



# City of Universal City

## Americans with Disabilities Act Self-Evaluation and Transition Plan

June 2025

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The City of Universal City has prepared this transition plan with the assistance of the consultant team led by Kimley-Horn and Associates, Inc. The Consultant Team, the ADA Coordinator, and the contributing departments of the City of Universal City are responsible for developing the ADA Self-Evaluation and Transition Plan report and program.



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## ABBREVIATIONS

**ADA** – Americans with Disabilities Act

**ADAAG** – Americans with Disabilities Act Accessibility Guidelines

**CFR** – Code of Federal Regulations

**CIP** – Capital Improvement Projects

**DOJ** – United States Department of Justice

**FHWA** – Federal Highway Administration

**MUTCD** – Manual on Uniform Traffic Control Devices

**PROWAG** – 2023 Public Rights-of-Way Accessibility Guidelines Final Rule

**PSA** – Programs, Services, and Activities

**TAC** – Texas Administrative Code

**TDLR** – Texas Department of Licensing and Regulation

**TMUTCD** – Texas Manual on Uniform Traffic Control Devices

## 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, identify any physical or programmatic barriers for programs, services, activities (PSAs) and facilities offered to the public, and create a roadmap for the City of Universal City to implement and update their ADA Transition Plan over time. Prioritization methodology for evaluating and implementing improvements was developed based on the applicable 2010 ADA Standards, 2023 Public Rights-of-Way Accessibility Guidelines Final Rule (PROWAG), and the details are provided in this document.

This document includes an overview of the ADA and provides recommendations for Universal City 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 comprehensive civil rights law prohibiting discrimination on the basis of a disability. The purpose of the law is to make sure that people with disabilities have the same right and opportunities as everyone else. The ADA protects the rights of individuals with disabilities in employment, access to state and local government services, places of public accommodation, transportation, and other important areas of life. The ADA also requires 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. The ADA consists of five titles:

- ▶ Title I: Employment
- ▶ Title II: State and Local Government
- ▶ Title III: Public Accommodations
- ▶ Title IV: Telecommunications
- ▶ Title V: Miscellaneous Provisions

Universal City is obligated to observe all requirements of Title I in its employment practices; Title II in its programs, services, and activities; and any parts of Titles IV and V that apply to the City and its programs, services, and activities; and all requirements specified in the applicable ADA Standards and PROWAG that apply to facilities and other physical holdings.



### 1.3 ADA SELF-EVALUATION AND TRANSITION PLAN DEVELOPMENT REQUIREMENTS AND PROCESS

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

- ▶ Completion of a Self-Evaluation;

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

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



## **1.4 DISCRIMINATION AND ACCESSIBILITY**

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

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

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

### **1.4.1 PHYSICAL BARRIERS**

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

### **1.4.2 PROGRAMMATIC BARRIERS**

- ▶ Building signage
- ▶ Customer communication and interaction
- ▶ Non-compliant sidewalks or curb ramps



- ▶ Emergency notifications, alarms, and visible signals
- ▶ Participation opportunities for City sponsored events

### 1.4.3 ONGOING ACCESSIBILITY IMPROVEMENTS

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

### 1.4.4 UNIVERSAL CITY APPROACH

The purpose of the Transition Plan is to provide the framework for achieving equal access to Universal City's programs, services, and activities, including facilities, 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 Universal City residents seek to enjoy, and guides future improvements.

Universal City 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. Universal City 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 no registered historical places within Universal City, but there may be other documentation available not provided on these websites.

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 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. Additionally, the Texas Department of Transportation (TxDOT) has adopted PROWAG and incorporated the guidelines into design standards for pedestrian facilities. The Manual on Uniform Traffic Control Devices (MUTCD) is also incorporated by reference within PROWAG. It is recommended that Universal City 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.

### **Public Rights-of-Way Accessibility Guidelines (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. The Accessibility Guidelines for Pedestrian Facilities in the Public Rights-of-Way provide 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 became effective on September 7, 2023. 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.

In the state of Texas, the Texas Administrative Code (TAC) Chapter 68 (Elimination of Architectural Barriers), Rule §68.102 (Public Right-of-Ways Projects) references compliance with the latest version of PROWAG for elimination of barriers for public rights-of-way projects. The Texas Department of Licensing and Regulation (TDLR) adopted Rule §68.102, effective May 15, 2017. The applicable section of the rule states:

- (a) *For public right-of-way projects, in addition to accepting compliance with applicable TAS requirements, the department will also accept compliance with the Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way, published by the Architectural and Transportation Compliance Board (Access Board) on July 26, 2011, 36 CFR Part 1190 or its final adopted guidelines.*

### **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.

It should be noted that the Texas Manual on Uniform Traffic Control Devices (TMUTCD) is incorporated by reference in the TAC and shall be recognized as the Texas standard for all traffic control devices installed on any public street, highway, bikeway, or private road open to public travel.

### **2013 Outdoor Developed Areas Guidelines**

The Access Board is responsible for developing accessibility guidelines for the construction and alteration of facilities covered by the ADA and the Architectural Barriers Act (ABA) of 1968, which include outdoor developed areas. The Outdoor Developed Areas guidelines ensure that the facilities are readily accessible to and usable by people with disabilities. The Access Board issued the current guidelines in 2004. The 2004 guidelines contain provisions for several types of recreation facilities, including boating facilities, fishing piers and platforms, golf facilities, play areas, sports facilities, and swimming pools. The Access Board amended the 2004 guidelines in 2013 by adding new provisions for trails, picnic and camping facilities, viewing areas, and beach access routes constructed or altered by federal agencies or by non-federal entities on federal land on behalf of a federal agency pursuant to a concession contract, partnership agreement, or similar arrangement.

The new provisions for trails, picnic and camping facilities, viewing areas, and beach access routes are not included in the DOJ's 2010 ADA Standards and have no legal effect on state

and local governments and private entities subject to DOJ's ADA regulations. State and local governments and private entities may, however, use the provisions for guidance when designing trails, picnic and camping facilities, viewing areas, and beach access routes. State and local governments and private entities are cautioned to check with DOJ about using the technical requirements for outdoor recreation access routes, instead of accessible routes, to connect elements at picnic and camping facilities, viewing areas, and trailheads.



## 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 Universal City 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**

 <b>ADA Maintenance</b>	 <b>ADA Alterations</b>
<ul style="list-style-type: none"> <li>Crack Filling and Sealing</li> <li>Surface Sealing</li> <li>Chip Seals</li> <li>Slurry Seals</li> <li>Fog Seals</li> <li>Scrub Sealing</li> <li>Joint Crack Seals</li> <li>Joint repairs</li> <li>Dowel Bar Retrofit</li> <li>Spot High-Friction Treatments</li> <li>Diamond Grinding</li> <li>Pavement Patching</li> </ul>	<ul style="list-style-type: none"> <li>Open-graded Surface Course</li> <li>Cape Seals</li> <li>Mill &amp; Fill/Mill &amp; Overlay</li> <li>Hot In-Place Recycling</li> <li>Microsurfacing/Thin Lift Overlay</li> <li>Addition of New Layer of Asphalt</li> <li>Asphalt and Concrete</li> <li>Rehabilitation and Reconstruction</li> <li>New Construction</li> </ul>

Source: DOJ Briefing Memorandum on Maintenance versus Alteration Projects



## 1.8 FHWA GUIDANCE ON CLOSING PEDESTRIAN CROSSINGS

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

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

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



## 1.9 EXISTING CITY PROGRAMS THAT IMPLEMENT ADA UPGRADES

ADA Compliance and pedestrian connectivity are major considerations during the planning and design stage of every Universal City project. Currently, there are two major thoroughfare projects that are in design, both with the goal of improving ADA compliance and pedestrian safety along major roadways in the City.

### **Thoroughfare & Roundabout Improvements at Kitty Hawk Rd**

The goal of the project is to improve the existing public access to the Walmart on Kitty Hawk Rd. and includes a roundabout, drainage improvements, a new signalized intersection crossing with pavements markings and signage.

- ▶ Installing approximately 1,500 feet of sidewalk
- ▶ Installing approximately 400 feet of 10' wide shared-use path
- ▶ Installing 15 curb ramps to meet ADA standards
- ▶ Installing 6 pedestrian push buttons at signalized intersections

### **Reunion Thoroughfare**

The goal of the project is to install new roadway infrastructure to connect Kitty Hawk Rd. to Universal City Blvd. with new roadway connections to Loop 1604 and Byrd Blvd.

- ▶ Installing approximately 1,800 feet of sidewalk
- ▶ Installing approximately 9000 feet of 10' wide shared-use path
- ▶ Installing 20 ADA compliant curb ramps
- ▶ Installing a crosswalk at 3 legs of a roundabout intersection that include ADA compliance pedestrian refuges
- ▶ Provides much needed pedestrian connectivity from Loop 1604 to the Cities sidewalk network



## 2.0 PUBLIC OUTREACH

The City plans to conduct public outreach efforts including a public access survey and an associated interactive online map in later phases of the Transition Plan.

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## 3.0 SELF-EVALUATION AND SUMMARY OF OBSERVATIONS

The City of Universal City's ADA Transition Plan will be updated to include the results of a comprehensive review of the programs, services, and activities, including facilities, provided to employees and the public. The plan will be updated to 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, public rights-of-way sidewalks and associated curb ramps, rail crossings, and stand-alone parking lots as the evaluations are completed.



### 3.1 PROGRAMS, SERVICES, AND ACTIVITIES REVIEW

Under the ADA, Universal City is required to complete a Self-Evaluation of the City's facilities, programs, services, and activities. The Self-Evaluation identifies and provides possible solutions to 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.

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

However, the City does not have to take any action that will result in a fundamental alteration in the nature of a program or activity, create a hazardous condition for other people, or result in an undue financial and/or administrative burden. This determination 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 (TITLE II)**

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

Universal City has appointed Justin Garcia as ADA/504 Coordinator for Title II. Below is the ADA Coordinator's contact information.

Justin Garcia, ADA/504 Coordinator  
Fire Marshal / Asst. Chief  
Fire Department  
2150 Universal City Blvd  
Universal City, TX 78148  
Office: 210-659-0333 ext. 788  
Relay: 7-1-1  
jgarcia@uctx.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 AMERICANS WITH DISABILITIES ACT**

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. Neither Title II nor its implementing regulations describe what ADA grievance procedures must include; however, the U.S. Department of Justice suggests the following content:

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

Universal City's ADA grievance policies and procedures were developed in August 2024. Copies of the City's Title II Grievance Procedure and Form are provided in [Appendix A](#). It is recommended that the City's Title II ADA Grievance Policy, Procedure, and Form be posted on the City's website.

### **3.1.4 PUBLIC NOTICE UNDER THE ADA**

The ADA public notice requirement applies to all state and local governments covered by Title II, including entities with fewer than 50 employees. The target audience for the public notice includes applicants, beneficiaries, and other people interested in the entity's PSAs. This notice is required to include information regarding Title II of the ADA and how it applies to the PSAs of the public entity. State and local government entities should provide the information on an ongoing basis, whenever necessary. The Department of Justice suggests including brief statements about:

- ▶ Employment;



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

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>.

Universal City's Public Notice under the ADA was developed in August 2024. A copy is provided in [Appendix A](#). Publicizing the ADA notice is not a one-time requirement; the City will provide the information on an ongoing basis, whenever necessary. It is recommended that the City's Public Notice be posted on the City's website.

### 3.1.5 ADA LIAISON COMMITTEE

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

Universal City has established an ADA Liaison Committee that is generally comprised of a representative from each City department. These representatives are tasked with serving as the ADA contact for their department and will consult with the ADA/504 Coordinator regarding all ADA issues impacting their department. Each representative is responsible for keeping a detailed log for all ADA inquiries within their department. This log shall be shared with ADA/504 Coordinator and shall be retained for at least three (3) years.

To promote awareness of the committee and their activities, the ADA Liaison Committee information can be publicized in common areas that are accessible to employees and areas open to the public. This includes posting this information on the City website.



### 3.2 PROGRAM, SERVICES, AND ACTIVITIES INVENTORY

Universal City plans to compile a list of all City 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 ADA Transition Plan will be made to include findings and possible solutions for identified barriers as the inventory and Self-Evaluation of these PSAs are completed.



### 3.3 FACILITY 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 B](#)). 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., 2010 ADA Standards, PROWAG).

Universal City plans to evaluate all City-owned and/or maintained facilities for compliance with 2010 ADA Standards for Accessible Design 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 facility is located. Universal City completed a facility inventory in 2024. The results are documented in the following sections.

#### 3.4.1 BUILDINGS

**Table 1** is a list of all Universal City-owned buildings.

**TABLE 1. SUMMARY OF BUILDINGS TO BE REVIEWED**

Location Name	Property Address
1. Animal Care and Control	134 Athenian Dr
2. City Hall & Police Dept.	2150 Universal City Blvd
3. Fire Dept.	2160 Universal City Blvd
4. Library	100 Northview Dr
5. Olympia Hills Golf Course	12900 Mt Olympus
6. Public Works Service Center	265 Kitty Hawk Rd

All City-owned buildings 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. Approximately three-tenths (0.3) of a mile of 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 City-owned buildings is included in [Appendix C](#).

### 3.4.2 PARKS

Universal City owns and maintains 10 parks. **Table 2** is a list of all Universal City-owned parks.

**TABLE 2. SUMMARY OF PARKS TO BE REVIEWED**

Location Name	Property Address
1. Neville Park & Clubhouse	368 Wagon Crossing
2. Copano Ridge Park	307 Cottage View
3. Meadow Oaks Park	55 Meadowland
4. Northview Park and Splash Pad	100 Randolph Plaza Dr.
5. Red Horse Park	1100 North Blvd.
6. Remington Place Park	118 Granite Mist
7. Athenian Park / Aina Blake Dog Park	134 Athenian Drive
8. Universal City Park	305 North Blvd.
9. Veterans Park	737 E. Aviation

All existing parks and trails will be evaluated for compliance with the 2010 ADA Standards for Accessible Design, including parking lots, path of travel from the parking lot to the park amenities, access into facilities, signage, drinking fountains and restrooms. Approximately three (3) miles of on-site sidewalk and all associated curb ramps, ramps, stairs, pedestrian bridges, and other paths of travel required to be ADA compliance will also be evaluated. A map of City-owned parks is included in [Appendix C](#).

### 3.4.3 STAND-ALONE PARKING LOTS

Universal City maintains one (1) stand-alone parking lot, and the number of accessible parking spaces is summarized in the following table. All City-maintained accessible parking will be evaluated for compliance with PROWAG based on the conditions and measurements of the existing accessible parking space. A map of the stand-alone parking lots is included in [Appendix C](#).

**TABLE 3. STAND-ALONE PARKING SUMMARY**

Stand-Alone Parking Lot Location	Accessible Spaces
119 E. Aviation Blvd	2

### 3.4.4 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 four (4) signalized intersections which are shown on a map in [Appendix C](#).

### 3.4.5 SIDEWALK CORRIDORS

Using aerial imagery and existing inventory information, an updated Geographic Information System (GIS)-based inventory of City-maintained sidewalk corridors and cross street locations was developed in August 2024. Based on the inventory, Universal City maintains approximately 84 miles of sidewalk corridors, including pedestrian street and driveway crossings. At the time of inventory development, there were 326 unsignalized cross street intersections and 159 driveways and alleys along the City-maintained sidewalk corridors.

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

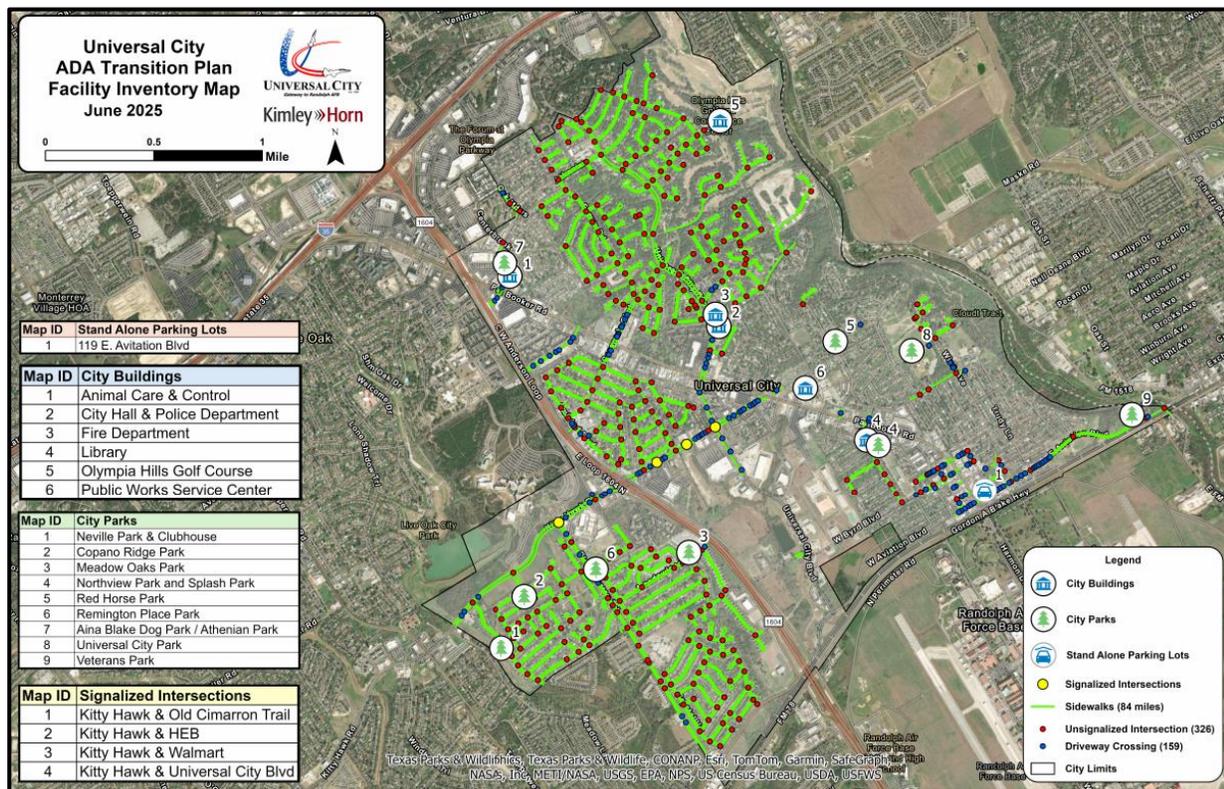
The ADA of 1990, Section 35.150, Existing Facilities, requires that the Transition Plan include a schedule for providing curb ramps or other sloped area at existing pedestrian walkways, which applies to all facilities constructed prior to 1992. For any sidewalk installations constructed from 1992 to March 15, 2012, the curb ramps should have been installed as part of the sidewalk construction project per the 1991 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 areas at any intersection having curbs or other barriers at intersections to streets, roads, or highways.”

A map of the sidewalk corridors to be evaluated is included in [Appendix C](#).

### 3.4.6 FACILITY INVENTORY SUMMARY

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

- ▶ Six (6) buildings
- ▶ 10 parks
- ▶ 84 miles of sidewalk
- ▶ Four (4) signalized intersections;
- ▶ 326 unsignalized intersections and 159 driveways along the sidewalk corridors
- ▶ One (1) stand-alone parking lot





### 3.5 UNIVERSAL CITY SELF-EVALUATION ACTION PLAN

The second step in completing a Self-Evaluation is developing an Action Plan to evaluate all existing buildings, parks, signalized intersections, sidewalk corridors, unsignalized intersections along the sidewalk corridor path of travel (including cross streets and driveways) based on the applicable ADA Standards and PROWAG. This Action Plan should include the identification of evaluation criteria, the development of evaluation methodology and reporting output, and a schedule to complete the evaluations. Best practices for each of these items are detailed in the following sections. Once an Action Plan has been developed, the existing facility evaluations should be started.

#### ***Evaluation Criteria***

For each facility type, the following elements should be evaluated for consistency with applicable ADA Standards and PROWAG.

#### ***Evaluation Methodology***

Several technologies are currently available to aid in the data collection process. At a minimum, it is recommended that the equipment used to collect the data be capable of the following:

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

#### ***Reporting Capabilities***

When selecting a technology to aid with data collection, the City should take into consideration whether a reporting system has been developed to process the raw data. For the data to be readily usable by the City for developing their Citywide ADA Transition Plan, the reporting system should provide the following output:

- ▶ Compliance status of each element evaluated based on the 2010 ADA Standards, and PROWAG;
- ▶ Recommended improvements to remove any barriers and bring the element into compliance;
- ▶ Estimated cost of recommended improvement; and
- ▶ Prioritization of the individual facility, independent of other locations of the same facility type.

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

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

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

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

### ***Phased Self-Evaluation Approach***

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

- ▶ **Number of existing complaints** – Locations with complaints identified by the public as problem areas should be evaluated as soon as possible to determine if the complaints are valid.
- ▶ **Proximity to pedestrian attractors** – Locations near pedestrian attractors (e.g., hospitals, retirement facilities, medical offices, parking garages, major employers, disability service providers, event facilities, bus or transit stop/routes, schools, government and public facilities, parks, libraries, and churches) are more likely to have a higher risk compared to those locations without pedestrian attractors.
- ▶ **Proximity to residential areas** – Locations 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.
- ▶ **Roadway functional classification** – Arterials typically have higher pedestrian activity than local roadways and may be a higher risk.
- ▶ **Pedestrian/vehicle volumes** – Higher pedestrian/vehicle volume roadways are more likely to have higher risk than lower volume pedestrian/vehicle roadways. Pedestrian

volumes may be quantified using indicators such as number of pedestrian actuations at signalized intersections.

- ▶ **Existing sidewalks** – The ADA does not require sidewalks to be installed, but existing sidewalks must be compliant and the accessible route must be maintained in an accessible condition. Locations with existing sidewalks are a higher risk than locations without existing sidewalks.
- ▶ **Public input** – Receiving and taking into consideration feedback from the public to better understand their concerns is recommended. While formal complaints may not have been filed, areas of concern to the public are more likely to have a higher risk for litigation if an issue exists and the City does not respond and/or doesn't make any improvements.

**Other factors to consider include:**

- ▶ **Spatial distribution of facilities** – Selecting facilities to be evaluated evenly across different areas of the City or Council districts might be more well-received by the public, assuming all the risk factors above are equal.
- ▶ **Facility type** – Selecting a variety of different facilities to be evaluated during each phase, instead of selecting only a single facility type, may provide a better understanding of your high-risk areas. If the sidewalks evaluated are determined to be mostly compliant and the curb ramps evaluated are determined to be mostly non-compliant, the City may want to consider including a higher percentage of curb ramps during the next phase of evaluations.

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

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



### 3.6 SCHEDULE AND IMPLEMENTATION METHODS

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, and activities to be identified in [Section 3.2 Program, Services, and Activities Inventory](#) and the facilities identified in [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. Depending on the estimated cost of improvements, a typical implementation plan for an entity the size of Universal City can range from 10 to 15 years. 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 should be provided for each facility with identified compliance issues. **Table 4**, **Table 5**, and **Table 6** provide proposed prioritization criteria for buildings/parks, intersections (both signalized and unsignalized), and 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 the ADA Standards and PROWAG, the City will provide access to the maximum extent feasible where full compliance is technically infeasible. The priorities were assigned based on DOJ priorities for facility access, previous project experience, and case law with respect to the severity of non-compliance. FHWA and DOJ have not provided any guidance on how to prioritize issues, only that prioritization information should be included as part of the schedule; however, best practices suggest that the prioritization methodology and resulting thresholds be first based on the severity of non-compliance (i.e., dangerous condition) and then second based on the barrier's proximity to pedestrian attractors (e.g., adjacent to a hospital or governmental facility with high daily pedestrian traffic). Since raw data is recommended to be collected during the Self-Evaluation, all data needed for prioritization should already be contained in the database except for known complaints and proximity to pedestrian attractors. To streamline the prioritization of each facility, the proximity to pedestrian attractors should be collected when the elements contained within the applicable ADA Standards and PROWAG are evaluated.

Sidewalk corridors include the entire pedestrian path of travel, including sidewalk, cross streets, and driveways. When prioritizing a sidewalk corridor, priorities for the entire pedestrian path of travel should be reported together. However, for project design and costing purposes, the recommended improvements for cross streets 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. Therefore, missing sidewalk segments are given a low priority.



To determine the priority for each facility, the raw data should be compared to the criteria in **Table 4**, **Table 5**, and **Table 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 prioritized on a 3-point scale which is defined in **Table 4**. This prioritization methodology was developed by the Consultant Team to aid the City in determining how the barriers at parks and buildings should be prioritized for improvements based on the severity of non-compliance with ADA and DOJ prioritization factors.

Unsignalized intersections are 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 unsignalized intersections should be prioritized for improvements over other unsignalized intersections based on the severity of non-compliance with ADA.

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

**TABLE 4. PRIORITIZATION FACTORS FOR BUILDINGS AND PARKS**

Priority	Criteria
<b>1 (high)</b>	<ul style="list-style-type: none"> <li>▶ Lack of barrier-free parking</li> <li>▶ Lack of accessible route to the building's door</li> <li>▶ Stairs where ramps or level surface are needed</li> <li>▶ Doors that are too narrow</li> <li>▶ Lack of elevator in a multi-level building</li> <li>▶ Severely non-compliant slopes for accessible routes or ramps</li> <li>▶ Displacements in walks or high thresholds</li> <li>▶ Missing handrails</li> <li>▶ Some signage issues (particularly those related to life/safety)</li> </ul>
<b>2 (medium)</b>	<ul style="list-style-type: none"> <li>▶ Minor non-compliant slopes</li> <li>▶ Some signage issues</li> <li>▶ Minor issues with doors (small dimensional non-compliance, opening force and closing speed)</li> <li>▶ Non-compliant dimensional issues (vestibules, corridors, etc.)</li> <li>▶ Stairwell/stair issues, particularly where an elevator is not available</li> <li>▶ Accessible restrooms</li> <li>▶ Accessible work and service counters</li> <li>▶ Moderately non-compliant dimensional issues</li> <li>▶ Some protruding objects</li> </ul>
<b>3 (low)</b>	<ul style="list-style-type: none"> <li>▶ Many signage issues</li> <li>▶ Minor issues with light switches, electrical outlets, etc.</li> <li>▶ Minor non-compliant dimensional issue</li> </ul>

**TABLE 5. PRIORITIZATION FACTORS FOR SIGNALIZED AND UNSIGNALIZED INTERSECTIONS**

Priority	Criteria
<b>1 (high)</b>	Complaint filed on curb ramp or intersection or known accident/injury at site
<b>2 (high)</b>	Existing curb ramp with any of the following conditions: <ul style="list-style-type: none"> <li>▶ Running slope &gt; 12%</li> <li>▶ Cross slope &gt; 7%</li> <li>▶ Obstruction to or in the curb ramp or landing</li> <li>▶ Level change &gt; ¼ inch at the bottom of the curb ramp</li> <li>▶ No detectable warnings</li> </ul> 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
<b>3 (high)</b>	▶ 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
<b>4 (high)</b>	No curb ramps, but striped crosswalk exists
<b>5 (medium)</b>	Existing curb ramp with any of the following conditions: <ul style="list-style-type: none"> <li>▶ Running slope &gt; 12%</li> <li>▶ Cross slope &gt; 7%</li> <li>▶ Obstruction to or in the curb ramp or landing</li> <li>▶ Level change &gt; ¼ inch at the bottom of the curb ramp</li> <li>▶ No detectable warnings</li> </ul> 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
<b>6 (medium)</b>	▶ 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
<b>7 (medium)</b>	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
<b>8 (medium)</b>	Existing curb ramp with any of the following conditions: <ul style="list-style-type: none"> <li>▶ Cross slope &gt; 5%</li> <li>▶ Width &lt; 36 inches</li> <li>▶ Median/island crossings that are inaccessible</li> </ul>
<b>9 (low)</b>	Existing curb ramp with either running slope between 8.3% and 11.9% or insufficient turning space
<b>10 (low)</b>	Existing diagonal curb ramp without a 48-inch extension into the crosswalk
<b>11 (low)</b>	Existing pedestrian push button is not accessible from the sidewalk and/or curb ramp
<b>12 (low)</b>	Existing curb ramp with returned curbs where pedestrian travel across the curb is not protected
<b>13 (low)</b>	All other intersections not prioritized above

**TABLE 6. PRIORITIZATION FACTORS FOR SIDEWALK CORRIDORS**

Criteria	Priority		
	1 (high)	2 (medium)	3 (low)
Cross slope of sidewalk is greater than 2%	Value > 3.5%	3.5% ≥ Value > 2.0%	
Width of sidewalk is less than 48 inches	Value ≤ 36.0"	36.0" < Value < 42.0"	42.0" < Value < 48.0"
Obstruction present along sidewalk	Obstruction - Permanent	Obstruction - Temporary	
Heaving, sinking, or cracking present on sidewalk	Heaving Sinking Cracking		
Ponding on sidewalk		Ponding	
Missing sidewalk			Missing Sidewalk
Signalized cross street cross slope is greater than 5%	Value > 9.0%	9.0% ≥ Value ≥ 7.0%	7.0% > Value > 5.0%
Unsignalized cross street cross slope is greater than 2%	Value > 6.0%	6.0% ≥ Value ≥ 4.0%	4.0% > Value > 2.0%
Cross street running slope is greater than 5%	Value > 7.0%	7.0% ≥ Value ≥ 6.0%	6.0% > Value > 5.0%
Driveway sidewalk width is less than 48 inches	Value ≤ 36.0"	36.0" < Value < 42.0"	42.0" < Value < 48.0"
Driveway (or sidewalk if applicable) cross slope is greater than 2%	Value > 6.0%	6.0% ≥ Value ≥ 4.0%	4.0% > Value > 2.0%
Driveway (or sidewalk if applicable) condition is poor or poor dangerous	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 facility and PSA evaluations are completed, the City will institute an ADA Action Log to monitor corrective actions required under the Transition Plan and document City efforts at compliance with the ADA. At a minimum, the Action Log will identify items that are not ADA compliant and will include anticipated completion dates. The ADA Action Log will be updated on a regular basis and should be available to the public upon request. See an example ADA Action Log provided in [Appendix D](#).

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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 available on the FHWA website: [https://www.fhwa.dot.gov/environment/bicycle\\_pedestrian/funding/](https://www.fhwa.dot.gov/environment/bicycle_pedestrian/funding/)

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

- ▶ Transportation User Fee / Street Maintenance Fee



### 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) Transition Plan for Universal City. The City intends to complete the Self-Evaluation of programs, services, activities, and facilities identified in this document over the next several years. An annual funding amount will be determined in future Transition Plan phases. The City will try to increase the annual Self-Evaluation budget in future years to shorten the anticipated completion schedule.

The next steps for Universal City are:

1. Develop an Action Plan for completing a Self-Evaluation for all City programs, services, activities, and facilities. The next Transition Plan phase is anticipated to begin in fiscal year 2025 to begin evaluation of the pedestrian facilities described in Section 3.4.
2. Complete an inventory and Self-Evaluation for all City programs, services, activities.
3. Complete a compliance evaluation for all City facilities. Facility evaluations should include the following:
  - A. Facility reports with the compliance status of each element evaluated based on the applicable ADA Standards and PROWAG;
  - B. Possible solutions to remove any barriers and bring the element into compliance;
  - C. Estimated costs of possible solutions; and
  - D. Prioritization of the individual facility, independent of other locations of the same facility type.
4. Develop an Implementation Plan, including schedule for completing the recommended facility improvements and funding sources to be used.
5. If a phased Self-Evaluation approach is used, complete remaining Self-Evaluation phases and update the City's ADA Transition Plan after each additional phase.
6. Continue to update the City's ADA Transition Plan as projects are implemented and citizen requests/complaints are received.
7. Determine the best approach for receiving public input on the ADA Transition Plan.



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## **APPENDIX**

### **APPENDIX A: GRIEVANCE PROCEDURE AND PUBLIC NOTICE**

**UNIVERSAL CITY TITLE II GRIEVANCE PROCEDURE**

**UNIVERSAL CITY TITLE II GRIEVANCE FORM**

**PUBLIC NOTICE UNDER THE ADA**

### **APPENDIX B: FEDERAL HIGHWAY ADMINISTRATION ADA TRANSITION PLANS MEMO**

### **APPENDIX C: FACILITY INVENTORY MAPS**

**BUILDINGS**

**PARKS**

**STAND-ALONE PARKING LOTS**

**SIGNALIZED INTERSECTIONS**

**SIDEWALK CORRIDORS**

### **APPENDIX D: SAMPLE ACTION LOG**