

Appendix I

Summary of 30-Day Public Comment in the final draft of the ADA Transition Plan

Upon the completion of a final draft of the King County Metro ADA Title II Transition Plan, Metro followed best practices and released an open draft for a final review and a public comment period before its official adoption. Metro released the full Transition Plan draft document to the public as well as a summary of the transition plan recommendations which were translated into 11 languages.

The plan was posted online on December 9th, 2024, and communications were sent out through the Metro blog, social media, and community contacts. After a 30-day comment period, Metro gathered 12 responses. Metro has reviewed all responses and made applicable edits to the plan as well as reviewed, identified major themes, and summarized comments according to those themes. The comments provided are consistent with much of the feedback Metro received from the public during the engagement phase of the transition plan in 2023 (See Section 2.3. All relevant public feedback and recommendations are considered critical to guiding Metro in the implementation of the transition Plan.

We thank every member of the public who has engaged with Metro either during the community engagement meetings, surveys, and public comment on the final draft.

Public Comment Themes and Summary:

“Riders with less mobility or other disabilities are like the canaries in the mine. Transit that works well for them works well for all of us. Transit cannot be seamless; it has seams of distance (walking or rolling), time (waiting), information (complexity networks and fare structure), and financial (fare). All the seams of transit are more difficult for ADA riders or others with reduced mobility.” -Comment provided by member of the public

The comment above clearly spotlights the need for universal access and targeted universalism approached that focus on where the needs are greatest for the best outcomes for the community. Metro now has an ADA and Universal Access Program that focuses on the “big picture” of equity and accessibility beyond a focus of meeting specific compliance requirements.

Several themes have been identified that align with feedback and recommendations already provided from the disability community during the development of the Transition Plan. These themes include:

- ▶ **Transit Stop Amenities:** Feedback was provided about having more bus shelters and seats at bus stops, especially seats for bus stops that are located on hills.
 - **Onboard Accessibility:** feedback was provided that bus drivers need to improve pulling up to stops and deploying lifts to align with curb and to utilize lifts for better ease and safety for boarding riders using mobility devices.
- ▶ **Transit Facilities:** Comments addressed issues for people with disabilities who rely on elevators to access transit platforms. The feedback included issues that riders

with disabilities encounter with elevators at transit facilities that are often out of service or having to utilize elevators in unsanitary conditions.

- ▶ **Driver Training:** Several commentors requested more driver training including topics such as, pulling up to the curb and ramp deployment, effectively securing wheelchairs, having awareness and sensitivity for people without visible or apparent disabilities, and encouraging priority seating areas for people with disabilities and elders.
- ▶ **Navigational clarity:** Comments included better wayfinding signage and tools with more specifics on bus stop location such as which side of the street or intersection a stop is on and the direction of the bus. The feedback indicates, with more clarity, riders will have to travel less trying to find bus stops which can be difficult for many customers with disabilities.
- ▶ **Infrastructure:** Commentors cited inaccessible sidewalk conditions and the need for more seating and amenities at transit stops. Comment was also provided reporting difficulty and additional burden on disabled riders with transfers and navigation of transit centers which can require having to walk or roll over long distances which can be difficult for many people with disabilities.
- ▶ **Comments of support:** There were several comments that were supportive and commented Metro's efforts to improve accessibility and were supportive of the overall Transition Plan.

New themes or concepts that emerged from comments:

- ▶ **Priority Seating Areas on Buses:** Several Commentors specifically addresses issues with the disability priority seating area at the front section of the bus. One commentor addressed people with invisible or non-apparent disabilities who may have access needs where they benefit from sitting in the priority seating area to be nearer the driver. The commentor often faced with the assumption that, because they do not have a physical disability, that they should not be allowed to sit in the priority area. Other commentors with physical disabilities commented that people do not respect the importance of the priority seating area for people with disabilities and do not move readily for those who require the priority seating area. All commentors who addressed this theme specifically mentioned the need to clarify these issues with drivers and provide better training on how to encourage riders to respect the importance of the priority seating area for riders with various accessibility needs and disabilities.
- ▶ **PROWAG and ADA Technical Language and Policy:** One commentor provided detailed feedback on updating more specific language about Public Right of Way Accessibility Guidelines (PROWAG) and assurance that Metro has adopted the most recent versions of the policy. Metro has adopted the 2023 updated PROWAG policy enforceable by the ADA and has adjusted language in Section 1.3 of the transition plan to reflect this. Metro will also continue to stay up to date with policy guidelines and legal requirements of the ADA and adjust our strategies and standards accordingly.