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Final Report



CITY OF STOCKTON, CALIFORNIA



ADA Self-Evaluation & Transition Plan



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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
Municipal Buildings		
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
Libraries		
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
Community Centers		
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
Community Parks		
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

Unique Facilities	Priority One	Priority Two
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.

1.0 ADA Self-Evaluation and Transition Plan 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 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. This report will assist the City of Stockton in identifying 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 section provides an overview of the requirements and process for developing the Self-Evaluation and Transition Plan. The next two sections address the findings and recommended actions related to providing accessible policies, procedures, and programs (Section 2) and those related to the City’s program for providing accessible buildings, facilities, and parks (Section 3). Section 4 reports the findings and recommended actions related to the City’s program for providing accessible sidewalks and curb ramps. Section 5 describes the requirements for the development of a grievance procedure for addressing complaints of disability discrimination. Section 6 describes suggested components of the City’s program accessibility 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. The City of Stockton 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 (for example, streets, sidewalks, and pedestrian rights of way). 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 Stockton 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 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.

This report, and certain documents incorporated by reference, establishes the ADA Self-Evaluation and Transition Plan for the City of Stockton.

In addition, 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. Title 24 regulations and standards were also incorporated in the evaluation of architectural barriers in City of Stockton

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 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 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 and to provide training to senior City staff regarding their legal responsibilities related to accessibility.

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.

1.3 ADA Self-Evaluation and Transition Plan Development Requirements

The Self-Evaluation 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, the City of Stockton:

- Identified all its programs, activities, and services; and
- Reviewed all the 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 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.

1.4 ADA Self-Evaluation and Transition Plan Development Process

The process developed and implemented to complete the City of Stockton's ADA Self-Evaluation and Transition Plan included meetings with department heads and Public Works staff; the administration of program accessibility questionnaires; a review of the City's published rules, regulations, and design standards for its sidewalk and curb ramp programs; and public workshops to obtain input from the public prior to completing the reports and to review the Transition Plan recommendations.

1.4.1 Introduction

Services and programs offered by the City of Stockton 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 were:

1. To develop policy recommendations for the City and each of its departments, divisions, and sections;
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 on-going one, and the City is encouraged to continue to review accessibility issues such as resolution of complaints and reasonable modifications to programs. The City should also periodically evaluate the success of improving access to programs by the practices and procedures developed during the Self-Evaluation process.

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

1.4.2 Program Accessibility Questionnaire

The Self-Evaluation of the City of Stockton's services, programs, and activities required and involved the participation of every department and division of the City. As a first step in this process, consultants provided training to senior City staff in 2002 regarding the ADA and their responsibilities under the law. The City then distributed the program accessibility questionnaire (see Appendix B) to each department/division for its staff to complete. Staff members were asked to complete a written program accessibility survey, which included an inventory of all services and programs provided to the public and the locations at which these were provided. The survey included a review of the following information:

- 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; and
- Communication, including audiovisual presentations and emergency evacuations.

1.4.3 Review of Published Rules and Regulations

The published policies and practices of the City of Stockton were analyzed to determine whether services offered are and/or language used is discriminatory to people with disabilities.

The City's practices, policies, and design standards for the new construction and alteration of curb ramps (including drawings and improvement standards) were also analyzed to determine whether they met current ADAAG technical requirements and State of California standards.

1.4.4 Staff Interviews

Staff members from the Public Works Department and the City Manager's Office convened to discuss the City's current policies and programs that address its sidewalk and curb ramp programs. This meeting focused on the City's awareness and understanding of ADAAG technical requirements and State of California standards, informal compliance policies, and standard operating procedures.

1.4.5 Public Participation Process

Two public meetings were included in the development of this Self-Evaluation and Transition Plan in order to obtain input from the community. Participants discussed access issues related to information, public rights-of-way, and facilities. Participants identified physical barriers to access such as lack of curb cuts, obstacles, and barriers in facilities. Recommendations from

participants in the public meetings are incorporated into this Self-Evaluation and Transition Plan report. Comments from the public workshop held May 20, 2004 are included in Appendix G.

1.5 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.

1.6 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.

2.0 Policies, Procedures, and Program Accessibility Findings and Recommended Actions

2.1 Introduction

Services and programs offered by the City of Stockton 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

This section details the review of current Citywide and unique policies, services, programs, and activities based on meetings with City staff, input gathered at the public meetings, and responses to the program accessibility questionnaire from the following departments, divisions, and units:

- **Administrative Services**
 - Accounting
 - Accounts Payable/Payroll Section
 - Revenue Services
- **City Attorney's Office**
 - Law Department
 - *Claims Unit*
 - *Vehicle Seizure*
- **City Auditor's Office**
- **City Clerk's Office**
- **City Manager's Office**
 - City of Stockton Website
 - Community Relations
 - Economic Development
- **Community Development Department**
 - Completion of Permitting Process
 - Inspections
 - Permits Tracking
 - Project and Permit Submittal
 - Public Meetings
 - Public Request
 - Research

- **Fire Department**
 - Administration Office
 - Emergency Communication Division
 - Fire Prevention Division
 - Fire Prevention/Fire Safety Demonstrations
 - Investigations and Juvenile Counseling
 - Division of Training
 - *SFD Auxiliary Firefighter Program*
 - *SFD Explorer Post 1888*
 - *Training Classrooms*
- **Housing and Redevelopment Department**
 - Central Parking District
 - Clerical Staff
 - Housing Division
 - Redevelopment Department
- **Human Resources Department**
- **Municipal Utilities Department**
 - Customer Service
 - Facility Tours
 - Publications
 - Public Meetings/Workshops
 - Public Participation
- **Parks and Recreation Department**
 - After School Program
 - Children's Museum
 - Community Centers
 - Facility Rental and Special Events Division
 - Oak Park Ice Arena
 - Pixie Woods
 - Recreation Division
 - Silver Lake High Sierra Camp

- **Police Department**

- Academy of Justice and Community Service

- Administrative Services

- Animal Control Section

- Bicycle Rodeo/Safety Class

- CARE Class

- Civilian Rider Program

- Evidence and Identification

- Fiscal/Planning

- Investigations Division

- *Megan's Law*

- Neighborhood Services Division

- *Administrative Hearings*

- *Code Enforcement Sweep Program*

- *Hotel/Motel Manager's Training Program*

- *V.O.I.C.E. Program*

- Police Communications

- Police/Curfew Center

- Police/Support Services

- *Property Room*

- Safe Kids Academy

- Special Investigations Section

- Special Services Section

- *Crime Prevention Fair*

- *National Night Out*

- *Neighborhood Watch*

- *Personal Safety Presentation*

- Stockton Police School Resource Officer

- Stockton Police Youth Activities

- Stockton Truancy Outreach Program

- Traffic Section

- *Counter Contacts*

- *DUI/Traffic Enforcement*

- *Traffic Safety Program*

Watch Commander's Office, Citizen Complaints

- **Public Works Department**
 - Capital Improvements Program Project
 - *Public Information/Outreach*
 - Operations and Maintenance Division
 - *Capital Projects*
 - Solid Waste and Recycling Division
- **Stockton-San Joaquin County Public Library**

Program summary reports for specific City departments, divisions, and units are included in Appendix C. Each of those specific reports includes a description of programs and services; a contact person; the location(s) of operations; practices that facilitate the participation of people with disabilities in programs and activities; practices that require modification; and recommended actions, which will also be included in each department's policy manual.

2.1.2 Recommended Actions

The City of Stockton proposes to address barriers to accessibility resulting from its policies, programs, and procedures in two ways.

Administrative Directives

It is the intent of the City to address citywide programmatic accessibility barriers through the development of Administrative Directives, to be issued by the City Manager to all City departments, 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.

Department-Specific Actions

The ADA Coordinator, or designee, will follow-up with each department to ensure that the City Manager's Administrative Directives are implemented. In those situations where a policy,

program, or procedure creates a barrier to accessibility that is unique to a department or a certain program, the ADA Coordinator, or designee, will coordinate with the department head or program manager to address the removal of the barrier in the most reasonable and accommodating manner.

The Administrative Directives will be made part of each department's ADA implementation strategy. They will be included in a policy manual for use by each department along with specific actions related to that department to guide the administration of programs.

2.1.3 Time Frames for Completion

It is the intent of the City of Stockton to prepare, distribute, and begin the implementation of administrative directives addressing barriers to accessibility within twelve (12) months following the appointment of an ADA Coordinator. It is the goal of the City to have a plan in place to address all of the citywide policies, programs, and procedures that act as barriers to accessibility within two years following the appointment of the ADA Coordinator. 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 Findings and Recommended Actions—Citywide Practices, Activities, and Programs

2.2.1 Customer Service

Self-Evaluation Findings: In-person communication with the public is one of the primary functions of any city department. The City as a whole and most departments do not have established procedures for determining reasonable modifications to achieve program accessibility. Most City departments have utilized some form of communication modification, such as paper and pencil or a reader. A TDD is not available at most department locations.

Recommended Actions:

1. Make appropriate modifications to regular practices to accommodate the needs of individuals with disabilities when providing customer service at City transaction counters.
2. Provide accessible facilities such as van parking, path of travel, entry door, and transaction counters at customer service locations.
3. Provide standard equipment at each site where programs are administered to facilitate basic communications access. Equipment may include paper and pencil, a copy machine to enlarge print, and access to a text telephone or TDD.
4. Identify and have available a relay service that can be used for telephone communications and/or use an alternative method of communication such as email.
5. Allow the use of service animals to access City programs and facilities. Since service animals are not always dogs, staff should be made aware of the definition of a service animal.
6. Assign a staff member to be a greeter at public meetings and events. Identify the staff member as a resource for persons with disabilities who might require special assistance.

7. Develop criteria for determining reasonable modifications to provide program accessibility, which may include acquisition or redesign of equipment, assignment of aides to persons with disabilities, and provision of services at alternative accessible sites. The following is a suggested approach.
 - Requests for reasonable modification in programs or services should be made to the department responsible for the program or service.
 - The department offering the program or service should meet with the individual with a disability to identify which aspects of the program limit participation and what modifications can be made.
 - The department offering the program or service should consult with the affected program or service staff to determine the reasonable modification. The department offering the program or service may also consult with the City's ADA Coordinator or other resources providing services or information regarding persons with disabilities as appropriate.
 - The department offering the program or service should document the modification(s) that was offered and the response of the person with the disability to the modification(s) offered. This documentation should be filed with the City ADA Coordinator's office.
 - If individuals with a disability are not satisfied with the results of this process, they should follow the complaint procedure outlined in Section 5.

2.2.2 Outreach and Printed Information

Notice Requirements

ADA regulations require the City to inform the public of the rights and protections provided by the ADA.

Self-Evaluation Findings: Public notification regarding events and registration often does not include nondiscrimination language nor does it always identify a contact person for those persons with disabilities who may need program modifications.

Recommended Actions:

1. Increase outreach to persons with disabilities. The City should endeavor to do more to inform the public of the possible modifications it is required to and can provide to make its services, programs, and activities accessible.
2. Include the following notice (or a similar notice) regarding the City's commitment to providing accessible services in all City publications that provide general information about or registration information for City services, programs, or activities. The notice should also be produced in poster-size form and placed in all City departments in a location that will maximize public exposure.

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

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

_____ 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. _____ may be reached at:

City of Stockton
425 El Dorado Street
Stockton, CA 95202
(209) ____ - ____ (Phone)
(209) ____ - ____ (TDD)
(209) ____ - ____ (FAX)
ada.coordinator@ci.stockton.ca.us (email)

3. List those City agencies, departments, and specialized services that offer TTY/TDD in printed City directories and include the following statement:

The City of Stockton government offers Text Telephone (TTY) or Telecommunications Device for the Deaf (TDD) services for persons with hearing impairments.

Printed Information

In order to meet the ADA's communication standards, City departments must be able to provide information in alternative formats such as using easy-to-understand language, Braille, large-print format, audiotape, or computer disk.

Self-Evaluation Findings: Many City departments and offices produce printed information that is available to the public.

While some City departments distribute information about obtaining printed information in alternate formats, other departments do not. Many departments routinely produce printed information in alternate formats upon request.

Most registration forms, permits, and waivers are only available in written form.

Recommended Actions:

1. Provide information to each department on how to produce printed information in alternative formats for people with various disabilities to ensure that requests are handled in a uniform and consistent manner.
2. Publicize the City's commitment to provide program information in alternative formats on an individual basis as requested, including large-print media and taped announcements available over the telephone.
3. Ensure the uniformity of charges for a publication for all formats of that publication.

4. Include the following notice on all materials printed by the City that are made available to the public:
This publication can be made available upon request in alternative formats, such as, Braille, large print, audiotape, or computer disk. Requests can be made by calling (209) ___-___ (Voice) or (209) ___-___ (TDD). Please allow 72 hours for your request to be processed.
5. Identify and have available a list of interpreters, readers, etc. to be used to accommodate requests for these services.
6. Handle all requests for other alternative formats or lengthy documents on an individual basis.
7. Provide program, facility, permits, and reservation information in a variety of formats upon request (for example, in large-print format for people with visual disabilities or in simple language for people with cognitive disabilities). Provide programmatic changes (e.g., staff assistance), upon request to assist in filling out forms or when alternative formats are unavailable or infeasible.
8. Provide an accessible permit, reservation, or registration system in a variety of formats. For example, provide Telephone Device for the Deaf (TDD) service for applications, reservations, and general queries.
9. Produce meeting agendas and other public information distributed at meetings in alternative formats when requested.

General Publicity and Advertising

Self-Evaluation Findings: Public notification regarding meetings, conferences, and other events does not include information regarding accessible locations and the availability of auxiliary aids. Increased outreach to persons with disabilities is needed to inform the public of the services and facilities already available and possible modifications the City is required to and can provide to make its services, programs, and activities accessible.

Recommended Actions:

1. Take the necessary steps to improve communication and outreach to increase the effective participation of community members with disabilities in all City programs and activities.
2. Publicize efforts to increase participation by people with disabilities, which might include activities such as distributing program brochures to members of the disability community.
3. Develop a statement regarding accessible locations and the availability of auxiliary aids upon request that is included on all public announcements, postings for City programs, and applications, including:
 - The notice of nondiscrimination;
 - Information regarding site accessibility, including the accessible bus route serving the program, facility, or event;
 - The department's text telephone (TDD/TTY) number and the phone number and email address of the person who can provide assistance in meeting special needs; and
 - A notice that information is available in alternative formats with 72 hours notice.

Televised and Audiovisual Public Information

All of the programming for Channel 97, a cable TV channel devoted to the Stockton City Government, is written, produced, and edited by City of Stockton employees. This means of communicating City issues to the public can be particularly effective in reaching persons with

disabilities who may be prevented from attending City Council meetings.

Another means for disseminating public information is through audiovisual presentations produced by City departments. Providing closed captioning for audiovisual presentations (including film, video, and television programs) is another.

Self-Evaluation Findings: The publicity for Channel 97 programs does not indicate that alternatives to audio presentations are available upon request. Channel 97 is currently seeking funding to provide closed captioning for its programs (such as City Council meetings).

Recommended Action:

1. Explore the feasibility of using closed captioning or other alternatives to audio presentations for Channel 97 programs and for audiovisual presentations produced by the City (including videos and films) in order to ensure that persons with hearing impairments can benefit from these presentations.

2.2.3 City of Stockton Website

Notice Requirements

As people turn to the Internet as their primary source of information regarding services, products, programs, and facilities, the City's website (www.stockton.gov or www.ci.stockton.ca.us) takes on increased importance as a communications tool.

Self-Evaluation Findings: Efforts are currently underway to make the website user-friendly for people with disabilities. Although several departments' web pages include information related to how their services or facilities are accessible to people with disabilities, most do not.

Recommended Actions:

1. Increase outreach to persons with disabilities by having the website include more information about the City's commitment to providing accessible services.
2. Include the City's *Policy on Non-Discrimination on the Basis of Disability* on the City's website.
3. List those City agencies, departments, and specialized services that offer TTY/TTD in the website telephone directory (the *Contact Us* web page), and include the following statement:
The City of Stockton government offers Text Telephone (TTY) or Telecommunications Device for the Deaf (TDD) services for persons with hearing impairments.
4. Provide information regarding programs, facilities, permits, and reservations on the City's website in an accessible format.
5. Include the City's statement regarding accessible locations and the availability of auxiliary aids upon request on the website.

Public Information

Providing public access to City publications on-line is an effective means of reaching people with disabilities. New accessibility standards for electronic and information technology covered by Section 508 of the Rehabilitation Act Amendments of 1998 have set forth the technical and functional performance criteria necessary for such technology to be accessible.

Self-Evaluation Findings: Some City publications are available through the website in PDF formats that are not fully accessible and some web pages may not include accessible features.

Recommended Actions:

1. Continually improve the accessibility of web pages through the use of web accessibility analysis to meet and/or exceed Section 508 of the Rehabilitation Act guidelines for accessibility of electronic information. Acquire the technological resources necessary to create accessible PDF files as described in ADAAG standards for electronic and information technology. Provide training in creating accessible PDF files to City staff members who prepare PDF files of City publications for posting on the City's website. Use the City's ADA Coordinator as the editor for all PDF files to be posted on the City's Website.
2. Use services that help web page authors provide an accessible website by identifying and repairing barriers to access for individuals with disabilities. One of the most commonly used services is *Bobby* (<http://bobby.watchfire.com>), but new products and services are constantly being introduced. Other disability-related Internet resources include: www.hisoftware.com, www.access-board.gov/links/communication.htm, www.watchfire.com, and www.w3.org.

2.2.4 Training and Staffing

Self-Evaluation Findings: In general, City staff members are unaware of the everyday accessibility problems encountered by persons with disabilities, and they have limited experience working with individuals with disabilities. Many staff members may not be aware of the different types of reasonable modifications that would make their services accessible. Few programs have made adaptations to their programs regarding accessibility.

One of the needs most frequently identified by City departments is the need for more and improved training. Different types of training are necessary depending on the type of work and the amount of public contact involved with a specific position. Although many staff member are able to or have been trained in how to communicate via telephone with individuals with hearing disabilities, citywide accessibility guidelines, procedures, and trainings have not yet been developed for areas such as:

- Standardized, appropriate language for outreach and written material;
- How to acquire or use assistive devices; and
- General evacuation procedures for buildings.

Recommended Actions:

1. Provide training to City staff members who have contact with the public with regard to providing modifications and using assistive devices to make their programs accessible. Ensure that customer service training that is provided to City employees includes training with respect to communicating with and providing modifications for people with a variety of disabilities. Include program-specific adaptations, assistive devices, and modifications in each department's accessibility policy manual.
2. Develop a comprehensive disability access training program. Educate all City staff in their responsibilities under the ADA. The City's ADA Coordinator should be responsible for ensuring that staff members receive training. Reference materials that address special modifications should be included in this training.

3. Develop standard guidelines for outreach and written materials. These guidelines should include standard language that appropriately describes the City's policies on inclusion and nondiscrimination, and staff members should receive training in using the guidelines effectively.
4. Provide all City staff members with on-going awareness and sensitivity training. Resources such as the City of Long Beach's website, *Disability Etiquette: Interacting with People with Disabilities* (www.ci.long-beach.ca.us/hr/employees/ada/etiquette.htm), may be helpful. Include people with disabilities as trainers.
5. Depending on operational needs, consider offering training to employees who wish to learn American Sign Language (ASL) and develop interpreting skills. This training should emphasize basic communication skills and should not be viewed as a substitute for employing qualified ASL interpreters when requested.
6. Widely disseminate information regarding the availability and location of City Telephone Communication Devices for the Deaf (TDD), and train staff members in the use of TDD equipment or other means of communicating over the telephone with a person with a hearing disability.
7. Train maintenance staff with respect to accessibility compliance and building codes to achieve accessibility.
8. Provide City staff members with training in general building evacuation procedures for assisting people with hearing, visual, mobility, and learning disabilities in an emergency.
9. Designate one high-level manager in each department 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.

2.2.5 Public Meetings

Many City departments are responsible for holding public meetings.

Self-Evaluation Findings: Generally, public meetings are held in locations that are accessible to persons with mobility impairments. However, most City departments indicated that they need training on how to respond to requests for other modifications. Assistive listening systems are not routinely available at City meetings.

Recommended Actions:

1. Schedule public meetings 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.
2. When a fully accessible site is not available, then make reasonable modification so that an individual with a disability can participate.
3. Make information available to City staff on the types of modification requests that may be made by persons with different types of disabilities. Provide information about auxiliary aids such as different types of assistive listening systems, sign language interpreters, readers, descriptive services, and other assistive technologies like "real-time captioning."
4. Display a notice on meeting agendas indicating the availability of accessibility modifications.
5. Provide agendas in alternative formats, when requested.
6. Provide flexibility in the time limit on speaking for individuals with communication

difficulties.

7. Provide assistive listening devices at public meetings, when requested.
8. Publicize the availability of American Sign Language (ASL) interpreters in all meeting announcements. Include the following notice in all meeting publicity:
Translators, American Sign Language interpreters, and assistive listening devices for individuals with hearing disabilities will be available upon request. Please make your request at least 72 hours prior to the meeting.

If you require other modification not listed above, please call [Staff Person] at (209) ____ - ____ (Voice) and (209) ____ - ____ (TDD). Your call at least 72 hours prior to the meeting would be appreciated.

9. Maintain a list of on-call American Sign Language interpreters who may be brought to meetings to assist individuals with hearing impairments.
10. Develop a checklist for creating accessible meetings and selecting accessible meeting spaces, and make the list available to all City departments and programs.
11. Prepare a list of already accessible meeting spaces to facilitate the scheduling of meetings and/or the relocation of meetings upon request.

2.2.6 Facility Information and Signage

Self-Evaluation Findings: Accessible directional, informational, and permanent room signs are not provided at many City buildings and sites. The floor plans for facilities displayed on the City's website do not include information about accessible paths of travel, accessible routes, or specific information about the accessibility of rooms where public services are provided. The City of Stockton *Parks Listing and Locations* web page and the Parks and Recreation Schedules both indicate whether a site has features that are considered to be accessible to people with disabilities. However, it would not be possible for a person with disabilities to determine which features in a particular park are accessible based on the information provided.

Recommended Actions:

1. Include on the City's website basic information about accessible routes and paths of travel and specific information about accessible elements along the path of travel (e.g., parking and restrooms) and particular rooms or features (e.g., picnic tables, ball courts, and play areas) that meet the accessibility guidelines and requirements.
2. When signs are replaced, use those that provide appropriate information regarding accessibility. Give priority to replacing **all required signs** with accessible signs.
3. Include the International Symbol of Accessibility (ISA) wherever required on directional and informational signs (and on the City's web pages) and consider its use whenever possible.
4. Provide, to the maximum extent possible, rules or policies that relate to safety or instruction at a particular site in an accessible format.

2.2.7 Public Telephones and Communication Devices

Self-Evaluation Findings: The City has a main telephone number for use with the City TDD (telephone communication devices for the deaf). Some departments or even divisions within departments have sufficient demand to install their own TTY or TDD.

Recommended Action:

1. Request that the phone company provide an amplification device, a shelf, and text telephone (TDD/TTY) or an outlet for a text telephone at each site where public phones are available.

2.2.8 Purchasing Accessible/Adaptive Equipment

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.

Self-Evaluation Findings: Many City departments are unaware of resources for purchasing equipment or supplies that would make their programs more accessible to people with disabilities.

Recommended Actions:

1. Collaborate with community organizations such as the Disability Resources Agency for Independent Living (DRAIL) to develop a resource list of assistive technology equipment and sources for acquiring them.
2. Establish a "Resources Toolkit" of adaptive aids and human resources that should be available for use by individuals participating in City programs. Include information about the availability of specific equipment and/or individuals who are available to provide special services (e.g., ASL translation) in public information materials such as brochures and the City's website.
3. Evaluate furniture and building materials purchases for compatibility with a wide range of disabilities and sensitivities.
4. Select items that are easily adjustable or can be modified to accommodate a variety of physical and ergonomic needs when purchasing items such as furniture, site furnishings, and office systems.
5. Include accessibility as a criterion for selecting items. Purchasing accessible equipment is a complex task, and the purchasing department is encouraged to consult appropriate experts when making large purchases.

2.2.9 Emergency Evacuation Procedures

All City departments require established emergency evacuation procedures to safely evacuate persons with disabilities who may need special assistance in an emergency.

Self-Evaluation Findings: While emergency evacuation plans exist for all City buildings, most City departments have not established emergency evacuation procedures to safely evacuate persons with disabilities.

Recommended Actions:

1. Develop guidelines for the evacuation of persons with disabilities in various types of emergency situations. Each department, division, or program should use these guidelines to create their own emergency evacuation plans. These plans should:
 - Address what to do when an alarm is triggered;

- Establish meeting places for assistance and evacuation chairs;
- Provide direction on what to do if assistance is not available; and
- Establish floor wardens.

Specific suggestions for evacuation plans and procedures can be found through the US Access Board (www.access-board.gov/evacplan.htm) and the *Emergency Procedures for Employees with Disabilities in Office Occupancies* document published by FEMA and the US Fire Administration.

2. Train City staff regarding emergency evacuation procedures with periodic drills, both announced and unannounced.
3. Review existing procedures dealing with emergencies to ensure that persons with disabilities can be alerted and that they can alert emergency service providers. Provide all evacuation policies and procedures in alternative formats. Explore the use of other technologies such as audible exit signs for orientation and direction and vibrating paging systems.
4. Departments that routinely provide emergency services should have priority for receiving equipment that accommodates alternative format communication.
5. Provide training for public safety personnel to enable them to communicate in American Sign Language in the event that there is an emergency condition and the area is being evacuated. For example, this training would be provided to police, firefighters, lifeguards, and building inspectors involved in post-earthquake emergencies.
6. Take the necessary steps to ensure that emergency teams are aware of people with disabilities in their communities who may require special assistance in the event of an emergency.
7. Provide American Sign Language interpreters at emergency facilities, on an as-needed basis. To accomplish this, form a pool of interpreters as a resource from which to draw.

2.2.10 Maintenance of Accessible Programs and On-going Accessibility Improvements

Self-Evaluation Findings: Although many of the City's public programs are accessible to people with disabilities, some are not accessible.

In addition, opportunities for the 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. As the City acquires new facilities and develops new programs, it will be necessary to review each of them for access compliance.

Recommended Actions:

1. Keep programs up-to-date through increased community involvement and partnerships with organizations that offer services to persons with disabilities.
2. Ensure that individuals with disabilities are not excluded from regular programs or are required to accept special services or benefits. Involve individuals with disabilities in regular programs to the maximum extent possible.
3. Maintain in working order equipment and features of facilities that are required to provide ready access to individuals with disabilities.
4. Modify policies, practices, or procedures to avoid discrimination unless the modification would fundamentally alter the nature of the program or create a hazardous situation.

5. Ensure that when specific requirements that exclude or limit the participation of persons with disabilities are necessary for the safe operation of programs, those requirements are based on real risks, not on speculation, stereotypes, or generalizations.
6. Evaluate each request for modification on an individual basis, and, when possible, the individual and the City department should determine an appropriate modification for the individual.

2.3 Findings and Recommended Actions—Unique Practices, Activities, and Programs

2.3.1 Municipal Code Review

The following review of the City of Stockton Municipal Code highlights certain requirements that may inadvertently reduce the accessibility of the programs, services, and activities available to the public. As a follow-up to this review, it is recommended that the City conduct a legal and policy review of alternative municipal code language.

The Municipal Code is comprised of the following sections:

- Chapter 1 General Provisions
- Chapter 2 Personnel
- Chapter 3 Administration
- Chapter 4 Public Safety Code
- Chapter 5 Public Welfare, Morals and Policy
- Chapter 6 Licenses and Permits
- Chapter 7 Health and Sanitation Code
- Chapter 8 Revenue and Taxation
- Chapter 9 Miscellaneous Regulations In Re: Public Streets
- Chapter 10 Traffic and Vehicle Code
- Chapter 11 Parking Meters Miscellaneous Parking Regulations
- Chapter 12 Franchises
- Chapter 13 Uniform Administrative Provisions for Construction Codes
- Chapter 14 Uniform Codes
- Chapter 16 Planning and Zoning Code
- Chapter 17 Redevelopment

Only those sections of the Municipal Code that were found to contain language that may inadvertently reduce the accessibility to programs, services, and activities available to the public are described below.

Chapter 1 General Provisions

Code Section: Part I, ADOPTION OF CODE

SEC. 1-009. MAINTENANCE OF CODE:

In accordance with the provisions of Section 13a, Article IV of the Charter of the City of Stockton, not less than three (3) copies of this Code shall be filed for use and examination by the public in the office of the City Clerk. Such copies shall be mounted in loose-leaf form to withstand heavy usage. Additional copies thereof shall be distributed to such

departments and divisions of the City as shall be prescribed by the City Manager.

Recommended Action:

1. Provide copies of Municipal Code sections in alternative formats, if requested (e.g., large print, Braille, audiotape, or computer disk).

Code Sections: Part III, RULES OF CONSTRUCTION

SEC. 1-016. "WRITING" INCLUDES:

Writing includes any form of recorded message capable of comprehension by ordinary visual means. Whenever any notice, report, statement or record is required or authorized by this Code, it shall be made in writing in the English language unless it is expressly provided otherwise.

SEC. 1-018. SERVICE OF NOTICES:

Whenever any notice is required to be given under this Code, the notice shall be served in the following manner unless a different procedure is specifically stated to apply:

- A. Personal service or certified mail, postage prepaid, return receipt requested. Simultaneously, the same notice shall be sent by regular mail to the Responsible Person. If a notice that is sent by certified mail is returned unsigned, then service shall be deemed effective pursuant to regular mail.
- B. Posting the notice conspicuously on or in front of the property.
- C. Mailings to the Property Owner shall be sent to the address listed in the last equalized assessment roll of the San Joaquin County Assessor.
- D. In the event the responsible person is someone other than the property owner, a copy of the notice shall also be mailed to the property owner. Service by certified or regular mail in the manner described above shall be effective on the date of mailing.

The failure of any person with an interest in the property to receive any notice served in accordance with this section shall not affect the validity of any proceedings taken under this Code.

The notice requirements in this section do not apply to initial Notices of Violation, which may be sent by regular mail. Service of a Notice of Violation by regular mail is effective on the date of mailing.

Recommended Action:

1. Accept legally authorized third-party signatures.

Chapter 3 Administration

**Code Section: Part I, THE CITY COUNCIL, Division I, COUNCIL MEETINGS –
TIME, PLACE AND PROCEDURE**

SEC. 3-001.4. POSTING OF AGENDA:

The City Clerk shall post an Agenda in a location which is freely accessible to the public at least seventy-two (72) hours before each regular meeting of the City Council.

Recommended Action:

1. Provide agendas in alternative formats, if requested (e.g., large print, audio tape, or Braille).

Code Section: Part I, THE CITY COUNCIL, Division I, COUNCIL MEETINGS

SEC. 3-003.8. ADDRESSING THE COUNCIL:

Any person desiring to address the Council shall first secure the permission of the Presiding Officer to do so; provided, however, that under the following headings of business, unless the Presiding Officer rules otherwise, any qualified and interested person shall have the right to address the Council upon obtaining recognition by the Presiding Officer.

- A. **WRITTEN COMMUNICATIONS:** Interested parties or their authorized representatives may address the Council by written communications in regard to matters then under discussion.
- B. **ORAL COMMUNICATIONS:** Persons may address the Council by oral communications on any matter concerning the City's business, or any matter over which the Council has control. Speakers may submit "Request to Speak" cards to the City Clerk who shall number them in the order in which they are received. The Presiding Officer shall call upon such persons to speak in such order, unless he/she determines that a different order is necessary to facilitate the conduct of the meeting.
- E. **MANNER OF ADDRESSING COUNCIL — TIME LIMIT:** Persons addressing the Council shall step up in front of the rail, shall give their name and address in an audible tone of voice for the record, provided, however, that the address need not be stated if it is contained in a request to speak form submitted to the Mayor prior to the agenda item being addressed by the Council. All remarks shall be addressed to the Council as a body and not to any member thereof. No person, other than the Council and the person having the floor shall be permitted to enter into any discussion, either directly or through a member of the Council, without the permission of the Presiding Officer. No question shall be asked a Council member except through the Presiding Officer. All comments presented to the Council under Agenda Items "Citizens' Announcements or Invitations" and "Citizens' Presentations" shall be strictly limited to a maximum of five (5) minutes provided, however, that the Presiding Officer may, with the consent of the Council, waive this limitation when deemed necessary to more fully accommodate a citizen's request to be heard.

Recommended Actions:

1. Provide an accessible podium or other method of approaching the rail.
2. Allow members of the public to utilize alternative methods of addressing the Council, including personal assistants, recorded messages, written communications, or other methods as may be suitable and consistent with the decorum of the Council chambers.

Code Section: SEC. 3-026. CERTIFICATE OF NONDISCRIMINATION:

Each bidder shall enclose with the bid submitted a certificate stating whether bidder is currently in compliance with all federal and State of California laws covering nondiscrimination in employment, and that bidder will pursue an affirmative course of action as required by affirmative action guidelines as set forth in Section 3-025 and resolutions adopted pursuant thereto, and that if awarded the contract bidder will not discriminate in the employment of any person under the contract because of race, color,

national origin, ancestry, sex or religion, and that bidder will participate, if requested, in pre-award review of bidder's qualifications under provisions of this Section. The requirements of this Section shall apply only to contracts in excess of twenty thousand dollars (\$20,000.00) for services and/or supplies.

Recommended Action:

1. Revise the Code to include "disability" in the list of nondiscrimination categories.

Chapter 4 Public Safety Code

Code Section: PART III, EMERGENCY ORGANIZATION AND FUNCTION

SEC. 4-058. EMERGENCY PLAN:

The City of Stockton Disaster Council shall be responsible for the development of the City of Stockton Emergency Plan, which plan shall provide for the effective mobilization of all of the resources of this City, both public and private, to meet any condition constituting a local emergency; state of emergency, or state of war emergency; and shall provide for the organization, powers and duties, services, and staff of the Emergency Organization. Such plan shall take effect upon adoption by resolution of the City Council.

Recommended Action:

1. Revise the Code to include provisions in the Emergency Plan for people with visual and hearing impairments, wheelchair users, and people with developmental disabilities.

Chapter 5 Public Welfare, Morals and Policy

Code Section: Part V, MISCELLANEOUS WELFARE, MORALS AND POLICY
REGULATIONS, Division 13, LEWD OR INDECENT ACTS —
PROSTITUTION, ETC.

SEC. 5-113. URINATING AND DEFECATING IN PUBLIC:

It shall be unlawful for any person to intentionally urinate or defecate in any place other than an approved lavatory facility.

Recommended Action:

1. Revise the Code to provide an exclusion for persons using ostomy and ileostomy appliances.

Code Section: Part X, LICENSING AND REGULATION OF OUTDOOR FESTIVALS

SEC. 5-302. APPLICATION FOR LICENSE AND FEE and;

SEC. 5-305. STANDARDS AND CONDITIONS:

Application for a license to conduct an outdoor festival shall be made in writing to the Director of Finance:

- (1) within twenty (20) days after the effective date of this ordinance if the outdoor festival is proposed to be conducted within sixty (60) days after the effective date of this ordinance, or
- (2) at least sixty (60) days prior to the time indicated for the commencement of the outdoor festival, in all other cases. The Application shall be accompanied by a nonrefundable application fee, of one hundred dollars (\$100.00) and shall contain the following information:

- (a) Identity. The true names, ages and residences, mailing addresses, telephone numbers and legal natures (such as individuals, partnerships, corporations, etc.) of
 - (1) the applicant; and
 - (2) all persons financially interested in the outdoor festival. The term "financially interested" shall include all persons who share in the profits of the festival, on the basis of gross or net revenue. If the application is made by a partnership, the names and addresses of all general partners shall be included. If the application is made by a corporation, the application shall be signed by the president and secretary thereof and shall contain the names and addresses of all corporate officers and a certified copy of the Articles of Incorporation shall be attached to the application.
- (b) Type of Festival. A statement of the kind, character, or type of festival which the applicant proposes to conduct, operate, or carry on.
- (c) Location and Parking. The location, legal description, area, and shape of the premises where the outdoor festival is proposed to be conducted; location and detailed plans for parking; the location of access to the property and all interior access ways; the location and detailed plans of all buildings and structures on the premises or to be erected, including the bandstand, stage, or other facility for performers; and the location of all loudspeakers. A map or diagram illustrating the aforementioned details shall be submitted with the application.
- (d) Authorization of Owners. Proof that the applicant owns said premises or the written authorization of all owners thereof for the proposed use and for parking on the area shown for parking facilities.
- (e) Dates and Hours. The date or dates and the hours during which the festival is to be conducted.
- (f) Estimate of Numbers. An estimate of the minimum and maximum numbers of customers, spectators, participants and other persons expected to attend the outdoor festival for each day it is conducted, together with detailed information supporting such estimate.
- (g) Program and Plans. A detailed explanation of the applicant's program and plans to provide the following:
 - (1) Provision for water for human consumption in a manner and amount sufficient to serve the anticipated customers.
 - (2) A detailed description of the proposed portable or permanent sanitary facilities.
 - (3) The location of parking area necessary to serve the anticipated customers together with provisions for grading, dust control, marking, and separation of the area by physical barriers from the area where patrons will watch the performance, together with provisions for parking attendants at the entrances and exits and within the parking lots.
 - (4) A map or diagram of the interior access ways showing provisions for the availability of emergency vehicles such as ambulance, fire,

- or police, together with the clear delineation by means of buffers on the ground.
- (5) The location, nature and type of medical and first aid facilities accompanied by agreements or contracts showing the specific doctors, first aid attendants, and ambulances that will be available at the time and place of performance.
 - (6) Provision for fire protection and fire safety measures.
 - (7) Provision for adequate lighting including location of all light standards and electrical switches.
 - (8) Provisions for public liability and property damages insurance.
 - (9) Provisions for a clean-up of the premises and adjoining property of litter and garbage resulting from the festival.
 - (10) Provision for emergency communications system.
 - (11) If it is proposed or expected that spectators or participants will remain at night or overnight, the arrangements for camping or similar facilities.
 - (12) Applicant's plans to provide for numbers of spectators in excess of the estimate.
 - (13) Plans and specifications of any temporary or permanent structures, including but not limited to bandstands or staging.
 - (14) A detailed explanation of applicant's plan for policing the activity with particular emphasis on the control and prevention of alcoholic beverage and drug consumption.
 - (15) Written consent of all owners of the premises to the entry at any time in the course of his duties of any peace officer, any officer or employee of the San Joaquin Local Health District, and any other federal, state, county, or municipal officer or employee in the performance of his duties.

Recommended Action:

1. Revise the Code to include in the information about the festival—and the requirements for the festival—provisions for providing accessible restrooms, parking, entry and exit, path of travel, and other amenities for persons with disabilities.

Code Section: Part VI, PENAL OFFENSES — INFRACTIONS AND MISDEMEANORS

SEC. 5-133. SIDEWALKS — OBSTRUCTIONS:

- A. Public Use of Sidewalks, Streets, etc.: To obstruct or cause to be obstructed any part of, or any part of the public use of any part of any public street, highway, avenue, sidewalk, space between sidewalk and street, crosswalk, wharf or bridge.
- B. Things Deemed Obstructions: The following named things but not to the exclusion of other things, shall be deemed obstructions within the meaning hereof:
 1. Any post, pillar, pole, sign or structure, not excepted by the provisions set forth herein, which stands or rests upon, within or in any of said public ways; any post, pillar, pole or mast for telegraph, telephone or electric light wires hereafter erected or placed otherwise than in that part of the

sidewalk space which is not less than eight inches (8") nor more than twenty-four inches (24") from the curb line.

Recommended Action:

1. Revise the Code to include the minimum width of a clear path of travel (i.e., 36 inches) that must be maintained.

Code Section: Division 2, USE OF PUBLIC PARKS

SEC. 5-022. UNLAWFUL ACTS IN PUBLIC PARKS:

- (h) To ride or drive any horse or other animal or any motorized vehicle, cycle, or scooter elsewhere than on the roads or drives provided for such purpose, or to drive a motor vehicle in an erratic or hazardous manner on any park roads, paths or parking areas.

Recommended Action:

1. Revise the Code to clearly define "motorized vehicle, cycle, or scooter" to avoid the prohibition of assistive mobility devices such as power wheelchairs, electric scooters, etc.

Chapter 7 Health and Sanitation Code

Code section: Part I, FOOD PRODUCTS AND FOOD, ESTABLISHMENTS, Division 8,
PUBLIC MARKET

SEC. 7-048. DOGS PROHIBITED, BICYCLES AND MOTORCYCLES —
RESTRICTED:

No dogs shall be allowed in those portions of the public streets or other places designated to be a public market during the hours said market shall remain open, nor shall any bicycle or motorcycle be allowed to remain in said places during said hours.

Recommended Action:

1. Revise the Code to exclude "companion" dogs accompanied by a person with a disability from the prohibition of dogs at the public market.

Chapter 9 Miscellaneous Regulations In Re: Public Streets

Code Section: Part IV, DRIVEWAYS

Recommended Action:

1. Require that driveways maintain a two (2) percent cross slope across a public sidewalk.

Code Section: Part II, STREETS, Division 1, EXCAVATIONS IN PUBLIC STREETS
AND PUBLIC PLACES

SEC. 9-021. PERMIT:

It shall be unlawful for any person, firm or corporation to make any excavation in any public street, alley or other public place in the City of Stockton without first obtaining a permit issued by the Director of Public Works.

Recommended Action:

1. Revise the Code to include a provision for maintaining an accessible path of travel during construction

Chapter 12 Franchises

Code Section: Part I, ACTIVE (UNEXPIRED) FRANCHISES, Division 4,
BUS BENCH FRANCHISE

SEC. 12-043.4. CONSTRUCTION:

- (1) No work shall be commenced under the provisions of this franchise until plans and specifications shall have been filed with and approved by the City Manager nor until a map showing the precise location of the benches to be installed shall be filed with the City Manager.
- (2) Benches shall be constructed of materials sufficiently durable to withstand normal wear and weather conditions, to prevent unauthorized removal from their sites, and to minimize other vandalism. Bench construction shall include substantial seats and backs, securely affixed to the bench base. An example of suitable construction would be wood back and seat bolted to a concrete base. The City reserves the right to determine suitability of construction. Benches shall be 42 inches or less in overall height, 30 inches or less in overall width and not less than 6 feet nor more than 8 feet in overall length.

Recommended Action:

1. Use the design standards for benches, which include backs, arm rests, and companion seating, found in *Accessibility Guidelines for Outdoor Developed Areas, Final Report*, US Access Board Regulatory Negotiation Committee, September 30, 1999 (see www.access-board.gov/outdoor/outdoor-rec-rpt.htm).

2.3.2 Transportation Services

Some City departments provide transportation to program participants in either City-owned or leased vehicles.

Self-Evaluation Findings: Not all transportation services provided by the City are accessible to people with disabilities. The accessibility of destinations for City-sponsored trips is not always taken into consideration.

Recommended Actions:

1. Provide accessible transportation services, if requested.
2. Before a trip is scheduled, evaluate the physical environment of the destination to determine the level of programmatic and physical accessibility. Include this information as a component of the registration information for all trips.
3. If the destination environment is not accessible to certain individuals, consider an alternate destination, or the department and the individual participant should determine the modifications that could be made to improve accessibility.

2.3.3 Special Events and Private Events on City Properties

Contained within the ADA are two titles that pertain to public and private entities. Public entities are not subject to Title III of the ADA. Conversely, private entities are not subject to Title II. In many situations, however, public entities have close relationships with private entities that are covered by Title III, with the result that certain activities may be at least indirectly affected by both Titles. This is the case with certain special events or private organizations that may use City facilities. City departments, especially the Parks and Recreation Department, facilitate special or private events on City property.

Self-Evaluation Findings: The City does not have procedures in place to ensure that special or private events held on City property are accessible to people with disabilities.

Recommended Actions:

1. Develop guidelines for ensuring that special and private events are accessible.
2. Ensure that events sponsored or co-sponsored by City departments have accessible advertising and are held at accessible locations. Provide additional accessible parking and restrooms based upon the capacity of the event. Inform the co-sponsor of any special events on City property of these requirements.
4. Inform concessionaires, lessors, clubs, and contractors using City facilities that all programs must be available to people with disabilities.
5. Provide concessionaires with information regarding the City's established procedures for ensuring the delivery of accessible services.

2.3.4 Contracts

The City provides some of its services, programs, and activities through contractors. The ADA requires that these contractors acknowledge that they have the same responsibility as the City to make the services, programs, or activities they provide accessible to persons with disabilities.

Self-Evaluation Findings: The City does not include specific contract language that requires its contractors to adhere to the requirements of the ADA. There appears to be minimal monitoring to ensure that contractors fulfill their obligation to facilitate the participation of individuals with disabilities in programs or activities operated on behalf of any given department or division.

Recommended Action:

1. Develop a process to monitor contractor compliance with the ADA.

3.0 Buildings, Facilities, and Parks Transition Plan

3.1 Introduction

The Transition Plan for Buildings, Facilities, and Parks combines the findings of the policy assessments, program evaluations, and facility surveys conducted by the City from January 2003 through August 2003.

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

- Identification of the architectural barriers to program access: Refer to the *City of Stockton Access Survey – Facility Reports*
- Identification of the specific barrier removal actions and architectural modifications: Refer to the *City of Stockton 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 the City of Stockton.

3.1.1 Overview—City of Stockton’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 on-going 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 process was accomplished using teams of surveyors equipped with measuring devices, facility diagrams, and survey forms. The surveys identify 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
Passenger Loading Zone
Curb Ramp
Walk
Exterior Ramp
Exterior Stairway

Site Furnishings
Grandstand or Bleacher
Swimming Pool
Game and Sports Area
Play Equipment Area
Viewing Area

Drinking Fountain
Telephone
Hazard
Sign
Door
Corridor or Aisle
Building Level
Interior Stairway
Elevator
Interior Ramp
Multiple User Restroom

Single User Restroom
Bathing Facility
Room
Eating or Dining Area
Auditorium
Library
Dressing or Locker Room
Turnstile
Picnic Area
Golf Course

3.1.3 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.

3.2 Transition Plan—Buildings, Facilities, and Parks

3.2.1 Barrier Removal Priorities—Citywide

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.

3.2.2 Barrier Removal Priorities—Within a Facility

The criteria listed below were used to assist in the determination of specific program-based barrier removal actions within a building, facility, or park 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 (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).

Since not all of barriers must be removed in order to provide program access, those barriers that limit access to programs 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 on-going 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 recommended actions apply to all new construction and renovation projects in the City:

Recommended Actions:

1. 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.
2. Prior to construction, schedule a review with the City's ADA Coordinator of all City plans and specifications for the construction of buildings, facilities, and parks. No project should proceed to construction without a completed and clean document review.
3. 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 Frames for Completion

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.

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. (NOTE: The table set forth below does not list the Priority Three items.)

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
Municipal Buildings		
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
Libraries		
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

	Priority One	Priority Two
Community Centers		
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
Community Parks		
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
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.

4.0 Sidewalks and Curb Ramps Transition Plan

4.1 Introduction

The Transition Plan for Sidewalks and Curb Ramps combines the findings of the review of the policies, procedures, and design standards for sidewalk and curb ramp programs and highlights those issues that may inadvertently reduce the accessibility of public rights-of-way in the City of Stockton. The Transition Plan is based on the City's curb ramp inventory, a series of interviews and meetings with City of Stockton staff, and a review of recent Public Works Department staff reports and resolutions.

4.1.1 Overview—City of Stockton's Approach

The City of Stockton maintains approximately seven hundred miles of streets, many of which contain curbs, gutters, and sidewalks. In accordance with the Stockton 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. However, in 1968 the City Council revised the Stockton Municipal Code to assume responsibility for repairs in cases where the damage is caused by City-owned trees (SMC 9-0030). In October 1986 the City Council approved a staff report recommending that the highest priority be given to the repair of sidewalks damaged by tree roots since the highest number of reported accidents involved pedestrians tripping and falling on damaged sidewalks. Tree-damaged curb and gutter repairs were given lower priority based on available funding.

As described in section 1.6, the City of Stockton has a number of programs devoted to making the City's streets and sidewalks more accessible: the new development and infill program; the Citizen Request program; the annual installation, repair, and maintenance program; street-related capital improvement projects; and federally aided street overlay construction projects. Public Works receives and evaluates requests from a variety of sources for sidewalk repairs on an ongoing basis. If repairs are warranted, Public Works undertakes temporary repairs and then places the location on a computerized database for future permanent repairs based on available funding.

The Public Works Department takes the lead in curb ramp construction co-ordination for the Parks Department, Community Development Department, local transit systems, and the City Manager's Office. The City has expended approximately \$1,070,000 installing 428 curb ramps since 1996. In 2003, five hundred segments of sidewalks and forty-five curb ramps were installed.

Based on Title II of the ADA, City departments and divisions having jurisdiction over the sidewalk and curb ramp programs reviewed current City policies and practices that may act as barriers to persons with disabilities. As part of this process, the City compared the design standards it currently uses for the construction of curb ramps to ADAAG and Title 24 standards. The City also conducted an inventory of curb ramps in the areas of the City with the highest levels of pedestrian traffic. These areas included locations providing access to state, county or local facilities, and offices, and areas adjacent to hospitals and frequently used bus routes

4.1.2 Evaluation/Survey Process

The City of Stockton inventoried the curb ramps in the areas of the City with the highest levels of pedestrian traffic. The inventory, which took place between February and May 2003, was systematically documented in a series of GIS maps (see Appendix F) and tables.

The areas surveyed included areas with the highest levels of pedestrian traffic, including the Central Business District of downtown and within a two-block perimeter of hospitals as follows:

- **Central Business District** - Area bounded by North Aurora Street, North Madison Street, East Park Street, and East Washington Street;
- **Vicinity of Kaiser Hospital** - Area bounded by Frontage Road, Hammertown Drive, Murray Drive, and Montauban Road;
- **Vicinity of Saint Joseph's Hospital** - Area bounded by North San Joaquin Street, Cemetery Lane, East Cleveland Street, and East Willow Street; and
- **Vicinity of Dameron Hospital** - Area bounded by North Stockton Street, North Madison Street, West Vine Street, and West Park Street.

The City also obtained information from the San Joaquin Regional Transit District, which identified locations along highly used bus routes where curb ramps should be located to enhance accessibility at bus stops. The District also provided information indicating where curb ramps could be located to create an accessible pathway to a bus stop. This information will be used by the Public Works Department in prioritizing the installation of curb ramps.

4.1.3 Priorities for Curb Ramp Repair, Replacement, and New Construction

To promote both efficiency and accessibility, the City of Stockton 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. 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 Self-Evaluation and Transition Plan, 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 that do not comply with ADAAG technical requirements and State of California standards.

In addition, to achieve or maintain program accessibility, it may be appropriate for the City of Stockton to establish an ongoing procedure for installing curb ramps upon request in areas frequented by individuals with disabilities who are residents, employees, or visitors.

However, when streets, roads, or highways are newly built or altered, the City must provide ramps or sloped areas wherever there are curbs or other barriers to entry from a sidewalk or path. Likewise, when new sidewalks or paths are built or altered, they must contain curb ramps or sloped areas wherever they intersect with streets, roads, or highways.

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.*
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.

4.2 Transition Plan—Sidewalks and Curb Ramps

4.2.1 General Policies and Practices

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

Recommended Actions:

1. Institute regular (annual or twice-yearly) public forums to supplement the curb ramp Citizen Request Program as part of the City's on-going responsibilities to improve accessibility for pedestrians.
2. Complete a Citywide curb ramp inventory to determine where ramps need to be repaired, replaced, or newly constructed to meet current ADAAG technical requirements and State of California standards.
3. Survey and document the suitability of the adjacent marked crossings, pedestrian traffic signals, and sidewalks connecting these curb ramps.
4. Formally assign a Public Works staff person as the coordinator of the curb ramp Citizen Request Program, curb ramp installations, and updating standard construction details.

5. Formally establish the policies associated with this Transition Plan by documenting and making the content of the policies available to the public.
6. Provide information on the City's curb ramp program to SJRTD in order to help coordinate the delivery of accessible transit services.

4.2.2 Standard Curb Ramp Construction Details

Self-Evaluation Findings: The City of Stockton has developed standard construction details for curb ramps as a way of enforcing compliance with ADAAG technical requirements and State of California standards (See Appendix D). These details are edited periodically, with the most recent versions updated and distributed in 2003. As part of the City's ADA Self-Evaluation and Transition process, the content of current standard construction details was reviewed. The review concluded that the details are substantially compliant with ADAAG standards. However, the review found that the details do not include accommodations for special conditions.

Recommended Action:

1. Revise the City's curb ramp construction details to include accommodations for special conditions. For example, the Access Board's Public Rights-of-Way Advisory Committee suggests, "the algebraic difference in grade at the ramp/street interface shall not exceed 11 percent" (see page 18 of the Board's Final Report at www.access-board.gov/rowdraft.htm). The Board's suggestion allows for special conditions such as the crown of the road being too steep at the base of the ramp.

4.2.3 New Development and Infill Program

Self-Evaluation Findings: The City of Stockton requires all new development projects and those projects occurring as infill or redevelopment to install sidewalks and curb ramps.

Recommended Action:

1. Continue to update City records to include the construction of new sidewalks and curb ramps.
2. Install curb ramps in pairs.
3. Provide sidewalks on both sides of the street.
4. Prioritize the completion of sidewalk routes during development projects.

4.2.4 Citizen Request Program

Self-Evaluation Findings: 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. This program is advertised in utility bills sent to all City utility customers every six months. It is also advertised on the City's cable television station (Channel 97) and in the local newspaper.

Program records are maintained in a spreadsheet format in the Public Works Department. Information gathered includes the date of the complaint, the location of the barrier or hazard, notes about the location and adjacent buildings, whether or not a City field crew has visited the location, the name of and contact information for the requesting party, and the date the ramp was

installed or repaired.

Citizen requests are not necessarily filled in order of request and prioritization for installation or repair is not based on order of request. For example, curb ramps that are substantially compliant with ADAAG and State of California standards are given a lower priority than those with more significant barriers or hazards.

The Public Works Department's response to high-priority requests/complaints offers a program that directly addresses the public's experiences and needs. Public Works staff members report that while some requests are made following injuries (slips or falls), most requests are made by the public when a curb ramp is needed in a location that is part of a daily/weekly pedestrian travel route. Most requests come from the older part of town where trees, power poles, and storm drains can obstruct curb ramp access. As of July 15, 2003, 125 curb ramp requests were listed in the Citizen Request Program's records. The oldest unfulfilled request was dated April 6, 1999. Most requests had been recorded within the last three years.

This Citizen Request Program fulfills the City's goal of locating path of travel barriers where program access is deemed necessary, and it is based on the direct experience and expressed needs of the public.

Recommended Actions:

1. Advertise the curb ramp Citizen Request Program on the City's website, within existing community organizations, the disabled community, and City departments, and to City staff and the general public.
2. Establish a method for assigning a formal priority ranking to each curb ramp request, in accordance with the criteria noted in section 4.1.3.

4.2.5 Annual Installation, Repair, and Maintenance Program

Self-Evaluation Findings: Sidewalk and curb and gutter work improvements are completed on a contract basis. Public Works receives repair requests from a number of sources (e.g., Citizen Request Program), makes temporary repairs, and then enters the work location into a computerized database. These locations are then used to develop construction projects as funds become available. A contract issued during fiscal year 2003/2004, for example, repaired four hundred eighty segments of sidewalk, curbs, and gutters and installed forty-seven curb ramps.

Recommended Actions:

1. Document the sidewalk sections and the number and location of new curb ramps constructed as part of this project. This curb ramp documentation and tracking will be in addition to the existing database for sidewalk segment locations.
2. Document how it is determined that a project will require frontage improvements, thus incorporating curb ramps into a construction project. This will establish a consistent method in which to ensure that curb ramps are installed, as they are needed.
3. Continue to update City records to reflect construction of new curb ramps.

4.2.6 Street-Related Capital Improvement Projects

Self-Evaluation Findings: Sidewalks and/or curb ramps are installed and/or repaired in all street related capital improvement projects such as widening a street or other related street upgrades.

Recommended Action:

1. Continue to update City records to include the construction of new sidewalks and curb ramps.

4.2.7 Federally Aided Street Overlay Construction Projects

Self-Evaluation Findings: During 2002 and 2003 the City of Stockton undertook a federally aided project for asphalt overlay construction of approximately thirty-six miles of arterial roadways. The City was advised in a May 23, 2003 memo from the California Department of Transportation, *Curb Ramps of Local Agency Federal-Aid Projects* (included in Appendix E) that all federally aided street overlay projects authorized after June 2003 would be required to provide or upgrade curb ramps to ADA standards. The memo further clarified that projects that were authorized prior to June 2003 should evaluate all of the curb ramps within the project and include a plan for compliance in an updated transition plan. As the City's project was authorized prior to June 2003, the City undertook the evaluation as required. The evaluation determined that the project included 464 ramps in need of upgrading. The locations of these ramps are listed in Appendix F.

Recommended Action:

1. Evaluate the relative priority of new curb ramps at the locations listed in Appendix F in accordance with the prioritization criteria noted in Section 4.1.3, construct new curb ramps at these locations as warranted, and report progress in future transition plan updates.

4.2.8 Time Frames for Completion

It is the goal of the City to complete a citywide inventory of sidewalks and curb ramps within a period of two 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 one to seven years, depending on immediate necessity, degree of complexity, and overall cost.

5.0 City of Stockton's Grievance Procedures for Complaints of Disability Discrimination

5.1 Introduction

ADA regulations require the City to have an internal grievance policy for the prompt resolution of complaints by a person with a disability who is denied City services or the benefits of any City program or activity because of that person's disability.

Self-Evaluation Findings: As a whole, City staff members are not aware of how and/or with whom the public would file a disability discrimination complaint, including what procedures to follow. The City does not have an adopted ADA Grievance Policy.

Recommended Actions:

1. Adopt an ADA Grievance Policy.
2. Notify all City staff of the City's Nondiscrimination Policy and its ADA Grievance Policy. In addition, notify staff members that ADA-related queries are to be directed to the ADA Coordinator.
3. Make available copies of the City's ADA Grievance Policy to the public upon request. The cost should not exceed the reasonable cost of producing and mailing such copies, provided that copies shall be available free of charge to other government agencies.
4. When requested, provide the City of Stockton's *Grievance Procedures for Complaints of Disability Discrimination* in an alternate format.

5.2 City of Stockton Grievance Procedures for Complaints of Disability Discrimination

The ADA requires the City of Stockton to provide equal access for all persons, regardless of disability, to the services, activities, programs, and facilities of the City.

The City of Stockton encourages the informal resolution of complaints or grievances based on alleged disability discrimination. An attempt shall be made to resolve such matters through informal means at any stage of processing.

ADA regulations require the City to have a formal grievance policy for the prompt resolution of complaints by a person with a disability who is denied City services or the benefits of any City program or activity because of that person's disability. The use of a formal complaint form is recommended but not required. Other arrangements for submission of a grievance, such as personal interview or tape recording, will be made available upon request.

When filed, the grievance should contain as much information as possible about the alleged discrimination (name, address, phone number, location, description of problems, etc.).

The written grievance should be submitted to the City's ADA Coordinator by the grievant and/or his or her designee as soon as possible following the alleged violation.

Following the receipt of the complaint, the ADA Coordinator or his or her designee should

respond in writing (or a method understood by the complainant) to the complainant and/or his or her designee. The response should offer a resolution or explain the position of the City of Stockton with respect to the complaint.

If the response by the ADA Coordinator does not satisfactorily resolve the issue, the complainant and/or his or her designee may file an appeal with the City Manager. The decision of the City Manager is final.

6.0 Program Accessibility Toolkit

Introduction

In order to facilitate access to City programs by all citizens, the City will assemble a general program accessibility toolkit that is distributed to all its departments. Each department will add to this toolkit when necessary to address its special needs. This toolkit will include information and technological devices that 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 toolkit:

Alternative Format Communications

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

American Sign Language Interpreters

A pool of on-call American Sign Language interpreters should be developed. This list should be routinely updated to ensure their availability. 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 should 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 should 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, City departments should have access to a device for encoding closed captioning on films and videotapes used for training and other programs.

Optical Readers

Equipment that can translate printed information into an audio format should be available to departments.

Text Telephone (TDD)

To the extent necessary, City departments should have access to a text telephone or have access to a telephone transfer service as required by the law and offered by public telephone companies.

Transportation

The San Joaquin Regional Transit District (SJRTD) offers an accessible, on-demand paratransit service to persons who, due to their disability, are unable to get to or from fixed route bus stops. Dial-A-Ride is a curb-to-curb service operating in the Stockton Metropolitan Area and is available every day of the year by appointment only. In addition to Dial-A-Ride, all SJRTD buses have wheelchair lifts for easy access by passengers who use wheelchairs or have difficulty climbing stairs.

Departments who provide transportation for their programs should provide accessible transportation as needed/requested by program participants. The City should continue to maintain its accessible transportation fleet. The City should 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 should 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 should be assembled and distributed 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 should be periodically updated to ensure that it includes current acceptable language for talking about disabilities.

Lending Library of Assistive Technology Equipment

The City should 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 should 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, which provides up-to-date links to assistive technology and disability-related resources.