



Boca Raton, Florida
**ADA Self-Evaluation
& Transition Plan**

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Abbreviations

ADA – Americans with Disabilities Act

CFR – Code of Federal Regulations

CIP – Capital Improvement Program

DOJ – United States Department of Justice

FDOT – Florida Department of Transportation

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 – Programs, Services, and Activities

SAD – 1991 Standards for Accessible Design



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1.0 Introduction

1.1 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 Boca Raton to update their ADA Transition Plan. Prioritization methodology for evaluating and implementing improvements was developed based on the applicable 2010 ADA Standards and 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 Boca Raton based on guidance from the Federal Highway Administration (FHWA) and U.S. Department of Justice (DOJ) to improve accessibility for the public.

1.2 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 Boca Raton has undertaken a comprehensive evaluation of its PSAs to determine the extent that individuals with disabilities may be restricted in their access.

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

The City of Boca Raton 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 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 Boca Raton'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 several 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 PSAs and facilities that accommodate all its citizenry.



1.4 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 to 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:

1.4.1 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

1.4.2 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

1.4.3 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.

1.4.4 City of Boca Raton Approach

The purpose of the Transition Plan is to provide the framework for achieving equal access to the City of Boca Raton's PSAs 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 Boca Raton residents seek to enjoy, and guides future improvements. This Plan has been prepared after careful study of all the City's programs, services, activities, and facilities.

The City of Boca Raton 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 Boca Raton will not place surcharges on individuals with disabilities to cover the cost involved in making PSAs accessible.



1.5 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 nine (9) historic sites/districts within the City. Additionally, City staff has identified several seven (7) historic properties. The 16 historic sites within the City include:

- Administration Buildings
- Fred C. Aiken House
- Boca Raton Fire Engine No. 1
- Boca Raton Old City Hall
- Florida East Coast Railway Passenger Station
- House at 1240 Coconut Road
- Lavender House
- Seaboard Air Line Lounge Car 6113
- Seaboard Air Line Lounge Car 6603
- City of Boca Raton Children Museum
- City of Boca Raton Historical Society
- Rowland Tackbary House
- Ronald H Miller House
- House at 290 SW 2nd Ave
- House at 1281 Coconut Rd
- House at 800 De Soto Rd

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.



1.6 New Construction and Alterations

The most accessibility 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 Code of Federal Regulations (CFR) 35.151 and the 2004 Americans with Disabilities Act Accessibility Guidelines (ADAAG). However, the FHWA and DOJ recommend using 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) is also incorporated by reference within PROWAG. As of April 2020, the Florida Department of Transportation (FDOT) has recommended PROWAG as the “state of practice” for projects involving facilities within public right-of way (<https://www.fdot.gov/docs/default-source/roadway/ada/ADA-QA.pdf>), and FDOT has incorporated criteria from PROWAG into their design standards and Plans Preparation Manual. The City of Boca Raton is considering adopting 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 date 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 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 FHWA to obtain basic uniformity of traffic control devices shall be as described in 23 CFR 655, Subpart F.



1.7 Maintenance Versus Alterations

The United States DOJ has issued a briefing memorandum on clarification of maintenance versus alteration projects. Information contained in the briefing memorandum is below. City staff follows the DOJ requirements regarding when curb ramp installations are required on alteration projects.

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 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.

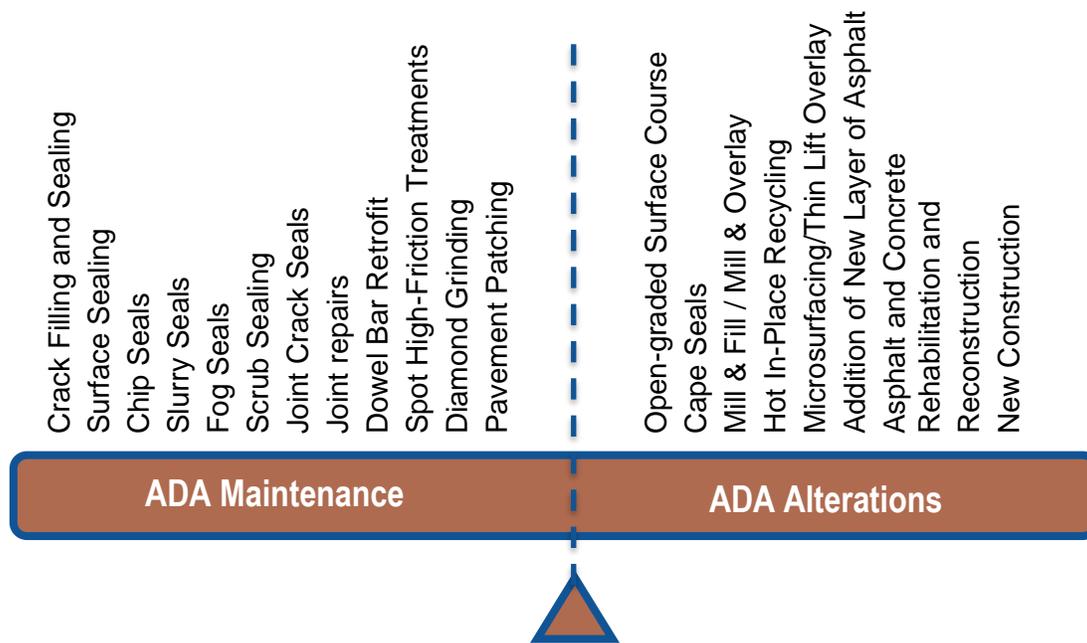
This clarification provides a single Federal policy that identifies specific asphalt and concrete-pavement repair treatments that are considered to be alterations – requiring installation of curb ramps within the scope of the project – and those that are considered to be maintenance, which do not require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

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Figure 1. Maintenance versus Alteration Projects



Source: DOJ Briefing Memorandum on Maintenance versus Alteration Projects

1.8 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.

Agencies 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. The City will only consider closing an existing pedestrian crossing if it is determined to be unsafe by an engineering study.

1.9 Existing City Programs that Implement ADA Upgrades

The City of Boca Raton currently implements ADA compliant designs through the efforts listed below:

- The City has a Capital Improvement Project where \$200,000 per year are budgeted for ADA improvements. These funds are primarily used in facilities.



The City has also implemented ADA improvements through several recent projects. These include:

- City Hall Restrooms (total of four Restrooms)
- City Hall Corridors (internal means of egress)
- City Hall Council Chambers (accessibility in the chambers)
- City Hall Signage (complied with having tactile or braille on room signs)
- Multiple facilities door hardware (door closers and hardware)
- Multiple facilities (meeting the appropriate height for countertop surfaces)
- Multiple facilities drinking fountains (still in progress)
- Building Administration Code Enforcement (BACE) building restrooms
- Building Administration Code Enforcement (BACE) building (access from parking lot to building via the sidewalks)
- Audible pedestrian signal installation at signalized intersections (14 intersections)
- South Beach Park
 - Main restroom pavilion
 - Pavilion viewing parking lot to restroom
 - Bunker restroom
- Red Reef Park
 - North restroom and parking to restroom
 - Central restroom and new sidewalk from parking lot
- George Snow Park
 - Restroom
- Hughes Park
 - Restroom entrance areas (future construction)
- Gumbo Limbo Nature Center
 - Tower (future construction)
 - Boardwalk renovations
 - Main parking lot will have two accessible parking spaces and curb ramp to entrance to new renovated boardwalk heading to tower (future construction)
- Spanish River Park
 - Restroom Facilities #3, #4, and #5 (future construction)
- Hillsboro El Rio Park
 - Restroom facility
- Curb ramp and sidewalk improvements
 - NW 2nd Avenue (Palmetto Road to Yamato Road)
 - St. Andrews (Potomac Road to Yamato Road)
 - Spanish River and 3rd Avenue intersection
 - Yamato Road (St. Andrews to Jog Road)
- Sidewalk/pathway replacement to remove tripping hazards
 - Whisem Subdivision
 - Caldwell Heights Subdivision
 - New Floresta Subdivision
 - Strathmore Subdivision
 - Pinelands North Subdivision
 - University Gardens Subdivision
 - Knob Hill Subdivision
 - Sunset Ridge Subdivision
 - Cedar Ridge Subdivision



- Vista Hills Subdivision
- Boca Square Subdivision
- Palm Beach Farms Subdivision
- Meadow's Park
- Boca Isles Park
- Spanish River Park
- Reed Reef Park
- Boca Tierra Park

The City has designed ADA improvements at multiple park sites, which are scheduled for construction in 2021. These include:

- Wildflower Park and Silver Palm Park:
 - Accessible parking and path of travel improvements
 - Restroom improvements
 - Accessible seating included with stadium seating
- James A. Rutherford Park and Lake Wyman Park:
 - Accessible paths and access to all boardwalk components, pavilions, and kayak launch
 - Restroom improvements

The additional efforts listed below are focused on sidewalk and accessible parking design as well as alterations and repairs of existing structures or facilities. This information can be found in the City's code of ordinances (https://library.municode.com/fl/boca_raton/codes/code_of_ordinances):

Sec. 23-162. - Sidewalk policy:

Sidewalk improvements shall be installed along arterial and collector routes leading from and adjacent to single-family, duplex and multifamily residential districts to centers of community activity such as schools, shopping areas, recreational areas and similar community facilities, and where considered necessary for pedestrian safety.

Sidewalks shall be installed or expanded in accordance with standards set forth in the Engineering Design Standards Manual. The widths of newly constructed or expanded sidewalks shall be as follows:

- (a) Single-family and duplex residential zoning districts - 5 feet
Arterial and collector routes leading from and adjacent to single-family and duplex residential zoning districts - 6 feet
- (b) Multifamily zoning districts - 5 feet
Arterial and collector routes leading from and adjacent to multi-family zoning districts - 6 feet
- (c) All other zoning districts - 6 feet
- (d) Special Corridors; A1A, Yamato Road, Glades Road, North Federal Highway, Military Trail and Clint Moore Road - 8 feet
Downtown areas: Palmetto Park Road and Federal Highway - 8 feet
- (e) Within VC Zoning Districts



Table 1. City of Boca Raton Sidewalk Width Requirements for Various Street Types

Street Type	Required Sidewalk Width
Primary Street	22 feet, which includes a covered area if a clear path of pedestrian travel that is at least 10 feet wide is provided under the cover.
Secondary street, if the sidewalk abuts nonresidential or mixed-uses	10 feet where there is parallel parking between the sidewalk and the travel lanes of the street; 15 feet where no parallel parking or 4-foot wide landscape buffer are provided.
Secondary street, if the sidewalk abuts residential uses	8 feet where there is parallel parking or a 4-foot wide landscape buffer between the sidewalk and the travel lanes of the street; 15 feet where no parallel parking or 4-foot wide landscape buffer are provided.
Residential street	6 feet where there is parallel parking or a 4-foot wide landscape buffer between the sidewalk and the travel lanes of the street; 10 feet where no parallel parking or 4-foot wide landscape buffer are provided.
Service street	5 feet on one side of the street.
Federal highway	8 feet of clear path with a minimum of 5 feet of planted buffer.
Dixie highway	6 feet of clear path with a minimum of 5 feet of planted buffer.

Sec. 28-1393. – Sidewalks:

Sidewalks shall be constructed at service stations along the street perimeter in accordance with adopted city standards.

Sec. 28-1648. - Alteration, repair of existing structure or facility:

Where an alteration or redevelopment to a building or facility is permitted, handicapped parking and pedestrian access shall be provided as specified in this article.

Sec. 28-1653. - Design.

Handicapped parking. Handicapped parking stalls shall be provided in accordance with applicable federal and state standards; such stalls shall be located in close proximity to aiseways, accessible routes, elevators, ramps or such other facilities as are provided or required for use by and for accommodation of the handicapped. In parking structures, 1 in every 8 accessible spaces, but not less than 1 space, shall be "van accessible". The vertical clearance shall be 98 inches at the van accessible parking space and along at least 1 vehicle access route to such spaces from site entrance and exit.

Pedestrian access. Off-street parking facilities in multi-family and non-residential zoning districts shall provide 5-foot wide accessible routes separated from motor vehicle traffic and marked crosswalks from required public sidewalks to building entrances.



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2.0 Public Outreach

The City created a public access survey in English, Spanish, and Creole to provide a summary of the transition planning process and receive feedback on any concerns related to accessibility.

2.1 Web Survey

The survey was designed to help the City locate areas of greatest concern to the public and help provide better access to the community. The survey can be accessed via the following links:

- https://www.surveymonkey.com/r/Boca_Raton_ADA
- https://www.surveymonkey.com/r/Boca_ADA_Spanish
- https://www.surveymonkey.com/r/Boca_ADA_Creole

The web survey was posted on the City's web page, sent out through social media, and emailed to local disability organizations for redistribution. Both will remain online through the end of 2020 and serve as a tool to solicit feedback from the public on the Transition Plan. The public access survey results are summarized in **Appendix A**.



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3.0 Self-Evaluation and Summary of Findings

The City of Boca Raton's ADA Transition Plan will include the results of a comprehensive review of the PSAs 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, public rights-of-way sidewalks and associated curb ramps, transit stops, and on-street parking.

3.1 Programs, Procedures, and Policies Review

Under the ADA, the City of Boca Raton 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 PSAs, 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 provided to produce 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.

PSAs offered by the City to the public must be accessible. Accessibility applies to all aspects of a program, services, 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 ADA/504 Coordinator and/or an authorized designee of the City, such as the City Manager or their 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.

3.1.1 ADA/504 Coordinator (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 Boca Raton has appointed Michael DiNorscio as ADA/504 Coordinator for Title II. Below is his contact information.

Michael DiNorscio, ADA/504 Coordinator
Building Official
Building Permits Department
200 NW 2nd Ave
Boca Raton, FL 33432
Office: 561-393-7961
FL Relay: 7-1-1
mdinorscio@ci.boca-raton.fl.us

The ADA/504 Coordinator contact information has and will be provided to interested parties. This information is prominently displayed in common areas that are accessible to all employees and areas open to the public. Also, the ADA/504 Coordinator contact information is listed on the City's website and included in materials that are distributed from the City as part of the public notice under the ADA described in **Section 3.1.4**. More information is presented in the following section. Additional information is available in Chapter 2 of the ADA best practice toolkit here: <https://www.ada.gov/pcatoolkit/chap2toolkit.htm>.

3.1.2 Roles and Responsibilities of the ADA/504 Coordinator

Below is a list of qualifications for ADA Coordinators as presented by the 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;
- 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.

3.1.3 ADA Grievance Policy, Procedure, and Form with Appeals Process for the ADA

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.

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

The City of Boca Raton Title II ADA Grievance Policy, Procedure, and Form were developed in September 2020. A copy of the City's Title II Grievance Procedure and Form are provided in **Appendix B** and is posted on the City's website.



3.1.4 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 entity's PSAs. This notice is required to include information regarding Title II of the ADA and how it applies to the PSAs of the public entity. Publishing and publicizing the ADA notice is not a one-time requirement. State and local government entities should provide the information on an ongoing basis, whenever necessary. 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.

DOJ suggestions for ways to provide notice are provided at: <https://www.ada.gov/pccatoolkit/chap2toolkit.htm>.

Public Notice Under the ADA: Completed Actions

A City of Boca Raton Public Notice Under the ADA was developed in September 2020. A copy of the City's Public Notice Under the ADA is provided in **Appendix B** and is posted on the City's website. Publicizing the ADA notice is not a one-time requirement, and the City will provide the information on an ongoing basis, whenever necessary.

3.1.5 ADA Liaison Committee

The ADA Liaison Committee 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 Liaison Committee to coordinate the implementation of plans, programs, policies, and procedures.

ADA Liaison Committee: Self-Evaluation Findings / Solutions

The City of Boca Raton is in the process of establishing an ADA Liaison Committee that will be comprised of a representative 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 ADA issues impacting their department. Each representative is responsible for keeping a detailed log for all ADA inquiries within their department. This log shall be shared with the ADA/504 Coordinator and shall be retained for at least three (3) years and in accordance with State public retention guidelines.

3.1.6 Design Standard Review

Public rights-of-way pedestrian elements within the City of Boca Raton Engineering Design Standards Manual (2012) were reviewed for compliance with the 2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG).

Design Standard Review: Self-Evaluation Findings

A complete list of findings is provided in **Appendix D**.



3.2 Programs, Services, and Activities Review

The City of Boca Raton plans to compile a list of all City programs, services, and activities 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.

Updates to the City's Transition Plan will be made to include findings and possible solutions for identified barriers as the inventory and Self-Evaluation of these PSAs are completed.

3.3 Facilities Self-Evaluation Action Plan

The 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 Boca Raton 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 PROWAG.



3.4 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, signalized intersections, sidewalk corridors, transit stops, and on-street parking. Inventories for signalized intersections, sidewalk corridors, transit stops, and on-street parking have been developed and are summarized in the following sections. The City plans to complete the existing facility inventory for buildings and parks in a subsequent project phase.

3.4.1 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. Based on the inventory, the City maintains 139 signalized intersections which are shown on a map in **Appendix E**.

3.4.2 Sidewalks

Using aerial imagery and existing inventory information, an updated GIS-based inventory of City-maintained sidewalk corridors and cross street locations was developed in October 2020. Based on the inventory, the City of Boca Raton maintains approximately 265 miles of sidewalk corridors, including pedestrian street and driveway crossings. There are approximately 825 unsignalized cross street intersections and approximately 880 driveways and alleys along the City-maintained sidewalk corridors. Additionally, there are seven (7) locations where City-maintained sidewalk intersects an existing railroad crossing.

All City-maintained pedestrian paths of travel will be evaluated for compliance with PROWAG based on the conditions and measurements along the pedestrian path of travel, which includes the sidewalk, curb ramps, pedestrian crossings at driveway openings, and pedestrian crossings at unsignalized intersections with cross streets. At intersections where existing sidewalk does not cross the curb, and curb ramps are not installed, no evaluations are needed. Locations where curb ramps are missing, but are required, will also be identified and included in the Transition Plan.

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 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.” A map of the sidewalk corridors to be evaluated is included in **Appendix E**.

3.4.3 Transit Stops

Transit stops serving the City of Boca Raton are operated by Palm Tran (Palm Beach County’s Transit Agency) or Broward County Transit. Additionally, the Park at Broken Sounds (TPABS) offers shuttle service for the City of Boca Raton. The City of Boca Raton maintains 12 TPABS shuttle stops, and 28 Palm Tran transit stops. Additionally, where transit or shuttle stops intersect the City’s public right-of-way sidewalk network, the City and Palm Tran/Broward County Transit should coordinate to ensure compliant transitions are maintained between adjacent paved surfaces. A map of the transit stops to be evaluated is included in **Appendix E**.



3.4.4 On-street Parking

An updated GIS-based inventory of City-maintained on-street parking spaces was developed in October 2020. Based on the inventory, the City of Boca Raton maintains approximately 350 on-street parking spaces located in the downtown area. Additionally, the number of existing accessible parking spaces was summarized. All City-maintained on-street parking will be evaluated for compliance with PROWAG based on the conditions and measurements along the existing accessible on-street parking spaces. Additional information is provided in the on-street parking area map included in **Appendix E**.

Table 2. On-Street Accessible Parking Summary

Block ID	Total On Street Parking Spaces	Existing Accessible Spaces
1	70	2
2	41	0
3	55	0
4	19	0
5	27	1
6	30	1
7	11	1
8	31 (9 shared with block 7)	1
9	41 (10 shared with block 8)	0
10	24 (8 shared with block 9)	0
11	43 (2 shared with block 7 and 12 shared with block 8)	1

3.4.5 Facility Inventory Summary

Based on the completed inventory, the City has identified the following facilities for future evaluation:

- 139 signalized intersections;
- 265 miles of sidewalk and approximately 825 unsignalized intersections and 880 driveways along the sidewalk corridors;
- 40 transit stops; and
- 350 on-street parking spaces, 6 of which are currently accessible.

3.5 Self-Evaluation Action Plan

The second step in completing a Self-Evaluation is developing an Action Plan to evaluate all existing buildings, parks, signalized intersections, sidewalk corridors, transit stops, and on-street parking 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, the City will start the facility evaluations.



Evaluation Criteria

For each facility type, elements related to public accessibility 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 ESRI/ArcGIS software packages where information related to their maintained facilities is stored. As facility evaluations are scheduled or completed, the City will ensure all outcomes are incorporated into the City's existing ESRI/ArcGIS 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.

3.6 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 Boca Raton can range from 10 to 30 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 3** provides proposed prioritization criteria for buildings/parks, **Table 4** provides the prioritization criteria for sidewalk corridors and curb ramps, and **Table 5** provides the condition index and ranking criteria for 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 except for 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 cross streets) and their associated curb ramps. 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 the tables in **Section 3.7**. 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.

3.7 Prioritization

The following sections outline the prioritization factors and results of the prioritization for buildings, parks, sidewalks, and curb ramps at intersections. Access to parking is generally considered a high priority under the ADA and Department of Justice factors, therefore, findings associated with on-street parking corridors are not individually prioritized. 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.

3.7.1 Prioritization Factors for Facilities

Buildings and parks are prioritized on a 12-point scale, which is defined in **Table 3**. 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, curb ramps, and paths of travel through driveways and cross streets are 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 4**. 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 5**.

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Table 3. Prioritization Factors for Buildings/Parks

Priority	Criteria
1 (high)	Complaint known or imminent danger present
2 (high)	<ul style="list-style-type: none"> • 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 another pedestrian attractor.
3 (high)	<ul style="list-style-type: none"> • 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 another 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: <ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> • 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)	<ul style="list-style-type: none"> • 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 4. Prioritization Factors for Sidewalk Corridors and Curb Ramps

Criteria	Description	Priority		
		1 (Severe)	2 (Moderate)	3 (Slight)
Heave	Sidewalk/ramp or multiple slabs have uplifted over a short length	> 5" over 5' (> 8%)	2.5" to 5" over 5' (4% to 8%)	0" to 2.5" over 5' (4%)
Sag	Sidewalk/ramp or multiple slabs have settled over a short length	> 5" over 5' (> 8%) Will pond up to 2.5"	2.5" to 5" over 5' (4% to 8%) May pond up to 5"	0" to 2.5" over 5' (4%) May pond up to 2.5"
Tilt	Sidewalk/ramp or multiple slabs have tilted over a short length	> 4% (> 1" over 2')	2% to 4% (1/2" to 1" over 2')	0% to 2% (1/2" over 2')
Shattered Slab	Slab/walk/ramp have two or more cracks and may be associated with settlement	Cracks > 1", noticeable settlement	Cracks 1/4" to 1", slight settlement	Slab still flat, cracks < 1/4"
Transverse Crack	A crack across the width of a slab/walk/ramp	Cracks > 1", noticeable displacement	Cracks 1/4" to 1", slight displacement	Slab still flat, cracks < 1/4"
Longitudinal Crack	A crack along the length of a slab/walk/ramp	Cracks > 1", noticeable displacement	Cracks 1/4" to 1", slight displacement	Slab still flat, cracks < 1/4"
Fault	Vertical displacement at a joint or crack (either up or down)	> 1"	1/2" to 1"	< 1/2"
Texture	Loss of fines, crazing, pop outs or scaling of the sidewalk/ramp surface	The surface texture is rough - aggregate exposed almost like gravel, small wheels stop rolling	Surface has lost its fines, aggregate exposed, small wheels will jam while rolling	Surface is just starting to lose its smooth texture, slight exposing of aggregate - still suitable for small wheels
Corner Break	The corner of a slab/ramp (greater than a 6-square inch area) has broken off or edge of walk has become ragged	Cracks > 1", noticeable settlement, edge is jagged and failed	Cracks 1/4" to 1", slight settlement, edge noticeably deteriorated	Slab still flat, cracks < 1/4", edge slightly deteriorated
Joint Damage	The joints have opened or loss of joint sealant	Joint is opened > 2" and weeded	Joint is opened 1" to 2" and weeded	Joint is opened up to 1"
Patching	The sidewalk/ramp has been patched or cut and patched	Patch has dropped or heaved, failed, very rough and will trap small wheels	Patch is starting to fail, rough or made from dissimilar material	Patch is smooth matching sidewalk surface and made of similar material
Slope	The sidewalk/ramp has excessive slope	> 12.5% slope 3" in 2'	8.33% to 12.5% 2" to 3" in 2'	Up to 8.33% slope Up to 2" in 2'



Table 5. Condition Index Rating for Sidewalk Corridors and Unsignalized Intersection Curb Ramps

Condition Rating (Priority)	Condition Index Range
Excellent	$90 \leq \text{Condition Index} \leq 100$
Very Good	$80 \leq \text{Condition Index} < 90$
Good	$70 \leq \text{Condition Index} < 80$
Fair	$60 \leq \text{Condition Index} < 70$
Marginal	$40 \leq \text{Condition Index} < 60$
Poor	$20 \leq \text{Condition Index} < 40$
Very Poor	$0 \leq \text{Condition Index} < 20$

3.8 Action Log

As the evaluations are completed, the City will institute an ADA Action Log to confirm follow-up on corrective actions required under the Transition Plan and document City 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. The ADA Action Log will be updated on an annual basis and should be available to the public upon request. See example of ADA Action Log provided in **Appendix F**.

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4.0 Funding Opportunities

Several alternative funding sources are available to the City to complete the improvements in this Transition Plan. The 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.

4.1 Federal and State Funding

Table 6 depicts the various types of federal and state funding available for the City to apply for funding for various improvements. The following agencies and funding options are represented in the chart.

- BUILD – Better Utilizing Investments to Leverage Development Transportation Discretionary Grants
- INFRA – Infrastructure for Rebuilding America Discretionary Grant Program
- TIFIA – Transportation Infrastructure Finance and Innovation Act (loans)
- FTA – Federal Transit Administration Capital Funds
- ATI – Associated Transit Improvement (1% set-aside of FTA)
- CMAQ – Congestion Mitigation and Air Quality Improvement Program
- HSIP – Highway Safety Improvement Program
- NHPP – National Highway Performance Program
- STBG – Surface Transportation Block Grant Program
- TA – Transportation Alternatives Set-Aside (formerly Transportation Alternatives Program)
- RTP – Recreational Trails Program
- SRTS – Safe Routes to School Program / Activities
- PLAN – Statewide Planning and Research (SPR) or Metropolitan Planning funds
- NHTSA 405 – National Priority Safety Programs (Nonmotorized safety)
- FLTTP – Federal Lands and Tribal Transportation Programs (Federal Lands Access Program, Federal Lands Transportation Program, Tribal Transportation Program, Nationally Significant Federal Lands and Tribal Projects)

Most of these programs are competitive type grants; therefore, the City of Boca Raton is not guaranteed to receive these funds. It will be important for the City to track these programs to apply for the funds. Federal-aid funding programs have specific requirements that projects must meet, and eligibility must be determined on a case-by-case basis.

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Table 6. Funding Opportunities

ACTIVITY	BUILD	INFRA	TIFIA	FTA	ATI	CMAQ	HSIP	NHPP	STBG	TA	RTP	SRTS	PLAN	NHTS	FLTP
Access enhancements to public transportation	X	X	X	X	X	X		X	X	X					X
ADA/504 Self-Evaluation / Transition Plan									X	X	X		X		X
Bus shelters and benches	X	X	X	X	X	X		X	X	X					X
Coordinator positions (state or local)						X			X	X		X			
Crosswalks (new or retrofit)	X	X	X	X	X	X	X	X	X	X	X	X			X
Curb cut and ramps	X	X	X	X	X	X	X	X	X	X	X	X			X
Paved shoulders for pedestrian use	X	X	X			X	X	X	X	X		X			X
Pedestrian plans				X					X	X		X	X		X
Recreational trails	X	X	X						X	X	X				X
Shared use paths / transportation trails	X	X	X	X	X	X	X	X	X	X	X	X			X
Sidewalk (new or retrofit)	X	X	X	X	X	X	X	X	X	X	X	X			X
Signs / signals / signal improvements	X	X	X	X	X	X	X	X	X	X		X			X
Signed pedestrian routes	X	X	X	X	X	X		X	X	X		X			X
Spot improvement programs	X	X	X	X			X	X	X	X	X	X			X
Stormwater impacts related to pedestrian projects	X	X	X	X	X		X	X	X	X	X	X			X
Trail bridges	X	X	X			X	X	X	X	X	X	X			X
Trail / highway intersections	X	X	X			X	X	X	X	X	X	X			X
Trailside and trailhead facilities	X	X	X						X	X	X				X
Training						X	X		X	X	X	X	X	X	
Tunnels / undercrossings for pedestrians	X	X	X	X	X	X	X	X	X	X	X	X			X

Adapted from FHWA Pedestrian and Bicycle Funding Opportunities, Revised August 9, 2018:
https://www.fhwa.dot.gov/environment/bicycle_pedestrian/funding/funding_opportunities.cfm



4.2 Local Funding

There are several local funding options for the City to consider, 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) is 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

4.3 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, it is important for the City to require private developers to improve pedestrian facilities to current ADA requirements, whether it by new development or redevelopment of an existing property.

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5.0 Next Steps

This document serves as the Americans with Disabilities Act (ADA) Transition Plan for the City of Boca Raton. The City intends to complete the Self-Evaluation of programs, services, activities, and facilities identified in this document over the next five (5) years. The City will try to increase the annual Self-Evaluation budget in future years to potentially shorten the anticipated completion schedule.

The next steps for the City of Boca Raton are:

1. Develop an Action Plan for completing a Self-Evaluation for all City programs, services, activities, and facilities. The first phase will begin in fiscal year 2021 to begin evaluation of pedestrian facilities in the public rights-of-way.
2. Complete a Self-Evaluation for all City programs, services, activities, and 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 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.
3. Develop an Implementation Plan, including schedule for completing the recommended facility improvements and funding sources to be used.
4. 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.
5. Continue to update the City's ADA Transition Plan as projects are implemented and citizen requests/complaints are received.
6. Determine the best approach for receiving public input on the ADA Transition Plan.

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Appendix

Appendix A: Public Outreach

ADA Public Access Survey Feedback Summary

Appendix B: Grievance Procedure and ADA Public Notice

Title II Grievance Procedure

Title II Grievance Form

ADA Public Notice

Appendix C: Federal Highway Administration ADA Transition Plan Process Memo

Appendix D: Design Standard Review

Appendix E: Facility Inventory Maps

Signalized Intersections

Public Rights-of-Way Sidewalk Corridors and Railroad Crossings

Transit Stops

On-Street Parking

Appendix F: Sample Action Log