# Americans with Disabilities Act (ADA) Transition Plan City of Hollywood, Florida February 2022



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## Introduction

## **Transition Plan Need and Purpose**

The <u>Americans with Disabilities Act (ADA)</u> is a civil rights law prohibiting discrimination against individuals on the basis of disability. It was enacted on July 26, 1990 and was amended in 2008 with the ADA Amendments Act (ADAAA). The ADA consists of five titles outlining protections in the following areas:

- Title I. Employment
- Title II. State and local governments
- Title III. Public accommodations
- Tile IV. Telecommunications
- Title V. Miscellaneous Provisions

Title II of ADA pertains to the programs, activities and services provided by public entities. The City of Hollywood must comply with this section of the ADA, as it specifically applies to public service agencies. Title II of ADA states that "no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such entity." (<u>42 USC Sec. 12132</u>; <u>28 CFR Sec. 35.130</u>)

As required by Title II of ADA (<u>28 CFR Part 35 Sec. 35.105 and Sec. 35.150</u>), The City of Hollywood has been conducting self-evaluations of its services, programs, activities, and facilities on public property and within public rights-of-way; and has developed this Transition Plan update detailing the methods to be used to ensure compliance with ADA accessibility requirements. The prioritization methodology for evaluating and implementing improvements was developed based on the applicable 2010 ADA Standards, Title 24 of the 2012 Florida Accessibility Code for Building Construction, 2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG).

## ADA and its Relationship to Other Laws

Title II of ADA is companion legislation to two previous federal statutes and regulations: the <u>Architectural Barriers Act (ABA) of 1968</u> and <u>Section 504 of the Rehabilitation Act of 1973</u>.

The Architectural Barriers Act of 1968 is a federal law that requires facilities designed, built, altered or leased with federal funds to be accessible. The Architectural Barriers Act marks one of the first efforts to ensure access to the built environment.

Section 504 of the Rehabilitation Act of 1973 is a federal law that protects qualified individuals from discrimination based on their disability. The nondiscrimination requirements of the law apply to employers and organizations that receive financial assistance from any federal

department or agency. Title II of ADA extended this coverage to all state and local government entities, regardless of whether they receive federal funding or not.

### **Agency Requirements**

Under Title II, the City of Hollywood must meet these general requirements:

- Must operate their programs so that, when viewed in their entirety, the programs are accessible to and useable by individuals with disabilities [28 CFR Sec. 35.150].
- May not refuse to allow a person with a disability to participate in a service, program or activity simply because the person has a disability [28 CFR Sec. 35.130 (a)].
- Must make reasonable modifications in policies, practices and procedures that deny equal access to individuals with disabilities unless a fundamental alteration in the program would result [<u>28 CFR Sec. 35.130(b)(7)</u>].
- May not provide services or benefits to individuals with disabilities through programs that are separate or different unless the separate or different measures are necessary to ensure that benefits and services are equally effective [28 CFR Sec. 35.130(b)(iv) & (d)].
- Must take appropriate steps to ensure that communications with applicants, participants and members of the public with disabilities are as effective as communications with others [29 CFR Sec. 35.160(a)].
- Must designate at least one responsible employee to coordinate ADA compliance [<u>28</u> <u>CFR Sec. 35.107(a)</u>]. This person is typically referred to as the ADA Coordinator. The public entity must provide the ADA Coordinator's name, office address, and telephone number to all interested individuals [<u>28 CFR Sec. 35.107(a)</u>].
- Must provide notice of ADA requirements. All public entities, regardless of size, must provide information about the rights and protections of Title II to applicants, participants, beneficiaries, employees, and other interested persons [28 CFR Sec. 35.106]. The notice must include the identification of the employee serving as the ADA Coordinator and must provide this information on an ongoing basis [28 CFR Sec. 104.8(a)].
- Must establish a grievance procedure. Public entities must adopt and publish grievance procedures providing for prompt and equitable resolution of complaints [28 CFR Sec. 35.107(b)]. This requirement provides for a timely resolution of all problems or conflicts related to ADA compliance before they escalate to litigation and/or the federal complaint process.

## **Designation of Responsibility**

In accordance with <u>28 CFR 35.107(a)</u>, the City of Hollywood has designated the following person to serve as ADA Title II Coordinator, to oversee the City's policies and procedures:

#### Name: Azita Behmardi, P.E. Job Title: City Engineer

In accordance with <u>28 CFR 35.150(d)(3)</u>, the City of Hollywood has designated the following person to serve as ADA Transition Plan Implementation Coordinator, to monitor the City's progress and manage review and updates of this document:

Name: Mark L. Johnson, P.M.P. Job Title: Project Manager

Contact information is provided in Appendix E.

Training is an important tool for ensuring compliance with ADA requirements. The ADA Coordinators will identify resources and opportunities for agency employees at various levels to receive ADA-related training appropriate to their job functions.

## **Self-Evaluation**

#### **Overview**

Under Title II of the ADA (<u>28 CFR Sec. 35.105</u>), public entities are required to perform a selfevaluation of their current services, policies and practices with regard to accessibility. The goal of the self-evaluation is to verify that, in managing its programs and facilities, the agency is providing accessibility and not adversely affecting the full participation of individuals with disabilities.

The intent of the ADA self-evaluation is to review the agency's entire public program, including all facilities on public property and within public rights-of-way, in order to identify any obstacles or barriers to accessibility that need to be addressed. The general categories of items to be evaluated include:

- Communications, Information, and Facility Signage.
- Building Facilities these include offices, garages and other types of buildings.
- Pedestrian Facilities (Pedestrian Circulation Routes / Pedestrian Access Routes) these include sidewalks, curb ramps, bicycle/pedestrian trails, traffic control signals and bus stops (and/or other transit facilities) that are located within the City rights-of-way.

Public entities are required to provide an opportunity for interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the self-evaluation process by submitting comments [28 CFR Sec. 35.105(b)].

Furthermore, a public entity that employs 50 or more persons is required, for at least three years following the completion of the self-evaluation, to maintain on file and make available for public inspection:

- A list of the interested persons consulted;
- A description of areas examined and any problems identified; and,
- A description of any modifications made.

### **Process & Findings**

Between 2007 and 2021, the City of Hollywood has performed a self-evaluation of its services, programs, activities, and facilities on public property and within public rights-of-way with regard to accessibility. In addition, this plan describes the process that will be used moving forward to complete the Self-Evaluation of the City of Hollywood's programs, services, activities, and facilities. Detailed information regarding inventories and findings from future reviews will be provided in Appendix A, under the headings of Communications (A1), Building Facilities (A2) and Pedestrian Facilities (A3).

An important component of the self-evaluation process is the ADA Team. This team consists of representatives from various city departments such as communications, human resources, design and construction management, development services, public works, and parks and recreation. Their key responsibilities are to help identify obstacles or barriers to accessibility, and the corresponding modifications that will be needed to remedy these items. Progress is reported to the ADA Coordinator on an annual basis.

Disability awareness training will be provided to the ADA Team so they are familiar with the ADA regulations and how to identify ADA barriers to accessibility.

Each identified department is responsible for assigning one or two staff members to serve as ADA Team and work with the ADA Coordinator.

The ADA Coordinator will work with consultants and the Department of Public Works-assigned coordinators and the Parks and Recreation-assigned coordinators to conduct surveys/reviews of all facilities with public access. The ADA Coordinator will coordinate with other departments performing work in the City owned rights-of-way to ensure an obstacles or barriers to accessibility are identified. Any required modifications will be integrated into the project scope of work when feasible.

The ADA Team will perform an annual review of their departments' ADA programs, policies, and practices and provide an update to the ADA Coordinator for inclusion in the Transition Plan update.

The following sections provide a summary of improvements that have already been made, and obstacles that the City plans to address as part of this Transition Plan.

### **Communications, Information & Facility Signage**

Title II of ADA includes the following requirements regarding Communications.

#### General (28 CFR Sec. 35.160)

- A public entity shall take appropriate steps to ensure that communications with applicants, participants, and members of the public with disabilities are as effective as communications with others.
- A public entity shall furnish appropriate auxiliary aids and services where necessary to afford an individual with a disability an equal opportunity to participate in, and enjoy the benefits of, a service, program, or activity conducted by a public entity.
- In determining what type of auxiliary aid and service is necessary, a public entity shall give primary consideration to the requests of the individual with disabilities.

#### Information and Signage (28 CFR Sec. 35.163)

- A public entity shall ensure that interested persons, including persons with impaired vision or hearing, can obtain information as to the existence and location of accessible services, activities, and facilities.
- A public entity shall provide signage at all inaccessible entrances to each of its facilities, directing users to an accessible entrance or to a location at which they can obtain information about accessible facilities. The international symbol for accessibility shall be used at each accessible entrance of a facility.

Other examples of important communication items/devices include <u>Accessible Pedestrian</u> <u>Signals (APS)</u> used at intersections, and signs, pavement markings and other traffic control devices used to provide advance warning and positive guidance in the vicinity of construction, maintenance or utility work areas/zones that impact sidewalks, crosswalks or other pedestrian access routes. The <u>Pedestrian Checklist and Considerations for Temporary Traffic Control Zones</u> provides an overview of pedestrian-related considerations to enhance safety and accessibility for these types of situations. Appendix A3 of this Transition Plan provides additional information about communication items related to Pedestrian Facilities / Public Rights-of-Way.

In recent years, the City has implemented the following accessibility improvements with regard to communications, information and facility signage:

- The City has developed a webpage that provides information on the City's ADA compliance and contact information for the ADA Coordinator.
- The City has developed an ADA Policy and ADA Grievance Procedure.

- In May of 2019, final testing was completed with COMCAST and a closed captioning signal was confirmed. Since then, individuals watching the live meetings on the Government Access Channel can use the CC button on their remote control to activate the captioning option on their television set.
- Meetings viewed online via the City's website, whether live or as an archived video, may also utilize the CC button in the viewer to activate the captioned signal.
- Assisted listening devices were made available upon request at City public meetings.
- The City has implemented an AudioEye application that runs on the City website. The AudioEye tool began scanning the City's main website in July 31, 2019 and completed the scan of the entire site in October 2019. Every page of the site was reviewed and corrected for ADA compliance. The tool remains on the site and provides accessibility options to website visitors.
- The City held multiple trainings over the course of 2019 and into early 2020 with website liaisons on how to save Word documents as ADA accessible PDF documents.
- Moved City videos off the website and onto the City YouTube channel to add closed captioning. Once captioned, embed the videos back on the City website.

The City will continue to conduct a detailed evaluation of its communications, information and facility signage with regard to the ADA Title II requirements 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.

### **Improvement Schedule**

Moving forward, the City of Hollywood plans to implement improvements for the following items that have been identified as potential obstacles to accessibility.

Communications, Information & Facility Signage					
Item/Description	Accessibility Concern	Improvement Method	Schedule	Estimated Cost	
Move away from hosting PDFs on the City website when possible	PDFs must comply with WCAG 2.1 web accessibility guidelines	Work with IT to procure software for stakeholders that would allow for the ability to edit and save compliant Word and PDF documents	Ongoing through FY 2025	TBD	

Item/Description	Accessibility Concern	Improvement Method	Schedule	Estimated Cost
Move away from hosting PDFs on the City website when possible (cont.)	PDFs must comply with WCAG 2.1 web accessibility guidelines	Conduct trainings for website liaisons on how to save Word documents as ADA accessible PDF documents	Ongoing through FY 2025	TBD
Upgrade assistive listening devices at City Hall	Existing equipment was obsolete	Purchased and installed a new assistive listening system in room 219 and 215 Hollywood City Hall	Completed in FY 2021	\$5,960.17
Provide sign language interpreter on request for public meetings	Currently, requests can be made through the Office of the City Clerk, however a sign language interpreter is not currently under contract with the City	Procure a sign language interpreter service provider and enter into a contract on an as- needed basis	FY2023	Estimated at approximately \$75 to \$145 per hour with a minimum of two-hours
Facility signage may be missing in certain facilities	Previous self- assessments conducted were not documented	Perform a self- assessment of all buildings to ensure facility signage is in place	FY2022- FY2023	TBD

## **Building Facilities and Related Parking Lots/Facilities**

The City of Hollywood is responsible for the following buildings/facilities with public access:

Building Name	Location	Year Built	Square footage
City Hall	2600 Hollywood Boulevard	1966	69,886
City Hall Annex	2600 Hollywood Boulevard	1956	18,415
Old Library (IT Building Code Compliance)	2600 Hollywood Boulevard	1958	18,922
Art Cultural Center/Art Center	1650 Harrison Street	1924	10,146
Art Cultural Center/Art School	1650 Harrison Street	1985	1,350
Van Buren Street Parking Garage	251 South 20th Avenue	1996	230,040
Garfield Parking Garage	300 Connecticut Street	2008	138,626
Radius Parking Garage	250 North 19th Avenue	2007	214,324
Nebraska Street Garage	327 Nebraska Street	2019	128,542

In recent years, the City has implemented the following accessibility improvements to its building facilities:

- City Hall public access was provided by closing the main entrance to the general public on the second floor an adding public access to the ground floor with access to elevators.
- Several bathrooms in City buildings with public access have been updated with one ADA compliant area. Additional bathroom areas requiring modification were identified as part of the self-assessment process.
- Adequate accessible parking has been provided at all City buildings with public access.
- Nebraska garage has accessible bathrooms included in the garage.

In the past, the City has conducted a detailed accessibility evaluation of each of its building facilities and related parking lots/areas. In 2021, the City re-evaluated the City Hall Annex to determine assessment protocol for future evaluations. An executive summary of the facility report is provided in the Appendix H.

The City will continue to conduct detailed accessibility evaluations, based on the <u>ADA Checklist</u> <u>for Existing Facilities</u> publication and/or other recommended/established resources. The findings from these additional evaluations will be provided in subsequent ADA Transition Plan updates. The accessibility barriers/issues identified will be ranked in order of priority for improvement.

#### **Improvement Schedule**

Moving forward, the City of Hollywood plans to implement improvements for the following items that have been identified as potential obstacles to accessibility.

Building Facilities and Related Parking Lots/Facilities				
Schedule	Description of Accessibility Improvement Projects / Methods			
Year 1 (2021)	The City contracted with an outside consultant to perform self- assessment training to selected staff and performed additional assessment of the City Hall Annex located at 2600 Hollywood Boulevard to identify additional ADA barriers. The City intends to demolish the City Hall Annex and replace with parking. Therefore, no accessibility improvements to the City Hall Annex are planned.			
Years 2 – 3 (2022-2023)	Based on the results of the ADA self-assessment of the City Hall Annex, the City will perform additional self-assessments of additional buildings and parking lots that provide public access.			
Years 4 – 5 (2024-2025)	Based on the results of the additional ADA self-assessments of the City owned facilities, the City will develop action plans to remove or mitigate any identified barriers to accessibility, if feasible. Perform additional self-assessments of additional buildings and parking lots if required.			

## Pedestrian Facilities / Public Rights-of-Way

As part of the self-evaluation, City of Hollywood is in the process of conducting an inventory and evaluation of pedestrian facilities within its public rights-of-way, which consist of the following:

- 483 miles of sidewalks
- 7,870 curb ramps

A detailed evaluation of these facilities with regard to accessibility compliance will be performed and the results included in subsequent ADA Transition Plan updates.

#### **Previous Practices**

Since the adoption of the ADA, City of Hollywood has striven to provide accessible pedestrian features as part of the City's capital improvement projects. As additional information was made available regarding the methods of providing accessible pedestrian features, the City updated its procedures to accommodate these methods.

In recent years, the City has implemented the following accessibility improvements to its pedestrian facilities:

- Prioritization of curb ramp construction projects based on proximity to the following:
  - Public Buildings
  - Transportation Routes
  - Places of Accommodation
  - o Schools
  - Shopping Centers
  - o Employers
  - Residential Areas
- In addition to the above priority sequencing, curb ramp construction has occurred under the following circumstances:
  - Construction of curb ramps where residents residing on a corner or adjacent to any alley intersection.
  - By special request for any area where there is a demonstrated need.
- The following strategies have been implemented to assist the City in meeting the curb ramp requirements in the ADA:
  - The addition of curb ramp / sidewalk contracts. The City contracts for the installation of curb ramps on an annual basis.
  - Whenever work in the streets requires removal of a curb, curb ramps are installed. Additionally, when major street repairs require streets and/or sidewalks to be torn up, curb ramps are installed.

#### TRANSIT

Broward County Transit (BCT) has jurisdiction over the City's bus system and the location of bus stops. The City works closely with BCT to ensure that public transit stops are accessible. There are approximately 654 transit stops within the City limits, 365 of which are not compliant. 89 bus stops have been made more compliant from 2004 to present and BCT intends to address the remaining non-compliant stops within the next 5 years.

#### **Methodology**

The City of Hollywood will utilize two methods for upgrading pedestrian facilities to current ADA standards. The first and most comprehensive method is through scheduled street and utility improvement projects. All pedestrian facilities impacted by these projects will be

Corridor	Limit 1	Limit 2	Location on Map	
Johnson St.	N. 17 <sup>th</sup> Ave.	N. 14 <sup>th</sup> Ave.	https://goo.gl/maps/bEO UCekW7f5XLoUz7	
Polk St.	N. 9 <sup>th</sup> Ave.	Marina parking lot	https://goo.gl/maps/6pG pWAhGB5MQExBD8	
N. 64th Ave.	Taft St.	Grant St.	https://goo.gl/maps/4eh tD7wx6fLRMvP99	
W. Park Rd.	N. 37 <sup>th</sup> Ave.	N. 37 <sup>th</sup> Ave.	https://goo.gl/maps/dp4 EnPJw8L8HWRM88	
N. Park Rd.	Liberty St.	West Park Rd.	https://goo.gl/maps/koR ydmvdB76k7JfNA	
S. Park Rd.	Pembroke Rd.	Hollywood Blvd.	https://goo.gl/maps/Mz exe9v6qSUxW8M96	
S. 14th Ave.	Wiley St.	Funston St.	https://goo.gl/maps/ccT m95oBPDdNgvXh6	
S. 24 <sup>th</sup> Ter.	Washington St.	Pembroke Rd. (Plunket)	https://goo.gl/maps/n7C efYBYJEAjdoZS6	

upgraded to current ADA accessibility standards. A current listing of these scheduled sidewalk projects for FY 2020-FY2021 are provided below:

The second method is through specific sidewalk and ADA accessibility improvement projects that are identified individually. These projects will be incorporated into the Capital Improvement Program (CIP) on a case-by-case basis as determined by the City of Hollywood staff. The City CIP, which includes a detailed schedule and budget for specific improvements, will be included in subsequent ADA Transition Plan updates.

### **Policy**

The City of Hollywood's goal is to continue to provide accessible pedestrian design features as part of its capital improvement projects. The City has adopted ADA design standards and procedures as listed in Appendix F. These standards and procedures will be kept up to date with nationwide and local best management practices.

The City will consider and respond to all accessibility improvement requests. All accessibility improvements that are deemed reasonable will be scheduled consistent with transportation priorities. The City will coordinate with external agencies to ensure that all new or altered pedestrian facilities within the City jurisdiction are ADA compliant to the maximum extent feasible.

Maintenance of pedestrian facilities within the public rights-of-way will continue to follow the policies set forth by the City.

Requests for accessibility improvements can be submitted to the ADA Title II Coordinator or Transition Plan Implementation Coordinator. Contact information is provided in Appendix A.

### **Priority Areas**

The City of Hollywood has identified specific priority areas for planned accessibility improvement projects. These areas have been selected due to their proximity to specific land uses such as schools, government offices and medical facilities, as well as from the receipt of public comments. The priority areas as identified in the self-evaluation are as follows:

- Area 1: State and local government offices
- Area 2: Transportation
- Area 3: Places of public accommodation
- Area 4: Employers
- Area 5: Other areas (e.g., residential areas where people needing curb ramps reside)

Additional priority will be given to any location where an improvement project or alteration was constructed after January 26, 1991, and accessibility features were omitted.

## **External Agency Coordination**

Many other agencies are responsible for pedestrian facilities within the jurisdiction of the City of Hollywood. The City will coordinate with those agencies to assist with identifying and facilitating elimination of accessibility barriers along their routes.

### **Improvement Schedule**

The City of Hollywood has established the following schedule of goals for improving the accessibility of its pedestrian facilities within the City jurisdiction:

- Within 5 years (2021 to 2025), 100 percent of the pedestrian facility features constructed after January 26, 1991 are to be ADA compliant.
- Within 10 years (2021 to 2031), 80 percent of all pedestrian facility features (including those constructed on or before January 26, 1991) within the priority areas identified by City of Hollywood staff are to be ADA compliant.
- Within 20 years (2021 to 2041), 80 percent of all pedestrian facility features (including those constructed on or before January 26, 1991) within the entire jurisdiction of the City of Hollywood are to be ADA compliant.

Based on results from ongoing self-evaluation of pedestrian facilities, the City of Hollywood will prepare a curb ramp installation schedule to address specific locations where accessibility

improvements are needed. A copy of this schedule will be included in subsequent ADA Transition Plan revisions and included in Appendix A3.

## Parks and Other Recreational Facilities

As part of the self-evaluation process, City of Hollywood has completed and inventory of 725 acres of parks (both active and passive) and other recreational facilities owned by the City. The inventory is below:

Park Name	Acres	Recreation Center/Community Center Square Footage	Park Type/Classification
Arts Park at Young Circle	9.98		H-Active
Boggs Field	14.25		H-Active
Boulevard Heights Community Center & Amphitheater	5.19	10,195	M-Active
David Park Community Center	1.40	6,719	M-Active
David Park Tennis Center	3.00	3,115	M-Active
Dowdy Field	7.36		H-Active
Driftwood Community Center, Pool & Field	12.35	9,361	L-Active
Dr. Martin Luther King, Jr. Community Center	5.00	19,128	M-Active
Eco Grande Golf Course	47.78		M-Active
Garfield St Community Center	0.10	1,735	L-Active
Hollywood Culture & Community Center	1.78	16,716	M-Active
Hollywood Golf Club	104.25		H-Active
Hollywood West Field	6.79		H-Active
Jefferson Park	4.01		H-Active
Kay Gaither Community Center at Beverly Park	1.50	5,355	M-Active
Orangebrook Golf & Country Club	263.97		H-Active
Rotary Park	17.27		H-Active

Park Name		Recreation Center/Community Center Square Footage	Park Type/Classification
Sal Oliveri Veterans Park	0.95		H-Active
Washington Park Community Center & Field	8.52	11,564	M-Active
Anniversary Park	0.28		M-Passive
Beach Theater	0.06		H-Passive
Bicentennial Park	1.47		L-Passive
Bob Butterworth Park	0.59		L-Passive
Carlton Montayane Park	0.76		M-Passive
Cathy & Bob Anderson Park	0.74		M-Passive
Charles Vollman Park	6.01		M-Passive
Charnow Park & Garfield St Paddleball Courts	0.30		H-Passive
Earl Crofford Park	1.64		L-Passive
Emerald Hills Lakes Park	5.00		M-Passive
Eppleman Park	0.29		M-Passive
Fillmore St Playground			H-Passive
Fletcher St TotLot	0.14		L-Passive
Fred Lippman Multi-Purpose Center	0.47	15,562	M-Passive
Harry Berry Park	1.00		M-Passive
Henry L. Graham Park	0.41		M-Passive
Holland Park	24.98		H-Passive
Joe DiMaggio Park	14.93		M-Passive
John B. Kooser Memorial Park	0.15		M-Passive
John Williams Park/Sheridan Oak Forest	23.52		M-Passive
Keating Park	0.40		H-Passive
Kiwanis Park	1.07		L-Passive
Lincoln Park	2.13		M-Passive
Lions Park	0.30		L-Passive
Mara B. Giuilanti Park	2.03		M-Passive

Park Name	Acres	Recreation Center/Community Center Square Footage	Park Type/Classification
McNicol Community Center	0.18		H-Passive
Montella Park	3.10		M-Passive
Oak Lake Community Center & Park	9.73	1,402	M-Passive
Oak Street Park	0.07		L-Passive
Oakridge Park	30.20		M-Passive
Oakwood Hills Park	2.15		L-Passive
Poinciana Park	3.01		M-Passive
Rainbow Tot Lot	0.08		L-Passive
Rose's Garden	0.72		L-Passive
Sailors Point	0.62		M-Passive
Seminole Park	0.86		L-Passive
Stan Goldman Memorial Park	11.30		H-Passive
Three Islands Park	15.45		L-Passive
Water View Park	0.70		L-Passive
Zinkil Park	5.45		H-Passive
Hollywood Marina	2.25	1,756	H-Active

H = High Priority, M = Medium Priority, L = Low Priority

In 2021, the City re-evaluated John Williams Park to determine assessment protocol for future evaluations. An executive summary of the facility report is provided in the Appendix H.

As part of the self-evaluation process, City of Hollywood will prioritize the self-assessment of all active parks and passive parks based on public use, self assessments of "Active" high priority parks will be performed first, followed by the remaining medium active parks. High and medium priority "Passive parks" will be evaluated next. Low priority Active and Passive parks will be completed last.

### **Improvement Schedule**

The City of Hollywood has established the following schedule of goals for improving the accessibility of its parks and recreational facilities within the City jurisdiction:

- Within 5 years (2021 to 2025), 100 percent of the high and medium priority active parks constructed after January 26, 1991 are to be ADA compliant.
- Within 10 years (2021 to 2031), 80 percent of all recreation facilities (including those constructed on or before January 26, 1991) identified by City of Hollywood staff are to be ADA compliant.
- Within 20 years (2021 to 2041), 80 percent of all parks and recreation facilities (including those constructed on or before January 26, 1991) within the entire jurisdiction of the City of Hollywood are to be ADA compliant

A detailed review of these facilities with regard to accessibility compliance will be performed over the next 2-3 years and the results included in subsequent ADA Transition Plan updates. Details of each park can be found in Appendix A4.

## **Public Outreach**

The City of Hollywood recognizes that public participation is an important component in both the Self-Evaluation process and development of this Transition Plan. Input from the community will be gathered and used to help define priority areas for improvements within the jurisdiction of City of Hollywood.

## **Public Notice of ADA Requirements and Grievance Procedure**

Under the Americans with Disabilities Act, each agency is required to publish its responsibilities with regard to ADA compliance. A draft of this public notice is provided in Appendix D.

If users of the City of Hollywood's facilities and services believe the City has not provided a reasonable accommodation, they have the right to file a grievance. In accordance with <u>28 CFR</u> <u>Sec. 35.107(b)</u>, the City has developed a grievance procedure for the purpose of the prompt and equitable resolution of citizens' complaints or concerns. This grievance procedure is outlined in Appendix D.

## **Progress Monitoring and Transition Plan Management**

This Transition Plan is considered to be a living document that will continue to be updated as conditions within the City evolve. The initial schedule is to formally review the complete document (main body and appendices) at least once every two years, to identify any need for

updates. Updates to the appendices or attachments may be made more frequently as needed. Any substantive updates to the main body of this document will include a public comment period to continue the City's public outreach efforts.

The City of Hollywood recognizes that ADA compliance is an ongoing responsibility which will require monitoring to identify future accessibility issues that may be encountered. For example, facilities that currently meet ADA requirements could fall out of compliance in the future due to factors such as damage, disrepair, or changes within public rights-of-way that could create new accessibility obstacles. Therefore, the ADA Title II Coordinator and Transition Plan Implementation Coordinator will establish an on-going monitoring/inspection process to ensure that facilities continue to comply with ADA requirements. Agency employees will also be encouraged to report any accessibility concerns or deficiencies that are identified.

## **Formal Adoption of ADA Transition Plan**

This updated ADA Transition Plan is hereby adopted by the City of Hollywood, effective February 16, of 2022.

Approved by:

Azita Behmardi
ADA Title II Coordinator Date
<u>Mark L. Johnson</u>
ADA Transition Plan Implementation Coord. Date
<u>Wazir Ishmael</u>
City Manager /Authorizing Official Date

## Appendices

### A. Self-Evaluation

- A1. Communications, Information & Facility Signage
- A2. Building Facilities & Related Parking Lots/Facilities
- A3. Pedestrian Facilities / Public Rights-of-Way
- A4. Parks and Other Recreational Facilities
- **B. Schedule and Budget Information**
- C. Public Outreach
- D. Public Notice of ADA Requirements and Grievance Procedure
- **E. Contact Information**
- F. Agency ADA Design Standards and Improvement/Compliance Procedures
- **G.** Glossary of Terms
- H. Facility Report Executive Summaries
- I. Services, Policies, Practices, Programs and Activities Inventory

A public entity that employs 50 or more persons is required, for at least three years following the completion of the self-evaluation, to maintain on file and make available for public inspection:

- A list of the interested persons consulted;
- A description of areas examined and any problems identified; and,
- A description of any modifications made.

### **Interested Persons Consulted**

The City will update this Appendix with a list of interested persons who were consulted during the self-evaluation process along with their comments/suggestions and descriptions of follow-up activities to address accessibility items or concerns that may have been identified.

Descriptions of areas examined, problems identified and any modifications made are listed in the following sections A1, A2 and A3.

## A1. Communications, Information & Facility Signage

The City will conduct a detailed evaluation of its communications, information and facility signage with regard to the ADA Title II requirements and update its ADA Transition Plan accordingly. The results of the evaluations will focus on the following.

#### Inventory & Evaluation Requirements:

- Ensure that communications with applicants, participants, and members of the public with disabilities are as effective as communications with others.
- Auxiliary aids and services provided by the City afford individuals with disabilities an equal opportunity to participate in, and enjoy the benefits of, agency services, programs, or activities.
- Efforts to ensure that interested persons, including persons with impaired vision or hearing, can obtain information as to the existence and location of accessible services, activities, and facilities within the City.
- Signage at all inaccessible entrances to each of the agency's facilities, directing users to an accessible entrance or to a location at which they can obtain information about accessible facilities.
- Ensure that the City's website and all of its contents accessible to individuals with hearing or visual impairments

• Can hearing impaired individuals contact the agency via TTD/TTY phone line or an equally effective telecommunications system such as a relay service?

## A2. Building Facilities & Related Parking Lots/Facilities

The City has conducted a detailed accessibility evaluation of each of its buildings and plans to conduct additional evaluations based on the <u>ADA Checklist for Existing Facilities</u> publication and other established resources. The results will be provided in subsequent updates to the ADA Transition Plan.

#### **Inventory & Assessment Requirements**

The checklist follows four priority areas that were identified in the Department of Justice ADA Title III regulations:

- Priority 1 Accessible approach and entrance
- Priority 2 Access to goods and services
- Priority 3 Access to public toilet rooms
- Priority 4 Access to other items such as water fountains and public telephones

Under Priority 1, an accessible route from site arrival points and an accessible entrance to the facility will be provided. This includes evaluation of parking lots and other parking facilities (such as parking garages) with regard to ADA requirements for provision of accessible parking spaces.

The City will create descriptions, tables and spreadsheets as needed to convey this information. Assessments will Identify specific items or areas where accessibility barriers/issues were identified, and rank these in order of priority for improvement. These details will be included in subsequent ADA Transition Plan updates

#### **Maintenance Activities and Additional Items**

The City continually provides required maintenance and building inspections for items/ elements relating to accessibility (such as elevators, lifts, accessible entrances/doors, etc.).

### A3. Pedestrian Facilities / Public Rights-of-Way

The City is in the process of conducting a detailed accessibility evaluation of pedestrian facilities within the agency's public rights-of-way. The results will be provided in subsequent ADA Transition Plan updates.

For each location and feature, inspected comments regarding the level of accessibility compliance will include the following:

- Percent of sidewalks that met accessibility criteria
- Percent of curb ramps that met accessibility criteria
- Percent of intersections that did not have any curb ramps
- Percent of intersections that have curb ramps that do not meet current ADA criteria
- Percent of crosswalks that met accessibility criteria
- Percent of shared used paths that met accessibility criteria
- Percent of traffic control signals that had push buttons that are accessible, or had the pedestrian indications on recall
- Percent of traffic control signals that had <u>Accessible Pedestrian Signals (APS)</u>

The City will also address accessibility for other parking areas – such as on-street parking – that have not already been addressed within Appendix A2 (Building Facilities and Related Parking Lots/Facilities), to make sure the ADA requirements for the provision of accessible parking spaces has been met.

#### **Maintenance Activities and Additional Items**

The City is in the process of reviewing its sidewalk repair policy and has budgeted funds for sidewalk repair for FY2022.

When the City is responsible for construction, maintenance or utility work areas/zones that impact sidewalks, crosswalks or other pedestrian access routes, ADA requirements are identified during planning and preliminary design to provide advance warning and positive guidance to enhance safety and accessibility for these types of situations.

### A4. Parks and Other Recreational Facilities

The City is in the process of conducting a detailed accessibility evaluation of all parks and recreational facilities with public access. The results will be provided in subsequent ADA Transition Plan updates.

## **Appendix B – Schedule and Budget Information**

#### Overview

Based on the accessibility obstacles/issues identified through the self-evaluation process, and the need to implement improvements in order to comply with ADA accessibility standards, the City of Hollywood will prepare a schedule and budget estimates each Fiscal Year. Below are the proposed allocations over the next 10 years:

	Projected Costs for Accessibility Improvements/Projects					
Accessibility Category	Year 1 2021	Year 2 2022	Yrs. 3 to 5 (2023-2025)	Yrs. 6 to 10 (2026-2031)	Yrs. 11 to 20 (2031-2040)	Estimated Sub- Totals
Communications <sup>1</sup>	\$10,000	\$5,000				\$15,000
Building Facilities <sup>2</sup>	\$200,000	\$250,000	\$250,000			\$700,000
Pedestrian Facilities - After 1/26/1991 <sup>3</sup>	\$245,000	\$100,000	\$100,000			\$445,000
Pedestrian Facilities - Priority Areas <sup>4</sup>	\$245,000	\$846,485	1,045,598	\$600,000	\$600,000	\$3,337,083
Pedestrian Facilities - Entire Jurisdiction <sup>5</sup>	\$100,000	\$100,000	200,000	\$250,000	\$250,000	\$900,000
Park and Recreational Facilities <sup>6</sup>	\$150,000	\$150,000	\$300,000	\$250,000	\$200,000	\$1,050,000
Estimated Total Cost:						\$6,447,083

<sup>1</sup> Aim to complete all accessibility improvements needed for *Communications, Information & Facility Signage* by the end of Year 2.

<sup>2</sup> Aim to complete all accessibility improvements needed for *Building Facilities* by the end of Year 5.

<sup>3</sup> Aim to have 100 percent of *Pedestrian Facility features constructed after January 26, 1991* be ADA compliant by the end of Year 5.

<sup>4</sup> Aim to have 80 percent of *all Pedestrian Facility features (including those constructed on or before January 26, 1991) within the priority areas identified by City* be ADA compliant by the end of Year 10. Continue with additional improvements after Year 10 as feasible.

<sup>5</sup> Aim to have 100 percent of *all existing pedestrian facility features (including those constructed on or before January 26, 1991) within the entire jurisdiction of City of Hollywood* be ADA compliant by the end of Year 20.

<sup>6</sup>Aim to have 100 percent of all active parks and recreational facilities and 80 percent of all passive parks (including those constructed on or before January 26, 1991) within the entire jurisdiction of City of Hollywood be ADA compliant by the end of Year 20.

#### **Discussion & Improvement Project Information**

As indicated in the table on the previous page, the Estimated Total Cost associated with providing ADA accessibility within the categories of Communications, Building Facilities and Pedestrian Facilities is \$6,447,083. This amount represents a significant investment that the City of Hollywood is committed to making in the upcoming years. A systematic approach to providing accessibility will be taken in order to accommodate this cost within the City's budget for accessibility improvements.

## **Appendix C – Public Outreach**

Detailed information such as outreach agendas, meeting minutes, sign-in sheets as well as notification methods regarding future Public Outreach activities will be included in this appendix.

## Appendix D – Public Notice of ADA Requirements and Grievance Procedure

As required by the Americans with Disabilities Act, the City of Hollywood has posted the following notice outlining its responsibilities with regard to ADA compliance.

### **Public Notice**

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990, The City of Hollywood will not discriminate against qualified individuals on the basis of disability in the City's services, programs or activities.

**Employment:** The City of Hollywood does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under Title I of the Americans with Disabilities Act (ADA).

*Effective Communication:* The City of Hollywood will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in the City's programs, services and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing or vision impairments.

*Modifications to Policies and Procedures:* The City of Hollywood will make all reasonable modifications to policies and procedures to ensure that people with disabilities have an equal opportunity to enjoy all City programs, services and activities. For example, individuals with service animals are welcomed in City offices, even where pets are generally prohibited.

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a City program, service or activity, should contact the office of the ADA Coordinator as soon as possible but no later than 48 hours before the scheduled event: Azita Behmardi, City Engineer, 2600 Hollywood Blvd. Room 308, Hollywood, FL 33020. Telephone: 954.921.3251. Email: <a href="mailto:abehmardi@hollywoodfl.org">abehmardi@hollywoodfl.org</a>

The ADA does not require the City of Hollywood to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden.

Complaints that a program, service, or activity of City of Hollywood is not accessible to persons with disabilities should be directed to Azita Behmardi, ADA Title II Coordinator/City Engineer, 2600 Hollywood Blvd. Room 308, Hollywood, FL 33020. Telephone: 954.921.3251. Email: abehmardi@hollywoodfl.org

The City of Hollywood will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy, such as retrieving items from locations that are open to the public but are not accessible to persons who use wheelchairs.

### **City of Hollywood Grievance Procedure**

This Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 ("ADA"). It may be used by anyone who wishes to file a complaint alleging discrimination based on disability in the provision of services, activities, programs, or benefits by the City of Hollywood. The City's Administrative Policies on ADA and Accommodations governs employment-related complaints of disability discrimination.

The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of complainant and location, date, and description of the problem. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint will be made available for persons with disabilities upon request.

The complaint should be submitted by the grievant and/or his/her designee as soon as possible but no later than 60 calendar days after the alleged violation to:

#### Azita Behmardi, P.E.

#### ADA Coordinator/City Engineer

#### 2600 Hollywood Blvd., Room 308

#### Hollywood, FL 33020

#### 954.921.3251

#### ADAcomplaints@hollywoodfl.org

Within 15 calendar days after receipt of the complaint, Azita Behmardi or her designee will meet with the complainant to discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting, Azita Behmardi or her designee will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of the City of Hollywood and offer options for substantive resolution of the complaint.

If the response by Azita Behmardi, or her designee, does not satisfactorily resolve the issue, the complainant and/or her designee may appeal the decision

within 15 calendar days after receipt of the response to the City Manager, or his/her designee.

Within 15 calendar days after receipt of the appeal, the City Manager, or his/her designee, will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, a response will be provided in writing by the City Manager or his/her designee, and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint.

All written complaints received by Azita Behmardi or her designee, appeals to the City Manager or his/her designee, and responses from these two offices will be retained by the City of Hollywood for at least three years.

# Appendix E – Contact Information

### ADA Title II Coordinator

Name: Azita Behmardi, P.E.

Job Title: City Engineer

Office Address: 2600 Hollywood Blvd. Room 308, Hollywood, FL 33020

Phone: 954.921.3251Fax: 954-921-3416E-mail: abehmardi@hollywoodfl.org

#### **ADA Transition Plan Implementation Coordinator**

Name: Mark L. Johnson

Job Title: Project Manager

Office Address: 2600 Hollywood Blvd. Room 308, Hollywood, FL 33020

Phone: 954-921-3991 Fax: 954-921-3416 E-mail: mljohnson@hollywoodfl.org

## Appendix F – Agency ADA Design Standards and Improvement/ Compliance Procedures

## **ADA Resources and Design Standards**

Below are the design standards and reference materials used by the City of Hollywood for specific ADA design and guidance as applicable.

Federal Highway Administration (FHWA) - Civil Rights - ADA/Section 504

Americans with Disabilities Act Accessibility Guidelines (ADAAG)

Public Rights-of-Way (PROWAG) Notice of Proposed Rule Making, July 26, 2011

Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG)

2010 ADA Standards for Accessible Design

ADA Checklist for Existing Facilities

ADA Best Practices Tool Kit for State and Local Governments

Americans with Disabilities Act of 1990, as Amended (2008)

<u>Title 28 CFR Part 35</u> – Nondiscrimination on the Basis of Disability in State and Local Government Services

## **Improvement/Compliance Procedures**

The challenge of dealing with physical or site constraints in alteration projects has been recognized by the authors of ADA accessibility standards for years. The Civil Rights Division of the U.S. Department of Justice has recognized that there could be instances where it might be technically infeasible to construct an alteration in full and strict compliance with ADA accessibility standards, because of physical or site constraints. In such circumstances, the City of Hollywood must provide accessibility to the maximum extent feasible. Before reaching a conclusion about technical infeasibility, the City will consider the extent to which physical or site constraints could be addressed by alternative designs. The burden of proving technical infeasibility rests with the City of Hollywood or the owner that is responsible for the facility, element or feature.

#### **Intersection Corners**

The City of Hollywood will work in good faith to have curb ramps or blended transitions constructed or upgraded to achieve ADA compliance within all capital improvement projects.

There may be limitations which make it technically infeasible for an intersection corner to achieve full accessibility within the scope of a project. If so, those limitations will be noted and those intersection corners will remain in the Transition Plan. As future projects or opportunities arise, those intersection corners shall continue to be incorporated into future work. Regardless of whether full compliance can be achieved in all cases, each intersection corner shall be made as compliant as possible in accordance with the judgment of the City of Hollywood staff.

#### Sidewalks / Trails

The City of Hollywood will work in good faith to have sidewalks and shared use paths constructed or upgraded to achieve ADA compliance within all capital improvement projects. There may be limitations which make it technically infeasible for segments of sidewalks or trails to achieve full accessibility within the scope of a project. If so, those limitations will be noted and those segments will remain in the Transition Plan. As future projects or opportunities arise, those segments shall continue to be incorporated into future work. Regardless of whether full compliance can be achieved in all cases, each sidewalk or trail shall be made as compliant as possible in accordance with the judgment of City of Hollywood staff.

#### **Traffic Control Signals**

The City of Hollywood will work in good faith with Broward County Traffic Engineering to have traffic control signals constructed or upgraded to achieve ADA compliance within all capital improvement projects. There may be limitations which make it technically infeasible for individual traffic control signal locations to achieve full accessibility within the scope of a project. If so, those limitations will be noted and those locations will remain in the Transition Plan. As future projects or opportunities arise, those locations shall continue to be incorporated into future work. Regardless of whether full compliance can be achieved in all cases, each traffic signal control location shall be made as compliant as possible in accordance with the judgment of the City of Hollywood and other agency staff.

#### **Bus Stops**

The City of Hollywood will work in good faith with Broward County Transit to have bus stops constructed or upgraded to achieve ADA compliance within all applicable capital improvement projects. There may be limitations which make it technically infeasible for individual bus stop locations to achieve full accessibility within the scope of a project. If so, those limitations will be noted and those locations will remain in the Transition Plan. As future projects or opportunities arise, those locations shall continue to be incorporated into future work. Regardless of whether full compliance can be achieved in all cases, each bus stop location shall be made as compliant as possible in accordance with the judgment of the City of Hollywood and other responsible agency staff.

#### **Other Transit Facilities**

Additional transit facilities are present within the limits of the City of Hollywood. Those facilities fall under the jurisdiction of various transit providers. The City of Hollywood will work with applicable transit providers to achieve compliance with the applicable accessibility standards.

#### Other services, policies, practices, programs and activities

The City of Hollywood has completed an inventory of all City services, policies, practices, programs and activities required to be compliant under the ADA (see Appendix I). The City will evaluate the current services, polices, and practices for compliance with the ADA and verify that each service, program, and activity are being operated so that it is readily accessible and useable by individuals with disabilities. Modifications to City services, policies, practices, programs and activities will be made if determined to be non-compliant.

## **Appendix G – Glossary of Terms**

**ABA:** See Architectural Barriers Act.

ADA: See Americans with Disabilities Act.

**ADA Transition Plan:** Transportation system plan that identifies accessibility needs, the process to fully integrate accessibility improvements, and aims to ensure that all transportation facilities, services, programs, and activities are accessible to all individuals.

ADAAG: See Americans with Disabilities Act Accessibility Guidelines.

**Accessible:** A facility that provides access to people with disabilities using the design requirements of the ADA.

**Accessible Pedestrian Signal (APS):** A device that communicates information about the WALK phase in audible and vibrotactile formats.

**Alteration**: A change to a facility in the public right-of-way that affects or could affect access, circulation, or use. An alteration must not decrease or have the effect of decreasing the accessibility of a facility or an accessible connection to an adjacent building or site.

**Americans with Disabilities Act (ADA):** Civil rights legislation passed in 1990 and effective July 1992. The ADA sets design guidelines for accessibility to public facilities, including sidewalks and trails, by individuals with disabilities.

Americans with Disabilities Act Accessibility Guidelines (ADAAG): Contains scoping and technical requirements for accessibility to buildings and public facilities by individuals with disabilities under the Americans with Disabilities Act (ADA) of 1990.

**APS:** See Accessible Pedestrian Signal.

**Architectural Barriers Act (ABA):** Federal law that requires facilities designed, built, altered or leased with Federal funds to be accessible. The Architectural Barriers Act marks one of the first efforts to ensure access to the built environment.

**Capital Improvement Program (CIP)**: The CIP for a public agency typically includes an annual capital budget and a five-year plan for funding the new construction and reconstruction projects on the agency's transportation system.

**Detectable Warning:** A surface feature of truncated domes, built in or applied to the walking surface to indicate an upcoming change from pedestrian to vehicular way.

**DOJ:** See United States Department of Justice.

**Federal Highway Administration (FHWA):** A branch of the U.S. Department of Transportation that administers the federal-aid Highway Program, providing financial assistance to states to construct and improve highways, urban and rural roads, and bridges.

FHWA: See Federal Highway Administration.

**Pedestrian Access Route (PAR):** A continuous and unobstructed walkway within a pedestrian circulation path that provides accessibility.

**Pedestrian Circulation Route (PCR):** A prepared exterior or interior way of passage provided for pedestrian travel.

**PROWAG:** An acronym for the *Guidelines for Accessible Public Rights-of-Way* issued in 2005 by the U.S. Access Board. This guidance addresses roadway design practices, slope and terrain related to pedestrian access to walkways and streets, including crosswalks, curb ramps, street furnishings, pedestrian signals, parking and other components of public rights-of-way.

**Right-of-Way**: A general term denoting land, property, or interest therein, usually in a strip, acquired for the network of streets, sidewalks and trails creating public pedestrian access within a public entity's jurisdictional limits.

**Section 504:** The section of the Rehabilitation Act that prohibits discrimination by any program or activity conducted by the federal government.

**Uniform Federal Accessibility Standards (UFAS):** Accessibility standards that all federal agencies are required to meet; includes scoping and technical specifications.

**United States Access Board:** An independent federal agency that develops and maintains design criteria for buildings and other improvements, transit vehicles, telecommunications equipment, and electronic and information technology. It also enforces accessibility standards that cover federally-funded facilities.

**United States Department of Justice:** Federal executive department responsible for enforcement of the law and administration of justice (also referred to as the Justice Department or DOJ).

## **Appendix H – Facility Report Executive Summaries**

## Appendix I – Services, Policies, Practices, Programs and Activities Inventory