



CITY OF
TUCSON

DEPARTMENT OF
TRANSPORTATION

February 10, 2012

Mr. Peter M. Rogoff, Administrator -
Federal Transit Administration
1200 New Jersey Ave., SE, Room E54-427
Washington, DC 20590

Dear Mr. Rogoff:

The City of Tucson Department of Transportation in cooperation with the Regional Transportation Authority is submitting two applications for the determination of equivalent facilitation related to the implementation of the Tucson Modern Streetcar (TMS) project. The first request is for a modified detectable warning area interface with the modern streetcar vehicle bridge plates at stop platforms. The second request is to utilize full door width bridge plates without side barriers for our new low floor modern streetcars.

The TMS project includes the design and construction of a 3.82 route mile (6.77 track miles) modern streetcar line that will connect many of the City of Tucson's major centers, including downtown Tucson, the redevelopment area west of downtown, the Fourth Avenue and Main Gate business districts, the University of Arizona (UA), and the Arizona Health Sciences Center. The project will construct 17 new accessible stop/stop pair platforms along the alignment.

The TMS project team believes these modifications provide for system wide accessibility and for passengers with mobility aids, and does not significantly affect the ability of the detectable warning area to warn visually impaired people of the hazards such as the platform edge bordering the drop-off to the street level trackbed. Similar equivalent facilitations have been granted for other rail transit systems, and have been found to be operating successfully and safely for many years. In order to gain insight on successfully operating accessible rail transit systems, the TMS team reached out to San Diego's MTS and Portland's TriMet to learn from their experiences. Based on these discussions the TMS team incorporated the following design features as part of our new system.

- Modern streetcars vehicles with low floors to allow level boarding
- Bridgeplates for level boarding that are the full door width (46")
- Shallow stop platforms that are 9.5 inches above the track

These features were coordinated throughout the design with the City of Tucson's Commission on Disability Issues (CODI) and a Technical Advisory Committee. Additionally, the TMS team met with CODI, the Southern Arizona Association for the Visually Impaired (SAAVI), and the University of Arizona's Disability Resource Center to review the proposed equivalent facilitations. Positive comments were received from each of these groups and they provided letters of support for these requests. In addition, the TMS team held a public hearing on January 10, 2012 to



February 10, 2012
Mr. Peter M. Rogoff, Administrator
Page 2

take comments on the draft equivalent facilitation requests. Public notice for the hearing was provided and allowed for public comment on the equivalent facilitations from December 27, 2011 through January 27, 2012. Only one comment was received at the public hearing which supported the proposed equivalent facilitations. No additional public comments were received.

Attached are two detailed reports supporting the requests for equivalent facilitation which also document the public process. The TMS team believes that the proposed equivalent facilitations will provide a substantially equivalent or greater access to the usability of the Tucson Modern Streetcar system. Therefore, the City of Tucson Department of Transportation in cooperation with the Regional Transportation Authority request the FTA's concurrence with and approval of the use of a modified detectable warning area and the full door width bridge plate without side rails for the Tucson Modern Streetcar system, and that the FTA approve our Request for Equivalent Facilitation pursuant to 49 C.F.R. § 37.7(b)(5).

Should you have any questions or need additional information, please contact me at 520-791-4371.

Sincerely,



Antonio C. Paez, P.E., R.L.S., Interim Director
Department of Transportation

ACP:mc

Attachments

cc: Leslie Rogers, FTA Region IX Administrator
Linda Ford, FTA Acting Director of Civil Rights
Shellie Ginn, TMS Project Manager