City of Port Orange

ADA Self-Evaluation & Transition Plan

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Abbreviations

ADA – Americans with Disabilities Act
ADAAG – Americans with Disabilities Act Accessibility Guidelines
CFR – Code of Federal Regulations
CIP – Capital Improvement Projects
DOJ – United States Department of Justice
FHWA – Federal Highway Administration
MUTCD – Manual on Uniform Traffic Control Devices
PROWAG – Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way
PSA – Program, Services, and Activities
SAD – 1991 Standards for Accessible Design
1.0 Purpose

The purpose of this Americans with Disabilities Act (ADA) Self-Evaluation and Transition Plan is to summarize the activities completed to-date related to ADA compliance and to create a roadmap for the City of Port Orange to update their ADA Transition Plan. Prioritization methodology for evaluating and implementing improvements was developed based on the applicable 2010 ADA Standards, Title 24 of the 2012 Florida Accessibility Code for Building Construction, 2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG), and the details are provided in this document.

This document includes an overview of the ADA and provides recommendations for the City of Port Orange based on guidance from the Federal Highway Administration (FHWA) and U.S. Department of Justice (DOJ) to improve accessibility for the public.
2.0 Introduction

2.1 Legislative Mandate

The Americans with Disabilities Act (ADA) is a civil rights law that mandates equal opportunity for individuals with disabilities. The ADA prohibits discrimination in access to jobs, public accommodations, government services, public transportation, and telecommunications. Title II of the ADA also requires that all programs, services, and activities (PSAs) of public entities provide equal access for individuals with disabilities.

The City of Port Orange will undertake a comprehensive evaluation of its PSAs and facilities to determine the extent that individuals with disabilities may be restricted in their access.

2.2 ADA Self-Evaluation and Transition Plan Development Requirements and Process

The City of Port Orange is obligated to observe all requirements of Title I in its employment practices; Title II in its policies, programs, and services; any parts of Titles IV and V that apply to the City and its programs, services, or facilities; and all requirements specified in the 2010 ADA Standards and 2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG) that apply to facilities and other physical holdings.

Title II has the broadest impact on the City. Included in Title II are administrative requirements for all government entities employing more than 50 people. These administrative requirements are:

- Completion of a Self-Evaluation;
- Development of an ADA complaint procedure;
- Designation of at least one (1) person who is responsible for overseeing Title II compliance; and
- Development of a Transition Plan to schedule the removal of the barriers uncovered by the Self-Evaluation process. The Transition Plan will become a working document until all barriers have been addressed.

This document describes the process developed to complete the evaluation of the City of Port Orange’s PSAs and facilities, provides possible solutions to remove programmatic barriers, and presents a Transition Plan for the modification of facilities and public rights-of-way to improve accessibility, which will guide the planning and implementation of necessary program and facility modifications over the next ten (10) years. The ADA Self-Evaluation and Transition Plan is significant in that it establishes the City’s ongoing commitment to the development and maintenance of programs, services, activities, and facilities that accommodate all its citizenry.

2.3 Discrimination and Accessibility

Program accessibility means that, when viewed in its entirety, each program is readily accessible to and usable by individuals with disabilities. Program accessibility is necessary not only for individuals with mobility needs, but also for individuals with sensory and cognitive disabilities.

Accessibility applies to all aspects of a program or service, including but not limited to physical access, advertisement, orientation, eligibility, participation, testing or evaluation, provision of auxiliary aids, transportation, policies, and communication.
The following are examples of elements that should be evaluated for barriers to accessibility:

2.3.1 Physical Barriers
- Parking
- Path of travel to, throughout, and between buildings and amenities
- Doors
- Service counters
- Restrooms
- Drinking fountains
- Public telephones
- Path of travel along sidewalk corridors within the public rights-of-way
- Access to pedestrian equipment at signalized intersections

2.3.2 Programmatic Barriers
- Building signage
- Customer communication and interaction
- Non-compliant sidewalks or curb ramps
- Emergency notifications, alarms, and visible signals
- Participation opportunities for City sponsored events

2.3.3 Ongoing Accessibility Improvements
City PSAs and facilities evaluated during the Self-Evaluation will continue to be evaluated on an ongoing basis, and the ADA Transition Plan will be revised to account for changes that have been or will be completed since the initial Self-Evaluation. This Plan will be posted on the City’s website for review and consideration by the public.

2.3.4 City of Port Orange Approach
The purpose of the Transition Plan is to provide the framework for achieving equal access to the City of Port Orange’s programs, services, and activities within a reasonable timeframe. The City’s elected officials and staff believe that accommodating persons with disabilities is essential to good customer service, ensures the quality of life Port Orange residents seek to enjoy, and guides future improvements.

The City of Port Orange should make reasonable modifications in PSAs when the modifications are necessary to avoid discrimination based on disability, unless the City can demonstrate that making the modifications will fundamentally alter the nature of the program, service, or activity. The City of Port Orange will not place surcharges on individuals with disabilities to cover the cost involved in making PSAs accessible.

2.4 Exceptions and Exemptions
A municipality is not required to take any action that would create any undue financial or administrative burden for the public entity, create a hazardous condition for other people, or threaten or destroy the historic significance of a historic property.

In determining whether an alteration would impose an undue financial or administrative burden on a covered entity, factors to be considered include: (i) the nature and cost of the alteration needed under this chapter; (ii) the overall financial resources of the facility or facilities involved in the provision of the reasonable accommodation; the number of persons employed at such facility; the effect on expenses and resources, or the impact otherwise of such accommodation upon the operation of the facility; (iii) the overall financial resources of the covered entity; the overall
size of the business of a covered entity with respect to the number of its employees; the number, type, and location of its facilities; and (iv) the type of operation or operations of the covered entity, including the composition, structure, and functions of the workforce of such entity; the geographic separateness, administrative, or fiscal relationship of the facility or facilities in question to the covered entity.

In determining whether an alteration would threaten or destroy the historic significance of a historic property, the City should first confirm if the property is on the National Register of Historic Places. Based on a search of the National Register of Historic Places NPGallery Database (https://npgallery.nps.gov/nrhp) and the associated geodatabase (https://irma.nps.gov/DataStore/Reference/Profile/2210280), there are four (4) historic sites/districts within the City, including Dunlawton Plantation Sugar Mill Ruins, Dunlawton Avenue Historic District, Gamble Place Historic District, and Spruce Creek Mound Complex. Based on the City of Port Orange Comprehensive Plan Update 2010, Figure 1-2, there are also several historic buildings/structures and one (1) historic roadway within the City, identified by the City on the Florida Master Site File (https://www.dos.myflorida.com/historical/preservation/master-site-file/).

A municipality is not necessarily required to make each of its existing facilities accessible to and usable by individuals with disabilities. In the event the City determines a proposed action would generate undue financial or administrative burden, create a hazardous condition for other people, or threaten or destroy the historic significance of a historic property, a municipality has a responsibility to communicate and document the decision and the methodology used to reach it. If an action would result in such an alteration or such burdens, a municipality shall take any other actions that would not result in such an alteration or such burdens but would nevertheless ensure that individuals with disabilities receive the benefits or services provided by the City.

2.5 New Construction and Alterations

If the start date for construction is on or after March 15, 2012, all newly constructed or altered state and local government facilities must comply with the 2010 ADA Standards for Accessible Design. Before that date, the 1991 Standards (without the elevator exemption), the Uniform Federal Accessibility Guidelines, or the 2010 ADA Standards may be used for such projects when the start of construction commences on or after September 15, 2010.

The most recent standard is the 2010 ADA Standards for Accessible Design, which sets the minimum requirements – both scoping and technical – for newly designed and constructed or altered state and local government facilities, public accommodations, and commercial facilities to be readily accessible to and usable by individuals with disabilities. It is effectuated from 28 CFR 35.151 and the 2004 Americans with Disabilities Act Accessibility Guidelines (ADAAG). However, the FHWA and DOJ recommend using the Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG) for designing facilities within the public rights-of-way as a best practice until it is adopted at the federal level. The Manual on Uniform Traffic Control Devices (MUTCD), which has been formally adopted by the City of Port Orange, is also incorporated by reference within PROWAG. As of November 2016, the Florida Department of Transportation (FDOT) has not officially adopted PROWAG, but according to their current ADA Coordinator, FDOT has incorporated criteria from PROWAG into the design standards and Plans Preparation Manual. It is recommended that the City of Port Orange adopt PROWAG so that it becomes an enforceable document for all City projects within the public rights-of-way, regardless of its adoption status at the state and federal level.
2010 ADA Standards for Accessible Design

The Department of Justice’s revised regulations for Titles II and III of the Americans with Disabilities Act of 1990 (ADA) were published in the Federal Register on September 15, 2010. These regulations adopted revised, enforceable accessibility standards called the 2010 ADA Standards for Accessible Design, “2010 Standards.” On March 15, 2012, compliance with the 2010 Standards was required for new construction and alterations under Titles II and III. March 15, 2012, is also the compliance date for using the 2010 Standards for program accessibility and barrier removal.

PROWAG

The U.S. Access Board is developing new guidelines for public rights-of-way that will address various issues, including access for blind pedestrians at street crossings, wheelchair access to on-street parking, and various constraints posed by space limitations, roadway design practices, slope, and terrain. The new guidelines will cover pedestrian access to sidewalks and streets, including crosswalks, curb ramps, street furnishings, pedestrian signals, parking, and other components of public rights-of-way. The Board’s aim in developing these guidelines is to ensure that access for persons with disabilities is provided wherever a pedestrian way is newly built or altered, and that the same degree of convenience, connection, and safety afforded the public generally is available to pedestrians with disabilities. Once these guidelines are adopted by the Department of Justice, they will become enforceable standards under Title II of the ADA. However, in a memorandum dated January 23, 2006 from the Federal Highway Administration, the draft PROWAG is the recommended best practice and can be considered the state of the practice that could be followed for areas not fully addressed by the 2010 ADA Standards for Accessible Design.

MUTCD

Traffic control devices shall be defined as all signs, signals, markings, and other devices used to regulate, warn, or guide traffic, placed on, over, or adjacent to a street, highway, pedestrian facility, bikeway, or private road open to public travel by authority of a public agency or official having jurisdiction, or, in the case of a private road, by authority of the private owner or private official having jurisdiction. The Manual on Uniform Traffic Control Devices is incorporated by reference in 23 Code of Federal Regulations (CFR), Part 655, Subpart F and shall be recognized as the national standard for all traffic control devices installed on any street, highway, bikeway, or private road open to public travel in accordance with 23 U.S.C. 109(d) and 402(a). The policies and procedures of the Federal Highway Administration (FHWA) to obtain basic uniformity of traffic control devices shall be as described in 23 CFR 655, Subpart F.

2.6 Maintenance Versus Alterations

The United States Department of Justice (DOJ) has issued a briefing memorandum on clarification of maintenance versus projects. Information contained in the briefing memorandum is below. We recommend this clarification regarding when curb ramp installation is required as part of a project be distributed to the appropriate City of Port Orange staff.

The Americans with Disabilities Act of 1990 (ADA) is a civil rights statute prohibiting discrimination against persons with disabilities in all aspects of life, including transportation, based on regulations promulgated by the United States Department of Justice (DOJ). DOJ’s regulations require accessible planning, design, and construction to integrate people with disabilities into mainstream society. Further, these laws require that public entities responsible for operating and maintaining the public rights-of-way do not discriminate in their programs and activities against persons with disabilities. FHWA’s ADA program implements the DOJ regulations through delegated authority to ensure that pedestrians with disabilities can use the transportation system’s pedestrian facilities in an accessible and safe manner.
FHWA and DOJ met in March 2012 and March 2013 to clarify guidance on the ADA’s requirements for constructing curb ramps on resurfacing projects. Projects deemed to be alterations must include curb ramps within the scope of the project.

This clarification provides a single Federal policy that identifies specific asphalt and concrete-pavement repair treatments that are considered to be alterations – requiring installation of curb ramps within the scope of the project – and those that are considered to be maintenance, which do not require curb ramps at the time of the improvement. Figure 1 provides a summary of the types of projects that fall within maintenance versus alterations.

This approach clearly identifies the types of structural treatments that both DOJ and FHWA agree require curb ramps (when there is a pedestrian walkway with a prepared surface for pedestrian use and a curb, elevation, or other barrier between the street and the walkway) and furthers the goal of the ADA to provide increased accessibility to the public right-of-way for persons with disabilities. This single Federal policy will provide for increased consistency and improved enforcement.

### Figure 1. Maintenance versus Alteration Projects

<table>
<thead>
<tr>
<th>ADA Maintenance</th>
<th>ADA Alterations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Crack Filling and Sealing</td>
<td>Open-graded Surface Courses</td>
</tr>
<tr>
<td>Surface Sealing</td>
<td>Cape Seals</td>
</tr>
<tr>
<td>Chip Seals</td>
<td>Mill &amp; Fill / Mill &amp; Overlay</td>
</tr>
<tr>
<td>Slurry Seals</td>
<td>Hot In-Place Recycling</td>
</tr>
<tr>
<td>Fog Seals</td>
<td>Microsurfacing/Thin Lift Overlay</td>
</tr>
<tr>
<td>Scrub Sealing</td>
<td>Addition of New Layer of Asphalt</td>
</tr>
<tr>
<td>Joint Crack Seals</td>
<td>Asphalt and Concrete Rehabilitation and Reconstruction</td>
</tr>
<tr>
<td>Joint repairs</td>
<td>New Construction</td>
</tr>
<tr>
<td>Dowel Bar Retrofit</td>
<td>Spot High-Friction Treatments</td>
</tr>
<tr>
<td>Diamond Grinding</td>
<td>Joint Crack Seals</td>
</tr>
<tr>
<td>Pavement Patching</td>
<td>Joint repairs</td>
</tr>
</tbody>
</table>

Source: DOJ Briefing Memorandum on Maintenance versus Alteration Projects
2.7 FHWA Guidance on Closing Pedestrian Crossings

An alteration that decreases or has the effect of decreasing the accessibility of a facility below the requirements for new construction at the time of the alteration is prohibited. For example, the removal of an existing curb ramp or sidewalk (without equivalent replacement) is prohibited. However, the FHWA has indicated a crossing may be closed if an engineering study (performed by the City and not included in the scope of this Transition Plan) determines the crossing is not safe for any user. The crossing should be closed by doing the following:

- A physical barrier is required to close a crossing at an intersection. FHWA has determined that a strip of grass between the sidewalk and the curb IS acceptable as a physical barrier.
- A sign should be used to communicate the closure.

The agency wishing to close certain intersection crossings should have a reasonable and consistent policy on when to do so written in their Transition Plan or as a standalone document. If safety concerns are established by an engineering study, a pedestrian crossing should not be accommodated for any user. The City of Port Orange should also develop and implement a policy on how to close those crossings that are accommodated based on the existing conditions at the crossing location (e.g. existing sidewalk leading up to the curb in the direction of the crossing or existing curb ramp or crosswalk serving the crossing) but should not be due to safety concerns.

2.8 Existing City Programs that Implement ADA Upgrades

The City of Port Orange currently implements ADA compliant designs through the following efforts:

- The Public Works Roads & Traffic Control Division maintains the City’s 217-mile roadway system, which encompasses curb and gutter, pavement, and sidewalk maintenance, all which improve the pedestrian path of travel in the public rights-of-way and help maintain accessible routes within the City of Port Orange in an accessible condition.

- The City’s Pavement Maintenance service includes pothole repairs that eliminate disruptions in the roadway surface. Additional services include preparation and repairs of paved surfaces where required throughout the City, including when these elements intersect the pedestrian path of travel.

- The City’s Sidewalk and Curb Ramp maintenance service provides a separate, all-weather, hard surface walkway along streets for pedestrian use and contribute to their safety by separating pedestrians from vehicular traffic. The repair and replacement of sidewalks become a necessity due to intruding underground roots, ground settlement, and aging sidewalks creating trip hazards and other unsafe conditions.
  - The City maintains approximately 550 miles of sidewalk adjacent to and within proximity of schools, parks, and community centers in the City, including sidewalk adjacent to major and collector roadways and local neighborhood streets.

- In 2017 and 2018, the City of Port Orange completed the following improvements and hosted events at their facilities related to pedestrians and accessibility:
  - 2017 Improvements
    - Gymnasium bleaches were upgraded to include handrails and a walk path
    - Riverwalk Park opened for public use
    - The City website was revamped
- POG TV streaming service allows for inclusion of closed captioning capabilities
- Hearing amplifiers were installed in the City council chambers

- **2017 Events**
  - Special Olympics Youth Basketball Games at the Gymnasium
  - Daytona Bats/Beep Ball at Spruce Creek Road Park
  - Camp T-Rec Co-sponsorship with City of Ormond Beach

- **2018 Improvements**
  - Fishing piers and drop-down railing for wheelchair access installed in Riverwalk Park
  - Sand installed at Kayak Launch area in Riverwalk park

- **2018 Events**
  - Special Olympics Track at Silver Sands
  - Special Olympics Stand Up Paddleboard at Riverwalk Park
3.0 Public Outreach

The City plans to develop an online public access survey and interactive map to provide a summary of the transition planning process and receive feedback on any concerns related to accessibility. Comments received from the survey and map will be documented and the City will continue to solicit feedback from the public on the Transition Plan.

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4.0 Self-Evaluation and Summary of Findings

The City of Port Orange’s ADA Transition Plan will include the results of a comprehensive review of the programs, services, and activities provided to employees and the public. The Plan will also include the findings from facility evaluations of all City-owned/maintained buildings and associated parking lots, parks and associated parking lots, park sidewalk and associated curb ramps, signalized intersections, and public rights-of-way sidewalks and associated curb ramps.

4.1 Programs, Services, and Activities Review

Under the ADA, the City of Port Orange is required to complete a Self-Evaluation of the City’s facilities, programs, policies, and practices. The Self-Evaluation identifies and provides possible solutions to those policies and practices that are inconsistent with Title II requirements. To be compliant, the Self-Evaluation should consider all the City’s programs, services, and activities, as well as the policies and practices the City uses to implement its various programs and services.

To comply with requirements of the plan, the City must take corrective measures to achieve program accessibility through several methods, including, but not limited to:

1) Relocation of programs to accessible facilities;
2) Modifications to existing programs so they are offered in an accessible manner;
3) Structural methods such as altering an existing facility;
4) Policy modifications to ensure nondiscrimination; and
5) Auxiliary aids needed to provide effective communication.

When choosing a method of providing program access, the City should attempt to give priority to the method that promotes inclusion among all users, including individuals with disabilities.

Programs, services, and activities offered by the City to the public must be accessible. Accessibility applies to all aspects of a program, service, or activity, including advertisement, orientation, eligibility, participation, testing or evaluation, physical access, provision of auxiliary aids, transportation, policies, and communication.

However, the City does not have to take any action that will result in a fundamental alteration in the nature of a program or activity, create a hazardous condition for other people, or result in an undue financial and/or administrative burden. This determination can only be made by the City’s ADA/504 Coordinator and/or an authorized designee of the City, such as the City Manager or his designee, and must be accompanied by a written statement detailing the reasons for reaching the determination.

The determination of undue burden must be based on an evaluation of all resources available for use. If a barrier removal action is judged unduly burdensome, the City must consider all other options for providing access that will ensure that individuals with disabilities receive the benefits and services of the program or activity. This process must be fully documented.
4.1.1 ADA/504 Coordinator (Title I / Title II)

Under the ADA Title II, when a public entity has 50 or more employees based on an entity-wide employee total count, the entity is required to designate at least one (1) qualified responsible employee to coordinate compliance with ADA requirements. The name, office address, and telephone number of this individual must be available and advertised to employees and the public. This allows for someone to assist with questions and concerns regarding disability discrimination to be easily identified.

ADA/504 Coordinator: Self-Evaluation Findings

The City of Port Orange has appointed Jamie Miller as ADA/504 Coordinator for Title I and Title II. Below is her contact information.

Jamie Miller, ADA/504 Coordinator
Administrative Services Director
1000 City Center Circle
Port Orange, FL 32129
Office: (386) 506-5562
Florida Relay: 7-1-1
jmiller@port-orange.org

A link to the ADA Coordinator contact information is posted at the bottom of the home page on the City website, as well as on the staff directory page. Additionally, the ADA Coordinator’s information can be found by searching the City website for “ADA” or “ADA Coordinator”.

ADA/504 Coordinator: Possible Solutions

This information should be prominently displayed in common areas that are accessible to all employees and areas open to the public. Also, the ADA/504 Coordinator contact information should be included in materials that are distributed from the City as part of the public notice under the ADA described in Section 4.1.4. This includes posting this information on the website. More information is presented in the following section as well as Chapter 2 of the ADA best practice toolkit here: https://www.ada.gov/pca/toolkit/chap2/toolkit.htm.

4.1.2 Roles and Responsibilities of the ADA/504 Coordinator

Below is a list of qualifications for ADA Coordinators that are recommended by U.S. Department of Justice:

- Familiarity with the entity’s structures, activities, and employees;
- Knowledge of the ADA and other laws addressing the rights of people with disabilities, such as Section 504 of the Rehabilitation Act of 1973;
- Experience with people with a broad range of disabilities;
- Knowledge of various alternative formats and alternative technologies that enable individuals with disabilities to communicate, participate, and perform tasks;
- Ability to work cooperatively with local entities and people with disabilities;
- Familiarity with any local disability advocacy groups or other disability groups;
- Skills and training in negotiation and mediation; and
- Organizational and analytical skills.
Roles and Responsibilities of the ADA/504 Coordinator: Self-Evaluation Findings

No information regarding the roles and responsibilities of the ADA/504 Coordinator is provided on the City’s website or in City documents.

Roles and Responsibilities of the ADA/504 Coordinator: Possible Solutions

The City should document the roles and responsibilities of the ADA/504 Coordinator. These roles and responsibilities should be consistent with the Department of Justice’s guidance for “An Effective ADA Coordinator” (https://www.ada.gov/pca/toolkit/chap2/toolkit.htm).

4.1.3 ADA Grievance Policy, Procedure, and Form with Appeal Process for the Americans with Disabilities Act

Title I

Title I of the ADA prohibits private employers, state and local governments, employment agencies, and labor unions from discriminating against qualified individuals with disabilities in job application procedures, hiring, firing, advancement, compensation, job training, and other terms, conditions, and privileges of employment. The ADA covers employers with 15 or more employees based on an entity-wide employee total count, including state and local governments.

The purpose of the ADA grievance procedure is to provide a mechanism for the resolution of discrimination issues at the City level, rather than require the complainant to resort to resolution at the federal level.

ADA Grievance Policy, Procedure, and Form with Appeals Process for the Americans with Disabilities Act (Title I): Self-Evaluation Findings

A City of Port Orange Title VI Nondiscrimination Policy and Complaint Procedure and Title VI Compliant Form (in both English and Spanish) are available on the City’s Human Resource webpage (https://www.port-orange.org/324/Human-Resources). However, the City does not have a Title I grievance policy, procedure, or form.

ADA Grievance Policy, Procedure, and Form with Appeals Process for the Americans with Disabilities Act (Title I): Possible Solutions

The City does not have a Title I ADA grievance policy, procedure, or form with an appeals process.

ADA Grievance Policy, Procedure, and Form with Appeals Process for the Americans with Disabilities Act (Title I): Completed Actions

The City of Port Orange Title I ADA Grievance Procedure and Form were developed in December 2018. A copy of the City’s Title I Grievance Procedure and Form are provided in Appendix A and will be posted on the City’s website.

Title II

Local governments with 50 or more employees are required to adopt and publish procedures for resolving grievances in a prompt and fair manner that may arise under Title II of the ADA. Neither Title II nor its implementing regulations describe what ADA grievance procedures must include; however, the U.S. Department of Justice suggests the following:

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• A description of how and where a complaint under Title II may be filed with the government entity;
• If a written complaint is required, a statement notifying potential complainants that alternative means of filing will be available to people with disabilities who require such an alternative;
• A description of the time frames and processes to be followed by the complainant and the government entity;
• Information on how to appeal an adverse decision; and
• A statement of how long complaint files will be retained.

ADA Grievance Policy, Procedure, and Form with Appeals Process for the Americans with Disabilities Act (Title II): Self-Evaluation Findings

The City does not have a Title II ADA grievance policy, procedure, or form with an appeals process.

ADA Grievance Policy, Procedure, and Form with Appeals Process for the Americans with Disabilities Act (Title II): Possible Solutions

The City should establish a Title II ADA grievance policy, procedure, and form with an appeals process, which should be distributed to all City department heads, and copies should be posted in public spaces of public buildings and on the City’s website. The ADA grievance procedure must be available in alternative formats so that it is accessible to all people with disabilities.

ADA Grievance Policy, Procedure, and Form with Appeals Process for the Americans with Disabilities Act (Title II): Completed Actions

The City of Port Orange Title II ADA Grievance Procedure and Form were developed in December 2018. A copy of the City’s Title II Grievance Procedure and Form are provided in Appendix A and will be posted on the City’s website.

4.1.4 Public Notice Under the ADA

The ADA public notice requirement applies to all state and local governments covered by Title II, including entities with fewer than 50 employees. The target audience for the public notice includes applicants, beneficiaries, and other people interested in the entities programs, services, and activities. This notice is required to include information regarding Title II of the ADA and how it applies to the programs, services, and activities of the public entity. The Department of Justice suggests including brief statements about:

• Employment;
• Effective communication;
• Making reasonable modifications to policies and programs;
• Not placing surcharges on modifications or auxiliary aids and services; and
• Filing complaints.

Public Notice Under the ADA: Self-Evaluation Findings

The City does not have a Public Notice Under the ADA.

Public Notice Under the ADA: Possible Solutions

The City should develop a Public Notice Under the ADA that includes the DOJ required information as well as the name and contact information of the ADA/504 Coordinator. Publishing and publicizing the ADA notice is not a one-
time requirement and the City should provide the information on an ongoing basis, whenever necessary. DOJ suggestions for ways to provide notice are provided at https://www.ada.gov/pcatoolkit/chap2/toolkit.htm.

Public Notice Under the ADA: Completed Actions

A City of Port Orange Public Notice Under the ADA was developed in December 2018. A copy of the City’s Public Notice Under the ADA is provided in Appendix B and will be posted on the City’s website.

4.1.5 ADA Action Team

The ADA Action Team is comprised of representatives from each City department. These individuals work closely with the City’s ADA/504 Coordinator to resolve issues regarding the needs of their department and the programs under their management. The ADA/504 Coordinator works closely with the ADA Action Team to coordinate the implementation of plans, programs, policies, and procedures.

ADA Action Team: Self-Evaluation Findings

The City of Port Orange has established an ADA Action Team that is comprised of representatives from each City department. These representatives are tasked with serving as the ADA contact for their department and will consult with the ADA/504 Coordinator regarding all access-related issues impacting their department.

ADA Action Team: Possible Solutions

The ADA Action Team information should be publicized in common areas that are accessible to employees and areas open to the public. This includes posting this information on the City website. Each representative should be responsible for keeping a detailed log for all ADA inquiries within their department. This log should be shared with the ADA/504 Coordinator and retained for at least three (3) years and in accordance with State public retention guidelines.

4.2 Program, Services, and Activities Inventory

The City of Port Orange plans to compile a list of all City programs, services, and activities (PSAs) required to be reviewed for compliance with Title II of the ADA. The City will evaluate current status regarding ADA requirements including eligibility requirements, participation requirements, facilities used, staff training, tours, transportation, communication, notifications, public meetings, the use of contracted services, purchasing, maintenance of accessible features, and emergency procedures.

The inventory and Self-Evaluation of these PSAs will be completed in 2020 and updates to the City’s Transition Plan will be made to include findings and possible solutions for identified barriers.

4.3 Facilities Self-Evaluation Action Plan

The Federal Highway Administration (FHWA) has provided guidance on the ADA Transition Plan process in their “INFORMATION AND ACTION: ADA Transition Plan Process” memo dated November 17, 2015 (see Appendix C). While this memo specifically addresses State Departments of Transportation, FHWA also recommends this guidance for local municipalities until municipality-specific guidance is developed by FHWA. The memo includes a checklist for elements to be included in an ADA Transition Plan and other ADA requirements that agencies must fulfill.
Items included in the FHWA checklist related to the public rights-of-way are:

- **Inventory of Barriers** (identification of physical obstacles)
  - Identify intersection information, including curb ramps and other associated accessibility elements.
  - Require an Action Plan to develop an inventory of sidewalks (slopes, obstructions, protruding objects, changes in level, etc.), signals (including accessible pedestrian signals), bus stops (bus pads), buildings, parking, rest areas (tourist areas, picnic areas, visitor centers, etc.), mixed use trails, linkages to transit.
  - Discuss jurisdictional issues/responsibilities for sidewalks.

- **Schedule**
  - Show a strong commitment toward upgrading ADA elements identified in the inventory of barriers in the short-term (planned capital improvement projects).
  - Show a strong commitment over time toward prioritizing curb ramps at walkways serving entities covered by the ADA.
  - Schedule should include prioritization information, planning, and investments directed at eliminating other identified barriers over time.
  - Dedicate resources to eliminate identified ADA deficiencies.

- **Implementation Methods**
  - Describe the methods that will be used to make the facilities accessible and include the governing standard (e.g., 2010 ADA Standards, 2011 PROWAG).

The City of Port Orange plans to evaluate all City-owned and/or maintained facilities for compliance with the 2010 ADA Standards for Accessible Design, Title 24 of the 2012 Florida Accessibility Code for Building Construction, and 2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG).

### 4.4 Existing Facility Inventory

The first step in completing a Self-Evaluation Action Plan is understanding what facilities the City is responsible for maintaining and where each of these facilities is located. The existing facility inventory will include City-owned or maintained buildings, parks, and signalized intersections. The City plans to complete the existing facility inventory in 2019.

#### 4.4.1 Buildings

All buildings with public access will be evaluated for compliance with the 2010 ADA Standards for Accessible Design and Title 24 of the 2012 Florida Accessibility Code for Building Construction, including parking lots, path of travel from the parking lot to the building, access into the building, signage, drinking fountains, telephones, bathrooms, and counter heights.

If a City of Port Orange employee requests an accommodation to work at one of the buildings without public access, the City will evaluate the property at the time of the request.

City maintained buildings are listed in Table 1 and shown on a map in Appendix D.
<table>
<thead>
<tr>
<th></th>
<th>Buildings</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Adult Activity Center</td>
<td>4790 S Ridgewood Avenue, 32127</td>
</tr>
<tr>
<td>2.</td>
<td>Adult Center Annex</td>
<td>3738 Halifax Drive, 32129</td>
</tr>
<tr>
<td>3.</td>
<td>Allen Green Civic Center</td>
<td>4705 Clyde Morris Boulevard, 32129</td>
</tr>
<tr>
<td>4.</td>
<td>Arthaus Museum</td>
<td>3840 Ridgewood Avenue, 32129</td>
</tr>
<tr>
<td>5.</td>
<td>City Center Municipal Complex</td>
<td>1000 City Center Circle, 32127</td>
</tr>
<tr>
<td>6.</td>
<td>Dorothy L Hukill City Center Annex</td>
<td>1395 Dunlawton Avenue, 32127</td>
</tr>
<tr>
<td>7.</td>
<td>Fire Logistics Building</td>
<td>1395 Dunlawton Avenue, 32127</td>
</tr>
<tr>
<td>8.</td>
<td>Fire Station #71</td>
<td>4200 S. Ridgewood Avenue, 32127</td>
</tr>
<tr>
<td>9.</td>
<td>Fire Station #72</td>
<td>6027 Central Park Boulevard, 32127</td>
</tr>
<tr>
<td>10.</td>
<td>Fire Station #73</td>
<td>1090 City Center Boulevard, 32129</td>
</tr>
<tr>
<td>11.</td>
<td>Fire Station #74</td>
<td>6701 Airport Road, 32128</td>
</tr>
<tr>
<td>12.</td>
<td>Fire Station #75</td>
<td>1701 Town W Boulevard, 32128</td>
</tr>
<tr>
<td>13.</td>
<td>Golf Course at Cypress Head</td>
<td>6231 Palm Vista, 32128</td>
</tr>
<tr>
<td>14.</td>
<td>Lakeside Community Center</td>
<td>1999 City Center Circle, 32129</td>
</tr>
<tr>
<td>15.</td>
<td>Police Station</td>
<td>4545 Clyde Morris Boulevard</td>
</tr>
<tr>
<td>16.</td>
<td>Gymnasium</td>
<td>4655 City Center Circle, 32129</td>
</tr>
<tr>
<td>17.</td>
<td>Train Depot</td>
<td>415 Herbert Street, 32129</td>
</tr>
<tr>
<td>18.</td>
<td>YMCA</td>
<td>4701 City Center Parkway, 32129</td>
</tr>
<tr>
<td>19.</td>
<td>Public Works Facility</td>
<td>407 Virginia Avenue, 32127</td>
</tr>
</tbody>
</table>
4.4.2 Parks

All existing parks will be evaluated for compliance with the 2010 ADA Standards for Accessible Design and Title 24 of the 2012 Florida Accessibility Code for Building Construction, including parking lots, path of travel from the parking lot to the park amenities, access into facilities, signage, drinking fountains and restrooms.

City maintained parks are listed in Table 2 and shown on a map in Appendix D

<table>
<thead>
<tr>
<th>Table 2. City Maintained Parks</th>
</tr>
</thead>
<tbody>
<tr>
<td>Parks</td>
</tr>
<tr>
<td>1. Airport Road Park</td>
</tr>
<tr>
<td>2. Buschman Park</td>
</tr>
<tr>
<td>3. City Center Sports Complex</td>
</tr>
<tr>
<td>4. Coraci Park</td>
</tr>
<tr>
<td>5. Creekside Middle School</td>
</tr>
<tr>
<td>6. Fredrick Street Park</td>
</tr>
<tr>
<td>7. Ken Burn Park</td>
</tr>
<tr>
<td>8. Kenneth W Park Amphitheater</td>
</tr>
<tr>
<td>9. Memorial Park</td>
</tr>
<tr>
<td>10. Causeway Park</td>
</tr>
<tr>
<td>11. Skate Park</td>
</tr>
<tr>
<td>12. Riverwalk Park</td>
</tr>
<tr>
<td>13. Russell Property</td>
</tr>
<tr>
<td>14. Seemore Dog Park</td>
</tr>
<tr>
<td>15. Silver Sands Middle School</td>
</tr>
<tr>
<td>16. Southwinds Park</td>
</tr>
<tr>
<td>17. Spruce Creek Rec Facility</td>
</tr>
<tr>
<td>18. White Place Park</td>
</tr>
<tr>
<td>19. Willow Run Park</td>
</tr>
</tbody>
</table>

4.4.3 Signalized Intersections

All City-owned or maintained signalized intersections will be evaluated for compliance with PROWAG. Signalized intersection evaluations will document the conditions and measurements along the pedestrian path of travel, which includes street crossings, curb ramps, sidewalk adjacent to the curb ramps, and pedestrian signal equipment and adjacent clear spaces.

City maintained signalized intersections are listed in Table 3 and shown on a map in Appendix D
Table 3. City Maintained Signalized Intersections

<table>
<thead>
<tr>
<th>Signalized Intersections</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Airport Road and Williamson Boulevard</td>
<td>18. Spruce Creek Road and Eastport Parkway</td>
</tr>
<tr>
<td>2. City Center Parkway and Dunlawton Avenue</td>
<td>19. Spruce Creek Road and Nova Road</td>
</tr>
<tr>
<td>3. Clyde Morris Boulevard and Dunlawton Avenue</td>
<td>20. Spruce Creek Road and Taylor Road</td>
</tr>
<tr>
<td>4. Clyde Morris Boulevard and Pines Plaza/Wal-Mart</td>
<td>21. Taylor Road and Summer Trees Road</td>
</tr>
<tr>
<td>5. Dunlawton Avenue and Nova Road</td>
<td>22. Taylor Road and Clyde Morris Boulevard</td>
</tr>
<tr>
<td>6. Herbert Street and Clyde Morris Boulevard</td>
<td>23. Taylor Road and Devon Street</td>
</tr>
<tr>
<td>7. Herbert Street and Ridgewood Avenue (US 1)</td>
<td>24. Taylor Road and Dunlawton Avenue</td>
</tr>
<tr>
<td>8. Herbert Street and Nova Road</td>
<td>25. Taylor Road and Hersel Road</td>
</tr>
<tr>
<td>9. Madeline Avenue and Clyde Morris Boulevard</td>
<td>26. Taylor Road and I-95</td>
</tr>
<tr>
<td>10. Madeline Avenue and Nova Road</td>
<td>27. Taylor Road and Williamson Boulevard</td>
</tr>
<tr>
<td>11. Peninsula Drive and Dunlawton Avenue</td>
<td>28. Village Trail and Dunlawton Avenue</td>
</tr>
<tr>
<td>12. Reed Canal Road and Clyde Morris Boulevard</td>
<td>29. Village Trail and Nova Road</td>
</tr>
<tr>
<td>13. Ridgewood Avenue and Commonwealth Boulevard</td>
<td>30. Williamson Boulevard and Madeline Avenue</td>
</tr>
<tr>
<td>14. Ridgewood Avenue and Dunlawton Avenue</td>
<td>31. Williamson Boulevard and Summer Trees Road</td>
</tr>
<tr>
<td>15. Ridgewood Avenue and Nova Road</td>
<td>32. Williamson Boulevard and Town West Boulevard</td>
</tr>
<tr>
<td>16. Spruce Creek Road and Commonwealth Boulevard</td>
<td>33. Williamson Boulevard and Willow Run Boulevard</td>
</tr>
<tr>
<td>17. Spruce Creek Road and Dunlawton Avenue</td>
<td>34. Willow Run Boulevard and Clyde Morris Boulevard</td>
</tr>
</tbody>
</table>

4.4.4 Sidewalks
City sidewalk corridors evaluations, including conditions and measurements along the pedestrian path of travel, which includes the sidewalk, curb ramps, and pedestrian crossings at driveway openings have been completed. Evaluations were conducted on 323 miles of City owned sidewalk. A map of the evaluated sidewalk corridors is provided in Appendix D.

4.4.5 Transit Stops
Transit stops serving the City of Port Orange are operated by VOLTRAN and are not included in this Transition Plan. VOLTRAN is responsible for maintaining compliance at their transit stops. Where transit stops intersect the City’s public right-of-way sidewalk network, the City and VOLTRAN should coordinate to ensure compliant transitions are maintained between adjacent paved surfaces.

4.5 Self-Evaluation Action Plan
The second step in completing a Self-Evaluation is developing an Action Plan to evaluate all existing buildings, parks, and signalized intersections based on the 2010 ADA Standards for Accessible Design, Title 24 of the 2012 Florida Accessibility Code for Building Construction, and the most recent version of PROWAG. This Action Plan will include the identification of evaluation criteria, the development of evaluation methodology and reporting output, and a schedule to complete the evaluations. Best practices for each of these items are detailed in the following sections. Once an Action Plan has been developed in 2019, the City will start the facility Self-Evaluations.
Evaluation Criteria
For each facility type, the following elements will be evaluated for consistency with 2010 ADA Standards for Accessible Design, Title 24 of the 2012 Florida Accessibility Code for Building Construction, PROWAG, and the 2009 Manual on Uniform Traffic Control Devices (MUTCD), where incorporated into PROWAG by reference.

Evaluation Methodology
Several technologies are currently available to aid in the data collection process. At a minimum, the equipment used to collect the data will be capable of the following:

- Measuring slopes to the nearest tenth of a percent;
- Measuring sidewalk, curb ramp, and crosswalk dimensions to the nearest inch;
- Measuring cross street widths, driveway widths, and sidewalk segment lengths to the nearest foot;
- Isolating the measurements for each element listed in the 2010 ADA Standards for Accessible Design, Title 24 of the 2012 Florida Accessibility Code for Building Construction, PROWAG, and the 2009 MUTCD; and
- Output should be available in GIS shapefile format with geospatially referenced photos of evaluated elements.

Reporting Capabilities
When selecting a technology to aid with data collection, the City will consider whether a reporting system has been developed to process the raw data. For the data to be readily usable by the City for developing their citywide ADA Transition Plan, the reporting system will provide the following output:

- Compliance status of each element evaluated based on the 2010 Standards for Accessible Design, Title 24 of the 2012 Florida Accessibility Code for Building Construction, and PROWAG;
- Recommended improvement to remove any barriers and bring the element into compliance;
- Estimated cost of recommended improvement; and
- Prioritization of the individual facility, independent of other locations of the same facility type.

The City will also establish a working database that will allow staff to track and monitor progress as projects are implemented and barriers are removed. The database will also allow staff to report progress by facility type on a periodic basis, which could be used in support of any mobility related performance metrics.

The progress monitoring database will incorporate existing City programs currently in place to implement ADA improvements, including:

- Bringing required elements into ADA compliance during road reconstructions and widenings;
- Bringing required elements into ADA compliance as new developments are constructed;
- Reviewing design plans for all new facilities to ensure ADA required elements are included and designed to meet the ADA standards; and
- Inspecting all new construction to ensure facilities were built per the design plans.

There is not a one size fits all solution to progress monitoring and the City will collaborate citywide to understand what existing City project information needs to be integrated with the ADA Self-Evaluation reporting data, or vice versa, to make the progress monitoring useable by City staff in maintaining the City’s ADA Transition Plan.

Reporting Capabilities: Completed Actions
The City has established a working database built around ArcGIS and Lucity software packages where information related to their maintained facilities is stored. As facility evaluations are scheduled or completed, the ADA/504
Coordinator will coordinate with the City department performing the evaluations to ensure that any outcomes are incorporated into the City's existing ArcGIS and Lucity database structure.

**Phased Self-Evaluation Approach**

The deadline set by DOJ to complete a Citywide ADA Transition Plan, including the Self-Evaluations, was January 26, 1992. Therefore, the Self-Evaluation of existing facilities should be completed as soon as practical. The DOJ does not have any requirements or guidelines on how to prioritize which facilities should be evaluated first if the City plans to phase the data collection over time. Ultimately, all facilities must be evaluated as part of an agency's Citywide ADA Transition Plan.

However, minimizing risk for litigation and risk for pedestrians should be the goal when determining the order in which to evaluate facilities. Several factors can increase risk at a location, including:

- **Number of existing complaints** – Locations with complaints identified by the public as problem areas should be evaluated as soon as possible to determine if the complaints are valid.

- **Proximity to pedestrian attractors** – Locations near pedestrian attractors (e.g., hospitals, retirement facilities, medical offices, parking garages, major employers, disability service providers, event facilities, bus or transit stop/routes, schools, government and public facilities, parks, libraries, and churches) are more likely to have a higher risk compared to those locations without pedestrian attractors.

- **Proximity to residential areas** – Locations phased near residential areas are more likely to have a higher risk than those locations adjacent to industrial areas where pedestrians are less likely to travel.

- **Number of crashes** – Locations with pedestrian-related crashes should be evaluated to determine if there is a design reason for the crashes.

- **Age of facility** – Facilities constructed after July 26, 1991 are a higher risk than those constructed before the 1991 Standards for Accessible Design (SAD) were published. The facilities constructed after July 26, 1991 were constructed out of compliance since the SAD were in place at the time of construction. Facilities constructed before July 26, 1991 are a lower risk because the SAD were not in place at the time of construction.

- **Roadway functional classification** – Arterials typically have higher pedestrian activity than local roadways and may be a higher risk.

- **Pedestrian/vehicle volumes** – Higher pedestrian/vehicle volume roadways are more likely to have higher risk than lower volume pedestrian/vehicle roadways. Pedestrian volumes may be quantified using indicators such as number of pedestrian actuations at signalized intersections.

- **Existing sidewalks** – The ADA does not require sidewalks to be installed, but existing sidewalks must be compliant and the accessible route must be maintained in an accessible condition. Locations with existing sidewalks are a higher risk than locations without existing sidewalks.

- **Public input** – Receiving and taking into consideration feedback from the public to better understand their concerns is recommended. While formal complaints may not have been filed, areas of concern to the public
are more likely to have a higher risk for litigation if an issue exists and the City does not respond and/or doesn’t make any improvements.

Other factors to consider include:

- **Spatial distribution of facilities** – Selecting facilities to be evaluated evenly across different areas of the City or Council districts might be more well-received by the public, assuming all the risk factors above are equal.

- **Facility type** – Selecting a variety of different facilities to be evaluated during each phase, instead of all of the same facility type, may provide a better understanding of your high-risk areas. If the sidewalks evaluated are determined to be mostly compliant and the curb ramps evaluated are determined to be mostly non-compliant, the City may want to consider including a higher percentage of curb ramps during the next phase of evaluations.

**Upcoming Capital Improvement Projects (CIP)** – If curb ramps will be completely removed and replaced as part of an upcoming project, the ADA compliance of the new construction should be confirmed during construction inspections and resources would be better spent evaluating curb ramps that are not planned for reconstruction.

The final step is to execute the Self-Evaluation Action Plan. The Action Plan may be modified as needed during and in between Self-Evaluation phases to account for lessons learned or budget changes.

### 4.6 Schedule and Implementation Methods

The City plans to phase the Self-Evaluation over the next several fiscal years. As part of the Transition Plan, the City will outline the anticipated number of years required to complete the Self-Evaluation of City programs, services, activities, and facilities.

After the Self-Evaluation is complete, possible solutions have been identified, and cost estimates have been determined for each improvement, an implementation plan will be developed. Depending on the estimated cost of improvements, a typical implementation plan for a City the size of the Port Orange can range from 10 to 20 years. The implementation plan will show both a strong commitment toward upgrading ADA elements identified in the inventory of barriers in the short-term (planned capital improvement projects) and a strong commitment over time toward prioritizing curb ramps at walkways serving entities covered by the ADA. The implementation plan will also include prioritization information, planning, and investments directed at eliminating other identified barriers over time.

To aid in the development of the implementation plan, prioritization information will be provided for each facility with identified compliance issues. **Table 4** provides proposed prioritization criteria for buildings/parks, and **Table 5** provides the prioritization that has been used for the evaluated sidewalk corridors and curb ramps. All compliance elements included in the prioritization schedule are based on requirements from the 2010 ADA Standards for Accessible Design, Title 24 of the 2012 Florida Accessibility Code for Building Construction, and PROWAG. While every effort will be made to design and implement improvements to be consistent with these standards, the City will provide access to the maximum extent feasible where full compliance is technically infeasible. Priorities were assigned based on DOJ priorities for facility access, previous project experience, and case law with respect to the severity of non-compliance. FHWA and DOJ have not provided any guidance on how to prioritize issues, only that prioritization information should be included as part of the schedule; however, best practices suggest that the prioritization methodology and resulting thresholds be first based on the severity of non-compliance (i.e., dangerous condition) and then second based on the barrier’s proximity to pedestrian attractors (e.g., adjacent to a hospital or governmental facility with high daily pedestrian traffic). Since raw data is recommended to be collected during the
Self-Evaluation, all data needed for prioritization should already be contained in the database with the exception of known complaints and proximity to pedestrian attractors. To streamline the prioritization of each facility, the proximity to pedestrian attractors is recommended to be collected when the elements contained within the 2010 ADA Standards for Accessible Design, Title 24 of the 2012 Florida Accessibility Code for Building Construction, and PROWAG are evaluated.

Sidewalk corridors include the pedestrian path of travel along existing sidewalk segments (including driveways) and their associated curb ramps. The path of travel within the interior of signalized and unsignalized intersections (marked and unmarked crosswalks) were not included in the field evaluations. When prioritizing a sidewalk corridor, priorities for the entire pedestrian path of travel should be reported together.

It should also be noted that sidewalks are not required by the ADA, but if they are installed, sidewalks must be compliant. Therefore, missing sidewalk segments are given a low priority.

To determine the priority for each facility, the raw data will be compared to the criteria in Tables 4 and 5. To do this, start at Priority 1 and determine if any of the criteria apply. If yes, assign the facility a priority of 1. If no, move to Priority 2 and determine if any of the criteria apply. This process will be repeated until a priority has been assigned to all evaluated facilities and sidewalk corridor segments.

4.7 Prioritization

The following sections outline the prioritization factors and results of the prioritization for buildings, parks, sidewalks, and curb ramps at intersections. Each facility type has a different set of parameters to establish the prioritization for improvements. These prioritization factors were taken into consideration when developing the implementation plan for the proposed improvements.

4.7.1 Prioritization Factors for Facilities

Buildings and parks are prioritized on a 12-point scale, which is defined in Table 4. This prioritization methodology was developed by the Consultant Team to aid the City in determining which buildings and parks should be prioritized for improvements over other buildings and parks based on the severity of non-compliance with ADA.

Sidewalk corridors and curb ramps were prioritized on a 3-point scale and were given a priority of either 1/High/Severe, 2/Medium/Moderate, or 3/Low/Slight based on the severity of non-compliance, which is defined in Table 5. After the identification of priorities for individual sidewalk segments or curb ramps, a condition index is used to represent the overall condition of the facility based on the frequency and severity of issues. The condition index was developed to describe the walkability of a sidewalk corridor. Severe distresses impacting walkability, such as faulting, shattered slabs, and sinking/heaving result in lower condition index values. Less severe distresses such as patching, weed intrusion, and presence of texture and color contrast result in higher condition index values. The condition index is broken into subcategories as shown in Table 6.
### Table 4. Prioritization Factors for Buildings/Parks

<table>
<thead>
<tr>
<th>Priority</th>
<th>Criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 (high)</td>
<td>Complaint known or imminent danger present</td>
</tr>
</tbody>
</table>
| 2 (high) | - Element is more than twice the allowable requirement. No known complaint  
- AND (for exterior conditions) location is near a hospital, school, transit stop, government building, or other pedestrian attractor. |
| 3 (high) | - Element is more than twice the allowable requirement. No known complaint  
- AND (for exterior conditions) location is not near a hospital, school, transit stop, government building, or other pedestrian attractor. |
| 4 (high) | Issues with parking or exterior conditions (DOJ level 1) – moderately out of compliance |
| 5 (medium) | Issues with access to goods and services (DOJ level 2) – severely out of compliance |
| 6 (medium) | Issues with:  
- Access to goods and services (DOJ level 2) – moderately out of compliance;  
- Parking or exterior conditions (DOJ level 1) – minimally out of compliance; OR  
- Restrooms (DOJ level 3) – severely out of compliance |
| 7 (medium) | Issues with:  
- Access to goods and services (DOJ level 2) – minimally out of compliance;  
- Restrooms (DOJ level 3) – moderately out of compliance; OR  
- Drinking fountains or public phones (DOJ level 4 & 5) – severely out of compliance |
| 8 (medium) | Issues with drinking fountains or public phones (DOJ level 4 & 5) – moderately out of compliance |
| 9 (low) | Issues with restrooms (DOJ level 3) – minimally out of compliance |
| 10 (low) | Issues with drinking fountains or public phones (DOJ level 4 & 5) – minimally out of compliance |
| 11 (low) | - Client is a Title II agency; AND  
- Elements out of compliance but may be able to be handled programmatically or do not need to be handled unless or until the agency hires a person with a disability |
| 12 (low) | Element is fully compliant with an older standard (safe-harbored) but will need to be brought into compliance with current standards if altered |
Table 5. Prioritization Factors for Sidewalk Corridors and Curb Ramps

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Description</th>
<th>Priority</th>
<th>1 (Severe)</th>
<th>2 (Moderate)</th>
<th>3 (Slight)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Heave</td>
<td>Sidewalk/ramp or multiple slabs have uplifted over a short length</td>
<td></td>
<td>&gt; 5&quot; over 5' (&gt; 8%)</td>
<td>2.5&quot; to 5&quot; over 5' (4% to 8%)</td>
<td>0&quot; to 2.5&quot; over 5' (4%)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sag</td>
<td>Sidewalk/ramp or multiple slabs have settled over a short length</td>
<td></td>
<td>&gt; 5&quot; over 5' (&gt; 8%)</td>
<td>2.5&quot; to 5&quot; over 5' (4% to 8%)</td>
<td>0&quot; to 2.5&quot; over 5' (4%)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tilt</td>
<td>Sidewalk/ramp or multiple slabs have tilted over a short length</td>
<td></td>
<td>&gt; 4% (&gt; 1&quot; over 2')</td>
<td>2% to 4% (1/2&quot; to 1&quot; over 2')</td>
<td>0% to 2% (1/2&quot; over 2')</td>
</tr>
<tr>
<td>Shattered Slab</td>
<td>Slab/walk/ramp have two or more cracks and may be associated with settlement</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Transverse Crack</td>
<td>A crack across the width of a slab/walk/ramp</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Longitudinal Crack</td>
<td>A crack along the length of a slab/walk/ramp</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fault</td>
<td>Vertical displacement at a joint or crack (either up or down)</td>
<td></td>
<td>&gt; 1&quot;</td>
<td>1/2&quot; to 1&quot;</td>
<td>&lt; 1/2&quot;</td>
</tr>
<tr>
<td>Texture</td>
<td>Loss of fines, crazing, pop outs or scaling of the sidewalk/ramp surface</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Corner Break</td>
<td>The corner of a slab/ramp (greater than a 6-square inch area) has broken off or edge of walk has become ragged</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Joint Damage</td>
<td>The joints have opened or loss of joint sealant</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Patching</td>
<td>The sidewalk/ramp has been patched or cut and patched</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Slope</td>
<td>The sidewalk/ramp has excessive slope</td>
<td></td>
<td>&gt; 12.5% slope 3&quot; in 2'</td>
<td>8.33% to 12.5% 2&quot; to 3&quot; in 2'</td>
<td>Up to 8.33% slope Up to 2&quot; in 2'</td>
</tr>
</tbody>
</table>
Table 6. Condition Index Rating for Sidewalk Corridors and Unsignalized Intersection Curb Ramps

<table>
<thead>
<tr>
<th>Condition Rating (Priority)</th>
<th>Condition Index Range</th>
</tr>
</thead>
<tbody>
<tr>
<td>Excellent</td>
<td>90 ≤ Condition Index ≤ 100</td>
</tr>
<tr>
<td>Very Good</td>
<td>80 ≤ Condition Index &lt; 90</td>
</tr>
<tr>
<td>Good</td>
<td>70 ≤ Condition Index &lt; 80</td>
</tr>
<tr>
<td>Fair</td>
<td>60 ≤ Condition Index &lt; 70</td>
</tr>
<tr>
<td>Marginal</td>
<td>40 ≤ Condition Index &lt; 60</td>
</tr>
<tr>
<td>Poor</td>
<td>20 ≤ Condition Index &lt; 40</td>
</tr>
<tr>
<td>Very Poor</td>
<td>0 ≤ Condition Index &lt; 20</td>
</tr>
</tbody>
</table>

4.8 Facilities Review

4.8.1 Sidewalk Corridors

Sidewalk corridor evaluations were conducted on 323 miles of City owned sidewalk. The evaluations included condition assessments and measurements along the pedestrian path of travel, which includes the sidewalk, curb ramps, and pedestrian crossings at driveway openings. A map of the evaluated sidewalk corridors is provided in Appendix D.

Per Section 4.7.1, Tables 7 and 8 provide summaries of the prioritization classifications for sidewalks and curb ramps at intersections, respectively.

Table 7. Prioritization Summary for Sidewalk Corridors

<table>
<thead>
<tr>
<th>Condition Rating (Priority)</th>
<th>Sidewalk Length (miles)</th>
</tr>
</thead>
<tbody>
<tr>
<td>No Sidewalk with Obstruction (Low)</td>
<td>0.3</td>
</tr>
<tr>
<td>Excellent (Low)</td>
<td>100.8</td>
</tr>
<tr>
<td>Very Good (Low)</td>
<td>94.5</td>
</tr>
<tr>
<td>Good (Low)</td>
<td>98.3</td>
</tr>
<tr>
<td>Fair (Medium)</td>
<td>23.7</td>
</tr>
<tr>
<td>Marginal (Medium)</td>
<td>4.3</td>
</tr>
<tr>
<td>Poor (High)</td>
<td>0.7</td>
</tr>
<tr>
<td>Very Poor (High)</td>
<td>0.3</td>
</tr>
<tr>
<td>Total</td>
<td>322.9</td>
</tr>
</tbody>
</table>
Table 8. Prioritization Summary for Unsignalized Intersection Curb Ramps

<table>
<thead>
<tr>
<th>Condition Rating (Priority)</th>
<th>Number of Curb Ramps</th>
</tr>
</thead>
<tbody>
<tr>
<td>Excellent (Low)</td>
<td>60</td>
</tr>
<tr>
<td>Very Good (Low)</td>
<td>381</td>
</tr>
<tr>
<td>Good (Low)</td>
<td>1,125</td>
</tr>
<tr>
<td>Fair (Medium)</td>
<td>75</td>
</tr>
<tr>
<td>Marginal (Medium)</td>
<td>437</td>
</tr>
<tr>
<td>Poor (High)</td>
<td>127</td>
</tr>
<tr>
<td>Very Poor (High)</td>
<td>48</td>
</tr>
<tr>
<td>Missing Ramp where Ramp Needed (High)</td>
<td>1,348</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>3,601</strong></td>
</tr>
</tbody>
</table>

Sidewalk Corridors: Self-Evaluation Findings

Common issues along the sidewalk corridors were excessive sidewalk cross slopes, vertical surface discontinuities that caused excessive level changes, excessive driveway and cross street cross slopes, permanent obstructions in the sidewalk such as power poles or utilities, and temporary obstructions in the sidewalk or path of travel such as weeds and low hanging branches. Where excessive vegetation was present, field crews attempted to assess the condition of the underlying sidewalk. Where possible, the condition of the underlying sidewalk was recorded; however, the City of Port Orange may find additional issues with the sidewalk once the temporary obstruction is removed.

Common curb ramp issues at intersections along the sidewalk corridors included curb ramps having no presence of color contrast or texture contrast, excessive running slopes and cross slopes, excessive landing running slopes and cross slopes, and excessive flare cross slopes. A complete listing of the curb ramp issues is provided in the project reports in Appendix E. Non-compliant curb ramps, sidewalk, and pedestrian paths of travel along driveways were recommended to be removed and replaced. Table 9 provides a summary of curb ramp issues.

The ADA of 1990, Section 35.150, Existing Facilities, requires that the Transition Plan include a schedule for providing curb ramps or other sloped area at existing pedestrian walkways, which applies to all facilities constructed prior to 1992. For any sidewalk installations constructed from 1992 to March 15, 2012, the curb ramps should have been installed as part of the sidewalk construction project per the 1991 Standards for Accessible Design, Section 4.7 Curb Ramp, which states, “curb ramps complying with 4.7 shall be provided wherever an accessible route crosses a curb.” For sidewalk installations constructed on or after March 15, 2012, similar guidance is provided in the 2010 Standards for Accessible Design, Section 35.151 of 28 Code of Federal Regulations (CFR) Part 35, New Construction and Alterations, which states, “newly constructed or altered street level pedestrian walkways must contain curb ramps or other sloped area at any intersection having curb or other sloped area at intersections to streets, roads, or highways.”
Sidewalk Corridors: Possible Solutions

To meet the federal requirements for curb ramp installations, the following recommendations are provided:

- Where sidewalk leads up to the curb at an intersection, both parallel and perpendicular to the project corridor, two (2) directional curb ramps are recommended to be installed where geometry permits. PROWAG requires two (2) directional curb ramps be installed during modifications unless there are existing physical constraints.

- Where sidewalk parallel to the project corridor leads up to the curb at a driveway, directional curbs ramps are recommended to be installed to serve the driveway crossing.

- Where diagonal curb ramps were installed with the intent to serve a side-street crossing only, receiving curb ramps are still required to be installed on the opposite side of the major street. However, an engineering study should be performed prior to the installation of the receiving curb ramps to determine if the major street crossing is safe to accommodate. If the engineering study determines the major street crossing is unsafe to accommodate, the existing diagonal curb ramps should be removed and replaced with directional curb ramps in addition to the other requirements noted in Section 2.7 Federal Highway Administration (FHWA) Guidance on Closing Pedestrian Crossings.

When planning improvements to remove the identified accessibility barriers, the following engineering judgement or best practices recommendations should be made to maximize pedestrian safety. It should be noted that these improvements are advised but not required per federal standards.

- For pedestrian crossings across commercial driveways, detectable warning surfaces are recommended to be installed on curb ramps or sidewalk approaches on either side of the driveway. PROWAG states that detectable warning surfaces should not be provided at crossings of residential driveways since the pedestrian right-of-way continues across residential driveway aprons. However, where commercial driveways are provided with yield or stop control, detectable warning surfaces should be provided at the junction between the pedestrian route and the vehicular route.

A complete list of possible solutions can be found in the sidewalk and intersection curb ramp facility reports provided in Appendix E.

<table>
<thead>
<tr>
<th>Curb Ramp Element</th>
<th>Number Evaluated</th>
<th>Number Compliant</th>
<th>Percent Compliant</th>
</tr>
</thead>
<tbody>
<tr>
<td>Curb ramp turning space (landing) exists</td>
<td>2,253</td>
<td>2,244</td>
<td>99.6%</td>
</tr>
<tr>
<td>Curb ramp cross slope ≤ 2%</td>
<td>2,253</td>
<td>1,847</td>
<td>82.0%</td>
</tr>
<tr>
<td>Curb ramp turning space (landing) cross slope ≤ 2%</td>
<td>2,244</td>
<td>1,834</td>
<td>81.7%</td>
</tr>
<tr>
<td>Curb ramp turning space (landing) running slope ≤ 2%</td>
<td>2,244</td>
<td>1,580</td>
<td>70.4%</td>
</tr>
<tr>
<td>Flare cross slope ≤ 10%</td>
<td>228</td>
<td>144</td>
<td>63.2%</td>
</tr>
<tr>
<td>Curb ramp present where curb ramp is needed</td>
<td>3,611</td>
<td>2,253</td>
<td>62.4%</td>
</tr>
<tr>
<td>Curb ramp running slope ≤ 8.3%</td>
<td>2,253</td>
<td>862</td>
<td>38.3%</td>
</tr>
<tr>
<td>Presence of detectable warning surface</td>
<td>2,253</td>
<td>591</td>
<td>26.2%</td>
</tr>
</tbody>
</table>
4.9 Conclusion

This document serves as the ADA Transition Plan for the City of Port Orange. In developing the Transition Plan, PSAs were reviewed for compliance with ADA guidelines and a Self-Evaluation was conducted on the following facilities:

- 323 miles of sidewalk and driveways along the sidewalk corridors; and
- 3,601 curb ramps along the sidewalk corridors.

Possible solutions were prioritized, and an implementation plan was developed to provide guidance for the City’s improvement projects in the coming years. Public outreach will be conducted to aid in the development of the plan.

The City is taking the actions referenced below and will continue to look for and remedy barriers to access to ensure that Port Orange citizens who are disabled are given access to the City’s PSAs.

To confirm follow-up on corrective actions required under the Transition Plan, the City will institute an ADA Action Log, documenting its efforts at compliance with the ADA. At a minimum, the Action Log will identify items that are not ADA compliant and will include anticipated completion dates. After the City adopts the Transition Plan, the ADA Action Log will be updated on an annual basis. The ADA Action Log should be available upon request. See the ADA Action Log provided in Appendix F.
5.0 Facility Costs

5.1 Facilities Cost Projection Overview

To identify funding sources and develop a reasonable implementation schedule, cost projection summaries for only the facilities evaluated were developed for each facility type. To develop these summaries, recent bid tabulations from the Florida Department of Transportation (FDOT) construction projects, along with Consultant Team experience with similar types of projects, were the basis for the unit prices used to calculate the improvement costs. All costs are in 2019 dollars. Table 10 provides a summary of the estimated costs to bring each facility into compliance.

<table>
<thead>
<tr>
<th>Facility Type</th>
<th>Priority</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>High</td>
<td>Medium</td>
</tr>
<tr>
<td>Public Rights-of-Way Sidewalk</td>
<td>$125,892</td>
<td>$1,799,562</td>
</tr>
<tr>
<td>Public Rights-of-Way Unsignalized Intersection Curb Ramps</td>
<td>$4,633,565</td>
<td>$1,595,584</td>
</tr>
<tr>
<td>City Totals</td>
<td>$4,759,456</td>
<td>$3,395,145</td>
</tr>
</tbody>
</table>

5.2 Implementation Schedule

Table 11 details the barrier removal costs and proposed implementation schedule by facility type for all City-owned facilities evaluated. This 10-year plan will serve as the implementation schedule for the Transition Plan. The City of Port Orange reserves the right to change the barrier removal priorities on an ongoing basis to allow flexibility in accommodating community requests, petitions for reasonable modifications from persons with disabilities, and changes in City programs.

It is the intent of the City to have its ADA Coordinator work together with department heads and budget staff to determine the funding sources for barrier removal projects. Once funding is identified, the ADA Coordinator will coordinate the placement of the projects in the Capital Improvement Program (CIP) to be addressed on a fiscal year basis.

<table>
<thead>
<tr>
<th>Facility Type</th>
<th>Estimated Cost</th>
<th>Implementation Schedule (years)</th>
<th>Approximate Annual Budget</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Rights-of-Way Sidewalk</td>
<td>$7,177,900</td>
<td>10</td>
<td>$717,790</td>
</tr>
<tr>
<td>Public Rights-of-Way Unsignalized Intersection Curb Ramps</td>
<td>$10,533,500</td>
<td>10</td>
<td>$1,053,350</td>
</tr>
<tr>
<td>City Total</td>
<td>$17,711,400</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Total Annual Budget</strong></td>
<td></td>
<td></td>
<td><strong>$1,771,140</strong></td>
</tr>
</tbody>
</table>
5.3 Funding Opportunities

Numerous alternative funding sources are available to complete the improvements in this Transition Plan. Funding opportunities include applying for resources at the federal and state level, consideration of local options, and leveraging private resources. The following sections detail some different funding source options.

5.3.1 Federal and State Funding

Table 12 (on the following page) summarizes the available federal and state funding sources. This funding can be applied for various improvements. The following agencies and funding options are represented in the chart.

- BRI – Bridge - Highway Bridge Replacement and Rehabilitation (HBRRP)
- CMAQ – Congestion Mitigation/Air Quality
- FLH – Federal Lands Highways Program
- HSIP – Highway Safety Improvement Program
- NHPP – National Highway Performance Program
- RHC – Railway-Highway Crossing
- SRTS – Safe Routes to School (Moving Ahead for Progress in the 21st Century Act (MAP-21) now under TAP)
- STBG – Surface Transportation Block Grant
- TAP – Transportation Alternatives Program
- LAP – Local Agency Program

Most of these programs are competitive type grants; therefore, the City of Port Orange is not guaranteed to receive these funds. The City will continue to track these programs to apply for available funds.

5.2 Local Funding

The City will also consider several local funding options, including:

- Community Development Block Grants (CDBG)
- Community Improvement District (CID) – A geographically defined district in which commercial property owners vote to impose a self-tax. Funds are then collected by the taxing authority and given to a board of directors elected by the property owners.
- General fund (sales tax and bond issue)
- Scheduled/funded CIP projects that are funded through bonds
- Sidewalk or Access Improvement Fee
- Special tax districts – A district with the power to provide some governmental or quasi-governmental service and to raise revenue by taxation, special assessment, or charges for services.
- Tax Allocation District (TAD) – A defined area where real estate property tax monies gathered above a certain threshold for a certain period of time (typically 25 years) to be used for a specified improvement. The funds raised from a TAD are placed in a tax-free bond (finance) where the money can continue to grow. These improvements are typically for revitalization and especially to complete redevelopment efforts.
• Tax Increment Financing District (TIF) – A TIF allows cities to create special districts and to make public improvements within those districts that will generate private-sector development. During the development period, the tax base is frozen at the predevelopment level. Property taxes continue to be paid, but taxes derived from increases in assessed values (the tax increment) resulting from new development either go into a special fund created to retire bonds issued to originate the development, or leverage future growth in the district.

• Transportation Reinvestment Zone Transportation User Fee / Street Maintenance Fee

<table>
<thead>
<tr>
<th>ACTIVITY</th>
<th>BRI</th>
<th>CMAQ</th>
<th>FLH</th>
<th>HSIP</th>
<th>NHPP</th>
<th>RHC</th>
<th>SRTS</th>
<th>STBG</th>
<th>TAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pedestrian plan</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Paved shoulders</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Shared-use path/trail</td>
<td></td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Recreational trail</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Spot improvement program</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Maps</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Trail/highway intersection</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sidewalks, new or retrofit</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Crosswalks, new or retrofit</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Signal improvements</td>
<td></td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Curb cuts and ramps</td>
<td>X</td>
<td></td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Traffic calming</td>
<td></td>
<td>X</td>
<td>X</td>
<td></td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Safety brochure/book</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Training</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

5.3 Private Funding

Private funding may include local and national foundations, endowments, private development, and private individuals. While obtaining private funding to provide improvements along entire corridors might be difficult, the City will require private developers to improve pedestrian facilities to current ADA requirements, whether as part of new development or redevelopment of an existing property.
6.0 Next Steps

This document serves as the Americans with Disabilities Act (ADA) Transition Plan for the City of Port Orange. The City intends to complete the Self-Evaluation of its sidewalks and associated curb ramps in 2019, followed by the Self-Evaluation of City programs, services, activities, and facilities identified in this document over the next ten (10) years.

The next steps for the City of Port Orange are:

1. Develop an online public access survey and interactive map to provide a summary of the transition planning process and receive feedback on any concerns related to accessibility. Estimated completion in early 2020.

2. Develop an Action Plan for completing a Self-Evaluation for all City programs, services, activities, and remaining facilities.

3. Complete a Self-Evaluation for all City programs, services, activities, and remaining facilities. Facility evaluations should also include the following:
   a. Facility reports with the compliance status of each element evaluated based on the 2010 ADA Standards for Accessible Design, Title 24 of the 2012 Florida Accessibility Code for Building Construction, and PROWAG;
   b. Possible solutions to remove any barriers and bring the element into compliance;
   c. Estimated costs of possible solutions; and
   d. Prioritization of the individual facility, independent of other locations of the same facility type.

4. Develop an Implementation Plan, including schedule for completing the recommended facility improvements and funding sources to be used.

5. If a phased Self-Evaluation approach is used, complete remaining Self-Evaluation phases and update the City’s ADA Transition Plan after each additional phase.

6. Continue to update the City’s ADA Transition Plan as projects are implemented and citizen requests/complaints are received.

7. Determine the best approach for receiving public input on the ADA Transition Plan.
Appendix

Appendix A: Grievance Procedure
   A-1: City of Port Orange Title I Grievance Procedure
   A-2: City of Port Orange Title I Grievance Form
   A-3: City of Port Orange Title II Grievance Procedure
   A-4: City of Port Orange Title II Grievance Form

Appendix B: City of Port Orange Notice under the Americans with Disabilities Act

Appendix C: Federal Highway Administration ADA Transition Plan Process Memo

Appendix D: Facility Maps
   D-1: Buildings
   D-2: Parks
   D-3: Signalized Intersections
   D-4: PROW Sidewalk Corridors

Appendix E: Facility Reports
   F-1: PROW Sidewalk Corridors
   F-2: PROW Intersections

Appendix F: Action Log