

KINGSTON TENNESSEE

ADA Self-Evaluation & Transition Plan





Kingston, TN

ADA Self-Evaluation & Transition Plan

2019

Prepared By:



In Association with:



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Executive Summary

The Americans with Disabilities Act (ADA) was passed in 1990, adding to the civil rights statutes enacted over previous decades. The purpose of the Act is to end discrimination against individuals with disabilities in all areas of public life, including jobs, schools, transportation, and all public and private places that are open to the general public.¹

The ADA is divided into a number of Titles pertaining to the different areas of public life. Title II of the ADA requires that all public entities with 50 or more employees publish a notice of nondiscrimination, designate an ADA Coordinator, develop a formal complaint form and grievance procedure, perform a self-evaluation, prepare a transition plan, and make the transition plan available to the public. This plan is in response to those mandates.

Evaluation of City of Kingston policies, programs, and activities began with a survey questionnaire distributed and filled out by the City Manager in collaboration with the various department heads. The questionnaire included questions on the types and locations of public meetings and events, public resources including telecommunication and assisted listening devices, and previous requests for accommodation. The questionnaire also assessed whether the City had a designated ADA Coordinator and established ADA Notice and Grievance Procedures.

In 2019, the City of Kingston performed an inventory and evaluation of its public facilities, and an inventory and evaluation of sidewalks and curb ramps.

City facilities evaluated include the following buildings and parks:

City Buildings:

- Kingston Community Center
- Public Library
- Kingston City Hall
- Wastewater Treatment Facility
- Water & Maintenance Building

Parks:

- City Park
- Fort Southwest Point
- Gertrude Porter Memorial Park
- 58 Landing Park
- Fort Paws Dog Park
- Byrd Park
- Gravel Pit Park
- Ladd Park

Evaluations of these facilities were completed by Cannon & Cannon, Inc. Engineers and Surveyors (CCI) and findings were recorded and evaluated by Community Development Partners, LLC (CDP), in coordination with the City of Kingston. Evaluations of parks and buildings focused on public use

¹ <https://adata.org/learn-about-ada>

areas rather than employee areas. The major areas of evaluation include parking and access routes, public spaces connected to the provision of goods and services, public toilets, water fountains, and auxiliary services such as pay phones and emergency alarms. The evaluations also included a review of 10.8 miles of City sidewalks and 168 curb ramps.

As a result of the evaluation, the City identified that each facility contained non-compliant issues, and corrections would be needed for most sidewalks and curb ramps. The total probable cost for improvements to parks and buildings was estimated at **\$261,075**. An additional **\$1,446,000** was estimated for needed sidewalk improvements, and **\$360,000** was estimated for needed curb ramp improvements. This brings the total probable cost for needed ADA improvements in the City of Kingston to an estimated **\$2,067,075**.

Prioritizing these needed improvements provides the City with a framework for allocating budgets, time, and resources. After collection in the field, each of the needed improvements to remove barriers or deficiencies were prioritized as “High”, “Medium”, or “Low”. In general, “High” priority barriers are those that had major deterioration, presented safety issues, or contained elements that would inhibit access for all users. “Medium” priority barriers include those that would affect the access and use of major goods and services or restrooms, or impact certain users from accessing public spaces due to narrow walkways or poor surface conditions. “Low” priority barriers include minor and infrequent barriers along access paths and walkways as well as non-compliant crosswalk signals and other issues that could be easily addressed. These priorities were further refined by incorporating the estimated volume of facility use and pedestrian traffic, as well as the direct feedback of City officials and the public gathered during a public meeting and several advisory committee meetings.

It is the intent of the City to implement these needed ADA improvements over the next 30 years. This timeframe was discussed with the City of Kingston during the planning process, and it is feasible that the costs of these improvements could be addressed over that period. The actual implementation of needed improvements will depend on how the City balances these ADA improvement priorities with other funding needs. Implementation may also be impacted by changing and evolving regulations, as well as complaints received by the public. The costs and priorities listed are for physical improvements only and do not include policies and program changes, which may impact the overall costs and timeline.

The statements and findings contained in this Transition Plan and supporting information are the opinion of CDP; 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.

Introduction and Overview

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

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

Title II of ADA pertains to the programs, activities and services public entities provide. As a provider of public programs and transportation services, the City of Kingston must comply with this section of the Act as it specifically applies to public service agencies. Title II of ADA states that, “...no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such entity.” ([42 USC. Sec. 12132](#); [28 CFR. Sec. 35.130](#))

As required by Title II of [ADA, 28 CFR. Part 35 Sec. 35.105 and Sec. 35.150](#), the City of Kingston has conducted a self-evaluation of its buildings, parks, and facilities within public rights of way and has developed this Transition Plan detailing how the organization will ensure that all of those facilities are accessible to all individuals.

The ADA addresses two types of accessibility:

- Program accessibility
- Facility accessibility

Facility accessibility describes whether a building or structure is 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. The regulation implementing Title II, 28 CFR Part 35 (as amended September 15, 2010) contain two “safe harbor” provisions. Under the first “safe harbor” provision, elements of existing facilities that already comply with either the 1991 ADA Standards or Uniform Federal Accessibility Standards (UFAS) are not required to comply with the 2010 ADA Standards unless they were altered on or after March 15, 2012. Under the second “safe harbor” provision, elements comprising a path of travel to an altered primary function area is not required to comply

with the 2010 ADA Standard merely as the result of an alteration to a primary function area, provided those elements comply with the 1991 ADA Standard or UFAS.

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. This 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. [[28 CFR 35.130\(a\)-\(b\)\(1\) \(vii\)](#)]
- Provide programs, services, and activities in an integrated setting, unless separate or different measures are necessary to ensure equal opportunity. [[28 CFR 35.130\(b\)\(2\); \(d\)](#)]
- Absorb any costs necessary to ensure nondiscriminatory treatment, such as making modifications required to provide program accessibility or providing qualified interpreters. [[28 CFR 35.130\(f\)](#)]
- Allow a person with a disability to participate in a program, service, or activity regardless of disability. [[28 CFR 35.130\(g\)](#)]
- 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. [[28 CFR 35.130\(b\)\(8\)](#)]
- Modify policies, practices, or procedures that deny equal access to individuals with disabilities. [[28 CFR 35.130\(b\)\(7\)](#)]
- Furnish auxiliary aids and services when necessary to ensure effective communication. [[28 CFR 35.160\(b\)\(1\)-\(2\)](#)]
- Provide appropriate signage and structural communication to inform and alert individuals with visual, mobility, and hearing disabilities. [[28 CFR 35.163](#)]

- 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. [[28 CFR 35.150\(b\)\(1\)](#)]
- Ensure that newly constructed or altered buildings and facilities are free of physical and communication barriers that restrict accessibility of people with disabilities. [[28 CFR 35.151](#)]

Implementation of improvements and updates will be provided to the best extent possible. The City will continue to use department and public feedback from meetings and surveys to prioritize the ADA needs of the community.



Self-Evaluation – City Policies, Services, Activities and Programs

Introduction

The City's ADA Coordinator, working with an ADA Advisory Team and participants from each of the City's Departments, conducted a self-evaluation of city policies, services, activities, and programs to ensure that they are accessible to and usable by persons with disabilities. Examinations were completed to determine inaccessible programs, services, and activities in order to create the appropriate priorities. The ADA Compliance Coordinator worked with the ADA Advisory Team and involved participation of all city departments.

A questionnaire was also completed to evaluate compliance of policies, programs, and activities in the City of Kingston. This questionnaire asked City Officials about public meeting locations, compliance for employment within the City of Kingston, accommodations for persons with disabilities, and accessibility features within local and government facilities that allow for accessible programs. The responses provided were helpful in learning the about overall accessibility of City policies and programs as well as what needs further evaluation and updating.

Overall findings

- A poster entitled "Equal Opportunity is the Law", defining the requirements of Title VII, was observed in most City buildings.
- The City of Kingston adopted Resolutions for ADA guidelines as of January 14, 2020.
- ADA compliance and documents are listed on the City of Kingston's webpage for Policies and Procedures at: <https://kingstontn.gov/policiesprocedures/>.
- Public meeting locations that are open to the public include the City Hall Conference Room and Council Room, Community Center Meeting Rooms, and the Library
- None of the City's public meeting locations was found to contain Telecommunication device for the deaf (TDD) and assistive listening system (ALS) for persons with hearing impairments. City Hall was equipped with an audio system (microphones and speakers).
- Water Department Office Personnel have assisted customers with writing checks, have accepted payments or signatures at customer vehicles to assist those with mobility impairments, have used intercoms, and have met outside of the office to assist hearing impaired customers.
- Meetings are recorded by BBB Communications and then rebroadcasted and are also posted on the Kingston YouTube channel.
- The city of Kingston has assigned an ADA coordinator and complaint representatives as noted in the Grievance/Complaint procedures in [Appendix F](#).
- No general complaints were noted in the City Questionnaire present to the City of Kingston

Public Notices/Information

The City of Kingston has documented their Public Notices and Grievances under the Americans with Disabilities Act of 1990 in accordance with [Title II](#) of the ADA. Kingston is an equal opportunity employer and does not discriminate against persons with disabilities within the hiring process in compliance with guidelines set in place by the U.S. Equal Employment Opportunity Commission under Title II. The City of Kingston's Notice under the Americans with Disabilities Act is available on their web page for City policies and procedures at:

<https://kingstontn.gov/policiesprocedures/>

Kingston is making efforts to become fully compliant in regard to any and all persons with disabilities in the community. The City strives to provide effective communication, adequate assistance, and ample support in order to ensure equal opportunity for citizens to participate in programs, services, and activities within the community. This may include making information accessible and/or adjustments to ensure accessibility for individuals with hearing and vision disabilities.

An "Equal Opportunity is the Law" poster is posted in the following locations:

City Hall – Main Hallway	Water Plant - Hallway
Fire Dept – 2 nd Floor	Water Distribution - Breakroom
Community Center – Breakroom	Waste Water Treatment – Hallway
Library – Catalog Office & Outside	Street Dept – Shop Bulletin Board

These posters describe the requirements of Title VII of the Civil Rights Act. Posted information also includes the City of Kingston's public notices for ADA such as the [Notice under the Americans with Disabilities Act](#), as well as the City of Kingston [Grievance Procedure](#) Under the Americans with Disabilities Act.

Recommendations

- The Notice of Non-Discrimination should be used by all departments for all City publications and printed materials as applicable.
- The City should increase outreach to persons with disabilities by implementing additional methods to disseminate information about meetings and other City activities.
- The City should inform the public of the possible modifications required to make its services, programs, and activities more accessible.

Grievance/Complaint Procedure

The City of Kingston has implemented Grievance and Complaints procedures in order to allow for ample consideration of all complaints and concerns in regard to accessibility. Any and all complaints or concerns from individuals or from persons with disabilities regarding barriers to accessing programs, services, and activities should be directed to the designated ADA coordinator.

Mrs. Marsha Marshall, ADA Coordinator

City of Kingston
900 Waterford Place
Kingston, Tn 37763
(865) 376-6584

Marsha.Marshall@kingstontn.gov

The complaint should be submitted by the grievant and/or his/her designee as soon as possible but no later than 60 calendar days after the alleged violation. Responses to complaints will be considered and discussed in order to reach the proper resolutions and forms of action. If proper resolutions are not provided, then the plaintiff may appeal within 15 days and should be directed to the Kingston City Manager listed below:

David L. Bolling

City of Kingston
900 Waterford Place
Kingston, TN 37763
Office: (865) 376-6584 Ext. 1102

david.bolling@kingstontn.gov

All complaints and grievances are to be recorded and held by the City of Kingston for a maximum of 3 years. No general complaints were noted in the City Questionnaire filled out by the City of Kingston.

Recommendations

- 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 review its current administrative policy and be able to provide the recommended ADA Grievance Form in alternate accessible formats, i.e. Braille, e-text, large print, etc.

Public Meetings

Per [ADA 28 CFR 35.150 \(a\)\(1\); \(b\)\(1\)](#), part A of Title II “prohibits discrimination on the basis of disability by public entities”. This section applies to any public meetings that occur in the City of Kingston and ensures nondiscrimination within the state and local government facilities and services.

Public meetings were held regularly during the development of this plan to allow for discussion and for concerns to be recorded and included in the transition plan, as necessary.

A list of public meeting locations and their addresses were provided in response to the Americans with Disabilities Act Self-Evaluation Programs, Services, and Activities Questionnaire distributed and filled out by the Kingston administration in February 2020. Public meeting locations include the City Hall Conference Room and Council Room, Community Center Meeting Rooms, and the Library. A typical agenda was provided by the City as an example of meeting communication methods. A copy of this agenda is included in [Appendix F](#).

The Council room at City Hall has an audio system (microphones and speakers) but no assistive listening device for the hearing impaired, and no other location was found to have an audio system or assistive listening devices. Meetings are recorded by BBB Communications and then rebroadcasted and are posted on the YouTube channel. Meetings are publicized via Newspapers, the Kingston website, and Facebook page. City Council Agendas are posted on the city’s website at <https://kingstontn.gov/minutes-agendas/>. Agendas were not found to contain an ADA statement of Accommodation.

Recommendations

- All City meeting agendas should include a statement of accommodation for persons with disabilities
- Microphones and speakers should be installed in all public meeting rooms to ensure accessible communication for persons with disabilities.
- An assistive listening system (ALS) is needed in rooms that require one and an adequate number of receivers should be available.
- When an ALS is available, compliant signage that includes the International Symbol of Access for Hearing Loss should be installed outside of both the Commission Chambers and large conference rooms.
- 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.
- Provide meeting agendas and minutes in alternative formats when requested.

Communication Formats

Per the [ADA Effective Communication Requirements](#), “the ADA requires that Title II entities (State and local governments) communicate effectively with people who have communication disabilities. The goal is to ensure that communication with people with these disabilities is equally effective as communication with people without disabilities”. The City of Kingston should be able to provide, upon request, accommodating and necessary ways to carry out proper communication to persons with disabilities, including:

- Handwritten communication and translation
- Oral language interpreter
- Braille
- Sign-language
- Any other forms of communication for those with visual, hearing, or speech disabilities

As stated in The City of Kingston’s [Notice under the Americans with Disabilities Act](#), anyone who would like to request an auxiliary aid or service for effective communication, modification of policies or procedures, should contact ADA Coordinator Marsha Marshall at Marsha.Marshall@kingstontn.gov or at (865) 376-6584 as soon as possible, at least 72 hours before the activity, event, or meeting.

Currently, no city buildings or meeting locations have assisted listening devices.

Recommendations

- No City facility had a form of Telecommunication device for the deaf (TDD). These devices should be installed in order to ensure accessible communication.
- The City should provide staff training and information regarding auxiliary aids and effective communication.
- Encourage staff to offer alternate means to complete transactions and assistance to complete City forms if possible.
- Compliant signage that includes the International Symbol of Access for Hearing Loss should be provided outside of all rooms that provide an Assistive Listening Systems and Devices
- The City should maintain a complete list of auxiliary service providers, i.e. Braille transcription services, computer assisted transcript, dictation and transcription, American Sign Language (ASL) interpreters, etc.

Ordinances and Standards

[Title II](#) entities typically have a number of documents that specify requirements, design standards, and other requirements for construction of facilities. Often, these documents reference pertinent guidance, such as those provided by TDOT, International/State Building Codes, etc.

As of January 14, 2020, the City of Kingston fully adopted resolutions for ADA guidelines for the 2010 ADAAG and the 2011 Public Right-Of-Way Accessibility Guidelines (PROWAG). These guidelines are outlined and set forth in Resolution 20-01-14-1 and Resolution 20-01-14-2 and ensure that the city of Kingston follows ADA guidelines for both new and ongoing projects.

These resolutions were signed by the Mayor and attested by the City Clerk. A copy of these resolutions is provided in [Appendix A](#).

Recommendations

- Continue to utilize known standards (PROWAG and ADAAG) for consistency.
- Provide further training for plan reviewers and field inspectors on ADA requirements for facilities and ensure that design plans meet the standards and construction meets the design plans.

Information and Signage

According to ADA section [§35.163](#) (part A), public entities within a city should ensure that all individuals, including those with disabilities, are provided adequate information and direction to accessible services and facilities. This information should be sufficient for disabilities that include but are not limited to impaired vision or hearing. Part B concludes that public entities should ensure that all entrances that are inaccessible to persons with disabilities should provide information and signage with directions to alternative entrances that provide proper accessibility. Additionally, the accessibility symbol should be clearly visible at each accessible entrance.

Recommendations

- An accessible signing strategy for the non-compliant City facilities should be developed for interior and exterior directional, informational, and permanent room signage.
- Standards for accessible signs should be created to guide production and installation of accessible signage.

Staff Training

The City of Kingston ensures proper training for each individual according to the position held and strives to encourage their employees to seek out their maximum potential in the workplace.

No ADA training was noted for police personnel or non-police personnel in the Kingston Citywide ADA Questionnaire.

Recommendations

- The ADA Coordinator and other key staff should consider annual training on various ADA issues relevant to their respective department responsibilities.
- Training should be implemented in order to fit each job function.
- The City should provide training regarding ADA and related civil rights legislation. Suggested training topics include, but are not limited to:
 - ADA Title II requirements
 - Aspects of non-compliance
 - Disability Etiquette – including acceptable terminology
 - Accommodations for persons with disabilities
 - Accessible meeting locations
 - Communication aids and services – TDD/TTY
- Training materials and handbooks should be prepared if needed and include alternate formats for persons with disabilities.

Employment

Title I of the ADA requires public entities not to discriminate against persons with disabilities in all parts of the recruitment and employment process ([28 CFR 35.140](#) and [29 CFR 1630.4](#)).

“Be an equal opportunity employer by granting and providing equal opportunities in employment, job application procedures, hiring, separation, job training, promotions, pay, benefits, and other compensation, privileges, terms and conditions of employment without regard to race, color, creed, religion, national origin, gender, age, disability or political affiliation.”

The City of Kingston created their Personnel Policies and Procedures that were adopted on May 30, 2017. This document includes 12 sections that outline what should be expected by future employees within the City of Kingston. These sections include sections on the City’s purpose and objectives for all employees, the City’s Personnel Policy Statement, and a statement indicating the coverage of City Personnel Policies and Procedures.

Emilye Guge with Kingston Human Resources has been designated as ADA Title I (Employment) coordinator and can be reached by phone: (865) 376-6584 ext. 1101, or by email: emilye.guge@kingstontn.gov. The City Human Resources (HR) Department performs functions of general human resources by providing services to job applicants, City employees, and retirees.

Information on employment in the City of Kingston can be found at:

<https://kingstontn.gov/personnel-hiring-etc/>

Recommendations

- The City should continue to practice the City policies of non-discrimination as required by ADA and other applicable laws.
- Consider including a Grievance Form that includes all required information consistent with the grievance procedures and post it in places of City employment.
- Members of the public, including individuals with disabilities and groups representing individuals with disabilities, should be encouraged to submit suggestions to the City ADA Coordinator and HR Department on how the City might better meet the needs of individuals with disabilities pursuant to employment policies.
- Supervisors, department heads, and personnel departments should be trained and ready to assist with questions and concerns with city policies and procedures or issues within employment

Emergency Evacuation Procedures

The City is required to establish emergency evacuation procedures to safely evacuate persons with disabilities who may need special assistance in an emergency. These plans and procedures should include identification of assembly locations for persons with disabilities in each facility, staff assigned to ensure that assembly areas are checked prior to leaving buildings during an emergency, identification of assembly locations for pickup and transport of persons with disabilities, and location of accessible shelters to be used for various types of emergencies.

City Hall, the Library, the Community Center, Fire Dept., Street Department, Waste Water Treatment Plant, and Water Treatment Plant were all found to have their own Emergency Evacuation Procedure. No other emergency evacuation procedures were noted.

Recommendations

- City officials should work with the Kingston's emergency services and first responders in order to maintain emergency evacuation plans and procedures for all public facilities.
- Plans and procedures should be fitting to each facility and ensure proper accommodation to persons with disabilities as well as the consideration of caregivers.
- The ADA Coordinator should work with City officials to implement the ADA checklist for emergency evacuation procedures that can be found at:
www.ada.gov/pcatoolkit/chap7emergencymgmtadd1.htm

Self-Evaluation – Public Facilities

Introduction

A self-evaluation of public facilities currently in use was conducted for the City of Kingston. The goal of this evaluation was to analyze and prioritize those facilities in need of improvement and/or implementation of ADA compliant features.

Title II of the ADA requires all public programs and services to be accessible, and as such, they must be maintained within facilities where programs and services are offered. Over the years, the ADA has provided local governments with increased flexibility in meeting this requirement while managing limited budgets and other community obligations. Structural changes to facilities are not always the best or only way to provide access to programs and services for users with disabilities. Where facilities are found to have structurally inaccessible elements, the programs and services could, for example, be relocated to an accessible facility, or the program or service can be provided in an alternate manner.

Project Approach

This section describes the general approach taken to evaluate public facilities in the City of Kingston for ADA accessibility. This part of the evaluation began by identifying the facilities owned by the City of Kingston and accessible by the public for programs and services. City officials, program administrators, and service providers were engaged early in the planning process to identify the following list of public facilities owned, leased, or hosting programs for the City of Kingston:

- Kingston City Hall
- Kingston Community Center
- Kingston Public Library
- City Park
- Fort Southwest Point
- Gertrude Porter Memorial Park
- Ladd Park
- Byrd Park
- Gravel Pit Park
- 58 Landing Park
- Fort Paws Dog Park
- Wastewater Treatment Facility
- Water & Maintenance Building

Data Collection

Once a full list of the facilities to be evaluated was finalized, a team of engineers was hired by the City to visit these facilities and conduct site evaluations in the summer and fall of 2019. The data was gathered in four general areas in accordance with the *ADA Checklist for Existing Facilities* (henceforth called the “Checklist”) published by the ADA National Network (2016)². Those **Four Areas** for ADA compliance include:

- Approach and entrance
- Access to goods and services
- Access to public toilet rooms
- Access to other features such as water fountains and public telephones

The engineers walked each of the facilities, took measurements of all elements listed in the Checklist, and recorded their findings for further evaluation. The location and nature of specific physical barriers to accessibility were also recorded, and photos were taken to provide evidence of issues and conditions.

Evaluation Criteria

The components under Section 3 of the *2010 ADA Standards for Accessible Design*³ (henceforth called the 2010 ADA Accessibility Guidelines, or “2010 ADAAG”) were considered to determine compliance of public facilities with accessibility standards for those with disabilities. These factors were also used to develop priorities for barrier removal. Each of these components were evaluated separately in identifying barriers and violations. It should be noted that compliance for one criterion does not indicate compliance for any of the other criteria. All data collected in the field was loaded into a database to evaluate needed improvements by type, severity, and overall cost estimates. The database was also used to generate tables and figures used during engagement with the City and general public.

Prioritization

Based on the evaluation criteria described above and the firsthand input of City officials, the advisory committee, and the general public, existing public facilities that contained non-compliant elements were given a priority for remediation. The following initial priorities were used to organize improvements needed within each facility:

² <https://adata.org/project/ada-checklist>, accessed 6/1/2019

³ Department of Justice, September 15, 2010, *2010 ADA Standards for Accessible Design*

High Priority – Accessible approach and entrance

Medium Priority – Access to goods and services and public toilet rooms

Low priority – Access to other items such as water fountains and public telephones

These priorities align with regulation for prioritization of facilities under Title III of the ADA but are equally applicable to local government facilities. These initial priorities were presented to the ADA advisory committee and were verified as matching the committee's priorities for improvements through a series of group exercises (more on the advisory committee and public process is provided under the [ADA Transition Plan](#) section).

The priorities give the City a framework for allocating funding during their regular budgetary process and for designating additional funds towards accessibility improvements as they become available.

Note on Cost Estimates

All cost estimates generated to remediate barriers and violations are planning level estimates, and do not replace the need for cost estimating prior to design and construction. The cost estimates provided in this plan also do not account for inflation, or policy changes that may increase the overall cost of engineering and construction. Cost estimates are for physical improvements only and do not account for cost of training or changes in policies and programs.

Note on Future Improvements

Under the ADA, all new and altered public facilities must be accessible for all users, including those with disabilities. All future facilities should be designed and built according to guidelines in the 2010 ADAAG, as adopted by the City of Kingston in Resolution 20-01-14-2 (See [Appendix A](#)).

Public Facility Inventory

Utilizing the [Project Approach](#) described above, Kingston's public facilities were evaluated for ADA compliance. This section of the plan summarizes this evaluation. The findings and recommendations contained in this section, combined with the input received from City officials and the public, provide the basis for specific improvements to accessibility for City facilities. Documentation of specific barriers encountered during the analysis are provided in [Appendix D](#). This inventory was organized into a prioritized need basis and reflects those areas that need the most attention as presented in the [ADA Transition Plan](#) section of this report.

Approach and Entrance

Maintaining an accessible approach and entrance to a facility is paramount to providing access to any of the public programs and services it provides. In accordance with the 2010 ADAAG and ADA Checklist, elements of the approach and entrance include parking, entrance pathways, and any doorways and vestibules, just to name a few.

The greatest number of violations encountered for approaches and entrances to Kingston facilities were insufficient or non-compliant ADA parking, running or cross slopes that were too steep along access routes, and inadequate signage near entrances. A full list of facility findings and needed corrections is provided in [Appendix D](#).

Access to Goods and Services

The ADA requires goods and services in public facilities to be accessible to all users, regardless of their physical ability. In accordance with the 2010 ADAAG and Checklist, accessibility of goods and services includes clear and accessible interior routes and doorways, fully compliant lifts or elevators where appropriate, appropriately dimensioned service counters, accessible seating areas, as well as compliant light switches and signage, just to name a few.

In Kingston, non-compliant doorway widths and hardware were the main issues encountered. Inadequate signage and non-compliant cross slopes along walkways also presented challenges in some locations. A full list of facility findings and needed corrections is provided in [Appendix D](#).

Access to Public Toilets

At least one restroom at public facilities should be accessible and be fitted with compliant equipment to accommodate all users regardless of physical ability. In accordance with the 2010 ADAAG and ADA Checklist, accessibility of public toilets includes signage, accessible entrances, maneuvering space within restrooms, accessible and compliant toilets, and accessible sinks and drying devices, just to name a few.

Some facilities evaluated in Kingston were found to have restrooms with a large number of non-compliant issues requiring renovation or reconstruction of at least one new restroom that is ADA compliant. Other facilities only required low-cost retrofits, such as modifications to doors or changing the heights of sinks and mirrors, in order to bring public toilet rooms into full compliance. A full list of facility findings and needed corrections is provided in [Appendix D](#).

Access to Other Items

Where they exist, public access shall be provided to items such as water fountains, public telephones, and emergency alarms. These items should be accessible to all users, regardless of physical ability.

In Kingston, most facilities provided access to these elements. In a few locations, deficient alarm controls will require replacement. A full list of facility findings and needed corrections is provided in [Appendix D](#).

Public Facility Findings Summary

After completion of the data collection, all field data was recorded and entered into a database for evaluation. Each facility was evaluated for compliance based on the factors described under the [Project Approach](#).

Stakeholder and public feedback were also paramount to the development of priorities. This feedback was used to adjust priorities and ensure that the final plan provides guidance that is responsive to needs expressed by the community (public input described in [ADA Transition Plan](#) section below). Ultimately, all violations and needed improvements were given a priority of high, medium, or low, based on the criteria listed under [Project Approach](#). The table below illustrates the level of compliance, relative priority and overall cost estimate for improvements needed for Kingston's public facilities.⁴

Priority	Priority Level			Total Cost Est. ⁵
	High	Medium	Low	
58 Landing Park	\$75,000	\$6,000	\$-	\$21,700
Byrd Park	\$4,500	\$9,500	\$-	\$29,350
City Hall	\$1,125	\$4,050	\$-	\$7,600
City Park	\$10,500	\$8,800	\$300	\$775
Community Center	\$7,500	\$14,100	\$-	\$26,150
Fort Paws Dog Park	\$6,400	\$22,500	\$-	\$3,750
Fort Southwest Point	\$22,500	\$4,500	\$-	\$12,750
Gertrude Porter Memorial Park	\$-	\$1,100	\$-	\$4,925
Gravel Pit Park	\$33,750	\$6,400	\$-	\$4,925
Ladd Park	\$1,500	\$6,200	\$-	\$1,750
Public Library	\$1,500	\$3,650	\$-	\$25,850
Wastewater Treatment Facility	\$750	\$7,900	\$-	\$5,500
Water & Maintenance Building	\$750	\$300	\$-	\$6,875
TOTAL	\$165,775	\$95,000	\$300	\$261,075

⁴ Please note, these priorities reflect the importance within each facility; a process including both the advisory committee and the public was carried out to develop priorities between the City's public facilities, documentation of which is provided in the [ADA Transition Plan](#) section below.

⁵ Costs are planning level estimates and do not replace need for cost estimating prior to design and construction. Costs include soft costs and contingencies, but do not include any property acquisition costs.

Of the City's 13 public facilities evaluated in this study, all of them contained non-compliant elements in the [Four Areas](#) discussed above. Most had non-compliant issues in more than one Area. The map below illustrates the location of the City's public facilities evaluated for this plan.

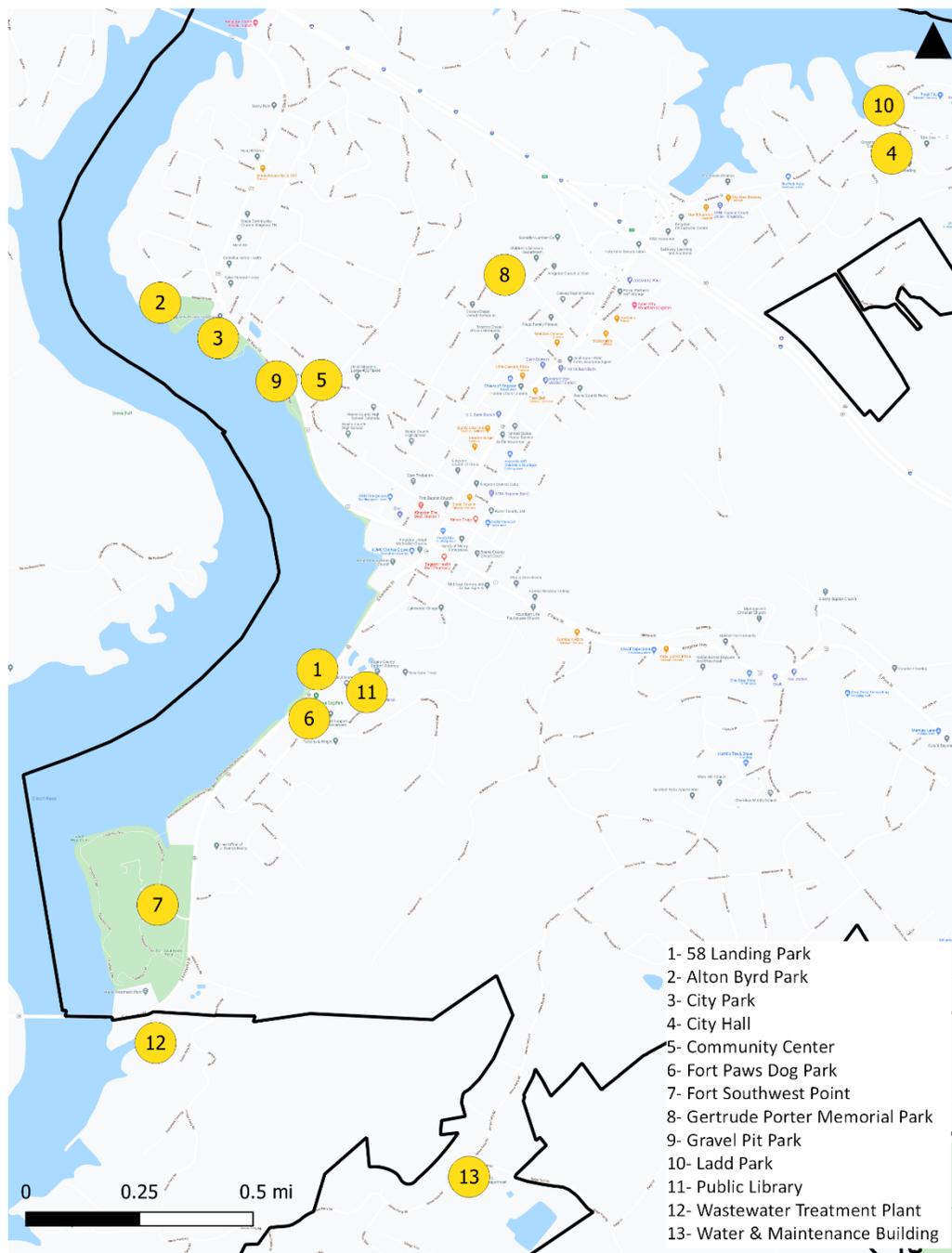


FIGURE 1, KINGSTON PUBLIC FACILITIES

A full list of facility findings and needed corrections is provided in [Appendix D](#).

Self-Evaluation – Pedestrian Facilities within the Right-Of-Way

Introduction

The City conducted a Self-Evaluation of pedestrian facilities to ensure that they are accessible to and usable by persons with disabilities. The ADA Coordinator worked with the ADA Advisory Committee, a team of consultants, and other City staff to complete the Self-Evaluation process for the appropriate facilities. The evaluations and process adhere to PROWAG requirements.

Title II of the ADA ([28 CFR Section 35.150 \(d\)](#)) requires state and local governmental entities to evaluate and develop a Transition Plan specific to curb ramps or other sloped areas at locations where walkways cross curbs. A curb ramp (or sometimes referred to as a curb cut) is a short sidewalk ramp cutting through a curb for access to that sidewalk by persons with disabilities.

There is no requirement under Title II of the ADA that requires sidewalks to be built where they do not yet exist. However, the City's existing sidewalks are considered part of program access, and as such, are required to be evaluated and accessibility barriers corrected based on priority and funding availability.

Project Approach

This section describes the general approach and steps taken to evaluate sidewalks and curb ramps within the City's public ROW. Included in this section are the methodology used to collect the data and the criteria used to evaluate facilities and prioritize improvements within the public ROW.

Pedestrian Access Routes (PAR)

Per [R105.5](#) 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." [R204.2](#) requires pedestrian access be provided within sidewalks and other pedestrian circulation paths located in the public right-of-way. These pedestrian access routes shall connect to accessible elements, spaces, and facilities that link building and facility entrances to public streets and sidewalks (**36 CFR 1191**). [R204.3](#) and [R204.4](#) note that pedestrian street crossings and pedestrian overpasses and underpasses are considered part of the pedestrian access route.

Per the Technical provisions of the PROWAG, the PAR consists of multiple elements that are listed in [R302.2](#), which must meet the following general criteria:

- R302.3 Continuous Width
- R302.4 Passing Spaces
- R302.5 Grade (Running Slope)
- R302.6 Cross Slope
- R302.7 Surfaces

To describe the compliance of the PAR more easily, it was necessary to break it out into logical and manageable sections. For this study, data was collected along the sidewalk at regular intervals and sidewalks were evaluated in logical sections. These sections include single block faces, portions of sidewalk with logical stopping points such as an alley or area with no sidewalk present, series of continuous or connected violations, and non-roadway related portions of public ROW such as a multiuse path.

Data Collection

The first step taken to evaluate facilities in the City's Public ROW was to conduct a full inventory of pathways and access routes within the public ROW. Available mapping, local knowledge, and satellite imagery was used to assess the location of existing pedestrian facilities. The locations of these facilities were reviewed by the City Manager, ADA Coordinator, and team of consultants for accuracy. The full inventory to be evaluated included **10.7 miles** of sidewalks and **168** curb ramps.

These pedestrian facilities were then inventoried using the latest PROWAG (*United States Access Board*, July 26, 2011). Data collection was completed in the field using digital tablets to record numerical data for criteria impacting the accessibility, and photos were taken at each point to provide evidence of issues and conditions. The location and nature of specific barriers to accessibility were also recorded along pedestrian routes. All data was collected during the fall of 2019.

Evaluation Criteria

The factors under section [R302.2](#) of the PROWAG were considered to determine compliance of sidewalks with accessibility standards for those with disabilities. These factors were also used to develop priorities for barrier removal. Each of these criteria were evaluated separately in identifying barriers and violations. It should be noted that compliance for one criterion does not indicate compliance for any of the other criteria. All data collected in the field was loaded into a geographic information system (GIS) to ensure accuracy with roadway dimensions and visualize logical segments, such as groups of connected violations, or breaks in continuous sidewalks.

Prioritization

Based on the evaluation criteria above and the firsthand input of City officials, the advisory committee, and other stakeholders from the public, the sidewalks that were found to be non-compliant were given a priority for remediation. These priorities give the City a framework for allocating funding during their regular budgetary process and for designating additional funds towards accessibility improvements as they become available.

Note on Cost Estimates

All cost estimates generated to remediate barriers and violations are planning level estimates, and do not replace the need for cost estimating prior to design and construction. The cost estimates provided in this plan also do not count for inflation, or policy changes that may change the overall cost of engineering and construction. Cost estimates are for physical improvements only and do not account for cost of training or changes in policies and programs.

Note on Future Improvements

Although the ADA does not require new pedestrian facilities to be constructed where they do not yet exist, it does require all new and altered pedestrian facilities to be accessible for all users. All future facilities should be designed and built according to guidelines in the PROWAG, as adopted by the City of Kingston in Resolution 20-01-14-2 (See [Appendix A](#)).

Sidewalk Inventory

Utilizing the [Project Approach](#) described above, current sidewalks within Kingston's public ROW were evaluated for compliance. This section of the plan summarizes this evaluation. The findings and recommendations contained in this section, combined with the input received from City officials and the public, provide the basis for specific recommended improvements to accessibility on city sidewalks. Documentation of specific barriers encountered during the analysis are provided in [Appendix E](#). This inventory was organized into priorities reflecting those areas that need the most attention as presented in the [ADA Transition Plan](#) section of this report.

Continuous Width & Passing Spaces

Per [R302.3](#) of the PROWAG, continuous clear widths for the PAR shall be a minimum of 4', exclusive of the curb and gutter. A width of 5' is preferred, and when the width is less than 5', passing zones with a minimum 5' width shall be installed at an interval of 200' or less. Wider passing areas were not a common design element in Kingston. Therefore, a width of 5' was used as the benchmark for compliance.

In Kingston, about 10% of the sidewalks evaluated contained sections that were less than 5' and marked as too narrow. Most of the narrow sidewalks were located along or near the waterfront or near Cherokee Middle School. Although a majority of sidewalks in Kingston were deemed to have an adequate width, the actual usable space may be less in some places due to surface conditions and cross slope of passing spaces, as discussed below.

Running Slope

Per [R302.5](#), the running slope of sidewalks shall not exceed 5% *or the grade of the adjacent street if the street is over 5%*. The second part of this requirement is significant for many cities in eastern Tennessee because they often contain a significant number of streets with a running slope that far exceeds 5%. Without this provision in the PROWAG, the amount of non-compliance for sidewalks would increase dramatically due to running slope issues.

During the PAR review process, it was deemed that none of the pedestrian facilities deviated from roadway grades. Therefore, running slope was not a major consideration during the evaluation of sidewalks for general accessibility.

Cross Slope

Per ADA [R302.6](#), the cross slope along the PAR shall be a maximum of 2%, with the exception of some pedestrian street crossings.

Cross slopes above the threshold of 2% were the most common reason for non-compliance for Kingston sidewalks. Over half of all sidewalk sections evaluated contained cross slopes that were non-compliant. Some of these non-compliant sidewalks had only minor deviations, and as such were still quite usable. However, there were also sections of sidewalk with severe cross slope issues.

Surface Conditions

Per [R302.7](#), the surfaces of pedestrian access routes and elements and spaces that connect to pedestrian access routes shall be firm, stable, and slip resistant.

The surface requirements in [R302.7](#) of the PROWAG apply to sidewalks and other pedestrian circulation paths, pedestrian crosswalks and rail crossings, pedestrian overpasses and underpasses and similar structures, and curb ramps and blended transitions. The surface requirements in [R302.7](#) also apply to surfaces at the following accessible elements and spaces that connect to pedestrian access routes:

- Clear spaces including those at operable aspects such as accessible pedestrian signals and pedestrian signal buttons, clear spaces for street furniture such as benches, and clear spaces within transit shelters, if applicable
- Boarding and alighting areas and boarding platforms at transit stops
- Accessible parking spaces and accessible passenger loading zones
- Ramp runs and landings

In Kingston, poor surface conditions were the second most common reason for non-compliance, and nearly one third of all sidewalk blocks contained some area with poor surface conditions. Some of the common failures in surface conditions include overgrown vegetation, heaving and crumbling, just to name a few. A number of areas had surface safety issues that were coupled with other barriers such as discontinuities and steep cross slopes. Areas with multiple issues such as this were given a higher priority for improvement during the evaluation process.

Obstructions & Protrusions

Per ADA [R402.2](#), 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.

Obstructions typically include light and utility poles, newspaper and mailboxes, vegetation, signs, hydrants, street furniture and site furnishings. Other barriers include, but are not limited to, manholes, valve covers, open grate castings, and access boxes. Obstructions can also be temporary in nature, including trash and recycling containers that are placed weekly at the curb on the PAR, and cars in residential driveways.

Obstructions or protrusions in the PAR can cause a wheelchair to tip over, become stuck or immobile, or lead to hazardous conditions for those with disabilities and those who may require a wheelchair.

Obstructions were discovered along 1.3 miles (12%) of Kingston's sidewalks. Most of these barriers were in the form of utility poles located in the PAR. In most of the sidewalks where obstructions were observed, other barriers were also noted, including crumbling surfaces, missing curb ramps, and steep cross slopes.

Discontinuities

Discontinuities are breaks between grades or changes between level surfaces along the PAR. Per [R302.7](#), a PAR shall not have a discontinuity greater than ½" total and those between a ¼" and ½" shall be beveled at a slope no steeper than 50% across the discontinuity between grades.

In Kingston, discontinuities between grades were noted on only about 4% of sidewalks. In most cases, these discontinuities were coupled with one or more additional non-compliant conditions, including poor surfaces, steep cross slopes, and other safety issues.

Missing Curb Ramps

If a sidewalk is provided but it abruptly ends with a drop-off at the end of a block without any advanced warning or signage, it can be extremely problematic and hazardous for a wheelchair user or person with a disability.

In Kingston about 9% of sidewalk sections assessed ended without curb ramps. These sidewalks were given a higher priority during the evaluation process because of the barrier and hazards they create for persons with disabilities.

The importance of missing curb ramps was highlighted by the community during Advisory Committee meetings, where safety considerations and a recent fatality were discussed.

Sidewalk Findings Summary

After completion of the data collection, all field data was recorded and entered into a database for evaluation. Each recorded location was evaluated for compliance based on the factors described under the [Project Approach](#). In addition to the criteria and conditions listed in the sidewalk inventory, a series of context-related factors were used to prioritize improvements within the public ROW. These factors include:

- Safety considerations
- Complaints received
- High pedestrian activity
- Areas with higher concentration of persons with disabilities
- Areas providing access to public accommodations

A geographic information system (GIS) was used to map the location of sections of sidewalks, crosswalks, and record spatial data, such as length, width, intersections, slope, and the location of violations. This GIS data was utilized during the planning process to interface with stakeholders and the public. A full set of the GIS data was provided to the City of Kingston at the end of the project to use in management of future improvement projects in the City.

Stakeholder and public feedback were also paramount to the development of priorities. This feedback was used to adjust priorities and ensure that the final plan provides guidance that is responsive to needs expressed by the community (public input described in [ADA Transition Plan](#) section below).

Ultimately, all violations and needed improvements were given a priority of high, medium, or low, based on the above criteria. The following table illustrates the level of compliance, relative priority, and overall cost estimate for needed improvements for the sidewalks evaluated in Kingston's public ROW.

Priority	Length (Mi)	Cost Est. ⁶
Compliant	3.8	\$0
Low	0.9	\$189,100
Medium	2.0	\$401,100
High	4.2	\$855,800
TOTAL	10.8	\$1,446,000

TABLE 1, SIDEWALK PRIORITIES FOR IMPROVEMENT

⁶ Costs are planning level estimates and do not replace need for cost estimating prior to design and construction. Costs include soft costs and contingencies, but do not include any additional ROW acquisition costs.

Of the City’s 10.8 miles of PAR evaluated in this study, 7.1 miles, or 66%, was deemed non-compliant due to one or more of the violations described above. For those sections deemed non-compliant, most had two or more non-compliant issues. The map below illustrates the location and priority for improvements to the PAR across the City.

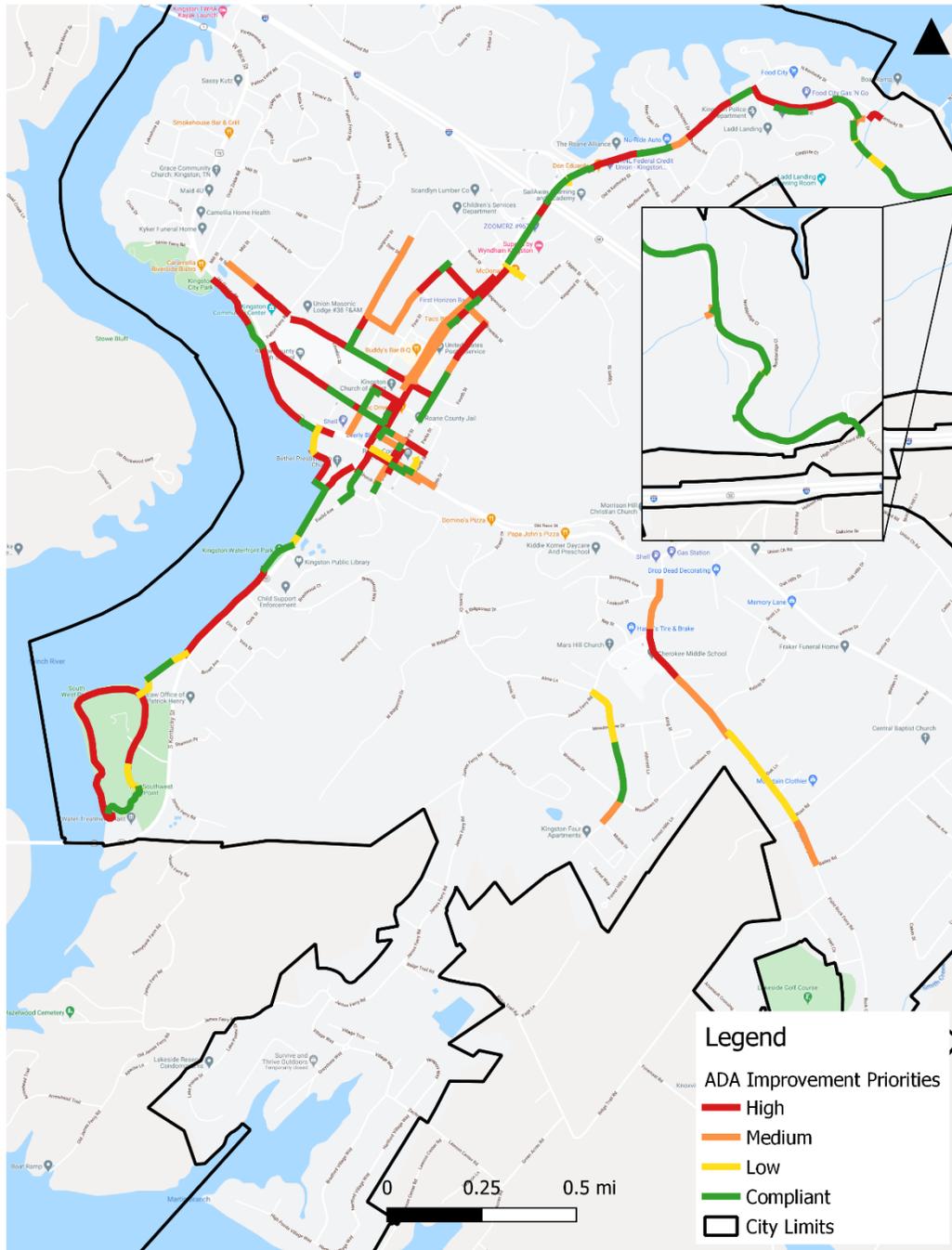


FIGURE 2, SIDEWALK EVALUATION AND PRIORITIZATION

A table containing the full evaluation data is provided in [Appendix E](#).

Curb Ramp Inventory

This section of the Transition Plan summarizes the review of existing curb ramps within Kingston's public ROW. The findings and recommendations contained in this section will provide the basis for specific improvements to accessibility for City curb ramps. The schedule for improvement of curb ramps will also be aligned with the priority and schedule for needed improvements for the associated sidewalks. A total of 168 City curb ramps were assessed and organized into a priority needs basis.

Curb Ramp Type

There are several types of curb ramps that provide access to sidewalks in Kingston's public ROW. In short, all curb ramps can be classified into a few main categories:

Parallel curb ramps include several ramp designs that run in the direction of the sidewalk and pedestrian route of travel. This is the recommended ramp for narrower sidewalks, where the PAR and grass strip together are less than 12' wide. In Kingston, parallel type curb ramps comprise most (84%) of the City's curb ramps.

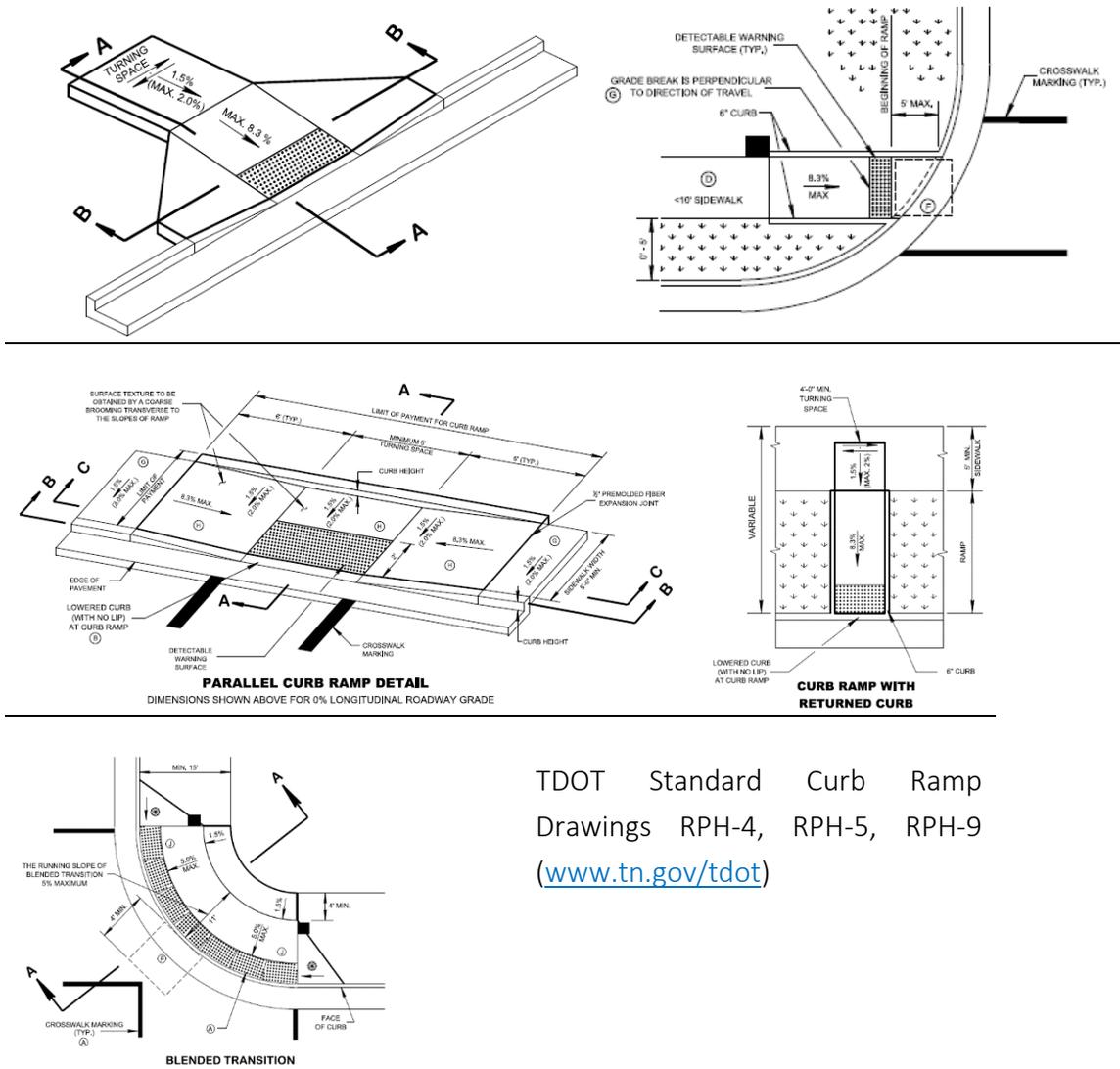
Perpendicular curb ramps are one of several ramp designs that run perpendicular to the direction of the sidewalk and the pedestrian route of travel. These curb ramps require a landing space to turn 90 degrees to enter the pedestrian route of travel. These types of curb ramps are only recommended where the PAR and grass strip are 12' wide or more. In Kingston, perpendicular type curb ramps only comprised 1% of the City's curb ramps.

Blended transitions are depressed corner crossings that provide access to bidirectional crosswalks. These curb ramps require a minimum 15' width in order to accommodate a grade of 5% or less on the ramp and a 4' area at the top of the ramp for turning movements to enter the pedestrian route of travel. In Kingston, blended transition curb ramps comprised 15% of the City's curb ramps.

The table below provides an overview of the category, and types of curb ramps inventoried during the evaluation process.

Category	Count	% of Ramps	Ramp Design Types ^{7,8}
Parallel	141	84%	Type 2, Type 1A
Perpendicular	2	1%	Type 1, Type 4, Type 4A, Type 6
Blended Transition	25	15%	Blended Transition
TOTAL	168	100%	

TABLE 2, CURB RAMP CATEGORIES AND DESIGN TYPES



TDOT Standard Curb Ramp Drawings RPH-4, RPH-5, RPH-9 (www.tn.gov/tdot)

⁷ Please note, in the case of all ramps, design and construction modifications may be required for curb ramps to be installed along a roadway with a running grade of more than 5%.

⁸ Detail on ramp design types provided by TDOT, <https://www.tn.gov/tdot/roadway-design/standard-drawings-library/standard-roadway-drawings/roadway-and-pavement-appurtenances/>

Curb Ramp Width

Per ADA [R304.5.1](#), the clear width of curb ramp runs (excluding any flared sides), blended transitions, and turning spaces shall be a minimum of 4 feet. The ramp width is typically measured at the point that the curb is at or near the same level as the street.

In Kingston, only 6% of curb ramps were found to be too narrow for PROWAG standards. These narrow ramps are primarily located in the downtown area, near the intersections of Race St and N Kentucky St.

Running Slope

Per [R304.3.2](#) of the PROWAG, the running slope of curb ramps should be in the same direction of sidewalk travel, and slopes shall be a minimum of 5 percent to a maximum of 8.3 percent, and shall not exceed 15 feet in length. Landings and turning spaces should have a maximum running slope of 2 percent.

Nearly 60% of all ramps had running slopes that were either too shallow or too steep, making this the most common reason for ramps to fail to meet ADA standards. For many of these ramps, the deviation from standards set forth in the PROWAG was minor, and as such, the ramps were still quite usable. However, for others, the running slope was quite steep, causing barriers or potential safety hazards. About half of the ramps with slope issues had other issues, such as discontinuities or poor surface conditions.

Cross Slope

Per [R304.5](#) of the PROWAG, the cross slope for curb ramps and transitions shall be a maximum of 2 percent. At pedestrian street and midblock crossings without yield or stop control, the cross slope is permitted to equal the grade of the street.

Most of the sidewalks evaluated in Kingston (84%) had compliant cross slopes. A few of the ramps that were measured with non-compliant cross slopes contained additional violations, such as non-compliant slopes, poor surface conditions, discontinuities, and missing detectable warning surfaces.

Surface Conditions and Discontinuities

Per [R304.7](#) of the PROWAG, curb ramps shall be firm, stable and slip resistant. Construction and maintenance shall follow best practices to provide planar and smooth surfaces. This section also provides guidelines for vertical discontinuities which should be avoided along ramps and at transitions. Such vertical discontinuities shall not be greater than $\frac{1}{2}$ " , and discontinuities between $\frac{1}{4}$ " and $\frac{1}{2}$ " should be beveled with a slope of no steeper than 50%.

About a third (31%) of the curb ramps evaluated in Kingston were non-compliant due to poor surface conditions and discontinuities. For a couple of the ramps, poor surface conditions had caused drainage issues.

Landings and Turning Spaces

Per PROWAG [R304.2](#) and [R407.6](#), landings and turning spaces are required to provide for adequate turning movements to access and use sidewalks. Landings are required at the top of ramps. Landings are also often used between ramp runs to ensure compliant ramp lengths and heights. Landings shall have the same minimum width as the adjoining ramps, shall have a minimum length of 5 ft, and shall have a maximum slope of 2 percent in any direction. Additional turning spaces are often needed to adequately navigate ramp and sidewalk transitions. Turning spaces shall be a minimum of 4 ft by 4 ft and have no more than a 2 percent cross slope. Both turning spaces and landings shall adhere to the same requirements for surface conditions as described above.

In Kingston, width and conditions of landings and turning spaces was not found to be a major issue at any of the ramps.

Detectable Warning Surfaces

Detectable warning surfaces provide tactile feedback about changing surfaces and potential traffic crossings. Per [R305](#) of the PROWAG, detectable warning surfaces shall consist of truncated domes aligned in a square or radial grid pattern. The detectable warning surfaces must be a minimum width of 2 feet and should extend to the back of the curb on either side of the ramp. The design of the detectable warning surface shall accommodate the type of curb ramp to ensure adequate coverage. Details on design of detectable warning surfaces for each curb ramp type are provided by the United State Access Board⁹.

During the evaluation, it was found that 35% of the curb ramps lacked the required detectable warning surfaces. All of these curb ramps also failed to meet PROWAG standards due to other issues such as non-compliant slopes, cross slopes, or surface conditions. The installation of these surfaces should be coordinated with the replacement of ramps throughout the City.

⁹ <https://www.access-board.gov/>

Curb Ramp Findings Summary

After completion of the data collection, all field data was recorded and entered into a database for evaluation. Each recorded location was evaluated for compliance based on the factors described in the [Curb Ramp Inventory](#). In addition to the criteria listed above, the general safety, condition and priority of adjoining sidewalks was considered in the prioritization of curb ramp improvements.

A geographic information system (GIS) was used to map the location of curb ramps and record spatial data such as length, width, intersections, slope, and the location of violations. This GIS data was utilized during the planning process to interface with stakeholders and the public. A full set of the GIS data was provided to the City of Kingston at the end of the project to use in management of future improvement projects in the City.

Stakeholder and public feedback were also paramount to the development of priorities. This feedback was used to adjust priorities and ensure that the final plan provides guidance that is responsive to needs expressed by the community (public input described in [ADA Transition Plan](#) section).

Ultimately, all violations and needed improvements were given a priority of high, medium, or low, based on the above criteria. The following table illustrates the level of compliance, relative priority, and overall cost estimate for needed improvements for the sidewalks evaluated in Kingston's public ROW.

Priority	Number of Curb Ramps	Cost Est. ¹⁰
Compliant	24	\$0
Low	47	\$117,500
Medium	24	\$60,000
High	73	\$182,500
TOTAL	168	\$360,000

TABLE 3, CURB RAMP PRIORITIES FOR IMPROVEMENT

Of the City's 168 curb ramps evaluated in this study, 144 curb ramps, or 86%, were deemed non-compliant due to one or more of the violations described above. For those deemed non-compliant,

¹⁰ Costs are planning level estimates and do not replace need for cost estimating prior to design and construction. Costs include soft costs and contingencies, but do not include any additional ROW acquisition costs.

most (51%) had two or more non-compliant issues. The map below illustrates the location and priority for improvements to curb ramps across the City¹¹.

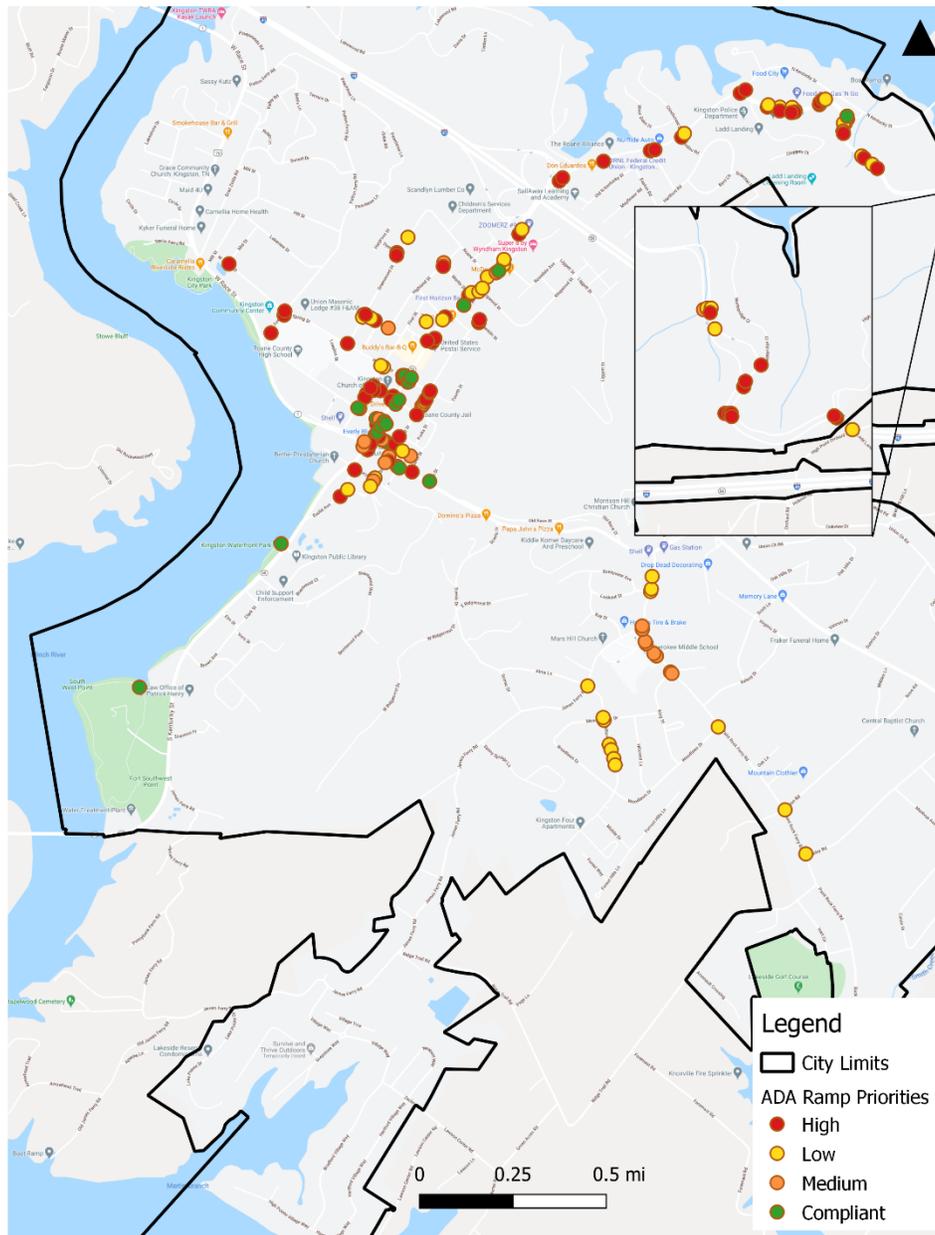


FIGURE 3, CURB RAMP EVALUATION AND PRIORITIZATION

A table containing the full evaluation data is provided in [Appendix E](#).

¹¹ It should be noted that many of the ramps that need to be replaced align with sidewalk segments that need to be replaced. As such, many of the ramp improvements could be addressed as part of the overall sidewalk improvements, lowering the overall cost for bringing the entire PAR up to ADA compliance. For scheduling and prioritization purposes, the ramp priorities and costs are presented separately from the sidewalks.



ADA Transition Plan

The Transition Plan describes how Kingston will transition to full ADA compliance for its programs and services, public facilities, and public right-of-way.

Overview

Public entities such as the City of Kingston, are required to provide access to all City programs, services, and activities for all recipients, including those with disabilities. The objective of this ADA Transition plan is to describe how Kingston will be transitioning to full compliance with the ADA and applicable standards as described throughout this report.

To accomplish this, the Transition Plan is to include the following elements:

- 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)**)
- 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)**)
- 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)**)
- The name of the official responsible for the plan's implementation (**28 CFR 35.150 (d)(3)(iv)**).

In addition, this Transition Plan includes a summary of the recommendations for making policies, services, activities, and programs accessible. The Transition Plan builds upon the findings of the self-evaluations of [Policies and Services](#), [Public Facilities](#), and the [Right-of-Way](#). Those sections provide an overview of the barriers to accessibility discovered in the evaluations of Kingston, while this section provides a plan for implementing improvements.

Specifically, this section of the report will provide:

- Summary of recommendations to improve policies, services, activities, and programs
- List of physical barriers and accessibility improvements needed to address them
- Narrative of public process used to prioritize physical improvements
- Overall priorities generated for removal of physical barriers
- A high-level summary of costs involved in implementing plan Improvements
- Phasing and timeline for completing plan improvements
- Entity responsible for implementation of the plan
- Summary of complaints protocol

City Policies, Services, Activities and Programs Recommendations

The [Self-Evaluation](#) section provides recommendations associated with the findings from a review of the City's policies, services, activities, and programs. Following is a summary of those recommendations:

Findings:

In compliance with the ADA, the City of Kingston has officially adopted by resolution (20-01-14-1) an ADA Notice and ADA Grievance Procedure. These documents are displayed in prominent locations in City Hall and are also posted to their website¹². The City also designated an ADA Coordinator who is responsible for receiving and addressing complaints related to accessibility and will contribute to the ongoing training of staff and prioritization of ADA improvements as part of capital improvements, annual budgets, and updates to policies and programs. The City also has, by official resolution (20-01-14-2), adopted the PROWAG and the ADAAG as guidelines for future alterations and construction of public facilities.

Rooms that were used for public meetings and other regular public programs were documented and the accessibility of programs in those locations were evaluated. One finding of the evaluation of Kingston's programs was that most meeting spaces lack adequate assisted listening system (ALS) or Telecommunication device for the deaf (TDD). It was also found that there were limited opportunities for staff training on accessibility elements, and little to no signage indicating the location of ADA accessible services. No previous complaints regarding ADA accessibility to Kingston's programs and activities were noted by City employees.

Recommendations:

It is recommended that the City continue to carry out and uphold a number of its current policies regarding ADA accessibility, including the designation of the ADA Coordinator position with all of its responsibilities, the placement of an ADA Notice and Grievance Procedure in prominent public locations and the City's website, and the use of the adopted PROWAG and ADAAG to guide all future improvements.

In addition to maintaining these policies, the City should incorporate additional training opportunities for City's ADA Coordinator and staff, including those on the changing ADA requirements, etiquette among those with disabilities, types of activities and programs to accommodate those with disabilities, how to run accessible meetings and activities, and training

¹² <https://kingstontn.gov/policiesprocedures/>

on the installation and use of communication aids and services. A checklist for accessible meetings should be developed and maintained within the City's various departments to guide them in establishing, advertising, and running accessible meetings and other activities.

The City should also develop an accessible signage strategy that provides a timeline and commitment of funds and other resources to bring signage at all of its public facilities to full compliance (See [Appendix D](#)).

Finally, the ADA Coordinator should work with City Officials to implement the ADA Checklist for Emergency Evacuation Procedures¹³. These emergency evacuation procedures should be shared with all departments to ensure that each department is prepared with the necessary procedures for the protection of individuals with disabilities during an emergency evacuation event.

Greater detail about these findings and recommendations can be found under the [Self-Evaluation – City Policies, Services, Activities and Programs](#) section above.



¹³ www.ada.gov/pcatoolkit/chap7emergencymgmtadd1.htm

Specific Physical Barriers and Accessibility Improvements

Specific information on barriers and architectural improvements to make programs and facilities accessible are listed in reports in [Appendix D](#) and [Appendix E](#). These reports include information on buildings and related properties owned, operated, or leased by Kingston as well as pedestrian facilities owned and maintained in the City of Kingston public ROW. Each facility in these reports contains a list of barriers, deficiencies, or other items that do not meet ADA standards and, where applicable, provides recommended corrective actions.

In all, 15 City facilities were inventoried during the self-evaluation process. All of these facilities contained non-compliant issues. Physical remediations are suggested for each of these issues and associated costs for remediation actions were estimated (See [Self-Evaluation – Public Facilities](#) section for details). A total of 10.8 miles of sidewalks were also inventoried and evaluated during the self-evaluation process. Of these sidewalks, 7.1 miles (or 66%) of the sidewalks were found to have ADA compliance issues. The City's curb ramps were also evaluated as part of this plan. A total of 168 curb ramps were inventoried and evaluated during this process, and 144 (86%) contained some level of non-compliant issues. The non-compliant issues discovered for both sidewalks and curb ramps were reported and costs for remediation were estimated (See [Self-Evaluation – Pedestrian Facilities within the Right-Of-Way](#) section for details).

Under the ADA, it is required that local jurisdictions provide priorities and phasing for accessibility improvements. The City of Kingston is limited in its financial ability to make all facilities compliant immediately. Priorities and phasing provide the City with a framework for deciding the order in which to implement. The [Priorities for Barrier Removal](#) and [Transition Plan Phasing](#) sections provide this information.



Public Process

Under the ADA, public involvement is required to provide people outside of the agency, people with disabilities, and other interested parties the opportunity to participate in the development of the plan. A public process was carried out by the City of Harriman and included the formation of an Advisory Committee, an advertised public survey to gain broader public input, interviews conducted with key individuals, and a public review period for the final plan.

The Advisory Committee, formed at the beginning of the plan, included decision makers with the City, service providers, and advocacy organization leadership. The Advisory Committee met several times to review requirements under the ADA, provide input on plan priorities and timelines, and guide further outreach to persons with disabilities. The Cities of Kingston and Rockwood, located nearby in Roane County, share numerous resources and services with Harriman and were working on completing their ADA Transition Plans concurrently. Therefore, a joint Advisory Committee was formed that included membership and representatives from each of these communities. Minutes from these meetings are included in [Appendix B – Public Outreach](#).

The public process for this Transition Plan included:

- Advisory Committee
- Public Survey
- Plan review period

A copy of the input from the Advisory Committee Meetings and public surveys is included in [Appendix B – Public Outreach](#).

Finally, a copy of the draft Transition Plan was made available for review and comment. The plan was placed at the Library and at City Hall for review. A PDF version was also placed on the City's website. A notice of the availability of the plan for review and comment was placed on the website and social media. The final Transition Plan was then submitted to the City Council for adoption.



Priorities for Barrier Removal

Like other Title II entities, the City of Kingston operates under a limited budget and must allocate that budget to address a number of competing needs. To meet recommendations and requirements under the ADA, the City undertook a process to prioritize ADA improvements identified during the self-evaluation of its [public facilities](#) and [public ROW](#). These priorities do not provide guidelines on which improvements should be funded in any one year; that will be determined by the City who will consider the plan amongst other criteria as they set annual budgets and allocate local resources. However, the priorities generated for this plan provide the City with a framework for deciding in what order non-compliant items should be addressed.

In general, physical improvements needed in public facilities and public ROW were divided into the following categories by priority:

High priority improvements

Improvements which were allocated as high priority are those that make travel or use of the facility extremely difficult or even impossible for individuals with disabilities. They are often associated with barriers that present unsafe or hazardous conditions. These improvements also include those that are needed to provide basic access to facilities where public programs and facilities are provided.

Examples of high-priority improvements include:

- Inadequate ADA parking and access routes
- Extreme heaving, displacements, or crumbling pathways that cause unsafe conditions
- Narrow entrances or fixed obstruction blocking pathways
- Extreme slopes or cross slopes on sidewalks or access routes

Medium Priority

Improvements allocated as medium priority may have some impacts on travel of use of public facilities and access to public programs. These items do not present notable safety hazards to most users. These improvements also include those that would ensure the accessibility of programs, services, and restrooms provided within each facility.

Examples of medium-priority improvements include:

- Accessible programs and services within facilities
- Accessible restrooms within facilities
- Sidewalks or access routes which are too narrow for comfortable passing
- Surface conditions that are rough but still passable
- Non-compliant slopes or cross slopes that were not found to present major tipping hazard
- Minor displacements along pathways

Low Priority

Improvements allocated as low priority are those that address issues that are non-compliant but do not present any major barriers for any individual, including those with disabilities, to access public programs and services. These may also consist of areas with non-compliant issues where alternatives are readily available.

Low priority improvements comprise those that do not present any major barriers to accessing programs or services for any individual, including those with disabilities.

Examples of low-priority improvements include:

- Non-compliant water fountains, public phones, light switches, and alarms
- Obstructions that could easily be moved or corrected
- Minor incompatibilities for slope and cross slope along sidewalks
- Other isolated non-compliant issues along sidewalks

Public input also provided a substantive way to prioritize improvements. Initial priorities were set based on the findings from the self-evaluations, as well as discussions with the City Manager. These initial priorities were presented to the Advisory Committee and the public, and their input was used to adjust priorities accordingly (See [Public Process](#) for details).



Overall Priorities Between City Facilities

In addition to generating priorities for improvements needed within each facility, the project team also generated a table to help the City set overall priorities between the City's facilities. These overall priorities were developed considering the level of public use at the facility, the importance of programs and services provided at each facility, and the needs and preferences of the community.

HIGH PRIORITY	MEDIUM PRIORITY	LOW PRIORITY
Kingston City Hall	City Park	Wastewater Treatment Facility
Community Center	Fort Southwest Point	Water & Maintenance Building
Public Library	Gertrude Porter Memorial Park	
Sidewalk Barriers near Public Housing	Ladd Park	
	58 Landing Park and Dog Park	
	Byrd Park	
	Gravel Pit Park	

TABLE 4, KINGSTON OVERALL FACILITY PRIORITIES

The estimated cost for various improvements is summarized in the following section and provided in detail in [Appendix D](#) and [Appendix E](#).

Summary of Transition Plan Costs

In total, the City of Kingston is responsible for an estimated \$2,577,400 in improvements to address non-compliant issues in the City's public buildings, parks, and sidewalks within the public ROW.

Table 5 provides a summary of the estimated overall cost of accessibility improvements in the City of Kingston by priority. The table breaks down costs by public buildings, parks, sidewalks, and curb ramps. These cost estimates are based on information available at the time this plan was generated. It is quite likely that the actual costs could vary from these estimates to account for items not included, such as surveys, property acquisition costs, contracting costs, or any necessary code changes, etc. Finally, it should also be noted that these costs are all for physical alterations and do not account for costs associated with policy changes or staff training.

Greater detail on each element is provided in the reports in [Appendix D](#) and [Appendix E](#).

	Buildings	Parks	Sidewalks	Curb Ramps	Cost Est. ¹⁴
Low Priority	\$ 0	\$ 300	\$189,100	\$117,500	\$306,900
Medium Priority	\$ 30,000	\$ 65,000	\$401,100	\$60,000	\$556,100
High Priority	\$ 11,625	\$ 154,150	\$855,800	\$182,500	\$1,204,075
TOTAL	\$41,625	\$ 219,450	\$1,446,000	\$360,000	\$2,067,075

TABLE 5, CITY OF KINGSTON OPINION OF TOTAL PROBABLE COST

¹⁴ Costs are planning level estimates and do not replace need for cost estimating prior to design and construction. Costs include soft costs and contingencies, but do not include any ROW acquisition costs that may be needed.

Transition Plan Phasing

In order to discuss phasing of ADA improvements, a time frame had to be identified to determine an average annual budget to consider. For the purposes of this report, a **30-year time frame** was utilized. If the City of Kingston were to base its annual improvement schedule on this 30-year time frame, it would require the City to allocate about \$69,000 to ADA improvements on an annual basis (in constant 2019 dollars). Kingston's annual general fund budget for FY19 was \$6.14 Million.

This plan provides guidelines in terms of priority and need for ADA improvements. To decide which projects should receive funding and implementation in any one year, the City should address the most urgent needs to access City programs and services by using firsthand experience, a balance of capital budget needs, and the results of this plan.

ADA Improvements Committee

To ensure the recommendations in this plan are incorporated into capital and agency decision-making, it is recommended that the City form an ad-hoc ADA improvements committee to develop and maintain an ongoing capital strategy, and meet with the legislative body to ensure the capital strategy is incorporated into the City's decision making process. In addition to the capital strategy, the committee should also identify low cost and easily accessed solutions, such as the programs and services that can be moved or altered without architectural alterations. The committee should work with the administration and departments to prioritize these lower cost and procedural changes. Program access is the key element, and improvements at lesser used facilities may be changed to a higher priority if programs and services are provided at that facility.

The committee should be chaired by the ADA Coordinator and should contain department heads and leaders of organizations that provide services in the community.

Plan Updates

This plan is meant to be a living document and, as such, should be updated as projects are completed, and priorities shift with greater utilization of some facilities rather than others over time. Changes to Kingston's policies and programs should also be drafted, implemented, and documented in updates. It is also recommended that the ADA Coordinator keeps a log of training received by staff on ADA standards and guidelines. Finally, the ADA Coordinator should keep a record of all complaints received, and those complaints should be incorporated by revising the priorities of various facilities in future updates.

Responsible Entity

The City of Kingston has many moving parts and will therefore require the cooperation and commitments from decision makers and staff across departments and levels for successful ADA compliance. The ADA requires all public entities with 50 or more employees to designate at least one employee to coordinate efforts towards ADA compliance ([28 CFR 35.107 \(a\)](#)). Federal regulations also require these public entities to make available the name, office address and telephone number of the City's ADA Coordinator to interested persons.

The City of Kingston designated the Public Works Administrative Assistant as the ADA Coordinator effective in late 2019.

Mrs. Marsha Marshall, ADA Coordinator

900 Waterford Place

Kingston, TN 37763

(865) 376-6584

Email: Marsha.Marshall@kingstontn.gov

Contact information for the ADA coordinator is also maintained on the City's website¹⁵. The name and contact information is also included in the City's ADA Notice and Grievance Procedure, copies of which is provided in [Appendix F](#).

Grievance/Complaints Protocol

As an entity with 50 or more employees, the City of Kingston is also required to adopt and publish a grievance procedure which provides for the prompt and equitable resolution of complaints alleging regarding actions prohibited under the ADA ([28 CFR 35.107 \(b\)](#)).

The City of Kingston adheres to the ADA requirements with a grievance procedure as adopted by resolution (20-01-14-1). The procedure provides for resolution of grievances and lists the individuals to contact, process, and timeline for grievances to be addressed. As indicated on the procedure, grievances can be submitted by alternative means as necessary to accommodate a disability.

A copy of the City of Kingston ADA Grievance Procedure is provided in [Appendix F](#).

¹⁵ <https://kingstontn.gov/policiesprocedures/>

Appendix A – Resolutions



RESOLUTION # 20-01-14-1

**A RESOLUTION ADOPTING THE AMERICANS WITH DISABILITIES ACT (ADA)
ADA COORDINATOR AND PROCEDURES**

WHEREAS, the Federal government enacted the Americans with Disabilities Act of 1990 (ADA) to prevent discrimination of the physically and mentally disabled relating to employment and access to public facilities; and

WHEREAS, in compliance with Title II of the ADA, the City of Kingston shall name an ADA coordinator; and

WHEREAS, in compliance with Title II of the ADA, the City of Kingston shall adopt a grievance procedure for resolving complaints alleging violation of Title II of the ADA; and

WHEREAS, in compliance with Title II of the ADA, the City of Kingston shall publish notice to the public regarding the ADA; and

WHEREAS, in compliance with Title II of the ADA, the City of Kingston shall post the ADA coordinator's name, office address, and telephone number along with the ADA Notice and ADA grievance procedure on its website;

NOW THEREFORE, BE IT RESOLVED by the City Council of the City of Kingston as follows:

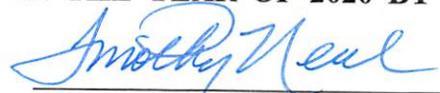
The City Clerk is designated as the ADA Coordinator for the City of Kingston,

The Notice under the Americans with Disabilities Act, a copy of which is attached hereto, is adopted as the City of Kingston notice under the Americans with Disabilities Act.

The City of Kingston Grievance Procedure under the Americans with Disabilities Act, a copy of which is attached hereto, is adopted as the grievance procedure for addressing complaints alleging discrimination on the basis of disability in the provision of services, activities, programs or benefits by the City of Kingston.

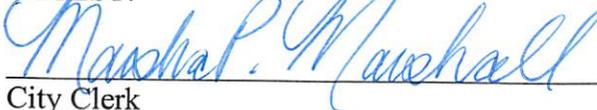
In compliance with Federal and State laws as set forth above, the City Council resolves to post the required information regarding the ADA coordinator, Notice under the Americans with Disabilities Act, and City of Kingston Grievance Procedure under the Americans with Disabilities Act on its website and at such other locations as may be determined from time to time.

**RESOLVED THIS THE 14TH DAY OF JANUARY IN THE YEAR OF 2020 BY THE
CITY COUNCIL OF THE CITY OF KINGSTON**



Mayor Tim Neal

ATTEST:



City Clerk

RESOLUTION #20-01-14-2

A RESOLUTION ADOPTING ADA STANDARDS FOR ACCESSIBILITY AND PUBLIC RIGHTS-OF-WAY ACCESSIBILITY GUIDELINES

WHEREAS, the Federal government enacted the Americans with Disabilities Act of 1990 (ADA) to prevent discrimination of the physically and mentally disabled relating to employment and access to public facilities; and

WHEREAS, ADA standards issued by the Department of Justice (DOJ) and the Department of Transportation (DOT) mandate that all new construction and major alterations follow the Americans with Disabilities Act Accessibility Guidelines (ADAAG); and

WHEREAS, the federal government recommends that recipients of financial assistance from the Federal Highway Administration (FHWA) follow the Public Rights-of-Way Accessibility Guidelines (PROWAG) in order to ensure that pedestrian access to sidewalks and streets, including crosswalks, curb ramps, street furnishings, pedestrian signals, parking, and other components of public rights-of-way are in compliance with ADA requirements; and

WHEREAS, the City of Kingston utilized guidelines set forth in the ADAAG and PROWAG to evaluate facilities and rights-of-way as part of its ADA self-evaluation; and

WHEREAS, the City of Kingston desires to formally adopt ADAAG and PROWAG guidelines as part of the City's continuing effort to ensure that the City of Kingston is in full and continued compliance with the ADA,

NOW THEREFORE, BE IT RESOLVED by the City Council of the City of Kingston as follows:

The City of Kingston now fully adopts the 2010 ADA Standards for Accessibility Guidelines (ADAAG) and the 2011 Public Rights-of-Way Accessibility Guidelines (PROWAG).

RESOLVED THIS THE 14TH DAY OF JANUARY IN THE YEAR OF 2020 BY THE CITY COUNCIL OF THE CITY OF KINGSTON



Mayor Tim Neal

ATTEST:



City Clerk

Appendix B – Public Outreach



Harriman, Kingston and Rockwood ADA Transition Planning

Advisory Committee Meeting #1

Meeting Minutes

August 12, 2019

Present: Steve Bandy, Janet Wilmauth, Janice Coker, Laura Conner, Kenny Humphrey, Michael Marks, Becky Ruppe, Connie Guinn, Chase Clem, Bryan Hill

Next meeting: October, TBD

I. Introductions

Roundtable of introductions among those present and their agencies/affiliation.

II. Overview of ADA Requirements

Bryan Hill provided overview of requirements under ADA law, a quick review of pertinent guidance, and the overall goal for the project, which was stated as:

“Ensure that the cities involved create accessible public programs, facilities and accessible paths of travel in the public right-of-way for people with disabilities”

The need for a role of the ADA coordinators for each City was also discussed. Several participants requested a follow up email with a summary of available ADA training materials for the cities’ designated coordinators.

III. Status of Self-Evaluations and Transition Plans

Bryan Hill provided overview of process and status. Facility and right-of-way (ROW) review largely complete in Rockwood and Kingston and being completed in Harriman. Evaluation of services, programs and activities is underway.

IV. Public Process

Overview of the public process was provided, including discussion of at least two anticipated advisory committee meetings and at least one public meeting. The reasons for public outreach and the types of input sought through the public process was also discussed.

V. Prioritization Criteria

The group had an open discussion around the criteria to consider in prioritizing accessibility improvements. Bryan Hill presented a series of criteria that are often considered during such a prioritization process. The participants were asked to consider these criteria and provide any others. After all criteria had been written down on a large pad, participants were provided three stickers and asked to place those stickers by the criteria they felt were most important in the prioritization of accessibility improvements. This input will be used as a starting point as the project team sorts through the review of facilities and ROW and begins generating a priority list.

VI. Potential Funding Sources

A discussion was led on the known potential sources of funding for improvements.

VII. Adjourn

Harriman, Kingston and Rockwood ADA Transition Planning

Advisory Committee Meeting #2

Meeting Minutes

January 28, 2020

Present: Suzanne Hunsaker, Kenny Humphrey, Connie Guinn, Becky Ruppe, Mike Fuller, Frances Gan, Mikey Marks, Laura Conner, Bryan Hill, Dylan Cooper

Next meeting: Public Meetings, February/March 2020

Meeting began with roundtable of introductions among those present and their agencies/affiliation.

I. Overview of ADA Requirements

Bryan Hill provided overview of ADA law and what it means for local governments and service providers. He also provided an overview of the ADA transition planning process, including the evaluation of public buildings, sidewalks, and policies and programs, and the development of the ADA Transition Plan itself to document findings, cost estimates, priorities, and implementation.

II. Facility and Sidewalk Evaluation

The elements that would be included in the plans were briefly reviewed, including sidewalks, curb ramps, public buildings under the jurisdiction of the communities, and the policies and programs carried out by the communities.

III. Policies and Program Evaluation

An overview was provided for the policies and program elements that were being reviewed in the plans. Participants were reminded about the survey they had received, and it was explained how their responses were going to be used to generate recommendations for policy and program improvements.

IV. Opinion of Probable Costs

Bryan Hill provided overview of evaluations and opinion of probable cost estimates for needed ADA improvements to public buildings and sidewalks. The assumptions made in developing these estimates was discussed, including the fact that these were conservative, high-level estimates for the most expensive “worst case scenario” for improvements. Project phasing was also discussed.

V. Prioritizing ADA Improvements

Bryan briefly reviewed the importance of and benefits to prioritizing improvements. The role of the plan in guiding the annual capital budgeting process was also discussed. Criteria to consider when prioritizing ADA improvements were discussed and participants were asked to “vote” for their preference among the criteria by placing adhesive dots next to the criteria they thought was most important. The group was then introduced to a list of the types of facilities that would be improved and were asked similarly to help prioritize these facilities with adhesive dots.

Through these exercises, the Advisory Committee expressed a desire to prioritize ADA access to public building entrances, major public goods and services, and addressing accessibility violations on sidewalks near public housing and services. Among the public facilities to be improved, the group did not indicate a strong preference for

improvements to one type of facility over any others, but did give a slight preference to prioritizing ADA improvements to City Hall and other government buildings.

VI. Completing the Plan

The final steps for completing the Transition Plans were presented, including:

- Completion and review of department surveys
- Public meetings
- Plan writing/documentation
- Draft plan review (on website)
- Completion of final plans

Several committee members expressed a desire to hold separate public meetings in the three communities to maximize participation and avoid barriers that some from the public may face due to inadequate transportation. It was decided that one public meeting would be advertised and held in each of the communities during the months of February and March.

Although the plans do not need to be officially adopted by the communities in order to be valid, several members of the committee expressed a desire to adopt the plans by resolution, and Bryan responded that he would provide resolution language for their adoption after the plans were complete.

VII. Plan Implementation

Implementation of the finalized and adopted Transition Plans were discussed, including the development of an ongoing ad-hoc ADA Advisory Committee to advise the communities on policies and programs and to ensure the ADA Transition Plan priorities are adequately considered during the annual capital budgeting process.

Participants asked about guidelines and specification for carrying out improvements. Bryan described the role of Federal guidelines and specifications during the implementation of the plan and followed up with links to the [ADA Accessibility Guidelines \(ADAAG\)](#) and the [Public Right-of-Way Accessibility Guidelines \(PROWAG\)](#) which were adopted by each community as official guidelines during the planning process.

VIII. Adjourn

Harriman, Kingston and Rockwood ADA Transition Planning

Advisory Committee Meeting #3

Meeting Minutes

April 7, 2020

Present: Marsha Marshall, Laura Conner, James Kirkland, Becky Ruppe, Bryan Hill, Dylan Cooper

Next meeting: Public Surveys

Meeting began with roundtable of introductions among those present and their agencies/affiliation.

I. Introductions

Brief roundtable of introductions for those present

II. Existing Conditions Questionnaire

Participants were provided with two brief questionnaires, asking them to rate the quality and condition of sidewalks and public facilities in their community. Most reported their buildings and sidewalks as being in fair condition. Curb ramps that were either in poor condition or missing, access to public restrooms, and access to entrances were the most commonly reported challenges.

III. Recap of Evaluation Findings and Probable Costs

A brief review of the miles of sidewalk, number of buildings, and number of parks evaluated in each community was provided. Rough cost estimates for each was also discussed.

IV. Policies and Programs Recommendations

Bryan Hill presented the overall findings and recommendations from the review of policies, programs and activities provided by the communities. Design standards, website content, ADA Coordinators, and meeting room findings were all reviewed. A lack of assisted living devices and appropriate signage were two common themes discovered during the evaluation of programs and policies. Recommendations included continuing current procedures for ADA developed during this process, increasing ADA training opportunities for staff, and adopting checklists for meeting accessibility.

V. Opinion of Probable Costs

Bryan Hill provided overview of evaluations and opinion of probable cost estimates for needed ADA improvements to public buildings and sidewalks. The assumptions made in developing these estimates was discussed, including the fact that these were conservative, high-level estimates for the most expensive "worst case scenario" for improvements. Project phasing was also discussed.

VI. Priorities Questionnaire

Participants were provided with a brief questionnaire, asking them which areas or facilities they thought should receive priority for ADA improvements. It was suggested that the future surveys allow participants to rate the different priorities rather than just select all they thought were important. Participants rated access to schools, City Hall, and high injury areas as most important.

VII. Completing the Plan

Bryan Hill led a brief discussion on remaining steps to complete the plans. Harriman and Kingston still have a few more facilities to review, but it is anticipated these plans will be completed by the end of the fiscal year, as long as public health conditions allow. A draft plan for Rockwood should be completed next week, and will be provided for the City Administrator and ADA Coordinator to review before going out for review by the Advisory Committee and general public.

VIII. Plan Implementation

Implementation of the finalized and adopted Transition Plans were discussed, including the development of an ongoing ad-hoc ADA Advisory Committee to advise the communities on policies and programs and to ensure the ADA Transition Plan priorities are adequately considered during the annual capital budgeting process.

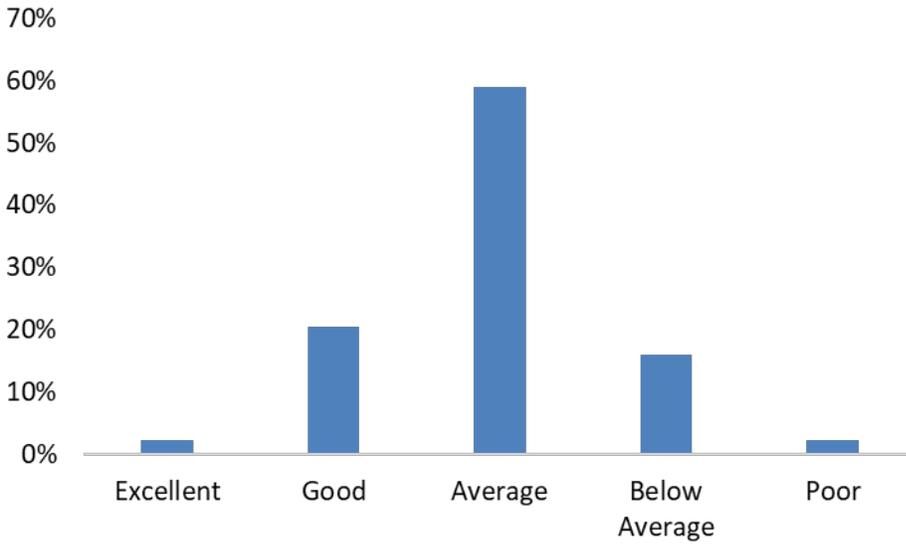
A participant asked how to follow through with plan updates as items were implemented. In addition to the full set of evaluations and priorities provided in the appendix to the plans, CDP will provide the evaluation data in spreadsheet format so the communities can edit, add, and update the plan priorities accordingly. The meeting closed with a discussion of future ADA requirements for grant applications.

IX. Adjourn

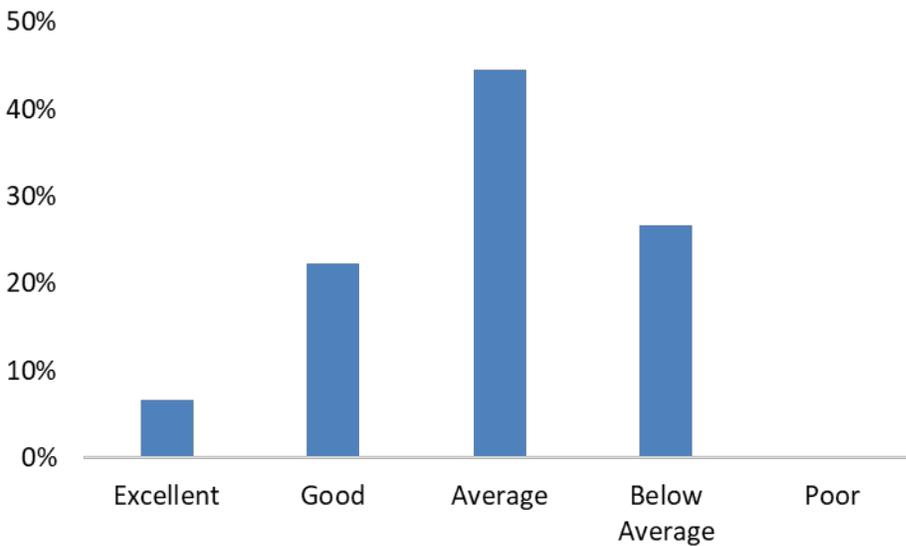
Kingston, TN
ADA Self Evaluation and Transition Plan

Following are tabulated responses to the public surveys distributed and collected during the development of Kingston's ADA Transition Plan.

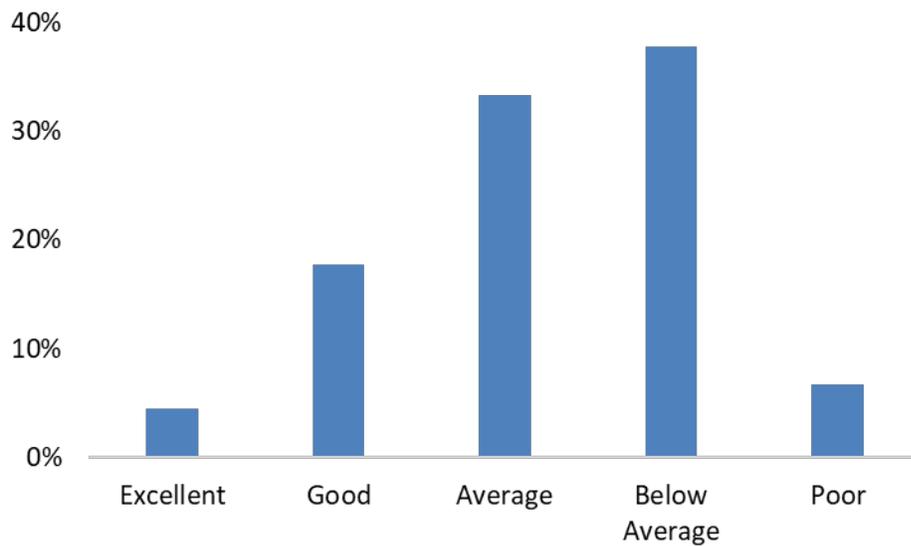
Overall, how would you rate the current level of accessibility in the City of Kingston?



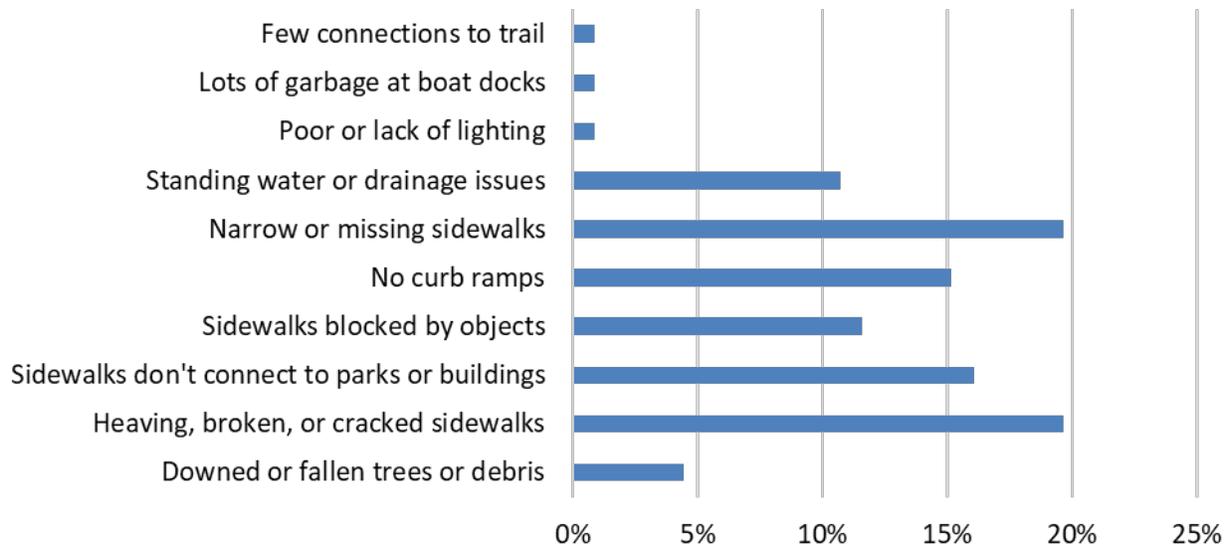
How would you rate the accessibility of public buildings in Kingston?



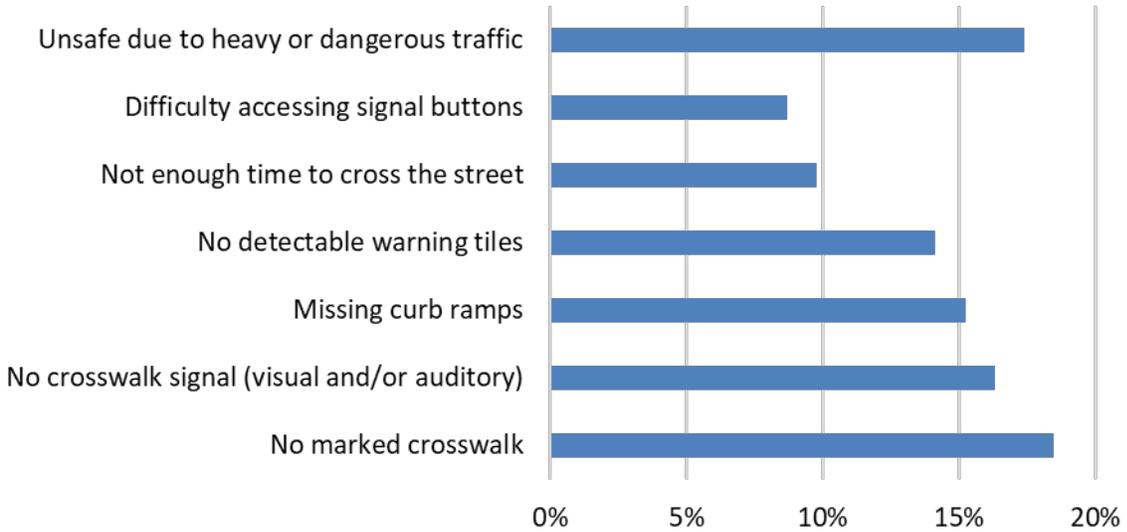
Overall, how would you rate the accessibility of sidewalks in Kingston?



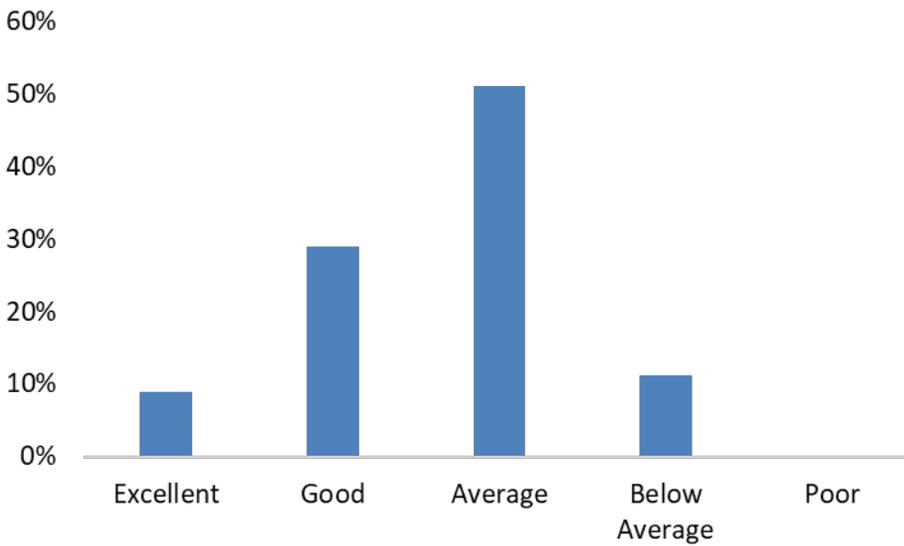
Which of the following barriers have you experienced while walking in Kingston?



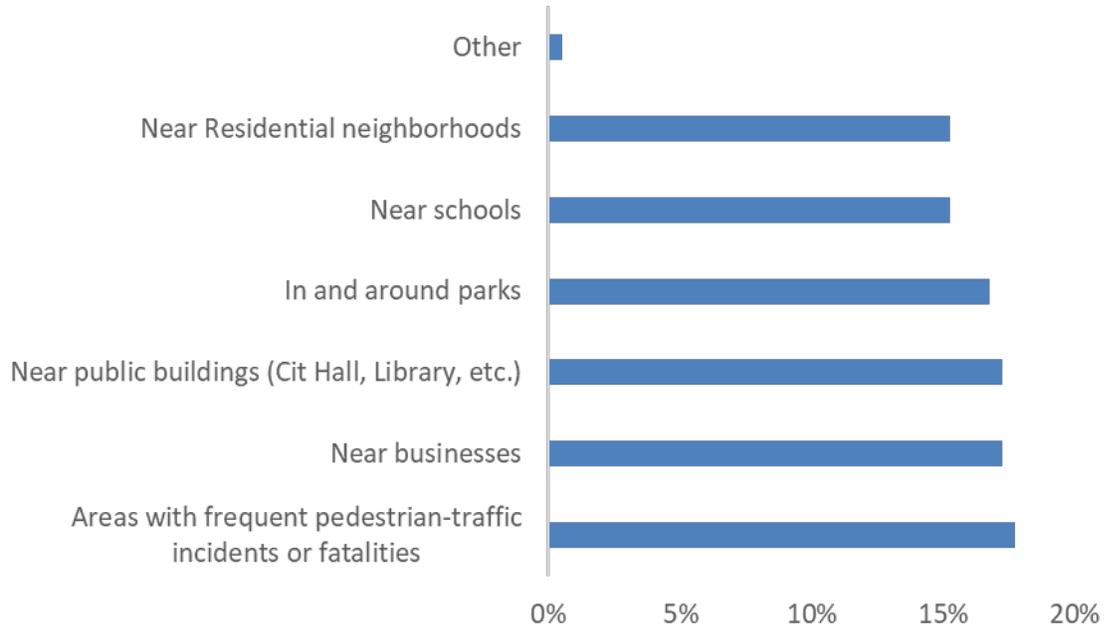
Which of the following barriers have you encountered when navigating intersections in Kingston?



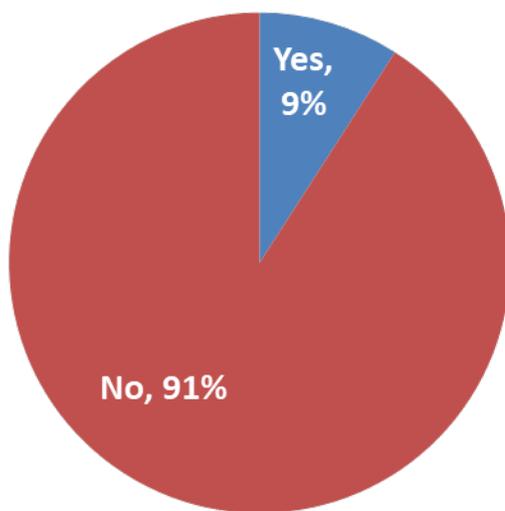
From your experience visiting Kingston city parks, how would you rate their accessibility?



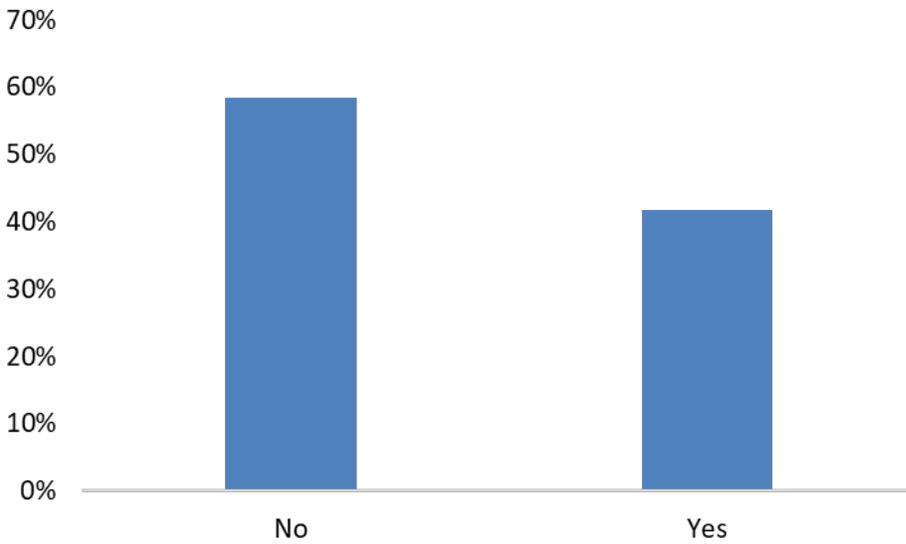
Help us prioritize where improvements should be made first based on location or proximity to destinations or services.



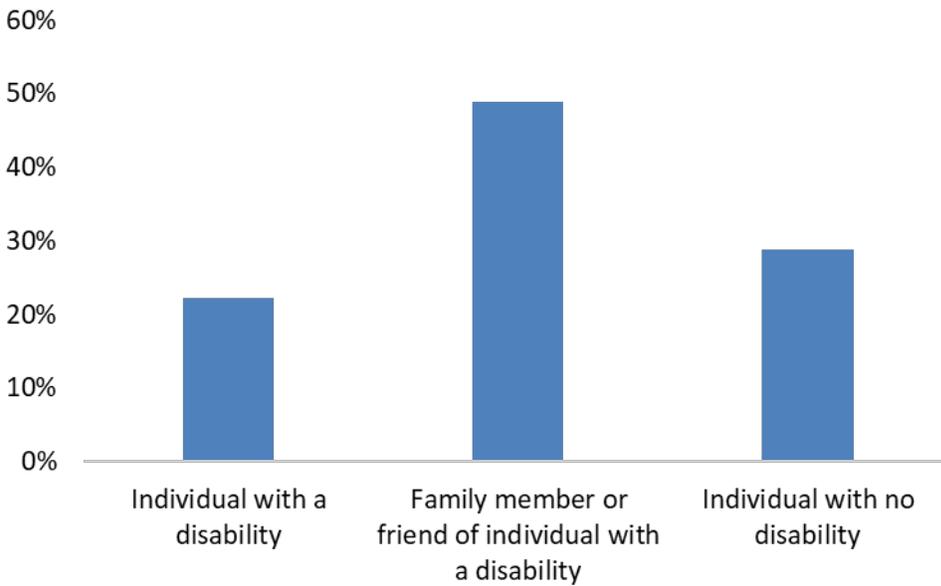
Have you ever requested an accommodation for a disability from the City?



If you answered “Yes” to question 9, was your accommodation provided?

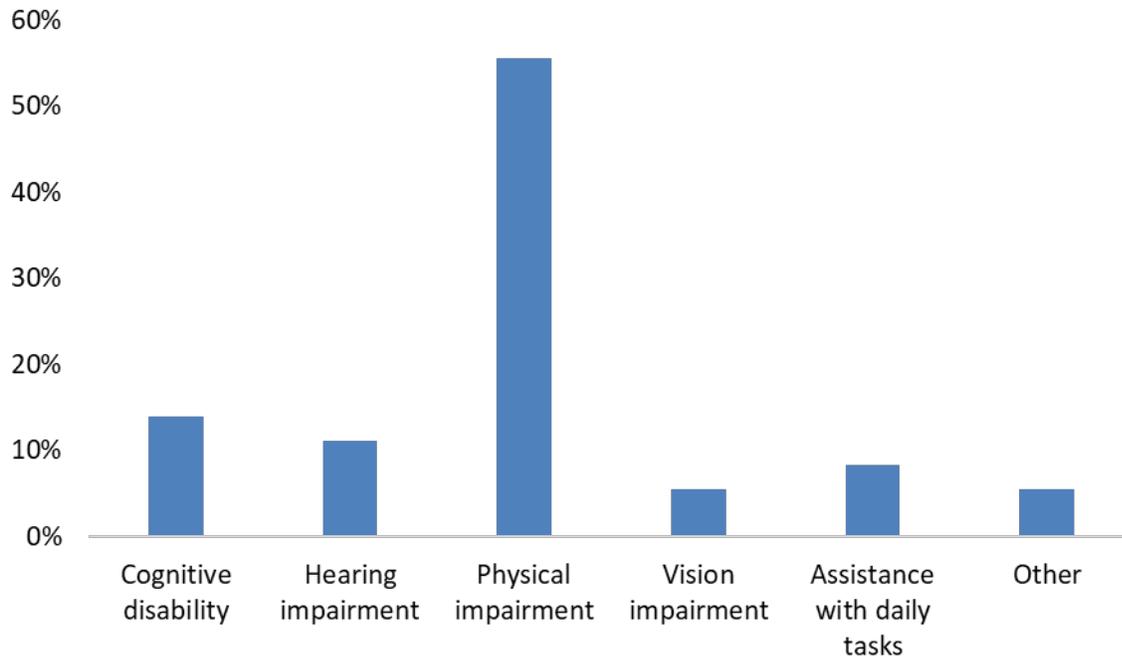


Which of the following best describes you?



Kingston, TN
ADA Self Evaluation and Transition Plan

If you identify as someone with a disability, select all that apply



Appendix C – City Questionnaires

Americans with Disabilities Act Self-Evaluation Programs, Services, and Activities Questionnaire

Kingston, Tennessee

The ADA prohibits the denial of services or benefits to persons with disabilities. In the performance of common, every day services provided by local units of government, you must ensure that all services are available in some way to persons with disabilities. To better allow us to understand each department's interactions with the public, we request that you complete this questionnaire. Your responses are vital to ensuring that modifications can be made throughout the City to ensure access to all programs and services, if necessary. Please discuss with your staff as needed to provide thorough, complete, and accurate responses to each question. The information provided is intended to allow for changes throughout the City to provide equal access to programs and activities to everyone, without exception.

1. Provide a list of City Departments, and address of each. Please provide copies of any payments, publications, applications, forms, etc. that are used for each (electronic preferred).

City Hall – Administration, Business Offices, and Kingston Police Dept. - 900 Waterford Place

Library – 1004 Bradford Way

Parks & Rec – 201 Patton Ferry Rd

Southwest Point Fort – 1226 S Kentucky St

Street Dept – 1503 ½ James Ferry Rd

Water Distribution 1504 James Ferry Rd

Waste Water Treatment – 1503 James Ferry Rd

Fire Dept – 125 W Cumberland St

Water Plant – 1318 S Kentucky St

2. Please list all appointed boards and commissions and when and where they meet.

City Council, Beer Board, Water Board, Monthly Work Session- 1st Tuesday – City Hall Conference Room

City Council, Beer Board, Water Board, Monthly - 2nd Tuesday – City Hall- Council Chambers

Planning Commission – Monthly – 3rd Tuesday - City Hall- Council Chambers

Parks & Rec Board, Beautification Committee, Outdoor Kingston – 1st Monday Monthly– Community Center- Room A

Library Board – Monthly 2nd Thursday – Library

BZA – Meets as needed- City Hall- Conference Room or Council Chambers

Americans with Disabilities Act Self-Evaluation
Programs, Services, and Activities Questionnaire

3. Please provide a list of all locations and room(s) where public meetings are held.

City Hall – Conference Room and Council Room

Community Center – Meeting Rooms

Library- General Area

4. Do all meeting rooms that hold public meetings have an audio system (microphones and speakers)? Do they have any assistive listening devices for the hearing impaired? If so, how many and what type?

Council Room – Yes, No assistive listening devices

Community Center – No Audio or Listening Devices

Library - No Audio or Listening Devices

5. Are meetings televised or provided in audio format? Are meetings recorded and rebroadcast? If so, what accommodations have been made for hearing impaired?

Meetings are recorded by BBB Communications and then rebroadcast. Meetings are posted on the U Tube channel.

6. Is there a poster for “Equal Opportunity is the Law” that describes the requirements of Title VII of the Civil Rights Act located in all City buildings? If so, would you please indicate where they are located?

City Hall – Main Hallway

Fire Dept – 2nd Floor

Community Center – Breakroom

Library – Catalog Office & Outside

Water Plant - Hallway

Water Distribution - Breakroom

Waste Water Treatment – Hallway

Street Dept – Shop Bulletin Board

7. How are public meetings publicized? Are agendas posted in City Hall and on the web site? Do the agendas have an ADA statement of accommodation on them? Provide a typical copy of a recent agenda for a public meeting.

Publicized by - Newspapers, Website, Facebook

Agendas – City Hall, Website, and Facebook

Agenda’s attached

8. Please provide CDP with a copy (electronic preferred) of the City’s Personnel Policy Manual(s), job descriptions, and Application(s) for Employment.

Attached

Americans with Disabilities Act Self-Evaluation
Programs, Services, and Activities Questionnaire

9. Are you aware of any formal training of non-police and police personnel related to ADA specifically? If so, note who has taken training and the date, location, and provider of the training.

No

10. Are you aware of any instances where City staff has interacted with persons with disabilities and altered their normal procedures to accommodate them in some way? Please describe and be specific.

Water Department Office Personnel helps to write checks for customers, will go out to customers cars for payments or signatures, uses intercoms or goes outside the office for hearing impaired customers.

11. Has the City been requested to provide accommodation to any City employee with a disability (temporary or permanent) to allow them to perform their essential job functions? If so, please describe

No

12. Do you allow any community groups, etc. to use City facilities for meetings, picnics, etc.? If so, provide a copy of any lease agreements.

No Agreements for City Hall or Community Center; Library has an application that is **attached**

13. Please list any special events that the City sponsors or participates in some way (parades, carnivals, flea markets, etc.). Please indicate location of events, duration, etc. and any documentation of events you have.

Christmas Parade – Approximately 2 hours – Streets of Kingston

Street Festivals – Court Street – All day

4th of July Festival – City Park and Gravel Pit area – All day

Hardship Hill – Southwest Point Fort Area – All day

Storm the Fort - Southwest Point Fort Area – All day

Christmas Bazaar – Community Center – All day

Ideas Fair – Community Center – All day

Triathlon - City Park, 58 Landing & Fort Area – All day

Food Drive – City Park – All day

Americans with Disabilities Act Self-Evaluation
Programs, Services, and Activities Questionnaire

14. Are emergency procedures in place at City facilities for evacuation in the event of an emergency? Are emergency assembly or shelter areas identified for each building? Please identify.

City Hall exits the closest available Exit and meets outside in the parking lot by driveway.

Library exits the closet available Exit and meets outside in the parking lot

Community Center exits the closet available Exit and meets outside in the parking lot Spring Street

Fire Dept. exits the closet available Exit and meets outside in the Church parking lot

Street Dept. exits the closet available Exit and meets outside at the salt shed

Waste Water Treatment exits the closet available Exit and meets at digester/pump room

Water Plant exits the closet available Exit and meets outside front parking lot

15. Please provide a copy of the City's and/or County's Emergency Management Plan.

16. Has the City ever been asked to provide special accommodation to the public for printed materials? If so what was requested and provided?

No

17. Do any City facilities have Telecommunication Devices for the Deaf (TDD) or access to a relay service to communicate to persons with hearing loss?

No

18. Who is the website developer for the City? How often is it updated? Who is the contact person to discuss the website with (name and phone number/e-mail)?

2:45 Tech, as needed, Scott Spaid, 865-465-4040 x700, scott.spaid@245tech.com

In house updates made by Kelly Jackson – 865-376-6584, x 1102, Kelly.jackson@kingstontn.gov

19. Who at the City is the Human Resources person that would be responsible for ADA Title I (employment)? Please provide name and contact information.

Emilye Guge – Humans Resources – Emilye.guge@kingstontn.gov, 865-376-6584, ext 1101 and
Department Heads

Americans with Disabilities Act Self-Evaluation
Programs, Services, and Activities Questionnaire

20. Does the City own all the buildings that provide services to the public? Does the City lease or use space from other owners to provide services/programs to the public?

City owns and has No leases

21. Are there any specific suggestions or thoughts anyone at the City has regarding how programs could be made more accessible to persons with disabilities? Training you think would be especially helpful for anyone at the City?

None at this time.

Appendix D – Building and Park Facilities Physical Barrier Summaries

Facility	Item	Priority	Deficiency	Notes	Correction	Price Factor	Cost / Each	Count	Cost
58 Landing Park	Parking Lot	1	Grades	Reconstruct parking to bring ADA parking spaces to grade. May require associated ramps.	Pavement	High	\$ 15,000	2	\$ 30,000
58 Landing Park	Restroom	3	Bathroom	Remodel bathroom to achieve 60" width, lavatory position, signage, door clearance.	Restroom Remodel	Medium	\$ 3,000	2	\$ 6,000
58 Landing Park	Accessible Route	1	Grades	Boarding Pier: 22% grade. Solution most likely require survey and design work for proper estimate.	Pavement	High	\$ 15,000	2	\$ 30,000
58 Landing Park	Accessible Route	1	Grades	Boat Slips: 11% grade. Needs clear turning space. Solution may require survey and design work.	Pavement	High	\$ 15,000	1	\$ 15,000
Byrd Park	Parking Lot	1	ADA Parking Spaces	Stripe and sign to accommodate sufficient ADA parking spaces	Striping	Medium	\$ 750	1	\$ 750
Byrd Park	Accessible Route	1	Grades	Modify accessible route so that grades crossing grate are compliant.	Pavement	Low	\$ 3,750	1	\$ 3,750
Byrd Park	Restroom	3	Bathroom	Remodel bathroom to achieve 60" width, lavatory position, signage, door clearance.	Restroom Remodel	Medium	\$ 3,000	2	\$ 6,000
Byrd Park	Restroom	3	Ramp	Construct compliant ramp for restroom entry. Consider handrails and level landing space.	Ramp: Construct / Modify	Low	\$ 1,500	1	\$ 1,500
Byrd Park	Restroom	3	Restroom Door	Replace existing door with accessible door and hardware.	Door Replacement	Medium	\$ 1,000	2	\$ 2,000
City Park	Parking Lot	1	Grades	Reconstruct parking to bring ADA parking spaces to grade.	Pavement	Medium	\$ 7,500	1	\$ 7,500
City Park	Restroom	3	Restroom Sink	Relocate sink and wrap pipes.	Relocate / Reconfigure	Medium	\$ 200	2	\$ 400
City Park	Restroom	3	Restroom Door	Replace existing door with accessible door and hardware.	Door Replacement	Medium	\$ 1,000	2	\$ 2,000
City Park	Restroom	3	Restroom Signage	Install appropriate signage	Signage: Add / Replace	Low	\$ 100	2	\$ 200
City Park	Restroom	3	Mirror	Relocate mirror	Relocate / Reconfigure	Low	\$ 100	2	\$ 200
City Park	Restroom	3	Grab Bar	Relocate toilets or build out walls for proper spacing and installation of grab bars and other required hardware.	Interior Construction	Low	\$ 3,000	2	\$ 6,000
City Park	Controls	4	Controls	Replace fire alarm with unit that has both flashing lights and audible signals.	Hardware	Low	\$ 150	2	\$ 300
City Park	Accessible Route	1	Signs	Construct ADA compliant slip at boarding pier RT of boat launch. Install signs indicating route to accessible slip.	Interior Construction	Low	\$ 3,000	1	\$ 3,000
Community Center	Parking Lot	1	Grades	Construct edge protection.	Interior Construction	Medium	\$ 7,500	1	\$ 7,500
Community Center	Interior Route	2	Signs	Reconstruct parking to bring ADA parking spaces to grade.	Pavement	Low	\$ 100	12	\$ 1,200
Community Center	Interior Doors	2	Door Handles	Replaces signs with ADA approved signs for accessibility.	Signage: Add / Replace	Low	\$ 150	6	\$ 900
Community Center	Restroom	3	Bathroom	Replace door handles (all)	Hardware	Low	\$ 150	6	\$ 900
Fort Southwest Point	Parking Lot	1	ADA Parking Spaces	Remodel bathroom to achieve 60" width, signage, door clearance, new lavatory/counter, ramps	Restroom Remodel	Medium	\$ 3,000	4	\$ 12,000
Fort Southwest Point	Counter	2	Counter Heights	Reconstruct for compliant grades for 2 accessible spaces with appropriate dimensions & signage.	Pavement	Medium	\$ 7,500	3	\$ 22,500
Fort Southwest Point	Restroom	3	Bathroom	Reconstruct counter to meet specifications	Interior Construction	Low	\$ 3,000	1	\$ 3,000
Fort Southwest Point	Restroom	3	Bathroom	Remodel bathroom to achieve 60" width, signage, door clearance, rework lavatory, grab bars, etc	Restroom Remodel	Low	\$ 1,500	1	\$ 1,500
Gertrude Porter Memorial Park	Restroom	3	Bathroom	Relocate lavatory	Relocate / Reconfigure	Medium	\$ 200	2	\$ 400
Gertrude Porter Memorial Park	Restroom	3	Bathroom	Modify threshold	Relocate / Reconfigure	Medium	\$ 200	2	\$ 400
Gertrude Porter Memorial Park	Restroom	3	Bathroom	Replace/modify door closer	Relocate / Reconfigure	Medium	\$ 200	2	\$ 400
Gravel Pit Park	Parking Lot	1	ADA Parking Spaces	Striping and Signing for proper number of accessible spaces of appropriate width	Hardware	Low	\$ 150	2	\$ 300
Gravel Pit Park	Parking Lot	1	Curb Ramp	Reconstruct curb ramp	Striping	Medium	\$ 750	1	\$ 750
Gravel Pit Park	Restroom	3	Bathroom	Cover lavatory pipes, reconfigure door for clear space and swing, modify wall for grab bars and distance.	Ramp: Construct / Modify	Medium	\$ 3,000	1	\$ 3,000
Gravel Pit Park	Restroom	3	Bathroom	Reconstruct curb ramp	Restroom Remodel	Low	\$ 1,500	4	\$ 6,000

Facility	Item	Priority	Deficiency	Notes	Correction	Price Factor	Cost / Each	Count	Cost
Gravel Pit Park	Restroom	3	Signs	Install/replace signs	Signage: Add / Replace	Low	\$ 100	4	\$ 400
Gravel Pit Park	Entry Route	1	Grades	Modify accessible route so that grades are compliant at Boarding Pier and Fishing Pier	Pavement	High	\$ 15,000	2	\$ 30,000
Ladd Park	Parking Lot	1	ADA Parking Spaces	Designate ADA accessible parking spaces with proper width, number, signs and symbols	Striping	High	\$ 1,500	1	\$ 1,500
Ladd Park	Restroom	3	Signs	Install appropriate signage at Greenway restrooms	Signage: Add / Replace	Low	\$ 100	2	\$ 200
Ladd Park	Restroom	3	Bathroom	Park restrooms need remodel for appropriate dimensions, door handles/hardware, etc.	Restroom Remodel	Medium	\$ 3,000	2	\$ 6,000
Public Library	Accessible Route	1	Curb Ramp	Reconstruct slopes of ramp flares	Ramp: Construct / Modify	Low	\$ 1,500	1	\$ 1,500
Public Library	Counter	2	Counter	Reconstruct counter with proper extension width	Interior Construction	Low	\$ 3,000	1	\$ 3,000
Public Library	Entrance	2	Door Handles	Replace door handles (all)	Hardware	Low	\$ 150	1	\$ 150
Public Library	Restroom	3	Door	Reconfigure door for clear space	Door Replacement	Low	\$ 500	1	\$ 500
Wastewater Treatment Facility	Parking Lot	1	ADA Parking Spaces	Configure parking for accessible parking spots and signage	Striping	Medium	\$ 750	1	\$ 750
Wastewater Treatment Facility	Interior Route	2	Door Handles	Replace door handles (all)	Hardware	Low	\$ 150	2	\$ 300
Wastewater Treatment Facility	Interior Route	2	Clear Space	Reconfigure doors and clear hallways to provide clear space	Relocate / Reconfigure	High	\$ 400	4	\$ 1,600
Wastewater Treatment Facility	Restroom	3	Bathroom	Remodel bathroom to achieve 60" width, signage, door clearance, new lavatory/counter, ramps	Restroom Remodel	Medium	\$ 3,000	2	\$ 6,000
Water & Maintenance Building	Parking Lot	1	ADA Parking Spaces	Provide striping and signage for proper width and location of accessible parking spaces	Striping	Medium	\$ 750	1	\$ 750
Water & Maintenance Building	Entrance	2	Door Handles	Replace door handles (all)	Hardware	Low	\$ 150	2	\$ 300
City Hall	Parking Lot	1	ADA Parking Spaces	Reconfigure by repainting lines to make access aisle at least 8' wide for van accessible spaces	Striping	Low	\$ 375	2	\$ 750
City Hall	Entrance	1	Signs	Add sign to side entrance indicating location of ADA Entrance	Signage: Add / Replace	Low	\$ 375	1	\$ 375
City Hall	Restroom	3	Signs	Downstairs Restrooms, raise sign with braille to a height of at least 48" (60" max)	Signage: Move	Low	\$ -	2	\$ -
City Hall	Restroom	3	Bathroom	Raise toilet in downstairs ADA stalls to 17" - 19"	Relocate / Reconfigure	Medium	\$ 200	2	\$ 400
City Hall	Restroom	3	Bathroom	Raise toiletpaper holders in downstairs ADA stalls to at least 15"	Relocate / Reconfigure	Low	\$ 100	2	\$ 200
City Hall	Restroom	3	Bathroom	Replace Grab bars in downstairs Men's ADA stall with compliant lengths per ADA guidelines (42" min side and 36" min rear)	Hardware	Low	\$ 150	2	\$ 300
City Hall	Restroom	3	Bathroom	Move paper towel dispensers in downstairs restrooms to height of 44"	Relocate / Reconfigure	Low	\$ 100	2	\$ 200
City Hall	Restroom	3	Bathroom	Current flush buttons for toilets in downstairs restrooms difficult to depress. Replace with more easily used flush controls or automated flush controls	Hardware	Medium	\$ 375	2	\$ 750
City Hall	Meeting Room	2	Signs	Install signs with braille outside Council Chamber Room and City Manager's Office (48" height)	Signage: Add / Replace	Low	\$ 100	2	\$ 200
City Hall	Meeting Room	2	Seating	Add one more ADA seating/wheelchair location in public seating area of Council Chamber Room	Relocate / Reconfigure	Low	\$ 100	1	\$ 100
City Hall	Meeting Room	2	Access Route	Add ramp on at least one side of council seating area in Council Chamber Room	Ramp: Construct / Modify	Low	\$ 1,500	1	\$ 1,500
City Hall	Restroom	3	Signs	Replace signage at upstairs restrooms with signage including braille at 48 - 60" height	Signage: Add / Replace	Low	\$ 100	2	\$ 200
City Hall	Restroom	3	Bathroom	Move paper towel dispensers in downstairs restrooms to height of 44"	Relocate / Reconfigure	Low	\$ 100	2	\$ 200
Fort Paws Dog Park	Parking Lot	1	ADA Parking Spaces	Regrade and reconfigure ADA parking spaces to include access aisle for each space in accordance with standards	Surface: Regrade / Modify	High	\$ 3,000	2	\$ 6,000

Facility	Item	Priority	Deficiency	Notes	Correction	Price Factor	Cost / Each	Count	Cost
Fort Paws Dog Park	Parking Lot	1	ADA Signage	Add designated ADA signage, including Van Accessible Signage where appropriate	Signage: Add / Replace	Medium	\$ 200	2	\$ 400
Fort Paws Dog Park	Walkways	2	Walkways	Replace sidewalks throughout to address slopes and cross slopes that often exceed 7% - 9%	Sidewalk	Medium	\$ 8	1	\$ 22,500

Appendix E – Public Right-Of-Way Facilities Summary

Streets	Length	Cross Slope	No Ramp	Obstruction	Unsafe	Discontinuity	Width	Surface Cond	Priority	Segment	Side
1st St	279		Y					Y	Medium	W Cumberland St to W Race St	E
Court St	308	Y						Y	Medium	N Kentucky St to N 3rd St	N
E Cumberland St	164		Y					Y	High	W Cumberland St at First St	E
E Cumberland St	298	Y		Y					High	N 3rd St to Fourth St	S
E Race St	69						Y	Y	Medium	S 3rd St to Midblock	N
E Race St	249						Y		Medium	Alley to Fourth St	N
E Race St	285						Y		Medium	Fourth St to 5th St	N
Fisher St	374				Y			Y	Medium	Greenwood St to Highland St	N
Fort Southwest Point	3992	Y							High	Fort Southwest Point	
Fort Southwest Point	141	Y							Low	B Brown Memorial Tr	
Fort Southwest Point	246	Y							Low	B Brown Memorial Trail	
Fort Southwest Point	377	Y							Low	Tonachio Trail	
Franklin St	308	Y						Y	Medium	N Kentucky St to N 3rd St	E
Greenwood St	190				Y			Y	High	Hope Cir to Midblock	W
Greenwood St	948	Y			Y			Y	Medium	Dyer St to Hope Cir	W
Greenwood St	95	Y			Y				Medium	Dyer St to Midblock	W
Highland St	315			Y				Y	High	Spencer St to Midblock	N
Highland St	689							Y	Medium	Fisher St to Spencer St	N
Ladd Landing Blvd	1246	Y							High	N Kentucky St to Food City	N
Ladd Landing Blvd	75	Y							Low	Ladd Landing Way	E
Ladd Landing Blvd	92	Y							Low	Armour Rd at N Kentucky St	S
Ladd Landing Blvd	115	Y							Low	Ladd Landing Way	W
Ladd Landing Blvd	259	Y							Low	Ladd Landing Way	W
Ladd Landing Blvd	141		Y					Y	Medium	Bridge at Ladd Landing Way	N
Ladd Landing Blvd	112	Y							Medium	Fleet St at Ladd Landing Way	S
Loveless St	335	Y		Y					High	First St to N Kentucky St	N
Martin St	544	Y	Y	Y				Y	High	Highland St to N Kentucky St	W
N 3rd St	171	Y			Y			Y	High	E Race St to Alley	E
N 3rd St	581	Y		Y					High	Franklin St to Sennett St	E
N 3rd St	298	Y							Medium	Sennett St to Midblock	E
N Kentucky St	335	Y			Y			Y	High	Roane St to Martin St	W
N Kentucky St	207	Y	Y					Y	High	Franklin St to Alley	E
N Kentucky St	148		Y					Y	High	Fleet St at N Kentucky St	S
N Kentucky St	308	Y		Y					High	E Spring St to Loveliss St	E
N Kentucky St	541	Y							High	Kingswood St to Midblock	E
N Kentucky St	541	Y							High	Harvey Ave to Kingswood St	E
N Kentucky St	692	Y							High	Brandau Rd to Midblock	S
N Kentucky St	200	Y							High	Midblock to Loveliss St	W

Streets	Length	Cross Slope	No Ramp	Obstruction	Unsafe	Discontinuity	Width	Surface Cond	Priority	Segment	Side
N Kentucky St	341 Y								High	Lovell St to E Cumberland St	E
N Kentucky St	938 Y				Y			Y	Medium	Spencer St to W Spring St	E
N Kentucky St	89 Y							Y	Medium	W Spring St to Midblock	W
N Kentucky St	968 Y							Y	Medium	Spencer St to W Spring St	W
N Kentucky St	341 Y								Medium	Manchester Rd to Brandau Rd	S
N Kentucky St	443 Y								Medium	Martin St to Spenser St	W
No Name	144 Y								Low	N Kentucky St to Alley	S
No Name	177 Y								Low	E Race St to Midblock	E
Northbridge Close	102 Y								Low	Ladd Landing Way	E
Paint Rock Ferry Road	305 Y						Y	Y	High	Farmington Trail to King St	W
Paint Rock Ferry Road	492						Y		High	James Ferry Rd to Farmington Trail	W
Paint Rock Ferry Road	712 Y								Low	Oak Ln to Rose Rd	E
Paint Rock Ferry Road	774 Y								Low	Woodlawn Dr to Oak Ln	E
Paint Rock Ferry Road	377 Y			Y			Y	Y	Medium	Kelsay Dr to Woodlawn Dr	W
Paint Rock Ferry Road	646			Y		Y			Medium	King St to Kelsay Dr	W
Paint Rock Ferry Road	686 Y			Y					Medium	Rose Rd to Bailey Rd	E
Paint Rock Ferry Road	515 Y								Medium	Lookout St to James Ferry Rd	W
Paint Rock Ferry Road	210 Y								Medium	Midblock St to Lookout St	W
Path	581 Y		Y					Y	High	B Brown Memorial Trail	
Path	335		Y					Y	Low	B Brown Memorial Trail	
S 3rd St	95 Y		Y				Y		High	Midblock to E Race St	E
S 3rd St	157			Y					High	E Race St to Alley	W
S 3rd St	292 Y							Y	Medium	E Church St to E Race St	W
S Kentucky Ave	784 Y		Y					Y	High	Dogwood St to Easton Rd	S
S Kentucky Ave	239 Y								High	I-40 to Midblock	E
S Kentucky St	1620 Y						Y	Y	High	B Brown Memorial Trail	
S Kentucky St	397 Y					Y		Y	High	S Kentucky St	N
S Kentucky St	312 Y		Y					Y	High	E Church St to E Race St	E
S Kentucky St	321 Y							Y	High	E Race St to W Cumberland St	W
S Kentucky St	203 Y								Low	B Brown Memorial Trail	W
W Cumberland St	1010 Y							Y	High	Patton Ferry Rd to Alley	N
W Race St	833 Y		Y				Y	Y	High	B Brown Memorial Trail	N
W Race St	180 Y		Y					Y	High	B Brown Memorial Trail at Race St	S
W Race St	1250 Y						Y		High	B Brown Memorial Trail	N
W Race St	295 Y								High	Kentucky St to S 3rd St	S
W Race St	295 Y								Low	Kentucky St to S 3rd St	N
W Spring St	325		Y	Y			Y	Y	High	N Kentucky St to N 3rd St	S
W Spring St	856 Y			Y				Y	High	Patton Ferry Rd to Greenwood St	S

Streets	Length	Cross Slope	No Ramp	Obstruction	Unsafe	Discontinuity	Width	Surface Cond	Priority	Segment	Side
W Spring St	348			Y		Y			High	First St to N Kentucky St	S
W Spring St	535	Y		Y					High	Midblock to Patton Ferry Rd	N
W Spring St	115	Y							Medium	Mid St to Midblock	N
Willowbrook	567	Y				Y			Low	James Ferry Rd to Meadowview Dr	W
Willowbrook	266	Y							Low	Meadowview Dr to Midblock	W
Willowbrook	384	Y	Y	Y				Y	Medium	Woodlawn Dr to Mibile Dr	W
E Cumberland St	194							Y	Medium	Midblock to S 3rd St	S

Appendix F – Forms and Notices

City of Kingston Grievance Procedure Under The Americans with Disabilities Act

This Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 (ADA). It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the City of Kingston, Tennessee. The City of Kingston Personnel Policy governs employment-related complaints of disability discrimination.

The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of complainant and location, date, and description of the problem. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint, will be made available for persons with disabilities upon request.

The complaint should be submitted by the grievant or designee as soon as possible but no later than sixty (60) calendar days after the alleged violation to:

**Marsha Marshall
City of Kingston
900 Waterford Place
Kingston, TN 37763
(865) 376-6584**

Marsha.Marshall@kingstontn.gov

Within fifteen (15) calendar days after receipt of the complaint, the ADA Coordinator or designee will meet with or otherwise contact the complainant to discuss the complaint and possible resolutions. Within fifteen (15) calendar days of the meeting, the ADA Coordinator or his/her designee will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of the City of Kingston and offer options for substantive resolution of the complaint.

If the response by the ADA Coordinator or his/her designee does not satisfactorily resolve the issue, the complainant and/or his/her designee may appeal the decision within fifteen (15) calendar days after receipt of the response to the Mayor of the City of Kingston or designee.

Within fifteen (15) days after receipt of the appeal, the Mayor or designee will meet with or otherwise contact the complainant to discuss the complaint and possible resolutions. Within fifteen (15) days after the meeting, the Mayor or designee will respond in writing, and where appropriate, in a format accessible to the complainant, with a final resolution of the complaint.

All complaints received by the ADA Coordinator or designee, appeals to the Mayor of the City of Kingston, or designee, and responses from these two offices will be retained by the City of Kingston for at least three (3) years.

Notice under the Americans with Disabilities Act

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990, ("ADA"), the City of Kingston does not discriminate on the basis of disability in its services, programs, or activities.

Employment: The City of Kingston does not discriminate on the basis of disability in its hiring or employment practices and complies with the ADA title I employment regulations.

Effective Communication: The City of Kingston will generally, upon request, provide auxiliary aids and services leading to effective communication for persons with disabilities so they can participate equally in the City of Savannah's programs, services, and activities, including qualified sign language interpreters, assistive listening devices, documents in Braille, and other ways of making communications accessible to people who have speech, hearing, or vision impairments.

Modifications to Policies and Procedures: The City of Kingston will make reasonable modifications to policies and procedures to ensure that people with disabilities have an equal opportunity to enjoy programs, services, and activities. For example, people with service animals are welcomed in City of Kingston offices, even where pets and other animals are prohibited.

Requests: Anyone who wishes to request an auxiliary aid or service for effective communication, or a modification of policies or procedures so they can participate equally in the City of Kingston's programs, services, and activities should contact ADA Coordinator Marsha Marshall as soon as possible, preferably 72 hours before the activity or event.

Complaints: Send complaints to ADA Coordinator, Marsha Marshall

The City of Kingston will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy, such as retrieving items from locations that are open to the public but are not accessible to such persons with disabilities.

ADA Coordinator:

**Marsha Marshall
City of Kingston
900 Waterford Place
Kingston, TN 37763
(865) 376-6584**

Marsha.Marshall@kingstontn.gov