



January 2020

ADA Transition Plan

Volume 1 of 2

RTC 17-15

Kimley-Horn Project No. 092528009



Kimley»Horn



[ADA Transition Plan

VOLUME 1 OF 2

FOR

ADA TRANSITION PLAN

Prepared for:



Regional Transportation Commission of Washoe County
Planning
1105 Terminal Way
Reno, Nevada 89520
775-348-0480

Prepared by:

Kimley»»Horn

Kimley-Horn and Associates, Inc.
5370 Kietzke Lane
Suite 100
Reno, Nevada 89511
775-200-1979

Please contact the RTC Metropolitan Planning Division at 775-348-0480 to obtain Volume 2.

This document, together with the concepts and designs presented herein, as an instrument of service, is intended only for the specific purpose and client for which it was prepared. Reuse of and improper reliance on this document without written authorization and adaptation by Kimley-Horn and Associates, Inc. shall be without liability to Kimley-Horn and Associates, Inc.

© January 2020
092528009

2020-01-08 Draft ADA Transition Plan Volume 1.docx



ACKNOWLEDGEMENTS

The Regional Transportation Commission of Washoe County Technical Advisory Committee members were instrumental in the development, review and refinement of this ADA Transition Plan. The Regional Transportation Commission and Kimley-Horn and Associates, Inc. would like to express their appreciation to the Technical Advisory Committee members and their supporting staff for their participation and contributions.

Regional Transportation Commission

Rebecca Kapuler, Project Manager
Lauren Ball
Sharon Britt
David Carr
Nicole Coots
Amy Cummings
Dan Doenges
Mark Maloney
Julie Masterpool
Michael Moreno
Ed Park
Angela Reich
James Weston
Tina Wu

Consultant Team

Molly O'Brien, Project Manager
Heather Stifanos
Erin Eurek
David Giacomini
Tiffany Iverson
Devin Moore
Matt Pool
Kristi Avalos (Accessology)
Steven Lewandoski (Accessology)

ADA Transition Plan

1. INTRODUCTION	1
1.1. Americans with Disabilities Act	1
1.2. Section 504 of the Rehabilitation Act	2
1.3. ADA Self-Evaluation and Transition Plan Development Requirements and Process	2
1.4. Discrimination and Accessibility	3
1.5. RTC Approach	4
1.5.1. Efforts to Date	4
1.5.2. Ongoing Accessibility Improvements	4
2. PUBLIC AND AGENCY INVOLVEMENT	5
2.1. Project Team Meetings	5
2.2. Public Information Meetings	5
2.3. Stakeholder Meetings	6
2.4. RTC Technical Advisory Committee (RTC TAC) and Citizen Multimodal Advisory Committee (CMAC)	6
2.5. Reno Access Advisory Committee (RAAC)	7
3. SELF-EVALUATION AND SUMMARY OF FINDINGS	7
3.1. Regional Roads	7
3.2. RTC Transit Stop Facilities Review	13
3.2.1. Prioritization Factors for Transit Stops	19
3.3. RTC Owned Building Facilities Review	21
3.3.1. Prioritization Factors for RTC Building Facilities	22
3.4. Programs, Procedures, and Policies Review	24
3.4.1. Departmental Surveys and Interviews	25
3.4.2. Documents, Forms, and Videos Reviewed	26
3.4.3. Contracts and Leases	26
3.4.4. RTC Wide ADA Training Program	26
3.4.5. RTC’s Boards and Programs	27
3.4.6. Website Compliance	27
3.4.7. Non-Discrimination Language for Contracts, Agreements, and Waivers	27
3.4.8. Effective Communication Efforts and Policy	27
3.4.9. Paratransit	28
4. IMPLEMENTATION	33
4.1. Facilities Cost Projection Overview	33
4.2. Implementation Schedule	34
4.3. Funding Opportunities	35
4.3.1. Federal and State Funding	35

4.3.2. Local Funding	37
4.3.3. Private Funding.....	37
5. CONCLUSION.....	38
5.1. Next Steps	38

LIST OF FIGURES

Figure 1 – 2040 Regional Transportation Plan Projects	12
Figure 2 – RTC Transit Stops.....	15
Figure 3 – 360 Transit Stops where ADA Data was Collected.....	16

LIST OF TABLES

Table 1 – Summary Public and Agency Involvement Meetings	5
Table 2 – Summary of Sidewalk Inventory from Corridors.....	13
Table 3 – Summary of Transit Stop Issues.....	18
Table 4 – Prioritization Factors for Transit Stops.....	20
Table 5 – Prioritization Summary for Transit Stops	21
Table 6 – Summary of Buildings Reviewed	21
Table 7 – Prioritization Factors for Buildings	23
Table 8 – Prioritization Summary for RTC Buildings.....	24
Table 9 – Summary Self-Evaluation Findings of Programs, Procedures, and Policies.....	29
Table 10 – Summary of RTC Facility Costs.....	33
Table 11 – 2017-2021 RTP Projects on Regional Roads with ADA Improvements and Connectivity	34
Table 12 – Implementation Schedule	34
Table 13 – Funding Opportunities	36

LIST OF APPENDICES (VOLUME 2)

Appendix A	ADA Transition Plan October 2011
Appendix B	Public and Agency Involvement
Appendix C	Facility Maps
Appendix D	Transit Stop Facility Reports
Appendix E	Building Facility Reports
Appendix F	Self-Evaluation Findings - Non-Facilities
Appendix G	Sample Documents
Appendix H	ADA Action Log

LIST OF ACRONYMS

ADA	Americans with Disabilities Act
ADAAG	Americans with Disabilities Act Accessibility Guidelines
AIDS	Acquired Immune Deficiency Syndrome
ATI	Associated Transit Improvement
BFOQ	Bona Fide Occupational Qualification
BUILD	Better Utilizing Investments to Leverage Development Transportation Discretionary Grants
CDBG	Community Development Block Grants
CFR	Code of Federal Regulations
CID	Community Improvement District
CIP	Capital Improvement Projects
CMAC	Citizen's Multimodal Advisory Committee
CMAQ	Congestion Mitigation and Air Quality Improvement Program
DOJ	United States Department of Justice
DOT	United States Department of Transportation
DME	Durable Medical Equipment
EIT	Electronic and Information Technology
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
FEMA	Federal Emergency Management Agency
HSIP	Highway Safety Improvement Program
ICP	Improvement and Connectivity Program
INFRA	Infrastructure for Rebuilding America Discretionary Grant Program
MPO	Metropolitan Planning Organization
NHPP	National Highway Performance Program
NHTSA 405	National Priority Safety Programs (Nonmotorized safety)
NUCP	Nevada Unified Certification Program
PROWAG	Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way
Services	Programs, Services, and Activities
RAAC	Reno Access Advisory Committee

ADA Transition Plan

RRIF	Regional Road Impact Fee
RTC	Regional Transportation Commission of Washoe County
RTP	Regional Transportation Plan
SPR	Statewide Planning and Research
STBG	Surface Transportation Block Grant Program
TA	Transportation Alternatives Set-Aside
TAC	Technical Advisory Committee
TAD	Tax Allocation District
TIF	Tax Increment Financing District
TIFIA	Transportation Infrastructure Finance and Innovation Act (loans)
TRZ	Transportation Reinvestment Zone
U.S.	United States
WCAG	Web Content Accessibility Guidelines

Please contact the RTC Metropolitan Planning Division at 775-348-0480 to obtain Volume 2.



1. INTRODUCTION

Achieving equity and environmental justice in the provision of transportation projects and services is an important goal of the Regional Transportation Commission of Washoe County (RTC). The RTC strives to serve the transportation needs of all residents and visitors in the planning area without discrimination based on age, income, race, language, ethnicity, or ability. The RTC complies with the federal policies and requirements listed below:

- Title VI of the Civil Rights Act of 1964: No person in the United States (U.S.) shall, on the basis of race, color, or national origin, be excluded from participation in, denied benefits of, or subjected to discrimination under any program receiving federal funding. The RTC is required to take steps to ensure that no discrimination on the basis of race occurs. Title VI requires reporting about how transit services are implemented and what measures the RTC is taking to provide equal access to public transportation.
- Americans with Disabilities Act (ADA) of 1990: Requires that disabled persons have equal access to transportation facilities. This includes wheelchair accessible accommodations in the transit system.
- Executive Order on Environmental Justice: Executive Order 12898 requires the identification and assessment of disproportionately high and adverse impacts on minority and low-income populations.

It is the RTC's priority to make travel safe and accessible for all users. This plan evaluates RTC facilities and property and identifies a path forward to improve accessibility for the traveling public. This plan builds on the 2011 ADA Transition Plan that prioritizes sidewalk needs on regional roads.

1.1. Americans with Disabilities Act

The ADA of 1990 provides comprehensive civil rights protections to qualified individuals with disabilities. The ADA prohibits discrimination in access to jobs, public accommodations, government services, public transportation, and telecommunications. A primary goal of the ADA is to ensure equal participation in public life for all Americans with disabilities. Title II of the ADA also requires that all programs, services, and activities (services) of public entities provide equal access for individuals with disabilities. This means that people with disabilities are entitled to all of the rights, privileges, advantages, and opportunities that others have when participating in civic activities. Throughout this document, programs, services, and activities will be referred to as services.

Under Title II, a public entity may not deny the benefits of its services to individuals with disabilities by maintaining inaccessible facilities, which house these services. The services of the RTC, when viewed in their entirety, must be made accessible to and usable by individuals with disabilities, except where to do so would result in a fundamental alteration in the nature of the program; result in undue financial and administrative burden or threaten or destroy the historical significance of a historic property.

Section §35.150 requires that each program, service, or activity conducted by a Title II entity, when viewed in its entirety, be readily accessible to and usable by individuals with disabilities. The regulation is clear, however, that an entity is not required to make each of its existing facilities accessible (§35.150(a)(1)), unlike Title III of the ADA, which requires public accommodations to remove architectural barriers where such removal is "readily achievable," or to provide goods and services through alternative methods, where those methods are "readily achievable." Title II

requires an entity to make its programs accessible in all cases, except where to do so would result in a fundamental alteration in the nature of the program or cause an undue financial and administrative burden. The U.S. Congress intended the "undue burden" standard in Title II to be significantly higher than the "readily achievable" standard in Title III. Thus, although Title II may not require removal of barriers in some cases where removal would be required under Title III, the program access requirement of Title II should enable individuals with disabilities to participate in and benefit from the programs, services, or activities in all but the most unusual cases.

To comply with the Title II requirements for accessibility to RTC services, this Transition Plan:

- Evaluates existing policies, procedures, and practices as they pertain to the RTC programs, services, and activities;
- Provides findings and recommendations about policies, procedures, and practices;
- Assesses the extent of architectural barriers to program accessibility with respect to transit stops and within the facilities operated by the RTC;
- Describes in detail the methods that will be used to make the facilities accessible;
- Estimates costs for barrier removal;
- Specifies the steps necessary to achieve compliance;
- Provides a schedule for barrier removal;
- Sets priorities for barrier elimination; and
- Indicates the official responsible for the implementation of the plan.

Per 28 Code of Federal Regulations (CFR), Part 35; Subpart D – Program Accessibility; §35.150 – Existing Facilities; (d) Transition Plan (1): The RTC shall provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the development of the transition plan by submitting comments. To satisfy this requirement and to gain the perspective of individuals with disabilities, a public information meeting was held on Wednesday, September 19, 2018, with another public meeting on October 24, 2019.

1.2. Section 504 of the Rehabilitation Act

Section 504 of the Rehabilitation Act of 1973 (Section 504) was the first disability civil rights law to be enacted in the United States and guarantees rights to individuals with disabilities. Section 504 prohibits discrimination against qualified individuals with disabilities in all services that receive federal financial assistance. Section 504 provides guidance for legislation on behalf of individuals with disabilities, such as the ADA of 1990.

1.3. ADA Self-Evaluation and Transition Plan Development Requirements and Process

The RTC is obligated to observe all requirements of Title I in its employment practices; Title II in its services; any parts of Titles IV and V that apply to the RTC and its programs, services, or facilities; and all requirements specified in the 2010 ADA Standards and 2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG) that apply to facilities and other physical holdings.

Title I of the Americans with Disabilities Act prohibits private employers, State and local governments, employment agencies and labor unions from discriminating against qualified individuals with disabilities in job application procedures, hiring, firing, advancement, compensation, job training, and other terms, conditions, and privileges of employment. The ADA

ADA Transition Plan

covers employers with 15 or more employees, including State and local governments. It also applies to employment agencies and to labor organizations.

Title II has the broadest impact on the RTC. Included in Title II are administrative requirements for all government entities employing more than 50 people. These administrative requirements are:

- Completion of a Self-Evaluation;
- Development of an ADA complaint procedure;
- Designation of at least one person who is responsible for overseeing Title II compliance (the ADA Coordinator); and
- Development of a Transition Plan to schedule the removal of the barriers uncovered by the Self-Evaluation process. The Transition Plan shall become a working document until all barriers have been addressed.

This document describes the process developed to complete the evaluation of the RTC's services, including six RTC-owned buildings, and 360 of more than 1,000 transit stops. After evaluation, this document provides possible solutions to remove programmatic barriers, and presents a Transition Plan for the modification of facilities and transit stops to improve accessibility. This document is intended to guide the planning and implementation of necessary program and facility modifications over the next 20 years. The ADA Self-Evaluation and Transition Plan is significant in that it establishes the RTC's ongoing commitment to the development and maintenance of services and facilities that accommodate all users. The remaining transit stop evaluations will be completed in additional project phases (approximately 650 transit stops). The RTC anticipates updating the ADA Transition Plan and transit stop evaluation every five years in coordination with the Transit Stop Improvement and Connectivity Program (ICP).

1.4. Discrimination and Accessibility

Program accessibility means that, when viewed in its entirety, each program is readily accessible to and usable by individuals with disabilities. Program accessibility is necessary not only for individuals with mobility needs, but also to individuals with sensory and cognitive disabilities.

Accessibility applies to all aspects of a program or service, including but not limited to physical access, advertisement, orientation, eligibility, participation, testing or evaluation, provision of auxiliary aids, transportation, policies, and communication.



The following are examples of elements that should be evaluated for barriers to accessibility. It is important to note that the following lists are not exhaustive.

Physical Barriers

- Parking
- Path of travel to, throughout, and between buildings and amenities
- Doors

ADA Transition Plan

- Service counters
- Restrooms
- Drinking fountains
- Public telephones
- Path of travel along sidewalk corridors within the public right-of-way
- Access to pedestrian equipment at signalized intersections

Programmatic Barriers

- Building signage
- Customer communication and interaction
- Non-compliant sidewalks or curb ramps
- Emergency notifications, alarms, and visible signals
- Participation opportunities for RTC sponsored events



1.5. RTC Approach

The purpose of the Transition Plan is to provide the framework for achieving equal access to the RTC's services within a reasonable timeframe. Accommodating persons with disabilities is essential to good customer service, ensures the quality of life residents seek to enjoy, and guides future improvements. This Transition Plan has been prepared after careful study of select RTC services, and evaluations of a number of RTC transit stop facilities.

The RTC should make reasonable modifications in services when the modifications are necessary to avoid discrimination based on disability, unless the RTC can demonstrate that making the modifications will fundamentally alter the nature of the service. The RTC will not place surcharges on individuals with disabilities to cover the cost involved in making services accessible.

1.5.1. Efforts to Date

In 2011, the RTC completed an ADA Transition Plan. The Transition Plan surveyed over 150 miles of sidewalk along regional roads in areas with a high density of government offices, schools, libraries, medical facilities, major retail centers, major employment centers, and transit stops. Prioritization was provided for the locations. This update is to build upon the 2011 Self-Evaluation and Transition Plan. A copy of the 2011 Self-Evaluation and Transition Plan is provided in **Volume 2 Appendix A**.

1.5.2. Ongoing Accessibility Improvements

To comply with the ADA, the RTC will continue to evaluate, on an ongoing basis, the services and facilities evaluated during the Self-Evaluation. The ADA Transition Plan will be revised on an ongoing basis to account for changes that have been or will be completed since the initial Self-Evaluation. An action log has also been included in **Volume 2 Appendix H** to help the RTC track

their progress with respect to implementation of the plan. The Transition Plan will be posted on the RTC's website for review and consideration by the public.

2. PUBLIC AND AGENCY INVOLVEMENT

This section describes the outreach of the project team in developing the Transition Plan to both local agencies as well the general public. Work on the Transition Plan began in July 2018 and will be completed by December 2019. **Table 1** provides a summary of the public and agency involvement meetings.

Table 1 – Summary Public and Agency Involvement Meetings

Public and Agency Meeting Number	Topics Covered
Meeting #1	Project introduction and obtain feedback on transit locations for data collection
Meeting #2	Present findings of Services Evaluation, and Facilities and Transit Evaluation
Meeting #3	Present Draft Final Transition Plan

2.1. Project Team Meetings

A Project Team was developed to help guide the project and obtain feedback from the RTC. The following departments were represented on the Project Team:

- Administrative Services
- Engineering
- Executive
- Finance
- Planning
- Public Transportation

Meetings were held throughout the project with the Project Team to gain feedback on potential locations of transit stop data collection, identify the final list of locations for transit stop data collection, obtain input on the improvement prices, receive updates on project progress, and review the Transition Plan.

2.2. Public Information Meetings

Two Public Information Meetings were held as part of the Transition Plan process.

- Wednesday, September 19, 2018
- Thursday, October 24, 2019

The first Public Information Meeting was conducted on September 19, 2018, to introduce the project, provide information on ADA Transition Plans, and gather input from attendees on locations for transit stop data collection. A copy of the presentation boards and comments received at the meeting are included in **Volume 2 Appendix B**.

The second Public Information Meeting was held on October 24, 2019, to summarize the project, present the recommendations and Draft Transition Plan, and gather any additional feedback from

[ADA Transition Plan

meeting attendees. A copy of the public meeting presentation and comments received at the meeting are included in **Volume 2 Appendix B**.

2.3. Stakeholder Meetings

Three Stakeholder Meetings were held as part of the Transition Plan process.

- Tuesday, September 11, 2018
- Tuesday, February 12, 2019
- Friday, November 1, 2019

Types of stakeholders invited to the meetings included contacts that the RTC has with local organizations that work with persons with disabilities as well as seniors who need affordable transportation options to healthcare and other community-based services, such as the Neighbor Network of Northern Nevada, Seniors in Service, Sanford Center, Washoe County Senior Services, etc.



The first Stakeholder Meeting was conducted on September 11, 2018, to introduce the project, provide information on ADA Transition Plans, and gather input from attendees on locations for transit stop data collection. A copy of the presentation and comments received at the meeting are included in **Volume 2 Appendix B**.

A second Stakeholder Meeting was held on February 12, 2019, to present the preliminary findings from the Self-Evaluation, and answer any questions. A copy of the presentation and comments received at the meeting are included in **Volume 2 Appendix B**.

A third Stakeholder Meeting was held on Friday, November 1, 2019 in conjunction with the regularly scheduled Senior Coalition meeting, to summarize the project, present the recommendations and Draft Transition Plan, and gather any additional feedback from meeting attendees. A copy of the presentation and comments received at the meeting are included in **Volume 2 Appendix B**.

2.4. RTC Technical Advisory Committee (RTC TAC) and Citizen Multimodal Advisory Committee (CMAC)

Three presentations were made at the RTC TAC and RTC CMAC Meetings as part of the Transition Plan process.

- Wednesday, September 5, 2018
- Wednesday, February 6, 2019

- Wednesday, September 4, 2019

The first presentations at the RTC TAC and RTC CMAC Meetings were conducted on September 5, 2018, to introduce the project, provide information on ADA Transition Plans, and gather input from attendees on locations for transit stop data collection. A copy of the presentation and comments received at the meeting are included in **Volume 2 Appendix B**.



A second presentation was made to the RTC TAC and RTC CMAC on February 6, 2019, to present the preliminary findings from the Self-Evaluation, and answer any questions. A copy of the presentation and comments received at the meeting are included in **Volume 2 Appendix B**.

A third presentation to the RTC TAC and RTC CMAC was held on September 4, 2019, to summarize the project, present the recommendations, and gather any additional feedback from meeting attendees. A copy of the presentation and comments received at the meeting are included in **Volume 2 Appendix B**.

2.5. Reno Access Advisory Committee (RAAC)

A presentation was made at the RAAC on September 25, 2018 to introduce the project, provide information on ADA Transition Plans, gather input from attendees on locations for transit stop data collection, and encourage attendees to participate in the planning process.

3. SELF-EVALUATION AND SUMMARY OF FINDINGS

The RTC's ADA Transition Plan reflects the results of a review of select services provided to employees and the public. The review identifies programmatic barriers to individuals with disabilities interested in accessing the services offered by the RTC.

3.1. Regional Roads

As a Metropolitan Planning Organization (MPO), the RTC does not own roads or sidewalk facilities. Roads and sidewalk facilities are under the control of the jurisdiction in which they reside (Reno, Sparks, Washoe County, or the NDOT). Although, the RTC does not own roads or sidewalk facilities, the RTC provides pavement preservation and new roadway construction projects for regional roads under the jurisdiction of Reno, Sparks, and Washoe County. The RTC works with these jurisdictions to focus on regional roadways, streets that service large numbers

ADA Transition Plan

of vehicle trips (greater than 5,000 average daily trips), transit routes, and roads that provide connectivity between jurisdictions and across major geographic barriers.

In 2011, the RTC completed an ADA Transition Plan. The Transition Plan surveyed over 150 miles of sidewalk along regional roads in areas with a high density of government offices, schools, libraries, medical facilities, major retail centers, major employment centers, and transit stops. Common findings included the following:

- Curb ramps
 - Steep curb ramps
 - Steep gutter returns
 - Missing detectable warnings
 - Absence of curb ramps
- Sidewalk obstructions
 - Vertical displacement
 - Utility poles or sign posts placed without adequate passing width
 - Overhanging tree limbs
 - Intermittent sidewalks
 - Narrow sidewalks
 - Open utility covers/holes
 - Surface deterioration
- Driveways
 - Inaccessible cross slope
- Transit Stops
 - Lack of clear floor space



Prioritization was provided for the locations. This update compliments the 2011 Self-Evaluation and Transition Plan. A copy of the 2011 Self-Evaluation and Transition Plan is provided in **Volume 2 Appendix A**.

Since the 2011 ADA Transition Plan, the RTC has implemented regional ADA improvements, including the following:

- 631 curb ramps
- 30 miles of sidewalk

Specific corridor improvements include the following projects:

- Sutro Street – 4th Street to McCarran Boulevard
- Silverada Boulevard – 9th Street to Fantastic Drive
- Moana Lane – Kietzke Lane to Neil Road
- Southeast McCarran Boulevard – Airway Drive to Greg Street
- Pyramid Way and McCarran Boulevard Intersection – on Pyramid: Richards Way to Farr Lane, on McCarran Boulevard: Rock Boulevard to 4th Street
- 4th and Prater – Evans Avenue to Pyramid Way
- Harvard Way – Linden Street to Villanova Drive

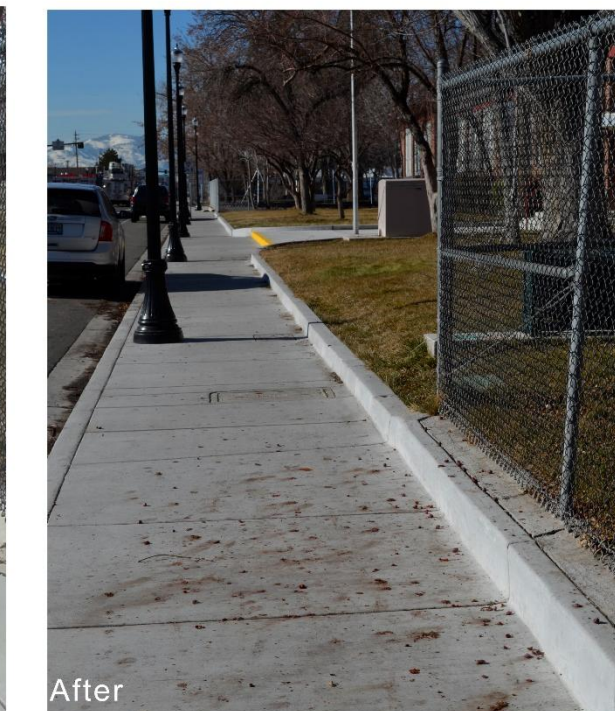
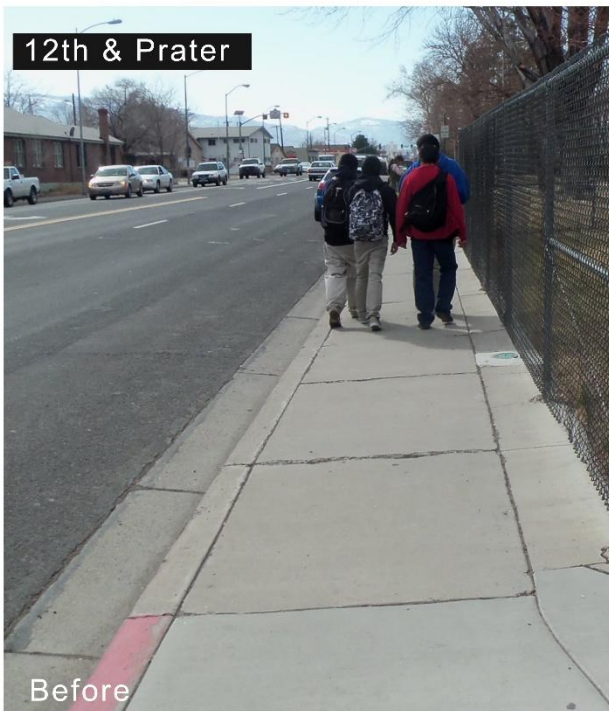
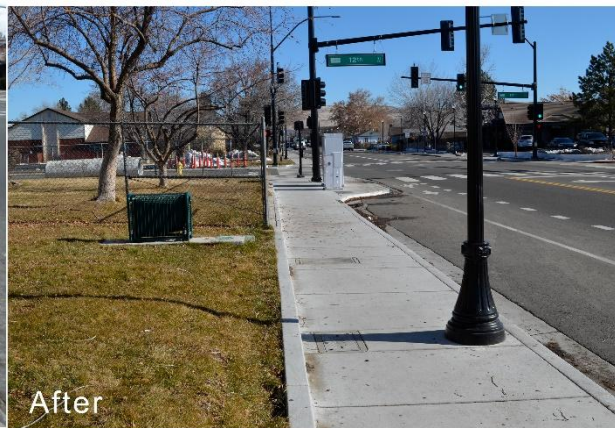
ADA Transition Plan

- Keystone Avenue and California Avenue – on California: Booth Street to Newlands Avenue, on Keystone Avenue: Foster Drive to California Avenue
- North McCarran Boulevard and North Virginia Street Intersection
- North Valleys Projects
 - Stead Boulevard/Silver Lake Road
 - Silver Lake Road east of Stead Boulevard
 - Lemmon Drive and Surge Street
 - Stead Boulevard and Ural Street

The RTC is responsible for developing a Regional Transportation Plan (RTP) which identifies the long-term investments needed in the regional road network. The RTP is the region's 20-year long range plan. The 2040 RTP was adopted on May 18, 2017 and amended in August 2018. When projects are conducted along regional roads, the RTC provides ADA improvements to transit stops, sidewalks, and curb ramps along the corridors. Following are examples of before and after photographs of the types of projects that are included in the RTP. **Figure 1** provides a summary of projects included in the 2040 RTP.



ADA Transition Plan



ADA Transition Plan



Figure 1 – 2040 Regional Transportation Plan Projects

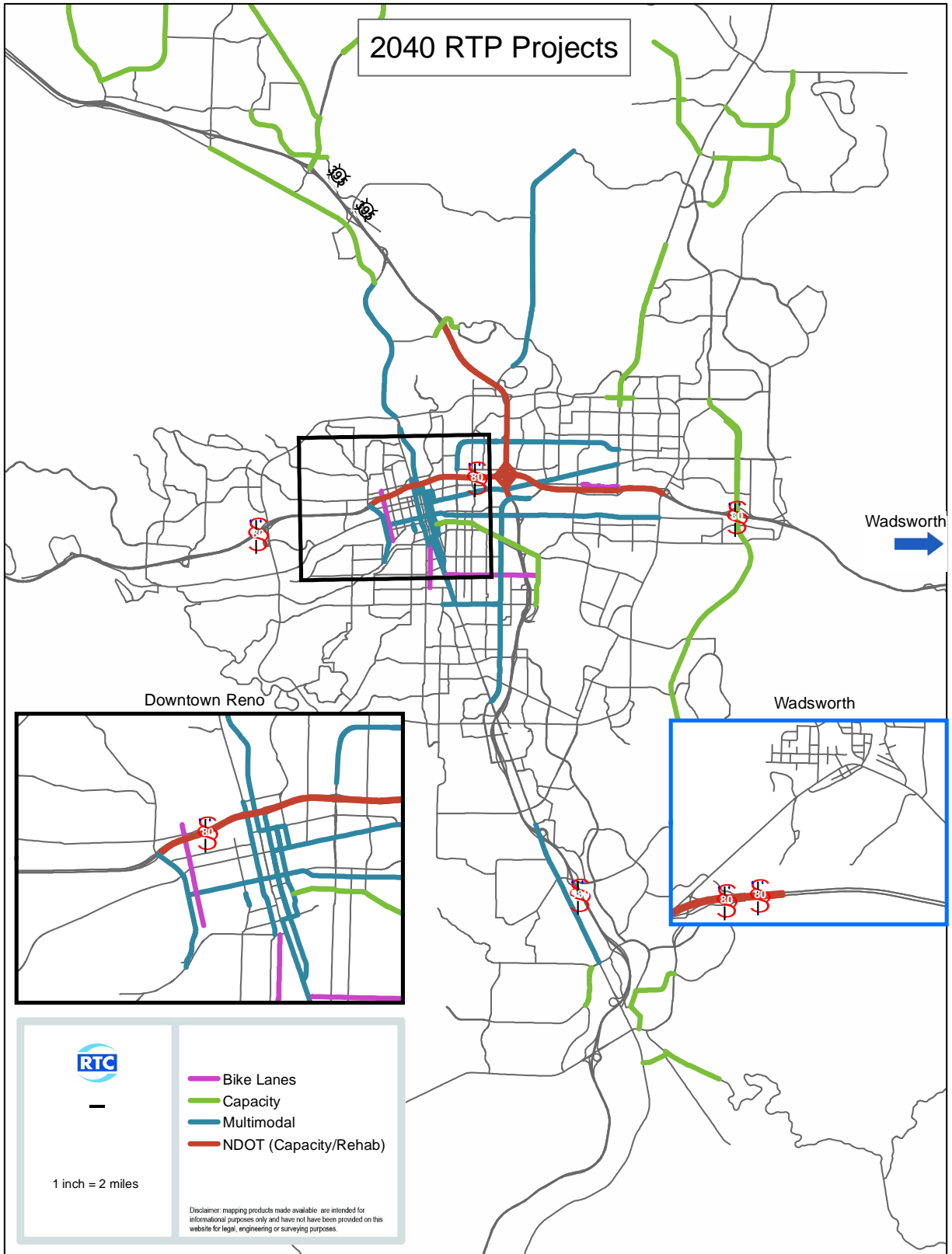


Table 2 provides a summary of the inventory from the 2011 Transition Plan along with the remaining facilities to be upgraded as of the time this document was prepared along with the facilities left to be upgraded after the RTP is completed.

Table 2 – Summary of Sidewalk Inventory from Corridors

Facility	2011 ADA Transition Plan Inventory	Remaining Facilities to be Upgraded	Remaining Facilities to be Upgraded after Implementation of the RTP
Miles of Sidewalk	159.2	140.9	100.7
Curb Ramps	2,964	2,490	1,788
Obstructions	3,265	2,749	1,996
Driveways	2,269	1,920	1,423

Note: Does not include RTC Spot Improvement Projects, which may take place on non-regional roads where transit connectivity needs are identified.

3.2. RTC Transit Stop Facilities Review

The RTC maintains over 1,000 transit stops within the region. The RTC is currently working on a Transit Stop ICP, and a project to add transit stop ADA signage and markers for visually impaired customers. As described in **Section 3.1**, the RTC also provides ADA improvements to transit stops located along roadway projects included in the RTP.

The Transit Stop ICP is a multi-year program to make ADA improvements and improve connectivity in the region. Non-compliant transit stop improvements are being prioritized based on the following factors: overall operational safety, boarding/alighting activity (particularly among seniors and persons with disabilities), available right-of-way and frequency of service. To achieve progress quickly, the RTC is focusing first on locations with minimal design constraints (drainage deficiencies, utility issues, right-of-way limitations, etc.). The goal of the program is to cost effectively improve existing transit stops and accessibility to those transit stops. The transit stop ICP includes ADA pad and access improvements at various existing active transit stops throughout the community. Approximately 150 to 180 transit stops will be improved over the next three years as part of this project.

The transit stop ADA signage project plans to install ADA-accessible information placards on the pole of every bus stop to inform riders that they can use a NextBus app to find the arrival times of the next bus. These would also act as markers to let visually impaired riders know that the poles are bus stop poles (as opposed to stop signs, no parking signs, etc.). The project is expected to enhance convenience and accessibility for transit especially for the visually impaired, and addresses a comment received during the outreach portion of the project from the National Federation of the Blind of Northern Nevada.



ADA Transition Plan

As part of the ADA Transition Plan, 360 transit stops maintained by the RTC were evaluated. The following methodology was utilized to determine locations to collect transit stop data:

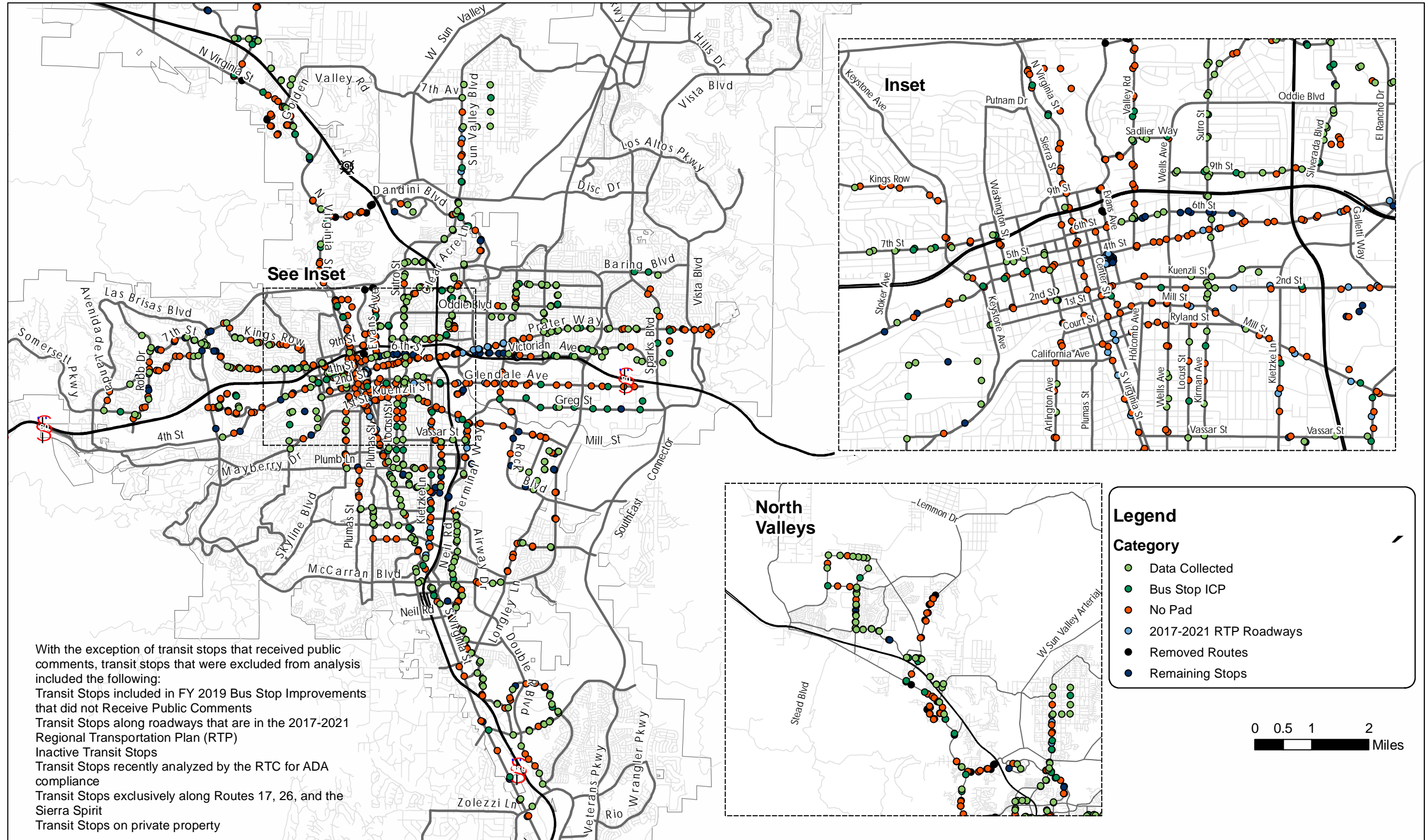
- Any transit stop that received a public comment during the public comment period was included for evaluation.
- Any transit stop that received a comment from transit operators during the public comment period was evaluated.
- Transit stops included in the preliminary Transit Stop ICP list that did not receive comments were not considered, as the RTC is planning to make improvements at these locations in the near future.
- Transit stops along roadways that are in the 2017-2021 RTP that did not receive a public comment were not considered, as upgrades will be made to these transit stops when projects are implemented.
- Transit stops recently analyzed by the RTC for ADA compliance that did not receive a public comment were not considered.
- Transit stops exclusively along Routes 17, 26, and the Sierra Spirit were not included.
- Transit stops denoted as being on private property in the RTC's database were not included.
- Transit stops that did not receive public comment and did not contain a pad were not evaluated, as there was no need to collect data at transit stops without a pad, as they are known to be non-compliant.

Additional stops will be evaluated through future updates of the ADA Transition Plan. It is anticipated that this plan will be updated every five years and will continue to provide transit stop accessibility data for use in the Transit Stop ICP.

Figure 2 illustrates all of the RTC transit stops and methodology for data collection, and **Figure 3** contains the transit stops where data was collected as part of this ADA Transition Plan.

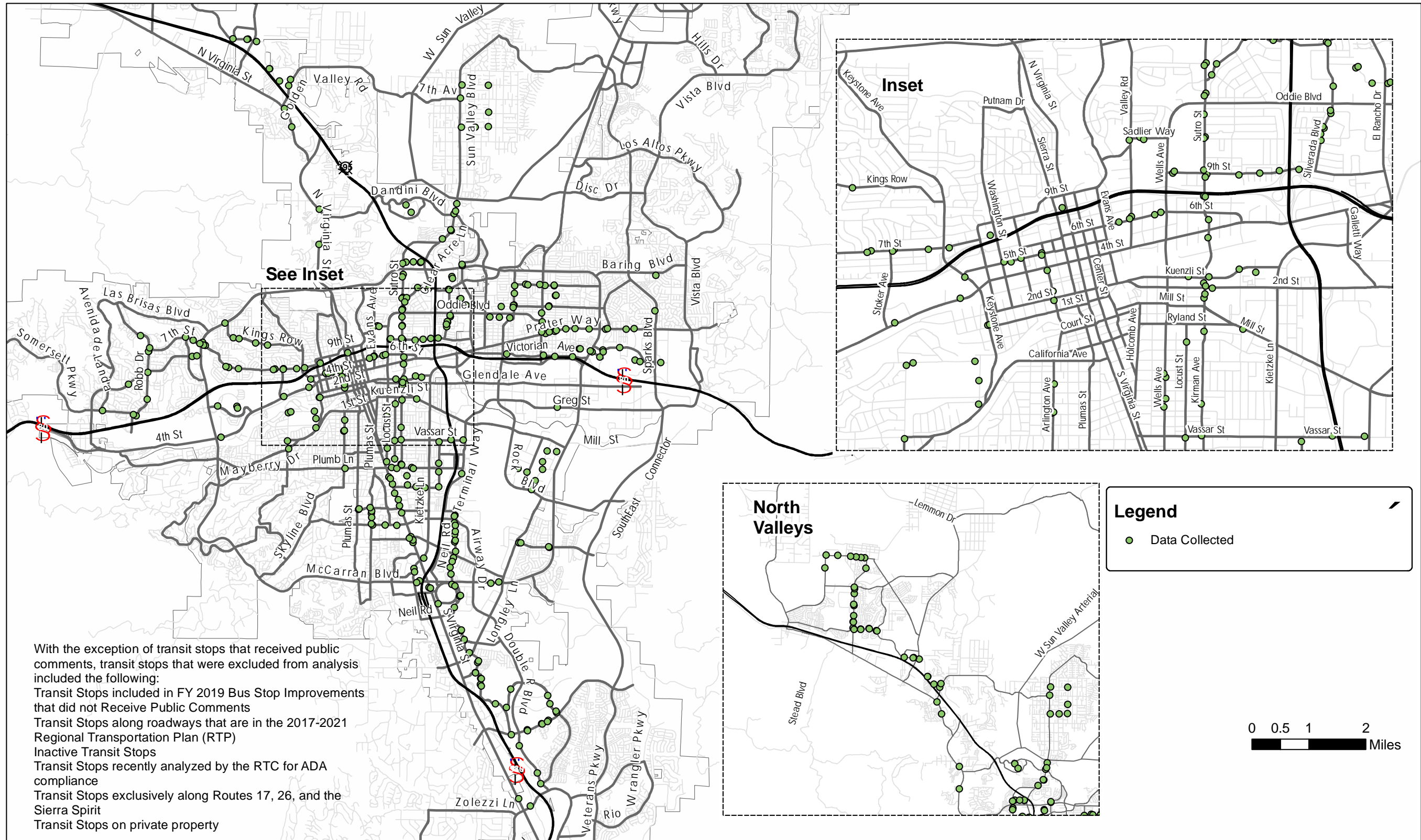


Figure 2 – RTC Transit Stops



With the exception of transit stops that received public comments, transit stops that were excluded from analysis included the following:
 Transit Stops included in FY 2019 Bus Stop Improvements that did not Receive Public Comments
 Transit Stops along roadways that are in the 2017-2021 Regional Transportation Plan (RTP)
 Inactive Transit Stops
 Transit Stops recently analyzed by the RTC for ADA compliance
 Transit Stops exclusively along Routes 17, 26, and the Sierra Spirit
 Transit Stops on private property

Figure 3 – 360 Transit Stops where ADA Data was Collected



Transit stop evaluations at the 360 locations included documentation of the conditions and measurements within the boarding areas, the adjacent sidewalk network, the transit stop sidewalk areas, and any transit stop amenities.

The RTC must have accessible services, including transit services. Service accessibility means that, when viewed in its entirety, each service is readily accessible to and usable by individuals with disabilities. In addition to physical barriers at each transit stop, access to each transit stop was also documented. Specifically, the presence of sidewalks connecting the transit stop boarding and alighting area to the nearest public right-of-way sidewalk or nearest cross street.

Transit Stop Signage: Self-Evaluation Findings

Transit stop signage was evaluated per PROWAG Section R410 Visual Characters on Signs. A computer-aided design and drafting file of the sign template was not available, so measurements were taken using the sign Portable Document Format files provided by the RTC. These measurements were assumed to be representative of all transit stop signage.

A few notable items affecting the transit stop signage include:

- “RIDE” transit stop signage text character height is generally too small for the height at which the signs are mounted (7 feet).
- “NextBus” sign text character is generally too small for the height at which the signs are mounted.
- Mounting transit stop signage at a lower height impacts the character height ADA requirement thresholds and should be considered as an alternative solution to printing signs with increased character text heights. If mounting heights are to be adjusted for signs within pedestrian circulation paths, requirements for post-mounted objects must be maintained per PROWAG Section R402 Protruding objects.

Transit Stop Signage: Possible Solutions

- The RTC should update the transit stop sign template so that all text meets the guidelines in PROWAG Section R410 Visual Characters on Signs.
- The transit stop ADA signage project plans to install ADA-accessible information placards on the pole of every bus stop to inform riders that they can use a NextBus app to find the arrival times of the next bus. These would also act as markers to let visually impaired riders know that the poles are bus stop poles (as opposed to stop signs, no parking signs, etc.). The project is expected to enhance convenience and accessibility for transit especially for the visually impaired, and addresses a comment received during the outreach portion of the project from the National Federation of the Blind of Northern Nevada

Transit Stop: Self-Evaluation Findings

Common transit stop issues included non-compliant transit stop signage, no flush transitions at connections with the boarding area, boarding areas with insufficient lengths, and excessive boarding area and shelter clear space running slopes. A summary of the transit stop issues identified during the self-evaluation are located in **Table 3**.

Table 3 – Summary of Transit Stop Issues

Transit Stop Element	Number Evaluated *	Number Compliant	Percent Compliant
Boarding Area			
Transition at connection to the curb is ≤ 0.25 "	353	131	37%
Boarding area length is ≥ 96 "	353	161	46%
Boarding area running slope is $\leq 2\%$	353	201	57%
No heaving/sinking/cracking present in the boarding area	353	287	81%
Boarding area cross slope is $\leq 2\%$. Where adjacent street grade is at least 2.0%, boarding area cross slope is \leq adjacent street grade	353	308	87%
Boarding area width is ≥ 60 "	353	345	98%
Boarding area has a paved connection to the street and adjacent sidewalk network	353	347	98%
No temporary obstructions (>0.25 ") in boarding area	353	348	99%
No ponding present in the boarding area	353	348	99%
No permanent obstructions (>0.25 ") in boarding area	353	351	99%
Transit Stop Sidewalk			
Transit stop signage is compliant	357	0	0%
Stand-alone bench clear space running slope is $\leq 2\%$	205	131	64%
Shelter clear space width is ≥ 30 "	68	50	74%
Stand-alone bench clear space cross slope is $\leq 2\%$. Where adjacent street grade is at least 2.0%, bench clear space cross slope is \leq adjacent street grade	205	170	83%
Shelter clear space running slope is $\leq 2\%$	68	59	87%
Shelter clear space cross slope is $\leq 2\%$ and greater than grade of adjacent roadway	68	61	90%
Stand-alone bench clear space width is ≥ 30 "	205	195	95%
Shelter clear space length is ≥ 48 "	68	65	96%
Stand-alone bench clear space length is ≥ 48 "	205	196	96%
Clear space is present under shelter	70	68	97%
Clear space is present adjacent to stand-alone bench	210	205	98%
Transit stop signage is present	360	357	99%
Shelter opening clear width is ≥ 32 "	70	70	100%

* Note: 360 total transit stops have been evaluated to date. Certain elements did not exist at various transit stops, and the total number evaluated in the table above represents the number of instances where the element exists. For example, there were only 353 evaluated transit stops that had a paved boarding area and only 68 evaluated transit stops that had a shelter.

The following locations that were evaluated did not have access provided to the transit stop boarding and alighting area from the nearest public right-of-way sidewalk or nearest cross

ADA Transition Plan

street. However, there is not a one size fits all solution on how to best provide access to the transit service and each location should be reviewed independently by the RTC.

- West side of Lupin Dr north of 6th Ave (Transit Stop ID 252)
- North side of Merchant St east of Sullivan Ln (Transit Stop ID 1614)
- North side of Sharlands Ave west of Robb Dr (Transit Stop ID 1674)
- East side of North Hills Blvd north of Beckwourth Dr (Transit Stop ID 1987)

Transit Stop: Possible Solutions

- A list of possible solutions can be found in the transit stop reports provided in **Volume 2 Appendix D**.

3.2.1. Prioritization Factors for Transit Stops

Transit stops were prioritized on a 5-point scale, which is defined in **Table 4**. This prioritization methodology was developed to aid in determining which transit stops should be prioritized for improvements over other transit stops based on the severity of non-compliance with ADA.



Table 4 – Prioritization Factors for Transit Stops

Priority	Criteria
1 (high)	<ul style="list-style-type: none"> ▪ No connection from transit stop to adjacent sidewalk ▪ Transitions at connections between the boarding area, transit stop sidewalk, and/or sidewalk network is greater than 0.25" ▪ Heaving/sinking/cracking in the boarding area, transit stop sidewalk, or sidewalk network that connects to the transit stop with level changes greater than 0.25", or gaps over 0.5" ▪ Boarding area does not exist
2 (high)	<ul style="list-style-type: none"> ▪ Boarding area length less than 48" ▪ Boarding area width less than 36" ▪ Boarding area running slope exceeds 5% ▪ Permanent obstruction (>0.25") in boarding area, transit stop sidewalk, or sidewalk network ▪ Transition at connection to the curb is greater than 0.25" ▪ Clear space width under shelter or adjacent to a stand-alone bench is less than 30"
3 (medium)	<ul style="list-style-type: none"> ▪ Sidewalk network or transit stop sidewalk cross slope is over 3.5% ▪ No clear space adjacent to bench under shelter ▪ Clear space cross slope under shelter or adjacent to a stand-alone bench is greater than 3.5% ▪ Clear space running slope under shelter or adjacent to a stand-alone bench is greater than 3.5%; Clear space length under shelter or adjacent to a stand-alone bench is less than 42" ▪ Shelter opening clear width is less than 30"
4 (medium)	<ul style="list-style-type: none"> ▪ Boarding area length is 48" – 76.9" ▪ Boarding area width is 36" – 47.9" ▪ Boarding area running slope is 3.1% - 5% ▪ Ponding in the boarding area, transit stop sidewalk, or sidewalk network ▪ Temporary obstruction (>0.25") in boarding area, transit stop sidewalk, or sidewalk network ▪ Sidewalk network connecting to the transit stop is 46.1" – 47.9" wide ▪ Sidewalk network cross slope is between 2.1% to 3.5% ▪ No transit stop signage ▪ Non-compliant transit stop signage ▪ No clear space adjacent to stand-alone bench ▪ Clear space cross slope under shelter or adjacent to a stand-alone bench is 2.1% - 3.5% ▪ Clear space running slope under shelter or adjacent to a stand-alone bench is 2.1% - 3.5% ▪ Clear space length under shelter or adjacent to a stand-alone bench is 42" – 45.9" ▪ Shelter opening clear width is between 30" and 32"
5 (low)	<ul style="list-style-type: none"> ▪ Boarding area length is 72" - 95.9" ▪ Boarding area width is 48" - 59.9" ▪ Boarding area running slope is 2.1% - 4.9% ▪ Clear space length under shelter or adjacent to a stand-alone bench is 46" – 47.9"

Table 5 provides summaries of the prioritization classifications for transit stops. It is important to note that 360 transit stops were evaluated as part of this plan, and there are other transit stops that were not evaluated. Of those not evaluated, it is known that 418 do not have pads, and the condition of the remaining 274 transit stops is unknown. These will be evaluated in future ADA Transition Plan updates.

Table 5 – Prioritization Summary for Transit Stops

Priority	Number of Transit Stops Evaluated
0 (compliant)	0
1 (high)	76
2 (high)	189
3 (medium)	12
4 (medium)	83
5 (low)	0
Unknown	
Total	360

3.3. RTC Owned Building Facilities Review

Six (6) buildings were evaluated. All buildings included in the evaluation are listed in **Table 6**.

Table 6 – Summary of Buildings Reviewed

Buildings	
RIDE Maintenance Facility	2050 Villanova
Administrative Offices	1105 Terminal Way
ACCESS Maintenance Facility	600 Sutro Street
Centennial Plaza	1421 Victorian Avenue
4 th Street Station	200 E. 4 th Street
6 th Street Bus Storage Yard	1301 E. 6 th Street

Buildings: Self-Evaluation Findings

Areas that were evaluated for each building included parking lots, path of travel from the parking lot to the building, access into the building, signage, drinking fountains, telephones, bathrooms, and counter heights. A complete list of findings are provided in the building facility reports (see **Volume 2 Appendix E**). Common issues identified at the RTC facilities included:

- Non-compliant accessible parking
- Non-compliant exterior accessible routes
- Non-compliant transaction counters
- Non-compliant restrooms and drinking fountains

Buildings: Possible Solutions

- A complete list of possible solutions is provided in the building facility reports (see **Volume 2 Appendix E**).

3.3.1. Prioritization Factors for RTC Building Facilities

Buildings were prioritized on a 12-point scale, which is defined in **Table 7**. This prioritization methodology was developed by the Consultant Team to aid the RTC in determining how the buildings should be prioritized for improvements based on the severity of non-compliance with ADA. **Table 8** provides summaries of the prioritization classifications for RTC building facilities. As shown in **Table 8**, the most severe issues are a higher priority along with access to the building from the exterior.

Table 7 – Prioritization Factors for Buildings

Priority	Criteria
1 (high)	Complaint known or imminent danger present
2 (high)	<ul style="list-style-type: none"> ▪ Element is more than twice the allowable requirement. No known complaint. ▪ AND (for exterior conditions) location is near a hospital, school, transit stop, government building, or other pedestrian attractor.
3 (high)	<ul style="list-style-type: none"> ▪ Element is more than twice the allowable requirement. No known complaint. ▪ AND (for exterior conditions) location is not near a hospital, school, transit stop, government building, or other pedestrian attractor.
4 (high)	Issues with parking or exterior conditions Department of Justice (DOJ) level 1) – moderately out of compliance
5 (medium)	Issues with access to goods and services (DOJ level 2) – severely out of compliance
6 (medium)	Issues with: <ul style="list-style-type: none"> ▪ Access to goods and services (DOJ level 2) – moderately out of compliance; ▪ Parking or exterior conditions (DOJ level 1) – minimally out of compliance; OR ▪ Restrooms (DOJ level 3) – severely out of compliance
7 (medium)	Issues with: <ul style="list-style-type: none"> ▪ Access to goods and services (DOJ level 2) – minimally out of compliance; ▪ Restrooms (DOJ level 3) – moderately out of compliance; OR ▪ Drinking fountains or public phones (DOJ level 4 and 5) – severely out of compliance
8 (medium)	Issues with drinking fountains or public phones (DOJ level 4 and 5) - moderately out of compliance
9 (low)	Issues with restrooms (DOJ level 3) – minimally out of compliance
10 (low)	Issues with drinking fountains or public phones (DOJ level 4 and 5) - minimally out of compliance
11 (low)	<ul style="list-style-type: none"> ▪ Client is a Title II agency; AND ▪ Elements out of compliance, but may be able to be handled programmatically or do not need to be handled unless or until the agency hires a person with a disability
12 (low)	Element is fully compliant with an older standard (safe-harbored), but will need to be brought into compliance with current standards if altered

Table 8 – Prioritization Summary for RTC Buildings

Priority	Number of Barriers by Facility					
	RIDE Maintenance Facility	Admin Office	ACCESS Maintenance Facility	Centennial Plaza	4th Street Station	6th Street Bus Storage Yard
1 (high)	0	0	0	0	0	0
2 (high)	3	1	11	0	0	0
3 (high)	0	0	0	0	0	0
4 (high)	7	0	1	0	0	0
5 (medium)	1	37	8	0	1	0
6 (medium)	6	21	10	12	1	0
7 (medium)	1	13	9	0	6	0
8 (medium)	0	0	0	0	0	0
9 (low)	0	19	15	6	14	0
10 (low)	0	1	1	3	1	0
11 (low)	66	14	76	32	26	3
12 (low)	0	0	0	0	0	0
Total	84	106	131	53	49	3

3.4. Programs, Procedures, and Policies Review

Under the ADA, the RTC is required to complete a Self-Evaluation of the RTC’s facilities, programs, policies, and practices. A full review is provided in **Volume 2 Appendix F** along with sample documents provided in **Volume 2 Appendix G**.

In addition to identifying and modifying physical barriers, Title 28 CFR Part 35, *Non-Discrimination on the Basis of Disability in State and Local Government Services*, requires that a public entity evaluate its policies, procedures, and practices. The Self-Evaluation identifies and provides possible solutions to those policies and practices that are inconsistent with Title II requirements. To be compliant, the Self-Evaluation should consider all the RTC’s services, as well as the policies and practices the RTC uses to implement its various programs and services.

It is recommended that the RTC periodically evaluate such policies, procedures, and practices pertaining to communication, auxiliary aides and services, emergency response, publications, determination for undue burden, public activities, employment, and new construction of facilities, in addition to physical accessibility to RTC facilities.

To comply with requirements of the plan, the RTC must take corrective measures to address issues identified in the assessment to achieve program accessibility through several methods, including, but not limited to:

- Relocation of programs to accessible facilities;

- Modifications to existing programs so they are offered in an accessible manner;
- Structural methods such as altering an existing facility;
- Policy modifications to ensure nondiscrimination; and
- Auxiliary aids provided to produce effective communication.

When choosing a method of providing program access, the RTC should attempt to give priority to the method that promotes inclusion among all users, including individuals with disabilities.

Services offered by the RTC to the public must be accessible. Accessibility applies to all aspects of a service, including advertisement, orientation, eligibility, participation, testing or evaluation, physical access, provision of auxiliary aids, transportation, policies, and communication.

However, the RTC does not have to take any action that will result in a fundamental alteration in the nature of a program or activity, create a hazardous condition for other individuals, or result in an undue financial and/or administrative burden. This determination can only be made by the ADA/504 Coordinator and/or an authorized designee of the RTC, such as the RTC Director or his designee, and must be accompanied by a written statement detailing the reasons for reaching the determination.

The determination of undue burden must be based on an evaluation of all resources available for use. If a barrier removal action is judged unduly burdensome, the RTC must consider all other options for providing access that will ensure that individuals with disabilities receive the benefits and services of the program or activity. This process must be fully documented, and it is recommended that it be stored with all ADA related documentation.

3.4.1. Departmental Surveys and Interviews

The interactive survey process was conducted following the review of the RTC's website. The services questionnaires were submitted to each RTC department. The questionnaires were tailored to the services offered by each department and used to finalize the determination of ADA compliance for each department's services. The responses were reviewed, and possible solutions for issues identified have been integrated throughout the ADA Transition Plan. The following RTC departments were surveyed.

- Administrative Services
- Engineering and Construction
- Executive
- Finance
- Metropolitan Planning
- Public Transportation and Operations

All applicable ADA policies and practices provided by the RTC and located on the RTC website were evaluated. No RTC department was found to intentionally discriminate when conducting services.

The ADA Transition Plan document also provides guidance on each service offered by the RTC, including information on:

- Reasonable accommodation policies and procedures;
- Reasonable modification policies and procedures;
- Service animal guidance for reasonable accommodations;
- Service animal guidance for reasonable modifications in public places;

ADA Transition Plan

- ADA grievance procedure for Section 508 and grievance form;
- ADA appeals process for Section 508;
- Retaliation or Coercion Policy;
- Non-discrimination Statement Policy;
- Non-discrimination Clause Policy;
- Public notice requirements under the ADA;
- Title II ADA/504 ADA assurance requirements;
- Alternate format policy and procedure;
- Responsibility/Acceptance Policy for Other Entities' Links, Forms, Documents and Videos;
- Sub-recipient monitoring requirements under the ADA.

Each of the topics listed above are addressed in the Transition Plan document. The RTC is dedicated to the full implementation of the plan. Staff training and coordination will be implemented to ensure each department has the tools to implement the overall plan.

The RTC has established an ADA Liaison Committee comprised of representatives involved in the development of the Transition Plan. These individuals will work closely with the ADA/504 Coordinator to resolve issues regarding the needs of their departments and the programs under their management. The RTC's ADA/504 Coordinator will work closely with the ADA Liaison Committee to coordinate the implementation of plans, programs, policies, and procedures. It is recommended that this become a permanent group which meets regularly until all facets of the ADA Transition Plan are realized.

3.4.2. Documents, Forms, and Videos Reviewed

To best understand the current status of the RTC's programs, services, and activities the Consultant Team reviewed and made specific recommendations on each document, forms, and videos that were either provided by the RTC or found on the RTC website.

Through this evaluation, it was determined several key policies that ensure ADA compliance were missing, such as a policy on requesting alternate formats and a policy on placing responsibility and acceptance for ADA Compliance regarding another entity's link, forms or videos on the RTC website. In reviewing documents provided and the RTC website, several versions of a non-discrimination statement were discovered, and it is recommended that one RTC-wide statement is developed and used consistently.

3.4.3. Contracts and Leases

As part of an ADA Transition Plan all public entities must ensure that no qualified individuals with disabilities shall be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program, service, or activity administered by that entity. In doing so, public entities should provide a statement in contracts with the RTC to ensure non-discrimination for both parties and clarify accessibility obligations.

3.4.4. RTC Wide ADA Training Program

The review process uncovered some departments attend training on ADA requirements. However, it is recommended that the RTC develop an RTC-wide ADA training program for RTC employees. Other specific training should be provided for each department that directly or indirectly interacts with the RTC citizens.

3.4.5. RTC's Boards and Programs

The RTC website provides various information regarding the RTC's boards, commissions, committees, and councils. These groups are listed below:

- RTC Board
- RTC TAC
- RTC CMAC
- Regional Road Impact Fee Technical Advisory Committee (RRIF TAC)
- Nevada Unified Certification Program (NUCP) Committee
- RTC Investment Committee

3.4.6. Website Compliance

Section 504 of the Rehabilitation Act of 1973 requires that no qualified individual with a disability, on the basis of a disability, be excluded from participation in or be denied the benefits of any service that is federally funded. The DOJ considers the RTC's website to be a program or service that is offered to the public. Therefore, the website program or service must be in ADA compliance with web accessibility guidelines.

3.4.7. Non-Discrimination Language for Contracts, Agreements, and Waivers

All public entities must ensure that no qualified individual with disabilities be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any service administered by that entity. In doing so, public entities should provide a statement in all agreements and contracts with the RTC to ensure non-discrimination for both parties and to clarify accessibility obligations.

3.4.8. Effective Communication Efforts and Policy

The ADA requires that all Title II entities communicate effectively with people who have communication disabilities by providing auxiliary aids and services. The goal is to ensure that communication with individuals with disabilities is equally effective as communication with people without disabilities.

Auxiliary aids and services are ways to communicate with individuals with disabilities. The type of auxiliary aids and services are assessed on a case-by-case basis. Auxiliary aids and services must be provided free of charge and provided in accessible formats, in a timely manner, and must be provided in a way that ensures individual privacy and independence. Examples of auxiliary aids and services include, but are not limited to:

- Sign Language Interpreters
- Written materials
- Closed Captioning
- Real-time captioning
- Audio recordings
- Materials and displays in Braille
- Large print materials
- Accessible Electronic and Information Technology (EIT)
- Assistive listening devices and systems

3.4.9. Paratransit

The Department of Justice (DOJ) Americans with Disabilities Act (ADA) regulations apply to both public and private operators of transportation service to the general public. If the private entity is providing service under a contract or other arrangement with a public entity, the private entity “stands in the shoes” of the public entity under 49 C.F.R. Section 37.23 and is subject to the requirements applicable to the public entity. While a public entity may hire contractors, it may not “contract away” its ADA responsibilities.

Table 9 provides a summary of the self-evaluation findings of the RTC's facilities, programs, policies, and practices. Additional details are provided in **Volume 2 Appendix F**.

Table 9 – Summary Self-Evaluation Findings of Programs, Procedures, and Policies

Accessibility Item	ADA Required	Recommended Best Practice	Existing Condition	Compliance Actions			Reference Link
				Needs Improvement	Needs to Be Developed	Should be Developed	
ADA/504 Coordinator's Information (Title I)		X	Exists				
ADA/504 Coordinator's Information (Title II)	X		Exists				https://www.ada.gov/pcatoolkit/c hap2toolkit.htm
Roles and Responsibilities of the ADA/504 Coordinator		X	Does not exist - Consultant drafted			X	https://www.ada.gov/pcatoolkit/c hap2toolkit.htm
ADA Liaison Committee		X	Does not exist			X	
ADA Grievance Policy, Procedure, and Form with Appeals Process (Title I)	X		Does not exist		X		https://www.ada.gov/ada_title_I.htm
ADA Grievance Policy, Procedure, and Form with Appeals Process (Title II)	X		Generally compliant but needs minor adjustments	X			https://www.ada.gov/pcatoolkit/c hap2toolkit.htm
Reasonable Accommodation Request Policy, Procedure, and Form	X		Generally compliant but needs minor adjustments	X			https://www.eeoc.gov/policy/docs/accommodation.html
Service Animal Guidance for Reasonable Accommodations		X	Exists but needs minor adjustments	X			https://www.ada.gov/service_animals_2010.htm
Service Animal Guidance for Reasonable Modifications	X		No guidance exists		X		https://www.ada.gov/service_animals_2010.htm
Reasonable Modification Request Policy, Procedure, and Form	X		Compliant but needs minor adjustments	X			https://www.ada.gov/regs2010/titleII_2010/title_ii_primer.html#policies

ADA Transition Plan

Accessibility Item	ADA Required	Recommended Best Practice	Existing Condition	Compliance Actions			Reference Link
				Needs Improvement	Needs to Be Developed	Should be Developed	
ADA Grievance Policy, Procedure, and Form with Appeal Process for Section 508 of the Rehabilitation Act		X	No policy and procedure exists			X	https://www.access-board.gov/guidelines-and-standards/communications-and-it/518-questions-answers-about-section-508-of-the-rehabilitation-act-amendments-of-1998
Retaliation or Coercion Policy		X	Exists				https://www.eeoc.gov/laws/guidance/retaliation-guidance.cfm
Non-Discrimination Language for non-Federal Contracts, Agreements, and Waivers		X	Language in contract does not exist			X	https://www.ecfr.gov/cgi-bin/text-idx?SID=a7d72f6d3eac802b0638f495f5e96ccc&mc=true&node=se49.1.27_19&rqn=div8
Non-Discrimination Contract Clause	X		Does not exist		X		https://www.ecfr.gov/cgi-bin/text-idx?SID=a7d72f6d3eac802b0638f495f5e96ccc&mc=true&node=se49.1.27_19&rqn=div9
Non-Discrimination Statement Policy The following ADA Non-Discrimination Statement Policy should contain the entity's non-discrimination statement and policy for implementation for information that is distributed from the entity.		X	Found several types of statements but none are consistent RTC-wide and does not have all language that is recommended.			X	https://www.ada.gov/regs2010/titleII_2010/titleII_2010_regulations.htm#a35106
Title II/504 ADA Assurance	X		ADA Assurances do not exist		X		https://www.ecfr.gov/cgi-bin/text-idx?SID=3ce6e4f9aea8f1ee8c2be58cf9c67a8f&mc=true&node=se49.1.27_19&rqn=div8

ADA Transition Plan

Accessibility Item	ADA Required	Recommended Best Practice	Existing Condition	Compliance Actions			Reference Link
				Needs Improvement	Needs to Be Developed	Should be Developed	
Responsibility / Acceptance Disclaimer for other Entities' Links, Forms, Documents and Videos		X	No disclaimer exists			X	
Public Notice Under the Americans with Disabilities Act	X		Public Notice does not exist		X		https://www.ada.gov/pcatoolkit/c/hap2toolkit.htm
Alternate Format Policy, Procedure, and Request Form		X	No alternate format policy and procedure exists			X	https://www.ada.gov/pcatoolkit/c/hap3toolkit.htm
Effective Communications efforts and policies	X		No guidance or policy and procedure exists		X		https://www.ada.gov/pcatoolkit/c/hap3toolkit.htm
Policies and Procedures for Purchasing		X	Does not exist			X	
Policies and Procedures for ADA Transition Plan Updates and Corrections (Title I)		X	No guidance or policy and procedure exists			X	
Employment Practices Review	X				X		https://www.eeoc.gov/laws/practices/index.cfm
Job Descriptions Review		X				X	https://www.eeoc.gov/eeoc/foia/letters/2005/titlevii_ada_job_requirements_descriptions.html
Emergency Management Plan Review (Employee Evacuation Plan and Emergency Operations Plan)	X		Exists but needs minor adjustments	X			https://www.ada.gov/pcatoolkit/c/hap7emergencymgmt.htm
Previous ADA Complaints Review (Title I and Title II) within the last 5 years		X	X				

[ADA Transition Plan

Accessibility Item	ADA Required	Recommended Best Practice	Existing Condition	Compliance Actions			Reference Link
				Needs Improvement	Needs to Be Developed	Should be Developed	
Boards, Commissions, Committees, and Councils Review	X		Review needed by RTC	X			https://www.ada.gov/ada_title_II.htm
Documents, Forms, and Videos Review	X		Review needed by RTC	X			https://www.ada.gov/ada_title_II.htm
Employee Training		X	Does not exist			X	-
Facility Compliant Checklists		X	Does not exist			X	https://www.adachecklist.org/
Proposed Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG) Adoption Memorandum		X	Does not exist			X	http://www.access-board.gov/prowac/guide/prowguide.htm

4. IMPLEMENTATION

4.1. Facilities Cost Projection Overview

To identify funding sources and develop a reasonable implementation schedule, cost projection summaries for the facilities evaluated were developed for each facility type. To develop these summaries, Consultant Team experience with similar types of projects along with input from the RTC, were the basis for the unit prices used to calculate the improvement costs. A contingency percentage (20%) was added to the subtotal to account for increases in unit prices in the future, in addition to an engineering design percentage (15%). All costs are in 2019 dollars. **Table 10** provides a summary of the estimated costs to bring each facility into compliance, not including right-of-way costs.

Table 10 – Summary of RTC Facility Costs

RTC Facilities Inventoried in 2019				
Facility Type	Priority			
	High	Medium	Low	Total
Buildings	\$39,623	\$266,361	\$218,869	\$484,853
Transit Stops Evaluated (360) *	\$1,104,600	\$93,200	\$0	\$1,197,800
Transit Stops not Evaluated (Signs Only) (692) **	\$0	\$276,800	\$0	\$276,800
Subtotal	\$1,144,223	\$636,361	\$218,869	\$1,959,453
All Remaining RTC Facilities				
Facility Type	Priority			
	High	Medium	Low	Total
Transit Stops without Pads (418) ***	\$4,180,000	\$0	\$0	\$4,180,000
Transit Stop Improvements and Connectivity Program (ICP) (150-180)	~\$3,000,000	\$0	\$0	\$3,000,000
Remaining Transit Stops (34 – 64) ****	\$0	\$0	\$640,000	\$640,000
Subtotal	\$7,180,000	\$0	\$640,000	\$7,820,000
Total	\$8,324,223	\$636,361	\$858,869	\$9,779,453

*Note: Costs are for 360 transit stops that were evaluated as part of this Transition Plan.

**Note: Costs are for signs only at 692 transit stops. (692 transit stops at \$400 per sign.)

***Note: Per meetings with the RTC the cost of pads was determined to be \$10,000. Does not include right-of-way or sidewalk connectivity costs.

****Note: Assumes 64 transit stops at \$10,000. Does not include right-of-way or sidewalk connectivity costs.

The RTC has planned projects within the 2017-2021 RTP. As part of these projects, transit stops, sidewalks, and curb ramps will be improved. Approximately 60 transit stops are located along the 2017-2021 RTP roadway network. **Table 11** contains a summary of the ADA improvements and connectivity anticipated as part of the 2017-2021 RTP.

Table 11 – 2017-2021 RTP Projects on Regional Roads with ADA Improvements and Connectivity

	Total Project Costs	ADA Improvements and Connectivity
2017 – 2021 Regional Transportation Projects (RTP)	\$871,900,000	\$43,595,000

4.2. Implementation Schedule

Table 12 details the barrier removal costs and proposed implementation schedule by facility type for the RTC-owned facilities evaluated. This 20-year plan will serve as the implementation schedule for the Transition Plan. The RTC reserves the right to change the barrier removal priorities on an ongoing basis to allow flexibility in accommodating community requests, petitions for reasonable modifications from persons with disabilities, and changes in RTC programs.

The RTC has identified \$1 million annually towards ADA accessibility improvements for the period of 2017-2021 system-wide based on the Transition Plan. In addition, the RTC Board allocated approximately \$1 million annually for the next three years for the Transit Stop ICP to bring existing transit stops to meet ADA and provide connectivity to transit stops.

It is the intent of the RTC to have its ADA Coordinator work together with department heads and budget staff to determine the funding sources for barrier removal projects. Once funding is identified, the ADA Coordinator will facilitate the placement of the projects in the Capital Improvement Program (CIP) to be addressed on a fiscal year basis.

Table 12 – Implementation Schedule

Facility Type	Estimated Cost	Implementation Schedule (years)	Approximate Annual Budget
Buildings	\$484,853	0 - 10	\$48,485
Transit Stops Evaluated as Part of this Project *	\$1,197,800	0 - 10	\$119,780
Transit Stops not Evaluated (Signs Only) **	\$276,800	0 - 10	\$27,680
Transit Stops without Pads (418) ***	\$4,180,000	0 - 10	\$418,000
Transit Stop Improvements and Connectivity Program (ICP)	~\$3,000,000	0 - 10	\$300,000
RTC Total (year 1 – 10)	\$9,139,453		
Total Annual Budget (Year 1 – 10)			\$913,945
Remaining Transit Stops****	\$640,000	10 - 20	\$64,000
RTC Total (Year 11 – 20)	\$640,000		
Total Annual Budget (Year 10 – 20) Excluding Sidewalk and Connectivity Improvements – Prices to be Determined in Future Phases			\$64,000

*Note: Costs are for 360 transit stops that were evaluated as part of this Transition Plan.

**Note: Costs are for signs only at 692 transit stops. (692 transit stops at \$400 per sign.)

***Note: Per meetings with the RTC the cost of pads was determined to be \$10,000. Does not include right-of-way or sidewalk connectivity costs.

****Note: Assumes 64 transit stops at \$10,000. Does not include right-of-way or sidewalk connectivity costs.

4.3. Funding Opportunities

Several alternative funding sources are available to the RTC to complete the improvements in this Transition Plan. The funding opportunities include applying for resources at the federal and state level, consideration of local options, and leveraging private resources. The following sections detail some different funding source options.

4.3.1. Federal and State Funding

Table 13 depicts the various types of federal and state funding available for the RTC to apply for funding for various improvements. The following agencies and funding options are represented in the chart.

- Better Utilizing Investments to Leverage Development Transportation Discretionary Grants (BUILD)
- Community Development Block Grants (CDBG)
- Infrastructure for Rebuilding America Discretionary Grant Program (INFRA)
- Transportation Infrastructure Finance and Innovation Act (loans) (TIFIA)
- Federal Transit Administration (FTA) Capital Funds
- Associated Transit Improvement (ATI) (1% set-aside of FTA)
- Congestion Mitigation and Air Quality Improvement Program (CMAQ)
- Highway Safety Improvement Program (HSIP)
- National Highway Performance Program (NHPP)
- Surface Transportation Block Grant Program (STBG)
- Transportation Alternatives (TA) Set-Aside (formerly Transportation Alternatives Program)
- Statewide Planning and Research (SPR)
- National Priority Safety Programs (Nonmotorized safety) (NHTSA 405)

Most of these programs are competitive type grants; therefore, the RTC is not guaranteed to receive these funds. It will be important for the RTC to track these programs to apply for the funds. Federal-aid funding programs have specific requirements that projects must meet, and eligibility must be determined on a case-by-case basis.

Table 13 – Funding Opportunities

Activity	BUILD	INFRA	TIFIA	FTA	ATI	CMAQ	HSIP	NHPP	STBG	TA	PLAN	NHTS
Access enhancements to public transportation	X	X	X	X	X	X		X	X	X		
ADA/504 Self-Evaluation/Transition Plan									X	X	X	
Bus shelters and benches	X	X	X	X	X	X		X	X	X		
Coordinator positions (state or local)						X			X	X		
Crosswalks (new or retrofit)	X	X	X	X	X	X	X	X	X	X		
Curb cut and ramps	X	X	X	X	X	X	X	X	X	X		
Paved shoulders for pedestrian use	X	X	X			X	X	X	X	X		
Pedestrian plans				X					X	X	X	
Recreational trails	X	X	X						X	X		
Shared use paths/transportation trails	X	X	X	X	X	X	X	X	X	X		
Sidewalk (new or retrofit)	X	X	X	X	X	X	X	X	X	X		
Signs/signals/signal improvements	X	X	X	X	X	X	X	X	X	X		
Signed pedestrian routes	X	X	X	X	X	X		X	X	X		
Spot improvement programs	X	X	X	X			X	X	X	X		
Storm water impacts related to pedestrian projects	X	X	X	X	X		X	X	X	X		
Trail bridges	X	X	X			X	X	X	X	X		
Trail/highway intersections	X	X	X			X	X	X	X	X		
Trailside and trailhead facilities	X	X	X						X	X		
Training						X	X		X	X	X	X
Tunnels/undercrossings for pedestrians	X	X	X	X	X	X	X	X	X	X		

Adapted from Federal Highway Administration (FHWA) *Pedestrian and Bicycle Funding Opportunities*, Revised August 9, 2018: https://www.fhwa.dot.gov/environment/bicycle_pedestrian/funding/funding_opportunities.cfm

4.3.2. Local Funding

There are several local funding options for the RTC to consider, including:

- Motor vehicle fuel tax – Road projects, reconstruction projects including ADA, multimodal improvements
- Public transportation sales tax – Road projects and transit projects, including ADA improvements
- RTC Regional Road Impact Fees (RRIF) – Capacity improvements which could include intersection improvements that incorporate ADA.

There are also funding options available to the local jurisdictions (Reno, Sparks, and Washoe County) for ADA improvements, including:

- Community Improvement District (CID) – A geographically defined district in which commercial property owners vote to impose a self-tax. Funds are then collected by the taxing authority and given to a board of directors elected by the property owners.
- General fund (sales tax and bond issue)
- Scheduled/funded CIP projects that are funded through bonds
- Sidewalk or Access Improvement Fee
- Special tax districts – A district with the power to provide some governmental or quasi-governmental service and to raise revenue by taxation, special assessment, or charges for services.
- Tax Allocation District (TAD) – A defined area where real estate property tax monies gathered above a certain threshold for a certain period of time (typically 25 years) is to be used for a specified improvement. The funds raised from a TAD are placed in a tax-free bond (finance) where the money can continue to grow. These improvements are typically for revitalization and especially to complete redevelopment efforts.
- Tax Increment Financing District (TIF) – A TIF allows cities to create special districts and to make public improvements within those districts that will generate private-sector development. During the development period, the tax base is frozen at the predevelopment level. Property taxes continue to be paid, but taxes derived from increases in assessed values (the tax increment) resulting from new development either go into a special fund created to retire bonds issued to originate the development, or leverage future growth in the district.
- Transportation Reinvestment Zone (TRZ)
- Transportation User Fee/Street Maintenance Fee

4.3.3. Private Funding

Private funding may include local and national foundations, endowments, private development, and private individuals. While obtaining private funding to provide improvements along entire corridors might be difficult, it is important for the local jurisdictions to require private developers to improve pedestrian facilities to current ADA requirements, whether it by new development or redevelopment of an existing property.

5. CONCLUSION

This document serves as the ADA Transition Plan for the RTC. In developing the Transition Plan, services were reviewed for compliance with ADA guidelines and a Self-Evaluation was conducted on the following facilities:

- Six buildings; and
- 360 transit stops.

The possible solutions were prioritized, and an implementation plan was developed to provide guidance for the RTC's improvement projects in the coming years. Public outreach was also conducted to aid in the development of the plan.

The RTC is taking the actions and will continue to look for and remedy, barriers to access to ensure that Washoe County citizens who are disabled are given access to the RTC's services. The RTC will start by addressing ADA requirements outlined in **Table 9** and then address recommended best practices.

To confirm follow-up on corrective actions required under the Transition Plan, the RTC will institute an ADA Action Log, documenting its efforts at compliance with the ADA. At a minimum, the Action Log will identify items that are not ADA compliant and will include anticipated completion dates. After the adoption of the Transition Plan by the governing body of the RTC, the ADA Action Log will be updated on an annual basis. The ADA Action Log should be available upon request. An example of the ADA Action Log that was developed based on the building and transit stops evaluated as part of this Transition Plan is located in **Volume 2 Appendix H**.

5.1. Next Steps

The RTC will continue internal coordination to address the programmatic barriers identified in the Transition Plan.

The RTC will develop a fiscally constrained RTP to include the next 20 fiscal years. Projects identified in the ADA Transition Plan will be programmed within the 20-year Plan based on prioritization provided in this document and other factors determined by the RTC, such as how barrier removal can be incorporated into existing RTC projects identified for capital improvements.

In future years, the RTC should plan to evaluate and make improvements at their remaining transit stops (approximately 650 transit stops) and evaluate remaining sidewalks along regional roads that were not included in the 2011 ADA Transition Plan.

The RTC also intends to adopt the PROWAG to enable RTC enforcement of these guidelines throughout the design and construction process of pedestrian facilities in the public right-of-way.

The RTC should establish a formal plan review and inspection process for new construction and alterations to verify compliance with PROWAG and the 2010 ADA Standards for Accessible Design.