

HARRIMAN TENNESSEE

ADA Self-Evaluation & Transition Plan





Harriman, TN

2021

ADA Self-Evaluation & Transition Plan

Contents

Executive Summary	1
Introduction and Overview	3
Self-Evaluation – City Policies, Services, Activities and Programs	6
Introduction	7
Public Notices/Information	7
Grievance/Complaint Procedure	10
Public Meetings	12
Communication Formats	14
Ordinances and Standards	15
Information and Signage	15
Staff Training	16
Employment	17
Emergency Evacuation Procedures	18
Self-Evaluation – Public Facilities	19
Introduction	20
Project Approach	20
Public Facility Inventory	23
Public Facility Findings Summary	25
Self-Evaluation – Pedestrian Facilities within the Right-Of-Way	27
Introduction	28
Project Approach	28
Sidewalk Inventory	31
Sidewalk Findings Summary	34
Curb Ramp Inventory	36
Curb Ramp Findings Summary	40
ADA Transition Plan	42
Overview	43

City Policies, Services, Activities and Programs Recommendations	44
Specific Physical Barriers and Accessibility Improvements	46
Public Process	47
Priorities for Barrier Removal	48
Summary of Transition Plan Costs	51
Transition Plan Phasing	52
Responsible Entity	53
Grievance/Complaints Protocol	53
Appendix A – Resolutions	
Appendix B – Public Outreach	
Appendix C – City Questionnaires	
Appendix D – Building Facilities and Parks Physical Barrier Summaries	
Appendix E – Public Right-Of-Way Facilities Summary	
Appendix F – Forms and Notices	



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 Harriman 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 Harriman 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: | ● Harriman Fire Station 1 | ● Short Street Park |
| ● Harriman Community Center | ● Harriman Fire Station 2 | ● Meadowview Park |
| ● Princess Theater/Visitors Center | ● Harriman Housing Authority | ● Triangle Park |
| ● Golf and Country Club | ● Parks: | ● Papermaker Ballfield |
| ● Harriman Public Library | ● Flour Mill Flats Ballfield | ● Riverfront Park |
| ● Harriman Utility Board | ● Killeffer Park | ● Drack's Track Park |

¹ <https://adata.org/learn-about-ada>



Evaluations of these facilities were completed by Cannon & Cannon, Inc. Engineers and Surveyors (CCI), and Community Development Partners, LLC (CDP). Findings were recorded and evaluated by CDP, in coordination with the City of Harriman. Evaluations of parks and buildings focused on public use 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 14.8 miles of City sidewalks and 154 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 a total of **\$172,850**. An additional **\$2,130,300** was estimated for needed sidewalk improvements, and **\$330,000** was estimated for needed curb ramp improvements. This brings the total probable cost for needed ADA improvements in the City of Harriman to an estimated **\$2,633,150**.

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 from public surveys 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 Harriman 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 Harriman 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 Harriman 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) contains 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 are 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 Coordinator worked with an ADA Advisory Team and involved the participation of all city departments.

A questionnaire was also completed to evaluate compliance of policies, programs, and activities in the City of Harriman. This questionnaire asked City Officials about public meeting locations, compliance for employment within the City of Harriman, 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 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 at Harriman City Hall.
- The City of Harriman adopted Resolutions for ADA guidelines as of January 7th, 2020 (See [Appendix A](#))
- ADA compliance and documents are listed on the City of Harriman's website at <https://www.cityofharriman.net/departments/hr/hr-americans-with-disabilities-act>
- Public meeting locations that are open to the public include Harriman City Hall, Harriman Police Department, Harriman Fire Department, and the Harriman Public Library
- Special called meetings are published in the local newspaper Roane County News, and all meetings are also published on the city's website (cityofharriman.net) using Google Calendar
- Only City Hall was found to have an audio system (microphones and speakers) and none of the public meeting locations had assisted listening devices.
- The City Council meetings are recorded and broadcasted on cable tv channel 12. They are also processed to include closed captioning.
- City Council meetings, Regional Planning Commission meetings, and the Board of Zoning Appeals meetings are broadcasted via Facebook live and are also uploaded to the City of Harriman's YouTube channel and also include closed captioning



- City Council Agendas are posted on the city's website at:
<https://www.cityofharriman.net/departments/CityCouncilMeetingMinutes>
- City council agendas did not include an ADA statement of accommodation
- The City of Harriman will provide, upon request, communication accommodations for persons with disabilities, including the following:
 - Handwritten communication and translation
 - Assistive listening devices
 - Oral language interpreter
 - Braille
 - Sign-language
 - Any other forms of communication for those with visual, hearing, or speech disabilities
- All employees have been required to watch an online video titled "Americans With Disabilities Act (ADA) / Basic Training You Need to Know" for ADA training purposes
- The City of Harriman has provided a copy of the City's Personnel Policy Manual, job descriptions, and Application(s) for Employment
- None of the City facilities have emergency assembly or shelter areas defined but utilize the [Roane County Hazard Mitigation Plan](#).



Public Notices/Information

The City of Harriman has documented its Public Notices and Grievances under the Americans with Disabilities Act of 1990 in accordance with [Title II](#) of the ADA. Harriman 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 Harriman's Notice under the Americans with Disabilities Act is available on their website at:

<https://www.cityofharriman.net/departments/hr/hr-americans-with-disabilities-act>

Harriman 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 at City Hall. The poster describes the requirements of Title VII of the Civil Rights Act. The City of Harriman's public notices for ADA such as the Notice under the Americans with Disabilities Act, as well as the City of Harriman Grievance Procedure Under the Americans with Disabilities Act are also posted at City Hall.

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 Harriman has implemented Grievance and Complaints procedures in order to allow for ample consideration of all complaints and concerns in regard to accessibility².

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.

Ms. Keta Mize, ADA Coordinator

Assistant City Manager

408 N Roane Street,

Harriman, TN 37748

Phone: (865) 882-9414

Email: kmize@cityofharriman.net

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 Harriman City Manager:

Scott Mason

City Manager

408 N Roane Street,

Harriman, TN 37748

Phone: (865) 882-9414

Email: scott.mason@cityofharriman.net

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

² <https://www.cityofharriman.net/departments/hr/hr-americans-with-disabilities-act>



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 Harriman 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 Harriman administration in 2019. Public meeting locations include Harriman City Hall, Harriman Police Department, Harriman Fire Department, and the Harriman Public Library.

The assessment indicated that only City Hall is equipped with an audio system (microphones and speakers) and none of the public meeting locations have assisted listening devices. The City Council meetings are recorded and broadcasted on cable tv channel 12. They are also processed to include closed captioning. City Council meetings, Regional Planning Commission meetings, and the Board of Zoning Appeals meetings are broadcasted via Facebook live and are also uploaded to the City of Harriman’s YouTube channel and also include closed captioning.

Regular meetings are published on the city’s website (cityofharriman.net) using Google Calendar, and special meetings are published in the local newspaper Roane County News. City Council Agendas are posted on the city’s website at:

<https://www.cityofharriman.net/departments/CityCouncilMeetingMinutes>.

None of the agendas reviewed were found to contain an ADA accommodation statement.

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 each room containing equipment.
- 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 Harriman should be able to provide, upon request, accommodations 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 Harriman’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 Keta Mize at kmize@cityofharriman.net or at (865) 882-9414 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 7, 2020, the City of Harriman fully adopted resolutions for ADA guidelines for the 2010 ADA Accessibility Guidelines (ADAAG) and the 2011 Public Right-Of-Way Accessibility Guidelines (PROWAG). These guidelines are outlined and set forth in Resolution: R0120-02 and Resolution: R0120-03 and ensure that the city of Harriman follows ADA guidelines for both new and ongoing projects.

These resolutions were signed by the Mayor and attested by the City Manager. 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 Harriman 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. It was noted in the Questionnaire that all employees were required to watch an online video titled "Americans With Disabilities Act (ADA) / Basic Training You Need To Know" ; the training was implemented using a Google form to record when each employee watched the video. This training was conducted from 11-14-2019 to 12-09-2019.

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.”

Theresa Beard, City Clerk, and Harriman’s designated ADA Title I (Employment) coordinator can be reached by phone: (865) 882-9414, or by email: tbeard@cityofharriman.net

As part of the self-evaluation process, a copy of the City’s Personnel Policy Manual, job descriptions, and Application(s) for Employment was evaluated. The Personnel Policy Manual outlines twelve sections pertaining to aspects of employment and includes an ADA non-discrimination disclosure. Information on employment in the City of Harriman can be found at:

<https://www.cityofharriman.net/departments/hr/jobs>

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 properly 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.

The City of Harriman participates and abides by the [Roane County Hazard Mitigation Plan](#) created by the Roane County Hazard Mitigation Committee and Roane County Emergency Management. According to the citywide Questionnaire, emergency exits are clearly marked for evacuation in the event of an emergency at all facilities. However, none of the facilities have emergency assembly or shelter areas defined.

Recommendations

- City officials should work with the Harriman's emergency services and first responders in order to create feasible citywide emergency evacuation plans and procedures.
- 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 Harriman. The goal of this evaluation was to analyze and prioritize those facilities in need of improvement and/or implementation of ADA compliant improvements.

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 Harriman for ADA accessibility. This part of the evaluation began by identifying the facilities owned by the City of Harriman 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 Harriman³:

- Community Center
- Emory Golf Club
- Fire Station 1
- Fire Station 2
- Flour Mill Flats Ballfield
- Harriman Housing Authority
- Killeffer Ballfield
- Riverfront Park
- Harriman Utility Board
- Princess Theater
- Papermaker Ballfield
- Drack's Track Park
- Short Street Park
- Triangle Park

³ In addition to the above facilities, the City Municipal Building was evaluated for accessibility. As the plan was completed, the City moved out of that building and is in the process of selling the property. As such, the City Municipal Building was not included in the findings and cost estimates. The City is in the process of moving into its new location at 408 N Roane Street, Harriman, TN 37748. Evaluations and corrections to provide accessible elements should be provided at this new location as well.



- Harriman Public Library

- Meadowview Park

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)⁴. 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*⁵ (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 the 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:

⁴ <https://adata.org/project/ada-checklist>, accessed 6/1/2019

⁵ 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 count 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 Harriman in Resolution R0120-02 (See [Appendix A](#)).

Harriman's historic charm is one of the things that makes the community distinctive. As such, many of the buildings and other facilities in Harriman are historic and provide a unique set of accessibility challenges based on the building codes or practices when they were built. According to the ADA, historic buildings are not exempt from ADA requirements to make alterations or accommodations for accessibility. However, when such an alteration would damage the historic significance of the structure, alterations may not be required. In these cases, program access, such as the provision of activities or services in alternative locations is required.



Public Facility Inventory

Utilizing the [Project Approach](#) described above, Harriman'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 Harriman facilities were insufficient or non-compliant ADA parking, and access routes with no curb ramps. Entrances with narrow dimensions and running or cross slopes that were too steep along entrance routes also presented issues. 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 Harriman, the dimensions of aisles and counters and inadequate clear space along interior routes were the most common issues encountered. Non-compliant interior doors and missing or inadequate signage 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.

In Harriman, a number of facilities were found to have restrooms with a large number of non-compliant issues requiring either renovation or construction 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. Missing or inadequate signage was a common deficiency. 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 Harriman, most facilities provided access to these elements. In a few locations, deficient alarm controls and non-compliant water fountains 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. Public 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 Harriman's public facilities.⁶

Priority	Priority Level			Facility Total Cost Est. ⁷
	High	Medium	Low	
Community Center	\$13,800	\$15,300	\$-	\$29,100
Drack's Track	\$16,500	\$4,900	\$-	\$21,400
Emory Golf Club	\$3,000	\$15,700	\$1,125	\$19,825
Fire Station 1	\$750	\$600	\$-	\$1,350
Fire Station 2	\$6,750	\$1,700	\$-	\$8,450
Flour Mill Flats Ballfield	\$2,250	\$6,000	\$-	\$8,250
Housing Authority	\$1,500	\$9,100	\$750	\$11,350
Killeffer Park	\$15,200	\$-	\$-	\$15,200
Meadowview Park	\$3,475	\$-	\$-	\$3,475
Papermaker Ballfield	\$14,250	\$6,550	\$-	\$20,800
Princess Theater	\$1,050	\$2,300	\$-	\$3,350
Public Library	\$4,500	\$16,150	\$450	\$21,100
Riverfront Park	\$750	\$3,000	\$-	\$3,750

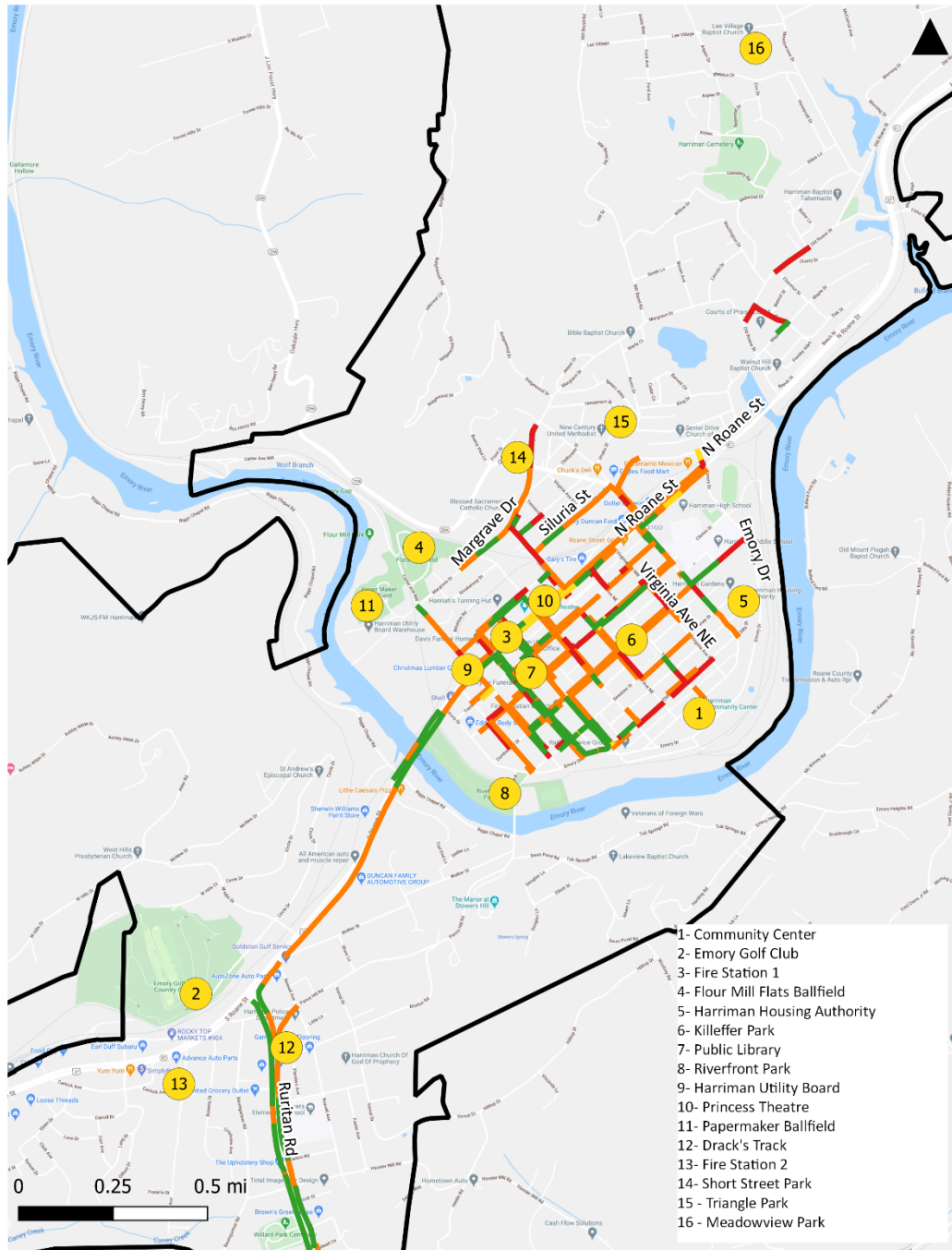
⁶ Please note, these priorities reflect the importance within each facility; a process including both the advisory committee and the public was carried out to develop priorities between the City's public facilities, documentation of which is provided in the [ADA Transition Plan](#) section below.

⁷ Costs are planning level estimates and do not replace the need for cost estimating prior to design and construction. Costs include soft costs and contingencies, but do not include any property acquisition costs.



Short Street Park	\$475	\$-	\$-	\$475
Triangle Park	\$1,975	\$-	\$-	\$1,975
Utility Board	\$3,000	\$-	\$-	\$3,000
TOTAL	\$89,225	\$81,300	\$2,325	\$172,850

Of the City's 16 public facilities evaluated in this study, all of them contained non-compliant elements in at least one of 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.



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 processes 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 multi-use 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 **14.8 miles** of sidewalks.

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 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 Harriman in Resolution R0120-02 (See [Appendix A](#)).



Sidewalk Inventory

Utilizing the [Project Approach](#) described above, current sidewalks within Harriman'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 Harriman. Therefore, a width of 5' was used as the benchmark for compliance. Of the City's 14.8 miles of sidewalks, 2.4 miles (16%) contained sections that were less than 5' in width.

Although the continuous width of most of the City's PARs was deemed adequate, the actual usable width 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 present along some portions of about 5.2 miles of sidewalk – or 35% of the City’s total sidewalks. 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

Poor or inadequate surface conditions were one of the most common challenges and reasons for sidewalk failure in Harriman, with about 6.6 miles (45%) containing poor surface conditions. Some of the common failures in surface conditions include overgrown vegetation, heavy cracking, and unstable surfaces, just to name a few. There were also a number of sidewalk segments in the historic residential area that are still made of cobblestone, causing surfaces to be unstable for some users.



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.

Most of Harriman's sidewalks were found to be clear of obstructions and protrusions, with only two obstructions noted near the corner of Oak St and Maple Street.

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 Harriman, about 1.4 miles, or 9%, of sidewalks contained discontinuities between grades. 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.

During the evaluation, a significant number of sidewalk sections (26%) were observed as ending without curb ramps. This was one of the more common safety issues noted in Harriman. 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 Harriman 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 Harriman's public ROW.

Priority	Length (Mi)	Cost Est. ⁸
Compliant	4.4	\$0
Low	0.6	\$128,900
Medium	7.8	\$1,593,600
High	2.0	\$407,800

TABLE 1. SIDEWALK PRIORITIES FOR IMPROVEMENT

⁸ 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.



TOTAL	14.8	\$2,130,300
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Of the City's 14.8 miles of PAR evaluated in this study, 10.4 miles, or 71%, was deemed non-compliant due to one or more of the violations described above. For those deemed non-compliant, most (51%) had two or more non-compliant issues. The map below illustrates the location and priority for improvements to the PAR across the City.

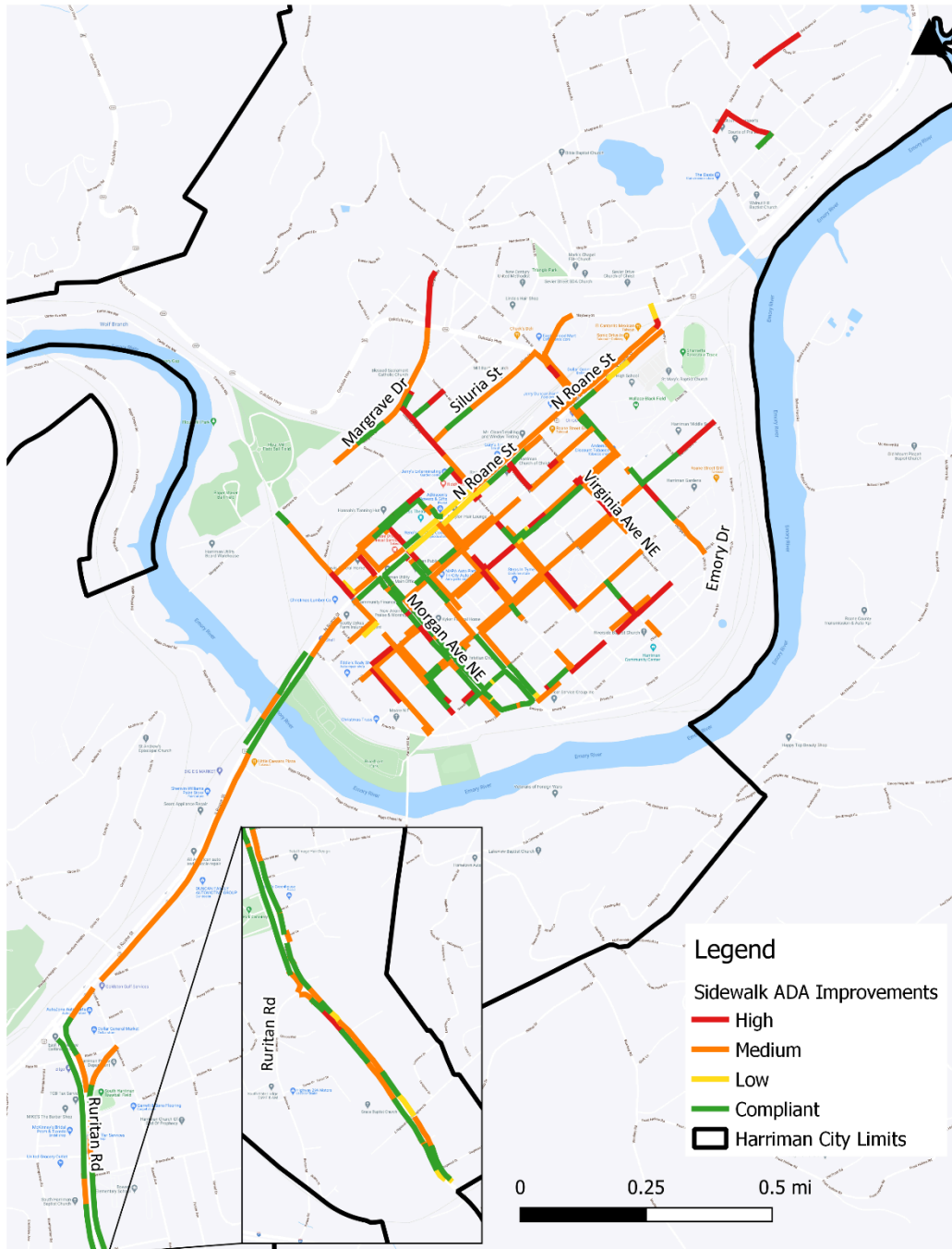


FIGURE 1, SIDEWALK EVALUATION AND PRIORITIZATION

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 Harriman’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 154 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 Harriman’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 Harriman, parallel-type curb ramps comprise most (60%) 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 Harriman, perpendicular type curb ramps comprised 26% 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 Harriman, blended transition curb ramps comprised 14% 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 ^{9,10}
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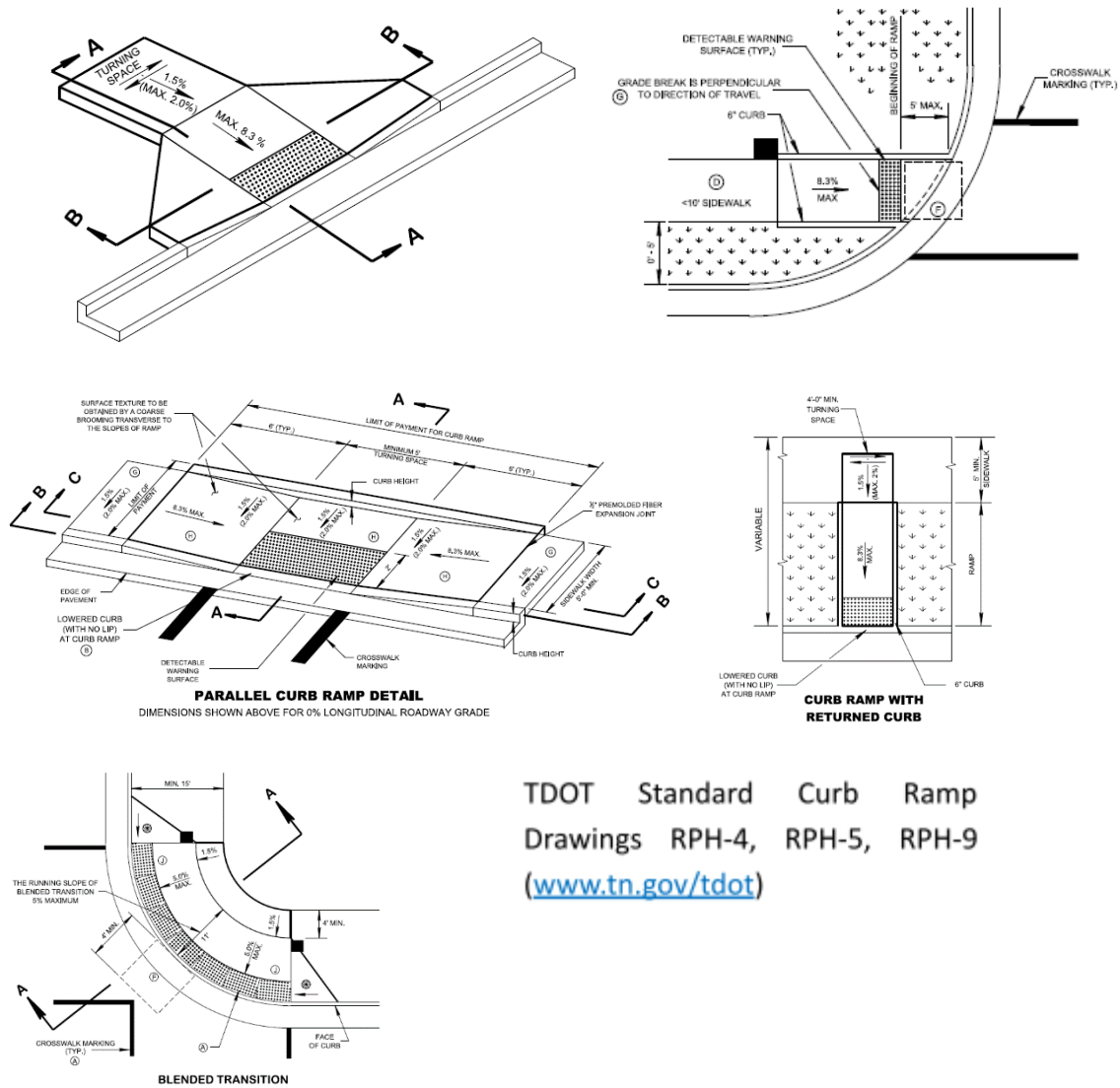
⁹ Please note, in the case of all ramps, design and construction modifications may be required for curb ramps to be installed along a roadway with a running grade of more than 5%.

¹⁰ 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/>



Parallel	92	60%	Type 2, Type 1A
Perpendicular	41	26%	Type 1, Type 4, Type 4A
Blended Transition	15	14%	Blended Transition
TOTAL	111	100%	

TABLE 2, CURB RAMP CATEGORIES AND DESIGN TYPES



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



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.

All of the curb ramps evaluated in Harriman were found to have an adequate width to meet the PROWAG standards described above.

Running Slope

Per [R304.3.2](#) of the PROWAG, the running slopes of all curb ramps 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.

Only 21 (14%) of the curb ramps evaluated in Harriman had a running slope that was either too steep or too shallow. 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.

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 curb ramps evaluated in Harriman (89%) had compliant cross slopes. The majority of 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 ½", and discontinuities between ¼" and ½" should be beveled with a slope of no steeper than 50%.

Over 40% of the curb ramps evaluated in Harriman 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 Harriman, width and conditions of landings and turning spaces were only noted as an issue in two locations: at the intersection of Crescent Ave NE and N. Roane St, and at the intersection of Queen Ave NE and Clinton St.

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 Board¹¹.

During the evaluation, it was found that about a third of all curb ramps lacked the required detectable warning surfaces. The installation of these surfaces should be coordinated with the replacement of ramps throughout the City.

¹¹ <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 Harriman 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 Harriman's public ROW.

Priority	No Curb Ramps	Cost Est. ¹²
Compliant	22	\$0
Low	20	\$50,000
Medium	97	\$242,500
High	15	\$37,500
TOTAL	154	\$330,000

TABLE 3, CURB RAMP PRIORITIES FOR IMPROVEMENT

¹² 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 154 curb ramps evaluated in this study, 132 curb ramps, or 86%, were deemed non-compliant due to one or more of the violations described above. For those deemed non-compliant, most (61%) had two or more non-compliant issues. The map below illustrates the location and priority for improvements to curb ramps across the City.

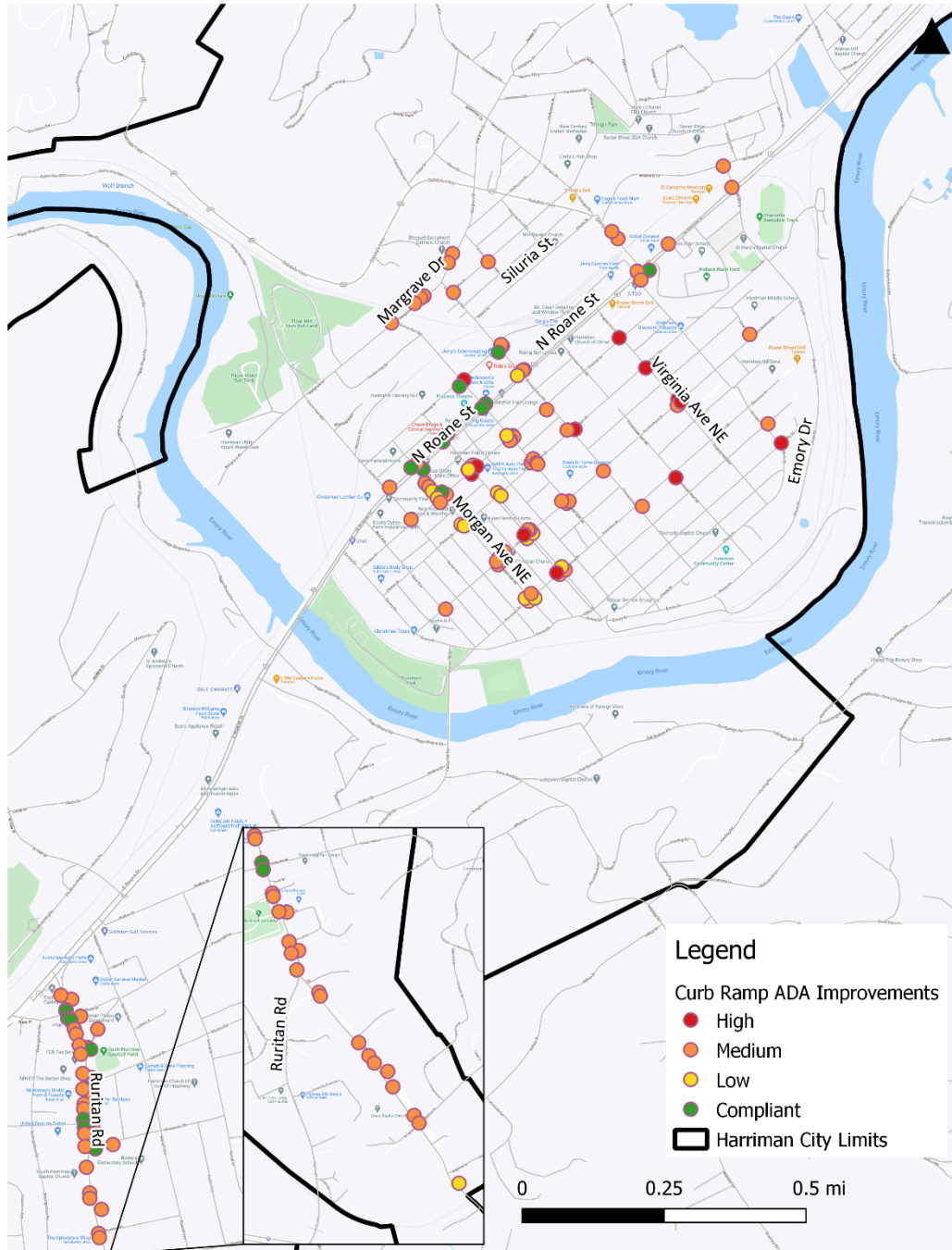


FIGURE 2, CURB RAMP EVALUATION AND PRIORITIZATION



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

ADA Transition Plan



The Transition Plan describes how Harriman 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 Harriman, 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 Harriman 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 will include 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 Harriman, 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 – City Policies, Services, Activities and Programs](#) 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 Harriman has officially adopted by resolution ([R0120-03](#)) an ADA Notice and ADA Grievance Procedure. These documents are displayed in prominent locations in City Hall and are also posted to their website¹³. 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 ([R0120-02](#)), 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 Harriman’s programs was that none of the regular meeting spaces have an adequate assisted listening system (ALS) or Telecommunication device for the deaf (TDD) installed. It was also found that accessible emergency evacuation and staging locations were needed, and many programs had deficient signage indicating the location of ADA accessible services. All employees are required to watch an online video titled “Americans With Disabilities Act (ADA) / Basic Training You Need to Know” for ADA training purposes. No previous complaints regarding ADA accessibility to Harriman’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

¹³ <https://www.cityofharriman.net/departments/hr/hr-americans-with-disabilities-act>



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 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 Procedures¹⁴. 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.



¹⁴ www.ada.gov/pcatoolkit/chap7emergencygmtadd1.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 Harriman as well as pedestrian facilities owned and maintained in the City of Harriman 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, 16 City parks and buildings 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 14.8 miles of sidewalks were also inventoried and evaluated during the self-evaluation process. Of these sidewalks, 10.4 miles (or 70%) 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 154 curb ramps were inventoried and evaluated during this process, and 132 (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 Harriman 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 are 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 Harriman 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 or 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 and ADA Coordinator. 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
Municipal Building	Flour Mill Flats Ballfield	Utility Board
Community Center	Papermaker Ballfield	Fire Station 1
Public Library	Riverfront Park	Fire Station 2
Housing Authority	Killeffer Park	Emory Golf Club
Princess Theater	Triangle Park	Short Street Park
	Drack's Track	Meadowview Park

TABLE 4, HARRIMAN 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 Harriman is responsible for an estimated \$2,633,150 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 Harriman 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. ¹⁵
Low Priority	\$ 2,325	\$ 0	\$128,900	\$50,000	\$181,225
Medium Priority	\$ 60,850	\$ 20,450	\$1,593,600	\$242,500	\$1,917,400
High Priority	\$ 34,350	\$ 54,875	\$407,800	\$37,500	\$534,525
TABLE , CITY OF HARRIMAN OPINION OF TOTAL PROBABLE COST					
TOTAL	\$ 97,525	\$ 75,325	\$2,130,300	\$330,000	\$2,633,150

¹⁵ 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 Harriman were to base its annual improvement schedule on this 30-year time frame, it would require the City to allocate about \$89,000 to ADA improvements on an annual basis (in constant 2019 dollars). Harriman's annual general fund budget for FY19 was \$7.36 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 Harriman'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 Harriman 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 Harriman designated the Administrative Assistant to the City Manager as the ADA Coordinator effective in January 2020. As of the writing of this plan, that position is being reassigned. Until it does, the role of ADA Coordinator will be fulfilled by the City Manager.

Keta Mize, Assistant City Manager, ADA Coordinator

Harriman City Municipal Building

408 N Roane Street

Harriman, TN 37748

Phone: (865) 882-9414

Email: kmize@cityofharriman.net

Contact information for the ADA coordinator is also maintained on the City's website¹⁶. The name and contact information is also included in the City's ADA Notice and Grievance Procedure, copies of which are provided in [Appendix F](#).

Grievance/Complaints Protocol

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

The City of Harriman adheres to the ADA requirements with a grievance procedure as adopted by resolution ([R0120-03](#)). 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 Harriman ADA Grievance Procedure is provided in [Appendix F](#).

¹⁶ <https://cityofharriman.com/american-with-disabilities-act-and-transition-plan-information>



Appendix A – Resolutions





Appendix B – Public Outreach





Appendix C – City Questionnaires





Appendix D – Building and Park Facilities Physical Barrier Summaries





Appendix E – Public Right-Of-Way Facilities Summary





Appendix F – Forms and Notices

