

ADA Transition Plan 2021

The Americans with Disabilities Act Notice:

In accordance with the requirements of the Title II of the Americans with Disabilities act of 1990 (“ADA”), Valley Transit will not discriminate against individuals with disabilities on the basis of disability in its services or locations.

Official Responsible:

The responsibility for ensuring the implementation of this plan is vested with the Valley Transit General Manager, Angie Peters.

Alternative Formats:

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A digital version of this document is available for download on the agency website at <https://www.valleytransit.com/>. You may also request physical copies be printed at the Valley Transit administration building, subject to the public records fee after the first copy.

Acknowledgments:

Valley Transit would like to thank all organizations and individuals who contributed to this project. A full list can be found in Appendix E. This was a truly collaborative venture that could not have happened without community input, creativity, and participation from many people.

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Introduction

This plan is intended to be a living document, with the scheduled capital projects adjusted as projects are completed or new projects are identified by changing community needs or Valley Transit services. These capital projects will be covered in more detail later in this plan, but there are currently multiple bus stops that have a legacy exemption for their current layout due to being installed well before the Americans with Disabilities Act (ADA) of 1990. However, per Section 28 § 35.151 of Title II of the ADA, their exemption status would be revoked in the event a substantial construction project takes place near them. The living nature of this plan would allow for Valley Transit to include the newly triggered construction project without requiring a full ADA Transition Plan update.

This ADA Transition Plan affirms and formalizes the long-standing commitment of Valley Transit to remove barriers in accessibility of its services and locations. In the development of this plan, Valley Transit has completed a self-assessment of all transit facilities and services to determine what barriers may exist for individuals experiencing disabilities. In addition to the existing Valley Transit ADA Policy, this assessment and transition plan are required and mandated by federal laws and local Washington State guidelines.

Legal Requirements

Section 504 of the Rehabilitation Act (1973)

Section 504 of the Rehabilitation Act of 1973 states that no person with a disability shall be excluded from participation in, denied the benefits of, or be subjected to discrimination under any program or activity that receives Federal funding.

Section 504 extends to the entire operation of a recipient or sub-recipient, regardless of the specific funding source of a particular operation. Section 504 Regulations (49 CFR Part 27.5) define a recipient as any public entity that receives Federal financial assistance from the United States Department of Transportation (USDOT) or its operating administrations either directly or through another recipient. An example of a recipient is Washington State Department of Transportation (WSDOT). An example of a sub-recipient is a local agency receiving USDOT funds through WSDOT, for projects/programs/activities administered by the local agency.

Americans with Disabilities Act

The Americans with Disabilities Act of 1990 is a civil rights statute that prohibits discrimination against people who have disabilities. There are five separate Titles, or sections, of the Act that cover different aspects of potential discrimination. These include Title I – Employment, Title II – Public Services and Transportation, Title III – Public Accommodations, Title IV – Telecommunications, and Title V – Miscellaneous. Title II of the Act specifically addresses the subject of making public services and public transportation accessible for those with disabilities. Designing and constructing facilities for public use that are not accessible by people with disabilities constitutes discrimination.

The ADA is mirrored after Section 504 but extends the reach of Federal accessibility laws to include those agencies that are not recipients or sub-recipients of Federal funding. Title II (28 CFR Part 35) of the ADA specifically pertains to state and local governments.

The ADA applies to all facilities, including facilities built before and after 1990. State and local government and public entities or agencies are required to perform self-assessment of their current facilities, relative to the accessibility requirements of the current ADA accessibility standards. The transition plan formal procedures outlined in 28 CFR Part 35.150 only govern those public entities with more than 50 employees.

The transition plan shall, at a minimum –

- A. Identify physical obstacles in the public entity's facilities that limit the accessibility of the programs or activities to individuals with disabilities;
- B. Describe in detail the methods that will be used to make the facilities accessible;
- C. Specify the schedule for taking the steps necessary to achieve compliance with this section and, if the time period of the transition plan is longer than one year, identify steps that will be taken during each year;

D. Indicate the official responsible for the implementation of the plan.

ADA Standards for Accessible Design (ADAS) of 2010

The document established a standard document in which all Federal ADA standards are collectively held. The ADAS and regulations from the 28 CFR Part 26 replaced the 1991 ADA Accessibility Guidelines. These standards and regulations were used in the Valley Transit self-assessment and transition plan.

Draft Guidelines for Accessible Public Rights-of-Way and Proposed Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG)

The Draft Guidelines for Accessible Public Rights-of-Way was published by the US Access Board in 2005. The Proposed Guidelines for Pedestrian Facilities in Public Right-of-Way was published for comment in 2011. The 2005 and 2011 guidelines are commonly referred to as PROWAG and have not yet been adopted as standards. However, even with this delay, many public entities currently use PROWAG as 'best practice' for features within the public rights-of-way not covered by ADAS and this practice has been endorsed by the Federal Highway Administration (FHWA) and the US Access Board. These standards were used in the Valley Transit self-assessment and transition plan.

Self-Assessment and Current Barriers to Accessibility

Title II of the ADA requires that jurisdictions evaluate services, programs, policies, and practices to determine their compliance with the nondiscrimination requirements. A non-infrastructure assessment was done in 1991 as part of developing the first ADA Policy for the agency and has been renewed and adjusted as needed, with the most recent update in 2019, to ensure continued accessible practices. At the development of this policy, it was understood by the agency that our bus stops were exempted from ADA requirements based on when they were deployed. During the 2020-2021 Comprehensive Operational Analysis, performed by DanTec Inc., this understanding was brought into question due to the less than accessible features of 12% of system bus shelters. This prompted the agency to complete a detailed infrastructure assessment of bus stops and other transit facilities and to investigate which, if any, bus stops experience a legacy exemption due to being placed before 1990. This list was compiled with the understanding that construction or enhancement at exempted locations would still trigger the need to alter the bus stop if it is not fully compliant with ADA regulations and requirements. It is important to note here that a fixed bus stop (i.e., a stop with a designated location on a system map) is considered to be a transit facility and is thus held to the accessibility level of a facility/building.

Method

The assessment of bus stops checked for the following:

- Does the bus stop have a clear, level surface that can be traversed by a mobility device?
- Is that surface at least 5 feet wide and 8 feet deep, measured perpendicular to the curb?
- If there is a bench, is there a clear path of travel, or in the case of a shelter, is there a cut out from the bench of at least 30 inches to allow a mobility device to pull fully into the shelter?
- Is the bus stop connected to a sidewalk (or another fully accessible path)?
 - As part of this evaluation, in the event a sidewalk existed, the agency also tested for if the sidewalk slope was 1:48 or less, and sidewalks not meeting this was reported to the city or county responsible for them.

Transit Center – 108 West Main Street, Walla Walla

This facility was built well after the implementation of the ADA standards and was reviewed by the construction contractor, an engineering firm contracted by the agency, an independent contractor, and agency staff at the time of construction for ADA compliance. No construction or non-cosmetic alteration has occurred at this location; thus, it was left off of the 2021 self-assessment. The need to include this facility in future assessments will be reviewed at the beginning of all future assessments.

Administration Facility – 1401 West Rose Street, Walla Walla

The administration facility, located at 1401 West Rose Street in Walla Walla Washington was found to be largely compliant with all standards and regulations. However, the following areas were identified as needing adjustment:

Location	Correction	Timeline
ADA Ramp to Main Entrance	Surface out of proper operating condition standards, slope correction needed, truncated domes and detectible warning pavers needed	2023-2024
ADA Ramp to Side Entrance	Surface out of proper operating condition standards, slope correction needed, truncated domes and detectible warning pavers needed	2023-2024

After construction is completed to correct the ramp deficiencies, the need to include this facility on future assessments will be reviewed at the beginning of all future assessments.

Bus Stops

All bus stops used by Valley Transit, including Flag Stops which are not traditionally considered a fixed bus stop or a transit facility, were reviewed for compliance with all standards and regulations. Valley Transit has 219 bus stops listed on the iTransitNW website, a tool that shows the scheduled time points as well as additional stops on each route. While a stop may not be a measured time point on a bus system, listing it on a schedule or map escalates it to being considered a ‘fixed stop’ which is subject to all ADA requirements. Fifty-five of these stops are flag stops. At the time of this assessment, an updated photo inventory of all stops was created and is available upon request.

Common Issues or Transitions

Curb Extension: Several bus stops were identified as needing some form of a curb extension. A landing area with a solid area attached to the curb is at least five feet parallel to the street and eight feet perpendicular to the street. Throughout the system, there are several areas where the sidewalk or landing area is not connected to the roadway or curb. In many cases, there is a patch of grass or some other buffer between the sidewalk/landing area and the roadway. From the average pedestrian’s point of view, this is a good design because you need reasonable space to separate the pedestrian from traffic. However, a person with a disability needs an accessible pathway to the road to board and alight a bus. Additionally, ramps/lifts require a hard, level surface to be effectively deployed safely.

Bus Stop Removal: *Bus Stop Guidelines: Design and Amenity Standards* include recommendations on inter-stop distance policies. Though each stop must be treated on an individual basis, for high to moderately densely populated areas it is recommended there be a stop no more than every one-quarter mile. If two stops are located within one-quarter mile of each other, it is not recommended that both stops be improved, but rather one is removed to comply with established guidelines and the other be improved. This impacts several stops throughout the system due to a legacy policy of leaving much shorter inter-stop distances. This transition plan will address formally changing this policy through Appendix C and a forthcoming update to the Valley Transit Service Standards.

The following bus stops were identified as needing adjustment:

Shelters			
<i>Green highlight acknowledges the stop experiences a legacy exemption but has been selected for proactive adjustment</i>			
For stops involving concrete work, if the property owner does not consent, they will be listed going forward as 'as accessible as is feasible' unless/until consent is given in the future.			
Stop #	Location	Deficiency	Transition Plan
VT1	Transfer Center (4 total)	Lacks proper mobility device space	Modify bench to clear minimum 32" space
VT104	College Ave. & 10 th	Lacks proper mobility device space	Modify bench to clear minimum 32" space
VT112	College Ave. & NE C St.	Lacks proper mobility device space	Modify bench to clear minimum 32" space
VT117	Rose & Wallula	Lacks proper mobility device space	Modify bench to clear minimum 32" space
VT121	Rose & Offner	Lacks proper mobility device space	Modify bench to clear minimum 32" space
VT126	Rose & 13 th	Lacks proper mobility device space	Modify bench to clear minimum 32" space
VT128	Main & 10 th	Lacks proper mobility device space	Modify bench to clear minimum 32" space
VT135	Isaacs & Valencia	Lacks proper mobility device space, landing pad doesn't meet ADA requirements	Remove shelter/stop, this is no longer safe due to changes in road design & traffic
VT150	Isaacs & BMI LLC	Lacks proper mobility device space	Modify bench to clear minimum 32" space
VT154	WWCC Parking Lot	Lacks proper mobility device space	Modify bench to clear minimum 32" space
VT168	Isaacs & Ash	Lacks proper mobility device space	Modify bench to clear minimum 32" space
VT183	Family Medical Center	Lacks proper mobility device space	Modify bench to clear minimum 32" space
VT193	College Ave. & 4 th	Lacks proper mobility device space	Modify bench to clear minimum 32" space
VT332	2 nd & Penny Lane	Lacks proper mobility device space	Modify bench to clear minimum 32" space
VT372	2 nd & Morton	Lacks proper mobility device space	Modify bench to clear minimum 32" space
VT430	Wilbur & Walla Walla	Lacks proper mobility device space	Modify bench to clear minimum 32" space
VT445	Wilbur & Blue Mt. Apts.	Lacks proper mobility device space	Modify bench to clear minimum 32" space
VT471	Rose & Palouse	Lacks proper mobility device space	Modify bench to clear minimum 32" space
VT570	Sprague & Malcolm	Lacks proper mobility device space	Modify bench to clear minimum 32" space
VT595	5 th & Birch	Lacks proper mobility device space	Modify bench to clear minimum 32" space
VT630	Kelly Place Parking Lot	Lacks proper mobility device space	Modify bench to clear minimum 32" space
VT645	Myra & Fort Walla Walla	Lacks proper mobility device space	Modify bench to clear minimum 32" space
VT650	Myra & Poplar	Lacks proper mobility device space	Modify bench to clear minimum 32" space
VT940	Edith & 9 th	Lacks proper mobility device space	Modify bench to clear minimum 32" space
VT974	Pine and DSHS Office	Lacks proper mobility device space	Modify bench to clear minimum 32" space
VT985	Pine and Cayuse	Lacks proper mobility device space	Modify bench to clear minimum 32" space

* Two inches have been added to the ADA open space minimum as part of the bench modification plan to accommodate the growing trend of oversized mobility devices.

Simme Seats			
For stops involving concrete work, if the property owner does not consent, they will be listed going forward as 'as accessible as is feasible' unless/until consent is given in the future.			
Stop #	Location	Deficiency	Transition Plan
VT124	Rose & Woodland	Landing pad doesn't meet ADA requirements	Work with business to add concrete extension to reach compliance
VT151	Isaacs & Tausick Way	Landing pad doesn't meet ADA requirements	Work with business to extend concrete into the parking lot to correct the slope issue, or list as 'accessible to the full extent practical' if they are unwilling

VT161	Alder & Wilbur	Landing pad doesn't meet ADA requirements	Work with business to add concrete extension to reach compliance
VT170	Isaacs & Roosevelt	Landing pad doesn't meet ADA requirements	Recommended for removal due to higher levels of use at nearby stops, and the environment at the stop lacks enough space to reach compliance
VT240	Academy & 3 rd	Landing pad doesn't meet ADA requirements	Speak with homeowner about extending the concrete pad by 5 inches to reach compliance, or list as 'accessible to the full extent practical' if they are unwilling
VT245	Academy & 2 nd	Landing pad doesn't meet ADA requirements	Speak with landowner about extending the concrete pad by 5 inches to reach compliance, or list as 'accessible to the full extent practical' if they are unwilling

Sign Only			
For stops involving concrete work, if the property owner does not consent, they will be listed going forward as 'as accessible as is feasible' unless/until consent is given in the future.			
Stop #	Location	Deficiency	Transition Plan
VT136	Isaacs & Stanton	1' 6" short of fully accessible concrete pad	Concrete work at location
VT144	Isaacs & Cascade/Cedar	1' 6" short of fully accessible concrete pad	Concrete work at location
VT171	Isaacs & White	1' 6" short of fully accessible concrete pad, retaining wall obstruction	Relocate to the East on newer sidewalk with no retaining wall issue
VT173	Isaacs & Clinton	No sign, landing pad not ADA compliant	Remove bus stop, this was a temporary stop due to past construction work
VT174	Isaacs & Estrella	1' 6" short of fully accessible concrete pad	Concrete work at location
VT175	Isaacs & Penrose	1' 6" short of fully accessible concrete pad, retaining wall obstruction	Concrete work, possible relocation
VT202	SE 12 th & Broadway	Bench obstructs fully compliant pad space	Move bench back 6 inches
VT210	Date & 11 th	Landing pad not ADA compliant, no sidewalk connection	Remove stop, this street will likely not be traveled on with planned route changes, and current utilization is low
VT260	Whitman & Mulberry Court	Sign on the lawn behind a retaining wall	Moving the sign to the wall leaves well over the requisite landing space on the wide shoulder (this is where passengers are already loading)
VT275	Larch & Whitman	Landing pad not ADA compliant	Concrete work, possible relocation
VT278	Larch & 5 th	Landing pad not ADA compliant	Remove stop (low use, nearby stops)
VT280	Larch & 6 th	Landing pad not ADA compliant	Concrete work at location
VT320	2 nd & Morton	Landing pad not ADA compliant	Relocate due to slope issue, add 1' 6" concrete at new location
VT328	2 nd & Edwards	1' 6" short of fully accessible concrete pad	Concrete work, possible relocation
VT336	2 nd & Parkwood Circle	Landing pad not ADA compliant	Relocation required due to retaining walls, possibly remove stop
VT348	Fern & Fern Court	Landing pad not ADA compliant, no sidewalk connection	Concrete & slope correction work
VT356	Tietan & Howard	1' 6" short of fully accessible concrete pad	Fix broken concrete at location
VT360	2 nd & Edwards	1' 6" short of fully accessible concrete pad	Relocation required due to hedge wall
VT605	Poplar & 6 th	Landing pad not ADA compliant	Concrete work at location
VT905	2 nd & Cherry	Landing pad not ADA compliant	Relocate sign to existing compliant pad

VT910	2 nd & Oak	Landing pad not ADA compliant	Concrete work at location
VT935	4 th & Reese	Landing pad not ADA compliant, no sidewalk connection	Concrete & slope correction work
VT970	Pine & Myra	Landing pad not ADA compliant	Concrete work at location
VT975	Pine & Irene	Landing pad not ADA compliant, steep slope issue	Remove as formal stop due to safety issues, and shelter stop within 500 feet

The Valley Transit flag stops exist in a grey area due to being listed at fixed locations on the iTransitNW website. This practice treats them like a fixed bus stop location, so they were reviewed for ADA compliance. Currently, flag stops on the Valley Transit bus system do not generate enough ridership, and in some cases lack adequate space to make them fully accessible, to be considered for transition to a traditional signed bus stop with a concrete landing pad. Eleven flag stops with above-average ridership levels for this stop and located where there are less formal bus stops in general, were prioritized for adjustment to a signed stop with educational signage on how to utilize a flag stop along any route.

The following were found to require adjustment or removal from the website:

Flag Stops			
<i>Green highlight acknowledges the stop experiences a legacy exemption but has been selected for proactive adjustment</i>			
Stop #	Location	Deficiency	Transition Plan
VT113	Rose & NE Ash	Landing pad not ADA compliant & lacks signage	Convert to signed stop with flag stop education included
VT254	Whitman & Ash	Landing pad not ADA compliant & lacks signage	Convert to signed stop with flag stop education included
VT364	2 nd & Sheridan	Landing pad not ADA compliant & lacks signage	Convert to signed stop with flag stop education included
VT439	Isaacs & McDonalds/ Wilbur & Tacoma	Landing pad not ADA compliant & lacks signage	Convert to signed stop with flag stop education included
VT520	Chestnut & Sprague	Landing pad not ADA compliant & lacks signage	Convert to signed stop with flag stop education included
VT575	Chase & Garrison School	Landing pad not ADA compliant & lacks signage	Convert to signed stop with flag stop education included
VT610	9 th & Poplar	Landing pad not ADA compliant & lacks signage	Convert to signed stop with flag stop education included
VT710	Howard & Locust	Landing pad not ADA compliant, lacks signage, & no sidewalk	Convert to signed stop with flag stop education included
VT965	Dell & Irene	Landing pad not ADA compliant & lacks signage	Convert to signed stop with flag stop education included
?VT999	13 th & Paine (Stop currently has no #)	Landing pad not ADA compliant & lacks signage	Convert to signed stop with flag stop education included
?VT3102	Twin Creek Place & Myra (Stop currently has no #)	Lacks signage	Convert to signed stop with flag stop education included
VT145	Isaacs & McDonalds	Landing pad not ADA compliant & lacks signage	Un-list from map, but allow flag stops
VT148	Isaacs & Link	Landing pad not ADA compliant & lacks signage	Un-list from map, but allow flag stops
VT156	Tausick Way & Garrison	Landing pad not ADA compliant & lacks signage	Un-list from map, but allow flag stops
VT159	Alder & Berney	Landing pad not ADA compliant & lacks signage	Un-list from map, but allow flag stops
VT160	Alder & School	Landing pad not ADA compliant & lacks signage	Un-list from map, but allow flag stops

VT177	Main & Touchet	Landing pad not ADA compliant & lacks signage	Un-list from map, but allow flag stops
VT181	Main & 8 th	Landing pad not ADA compliant & lacks signage	Un-list from map, but allow flag stops
VT190	Rose & Damson	Landing pad not ADA compliant & lacks signage	Un-list from map, but allow flag stops, re-list after city sidewalk project
VT205	SE 12 th & Cotter Place	Landing pad not ADA compliant & lacks signage	Un-list from map, but allow flag stops
VT212	Date & 8 th	Landing pad not ADA compliant & lacks signage, & no sidewalk	Un-list from map, but allow flag stops
VT215	Date & 6 th	Landing pad not ADA compliant, lacks signage, & no sidewalk	Un-list from map, but allow flag stops
VT225	4 th & College	Landing pad not ADA compliant & lacks signage	Un-list from map, but allow flag stops
VT235	4 th & Davis	Landing pad not ADA compliant & lacks signage	Un-list from map, but allow flag stops
VT250	Whitman & Davis	Landing pad not ADA compliant & lacks signage	Un-list from map, but allow flag stops
VT285	Larch & 8 th	Landing pad not ADA compliant & lacks signage	Un-list from map, but allow flag stops
VT312	2 nd & Chestnut	Landing pad not ADA compliant & lacks signage	Un-list from map, but allow flag stops
VT316	2 nd & Maple	Landing pad not ADA compliant & lacks signage	Un-list from map, but allow flag stops
VT324	2 nd & Providence West	Landing pad not ADA compliant & lacks signage	Un-list from map, but allow flag stops
VT354	Tietan & Hillbrooke	Landing pad not ADA compliant & lacks signage	Un-list from map, but allow flag stops
VT374	2 nd & Chestnut	Landing pad not ADA compliant & lacks signage	Un-list from map, but allow flag stops
VT376	2 nd & Whitman	Landing pad not ADA compliant & lacks signage	Un-list from map, but allow flag stops
VT409	Rose & Touchet	Landing pad not ADA compliant & lacks signage	Un-list from map, but allow flag stops
VT448	Wilbur & Hobson	Landing pad not ADA compliant & lacks signage	Un-list from map, but allow flag stops
VT468	Palouse & Alder	Landing pad not ADA compliant & lacks signage	Un-list from map, but allow flag stops
VT510	Chase and Stahl	Landing pad not ADA compliant & lacks signage	Un-list from map, but allow flag stops
VT515	Chase & Chestnut	Landing pad not ADA compliant & lacks signage	Un-list from map, but allow flag stops
VT535	9 th & Orchard	Landing pad not ADA compliant & lacks signage	Un-list from map, but allow flag stops
VT560	4 th & Willard	Landing pad not ADA compliant & lacks signage	Un-list from map, but allow flag stops
VT565	4 th & Malcom	Landing pad not ADA compliant & lacks signage	Un-list from map, but allow flag stops
VT716	Bryant & Howard	Landing pad not ADA compliant & lacks signage	Un-list from map, but allow flag stops, consider for future conversion to signed stop due to sidewalk presence
VT720	Bryant & Fern	Landing pad not ADA compliant, lacks signage, & no sidewalk	Un-list from map, but allow flag stops
VT728	Bryant & School	Landing pad not ADA compliant, lacks signage, & no sidewalk	Un-list from map, but allow flag stops

VT736	School & Pleasant	Landing pad not ADA compliant, lacks signage, & no sidewalk	Un-list from map, but allow flag stops
VT740	Pleasant & Ankeny	Landing pad not ADA compliant & lacks signage	Un-list from map, but allow flag stops
VT756	Pleasant & Division	Landing pad not ADA compliant & lacks signage	Un-list from map, but allow flag stops
VT915	Pine & 7 th	Landing pad not ADA compliant & lacks signage	Un-list from map, but allow flag stops
VT925	9 th & Paine	Landing pad not ADA compliant & lacks signage	Un-list from map, but allow flag stops
VT930	Moore & 7 th	Landing pad not ADA compliant & lacks signage	Un-list from map, but allow flag stops
VT990	Pine & 7 th	Landing pad not ADA compliant & lacks signage	Un-list from map, but allow flag stops

Several bus stops were identified as having a legacy exemption due to their placement before 1990. These remain subject to regulations if/when construction on or near them would require updates to bring them into compliance. The following bus stops will be monitored for potential triggers, such as new construction, in the future:

Legacy Exemption Bus Stops			
Stop #	Stop Type	Location	Deficiency
VT130	Sign	Main & 6 th	Landing pad not ADA compliant
VT138	Sign	Isaacs & Division	Landing pad not ADA compliant
VT140	Sign	Isaacs & Roosevelt	Landing pad not ADA compliant
VT157	Simme Seat	Tausick Way & Parrish	Landing pad not ADA compliant
VT163	Sign	Wilbur & Blue Mt. Apts.	Landing pad not ADA compliant
VT164	Sign	Wilbur & University	Landing pad not ADA compliant
VT220	Sign	4 th & Date	Landing pad not ADA compliant
VT308	Sign	2 nd & Stahl	Landing pad not ADA compliant
VT352	Sign	Tietan & Dow	Landing pad not ADA compliant
VT418	Sign	Melrose & Valencia	Landing pad not ADA compliant
VT421	Sign	Melrose & Bonsella/ Division	Landing pad not ADA compliant
VT422	Sign	Melrose & White	Landing pad not ADA compliant
VT427	Sign	Melrose & Wilbur	Landing pad not ADA compliant
VT442	Sign	Wilbur & University	Landing pad not ADA compliant
VT451	Sign	Alder & Bridge	Landing pad not ADA compliant
VT453	Sign	Alder & McKinley	Landing pad not ADA compliant
VT456	Sign	Alder & Division	Landing pad not ADA compliant
VT462	Sign	Alder & Merriam	Landing pad not ADA compliant
VT505	Sign	5 th & Poplar	Landing pad not ADA compliant
VT525	Sign	9 th & Emma	Landing pad not ADA compliant
VT615	Sign	9 th & Willow	Landing pad not ADA compliant
VT712	Sign	Park & Newell	Landing pad not ADA compliant, scheduled for correction with city concrete work in summer of 2021 (work currently taking place)
VT724	Sign	Bryant & Sturm	Landing pad not ADA compliant, not connected to a sidewalk
VT732	Sign	School & Carl	Not connected to a sidewalk
VT744	Sign	Pleasant & Bridge	Landing pad not ADA compliant
VT748	Sign	Pleasant & Home	Landing pad not ADA compliant
VT752	Sign	Pleasant & Statesman	Landing pad not ADA compliant

VT760	Sign	Whitman & Maddison	Landing pad not ADA compliant
VT764	Sign	Park & Whitman	Landing pad not ADA compliant, grassy, scheduled for correction with city concrete work in summer of 2021 (work currently taking place)
VT980	Simme Seat	Pine & 13 th	Landing pad not ADA compliant

Identify Right-of-Way Issues

Outside of the Transfer Center at 108 West Main Street, Valley Transit does not own any of the land bus stops reside on. This creates a right-of-way issue for all bus stops in need of adjustment. An easement will be needed for each stop that has concrete work involved, in order for Valley Transit to make these stops compliant.

While easements will be requested for all stops in question, it is anticipated that the success rate on bus stops touching privately-owned home lots will not have 100% success. In these instances, the listing for these stops will be changed to indicate that these stops are as *accessible as feasible* due to their location (and the restrictions that come with that location). If this new listing will be required for a stop with very low utilization, Valley Transit may choose to remove the stop altogether. It is anticipated that easements near businesses, or on land owned by the City of College Place, the City of Walla Walla, or Walla Walla County will have a much higher success rate due to the associated entities being subject to their ADA requirements.

Each year, landowners with a stop scheduled for correction in the next year will be contacted to pursue an easement to facilitate the work. The exception to this will be 2022; at the launch of this plan, the landowners will be contacted in the same year construction is planned for. Because of this, very little concrete work is planned for 2022.

Prioritization and Barrier Removal

Two significant barriers were identified during this process: stops that cannot accommodate a mobility device inside the shelter and stops that lack a sufficient stable surface, free of gravel or vegetation, for the standard 5' x 8' requirement. To prioritize projects the agency took staffing levels, budget availability, and community-identified priority levels into account. The latter was collected through outreach meetings with local accessibility and disability advocacy groups, public meetings, and a community survey. Five routes were scored at the same level of importance by the community, so ridership levels for those routes were used to prioritize the work.

Valley Transit intends to remove all identified barriers by the end of 2028, however, it must be acknowledged that upgrades to four stops on Route 7 are tied to sidewalk work to be done by the City of Walla Walla and/or Walla Walla County. Currently, this is on the long-range plans for those agencies and may extend the completion date for those four stops beyond 2028.

Schedule

2022	
Stops to remove:	VT135
Benches to alter:	VT595, VT570, VT630, VT645, VT650, VT1(A-D), VT104, VT112, VT117, VT121, VT126, VT128
Concrete work:	VT240, VT245
2023	
Flag stops to un-list: (Timed with scheduled route changes)	VT113, VT145, VT148, VT156, VT159, VT160, VT177, VT181, VT205, VT212, VT215, VT225, VT223, VT235, VT250, 285, VT312, VT316, VT324, VT354, VT374, VT380, VT409, VT448, VT468, VT510, VT515, VT535, VT550, VT560, VT565, VT716, VT720, VT728, VT736, VT736, VT740, VT756, VT915, VT930, VT990
Stops to remove:	VT210, VT278
Benches to alter:	VT150, VT154, VT168, VT183, VT193, VT430, VT445, VT471, VT332, VT372, VT940, VT974, VT985
Concrete work:	VT260, VT275
Flag stop, new signage:	VT965

2024	
Stops to remove:	VT605, VT170
Concrete work:	VT280, VT124, VT136, VT151, VT161
Flag stop, new signage:	VT113
2025	
Stops to remove:	VT173
Concrete work:	VT139, VT144, VT174, VT175
Flag stop, new signage:	VT520, VT575
2026	
Concrete work:	VT320, VT328, VT336, VT348, VT356
Flag stop, new signage:	VT254, VT610
2027	
Concrete work:	VT360, VT905, VT910, VT935
Flag stop, new signage:	VT439, VT364
2028	
Concrete work:	VT970, VT975
Flag stop, new signage:	VT710, VT999, VT3102

Valley Transit will complete future assessments of the entire bus stop system. Assessments of this nature will happen at least once every ten years to identify any stops falling out of compliance, or any construction projects that Valley Transit was not notified of that may impact a bus stop experiencing a legacy exemption. Whenever possible, if construction issues arise between assessments, Valley Transit will seek to correct the issue off cycle of an official plan.

Public Complaint Process

Valley Transit is committed to providing safe, reliable, and accessible transportation services and facilities for the community. Valley Transit has established a Customer Complaint Policy, and customers wishing to file a complaint, suggest an alteration to make a facility more accessible, and/or to obtain a copy of the Customer Complain policy may contact Valley Transit at 509-525-9140, on the web at www.valleytransit.com, or in person at Valley Transit’s Administration Office located at 1401 West Rose Street, Walla Walla, Washington. (RCW 46.07b)

Complaints related to ADA/accessibility issues shall be assigned to the ADA Coordinator or the responsible individual for this ADA Transition plan, for investigation and follow-up. Valley Transit shall maintain a tracking system for all comments and complaints which provides a unique identification of each comment and allows ready access to information on the status of the comment at any time. The ADA/accessibility comment process (i.e., data entry, assignment, follow-up, response, and reporting) shall be managed by the Administration Department staff.

Valley Transit shall respond to the person commenting within fifteen (15) days of receipt of the comment, so long as the commenter has provided adequate contact information. Should the period of time needed for response exceed fifteen days, the person commenting shall be advised of the status, in addition to receiving a final response. Responses shall be in the requested format (e.g., written, verbal, email, and/or alternative accessible format).

Valley Transit shall ensure that the quality of service delivered to those submitting comments to the agency will not, in any way, be negatively impacted by submission.

Valley Transit shall provide a formal appeals process to all people who are unsatisfied with the outcome of their complaint. Appeal responses shall be in the format requested.

Action By	Action
Customer	Within 10 business days of receiving our response to the comment, the customer may submit in writing to the Operations Manager, a detailed explanation of why the response received is unsatisfactory.
Valley Transit Operations Manager	Investigate and respond to the submitted appeal within seven business days.
Customer	If not resolved satisfactorily, submit in writing to the General Manager, the reason(s) why the received appeal response is unsatisfactory within seven business days.
Valley Transit General Manager	Investigate and respond to appeals submitted within seven business days. The General Manager is the final level within the appeals process.

Responsible Individual

The responsibility for ensuring implementation of this plan is vested with:

Angie Peters, General Manager

Phone: (509) 525-9140

Email: angie@valleytransit.com

Mail: Valley Transit
1401 West Rose Street
Walla Walla, WA 99362

The Valley Transit ADA Coordinator is:

Briana Malmquist, Human Resources Manager

Phone: (509) 525-9140

Email: briana@valleytransit.com

Mail: Valley Transit
1401 West Rose Street
Walla Walla, WA 99362

Concerns about bus stops and service accessibility can also be directed to:

Lowell Nee, Operations Manager

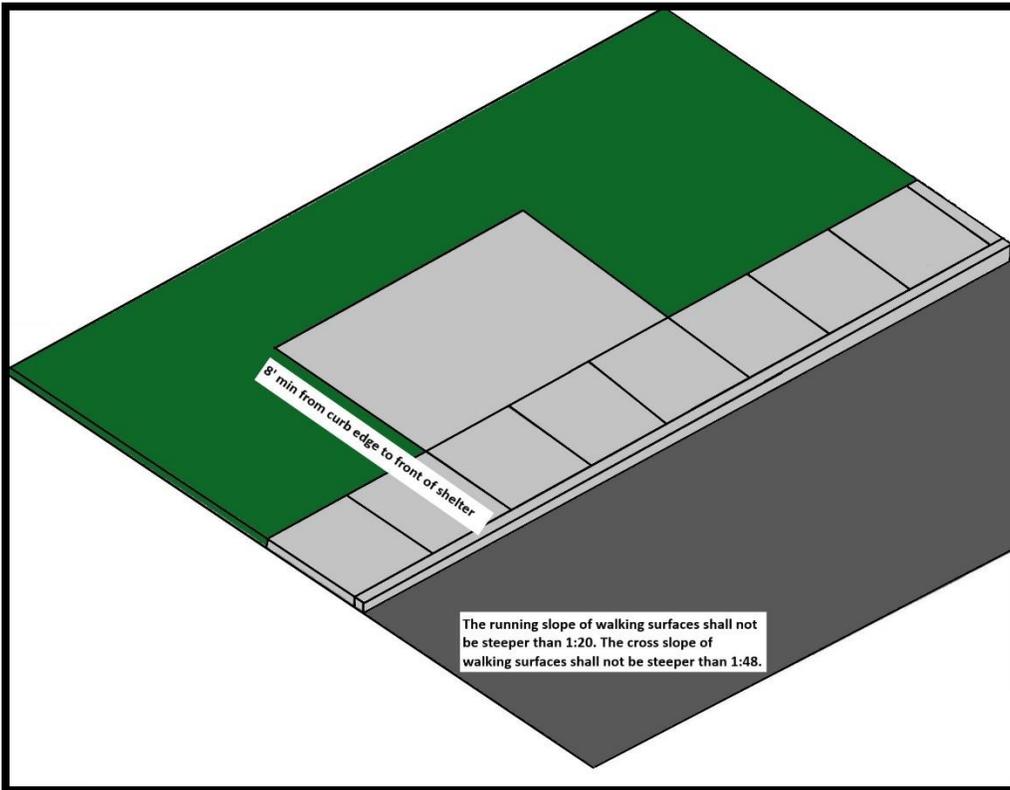
Phone: (509) 525-9140

Email: lowell@valleytransit.com

Mail: Valley Transit
1401 West Rose Street
Walla Walla, WA 99362

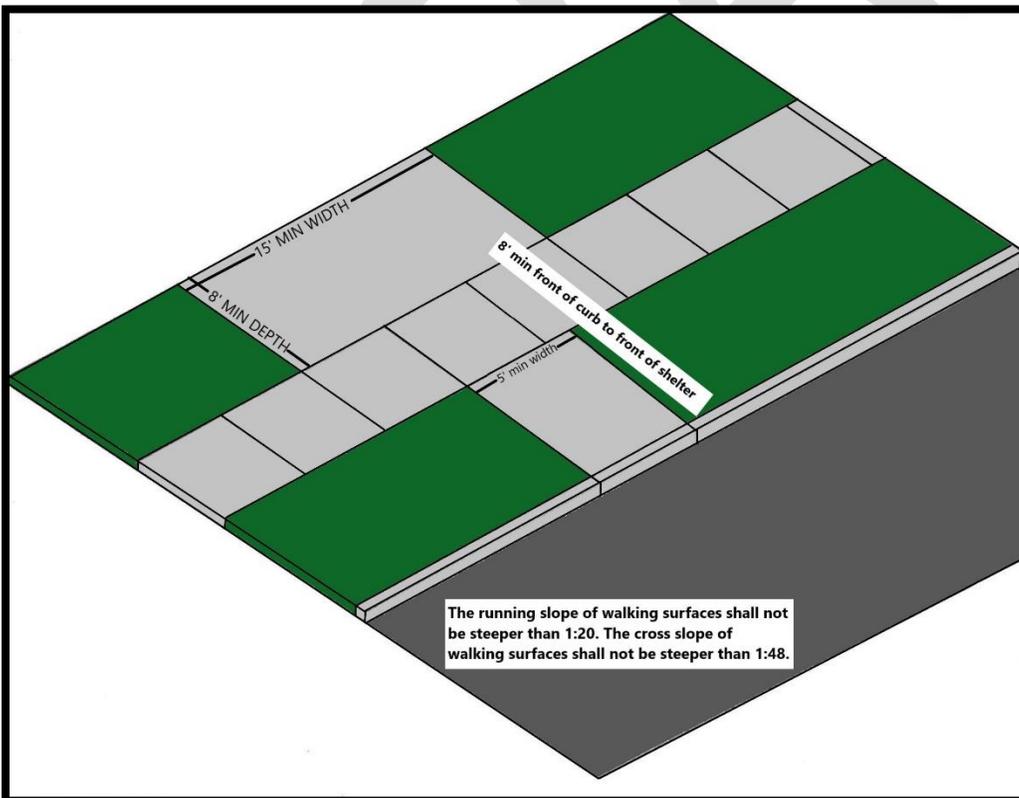
Appendix A: Bus Stop Standard Designs

Shelter Stop Standard



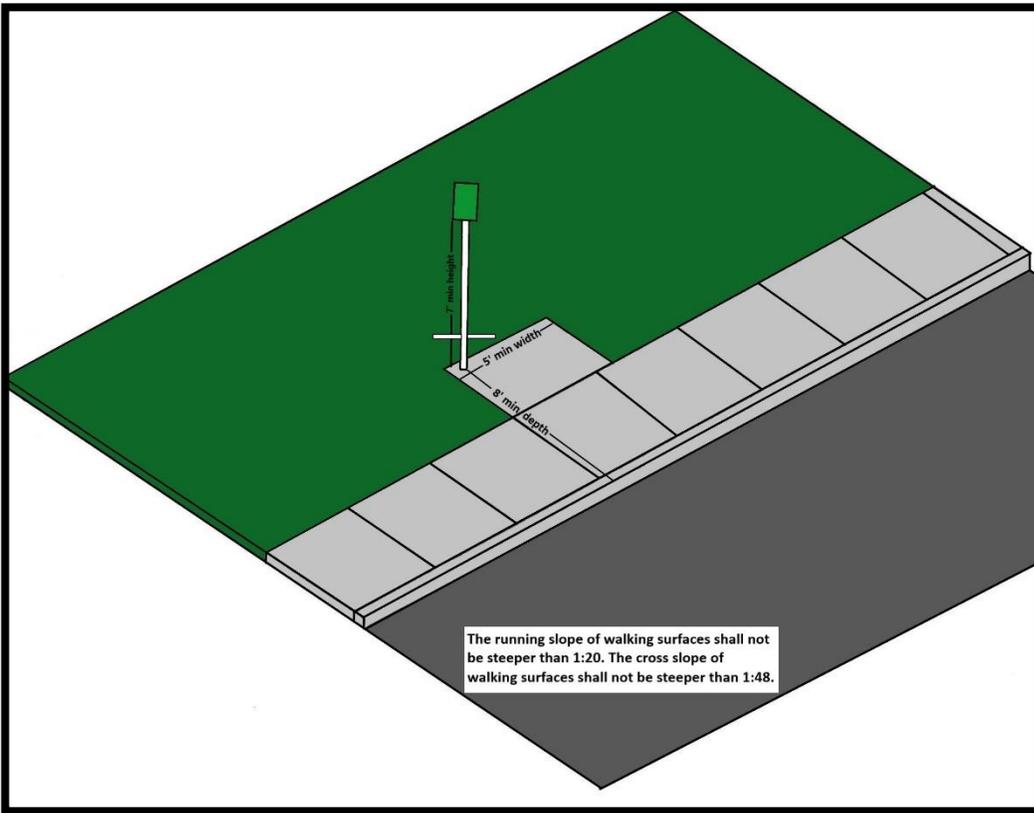
Newly installed shelters will have a minimum of one open section measuring at least 32 inches wide for a mobility device to park fully within the shelter. Concrete pads poured for a shelter will be no less than 8 feet deep and 15 feet wide. The combination of this depth and the sidewalk the shelter pad is connected to must leave a clear path and landing pad of no less than 8 feet deep and 5 feet wide to allow a person using a mobility device to board the bus.

Shelter Stop with a Parking Strip

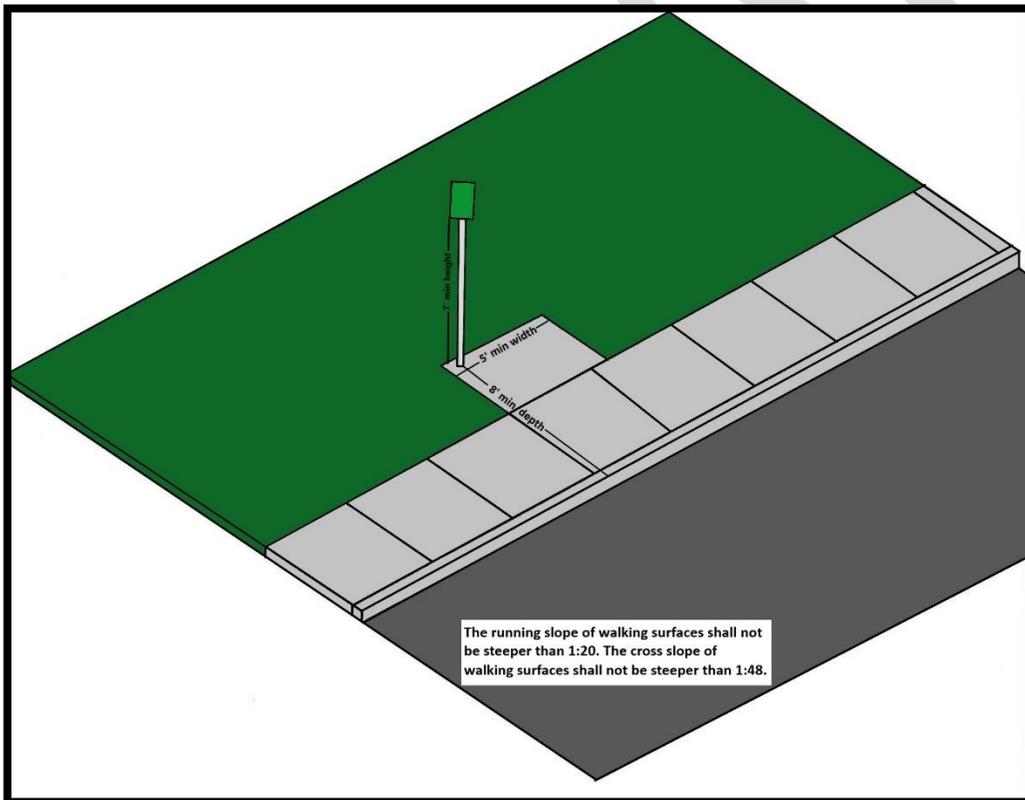


Existing landscaping may impact the layout for a stop. There must still be a connection from the sidewalk to the curb, to allow for safe boarding of a bus. The concrete pad poured to make this path must be at least 5 feet wide. The sidewalk may be included in the calculation of 8-foot depth so long as there is no obstruction within that space.

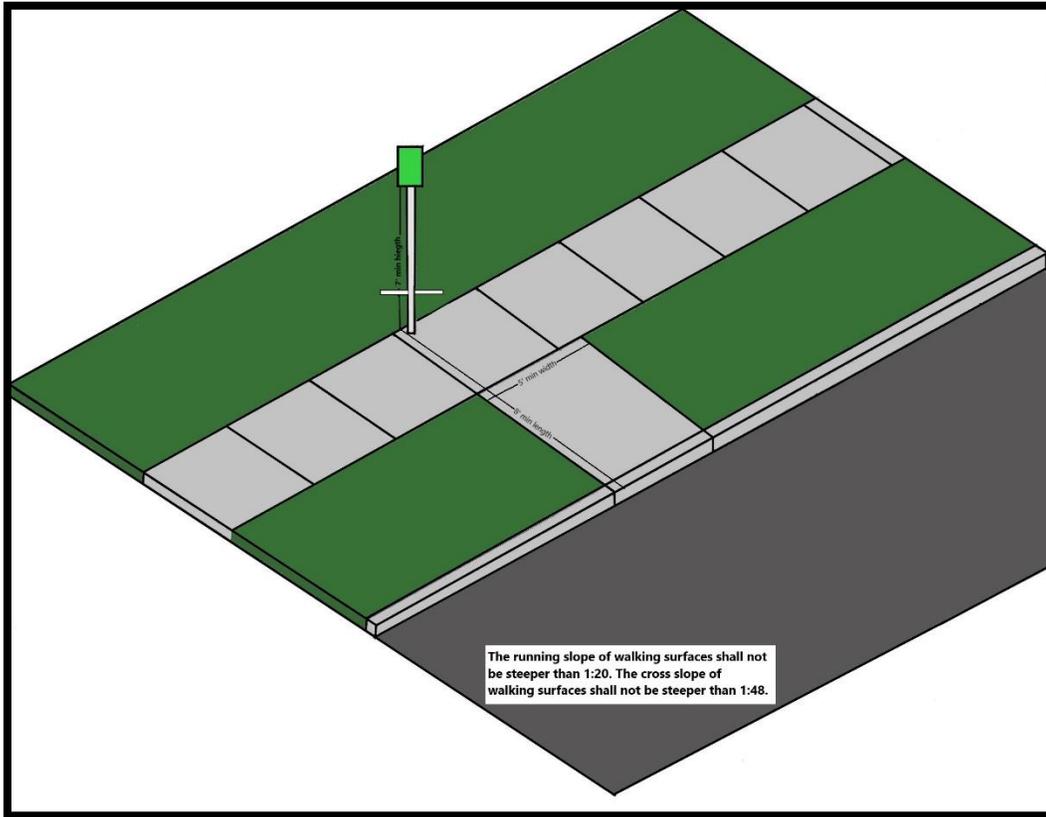
Simme Seat Stop and Signed Stop Standard



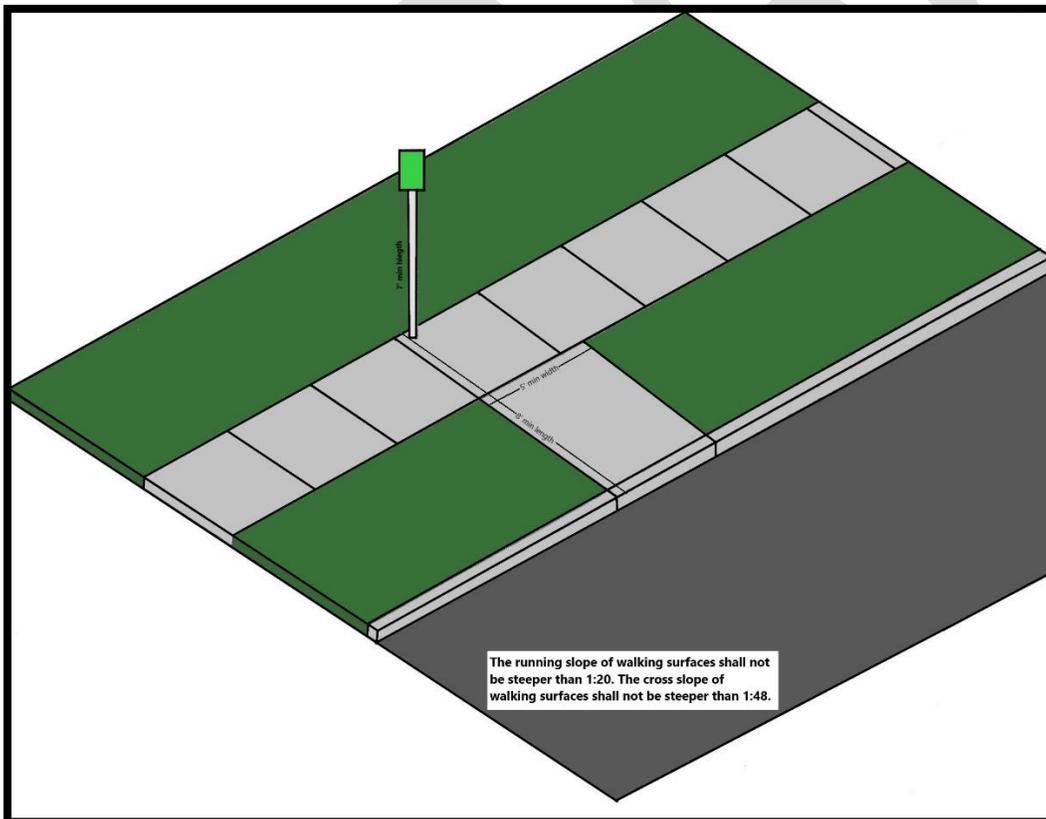
A Simme Seat only differs from a traditional sign stop due to the seating attached to the sign pole. These seats must be installed in a way that still allows a mobility device to travel around them. Newly installed Simme Seats will have a default installation location at the back of the concrete pad to place the full 5' x 8' pad in front of the signage and seating. New stops with signs only will follow the same rules. Neither stop type will be newly placed in an area that does not allow for full ADA compliance.



Simme Seat Stop and Signed Stop with a Parking Strip



Existing landscaping may impact the layout for a stop. There must still be a connection from the sidewalk to the curb, to allow for safe boarding of a bus. The concrete pad poured to make this path must be at least 5 feet wide. The sidewalk may be included in the calculation of 8-foot depth so long as there is no obstruction within that space.



Appendix B: Bus Stop Amenity Reference Guide

The following section highlights the recommended changes for the amenities section of the 2023 Title VI update.

Amenities

Valley Transit maintains a transfer center/service hub at Market Station, located at 108 West Main Street, Walla Walla, Washington. This facility has resting areas for passengers as well as staff, public restrooms, a staffed information window, digital real-time route tracking signage, parking spaces nearby, and security staff on-site. There are four bus shelters located on the island where Fixed Route buses stop, and one bus shelter on the corner of the property facing Main Street for passengers using intercity bus services offered by partnering providers.

Valley Transit will plan for bus stops to be placed near intersections, significant passenger generators, and transfer points (subject to minimum spacing criteria). The spacing of bus stops should not be less than at least two blocks between stops in highly developed areas, and four blocks in underdeveloped areas (specific major trip generators may require a variance in stop spacing). Currently, Valley Transit is in the process of correcting spacing issues by relocating or removing some stops that are closer together than the minimum distance standard (at least two blocks), that do not have a rider generator that justifies the decrease in service timeliness by closely grouped stops. However, largely the system is compliant with its minimum spacing guidelines.

Valley Transit continues to provide flag stops at this time, where the driver determines it is safe to board or de-board passengers. This is not allowed in the downtown corridor due to safety concerns. Historically, these flag stops have been listed on www.iTransitNW.com, creating some confusion for the passenger as to how flag stops work, and if there will be a bus stop sign at the location posted online. As part of a route redesign project scheduled to be completed and launch in January 2023, all flag stops will be removed from the website. The practice of flagging the bus down along the route to board in between regular stops will still be permissible so long as there is a safe place for the driver to stop for the passenger, and the bus is not in the downtown business district.

Where appropriate in urban areas, Valley Transit provides various amenities such as passenger information kiosks, benches, and litter receptacles. These are guidelines for desired levels of service to generate such amenities but may be modified to reflect the operating budget, and the bandwidth to enable these expenditures. The criteria for distribution are determined through the following:

- Approval of Department of Environmental Quality (DEQ) Categorical Exclusion process
- Adequate space for full accessibility
- Ride demand volume
- Passenger requests
- Staff recommendations
- Public comment process
- Site availability and right-of-way partnerships
- Budgetary restrictions

For future amenity additions/constructions, placement review will include (without being limited to):

Bus Stop Passenger Shelters

- Established history of passenger stops generating no less than an average of 250 rides per month
- Adequate space for full accessibility
- Proximity to communities with congregate housing, such as senior residences or higher education facilities
- Proximity to large ride generators such as shopping outlets
- Unique exposure to inclement weather
- Terminals and transfer points

Bus Stop Passenger Benches

- Established history of passenger stops generating no less than an average of 125 rides per month
 - Where space allows, Valley Transit seeks to put Simme seat signs at new locations to make them more accessible without any established ridership numbers available yet
- Adequate space for full accessibility
- Proximity to communities with high populations of elderly individuals or people with disabilities
- Proximity to large ride generators such as shopping outlets

Passenger Information Kiosks

- Proximity to passenger stops with an established history of no less than an average of 1000 rides per month
 - Valley Transit will consider kiosks for stops with a lower threshold if the stop in question has a high percent of ridership compared to others on the route, and the nearest stop with a kiosk is more than 10 blocks away
- Terminals and transfer points

Litter Receptacles

- To be placed at stops with a shelter or waiting areas that historically generate unusually high volumes of litter
 - In an effort to be a good partner, Valley Transit will seek to place a litter receptacle at any bus stop in front of a business or residence where the owner has requested one be placed, there are no ordinances preventing the placement, and Valley Transit has a receptacle available for placement

Lighting

- Valley Transit will consider the installation of safety lighting at bus stops in poorly lit areas, or areas where visibility of passengers from the bus may be difficult.
 - Valley Transit will work with property owners, the city, or the county to provide improved lighting that is not disruptive to the surrounding properties

Valley Transit will endeavor to ensure any development around major stops follows transit-supportive design principles – closer to the street, favoring pedestrian connections, meeting all ADA requirements, and customer-friendly amenities in commercial areas.

When placing a bus stop near an intersection, it should be located in the safest position, considering traffic and street conditions, with far-side stops being preferred. Where possible, stops should be located close to signalized intersections. Pullouts should be considered for stops near major trip generators, transfer points, timing points, or anywhere else a bus is likely to have an extended stop time. Additional considerations must be made to adhere to local jurisdiction line-of-sight requirements at the time of the bus stop installation.

Valley Transit will work with local jurisdictions to ensure that the area around a transit stop is fully accessible to people with disabilities, including those who use mobility aids. While existing stops may be listed by ‘as accessible as feasible’ based on the geographic challenges of their position, no new stop will be placed that cannot meet ADA requirements due to geographic challenges.

Valley Transit will seek to place bus terminals and minor turnaround facilities at transit nodes identified as being at the beginning or end of a route, where local services such as shuttles connect, and/or the convergence of two or more routes that are not interlined. Development around the stations and terminals should incorporate into transit-oriented development uses and design principles.

Appendix C: Bus Stop Service Standards

The following section outlines the recommended changes for the Valley Transit Service Standards, specifically bus stop spacing. This update should be completed alongside the Title VI update scheduled for 2023.

Bus Stop Spacing

The location of bus stops along transit routes is a balancing act of passenger convenience against the speed of operation. A stop at every intersection would provide the shortest walking distance to a bus stop, but vehicle speed and trip time for patrons on the bus would be significantly reduced by this spacing method. Aside from pure spacing considerations, stops should also be located to optimize convenience for concentrations of patrons along a route.

In general service areas, stop spacing should not be closer than two city blocks. Stop spacing in undeveloped areas, low-density areas, or on special limited routes does not require strict fixing criteria, but as a general rule should not be closer than four blocks or 1500 feet in areas without traditional block-style infrastructure. In these cases, vehicles can also stop when hailed by a patron as soon as safety and practicality allow. In commercial or industrial areas, the number and location of bus stops should be controlled by when there is a concentration of patrons.

Bus stops should be located at street intersections where possible so passengers are provided with safe access to the bus, buses do not block cross-traffic, and buses can re-enter the traffic stream with minimal conflict. In most instances, these requirements will dictate the use of stops located so that the transit vehicle stops after crossing the intersection, also known as a far-side bus stop. This standard is to be followed except where traffic conditions may make a near-side stop the more practical and safer option.

The curb area devoted to a bus stop, particularly in heavily traveled corridors, and where large numbers of passengers board daily is of critical importance. The objective must be to promote optimum safety for the boarding or alighting passengers, and also to promote the maximum speed of the transit vehicle without seriously affecting the flow of other vehicles.

For optimum safety, the length of the bus stop should allow the operator to pull both doors of the bus to the curb. For the safety of pedestrians and other vehicles, the near-side bus stop should allow adequate setback from a crosswalk to facilitate vehicular right turn movements and a clear line-of-sight and walkway for pedestrians. Additional considerations must be made to adhere to local jurisdiction line-of-sight requirements. For far-side stops, the length of the stop must be adequate for the vehicle to clear the intersection entirely and yet give adequate space ahead of the bus to allow it to re-enter traffic without excessive maneuvering by the operator.

The Institute of Traffic Engineers has established a recommended practice for bus stop locations of a distance of one hundred and five (105) feet between the front of the stopped bus and the front of a preceding parking stall for near-side stops. A distance of eighty (80) feet was measured from the rear of the bus to the first parking stall for far-side stops. A length of one hundred and thirty-five (135) feet for one bus, mid-block stop, should be standard, allowing forty-five (45) feet forward and sixty (60) feet to the rear of space between additional parking stalls. Additionally, the Federal Transit Administration recommends that neither end of a bus stop come within five (5) feet of a crosswalk.

Appendix D: Maximum Extent Feasible Criteria

In some cases, it would not be cost-effective, or Valley Transit may not have the authority, to improve existing bus stops in the near future due to the following circumstances:

- Lack of pedestrian connectivity (e.g.; sidewalks, curb ramps);
- Limited right-of-way;
- Physical barriers such as ditches, berms, retaining walls, other landscaping utilities, etc.;
- Located on or near a steep incline/decline;
- Capital costs for improvement do not fit within the budget or would constitute more than 20% of the overall project cost.

As noted through the plan, Valley Transit will seek to meet all ADA requirements to the extent that construction specifications are within the control of Valley Transit. In locations where Valley Transit does not own the right-of-way, but another entity does, Valley Transit will make every attempt to work with the other party on an easement to bring the bus stop in question into compliance. If the other party is not amenable, a record will be made detailing why the bus stop is considered as accessible as is feasible, and this information (including the current owner) will be included in future stop assessments in case the circumstances change and the accessibility of the stop can be addressed at a later date.

The requirement to re-address any stop classified in this way will be triggered by any qualifying alteration. Per the ADA:

“For the purposes of this part, an alteration is a change to a place of public accommodation or a commercial facility that affects or could affect the usability of the building or facility or any part thereof.

- (1) Alterations include, but are not limited to, remodeling, renovation, rehabilitation, reconstruction, historic restoration, changes or rearrangement in structural parts or elements, and changes or rearrangement in the plan configuration of walls and full-height partitions. Normal maintenance, reroofing, painting or wallpapering, asbestos removal, or changes to mechanical and electrical systems are not alterations unless they affect the usability of the building or facility.*
- (2) If existing elements, spaces, or common areas are altered, then each such altered element, space, or area shall comply with the applicable provisions of appendix a of this part (36.402)*

Appendix E: Public Outreach Participants

Public and stakeholder input is essential to creating a robust transition plan. ADA implementation regulations require public entities to provide an opportunity to interested persons, including individuals with disabilities, to participate in this evaluation and transition process. The following outreach methods were used by Valley Transit, a community survey was also used for this project. Where possible the names of attendees are listed in gratitude for the effort given and knowledge shared by all parties involved.

Public Meetings:

- Walla Walla Community Service Council (WWCSC) meeting
- Walla Walla County Accessible Communities Advisory Committee (ACAC) meeting
- Walla Walla Bicycle and Pedestrian Advisory Committee (BPAC) meeting
- Valley Transit Board Meetings
- Walla Walla Noon Rotary meeting
- Walla Walla Valley Blue Zones Project Built Environment Policy Committee Meeting
- , and this will be updated with public meeting attendees leading up to the final presentation to the Valley Transit Board

Participants (listed by the event if title/information was not provided):

- Adam Klein – City of Walla Walla
- Andrea Weckmueller-Behringer – WWVMPO
- Becky Kettner – Baker Boyer Bank/Rotary Member
- Belen Cardenas – BMAC
- Bill Erickson – Rotary Member
- Bob Alexander – Rotary Member
- Bob McCoy – Rotary Member
- Bruce Bond – Rotary Member
- Charlie DeSalvo – Rotary Member
- Chris Coats – Marcus Whitman Hotel/Rotary Member
- Chris Parsons – Valley Transit Employee
- Connie Taylor-Randall – ACAC
- Courtney Needham – BMAC
- Cynthia Wolski – ACAC
- Dan Calzaretta – BPAC
- David Hull – Coldwell Banker Walla Walla/Rotary Member
- David Irion – Rotary Member
- Doug Logan – Blue Zones Project
- Douglas Bayne – Rotary Member
- Elaine Dawson – City of Walla Walla
- Elizabeth Chamberlain – City of Walla Walla/Rotary Member
- Eloise – National Alliance for Mental Illness
- Emily Brown – Blue Zones Project
- Emily Bushnell – BPAC
- Erendira Cruz – BPAC
- Ernest Campbell – Rotary Member
- Greg Lutcher – Attorney
- Gregory Jones – Travel Leaders/Rotary Member
- James Hayner – Attorney/Rotary Member
- James Hobkirk – Associated Veterinary Medical Center/Rotary Member
- Jan Corn – Rotary Member
- Jeanne Salyer – Valley Transit Employee
- Jennifer Mayberry – County Commissioner
- Jerry Cummins – Rotary Member
- Jim Fry – College Place Public Schools/Rotary Member
- John Blair – Dunham Cellars/Rotary Member
- John Cress – Rotary Member
- Josh Friedman – Valley Transit Employee
- Joshua Hepler End – ACAC
- Kathy Trommald – Rotary Member
- Kelly Black – Blue Zones Project
- Ki Bealey – City of Walla Walla
- Kimberly Powell – Attorney
- Larry Frank – Rotary Member
- Leslie Stahlnecker – ESD 123
- Linc Nesheim – BPAC
- Liz Fraser – Blue Mountain Heart-to-Heart
- Margaret Buchan – Rotary Member
- Mark Brotherton – Valley Transit Employee
- Maryann Cole – Rotary Member
- Meghan DeBolt – Blue Zones Project
- Michael Gillespie – Physician/Rotary Member
- Michelle Goodwin – BMAC
- Mike Denny – Fort Walla Walla Museum
- Mitchell Powers – BPAC
- Nancy McDuff – BPAC
- Norma Hernandez – Mayor of College Place

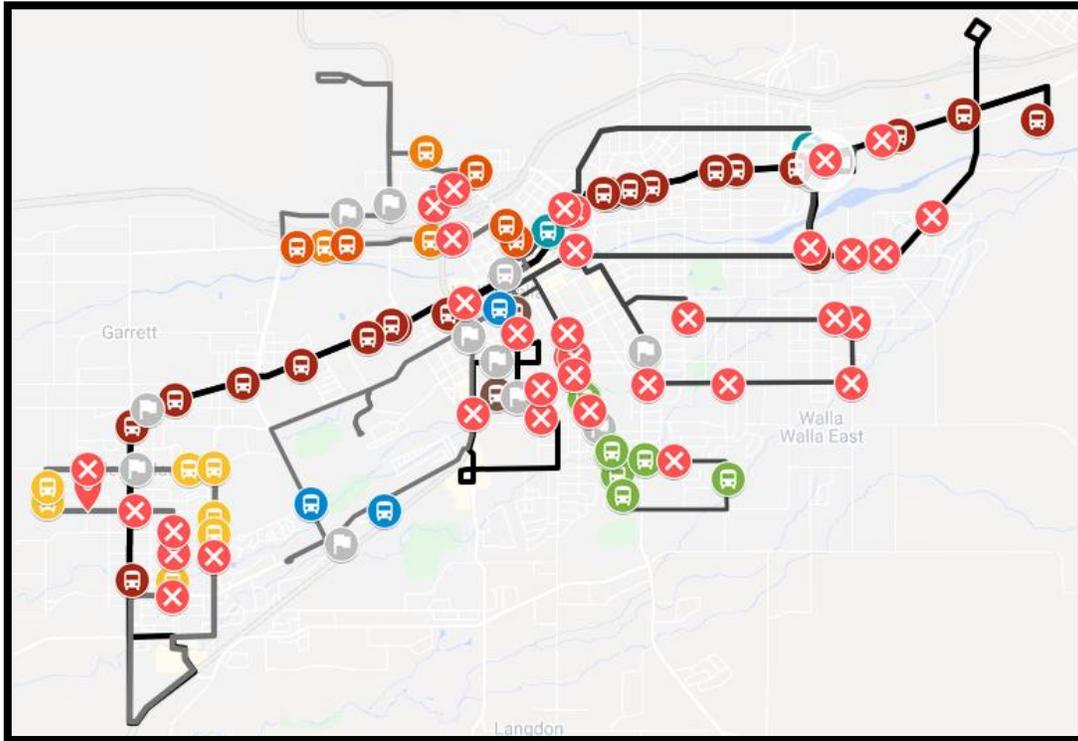
- Pam Cress – Walla Walla University/Rotary Member
 - Rachel Elfenbein – Community Council
 - Randall Son – Valley Transit Employee
 - Rhonda Gould – Walla Walla Rural Public Library District
 - Richard Gilliland – Rotary Member
 - Sam Wells – Financial Advisor/Rotary Member
 - Sara Archer – Blue Mountain Humane Society/Rotary Member
 - Selene Marsh – Rotary Member
 - Shelby Gordon – BMAC
 - Skip Cundiff – Falkenberg’s Jewelers/Rotary Member
 - Tony Ichsán – Whitman College
 - Stanley Green – Walla Walla 2020
 - Steve Stevens – Rotary Member
 - Steve Moss – City Councilor
 - Steven VanAusdle – Walla Walla Community College/Rotary Member
 - Sue Thompson – Physician/Rotary Member
 - Susan Nakonieczny – City Councilor
 - Tammi – BMAC
 - Tim Barrett – WWVMPPO
 - Todd Kimball – County Commissioner
 - Tom Nollette – Amalgamated Transit Union
 - Tom Osborn – Mechanical Engineer/Rotary Member
- Final plan review public meeting attendees

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Appendix F: Visual Representation of Planned Changes

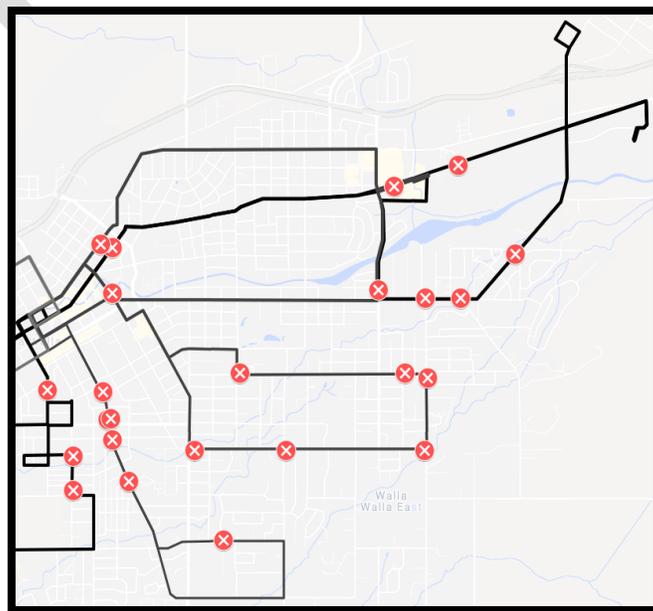
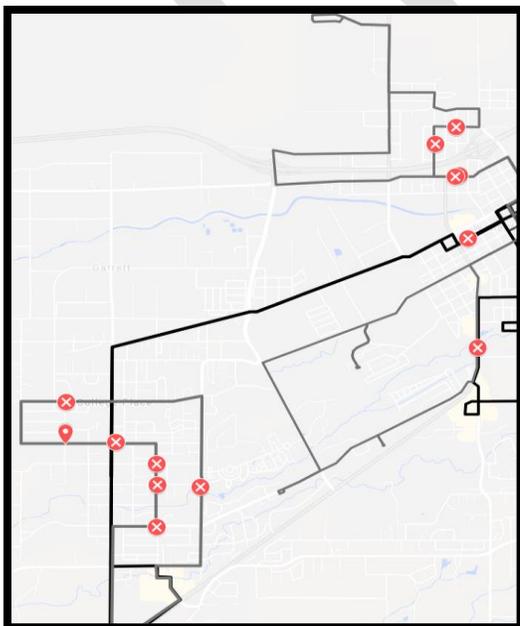
Full System Changes At-A-Glance

This map does not include stops that are currently ADA compliant and will not need any changes made.



Flag Stop Removal

These stops will no longer be listed on www.iTransitNW.com after route updates, scheduled to begin in January of 2023, but the practice of allowing flag stops will remain. Any of these locations that will no longer be considered a designated stop would still be eligible for a passenger to flag the bus down in route for a ride.



Bus Stops with Adjustments Planned

Light grey icons with flags on them are highlighting locations that currently exist as a flag stop but will be converted to a traditional bus stop with a sign. This sign will include education on how flag stops work, and there will be at least one per route. The bus icons are color-coded by the route the stop is on, and include stops that will need concrete work done, minor relocations to safer positions, or in six instances highlight a bus stop that will be taken out of service for safety and low ridership concerns.

