

Final Report



CITY OF STOCKTON, CALIFORNIA

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ADA Self-Evaluation & Transition Plan



MOORE IACOFANO GOLTSMAN, INC.
800 Hearst Avenue
Berkeley, CA 94710
(510) 845-7549
www.migcom.com

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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 Stockton has undertaken a comprehensive 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.

This report describes the process developed to complete the evaluation of the City of Stockton's activities, provides policy and program recommendations, and presents a Transition Plan for the modification of facilities 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 is significant in that it establishes the City's commitment to the development and maintenance of policies, programs, and facilities that include all of its citizenry.

Federal Accessibility Requirements

The City of Stockton 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 (e.g., streets, sidewalks, and pedestrian rights-of-way).

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 grievance 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, sidewalks, curbs, and related facilities shall be accessible to and usable by persons with disabilities. These regulations, often referred to as Title 24, pertain to City of Stockton buildings, facilities, parks, sidewalks, and curb ramps that were constructed using state, county, or municipal funds or that are owned, leased, rented, contracted, or sublet by the City.

The City of Stockton's Approach

In an effort to comply with the ADA, the City of Stockton began a self-evaluation of its facilities in November 1993. At that time, the City Manager appointed the then Director of Personnel Services as the City's ADA Coordinator, and the Manager formed an ADA Compliance Task Force comprised of employees from various City departments. The Task Force discussed procedures for evaluating the City's facilities and began surveying those facilities most likely in need of ADA improvements. However, due to changes in personnel and fluctuating workloads, the evaluation process was not completed. Most file records from that effort were lost. Those records that were located indicated that a few facilities had been evaluated and some ADA improvements had been made on an ad hoc basis, with priority given to those facilities most in need of improvement and/or associated with projects completed as part of the City's overall Capital Improvement Program.

With a change in the City's management occurring in 2001, the goals of completing the self-evaluation, preparing the transition plan, and meeting the ADA requirements were renewed. In August 2002, the Stockton City Council approved an agreement with a consulting firm with the expertise and professional skills necessary to assist the City in completing its Self-Evaluation and Transition Plan.

The position of Program Manager III in the City Manager's Office was designated as the staff person to lead the consultant in the preparation of the plan. The City Manager formed an ADA Liaison Committee comprised of employees from various City departments to act as departmental contacts during plan preparation.

Upon completion of the plan and adoption by the City Council, it is the intent of the City to appoint an ADA Coordinator within twelve (12) months following plan approval. The Coordinator will be tasked with the implementation of action items described in the plan. In addition, the ADA Coordinator will be charged with the responsibility for enhancing the City's ADA programs Citywide; working with internal and external stakeholders; coordinating ADA activities; and providing leadership relative to the City's commitment to a strong and effective ADA program.

ADA Self-Evaluation and Transition Plan Development Process and Summary Findings

The process developed for the preparation of the ADA Self-Evaluation and Transition Plan included program and policy review and prioritization of architectural barriers for removal. In addition, consultants provided training to senior City staff regarding the ADA and their responsibilities under the law.

Policies, Programs, and Procedures

In 2002 the City began an 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 questionnaire administered to department staff provided information on the nature of the program, forms and methods used to advertise the 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. Two public meetings were held to solicit concerns and recommendations from the public regarding accessibility issues.

Information provided in the questionnaires, meetings with City staff, and input gathered at the 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 the following citywide programmatic accessibility barriers through the development of Administrative Directives, in the following areas:

- Customer service,
- Outreach and printed information
- City of Stockton website,
- Training and staffing,
- Public meetings,
- Facility information and signage,
- Public telephones and communication devices
- Purchasing accessible/adaptive equipment,
- Emergency evacuation procedures, and
- Maintaining accessible programs.

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.

Buildings, Facilities, and Parks

The City conducted a survey of architectural barriers in its buildings, facilities, and parks from January 2003 through August 2003. Only those areas open to the public were surveyed. The surveys 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 process was accomplished using teams of surveyors equipped with measuring devices, facility diagrams, and survey forms. The surveys identified physical barriers in City buildings, facilities, and parks based on ADAAG and Title 24 standards. Diagrammatic sketches of each site and building or floor plan were annotated during the survey process and are included in the facility reports. The diagrams indicate the location of architectural barriers and are numbered to correspond to the facility report *Barrier Identification Table*. 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:

Parking Area	Corridor or Aisle
Passenger Loading Zone	Building Level
Curb Ramp	Interior Stairway
Walk	Elevator
Exterior Ramp	Interior Ramp
Exterior Stairway	Multiple User Restroom
Site Furnishings	Single User Restroom
Grandstand or Bleacher	Bathing Facility
Swimming Pool	Room
Game and Sports Area	Eating or Dining Area
Play Equipment Area	Auditorium
Viewing Area	Library
Drinking Fountain	Dressing or Locker Room
Telephone	Turnstile
Hazard	Picnic Area
Sign	Golf Course
Door	

Facility Reports

A facility report has been 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:

- *Barrier Identification Table:* **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 building, facility, and park.

Removal of Architectural Barriers

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

- *Program uniqueness:* Some programs are unique to a building, facility, or park and cannot occur at another location;
- *Level of use by the public:* Buildings, facilities, and parks that receive a high level of public use should receive a high priority; and

- *Geographic distribution:* By selecting a range of buildings, facilities, and parks that are distributed throughout the City, the City can ensure maximum access for all residents.

Prioritization of Barrier Removal

The following table, *Architectural Barrier Removal Projects*, includes a list of buildings, facilities, and parks 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 that are distributed throughout the City thereby providing maximum access for all residents. The table includes those buildings, facilities, and parks that are considered by the City as being its highest priorities for addressing the removal of architectural barriers.

The criteria listed below were used to determine the priorities for addressing specific barriers in each building, facility, and park.

- *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 (e.g., parking, walks, ramps, stairs, doors, corridors, etc.).
- *Priority One:* A second level priority is placed on those barrier removal items that improve or enhance access to program use areas (e.g., pools, sports areas, public offices, restrooms, etc.).
- *Priority Three:* A third level priority is placed on those barrier removal items that improve access to amenities serving program areas (e.g., drinking fountains, telephones, site furnishings, vending machines) and/or areas or features not required to be modified for accessibility (no public programs located in this area, or duplicate features). (NOTE: The table set forth below does not include Priority Three items.)

It is the intent of the City to address those items listed as Priority One and Two within a time frame of one to seven years depending on immediate necessity, degree of complexity, and overall cost. In general, Priority Three items do not inhibit a person's ability to access or participate in a City program or event. Therefore, the City intends to address these items through routine maintenance, a building/facility remodel or improvement, or upon a request from a program manager or department head that a modification is necessary.

The City of Stockton reserves the right to change the 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.

CITY OF STOCKTON Architectural Barrier Removal Projects

	Priority One	Priority Two
<u>Municipal Buildings</u>		
City Hall	Elevator Obstructions / hazards Transaction counters Restroom improvements Council Chambers Curb ramps around building	Improve parking and building access Internal and external stairways Doors / hardware
Permit Center	Transaction counter Building level / lift Curb ramps in vicinity	Internal stairway Restroom improvements
Civic Memorial Auditorium	Parking area Transaction counters Curb ramps around building	Restroom improvements Auditorium seating Stage Doors / hardware Kitchen
<u>Libraries</u>		
Cesar Chavez	Access ramp into building Elevator Obstructions / hazards Curb ramps around building	Internal and external stairways Restroom improvements Transaction counters Doors / hardware
Margaret Troke Branch Library	Parking area Obstructions / hazards Curb ramps in vicinity	Restroom improvements Doors / hardware
Fair Oaks Branch Library	Obstructions / hazards Curb ramps in vicinity	Restroom improvements Doors / hardware
Maya Angelou Branch Library	Parking area Curb ramps in vicinity	Doors / hardware
<u>Community Centers</u>		
Oak Park Senior Center	Restroom improvements Curb ramps in vicinity	Doors / hardware Rooms Kitchen
McKinley Community Center	Parking area Restroom improvements Curb ramps in vicinity	External stairway Kitchen Rooms Doors / hardware
Stribley Community Center	Parking area Restroom improvements Curb ramps in vicinity	Kitchen Building level / lift Stairway Doors / hardware Rooms
Van Buskirk Community Center	Restroom improvements Curb ramps in vicinity	Kitchen Building level / lift Doors / hardware Rooms
<u>Community Parks</u>		
Oak / Louis / McKinley / Victory / Van Buskirk	Parking area Restroom improvements Curb ramps in vicinity	Swimming pools Picnic area Game and sports areas Doors / gates Walkways

	Priority One	Priority Two
Unique Facilities		
Children’s Museum	Parking area Restroom improvements Curb ramps in vicinity	Doors / hardware Rooms
Pixie Woods	Parking area Restroom improvements Transaction counter Curb ramps in vicinity	Walkways Picnic area Play equipment area Doors / gates
Philomathean Club	Parking area External stairway Access ramp Curb ramps in vicinity	Restroom improvements Building level / lift Kitchen Doors / hardware
Commander’s House (Rough and Ready)	Parking area Stairway	Restroom improvements Doors / hardware Kitchen

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.

Sidewalk and Curb Ramp Programs

The City of Stockton has a number of programs devoted to making the City’s streets and sidewalks more accessible.

- *New Development and Infill Program:* New development projects and those projects occurring as infill or redevelopment are required to install sidewalks and curb ramps.
- *Citizen Request Program:* Citizens are able to submit a request to have a new curb ramp installed or an existing curb ramp repaired at any location within the City.
- *Annual Installation, Repair, and Maintenance Program:* On an annual basis, the City’s Public Works Department repairs sidewalks and installs new curb ramps as part of routine maintenance.
- *Street-Related Capital Improvement Projects:* Sidewalks and/or curb ramps are installed and/or repaired in all street-related capital improvement projects (e.g., street widening or other street upgrades).
- *Federally Aided Street Overlay Construction Projects:* The City has begun to include the installation of curb ramps as part of federally aided street overlay projects.

As a component of this Self-Evaluation and Transition Plan, the City of Stockton conducted a physical survey and inventory of curb ramps in the areas of the City with the highest levels of pedestrian traffic, including the Central Business District of downtown and within a two-block perimeter of hospitals, between February and May 2003, to determine what recommendations and alterations might be necessary in order to meet current ADAAG technical requirements and State of California standards. The City also obtained information from the San Joaquin Regional Transit District, which identified locations along highly used bus stops where curb ramps should be located to enhance accessibility at bus stops.

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

- *Provide access to state or local 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 ramps 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.

As part of its on-going responsibilities to improve accessibility for pedestrians, the City intends to institute regular (annual or twice-yearly) public forums to supplement the Citizen Curb Ramp Request Program.

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.

On-going 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 Transition Plan

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 such 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 (i.e., word-of-mouth).
- Comparing programs to goals and objectives published by the federal government.
- Preparing and distributing a participants' questionnaire to measure increases in participation, and, where appropriate, socialization, health, and self-esteem.

Grievance Procedure

As part of the Self-Evaluation and Transition Plan process, the City of Stockton will create and adopt a uniform complaint procedure to resolve complaints related to discrimination under the ADA.

Program Accessibility Toolkit

In order to facilitate access to City programs by all citizens, the City will assemble a toolkit of information designed to assist its staff in communicating with and providing customer 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.