District Department of Transportation

2025 Americans with Disabilities Act Transition Plan Update

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2 Introduction

The purpose of the 2025 American with Disabilities Act Transition Plan Update is to report the accomplishments of the District Department of Transportation (DDOT) for Fiscal Year 2024 (FY24). DDOT is committed to not discriminate against individuals with disabilities in its services, programs, or activities, and will honor and work to satisfy the requirements of Titles I through V of the Americans with Disabilities Act of 1990 (ADA).

DDOT recognizes that there are inequities in transportation policy, planning and project delivery in Washington, DC (District). Deep-rooted structural injustices and inequities have contributed to the disparate access to safe, affordable, and efficient transportation that provides access to economic opportunities, housing and services for communities across the District. DDOT continues to work diligently to upgrade the Public Right of Way (PROW) so that a person with disability may have equal access and safety in their travel opportunities within the District. DDOT's ADA Coordinator implements the District's ADA transition plan through coordination and collaboration of various internal divisions.

In the 2025 transition plan update, DDOT will highlight continued efforts to enhance the Public Right of Way (PROW), focusing on removing barriers and addressing ADA non-compliance. As we progress toward our long-term goals, we remain committed to driving transformative change that ensures greater inclusivity and accessibility across the District. This update reflects DDOTs' ongoing dedication to creating a more equitable environment where all individuals, regardless of ability, can navigate with ease and dignity.

The 2025 ADA Transition Plan Update includes the following elements:

- Official(s) responsible for implementation of the transition plan
- Public Involvement Plan
- Inventory of barriers
- Methods to make facilities accessible
- Schedule to remove barriers
- DDOT's Complaint/Grievance Process

3 Responsibility for the ADA Transition Plan

FHWA requires that states designate an official responsible for implementation of the Transition Plan, i.e., Executive Director, Secretary, Commissioner, Chief Engineer, etc*. 28 CFR 35.150(d)(3)(iv).*

At DDOT, the coordination and implementation of the ADA Transition Plan for (The Plan) is the responsibility of the Agency Director. The Director approves the plan and provides guidance and leadership to ensure compliance and commitment to The Plan. The Director designates an ADA Coordinator who will be responsible for the day-to-day implementation of this Plan as it relates to Title II of the ADA.

Sharon Kershbaum
Director
District Department of Transportation
250 M Street SE
Washington, DC 20003

Designation of Title II ADA Coordinator
The following individual has been designated as the coordinator for ADA implementation of this Plan within DDOT:

Xavier Davis
Americans with Disabilities Act Coordinator
Equity and Inclusion Division
District Department of Transportation
250 M Street SE
Washington, DC 20003

4 Public Involvement

FWHA requires a description of a process to allow the public to readily access and submit comments for both self-evaluation and transition plan. *28 CFR 35.150(d)(1); 28 CFR 35.105(b)*

2025 ADA Transition Plan Public Involvement

DDOT hosted a public forum on January 30, 2025, to inform the general public of the proposed information that would be submitted in the FY25 transition plan update. DDOT presented the ADA transition plan to the Multimodal Accessibility Advisory Council (MAAC) at the February 14, 2025, meeting. The MAAC is a Council of persons with disabilities appointed by the Mayor who advises DDOT and other relevant District agencies on transportation issues that affect the disability community.

Finally, during FY24, DDOT hosted an estimated 333 public information sessions, to keep the public abreast to the proposed projects in the District.

District-Agencies and Community Partnerships

DDOT's Equity and Inclusion Division collaborated with organizations to share information and provide updates on the removal of physical barriers. Below is a list of the organizations that collaborate with DDOT:

- Age Friendly DC – The Age-Friendly DC initiative is the District's commitment to embrace policies to enable adults to age in place. Age-Friendly DC is comprised of three pillars – built environment, changing attitudes about growing older, and lifelong health and security. Each pillar is then comprised of several policy domains including transportation. In FY24, DDOT met with Age-Friendly DC task force members to review progress made for the 2018-2023 Age Friendly DC plan. The transportation domain

achieved all goals outlined in 2018. In addition, the task force met to develop a transportation-related goal for the 2024 – 2028 Age-Friendly DC plan. The goal for the current plan is to ensure traveling options are safe and easily available. The task force aims to monitor this goal by tracking reports of crashes among older adults and persons with disabilities as well as tracking sidewalk repairs and installation of DDOT safety treatments such as audible pedestrian signals each calendar year.

In FY25, DDOT, in partnership with other District agencies and residents, will develop new goals to measure and track the District's performance toward implementing an age-friendly transportation network during FY24 – FY29.

- DC Office of Disabilities Rights (ODR) – In FY24, DDOT worked collaboratively with ODR to address resident concerns with accessibility issues in the public right of way (PROW). DDOT and ODR have worked together in a collaborative and impactful partnership to thoroughly investigate, address, and recommend next steps for every concern raised by the public. This strong collaboration has paved the way for meaningful solutions, and we are excited about the continued partnership and the great work that lies ahead.

- Multimodal Accessibility Advisory Council (MAAC) – The MAAC serves as an advisory body to the District on making public space more accessible to persons with disabilities. In FY24, the MAAC adopted Principles for Arterial Street Space Usage, which established a hierarchy for street space allocation, prioritizing accessible sidewalks and transit lanes over private vehicle storage. In addition, the Chair of the MAAC joined DDOT's training on Designing Pedestrian Facilities for Accessibility with the Federal Highway Administration to present his perspectives on accessibility and ADA compliance in the District.

District Communications Policies and Guidance

- District of Columbia Accessibility Policy on Effective Electronic Communications: Effective Communication | odr (dc.gov)
- Section 508 of the Rehabilitation Act of 1973 as amended by 1998 the Work Force Investment Act (section 1194.22 and its subsequent amendments) as minimum requirements for web accessibility: Rehabilitation Act (access-board.gov)
- DDOT Public Involvement Plan: Public Involvement Plan | ddot (dc.gov)
- District of Columbia Language Access Statement: Language Access | DCHR

5 Inventory of Barriers

FHWA requires States to demonstrate good faith by identifying intersection information, including curb ramps and other associated accessibility elements, as a starting point and showing movement and commitment toward developing a full inventory.

FHWA requires an Action Plan to develop an inventory of sidewalks (slopes, obstructions, protruding objects, changes in levels, etc.), signals (APS), bus stops (bus pads), buildings, parking, rest areas (tourist areas, picnic areas, visitor centers, etc.), mixed use trails, linkages to transit. *28 CFR 35.150(d)(3)(i); 28 CFR 35.105 (a)*

2016 ADA Inventory of Barriers

In 2016, the Equity and Inclusion Division within DDOT developed an Inventory of Barriers map, which includes information on the following assets:

- Sidewalks (Barriers in the Public Right of Way)
- Curb Ramps
- Bus Stops
- Audible Pedestrian Signals

An evaluation of these assets throughout the District's PROW was completed in 2016 to determine compliance with ADA Standards. The assets collected were visually assessed and were given a designation or condition assessment of:

- Good – asset meets compliance from a visual perspective
- Fair – asset may be good, however measurements are required to confirm compliance
- Missing – asset is missing and required on the location
- Non-compliant – asset is visually non-compliant and/or is a physical barrier

The inventory of barriers denotes to what degree the asset is compliant or non-compliant with the ADA, location, and an estimated date of improvement (if applicable).

Action Plan to Update the ADA Inventory of Barriers

The Equity and Inclusion Division conducted its last exhaustive inventory of barriers in 2016; to better serve our community and ensure reliable information, the Equity and Inclusion Division is working to procure funding for software solutions that will interface with current systems and software that various DDOT divisions use in their operations to produce an updated map of barriers. We understand the need for current data and are dedicated to bridging this gap with innovative tools.

Geographic Information System (GIS) Mapping "ADA Layer"

DDOT is developing a GIS mapping layer designed to identify barriers within the public right-of-way that have been addressed since the 2016 scan of assets for the Inventory of Barriers. This map will play a pivotal role in enhancing accessibility, promoting inclusivity, and driving ADA compliance throughout the District.

The following sites will be included on the map and serve as examples of DDOT's commitment to not only identifying barriers but also ensuring that essential assets are brought into full ADA compliance, ultimately fostering a more accessible transportation network:

Location	Prior Conditions	Progress toward ADA Compliance
1. Talbert Street SE (Shannon Pl SE – MLK Jr Ave SE)	July 2015	October 2024
1. Florida Ave NE (2nd – 13th St NE)	February 2016	November 2024
2. I St SW (Delaware St SW – Half St SW)	September 2015	November 2024
3. 11th Street NW (T St NW – U St NW)	June 2015	December 2024
4. Southern Ave SE (Suitland Rd. SE – Pennsylvania Ave SE)	November 2015	December 2024

Collaboration with other DDOT Divisions to identify, evaluate, and track barrier removal

As a continuation of the efforts to remove physical barriers in the PROW, Table 1 shows the number of assets and sidewalk miles improved from FY19 thru FY24. In FY24, DDOT removed and estimated 1,800 physical barriers such as trip hazards spanning over 52.0. miles of sidewalk.

Asset	Physical Barriers Removed (FY 2019 – FY 2024)					
	FY19	FY20	FY21	FY22	FY23	FY24
APS Devices	112	106	169	182	160	504
Bus Stops	29	44	28	95	78	58
Curb Ramps	1,400	1,941	1,054	1,039	1,000	1,235
Sidewalk (miles)	54.05	55.53	30.88	44.38	69.0	52.0

Table 1. FY19 - FY24 Physical Barriers Removed

Sidewalk Restoration Dashboard

The District maintains approximately 1,495 miles of sidewalks. The overall condition of the District's sidewalks is continuously improving as sidewalk repairs and replacements are performed regularly. In FY23, DDOT developed a sidewalk restoration dashboard to make data on sidewalk improvements to remove protruding objects, barriers and/or improve sidewalk slopes available to the public. Data includes completed improvements since CY 2018 and repairs that are planned or under construction until CY 2027. In FY24, DDOT spent an estimated $22.5 million dollars to improve sidewalk conditions.

The dashboard also includes the type of repairs made (Table 2):

Table 2: Types of Sidewalk Repairs

Horizontal Cutting	This maintenance treatment entails the use of a saw to cut away trip hazards on concrete sidewalk. The treatment is typically used on elevation changes between concrete slabs up to 1.5". This method is cost effective by preventing full replacement of existing material and taking only minutes to perform.
Sod/Reseeding Tree Lawn	DDOT will often plant sod or even reseed the tree lawn area in ROW as part of secondary work with sidewalk restoration. Typically, a rye grass or bluegrass will be planted or seeded if necessary, following the completion of sidewalk restoration. This occurs during the spring and fall months coinciding with cooler temperatures which are ideal for rooting. During summer months (June thru August) resodding or reseeding will not occur.
Temporary Sidewalk Repairs	DDOT will attempt to perform temporary repairs for isolated sidewalk locations which pose a tripping hazard. The maintenance treatment entails using asphalt, removing the distressed area and replacing it with an asphalt patch. The temporary repair is designed to quickly mitigate locations and ensure that the pedestrian access route is functional and compliant for users.

6 Methods to Remove Barriers

FHWA requires States to describe in detail the methods that will be used to make the facilities accessible. *28 CFR 35.150(d)(3)(ii)*

Applicable Standards, Regulations and Codes

The Department is fully committed to upgrading the PROW so that people with disabilities have equality in access and safety in their travel opportunities in the District. Whenever the Department substantially paves, repaves, resurfaces, or engages in the construction of a roadway, bridge, or tunnel, it will bring that portion into compliance with the ADA.

The Department adheres to the following guidance:

- PROWAG, drafted in 2011 by the U.S. Access Board
- DDOT Design and Engineering Manual
- Manual on Uniform Traffic Control Devices
- Standards Specifications for Highway Structures

Documenting "Corrected" Barriers

After a barrier has been removed, DDOT documents how the asset was brought into compliance in the agency's internal database management system ProTrack+. Documentation includes pictures of the completed asset, measurements and a signature from DDOT official signifying compliance with the Americans with Disabilities Act and any applicable local and federal regulations, laws, and policies (Example).

Challenges

Funding is DDOT's primary challenge in bringing assets into full compliance with the ADA. Most of the upgrades made to the transportation system will occur as alterations to existing right-of-way, and much of this work is contingent on funding and prioritization within DDOT's work plan. DDOT must comply with laws regarding right-of-way, historic preservation and environmental considerations, as well as physical constraints.

DDOT intends to comply with ADA guidelines "to the maximum extent feasible" but, at times it may be technically infeasible to accomplish a fully compliant solution. Every effort will be made to remove all barriers and provide easy access to transportation facilities over which the agency has control. In addition, attempts will be made to work with other public right of way owners and adjacent property owners to determine the best solution for each area. DDOT will follow its established guidelines on technical infeasibility and undue financial burden.

7 Barriers Removed in FY24

DDOT has continued efforts of removing physical barriers as part of routine maintenance work in the PROW. DDOT's Sidewalk Plan is to ensure paths of travel are accessible to all and in compliance with the PROW domain. In FY24, DDOT made improvements across 52 miles of sidewalk and removed an estimated 1,800 barriers in the PROW.

Sidewalk Restoration Citywide Project

During FY24, DDOT worked along multiple corridors and intersections and brought multiple assets into compliance. The project provided 52.0 miles of barrier removal from the sidewalk. See PaveDC for a full list of locations completed.

Ward	Sidewalk Miles Improved
1	4.0
2	6.0
3	7.0
4	8.0
5	10.0
6	8.0
7	5.0
8	4.0

Table 3. Number of locations and sidewalk miles improved for ADA compliance based on Wards

Traffic Engineering and Safety Division

During FY24, the Traffic Engineering and Safety Division worked along multiple intersections, providing safety and accessibility compliance. The Traffic Engineering and Safety Project provided full optimization and installed Accessible Pedestrian Signals (APS) to the intersections throughout the District. Also, the project implemented Leading Pedestrians Intervals (LPI) where needed, improved crosswalk markings and repaired curb ramps. The project selected locations for traffic signal modifications based on requests made through DDOT's 311 request line, and analysis of pedestrians/vehicular interaction data. The Traffic Engineering and Safety Project installed 160 APS devices and repaired 144 curb ramps. See Appendix A for a full list of locations completed.

311 Service Requests

311 is the non-emergency line for access to District services. The public can use 311 to report issues in the PROW by calling 311, completing an online form, or through a mobile application. When using the online form or mobile application, each complaint is organized by issue such as traffic signals, sidewalk, potholes, and APS device repair.

Sidewalk complaints reported through 311 are visited by DDOT's public space inspector and addressed by a street maintenance crew. If deemed an issue, this team can apply an asphalt patch to provide a short-term fix for tripping concerns.

Traffic signal complaints reported through 311 are routed to the Traffic Management Center and are assigned to a signal crew to be addressed. The signal topic area of 311 has an option for users to indicate an issue with a push button.

DDOT's ADA Title II Coordinator is not notified for any issue reported in 311. However, individuals may request assistance from the ADA Title II Coordinator and/or file a grievance if there are significant disability and accessibility-related concerns. The ADA Title II Coordinator can then navigate the system, engage responsible parties overseeing the program, service or policy, and identify a resolution.

When DDOT receives service requests from the public regarding accessibility, the agency will do its utmost to make improvements. These requests will be reviewed and addressed to the maximum extend allowable given ADA requirements, safety standards, infrastructure restrictions, and policies.

8 Schedule to Remove Barriers in FY25 and Beyond

FHWA requires States to show a strong commitment toward upgrading ADA elements identified in the inventory of barriers in the short term (planned capital improvement projects) and a strong commitment over time toward prioritizing curb ramps at walkways serving entities covered by the ADA. *28 CFR 35.150(d)(2)* This would also include planning and investments directed at eliminating other identified barriers over time. *28 CFR 35.150(d)(3)*

DDOT is committed to implementing effective processes for the removal of physical barriers to meet compliance with the ADA within the PROW. The ADA coordinator will continue to partner with the various DDOT Administrations, District Agencies, and communities to ensure implementation of the ADA Transition Plan, and prioritization of addressing non-compliant assets in the PROW domain.

PaveDC includes locations for proposed sidewalk (pedestrian access route) improvements from FY24 – FY27 including the type of improvement needed. The projected locations are expected to address 47.23 miles of sidewalk, which include updates to bus stops and curb ramps. However, the proposed locations for FY25 and beyond are subject to change pending budget reallocations and inclement weather delays.

Prioritizing Barrier Removal beyond FY24

Sidewalks, Curb Ramps and Bus Stops

In FY23, DDOT launched the Sidewalk Gap Program. The Sidewalk Gap Program is a multiyear program to construct new sidewalks wherever sidewalk does not already exist and where pedestrians are legally permitted (i.e., streets, not highways) by 2030. During the launch, DDOT identified over 2,500 sidewalk gap segments that span approximately 233 miles of the 1,600 miles of sidewalk in the District.

In FY24, approximately one mile of sidewalk gaps was filled across the District. This is on par with DDOT's historical average but unfortunately, this is short of the revamped Sidewalk Gap Program's goal of eight miles annually. Construction was delayed due to contracting issues including prolonged negotiations. Contracts were not in place until late summer 2024. All the remaining FY24 workplan locations were transferred to the FY25 workplan.

In FY26, the Sidewalk Gap Program will apply an improved prioritization methodology that will 1.) give priority to streets that have sidewalk missing on both sides; 2.) integrate sidewalk network connectivity analysis to consider important community destinations; and 3.) integrate demographics (e.g., populations 65+, under 5, with disabilities, and without vehicles) to ensure we prioritize communities with the greatest need for a fully connected sidewalk network. The Program's short-term goal is to build a sidewalk on at least one side of every street which will take approximately six years.

APS Devices

It is DDOT's policy to install APS devices as part of (1) Individual Intersection Projects: new traffic signal construction/rebuilds and (2) Corridor Projects: those associated with major roadway and streetscape projects. DDOT typically constructs or rebuilds 5-15 intersection projects per year throughout the District where the signals are outfitted with APS devices. By comparison, the streetscape and major roadway projects provide an opportunity to install 10-15 signals to full ADA/APS compliance at one time and provide design consistency throughout a corridor.

Besides the above vehicles, APS requests at specific/standalone locations from the community or a citizen are also evaluated by DDOT. The first step is typically a field meeting to review the needs of the person requesting the APS. DDOT will then evaluate the existing pole locations and other signal infrastructure to determine the feasibility of retrofitting APS such that those needs are met. The following are possible outcomes of this stand-alone process:

- If a retrofit is possible, DDOT will design and install APS on existing signal poles. Where necessary and feasible, DDOT may also add poles or other signal equipment to provide complete APS infrastructure.
- If a retrofit is not possible, a full signal rebuild is usually required through a new project. DDOT would determine how and when to proceed with the signal rebuild while balancing other project priorities and budgetary constraints.

9 Grievance Process for Title II of the ADA

Title II of the Americans with Disabilities Act of 1990 (ADA) protects qualified individuals with a disability from discrimination on the basis of that disability in the services, programs, or activities of the DDOT.

DDOT does not discriminate against qualified individuals with a disability in its services, programs or activities. Also, qualified individuals with a disability are not excluded from participation in or denied the benefits of the services, programs, or activities of the DDOT. Individuals are encouraged to file complaint under Title II of the ADA about the services, programs or activities of the DDOT if they have a grievance.

How to file a Grievance

Written Complaint
A written complaint should be filed on the ADA Grievance Form attached hereto. The written complaint should contain information about the alleged discrimination such as name, address, phone number of complainant and location, date, and description of the problem.

Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint, will be made available for persons with disabilities upon request. The complaint should be submitted by the grievant and/or designee as soon as possible but no later than 30 calendar days after the alleged violation to ddot.ada@dc.gov and addressed to:

Xavier Davis, ADA / Section 504 Coordinator
250 M Street SE
Washington, DC 20003
Phone: 202-671-2002
E-mail: ddot.ada@dc.gov

Within 10 working days of the submitted complaint, the ADA / Section 504 Coordinator or designee will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of DDOT and offer options for substantive resolution of the complaint.

Within 30 working days of receipt, the ADA / Section 504 Coordinator or designee will conduct the necessary investigation to validate the compliant and description of resolution. If appropriate, the ADA /Section 504 Coordinator or designee will coordinate a meeting with the grievant to discuss the compliant and to reach an informal determination. Any determination will be documented in the ADA Complaint Form.

District Department of Transportation

External ADA/Section 504 Complaint Form

The District Department of Transportation (DDOT) has a firm commitment to not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities, and will honor and work to satisfy the requirements of Title I, Title II, and Title IV of the Americans with Disabilities Act of 1990 (ADA) and Section 504 of the Rehabilitation Act of 1973 requirements covered under 49 CFR Part 27, Nondiscrimination on the Basis of Disability in Programs and Activities Receiving or Benefiting from Financial Assistance.

Anyone who requires auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a DDOT's program, service, or activity, or is presented with an access barrier within the Public Rights-Of-Way (PROW) should contact either the immediate responsible DDOT manager or Xavier Davis, ADA Coordinator, Transportation Equity

and Inclusion Office, District Department of Transportation. Mr. Davis can be reached at (202) 671-2002, by email at ddot.ada@dc.gov, or in writing at 250 M Street, SE, Washington, DC 20003.

Online
Individuals may also file a grievance on DDOT's website:
DDOT GRIEVANCE FORM | ddot (dc.gov)

10 Appendix

Appendix A – FY24 List of Completed Locations Traffic Engineering and Safety Project

Location
25th St, & M St, N.W
26th St, & M St, N.W
Benning & C, SE
Connecticut Avenue and Tiden Street, NW
Stanton Road & Bruce Place S.E
Eastern Avenue and Sligo Mill Road, SE
3000 Blk M St, NW
Georgia Ave and Hamilton Street, NW
M St & Thomas Jefferson St, NW
16th Street & Church Street, NW
Southern Avenue & Fitch Street, SE
14th Street, KY Avenue, and D Street, SE
Georgia Avenue and Farragut Street, NW
Nebraska Ave and Warren St, NW
14th St and Farragut St, NW
Georgia Ave and Jefferson Street, NW
Georgia Ave, Iowa Ave and Varnum St, NW
South Capitol St & I St
New Mexico Ave and Macomb St, NW
Western Avenue & Livingston St NW
Florida Ave & Quincy Pl NW
4th St & K St NW
Half St & I (Eye) St SE
Fort Dupont Terr & Mass Ave SE
18th St & E Capitol St SE

Georgia Ave & Quincy St, NW
16th St and Blagden Ave, NW
Virgina Ave and E Street, NW
Rock Creek Church Road & Harewood Road, NW
13th Street and Upper E Street, NW
13th Street and F Street, NW
3rd St and Rhode Island Ave, NE
Arizona Avenue & MacArthur Blvd, NW
4th Street and Morse Street, NE
5th Street and Pennsylvania Ave, NW
15th Street and Pennsylvania Ave, NW
37th Street, Wisconsin Ave, and Calvert Street, NW
13th Street and F Street, NW
Rhode Island Ave and Thayer Street, NE
6th Street and I Street, SW
Reno Road And Rodman Street, NW
1st St and D St, SE
10th St and Talyor St, NE

Appendix B – FY25 List of Proposed Locations Traffic Engineering and Safety Project

Location
14th St, Webster St, and South Dakota Ave, NE
14th St and NY Ave, NW
15th St and Euclid St NW
5th St, Florida Ave and NJ Ave, NW
1st St and C St, SE
16th St, Benning Rd and Hechinger Drwy, NE
11th St SE & G St SE
N. Cap St & Riggs Rd
14th St and S. Dakota Ave, NW
Foxhall Rd NW and Q St NW
30th St, Naylor Rd & Gainesville St, SE
6th St and G St NW
Minnesota Ave and Clay Pl, NE
16th St and Belmont St NW

13th St, Pennsylvania Ave and Upper E St, NW
MLK Ave and Redwood St, SE