

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

SHAUNA M. MOTE, et al,

File No. 2:16-cv-11546-DML-EAS

Plaintiffs,

Honorable David M. Lawson

v

Elizabeth A. Stafford

CITY OF CHELSEA, et al,

Magistrate Judge

Defendants.

CLASS ACTION

CITY OF CHELSEA,

Third Party Plaintiff,

v

WASHTENAW COUNTY ROAD COMMISSION,

Third Party Defendant.

CITY OF CHELSEA SECOND ANNUAL REPORT

The City of Chelsea, Defendant, submits its Second Annual Report as required by § VII of the First Consent Decree entered on August 4, 2017 (Doc # 87).

I. PART ONE - Recap

The First Annual Report filed in 2018 consisted of two (2) parts: (1) a map indicating roadways within the City of Chelsea where abutting curb ramps were constructed or altered by, on behalf of, or for the use of the City of Chelsea

between 1992 May 2018. All facilities constructed or altered prior to 2007 were assumed to be out of compliance, were not inspected or inventoried; and (2) diagrams of each curb ramp and lists measurements and observations recorded during the inspection. The City intends to remedy all instances of non-compliance according to a mutually-agreeable plan negotiated with Plaintiffs that will be set forth in a second consent decree.

II. PART TWO – New Developments.

- A. “Palmer Lot”: In 2019 the City of Chelsea completed the development of a public gathering space and bathroom facilities on South Main Street known as the “Palmer Lot”. The area is approximately one and one-quarter [1.25] acres in size. To the best of the City’s knowledge and belief all facilities are ADA compliant. However, measurements have been delayed due on-going site improvements. These will be taken, certified, and filed with the Court in a supplemental report, accompanied by an electronic accessible set of plans with date and results of measurements of the improvements.
- B. No other construction projects triggering ADA compliance were initiated or completed between the date of the First Annual Report and the date of this Second Annual Report.
- C. In the current fiscal year, the City
 - 1. is seeking grants to re-pave Wellington and Lane streets, during which

construction all curb ramps along said streets situated outside the Washtenaw County Road Commission right of way will be replaced with ramps built in accordance with the MDOT R-28 standard applicable at the time of construction, in co-ordination with and subject to the Washtenaw County Road Commission requirements for matching alignments and other standards.

2. intends to reconstruct sidewalks with ADA compliant ramps on Freer Road between the two [2] entrances to the Church of Jesus Christ of Latter Day Saints parking lot, during in accordance with the MDOT R-28 standard applicable at the time of construction.

Respectfully Submitted,

KEUSCH, FLINTOFT & FINK, PLLC,
Attorneys for the City of Chelsea, Defendant

BY: _____

PETER C. FLINTOFT (P13531)

119 South Main Street

Post Office Box 187

Chelsea, Michigan 48118

Telephone: (734) 475-8671

flintoft@keuschlaw.com

Dated: July 12, 2019

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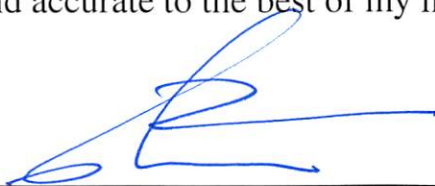
v

WASHTENAW COUNTY ROAD COMMISSION,

Third Party Defendant.

CERTIFICATION

I, Peter C. Flintoft, Attorney of the City of Chelsea, declare under penalty of perjury that I have read the Second Annual Report and certify that the information therein is true and accurate to the best of my information, knowledge, and belief.



Peter C. Flintoft

Dated: July 12, 2019