



CITY OF BROWNSVILLE TENNESSEE
Americans with Disabilities Act
Self-Evaluation and
Transition Plan
May 2020

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ENGINEERS · ARCHITECTS · PLANNERS

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List of Abbreviations/Acronyms

AA – Affirmative Action
AASHTO – American Association of State Highway and Transportation Officials
ABA – Architectural Barriers Act of 1968
ADA – Americans with Disabilities Act of 1990
ADAAG – Americans with Disabilities Act Accessibility Guidelines
CDBG – Community Development Block Grant
CFR – Code of Federal Regulations
DOJ – U.S. Department of Justice
DOT – U.S. Department of Transportation
EEOC – Equal Employment Opportunity Commission
EMS – Emergency Medical Services
FHWA – U.S. DOT Federal Highway Administration
FTA – U.S. DOT Federal Transit Administration
GIS – Geographic Information System
HR – Human Resources Department
HTML - Hyper Text Markup Language
ISA – International Symbol of Accessibility
IT – Information Technology Department
NCA – National Center on Accessibility
PDF – Portable Document Format
PROWAG – Public Rights-of-Way Accessibility Guidelines
RA – Rehabilitation Act of 1973
ROW – Right-of-Way
RTF – Rich Text Format
SETP – Self-Evaluation and Transition Plan
TDD – Telecommunications Devices for Deaf Persons
TDOT – Tennessee Department of Transportation
TTY – Teletypewriter
UFAS – Uniform Federal Accessibility Standards

Executive Summary

The Americans with Disabilities Act (ADA) is a comprehensive Federal civil rights statute enacted in 1990. Comprised of five major parts, or “titles”, the ADA’s stated purpose was to provide a “clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities”. It is estimated by the U.S. Census Bureau that over 50 million U.S. residents have a disability, and over 50% of senior citizens age 65 or older have a disability. Title II requires that all public entities with 50 or more employees perform a self-evaluation, prepare a transition plan, make the transition plan available for three years, publish a notice of non-discrimination, designate an ADA Coordinator, and develop a formal complaint form and grievance procedure.

The City of Brownsville has completed this self-evaluation of all City owned facilities and Public Right-of-Ways and prepared a Transition Plan that outlines the necessary steps to be fully compliant with the requirements of Title II of the ADA. The City will strive to ensure that all residents and visitors are able to access all services, programs and activities and will promptly investigate any formal grievance filed according to the grievance procedures outlined. Additionally, the City will strive to include annual budgetary allotments to make required improvements that will eventually make the various facilities fully accessible, with emphasis given to the improvements that most impact the ability of persons with disabilities to access facilities or programs. Where access cannot be provided, alternate means to provide the same opportunities to persons with disabilities will be provided.

In performing this self-evaluation, only areas open to the public were assessed at the following City facilities:

- Brownsville City Hall
- Brownsville Police Department
- Fire Station #1, #2, and #3
- Animal Shelter
- Delta Heritage Museum
- Parks and Recreation Office
- Woodmen of the World Building
- Webb Banks Passive Park
- Elma Ross Public Library

Areas of these facilities open to the public generally included parking lots, walks, park amenities, and areas within buildings that are not restricted to employees. Some buildings or areas of certain buildings have infrequent public access and were evaluated under the same guidelines. The decision to exclude areas of City facilities, or entire facilities, restricted to employees does not eliminate the need of the City to ensure full accessibility is provided to employees with disabilities, consistent with the requirements of Title I of the ADA.

In addition to City facilities and Right-of-Way, the self-evaluation reviewed existing City policies and procedures within each department. Key items reviewed within each department included ADA-specific training of employees, past interaction and accommodation of persons with disabilities, review of publications produced by each department, and staff suggestions to help them accommodate persons with disabilities. Following this review, recommendations were made to improve accessibility of programs for each department. It is the goal of the City to make facilities for all services, programs and activities fully accessible, though this will be largely dependent on a number of economic factors and future changes to the ADA Accessibility Guidelines (ADAAG) or other unforeseen requirements that would necessitate additional improvements to City facilities.

The City has committed to provide training for staff on the requirements of the ADA and make accommodations for employees with disabilities, many of which can be done without costly architectural renovations. The Transition Plan will be reviewed and updated periodically to ensure the City is fully compliant with ADAAG standards. The results of the self-evaluation identified a number of barriers at City-owned facilities. The estimated cost to correct these deficiencies is \$5,258,525.00. The degree to which these barriers limited accessibility and their priority for corrective action was subjectively categorized as “high”, “medium”, or “low”. “High” priority included barriers that effectively prohibited access to a service or program or present a safety hazard. “Medium” priority included barriers that either partially prohibited access or made it quite difficult. “Low” priority barriers typically do not limit access but are not compliant with standards. The actual implementation schedule, budgeting, and prioritization is up to the administration and is likely to be impacted by complaints, new regulations and requirements, and availability of funding.



1 - Introduction

The Americans with Disabilities Act of 1990 (ADA), enacted on July 26, 1990, is a Federal civil rights statute, under the jurisdiction of the United States Department of Justice (DOJ), which provides civil rights protection to qualified individuals with disabilities in the areas of employment, public accommodations, state and local government services, transportation, and telecommunications. The law states its purpose is “to provide a clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities”. Similar protections are provided by Section 504 of the Rehabilitation Act of 1973. The ADA was signed into law by President George Bush on July 26, 1990, providing civil rights protections for those with physical and mental disabilities in the following areas:

Title I - Employment (all Title II employers and employers with 15 or more employees.)

Title II - Public Services (state and local government including public school districts and public transportation)

Title III - Public Accommodations and Services operated by Private Entities

Title IV - Telecommunications

Title V - Miscellaneous

The City of Brownsville is classified as a “public entity” pursuant to Title II of the ADA. The City is also required to comply with Title I, which requires state and local government to practice nondiscrimination in all parts of the employment process.

The DOJ is the lead agency that oversees the ADA.

Purpose

The Code of Federal Regulations (CFR) is the codification of the general and permanent rules published in the Federal Register by the executive departments and agencies of the Federal government. It is divided into 50 titles that represent areas subject to Federal regulation. The CFR is updated yearly.

Relative to the ADA, on July 26, 1990 the DOJ issued rules implementing Title II. Title II requires state and local governments to make programs and services accessible to those with disabilities. The requirement extends beyond physical access at government facilities and includes policy changes to ensure that all people can take part in, and benefit from the programs and services of state and local governments.

The ADA regulations require state and local governments to conduct a self-evaluation of their programs and services to identify barriers to access. One of the fundamental reasons for performing the evaluation is to identify problems before they occur. Title II of the ADA states that the City is required to perform six administrative responsibilities:

1. Publicize the name and contact information of the designated ADA Coordinator responsible to oversee compliance.
2. Administer and write self-evaluation of the programmatic barriers in services offered by the local government.
3. Publicize and inform applicants, participants, and beneficiaries of the City’s policy of nondiscrimination on the basis of disability related to City services, program, and activities.
4. Establish a complaint/grievance procedure to respond to complaints of noncompliance from the public.
5. Develop a transition plan if structural changes are necessary for achieving program accessibility.
6. Retain the self-evaluation and provide it for public inspection for three years.

The City of Brownsville is committed to complying with the regulations of Title II of the ADA of 1990, and all other Federal and State regulations to make our services accessible for all of the citizens. The ADA self-evaluation and transition plan (SETP) establishes a measurable benchmark for compliance and identifies a plan to remove barriers within the City.

Self-Evaluation and Transition Plan

Overview

The City of Brownsville was made aware of issues related to non-compliance with certain requirements of the ADA by the Tennessee Department of Transportation (TDOT). TDOT found that the City did not have a SETP in place that included an evaluation of all City facilities, programs, policies, services, and activities. The City responded by contracting A2H, Inc. to assist in preparing a SETP.

The planning team at A2H, Inc. assessed City-owned and operated facilities and accessibility of pedestrian facilities within the public right of way for compliance with ADA and to complete the ADA SETP. This work plan included:

- Facilitate designating an ADA Coordinator
- Develop grievance procedures
- Conduct Public Input meeting
- Self-evaluation of the public Right-of-Way (ROW) including sidewalks, curb ramps, site furnishings, accessible signals and on-street parking in accordance with the Proposed Accessibility Guidelines for Pedestrian Facilities within Public Right of Way (PROWAG)
- Facility audit (interior and exterior)
- Prioritize ROW and facilities improvements for accessibility
- Provide Opinions of Probable Construction Costs for identified ADA improvements
- Establish a schedule in conjunction with the City staff for implementing the identified ADA improvements
- Develop written transition plan
- Adoption of the transition plan

While the self-evaluation was on-going, the City has continued its standing policy on improving sidewalks and curb ramps within the ROW to be ADA-compliant as part of public works infrastructure improvement projects. A public input meeting was incorporated to assist in the development of this SETP. These recommendations are intended to serve as the transition plan and framework for implementation. All of the recommendations in this plan for solutions to facilitate access to all individuals

are subject to review, revision, and approval of the City Board and appropriation of funding to implement the improvements.

This transition plan is an on-going, dynamic document that will need periodic review and updating. In particular, additional evaluations will be required when updates are made to the ADA or supporting statutes or when existing accessibility guidelines change or new guidelines are established. In its efforts to maintain compliance, the City has several mechanisms in place to provide for an ongoing update of the transition plan:

- Designated ADA Coordinator is empowered with oversight responsibility for implementation of the requirements of the ADA
- Implementation activities will be part of the City's annual Capital Improvement Plan
- Training of staff

Legislative Background & Framework

For more than 40 years, the City of Brownsville has been subject to many of the nondiscrimination provisions contained in the ADA. Significant precursory legislation to the ADA includes the Architectural Barriers Act of 1968 (ABA) and Section 504 of the Rehabilitation Act of 1973 (RA).

Congress' first significant effort to address discrimination on the basis of disability was its enactment of the ABA, which provided that all buildings constructed, altered, leased, or financed by the U.S. Government shall be accessible to, and usable by, individuals with physical disabilities.

Section 504 of the Rehabilitation Act states: "No otherwise qualified individual with a disability in the United States shall, solely by reason of his disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance or under any program or activity conducted by any Executive Agency". It also requires Federal agencies to provide accessible

programs and facilities.

The ADA was modeled on Section 504. The ADA applies to state and local government entities, public accommodations, public transportation, and commercial establishments. The key points of understanding for ADA are:

- The ADA is fundamentally civil rights legislation. This legislation protects the rights of people with disabilities in employment, transportation, public accommodation, and access to services offered by the public.
- The ADA addresses facility access and access to programs and services. Buildings are required to be accessible and the activities that are offered inside and outside those buildings also must be accessible.
- The ADA also addresses standards for outdoor recreation (i.e. boating and fishing facilities, swimming pools, stadiums, etc.)

The primary focus of this report is to assess the compliance of the City-owned facilities and Rights-Of-Way related to Title II of the ADA and PROWAG. Title II of the ADA was effective on January 26, 1992.

Governmental entities must ensure effective communication, including the provision of necessary auxiliary aids and services, so that individuals with disabilities can participate in civic functions. Public entities are not required to take actions that would result in undue financial and administrative burdens. However, they are required to make reasonable modifications to policies, practices, and procedures where necessary to avoid discrimination, unless they can demonstrate that doing so would fundamentally alter the nature of the service, program, or activity being provided.

One important way to ensure that Title II's requirements are being met in cities of all sizes is through self-evaluation, which is required by the ADA regulations. Self-evaluation enables local governments to pinpoint the facilities, programs and services that must be modified or relocated to ensure that local governments

are complying with Title II requirements of the ADA. A public entity that employs 50 or more employees must retain its self-evaluation for a minimum of three (3) years.

Facility Access versus Program Access

The ADA addresses two types of accessibility:

- Facility accessibility
- Program accessibility

Facility accessibility requires that a building or structure be physically accessible. Individuals with disabilities cannot be provided access to programs, services, and activities if a building is inaccessible. Program accessibility includes facility accessibility, but also means that a person with a qualified disability receives the same benefits from a program or service and has an equal opportunity to participate as any other participant. The ADA requires all City programs, but not all City buildings, to be accessible.

There is some flexibility with regard to program accessibility. Not every building (or each part of every building) needs to be accessible. Structural modifications are required only when there is no alternative available for providing program access. The City is required to provide program access, which means that programs, services and activities when viewed in their entirety, are readily accessible to and usable by individuals with disabilities.

When choosing a method of providing program access, the City will give priority to the one that results in the most integrated setting appropriate to encourage interaction among all users, including individuals with disabilities. In accordance with Title II program accessibility requirements, the City is required to:

- Provide equal access to programs, services, and activities as provided to other members of the community.
- Provide programs, services and activities in an integrated setting, unless separate or different measures are necessary to ensure equal opportunity.

- Absorb any costs necessary to ensure nondiscriminatory treatment, such as making modifications required to provide program accessibility or providing qualified interpreters.
- Allow a person with a disability to participate in a program, service or activity regardless of disability.
- Eliminate unnecessary eligibility standards or rules that deny individuals with disabilities an equal opportunity to enjoy programs, services or activities unless necessary for the provisions of the program, service or activity.
- Modify policies, practices, or procedures that deny equal access to individuals with disabilities
- Furnish auxiliary aids and services when necessary to ensure effective communication.
- Provide appropriate signage and structural communication to inform and alert individuals with visual, mobility, and hearing disabilities.
- Eliminate physical barriers to programs, services, and activities by remodeling existing facilities, constructing new facilities, or moving programs, services or activities to an accessible location.
- Ensure that newly constructed or altered buildings and facilities are free of physical and communication barriers that restrict accessibility of people with disabilities.

Undue Burden

The City does not have to take any action that it can demonstrate would result in a fundamental alteration in the nature of a program or activity, would create a hazardous condition for other people, or would represent an undue financial and administrative burden. A fundamental alteration is a change to such a degree that the original program, service, or activity is no longer the same. The determination that an undue financial burden would result must be based on an evaluation of all resources available for use in a program. For example, if a barrier removal action is judged unduly burdensome, the city must consider other options for providing access that would ensure that individuals with disabilities receive the benefits and services of the program or activity.

Pedestrian Spaces within ROW Audit

In 2020, audits of the public ROW were performed by A2H, Inc. staff. This review identified physical barriers and provided recommendations to comply with Federal accessibility requirements.

The list of right-of-ways that received an accessibility audit included:

- Sidewalks: Approximately 18 miles
- Curb Ramps: Approximately 58 intersections yielding over 196 curb ramps (both commercial and residential)
- Accessible Pedestrian Signals where present

Photographs of all amenities were taken for the record and are located in Appendix A. The specific ROW improvements recommended to remove barriers and improve accessibility are listed in Appendix A and Chapter 7.

City-owned Buildings and Associated Public Spaces Audit

Also, in 2020, audits of the City-owned and operated facilities were performed by A2H, Inc. staff. This review identified physical barriers and provided recommendations to comply with Federal accessibility requirements.

The list of City-owned Buildings and Associated Public Spaces that received an accessibility audit included:

- Brownsville City Hall
- Brownsville Police Department
- Fire Station #1, #2, and #3
- Animal Shelter
- Delta Heritage Museum
- Parks and Recreation Office
- Woodmen of the World Building
- Webb Banks Passive Park
- Elma Ross Public Library

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Photographs of all amenities were taken for the record and are located in Appendix B. The specific City-owned Buildings and Park improvements recommended to remove barriers and improve accessibility are listed in Appendix B and Chapter 7.

Public Input Meeting

A2H, Inc. facilitated a public input meeting to educate the public on the requirements of the ADA, to introduce the project goals and objectives, and to take comments on the progress of the self-evaluation. The meeting was advertised in the local newspaper (The Brownsville Press) per the City's public notice policy. Several invitations were made to groups that may have interest in ADA accessibility. Meeting Information can be found in Appendix C. Public comments should be considered in future planning corrections for City projects related to the removal of barriers within City-owned buildings and the public ROW.

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2 - Definitions

The words, phrases and definitions summarized below are included in the ADA. Refer to the ADA 28 CFR 35.104 for full definitions. A list of common terms and definition are included below.

2010 Standards: the 2010 ADA Standards for Accessible Design (ADAAG). which consist of the 2004 ADAAG and requirements contained in 35.151.

Access Board: an independent Federal agency devoted to accessibility for people with disabilities. The Access Board developed the accessibility guidelines for the ADA and provides technical assistance and training on these guidelines.

Accessible: refers to a site, facility, work environment, service, or program that is easy to approach, enter, operate, participate in, and/ or use safely and with dignity by a person with a disability.

Affirmative Action (AA): a set of positive steps that employers use to promote equal employment opportunity and to eliminate discrimination. It includes expanded outreach, recruitment, mentoring, training, management, development, and other programs designed to help employers hire, retain and advance qualified workers from diverse backgrounds including persons with disabilities. Affirmative action means inclusion not exclusion. Affirmative action does not mean quotas and is not mandated by the ADA.

Alteration: A change to a facility in the public right-of-way that affects or could affect pedestrian access, circulation or use. Alterations include, but are not limited to, resurfacing, rehabilitation, reconstruction, historic restoration, or changes or rearrangement of structural parts or elements of a facility.

Americans with Disabilities Act (ADA): A comprehensive, Federal civil rights law that prohibits discrimination against people with disabilities in employment state and local government programs and

activities, public accommodations, transportation and telecommunications.

ADA Accessibility Guidelines (ADAAG): scoping and technical requirements to be applied during the design, construction, and alteration of buildings and facilities covered by titles II and III of the ADA to the extent required by regulation issued by Federal agencies including the DOJ and the Department of Transportation (DOT).

Complaint: a written statement, alleging violation of the ADA, which contains the complainant's name and address and describes the City's alleged discriminatory action in sufficient detail to inform them of the nature and date of the alleged violation. It shall be signed by the complainant or by someone authorized to do so on his or her behalf. Complaints filed on behalf of classes or third parties shall describe or identify (by name, if possible) the alleged victims of discrimination.

Covered Entity: under the ADA, "covered entity" is an entity that must comply with the law. Under Title II, covered entities include state and local government instrumentalities, the National Railroad Passenger Corporation, and other commuter authorities and public transportation systems.

Cross Slope: The grade that is perpendicular to the direction of pedestrian travel.

Curb Line: A line at the face of the curb that marks the transition between the curb and the gutter, street, or highway.

Curb Ramp: A ramp that cuts through or is built up to the curb. Curb ramps can be perpendicular or parallel or a combination of parallel and perpendicular ramps.

Disability: with respect to an individual, means a physical or mental impairment that substantially limits one or more of the major life activities of such individual; a record of such an impairment; or being regarded as having such an impairment.

Discrimination on the basis of disability:

means to:

- Limit, segregate, or classify a participant in a program or activity offered to the public in a way that may adversely affect opportunities or status because of the participant's disability;
- Participate in a contract that could subject a qualified citizen with a disability to discrimination;
- Use any standards, criteria, or methods of administration that have the effect of discriminating on the basis of disability;
- Deny equal benefits because of a disability;
- Fail to make reasonable accommodation to known physical or mental limitations of an otherwise qualified individual unless it can be shown that the accommodation would impose an undue burden on the City's operations;
- Use selection criteria that exclude otherwise qualified people with disabilities from participating in the programs or activities offered to the public; and,
- Fail to use tests, including eligibility tests, in a manner that ensures that the test results accurately reflect the qualified applicants skills or aptitude to participate in a program or activity.

Facility: All or any portion of building, structures, improvements, elements, and pedestrian or vehicular routes located in the public right-of-way.

Grade Break: The line where two surface planes with different grades meet.

Major Life Activity: term used in the ADA definition of disability. It refers to activities that an average person can perform with little or no difficulty, such as walking, seeing, speaking, hearing, breathing, learning, performing manual tasks, caring for oneself, and working.

Pedestrian Access Route: A continuous and unobstructed path of travel provided for pedestrians with disabilities within or coinciding with a pedestrian circulation path.

Pedestrian Circulation Path: A prepared exterior

or interior surface provided for pedestrian travel in the public right-of-way.

Physical or Mental Impairment: a physical or mental limitation that may include, but are not limited to: vision, speech, and hearing impairment; emotional disturbance and mental illness; seizure disorders; mental health problems; orthopedic and neuromotor disabilities; learning disabilities; diabetes; heart disease; nervous conditions; cancer; asthma; hepatitis B; HIV infection (HIV condition); and drug addiction if the addict has successfully completed or is participating in a rehabilitation program and no longer uses illegal drugs. The following conditions are not physical or mental impairments: transvestism, illegal drug use; homosexuality or bisexuality; compulsive gambling; kleptomania; pyromania; pedophilia; exhibitionism; voyeurism; pregnancy; height; weight; eye color; hair color; left handedness; poverty; lack of education; a prison record; and poor judgment or quick temper if not symptoms of a mental or physiological disorder.

Public Entity: entities that must comply with Title II. The term is defined as: any state or local government; any department, agency, special purpose district, or other instrumentality of a state or local government; or certain commuter authorities as well as Amtrak. It does not include the Federal government.

PROWAG: Proposed Accessibility Guidelines for Pedestrian Facilities within Public Right of Way - These proposed guidelines for sidewalks, including pedestrian access routes, street crossings, curb ramps and blended transitions, on-street parking, street furniture, and other elements. The specifications comprehensively address access that accommodates all types of disabilities, including mobility and vision impairments, while taking into account conditions and constraints that may impact compliance, such as space limitations and terrain.

Readily Achievable: easily accomplished and able to be carried out without much difficulty or expense. In determining whether an action is readily achievable, factors to be considered include cost of action, overall

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financial resources and effect on expenses, safety requirements, impact on a site, overall financial resources needed.

Running Slope: The grade that is parallel to the direction of pedestrian travel.

Title V of the Rehabilitation Act of 1973: title of the law that prohibits discrimination on the basis of a disability by the Federal government, Federal contractors, by recipients of Federal financial assistance, and in Federally conducted programs and activities.

Transition Plan: refers to a requirement that state and local governments employing 50 or more people develop plan detailing structural changes necessary to achieve facility program accessibility.

Undue Burden: means significant difficulty or expense incurred in the provision of accommodation. Undue burden includes, but is not limited to, financial difficulty. Undue burden refers to any modification that would be unduly costly, extensive, substantial, or disruptive, or that would fundamentally alter the nature of operation of the business of the City. Whether a particular accommodation will impose an undue hardship is determined on a case-by-case basis. If a particular modification is determined to cause an undue burden to the City of Brownsville, the City shall attempt to identify another modification. If cost causes the undue burden, the City must consider whether funding for the modification is available from another source. If there is no available source to pay for the modification the City must give the person with disability the opportunity to fund the modification.

Undue Hardship: with respect to the provision of an accommodation under Title I of the ADA, significant difficulty or expense incurred by a covered entity, when considered in light of certain factors. These factors include the nature and cost of the accommodation in relation to the size, resources, nature, and structure of the employer's operation. Where the facility making the accommodation is part of a larger entity, the structure and overall resources of the larger organization would

be considered as well as the financial and administrative relationship of the facility to the larger organization. Employers do not have to provide accommodations that cause an undue hardship.

U.S. Department of Justice: Federal agency that is responsible for enforcing Titles I and II of the ADA.

U.S. Department of Transportation: Federal agency that enforces nondiscrimination in public and private transportation. Nondiscrimination includes access to public bus, train and para transit, as well as privately operated bus and shuttle transportation. The ADA does not cover air transportation, which is subject to the Air Carrier Access Act.

Vertical Surface Discontinuities: Vertical differences in level between two adjacent surfaces.

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3 - Self-Evaluation and Transition Plan - Project Approach

Data Collection and Methodology

The self-evaluation of the City's Public ROW began with the identification of the City's sidewalks and intersections. The map was generated based on available information through City GIS, using Google Earth and general knowledge of the City. City Officials helped further define the scope of the project.

The pedestrian facilities were then inventoried and assessed using the Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG), dated July 26, 2011, as published by the United States Access Board. Data collection was completed using Apple iPads and iPhones utilizing software to record the location of each data collection point, the numerical data, and to relate the data to a photo of what was inventoried.

The Geojot application by GeoSpatial Experts was used for data collection of right-of-ways. The GeoJot application provided a means for the creation of ADA specific attribute lists to track inventory data.

Checklists from www.adachecklist.org were used to conduct the self-evaluation audit of the City-owned buildings and associated spaces.

Database Analysis

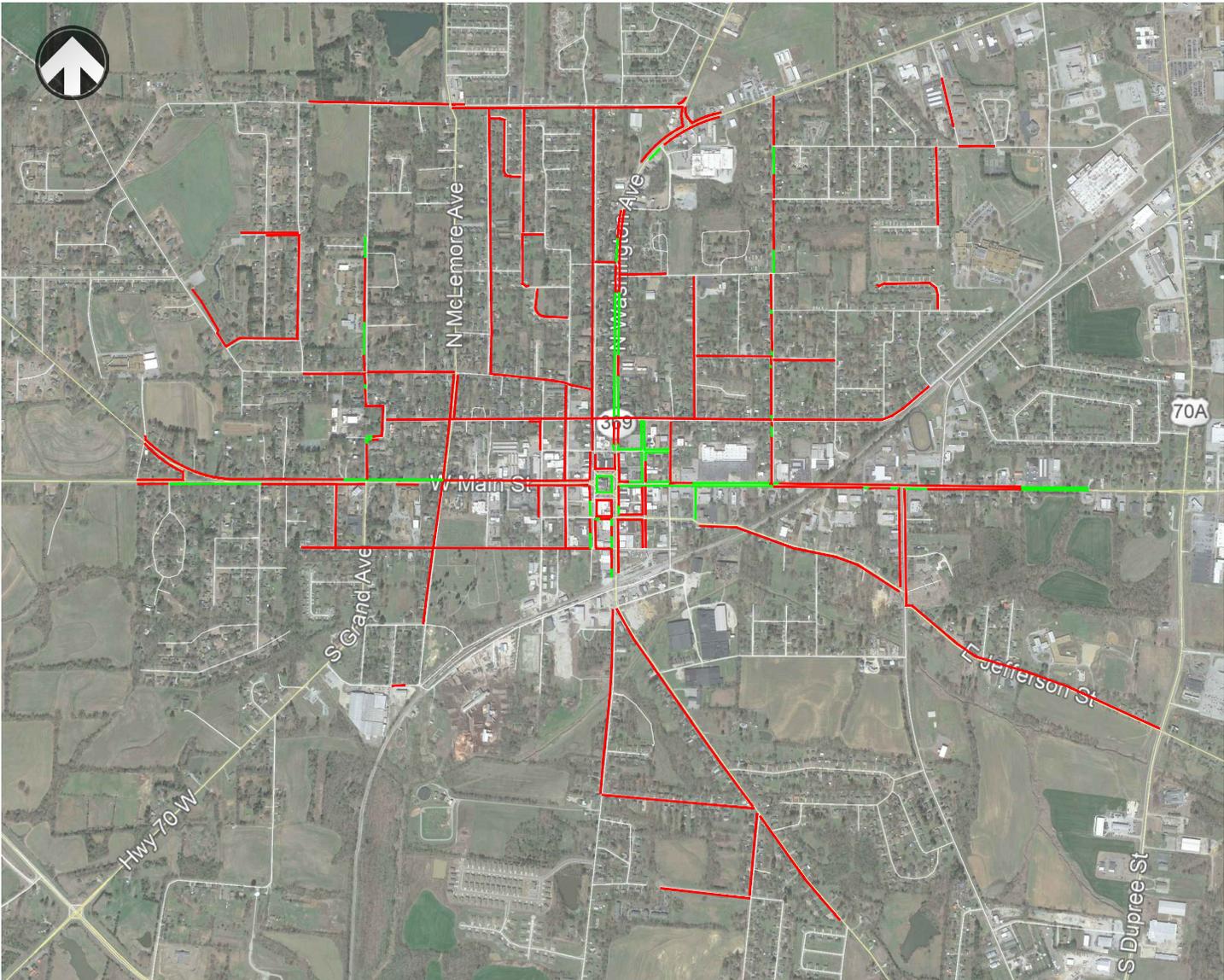
Upon completion of the self-evaluation of the public right-of-way and City-owned buildings and associated spaces, the data collected was compiled into data sheets for each data collection point or location. Each location was reviewed for compliance within the required guidelines. A priority ranking based on usage and hazard was then established as well as an estimated cost to modify or reconstruct to achieve required accessibility.



City of Brownsville - Compliant and Non-Compliant Sidewalk Inventory Map

Legend

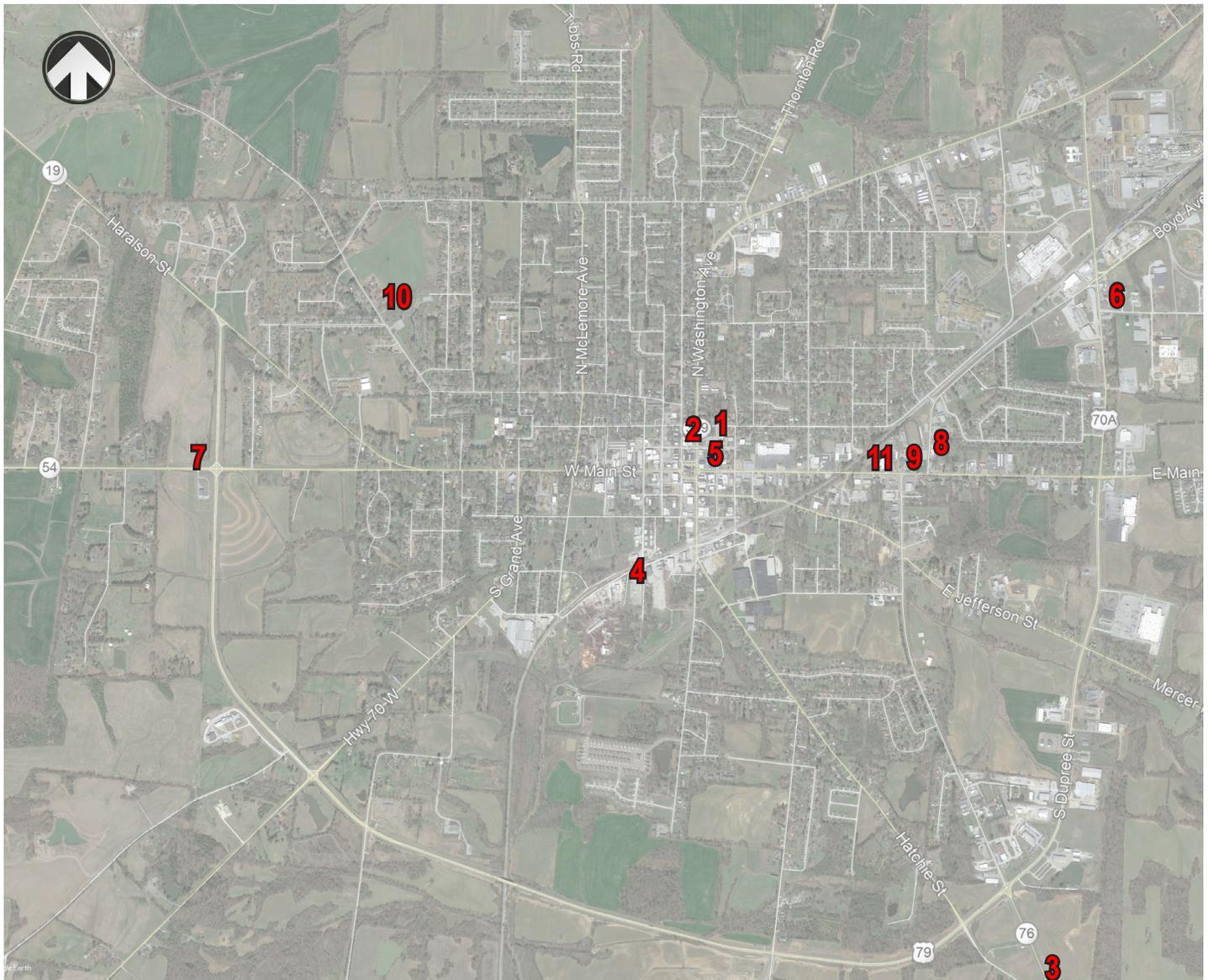
- Compliant Sidewalks
- Non-Compliant Sidewalks



City of Brownsville - Inventory Map of City-owned Buildings and Associated Spaces

Legend

- | | |
|-----------------------------------|-----------------------------------|
| 1 - Brownsville City Hall | 9 - Woodmen of the World Building |
| 2 - Brownsville Police Department | 10 - Webb Banks Passive Park |
| 3 - Delta Heritage Museum | 11 - Elma Ross Public Library |
| 4 - Animal Shelter | |
| 5 - Fire Station #1 | |
| 6 - Fire Station #2 | |
| 7 - Fire Station #3 | |
| 8 - Parks and Recreation Office | |



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4 - Self-Evaluation of City Policies, Services, Activities, and Programs

This segment of the self-evaluation plan summarizes the review of current City-wide policies, services, activities, and programs based on meetings with City staff. The findings and recommendations contained in this segment will provide the basis for the implementation of specific improvements for providing access to City programs.

Program Evaluation Interdepartmental Memo

The self-evaluation of the City's services, programs, and activities required and involved the participation of every City department. The City evaluated its policies, procedures and programs to determine current levels of service and the extent to which its policies and programs created barriers to accessibility for persons with disabilities. A2H distributed a memo to all department heads to determine the level of ADA compliance. This memo requested department staff to provide the following:

- A list of any ADA training that has been attended, performed or is planned to be done
- A list of current services/programs that the department provides to the public
- A list, including any supporting documentation of policies and practices in place for interacting/communicating with persons that have disabilities
- A contact person who can provide answers to inquiries about ADA compliance in the department
- Provide background on how that department has interacted with anyone with a disability and what actions were taken to assist meeting that person's needs
- A list of any suggestions for modifications to the department's service, policies, and procedures that may better serve persons with disabilities



Overall Findings – General Policies and Practices

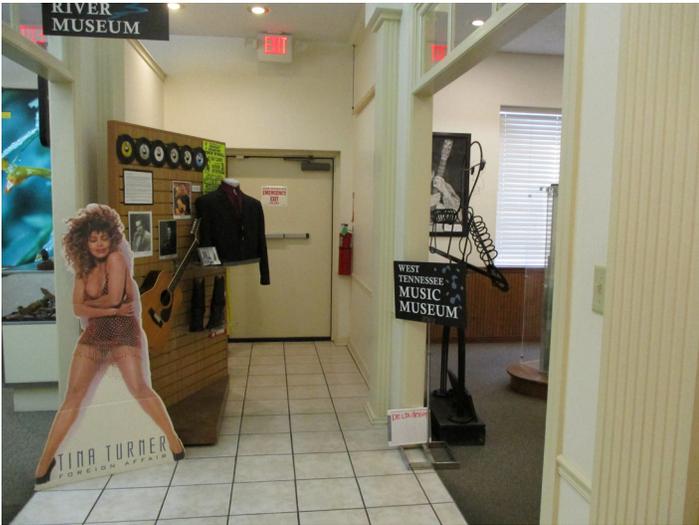
The City's self-evaluation of their Departments identified common accessibility issues between all City Departments. The findings from the City Departments can be organized into the following general categories:

- Public Information
- Designation of ADA Coordinator
- Grievance/Uniform Complaint Procedures
- Public Meetings
- Accommodations to Access Programs, Services and Activities
- Equally Effective Communication
- Alternate Communication Formats
- Information and Signage
- Staff Training

The findings and recommendations in the following subsections apply to all departments.

Public Information

The City is required to notify the public of their rights and protections under the ADA (28 CFR 35.106), which



states: “A public entity shall make available to applicants, participants, beneficiaries, and other interested persons information regarding the provisions of this part and its applicability to the services, programs, or activities of the public entity, and make such information available to them in such manner as the head of the entity finds necessary to apprise such persons of the protections against discrimination assured them by the Act and this part.” In addition, notices regarding ADA should be included in a number of other situations to inform the public of their rights and opportunities to ensure accessibility, including signage directing the public to accessible routes and entrances.

Self-Evaluation General Findings:

- Public notices, public meeting agendas, and other information published by the City do not have an ADA compliance statement included within.
- Signage directing visitors to City buildings along an accessible routes is lacking and the International Symbol of Accessibility (ISA) is not present or in clear view at all accessible entrances.

Recommended Action:

- Standard language for a Notice of Nondiscrimination needs to be used by all departments for all City

publications and printed materials. This statement should include, at a minimum, the following language: “The City of Brownsville acknowledges its responsibility to comply with the Americans with Disabilities Act of 1990. In order to assist individuals with disabilities who require special services (i.e. sign interpretative services, alternative audio/visual devices, and amanuenses) for participation in or access to City sponsored public programs, services and/or meetings, the City requests that individuals make requests for these services forty-eight (48) hours ahead of the scheduled program, service and/or meeting. To make arrangements, contact Jerry McClinton, (731)772-1212.”

- All departments need to include the above language in their meeting agendas.
- Public notification should always identify a contact person for individuals with disabilities who may request program modifications, or information on how a hearing or speech impaired person could communicate by telephone
- Increase outreach to persons with disabilities by finding additional methods and formats to provide information about meetings and other City activities. The City should endeavor to inform the public of the possible modifications required to make its services, programs, and activities accessible.
- The City Clerk’s Office should have a list of qualified individuals to contract for services to provide



information in alternate accessible formats when individuals have had a request for accommodation.

- Signage directing visitors to City buildings should be placed along the accessible routes and the International Symbol of Accessibility (ISA) should be placed in clear view at all accessible entrances.

Designation of ADA Coordinator

The ADA regulations require any public entity with fifty or more employees to designate at least one employee to coordinate ADA compliance (28 CFR 35.107 (a)). Federal regulations require public entities to make available to interested persons the name, office address and telephone number of the ADA Coordinator. The ADA Coordinator's role is to plan, coordinate, organize, facilitate, and promote compliance efforts. The Coordinator responds to requests for accommodations or barrier removal. The Coordinator also receives and investigates complaints and grievances.

Self-Evaluation Findings:

- The City has named an ADA Coordinator, Jerry McClinton, 111 N. Washington Ave., Brownsville, TN 38012, 731-772-1212, jmccclinton@brownsvilletn.gov.

Recommendations:

- Information regarding the identity of the City's ADA Coordinator should continue to be provided to staff, posted at all City locations, incorporated into employee handbooks, staff and public phone directories, placed in frequently used publications, and on the City website.
- The designated ADA Coordinator must be familiar with the requirements of ADA and get appropriate training to ensure compliance by the City.
- It is strongly suggested that each department have one individual with knowledge of ADA issues that can respond to issues that arise within their department and assist the ADA Coordinator.

Grievance/Uniform Complaint Procedures

A public entity that employs 50 or more employees must adopt and publish grievance procedures which provide for the prompt and equitable resolution of complaints alleging any action that would be prohibited by the ADA (28 CFR 35.107 (b)).

Self-Evaluation Findings:

- The City has posted their Grievance Procedure on



the City Website. Grievance Procedure Information can be found in Appendix D.

Recommendations:

- The City should formalize and publish procedures for ADA-specific complaint handling to assist with the tracking of complaint resolution. Centralized record keeping of such information will help the City to regularly update its compliance efforts, and plan for additional compliance implementation.
- Information regarding complaint procedures should be available to members of the public in addition to employees and applicants. Procedures should outline the steps needed to resolve a complaint.
- The City should review its current administrative policy and provide a form for use by members of the public who wish to file a formal complaint or grievance. The form should also note that it may be requested in an alternate accessible format, i.e. Braille, audio-tape, e-text, large print, etc.
- Administrative policies and procedures should continue to be developed, adopted, and implemented to provide consistency for filing complaints or grievances and record keeping.
- The City should make efforts to inform City staff and the general public of the name of the City's ADA Coordinator, grievance procedures, the steps for handling grievances, and the City policies for

remediation of grievances.

Public Meetings

Public meetings are routinely held by various City departments, boards, and commissions. The ADA prohibits public entities from excluding persons with disabilities from programs, services, or activities offered by a public entity. The law does allow a public entity to use both structural and nonstructural methods to achieve accessibility to programs, services, and activities (28 CFR 35.150 (a)(1); (b)(1)).

Self-Evaluation Findings:

- The City holds several meetings at various times and places that can be attended by anyone. Some of the meetings held are not in places that would be easily accessible by all.

Recommendations:

- The City should continue to schedule and hold public meetings in the most accessible locations whenever possible.
- The City should develop procedures for obtaining and providing auxiliary aids such as assistive listening systems, sign language interpreters, readers, descriptive services, and other assistive technologies.
- The City should develop means and methods to provide closed captioning (or sign language interpretation on the screen) for televised programs and for audiovisual presentations produced by the City (including videos and films) in order to ensure that persons with hearing impairments can benefit from these presentations.
- The City should make reasonable modifications to enable individuals with disabilities to attend and participate in all public meetings.
- Provide meeting agendas in alternative formats when requested.
- The City should assemble a list of readily accessible meeting spaces to facilitate the scheduling of

meetings and/or the relocation of meetings upon request.

- The City should create a simple checklist for creating accessible meetings and selection of accessible meeting spaces. This checklist should be utilized and available to all City departments for their programs and events.

Accommodations to Access Programs, Services, and Activities

The ADA prohibits public entities from excluding persons with disabilities from programs, services, or activities offered by a public entity. A public entity may not adopt policies that are discriminatory or engage in practices that are discriminatory. This prohibition applies to policies that are explicitly exclusionary and to those which appear to be neutral, but have discriminatory effect. The law does allow a public entity to use both structural and nonstructural methods to achieve accessibility to programs, services, and activities (28 CFR 35.130 (b)(3); 35.150 (a)(1); (b)(1)).

Self-Evaluation Findings:

- There is no evidence of intentional discriminatory practices, intentional exclusion of individuals with disabilities, or practices to segregate individuals with disabilities or limit access to City programs, services, or activities.
- City staff stated public meetings are generally held in locations that are thought to be accessible to persons with mobility impairments and had no recollection of any previous complaints of issues.
- Staff in most departments noted circumstances where they have improvised to achieve satisfactory solutions to remove barriers to the best of their ability.

Recommendations:

- Information directing the public how to request accommodations should appear on all public notices, announcements, and agendas. All City departments

and divisions should be provided with the City's ADA compliance statement for accommodations.

- Front line staff such as administrative assistants, receptionists, and staff that has everyday contact with the public, should receive training on interacting and accommodating individuals with disabilities.
- The City should provide additional and ongoing training for staff, including volunteers, regarding the requirements of the ADA and accommodations that provide equal access to programs, services and activities.
- The City should consider the purchase of a network PC compatible TDD/TTY system that would allow individual computers to be networked and access TDD/TTY calls, instead of purchasing separate TDD/TTY units that require a dedicated line. The advantages of a networkable system will allow the user to transfer calls, conduct conference calls, and utilize voice mail.
- All staff responsible for responding to incoming telephone calls should be trained in the protocol and use of TDD/TTY communications. Information and training should be provided on an ongoing basis.
- The City should develop procedures to ensure that TDD/TTY are maintained in a working and operable condition.
- The ADA Coordinator should continue to monitor programmatic access.

Equally Effective Communication

ADA calls for public entities to provide applicants, participants, members of the public, and companions with disabilities with communication access that is equally effective as that provided to persons without disabilities (28 CFR 35.160(a)A(d)). The regulations also require that the public entity provide the appropriate auxiliary aids and services where necessary to give people with disabilities an equal opportunity to participate in, and enjoy the benefits of a service, program, or activity of a public entity. The law stipulates that the individuals can request the auxiliary aids and services of their choice and that the City will honor the request unless a suitable

substitute exists or the request is not required under the law. In addition, the City may provide qualified interpreters via video from a remote location as long as it can meet the performance requirements of 28 CFR 35.160(d).

Auxiliary Aids and Services

Self-Evaluation Findings:

- The City has assisted customers with disabilities by modifying procedures to provide alternate means to complete transactions and offered assistance to complete City forms.

Recommendations:

- The City should provide staff training and information regarding auxiliary aids and effective communication.
- The City should confirm and update a complete list of auxiliary service providers, i.e. Braille transcription services, computer assisted transcript, dictation and transcription, assistive listening system, etc.

Interpreter Services

Self-Evaluation Findings:

- There is not a City-wide contract for qualified sign language interpreters for departments to select from.

Recommendations:

- The City should consider a City-wide contract for qualified sign interpreter services that departments could utilize as needed.
- Interpreters should be provided upon request for accommodations or in situations where an interpreter is known to be required.
- The City should explore the viability of providing qualified sign interpreters from a remote location and transmitting the disabled participant's response to the interpreter in accordance with 28 CFR 35.160(d).

Telecommunications Devices for the Deaf

Self-Evaluation Findings:

- TDD/TTY numbers are not available for any of City departments.

Recommendations:

- The City should consider the purchase of a network PC compatible TDD/TTY system that would allow individual computers to be networked and access TDD/TTY calls, instead of purchasing separate TDD/TTY units that require a dedicated line. The advantages of a networkable system will allow the user to transfer calls, conduct conference calls, and utilize voice mail.
- All staff responsible for responding to incoming telephone calls should be trained in the protocol and use of TDD/TTY communications. Information and training should be provided on an ongoing basis.
- The City should provide a centralized, direct, TDD/TTY telephone in the office of the ADA Coordinator.
- The City should develop procedures to ensure that TDD/TTY are maintained in a working and operable condition.

Website

Self-Evaluation Findings:

- The City website does have a link related to accessibility issues and provides contact information for City ADA Coordinator and grievance and complaint procedures.
- Many forms are available in Portable Document Format (PDF). Problems can be reported on the City website via e-mail.

Recommendations:

- The City's web-master developer should work to develop and refine procedures to design, maintain, update, and monitor website accessibility.

City of Brownsville, Tennessee

ADA Self-Evaluation and Transition Plan

- The City should continue to take proactive steps to ensure its web pages provide for access for the cross-section of disabilities covered under the ADA and should ensure that web pages do not exclude individuals when describing programs, services, or activities.
- The City's website should provide documents in an alternative text-based format, such as HTML (Hyper Text Markup Language) or RTF (Rich Text Format), in addition to PDF.
- The City should list the departments that offer TDD/TTY in the website phone directory (when this is implemented).
- The City should work to improve the accessibility of web pages through the use of web accessibility analysis to meet or exceed Section 508 of the Rehabilitation Act Amendments of 1998. Section 508 establishes a minimum level of accessibility for electronic information. Information on the requirements, along with suggestions for making websites accessible can be found at www.ada.gov/websites2_prnt.pdf.
- The Web Accessibility Initiative (WAI) provides guidance on making websites fully accessible (www.w3.org/WAI/).
- The International Center for Disability Resources on the Internet (ICDRI) provides information on accessibility (www.icdri.org/section508/index.htm).

Alternate Communication Formats

A public entity has a responsibility to provide information in alternative formats to comply with 28 CFR 35.160. This section of the ADA requires state and local government entities to communicate effectively with individuals who are deaf, hard-of-hearing, or have a speech, vision, or learning disability. Communication access involves providing content in methods that are understandable and usable by people with reduced or no ability to: speak, see, hear and limitations in learning and understanding. Some alternative formats can be produced in-house at minimal costs, i.e. large print, disks, and e-mail attachments. Other formats, such as Braille and audio-

formats, may need to be produced by a vendor. Alternate communication formats that are likely to be requested include, but are not limited to: audio-formats, Braille, large print, captioned films and video, electronic text/disk/CD-ROM, or sign interpreted films and video.

Self-Evaluation Findings:

- City staff indicated that they assist with filling out forms, as requested, or when alternative formats are not available.
- The majority of the departments stated they did not have a standard procedure to communicate and produce accessible alternate formats for people with disabilities.

Recommendations:

- The City should provide staff training regarding the requirements of accessible alternate formats, what accessible alternate formats are, and how to provide accessible alternate formats.
- Procedures and methods should be established for the development of accessible alternate formats to ensure that requests are handled in a uniform and consistent manner.
- The City should centralize the production of alternate formats for agendas, publications, and documents, which may result in efficiency and a cost savings.

Information and Signage

A public entity is required to ensure that individuals with disabilities are directed to an accessible entrance to a building and to the location and existence of accessible services, activities, and facilities. The ISA shall be used at each accessible entrance of a facility (28 CFR 35.163). Paragraph (b) requires the public entity to provide signage at all inaccessible entrances to each of its facilities that directs users to an accessible entrance or to a location with information about accessible facilities.

Self-Evaluation Findings:

- Most inaccessible entrances do not provide signage directing users to accessible entrances.

Recommendations:

- An accessible signing strategy for City facilities should be developed for interior and exterior directional, informational, and permanent room signs.
- Design standards for accessible signs should be created to guide the production and installation of the accessible signs.
- Signage replacement projects should include replacement or installation of accessible signs as required.

Staff and Training

On-going compliance with the ADA can only be achieved if City staff receives training and education about the rights of persons with disabilities and the obligations of public entities and its employees under Title II of the ADA. Although training is not required by the ADA, training regarding the requirements of the ADA is recommended.

Self-Evaluation Findings:

- City staff may not be knowledgeable about the different types of reasonable modifications that would make their services accessible. Some Departments have made minor adaptations to their programs regarding accessibility.

Recommendations:

- The City should provide training regarding ADA and related civil rights legislation.
- Suggested training topics include, but are not limited to:
 - Requirements of the ADA for the City of Brownsville
 - Consequences of Non-Compliance
 - Acceptable Terminology and Phrases
 - Grievance/Complaint Procedures

- Reasonable Accommodations
- Awareness and Sensitivity
- Accessible Locations for Meetings
- Consequences of Non-Compliance
- Barriers to Access – Programmatic and Physical
- Auxiliary Aids and Services
- TDD/TTY
- Building Evacuation Procedures to Assist Persons with Disabilities
- Training materials and handbooks should be prepared, if needed, in alternate formats.
- The ADA Coordinator should continue to provide or coordinate additional ADA training to all Department managers and staff who have regular contact with the public.

Department Self-Evaluation Findings and Recommendations

A2H prepared and distributed a memo to all City departments that included a request for information. This information included six specific items that the departments were requested to provide information to help A2H better understand the policies and procedures of each related to ADA understanding, training, and accommodation. The questions posed, along with the findings and comments of the self-evaluation received from each City Department are reported on the following page. Note that the responses reported are as provided by the Department to illustrate current procedures and policies. Corrections to the information provided for inaccuracies have not been made and, where appropriate, the editor of this report has added notes to clarify or supplement the responses. If a question was left blank or not addressed, it has been noted as “No Response”.

Questions

- Q1. Provide a list of any training related to the Americans with Disabilities Act that have been attended by any of them or their staff. This would include conferences, seminars, webinars, etc. Include the staff person that attended, who provided the training, date, etc.
- Q2. Provide a list of all services that each department

provides to the public

Q3. A list of any policies or documents that exist within the City and each department related to dealing with and interacting with individuals with disabilities. This would include policy manuals, memos, legal directives, statements on agendas or other written documents, etc.

Q4. Who would be the person responsible for ADA compliance in each department? Please list the name and contact information.

Q5. If your department has interacted with anyone with a disability, please provide information about the specifics of how you accommodated them to provide them with what they needed from your department.

Q6. Please list any suggestions you would have for your department to provide better service to persons with disabilities.

Mayor's Office

1. N/A
2. City Hall, Police, Fire, Central Dispatch, Animal Control, Solid Waste, Street, State Street, West TN Delta Heritage Center, Chamber of Commerce, Information Technology, Building and Codes, Storm Water, Main Street
3. N/A
4. Jerry McClinton, 731-780-0837
5. N/A
6. N/A

Analysis & Recommended Actions:

The Mayor of a City is generally considered the "go to" person for complaints and issues. As such, the staff in this office must be prepared to handle a variety of issues and individuals coming into their office unannounced. It is recommended that staff in the Mayor's Office be provided basic training in how to accommodate various persons with disabilities. A TDD/TTY should be provided in this office and staff trained in how to use the equipment.

The architectural barriers noted in Appendix B should be removed or equal accommodation provided elsewhere in City Hall.

Clerk's Office - No Response

Analysis & Recommended Actions:

It is recommended that staff in the Clerk's Office be provided basic training in how to accommodate various persons with disabilities and on the requirements for the various legal and other publications prepared by this department. The Clerk needs to designate someone within the department to be responsible for ADA compliance for daily business. Verbiage regarding accessibility should be implemented on all documentation immediately. The Clerk's Office should have and maintain a list of qualified individuals that can provide services to persons with disabilities if accommodation is requested (signers, interpreters, etc.). A TDD/TTY should be provided in this office and staff trained in how to use the equipment.

Police Department - No Response

Analysis & Recommended Actions:

The Police Department is very visible to the residents and has regular interaction. It is recommended that the Police Department receive training on ADA accessibility issues related to their activities. In particular, training on communicating with people who are deaf or hard of hearing (reference www.ada.gov/lawenfcomm.pdf) and developing a policy on the topic as well (refer to www.ada.gov/lawenfmodpolicy.pdf). The architectural barriers noted should be removed.

Library

1. I looked back from the last two years of Inservice training, etc. I attended a Guidelines for Policies and Procedures training on 7-18-2018. The spreadsheet used to store this information does not give the speaker's name. Training was held at the Hatchie River Regional Library. I have also attended a couple of different Inservice Trainings with Ruth Hemphill from the Tennessee Library for Accessible Books and Media. Also there have been Technology Roundtable trainings with our regional/state computer staff regarding computer use and Americans with Disabilities Act; however, I do not have dates/times for these.

2. The Mission of the Elma Ross Public Library is to: Inspire Reading, Advance Lifelong Learning, Connect

and Strengthen our Community. To that end, the Elma Ross Public Library offers its patrons information available through a variety of media for children, teens, and adults – ex.: books, audiobooks, e-books, periodicals, DVD, as well as from the Internet itself. We offer the patrons the use of computers with the Office Suite and Internet capabilities. We have patrons who create resumes, do job searches, complete on-line job applications, create posters and fliers, etc. We offer free Basic Skills Computer Classes monthly. We offer programming for children, teens, and adults. We offer faxing services, copying services, scanning services. Our Assistant Director is also a Notary.

3. There are currently no documents related to dealing with and interacting with individuals with disabilities. I and the entire library staff treat all persons who enter our facilities with dignity and respect. If accommodations need to be made for an individual with disabilities, then they are made for the safety and comfort of the individual.

4. The Library Director is responsible for ADA compliance. My name is Katherine Horn. Phone number is 731-772-9534. Fax number is 731-772-5416. Email is elmarosspubliclibrary@gmail.com

5. There are several persons with disabilities who utilize library services. Some use a Kindle or other e-reader to access information. There are some who use our computers. For those who are in wheelchairs, the library furniture is moved for easier access to the computer desks. There are two computer desks that can be raised for easier access as well.

6. A larger library facility where we could have more space between bookcases, tables, and easier access to the computer desks. Automatic doors at front and Meeting Room entrances. More floor space in bathrooms for maneuverability for persons in wheelchairs.

Analysis & Recommended Actions:

The library has several interactions and provides several services to the general public. An administrative policy should be adopted that outlines the modifications that the Library will provide to make sure anyone with a disability is served as required. (Large print materials, braille, audio recordings, etc.)

A TDD/TTY should be provided and staff trained in how

to use the equipment.

The architectural barriers noted should be removed or equal accommodation provided elsewhere.

City Building Inspector

1. Jerry McClinton, Certified Building Inspector. Certifications: Residential, Commercial, Building, Mechanical and Plumbing which include ADA Compliance

2. The mission of the building and code enforcement department is to ensure that any building done in the city limits is up to current local, state and federal zoning and building codes. We also strive to ensure that property in our city is maintained by enforcing our care of premises codes. This includes enforcing the city's ordinances regarding grass, junk vehicles, abandoned houses, signage, and unsightly property. This is to protect the public welfare, health and safety of our citizens.

3. Current Adopted Codes

2012 International Residential Code

2012 International Building Code

2012 International Plumbing Code

2012 International Fuel Gas Code

2012 International Fire Code

2012 International Mechanical Code

4. Jerry McClinton, 731-780-0837

5. N/A

6. N/A

Analysis & Recommended Actions:

The City Building Inspector will typically interact with general public outside of their office location. The department can perform many of their functions and interactions with the public via telephone, however there is no TDD/TTY available. Train and provide a TTY phone for staff.

5 - Self-Evaluation of Pedestrian Spaces Within the Right-Of-Way

This portion of the self-evaluation summarizes the review of sidewalks within the right-of-way. The findings and recommendations will provide the basis for the implementation of specific improvements for the accessibility of City sidewalks. Refer to Appendix A for self-evaluation data and findings.

Per R204 of the PROWAG, a pedestrian access route is a continuous and unobstructed path of travel provided for pedestrians with disabilities within or coinciding with a pedestrian circulation path in the public Right-of-Way. Pedestrian Access Routes in the public Right-of-Way ensure that the transportation network used by pedestrians with disabilities. Pedestrian access routes must be provided within sidewalks, and other pedestrian circulation paths located in the public right-of-way; pedestrian street crossings, and at grade rail crossings, including median and refuge islands and overpasses, underpasses, bridges and similar structures that contain pedestrian circulation paths. In addition to defining the Pedestrian Access Route (PAR), the definition also provides guidance on determining the scope of areas to be evaluated for compliance.

Per the Technical provisions of the PROWAG, the sidewalk Pedestrian Access Route must meet the following general criteria:

- R302.3 Continuous Width
- R302.5 Grade (Running Slope)
- R302.6 Cross Slope
- R302.7 Surfaces

Sidewalk Width

Requirements:

Per 302.3 of the PROWAG, the continuous clear width shall be 4' minimum exclusive of the width of curb. Five feet of width is preferred and required by TDOT. When



Photo: Typical 5' sidewalk width

the clear width is less than 5', passing spaces must be provided every 200' minimum. This provides a place for the pedestrian to change directions and accommodates passing movements and turning spaces.

Self-Evaluation Findings:

Most sidewalks within the City of Brownsville have compliant sidewalk widths of 5' per TDOT standards.

Addressing the Issue:

Where ROW is available, the width can be corrected by widening the sidewalk.

To address future construction, The City of Brownsville should ensure City ordinances and codes comply with both state and federal regulations.

Sidewalk Running Slope

Requirements:

Per R302.5 of the PROWAG, the grade (running slope) of the sidewalk shall not exceed the grade of the adjacent street. Otherwise, a 5% maximum must be maintained.

Self-Evaluation Findings:

Most sidewalks (Approximately 85%) within the City of Brownsville had compliant running slopes.

Addressing the Issue:



Photo: Non-compliant cross slope

For running slopes of over 5% (when not adjacent to roadways that exceed 5%), solutions may include:

- Lowering the grade
- Removing and regrading adjacent sidewalk panel to redistribute the slope.
- Installation of a ramp that would include handrails and landings in compliance with PROWAG ramp requirements.

Sidewalk Cross Slope

Requirements:

Per R302.6 of the PROWAG, the cross slope of the sidewalk shall be less than 2%. An exception is at pedestrian street crossings without yield or stop control or mid-block crossings.

Self-Evaluation Findings:

Approximately 95% of the non-compliant sidewalks within the City of Brownsville have cross slopes in excess of 2%.

Addressing the Issue:

For cross slopes of over 2% potential solutions may include:

- Lowering grade.
- Removing and regrading adjacent tree/lawn area to achieve a compliant slope.



Photo: Changes in level due to surface conditions

- Install a curb or retaining wall in areas where grading cannot be achieved due to right-of-way or building frontage.

Changes in Level / Surface Condition

Requirements:

Per 302.7 of the PROWAG, the surface of the pedestrian access route shall be firm, stable and slip resistant. Grade breaks shall be flush. Vertical surface discontinuities or changes in level shall be 1/2" maximum with those between 1/4" and 1/2" being beveled at a slope not steeper than 50% across the entire discontinuity. Horizontal openings such as grates and joints may not exceed 1/2". Elongated openings should be placed perpendicular to the dominant direction of travel.

Self-Evaluation Findings:

Within the City, cracking, spalling and level changes of 1/4" or more were observed at several locations. The most severe incidences of level changes, spalling and cracking were found in the residential quadrants where older sidewalks were deteriorating.

Addressing the issue:

Changes in level and surface condition are seen as infrastructure ages. In high traffic areas temporary fixes may be implemented to promote safety while long term



Photo: Cracking and overgrown conditions

solutions are planned. The following may help address changes in level and surface conditions.

Level Changes

- Temporary placement of adjacent ramp
- Grinding the edge at surface of changes of level up to 1/2" to achieve allowable beveled edge.
- Replacement of a concrete panel
- Reroute sidewalk around large tree roots where roots have caused damage to sidewalks.

Surface Condition

- Replacement of damaged sidewalk panel.
- If asphalt, mill and overlay with new asphalt.
- Keep free of vegetation and debris.

Obstructions, Protrusions and Utility Considerations

Requirements:

Per R402.2 of the PROWAG, protruding objects are those objects with leading edges more than 27" and not more than 80" above the finish surface which protrude more than 4" horizontally into pedestrian circulation paths.

Per R210, site furnishings and other objects may not reduce the minimum clear width of the pedestrian access route. These items would be considered an obstruction



Photo: Lack of maintenance leads to overgrown conditions

of the continuous clear width provided.

Self-Evaluation Findings:

Majority of the obstructions observed within the City of Brownsville were utility equipment related; other obstructions observed were:

- Vegetation
- At grade conflicts including manholes, access boxes, and grates that create changes in level and vertical discontinuities.
- Vertical obstructions include signage, light poles, hydrants, mail boxes, and various utilities.

Addressing the Issue:

Moveable obstructions can be addressed by the enforcement of ordinances. Implementation of ordinances restricting parking and placement of obstruction on public sidewalks may help in residential areas. Similar restrictions should discourage trash bins from being placed on sidewalks.

Vegetative obstructions should be managed with routine maintenance and by encouraging home owner participation to maintain a clear right-of-way.

A fixed obstruction or utility obstruction may be difficult or costly to address. Utilities may need to be relocated which may require purchasing additional right-of-way



Photo: Utility pole obstructs sidewalk

from adjacent property owners. It may be more feasible to provide an alternate route.

Curb Ramp Types

Curb ramp types are classified based on the orientation of the ramp to the adjacent curb. As stated in Advisory R304.1 of the PROWAG, the following types of curb ramps exist:

Perpendicular Curb Ramp

Perpendicular curb ramps have a running slope that cuts through or is built up to the curb at right angles or meets the gutter break at right angles where the curb is curved.



Photo: Non-conforming curb ramp

Parallel Curb Ramp

Parallel curb ramps have a running slope that is in-line with the direction of sidewalk travel (Parallel to the curb) and lower the sidewalk to a level turning space where a turn is made to enter the pedestrian street crossing. Parallel ramps can be useful where ROW is limited to get a pedestrian from street level to the sidewalk in a shorter depth space.

Combination Curb Ramp

Parallel and perpendicular curb ramps can be combined. A parallel curb ramp is used to lower the sidewalk to a mid-landing and a short perpendicular curb ramp connects the landing to the street. Combination curb ramps can be provided where the sidewalk is at least 6' wide and can provide access in situations where the sidewalk is much higher than 6" above the street elevation.

Blended Transition

Blended transitions are raised pedestrian street crossings, depressed corners, or similar connections between pedestrian access routes at the level of the sidewalk and the level of the pedestrian street crossing that have a grade of 5 percent or less. Blended transitions are suitable for a range of sidewalk conditions.

Diagonal Curb Ramp

Per R207.2 of the PROWAG, where existing physical constraints prevent compliance with R207.1, a single diagonal curb ramp shall be permitted to serve both pedestrian street crossings.

Diagonal curb ramps are not the preferred method of construction due to lack of directional cues for pedestrians using the crossing and safety concerns created by vehicles misconstruing pedestrian intentions.

Curb Ramp Width

Requirements:

Per R304.5.1 of the PROWAG, the clear width of curb ramp runs (excluding any flared sides), blended transitions, and turning spaces shall be 4' minimum.

Self-Evaluation Findings:

Within the City of Brownsville, approximately 90% of the locations provided adequate clear width for the curb ramp run.

Addressing the Issue:

Ramp width could be limited by adjacent ROW availability, obstructions, or simply that have been constructed too narrow to meet current requirements. If more ROW area is available the ramp can be widened by replacement or addition of pavement. If it cannot be widened due to obstructions or ROW limitations a different ramp configuration may offer a solution. If there is an obstruction, relocation of the obstruction may be a solution. Acquiring additional ROW may also be an option.

Curb Ramp Slopes

Requirements:

Per 304.2.2 of the PROWAG, the running slope of the curb ramp shall cut through or shall be built up to the curb at right angles or shall meet the gutter grade break at right angles where the curb is curved. The running slope of the curb ramp shall be 5% minimum and 8.3% maximum but shall not require the ramp length to exceed 15'. Additionally, the counter slope of the gutter or street at the foot of curb ramp runs, blended transitions, and turning spaces shall be 5% maximum.

Per R304.5.3, the cross slope of curb ramps, blended transitions, and turning spaces shall be 2% maximum. At pedestrian street crossings without yield or stop control and at mid-block pedestrian street crossings, the cross slope shall be permitted to equal the street or highway grade.

Per 304.5.2, grade breaks at the top and bottom of curb ramp runs shall be perpendicular to the direction of the ramp run. Grade breaks shall not be permitted on the surface of ramp runs and turning spaces. Surface slopes that meet at grade breaks shall be flush.

Self-Evaluation Findings:

Within the City, the following slope data was collected:

- Less than 10% of non-compliant locations have ramp running slopes greater than the acceptable maximum of 8.3%
- Almost 90% of non-compliant locations have cross slopes over the acceptable maximum of 2%

Addressing the Issue:

Non-compliant ramp slopes can occur due to a number of factors including construction tolerances, design inconsistencies, construction to old standards, steep roadway grades, adjacent building challenges, obstructions and limited ROW.

Possible solutions include:

- Extending the rise of the ramp over a longer run
- Creating a combination ramp.
- Maxing out the allowable slope of adjacent sidewalk panels.
- Incorporating return curbs or retaining walls to avoid obstructions.

Curb Ramp Flares

Requirements:

Per R304.2.3 of the PROWAG, where a pedestrian circulation path crosses the curb ramp, flared sides shall be sloped 10% maximum, measured parallel to the curb line.

Self-Evaluation Findings:

Only a few Curb ramp flares were observed along Brownsville's sidewalks and most were compliant.

Addressing the Issue:

Non-compliant flare slopes or configurations can be caused by several issues including construction tolerances, design inconsistencies, construction to old standards, adjacent buildings, obstructions, or limited ROW.

Possible solutions include:

- Extending the rise of the flare over an appropriate run.
- Using a returned curb instead of a flare.
- Replacing flare and removing curb as necessary to accommodate corrected flare.

Curb Ramp Landings & Turning Spaces

Requirements:

Per 304.2 and 304.3 of the PROWAG, a turning space of 4' minimum by 4' minimum shall be provided at the top of the curb ramp and shall be permitted to overlap other turning spaces and clear spaces. Where the turning space is constrained at the back of sidewalk, the turning space shall be 4' minimum by 5' feet minimum. The 5' dimension shall be provided in the direction of the ramp run.

Additionally, per R304.5.5, beyond the bottom grade break, a clear space 4' minimum by 4' minimum shall be provided within the width of the pedestrian street crossing and wholly outside the parallel vehicle travel lane. For parallel ramps (R304.3), this means at the bottom of the ramp behind the curb line. Diagonal ramps must also accommodate this turning space within the crosswalk and wholly outside the vehicle travel lanes.

Per R304.5.3 the cross slope of curb ramps, blended transitions, and turning spaces shall be two percent maximum.

Self-Evaluation Findings:

- Most locations did not meet landing slope and size requirements.
- Some locations met landing size locations, but lacked the appropriate landing slopes.

Addressing the Issue:

Non-compliant landings can be caused by a number of factors including construction tolerances, design inconsistencies, construction to old standards, adjacent

buildings, obstructions and limited ROW.

Possible solutions may include:

- Constructing new landings and turning spaces adjacent to the tops of ramp.
- Creating a combination ramp to accommodate misaligned landing.
- Increasing slope of adjacent sidewalks.
- Replacing blended transition with curb ramp to increase available space for landings.
- Incorporate returned curb to avoid obstructions.

Curb Ramp Detectable Warnings

Requirements:

Per R208 of the PROWAG, detectable warning surfaces indicate the boundary between pedestrian and vehicular routes where there is a flush connection.

Detectable warning surfaces shall be provided at the following locations:

- Curb ramps and blended transitions at pedestrian street crossings
- Pedestrian Refuge Islands (unless at street and unless less than 6' in length)
- Pedestrian at grade rail crossings not located within a street or highway

Detectable warnings should not be provided at crossings of residential driveways as the pedestrian ROW continues across residential driveway aprons. They should be provided at high traffic commercial driveways provided with yield or stop control since these function similarly to roadways, such as those found at large commercial centers.

Per 305.1, Detectable warning surfaces shall extend 2' into the direction of travel. At curb ramps and blended transitions, detectable warning surfaces shall extend the full width of the ramp run.

Self-Evaluation Findings:

- Most curb ramps observed within Brownsville did have detectable warnings with the exception of

residential neighborhoods.

Addressing the Issue:

- If all other ramp criteria are within compliance detectable warning kits can be purchased and installed.
- If detectable warning plate does not extend full width or depth, they can be removed and replaced along with any concrete damaged by the operation.

Signalized Intersections

Requirements:

According to the Public Rights-of-Way Accessibility Guidelines:

‘An accessible pedestrian signal and pedestrian push button is an integrated device that communicates information about the WALK and DON’T WALK intervals at signalized intersections in non-visual formats to pedestrians who are blind and have low vision.’

Per R209, ‘where pedestrian signals are provided at pedestrian street crossings, they shall include accessible pedestrian signals (APS) and pedestrian push buttons complying with sections 4E.08 through 4E.13 of the 2009 Manual on Uniform Traffic Control Devices (MUTCD)’.

General Accessible Pedestrian Signal Requirements (Additional requirements not listed here may be provided in the MUTCD for specific locations and crossing time parameters):

- Accessible pedestrian signals shall be used in combination with pedestrian signal timing.
- Signs shall be mounted adjacent to or integral with pedestrian pushbuttons explaining their purpose or use.
- Positioning of pedestrian pushbuttons and the legends on the pedestrian pushbutton signs shall clearly indicate which crosswalk signal is actuated by each pedestrian pushbutton.
- Pushbutton shall activate both the walk interval and the accessible pedestrian signals.
- Vibrotactile walk indicators shall be provided by a

tactile arrow on the pushbutton that vibrates during the walk interval.

- Have an audible walk indication during the walk interval only. The audible walk indication shall be audible from the beginning of the associated crosswalk.
- The accessible walk indication shall have the same duration as the pedestrian walk signal.
- Audible tone walk indications shall repeat at eight to ten ticks per second. Audible tones used as walk indications shall consist of multiple frequencies with a dominant component at 880 Hz.
- Automatic volume adjustment in response to ambient traffic sound level shall be provided up to a maximum volume of 100 dBA.
- To enable pedestrians who have visual disabilities to distinguish and locate the appropriate pushbutton at an accessible pedestrian signal location, pushbuttons shall clearly indicate by means of tactile arrows which crosswalk signal is actuated by each pushbutton. Tactile arrows shall be located on the pushbutton, have high visual contrast, and shall be aligned parallel to the direction of travel on the associated crosswalk.
- An accessible pedestrian pushbutton shall incorporate a locator tone.

In addition, pedestrian pushbuttons should be located to meet the following:

- On an accessible route within 1.5’ to 6’ from the edge of curb, shoulder or pavement.
- Between the edge of the crosswalk, but no greater than 5’ from the cross walk.
- Parallel to crosswalk intended for.
- Unobstructed and within reach between 15” and 48” above finished grade.

Self-Evaluation Findings:

There were 6 existing signalized intersections inventoried within the City of Brownsville that have pedestrian connections.

Addressing the Issue:

The City should plan on installing compliant pedestrian signals in future improvement projects.



6 - Self-Evaluation of City-owned Buildings and Public Spaces

In 2020, interior and exterior audits of buildings, facilities, and parks were performed only in those areas open to the public. This review identified physical and architectural barriers and provided recommendations to comply with Federal accessibility requirements. The list of facilities that received an accessibility audit included:

- City-owned buildings, i.e. City Hall, police station, library, etc.
- City-owned parks, including public restrooms

Areas of these facilities open to the public generally included parking lots, walks, park amenities, and areas within buildings that are not restricted to employees. Some buildings or areas of certain buildings have infrequent public access and were evaluated under the same guidelines. The decision to exclude areas of City facilities, or entire facilities, restricted to employees does not obviate the need of the City to ensure full accessibility is provided to employees with disabilities, consistent with the requirements of Title I of the ADA.

The results of the self-evaluation identified a number of barriers at City facilities. The degree to which these barriers limited accessibility and their priority for corrective action was subjectively categorized as “high”, “medium”, or “low”. “High” priority included barriers that effectively prohibited access to a service or program or present a safety hazard. “Medium” priority included barriers that either partially prohibited access or made it quite difficult. “Low” priority barriers typically do not limit access but are not compliant with standards. The actual implementation schedule, budgeting, and prioritization is up to the administration and is likely to be impacted by complaints, new regulations and requirements, and availability of funding.

The specific site and architectural improvements recommended to remove barriers and improve accessibility are listed in Appendix B - City of Brownsville, Facility Reports.



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7 - Transition Plan

The Transition Plan describes how the City will be transitioning to compliance with the ADA requirements. The City must provide access for individuals with disabilities and document areas of noncompliance.

At a minimum, the elements of the Transition Plan are:

1. A list of the physical barriers in the City's facilities that limit the accessibility of its programs, activities, or services to individuals with disabilities [28 CFR 35.150 (d)(3)(i)]
2. A detailed outline of the methods to be utilized to remove these barriers and make the facilities accessible [28 CFR 35.150 (d)(3)(ii)]
3. The schedule for taking the necessary steps to achieve compliance with Title II of the ADA. If the time period for achieving compliance is longer than one year, the plan should identify the interim steps that will be taken during each year of the transition period [28 CFR 35.150 (d)(3)(iii)]
4. The name of the official responsible for the plan's implementation. [28 CFR 35.150 (d)(3)(iv)]

The transition plan reports the findings of the ROW and City-owned building audits. The specific improvements required to make the City right-of-way accessible are listed in Appendix A. The specific improvements required to make the City-owned buildings accessible are listed in Appendix B. Removing barriers limiting access to high priority areas such as publicly accessible City owned offices or those which present a safety hazard should be the City's first priority.

Priorities

ADA upgrades and/or additions and other features will be installed or reinstalled in the locations identified in the Self-Evaluation according to the following priorities:

Priority 1 - Compliance of all City-owned Facilities (Interior and Exterior)

Priority 2 - Compliance of all Curb Ramps with Pedestrian Access Routes (Replace commercial Curb Ramps first then residential Curb Ramps)

Priority 3 - Compliance of Signalized Intersections

Priority 4 - Compliance within public ROW (Sidewalks, Aprons & Signalized Intersections along commercial streets followed by residential streets)

Financial Considerations for Barrier Removal

Within a typical municipality budget, the cost of making these improvements within a specified time frame and with the current economy can be overwhelming. Due to the magnitude of estimated construction costs to modify these existing pedestrian facilities, it will be necessary for the City to make accessibility improvements on a yearly basis. As the City grows more funding should be dedicated to the improvements of the public right-of-ways and City-owned buildings. The City will strive to include an amount ranging from \$15,000 - \$20,000 during the annual budget process. These funds will be dedicated to making improvements to pedestrian accessibility in high priority areas providing the greatest access benefit to buildings and public right-of-way.

The number and size of these projects will largely be dependent on a number of economic factors and future changes to the ADA Accessibility Guidelines (ADAAG), the Public Right of Way Accessibility Guidelines (PROWAG), or other unforeseen requirements that may

necessitate additional improvements to City facilities. Determination of yearly scope of improvements should include the physical barrier prioritization, consideration of contributing contextual factors and high traffic areas, as well as planned infrastructure improvements. It is recommended that all safety hazards be addressed individually where needed for the safety of all citizens. Complaints received may also help determine the priorities of the improvements. If the City receives complaints about access at a particular location that is not slated for upgrades for several years, they should adjust the Transition Plan to accommodate the implementation of improvements as necessary.

The City of Brownsville may choose to modify the priorities based on funding levels and changes in City programs activities and services, to have flexibility in accommodating community requests and complaints. All costs noted are 2020 estimates and subject to change based on market conditions, economic conditions, inflation, material selection, etc.

Based on the self-evaluation, a total of approximately \$5,258,525 in improvements would be required (2020 costs) to achieve accessibility at all City-owned facilities and pedestrian walkways within the ROW. Note that the cost of some improvements is not comprehensive due to lack of information (survey), utility relocation or potential land acquisition, etc. These costs do not include any costs associated with training of staff, staff time related to training or overseeing implementation, fees, etc. Note that actual phasing, transitioning of improvements, etc. can be impacted by a number of factors that may be unknown currently, as well as economic conditions, grant opportunities, etc.

Any changes to the ADA guidelines or to the right-of-way itself after the evaluations were completed are not reflected in these basic cost opinions. Additionally, it is the City's responsibility, as required by the ADA mandate, to regularly update the Transition Plan based on the latest requirements of the ADA laws and to document constructed infrastructure that is brought up to current ADA standards. At this time, costs are estimated but

precise costs cannot be determined and the Transition Plan should be adjusted to reflect this knowledge.

City of Brownsville, Tennessee
 ADA Self-Evaluation and Transition Plan

Opinion of Probable Cost -ROW Summary

Commercial Intersections:	
Grand Avenue / W. Main St.	\$32,000.00
N. Park Avenue / E. Main St.	\$26,000.00
Anderson Avenue / E. Main St.	\$48,000.00
N. Washington Avenue / Thornton Rd.	\$26,000.00
E. Jefferson St. / S. Dupree St.	\$14,000.00
Wal Mart North Access Dr. / S. Dupree St.	\$26,000.00
	\$172,000.00
ROW:	
North of Main Street	\$2,589,600.00
South of Main Street	\$2,170,960.00
	\$4,760,560.00
Total Cost of All ROW Repairs:	\$4,932,560.00

Opinion of Probable Cost -City-Owned Facilities Summary

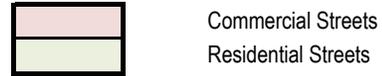
Brownsville City Hall:	
Interior Repairs	\$23,525.00
Exterior Site Repairs	\$10,000.00
	\$33,525.00
Brownsville Police Department:	
Interior Repairs	\$2,575.00
Exterior Site Repairs	\$8,500.00
	\$11,075.00
Elma Ross Public Library:	
Interior Repairs	\$34,640.00
Exterior Site Repairs	\$10,000.00
	\$44,640.00
Delta Heritage Museum:	
Interior Repairs	\$36,875.00
Exterior Site Repairs	\$16,500.00
	\$53,375.00
Fire Station #1:	
Interior Repairs	\$28,375.00
Exterior Site Repairs	\$3,500.00
	\$31,875.00
Fire Station #2:	
Interior Repairs	\$11,025.00
Exterior Site Repairs	\$3,500.00
	\$14,525.00
Fire Station #3:	
Interior Repairs	\$20,300.00
Exterior Site Repairs	\$2,500.00
	\$22,800.00
Parks and Recreation Offices:	
Interior Repairs	\$32,300.00
Exterior Site Repairs	\$3,500.00
	\$35,800.00
Woodmen of the World Building:	
Interior Repairs	\$39,800.00
Exterior Site Repairs	\$18,200.00
	\$58,000.00
Animal Shelter:	
Interior Repairs	\$7,350.00
Exterior Site Repairs	\$6,500.00
	\$13,850.00
Webb Banks Passive Park:	
Interior Repairs	\$0.00
Exterior Site Repairs	\$6,500.00
	\$6,500.00
Total Cost of all Building Repairs:	\$325,965.00

Facilities Priority List

The Facilities Priority List is based on the public use of each facility. Buildings that provide access to the public most often should be top priority. This list is subject to change per the City's recommendations and financial obligations.

- 1 - Brownsville City Hall
- 2 - Woodmen of the World Building
- 3 - Brownsville Police Department
- 4 - Elma Ross Public Library
- 5 - Delta Heritage Museum
- 6 - Fire Station #1
- 7 - Fire Station #2
- 8 - Fire Station #3
- 9 - Parks and Recreation Offices
- 10 - Animal Shelter
- 11 - Webb Banks Passive Park

**Public ROW Locations to Replace
(Sidewalks, Aprons, & Curb
Ramps)**



Public ROW Locations to Replace/Repair
East Main Street
West Main Street
Washington Avenue
Court Square (North and South)
Wilson Avenue
Lafayette Avenue
Jackson Avenue
Anderson Avenue
North Church Avenue
Franklin Street
Russell Avenue
Wilson Avenue
Jefferson Street
Margin Street
South Washington Avenue
Thomas Road
North Grand Avenue
McLeMore Avenue
Monroe Avenue
North Park Avenue
Key Corner Street
West Cherry Street
East College Street
Hatchie Avenue
East Cherry Street
Tyus Street
Tamm Street
Thornton Road
Morning Drive
Cooper Street
Wyatt Street
Scott Street
Owen Avenue
West College Street
Stehlin Street
Cummings Avenue
Penny Lane
Tambell Street
Hill Avenue

Phasing of Corrections

A phased implementation plan of the required corrections to remove physical barriers is required. The City has limited funds and cannot immediately make all facilities fully accessible. If the City's funding allows it is recommended that priorities coincide with each other. Priority phasing was developed with 2020 being the first year of construction.

Priority 1 - Compliance of all City-owned Facilities (Interior and Exterior)

Locations: 11 (See Facilities Priority list on previous page)

Estimated Cost: \$325,965

Estimated Completed Locations per Year: 1
(Approximately \$10,000 per year but costs will vary)

Target Completion Date: 2053

Priority 2 - Compliance of all Curb Ramps with Pedestrian Access Routes

Locations: 196 (Locations can be found on Pages 47-48)

Estimated Cost: \$588,000

Estimated Completed Locations per Year: 1 (\$3,000 per year)

Priority 3 - Compliance of Signalized Intersections

Locations: 6 (Locations can be found on Page 49)

Estimated Cost: \$172,000

Estimated Completed Locations per Year: .5 (\$3,500 per year)

Priority 4 - Compliance within public ROW (Sidewalks, Aprons, & all other Site Amenities)

Locations: 18 Miles (See ROW location list at Left)

Estimated Cost: \$4,172,560

Estimated Completed Locations per Year: 1 (\$3,500 per year)

Opinion of Probable Cost - Public ROW North of Main Street

ROW to be Replaced								
North of Main Street	Street Name	Description	Field Measure	Quantity	Unit	Unit Price	Amount	
North/South Streets	North Grand Avenue	Drive Apron (10' W)	340 LF	3,400	SF	\$12	\$40,800.00	
		Curb Ramp	5	5	EACH	\$3,000	\$15,000.00	
		Sidewalk (5' W)	2460 LF	12,300	SF	\$8	\$98,400.00	
	North McLemore Avenue	Drive Apron (10' W)	200 LF	2,000	SF	\$12	\$24,000.00	
		Curb Ramp	7	7	EACH	\$3,000	\$21,000.00	
		Sidewalk (5' W)	1650 LF	8,250	SF	\$8	\$66,000.00	
	North Monroe Avenue	Drive Apron (10' W)	420 LF	4,200	SF	\$12	\$50,400.00	
		Curb Ramp	5	5	EACH	\$3,000	\$15,000.00	
		Sidewalk (5' W)	2630 LF	13,150	SF	\$8	\$105,200.00	
	Cummings Avenue	Drive Apron (10' W)	180 LF	1,800	SF	\$12	\$21,600.00	
		Curb Ramp	0	-	EACH	\$3,000	\$0.00	
		Sidewalk (5' W)	920 LF	4,600	SF	\$8	\$36,800.00	
	Scott Avenue	Drive Apron (10' W)	260 LF	2,600	SF	\$12	\$31,200.00	
		Curb Ramp	4	4	EACH	\$3,000	\$12,000.00	
		Sidewalk (5' W)	1790 LF	8,950	SF	\$8	\$71,600.00	
	Stehin Avenue	Drive Apron (10' W)	100 LF	1,000	SF	\$12	\$12,000.00	
		Curb Ramp	0	-	EACH	\$3,000	\$0.00	
		Sidewalk (5' W)	460 LF	2,300	SF	\$8	\$18,400.00	
	North Wilson Avenue	Drive Apron (10' W)	120 LF	1,200	SF	\$12	\$14,400.00	
		Curb Ramp	5	5	EACH	\$3,000	\$15,000.00	
		Sidewalk (5' W)	830 LF	4,150	SF	\$8	\$33,200.00	
	Lafayette Avenue	Drive Apron (10' W)	440 LF	4,400	SF	\$12	\$52,800.00	
		Curb Ramp	8	8	EACH	\$3,000	\$24,000.00	
		Sidewalk (5' W)	3460 LF	17,300	SF	\$8	\$138,400.00	
	Washington Avenue	Drive Apron (10' W)	140 LF	1,400	SF	\$12	\$16,800.00	
		Curb Ramp	6	6	EACH	\$3,000	\$18,000.00	
		Sidewalk (5' W)	2600 LF	13,000	SF	\$8	\$104,000.00	
	North Bradford Avenue	Drive Apron (10' W)	300 LF	3,000	SF	\$12	\$36,000.00	
		Curb Ramp	0	-	EACH	\$3,000	\$0.00	
		Sidewalk (5' W)	1500 LF	7,500	SF	\$8	\$60,000.00	
	North Park Avenue	Drive Apron (10' W)	640 LF	6,400	SF	\$12	\$76,800.00	
		Curb Ramp	10	10	EACH	\$3,000	\$30,000.00	
		Sidewalk (5' W)	2860 LF	14,300	SF	\$8	\$114,400.00	
	Jackson Avenue	Drive Apron (10' W)	200 LF	2,000	SF	\$12	\$24,000.00	
		Curb Ramp	4	4	EACH	\$3,000	\$12,000.00	
		Sidewalk (5' W)	1100 LF	5,500	SF	\$8	\$44,000.00	
	North Church Avenue	Drive Apron (10' W)	120 LF	1,200	SF	\$12	\$14,400.00	
		Curb Ramp	2	2	EACH	\$3,000	\$6,000.00	
		Sidewalk (5' W)	530 LF	2,650	SF	\$8	\$21,200.00	
	Penny Lane	Drive Apron (10' W)	180 LF	1,800	SF	\$12	\$21,600.00	
		Curb Ramp	0	-	EACH	\$3,000	\$0.00	
		Sidewalk (5' W)	600 LF	3,000	SF	\$8	\$24,000.00	
	Tammell Street	Drive Apron (10' W)	0 LF	-	SF	\$12	\$0.00	
		Curb Ramp	4	4	EACH	\$3,000	\$12,000.00	
		Sidewalk (5' W)	800 LF	4,500	SF	\$8	\$36,000.00	
	Total of Work:							\$1,588,400.00
	East/West Streets	Thomas Street	Drive Apron (10' W)	200 LF	2,000	SF	\$12	\$24,000.00
			Curb Ramp	10	10	EACH	\$3,000	\$30,000.00
			Sidewalk (5' W)	3600 LF	18,000	SF	\$8	\$144,000.00
		Hirtle Street	Drive Apron (10' W)	120 LF	1,200	SF	\$12	\$14,400.00
			Curb Ramp	3	3	EACH	\$3,000	\$9,000.00
			Sidewalk (5' W)	680 LF	3,400	SF	\$8	\$27,200.00
		West Cherry Street	Drive Apron (10' W)	40 LF	400	SF	\$12	\$4,800.00
			Curb Ramp	0	-	EACH	\$3,000	\$0.00
			Sidewalk (5' W)	200 LF	1,000	SF	\$8	\$8,000.00
		Key Corner Street	Drive Apron (10' W)	220 LF	2,200	SF	\$12	\$26,400.00
Curb Ramp			6	6	EACH	\$3,000	\$18,000.00	
Sidewalk (5' W)			2350 LF	11,750	SF	\$8	\$94,000.00	
West College Street		Drive Apron (10' W)	300 LF	3,000	SF	\$12	\$36,000.00	
		Curb Ramp	10	10	EACH	\$3,000	\$30,000.00	
		Sidewalk (5' W)	1950 LF	9,750	SF	\$8	\$78,000.00	
Franklin Street		Drive Apron (10' W)	0 LF	-	SF	\$12	\$0.00	
		Curb Ramp	2	2	EACH	\$3,000	\$6,000.00	
		Sidewalk (5' W)	200 LF	1,000	SF	\$8	\$8,000.00	
East Cherry Street		Drive Apron (10' W)	120 LF	1,200	SF	\$12	\$14,400.00	
		Curb Ramp	0	-	EACH	\$3,000	\$0.00	
		Sidewalk (5' W)	450 LF	2,250	SF	\$8	\$18,000.00	
East College Street		Drive Apron (10' W)	480 LF	4,800	SF	\$12	\$57,600.00	
		Curb Ramp	12	12	EACH	\$3,000	\$36,000.00	
		Sidewalk (5' W)	3270 LF	16,350	SF	\$8	\$130,800.00	
Tyus Street		Drive Apron (10' W)	220 LF	2,200	SF	\$12	\$26,400.00	
		Curb Ramp	4	4	EACH	\$3,000	\$12,000.00	
		Sidewalk (5' W)	1350 LF	6,750	SF	\$8	\$54,000.00	
Tamm Street		Drive Apron (10' W)	0 LF	-	SF	\$12	\$0.00	
		Curb Ramp	3	3	EACH	\$3,000	\$9,000.00	
		Sidewalk (5' W)	650 LF	3,250	SF	\$8	\$26,000.00	
Morning Drive		Drive Apron (10' W)	180 LF	1,800	SF	\$12	\$21,600.00	
		Curb Ramp	0	-	EACH	\$3,000	\$0.00	
		Sidewalk (5' W)	940 LF	4,700	SF	\$8	\$37,600.00	
Total of Work:							\$1,001,200.00	

City of Brownsville, Tennessee
 ADA Self-Evaluation and Transition Plan

Opinion of Probable Cost - Public ROW South of Main Street

ROW to be Replaced								
South of Main Street	Street Name	Description	Field Measure	Quantity	Unit	Unit Price	Amount	
North/South Streets	Owen Avenue	Drive Apron (10' W)	120LF	1,200	SF	\$12	\$14,400.00	
		Curb Ramp		2	EACH	\$3,000	\$6,000.00	
		Sidewalk (5' W)	700 LF	3,500	SF	\$8	\$28,000.00	
	South McLemore Avenue	Drive Apron (10' W)	220 LF	2,200	SF	\$12	\$26,400.00	
		Curb Ramp		2	EACH	\$3,000	\$6,000.00	
		Sidewalk (5' W)	880 LF	4,400	SF	\$8	\$35,200.00	
	South Russell Avenue	Drive Apron (10' W)	0 LF	-	SF	\$12	\$0.00	
		Curb Ramp		2	EACH	\$3,000	\$6,000.00	
	South Wilson Avenue	Sidewalk (5' W)	150 LF	750	SF	\$8	\$6,000.00	
		Drive Apron (10' W)	0LF	-	SF	\$12	\$0.00	
	Lafayette Avenue	Curb Ramp		3	EACH	\$3,000	\$9,000.00	
		Sidewalk (5' W)	500 LF	2,500	SF	\$8	\$20,000.00	
		Drive Apron (10' W)	80 LF	8,000	SF	\$12	\$96,000.00	
	South Washington Avenue	Curb Ramp		6	EACH	\$3,000	\$18,000.00	
		Sidewalk (5' W)	1000 LF	5,000	SF	\$8	\$40,000.00	
		Drive Apron (10' W)	180 LF	360	SF	\$12	\$4,320.00	
	Jackson Avenue	Curb Ramp		8	EACH	\$3,000	\$24,000.00	
		Sidewalk (5' W)	3740 LF	18,700	SF	\$8	\$149,600.00	
		Drive Apron (10' W)	0 LF	-	SF	\$12	\$0.00	
	Hatchie Avenue	Curb Ramp		4	EACH	\$3,000	\$12,000.00	
		Sidewalk (5' W)	1300 LF	6,500	SF	\$8	\$52,000.00	
		Drive Apron (10' W)	240 LF	2,400	SF	\$12	\$28,800.00	
	Anderson Avenue	Curb Ramp		6	EACH	\$3,000	\$18,000.00	
		Sidewalk (5' W)	3610 LF	18,050	SF	\$8	\$144,400.00	
		Drive Apron (10' W)	360 LF	3,600	SF	\$12	\$43,200.00	
							Total of Work:	\$887,920.00
	East/West Streets	East Main Street	Drive Apron (10' W)	380 LF	3,800	SF	\$12	\$45,600.00
			Curb Ramp		0	EACH	\$3,000	\$0.00
			Sidewalk (5' W)	4900LF	24,500	SF	\$8	\$196,000.00
		West Main Street	Drive Apron (10' W)	780LF	7,800	SF	\$12	\$93,600.00
			Curb Ramp		26	EACH	\$3,000	\$78,000.00
			Sidewalk (5' W)	6400LF	32,000	SF	\$8	\$256,000.00
		South Court Square	Drive Apron (10' W)	0 LF	-	SF	\$12	\$0.00
			Curb Ramp		2	EACH	\$3,000	\$6,000.00
			Sidewalk (5' W)	200 LF	1,000	SF	\$8	\$8,000.00
		Jefferson Street	Drive Apron (10' W)	760 LF	7,600	SF	\$12	\$91,200.00
			Curb Ramp		4	EACH	\$3,000	\$12,000.00
			Sidewalk (5' W)	4040LF	20,200	SF	\$8	\$161,600.00
		Margin Street	Drive Apron (10' W)	315 LF	3,150	SF	\$12	\$37,800.00
			Curb Ramp		10	EACH	\$3,000	\$30,000.00
			Sidewalk (5' W)	3135 LF	15,675	SF	\$8	\$125,400.00
		Cooper Street	Drive Apron (10' W)	273 LF	2,730	SF	\$12	\$32,760.00
Curb Ramp				2	EACH	\$3,000	\$6,000.00	
Sidewalk (5' W)			1427 LF	7,135	SF	\$8	\$57,080.00	
Wyatt Street		Drive Apron (10' W)	0 LF	-	SF	\$12	\$0.00	
		Curb Ramp		0	EACH	\$3,000	\$0.00	
		Sidewalk (5' W)	1000 LF	5,000	SF	\$8	\$40,000.00	
Hill Street		Drive Apron (10' W)	0 LF	-	SF	\$12	\$0.00	
		Curb Ramp		0	EACH	\$3,000	\$0.00	
		Sidewalk (5' W)	150 LF	750	SF	\$8	\$6,000.00	
						Total of Work:	\$1,283,040.00	

Opinion of Probable Cost - ROW Compliance - Signalized Intersections

ROW at Intersections to be Replaced	Description	Field Measure	Quantity	Unit	Unit Price	Amount
Grand Avenue / West Main Street - Signalized Intersection	Curb Ramps		8	EACH	\$3,000	\$24,000.00
	Audible signal	No	4	EACH	\$2,000	\$8,000.00
North Park Avenue / East Main Street- Signalized Intersection	Curb Ramps		6	EACH	\$3,000	\$18,000.00
	Audible signal	No	4	EACH	\$2,000	\$8,000.00
Anderson Avenue / East Main Street - Signalized Intersection	Curb Ramps		6	EACH	\$3,000	\$18,000.00
	Audible signal/ Ped Signal	No	3	EACH	\$10,000	\$30,000.00
N. Washington Ave. / Thornton Rd. - Signalized Intersection	Curb Ramps		6	EACH	\$3,000	\$18,000.00
	Audible signal	No	4	EACH	\$2,000	\$8,000.00
E. Jefferson St. / S. Dupree St. - Signalized Intersection	Curb Ramps		2	EACH	\$3,000	\$6,000.00
	Audible signal	No	4	EACH	\$2,000	\$8,000.00
Wal Mart North Access Dr. / S. Dupree St. - Signalized Intersection	Curb Ramps		6	EACH	\$3,000	\$18,000.00
	Audible signal	No	4	EACH	\$2,000	\$8,000.00
Total of Work:						\$172,000.00

Additional Recommendations

A key component to ensuring ROW facilities remain usable, whether they are fully compliant or not, is to perform required maintenance activities in a manner that does not reduce accessibility. This maintenance can be performed by adjacent property owners, contractors, or City staff. Examples of maintenance activities that may be required within the public ROW include:

- Vegetation – proper maintenance of grass, landscaping, shrubs, and trees adjacent to sidewalks are vital to ensuring compliance with the standards. Over time, sod can grow over the sidewalk and not only reduce the width, but also prevent proper drainage. Taller vegetation can grow into the sidewalk, creating an obstruction and/ or protrusion.
- Obstructions and Protrusions – when utility poles, signs, and other objects are replaced, it is important to make sure that they are moved out of the pedestrian access route to the greatest extent possible and obstructions and protrusions are eventually eliminated. Items such as utility poles, hydrants, street signs, mailboxes, etc. can all be relocated as part of regular maintenance activities.

- Level Changes – displacement of surfaces from an adjacent surface creates trips hazards to all users. The causes of these level changes vary and short term fixes can be considered until such time as a sidewalk project is completed. Minor level variances can either be beveled or grinded level. More severe elevation changes may require something more extreme, such as temporary patching material being placed to remove a vertical level change.

Plan Updates and Enforcement

Improvements eliminating the deficiencies identified should be tracked to show progress in increasing accessibility within the community and to ensure the City is following through on the commitments made herein.

The Transition Plan will be reviewed and updated periodically to ensure the City is continuing to improve the accessibility within their public right-of-way, and that it is current to properly serve areas of development.

