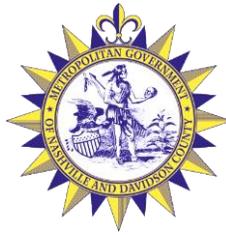


Metropolitan Government  
of Nashville and Davidson County

John Cooper, Mayor  
Nancy Whitemore, Director



Department of General Services

Richard H. Fulton Campus  
730 2<sup>nd</sup> Avenue South  
P.O. Box 196300  
Nashville, TN 37219-6300  
615-862-5050, 615-862-5035 (fax)

## **Transition Plan Review**

**And**

## **Procedures for Continued Compliance**

As the agreed settlement between the U.S. Department of Justice and Metro Government has ended it is important to have in place plans, procedures, and agreements that will ensure continued ADA compliance with existing programs, services, and activities as well as procedures to ensure newly constructed, altered, or renovated facilities are built in a manner that fully comply with the latest ADA standards.

The Americans with Disabilities Act (ADA) is a civil rights law that mandates equal opportunity for individuals with disabilities. The ADA prohibits discrimination in access to jobs, government services, public transportation, public accommodations, and telecommunications. There are five titles of the ADA including:

- Title I: Employment
- Title II: State and Local Government
- Title III: Public Accommodations and Commercial Facilities
- Title IV: Telecommunications Relay Services
- Title V: Miscellaneous Provisions

Metro is obligated to observe all requirements of Title I in its employment practices; Title II in its policies practices, services, programs, and activities; and any parts of Titles IV and V that may apply to Metro. Title III only covers businesses and non-profit service providers and is not applicable to Metro.

Title IV of the ADA requires that telephone companies provide telecommunication relay services that allow individuals with hearing or speech impairments to communicate using a teletypewriter (TTY) or another non-voice device. It also requires that all television public service announcements produced or funded in whole or in part by the Federal government include closed captioning. Title IV would not apply to Metro unless they are receiving funds from the Federal government for television service announcements.

Title V is a miscellaneous section. It includes provisions that do not allow the ADA to invalidate or override other laws (federal, state, and local) to provide equal or greater protections or remedies for people with disabilities. It includes exclusions of conditions from the definition of accessibility. Title V also includes protection of individuals who seek to exercise their rights, or who encourage others to do so, from retaliation, intimidation, coercion, threats or interference.

This document addresses the requirements of Title II of the ADA.

Metro Government is committed to comply with ADA standards.

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ADA Title II and Section 504 regulations require that Metropolitan Government operate each of its programs so that, when viewed in its entirety, the program is readily accessible to and usable by individuals with disabilities by:

- a. Delivering services, programs, and activities in alternate ways. This includes, for example, redesigning equipment and reassigning services to accessible locations as well as through the use of aides, home visits, or other methods of compliance or, if these methods are not effective in making the programs accessible,
- b. Making physical changes to buildings in accordance with the ADA Standards for Accessible Design.

Metro Government provides programs, activities, and services in hundreds of government buildings, educational facilities, parks, rights of ways, and school buildings.

Responsible Official

ADA Title II Coordinator

Jerry Hall

Department of General Services

ADA & Safety Services Manager

730 2<sup>nd</sup> Avenue South, Nashville, TN 37210

615-862-8960

jerry.hall@nashville.gov

Per 28 CFR 35.150(d)(3)(iv), Metro must identify an official responsible for implementation of the ADA Transition Plan (i.e., Executive Director, Secretary, Commissioner, Chief Engineer, etc.). The ADA Title II coordinator has been identified as being the responsible individual.

Metro Government will maintain an ADA Title II Coordinator. The ADA Title II Coordinator's specific responsibilities include, but are not limited to; drafting the notice and the grievance procedure, investigating grievances relating to Metropolitan Government's compliance with the statutes in its programs, services, and practices, facilitating effective communications, involving people with disabilities and other interested parties in the compliance process, overseeing Metropolitan Government's self-evaluation, and preparing its transition plan. This position is also responsible for managing the day-to-day operations of the ADA Compliance Division of the Department of General Services. This Division is responsible for monitoring compliance in all Metro programs, services, activities, and facilities.

History of Compliance Activities

Since self-reporting to the U.S. Department of Justice, Metro Government has been committed to compliance with the Americans with Disabilities Act (ADA). The city established the ADA Compliance Division which is part of the Department of General Services. Employees within this division perform functions necessary to ensure compliance with ADA standards. Employees in this division review plans for all construction projects being conducted on Metro owned or leased properties as well as conducting field

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inspections to verify work performed complies with ADA standards. There have been thousands of projects conducted in Nashville on Metro property since the initial DOJ agreement. These projects include everything from altering a door entry to make the building accessible to construction of the Music City Center, Nashville's 2.1 million square foot convention center. Everything, including but not limited to playgrounds, dog parks, ice rinks, schools, greenways, baseball stadiums, and special events are vetted for compliance. There are criteria within the ADA standards that dictate when a construction project will trigger ADA compliance but in many Metro facilities the city has been proactive and has performed projects whose sole purpose was to perform ADA upgrades.

In the year 2000 a settlement agreement concerning curb ramps, commonly referred to as the Uilla settlement, was reached. This settlement identified several sidewalks that lacked curb ramps to allow access by people with disabilities. The Metro Department of Public Works, which manages all right-of-way in the city of Nashville, began making necessary corrections to these locations. Public Works completed work on these identified curb ramps several years ago but has continued to perform rehab work to several miles of sidewalk which has enhanced access to many individuals. All new construction performed by Public Works or any entity performing work in the right-of-way ensure work is performed to established Public Works standards.

#### Request for Accommodation

A formal process for responding to requests for accommodation has been established and institutionalized by the Metropolitan Government. This process can be located on our web site

<https://www.nashville.gov/departments/general-services/ada-compliance/request-ada-accommodation>

#### Grievance Procedure

A formal grievance procedure has been written, adopted and implemented by the Metropolitan Government. This process can be located on our web site

<https://filetransfer.nashville.gov/portals/0/sitecontent/GeneralServices/docs/ADA-intake.pdf>

#### Project Review, Inspections, and Approval

All construction, alterations, rehabilitation projects being performed on Metro Government owned or leased properties or projects being funded with Metro money must be submitted to the ADA Compliance division for review, inspections, and final approval.

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The ADA Construction language must be on each set of plans submitted to the ADA Compliance Division. One set of stamped plans must remain on the construction site. Any changes to the approved plan must be submitted to and approved by the ADA Compliance Division before the changes are implemented.

Upon completion of a project a thorough inspection will be conducted to ensure compliance with ADA standards. Depending on the type of project a Final Use and Occupancy permit may be required. If all ADA issues have been corrected a Final U & O will be issued. If the project did not require a U & O approval of the project will be provided to the department responsible for the project.

#### ADA Construction Language

All construction activities shall be completed in full compliance with the Americans with Disabilities Act (ADA), 2010 ADA Standards for Accessible Design, which has been adopted by Metro.

#### **Metro Contracts**

All contracts executed with vendors, providers, contractors, etc., to provide services for Metro must ensure their service is in compliance with all ADA standards. Language is included in all contracts ensure acknowledgment from the provider that they will perform all functions in a manner that meets ADA standards.

#### ADA Contract Language

The contractor shall assure to Metro that all services provided under the construction contract shall be completed in full compliance with the Americans with Disabilities Act ("ADA"), 2010 ADA Standards for Accessible Design.

#### Changes to ADA Standards or Adoption of Regulations

In the event ADA standards are adopted by the U.S. Department of Justice or Metro adopts regulations that meet and exceed ADA standards the ADA Title II Coordinator will immediately notify the Metro Finance Purchasing division to alert them of the change and have contract language changed on all contracts executed from that point forward.

#### Accessible Programs, Services, and Activities

As mentioned previously ADA Title II and Section 504 regulations require that the Metropolitan Government operate each of its programs so that, when viewed in its entirety, the program is readily accessible to and usable by individuals with disabilities.

Each department is responsible for notifying the ADA Compliance Division if they have reason to believe a program, service, or activity they are responsible for providing is not in compliance with the American's

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with Disabilities Act. The Compliance Division will review the program as well as the physical location of the program to determine if any changes are necessary.

### Accessible Transportation

The Metropolitan Transit Authority provides both fixed route and Access ride transportation. All fixed route buses are accessible.

The Nashville Metropolitan Transit Authority's (MTA) AccessRide program is a publicly funded paratransit service, which operates specialized van services for persons with disabilities who are unable to use regular fixed-route buses. AccessRide provides door-to-door paratransit service within Davidson County, excluding commuter or express service. AccessRide personnel are directly responsible for:

Certifying eligible paratransit passengers

Managing ridership accounts

Scheduling rides

Managing AccessRide customer care

Reporting service and financial information to the MTA

Providing travel training for people who would like to learn how to use fixed-route bus services

Ensuring all operators and staff are trained extensively for sensitivity awareness, vehicle operation and passenger assistance

Providing reliable van service through preventive maintenance

### Eligibility for ADA Paratransit

#### Categories for ADA Eligibility

AccessRide provides service to persons whose temporary or permanent disabilities prevent their independent use of public transportation. To determine eligibility for paratransit service, individuals must complete an application for ADA paratransit service and demonstrate, that because of their disability, they are unable to use MTA's fixed-route bus service for one (or more) of the following three reasons:

Unable to independently ride a bus. This applies to an individual who cannot independently negotiate the fixed-route system (board, ride or disembark from a bus.)[Code (Section 37.123(e)(1))]

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**Unable to get on or off a bus. This applies to an individual who would have been able to use the fixed-route system if it were accessible (i.e., if a low-floor or lift-equipped bus is not available). [Code (Section 37.123(e)(2))]**

**Unable to get to or from a bus stop. This applies to an individual who, because of his/her disability, cannot access a bus stop to board the fixed-route system and cannot access his/her final destination after disembarking from a fixed-route bus. Eligibility is determined each time the eligible customer calls. Two important qualifiers to this category are included in the regulations. First, environmental conditions and architectural barriers not under the control of the public entity do not, when considered alone, confer eligibility. Inconvenience in using the fixed-route system is not a basis for eligibility. [Code (Section 37.123 (e)(3))]**

#### **Accessible Taxi's**

**The majority of taxi vehicles are now mini vans. While there are no specific ADA requirements for mini vans The ADA Compliance Division has established criteria that, when adhered to, will make the mini van accessible to and usable by people with disabilities. Any taxi service provider who wishes to designate a minivan as accessible must make the necessary modifications to the vehicle and present the vehicle to one of our ADA Compliance Inspector's for inspection. If the vehicle passes the inspection they can then proceed to the Transportation Licensing Commission for certification.**

#### **Public Schools (including Charter Schools)**

##### **Metropolitan Nashville Public Schools (MNPS)**

**All construction activity taking place on any MNPS owned or leased property must be reviewed by the ADA Compliance Division to ensure compliance. This includes all Charter schools. In addition, any request for accommodation made by a student, teacher, school employee, or member of the public must be reviewed by the ADA Compliance Division to ensure any proposed accommodation plan does not conflict with ADA standards. For more information on MNPS ADA compliance efforts please visit their web site which is linked below:**

**<https://www.mnps.org/ada-compliance>**

**Questions, concerns, complaints, requests for accommodations, or requests for additional information please click the appropriate links MNPS ADA Public Notice [ADA, Title I](#), [ADA, Title II](#), or [Section 504](#).**

#### **Public Right-of-Way (ROW)**

**Public ROW activities are managed on a day-by-day basis by the Public Works Department. Other departments and entities such as Metro Water, and Nashville Electric Service often perform work that**

affects the ROW, as do investor-owned utility companies, like Piedmont Gas, and telecommunications companies.

Sidewalks are an important program for people with disabilities. The Public Works Department is committed to ensuring that all new construction is ADA compliant and that all existing sidewalk that is not in compliance is included in the plan for improvements.

The Public Works Department utilizes Nashville's Green and Complete Streets policy as part of their design standards. In addition, Public works is an integral part of the Strategic Plan for Sidewalks and Bikeways.

A transition plan has been developed by Public Works to project the completion of improvements, provide a cost estimate for these improvements, and to report on the completion progress.

Closing a sidewalk, street, or lane in the public right-of-way can cause inaccessibility to travel for people with disabilities. To ensure path-of-travel requirements are met all sidewalk, street, and lane closures taking place on public right-of-way are required to comply with ADA standards and the contractor must complete an application with the Department of Public Works which will include a plan to perform a compliant closure and to provide an alternate path of travel.

(Please see a link to the Public Works Self-Assessment for Sidewalks and Pedestrian Signals.)

#### **Departmental Responsibilities**

Each Metro department will maintain a departmental ADA coordinator. This coordinator will work with the ADA compliance division to ensure their department's programs, services, and activities are in compliance with ADA standards.

Departments are responsible for notifying the ADA compliance division of any changes to programs, services, or activities that may have an impact on ADA accessibility. This includes any planned construction, renovation, or alteration to the facility or grounds that the activity is conducted.

All Metro departments have been canvassed about any ADA compliance issues they may have with their programs, services, and activities they are conducting, as they relate to their facilities, and have not reported any instances of noncompliance at this time.

#### **Community Involvement**

Input from the community is a vital component of an effective ADA program. Early in the ADA Compliance Division's existence we realized how valuable people with disabilities and disability advocates are with their actual experience in dealing with ADA compliance. Through the years we have formed what we consider partnerships with the disability community in order to receive input, advice, and to help report situations that they feel may not be in compliance with ADA.

#### **Mayor's Advisory Committee for People with Disabilities**

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A committee made up of people with disabilities and people who advocate for people with disabilities was formed under former Mayor Richard Fulton. To make the committee an official advisory body an Executive Order was issued by Mayor Bill Purcell to that effect. This committee keeps the mayor abreast of issues that affect members of the community who have disabilities. The committee also studies issues to see how decisions made by Metro Government might impact the disability community. Further information about this committee can be found at the link below:

<https://www.nashville.gov/departments/general-services/ada-compliance/mac-people-disabilities>

### Disability Information

Nashville has many large and small organizations that provide various types and levels of information and service to people with disabilities. The ADA Compliance staff serve as source for information about disabilities and related resources and resource for fostering public awareness and understanding of disabilities and people with disabilities.

The ADA Compliance staff provide information to guide callers to those local resources that may be able to assist them with issues related to their disabilities. Staff are typically available Monday through Friday, from 7:00 AM to 3:30 PM. If no one is available to answer, callers may leave voice mail.

Disability Information: 615-862-6492

### Internet Content

The Metro Information Technology Services (ITS) department works to ensure Metro Government internet content is accessible for people with disabilities. Section 508 of the Rehabilitation Act outlines the requirements for accessibility. Content Nashville.gov must be reviewed by a member of the ITS Webteam. One of the areas checked is for accessibility. Metro does its best to make sure that web content on Nashville.gov meets Web Content Accessibility Guidelines v2.0 Levels A and AA. Occasionally Metro may perform an accessibility check of a department's overall content presentation such as during a content reorganization. If an area of non-compliance is detected Metro encourages individuals to contact the ADA Compliance Division and/or the ITS Webteam to discuss the issue.

### Non-traditional Means of Transportation and Non- Traditional Personal Mobility Devices

With advancements in technology and new and innovative designs, what has always been thought of as traditional personal mobility devices must be considered. We typically think of wheelchairs, walkers, canes, etc., as the only mobility devices. Segways and motorized scooters are recent devices that have gained in popularity. Regardless of the type of future mobility devices care must be taken so the use of the devices do not hinder travel for people with disabilities.

For non-traditional devices known as Shared Urban Mobility Devices (SUMD) permitted by the city, the Metropolitan Council and the Transportation Licensing Committee (TLC) will set rules, regulations, and

fees. When SUMDs first began operating within the Metropolitan area, complaints and other anecdotal evidence established, for purposes of Metro's self-evaluation, that SUMDs were interfering with accessibility of Metro Sidewalks. In response to this, the Metropolitan Government took action, cutting issued permits for SUMDs in half (by enactment of Substitute Ordinance BL2019-1658) and establishing corrals within which SUMDs were required to be parked within the downtown Nashville area, which have greatly improved the situation. Going forward, an RFP is being developed to govern future permits for SUMDs in Metro. This RFP's requirements will include stringent compliance with the ADA by any SUMD operator wishing to win the award of permits under this RFP. TLC will continue to consult with the ADA Compliance Division and the Mayor's Advisory Committee for People with Disabilities to help determine if any possible ADA violations continue to arise as a result of the introduction of the device. Upon the issuance of permits the TLC will monitor the usage of the devices and will have in place a system of penalties that will be imposed when violations occur. These penalties can include probation, suspension, fines, or contract termination.

For personal non-traditional mobility devices used by people with disabilities, these devices will be treated the same as traditional mobility devices such as wheelchairs. Anywhere pedestrian travel is permitted all personal mobility devices are allowed.

#### Prioritization Criteria for Transition Plan (Right-of-Way)

All locations which have been identified as being non-compliant will be addressed based on a two level prioritization criteria.

The first level, as directed by 28 C.F.R. § 35.150 prioritization will be given in the following order:

- Walkways serving state and local government offices and facilities
- Walkways serving transportation facilities
- Walkways serving places of public accommodation
- Walkways serving places of employment

The second level will follow the order of prioritization above, but will also break the criteria down further as follows:

1. No curb ramp
2. Non-compliant curb ramp
3. Improper width for path of travel (Including poles, street furniture, newsstands, etc.)
4. Broken surface material
5. Buckling surface material

6. **Non-compliant curb ramp landing**
7. **Pedestrian crossing signal access (Access to the push button)**
8. **Excessive cross slope**
9. **Changes in level**
10. **Protruding objects (Trees, bushes, etc.)**

**Examples-**

1. **One walkway serving state and local government offices and facilities has a non-compliant curb ramp. The second walkway serving state and local government offices and facilities does not have a curb ramp. The first scenario will take precedence.  
The basis is that even though the second scenario has a non-compliant issue that is ranked higher than the first scenario, the first scenario will take precedence in lieu of it being located higher in the criteria spelled out in 28 C.F.R. § 35.150.**
2. **A walkway serving places of employment has a non-compliant curb ramp. The second walkway serving state and local government offices and facilities does not have proper width. The second scenario will take precedence. The basis is that even though the first scenario has a non-compliant issue ranked higher than the issue in the second scenario, the second scenario will take precedence in lieu of it being located higher in the criteria spelled out in 28 C.F.R. § 35.150.**
3. **A walkway serving a place of public accommodation does not have a curb ramp. A walkway serving transportation facilities also does not have a curb ramp. The second scenario will take precedence. The basis is that even though both scenarios have the same non-compliant issue the second scenario will take precedence in lieu of it being located higher in the criteria spelled out in 28 C.F.R. § 35.150.**

**Citizen Requests/Complaints**

**Citizen requests and complaints will be reviewed by Public Works and the ADA Compliance division. If a complaint is deemed legitimate the area will be moved ahead of other projects in the transition plan. For requests (changes, additions, etc.) Public Works and the ADA Compliance division will review the request and determine if the request is reasonable, practical, necessary,**

**Sidewalks and Pedestrian Signals**

**Below are links to the Department of Public Works sidewalk self-assessment and the pedestrian signal self-assessment.**

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<https://data.nashville.gov/Transportation/Sidewalk-Inventory-for-ADA-Self-Assessment/vpxc-b5te>

<https://data.nashville.gov/Transportation/Pedestrian-Signal-Inventory-and-ADA-Self-Assesmen/6xet-f7u7>

### Tracking Progress of the Transition Plan

The transition plan for Metro Government will be officially updated every two years. Continuous monitoring of progress will be conducted by the Metro ADA Title II Coordinator.

A system will be developed to post progress on Metro's web site that will be available to the public.

Any new ADA issues that arise will be added to the transition plan and be prioritized according to Department of Justice, Federal Highway Administration, and other regulatory agency guidelines.

Below is a link to the web page for the ADA Compliance Division, which is part of the Department of General Services. This web page provides useful information for Metro's ADA program:

<https://www.nashville.gov/General-Services/ADA-Compliance.aspx>

### Explanation of Findings and Prioritization For Right-of-Way

## Sidewalk and Curb Ramp Inventory of Physical Barriers

### Methodology

The City of Nashville and Davidson County (Nashville) performed an inventory of and ADA assessment of over 1,150 miles of existing sidewalks to identify ADA issues and barriers within the Right-of-Way. The inventory was collected utilizing real-time GPS and GIS technologies to collect over 147,000 sub-meter GPS points with attached defect information and related photolog. The sidewalk data collection was specifically utilized to evaluate path of travel, evaluate surface conditions (cracks, faults, cross-slope) and evaluate curb ramps.

### Path of Travel

The sidewalk collection was limited to items that impede on pedestrian right of way within their 36" horizontal path of travel and signage that has an overhang below 70" on the vertical.



Sign is too low



This sign barely qualifies, but it needs inventoried



This pole is in the way of path of travel. You measure from the edge of the pole to the edge of the concrete.

## Sidewalk Surface Conditions

All sidewalk defects and obstructions were evaluated and inventoried as follows.

### Joint Faults

Joint Faults are vertical displacements of sidewalk at slab/panel points. Severity was measured in inches of vertical displacement as follows: **Low:**  $\frac{1}{4}$ " to  $\frac{1}{2}$ " (vertically)

**Medium:**  $\frac{1}{2}$ " to 1"

**High:** > 1"



Low



Medium



High

### Joint Separation

Joint Separations are horizontal displacement of concrete at a slab or panel intersection. Severity is measured in inches of horizontal displacement: **Low:**  $\frac{1}{2}$ " to 1" (horizontally)

**Medium:** 1" to 2"

**High:** > 2"



Low



Medium



High

### Horizontal Cracks

Horizontal cracks are cracks either perpendicular or longitudinal with the path of travel that have horizontal displacement ONLY. Severity is measured in inches of horizontal displacement:

**Low:**  $\frac{1}{2}$ " to 1" (horizontally)

**Medium:** 1" to 2"

**High:** > 2"



Low



Medium



High

### Vertical Fault Cracks

Vertical Fault Cracks are cracks within a panel or slab that have vertical displacement. If a crack has vertical and horizontal displacement, it was considered a Vertical Fault Crack. Severity was measured in inches of vertical displacement:

**Low:**  $\frac{1}{4}$ " to  $\frac{1}{2}$ " (vertically)

**Medium:**  $\frac{1}{2}$ " to 1"

**High:** > 1"



Low



Medium



High

### Structural Damage

Structural Damage consists of various damage including cracking, spalling, pop outs, etc. indicating overall structural damage to the sidewalk. Severity is categorized based on the following:

**Low:** Very minor spider cracking, spalling or pop outs at least  $\frac{1}{4}$ " deep, but less than  $\frac{1}{2}$ " deep

**Moderate:** Moderate minor spider cracking, spalling or pop outs  $> \frac{1}{2}$ " to  $\frac{3}{4}$ "

**High:** Major minor spider cracking, spalling or pop outs  $> \frac{3}{4}$ "



Low



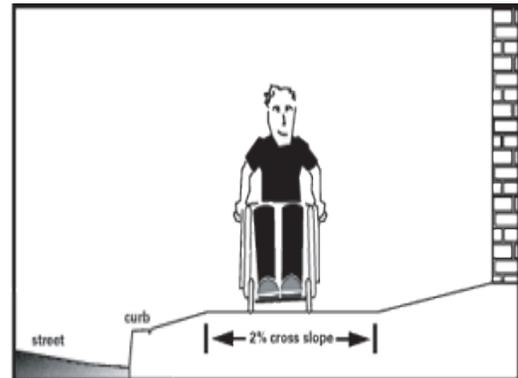
Medium



High

## Sidewalk Cross-Slope

ADA requires a 36" width sidewalk to be no more than a 2% cross-slope in order to be compliant with the pedestrian circulation network for people with disabilities. This includes sidewalks, curb ramps, driveway crossings, street crossings and locations where two sidewalks converge.



Cross-slope less than 2%



Smart Tool used to measure Cross-Slope



Smart Tool Screen

All cross-slope readings were measured in % slope and collected as a point with the GPS for the following locations along each sidewalk block:

**Sidewalk Start**

**Sidewalk End**

**Change of Sidewalk**

**Every 200 feet**

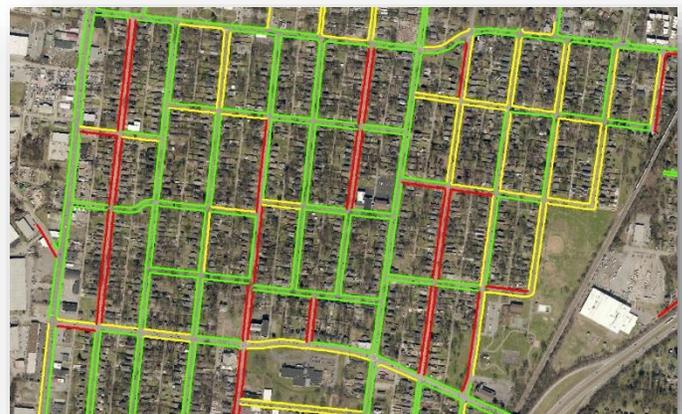
**Table 1 – Barriers and ADA Issues Inventoried**

Types of ADA Sidewalk Issues	
Exact location of sidewalk	Electric box obstructions
Type of material of sidewalk	Other electric obstructions
Width of sidewalk	Gas valve or meter obstructions
Total length of sidewalk	U. S. Post Office mailbox obstructions
Electric manhole obstructions	Private mailbox obstructions
Length of sidewalk under construction	Other path of travel obstructions
Length of damaged sidewalk	Telephone obstructions
Horizontal cracks greater than 1/2 inch	Telephone manhole obstructions
Vertical cracks greater than 1/4 inch	Telephone box obstructions
Cross slopes less than 2%	Other telephone obstructions
Cross slopes from 2% to 3%	Sign obstructions
Cross slopes greater than 3%	Traffic signal pole obstructions
Water meter obstructions	Traffic signal cabinet obstructions
Water hydrant obstructions	Tree obstructions
Water manhole obstructions	Commercial driveway obstructions
Other water obstructions	Residential driveway obstructions
Electric pole obstructions	New sidewalk ramps (ADA compliant)
Length of missing sidewalk (Missing sidewalk is defined as a gap between two existing sidewalks that is less than 1/4 mile in length. )	Old sidewalk ramps (ADA non-compliant)
	Missing sidewalk ramps (locations where ramps are required per Metro's standards or per ADA guidelines, but have not yet been installed)

Table 1 below describes types of barriers and ADA issues evaluated and inventoried.

### Sidewalk Condition Assessment

Metro Nashville utilized the barrier and ADA issue inventory to develop a condition rating for each block (intersection to intersection) of existing sidewalk throughout the County. The existing sidewalk data collected was utilized to calculate a percent damaged by determining the approximate length of sidewalk that would need to be replaced to



Example Map of Good, Fair and Poor Sidewalks

address each deficiency collected and dividing by the overall length of the sidewalk segment. Based on these calculations, the sidewalks were categorized as Good, Fair or Poor condition based on the following percent damaged numbers.

**Good** – 0% to 20% damaged

**Fair** – 21% to 50% damaged

**Poor** – 51% to 100% damaged

**Table 2 – Sidewalk Inventory Condition Assessment Summary and Cost**

Category	Total Network for Sidewalk Repair (along one side of road)		Approximate Cost per Foot	Total Cost per Category
	Feet	Miles		
Sidewalk in 'Fair' Condition	1,380,000	261	85	\$117,000,000
Sidewalk in 'Poor' Condition	830,000	157	140	\$116,000,000
<b>TOTAL</b>	<b>2,200,000</b>	<b>418</b>		<b>\$233,000,000</b>

## Sidewalk and Curb Ramp Repair Prioritization Method

Metro Nashville is responsible for the maintenance and repairs for over 1,150 miles of existing sidewalks, which is increasing daily with the installation of new sidewalks through capital projects and new developments. Because of the large overall need, Metro Nashville developed a prioritization scheme to support targeted public investments in sidewalk repair. The following describes the methods used to prioritize sidewalk repairs.

- 1. Sidewalk Service Requests and Requests for ADA Accommodations** – Accessible sidewalks enable people with disabilities to reach their destinations in the community and to enjoy the benefits of services, programs and activities. Requests for sidewalk repairs and ADA requests for accommodations are collected through the Metro Public Works customer service center and the HubNashville website. Projects identified through these avenues that are deemed to be an ADA request, safety hazard or compliance complaint are prioritized first at the discretion of the Public Works ADA coordinator.
- 2. Missing Curb Ramps** – Areas with missing curb ramps do not allow for access to the existing sidewalk network. The sidewalk inventory has identified areas with missing curb ramps and will be utilized to prioritize access to the sidewalk network through individual projects, coordination with other sidewalk repair projects or in conjunction with 20% paving sidewalk repairs (described in the next section).

3. **20% Paving Policy** – Nashville has a policy to require all capital and/or infrastructure projects to provide sidewalk repairs along the project corridor utilizing a set aside budget of 20% of all paving costs associated with the project. This policy will continue to be enforced to address sidewalk repairs outside of the sidewalk capital budget.
4. **Sidewalks in Poor Condition** – Sidewalks in poor condition will be prioritized for sidewalk maintenance and repair projects. The prioritization process outlined in Metro Nashville’s WalknBike Strategic Plan will be utilized along with damage assessment field checks, coordination with other projects and project limit evaluations to prioritize sidewalk repair projects. The following prioritization process will be applied to all sidewalks categorized in “poor” condition as shown below.

#### Sidewalk Repair Prioritization Inputs



The sidewalk repair prioritization inputs shown above are scored to give priority to walkways serving the following in accordance with 28 C.F.R. 35.150 – Existing Facilities as shown in the Sidewalk Repair Prioritization Scoring table below:

✓ Walkways serving state and local government offices and facilities

✓ Walkways serving transportation facilities



Walkways serving places of public accommodations

✓ Walkways serving places of employment

**SIDEWALK REPAIR PRIORITIZATION SCORING**

CRITERIA	DEFINITION	RANK	MEASUREMENT	POINTS
Level of Service	Does the project improve conditions on a corridor with poor infrastructure?	N/A	Assessed sidewalk condition	30
✓ Health + Equity	To what extent does the project benefit the underserved	High Medium	Census Tract is in 3 or 4 health priority areas Census Tract is in 1 or 2 health priority areas	30 15
✓ Transit Access	To what extent does this improve pedestrian access to transit?	High Medium	Project is within 1/4 mile of transit center or transit stop with > 100 boardings/day Project is within 1/4 mile of transit center or transit stop with 20 to 100 boardings/day	30 15
✓ Serves Activity Centers	Is the project in an area with high demand for walking?	High Medium	Estimated walking trips > 150 Estimated walking trips between 50 and 150	20 10
✓ Supports Aging Population	Does the project serve aging residents?	High Medium	More than 25 residents per thousand acres over 65 15-25 residents per thousand acres over 65	20 10
✓ School Access	Does the project serve a school?	High Medium	Project is within 1/4 mile of a school Project is within 1/2 mile of a school	20 10
✓ Recreational Access	Does the project serve a park or trail?	High Medium	Project is within 1/4 mile of a park or trail Project is within 1/2 mile of a park or trail	10 5
✓ Civic Amenity Access	Does the project serve a library or community center?	High Medium	Project is within 1/4 mile of a library or community center Project is within 1/2 mile of a library or community center	10 5
✓ Private Activity Center Access	Does the project serve a boys and girls club, YMCA or senior center?	High Medium	Project is within 1/4 mile of a private activity center Project is within 1/2 mile of a private activity center	10 5
✓ Shopping Access	Does the project serve a retail or commercial destination?	High Medium	Project is within 500' of a retail or commercial destination Project is within 1000' of a retail or commercial destination	10 5
<b>Maximum Points</b>				<b>190</b>

**RECOMMENDATIONS**

Below are Transition Plan and funding targets and recommendations for Nashville’s existing sidewalk network.

Existing Sidewalk ADA Transition Plan		
Target	Schedule	Estimated Annual Budget
Install Missing Curb Ramps and Repair all Sidewalks in “Poor” Condition	15 Years	\$10 million*
Repair all Sidewalks in “Good” and “Fair” Condition	35 Years	
Repair/Rehabilitate a Minimum of 15 Miles/Year	Annually	Included in the \$10 million* annual budget

\*Assumes utilizing 1/3 of the Sidewalk Capital Budget at an estimated \$30 million per year. If capital funding is less or more, 1/3 of the budget will be committed to the Transition Plan Target.

To maintain progress in this Transition Plan, Metro Nashville recommends that the following standards are upheld:

- ✓ **Provide consistent funding** to maintain momentum of sidewalk repairs and maintenance.
- ✓ **Identify vertical obstructions** affecting path of travel and notify the responsible parties to relocate.

- ✓ **Implement an on-going sidewalk self-assessment program** to assure that the most consistent data is being evaluated when implementing sidewalk repairs and maintenance. It is recommended to assess 10% of the sidewalk network annually on a rotating basis.
- ✓ **Prepare Transition Plan updates at least every 2 years** to provide a clear plan for addressing Nashville's known ADA issues.
- ✓ **Continue the 20% paving requirement** for all paving maintenance/capital projects and require and track ADA sidewalk and curb ramp audits to assure ADA compliance and track progress. Require that all sidewalk repairs triggered by the 20% paving requirement be funded by the triggered maintenance/project.
- ✓ **Continually monitor** all ADA sidewalk and curb ramp repairs, replacements and rehabilitations accomplished throughout Metro Government to track progress of the Transition Plan target goals.

## Signalized Pedestrian Crossing Inventory and Compliancy Assessment

### Methodology

The City of Nashville and Davidson County (Nashville) performed an inventory and compliance review of 1,614 street corners to identify ADA deficiencies in Nashville's signalized pedestrian infrastructure. The inventory was collected utilizing real-time GPS and GIS technologies to collect over 1,400 pedestrian signals, detailing areas of noncompliance with related photolog. The data collection was specifically utilized to evaluate proximity, orientation and dimensions, as well as signal initiation and indicator requirements.

### Proximity

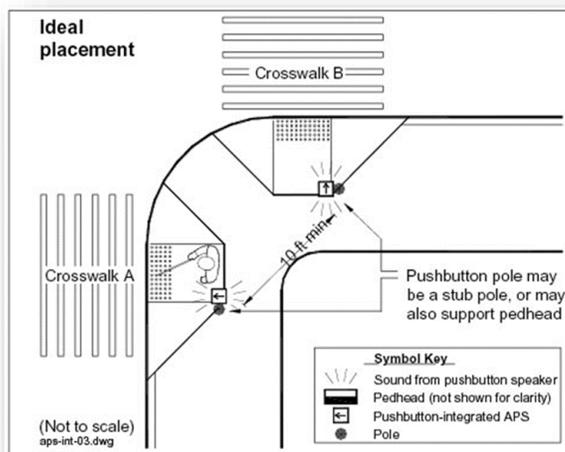
The inventory collected information related to the signal's location within the path of travel. This included specific measurements from the push button to adjacent pedestrian elements to maximize accessibility. Accordingly, the subject push button should be located within 5' of the crosswalk and no more than 10', 10" and 10' from the curb, landing and adjacent button, respectively.



Example of compliant push button with crosswalk



Example of compliant push button with curb



Required 10' separation between adjacent push buttons

### Orientation & Dimensions

Dimension and orientation requirements of both the landings and push buttons were also tested. The push button, at least 2" in diameter, should be located between 40" and 44" above the sidewalk and pointed in the direction of service. The landing was also measured for its dimensions, a 34" x 54" minimum for compliance, and its cross slope, a 2% minimum for compliance.



Push button that exceeds the height requirements, Harding Pike and White Bridge Pike



Pedestrian signal with failed landing requirements, Old Hickory Boulevard and Park Circle

### Signal Initiation and Indicators

The pedestrian signal must be obvious and operational for all people, regardless of their disability. As such, the push button should have a visual contrast with its surroundings and allow for initiation by fist with no more than 3.5 pounds of force. It should also have visual and audible indicators to accommodate the visually and audibly impaired.



Push button with poor visual contrast, Charlotte Pike and George L Davis Boulevard



Push button cannot be initiated with fist, South 2<sup>nd</sup> Street and Shelby Avenue

### Pedestrian Signal Compliancy Assessment

Metro Nashville utilized the collected data to identify areas of noncompliance within each pedestrian signal. The results are as follows:

Table 2 – Pedestrian Signal Compliance

		Number Evaluated	Number Compliant	Percent Compliant
	<b>Number of inspections</b>	2,700		
	<b>Total intersections evaluated</b>	467		
	<b>Signalized intersections</b>	381		
	<b>Total pedestrian signals</b>	1,464	151	10%
<b>Proximity</b>	Push button offset from crosswalk $\leq$ 5'		823	56%
	Push button offset from curb, 2.5'-10'		969	66%
	Push button offset from landing $\leq$ 10"		1,077	74%
	Push button separation from another $\leq$ 10'		807	55%
<b>Orientation &amp; Dimensions</b>	Push button height, 40"-44"		1,044	71%
	Push button orientation is parallel to crossing direction		1,356	93%
	Push button is 2"		1,298	89%
	Clear space cross slope $\leq$ 2%		1,304	89%
<b>Initiation &amp; Indicators</b>	Push button force to initiate $\leq$ 3.5lbf		1,340	92%
	Push button able to be initiated with fist		1,253	86%
	Push button visual contrast between itself and housing		1,133	77%
	Push button has visual indicator of initiation		1,118	76%
	Push button has audible indicator of initiation		1,122	77%

To bring pedestrian signals to ADA standards would require one or more of the following: replacing pushbuttons, modifying landings, installing pushbutton pedestals or a complete signal replacement altogether. Fortunately, addressing one noncompliance often solves another and to that extent, the barrier to standardizing the existing pedestrian signals is diminished.

## Pedestrian Signal Prioritization Method

Metro Nashville is responsible for over 1,450 pedestrian signals throughout Davidson County, many of which are in need of maintenance or repair to address ADA compliance standards. As such, the City has developed a plan for addressing the pedestrian infrastructure to support targeted public investments in safe streets. The section that follows describes these prioritization methods with the first step being to identify the targets for standardizing pedestrian infrastructure:

- 1. Replace pushbuttons** – Effective pushbuttons allows the pedestrian, both disabled and abled bodied, to identify and initiate the signal in their direction of travel. It requires the appropriate placement and orientation as well as the accessibility to easily identify and initiate. Approximately one-fifth of the pushbuttons could be brought to ADA standards through the replacement of pushbuttons.
- 2. Modify Landings** – Equally as important as the erected infrastructure, such as buttons, ped heads and pedestals, are the landings to which they're secured. Properly constructed landings allow for a smooth transition from pavement to concrete. They also play a role in the pushbutton's accessibility, allowing the user to reliably locate and remain within the sidewalk area while initiating the signal. There are 114 landings, or approximately 9% of the noncompliant signals, that could be resolved with reconstruction.
- 3. Install pushbutton pedestals** – The pushbutton's location at a street corner is paramount to not only its compliance to ADA standards but also to its ease of use. Buttons secured to the same pole, in addition to being noncompliant, are often confusing in their direction of service and/or unpredictable in their placement. Of the 1,313 noncompliant pedestrian signals, approximately 15% have buttons that violate this standard and should be relocated and replaced with their own pedestal.
- 4. Completely replace signal** – A complete signal includes a pushbutton and ped head as well as the appropriate vertical structure to support them. The accessibility of the entire signaling unit is practically neutralized if it is not readily available as one exists the crosswalk pavement. The remaining 935 noncompliant pedestrian signals, or 71%, would be standardized by the replacement of these units.

With well over a thousand inventoried pedestrian signals, each with their own unique combination of standardization, the targets by which the existing pedestrian infrastructure will be handled is laid out above. In the interest of comprehensive and practical solutions, Metro Nashville will address signals on an intersection basis. By addressing pedestrian signals on an intersection basis, Metro Nashville can accomplish the following:

- ✓ Methodically eliminate areas of noncompliance
- ✓ Enable full-service intersections for pedestrian traffic
- ✓ Condense multiple non-compliance elements into a single intersection's targets

- ✓ Utilize Nashville’s WalknBike plan to prioritize intersections

The WalknBike prioritization inputs were discussed previously on page 7 of this transition plan in regards to the sidewalk and curb ramps. The inputs and prioritization scoring are similarly utilized to give priority to intersections serving the standards presented in 28 C.F.R 35.150 – Existing Facilities; that scoring table is reproduced below:

**NONCOMPLIANT SIGNALIZED INTERSECTIONS - PRIORITIZATION SCORING**

CRITERIA	DEFINITION	RANK	MEASUREMENT	POINTS
<b>Health + Equity</b>	To what extent does the project benefit the underserved	High	Census Tract is in 3 or 4 health priority areas	30
		Medium	Census Tract is in 1 or 2 health priority areas	15
<b>Transit Access</b>	To what extent does this improve pedestrian access to transit?	High	Project is within 1/4 mile of transit center or transit stop with > 100 boardings/day	30
		Medium	Project is within 1/4 mile of transit center or transit stop with 20 to 100 boardings/day	15
<b>Serves Activity Centers</b>	Is the project in an area with high demand for walking?	High	Estimated walking trips > 150	20
		Medium	Estimated walking trips between 50 and 150	10
<b>Supports Aging Population</b>	Does the project serve aging residents?	High	More than 25 residents per thousand acres over 65	20
		Medium	15-25 residents per thousand acres over 65	10
<b>School Access</b>	Does the project serve a school?	High	Project is within 1/4 mile of a school	20
		Medium	Project is within 1/2 mile of a school	10
<b>Recreational Access</b>	Does the project serve a park or trail?	High	Project is within 1/4 mile of a park or trail	10
		Medium	Project is within 1/2 mile of a park or trail	5
<b>Civic Amenity Access</b>	Does the project serve a library or community center?	High	Project is within 1/4 mile of a library or community center	10
		Medium	Project is within 1/2 mile of a library or community center	5
<b>Private Activity Center Access</b>	Does the project serve a boys and girls club, YMCA or senior center?	High	Project is within 1/4 mile of a private activity center	10
		Medium	Project is within 1/2 mile of a private activity center	5
<b>Shopping Access</b>	Does the project serve a retail or commercial destination?	High	Project is within 500' of a retail or commercial destination	10
		Medium	Project is within 1000' of a retail or commercial destination	5
<b>Maximum Points</b>				<b>160</b>

**Recommendations**

Below are Transition Plan and funding targets as well as recommendations for Nashville’s existing pedestrian signal infrastructure.

Existing Pedestrian Signal ADA Transition Plan		
Target	Schedule	Estimated Annual Budget
Replace or rehabilitate all existing pedestrian signals	15 Years	\$1 million*
Address 90 pedestrian signals	Annually	Included in the \$1 million* annual budget

\*This is not currently a funded program and assumes a new funding allocation of \$1M/YR or funding allocations from other related programs.

Metro Nashville proposes to address approximately 90 pedestrian signals annually to accomplish the 15-Year target with the estimated funding above. This includes the replacement of pushbuttons, modifying landings, installing pushbutton pedestals or completely replacing signals altogether. To maintain progress in this Transition Plan, Metro Nashville recommends that the following standards are upheld:

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- ✓ **Provide consistent funding** to maintain momentum of pedestrian signal replacements or rehabilitations.
- ✓ **Prepare Transition Plan updates at least every 2 years** to provide a clear plan for addressing Nashville's known ADA issues.
- ✓ **Continually monitor** all ADA signal replacements and rehabilitations accomplished throughout Metro Government to track progress of the Transition Plan target goals.

Below is a link to the Department of Public Works Sidewalk Inventory and Self-Evaluation

<https://data.nashville.gov/Transportation/Sidewalk-Inventory-for-ADA-Self-Assessment/vpxc-b5te>

Below is a link to the Department of Public Works Pedestrian Signal Inventory and Self-Assessment

<https://data.nashville.gov/Transportation/Pedestrian-Signal-Inventory-and-ADA-Self-Assesmen/6xet-f7u7>

### **Nashville MTA/ WeGo Public Transit ADA Transitional Plan**

WeGo Public Transit provides public transportation throughout the Nashville metropolitan area. WeGo operates with the support of personnel employed by the Davidson Transit Organization. WeGo is governed by a five-member Board of Directors. WeGo's budget is funded by fare and advertising revenue along with money from the state and local governments. WeGo Public Transit began providing service in 1973 as the Metropolitan Transit Authority after the purchase of the Nashville Transit Company by the Metropolitan Government of Nashville and Davidson County.

#### **WeGo Mission Statement**

Our mission is to provide public transportation services to our community and its' visitors so they can achieve greater mobility and experience a cleaner, healthier environment with less traffic congestion

#### **INTRODUCTION**

##### **Transitional Plan Purpose**

WeGo Public transit is committed to providing programs services and facilities that are accessible to all riders. This transitional plan is intended to guide WeGo Public transit in providing accessible services.

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**The Americans with Disabilities Act (ADA), enacted on July 26, 1990, is a civil rights law prohibiting discrimination against individuals on the basis of disability. ADA consists of five titles outlining protections in the following areas:**

- 1. Employment**
- 2. State and local government services**
- 3. Public accommodations**
- 4. Communications**
- 5. Miscellaneous Provisions.**

#### **7 Steps to ADA Compliance**

**Step 1- Designate an ADA Coordinator**

**Step 2- Provide notice to the public about ADA requirements**

**Step 3- Establish a grievance procedure**

**Step 4- Develop internal design Standards, specifications, and details**

**Step 5- The ADA Transition Plan**

**Step 6- Schedule and Budget improvements**

**Step 7- Monitor the progress on the implantation of the Transition Plan**

#### **Agency Requirements**

**Under Title II, the WeGo Transit must meet these general requirements:**

**Must operate our programs so that, when viewed in our entirety, the programs are accessible to and useable by individuals with disabilities (28 C.F.R. Sec. 35.150).**

**May not refuse to allow a person with a disability to participate in a service, program or activity simply because the person has a disability (28 C.F.R. Sec. 35.130 (a)).**

**Must make reasonable modifications in policies, practices and procedures that deny equal access to individuals with disabilities unless a fundamental alteration in the program would result (28 C.F.R. Sec. 35.130(b) (7)).**

**May not provide services or benefits to individuals with disabilities through programs that are separate or different unless the separate or different measures are necessary to ensure that benefits and services are equally effective (28 C.F.R. Sec. 35.130(b)(iv) & (d)).**

**Must take appropriate steps to ensure that communications with applicants, participants and members of the public with disabilities are as effective as communications with others (29 C.F.R. Sec. 35.160(a)).**

**Must designate at least one responsible employee to coordinate ADA compliance [28 CFR Sec. 35.107(a)]. This person is often referred to as the "ADA Coordinator." The public entity must provide the ADA coordinator's name, office address, and telephone number to all interested individuals [28 CFR Sec. 35.107(a)].**

**Must provide notice of ADA requirements. All public entities, regardless of size, must provide information about the rights and protections of Title II to applicants, participants, beneficiaries, employees, and other interested persons [28 CFR Sec. 35,106]. The notice must include the identification of the employee serving as the ADA coordinator and must provide this information on an ongoing basis [28 CFR Sec. 104.8(a)].**

**Must establish a grievance procedure. Public entities must adopt and publish grievance procedures providing for prompt and equitable resolution of complaints [28 CFR Sec. 35.107(b)]. This requirement provides for a timely resolution of all problems or conflicts related to ADA compliance before they escalate to litigation and/or the federal complaint process.**

#### **Non-discrimination Requirements**

- **We cannot discriminate against a person with a disability in the provision of transportation service. (Section 37.5(a))**
- **We cannot, on the basis of disability, deny an individual with a disability the opportunity to use the general transportation system if that person is capable of using that service. (Section 37.5 (b))**
- **We cannot require that an ambulatory person with a disability use priority seating. (Section 37.5 (c))**
- **We cannot impose special charges on individuals with disabilities, including those who use a wheelchair. (Section 37.5(d)) \*\*Note that this is not the same as charging an ADA-eligible paratransit fare that is equal to the base fixed route fare times two (see section on ADA Paratransit Service Criteria).**
- **We cannot require that an individual with a disability be accompanied by an attendant. (Section 37.5(e))**
- **We cannot refuse service to an individual with disabilities because your insurance coverage or rates are based on the absence of individuals with disabilities. (Section 37.5(g))**

■ We cannot deny service to an individual with disabilities because his/her disability results in appearance or involuntary behavior that may offend, annoy, or inconvenience employees or other persons. (Section 37.5 (h))

benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such entity.” (42 USC. Sec. 12132; 28 CFR. Sec. 35.130)

## SELF-EVALUATION

ADA regulation, 28 CFR § 35.105(a), requires that “a public entity shall, within one year of the effective date of this part, evaluate its current services, policies, and practices, and the effects thereof, that do not or may not meet the requirements of this part and, to the extent modification of any such services, policies, and practices is required, the public entity shall proceed to make the necessary modifications.”

The first step to developing an ADA Transition Plan is to obtain an inventory of barriers and identify the existing condition of accessibility of public information and features on WeGo Transit facilities and public rights-of-way.

### Building Facilities Summary

Self-evaluation is an assessment of building facilities which included an accessibility evaluation of the following categories:

- Site: parking spaces, drop-off zones, walkways, ramps, handrails, curb ramps.
- Building: stairs, lifts, elevators, ramps, handrails, doorways, door approaches, corridors.
- Spaces: restrooms, breakrooms, conference rooms, meeting areas.
- Other Elements: Telephones, Drinking Fountains, Counters/Desks

Nashville MTA will continue to ensure that facilities maintain this status. New construction or significant facility improvements – will meet the ADA requirements as outlined by Federal regulations.

### Vehicles Summary

In order to be ADA compliant, Nashville MTA ensures its fleet of vehicles meets the guidelines for compliance as stated in Federal regulations.

As of Nov. 1, 2019, Nashville MTA has a fleet of 196 buses.

### **Mobility Aid Accessibility**

Per Federal requirements, all new, used, or remanufactured buses and vans must “provide a level-change mechanism or boarding device (e.g., lift or ramp) and sufficient clearances to permit a mobility aid user to reach a securement location.” All of Nashville MTA buses have a lift or ramp that can support a load of up to 800 pounds and is equipped with a slip resistant surface. In addition, each ramp’s slope falls within the Federal regulation guidelines outlined in Accessibility Specifications for Transportation Vehicles

All vehicles within the Metro Bus fleet are designed to secure a minimum of two wheelchairs or mobility aid devices.

### **Priority Seating**

Every Nashville MTA vehicle contains a minimum of one sign indicating priority seating for persons with disabilities. These signs are located at the front of the vehicle and are designed to inform other passengers that such seats will be made available for people who may need them.

### **Stop Requests**

Nashville MTA vehicles provide accessible stop request controls adjacent to the securement locations of mobility aids for passengers to request the vehicle to stop. These controls alert the driver that a request has been made.

Nashville MTA buses are equipped with a public address system that will allow the driver or a digitized voice to announce bus stops. Nashville MTA buses are also equipped with a digital signage of upcoming bus stop.

### **Bus Stop Summary**

Nashville MTA and the Davidson County is constantly looking for opportunity to improve infrastructure to bus stops but also to improve access from bus stops onto the bus. Due to the diversity of development patterns and road types served by Metro Bus, different types of stop configurations have been created to serve a variety areas and conditions.

### **Benches**

Bus benches are often viewed as an important amenity for passengers who may have difficulty walking and standing, and generally provide comfort and convenience at the stop.

### **Universal Design and ADA Accessibility**

When designing stops Nashville MTA considered usability and equity. These two core components are incorporated through universal design elements and accessibility standards, which ensure that the system is familiar at every point a customer accesses it and that it is accessible to anyone that wishes to use it. Universal design also makes the system easier to use because the design elements are reinforced through

repetition. Before beginning any bus stop design, the responsible party should review the 2010 ADA Standards for Accessible Design or the latest available edition, as well as transit agency, local, state and federal guidelines that may impact accessibility or universal design elements.

#### Accessible Boarding Areas Bus stops

Nashville MTA bus stops are located to allow safe and convenient ingress and egress for passengers at all bus doors. In addition, ADA standards require a 5'x8' accessible landing pad for passengers.

#### Inventory

A complete stop inventory and assessment was conducted to evaluate each stop within our system. A spreadsheet was created for all stops in our routes which can be maintained and updated as improvements are made, stops become active, or are removed. The bus stop spreadsheet is attached.

During the inventory process four classifications of stops were determined.

- Good: 0%-20% Non ADA Compliant
- Fair: 21%- 50% Non ADA Compliant
- Poor: 51%-100% Non ADA Compliant

#### NON-COMPLIANT BUS STOPS AND SHELTERS

##### BUS STOP

##### ROUTE NAME

##### BUS ROUTE

##### RATING ESTMAITED COST TO REPAIR

##### ESTMATED DATE OF COMPLETION

Thompson Station Outbound      Murfreesboro PK

15&55    Poor    \$40,000 2025

Five Points Station Inbound      Gallatin PK

26 & 56    Good    15,000    2025

Woodland St & 5th St Westbound      Shelby

4      Fair    40,000 2025

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**Inglewood Station Outbound      Gallatin PK**

**26 & 56 Fair      40,000    2025**

**Walton Station Outbound      Gallatin Pk 26 & 56      Fair      40,000    2025**

**Edgemeade Station Outbound      Gallatin PK**

**26 & 56 Good      40,000    2025**

**Main St & 5th St Westbound      Gallatin PK & McFerrin 26 & 30      Poor      40,000    2025**

**Meridian St & N 2nd St Westbound      Meridian St**

**28      Poor      40,000    2025**

**Wedgewood & 21st In & Outbound      Hillsboro PK**

**7      Poor      40,000    2025**

**Inglewood Station      Gallatin PK**

**26 & 56 Good      40,000    2025**

**Whites Creek Pk & Moorman's Arm Rd Inbound      Whites Creek**

**14      Poor      40,000    2025**

**N Gallatin Pk & Alta Loma Rd Soudbound & Northbound      Gallatin PK**

**26 & 56 Fair      40,000    2025**

**Gallatin Pk & Roosevelt Ave Northbound Gallatin PK**

**26 & 56 Fair      40,000    2025**

**N Gallatin Pk & Rivergate Pkwy Southbound      Gallatin PK**

**26 & 56 Poor      40,000    2025**

**S Gallatin Pk & Emmitt Ave Southbound      Gallatin PK**

**26 & 56 Poor      40,000    2025**

**Gallatin Pk & McKennie Ave Southbound Gallatin PK**

**26 & 56 Good      40,000    2025**

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**Lafayette St & 1st Ave S Eastbound      Murfreesboro PK**

**15 & 55 Good    40,000   2025**

**1st Ave S & Chestnut St Northbound      Murfreesboro PK**

**15 & 55 Fair      40,000   2025**

**Lafayette St & Fairfield Ave Eastbound      Murfreesboro PK**

**15 & 55 Good    40,000   2025**

**Recommended Action**

Nashville MTA will continue to make improvements access system wide. will be accomplished through independent Nashville MTA will make improvements to the bus stop network and by partnering with Metro Davidson County sidewalk projects planned throughout Davidson County. Stop improvements will be prioritized by available budget for improvements, proximity to scheduled road improvements, and customer needs and requests. \$150,000 per year is allocated for maintenance of existing stops. In addition, to purchasing new stop amenities such as benches and shelters; this budget item can be used for ADA compliance. Given the order-of-magnitude, these funds will be concentrated at high priority stop locations each year.

**ADA Coordinator**

WeGo Public Transit has identified an ADA Coordinator to oversee policies and procedures. It is the responsibility of the ADA Coordinator to implement this policy.

**Tanesha Simmons**

**WeGo Public Transit**

**430 Myatt Drive**

**Phone: (615) 880-3596**

**Fax: (615)880-3294**

**Email: [tanisha.simmons@nashville.gov](mailto:tanisha.simmons@nashville.gov)**

**Americans with Disabilities Act Grievance Procedure**

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**Complaints concerning discrimination on the basis of disability by We Go Public Transit may be sent to Tanesha Simmons call 615-880-3596 or email Tanesha.simmons@nashville.gov. Tanesha Simmons will contact within 15 calendar days after receipt of the complaint to discuss and will response in writing within 15 days of the discussion.**

## **Public Outreach**

### **Access Policy Advisory Committee**

**The Access Policy Advisory Committee (APAC) serves in an advisory capacity to the We Go Public Transit. Its purpose is to provide We Go Public Transit with recommendations on compliance with the Americans with Disabilities Act (ADA), facilitate a dialogue between We Go Public Transit and those with disabilities in the community, and increase the use of services by people with disabilities. The responsibilities of the committee include representing the interests of people with disabilities, providing comment on We Go Transit current services, policies, providing informed input on the development assessment of future We Go Public Transit projects, and services that impact people with disabilities.**

### **Mayor's Advisory Committee for People with Disabilities**

**The Mayor's Advisory Committee for People with Disabilities was created by executive order In July of 2000. The Committee consists of twenty-four to thirty-six advisors and officers. Membership is maintained so that one-third of the members are persons with disabilities, one-third are family members of persons with disabilities or advocates, and one-third are professional and business persons from both the private and public sectors, interested citizens, or elected officials. Committee members are appointed by the Mayor to serve up to two consecutive two-year terms. The Committee meets, at least, on a quarterly basis and has authority to adopt by-laws, elect officers, and establish sub-committees.**

**It is the Committee's mission to:**

**Promote public education and awareness of the contributions, potentials, and needs of individuals with disabilities and their families;**

**Advocate public and private policies and practices which promote self-determination and independence of persons with disabilities and their families;**

**Coordinate local activities on behalf of people with disabilities and their families;**

**Work with a liaison from the Mayor's office to make recommendations to the Mayor and to respond to inquiries from the Mayor concerning problems that need to be addressed involving disabled individuals; and work with the ADA Implementation Committee, when requested, to address problems confronting people with disabilities.**

## **Conclusion**

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**The plan focused on the self-evaluation and transition plan for WeGo public transportation focuses on the facilities, programs, communication, bus stops, and employment barriers. Moving forward WeGo Public will update transitional plan annually with completion of barriers found in the self-evaluation process.**