

Town of **Richlands, NC**

Americans with Disabilities Act (ADA) Transition Plan

December 14, 2021

**PRECISION
INFRASTRUCTURE
MANAGEMENT**

Leader in Right of Way Asset Management



**RICHLANDS TOWN HALL
302 S. Wilmington Street
Richlands, NC 28574
910-324-3301**

INTRODUCTION

The purpose of an ADA Transition Plan is to ensure the residents and visitors of Richlands have full access to the Town's public right-of-way and public facilities. It is designed to accommodate disabled persons of Richlands to achieve fair access to facilities without limiting their quality of life. The Town of Richlands is committed to meet all the accessibility needs of disabled individuals. This ADA Transition Plan includes those plan components specifically requested by the Town of Richlands to fulfill requirements of the ADA.

TRANSITION PLAN 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

As required by Title II of ADA ([28 CFR Part 35 Sec. 35.105 and Sec. 35.150](#)), Richlands has conducted a self-evaluation of its 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.

AGENCY REQUIREMENTS

Under Title II, Richlands 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\(a\)](#)].

- 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

In accordance with [28 CFR 35.107\(a\)](#), Richlands has designated the following person to serve as ADA Title II Coordinator, to oversee Richlands' policies and procedures:

Name: Jonathan Jarman
 Title: Public Works Director
 Contact Information is provided in Appendix E

In accordance with [28 CFR 35.150\(d\)\(3\)](#), Richlands has designated the following person to serve as ADA Transition Plan Implementation Coordinator, to monitor Richlands' progress and manage review and updates of this document:

Name: Gregg Whitehead
 Job Title: Town Manager
 Contact information is provided in Appendix E.

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 locations, absence of curb ramps or detectable warnings, demolition and replacement, and facility evaluations. 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 & Findings

In October of 2021, Richlands completed a self-evaluation of its facilities within public rights-of-way regarding accessibility. The following right-of-way deficiencies were requested by the Town: specific sidewalk areas of approximately 10 miles, vertical height displacement locations, absence of curb ramps, absence of detectable warnings, curb ramp widths, and areas that may require demolition and replacement. These deficiencies were cataloged in a geodatabase and provided to the Town. The methodology used to conduct the condition study followed the ADA Guidelines for ADA Transition

Planning, Public Right of Way Accessibility Guidelines, and Self- Assessment Checklists for Public ROW. The references to these are provided below:

- ADA Transition Plan Guidelines Title II Checklist: [Checklist](#)
- Public Right-of-Way Accessibility Guidelines: [PROWAG](#)
- ADA Accessibility Guidelines: [ADAAG](#)
- ADA Guide for Small Towns: ADA Guide

Detailed inventories and findings from this review are provided in Appendix A.

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 provide a summary of improvements and obstacles that Richlands plans to address as part of this Transition Plan.

PUBLIC OUTREACH

Richlands 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 Richlands.

Public outreach for preparation of this document has consisted of the following activities which can be found in Appendix B:

- ADA Transition Plan Review Checklist
- Announcement of the ADA assessment at a Council Meeting
- Adoption of a Grievance Procedure
- A public survey disseminated through the Town's website and available at Town Hall

This document was also made available for public comment. Appendix C provides a summary of comments received and detailed information regarding the public outreach activities.

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. A draft of this public notice is provided in Appendix D. If users of Richlands's facilities and services believe the Town has not provided a reasonable accommodation, they have the right to file a grievance. In accordance with [28 CFR Sec. 35.107\(b\)](#), the Town 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 D.

ACTION PLAN TIMELINE

Category	2022	2023	2024	2025	2026	Total
Install Detectable Warning Surfaces	7	7	7	7	7	35
Install New Curb Ramps	6	6	6	6	6	30
Repair Sidewalk Hazards	39	70	70	64	64	307
Replace Sidewalk Panels	10	9	9	8	7	43

PLAN IMPLEMENTATION OF CORRECTIVE ACTIONS

- Prioritize identified issues.
- Inform and educate town 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 Town of Richlands' website and a printed copy is available for review by request at Town Hall.

302 S. Wilmington St.
Richlands, NC 28574

FORMAL ADOPTION OF ADA TRANSITION PLAN

This ADA Transition Plan is hereby adopted by the Town of Richlands, effective December of 2021.

Signed:

ADA Title II Coordinator

Date

ADA Transition Plan Implementation Coord.

Date

Authorizing Official

Date

APPENDIX A

Sidewalk Right of Way Self-Assessment and Implementation Plan



Town of Richlands, NC

Sidewalk Self-Assessment and Condition Study

Prepared By:



PIM | PRECISION
INFRASTRUCTURE
MANAGEMENT

October 27, 2021

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INFRASTRUCTURE
MANAGEMENT

2021 PIM CS LLC – Proprietary and Confidential

TABLE OF CONTENTS

INTRODUCTION.....10

SELF-ASSESSMENT.....10

ASSESSMENT FINDINGS SUMMARY11

FINDINGS BY DEFICIENCY CATEGORY12

 1.0 SIDEWALKS12

 2.0 DEMOLITION AND REPLACEMENT.....14

 3.0 CURB RAMPS.....15

 4.0 ABSENCE OF DETECTABLE WARNING SURFACES.....16

APPENDIX A – SCOPE OF SELF-ASSESSMENT 17

APPENDIX B – SIDEWALK ASSET MANAGEMENT PLAN19

INTRODUCTION

The Town of Richlands, NC contracted with Precision Infrastructure Management (PIM CS LLC) in August 2021 to complete an ADA Transition Plan including a Self-Assessment and Condition Study on 10.0 linear miles of Town-owned sidewalk assets. The purpose of an ADA Transition Plan is to ensure the residents and visitors of Richlands have full access to the Town's public right-of-way and public facilities. It is designed to accommodate disabled persons of Richlands to achieve fair access to facilities without limiting their quality of life. The Town of Richlands is committed to meet all the accessibility needs of disabled individuals as required by Title II of ADA ([28 CFR Part 35 Sec. 35.105 and Sec. 35.150](#)). This Self-Assessment and Condition Study is an integral part of the overall ADA transition planning process identifying current-state conditions and identifying maintenance actions and resources required for the Town to bring its sidewalk assets into ADA compliance. PIM CS LLC completed the Self-Assessment and Condition Study in August, 2021. This report is a comprehensive review of the condition study and includes a sidewalk asset management plan (SAMP) to support the Town's budgeting and work planning processes as part of their ADA Transition Plan.

The Study found a total of **415** deficiencies (based on selected criteria) across the 10 miles of sidewalk assets. The deficiencies are categorized and prioritized within the report by type, location, and severity to assist in the development of the Sidewalk Asset Management Plan. The SAMP provides Richlands with a 5-year plan with proposed timelines and estimated budgets to support ADA compliance efforts.

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, 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 locations, absence of curb ramps or detectable warnings, demolition and replacement, and facility assessments. 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-assessment process by submitting comments [[28 CFR Sec. 35.105\(b\)](#)] (not part of PIM scoping).

Process & Findings

In November, 2020 Richlands identified the need to perform a Self-Assessment of its sidewalks within public rights-of-way regarding accessibility. PIM was contracted to complete the Self-Assessment in July 2021. The Town identified 6 deficiency conditions to be included in the self-assessment and condition study. (See Exhibit 1 for detailed list). These deficiencies were cataloged in a geodatabase and provided to the Town. The methodology used to conduct the condition study followed the ADA Guidelines for ADA Transition Planning, Public Right of Way Accessibility Guidelines, and Self-Assessment Checklists for Public ROW. The references to these are provided below:

- ADA Transition Plan Guidelines Title II Checklist: [Checklist](#)
- Public Right-of-Way Accessibility Guidelines: [PROWAG](#)
- ADA Accessibility Guidelines: [ADAAG](#)
- ADA Guide for Small Towns: ADA Guide

An ADA Self-Assessment is not an engineering study and therefore items such as curb ramps, detectable warnings, and other architectural modifications included for replacement in the Town's implementation plan should be reviewed by the appropriate personnel.

ASSESSMENT FINDINGS SUMMARY

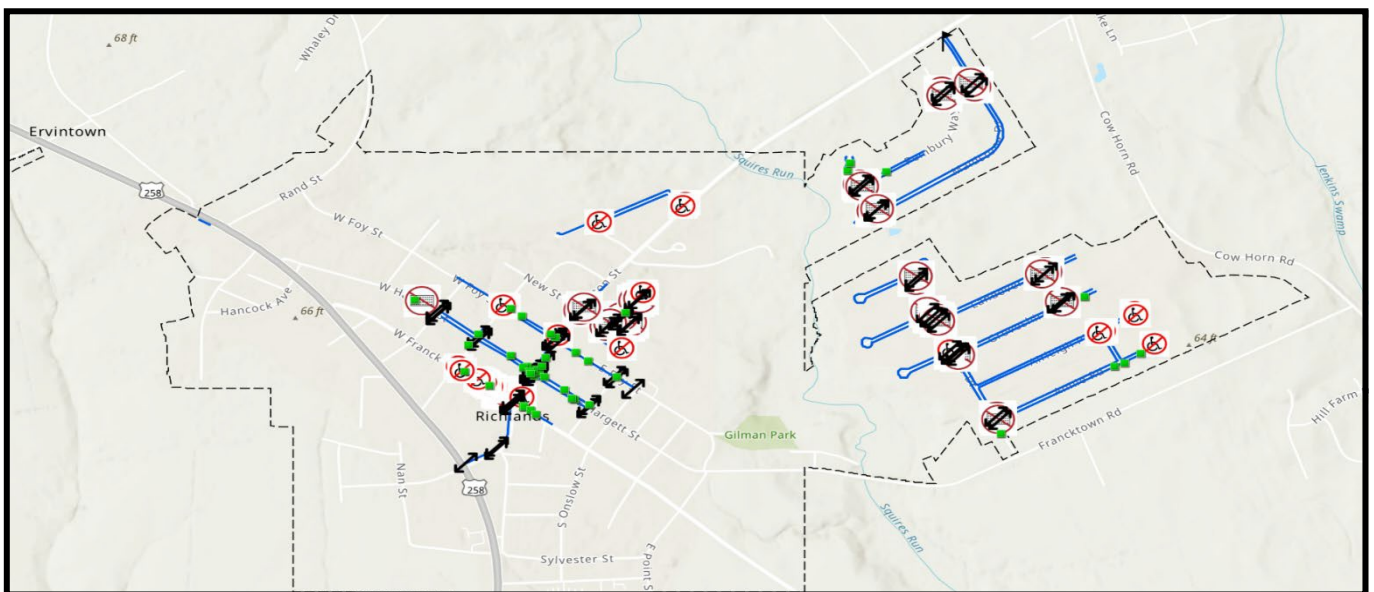
The field assessment of 10 miles of Town of Richlands sidewalk assets identified 1,354 elements within the 10 deficiency categories within the scope of the project. These elements are reviewed in detail in the following sections.

**Total Elements
Identified**

479

**Miles of Sidewalk
10**

▪ Sidewalk Trip Hazards	307
▪ Demolish and Replace Panels	43
▪ No Curb Ramp	30
▪ Curb Ramp Width Assessment	64
▪ No Detectable Warnings	35



FINDINGS BY DEFICIENCY CATEGORY

1.0 SIDEWALKS

1.1 Assessment Specifications

Sidewalk Vertical Height Displacement (VHD) Severity class:

- Small ($\frac{1}{4}$ " up to $\frac{1}{2}$ ")
- Medium ($\frac{1}{2}$ " up to 1.0")
- Large (1.0" up to 2.5")

1.2 VHD Assessment Results

1.2.1 Vertical Height Displacement (VHD) Totals

Small	188
Medium	103
Large	16

1.2.2 Priority VHD Repairs

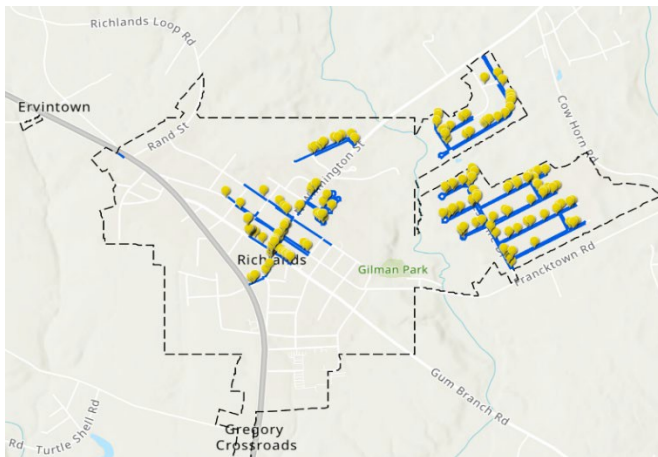
All Medium and Large VHD locations (119 locations) are priority repairs.

1.2.3 VHD Estimated Repair Cost

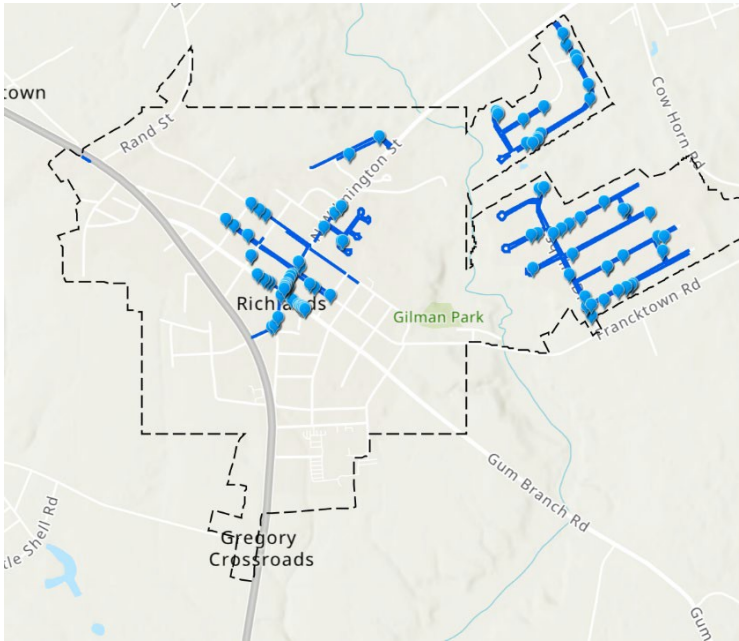
Repair costs for vertical height displacement will vary based on the square footage and severity class involved. A prioritized summary of repair costs is provided in Appendix B - Sidewalk Asset Management Plan.

3.2.4 VHD Locations and Examples

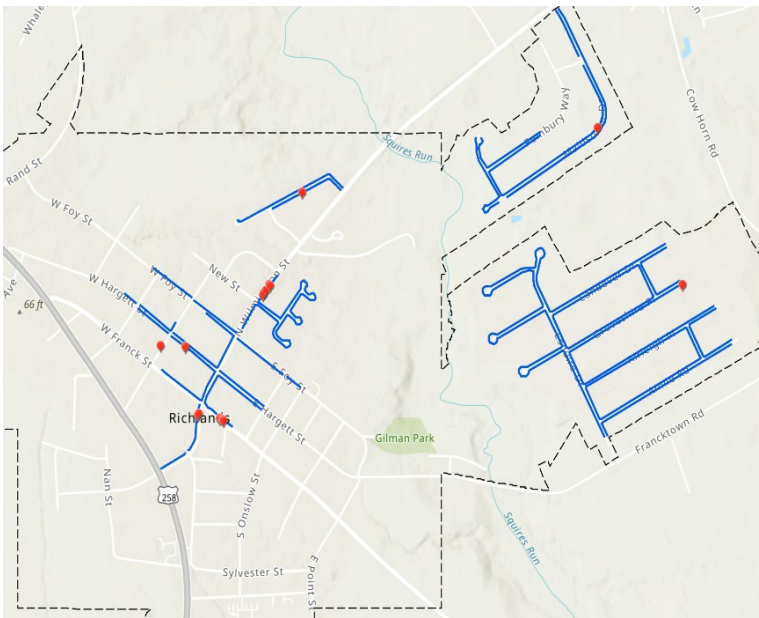
SMALL ($\frac{1}{4}$ in. up to $\frac{1}{2}$ in.)



MEDIUM (½ in. up to 1.0 in.)



LARGE (1.0 in. up to 2.5 in.)



2.0 Demolition and Replacement

2.1 Demolition and Replacement Assessment Specifications

Sidewalk panels were assessed based on the following compliance criteria of 4 or more cracks per panel and/or panel unstable – priority replacement

2.2 Demolition and Replacement Assessment Results

There were 43 sidewalk panels that met the criteria for priority replacement.

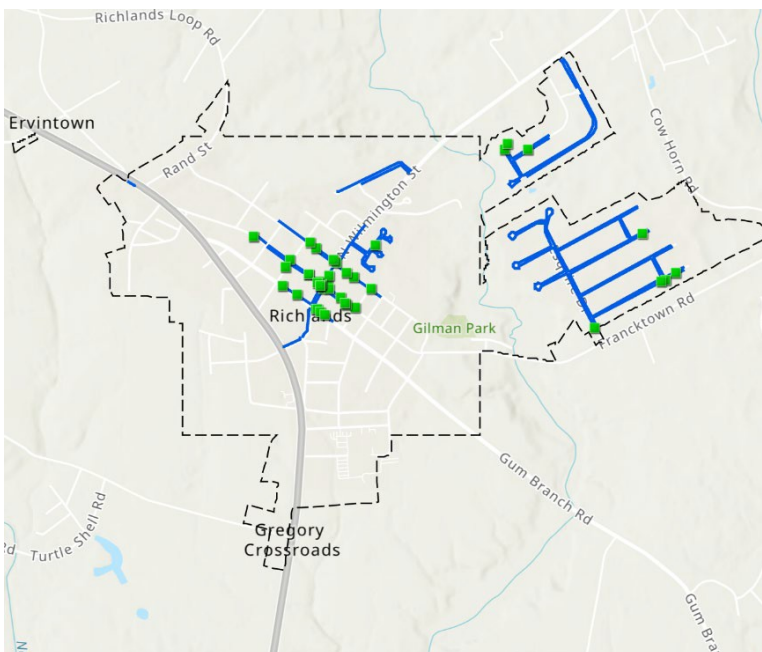
2.3 Demolition and Replacement Priority Repairs

All 43 sidewalk panels identified for demolition and replacement had at least 4 cracks or if fewer than 4 cracks had VHD or other issues qualifying them for priority.

2.4 Demolition and Replacement Estimated Repair Cost

Demolition and Replacement costs are estimated at \$10/square foot. A prioritized summary of repair costs is provided in Appendix B - Sidewalk Asset Management Plan.

2.5 Demolition and Replacement Locations and Example



3.0 Curb Ramps

3.1 Assessment Specification

Curb ramps were assessed for following criteria:

- Existing Curb Ramp Width
- Absence of Curb Ramp

3.2 Assessment Results

There were 64 ramps assessed for ramp width of at least 4 ft. There were no ramps found deficient based on this criteria.

There were 30 locations found where no curb ramp exists.

3.3 Priority Repairs

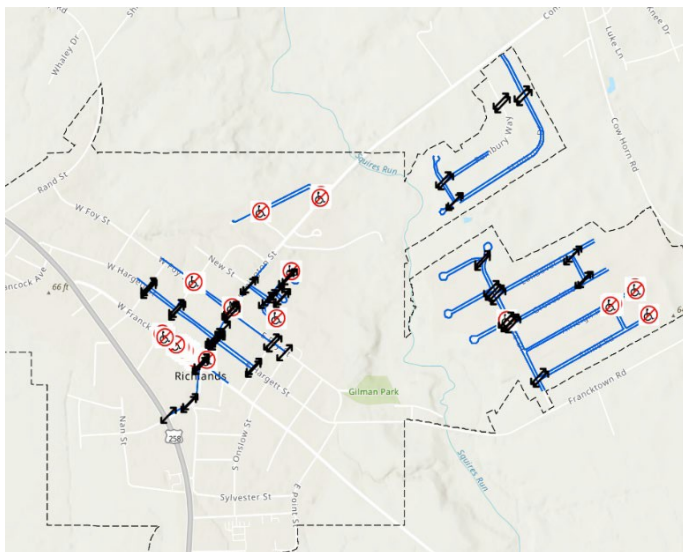
All missing curb ramps (30) are considered priority repairs.

3.4 Estimated Repair Costs

The estimated cost to install a new curb ramp is \$2,500. This price can vary based upon the ramp type required (parallel, perpendicular, etc.). A prioritized summary of repair costs is provided in Appendix B - Sidewalk Asset Management Plan.

3.5 Locations and Examples of Curb Ramps

Locations with Existing Curb Ramps and Missing Ramps



4.0 Absence of Detectable Warning Surfaces

4.1 Assessment Specification

Existing curb ramps were assessed for following criteria:

- Absence of approved Detectable Warning Surface

4.2 Assessment Results

There were 35 curb ramps that did not have appropriate detectable warning surfaces installed.

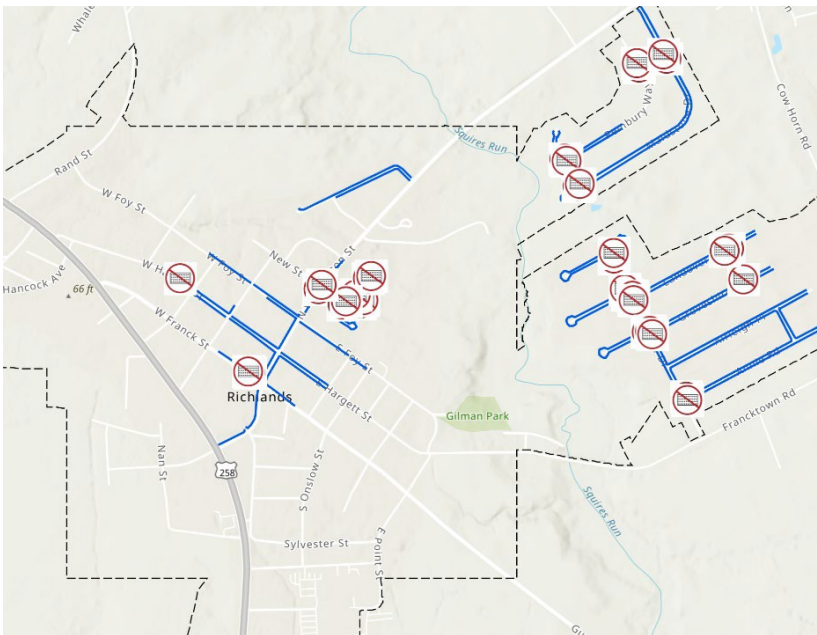
4.3 Priority Repairs

All missing detectable warning surface locations are considered priority repairs.

4.4 Estimated Repair Costs

The estimated cost to install a NC DOT approved Detectable Warning Surface is approximately \$350. This price can vary based upon ramp type and width of the ramp at curb level. A prioritized summary of repair costs is provided in Appendix B - Sidewalk Asset Management Plan.

4.5 Locations and Examples of Missing Detectable Warning Surfaces



APPENDIX A – SCOPE OF SELF-ASSESSMENT

Scope of Services as Defined by Town of Richlands

Customer	Town of Richlands		
Contact Name	Gregg Whitehead	# 910-324-3301	
Estimated Sidewalk Miles	# 10		
PSS Contact	Gail Leighton	# 919-656-6051	
ADA TRANSITION PLAN & CONDITION STUDY DEFICIENCIES			
<i>Select Services to Include in Scope of Services</i>			
<i>S - Simple / C - Complex</i>			
BASE DEFICIENCIES		YES	NO
S	Right of Way Sidewalk Miles	x	
S	Vertical Height Displacement	x	
S	Absence of Curb Ramps	x	
S	Absence of Detectable Warnings	x	
S	Demolition & Replacement	x	
RAMPS		YES	NO
C	Ramp Running Slope		
C	Ramp Cross Slope		
S	Ramp Width	x	
C	Flare Slope (where applicable)		
C	Landing Size 4 x 4		
C	Landing Slope		
C	Gutter Pan size		
C	Asphalt depth over Gutter Pan *		
SIDEWALKS		YES	NO
C	Cross Slopes		
C	Vegetative Barriers		
C	Sidewalk width <4ft		
C	Gaps <100ft		
C	Gaps >100 ft		
C	Elevation difference between top of curb and near sidewalk edge		
DRIVEWAYS		YES	NO
C	Return Radius		
C	Width at Point of Curvature		
C	Within Verge, location, width, condition		
CROSSWALKS		YES	NO
C	Longitudinal slope within crosswalk		
C	Cross slope within crosswalk		
TECHNOLOGY		YES	NO
S	ArcGIS	x	
S	QA/QC 2 stages		
C	QA/QC 3 stages (Sub 1 Meter Accuracy)		

Scope of Services as Defined by Town of Richlands (cont.)

PROXIMITY ELEMENTS		YES	NO
C	<i>Ponding (Water, Debris, Limits)</i>		
C	<i>Walls (Location, Type, Condition)</i>		
C	<i>Exposed Utilities (Water Meters, 55 Clean Outs, Valves, HH Vaults)</i>		
C	<i>Power Poles (Geometric Center, Diameter, Guy Anchor Location)</i>		
C	<i>Trees, Stumps (Species, Type, Location, Size)</i>		
EQUITY LENS		YES	NO
C	<i>Disability Accessibility Indicators</i>		
C	<i>LEP Indicators</i>		
C	<i>Graffiti / Vandalism</i>		
C	<i>School Zones</i>		
C	<i>Footpaths where there is no sidewalk present on road shoulders</i>		
C	<i>Foot stops</i>		
C	<i>Bus stops / stations</i>		
C	<i>Vacant lots / buildings</i>		
C	<i>Social services facilities</i>		
C	<i>Community facilities</i>		
C	<i>Commercial arts & cultural establishments</i>		
C	<i>PAC (Crime) districts</i>		
C	<i>Neighborhood districts</i>		
ADA TRANSITION PLAN		YES	NO
C	<i>Full Plan Development</i>		
C	<i>Staff Training</i>		
C	<i>ADA Transition Plan Consulting (Steps 1-5)</i>		
C	<i>Implementation Plan Development</i>		
C	<i>Asset Management Plan Development</i>		
C	<i>Community Engagement</i>		
OTHER/REQUESTS		YES	NO
C	<i>Signs in Right of Way</i>		
	<i>Please Specify:</i>		
	<i>Please Specify:</i>		

APPENDIX B – SIDEWALK ASSET MANAGEMENT PLAN

Summary of Repair Costs by Deficiency Category

Deficiency Type	# of Deficiencies	Repair Cost	\$Avg/Repair
Detectable Warnings	35	\$ 12,250.00	\$ 350.00
No Curb Ramp	30	\$ 75,000.00	\$ 2,500.00
Vertical Height Displacement	307	\$ 29,794.85	\$ 97.05
Demolish and Replace	43	\$ 25,140.00	\$ 584.65
Total Cost	415	\$ 142,184.85	\$ 342.61

Plan Schedule By Deficiency Category

CURB RAMPS/DETECTABLE WARNINGS			Urgent < 1 Yr			Significant <=3 Yrs			Schedule <=5 YR			Total by Category			
Repair Mode/Priority	# Loc	per Ramp	Cost	# Loc	per Ramp	Cost	# Loc	per Ramp	Cost	# Loc	per Ramp	Cost	# Loc	per Ramp	Cost
Detectable Warnings	7	\$ 350.00	\$ 2,450.00	14	\$ 350.00	\$ 4,900.00	14	\$ 350.00	\$ 4,900.00	35	\$ 350.00	\$ 12,250.00			
No Curb Ramp	6	\$ 2,500.00	\$ 15,000.00	12	\$ 2,500.00	\$ 30,000.00	12	\$ 2,500.00	\$ 30,000.00	30	\$ 2,500.00	\$ 75,000.00			
Total Cost by Deficiency Type	13		\$ 17,450.00	26	2500	\$ 34,900.00	26		\$ 34,900.00	65		\$ 87,250.00			
VERTICAL HEIGHT DISPLACEMENT			Urgent < 1 Yr			Significant <=3 Yrs			Schedule <=5 YR			Total by Category			
Repair Mode/Priority	# Loc	Sq Ft	Cost	# Loc	Sq Ft	Cost	# Loc	Sq Ft	Cost	# Loc	Sq Ft	Cost	# Loc	Sq Ft	Cost
Small	0	0	\$ -	100	2100	\$ 8,295.00	88	1848	\$ 7,299.60	188	3948	\$ 15,594.60			
Medium	23	697	\$ 2,753.15	40	1334	\$ 5,269.30	40	1334	\$ 5,269.30	103	3365	\$ 13,291.75			
Large	16	563	\$ 2,223.85	0	0	\$ -	0	0	\$ -	16	563	\$ 2,223.85			
Total Cost by Deficiency Type	39	1260	\$ 4,977.00	140	3434	\$ 13,564.30	128	3182	\$ 12,568.90	307	7876	\$ 31,110.20			
DEMO & REPL PANELS			Urgent < 1 Yr			Significant <=3 Yrs			Schedule <=5 YR			Total by Category			
Repair Mode/Priority	# Loc	Sq Ft	Cost	# Loc	Sq Ft	Cost	# Loc	Sq Ft	Cost	# Loc	Sq Ft	Cost	# Loc	Sq Ft	Cost
Panel Replacement	10	585	\$ 5,850.00	18	1053	\$ 10,530.00	15	877.5	\$ 8,775.00	43	2515.5	\$ 25,155.00			
Total Cost by Deficiency Type	10	585	\$ 5,850.00	18	1053	\$ 10,530.00	15	877.5	\$ 8,775.00	43	2515.5	\$ 25,155.00			
TOTALS			Urgent < 1 Yr			Significant <=3 Yrs			Schedule <=5 YR			Plan Total			
	# Loc	Sq Ft	Cost	# Loc	Sq Ft	Cost	# Loc	Sq Ft	Cost	# Loc	Sq Ft	Cost	# Loc	Sq Ft	Cost
ESTIMATED COST BY SCHEDULE	62	1845	28277	184	6987	58994.3	169	4059.5	56243.9	415	10391.5	\$ 143,515.20			

APPENDIX B

Public Notification

Plan Checklist

TRANSITION PLAN REVIEW CHECKLIST		Check One	
		YES	NO
1	Does the municipality have 50 or more employees? 28CFR 35.150(d)(l)	x	
	If YES, a transition plan is required.		
2	Identify the municipality's ADA Coordinator by name and title: 28 CFR 35.107(a)		
	Name & Title: Jonathan Jarman, Public Works Director		
	• Is the coordinator's contact information made readily available to the public?	x	
3	Does the municipality have an ADA position statement? APPENDIX B		
	28CFR 35.106	x	
	• If yes, is the position statement readily available to all interested parties?	x	
4	Does the municipality have a complaint/grievance process? APPENDIX B		
	28 CFR 35.107(b)	x	
5	Does the municipality have a record of a self-evaluation of services, policies, and practices?	x	
	28 CFR 35.105(a)		
6	Does the municipality have a transition plan? ADOPTION DATE		
	28 CFR 35.150(d)(l)		
7	Is there a clear designation of the person responsible for the Transition Plan?		
	28 CFR 35.150(d)(3)(iv)	x	
8	Are the self-evaluation and transition plan available for public inspection?		
	28 CFR 35.105©; 28 CFR 35.150(d)(l)	x	
9	Were interested parties allowed to provide comment/feedback during the self-evaluation and transition plan process? APPENDIX B, C & D	x	
	28 CFR 35.150(d)91); 28 CFR 35.105(b)		
	• If yes, is there a description of the process which allowed public to readily access and submit comments for both self-evaluation and transition plan?	x	
	• If yes, is there a list of the interested persons consulted?	x	
10	Are there inventories of the municipality's facilities identifying any existing barriers? (Intersection information, curb ramps, sidewalks, and other accessibility elements) APPENDIX A	x	
	28 CFR 35.150(d)(3)U); 28 CFR 35.105(a)		
	• Vertical facilities (administration buildings, museums, community centers, etc.)?		
	• Pedestrian facilities (sidewalks, intersections, curb cuts/ramps, etc.)?	x	
	• If no inventories exist is there an action plan established for producing the inventories?		
11	Does the municipality have a schedule/plan for removing barriers identified in its facility inventory? PG. 5 ACTION PLAN TIMELINE & APPENDIX A	x	
	28 CFR 35.150(d)(2); 28 CFR 35.150(d)(3)		
12	Does the municipality have a clear and detailed description of methods used to make facilities accessible?		
	28 CFR 35.150(d)(3)(ii)		

Resolution of Support



RESOLUTION 2021-03

A RESOLUTION IN SUPPORT OF THE AMERICANS WITH DISABILITIES ACT SECTION 504

WHEREAS, the Town of Richlands prohibits discrimination on the basis of disability with respect to all terms and conditions of employment and access to its activities, programs, and services; and

WHEREAS, any interference, coercion, restraint, retaliation, or reprisal of any person alleging disability discrimination is prohibited; and

WHEREAS, for the purposes of this policy, an individual with a disability is defined as any person who:

1. Has a physical or mental impairment that substantially limits one or more major life activities;
2. Has a record of such an impairment; or
3. Is regarded as having such impairment,

WHEREAS, the Town of Richlands is committed to:

1. Providing reasonable accommodation for an individual with a disability to participate in employment, activities, programs, and services and has established procedures to allow persons with a disability to request reasonable accommodation;
2. Providing access to persons using its facilities, building, and town-maintained roads, sidewalks, and crosswalks;
3. Ensuring that communications with applicants, participants, beneficiaries, members of the public, and companions with disabilities are as effective as communications with others;
4. Auxiliary aids/services are provided upon request to individuals with a disability.

NOW, THEREFORE BE IT RESOLVED by the Board of Alderman of the Town of Richlands that the Town of Richlands has an ADA Coordinator who can answer ADA related questions and handle reasonable accommodation requests as well as provide information on established procedures for filing a complaint alleging discrimination on the basis of a disability. The ADA Coordinator can be contacted at (910) 324-3301 or by mail at PO Box 245 Richlands, NC 28574. Any questions or comments concerning this policy should be referred to the ADA Coordinator.

ADOPTED, this the 14th day of September, 2021.


McKinley D. Smith, Mayor

ATTEST:



Doreen Putney, Town Clerk

PIM | PRECISION
INFRASTRUCTURE
MANAGEMENT

2021 PIM CS LLC – Proprietary and Confidential

Grievance Procedure



AMERICANS WITH DISABILITIES ACT- GRIEVANCE PROCEDURE

This Grievance Procedure has been established to meet the requirements of the Americans with Disabilities Act of 1990 ("ADA"). Any individual looking to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or facilities of the Town may review the procedure and submit a grievance report form.

The complaint should be in writing and may be submitted using the Town's Grievance Form. This form can be found under the ADA Transition Plan tab on the Town's website. 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. All received complaints will be kept confidential.

The complaint should be submitted by the grievant and/or his/her designee as soon as possible but no later than sixty (60) calendar days after the alleged violation took place. Complaints should be submitted to:

ADA Coordinator

Mr. Johnathan Jarman
Public Works Director

Phone: 910-324-3301

Email: publicworks@richlandsnc.gov

Postal Delivery: Town of Richlands
P.O. Box 245
Richlands, NC 28574

In Person: Department of Public Works
302 S. Wilmington St.
Richlands, NC 28574

Within fifteen (15) calendar days after receipt of the complaint, the ADA Coordinator will contact the grievant to discuss the complaint and the possible resolutions. Within fifteen (15) calendar days of the meeting, the ADA Coordinator will respond in writing, and where appropriate, in a format accessible to the grievant, such as large print, Braille or audio tape. The response will explain the position of the Town of Richlands regarding the complaint and, when appropriate, offer options for substantive resolution of the complaint.

If the response by the City's ADA Coordinator does not satisfactorily resolve the issue, the grievant and/or his/her designee may appeal the decision within fifteen (15) calendar days after receipt of the response to the Town Administrator of the Town of Richlands.

Within fifteen (15) calendar days after receipt of the appeal, the Town Administrator will meet with the grievant to discuss the complaint and possible resolutions. Within fifteen (15) calendar days after the meeting, the Town Administrator will respond with the Town's final position on the issue. The response will be in writing and, if necessary, an alternative format that is accessible to the grievant.

All written complaints received by the ADA Coordinator, appeals to the Town Administrator, and responses from these two officers will be retained by the Town of Richlands for at least three years.

Grievance Form



**Title II of the Americans with Disabilities Act Section 504 of
the Rehabilitation Act of 1973**

GRIEVANCE FORM

Name:-----

Home **Address:**-----

City, State, and Zip Code: _____

Home Telephone: _____ Business/Cell Phone: _____

Email **Address:**-----

This section to be completed only if the aggrieved person is not the individual completing this form.

Reporting Individual:-----

Person(s) Affected by the Situation (if other than reporting individual): _____

Address:-----

City, State, and Zip Code: _____

Preferred Telephone or Email: _____

Program/Activity/Facility Alleged to Be Inaccessible: _____

When did the situation occur? (date, and time): _____

Describe the situation or way in which the program is not accessible, providing the name(s) where possible of the individuals who were involved in the situation (please attach additional pages as needed).

Have efforts been made to resolve this complaint through the Request for Accommodation with the ADA Coordinator? YES__ NO__

If yes, what were the results? _____

Signature: _____ Date: _____

Send or deliver to: **Johnathan Jarman**
ADA Coordinator
Public Works Director
P.O. Box 24S
Richlands, NC 28574
(910) 324-3301
Email: publicworks@richlandsnc.gov

Upon request, reasonable accommodation will be provided in completing this form or copies of the form. Please contact the ADA Compliance Coordinator.



AMERICANS WITH DISABILITIES ACT (ADA) TRANSITION PLAN

Community Engagement Survey on Accessibility

The Town of Richlands is producing an ADA Transition Plan and requests your input!

The ADA Transition Plan is a comprehensive plan for improving access for individuals with disabilities to Town facilities, parks, programs, services, activities, and events. It is part of the Town of Richlands' continued efforts to welcome and serve all members of the community. By updating and implementing the Transition Plan, consistent with the ADA, Town services and facilities will become more comfortable, welcoming, and accessible to everyone.

The Town is seeking input from individuals with disabilities, patrons, caregivers, organizations, and agencies that support individuals with disabilities as well as from interested individuals with experience in accessibility needs and best practices. This community involvement will help the Town with its self-evaluation process and better enable us to address and prioritize current and future accessibility needs.

The Town and its consultants have prepared this survey to help evaluate community perspectives on accessibility to Town programs, services, and facilities. The survey will be available through **October 15, 2021**.

The Town of Richlands is asking for your input by completing this questionnaire that addresses accessibility of services and activities offered to the public. Examples include: obtaining a permit, paying a fee, participating in a recreational program, or attending a public meeting. All responses are subject to becoming public record.

The purpose of this questionnaire is to gather information on how Town services are, or are not, accessible to people with disabilities. The goal is that each service is readily accessible to and usable by persons with disabilities.

Please complete the following:

Name: _____
 Address _____
 Email _____
 Phone _____
 _____ I choose to remain anonymous

1. What best describes your association with the Town of Richlands?
 ___ Community Member or Visitor with a Disability
 ___ Community Member or Visitor without a Disability
 ___ Community Organization: Please list name
 ___ Work in Richlands
2. Do you participate in programs, services or activities offered by the Town of Richlands?
 ___ No
 ___ Yes, please describe
3. What is your normal mode of transportation? (Select one)
 ___ Car / Van
 ___ Bus
 ___ Ride-hailing apps
 ___ Bicycle
 ___ Walking / Wheeling
 ___ Other (Please specify)
4. Do you have any specific compliments, concerns, complaints, or problems with access for persons with disabilities to any of the programs, services or activities provided by the Town of Richlands?
 ___ No
 ___ Yes, please describe
5. Do you know the person you should contact if you need assistance, have a concern or complaint, or need an accommodation to access a facility, service, or event?
 ___ No, I do not know
 ___ Yes, please share name and/or title _____

6. Have you ever requested an accommodation for a disability from the Town ?
___ No
___ Yes, please describe _____

7. If you answered "yes" to Question #6, was accommodation provided?
___ No
___ Yes
___ Yes, but I was dissatisfied with the accommodation (please explain) _____

8. Are Town of Richlands staff generally helpful, supportive, and positive in solving accessibility issues for persons with disabilities?
___ Yes
___ Somewhat
___ Do not know
___ No (please explain) _____
9. What do you think should be the highest priority of the Town of Richlands to improve accessibility for persons with disabilities? Please rank the following from 1 to 6 with 1 having the highest priority:
___ Sidewalks
___ Crosswalks
___ Curb Ramps
___ Facilities
___ Parks
___ Other (please explain) _____
10. Do you have any particular concerns regarding accessibility in any Richlands parks or public facilities? You can submit as many as you like: _____

11. Please list the general address or area of sidewalk in Richlands that you find particularly unusable/dangerous and why. You can submit as many as you like: _____

12. What conditions along Town streets / sidewalks affect your walking habits? (Rank in order from 1-6 with 1 being the most critical)

- ☐ Proximity to motor vehicles / driver
- ☐ Unsafe street crossings
- ☐ Sidewalks in poor condition or missing sections (gaps)
- ☐ Missing or difficult curb ramps
- ☐ Obstructions
- ☐ Poor lighting

Thank you for answering the questions. Your answers will help Town administration, departments and all the people we serve. Please return the completed survey to Town Hall or directly to the ADA Coordinator.

APPENDIX C

Public Engagement Survey Results

Americans with Disabilities Act (ADA) Transition Plan: Town of Richlands Community Engagement Survey on Accessibility

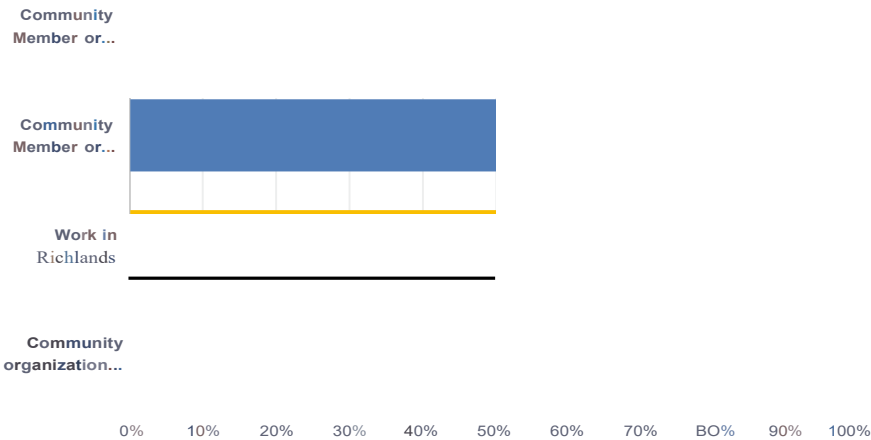
Q1 Personal Information (leave blank if you wish to remain anonymous)

Answered: 1 Skipped: 1

ANSWER CHOICES	RESPONSES	
Name	100.00%	1
Company	0.00%	0
Address	100.00%	1
Address 2	0.00%	0
City/Town	100.00%	1
State/Province	100.00%	1
ZIP/Postal Code	100.00%	1
Country	100.00%	1
Email Address	100.00%	1
Phone Number	0.00%	0

Q2 What best describes your association with the Town of Richlands?

Answered: 2 Skipped: 0

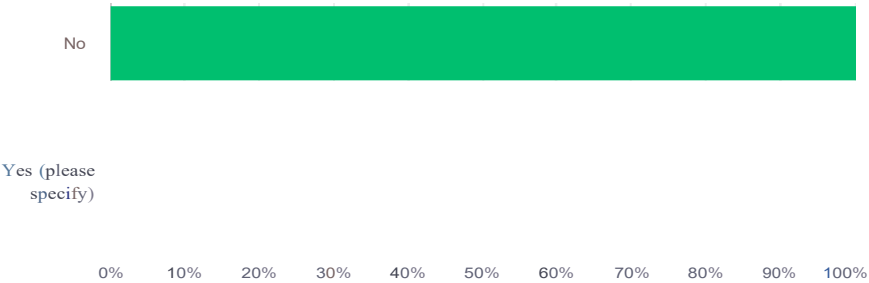


Americans with Disabilities Act (ADA) Transition Plan: Town of Richlands Community Engagement Survey on Accessibility

ANSWER CHOICES	RESPONSES	
Community Member or Visitor with a Disability	0.00%	0
Community Member or Visitor without a Disability	50.00%	1
Work in Richlands	50.00%	1
Community organization (please specify)	0.00%	0
TOTAL		2

Q3 Do you participate in programs, services, or activities offered by the Town of Richlands?

Answered: 2 Skipped: 0

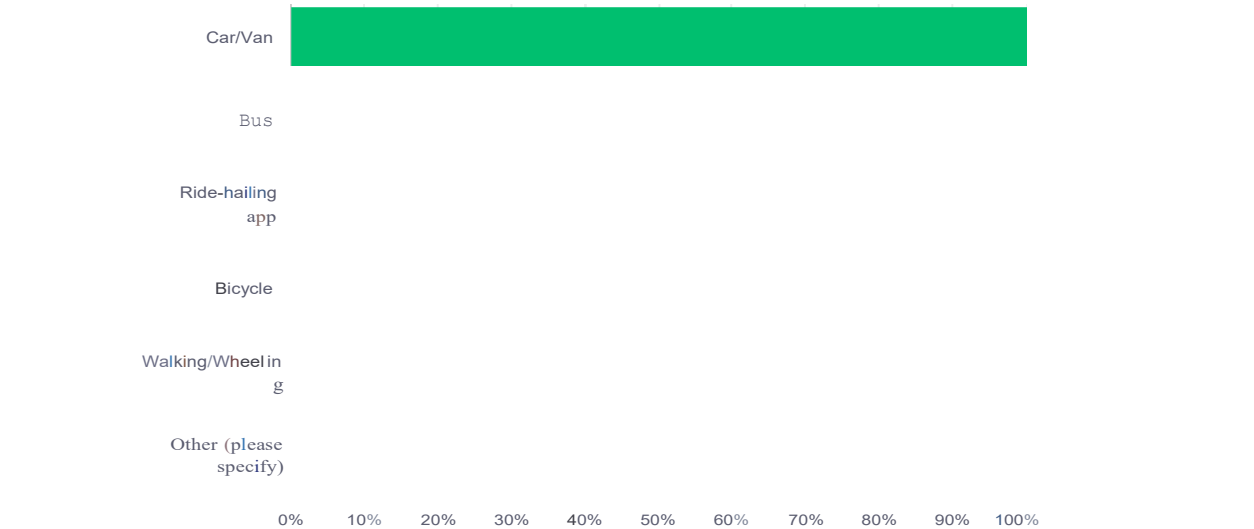


ANSWER CHOICES	RESPONSES	
No	100.00%	2
Yes (please specify)	0.00%	0
TOTAL		2

Q4 What is your normal mode of transportation? (Select one)

Answered: 2 Skipped: 0

Americans with Disabilities Act (ADA) Transition Plan: Town of Richlands Community Engagement Survey on Accessibility

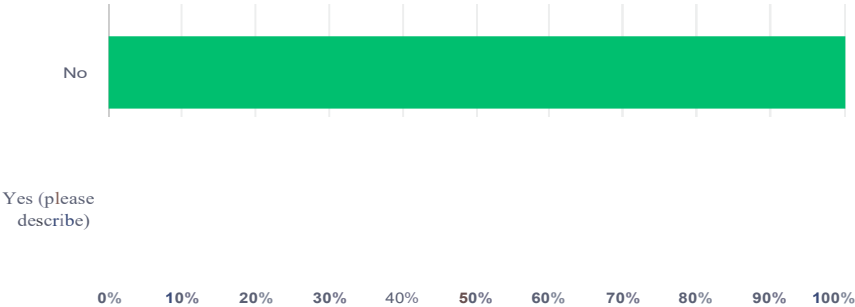


ANSWER CHOICES	RESPONSES	
Car/Van	100.00%	2
Bus	0.00%	0
Ride-hailing app	0.00%	0
Bicycle	0.00%	0
Walking/Wheeling	0.00%	0
Other (please specify)	0.00%	0
TOTAL		2

Q5 Do you have any specific compliments, concerns, complaints, or problems with access for persons with disabilities to any of the programs, services or activities provided by the Town of Richlands?

Answered: 2 Skipped: 0

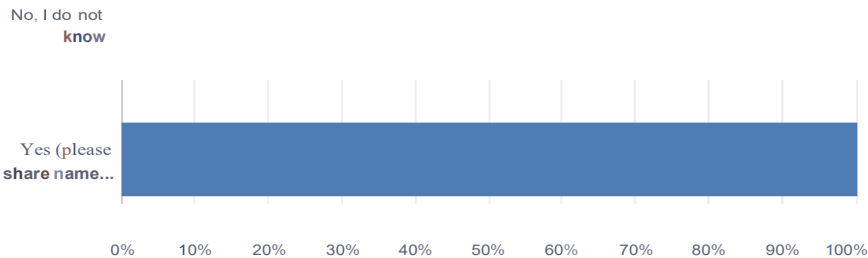
Americans with Disabilities Act (ADA) Transition Plan: Town of Richlands Community Engagement Survey on Accessibility



ANSWER CHOICES	RESPONSES	
No	100.00%	2
Yes (please describe)	0.00%	0
TOTAL		2

Q6 Do you know the person you should contact if you need assistance, have a concern or complaint, or need an accommodation to access a facility, service, or event?

Answered: 2 Skipped: 0

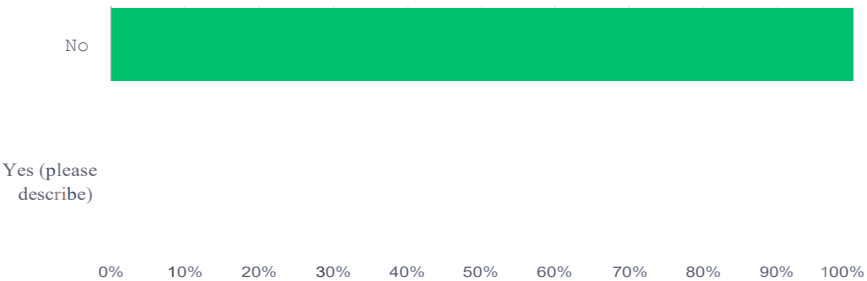


ANSWER CHOICES	RESPONSES	
No, I do not know	0.00%	0
Yes (please share name and/or title)	100.00%	2
TOTAL		2

Q7 Have you ever requested an accommodation for a disability from the Town?

Answered: 2 Skipped: 0

Americans with Disabilities Act (ADA) Transition Plan: Town of Richlands Community Engagement Survey on Accessibility



ANSWER CHOICES	RESPONSES	
No	100.00%	2
Yes (please describe)	0.00%	0
TOTAL		2

QB If you answered "yes" to the previous question, was accommodation provided?

Answered: 0 Skipped: 2

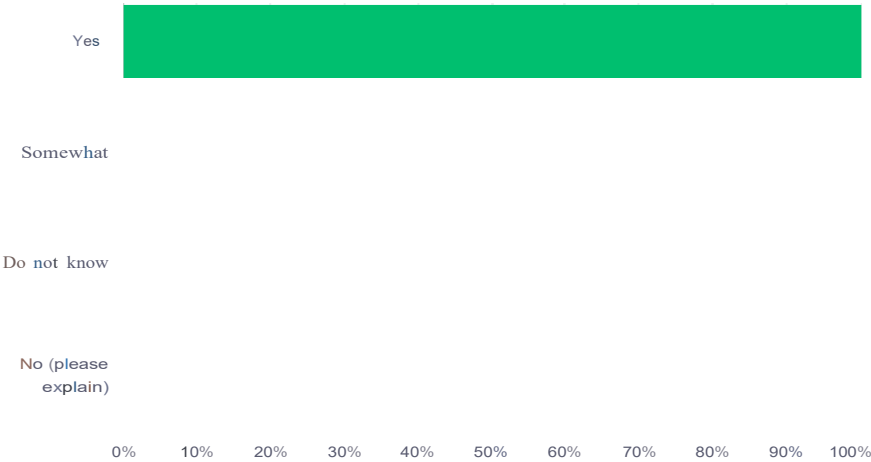
A No matching responses.

ANSWER CHOICES	RESPONSES	
No	0.00%	0
Yes	0.00%	0
Yes, but I was dissatisfied with the accommodation (please explain)	0.00%	0
TOTAL		0

Q9 Are Town of Richlands staff generally helpful, supportive, and positive in solving accessibility issues for persons with disabilities?

Answered: 2 Skipped: 0

Americans with Disabilities Act (ADA) Transition Plan: Town of Richlands Community Engagement
Survey on Accessibility

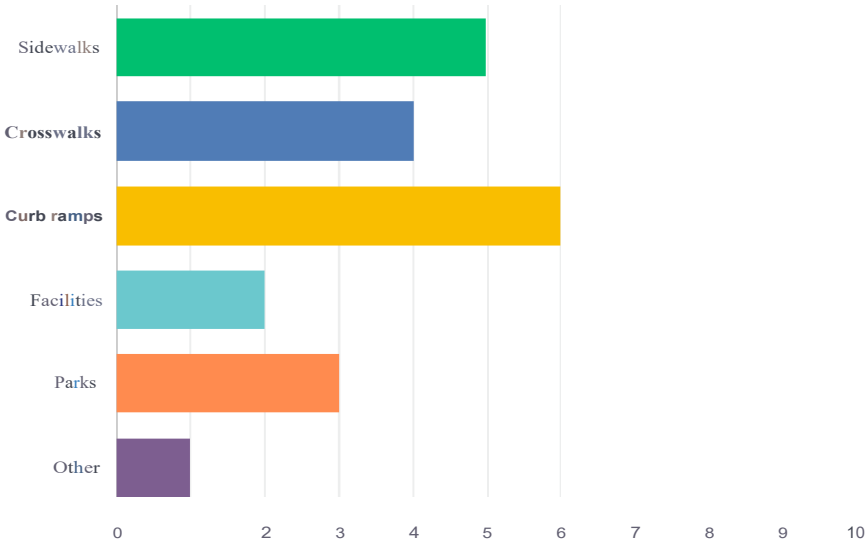


ANSWER CHOICES	RESPONSES	
Yes	100.00%	2
Somewhat	0.00%	0
Do not know	0.00%	0
No (please explain)	0.00%	0
TOTAL		2

Q10 What do you think should be the highest priority of the Town of Richlands to improve accessibility for persons with disabilities? Please rank the following from 1 to 6 with 1 having the highest priority:

Ans-verified: 1 Skipped: 1

Americans with Disabilities Act (ADA) Transition Plan: Town of Richlands Community Engagement Survey on Accessibility



	1	2	3	4	5	6	TOTAL	SCORE
Sidewalks	0.00% 0	100.00% 1	0.00% 0	0.00% 0	0.00% 0	0.00% 0	1	5.00
Crosswalks	0.00% 0	0.00% 0	100.00% 1	0.00% 0	0.00% 0	0.00% 0	1	4.00
Curb ramps	100.00% 1	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	1	6.00
Facilities	0.00% 0	0.00% 0	0.00% 0	0.00% 0	100.00% 1	0.00% 0	1	2.00
Parks	0.00% 0	0.00% 0	0.00% 0	100.00% 1	0.00% 0	0.00% 0	1	3.00
Other	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	100.00% 1	1	1.00

Q11 Please explain if you answered "Other" to the previous question.

Answered: 0 Skipped: 2

Q12 Do you have any particular concerns regarding accessibility in any Richlands parks or public facilities? You can submit as many as you like:

Answered: 0 Skipped: 2

Q13 Please list the general address or area of sidewalk in Richlands that you find particularly unusable/dangerous and why. You can submit as

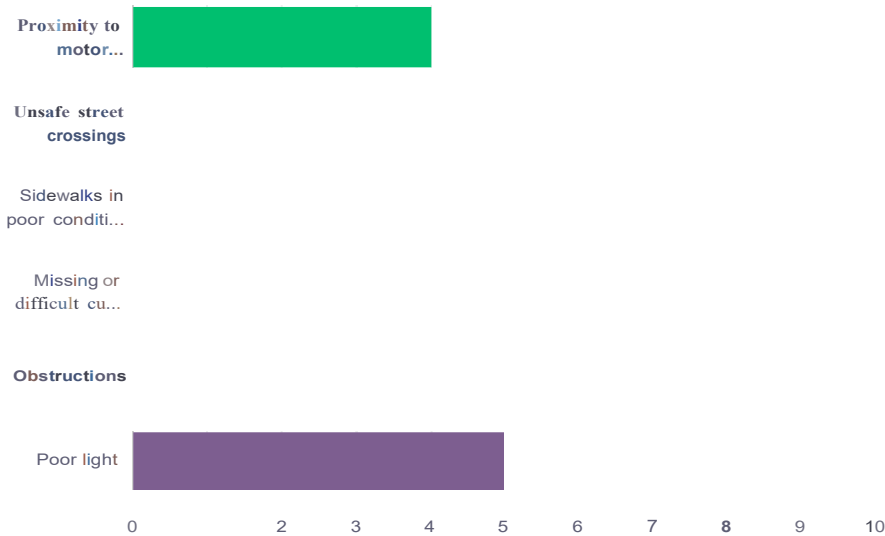
Americans with Disabilities Act (ADA) Transition Plan: Town of Richlands Community Engagement
Survey on Accessibility

many as you like:

Answered: 1 Skipped: 1

Q14 What conditions along Town streets/ sidewalks affect your walking habits? (Rank in order from 1-6 with 1 being the most critical)

Answered: 1 Skipped: 1



	1	2	3	4	5	6	TOTAL	SCORE
Proximity to motor vehicles/driver	0.00% 0	0.00% 0	100.00% 1	0.00% 0	0.00% 0	0.00% 0	1	4.00
Unsafe street crossings	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0	0.00
Sidewalks in poor condition or missing sections (gaps)	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0	0.00
Missing or difficult curb ramps	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0	0.00
Obstructions	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0	0.00
Poor light	0.00% 0	100.00% 1	0.00% 0	0.00% 0	0.00% 0	0.00% 0	1	5.00

APPENDIX D

Public Notice



The Town of Richlands is committed to ensuring equal access to all of its facilities, services, programs, and events and making sure we are compliant with the policies of the Americans with Disabilities Act (ADA). We have added a Public Notice to our website affirming our intent of full ADA compliance, will be establishing a Grievance Procedure to address instances of non-compliance and are also in the process of conducting a Self-Evaluation and preparing a Transition Plan to become fully ADA compliant.

Visit our website at www.richlandsnc.gov and click on ADA Transition Plan to view ongoing efforts.

APPENDIX E

ADA Plan Contact Information

ADA Coordinator

Mr. Johnathan Jarman
Public Works Director

Phone: 910-324-3301

Email: publicworks@richlandsnc.gov

Postal: Town of Richlands
P.O. Box 245
Richlands, NC
28574

In Person: Department of Public Works
302 S. Wilmington
St. Richlands, NC
28574

ADA Transition Plan Implementation Coordinator

Mr. Gregg Whitehead
Town Manager

Phone: 910-324-3301

Email: administrator@richlandsnc.gov

Postal: Town of Richlands
P.O. Box 245
Richlands, NC
28574

In Person: Town Manager
302 S. Wilmington
St. Richlands, NC
28574