



# CITY OF CHATTANOOGA

## ADA SELF-EVALUATION & TRANSITION PLAN

*Progress Update 2019*

**cole**<sup>®</sup>

Power House at Union Station  
401 S. 18th Street, Suite 200  
St. Louis, Missouri 63103  
314.984.9887

CIVIL ENGINEERING / SURVEYING / PLANNING / LANDSCAPE ARCHITECTURE / GIS / ADA TRANSITION PLANNING



Cole & Associates, Inc., Life Quest, Access by Design, and Ragan-Smith performed the ADA Self-Evaluation, on behalf of the City of Chattanooga. The consultants and the City contributed to the content of the ADA Self-Evaluation & Transition Plan. Cole was responsible for the oversight of the project, in front of the design and drafting of the formal report.



# Table of Contents:

<b>1. Executive Summary</b>	<b>5</b>
Background .....	5
Report & Project Overview.....	6
<b>2. Introduction</b>	<b>9</b>
2.1 Federal Accessibility Requirements .....	10
2.2 Chattanooga ADA Self-Evaluation and Transition Plan Requirements.....	11
2.3 Discrimination and Accessibility .....	12
2.4 Undue Burden .....	13
<b>3. City of Chattanooga’s Self-Evaluation Scope</b>	<b>15</b>
3.1 Scope of the Self-Evaluation .....	15
3.2 Public Right-of-Way   City Facilities .....	16
3.3 Public Outreach .....	17
<b>4. Self-Evaluation - Approach</b>	<b>19</b>
4.1 Evaluation - Methodology.....	19
4.2 Approach to Public Right-of-Way Inventory Collection.....	20
4.3 Approach to Buildings & Facility Inventory Collection .....	21
4.4 Database Analysis .....	21
4.5 Survey Reports & GIS Integration .....	22
4.6 Prioritization Factors .....	23





# Table of Contents:

---

<b>5.</b>	<b>Summary of Findings</b>	<b>25</b>
	5.1 Introduction .....	25
	5.2 Policy/Program & Activity .....	25
	5.3 Physical Assets .....	28
<b>6.</b>	<b>Transition Plan Details</b>	<b>31</b>
	6.1 City Official Responsible .....	31
	6.2 Transportation Alternatives (TA) .....	32
	6.3 Prioritized Recommendations for Barrier Removal .....	33
	6.4 Implementation Schedule .....	33
<b>7.</b>	<b>Current ADA Policy &amp; Grievance Procedure</b>	<b>35</b>
	7.1 Policy .....	35
	7.2 Grievance Procedure .....	35
<b>8.</b>	<b>Project Schedule</b>	<b>37</b>
	8.1 Project Schedule .....	37





# 1. Executive Summary

## Background

The City of Chattanooga is a vibrant community located in southeast Tennessee. It has a population of over 179,000 people and the City takes pride in providing access to its many community assets not only through vehicular access, but also through its connected sidewalk network, pedestrian and bike trails, on-street parking facilities and an extensive transit system. The City plans to ensure equal opportunity for residents and visitors to the City of Chattanooga. As a result, the City has long established programs to provide a strong foundation for implementation of accessibility recommendations. The City of Chattanooga has various departments that are responsible for planning for people with disabilities. The City's policies and processes in this arena are influenced by the American's with Disability Act (ADA).

The American with Disabilities Act (ADA) became effective in 1991. It is a civil rights law that prohibits discrimination against individuals with disabilities in all areas of public life, including jobs, schools, transportation, and places that are open to the public. The purpose of the law is to make sure that people with disabilities have the same rights and opportunities as everyone else. The ADA was passed to prohibit discrimination against people with disabilities. Title II of The ADA requires that public agencies maintain an ADA Self-Evaluation and Transition Plan which details barriers identified and communicates an action plan for improving accessibility.

## Report & Project Overview

This report serves as an overview of the project that is underway to conduct Phase I of the Self Evaluation and update the City's Transition Plan. The project is being led by a multi-disciplined consultant with national expertise in ADA compliance review, ADA Self Evaluation and Transition planning, design and construction for public agencies. This Plan has been developed so the City can identify and work toward removing obstacles that limit access by people with disabilities to its programs, activities and services as required by the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act.

The regulations of the ADA require the following information be contained with the ADA Transition Plan:

- An inventory of barriers, or a self-evaluation
- A schedule for removing the barriers
- A description of the methods to be used to remove the barriers
- Public involvement
- Identification of the ADA Coordinator and the official responsible for implementation of the Plan
- Complaint and grievance policy

As a result, the City will conduct a multi-phase evaluation of its programs and facilities to determine the extent to which individuals with disabilities may be restricted to their access to City services, programs, activities and facilities.

Phase 1 includes the evaluation of thirty-two (32) individual buildings, park facilities and trails throughout the City of Chattanooga (see Section 3 for information on these locations). Phase 1 of the project will also evaluate the public right-of-way facilities for the area near and around downtown Chattanooga and Policies & Procedures for the City's Departments.

The consultant is working in concert with the City to customize the approach in data collection, prioritization, cost estimating, implementation and long-term data management to improve accessibility over time. The public right-of-way data is being collected using GIS and innovative technology to quickly and thoroughly evaluate barriers to access for sidewalks, curb ramps, pedestrian signals and transit stops. Parking is being evaluated for the required quantity and technical specifications. City buildings undergo a thorough review from pedestrian access routes, through doorways, service counters, drinking fountains, restrooms, signage and more. The features being evaluated in parks include playground elements, picnic tables and grills and accessible routes. The data is being collected and analyzed for conflicts under the required standards and recommended guidelines.

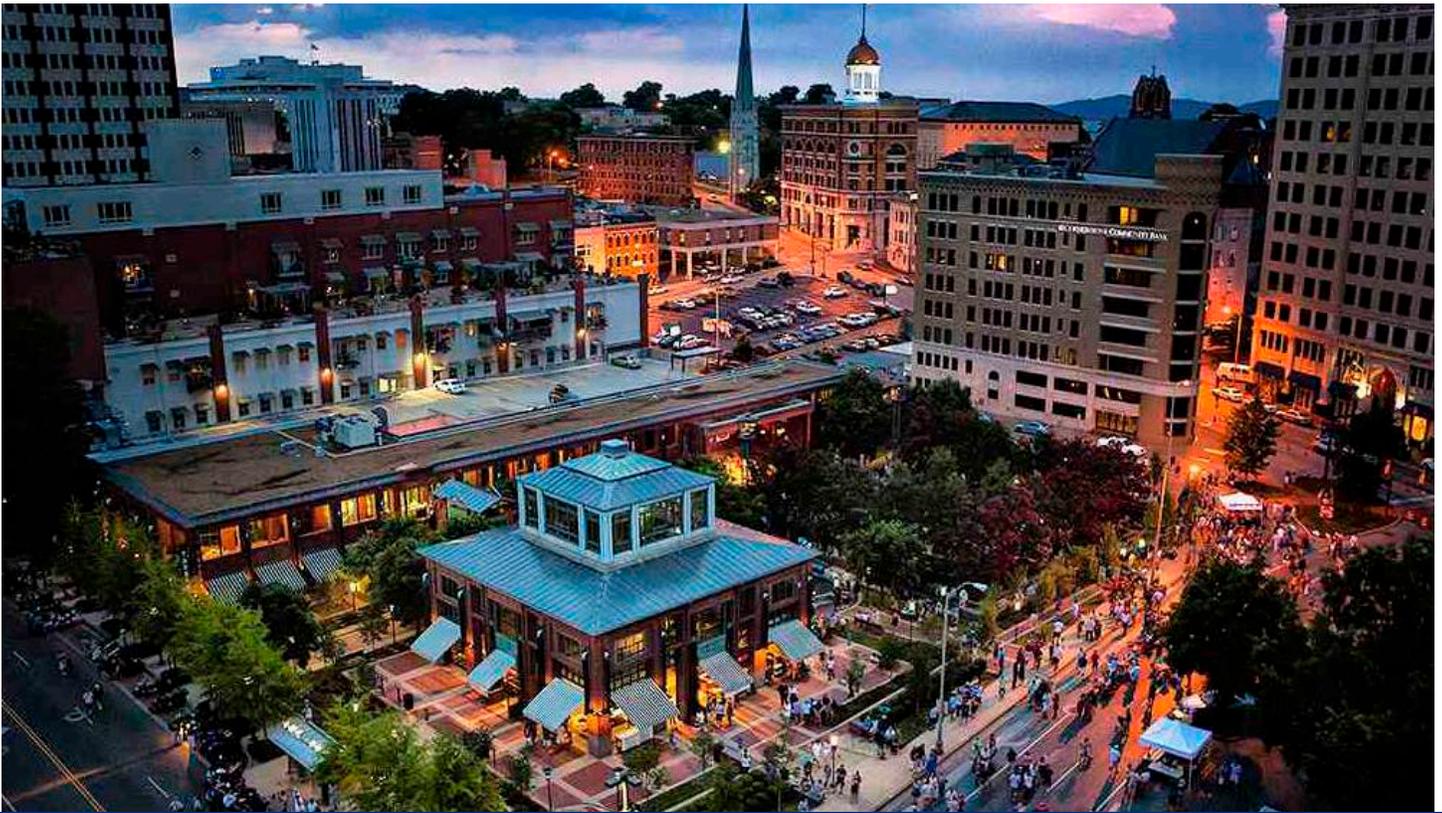
Prioritizing the conflicts is an important element of the transition plan. A severity ranking is being established based on the level of non-compliance and the impact of the barriers on the traveling public. Knowing what the challenges are and where they are located is only part of the information needed to have a plan. The City will establish a public outreach strategy, to ensure members of the community, especially those with disabilities, have an opportunity to be involved in the decision making. Through public information sessions and survey options, the City will evaluate input about the locations that are frequently visited and allow the public to assist in developing the prioritization to these locations. An activity score is being established based on public use. These priorities along with the severity rankings are combined to develop a final impedance score that is being used to identify areas of high, medium and low priority. With this knowledge, the City can better plan to address areas with the most egregious problems balanced with the areas of highest use and importance.

It is the intent of the City to address barriers to accessibility through prioritization, contingent upon City Council approval, depending on the immediate necessity, degree of complexity, and overall cost. Once the Self Evaluation is completed, Section 6.4 will be developed to include an Implementation Schedule.

The City of Chattanooga reserves the right to modify barrier removal priorities to allow flexibility in accommodating community requests, petitions for reasonable modifications from persons with disabilities, changes in City programs, on-going evaluations, funding constraints and funding opportunities.

Another important element of a Transition Plan is knowing who to contact if a person has questions about accessing City amenities. The City of Chattanooga ADA Coordinator is responsible for ensuring that Chattanooga programs, services, and activities are accessible to and usable by individuals with disabilities (see Section 6.1). The ADA Notice and Grievance Procedure is included in this report (see Section 7) and may also be found on-line at <http://www.chattanooga.gov/multicultural-affairs/americans-with-disabilities-act>.





## 2. Introduction

Chattanooga is conducting an updated ADA Self-evaluation and Transition Plan. This report in final format, will detail the process and schedule for accessibility improvements. This report affirms the City's ongoing commitment to remove barriers over a period of time, pending City Council approval, and provides inclusive access to Chattanooga's citizenry in its policies, programs, services, communications, parks, facilities, and public rights of way.

This report summarizes the City of Chattanooga's ADA Self-Evaluation and Transition Planning process that is being completed in accordance with the Americans with Disabilities Act (ADA).

It includes the following information:

- ADA Coordinator contact information;
- Standards and process to evaluate accessibility and non-discrimination efforts;
- Responsible parties to address accessibility and discrimination complaints;
- Sample Prioritization methods;
- Sample Public involvement activities;
- Typical barriers to services including physical assets such as intersections, sidewalks, signals, bus stops, parks, multi-use trails, buildings, parking;
- Recommendations to improve accessibility.

## 2.1 Federal Accessibility Requirements

A Self-Evaluation and Transition Plan of scheduled changes is required by the following:

### **Section 504 of the Rehabilitation Act of 1973 (Section 504)**

This regulation applies to organizations receiving federal funds. Programs and services are to be available, without discrimination, to people with disabilities. Various other federal and state entities require the plan as a condition of receiving federal funds, including the U.S. Department of Transportation.

### **The Americans with Disabilities Act (ADA)**

The ADA became law on July 26, 1990. The ADA covers a public entity's employment, programs, activities, services, communications, and facilities. The ADA adopted the prohibitions of discrimination established under Section 504. Updates to the ADA include the ADA Amendments Act of 2008 (ADAAA) and the 2010 ADA Standards for Accessible Design (2010 ADA). Other standards used in determining accessibility for sidewalks, crosswalks and more, include the proposed 2011 Public Right-of-Way Accessibility Guidelines (PROWAG). While the guidelines are not yet law, they are accepted as the best guidance for public right-of-way application by federal agencies. Compliance with these updates have been included in the Self-Evaluation process.

### **Background of the Federal Accessibility Requirements**

The development of an ADA Self-Evaluation is a requirement of the federal regulations implementing the Rehabilitation Act of 1973, which require that all organizations receiving federal funds make their programs available without discrimination toward people with disabilities. The Act, which has become known as the "civil rights act" of persons with disabilities, states that:

No otherwise qualified handicapped individual in the United States shall, solely by reason of handicap, 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 (Section 504).

Subsequently, Congress passed the Americans with Disabilities Act (ADA) on July 26, 1990. Title II of the ADA covers programs, activities, and services of public entities. The Department of Justice's (DOJ) Title II regulations adopt the general prohibitions of discrimination established under Section 504 of The Rehabilitation Act and incorporate specific prohibitions of discrimination for the ADA. Title II provides protections to individuals with disabilities that are at least equal to those provided by the nondiscrimination provisions of Title V of The Rehabilitation Act.

The ADA is a comprehensive civil rights law for persons with disabilities in both employment and the provision of goods and services. This civil rights law mandates equal opportunity for individuals with disabilities. The ADA prohibits discrimination in access to jobs, public accommodations, government services, public transportation and telecommunications. The ADA states that its purpose is to provide a "clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities." Congress emphasized that the ADA seeks to dispel stereotypes and assumptions about disabilities. The law is to assure equality of opportunity, full participation, independent living, and economic self-sufficiency for people with disabilities.

Since the original signing of the Americans with Disabilities Act, significant modifications and amendments have been made to the ADA statutes and the federal regulations implementing the ADA.

Specifically, under the ADA, public agencies may not, either directly or through contractual arrangements, do any of the following:

- Deny qualified persons with disabilities the opportunity to participate as members of advisory boards and commissions.

- Deny qualified persons with disabilities the opportunity to participate in services, programs, or activities that are not separate or different from those offered to others, even if the City offers permissibly separate or different activities.
- In determining the location of facilities, make selections that have the effect of excluding or discriminating against persons with disabilities.

Title II of the ADA provides that public entities must identify and evaluate all programs, activities, and services and review all policies, practices, and procedures that govern administration of the entity’s programs, activities, and services. This evaluation includes all of the public areas of the physical assets (such as facilities, buildings, parks, and streets) owned or operated by the City.

## 2.2 ADA Self-Evaluation and Transition Plan Requirements

The City of Chattanooga is committed to inclusion, non-discrimination, barrier removal and access.

ADA requirements for the City of Chattanooga:

- Evaluate programs, services, activities, communication and right-of ways per the ADA;
- Identify physical and other barriers that may limit access to programs and services;
- Propose potential compliance solutions;
- Determine estimated cost and the responsible party to implement solutions;
- Develop a time schedule for implementation.

Additionally, the ADA requires the City of Chattanooga to:

- Designate an ADA Coordinator responsible for overseeing compliance;
- Develop an ADA grievance procedure<sup>1</sup>;
- Maintain the Self-Evaluation and Transition Plan for public inspection for three years.




---

<sup>1</sup> Chattanooga’s ADA Grievance Procedure is detailed in Section 7.

## 2.3 Discrimination and Accessibility

Title II of the ADA and its related federal EEOC, DOJ and DOT regulations link the concepts of discrimination and access which include physical access and program access.

Physical access requires a facility be free of barriers preventing participation. Barriers are any obstacles that prevent or restrict access to or use of a facility, right-of-way, or park amenity as identified in ADA Title II, Section 35.149<sup>2</sup>.

Program access is defined by ADA Title II, Section 35.150(a)<sup>3</sup>. It may include physical accessibility, but also covers policies, practices, communications, and procedures. Program access requires that individuals with disabilities be provided an equally effective opportunity to participate in or benefit from programs and services. Program access may be achieved by either structural or non-structural methods. Non-structural methods include acquisition or redesign of equipment, assignment of auxiliary aids and assistance, or provision of services at alternate sites.

In general, both may be utilized to ensure program access, but there are some exceptions where existing facilities are involved. ADA Title II, Section 35.150:

- Does not require a public agency to make each existing facility accessible
- Does not require anything that impacts the historic significance of historic property
- Does not require a public agency to fundamentally alter services, programs, or activities
- Does not require a public agency to create hazardous conditions
- Does not require a public agency to incur undue financial and administrative burden
- Program access includes advertisement, orientation, eligibility, participation, testing or evaluation, physical access, provision of auxiliary aids, transportation, policies, and communication.

---

<sup>2</sup> **ADA Title II Section 35.149** provides that “Except as otherwise provided in § 35.150, no qualified individual with a disability shall, because a public entity’s facilities are inaccessible or unusable by individuals with disabilities, be excluded from participation in, or be denied the benefits of the services, programs, or activities of a public entity, or be subject to discrimination by any public entity.”

<sup>3</sup>ADA Title II, Section 35.150(a) **provides: A public entity shall operate each service, program, or activity so that the service, program, or activity, when viewed in its entirety, is readily accessible to and usable by individuals with disabilities.**

## 2.4 Undue Burden

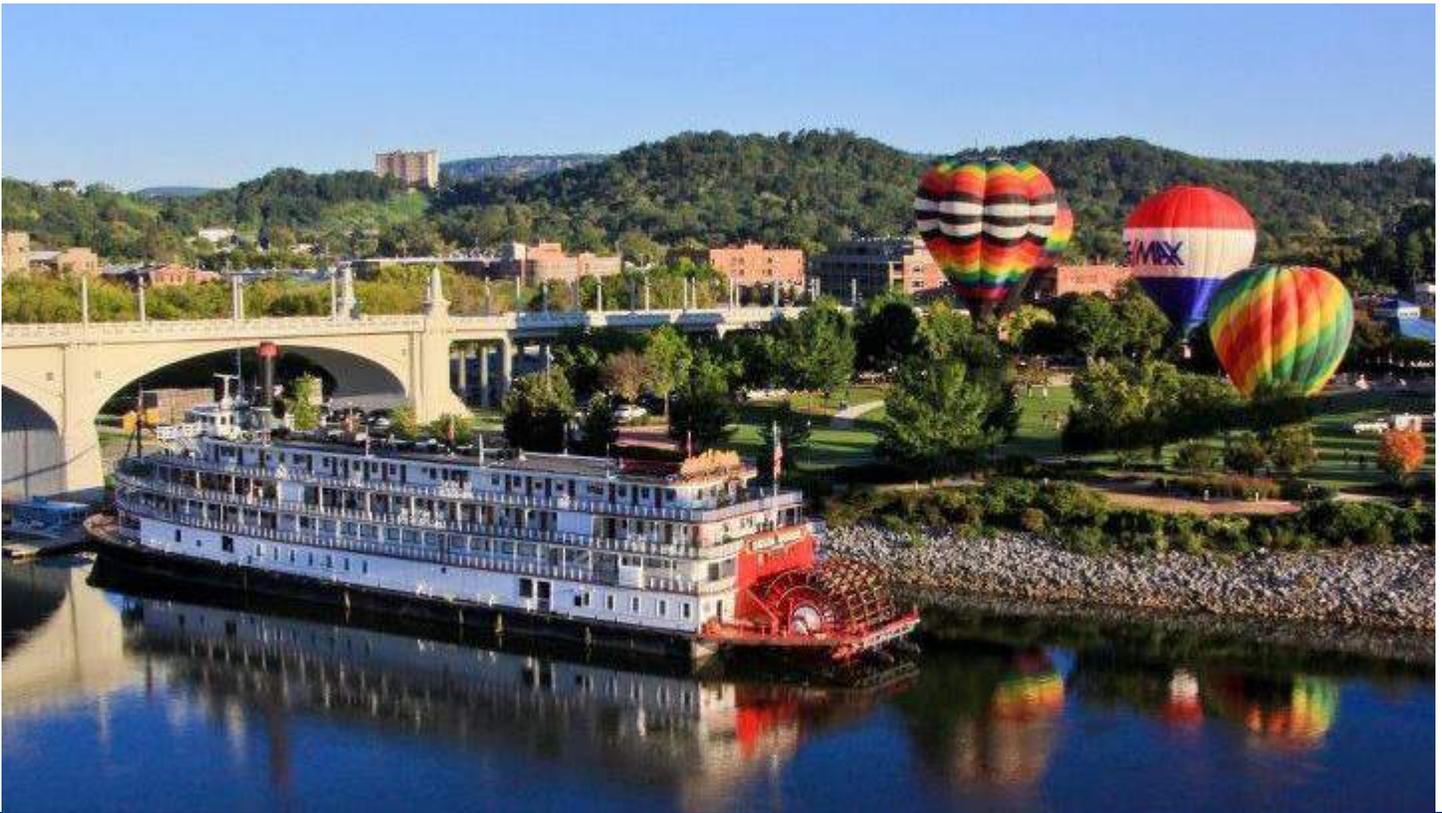
While it is rare the City of Chattanooga may not be able to provide program access, there are some instances where it is permissible under the ADA. Access to each service, program, or activity is to be “viewed in its entirety.” Program access does not require each facility be made physically accessible, in all instances. However, physical accessibility is a requirement for new facilities intended to provide City programs. The City is not required to incur undue financial or administrative burden.<sup>4</sup>

The decision that compliance would result in an undue burden must be made by the head of the public entity or his/her designee. Representing the City of Chattanooga, the City Manager or his designee has the authority to identify an undue burden. The decision is to be accompanied by a written statement of reasons for reaching that conclusion.

---

<sup>4</sup> **Undue Burden:** The determination that an undue burden would result from actions must be based on an evaluation of all resources available for use in the matter. Chattanooga must then consider options for providing access to the program that do not incur undue burden. The determination of “Undue Burden” may not be a permanent determination and should be continuously reviewed.





## 3. City of Chattanooga's Self-Evaluation Scope

Title II of the ADA provides that public entities must identify and evaluate all programs, activities, and services and review all policies, practices, and procedures that govern administration of the entity's programs, activities, and services.

### 3.1 Scope of the Self-Evaluation

The scope of the Self-Evaluation includes review of policy and procedures of City departments, as well as a review of select physical assets. The policy review of 17 departments is being performed by LifeQuest and Cole during Phase 1 of the project. For physical asset review, self-evaluation of existing City buildings, parks, trails, sidewalks, curb ramps, bus stops, accessible parking spaces and pedestrian signals is being performed within Phase 1, to identify potential barriers that might reduce their use by people who have disabilities. The information collected will better inform decision makers on how to plan and budget for improvements through the City's ADA Transition Plan.

In 2019 & 2020, Cole, along with Access by Design and Ragan-Smith Engineers, is performing a thorough physical assessment, also known as a "self-evaluation", of selected buildings, parks, trails, sidewalks, curb ramps and pedestrian signals within the public right-of-way. These facilities are being evaluated per the applicable ADA regulations and guidelines.

## 3.2 Public Right-of-Way | City Facilities

The project scope includes the following:

1. Public Right-of-Way (Street Corridors)
  - a. Sidewalks
  - b. Curb Ramps
  - c. Pedestrian Pushbuttons
  - d. Bus Stops
  - e. Accessible Parking Spaces
2. City Facilities
  - a. Chattanooga Outdoor Building LEED design
  - b. Tivoli theater
  - c. Memorial Auditorium
  - d. Bessie Smith Cultural Center
  - e. City Council Building
  - f. City Hall
  - g. Y-CAP Chattanooga
  - h. Chattanooga-Hamilton County Rescue Building
  - i. WellAdvantage Health & Wellness Center
  - j. Development Resource Center
  - k. North River Civic Center
  - l. Washington Hills Center
  - m. North Chattanooga Center
  - n. Frances B. Wyatt Arts Center
  - o. Frances B. Wyatt Center
  - p. East Chattanooga Center
  - q. Avondale YFD Center Concession
  - r. Avondale YFD Center
  - s. Tyner Center Concession
  - t. Tyner Center
  - u. Lookout Valley Recreation Center
  - v. Carver Complex
  - w. Carver Complex Neighborhood Assoc. Bldg.
  - x. Eastdale Center
  - y. Shepherd Center
  - z. John A. Patton Center
  - aa. South Chattanooga Center
  - ab. Brainerd Complex
  - ac. Heritage House
  - ad. East Lake Center
  - ae. East Lake Park Concessions
  - af. East Lake Senior Center

The inventory includes approximately 200 miles of sidewalk, 3000 curb ramp location, 500 bus stop locations, 50 accessible parking spaces, 200 pedestrian signal pushbuttons, one trail and 32 building facilities. An overview of the data collected and the cost summaries of the inventory analyzed for ADA compliance within the public right-of-way facilities and building facilities is located in Section 5 of this report. Once completed, detailed reports of the City's facilities is available upon request.

Data collected from this assessment will enable City staff to:

1. Determine if facilities, parks and parking areas comply with ADA Standards
2. Determine if sidewalks, curb ramps, pedestrian signal pushbuttons, transit stops, and on street accessible parking comply with the proposed PROWAG and the MUTCD
3. Identify portions of facilities, sidewalks or pedestrian access areas requiring modifications
4. Quantify the extent of the work required
5. Assign planning level cost estimates
6. Include the data in the City's Geographic Information Systems (GIS) database

City of Chattanooga's self-evaluation process will provide the information needed for the City to determine the proper prioritization of non-standard buildings, parks, and pedestrian facilities. These are being evaluated thoroughly and documented in the self-evaluation inventory report to identify corrective measures. The City will also seek public input on this decision-making process to rank the barriers to be removed, and in what order. While the prioritization methodology to evaluate the severity of barriers and the level of pedestrian use of the facilities is robust (as described in Section 4.6), the opportunity to gain public input is of great importance, as well. Recognizing that the City of

Chattanooga has limited funds and cannot make all barriers identified with the building, parks and public right-of-way facilities fully accessible immediately, the Implementation Schedule within the upcoming Transition Plan will set forth the priorities for making access modifications over time.

### 3.3 Public Outreach

Thorough public outreach strategy sessions are being developed by the consultant and staff in conjunction with various city departments, to ensure that members of the community living with disabilities will have an opportunity to be informed and provide feedback to the City of Chattanooga. The event will be promoted publicly through various city communication vehicles.

#### Outreach strategies included:

- **Public Outreach Open Houses: Two presentations will be conducted. Full accommodations will be made available, if requested.**
- **Live & Recorded Viewing:** For individuals unable to attend in person, the live session will be recorded. A video of one of the sessions will be made available as a recorded viewing opportunity during the public comment period.
- **A Public Survey:** A public survey will be available to allow valuable feedback from the community on accessibility.

#### Public Outreach Information Details

**Summary of Findings Report** will document the preliminary results and information of general findings from the ADA Self-Evaluation. This report will be available for participants during the public outreach sessions and also made available electronically for those unable to attend.

**Electronic publicity of the Public Outreach Sessions and Community Survey** will be made available online to ensure all citizens have an opportunity to understand the City's findings and to gain valuable feedback from the disability community and citizenry at large. A video of the live public outreach session will be available for viewing for those who cannot attend open sessions.

**Public Comment Period** will be a minimum of 30 days, allowing citizens to review the Summary of Findings Report and provide any insights or feedback via the survey regarding areas of priority throughout the City. Feedback received on areas of concern allow for additional consideration as the City prepares to prioritize sites for remediation both short- and long-term. The public survey allows for question and answer, as well as direct comments from the public.

See the project schedule in Section 8 for more information on public outreach timing.





## 4. Self-Evaluation - Approach

*A comprehensive inventory of barriers is being conducted. The following describes the approach.*

### 4.1 Evaluation Methodology

Methodology of assessment for the City of Chattanooga is broken into two components:

- a. Review of current programs, policies and services, and
- b. Review of physical assets which include features within the public right-of-way and also city buildings and parks.

The method of conducting the self-evaluation for review of its current programs, activities and services that govern its administration followed a best practice. With some specific exceptions unique to the DOJ's 2010 ADA Title II revised regulations, the basis of the self-evaluation process was the worksheets and questionnaires provided in the ADA Title II Action Guide technical assistance document published 1992 by Adaptive Environments Center, Inc. This resource, specifically reviewed by the DOJ for accuracy, is still an outstanding tool for conducting an ADA self-evaluation process.

The method of conducting the self-evaluation for the City of Chattanooga for physical assets will include field data collection to determine compliance with the following standards and guidelines:

1. 1991 ADA Standards
2. 2010 ADA Standards for Accessible Design
3. Section 504 of the Rehabilitation Act (504)
4. Proposed Public Right-of-Way Accessibility Guidelines, 2013 (PROWAG)
5. Tennessee Department of Transportation Standards

6. Federal Highway Administration Manual on Uniform Traffic Control Devices for Streets & Highways
7. U.S. Department of Transportation Regulations for transit and sidewalks

These documents are used to define the methods used to make facilities accessible.

## 4.2 Approach to Public Right-of-Way Inventory Collection

The Consultant team created and utilized a geodatabase using the ESRI ArcGIS system. The customized fields for Geodatabase include location, directions, size, features and obstruction size. Data structure was pre-programmed for public right-of-way facility collection. Data is then logged into a project database and analyzed for compliance.

The traditional accessibility inventory process in the public right-of-way can be labor intensive while still offering inexact information. Many public entities rely on collection methods that provide limited information or assess barriers intermittently. This does not offer precise data or allow for accurate cost estimates for barrier removal. City of Chattanooga indicated an interest in utilizing a technology that would quickly and accurately document the type, severity, and location of sidewalk and curb ramp barriers in and along the Phased limits. The City contracted with Cole, to utilize an exclusive technology called the ULIP-ADA<sup>5</sup> to allow for an efficient and effective process to complete the City's assessment for pedestrian infrastructure within the public right-of-way.

The technology was originally developed through a pilot program funded by the Federal Highway Administration. The Ultra-Light Inertial Profiler (ULIP) is mounted on a Segway. The device's displacement laser, three accelerometers, optical trigger, distance measurement instrument, and gyroscope are designed to measure the sidewalk surface at a rate of 10,000 records per second. Together, these devices capture highly accurate information about cross and running slope and small surface variations. A mounted computer, or Toughbook tablet, offers an interactive display during data collection. The technical precision offered by this technology was identified as a best practice in ADA Compliance at Transportation Agencies: A Review of Practices (NCHRP 20-07 Task 249), a National Cooperative Highway Research Program study.

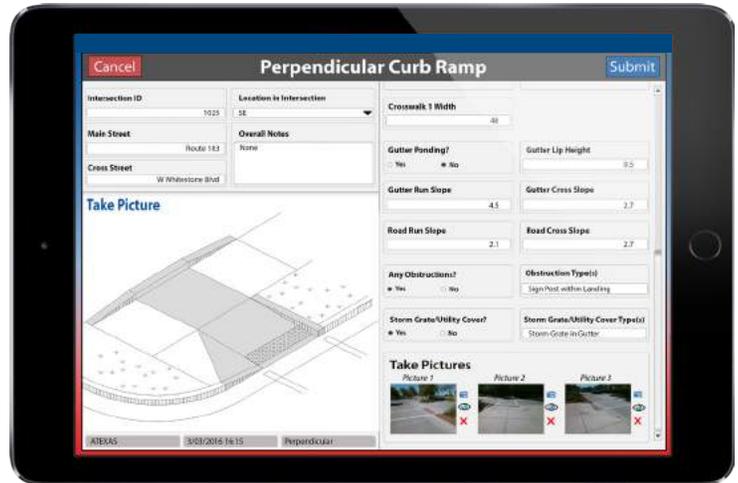
Field Data Specialists also collect the required information for the curb ramps, bus stops, accessible parking and signal pushbuttons throughout the defined project areas. Customized data collection software based on the proposed PROWAG recommendations and the MUTCD is the backbone for curb ramp and pushbutton validation criteria. Field Specialists enter data directly into the data collectors, based on inspection and measurements of the existing features ensuring that all relevant characteristics is recorded, photos and video are properly linked, and accurate location data is logged in the database.




---

<sup>5</sup> The ULIP-ADA was listed as a best practice in ADA Compliance at Transportation Agencies: A Review of Practices (NCHRP 20-07 Task 249), a National Cooperative Highway Research Program study. "ULIP" stands for Ultra-Light Inertial Profiler. The ULIP has been upgraded over many years to the current ULIP-ADA version 3.0.

Throughout the collection process, data collection, data validation, and linking to location and digital photo files happens automatically as the Field Data Specialists enter data and move from point to point. The Field Data Specialists then access the data entry, validation forms and aerial orthophoto images along with right-of-way, utility, topographic, or other feature data sets that are preloaded and appear on the data collectors for easy reference in the field. Digital photos are automatically logged for location and linked to the database, based on synchronized time and date stamps.



Quality control is an important aspect of field data collection. Mobile GIS removed the error-prone conversion of spatial data from paper maps to digital format by synchronizing digital files directly between a hand-held device and the desktop GIS. A custom routine is run on the collected data regularly to check for errors or missing information. The data is synced directly to a GIS database thus reducing the risk of errors in data conversion. This ultimately creates a streamlined approach to understanding and evaluating barriers and the cost estimations for barrier removal to allow for effective planning for pedestrian access within the City's public right-of-way.

### 4.3 Approach to Buildings & Facility Inventory Collection

Each facility is evaluated beginning at the public sidewalk, including sidewalks and routes to building entrances, accessible parking, curb ramps and ramps. Building interior elements includes transaction counters, meeting and community rooms, classrooms, assembly spaces, library stacks, gymnasiums, pools, childcare areas, exhibits, detention areas and any other areas where City programs are offered. Support Spaces such as public restrooms, locker rooms, shower rooms, drinking fountains and alarm systems are also evaluated for compliance.

Surveyors use electronic data collectors to collect and process data efficiently and effectively to a database of information.

### 4.4 Database Analysis

City of Chattanooga's sidewalk and public right-of-way facilities data provides staff geographic data with:

1. Positional accuracy, the digital representation of a barrier conforms to the actual location found in the field;
2. Attribute accuracy, the digital representation of a barrier is represented in a manner that best represents actual conditions found in the field (% running slope, % cross-slope, inches of vertical separation, etc.).

Building and Facility data results includes field measurements and data collection to determine compliance. Guidance for public right-of-way facilities in defining the method with which to assess the data is found in Designing Sidewalks and Trails for Access (FHWA, 1999). This report advises that grade and cross-slope "should be measured over 2 ft. intervals, the approximate length of a wheelchair wheelbase, or a single walking pace."

Adherence to FHWA's interpretation of features in the data set provided quality assurance in the attribute accuracy of the resulting database. Building and City Facilities use the following standards to determine compliance:

- 1991 ADA Standards (buildings built/renovated prior to 3/15/12)
- 2010 ADA Standards (buildings built/renovated on or after 3/15/12)

Once the field data collection and validity checks are performed, the raw data is processed so it could be stored in the City’s centralized GIS database for analysis and reporting. GIS plays a pivotal role in the project from data acquisition (organizing the millions of data points generated during the study) to creating an ArcPad user interface for asset management and compliance monitoring. Additional available data point attributes can be used for compliance tracking. Compliance reporting capabilities will be available to deploy and to track progress.

### 4.5 Survey Reports & GIS Integration

The team will create survey and cost reports for each facility type, i.e. right-of-way, parks, parking lots, etc.

The team surveys the compliance status of each location to identify:

- List of locations that do not comply with current standards
- Recommended actions per location to resolve non-compliance
- Prioritized recommendations for removing barriers using criteria from the consultant team and Chattanooga staff, taking in consideration public comments
- Cost report that assigns conceptual budget estimates
- Photo log or Video log summary for each location

Data is integrated into Chattanooga’s GIS mapping system, to allow for analysis and resolution planning of locations that are out of compliance

### 4.6 Prioritization Factors



## **Facilities, Parks, Parking, and Pedestrian Access to the Public Right-of-Way**

- Priorities for removing barriers are indicated as: “High, Medium, or Low.”
- Ranking of the following criteria is completed before a final priority is determined:

**Program Availability:** The number of programs available at a location and those unique to a location, such as a recreation program, indicate its importance to the community.

**Level of Use:** Facilities used more frequently are generally given a higher activity rank.

**Severity:** Ranking of “High, Medium, or Low” degrees of non-compliance, safety, and usability, such as:

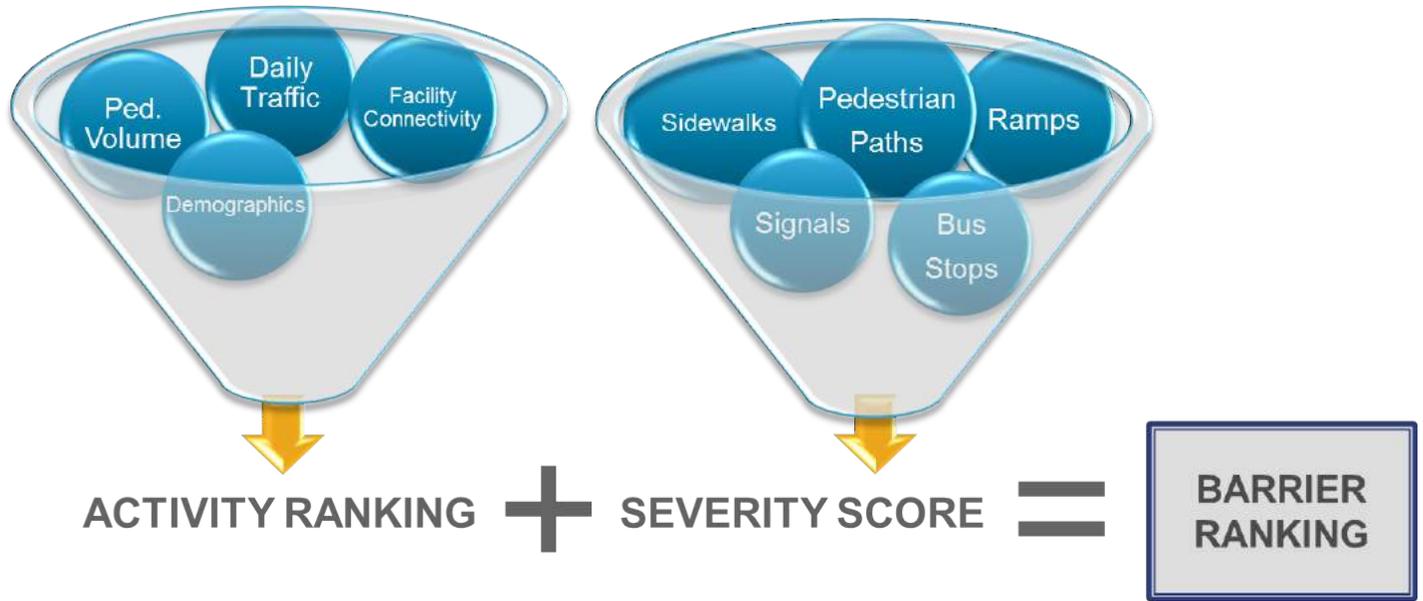
1. Steepness of curb ramps
2. Lack of curb ramp
3. Sidewalk with excessive cross slope
4. Missing Detectable Warning Systems (DWS)
5. Obstructions & protrusions
6. Insufficient space for boarding at bus stops
7. Parking spaces with no accessible route
8. Missing portions of sidewalks and paths

**Activity Factors:** Activity scores include the likelihood of usage based on:

1. Government offices and facilities
2. Transportation corridors, including pathways leading to schools
3. Transit stops
4. Proximity to parks and recreation facilities
5. Commercial and business zones
6. Retail businesses
7. Housing locations with a known concentration of persons with disabilities and elders

**Geographic Distribution:** Distribution of key facilities throughout the City ensuring maximum access and dispersal of amenities.

**Public Outreach:** Information from individuals with disabilities and their communities were incorporated in prioritizing locations needing attention first.



Prioritization Factors will be determined with the city, per the schedule in Section 8.



## 5. Summary of Findings & Recommendations

### 5.1 Introduction

The Summary of Findings will provide a high-level overview of the results of the self-evaluation for both policy review as well as the physical assessment of City buildings, facilities, parks and public right-of-way. Please see Section 3 for information regarding the scope included; please see Section 4 for details on the methodology used to complete the assessments for ADA compliance. **Sections 5.2 and 5.3 cover general information about the process; actual common findings will be shared once the self-evaluation review is complete.**

### 5.2 Policy/Program & Activity

An evaluation of the City's current services, policies, and practices will be completed as part of the update to the ADA Self-Evaluation. It identifies policies, procedures and practices that may not meet, or are inconsistent with, the requirements of the Title II regulations. To the extent modifications of the services, policies and practices are required; the City is expected to make such modifications.

Following approval of this Update, non-structural policy modifications are expected to be made as soon thereafter as is reasonably possible.

An overview of typical findings identified are summarized below:

### **General Recommendations**

- Customer Service Training for Departmental Service Counters
- Familiarize Counter Staff with General Customer Accessibility Available
- Basic Communications Equipment in each Department
- Training on Service Animals
- Train Staff on Accessible Meeting Protocols

### **Specialized Accessible Programs**

- “Specialized” programs or services for participants with disabilities
- Parks and Recreation include the most programs and services for participants with disabilities

### **Customer Service Recommendations**

- Coordinate with Outside Partners/Contractors on ADA Issues
- New Policies on “Reasonable Accommodation” requests and denials – Supervisor Duties
- Document Requests for Accommodations and Responses with ADA Coordinator
- Rely on Current Grievances Process to resolve Customer Complaints

### **Recommendations for Sign Language Contractors**

- Ensure Departments are clear on the City Policies related to Sign Language
- Add Statement of Availability of Alternate Formats to Departmental Documents and Website Pages

### **Chattanooga TV Accessibility Recommendations**

- [Need to discuss with City. Chattanooga TV currently includes closed captions on most broadcasts. Broadcast on WTCI \(PBS\)](#)
- [Use sign language interpreters when broadcasting emergency situations](#)

### **Public Commission Recommendations**

- Add “Non-Discrimination” Statement on all Event Notices
- Reach Out Regularly to Local Disability Rights Groups for Advice
- Add “Reasonable Accommodations/Modification” Statement on All Event Notices

### **Boards/Commissions/Committees & General Public Meetings Recommendations**

- Continue the Current Practice of Holding Meetings in Accessible Locations
- Incorporate more Assistive Listening Systems at meeting locations
- Have organizers use ADA Meeting Checklist
- Training organizers on availability of Sign Language, CART, etc. for meetings
- Adjust conventional time limits for public speakers with speech or intellectual challenges

### **Departmental Tours & Tips**

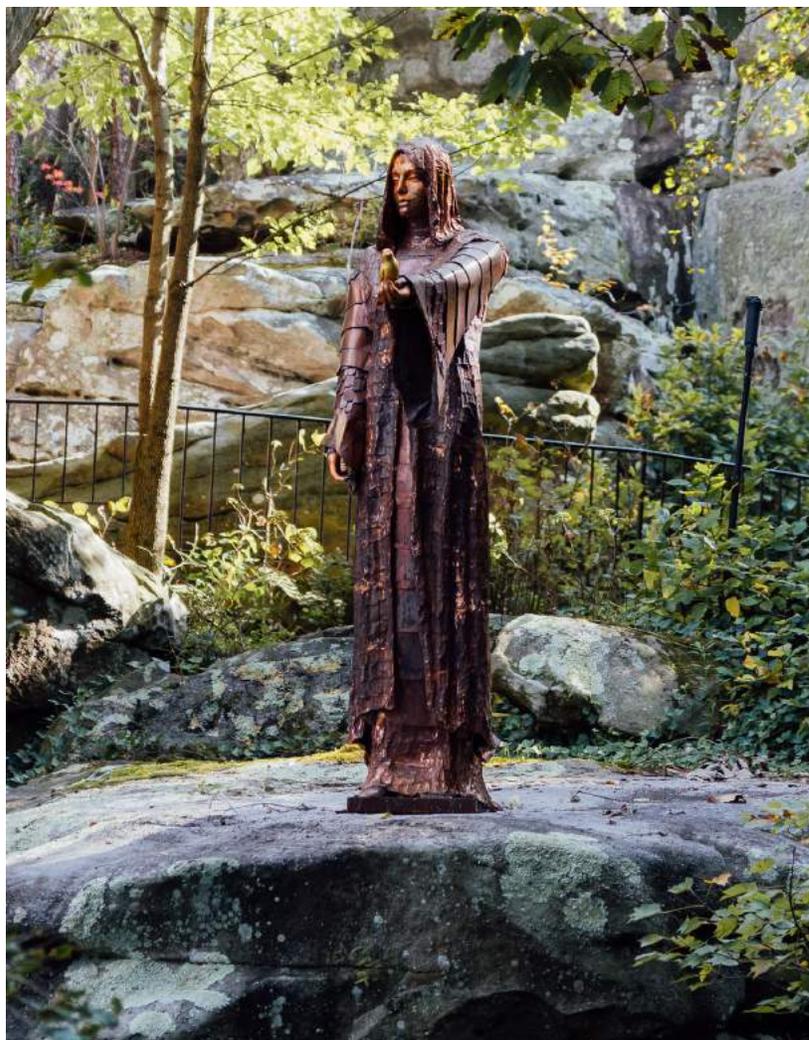
- Coordinate with accessible transportation providers to accommodate those with disabilities who participate in tours
- Confirm tour routes are accessible for those with mobility impairments and if not, provide appropriate alternate means of presenting the key areas of the tour

### **Special Events on City Properties**

- Coordinate with event sponsors for ADA compliance – accessible parking, accessible routes, venue accessibility, accessible restrooms, communications, transportation, marketing, etc.

### **Maintenance of Accessible ADA Policies**

- Periodically each of the Departmental ADA Liaisons need to confirm ADA policies and practices are still appropriate as required



## 5.3 Physical Assets

### Public Right-of-Way

The City of Chattanooga Phase 1 public right-of-way assessment will generate a significant amount of information regarding the accessibility of public right-of-way within the defined boundaries. A total of approximately 200 miles of sidewalk along a single side of a street block, 3,000 curb ramps, 500 bus stops, 50 accessible parking spaces, 200 signal pushbuttons and 32 separate building facilities are being evaluated.

The following lists represent a summary of typical observations regarding the information gathered. The Compliance Reports for each individual pedestrian facility will be available upon request.

### Sidewalk Inventory Data

1. Sidewalk obstruction
2. Sidewalk changes in level (heaves)
3. Sidewalk cross slope
4. Sidewalk run slope
5. Sidewalk connectivity
6. Sidewalk gaps

### Signal Inventory Data

Detailed documentation and data on the accessibility of City signals will be available upon request. Typical observations are listed below.

1. Pedestrian pushbuttons
2. Pedestrian pushbutton height
3. Locator tone (partial APS)
4. Clear floor space
5. Pushbutton side reach distance

### Bus Stop Inventory Data

Detailed data on the accessibility of City's Bus Stops will be available upon request. Typical observations are listed below.

1. Missing bus pads
2. Bus pad size
3. Bus pad slopes

### Accessible Parking Inventory Data - In Public Right-of-Way

Detailed documentation and data on the accessibility of City's on-street accessible parking spaces will be available upon request. Typical observations are listed below.

1. Accessible parking slopes
2. Accessible parking signage

## **Curb Ramp Evaluation**

Numerous types of curb ramps are being identified. Typical observations are listed below..

1. Curb ramp width
2. Curb ramp slope
3. Landing slope

As a part of the total sidewalk facility, the crosswalk must be accessible to everyone, including people with disabilities.

The ADA states:

*...pedestrian walkways must contain curb ramps or other sloped areas at intersections to streets, roads, or highways.*

The MUTCD defines an intersection:

*The area embraced within the prolongation or connection of the lateral curb lines, or if none, the lateral boundary lines of the roadways of two highways that join one another...*

The MUTCD defines a crosswalk:

*That part of a roadway at an intersection included within the connections of the lateral lines of the sidewalks on opposite sides of the highway measured from the curbs or in the absence of curbs, from the edges of the traversable roadway, and in the absence of a sidewalk on one side of the roadway, the part of a roadway included within the extension of the lateral lines of the sidewalk at right angles to the center line...*

4. Curb ramp running slope
5. Curb ramp cross slope
6. Landing slopes
7. Detectable warnings
8. For curb ramps that did not pass the Initial Pass/Fail data collection analysis, no further data collection will be performed on remaining curb ramp components.

## **Building & Facility Survey**

Almost every facility has some issues with the accessible routes from public sidewalks and accessible parking – cross slope, running slope and/or changes in level along sidewalks due to heaving. Curb Ramps are also commonly found to have cross slope and running slope issues.

Common interior issues include inaccessible transaction counters and protruding objects in circulation paths. Toilet rooms typically have a wide variety of issues, both large and small, including inoperable stall door closers, baby changing stations that are too high, lavatories with missing drainpipe insulation or inadequate knee space, coat hooks that are too high, water closets with center line issues and grab bars improperly installed.





## 6. Transition Plan Details

The Updated Transition Plan will provide a schedule by which the City facilities, will be prioritized within an implementation schedule that outlines timing and planning level cost estimates for remediation over time. Detailed reports provide the barrier information and barrier removal options. These reports guide the City of Chattanooga's planning for barrier removal based on the priorities utilizing numerous strategies.

Not all barriers must be removed to provide program access. The highest priority is to remove those barriers that limit access to city programs or present safety concerns. Barrier priorities and ranking methodology is discussed in Section 4.6. Due to the volume of individual reports, the ADA Transition Plan Report will summarize the findings and addresses the City's action plan to remove barriers over time. The individual reports will be available by contacting the ADA Coordinator for access to the detailed information.

### 6.1 City Official Responsible

The ADA Coordinator is responsible for ensuring that Chattanooga programs, services, and activities are accessible to and usable by individuals with disabilities. The City's ADA Coordinator is:

Toni Morgan,  
Office of Multicultural Affairs and/or Compliance Officer

City of Chattanooga  
100 E. 11th Street, Suite 101  
Chattanooga, TN 37402

Phone: 423-643-8240  
e-mail: [oma@chattanooga.gov](mailto:oma@chattanooga.gov)

For questions regarding the ADA Transition Plan, or to request an ADA accommodation or file an ADA complaint, please contact the ADA Coordinator or see [www.chattanooga.gov/multicultural-affairs/americans-with-disabilities-act](http://www.chattanooga.gov/multicultural-affairs/americans-with-disabilities-act).

## 6.2 Transportation Alternatives (TA)

The City will take full advantage of various funding opportunities that may come available for ROW accessibility improvements. This may include funds from the following:

- TIGER - 2020 BUILD Transportation Discretionary Grants
- TIFIA - Transportation Infrastructure Finance & Innovation Act
- FTA - Federal Transit Capital, Urban & Rural Funds
- ATI - Associated Transit Improvement
- CMAQ - Congestion Mitigation/Air Quality Program
- HSIP - Highway Safety Improvement Program
- NHPP - National Highway Performance Program
- SRBG - Surface Transportation Block Grant Program
- TA - Transportation Alternatives Set-Aside
- RHC - Railway-Highway Crossing Program
- RST - Road Safety and Technology
- RTP - Recreational Trails Program
- SRTS - Safe Routes to School
- PLAN - Statewide Planning & Research or/Metropolitan Planning Funds
- NHTSA 402/405 - State & Community / National Priority Safety Programs
- FLTTP - Federal Lands & Tribal Transportation Programs

Please see the table below for examples of how these sources may be utilized.

The City may explore partnerships to fund accessibility utilizing state and federal grants. Allocation of annual departmental budgets, maintenance funds, special taxing districts, already scheduled/funded Capital Improvement Program (CIP) projects, bond funds, Community Development Block Grant (CDBG) Funds and Highways User Revenue Funds may be other sources for projects as well as private funds from foundations, private development, and private individuals.

Additional funding information may be found at FHWA's web page: [Pedestrian and Bicycle Funding Opportunities](#)

### Pedestrian Program Funding Opportunities

PEDESTRIAN FACILITIES								
Federal Funding Sources	Curb Ramps	Signals	Sidewalk	Crosswalks	Trails	Bus Stops	Safety	Training
TIGER 2020 BUILD	•	•	•	•	•	•		
TIFIA	•	•	•	•	•	•		
FTA	•	•	•	•		•		
ATI	•	•	•	•		•		
CMAQ	•	•	•	•	•	•		•
HSIP	•	•	•	•	•			•
NHPP	•	•	•	•	•	•		
SRBG	•	•	•	•	•	•	•	•
TA	•	•	•	•	•	•	•	•
RHC			•					
RST		•						
RTP	•		•	•	•			•
SRTS	•	•	•	•	•		•	•
PLAN							•	•
NHTSA 402/405							•	•
FLTTP	•	•	•	•	•	•		

### 6.3 Prioritized Recommendations for Barrier Removal

The City of Chattanooga may choose to modify priorities to allow flexibility in accommodating community requests, petitions for reasonable modifications from persons with disabilities, changes in City programs, ongoing evaluation and funding constraints and opportunities.

It is not financially feasible to remove all barriers to access immediately. It is the goal of the updated ADA Transition Plan to provide access to the programs, activities and services provided by the City. The City of Chattanooga has on-going programs that monitor proposed alteration projects and include the review of the various accessibility concerns identified, in order to bring facilities to current ADA standards when projects take place. The City plans to remove barriers over time, as will be indicated by a completed Implementation Schedule. Sidewalk corridors, trails, buildings and parks identified barriers will be addressed based on their priority by the City and with available funds.

### 6.4 Implementation Schedule

Because the City of Chattanooga has many rights-of-way locations, parks, and facilities, it is not possible to remove all barriers immediately. Barriers will be removed systematically, citywide, to ensure equality among City programs. It is the intent of the City to address barriers to accessibility over thirty years, contingent upon City Council approval, depending on the immediate necessity, degree of complexity, and overall cost.

The City of Chattanooga reserves the right to modify barrier removal priorities to allow flexibility in accommodating community requests, petitions for reasonable modifications from persons with disabilities, changes in City programs, on-going evaluations and funding constraints and opportunities.

In addition to CIP programs, other development initiatives will include opportunities to provide ADA compliance. The City may elect to apply an annual approved budget with ADA remediation components built in to the budget, subject to City Council approval. **A detailed Implementation Schedule will be provided as a part of the Transition Plan.**





## 7. Current ADA Policy & Grievance Procedure

### 7.1 Policy

It is the policy of the City of Chattanooga that we will honor all requests for ADA accommodation when at all possible. The ADA Notice and Grievance Procedure is posted on-line at: [www.chattanooga.gov/multicultural-affairs/americans-with-disabilities-act](http://www.chattanooga.gov/multicultural-affairs/americans-with-disabilities-act).

### 7.2 Grievance Procedure

#### Grievance Procedure Under the Americans with Disabilities Act

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

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

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

Toni Morgan,  
Office of Multicultural Affairs and/or Compliance Officer

City of Chattanooga  
100 E. 11th Street, Suite 101  
Chattanooga, TN 37402

Phone: 423-643-8240  
e-mail: [oma@chattanooga.gov](mailto:oma@chattanooga.gov)

### **After Filing a Complaint**

Within 15 calendar days after receipt of the complaint, the ADA coordinator or his/her designee will meet with the complainant to discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting, the ADA coordinator or his/her designee will respond in writing, and where appropriate, in a format accessible to the complainant. The response will explain the position of the City of Chattanooga and offer options for substantive resolution of the complaint.

If the response by the ADA coordinator or his/her designee does not satisfactorily resolve the issue, the complainant and/or his/her designee may appeal the decision within 15 calendar days after receipt of the response to the City Manager or his/her designee.

Within 15 calendar days after receipt of the appeal, the City Manager or his/her designee will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, the City Manager or his/her designee will respond in writing, and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint.

All written complaints received by the ADA coordinator or his/her designee, appeals to the City Manager or his/her designee, and responses from these two offices is being retained by the City of Chattanooga for at least 3 years.



# 8. Project Schedule

ACTIVITY	START	END	NOTES
Project Kick Off Meeting	10/31/19	10/31/19	
Receive GIS Data and Setup	9/25/19	10/7/19	
Conduct Self Evaluation	10/8/19	3/13/2020	
Progress Meeting	TBD	TBD	Actual meeting date TBD
Document Development & Cost Estimating	3/23/2020	4/20/2020	
Summary of Findings Meeting	4/28/2020	4/28/2020	Actual meeting date TBD
City Reviews Findings & Provides Feedback	4/29/2020	5/27/2020	
Public Outreach Coordination	5/27/2020	6/26/2020	
Public Outreach Workshop & Survey	6/30/2020	6/30/2020	Actual meeting date TBD
Prioritization & Implementation Schedule	7/1/2020	7/8/2020	Ongoing after Public Outreach
Update Transition Plan	7/8/2020	7/22/2020	
City Review Transition Plan	7/22/2020	8/5/2020	
Final Transition Plan presented to City	8/10/2020	8/10/2020	
GIS Integration	8/11/2020	8/12/2020	