

# CITY OF ALCOA, TENNESSEE

## *Americans with Disabilities Act* Self-Evaluation and Transition Plan



**FINAL VERSION**

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Prepared by:



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Figure 1-1 – Alcoa Location Map

Figure 1-2 – Alcoa Facilities Location Map

## **APPENDICES**

Appendix A – Building Facilities and Parks Physical Barrier Summaries

Appendix B – Public Right-of-Way Facilities Summaries

Appendix C – City Questionnaires

Appendix D – Public Outreach

Appendix E – Forms and Notices

## 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  
ADASAD – 2010 Americans with Disabilities Act Standards for Accessible Design  
CDBG – Community Development Block Grant  
BEOP – Blount County Basic Emergency Operations Plan  
CFR – Code of Federal Regulations  
D.A.R.E. – Drug Abuse Resistance Education  
DOJ – U.S. Department of Justice  
DOT – U.S. Department of Transportation  
DW – Detectable Warnings  
EEOC – Equal Employment Opportunity Commission  
EMS – Emergency Medical Services  
FHWA – U.S. DOT Federal Highway Administration  
FTA – U.S. DOT Federal Transit Administration  
G.E.D. – General Educational Development or General Educational Diploma  
GIS – Geographic Information System  
HR – Human Resources Department  
HTML - Hyper Text Markup Language  
ICC – International Code Commission  
ISA – International Symbol of Accessibility  
IT – Information Technology  
MOT – Maintenance-of-Traffic  
NCA – National Center on Accessibility  
PAR – Pedestrian Access Route  
PCA – Pedestrian Circulation Area  
PDF – Portable Document Format  
PROWAG – 2011 Proposed Accessibility Guidelines for Pedestrian Facilities within Public Right-of-Way  
RA – Rehabilitation Act of 1973  
ROW – Right-of-Way  
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 provides 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 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 Alcoa (City) has completed a self-evaluation of all City facilities. This includes facilities within the public right-of-way (ROW), programs, and procedures. A Transition Plan that outlines the necessary steps to be fully compliant with the requirements of Title II of the ADA has also been prepared. Alcoa has made efforts over the years to improve accessibility, including the completion of this Self-Evaluation and Transition Plan (SETP). The City will strive to ensure that all residents and visitors can access all services, programs, and activities. All formal grievances filed will be promptly investigated according to the grievance procedures outlined. Additionally, the City will strive to include annual budgetary allotments to make required improvements that will eventually ensure all facilities are fully accessible. Emphasis will be given to improvements that have the greatest impact upon the capability of persons with disabilities to access facilities or programs. Where access cannot be attained, alternatives to offer the same opportunities to persons with disabilities will be provided.

In performing the self-evaluation, the following facilities were identified as having programs/services provided:

### City Facilities (Owned, Leased, or Hosting Programs)

- Alcoa Little League
- Alcoa Municipal Building
- Alcoa Police Firing Range
- Alcoa Public Safety Building (Police Station and Fire Station 1
- Fire Station 2
- Fire Station 3
- Landfill
- MLK Community Center
- Service Center/Credit Union
- Springbrook Recreation Center

- Water Filtration Plant

### City Parks

- Alcoa Duck Pond
- Bassell Courts
- Hall Park
- Howe Street Park
- Maryville-Alcoa Greenway
- Rock Garden Park
- Springbrook Park
- Springbrook Pool

Facilities evaluated generally included areas open to the public and employee areas that are not deemed as work areas (common use areas). Public areas included parking lots, walks, park/site amenities, and areas within buildings that are not restricted to employees, such as restrooms, meeting spaces, reception areas, stairways, elevators, and hallways. Buildings or areas of certain buildings having infrequent public access were evaluated under the same guidelines. Typical employee common use areas evaluated included break rooms, employee restrooms, locker rooms, conference rooms, etc. Spaces dedicated as employee work areas are exempt from the self-evaluation process, however that does not obviate the need for the City to ensure

full accessibility is provided to employees with disabilities to be consistent with the requirements of Title I of the ADA.

In addition to City facilities, the self-evaluation reviewed existing City policies and procedures within each department. The focus of this review began with the distribution of a questionnaire to each department, followed by interviews gathering other data as needed in order to better understand the responses or the operation of 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 assist in accommodating 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 within 30 years, though this will be largely dependent on a number of economic factors and future changes to the ADA Standards for Accessible Design (ADASAD) 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 ADASAD standards.

The results of the self-evaluation identified a number of architectural barriers at City facilities. The estimated cost to correct these deficiencies is over **\$590,575**. In addition, there are approximately **\$4,460,987** in deficiencies on the various City greenways and **\$9,658,894** in pedestrian right-of-way facilities for a grand total of **\$14,710,456**. These deficiencies were identified based on evaluations by DLZ and subconsultant LDA Engineering. In some cases, the cost of corrective action could not be defined due to the need for additional investigation that is outside the scope of an ADA self-evaluation. Investigation of structural walls, plumbing and other utilities within walls, compliance with plumbing and other codes, etc., are examples of additional investigations that might make estimating costs impossible. 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 presented 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. In some cases, the priority was adjusted based on the type of facility and proximity to high use areas. The improvements will be categorized into a 30-year phasing program to spread out associated implementation costs and address the most serious deficiencies at City facilities that are utilized with the greatest frequency. 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. Note that these costs are to resolve accessibility issues by making architectural improvements and in many instances, there are procedural or other modifications that can be made to provide equal access to City programs while modifications are not required until renovations are completed. These modifications are noted within this report.

The statements and findings contained in this Transition Plan and supporting information are the opinion of DLZ based on our knowledge and interpretation of ADA requirements. Nothing in this document should be considered as legal advice. Clients are urged to seek appropriate legal assistance as needed on ADA issues.