



City of Lakeland

ADA Transition Plan

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1.0 Introduction

1.1 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 Lakeland has undertaken a comprehensive evaluation of its PSAs and facilities to determine the extent to which individuals with disabilities may be restricted in their access.

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

The City of Lakeland is obligated to observe all requirements of Title I in its employment practices; Title II in its programs, services, and activities; 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 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 select City of Lakeland PSAs and facilities, provides recommendations to remove programmatic barriers, and presents a Transition Plan for the modification of facilities within the public rights-of way to improve accessibility, which will guide the planning and implementation of necessary program and facility modifications over the next 10 years.

The evaluation of City programs, services, activities, and facilities not included in this phase of the project and are recommended to be evaluated in a future phase. 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 of its citizens.

1.3 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 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:

1.3.1 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

1.3.2 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

1.4 Ongoing Accessibility Improvements

City PSAs and facilities evaluated during the first phase of the Self-Evaluation will continue to be evaluated on an ongoing basis, and the ADA Transition Plan should be revised to account for changes since the initial Self-Evaluation. This Plan will be available for review and consideration by the public. In addition, notice will be provided of the Plan's existence in any official and unofficial City publications.

1.5 City of Lakeland Approach

The purpose of the Transition Plan is to provide the framework for achieving equal access to the City of Lakeland's programs, services, activities, and facilities within a reasonable timeframe. The City's elected officials and staff believe accommodating people with disabilities is essential to good customer service, the quality of life City of Lakeland residents seek to enjoy, and to provide effective governance. This Plan has been prepared after careful evaluation of select City programs, services, activities, and facilities.

The City of Lakeland has set up an ADA Specialist system to better cover the needs of employees and citizens with disabilities. In addition to the City's ADA Specialist, the City has identified an ADA Specialist Liaison within each department who reports to the City's ADA Specialist regarding the needs of their department and the programs that department is responsible for managing. The City's ADA Specialist, or designee, will follow-up with each departmental ADA Liaison to coordinate the implementation of recommendations provided in this Transition Plan.

The City of Lakeland shall 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 would fundamentally alter the nature of the program, service, or activity. The City of Lakeland will not place surcharges on individuals with disabilities to cover the cost involved in making PSAs accessible.

2.0 Public Outreach

The City provided opportunities to receive input from the public concerning this Transition Plan. The following section details these conversations with the public.

As the City moves forward with additional Self-Evaluation phases, the City will continue to solicit feedback from the public on the Transition Plan.

2.1 Alliance on Disability Meeting

The City hosted a meeting with the Alliance on Disability (a.k.a., Lakeland Alliance for Accessibility) on October 25, 2016 at 1:30 PM, to provide a summary of the project goals and objects, ADA requirements, project scope, and common issues found during the Self-Evaluation. The members of the Alliance provided feedback on the efforts completed to-date and the planned public workshops.

2.2 Public Meeting

The City hosted two public meetings on January 9, 2017, one at 10:00 AM and a second at 5:30 PM, to provide a summary of the Transition Plan and receive feedback on the Transition Planning process and any other concerns related to accessibility. The questions and comments received at the workshops are summarized below.

Discussion Items

- Parking
 - Special event parking – providing sufficient/accessible parking in the right locations
 - Contract language relative to ADA/accessible parking/access to lease for special events
 - Lift Van needs additional space
- Airport
 - Special event parking – providing sufficient/accessible parking in the right locations
 - Contract language relative to ADA/accessible parking/access to goods and services
- Transit service
 - Could hearing impaired Loops be provided?
- Funding Sources for Repairs?
- Pedestrian signal clearance times
 - City needs to make sure the times are correct
 - City to evaluate audible pedestrian signals at intersections
- Polk Transportation Disadvantaged Coordinating Board is available for assistance
- Peterson Building: Restrooms are inaccessible
- Lakeland Center
 - Restrooms are inaccessible
 - Bathroom stall doors are non-compliant
 - Tissue placement difficult for power chair users
- Better enforcement needed
- Ensure accessible route provided from public sidewalk to new construction
- Lake Hunter: Several locations where sidewalk repairs are needed
- Lake Morton
 - Curb cuts: Only two on all of Lake Morton
 - Mayfair event needs better access

- No sidewalk around lake
- Sidewalks – garbage cans/vegetation create obstructions throughout the City
- Polk Theater: Lamp pole is located within the sidewalk and results in inadequate clearance
- Heavy doors on public buildings are too difficult to open
- Center for Autism and Related Disabilities
 - Program review
 - Training available
- Gandy Pool
 - Accessible restrooms
 - Chairlift is wonderful but poor design to location
 - Slideboard unable to be utilized, pool lip is 4-5"
 - Seek input from users
- New Jersey Rd., south of E. Edgewood Dr. near Glendale: Repairs needed along several curb ramps
- City needs to install accessible pedestrian signals at signalized intersections
- City to fix access curb ramps during resurfacing activities
- Harry's Seafood Bar & Grille: Sidewalk furniture blocks the path of travel
- Post Office (210 N. Missouri Ave.): sidewalk is in poor shape
- 500 block of Florida Ave. S. at Gaslight Tattoo Company/CenterState Bank: sidewalk has slope and width issues
- Southside Cleaners at Florida Ave. S. and Frank Lloyd Wright Way: Sidewalk has slope and width issues
- Bartow Rd. at Grove Park Shopping Center: inaccessible transit stop along northbound route
- SR 33 (Lakeland Hills Blvd.) at Melody Ln./Old Combee Rd.: Crosswalk on west side of intersection has a right-on-red conflict with vehicles
- Customer service (Lakeland Electric) need to provide textable communication options
- City of Lakeland website
 - Accessibility to website should be reviewed/improved
 - Need additional/alternative options to website access – "not computer literate"
- Red Door (733 E. Palmetto St.): location is not accessible
- Lakeland Police Department: needs help on the use of sign language interpreters
- Better communication of public meeting notices
- General Audience Comment – Lakeland very in tune and supportive of needs

Comment Forms

- Lakeland Community Theater
 - Needs handicap accessibility to stage for actors.
 - Not very accessible for people with disability who want to be actors or actresses.
- Please put more notices out about public meeting in newspaper, internet, or emails.
- Have Susan send transcript so can forward to Community.
- Post Office (210 N. Missouri Ave.): Sidewalk in front has slope issue
- My Cottage Garden (325 N. Kentucky Ave.): bathroom door not accessible
- Lakeside Village Shopping Mall (1479 Town Center Dr.): Door openers
- Lighthouse for the Blind will assist the City with training and interpretation of standards
- Is this the 2012 Accessibility Code the current standard?
- Thank you so much for providing this forum!

- Signalized intersection used by 128 Intellectual/Developmental Disabilities (IDD) individuals (some in wheelchairs) living at the Villages at Noah's Landing
- Melody Ln./Combee Rd. and Highway 33: SR 33 (Lakeland Hills Blvd.) at Melody Ln./Old Combee Rd.: Possibly add cautionary signs or no right turn on red signs coming south on Combee Rd. (motorists turn directly into the crosswalk and are looking to their left for on-coming traffic)

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3.0 Self-Evaluation and Summary of Findings

3.1 Grievance Procedure and Grievance Form

Local governments with 50 or more employees are required to adopt and publish grievance procedures for Title II complaints. A grievance form is not required by the Department of Justice, but a form can be an effective tool to aid in the collection of information needed to address a complaint. Title II does not specify what must be included in a grievance procedure, but the Department of Justice has developed a model grievance procedure that can be used as a starting point. Per the Department of Justice, the grievance procedure should include the following elements:

- 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.

Self-Evaluation Findings

The City of Lakeland currently has a grievance procedure and grievance form, both of which are available on the City's website. However, the website does not state if the grievance form is available in alternate formats and how to obtain these. The website has the words "The complaint" hyperlinked to navigate to the grievance form, which could potentially be confusing for someone who is looking for the form. There is also no mention of how to file an appeal or how long complaint files will be retained. The grievance form appears to be for Title VI only and does not ask questions relevant to Title II. Copies of the current grievance process and form are provided in the Appendix.

Recommended Actions

The grievance procedure and form should be made available in alternate formats and information on how to obtain these alternate formats should be added to the website. The existing grievance form hyperlink within the text "The complaint" should be removed and a new statement should be added. For example, "A copy of the complaint form can be downloaded by clicking here: "Title II Complaint Form" and hyperlink "Title II Complaint Form". Information about the appeal process and how long complaint files will be retained should be added to the procedure. The grievance form should be updated to collect information on Title II complaints. A sample Title II grievance form is provided in the Appendix.

3.2 City Ordinance Review

The City of Lakeland Ordinances related to pedestrian facilities in the public right-of-way were identified and reviewed for accessibility. The City Ordinances reviewed included:

- Chapter 86 – Solid Waste, Article II, Section 86-34 Location of garbage cans and recycling bins
- Chapter 90 – Streets and Sidewalks
- Chapter 98 – Traffic and Vehicles

Ordinances were downloaded from: https://www.municode.com/library/fl/lakeland/codes/code_of_ordinances

Self-Evaluation Findings

- Chapter 86
 - Article II, Section 86-34: No issues were identified and this section already mentions that no cans or bins shall be placed within the pedestrian path of travel.
- Chapter 90
 - Article I, Section 90-1 (b) (5): When the City Manager or designee authorizes the temporary or periodic placement of objects and/or merchandise for sale within the sidewalk area of the public right-of-way, minimum accessible route requirements should be maintained. If the minimum accessible route cannot be maintained, a pedestrian detour route (consistent with the MUTCD and PROWAG) should be implemented for the duration that the obstruction is in place. There is no mention of these stipulations in the ordinance.
- Chapter 98
 - Article I, Section 98-8 (b) (6): When shoreline parking is permitted by the chief of police during a special event, accessible parking spaces and an access route to the event must be provided. There is not mention of accessible parking with respect to events that may require shoreline parking.
 - Article II, Section 98-37 (b): This ordinance does not require private property owners to erect a sign to designate accessible parking spaces or designate accessible parking spaces. If the private property owners operate businesses open to the public on their property, parking must comply with the 2010 ADA Standards.

Recommended Actions

- Chapter 90
 - Article I, Section 90-1 (b) (5): Language should be added stating that when the City Manager or designee authorizes the temporary or periodic placement of objects and/or merchandise for sale within the sidewalk area of the public right-of-way, minimum accessible route requirements should be maintained. If the minimum accessible route cannot be maintained, a pedestrian detour route (consistent with the MUTCD and PROWAG) should be implemented for the duration that the obstruction is in place.
- Chapter 98
 - Article I, Section 98-8 (b) (6): The City should confirm, prior to approving the parking application form, that there is accessible parking available in the vicinity of the event when shoreline parking is required.
 - Article II, Section 98-37 (b): The City should require all business property owners to comply with the 2010 ADA Standards with respect to accessible parking requirements.

3.3 Standard Construction Detail Review

The City of Lakeland Standard Construction Details Volume 2: Public Works (Revised April 18, 2016) were reviewed for compliance with the 2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG).

Self-Evaluation Findings

Common findings on the reviewed details include inconsistent labeling of cross slopes for pedestrian paths of travel, lack of guidance for the design of pedestrian street crossings, and missing boarding and alighting area (“deployment

pad') requirements for transit stops. Redlines and a summary of deviations from the 2011 PROWAG are provided in the Appendix.

Recommended Actions

It is recommended that the 2011 PROWAG be adopted by the City and utilized for the design, review, and construction of facilities within the public right-of-way. A summary of recommended changes to the City Standard Construction Details is provided in the Appendix.

3.4 Facilities Review

In 2016, the City of Lakeland conducted an evaluation of select signalized intersections and sidewalk corridors (including all adjacent cross streets and driveways) to provide the City an overview of the physical barriers that prevent people with disabilities from using its facilities.

The infrastructure evaluation process was accomplished using field crews equipped with measuring devices and Global Position System (GPS) based data collection forms. The evaluations identified physical barriers in City facilities based on the 2010 ADA Standards and Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG). Detailed measurements of the existing conditions, planning-level recommendations for removing the physical barriers, and photos of each facility were recorded during the evaluation process and were included in the facility reports. Field crews also noted if the specific facility was near a significant pedestrian attractor (e.g., government office, medical facility, school, etc.). This additional information assisted the Consultant and City staff in prioritizing barriers for removal. All data collected is compatible with the City's existing Geographic Information Systems (GIS) database.

Summary reports were developed for each facility type to document the findings of the evaluations. The reports identify the compliance status of each facility with regard to federal standards and include the following elements:

- Listing of facilities that are in compliance with current ADA standards;
- Listing of facilities that are not in compliance with current ADA requirements;
- Recommended actions to resolve non-compliance issues for each facility;
- Prioritized list of improvements using criterion developed by the Consultant and City staff;
- "Cost report" that assigns conceptual budget estimates to each recommended action; and
- Photolog summary for signalized and unsignalized intersections, and issues along sidewalk corridors (sidewalk photos provided in the GIS database only).

Copies of the evaluation reports are provided in the Appendix.

3.4.1 Signalized Intersections

Fifteen (15) signalized intersections within the City of Lakeland were identified and evaluated as part of this project. Signalized intersection evaluations cataloged 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. All signalized intersections included in the evaluation are shown on a map included in the Appendix.

Self-Evaluation Findings

Common curb ramp issues included non-flush transitions from ramp to roadway, no presence of color or texture contrast, excessive landing running and cross slopes, and excessive curb ramp running slopes and cross slopes. Table 1 provides a summary of the curb ramp issues at signalized intersections.

About 15 percent of pedestrian crossings, where pedestrians are either being accommodated or should be accommodated, at signalized intersections did not have pedestrian push buttons installed where necessary and about ten (10) percent did not have pedestrian signal heads. Pedestrian push buttons and signal heads were recommended to be installed at all signalized intersection pedestrian crossings where they did not exist where pedestrians are either being accommodated or should be accommodated. Common issues associated with the existing pedestrian push buttons included non-parallel orientations of push buttons, excessive push button clear floor running slopes and cross slopes, and push buttons installed at locations inconsistent with the current *Manual on Uniform Traffic Control Devices (MUTCD)* guidance. Table 2 provides a summary of the push button issues.

Table 1. Summary of Curb Ramp Issues at Signalized Intersections

Curb Ramp Issue	Number Evaluated	Number Non-Compliant	Percent Non-Compliant
No flush transition to roadway	64	43	67.2%
No color contrast	64	40	62.5%
Landing running slope > 2%	50	24	48.0%
Ramp running slope > 8.3%	64	30	46.9%
No texture contrast	64	26	40.6%
Landing cross slope > 2%	50	16	32.0%
Ramp cross slope > 2%	64	19	29.7%
Flare cross slope > 10%	59	17	28.8%
No landing	64	14	21.9%
Ramp counter slope > 5%	64	14	21.9%
Obstruction in ramp, landing, or flares	64	13	20.3%
Ponding in ramp, landing, or flares	64	11	17.2%
Ramp width < 48"	64	5	7.8%
No ramp where ramp is needed	67	3	4.5%
No 48" crosswalk extension	42	1	2.4%
Ramp does not land in crosswalk	64	1	1.6%
Traversable sides	5	0	0.0%
Curbed sides < 90°	64	0	0.0%

Table 2. Summary of Push Button Issues

Push Button Issue	Number Evaluated	Number Non-Compliant	Percent Non-Compliant
Push button orientation not parallel	26	16	61.5%
Clear floor space running slope > 2%	26	13	50.0%
Clear floor space cross slope > 2%	26	8	30.8%
Push button offset from curb > 10'	26	6	23.1%
Missing push button where push button is needed	122	20	16.4%
Push button diameter not 2"	26	3	11.5%
Missing pedestrian head where pedestrian head is needed	122	11	9.0%
Push button offset from crosswalk > 5'	26	2	7.7%
Push button height > 48"	26	2	7.7%
No clear floor space or no access	26	0	0.0%

Recommended Actions

Detailed recommendations for each signalized intersection are provided in the facility reports in the Appendix.

3.4.2 Sidewalk Corridors

The sidewalk corridor evaluations documented 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. Approximately 8.1 miles of sidewalk were evaluated as part of this project. The evaluated sidewalk corridors were selected due to their high level of pedestrian activity as well as their proximity to pedestrian traffic generators. Future phases of the ADA Transition Plan are expected to complete evaluations for the remainder of the sidewalk, with arterial sidewalk evaluated first, followed by collector and local road sidewalk. A map of the evaluated sidewalk corridors is included in the Appendix.

Self-Evaluation Findings

Common issues along the sidewalk corridors included 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 Lakeland may find additional issues with the sidewalk once the temporary obstruction is removed.

Common curb ramp issues at unsignalized intersections along the sidewalk corridors included non-flush transitions from ramp to roadway, excessive flare cross slopes, excessive curb ramp cross slopes, and excessive landing cross slopes. A summary of the unsignalized intersection curb ramp issues is provided in Table 3. Non-compliant curb ramps, sidewalk, and pedestrian paths of travel along driveways and street crossings at unsignalized interactions were recommended to be removed and replaced. Where sidewalk leads up to the curb at an intersection, both parallel and perpendicular to the project corridor, curb ramps were recommended to be installed. Where sidewalk parallel to the project corridor leads up to the curb at a driveway, curbs ramps were recommended to be installed.

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 Section 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.”

Recommended Actions

Detailed recommendations for each sidewalk corridor and unsignalized intersection are provided in the sidewalk and unsignalized intersection reports in the Appendix.

Table 3. Summary of Curb Ramp Issues at Unsignalized Intersections

Curb Ramp Issue	Number Evaluated	Number Non-Compliant	Percent Non-Compliant
No flush transition to roadway	190	108	56.8%
Flare cross slope > 10%	142	78	54.9%
Ramp cross slope > 2%	190	98	51.6%
Landing cross slope > 2%	163	62	38.0%
Ramp running slope > 8.3%	190	72	37.9%
Landing running slope > 2%	163	57	35.0%
No ramp where ramp is needed	369	116	31.4%
No color contrast	190	59	31.1%
No texture contrast	190	59	31.1%
No 48" crosswalk extension	46	11	23.9%
Ramp width < 48"	190	31	16.3%
Ponding in ramp, landing, or flares	190	30	15.8%
No landing	190	27	14.2%
Obstruction in ramp, landing, or flares	190	25	13.2%
Ramp counter slope > 5%	190	16	8.4%
Ramp does not land in crosswalk	190	7	3.7%
Traversable sides	48	0	0.0%
Curbed sides < 90°	190	0	0.0%

3.5 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 be disseminated to the appropriate City of Lakeland staff for when a curb ramp installation is required as part of a project.

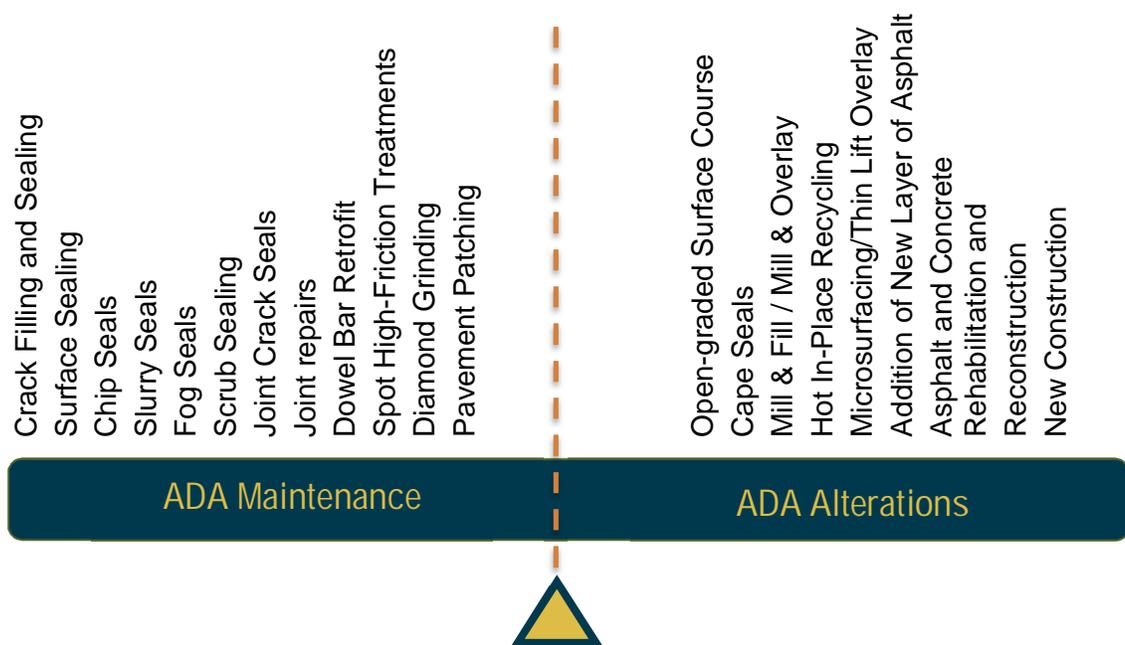
The Americans with Disabilities Act of 1990 (ADA) is a civil rights statute prohibiting discrimination against persons with disabilities in all aspects of life, including transportation, based on regulations promulgated by the United States Department of Justice (DOJ). DOJ's regulations require accessible 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 have the opportunity to 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



Source: DOJ Briefing Memorandum on Maintenance versus Alteration Projects

3.6 FHWA Guidance on Closing Pedestrian Crossings

The FHWA has provided guidance on closing pedestrian crossings. 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 Lakeland should develop and implement a policy on how to close pedestrian crossings that are currently 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 currently serving the crossing), but should not be accommodated due to safety concerns.

3.7 Prioritization

The following sections outline the prioritization factors and results of the prioritization for signalized intersections, sidewalks, and unsignalized 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.

3.7.1 Prioritization Factors for Facilities

Intersections were prioritized on a 13-point scale. The 13-point scale, which is used to prioritize both signalized and unsignalized intersections, is defined in Table 4. This prioritization methodology has been developed by the Consultant staff to aid the City in determining which intersections should be prioritized for improvements over other intersections based on the severity of non-compliance with ADA.

Sidewalk corridors were prioritized on a 3-point scale and were given a priority of either "High", "Medium", "Low" based on the severity of non-compliance, which is defined in Table 5. Compliant segments of the sidewalk corridor were given a priority label of "Compliant".

Table 6, Table 7, and Table 8 provide summaries of the prioritization classifications for signalized intersections, sidewalks, and unsignalized intersections, respectively.

Table 4. Prioritization Factors for Signalized and Unsignalized Intersections

Priority	Criteria
1 (high)	Complaint filed on curb ramp or intersection or known accident/injury at site
2 (high)	Existing curb ramp with any of the following conditions: <ul style="list-style-type: none"> • Running slope > 12% • Cross slope > 7% • Obstruction to or in the ramp or landing • Level change > ¼ inch at the bottom of the curb ramp • No detectable warnings AND within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
3 (high)	<ul style="list-style-type: none"> • No curb ramp where sidewalk or pedestrian path exists AND within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
4 (high)	No curb ramps but striped crosswalk exists
5 (medium)	Existing curb ramp with any of the following conditions: <ul style="list-style-type: none"> • Running slope > 12% • Cross slope > 7% • Obstruction to or in the ramp or landing • Level change > ¼ inch at the bottom of the curb ramp • No detectable warnings AND NOT within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
6 (medium)	<ul style="list-style-type: none"> • No curb ramp where sidewalk or pedestrian path exists AND NOT within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
7 (medium)	One curb ramp per corner and another is needed to serve the other crossing direction
8 (medium)	Existing curb ramp with any of the following conditions: <ul style="list-style-type: none"> • Cross slope > 5% • Width < 36 inches • Median/island crossings that are inaccessible
9 (low)	Existing curb ramp with either running slope between 8.3% and 11.9% or insufficient landing
10 (low)	Existing diagonal curb ramp without a 48-inch extension in the crosswalk
11 (low)	Existing pedestrian push button is not accessible from the sidewalk and/or ramp
12 (low)	Existing curb ramp with returned curbs where pedestrian travel across the curb is not protected
13 (low)	All other intersections not prioritized above

Table 5. Prioritization Factors for Sidewalk Corridors

Criteria	Priority		
	1 (high)	2 (medium)	3 (low)
Cross slope of sidewalk is greater than 2%	Value > 3.5	3.5 ≥ Value > 2.0	
Width of sidewalk is less than 48 inches	Value ≤ 36.0	36.0 < Value < 42.0	42.0 < Value < 48.0
Obstruction present along sidewalk	Obstruction - Permanent	Obstruction - Temporary	
Heaving, Sinking, or Cracking present on sidewalk	Heaving Sinking Cracking		
Ponding on sidewalk		Ponding	
Missing Sidewalk			Missing Sidewalk
Signalized cross street cross slope is greater than 5%	Value > 9.0	9.0 ≥ Value ≥ 7.0	7.0 > Value > 5.0
Unsignalized cross street cross slope is greater than 2%	Value > 6.0	6.0 ≥ Value ≥ 4.0	4.0 > Value > 2.0
Cross street running slope is greater than 5%	Value > 7.0	7.0 ≥ Value ≥ 6.0	6.0 > Value > 5.0
Driveway sidewalk width is less than 48 inches	Value ≤ 36.0	36.0 < Value < 42.0	42.0 < Value < 48.0
Driveway (or sidewalk if applicable) cross slope is greater than 2%	Value > 6.0	6.0 ≥ Value ≥ 4.0	4.0 > Value > 2.0
Driveway (or sidewalk if applicable) condition is poor or poor dangerous	Poor-Dangerous (elevation change greater than ½ inch or gaps greater than 1 inch)	Poor (elevation change between ¼ inch and ½ inch or gaps between ½ inch and 1 inch)	

Table 6. Prioritization Summary for Signalized Intersections

Priority	Number of Intersections
1 (high)	-
2 (high)	11
3 (high)	-
4 (high)	-
5 (medium)	4
6 (medium)	-
7 (medium)	-
8 (medium)	-
9 (low)	-
10 (low)	-
11 (low)	-
12 (low)	-
13 (low)	-
Total	15

Table 7. Prioritization Summary for Sidewalk Corridors

Line Type	Length (miles) by Priority					
	1 (high)	2 (medium)	3 (low)	Compliant	Not Prioritized	Total
Sidewalk Line	0.87	1.62	0.01	2.79	-	5.29
Sidewalk Issues (including missing sidewalk)	0.74	0.02	0.01	-	0.01	0.78
Driveways	0.53	0.17	0.17	0.20	-	1.07
Cross Streets	0.06	0.13	0.20	0.60	-	0.99
Total	2.20	1.94	0.39	3.59	0.01	8.13

Table 8. Prioritization Summary for Unsignalized Intersections

Priority	Number of Intersections
1 (high)	-
2 (high)	33
3 (high)	17
4 (high)	-
5 (medium)	29
6 (medium)	27
7 (medium)	1
8 (medium)	-
9 (low)	-
10 (low)	-
11 (low)	-
12 (low)	-
13 (low)	1
Total	108

3.8 Conclusion/Action Log

The City is taking the actions referenced below and will continue to look for and remedy barriers to access to ensure that citizens with disabilities in the City of Lakeland are given access to the City's programs, services, and activities.

To confirm follow-up on corrective actions required under the Transition Plan, the City will institute an ADA Action Log, documenting its efforts to comply 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 adoption of the Transition Plan by the governing body of the City, the ADA Action Log will be updated on an annual basis. The ADA Action Log shall be available upon request.

4.0 Facility Costs

4.1 Facilities Cost Projection Overview

To identify funding sources and develop a reasonable implementation schedule, cost projection summaries for the initial study were developed for each facility type. To develop these summaries, recent bid tabulations from Florida Department of Transportation (FDOT) construction projects, along with the Consultant's experience with similar types of projects, were the basis for the unit prices used to calculate the improvement costs. A contingency percentage (20%) was added to the subtotal to account for increases in unit prices in the future in addition to an Engineering design percentage (15%). Table 9 provides a summary of the estimated costs to bring each facility into compliance.

Table 9. Summary of Facility Costs

Facility Type	Priority			Total
	High	Medium	Low	
Signalized Intersections	\$350,000	\$128,000	-	\$478,000
Sidewalk Corridors	\$688,777	\$481,945	\$65,278	\$1,236,000
Unsignalized Intersections	\$619,000	\$526,000	\$1,000	\$1,146,000
City Totals	\$1,657,777	\$1,135,945	\$66,278	\$2,860,000

4.2 Implementation Schedule

Table 10 details the barrier removal costs and proposed implementation schedule by facility type for all facilities evaluated as part of this project. This 10-year plan will serve as the implementation schedule for the Transition Plan. The City of Lakeland 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 Specialist work together with department heads and budget staff to determine the funding sources for barrier removal projects. Once funding is identified, the ADA Specialist will coordinate the placement of the projects in the Capital Improvement Program to be addressed on a fiscal year basis.

Table 10. Implementation Schedule

Facility Type	Estimated Cost	Implementation Schedule (years)	Approximate Annual Budget
Signalized Intersections	\$478,000	10	\$47,800
Sidewalk Corridors	\$1,236,000	10	\$123,600
Unsignalized Intersections	\$1,146,000	10	\$114,600
City Totals	\$2,860,000		
Total Annual Budget			\$286,000

4.3 Recent Projects

The City has either completed or is currently working on several projects to help improve accessibility throughout the City.

Fiscal Year 2017 Projects:

- City Commission Chambers – Configured the City Commission dais to meet ADA standards. Created ramps for dais and platform access. Created additional ADA seating areas. Installed hearing loops to bring up to code.
- Lake Mirror Auditorium – Installed ADA access to the auditorium stage by installing a wheelchair lift.
- Orange and Main Street Garage Parking Spaces – ADA upgrade of the accessible parking spaces, ramps, and total number of spaces to meet code.
- Amtrak Station – Installed handrails bringing them up to ADA code. Traffic coatings and ramp coatings.
- Martin Luther King Jr. Avenue @ Tenth Street – Traffic Operations received a citizen concern noting that one of the pedestrian push-buttons at this intersection was not accessible to disabled individuals utilizing wheel chairs. A retrofit would require relocation of segments of sidewalk and/or pedestal pole. A simple solution was found that no longer requires activation of the pedestrian WALK phase by pushbutton. Instead, the pedestrian walk phase is automatically recalled when the signal cycle terminates and a 5 second “leading pedestrian phase” (LPI) was added that gives all pedestrians an exclusive “WALK” indication while all traffic movements are stopped for enhanced safety at this intersection. This work was performed at minimal cost requiring only a controller programming change.
- Missouri Avenue Streetscape Sidewalk @ Citrus Connection Bus Terminal – Citrus Connection advised us that a short segment of streetscape sidewalk adjacent to a very active transit stop on Missouri Avenue (across the street from the Post Office) has a severe cross-slope and complaints were received by transit patrons. Field reviews confirmed that this streetscape segment does not meet the ADA 2% maximum cross-slope guidelines. The bus wheelchair lift scrapes the sidewalk and a senior citizen using a walker was seen having great difficulties accessing the bus due to these deficiencies. C&M crews removed the original streetscape sidewalk fronting the Citrus Connection bus terminal, installed a new ADA compliant streetscape sidewalk and built a small retaining wall at the back of the sidewalk in order to meet ADA cross-slope requirements.
- Lemon Street Streetscape ADA Concern – Received concern from citizen that the Lemon Street streetscape sidewalk (north side) just west of Massachusetts Avenue is not accessible to disabled persons utilizing a wheel chair. Field reviews confirmed that a tree with a large tree grate behind the concrete curb reduces the accessible sidewalk width to 30”. In lieu of removing the tree, C&M crews removed the tree grate to increase the accessible width to 36” along this sidewalk segment. Rubberized compacted mulch was added around the tree in order to provide an ADA compliant accessible route at the base of the tree.
- South Blvd Pedestrian Mid-Block Crosswalk – This project was constructed at the request of St. Joseph’s Academy. Field reviews confirmed that children, adults and some citizens with disabilities were crossing South Blvd mid-block in front of St. Joseph’s Academy between the visitor/teacher parking lot on the EAST side and the school entrance on the west side. A new marked pedestrian mid-block crosswalk with pedestrian ramps (2) and advanced warning signs was installed to accommodate this concern.
- 47 curb ramps re-constructed to ADA compliance.

Fiscal Year 2016 Projects:

- ADA Transition Plan Self-Evaluation – Inventory and evaluation of 15 signalized intersections and 8 miles of sidewalk
- Sidewalk Replacement – 388 LF of sidewalk replaced to address ADA compliance.
- 132 curb ramps re-constructed to ADA compliance.
- Bryant Stadium South End Zone Seating

- LE Admin Customer Service
- Lake Mirror Auditorium Stage Lift
- Glendale Admin and Warehouse Restrooms

Fiscal Year 2015 Projects:

- 103 curb ramps re-constructed to ADA compliance.
- First floor City Hall Bathrooms
- City Hall Department Reception Counters
- Iowa Garage Parking

4.4 Funding Opportunities

Several alternative funding sources are available to the City to address the issues identified in this Transition Plan, including federal and state funding, local funding, and private funding. The following sections detail some different funding source options.

4.4.1 Federal and State Funding

Table 11 depicts the various types of federal and state funding available for the City to apply for funding for various improvement. The following agencies and funding options are represented in the chart.

- LAP – Local Agency Program (FDOT)
- NHPP – National Highway Performance Program
- STBG – Surface Transportation Block Grant Program
- HSIP – Highway Safety Improvement Program
- RHC – Railway-Highway Crossing Program
- TAP – Transportation Alternatives Program
- CMAQ – Congestion Mitigation/Air Quality Program
- FTA – Federal Transit Capital, Urban & Rural Funds
- RTP – Recreational Trails Program
- BRI – Bridge - Highway Bridge Replacement and Rehabilitation (HBRRP)
- 402 – State and Community Traffic Safety Program
- PLA – State/Metropolitan Planning Funds
- FLH – Federal Lands Highways Program
- SRTS – Safe Routes to School (Moving Ahead for Progress in the 21st Century Act (MAP-21) now under TAP)

Most these programs are competitive type grants; therefore, the City of Lakeland is not guaranteed to receive these funds. It will be important for the City to track these programs to apply for the funds.

Table 11. Funding Opportunities

Activity	NHPP	STBG	HSIP	RHC *	TAP	CMAQ *	FTA	RTP	BRI *	402	PLA	FLH	SRTS
Pedestrian plan		X	X			X					X		
Paved shoulders	X	X	X	X	X	X			X			X	
Shared-use path/trail	X	X	X		X	X		X	X			X	X
Recreational trail								X				X	
Spot improvement program		X	X		X	X							X
Maps		X			X	X				X			X
Trail/highway intersection	X	X	X		X	X		X				X	X
Sidewalks, new or retrofit	X	X	X	X	X	X	X		X			X	X
Crosswalks, new or retrofit	X	X	X	X	X	X	X					X	X
Signal improvements	X	X	X	X	X	X							X
Curb cuts and ramps	X	X	X	X	X	X							X
Traffic calming		X	X	X									X
Safety brochure/book		X			X	X				X			X
Training	X	X	X		X	X		X		X			X

4.4.2 Local Funding

There are several local funding options for the City to consider, including:

- General fund (sales tax and bond issue)
- Allocation of annual departmental budgets – requests for larger share to address needs in a timelier fashion
- Maintenance funds
- Special taxing districts
- 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.
- 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]
- 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 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
- Sidewalk or Access Improvement Fee
- Transportation User Fee
- Scheduled/Funded CIP projects that are funded through bonds and sales tax.
- Community Development Block Grants (CDBG)

4.4.3 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.

4.5 Next Steps

This document serves as the Americans with Disabilities Act (ADA) Transition Plan within the City of Lakeland. In developing this Plan, program, policies and procedures were reviewed for compliance with ADA guidelines and a Self-Evaluation was conducted on the following facilities:

- 15 signalized intersections; and
- 8.1 miles of sidewalk and all unsignalized intersections and driveways along the sidewalk corridors.

The recommended improvements were prioritized and an implementation plan was developed to provide guidance for the City's improvement projects in the coming years. Public outreach was also conducted to aid in the development of the plan.

It should be noted that this Transition Plan is focused on a portion of City of Lakeland facilities, and is not intended to be a comprehensive ADA Transition Plan for all City facilities. As funding becomes available, additional facility evaluations and review of all City programs, services, and activities should be completed to provide a comprehensive Transition Plan for the City of Lakeland.

Appendix

Grievance Process

City of Lakeland Fact Sheet on Non-Discrimination

City of Lakeland Title VI Complaint Form

City of Lakeland ADA Grievance Procedure

City of Lakeland ADA Grievance Form

Standard Construction Detail Review Summary of Comments

Standard Construction Detail Review Redlines

Facility Maps

Signalized Intersections

Sidewalk Corridors

Unsignalized Intersections

Facility Reports

Signalized Intersections

Sidewalk Corridors

Unsignalized Intersections