DATE FILED: January 25, 2016 1 13 PM District Court, City and County of Denver, Colorado FILING ID: 66CFA3227F30F 1437 Bannock Street CASE NUMBER: 2016CV30247 Denver, CO 80202 Plaintiff: Margaret Denny, on behalf of herself and a proposed class of similarly situated people defined below v. Defendant: City & County of Denver Attorneys for Plaintiff: COURT USE ONLY Timothy P. Fox (Atty. Reg. No. 25889) Civil Rights Education and Enforcement Center 104 Broadway, Suite 400 Case Number: Denver, CO 80203 (303) 757-7901 Div: Ctrm: tfox@creeclaw.org Kevin W. Williams (Atty. Reg. No. 28117) Colorado Cross-Disability Coalition **Empire Park** 1385 S. Colorado Blvd., Suite 610-A Denver, CO 80222 (303) 839-1775 kwilliams@ccdconline.org CLASS ACTION COMPLAINT

Plaintiff Margaret Denny, on behalf of herself and a proposed class of similarly situated people defined below, by and through undersigned counsel, files her Class Action Complaint and respectfully alleges as follows:

I. <u>INTRODUCTION</u>

- 1. This lawsuit is brought against the City and County of Denver ("the City" or "Defendant") to redress Defendant's failure to provide legally required access to persons who use wheelchairs or scooters for mobility by denying them the benefits of its programs and services. Specifically, Defendant has failed to comply with Title II of the Americans with Disabilities Act of 1990 (42 U.S.C. § 12131, et seq.) ("ADA") and Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794, et seq.) ("Section 504") with regard to the installation, maintenance, and design of curb ramps that permit people who use wheelchairs or scooters to access and use the City's pedestrian right of way.
- 2. As a result, persons who use wheelchairs or scooters must choose between remaining segregated from significant amounts of daily activities including visiting public facilities, places of public accommodation, or friends and thereby remaining safe, or risking injury or death by traveling in roadways because they cannot access the pedestrian right of way. The lack of access to Defendant's pedestrian right of way deprives such persons of their independence.
- 3. Plaintiff Margaret Denny, on behalf of a class of persons who use wheelchairs or scooters for mobility, brings suit seeking an injunction requiring Defendant to remedy its past discrimination by installing curb ramps where they should have been installed in the past, bringing curb ramps that are out of compliance with design requirements into compliance, and requiring Defendant to adopt policies and practices ensuring that it will comply with the ADA and Section 504 requirements governing curb ramps in the future.
- 4. This case is being filed simultaneously with a motion for certification of a class for settlement purposes only and preliminary approval of a settlement agreement. That is because, as described more fully in that motion, the parties to this case, after two years of extensive, arm's-length negotiations have reached a comprehensive settlement that provides substantial injunctive relief to the class.

II. JURISDICTION AND VENUE

- 5. This is an action for declaratory and injunctive relief, brought pursuant to the ADA and Section 504 to redress systemic civil rights violations against people with mobility disabilities by the City.
- 6. The two claims alleged herein arise under the ADA and Section 504 such that the jurisdiction of this Court is invoked pursuant to Colo. Rev. Stat. §§ 13-1-124; 13-51-101, *et seq.*; and Colo. R. Civ. P. 57 and 65.
- 7. Venue over Plaintiff's claims is proper in this Court because Defendant resides in this county within the meaning of Colo. R. Civ. P. 98(c).

III. PARTIES

- 8. Plaintiff Margaret Denny is a member of the Civil Rights Education and Enforcement Center (CREEC) and is and has been at all relevant times a resident of Denver, Colorado. Among other impairments, Plaintiff Denny has chronic pain, is substantially limited in the major life activity of walking, and uses a motorized wheelchair for mobility. She has a disability within the meaning of the ADA and Section 504. Because Plaintiff Denny requires accessible curb ramps to be able to utilize the City's pedestrian right of way, she has a personal interest in ensuring that the City complies with federal requirements governing accessibility of curb ramps. Plaintiff Denny is also a tester in this litigation.
- 9. The Plaintiff class consists of all persons with disabilities who use wheelchairs or scooters for mobility who, through the date of preliminary approval of the Settlement Agreement, use or will use the pedestrian right of way in the City and County of Denver. References herein to "Plaintiff" or "Plaintiffs" shall be deemed to include the Named Plaintiff and each member of the class, unless otherwise indicated.
- 10. Presently, and at all times relevant to this Complaint, Defendant City and County of Denver has been a public entity within the meaning of Title II of the ADA, and has received federal financial assistance within the meaning of Section 504. Defendant is a local government entity with the responsibility of providing all members of the proposed class with access to its public facilities, programs, services, and activities. Defendant is responsible for constructing, maintaining, repairing, and regulating the City's pedestrian right of way.

IV. FACTS APPLICABLE TO ALL CLAIMS

- 11. Federal disability access laws were enacted to provide persons with disabilities an equal opportunity to participate fully in civic life. *See* 29 U.S.C. § 794 (Section 504); 42 U.S.C. § 12101(a)(7) (ADA). Under the ADA and Section 504, a public entity's sidewalks, crosswalks, and paved paths -- collectively referred to as a public entity's "pedestrian right of way" -- are a "program," "service," or "activity" that must be readily accessible to persons with mobility disabilities. *Barden v. City of Sacramento*, 292 F.3d 1073, 1076 (9th Cir. 2002).
- 12. The City's pedestrian right of way is in fact a fundamental public program, service, and/or activity that the City provides for the benefit of its residents and visitors. Accessible curb ramps are necessary to permit people with mobility disabilities who use mobility aids such as wheelchairs or scooters to access the City's pedestrian right of way. Because the City's pedestrian right of way constitutes a core mode of transportation, the absence of accessible curb ramps prevents people with mobility disabilities from independently, fully, and

3

¹ This lawsuit covers only curb ramps on City street segments with sidewalks, and does not apply to (1) components of the City's sidewalk system other than curb ramps, (2) street segments that do not contain sidewalks but do contain bus stops, and (3) curb ramps adjacent to roads that comprise the State Highway System as defined in Colo. Rev. Stat. § 43-2-101 and -102.

meaningfully participating in all aspects of society, including employment, housing, education, transportation, public accommodations, and recreation, among others. Accordingly, an accessible pedestrian right of way is essential to realizing the integration mandate of disability non-discrimination laws, including the ADA and Section 504.

- 13. Defendant has excluded individuals with mobility disabilities from participation in or denied them the benefits of Defendant's pedestrian right of way program, service, or activity, or subjected them to discrimination by: (a) failing to install and remediate curb ramps in newly-constructed or altered portions of the City's pedestrian right of way; and (b) failing to install, remediate and maintain curb ramps where necessary to provide people with mobility disabilities meaningful access to the City's pedestrian right of way, when viewed in its entirety.
- 14. Both the ADA (since January 27, 1992) and Section 504 (since June 3, 1977) have mandated that whenever a public entity itself newly constructs or alters streets, roads, or highways, it must install curb ramps at any intersection having curbs or other barriers to entry from a street level pedestrian walkway, to ensure that newly constructed or altered pedestrian right of way programs and facilities are readily accessible to and usable by individuals with disabilities. 28 C.F.R. § 35.151(a)(1), (b)(1), (b)(4), (i); 28 C.F.R. pt. 36, app. D § 4.7; 45 C.F.R. § 84.23(b); 36 C.F.R. pt. 1191, app. D § 405 (the "new construction and alterations requirement").
- 15. The ADA and Section 504 also mandate that a public entity operate each of its programs, services, or activities so that the program, service, or activity, when viewed in its entirety, is readily accessible to and usable by individuals with disabilities. 28 C.F.R. § 35.150(a), (b)(1); 45 C.F.R. § 84.22(a), (b) (the "program access requirement"). To the extent structural changes to facilities existing as of the effective date of the ADA or Section 504 are necessary to achieve this "program access" mandate, such changes were to have been made by no later than January 26, 1995 under the ADA, and by no later than June 3, 1980 under Section 504. 28 C.F.R. § 35.150(c); 45 C.F.R. § 84.22(d).
- 16. Both the ADA and Section 504 also require compliance with applicable standards for accessible design (*i.e.*, the Uniform Federal Accessibility Standards ("UFAS"), 1991 ADA Standards for Accessible Design ("ADAAG"), or the 2010 ADA Standards for Accessible Design ("2010 ADAAG"). These standards contain detailed design specifications addressing such issues as, for example, the slope of curb ramps and their location. The ADA also required public entities, by March 15, 2012, to remediate new construction or alterations that were not done in compliance with the standards in effect at the time of construction. 28 C.F.R. § 35.151(c)(5)(i).
- 17. Beginning in 2013, proposed Class Counsel CREEC commenced an investigation into whether Defendant had complied with the ADA and Section 504 curb ramp requirements.
- 18. For example and without limitation, CREEC submitted an open-records request to Defendant, which requested the identity of the sections of all streets in Denver that have

undergone alterations since January 26, 1992, the effective date of Title II of the ADA (and after the effective date of Section 504).

- 19. In response to this request, Defendant produced a spreadsheet identifying more than 15,000 sections of city streets that had been altered since that date. CREEC spent a substantial amount of time reviewing and analyzing this spreadsheet.
- 20. CREEC then commissioned a survey of a sampling of those thousands of city streets. That survey revealed the hundreds of violations shown in Appendices 1 and 2 to this Complaint.
- 21. In addition to this survey, two CREEC members, Named Plaintiff Margaret Denny and another individual who uses a wheelchair for mobility who themselves have been denied access to the City's pedestrian right of way by Defendant's violations acted as testers for CREEC. In that capacity, they encountered corners in Denver without curb ramps at intersections that had been altered after the effective date of the ADA and Section 504.
- 22. This investigation revealed that Defendant has systematically failed, and is failing, to comply with numerous federal requirements governing curb ramps. Even based only on a limited sampling, Plaintiff identified hundreds of intersections that underwent alterations after the effective date of the ADA but are missing curb ramps. The specific violations listed below were also uncovered during and as part of CREEC's investigation.
- 23. For example and without limitation, Defendant has not complied with the new construction and alterations requirement because it has repeatedly engaged in new construction or alterations to streets and roads without installing curb ramps. For example, CREEC's investigation into the City's curb ramps found that Defendant conducted alterations or new construction to streets after the effective date of the ADA but failed to install curb ramps in the nearly 400 examples attached as Appendix 1 to this Complaint.
- 24. Additionally, Defendant has not complied with the accessible design standards requirement. For example, CREEC's investigation into the City's curb ramps found the more than 90 curb ramps with slopes greater than permitted by accessible design standards, as shown as Appendix 2 to this Complaint.
- 25. Further, Defendant has not complied with the program access requirement because thousands of streets exist in the City without any curb ramps whatsoever, or with curb ramps that do not comply with the accessible design standards, as shown in examples of ramps that remained in violation as of at least 2014 in Appendix 3 to this Complaint.
- 26. On information and belief, the violations and denials of meaningful, equal, and safe access complained of herein are the direct result of Defendant's failure to implement policies, procedures, and practices that would ensure compliance with these requirements, including but not limited to the following:

- a. The failure to install accessible curb ramps at locations where no curb ramps exist, or where inaccessible curb ramps exist, within the time required by applicable federal disability access laws or on any other reasonable schedule;
- b. The failure to install accessible curb ramps, or remediate existing noncompliant curb ramps, at street corners that are newly constructed, resurfaced, or otherwise altered:
- c. The failure to install curb ramps at intersections in the City that are necessary to provide meaningful, equal and safe access to the pedestrian right of way;
- d. The failure to develop and implement a process for identifying intersections and corners throughout the City at which curb ramps are necessary to provide meaningful, equal, and safe access to the pedestrian right of way;
- e. The failure to adopt and utilize or require and enforce the utilization of a curb ramp design that complies with applicable design standards;
- f. The failure to adopt or implement reasonable administrative methods, policies, and procedures for inspecting, repairing, and maintaining the pedestrian right of way, including curb ramps, as required by the ADA and its implementing regulations including 28 C.F.R. § 35.133 (maintenance of accessible features);
- g. The failure to remediate curb ramps that are designed and/or constructed in a noncompliant manner such that people with mobility disabilities are denied meaningful access to the pedestrian right of way as a whole.
- 27. As a direct result of missing and noncompliant curb ramps at intersections throughout the City, as well as Defendant's administrative methods, policies, and practices, or lack thereof that result in those lacking ramps, individuals with mobility disabilities are denied meaningful access to the City's pedestrian right of way, public buildings, parks, transportation, and/or places of employment and public accommodation, either through complete denials of access or through delay of travel or unsafe conditions.
- 28. This lack of accessible curb ramps is not isolated or limited. Rather, these barriers to full and equal access are present throughout the City, including but not limited to the following areas: Capitol Hill, University of Denver, Highlands, Uptown, Santa Fe Arts District, and South Park Hill neighborhoods, as well as areas surrounding the Denver Country Club, East Colfax Avenue between Quebec and Yosemite Streets, West Colfax Avenue and South Federal Boulevard, and West Alameda Avenue and South Federal Boulevard. As a result, persons with mobility disabilities have been denied access to the accommodations and services available to the general public. Furthermore, these barriers deter persons with mobility disabilities from exploring or visiting areas of the City. These barriers also delay travel and cause persons with mobility disabilities to fear for their safety, as these conditions often create dangerous situations.
- 29. As a result of this discrimination and continuing systemic inaccessibility, persons who use wheelchairs or scooters, including but not limited to Plaintiff Denny, have been denied meaningful access to Defendant's pedestrian right of way, and have caused that pedestrian right of way to be systematically inaccessible to such persons when viewed in its entirety.

6

- 30. This discrimination and continuing systemic inaccessibility cause a real and immediate threat of current and continuing harm to persons who use wheelchairs or scooters for mobility within the City as represented by the harm caused to the Named Plaintiff Margaret Denny.
- 31. Named Plaintiff Margaret Denny is a long-time Colorado and Denver-area resident. She has lived in the Denver metro area since 1981, moved to Denver itself in 2004, and has been using a wheelchair for mobility since 2006. She has encountered numerous barriers to full and equal use of the pedestrian right of way in neighborhoods throughout the City, including in the area near the Mental Health Center of Denver and Rose Medical Center, and near the Yale light rail station by her home. Ms. Denny generally chooses routes where she knows there are fewer issues with curb ramps and is therefore deterred from freely using City's pedestrian right of way. Ms. Denny intends to continue to use the City's pedestrian right of way and will use it even more so once it becomes more accessible.
- 32. People who use wheelchairs or scooters for mobility, including but not limited to Named Plaintiff Denny, have in the past been denied, and in the absence of an injunction will in the future be denied, access to the City's pedestrian right of way by Defendant's violations complained of herein.

V. <u>CLASS ACTION ALLEGATIONS</u>

- 33. Plaintiff Denny brings this action on behalf of herself and, pursuant to Rule 23(b)(2) of the Colorado Rules of Civil Procedure, on behalf of a class defined as follows: all persons with disabilities who use wheelchairs or scooters for mobility who, through the date of preliminary approval of the Settlement Agreement, use or will use the pedestrian right of way in the City and County of Denver.
- 34. Each member of the class is a "qualified person with a disability" and/or a person with a "disability" pursuant to 42 U.S.C. § 12131(2) and Section 504. The persons in the class are so numerous that joinder of all such persons is impracticable because, without limitation, the class consists of numerous individuals -- census figures, for example, establish that there are approximately 33,000 individuals with ambulatory disabilities residing in the City and County of Denver -- and these individuals are very difficult to identify and unlikely to be able to bring individual suits.
- 35. There are numerous common questions of law and fact, including but not limited to:
 - a. Whether Defendant has violated Title II and Section 504 by failing to comply with the programmatic access requirement.
 - b. Whether Defendant has violated the new construction and alteration requirements of these statutes and their regulations.

- c. Whether Defended has violated the design requirement provisions of these statutes and their regulations.
- d. What types of roadwork has Defendant performed since the effective dates of Title II and Section 504.
- e. Whether this roadwork constituted "alterations" for purposes of Title II and Section 504.
- f. Whether Defendant has performed "new construction" within the meaning of Title II and Section 504.
- g. Whether Defendant has failed to make reasonable modifications in policies, procedures, and practices that are necessary to provide persons with mobility disabilities with meaningful, equal, and safe access to the Defendant's pedestrian right of way.
- h. Whether Defendant's violations result from deficient policies and practices.
- 36. The claims of Ms. Denny are typical of the claims of the class because they arise from the same course of conduct engaged in by Defendant, are based on the same alleged violations of the same statutes and regulations, and seek the same relief.
- 37. Ms. Denny will fairly and adequately represent the interests of the class. She has no interests adverse to the interests of other members of the class. Further, proposed class counsel have been appointed as class counsel in, and have successfully litigated, numerous disability rights class actions across the country.
- 38. Finally, certification under Rule 23(b)(2) is proper here because Defendant has acted or refused to act on grounds generally applicable to the class, thereby making appropriate final injunctive or declaratory relief with respect to the class as a whole.

VI. <u>CLAIMS FOR RELIEF</u>

FIRST CLAIM FOR RELIEF

Title II of the Americans with Disabilities Act of 1990 42 U.S.C. § 12101 et seq.

- 39. Plaintiff incorporates by reference each and every allegation herein.
- 40. Title II of the ADA provides in pertinent part: "[N]o qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such entity." 42 U.S.C. § 12132.
- 41. At all times relevant to this action, the City was and is a "public entity" within the meaning of Title II of the ADA and provides a pedestrian right of way program, service, or activity to the general public.

- 42. At all times relevant to this action, Plaintiff was and is a qualified individual with a disability within the meaning of Title II of the ADA and meets the essential eligibility requirements for the receipt of the services, programs, or activities of the City. 42 U.S.C. § 12131.
- 43. Defendant is mandated to operate each program, service, or activity "so that, when viewed in its entirety, it is readily accessible to and useable by individuals with disabilities." 28 C.F.R. § 35.150; see also 28 C.F.R. §§ 35.149. This requirement applies to all programs, services, and activities that a public entity offers, whether or not they are carried out in facilities that have been constructed or altered since January 26, 1992. Pedestrian rights of way themselves constitute a vital public program, service, or activity under Title II of the ADA. 28 C.F.R. § 35.104; Barden v. City of Sacramento, 292 F.3d 1073 (9th Cir. 2002).
- 44. Furthermore, the regulations implementing Title II of the ADA specifically provide that a public entity must install curb ramps at intersections whenever it newly constructs or alters sidewalks, streets, roads, and/or highways at any time after January 26, 1992 and must comply with Uniform Federal Accessibility Standards (UFAS) or with the Americans with Disabilities Act Accessibility Guidelines for Buildings and Facilities (ADAAG). 28 C.F.R. § 35.151. A street resurfacing project by a public entity is one example of an alteration under the meaning of the regulation. *Kinney v. Yerusalim*, 9 F.3d 1067, 1073-74 (3rd Cir. 1993); *Lonberg v. City of Riverside*, No. 97-CV-0237, 2007 WL 2005177, at * 6 (C.D. Cal. May 16, 2007).
- 45. The regulations implementing Title II of the ADA provide that a public entity must maintain the features of all facilities required to be accessible by the ADA. 28 C.F.R. § 35.133. Facilities required to be accessible include roads, walks, and passageways. 28 C.F.R. § 35.104.
- 46. Due to the lack of accessible curb ramps as alleged above, the City's pedestrian right of way is not fully, equally, or meaningfully accessible to Plaintiff when viewed in its entirety. Defendant has therefore violated the program access requirement applicable to pedestrian right of way facilities that have not been newly constructed or altered since January 26, 1992.
- 47. Additionally, the sidewalks, crosswalks, and other walkways at issue constitute facilities within the meaning of ADAAG and UFAS. Plaintiff is informed, believes, and thereon alleges that since January 26, 1992, Defendant has constructed, altered, or repaired parts of these facilities within the meaning of the ADAAG and the UFAS, and that Defendant, through its administrative methods, policies, and practices, has failed to make such facilities readily accessible to and usable by persons with disabilities through the construction and retrofit of curb ramps as required under federal accessibility standards and guidelines.
- 48. Plaintiff is informed, believes, and thereon alleges that since March 15, 2012, Defendant has constructed, altered, or repaired parts of these facilities within the meaning of the ADAAG and the UFAS, and that Defendant, through its administrative methods, policies, and

practices, has failed to make such facilities compliant with the ADAAG and the UFAS as updated in 2010, as required under 28 C.F.R. 35.151(c)(5).

- 49. Plaintiff is informed, believes, and thereon alleges that Defendant and its agents and employees have violated and continue to violate Title II of the ADA by failing to maintain the features of the City's walkways and curb ramps that are required to be accessible.
- 50. As a direct and proximate result of the aforementioned acts, Plaintiff has suffered and continued to suffer difficulty, hardship, anxiety, and danger, due to Defendant's failure to remediate missing, defective, or otherwise inaccessible curb ramps throughout the City's pedestrian right of way. Defendant's acts and omissions have denied and continue to deny Plaintiff the full, equal, and meaningful access to the pedestrian right of way that the ADA requires.
- 51. Because Defendant's discriminatory conduct presents a real and immediate threat of current and continuing future violations, declaratory and injunctive relief are appropriate remedies.
- 52. Named Plaintiff Denny and members of the proposed class have been denied, and in the absence of an injunction will be denied, full and equal access to the programs and services offered by Defendant in violation of Title II of the ADA.

SECOND CLAIM FOR RELIEF Section 504 of the Rehabilitation Act of 1973 29 U.S.C. § 794 et seq.

- 53. Plaintiff incorporates by reference each and every allegation herein.
- 54. Section 504 of the Rehabilitation Act of 1973 provides in pertinent part: "[N]o otherwise qualified individual with a disability . . . shall, solely by reason of her or his disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance" 29 U.S.C. § 794.
- 55. Plaintiff is otherwise qualified to participate in the services, programs, or activities that are provided to individuals in the City. *See* 29 U.S.C. § 794(b).
- 56. Defendant is a direct recipient of federal financial assistance sufficient to invoke the coverage of Section 504, and has received such federal financial assistance at all times relevant to the claims asserted in this Complaint.
- 57. All programs, services, and activities described herein are provided at or by facilities owned and/or maintained by Defendant, or are operated and/or administered by Defendant or its agents.

- 58. Defendant and its agents and employees have violated and continue to violate Section 504 and the regulations promulgated thereunder by excluding Plaintiff from participation in, denying Plaintiff the benefits of, and subjecting Plaintiff based solely by reason of her disability to, discrimination in the benefits and services of the City's pedestrian right of way and for the reasons set forth above.
- 59. Additionally, under Section 504, a recipient of federal financial assistance must install ADAAG- or UFAS-compliant curb ramps at intersections whenever it newly constructs or alters sidewalks, streets, roads, and/or highways at any time after June 3, 1977. Willits v. City of Los Angeles, 925 F. Supp. 2d. 1089, 1094 (C.D. Cal. 2013). Defendant has violated Section 504 by failing to construct or install such compliant curb ramps at intersections throughout the City where it has newly constructed or altered streets, roads, and/or highways since June 3, 1977.
- 60. As a direct and proximate result of the aforementioned acts, Plaintiff has suffered and continued to suffer difficulty, hardship, anxiety, and danger, due to Defendant's failure to remediate missing, defective, or otherwise inaccessible curb ramps throughout the City's pedestrian right of way. Defendant's acts and omissions have denied and continue to deny Plaintiff the full, equal, and meaningful access to the pedestrian right of way that Section 504 requires.
- 61. Because Defendant's discriminatory conduct presents a real and immediate threat of current and continuing future violations, declaratory and injunctive relief are appropriate remedies.
- 62. Named Plaintiff Denny and members of the proposed class have been denied, and in the absence of an injunction will be denied, full and equal access to the programs and services offered by Defendant in violation of Section 504.

VII. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests judgment as follows:

- 1. A declaration that Defendant's conduct as alleged here has violated, and continues to violate, Title II of the Americans with Disabilities Act of 1990, Section 504, and the regulations promulgated under those statutes;
- 2. Issuance of a permanent injunction requiring Defendant to undertake measures to remediate Defendant's past and ongoing violations of Title II of the ADA and Section 504 of the Rehabilitation Act, and the regulations promulgated under those statutes, and to ensure that such violations do not occur in the future;
- 3. Actual and compensatory damages to Named Plaintiff Margaret Denny, including, but not limited to those for future pecuniary and non-pecuniary losses, emotional pain,

11

suffering, inconvenience, mental anguish, loss of enjoyment of life, and other non-pecuniary losses;

- 4. Award Plaintiff reasonable attorneys' fees and costs, as provided by law;
- 5. Such other relief as the Court finds just and proper.

Respectfully submitted this 25th day of January, 2016.

/s/ Timothy P. Fox

Timothy P. Fox Civil Rights Education and Enforcement Center

Kevin W. Williams Colorado Cross-Disability Coalition

Attorneys for Plaintiff and the Proposed Class

Pursuant to C.R.C.P. 121, § 1-26(7), a printable copy of this document with electronic signatures is maintained in the offices of CREEC, 104 Broadway, Suite 400, Denver, CO 80203 and will be made available for inspection by other parties or the Court upon request.

Appendix 1

Chart 1

Street 1 of intersection	Street 2 of intersection	Violation Type	Corner
Ash Street	E. 25th Avenue	No Ramp	NE
Ash Street	E. 25th Avenue	No Ramp	NW
Ash Street	E. 25th Avenue	No Ramp	SE
Ash Street	E. 25th Avenue	No Ramp	SW
Ash Street	E. 26th Avenue	No Ramp	SW
Ash Street	E. 26th Avenue	No Ramp	SE
Bellaire Street	E. 25th Avenue	No Ramp	NE
Bellaire Street	E. 25th Avenue	No Ramp	NW
Bellaire Street	E. 26th Avenue	No Ramp	SE
Bellaire Street	E. 26th Avenue	No Ramp	SW
Belliare Street	E. 25th Avenue	No Ramp	SE
Birch Street	E. 26th Avenue	One Ramp	SW
Cherry Street	E. 28th Avenue	No Ramp	NE
Cherry Street	E. 28th Avenue	No Ramp	NW
Cherry Street	E. 28th Avenue	No Ramp	SE
Cherry Street	E. 28th Avenue	No Ramp	SW
Clarkson Street	E. 24th Avenue	One Ramp	NW
Clermont Street	E. 26th Avenue	No Ramp	NE
Clermont Street	E. 26th Avenue	No Ramp	NW
Clermont Street	E. 26th Avenue	No Ramp	SE
Clermont Street	E. 26th Avenue	No Ramp	SW
Clermont Street	E. 28th Avenue	No Ramp	NE
Clermont Street	E. 28th Avenue	No Ramp	NW
Clermont Street	E. 28th Avenue	No Ramp	SE
Clermont Street	E. 28th Avenue	No Ramp	SW
Clermont Street	E. 30th Avenue	No Ramp	NE
Clermont Street	E. 30th Avenue	No Ramp	NW
Clermont Street	E. 30th Avenue	No Ramp	SE
Clermont Street	E. 30th Avenue	No Ramp	SW
Dahlia Street	E. 26th Avenue	No Ramp	NE
Dahlia Street	E. 26th Avenue	No Ramp	NW
Dexter Street	E. 28th Avenue	No Ramp	NE
Dexter Street	E. 28th Avenue	No Ramp	NW
Dexter Street	E. 28th Avenue	No Ramp	SE
Dexter Street	E. 28th Avenue	No Ramp	SW
Elati Street	W. 7th Avenue	No Ramp	SE
Elati Street	W. 7th Avenue	No Ramp	NE
Elati Street	W. 7th Avenue	No Ramp	NW
Elati Street	W. 7th Avenue	One Ramp	SW
Emerson Street	E. 24th Avenue	One Ramp	SE
High Street	E. 24th Avenue	No Ramp	SE
High Street	E. 24th Avenue	One Ramp	SW
High Street	E. 25th Avenue	No Ramp	NE
High Street	E. 25th Avenue	No Ramp	NW
Humboldt Street	E. 10th Avenue	No Ramp	NE

Street 1 of interception	Street 2 of intersection	Violation Type	Cornor
Humboldt Street	E. 10th Avenue	No Ramp	NW
Humboldt Street	E. 10th Avenue	•	SE
Humboldt Street	E. 10th Avenue	No Ramp	SW
Inca Street		No Ramp	
	W. 6th Avenue	One Ramp	NE NA/
Julian Street	W. 42nd Avenue	No Ramp	NW
Julian Street	W. 42nd Avenue	No Ramp	SE
King Street	W. 39th Avenue	No Ramp	NE NNA/
King Street	W. 39th Avenue	No Ramp	NW
King Street	W. 39th Avenue	No Ramp	SE
King Street	W. 39th Avenue	No Ramp	SW
King Street	W. 40th Avenue	No Ramp	NW
King Street	W. 40th Avenue	No Ramp	SW
King Street	W. 42nd Avenue	No Ramp	NE
King Street	W. 42nd Avenue	No Ramp	SE
King Street	W. 42nd Avenue	No Ramp	NW
King Street	W. 42nd Avenue	No Ramp	SW
Knox Court	W. 42nd Avenue	No Ramp	NE
Knox Court	W. 42nd Avenue	No Ramp	NW
Knox Court	W. 42nd Avenue	No Ramp	SE
Lafayette Street	E. 10th Avenue	One Ramp	NW
Lafayette Street	E. 10th Avenue	One Ramp	NE
Lafayette Street	E. 10th Avenue	One Ramp	SW
Lincoln Street	E. 43rd Avenue	No Ramp	NE
Lincoln Street	E. 43rd Avenue	No Ramp	SE
Marion Street	E. 10th Avenue	No Ramp	NW
Marion Street	E. 10th Avenue	No Ramp	NE
Ogden Street	E. Ellsworth Avenue	No Ramp	NE
Ogden Street	E. Ellsworth Avenue	No Ramp	SE
Pearl Street	E. 11th Avenue	No Ramp	NE
Pearl Street	E. 11th Avenue	No Ramp	SE
Pearl Street	E. 11th Avenue	No Ramp	NW
Pearl Street	E. 11th Avenue	No Ramp	SW
Pearl Street	E. 1st Avenue	No Ramp	NE
Pearl Street	E. 1st Avenue	No Ramp	SE
Pearl Street	E. 1st Avenue	No Ramp	SW
Pennsylvania Street	E. 1st Avenue	No Ramp	NW
Pennsylvania Street	E. 1st Avenue	No Ramp	NE
Pennsylvania Street	E. 1st Avenue	No Ramp	SE
Pennsylvania Street	E. 2nd Avenue	No Ramp	SW
Pennsylvania Street	E. 2nd Avenue	No Ramp	SE
Pennsylvania Street	E. 2nd Avenue	No Ramp	NW
Race Street	E. 24th Avenue	One Ramp	SE
S Humboldt Street	E. Colorado Avenue	No Ramp	NE
S. Adams Street	E. Harvard Avenue	No Ramp	NE
S. Adams Street	E. Harvard Avenue	No Ramp	SE
S. Adams Street	E. Harvard Avenue	No Ramp	NW
S. Adams Street	E. Harvard Avenue	No Ramp	SW
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S. Adams Street	E. Vassar Avenue	No Ramp	NE
S. Adams Street	E. Vassar Avenue	No Ramp	SE
S. Adams Street	E. Vassar Avenue	No Ramp	NW
S. Adams Street	E. Vassar Avenue	No Ramp	SW
S. Alcott Street	W. Center Avenue	No Ramp	NE
S. Alcott Street	W. Center Avenue	No Ramp	SE
S. Alcott Street	W. Center Avenue	No Ramp	NW
S. Alcott Street	W. Center Avenue	No Ramp	SW
S. Alcott Street	W. Dakota Street	No Ramp	SE
S. Alcott Street	W. Dakota Street	No Ramp	NE
S. Alcott Street	W. Exposition Avenue	No Ramp	NE
S. Alcott Street	W. Exposition Avenue	No Ramp	SE
S. Alcott Street	W. Exposition Avenue	No Ramp	NW
S. Alcott Street	W. Exposition Avenue	No Ramp	SW
S. Alcott Street	W. Virginia Avenue	No Ramp	NE
S. Alcott Street	W. Virginia Avenue	No Ramp	SE
S. Alcott Street	W. Virginia Avenue	No Ramp	NW
S. Alcott Street	W. Virginia Avenue	No Ramp	SW
S. Bryant Street	W. Center Avenue	No Ramp	NE
S. Bryant Street	W. Center Avenue	No Ramp	SE
S. Bryant Street	W. Center Avenue	No Ramp	NW
S. Bryant Street	W. Center Avenue	No Ramp	SW
S. Bryant Street	W. Exposition Avenue	No Ramp	NE
S. Bryant Street	W. Exposition Avenue	No Ramp	SE
S. Bryant Street	W. Exposition Avenue	No Ramp	NW
S. Bryant Street	W. Exposition Avenue	No Ramp	SW
S. Canosa Court	W. Center Avenue	No Ramp	NE
S. Canosa Court	W. Center Avenue	No Ramp	SE
S. Canosa Court	W. Center Avenue	No Ramp	NW
S. Canosa Court	W. Center Avenue	No Ramp	SE
S. Canosa Court	W. Exposition Avenue	No Ramp	NE
S. Canosa Court	W. Exposition Avenue	No Ramp	SE
S. Canosa Court	W. Exposition Avenue	No Ramp	NW
S. Canosa Court	W. Exposition Avenue	No Ramp	SW
S. Canosa Court	W. Virginia Avenue	No Ramp	NE
S. Canosa Court	W. Virginia Avenue	No Ramp	SE
S. Canosa Court	W. Virginia Avenue	No Ramp	NW
S. Canosa Court	W. Virginia Avenue	No Ramp	SW
S. Clarkson Street	E. Ellsworth Avenue	No Ramp	NE
S. Clarkson Street	E. Ellsworth Avenue	No Ramp	NW
S. Clarkson Street	E. Ellsworth Avenue	No Ramp	SE
S. Clarkson Street	E. Ellsworth Avenue	No Ramp	SW
S. Clay Street	W. Center Avenue	No Ramp	NE
S. Clay Street	W. Center Avenue	No Ramp	SE
S. Clay Street	W. Center Avenue	No Ramp	SW
S. Clay Street	W. Center Avenue	No Ramp	NW
S. Clay Street	W. Exposition Avenue	No Ramp	NE

S. Clay Street	W. Exposition Avenue	No Ramp	NW
S. Clay Street W. Virginia Avenue		No Ramp	NE
S. Clay Street	W. Virginia Avenue	No Ramp	SE
S. Clayton Street	E. Harvard Avenue	No Ramp	SE
S. Columbine Street	E. Asbury Avenue	One Ramp	NE
S. Columbine Street	E. Iliff Avenue	No Ramp	NE
S. Columbine Street	E. Iliff Avenue	No Ramp	SE
S. Columbine Street	E. Iliff Avenue	No Ramp	NW
S. Columbine Street	E. Iliff Avenue	No Ramp	SW
S. Columbine Street	E. Vassar Avenue	No Ramp	SW
S. Columbine Street	E. Wesley Avenue	No Ramp	NE
S. Columbine Street	E. Wesley Avenue	No Ramp	NW
S. Cook Street	E. Harvard Avenue	No Ramp	NE
S. Cook Street	E. Harvard Avenue	No Ramp	SE
S. Cook Street	E. Harvard Avenue	No Ramp	NW
S. Cook Street	E. Harvard Avenue	No Ramp	SW
S. Cook Street	E. Vassar Avenue	No Ramp	NW
S. Cook Street	E. Vassar Avenue	No Ramp	SW
S. Cook Street	E. Vassar Avenue	No Ramp	NW
S. Cook Street	E. Vassar Avenue	No Ramp	SW
S. Cook Street	E. Wesley Avenue	No Ramp	NE
S. Cook Street	E. Wesley Avenue	No Ramp	SE
S. Cook Street	E. Wesley Avenue	No Ramp	NW
S. Cook Street	E. Wesley Avenue	No Ramp	SW
S. Dale Court	W. Center Avenue	No Ramp	NE
S. Dale Court	W. Center Avenue	No Ramp	NW
S. Dale Court	W. Center Avenue	No Ramp	SW
S. Dale Court	W. Exposition Avenue	No Ramp	NE
S. Dale Court	W. Exposition Avenue	No Ramp	SE
S. Dale Court	W. Exposition Avenue	No Ramp	NW
S. Dale Court	W. Exposition Avenue	No Ramp	SW
S. Dale Court	W. Virginia Avenue	No Ramp	NE
S. Dale Court	W. Virginia Avenue	No Ramp	SE
S. Decatur Street	W. Center Avenue	No Ramp	NE
S. Decatur Street	W. Center Avenue	No Ramp	SE
S. Decatur Street	W. Center Avenue	No Ramp	NW
S. Decatur Street	W. Center Avenue	No Ramp	SW
S. Decatur Street	W. Exposition Avenue	No Ramp	NE
S. Decatur Street	W. Exposition Avenue	No Ramp	SW
S. Decatur Street	W. Virginia Avenue	No Ramp	NE
S. Eliot Street	W. Exposition Avenue	No Ramp	NE
S. Eliot Street	W. Virginia Avenue	No Ramp	NE
S. Eliot Street	W. Virginia Avenue	No Ramp	SE
S. Emerson Street	E. Bayaud Avenue	No Ramp	NE
S. Emerson Street	E. Bayaud Avenue	No Ramp	SW
S. Emerson Street	E. Bayaud Avenue	No Ramp	NW
S. Emerson Street	E. Cedar Avenue	No Ramp	NE

ieet i oi iiitei sectioni	Street 2 of litter section	violation Type	COLLIC
S. Emerson Street	E. Cedar Avenue	No Ramp	SE
S. Emerson Street	E. Cedar Avenue	No Ramp	NW
S. Emerson Street	E. Cedar Avenue	No Ramp	SW
S. Emerson Street	E. Ellsworth Avenue	No Ramp	NE
S. Emerson Street	E. Ellsworth Avenue	No Ramp	NW
S. Emerson Street	E. Ellsworth Avenue	No Ramp	SW
S. Emerson Street	E. Ellsworth Avenue	No Ramp	SE
S. Fillmore Street	E. Wesley Avenue	No Ramp	NW
S. Franklin Street	E. Asbury Avenue	No Ramp	NE
S. Franklin Street	E. Asbury Avenue	No Ramp	SE
S. Franklin Street	E. Asbury Avenue	No Ramp	NW
S. Franklin Street	E. Asbury Avenue	No Ramp	SW
S. Franklin Street	E. Colorado Avenue	No Ramp	NE
S. Franklin Street	E. Colorado Avenue	No Ramp	NW
S. Franklin Street	E. Colorado Avenue	One Ramp	SE
S. Franklin Street	E. Jewell Avenue	No Ramp	NE
S. Franklin Street	E. Jewell Avenue	No Ramp	SE
S. Franklin Street	E. Jewell Avenue	No Ramp	NW
S. Franklin Street	E. Jewell Avenue	No Ramp	SW
S. Gilpin Street	E. Asbury Avenue	No Ramp	NE
S. Gilpin Street	E. Asbury Avenue	No Ramp	SE
S. Gilpin Street	E. Colorado Avenue	No Ramp	NE
S. Gilpin Street	E. Colorado Avenue	No Ramp	SE
S. Gilpin Street	E. Colorado Avenue	No Ramp	NW
S. Gilpin Street	E. Colorado Avenue	No Ramp	SW
S. Gilpin Street	E. Jewell Avenue	No Ramp	NW
S. Gilpin Street	E. Jewell Avenue	No Ramp	SE
S. Gilpin Street	E. Jewell Avenue	No Ramp	SW
S. Humboldt Street	E. Asbury Avenue	One Ramp	NE
S. Humboldt Street	E. Asbury Avenue	One Ramp	SE
S. Humboldt Street	E. Asbury Avenue	One Ramp	NW
S. Humboldt Street	E. Asbury Avenue	One Ramp	SW
S. Humboldt Street	E. Colorado Avenue	No Ramp	SE
S. Humboldt Street	E. Colorado Avenue	No Ramp	NW
S. Humboldt Street	E. Jewell Avenue	No Ramp	NE
S. Humboldt Street	E. Jewell Avenue	No Ramp	SE
S. Humboldt Street	E. Jewell Avenue	No Ramp	NW
S. Humboldt Street	E. Jewell Avenue	No Ramp	SW
S. Josephine Street	E. Iliff Avenue	No Ramp	NE
S. Josephine Street	E. Iliff Avenue	No Ramp	SW
S. Josephine Street	E. Vassar Avenue	No Ramp	SW
S. Josephine Street	E. Wesley Avenue	No Ramp	NW
S. Josephine Street	E. Wesley Avenue	No Ramp	SW
S. Josephine Street	E. Iliff Avenue	No Ramp	SE
S. Lafayette Street	E. Colorado Avenue	No Ramp	NE
S. Lafayette Street	E. Colorado Avenue	No Ramp	NW
S. Lafayette Street	E. Colorado Avenue	No Ramp	SW
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Ju	eet i oi iiitei sectioii	Street 2 of litter section	violation Type	COLLIC
	S. Lafayette Street	E. Jewell Avenue	No Ramp	NE
	S. Lafayette Street	E. Jewell Avenue	No Ramp	SE
	S. Lafayette Street	E. Jewell Avenue	No Ramp	NW
	S. Lafayette Street	E. Jewell Avenue	No Ramp	SW
	S. Lafayette Street	E. Mexico Avenue	No Ramp	NE
	S. Lafayette Street	E. Mexico Avenue	No Ramp	SE
	S. Lafayette Street	E. Mexico Avenue	No Ramp	NW
	S. Lafayette Street	E. Mexico Avenue	No Ramp	SW
	S. Madison Street	E. Iliff Avenue	One Ramp	NE
	S. Madison Street	E. Iliff Avenue	One Ramp	NW
	S. Madison Street	E. Iliff Avenue	No Ramp	SE
	S. Madison Street	E. Iliff Avenue	No Ramp	SW
	S. Madison Street	E. Vassar Avenue	No Ramp	NE
	S. Madison Street	E. Vassar Avenue	No Ramp	SE
	S. Madison Street	E. Vassar Avenue	No Ramp	NW
	S. Madison Street	E. Vassar Avenue	No Ramp	SW
	S. Madison Street	E. Wesley Avenue	No Ramp	NE
	S. Madison Street	E. Wesley Avenue	No Ramp	SE
	S. Madison Street	E. Wesley Avenue	No Ramp	NW
	S. Madison Street	E. Wesley Avenue	No Ramp	SW
	S. Marion Street	E. Colorado Avenue	No Ramp	SW
	S. Marion Street	E. Colorado Avenue	One Ramp	SE
	S. Marion Street	E. Colorado Avenue	One Ramp	NW
	S. Marion Street	E. Colorado Avenue	One Ramp	NE
	S. Marion Street	E. Mexico Avenue	No Ramp	NE
	S. Marion Street	E. Mexico Avenue	No Ramp	SE
	S. Marion Street	E. Mexico Avenue	No Ramp	NW
	S. Marion Street	E. Mexico Avenue	No Ramp	SW
	S. Milwaukee Street	E. Harvard Avenue	One Ramp	SE
	S. Monroe Street	E. Harvard Avenue	No Ramp	NE
	S. Monroe Street	E. Harvard Avenue	No Ramp	SE
	S. Monroe Street	E. Harvard Avenue	No Ramp	SW
	S. Monroe Street	E. Wesley Avenue	No Ramp	NE
	S. Monroe Street	E. Wesley Avenue	No Ramp	SE
	S. Monroe Street	E. Wesley Avenue	No Ramp	NW
	S. Monroe Street	E. Wesley Avenue	No Ramp	SW
	S. Pearl Street	E. Ellsworth Avenue	No Ramp	NE
	S. Pearl Street	E. Ellsworth Avenue	No Ramp	NW
S	. Pennsylvania Street	E. Bayaud Avenue	No Ramp	NE
S	. Pennsylvania Street	E. Bayaud Avenue	No Ramp	NW
S	. Pennsylvania Street	E. Bayaud Avenue	No Ramp	SE
S	. Pennsylvania Street	E. Bayaud Avenue	No Ramp	SW
	. Pennsylvania Street	E. Cedar Avenue	No Ramp	NE
S	. Pennsylvania Street	E. Cedar Avenue	No Ramp	NW
	. Pennsylvania Street	E. Cedar Avenue	No Ramp	SW
S	. Pennsylvania Street	E. Ellsworth Avenue	No Ramp	NE
S	. Pennsylvania Street	E. Ellsworth Avenue	No Ramp	NW

S. St. Paul Street	E. Vassar Avenue	No Ramp	NW
S. St. Paul Street	E. Vassar Avenue	No Ramp	SE
S. St. Paul Street	E. Vassar Avenue	No Ramp	SW
S. Washington Street	E. Cedar Avenue	No Ramp	NE
S. Washington Street	E. Cedar Avenue	No Ramp	NW
S. Washington Street	E. Cedar Avenue	No Ramp	SE
S. Washington Street	E. Cedar Avenue	No Ramp	SW
S. Washington Street	E. Ellsworth Avenue	No Ramp	NE
S. Washington Street	E. Ellsworth Avenue	No Ramp	NW
S. Washington Street	E. Ellsworth Avenue	One Ramp	SE
S. Washington Street	E. Ellsworth Avenue	One Ramp	SW
S. Wiliams Street	E. Asbury Avenue	No Ramp	NE
S. Williams Street	E. Asbury Avenue	No Ramp	NW
S. Williams Street	E. Asbury Avenue	No Ramp	SW
S. Williams Street	E. Colorado Avenue	One Ramp	SW
S. Williams Street	E. Colorado Avenue	One Ramp	NW
S. Williams Street	E. Jewell Avenue	No Ramp	NE
S. Williams Street	E. Jewell Avenue	No Ramp	NW
S. Williams Street	E. Jewell Avenue	No Ramp	SW
S. Williams Street	E. Jewell Avenue	No Ramp	SE
S. Zuni Street	W. Exposition Avenue	No Ramp	NE
S. Zuni Street	W. Exposition Avenue	No Ramp	SE
S. Zuni Street	W. Exposition Avenue	No Ramp	NW
S. Zuni Street	W. Exposition Avenue	No Ramp	SW
Uinta Street	E. 19th Avenue	No Ramp	NE
Ulster Street	E. 16th Avenue	No Ramp	NE
Ulster Street	E. 16th Avenue	No Ramp	NW
Ulster Street	E. 16th Avenue	No Ramp	SW
Ulster Street	E. 16th Avenue	One Ramp	SE
Ulster Street	E. 19th Avenue	No Ramp	SE
Ulster Street	E. 19th Avenue	No Ramp	SW
Valentia Street	E. 17th Avenue	No Ramp	NE
Valentia Street	E. 17th Avenue	No Ramp	SE
Valentia Street	E. 19th Avenue	No Ramp	NE
Valentia Street	E. 19th Avenue	No Ramp	NW
Valentia Street	E. 19th Avenue	No Ramp	SE
Valentia Street	E. 19th Avenue	No Ramp	SW
Verbena Street	E. 16th Avenue	No Ramp	NE
Verbena Street	E. 16th Avenue	No Ramp	NW
Verbena Street	E. 16th Avenue	No Ramp	SE
Verbena Street	E. 16th Avenue	No Ramp	SW
Verbena Street	E. 17th Avenue	No Ramp	NE
Verbena Street	E. 17th Avenue	No Ramp	NW
Verbena Street	E. 19th Avenue	No Ramp	NE
Wabash Street	E. 16th Avenue	No Ramp	NE
Wabash Street	E. 16th Avenue	No Ramp	NW
Wabash Street	E. 16th Avenue	No Ramp	SE

cet i di lillei sectioni	Street 2 of litter section	violation Type	COLLIC
Wabash Street	E. 16th Avenue	No Ramp	SW
Wabash Street	E. 17th Avenue	No Ramp	NW
Wabash Street	E. 17th Avenue	No Ramp	NE
Wabash Street	E. 19th Avenue	No Ramp	NE
Wabash Street	E. 19th Avenue	No Ramp	NW
Willow Street	E. 17th Avenue	No Ramp	NE
Willow Street	E. 17th Avenue	No Ramp	NW
Willow Street	E. 19th Avenue	No Ramp	NE
Willow Street	E. 19th Avenue	No Ramp	NW
Xanthia Street	E. 17th Avenue	No Ramp	NE
Xanthia Street	E. 17th Avenue	No Ramp	NW
Xanthia Street	E. 17th Avenue	No Ramp	SE
Xanthia Street	E. 17th Avenue	No Ramp	SW
Xanthia Street	E. 19th Avenue	No Ramp	NE
Xanthia Street	E. 19th Avenue	No Ramp	NW
Xenia Street	E. 17th Avenue	No Ramp	NE
Xenia Street	E. 17th Avenue	No Ramp	SE
Xenia Street	E. 17th Avenue	No Ramp	SW
Xenia Street	E. 19th Avenue	No Ramp	NE
Xenia Street	E. 19th Avenue	No Ramp	NW
Xenia Street	E. 19th Avenue	No Ramp	SE
Xenia Street	E. 17th Avenue	No Ramp	NW

Appendix 2

Street 1 of intersection	Street 2 of intersection	Corner of Intersection	Running Slope Cross Slope
Marion Street	E. 12th Avenue	SE	7.80%
Franklin Street	E. 16th Avenue	NW	10.10%
Franklin Street	E. 16th Avenue	NW	10.10%
York Street	E. 16th Avenue	NW	10.10%
Oneida Street	E. 12th Avenue	SW	10.10%
Glencoe Street	E. 12th Avenue	NE	10.10%
Monroe Street	E. 12th Avenue	NE	10.10%
Lafayette Street	E. 12th Avenue	SE	10.10%
Humboldt Street	E. 12th Avenue	SE	10.10%
Garfield Street	E. 12th Avenue	SE	10.20%
Humboldt Street	E. 12th Avenue	SW	10.20%
Humboldt Street	E. 12th Avenue	SW	10.20%
Jospehine Street	E. 16th Avenue	SE	10.20%
Albion Street	28th Avenue	NE	10.30%
Ash Street	28th Avenue	SW	10.30%
Clarkson Street	E. 24th Avenue	SW	10.30%
Ash Street	28th Avenue	NE	10.30%
High Street	E. 16th Avenue	SE	10.30%
Monroe Street	E. 12th Avenue	NW	10.40%
Monroe Street	E. 12th Avenue	SW	10.50%
Jackson Street	E. 12th Avenue	SE	10.50%
Emerson Street	E. 24th Avenue	NE	10.50%
Franklin Street	E. 16th Avenue	NE	10.60%
York Street	E. 16th Avenue	SE	10.60%
Marion Street	E. 12th Avenue	NE	10.70%
Lafayette Street	E. 4th Avenue	SE	10.70%
Glencoe Street	E. 12th Avenue	NE	10.80%
Humboldt Street	E. 12th Avenue	SE	10.80%
Albion Street	28th Avenue	SW	10.80%
Lafayette Street	E. 4th Avenue	NE	10.90%
High Street	E. 16th Avenue	NW	10.90%
Valentia Street	E. 17th Avenue	NW	11.00%
Emerson Street	E. 25th Avenue	SW	11.00%
Glencoe Street	E. 11th Avenue	NW	11.10%
Emerson Street	E. 25th Avenue	SW	11.10%
York Street	E. 16th Avenue	SE	11.20%
High Street	E. 16th Avenue	SW	11.40%
Vine Street	E. 16th Avenue	NW	11.40%
Williams Street	E. 16th Avenue	SE	11.50%
Glencoe Street	E. 11th Avenue	SW	11.50%
Glencoe Street	E. 11th Avenue	NE	11.60%
Valentia Street	E. 17th Avenue	SW	11.70%
Garfield Street	E. 12th Avenue	SE	11.80%

Street 1 of	Street 2 of	Corner of		
intersection	intersection	Intersection	Running Slope	Cross Slope
Ogden Street	E. 25th Avenue	NW	11.80%	
Vine Street	E. 16th Avenue	SE	11.80%	
York Street	E. 16th Avenue	SW	11.80%	
Ogden Street	E. 24th Avenue	SW	11.90%	
High Street	E. 16th Avenue	NE	12.00%	
Race Street	E. 16th Avenue	SE	12.00%	
Vine Street	E. 16th Avenue	SE	12.00%	
Glencoe Street	E. 11th Avenue	NE	12.00%	
Gilpin Street	E. 16th Avenue	SE	12.10%	
Vine Street	E. 16th Avenue	SW	12.10%	
Emerson Street	E. 25th Avenue	SE	12.10%	
Birch Street	28th Avenue	SE	12.20%	
Gaylord Street	E. 16th Avenue	SW	12.20%	
Gaylord Street	E. 16th Avenue	SW	12.20%	
Glencoe Street	E. 12th Avenue	SW	12.30%	
Franklin Street	E. 16th Avenue	SE	12.40%	
Emerson Street	E. 24th Avenue	NE	12.50%	
Lafayette Street	E. 4th Avenue	SE	12.60%	
Williams Street	E. 16th Avenue	SW	12.70%	
York Street	E. 16th Avenue	SW	12.80%	
Birch Street	E. 25th Avenue	NE	12.90%	
Race Street	E. 16th Avenue	SE	12.90%	3.10%
High Street	E. 16th Avenue	SW	13.00%	
Race Street	E. 16th Avenue	NE	13.10%	
Vine Street	E. 16th Avenue	SW	13.10%	
Clarkson Street	E. 24th Avenue	SE	13.10%	5.10%
Clarkson Street	E. 25th Avenue	SE	13.10%	6.10%
Emerson Street	E. 24th Avenue	NW	13.10%	
Emerson Street	E. 24th Avenue	SE	13.20%	
Ogden Street	E. 24th Avenue	SE	13.20%	
Glencoe Street	E. 12th Avenue	SE	13.50%	2.400/
Franklin Street	E. 16th Avenue	SW	13.70%	3.10%
Gaylord Street	E. 16th Avenue	SE	14.00%	
Emerson Street	E. 24th Avenue	SW	14.10%	
Oneida Street	E. 12th Avenue	NW	14.20%	
Clarkson Street	E. 25th Avenue	SW	14.20%	
Monroe Street	E. 12th Avenue	SE	14.30%	
Vine Street	E. 16th Avenue	NW	14.30%	
Birch Street	E. 25th Avenue	NE	14.40%	
Clarkson Street	E. 24th Avenue	NW	14.40%	
Ogden Street	E. 24th Avenue	SE	14.60%	
Ogden Street	E. 24th Avenue	SW	15.00%	
Emerson Street	E. 24th Avenue	SE	15.50%	
Emerson Street	E. 25th Avenue	SE	15.60%	
Ogden Street	E. 25th Avenue	NE	15.80%	

Street 1 of intersection	Street 2 of intersection	Corner of Intersection	Running Slope Cross Slope
Ogden Street	E. 25th Avenue	NE	16.10%
Clarkson Street	E. 24th Avenue	NE	17.30%
Franklin Street	E. 16th Avenue	SW	18.30%
Emerson Street	E. 24th Avenue	SW	18.50%
Clarkson Street	E. 24th Avenue	NE	20.30%

Appendix 3







