

February 24, 2023

Secretary Craig Thompson  
Wisconsin Department of Transportation  
4822 Madison Yards Way, S903  
Madison, WI 53705  
Sent via email: [Craig.Thompson@Wisconsin.gov](mailto:Craig.Thompson@Wisconsin.gov)

Re: Comments on Wisconsin Rail Plan 2050

Dear Secretary Thompson;

Thank you for the opportunity to provide public comments on the Wisconsin Rail Plan 2050 (WRP 2050). These comments are submitted by Disability Rights Wisconsin (DRW) in its capacity as the Protection and Advocacy system for people with disabilities in Wisconsin.

For some time DRW has been concerned by the documented lack of accessibility at several train stations in Wisconsin and believes that the proposed Wisconsin Rail Plan 2050 statements regarding accessibility are not strong enough to guarantee improved accessibility over the course of the Plan. DRW requests that the Plan be amended to expressly direct that these stations be brought into compliance with the standards set forth in the Americans with Disabilities Act (ADA).

### **Continued ADA-deficiencies at Wisconsin train stations**

As Wisconsin's Protection and Advocacy system, DRW frequently hears from Wisconsin residents who encounter accessibility issues related to transportation. Many of these complaints involve the inaccessibility of the services themselves. Inaccessible transportation has consequences that go far beyond the immediate problem, creating barriers to employment and healthcare, and isolating people with disabilities from their communities.

Signed into law in 1990, the Americans with Disabilities Act (ADA) set forth minimum standards for accessibility needed to provide equal access and opportunities for people with disabilities. Now, thirty-three years later, the ADA-deficient stations listed in the Plan continue to fall short of these minimum requirements.

As the 2050 Plan recognizes, each intercity passenger rail station is required to be accessible to, and usable by, people with disabilities. (See WRP 2050 6-1, p. 170). Minimally, this requires that the stations come into compliance with the applicable federal requirements under the Americans with Disabilities Act (ADA). However, as the Plan acknowledges, a number of stations in Wisconsin remain out of compliance with the ADA. (See Table 6-2: Details of Wisconsin Intercity Passenger Stations). Specifically, the Columbus, Portage, Wisconsin Dells, and La Crosse stations are not in compliance with ADA standards. In Columbus, there is only one accessible parking stall,

and the caretaker office window is not accessible. In Portage, there are not accessible restrooms, ticket office, or waiting rooms. The Wisconsin Dells station also has no accessible waiting room, and in La Crosse, the ticket office is not accessible. Most of the responsibility for these deficiencies appears to lie with Amtrak (See Table 6-1: Responsibility for Wisconsin Station ADA Elements), except for the Wisconsin Dells station structures which is owned by the City of Wisconsin Dells. (*Id.*)

These deficiencies render WisDOT's services to individuals with disabilities partially or completely unavailable. While ADA compliance is only the minimum requirement and does not completely ensure accessibility on its own, individuals with disabilities rightfully expect that government services comply with federal standards.

### **WisDOT measures to address inaccessibility at ADA-deficient stations**

DRW appreciates the statements made in the Wisconsin Rail Plan 2050 that support accessibility regardless of ownership of passenger rail stations. (See 9-68 "Passenger Rail Station ADA Improvements," p. 318). DRW further appreciates that the two WisDOT passenger rail stations, the Milwaukee Airport Rail Station and Milwaukee Intermodal Station, seem to comply with ADA standards.

The proposed Plan does add some funding for improvements to passenger, intercity bus, and commuter rail stations as well as funding for a passenger and commuter rail study program. The 2050 Plan also mentions the existence of the \$1.75 billion "All Stations Accessibility Program" which provides Federal grant money to upgrade the accessibility of existing rail fixed guideway public transportation systems, such as commuter rail stations, for people with disabilities. (12-10, p. 364).

Given the resources available to WisDOT to bring all Wisconsin stations into compliance and given the noted continued lack of accessibility at several Wisconsin stations, DRW urges WisDOT to take a more active role to assure that the needed updates are made over the course of the 2050 Plan.

DRW supports WisDOT's efforts to improve accessibility and hopes we can continue to collaborate with you on ways to improve the accessibility of services going forward. Wisconsin residents with disabilities have already been waiting over 30 years for equal access to rail transportation, and we look forward to a Wisconsin Rail Plan 2050 that will fulfill that promise.

Respectfully submitted,

Kristin Kerschensteiner  
Director of Legal and Advocacy Services