CITY OF ATLANTA
LAWSON CONSENT DECREE
ADA SELF-EVALUATION

2025

PREPARED BY THE

ATLANTA DEPARTMENT OF TRANSPORTATION

CITY OF ATLANTA

DEPARTMENT OF TRANSPORTATION

CONTENTS

1. PURPOSE

The Americans with Disabilities Act ("ADA") is in place to ensure that people with disabilities can fully participate in all aspects of civic life. Under Title II of the ADA, all state and local governments are required to give people with disabilities an equal opportunity to benefit from their programs, services, and activities. The City of Atlanta Department of Transportation ("ATLDOT") has undertaken this ADA Self-Evaluation of its Pedestrian Public Rights of Way ("PPROW") as a critical step toward achieving full compliance with the ADA, in accordance with 28 CFR 35.105 and the terms of the *Lawson* Consent Decree.[1] As approved by the Court in the *Lawson* Consent Decree, the purpose of the Self-Evaluation is to "determine elements in the PPROW that are not accessible and usable by persons with mobility-limiting impairments as determined by their lack of conformance to the Accessibility Laws and Accessibility Standards thereby warranting inclusion in the Transition Plan for Sidewalks; and, to determine whether there are deficiencies of a non-structural nature in the City's ATL-PPROW Program, including deficiencies with program access."

The City of Atlanta maintains over 1,400 centerline miles of streets within its jurisdiction and a sidewalk network that totals 37 million square feet, or over 1,157 miles of paved area. Conducted through internal reviews, stakeholder engagement, and interdepartmental collaboration, the Self-Evaluation identifies physical, programmatic, digital, and procedural barriers that limit access for people with disabilities to the City's PPROW.

[1] The Consent Decree was adopted by order of the Court in *Laurel Lawson, James Curtis, and James Turner, on behalf of themselves and other similarly situated persons v. City of Atlanta*, No. 1:18-CV-02484-SDG, on May 6, 2024, required the City to update the Self Evaluation required by the Americans with Disabilities Act.

The City is identifying all programs, activities, services, policies and procedures that are provided by the ATLDOT to improve and maintain accessibility in the PPROW, including the physical elements of the right-of-way, in order to ensure that an equal opportunity to use and enjoy the pedestrian public right-of-way is provided for people with disabilities.

The findings of the Self-Evaluation will be included in the Transition Plan as a guide for the City of Atlanta to plan accessibility compliance with the requirements of Title II of the ADA and Public Right-of-Way Accessibility Guidelines ("PROWAG") standards.

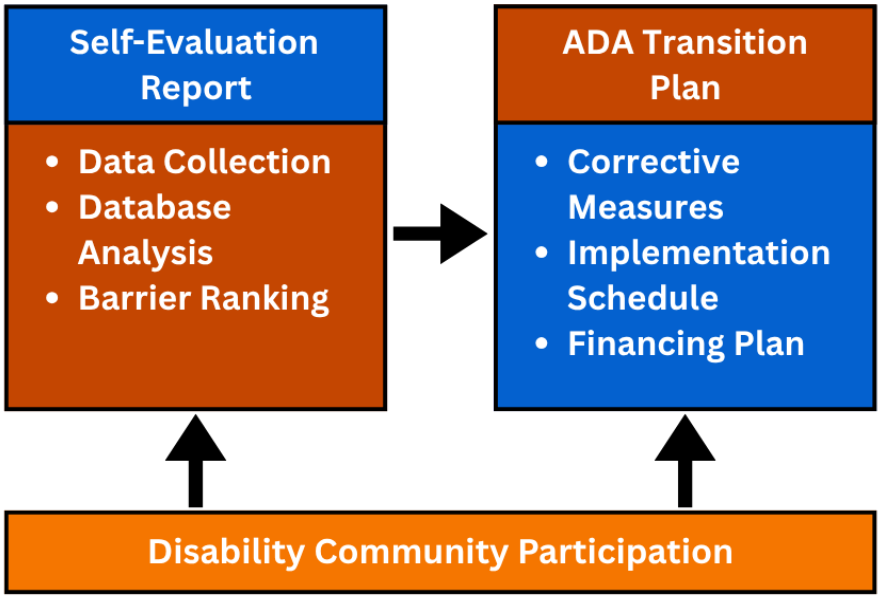
Key Areas of Evaluation Include:

- **Policies & Procedures**: Review of internal processes and standard operating procedures to ensure compliance with the ADA Title II requirements that people with disabilities have equal access to the City's PPROW.
- **Public Engagement & Communication**: Assessment of materials, public notifications, and engagement methods for accessibility and inclusion.
- **Digital Accessibility**: Evaluation of ATLDOT websites, applications, and digital documents using Web Content Accessibility Guidelines ("WCAG").
- **Facilities & Infrastructure**: Initial review of public rights-of-way assets (e.g., sidewalks, curb ramps, crosswalks) for compliance with 2010 ADA Standards and Public Right-of-Way Accessibility Guidelines ("PROWAG").
- **Program & Service Delivery**: Analysis of access to services such as permits, transit planning, and community outreach activities.
- **Training & Awareness**: Evaluation of staff training programs and organizational awareness of ADA obligations.

ATLDOT will use the Self-Evaluation to:

- Engage the public and disability community in meaningful dialogue
- Prioritize remediation efforts based on need and feasibility
- Coordinate with other City departments for systemic improvements
- Ensure that ADA compliance remains embedded in all planning and implementation efforts
- Develop its ADA Transition Plan

Relationship between the Self-Evaluation Report and the ADA Transition Plan



2. METHODOLOGY

The method for conducting the Self Evaluation for the City of Atlanta is dictated by State and Federal laws and regulations requiring, promoting, and/or encouraging equal or improved access to persons with disabilities, including, without limitation, the following: Title II of the Americans with Disabilities Act of 1990, 42 U.S.C. § 12131, et seq., and all of its implementing regulations and design standards; the Rehabilitation Act of 1973, 29 U.S.C. § 794, et seq., and all of its implementing regulations and design standards; and Georgia Code § 30-3-1. et seq., and all of its implementing regulations, building codes, and standards. The Accessibility Standards that were used to conduct the Self-Evaluation refers to the PROWAG developed by the United States Access Board.

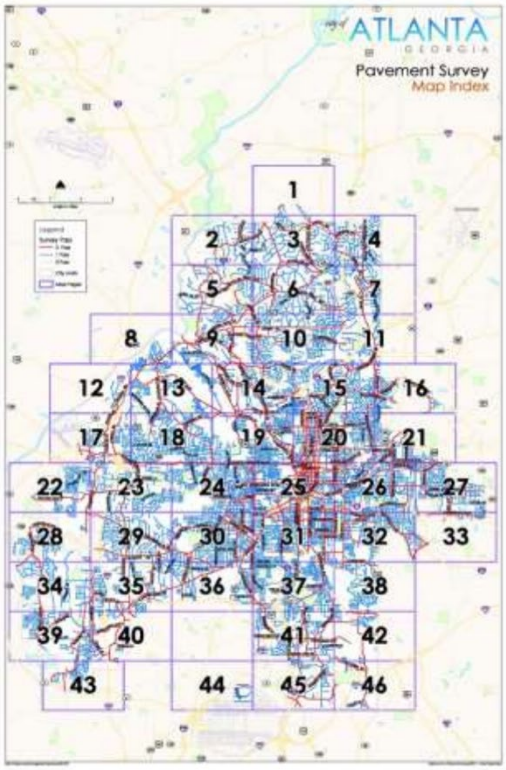


Figure 1 – Atlanta Sidewalk Grids

The methodology for this ADA Self-Evaluation involved a multi-faceted approach to gather information and assess accessibility across various aspects of ATLDOT's operations. This includes:

2.1 Policy and Procedure Review

- Review of Existing Documents: Examination of all relevant ATLDOT policies, ordinances, administrative procedures, and design standards (e.g., standard details for sidewalks, curb ramps, ADA barrier removal).
- Staff Interviews: Discussions with key ATLDOT staff across different divisions (e.g., planning, engineering, maintenance, capital delivery) to understand current practices and identify potential gaps in ADA awareness or implementation.

2.2 Facilities Inventory and Accessibility Audit

- Inventory Development: Including public rights-of-way elements such as sidewalks and curb ramps. As part of the City of Atlanta's effort to comply with Title II of the ADA, and the *Lawson* Consent Decree, the City is relying on the ARCADIS survey and manual PPROW survey performed by Peter A. Combs that are referenced and approved for use as part of the City's Self-Evaluation in the *Lawson* Consent Decree. The Combs and Arcadis surveys have been supplemented by an asset inventory assessment survey conducted by Cyvl.ai that was completed in January 2025. The Arcadis and Cyvl.ai assessments used LiDAR (Light Detection and Ranging) and photographic imaging technology to create 3d maps of the City's rights of way and associated PPROW. In addition, the City continues to evaluate its current services, policies, and practices in an effort to begin developing the Transition Plan that identifies physical and non-physical obstacles to accessibility at the pedestrian public right-of-way.

- On-site Audits: Physical inspections of a representative sample of public rights-of-way infrastructure using ADA and PROWAG.
    - *Tools Used:* Checklists based on ADAAG/PROWAG, measuring tapes, levels, cameras, and accessibility assessment software/apps. The approach to sidewalk and pedestrian ramp assessments is comprehensive in nature, and the included segments of sidewalk (approximately 1 block) are assigned 13 attributes by the field operator ranging from average slab width to the type of obstructions.

2.3 Communications and Public Information Review

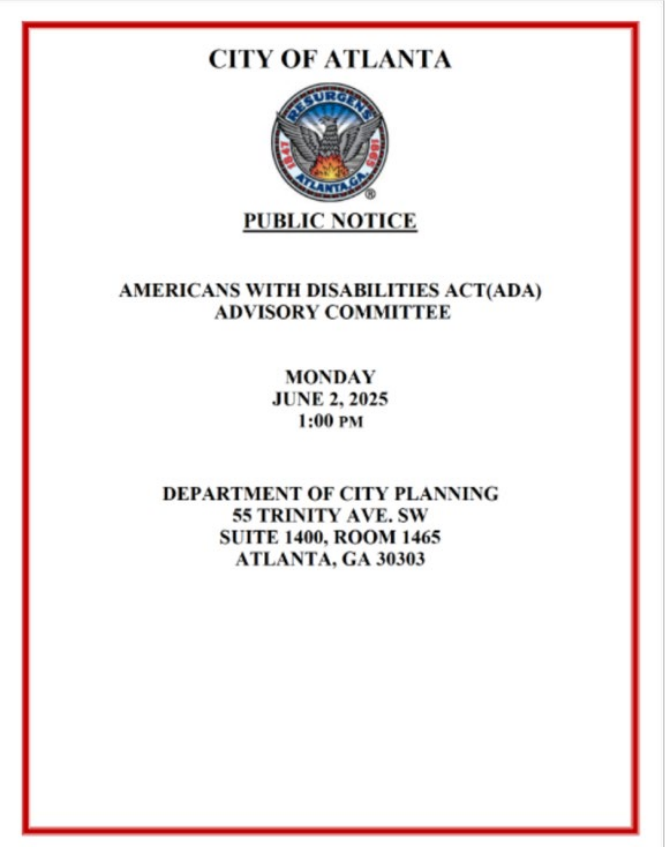
- Website Accessibility: Evaluation of ATLDOT's official website and online portals for compliance with WCAG 2.1 AA standards.
- Document Accessibility: Review of public documents, forms, and informational materials (e.g., project plans, public notices, brochures) for availability in accessible formats (e.g., large print, Braille, electronic text).
- Public Meeting Accessibility: Assessment of procedures for ensuring effective communication at public meetings, including provision of sign language interpreters, assistive listening devices, and accessible meeting locations.

2.4 Programs and Services Review

- Service Delivery Assessment: Examination of how ATLDOT delivers its various programs and services (e.g., permitting, traffic management, infrastructure projects) to ensure non-discriminatory access.
- Complaint Process Review: Assessment of the existing ADA grievance procedure, including its clarity, accessibility, and effectiveness in resolving complaints.

2.5 Public Involvement

Stakeholder Engagement: Outreach to and consultation with disability advocacy groups, individuals with disabilities, and other community stakeholders through public forums, surveys, and dedicated meetings of the ADA Advisory Committee. The City's initial meeting with the ADA Advisory Committee occurred on June 2, 2025.



CITY OF ATLANTA

PUBLIC NOTICE

AMERICANS WITH DISABILITIES ACT(ADA)
ADVISORY COMMITTEE

MONDAY
JUNE 2, 2025
1:00 PM

DEPARTMENT OF CITY PLANNING
55 TRINITY AVE. SW
SUITE 1400, ROOM 1465
ATLANTA, GA 30303

3. POLICY AND PROCEDURES

As part of the ADA Self-Evaluation process and in accordance with 28 CFR 35.105, the Department conducted a comprehensive review of its policies, ordinances, administrative procedures, and standard details to assess compliance with the ADA and identify opportunities to enhance accessibility.

3.1 Existing Policies

This review focused on determining whether ATLDOT's internal governing documents support full and equitable access to the City's transportation programs, services, and activities for individuals with disabilities. Key components of this review included:

- Departmental policies and standard operating procedures related to customer service, construction, permitting, maintenance, and project delivery
- City ordinances governing sidewalk maintenance, obstruction, design standards, and public right-of-way usage (i.e. City Code § 138-14 maintenance of sidewalks, § 138-15 Obstructing sidewalks by display or sale of goods, § 138-17 Design objectives for sidewalks)
- Standard construction details and specifications, particularly those guiding the design and installation of sidewalks and curb ramps.

Beyond the internal policy review, ATLDOT has also initiated a targeted assessment of its partnership with ATL311, the City's centralized customer service and request platform. This evaluation includes:

- Reviewing the structure and clarity of knowledge articles to ensure they are written in plain language and accessible formats
- Identifying gaps or delays in the handling of accessibility-related requests, including curb ramp installations, sidewalk obstructions, or other ADA accommodations
- Streamlining the process of providing timely and accurate information to the public through 311 channels

This collaboration with ATL311 is an important extension of ATLDOT's commitment to effective communication and responsive service delivery. By evaluating both policy frameworks and the mechanisms through which the public interacts with the City, ATLDOT is working to ensure that accessibility is integrated into every step of the service pipeline, from policy design to public response. The City is working to update its websites to provide clear and easy access to identify areas in the City that constituents believe to not be ADA compliant. By way of example, the City is currently providing a way for private citizens to request the installation of ADA ramps in the PPROW:

https://www.atl311.com/en-US/knowledgearticle/?code=KB0011420.

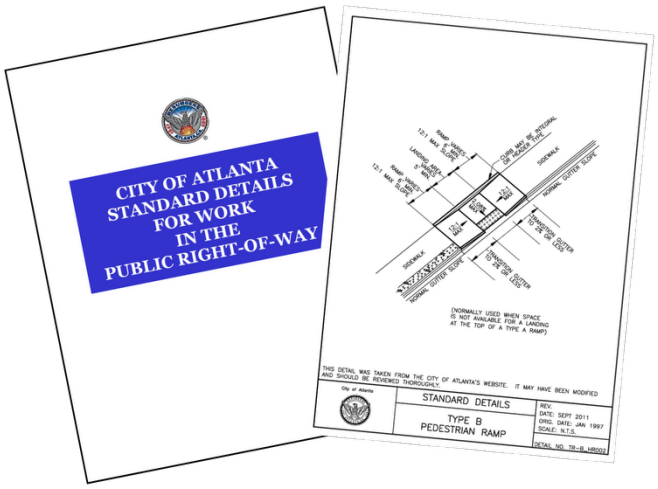
3.2 Standard details

Standard details for construction in PPROW (the "Standard Details") are published and maintained online. The Standard Details for accessible curb ramp design and accessible sidewalk design comply with the Accessibility Standards. A copy of the Standard Details is currently on the City's website:

https://www.atlantaga.gov/home/showdocument?id=64280&t=638726395258818246

Standard Details are available to all entities, including private developers performing new construction or Alterations involving the PPROW.

ATLDOT is actively reviewing and updating its Standard Construction Details to ensure full compliance with the latest PROWAG.



While ATLDOT's current details have been based on the 2010 ADA Standards and best practices for accessible design, the *Lawson* Consent Decree reinforces the City's obligation to proactively identify and remove barriers that limit access for individuals with disabilities. ATLDOT is evaluating all standard drawings and construction specifications to align more closely with PROWAG, which provides clearer, more context-sensitive design guidance for sidewalks, curb ramps, pedestrian access routes, crosswalks, and other critical pedestrian infrastructure.

3.3 Training

In consultation with the ADA Advisory Committee, the ATLDOT ADA Coordinator will develop and provide training for all plan reviewers and inspectors to the extent their jobs entail reviewing plans and/or inspecting the PPROW for compliance with the Accessibility Standards. The training will include Federal and State requirements regarding the accessibility of pedestrian routes, including, without limitation, the Accessibility Standards. All new plan reviewers and inspectors will be evaluated for appropriate knowledge of the accessibility laws and standards, and the City will include required training in its new hire orientation for all plan reviewers and inspectors who need the compliance training.

The City will require all inspectors and plan reviewers to participate in a minimum of at two (2) hours of accessibility training on an annual basis. This training shall be prescribed by the ATLDOT Commissioner and ATLDOT ADA Coordinator.

The City will also provide training to the inspectors and plan reviewers when there is a change in the law related to accessibility of right-of-way to individuals with disabilities, as determined by the ATLDOT. (**Appendix A**)

4. 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 services, activities, programs, or benefits by the City of Atlanta's Department of Transportation. The City's Personnel Policy governs employment-related complaints of disability discrimination.

The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of the 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 or the grievant's designee as soon as possible but no later than sixty (60) calendar days after the alleged violation to:

Shauncey Battle, ADA Coordinator
55 Trinity Ave SW, Atlanta, GA 30303
(404) 416-0304
Sbattle-williams@atlantaga.gov
atldot-ada@atlantaga.gov

Within thirty (30) calendar days after receipt of the complaint, the ADA Coordinator or her designee will communicate with the complainant to discuss the complaint and possible resolutions. Within thirty (30) calendar days of the meeting, the ADA Coordinator or her designee will respond in writing and in a format accessible to the complainant, such as large print, Braille,

or audio tape. The response will explain the position of ATLDOT, and if possible, offer options for substantive resolution of the complaint.

If the ADA Coordinator's response does not satisfactorily resolve the issue, the complainant may appeal the decision within fifteen (15) calendar days after receipt of the response to the Director of Accessibility and ADA Compliance.

Within thirty (30) calendar days after receipt of the appeal, the Director of Accessibility and ADA Compliance, or her designee, will make contact with the complainant to discuss the complaint and possible resolutions. Within thirty (30) calendar days after the discussion, the Director of Accessibility and ADA Compliance, or her designee, will respond in writing and in a format accessible to the complainant, with a final resolution of the complaint.

All written complaints, appeals and responses will retained by the City of Atlanta for at least three (3) years.

5. FINDINGS

The Atlanta Sidewalk survey was split into 46 separate grids that were all driven in the field and subjected to a rigorous quality control check by the Arcadis team. Below are some key indicators from the inventory assessment:

5.1 Public Right-of-Way Infrastructure

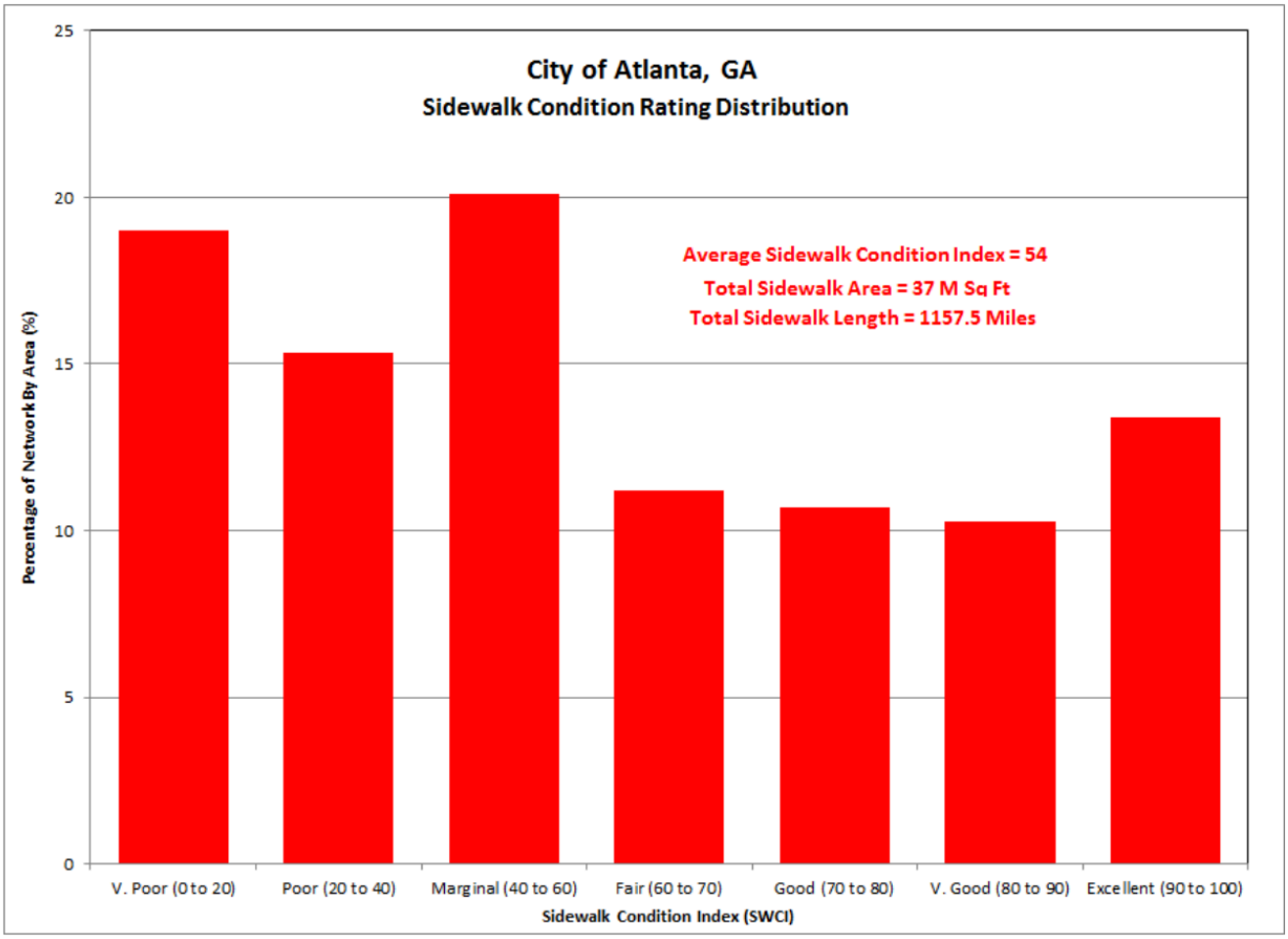
Sidewalk Condition Inventory – The average condition of a segment of sidewalk is demonstrated by a value between 1 and 100, with 100 representing the best condition possible. Atlanta sidewalks scored an average SWCI (Sidewalk Condition Index) of 54 across all 46 grids. On the Good/Fair/Poor rating scale, the City considers sidewalks that fall within this range to be Marginal. A collection of sidewalk segments and their survey condition can be found in **Appendix B**.

Sidewalk Obstruction Inventory – Obstructions are calculated and considered separately from the SWCI. Obstructions limit or, in some cases, completely restrict ADA travel. The City is in the process of evaluating how best to identify and quantify the obstructions.

Ramp Assessment Inventory – A full ADA ramp inventory and assessment for the entire City was completed, with a total ramp count for the City at 18,721. Each City grid presented its own unique ADA achievements, as well as challenges. A full inventory of these ramp assets can be found in **Appendix C**.

5.2 Summary of findings

By establishing procedures to assess, repair, and maintain the sidewalks, The City will not only provide access for all pedestrians but will develop an important step in the process of identifying the correct costs for maintenance of sidewalks and for construction of new ADA compliant assets. The sidewalk network totals 37 million square feet, or over 1,157 miles of paved area, with the average condition falling into a Marginal SWCI category with an average condition rating of 54.



Reporting Data 2020

The SWCI is used to classify the overall condition of sidewalks. It should be noted that sidewalk obstructions are not included in the analysis but are identified later in the Self-Evaluation. A detailed breakdown of the condition categories is provided below:

Condition Code

Code	Condition	Min SWCI	Max SWCI		Rehab Priority
0	No SW / Ramp	0	0	No SW / Ramp	0
1	Very Poor	0	20	Very Poor	1
2	Poor	20	40	Poor	2
3	Marginal	40	60	Marginal	3
4	Fair	60	70	Fair	4
5	Good	70	80	Good	5
6	Very Good	80	90	Very Good	6
7	Excellent	90	100	Excellent	7

- **Sidewalk Condition Distress Identification**

The SWCI calculation being utilized to assess the conditions is modeled after the PCI (Pavement Condition Index) calculation. A summary of these defects and how the severity of each is measured can be found on the chart below. It's important to note that sidewalk obstructions, such as utility poles, signposts, and excessive foliage are not included in the SWCI score.

Condition Distresses

Code	Distress	Low	Moderate	Severe
1	Cracking	Cracks < 0.5"	0.5" – 1.0" cracks	> 1.0" wide cracks
2	Faulting	Noticeable to < 1/2" Displacement	1/2" to < 1" Displacement	> 1"Displacement
3	Texture / Scaling	Just starting to lose surface materials or evenness, still acceptable to wheelchair	Noticeable loss of evenness or materials, < 0.5" texture	Considerable loss of surface and uneven, > 0.5" texture
4	Sags / Heaves	No ponding, distortion makes traversing awkward	Sag holds water, distortion makes traversing difficult	Sag holds water, distortion makes traversing very difficult
5	Longitudinal Slope	5% - 8.33%	8.33% - 12.5%	> 12.5%

6	Tilt	2% - 4%	4% - 8%	> 8%
7	Shattered / Crack	Slabs are broken up, no settlements, no missing pieces, no settlement. ACP is cracked / blocked	Slabs / pavement are broken up, settlements present, no missing pieces	Slabs are broken up, Crack settlements noticeable, pieces missing. Pavers settled and separated and distorted
8	Joint Damage Separation	Spalling of joints < 25% of joint length. ACP edge starting to deteriorate. Pavers starting to open slightly	Spalling of joints 25% - 50% of joint length. ACP edge is noticeable ragged. Pavers opened to be noticeable	Spalling of joints > 50% of joint length. ACP edge is deteriorated into sidewalk. Pavers opened and needed to be reset.
9	Weeds	Weeds are present, not predominant, not affecting travel	Weeds are present, predominant, starting to affect travel	Sidewalk is overgrown, weeds are affecting travel
10	Patching	Dissimilar patch is present in good condition, not affecting	Similar patch is present in poor to fair condition affecting performance of walk. Needs leveling.	Similar patch is present in very poor condition affecting performance of walk. Needs replacement.

Extents

a. Distress extents are noted by their approximate length of sidewalk in percentage rounded off to the nearest 10%
b. Extents less than 10% are recorded as a slab count
c. Faulting is noted as a count using the highest severity of fault

- **Sidewalk Condition Images**

Below are examples of the City's sidewalks that fall within the aforementioned sidewalk conditions.

SIDEWALK CONDITION- EXCELLENT

Sidewalks that are free of obstacles such as utility poles, signs, overgrown vegetation, or construction debris and have a clear width of at least 4 feet (48 inches), with passing spaces every 200 feet if less than 5 feet wide.

Location

5th Street NW from Williams Street NW to Myrtle Street NW

Description

The sidewalk presented is in excellent condition, with its overall surface intact and accessible without any distress or cracking.

SIDEWALK CONDITION- VERY GOOD

Sidewalks are at least 4 feet wide (48 inches) throughout. May occasionally narrow due to minor obstructions, but passing spaces are provided every 200 feet where needed.

Location

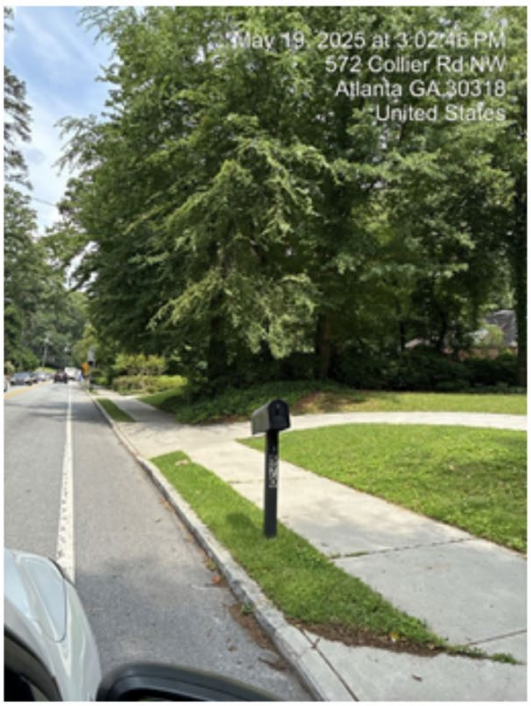
Campbellton Road from Childress Drive SW and Maxwell Drive SW; Honeysuckle Lane to Timothy Drive

Description

The overall sidewalks, both eastbound and westbound, are in very good condition, with the vast majority of the surface being functional and accessible.

SIDEWALK CONDITION- GOOD

Generally, such a sidewalk exhibits a continuous, unobstructed path that meets the required clear width, allowing for safe pedestrian passage and wheelchair maneuverability. The walking surface is firm, stable, and largely free of tripping hazards, with only minor surface irregularities.



Location

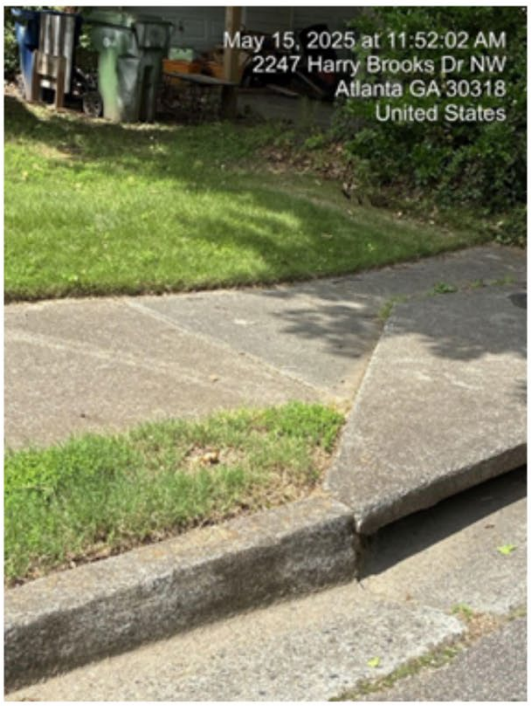
Collier Road from Cottage Lane to Evergreen Lane

Description

This segment has very few distresses, and is classified as being in good condition. It also displays low severity of faulting. This segment would also be a low priority rehab.

SIDEWALK CONDITION- FAIR

Sidewalks that are partially compliant and generally usable but includes noticeable barriers or deficiencies that could impact accessibility for some users, particularly individuals with mobility, visual, or sensory impairments.



Location

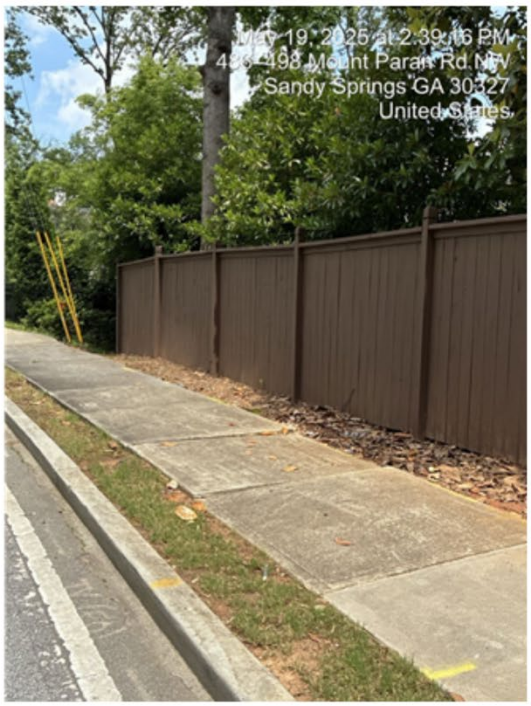
Harry Brooks Drive from
LaDawn Lane to Betty Ann Court

Description

This sidewalk segment is in overall fair condition, with various deficiencies observed. There are cracks throughout the segment. The presence of protruding infrastructure approximately 4 inches above the surface, is an accessibility issue.

SIDEWALK CONDITION- MARGINAL

Sidewalks with surfaces that are unstable, deteriorating, or crumbling, with multiple vertical level changes over ½ inch. May include exposed aggregate, gaps, or broken concrete. Conditions pose concerns to those who use wheelchairs and those with mobility or visual impairments.



Location

Mount Paran Road NW from Montwicke Chase NW to Millbrook Drive

Description

This sidewalk segment is in marginal condition, with the majority of the pavement free of significant defects. There are isolated sections of the sidewalk slab with faulting present.

SIDEWALK CONDITION- **POOR**

Sidewalks characterized by severe, widespread noncompliance that creates major barriers to mobility, safety, and independent use, especially for individuals with disabilities. Sidewalks can be impassable, or functionally unusable for many pedestrians.

Location

Mathieson Drive from
Mathieson Place to Alberta Drive

Description

This sidewalk segment is in generally poor condition, with the majority of the surface remaining serviceable. However, there are a few areas with major cracking that will require localized repair to prevent further degradation.

SIDEWALK CONDITION- VERY POOR

Sidewalks are characterized by extensive cracking, spalling, collapsed slabs, or erosion. Numerous vertical displacements over 1 inch and surfaces may be uneven, broken, or unstable, displaying elements such as loose gravel or missing concrete sections.

Location

Hollywood Road from Mildred Place to Hollywood Drive

Description

This sidewalk segment represents very poor condition. There are significant levels of cracking and uneven surfaces. Portions of the sidewalk are missing and overgrown with vegetation. Deeper faulting of the sidewalk is possible at this location.

- **Sidewalk Obstructions**

Obstructions were assessed independently from the Sidewalk Condition Index (SWCI) and are anticipated to be prioritized more highly for remediation due to two key considerations. First, from an ADA compliance perspective, the presence of a single obstruction on a segment otherwise rated as “Excellent” under the SWCI renders that entire segment noncompliant with ADA regulations. Second, obstructions are often among the most cost-effective accessibility barriers to address. Many common issues, such as overgrown vegetation, improperly placed refuse or recycling containers, can typically be resolved through routine maintenance or low-cost adjustments. Below are two (2) examples of sidewalk obstructions.

Along Oakview Road, there is the presence of foliage that is obstructing the sidewalk.

This utility pole and mailbox along Bolton Road are obstructing accessible travel for this sidewalk segment.

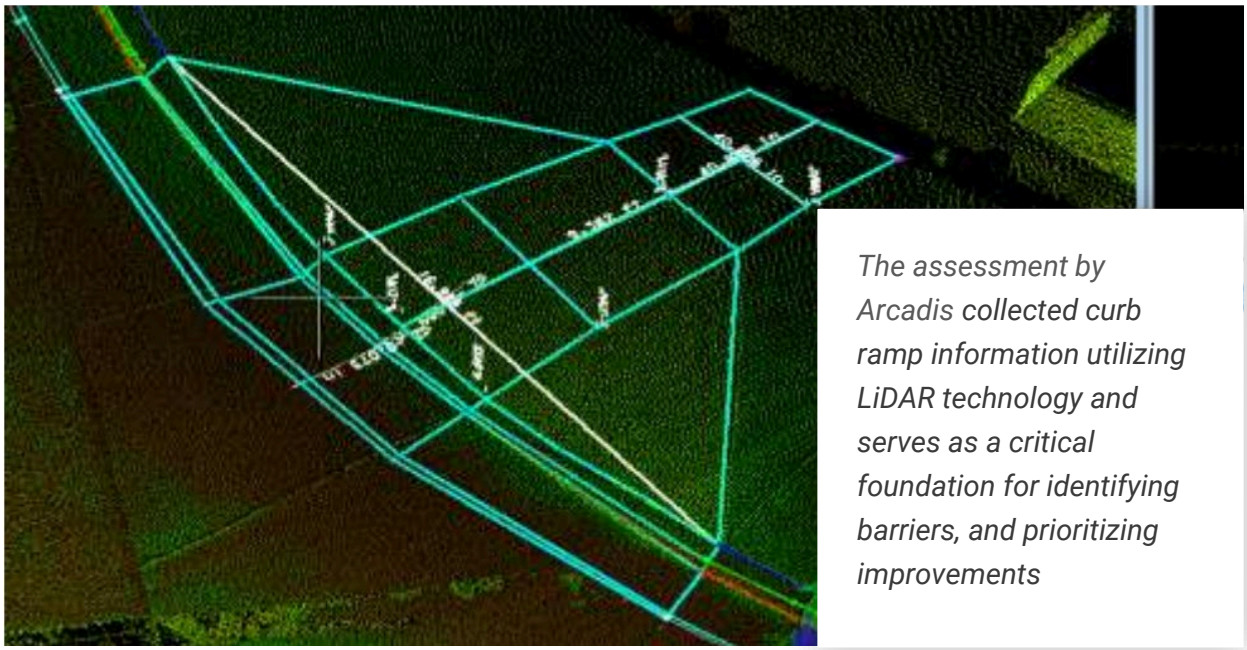
It should be noted that the City is not responsible for obstructions installed by other public entities or utilities with exclusive jurisdiction or substantial control over the relevant portions of the PPROW. Pursuant to the *Lawson* Consent Decree, the City acknowledges an obligation to maintain a policy to mandate that utility companies and other non-City entities do not install barriers in the PPROW. In instances in which these entities install barriers in the PPROW, the City will take reasonable measures to enforce its policy when it receives notice of such barriers. Such reasonable measures shall include, but not be limited to, requesting that these entities remove or relocate said barriers and pay the cost of creating alternative routes.

- **Ramp Assessment**

A comprehensive ADA curb ramp assessment across the City's public right-of-way was conducted on every ramp and was assigned 24 attributes, ranging from ramp/landing/flare slopes to an assessment of the visual impairment facilities. Additionally, other data collected consisted of 12 defects on every ramp and rating them by extent and severity (i.e. faulting, joint damage, shatter slabs, weeds, cracking, etc.).

The assessment included detailed field inspections of existing curb ramps to determine their compliance with the 2010 ADA Standards for Accessible Design and PROWAG. Data collected included measurements and conditions related to:

- Ramp slope and cross-slope
- Landing dimensions and presence of detectable warning surfaces
- Transitions between ramp and gutter/pavement
- Alignment with marked crosswalks
- Overall condition and maintainability



The assessment by Arcadis collected curb ramp information utilizing LiDAR technology and serves as a critical foundation for identifying barriers, and prioritizing improvements

Appendix C

Ramp Summary

Code	Ramp Count	Description
1	56	Shallow slope and cross-slope, flat landing area present with adequate size, slope and flares. Compliant with current standard
2	7,071	Shallow slope and cross-slope, undersized or steep landing area with flares. Compliant with an older standard
3	4,075	Steeper slope and cross-slope, landing area not present or undersized or sloped with flares. Compliant with a much older standard
4	2,510	Not compliant and functions poorly, replacement required
5	4,237	Ramp is not present but one is required
6	265	Rolled face curb with sidewalk lead- curb slope too steep to be compliant
Totals	18,214	
Physical Ramps	13,712	

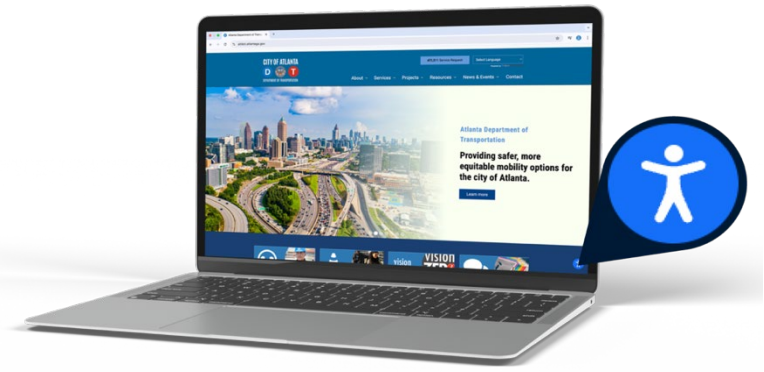
6. COMMUNICATIONS

6.1 Website and Digital Information

An internal assessment of the public-facing ATLDOT website to evaluate compliance with digital accessibility standards has taken place, specifically the WCAG. These guidelines serve as the industry benchmark for ensuring that websites are accessible to people with a wide range of disabilities, including visual, auditory, cognitive, and motor impairments.

As a result, the City contracted with a web accessibility vendor to review the website. The initial website audit took place in September 2024, and since then ATLDOT conducts monthly automated accessibility audits of its website using industry-standard evaluation tools to consistently evaluate the website.

These audits identify potential WCAG noncompliance issues, such as missing form labels, insufficient contrast, or improperly tagged elements that can then be promptly addressed by the web team. This recurring process helps ATLDOT maintain a proactive posture toward digital inclusion and continuous improvement. Based on the results of evaluation, the following has been done to support these efforts:



- Implementing accessibility-friendly web design features (e.g., proper heading structure, alt text for images, sufficient color contrast)
- Reviewing and updating web content to align with WCAG 2.1 Level AA standards
- Coordinating with internal staff and vendors to correct barriers to navigation and improve screen reader compatibility
- Streamlining content layout to enhance usability for individuals using assistive technology

While the website is functionally accessible, ATLDOT acknowledges that some users may still experience difficulty interacting with certain elements depending on their individual needs or devices. Ongoing improvements, post-evaluation, are being made as part of a broader commitment to ensuring that all users, regardless of ability, can find, understand, and interact with ATLDOT content.

6.2 Effective communication

The ADA requires state and local governments to communicate effectively with people who have communication disabilities. The goal is to ensure that communication with people with these disabilities is equally effective as communication with people without disabilities.

The purpose of effective communication rules is to ensure that the person with a vision, hearing, or speech disability can communicate with, receive information from, and convey information to state and local governments. These governments must provide auxiliary aids and services when needed to communicate effectively with people who have communication disabilities.

ATLDOT initiated a focused review of our effective communication policies and practices to ensure that all individuals, including those with disabilities, can receive, understand, and engage with the ATLDOT's information and services.

As part of this effort, an Effective Communication Checklist was developed to assess baseline performance across key areas. This checklist is designed to identify strengths and gaps in the ATLDOT's ability to provide accessible communication, particularly for individuals who are blind or have low vision, are deaf or hard of hearing, have speech disabilities, or have cognitive limitations.

The checklist review covered critical aspects such as:

- Availability and use of auxiliary aids and services (e.g., sign language interpreters, captioning, Braille or large print materials)
- Accessibility of public notices, agendas, and outreach materials
- Readability and clarity of public-facing documents
- Internal staff protocols for responding to accommodation requests
- Staff awareness and training related to ADA communication obligations

This self-assessment has helped ATLDOT establish a baseline for improvement and serves as the foundation for a more comprehensive and sustainable approach to effective communication. Findings from the checklist are being used to guide policy development, staff training efforts, and improvements in public engagement materials.

7. CONCLUSION

The ATLDOT's ADA Self-Evaluation marks a significant milestone in the City's commitment to creating an equitable and accessible transportation system for all. This comprehensive self-assessment, mandated by federal law and the *Lawson* Consent Decree, has thoroughly examined ATLDOT's programs, services, activities, policies, and infrastructure.

The evaluation's findings highlight both areas of compliance and critical deficiencies, particularly concerning the condition of sidewalks and the pervasive issue of obstructions within the public right-of-way. With an SWCI of 54, the City's sidewalks are largely categorized as "marginal," necessitating substantial investment in preventative maintenance and targeted rehabilitation. Furthermore, the detailed inventory of curb ramps and the independent assessment of sidewalk obstructions underscore the need for prioritized remediation efforts, as even minor obstructions can render entire segments non-compliant with ADA regulations.

Beyond physical infrastructure, the Self-Evaluation details ATLDOT's ongoing efforts to enhance digital accessibility, effective communication strategies, and staff training. The continuous internal audits of the ATLDOT website for WCAG compliance, the development of an Effective Communication Checklist, and the implementation of regular ADA training for staff are crucial steps towards fostering a more inclusive environment. The established grievance procedure further reinforces ATLDOT's commitment to addressing and resolving accessibility concerns promptly and effectively.

Ultimately, the Self-Evaluation serves as a vital roadmap for ATLDOT's upcoming ADA Transition Plan. The identified deficiencies and areas for improvement will directly inform the prioritization of remediation efforts, the allocation of resources, and the establishment of the Department's ADA Transition Plan. By transparently acknowledging existing barriers and outlining a clear path forward, ATLDOT is demonstrating its unwavering dedication to building a transportation network that is truly inclusive and accessible to all residents and visitors of Atlanta.

APPENDIX

Weblinks-

https://www.atlantaga.gov/home/showdocument?id=64280&t=638726395258818246, Standard Details on ATLDOT website

https://library.municode.com/ga/atlanta/codes/code_of_ordinances?nodeId=COORATGEVOII_CH138STSIOTPUPL_ARTIINGE_S138-14MASIAR, Maintenance of Sidewalks 138-14

https://library.municode.com/ga/atlanta/codes/code_of_ordinances?nodeId=COORATGEVOII_CH138STSIOTPUPL_ARTIINGE_S138-15OBSIDISAGO, Sec. 138-15. - Obstructing sidewalks by display or sale of goods

https://library.municode.com/ga/atlanta/codes/code_of_ordinances?nodeId=COORATGEVOII_CH138STSIOTPUPL_ARTIINGE_S138-17DEOBSI, Sec. 138-17. - Design objectives for sidewalks

Documents-

APPENDIX A Training Curriculum

APPENDIX B Sidewalk Condition Inventory table

APPENDIX C Ramp assessment LiDAR image, ramp summary

GLOSSARY

Accessibility – The design of programs, services, environments, or products so that they are usable by people with disabilities.

ADA (Americans with Disabilities Act) – A federal civil rights law enacted in 1990 that prohibits discrimination against individuals with disabilities in all areas of public life.

ADA Coordinator – The designated official responsible for overseeing ADA compliance and coordinating efforts to ensure equal access within a public entity.

Auxiliary Aids and Services – Devices or services that ensure effective communication for individuals with disabilities (e.g., interpreters, captioning, Braille materials).

Disability – Defined by the ADA as a physical or mental impairment that substantially limits one or more major life activities.

Effective Communication – Communication with people with disabilities that is as effective as communication with others, using appropriate aids and formats.

Grievance Procedure – A process established to handle complaints related to ADA violations, required for entities with 50 or more employees.

Pedestrian Public Right-of-Way (PPROW) – Public land typically used for transportation purposes, such as sidewalks, streets, curb ramps, and crossings.

PROWAG (Public Right-of-Way Accessibility Guidelines) – Proposed guidelines developed by the U.S. Access Board to provide technical standards for accessible design in the public right-of-way.

Self-Evaluation – A review by a public entity of its current policies, practices, and procedures to determine whether they meet the requirements of Title II of the ADA.

Transition Plan – A document required by the ADA that identifies physical barriers in public facilities and outlines a schedule and method for their removal to achieve compliance.

APPENDIX A

Sample Training Curriculum (under review)

Title: ADA Title II & PROWAG: Ensuring Accessibility in the Pedestrian Public Rights-of-Way
Audience: Plan Reviewers, Field Inspectors, and Relevant City Staff
Duration: 2.0 Hours (Annual Mandatory Training)
Delivery Format: Instructor-led or e-learning module
Developed by: ATLDOT ADA Coordinator in consultation with the ADA Advisory Committee
Reviewed/Approved by: ATLDOT Commissioner

Module 1: Introduction to the ADA and the Consent Decree

- Objective: Familiarize participants with the Americans with Disabilities Act (ADA) and the specific provisions of the Lawson Consent Decree related to Pedestrian Public Right of Way (PPROW) improvements.
    - Overview of the ADA Title II and how it relates to municipal government responsibilities.
    - Introduction to the Lawson ADA Consent Decree: History, objectives, and the role of the Atlanta Department of Transportation (ATLDOT).
    - The Consent Decree's requirements for accessibility in public spaces.
    - Overview of the obligations of city employees, plan reviewers, and inspectors.

Module 2: ADA Accessibility Standards and Pedestrian Public Right of Way (PPROW)

- Objective: Provide detailed instruction on ADA Accessibility Standards and how they apply to sidewalks, curb ramps, crosswalks, and other pedestrian elements within the PROW.

  - Explanation of the Public Rights-of-Way Accessibility Guidelines (PROWAG).
  - Key elements of compliance:
    - Accessible routes
    - Pedestrian crossings
    - Curb ramps and detectable warnings
    - Clear width, slope, and surface conditions
  - Real-life examples of compliant and non-compliant elements in the PROW.

Module 3: Plan Review for ADA Compliance

- Objective: Train participants to assess project plans for ADA compliance before construction begins.
  - Review of submission requirements for plans involving PROW.
  - Key considerations during the plan review:
    - Ensuring sidewalks and paths meet width and slope requirements.
    - Evaluating curb ramp designs for safety and accessibility.
    - Checking for accessible pedestrian signals (APS) at crosswalks.
  - Interactive case studies on reviewing and correcting non-compliant plans.

Module 4: Field Inspections and Monitoring

- Objective: Teach inspectors how to perform ADA-compliant field inspections and document findings for compliance or non-compliance.
  - Step-by-step guide for conducting field inspections of public rights-of-way.
  - How to identify barriers and ensure that the construction matches the approved plans.
  - Techniques for measuring slope, cross-slope, and surface conditions.
  - Best practices for documenting non-compliance, filing reports, and initiating corrective action.

Module 5: Communication and Reporting Procedures

- Objective: Ensure participants are equipped with tools to effectively communicate findings and maintain transparent reporting processes.
    - Required documentation for ADA compliance and inspection reports.
    - Communication strategies for interacting with contractors, engineers, and the public.
    - Processes for submitting reports and escalating non-compliance issues.
    - Ensuring effective communication with people with disabilities, including those with communication-affecting disabilities, as outlined in the Consent Decree.

Module 6: Practical Application and Workshops

- Objective: Provide hands-on training through workshops and practical exercises.
    - Participants will engage in real-world case studies and mock field inspections.
    - Simulated scenarios for both plan review and site inspection to reinforce concepts learned.
    - Group discussions on best practices and addressing challenging scenarios.

Module 7: Legal Implications and Consequences of Non-Compliance

- Objective: Understand the legal consequences of failing to comply with ADA standards and the Lawson Consent Decree.
    - Overview of the potential legal ramifications for non-compliance with the Consent Decree.
    - The role of the ADA Monitor in overseeing compliance and enforcing standards.
    - How to avoid legal challenges through proactive planning and diligent inspections.

Module 8: Ongoing Education and Support

- Objective: Encourage continued learning and adaptation to ensure long-term compliance.
    - Resources for continuing education on ADA and accessibility standards.

- Ongoing support channels, including consultation with the ADA Coordinator and legal teams.
- Building an internal culture of accessibility within the ATLDOT and related departments.

APPENDIX B

A collection of sidewalk segments and their survey conditions can be found here.

sidewalk condition segments.pdf

APPENDIX C

A full inventory of ramp assets can be found here.

ramp segments inventory.pdf