



Waylon Andrews
Public Works / ADA Coordinator

Americans with Disabilities Act Title II Transition Plan

Introduction

In September of 2003, the City of Boone Determined that a comprehensive evaluation of its entire street system was needed to determine the extent of its non-compliant ADA sidewalk curb ramps. Since 2003, the City of Boone has budgeted and financed the replacement of 467 of its originally estimated 3500 pedestrian ramps to be ADA compliant.

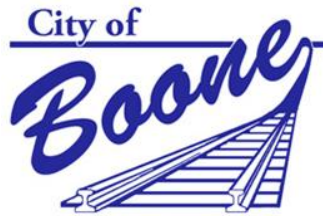
Proposed Action

Each year the City of Boone Has budgeted \$10,000 dollars towards the replacement, or construction of non-compliant ramps. The request for funding can be made through the ADA Coordinator, or City Building Official. The requests will be prioritized under 3 priorities. Priority 1 – Non-Compliant Ramps: These ramps do not have truncated domes. Some of these have a curb drop or do not have curb cuts for a pedestrian ramp at the street. Priority 2- Partially Compliant Ramps: These ramps at least have truncated domes. Examples are they were possibly not inspected, or having a cross slope at the street that may exceed a limit. Priority 3- Compliant Ramps: These Ramps have been constructed in 2001 or newer and were compliant based on the standards of that time. This plan will be updated no less than every 5 years.

Transition Plan

The Transition Plan is a structured document with information about the project in entirety. This includes but is not limited to Data, Inventory, Design guidance, funding sources, Improvements, and procedures. The funding for this plan will come from the Road Use Tax fund. The responsibility for funding this plan rests with the City Council of the City of Boone, Iowa. Responsibility for the implementation of this plan rests with the Director of Public Works under the general discretion of the City Administrator.

Waylon Andrews
ADA Coordinator



City Hall
923 8th Street
Boone, IA 50036

Americans with Disabilities Act

Title II - Transition Plan

Adopted November 7, 2022

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Chapter 1: Background

Americans with Disabilities Act (ADA) Legislation

ADA was signed into law Jan. 26, 1990, and became effective Jan. 26, 1992. ADA makes discriminating against people with disabilities unlawful.

ADA comprises several sections of the United States Code compiled into five subject areas referred to as titles:

- Employment (Title I),
- Public services (Title II),
- Public accommodations and services operated by private entities (Title III),
- Telecommunications (Title IV),
- Miscellaneous (Title V).

Title II is the area that the City of Boone (City) transition plan will focus on, as it specifically covers programs, services, or activities relating to areas of public transportation and updating existing infrastructure. Title II requires the City to develop a transition plan to bring facilities into compliance with ADA. This document presents the transition plan the City has developed for pedestrian facilities within the right of way. It does not discuss ADA compliance for buildings.

Title II of ADA

Title II places emphasis on the accessibility of infrastructure within the public right of way. In order to achieve accessibility and consistency, public agencies are required to modify their policies, practices, and procedures to avoid discrimination without altering the fundamental nature of services, programs, or activities. Facilities required to be ADA compliant include:

- Sidewalks,
- Crosswalks,
- Bus stops,
- Pedestrian signals,
- Trails and shared use paths
- Railroad crossings
- Pedestrian ramps, and
- Any other feature related to the safe movement of pedestrians.

Defining ADA Compliance

Features will be considered ADA compliant when they meet the criteria outlined in the documents listed below.

- Iowa Department of Transportation – Design Manual Section 12A
- Statewide Urban Design and Specifications – Design Manual Section 12A

Agencies Affected

All state and local governments with more than 50 public employees are required to prepare a self-evaluation of all roadways and pedestrian facilities within their jurisdiction and develop a transition plan for all noncompliant facilities.

ADA Transition Plan

The purpose of the transition plan is to identify the steps the City will take to achieve ADA compliance for pedestrian facilities. These steps are:

1. Identify physical obstacles limiting the accessibility of programs or activities to individuals with disabilities (see Chapter 2),

2. Describe in detail the methods that will be used to make facilities accessible (see Chapter 3),
3. Develop a Schedule for achieving compliance (see Chapter 4),
4. Identify the City's ADA coordinator who will be responsible for ADA compliance (see Chapter 5),
5. Develop a grievance procedure to review complaints (see Chapter 6),
6. Initiate public involvement and provide community awareness (see Chapter 7).

The first 4 steps are the minimum requirements for a transition plan as set forth by 28 CFR 35.150. The remaining steps are additional requirements for achieving ADA compliance as set forth by Title II.

In addition to the above steps, the City will track and report on their progress (see Chapter 8).

To ensure ongoing compliance with ADA requirements, the City will perform periodic reviews of the plan and update as necessary.

Chapter 2: Features Inventory

To assist with preparing the transition plan, the City used staff to identify and inventory all facilities affected by physical barriers limiting accessibility to individuals with disabilities. This inventory is currently being completed. The City staff is completing this task by compiling a database of curb ramps, and sidewalks and noting the associated features affected by ADA. Appendix B shows the inventory locations collected.

Utilizing ArcGIS, and the City of Boone aerial photography the inventory provided that the City of Boone has approximately 3500 existing sidewalk ramps. Further investigation will be completed to investigate the possibility of additional ramps to be added to the inventory.

Chapter 3: Design and Construction Guidance

Federal code requires:

- New facilities be designed and constructed such that they are “readily accessible to and usable by individuals with disabilities.”
- Existing facilities be altered such that “the altered portion of the facility is readily accessible to and usable by individuals with disabilities.”

The focus of this chapter is on guidance to:

- Ensure new pedestrian facilities are designed and constructed to be ADA compliant, and;
- Bring existing pedestrian facilities into compliance with ADA.

This chapter also addresses ADA compliance for pedestrian facilities during construction.

New Pedestrian Facilities

To assist both designers and contractors, the City will provide guidance for designing and constructing ADA compliant pedestrian facilities.

Guidance for Designers

The City has adopted and published Chapter 12 of the Iowa Statewide Urban Design and Specifications to assist designers with designing ADA compliant facilities. The guidance is updated as new information from the U.S. Access Board, U.S. Department of Justice, and Federal Highway Administration (FHWA) as released.

Guidance for Contractors

To assist contractors with building ADA compliant facilities, the City will inspect curb ramp and landing layouts prior to the contractor pouring concrete. The Contractor is required to request the inspection by contacting the Building Department at City Hall at 515-433-0633 a minimum 48 hours in advance of the pour.

Existing Pedestrian Facilities

Existing pedestrian facilities will be brought into ADA compliance by:

- Installing or replacing out of compliance features such as curb ramps and landings;
- Installing or replacing detectable warnings, and;
- Verifying that other features such as sidewalk widths, slopes, surfaces, and changes in level do not violate guidelines.

The same guidance provided above for new facilities will apply to improving existing pedestrian facilities. These improvements will be accomplished either as part of proposed construction projects or as ADA-specific projects. All improvements within the scope and limits of proposed construction projects will be completed with the project. ADA-specific projects will be developed based upon the carry over funds from the previous fiscal years sidewalk repair funds.

Part of Proposed Construction Projects

The City currently has an ongoing effort to construct and rehabilitate curb ramps and sidewalks at numerous locations within the City’s public right of way. Typically, the rehabilitation activities involve projects such as overlays and rehabilitation projects, in addition to full reconstruction,

utility work, and beautification projects. During these projects, pedestrian access areas will be improved according to ADA requirements.

ADA accommodation is considered throughout the development process beginning with the project concept and continuing through final design.

ADA Specific Projects

ADA specific projects are those specifically designed and funded for ADA improvements. ADA specific projects for public rights of way will include improvements required to eliminate non ADA compliant features.

ADA Compliance during Construction

When pedestrian facilities are disrupted during construction, a pedestrian traffic control plan should be prepared for the project. Any detour routes and open walkways (or sidewalks) should provide accessibility to at least the level of the route prior to construction.

Possible mitigation where ADA accommodations need to be provided during project construction could include:

- Install temporary hot-mix asphalt sidewalk at the required slopes.
- Install pedestal pedestrian push-buttons so they can be moved around when needed (include sound for the blind or visually impaired).
- Place temporary barriers or ADA compliant channelizing devices to channel pedestrians.
- Stage construction work on one-half of the crossing at a time.

Additional steps to consider include:

- Detour pedestrians to the next block to avoid the construction area. This could include a change order to use flaggers to keep pedestrians on the detour.
- Place closures at the sidewalks. Notify advocacy agencies of the closures as required by Section 2528 of the Standard Specifications.
- Install temporary sidewalk.
- Install traffic control devices to channel pedestrians through the construction zone when a detour is not needed.
- Stage the work to minimize the impact to pedestrians and accelerate sidewalk construction.

Chapter 4: Implementation and Schedule

Upgrades to meet ADA requirements can be part of regularly scheduled improvements or maintenance projects, or can be ADA specific projects.

The City **will** participate and provide funding of curb ramps and sidewalks:

1. If the rehabilitation\widening\reconstruction project is on public right-of-way and part of a City approved Capital Project.

The City **will not** participate and provide funding of curb ramps and sidewalks:

1. If the project is a non-city rehabilitation\widening\reconstruction\maintenance project, is on public right-of-way and causes the removal and replacement of the curb ramp or landing

Funding Sources

1. Funding for ADA associated projects will be provided by rollover of the funding from the sidewalk repair program.

Priorities

The ADA improvement needs described in Chapter 2 require prioritization in order to meet budget and development restraints. The document titled “ADA Transition Plans: A Guide to Best Management Practices” was used as a basis for setting priorities. This guide was prepared for the American Association of State Highway Transportation Officials (AASHTO) through the National Cooperative Highway Research Program to provide guidance to state highway agencies for developing transition plans for complying with the ADA’s administrative requirements.

The priorities as follows will be applied to the ADA deficiencies within City right of way.

Priority 1 - Non-Compliant Ramps: These are ramps that do not have truncated domes. Some of these do not have a curb drop for the ramp at the street. Some of these ramps could be removed in their entirety as there is no need for multiple crossings at the same intersection.

Priority 2 - Partially Compliant Ramps: These are ramps that at least have truncated domes. Further inspection of these ramps should be completed, as some could be moved to the compliant ramp category. Many of these were built by residential home builder contractors and so there was less inspection completed on these ramps.

Priority 3 - Compliant Ramps: These are ramps that were constructed in 2010 or sooner and were compliant based on the standards of that time. Some of these ramps could exceed the cross slope in the street but for the most part are compliant. These ramps were mainly done as part of City Projects, in which a City Inspector was present and so the likelihood that they are compliant is good.

Implementation Plan and Schedule

Identified ADA public rights of way improvements within a project included in the approved City of Boone Capital Improvement Plan will be completed as part of such projects. Other identified ADA public rights of way improvements will be included in ADA-specific projects and prioritized based on priorities shown above, and scheduled based on the available funding.

The following implementation strategy for ADA-specific projects is proposed. Projects will generally be divided into City-wide projects.

Priority 1-3 Improvements

Within the City of Boone Capital Improvement Plan, the distribution of funding will be set by the provided funding allowable by the rollover of funding from the previous fiscal years sidewalk repair program. The budget will provide for the ADA Sidewalk Compliance Program.

The following is the estimated schedule:

Fiscal Year	Funding	Remarks
FY 19-20	\$10,000	ADA Sidewalk Compliance Program
FY 20-21	\$10,000	ADA Sidewalk Compliance Program
FY 21-22	\$10,000	ADA Sidewalk Compliance Program
FY 22-23	\$10,000	ADA Sidewalk Compliance Program
FY 23-24	\$10,000	ADA Sidewalk Compliance Program
FY 25-26	\$10,000	ADA Sidewalk Compliance Program
FY 26-27	\$10,000	ADA Sidewalk Compliance Program

*Tentative, based on the City of Boone Capital Improvement Program, to be updated annually. The Schedule will be updated accordingly to reflect new funding levels.

The schedule and priorities shall be tracked, reviewed, and adjusted as described in Chapter 8.

Chapter 5: ADA Coordinator

The City of Boone Public Works Director, or his/her designated representative, will serve as the ADA Coordinator. The contact information is as follows:

City of Boone
Waylon Andrews
923 8th Street
Boone, IA 50036

Office 515-432-4211

wandrews@city.boone.ia.us

www.boonegov.com

Chapter 6: Grievance Procedure to Review Complaints

The City of Boone is required to adopt and publish procedures for resolving complaints arising under ADA's Title II. The procedures are intended to set up a system for resolving complaints of disability discrimination in a prompt and fair manner. Appendix A contains the form used to review complaints.

This Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 (ADA). It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the City of Boone, Iowa. The City's Personnel Policy governs employment-related complaints of disability discrimination.

The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of complainant and location, date, and description of the problem. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint will be made available for persons with disabilities upon request.

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

- Waylon Andrews
- Public Works Director / ADA Coordinator
- Boone City Hall
- 923 8th Street
- Boone, Iowa 50036

Within 15 calendar days after receipt of the complaint, Waylon Andrews or his designee will meet with the complainant to discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting, Waylon Andrews or his designee will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of the City of Boone and offer options for substantive resolution of the complaint.

If the response by Waylon Andrews or his designee does not satisfactorily resolve the issue, the complainant and/or his/her designee may appeal the decision within 15 calendar days after the receipt of the response to the Boone Public Safety Committee or its designee.

Within 30 calendar days after the receipt of the appeal, the Boone City Council or its designee will meet with the complainant to discuss the complaint and possible resolutions. Within 30 calendar days after the meeting, the Boone Public Safety Committee or its designee will respond in writing, and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint.

All written complaints received by Waylon Andrews or his designee, appeals to the Boone Public Safety Committee or its designee, and responses from these two offices will be retained by the Office of the City Clerk for at least three years.

Chapter 7: Public Involvement and Community Awareness

The City will provide on its website information explaining the ADA accessible sidewalk program. The site will also include:

- A project list and project updates with photographs, when available;
- Contact information for the ADA compliance coordinator;
- A link to the grievance procedure that has been developed and will be maintained by the City;
- A link to the Title VI/ADA brochure;
- A link to the Title VI website (the Title VI website will also have a link to this ADA website).

When the website is updated containing the information above, the City will distribute a news release promoting the update to the website.

The City will provide for the distribution the transition plan to the following for comment review:

- Boone City Hall;
- Boone Public Library;
- Boone Parks Department.

A cover letter will be included explaining the transition plan. Reviewers will submit their comments to the City of Boone ADA Coordinator. Comments received within 30 days will be considered for further action.

Chapter 8: Monitoring and Progress Report

The City will use the following process to monitor construction projects and track ADA compliance:

- Ensure standards are up to date according to ADA requirements for compliance defined in Chapter 1;
- Monitor construction activities or ensure they comply with applicable standards;
- Track progress.

Ensure Standards are up to Date

The City is continually reviewing design guidelines and standards and making necessary changes to comply with the ADA requirements for compliance defined in Chapter 1. When necessary, the Standard Specifications are revised to reflect changes in design guidance and standards.

Monitor Construction Activities

Curb ramps need to be constructed properly and in compliance with all applicable codes and standards. Therefore, the ongoing monitoring of construction activities and reporting of the status of improvements is important in assuring an effective overall program.

Track Progress

The City established a baseline of existing pedestrian crossing locations by documenting the types of existing curb ramps and identifying ADA compliance deficiencies. This was accomplished by field inspection or using GIS and aerial or satellite photography. This inventory is stored in a geospatial database. This allows map displays to be created to show the locations of transition areas and their corresponding level of ADA compliance.

To track progress, surveys and inspections will be continued on a regular basis and the results compared to the baseline. The goal is for inspections to be updated every two to four years depending on the need. These inspections will be based upon the most up to date ADA requirements. Information will be added to the database when new curb ramps are constructed. The tracking procedure will inventory curb ramps, signal push buttons, sidewalks, etc. and track dollars spent. The database will also provide a suitable mechanism for performance measurement.

Projects will typically fall into one of two categories; as a complete ADA-specific project, or as part of a non ADA-specific project. In the case of non ADA-specific projects, specific bid items will be used to track the work for ADA compliance. Otherwise, ADA-specific projects will be listed in the City's Capital Improvement Plan.

Appendix A: Form for Grievance Procedure to Review Complaints

I. Requestor Information

Name: _____ Date: _____

Address: _____

Phone: _____

Email: _____

II. Location of Grievance of ADA Compliance Deficiencies

Street address or description of location:

Signature

Date

III. ADA Coordinator Response

Name: _____ Date: _____

Signature

Date

IV. Council Appeal

Date: _____

Appendix B: Inventory of Compliance

Americans with Disabilities Act ADA Truncated Dome Inventory

<u>Year</u>	<u>Intersection</u>	<u>Quadrant</u>	<u>Total</u>
FY 07	W 2nd & Main	NE 2, SE 2, NW 1, SW 1	6
	200 Block of Main	Middle of block West 1, East 1	2
	W 2nd & State	NW 2, SW 2	4
	7th & Greene	NW 1	1
	8th & Greene	SE 2, SW 2, NE 2	6
	9th & Greene	SW 2, NW 1	3
	10th & Greene	NE 1, NW 1, SW 2	4
	11th & Greene	NW 2, NE 2, SW 2, SE 2	8
	8th & Runyen	North Side of 8th 1, SE 1	2
	7th & Allen	NE 2, South of 7th East of Allen 1	3
	7th & Keeler	South of 7th East of Keeler 1	1
	7th & Boone	SE 1	1
	6th & Marshall	NW 2, NE 2, SW 2, SE 2	8
	7th & Benton	NW 1, NE 1, SW 1	3
	7th & Linn	SE 2	2
	5th & Greene	SE 1, SW 1, Ne 1, NW 2	5
	6th & Greene	SE 1, NE 1, SW 1	3
	Franklin & W Mamie	SW 1, SE 1	<u>2</u>
			64
FY 08	Union & Morningside	SE 1	1
	Crestwood & Southview	SE 2	2
	11th & Tama	NW 2, NE 2	4
	W 5th & Franklin	NE 2	2
	W 8th & State	NE 2	2
	15th & Marshall	NE 1	1
	1202 Southview	SE 1	1
	8th & Runyen	SE 1	1
	8th & Greene	SE 2, SW 2, NE 2	6
	9th & Greene	SW 2, NW 1	3
10th & Greene	NE1	<u>1</u>	
		24	
FY 09	S Marshall & Union	SE 2, SW 1, NW 1	4
	S Tama & Garst	NE 2, NW 1	3

	S Tama & Aldrich	NE 1, NW 1	2
	S Marshall & Aldrich E	NE 1	1
	S Marshall & Aldrich W	NW 1	1
	Lincoln & S Story	NE 1	1
	5th & Story	SE 2, SW 2, NW 1	5
	9th & Keeler	NW 1	1
	11th & Marshall	SE 1, NE 2, NW 2, SW 2	<u>7</u>
			25
FY 10	14th & Benton	SW 1	1
	7th & Benton	Alley SE 1	1
	7th & Arden	NW 1	1
	S Marshall & Union	NE 2, SE 2, SW 1, NW 1	6
	15th & Carroll	NW 1	1
	819 10th	Alley 1	1
	1305 Greene	Alley 1	1
	18th & Carroll	NE 1	1
	Mamie & State	NW 2	<u>2</u>
			15
FY 11	327 S Story	Alley 1	1
	Safe Routes to School Program		
	7th & Greene	S Side of 7th at Alley	2
	7th & Greene	N Side of 7th at Alley	2
	7th & Carroll		4
	7th & Crawford		6
	20th & Crawford		2
	19th & Crawford		8
	18th & Crawford		4
	17th & Crawford		4
	16th & Crawford		4
	15th & Crawford		4
	14th & Crawford		4
	21St & Crawford		2
	11th & Crawford		4
	12th & Crawford		4
	13th & Crawford		4
	10th & Crawford		4
	8th & Crawford		5
	9th & Crawford		2
	9th & Story	NW 1, NE 1, SE 1, SW 1	<u>4</u>
			73

FY 12	Ashwood & Westwood	NE 2	2
	12th & Marshall	NE 2, SE 2, SW 1	5
	12th & Tama	SE 2, NW 1, NE 2	5
	12th & Boone	NW 1	1
	12th & Greene	NE 1, NW 1, SE 1 SW 1	4
	Union & S Boone	SW 2, NW 2, NE 2	6
	College & Main	SE1	1
	219 W 10th	Alley 1, NE 1	2
	13th & Benton	NW 1	1
	1121 13th	Alley 1	1
	20th & Boone	SW 1, SE 1	2
	11th & Division	NE 1	1
	5th & Cedar	NE 1	1
	7th & Tama	NW 1	1
	S Marshall & Kate Shelley	SW 1	1
	13th & Marshall	NW 1	1
	814 7th	Alley	1
	903 Jefferson	NW 2	2
	636 Westwood Blvd	NE 2	<u>2</u>
			40
FY 13	11th & Greene	NE 2, NW 2, SE 2, SW 2	8
	708 State	NE 1	1
	329 S Boone	NW 2	2
	301 Ashwood CT	NW 2	2
	1528 3rd	Alley 1	1
	7th & Story	NW 2, NE 2, SE 2, SW 2	8
	1012 S Jackson	NE 2	2
	923 8th	Alley 1	1
	S Greene & Forest Ave	SW 1	1
	Main & W Mamie	SW 2	2
7th & Harrison	NE 2	<u>2</u>	
		30	
FY 14	W 5th & Division	NW 1, SW 1	2
	W 7th & Allison	SW 1, SE 1	2
	12th & Benton	NW 1, NE 1, SE 1, SW 1	4
	12th & Linn	NW 1, NE 1, SE 1, SW 1	4
	12th & Meridian	NW 1, NE 1, SE 1, SW 1	4
	12th & Cedar	NW 1	1
	5th & Monona	NE 1	1
	8th & Arden	NW 1	<u>1</u>
		19	

FY 15	W1st & State	NW 1, NE 1	2
	College & Fremont	NW 1	1
	College & State	NE 1, SW 1	2
	W 4th & Main	NE 1, SE 1, SW 1, NW 1	4
	W 5th & Main	NE 1, SE 1	2
	W 4th & Franklin	NE 1, SE 1, NW 1, SW 1	<u>4</u>
			15
FY 16	W 5th & Division	NW 1, SW 1	2
	W 4th & McPherson	NE 2	2
	W 4th & Washington	NW 1, SW1, NE 1	3
	w 5th & Jefferson	NE 1, NW 2, SW 1, SE 1	5
	W 5th & Clay	NE 2, NW 1, SW 2, SE 1	6
	w 5th & Morton	NW 1, SW 2, SE 1	<u>4</u>
			22
FY 17	8th & Keeler	NW 1, NE 1, SW 1, SE 1	4
	9th & Keeler	SE 1, SW 1	2
	9th & Arden	SE 1, SW 1	2
	9th & Greene	SE 1	1
	9th & Carroll	NW 1, NE 1, SW 1, SE 1	4
	8th & Greene	NW 1	1
	8th & Arden	NW 1, SW 1, NE 1	3
	7th & Arden	NE 1, SW 1	2
	8th & Runyen	SW 1	1
	6th & Boone	SW 1, SE 1	2
	5th & Boone	NE 2, SW 1, SE 1	4
	5th & Story	NE 1	1
	5th & Marshall	NW 1, NE 1, SW 1, SE 1	4
	8th & Allen	NW 1, NE 1, SW 1, SE 1	<u>4</u>
			35
2022 Audit	11th & Benton	NW 1, NE 1	2
	11th & Tama	NW 1, NE 1	2
	11th & Marshall	NW 2, NE 2, SW 2, SE 2	8
	11th & Story	NW 2, NE 2, SW 2, SE 2	8
	11th & Boone	NW 2, NE 2, SW 2, SE 2	8
	11th & Greene	NW 2, NE 2, SW 2, SE 2	8
	11th & Carroll	NW 2, NE 2, SW 2, SE 2	8
	11th & Crawford	NW 2, NE 2, SW 2, SE 2	8

11th & Monona	NW 2, NE 1, SW 1	4
11th & Harrison	NW 2, NE 2, SW 2, SE 2	8
12th & Marshall	NW 2	2
Marshall ST N of 12th	Mid Block W side	1
12th & Story	NE 2	2
10th & Harrison	NE 1, SE 1	2
900 Block 7th	Alley NE 1	1
702 Greene	NE 1, Alley 1	2
17th & Tama	SW 1	1
W Mamie & State	NE 2	2
S Linn & Union	NW 2, NE 2, SW 2, SE 2	8
S Marshall & SW Marshall	Parking lot 1	1
S Marshall & Park	NW 2, NE 2, SW 2, SE 2	8
S Marshall & Lincoln	NW 1, SW 2	3
S Webster & College	NE 2	2
W 2nd & Franklin	SW 2	2
S Webster & W 1st	SE 2	2
Franklin & College	NW 1	<u>1</u>
		104

Total 467