

City of Duluth, Georgia
Americans with Disabilities Act
(ADA)
Transition Plan
November 2023



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Introduction

City Background

In 1821, Evan Howell and his family moved from North Carolina to the newly created Gwinnett County. He built a home and settled in the fertile bottom lands of the Chattahoochee River, an area previously inhabited by the Creek and Cherokee Indians. Like Howell, other pioneers began to flow into Gwinnett, and Indian Woodlands began to grow populated with crude cabins and rich farms. In 1833 Howell applied for permission to the Interior Court to construct a road across his land from the Chattahoochee River. The Court agreed with Howell that such a road would “promote the public good by affording additional facilities to travelers, passengers, and others.” The new road joined the road from Lawrenceville. The residents christened the intersection Howell’s Cross Roads. The name stuck for several decades until 1871 when the railroad came to town. After the railroad was completed, Evan Howell, a grandson of the early settler, was invited to dedicate the new train station and name the new town. So, Howell’s Cross Roads was given the name Duluth. Around the turn of the Century, Duluth had farmers coming from surrounding counties to have their cotton harvests ginned and shipped. During those days the streets of downtown Duluth were so covered with bales of cotton overflowing from the warehouses that the main streets were virtually impassable. While they were in the town, families stocked up on store bought goods and supplies from local merchants. At one time, Duluth could boast of three cotton gins, 10 cotton buyers, several warehouses, three mule trading barns, and three blacksmith shops. While much of the small-town character of this old cotton city remains, the hand of progress has led Duluth boldly and swiftly into the present.

Today, the City of Duluth is located in Gwinnett County, Georgia, and has a total area of 9.8 square miles. As of 2023, the population of Duluth was estimated to be 31,808. The City’s government is comprised of an elected Mayor and City Council. Nancy Harris has served as the Mayor of Duluth, Georgia since 2007. The City Manager is James Riker, who is tasked to independently organize and manage the daily operations of Duluth’s City government in accordance with local ordinances, laws and policies prescribed by the elected officials.

Transition Plan Need and Purpose

The [Americans with Disabilities Act \(ADA\)](#) 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

Title II of ADA pertains to the programs, activities and services provided by public entities. The City of Duluth must comply with this section of the Act, as it specifically applies to public service agencies. Title II of ADA states that “no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services,

programs, or activities of a public entity, or be subjected to discrimination by any such entity.” ([42 USC Sec. 12132](#); [28 CFR Sec. 35.130](#))

As required by Title II of ADA ([28 CFR Part 35 Sec. 35.105 and Sec. 35.150](#)), the City of Duluth has conducted a self-evaluation of its services, programs, activities, and facilities on public property and within public rights-of-way; and has developed this Transition Plan detailing the methods to be used to ensure compliance with ADA accessibility requirements.

ADA and its Relationship to Other Laws

Title II of ADA is companion legislation to two previous federal statutes and regulations: the [Architectural Barriers Act \(ABA\) of 1968](#) and [Section 504 of the Rehabilitation Act of 1973](#).

The Architectural Barriers Act of 1968 is a Federal law that requires facilities designed, built, altered or leased with Federal funds to be accessible. The Architectural Barriers Act marks one of the first efforts to ensure access to the built environment.

Section 504 of the Rehabilitation Act of 1973 is a Federal law that protects qualified individuals from discrimination based on their disability. The nondiscrimination requirements of the law apply to employers and organizations that receive financial assistance from any Federal department or agency. Title II of ADA extended this coverage to all state and local government entities, regardless of whether they receive federal funding or not.

Agency Requirements

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

- Must operate their programs so that, when viewed in their entirety, the programs are accessible to and useable by individuals with disabilities [[28 CFR Sec. 35.150](#)].
- May not refuse to allow a person with a disability to participate in a service, program or activity simply because the person has a disability [[28 CFR Sec. 35.130 \(a\)](#)].
- Must make reasonable modifications in policies, practices and procedures that deny equal access to individuals with disabilities unless a fundamental alteration in the program would result [[28 CFR Sec. 35.130\(b\)\(7\)](#)].
- May not provide services or benefits to individuals with disabilities through programs that are separate or different unless the separate or different measures are necessary to ensure that benefits and services are equally effective [[28 CFR Sec. 35.130\(b\)\(iv\) & \(d\)](#)].
- Must take appropriate steps to ensure that communications with applicants, participants and members of the public with disabilities are as effective as communications with others [[29 CFR Sec. 35.160\(a\)](#)].
- 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\(a\)](#)].

- Must establish a grievance procedure. Public entities must adopt and publish grievance procedures providing for prompt and equitable resolution of complaints [[28 CFR Sec. 35.107\(b\)](#)]. This requirement provides for a timely resolution of all problems or conflicts related to ADA compliance before they escalate to litigation and/or the federal complaint process.

Designation of Responsibility

The City of Duluth has designated the following person to serve as ADA Transition Plan Implementation Coordinator, to monitor the City's progress and manage review and updates of this document:

Primary Contact Name: Margie Pozin Job Title: Dir. of Community Development & Engineering
Contact information is provided in Appendix C.

Training is an important tool for ensuring compliance with ADA requirements. The ADA Coordinator will identify resources and opportunities for agency employees at various levels to receive ADA-related training appropriate to their job functions.

Self-Evaluation

Overview

The City of Duluth is required, under Title II of the Americans with Disabilities Act (ADA) and 28CFR35.105, to perform a self-evaluation of its current transportation infrastructure policies, practices, and programs. This self-evaluation will identify what policies and practices impact accessibility and examine how the City implements these policies. The goal of the self-evaluation is to verify that, in implementing the City policies and practices, the department is providing accessibility and not adversely affecting the full participation of individuals with disabilities.

This self-evaluation also examines the condition of the City's pedestrian access routes and identifies the potential need for pedestrian infrastructure improvements. This will include the sidewalks, curb ramps, and bicycle/pedestrian trails located within the city limits of Duluth. Any barriers to accessibility identified in the self-evaluation and the remedy to the identified barrier are set out in this transition plan.

The transition plan is intended to be an evolving plan. As such, the City of Duluth will annually review this plan and ensure that it is up to date with current standards. The plan will also incorporate improvements completed on the ADA features.

Process & Findings

In 2020 and 2021, Keck & Wood, Inc., on behalf of the City of Duluth, and city employees completed a self-evaluation of the city's facilities and parks with regard to accessibility. In July 2023, the findings were updated to account for ADA improvements the City had made since the original inspections. Detailed inventories and findings from the reviews are provided in Appendix E, under the headings Building Facilities (E-1) and Pedestrian Facilities (E-2).

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. The following sections in the Appendix provide a summary of improvements that have already been made, and obstacles that the City plans to address as part of this Transition Plan.

Public Facilities and Parks

The City of Duluth is responsible for the following public facilities and parks:

- Facility 1 – City Hall (3167 Main Street, Duluth, Georgia 30096)
- Facility 2– Public Works Facility (2540 Chattahoochee Drive, Duluth, GA 30096)
- Facility 3– Public Safety Center (3276 Buford Highway, Duluth, GA 30096)
- Facility 4– Bunten Road Park Recreation Center (3180 Bunten Road Duluth, GA 30096)
- Facility 5– Red Clay Theater (3116 Main Street, Duluth, GA 30096)
- Facility 6– Duluth Community Center at WP Jones Park (3770 Pleasant Hill Road, Duluth, GA 30096)
- Facility 7– Festival Center (3142 Hill Street, Duluth, GA 30096)
- Park 1– Scott Hudgens Park (6325 River Green Parkway, Duluth, GA 30096)
- Park 2– Roger’s Bridge Park (4791 Roger’s Bridge Park, Duluth, GA 30096)
- Park 3– Tennis Courts at WP Jones Park (3620 Pleasant Hill Road Church Street, Duluth, GA 30096)
- Park 4– Church Street Park (Church Street, Duluth, GA 30096)
- Park 5– Taylor Park (3147 Main Street, Duluth, GA 30096)
- Park 6– Town Green (3142 Hill Street NW, Duluth, GA 30096)
- Park 7– Willbrooke Trail (3545 McClure Woods Drive, Duluth, GA 30096)

The City has conducted a detailed accessibility evaluation of each of its building facilities, and related parking lots/areas, based on the [ADA Checklist for Existing Facilities](#) publication. The findings from this evaluation are provided in Appendix E-1. The accessibility barriers/issues identified as currently existing have been ranked in order of priority for improvement.

Improvement Schedule

The City of Duluth has set the following schedule goals for improving the accessibility of its buildings and public facilities within the City jurisdiction:

- After 10 years, 100% of accessibility features that were constructed after January 26, 1991, will be ADA compliant.
- After 20 years, 80% of accessibility features within the priority areas identified by the City staff will be ADA compliant.
- After 30 years, 80% of accessibility features within the jurisdiction of the City will be ADA compliant.

Pedestrian Facilities / Public Rights-of-Way

As part of the self-evaluation process, the City of Duluth has conducted an inventory and evaluation of pedestrian facilities within its public rights-of-way, which consist of the following:

- Sidewalks within the city limits of Duluth (approximately 55 miles)
- Curb ramps within the city limits of Duluth
- Crosswalks within the city limits of Duluth
- Traffic control signals within the city limits of Duluth

A detailed evaluation of these facilities with regard to accessibility compliance is provided in Appendix E-2, and will be updated annually.

Improvement Schedule

The City of Duluth has set the following schedule goals for improving the accessibility of its pedestrian facilities within the City jurisdiction:

- After 10 years, 100% of accessibility features that were constructed after January 26, 1991, will be ADA compliant.
- After 20 years, 80% of accessibility features within the priority areas identified by the City staff will be ADA compliant.
- After 30 years, 80% of accessibility features within the jurisdiction of the City will be ADA compliant.

This year, the City is also developing a 5-year plan for the review and removal of trip hazards on sidewalks.

Methodology

The City of Duluth will utilize two methods for upgrading pedestrian facilities to current ADA standards. The first and most comprehensive method is through scheduled street and utility improvement projects. All pedestrian facilities impacted by these projects will be upgraded to current ADA accessibility standards.

The second method is through specific sidewalk and ADA accessibility improvement projects that are identified individually. These projects will be incorporated into the Capital Improvement Program (CIP) on a case-by-case basis as determined by the City of Duluth staff.

The City of Duluth has pursued and utilized several funding methods to install ADA improvements, which included the City's General Fund, Special Purpose Local Option Sales Tax (SPLOST), Local Maintenance & Improvement Grant (LMIG) and Livable Centers Initiative (LCI) program. The City will continue to pursue a variety of funding methods in order to achieve ADA compliance within the City's limits.

Policy

The City of Duluth's goal is to continue to provide accessible pedestrian design features as part of its capital improvement projects. The City has adopted ADA design standards and procedures as listed in Appendix A. These standards and procedures will be kept up-to-date with nationwide and local best management practices.

The City will consider and respond to all accessibility improvement requests. All accessibility improvements that are deemed reasonable will be scheduled consistent with transportation priorities. The City will coordinate with external agencies to ensure that all new or altered pedestrian facilities within the City jurisdiction are ADA compliant to the maximum extent feasible.

Maintenance of pedestrian facilities within the public rights-of-way will continue to follow the policies set forth by the City. Examples of typical maintenance items relating to accessibility include: sidewalk repairs, renewal of crosswalk markings, and ADA ramp maintenance. Detailed information is provided in Appendix E-2.

Requests for accessibility improvements can be submitted to the ADA Transition Plan Implementation Coordinator. Contact information is provided in Appendix C.

Priority Areas

The City of Duluth has identified specific locations as priority areas for planned accessibility improvement projects. These areas have been selected due to their proximity to specific land uses. This includes areas within the vicinity of public facilities, such as schools, government offices, parks and recreational facilities, public transit facilities, and medical facilities.

1. Areas within proximity of schools within the city's limits
2. Areas within proximity of city facilities (ex: City Hall)
3. Areas within proximity of city parks
4. Pedestrian facilities within residential areas
5. Pedestrian facilities within commercial/industrial areas

Additional priority will be given to any location where an improvement project or alteration was constructed after January 26, 1991, and accessibility features were omitted.

External Agency Coordination

Several agencies are responsible for pedestrian facilities within the jurisdiction of the City of Duluth. The City will coordinate with those agencies (GDOT) to assist with identifying and facilitating elimination of accessibility barriers along their routes.

Public Outreach

The City of Duluth 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 within the jurisdiction of the City of Duluth.

A draft of the ADA Transition Plan has been posted to the City's website for public review and comments.

Public Notice of ADA Requirements and Grievance Procedure

Under the Americans with Disabilities Act, each agency is required to publish its responsibilities with regard to ADA compliance. A draft of this public notice is provided in Appendix B.

If users of the City of Duluth facilities and services believe the City 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 has developed a grievance procedure for the purpose of the prompt and equitable resolution of citizens' complaints or concerns. This grievance procedure is outlined in Appendix B.

Progress Monitoring and Transition Plan Management

This Transition Plan is considered to be a living document that will continue to be updated as conditions within the City evolve. The initial schedule is to formally review the complete document (main body and appendices) at least once per year to identify any need for updates. Updates to the appendices or attachments may be made more frequently as needed. Any substantive updates to the main body of this document will include a public comment period, which will take place from September 1 through September 31 of each year, to continue the City's public outreach efforts. During the public comment period, citizens can reach out to the City's ADA Transition Plan Implementation Coordinator (contact information is in Appendix C). At the end of the public comment period, the comments will be reviewed, and the ADA Transition Plan will be revised as necessary.

The City recognizes that ADA compliance is an ongoing responsibility which will require monitoring to identify future accessibility issues that may be encountered. For example, facilities that currently meet ADA requirements could fall out of compliance in the future due to factors such as damage, disrepair, or changes within public rights-of-way that could create new accessibility obstacles. Therefore, the ADA Transition Plan Implementation Coordinator will establish an ongoing monitoring/inspection process to ensure that facilities continue to comply with ADA requirements. Agency employees will also be encouraged to report any accessibility concerns or deficiencies that are identified.

Appendices

- A. Agency ADA Design Standards and Improvement/Compliance Procedures**
- B. Public Notice of ADA Requirements and Grievance Procedure**
- C. ADA Transition Plan Coordinator Contact Information**
- D. Glossary of Terms**
- E. Self-Evaluation**
 - E-1. Public Facilities and Parks**
 - E-2. Pedestrian Facilities / Public Rights-of-Way**

Appendix A – Agency ADA Design Standards and Improvement/Compliance Procedures

Design Improvements and Compliance Procedures

Intersection Corners

Curb ramps will attempt to be constructed or upgraded to achieve compliance within all capital improvement projects. There may be limitations which make it technically infeasible for an intersection corner to achieve full accessibility within the scope of any project. Those limitations will be noted and those intersection corners will remain on the transition plan. As future projects or opportunities arise, those intersection corners shall continue to be incorporated into future work. Regardless on if full compliance can be achieved or not, each intersection corner shall be made as compliant as possible in accordance with the judgment of City staff.

Sidewalks / Trails

Sidewalks and trails will attempt to be constructed or upgraded to achieve compliance within all capital improvement projects. There may be limitations which make it technically infeasible for segments of sidewalks or trails to achieve full accessibility within the scope of any project. Those limitations will be noted and those segments will remain on the transition plan. As future projects or opportunities arise, those segments shall continue to be incorporated into future work. Regardless on if full compliance can be achieved or not, every sidewalk or trail shall be made as compliant as possible in accordance with the judgment of City staff.

Traffic Control Signals

The City will coordinate with the County to attempt to have traffic control signals be constructed or upgraded to achieve compliance within all capital improvement projects. There may be limitations which make it technically infeasible for individual traffic control signal locations to achieve full accessibility within the scope of any project. Those limitations will be noted and those locations will remain on the transition plan. As future projects or opportunities arise, those locations shall continue to be incorporated into future work. Regardless on if full compliance can be achieved or not, each traffic signal control location shall be made as compliant as possible in accordance with the judgment of City staff.

Other policies, practices and programs

Policies, practices and programs not identified in this document will follow the applicable ADA standards.

Design Standards

The City of Duluth complies with the design standards established by the Georgia Department of Transportation (GDOT).

Appendix B – Public Notice of ADA Requirements and Grievance Procedure

As required by the Americans with Disabilities Act, the City of Duluth has posted the following notice outlining its responsibilities with regard to ADA compliance.

Public Notice

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990, the City of Duluth will not discriminate against qualified individuals on the basis of disability in the City's services, programs or activities.

Employment: The City of Duluth does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under Title I of the Americans with Disabilities Act (ADA).

Effective Communication: The City will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in the City's programs, services and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing or vision impairments.

Modifications to Policies and Procedures: The City will make all reasonable modifications to policies and procedures to ensure that people with disabilities have an equal opportunity to enjoy all City programs, services and activities. For example, individuals with service animals are welcomed in City offices, even where pets are generally prohibited. Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a City program, service or activity, should contact the office of the ADA Coordinator as soon as possible but no later than 48 hours before the scheduled event.

The ADA does not require the City to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden. The City will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy, such as retrieving items from locations that are open to the public but are not accessible to persons who use wheelchairs.

Grievance Procedure

This grievance procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 (ADA). It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of service, activities, programs, or benefits by the City of Duluth Mayor and Council. The City of Duluth Personnel Policies and Procedures govern employment related complaints of disability discrimination. The application form is included. Grievances should be filed with the ADA Coordinator at:

City of Duluth
3167 Main Street
Duluth, Georgia 30096

The Grievance Procedure consists of the following:

1. A complaint should be filed in writing (but can be submitted in alternate format due to the needs on an individual's disability), containing the name and address of the person filing it, and briefly describing the alleged violation of the regulations or discriminatory act.
2. A complaint should be filed within 30 calendar day after the complainant becomes aware of the alleged violation. Processing of allegations of discrimination, which occurred before this grievance procedure was in place, will be considered on a case-by-case basis.
3. An investigation, as may be appropriate, will follow filing of the complaint and will be conducted by the City's ADA Coordinator. These rules contemplate informal, but thorough investigations, affording all interested parties and their representative, if any, an opportunity to submit evidence relevant to a complaint.
4. The City's ADA Coordinator will provide *for* review for the City Attorney, a written determination, as to the validity of the complaint and a description of the resolution, if any, and a copy will be forwarded to the City Manager, along with the original complaint, no later than thirty (30) days after its filing.
5. The City's ADA Coordinator will maintain files and records relating to all ADA grievances/ complaints filed.
6. The right of a person to a prompt and equitable resolution of the complaint filed hereunder will not be impaired by the person's pursuit of other remedies such as the filing of an ADA complaint with the responsible federal department or agency (i.e., U.S. Department of Justice). Use of this grievance procedure is not a prerequisite to the pursuit of other remedies.
7. These rules will be construed to protect the substantive rights of interested person, to meet appropriate due process standards, and to assure that the City of Duluth complies with the ADA and implementing regulations.

**City of Duluth
ADA Grievance Form**

Name: _____

Address: _____

Phone Number: (H) _____ (M) _____

Email Address: _____

Location of problem: _____

Date Noticed: _____

Description of the problem: _____

**Please attach additional pages if needed.*

The complaint should be submitted by the grievant and/or his/her designee as soon as possible but no later than 30 days after the alleged violation to:

City of Duluth
ATTN: Margie Pozin, City ADA Coordinator
3167 Main Street
Duluth, Georgia 30096
mpozin@duluthga.net
[\(770\)-476-1790](tel:(770)476-1790)

Appendix C – ADA Coordinator Contact Information

Duluth ADA Transition Plan Implementation Coordinator

Name: Margie Pozin Job Title: Dir. Of Community Development & Engineering

Office Address: 3167 Main Street, Duluth, Georgia 30096

Phone: (678)-957-7284

Fax: (770)-814-3008

E-mail: mpozin@duluthga.net



Appendix D – Glossary of Terms

Glossary of Terms

ABA: See Architectural Barriers Act.

ADA: See Americans with Disabilities Act.

ADA Transition Plan: Transportation system plan that identifies accessibility needs, the process to fully integrate accessibility improvements, and aims to ensure that all transportation facilities, services, programs, and activities are accessible to all individuals.

ADAAG: See Americans with Disabilities Act Accessibility Guidelines.

Accessible: A facility that provides access to people with disabilities using the design requirements of the ADA.

Accessible Pedestrian Signal (APS): A device that communicates information about the WALK phase in audible and vibrotactile formats.

Alteration: A change to a facility in the public right-of-way that affects or could affect access, circulation, or use. An alteration must not decrease or have the effect of decreasing the accessibility of a facility or an accessible connection to an adjacent building or site.

Americans with Disabilities Act (ADA): Civil rights legislation passed in 1990 and effective July 1992. The ADA sets design guidelines for accessibility to public facilities, including sidewalks and trails, by individuals with disabilities.

Americans with Disabilities Act Accessibility Guidelines (ADAAG): Contains scoping and technical requirements for accessibility to buildings and public facilities by individuals with disabilities under the Americans with Disabilities Act (ADA) of 1990.

APS: See Accessible Pedestrian Signal.

Architectural Barriers Act (ABA): Federal law that requires facilities designed, built, altered or leased with Federal funds to be accessible. The Architectural Barriers Act marks one of the first efforts to ensure access to the built environment.

Capital Improvement Program (CIP): The CIP for a public agency typically includes an annual capital budget and a five-year plan for funding the new construction and reconstruction projects on the agency's transportation system.

Detectable Warning: A surface feature of truncated domes, built in or applied to the walking surface to indicate an upcoming change from pedestrian to vehicular way.

DOJ: See United States Department of Justice.

Federal Highway Administration (FHWA): A branch of the U.S. Department of Transportation that administers the federal-aid Highway Program, providing financial assistance to states to construct and improve highways, urban and rural roads, and bridges.

FHWA: See Federal Highway Administration.

GDOT: Georgia Department of Transportation.

Pedestrian Access Route (PAR): A continuous and unobstructed walkway within a pedestrian circulation path that provides accessibility.

Pedestrian Circulation Route (PCR): A prepared exterior or interior way of passage provided for pedestrian travel.

PROWAG: An acronym for the *Guidelines for Accessible Public Rights-of-Way* issued in 2005 by the U.S. Access Board. This guidance addresses roadway design practices, slope and terrain related to pedestrian access to walkways and streets, including crosswalks, curb ramps, street furnishings, pedestrian signals, parking and other components of public rights-of-way.

Right-of-Way: A general term denoting land, property, or interest therein, usually in a strip, acquired for the network of streets, sidewalks and trails creating public pedestrian access within a public entity's jurisdictional limits.

Section 504: The section of the Rehabilitation Act that prohibits discrimination by any program or activity conducted by the federal government.

Uniform Federal Accessibility Standards (UFAS): Accessibility standards that all federal agencies are required to meet; includes scoping and technical specifications.

United States Access Board: An independent federal agency that develops and maintains design criteria for buildings and other improvements, transit vehicles, telecommunications equipment, and electronic and information technology. It also enforces accessibility standards that cover federally-funded facilities.

United States Department of Justice: Federal executive department responsible for enforcement of the law and administration of justice (also referred to as the Justice Department or DOJ).

Appendix E – Self-Evaluation

Self-Evaluation

A public entity that employs 50 or more persons is required, for at least three years following the completion of the self-evaluation, to maintain on file and make available for public inspection:

- A description of areas examined and any problems identified;
- Cost to remove the ADA barrier; and,
- A description of any modifications made and the date the modification was made.

Descriptions of areas examined, problems identified and any modifications made are listed in the following sections E-1 and E-2.

E-1. Public Facilities and Parks

The City has conducted a detailed accessibility evaluation of each of its buildings, based on the [ADA Checklist for Existing Facilities](#) publication. The results are listed below:

CITY OWNED FACILITY	ADDRESS	BARRIERS	COMMENTS	DATE OF BARRIER REMOVAL	ESTIMATED COST
Facility 1- City Hall	3167 Main Street, Duluth, GA 30096	<ul style="list-style-type: none"> Not all objects protruding into the circulation paths can be detected by a person with a visual disability using a cane. Not all ramps longer than 6' have a railing. There is not a 5' long level landing at every 30' horizontal length of ramp. There are not 8' wide spaces, with minimum 8' wide access aisles, and 98 inches of vertical clearance, available for lift-equipped vans. Second floor restroom designated as staff shall be designated as unisex handicap. Men's and Women's restrooms shall be designated as staff. These stalls are not ADA compliant 	<ul style="list-style-type: none"> Reconfigure to provide van-accessible spaces. 	TBD	\$1,000
Facility 2- Public Works Facility	2450 Main Street, Duluth, GA 30096	<ul style="list-style-type: none"> In Compliance 	-	-	-
Facility 3- Public Safety Center	3276 Buford Highway, Duluth, GA 30096	<ul style="list-style-type: none"> In Compliance 	-	-	-
Facility 4- Bunten Road Park Recreation Center	3180 Bunten Road, Duluth, GA 30096	<ul style="list-style-type: none"> There is not tactical signage identifying restrooms. 	<ul style="list-style-type: none"> Add accessible signage, placed to the side of the door, 60 inches to centerline (not on the door itself). 	TBD	\$100
Facility 5- Red Clay Theater	3116 Main Street, Duluth, GA 30096	<ul style="list-style-type: none"> Lower level restrooms does not have a wheelchair accessible stall. The lavatory rim on the upper level restroom exceeds 34 inches. 	<ul style="list-style-type: none"> Move or remove partitions. Adjust or replace lavatory. Add a larger mirror anywhere in the room. 	TBD	\$2,000
Facility 6- Duluth Community Center	3770 Pleasant Hill Road, Duluth, GA 30096	<ul style="list-style-type: none"> In Compliance 	-	-	-
Facility 7- Festival Center	3142 Hill Street, Duluth, GA 30096	<ul style="list-style-type: none"> There is not tactical signage identifying restrooms on the ground floor. The lavatory rim exceeds 34 inches. 	<ul style="list-style-type: none"> Add accessible signage, placed to the side of the door, 60 inches to centerline (not on the door itself). Adjust or replace lavatory. 	TBD	\$1,500
Park 1- Scott Hudgens Park	6325 River Green Parkway, Duluth, GA 30096	<ul style="list-style-type: none"> There are not 8' wide spaces, with minimum 8' wide access aisles, and 98 inches of vertical clearance, available for lift-equipped vans. There is not a main accessible entrance. 	<ul style="list-style-type: none"> Reconfigure to provide van-accessible spaces. 	TBD	\$1,000

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CITY OWNED FACILITY	ADDRESS	BARRIERS	COMMENTS	DATE OF BARRIER REMOVAL	ESTIMATED COST
Park 2- Roger's Bridge Park	4791 Roger's Bridge Park, Duluth, GA 30096	<ul style="list-style-type: none"> In Compliance 	-	-	-
Park 3- Tennis Courts at WP Jones Park	3620 Pleasant Hill Road Church Street, Duluth, GA 30096	<ul style="list-style-type: none"> In Compliance 	-	-	-
Park 4- Church Street Park	Church Street, Duluth, GA 30096	<ul style="list-style-type: none"> The access isle for the handicap space is insufficient. Accessible spaces are not marked. 	<ul style="list-style-type: none"> Reconfigure a reasonable number and size of spaces by repainting stripes. Reconfigure to provide van-accessible spaces. Add signs, placed so that they are not obstructed by cars. 	TBD	\$1,000
Park 5- Taylor Park	3147 Main Street, Duluth, GA 30096	<ul style="list-style-type: none"> In Compliance 	-	-	-
Park 6- Town Green	3142 Hill Street NW, Duluth, GA 30096	<ul style="list-style-type: none"> In Compliance 	-	-	-
Park 7- Willbrooke Trail	3545 McClure Woods Drive, Duluth, GA 30096	<ul style="list-style-type: none"> In Compliance 	-	-	-

E-2. Pedestrian Facilities / Public Rights-of-Way

The City has conducted a detailed accessibility evaluation of pedestrian facilities within the agency’s public rights-of-way. The results are listed below:

ADA Self-Evaluation- Pedestrian Facilities

LOCATION OF DEFICIENT PEDESTRIAN FACILITY	RAMPS OUT OF COMPLIANCE	DETECTABLE WARNING STRIPS OUT OF COMPLIANCE	LENGTH OF SIDEWALK OUT OF COMPLIANCE	LENGTH OF SIDEWALK LESS THAN 5' WIDE	DRIVEWAYS OUT OF COMPLIANCE	OTHER ITEMS OUT OF COMPLIANCE	COMMENTS	DATE OF BARRIER REMOVAL	EST. COST
Buford Highway	5	99	-	-	1	• 17 missing crosswalks	-	TBD	\$30,000.00
Hill Drive NW	-	2	-	-	-	• 3 missing crosswalks	-	TBD	\$1,200.00
May Road	-	2	-	-	-	-	-	TBD	\$600.00
Sunset Street	-	-	-	-	-	-	-	TBD	\$0.00
Regal Park Court	1	-	-	-	-	-	-	TBD	\$1,000.00
Regency Park Drive	5	-	10	-	-	• 1 uneven catch basin that needs to be adjusted to grade	-	TBD	\$5,360.00
Majestic Park Court	-	-	-	-	-	-	-	TBD	\$0.00
Jester Court	-	-	-	-	-	-	-	TBD	\$0.00
Scepter Drive	-	1	-	-	-	-	-	TBD	\$300.00
Scepter Circle	-	-	-	-	-	-	-	TBD	\$0.00
Summit Ridge Parkway	-	-	10	-	-	-	-	TBD	\$360.00
Creek Drive NW	-	-	-	-	-	-	-	TBD	\$0.00
Palisade Park Drive	-	-	-	-	-	-	-	TBD	\$0.00
Palisade Lake Drive	-	-	-	-	-	-	-	TBD	\$0.00
Palisade Cove Drive	-	-	-	-	-	-	-	TBD	\$0.00
Park Bluff Lane NW	-	-	-	-	-	-	-	TBD	\$0.00
Enfield Lane NW	1	-	-	-	-	-	-	TBD	\$1,000.00
Ennfield Way	1	-	-	-	-	-	-	TBD	\$4,660.00
Enfield Lane	4	1	10	-	1	-	-	TBD	\$9,660.00
Crossfield Way	2	-	-	-	-	-	-	TBD	\$2,000.00
Davenport Road NW	4	7	-	-	-	-	-	TBD	\$6,100.00
Heritage Walk Lane	-	-	-	-	-	-	-	TBD	\$0.00
McClure Woods Drive	8	2	-	-	-	-	-	TBD	\$8,600.00

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McClure Woods Court	-	-	-	-	-	-	-	TBD	\$0.00
Drawbridge Terrace	2	-	5	-	-	-	-	TBD	\$2,180.00
Willbrooke Run	2	-	-	-	-	-	-	TBD	\$2,000.00
Willbrooke Court	-	-	-	-	-	-	-	TBD	\$0.00
Drawbridge Court	-	-	-	-	-	-	-	TBD	\$0.00
Willbridge Court	-	-	-	-	-	-	-	TBD	\$0.00
Parkbrooke Lane	2	-	-	-	-	-	-	TBD	\$2,000.00
Parkbrooke Court	-	-	-	-	-	-	-	TBD	\$0.00
Willgrove Way	5	-	-	-	-	-	-	TBD	\$5,000.00
Willgrove Court	-	-	-	-	-	-	-	TBD	\$0.00
Duluth Park Lane NW	-	23	-	-	-	-	-	TBD	\$6,900.00
Postal Drive	-	4	35	-	-	-	-	TBD	\$2,460.00
McClure Bridge Road	-	2	-	-	-	-	-	TBD	\$600.00
Howell Springs Drive	-	-	-	-	-	-	-	TBD	\$0.00
Howell Meadow Drive NW	3	-	-	-	-	-	<ul style="list-style-type: none"> • 2 ramps with ponding • 1 ramp has silt buildup 	TBD	\$3,000.00
Howell Mead Drive	-	-	24	-	-	<ul style="list-style-type: none"> • Vertical discontinuities 	-	TBD	\$864.00
Miller Road NW	-	-	-	-	-	-	-	TBD	\$0.00
Irvindale Road NW	-	-	45	-	-	<ul style="list-style-type: none"> • Vertical discontinuities 	-	TBD	\$1,620.00
George Rogers Avenue	-	-	-	-	-	-	-	TBD	\$0.00
West Lawrenceville Street	-	2	-	-	-	-	-	TBD	\$600.00
Duluth Highway	-	7	-	-	-	-	-	TBD	\$2,100.00
Howell Street NW	-	2	-	-	-	-	-	TBD	\$600.00
Devauden Court NW	-	-	-	-	-	-	-	TBD	\$0.00
Wyesham Circle	-	-	-	-	-	-	-	TBD	\$0.00
Dogwood Creek Parkway NW	4	-	5	-	-	<ul style="list-style-type: none"> • Vertical discontinuities 	-	TBD	\$4,180.00
Harris Mill Court	-	-	-	-	-	-	-	TBD	\$0.00
Harris Mill Way	-	-	-	-	-	-	-	TBD	\$0.00
Main Street	2	9	-	-	-	-	-	TBD	\$4,700.00
Hill Street NW	-	-	-	-	-	-	-	TBD	\$0.00

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Ridgeway Road NW	-	4	-	-	-	-	-	TBD	\$1,200.00
Brock Road NW	2	10	-	-	-	• 4 missing crosswalks	-	TBD	\$5,800.00
Dailey Drive	-	-	-	-	-	-	-	TBD	\$0.00
Nesbitt Crossing Way	4	-	-	-	-	-	-	TBD	\$4,000.00
Nesbitt Crossing Circle	-	-	-	-	-	-	-	TBD	\$0.00
Jones Street NW	-	-	-	-	-	-	-	TBD	\$0.00
Donaville Street	-	-	-	-	-	-	-	TBD	\$0.00
Church Street	-	3	-	-	-	-	-	TBD	\$900.00
Dogwood Street NW	-	-	-	-	-	-	-	TBD	\$0.00
Washington Street NW	-	-	-	-	-	-	-	TBD	\$0.00
Curtis Street NW	-	-	-	-	-	-	-	TBD	\$0.00
River Green Parkway	4	1	-	-	-	-	-	TBD	\$4,300.00
Berwick Farm Drive	-	4	-	-	-	-	-	TBD	\$1,200.00
Berwick Field Drive	-	-	-	-	-	-	-	TBD	\$0.00
Berwick Field Court	-	-	-	-	-	-	-	TBD	\$0.00
Berwick South Drive	-	-	-	-	-	-	-	TBD	\$0.00
Abbotts Bridge Road	-	4	-	-	-	• 1 missing crosswalk	-	TBD	\$1,400.00
River Mill Drive	-	-	-	-	-	-	-	TBD	\$0.00
Chattahoochee Trace	4	9	-	-	-	-	-	TBD	\$6,700.00
Towne Village Drive NW	4	1	-	-	-	-	-	TBD	\$4,300.00
Olde Towne Parkway	2	-	-	-	-	-	-	TBD	\$2,000.00
Glen Vista Court		-	-	-	-	• 1 vertical discontinuity	-	TBD	\$500.00
Rogers Bridge Road		-	-	-	-	-	-	TBD	\$600.00
Castlemaine Drive NW		-	5	-	-	-	-	TBD	\$180.00
Bennigan Lane	2	-	15	-	-	• 1 vertical discontinuity and gap in sidewalk	-	TBD	\$2,540.00
Leprechan Way		-	-	-	-	-	-	TBD	\$0.00
Longlake Drive		1	-	-	-	-	-	TBD	\$300.00
Highbrooke Trail	9	-	-	-	-	-	-	TBD	\$9,000.00
Clearbrooke Way	2	-	-	-	-	-	-	TBD	\$2,000.00

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River Summit Trail	3	-	-	-	-	-	-	TBD	\$3,000.00
River Summit Drive	5	-	-	-	-	-	-	TBD	\$5,000.00
Royston Drive	6	2	-	-	-	-	-	TBD	\$6,600.00
Maristone Northwest	4	-	-	-	-	-	-	TBD	\$4,000.00
Gambrell Lane	-	3	-	-	-	-	-	TBD	\$900.00
Ashby Pond Lane	-	-	-	-	-	-	-	TBD	\$0.00
Ashby Pond Trail	-	-	-	-	-	-	-	TBD	\$0.00
Bunten Road	-	3	5	-	-	• 1 missing crosswalk	-	TBD	\$1,280.00
Parkview Run Cove NW	-	-	-	-	-	-	-	TBD	\$0.00
Barkley Square Drive	-	-	-	-	-	-	-	TBD	\$0.00
Winsley Place	3	-	5	-	-	• 1 vertical discontinuity	• 1 ramp with ponding	TBD	\$3,180.00
Canter Way	1	-	-	-	-	-	-	TBD	\$1,000.00
Main Street NW	-	-	-	-	-	-	-	TBD	\$0.00
Chattahoochee Drive NW	-	2	-	-	-	-	-	TBD	\$600.00
Tallapoosa Drive	14	-	-	-	-	-	-	TBD	\$14,000.00
Chastatee Drive	-	-	-	-	-	-	-	TBD	\$180.00
Chastatee Drive NW	-	-	-	-	-	-	-	TBD	\$0.00
Hiawasse Drive NW	-	-	-	-	-	-	-	TBD	\$0.00
Toccoa Falls Drive	-	-	-	-	-	-	-	TBD	\$0.00
Soque River Drive	-	-	-	-	-	-	-	TBD	\$0.00
Ruby Falls Drive	-	-	5	-	-	• Vertical discontinuity	-	TBD	\$180.00
Sautee Valley Drive	-	-	5	-	-	• Vertical discontinuity	-	TBD	\$180.00
Black Rock Drive	-	-	-	-	-	-	-	TBD	\$0.00
Lake Lanier Drive NW	-	-	-	-	-	-	-	TBD	\$0.00
Lake Burton Drive NW	-	-	-	-	-	-	-	TBD	\$0.00
Tugaloo River Drive NW	-	-	-	-	-	-	-	TBD	\$0.00
Unicoli Court NW	-	-	-	-	-	-	-	TBD	\$0.00
Moccasin Creek Court NW	-	-	-	-	-	-	-	TBD	\$0.00
Moccasin Creek Drive	-	-	-	-	-	-	-	TBD	\$0.00

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Percival Drive NW	-		-	-	-	-	-	TBD	\$0.00
Postwaite Circle NW	4	-	-	-	-	-	-	TBD	\$4,000.00
Postwaite Way NW	-	-	-	-	-	-	-	TBD	\$0.00
Hailston Drive NW	3	1	-	-	-	-	-	TBD	\$3,300.00
Hugoberston Drive	-	-	-	-	-	-	-	TBD	\$0.00
Deptford Drive	-	-	-	-	-	-	-	TBD	\$0.00
Hailston Lane NW	-	-	-	-	-	-	-	TBD	\$0.00
Fosco Drive NW	-	-	-	-	-	-	-	TBD	\$0.00
Hailston Lane	3	1	-	-	-	-	-	TBD	\$3,300.00
Polesdean Trace	-	-	-	-	-	-	-	TBD	\$0.00
Polesdean Lane NW	-	3	-	-	-	-	-	TBD	\$900.00
Kyrie Lane NW	-	-	-	-	-	-	-	TBD	\$0.00
Kyrie Way NW	-	-	-	-	-	-	-	TBD	\$0.00
Stoneham Drive NW	4	-	-	-	-	-	-	TBD	\$4,000.00
McCallister Circle		-	-	-	-	-	-	TBD	\$0.00
Baxley Ridge Drive	-	-	-	-	-	-	-	TBD	\$0.00
Bethel Trace	-	-	-	-	-	-	-	TBD	\$0.00
Baxley Pine Trace	-	-	-	-	-	-	-	TBD	\$0.00