

RESOLUTION 19-R-28 approving and authorizing transmittal of the City of Murfreesboro's Americans with Disabilities Act ("ADA") Transition Plan along with the required certification letter to the Tennessee Department of Transportation

WHEREAS, Title II of the Americans with Disabilities Act ("ADA") requires local governments to develop an ADA Transition Plan that identifies physical and structural barriers that may limit or prevent access to the City's facilities, programs, and services by individuals with disabilities and that further sets forth a plan for removing or mitigating such barriers;

WHEREAS, the Federal Highway Administration further requires the Tennessee Department of Transportation (TDOT) to ensure that every city and county with fifty (50) or more employees have an ADA Transition Plan, such plans being necessary for the receipt of federal transportation funding; and,

WHEREAS, TDOT has provided the City with deadlines for submission of compliance documentation; and,

WHEREAS, the City has complied with the first deadline (December 2016), by which the City was required to designate the City's ADA Coordinators (the Building and Codes Director and the Assistant Human Resources Director), to provide TDOT with the coordinators contact information, and to publish an ADA grievance policy; and,

WHEREAS, the City has complied with the second deadline (December 2017) by providing a written letter from the Mayor, approved by City Council, describing the City's efforts toward the development of an ADA Transition Plan; and,

WHEREAS, the City has complied with the third deadline (December 2018) by providing an update to TDOT on the status of the City's development of an ADA Transition Plan; and,

WHEREAS, the City engaged the services of Kline Swinney Associates and Wisner Consultants, LLC to evaluate the City's buildings, rights-of-way, transportation facilities, and other non-transportation facilities; and,

WHEREAS, the City and its consultants have completed the ADA Transition Plan; the executive summaries of Volumes I and II are attached hereto as Exhibits A and B respectively; and,

WHEREAS, City staff has also made an electronic copy of the City's complete ADA Transition Plan available to members of Council electronically and intend to post the Plan on the City's website upon adoption of this resolution; and

WHEREAS, the City must now comply with the final deadline (December 2019) by providing a completed copy of the City's ADA Transition plan along with a written letter from the Mayor certifying that the City has completed its ADA Transition Plan.;

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF MURFREESBORO, TENNESSEE, AS FOLLOWS:

SECTION 1. The City hereby approves and adopts the City's 2019 ADA Transition Plan, Volumes 1 and 2, and, subject to future evaluation and the availability of adequate funding, endorses the proposed schedule for eliminating the physical and structural barriers identified in the Plan.

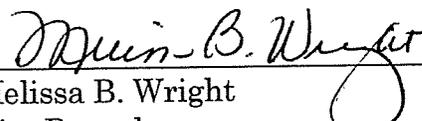
SECTION 2. The Mayor is hereby authorized to execute the appropriate legal instruments to accomplish the same, including sending a letter to the Tennessee Department of Transportation Bureau of Engineering certifying the City's completion of the ADA Transition Plan as hereby approved.

SECTION 3. This Resolution shall be effective immediately upon its passage and adoption, the public welfare and the welfare of the City requiring it.

Passed: December 5, 2019


Shane McFarland, Mayor

ATTEST:


Melissa B. Wright
City Recorder

APPROVED AS TO FORM:

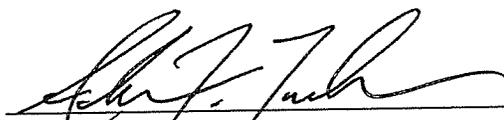
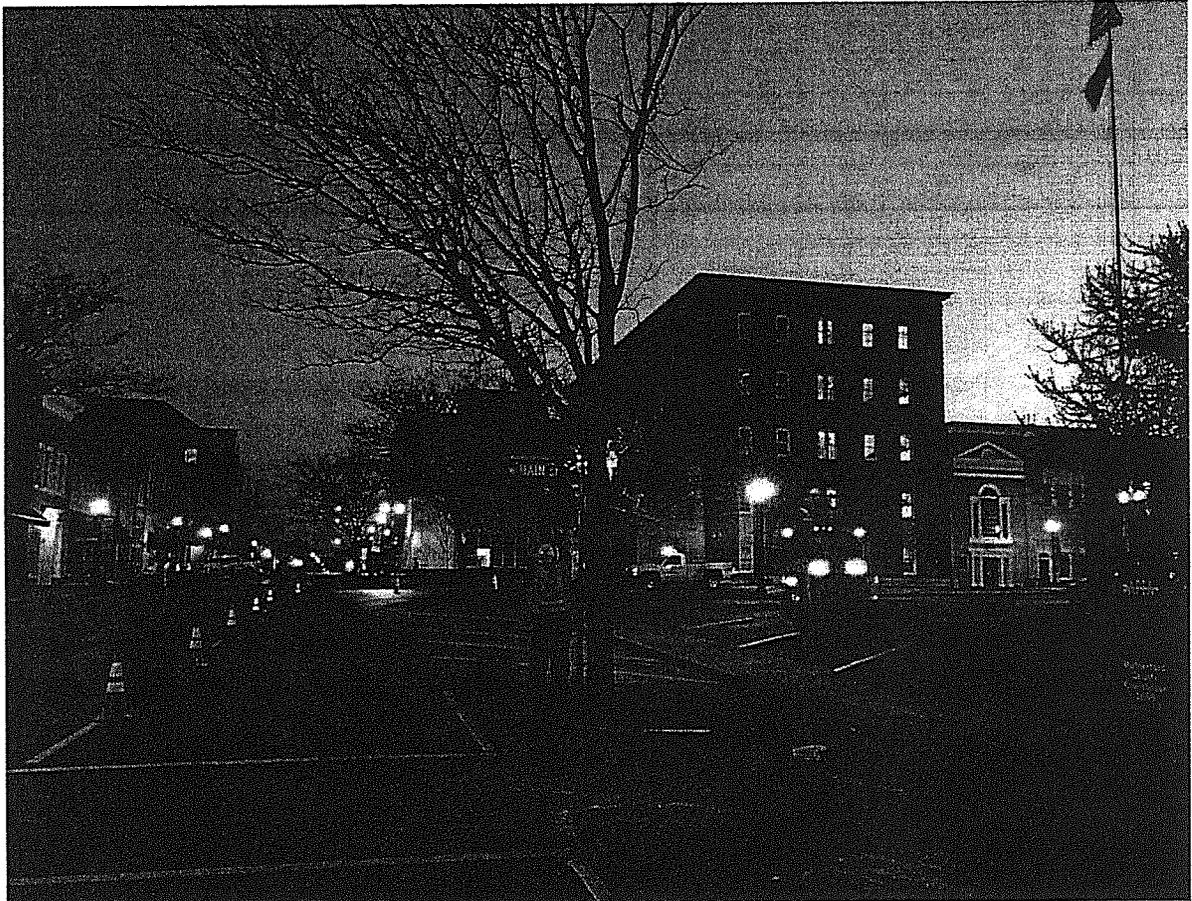

Adam F. Tucker
City Attorney



EXHIBIT A

CITY OF MURFREESBORO
ADA TRANSITION PLAN
JULY 2019
Volume I - PROWAG COMPLIANCE



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INTRODUCTION AND OVERVIEW

The City of Murfreesboro ADA Transition Plan is the summary of a three-phase approach to evaluating accessibility of the community's infrastructure and achieving compliance with the Americans with Disabilities Act.

This plan includes documentation of the following:

- ✓ The purpose and need of the document, and a summary of applicable federal law related to accessibility
- ✓ Documentation of Murfreesboro's policies and procedures related to accessibility of public rights-of-way
- ✓ Project field review guide
- ✓ Complete inventory of sidewalks, curb ramps, other facilities and their condition
- ✓ Required elements of an ADA Transition Plan – public comments, grievance procedure, appointment of ADA Coordinator, etc.

Pursuant to Title II of the ADA, public entities are prohibited from discriminating on the basis of a disability. All programs, services and activities offered by the public entity must be accessible to persons with disabilities. To accomplish this, the U. S. Department of Justice developed regulations requiring the City to conduct a self-evaluation of the accessibility of its programs and services to determine whether issues of accessibility could be addressed through changes in the way such programs and services are provided. The City is obligated to remove physical barriers to accessibility when program changes cannot ensure access to services, programs, and activities in existing facilities. Realizing structural changes would take time and money to provide, the Department of Justice Regulations, Federal Register 28 CFR Part 35 states that "in the event that structural changes to facilities will be undertaken to achieve program accessibility, a public entity that employs 50 or more persons shall develop a Transition Plan setting forth the steps necessary to complete such changes." Additionally, "if a public entity has responsibility or authority over streets, roads, or walkways, its Transition Plan shall include a schedule for providing curb ramps or other sloped areas where pedestrian walks cross curbs, giving priority to walkways serving entities covered by the Act."

The ADA Regulations further require the Transition Plan to contain the following elements:

- A. A list of physical barriers in the public facilities that limit the accessibility of its programs, services, or activities to individuals with disabilities;
- B. A detailed description of the methods to be utilized to remove these barriers and make the facilities accessible;
- C. The schedule for taking the necessary steps to achieve compliance with Title II;
- D. The name of the official responsible for the plan's implementation;
- E. A schedule for providing curb ramps or other slopes areas where pedestrian walks cross curbs.

Priorities should be given in the following order:

1. State and local government offices
2. Transportation
3. Places of public accommodation

4. Employers
 5. Other areas (e.g., residential areas where people needing curb cuts reside)
- F. The opportunity for the disability community and other interested parties to participate in the development of the Transition Plan.

APPLICABLE FEDERAL LAW

The legal background for ADA compliance is based on the following Acts and Regulations: Architectural Barriers Act (ABA – originated 1968); Rehabilitation Act (1973) – Section 504 (49 CFR Part 27); Civil Rights Restoration Act (1987); Americans with Disabilities Act (ADA) (1990); and, DOJ Implementing Regulations (28 CFR 35) There are Five Titles of ADA: Title I Employment; Title II State & Local Governments (28 CFR Part 35); Title III Public Accommodations (retail, commercial, sports complexes, movie theaters, etc.) (28 CFR Part 36); Title IV Telecommunications; and, Title V, Misc., including requirements for the U.S. Access Board to develop design guideline. The focus for the City of Murfreesboro for ADA compliance is Title II.

All federal agencies recommitted to enforcing the enforcement of the ADA in July 2010. Federal and State Agencies (on behalf of the federal government enforcing ADA) significant to be considered in the review for the City of Murfreesboro include: TDOT as the conduit for federal funds for the City as a recipient of Federal and State Funds; and, the DOJ for Title II Entities through Project Civic Access, and teamed with HUD on multi- family and housing authority cases.

Regulations and policies that must be ADA compliant were reviewed. City design standards, specifications and details were reviewed based on ADA guidance for **ADA Accessible Guidelines (ADAAG)**, and street designs based on **Proposed Right-of-Way Guidelines (PROWAG)**. The review for ADA compliance for written policies was determined on the use of detectable warnings, use of accessible pedestrian signals, designation of furniture and landscaping zones and shared use paths. Other compliance issues unveiled during the discovery process were reviewed. The Tennessee Department of Transportation (TDOT) adheres to the Federal Highway Administration's (FHWA) **Manual for Uniform Traffic Devices (MUTCD)**. The City's conformance with this guidance was evaluated for ADA compliance for traffic signals, signs and markings specifically for pedestrian pathways for pedestrian signals, signs markings and audible detection. Recommendations were made and are included in this **ADA Transition Plan**. The ADA Transition Plan and Self Evaluation Services project is part of the City's public entities' program accessibility obligations. The Field Survey Report was developed to comply with the ADA Act of 1990, Section 504 of the Rehabilitation Act of 1973, and 2010 Standards and Accessibility guidelines for Pedestrian Facilities in the Public Right-of-Way ("PROWAG") and other relevant city, state or federal laws, rules or regulations.

Among other things, the **Americans with Disabilities Act (ADA)** ensures access to the built environment for people with disabilities. ADA Standards establish design requirements for the construction and alteration of facilities subject to the law. These enforceable standards apply to places of public accommodation, commercial facilities, and state and local government facilities. The **Architectural and Transportation Barriers Compliance Board (United States Access Board)** is the federal agency responsible for developing accessibility guidelines The

Access Board is responsible for developing and updating design guidelines known as the ADA Accessibility Guidelines (ADAAG).

These guidelines are used by the Department of Justice (DOJ) and the Department of Transportation (DOT) in setting enforceable standards the public must follow. Both DOJ's and DOT's current ADA Standards are based on the Board's updated ADAAG. As a result, for the most part, these two sets of standards are very similar. However, each contains additional requirements specific to the facilities covered by the respective agencies. These additional requirements define the types of facilities covered, set effective dates, and provide additional scoping or technical requirements for those facilities. DOJ's ADA Standards apply to all facilities except public transportation facilities, which are subject to DOT's ADA Standards. The edition of the ADA Standards provided on the Board's website includes DOJ's and DOT's additional provisions. The ADA standards are issued by the Department of Justice (DOJ) and the Department of Transportation (DOT) and apply to facilities covered by the ADA in new construction and alterations.

ADA consists of five titles outlining protections in the following areas:

1. Employment
2. State and local government services
3. Public accommodations
4. Telecommunications
5. Miscellaneous provisions

Title II of ADA pertains to the programs, activities and services public entities provide. As a public entity that employs 50 or more persons, the City of Murfreesboro must comply with this section of the Act as it specifically applies to public service agencies. Title II of ADA provides that, "...no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such entity." (42 USC. Sec. 12132; 28 CFR. Sec. 35.130)

As required by Title II of ADA, 28 CFR. Part 35 Sec. 35.105 and Sec. 35.150, the City of Murfreesboro has conducted a self-evaluation of its facilities throughout the city and has developed this Transition Plan detailing how the organization will ensure those facilities are accessible to all individuals.

This Transition Plan and its implementation is overseen by the City of Murfreesboro ADA Coordinator: Robert Holtz, 111 West Vine Street, Murfreesboro, TN 3713 615-893-3750. rholtz@murfreesborotn.gov

PROGRAM ACCESS

The ADA's Section 202. Discrimination states:

... no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such entity.

The ADA's Section 204 required that the U.S. Department of Justice (DOJ) promulgate implementing regulations by 26 July 1991, one year after enactment of the legislation. These regulations are 28 CFR 28, published on July 26, 1991. 28 CFR 35.149 states:

... no otherwise qualified individual with a disability shall, because a public entity's facilities are inaccessible to 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 subjected to discrimination by any public entity. 28 CFR 35.150 states that: 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.

This statutory and regulatory language describes what is known as "program access" – a situation where all programs are readily accessible to, and usable by qualified persons with disabilities. In addition, qualified students with disabilities must be provided with equal services in as integrated a setting as possible. The determination of what is an equal and integrated setting will be made on a case-by-case basis. What is appropriate for one person with a specific impairment may not be useful or appropriate for another person with the same impairment. Failure to provide "program access" is an illegal act of discrimination under Title II of the ADA. The City must identify and correct policies and practices that have the effect of discriminating against individuals with disabilities.

PUBLIC RIGHT-OF-WAY

Public right-of-way in the City of Murfreesboro includes roadways, trails, and their adjacent facilities that serve a transportation purpose. This includes sidewalks, curb ramps, pedestrian signals, and trails that provide a transportation route. Since the Tennessee Department of Transportation has adopted the requirements of PROWAG (Public Rights-of-Way Accessibility Guidelines), this report assumes all accessibility improvements are to be done within PROWAG.

AGENCY REQUIREMENTS

Under Title II, the City of Murfreesboro must meet these general requirements:

- Must operate their programs so that, when viewed in their entirety, the programs are accessible to and useable by individuals with disabilities (28 C.F.R. Sec. 35.150).
- May not refuse to allow a person with a disability to participate in a service, program or activity simply because the person has a disability (28 C.F.R. Sec. 35.130 (a)).
- Must make reasonable modifications in policies, practices and procedures that deny equal access to individuals with disabilities unless a fundamental alteration in the program would result (28 C.F.R. Sec. 35.130(b) (7)).
- May not provide services or benefits to individuals with disabilities through programs that are separate or different unless the separate or different measures are necessary to ensure that benefits and services are equally effective (28 C.F.R. Sec. 35.130(b)(iv) & (d)).
- Must take appropriate steps to ensure that communications with applicants, participants and members of the public with disabilities are as effective as communications with others (29 C.F.R. Sec. 35.160(a)).

- Must designate at least one responsible employee to coordinate ADA compliance [28 CFR Sec. 35.107(a)]. This person is often referred to as the "ADA Coordinator." The public entity must provide the ADA coordinator's name, office address, and telephone number to all interested individuals [28 CFR Sec. 35.107(a)].
- Must provide notice of ADA requirements. All public entities, regardless of size, must provide information about the rights and protections of Title II to applicants, participants, beneficiaries, employees, and other interested persons [28 CFR Sec. 35.106]. The notice must include the identification of the employee serving as the ADA coordinator and must provide this information on an ongoing basis [28 CFR Sec. 104.8(a)].
- Must establish a grievance procedure. Public entities must adopt and publish grievance procedures providing for prompt and equitable resolution of complaints [28 CFR Sec. 35.107(b)]. This requirement provides for a timely resolution of all problems or conflicts related to ADA compliance before they escalate to litigation and/or the federal complaint process.

PURPOSE AND NEED OF THE TRANSITION PLAN

The major purpose of a Transition Plan as it relates to buildings and facilities owned and operated by a public entity is to document the existing barriers to persons with disabilities, and to propose the structural and non-structural steps to be undertaken to provide program accessibility. Many components contributed to the development of this Transition Plan including comprehensive surveys and evaluation of the architectural barriers present at City owned, operated, or utilized facilities. The term "facilities" is intended to include buildings, structures, or any part of real property that involves a specific use by persons. However, Murfreesboro's self-assessment of ADAAG was done by a separate entity. The results of that survey are in a separate report prepared by Kline Swinney Associates on behalf of the City of Murfreesboro. The Kline Swinney survey was begun in June 2019 and is scheduled for completion in September 2019, leading up to the drafting of the separate Transition Plan for ADAAG.

It is important to note that for the purposes of this Transition Plan, the date of each accessibility survey serves as the "datum" point, indicative of the state of the facility as included in the accessibility reports. While the City has been making ongoing improvements and removing barriers on a continual basis, some physical improvements listed in the detailed surveys may have begun, been partially completed, or fully completed prior to the adoption of the Transition Plan.

The City of Murfreesboro has undertaken a comprehensive evaluation of its policies, programs, and facilities (both structural and transportation) to determine the extent to which individuals with disabilities may be restricted in their access to City services and activities.

This report describes the process developed to complete the evaluation of Murfreesboro's activities, provides policy and program recommendations, and presents a Transition Plan for the modification of PROWAG facilities and programs to ensure accessibility.

This document will guide the planning and implementation of necessary program and facility modifications. It is intended to be a living document, updated and refreshed as changes occur.

The ADA Self-Evaluation and Transition Plan establishes the City's commitment to the development and maintenance of policies, programs, and facilities that include all its citizenry.

IMPLEMENTATION OF TRANSITION PLAN

With the acceptance of the final Transition Plan by the City Council, the mitigation of physical barriers in facilities and the public rights-of-way will begin.

The City of Murfreesboro's final document shall be a living document, updated as improvements in accessibility are completed. The plan shall remain available for public information and inspection.

POLICIES, PROGRAMS AND PROCEDURES

In 2019, the City conducted an evaluation of its policies, programs, and procedures to determine current levels of service and the extent to which its policies and programs created barriers to accessibility for persons with disabilities. A questionnaire administered to department staff provided information on the nature of the program, forms and methods used to advertise the program's services and activities, a profile of current participants, the types of equipment and materials used, testing and entrance requirements, the level of staff training, and any special modifications provided. Public outreach solicited concerns and recommendations regarding accessibility issues. Information provided in meetings with City staff, and input gathered at the public outreach revealed the City's existing policies, programs, and procedures may present barriers to accessibility for people with disabilities. It is the intent of the City to address the following citywide programmatic accessibility barriers through the development of Administrative Directives in the following areas:

- Customer service,
- Outreach and printed information,
- City of Murfreesboro website,
- Training and staffing,
- Public meetings,
- Facility information and signage,
- Public telephones and communication devices
- Purchasing accessible/adaptive equipment,
- Emergency evacuation procedures, and
- Maintaining accessible programs.

Additionally, when a policy, program, or procedure creates an accessibility barrier unique to a department or a certain program, the City's ADA Coordinator will coordinate with the City's Engineering Department to address the matter in the most reasonable and accommodating manner.

The City has established a procedure for anyone wishing to file a complaint alleging discrimination based on disability in the provision of services, activities, programs or benefits by the City of Murfreesboro. These forms and procedure may be found in Attachment A.

ON-GOING ACCESSIBILITY IMPROVEMENTS

Opportunities for further improvement of City services and facilities for ADA compliance will continue to arise as advances are made in technology and the provision of programs for people with disabilities. Additionally, as the City acquires new facilities and develops new programs, it will be necessary to review each for access compliance. It is the intent of the City to keep its programs up to date through increased community involvement and partnerships with organizations of and those offering services to persons with disabilities. All new facilities must comply with ADA design standards for new construction throughout the entire facility and not just in the public access areas.

MEASURING THE SUCCESS OF THE TRANSITION PLAN

It is the intent of the City to periodically evaluate the success of improving access to its programs by compiling statistical measures of success. Examples of such measures of success include:

- Measuring the level of public participation in programs.
- Revising evaluation forms to include questions about how adequately special needs were met.
- Tracking the number of people with disabilities who participate in selected programs.
- Tracking the number of requests for programs that are accessible to people with disabilities.
- Tracking attendance and repeat registrants.
- Asking staff to evaluate the success of a program.
- Surveying program participants about desired improvements.
- Conducting an initial assessment/suggestion box program for accessibility.
- Soliciting feedback from personal contact (i.e., word-of-mouth).
- Comparing programs to goals and objectives published by the federal government.
- Preparing and distributing a participants' questionnaire to measure increases in participation, and, where appropriate, socialization, health, and self-esteem.

EFFECTIVE COMMUNICATION REQUIREMENTS

28 CFR § 35.163(a) requires the City to provide information to individuals with disabilities concerning accessible services, activities, and facilities.

28 CFR § 35.160 requires the City to take such steps as may be necessary to ensure communications with applicants, participants, and members of the public with disabilities are as effective as communications with others. The City of Murfreesboro's communication is designed for all citizens and interested parties.

28 CFR § 35.160 (b)(1) requires the City to furnish appropriate auxiliary aids and services when necessary to afford an individual with a disability an equal opportunity to participate in, and enjoy the benefits of the City's services, programs, or activities when viewed in their entirety. Murfreesboro has a program to provide the necessary communication aids to citizens with needs for those aids. Citizens with those needs request the auxiliary aids and services by contacting the ADA Coordinator, Robert Holtz, 111 West Vine Street, Murfreesboro, TN 3713 615-893-3750.

rholtz@murfreesborotn.gov . The City makes every effort to provide the auxiliary aid and/or service requested by the individual. The City of Murfreesboro will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in the City's programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.

The following are primary sources for obtaining interpreter services:

PROGRAM ACCESSIBILITY TOOLKIT

To facilitate access to City programs by all citizens, the City will assemble a toolkit of information designed to assist its staff in communicating with and providing customer service to individuals with a variety of disabilities. The City will periodically review the components of the toolkit, as new technologies become available, to ensure the best types of technology are being used to improve accessibility to City services and programs.

TELECOMMUNICATION DEVICES FOR THE DEAF (TDD'S)

28 CFR § 35.161 requires that, where a public entity communicates with applicants and beneficiaries by telephone, TDD's or equally effective telecommunication systems be used to communicate with individuals with impaired speech or hearing.

The City of Murfreesboro, TN provides telephone emergency services by which individuals can seek immediate assistance from police, fire, ambulance, and other emergency services. This telephone emergency service -- including "911" services -- are an important public service whose reliability can be a matter of life or death. The Murfreesboro 911 service consoles are TTY capable.

INFORMATION AND SIGNAGE

28 CFR § 35.163 (b) requires a public entity to provide signage at all inaccessible entrances of each facility that directs users to an accessible entrance or to a location with information about accessible facilities. The City makes every effort to provide this signage at the appropriate locations.

PEDESTRIAN FACILITIES IN THE PUBLIC RIGHT-OF-WAY ACCESSIBILITY

INTRODUCTION

The purpose of this part of this plan is to ensure the City of Murfreesboro creates reasonable, accessible paths of travel in the public right-of-way for everyone, including people with disabilities. The self-evaluation identifies physical barriers and prioritizes improvements that should be made throughout the City. This Transition Plan describes the existing policies and programs to enhance overall pedestrian accessibility.

SIDEWALKS, CURB RAMPS AND PEDESTRIAN SIGNALS PROGRAMS

The City of Murfreesboro has several programs devoted to making the City's streets, curb ramps and pedestrian signals more accessible.

- **New Development and Infill Program:** New development projects and those projects occurring as infill or redevelopment are required to install sidewalks and ADA-compliant curb ramps.
- **Citizen Request Program:** Citizens can submit a request to have a new curb ramp installed or an existing curb ramp repaired at any location within the City.
- **Annual Installation, Repair, and Maintenance Program:** On an annual basis, the City's Street Department repairs sidewalks and installs new PROWAG-compliant curb ramps as part of routine maintenance.
- **Street-Related Capital Improvement Projects:** Sidewalks, curb ramps and pedestrian signals are installed and/or repaired in all street-related capital improvement projects (e.g., street widening or other street upgrades).
- **Federally Aided Street Overlay Construction Projects:** The City is required to include the retrofit of existing, non-compliant curb ramps to comply with prevailing PROWAG standards as part of federally aided street overlay projects. It is the goal of the City to continue its efforts to improve pedestrian accessibility.

SELF-EVALUATION OF PEDESTRIAN ACCESS TO PUBLIC RIGHT-OF-WAY

The guidance used in the evaluations are based on Public Right-of-Way Accessibility Guidelines (PROWAG) for Pedestrian Facilities in the Public Right-of-Way (ADA Guidelines) from the U.S. Architectural and Transportation Barriers Compliance Board as well as the standards that the Tennessee Department of Transportation (TDOT) requires for compliance when more restrictive than PROWAG. The City of Murfreesboro has a two-tiered system to identify and assess obstacles in the public right-of-way:

- 1) Self-Evaluation of curb ramps, sidewalks and pedestrian crossings at signalized intersections for compliance with PROWAG TDOT
- 2) Detailed Evaluation of Remediation, Costs of Remediation and Priority for Remediation

Self-Evaluation of the curb ramps, sidewalks and pedestrian signals was completed in June of 2019. The purpose of the evaluation was to determine which features are non-compliant to PROWAG and TDOT Guidelines which may be more restrictive, and to have the highest priority non-complying items under construction as soon as practical and develop a comprehensive overview of the complete pedestrian network. Detailed descriptions of the PROWAG evaluation for potential remediation, costs of remediation and priority for remediation were also performed. The surveys provide the City in depth detail of architectural barriers that prevent people with disabilities from using its pedestrian public rights-of-way and participating in its programs.

The City has been provided digital summaries of the self-evaluation summaries as an ARC geodata base that can be queried by street sidewalk segments and by individual sidewalk, pedestrian signal and curb ramp PIN designations. There were approximately 20,000 potential barriers that were evaluated. In order to manage and utilize the large amount of data, the City has been provided digital KMZ files with ARC GIS data files. Included in the data sets are individual barrier PIN designations, hyperlinks to the street view of the barrier where available descriptions of non-compliant curb ramp, sidewalk and pedestrian signal individual barrier and

estimated remediation costs. An excel summary by street segment for the individual sidewalk barriers evaluated were are included in the full report in Appendix B. The ARC GIS data and maps will be available to the public on the City website.

PRIORITIES

Remediation priority and total estimated cost for remediation of the architectural barriers are as follows:

Curb Ramps	1	\$ 3,123,810
Pedestrian Signals	2	\$ 1,477,225
Sidewalks	3	\$14,461,175
TOTAL		\$19,062,210

The basis for assignment of remediation priority are

- 1) pedestrian traffic volume, and
- 2) where safety is a concern with higher volume vehicle traffic.

The main criteria for pedestrian accessibility priority for curb ramps and sidewalks is the volume of pedestrian traffic and the probable geographic locations where disabled citizens may use the pedestrian pathways. Higher priority should be assigned for pedestrian signals for non-compliant feature locations where there are high volumes of vehicle traffic on arterial and collector streets and safety is of greater concern.

SELF-EVALUATION REPORTS

The City has been provided digital summaries of the self-evaluation summaries as an ARC geodata base that can be queried by street sidewalk segments and by individual sidewalk, pedestrian signal and curb ramp PIN designations and submitted to the City in digital format. A self-evaluation report has been produced for each curb ramp, sidewalk and pedestrian signal. Remediation methods, costs and priorities have been determined and presented in Attachment B for the street sidewalk barriers. The self-evaluation report has been compiled for each feature in accordance with PROWAG and TDOT guidance for accessibility. Collection was performed using the City’s planimetric maps, Google Earth and Street View, lidar and lady bug camera capture, and field surveys. Presentation of the data is with ArcGIS geodatabases and Excel data bases to organize and memorialize the data sets. This allows querying of the data sets to provide grouping of the data for analysis such as costs and priorities. Barriers are organized by architectural element attribute and located by PIN reference designation. A summary of the estimated remediation costs by street sidewalk priority has been provided. The complete self-evaluation survey for each sidewalk segment by street is provided in Attachment B. A presentation of the collection attributes is provided as well in Attachment B along with a hyperlink of each item(s) requiring remediation for compliance to PROWAG and TDOT.

POLICIES FOR NEW CONSTRUCTION & ALTERATIONS

To ensure the correct design of curb ramps, and sidewalks is applied in new construction and alterations, the City of Murfreesboro will construct curb ramps, sidewalks and pedestrian signals

to prevalent ADA design guidelines, where feasible and reasonable.

REPORTING

Murfreesboro will be using two methods to help keep the public and city officials up to date on the progress made in removing barriers. First Method: The Engineering Department will submit an annual report to the Assistant City Manager who will submit it to the City Council. The report will summarize accomplishments from the previous year, plans for the current year and any anticipated challenges that need to be addressed. Second Method: The City of Murfreesboro's Website has a separate section devoted to ADA rules, plans, contact information, policies, ordinances, and reports. The Annual Report to the City Council will be posted here for public review. The website will also provide a method for concerns and complaints about accessibility city-wide. Complaints will be retrieved by the ADA Coordinator. Response will be made within 36 hours in the absence of unusual circumstances.

TRAINING

The City of Murfreesboro has initiated a training program to ensure its staff is prepared for implementation of the Public Facilities & Public Rights of Way transition plans. The plan considers types of training based on the level and type of involvement of each staff member with the ADA Transition Plan implementation. After the initial training, follow-up training will be provided on an annual basis. Overview Training: Department Heads and key management staff will attend a seminar covering the law and practical applications of the elements of the law. Design Staff Training: Design Personnel will attend a seminar covering current ADA design practices and techniques to improve construction plans preparation and review as they relate to ADA Compliance. Inspection Staff Training: Inspection personnel and code enforcement personnel will attend a seminar covering inspection techniques for ADA Compliance. Construction Staff Training: Street and inspection personnel will attend a training session. This training session should include information on the techniques used to install sidewalks, curb ramps and other ROW appurtenances that comply with ADA regulations.

ESTIMATED CONSTRUCTION COSTS

Remediation should be performed to comply with PROWAG and TDOT standards to provide accessibility. Attachment B contains the detailed summary report for the accessibility remediation for each architectural barrier. There are also digital summaries, ARC GIS geodatabase sets and Excel summaries by sidewalk segment and PIN barrier that the City has been provided.

The City will determine the final remediation sequence based on the funding source and their annual budgets. Deviation from this guide and sequencing is anticipated.

The following 3 summaries are presented as a guide for the City to establish a budget and a priority order for remediation:

- Estimated Remediation Cost by Barrier Type
- Estimated Remediation Costs for Sidewalk Barriers
- Remediation Priority Ranking

The sequencing guide shows remediation of curb ramps throughout the City as the highest priority. Curb ramps can be performed with maintenance funding and may not require engineering design. Curb ramps generally provide the greatest benefit to the disabled pedestrian and creates the most impact throughout the City. The simplest and least expensive impact is the provision of truncated domes where ramp remediation is not required. Curb ramp modification should be first performed in the high pedestrian areas including the downtown and near downtown areas, near MTSU and school zones and on State highways where full sidewalk segments don't need replacing.

Pedestrian signal remediation is shown to be the second highest priority. Pedestrian signal remediation for existing signalized intersections is essential for safety issues and should be programmed early in the execution of the transition plan.

Sidewalk barriers are broken down into subclasses and are generally the most expensive of the remediation classes. Some barriers such as trimming trees and scrubs can be a part of an ongoing maintenance program that the City can develop using the self-evaluations as a guide. There are a large number of driveway ramps and broken sidewalks that need remediation which are higher costs. Because of the large number of non-compliant items in a number of sidewalk segments, many of these more expensive projects may be able to be constructed and funded with TDOT and FHWA matching funds.

ESTIMATED REMEDIATION COSTS BY BARRIER TYPE (PROWAG)

Barrier Type	Barrier Type Costs	Barrier %%%
Curb Ramps Barriers	\$3,123,810	16.39%
Pedestrian Signal Barriers	\$1,477,225	7.75%
Sidewalk Barriers	\$14,461,175	75.86%
Total:	\$19,062,210	100.00%

REMEDATION PRIORITY RANKING

Remediation Class	Priority Ranking	Class Costs
Curb Ramps	1	\$3,123,810
Pedestrian Signals	2	\$1,477,225
Sidewalks (Subclass)	3	\$7,796,195
Sidewalks (Subclass)	4	\$3,737,170
Sidewalks (Subclass)	5	\$2,927,800
Total:		\$19,062,200

ESTIMATED REMEDIATION COSTS FOR SIDEWALK BARRIERS SUBCLASSES

Street	Sidewalk Barriers Costs By Subclass	Barrier %%%
4th Avenue	\$625	0.00%
Abbie Road	\$1,250	0.01%
Admiral Nimitz Boulevard	\$0	0.00%
Agripark Drive	\$5,250	0.04%
Alexander Boulevard	\$0	0.00%
Allenby Trail	\$0	0.00%
Allerton Way	\$0	0.00%
Allgrin Court	\$0	0.00%
Almar Knot Drive	\$5,000	0.03%
Alumni Drive	\$0	0.00%
Alysheba Run	\$0	0.00%
Amaranth Avenue	\$0	0.00%
Amber Glen Court	\$8,850	0.06%
Ambergate Drive	\$0	0.00%
Amberwood Circle	\$21,425	0.15%
Anthem Way	\$0	0.00%
Apostle Lane	\$0	0.00%
Apple Cross Court	\$0	0.00%
Aristocrate Drive	\$0	0.00%
Arkow Lane	\$0	0.00%
Armada Drive	\$50	0.00%
Arnhart Drive	\$0	0.00%
Asbury Lane	\$3,750	0.03%
Asbury Road	\$0	0.00%
Ascot Close	\$6,875	0.05%
Ashers Fork Drive	\$0	0.00%
Ashford Court	\$0	0.00%
Attleboro Drive	\$0	0.00%
Audubon Lane	\$0	0.00%
Autumn Oakes Court	\$2,500	0.02%
Avenue Way	\$1,150	0.01%
Avenwater Run	\$0	0.00%
Avery Drive	\$0	0.00%
Avington Court	\$2,200	0.02%
Avington Way	\$0	0.00%
Axelwood Drive	\$0	0.00%
Aztec Drive	\$22,800	0.16%
Aztec Drive	\$0	0.00%
Balmoral Way	\$5,000	0.03%
Balson Drive	\$3,600	0.02%
Banyon Drive	\$0	0.00%
Barclay Court	\$500	0.00%
Barnsley Drive	\$0	0.00%
Barwood Drive	\$0	0.00%
Battalion Boulevard	\$0	0.00%
Battle Avenue	\$103,850	0.72%
Battleground Drive	\$0	0.00%

ESTIMATED REMEDIATION COSTS FOR SIDEWALK BARRIERS SUBCLASSES

Street	Sidewalk Barriers Costs By Subclass	Barrier %%%
Baulcom Court	\$0	0.00%
Bear Branch Cove	\$300	0.00%
Beasie Road	\$0	0.00%
Beulah Court	\$0	0.00%
Bella Vida Place	\$0	0.00%
Belle Haven Drive	\$0	0.00%
Belle Rive Drive	\$0	0.00%
Berry Place	\$24,200	0.17%
Berryhill Drive	\$0	0.00%
Berryhill Drive	\$0	0.00%
Bertram Court	\$0	0.00%
Berwick Drive	\$0	0.00%
Beryl Drive	\$0	0.00%
Bethany Circle	\$0	0.00%
Bigbee Court	\$0	0.00%
Bilbrey Drive	\$200	0.00%
Bill Smith Drive	\$0	0.00%
Billingham Drive	\$0	0.00%
Billy Boulevard	\$200	0.00%
Birchtree Drive	\$0	0.00%
Blackfoot Trail	\$0	0.00%
Blackman Burrows Lane	\$0	0.00%
Blackman Woods Court	\$0	0.00%
Blackpool Court	\$0	0.00%
Blackwater Drive	\$0	0.00%
Blackwell Boulevard	\$0	0.00%
Blakely Drive	\$0	0.00%
Blanchard Lane	\$0	0.00%
Blaze Drive	\$0	0.00%
Blooming Oak Place	\$0	0.00%
Bluespruce Way	\$0	0.00%
Bluestem Lane	\$0	0.00%
Boxelder Way	\$0	0.00%
Boyd Drive	\$10,700	0.07%
Bradberry Drive	\$0	0.00%
Bradyville Pike	\$0	0.00%
Brandy Keg Creek Drive	\$0	0.00%
Brazelton Court	\$0	0.00%
Breckenridge Drive	\$0	0.00%
Bridge Avenue	\$183,700	1.27%
Brinkley Road	\$0	0.00%
Brinxton Run	\$0	0.00%
Broad Lands Drive	\$0	0.00%
Broadmoor Boulevard	\$0	0.00%
Brook Highland	\$0	0.00%
Brookside Path	\$0	0.00%
Brown Drive	\$10,250	0.07%
Buck Cherry Way	\$0	0.00%
Buckingham Drive	\$0	0.00%
Buckthorne Way	\$0	0.00%
Bud Court	\$0	0.00%

ESTIMATED REMEDIATION COSTS FOR SIDEWALK BARRIERS SUBCLASSES

Street	Sidewalk Barriers Costs By Subclass	Barrier %%%
Buffalo River Drive	\$0	0.00%
Bumblebee Drive	\$0	0.00%
Burgess Street	\$0	0.00%
Burlington Court	\$0	0.00%
Burns Court	\$0	0.00%
Burnside Drive	\$0	0.00%
Burrows Avenue	\$0	0.00%
Business Campus Drive	\$400	0.00%
Butterfly Bend	\$0	0.00%
Butterfly Boulevard	\$100	0.00%
Calendula Way	\$0	0.00%
Cally Street	\$0	0.00%
Campfire Drive	\$0	0.00%
Cancun Lane	\$0	0.00%
Candlewick Court	\$0	0.00%
Cannonsgate Lane	\$0	0.00%
Caraway Drive	\$1,500	0.01%
Carboncopy Court	\$0	0.00%
Carl Adams Drive	\$0	0.00%
Carly Court	\$0	0.00%
Carmel Drive	\$0	0.00%
Cason Lane	\$232,500	1.61%
Cason Trail	\$130,050	0.90%
Castleford Drive	\$400	0.00%
Castleton Drive	\$0	0.00%
Castlewood Drive	\$0	0.00%
Cavendish Drive	\$1,250	0.01%
Cedar Glades Drive	\$0	0.00%
Central Park Court	\$0	0.00%
Centurion Way	\$0	0.00%
Chamberlain Drive	\$0	0.00%
Chandler Place	\$0	0.00%
Chapel Court	\$0	0.00%
Charleston Boulevard	\$0	0.00%
Charleston Court	\$0	0.00%
Chaucer Drive	\$0	0.00%
Chelmsford Court	\$0	0.00%
Cherokee Court	\$67,100	0.46%
Cherry Blossom Lane	\$0	0.00%
Cherry Lane	\$14,725	0.10%
Cherry Lane Drive	\$1,875	0.01%
Chickamauga Drive	\$0	0.00%
Chickasaw Road	\$51,600	0.36%
Chinoe Drive	\$0	0.00%
Chipara Drive	\$0	0.00%
Chippen Court	\$0	0.00%
Chopin Court	\$0	0.00%
Chopin Court South	\$0	0.00%

ESTIMATED REMEDIATION COSTS FOR SIDEWALK BARRIERS SUBCLASSES

Street	Sidewalk Barriers Costs By Subclass	Barrier %%%
Clarence Court	\$3,125	0.02%
Clay Mills Drive	\$0	0.00%
Cloister Drive	\$0	0.00%
Clovercroft Drive	\$0	0.00%
Cloverfields Court	\$0	0.00%
Cloverhill Drive	\$0	0.00%
Cobia Drive	\$0	0.00%
Colchester Court	\$0	0.00%
College Heights	\$1,850	0.01%
Columnar Court	\$0	0.00%
Colyn Avenue	\$100	0.00%
Comer Circle	\$1,250	0.01%
Comer Drive	\$3,000	0.02%
Community Circle	\$0	0.00%
Compton Road	\$625	0.00%
Conference Center Boulevard	\$0	0.00%
Conquer Drive Boulevard	\$0	0.00%
Conquest Road Boulevard	\$0	0.00%
Contessa Drive Boulevard	\$0	0.00%
Cornerstone Street Boulevard	\$0	0.00%
Cortez Drive Boulevard	\$0	0.00%
Cottingham Drive	\$0	0.00%
Country Almond Way	\$0	0.00%
County Farm Road	\$15,000	0.10%
Covenant Boulevard	\$800	0.01%
Coventry Lane	\$200	0.00%
Craythorne Drive	\$0	0.00%
Creek Oak Drive	\$0	0.00%
Creekview Drive	\$18,000	0.12%
Crestland Avenue	\$1,250	0.01%
Crossway Avenue	\$0	0.00%
Crown Court	\$1,875	0.01%
Crowne Pointe Drive	\$3,250	0.02%
Crusade Road	\$0	0.00%
Cushing Avenue	\$0	0.00%
Dallas Court	\$0	0.00%
Deerfield Drive	\$0	0.00%
Dejarnette Lane	\$4,150	0.03%
Desoto Court	\$0	0.00%
Dewdrop Court	\$0	0.00%
Dewington Drive	\$0	0.00%
Dewsbury Drive	\$0	0.00%
Dickens Court	\$0	0.00%
Dill Lane	\$0	0.00%

ESTIMATED REMEDIATION COSTS FOR SIDEWALK BARRIERS SUBCLASSES

Street	Sidewalk Barriers Costs By Subclass	Barrier %%%
Dizzy Dean Drive	\$0	0.00%
Dora Elizabeth Court	\$16,250	0.11%
Downing Court	\$0	0.00%
Drayton Drive	\$0	0.00%
Drusilla Drive	\$0	0.00%
Dublin Court	\$0	0.00%
Dunraven Drive	\$0	0.00%
Eaglecliff Court	\$0	0.00%
Earl Court	\$0	0.00%
Earline Way	\$0	0.00%
East Bell Street	\$423,750	2.93%
East Burton Street	\$185,775	1.28%
East Castle Street	\$113,125	0.78%
East College Street	\$94,550	0.65%
East Kingwood Drive	\$0	0.00%
East Lokey Avenue	\$42,125	0.29%
East Lytle Street	\$347,575	2.40%
East Main Street	\$453,150	3.13%
East McKnight Drive	\$1,250	0.01%
East Northfield Boulevard	\$370,875	2.56%
East Oak Street	\$16,100	0.11%
East Sevier Street	\$70,300	0.49%
East State Street	\$61,150	0.42%
East Vine Street	\$323,075	2.23%
Edna May Drive	\$0	0.00%
Effie Seward Drive	\$0	0.00%
Elaina Lane	\$0	0.00%
Elam Farms Parkway	\$0	0.00%
Elderberry Way	\$1,250	0.01%
Eldin Creek Drive	\$0	0.00%
Elijah Drive	\$100	0.00%
Elrod Street	\$0	0.00%
Empire Boulevard	\$0	0.00%
Enclave Drive	\$6,450	0.04%
Ennismore Court	\$0	0.00%
Essex Court	\$0	0.00%
Ewing Boulevard	\$87,475	0.60%
Fairground Avenue	\$0	0.00%
Fairhaven Lane	\$0	0.00%
Fallen Acorn Court	\$10,625	0.07%
Fallenwood Drive	\$0	0.00%
Faran David Court	\$0	0.00%
Faulkner Springs Drive	\$0	0.00%
February Street	\$25,350	0.18%
Firefly Place	\$0	0.00%
Firerock Drive	\$0	0.00%
First Avenue	\$3,450	0.02%
Fletz Circle	\$0	0.00%
Floral Court	\$0	0.00%
Florence Road	\$9,875	0.07%
Folcroft Drive	\$0	0.00%

ESTIMATED REMEDIATION COSTS FOR SIDEWALK BARRIERS SUBCLASSES

Street	Sidewalk Barriers Costs By Subclass	Barrier %%%
Forsman Court	\$0	0.00%
Fortress Boulevard	\$5,200	0.04%
Foundry Circle	\$1,000	0.01%
Fox Creek Drive	\$0	0.00%
Fox Point Court	\$0	0.00%
Foxside Lane	\$0	0.00%
Foxworth Court	\$0	0.00%
Frank Robinson Drive	\$0	0.00%
Franklin Road	\$2,250	0.02%
Frogtown Lane	\$0	0.00%
Gallant Way	\$0	0.00%
Galston Court	\$625	0.00%
Garcia Boulevard	\$200	0.00%
Gardenia Way	\$0	0.00%
Garrison Drive	\$0	0.00%
Gary Bowman Court	\$0	0.00%
Gateway Boulevard	\$0	0.00%
General Mills Way	\$0	0.00%
Geneva Drive	\$0	0.00%
Genoa Drive	\$0	0.00%
George Washington Boulevard	\$0	0.00%
Ginger Court	\$0	0.00%
Glebe Court	\$0	0.00%
Glenside Court	\$700	0.00%
Go USA Court	\$0	0.00%
Gold Valley Drive	\$3,000	0.02%
Goodwin Lane	\$0	0.00%
Goose Creek Lane	\$0	0.00%
Granite Springs Way	\$0	0.00%
Green Acres Lane	\$0	0.00%
Greenbrier Court	\$9,000	0.06%
Greenbrier Court / Shawnee Drive	\$42,200	0.29%
Greenland Drive	\$115,550	0.80%
Greenock Drive	\$200	0.00%
Greenway Drive	\$0	0.00%
Greshampark Drive	\$250	0.00%
Halls Hill Pike	\$0	0.00%
Hammock Drive	\$10,625	0.07%
Hampton Turner Drive	\$0	0.00%
Hannah Drive	\$0	0.00%
Hardwood Drive	\$1,250	0.01%
Harpering Lane	\$0	0.00%
Hartlepool Drive	\$100	0.00%
Hatteras Court	\$0	0.00%
Haviland Way	\$0	0.00%
Heather Place	\$0	0.00%
Hensfield Drive	\$0	0.00%
Hickory Bell Drive	\$0	0.00%
Hillwood Boulevard	\$0	0.00%
Holderwood Drive	\$0	0.00%
Honeybee Drive	\$0	0.00%
Hope Way	\$0	0.00%
Houston Drive	\$1,950	0.01%
Hyannis Drive	\$0	0.00%
Hyde Court	\$0	0.00%

ESTIMATED REMEDIATION COSTS FOR SIDEWALK BARRIERS SUBCLASSES

Street	Sidewalk Barriers Costs By Subclass	Barrier %%%
Hyle Avenue	\$0	0.00%
Indian Creek Boulevard	\$0	0.00%
Indian Park Drive	\$0	0.00%
Innsbrooke Boulevard	\$31,500	0.22%
Ironwood Court	\$8,125	0.06%
Islington Drive	\$0	0.00%
Jack Byrnes Drive	\$0	0.00%
Jackson Alan Drive	\$0	0.00%
Jackson Street	\$0	0.00%
James Edmon Court	\$10,625	0.07%
Jamison Place Court	\$0	0.00%
Janell Trail	\$0	0.00%
January Street	\$36,500	0.25%
Jenkins Drive	\$1,350	0.01%
Jerry Anderson Drive	\$0	0.00%
Jillson Court	\$0	0.00%
Jim Houston Court	\$21,450	0.15%
Joben Drive	\$100	0.00%
Joe B Jackson Parkway	\$7,500	0.05%
John Lee Lane	\$0	0.00%
John R. Rice Boulevard	\$7,950	0.05%
Jones Boulevard	\$42,375	0.29%
Jordan Avenue	\$0	0.00%
Jose Way	\$0	0.00%
Joseph Court	\$0	0.00%
Journey Drive	\$6,000	0.04%
Julian Way	\$0	0.00%
June Bug Drive	\$0	0.00%
Juneberry Way	\$0	0.00%
Jupiter Place	\$10,350	0.07%
Kadyday Way	\$0	0.00%
Kanatak Lane	\$0	0.00%
Katydid Crossing	\$0	0.00%
Kaylee Circle	\$0	0.00%
Kedzie Drive	\$625	0.00%
Keegan Drive	\$0	0.00%
Kellener Drive	\$0	0.00%
Kemp Way	\$0	0.00%
Kennedy Drive	\$625	0.00%
Kensington Drive	\$3,900	0.03%
Kerr Avenue	\$44,100	0.30%
Kingdom Drive	\$0	0.00%
Kings Highway	\$70,750	0.49%
Kings Ridge Drive	\$0	0.00%
Kingwood Drive	\$0	0.00%
Kinsale Avenue	\$0	0.00%
Kipling Court	\$0	0.00%
Kirk Lane	\$0	0.00%

ESTIMATED REMEDIATION COSTS FOR SIDEWALK BARRIERS SUBCLASSES

Street	Sidewalk Barriers Costs By Subclass	Barrier %%%
Kitty Court	\$0	0.00%
Kuchar Court	\$0	0.00%
Kybald Court	\$0	0.00%
Lacing Lane	\$0	0.00%
Lady Bug Lane	\$0	0.00%
Lady Thatcher Drive	\$0	0.00%
Lambeth Drive	\$1,250	0.01%
Lansdan Drive	\$0	0.00%
Lantern Lane	\$0	0.00%
Larkspur Lane	\$0	0.00%
Lawncrest Cove	\$0	0.00%
Lazarus Way	\$0	0.00%
Leaf Avenue	\$0	0.00%
Leatherwood Drive	\$0	0.00%
Lee Street	\$0	0.00%
Legare Court	\$0	0.00%
Leipers Fork Trail	\$0	0.00%
Lenox Cove	\$0	0.00%
Leslie Lane	\$0	0.00%
Lewis Circle	\$8,125	0.06%
Licinius Lane	\$0	0.00%
Lightning Bug Drive	\$0	0.00%
Lionheart Drive	\$0	0.00%
Locerbie Drive	\$10,000	0.07%
Lockwood Court	\$0	0.00%
Locus Lane	\$0	0.00%
Longford Drive	\$0	0.00%
Lt Patrick McBride Drive	\$0	0.00%
Luke Court	\$12,000	0.08%
Luna Moth Lane	\$0	0.00%
Lunette Drive	\$0	0.00%
Mack Court	\$0	0.00%
Mackintosh Lane	\$0	0.00%
Mall Circle Drive	\$0	0.00%
Manson Crossing Drive	\$0	0.00%
Manson Pike	\$100	0.00%
Maple Tree Court	\$0	0.00%
Maplegrove Drive	\$0	0.00%
Mapleside Lane	\$0	0.00%
Maplewood Court	\$0	0.00%
Margaret Close	\$7,500	0.05%
Maricopa Drive	\$0	0.00%
Marigold Drive	\$0	0.00%
Marilyn Court	\$17,325	0.12%
Marylake Way	\$0	0.00%
Marymont Springs Boulevard	\$0	0.00%

ESTIMATED REMEDIATION COSTS FOR SIDEWALK BARRIERS SUBCLASSES

Street	Sidewalk Barriers Costs By Subclass	Barrier %%%
Maryweather Lane	\$0	0.00%
Masterpiece Avenue	\$0	0.00%
Maximillion Circle	\$0	0.00%
Maybrook Court	\$400	0.00%
Maylon Drive	\$0	0.00%
Mayoral Court	\$0	0.00%
McKinley Place	\$0	0.00%
Meadowcrest Cove	\$4,375	0.03%
Medical Center Parkway	\$43,350	0.30%
Meigs Drive	\$825	0.01%
Memorial Boulevard	\$476,800	3.30%
Mercy Court	\$5,000	0.03%
Mershon Drive	\$0	0.00%
Middle Tennessee Boulevard	\$96,950	0.67%
Middlebury Drive	\$100	0.00%
Milkweed Drive	\$0	0.00%
Minerva Drive	\$21,500	0.15%
Minor Street	\$33,200	0.23%
Miranda Drive	\$0	0.00%
Missionary Way	\$0	0.00%
Molly Trail	\$1,250	0.01%
Monrovia Drive	\$0	0.00%
Mordecai Avenue	\$0	0.00%
Morgan Taylor Drive	\$0	0.00%
Morning Mist Court	\$0	0.00%
Morning Mist Way	\$0	0.00%
Mosaic Trail	\$0	0.00%
Mountain Maple Court Barriers Remediation Costs:	\$0	0.00%
Nancy Seward Drive Barriers Remediation Costs:	\$0	0.00%
Nature Drive	\$0	0.00%
Newport Court	\$0	0.00%
Nightcap Lane	\$0	0.00%
Nightcap Lane	\$3,000	0.02%
Norris Lane	\$6,500	0.04%
North Academy Street	\$20,900	0.14%
North Baird Lane	\$0	0.00%
North Bilbro Avenue	\$0	0.00%
North Church Street	\$159,070	1.10%
North Church Street	\$93,250	0.64%
North Highland Avenue	\$40,750	0.28%
North Maney Avenue	\$190,700	1.32%
North Maple Street	\$452,250	3.13%
North Public Square	\$143,700	0.99%
North Rutherford Boulevard	\$61,000	0.42%
North Spring Street	\$31,000	0.21%

ESTIMATED REMEDIATION COSTS FOR SIDEWALK BARRIERS SUBCLASSES

Street	Sidewalk Barriers Costs By Subclass	Barrier %%%
North Tennessee Boulevard	\$32,800	0.23%
North Thompson Lane	\$85,825	0.59%
North University Street	\$38,875	0.27%
North Walnut Street	\$135,050	0.93%
NW Broad Street	\$1,402,150	9.70%
NYU Place	\$0	0.00%
Oakleigh Cove	\$0	0.00%
Oakleigh Drive	\$7,500	0.05%
Oakside Court	\$0	0.00%
Oakton Burrows Lane	\$0	0.00%
Old Fort Parkway	\$104,100	0.72%
Old Lascassas Highway	\$9,975	0.07%
Olive Street	\$4,000	0.03%
Olivet Drive	\$0	0.00%
Olmstead Court	\$0	0.00%
Orange Blossom Court	\$0	0.00%
Ordway Street	\$0	0.00%
Osborne Lane	\$18,870	0.13%
Ossabaw Drive	\$0	0.00%
Otter Trail	\$0	0.00%
Oval Hesson Lane	\$0	0.00%
Oxford Hall Avenue	\$0	0.00%
Palm Court	\$15,000	0.10%
Palmetto Drive	\$0	0.00%
Palomar Drive	\$0	0.00%
Pantera Drive	\$0	0.00%
Paper Bark Court	\$0	0.00%
Park Circle	\$0	0.00%
Parkwood Drive	\$0	0.00%
Passage Drive	\$0	0.00%
Pavilion Place	\$0	0.00%
Pearwick Court	\$0	0.00%
Pebblecreek Lane	\$0	0.00%
Pender Court	\$0	0.00%
Pendleton Boulevard	\$400	0.00%
Pennington Drive	\$15,625	0.11%
Pepper Branch Drive	\$0	0.00%
Perlino Drive	\$0	0.00%
Pheasant Run Trail	\$0	0.00%
Piccadilly Drive	\$0	0.00%
Pinweed Place	\$0	0.00%
Pisa Circle	\$0	0.00%
Pitchers Lane	\$0	0.00%
Pitts Lane	\$108,300	0.75%
Power Avenue	\$22,500	0.16%

ESTIMATED REMEDIATION COSTS FOR SIDEWALK BARRIERS SUBCLASSES

Street	Sidewalk Barriers Costs By Subclass	Barrier %%%
Prater Court	\$0	0.00%
Prescott Court	\$0	0.00%
Presley Drive	\$4,750	0.03%
Prestwick Drive	\$100	0.00%
Pretoria Run	\$0	0.00%
Prickly Pine Place	\$0	0.00%
Princeton Lane	\$0	0.00%
Princeton Oaks Lane	\$0	0.00%
Promise Way	\$0	0.00%
Puckett Creek Crossing	\$0	0.00%
Quail Chase Cove Crossing	\$0	0.00%
Quest Avenue Crossing	\$0	0.00%
Rambush Drive Crossing	\$0	0.00%
Rampart Lane Crossing	\$0	0.00%
Reagan Drive Crossing	\$625	0.00%
Redbank Lane Crossing	\$0	0.00%
Reedwood Drive Crossing	\$0	0.00%
Regency Park Drive Crossing	\$45,450	0.31%
Regenwood Drive Crossing	\$0	0.00%
Regiment Place Crossing	\$0	0.00%
Rice Street Crossing	\$5,500	0.04%
Richard Road	\$100	0.00%
Richardson Avenue	\$44,300	0.31%
Rideout Lane	\$29,750	0.21%
Ridge Drive	\$5,000	0.03%
Ridgely Road	\$134,500	0.93%
Ridings Court	\$0	0.00%
Rift Lane	\$0	0.00%
River Downs Boulevard	\$0	0.00%
River Rock Boulevard	\$200	0.00%
Robert James Drive	\$0	0.00%
Robert Rose Drive	\$76,350	0.53%
Roberts Street	\$50	0.00%
Robinwood Drive	\$0	0.00%
Rockcastle Drive	\$0	0.00%
Rocking Horse Lane	\$0	0.00%
Rolling Creek Drive	\$0	0.00%
Ronald Drive	\$625	0.00%
Rosebud Court	\$0	0.00%
Rosegold Court	\$0	0.00%
Round Drive	\$0	0.00%
Roxburghe Court	\$0	0.00%
Roxbury Court	\$0	0.00%
Roxbury Drive	\$350	0.00%
Roxie Court	\$0	0.00%
Rubicon Drive	\$0	0.00%

ESTIMATED REMEDIATION COSTS FOR SIDEWALK BARRIERS SUBCLASSES

Street	Sidewalk Barriers Costs By Subclass	Barrier %%%
Rucker Lane	\$2,100	0.01%
Ruland Place	\$0	0.00%
Runnymede Drive	\$0	0.00%
Sabin Court	\$0	0.00%
Saddlebrook Drive	\$10,350	0.07%
Sagewood Court	\$0	0.00%
Salem Cove Lane	\$0	0.00%
Salem Creek Drive	\$0	0.00%
Salem Glen Crossing	\$0	0.00%
Salem Highway	\$5,950	0.04%
Sam Walton Drive	\$8,000	0.06%
Samsonite Boulevard	\$0	0.00%
Sandstone Circle	\$0	0.00%
Santana Street	\$0	0.00%
Sapphire Drive	\$0	0.00%
Saratoga Drive	\$11,250	0.08%
Saratoga Drive / Clarence Court	\$3,750	0.03%
Satinwood Drive	\$16,250	0.11%
Savannah Ridge Drive	\$0	0.00%
Sawmill Street	\$0	0.00%
Sawtooth Court	\$0	0.00%
Scarlett Drive	\$0	0.00%
Schoolside Street	\$19,250	0.13%
Schroer Drive	\$2,000	0.01%
Scotchase Circle	\$0	0.00%
Scottish Drive	\$0	0.00%
SE Broad Street	\$1,039,000	7.18%
Seascape Lane	\$0	0.00%
Second Avenue	\$24,825	0.17%
Sergio Avenue	\$200	0.00%
Sewanee Place	\$0	0.00%
Seward Crossing Boulevard	\$0	0.00%
Shade Court	\$0	0.00%
Shady Forest Drive	\$0	0.00%
Shady Glen Circle	\$0	0.00%
Shady Grove Drive	\$100	0.00%
Shafer Drive	\$0	0.00%
Shagbark Trail	\$17,000	0.12%
Shawnee Drive	\$23,500	0.16%
Shellsford Circle	\$0	0.00%
Sherrington Road	\$0	0.00%
Shoteka Drive	\$0	0.00%
Siegel Road	\$54,000	0.37%
Silohill Lane	\$0	0.00%
Silver Springs Court	\$0	0.00%
Slater Drive	\$0	0.00%

ESTIMATED REMEDIATION COSTS FOR SIDEWALK BARRIERS SUBCLASSES

Street	Sidewalk Barriers Costs By Subclass	Barrier %%%
Sloan Street	\$0	0.00%
Smith Street	\$18,000	0.12%
Smitty Drive	\$200	0.00%
Sorrell Court	\$0	0.00%
Sorrell Drive	\$0	0.00%
South Academy Street	\$68,150	0.47%
South Baird Lane	\$0	0.00%
South Bilbro Avenue	\$58,725	0.41%
South Church Street	\$707,900	4.90%
South Front Street	\$78,000	0.54%
South Frontage Road	\$0	0.00%
South Hancock Street	\$60,300	0.42%
South Highland Avenue	\$35,500	0.25%
South Maney Avenue	\$821,700	5.68%
South Maple Street	\$189,625	1.31%
South Public Square	\$160,000	1.11%
South Rutherford Boulevard	\$109,400	0.76%
South Spring Street	\$9,550	0.07%
South University Street	\$59,050	0.41%
South Walnut Street	\$108,250	0.75%
Southbend Drive	\$0	0.00%
Southcampus Drive	\$0	0.00%
Southgate Boulevard	\$0	0.00%
Southpointe Court	\$0	0.00%
Southpointe Way	\$0	0.00%
Splash Place	\$0	0.00%
Spotts Wood Circle	\$0	0.00%
Spring Cove Drive	\$0	0.00%
Spruce Court	\$5,000	0.03%
St Andrews Drive	\$204,525	1.41%
St Clair Street	\$10,925	0.08%
St Ives Court	\$0	0.00%
St Ives Drive	\$650	0.00%
St Johns Drive	\$3,000	0.02%
St Patrick Court	\$0	0.00%
Stanford Court	\$0	0.00%
Stark Street	\$0	0.00%
Starnes Court	\$0	0.00%
Starnes Drive	\$0	0.00%
Sterlingshire Drive	\$0	0.00%
Stetson Court	\$0	0.00%
Stockard Street	\$0	0.00%
Stockwell Drive	\$0	0.00%
Stone Mill Circle	\$0	0.00%
Stonehedge Drive	\$0	0.00%
Stovers Glen	\$0	0.00%

ESTIMATED REMEDIATION COSTS FOR SIDEWALK BARRIERS SUBCLASSES

Street	Sidewalk Barriers Costs By Subclass	Barrier %%%
Stow Crossing	\$0	0.00%
Stratford Hall Circle	\$0	0.00%
Strickland Drive	\$0	0.00%
Sulphur Springs Road	\$134,000	0.93%
Sun King Court	\$0	0.00%
Sunland Court	\$1,250	0.01%
Sunray Drive	\$0	0.00%
Sunset Avenue	\$19,100	0.13%
Swanholme Drive	\$0	0.00%
Swanson Lane	\$0	0.00%
Sweetbriar Avenue	\$0	0.00%
Sydney Place	\$0	0.00%
Tamarac Drive	\$0	0.00%
Tanglefoot Cove	\$12,500	0.09%
Tara Trace	\$0	0.00%
Tasha Lane	\$0	0.00%
Teaside Lane	\$0	0.00%
Telford Lane	\$0	0.00%
Tellyman Avenue	\$0	0.00%
Teresa Lane	\$0	0.00%
Terragreen Court	\$0	0.00%
Thad Court	\$0	0.00%
Tiberius Way	\$0	0.00%
Ticonderoga Avenue	\$0	0.00%
Tiffany Court	\$100	0.00%
Timber Creek Drive	\$0	0.00%
Tin Cup Drive	\$0	0.00%
Titans Circle	\$0	0.00%
Tombee Court	\$0	0.00%
Tommy Martin Drive	\$0	0.00%
Topaz Drive	\$0	0.00%
Tortuga Court	\$0	0.00%
Tour Drive	\$0	0.00%
Trafalgar Court	\$0	0.00%
Trevino Court	\$0	0.00%
Trevor Trail	\$0	0.00%
Tricia Place	\$0	0.00%
Troon Lane	\$0	0.00%
Truth Way	\$0	0.00%
Tulip Tree Drive	\$0	0.00%
Tulu Court	\$0	0.00%
Turtle Trace	\$0	0.00%
Twin Oak Drive	\$0	0.00%
Twisted Oak Drive	\$14,375	0.10%
Tyne Avenue	\$100	0.00%
United Drive	\$0	0.00%

ESTIMATED REMEDIATION COSTS FOR SIDEWALK BARRIERS SUBCLASSES

Street	Sidewalk Barriers Costs By Subclass	Barrier %%%
Upperpoint Court	\$0	0.00%
Valleywood Cove	\$1,250	0.01%
Veranda Circle	\$0	0.00%
Veranda Place	\$0	0.00%
Veterans Parkway	\$66,425	0.46%
Victory Station Way	\$0	0.00%
Vicwood Drive	\$0	0.00%
Vijay Avenue	\$0	0.00%
Vintage Grove Parkway	\$0	0.00%
Vista Court	\$5,000	0.03%
Warmingfield Drive	\$0	0.00%
Warrior Drive	\$4,050	0.03%
Watercolor Lane	\$0	0.00%
Waters Edge Court	\$0	0.00%
Waywood Drive	\$0	0.00%
Webbs Retreat Lane	\$0	0.00%
Wellhurst Drive	\$0	0.00%
Wellington Place	\$3,750	0.03%
Wendelwood Drive	\$0	0.00%
West Burton Street	\$18,225	0.13%
West Chestnut Street	\$0	0.00%
West Clark Boulevard	\$0	0.00%
West College Street	\$255,400	1.77%
West Hayes Street	\$2,700	0.02%
West Lokey Avenue	\$12,000	0.08%
West Lytle Street	\$3,500	0.02%
West Main Street	\$715,325	4.95%
West Northfield Boulevard	\$333,875	2.31%
West Rutherford Boulevard	\$700	0.00%
West Thompson Lane	\$0	0.00%
West Vine Street	\$342,075	2.37%
Westhaven Drive	\$0	0.00%
Westlawn Boulevard	\$0	0.00%
Weston Boulevard	\$0	0.00%
Westwood Drive	\$34,050	0.24%
Wexford Drive	\$3,500	0.02%
Weybridge Drive	\$100	0.00%
Wheatley Cove	\$5,000	0.03%
White Boulevard	\$0	0.00%
Whitebud Lane	\$0	0.00%
Whitworth Cove	\$5,000	0.03%
Wilbur Street	\$0	0.00%
Wilhoit Court	\$0	0.00%
Will Drew Drive	\$0	0.00%
Williams Drive	\$0	0.00%
Willow Bay Lane	\$0	0.00%

ESTIMATED REMEDIATION COSTS FOR SIDEWALK BARRIERS SUBCLASSES

Street	Sidewalk Barriers Costs By Subclass	Barrier %%%
Willow Cove Drive	\$0	0.00%
Willowoak Trail	\$0	0.00%
Wilson Avenue	\$0	0.00%
Windemere Drive	\$39,850	0.28%
Windsong Place	\$0	0.00%
Winterberry Drive	\$37,000	0.26%
Wisp Court	\$0	0.00%
Woodline Drive	\$0	0.00%
Woodmore Drive	\$7,750	0.05%
Woodruff Court	\$0	0.00%
Wycheck Lane	\$0	0.00%
Wythrope Hall Drive	\$0	0.00%
Total:	\$14,461,165	\$14,461,165
%%%	100.00%	

The project schedule periods are distributed over fifteen years:

Projected Project Completion Schedule

- Period A January – December 2020
- Period B January – December 2021
- Period C January – December 2022
- Period D January – December 2023
- Period E January – December 2024
- Period F January – December 2025
- Period G January – December 2026
- Period H January – December 2027
- Period I January – December 2028
- Period J January – December 2029
- Period K January – December 2030
- Period L January – December 2031
- Period M January – December 2032
- Period N January – December 2033
- Period O January – December 2034

The City should schedule funding for budgeting remediation over a period of a suggested fifteen years to comply with the Title II requirements.

RESPONSIBLE INDIVIDUAL

The official responsible for the implementation of the City of Murfreesboro’s ADA Transition Plan for the pedestrian facilities in the public right-of-way is: Robert Holtz, 111 West Vine Street, Murfreesboro, TN 3713 615-893-3750. rholtz@murfreesborotn.gov

EXHIBIT B

ADA Transition/Barriers Removal Plan

for the

City of Murfreesboro , Tennessee

September 13, 2019

**Kline Swinney Associates
22 Middleton Street
Nashville, TN 37210
615.255.1854**

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Executive Summary

The City of Murfreesboro ADA Transition Plan Executive Summary was prepared by Kline Swinney Associates with the collaboration and assistance of City of Murfreesboro staff under the leadership of Robert Holtz and City staff. The Executive Summary provides overall findings and describes the focus of the study.

Purpose of the Evaluation

The purpose of this City of Murfreesboro Americans with Disabilities Act (ADA) Transition Plan is to document the results of the City of Murfreesboro's review of access to city sites, programs and services by individuals with disabilities in order to determine if any prevent access as required by the ADA. This report contains findings and recommendations based on the review during 2019.

Prior ADA Transition Plans

As required by Title II of the ADA, the City of Murfreesboro (City) conducted previous accessibility studies to identify physical and structural barriers that may be barriers for accessibility for individuals with disabilities. The current study conducted by Kline Swinney Associates (KSA) updates and/or augments the 2013 accessibility surveys and studies that were conducted previously.

Current ADA Transition Plan

To further the City's commitment to provide programs, services and activities in a nondiscriminatory manner for individuals with disabilities, the City decided to conduct an updated Americans with Disabilities Act (ADA), evaluation of city buildings and facilities, and to update transition/barrier removal plans of selected facilities. The ADA Transition Plan provides a current benchmark for removal of barriers efforts by the City and provides a framework for implementation of the plan addressed by the current findings.

Classification of the City of Murfreesboro

The City of Murfreesboro is classified as a "public entity" pursuant to Title II of the Americans with Disabilities Act, which applies to state and local governments. A public entity covered by Title II is defined as 1) Any State or local government; or 2) Any department, agency, special purpose City, or other instrumentality of a State or local government.

Title II is intended to apply to all programs, activities, and services provided or operated by State and local governments. Currently, section 504 of the Rehabilitation Act applies to programs or activities receiving Federal financial assistance.

Title II of the ADA covers programs, activities, and services of public entities. Title II is divided into two subtitles. This study focuses on subtitle A of Title II, which is implemented by the Department of Justice's Title II regulation. Subtitle B, covering public transportation, and the Department of Transportation's regulation implementing that subtitle, are not addressed in this portion of the study.

Subtitle A, the focus of the City of Murfreesboro self-evaluation, is intended to protect qualified individuals with disabilities from discrimination on the basis of disability in the services, programs, or activities of all State and local governments. It additionally extends the prohibition of discrimination on the basis of disability established by section 504 of the Rehabilitation Act of 1973, as amended, to all activities of State and local governments, including those that do not receive Federal financial assistance. By law, the Department of Justice's title II regulation adopts the general prohibitions of discrimination established under section 504, and incorporates specific prohibitions of discrimination from the ADA.

Focus of City of Murfreesboro ADA Transition Plan

The focus of the ADA Transition Plan (the study) is to identify physical barriers that may be discriminatory for persons with disabilities and identify methods and projected schedules (timelines) for barrier removal. Barriers that deny or limit access to programs, services or activities may be structural or nonstructural. Nonstructural barriers may be due to policies, practices or procedures that may inadvertently limit, segregate or discriminate against individuals with disabilities. Nonstructural barriers are not addressed in this portion of the study. Structural barriers may deny access due to the physical environment.

Structural barriers are referenced in detail for all city buildings and facilities by site and are contained in detail in individualized Transition/Barrier Removal reports of sites inspected, and are available from the ADA Coordinator and are found in the KSA individual site reports. It is important to note that some structural barriers may be addressed by using a programmatic methodology if they did not involve new construction or new remodeling and renovation. Findings, recommendations and other pertinent information from the study has been loaded onto CDs. Summary of each site is included in the CD as well as printed in 3 ring binders.

As required by Title II of the ADA comprehensive site inspections were conducted by KSA staff of all city buildings and facilities. The scope of the inspections included the recording of actual on-site measurements and photographs. Additional requirements of a transition plan completed by the City include identification of the noncompliant item or element, the proposed method to remove the barrier and the designated overall person responsible to implement the plan. The fourth and final requirement of a transition plan is the addition of the projected schedule for barrier removal or date. The City is currently completing the projected schedule for barrier removal.

Date of Transition Plan

The ADA self-evaluation and transition/barrier removal plans were prepared using information and input obtained during the summer of 2019.

Transition Plan Format

This Transition Plan is an on-going, dynamic document that will need periodic review and updating. In its' continuing efforts to maintain compliance, the City has several mechanisms in place to provide for an ongoing update of the Transition Plan. The City's designated ADA Coordinator and Section 504 Coordinator is empowered with oversight responsibility for implementation of the requirements of the ADA.

It is anticipated that additional comments and input may be received on the survey of facilities. The City should review methods to collect and incorporate additional applicable comments in the study or in the implementation plan.

Location of Transition Plan

The ADA Transition Plan will be maintained and made available for public inspection by the City's ADA Coordinator, Robert Holtz, Director of Building and Codes.

Designated ADA/504 Coordinator

Robert Holtz is designated as the ADA/504 Coordinator for the City. Requests for information from the ADA Coordinator can be sent by email, phone and mail. The ADA Coordinator currently does not have a direct TTY number. Information is available in alternate formats upon request.

Methodology for Transition Plan

A City of Murfreesboro staff member was designated to provide oversight representation and direction regarding the accessibility study. Robert Holtz, Director of Building and Codes, was designated as the City staff member to serve as the City contact for the study. The accessibility study included a review of physical barriers, however did not include a review of any potential or actual programmatic barriers.

Transition/Barrier Removal Plan

The term "transition plan" comes from the terminology in the 1990 Americans with Disabilities Act (ADA) that describes how public entities would be "transitioning" into compliance during the timelines of 1992 to 1995. The term barrier removal plan is used in addition to the term transition plan, as public entities are no longer transitioning into compliance during the three years set aside in the law. The transition/barrier removal plan identifies the noncompliant barrier that may deny access to goods and services, the proposed method to remove the barrier, the identity of the responsible person to oversee the implementation of the plan, and the projected schedule for barrier removal of "structural" barrier. The Self-evaluation, on the other hand focuses on programmatic barriers that may deny access to programs services and activities. The Self-evaluation is not included in this portion of the study. The two plans should work congruently to remove the structural and programmatic barriers.

Public entities, such as the City of Murfreesboro, are required to provide access to City programs, services and activities for the recipients of services. Thus, the City must provide access for individuals with disabilities and document areas of noncompliance. Documentation is incorporated into the plan as barriers are removed. Plans are updated, for example, as the City acquires additional properties, remodels facilities or removes properties from its inventory list.

Currently the City is upgrading City Hall to remove barriers in its efforts to comply with ADA. These upgrades include items such as installing automatic doors where it is structurally impractical to provide the 18" pull side clearance, identifying accessible routes within the Parking Garage from accessible parking spaces to elevators, and upgrading restrooms.

Findings

Services provided to City of Murfreesboro

Kline Swinney Associates performed a detailed field survey in accordance with the accessibility standards and regulations for the ADA Standards of most city owned sites. Most Fire Stations were removed from the list as these buildings are not open to the public. The Fire Department Headquarters was included and Fire Station #4 was included as the location where public tours and demonstrations occur.

Survey findings were recorded for use by the City to monitor, update and implement the transition plan, documenting the City's compliance effort progress. The surveys identify all city structural barriers to access and include recommended methods for removing the barriers.

City of Murfreesboro is in the process of updating the transition plan using KSA's summary findings to project dates of barrier removal.

The findings and recommendations for the City buildings and facilities inspected are contained in the report attached. Detailed survey forms are available in electronic format. The summary reports for each facility provides the City with a tool to update its plan, document progress, estimate costs and schedule barrier removal. The budget cost numbers provided in the report are for the purposes of prioritizing the barriers removal. These budget numbers were not obtained from a detailed barriers removal plans. The budget numbers are merely a rough order of magnitude guessitmatation.

The City's Building and Code Department insures that as new buildings are acquired and then renovated for their use that they will bring those buildings or portions being renovated into compliance with the ADA. The City has been and will continue to budget CIP funds specifically for barrier removal in existing buildings with a plan of brining all existing building into compliance within 10 to 15 years.

Recommendations

The City should continue to utilize the results of the study to prioritize and remove barriers that have been identified in the study. The City's Building and Codes Department plans to use the detailed and comprehensive results of the study to update and maintain a current plan, budget funds, schedule, implement, document, and monitor barrier removal activities.

The City should develop internal oversight procedures and methods to monitor new construction to verify that the work completed is compliant with accessibility standards.

Funds are being allocated for ADA projects and removal of ADA barriers to provide accessibility in accordance with the projected barrier removal schedule.

Notice to the Public of the Transition Plan

Following the review of the draft plan by the City, the City should plan to provide opportunities for input into the draft plan. Methods to meet the requirements of the public participation portion of the ADA should be discussed and may include notice and posting that an update to the study has been completed and inviting members of the public, staff and stakeholders to provide input into the plan and to assist with the prioritization. As the ADA requires opportunities for input and access to the draft plan to provide comments, the City plans to post notice of the updated study and invite comments. The ADA Coordinator

and designated staff will afford opportunities for input by discussing the results, providing access to pertinent portions of the plan and making accommodations for alternate accessible formats to increase access to the plan. The current draft plan is comprehensive and has over 1,000 pages, which would be cumbersome for the public to access. As the ADA requires opportunities for public input and does not require the posting of the actual plan, the City will provide access to the portion or portions of the plan requested for public input.

Accommodations to Access Programs, Services and Activities

The ADA prohibits public entities from excluding persons with disabilities from programs, activities or services offered by the public entity. The law allows a public entity to use both structural and nonstructural methods to achieve accessibility to programs, services and activities (28 CFR §35.150(a)(1); (b)(1)).

The City should have a process and procedure to provide accommodations to afford individuals with disabilities the opportunity to have equal access to programs, services and activities.

Planning and Budgeting for Accessibility

There is not a specific requirement in the ADA for planning and budgeting for barrier removal. There is a requirement for public entities to incorporate a projected schedule for barrier removal into the transition/barrier Removal plan. A City that is budgeting or seeking funds to use for ADA barrier removal and to improve access to programs, services and activities shows intent to implement the barrier removal/transition plan.

Findings

There is evidence that the City of Murfreesboro is incorporating the removal of barriers to accessibility on an ongoing basis and plans to remove additional barriers to City programs, services and activities.

Recommendations

The City should develop a method to maintain an ongoing barrier removal implementation plan and document the City's progress, initiatives and funds expended. The City has prioritized barriers removal into two major categories, Site Work and Building Work. From there, they have prioritized barriers removal as per ADA with access from site arrival points to building entrance(s) as the first priority, access to goods and services as the second priority, access to restroom facilities as the third priority and finally access to other items such as drinking fountains and fire alarm systems.

It is recommended that the City contract for an independent review of plans, remodeling efforts and new construction for accessibility requirements for the Americans with Disabilities Act Standard. It is important and required that the accessibility barrier removal efforts meet federal and state accessibility codes.

The ADA Coordinator, or designated staff, should be empowered with the authority to make recommendations and monitor the current City of Murfreesboro ADA Transition Plan.

Summary of Findings and Recommendations

The process of conducting the study to update the City's ADA and Section 504 plan demonstrate not only the commitment by the City to provide access to City buildings, facilities, programs, services and activities, but the overall compliance by the City to meet the requirements of the ADA and Section 504 of the Rehabilitation Act.

Noncompliant findings regarding physical barriers that may deny access for persons with disabilities are documented in the updated City ADA Transition/Barrier Removal Plan.