DRAFT

ADA TRANSITION PLAN UPDATE

Montana Department of Transportation



October 2026

Providing access for all transportation users







MONTANA
Department of Transportation

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The following people provided guidance and support throughout the course of the plan update.

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The advisory committee (AC) provided plan oversight and reviewed deliverables. The AC included representatives from the Montana Department of Transportation (MDT), Federal Highway Administration (FHWA), and representatives from the disability community.

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ACRONYMS

AADT	Annual Average Daily Traffic
AC	Advisory Committee
ADA	Americans with Disabilities Act
ADAAG	ADA Accessibility Guidelines
APS	Accessible Pedestrian Signals
CFR	Code of Federal Regulations
CHSP	Comprehensive Highway Safety Plan
CMAQ	Congestion Mitigation and Air Quality
DOJ	United States Department of Justice
DWD	Detectable Warning Devices
EA	Emphasis Area
EPM	Construction Engineering Project Managers
FHWA	Federal Highway Administration
LAP	Language Access Plan
LEP	Limited English Proficiency
MCS	Motor Carrier Services
MDT	Montana Department of Transportation
MOU	Memorandum of Understanding
MPO	Metropolitan Planning Organization
MUTCD	Manual on Uniform Traffic Control Devices
PHB	Pedestrian Hybrid Beacon
PMT	Project Management Team
PROWAG	Public Rights-of-Way Accessibility Guidelines
Px3	MDT's Performance Programming Process
RDM	MDT Road Design Manual
SME	Subject Matter Experts
STIP	Statewide Transportation Improvement Program
TA	Transportation Alternatives
VRU SA	Vulnerable Road User Safety Assessment

ADA TRANSITION PLAN UPDATE
Montana Department of Transportation

A MESSAGE FROM THE DIRECTOR

The Montana Department of Transportation (MDT) is committed to planning, building, operating, and maintaining a safe and resilient transportation system that moves Montana forward. Every day, our employees work to ensure that people arrive at their destinations safely, and accessibility is an essential part of that commitment.

The *Americans with Disabilities Act (ADA) Transition Plan* reflects MDT's ongoing dedication to providing a transportation system that serves all Montanans. We recognize that accessible transportation strengthens communities by ensuring opportunities to travel safely and independently. This commitment is closely aligned with MDT's broader strategic priorities of enhancing safety, improving customer experience, increasing organizational effectiveness, and delivering transportation solutions that meet Montana's evolving needs. Creating an inclusive transportation network requires collaboration and a continued focus on serving people first.

Since our previous *ADA Transition Plan*, MDT has continued to make meaningful progress in identifying and removing barriers throughout Montana's transportation system. Through stand-alone ADA improvement projects and accessibility enhancements incorporated into highway reconstruction projects, we have expanded and improved accessible pedestrian infrastructure and strengthened the processes we use to prioritize future improvements.

The 2026 *ADA Transition Plan Update* builds on that progress. It documents the department's continued efforts to improve accessibility data and incorporate it into all MDT programs and activities. The plan reflects our commitment to delivering transportation improvements that are thoughtful, proactive, and responsive to the needs of the people we serve.

Successful implementation of this plan depends on strong partnerships with local governments, tribal nations, advocacy organizations, community members, and other stakeholders across Montana. Together, we can continue removing barriers, improving mobility, and creating a transportation system that is safe, resilient, and accessible for current and future generations.

Thank you for taking the time to learn about MDT's commitment to accessibility.

Sincerely,

Larry Flynn
Director


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Smith's

Chapter 1
INTRODUCTION

The Montana Department of Transportation (MDT) *Americans with Disabilities Act (ADA) Transition Plan* directs the department's efforts to provide an accessible transportation system within the State of Montana. The purpose of the plan is to provide guidance for removal of barriers to enable access to MDT's programs, facilities, and services for transportation users of all abilities. The plan provides an overview of MDT's external ADA program, outlines MDT's mission and ADA policy, and identifies methods to assist MDT in complying with ADA regulations. The plan is intended to be a living document to reflect the current MDT ADA program and compliance status. **The MDT Director is responsible for implementing the plan**.



1.1 MDT MISSION AND ADA POLICY STATEMENT

MDT's mission is to plan, build, operate, and maintain a safe and resilient transportation system to move Montana forward. MDT's mission and values drive the department to provide Montana with transportation systems that are carefully designed, built, and maintained to serve communities and strengthen local economies. With a focus on organizational excellence, service clarity, and accountability, MDT program areas set the gold standard for a highly effective, innovative, and people-centric department of transportation.



In fulfilling its mission, MDT recognizes the importance of providing access to all transportation system users, including those with impairments affecting mobility. Accessible building facilities and right-of-way features provide critical access to employment, health care, education, and government services. Access for people with disabilities facilitates independence and self-sufficiency, quality of life, participation in the work force, and meaningful social and economic contributions to society. The MDT *ADA Transition Plan* is an important step in helping MDT identify barriers and provide opportunities for individuals with disabilities to use MDT programs, right-of-way features, and building facilities based on their specific needs.

In accordance with 28 CFR 35.130, it is MDT policy that no qualified person with a disability shall, solely by reason of disability, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity that receives federal financial assistance administered by the United States Department of Transportation (USDOT).

1.2 REGULATORY FRAMEWORK

Title VI of the Civil Rights Act of 1964

Title VI, 42 USC § 2000d et seq., was enacted as part of the landmark Civil Rights Act of 1964. It prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance.

Section 504 of the Rehabilitation Act of 1973

Section 504 of the Rehabilitation Act of 1973 prohibits discrimination on the basis of disability by any program or activity receiving federal financial assistance. Discrimination may consist of exclusion from participation in or denial of the benefits of programs and activities operated by a department, agency, or other instrumentality of state or local government. Section 504 applies to MDT, as well as all sub-recipients of federal funds.

Section 508 of the Rehabilitation Act of 1973

Health and Human Services Section 508 and Accessibility Standards Section 508 of the Rehabilitation Act, as amended by the Workforce Investment Act of 1998 (P.L. 105-220), requires that when MDT develops, procures, maintains, or uses information and communication technology (ICT), it shall be accessible to people with disabilities. MDT employees and members of the public who have disabilities must have access to, and use of, information and data that is comparable to people without disabilities. All products, platforms, and services delivered by MDT that are ICT, or contain ICT, must conform to the Revised 508 Standards located at 36 CFR 1194.1

Title II of the Americans with Disabilities Act of 1990

The Americans with Disabilities Act of 1990 expands on the foundation laid by Section 504 by prohibiting discrimination on the basis of disability by public entities regardless of whether they receive federal financial assistance. The Act is divided into five titles describing requirements relating to (I) employment, (II) state and local government services, (III) public accommodations, (IV) telecommunications, and (V) miscellaneous provisions. Title II of the Act applies specifically to state and local government services and the programs and activities they administer, including features built before and after 1990. Titles I, III, IV, and V are not addressed further in the MDT *ADA Transition Plan*.

ADA Implementing Regulations

The Code of Federal Regulations (CFR) outlines regulations implementing Title II of the ADA, which apply to MDT as a department of Montana state government. **Appendix A** summarizes relevant MDT responsibilities under Title II of the ADA as implemented by the United States Department of Justice (USDOJ).

Public entities employing 50 or more persons must develop a document called a transition plan outlining the steps necessary to complete any structural changes (i.e., changes to physical assets) to achieve program compliance.

At a minimum, the plan must meet the requirements stated in 28 CFR 35.150(d)(3) as follows.

- ✔ Identify physical obstacles in the public entity's facilities that limit the accessibility of its programs or activities to individuals with disabilities.
- ✔ Describe in detail the methods that will be used to make the facilities accessible.
- ✔ Specify the schedule for taking the steps necessary to achieve compliance with this section and, if the time period of the transition plan is longer than one year, identify steps that will be taken during each year of the transition period.
- ✔ Indicate the official responsible for implementation of the plan.

As part of the transition plan, public entities responsible for streets, roads, or walkways must include a schedule for providing curb ramps or other sloped areas where pedestrians walk across curbs, giving priority to walkways serving state and local government offices and facilities, transportation, places of public accommodation, and employers, followed by walkways serving other areas (28 CFR 35.150(d)(2)).

The MDT *ADA Transition Plan* addresses requirements relating to physical assets, including facilities within MDT right-of-way. For the purposes of this plan, facilities are defined to include district and headquarters office buildings, rest areas, airports, maintenance buildings, and motor carrier services (MCS) scale sites. Right-of-way features include elements such as curb ramps, sidewalks, crosswalks, median crossings, and pedestrian activated signal systems. In addition to these requirements, the MDT *ADA Transition Plan* addresses other elements outlined in Title II of the ADA related to administration, communications, and maintenance.



Public entities must provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the development of the transition plan by submitting comments. A copy of the transition plan must be made available for public inspection (28 CFR 35.150(d)(1)). Public participation and document availability are discussed in more detail in **Chapter 2** and **Appendix B**.

Implementing regulations also address accessibility of web information and services of state and local governments, including text, images, videos, and documents posted online. Web Content Accessibility Guidelines (WCAG) have been adopted as the technical standard for web content and mobile app accessibility under Title II of the ADA. Conformance with these guidelines is intended to ensure people with disabilities have access to state and local government services, programs, and activities available on websites and mobile apps.

In addition to regulations implemented by the USDOJ, the USDOT prohibits discrimination against qualified persons with disabilities, and requires federal-aid recipients to make reasonable accommodations in policies, practices, or procedures when necessary to avoid discrimination on the basis of disability unless the accommodations would fundamentally alter the nature of the service, program, or activity or result in an undue financial and administrative burden (49 CFR 27.7).

MDT must ensure all of its programs, services, and activities are accessible to and usable by individuals with disabilities. MDT's external ADA program ensures that people with disabilities have opportunities to use the public right-of-way system. This program is responsible for implementing MDT's *ADA Transition Plan*, which guides MDT's efforts to provide an accessible transportation system in Montana.

In 2023, the Architectural and Transportation Barriers Compliance Board (Access Board) issued a final rule outlining minimum guidelines for the accessibility of pedestrian facilities in the public right-of-way (PROWAG) to ensure that facilities used by pedestrians, such as sidewalks and crosswalks, constructed or altered in the public right-of-way by federal, state, and local governments are readily accessible to and usable by pedestrians with disabilities. Subsequently, the USDOT amended its ADA regulations to adopt PROWAG as USDOT's regulatory standards for new construction and alterations of transit stops in the public right-of-way, effective January 17, 2025.

1.3 RELATED PLANS, DOCUMENTS, AND INVENTORIES

MDT has developed a range of statewide plans, operations manuals, design criteria, asset inventories, and communications guidelines that complement and influence the *ADA Transition Plan*. The following documents provide information pertaining to the planning, design, implementation, and maintenance of ADA-accessible features and guidelines for accommodating all individuals in the public involvement process.

Montana Traffic Engineering Manual (2009)

The *Montana Traffic Engineering Manual* provides uniform traffic engineering practices for MDT and consultant personnel when preparing plans for MDT projects. The manual provides limited guidance on ADA accessible traffic control and defers to the *Manual on Uniform Traffic Control Devices* (MUTCD), which provides additional accessibility information. The manual provides guidance on standard signing including requirements for readability and standard placement to ensure signs do not obstruct the path of pedestrians. The manual also lists advantages and disadvantages of pedestrian signals and notes that, when used, pedestrian push buttons should be placed so they are convenient to use, reachable by individuals with disabilities, and not placed in the direct path for those with a vision disability as per ADA requirements. Chapter 31 of the manual describes special design elements including requirements for accessible on-street and off-street parking accommodations.

Maintenance Operations and Procedures Manual (2009)

The MDT *Maintenance Operations and Procedures Manual* outlines guidance for providing consistency in maintenance duties and reporting activities. The manual includes standard methods and best practices for both preventative and reactive maintenance activities. The manual provides guidance for maintenance of MDT buildings, sites, and rest areas including snow removal, sign maintenance, and other safety considerations, although specific ADA accommodations are not detailed. The chapter on winter maintenance provides limited information about pedestrian facilities but recommends that when plowing where there is a curb, gutter and sidewalk, plowing to the right should be performed carefully so that snow is not stacked on the sidewalk. Depending on anticipated accumulation, it is also recommended that snow be plowed to the center of the street for later removal.

Design Memos (2010 - 2026)

The following design memos issued by MDT provide clarification or additional guidance on roadway design elements related to ADA accommodations and accessibility.

Public Rights-of-Way Accessibility Guidelines (November 19, 2010): MDT has adopted the Access Board's PROWAG as the official accessibility manual, replacing the *ADA Accessibility Guidelines* (ADAAG). [Revised February 2, 2023 to update contact information]

EPM/Design Meeting Minutes (February 10, 2012): Summary of topics discussed at a Construction Engineering Project Managers (EPM) meeting including:

- amount of design detail needed in plans for sidewalks and ADA ramps;
- properly addressing ADA issues during the Preliminary Field Review;
- training needed for design and construction of ADA curb ramps and associated items including work zone ADA requirements;
- sidewalk transition and removal of existing sidewalk panels; and
- other issues related to design.

Detectable Warning Devices (DWD) (June 16, 2014): Cast iron detectable warning devices will be used for all installations. Type 2 installations require the removal of existing concrete and placement of new concrete to set the device. [Superseded]

Detectable Warning Devices (August 3, 2016): Type 2 DWD will no longer be installed on MDT projects and Type 1 DWD should be included on both new construction and retrofit existing curb ramps.

MDT Geometric Design Criteria and Design Exceptions (March 25, 2021): This memo rescinds and replaces the MDT Geometric Design Standards and establishes the authority and procedure to establish MDT baseline design criteria to better support MDT's performance-based practical design philosophy and meet the requirements of 23 CFR.

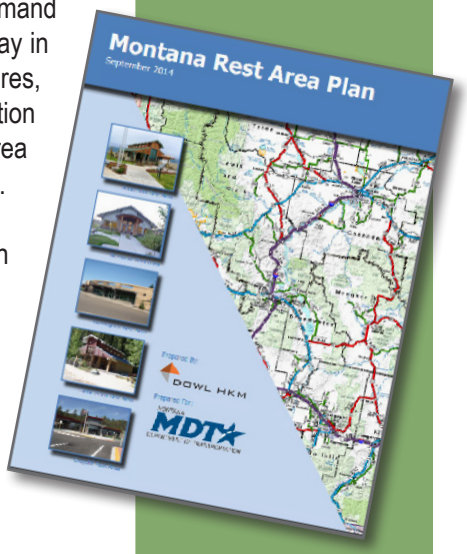
Procedure for Sidewalk & Approach Construction Agreement (July 20, 2023): When the construction/reconstruction of curb ramps, sidewalks, and/or approaches is part of an MDT project that does not have a right-of-way phase, district right-of-way staff will identify the impacted landowners/addressees where the sidewalk facility is to be constructed and will be responsible to initiate discussions and notification of the upcoming project with the landowners. These improvements must be located within the existing footprint of the existing ramps, sidewalks, and/or approaches. If the improvements are outside the existing footprint, district right-of-way design staff will need to request a right-of-way phase to be authorized for funding.

11th Edition of the Manual on Uniform Traffic Control Devices (October 22, 2024): Effective January 1, 2026, MDT adopted the 11th Edition of the MUTCD in its entirety. All traffic control devices installed after this date must comply with the 11th Edition, and non-compliant devices will be upgraded as projects are nominated. Of note, the 11th Edition now requires crosswalk markings at all legally established crosswalks at non-intersections, defines minimum crosswalk widths, provides interim approval for rectangular rapid flashing beacons (RRFBs), and includes expanded guidance on bicycle traffic control devices, accessible pedestrian signals (APS), and audible information devices (AID).

Road Design Manual (RDM) 2026 Updates (January 30, 2026): The RDM has been updated to resolve discrepancies that had arisen from various guidance emails and documents distributed since the previous 2016 publication.

Montana Rest Area Plan (2014)

The *Montana Rest Area Plan* represents MDT's comprehensive statewide vision for the MDT Rest Area Program in the context of challenges such as aging infrastructure, high rest area demand and visibility, and limited funding. MDT recognizes the value of rest areas and the role they play in combating drowsy and distracted driving, providing shelter during weather events and road closures, and supporting the tourism and trucking industries. The MDT Statewide Rest Area Prioritization Plan Committee meets regularly to discuss and advance the progress and priority of rest area projects and topics that affect rest area strategy, including the public experience and regulation.



Rehabilitation, reconstruction, and new construction projects at rest areas are identified based on health index scoring, network evaluation results, program tradeoffs and risks, and input from the committee and MDT districts. Additionally, the determination of overall need at rest areas and truck parking areas considers the compliance status of exterior and interior ADA features such as picnic areas, benches, parking stalls, curb ramps, sidewalks, pedestrian ramps, protruding objects, doorways, drinking fountains, sinks, and water closets according to ADA compliance criteria summarized in Appendix B of the plan. The plan defines the following guidelines relating to accessibility.

Guideline 1: Conduct regular site evaluations of state-maintained rest areas to assess adequacy and availability of services.

Guideline 7: Design parking area configurations in accordance with applicable MDT design standards, where practicable, to enhance circulation, access, and safety for vehicles and pedestrians.

- For new rest areas and existing rest areas, parking design will emphasize safety and accessibility for pedestrians and vehicles. Sites will comply with the ADA, including the appropriate number, type, and location of designated parking stalls and other building and site features.

Guideline 9: Use site-specific usage data, where available, and consider site-specific conditions to identify the appropriate number and configuration of restroom stalls.

- For all configurations, interior building features will comply with ADAAG and PROWAG.

Guideline 10: Provide appropriate building and site features to promote patron safety and accessibility.

- ADA components will be installed, including interior and exterior building features. Pedestrian routes will comply with ADAAG and PROWAG and provide access to the rest area building and features throughout the site.
- Signage should comply with the MUTCD, ADAAG, and PROWAG to inform and guide patrons.

Guideline 19: Maintain parking lots and entrance/exit ramps in safe and functional condition.

TranPlanMT (2017)

TranPlanMT is Montana's statewide long-range transportation plan that sets overarching statewide policy goals and priorities for MDT's multimodal transportation system. The plan outlines existing and projected conditions related to transportation assets, users, context, and management and defines a series of goals and strategies to address priority areas. The plan notes the importance of providing pedestrian facilities to increase mobility and accessibility, enhance safety, and to cultivate an environment in which non-motorized transportation modes are recognized as a valuable component of transportation choice for Montana residents and visitors. To meet user needs, the plan recognizes that sidewalks and supporting features such as curb ramps, crosswalks, and pedestrian signals are important physical assets within MDT's multimodal system.

TranPlanMT outlines MDT's prioritization process for making roadway investment decisions according to (1) system preservation and maintenance, (2) mobility and economic vitality, and (3) accessibility and connectivity. Reflecting public and stakeholder feedback and data analysis, TranPlanMT defines the following goal and strategies related to accessibility and connectivity.

Accessibility and Connectivity Goal: Preserve access to the transportation network and connectivity between modes.

Accessibility and Connectivity Strategies:

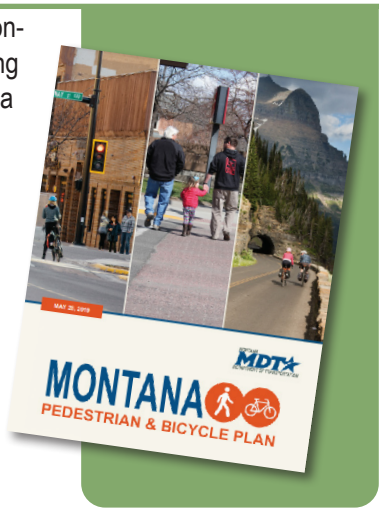
- AC1: Improve pedestrian, public transportation, and other MDT-owned facilities to ensure accessibility to individuals with disabilities.
- AC2: Employ an asset management system to monitor and manage public transportation capital assets.
- AC3: Implement a consistent approach for investment, design, connectivity, and maintenance of pedestrian and bicycle facilities.
- AC4: Identify and consider accessibility and connectivity needs on improvement projects.
- AC5: Coordinate use of public transportation systems through integrated planning with providers.
- AC6: Maximize efficiency of transportation options available to disadvantaged populations.

Guidelines for Nomination and Development of Pavement Projects (2017)

This Joint Agreement between MDT and FHWA provides guidelines for nominating and developing projects in various funding and roadway treatment categories. The agreement supplements MDT geometric design criteria addressing corrective maintenance, pavement preservation, minor and major rehabilitation, and reconstruction and establishes guidelines for federal aid participation, state maintenance, and state construction. In compliance with ADA and PROWAG, the guidelines direct installation and upgrading of curb ramps wherever a prepared surface for pedestrian use is altered by a project, in accordance with the MDT ADA Statement of Technical Infeasibility form. Additionally, the guidelines direct coordination with the MDT External ADA Coordinator and MDT Traffic Operations Units to determine if signal work is appropriate.

Montana Pedestrian & Bicycle Plan (2019)

The 2019 *Montana Pedestrian & Bicycle Plan* is the first statewide effort to address the needs of non-users across the state. The plan is primarily aimed at providing consistency across MDT for considering pedestrian and bicycle modes on state owned and maintained facilities but is also intended as a resource by other agencies working to fulfill the needs of pedestrians and bicyclists in Montana.



The plan recognizes that walking and bicycling are important mobility opportunities for the state's vulnerable populations who are frequently transportation disadvantaged such as seniors, minority, and low-income individuals and families. Accessibility barriers, such as steep curb ramp slopes, vertical sidewalk discontinuities, and lack of pedestrian facilities are often a hindrance to mobility for non-motorists. The plan also points out that design guidance for accessible non-motorized facilities has evolved rapidly in recent years and may not be a natural part of the roadway design process. Flexible design that achieves safe and inclusive roadways may require additional training of design staff, support from local agencies and MDT, and endorsement of outside design guidance from traditional sources.

The plan identifies a guiding vision and series of goals that recognize the need for a balance between transportation choice, connectivity, accessibility, system preservation and maintenance, public health, safety, education, and environmental stewardship. The plan defines the following goal and strategies related to improving mobility and accessibility.

Goal 4: Improve mobility and accessibility for all.

Strategy 4A: Improve accessibility and mobility using current design guidance and modern technology when building, upgrading, and retrofitting pedestrian and bicycle facilities.

Strategy 4B: Provide safe access to schools and areas with significant senior, minority and low-income populations.

Bus Stop Review/Approval & MDT Bus Stops/Parklets/Pedlets (2020)

These documents outline the process for considering requests for new and existing unpermitted bus stops and parklets/pedlets within MDT right-of-way, with stipulations for required agreements and permits. As outlined in the review and approval requirements, new bus stops must meet or exceed current MDT criteria for accessibility as set forth by the USDOJ's ADAAG, Access Board's PROWAG, and MDT's detailed drawings, 608 series. Specifically, requirements include:

- A 5-foot-by-8-foot boarding and alighting area that is firm, stable and slip resistant.
- Must be connected to an accessible route (sidewalk, shared-use path, roadway shoulder in absence of dedicated pedestrian facility).
- Slopes cannot exceed 2% in boarding area.
- Must maintain a minimum 48-inch unobstructed path of travel, exclusive of the width of the curb, and taking signage or other obstacles into account.
- Additionally, bus stops may not be placed on a sidewalk or on a crosswalk.

Seasonal use requests are addressed in the procedure for parklets/pedlets, which are temporary structures located on state-maintained highway right-of-way that serve to extend business access and accommodate pedestrians as appropriate. Day-use of state-maintained highway rights-of-way such as furniture placed on sidewalks and removed each day is considered by MDT on a case-by-case basis.

MDT Baseline Criteria Practitioner's Guide (2021)

This publication provides further procedure and technical guidance for practitioners in accordance with the March 2021 design memo, establishes controlling and non-controlling baseline criteria for design elements, documents baseline criteria, and replaces all design memos establishing, defining, or identifying MDT Geometric Design Standards prior to the 2021 effective date. It also provides guidance for the appropriate use and documentation of context specific criteria and scope specific application for these procedures. Proposed deviations from baseline criteria and context specific criteria should provide consistency with project purpose and need, and include considerations for expected safety performance, expected operational performance, and facility condition.

Except for the Interstate System, selection of baseline design values depends on the functional classification of the highway facility rather than a system designation. Where context specific considerations exist, relative context specific criteria should be used in place of the uniform baseline criteria to better meet the requirements of the specific roadway contexts, and all users. Scope specific considerations can be documented and approved to exempt the project or location from meeting any or all design criteria requirements. Unless exempted or altered by scope specific considerations, deviations from the baseline or approved context specific design criteria require a design exception or a variance.

Montana Vulnerable Road User Safety Assessment (2023)



The *Montana Vulnerable Road User Safety Assessment* (VRU SA) provides a baseline analysis of historic VRU-involved crashes occurring in Montana and presents individual strategies that could be implemented in Montana to improve VRU safety and accessibility. The analysis found that crashes involving pedestrians were more common in urban areas and at intersections where there were no pedestrian facilities available. A few individuals in wheelchairs were struck while operating in the roadway, despite an adjacent sidewalk being available. In these cases, the pedestrian cited poor sidewalk maintenance or lack of traversable curb ramps as reasons for riding in the roadway.

The assessment identified a comprehensive set of strategies to improve VRU safety and reduce VRU fatalities and suspected serious injuries in Montana. Strategies include educational campaigns, investments in infrastructure projects, new technologies, maintenance practices, policies, enforcement, and training to address VRU safety. Although MDT is the lead agency for development of the VRU SA, implementation of VRU safety strategies across the state will require coordination, cooperation, and support from multiple partners. Disability groups can help share information about pedestrian visibility, advocate for construction and maintenance of accessible pedestrian facilities, promote educational campaigns to local individuals engaged in walking and rolling, and help ensure VRUs are fully and equitably considered in transportation investment decisions.

MDT Procedure for Sidewalk and Approach Construction Agreement (2023)



This memo outlines procedures MDT uses when the construction/reconstruction of curb ramps, sidewalks, and/or approaches is part of an MDT project that does not have a right-of-way phase. For improvements located within the existing footprint of the existing ramps, sidewalks, and/or approaches, MDT will identify the impacted landowners/addressees where the sidewalk facility is to be constructed and initiate discussions and notification of the upcoming project with the landowners. Before construction occurs, MDT will distribute the *Sidewalk & Approach Construction Agreement* to all impacted landowners to request signatures consenting to the proposed work.

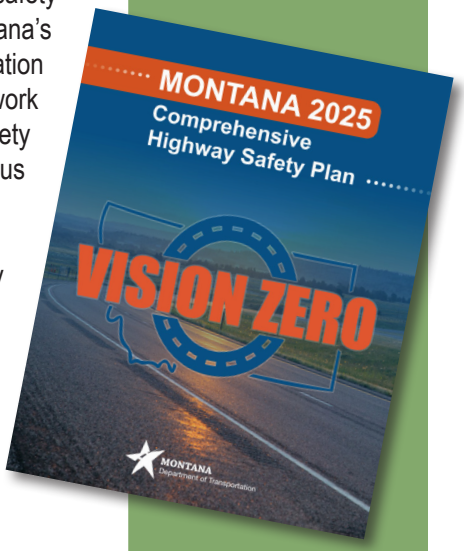
If the improvements are outside the footprint of the existing curbs, sidewalks, and/or approaches, MDT will initiate a right-of-way phase to be authorized for funding, including survey and acquisition activities. MDT Legal will participate in the process if a landowner expresses concerns.

Montana Transit State Management Plan (2024)

The *Montana Transit State Management Plan* emphasizes improving mobility, accessibility, and transportation equity for individuals with disabilities through multiple federal and state transit programs. The federal "Enhanced Mobility of Seniors and Individuals with Disabilities" program (49 USC 5310) specifically supports transportation services, vehicle purchases, and coordinated mobility initiatives that address gaps in transportation access for people with disabilities, particularly where services are unavailable, insufficient, or inappropriate. Additionally, the state's TransADE program leverages the state gas tax revenue account to provide transportation assistance to seniors and individuals with disabilities (MCA 7-14-112). The document also reinforces ADA compliance by requiring accessible vehicles, wheelchair-accessible paratransit services, ADA-compliant facilities, and ongoing maintenance of accessibility features. MDT further promotes coordination among public, nonprofit, tribal, and private transportation providers through local Transportation Advisory Committees and coordinated public transit-human services transportation plans that include participation from individuals with disabilities and advocacy groups. In addition, the plan outlines Title VI and ADA complaint procedures, civil rights oversight, accessibility standards for federally funded facilities and vehicles, and funding priorities designed to expand access to healthcare, employment, education, public services, and recreation for people with disabilities across Montana, particularly in rural communities.

MDT Comprehensive Highway Safety Plan (2025)

The 2025 *Montana Comprehensive Highway Safety Plan* (CHSP) is a comprehensive statewide safety plan that identifies the causes of fatalities and serious injuries across all travel modes on Montana's roadways for all roadway users. Built upon the Vision Zero goal of promoting stakeholder collaboration and normalizing a culture of traffic safety, the 2025 CHSP update provides a collaborative framework for eliminating fatalities and serious injuries through a data-driven process to identify key safety needs and guides strategies and resources with the greatest potential to reduce death and serious injury.



The CHSP uses the best available data to identify critical highway safety problems and safety improvements on all public roads. These data-driven findings were strategically organized into four Emphasis Areas (EAs) that directly correspond to the most significant crash factors. The Safe Roads EA encompasses key elements relative to the built environment and includes VRU infrastructure serving all non-motorized road users, such as pedestrians and individuals using wheelchairs or other personal mobility devices. One of the strategies under this EA is to improve VRU facilities, visibility, and driver awareness. Each EA has established implementation work plans with designated lead agencies responsible for collaboration, coordination, and communication of strategic action items. EA leads monitor and report progress on strategy implementation, ensuring that Montana's safety improvement efforts are focused on proven safety countermeasures with the greatest potential to reduce fatalities and serious injuries.

MDT Language Access Plan (2026)

As a recipient of federal financial assistance, MDT is required to comply with Title VI of the Civil Rights Act of 1964 and related statutes, regulations, and authorities, and to deliver its federally assisted programs, services, and activities in a fair and non-discriminatory manner. This includes taking reasonable steps to provide limited English proficient (LEP) individuals with meaningful access to all MDT Programs. LEP individuals do not speak English as their primary language and have limited ability to speak, read, write or understand English. The purpose of the MDT *Language Access Plan* (LAP) is to ensure MDT communicates effectively with LEP individuals. Meaningful access means providing language assistance that results in accurate, timely, and effective communication at no cost to the LEP individual. For LEP individuals, meaningful assistance denotes access that is not significantly restricted, delayed, or inferior compared to access provided to English proficient individuals. The LAP provides guidance to MDT Programs for identifying LEP individuals, implementing language assistance measures, and defining staff responsibilities related to providing meaningful access for LEP individuals. Subrecipients of funding administered by MDT must independently ensure compliance with the subrecipient's specific LAP/LEP requirements.

MDT Brand Book (2026)



The MDT *Brand Book* provides guidance to reinforce MDT's identity and build the MDT brand by leveraging the department's reputation and relationships in the delivery of transportation solutions for Montana. The *Brand Book* includes specific guidelines for logo use, color palettes, fonts, voice, and imagery to help ensure consistency and cohesiveness in MDT's messaging. The guidelines require a minimum size, standard coloring with appropriate contrast, and appropriate clarity of the MDT logo to ensure ADA accessibility. The guidelines note that text should be no smaller than 8-point font, all font and color combinations should meet accessibility visual standards, and specific low-contrast color combinations such as red-green, green-yellow, and blue-yellow should be avoided to ensure ADA requirements for legibility are met. Social media images must include clear and concise alternative text (i.e., alt text) so that screen readers can read a description of the image. Caption text must be included in all videos with spoken words. Additionally, all printed materials, or materials available for printing, must include an appropriate accessibility statement providing individuals with information to obtain alternative accessible formats or reasonable accommodations to participate. If an accommodation is requested, the MDT External ADA Coordinator will be available to provide information in an accessible format or accommodation to participate.

Road Design Manual (2026)

The MDT RDM was developed to provide uniform design practices for MDT and consultant personnel preparing contract plans, specifications, and estimates for MDT projects. Although the RDM presents most of the information typically required in the design of a roadway design project, design teams must exercise engineering judgment when making decisions to execute a design approach that meets the desired outcomes within the context of that project. Designers should reference the ADA, PROWAG, and MUTCD as appropriate.

> **Chapter 2:** Basic Design Controls stipulates that projects should consider accessibility for all users. To understand accessibility needs, land use and roadway characteristics should be considered, such as the existing and future anticipated level of pedestrian activity. New construction projects should include appropriate accessibility accommodations, while rehabilitation and pavement preservation projects should determine the level of impact or alteration to any existing facilities and whether an existing facility needs to be upgraded to provide additional features.
>
> **Chapter 7:** Multimodal Design Considerations addresses design for all modes of travel, with specific sections focused on pedestrian facilities, shared-use paths, crossing treatments, and transit facilities. Section 7.3.2 outlines the special accessibility consideration given to pedestrians with disabilities including vision, mobility, or cognitive impairments. Guidance is provided for pedestrian walkways and crossings addressing obstructions, length, width, slope, ramps and landings, detectable warning devices, alignment, and individual treatment types.

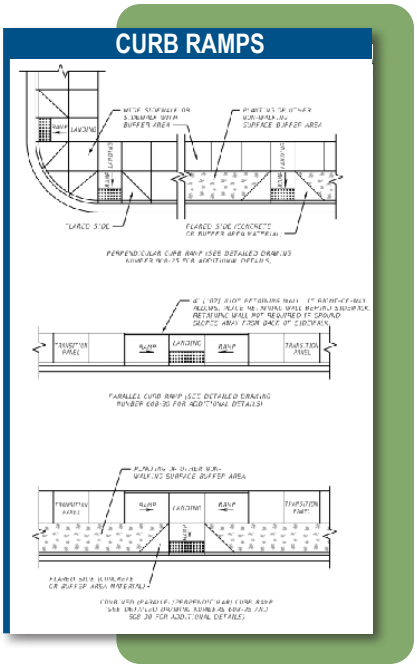
Additional sections of the RDM address accessibility considerations relating to intersection design, parking facilities, and roadside safety.

Detailed Drawings (2026)

The following are standard design details used on MDT projects related to ADA accommodations and accessibility, with selected notes listed below where applicable.

[608-05] Concrete Sidewalk: The minimum width of new sidewalk is 4 feet. The continuous clear width of pedestrian access routes is 4 feet min. The clear width between obstructions or an obstruction and the edge of sidewalk is 4 feet minimum Where factors such as limited right-of-way dictate the installation of a new sidewalk less than 5 feet in the width the new sidewalk must have passing areas at a maximum spacing of 200 feet. A passing area is a minimum of 5 feet by 5 feet in size. The desirable cross slope of the sidewalk is 1.5% while the maximum constructed cross slope is 2%.

[608-15] New Construction Curb Ramps: Use curb ramps in order of preference: perpendicular, combined parallel/perpendicular, parallel. A single curb ramp or blended transition corners serving two street crossing directions are not allowed in new construction and not recommended when altering existing facilities. Use the flattest slopes possible (5% min, 8.3% max in difficult site conditions) for all curb ramps. Do not place drainage structures in conflict with curb ramps. When altering existing facilities, meet new construction requirements to the maximum extent feasible. When ADA standards cannot be achieved, document with and ADA Statement of Technical Infeasibility Form (**Appendix D**).



[608-25] Perpendicular Curb Ramps, [608-30] Parallel Curb Ramps, and [608-35] Curb Ramp Design Options for Curb-Tight Sidewalks

- Desirable length of landing is 5 feet. The minimum landing length is 4 feet. If the landing is constrained on one or more sides, the minimum length is 5 feet.
- The desirable width of the curb ramp is 5 feet. The minimum width is 4 feet. The landing width is equivalent to the ramp width.
- The desirable slope for curb ramps is 5% to 7.1%. The maximum slope is 8.3%.
- The desirable slope for the flared side of the curb ramp is 8.3% or flatter. The maximum slope is 10%.
- The desirable cross slope of the sidewalk, ramp, or landing is 1.5% or less. The maximum is 2%.
- The slope of the sidewalk is equal to the street grade or flatter.
- Provide DWD on the bottom 2 feet of each ramp.
- There is no tolerance for exceeding maximum standards.
- Where existing site development conditions prohibit the strict and full compliance of all ADA criteria, provide accessibility to the maximum extent feasible. Document with an ADA Statement of Technical Infeasibility Form when ADA standards cannot be achieved.

[608-40] Detectable Warning Devices: Install DWDs that extend the full width of the ramp, 2 feet in depth. Embed the DWD directly into the concrete so the base plate is flush with the concrete and the domes protrude above the adjacent concrete surface.

[618-U05] Sidewalk Closures and Bypass Walkway: Ensure that entire walkway meets ADA requirements. Provide a minimum walkway width of 5 feet and a firm, stable, slip resistant walking surface along entire walkway. Provide temporary ramps and detectable edging (minimum 6-inch height) on both sides of walkway along temporary pedestrian detour route. Where speeds exceed 25 mph, physical barriers should be used to separate the walkway from vehicular traffic.

[619-00] Sign Clearances and Mounting Heights: Within the city limits or in a sidewalk and curb area, mount signs to have the proper clearances, but avoid any conflict between the post and the main walking area of the sidewalk, or with doorways or windows of adjacent buildings.

Standard Specifications (2026) and Special Provisions (2013)

The following are standard specifications and special provisions used on MDT projects related to ADA accommodations and accessibility. The specifications and provisions typically provide a description of the item, materials, construction requirements, method of measurement, and basis of payment. Selected notes are listed below where applicable.

[608] Concrete Sidewalks:

> 608.03.3 Detectable Warning Devices
>
> - General: Install DWDs as shown in the Detailed Drawings. If DWDs require cutting or modification, locate non-factory edges on the exterior side of DWD installation.
> - Retro-Fitting: Saw cut from existing sidewalk the minimum area required to allow installation. Remove the old sidewalk full depth within the cut area. Place new concrete meeting Section 608 requirements and install DWD in accordance with manufacturer recommendations.

[617] Traffic Signals and Lighting

617.03.5 Removing and Replacing Improvements

- Wherever a part of the existing concrete sidewalk is broken or damaged, remove the entire square or slab and replace the concrete as specified.

617.03.9 Advanced Flashing Beacons

- Furnish mounting hardware to mount the signal and sign as shown in Detailed Drawings.

617.03.17 Pedestrian Push Buttons

- Install the push button and sign on the crosswalk side of the pole with the arrow pointing in the direction of the crosswalk.
- Accessible Pedestrian Signals. Department personnel from the traffic engineering section must be present before activation to program accepted sound/volume settings. When voice messaging is required, submit a custom voice message detail sheet with the electrical material submittals.

[618] Traffic Control

618.03.2 Traffic Control Plan

- Pedestrian Traffic Control. Always provide ADA compliant temporary measures for pedestrian facilities. If closures of pedestrian routes are required, identify the proposed measures to warn, direct, and guide pedestrian traffic.

[703] Lighting and Signal Materials

703.08 – Traffic and Pedestrian Signals: Furnish pedestrian signal indications which utilize LEDs in accordance with the latest issue of the ITE Pedestrian Traffic Control Signal Indication specification and the MUTCD. Furnish 16-by-18-inch pedestrian indications that utilize LEDs for the “UPRAISED HAND” symbol, the “WALKING PERSON” symbol and the countdown display. Furnish indications with a countdown display that is at least 9 inches in height.

703.10 – Pedestrian Push Buttons: Furnish tamper-proof pedestrian push buttons meeting ADA requirements. The push button must be flush with the housing and be at least 2 inches in the smallest dimension. The push button housing must be weatherproof and electrically insulated to prevent shock.

703.10.1 – Accessible Pedestrian Signals (Tactile Push Buttons): Furnish APS that include the pedestrian push button and housing combination with a locator tone to indicate the location of the button. The volume of the locator tone must automatically adjust to ambient noise level. The button must have a raised arrow, which can be adjusted to point toward the appropriate crosswalk. The APS must also provide information that a call for service has been placed in the form of a lit LED and an audible indication. The accessible signal must also provide vibro-tactile information, in the form of the button vibrating during the appropriate Walk signal. When voice messaging is required, provide accessible pedestrian signal stations with custom voice messages that provide location information on a button push, and street crossing message when the appropriate walk signal activates.



Shared-Use Paths Inventory (No Date)

In accordance with MCA 60-3-304, MDT maintains an inventory of shared-use paths located within the right-of-way of state-maintained federal-aid highways in Montana. MDT's statutory responsibilities also include recommending construction and maintenance standards for shared-use paths, providing a uniform system of signing for shared-use paths statewide, and allocating available funds for path maintenance, repair, and establishment.

Several local agencies have maintenance agreements with MDT to maintain shared-use paths within their jurisdiction. Based on these maintenance agreements, local agencies are responsible for approximately 60% of path maintenance activities within state right-of-way. However, many jurisdictions have difficulty meeting their maintenance obligations due to lack of funding, limited personnel, and insufficient equipment.

Public Involvement Plan (No Date)

MDT recognizes that engaging the public early and throughout the transportation decision-making process is key to building trust and credibility for the department and enhancing the awareness and understanding of MDT actions and business practices. The MDT *Public Involvement Plan* provides guidance to MDT staff, consultants, and subrecipients to offer opportunities for public input at key decision points in planning and project development. To ensure all individuals have equal opportunity to participate, MDT requires that a standard ADA disclaimer providing information on accessible alternative accommodations be included on all printed material. Additionally, all videos must be closed captioned or a corresponding script must be provided.

Chapter 2
PUBLIC AND STAKEHOLDER OUTREACH

Public and stakeholder input is an essential element in the transition plan development and self-evaluation processes. ADA implementing regulations require public entities to provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the self-evaluation process and development of the transition plan by submitting comments (28 CFR 35.105(b) and 28 CFR 35.150(d)(1)).



2.1 INVOLVEMENT STRATEGIES

MDT used the following on-demand and targeted engagement strategies during the plan update process to elicit meaningful participation from a wide-ranging audience.

Website

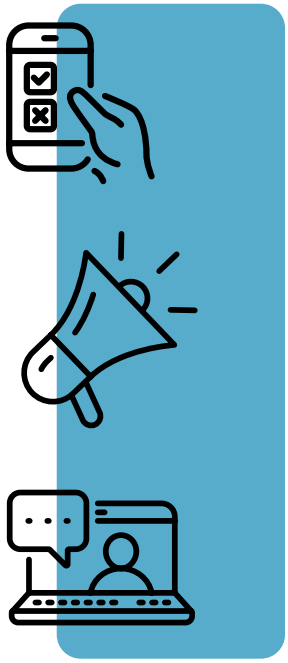
A project website was used to encourage public interaction and to provide information about the plan update. The website was hosted by MDT and updated throughout the planning process. Informational material posted to the website included a description of the *ADA Transition Plan Update* process, contact information, meeting announcements, frequently asked questions (FAQs), and published documents.

Social and Traditional Media

MDT announced the availability of the draft *ADA Transition Plan Update* on its social media platforms. Social media posts encouraged the public to review the plan, participate in the online open house, and submit feedback to MDT. Additionally, MDT issued a statewide press release announcing the public review period and online open house.

Online Open House

During the public review period, MDT hosted an online open house to explain the *ADA Transition Plan Update*, summarize key findings, and share relevant updates to the plan. The MDT website provided links to a pre-recorded video, informational summary sheets, MDT contacts, and the MDT online comment form. Members of the public were invited to view information and submit comments at their convenience during the public review period.



2.2 PLAN AVAILABILITY AND PUBLIC REVIEW PERIOD

The draft *ADA Transition Plan Update* was made available for public review and comment from October 19 through November 20. A link to the draft document was provided on the MDT ADA webpage and emailed to approximately 60 stakeholder representatives.

Summary of Public Comments

PENDING

Chapter 3
ADA PROGRAM METHODS

In support of the MDT mission and ADA policy, and in alignment with other plans and documents relating to ADA, the following sections outline methods MDT uses to make its programs, right-of-way features, and building facilities accessible to individuals with disabilities in fulfillment of 28 CFR 35.150(d)(3)(ii).



3.1 ADMINISTRATION

MDT is committed to administer, provide oversight responsibilities, and ensure compliance with the law and federal and state guidance relating to ADA compliance. The Civil Rights Bureau ensures MDT conducts business in an environment free of discrimination, harassment, and retaliation on the grounds of protected status, including physical or mental disability, in all state, federal and federally assisted MDT programs.

METHOD 1

EMPLOY AN EXTERNAL ADA COORDINATOR

ADA implementing regulations require public entities to designate at least one employee to coordinate efforts to comply with and carry out ADA responsibilities. The External ADA Coordinator resides within the MDT Civil Rights Bureau, whose mission is to ensure all beneficiaries and potential beneficiaries of MDT programs are offered an equal participation opportunity.

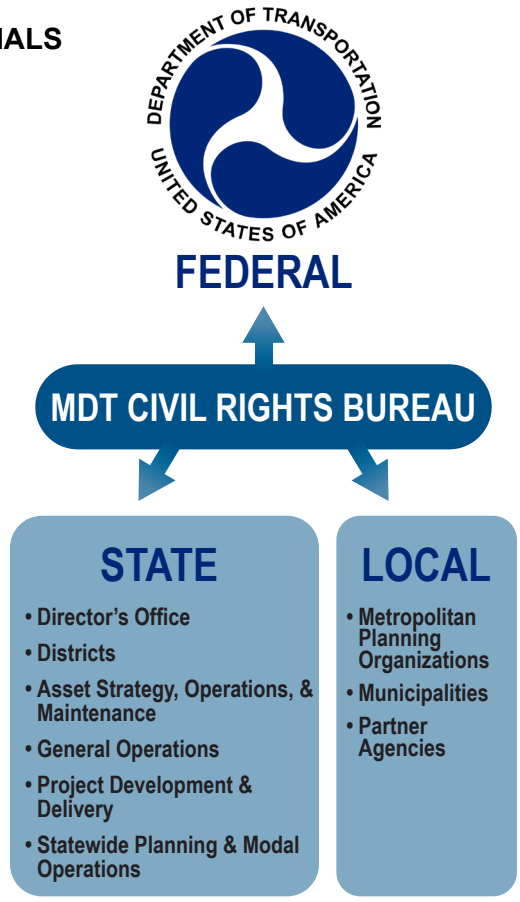
MDT's External ADA Coordinator is responsible for guiding MDT's program to ensure people with disabilities have opportunities to use the transportation system within MDT right-of-way. The external ADA program oversees and guides the implementation of the plan to provide accessible public rights-of-way and facilities. The external coordinator is a department-wide resource and helps to ensure consistent statewide application of MDT's ADA policies and procedures in support of the plan. Other responsibilities of the external coordinator include responding to ADA inquiries, providing technical guidance on ADA standards during design and construction activities, overseeing ongoing data collection and reporting requirements, responding to requests for accessible materials or auxiliary aids and services, and conducting or arranging ADA training for employees throughout the department. Contact information and a role description for the MDT External ADA Coordinator are provided on MDT's website.

METHOD 2

CONDUCT OUTREACH WITH TRANSPORTATION OFFICIALS

The MDT Civil Rights Bureau regularly coordinates with state, local, and federal transportation officials to discuss the MDT external ADA program, advance progress of the MDT *ADA Transition Plan*, and coordinate ADA decisions related to project identification, delivery, and operations. Coordination extends to the Asset Strategy, Operations & Maintenance Program Area, General Operations, Project Development & Delivery Program Area, Statewide Planning & Modal Operations Program Area, MDT districts, Federal Highway Administration (FHWA), metropolitan planning organizations (MPOs), and other local partner agencies. Regular collaboration occurs on ADA-related topics, including data management, project prioritization and identification, inventory status, funding recommendations, public comments, changes in regulations and policies, and issues relating to design, construction, and maintenance.

Additionally, the MDT External ADA Coordinator regularly collaborates with MDT districts on ADA issues and needs within each geographic area, including consideration of curb ramp demand and compliance status, priority areas for barrier removal, planned projects within each district involving ADA upgrades, and accessibility and connectivity needs within specific communities.



METHOD 3

COORDINATE WITH REPRESENTATIVES OF THE DISABILITY COMMUNITY

The MDT External ADA Coordinator works closely with advocacy groups and individuals with disabilities to identify critical ADA needs and obtain feedback on the MDT external ADA program. MDT maintains a list of ADA stakeholders which includes numerous organizations representing the disability community, including regional independent living centers located throughout the state. MDT regularly consults with these organizations to coordinate community education and outreach and periodically provides updates on MDT's ADA policies and procedures. MDT welcomes feedback from these organizations and strives to consider all comments to ensure the disability community is fairly represented through MDT's ADA program. Additionally, MDT personnel may invite disability community representatives to participate in walk audits during project scoping activities as appropriate to better understand ADA needs from the perspective of individuals with disabilities.

METHOD 4

PROVIDE PUBLIC NOTICE ABOUT ADA REQUIREMENTS

Under Title II, MDT must make information about ADA requirements pertaining to its services, programs, and activities available to the public. MDT maintains an external ADA website (mdt.mt.gov/business/contracting/civil/external-ada.aspx), which includes a description of the external ADA program, ADA coordinator contact information, and links to MDT's *ADA Transition Plan*, public notice document, complaint procedures form, applicable federal regulations, and other ADA-related information.

METHOD 5

PUBLISH GRIEVANCE PROCEDURES FOR RESOLUTION OF ADA COMPLAINTS

Public entities employing at least 50 people are required to adopt and publish grievance procedures providing prompt resolution of complaints. MDT's complaint procedure and form are located on the Civil Rights Bureau website accessed through the following link: mdt.mt.gov/business/contracting/civil/external-ada.shtml. Alternative accessible formats are available upon request. The complaint form provides a mechanism to document and track complaints. MDT develops action items in response to each complaint and strives to resolve complaints through mediation.

METHOD 6

PROVIDE A MECHANISM FOR TRACKING NON-GRIEVANCE ADA COMMUNICATION AND INFORMAL INQUIRIES

MDT offers the opportunity for the public to submit inquiries regarding any ADA-related issue via a comment form on the MDT website. The form captures ADA inquiries that do not constitute a formal grievance complaint but involve ADA external policies, decisions, or physical assets. MDT considers public feedback and inquiries and provides an appropriate response to each comment. The comment form is available at the following link: mdt.mt.gov/mdt/comment_form.shtml. Alternative accessible formats are available upon request.

METHOD 7

PROVIDE WRITTEN ASSURANCE GUARANTEEING NON-DISCRIMINATION

As a condition of federal aid under Section 504 of the Rehabilitation Act of 1973 (49 CFR 27.9), MDT must guarantee non-discrimination and ensure new projects will be ADA compliant. MDT includes a non-discrimination agreement on all federally funded projects. The document requires MDT to comply with federal statutes, policies, and procedures. The document states no person may be excluded from federally funded programs on the grounds of race, color, religion, national origin, sex, age, disability, and genetic information, with additional protected classes identified at the state level. ADA compliance must also be assured on all federally funded projects conducted by sub-recipients of federal funds.

METHOD 8

ENSURE PERSONNEL ARE APPROPRIATELY TRAINED REGARDING ADA REQUIREMENTS

MDT facilitates varying levels of ADA training to employees depending on personnel involvement with ADA. MDT district and headquarters personnel receive training addressing inventory, design, review, construction, and maintenance of ADA features in support of the ADA policy statement. This training reinforces the importance of ADA regulations and educates personnel on applicable ADA requirements. MDT personnel seek opportunities for continuing ADA training and may participate in walk audits during project scoping activities to understand ADA needs from the perspective of individuals with disabilities.

3.2 COMMUNICATIONS

Government agencies must communicate and interact effectively with the public. MDT uses various communication methods to assist the disability community including auxiliary aids, services, information, and signage. MDT attempts to eliminate communication barriers by offering a variety of auxiliary aids and services to the disability community upon request.

METHOD 9

OFFER AUXILIARY AIDS AND SERVICES TO ELIMINATE COMMUNICATION BARRIERS

Communicating by telephone can be a hardship for people with hearing or speech impairments. To address this difficulty, MDT lists the Montana Relay number (operated by the Montana Telecommunications Access Program) in a variety of MDT documents including press releases and public meeting notifications, brochures, and on the MDT website. To address language barriers, MDT maintains a list of interpreters speaking multiple languages including sign language, with information regarding interpreter location, contact information, conversation skill, reading/writing skill, fees, and qualifications.

The three primary auxiliary aids for people with a vision disability include Braille, enlarged text, and audio documents. MDT documents can be provided in Braille, large text, or converted to an audio format upon request. Additionally, the MDT website offers accessibility tools to heighten color contrast and provide enlarged text to improve readability for individuals with sight impairment.

In addition to commonly used auxiliary aids and services, MDT makes efforts to provide additional aids and services upon request. MDT strives to provide accessible information to the public and attempts to accommodate all disability types.



METHOD 10

INFORM THE PUBLIC OF ACCESSIBLE SERVICES, ACTIVITIES, AND FACILITIES, AND SHARE INFORMATION ABOUT ADA PROJECTS

Title II requires public entities to ensure individuals with disabilities can obtain information about the existence and location of accessible services, activities, and facilities. In support of this requirement, the MDT Brand Book provides instructions on using accessibility statements addressing reasonable accommodations for training events, public meetings, hearings, and open houses, with alternative accessible formats or accommodations to facilitate public participation in MDT programs and services.

MDT's website is a key platform for providing information to the public. To ensure accessibility, information provided on the website must be compatible with appropriate software to accommodate specific disabilities. MDT provides appropriate software programs upon request to assist with web accessibility. Additionally, MDT is working to comply with USDOJ implementing regulations addressing accessibility of web content and mobile applications.[1] An example of MDT's web accessibility efforts is to provide alternative text for figures and charts describing the image to aid individuals who are blind and use a screen reader to deliver online information.

Signage is another major aid in providing public information and direction. MDT follows ADA design guidelines to ensure signs are readable and accommodating to the disability community. Sign standards include the use of large letters and symbols accompanied by Braille. The standards are the foundation for providing clear informational and directional signage to all members of the public.

MDT also works with public involvement specialists to share information about projects involving targeted improvements to ADA features. Outreach efforts typically include a project overview, education about why accessibility improvements are needed, construction updates, and the opportunity for public comment.



[1] The USDOJ Interim Final Rule for 28 CFR Part 35 published April 20, 2026, extended the compliance date for state and local government entities from April 24, 2026, to April 26, 2027.

3.3 RIGHTS-OF-WAY

Under Title II of the ADA, MDT must ensure all of its physical assets are ADA compliant, including existing and newly constructed features. Right-of-way features include elements such as curb ramps, sidewalks, crosswalks, median crossings, and APS systems.

ADA-compliant rights-of-way are designed and constructed in a manner readily accessible and usable by individuals with disabilities. Examples of non-compliant accessibility barriers include steep curb ramp slopes or sidewalk discontinuities that may cause trip hazards.

The following sections discuss methods for rights-of-way inventory data collection, data tracking, and methods for removing physical accessibility barriers.

ADA Inventory

METHOD 11

MAINTAIN AN INVENTORY OF EXISTING ADA FEATURES

Program evaluation is necessary to identify where physical barriers limit accessibility within MDT's transportation system. This self-evaluation process provides an assessment of current compliance status to assist MDT in prioritizing actions and monitoring progress, making the process critical to the success of the MDT *ADA Transition Plan*.

In fulfillment of this requirement, MDT conducted a complete statewide assessment of its intersection right-of-way features in the summer of 2015. Through an initial pre-screening procedure, rural conditions were reviewed using aerial photography and street view coverage to determine if dedicated pedestrian facilities were present. Field visits were conducted on the remaining intersections. Approximately 16,000 individual curb ramp locations were inspected to identify any deficiencies in existing right-of-way elements. The curb ramp inventory also included identification of the presence of sidewalk at each curb ramp and whether the sidewalk was continuous to the adjacent intersection. Inventory of signalized intersections included accessible pedestrian signals. The primary objective of the data collection effort was to record barriers using a consistent and disciplined methodology that included measurement of the most restrictive condition. This technique established baseline parameters against which progress toward overall compliance can be demonstrated.

Since 2015, MDT continues to conduct ongoing inventory as new improvements are constructed and accessibility barriers are removed through programmed projects and ongoing maintenance efforts. MDT continually strives to evaluate and implement new technologies to improve data collection efficiency and accuracy.

MDT maintains a geodatabase of ADA right-of-way features. The database enables MDT to query data, summarize data sets in output reports, conduct annual reporting, and track progress toward compliance.

METHOD 12

CONSIDER ADA INVENTORY SYSTEM COMPATIBILITY WITH OTHER APPLICABLE DATA MANAGEMENT SYSTEMS

MDT uses multiple inventory and data management systems to collect data. For example, construction personnel collect field data on constructed project features and are responsible for completing ADA ramp documentation spreadsheets including measurements of constructed ramp features before project close out. Similarly, the Traffic and Safety Bureau maintains an inventory of traffic signals, and MDT continues to incorporate ADA data into other business processes including the tentative construction program (TCP) and active projects. MDT works closely with its divisions and bureaus to incorporate ADA data from various sources into the ADA database and eliminate duplicative efforts. The ADA database may evolve to consider compatibility with other data management systems.

METHOD 13

SCORE RIGHT-OF-WAY FEATURES TO IDENTIFY CRITICAL ADA NEEDS

MDT uses a composite system to score its right-of-way infrastructure and assigns points based on demand and ADA compliance. A higher score indicates a non-compliant feature with high demand, while a lower score indicates a compliant curb ramp with low demand. Composite scores are used to group and classify barriers according to MDT districts, counties, communities, and corridors.

ADA implementing regulations (28 CFR 35.150(d)(2)) note transition plans should give priority to walkways serving entities covered by the Act, including state and local government offices and facilities, transportation, transit, places of public accommodation, and employers, followed by walkways serving other areas. The Montana structures framework is a statewide spatial database of structure and address points used to assign demand scoring for right- of-way features based on proximity to prioritized structure types. Lower scores are assigned to features in areas with a low density of prioritized demand generators, and higher scores are assigned to features within proximity to a high density of prioritized demand generators, with a maximum score of 10 per curb ramp.

Compliance scores are calculated by assigning a score of zero for fully compliant features and allocating points for non-compliant curb ramp elements, with a maximum score of 10 per curb ramp.

Composite curb ramp scores are calculated by multiplying the demand score by the compliance score, with a maximum possible score of 100 indicating a fully non-compliant ramp or an undeveloped ramp in an area of high demand. **Appendix C** contains a scoring report of inventoried assets compiled by MDT district, county, urban area, and community.

Figures 1 and **2** on the following page summarize the steps involved in the curb ramp scoring process as well as the possible ranges for curb ramp scores.

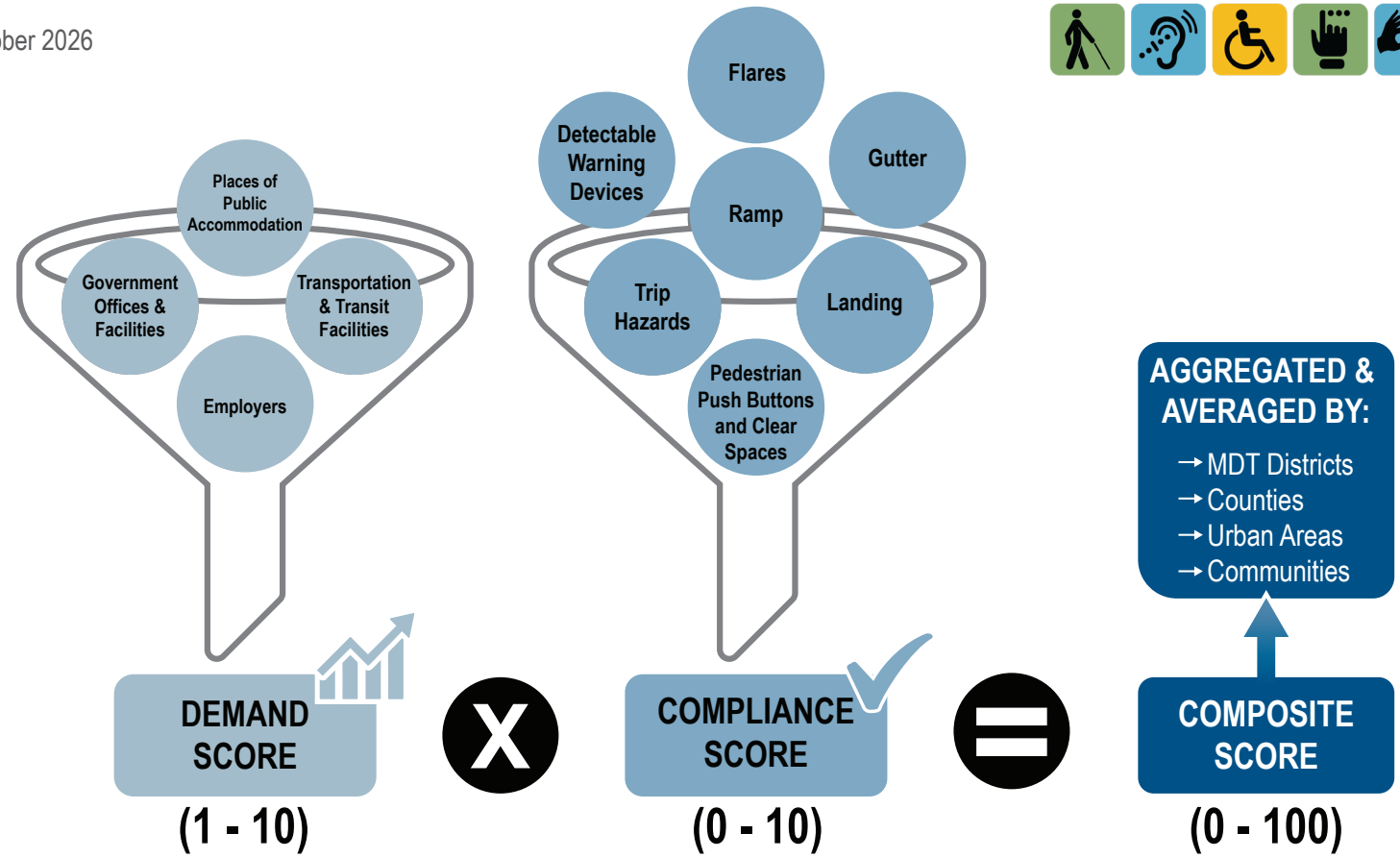


Figure 1: *Scoring Process Summary*

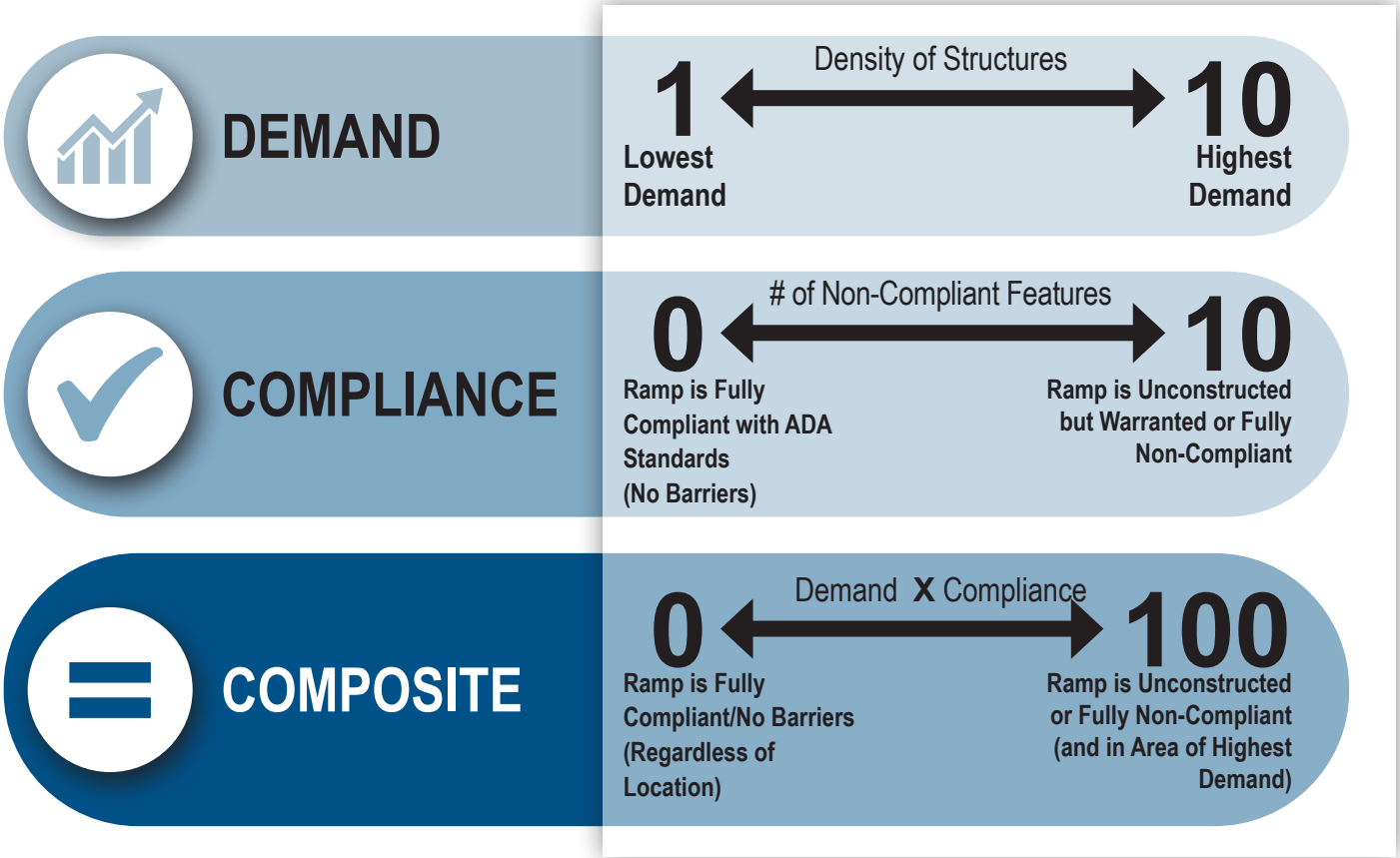


Figure 2: *ADA Curb Ramp Possible Scoring Ranges*

Project Identification

METHOD 14

IDENTIFY PROJECTS USING RISK-BASED ASSESSMENT OF DEMAND AND COMPLIANCE SCORING, IN COMBINATION WITH SAFETY PERFORMANCE, PROXIMITY TO PROGRAMMED PROJECTS, LOCAL PLANNING, AND PUBLIC AND STAKEHOLDER FEEDBACK

Curb ramp scoring provides an initial indication of risk level for individual ADA features. The compliance score alone indicates the number of non-compliant features, while the composite score incorporates a demand evaluation indicating the potential level of pedestrian usage. Together, these scores serve as a starting point for MDT to identify critical areas in need of barrier removal.

As shown in **Figure 3**, MDT also considers a range of additional factors to identify and prioritize ADA improvement projects. Safety performance influences project identification, and an identified mode conflict or crash trend at a particular location may provide further justification for an ADA improvement project. MDT considers projects identified in the *Statewide Transportation Improvement Program* (STIP), local planning efforts, and improvements to adjacent infrastructure already in process. MDT also considers public input and maintains a documented response process for comments regarding ADA. MDT relies on a collaborative process with internal and external stakeholders to identify areas of greatest need that can best be served by ADA improvements.

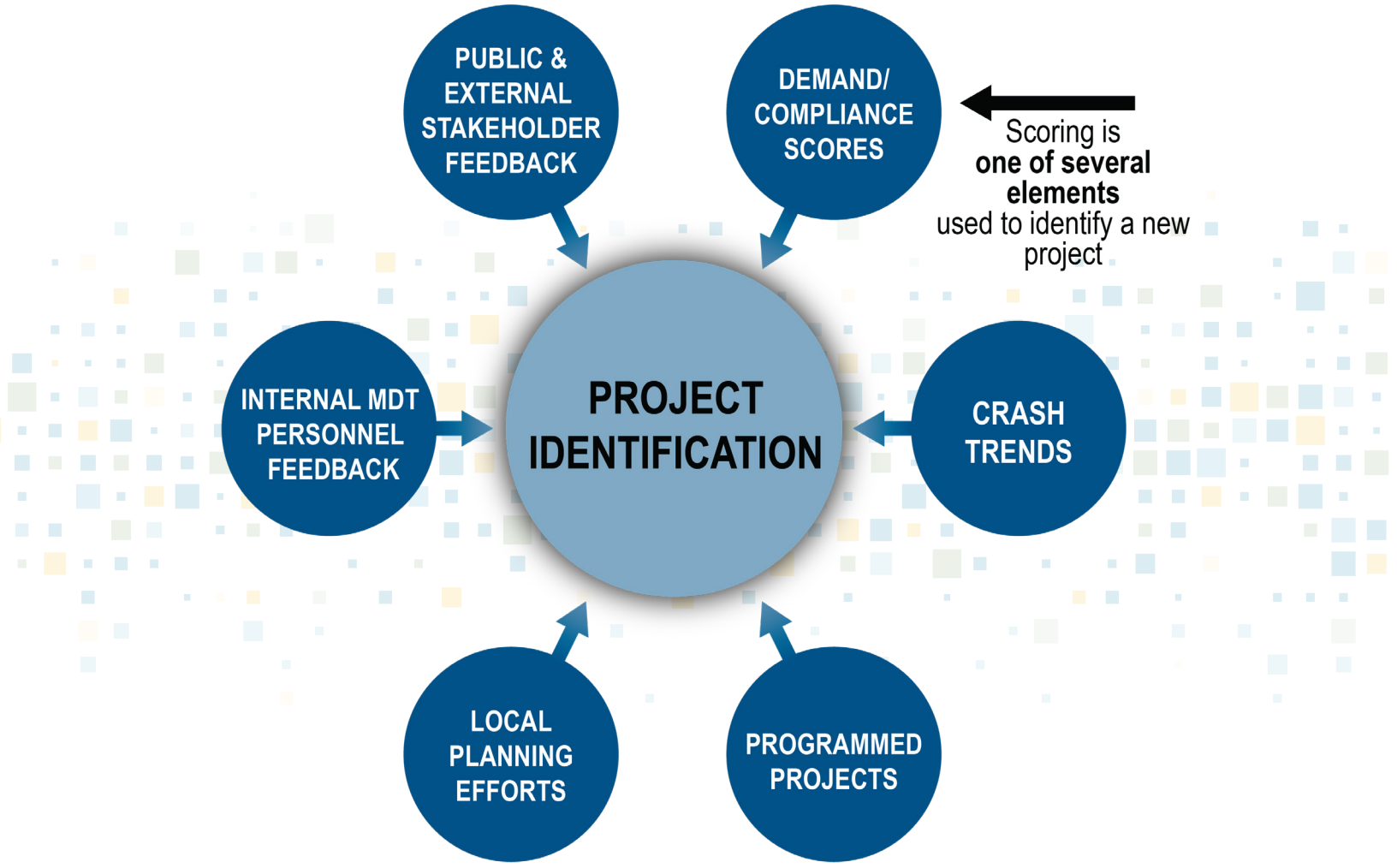


Figure 3: *Project Identification Components*

1,303
Curb Ramps

325
Accessible Pedestrian Signals



~92,000
Linear Feet of Sidewalk



57
Projects

41
Montana Communities

2022 through 2026 Construction

Note: Approximate sidewalk lengths were calculated from square yardage listed in project bids assuming a standardized width of 5 feet. Actual, constructed sidewalk lengths may vary.

METHOD 15

CONSIDER ADA COMPLIANCE USING AN ASSET MANAGEMENT METHOD

Asset management is a business process for resource allocation and is driven by defined objectives and credible data from systematic assessments to justify investment decisions. An asset management approach provides many benefits, including objective, justifiable decision making; improved performance and service to customers; enhanced credibility, transparency, and accountability; lower long-term costs for infrastructure preservation; and improved use of available resources.

MDT uses an asset management method to develop an optimal investment plan and measure progress in moving toward strategic transportation system goals. Using this method, projects programmed for construction must address both a specific transportation need and contribute to overall transportation system performance goals. MDT considers feedback from customers, available resources, and system performance data to support investment decision making. Proposed projects are evaluated for consistency with guidance on funding allocation before they are selected and programmed for construction.

MDT assesses and monitors the condition of the transportation system using computer-based management systems. ADA compliance data (including the number of non-compliant features at a specific location or along a corridor) is used to measure and track progress toward eliminating accessibility barriers within the state's transportation system. This information ultimately informs funding guidance and development of performance targets for ADA compliance.

METHOD 16

DETERMINE AVAILABLE FUNDING SOURCES

MDT uses multiple funding sources to deliver ADA improvements. ADA elements are eligible for funding under all federal programs and are routinely incorporated in bridge and roadway projects funded through MDT's core program. Funds for core program roadway projects are allocated to districts by type based on MDT's Performance Programming Process (Px3) asset management system recommendations.

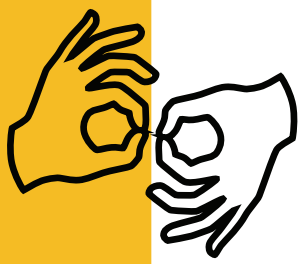
In addition to core program funds, MDT uses Congestion Mitigation and Air Quality Improvement Program (CMAQ) funds to finance some of MDT's independent ADA improvement projects. The primary purpose of these projects is to specifically address non-compliant ADA features within a designated project area. The MDT Traffic and Safety Bureau also uses discretionary CMAQ funds for improvements to traffic signals, and in many cases, these projects incorporate ADA improvements. MDT will continue to evaluate funding availability under the CMAQ program and consider the program's effectiveness in targeting ADA barriers.











Pedestrian improvements may be funded through the competitive Transportation Alternatives (TA) program. Under this program, local project sponsors submit applications, which are scored using a range of criteria which may include ADA compliance levels. Selected projects may be administered by the MDT Consultant Design Bureau or local agencies. Cities that employ 50 or more persons are required to develop an ADA transition plan.

Rest area facilities, including ADA-compliant buildings and site amenities, are funded through MDT's long-range facility program, in coordination with the Department of Administration's Architecture and Engineering Division, and are prioritized using MDT's *Rest Area Plan* and the Statewide Rest Area Prioritization Plan Committee's asset management approach.

MDT administers a variety of federal and state capital and operating grant and loan programs to help qualified organizations provide public transportation. Operating grants support the day-to-day delivery of transit service, including services specifically addressing the needs of elderly and disabled populations to facilitate integration into the workforce and society, but do not fund physical ADA improvements.

Capital grants, by contrast, may be used to support metropolitan, regional, and rural transit planning studies, and equipment and facility-related purchases, including ADA-related vehicle and facility upgrades. MDT administers federal transit capital funding to support these investments across the state's transit providers.

Capital funding requests are scored competitively by the Capital Assistance Review Committee and MDT's Transit Section based on capital need, program management, and local prioritization. Facility condition is tracked using the Federal Transit Administration (FTA) Transit Economic Requirements Model (TERM) rating scale, and ADA-compliant features are incorporated as appropriate within the scope of funded facility projects.

Combined funding packages, including partnerships with local communities, are also used to help fund ADA improvements or extend the scope of ADA improvements addressed in a project that is primarily funded through other sources. For example, local projects such as overlays and utility replacements could be funded through a combination of local and MDT project funds to extend the scope of the local project to include ADA improvements.

ADA improvements may also be funded in part by developers who initiate projects that may impact the transportation system. MDT reviews private projects through the system impact action process to ensure impacts to the transportation system meet MDT design criteria and costs are recovered as appropriate.

METHOD 17

IDENTIFY LEVEL OF ADA EFFORT ASSOCIATED WITH PROJECT TYPE

MDT identifies the appropriate level of ADA involvement depending on project classification, including new construction, reconstruction, rehabilitation, resurfacing, and preventative maintenance projects. In the case of resurfacing and rehabilitation projects involving alterations to existing infrastructure, existing pedestrian facilities are upgraded to meet ADA requirements to the maximum extent feasible (see **Method 25**), and new curb ramps are considered wherever curb, gutter, and sidewalk are adjacent to the project. Existing and potential pedestrian use is evaluated to determine possible ramp locations. FHWA guidance specifies that an alteration to existing infrastructure includes the addition of a new layer of asphalt, reconstruction, concrete pavement rehabilitation and reconstruction, open-graded surface course, micro-surfacing and thin lift overlays, cape seals, and in-place asphalt recycling. MDT complies with this guidance.

Installation of ADA features is generally not considered on routine or preventative maintenance activities such as painting or striping lanes, crack filling and sealing, surface sealing, chip seals, slurry seals, fog seals, scrub sealing, joint crack seals, joint repairs, dowel bar retrofit, spot high-friction treatments, diamond grinding, and pavement patching. Projects should not be under-scoped in an attempt to avoid the need to provide ADA upgrades. For example, a resurfacing project should not be shortened to end at the start of a section of roadway that has existing curb, gutter, or sidewalk. Conversely, ADA work would be beyond the scope of a micro-surfacing project on an intersection where no curb, gutter, or sidewalk currently exists.

METHOD 18

CONSIDER PROJECT FACTORS AND OPPORTUNITIES TO ENHANCE ADA PROJECT DELIVERY

In nominating a project involving ADA features, MDT considers factors such as consistency with local and MDT plans, logical termini and connectivity with existing facilities, storm water and drainage facility conflicts, right-of-way ownership, utility conflicts, rail intersections, and level of environmental documentation. These factors may affect project limits and level of complexity.

It is important to identify and maintain the primary project purpose. However, MDT also considers opportunities to address multiple needs concurrently to optimize investment and to enhance mobility and connectivity for all users. MDT's approach is to comprehensively address accessibility needs within the limits of all stand-alone ADA projects. In addition to addressing curb ramps at intersection corners identified through the scoring process, MDT addresses mid-block crossing barriers at approaches, reconstructs non-compliant sidewalk, and constructs new sidewalk to provide accessible connections within the project limits. MDT also considers accessibility enhancements for pedestrian facilities with larger highway improvements, as appropriate within the scope of each project. Additionally, it may be beneficial to incorporate other associated intersection improvements addressing geometry or traffic signal upgrades at the time of an ADA upgrade project, or to address needed pavement preservation concurrently with high-priority ADA improvements.

Communication between MDT district and headquarters staff, local government officials, regional independent living centers and other stakeholders, and members of the public is critical to ensure identification of related needs and projects. MDT recognizes the importance of considering each project's connection to adjacent pedestrian routes outside the project limits and broadly supporting pedestrian mobility and access. Project limits may be modified during the project scoping process in response to identified needs based on available funding. Modifications must meet the project purpose and need.

METHOD 19

COORDINATE WITH PARTNER AGENCIES TO IDENTIFY LOCAL PROJECTS AND FUTURE DEVELOPMENT ACTIVITIES

MDT regularly communicates with partner agencies, including cities, counties, MPOs, and tribal governments, to discuss upcoming projects and anticipated future developments. This information helps MDT identify and plan its ADA improvements to coordinate with local efforts. In some cases, opportunities for coordinating project phasing may benefit MDT and local entities by incorporating ADA elements into larger projects and avoiding costly re-work at a future date.

MDT also encourages local governments to prepare ADA transition plans addressing right-of-way features under local jurisdiction. Local plans can help identify needs and define priorities for barrier removal.

METHOD 20

ESTABLISH AND DOCUMENT MAINTENANCE RESPONSIBILITY

MDT's practice is to execute maintenance agreements with local jurisdictions to address responsibility for sidewalks and pedestrian facilities adjacent to MDT routes. These agreements outline obligations relating to labor and costs for facility design, construction, and maintenance such as snow removal and repair activities. In other cases, local ordinances sometimes require adjacent landowners to accept responsibility for maintaining and clearing sidewalks. To minimize complications during project delivery, it is important to discuss maintenance responsibility early in the project identification process. All parties should understand and agree to the scope of work for the project, including the specific ADA features that will be designed and constructed. Waiting to document maintenance obligations after a project has already been constructed can lead to miscommunication about roles and responsibilities. MDT coordinates with local jurisdictions prior to project development to ensure maintenance responsibilities are defined.

Figure 4 summarizes MDT's project identification and implementation process (**Methods 14** through **20**) as it relates to ADA improvements.

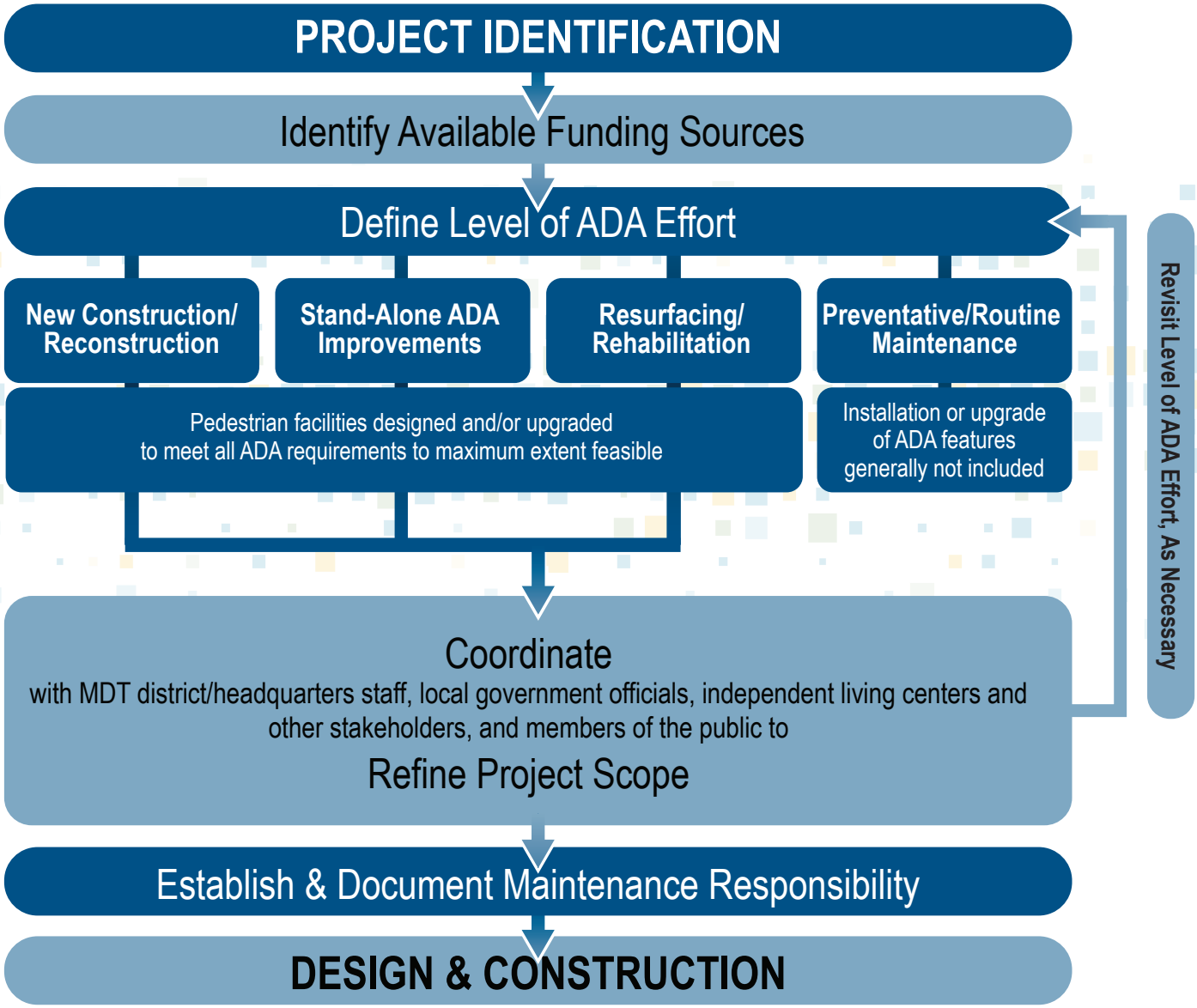


Figure 4: *MDT's Project Implementation Process*



Design and Construction

METHOD 21

CONSIDER RISK TO DETERMINE APPROPRIATE PROJECT DELIVERY METHOD

MDT uses multiple mechanisms to deliver its projects, including traditional design-bid-build as well as alternative delivery methods, as outlined in the May 2023 memorandum and flowchart addressing the alternative project delivery decision process. MDT considers risk, project scope and complexity, roadway system and jurisdiction, schedule considerations such as timing of funding obligations, and other factors to determine the best method for delivering each project.

ADA improvements included as part of a larger roadway rehabilitation or reconstruction project may be less complex than retrofit improvements within an existing roadway profile due to elements such as existing grades, obstacles, and available right-of-way. MDT will consider these factors to determine the best method for delivering ADA-compliant features.

METHOD 22

ASSIGN APPROPRIATE STAFF TO DESIGN AND REVIEW ADA DOCUMENTS

ADA improvements are designed and reviewed by MDT subject matter experts (SMEs) trained in ADA design, construction, and retrofit complexities. In addition to overseeing ADA design efforts, ADA SMEs are also responsible for making ADA design decisions and determining the appropriate design response for a particular project through constant communication and coordination with MDT district personnel. MDT maintains an ADA decision matrix that provides design guidance for a variety of modification or retrofit scenarios. MDT also maintains a documented procedure to ensure all entities are committed to the selected design response. The External ADA Coordinator provides additional review as necessary and works closely with SMEs to ensure adherence to applicable ADA regulations and policies.

METHOD 23

DESIGN ADA IMPROVEMENTS IN ACCORDANCE WITH APPLICABLE MDT DESIGN CRITERIA AND FEDERAL REGULATIONS

MDT has established criteria and policies that provide guidance for installation of accessible features on newly constructed or altered public rights-of-way and facilities. The ADAAG and PROWAG are the two sets of guidelines for design of accessible features on new construction and alterations.

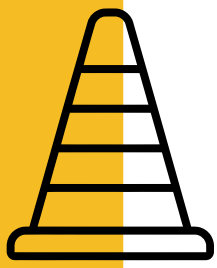
The Access Board developed ADAAG in 1991 and continues to maintain these guidelines for the design of accessible buildings and facilities. ADAAG focuses mainly on buildings and site work and generally does not address conditions unique to public rights-of-way. Due to the need for accessibility guidelines specific to the public rights-of-way, the Access Board developed the PROWAG, which is the current set of guidelines for design of accessible features in public rights-of-way. These guidelines have been identified as a current best practice by the FHWA for elements not fully addressed by ADAAG.

MDT has designed projects in accordance with the design guidelines referenced above since their adoption in 1991. MDT has officially adopted PROWAG for accessible design features on transportation projects following current best practice recommendations.

MDT maintains a compilation of detailed drawings in accordance with PROWAG for use on new construction or alteration projects. The drawings include technical information with respect to sidewalk and curb ramp dimensions, slopes, materials, and installation requirements. Additionally, project-specific details are commonly developed to address unique aspects of individual projects. MDT requires contractors to construct and ensure compliant features. During construction, MDT construction project managers ensure curb ramps, sidewalks, and DWDs are installed according to the appropriate details.

MDT conducts regular reviews of plans and specifications during the design process. This process encompasses review of any ADA elements on the project to verify compliance with ADA criteria.





METHOD 24

DESIGN ADA FEATURES TO ALLOW CONSTRUCTION FLEXIBILITY

Designing a pedestrian feature at the threshold of ADA requirements can cause difficulty in the field during construction. Without room for error or field fitment, the feature may inadvertently be constructed in exceedance of ADA thresholds, resulting in non-compliance. For example, a ramp cross slope designed to meet the 2% required maximum may be constructed at a slope of 2.1% due to a variety of unforeseen field conditions or construction methods. To avoid this difficulty, MDT strives to design ADA features to allow for construction flexibility in matching site constraints.



METHOD 25

APPLY DOCUMENTED PROCESS TO DETERMINE TECHNICAL INFEASIBILITY

In some situations involving improvements to existing infrastructure, it is infeasible to fully comply with ADA requirements within the scope limitations of the project. ADA criteria and design guidelines recognize that terrain, right-of-way availability, underground structures, adjacent developed facilities, drainage, or the presence of a notable natural or historic feature may limit full ADA compliance. In these situations, compliance must be provided to the maximum extent feasible.

MDT uses its technical infeasibility form to determine and document these conditions on each project, and the forms are subsequently revisited during any future project activities at the location. Cost is not a factor in determining feasibility, and technical infeasibility is not considered during compliance scoring. MDT's technical infeasibility form can be found in **Appendix D** or online at mt.accessgov.com/mdt/Forms/Page/mdt-pro/adainfeasibility/1. In all cases, MDT designs and constructs ADA features in compliance with ADA requirements to the maximum extent feasible.



METHOD 26

CONTINUALLY INCORPORATE CONSTRUCTION DATA COLLECTION INTO THE ADA DATABASE

MDT monitors the installation of ADA features during construction and field personnel measure new features to determine conformance with the design plans. MDT performs quality control and quality assurance procedures on all newly collected information before outdated information is retired from the database.



METHOD 27

STRIVE TO MAINTAIN ACCESSIBILITY DURING CONSTRUCTION

ADA implementing regulations (28 CFR 35.133(b)) allow for isolated temporary interruptions in service or access due to maintenance or repairs. During construction activities, MDT strives to maintain accessibility in a manner comparable to conditions prior to construction and adheres to guidance within the MUTCD for work zone compliance.

Operations and Maintenance

The MDT Asset Strategy, Operations, & Maintenance Program Area is generally responsible for physical maintenance of MDT rights-of-way and facilities.

METHOD 28

IDENTIFY ADA ISSUES DURING REGULAR MAINTENANCE DUTIES

Over the course of a year, ADA features may become damaged or worn as a result of maintenance activities or due to normal wear and weathering. For example, blades used during wintertime snow removal may damage DWDs, and freeze/thaw cycles may cause pavement cracking resulting in trip hazards.

During the course of regular duties, MDT maintenance personnel identify and report any ADA issues and concerns to the appropriate MDT district and to the Civil Rights Bureau. The level of correction is determined and addressed through maintenance activities or through an improvement project as warranted.

METHOD 29

CONDUCT WINTER MAINTENANCE, COORDINATE WITH LOCAL JURISDICTIONS, AND ENFORCE MAINTENANCE AGREEMENTS

MDT is responsible for maintaining its rights-of-way in operable working condition throughout the year. During the winter, snow and ice buildup can limit the accessibility of an otherwise compliant pedestrian facility. MDT strives to regularly remove snow and ice and maintain ADA accessibility.

As noted in **Method 20**, MDT's practice is to enter into an agreement with a local jurisdiction to maintain sidewalks and pedestrian facilities on MDT routes. In other cases, local ordinances require adjacent landowners to maintain sidewalks. MDT coordinates with local jurisdictions to ensure maintenance responsibilities are defined.



3.4 BUILDING FACILITIES

In addition to its rights-of-way, MDT must also ensure its building facilities are ADA compliant, including existing and newly constructed features. Building facilities include district and headquarters office buildings, rest areas, airports, maintenance buildings, and scale sites.

METHOD 30

SCORE BUILDING FACILITIES TO IDENTIFY ADA NEEDS

Similar to its approach for right-of-way features, MDT used a composite system to score its building facilities and assign points based on demand and ADA compliance as part of its 2015 building facility inventory. The process is summarized in Figure 5 below.

A demand score for rest areas and MCS facilities was determined using annual average daily traffic (AADT) volumes. Similar to right-of-way features, a higher number of points were awarded for higher demand (indicated by AADT). Compliance scores were calculated by assigning a single point value to each non-compliant feature within the facility, including pedestrian access routes, curb ramps and blended transitions, DWDs, pedestrian crossings, parking and passenger loading zones, protruding objects, pedestrian ramps, stairways, handrails, doorways and entrances, tables and counters, drinking fountains, sinks, water closets, telephones, and signage.

Composite scores for building facilities were calculated by multiplying the demand score by the compliance score, with higher composite scores representing higher priorities. Facilities were then ranked according to type and degree of public access, with separate priority lists for rest areas (higher priority) and other facilities (lower priority). Only inventoried sites were included in the priority ranking. Building facility rankings have not been updated since 2015 due to resource constraints.

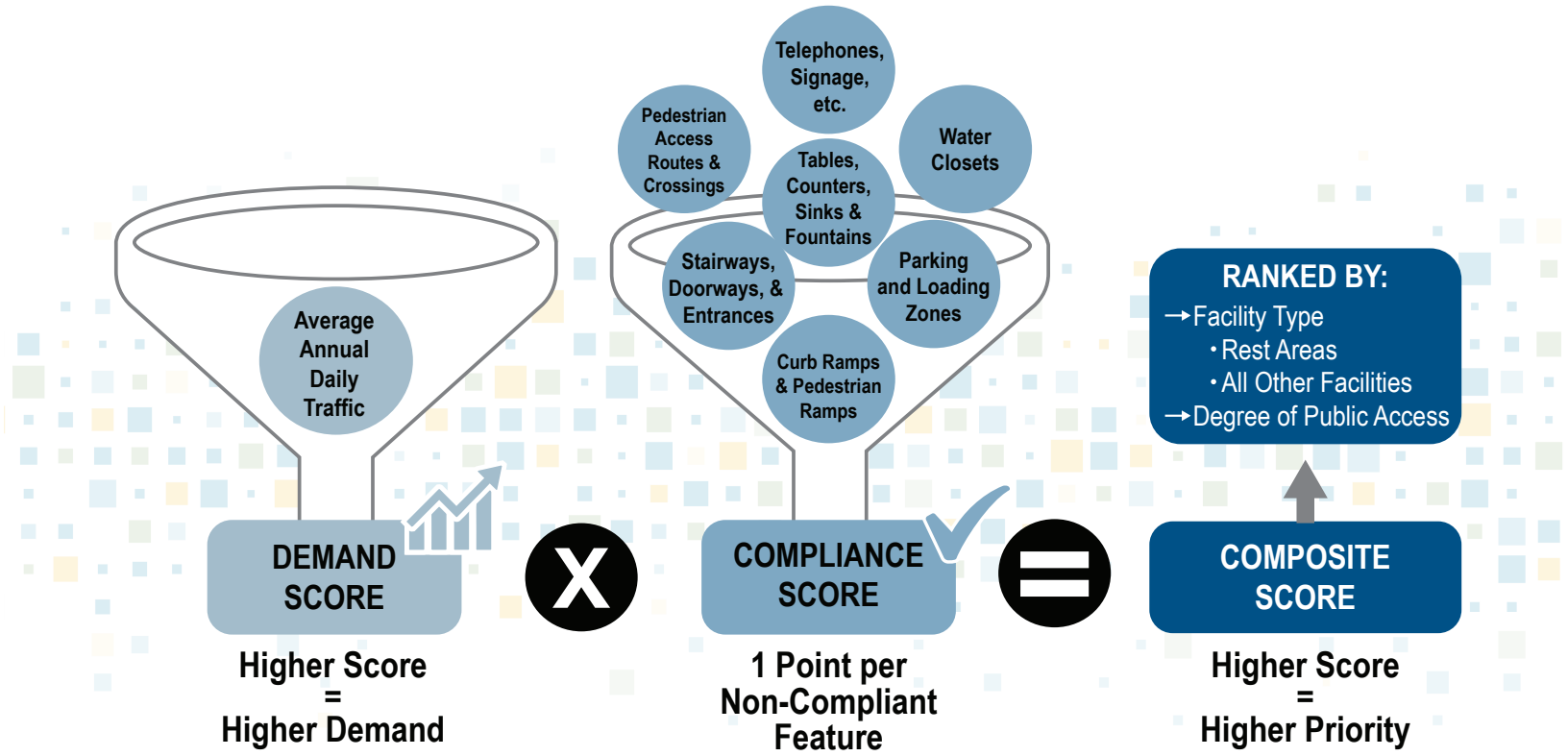


Figure 5: *Building Facility Scoring Process*



METHOD 31

PROVIDE ADA-COMPLIANT FEATURES WHEN DESIGNING, CONSTRUCTING, UPGRADING, AND MAINTAINING BUILDING FACILITIES

MDT provides ADA-compliant features as appropriate within the scope of work for each building facility project.

The MDT Asset Strategy, Operations, & Maintenance Program Area administers a long-range building program to address new construction or major rehabilitation of maintenance and office buildings, airports, and scale sites. MDT district staff and division staff identify and prioritize projects, and the Montana Department of Administration's Architecture and Engineering Division provides design and construction administration and oversight. Funding from the State Special Revenue Account is set aside each fiscal year for MDT's long-range building projects.

MDT also completes minor rehabilitation and repair projects to provide upgrades to interior spaces, including offices and restrooms; heating, ventilation, and air-conditioning systems; and exterior elements such as roofing, siding, and windows. These projects are addressed with the State Special Revenue funds as needs are identified.

Through a separate process, MDT develops rest area construction and rehabilitation projects under its Rest Area Program. As outlined in the *Montana Rest Area Plan*, projects are identified and prioritized according to health index scoring, network evaluation results, input from the Statewide Rest Area Prioritization Plan Committee and MDT Districts, and other factors. Projects are financed through dedicated rest area funding or via core program funding as nominated and agreed upon by the committee and the MDT District. Building facilities, parking areas, pedestrian routes, and signage are designed and constructed in compliance with ADA requirements.

METHOD 32

UPDATE FACILITY INVENTORY DATA

MDT conducted statewide inventory of its building facilities as part of the 2015 inventory effort. More than 150 building facilities were inventoried to determine ADA compliance. MDT maintains an internal database of those ADA facility features. MDT also maintains design information for all staff use, as available.

The building inventory and scoring results reflect conditions as of the 2015 effort and have not been systematically updated since that time. As funding and staffing resources allow, MDT intends to update the inventory as building facilities are constructed, rehabilitated, and repaired to inform future project needs.



3.5 SUMMARY OF METHODS

Table 1 provides a summary of MDT's ADA program methods.

Table 1: *ADA Program Methods*

CATEGORY		METHOD	
Administration		1	Employ an External ADA Coordinator.
		2	Conduct outreach with transportation officials.
		3	Coordinate with representatives of the disability community.
		4	Provide public notice about ADA requirements.
		5	Publish grievance procedures for resolution of ADA complaints.
		6	Provide a mechanism for tracking non-grievance ADA communication and informal inquiries.
		7	Provide written assurance guaranteeing non-discrimination.
		8	Ensure personnel are appropriately trained regarding ADA requirements.
Communications		9	Offer auxiliary aids and services to eliminate communication barriers.
		10	Inform the public of accessible services, activities, and facilities and share information about ADA projects.
Rights-of-Way	ADA Inventory	11	Maintain an inventory of existing ADA features.
		12	Consider ADA inventory system compatibility with other applicable data management systems.
		13	Score rights-of-way features to identify critical ADA needs.
	Project Identification	14	Identify projects using risk-based assessment of demand and compliance scoring, in combination with safety performance, proximity to programmed projects, local planning, and public and stakeholder feedback.
		15	Consider ADA compliance using an asset management method.
		16	Determine available funding sources.
		17	Identify level of ADA effort associated with project type.
		18	Consider project factors and opportunities to enhance ADA project delivery.
		19	Coordinate with partner agencies to identify local projects and future development activities.
		20	Establish and document maintenance responsibility.
	Design and Construction	21	Consider risk to determine appropriate project delivery method.
		22	Assign appropriate staff to design and review ADA documents.
		23	Design ADA improvements in accordance with applicable MDT design criteria and federal regulations.
		24	Design ADA features to allow construction flexibility.
		25	Apply documented process to determine technical infeasibility.
		26	Continually incorporate construction data collection into the ADA database.
		27	Strive to maintain accessibility during construction.
	Operations & Maintenance	28	Identify ADA issues during regular maintenance duties.
		29	Conduct winter maintenance, coordinate with local jurisdictions, and enforce maintenance agreements.
Building Facilities		30	Score building facilities to identify ADA needs.
		31	Provide ADA-compliant features when designing, constructing, upgrading, and maintaining building facilities.
		32	Update facility inventory data.

Chapter 4
PLAN AND SCHEDULE

MDT is committed to eliminating accessibility barriers for individuals with disabilities within its programs, rights-of-way, and building facilities. As required under 28 CFR 35.150(d)(3)(iii), MDT must specify a schedule for taking necessary steps to achieve ADA compliance. An implementation plan and schedule provide a timeline for addressing deficiencies in policies and procedures, augmenting missing or incomplete inventory data, and remediating physical barriers identified through inventory.



Given the number of physical barriers across the State of Montana, the associated cost for improvements, and available funding mechanisms, full compliance is anticipated to be achieved over a period of years. **Table 2** identifies planned ADA projects on MDT-maintained routes over the next five years (2027-2031). As described in **Figure 4**, ADA improvements may be programmed as stand-alone projects or incorporated into the scope of other highway projects. In addition to the 25 projects currently known to include ADA-related components, other programmed projects may also involve curb ramp, sidewalk, or path upgrades or other ADA improvements on MDT-maintained routes, depending on final project scope.

Table 2: *MDT Planned Projects with ADA Component(s)*

MDT DISTRICT	2027	2028	2029	2030	2031	TBD	Total Projects
Missoula	5	1	0	0	0	1	7
Butte	1	2	1	0	0	0	4
Great Falls	3	1	1	0	0	0	5
Glendive	0	0	0	0	3	1	4
Billings	2	1	2	0	0	0	5
Total Projects	**11**	**5**	**4**	**0**	**3**	**2**	**25**

Data reflects MDT's Active Projects as of September 2026, and is subject to change as projects are added, removed, or rescoped.

MDT will continue to update its curb ramp inventory and may consider expanding future inventory efforts to include sidewalks, shared-use paths, bus stops, and transit linkages as funding allows.

Every two years, MDT completes a program review and summarizes completed actions to include in the *MDT Fact Book*. This process enables MDT to track progress in removing accessibility barriers and achieving ADA compliance.

A summary of the progress MDT has made since implementation of the 2021 plan is contained in **Appendix E**.

Every five years, MDT also reviews the entire MDT *ADA Transition Plan* to ensure it accurately reflects the MDT ADA program methodology and procedures and updates it via limited amendment as necessary. The steps MDT takes to implement the *ADA Transition Plan* are shown in **Figure 6**.

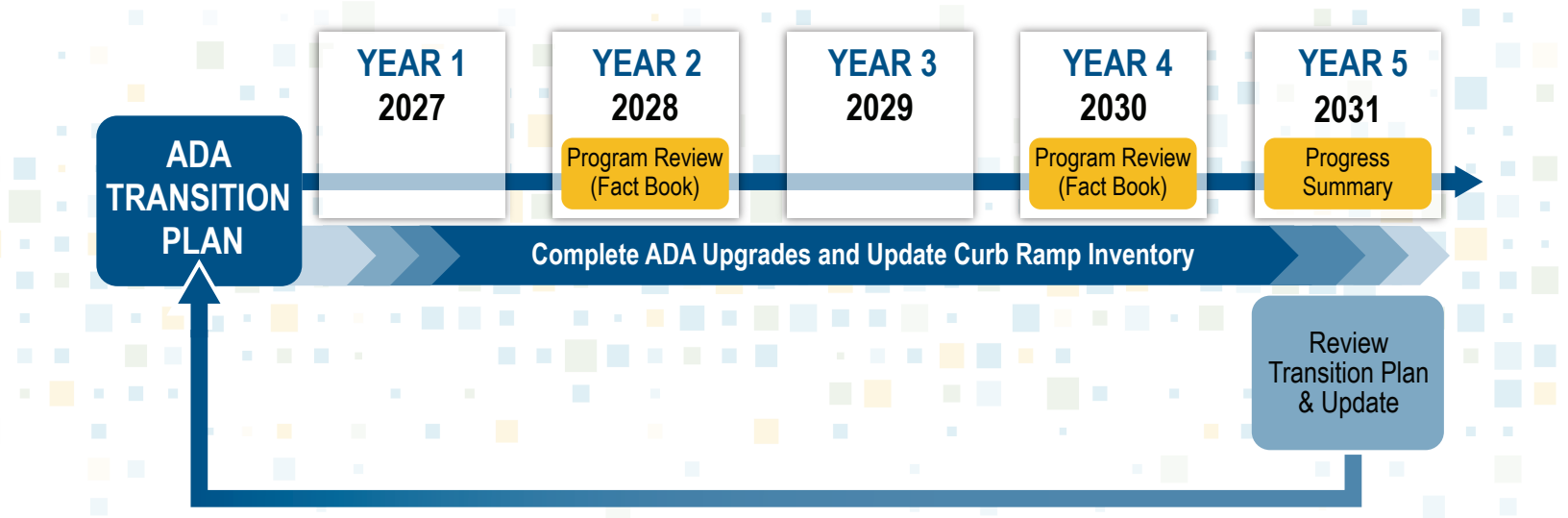


Figure 6: *ADA Transition Plan Implementation Process*



ADA TRANSITION PLAN UPDATE

Montana Department of Transportation

APPENDIX A:

Summary of MDT Responsibilities under Title II of the ADA

Summary of MDT Responsibilities under Title II of the ADA

Implementing Regulation	Responsibilities	Method / Section
28 CFR 35.105	**Self-Evaluation** • Evaluate current services, policies, and practices and make any necessary modifications to meet ADA requirements. • Provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the self-evaluation process by submitting comments. • Maintain a list of interested persons consulted, a description of areas examined and any problems identified, and a description of any modifications made.	Methods 3 & 11 Chapter 2
28 CFR 35.106	**Notice** • Make ADA information available to the public regarding applicability to MDT services, programs, and activities.	Method 4
28 CFR 35.107	**Responsible Employee / Grievance Procedures** • Designate a responsible employee to coordinate ADA efforts; provide the ADA coordinator's name, office address, and telephone number. • Adopt and publish grievance procedures providing for prompt and equitable resolution of complaints.	Methods 1 & 5
28 CFR 35.130 28 CFR 35.149	**General Prohibitions Against Discrimination** • Do not exclude disabled persons from participation in or deny benefits of MDT services, programs, or activities. • Do not discriminate on the basis of disability.	Method 7 Section 1.1
28 CFR 35.133	**Maintenance** • Maintain facilities and equipment required to be accessible to persons with disabilities in operable working condition.	Methods 20, 27, 28, & 29
28 CFR 35.150	**Existing Facilities** • Operate each service, program, or activity in a manner accessible to and usable by individuals with disabilities. • Alter existing facilities or construct new facilities as necessary to comply with ADA requirements. • Develop a transition plan outlining steps necessary to complete structural changes to facilities.	Methods 10, 28 & 31
28 CFR 35.151	**New Construction and Alterations** • Design, construct, and alter public facilities in a manner readily accessible to and usable by individuals with disabilities, unless structurally impracticable. • Provide curb ramps or other sloped areas at any intersection having curbs or other barriers to entry from a street level pedestrian walkway.	Methods 23, 25 & 31
28 CFR 35.160 28 CFR 35.161	**Communications/Telecommunications** • Ensure effective communications with disabled persons. • Provide appropriate auxiliary aids and services to afford disabled individuals an equal opportunity to participate in and enjoy the benefits of MDT services, programs, and activities.	Methods 3, 4, 9 & 10
28 CFR 35.163	**Information and Signage** • Provide information about the existence and location of accessible services, activities, and facilities. • Provide signage at all inaccessible building entrances directing users to an accessible entrance that is denoted with the international symbol for accessibility.	Methods 10 & 31
28 CFR 35.200	**Web Accessibility** • Ensure web content and mobile apps provided by MDT comply with success criteria and conformance requirements specified in Web Content Accessibility Guidelines (WCAG) 2.1. • *Note: The USDOJ Interim Final Rule for 28 CFR Part 35 published April 20, 2026, extended the compliance date for state and local government entities from April 24, 2026, to April 26, 2027.*	Methods 10 & 31

Note: Additional responsibilities detailed in 28 CFR Section 35 (e.g., related to employment discrimination) are not discussed in the MDT *ADA Transition Plan*.



ADA TRANSITION PLAN UPDATE

Montana Department of Transportation

APPENDIX B:

Public and Stakeholder Involvement

PENDING



ADA TRANSITION PLAN UPDATE

Montana Department of Transportation

APPENDIX C:

Scoring Report

APPENDIX C1: Scoring Report

APPENDIX C2: Curb Ramp Score Report by Boundary

ADA TRANSITION PLAN UPDATE

Montana Department of Transportation



APPENDIX C1:

Scoring Report

CURB RAMP SCORING PROCESS

MDT uses a composite system to score its right-of-way infrastructure. Points are assigned based on ADA demand and ADA compliance as described below.

DEMAND SCORES

Demand scores determine the likelihood of a pedestrian using a particular facility. The scores are calculated using the spatial data for structure and address points obtained from the Montana Structures Framework. This spatial data is used to create a heat map to show where higher density developments are located. Demand scores range from 1 to 10 with higher scores assigned to ramps in high density areas where pedestrian demand is likely to be higher, and lower scores assigned to ramps in areas with lower development densities. The structure types (i.e., demand generators) used in calculating the demand scores are listed in **Table 1**. An example of the demand heat map is shown in **Figure 1**.

Table 1: Demand Score Structure Types

Group	Description	Group	
Government	Government or Military Facility (Generic		Health or Medical Facility (Generic)
	Court House		Hospital / Medical Center
	Correctional Facility		Outpatient Clinic
	Military Facility		Nursing Home / Long Term Care
	State Capitol		Rehabilitation Center
	Local Government Facility		Day Care Facility
	State Government Facility		Public Health Office
	Federal Government Facility		Pharmacy
	Tribal Government Facility		Emergency Shelter
	City / Town Hall		Education Facility (Generic)
	Mail or Shipping Facility (Generic)		School (K-12)
	Post Office		College / University Facility
Private	Commercial or Retail Site (Generic)		Public Attraction or Landmark (Generic)
	Hotel / Motel		Park / Recreation Area
	Gas Station		Museum
	Grocery Store		Library
	Shopping Mall / Center		Church / Place of Worship
	Banking or Finance Facility		Sports Facility
	Office Building		Civic / Community Center
	Restaurant / Bar		Fairgrounds
Transportation	Transportation Facility (Generic)		
	Airport		
	Heliport		
	Parking Site		
	Rest Stop / Roadside Park		
	Border Crossing / Port of Entry		
	Railroad Facility		
	Harbor Facility		
	Bus Station / Dispatch Facility		

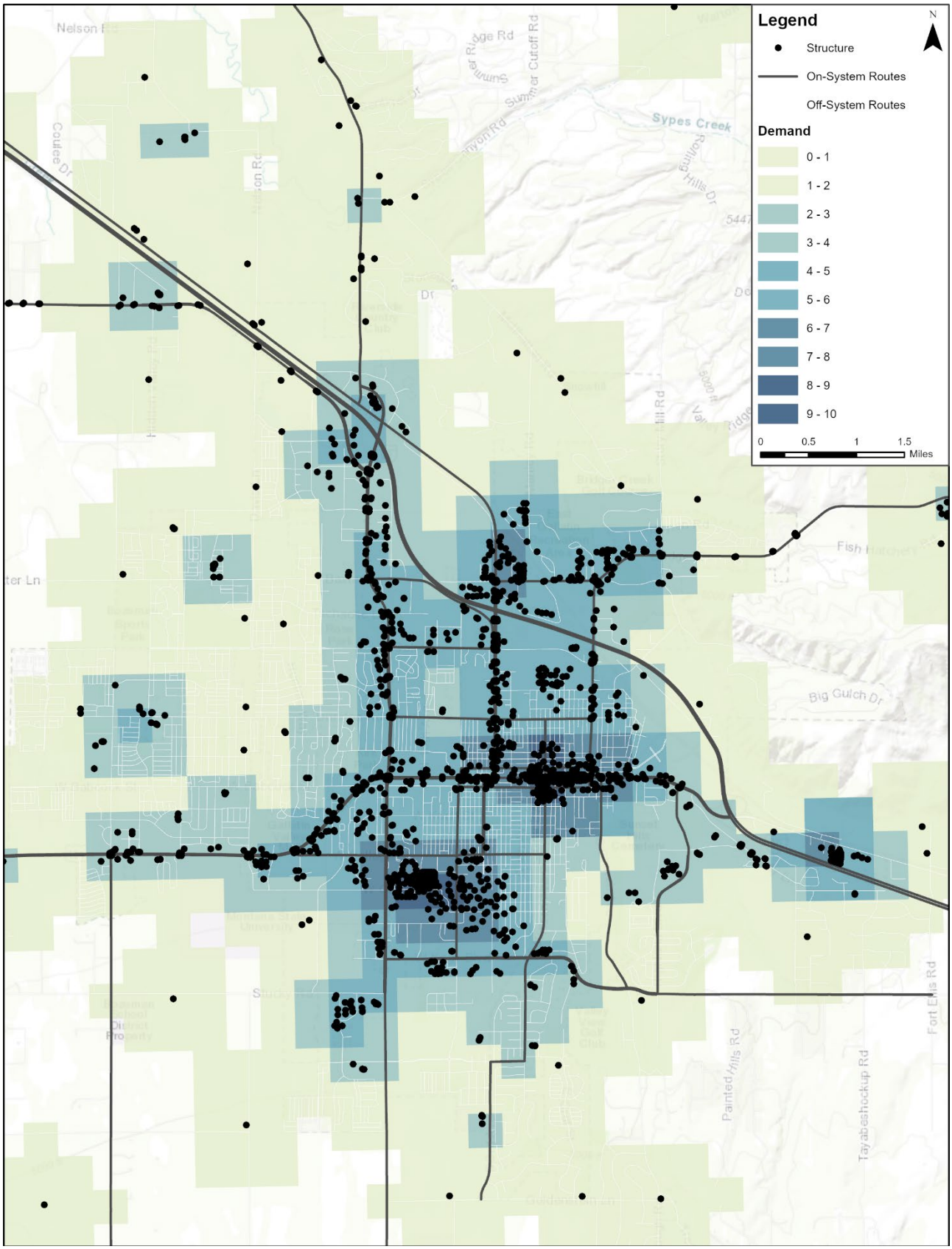


Figure 1: Example Demand Heat Map (Bozeman)

COMPLIANCE SCORES

Compliance scores assess whether curb ramps have been constructed to ADA standards. Compliance is evaluated based on 15 individual curb ramp elements. To provide an easy comparison, each ramp receives a score of 0 to 10 indicating the degree of compliance. Lower scores indicate features with greater compliance while higher scores indicate features with a higher number of non-compliant elements. A score of 10 is assigned to any location where a curb ramp is warranted but does not exist and a score of 0 is assigned to a fully compliant ramp. Each score is determined based on the number of scored elements for each individual ramp. Fields left empty generally are not considered in the compliance score, except if all element fields are empty the ramp automatically receives a compliance score of 10. **Equation 1** summarizes the compliance calculation and **Table 2** presents the elements considered in the compliance score.

Equation 1: $$Compliance = \frac{\sum Applicable\ Element\ Scores}{\#\ of\ Applicable\ ELements} * 10$$

Table 2: Compliance Score

#	Element	Standard	Element Score
1	Trip Hazard / Flush with Surface	Empty (Null)	Null
		0 – None (Flush)	0
		1 – 0.25" or less	0
		2 – 0.25" to 0.50"	1
		3 – 0.50" or greater	1
2	Ramp Slope	Empty (Null)	Null
		≤ 8.3%	0
		> 8.3%	1
3	Ramp Cross Slope	Empty (Null)	Null
		≤ 2.0%	0
		> 2.0%	1
4	Ramp Width	Empty (Null)	Null
		≥ 48"	0
		< 48"	1
5	Landing Length	Empty (Null)	Null
		≥ 48"	0
		< 48"	1
6	Landing Width	Empty (Null)	Null
		≥ 48"	0
		< 48"	1
7	Landing Slope	Empty (Null)	Null
		≤ 2.0%	0
		> 2.0%	1
9	Flare Slope Left	Empty (Null)	Null
		≤ 10.0%	0
		> 10.0%	1
10	Flare Slope Right	Empty (Null)	Null
		≤ 10.0%	0
		> 10.0%	1
11	Gutter Slope	Empty (Null)	Null
		≤ 5.0%	0
		> 5.0%	1
12	Detectable Warning Device	Empty (Null)	1
		Yes	0
		No	1
13	Push Button Height	Empty (Null)	Null
		≥ 15" or ≤ 48"	0
		< 15" or > 48"	1
14	Push Button Clear Space (Length and Width)	Either Field is Empty (Null)	Null
		Greater than 48" x 30"	0
		Less than 48" x 30"	1
15	Push Button Slope	Empty (Null)	Null
		≤ 2.0%	0
		> 2.0%	1
Ramp is Undeveloped / Unconstructed OR All Fields (Except Ramp Layout) Empty			10

Note: Null indicates an individual element that does not contribute to the compliance score.

COMPOSITE SCORES

Composite scores help identify and categorize locations for barrier removal. MDT uses a composite scoring system calculated by multiplying the demand and compliance scores for each curb ramp. This methodology returns a minimum score of 0, indicating a fully compliant ramp (regardless of location or demand), and maximum score of 100, indicating an undeveloped but warranted ramp, or a fully non-compliant ramp in a location with high pedestrian demand.

AGGREGATE COMPOSITE SCORES

For comparison and reporting purposes, curb ramp composite scores are summarized according to four administrative boundary types: MDT districts, counties, urban areas, and communities. At the end of each year, MDT produces an annual update report summarizing completed actions and describing any changed conditions. Included in the report is an output of the scoring results to help MDT track progress in removing accessibility barriers and achieving ADA compliance. The scoring report, found at the end of this appendix, contains statistics summarizing the compliance, composite, and element scores for the curb ramps across the state summarized by the four administrative boundaries discussed previously.

The curb ramp scoring process is illustrated in **Figure 2** below. The possible ranges of demand, compliance, and composite scores are illustrated in **Figure 3**.

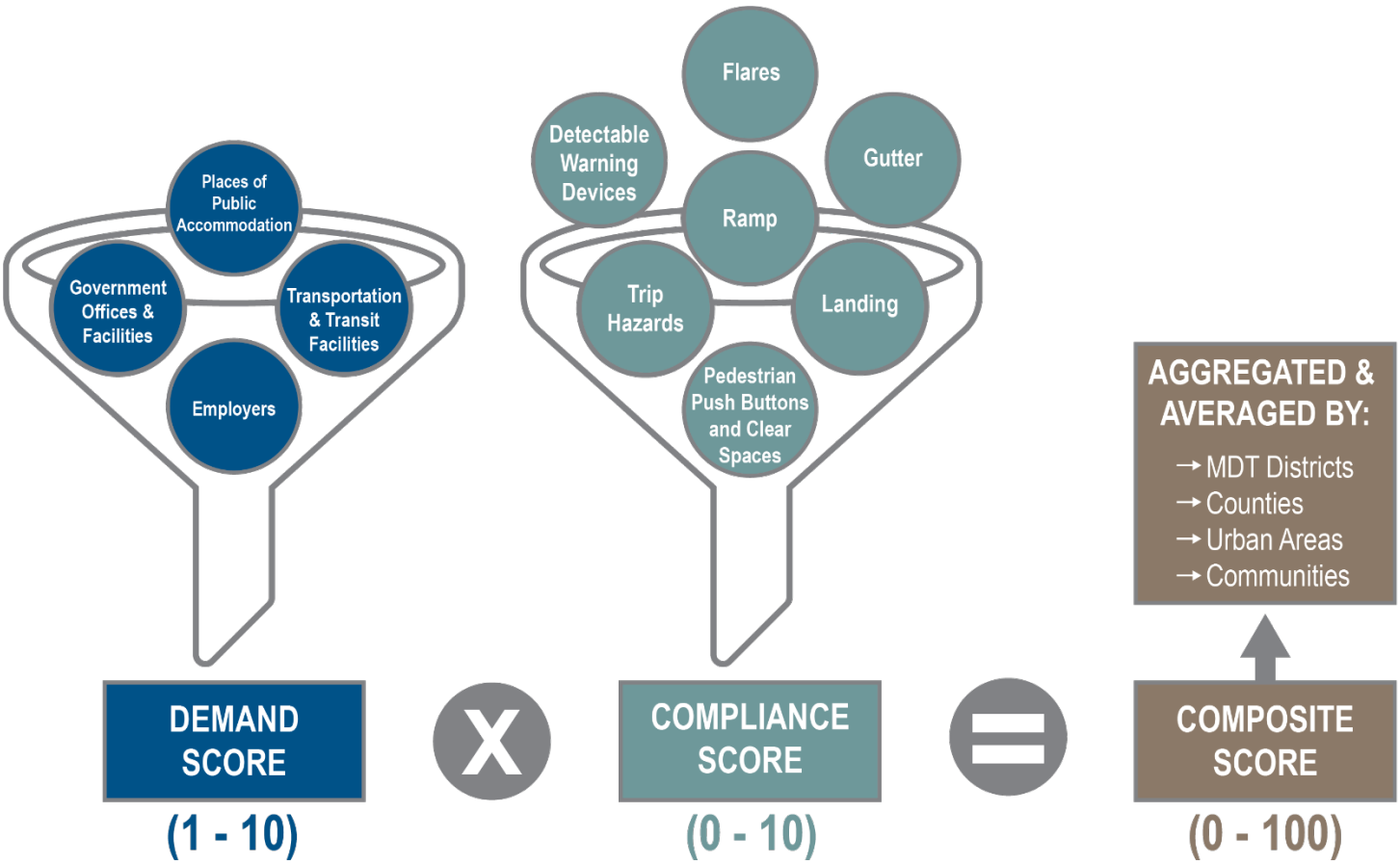


Figure 2: Curb Ramp Scoring Process

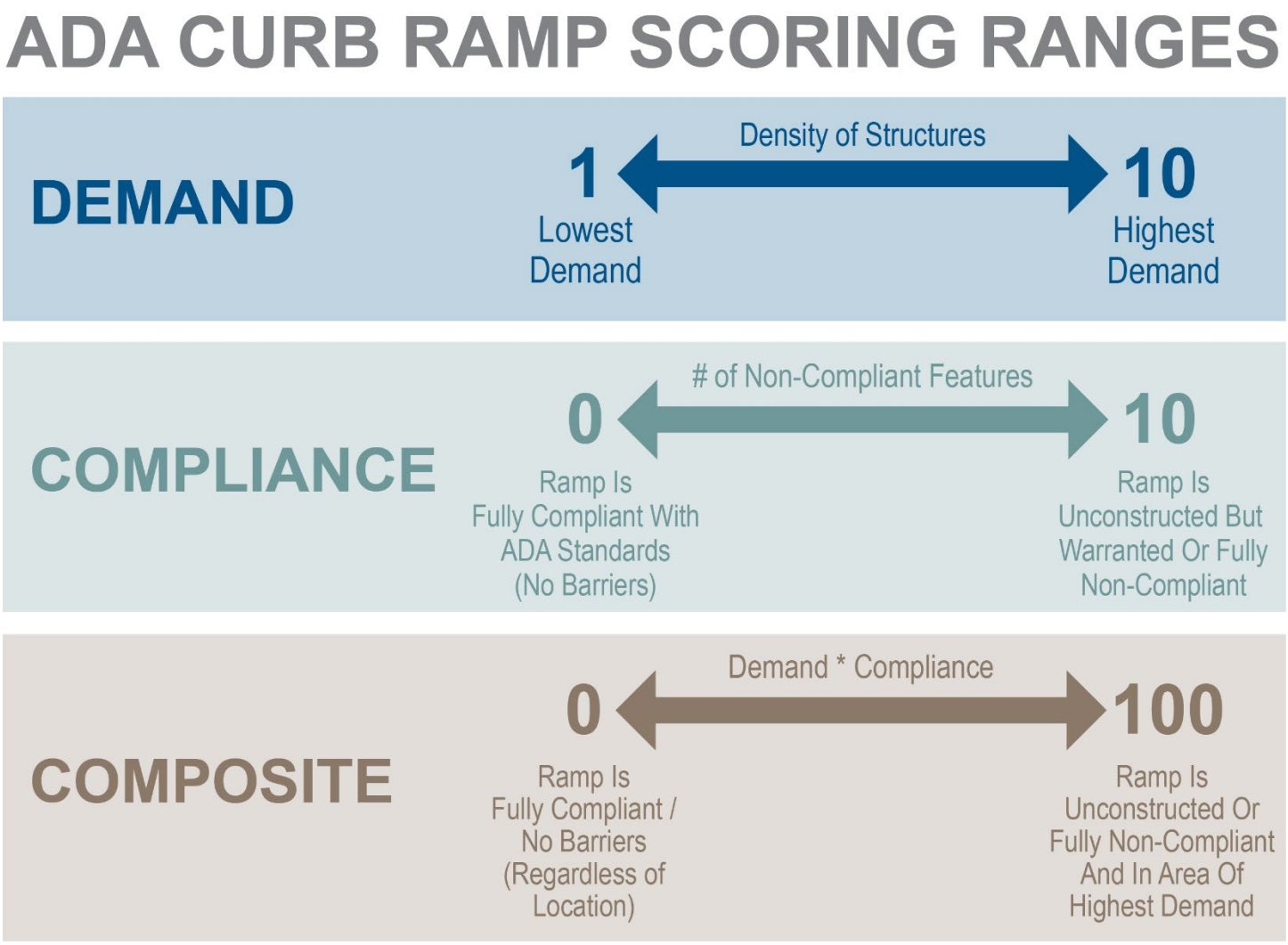


Figure 3: Possible Scoring Ranges

COMPOSITE SCORE VISUALIZATIONS

To help MDT make transportation investment decisions, the curb ramp composite scores are compiled to create heat maps showing where higher densities of non-compliant curb ramps and curb ramps with high composite scores are located. The outputs are overlaid with MDT's Tentative Construction Projects (TCP) for the current five-year timeframe. This allows MDT to view hot spots of non-compliant curb ramps at or near project sites. This is intended to help MDT with the decision-making process during the project scoping phase.

In some situations involving improvements to existing infrastructure, it is infeasible to fully comply with ADA requirements within the scope limitations of the project. In these situations, compliance must be provided to the maximum extent feasible. Technical infeasibility is not factored into compliance scores. Instead, visualizations are applied to the data to help MDT identify locations where existing conditions have made a particular curb ramp technically infeasible.

Examples of these visualizations are displayed in **Figures 4 through 6**.

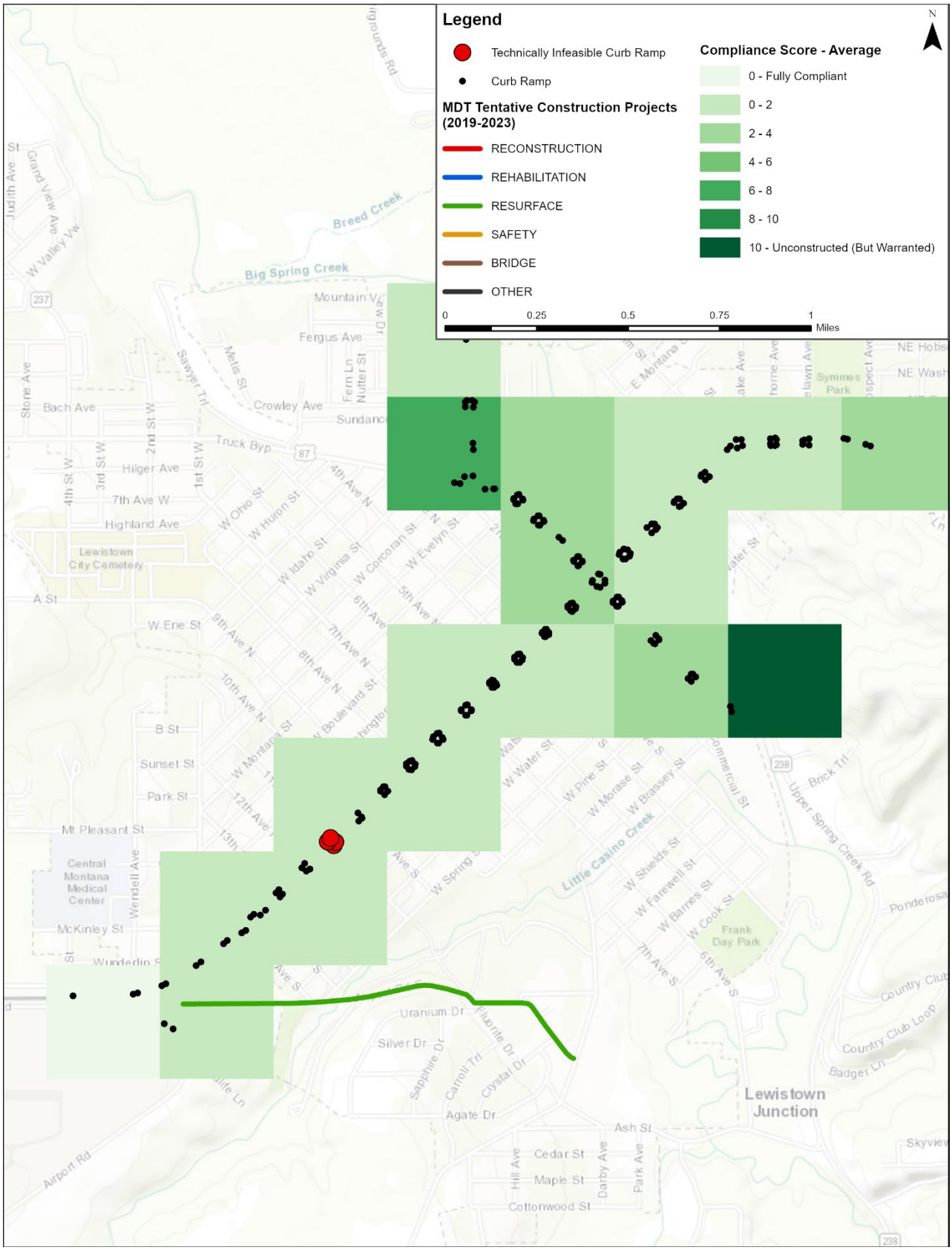


Figure 4: Example Compliance Score Average and Technical Infeasibility (Lewistown)

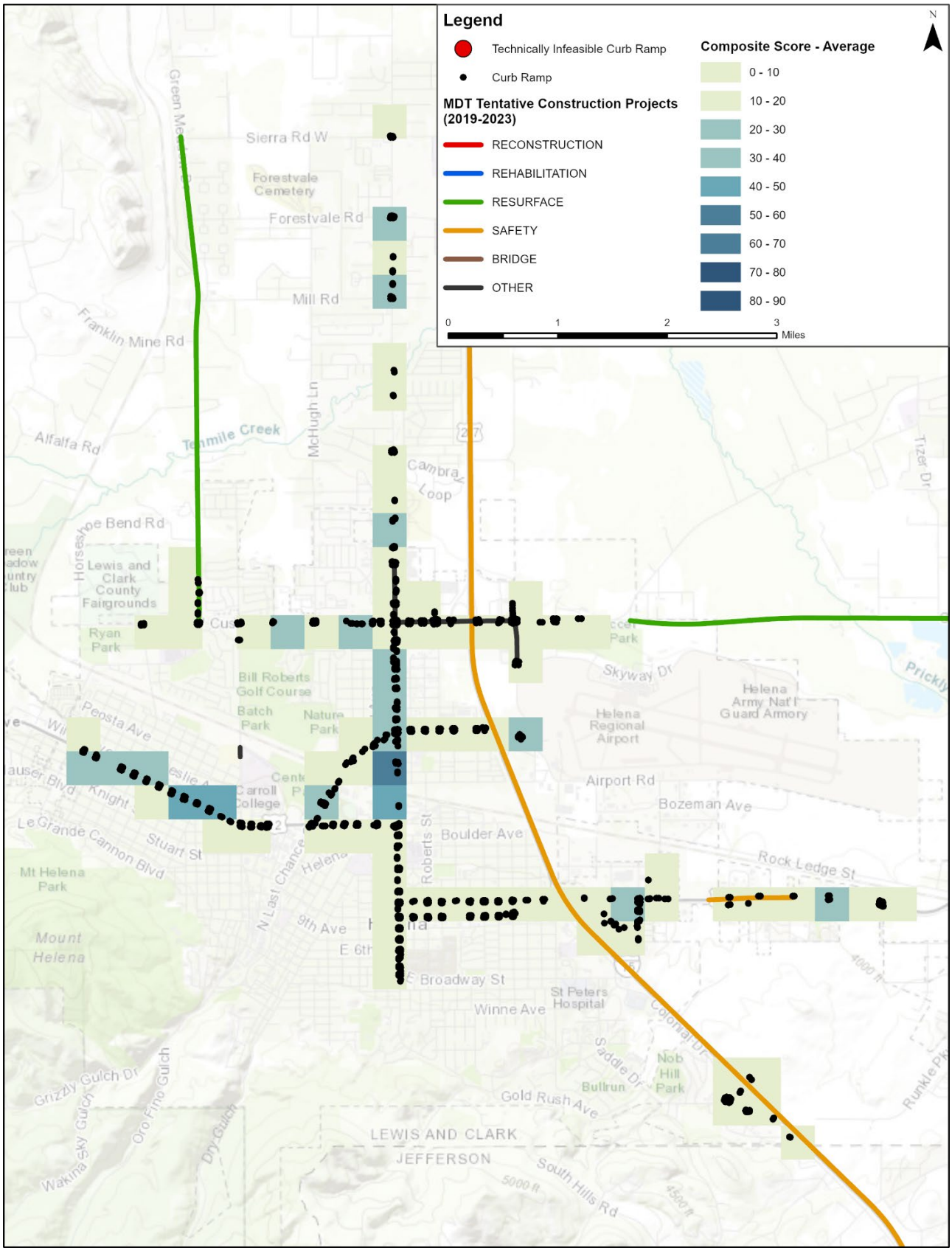


Figure 5: Example Composite Score Average (Helena)

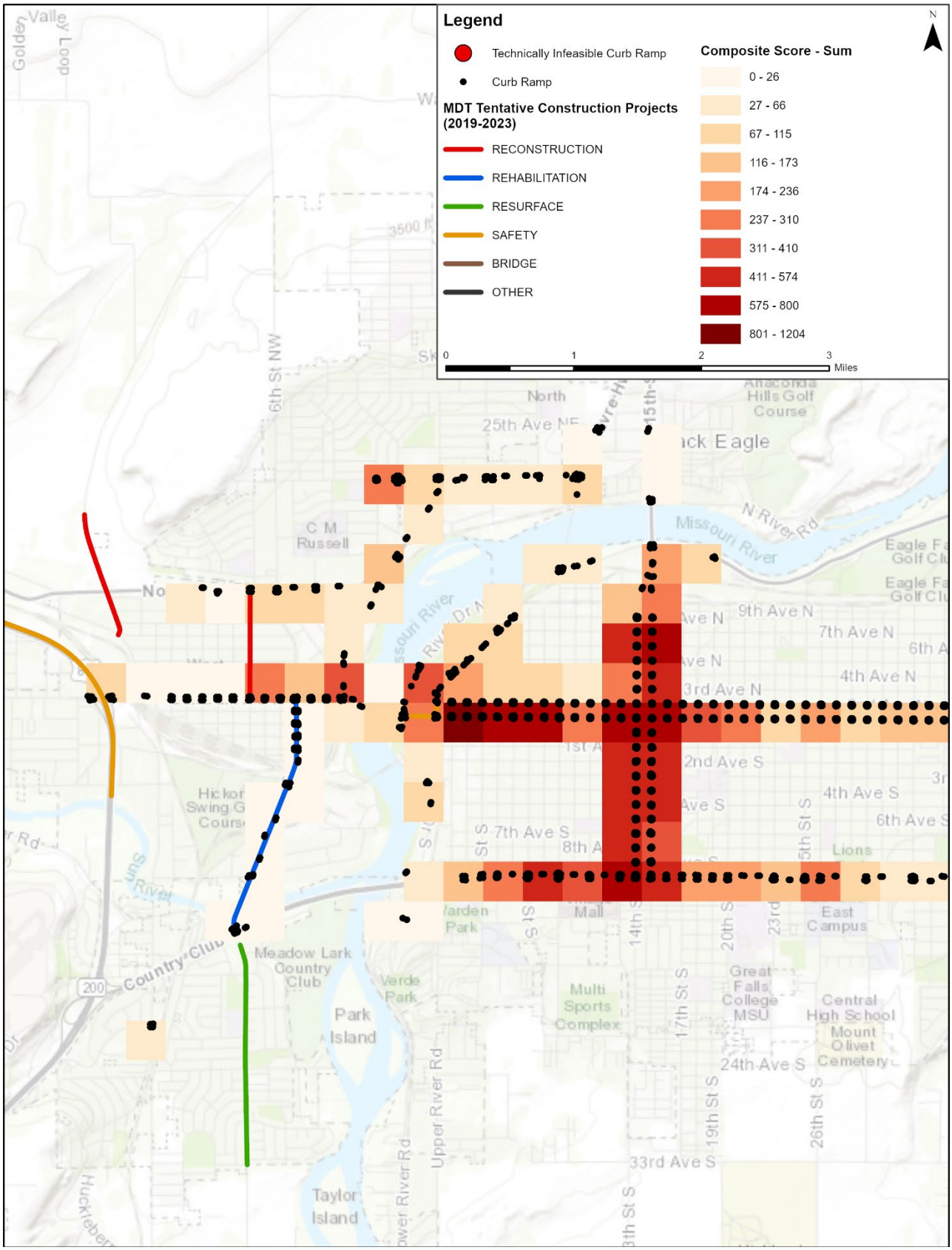


Figure 6: Example Composite Score Sum (Great Falls)

ADA TRANSITION PLAN UPDATE

Montana Department of Transportation



APPENDIX C2:

Curb Ramp Score Report by Boundary

Curb Ramp Scores By MDT Financial District (As of September 14, 2026)

Note: Demand scores calcuated with Structures data from MSDI dated 9-1-26

MDT Financial Districts	Number of Ramps	Average Compliance Score	Average Composite Score	Sum Composite Score
BILLINGS	2,400	4.58	16.55	26847.00
BUTTE	3,195	4.05	16.82	42924.00
GLENDIVE	1,810	5.04	18.90	31157.00
GREAT FALLS	3,713	4.39	17.04	50119.00
MISSOULA	4,676	4.41	19.94	49857.00
TOTAL	**15,794**	**4.49**	**17.85**	**200904.00**

**Scores for individual curb ramp elements are available upon request.*

Curb Ramp Scores By County (As of September 14, 2026)

Note: Demand scores calcuated with Structures data from MSDI dated 9-1-26

County	Number of Ramps	Average Compliance Score	Average Composite Score	Sum Composite Score
BEAVERHEAD	229	6.36	26.53	2309.00
BIG HORN	195	4.50	19.94	2890.00
BLAINE	54	5.64	24.41	1731.00
BROADWATER	101	5.99	9.42	898.00
CARBON	254	4.60	17.32	2931.00
CASCADE	1,599	4.45	11.73	21625.00
CHOUTEAU	46	7.02	37.11	1450.00
CUSTER	259	2.51	14.59	5390.00
DANIELS	65	8.03	34.79	1855.00
DAWSON	142	6.80	16.02	886.00
DEER LODGE	295	1.67	8.22	2425.00
FALLON	90	4.99	23.01	1935.00
FERGUS	308	4.11	10.89	2201.00
FLATHEAD	1,270	2.35	10.56	16745.00
GALLATIN	1,308	3.24	16.79	20938.00
GARFIELD	43	3.21	16.65	716.00
GLACIER	211	2.20	9.08	2041.00
GOLDEN VALLEY	43	3.43	17.36	820.00
GRANITE	74	9.05	49.21	3827.00
HILL	322	2.44	10.60	3394.00
JEFFERSON	216	2.76	10.51	2151.00
JUDITH BASIN	90	5.85	15.51	989.00
LAKE	394	4.46	18.54	6037.00
LEWIS AND CLARK	1,006	4.04	14.91	14233.00
LIBERTY	25	3.33	8.06	295.00
LINCOLN	275	4.49	19.61	4594.00
MADISON	180	4.56	21.32	3447.00
MCCONE	79	7.22	29.62	2012.00
MEAGHER	45	5.33	33.58	1511.00
MINERAL	95	5.43	28.69	2485.00
MISSOULA	1,799	2.48	2.53	4428.00
MUSSELSHELL	140	5.33	12.87	608.00
PARK	209	2.71	13.78	2454.00
PETROLEUM	31	2.06	7.06	219.00
PHILLIPS	93	4.87	17.93	2125.00
PONDERA	200	3.47	15.39	1884.00
POWDER RIVER	37	4.35	14.29	907.00
POWELL	128	4.90	12.35	1603.00
PRAIRIE	20	5.88	5.34	203.00

County	Number of Ramps	Average Compliance Score	Average Composite Score	Sum Composite Score
RAVALLI	545	4.33	23.55	8195.00
RICHLAND	275	4.16	14.37	3887.00
ROOSEVELT	310	3.62	17.21	4437.00
ROSEBUD	92	4.78	16.91	1466.00
SANDERS	96	5.44	24.60	1943.00
SHERIDAN	80	4.71	10.16	1044.00
SILVER BOW	612	5.68	10.06	6791.00
STILLWATER	127	4.07	21.14	2671.00
SWEET GRASS	92	1.20	6.91	636.00
TETON	153	5.89	19.09	2732.00
TOOLE	97	3.65	20.99	734.00
TREASURE	3	10.00	36.00	116.00
VALLEY	192	6.50	32.91	3721.00
WHEATLAND	109	4.66	16.74	1257.00
WIBAUX	33	3.39	17.36	573.00
YELLOWSTONE	1,008	3.63	15.10	11509.00
TOTAL	**15,794**	**4.58**	**17.99**	**200904.00**

**Scores for individual curb ramp elements are available upon request.*

Curb Ramp Scores By Urban Area (As of September 14, 2026)

Note: Demand scores calcuated with Structures data from MSDI dated 9-1-26

Urban Area	Number of Ramps	Average Compliance Score	Average Composite Score	Sum Composite Score
Anaconda	295	1.67	8.22	2425.00
Belgrade	202	3.17	20.12	5160.00
Billings	912	2.01	10.70	9848.00
Bozeman	591	2.73	7.34	5294.00
Butte	603	2.39	11.13	6710.00
Columbia Falls	161	3.23	13.20	2303.00
Glendive	136	4.35	7.05	716.00
Great Falls	1,453	2.92	11.18	20293.00
Hamilton	160	5.43	35.94	3716.00
Havre	288	2.95	12.22	3144.00
Helena	946	3.17	13.01	12997.00
Kalispell	740	3.07	14.07	10090.00
Laurel	81	3.72	13.48	1254.00
Lewistown	221	2.33	6.50	1118.00
Livingston	112	2.42	14.20	1473.00
Miles City	257	2.94	17.13	5371.00
Missoula	1,609	1.81	1.73	3647.00
Polson	143	2.89	14.96	2385.00
Sidney	206	3.95	16.01	3568.00
Whitefish	198	1.38	9.51	2570.00
TOTAL	**9,314**	**2.93**	**12.89**	**104082.00**

**Scores for individual curb ramp elements are available upon request.*

Curb Ramp Scores By Community (As of September 14, 2026)

Note: Demand scores calcuated with Structures data from MSDI dated 9-1-26

Community	Number of Ramps	Average Compliance Score	Average Composite Score	Sum Composite Score
Alberton	22	9.55	47.73	1050.00
Anaconda-Deer Lodge	295	1.67	8.22	2425.00
Bainville	23	3.65	12.65	291.00
Baker	75	4.33	20.75	1556.00
Bearcreek	12	9.33	17.17	206.00
Belgrade	165	3.83	28.68	4732.00
Belt	20	5.20	24.85	497.00
Big Sandy	6	7.00	45.83	275.00
Big Timber	92	1.20	6.91	636.00
Billings	869	1.48	10.81	9393.00
Boulder	82	2.02	11.41	936.00
Bozeman	577	1.55	9.04	5215.00
Bridger	26	1.67	10.15	264.00
Broadus	33	5.37	27.33	902.00
Butte-Silver Bow	612	5.68	10.06	6791.00
Cascade	66	0.95	4.03	266.00
Chester	24	3.33	12.13	291.00
Chinook	20	4.63	28.85	577.00
Choteau	108	3.36	17.55	1895.00
Circle	77	4.43	25.25	1944.00
Clyde Park	19	4.18	18.68	355.00
Colstrip	9	5.63	15.44	139.00
Columbia Falls	124	2.52	15.24	1890.00
Columbus	59	3.99	22.75	1342.00
Conrad	159	1.15	7.63	1213.00
Culbertson	116	1.49	7.56	877.00
Cut Bank	92	0.90	4.45	409.00
Darby	24	3.61	18.08	434.00
Deer Lodge	110	3.24	12.59	1385.00
Denton	40	1.98	6.40	256.00
Dillon	187	1.32	6.20	1160.00
Dodson	11	2.42	7.91	87.00
Drummond	10	8.73	56.40	564.00
Dutton	18	6.48	25.83	465.00
East Helena	70	3.27	13.93	975.00
Ennis	35	2.76	17.66	618.00
Eureka	31	5.35	34.55	1071.00
Fairfield	24	3.72	13.00	312.00
Fairview	66	0.90	3.85	254.00

Community	Number of Ramps	Average Compliance Score	Average Composite Score	Sum Composite Score
Flaxville	7	10.00	46.71	327.00
Forsyth	31	4.24	24.16	749.00
Fort Benton	38	4.05	29.00	1102.00
Froid	16	8.88	38.06	609.00
Fromberg	5	6.27	33.00	165.00
Glasgow	136	1.32	10.47	1424.00
Glendive	130	1.58	5.09	662.00
Great Falls	1,434	2.08	14.04	20135.00
Hamilton	146	2.76	20.53	2997.00
Hardin	136	1.61	10.01	1362.00
Harlem	26	9.03	44.38	1154.00
Harlowton	70	1.42	8.57	600.00
Havre	271	2.13	10.74	2911.00
Helena	756	2.43	14.17	10710.00
Hobson	26	5.23	13.96	363.00
Hot Springs	14	7.05	33.36	467.00
Hysham	1	10.00	28.00	28.00
Joliet	29	2.83	12.97	376.00
Jordan	43	3.21	16.65	716.00
Judith Gap	29	3.49	12.66	367.00
Kalispell	554	1.25	6.71	7246.00
Laurel	76	2.25	15.76	1198.00
Lavina	18	1.44	6.89	124.00
Lewistown	216	1.46	4.99	1078.00
Libby	131	2.20	14.36	1881.00
Lima	2	10.00	47.00	94.00
Livingston	103	2.10	12.95	1334.00
Lodge Grass	22	4.45	21.00	462.00
Malta	54	4.26	25.72	1389.00
Manhattan	72	1.52	8.47	610.00
Miles City	233	3.59	21.76	5071.00
Missoula	1,442	1.52	2.41	3470.00
Nashua	14	8.38	35.93	503.00
Neihart	29	10.00	12.48	362.00
Opheim	13	7.69	42.38	551.00
Philipsburg	58	8.40	52.22	3029.00
Plains	20	7.03	40.90	818.00
Plentywood	50	3.87	19.66	983.00
Plevna	15	5.64	25.27	379.00
Polson	125	2.62	17.26	2157.00
Poplar	30	0.29	1.43	43.00
Red Lodge	150	1.22	7.97	1195.00

Community	Number of Ramps	Average Compliance Score	Average Composite Score	Sum Composite Score
Richey	4	8.50	35.00	140.00
Ronan	96	3.45	21.59	2073.00
Roundup	132	0.65	3.24	428.00
Ryegate	25	5.41	27.84	696.00
Saco	20	7.20	28.70	574.00
Scobey	56	4.10	26.16	1465.00
Shelby	95	0.97	6.99	664.00
Sheridan	37	0.81	4.38	162.00
Sidney	204	3.06	12.18	3531.00
St. Ignatius	12	10.00	32.92	395.00
Stanford	55	2.32	7.24	398.00
Stevensville	50	3.13	17.60	880.00
Superior	39	4.31	26.26	1024.00
Terry	19	1.75	10.68	203.00
Thompson Falls	40	1.20	7.03	281.00
Three Forks	84	4.40	29.20	2453.00
Townsend	97	1.97	8.85	858.00
Troy	41	3.90	15.66	642.00
Twin Bridges	39	4.89	27.69	1080.00
Valier	27	1.58	10.11	273.00
Virginia City	23	8.84	44.70	1028.00
West Yellowstone	66	2.79	21.11	1393.00
Westby	26	0.26	0.81	21.00
White Sulphur Springs	45	5.33	33.58	1511.00
Whitefish	197	2.10	13.02	2564.00
Whitehall	81	1.64	5.31	430.00
Wibaux	33	3.39	17.36	573.00
Winifred	23	3.91	14.87	342.00
Winnett	31	2.06	7.06	219.00
Wolf Point	58	5.30	33.57	1947.00
TOTAL	**12,934**	**3.91**	**18.99**	**163397.00**

**Scores for individual curb ramp elements are available upon request.*



ADA TRANSITION PLAN UPDATE

Montana Department of Transportation

APPENDIX D:

ADA Statement of Technical Infeasibility

MDT-CIV-025 12/15

Montana Department of Transportation
ADA Statement of Technical Infeasibility

Send completed form to MDT External ADA Specialist

Route	Project	UPN
Intersection, Quadrant, & Coordinates		

Describe reason full compliance is infeasible:

- ☐ **Structural** (Bridge beams, buildings, basements, foundations, vaults, etc.)
- ☐ **Utilities** (Project scope would not otherwise require utility relocation and relocation is infeasible.)
- ☐ **Steep Existing Grades**
- ☐ **Right of Way** (Project scope would not otherwise require R/W or R/W is infeasible.)
- ☐ **Other** (See attached.)

Attached Files:

	Yes	No	Curb Ramp Element(s)	Desired	Limits	Record Maximum Measured / Designed Value
A	○	○	Ramp Slope	5%	8.3% max	
B	○	○	Ramp Width	5 ft.	4 ft. min	
C	○	○	Ramp Cross Slope	1.5%	2% max	
D	○	○	Ramp Flares LT/RT	8.3%	10% max	
E	○	○	Landing Dimensions	5' x 5'	4' x 4' min (If not constrained)	
F	○	○	Landing Slope	1.5%	2% max (parallel and perpendicular to path of travel)	
G	○	○	Grade Break	Non-rounded & 90° to direction travel		
H	○	○	Detectable Warning	Required per standard		
I	○	○	Gutter Pan	5% max with flush transition		

Completed By	**Title**	**Date**
Approved By	External ADA Specialist **Title**	**Date**
Disapproved By	**Title**	**Date**

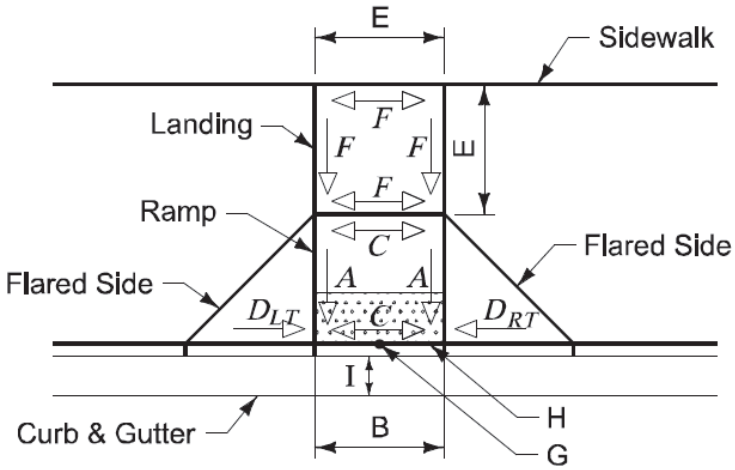
Montana Department of Transportation
ADA Statement of Technical Infeasibility

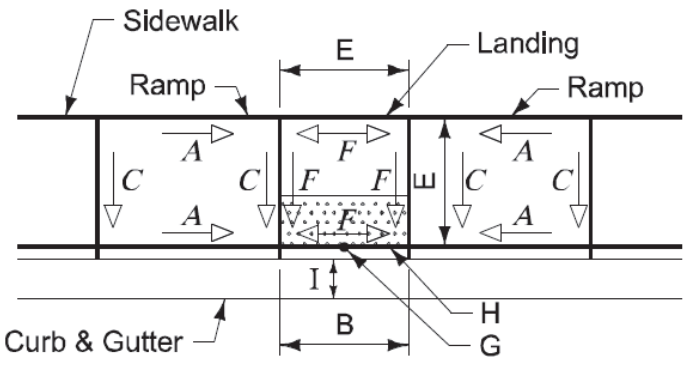
Send completed form to MDT External ADA Specialist

Images

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Description:







ADA TRANSITION PLAN UPDATE

Montana Department of Transportation

APPENDIX E:

Progress Report

PROGRESS SUMMARY

1.0 Introduction

Since the 2021 *ADA Transition Plan* was completed, MDT has continued to upgrade its existing infrastructure and remove barriers to accessibility. Over the past five years, each of the five MDT districts has completed multiple ADA upgrade projects, either as stand-alone projects or as part of other highway improvements. Through 57 total projects, MDT has provided 1,303 ADA-compliant curb ramps, 325 accessible pedestrian signals (APS), and the approximate equivalent of 17.5 miles, or 92,000 feet, of new sidewalk. These upgrades were implemented in 41 Montana communities across all five MDT districts.

Figure 1 shows the projects MDT has implemented across the state since 2021. Only projects that were completed or under construction from 2022 to the time of this update (2026) are included in the figure. Planned projects are not included.

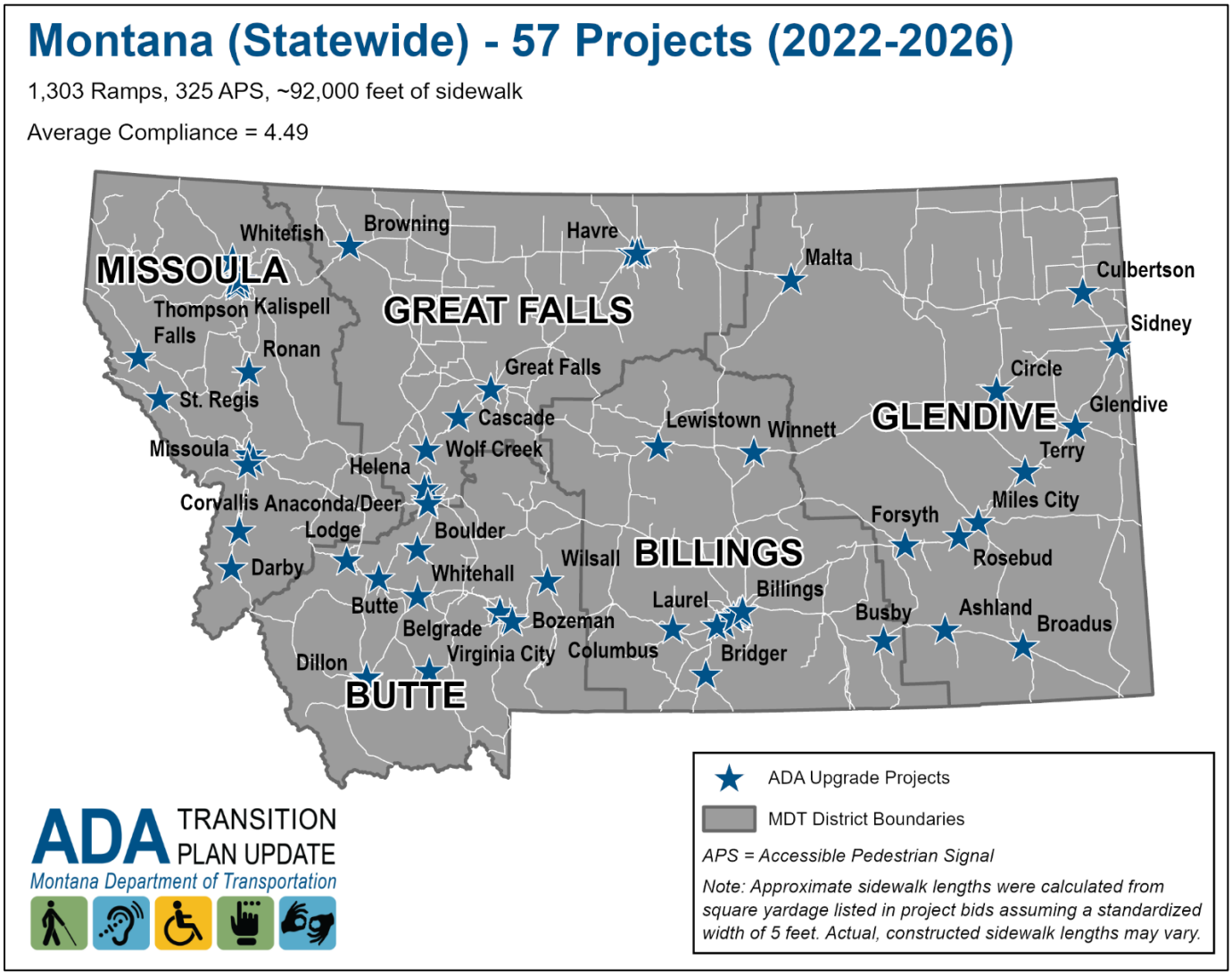


Figure 1: ADA Upgrades Constructed from 2022 to 2026

2.0 Recently Completed Projects

The following sections show the ADA upgrade projects broken down by each of MDT's five administrative districts. Callouts for each project summarize the total number of curb ramps, APS, and approximate linear feet equivalents of sidewalk included in the projects. Approximate sidewalk lengths were calculated according to the square yardage included in project bids. To provide an approximate equivalent length, a standardized sidewalk width of five feet was assumed. Actual constructed lengths may vary.

2.1. District 1 – Missoula

As shown in **Figure 2**, 13 projects were completed in the Missoula District from 2022 to 2026. With those projects, MDT successfully implemented 148 ramps, 26 APS, and approximately 17,300 feet of new sidewalk across 8 communities. As of September 2026, the average curb ramp compliance score in the Missoula District is 4.41.

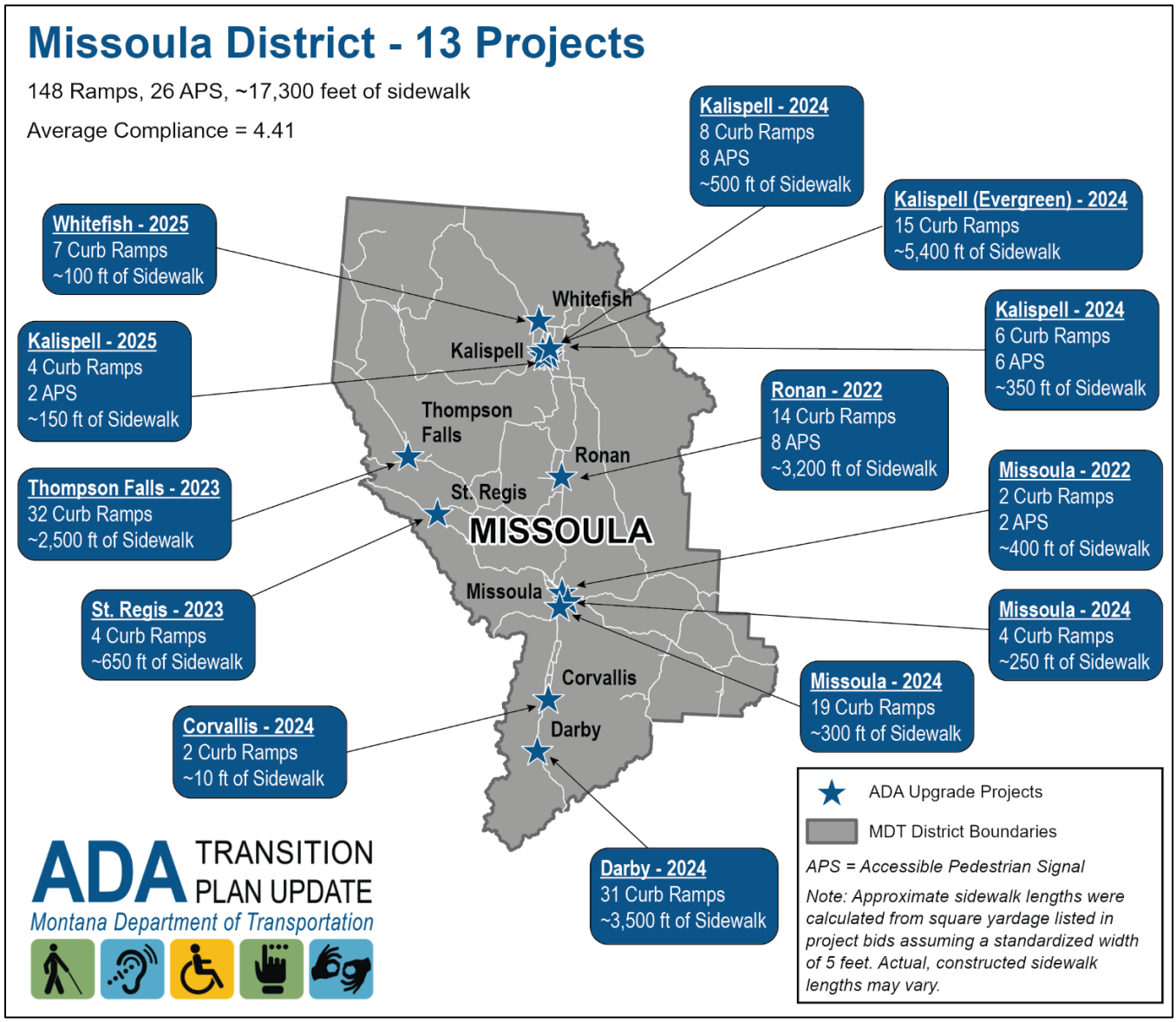


Figure 2: ADA Upgrades Completed in MDT District 1 (Missoula)

2.2. District 2 – Butte

Figure 3 represents the 13 projects completed in the Butte District over the past five years. Those projects resulted in 386 new curb ramps, 148 APS, and approximately 22,250 feet of new sidewalk across 11 Montana communities. As of September 2026, the average curb ramp compliance score in the Butte District is 4.05.

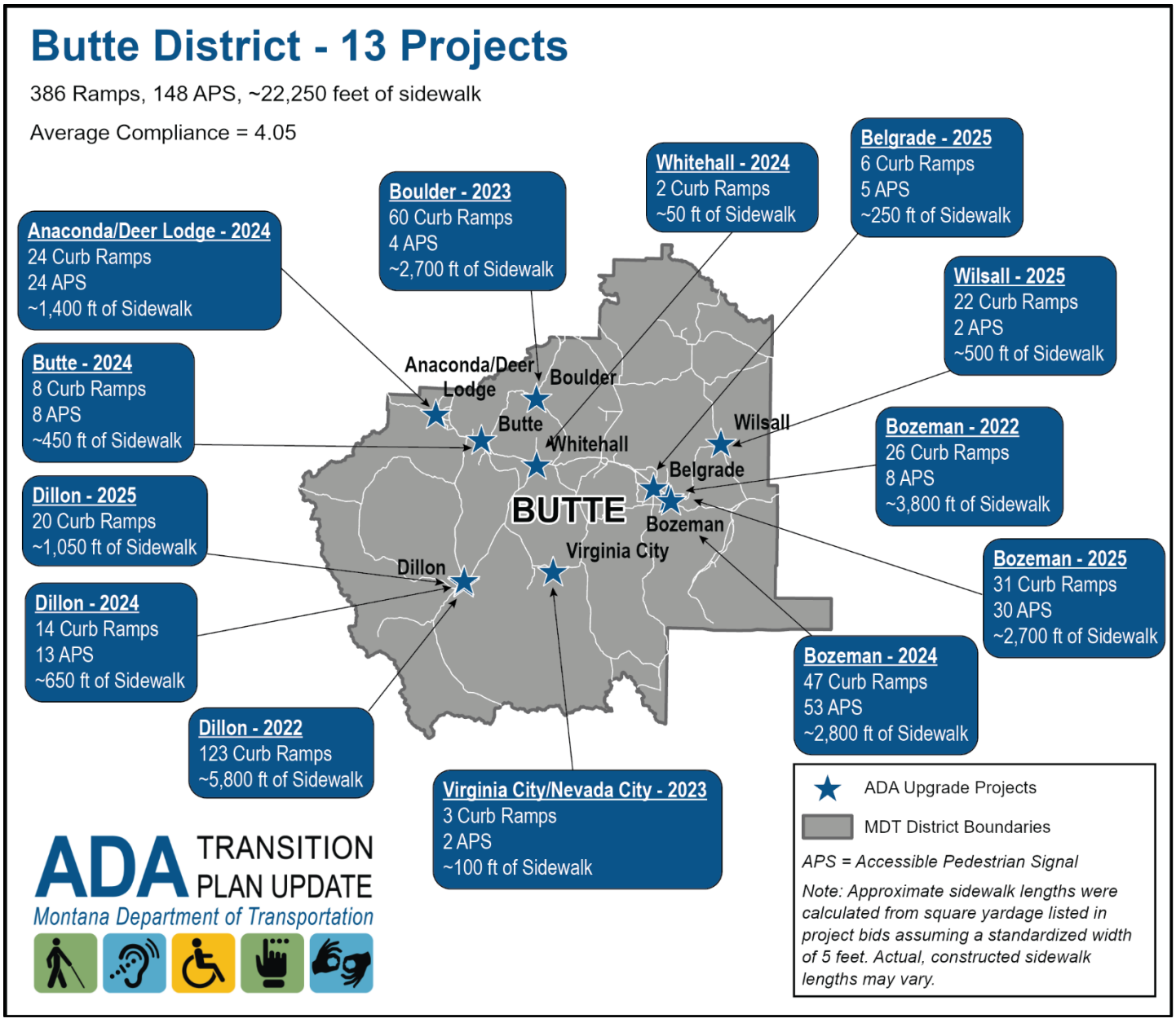


Figure 3: ADA Upgrades Completed in MDT District 2 (Butte)

2.3. District 3 – Great Falls

As shown in **Figure 4**, 12 projects were completed in the Great Falls District from 2022 to 2026. With those projects, MDT successfully implemented 311 ramps, 73 APS, and approximately 4,800 feet of new sidewalk across 6 communities. As of September 2026, the average curb ramp compliance score in the Great Falls District is 4.39.

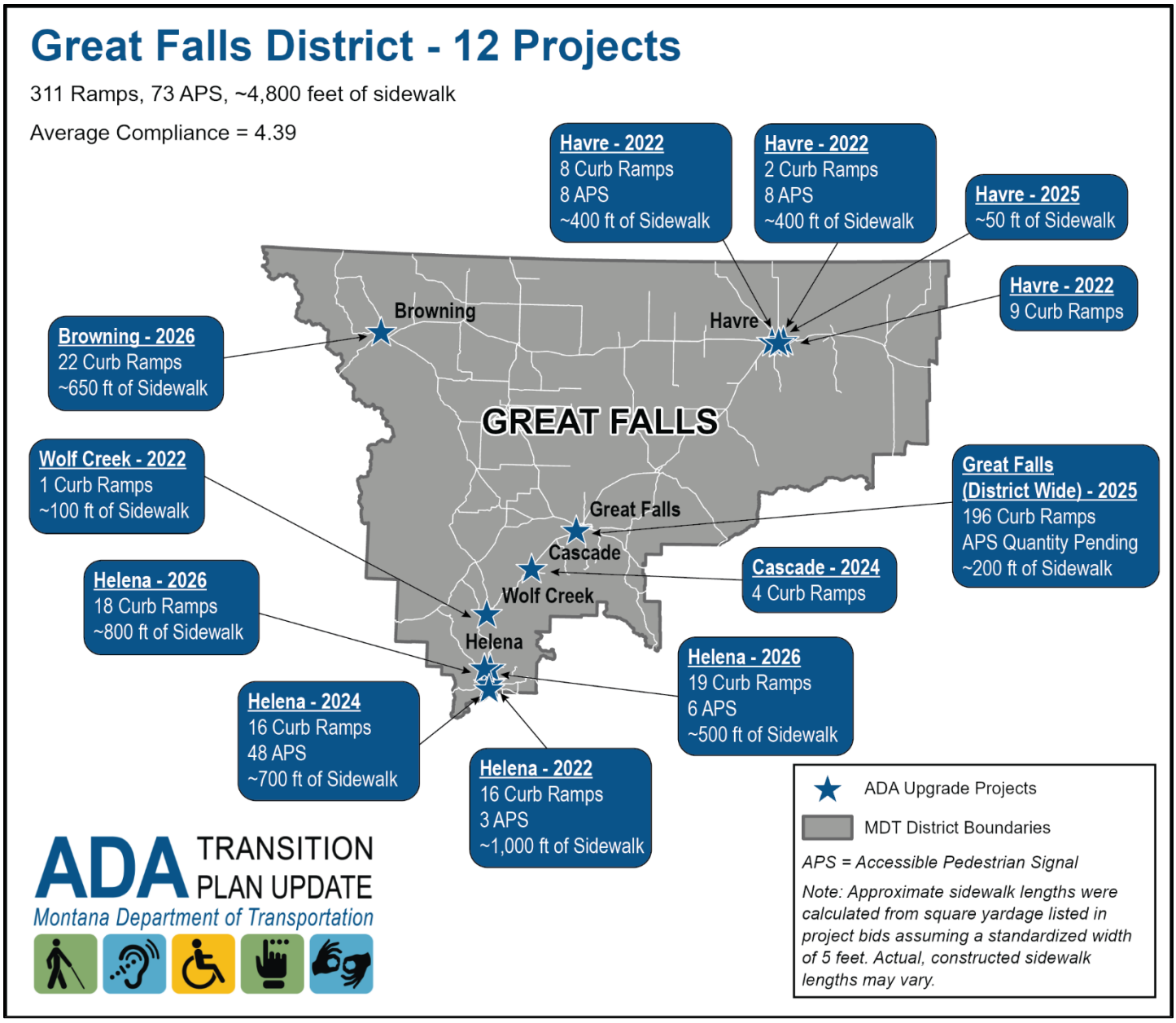


Figure 4: ADA Upgrades Completed in MDT District 3 (Great Falls)

2.4. District 4 - Glendive

Figure 5 shows presents the 10 projects completed in the Glendive District over the past five years. The projects have resulted in 306 new curb ramps, 20 APS, and approximately 27,350 feet of new sidewalk across 11 Montana communities. As of September 2026, the average curb ramp compliance score in the Glendive District is 5.04.

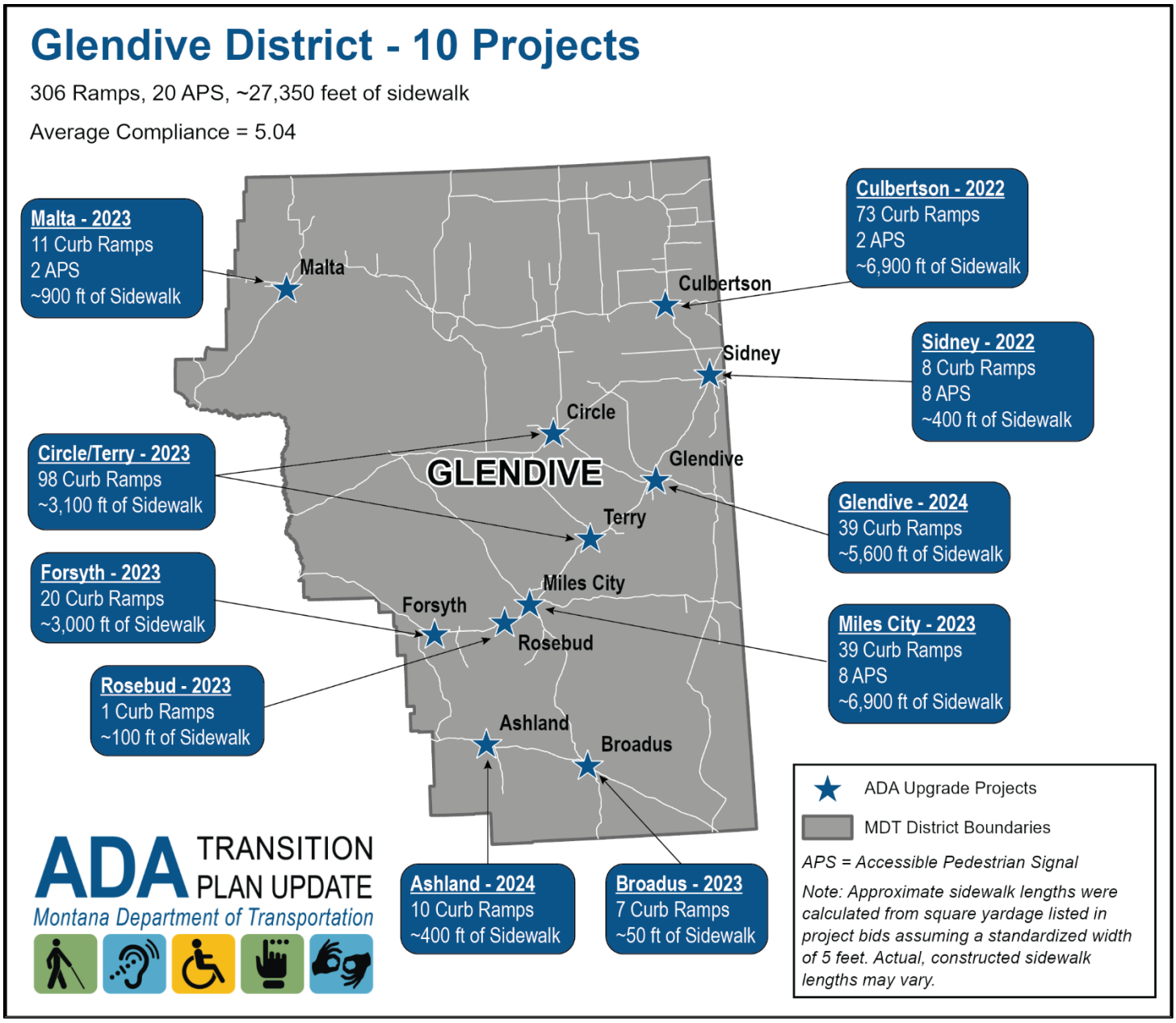


Figure 5: ADA Upgrades Completed in MDT District 4 (Glendive)

2.5. District 5 - Billings

As shown in **Figure 6**, 9 projects were completed in the Billings District from 2022 to 2026. With those projects, MDT successfully implemented 152 ramps, 58 APS, and approximately 20,370 feet of new sidewalk across 7 communities. As of September 2026, the average curb ramp compliance score in the Billings District is 4.58.

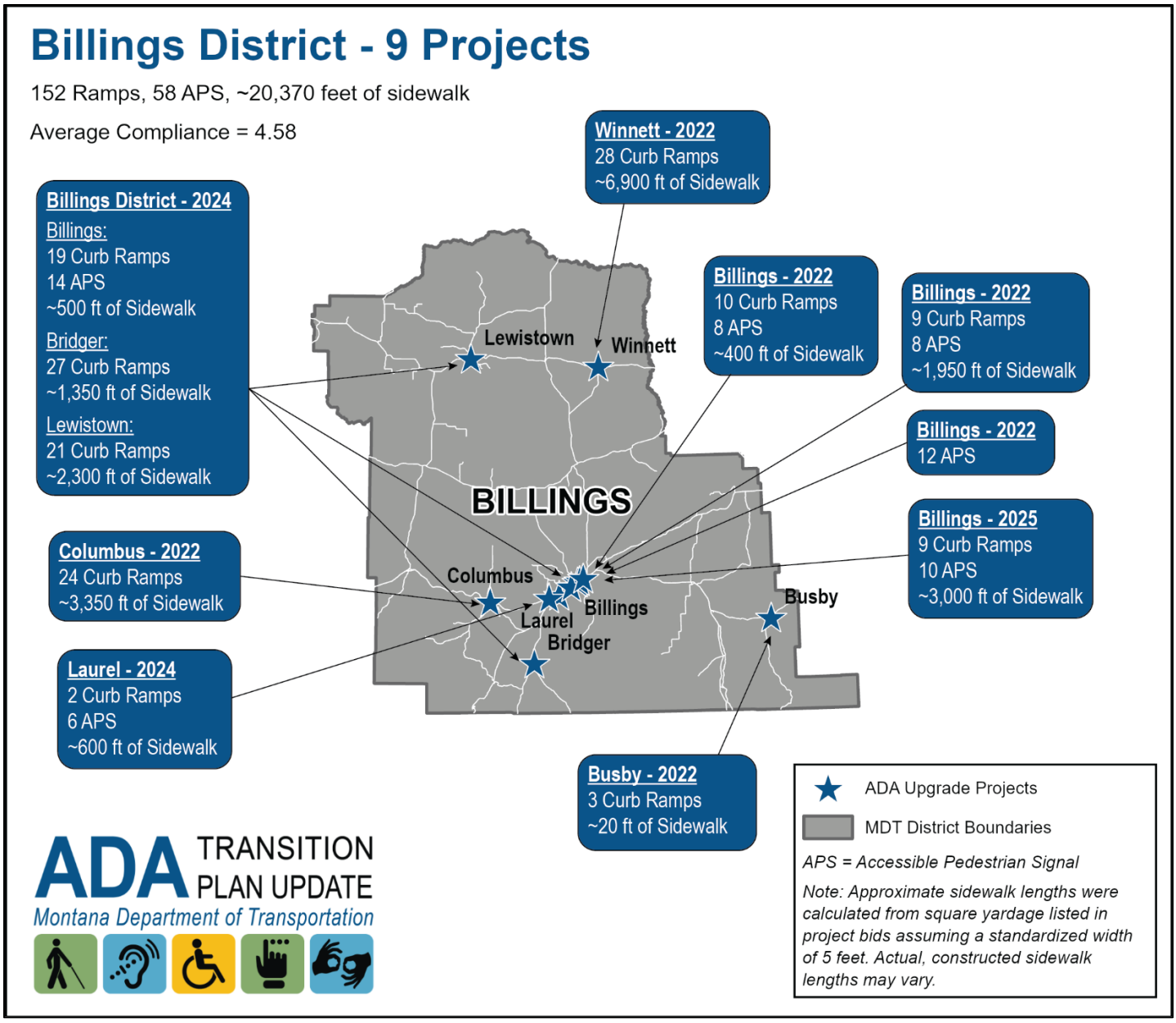


Figure 6: ADA Upgrades Completed in MDT District 5 (Billings)

3.0 Curb Ramp Progress

Curb ramp assessment results from October 2021 and September 2026 were compared to evaluate changes in progress in removing accessibility barriers over the five-year period. The comparison considers the number of inventoried curb ramps and average compliance and composite scores by MDT district, as well as notable changes within individual communities. In some cases, negative changes in the number of inventoried curb ramps may reflect updates to the inventory to remove outdated measurements and do not necessarily represent curb ramps removed between 2021 and 2026.

3.1. Changes by District

Table 1 compares the number of inventoried curb ramps and average compliance and composite scores for each MDT financial district in 2021 and 2026.

Table 1: Curb Ramp Assessment Changes from 2021 to 2026

MDT Financial Districts	Change in Number of Ramps	% Change in Number of Ramps	Change in Average Compliance Score	% Change in Average Compliance Score	Change in Average Composite Score	% Change in Average Composite Score
Billings	+35	+1.5%	-0.34	-6.9%	-2.88	-14.8%
Butte	+170	+5.6%	-0.44	-9.9%	-1.46	-8.0%
Glendive	+199	+12.4%	-1.21	-19.3%	-3.90	-17.1%
Great Falls	+103	+2.9%	0.00	-0.0%	-0.61	-3.4%
Missoula	+41	+0.9%	-0.49	-10.1%	-2.41	-10.8%
Total	**+548**	**+3.6%**	**-0.50**	**-10.0%**	**-2.25**	**-11.2%**

Between 2021 and 2026, the number of inventoried curb ramps increased by 548, or 3.6 percent, statewide. During the same period, the average compliance score decreased by 0.50, representing a 10.0 percent improvement, while the average composite score decreased by 2.25, representing an 11.2 percent change. Reductions in compliance scores indicate an overall improvement in curb ramp accessibility, since a compliance score of 0 indicates a fully accessible ramp. Since compliance scores are multiplied by demand to calculate a composite score, lower composite scores are also desirable, though could also reflect changed (lower) demand.

Improvements were observed across all five MDT districts. Each district added approximately 40 to 200 curb ramps to its inventory between 2021 and 2026, with increases ranging from 0.9 percent in the Missoula district to 12.4 percent in the Glendive district. Average compliance and composite scores also decreased in each district, indicating improved curb ramp accessibility across the state. Glendive experienced the greatest improvement, with its average compliance score decreasing by 19.3 percent and its average composite score decreasing by 17.1 percent. Billings, Butte, and Missoula experienced improvements in average compliance scores ranging from about 7-10 percent and improvements in average composite scores ranging from about 8-15 percent. Great Falls experienced essentially no change in its average compliance score but had a 3.4 percent improvement in its average composite score.

3.2. Changes by Urban Area and Community

Community-level results were reviewed to identify localized changes in curb ramp accessibility between 2021 and 2026 and to compare those changes with projects completed during the same period. Changes in the number of inventoried curb ramps may reflect physical changes to the curb ramp network as well as updates to the inventory, including the addition of new measurements and retirement of outdated measurements. Changes in compliance are often attributed to MDT's highway improvement or standalone ADA projects, however, some changes to compliance may reflect new construction by others (city, county, private), or updated measurements related to projects outside the five-year window.

URBAN AREAS

- **Bozeman:** The number of inventoried curb ramps increased by 11, while the average compliance score decreased by 1.89 points, an improvement of 41.0 percent. Over the past five years, three projects—N 7th Avenue/Griffin Drive, N 19th Avenue, and N 7th Intersection Improvements—addressed 104 curb ramps.
- **Butte:** The total number of inventoried curb ramps increased by 16, while the average composite score decreased by 7.1 points, an improvement of 39.8 percent. The Montana Street/Front Street project included improvements to eight curb ramps.
- **Glendive:** Glendive experienced one of the most substantial changes among the urban areas. The total number of inventoried ramps increased by 36, equivalent to 36.0 percent, while the average compliance score improved by 26.8 percent. The Merrill Avenue–Glendive project included improvements to 39 curb ramps. Multiple projects were also completed in Glendive in 2019, so the improve compliance scores may be reflective of updated inventories since those projects were completed.
- **Kalispell:** The number of inventoried curb ramps increased by 30, or 4.2 percent. The average composite score decreased by 2.26 points, or 13.8 percent. Two projects along US 93 included improvements to a combined 14 curb ramps.
- **Lewistown:** The average compliance score improved by 15.3 percent, while the average composite score decreased substantially by 11.32 points, an improvement of 63.5 percent. The D5 ADA Upgrades project included improvements to 21 curb ramps in Lewistown.
- **Miles City:** The number of inventoried ramps increased by nine, or 3.6 percent, and the average composite score decreased by 10.49 points, an improvement of 38.0 percent. The Miles City–North project included improvements to 39 curb ramps.
- **Missoula:** The number of inventoried curb ramps decreased by 86, or 5.1 percent, while the average compliance and composite scores improved by 18.2 percent and 77.2 percent, respectively. The decrease in ramps may partially reflect updates to the inventory or changed roadway configurations requiring fewer curb ramps. The Mary Jane/Broadway Intersection and Stephens/Orange Safety Improvements projects addressed a total of six curb ramps.
- **Polson:** Polson was added as an urban area after the 2021 assessment and is included in the 2026 urban-area results. Because comparable urban-area data are not available for 2021, changes in curb ramp inventory and average scores could not be calculated for Polson. No projects were completed within the Polson urban area over the past five years.

COMMUNITIES

- **Bainville:** The number of inventoried ramps increased by seven, or 43.8 percent. The average compliance score improved by 61.7 percent, and the average composite score improved by 56.1 percent. No MDT projects were completed in Bainville over the past five years.
- **Boulder:** Although the number of inventoried curb ramps did not change, the average compliance score improved by 34.5 percent, while the average composite score improved by 27.4 percent. The Boulder-Urban project included improvements to 60 curb ramps.
- **Bridger:** The average compliance score improved by 54.8 percent and the average composite score improved by 55.8 percent. The D5 ADA Upgrades project included improvements to 27 curb ramps in Bridger.
- **Circle:** The number of inventoried curb ramps increased by 13, or 20.3 percent. The average compliance score improved by 35.7 percent, while the average composite score improved by 21.6 percent. The Circle/Terry ADA Upgrades project included improvements to 82 curb ramps in Circle.
- **Culbertson:** The number of inventoried ramps increased by 48, or 70.6 percent. The average compliance score improved by 67.8 percent, and the average composite score improved by 56.1 percent. The US 2—Culbertson project improved 73 curb ramps.
- **Dillon:** Dillon experienced substantial improvement between assessments. The number of inventoried ramps increased by 49, or 35.0 percent, while the average compliance score improved by 62.1 percent and the average composite score improved by 61.9 percent. Three projects completed between the assessments addressed 157 curb ramps: Dillon-Urban (P-89), Signals-Dillon, and Montana Street-Dillon.
- **Fairview:** The number of inventoried ramps increased by 24, or 57.1 percent. The average compliance score improved by 69.7 percent, and the average composite score improved by 69.8 percent. No MDT projects were completed in Fairview over the past five years, but a 2021 project addressed 53 ramps.
- **Forsyth:** The average compliance score improved by 55.7 percent, and the average composite score improved by 50.9 percent. The Forsyth–East & West project included improvements to 20 curb ramps.
- **Poplar:** The number of inventoried ramps increased by 11, or 57.9 percent, while the average compliance score improved by 93.5 percent and the average composite score improved by 93.9 percent. These represent some of the largest percentage improvements in the community dataset. Although no MDT projects were completed in Poplar over the past five-years, a 2019 project updated 81 ramps in Poplar, potentially reflecting a lagged inventory.
- **Ronan:** The number of inventoried curb ramps increased by 25, or 35.2 percent. The average compliance score improved by 36.7 percent, while the average composite score improved by 38.2 percent. The Ronan-North project improved 14 curb ramps.
- **Terry:** The number of inventoried ramps increased by two, the average compliance score improved by 66.6 percent, and the average composite score improved by 58.7 percent. The Circle/Terry ADA Upgrades project included improvements to 16 curb ramps in Terry.
- **Thompson Falls:** The number of inventoried ramps increased by two, the average compliance score improved by 62.2 percent, and the average composite score improved by 66.7 percent. The Thompson Falls–Urban project improved 32 curb ramps.

- **Westby:** The number of inventoried ramps increased by nine, or 52.9 percent, while the average compliance score improved by 93.9 percent and the average composite score improved by 93.5 percent. These represent some of the largest percentage improvements in the community dataset; and although no MDT projects were completed in Westby over the past five years, a 2021 project addressed 26 ramps in Westby.
- **Winnett:** The number of inventoried ramps increased by seven, or 29.2 percent. The average compliance score improved by 67.7 percent, and the average composite score improved by 78.0 percent. The Main Street–Winnett project improved 28 curb ramps.

While many urban areas and communities experienced improved scores between 2021 and 2026, some locations experienced increases in average compliance or composite scores, indicating less favorable assessment results. These changes do not necessarily indicate that existing curb ramp conditions worsened during the five-year period. Changes in the number and location of inventoried ramps, the addition of previously unassessed ramps, and the retirement or updating of outdated measurements can affect average scores. In particular, new developments may increase demand, resulting in increased composite scores even if there have been no changes to compliance scores.

ADA TRANSITION PLAN UPDATE

Montana Department of Transportation



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