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City of Yuma

Americans with Disabilities Act (ADA) Self-Evaluation and Transition Plan

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Table of Contents

Abbreviations	iv
1.0 Introduction	1
1.1 Purpose	1
1.2 Legislative Mandate.....	1
1.3 ADA Self-Evaluation and Transition Plan Development Requirements and Process	1
1.4 Discrimination and Accessibility	2
1.4.1 Physical Barriers	2
1.4.2 Programmatic Barriers	2
1.4.3 Ongoing Accessibility Improvements	2
1.4.4 City of Yuma Approach	2
1.5 Exceptions and Exemptions	3
1.6 New Construction and Alterations	3
1.7 Maintenance Versus Alterations	4
1.8 FHWA Guidance on Closing Pedestrian Crossings.....	6
1.9 Existing City Programs that Implement ADA Upgrades	6
2.0 Public Outreach	7
3.0 Self-Evaluation and Summary of Observations	9
3.1 Programs, Services, and Activities Review.....	9
3.1.1 ADA/504 Coordinator	10
3.1.2 Roles and Responsibilities of the ADA/504 Coordinator	10
3.1.3 ADA Grievance Policy, Procedure, and Form with Appeal Process for the ADA	11
3.1.4 Public Notice Under the ADA	11
3.2 Program, Services, and Activities Inventory	12
3.3 Self-Evaluation Action Plan	12
3.4 Existing Facility Inventory	12
3.4.1 Buildings.....	13
3.4.2 Recreation Facilities	14
3.4.3 Parks.....	14
3.4.3 Signalized Intersections	16
3.4.4 Sidewalk Corridors	16
3.4.5 Facility Inventory Summary.....	16
3.5 City of Yuma Self-Evaluation Action Plan	17
3.6 Schedule and Implementation Methods	18
3.7 Prioritization	18
3.7.1 Prioritization Factors for Facilities	19
3.8 Action Log	23
4.0 Funding Opportunities	25
4.1 Federal and State Funding	25
4.2 Local Funding	25
4.3 Private Funding	25
5.0 Conclusion and Next Steps	27

Appendix 29

- Appendix A: Grievance Procedure
 - City of Yuma Title II Grievance Procedure
 - City of Yuma Title II Grievance Form
- Appendix B: Public Notice Under the ADA
- Appendix C: Federal Highway Administration ADA Transition Plans Memo
- Appendix D: Facility Inventory Map
- Appendix E: Sample Action Log
- Appendix F: Federal and State Funding Opportunities

List of Tables

Table 1. Summary of Buildings to be Reviewed 13

Table 2. Summary of Recreational Facilities to be Reviewed 14

Table 3. Summary of Parks to be Reviewed 14

Table 4. Prioritization Factors for Buildings/Parks 20

Table 5. Prioritization Factors for Signalized and Unsignalized Intersections 21

Table 6. Prioritization Factors for Sidewalk Corridors 22

List of Figures

Figure 1. Maintenance versus Alteration Projects 5

Abbreviations

ADA – Americans with Disabilities Act

CFR – Code of Federal Regulations

CIP – Capital Improvement Projects

DOJ – United States Department of Justice

FHWA – Federal Highway Administration

MUTCD – Manual on Uniform Traffic Control Devices

PROWAG – Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way

PSA – Programs, Services, and Activities

1.0 Introduction

1.1 Purpose

The purpose of this Americans with Disabilities Act (ADA) Self-Evaluation and Transition Plan is to summarize the activities completed to-date related to ADA compliance and to create a roadmap for the City of Yuma to update their ADA Transition Plan. Prioritization methodology for evaluating and implementing improvements was developed based on the applicable ADA Standards for Accessible Design (ADA Standards) and Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG), and the details are provided in this document.

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

1.2 Legislative Mandate

The 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.

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

The City of Yuma is obligated to observe all requirements of Title I in its employment practices; Title II in its policies, programs, and services; any parts of Titles IV and V that apply to the City and its programs, services, or facilities; and all requirements specified in the applicable ADA Standards and 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:

- Providing notice to the public about the ADA;
- Designation of at least one (1) person who is responsible for overseeing Title II compliance;
- Adopting and publishing of an ADA complaint procedure;
- Self-Evaluation of current services, policies, and practices and modification if non-compliant;
- Operating each service, program, or activity so that it is readily accessible and useable by individuals with disabilities; and
- Development of a Transition Plan to schedule the removal of structural barriers. The Transition Plan will become a working document until all barriers have been addressed.

This document describes the process developed to complete the evaluation of the City of Yuma's services, policies, practices, programs, activities, and facilities, provides possible solutions to remove programmatic barriers, and presents a Transition Plan for the modification of facilities and public rights-of way to improve accessibility, which will guide the planning and implementation of necessary program and facility modifications over the next several years. The ADA Self-Evaluation and Transition Plan is significant in that it establishes the City's ongoing commitment to the development and maintenance of PSAs and facilities that accommodate all those who live in and visit the City.

1.4 Discrimination and Accessibility

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

Accessibility applies to all aspects of a program or service, including but not limited to physical access, advertisement, orientation, eligibility, participation, testing or evaluation, provision of auxiliary aids, transportation, policies, and communication.

The following are examples of elements that should be evaluated for barriers to accessibility:

1.4.1 Physical Barriers

- Parking
- Path of travel to, throughout, and between buildings and amenities
- Doors
- Service counters
- Restrooms
- Drinking fountains
- Public telephones
- Access to pedestrian equipment at signalized intersections

1.4.2 Programmatic Barriers

- Building signage
- Customer communication and interaction
- Non-compliant sidewalks, pedestrian street crossing, pedestrian driveway crossings, or curb ramps
- Emergency notifications, alarms, and visible signals
- Participation opportunities for City sponsored events

1.4.3 Ongoing Accessibility Improvements

After the initial evaluations, City PSAs and facilities will continue to be evaluated on an ongoing basis, and the ADA Transition Plan will be revised to account for changes that have been or will be completed since the initial facility evaluations. This Plan will be posted on the City's website for review and consideration by the public.

1.4.4 City of Yuma Approach

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

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

1.5 Exceptions and Exemptions

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

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

In determining whether an alteration would threaten or destroy the historic significance of a historic property, the City should first confirm if the property is on the National Register of Historic Places. Based on a search of the National Register of Historic Places NPGallery Database (<https://npgallery.nps.gov/nrhp>) and the associated geodatabase (<https://irma.nps.gov/DataStore/Reference/Profile/2210280>), there are 50+ registered historical places within the City of Yuma, but there may be other documentation available not provided on these websites. A map of these properties is provided on the City website:

<https://www.yumaaz.gov/home/showpublisheddocument/4182/637695699332130000>.

The City has established the Design and Historic Review Commission (DHRC). The DHRC holds a variety of responsibilities with the goal of promoting historical preservation in the City. The Commission and its members review plans for development in the City's Aesthetic Overlay (the gateways to the City) and within the City's three historic districts. Commission members use state and federal guidelines for development in addition to local City-approved neighborhood specific historic district and design guidelines.

The Design and Historic Review Commission should take the ADA into consideration when providing recommendations to ensure the current standards are being met when facilities are altered.

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

1.6 New Construction and Alterations

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

The most recent standard is the 2010 ADA Standards, which sets the minimum requirements – both scoping and technical – for newly designed and constructed or altered state and local government facilities, public accommodations, and commercial facilities to be readily accessible to and usable by individuals with disabilities. It is

effectuated from 28 Code of Federal Regulations (CFR) 35.151 and the 2004 Americans with Disabilities Act Accessibility Guidelines (ADAAG). However, the FHWA and DOJ recommend using PROWAG for designing facilities within the public rights-of-way as a best practice until it is adopted at the federal level. The Manual on Uniform Traffic Control Devices (MUTCD) is also incorporated by reference within PROWAG. The Arizona Department of Transportation (ADOT) allows for compliance with PROWAG, when feasible, if a feature does not meet the 2006 ADA Standards for Transportation Facilities. It is recommended that the City of Yuma adopt PROWAG so that it becomes an enforceable document for all City projects within the public rights-of-way, regardless of its adoption status at the state and federal level.

2010 ADA Standards

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

PROWAG

The U.S. Access Board recently published new guidelines under the ADA and the Architectural Barriers Act (ABA) that address access to sidewalks and streets, crosswalks, curb ramps, pedestrian signals, on-street parking, and other components of public rights-of-way. These guidelines also review shared use paths, which are designed primarily for use by bicyclists and pedestrians for transportation and recreation purposes. PROWAG provides minimum guidelines for the accessibility of pedestrian facilities in the public rights-of-way. When these guidelines are adopted, with or without modifications, as accessibility standards in regulations issued by other federal agencies implementing the ADA, Section 504 of the Rehabilitation Act, and the ABA, compliance with those enforceable accessibility standards is mandatory. The final rule was published on August 8, 2023, and becomes effective on September 7, 2023. In a memorandum dated January 23, 2006 from the Federal Highway Administration, the PROWAG is the recommended best practice and can be considered the state of the practice that could be followed for areas not fully addressed by the 2010 ADA Standards.

MUTCD

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

1.7 Maintenance Versus Alterations

The United States DOJ has issued a briefing memorandum on clarification of maintenance versus alteration projects. Information contained in the briefing memorandum is below. This clarification regarding when curb ramp installation is required as part of a project can be used as a reference for City of Yuma staff who regularly are involved in maintenance and alteration projects.

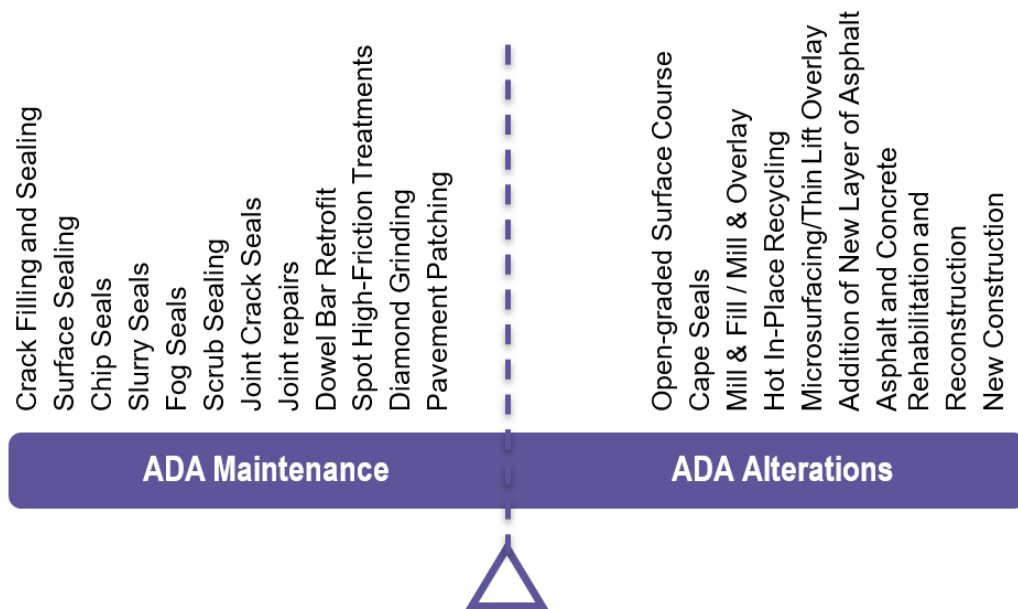
The Americans with Disabilities Act of 1990 (ADA) is a civil rights statute prohibiting discrimination against persons with disabilities in all aspects of life, including transportation, based on regulations promulgated by the United States DOJ. DOJ's regulations require accessible planning, design,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

1.8 FHWA Guidance on Closing Pedestrian Crossings

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

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

Agencies wishing to close certain intersection crossings should have a reasonable and consistent policy on when to do so written in their Transition Plan or as a standalone document. If safety concerns are established by an engineering study, a pedestrian crossing should not be accommodated for any user. The City of Yuma will only consider closing an existing pedestrian crossing if it is determined to be unsafe by an engineering study.

1.9 Existing City Programs that Implement ADA Upgrades

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

- **Inclusive Play Project:** In 2022, the City began working on improvements to the Stewart Vincent Wolfe Creative Playground (282 N. 12th Avenue) with the addition of a new inclusive play area. The inclusive playground exceeds the minimum standards of accessibility to ensure every child can fully engage with the equipment without limitations. More information can be found on the City website: <https://www.yumaaz.gov/government/parks-recreation/inclusive-play-project>.
- **Multi-use Paths:** As part of the 2018 Yuma Bikeways Plan, 53 miles of bike paths are proposed to be added to the existing City network in addition to proposed bike lanes along existing or new roadways. Bike paths (also referred to as multi-use paths) are off-street paved paths that are physically separated from motorized traffic by an open space or barrier. Bike paths attract recreational users such as joggers, walkers, and other non-motorized users. Typically, bike paths are constructed of concrete or asphalt and are built to a standard width of 10 feet.

2.0 Public Outreach

In July 2023, the City established an ADA Advisory Commission for the purpose of advising the City Administrator and City staff in matters pertaining to the needs and interests of, and the barriers negatively impacting, the disability community. This City code text amendment ensures the City is Safe and Prosperous, Respected and Responsible, Connected and Engaged, and Active and Appealing by making the Yuma community accessible to those who experience disabilities, providing an avenue to communicate with the City regarding needs of disabled persons, and ensuring essential services are available to the public.

The Commission will be comprised of seven members to be appointed by the Mayor and City Council. The City of Yuma's ADA Coordinator shall serve as secretary to the Commission. The City will work with the Commission members to determine the frequency in which the Commission will meet and will also meet the fourth Tuesday of the first month of every quart of the year. The City plans to solicit feedback on the Self-Evaluation and Transition Plan directly from the Commission and work with the Commission to determine the best approach for receiving feedback from the disability community.

The City will also be hosting open houses and will have open public comment periods as part of the Master Transportation Plan (MTP) update. The MTP includes policies and investment strategies for traditional roadway improvement; but as a multimodal plan, it also outlines enhancements to public transportation, bicycle facilities, pedestrian environments, and other mobility and accessibility functions. The City will work with the ADA Advisory Commission to solicit feedback from the disability community.

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3.0 Self-Evaluation and Summary of Observations

The City of Yuma's Americans with Disabilities Act (ADA) Transition Plan will include the results of a comprehensive review of the programs, services, and activities provided to employees and the public. The Plan will also include the observations from facility evaluations of all City-owned/maintained buildings and associated parking lots, parks and associated parking lots, park sidewalk and associated curb ramps, signalized intersections, and public rights-of-way sidewalks and associated curb ramps.

3.1 Programs, Services, and Activities Review

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

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

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

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

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

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

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

3.1.1 ADA/504 Coordinator

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

The City of Yuma has appointed Robert Duffy as ADA/504 Coordinator for Title I and Title II. Below is the ADA Coordinator's contact information. However, this information is not published on the City website or in other City documents:

Robert Duffy, ADA/504 Coordinator
Environmental and Safety Program Manager
Human Resources
City Hall, One City Place
Yuma, AZ 85364
Office: 928-373-5125
Relay: 7-1-1
robert.duffy@yumaAz.gov

The ADA/504 Coordinator contact information must be provided to interested parties. The following distribution methods should be considered:

- Post on the City website;
- Prominently display in common areas that are accessible to all employees and areas open to the public;
- Provide in materials that are distributed by the City for meetings and events where requests for auxiliary aids or services for effective communication might be needed; and
- Provide in materials that are distributed by the City where ADA questions or concerns may arise.

3.1.2 Roles and Responsibilities of the ADA/504 Coordinator

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

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

The responsibilities of the ADA/504 Coordinator include coordinating the City's efforts to comply with Title II and investigating any complaints related to potential violations of Title II. The role of the ADA Coordinator typically includes being the primary contact when members of the public request an auxiliary aid or service for effective communication, such as a sign language interpreter or documents in Braille. An effective ADA Coordinator will be

able to efficiently assist people with disabilities with their questions. These roles and responsibilities are consistent with the Department of Justice’s guidance for “An Effective ADA Coordinator” (<https://www.ada.gov/pcatoolkit/chap2toolkit.htm>).

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

Local governments with 50 or more employees are required to adopt and publish procedures for resolving grievances in a prompt and fair manner that may arise under Title II of the ADA. The purpose of the ADA grievance procedure is to provide a mechanism for the resolution of discrimination issues at the City level, rather than require the complainant to resort to resolution at the federal level. ADA grievance policies and procedures were developed in January 2023. The DOJ recommends that all written complaints received by the City, appeals to the City, and responses from the City be retained by the City for at least three (3) years.

Grievance Policy: Completed Actions

The City of Yuma Grievance Policy, Procedure, and Form with Appeal Process for the ADA was developed in January 2023, and a copy of the City’s Grievance Procedure and Form are included in **Appendix A**. The City uses CivicPlus’ SeeClickFix to receive ADA grievances via text, email, and phone. SeeClickFix is a comprehensive and robust 311, request management, and resident engagement solution that is integrable with the most widely used Esri and asset management systems. SeeClickFix will be used to maintain an ADA grievance log as well.

3.1.4 Public Notice Under the ADA

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

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

The notice should also include the name and contact information of the ADA/504 Coordinator. Publishing and publicizing the ADA notice is not a one-time requirement. State and local government entities should provide the information on an ongoing basis, whenever necessary. DOJ suggestions for ways to provide notice are provided at: <https://www.ada.gov/pcatoolkit/chap2toolkit.htm>.

Public Notice Under the ADA: Completed Actions

The City of Yuma Public Notice Under the ADA was developed in January 2023, and a copy of the City’s Public Notice Under the ADA is included in **Appendix B**. Publicizing the ADA notice is not a one-time requirement, and the City will provide the information on an ongoing basis, whenever necessary.

3.2 Program, Services, and Activities Inventory

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

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

3.3 Self-Evaluation Action Plan

The Federal Highway Administration (FHWA) has provided guidance on the ADA Transition Plan process in their "INFORMATION: ADA Transition Plans" memo dated June 27, 2019 (see **Appendix C**). A copy of the memo is also available on the FHWA website: https://www.fhwa.dot.gov/civilrights/memos/ada_transition_plans_062719.cfm. While this memo specifically addresses state departments of transportations, FHWA also recommends this guidance for local municipalities until municipality-specific guidance is developed by FHWA. Provided in the memo is a checklist for elements to be included in an ADA Transition Plan and other ADA requirements that agencies must fulfill.

Items included in the FHWA checklist related to the public rights-of-way are:

- **Inventory of Barriers** (identification of physical obstacles)
 - Identify intersection information, including curb ramps and other associated accessibility elements.
 - Require an Action Plan to develop an inventory of sidewalks (slopes, obstructions, protruding objects, changes in level, etc.), signals (including accessible pedestrian signals), bus stops (bus pads), buildings, parking, rest areas (tourist areas, picnic areas, visitor centers, etc.), mixed use trails, linkages to transit.
 - Discuss jurisdictional issues/responsibilities for sidewalks.
- **Schedule**
 - Show a strong commitment toward upgrading ADA elements identified in the inventory of barriers in the short-term (planned capital improvement projects).
 - Show a strong commitment over time toward prioritizing curb ramps at walkways serving entities covered by the ADA.
 - Schedule should include prioritization information, planning, and investments directed at eliminating other identified barriers over time.
 - Dedicate resources to eliminate identified ADA deficiencies.
- **Implementation Methods**
 - Describe the methods that will be used to make the facilities accessible and include the governing standard (e.g., ADA Standards, PROWAG).

The City of Yuma has compiled a list of all City-owned and/or maintained facilities to be evaluated for compliance with applicable ADA Standards and PROWAG.

3.4 Existing Facility Inventory

The first step in completing a Self-Evaluation for physical facilities is understanding what facilities the City is responsible for maintaining and where each of these facilities is located. The existing facility inventory will include

City-owned or maintained buildings, parks, signalized intersections, sidewalk corridors, unsignalized intersections and driveways along sidewalk corridors, and railroad crossings along sidewalk corridors. Inventories for buildings, parks, signalized intersections, sidewalk corridors, have been developed and are summarized in the following sections

3.4.1 Buildings

The City of Yuma owns and maintains 22 buildings with public access. **Table 1** is a list of all City of Yuma-owned buildings.

Table 1. Summary of Buildings to be Reviewed

Location Name	Property Address	Sq. Ft.
1. Fire Station #1	353 S 3rd Avenue	14,064
2. City Hall	One City Plaza	61,497
3. Martin Luther King Jr Youth Career Center	300 S 13th Avenue	13,801
4. Facilities Maintenance	180 West 14th Street	12,149
5. City of Yuma Engineering & Public Works Department	155 W 14th Street	34,831
6. New Fleet Services	265 W 13th Street	3,592
7. City of Yuma Prosecutors	190 W 14th Street	14,404
8. City of Yuma Warehouse Surplus Auction	190 W 14th Street	5,582
9. Yuma Municipal Court	1515 S 2nd Avenue	17,533
10. Household Hazardous Waste	1473 S 2nd Avenue	1,177
11. Yuma Police Department	1500 S 1st Avenue	46,692
12. Fire Station #4	2850 W 16th Street	7,047
13. Harvest Preschool Childcare & Joe Henry Optimist	1793 S 1st Avenue	7,072
14. Fire Station #3	508 E 25th Street	10,358
15. Fire Station #2	3284 S Avenue A	11,692
16. Riverside Outdoor Education Center	Riverside Park, 50 Prison Hill Road	1,209
17. Classroom Fire Station #5 / AWC	6490 E 26th Street	2,377
18. Fire Station #5	6490 E 26th Street	12,033
19. Yuma Police Araby East Substation	6390 E 26th Street	4,000
20. Thomas F. Allt Utilities Complex	270 W 13th Street	20,175

All buildings with public access (see **Table 1**) will be evaluated for compliance with the applicable ADA Standards including parking lots, path of travel from the parking lot to the building, access into the building, signage, drinking fountains, telephones, bathrooms, and counter heights. All on-site sidewalk and all associated curb ramps, ramps, stairs, and other paths of travel required to be ADA compliant will also be evaluated.

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

A map of the buildings within the City of Yuma is included in **Appendix D**.

3.4.2 Recreation Facilities

The City of Yuma owns and maintains 9 recreational facilities. **Table 2** is a list of all City of Yuma-owned recreational facilities.

Table 2. Summary of Recreational Facilities to be Reviewed

Location Name	Property Address	Sq. Ft.
1. Carver Pool	1250 W 5th Street	2,312
2. Clymer Recreation Center	553 S. Orange Avenue	3,900
3. Historic Yuma Theater	254 S. Main Street	10,000
4. Kennedy Pool	890 E 24th Street	3,780
5. Marcus Pool	5th Street & 5th Avenue	3,702
6. North End Community Center	160 E. 1st Street	7,702
7. Yuma Arts Center	254 S. Main Street	18,000
8. Yuma Civic Center	1440 W Desert Hills Drive	49,735
9. Yuma Readiness & Community Center	6550 E 24th Street	24,882

All recreational facilities (see **Table 2**) will be evaluated for compliance with the applicable ADA Standards including parking lots, path of travel from the parking lot to the building, access into the building, signage, drinking fountains, telephones, bathrooms, and counter heights. All on-site sidewalk and all associated curb ramps, ramps, stairs, and other paths of travel required to be ADA compliant will also be evaluated.

A map of the recreational facilities within the City of Yuma is included in **Appendix D**.

3.4.3 Parks

The City of Yuma owns and maintains 49 parks. **Table 3** is a list of all City of Yuma-owned parks.

Table 3. Summary of Parks to be Reviewed

Location Name	Property Address
1. Armed Forces Park	281 Gila Street
2. Bark Park	1705 E. Palo Verde Street
3. Barkley Ranch Park	2750 S 48th Drive
4. Caballero Park	West 34th Street
5. Carver Park	S 13th Ave & W 5th Street
6. Centennial Athletic Complex	2650 W. 20th Street
7. Cibola Athletic Complex	4100 20th Street
8. Clymer Park	533 S. Orange Avenue
9. Desert Hills Golf Course <i>(includes pro shop, restaurant, and snack shack with public restrooms)</i>	1245 W. Desert Hills Drive
10. Desert Hills Golf Course – Par 3 <i>(includes double-wide trailer)</i>	1301 W. 32nd Street
11. Desert Ridge Park	26th Place & Avenue 7 3/4 E
12. Elena Orendain Curtis Athletic Complex	2100 W. 28th Street

Location Name	Property Address
13. Friendship Park	Avenue A & 34th Place
14. Gateway Park	1st Street & Gila
15. Hacienda Park 1	24th Lane & 18th Avenue
16. Hacienda Park 2	27th Drive & 18th Avenue
17. Hacienda Park 3	28th Lane & 18th Avenue
18. Hacienda Park 4	26th Street & 17th Avenue
19. Heritage Library Park <i>(excludes Heritage Library, which is County owned and maintained)</i>	3rd Street & 3rd Avenue
20. Jennifer Wilson Park (North Caballero Park)	14th Avenue & Colorado Street
21. Joe Henry Athletic Complex	2310 W. Colorado Street
22. Joe Henry Memorial Park	23rd Avenue and Colorado Street
23. Joe Henry Optimist Center Park	1793 S. 1st Avenue
24. John Morris Cottage	385 S. 13th Avenue
25. Keegan Athletic Complex	23rd Street & Kennedy Lane
26. Kennedy Athletic Complex	2251 S. Kennedy Lane
27. Kennedy Memorial Park	23rd Street & Kennedy Lane
28. Kiwanis Park	8th Street & Magnolia Avenue
29. Las Casitas Park	31st Place & 28th Drive
30. Marcus Park	5th Street & 5th Avenue
31. Netwest Park	12th Street & 14th Avenue
32. Ocotillo Park	42nd Place & Jojoba Avenue
33. Pacific Avenue Athletic Complex	1700 E 8th St, Yuma, AZ
34. Parkway Place Park	27th Street & 39th Drive
35. Ponderosa Park	26th Street & 29th Drive
36. Ray Kroc Sports Complex	1280 W. Desert Sun Drive
37. Riverside Park	Prison Hill Road & Giss Parkway
38. Roxaboxen Park	2nd Avenue & 8th Street
39. Saguaro Neighborhood Park	4183 Desert Willow Way
40. Sanguinetti Memorial Park	8th Avenue & 23rd Street
41. Smucker Memorial Park	Avenue A & 28th Street
42. Sunrise Optimist Park	20th Street & 45th Avenue
43. Terraces Park	2601 E. View Parkway
44. Valley Aquatic Center	4381 W. 18th Street
45. Victoria Meadows Park	23rd Street & 20th Drive
46. West Wetlands Park/Centennial Beach	282 N. 12th Avenue
47. Winsor Rotary Park	20th Street & Avenue B 1/2
48. Yuma Valley Park	3162 W. 24th Street

All existing parks will be evaluated for compliance with the applicable ADA Standards, including parking lots, path of travel from the parking lot to the park amenities, access into facilities, signage, drinking fountains and restrooms.

A map of the parks within the City of Yuma is included in **Appendix D**.

3.4.3 Signalized Intersections

All City-owned or maintained signalized intersections will be evaluated for compliance with PROWAG. Signalized intersection evaluations will document the conditions and measurements along the pedestrian path of travel, which includes street crossings, curb ramps, sidewalk adjacent to the curb ramps, and pedestrian signal equipment and adjacent clear spaces. Based on the inventory, the City maintains 89 signalized.

A map of the signalized intersections within the City of Yuma is included in **Appendix D**.

3.4.4 Sidewalk Corridors

Using aerial imagery, the City developed a GIS-based inventory of City-maintained sidewalk corridors and cross street locations along these corridors. Based on the inventory, the City of Yuma maintains approximately 652 miles of sidewalk corridors, including pedestrian street and driveway crossings. Additionally, there is one (1) location where City-maintained sidewalk intersects an existing at-grade railroad crossing with pedestrian access.

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

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

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

3.4.5 Facility Inventory Summary

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

- 22 buildings;
- 9 recreational facilities;
- 49 parks;
- 89 signalized intersections; and
- 652 miles of sidewalk corridors, including pedestrian street crossings, pedestrian driveway crossings, and associated curb ramps.

3.5 City of Yuma Self-Evaluation Action Plan

This City's Facility Evaluation Action Plan assigns an evaluation priority level to all inventoried facilities, which allows the City to prepare a schedule to complete the evaluations.

Phased Facility Evaluation Approach

The Department of Justice (DOJ) does not have any requirements or guidelines on how to prioritize which facilities should be evaluated first if you plan to phase your data collection over time, only that all facilities must be evaluated in order for an agency's ADA Transition Plan to be complete.

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

- **Number of existing complaints** – Locations with complaints have already been identified by the public as problem areas and should be evaluated as soon as possible to determine if the if the complaints are valid.
- **Proximity to pedestrian attractors** – Locations near pedestrian attractor (e.g., hospitals, retirement facilities, medical offices, parking garages, major employers, disability service providers, event facilities, bus or transit stop/routes, schools, government and public facilities, parks, libraries, churches) are more likely to have a higher risk compared to those locations without pedestrian attractors.
- **Proximity to residential areas** – Locations near residential areas are more likely to have a higher risk than those locations adjacent to industrial areas where pedestrians are less likely to travel.
- **Number of crashes** – Locations with pedestrian-related crashes should be evaluated to determine if there is a design reason for the crashes.
- **Age of facility** – Facilities constructed after July 26, 1991 are a higher risk than those constructed before the 1991 ADA Standards were published since they were constructed out of compliance.
- **Street classification** – Arterials typically have higher pedestrian activity than local roadways and may be a higher risk.
- **Pedestrian/vehicle volumes** – Higher pedestrian/vehicle volume roadways are more likely to have higher risk than lower volume pedestrian/vehicle roadways. Pedestrian volumes may be quantified using indicators such as number of pedestrian activations as a signalized intersection.
- **Existing sidewalks** – The ADA does not require sidewalks to be installed, but existing sidewalks must be compliant and the accessible route maintained in an accessible condition. Locations with existing sidewalks are a higher risk than locations without existing sidewalks.
- **Public Input** – Receiving and taking into consideration feedback from the public to better understand their concerns is recommended. While formal complaints may not have been filed, areas of concern to the public are more likely to have a higher risk for litigation if no improvements are made and an issue exists.

There are also other factors to take into consideration, such as:

- **Spatial distribution of facilities** – Selecting facilities to be evaluated evenly across different areas of the City might be more well-received by the public, assuming all the risk factors above are equal.
- **Facility type** – Selecting a variety of different facilities to be evaluated during each phase, instead of all of the same facility type, may provide a better understanding of your high-risk areas. If the selected sidewalks are evaluated and are determined to be mostly compliant, but the selected curb ramps are evaluated and determined to be mostly non-compliant, the City may want to consider doing a higher percentage of curb ramp evaluations during next phase of evaluations.
- **Upcoming Capital Improvement Projects (CIP)** – If curb ramps will be completely removed and replaced as part of an upcoming project, the ADA compliance of the new construction should be confirmed during construction inspections and resources would be better spent evaluating curb ramps that are not planned for reconstruction.

The decisions on how to prioritize which facilities to evaluate first is entirely up to the City and may or may not include the factors above.

3.6 Schedule and Implementation Methods

It is acceptable for the City to phase the Self-Evaluation over several fiscal years; however, the DOJ and FHWA will not consider the initiative to be complete until all evaluations have been completed. The City should determine and document in the Transition Plan the anticipated number of years required to complete the Self-Evaluation of City programs, services, activities, and associated facilities identified in **Section 3.2 Program, Services, and Activities Inventory** and **Section 3.4 Existing Facility Inventory**.

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

3.7 Prioritization

To aid in the development of the implementation plan, prioritization information has been provided for each facility type where compliance issues exist. **Table 4** provides the prioritization criteria for buildings and parks. **Table 5** provides the prioritization criteria for signalized and unsignalized intersections. **Table 6** provides the prioritization schedule for sidewalk corridors. All compliance elements included in the prioritization schedule are based on requirements from the ADA Standards and PROWAG. While every effort will be made to design and implement improvements to be consistent with these standards, the City will provide access to the maximum extent feasible where full compliance is technically infeasible. Priorities were assigned based on DOJ priorities for facility access, previous project experience, and case law with respect to the severity of non-compliance. FHWA and DOJ have not provided any guidance on how to prioritize issues, only that prioritization information should be included as part of the schedule; however, best practices suggest that the prioritization methodology and resulting thresholds be first based on the severity of non-compliance (e.g., slightly out of compliance versus out of compliance enough to create a potentially dangerous condition) and then second based on the barrier's proximity to pedestrian attractors (e.g.,

adjacent to a hospital or governmental facility with high daily pedestrian traffic). Any complaints received by the City will also be reviewed, and associated prioritization updates will be incorporated into the Transition Plan.

Sidewalk corridors include the entire pedestrian path of travel, including sidewalk, pedestrian street crossings, and pedestrian driveway crossings. However, for project design and costing purposes, the recommended improvements for pedestrian street crossings are more appropriately reported with the rest of the intersection improvements.

It should also be noted that sidewalks are not required by the ADA, but if they are installed, sidewalks must be compliant. Accordingly, missing sidewalk segments could be given a low priority. However, providing a complete sidewalk network is a priority of the City so missing sidewalk segments are assigned a high priority

To determine the priority for each facility, the raw measurements should be compared to the criteria in **Tables 4, 5, and 6**. To do this, start at Priority 1 and determine if any of the criteria apply. If yes, assign the facility a priority of 1. If no, move to Priority 2 and determine if any of the criteria apply. This process should be repeated until a priority has been assigned to all intersections and each sidewalk corridor segment.

3.7.1 Prioritization Factors for Facilities

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

Signalized and unsignalized intersections are recommended to be prioritized on a 13-point scale, which is defined in **Table 5**. This prioritization methodology was developed by the Consultant Team to aid the City in determining which signalized and unsignalized intersections should be prioritized for improvements over other signalized and unsignalized intersections based on the severity of non-compliance with ADA and proximity to pedestrian attractors.

Sidewalk corridors are recommended to be prioritized on a 3-point scale and with a priority of either “High”, “Medium”, “Low” based on the severity of non-compliance, which is defined in **Table 6**. Compliant segments of the sidewalk corridor are recommended to be given a priority label of “Compliant”.

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Table 4. Prioritization Factors for Buildings/Parks

Priority	Criteria
1 (high)	Complaint known or imminent danger present
2 (high)	<ul style="list-style-type: none"> • Element is more than twice the allowable requirement. No known complaint. • AND (for exterior conditions) location is near a hospital, school, transit stop, government building, or other pedestrian attractor.
3 (high)	<ul style="list-style-type: none"> • Element is more than twice the allowable requirement. No known complaint. • AND (for exterior conditions) location is not near a hospital, school, transit stop, government building, or other pedestrian attractor.
4 (high)	Issues with parking or exterior conditions (DOJ level 1) – moderately out of compliance
5 (medium)	Issues with access to goods and services (DOJ level 2) – severely out of compliance
6 (medium)	Issues with: <ul style="list-style-type: none"> • Access to goods and services (DOJ level 2) – moderately out of compliance; • Parking or exterior conditions (DOJ level 1) – minimally out of compliance; OR • Restrooms (DOJ level 3) – severely out of compliance
7 (medium)	Issues with: <ul style="list-style-type: none"> • Access to goods and services (DOJ level 2) – minimally out of compliance; • Restrooms (DOJ level 3) – moderately out of compliance; OR • Drinking fountains or public phones (DOJ level 4 & 5) – severely out of compliance
8 (medium)	Issues with drinking fountains or public phones (DOJ level 4 & 5) - moderately out of compliance
9 (low)	Issues with restrooms (DOJ level 3) – minimally out of compliance
10 (low)	Issues with drinking fountains or public phones (DOJ level 4 & 5) - minimally out of compliance
11 (low)	<ul style="list-style-type: none"> • Client is a Title II agency; AND • Elements out of compliance, but may be able to be handled programmatically or do not need to be handled unless or until the agency hires a person with a disability
12 (low)	Element is fully compliant with an older standard (safe-harbored), but will need to be brought into compliance with current standards if altered

Table 5. 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 curb 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 curb 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)	Existing diagonal curb ramp (serving both crossing directions on the corner) is non-compliant and should be replaced with two curb ramps, one serving each crossing direction on the corner.
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 turning space
10 (low)	Existing diagonal curb ramp without a 48-inch extension into the crosswalk
11 (low)	Existing pedestrian push button is not accessible from the sidewalk and/or curb 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 6. Prioritization Factors for Sidewalk Corridors

Criteria	Priority 1 (high)	Priority 2 (medium)	Priority 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	Elevation change greater than 1/2 inch or gaps greater than 1 inch	Elevation change between 1/4 inch and 1/2 inch or gaps between 1/2 inch and 1 inch	
Railroad crossing excessive sidewalk vertical discontinuity	Elevation change greater than 1/4 inch or gaps greater than 1 inch)		
Railroad crossing prefabricated plate is plastic or does not exist	Yes – Plastic or No		
Railroad crossing flangeway gap > 3 inches (freight) or flangeway gap > 2.5 inches (non-fright)	Value > 3.0" (freight) or 2.5" (non-freight)		
Railroad crossing is missing detectable warning surface(s)	No – Neither Side or Yes – 1 Side Only		

3.8 Action Log

As the evaluations are completed, the City will institute an ADA Action Log to confirm follow-up on corrective actions required under the Transition Plan and documenting City efforts at compliance with the ADA. At a minimum, the Action Log will identify items that are not ADA compliant and will include anticipated completion dates. The ADA Action Log will be updated on an annual basis and should be available to the public upon request. See example of ADA Action Log provided in **Appendix E**.

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4.0 Funding Opportunities

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

4.1 Federal and State Funding

There is federal and state funding available for the City to apply for through numerous agencies for various improvements. A summary of the available funding opportunities is provided in **Appendix F**. A copy of this information is also available on the FHWA website:

https://www.fhwa.dot.gov/environment/bicycle_pedestrian/funding/funding_opportunities.cfm.

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

4.2 Local Funding

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

- Community Development Block Grants (CDBG)
- General fund (sales tax and bond issue)
- Scheduled/funded CIP projects that are funded through bonds
- Special tax districts – A district with the power to provide some governmental or quasi-governmental service and to raise revenue by taxation, special assessment, or charges for services.
- ROAD Tax – local one-half percent transaction privilege tax approved by voters in 1994 for maintenance and construction of roadways

4.3 Private Funding

Private funding may include local and national foundations, endowments, private development, and private individuals. While obtaining private funding to provide improvements along entire corridors might be difficult, it is important for the City to require private developers to improve pedestrian facilities to current ADA requirements, whether it by new development or redevelopment of an existing property.

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5.0 Conclusion and Next Steps

This document serves as the Americans with Disabilities Act (ADA) Self-Evaluation and Transition Plan for the City of Yuma. The City intends to complete the Self-Evaluation of City facilities identified in this document over the next five (5) years, with an approximated \$315,000 - \$390,000 annual budget.

The next steps for the City of Yuma are:

1. Complete evaluation of all City facilities. The City anticipates completing the evaluations in the phases listed below. Phases 2 – 4 will be conducted using a detailed data collection methodology and Phases 5 and 6 will be conducted using qualitative data collection methodology.

Phase 1 was completed in 2023 and include the development of a facility inventory to determine the quantity of facilities to be evaluated in future phases.

Phase 2 (18 months)

- 10 buildings and associated parking lots/paths of travel (50% of the buildings)
- 4 recreational facilities and associated parking lots/paths of travel (~50% of the recreational facilities)
- 24 parks and associated parking lots/paths of travel, park sidewalk and associated curb ramps (50% of the parks)
- 44 signalized intersections and associated curb ramps (~50% of the signalized intersections)
- 32 miles public rights-of-way arterial sidewalks and associated curb ramps and railroad crossings (50% of the arterial sidewalks)

Phase 3 (18 months)

- 10 buildings and associated parking lots/paths of travel (50% of the buildings)
- 5 recreational facilities and associated parking lots/paths of travel (~50% of the recreational facilities)
- 24 parks and associated parking lots/paths of travel, park sidewalk and associated curb ramps (50% of the parks)
- 45 signalized intersections and associated curb ramps (~50% of the signalized intersections)
- 32 miles public rights-of-way arterial sidewalks and associated curb ramps and railroad crossings (50% of the arterial sidewalks)

Phase 4 (18 months)

- 46 miles public rights-of-way collector sidewalks and associated curb ramps and railroad crossings (100% of the collector sidewalks)

Phase 5 (18 months)

- 272 miles public rights-of-way local sidewalks and associated curb ramps and railroad crossings (50% of the local sidewalks)

Phase 6 (18 months)

- 272 miles public rights-of-way local sidewalks and associated curb ramps and railroad crossings (50% of the local sidewalks)

Facility evaluations should include the following:

- a. Facility reports with the compliance status of each element evaluated based on the applicable ADA Standards and access-related state and local standards that were applicable at the time of construction for buildings, recreational facilities, and parks and PROWAG and applicable access-related state and local standards for pedestrian facilities in the public rights-of-way;
 - b. Possible solutions to remove any barriers and bring the element into compliance;
 - c. Planning-level cost estimates of possible solutions,
 - d. Prioritization of the individual facility, independent of other locations of the same facility type; and
 - e. Field work data in GIS format with associated metadata, compatible with the City's GIS system.
2. Develop an Implementation Plan, including schedule for completing the recommended facility improvements and funding sources to be used.
 3. Update the City's ADA Transition Plan after each evaluation phase.
 4. Continue to update the City's ADA Transition Plan as projects are implemented and requests/complaints are received.
 5. Determine the best approach for receiving public input on the ADA Self-Evaluation and Transition Plan and include outreach efforts in Phase 2.
 6. Document the Self-Evaluation findings from the City's review of current services, policies, practices, programs, and activities, including modifications that have been made or will be made to bring these into compliance, if needed.

Appendix

Appendix A: Grievance Procedure

City of Yuma Title II Grievance Procedure

City of Yuma Title II Grievance Form

Appendix B: Public Notice Under the ADA

Appendix C: Federal Highway Administration ADA Transition Plans Memo

Appendix D: Facility Inventory Map

Appendix E: Sample Action Log

Appendix F: Federal and State Funding Opportunities