

# ADA TRANSITION PLAN



METROPOLITAN  
COUNCIL

March 2020

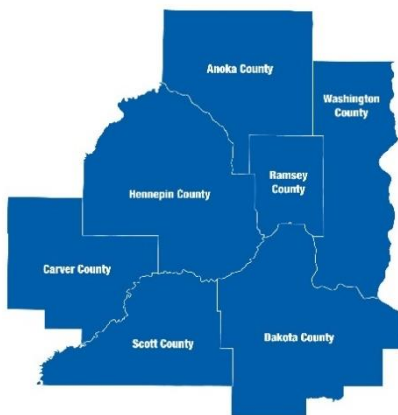
The Metropolitan Council's mission is to foster efficient and economic growth for a prosperous metropolitan region.

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The Metropolitan Council is the regional planning organization for the seven-county Twin Cities area. The Council operates the regional bus and rail system, collects and treats wastewater, coordinates regional water resources, plans and helps fund regional parks, and administers federal funds that provide housing opportunities for low- and moderate-income individuals and families. The 17-member Council board is appointed by and serves at the pleasure of the governor.

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## I. Introduction

### A. *Transition plan need and purpose*

The [Americans with Disabilities Act \(ADA\)](#) is a civil rights law prohibiting discrimination against individuals on the basis of disability. It was enacted on July 26, 1990, and was amended in 2008 with the ADA Amendments Act. 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 provided by public entities. The Metropolitan Council (Council) 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 Council has conducted a self-evaluation of its services, programs, activities, and facilities on public property and within public rights-of-way; and the Council has developed this transition plan detailing the methods to be used to ensure compliance with ADA accessibility requirements.

### B. *ADA and its relationship to other laws*

Title II of ADA is companion legislation to two previous federal statutes and regulations: the [Architectural Barriers Act \(ABA\) of 1968](#) and [Section 504 of the Rehabilitation Act of 1973](#).

The Architectural Barriers Act of 1968 is a federal law that requires facilities designed, built, altered, or leased with federal funds to be accessible. The Architectural Barriers Act marks one of the first efforts to ensure access to the built environment.

Section 504 of the Rehabilitation Act of 1973 is a federal law that protects qualified individuals from discrimination based on their disability. The nondiscrimination requirements of the law apply to employers and organizations that receive financial assistance from any federal department or agency.

Title II of ADA extended this coverage to all state and local government entities, regardless of whether they receive federal funding.

## C. *Agency requirements*

Under Title II, the Council must meet these general requirements ([28 CFR Sec. 35](#)):

- Must operate their programs so that, when viewed in their entirety, the programs are accessible to and useable by individuals with disabilities.
- May not refuse to allow a person with a disability to participate in a service, program, or activity simply because the person has a disability.
- Must make reasonable modifications in policies, practices, and procedures that deny equal access to individuals with disabilities unless a fundamental alteration in the program would fundamentally alter the nature of the service, program, or activity.
- May not provide services or benefits to individuals with disabilities through programs that are separate or different unless the separate or different measures are necessary to ensure that benefits and services are equally effective.
- Must take appropriate steps to ensure that communications with applicants, participants, and members of the public with disabilities are as effective as communications with others.
- Must designate at least one responsible employee to coordinate ADA compliance. This person is typically referred to as the ADA Coordinator. The public entity must provide the ADA Coordinator's name, office address, and telephone number to all interested individuals.
- Must provide notice of ADA requirements. All public entities, regardless of size, must provide information about the rights and protections of Title II to applicants, participants, beneficiaries, employees, and other interested persons. The notice must include the identification of the employee serving as the ADA Coordinator and must provide this information on an ongoing basis.
- Must establish a grievance procedure. Public entities must adopt and publish grievance procedures providing for prompt and equitable resolution of complaints. This requirement provides for a timely resolution of all problems or conflicts related to ADA compliance before they escalate to litigation and/or the federal complaint process.

### **Minnesota State Building Code, Chapter 1341**

The Minnesota State Building Code regarding accessibility was implemented in November 1975 and updated in January 1996, May 1999, July 2007, and most recently in January 2015. Any building remodeled, constructed, or having a change of occupancy after that date must comply with Minnesota State Building Code, Chapter 1341 design guidelines. Currently the building code is made up of the Chapter 11 of the International Building Code 2012, ICC/ANSI A117.1- 2009 and MN amendments to those documents. The Minnesota State Building Code, Chapter 1341 is enforced by local or state building officials for projects that require a permit.

#### *D. Designation of responsibility*

The Council has designated the following person to serve as ADA Title II Coordinator to oversee the Council's policies and procedures:

Cyrenthia Jordan

ADA Title II Coordinator, Director, Office of Equal Opportunity

The ADA Title II Coordinator has designated the following person to serve as ADA Administrator to monitor the Council's progress and manage review and updates of this document:

Guthrie Byard

ADA & Title VI Administrator, Office of Equal Opportunity

## II. Self-evaluation and approach

### A. Overview

Under Title II of the ADA, public entities are required to perform a self-evaluation of their current services, policies, and practices with regard to accessibility to the public. The goal of the self-evaluation is to verify that, in managing its programs and facilities, the agency is providing accessibility and not adversely affecting the full participation of individuals with disabilities.

The intent of the ADA self-evaluation is to review the agency's public programs and services, including all public and support facilities, in order to identify any obstacles or barriers to accessibility that need to be addressed. The general categories of items to be evaluated include:

#### Programs and services

Identify all programs, activities, and services and their locations.

#### Building facilities

These include administrative offices, bus garages, project offices, maintenance facilities, wastewater treatment plant public tour routes, and access to, approach, entry, and exiting of facility employee access areas.

#### Policies and procedures

An agency's policies and procedures should be reviewed to determine whether they ensure an equal opportunity for people with disabilities to participate and benefit.

#### Public input

Public entities are required to provide an opportunity for interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the self-evaluation process by submitting comments. A public entity that employs 50 or more persons is required, for at least three years following the completion of the self-evaluation, to maintain on file and make available for public inspection a list of the interested persons consulted, a description of areas examined and any problems identified, and a description of any modifications made.

### B. Process

In 2019, the Council, along with JQP, Inc., completed a self-evaluation of its services, programs, activities, and public and support facilities. An important component of the self-evaluation process is the identification of obstacles or barriers to accessibility and the corresponding modifications that will be needed to remedy these items. The following sections provide a summary of ADA and accessibility improvements recently made, before detailing Council plans to address self-evaluation findings and recommendations.

The Council intends for its ADA Transition Plan to be a living document that is updated regularly to reflect progress towards addressing ADA compliance issues. Therefore, timelines



for addressing the findings of the self-evaluation are not set beyond 2020. This plan will be updated regularly with realistic and more immediate timelines for addressing barriers programs, services, and facilities.

### *C. Policies and procedures*

The Council is currently redesigning its process for creating, reviewing, and revising all Council policies and procedures. The new process will greatly improve the viability and understanding of Council efforts using plain language and digital accessibility standards. This revised process will also ensure that proper vetting of new policies and procedures is conducted while not placing undue burden on the minor revisions or removal of outdated or irrelevant policies or procedures.

Another goal for the Council is to analyze current policies and procedures for gaps. To accomplish this the Council is creating a review team with representatives from each division and functional area. This review team will be charged with two major tasks:

1. Reviewing all policy procedures for consistency, clarity and compliance including ADA compliance and accessibility standards.
2. Help the Council prioritize and direct staff to review and update old policy and create new policy.

ADA compliance and accessibility has already been identified as a top area for review. Future updates to this transition plan will include updates on the Council's review of policies and procedures.

### *D. Programs and services*

Title II of ADA includes the following requirements regarding programs and services and communications:

- General
  - A public entity shall take appropriate steps to ensure that communications in its programs and services with applicants, participants, and members of the public with disabilities are as effective as communications with others.
  - A public entity shall furnish appropriate auxiliary aids and services where necessary to afford an individual with a disability an equal opportunity to participate in, and enjoy the benefits of, a service, program, or activity conducted by a public entity.
  - In determining what type of auxiliary aid and service is necessary, a public entity shall give primary consideration to the requests of the individual with disabilities.
- Information and signage
  - A public entity shall ensure that interested persons, including persons with impaired vision or hearing, can obtain information as to the existence and location of accessible services, activities, and facilities.
  - A public entity shall provide signage at all inaccessible entrances to each of its

facilities, directing users to an accessible entrance or to a location at which they can obtain information about accessible facilities. The international symbol for accessibility shall be used at each accessible entrance of a facility.

### **Website and digital accessibility initiatives**

The Council initiated a multi-year project with two vendors to conduct ongoing user and accessibility testing of our digital-facing assets, including MetroTransit.org and MetroCouncil.org, to conform with Section 508 and Web Content Accessibility Guidelines (WCAG). The user and accessibility testing will be conducted over the next three years.

The project also includes a Councilwide digital practices review that will inform how the Council creates accessible documents, presentations, and videos and improves the accessibility of its procurement processes. This work is expected to be complete in early 2020.

### **Environmental Services public tours**

The Council conducts several tours each year at six of its nine wastewater treatment plants: Seneca, Metropolitan, Empire, East Bethel, Eagles Point, and Blue Lake. Upon request by local officials or lawmakers, tours are provided at the other three plants. Following is the language shared on the [public tours webpage on MetroCouncil.org](#) for registering for a tour:

The Environmental Services division of the Council operates the regional wastewater collection and treatment system that serves 110 communities in the Minneapolis-St. Paul metropolitan area.

Every day, the Council's nine treatment plants treat approximately 250 million gallons of wastewater to protect public health and the environment.

Several of our treatment plants offer a limited number of tours each month to show the general public how the water they use from nature is cleaned and safely returned to the environment.

Visitors see the various ways pollutants are removed from wastewater – replicating nature's own processes, but in a much-condensed time frame. They also may see how wastewater solids are processed so that they can be beneficially re-used, and how energy is recovered along the way to power Council treatment plants.

#### **General information**

- Tours are free.
- Tours are available during business hours, Monday to Friday.
- Reservations must be made at least 4-5 weeks in advance, and are on a first-come, first-served basis.
- Tours are about 90-120 minutes long, beginning with an orientation video and ending with a question-and-answer session.
- The age minimum for tour participants is seventh grade.
- The minimum group size is 10 people; maximum is 30. Larger groups will be

considered based on staff availability. There should be one teacher/chaperone for every 10 students.

- Tour guides are the employees who operate and manage the plants. They provide a thorough, step-by-step explanation of wastewater treatment.

### **Scheduling a tour**

Contact Britni Kesselring at [Britni.Kesselring@metc.state.mn.us](mailto:Britni.Kesselring@metc.state.mn.us) with the following information:

- Contact name and phone number
- Company or organization name and phone number
- Mailing and e-mail addresses
- Requested date, time and treatment plant
- Number of visitors and teachers/chaperones
- If you require any special accommodations for mobility or other disabilities, please include this in your email.
- If we're able to accommodate your tour request, we'll send you a confirmation letter, our Plant Tour Safety and Security Rules, and additional information.

### **Recent improvements to Council programs and services**

Below are recent improvements to Council programs and services, followed by the department(s) involved in the effort:

- Installed audio induction loops in several meeting rooms.
  - Information Services
- Initiated a Councilwide project to assess digital accessibility practices and improve accessibility across Council websites and applications.
  - Information Services, Communications, Metro Transit, Office of Equal Opportunity
- Established an accessible documents training program for staff who generate communications and marketing materials.
  - Office of Equal Opportunity, Communications
- Conducted a management training for all Council managers on topics of accessibility including digital and physical accessibility that has led to a series of division-specific accessibility initiatives over the next few years.
  - Human Resources, Office of Equal Opportunity, Communications
- Held biannual Metro Mobility community conversations to improve program and service implementation and incorporate more rider feedback into Metro Mobility processes.

- Metropolitan Transportation Services, Communications
- Regional Parks and Trails Department implemented an equity toolkit to guide the grant decision-making process for parks partners.
  - Community Development, Communications
- Regional Parks and Trails department created an Equity Grants Program with emphasis on projects that improve access to parks by people with disabilities.
  - Community Development, Communications

### III. Self-evaluation findings and planned improvements

#### A. ADA self-evaluation survey

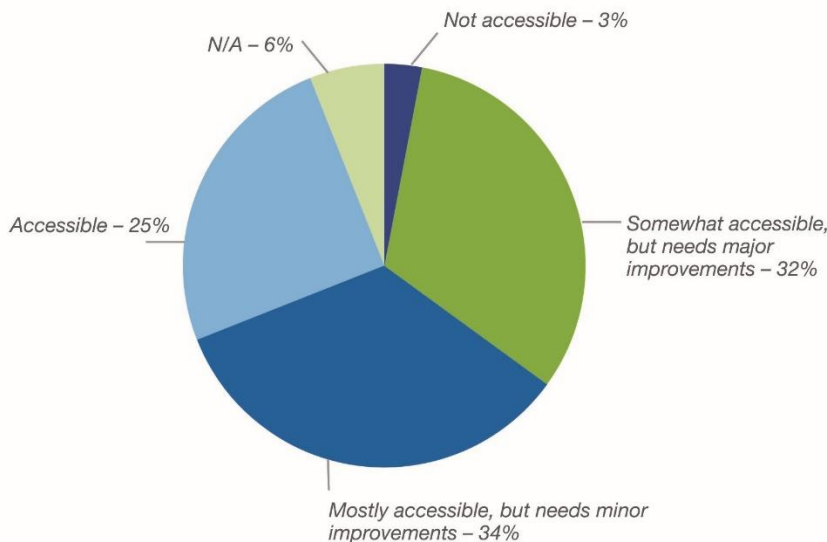
The Council created and conducted a detailed evaluation of the accessibility of its programs and services. One survey focused on the broader community, including customers and stakeholders, and the other surveyed Council staff. Both surveys were open from July until early September 2019.

Below are summary findings from the community survey. The results will inform improvements made to programs and services in 2020 and beyond. A copy of the questions and additional findings can be provided by contacting the Council’s ADA & Title VI Administrator.

#### Community survey results

Community members filling out the survey are primarily using public transit services, including Metro Mobility service for people who have disabilities. About 35% of respondents use regional parks and trails and 5% live in public housing.

Survey respondents indicated that overall, Council programs and services are accessible, mostly accessible, or somewhat accessible.



When asked if they couldn’t use services because of accessibility issues, only a handful of respondents noted specific problems:

- Lack of good, accessible information about services
- Distance from public transportation (making it infeasible to use)
- Crowded public transportation, with limited access to accessible seats and features
- Some transit facilities feel unsafe and are poorly maintained
- Limited funds and availability for housing

- Some park facilities are not accessible
- Expensive to use Metro Mobility
- Poor access to transit in the winter, due to poor snow removal

The survey also asked a series of questions about where to prioritize accessibility improvements. Responses align with the gaps identified above: people need more and better information about services, employment opportunities, and Council decision-making, and they recommend improvements to transit and regional parks.

- Highest priorities:
  - Metro Transit buses and bus stops
  - Metro Mobility
  - Websites
  - Access at regional parks, including play areas, restrooms, trails
- Other priorities:
  - Marketing, communications
  - Customer service
  - Physical access to buildings, facilities, rail platforms
  - Employment, internships
  - Council-led community meetings and events
  - Emergency procedures and action plans

### Highest priorities



*Metro Transit buses and bus stops*



*Metro Mobility*



*Websites*



*Access at regional parks, including play areas, restrooms, trails*

### Other priorities



Marketing, communications



Employment, internships



Customer service



Council-led community meetings and events



Physical access to buildings, facilities, rail platforms



Emergency procedures and action plans

Survey respondents also noted the need to make improvements in public housing. Metro HRA owns and operates a small percentage of public housing units in the region, and its primary

work is providing Section 8 housing vouchers for obtaining affordable housing throughout the region.

### Council staff survey results

A similar survey was also administered to Council staff, assessing how they would rate the Council's accessibility, as well as whether they understand how to make services accessible and how to help community members if they need accommodations.

As with community survey respondents, a similar proportion of staff indicated that overall, Council programs and services are accessible, mostly accessible, or somewhat accessible.

Staff also identified similar priorities for accessibility improvements.

- Top ten areas for improvements:
  - Metro Transit buses and bus stops
  - Public amenities in Council facilities, including doors, restrooms, service counters
  - Websites
  - Employee meetings and events
  - Marketing and communications materials
  - Employment/internships
  - Emergency procedures and action plans
  - Access at regional parks, including play areas, restrooms, trails
  - Council-led community meetings and events
  - Access to public housing

### Top 10 areas for improvements



This plan identifies the ways the Council will respond to these results, both with staff training and resources and with changes and improvements to facilities and services.

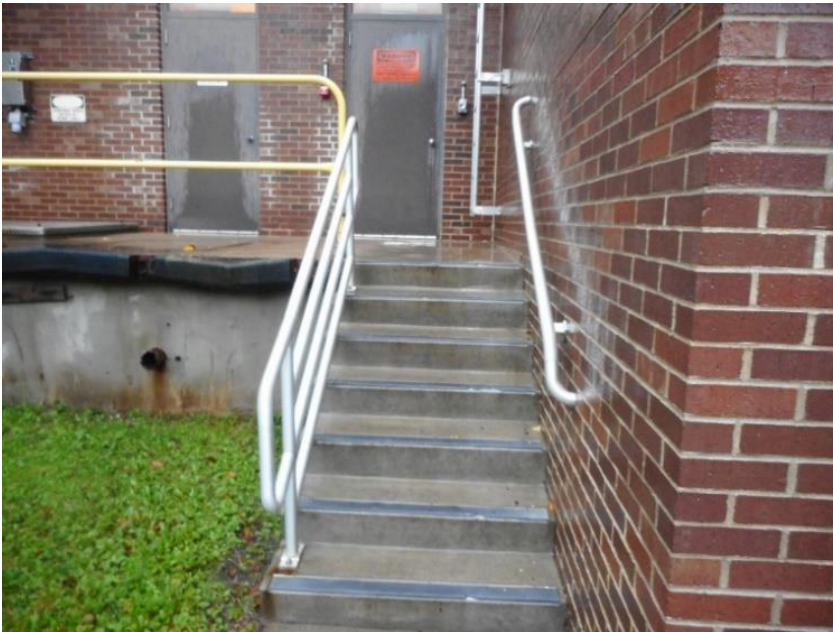
## B. *Programs and services improvement schedule*

### Environmental Services tour route findings

The self-evaluation identified several barriers along each tour route. The photo below shows stairs leading to a building's entrance on a tour route. Below is an example of how the findings were shared in each facility report:

**Finding:** MN 1341 1104.4. Multiple locations along the tour route include interior and/or exterior stairs; at some locations an alternate route is available that does not include steps (such as using the freight elevator in the Blower building or entering via an overhead garage door).

**Solution:** Reroute the tour as needed to accommodate participants. Locations not currently on an accessible route include: Headworks Building.



Environmental Services will be reviewing their tour routes to ensure that each route is made accessible upon request. This will involve adding an opportunity to request accommodation to the registration process. This would allow accommodations to be made in advance that would determine which route is taken and if any additional accommodations are needed during the tour.

### Planned program and service improvements

Based on community survey feedback, the Council plans to implement improvements to programs, services, and communications for the following items:

- Council staff will be trained on ADA programmatic and design standards as well as universal design practices.
  - Office of Equal Opportunity, Metro Transit, Environmental Services



- Pilot and further develop onboard bus detour communication.
  - Metro Transit
- Further pilot to use app-based beacon Bluetooth technology for public transit wayfinding for persons of low-vision or who are blind.
  - Metro Transit
- Develop accessible map and wayfinding signage guidelines at multimodal transfer points.
  - Metro Transit
- Reinforce bus stop snow removal guidelines that support multi-agency efforts to address impact on mobility for people with disabilities.
  - Metro Transit
- Guidance resources on maintaining accessibility during projects will be provided to the design and construction personnel.
  - Environmental Services
- Develop facility maps that provide accessibility information and detail accessible routes.
  - Environmental Services
- Environmental Services staff will be trained on making documents, web content, and other communication tools accessible.
  - Environmental Services
- Environmental Services managers and leaders will be trained on how to make administrative functions accessible.
  - Environmental Services

## C. Facilities

The following facilities were reviewed as part of the ADA self-evaluation.

### Metro Transit facilities

#### Transit centers and park-and-rides:

- 63rd Ave & Bottineau Blvd Street
- 65th Ave & Brooklyn Blvd
- Brooklyn Center Transit Center
- Chicago Lake Transit Center
- Christ Episcopal Church
- Church of Nazarene
- Church of St. William
- Co Rd 73 & I-394 North
- Co Rd 73 & I-394 South
- Como & Eustis
- Cottage Grove
- Excelsior City Hall
- Faith-Lilac Way Lutheran Church
- Foley Blvd
- Forest Lake Transit Center
- Ft Snelling Station North
- Ft Snelling Station South
- Gateway Transit Center
- General Mills Blvd & I-394
- Grace Church
- Guardian Angels Catholic Church
- Hadley Ave & Upper 17th
- Hwy 7 & Texas Ave
- Hwy 7 & Vinehill Rd
- Hwy 36 & Rice St
- Hwy 61 & Co Rd C
- Hwy 61 & Lower Afton Rd
- Hwy 100 & Duluth
- Hwy 252 & 66th Ave
- Hwy 610 & Noble
- I-35 & Kenrick Ave
- I-35E & County Road 14
- I-35E & County Road E
- I-35W & 95th Ave
- I-35W & Co Rd C
- I-35W & Co Rd H
- Lakeville Cedar Park & Ride
- Leamington Transit Center
- Little Canada Municipal Lot
- Louisiana Ave Transit Center
- Maple Plain
- Maplewood Mall Transit Center
- Minnetonka Blvd & Baker Rd
- Minnetonka Blvd & Steele St
- Mound Transit Center
- Navarre Center
- Newport Transit Station
- Normandale Village
- Northtown Transit Center
- Park Place & I-394
- Paul Parkway
- Plymouth Road Park & Ride
- Ramp A/7th Street Transit Center
- Ramp B/5th Street Transit Center
- Robbinsdale Transit Center
- Rosedale Transit Center
- Roseville Skating Center
- Richardson Park
- Running Aces
- Salem Covenant Church
- Shoreview Community Center
- Smith Ave Transit Center
- South Bloomington Transit Center
- Southdale Transit Center

- St. Croix Valley Recreation Center
- St. Edward's Catholic Church
- St. Joseph's Church
- St. Luke's Lutheran Church
- Starlite Transit Center
- Sun Ray Transit Center
- Union Depot Transit Center
- Uptown Transit Center
- Wayzata Blvd & Barry Ave
- West River Rd & 117th Ave
- West St. Paul Sports Complex
- Westwood Lutheran Church
- Woodbury Theatre

**Rail stations:**

- 28th Avenue Station
- 38th Street Station (Hiawatha Ave)
- 46th Street Station (Hiawatha Ave)
- 50th Street Minnehaha Park Station
- Airport Terminal 1 Lindbergh Station
- Airport Terminal 2 Humphrey Station
- American Blvd 34th Ave Station
- Anoka Station
- Big Lake Station
- Bloomington Central Station
- Cedar–Riverside Station
- Coon Rapids–Riverdale Station
- Elk River Station
- Fort Snelling Station
- Franklin Avenue Station
- Fridley Station
- Government Plaza Station
- Lake Street Midtown Station
- Mall of America Station
- Nicollet Mall Station
- Ramsey Station
- Target Field Station
- US Bank Stadium Station
- VA Medical Center Station
- Warehouse District/Hennepin Avenue Station

**Bus rapid transit:**

- 140th Street Station
- 147th Street Station
- Apple Valley Transit Station
- Cedar Grove Transit Station
- I-35W & 46th St Station (future METRO Orange Line bus rapid transit)

### Support facilities:

- 24th St Warehouse – MOW Building/Storage
- Blue Line Extension Project Office
- East Metro Garage
- Heywood Garage
- Heywood Lower Parking Lot
- Heywood Office
- Maintenance Way
- Martin J Ruter Garage
- Minneapolis Transit Store
- Nicollet Garage
- Northstar Big Lake
- Operations Support Center
- Overhaul Base
- Rail Operations & Maintenance Facility
- Saint Paul Operations & Maintenance Facility
- Saint Paul Transit Store
- South Garage
- Southwest Project Office
- Transfer Road Facility
- Transit Control Center

### Environmental Services facilities

#### Wastewater treatment plants:

- Blue Lake Plant, Shakopee
- Eagles Point Plant, Cottage Grove
- East Bethel Plant, East Bethel
- Empire Plant, Farmington
- Hastings Plant, Hastings
- Metropolitan Plant, St. Paul
- Rogers Plant, Rogers
- Seneca Plant, Eagan
- St. Croix Valley Plant, Oak Park Heights

#### Office buildings:

- Metropolitan Council offices, St. Paul
- Regional Maintenance Facility, Eagan

### Recent Metro Transit ADA and accessibility improvements

Over the last few years, the Council has implemented the following accessibility improvements to its transit facilities:

#### Better Bus Stops program:

- Improved font and visibility of bus stop signs and schedules to adhere to ADA

requirements.

- Installed 135 new shelters with accessible boarding pads.
- Replaced 132 aged advertising shelters with standard shelter models.
- Designed new two-foot-deep slim shelter for constrained conditions and to allow larger mobility devices to pass by or maneuver around the bus stops. This new design was installed at 37 bus stops with constrained conditions.
- Installed ADA pads at 92 bus stops without shelters.
- Added ADA-compliant pedestrian curb ramps at several intersections to allow access to bus stops.
- Completed accessibility evaluations of approximately 400 of the more than 900 on-street bus shelters owned by Metro Transit.

#### **Bus rapid transit:**

- Constructed 39 new A Line and C Line station platforms along existing route 84 and route 14 corridors.

#### **Light rail stations:**

- Installed between-car bollards as a pilot at the METRO Green Line Raymond Avenue Station.
- Installed detectable warnings at light rail track crossings on the METRO Blue Line.
- Coordinated installation of accessible pedestrian signals with the City of Bloomington at the Blue Line American Blvd Station.

#### **Support facilities:**

- Restriped Blue parking lot at Heywood Office and Police Facility to include new accessible routes, parking stalls, and signage to conform with the ADA requirements.
- Installed hearing loops at the Heywood Office and Police Facility in two conference rooms, the front desk, and the Council chambers meeting room.
- All new Metro Transit cubicles are equipped with sit/stand desks to conform to the preferred height of the occupant.

#### **Park-and-ride facilities:**

- Improved accessible route and pedestrian ramps at the Plymouth Road Park & Ride.
- Replaced pavers, relocated ADA parking spaces, and replaced pedestrian ramps at the Wayzata Blvd & Barry Ave Park & Ride.
- Improved paving, restriped parking spaces, and increased the number of accessible parking spaces at Woodbury Lutheran Church Park & Ride.

- Restriped parking spaces and replaced accessibility signage at eight park-and-rides: 63rd & Bottineau Blvd, County Rd 73 & I-394, Cottage Grove, Hwy 36 & Rice St, Hwy 61 & Lower Afton Rd, Hwy 100 & Duluth St, 610 & Noble Pkwy, and I-35 & Kenrick Ave.

### **Recent Environmental Services ADA and accessibility improvements**

Starting in 2019, the Council undertook numerous projects to improve accessibility across several Environmental Services facilities prior to conducting a self-evaluation.

#### **Metro Plant:**

- Installed power-assisted doors.
- Installed hearing loop in one training room.
- Upgraded elevators to meet ADA compliance.

#### **Robert Street:**

- Added office-wide adjustable desks and monitor stands.
- Installed hearing loops in five training rooms.
- Upgraded elevators to meet ADA compliance.

#### **Regional Maintenance Facility:**

- Installed power-assisted doors.
- Added office-wide adjustable desks and monitor stands.
- Upgraded elevators to meet ADA compliance.

#### **Tour routes:**

- Purchased 32 audio transceivers for use during plant tours.

## Survey methodology

JQP, Inc., used a 4-level priority rating system when conducting their work. This helped the Met Council prioritize the findings. Below is the criteria for each priority level.

### Priority 1:

Recommendations are issues for upgrade of the highest priority.

- A barrier to participate in a program, activity or service
- An element or location that receives high public use
- An area that needs to be accessible without the luxury of time to prepare to accommodate an individual request
- A safety concern
- A programmatic (non-architectural) fix
- Easy to modify
- Inexpensive

### Priority 2:

Recommendations continue to provide greater levels of accessibility.

- A barrier to a significant number of individuals with disabilities
- A location that receives high public use
- A unique area or element, not typically duplicated
- An area where there is a short period of time to plan for accommodating the request of an individual
- Easy to modify
- Inexpensive

### Priority 3:

Issues are recommendations to provide convenience of accessibility, such as additional locations of drinking fountains, toilet rooms, entrances, etc.

- A duplicated element or program
- A barrier to fewer individuals with disabilities
- A barrier that does not allow for full or independent participation in a program by an individual with a disability
- An area where there is a greater amount of time to prepare for the arrival of an individual with a disability

- Substantial deviation from the standard (e.g., 21-inch centerline for a toilet versus 16 inches to 18 inches)

**Priority 4:**

Recommendations are design elements that would be required for new construction but in existing buildings do not critically affect the impact on program accessibility. These are recommended to be improved when the space undergoes repair, replacement, or remodeling.

- A duplicated element or program
- An area used primarily by employees (e.g., circulation corridors, employee-only toilet rooms)
- Employee-only work areas
- Maintenance or replacement
- Not technically feasible to modify at existing facilities

**Facility findings**

The self-evaluation involved survey site reviews at 144 Council facilities, including more than 200 facility-connected bus stops. Each facility received a report listing all barriers based on a 4-level priority rating scale. Over 3,000 barriers were identified with priority level 3 being the most common. Below are three tables depicting the number of priority issues by level and facility type, as well as a few examples of findings at Council facilities.

Metro Transit Facility Type	Priority 0	Priority 1	Priority 2	Priority 3	Priority 4	Total
BRT	0	5	33	31	8	77
Park-and-Ride	0	28	206	409	162	805
Transit Centers	0	5	57	133	74	269
Rail Stations	0	5	137	292	136	570
Support Facilities	44	9	134	434	302	923
<b>Total</b>	<b>44</b>	<b>52</b>	<b>567</b>	<b>1299</b>	<b>682</b>	<b>2644</b>



RA Locations	Priority 1	Priority 2	Priority 3	Priority 4	Total
Central Office	0	24	62	67	153
Jackson St.	3	6	23	4	36
<b>Total</b>	<b>3</b>	<b>30</b>	<b>85</b>	<b>71</b>	<b>189</b>

ES Facilities	Priority 1	Priority 2	Priority 3	Priority 4	Total
Metro 94 office	0	15	28	10	53
Regional Maintenance Facility	0	9	13	34	56
Blue Lake WWTP	2	6	15	5	28
Metro WWTP	2	39	30	23	94
Eagles Point WWTP	1	8	16	5	30
East Bethel WWTP	1	0	13	10	24
Hastings WWTP	0	6	11	5	22
Empire WWTP	2	24	45	6	77
St. Croix Valley WWTP	0	10	4	16	30
Seneca WWTP	2	20	20	12	54
Rogers WWTP	0	1	10	4	15
<b>Total</b>	<b>10</b>	<b>138</b>	<b>205</b>	<b>130</b>	<b>483</b>



The picture to the left shows a cross slope of 8.1% (above the 1:48 threshold required by ANSI 403.3). This is an example of a complicated fix since the bus shelter is connected to heat and light and cannot be easily relocated.



The photo to the left is an example of a simple fix that requires Metro Transit public facilities staff to relocate the receptacle to make the power-assisted door functional.



The photo to the left shows a faded ADA parking sign that needs to be replaced. Some of the fixes require a bulk purchase of replacement signage to address issues at our transit facilities.

## D. *Facility improvement schedules*

The following tables represent the projects at Metro Transit public and support facilities, including its environmental services facilities.

The Council may choose to modify priorities to allow flexibility in accommodating community requests, petitions for reasonable modifications from persons with disabilities, changes in Council programs, ongoing evaluation, and funding constraints and opportunities. It is not financially feasible to remove all barriers to access immediately. It is the goal of the updated ADA Transition Plan to provide access to the programs, activities, and services provided by the Council. The Council has ongoing programs that monitor proposed alteration projects and include the review of the various accessibility concerns identified, in order to bring facilities to current ADA standards when projects take place. The Council plans to remove barriers over time, as indicated by the implementation schedule.

### **Transit Asset Management**

Transit Asset Management is an asset management strategy that is mandated by the Federal Transit Administration. This strategy utilizes systematic means of managing assets throughout the asset's entire service life. The data for Metro Transit assets from this ADA self-evaluation will be managed through the Metro Transit Asset Management System (MTrAMS) and as findings are remediated, they will be completed in the system. The history of these findings and actions taken will remain associated with these assets until the end of their service life. This will allow for the planning of deficiency remediation and tracking of issues to completion and will also allow for future historical reviews.

### **Methodology for Metro Transit improvements**

Metro Transit will address accessibility barriers through ongoing capital projects. In addition, Metro Transit will dedicate staff for a review of the most severe barriers identified (Levels 1 and 2) to identify future capital project needs or other actions to remove barriers. After analyzing the data, there are 91 Level 1 and 597 Level 2 priorities.

Planned resolutions could be:

- A planned upcoming capital project
- A new project that needs to be scoped
- A determination that the correction has been resolved
- A recommendation to defer the correction until a future capital project or some other opportunity occurs

### **2020 Metro Transit ADA and accessibility improvement schedule**

Below are the Metro Transit facilities improvements scheduled for 2020.

#### **Rail stations:**

- Install between-car bollards and door locator tiles at all light rail stations, starting in 2020.
- Install barriers, tactile warnings, and accessible pedestrian signals at the end of the

center platform at the Hennepin-Warehouse Station to direct pedestrians to street crossings. This project is part of the City of Minneapolis' Hennepin Avenue reconstruction project.

**Park-and-rides:**

Improve paving, striping, signage, and pedestrian ramps at five park-and-rides:

- Highway 61 & County Road C
- I-35W & County Road H
- Fort Snelling Station North Lot
- South Bloomington Transit Center
- Woodbury Theatre

**Transit centers:**

- Renovate Brooklyn Center Transit Center
- Rebuild Northtown Transit Center
- Replace Robbinsdale Transit Center pavers

**Better Bus Stops program:**

- Replace 35 aged shelters
- Install 25 new shelters
- Install up to 50 ADA pads at unsheltered stops
- Continue accessibility evaluation of remaining 500+ bus shelters started in 2019
  - Nearly 400 shelters have been reviewed (through 2019)
- Initiative efforts to conduct a systematic ADA compliance review of all other Metro Transit bus stops

**Enhanced shelters and bus rapid transit stations:**

- Build enhanced shelters on Hennepin Avenue in downtown Minneapolis
- Build enhanced shelter at 6th/Jackson in downtown Saint Paul
- Replace bus stops along I-35W at Lake St and at 66th St with new METRO Orange Line stations

**Support facilities:**

- Construct new driver break room and entrance in Heywood Garage
- Upgrade first floor bathrooms in the Heywood building to be ADA compliant

## Implementation coordination

Many other agencies control the right-of-way where Metro Transit bus stops are located. The Council has coordinated with those agencies to assist with identifying and facilitating elimination of accessibility barriers along their routes. Examples of how the Council is coordinating efforts to improve accessibility of its services and programs include:

- Participating in site plan reviews for developments adjacent to bus stops and transit facilities with the cities of Minneapolis and Saint Paul.
- Coordinating with MnDOT and other roadway authorities in the design of bus stops associated with roadway reconstruction projects.
- Coordinating with the cities of Minneapolis and Saint Paul to improve snow removal at high-density downtown bus stops.

## Methodology for Environmental Services improvements

While most of the Environmental Services facilities are not public, tours are recognized as an important public outreach tool. Environmental Services has prioritized tour routes for accessibility improvements. These improvements will be made through procedural changes, maintenance work orders, and planned capital projects (through its Approved Capital Program).

## 2020 Environmental Services ADA and accessibility improvement schedule

These priority areas for Environmental Services (including Council administrative buildings) were identified in the self-evaluation:

- Modify tour routes and procedures to avoid barriers and improve accessibility.
- Issue work orders to mitigate tour route barriers that cannot be easily avoided.
- Make centralized purchases of materials and services needed to address high-priority barriers in public areas (e.g., purchasing staple style stall door handles or lowering of toilet room dispensers).
- Identify capital projects through which barriers in public areas of facilities can be removed.
- Request special funding for major improvements for which no other funding source is available.

## IV. Engagement

### A. External

#### Public participation

The Council recognizes that public participation is an important component in the development of this transition plan. Input from the community has been gathered and used to help define priority areas for improvements.

Public outreach for preparation of this document consisted of the following activities:

- Community listening session at ThinkSelf, a school for the deaf in St. Paul, MN (July 18, 2019)
- Community listening session at Vision Loss Resources, a sight loss advocacy agency serving the metropolitan area, located in Minneapolis, MN (July 30, 2019)

### B. Internal

#### Transportation Accessibility Advisory Committee

The Transportation Accessibility Advisory Committee (TAAC) advises the Council on management policies for public transportation services in the region from the perspective of riders with disabilities. Created by the Minnesota Legislature, the TAAC includes riders and advocates for older people and the disability community, as well as representatives of service providers and other appropriate agencies.

The TAAC was asked to complete the community ADA self-evaluation survey to provide input on Council programs and services, including public transportation. Their results are being used to inform ADA compliance and accessibility projects.

#### Equity Advisory Committee

The Equity Advisory Committee (EAC) advises the Council in its work to advance equity in the metropolitan region. In forming the EAC in October 2015, the Council affirmed its commitment in [Thrive MSP 2040](#) to ensure that residents and communities are full partners in making the decisions that affect them.

The goal of this work is to create more equitable outcomes for the people who live and work in the region. For the purpose of this committee, equity is defined by Thrive MSP 2040 as:

Equity connects all residents to opportunity and creates viable housing, transportation, and recreation options for people of all races, ethnicities, incomes, and abilities so that all communities share the opportunities and challenges of growth and change. For our region to reach its full economic potential, all residents must be able to access opportunity. Our region is strong when all people live in communities that provide them access to opportunities for success, prosperity, and quality of life.

In July 2019, the EAC was surveyed for their understanding of the ADA to direct specific trainings for the committee to improve their ability to advise on future Council accessibility and

ADA compliance efforts. While four of the seven respondents stated that they either were extremely or very familiar with the ADA and its requirements, there were several requests for training on the ADA and transportation, housing, communications, employment, and parks. The responses will help inform training in 2020 and beyond will improve the committee's ability to advise the Council on such efforts. EAC members were also asked to complete the community ADA self-evaluation survey to provide input on Council programs and services.

### *C. Public comment period*

The ADA Transition Plan was made available for public comment from January 20, 2020, to February 17, 2020. Comments are being solicited via the Council's Accessibility webpage as well as a dedicated webpage for Council public comments. Comments are accepted by contacting the Council's Public Info line at 651-602-1500 or [public.info@metc.state.mn.us](mailto:public.info@metc.state.mn.us). Comments will be used to inform updates to the plan before it is made final.

## V. Transition plan updates

This transition plan is a living document that will continue to be updated as conditions within the Council evolve. The initial schedule is to formally review the complete document (main body and appendices) at least once per year, to identify any need for updates. Updates to the appendices or attachments may be made more frequently as needed.

Any substantive updates to the main body of this document will include a public comment period to continue the Council's public engagement efforts.

The Council recognizes that ADA compliance is an ongoing responsibility that will require monitoring to identify future accessibility issues that may be encountered. For example, facilities that currently meet ADA requirements could fall out of compliance in the future due to factors such as damage, disrepair, or changes within public rights-of-way that could create new accessibility obstacles.

Therefore, the ADA Title II Coordinator and ADA & Title VI Administrator will establish an ongoing monitoring process to ensure that facilities continue to comply with ADA requirements. Council employees will also be encouraged to report any accessibility concerns or deficiencies that are identified.



## VI. Accessibility policy and accessible website and applications procedure

### A. Accessibility policy

It is the policy of the Council to provide people, with or without disabilities, access to the Council's services, technologies, communications, and facilities. The Council is committed to complying with applicable accessibility standards unless an undue burden exists.

The purpose of this policy and its supporting procedures is to ensure that Council staff, vendors, and contractors are aware of their responsibilities to develop and maintain accessible services, technologies, communications, and facilities. The Council's accessibility policy is in response to the [Americans with Disabilities Act of 1990 \(PDF\)](#), [Section 508 Amendment to the Rehabilitation Act of 1973](#), and the [Architectural Barriers Act of 1968 \(PDF\)](#).

The Office of Equal Opportunity is responsible for oversight of the Council's accessibility efforts. All Council employees are responsible for complying with this accessibility policy and supporting procedures. As the Council moves toward accessibility compliance, it is understood that reaching full compliance will be a deliberate process implemented over time.

Our strategy is to take a phased approach; make as many services, facilities, communications, and technologies accessible as possible at the time they are created; modify those already existing as feasible; and take advantage of new tools and techniques as they emerge.

### B. Development of accessible website and applications procedure

This procedure is designed to clarify the use of industry guidelines for web accessibility development (also known as WCAG, or the Web Content Accessibility Guidelines) and software development using the Software Development Life Cycle (SDLC) in the development, testing, and deployment of the Council's websites and applications.

Related Information Services standards and staff actions:

- The Council's standard for accessible sites and applications is WCAG 2.0 AA.
- The Council's Information Services staff will work to achieve WCAG 2.0 AA compliance by:
  - Focusing initial efforts on meeting compliance in new development of Council websites and applications; and
  - Making existing Council websites and applications accessible as they are modified or replaced over time.
- Information Services hiring managers and supervisors will address the need for accessibility in the recruiting process for developers, with desirable qualifications for knowledge and skill of accessible web development.
- Newly hired Information Services developers will receive accessibility policies and procedures as part of the onboarding process.
- For all developers, Council management will promote the need for accessibility in

development by providing training and other needed resources to support this policy and procedure.

- Managers and supervisors will continue to support all developers in working towards compliance.
- Links to information related to the development standards and life cycle are located at the end of the procedure.

#### Roles and responsibilities:

- Office of Equal Opportunity (OEO):
  - OEO is responsible for the Accessibility Policy and is the Council's authority to ensure compliance with accessibility standards.
  - OEO is responsible for coordinating Councilwide accessibility compliance.
  - OEO is responsible for identifying and engaging resources to do hands-on testing to evaluate compliance with the WCAG 2.0 AA standards.
  - In the absence of a project manager, OEO will consult the Council's Office of General Council (OGC), as necessary, for statements of accessibility and other matters with legal implications.
- Information Services:
  - The project manager is responsible for consulting with OEO and the OGC, as necessary, for statements of accessibility and other matters with legal implications.
  - Managers of developers will promote awareness and understanding of the accessibility standards and provide the relevant training and resources to achieve them.
  - Developers will utilize available training and resources and develop sites and applications to achieve compliance with accessibility standards.
  - Developers will apply appropriate testing methods during development and unit testing.
  - Developers must document deviations from the accessibility standards that cannot be corrected and receive the approval of OEO for those deviations.
- Communications:
  - The Communications Department maintains style guides and design standards for Council information products.
  - Communications staff are available for consultation on web design, usability (including accessibility), and testing.
  - As indicated in the Public Website Procedure (Council Procedure 2-4g), in certain cases related to public-facing websites, excluding MetroTransit.org, Communications has approval authority that includes "Creation and enforcement of accessibility, usability, and 'findability' standards."
- Metro Transit Creative Services:
  - Creative Services is responsible for brand identity standards, web style guides,

- and design guidelines for transit information products.
- Creative Services staff are available for consultation on web design, usability (including accessibility), and testing.

## **VII. Public notice of ADA requirements and ADA grievance procedure**

### *A. Public notice of ADA requirements*

As required by the Americans with Disabilities Act (ADA), the Council has posted the following notice outlining its responsibilities regarding ADA compliance.

#### **ADA public notice**

In accordance with the Americans with Disabilities Act (ADA), the Council does not discriminate based on disability in its programs, services, activities, and employment practices.

#### **Effective communication**

Upon request, auxiliary aids and services for effective communication (such as a sign language interpreter, an assistive listening device, or print material in digital format) or modifications in programs, services, or activities, will generally be made. Please contact the coordinator of the event, program, or service.

#### **Modifications to policies and procedures**

The Council will make reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all its programs, services, and activities.

The ADA does not require the Council to take any action that would fundamentally alter the nature of its programs or services or impose an undue financial or administrative burden.

### *B. ADA grievance procedure*

#### **Title II ADA grievance procedure**

This Title II ADA grievance procedure is established to meet the requirements of the ADA. The ADA provides comprehensive civil rights protections to persons with disabilities in the areas of employment, state and local government services, access to public accommodations, transportation, and telecommunications. Title II covers state and local government and any of its departments, agencies, or other instrumentalities.

The ADA mandates that individuals with disabilities shall not be excluded from participation in, denied the benefit of, or be subjected to discrimination under any program or activity.

This Title II ADA grievance procedure can be used by anyone who wishes to file a complaint alleging discrimination based on disability in the provision of services, activities, programs, or benefits by the Council.

The relevant department(s) will be notified of the grievance and will work with the complainant to resolve the issue. A response will be shared with the complainant and will explain the position of the Council and offer options for substantive resolution of the complaint. If the response by the Council does not satisfactorily resolve the issue, the complainant may appeal the decision. The Council will meet with the complainant to discuss the complaint and possible resolutions before responding with a final resolution.

If you have questions about the grievance procedure, please contact:

Guthrie Byard  
ADA and Title VI Administrator  
Office of Equal Opportunity  
[Guthrie.Byard@metc.state.mn.us](mailto:Guthrie.Byard@metc.state.mn.us)

### **Process for filing a Title II ADA grievance**

Please submit your grievance by filling out the grievance form online or in writing. If in writing, please provide your name and contact information as well as the description of the issue, remedy you're seeking, and whether you have filed a complaint with another agency. If so, please list that agency.

All written grievances should be mailed to:

Office of Equal Opportunity  
560 6th Ave North  
Minneapolis, MN 55411

## VIII. Agency contact information

### ADA Title II Coordinator

Cyrenthia Jordan  
390 Robert St. N. St. Paul, MN 55101  
Phone: 651-602-1085  
E-mail: [Cyrenthia.Jordan@metc.state.mn.us](mailto:Cyrenthia.Jordan@metc.state.mn.us)

### ADA & Title VI Administrator

Guthrie Byard  
560 6th Ave N. Minneapolis, MN 55411  
Phone: 612-349-7762  
E-mail: [Guthrie.Byard@metc.state.mn.us](mailto:Guthrie.Byard@metc.state.mn.us)

## IX. Appendix

### A. *Facility reports*

The Council conducted a detailed ADA evaluation of its public, support, environmental services, and administrative facilities, and the bus stops connected to those facilities. Due to the size and amount of reports, they can be requested by contacting Guthrie Byard, ADA & Title VI Administrator, at [guthrie.byard@metc.state.mn.us](mailto:guthrie.byard@metc.state.mn.us) or 612-349-7762.

### B. *Community survey*

For a full list of questions and responses to the community survey, please contact Guthrie Byard, ADA & Title VI Administrator, at [guthrie.byard@metc.state.mn.us](mailto:guthrie.byard@metc.state.mn.us) or 612-349-7762.



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