

# SANTA ROSA



# ADA



## SELF-EVALUATION AND TRANSITION PLAN UPDATE



Moore Iacofano Goltsman, Inc.

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## **Executive Summary**

### **Introduction**

The Americans with Disabilities Act (ADA) is a civil rights law that mandates equal opportunity for individuals with disabilities. The ADA prohibits discrimination in access to jobs, public accommodations, government services, public transportation, and telecommunications. The City of Santa Rosa has undertaken a comprehensive re-evaluation of its policies, programs, and facilities to determine the extent to which individuals with disabilities may be restricted in their access to City services and activities.

In 1993 the City of Santa Rosa completed its original ADA Self-Evaluation and Transition Plan. This update describes the process developed to complete the re-evaluation of Santa Rosa's activities, provides policy and program recommendations, and presents a Transition Plan Update for the modification of facilities, public rights-of way, and programs to ensure accessibility.

This document will guide the planning and implementation of necessary program and facility modifications over the next several years. The ADA Self-Evaluation and Transition Plan Update is significant in that it establishes the City's ongoing commitment to the development and maintenance of policies, programs, and facilities that include all of its citizenry.

### **Federal Accessibility Requirements**

The City of Santa Rosa 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 ADA Accessibility Guidelines (ADAAG) 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 fifty people. These administrative requirements are:

- Completion of a self-evaluation;
- Development of an ADA complaint procedure;
- Designation of a person who is responsible for overseeing Title II compliance; and
- Development of a transition plan if the self-evaluation identifies any structural modifications necessary for compliance. The transition plan must be retained for three years.

### **State of California Accessibility Requirements**

The California Code of Regulations, Title 24, Part 2 mandates that all publicly funded buildings, structures, and related facilities shall be accessible to and usable by persons with disabilities. These regulations, which are often referred to as Title 24, pertain to Santa Rosa's public buildings, parks, and facilities that were constructed using state, City, or municipal funds or that are owned, leased, rented, contracted, or sublet by the City.

## **ADA Self-Evaluation and Transition Plan Update: Development Process and Summary Findings**

The process developed for the preparation of the ADA Self-Evaluation and Transition Plan Update included program and policy review and prioritization of architectural barriers for removal.

### ***Policies, Procedures, and Programs***

In 2004 the City began a re-evaluation of its policies, programs, and procedures to determine current levels of service and the extent to which its policies and programs created barriers to accessibility for persons with disabilities. A survey of department staff provided information on the nature of the program, forms, and methods used to advertise each program's services and activities, a profile of current participants, the types of equipment and materials used, testing and entrance requirements, the level of staff training, and any special modifications provided.

A public involvement process assisted in the development of this updated Self-Evaluation and Transition Plan. In order to obtain input from the community, the City invited representatives of Community Resources for Independence, the Earle Baum Center of the Blind, the Community Housing Development Corporation, Becoming Independent, and the Council on Aging to meet as an ADA Community Advisory Committee with City staff members and consultants to review each element of the plan and provide comment. Interested members of the public were also invited to attend Committee meetings and provide public comment.

Information provided by department staff, meetings with City staff, and input gathered at public meetings revealed that the City's existing policies, programs, and procedures often present barriers to accessibility for people with disabilities. It is the intent of the City to address citywide programmatic accessibility barriers by providing policies in the following areas:

- Non-Discrimination on the Basis of Disability,
- Facilities, Programs, and Services,
- Public Meetings,
- Communications,
- Staff Training, and
- Funding.

Additionally, when a policy, program, or procedure creates an accessibility barrier that is unique to a department or a certain program, the City's ADA Coordinator will coordinate with the department head or program manager to address the matter in the most reasonable and accommodating manner.

**Facilities Transition Plan Update**

The City conducted a complete survey of architectural barriers in its buildings and facilities during its original Self-Evaluation and Transition Plan process in 1993. Only those areas open to the public were surveyed. A re-evaluation of these facilities and all new facilities is currently underway as part of this current Self-Evaluation and Transition Plan Update. The surveys will provide the City an overview of the architectural barriers that prevent people with disabilities from using its facilities and participating in its programs.

**Facility Surveys**

The survey update process will be accomplished using teams of surveyors equipped with measuring devices, facility diagrams, and survey forms. The surveys identify physical barriers in City facilities based on ADAAG and Title 24 standards. Diagrammatic sketches of each site and building or floor plan are annotated during the survey process and will be included in the facility reports. The diagrams indicate the location of architectural barriers and are numbered to correspond to the *Access Survey Report*. These annotated diagrams will assist City staff in prioritizing barriers for removal. The diagrams provide a visual reference for evaluating the physical and programmatic barriers posed by each architectural barrier.

The elements and their related features addressed in the facility survey include:

**Building or Site Feature**

- Parking Area
- Passenger Loading Zone
- Curb Ramp
- Walk
- Ramp
- Stairway
- Hazard
- Door or Gate
- Sign
- Drinking Fountain
- Telephone
- Building Level or Lift
- Elevator
- Turnstile
- Automated Teller Machine
- Transaction Counter

**Types of Spaces**

- Corridor or Aisle
- Room
- Multiple User Restroom

- Single User Restroom
- Toilet Room
- Bathing Facility
- Locker Room
- Library
- Kitchen/Kitchenette
- Eating Area/Vending Machines
- Auditorium
- Area of Rescue Assistance

**Recreation Features**

- Games and Sports Area
- Grandstand/Bleachers
- Swimming Pool/Wading Pool/Spa
- Picnic Area
- Site Furnishings: Fixed Trash/Recycling
- Fixed Bench
- Utilities in Recreation Areas
- Play Equipment Area
- Fishing Piers and Platforms
- Boating Facilities
- Golf Course

### *Facility Reports*

A facility report will be produced for each site and building, detailing each item found to be in noncompliance with ADAAG and Title 24 standards. The facility report for each site includes:

- *Access Survey Report:* **Each specific barrier** encountered during the survey process is listed.
- *Conceptual Solution:* A feasible conceptual solution to resolving the barrier is provided in text format.
- *Cost Estimate:* A cost estimate is provided for the removal of each barrier.
- *Priority Level:* A priority is given for each barrier removal.
- *Reference Map:* A reference map locates the barriers at each building, facility, and park.

### *Removal of Architectural Barriers*

Recognizing that the City has limited funds and cannot immediately make all buildings and facilities fully accessible, City staff will utilize the following criteria as the basis for prioritizing the removal of architectural barriers:

- *Quantity and frequency* of public use.
- *Uniqueness of the facility:* Can the programs offered in this facility be shifted to an alternative, accessible location?
- *Age or condition of the facility:* Age or condition should not be major criteria, but can be factors if the building is scheduled to be vacated or demolished.
- *Geographic distribution:* Distribution of services throughout the City.
- *Critical nature of the programs offered at the facility:* Police, medical care, etc.

### *Prioritization of Barrier Removal*

The City will produce a list of Architectural Barrier Removal Projects, which will include those buildings and facilities that receive a high level of use by the public, provide programs and/or services that are unique and cannot occur in another location, and are distributed throughout the City thereby providing maximum access for all residents. The list will include those buildings and facilities that are considered by the City as being its highest priorities for addressing the removal of architectural barriers.

The City of Santa Rosa reserves the right to change the barrier removal priorities on an ongoing basis in order to allow flexibility in accommodating community requests, petitions for reasonable modifications from persons with disabilities, and changes in City programs.

It is the intent of the City to have its ADA Coordinator work together with department heads and budget staff to determine the funding sources for architectural barrier removal projects. Once funding is identified, the ADA Coordinator will coordinate the placement of the projects in the City's Capital Improvement Plan to be addressed on a fiscal year basis.

***Sidewalks and Curb Ramps Transition Plan***

The Transition Plan for Sidewalks and Curb Ramps combines the findings of the review of policies, procedures, and design standards regarding sidewalks and curb ramps with the City’s ongoing curb ramp inventory. The City of Santa Rosa Public Works staff, with input from the ADA Community Advisory Committee, has documented the City’s approach to providing a prioritized plan for pedestrian access within the Public Right-of-Way.

Although the City has already instituted a number of programs to increase pedestrian accessibility—the development and infill program; the Citizen Request program; the annual installation, repair, and maintenance program; street-related capital improvement projects; and street overlay construction projects, it will expand these programs where possible in order to meet its overall goals.

***Sidewalk Inventory***

All areas within the incorporated City of Santa Rosa will eventually be included in the sidewalk inventory. The following priorities will be used to determine the order of inventory of the sidewalks and to classify the roadway segments located within the City. The inventory order within each priority level was determined with assistance from the ADA Community Advisory Committee.

*Priority Level 1* (high priority)

- Arterial streets as classified in the City of Santa Rosa General Plan.
- Connecting roadway segments serving state and local government buildings including but not limited to: City- and County-owned facilities; public schools including Santa Rosa Junior College; hospitals, health centers, and clinics (public/private); public housing and shelters; bus lines and transit stations; and parks.

*Priority Level 2* (medium priority)

- Collector streets as classified in the City of Santa Rosa General Plan.
- Connecting roadway segments serving public accommodations including but not limited to: shopping malls, supermarkets, and strip retail centers; major employment sites; housing complexes, including large apartment complexes.

*Priority Level 3* (low priority)

- Single-family residential areas.
- Industrial areas.
- Other areas not classified as Priority Level 1 or 2.

***Prioritization of Curb Ramp Repair, Replacement, and New Construction***

Criteria were developed for prioritizing new curb ramp construction and alterations. The categories that will be used to rank curb ramp improvements are:

- Repair of hazardous conditions,
- Installation of new curb ramps to connect existing sidewalks, and

- Repair of existing curb ramps.

It is the goal of the City to continue its efforts to improve pedestrian accessibility. To achieve its goal, the City plans to utilize the following criteria to guide its sidewalk and curb ramp program:

- Provide access to state or local governmental facilities or offices.
- Provide access to places of public accommodation.
- Provide access to public transit.
- Enhance safety at pedestrian crossings.
- Create connected systems of accessible pathways.

### ***Undue Burden***

The City does not have to take any action that it can demonstrate would result in a fundamental alteration in the nature of a program or activity, would create a hazardous condition for other people, or would represent an undue financial and administrative burden.

The determination that an undue financial burden would result must be based on an evaluation of all resources available for use in a program. For example, if a barrier removal action is judged unduly burdensome, the City must consider other options for providing access that would ensure that individuals with disabilities receive the benefits and services of the program or activity.

### ***Ongoing Accessibility Improvements***

Opportunities for further improvement of City services and facilities will continue to arise as advances are made in technology and the provision of programs for people with disabilities. Additionally, as the City acquires new facilities and develops new programs, it will be necessary to review each of them for access compliance.

It is the intent of the City to keep its programs up-to-date through increased community involvement and partnerships with organizations of, and those offering services to, persons with disabilities.

### ***Measuring the Success of the ADA Self-Evaluation and Transition Plan Update***

It is the intent of the City to periodically evaluate the success of improving access to its programs by compiling statistical measures of success. Examples of some potential measures of success include:

- Measuring the level of public participation in programs.
- Revising evaluation forms to include questions about how adequately special needs were met.
- Tracking the number of people with disabilities who participate in selected programs.
- Tracking the number of requests for programs that are accessible to people with disabilities.

- Tracking attendance and repeat registrants.
- Asking staff to evaluate the success of a program.
- Surveying program participants about desired improvements.
- Conducting an initial assessment/suggestion box program for accessibility.
- Soliciting feedback from personal contact (such as word-of-mouth reports).
- Comparing programs to goals and objectives published by the federal government.
- Preparing and distributing a participants' questionnaire to measure increases in participation and other appropriate measures.

### ***Complaint Procedure***

As part of the Self-Evaluation and Transition Plan Update process, the City of Santa Rosa has revised and adopted a uniform complaint procedure to resolve complaints related to discrimination under the ADA.

### ***Program Accessibility Resources and Toolkit***

In order to facilitate access to City programs by all citizens, the City will assemble a toolkit of resources and information designed to assist its staff in communicating with and providing Public Service to individuals with a variety of disabilities. The City will periodically review the components of the toolkit, as new technologies become available, in order to ensure that the best types of technology are being used to improve accessibility to City services and programs.

# 1.0 ADA Self-Evaluation and Transition Plan Update: Development Process

## 1.1 Introduction

### 1.1.1 Overview

The Americans with Disabilities Act (ADA) is a comprehensive civil rights law for persons with disabilities in both employment and the provision of goods and services. The ADA states that its purpose is to provide a “clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities.” Congress emphasized that the ADA seeks to dispel stereotypes and assumptions about disabilities and to assure equality of opportunity, full participation, independent living, and economic self-sufficiency for people with disabilities. Appendix A provides definitions for terms used in this report that are found in the ADA and the ADA Accessibility Guidelines (ADAAG).

This update to the City’s ADA Self-Evaluation and Transition Plan is prepared in fulfillment of the requirements set forth in Title II of the ADA. The ADA states that a public entity must reasonably modify its policies, practices, or procedures to avoid discrimination against people with disabilities. In 1993 City of Santa Rosa completed its original ADA Self-Evaluation and Transition Plan. This update will assist the City of Santa Rosa in identifying current policy, program, and physical barriers to accessibility and in developing barrier removal solutions that will facilitate the opportunity of access to all individuals.

This report describes the process by which policies, programs, and facilities were evaluated for compliance with the ADA; presents the findings of that evaluation; and provides recommendations for ensuring accessibility. This part provides an overview of the requirements and process for developing the Self-Evaluation and Transition Plan Update. The next two parts detail the findings and action steps related to providing accessible policies, procedures, and programs (Part 2) and those related to the City’s program for providing accessible buildings and facilities (Part 3). Part 4 outlines the City’s complaint procedures for disability discrimination. Part 5 is the City’s transition plan for sidewalks and curb ramps in pedestrian rights-of-way. Part 6 describes suggested components of the City’s program accessibility resources and toolkit.

### 1.1.2 Legislative Mandate

The development of a transition plan is a requirement of the federal regulations implementing the Rehabilitation Act of 1973, which require that all organizations receiving federal funds make their programs available without discrimination toward people with disabilities. The Act, which has become known as the “civil rights act” of persons with disabilities, states that:

*No otherwise qualified handicapped individual in the United States shall, solely by reason of handicap, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. (Section 504)*

Subsequent to the enactment of the Rehabilitation Act, Congress passed the Americans with Disabilities Act (ADA) on July 26, 1990. Santa Rosa is obligated to observe all requirements of Title I of the ADA in its employment practices; Title II in its policies, programs, and services; any parts of Titles IV and V that apply to the City, its programs, services, or facilities; and all requirements specified in the ADA Accessibility Guidelines (ADAAG) that apply to facilities and other physical holdings. The Department of Justice's Title II regulation adopts the general prohibitions of discrimination established under Section 504 and incorporates specific prohibitions of discrimination for the ADA. Title II provides protections to individuals with disabilities that are at least equal to those provided by the nondiscrimination provisions of Title V of the Rehabilitation Act.

This legislative mandate, therefore, prohibits the City of Santa Rosa from, either directly or through contractual arrangements:

- Denying persons with disabilities the opportunity to participate in services, programs, or activities that are not separate or different from those offered others, even if the City offers permissibly separate or different activities.
- In determining the location of facilities, making selections that have the effect of excluding or discriminating against persons with disabilities.

Title II of the ADA stipulates that public entities must identify and evaluate all programs, activities, and services and review all policies, practices, and procedures that govern administration of the programs, activities, and services for all government entities employing more than fifty people. These administrative requirements include:

- Completion of a self-evaluation;
- Development of an ADA complaint procedure;
- Designation of a person who is responsible for overseeing Title II compliance; and
- Development of a transition plan if the self-evaluation identifies any structural modifications necessary for compliance. The transition plan must be retained for three years.

This report and certain documents incorporated by reference establish the ADA Self-Evaluation and Transition Plan Update for the City of Santa Rosa.

In addition, the California Code of Regulations, Title 24, Part 2 mandates that all publicly funded buildings, structures, and related facilities shall be accessible to and usable by persons with disabilities. These regulations, which are often referred to as Title 24, pertain to Santa Rosa's public buildings and facilities that were constructed using state, City, or municipal funds or that are owned, leased, rented, contracted, or sublet by the City. Title 24 regulations and standards were also incorporated in the evaluation of architectural barriers as part of the Transition Plan Update.

### **1.1.3 Discrimination and Accessibility**

There are two types of accessibility: physical accessibility and program accessibility. Absence of discrimination requires that both types of accessibility be provided.

The ADA establishes requirements to ensure that buildings and facilities are accessible to and usable by people with disabilities. Design guidelines to achieve accessibility have been developed and are maintained by the U.S. Access Board under the jurisdiction of the ADA. The ADA Accessibility Guidelines (ADAAG) cover a wide variety of facilities (including buildings, outdoor recreation areas, and curb ramps) and establish minimum accessibility requirements for new construction and alterations to these facilities. The City may achieve physical accessibility by ensuring that a facility is barrier-free and meets ADAAG technical requirements and State of California standards, including those found in Title 24. Barriers include any obstacles that prevent or restrict the entrance to or use of a facility.

Programmatic accessibility includes physical accessibility, but also entails all policies, practices, and procedures that permit people with disabilities to participate in programs and to access important information. Program accessibility requires that individuals with disabilities be provided an equally effective opportunity to participate in or benefit from a public entity's programs and services.

The City may achieve program accessibility by a number of methods, both structural and non-structural:

- Structural methods such as altering an existing facility;
- Acquisition or redesign of equipment;
- Assignment of aides; and/or
- Providing services at alternate accessible sites.

When choosing a method of providing program access, the City will give priority to the one that results in the most integrated setting appropriate to encourage interaction among all users, including individuals with disabilities. In compliance with the requirements of the ADA, the City provides equality of opportunity but does not guarantee equality of results.

### **1.1.4 Undue Burden**

The City does not have to take any action that it can demonstrate would result in a fundamental alteration in the nature of a program or activity, would create a hazardous condition for other people, or would represent an undue financial and administrative burden. This determination can only be made by the ADA Coordinator, department head, or designee and must be accompanied by a statement citing the reasons for reaching that conclusion.

The determination that an undue financial burden would result must be based on an evaluation of all resources available for use in a program. For example, if a barrier removal action is judged

unduly burdensome, the City must consider other options for providing access that would ensure that individuals with disabilities receive the benefits and services of the program or activity.

## **1.2 ADA Self-Evaluation and Transition Plan Update Development Requirements**

The Self-Evaluation Update is the City's assessment of its current policies, practices, and procedures. It identifies and corrects those policies and practices that are inconsistent with the requirements of Title II of the ADA. In keeping with these requirements and as part of the Self-Evaluation Update, the City of Santa Rosa:

- Identified its current programs, activities, and services; and
- Reviewed the current policies, practices, and procedures that govern the administration of its programs, activities, and services.

The ADA also sets forth specific requirements for preparation of an acceptable Transition Plan. At a minimum, the elements of the plan should include:

- A list of the current physical barriers in City facilities that limit the accessibility of its programs, activities, or services to individuals with disabilities;
- A detailed outline of the methods to be used to remove these barriers and meet the current standards and accessibility regulations;
- A schedule for taking the steps necessary to achieve compliance with Title II of the ADA; and
- The name of the individual responsible for the plan's implementation.

## **1.3 ADA Self-Evaluation and Transition Plan Update Development Process**

The process developed and implemented to update Santa Rosa's ADA Self-Evaluation and Transition Plan included meetings with department heads and staff; the review of program accessibility questionnaires; a review of the City's published rules and regulations; a survey to identify physical barriers to public facilities and rights-of way, and a public involvement process to obtain input and to review the ADA Self-Evaluation and Transition Plan Update recommendations.

### **1.3.1 Introduction**

Services and programs offered by Santa Rosa to the public must be accessible. Accessibility applies to all aspects of a program or service, including advertisement, orientation, eligibility, participation, testing or evaluation, physical access, provision of auxiliary aids, and transportation.

The goals of the Self-Evaluation Update were:

1. To develop policy recommendations for the City and each of its departments, divisions, and programs;
2. To ensure that the views of the disability community are included in the City's policies; and
3. To foster ties between City staff and representatives of the disability community.

The process of making City facilities and programs accessible to all individuals will be an ongoing one, and the City will continue to review accessibility issues such as resolution of complaints and reasonable modifications to programs. The City will also periodically evaluate the success of improving access to programs by the practices and procedures developed during the Self-Evaluation Update process.

The evaluation of the services and programs of the City of Santa Rosa included the following activities.

### **1.3.2 Review and Update of General Policies**

The following is the process the City underwent in completing the ADA Self-Evaluation and Transition Plan Update of the City's general policies.

- All the existing policies were divided among several three-person committees. Each committee member was part of the in-house task force.
- Each committee wrote up changes to their revised policies with rationales for all changes.
- Each policy was presented for review to the entire in-house task force over the course of four meetings.
- The agreed-upon policies were presented to the ADA Community Advisory Committee for comments and recommendation.
- Any changes to the policy were discussed with the in-house task force then either approved or negotiated.
- The policies will be presented to the City Council for adoption.
- After adoption, each policy will have an implementation plan with a time frame for completion and a person responsible for monitoring the implementation process.

### **1.3.3 Review and Update of Department Policies**

The following is the process each department underwent in completing its policy review for the ADA Self-Evaluation and Transition Plan Update.

1. Each department identified their own policies that needed revision.
2. Each department formed a committee to revise any policies that may discriminate against people with disabilities.

3. Each department wrote up their own revised policies and presented it for review to the in-house task force along with the rationale for any changes to existing policies.
4. The agreed-upon policies were then presented to the ADA Community Advisory Committee for comments and recommendations.
5. Any changes to the policy were then discussed with the in-house task force that either approved the changes or negotiated additional changes.
6. The policies will be presented to the City Council for adoption.
7. After adoption, each policy will have an implementation plan with a time frame for completion and a person responsible for monitoring the implementation process.

### **1.3.4 Program Accessibility Questionnaire**

The Self-Evaluation of Santa Rosa's services, programs, and activities required and involved the participation of every department and division of the City. This was accomplished by a department-by-department review of the City's original ADA Self-Evaluation and Transition Plan and a program accessibility questionnaire, which solicited information about current policies and programs in the following categories:

- A summary of the program and its purpose, the specific activities that comprise the program, and the nature of any advertising or program material produced;
- Any program or admission eligibility requirements;
- An overview of participation in the program, including who participates and how participation is facilitated;
- The methods used by the department to provide accessibility;
- Any access complaints or requests for improving access to the program;
- A list of facilities, or portions of facilities, used for the program and the activity that takes place there;
- Program providers, including outside organizations;
- Transportation;
- Communication, including audiovisual presentations and the City's website; and
- Emergency evacuation procedures.

The Program Accessibility Questionnaire for Program Providers is provided in Appendix B.

The following is the process each department underwent in reviewing the program accessibility questionnaire for the ADA Self-Evaluation and Transition Plan Update.

1. Each department used the questionnaire to identify how department staff members are specifically accommodating people with disabilities or if there were deficiencies or gaps in accommodations.
2. Each department developed a list of recommendations that will help them meet their obligations under the ADA.
3. Each department wrote up their analysis and recommendations and presented it to the in-house task force.
4. The recommendations will be presented to the City Council for approval.

### **1.3.5 Review of Published Rules and Regulations**

The published policies and practices of the City of Santa Rosa were reviewed by the City Attorney's Office to determine whether services offered are and/or language used is discriminatory to people with disabilities. Council policies were reviewed and updated as necessary. All policies and practices are reviewed before adoption to assure compliance with non-discrimination clauses.

### **1.3.6 Public Participation Process**

A public involvement process assisted in the development of this updated Self-Evaluation and Transition Plan. In order to obtain input from the community, the City invited representatives of Community Resources for Independence, the Earle Baum Center of the Blind, the Community Housing Development Corporation, Becoming Independent, and the Council on Aging to meet as an ADA Community Advisory Committee with City staff members and consultants to review each element of the plan and provide comment. Interested members of the public were also invited to attend Committee meetings and provide public comment. (A list of ADA Community Advisory Committee members is provided in Appendix C.)

The following is the schedule of Committee meetings and topics addressed at each meeting.

#### *December 1, 2004 Meeting*

- ADA Complaint/Grievance Procedure
- ADA Street Improvement Priority Plan
- Curb Ramp Priority Plan
- Construction Guidelines

#### *December 14, 2004 Meeting—General City Policies and Practices*

- Non-Discrimination Policy
- Facilities, Programs, and Services Policy
- Public Meetings Policy
- Communications Policy

#### *January 18, 2005 Meeting—General City Policies and Practices*

- City Website
- Staff Training Policy
- Review of Updates to Non-Discrimination Policy

#### *February 7, 2005—Department-Specific Policies*

- Administrative Services Department
- City Attorney's Office
- City Manager's Office
- Fire Department
- Human Resources Department
- Public Works Department

*February 23, 2005 Meeting—Department-Specific Policies*

- Community Development Department
- Department of Economic Development and Housing
- Police Department
- Recreation and Parks Department
- Transit and Parking Department
  - Parking Division
  - Transit Division
- Utilities Department

#### **1.4 Facilities Transition Plan Update**

The City conducted a complete survey of architectural barriers in its buildings and facilities during its original Self-Evaluation and Transition Plan process in 1993. Only those areas open to the public were surveyed. A re-evaluation of these facilities and all new facilities is currently underway as part of this current Self-Evaluation and Transition Plan Update. The surveys will provide the City an overview of the architectural barriers that prevent people with disabilities from using its facilities and participating in its programs.

The following is the process the City underwent in completing its ADA Facilities Transition Plan Update.

1. Using the previous Transition Plan priorities, all access projects that have been done in the last ten years were identified and listed under each facility with the approximate construction costs.
2. All facilities that have been added to the City's inventory in the last ten years were identified and those facilities used by the public were surveyed for access.
3. A report will be generated for each surveyed facility.
4. The City will create a new facility priority list for barrier removal across all City facilities.
5. Each barrier removal project will be tied to the Capital Improvement Program (CIP). A timeline will be identified for each priority project. A responsible individual will be identified to ensure implementation.
6. The agreed upon priority list will be reviewed by the ADA Community Advisory Committee.
7. The final priority list will be presented to City Council for approval.

#### **1.5 Sidewalks and Curb Ramps Transition Plan**

The following is the process the City underwent in developing a Sidewalks and Curb Ramps Transition Plan as part of the ADA Self-Evaluation and Transition Plan Update.

1. Using the priorities adopted by the City, the Public Works Department developed a streets and sidewalk improvement plan.
2. The improvement plan was mapped and presented to the in-house task force for comment.

3. The agreed-upon plan was presented to the ADA Community Advisory Committee for comment.
4. The plan will be revised as necessary and costs for implementing the plan will be estimated.
5. The plan will be integrated into the CIP with a timeline for implementation and a person who will be responsible for overseeing the work.

## **2.0 Policies, Procedures, and Program Accessibility Findings and Action Steps**

### **2.1 Introduction**

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

#### **2.1.1 Overview**

The following sections detail the review by City staff and members of the public of current citywide policies, services, programs, and activities (Section 2.2) and a review of the policies and programs of the following departments and divisions (Section 2.3):

- **Administrative Services Department**
  - Information Technology
  - Facilities Maintenance
  - Purchasing and Stores
  - Facilities Planning
- **City Attorney's Office**
- **City Manager's Office**
- **Community Development Department**
  - Building Division
  - Engineering Division
  - Planning Division
- **Department of Economic Development and Housing**
- **Fire Department**
- **Human Resources Department**
- **Police Department**
- **Public Works Department**
- **Recreation and Parks Department**
- **Transit and Parking Department**
  - Parking Division
  - Transit Division
- **Utilities Department**

## **2.1.2 Action Steps**

### *General Policies and Practices*

Action steps are provided in Section 2.2 for citywide programmatic accessibility barriers in the following policy areas:

- Non-Discrimination on the Basis of Disability;
- Facilities, Programs, and Services;
- Public Meetings;
- Communications;
- Staff Training; and
- Funding.

### *Department-Specific Action Steps*

Program summary reports for specific City departments, divisions, and programs are provided in Section 2.3. Each of those specific reports includes a description of programs and services and action steps; which will also be included in each department's policy manual.

## **2.1.3 Time Frames for Completion**

It is the City's goal to have a plan in place to address all of the citywide policies, programs, and procedures that act as barriers to accessibility within the time frame indicated for each action step. In those situations where a policy, program, or procedure creates an accessibility barrier that is unique to a department or a particular program, the City intends to address the removal of the barrier in the most reasonable and expeditious manner.

## **2.2 Action Steps — City of Santa Rosa General Policies and Practices**

Following is a list of general policies and practices, which will affect all City departments. These should be added to the specific departmental policies and practices and made part of each department's ADA implementation strategy to guide the administration of programs.

### **2.2.1 Non-Discrimination Policy**

#### *Notice Requirements*

- The following notice regarding the City's commitment to providing accessible services will be posted on the City of Santa Rosa's Internet site. *Time frame for completion:* This policy is currently in place.

## **POLICY ON NON-DISCRIMINATION ON THE BASIS OF DISABILITY**

The City of Santa Rosa does not discriminate on the basis of disability in the admissions or access to, or treatment or employment in, its programs or activities.

The ADA Coordinator has been designated to coordinate compliance with the nondiscrimination requirements contained in the Department of Justice regulations implementing Subtitle A of Title II of the Americans with Disabilities Act (42 U.S.C. 12131), which prohibits discrimination on the basis on disability by public agencies. The ADA Coordinator may be reached at:

City of Santa Rosa  
100 Santa Rosa Ave.  
Santa Rosa, CA 95404  
(707) 543-3010 (Phone)  
(707) 543-3031 (TDD)  
(707) 543-3030 (FAX)  
[ada@srcity.org](mailto:ada@srcity.org) (email)

### **2.2.2 Facilities, Programs, and Services Policy**

#### ***General***

The City of Santa Rosa supports the ADA requirements and guidelines.

Every effort shall be made to hold City-sponsored programs in facilities that are accessible according to California State Title 24 and the Americans with Disabilities Act Guidelines.

- The City will maintain in working order equipment and features of facilities that are required to provide ready access to individuals with disabilities.
- The City will ensure that individuals with disabilities are not excluded from regular programs. Individuals with disabilities will be integrated into regular programs to the maximum extent appropriate.
- The City will ensure that where specific requirements are necessary for the safe operations of programs, those requirements are based on real risk, not on speculation, stereotypes, or generalizations about individuals with disabilities.
- The City will modify policies, practices, and procedures to avoid discrimination unless the modification would fundamentally alter the nature of the program or create a hazardous situation.
- It is not required that each existing facility be accessible. This standard, known as “program accessibility,” must be provided by methods including alteration of existing facilities, acquisition or construction of additional facilities, relocation of a service or program to an accessible facility, or provision of services at alternate sites.

### ***Requests for Accommodations***

- Specific requests for accommodations may be made directly to the department involved or through the ADA Coordinator. A *Reasonable Accommodation Request Form* is also available on the Internet site (see “ADA” under “Find It Fast” on the City of Santa Rosa’s Internet site – currently at [www.ci.santa-rosa.ca.us](http://www.ci.santa-rosa.ca.us)).
- The determination whether to provide an accommodation is made on a case-by-case basis. This is an individual process through which the department and the individual with a disability discuss and arrange for the necessary (and reasonable) accommodations. In assessing the accommodation, the City will give priority consideration to program accommodations that will be consistent with provision of services, programs, and activities in the most integrated setting appropriate to qualified individuals with disabilities.
- Accommodations may include, but are not limited to, making reasonable modifications in policies, practices, and procedures; furnishings, auxiliary aids, and services; and making services, programs, or activities accessible, usable, and integrated wherever appropriate. Specific lists of types of accommodation are not included in this policy as they vary depending on program and individual needs and also by types of accommodation available.
- In-person requests for services or information at a counter will be handled on an individual basis, and the individual and the department will determine an appropriate accommodation for the individual.
- A complaint procedure is available at the City of Santa Rosa’s Internet site for those situations where the individual and the City representative might disagree about what is reasonable, appropriate, and/or necessary.

### ***Tours of City Facilities***

- When the City provides transportation to a tour site, accessible transportation will be provided when requested. *Time frame for completion:* This policy is currently in place.
- If the route or portions of the route are not accessible, the tour will be rerouted or the department providing the tour will determine an alternate accommodation (e.g., photographs, close-captioned videos, etc.) that will allow the tour to be experienced. *Time frame for completion:* January to December 2007.

### ***Special Events***

- In situations where private organizations sponsor events in the City’s facilities, the City of Santa Rosa will require private organizations to comply with applicable ADA requirements. The City will provide a checklist and information during the application process to inform organizer of their responsibility for accessibility under the ADA requirements. The checklist and information will be available on the City of Santa Rosa’s ADA website. *Time frame for completion:* January to March 2006.

### ***Equipment***

- Specialized equipment may be available to assist persons with disabilities to participate in programs. A list of resources is available on the City of Santa Rosa’s ADA website. *Time*

*frame for completion:* January to July 2006.

- The City will request that the phone company provide an amplification device, a shelf, and a text telephone (TDD/TTY) or an outlet for a text telephone at each site where a TDD/TTY is required. *Time frame for completion:* January to July 2006.

### ***Purchasing***

- The City will evaluate all future computer hardware and software purchases with potential public access for their compatibility with accessibility-related adaptive equipment and software. Adaptive aids are devices, controls, appliances, or items that make it possible for persons with disabilities to improve their abilities to function independently and participate in programs, services, and activities offered by the City. *Time frame for completion:* January to December 2006.
- Accessibility will be included in the criteria for selecting items. *Time frame for completion:* January to July 2006.
- The City will evaluate furniture and building materials purchases for compatibility with a wide range of disabilities and sensitivities in areas that will be open to the public. Items could include those that are easily adjustable or can be modified to accommodate a variety of physical and ergonomic needs such as furniture, site furnishings, lighting, and office systems, and items such as certain types of paint that may be harmful to people with environmental sensitivities. *Time frame for completion:* January to July 2006.

### ***Evacuation***

- All City departments shall establish emergency evacuation procedures to safely evacuate persons with disabilities who may need special assistance in an emergency. Each department will have their own specifics based on program. *Time frame for completion:* January to December 2006.
- Existing procedures dealing with emergencies shall be reviewed to ensure that persons with disabilities can be alerted and that they can alert emergency service providers. All evacuation policies and procedures will be made available in alternative formats upon request. *Time frame for completion:* January to December 2006.
- A plan will be developed to identify people with disabilities who may require special assistance in the event of an emergency. *Time frame for completion:* January to December 2006.
- The City will provide American Sign Language interpreters at emergency facilities, on an as-needed basis. *Time frame for completion:* This policy is currently in place.

### **2.2.3 Public Meetings Policy**

- Public meetings will be scheduled in accessible locations whenever possible. An accessible location includes, but is not limited to, the following: accessible restrooms, wheelchair access, accessible parking, an accessible route, temperature control, and the ability to provide access to fresh air for people with chemical sensitivities. *Time frame for completion:* This policy is currently in place.

- When a fully accessible site is not available, reasonable accommodations will be made so that an individual with a disability can participate. *Time frame for completion:* This policy is currently in place.
- Information will be available to City staff on the types of accommodation requests that may be made by persons with different types of disabilities. This will include information about auxiliary aids such as different types of assistive listening systems, sign language interpreters, readers, descriptive services, and other assistive technologies such as “real-time captioning.” *Time frame for completion:* January to December 2006.
- A notice will be displayed on meeting agendas indicating the availability of accessibility accommodations. *Time frame for completion:* This policy is currently in place.
- Agendas will be provided in alternative formats, when requested. *Time frame for completion:* This policy is currently in place.
- Individuals with communication difficulties will be provided flexibility in the time limit on speaking. *Time frame for completion:* This policy is currently in place.
- The availability of American Sign Language (ASL) interpreters and assistive listening devices will be included in all meeting announcements as follows:  
*Disability-related aids or services, including printed information in alternate formats, to enable persons with disabilities to participate in public meetings are available by contacting the “appropriate office” at “phone number” one week prior to the meeting.*  
*Time frame for completion:* This policy is currently in place.
- The City will maintain a resource list of on-call American Sign Language interpreters who may be brought to meetings to assist individuals with hearing impairments. *Time frame for completion:* This policy is currently in place.
- The City will maintain a list of already accessible meeting spaces to facilitate the scheduling of meetings and/or the relocation of meetings upon request. *Time frame for completion:* January to July 2006.

## 2.2.4 Communications Policy

### *General*

- A communication tool kit will be developed to help educate employees and staff on City policies for providing communications to people with various disabilities in a uniform and consistent manner. This tool kit will be located on the City’s Intranet. *Time frame for completion:* January to July 2006.
- Public information will be available on how to request sign language interpreters, equipment that enhances hearing, or other appropriate accommodations. *Time frame for completion:* January to March 2006.
- Requests for reasonable accommodations will be responded to within a 2-business day notice to the department providing the program or service. *Time frame for completion:* This policy is currently in place.
- Departments will provide appropriate auxiliary aids and services where necessary to ensure effective communication with individuals with disabilities, unless doing so would result in a

fundamental alteration to the program or service or if providing that aid or service results in an undue burden as defined by law. *Time frame for completion:* This policy is currently in place.

- The City will provide public information digitally if possible or scanned onto a computer disk when requested or where digital format is not feasible (see requests for lengthy printed material below). *Time frame for completion:* This policy is currently in place.

### **City Website**

- A website on the City of Santa Rosa's Internet will be the centralized point of information related to ADA. The City will use the City website and maintain a site for public access related to ADA on City programs, projects, and services. The International Protocol for Accessibility will be the standard for the City's websites. *Time frame for completion:* This policy is currently in place and updates to the website are ongoing.
- Comments or suggestions for additions to the City website, such as adding links to the ADA web page or specific department web pages and/or adding text documents and forms, may be submitted to the ADA Coordinator. *Time frame for completion:* This policy is currently in place and updates to the website are ongoing.

### **Printed Information**

- Each department will be provided information on how to produce printed material in alternative formats for people with various disabilities to ensure that requests are handled in a uniform and consistent manner (see the communications tool kit above). *Time frame for completion:* January to July 2006.
- Requests for specialized formats of lengthy and/or bulky documents will be handled on an individual basis. *Time frame for completion:* This policy is currently in place.
- Any charge for a publication will be uniform for all formats of that publication. *Time frame for completion:* This policy is currently in place.
- The City will make program information more widely available to all City residents by:
  - Publicizing and making available program brochures in alternative formats when requested. *Time frame for completion:* This policy is currently in place.
  - Ensuring uniformity of charges for a publication for all formats of that publication. *Time frame for completion:* This policy is currently in place.
- On City-related printed material distributed to the public regarding programs, there will be reference to:
  - The City's Non-discrimination Policy, and
  - The phone number of the program access specialist and/or the City's ADA coordinator and/or other contact information on who can provide assistance in meeting special requests.*Time frame for completion:* January to December 2006.
- Information on the City's efforts to comply with the ADA will be available on request and periodically updated on the City's website. *Time frame for completion:* January to July 2006.

### ***Outreach of Information***

- The City will use various media for outreach of its information on accessibility. *Time frame for completion:* January to December 2006.
- A committee of interested community members will be maintained as an advisory committee to assist in this outreach effort and monitor its effectiveness. *Time frame for completion:* This policy is currently in place.

### ***Signs***

- City directional and informational signs are designed as needed to include accessibility standards. *Time frame for completion:* This policy is currently in place.
- When signs are replaced, they will provide appropriate information regarding accessibility. Priority will be given for signs related to public access. *Time frame for completion:* This policy is currently ongoing.
- The International Symbol of Accessibility (ISA) will be included wherever required on directional and informational signs (and on the City's web pages) and the City will consider its use whenever possible. *Time frame for completion:* January to July 2006.
- Rules or policies that relate to safety or instruction at a particular site will be provided in an accessible format, where possible. *Time frame for completion:* July 2006 to December 2008.

### **2.2.5 Staff Training Policy**

- The ADA Coordinator or his/her designee will monitor and oversee the ADA training requirements. *Time frame for completion:* January 2006 to December 2007.
- All employees shall be trained in ADA policies applicable to their departments and positions and receive information on how to access accommodation information. *Time frame for completion:* January 2006 to December 2007 and ongoing.
- One manager in each department will be trained to serve as the department's Disability Access Liaison. The Liaison will be required to complete a training program and attend periodic retraining regarding accessibility issues. *Time frame for completion:* January to December 2006 and ongoing.
- Appropriate staff will receive specialized training on how to make programs accessible to persons with disabilities, including training in the use of specialized equipment, such as wheelchair lifts, pool lifts, and assistive listening devices. *Time frame for completion:* January to July 2006 and ongoing.
- Inspections staff will be trained in respect to compliance with various codes and standards to achieve accessibility. *Time frame for completion:* January 2006 to December 2007 and ongoing.
- Appropriate City staff members will be provided with training in general building evacuation procedures for assisting people with hearing, visual, mobility, and learning disabilities in an emergency. *Time frame for completion:* January to December 2006 and ongoing.

- Training in website design and updates for employees will include training on website accessibility. *Time frame for completion:* January to December 2006 and ongoing.

### **2.2.6 Funding Policy**

- ADA compliance is one of the evaluation criteria used in allocating money for the Capital Improvement Program (CIP). A portion of Capital Improvement Program funding will be allocated to ADA retrofitting each year.
- ADA compliance costs will be identified for each CIP project and a summary of those costs will be available on the City website. *Time frame for completion:* January to December 2006.
- Where participant fees are required for programs and activities, a surcharge to all participants can be included to help fund accommodations for accessibility.
- Where a reasonable accommodation is needed, the cost will not be carried by the individual. It is the responsibility of the department to identify, request funds, support, and ensure the accommodation. The individual shall notify the department of the accommodation in writing with a *Reasonable Accommodation Request Form* available on the Internet. *Time frame for completion:* This policy is currently in place.

## 2.3 City of Santa Rosa Department-Specific Policies

### 2.3.1 Administrative Services Department

#### Description of Programs and Services

Administrative Services includes Accounting, Facilities Management, Planning, Information Technology (computer and telecommunications systems), Purchasing and Stores, and Utilities Billing. Most department activities are located at the City Annex and Municipal Service Center North.

#### Administrative Services Department Action Steps

Following is a list of policies and practices that are specific to the Administrative Services Department. These should be combined with the City's general policies to complete the department's policies to implement the ADA.

##### *Information Technology*

- The City will provide reasonable accommodation for software, hardware, and telecommunications on a case-by-case basis and Administrative Services will coordinate standardization. *Time frame for completion:* This policy is currently in place.
- The City will evaluate all future computer hardware and software purchases for their compatibility with accessibility-related adaptive equipment and software (see *Purchasing* under *General Policies*). *Time frame for completion:* January to December 2006.
- The City will maintain an accessible website by following universally adopted standards for accessible website design (see *Communications* under *General Policies*). *Time frame for completion:* This policy is currently in place.
- The City will maintain information to support and educate its employees and the community on accessibility issues.

##### *Facilities Maintenance*

- Where available, priority should be given to choosing unscented cleaning products and those that are not toxic to most persons. *Time frame for completion:* This policy is currently in place.
- When performing major construction projects, non-housekeeping chemical treatment, or painting, a notice will be provided before the treatment in order to alert individuals with chemical sensitivities of the possible presence of chemical residues and for general informational purposes. *Time frame for completion:* This policy is currently in place.
- A janitorial maintenance schedule will be available for each City facility on request. *Time frame for completion:* This policy is currently in place.
- When a building is toxic for individuals with chemical sensitivities, reasonable accommodations will be made. *Time frame for completion:* This policy is currently in place.

- When writing contracts for maintenance and construction, these policies shall be a part of the contract. *Time frame for completion:* January to December 2006.

#### *Purchasing and Stores*

- Administrative Services shall provide an oversight check for all departments for large volume purchasing to help maximize accessibility and will coordinate with Facilities Planning to help ensure that ADA-compliant items are purchased whenever appropriate (see *Purchasing* under *General Policies*). *Time frame for completion:* This policy is currently in place.

#### *Facilities Planning*

- Administrative Services shall provide accessibility oversight on all City facilities and accessible features of buildings. *Time frame for completion:* This policy is currently in place.

### **2.3.2 City Attorney's Office**

#### **Description of Programs and Services**

The City Attorney's Office is responsible for the legal representation of the City.

#### **City Attorney's Office Action Steps**

Following is a list of policies and practices that are specific to the City Attorney's Office. These should be combined with the City's general policies to complete the department's policies to implement the ADA.

#### *Contractor Compliance*

- The City Attorney's Office will require that standard language appear in all new City contracts and grants that prohibits discrimination on the basis of disability in compliance with the Vocational Rehabilitation Act of 1973 and the Americans with Disabilities Act. *Time frame for completion:* January to December 2006.
- The City Attorney's Office will also require standard language to appear in all City contracts that the contractor shall comply with any applicable provisions of the Americans with Disabilities Act. *Time frame for completion:* January to December 2006.

#### *Claims Against the City*

- The City Attorney's Office will provide reasonable accommodations to allow persons with disabilities who have claims against the City to file those claims. *Time frame for completion:* This policy is currently in place.

### **2.3.3 City Manager's Office**

#### **Description of Programs and Services**

The City Manager's Office supports City Council; maintains official records; disseminates public information; manages franchise agreements; oversees the American Disability Act Compliance Program, Risk Management, and Economic Development functions; and administers the Capital Improvement Program.

#### **City Manager's Office Action Steps**

Following is a list of policies and practices that are specific to the Office of the City Manager. These should be combined with the City's general policies to complete the department's policies to implement the ADA. Dissemination of information and meetings will be performed in accordance with the City's general policies and practices described in this plan.

##### *Capital Improvement Program*

The Capital Improvement Program (CIP) funds much of the development and maintenance of City facilities and the public right-of-way. There is a five-year capital improvement program process—improvements are prioritized and the first year of improvements gets funded. Each succeeding year, remaining improvement projects are rolled back.

- The accessibility costs will be identified for all CIP projects and compliance with ADA will be one of the evaluation criteria used in allocating money for the Capital Improvement Program (see *Funding* under *General Policies* for time frame for completion).
- A percentage of the Capital Improvement Program funding will be allocated to ADA-related work each year (specific amount to be determined by City Council).

### **2.3.4 Community Development Department**

#### **Description of Programs and Services**

The Community Development Department is responsible for evaluating development plans and proposals, including building permit application processing, plan checking, and permit issuance. The department also receives and processes complaints regarding commercial and residential land use, building safety, and business location. There are three divisions within the department: the Engineering Division, the Building Division, and the Planning Division.

#### **Community Development Department Action Steps**

Following is a list of policies and practices that are specific to the Community Development department. These should be combined with the City's general policies to complete the department's policies to implement the ADA.

##### *Building Code Review*

- For private building projects, the Building and Code Compliance Division will assist in ADA plan review and enforce the Title 24 Building Code regulations. The designer/owner will be

responsible for ADA compliance. *Time frame for completion:* This policy is currently in place.

- For City building projects, the Building and Code Compliance Division will review the plans and enforce both the ADA Regulations and the Title 24 Building Code regulations. *Time frame for completion:* This policy is currently in place.

### *Engineering*

- The Engineering Division will review all private projects within the right-of-way projects for compliance to both Title 24 Access regulations and the ADA requirements. *Time frame for completion:* This policy is currently in place.

### *Renovation of City Facilities*

- As renovation occurs, the order of priority for making accessibility modifications will be as follows:
  1. The building entrance and path of travel to the renovated space.
  2. The renovated space.
  3. The restrooms along the path of travel and the restrooms that serve that renovated space.
  4. Other amenities that will allow access and use of renovation.*Time frame for completion:* This policy is currently in place.

### *Zoning*

- The City will develop a process for evaluating zoning variances for the renovations of existing facilities and registered historic structures to accommodate the accessibility requirements of the ADA. *Time frame for completion:* January to July 2008.
- The City will review current zoning policies to evaluate the implications for people with disabilities. *Time frame for completion:* January to July 2008.

### *Visitability*

The City will review policies that address the design of single-family housing so that it can be lived in or visited by people with disabilities. Generally speaking, a house is visitable when it meets three basic requirements: at least one no-step entrance, doors and hallways wide enough to navigate through, and a bathroom on the first floor big enough to get into in a wheelchair, and close the door. *Time frame for completion:* January to July 2008

### **2.3.5 Department of Economic Development and Housing**

#### **Description of Programs and Services**

The Department of Economic Development and Housing administers seven broad program areas:

- The Santa Rosa Housing Trust, including Housing Production, Housing Preservation/Conversion, Special Needs Facilities, and Home Buyer Finance
- Homeless and Community Services, including Housing Services and Compliance, Federal Grant Administration, and Public Services
- Rental Housing Assistance, including Housing Choice Voucher and other rental assistance programs
- Redevelopment
- Economic Development
- Neighborhood Revitalization Program
- Mobile Home Rent Control

#### **Department of Economic Development and Housing Action Steps**

Following is a list of policies and practices that are specific to the Department of Economic Development and Housing. Overall program policies are given as well as specific policies for each program area. These should be combined with the City's general policies to complete the department's policies to implement the ADA.

##### *Requirements for Program Eligibility*

- The City has evaluated its program eligibility requirements to determine any potential for discriminating against individuals with disabilities. *Time frame for completion:* Completed.
- Applications will be evaluated on an individual basis to allow flexibility for individuals with disabilities. *Time frame for completion:* This policy is currently in place.

##### *Use of Federal, Local, and Redevelopment Funds*

- Construction of affordable housing with federal, state, local or redevelopment funds through the Housing Authority will meet all local, state, and federal requirements for percentages of units that are accessible. Percentages will be based upon the Uniform Federal Accessibility Standards and the Fair Housing Act for new construction. *Time frame for completion:* This policy is currently in place.
- Affordable housing production and preservation / conversion programs funded with federal funding sources are self-evaluated annually through submission of the Consolidated Annual Performance and Evaluation Report (CAPER). The CAPER reports on the City's performance in the following activities, among others:
  - Providing Housing Accessibility Modification grants;
  - Providing funds to further fair housing policies; and

- Updating an Analysis of Impediments related to fair housing, including impediments for individuals with disabilities.

*Time frame for completion:* This policy is currently in place.

#### *Deferred Payment Plans*

- The policy of allowing deferred payments on loans for seniors also applies to individuals with disabilities who qualify for housing programs. *Time frame for completion:* This policy is currently in place.

#### *Home Maintenance and Improvement Programs*

- The department will allow flexibility in making various maintenance and improvement programs available to people with disabilities. Modifications to increase accessibility will be included in the list of qualifying modifications or improvements. This will include programs such as the Mobile Home Repair Program, the Housing Rehabilitation and Conservation Program, the Housing Accessibility Modification Program, and the Neighborhood Revitalization Loan Program. *Time frame for completion:* This policy is currently in place.

#### *New Residential Development Programs*

- An accessibility component will be included in current and future programs that assist in funding new residential development, in accordance with federal, state, and local policies. *Time frame for completion:* This policy is currently in place.

#### *Homeless Assistance Program*

- The City will include disability compliance in contracts for operations of homeless shelters that receive City funding. *Time frame for completion:* January to December 2006.

### **2.3.6 Fire Department**

#### **Description of Programs and Services**

There are eight fire stations and one fire training facility. The Headquarters Fire Station houses the administrative offices and maintains public access. The outlying stations serve only to house emergency personnel. The Fire Training Center has three classrooms and a large outdoor training area. Programs administered by the Fire Department include:

- Management/supervision/administration
- Fire Prevention with six inspectors
- Emergency medical and fire suppression – 100 people
- Ongoing training
- Hazardous materials

## **Fire Department Action Steps**

Following is a list of policies and practices that are specific to the Fire Department. These should be combined with the City's general policies to complete the department's policies to implement the ADA.

### *Emergency Communication*

- The City of Santa Rosa maintains a premise information file in the Dispatch Program. The Fire Department will coordinate information with the Police Department and people with disabilities may call the Fire Business Office at (707) 543-3500 to have their information placed in the file. *Time frame for completion:* This policy is currently in place.
- There will be American Sign Language interpreters available on call 24-hours a day.
- To facilitate communication in an emergency with people with hearing impairments, Fire Safety Office should carry the following equipment: paper and pencil and cards with emergency information in Spanish. *Time frame for completion:* This policy is currently in place.

### *Training*

- Paramedics will be encouraged to learn American Sign Language.
- Firefighters shall continue to be given training in disability awareness, sensitivity, and working with and assisting people with a variety of disabilities, including lifting, guiding, and communicating with these individuals. *Time frame for completion:* This policy is currently in place.

## **2.3.7 Human Resources Department**

### **Description of Programs and Services**

The Human Resources Department is responsible for employment-related programs including recruiting, examinations, and classifications, and organizational and staff development and training. Under Title I, the Human Resources Department has evaluated City employment practices as a separate process from the policy recommendations of the ADA Task Force.

- The City has an Equal Employment Opportunity Policy, which states that it is the policy of the City of Santa Rosa that employment practices shall be based on non-discrimination of the applicant's race, color, religious creed, national origin, ancestry, sex, age, physical or mental disability, marital status, medical condition, or sexual orientation.
- The City's Anti-Harassment Policy was adopted for the purpose of providing a harassment-free work environment for all City employees. Harassment of an employee by a supervisor, management employee, or co-worker, or harassment of a supervisor by an employee on the basis of race, religious creed, color, national origin, ancestry, physical handicap, medical condition, marital status, sex age, or sexual orientation is prohibited. In addition, the City has a policy that prohibits the harassment of or retaliation against an employee by a supervisor, a management employee, or coworker, or harassment of a supervisor by an employee on the

basis of AIDS or HIV condition or the perception of having AIDS or HIV condition.

- On every job announcement for a City position, the City includes the following statement:  
*If special accommodations are necessary at any stage of the examination process, please provide the Human Resources Department with advance notice, and every attempt will be made to consider your request.*
- The City's anti-harassment policies and job announcements can be found on the City's website, [www.ci.santa-rosa.ca.us](http://www.ci.santa-rosa.ca.us). The City's Equal Employment Opportunity Policy can be obtained from the Human Resources Department.

### **2.3.8 Police Department**

#### **Description of Programs and Services**

The department will strive to continually improve the quality of life and the feeling of safety among our citizens. The Police Department is committed to a creative process, which develops mutual respect and pride in ourselves and the Community. To this end, the department values:

- Providing quality service;
- Encouraging accessibility, open communication, and participation in decision making;
- Developing an environment of mutual trust, fairness, sensitivity, and dignity;
- Promoting confidence in individual capabilities and cooperation; and
- Adapting to changing circumstances.

The department is comprised of three divisions:

- Field Services, which includes patrol services and traffic enforcement.
- Special Services, which is responsible for investigating crimes against persons, property crimes, narcotics enforcement, and gang crimes. This division also includes the School Resource Officer Program, Crime Prevention Program, Community Outreach Program, Victim Services Program, Training Program, and the Personnel Services Bureau.
- Technical Services, which is responsible for records, property and evidence, and the Communications Center, which is the link between the citizens of Santa Rosa and the Police and Fire units, including all urgent and emergency phone lines and 911.

#### **Police Department Action Steps**

Following is a list of policies and practices that are specific to the Police Department. These should be combined with the City's general policies to complete the department's policies to implement the ADA.

##### *Auxiliary Aids and Services*

- Text telephone (TDD/TTY) software is available at workstations of the Communication Center of the police station and staff members are regularly trained in using the hardware, software, deciphering tapes, and talking with and questioning callers.
- The option of using the services of "California Relay" instead of typing directly with a dispatcher is available.
- A premise information file will be kept to allow individuals with disabilities to inform police

of their special needs in case of emergency. Information on this program will be on the ADA website. *Time frame for completion:* January to March 2006.

- There will be American Sign Language (ASL) interpreters available on call 24-hours a day. *Time frame for completion:* This policy is currently in place.
- Effective communication techniques and devices shall be provided as needed for the interview of crime victims and for the interrogation of suspects with hearing disabilities. This will include qualified ASL interpreters and assistive listening devices. *Time frame for completion:* This policy is currently in place.

### *Training*

- Police will be given training in disability awareness and working with and arresting people with a variety of disabilities, including lifting, guiding, and communicating with these individuals. This includes working with individuals whose disability may not be immediately apparent, i.e., acquired brain injuries, symptoms that result in assaultive behavior, or affectations that simulate intoxication. *Time frame for completion:* January to December 2006.

### *Transporting Individuals with Disabilities*

- Any person who has been arrested and has a disability that precludes them from being transported in a safe manner in a patrol unit will be transported to the appropriate facility by ambulance. A contract between the American Medical Response and the Santa Rosa Police Department has been established for this purpose.
- For those individuals and for individuals with disabilities who have been injured and must be transported by ambulance, care will be taken, whenever possible, to transport equipment and service animals used by persons with disabilities for access and/or communication, taking into consideration the safety of the suspect, citizens in general, and the police officers. When transport with the disabled individual is not possible, transport of the equipment and/or service animal to the individual's destination will be made, if possible. If this is not possible, emergency personnel will contact an appropriate resource to secure and/or care for the equipment and/or service animal.

## **2.3.9 Public Works Department**

### **Description of Programs and Services**

The Public Works Department carries out work within the public right-of-way. Municipal Services Center (MSC) – South is headquarters, and field operations are housed in Municipal Services Center (MSC) – North.

The department is comprised of three divisions:

- Traffic Engineering, including day-to-day operations of the street system and assisting with the City's regional and local transportation planning.
- Engineering, including design and implementation of the Capital Improvement Program (CIP), public information program, private development and subdivision inspection, materials lab, design standards, and storm water management.

- Field Services, including maintenance of the City's fleet, streets, traffic signals, and streetlights.

## **Public Works Department Action Steps**

Following is a list of policies and practices that are specific to the Public Works Department. These should be combined with the City's general policies to complete the department's policies to implement the ADA.

### *Curb Ramps*

- The department will maintain a priority list for the construction of curb ramps based upon many criteria including, but not limited to: proximity to City or others public programs, buildings or projects; technical feasibility (i.e., right-of-way or underground conflicts); pedestrian traffic volumes; use by people with disabilities; the availability of an alternate route; and input from the ADA Community Advisory Committee. *Time frame for completion:* This policy is currently in place.
- All curb ramps will be designed and constructed to comply with state and/or federal accessibility standards (whichever provides the higher access standard) in place at the time of construction. *Time frame for completion:* This policy is currently in place.

### *Sidewalks/Pathways*

- The department will develop and maintain a priority list for the repair, reconstruction, and construction of sidewalks / pathways based upon many criteria including, but not limited to: proximity to City or other public programs, buildings, or projects; technical feasibility (i.e., right-of-way or underground conflicts); pedestrian traffic volumes; use by people with disabilities; the availability of an alternate route; and input from the ADA Community Advisory Committee. *Time frame for completion:* January to December 2006.
- All sidewalks /pathways will be designed and constructed to comply with state and/or federal accessibility standards in place at the time of construction. *Time frame for completion:* This policy is currently in place.
- The department will establish barricade guidelines standards for pedestrian detours. *Time frame for completion:* This policy is currently in place.

### *Encroachment Permits*

- All approved Encroachment Permits will require the applicant to comply with applicable ADA guidelines. Applicants will get a packet of guidelines to follow. *Time frame for completion:* This policy is currently in place.

### *Other Public Improvements*

- The department will use the applicable state and/or federal accessibility standards for design and construction of all other public improvements, including those projects designed and constructed solely for the purpose of improving accessibility. *Time frame for completion:* This policy is currently in place.

## **2.3.10 Recreation and Parks Department**

### **Description of Programs and Services**

The Recreation and Parks Department is responsible for park maintenance, recreation programs; park planning and development; street trees; and the Luther Burbank Home and Gardens.

The Recreation and Parks Department consists of six divisions:

- Administration
- Recreation Programs
- Park and Street Tree Maintenance
- Park Planning and Development
- Luther Burbank Home and Gardens
- Golf Course

### **Recreation and Parks Department Action Steps**

It is the intent of the Recreation and Parks Department to fully comply with the Americans with Disabilities Act of 1990. Every reasonable effort will continue to be made in order to accommodate participants with special needs in any facility, class, or activity.

Following is a list of policies and practices that are specific to the Recreation and Parks Department. These should be combined with the City's general policies to complete the department's policies to implement the ADA.

#### *Recreation Programs*

The Recreation and Parks Department offers a wide variety of recreation programs that include classes, special events, senior programs, sports leagues, trips, aquatics, camps, playground programs, neighborhood programs, and after-school programs. The department makes every effort to see that reasonable accommodations are made to insure persons with disabilities can participate in our recreation programs.

- *Publicity and Promotion:* All publicity and promotional materials the department distributes shall include a statement welcoming persons with all abilities to participate and describing how to obtain information related to access for people with disabilities. These promotional materials and publicity include: *Adventure Guide*, flyers, posters, brochures, radio and TV ads, and the Internet. *Time frame for completion:* This policy is currently in place.

- *Staff Training:* All employees shall be trained in ADA policies. Appropriate staff will receive higher levels of training on how to make programs accessible to persons with disabilities, including training in the use of specialized equipment, such as wheelchair lifts, pool lifts, and assistive listening devices. Lead staff will be trained in how to make reasonable accommodations in their programs so that persons with disabilities can participate. *Time frame for completion:* This policy is currently in place.
- *Facilities:* Every effort shall be made to hold recreation programs in facilities that meet ADA standards. *Time frame for completion:* This policy is currently in place.
- *Equipment:* Specialized equipment such as wheelchair lifts, TDD/TTY phones, assistive listening devices, and pool lifts are available to ensure that people with disabilities can participate in our recreation programs. Additional equipment shall be purchased or rented when reasonable and necessary to allow access. *Time frame for completion:* This policy is currently in place.
- *Contracted Classes and Events:* Information related to the ADA and the department policy shall be included in the orientation package for all contract instructors teaching classes for the department. Contract instructors are required to make reasonable accommodations to ensure individuals with disabilities can participate in our programs. Organizations sponsoring events in the department's facilities will be made aware of the City's ADA policy and required to provide adequate parking and accessible restrooms (e.g., additional reserved parking close to the event, accessible portable restrooms) for events requiring more than existing parking and restroom capacity. *Time frame for completion:* This policy is currently in place.
- *Requests for Accommodations:* All promotional materials and registration forms shall include information on how to make requests for accommodations. Once a request is received, it shall be forwarded to the appropriate program staff to determine how best to make the accommodation. Examples of accommodations may include but are not limited to:
  - Hiring a sign language interpreter for a class, event, or activity.
  - Moving a program to a facility that is accessible.
  - Allowing a person with a disability to bring a family member, friend, or assistant to a program at no additional cost.
  - Assigning additional staff or volunteers to assist a person with a disability to participate.
  - Purchasing specialized equipment as reasonably required to allow a person with a disability to participate.
  - Providing accessible transportation to all programs and events.
  - Accommodating special dietary requests.
  - Planning and advertising the presence of sign language interpreters at events and performances.
  - Providing staff and volunteers with additional training where needed to make reasonable accommodations.

*Time frame for completion:* This policy is currently in place.

### *Park and Recreation Facility Maintenance*

- Where available, priority will be given to choosing unscented cleaning products and those that are not toxic to individuals with multiple chemical sensitivities. *Time frame for completion:* This policy is currently in place.
- When non-housekeeping chemical treatments or painting occurs in park buildings used by the public, a notice will be placed on the building detailing the treatment. This notice will be posted before and after the treatment in order to alert individuals with chemical sensitivities of the possible presence of chemical residues. *Time frame for completion:* This policy is currently in place.
- Notification will be provided that the building maintenance schedule is available upon request.
- When a building is toxic for individuals with chemical sensitivities, reasonable accommodation will be made.
- Recreation and Parks Department Pest Management Policy will be followed when spraying pesticide in parks to notify the public at large and those with chemical allergies and sensitivities. *Time frame for completion:* This policy is currently in place.

### *Park Planning and Development*

- *Park and Recreation Facility Design:* Principles of accessibility will continue to be incorporated into the design and rehabilitation of parks and recreation facilities. *Time frame for completion:* This policy is currently in place.

## **2.3.11 Transit and Parking Department**

### **Description of Programs and Services**

The City maintains a parking district in the area bounded by College Avenue, Highway 101, Sonoma Avenue, and E Street. In this area, the department maintains five garages and nine surface parking lots with approximately 4,000 off-street spaces and 2,000 on-street spaces. Parking lots and garages are financed through user fees (including revenue from the sale of parking permits, garage hourly rate, and parking meters), and property owner assessments. Parking garages and lots have been managed since the 1950s, although some facilities are of newer construction.

The Transit and Parking Department is comprised of the following divisions:

- Parking Division
- Transit Division

The Transit and Parking Department prepares bi-annual updates of a Short Range Transit Plan, which includes fixed route transit (CityBus) and paratransit services.

### **Parking Division Action Steps**

Following is a list of policies and practices that are specific to the Parking Division. These should be combined with the City's general policies to complete the department's policies to

implement the ADA.

#### *Accessible Parking Spaces*

- Each public parking facility (including surface lots and parking structures) will provide accessible parking in compliance with the ADA Accessibility Guidelines (ADAAG) and the California Building Code (1129B). *Time frame for completion:* This policy is currently in place.
- When requested by a governmental entity without off-street parking, a curbside designated space will be provided adjacent to a government building. This space will not be in front of private property. The cost to install the space will be the responsibility of the requesting agency. *Time frame for completion:* This policy is currently in place.

#### *Parking Permit Application*

- Persons with disabilities will be allowed to mail-in applications for parking permits as a reasonable accommodation.

#### *Parking Citation*

- If a blue curb or time violation citation is issued to a vehicle with a DMV-issued disabled plate or placard, the driver or registered owner may have the citation dismissed by following the directions to contest a citation, printed on the citation form, and submitting a copy of the current placard identification form to the Transit and Parking Department. *Time frame for completion:* This policy is currently in place.

### **2.3.12 Utilities Department**

#### **Description of Programs and Services**

The Utilities Department is responsible for providing a safe and economic water supply for municipal, industrial, and fire suppression use. It provides a collection and treatment system for the City's wastewater and operates the Subregional Wastewater Treatment, Disposal, and Industrial Waste Pretreatment Systems.

The Utilities Department is comprised of the following divisions:

- **General Administration**  
This includes general management and the administration of the Utilities Department. Major responsibilities include management and administration, personnel, finance administration, training, employee development, labor relations, organizational improvement, policy development, budget analysis and control, long-range planning, and public relations. These functions occur at the Municipal Services Center – South.
- **Utilities Engineering**  
This includes planning, designing, and construction of water and wastewater system improvements. It also includes reviewing, controlling, and inspecting public utility improvements proposed by private developers, as well as the development and implementation of the Utilities CIP. This program also includes customer service and

determining project-specific utilities demand fees. These functions occur at the Municipal Services Center – South and at various locations throughout the City.

- **Water and Local Wastewater**

This includes water conservation, new water meter installation, water meter maintenance, portable meters, and hydrant meters. It also includes water service repair and replacement; water main repair; pump station, reservoir, and well maintenance; leak detection; fire hydrant maintenance; and overall administration of the water utility, as well as water quality sampling, testing, and backflow prevention. Local Wastewater includes operation of the West College and Oakmont treatment plants and treatment plant maintenance. It also includes local Santa Rosa collection system repair, and inflow and infiltration flow monitoring to detect and preclude the inflow of rain and stormwater into the sewer system so that the treatment plant does not treat this excess rainwater. This program also includes wastewater lift station maintenance. These functions occur at the Municipal Service Centers – North and South, Station #4, and at various locations throughout the City of Santa Rosa.

- **Subregional Wastewater Treatment and Disposal**

This includes the operation of the Laguna Wastewater Treatment Facility, which includes the Laboratory facilities and personnel. It also includes the Subregional Reclamation System, which is responsible for wastewater disposal system operations and maintenance. It includes conducting industrial discharges into the Subregional System. The maintenance section is responsible for maintenance and upkeep of the local and subregional treatment plants, the reclamation system, and elements of the local water and wastewater pumping stations. These functions occur at the Laguna Treatment Plant, Brown Reclamation Facility, and at various locations throughout the Subregional storage and reclamation system.

## **Utilities Department Action Steps**

Following is a list of policies and practices that are specific to the Utilities Department. These should be combined with the City's general policies to complete the department's policies to implement the ADA.

### *Door-to-Door Contact with Citizens*

- Reasonable accommodation will be available to permit field staff to interact with people with disabilities.
- Training will be available to field staff on communications and customer service to individuals with disabilities.
- In situations in which staff cannot adequately communicate with an individual homeowner, reasonable accommodations will be made.

*Time frame for completion:* These policies are currently in place.

## **3.0 Transition Plan Update for City Facilities**

### **3.1 Introduction**

The Transition Plan Update for City Facilities combines the findings of the policy assessments, program evaluations, and facility surveys conducted by the City in 1993 and updated in 2005/2006.

The following information is included in the Transition Plan Update for the removal of architectural barriers to program access:

- Identification of the architectural barriers to program access: Refer to *City of Santa Rosa Access Survey – Facility Reports*
- Identification of the specific barrier removal actions and architectural modifications: Refer to *City of Santa Rosa Access Survey – Facility Reports*.
- Identification of a schedule for barrier removal: Refer to *Time Frames for Completion* in this section.
- Identification of responsibility for ensuring barrier removal: The responsibility for ensuring barrier removal resides with the ADA Coordinator for Santa Rosa.

#### **3.1.1 Overview—City of Santa Rosa’s Approach**

It is the intent of the City to have its ADA Coordinator work together with department heads and budget staff to determine funding sources for the City’s ongoing program of architectural barrier removal projects. Once funding is identified, the ADA Coordinator will coordinate the placement of the projects in the City’s Capital Improvement Plan.

#### **3.1.2 Evaluation/Survey Process**

The survey update process will be accomplished using teams of surveyors equipped with measuring devices, facility diagrams, and survey forms. The surveys identify physical barriers in City facilities based on ADAAG and Title 24 standards. Diagrammatic sketches of each site and building or floor plan are annotated during the survey process and will be included in the facility reports. The diagrams indicate the location of architectural barriers and are numbered to correspond to the *Access Survey Report*. These annotated diagrams will assist City staff in prioritizing barriers for removal. The diagrams provide a visual reference for evaluating the physical and programmatic barriers posed by each architectural barrier.

The elements and their related features addressed in the facility survey include:

**Building or Site Feature**

Parking Area  
Passenger Loading Zone  
Curb Ramp  
Walk  
Ramp  
Stairway  
Hazard  
Door or Gate  
Sign  
Drinking Fountain  
Telephone  
Building Level or Lift  
Elevator  
Turnstile  
Automated Teller Machine  
Transaction Counter

**Types of Spaces**

Corridor or Aisle  
Room  
Multiple User Restroom

Single User Restroom  
Toilet Room  
Bathing Facility  
Locker Room  
Library  
Kitchen/Kitchenette  
Eating Area/Vending Machines  
Auditorium  
Area of Rescue Assistance

**Recreation Features**

Games and Sports Area  
Grandstand/Bleachers  
Swimming Pool/Wading Pool/Spa  
Picnic Area  
Site Furnishings: Fixed Trash/Recycling  
Fixed Bench  
Utilities in Recreation Areas  
Play Equipment Area  
Fishing Piers and Platforms  
Boating Facilities  
Golf Course

### 3.1.3 Facility Reports

A facility report will be produced for each site and building, detailing each item found to be in noncompliance with ADAAG and Title 24 standards. The facility report for each site includes:

- *Access Survey Report:* **Each specific barrier** encountered during the survey process is listed in table format. Barriers are organized by architectural element and located by reference number on the facility diagram.
- *Conceptual Solution:* A feasible conceptual solution to resolving the barrier is provided in text format.
- *Cost Estimate:* A cost estimate is provided for the removal of each barrier.
- *Priority Level:* A priority is given for each barrier removal.
- *Reference Diagram:* A reference diagram locates the barriers at each facility.

## 3.2 Transition Plan Update

### 3.2.1 Barrier Removal Priorities—Citywide

Recognizing that the City has limited funds and cannot immediately make all facilities fully accessible, City staff will utilize the following criteria as the basis for prioritizing the removal of architectural barriers:

- *Quantity and frequency of public use.*
- *Uniqueness of the facility:* Can the programs offered in this facility be shifted to an alternative, accessible location?
- *Age or condition of the facility:* Age or condition should not be major criteria, but can be factors if the building is scheduled to be vacated or demolished.
- *Geographic distribution:* Distribution of services throughout the City.
- *Critical nature of the programs offered at the facility:* Police, medical care, etc.

### **3.2.2 Barrier Removal Priorities—Within a Facility**

The criteria listed below are used to assist in the determination of specific program-based barrier removal actions within a facility for this Transition Plan.

- *Priority One:* The highest priority is placed on those barrier removal items that provide accessibility at the main entrance of a facility or improve a path of travel to the portion of the facility where program activities take place (for example, parking, walks, ramps, stairs, doors, and corridors).
- *Priority Two:* A second level priority is placed on those barrier removal items that improve or enhance access to program use areas (for example, meeting rooms, public offices, and restrooms).
- *Priority Three:* A third level priority is placed on those barrier removal items that improve access to amenities serving program areas (for example, drinking fountains, telephones, site furnishings, and vending machines).
- *Priority Four:* A fourth level priority is given to areas or features not required to be modified for accessibility (for example, no public programs located in this area or duplicate features where accessibility is already provided).

Since not all of barriers must be removed in order to provide program access, those barriers that limit access to public programs, services, and activities are given first priority. These criteria will also be used for prioritizing the removal of architectural barriers in future projects.

### **3.2.3 New Construction and Renovations**

Although the City has an ongoing program of renovating its facilities to achieve compliance with the ADA, renovations to City facilities to achieve compliance with the ADA have not always complied fully with ADAAG technical requirements and State of California standards. The following action steps apply to all new construction and renovation projects in the City:

#### **Action steps:**

- Ensure that all buildings and facilities conform to the technical requirements of ADAAG, per Title II of the ADA, and State of California standards for City-funded public developments. New development and renovations must comply with these standards.

- Prior to construction, schedule a review with the City's ADA Coordinator of all City plans and specifications for the construction of facilities. No project should proceed to construction without a completed and clean document review.
- Develop a procedure to ensure that the ADA Coordinator is informed of all plans prior to construction to ensure compliance with accessibility requirements.

### **3.2.4 Time Frame for Completion**

It is the intent of the City to address barriers to accessibility within a time frame of ten years depending on immediate necessity, degree of complexity, and overall cost. The City of Santa Rosa reserves the right to modify barrier removal priorities in order to allow flexibility in accommodating community requests, petitions for reasonable modifications from persons with disabilities, and changes in City programs.

## **4.0 City of Santa Rosa's Complaint Procedure for Discrimination Based on Disability**

### **4.1 ADA Complaint Procedure**

The City of Santa Rosa is dedicated to ensuring that all City programs, services, benefits, activities, and facilities operated or funded by the City are fully accessible to, and useable by, people with disabilities.

The City Manager's Office oversees the implementation and local enforcement of the City's obligations under the Americans with Disabilities Act (ADA) and other federal and state disability civil rights laws and accessibility laws.

#### **A. Service Requests and Informal Complaint Process**

You may contact the ADA Coordinator by phone at 707-543-3024 or [ada@srcity.org](mailto:ada@srcity.org). Requests or complaints relating to sidewalk repairs can be made directly to John Best at 707-543-3881 or [jbest@srcity.org](mailto:jbest@srcity.org).

You will be contacted within three (3) business days of receipt of your message if the person is not available at the time that you call or if you send an email or letter.

If you feel that your request or complaint has not been adequately responded to by the City, you may file a formal complaint as set forth below.

#### **B. Formal Complaint Process**

Formal complaints regarding accessibility issues should be addressed in writing, if possible, to the ADA Coordinator, City Manager's Office at P.O. Box 1678, Santa Rosa, California, 95402. Reasonable accommodations will be made, if required, to assist in the filing of a complaint.

Complaints should be filed within 180 days from the date the complainant becomes aware of the problem.

Complaints should include the following information, if available:

- a. Name, address, and telephone number or email address of the complainant or complainant's representative. If an address or telephone number is unavailable, then some other means of contacting the complainant should be provided.
- b. A brief description of the alleged violation, the location of the alleged violation, dates of violation, and names and contact information of any contact persons or witnesses.
- c. Any supporting evidence such as photographs, diagrams, letters, policies, or other documents that indicate the nature of the alleged violations and any attempts that have been made to resolve the issues.
- d. Any suggested proposals to resolve the complaint.

The City Manager's Office will oversee investigation of the complaint, which will be completed within thirty (30) days of receipt of the complaint. Within five (5) business days of receipt of the complaint, a letter acknowledging receipt of the complaint will be sent to the complaining party.

Upon completion of the investigation, the ADA Coordinator, or his/her designee, will advise the complaining party of the result of its investigation. If it is determined that any of violations alleged in a complaint are unfounded, the City will include in the letter advising of the determination the factual and legal basis for that determination.

In the event that the investigation determines that there is a violation of state or federal disabled access laws and regulation, a final resolution will be reached with respect to such ADA Complaint Procedure within ninety (90) days from confirmation of the violation.

The complainant can appeal the decision to the City Manager in instances where he or she is dissatisfied with the resolution. The request for appeal should be made within ten (10) days of receipt of the City's response to the complaint to the City Manager.

The ADA Coordinator shall maintain the files and records of the City of Santa Rosa relating to the complaints filed for a period of five (5) years. Copies of complaints may be requested from the ADA Coordination in accordance with California Public Records Act. Names and addresses of the complainants will be redacted to protect the individuals' privacy rights if copies of complaints are produced.

The right of a person to a prompt and equitable resolution of the complaint filed hereunder shall not be impaired by the person's pursuit of other remedies such as the filing of an ADA complaint with the responsible state or federal department or agency. Use of this grievance procedure is not a prerequisite to the pursuit of other remedies.

There is a separate complaint procedure for ADA issues relating to employment issues. Contact Human Resources to obtain information on this procedure.

## **5.0 Sidewalks and Curb Ramps Transition Plan**

### **5.1 Overview—City of Santa Rosa’s Approach**

The City of Santa Rosa maintains approximately 535 miles of streets, many of which contain curbs, gutters, and sidewalks. In accordance with the Santa Rosa Municipal Code and the Streets and Highways Improvement Act of 1911, property owners are responsible for the maintenance of curbs, gutters, and sidewalks adjacent to their property.

The City of Santa Rosa has a number of programs devoted to making the City’s streets and sidewalks more accessible: the “Gaps in Development” development and infill program; the Citizen Request program; the annual installation, repair, and maintenance program; and street-related capital improvement projects.

The City of Santa Rosa improves accessibility through a number of projects and programs. Through the Capital Improvement Program (CIP), accessibility is incorporated into the design of projects for pedestrian safety, pedestrian paths, and traffic signals. There is an annual project for the construction of pedestrian ramps. Ramps are installed or upgraded on all projects where streets are reconstructed or overlaid. Gaps between existing sidewalks are paved with asphaltic concrete with funds from the “Gaps in Development” item included as part of the annual Operations and Maintenance budget.

New commercial and residential development projects are required to install sidewalks, curb ramps, and other accessible pedestrian improvements as required by law.

The Public Works Department receives and evaluates requests from a variety of sources for sidewalk repairs on an ongoing basis. If repairs are warranted, Public Works undertakes asphaltic concrete repairs. A computerized database is kept of locations that may warrant more extensive long-term repairs based on available funding. The Public Works Department coordinates accessibility improvements on its CIP projects, through the sidewalk program as described above, and also constructs ramps from a prioritized list.

The Utilities Department coordinates ramp improvements on their CIP projects. The Community Development Department coordinates improvements constructed through the development review process. The Recreation and Parks Department coordinates accessibility improvements in City parks.

### **5.2 Sidewalk Inventory Plan**

In fiscal year 2005-2006, \$153,000 was allocated to prepare for an inventory of City sidewalks. The purpose of the sidewalk inventory is to collect a baseline of existing pedestrian facilities within the City of Santa Rosa. In turn, this inventory will be used to improve the accessibility of the pedestrian facilities throughout the City.

#### *Inventory Priorities and Criteria*

All areas within the incorporated City of Santa Rosa will be included in the sidewalk inventory. Each roadway segment located within the City will be classified as Priority Level 1 (high

priority), Priority Level 2 (medium priority), or Priority Level 3 (low priority). These priorities will be used to determine the order in which data is collected. The inventory order within each priority level was determined with assistance from the ADA Community Advisory Committee. A summary of the priority levels and a description of each are listed below:

**Priority Level 1 (high priority)**

- Arterial streets as classified in the City of Santa Rosa General Plan.
- Connecting roadway segments serving state and local government buildings including but not limited to: City- and County-owned facilities; public schools including Santa Rosa Junior College; hospitals, health centers, and clinics (public/private); public housing and shelters; bus lines and transit stations; and parks.

**Priority Level 2 (medium priority)**

- Collector streets as classified in the City of Santa Rosa General Plan.
- Connecting roadway segments serving public accommodations including but not limited to: shopping malls, supermarkets, and strip retail centers; major employment sites; housing complexes, including large apartment complexes.

**Priority Level 3 (low priority)**

- Single-family residential areas.
- Industrial areas.
- Other areas not classified as Priority Level 1 or 2.

In 2000, all intersections in the City were surveyed to determine if pedestrian ramps were present. The locations were then scored and prioritized and formed the basis of the annually reviewed “top 100” list.

### **5.3 Priorities for Curb Ramp Repair, Replacement, and New Construction**

To promote both efficiency and accessibility, the City of Santa Rosa may choose to construct curb ramps at every point where a sidewalk intersects a curb; however, the City is not necessarily required to do so. Traffic safety considerations may make construction of ramps at some locations undesirable. Alternative routes to buildings that make use of existing curb cuts may be acceptable under the concept of program accessibility in the limited circumstances where individuals with disabilities need only travel a marginally longer route. In addition, the fundamental alteration and undue burden limitations may limit the number of curb ramps that the City may be required to provide.

As a component of the City’s ADA Self-Evaluation and Transition Plan Update, criteria were developed for evaluating and prioritizing curb ramp construction and alterations. The prioritization criteria for ramps are listed on the City’s ADA web page under “Contacts Information.” (For quick access to the ADA web page, look for ADA under “Find It Fast.”)

The categories that are used to rank curb ramp improvements are:

- Repair of hazardous conditions;
- Distance from a City-operated program or building;

- Distance from a City bus stop;
- Proximity to a facility with disabled clients;
- Heavy pedestrian traffic;
- Lack of feasible alternate routes;
- Distance from non-City owned public facilities;
- Whether or not the ramp is on the current list; and
- The cost-effectiveness of the ramp.

## 5.4 Transition Plan—Sidewalks and Curb Ramps

It is the goal of the City to continue its efforts to improve pedestrian accessibility. To achieve its goal, the City plans to utilize the following criteria to guide its sidewalk and curb ramp programs:

- *Provide access to state or local governmental facilities or offices.*  
Since the ADA requires that funding priority be given to “walkways serving local and state government offices and facilities,” these conditions have received the highest priority in the City’s self-evaluation process.
- *Provide access to places of public accommodation.*  
Locations that provide access to “public, commercial, medical, professional, educational, or recreational services” are high priorities for curb ramp sites.
- *Provide access to public transit.*  
A goal of the curb ramp program is to improve access to bus stops along heavily used bus routes.
- *Enhance safety at pedestrian crossings.*  
High priority is given to curb ramps that will allow for safe crossings at controlled or marked intersections.
- *Create connected systems of accessible pathways.*  
City staff will look for opportunities to complete a partially accessible intersection or pathway and to expand an existing pathway system.

### 5.4.1 General Policies and Practices

**Self-Evaluation Findings:** Although the City has already instituted a number of programs to increase pedestrian accessibility, it will expand these programs in order to meet its overall goals.

#### **Action steps:**

- Institute regular (annual) public forums to supplement the curb ramp Citizen Request Program as part of the City’s ongoing responsibilities to improve accessibility for pedestrians.
- Maintain a citywide curb ramp inventory to determine where ramps need to be repaired, upgraded, or newly constructed to meet standards.

- Survey and document the suitability of the adjacent marked crossings, pedestrian traffic signals, and sidewalks connecting these curb ramps. (See 5.2 Sidewalk Inventory)
- Formally assign a Public Works staff person to coordinate the curb ramp Citizen Request Program and curb ramp installations and oversee policies associated with this Transition Plan Update.
- Provide information on the City’s curb ramp program to local and regional transit providers upon request in order to help coordinate the delivery of accessible transit services.
- Reasonable accommodation will be available to permit field staff to interact with people with disabilities.

### **5.4.2 Standard Curb Ramp Construction Details**

Resolution No. 26051 officially revised curb ramp standards 232A and 232B to be consistent with ADA and Title 24. As federal and state standards are adopted and revised, the City will continue to update its standards to comply.

### **5.4.3 New Development and Infill**

#### *City Policies, Procedures, and Regulations*

The City is charged as a whole to implement the Americans with Disabilities Act of 1990, Title II Public Services. The City has addressed its responsibilities through the adoption of the General Plan, Design Guidelines, codes, and standards as follows

#### *City Standards*

- City Street Design and Construction Standards adopted by City Council include sidewalks in the street sections.
- Pedestrian ramp standards have been adopted for use at street crossings.

#### *General Plan*

Many sections of the general plan are designed to give the City of Santa Rosa “livability,” which is defined as qualities that affect everyday living to make the City work for its residents and to help neighborhoods be comfortable and enjoyable. The following portions of the general plan specifically address issues that make the City of Santa Rosa livable for all of its citizens and accessible for people with disabilities.

#### **Section 2.6**

- LUL-A-1: promotes use of alternative transportation modes and discourages travel by automobile.

#### **Section 3**

- Urban Designs Downtown: promotes sidewalk pedestrian use to encourage use of downtown amenities.
- Neighborhoods: promotes neighborhoods being connected by streets and pathways to local shops, services, schools, and recreation activities.
- UD-G-3: guideline to assure pedestrian and bicyclist needs receive as much design

attention as the automobile.

- UD-G-4: guideline to provide through connections for pedestrians and bicyclists in new developments.

### **Section 5, Transportation**

- Section 5-7 of the general plan includes the topic of Pedestrian Facilities and encourages well-connected streets and sidewalks to promote walking. The installation of sidewalks for pedestrian travel is a requirement of new developments in the City. Recent City efforts have included provisions for safe pedestrian crossings for school routes. Development of mixed-use neighborhood shopping centers also contributes to pedestrian travel to and within common destinations
- Section T-J has provisions for attractive and safe streets for pedestrians and bicyclists, including: an updated Bicycle and Pedestrian Master Plan; and attractive street lighting for pedestrian safety.
- Section T-K includes provisions for the development of a safe, convenient network of pedestrian sidewalks and pathways that link neighborhoods with schools, parks, shopping areas, and employment centers.

### ***Design Guidelines***

The City of Santa Rosa's design guidelines include the following:

#### **Neighborhood Design**

To encourage neighborhood design that supports pedestrians, bicyclists, and use of public transit as well as automobiles (public transit encourages sidewalk use).

#### **Core (Downtown)**

To encourage buildings with active and open façades that interest those walking by and create an active pedestrian-oriented streetscape.

### **Section 3 Beyond Core Area**

#### **3.1 Goals**

- 3.1.G: To encourage single-family developments that incorporate interconnected, short blocks that diffuse traffic and provide easy, direct routes for pedestrians, bicyclists, and drivers around the neighborhoods.
- 3.2.H: Pedestrian Circulation: Provide sidewalks from dwellings to common facilities.

### ***Zoning Code***

#### **Chapter 3: Site Planning and General Development Standards**

- Development is consistent with the General Plan and the ADA.

## *City Code*

### **Chapter 18-12**

**The City code sets minimum requirements on building permits with valuations of \$20,000 or more requiring** complete roadway, curb, gutter, sidewalk improvements, storm drains, street lights, and street trees to be present or to be improved to standards during the permitted building process.

#### **Chapter 18-12.070**

Additionally, the code allows for the City to ask for changes that require dedication and improvement of street right-of-way or other improvement whether or not designated on any General or Specific Plan or Street list of the City, where said condition would promote the public peace, health, and safety by alleviating increased traffic, impeded traffic circulation, or other deleterious results occasioned by the improvement of such property during improvements in connection with Zone Change, variance, or conditional use permit.

#### *Planning and Review Process*

Land Use Development Applications are accepted by the Planning Department, and Building Permit Applications are accepted by the Building Department.

Planning Department will route those applications accepted to the Community Development, Engineering, Police, Fire, Utilities, and Building Departments for review and comment. The various department staff then review the applications in relation to how they meet current City Codes and Standards and write conditions correcting where the project application fails to meet those codes or standards.

Those comments are then forwarded in the form of conditions of approval and submitted to the Project Planner assigned to review that application. A final report is generated and presented to an approving body as established by City Code to act on the application by either approving with the conditions provided or denying the application.

Building Permit applications are accepted for individual construction projects that are allowed or have already been approved by the City. The Building Permit application is routed to the Community Development, Engineering, and Planning Departments for review and comment. During this review period the application public improvements may be required by City Code to develop the project street frontage in accordance with the General Plan and City Street Standards in bringing the existing street section up to current standards as to sidewalks and pedestrian ramps.

A copy of the *Procedure for Accommodating Pedestrians in Work Zones for Construction and Maintenance* is available on the City's ADA website under ADA policies.

### **5.4.4 Citizen Request Program**

Citizens can request ramps or modifications over the phone or via e-mail, with current contacts listed on the ADA webpage. The request is then field-reviewed to determine if there is an

immediate need or whether it should be scored and placed on a prioritized list for annual consideration by the Curb Ramp Committee with input from the public. Gaps in sidewalks, if feasible, are connected with an asphaltic concrete path on a first-come, first-served basis until the budgeted funds are exhausted.

There is also an official *Request for Accommodation and Barrier Removal Form* on the ADA webpage on the City's website that can be filled out and sent to the ADA Coordinator.

Citizen requests and subsequent actions are logged into a database.

#### **5.4.5 Annual Installation, Repair, and Maintenance Program**

Improvements to the pedestrian rights-of-way are made through the CIP program (budgeted by City Council on an annual basis), the sidewalk program, the annual pedestrian ramp project, the annual "Gaps in Development" project, and the development review process.

#### **5.4.6 Street-Related Capital Improvement Projects**

When Capital Improvement Projects include street construction, improvements or overlays, it is the City's policy to install new pedestrian ramps where none exist within the project limits and review existing ramps for upgrade where necessary and feasible.

#### **5.4.7 Federally Aided Street Overlay Construction Projects**

FHWA policy is to install new pedestrian ramps where none exist and upgrade existing ramps that do not meet current standards on federally funded projects within the project limits.

#### **5.4.8 Time Frames for Completion**

It is the goal of the City to complete a citywide inventory of sidewalks within a period of three years from plan adoption. The City will continue to implement its Citizen Request Program and Annual Installation, Repair, and Maintenance Program. It is the intent of the City to address sidewalk and curb ramp issues associated with its list of Priority One architectural barrier removal projects within a time frame of ten years, depending on immediate necessity, degree of complexity, and overall cost.

## **6.0 Program Accessibility Resources and Toolkit**

### **Introduction**

In order to facilitate access to City programs by all citizens, the City will assemble a general program accessibility toolkit that is available to all its departments. Each department will add to this toolkit when necessary to address its special needs. This toolkit will include resources, information, and technological devices that will help staff members communicate with individuals with a variety of disabilities. The City, with the help of the ADA Coordinator, will periodically review the components of the toolkit, as new technologies are developed, in order to ensure that the best types of modifications are included. The following items are suggested components of the program accessibility resources and toolkit.

### **Alternative Format Communications**

Resources to produce standardized publications such as applications and registration forms in audiotape, large-print text, Braille, and accessible electronic media will be assembled.

### **American Sign Language Interpreters**

A pool of on-call American Sign Language interpreters will be developed. This list will be routinely updated to ensure the availability of interpreters. Some programs may need to have a pool of interpreters who are available on a twenty-four-hour basis to handle emergency procedures.

The required qualifications of these interpreters will be established. Many non-certified interpreters provided by local services may have excellent skills and be qualified to handle most circumstances. However, certain circumstances, such as the provision of emergency medical services, may require interpreters who are approved by the courts and can ensure a level of confidentiality.

### **Assistive Listening Systems and Devices**

Systems and devices to amplify sound for persons with hearing disabilities will be available for public meetings and conferences. Various technologies exist for these devices. Different types of devices are more suitable for different types of hearing disabilities. Devices should be chosen to accommodate the greatest number of individuals.

### **Closed Caption Machine**

To the extent practical, access to services for encoding closed captioning on films and videotapes used for training and other programs, will be provided.

### **Optical Readers**

Services that can translate printed information into an audio format will be available to departments.

## **Text Telephone (TTY)**

City departments will have access to a text telephone (TTY) or have access to a telephone transfer service as required by the law and offered by public telephone companies.

## **Transportation**

Departments who provide transportation for their programs will provide accessible transportation as needed/requested by program participants. The City will continue to maintain its accessible transportation fleet. The City will purchase or contract lift-equipped vans or buses to transport individuals who use wheelchairs for programs conducted by the City and its departments.

## **Enlarging Printed Materials**

A copy machine capable of enlarging printed materials will be available for each site where programs or transaction counter services are provided to the public.

## **Guide to Disabilities and Disability Etiquette**

A guide to disabilities and disability etiquette will be made available to City staff. The guide will ensure that staff members are familiar with a variety of types of disabilities and that they are sensitive to the abilities and needs of people with disabilities in order not to offend or demean them. The guide will be periodically updated to ensure that it includes current acceptable language for talking about disabilities.

## **Lending Library of Assistive Technology Equipment**

The City will establish a “Resources Toolkit” of adaptive aids and human resources that will be available for use by departments and/or programs without the means to assemble their own. It is recommended that the City explore local sources of assistive technology.

## **Internet Resources**

The City will utilize the many disability-related resources available through the Internet. For example, the National Institute on Disability and Rehabilitation Research of the US Department of Education maintains [www.abledata.com](http://www.abledata.com), which provides up-to-date links to assistive technology and disability-related resources.

**Appendix A**  
**Accessibility Definitions**

Following is a summary of many definitions found in the ADA and ADAAG. Please refer to the Americans with Disabilities Act of 1990, the Title II Technical Assistance Manual, and the ADA Accessibility Guidelines for Buildings and Facilities (ADAAG) as amended through September 2002 for the full text of definitions and explanations.

### **Accessible Route**

An *accessible route* is a continuous unobstructed path that connects all accessible elements and spaces of a building or facility and that complies with Chapter 4 of ADAAG. Interior accessible routes may include corridors, floors, ramps, elevators, lifts, and clear floor space at fixtures. Exterior accessible routes may include parking access aisles, curb ramps, crosswalks at vehicular ways, walks, ramps, and lifts.

### **Auxiliary Aids and Services**

The term *auxiliary aids and services* includes:

- Qualified interpreters or other effective methods of making orally delivered materials available to individuals with hearing impairments;
- Qualified readers, taped texts, or other effective methods of making visually delivered materials available to individuals with visual impairments;
- Acquisition or modification of equipment or devices; and
- Other similar services and actions.

### **Complaint**

A *complaint* is a claimed violation of the ADA.

### **Curb Ramp**

A *curb ramp* is a short ramp cutting through a curb or built up to it.

### **Detectable Warning**

*Detectable warnings* are standardized surface features built in or applied to walking surfaces or other elements to warn individuals with visual impairments of hazards on a circulation path.

### **Disability**

The term *disability* means, with respect to an individual:

- A physical or mental impairment that substantially limits one or more of the major life activities of such individual;
- A record of such impairment; or
- Being regarded as having such impairment.

### **A. Qualified Individual with a Disability**

*A qualified individual with a disability* means an individual with a disability who, with or without reasonable modification to rules, policies, or practices; the removal of architectural, communication, or transportation barriers; or the provision of auxiliary aids and services, meets the essential eligibility requirements for the receipt of services or the participation in programs or activities provided by the City.

### **B. Regarded as Having a Disability**

An individual is disabled if she or he is treated or perceived as having an impairment that substantially limits major life activities, although no such impairment exists.

## **Discrimination on the Basis of Disability**

*Discrimination on the basis of disability* means to:

- Limit, segregate, or classify a citizen in a way that may adversely affect opportunities or status because of the person's disability;
- Limit, segregate, or classify a participant in a program or activity offered to the public in a way that may adversely affect opportunities or status because of the participant's disability;
- Participate in a contract that could subject a citizen with a disability to discrimination;
- Use any standards, criteria, or methods of administration that have the effect of discriminating on the basis of disability;
- Fail to make reasonable modifications to accommodate known physical or mental limitations of an otherwise qualified individual with a disability unless it can be shown that the modification would impose an undue burden on the City's operations;
- Use selection criteria that exclude otherwise qualified people with disabilities from participating in the programs or activities offered to the public; and
- Fail to use tests in a manner that ensures that the test results accurately reflect the qualified applicant's skills or aptitude to participate in a program or activity.

## **HIV**

The infectious agent known as Human Immune Virus, Human Immunodeficiency Virus, HTLV-III, LAC, or AIDS virus.

### **A. HIV Condition**

AIDS, ARC, or HIV Infection.

## **Physical or Mental Impairments**

*Physical or mental impairments* may include, but are not limited to: vision, speech, and hearing impairments; emotional disturbance and mental illness; seizure disorders; mental retardation; orthopedic and neuromotor disabilities; learning disabilities; diabetes; heart disease; nervous conditions; cancer; asthma; hepatitis B; HIV infection (HIV condition); and drug abuse if the

drug user has successfully completed or is participating in a rehabilitation program and no longer uses illegal drugs.

The following conditions are not physical or mental impairments: transvestitism; transexualism; current illegal drug use; homosexuality or bisexuality; compulsive gambling; kleptomania; pyromania; pedophilia; exhibitionism; voyeurism; pregnancy; height; weight; eye color; hair color; left-handedness; poverty; lack of education; a prison record; and poor judgment or quick temper that are not symptoms of a mental or physiological disorder.

### **Having a Record of Impairment**

An individual is disabled if he or she has a history of having an impairment that substantially limits the performance of a major life activity; or has been diagnosed, correctly or incorrectly, as having such impairment.

### **Marked Crossing**

A *marked crossing* is a crosswalk or other identified path intended for pedestrian use in crossing a vehicular way.

### **Program Accessibility**

A public entity's services, programs, or activities, when viewed in their entirety, must be readily accessible to and usable by individuals with disabilities. This standard, known as *program accessibility*, applies to all existing City facilities.

### **Reasonable Modification**

If individuals' disabilities prevent them from performing the essential functions of the program or activity, it is necessary to determine whether *reasonable modification* would enable these individuals to perform the essential functions of the program or activity.

*Reasonable modification* is any change in program or activity or in the way things are customarily done that enables an individual with a disability to enjoy equal program opportunities. Modifications may mean adjustments:

- To a registration or application process to enable an individual with a disability to be considered for the program or activity; and
- That enable individuals with disabilities to enjoy equally the benefits of the program or activity as other similarly situated individuals without disabilities enjoy.

Modification includes making existing facilities and equipment used by individuals readily accessible and usable by individuals with disabilities.

Modification applies to:

- All decisions and to the application or registration process;
- All services provided in connection with the program or activity; and
- Known disabilities only.

Modification is not required if:

- It changes the essential nature of a program or activity;
- It creates a hazardous situation; or
- It poses an undue burden.

## **Service Animal**

The ADA defines a service animal as any guide dog, signal dog, or other animal individually trained to provide assistance to an individual with a disability. If they meet this definition, animals are considered service animals under the ADA regardless of whether they have been licensed or certified by a state or local government. Service animals perform some of the functions and tasks that the individual with a disability cannot perform for him or herself. Some of the typical uses of service animals are:

- Guiding persons with visual impairments;
- Alerting persons with hearing impairments to sounds;
- Pulling wheelchairs or carrying and picking up things for persons with mobility impairments; or
- Assisting persons with mobility impairments to maintain their balance.

Although a number of states have programs to certify service animals, agencies or businesses may not insist on proof of state certification before permitting the service animal to accompany the person with a disability.

## **Substantial Limitation of Major Life Activities**

An individual is disabled if she or he has a physical or mental impairment that:

- Renders her or him unable to perform a major life activity, or
- Substantially limits the condition, manner, or duration under which she or he can perform a particular major life activity in comparison to other people.

*Major life activities* are functions such as caring for oneself, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working.

In determining whether a physical or mental impairment *substantially limits* the condition, manner, or duration under which an individual can perform a particular major life activity in comparison to other people, the following factors shall be considered:

- The nature and severity of the impairment;
- The duration or expected duration of the impairment; and
- The permanent or long-term impact (or expected impact) of or resulting from the impairment.

**Appendix B**  
**Program Accessibility Questionnaire for Program Providers**

## PROGRAM ACCESSIBILITY QUESTIONNAIRE

The purpose of this questionnaire is to gather data on how your department's programs\* are, or are not, accessible to people with disabilities. Questions are in the areas of:

- A. Public service,
- B. Outreach and information,
- C. Training and staffing,
- D. Programs and facilities, and
- E. Accessible/adaptive equipment.

Your participation in completing this questionnaire will assist your department in improving its ability to serve the needs of people with disabilities and their families. Please answer the following self-evaluation questionnaire.

### General description of the department's program

Department: \_\_\_\_\_

Division: \_\_\_\_\_

Name of person completing this questionnaire: \_\_\_\_\_

Telephone number: \_\_\_\_\_ Fax number: \_\_\_\_\_

List the Program your Department Provides:

1. \_\_\_\_\_

2. \_\_\_\_\_

3. \_\_\_\_\_

4. \_\_\_\_\_

Date of review: \_\_\_\_\_

Brief description of each program:

\* Throughout this questionnaire, the term “program” means “program, service, or activity” unless otherwise indicated.

## A PUBLIC SERVICE

### **Policies and practices that may limit the participation of individuals with disabilities in your programs**

A1. Consider your formal and informal program eligibility and admission criteria or licensing standards. Do they contain (check all that apply):

- physical or mental fitness or performance requirements?
- safety standards?
- testing requirements?
- educational requirements?
- income level requirements?
- credit rating requirements?
- requirements based on disability?
- requirements that prohibit participation because of disability?
- insurability requirements?

Please provide copies of the policies used for each checked category.

A2. If you have any such policies, do they or could they have the direct or indirect effect of excluding or limiting the participation of individuals with disabilities?

- No
- Yes

If yes, which of your exclusionary/limiting policies will be altered or eliminated to allow participation by individuals with disabilities?

When you alter or eliminate discriminatory policies, how will you communicate these policy changes to department staff and the public?

Which of the exclusionary/limiting policies will your department retain? What is your justification for their retention?

A3. Does your department have a process for determining whether a policy or practice modification would fundamentally alter the nature of the program you offer?

No

Yes

If yes, please briefly describe this process:

A4. Does your department have a process for responding to requests for modifications that would allow people with disabilities to participate in your programs?

No

Yes

If yes, please briefly describe the process you have established :

## **B. OUTREACH AND INFORMATION**

### **Notice Requirements**

- B1. How do you notify all persons (employees, applicants, participants, beneficiaries, volunteers, visitors, and other interested parties including those with visual and/or hearing disabilities) of their right to participate in your programs regardless of their disability?
- B2. How do you notify all persons about any special procedures used for individuals with disabilities?
- B3. How do you notify all persons that your meetings, hearings, and conferences will be held in accessible locations and that auxiliary aids will be provided, upon request, to participants with disabilities?
- B4. How do you notify all persons about how and with whom to file a disability discrimination complaint and what procedures are they told to follow? (This includes disability discrimination complaints because of volunteer services practices.)

### **Printed Information**

- B5. What documents do you publish?
- B6. Are all the program documents controlled centrally?
- No
- Yes

B7. How do you make documents and publications available to individuals with visual disabilities? Do you use (check all that apply)

- Audiotape?
- Large print?
- Braille?
- Computer disk?
- Some other media? List:

B8. Do you make the content of documents and publications available in simple, easy-to-understand language for individuals with learning disabilities?

- No
- Yes

B9. Do you portray individuals with disabilities in your documents and in publications?

- No
- Yes

If yes, provide a copy of the document or publication.

### **Televised and Audiovisual Public Information**

B10. Does your department prepare audiovisual or televised presentations for the public or make audiovisual presentations to the public?

- No
- Yes

If no, go on to the next section

B11. How do you make audiovisual or televised presentations prepared or presented by your department to the public accessible to individuals with disabilities?

B12. List the audiovisual presentation (film, videotape, or television).

Name of presentation: \_\_\_\_\_

Is the presentation captioned?

Yes

No

If no, list the steps your department has taken to ensure that persons with hearing disabilities can benefit from this presentation:

Name of presentation: \_\_\_\_\_

Is the presentation captioned?

Yes

No

If no, list the steps your department has taken to ensure that persons with hearing disabilities can benefit from this presentation:

Name of presentation: \_\_\_\_\_

Is the presentation captioned?

Yes

No

If no, list the steps your department has taken to ensure that persons with hearing disabilities can benefit from this presentation:

B13 Do you portray individuals with disabilities in audiovisual presentations?

No

Yes

If yes, provide a copy of the presentation.

## Website

B14. Does your department's website include any information about the programs you offer?

No

Yes

If yes, please describe briefly what information is provided:

B15. Does your department's website include information about the accessibility of facilities where programs or services are offered?

No

Yes

If yes, please describe briefly what information is provided:

B16. How does your department ensure that its website is usable by individuals with disabilities?

B17. Does your department provide documents on its website for downloading by the public?

No

Yes

If yes, do the documents meet federal accessibility standards for electronic and information technology?

## **Public Telephones and Communication Devices**

B18. How do you communicate telephonically with individuals with hearing disabilities?

If you use telecommunication devices for the deaf (TDDs), list location, telephone number, and organization or TDD directories in which the TDD number is listed.

If you use a TDD relay service, list the name of the company and type of service.

If you use a relay service, have you performed outreach to people with hearing and speech disabilities?

No

Yes

If yes, how?

B19 How do you train your staff in operating TDDs and in other means of communicating over the telephone with a person with a hearing disability?

## **C TRAINING AND STAFFING**

C1. What staff members have contact with the public and need to be aware of your department's obligations and policies that enable persons with disabilities to participate in department programs or activities?

C2. How have you informed/trained these staff members?

C3. Does anyone on your staff have experience working with people with disabilities?

No

Yes

If yes, describe:

C4. Does your department offer customer service training regarding the provision of appropriate modifications for people with disabilities?

No

Yes

If yes, describe

C5. Does your department offer staff training regarding the provision of appropriate modifications for people with disabilities?

No

Yes

If yes, describe

C6. Are there staff members in your department who provide emergency services to the public?

No

Yes

If yes, have they had training in American Sign Language (ASL) or other means of communicating with people who have hearing impairments in emergency situations?

Are there other staff members who would be able to offer better public service if they had training in American Sign Language (ASL) or other means of communicating with people who have hearing impairments?

## D PROGRAMS AND FACILITIES

### Program Eligibility Requirements and Admission

D1. Are there any limitations or ratios for the number of persons with disabilities who may participate in or be admitted to the program?

- No
- Yes
- Don't know

If yes, explain:

D2. Does your program use any criteria (e.g., good health, residency, letters of recommendation) or written and/or oral tests (including level of skill or achievement, or other factor being tested) in the admission process?

- No
- Yes
- Don't know

If yes, list and describe them:

D3. Are there any forms required for admission to the program (e.g., tests and/or the submission of other admissions criteria such as certificates)?

- No
- Yes

If yes, describe or attach the forms:

D4. Do the forms listed in D3 above contain a notice that your organization does not discriminate against people with disabilities?

- No
- Yes
- Don't know

D5. Is an interview required prior to an applicant's entrance into the program?

- No
- Yes
- Don't know

If yes, what steps are taken (including the provision of auxiliary aids, as required) to ensure non-discrimination in interviewing?

## Public Meetings

D6. Do you require that public meetings, hearings, and conferences be held in accessible locations?

- No
- Yes

D7. Are interpreters, readers, and/or adaptive equipment provided in an expeditious manner, when requested, for meetings, interview, conferences, and for public appearances by and with department officials, and public hearings?

- No
- Yes

D8. Do you ensure that individuals with hearing disabilities who do not read sign language can participate effectively in meetings, conferences, and hearings via assistive listening devices or other means?

No

Yes

### **Tours and Trips**

D9. Does your department provide tours of your facilities or organize trips for members of the public?

No

Yes

If no, go to the next section.

If yes, list and describe them:

D10. How do you provide accessible facility tours to people with

Visual disabilities?

Hearing disabilities?

Mobility disabilities?

Learning disabilities

D11. Do you require that trip destinations be accessible to people with disabilities?

- No
- Yes

## Transportation Services

D12. Do you provide transportation to volunteers, program participants, visitors, etc.?

- No
- Yes

If no, go on to the next section.

D13. What procedures does your department follow to make transportation accessible to persons who have:

Visual disabilities?

Hearing disabilities?

Mobility disabilities?

## Use of Consultants

D14. Do you use consultants to conduct programs on behalf of your department?

- No
- Yes

If no, go on to the next section.

D15. How do you ensure that consultants are aware of their obligations to facilitate participation of individuals with disabilities in programs or activities operated on behalf of your department?

D16. How do you monitor your consultants to ensure they fulfill this obligation?

### **Emergency Evacuation Procedures**

D17. What equipment and/or procedures do you use to notify individuals with disabilities of emergencies and evacuation procedures? List equipment and/or procedures specific to individuals with:

Visual disabilities:

Hearing disabilities:

Learning disabilities:

D18. Does the facility you operate your programs in have an evacuation plan? If so, please attach.



D21. How do you ensure that both private entities and your staff are aware of their obligations to facilitate participation of individuals with disabilities in these special events or private events held on public properties?

### **Maintenance of Accessible Programs and On-Going Accessibility Improvement**

D22. Have you had requests for improving accessibility to your department's programs or facilities?

- No
- Yes
- Don't know

If yes, describe:

D23. Would the implementation of any measure to improve accessibility for people with disabilities to your programs pose an undue financial or administrative burden?

- No
- Yes

If yes, list an alternative means that would not pose a financial or administrative burden.

D24. Does your department consult or work with any outside organizations that assist people with disabilities?

No

Yes

If yes, please provide a list of organizations:

## **E ACCESSIBLE/ADAPTIVE EQUIPMENT**

### **Automated Electronic Equipment**

E1. Do you allow the public to use electronic equipment—including copying machines, personal computers, microfilm readers, etc.—in your programs?

No

Yes

If no, go on to the next section.

E2. How do you ensure that electronic equipment is accessible to and usable by individuals with disabilities?

### **Auxiliary Aids**

E3. Are auxiliary aids (such as tools, access to using equipment, moving light sources, adjustable worktable levels, paper and pen, etc.) used to assist persons with disabilities?

No

Yes

If yes, describe:

**Appendix C**  
**ADA Community Advisory Committee**

## **ADA COMMUNITY ADVISORY COMMITTEE**

### **Becoming Independent**

1425 Corporate Center Parkway  
Santa Rosa, California 95407  
Paul Bell

### **Community Housing Development Corporation**

13412 Chalk Hill Road  
Healdsburg, California 95448  
Margo Merck

### **Community Resources for Independence**

980 Hopper Avenue  
Santa Rosa, California 95403  
Larry Henzerling  
Charlene Ho'ohuli  
Adam Brown

### **Council on Aging**

730 Bennett Valley Road  
Santa Rosa, California 95404  
Shirlee Zane

### **Earle Baum Center of the Blind**

4539 Occidental Road  
Santa Rosa, California 95401  
Jennifer Frazier  
Leslie Bailiff