



*King County Metro*

**Americans with  
Disabilities Act (ADA)  
Transition Plan**

**August 2024**



King County Metro Transit (Metro) prepared this Transition Plan with the assistance of the Consultant Team led by Kimley-Horn and Associates, Inc. along with its subcontractor team, Accessology Too, LLC, and Stepherson and Associates Communications.

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## ABBREVIATIONS

**ADA** – Americans with Disabilities Act  
**BIPOC** – Black, Indigenous, or People of Color  
**CFR** – Code of Federal Regulations  
**CIP** – Capital Improvement Program  
**CTA** – Chicago Transit Authority  
**DOJ** – United States Department of Justice  
**DOT** – United States Department of Transportation  
**EEO** – Equal Employment Opportunity  
**EEOC** – Equal Employment Opportunity Commission  
**EITA** – Electronic and Information Technology Accessibility  
**FHWA** – Federal Highway Administration  
**LEP** – Limited English Proficiency  
**MEF** – Maximum Extent Feasible  
**MUTCD** – Manual on Uniform Traffic Control Devices  
**OBS** – On-Board System  
**OERSJ** – King County Office of Equity, Racial and Social Justice  
**PA** – Public Address  
**PROWAG** – Proposed Public Rights-of-Way Accessibility Guidelines  
**PSA** – Programs, Services, and Activities  
**WAVE** – Web Accessibility Evaluation Tool

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## EXECUTIVE SUMMARY

King County Metro Transit (Metro) is committed to providing safe, reliable, and accessible public transportation. Metro's Strategic Plan envisions a mobility system that advances equity by serving underserved communities, including persons with disabilities.

Metro offers a wide range of mobility services including bus, vanpool, water taxi, and flexible services. It also operates the Seattle Streetcar, Sound Transit Link light rail, and Sound Transit Express bus services. For people with disabilities who cannot use Metro's regular buses, Metro offers Access paratransit service and additional service for seniors and disabled people via the Community Access Transportation program.

## ADA TRANSITION PLAN PURPOSE

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

- I. Employment
- II. State and local government services
- III. Public accommodations
- IV. Telecommunications
- V. Miscellaneous provisions

Title II of the ADA pertains to the programs, services, and activities of public entities, such as Metro. Title II of the ADA states 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).

To comply with Title II regulations, Metro assessed the accessibility of its public-facing programs, services, and activities, along with high-use pedestrian facilities such as parking garages, transit centers, park-and-ride locations, and standalone transit stops. Based on this evaluation, a Core Team represented by the divisions mentioned in Chapter 3, has developed this Transition Plan that outlines how Metro will ensure that all current and future programs, services, activities, and facilities are accessible to everyone.

The purpose of this Americans with Disabilities Act (ADA) Transition Plan is to provide an overview of actions taken by King County Metro (Metro) to ensure ADA conformity. Additionally, it creates a roadmap for Metro to keep its ADA Transition Plan up-to-date. The prioritization methodology used for evaluating and implementing improvements, as outlined in [Section 4.3](#), is based on the 2010 ADA Standards, the 2006 United States Department of Transportation (DOT) ADA Standards for Transportation Facilities, the 2011 Proposed Public Rights-of-Way Accessibility Guidelines (PROWAG), and the applicable ADA Standards at the time of construction of a facility (as described in [Section 1.5](#)). This document contains details of Metro's approach to developing and maintaining its ADA Transition Plan.

This document provides an overview of the ADA and offers Metro guidance on improving public accessibility based on recommendations from the Federal Highway Administration (FHWA) and the U.S. Department of Justice (DOJ).

## **METRO'S APPROACH FOR THE DEVELOPMENT OF THE ADA TRANSITION PLAN**

The Consultant Team conducted a thorough accessibility review of Metro programs, services, activities, policies, and high-use transit facilities, including parking garages, transit centers, park-and-rides, and standalone transit stops.

The Consultant Team, the ADA Services Administrator, and the contributing divisions of Metro are responsible for developing the ADA Transition Plan report and program. This group is referred to as the "Core Team" throughout the report.

- ▶ Metro staff and members of the Consultant Team adopted a community engagement strategy centered on equity that informed and consulted with community members. Engagement methods included:
  - ▷ Informational sessions and presentations
  - ▷ Informational interviews
  - ▷ Focus groups
  - ▷ An online open house and survey.
- ▶ The team reviewed Metro's previous accessibility activities and efforts.
- ▶ The team reviewed accessibility-related Metro policies, procedures, and related accessibility documents.
- ▶ The team reviewed the accessibility of Metro's programs, services, and activities.
- ▶ The team interviewed key department personnel.
- ▶ The team interviewed similar large-sized transit agencies nationwide to identify and document accessibility-related best practices for Metro to consider for implementation.
- ▶ The team conducted onsite accessibility surveys of a limited number of high-use Metro parking garages, transit centers, park-and-ride locations, and standalone transit stops with "limited accessibility" or "no lift" designations.

## **SELF-EVALUATION AND FACILITY ASSESSMENT FINDINGS**

Metro is a large transit agency that serves 39 jurisdictions and unincorporated areas in King County. It consists of multiple divisions and contracts with numerous local government agencies and contract service providers to provide high quality mobility services to its users. After evaluating Metro's programs, services, activities, and facilities, key themes have emerged regarding the accessibility status of Metro services. A summary of the key observations from this review is included below.

## **DESIGNATION OF THE ADA COORDINATOR**

- ▶ As required as part of the development of an ADA Transition Plan under Title II of the Americans with Disabilities Act, Metro has designated a Title II ADA Coordinator. Metro's ADA Services Administrator serves as the agency's Title II ADA Coordinator, providing accessibility oversight of all Metro services, programs, vehicles, transportation facilities, and construction projects. Dion Graham currently holds this position. His contact information is available on Metro's website and in selected publications.

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## CURRENT POLICIES AND PROCEDURES

- ▶ Sustained equity and accessible mobility programs and services are included in Metro's Strategic Plan.
- ▶ Metro should aim to ensure consistent communication, policies, and procedures for all mobility services.
  - ▷ A detailed review of policies and recommended updates to ensure consistency across the Sections and Divisions within Metro is included in [Section 3.3](#).

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## PUBLIC NOTICE OF RIGHTS

- ▶ Metro's notice of the rights available to individuals with disabilities is compliant and accessible in multiple formats and languages.

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## GRIEVANCE POLICY AND PROCEDURES

- ▶ Metro's public Grievance Policy, Procedure, and Form with appeal process was reviewed and updated in August 2023.
- ▶ The Grievance Policy, Procedure, and Form should be accessible on Metro's website, and information on obtaining the form in alternative formats and languages should be provided.
- ▶ Metro should consider posting the form online on its website.

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## EFFECTIVE COMMUNICATIONS

- ▶ Metro's Customer Communications Division addresses procedures that provide for the prompt and equitable resolution of ADA complaints.
- ▶ Metro's Communication Division is responsible for effective communication across various platforms, including face-to-face interactions, multimedia, websites, telecommunications, written materials, and emergency communications.

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## ACCESS TO PROGRAMS, SERVICES, AND ACTIVITIES

- The team observed no discriminatory practices that hindered access to programs, services, and activities.
- ▶ Metro has created two committees, the Access Paratransit Advisory Committee (APAC) and the Transit Advisory Committee (TAC), to provide advice and recommendations to Metro, the King County Executive Team, and the King County Council regarding transit issues and policies related to ensuring equal access to public transportation for individuals with disabilities.
- ▶ Metro's Access Paratransit program provides transportation services for individuals with disabilities who cannot use fixed-route buses.

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## OPPORTUNITIES FOR PUBLIC INPUT

- ▶ The staff of Metro Customer Communications and members of the Consultant Team collaborated to design and execute an equitable community engagement strategy, including: Informational sessions and presentations to current
  - Metro Advisory Committees
    - Access Paratransit Advisory Committee (APAC)
    - Transit Advisory Commission (TAC)
    - King County Council Transit Interbranch
    - Equity Cabinet
  - Mobility Interest Groups
    - Seattle Disability Commission
    - Eastside Easy Rider Collab
    - Snoqualmie Valley Mobility Coalition
    - King County Disability Equity Network
- ▶ Informational interviews with three (3) groups with knowledge of ADA transit accessibility issues and concerns
  - Disability Rights Washington
  - King County Office of Equity, Racial, and Social Justice
  - Sound Transit
- ▶ Focus groups with 13 different groups representing a range of people with disabilities, including BIPOC individuals, older adults, and transit-dependent individuals
- ▶ An online open house and survey (<https://publicinput.com/kc-metro-ada-plan#1>), available from Sept. 18 – Oct. 15, 2023.
  - Approximately 300 participants took the survey, which was published online at King County's Digital Engagement Hub.
- ▶ Feedback obtained through various engagement methods will be utilized in identifying and prioritizing improvements that Metro can make to enhance accessibility for users of Metro programs, services, and activities.

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## ACCESS PARATRANSIT (CONTRACTED / ON DEMAND SERVICES)

- ▶ The Consultant Team found no discriminatory practices in the contractor and contracted services selection process for Metro.
- ▶ The team found inconsistencies between the policies and practices of the contracted service providers and Metro.

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## STAFF TRAINING

- ▶ Metro should implement consistent policies and procedures for ongoing ADA conformance training and interdepartmental collaboration.
- ▶ To promote accessibility and ensure conformance with ADA regulations, Metro should mandate that all contracted service personnel receive regular training on ADA

conformance and accessibility standards. Metro should review and approve the training content.

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## **FACILITY ACCESSIBILITY**

- ▶ A selection of Metro facilities, including six (6) parking garages serving transit centers or park-and-ride locations, 31 stand-alone transit stops, and 14 transit center or park-and-ride locations were selected to be evaluated for conformance with ADA standards and best practices. The facilities were selected due to their lack of existing accessible elements, high level of pedestrian activity, and their proximity to pedestrian traffic generators.
- ▶ Nonconforming findings include:
  - ▷ Excessive slopes at boarding and alighting areas for transit stops and along the associated accessible routes
  - ▷ Level changes greater than .25 inch at boarding and alighting area connections to curbs for transit stops and along the associated accessible routes
  - ▷ Inadequate accessible parking spaces
  - ▷ Non-conforming accessible parking spaces
    - Excessive slopes
    - Level changes > .25 inch
- ▶ A list of potential solutions, along with planning-level construction cost projections for addressing any nonconforming conditions, can be found in the reports for evaluated facilities provided in [Appendix G](#).
- ▶ Metro divisions responsible for projects, including ADA access improvements, will collaborate to identify projects, funding, and timelines. The Capital Improvement Program (CIP) process will provide the mechanism for identifying project budgets and schedules.

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## **NEXT STEPS**

Metro will begin internal coordination to address the programmatic and physical barriers identified in the Transition Plan. Major actions anticipated to be completed toward implementation of the observations of this Transition Plan are described below.

The Transition Plan will be regularly updated to track the status of Metro programs, services, activities, and facilities and to document efforts to achieve conformance with ADA requirements.

- ▶ Suggested steps for advancing Metro's agency-wide Transition Plan work include:
  - ▷ Create a new project manager position in the Metro General Manager's Office responsible for the planning and implementation of the legal and civil rights recommendations of the Plan. These recommendations include:
    - Create a uniform accessibility policy for all Metro divisions and contracted service providers across the entire system.
    - Create agency-wide and division or section-specific ADA Training to ensure staff know their responsibilities regarding ADA conformance.
    - Review current resources, roles, and responsibilities regarding ADA accessibility.



- ▷ Include ADA policy and program in the onboarding of new staff.
- ▷ Review staffing needs to review partner projects for ADA projects for ADA conformance.
- ▷ Regularly engage the disability community for feedback on plans to reduce barriers to programs and services.
- ▷ Ensure that a comprehensive analysis is conducted for Metro's website, including all interactive components and applications.
- ▷ Ensure metrics are developed and shared in a system-wide process for implementing long-term accessibility barrier removal based on collected data.
- ▷ Decide which divisions are required to track ADA-related issues and the process for sharing information between divisions to ensure consistency.
- ▷ Transform the contracted services program into a collaborative partnership with Metro, sharing policies and practices and overseeing the training program and overall success.
  - Develop better policies and relationships with contract service providers for consistent service across the system.
- ▷ Appoint an ADA Team consisting of representatives from the all divisions to develop a multi-year plan to remove physical barriers at Metro bus stops and facilities. This work will include:
  - Within each biennial budget, assess accessibility priorities for facilities and consider including projects in the Metro Transit Capital Improvements list.
  - Ensure all facilities are reviewed, and a baseline is established for future projects to succeed.
    - Develop a system to assess the accessibility of all bus stops, park-and-ride facilities, transit centers, and related amenities. This system should prioritize the necessary changes to ensure conformance with the Department of Justice's transition plan process. By ensuring these ongoing evaluations, Metro can keep the Transition Plan up-to-date and meet all requirements.
  - Ensure that accessibility requirements are incorporated into all planning and construction projects by conducting thorough reviews.
    - Confirm engineer design support with Metro Plans Review (ADA/504) team to review plans from jurisdictions and developers.
    - Provide additional standard comments regarding ADA design standards to reviews of plans from external partners.
    - Have the Office of Plans Review inform partners of these standard notes and requirements.
    - Provide confirmation of meeting ADA design guidelines at project inspection.
  - Integrate ADA accessibility and removal of barriers in all phases of projects.
  - Document Metro Transit policy on bus stop amenities.
- ▷ Improve coordination between the ADA Coordinator, the ADA Implementation Team, and the newly developed EEO Case Management Project. The goal is to

integrate ADA Title II and VI into the workflow, which will ensure consistency throughout the agency and facilitate sharing of data in reports and dashboards.

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## 1.0 INTRODUCTION



### 1.1 PURPOSE

The purpose of this Americans with Disabilities Act (ADA) Transition Plan is to provide an overview of the actions undertaken by King County Metro (Metro) to ensure ADA conformity and identify barriers. It defines Metro's process and responsibilities to periodically report, review, and update the plan. The prioritization methodology used for evaluating and implementing improvements, as outlined in [Section 4.3](#), is based on the 2010 ADA Standards, the 2006 United States Department of Transportation (DOT) ADA Standards for Transportation Facilities, the 2011 Proposed Public Rights-of-Way Accessibility Guidelines (PROWAG), and the applicable ADA Standards at the time of construction of a facility (as described in [Section 1.5](#)). This document contains details of Metro's approach to developing and maintaining its ADA Transition Plan.

This document provides an overview of the ADA and offers guidance to Metro on improving accessibility for the public based on recommendations from the Federal Highway Administration (FHWA) and the U.S. Department of Justice (DOJ).



### 1.2 LEGISLATIVE CONTEXT

The Americans with Disabilities Act (ADA) is a civil rights law that ensures equal opportunities for people with disabilities. It prohibits discrimination in various areas, including access to jobs, public accommodations, government services, public transportation, and telecommunications. Title II of the ADA mandates that public entities must provide equal access for individuals with disabilities to all programs, services, and activities.

Metro has recently conducted a thorough assessment of its programs, services, and activities (PSAs) to determine how much individuals with disabilities may be restricted from accessing them due to physical and programmatic barriers. These barriers are described in [Section 1.4](#) of the report. The accessibility standards and guidelines Metro used to identify these barriers are detailed in [Section 1.5](#).



### 1.3 ADA SELF-EVALUATION AND TRANSITION PLAN DEVELOPMENT REQUIREMENTS AND PROCESS

The Americans with Disabilities Act is divided into five sections. Metro is required to follow all the regulations of Title I in its employment practices; Title II in its policies, programs, and services; and any parts of Titles IV and V that apply to Metro in its programs, services, or facilities. Also, it must comply with all the requirements specified in the relevant ADA Standards, including the 2010 ADA Standards and the 2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG). Title III is related to Public Accommodations (and Commercial Facilities) and is not applicable in this context.

Title II has the broadest impact on Metro. 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 (1) person who is responsible for overseeing Title II conformance
- ▶ Development of a Transition Plan to schedule the removal of the barriers uncovered by the self-evaluation process. The Transition Plan will become a working document until all barriers have been identified and addressed.

This document outlines the process that was developed to evaluate Metro's PSAs and facilities. It also provides potential solutions to remove any programmatic barriers and presents a Transition Plan that will guide the necessary program and facility modifications continually. The aim of the ADA Transition Plan is to ensure that Metro's PSAs and facilities remain accessible to all customers, demonstrating Metro's ongoing commitment to providing equal access for everyone.

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### 1.3.1 METRO'S APPROACH TO DEVELOPING THE PLAN

Following the guidance of King County's Disability Equity Action Plan (dated June 30, 2021), Metro undertook the following responsibilities as part of the development of its ADA Transition Plan:

- ▶ Performed a Self-Evaluation of its services, policies, and practices
- ▶ Provided public notice about the ADA
- ▶ Established a grievance procedure
- ▶ Developed a Transition Plan since structural and physical changes are required for program accessibility.

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### METRO'S ADA TRANSITION PLAN STRUCTURE

- ▶ **Chapter 1** provides an overview of the ADA Transition Plan, including background, process, requirements, and Metro's approach to developing the plan
- ▶ **Chapter 2** provides details on the equity and social justice stakeholder engagement activities completed in support of the Transition Plan
- ▶ **Chapter 3** provides details on the Self-Evaluation of Metro's programs, services, and activities, including information on Metro's ADA Coordinator, ADA grievance process, and ADA public notice
- ▶ **Chapter 4** provides details on the facilities evaluated to date as part of Metro's ADA Transition Plan
- ▶ **Chapter 5** summarizes the estimated costs to remove barriers to access at the evaluated facilities, discusses funding opportunities, and defines Metro's next steps toward implementing the Transition Plan.
- ▶ **Chapter 6** lists next steps that Metro will be taking to improve accessibility.

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### METRO'S ADA SELF-EVALUATION AND TRANSITION PLAN APPROACH

To promote fairness and equal opportunities for people with disabilities and to provide them with access to all the programs, services, activities, and physical facilities, Metro adopted the Executives Liaison Model when developing this plan. This model is consistent with the King County Disability Access Policy under Section 22-2-2.35.



The liaison structure is an organizational model where executive departments appoint liaisons to collaborate on systemwide issues, coordinate with the King County Office of Equity, Racial and Social Justice (OERSJ) ADA Title II coordinator for countywide uniformity and conformance with ADA requirements, as well as for training and collaboration purposes.

On October 1, 2020, the Executive Directors of The Alliance of People with Disabilities and The Arc of King County submitted a letter, and an associated report entitled “Still Left Out After 30 Years of the ADA: King County is Failing the Disability Community” to King County leaders. The letter and report were signed by 38 organizations and over 100 community members and leaders in the disability community. The letter and report recommended actions for the County to consider and implement, which are reflected in this Transition Plan. The letter pointed out areas where the County was falling short in equitably serving people with disabilities, including:

- ▶ ADA conformance
- ▶ Accessibility
- ▶ Communications
- ▶ Disability Equity in Programs
- ▶ Inclusive Employment

In response to the community feedback, OERSJ staff developed a Disability Equity Action Plan in partnership with disability community members and advocacy groups such as the Disability Empowerment Center (formerly Alliance of People with Disabilities), the Arc of King County, the Northwest ADA Center, and the King County Disability Consortium.

The Disability Equity Action Plan, under PER 22-2-2, requires department liaisons to coordinate with the OERSJ’s Title II coordinator to ensure uniformity and conformance with ADA requirements. Metro’s ADA Services Administrator serves as the agency’s ADA/504 Coordinator and provides accessibility oversight of all Metro services, programs, vehicles, transportation facilities, and construction projects. This role assists in identifying and mitigating existing barriers that may impact full and equal access for individuals with disabilities. Complaints and comments from individuals with disabilities, or any persons representing an individual with a disability pertaining to facility accessibility, programs, transit operations services, and requests for Reasonable Modification involve the ADA Coordinator in determining trends and policy/procedural effectiveness.

The purpose of the Transition Plan is to provide the framework for achieving equal access to Metro’s PSAs through the removal of barriers to access within a reasonable timeframe. Metro’s leadership and staff believe that accommodating persons with disabilities is essential to good customer service, ensures the quality of life that Metro’s customers seek to enjoy, and guides future improvements. This plan has been prepared after carefully studying all of Metro’s ADA-specific programs, services, activities, and evaluating a select number of Metro facilities.

Metro will make reasonable modifications to PSAs when the requested modifications are necessary to avoid discrimination based on disability unless Metro can demonstrate that making the modifications will fundamentally alter the nature of the program, service, or activity. Metro will not charge individuals with disabilities to cover the cost involved in making PSAs accessible.

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## **METRO’S APPROACH TO EQUITY AND SOCIAL JUSTICE**

King County Metro has a strong emphasis on ensuring the representation of all community members, and this is shown through implementing practices focused on equity and social

justice. The County has prepared an Equity and Social Justice Strategic Plan that outlines key strategies to advance equity and social justice, including investing:

- ▶ Upstream and where needs are greatest
- ▶ In community partnerships
- ▶ In employees

The Equity and Social Justice Plan of the County outlines a systematic approach to promote equity and justice for all. The plan recommends implementing pro-equity policies, practices, and systems that will result in positive changes in the community. Similarly, King County Metro has developed its Strategic Plan for Public Transportation. Through the development of the ADA Transition Plan in combination with these existing plans, Metro's ultimate goal is to achieve equitable outcomes for individuals and families, regardless of their background or level of ability.

More information about King County's equity strategy is available on their website (<https://kingcounty.gov/en/legacy/elected/executive/equity-social-justice.aspx>).



## 1.4 DISABILITY EQUITY

Program accessibility means that, when viewed in its entirety, each program is readily accessible to and usable by individuals with disabilities. This includes individuals with mobility needs and those 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.

Metro recognizes the following as examples of elements that should be evaluated for barriers to accessibility:

### 1.4.1 PHYSICAL BARRIERS

- ▶ Transit stop boarding and alighting areas, amenities, and connections to the sidewalk
- ▶ Path of travel to, throughout, and between amenities and buildings
- ▶ Path of travel along sidewalk corridors within the public rights-of-way
- ▶ Access to pedestrian equipment at signalized intersections
- ▶ Parking
- ▶ Doors
- ▶ Elevators
- ▶ Service counters
- ▶ Restrooms
- ▶ Drinking fountains
- ▶ Public telephones
- ▶ Transit Vehicles

#### 1.4.2 PROGRAMMATIC BARRIERS

- ▶ Customer communication and interaction
- ▶ Participation opportunities for Metro-sponsored events
- ▶ Emergency notifications, alarms, and visible signals
- ▶ Building signage

#### 1.4.3 ONGOING ACCESSIBILITY IMPROVEMENTS

Metro PSAs and facilities evaluated during the Self-Evaluation will continue to be evaluated on an ongoing basis, and the ADA Transition Plan will be revised to account for changes that have been or will be completed since the initial Self-Evaluation. Additionally, the plan will be updated as additional physical facilities are evaluated for conformance with the ADA standards and guidelines. This plan will be posted on Metro's website for review and consideration by the public.

#### 1.4.4 REASONABLE MODIFICATION AND GRIEVANCE POLICIES

Metro's Reasonable Modification policy aims to provide fair and effective opportunities for individuals with disabilities to access public transportation services. Metro Transit recognizes that in order to have equally effective opportunities and benefits, individuals with disabilities may need reasonable modification to policies and procedures. Metro Transit will adhere to all applicable federal and state laws, regulations, and guidelines with respect to providing reasonable modifications, as necessary, to afford equal access to programs for persons with disabilities. It is important to note that federal accessibility requirements do not mandate any action that would impose an excessive financial or administrative burden on the public agency, create a hazardous condition for other individuals, or harm the historical significance of a property.

When deciding if a modification will place an excessive financial or administrative burden on a covered entity, certain factors must be considered. These factors include (i) the type and expense of the modification; (ii) the overall financial resources of the facility or facilities that are involved in providing the reasonable accommodation; the number of individuals employed at such facility; the effect on expenses and resources, or the impact otherwise of such accommodation upon the operation of the facility; (iii) the overall financial resources of the covered entity; the size of the business of a covered entity considering the number of its employees; the number, type, and location of its facilities; and (iv) the type of operation or operations of the covered entity, including the composition, structure, and functions of its workforce; the geographic separateness, administrative, or fiscal relationship of the facility or facilities in question to the covered entity.

To determine whether a change could harm or destroy the historical or cultural significance of a property or location, Metro will first check if the property is listed on the National Register of Historic Places or is designated as significant to the indigenous communities of King County. A search of the National Register of Historic Places NP Gallery Database (<https://npgallery.nps.gov/nrhp>) and the associated geodatabase (<https://irma.nps.gov/DataStore/Reference/Profile/2210280>) shows that 296 historical places are registered within King County.

In certain cases, as explained below, Metro is not legally obligated to make all its existing facilities accessible and usable to individuals with disabilities. However, Metro has a

responsibility to communicate and document its decision-making process if a proposed action would generate undue financial or administrative burden, create a hazardous condition for others, or threaten the historic significance of a property or location. If such burdens are demonstrated, Metro must either make accessibility improvements to the maximum extent feasible (MEF) or take other demonstrably less harmful actions to ensure that individuals with disabilities receive the benefits or services provided by Metro.



## **1.5 ADA STANDARDS AND GUIDELINES FOR FACILITY CONSTRUCTION AND ALTERATIONS**

Metro projects must comply with current ADA standards and guidelines, and accessibility conformance reviews should occur at multiple stages of development.

According to the 2010 ADA Standards described below, state and local government facilities are held to the accessibility standard that was in place at the time of construction.

- ▶ Any facility built before March 15, 2012, will need to have altered areas brought into conformance with the current standard when the alterations are made.
- ▶ All newly constructed or altered state and local government facilities must comply with the 2010 ADA Standards and Title II and Title III regulations if the start date for construction was on or after March 15, 2012.
  - ▷ Before that date, the 1991 Standards (without the elevator exemption), the Uniform Federal Accessibility Guidelines, or the 2010 ADA Standards may be used for such projects when the start of construction commences on or after September 15, 2010.

The most recent standards are the 2010 ADA Standards, which set the minimum requirements – both scoping and technical – for newly designed and constructed or altered state and local government facilities, public accommodations, and commercial facilities to be readily accessible to and usable by individuals with disabilities. These standards are effectuated from the 28 Code of Federal Regulations (CFR) 35.151 and the 2004 Americans with Disabilities Act Accessibility Guidelines (ADAAG). However, the FHWA and DOJ recommend using the public rights-of-way accessibility guidelines (PROWAG) for designing facilities within the public rights-of-way as a best practice. The Manual on Uniform Traffic Control Devices (MUTCD) is also incorporated by reference within the 2011 PROWAG.

Metro has officially adopted the 2023 final PROWAG as is now recognized as the new ADA enforceable standards to the US Department of Transportation, which means it is now a legally binding document for all Metro projects that fall within public rights-of-way. This applies regardless of whether the document has been adopted by the state or federal level. In areas that are not considered public rights-of-way, Metro facilities must comply with the 2010 ADA Standards.

The ADA Standards are issued by the DOJ and the U.S. Department of Transportation (DOT) and are applicable to new construction and modifications for facilities covered by the ADA.

- ▶ DOJ's 2010 ADA Standards apply to all facilities covered by the ADA, except public transportation facilities, which are subject to DOT's 2006 ADA Standards.
- ▶ DOT's 2006 ADA standards apply to facilities used by state and local governments to provide designated public transportation services, including bus stops and stations and rail stations.



- ▶ Both standards are similar and closely based on the Board's ADA Accessibility Guidelines (ADAAG). However, each contains a few unique provisions, which are noted in the standards edition posted on the U.S. Access Board website (<https://www.access-board.gov/ada/>).

The US Access Board issued the updated ADA and Architectural Barriers Act (ABA) Accessibility Guidelines as final in 2004. In 2006, DOT adopted new ADA Standards for transportation facilities based on the updated ADA and ABA Accessibility Guidelines (2006 DOT ADA Standards). In 2010, the DOJ adopted new ADA Standards under [Titles II](#) and [III](#) (PROWAG).

### **2010 ADA Standards**

The Department of Justice's revised regulations for [Titles II](#) and [III](#) of the Americans with Disabilities Act of 1990 (ADA) were published in the Federal Register on September 15, 2010. These regulations adopted revised, enforceable accessibility standards called the 2010 ADA Standards (available here: <https://www.ada.gov/law-and-regs/design-standards/2010-stds/>). On March 15, 2012, conformance with the 2010 ADA Standards was required for new construction and alterations under [Titles II](#) and [III](#). March 15, 2012 is also the conformance date for using the 2010 ADA Standards for program accessibility and barrier removal.

### **2006 DOT ADA Standards**

As stated by the US Access Board, DOT's ADA 2006 standards apply to facilities used by state and local governments to provide designated public transportation services, including bus stops and stations and rail stations. These standards are very similar to the 2010 ADA Standards and are closely based on the Board's ADA Accessibility Guidelines (ADAAG); however, they include unique provisions concerning:

- ▶ Location of Accessible Routes
- ▶ Detectable Warnings on Curb Ramps
- ▶ Bus Boarding and Alighting Areas
- ▶ Rail Stations and Platforms

These provisions are described in detail on the US Access Board's website ([ADA Accessibility Standards \(access-board.gov\)](https://www.access-board.gov/ada-standards/)).

### **PROWAG**

The U.S. Access Board recently published new guidelines under the ADA and the Architectural Barriers Act (ABA) that address access to sidewalks and streets, crosswalks, curb ramps, pedestrian signals, on-street parking, and other components of public rights-of-way. These guidelines also review shared-use paths, which are designed primarily for use by bicyclists and pedestrians for transportation and recreation purposes. The Accessibility Guidelines for Pedestrian Facilities in the Public Rights-of-Way (PROWAG) provide minimum guidelines for the accessibility of pedestrian facilities in the public rights-of-way. When these guidelines are adopted, with or without modifications, as accessibility standards in regulations issued by other federal agencies implementing the ADA, Section 504 of the Rehabilitation Act, and the ABA, conformance with those enforceable accessibility standards is mandatory. The U.S. Access Board published the final rule on August 8, 2023, and became effective on September 7, 2023. PROWAG is the recommended best practice by the U.S. Access Board and Federal Transit Administration (FTA) and can be considered the state of the practice that could be followed for areas not fully addressed by the 2010 ADA



Standards. More information about PROWAG can be found here: <https://www.access-board.gov/prowag/>.

### **MUTCD**

Traffic control devices shall be defined as all signs, signals, markings, and other devices used to regulate, warn, or guide traffic, placed on, over, or adjacent to a street, highway, pedestrian facility, bikeway, or private road open to public travel by authority of a public agency or official having jurisdiction, or, in the case of a private road, by authority of the private owner or private official having jurisdiction. The Manual on Uniform Traffic Control Devices is incorporated by reference in 23 CFR, Part 655, Subpart F, and shall be recognized as the national standard for all traffic control devices installed on any street, highway, bikeway, or private road open to public travel in accordance with 23 U.S.C. 109(d) and 402(a). The policies and procedures of the FHWA to obtain basic uniformity of traffic control devices shall be described in 23 CFR 655, Subpart F.



## **1.6 EXISTING METRO PROGRAMS THAT IMPLEMENT ADA UPGRADES**

Metro's focus is to provide full and equal access to all of its programs and services for all riders. This includes individuals with mobility needs and those with sensory and cognitive disabilities. One strategy used to better serve people with disabilities better is to encourage those who can use fixed route programs to use it and improve it enough so that it's possible for them to do so. While focusing on Metro's mobility framework and King County's Equity and Social Justice Strategic Plan, the plan will focus on current and pending projects to identify barriers related to customer travels from home to transit and apply resources needed to ensure continual improvements toward Metro's facilities and services.

Metro currently implements ADA conforming plans and designs through the following programs and activities:

### **Capital Program**

- ▶ Bus Stop Improvements
- ▶ Access to Transit
- ▶ Transit Hubs
- ▶ RapidRide
- ▶ Site and Paving Improvements
- ▶ Transit Facilities Improvements
- ▶ Transit Speed and Reliability
- ▶ ADA Van Procurement
- ▶ All capital improvement programs that require site development or building construction permits issued by local jurisdictions must also comply with the ADA.
- ▶ All designs presented for permitting new passenger-facing facilities or modifications to existing facilities are authorized by engineers and architects of record to conform with the applicable state, local, and federal laws, including ADA for site and building access considerations per 28 CFR Part 35.

### **Mobility Division**

- ▶ Equity impact reviews – Metro Service Guidelines
- ▶ Health through Housing Program
- ▶ Future of Paratransit Project
- ▶ Plans review of partner agency projects

**Operations Division**

- ▶ Operations Manual review
- ▶ ADA Customer Comments System
- ▶ Safety, Security, and Fare Enforcement (SaFE) Reform Initiative

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## 2.0 EQUITY AND SOCIAL JUSTICE STAKEHOLDER ENGAGEMENT



### 2.1 ENGAGEMENT OVERVIEW

To develop the ADA Transition Plan, Metro collaborated with the Consultant Team to execute a community engagement strategy that prioritized equity. This strategy focused on both informing and seeking input from key external stakeholders. (In the following sections of this chapter, Metro and the Consultant Team will be referred to as the Engagement Team.)

Community engagement during the development of the ADA Transition Plan was vital to understanding the needs of the community served by King County Metro's transportation services, especially regarding making its facilities, programs, and services accessible for people with disabilities.

The purpose of the ADA Transition Plan community engagement was to:

- ▶ Deepen Metro's understanding of accessibility and the barriers that people with disabilities face when trying to use Metro's services
- ▶ Ensure that Metro's policies, procedures, and practices are inclusive and accessible for people with disabilities
- ▶ Nurture positive relationships between Metro and community members with disabilities
- ▶ Build public support for future Metro decisions and actions



### 2.2 ENGAGEMENT ACTIVITIES

The Engagement Team employed a range of inclusive engagement tools and methods and focused on engaging people who live with disabilities, along with other key audiences and groups that advocate on their behalf. Through this work, the Engagement Team fostered meaningful opportunities for people in the disability community to express their needs, concerns, and interests. Outlined in further detail below, the insights, ideas, and feedback shared by people who participated in Metro's engagement efforts helped shape the recommendations and priorities of the ADA Transition Plan. It should be noted that some public feedback relates to recommendations for improvements that may fall outside of Metro's purview. Metro staff recognizes the desire for enhanced coordination between local government agencies, contracted services providers, and departments to address barriers across the public transportation network around the county.

#### 2.2.1 ENGAGEMENT APPROACH

Community engagement during the development of the ADA Transition Plan was vital to helping Metro understand the needs, concerns, and interests of people in the disability community. That information has been applied to develop the proposed actions and next steps described in the ADA Transition Plan. Throughout the process, the Engagement Team collaborated with a mix of disability-based community groups and advocacy organizations, as well as priority populations who support people with physical, intellectual, or developmental disabilities and their families. Metro staff also identified key individuals and partners who are subject matter experts due to their lived experiences and/or who work for organizations that provide services to the key audiences listed below.

While it is important that all King County residents have a say in the decisions of their local government, this engagement strategy focused intentionally on the following key audiences:

- ▶ People with physical, intellectual, or developmental disabilities
- ▶ Caregivers of people with physical, intellectual, or developmental disabilities
- ▶ People who identify as Black, Indigenous, and People of Color
- ▶ Older adults
- ▶ People living with lower incomes
- ▶ People who are immigrants or refugees and/or speak a language other than English at home

### 2.2.2 SUMMARY OF ENGAGEMENT METHODS

The Engagement Team employed multiple outreach methods to be as inclusive as possible in this community engagement effort. Those methods included:

- ▶ Initial Engagement Interest Meetings
- ▶ Informational sessions and presentations
- ▶ Informational interviews
- ▶ Focus groups
- ▶ An online open house and survey

**Compensation:** A best practice in equitable engagement, Metro offered compensation to Community Based Organizations (CBOs), as well as to participants, in recognition of the value of their time and expertise. Where appropriate, community participants were compensated \$75 for interviews, \$115 for focus groups, and \$25 for larger listening sessions. Compensation was paid directly to individuals via electronic or plastic gift cards. Metro provided additional funds to CBOs that partnered with Metro to promote and host community engagement activities.

#### **Initial Engagement Interest Meetings**

**Purpose:** Metro's ADA coordinator and community engagement staff led initial outreach and contact with identified organizations and partners to strengthen or develop direct relationships. Partners were informed of the project and invited to participate in multiple ways. Partners also shared additional ways engagement with their constituents could best take place. Metro staff identified the level of engagement interest and connected them with the Consultant Team for follow-up coordination. This initial process helped identify how best to engage key audiences, build long-term relationships, and increase participation.

For a full list see [Appendix A](#).

#### **Informational Sessions and Presentations**



**Purpose:** Metro provided regular briefings and presentations to its advisory committees and other mobility interest groups throughout the development of the ADA Transition Plan. **Table 1** summarizes the audiences and groups involved.

Metro Advisory Committees are King County Council-approved members who advise Metro, the King County Executive, the King County Council, local jurisdictions, and subarea transportation forums on transit issues and policy. Mobility Interest Groups are King County residents, transit users, non-profits, and advocacy groups whose membership includes people with lived experiences.

Metro also led information sessions at key meetings within the mobility community to leverage existing meeting opportunities to prevent ‘engagement fatigue’ for these organizations. Participants included people with lived experiences or who work for organizations that provide services to priority audiences.

By attending these meetings, Metro kept key audiences informed of the development of the ADA Transition Plan and learned about opportunities to engage others and how best to share and receive information.

**Table 1: Metro's informational session and presentations**

Audience	Group	Date
<b>Metro Advisory Committee</b>	Access Paratransit Advisory Committee (APAC)	6/12/2023
<b>Metro Advisory Committee</b>	Transit Advisory Commission (TAC)	6/12/2023
<b>Metro Advisory Committee</b>	King County Council Transit Interbranch	6/12/2023
<b>Mobility Interest Group</b>	Seattle Disability Commission	9/21/2023
<b>Mobility Interest Group</b>	Eastside Easy Rider Collab	9/26/2023
<b>Mobility Interest Group</b>	Snoqualmie Valley Mobility Coalition	10/13/2023
<b>Mobility Interest Group</b>	King County Disability Equity Network	10/13/2023

### **Informational Interviews**

**Purpose:** The Engagement Team identified key partners and interested parties for informational interviews, which informed the recommendations provided in this plan and shaped the activities conducted by the Engagement Team. The information gathered from the conversations helped the Engagement Team identify areas for additional consideration throughout the plan development process. The Engagement Team also requested referrals and collaboration for future engagement opportunities, such as focus groups.

**Approach:** The Engagement Team conducted three virtual interviews with groups who have knowledge about ADA transit accessibility issues and concerns. The Engagement Team used information and insights from these interviews to shape topics and questions for subsequent engagement activities. **Table 2** summarizes the audiences and agencies involved in the informational interviews.

**Table 2: Metro’s informational interviews**

Audience	Agency	Date
Internal and Partner agency staff	Disability Rights Washington	9/21/2023
Internal and Partner agency staff	King County Office of Equity, Racial and Social Justice	9/25/2023
Internal and Partner agency staff	Sound Transit – Accessible Services Department	10/4/2023

### **Focus Groups**

The Engagement Team conducted a series of focus groups to ensure it was hearing from a range of people with disabilities, including BIPOC individuals, older adults, and transit-dependent individuals. By engaging directly with members of these communities, the focus groups aimed to:

- ▶ Foster meaningful dialogue
- ▶ Identify barriers and opportunities of Metro’s programs, services, and activities
- ▶ Inform the development of strategies and actions to enhance accessibility and user experience for all

Metro used several methods to reach and involve these key participants, including direct email invites, digital toolkits for organizations to promote the focus groups to their members, and social media postings on platforms such as Facebook and LinkedIn.

During the focus group discussions, participants were encouraged to share their personal experiences and challenges related to accessing Metro services and information. These candid conversations provided valuable insights into the specific barriers that participants face. They allowed them to provide suggestions on what Metro can do to improve the overall experience for all current and future Metro customers. **Table 3** summarizes the organizations and audiences involved in the focus groups.

*[Remainder of page intentionally left blank]*

**Table 3: Metro's focus groups and listening sessions**

Organization	Date	# Participants	Audience
APAC/TAC	6/12/23	15	People affiliated with APAC/TAC
Whose Streets, Our Streets	6/17/23	9	Older adults
Disability Rights WA	9/22/23	11	People with disabilities and disability advocates
National Federation of the Blind	9/23/23	15	People who are blind or with low vision
King County Disability Consortium	9/26/23	15	Members
Chinese Information Service Center	9/28/23	36	Cantonese and Mandarin-speaking members
East African Senior Center	10/4/23	67	Tigrinya and Amharic-speaking older adults
Open Doors for Multicultural Families	10/5/23	14	Young adults, staff
The Arc of King County	10/10 and 10/11/23	20	English-speaking members; Spanish-speaking parents/caregivers
Non-affiliated Individuals	10/11/23	6	People with disabilities
Hopelink	10/13/23	9	Staff
King County Disability Equity Network Affinity Group	10/13/23	18	King County employees with disabilities
Lighthouse for the Blind	11/3/23 11/15/23 11/15/23 11/29/23	20	People who are hearing-blind; People who are DeafBlind

### **Online Open House and Survey**

The Engagement Team launched an [online open house and community survey](#) that was available from Sept. 18 – Oct. 15, 2023. The goal was to:

- ▶ Raise public awareness about the purpose, need, and value of Metro's ADA Transition Plan
- ▶ Ensure people have an opportunity to share feedback and communicate their priorities, preferences, and needs
- ▶ Build buy-in and support for future actions and decisions
- ▶ Ensure content is easy to understand, engaging, and accessible for all audiences

Approximately 300 participants took the survey, which was published online at [King County's Digital Engagement Hub](#). The survey used a variety of question formats, including open-ended questions, and asked for feedback on topics related to accessibility. Participants were asked to identify barriers they have experienced in accessing information about Metro, as well as types of barriers, barrier locations, and other accessibility issues while using Metro transit services.

## **Promotional Materials**

To reach as many people as possible from key audiences, Metro created and launched social media campaigns to raise awareness about the plan's development, share information, and drive traffic to the online open house and survey.

Additional promotional methods included:

- ▶ Promoting the survey in early conversations with key contacts and asking them to share it with their networks
- ▶ Publicizing the survey during focus groups, interviews, and presentations
- ▶ Co-promoting with CBO partners, which included using a digital toolkit to promote the information on their platforms
- ▶ Notifying Metro subscribers via emails and newsletters

The vast majority of visitors to the online open house reached the site through a link shared through GovDelivery (e.g., via subscriber emails and e-newsletters), followed by a blog post through Metro Matters, directly via the engagement hub, social media channels (e.g., X/Twitter, Facebook, LinkedIn), and links shared during virtual focus group meetings.

Examples of promotional materials can be found in [Appendix A](#).



## **2.3 ANALYSIS OF KEY THEMES AND OBSERVATIONS**

### **2.3.1 INFORMATIONAL INTERVIEWS**

Several key themes emerged from the three interviews. A high-level summary of the themes is described below. The interview guide with the full list of questions can be found in [Appendix A](#).

**What Metro is doing well:** Metro is known for being the top transit agency in the state. Metro's fixed route services are broad and expansive, and drivers are friendly and skilled in handling difficult situations.

**Areas for improvement:** Passengers shared difficulties with bus identification and obstructions at bus stops from poorly parked scooters and bikes. Interviewees identified the need for enhanced comfort and convenience of waiting areas at transit stops.

**Inclusivity gaps:** Services fall short for individuals who are deaf, visually impaired, and those with intellectual disabilities, especially during service disruptions.

**Suggestions for engagement:** Recommendations include evaluating the accessibility of Metro Flex and expanding engagement efforts through surveys and collaborations with community organizations.

**Partner agency improvements:** Sound Transit plans to improve station navigational aids and enhance communication and wayfinding tools for individuals with visual and hearing impairments.

**Other important insights:** Safety concerns for people with disabilities and the overall reliability of the system are major priorities for Metro's riders. Greater awareness of the challenges faced by non-English speakers with disabilities is also needed.

### 2.3.2 ONLINE SURVEY

To ensure Metro heard from key audiences, the survey asked participants to describe if they identified as someone with a disability or had another identity within the disability community. Over half of the survey participants identified as an individual with a disability. Received responses are summarized in **Table 4** below.

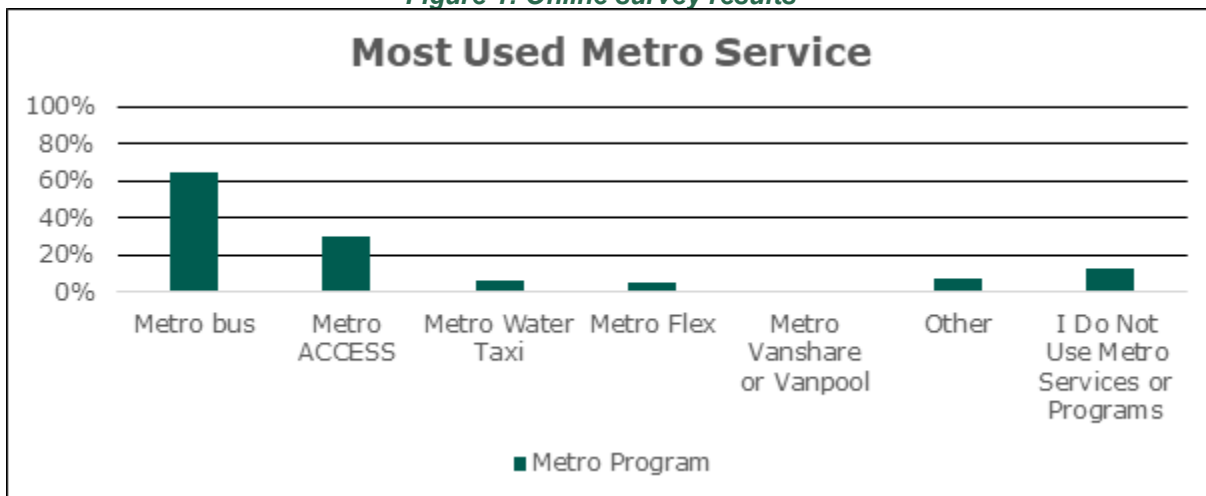
**Figures 1** through **4** and **Table 5** display additional results to key closed-ended and open-ended survey questions. A complete report of survey responses can be found in [Appendix A](#).

**Table 4: Online survey results – What best describes you?**

Survey Responses (290 total responses)	Number of Responses	% of Total*
Person with a disability	147	51%
Family member, friend, or caregiver of a person with a disability	63	22%
Work and/or volunteer at an organization that provides services to people with disabilities	48	17%
Person without a disability	22	8%
Other	10	3%

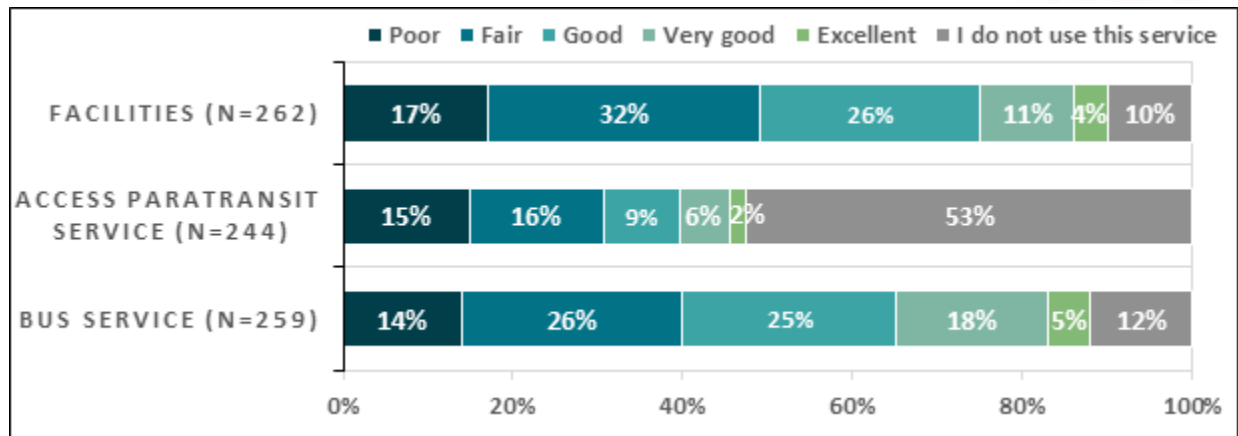
\*Total percentage is slightly greater than 100 due to rounding to the nearest whole number.

**Figure 1: Online survey results –**



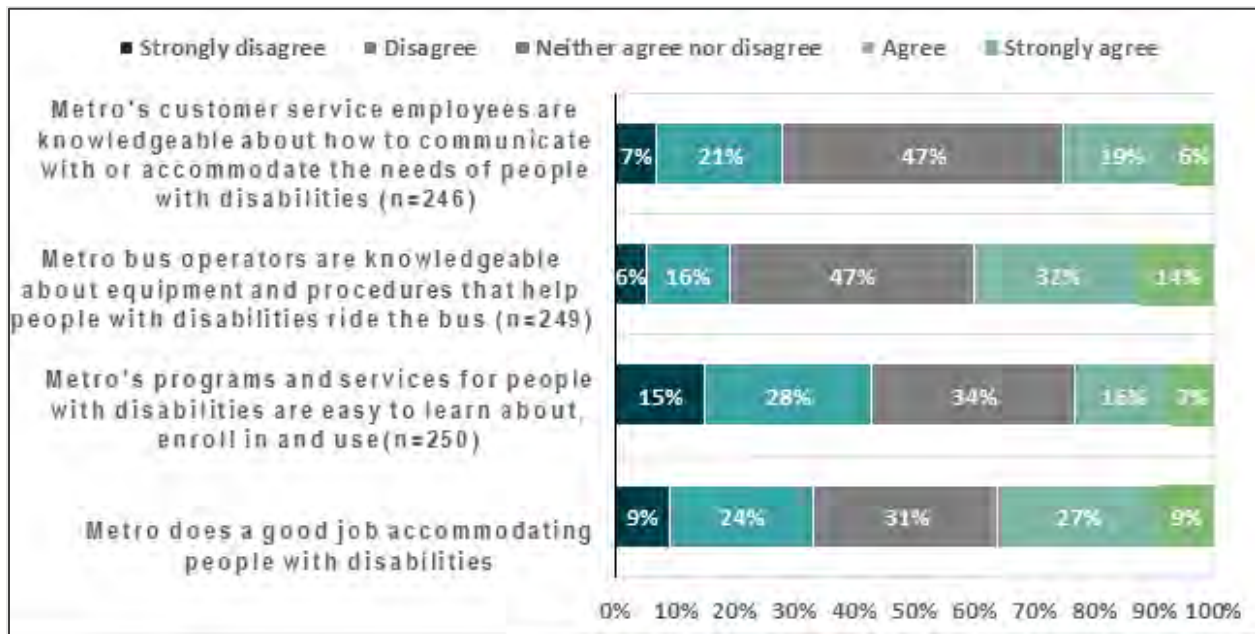
*What Metro services or programs do you use most often?*

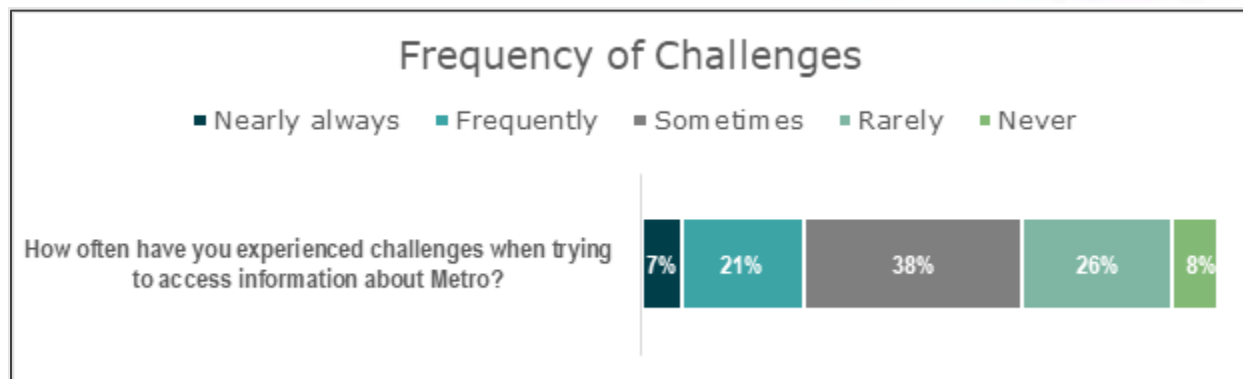




**Figure 2: Online survey results – Overall, how would you rate the accessibility of Metro's facilities, Access Paratransit, and bus service?**

**Figure 3: Online survey results – Please provide your overall view of the following statements**





**Figure 4: Online survey results – How often have you experienced challenges when trying to access information about Metro?**

**Table 5: Online survey results – which of the following actions would be most helpful for your ability to use public transit? Select your top four priorities.**

Priority	Ranking*	% of Responses**
Maintain, improve, and/or add sidewalks, curb cuts, or ramps at or around Metro facilities	1.97	48%
Improve ACCESS Paratransit services	1.75	41%
Maintain or improve facilities, including elevators, escalators, and wayfinding	2.09	37%
Make it easier to use trip-planning tools	2.56	34%
Better train bus operators and transit staff in how to best assist people with disabilities	2.57	29%
Improve access to Metro information into more accessible formats for online and print materials	2.51	23%
Better train customer service representatives in how to best assist people with disabilities	2.59	21%
Other (Please specify)	1.38	20%
Don't know / Not sure	1.88	8%

\* Average rank with 1 representing the highest priority

\*\* Percentage of respondents who selected the action as one of their top four priorities. No respondents specified that they used Metro Vanshare or Vanpool most often.

### **Open-ended questions summary of responses: What did participants say?**

**Question:** Please describe any accessibility challenges you have experienced when accessing information. What is your one top idea to make it easier to access the information you need in a timely manner?

#### **Theme: Website Accessibility Issues**

- ▶ Difficulty locating information due to complex website layouts or navigation menus
- ▶ Too many clicks are required to reach essential information
- ▶ Important information, such as rider alerts, might not be prominently displayed
- ▶ The absence of screen reader compatibility, voice navigation, alternative text for images, or descriptive link text
- ▶ Lack of captioning on videos or inadequate contrast ratios on websites
- ▶ Interactive elements are not keyboard-navigable

#### **Theme: Reliability of Digital Tools**

- ▶ Inconsistencies between actual service times and those reported by digital tools, such as trip planners, can lead to missed appointments or transit connections
- ▶ Lack of real-time updates in case of service disruptions, leaving passengers uninformed about delays or cancellations

#### **Theme: Clarity of Information**

- ▶ Information is not shared using straightforward language or clear instructions
- ▶ Difficult to pinpoint the most important information if it's not highlighted or summarized effectively

#### **Suggested Improvements**

- ▶ Ensure that information can be found in the fewest clicks possible and is organized logically
- ▶ Reduce the number of tabs or menus
- ▶ Use clear, descriptive labels for navigation links
- ▶ Include people with disabilities in the website design process
- ▶ Create a notification system informing registered passengers of cancellations or delays
  - ▷ Ensure that the system can provide alternatives when regular services are disrupted
- ▶ Adopt a real-time alert system for drivers to be notified when passengers are waiting at a stop

**Question:** What Metro programs, if any, would you like to participate in or use but can't due to accessibility challenges?

**Theme: Access Paratransit Service**

- ▶ **Reliability:** Participants noted that vehicles frequently not arriving on time was a major barrier for people with disabilities, often disrupting daily routines, such as getting to work on time.
- ▶ **Communication:** Participants shared that the lack of proactive communication when there are service disruptions is a major concern. Participants suggested creating a system to notify clients and their caregivers when issues arise.
- ▶ **Travel times:** Participants listed the long travel times as a barrier to using Access. Adapt the bus management system to reduce the amount of time it takes passengers to reach their destinations.
- ▶ **Safety:** One participant listed a lack of safety protocols for handling vehicle breakdowns and other emergencies.
- ▶ **Service availability:** Participants shared that the Access bus service needs to be more accommodating and available. This means expanding service hours, increasing the number of vehicles to reduce wait times, and ensuring that the service is flexible enough to accommodate the varying needs of clients with disabilities.

**Theme: General Bus Transit**

- ▶ **Frequency and Reliability:** Some participants shared that bus service is unreliable and infrequent, which affects their ability to use it for work, appointments, and other scheduled activities. This includes reports of buses not arriving on time or service being so poor that it's like having no service at all.
- ▶ **Onboard accessibility:** Participants shared the need for buses to be more wheelchair accessible. Concerns were also raised about bus drivers not properly aligning with curbs or "kneeling" the bus. Participants noted a lack of curb ramps as a limiting factor in using bus service.
- ▶ **Safety:** Participants shared the need for improved security on public transit to make riding Metro buses safer.
- ▶ **Information access:** Participants suggested making online information about bus services easier to understand.
- ▶ **Infrastructure:** Participants cited the need for benches and shelters at bus stops to make it more comfortable to wait for buses.
- ▶ **Service hours:** Requests for expanded service hours. In particular, requests for service late at night when service typically decreases, making it difficult for some to get home.
- ▶ **Route changes:** Participants shared the impacts of recent route changes increasing the number of bus transfers needed to reach the same destinations.
- ▶ **Transit facilities:** Several participants cited the need for alternatives when facilities such as elevators and escalators are down, and they cannot use stairs. Suggestions include providing more elevators, ramps, or other accessible pathways.



## 2.4 CONCLUSION AND ACTIONS FOR CONSIDERATION FROM COMMUNITY ENGAGEMENT

Based on the completed engagement activities described in [Section 2.2](#) and analysis of the key themes summarized in [Section 2.3](#), the following summary of feedback received by Metro from the community engagement participants should be considered as Metro works to improve accessibility for the users of Metro PSAs.

### Priorities for Possible Improvements

#### Enhanced Communication and Information

- ▶ **Real-time updates:** Develop and implement a system to provide real-time information at bus stops in accessible formats, such as audio announcements and Braille displays.
- ▶ **More communication methods:** Offer information in various ways to ensure all passengers can access necessary information. This includes printed schedules, brochures, and direct mail options.
- ▶ **Navigational clarity:** Offer clear and easy-to-understand instructions for navigating the transit system, getting bus passes, and paying fares.
- ▶ **Website redesign:** Update the Metro website to ensure it is compatible with various assistive technologies, adheres to web accessibility standards, and provides information in multiple accessible formats, including Braille.

#### Cultural and Operational Changes

- ▶ **Service accountability:** Monitor service metrics, like on-time performance, and establish an open-loop process for reporting key performance metrics during business reviews to create a more reliable and trustworthy service for passengers.
- ▶ **Driver training:** Enhance driver training to include service knowledge and cultural competency to improve the interaction between drivers and riders with disabilities.

#### Safety Enhancements

- ▶ **Bus stop safety:** Improve lighting and security cameras at bus stops to increase safety for all passengers, particularly those who travel during early morning or late evening hours.
- ▶ **Safety communications:** Inform passengers about any safety features at Metro facilities to allow people with disabilities to navigate safely during adverse events such as traffic or weather events causing route detours.

#### Service Accessibility and Support

- ▶ **Simple application process:** Simplify the application process for Access services to make it easier for people with disabilities and those facing language barriers.
- ▶ **Caregiver inclusion:** Provide more support to and include caregivers in the Access service process.
- ▶ **Accessing transit training:** Offer programs that teach individuals how to navigate the transit system to promote independence and confidence among new riders.

## Facility Accessibility and Accommodation

- ▶ **Transit stop amenities:** Increase the number of seats and shelters at bus stops to accommodate passengers as they wait, particularly those who cannot stand for long periods.

## Location-Specific Improvements

- ▶ **Snoqualmie Valley:** Include more rural communities in the service area of Metro transit routes. The longer distance to the nearest bus stops from where people live makes it challenging for residents to access transportation assistance programs. This area was also highlighted as having significant communication issues about updates and complaints.
  - ▷ Note that Snoqualmie Valley Transit is a major provider in the Valley; however, the public engagement feedback received for this project was specific to King County Metro.
- ▶ **South Seattle and South King County:** Seek partnerships with local jurisdictions to install and improve sidewalks in places like south Seattle and south King County, which have large populations of people who identify as BIPOC. The need for more transit options with free or more accessible costs in these areas was emphasized to increase the use of Metro services.
- ▶ **Mercer Island:** Make Access available even when fixed routes aren't running. Participants noted that in places such as Mercer Island, where fixed route buses don't run on weekends, Access services are also not available.

## Equity Considerations for Improvement Measures

- ▶ **Integration of services:** Combine all Metro services (Access, Flex, Trip Planner) into one platform (such as a single digital app) for ease of use and to speed up service delivery.
- ▶ **Inclusivity and diversity in engagement:** Maintain consistent outreach to diverse communities, including those with limited English proficiency, and implement inclusive communication methods beyond social media.
- ▶ **Language accessibility:** Provide more accessible services for people who speak languages other than English, such as establishing multilingual hotlines and printed materials to assist those who face language barriers.
- ▶ **Accessible fare platforms:** Modify fare payment systems to be accessible at wheelchair height so passengers with mobility impairments can travel more independently.



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### 3.0 SELF-EVALUATION OF PROGRAMS, SERVICES, AND ACTIVITIES

This section summarizes a comprehensive review of the existing programs, services, and activities offered to the public or Metro employees by Metro and partner companies providing services under the Metro name. The review focused on three (3) main areas:

1. Identify discriminatory practices
2. Identify discriminatory language
3. Identify opportunities to improve accessibility-related procedures

The Metro Divisions and areas of focus described in **Table 6** provided input into the self-evaluation process:

*Table 6: Metro team participation and areas of focus*

Participation	Area of Focus
Bus Operations Division	Base Management
Bus Operations Division	Training
Bus Operations Division	Transit Control Center
Bus Operations Division	Service Quality
Bus Operations Division	System Impacts
Mobility Division	Service Planning
Mobility Division	Transit Route Facilities
Mobility Division	Research and Innovation Program
Mobility Division	Access Paratransit
Mobility Division	Customer Information
Capital Division	Capital Planning – Facilities and State of Good Repair
Capital Division	Transit Civil Engineering
Capital Division	Project Management – Facility Improvements and State of Good Repair
Capital Division	Vehicle Procurement
Transit Facilities Division	Facilities Maintenance
Vehicle Maintenance Division	Fleet Engineering
General Managers Office – Strategic Communications and Engagement	Partnerships and Engagement
King County Office of Equity, Racial, and Social Justice	Disability, Equity, and Civil Rights

The information in the report was gathered from Metro staff and public information available on Metro's website. After evaluating the information, the Consultant Team initiated a discussion of additional programmatic elements to understand the operations of each division better. The information is included in the detailed sections below, with specific information for several Metro

Divisions included in [Section 3.3](#). The review identified programmatic barriers that prevent individuals with disabilities from accessing the PSAs offered by Metro.

- ▶ Metro is a large transit agency comprised of multiple divisions whose services span 39 jurisdictions. Additionally, Metro contracts with many companies to offer a breadth of mobility services with a level of quality expected by system users, such as Access Paratransit services. Upon reviewing Metro's programs, services, activities, and facilities, key themes emerged regarding accessibility. A summary of the main observations from this review is included below, with more detailed information included throughout the remainder of this chapter.

## SUMMARY OF OBSERVATIONS

- ▶ Regarding accessibility, Metro should ensure consistency in terms of communications, policies, and procedures across the spectrum of services provided.
- ▶ Employees should receive regular and consistent training related to ADA as it applies to their area of expertise to ensure conformance with accessibility requirements.
- ▶ Metro's size, both in terms of the services offered and the number of employees, is large enough that additional staff, besides the current ADA Services Administrator, is needed to best implement the ADA conformance program and properly support Metro.
  - ▷ As discussed in the recommendations and next steps throughout this document, expanding this role could be accomplished by developing a new team or staff group focusing on accessibility across Metro's various divisions.
- ▶ Metro should prioritize evaluating the condition and conformance of all owned and operated facilities to grasp the extent of current accessibility barriers, prioritize improvements, and fully complete the agency's ADA Transition Plan.
- ▶ Metro should more clearly define station area and stop guidelines and ensure broad awareness and collaboration in these guidelines to meet the needs identified in the Transition Plan. While some work is happening, better coordination could ensure Metro meets the intent outlined in the Strategic Plan to prioritize passenger access, support access for people with disabilities, and discourage single-occupant vehicle access at transit stops.



## 3.1 METRO ORGANIZATION AND DIVISIONAL ROLES AND RESPONSIBILITIES

Under the ADA, Metro must complete a Self-Evaluation of facilities, programs, policies, and practices. The Self-Evaluation identifies and provides possible solutions to policies and practices that are inconsistent with Title II requirements. To be conformant, the Self-Evaluation should consider all of Metro's programs and services.

To comply with the requirements of the plan, Metro must take corrective measures to achieve program accessibility through:

- ▶ Relocation of programs to accessible facilities when possible
- ▶ Modifications to existing programs so they are offered in an accessible manner

- ▶ Structural modifications to existing facilities to conform to its accessibility requirements to the maximum extent feasible
- ▶ Policy modifications to ensure nondiscrimination
- ▶ Providing auxiliary aids, such as interpreters, written materials, or assistive listening devices and systems, to produce effective communication

When conformance cannot be achieved, modify to the maximum extent feasible.

When choosing a method of providing program access, Metro should give priority to promoting inclusion among all users, including individuals with disabilities.

All PSAs offered by Metro to the public or employees must be accessible. Accessibility applies to all aspects of each program offered, service provided, and activity or events hosted by Metro. This includes all business decisions, including advertisement, orientation, eligibility, participation, testing or evaluation, physical access, provision of auxiliary aids, transportation, policies, and communication.

Metro 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 people, or result in an undue financial and/or administrative burden. This determination should generally be made by the ADA/504 Coordinator and/or an authorized designee of Metro, such as Metro's General Manager or their designee, and must be accompanied by a written statement detailing the reasons for reaching the determination.

The determination of undue burden should be based on an evaluation of all resources available. If removing a barrier is judged unduly burdensome, Metro should consider all other options for providing access to ensure that individuals with disabilities receive the benefits and services of the program or activity. This process should be fully documented.

Metro must also ensure conformance of all programs, services, and activities for the local government agencies, contracted service providers, and companies involved in projects for facilities owned or maintained by Metro, especially those that carry the Metro brand. This means all services must provide consistency. As stated in the recommendations and next steps included in this document, one way to achieve this conformance is the development of a new ADA-focused team or staff group and agency-wide adoption of consistent policies and practices that will resolve inconsistencies across divisions and jurisdictions.

### **3.1.1 SELF-EVALUATION: ADA CORE TEAM AND STEERING COMMITTEE QUESTIONNAIRES AND INTERVIEWS**

To understand the breadth of the programs, services, and activities offered by Metro that impact the public, the Consultant Team conducted a review of Metro's website and an interactive survey with Metro staff. Program, services, and activities questionnaires were submitted to each division within Metro. The questionnaires were tailored to the PSAs offered by each division and used to finalize the determination of ADA conformance for each Division's PSA. The Consultant Team reviewed the responses and identified possible solutions to remove various barriers. Those solutions are included in this chapter of the ADA Transition Plan.

Select members of each division were appointed ADA Core Team representatives for their division and served as points of contact for the Consultant Team. They were also responsible for filling out the surveys and participating in the telephone interviews as part of the discovery process. Metro leadership staff members within each division were appointed to be ADA Steering Committee representatives, and their role was to support the ADA Core Team and

provide high-level guidance related to the intent and status of Metro's programs, services, and activities.

See [Appendix B](#) for copies of the completed Divisional Survey and Interview Observations summaries in their entirety. The possible solutions associated with each of the divisional surveys and interviews have been incorporated into [Section 3.3](#) of this document, as applicable, for all Metro programs, policies, and procedures.



## 3.2 PROGRAMS, PROCEDURES, AND POLICIES REVIEW

### 3.2.1 ADA COORDINATOR

Under Title II of the ADA, when a public entity has 50 or more employees, it is required to designate at least one (1) qualified responsible employee to coordinate conformance with ADA requirements. This individual's name, office address, and telephone number must be available and advertised to employees and the public. This allows someone who can assist with questions and concerns regarding disability discrimination to be easily identified.

#### Observations

Metro, after recognizing the need for centralizing communications related to ADA conformance efforts within Service Development, hired a dedicated ADA Conformance Officer in 2017. The role was intended to advise and assist Metro Transit in conformance with the Americans with Disabilities Act and other applicable regulations for Metro Transit's fixed route, paratransit, and community connections programs. As Metro's subject matter expert, the role evolved to ensure conformance in all divisions while tending to the administrative tasks required under Section 504 of the Rehabilitation Act of 1973.

#### Completed Actions

Metro has appointed Dion Graham as the ADA/504 Coordinator for Title II. The ADA Coordinator's contact information is available on Metro's website at <https://kingcounty.gov/en/dept/metro/about/policies/ada>.

Dion Graham, ADA/504 Coordinator  
ADA Services Administrator  
201 South Jackson Street  
Seattle, WA 98104  
Phone (Office): 206-477-0321  
Email: [ada@kingcounty.gov](mailto:ada@kingcounty.gov)

### **Possible Solutions (ongoing efforts)**

- ▶ The ADA/504 Coordinator's contact information must be provided to interested parties. The following distribution methods are recommended:
  - ▷ Post on the Metro website
  - ▷ Prominently display in common areas that are accessible to all employees and areas open to the public
  - ▷ Provide in materials that are distributed by Metro for meetings and events where requests for auxiliary aids or services for effective communication might be needed
  - ▷ Provide in materials distributed by Metro where ADA questions or concerns may arise

### **3.2.2 ROLES AND RESPONSIBILITIES OF THE ADA/504 COORDINATOR**

Below is a list of qualifications for ADA Coordinators as recommended by the U.S. Department of Justice:

- ▶ Familiarity with the entity's structures, activities, and employees
- ▶ Knowledge of the ADA and other laws addressing the rights of people with disabilities, such as Section 504 of the Rehabilitation Act
- ▶ Experience with people with a broad range of disabilities
- ▶ Knowledge of various alternative formats and alternative technologies that enable individuals with disabilities to communicate, participate, and perform tasks
- ▶ Ability to work cooperatively with local entities and people with disabilities
- ▶ Familiarity with any local disability advocacy groups or other disability groups
- ▶ Skills and training in negotiation and mediation
- ▶ Organizational and analytical skills

An effective ADA Coordinator can efficiently assist people with disabilities with questions. These roles and responsibilities are consistent with the Department of Justice's guidance for "An Effective ADA Coordinator" (<https://www.ada.gov/pcatoolkit/chap2toolkit.htm>).

### **Observations**

Metro's ADA Services Administrator serves as the agency's ADA/504 Coordinator and provides accessibility oversight of all Metro services, programs, vehicles, transportation facilities, and construction projects. This role assists in identifying and mitigating existing barriers that may impact full and equal access for individuals with disabilities. Complaints and comments from individuals with disabilities or any persons representing an individual with a disability pertaining to facility accessibility, programs, transit operations services, and requests for Reasonable Modification involve the ADA Coordinator to determine trends and policy/procedural effectiveness.



### **Possible Solutions**

Metro is responsible for providing ADA services to a large number of riders. To ensure that these services meet the needs of all riders, additional resources are needed to manage changes in service, as required by Section 504 of the Rehabilitation Act. Therefore, it is recommended that a team or staff group be established, led by the ADA Services Administrator/ADA Coordinator. This team will be responsible for reviewing all work associated with the ADA Transition Plan in a timely manner.

### **3.2.3 ADA GRIEVANCE POLICY, PROCEDURE, AND FORM WITH APPEALS PROCESS**

Metro has a Grievance Procedure posted on the website at <https://kingcounty.gov/en/dept/metro/about/policies/ada>. The Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 ("ADA"). It may be used by anyone who wishes to file a complaint alleging discrimination based on disability in the provision of services, activities, programs, or benefits by Metro.

Metro, as a local government with 50 or more employees, is required to adopt and publish procedures for resolving grievances that may arise under Title II of the ADA promptly and fairly. Per the Department of Justice's guidance for establishing and publishing grievance procedures (<https://www.ada.gov/pcatoolkit/chap2toolkit.htm>), the grievance procedure should include:

- ▶ How and where a complaint under Title II may be filed
- ▶ Alternative methods of filing
- ▶ Time frames and processes to be followed by the complainant and the government entity
- ▶ How to appeal an adverse decision
- ▶ How long complaint files will be retained

### **Observations**

- ▶ Metro's website indicates a compliant grievance procedure with an appeals process is in place. However, there is no form for a complainant to fill out; all that is provided is an email address. Without a form, important information can be omitted from complaints.
- ▶ Several divisions were unfamiliar with the ADA Grievance process for employees and indicated their process was to tell an employee to ask a supervisor.

### **Possible Solutions and Completed Actions**

- ▶ Metro should provide a form for the grievant to fill out. This ensures that necessary information is not only captured but also categorized for analysis.
- ▷ Metro's Grievance Procedure and Form with Appeal Process for Title II of the ADA was reviewed and updated in August 2023, and a copy of Metro's Grievance Procedure and Form are included in [Appendix C](#).
- ▶ Metro's Title II Grievance Procedure and Form should be posted on its website, and information on how to obtain alternative formats of the form should be provided.

- ▶ All management and supervisory personnel should be trained on the grievance process so they can inform employees about how to use it properly.

#### **3.2.4 REASONABLE MODIFICATION REQUEST POLICY, PROCEDURE, AND FORM**

Metro has a Reasonable Modification Policy posted on the website. The policy's purpose is to ensure that Metro Transit offers equal and effective opportunities and access to public transportation services for persons with disabilities in full conformance with the provisions of Title II of the Americans with Disabilities Act of 1990 and Section 504 of the Rehabilitation Act of 1973.

Title II of the ADA establishes a reasonable modification request process that allows the public to request a modification that will provide equal access to any Metro program, service, or activity. Metro will reasonably modify its policies, practices, or procedures to avoid discrimination unless the modification fundamentally alters the nature of its program, services, or activity.

##### **Observations**

- ▶ The reasonable modification form is available on the Metro website, but elements do not conform with Section 504 guidance. The existing form does not outline the process and time associated with the reasonable modification request.

##### **Possible Solutions**

- ▶ An expectation of process and time should be provided, and some wording changes should be made to the introduction on the page. The sentence “before Metro is expected to provide the service” should be changed to “to allow Metro the time necessary to prepare the modification properly.”

#### **3.2.5 ADA GRIEVANCE POLICY, PROCEDURE, AND FORM WITH APPEALS PROCESS FOR SECTION 508 OF THE REHABILITATION ACT**

Section 508 of the Rehabilitation Act of 1973 requires that all electronic and information technologies developed and used by any federal government agency be accessible to individuals with disabilities. To comply with federal requirements, the State of Washington adopted similar electronic and information requirements, which can be found with all of the state requirements at <https://wa.gov/people-with-disabilities/accessibility-wa-state-law-and-policy>

### **Observations**

The website was not evaluated as part of this phase.

### **Possible Solutions**

- ▶ A full analysis of the website, its functions, and the interactivity with the public is necessary to determine full Section 508 and State of Washington electronic and information requirement conformance.

## **3.2.6 PUBLIC NOTICE UNDER THE ADA**

The ADA public notice requirement applies to all state and local governments covered by Title II, including entities with fewer than 50 employees. The target audience for the public notice includes applicants, beneficiaries, and other people interested in the entity's PSAs. This notice must include information regarding Title II of the ADA and how it applies to the public entity's PSAs. Publishing and publicizing the ADA notice is not a one-time requirement. State and local government entities should provide the information continuously, whenever necessary.

### **Observations**

- ▶ The public notice on Metro's website complies with ADA requirements. However, partner agencies and companies may have different notices.

### **Possible Solutions**

- ▶ For consistency, each local agency and contract service provider operating on behalf of Metro should sign an agreement adopting the ADA Public Notice provided by Metro. This should become a standard agreement with new local government agencies or contract service providers.

## **3.2.7 ALTERNATE FORMAT POLICY, PROCEDURE, AND REQUEST FORM**

Under the ADA, Metro is required to provide accessible communications that comply with the ADA standards. This includes any documents or information that are distributed by Metro. Metro must have an action plan to accommodate a request for an alternate format. For example, the Department of Justice does not expect entities to have braille copies of all documents. However, braille copies must be readily available upon request. Readily available means that once a request is received, a policy and procedure should be in place to reasonably accommodate or modify the document or information requested. This document or information must be provided to the requester within a reasonable time.

### **Observations**

- ▶ None of the staff interviewed had a clear process, procedure, or guidance for providing alternate formats. The divisions most affected have comments within their divisional analysis.

### **Possible Solutions**

- ▶ Develop a systemwide alternate format policy that will be used by all divisions, local government agencies, and contracted service providers.
- ▶ Where applicable, include alternate format training in the overall division training to ensure that Metro's understanding of alternate formats and the associated requirements is consistent.

## **3.2.8 EMERGENCY MANAGEMENT PLAN REVIEW**

Metro should enhance service quality, operations training, planning, and community engagement. It can also strengthen relationships with Hopelink and other partner organizations.

Metro has representatives on of the Regional Alliance for Resilient and Equitable Transportation (RARET). This workgroup includes emergency managers, transportation providers, human service agencies, and community advocates representing King, Pierce, and Snohomish counties. They produce reports highlighting RARET coordination efforts during emergencies and resources for transportation providers.

Emergency planning and management have become increasingly important, especially when assisting customers and system users with disabilities. Identifying these individuals and including information on how to help them in community emergency plans and emergency management teams is crucial. To ensure the safety of everyone in case of a local emergency, Metro should have a comprehensive Emergency Management Plan that provides clear guidelines on how to assist customers and users with disabilities.

Disabilities can manifest in varying degrees, and the functional implications of these differences are crucial to consider during emergency evacuations. One person may have multiple disabilities, while another may have a disability with fluctuating symptoms. Therefore, every agency must have a plan in place to evacuate a building, regardless of its occupants' physical conditions.

It is impossible to plan for every situation that may arise in an emergency, but being as prepared as possible is crucial. One effective way to achieve this is by seeking input from various individuals and organizations, such as executive management, human resources, employees with disabilities, first responders, occupants, and nearby businesses and pedestrians. Involving such stakeholders in the development of Metro's Emergency Management Plan will help everyone understand the evacuation procedures and the challenges that businesses, building owners and managers, and people with disabilities may face.

Metro has the additional duty of ensuring that it has an emergency plan in place for its vehicles. Metro's Operations Manual contains well-defined policies and procedures for different types of vehicle emergencies. Moreover, there is a separate document exclusively dedicated to emergency weather conditions.

### **Observations**

- ▶ A facility Emergency Management Plan was not submitted for review, but emergency sections in other documents are not specific to serving people with disabilities.
- ▶ The emergency plans for vehicle emergencies appropriately cover getting people with disabilities out of the vehicles.
- ▶ There is no indication the emergency information developed by Metro is shared and implemented consistently with all contracted service providers.
- ▶ In the emergency planning found, there are no indications that any process/procedures are in place to move electric buses out of the way in the event of a power outage.

### **Possible Solutions**

- ▶ Emergency procedures need to be developed to ensure manual backup procedures are in place to get people with mobility impairments out of the vehicle in an emergency. Operator training should immediately follow.
- ▶ Metro was updating the facility emergency management plan at the time of review. The new version should be reviewed for conformance, and once approved, information about emergency management should be included in Metro training.
- ▶ The vehicle emergency plans must be addressed with all contracted service providers. Metro should include a document requiring a signature to help ensure consistency.

### **3.2.9 PREVIOUS ADA COMPLAINTS REVIEW**

Metro must ensure that no qualified individual with disabilities is excluded from participation, denied the benefits of, or otherwise subjected to discrimination under any program, service, or activity administered. Sections 37.17 and 27.13 require all agencies to have procedures to address complaints alleging ADA violations.

A review of previous ADA complaints from the past five (5) years was completed to ensure that all complaints have been addressed or are planned to be addressed as part of the improvements identified in the plan.

### **Observations**

- ▶ The main areas of complaint for the fixed-route service concern operator behavior, communication, and accessibility of the bus stops.
- ▶ Complaints regarding paratransit services include late pick-up and/or drop-offs, and operator behavior.
- ▶ Since different service providers contract with Metro to provide identical services under the Metro name, and each contract service provider has its distinct policies and procedures, the probability of inconsistencies related to accessible service is increased.



### **Possible Solutions**

- ▶ Metro should establish uniform customer service policies for both its own services and those provided by contracted service providers. These policies and practices should be incorporated into the training provided by Metro to each contracted service provider. Moreover, when onboarding new contracted service providers and their staff/volunteers, completion of Metro-provided training should be mandatory, and responsible agencies should be required to sign off on their acceptance of these policies.
- ▶ While paratransit contract service providers should each have policies for using consistent communication to better engage with users, Metro should ensure that each contract service provider's training is consistent with Metro's communication standards. Requiring contracted service providers to attend training by Metro would improve consistency.

#### **3.2.10 DESIGN STANDARDS REVIEW**

The King County Metro Transportation Plan, Standard Construction Details, and Traffic Specifications were reviewed for conformance with the 2010 ADA Standards, the 2006 DOT Standards, and the current version of PROWAG.

Additional information about the standards used, their application, and observations are detailed in [Section 3.3](#) under each Division.



### **3.3 DIVISION-SPECIFIC PROGRAMS, PROCEDURES, AND POLICIES REVIEW**

To better understand the function and processes in each Metro division, the Consultant Team reviewed the website and documents provided by Metro's ADA Coordinator and evaluated them for conformance with the ADA. The team then developed a list of questions for divisional representatives to answer. Observations from the surveys and interviews are provided below, along with potential solutions to improve access to Metro's programs, services, and activities.

#### **3.3.1 CAPITAL DELIVERY DIVISION**

Metro's Capital Delivery Division plans and builds capital projects using a portfolio hierarchy structure. Capital Delivery Division work includes planning for fleet and infrastructure, management, design, and construction of projects. This includes partnerships with community engagement and local government agencies where projects are located. Metro works to meet and/or exceed obligations to make programs, services, and activities in the public right-of-way readily accessible to and usable by individuals with disabilities.

Specific projects and programs that receive federal funding also comply with regulations that pertain to specific grants and programs. For example, RapidRide's capital planning complies with U.S. Department of Transportation (DOT) Americans with Disabilities Act (ADA) regulations in 49 CFR Part 37, which are specific to RapidRide.

As another example, vehicle procurement follows clear procurement processes and the use of subject matter experts, including the ADA Coordinator, to advise fleet procurement to ensure that ADA Accessibility Guidelines for Transportation Vehicles established by the US Access Board are met or exceeded. Metro's Fleet Policy Planning Steering Committee considers



current ADA requirements, procurement alternatives, and new technologies to meet the needs of riders with disabilities. The ability to sign off on vendor models to ensure public input is considered helps meet the ongoing needs of riders with disabilities.

### **Observations**

- ▶ When constructing or altering a bus stop (or other transportation facility) Metro must ensure that the new or altered facility is accessible to people with disabilities per Section 37.41 of the ADA. The U.S. DOT standards for transportation facilities provide specific requirements for bus boarding and alighting areas in Section 810.2. The ADA standards for bus stops and other transportation facilities are also discussed in the Vehicle and Facility Accessibility section of the DOT standards. Any facility built or altered since January 26, 1992, should either be in conformance or be on a schedule to be improved for conformance. The Capital Division does not have a schedule or organized effort to verify conformance. Conformance of existing facilities is assessed as sites are altered or improved. Metro has thousands of bus stops, including many built before 1992 and many with no plans for improvement.
- ▶ All capital projects, including projects designed by third-party architectural and engineering firms, must undergo 30%, 60%, and 90% Internal Design Reviews, including Pre-Permit Application Reviews, with Milestone Checklists including checking for ADA conformance. During Construction, Metro's project representative implements the authorized and certified construction documents, supported by the authorizing engineers and architects, internal and/or consultant. Metro expects all consultant-designed plans and specifications will meet current ADA standards.
- ▶ The Capital Delivery Division does not have an existing plan for evaluating and remediating the ADA conformance of bus stops, park-and-rides, and transit centers.
- ▶ Based on discussions with Capital Delivery Division staff, Metro has not provided accessibility training to Metro staff.
- ▶ The Capital Delivery Division generally does not receive reports of events or incidents involving people with disabilities or modification requests. As a result, staff does not have a formal process to track modification requests. Developing this process, whether directly within the Capital Delivery Division or through a partnership with another Division or Section, can help improve transit environments as future sites are planned or designed.
- ▶ The Capital Delivery Division has not established a recurring ADA-specific training program for staff.
- ▶ For planning and design of projects, Metro solicits targeted feedback from priority populations, including Black, Indigenous, or People of Color (BIPOC), elderly, youth, limited English proficiency, and low-income residents.
- ▶ The Capital Delivery Division staff is unaware of ADA requirements, such as the grievance process and how or when to get an auxiliary aid if one is requested for a public meeting.
- ▶ The Capital Delivery Division does not currently have an organized barrier removal program.

### **Possible Solutions**

- ▶ Metro should conduct a full assessment of each Metro-owned or maintained facility and bus stop in the service area. Metro cannot confirm conformance at this point and may lose state and federal funding without a comprehensive assessment. Facility assessments should be prioritized and established as part of an existing Metro program (i.e., the Transit Facilities Condition Assessment Program). The evaluation of these facilities should be accomplished as part of a future update to this Transition Plan.
- ▶ Metro should integrate an accessibility program agency wide. This will provide greater conformance and better meet the service needs of customers with various disabilities.
- ▶ Metro should determine responsibility for tracking ADA-related issues, modification requests, and a process for sharing information across the division and agency.
- ▶ Metro should schedule ADA training specific to Capital Delivery Division's work to ensure an in-depth understanding of how their internal decisions affect the traveling public and inform them of the basics of the ADA.
- ▶ Metro should establish a Barrier Removal Program adjacent to or dependent on the Transit Facilities Conditions Assessment Program to correct identified deficiencies/barriers. Should a local jurisdiction have additional local accessibility requirements that are more stringent than the federal standards, the local jurisdiction requirements should be followed. This should include a process to determine how, when, and who is responsible for modifying and removing barriers.

### **Proposed Metrics**

- ▶ Metro should establish a database within the existing Transit Facilities Condition Assessment Program to track the status and progress of facility accessibility condition assessments over time. Metro should establish a timeframe in which all facilities will be assessed for accessibility conformance (e.g., evaluate 25% of all transit stops for conformance annually over the next four (4) years).
- ▶ Metro should establish a Barrier Removal Program database that tracks the progress of ADA deficiency removal projects. Metro should establish a timeframe in which all accessibility barriers will be removed (e.g., improve 5% of all transit stops annually over the next 20 years).
- ▶ Metro should establish an ADA training program for all Capital Delivery Division staff, track attendance, and request feedback from staff to determine the effectiveness of the training (e.g., all Capital Delivery Division staff will receive training within the next two (2) years).
- ▶ Metro should develop a system to track each project in design and ensure it has been reviewed for ADA conformance at various project milestones.
- ▶ Metro should establish a process for tracking public ADA-related issues and modification requests. Additionally, Metro should determine which divisions and staff are responsible for tracking the issues and requests.

### 3.3.2 BUS OPERATIONS DIVISION

King County Metro's Bus Operations Division focus is in response to Part 37 – Transportation Services for Individuals with Disabilities (ADA). The Bus Operations Training Section is focused on building a curriculum that ensures that personnel are trained to proficiency, as appropriate to their duties, so that they operate vehicles and equipment safely and properly assist and treat individuals with disabilities. Service can be measured in its quality: reliability, overcrowding, on-time performance, wait time, customer and employee satisfaction. The focus will be on policies related to procedures when dealing with incidents related to bus operations, customer comments, data collection protocol, policies, and procedures designed to intervene/prevent discrimination from occurring as barriers that deny accessibility for riders with disabilities.

#### Observations

- ▶ Bus Operations personnel are not clear on the role of Metro's ADA coordinator.
- ▶ All new transit operators receive ADA training for securing mobility aides, using preferred ADA seating areas, and implementing Metro's ADA policies. Videos featuring customers with disabilities are shown and discussed. Operators are encouraged to visit the training office for any clarification or questions regarding ADA policy. Annual training, when provided, includes an ADA refresher segment.
- ▶ There is a lack of training regarding understanding the needs of people with varying disabilities or addressing people with disabilities appropriately.
- ▶ Bus Operations works with Customer Service to identify and focus on ADA-related comments. "ADA-related" is a category within the Customer Comment system. Bus Operations does not track modification requests, which could help improve transit environments as future sites are planned and designed.
- ▶ Non-operator personnel within Bus Operations have not had any specific ADA training.
- ▶ Bus Operations receives and reviews information related to trends and complaints but does not track information relating to people with disabilities. If the situation warrants, an operations bulletin is sent to drivers, who are required to read it every day.
- ▶ Bus Operations staff is unaware of the basic ADA requirements, such as the grievance process and how or when customers can get an auxiliary aid if requested.
- ▶ Some rules for operators are not clear in the Bus Operations Manual (The Manual) regarding assisting a passenger with a disability, except for securement. According to the manual, operators can assist according to their "capabilities." This also varies between contracted providers, increasing the opportunity for inconsistency.
- ▶ According to the Bus Operations Manual, operators are responsible for ensuring that all stops, route numbers, and destinations are announced accurately, audibly, and consistently by the On-Board System (OBS) or, if that is not working, using the Public Address system (PA). The following information is announced:
  - ▷ All stops along a route
  - ▷ Routes and destinations at zones used by two or more routes

On fixed route transit systems, the ADA requires transit agencies to announce stops, at least, at:

- ▷ Transfer points with other fixed routes

- ▷ Other major intersections and destination points
- ▷ Intervals along a route sufficient to permit individuals who are blind or have vision impairments or other disabilities to be oriented to their location
- ▷ Any requested stop

These requirements apply to all fixed-route bus and passenger rail service, including light rail, rapid bus service, and commuter rail.

- ▶ The Bus Operations Division does not know about or use the Public Notice required under the ADA (see [Section 3.2.6](#)).
- ▶ The Bus Operations Manual is unclear about what a driver should allow on a vehicle for customers with disabilities. The manual tells drivers to use their best judgment, which leads to inconsistency.
- ▶ Bus Operations personnel report that they can “suggest” leaving room for people with disabilities in the priority seating area but cannot enforce it. The Bus Operations Manual confirms it by saying:
  - ▷ “Service to a customer in a wheelchair may be refused only for the following reasons:
    - Wheelchair securement areas are occupied after making an attempt to clear the area.”

While this is true, an agency may establish its own mandatory-move policy requiring riders to vacate priority seats and wheelchair securement locations upon request. Adding signage that says, “This area is reserved for people using a mobility aid” would reduce confusion. FTA encourages agencies that establish such policies to inform all riders and post signs reflecting these policies adjacent to the priority seats and wheelchair securement areas.

- ▶ Section 5.02 of the Bus Operations Manual uses color coded cards indicating a person’s ability or inability to communicate. It has the following categories:
  - ▷ Yellow: Deaf and blind
  - ▷ White: Visual impairment with normal hearing
  - ▷ Pink: Verbal communication impairment
  - ▷ Orange: Limited English Proficiency (LEP)

There is no color for people who are only deaf, rather only those who are deaf and blind. A far higher percentage of people have hearing impairments than most other disabilities.

- ▶ The Bus Operations Manual indicates that a passenger can be denied service for wearing a leg bag. Section 5.2 states the following:
  - ▷ “Service to a customer in a wheelchair may be refused only for the following reasons:
    - Customers have human waste or other hazardous material visible on clothing/body.”

## **Possible Solutions**

- ▶ Update the Bus Operations Manual to comply with federal requirements and best practices. It is recommended that all best practices for services offered be implemented.
- ▶ Determine which divisions will track ADA-related issues and how information will be shared for consistency.
- ▶ Schedule ADA training specific to the Bus Operations Division's work to ensure an in-depth understanding of how their internal decisions affect the traveling public and inform them of the basics of the ADA.

### **Proposed Metrics**

- ▶ Metro should establish an ADA training program for all Bus Operations Division staff, track attendance, and request feedback from staff to determine the effectiveness of the training (e.g., all Bus Operations Division staff will receive training within the next two (2) years).
- ▶ Metro should establish a process for tracking public ADA-related issues and modification requests. Additionally, Metro should determine which divisions and staff are responsible for tracking the issues and requests.

### **3.3.3 MOBILITY DIVISION – CUSTOMER INFORMATION SECTION**

Metro's Mobility Division Customer Information Section follows procedures that ensure the prompt and fair resolution of ADA complaints while adhering to due process standards. All services provided use Salesforce programs to document the complaint investigation process. Effective communication is a top priority for the Strategic Communications and Engagement Division, which applies to all communication methods, including face-to-face interactions, multimedia, websites, telecommunications, written materials, and emergency communications.

### **Observations**

- ▶ The Customer Information Section records and manages complaints about individuals with disabilities. Such grievances are reported through the Customer Information office, assigned a unique case number, and then forwarded to the relevant Division for further investigation and resolution. However, Customer Information Section personnel do not receive any updates on the outcome of these cases from Access Operations.
- ▶ The Customer Information Section members have not received any specialized training on the ADA.
- ▶ The Customer Information Section lacks sufficient knowledge about the ADA's basic requirements and protections and how to assist customers or employees in utilizing these protections.
- ▶ The document GENR 0112 includes a paragraph regarding service animals. However, this paragraph is located within the Pet policy section, which may be unclear to customers. The paragraph initially refers to the allowance of only one "pet," followed by a paragraph about service animals. This could lead to misunderstandings, as only one service animal may be allowed.
  - ▷ The language used in GENR 0112 can be unclear since it refers to a "reasonable accommodation," an employment-related term.



- ▶ The Customer Information Section was unaware of the link containing all necessary information about Metro's commitment to the ADA.  
<https://kingcounty.gov/en/dept/metro/about/policies/ada>.
- ▶ Customers who need alternate formats go through the Customer Information Section and are transferred to the Access/Paratransit Section within the Mobility Division. The Access Section stated that alternate formats used to be available to customers online, but they could no longer find this information.
- ▶ No communication method is in place to inform various divisions or personnel of changes or updates that best serve riders with disabilities.

### **Possible Solutions**

- ▶ Provide follow-up process to share with the Customer Information Section knowledge of the resolutions to the complaints handled by all Sections. This would enable them to handle more calls without having to pass them along, which would help them serve the public better.
- ▶ Educate staff on properly using the customer comment process regarding people with disabilities. Additionally, staff should be informed about RCW 49.60.030, the Washington state law that provides freedom from discrimination.
  - ▷ Basic information about the ADA for both customers and employees should be included in Metro personnel's training.
- ▶ A better understanding of the Equal Employment Opportunity (EEO) complaint process can lead to fewer complaints. King County is launching The EEO Case Management Project, which aims to automate workflows for processing EEO, Equal Employment Opportunity Commission (EEOC), and ADA Title I and II complaints as per state and federal laws. By combining these processes, it will be easier to track resolutions and communicate policy changes.
- ▶ Adapt the document GENR 0112 to reference GENR 0110 for all service animal information as GENR 0110 comprehensively addresses service animals.
- ▶ If the GENR 0112 document is meant to be available to the public rather than just employees, it should use the term "reasonable modification." On the other hand, if the document is meant for employees and the public, it should use the term "reasonable accommodation/modification" since these are two different processes under the ADA.
- ▶ Create an ADA campaign to improve the level of information that Metro employees have about the progress made so far. This campaign can consist of a set of questions that employees can ask to identify customers' specific requirements. This will enable them to provide the appropriate solutions based on the services offered by Metro. The better-informed Metro staff is about such matters, the better equipped they will be to assist the public. The information provided can be arranged into a flow chart or process to help Customer Care determine how to meet the needs of riders with disabilities.
- ▶ Review the process for alternative formats. Providing the option for people to order alternative formats online could be a helpful solution. Alternatively, the current process could be simplified to minimize the need for customers to transfer between different departments to get their requests filled promptly and efficiently.



- ▶ Develop a process for communicating announcements or information regarding changes in policies and procedures that will benefit riders with disabilities. It would be ideal to have a dedicated section in the employee newsletter for service to customers with disabilities since it already reaches all King County employees. Although email blasts are a common option, studies show they are less effective.

### **Proposed Metrics**

- ▶ Metro should establish metrics for tracking and monitoring ADA Title I and Title II complaints, including their status and resolution, through the EEO Case Management project. Metro should make this information available to all relevant staff and divisions.
  - ▷ Metro should establish a goal timeframe for responding to and resolving complaints.
  - ▷ Metro should establish a goal percentage for complaint resolutions.
- ▶ Metro should establish an ADA training program for all Mobility Division – Customer Information Section staff, track attendance, and request feedback from staff to determine the effectiveness of the training (e.g., all Mobility Division – Customer Information Section staff will receive training within the next two (2) years).
- ▶ Metro should track the number of Bus Operator complaints received before and after the training to understand the effectiveness of the training.

### **3.3.4 MOBILITY DIVISION – SERVICE DEVELOPMENT SECTION**

Service Development is responsible for the planning, scheduling, and developing of bus stops and passenger facilities; RapidRide expansion; Sound Transit integration; and development of mid- and long-range plans. This includes the development of Service Guidelines and policies that guide the development, growth, and change of Metro services as well as the types of amenities that Metro provides at transit stops. Metro Service Development, using the Service Guidelines as policy guidance, focuses on bringing service and facility improvements to areas with needs, including areas of the county with higher relative proportions of BIPOC and people with disabilities. For bus stops, the group focuses on identifying non-accessible and limited accessible zones in these communities and prioritizing them. For service, extensive community engagement processes include work with community groups, mobility boards, and local government agencies to ensure that equity is prioritized in planning work.

### **Observations**

- ▶ Metro staff responsible for service planning and development do not fully understand the responsibilities and duties associated with the ADA coordinator role.
- ▶ Service Development personnel have not received specific training on the Americans with Disabilities Act (ADA). As a result, they have a limited understanding of the needs of individuals with disabilities and how to engage with them effectively for planning purposes.
- ▶ Service Development oversees the transit system by setting service guidelines and performance measures. This includes prioritizing service to priority populations, including riders with disabilities.



### **Possible Solutions**

- ▶ Provide all Service Development personnel with comprehensive ADA training. The training program should cover fundamental ADA information, disability etiquette, details on the initiatives taken by the Communications and Engagement Section within the General Manager's Office, and how the needs of people with disabilities can be incorporated into planning.
- ▶ Decide which divisions will be required to track ADA-related issues and the process for sharing information between divisions to ensure consistency.

### **Proposed Metrics**

- ▶ Metro should establish an ADA training program for all Mobility Division – Service Development staff, track attendance, and request feedback from staff to determine the effectiveness of the training (e.g., all Mobility Division – Service Development Section staff will receive training within the next two (2) years).
- ▶ Metro should establish a process for tracking public ADA-related issues and modification requests. Additionally, Metro should determine which divisions and staff are responsible for tracking the issues and requests.

## **3.3.5 TRANSIT FACILITIES DIVISION – FACILITIES MAINTENANCE SECTION**

Metro's Facilities Maintenance Section is responsible for maintaining accessible features in facilities in proper working conditions. Whenever accessibility features become damaged or out of order, it is mandatory to repair them promptly.

### **Observations**

- ▶ The Facilities Maintenance Section does not keep records of incidents involving people with disabilities or track requests for facility modifications to improve transit environments.
- ▶ The Facilities Maintenance Team has stated that they haven't received any training that is specific to ADA guidelines.
- ▶ As part of this project, plans were submitted for review. However, there is no specific process for accessibility review and inspection in these areas:
  - ▷ Parking improvements and updates
  - ▷ Accessibility equipment
  - ▷ Bus stops and bus zones
- ▶ The Metro Strategic Plan states that Metro must comply with federal laws to ensure an equitable, accessible, and just transportation system. However, without an organized effort to ensure accessibility to provided facilities, conformance is difficult to substantiate.
- ▶ The provided emergency plan is for vehicles only and does not include evacuation procedures for employees and citizens with disabilities in buildings or facilities.
- ▶ The Facilities Maintenance Section lacks a complete understanding of the fundamental requirements of the Americans with Disabilities Act (ADA), such as the Grievance

Process and related mandates. Additionally, they are not fully aware of what PSAs are available for their division.

- ▶ Facilities Maintenance has not developed a barrier removal plan.
- ▶ Facilities Maintenance staff rely on architects, engineers, and the ADA Coordinator to review project plans for accessibility. However, there is no internal verification process specifically for accessibility during project inspections once construction is complete.
- ▶ All Facilities Maintenance projects, including projects designed by third-party architectural and engineering firms, are required to undergo 30%, 60%, and 90% Internal Design Reviews, including Pre-Permit Application Reviews, with Milestone Checklists including checking for ADA conformance. During Construction, the authorized and certified construction documents are implemented by Metro's Project Representative, supported by the authorizing engineers and architects, internal and/or consultant. Metro expects all consultant-designed plans and specifications will meet current ADA standards.
- ▶ The list of leased facilities with bus stops provided lacks a process or checklist to ensure accessibility.
- ▶ The Facilities Maintenance Section follows the 2009 Manual on Uniform Traffic Control Devices (MUTCD) with revisions 1 and 2, which was last updated in 2012. However, revision 3 was implemented in 2022 and should be used instead. It's important to note that standards and codes may differ depending on the project's location, which may lead to inconsistencies across service areas.

### **Possible Solutions**

- ▶ Decide which divisions will be required to track ADA related issues and what the process will be to connect information between Divisions for consistency.
- ▶ Basic ADA training is necessary for all divisions, but Facilities Maintenance should have additional training on accessible facilities and developing a remediation program as a result of this Transition Plan process. A full understanding of where the division intersects with the public is necessary so maintenance items can be prioritized.
- ▶ Establish a divisional plan for implementation of the Transition Plan, development of the policy changes, and facility remediation.
- ▶ Several of the facilities on the building list provided are churches, which are exempt from ADA (though not exempt from Chapter 11 of the building code) and may not be accessible. A process should be developed (e.g., through the Transit Facilities Conditions Assessments Program or Paving Program) to ensure any facility Metro uses, whether owned or leased, is either in conformance with the ADA, or at least evaluated for conformance with the ADA so it can be added to the Transition Plan and brought into conformance.
- ▶ Metro should begin using the 2009 MUTCD with revisions 1, 2, and 3, which was updated in July 2022.

### **Proposed Metrics**

- ▶ Metro should establish a process for tracking public ADA-related issues and modification requests. Additionally, Metro should determine which divisions and staff are responsible for tracking the issues and requests.
- ▶ Metro should establish an ADA training program for all Transit Facilities Division staff, track attendance, and request feedback from staff to determine the effectiveness of the training (e.g., all Transit Facilities Division staff will receive training within the next two (2) years).
- ▶ Metro should develop a system to track each project in design and ensure it has been reviewed for ADA conformance at various project milestones.
- ▶ Metro should establish a database within the existing Transit Facilities Condition Assessment Program to track the status and progress of facility accessibility condition assessments over time. Metro should establish a timeframe in which all facilities will be assessed for accessibility conformance (e.g., evaluate 25% of all transit stops for conformance annually over the next four (4) years).
- ▶ Metro should establish a Barrier Removal Program database that tracks the progress of ADA deficiency removal projects. Metro should establish a timeframe in which all accessibility barriers will be removed (e.g., improve 5% of all transit stops annually over the next 20 years).

### **3.3.6 MOBILITY DIVISION – ACCESS PARATRANSIT SECTION (CONTRACTED/ON-DEMAND SERVICES)**

Metro's Mobility Division manages various contracted services, including Access paratransit service, DART, Community Access Transportation (CAT), JARC, and Metro Flex (on-demand) service. These services have different contracted service providers; the CAT program has numerous different providers. Of these services, Access and CAT are specifically designed to meet the needs of people with disabilities, and in the case of CAT programs, seniors without disabilities are also served. Metro's Access Service provides origin-to-destination paratransit service in King County in compliance with the requirements of §§ 37.123–37.133. Metro also provides Vanpool, Vanshare, and Community Van services provided by volunteer drivers, with Metro providing vehicles and other support.

The development of new and expanded contracted services requires coordination with community members, including the disability community and other stakeholders. Metro's process of engaging communities in the development of new innovative services, such as the expansion of Metro Flex on-demand service and piloting of Access on-demand service, is focused in this area.

When an ADA Title II entity contracts services out to another entity, it does not relieve it of its duty to conform to all ADA Title II requirements. All PSAs offered by a contracted provider to an ADA Title II entity must fully comply with all applicable facets of the ADA.

### **Observations**

- ▶ Metro has different agreements with different contract providers. While this is to be expected, there is an opportunity to insert a broad range of reviews and language that offers more consistency among contract providers.
- ▶ There is no standardized ADA training for contracted service providers and local government agencies.
- ▶ Some contracted service providers, local government agencies, and companies do not have standardized processes and procedures regarding staff minimum performance requirements. Metro has limited authority to review and address performance for unacceptable (or exceptional) employee behavior.
- ▶ Service animal policies differ among contracted service providers, local government agencies, and modes of transportation. More importantly, much of the decision-making is up to the operators, which leads to inconsistencies.
- ▶ Operators vary among contracted service providers and local government agencies. Some are subcontractors, some are volunteers, and some are non-profit agency staff. All are associated with Metro, and most carry the Metro brand with little consistency of policies and procedures or services related to accessibility.
- ▶ Contracted service providers provide approximately 2.5 million rides annually. Given the high number of riders, consistency is paramount to success. Additional planning is needed for the consistent treatment of riders with disabilities.
- ▶ A pilot program using the Metro Flex fleet, which is not owned by Metro, is scheduled to begin in 2024. The Consult Team has not seen the agreement or plan for this project.

### **Possible Solutions**

- ▶ Develop consistency between contracted service providers and direct contracted services system-wide. Metro needs to be able to provide input in releasing ineffective employees or those with poor behaviors or unacceptable communication. Additionally, Metro should develop policies and procedures and get buy in from service providers. Metro should review the various contracts and determine which policies and practices to keep and which to change. Doing so will promote consistency.
- ▶ When evaluating the contractual agreements noted above, Metro needs to maintain consistent approaches to hold contracted providers accountable for training and consistency of ADA conformance of non-Metro drivers, whether volunteers or employees of another organization.
- ▶ To ensure consistency, all contracted service providers should receive training on Metro policies, procedures, and practices.
- ▶ When ADA training is provided for contract service provider personnel, as noted above, it should include the basics of ADA and specific “operator” policy and procedure training to ensure consistency.

A summary of information related to Contracted Services is included in **Table 7**.



*[Remainder of page intentionally left blank]*

**Table 7: Summary of contracted services**

Questions	Access	DART	Vanpool	Metro Flex	Community Van	JARC	CAT
Metro branded service	Y	Y	Y	Y	Y	N	N
Driver status	Sub consult.	Sub consult.	Vol.	Sub consult.	Vol.	Non-profit agency staff	Non-profit agency staff
Driver oversight	MV	Hopelink	Metro	Via	Jurisdiction staff or Hopelink	Non-profit agency staff	Non-profit agency staff
Can metro fire/remove drivers*	N	N	Y	N	Y	N	N
Metro owned vehicles	Y/N	Y/N	Y	N	Y	Y	Y/N
Metro name on vehicle	Y	Y	Y	Y	Y	N	N
Accessible vehicles**	Y	Y	Y	Y	Y	N	Y
Driver training/orientation provided by Metro	N	N	Y	N	Y	N	N
Training program available to review	Y	Y	N	Y	Y	N	N
Contract available to review	Y	Y	N	Y	Y	Y	Y
Metro contact for service questions	Matthew Weidner	Don Okazaki	Victoria Tobin	Mitch Brown	Melissa Allan	Penny Lara	Don Okazaki

*Note1: Metro contracted providers are required to provide accessible services or options. Metro staff monitor service and contracts that can or do include driver training requirements.*

*Note2: Volunteer drivers must meet Metro driver requirements to qualify to operate a county vehicle.*

*\* Metro can only hire or fire internal employees. Metro has driver standards as part of all contracts. Employee disciplinary action rests with the employer (contractor or subcontractor).*

*\*\*Dart vehicles are accessible. Metro Access and other programs include both standard and accessible vehicles.*

### **Proposed Metrics**

- ▶ Metro should establish an ADA training program for all contract service providers and local agencies who work on Metro facilities, track attendance, and request feedback from staff to determine the effectiveness of the training (e.g., all contract service

providers and local agency staff who work on Metro facilities will receive training within the next two (2) years).

- ▶ Metro should establish metrics to track the performance of contracted service providers and local agency staff who interact with the public (e.g., all complaints or incidents that occur related to public interactions with contract service providers and local agency staff are tracked with the goal of reducing the total number of these complaints or incidents by 10% each year).

### **3.3.7 GENERAL SURVEY**

Several division representatives provided insight by answering the general survey. The following section includes follow-up discussions with these representatives regarding system-wide programmatic elements.

- ▶ Staff affected by the ADA often don't understand the role of the ADA Coordinator or basic requirements, such as the grievance process, auxiliary aids, and effective communication.
- ▶ It appears that there hasn't been any employee specific training on the Americans with Disabilities Act (ADA). This has resulted in a lack of awareness about the requirements and needs of people with different disabilities. As a result, there is a need for better understanding and outreach to this large demographic served by Metro.
- ▶ Currently, Metro does not have a deliberate system for collecting and using data from riders with disabilities. Metro needs to prioritize collecting and applying this information to ensure that all riders receive better and more consistent service.
- ▶ Consistent policies and practices should be maintained within and between divisions, providers (local government agencies and contracted service providers), and modes of transportation.
- ▶ According to the division representatives, it is commonly understood that the ADA service administrator should be contacted in case of any ADA issues or queries. However, no policy or system is in place to ensure uniformity in practice. Moreover, contracted service providers and local government agencies have their respective contacts for information and answers related to the ADA, leading to inconsistencies in the process.

#### **Possible Solutions**

- ▶ Form a small team or work group dedicated to accessibility. This team would coordinate with the ADA Coordinator, the newly developed EEO Case Management Project, and other agencies, promoting cohesion and sharing of data in various reports and dashboards.
- ▶ Develop comprehensive ADA training for employees. Conformance with the ADA is mandatory, and proper training on the ADA helps ensure that employees understand what is required to be in conformance. Achieving proficiency is highly recommended and a best practice. The training should be designed for all divisions, ensuring consistent information is provided to each one. Also, each division should receive training tailored to its specific roles and responsibilities. This training may include basic ADA information, specific disability etiquette, information about the Community Engagement group's activities, and how each division can participate.

- ▶ Ensure Metro's accessibility program is integrated system-wide, from leadership down to the staff. The program should cover the entire process from hiring to retirement to more effectively meet the needs of both customers and employees with disabilities. To achieve this, clear processes must be developed, and sufficient planning, training, and execution must be put in place. Best practices uncovered through interviews conducted with peer transit agencies and the Consult Team's experience working with state and local governments across the country have been documented in [Section 3.4](#).
- ▶ Determine which divisions are responsible for tracking ADA-related issues and establish a process for sharing information between them.
- ▶ The newly developed ADA team or work group should be charged and authorized to continue the facility assessments and create a plan for remediation.
- ▶ The new team or staff group responsible for ADA conformance should consistently ensure that all local government agencies, contracted service providers, and transportation modes report any disability-related issues. This will help establish cohesive policies and solutions.

### **Proposed Metrics**

- ▶ Metro should establish a general ADA training program for all staff, track attendance, and request feedback from staff to determine its effectiveness (e.g., all staff will receive the general ADA training within the next two (2) years).
- ▶ Metro should establish a process for tracking public ADA-related issues and modification requests. Additionally, Metro should determine which Divisions and staff are responsible for tracking the issues and requests.
- ▶ Metro should establish a database within the existing Transit Facilities Condition Assessment Program to track the status and progress of facility assessments over time. Metro should establish a timeframe in which all facilities will be assessed for accessibility conformance (e.g., evaluate 25% of all transit stops for conformance annually over the next four (4) years).
- ▶ Metro should establish a Barrier Removal Program database that tracks the progress of ADA deficiency removal projects. Metro should establish a timeframe in which all accessibility barriers will be removed (e.g., improve 5% of all transit stops annually over the next 20 years).



### **3.4 PEER AGENCY REVIEW AND RECOMMENDED ACTIONS**

As a part of its Transition Plan, Metro aimed to gain insights into how other similarly sized agencies dealt with their accessibility programs. The Consultant Team collaborated with Metro staff to conduct interviews with peer agencies. They selected five (5) agencies to be interviewed, developed specific questions, and initiated calls with them. Each agency was allotted a two-hour call to discuss its Transition Plan efforts. The information obtained from these calls was synthesized with the Consultant Team's experience working with other agencies to form the best practices described in this section.

- ▶ New Jersey Transit
- ▶ Capital Metro (Austin, TX)

- ▶ Chicago Transit Authority
- ▶ St. Louis Metro
- ▶ Los Angeles Metro

Questions were addressed on the following topics:

- ▶ General questions
- ▶ Employment
- ▶ Self-Evaluation process
- ▶ Planning
- ▶ Operations
- ▶ Communication and public engagement

#### BEST PRACTICE NUMBER 1:

**Good compliance starts with a “culture” developed by the leadership.** Most of the people contacted were passionate about accessibility, but they struggle to get support from agency leadership regarding money, time, or priority.

Capital Metro (CapMetro), in Austin, Texas, has implemented an excellent accessibility program for employees and riders with disabilities. This program was developed at the highest levels of leadership and has been implemented across all departments. In contrast, other agencies have struggled to meet just the basic requirements for disability access.

#### BEST PRACTICE NUMBER 2:

**Communication** – After reaching out to various entity representatives, it seems that most of them believe that they work in isolation and without support. However, when they communicate with other departments, they realize that adhering to the ADA is a shared value. Unfortunately, there is a lack of communication between departments regarding what actions need to be taken to comply with the ADA.

The key to success in ensuring accessibility within an agency is to have an ADA Coordinator who is passionate and confident about what needs to be done and is given the authority to make necessary changes. This can be achieved by reaching out to the leadership in other departments and consistently providing support, education, and guidance on ADA-related matters. By building this framework, access can be included in each process developed and construction project planned. This approach has proven to be very effective within the CapMetro structure.

The CapMetro ADA Coordinator is a person with a disability who leads with authority and passion, communicates effectively with all departments, and gets results. He is also the key contact for the ADA training provided to all departments within CapMetro and the employees of the companies that provide contracted services.

LA Metro developed tactile communication tools to help people with visual impairment with wayfinding. These tactile elements are placed on the ground at stations and indicate where the lines are for boarding a bus and other critical information to ensure a person with no vision can find their way to the correct bus.

### BEST PRACTICE NUMBER 3:

**Using the Transition Plan Information** – The Transition Plan is a tool to help organize conformance efforts and provide guidance toward resolutions. Like any tool, it's only as good as the use it gets. The intent is to have all conformance data in one place so that an agency can establish a usable baseline for planning and project development.

For instance, with the proper data collected and the Transition Plan being used as a living document, the necessary data is available each time a project is planned, indicating what barriers need to be removed. The plan can then include the removal of all barriers as part of the planned construction activity.

This is the process used by the Chicago Transit Authority (CTA), which has evaluated every stop and facility owned, maintained, and/or operated by CTA as part of the FTA's All Stations Accessible Program, a funding source for remediation.

### POTENTIAL METRICS TO SUPPORT TRANSITION PLAN IMPLEMENTATION:

Metro has developed a strategic plan (<https://kingcounty.gov/en/-/media/depts/metro/about/planning/pdf/2021-31/2021/metro-strategic-plan-111721>) which lays out 10 goals for the organization, along with measures to track successful implementation. Together with the information gained while completing the peer agency review for the ADA Transition Plan, potential measures to track progress were found. They are provided in **Table**.

*[Remainder of page intentionally left blank]*



**Table 8: Potential metrics to support transition plan implementation**

Measure	Justification	Source
Household Transportation Affordability	To determine the percentage of household budget dedicated to transportation services (low-income and/or disabled)	Evaluating Transportation Equity - <a href="#">Click Link</a>
Jobs Access	To determine the percentage of routes from disadvantaged communities to jobs in 45 minutes	Transit Equity Dashboard - <a href="#">Click Link</a>
Inaccessibility Index	To determine the portion of jobs, education, healthcare, and shopping areas in King County that cannot be reached by public transportation	Evaluating Transportation Equity - <a href="#">Click Link</a>
Transportation Food Access	To determine the percentage of households that can access groceries within 20 minutes without a car	Evaluating Transportation Equity - <a href="#">Click Link</a>
Hospital Access	To determine transit times to the nearest hospital	Transit Equity Dashboard - <a href="#">Click Link</a>
Leadership Inclusion	To determine the percentage of organization leadership from disability (or historically disadvantaged) community	Transit Equity Dashboard - <a href="#">Click Link</a>
ADA Fleet	To determine the percentage of the King County Metro fleet that is accessible	Transit Equity Dashboard - <a href="#">Click Link</a>
Segment Investment	To determine financial investments by population segment	Transportation Equity Toolkit - <a href="#">Click Link</a>
Inaccessible Stops	To determine the percentage of stops (and map location) lacking continuous sidewalk access from the surrounding community	Transportation Equity Toolkit - <a href="#">Click Link</a>
Emergency Evacuation	To determine travel time to emergency shelters	Transportation Equity Toolkit - <a href="#">Click Link</a>

## 4.0 FACILITIES EVALUATION



### 4.1 FACILITIES OVERVIEW

The following sections describe Metro's approach to evaluating physical facilities for conformance with current ADA standards and guidelines.

Metro serves King County, which includes the Seattle area, and owns or maintains many facilities. These include 35 transit centers / park-and-ride locations and approximately 6,800 transit stops. Of these facilities, six (6) parking garages serving transit centers or park-and-ride locations, 31 stand-alone transit stops, and 14 transit center or park-and-ride locations were selected to be evaluated for conformance with the ADA standards and best practices. These facilities were selected based on their lack of existing accessible elements, high level of pedestrian activity, and their proximity to pedestrian traffic generators. The specific facilities that were evaluated are detailed in the following subsections. Future phases of Metro's ADA Transition Plan will include evaluating all Metro-owned or Metro-maintained facilities to allow a comprehensive prioritization of findings and allocation of resources toward removing barriers.

Metro owns and operates transit routes and facilities across many jurisdictions and works with various local government agencies and contract providers. As described in [Chapter 3](#), policies and procedures should be developed to ensure consistency and clarify responsibility when working across jurisdictions or with various local government agencies and contract providers.

The following sections group observations and possible solutions to remove barriers at the evaluated facilities by facility type.

In reference to Metro's facilities within the public rights-of-way, the Federal Highway Administration (FHWA) has provided guidance on the ADA Transition Plan process in their "INFORMATION: ADA Transition Plans" memo dated June 27, 2019 (see [Appendix D](#)). While this memo specifically addresses state departments of transportation, FHWA also recommends this guidance for local municipalities and agencies until FHWA develops specific guidance for local organizations. The memo provides a checklist of elements to include in an ADA Transition Plan and other ADA requirements agencies must fulfill.

Items included in the FHWA checklist related to the public rights-of-way are:

- ▶ Inventory of Barriers (identification of physical obstacles)
  - ▷ Identify intersection information, including curb ramps and other associated accessibility elements.
  - ▷ Require an Action Plan to develop an inventory of sidewalks (slopes, obstructions, protruding objects, changes in level, etc.), signals (including accessible pedestrian signals), bus stops (bus pads), buildings, parking, rest areas (tourist areas, picnic areas, visitor centers, etc.), mixed-use trails, linkages to transit.
  - ▷ Discuss jurisdictional issues/responsibilities for sidewalks.
- ▶ Schedule
  - ▷ Commit to upgrading ADA elements identified in the inventory of barriers in the short term (planned capital improvement projects).
  - ▷ Prioritize curb ramps at walkways serving entities covered by the ADA.

- ▷ Include prioritization information, planning, and investments to eliminate other identified barriers over time.
- ▷ Dedicate resources to eliminate identified ADA deficiencies.
- ▶ Implementation Methods
  - ▷ Describe the methods that will be used to make the facilities accessible and include the governing standard (e.g., 2010 ADA Standards, 2011 PROWAG).

#### 4.1.1 PARKING GARAGES

Six (6) parking garages within Metro were evaluated. All garages included in the evaluation are listed in **Table 9** and shown on the map in [Appendix E](#).

*Table 9: Summary of evaluated parking garages*

Parking Garage	Address
1. Burien Park-and-Ride Garage	14900 4 <sup>th</sup> Ave SW
2. Eastgate Park-and-Ride Garage	14200 SE Eastgate Way
3. Issaquah Highlands Garage	1755 Highlands Dr NE
4. Overlake Garage	2578 152 <sup>nd</sup> Ave NE
5. Redmond Transit Center Garage	16201 NE 83 <sup>rd</sup> St
6. South Kirkland Park-and-Ride Garage	10610 NE 38 <sup>th</sup> PI

#### **Observations**

Areas evaluated for each garage included parking lots, accessible parking spaces, access aisles, accessible routes from the parking lot through the garage toward exits, signage, and other elements with associated accessibility requirements. Common issues identified include:

- ▶ Non-conforming accessible parking
  - ▷ Missing the required number of spaces
  - ▷ Non-conforming parking spaces and access aisles
    - Excessive cross slope
    - Obstructions greater than .25 inches elevation
- ▶ Non-conforming accessible routes
  - ▷ Excessive cross slope
  - ▷ Obstructions greater than .25 inches elevation
  - ▷ Non-conforming signage

The building facility reports provide a complete list of issues (see [Appendix F](#)).

#### **Possible Solutions**

- ▶ Provide additional accessible and van-accessible parking spaces where deficient
- ▶ Repave or relocate non-conforming accessible parking spaces and access aisles

- ▶ Remove or replace accessible parking signage that does not meet clearance requirements
- ▶ Install accessible parking signage where not present
- ▶ Remove and replace non-conforming pavement and sidewalk
- ▶ Remove obstructions or widen sidewalk to avoid obstructions in the accessible route

The building facility reports provide a complete list of possible solutions (see [Appendix F](#)).

#### 4.1.2 STANDALONE TRANSIT STOPS

Thirty-one (31) stand-alone transit stops, or stops not associated with a Transit Center or Park-and-Ride location, were evaluated. **Table 10** presents a complete list of these locations. Transit stops were selected based on their location in areas frequently used by individuals with disabilities and their status as having “limited accessibility” or “no lift.” Transit stop evaluations documented the conditions and measurements within the boarding areas and transit stop amenities.

In addition to physical barriers at each transit stop, access to each transit stop – and therefore the transit service – was also documented. Specifically, the presence of a sidewalk connecting the transit stop boarding and alighting area to the nearest public rights-of-way sidewalk or nearest cross street. In instances where construction of missing connections to the adjacent sidewalk network or cross street is outside of the control of Metro, Metro should partner with local government agencies to provide connections to each transit stop location.

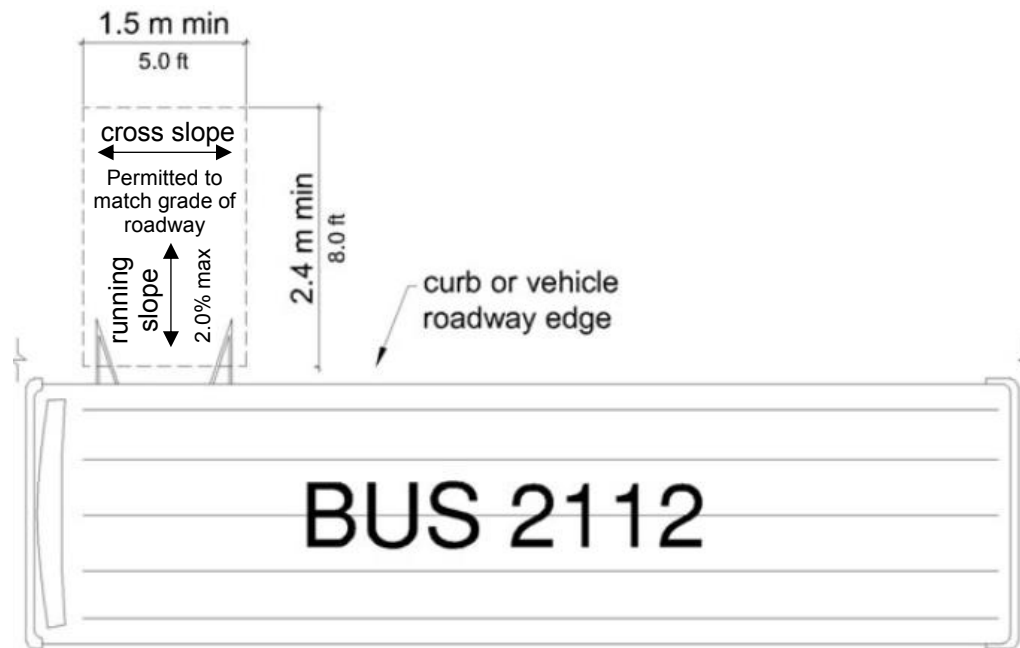
**Table 10: Evaluated “limited accessibility” or “no lift” transit stops**

Transit Stop ID	Transit Stop Location	Transit Stop ID	Transit Stop Location
12960	Disability Empowerment Center (EB)	50760	Multicultural Families
70440	National Federation of the Blind (North Side (NB))	80400	Factoria Blvd SE @ SE 40th PI (NB/FS)
80590	W James St @ 4th Ave N (EB/NS)	73813	Central Way @ 3rd St (EB/FS)
12496	Lighthouse for the Blind	12820	Disability Empowerment Center (WB)
70410	National Federation of the Blind (South Side (SB))	3770	14th Ave S @ S Holgate St (SB/FS)
60469	SE Kent-Kangley Rd @ 108th Ave SE (WB/FS)	48398	1st Ave S at SW 128th St (SB/NS)
58393	17th St SE @ H St SE (EB/FS)	80620	Central Ave N @ E James St (NB/FS)
11990	S Jackson St at 20th Ave S (EB/FS)	54150	NE 4th St @ Union Ave NE (WB/FS)
1530	Disability Rights WA	80765	The Arc of King County (NB)
70390	National Federation of the Blind (North Side (SB))	80763	The Arc of King County (SB)
70420	National Federation of the Blind (South Side (NB))	49571	SW 116th St @ 1st Ave S (EB/NS)
79590	SW Sunset Blvd at Oakesdale Ave SW (EB/FS)	49500	Military Rd S @ S 125th PI (NB/FS)
80666	The Arc of King County - Planter Strip Spot (South Side (NB))	77630	15th Ave NE @ NE 155th St (SB/FS)
80764	The Arc of King County - Planter Strip Spot (South Side (SB))	12373	DeafBlind Services Center
45440	87th Ave S @ S 115th PI (NB/NS)	47809	1st Ave S @ S 128th St (NB/NS)
57528	124th Ave SE @ SE 312th St (SB/FS)		

### **Observations**

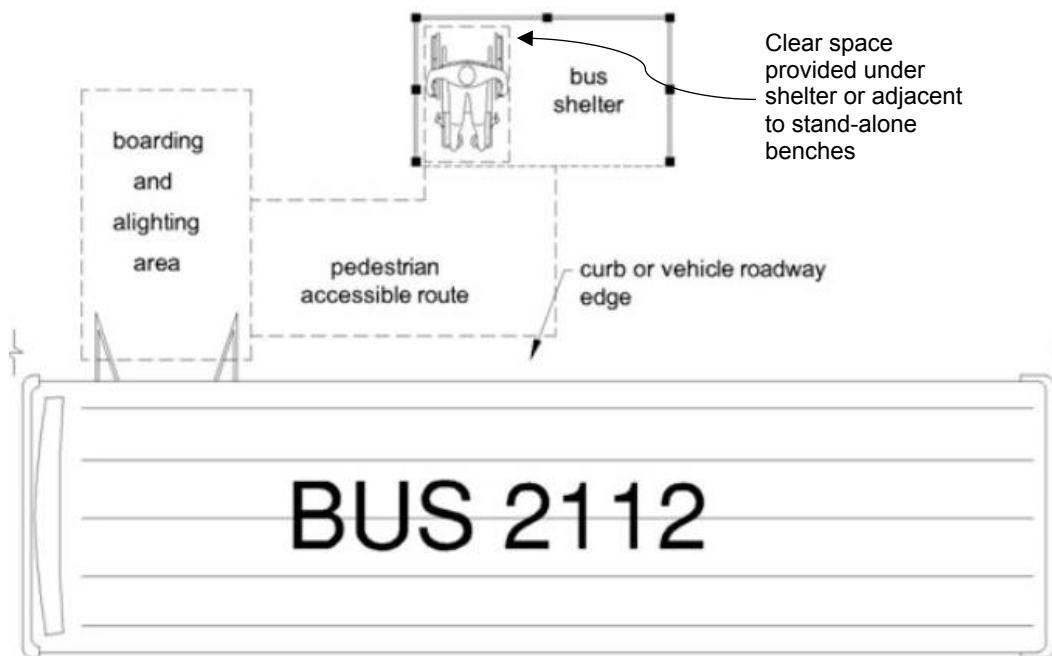
To provide access for all users and allow mobility assistance devices to be maneuvered without hindrance, PROWAG requires transit stop locations to include a boarding and alighting area that is a minimum of 8 feet long by 5 feet wide, does not exceed 2% slope in the direction of boarding the transit vehicle, and has no level changes greater than 0.25 inches or gaps greater than 0.5 inches. Where a shelter or stand-alone bench is provided, a clear space minimum of 4 feet long by 2.5 feet wide that does not exceed 2% slope is required. These requirements are provided in greater detail in [PROWAG section R308 Transit Stops and Transit Shelters](#).

**Figure 5: PROWAG requirements for transit stops – boarding and alighting areas**



Source: PROWAG Figure R308.1.3.2 Connection (Modified)

**FIGURE 6: PROWAG REQUIREMENTS FOR TRANSIT STOPS – CLEAR SPACES**



Source: PROWAG Figure R308.1.3.2 Connection (Modified)



Common issues at the evaluated Metro stand-alone transit stops included:

- ▶ Non-conforming transit stop signage
- ▶ No flush transitions at connections with the boarding area
- ▶ Excessive boarding area run slopes
- ▶ Insufficient boarding area lengths

A summary of the transit stop issues identified during the self-evaluation is found in **Table 11**.

**Table 11: Summary of issues at “limited accessibility” or “no lift” transit stops**

Transit Stop Element	Number Evaluated	Number Conforming	Percent Conforming
<b>Boarding and Alighting Area</b>			
Boarding and alighting area width $\geq 60"$	26	26	100%
Connection exists between boarding and alighting area and street or sidewalk network	26	26	100%
No temporary obstruction ( $>0.25"$ ) in boarding and alighting area	26	26	100%
No permanent obstruction ( $>0.25"$ ) in boarding and alighting area	26	24	92.3%
No ponding present in the boarding and alighting area	26	22	85.0%
Boarding and alighting area exists	31	26	83.9%
No heaving/sinking/cracking present in the boarding and alighting area	26	19	73.1%
Boarding and alighting area length $\geq 96"$	26	14	53.8%
Boarding and alighting area running slope $\leq 2\%$	26	14	53.8%
Flush transition at connection to the curb	26	11	42.3%
<b>Transit Stop Amenities</b>			
Transit stop signage is present	31	31	100%
Clear space is present under shelter	3	3	100%
Shelter clear space length is $\geq 48"$	3	3	100%
Shelter clear space width is $\geq 30"$	3	3	100%
Shelter opening clear width is $\geq 32"$	3	3	100%
Stand-alone bench clear space length is $\geq 48"$	3	3	100%
Stand-alone bench clear space width is $\geq 30"$	3	3	100%
Shelter clear space cross slope is $\leq 2\%$	3	2	66.7%
Clear space is present adjacent to stand-alone bench	5	3	60.0%
Shelter clear space running slope is $\leq 2\%$	3	1	33.3%
Stand-alone bench clear space running slope is $\leq 2\%$	3	1	33.3%
Stand-alone bench clear space cross slope is $\leq 2\%$	3	1	33.0%
Transit stop signage is conforming	31	0	0%

*Note: The number evaluated for each element corresponds to the total occurrences of that element. Of the 31 evaluated transit stops, 26 had boarding and alighting areas. There were three (3) transit shelters and clear space underneath each. There were five (5) stand-alone benches and clear space adjacent to the bench at three (3).*

Some transit stops do not have direct access from the nearest public sidewalk or cross street. Each location has unique requirements that need to be evaluated independently by Metro in collaboration with local government agencies.

- ▶ 87th Ave S @ S 115th PI (NB/NS)
- ▶ Military Rd S @ S 125th PI (NB/FS)
- ▶ SW Sunset Blvd at Oakesdale Ave SW (EB/FS)
- ▶ The Arc of King County - Planter Strip Spot (South Side (NB))
- ▶ The Arc of King County - Planter Strip Spot (South Side (SB))

Transit stop signage was assessed according to the guidelines outlined in PROWAG Section R410 Visual Characters on Signs. These guidelines ensure that the text on the signage is presented in a standard format that maximizes readability for people with low vision. The measurements for the transit stop signage were taken based on the standard template used by Metro for transit stop signage, as shown in the image below. These measurements were considered to be representative of all transit stop signage.

**FIGURE 7: STANDARD METRO TRANSIT SIGNAGE**



A few notable items affecting the transit stop signage include:

- ▶ Non-conforming character heights
- ▶ Non-conforming character spacing
- ▶ Non-conforming line spacing

A detailed summary of observations associated with the transit stops and the associated accessibility requirements are provided in [Appendix F](#).

### **Possible Solutions**

- ▶ Replace or relocate boarding and alighting areas
- ▶ Replace transit stop signage
- ▶ Install or replace clear spaces
- ▶ Relocate amenities
- ▶ Relocate transit stops

A complete list of possible solutions can be found in the transit stop reports provided in [Appendix F](#). If Metro updates the transit stop sign template, all text should meet the guidelines in PROWAG Section R410 Visual Characters on Signs.

### **4.1.3 TRANSIT CENTERS AND PARK-AND-RIDE LOCATIONS**

Fourteen (14) transit centers and park-and-ride facilities were evaluated. The evaluation included accessible parking spaces, transit stops, and the associated paths of travel that provide access from the parking area to the transit stops. In total 97 accessible parking spaces, 43 transit stops, 26 curb ramps, one (1) ramp, and roughly one (1) mile of sidewalk (accessible route) were evaluated. All locations in the evaluation are listed in **Table 12** and shown on the map in [Appendix E](#).

*Table 12: Summary of transit centers and park-and-rides reviewed*

Transit Centers and Park-and-Rides	Address
1. Auburn Park-and-Ride	101 15th St NE
2. Aurora Village TC Park-and-Ride	1524 N 200th St
3. Bear Creek Park-and-Ride	7760 178th PI NE
4. Bothell Park-and-Ride	10303 Woodinville Dr
5. Eastgate Transit Center	14200 SE Eastgate Way
6. Kent/Des Moines Park-and-Ride	23405 Military Rd S
7. Kent/James Street Park-and-Ride	902 W James St
8. Ober Park Park-and-Ride	17106 Vashon Hwy SW

9. Olson/Meyers Park-and-Ride	9000 Olson PI SW
10. Overlake Garage	2578 152nd Ave NE
11. South Kirkland Park-and-Ride Surface Lot	10610 NE 38th PI
12. Tukwila Park-and-Ride	13445 Interurban Ave S
13. Valley Center Park-and-Ride	20221 Vashon Hwy SW
14. Vashon North End Park-and-Ride	10915 103rd Ave SW

Common issues at the evaluated Metro transit centers and park-and-ride locations included:

- ▶ Non-conforming accessible parking
  - ▷ Missing required number of spaces
  - ▷ Non-conforming parking spaces and access aisles
    - Excessive cross slope
    - Obstructions greater than .25 inch elevation
- ▶ Non-conforming accessible routes
  - ▷ Excessive cross slope
  - ▷ Obstructions greater than .25 inch elevation
- ▶ Non-conforming transit stops
  - ▷ Excessive cross slope
  - ▷ Obstructions greater than .25 inch elevation
  - ▷ Non-conforming signage

More information about accessible parking, routes, and transit stops at the transit centers and park-and-ride locations is provided in the following sections.

### **Accessible Parking: Observations**

Ninety-seven (97) accessible parking spaces across 14 transit centers and park-and-ride locations were evaluated. The evaluations documented the conditions and measurements of the parking spaces, access aisles, and signage.

Out of the 14 locations, nine (9) have enough accessible parking spaces to meet or exceed the minimum required number. Similarly, five (5) locations have enough van accessible spaces to meet or exceed the minimum requirement. A summary of this information is provided in **Table 13**.

**Table 13: Summary of required accessible parking spaces**

Parking Area	Total Spaces in Area	Total Accessible Spaces Required in Area	Total Van Accessible Spaces Required in Area	Existing Accessible Spaces		
				Standard	Van*	Total
Auburn Park and Ride	244	7	2	5	1	6
Aurora Village TC Park-and-Ride	202	7	2	6	1	7
Bear Creek Park-and-Ride	283	7	2	6	2	8
Bothell Park-and-Ride	220	7	2	5	2	7
Eastgate Transit Center	183	6	1	7	4	11
Kent/Des Moines Park-and-Ride	404	9	2	6	2	8
Kent/James Street Park-and-Ride	713	12	3	16	2	18
Ober Park Park-and-Ride	48	2	1	1	1	2
Olson/Meyers Park-and-Ride	100	4	1	5	0	5
South Kirkland Park-and-Ride Surface Lot	331	8	2	12	0	12
Tukwila Park-and-Ride	255	7	2	5	0	5
Valley Center Park-and-Ride	55	3	1	2	0	2
Vashon North End Park-and-Ride	120	5	1	6	0	6

\*Van accessible parking spaces are required to be either: 1) 132 inches wide minimum with a 60-inch-wide minimum access aisle or 2) 96-inches wide minimum with a 96-inch-wide minimum access aisle. Van accessible parking spaces also must be designated by a sign that states "Van Accessible."

A summary of the status of existing accessible parking elements is provided in **Table 14**. Common issues within the accessible parking spaces included running and cross slopes greater than 2.0% (see **Figure 8**) vertical discontinuities greater than .25 inch (see **Figure 9**), and horizontal openings greater than .5 inch. Note, where the minimum required number of accessible parking spaces or van accessible spaces was not present in a lot, the parking spaces will need to be provided either by repaving or restriping existing spaces within the lot.



**Table 14: Summary of accessible parking conformance**

Accessible Parking Element	Number Evaluated	Number Conforming	Percent Conforming
Parking Space is served by an access aisle	97	95	98%
Parking Space width is $\geq 96$ inches	97	92	95%
Parking space does not have any horizontal openings $> .5$ inch	97	86	89%
Parking space does not have any vertical discontinuity $> .25$ inch	97	77	79%
Parking space cross slope is $\leq 2.0\%$	97	53	55%
Parking space running slope is $\leq 2.0\%$	97	40	41%



**Figure 8: Excessive slopes in parking area**





**Figure 9: Vertical discontinuities present in accessible parking space**

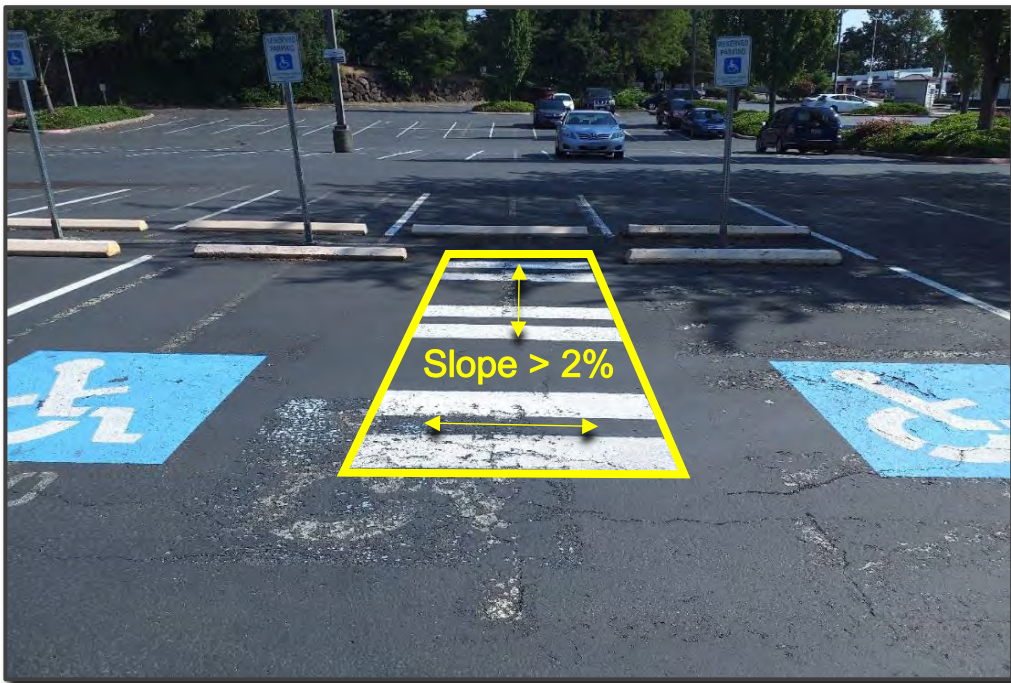
A summary of access aisle status is provided in **Table 15**. Common access aisle issues included running and cross slopes greater than 2.0% (see **Figure 10**), the access aisles not being marked to discourage parking (see **Figure 11**), and vertical discontinuities greater than .25 inch.

**Table 15: Summary of access aisle conformance**

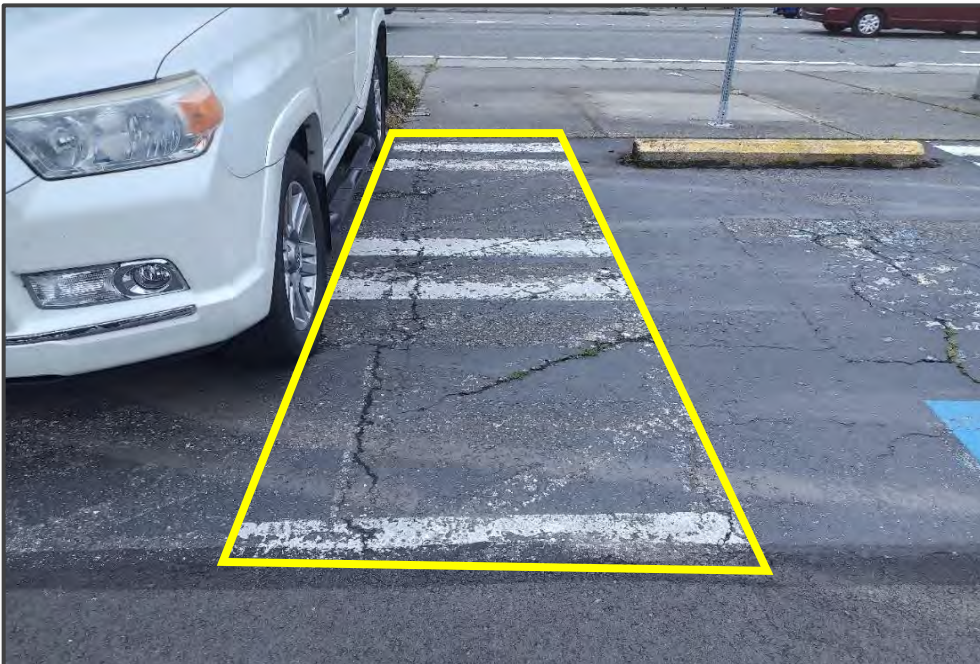
Access Aisle Element	Number Evaluated	Number Conforming	Percent Conforming
Constrained width where the access aisle adjoins the accessible route $\geq 36$ inches	53	52	98%
Access aisle adjoins the accessible route	57	53	93%
Access aisle does not have any horizontal openings $> .5$ inch	57	46	81%
Access aisle width is $\geq 60$ inches	57	45	79%
Access aisle does not have any vertical discontinuities $> .25$ inch	57	37	65%
Access aisle cross slope is $\leq 2.0\%$	57	31	54%
Access aisle is marked to discourage parking	57	30	53%
Access aisle running slope is $\leq 2.0\%$	57	27	47%



*Figure 10: Excessive slopes in the access aisle*



*Figure 11: Incorrect markings in access aisle*



### **Accessible Parking: Possible Solutions**

- ▶ Provide additional accessible and van accessible parking spaces where deficient
- ▶ Repave or relocate nonconforming accessible parking spaces and access aisles

A complete list of possible solutions can be found in the accessible parking report provided in [Appendix F](#).

### **Accessible Route: Observations**

The accessible route evaluations documented conditions and measurements along the pedestrian path of travel from the accessible parking to the transit stops. This includes the on-site sidewalk, curb ramps, pedestrian crossings at driveway openings, a standard ramp at Ober Park-and-Ride, and a signalized pedestrian crossing at Eastgate Transit Center. Approximately 1 (one) mile of accessible route sidewalk was evaluated. Maps of the evaluated accessible route sidewalks are provided in [Appendix E](#).

Some common issues were identified along the accessible route, such as excessive sidewalk cross-slopes and vertical surface discontinuities causing level changes. For instance, at Vashon North End Park-and-Ride, the only way to reach the ferry from the parking lot was via a staircase (see **Figure 12**). Therefore, an accessible route needs to be installed, including ramps and landing areas. Metro will coordinate with the responsible local agency to remove this barrier.

*Figure 12: Staircase at Vashon North End Park-And-Ride*





Common curb ramp issues along the accessible route included curb ramps having excessive landing cross slopes, no presence of detectable warning surfaces, excessive running and cross slopes, and excessive flare cross slopes. A summary of the curb ramp issues is provided in **Table 16**. Non-conforming curb ramps, sidewalk, and pedestrian paths of travel along driveways and street crossings should be removed and replaced. At Eastgate Transit Center the accessible route included a signalized pedestrian crossing to access Bay 4. **Table 17** provides a summary of the push button issues. A summary of issues for the standard ramp at Ober Park can be found in [Appendix F](#).

*Table 16: Summary of curb ramp issues*

Curb Ramp Element	Number Evaluated	Number Conforming	Percent Conforming
Curbed sides at 90°	18	18	100%
Curb ramp lands in crosswalk	22	22	100%
Curb ramp width $\geq 36"$	22	22	100%
Curb ramp turning space (landing) exists	22	22	100%
Detectable warning surface color contrasts with adjacent curb ramp surface	7	7	100%
Curb ramp present where curb ramp is needed	24	23	96%
Curb ramp counter slope $\leq 5\%$	22	21	95%
No ponding in curb ramp, turning space (landing), or flares	22	20	91%
No obstruction in curb ramp, turning space (landing), or flares	22	15	68%
Curb ramp does not have traversable sides	18	12	67%
Curb ramp turning space (landing) running slope $\leq 2\%$	22	14	64%
Flush transition to roadway exists	22	11	50%
Flare cross slope $\leq 10\%$	4	2	50%
Curb ramp running slope $\leq 8.3\%$	22	10	45%
Curb ramp cross slope $\leq 2\%$	22	10	45%
Presence of detectable warning surface	22	7	32%
Curb ramp turning space (landing) cross slope $\leq 2\%$	22	6	27%

**Table 17: Summary of push button issues**

Push Button Element	Number Evaluated	Number Conforming	Percent Conforming
Push button present where needed	2	2	100%
Push button offset from crosswalk $\leq 5'$	2	2	100%
Push button height $\leq 48"$	2	2	100%
Push button diameter 2"	2	2	100%
Push button reach range $> 10"$	2	2	100%
Pedestrian head present where needed	2	2	100%
Clear space is $\geq 30" \times 48"$	2	2	100%
Pedestrian push button sign exists	2	2	100%
Push button offset from curb $\leq 10'$	2	2	100%
Cross slope of the clear space $\leq 2\%$	2	1	50%
Push button orientation parallel to crossing	2	0	0%
Pedestrian push button sign is MUTCD approved	2	0	0%

### **Accessible Route: Possible Solutions**

- ▶ Remove and replace non-conforming pavement and sidewalk
- ▶ Remove obstructions or widen sidewalk to avoid obstructions in the accessible route
- ▶ Remove and replace non-conforming curb ramps and turning spaces
- ▶ Install detectable warning surfaces at curb ramps that otherwise conform with the requirements
- ▶ Reorient pedestrian push buttons to be parallel with pedestrian crossing and install signage consistent with MUTCD requirements

A complete list of possible solutions can be found in the sidewalk report provided in [Appendix E](#).

### **Transit Stops at Transit Centers and Park-and-Rides: Observations**

Forty-three (43) transit stops were evaluated at the transit centers and park-and-ride locations. A complete listing of these locations can be found on the maps in [Appendix E](#). Transit stop evaluations documented the conditions and measurements within the boarding areas and transit stop amenities. Common transit stop issues included non-conforming transit stop signage, excessive boarding area run slopes, excessive shelter clear space running and cross slopes, and no flush transition from boarding area to the curb. A summary of the transit stops issues identified during the self-evaluation is found in **Table 18**.

**Table 18: Summary of transit stop issues at the transit centers and park-and-ride locations**



Transit Stop Element	Number Evaluated	Number Conforming	Percent Conforming
<b>Boarding and Alighting Area</b>			
Boarding and alighting area length $\geq 96"$	43	43	100%
Boarding and alighting area width $\geq 60"$	43	43	100%
Connection exists between boarding and alighting area and street or sidewalk network	43	43	100%
Boarding and alighting area exists	43	43	100%
No ponding present in the boarding and alighting area	43	43	100%
No temporary obstruction ( $>0.25"$ ) in boarding and alighting area	43	43	100%
No permanent obstruction ( $>0.25"$ ) in boarding and alighting area	43	42	97.7%
No heaving/sinking/cracking present in the boarding and alighting area	43	37	86.0%
Flush transition at connection to the curb	43	35	81.4%
Boarding and alighting area running slope $\leq 2\%$	43	26	60.5%
<b>Transit Stop Amenities</b>			
Shelter opening clear width is $\geq 32"$	42	42	100%
Shelter clear space width is $\geq 30"$	40	40	100%
Transit stop signage is present	43	42	98.0%
Clear space is present under shelter	42	40	95.2%
Shelter clear space length is $\geq 48"$	40	38	95.0%
Shelter clear space running slope is $\leq 2\%$	40	28	70.0%
Shelter clear space cross slope is $\leq 2\%$	40	26	65.0%
Transit stop signage conforms with requirements	43	0	0%

### **Transit Stops at the Transit Centers and Park-and-Rides: Possible Solutions**

- ▶ Replace or relocate boarding and alighting areas
- ▶ Replace transit stop signage
- ▶ Install or replace clear spaces
- ▶ Relocate amenities
- ▶ Relocate transit stops

A complete list of possible solutions can be found in the transit stop reports provided in [Appendix F](#).



## 4.2 MAINTENANCE VERSUS ALTERATIONS

The United States Department of Justice (DOJ) has issued a briefing memorandum clarifying maintenance versus alteration projects. Information contained in the briefing memorandum is below. The Consultation Team recommends this clarification on when curb ramp installation is required be distributed to the appropriate Metro staff.



*The Americans with Disabilities Act of 1990 (ADA) is a civil rights statute prohibiting discrimination against persons with disabilities in all aspects of life, including transportation, based on regulations promulgated by the United States Department of Justice (DOJ). DOJ's regulations require accessible planning, design, and construction to integrate people with disabilities into mainstream society. Further, these laws require that public entities responsible for operating and maintaining the public rights-of-way do not discriminate in their programs and activities against persons with disabilities. FHWA's ADA program implements the DOJ regulations through delegated authority to ensure that pedestrians with disabilities have the opportunity to use the transportation system's pedestrian facilities in an accessible and safe manner.*

*FHWA and DOJ met in March 2012 and March 2013 to clarify guidance on the ADA's requirements for constructing curb ramps on resurfacing projects. Projects deemed to be alterations must include curb ramps within the scope of the project.*

*This clarification provides a single Federal policy that identifies specific asphalt and concrete-pavement repair treatments that are considered to be alterations – requiring installation of curb ramps within the scope of the project – and those that are considered to be maintenance, which do not require curb ramps at the time of the improvement. **Figure 13** provides a summary of the types of projects that fall within maintenance versus alterations.*

*This approach clearly identifies the types of structural treatments that both DOJ and FHWA agree require curb ramps (when there is a pedestrian walkway with a prepared surface for pedestrian use and a curb, elevation, or other barrier between the street and the walkway) and furthers the goal of the ADA to provide increased accessibility to the public right-of-way for persons with disabilities. This single Federal policy will provide for increased consistency and improved enforcement.*

*Figure 13: DOJ example projects*

ADA Maintenance and Alterations	
 <p><b>ADA Maintenance:</b></p> <ul style="list-style-type: none"> <li>• Crack Filling and Sealing</li> <li>• Surface Sealing</li> <li>• Chip Seals</li> <li>• Slurry Seals</li> <li>• Fog Seals</li> <li>• Scrub</li> <li>• Joint Crack Seals</li> <li>• Joint Repairs</li> <li>• Dowel Bar Retrofit</li> <li>• Spot High-Friction Treatments</li> <li>• Diamond Grinding</li> <li>• Pavement Patching</li> </ul>	 <p><b>ADA Alteration:</b></p> <ul style="list-style-type: none"> <li>• Mill &amp; Fill/Mill &amp; Overlay</li> <li>• Hot In-Place Recycling</li> <li>• Microsurfacing/Thin Lift Overlay</li> <li>• Addition of New Layer of Asphalt</li> <li>• Asphalt and Concrete</li> <li>• Rehabilitation and Reconstruction</li> <li>• New Construction</li> </ul>

Source: DOJ Briefing Memorandum on Maintenance versus Alteration Projects



## 4.3 PRIORITIZATION OF IMPROVEMENTS

The Consultant Team was tasked with developing a method for prioritizing improvements at transit stops. The prioritization criteria used for the evaluated Metro facilities followed a similar approach taken in previous ADA Transition Plans for transit agencies and state and local governments. The following sections outline the prioritization factors and results of the prioritization for parking garages, transit stops, and transit centers or park-and-ride locations. Each facility type has a different set of parameters to establish the improvement prioritization. These prioritization factors were taken into consideration when developing the implementation plan for the proposed improvements.

To determine the priority for each facility, the raw data for each accessibility element was compared to the criteria in **Tables 19-22**. Starting at Priority 1, data for an element was reviewed to see if the prioritization criteria applied. If yes, the facility was assigned a priority of 1. If no, the data was compared to the criteria in Priority 2 to determine if any of the criteria apply. This process was repeated until a priority was assigned to all evaluated facilities. The Consultant Team developed this prioritization methodology to aid Metro in determining how each facility should be prioritized for improvements based on the severity of non-conformance with current ADA standards, best practices, proximity to pedestrian attractors, and DOJ priority levels. The standards and guidelines used in developing this prioritization are described in [Section 1.5 New Construction and Alterations](#).

#### 4.3.1 PRIORITIZATION FACTORS FOR EVALUATED PARKING GARAGES, TRANSIT STOPS, AND TRANSIT CENTER OR PARK-AND-RIDE LOCATIONS

Parking garages were prioritized on a 12-point scale, which is defined in **Table 19**.

Transit stops were prioritized on a 5-point scale, which is defined in **Table 20**. Transit stop projects may be further prioritized using additional metrics such as ridership, equity and social justice metrics, proximity to community assets, alignment with strategic initiatives, and community feedback.

Signalized and unsignalized intersections along the path of travel within transit centers and park-and-ride locations were prioritized on a 13-point scale which is defined in **Table 21**.

The pedestrian paths of travel within transit centers and park-and-ride locations, described as sidewalk corridors, were prioritized on a 3-point scale and were given a priority of either “High,” “Medium,” or “Low” based on the severity of non-conformance with current ADA standards and best practices, which is defined in **Table 22**. Segments of the sidewalk corridor that conform with the current ADA standards and best practices were given a priority label of “Compliant.”

At transit center and park-and-ride locations, various combinations of the following elements exist:

- ▶ Transit stops (see **Table 20**)
- ▶ Accessible parking spaces, access aisles, and signage (all parking is assumed to be high priority)
- ▶ Intersections that include curb ramps, signalized intersection equipment, and pedestrian crossings (see **Table 21**)
- ▶ Accessible routes (see **Table 22**)
- ▶ Standard ramps (all standard ramps are assumed to be high priority)

Priority has been assigned to all elements listed. Unassigned elements are assumed high priority.

The Transition Plan development process follows a prioritization methodology that takes into account various factors. These factors include the severity of non-conformance with accessibility requirements, proximity to pedestrian attractors, and DOJ priorities. In addition, Metro will also consider its standard factors in prioritizing transit capital projects, including areas of greatest needs such as prioritized populations, ridership, areas with an increased number of people with disabilities, and input from bus operators, local jurisdictions, and the public. Additional criteria for consideration in determining when improvements will be implemented include currently planned capital projects and funding.

**Table 19: Prioritization factors for parking garages**

Priority	Criteria
<b>1 (high)</b>	Complaint known or safety concern
<b>2 (high)</b>	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 another pedestrian attractor.
<b>3 (high)</b>	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 another pedestrian attractor.
<b>4 (high)</b>	Barriers with parking or exterior conditions (DOJ level 1) – moderately out of conformance
<b>5 (medium)</b>	Barriers with access to goods and services (DOJ level 2) – severely out of conformance
<b>6 (medium)</b>	Barriers with: sccess to goods and services (DOJ level 2) – moderately out of conformance; OR parking or exterior conditions (DOJ level 1) – minimally out of conformance; OR restrooms (DOJ level 3) – severely out of conformance
<b>7 (medium)</b>	Barriers with: access to goods and services (DOJ level 2) – minimally out of conformance; restrooms (DOJ level 3) – moderately out of conformance; OR drinking fountains or public phones (DOJ level 4 & 5) – severely out of conformance
<b>8 (medium)</b>	Barriers with drinking fountains or public phones (DOJ level 4 & 5) - moderately out of conformance
<b>9 (low)</b>	Barriers with restrooms (DOJ level 3) – minimally out of conformance
<b>10 (low)</b>	Barriers with drinking fountains or public phones (DOJ level 4 & 5) - minimally out of conformance
<b>11 (low)</b>	Client is a Title II agency; AND elements out of conformance, 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
<b>12 (low)</b>	Element is fully conforming with an older standard (safe-harbored), but will need to be brought into conformance with current standards if altered

**Table 20: Prioritization factors for transit stops**

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



**Table 21: Prioritization factors for signalized and unsignalized intersections**

Priority	Criteria
<b>1 (high)</b>	Complaint filed on curb ramp or intersection
<b>2 (high)</b>	Existing curb ramp with any of the following conditions: Running slope > 12% Cross slope > 7% Obstruction to or in the curb ramp or landing Level change > .25 inch at the bottom of the curb ramp No detectable warnings AND within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
<b>3 (high)</b>	No curb ramp where sidewalk or pedestrian path exists AND within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
<b>4 (high)</b>	No curb ramps, but striped crosswalk exists
<b>5 (medium)</b>	Existing curb ramp with any of the following conditions: Running slope > 12% Cross slope > 7% Obstruction to or in the curb ramp or landing Level change > .25 inch at the bottom of the curb ramp No detectable warnings AND NOT within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
<b>6 (medium)</b>	No curb ramp where sidewalk or pedestrian path exists AND NOT within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
<b>7 (medium)</b>	Existing diagonal curb ramp (serving both crossing directions on the corner) is non-conforming and should be replaced with two curb ramps, one serving each crossing direction on the corner.
<b>8 (medium)</b>	Existing curb ramp with any of the following conditions: Cross slope > 5% Width < 36 inches Median/island crossings that are inaccessible
<b>9 (low)</b>	Existing curb ramp with either running slope between 8.3% and 11.9% or insufficient turning space
<b>10 (low)</b>	Existing diagonal curb ramp without a 48-inch extension into the crosswalk
<b>11 (low)</b>	Existing pedestrian push button is not accessible from the sidewalk and/or curb ramp
<b>12 (low)</b>	Existing curb ramp with returned curbs where pedestrian travel across the curb is not protected
<b>13 (low)</b>	All other intersections not prioritized above

**Table 22. Prioritization factors for sidewalk (accessible route)**

Criteria	Priority 1 (high)	Priority 2 (medium)	Priority 3 (low)
Cross slope of sidewalk is greater than 2%	Value > 3.5%	3.5% ≥ Value > 2.0%	
Width of sidewalk is less than 36 inches	Value ≤ 36.0"		
Obstruction present along sidewalk	Obstruction - Permanent	Obstruction - Temporary	
Heaving, sinking, or cracking present on sidewalk	Heaving Sinking Cracking		
Ponding on sidewalk		Ponding	
Missing sidewalk			Missing Sidewalk
Signalized cross street cross slope is greater than 5%	Value > 9.0%	9.0% ≥ Value ≥ 7.0%	7.0% > Value > 5.0%
Unsignalized cross street cross slope is greater than 2%	Value > 6.0%	6.0% ≥ Value ≥ 4.0%	4.0% > Value > 2.0%
Cross street running slope is greater than 5%	Value > 7.0%	7.0% ≥ Value ≥ 6.0%	6.0% > Value > 5.0%
Driveway sidewalk width is less than 48 inches	Value ≤ 36.0"	36.0" < Value < 42.0"	42.0" < Value < 48.0"
Driveway (or sidewalk if applicable) cross slope is greater than 2%	Value > 6.0%	6.0% ≥ Value ≥ 4.0%	4.0% > Value > 2.0%
Driveway (or sidewalk if applicable) condition is poor or poor dangerous	Elevation change greater than .5 inch or gaps greater than 1 inch	Elevation change between .25 inch and .5 inch or gaps between .5 inch and 1 inch	

**Tables 23-27** provide summaries of the prioritization classifications for stand-alone transit stops, transit stops at transit facilities, signalized intersections, sidewalks, and unsignalized intersections, respectively.

**Table 23: Prioritization summary for standalone transit stops**

Priority	Number of Transit Stops
0 (conforming)	0
1 (high)	12
2 (high)	12
3 (medium)	0
4 (medium)	7
5 (low)	0
<b>Total</b>	<b>31</b>

**Table 24: Prioritization summary for transit stops at transit centers and park-and-rides**

Priority	Number of Transit Stops
0 (conforming)	0
1 (high)	6
2 (high)	7
3 (medium)	1
4 (medium)	29
5 (low)	0
<b>Total</b>	<b>43</b>

*[Remainder of page intentionally left blank]*

**Table 25: Prioritization summary for signalized intersections**

Priority	Number of Intersections
0 (conforming)	0
1 (high)	0
2 (high)	1
3 (high)	0
4 (high)	0
5 (medium)	0
6 (medium)	0
7 (medium)	0
8 (medium)	0
9 (low)	0
10 (low)	0
11 (low)	0
12 (low)	0
13 (low)	0
<b>Total</b>	<b>1</b>

**Table 26: Prioritization summary for accessible route sidewalks**

Line type	Length (miles) by Priority				
	1 (high)	2 (medium)	3 (low)	Conforming	Total
Sidewalks	0.09	0.13	0.11	0.43	<b>0.77</b>
Driveways	0.01	0.00	0.01	0.01	<b>0.03</b>
Cross Streets	0.00	0.01	0.03	0.02	<b>0.05</b>
<b>Total</b>	<b>0.10</b>	<b>0.14</b>	<b>0.16</b>	<b>0.46</b>	<b>0.86</b>

**Table 27: Prioritization summary for unsignalized intersections**

Priority	Number of Intersections
0 (compliant)	0
1 (high)	0
2 (high)	11
3 (high)	1
4 (high)	0
5 (medium)	0
6 (medium)	0
7 (medium)	0
8 (medium)	0
9 (low)	1
10 (low)	0
11 (low)	0
12 (low)	0
13 (low)	1
<b>Total</b>	<b>14</b>



#### 4.4 FACILITIES EVALUATION SUMMARY

In developing the Transition Plan, a sample of Metro's facilities was reviewed for conformance with ADA guidelines. Future facility evaluations including the remaining Metro parking garages, transit centers, park-and-ride locations, and almost 7,000 stops, will be completed to allow Metro to have a comprehensive ADA Transition Plan, apply uniform prioritization for non-conforming facilities, and develop a long-term plan for improvements.

Evaluations were conducted on the following facilities:

- ▶ 6 parking garages
- ▶ 31 stand-alone transit stops
- ▶ 14 transit centers and park-and-rides containing the following elements:
  - ▷ approximately 1 (one) mile of sidewalk (accessible route)
  - ▷ 97 accessible parking spaces
  - ▷ 43 transit stops
  - ▷ 26 curb ramps
  - ▷ 1 standard ramp
  - ▷ 1 signalized pedestrian crossing

Metro will continue to look for and remedy barriers to access to ensure that all King County citizens have access to Metro's PSAs.

To confirm follow-up on corrective actions required under the Transition Plan, Metro will institute an implementation schedule to remove barriers identified in the ADA Transition Plan and document efforts toward conformance with the ADA.

The ADA Transition Plan implementation schedule will be updated annually and will be available upon request. To support the development of the implementation schedule, an ADA Action Log detailing the accessibility barriers at evaluated facilities is provided in [Appendix G](#).

*[Remainder of page intentionally left blank]*



## 5.0 FACILITY COSTS



### 5.1 FACILITIES COST PROJECTION METHODOLOGY

The Consultant Team was tasked with developing planning-level cost projection summaries for recommended accessibility improvements. The cost projection summaries for the facilities evaluated were developed for each facility type. To develop these summaries, recent bid tabulations from Washington Department of Transportation (WSDOT) construction projects, along with Consultant Team's experience with similar types of projects, were the basis for the unit prices used to calculate the initial planning-level cost projections for improvements. 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 2023 dollars. The costing methodology is described in greater detail in the Cost Projection Tech Memo included in [Appendix H](#).

It is important to note that the facility cost projection summaries only include the costs to remediate accessibility conformance issues as determined by a visual inspection of the facilities. Additional budget considerations should be given to the following:

- ▶ Comprehensive remodels or upgrades of outdated facilities that address more than accessibility conformance issues
- ▶ Current market conditions that may affect pricing of construction materials and labor
- ▶ Construction challenges not visible during the inspection, such as underground or in-wall utilities
- ▶ Typical Metro project execution
- ▶ Other factors that may affect costs

Metro should seek the assistance of a design professional to determine the best overall design solutions for a facility. This will ensure that various factors, such as existing conditions, available construction budget, and non-conforming elements in a particular area, are taken into consideration.

Using the initial planning-level ADA improvements cost projection summaries, Metro provided internal cost estimation guidelines to account for implementing various design and construction tasks to reflect the remediation and project execution costs more accurately based on Metro's past experiences. The cost estimation guidelines recommended include various internal costs typical of Metro staff's experience. Other costs included Metro-specific construction markups and contractor costs as well as an additional construction contingency (10%) and additional overall project contingency (30%). These additional costs have been used to translate the initial planning-level ADA improvement costs into an estimated "total project" cost to bring each facility into conformance, which is summarized in **Table 28**.

**Table 28: Planning-level facility cost projections for improvements**

Facility Type	Number	Total*
Parking Garages	6	\$2,000,000 - \$2,500,000
Standalone Transit Stops	31	\$450,000 – \$550,000
Transit Centers and Park-and-Rides	14	\$6,500,000 - \$7,000,000
<b>Metro Totals</b>	<b>51</b>	<b>\$8,950,000 - \$10,050,000</b>

\*Table values are rounded for simplification

Providing meaningful planning level cost projections for the planning, design, and delivery of accessibility projects is a challenge. In most cases, the accessibility improvements will be elements of larger projects that are designed and delivered by Metro or by Metro's partner jurisdictions. An example is the Metro Bus Stops Improvements Program. In limited cases, Metro designs and constructs these improvements as a single bus stop project. However, most bus stops are improved through larger projects led by Metro or its partners. Furthermore, designing improvements to the maximum extent feasible impacts the scope and costs of improvements.



## 5.2 IMPLEMENTATION

Six transit capital programs are the primary sources that will be used to fund the implementation of ADA accessibility improvements at transit facilities that have already been planned for change or upgrade prior to the ADA Transition Plan. These ongoing programs with 10-year cash flows plan, design, and construct improvements annually. **Table 29** lists these programs and cash flows.

**Table 29: Transit capital programs**

Program	ADA Accessibility Focused Elements
Bus Stop Improvements	New and upgraded bus stops
RapidRide	New bus stops on 50 miles of BRT corridors
Routine Paving Replacement	Parking lots and the access to bus stops
Transit Speed and Reliability Corridor Projects	Right-of-way improvements that support transit corridors
Transit Hubs	Right-of-way, transit improvements at major transfer locations
Access to Transit	Sidewalks/pathway access to transit facilities

If necessary, the CIP budget narratives and justifications will be updated to include improving accessibility as a key element of these programs. A newly established ADA/504 team needs to work with program managers to create a system for identifying and tracking ADA accessibility elements. This ADA/504 team is described in the next steps identified in [Chapter 6](#).



## 6.0 NEXT STEPS

Metro will begin internal coordination to address the programmatic and physical barriers identified in the Transition Plan. Major actions to be completed are described below.

The Transition Plan will be regularly updated to update and track the status of Metro programs, services, activities, and facilities and to document efforts to achieve conformance with ADA requirements.

- ▶ Suggested steps for advancing Metro's agency-wide Transition Plan work include:
  - ▷ Create a new project manager position in the Metro General Manager's Office responsible for the planning and implementation of the legal and civil rights recommendations of the plan. These recommendations include:
    - Create a uniform accessibility policy for all Metro divisions and contracted service providers across the entire system.
    - Create agency-wide and division or section-specific ADA training to ensure staff know their responsibilities regarding ADA conformance.
    - Review current resources, roles, and responsibilities regarding ADA accessibility.
  - ▷ Include ADA policy and program in the onboarding of new staff.
  - ▷ Review staffing needs to review partner projects for ADA conformance.
  - ▷ Regularly engage the disability community for feedback on plans to reduce barriers to programs and services.
  - ▷ Conduct a comprehensive analysis of Metro's website, including all interactive components and applications.
  - ▷ Ensure metrics are developed and shared in a system-wide process for implementing long-term accessibility barrier removal based on collected data.
  - ▷ Decide which divisions are required to track ADA-related issues and the process for sharing information between divisions to ensure consistency.
  - ▷ Transform the contracted services program into a collaborative partnership with Metro, sharing policies and practices and overseeing the training program and overall success.
    - Improve policies and relationships with contract service providers for consistent service across the system.
  - ▷ Appoint an ADA Team consisting of representatives from the Mobility and Capital Divisions to develop a multi-year plan to remove physical barriers at Metro bus stops and facilities. This work will include:
    - Within each biennial budget, Metro will assess accessibility priorities for facilities and consider including projects in the Metro Transit Capital Improvements list.
    - Ensure all facilities are reviewed, and a baseline is established for future projects to succeed.
      - Develop a system to assess the accessibility of all bus stops, park-and-ride facilities, transit centers, and related amenities. This

system should prioritize the necessary changes to ensure conformance with the Department of Justice's transition plan process. By ensuring these ongoing evaluations, Metro can keep the Transition Plan up-to-date and meet all requirements.

- Ensure that accessibility requirements are incorporated into all planning and construction projects by conducting thorough reviews.
  - Confirm engineer design support with Metro Plans Review (ADA/504) team to review plans from jurisdictions and developers.
  - Provide additional standard comments regarding ADA design standards to reviews of plans from external partners.
  - Have the Office of Plans Review inform partners of these standard notes and requirements.
  - Provide confirmation of meeting ADA design guidelines at project inspection.
- Integrate ADA accessibility and removal of barriers in all phases of projects.
- Document Metro Transit policy on bus stop amenities.
- ▷ Improve coordination between the ADA Coordinator, the ADA Implementation Team, and the newly developed EEO Case Management Project. The goal is to integrate ADA Title II and VI into the workflow, which will ensure consistency throughout the agency and facilitate sharing of data in reports and dashboards.

## **APPENDIX**

### **Appendix A: Equity and Social Justice Engagement Summary**

*Online Open House and Survey Responses*

*Promotional Materials*

*Online Open House Website Summary*

*Community-Based Organizations List*

*Stakeholder Guide*

### **Appendix B: Programs, Services, and Activities Division Survey and Interview Summary of Questions and Responses**

### **Appendix C: Grievance Procedure and Form**

*Title II Grievance Form*

### **Appendix D: Federal Highway Administration ADA Transition Plans Memo**

### **Appendix E: Evaluated Facility Maps**

*Parking Garages*

*Transit Stops*

*Transit Centers and Park-and-Ride Locations*

### **Appendix F: Facility Reports**

*Parking Garages*

*Transit Stops*

*Transit Centers and Park-and-Ride Locations*

### **Appendix G: ADA Action Log**

### **Appendix H: Cost Projection Tech Memo**

### **Appendix I: Summary of 30-Day Public Comment on Transition Plan Final Draft.**