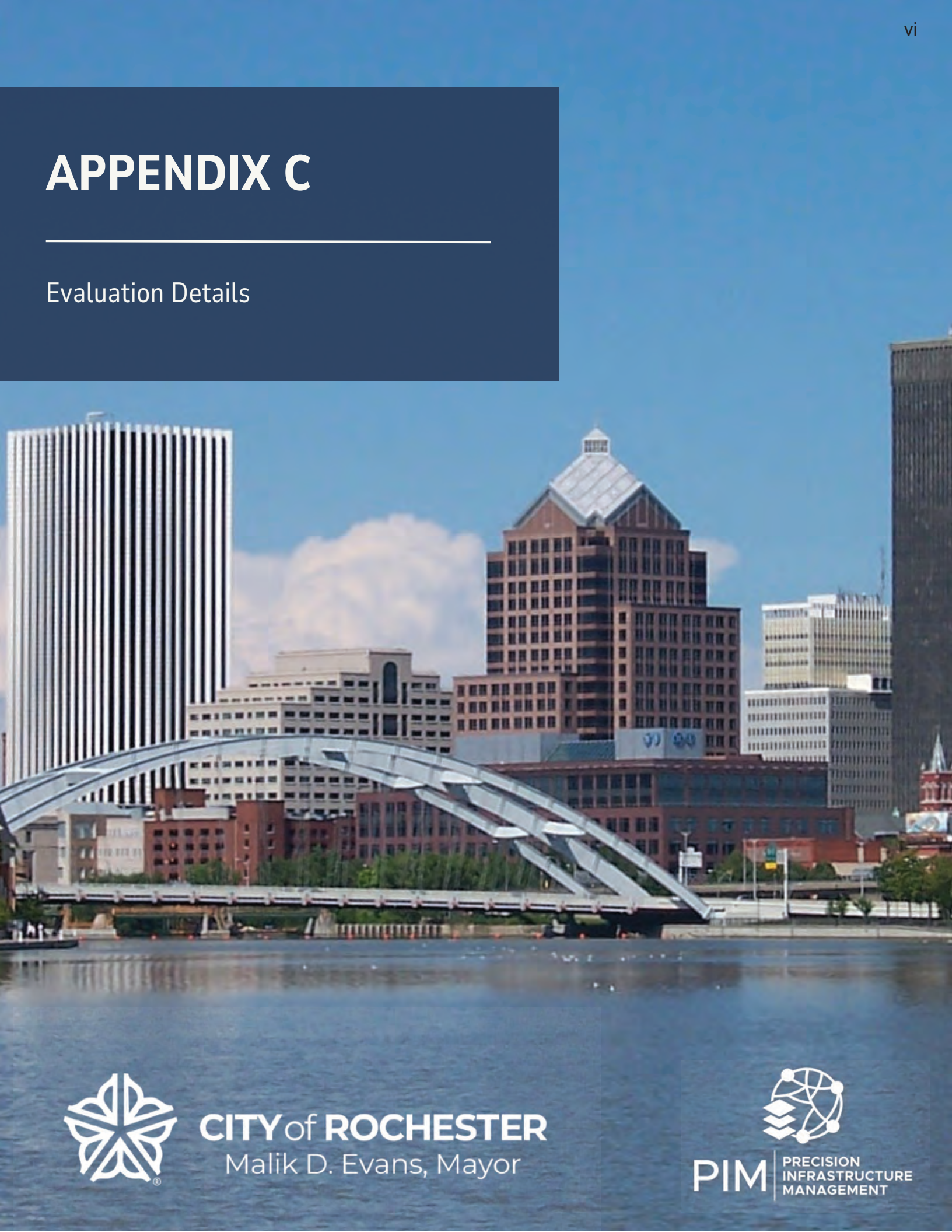
Costing Information

The following costing information was developed in collaboration with the City of Rochester using historical and region-specific cost data. The demolish and replace (D&R) rate is based off of rates found from past sidewalk replacement requests from the City of Rochester.

Item / Deficiency	Cost Assumption	Unit	Source
Sidewalk < 4 ft wide	$13 / SqFt	SqFt	**Rochester Historical D&R Rate**
Sidewalk Gaps	$13 / SqFt	SqFt	**Rochester Historical D&R Rate**
Driveway Cross Slope	$13 / SqFt	SqFt	**Rochester Historical D&R Rate**
General Cross Slope	$13 / SqFt	SqFt	**Rochester Historical D&R Rate**
D&R (Demolish and Replace)	$13 / SqFt	SqFt	**Rochester Historical D&R Rate**
Crosswalk Replacement	$1750 / Crosswalk	Each	**Historical PIM project data**
No Curb Ramp	$3500 / Ramp	Each	**PIM historical curb ramp bid averages**
Non-Compliant Curb Ramp	$3500 / Ramp	Each	**PIM historical curb ramp bid averages**
VHD (Vertical Height Displacement)	$5 / SqFt	SqFt	**PIM Saw Cutting Rate**

APPENDIX C

Evaluation Details



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Evaluation Details

To survey the selected 220 miles of sidewalk, Precision Infrastructure Management sent trained ADA surveyors to walk each mile. The Surveyors utilized an iPad, ArcGIS Field Maps, a Two-foot level, and Measuring tape to collect information on each ADA barrier that was found.

For Curb Ramps, the surveyors utilized a two-foot level and measuring tape to take measurements at every curb ramp that was in the 220 miles of ROW surveyed. For this, they took measurements of width of the curb ramp, if there was a flush transition between the gutter pan and curb ramp lip, the running slope, cross slope, flare slope (if the ramp had flares), the counter slope, if there was the 4x4 ft landing space, if there were any trip hazards on the curb ramp, and if the detectable warning complies with the scope of the project's requirement for detectable warnings.

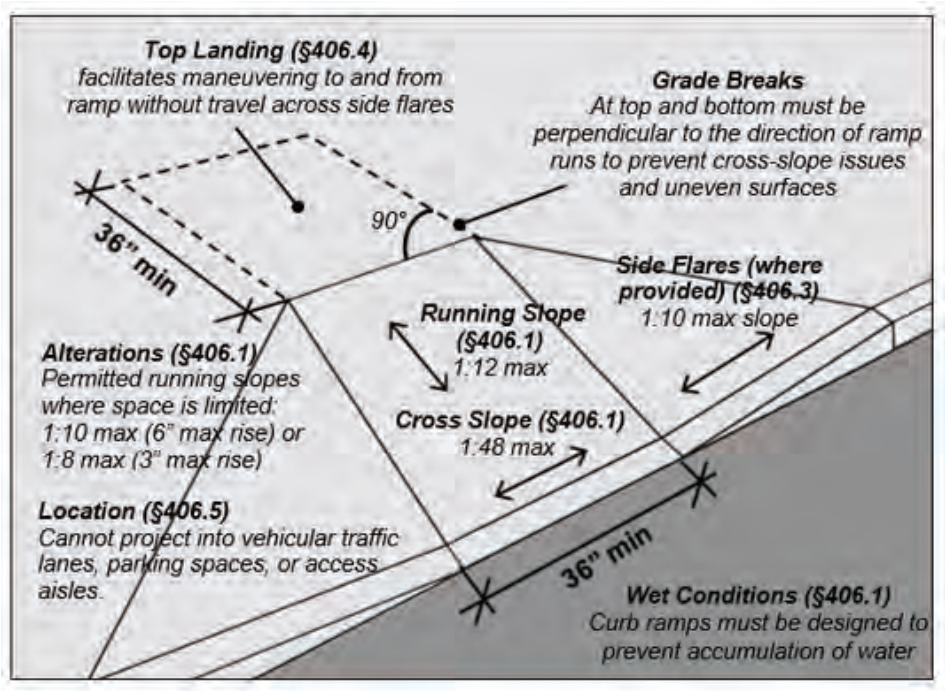


Diagram of Curb Ramp showing the different slopes and segments of a curb ramp. Provided by the US Access Board

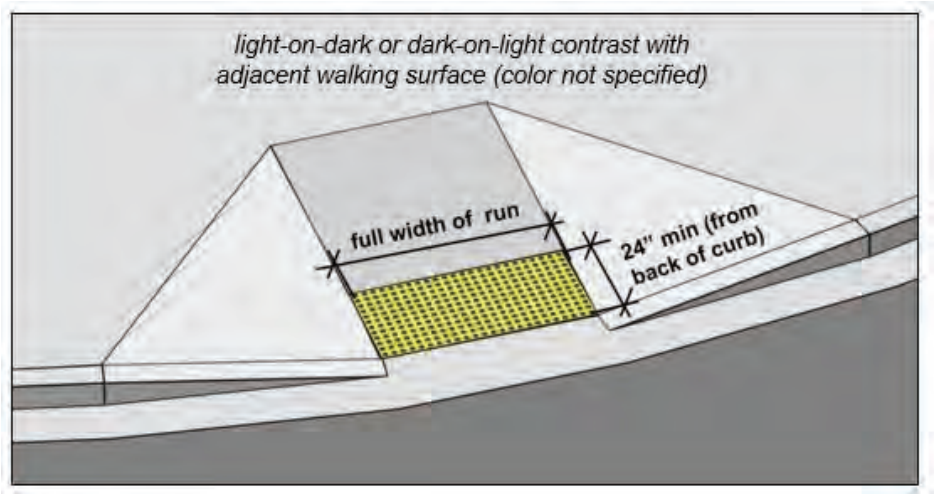
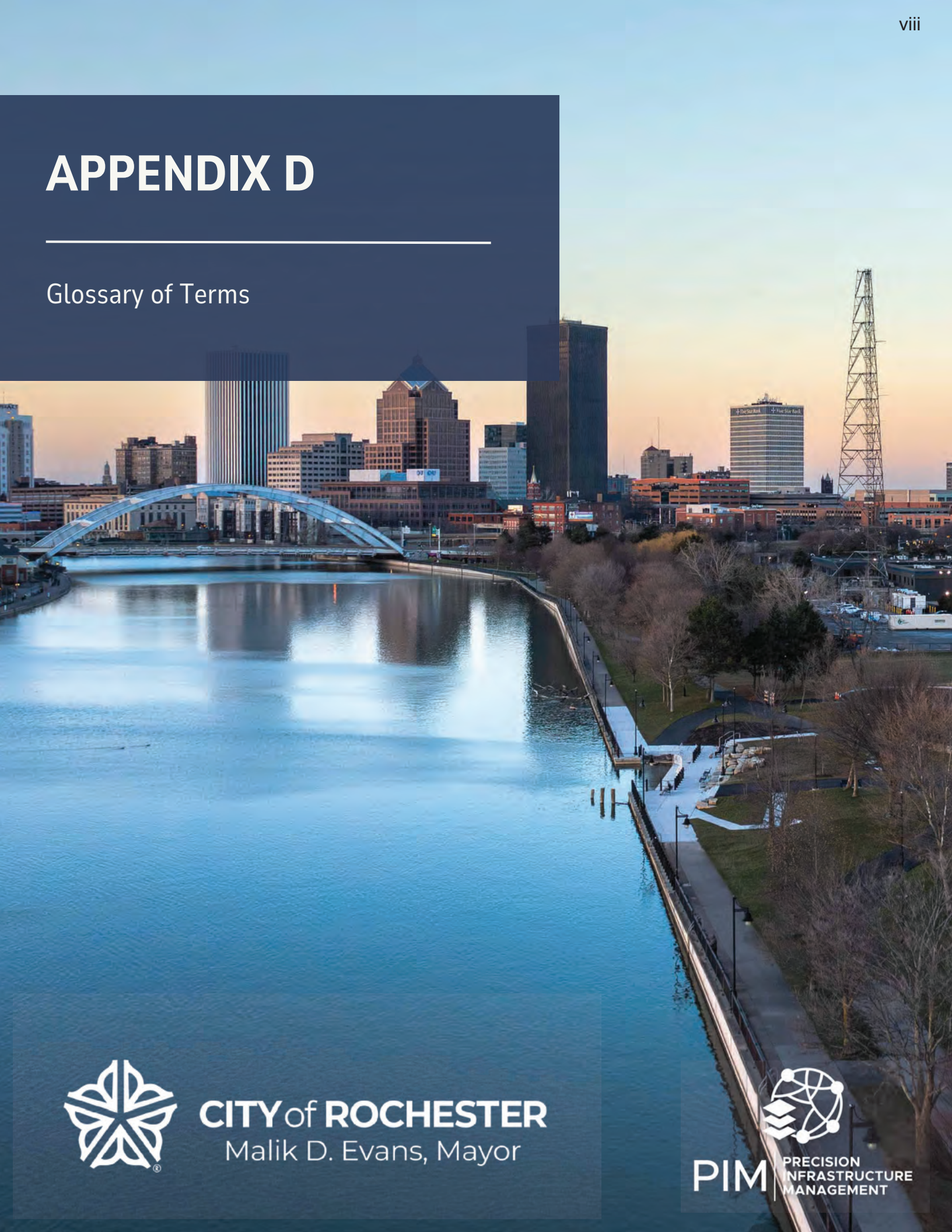


Diagram of Curb Ramp showing a compliant detectable warning. Provided by the US Access Board

APPENDIX D

Glossary of Terms



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PIM | PRECISION INFRASTRUCTURE MANAGEMENT

Glossary of Terms

Americans with Disabilities Act (ADA): Civil rights law enacted in 1990 that prohibits discrimination against individuals with disabilities in all areas of public life, including employment, transportation, public accommodations, and government services.

Alternative Maintenance Activities (AMA): Cost-effective and less invasive methods for repairing or remediating ADA barriers, such as grinding down small vertical displacements instead of fully replacing sidewalk panels.

Curb Ramp: A ramp that allows individuals to transition from a sidewalk to the street, facilitating access for wheelchair users, people with strollers, and others. ADA-compliant curb ramps have specific slope, width, and surface requirements to ensure safety and usability.

Cross Slope: The slope of a sidewalk or other walking surface perpendicular to the direction of travel. For accessibility, the cross slope must not exceed a specific gradient, typically 2%, to ensure that it is safe for all users, including those who use mobility devices.

Obstruction: Any object that blocks or impedes passage within the public right of way. Examples include signposts, fire hydrants, or vegetation that encroaches on the sidewalk. These obstructions must be mitigated to ensure clear and accessible pedestrian routes.

Ponding: The accumulation of water on pedestrian routes, such as sidewalks or curb ramps, that creates a barrier to accessibility. Ponding can make it difficult or impossible for wheelchair users to navigate, and it can also cause slippery conditions that are hazardous to all pedestrians.

Glossary of Terms

PROWAG (Public Rights-of-Way Accessibility Guidelines): Guidelines developed by the U.S. Access Board that provide design standards to ensure accessibility in public rights of way, such as sidewalks, crosswalks, and pedestrian signals. PROWAG aims to ensure that these areas are accessible to all individuals, including those with disabilities.

Running Slope: The slope of a walking surface in the direction of travel. For sidewalks and curb ramps, the running slope must meet specific ADA standards to be considered accessible, usually not exceeding a slope of 5% for pedestrian pathways.

Self-Assessment: A process required under Title II of the ADA, where public entities evaluate their facilities and public rights of way to identify and address barriers to accessibility. The self-assessment serves as a foundational step in developing transition plans and ensuring compliance with ADA requirements.

Sidewalk Gap: A missing section of sidewalk within a pedestrian route. Gaps can significantly hinder accessibility, especially for individuals with disabilities, by forcing them to find alternative, and potentially unsafe, routes.

Vertical Height Displacement (VHD): A condition where the vertical height difference between adjacent sidewalk panels exceeds the allowable limit, creating a barrier to accessibility. Typically, a VHD of 0.25 inches or greater is considered an obstacle that requires remediation under ADA standards.