

Table of Contents

PART 1 – EXECUTIVE SUMMARY	1
1.0 Overview	1
1.1 Purpose	2
1.2 Legislative Requirements	4
1.3 Summary	5
1.4 City Profile	7
1.5 Methodology	7
1.6 Definitions	9
PART 2 – ADA SELF-EVALUATION.....	13
2.0 Introduction	13
2.1 General Recommendations.....	14
2.2 Evaluation of Services, Programs, and Activities – Citywide	15
2.2.1 Public Notice and Written Notifications	15
2.2.2 ADA Coordinator:	18
2.2.3 Grievance Procedures.....	19
2.2.4 Fees and Surcharges	20
2.2.5 Use of Consultants.....	20
2.2.6 Access to Programs, Services, and Activities	20
2.2.7 Provide for Modifications to Policies, Practices, or Procedures:	21
2.2.8 Public Meetings	21
2.2.9 Equally Effective Communication	22
2.2.10 Distribution of Publications	25
2.2.11 Website Accessibility	25
2.2.12 Printed Information	26
2.2.13 Transportation	26
2.2.14 Telephones, Communication Devices, and Auxiliary Aids.....	27
2.3 Evaluation of Services, Programs, and Activities – Department Specific	28
2.3.1 Administrative Services Department.....	28
2.3.2 City Clerk’s Office.....	29
2.3.2 City Council and City Manager.....	31
2.3.1 Community Development	33

2.3.2 Public Works 34

2.3.3 Police Department..... 37

2.3.4 Parks and Recreation 39

PART 3 – TRANSITION PLAN..... 42

3.1 Overview 42

3.2 Facilities ADA Barrier Removal 44

3.2.1 Overview 44

3.2.1 Facilities Priorities 46

3.3 Right of Way ADA Barrier Removal..... 48

3.3.1 Overview 48

3.3.2 Methodology 48

3.3.3 Right of Way Priorities 52

3.4 Phasing and Expenditure Plan 53

3.5 Funding for Projects..... 54

3.6 Historical Structures 54

PART 4 – ADA TOOLKIT 55

4.1 Guidelines 55

4.2 List of ADA Resources 56

Appendix A: City Programs and Public Questionnaires 62

Appendix G: Sample Policies and Procedures 63

Appendix H: Disability Etiquette..... 64

Appendix I: Web Accessibility..... 65

Appendix J: ADA Primer for State and Local Governments 66

Appendix K: ADA Best Practices Toolkit – Effective Communication Requirement and DOJ Statement on Effective Communication 67

Appendix L: Commonly Asked questions about the ADA and Law Enforcement..... 68

LIST OF APPENDICES

VOLUME 1: SELF EVALUATION AND TRANSITION PLAN

- Appendix A** **City Programs, and Public Questionnaires**
- Appendix G** **Sample Policies and Procedures**
 - Appendix G-1: Grievance Policies and Procedures**
 - Appendix G-1: Notice under the Americans with Disabilities Act – ADA**
 - Appendix G-2: Grievance Policies and Procedures**
 - Appendix G-3: Sample Grievance Procedure**
 - Appendix G-4: Assistive Listening Systems**
 - Appendix G-5: Employment and ADA**
 - Appendix G-6: Reasonable Accommodation Request Form**
 - Appendix G-7: Public Meetings**
 - Appendix G-8: Public Notice**
 - Appendix G-9: Public Event Policy and Checklist**
- Appendix H** **Disability Etiquette**
- Appendix I** **Web Accessibility**
- Appendix J** **ADA Primer for State and Local Governments**
- Appendix K** **ADA Best Practices Toolkit: General Effective Communication Requirement and DOJ Statement on Effective Communication**
- Appendix L** **Commonly Asked Questions about the ADA and Law Enforcement**

VOLUME 2: FACILITY BARRIER ASSESSMENT REPORT

- Appendix B-1** **Facility Barrier Cost Table**
- Appendix B-2** **Facility Barrier Photo Report**

VOLUME 3: RIGHT OF WAY BARRIER ASSESSMENT REPORT

- Appendix C-1** **Right of Way Barrier Photo Report- Sidewalks**
- Appendix C-2** **Right of Way Barrier Photo Report- Curb Ramps**
- Appendix C-3** **Right of Way Barrier Photo Report- Transit Stops**
- Appendix C-4** **Right of Way Barrier Photo Report- Signalized Intersections**
- Appendix C-5** **Right of Way Barrier GIS Generated maps**

LIST OF ABBREVIATIONS

ADA	Americans with Disabilities Act
ADAAG	Americans with Disabilities Act Accessibility Guidelines
AFF	Above finished floor
ASL	American Sign Language
CASP	Certified Access Specialist
CBC	California Building Code
CDBG	Community Development Block Grant
CFR	Code of Federal Regulations
DDS	California Department of Development Services
DF	Drinking fountain
DG	Decomposed granite
DOJ	Department of Justice
DSA	Division of the State Architect
E.V.	Electric vehicle
FE	Fire extinguisher
ft	Foot / Feet
GPS	Global Positioning System
HUD	Housing and Urban Development
I.D.	Identification
ICC	International Code Council
in	inch
ISA	International symbol of accessibility
O.C.	Off center
POT	Path of travel
PROWAG	Public Right of Way Accessibility Guidelines
PSI	Pounds per square inch
TPD	Toilet paper dispenser
TTY	Text telephone
TTY/TDD	Telecommunication Device for the Deaf/TeleTYpewriter
US	United States
WC	Water closet

PART 1 – EXECUTIVE SUMMARY

1.0 Overview

The City of South Gate is committed to providing their programs, services, and facilities accessible to all without discrimination, while at the same time complying to the Americans with Disabilities Act (ADA) and other federal and state laws, codes and regulations, and Proposed Guidelines for Accessible Rights-of-Way (PROWAG).

It is the intent of the City to address and improve the following programmatic and physical accessibility barriers in the following areas:

Customer Service: Policies and practices that ensure individuals with disabilities can participate in the programs, activities and services provided by the City including: procedures for program modifications, and not charging additional fees for reasonable accommodation to the person with a disability for modification required to make a program accessible.

Outreach and Information: Notices, printed information, televised and audiovisual information, City website, public telephones and communication devices.

Training and Staffing: Raise the current level of training and experience of City staff with policies and procedures regarding providing services to individuals with disabilities.

Programs and Activities: Program eligibility and admission, public meetings, tours and trips, transportation services, the use of consultants or contractors to provide City services, emergency evacuation procedures, special events and private events on City properties, maintenance of accessible programs and ongoing accessibility improvements.

Accessible/Adaptive Equipment: The use of automated electronic equipment and auxiliary aids to assist individuals with disabilities participate in City programs.

Removal of Physical Barriers: Removal of physical barriers or obstacles that prevent or restrict the entrance or use of buildings, facilities, and public rights-of-way.

1.1 Purpose

This Self-Evaluation and Transition Plan analyzes two kinds of accessibility: program accessibility and physical accessibility. For there to be an absence of discrimination, both types of accessibility must be provided.

Program Accessibility: The policies, practices, and procedures that permit people with disabilities to participate and have access to important information. Individuals with disabilities shall be provided an equally effective opportunity to participate in or benefit from the City's programs and services. Program accessibility must be achieved by either structural or non-structural methods. Non-structural methods include acquisition or redesign of equipment, assignment of aids, and provisions of services at alternate sites.

Physical Accessibility: Requires that a facility be barrier-free. Barriers include any obstacles that prevent or restrict the entrance to or use of a facility or public rights-of-way.

The City may achieve physical accessibility by a number of methods:

- Structural methods such as altering an existing facility;
- Providing services at alternate accessible sites; and
- Designing or fixing public rights-of-way.

When choosing a method of providing program access, the City should give priority to the solution 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 must provide equality of opportunity. For example, the use of separate auxiliary counters to conduct transactions could be viewed as segregation; therefore, it is recommended that the main counters used for transactions and services are accessible.

Also note that per 28 CFR §35.150, a public entity shall operate each service, program, or activity so that the service, program, or activity, when viewed in its entirety, as readily accessible to and usable by individuals with disabilities. This does not necessarily require a public entity to make each of its existing facilities accessible to and usable by individuals with disabilities, nor require a public entity to take any action that would threaten or destroy the historic significance of a history property, nor require a public entity to take any action that it can demonstrate would result in a fundamental alteration in the nature of the service, program activity or in undue financial and administrative burdens. In circumstances where the personnel of the public entity believe that the proposed action would fundamentally alter the service, program or activity or would result in undue

financial and administrative burdens, a public entity has the burden of proving the compliance would result in such alteration or burdens.

Moreover, Title II (28 CFR Part 35) of the Americans with Disabilities Act has the broadest impact on the City of South Gate and is intended to protect qualified individuals with disabilities from discrimination on the basis of disability in the services, programs, or activities of all State and local governments. The ADA is enforced by the US Department of Justice through litigation. The law does not specifically state how the City must provide for accessibility to the programs, services, and activities, therefore the department-specific findings stated above can be considered as recommendations and potential ways to achieving accessibility. If the various departments chose not to implement any policy changes to make their programs and services accessible, they may be vulnerable to litigation.

Also note that the City may comply with the requirements of program accessibility through such means as redesign of equipment, reassignment of services to accessible buildings, assignment of aides to beneficiaries, home visits, delivery of services at alternate accessible sites, alteration of existing facilities and construction of new facilities, or any other methods that result in making its programs or activities readily accessible to and usable by individuals with handicaps. The City is not required to make structural changes in existing facilities where other methods are effective in achieving compliance with this section. In such cases, keeping record of these decisions is critical and the burden of proof of providing program accessibility will lie on the City.

1.2 Legislative Requirements

The American with Disabilities Act (ADA) is a wide-ranging civil rights law for persons with disabilities that prohibits discrimination and ensures equal opportunity for persons with disabilities in employment, State and local government services, public accommodations, commercial facilities, and transportation. There are five parts or Titles to the ADA:

- Title I of the ADA prohibits discrimination by employers against qualified individuals with disabilities in all aspects of employment.
- Title II covers State and Local Government activities and prohibits discrimination in the City's policies, programs, services, and facilities that are available to the public. The regulations are set forth in the 2010 Accessibility Standards, which have been adopted by the US Department of Justice, and used as the model code in the California Building Code.
- Title III prohibits discrimination on the basis of disability in the activities of places of public accommodations (businesses that are generally open to the public and that fall into one of 12 categories listed in the ADA, such as restaurants, movie theaters, schools, day care facilities, recreation facilities, etc.).
- Title IV addresses telephone and television access for people with hearing and speech disabilities; which requires telephone companies to provide telecommunication relay services.
- Title V contains supplemental regulations that are not explicitly covered in other parts of the law.

Title II has the broadest impact on the City of South Gate and is intended to protect qualified individuals with disabilities from discrimination on the basis of disability in the services, programs, or activities of all State and local governments. Title II also extends the prohibition of discrimination on the basis of disability established by Section 504 of the Rehabilitation Act of 1973, as amended, to all activities of State and local governments, including those that do not receive Federal financial assistance.

This ADA Self-Assessment and Transition Plan has been prepared to fulfill the requirements set forth in Title II of the Americans with Disabilities Act (28 CFR §35.105 and 28 CFR §35.150(d)); which requires that all public entities with 50 or more employees create a "transition plan" that sets forth the steps necessary to ensure compliance with ADA and its implementing regulations.

The California Code of Regulations, Title 24, Part 2 (commonly referred to as Title 24) mandates that all publically funded buildings,

structures and related facilities shall be accessible to and usable by persons with disabilities. Although California has adopted most of the Department Of Justice's implementation of the ADA guidelines, there are some differences. In general, the more restrictive requirements (whether federal or state) should be applied when designing accessible facilities. Title 24 was incorporated in the evaluation of architectural barriers as part of the Transition Plan described in Part 3 of this report.

The Unruh Civil Rights Act (Cal. Civ. Code § 51(f)) and the California Disabled Persons Act (Cal. Civ. Code § 52(a), 54(a)) allow plaintiffs to add state claims for money damages onto ADA lawsuits filed in federal court. This is not the case in other states, where ADA plaintiffs are entitled only to having an access issue remedied, plus attorney's fees.

The law prohibits excluding persons with disabilities or denied the benefits from the services programs, or activities offered by the City (28 CFR §35.130(a)); and it is the City's responsibility to provide access to its programs, services and activities in both owned and leased facilities (28 CFR §35.130(b)(4)). This document presents the results of the City's review of access programs, services and activities by persons with disabilities. This report will assist the City of South Gate to identify policy, program, and physical barriers to accessibility and to develop barrier removal solutions that will facilitate the opportunity of access to all individuals.

1.3 Summary

This plan is presented in four (4) parts and describes the process by which policies, programs, and facilities were evaluated for compliance with the ADA; presents the findings of that evaluation; and provides Recommendation to ensure compliance.

A survey of the City's sidewalks, curb ramps, and traffic signals with the right-of-way throughout the City was included in the physical barrier review along with review of City facilities.

Part 1: EXECUTIVE SUMMARY - This section provides an overview of the requirements for developing the Self-Evaluation and Transition Plan and outlines the plan development process.

Part 2: SELF-EVALUATION - The Self-Evaluation is the City's assessment of its current policies, practices, and procedures. The Self-Evaluation identifies and makes recommendations to correct those policies and practices that are inconsistent with Title II requirements. As part of the Self-Evaluation, the City:

- Identified the City's programs, activities, and services; and
- Reviewed the policies, practices, and procedures that govern the administration of the City's programs, activities, and services.

Part 3: TRANSITION PLAN – This section includes a review of physical barriers of sites for compliance with the Americans with Disabilities Accessibility Guidelines (ADAAG) and Title 24 of the California Code of Regulations (which is cited as the California Building Code) and a barrier removal/transition plan. The specific requirements for preparation of an acceptable Transition Plan are described in 28 CFR §35.150(d)(3). This plan includes:

- A list of the physical barriers in the City's facilities that limit the accessibility of its programs, activities, or services to individuals with disabilities;
- A list of physical barriers in the City's public rights-of-way that limit the accessibility of persons on sidewalks, curb ramps, intersections, and bus stops.
- A detailed outline of the methods to be used to remove these barriers and make the facilities accessible;
- A schedule for taking the steps necessary to achieve compliance with the ADA, Title II; and
- The name of the individual responsible for the plan's implementation.

Part 4: TOOL KIT – This section contains references to Federal, State, and other groups for the City to maintain the program accessibility guidelines, standards, and resources.

1.4 City Profile

The City of South Gate was incorporated in 1923 with a population of about 95,000 residents. It is the seventeenth largest City in Los Angeles County, with 7.4 square miles. It is located 7 miles southeast of Downtown Los Angeles. The City Council consists of five persons elected at large by the residents of South Gate. These Council members serve a four-year term and establish the governing policies and procedures for the City. The Mayor is selected on an annual, rotating basis from among the Council Members

1.5 Methodology

The process to implement the City of South Gate's ADA Self-Evaluation and Transition Plan included discussions with department heads and employees; the administration of departmental program accessibility questionnaires; a review of the City's published rules, regulations and policies; a survey to identify physical barriers in public facilities and streets; and a public involvement process to obtain input from the public and to review the draft.

A citywide survey of the sidewalks, curb ramps, and traffic signals with the right-of-way throughout the City was also performed in this study. The City has an ongoing public sidewalk maintenance problem.

Self-Evaluation:

Policies, programs, and procedures were evaluated to determine current levels of service and the extent to which its policies and programs created barriers to accessibility for persons with disabilities. A departmental program and policy questionnaire was sent to all City Departments. From this questionnaire and follow-up interviews, 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.

The self-evaluation process identified accessibility issues that have both City-wide and department specific impacts. Specific issues have been identified and presented into actions that need to be implemented. Issues that have commonality across all departments have been incorporated into policy recommendations for overall application. Findings from each department's report and recommendations can be found in Part 2 and a copy of the blank questionnaire can be found in Appendix A.

Transition Plan:

The Transition Plan was prepared by performing the following steps:

- A physical site investigation of City facilities (both interior and exterior as required) was performed to determine what alterations might be necessary in order to meet ADA Accessibility Guidelines.
- A physical site investigation of all City sidewalks, curb ramps, intersections and bus stops was performed to determine any alterations that might be necessary in order to meet public rights-of-way guidelines.
- A barrier assessment inventory with photos was developed and includes recommended improvements needed to remove the physical barriers. Reference to code defining the barrier is included.
- Preliminary estimates on the costs of the alterations that would be necessary to remove barriers and make City facilities fully accessible was performed.
- The barriers were prioritized and an implementation schedule was developed.

Owen assessed the following City facilities:

Boy Scout Camp	Police Department
Civic Center	Sports Center
City Hall Exterior	Swim Stadium
City Hall	Westside Resource Center
Court House	Cesar Chavez Park
City Yard (Field Operations)	Circle Park
Golf Course	Hollydale Community Park
Girls Club House	Hollydale Regional Park
Gardendale Tot Lot	South Gate Park
Hollydale Resource Center	Stanford Park
Municipal Auditorium	State Street Park
Margaret Travis Senior Center	Triangle Park

Public Outreach:

Title II of the ADA (28 CFR §35.105(b) and 28 CFR §35.150(d)(1)); requires that the City provide opportunities by individuals with disabilities, organizations representing individuals with disabilities and other interested individuals to participate in the development of the Transition Plan by submitting input into the self-evaluation process.

1.6 Definitions

The following is a summary of various definitions found in the ADA. Please refer to the Americans with Disabilities Act for the full text of definitions and explanations.

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

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

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

Discrimination on the Basis of Disability: Discrimination on the basis of disability means to:

- Limit, segregate, or classify a citizen in a way that may adversely affect opportunities or status because of the person's disability;
- Limit, segregate, or classify a participant in a program or activity offered to the public in a way that may adversely affect opportunities or status because of the participant's disability;
- Participate in a contract that could subject a qualified citizen with a disability to discrimination;
- Use any standards, criteria, or methods of administration that have the effect of discriminating on the basis of disability;
- Deny equal benefits because of a disability;
- Fail to make reasonable accommodations to known physical or mental limitations of an otherwise qualified individual unless it can be shown that the accommodation would impose an undue burden on the City's operations;
- Use selection criteria that exclude otherwise qualified people with disabilities from participating in the programs or activities offered to the public; and

- Fail to use tests, including eligibility tests, in a manner that ensures that the test results accurately reflect the qualified applicant's skills or aptitude to participate in a program or activity.

Complaint: A complaint is a claimed violation of the ADA.

Physical or Mental Impairments: Physical or mental impairments may include, but are not limited to: vision, speech, and hearing impairments; emotional disturbance and mental illness; seizure disorders; mental retardation; orthopedic and neuromotor disabilities; learning disabilities; diabetes; heart disease; nervous conditions; cancer; asthma; hepatitis B; HIV infection (HIV condition); and drug addiction if the addict has successfully completed or is participating in a rehabilitation program and no longer uses illegal drugs.

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

Substantial Limitations of Major Life Activities: An individual is disabled if she or he has a physical or mental impairment that (a) renders her or him unable to perform a major life activity, or (b) substantially limits the condition, manner, or duration under which she or he can perform a particular major life activity in comparison to other people.

Major life activities are functions such as caring for oneself, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working. In determining whether physical or mental impairment substantially limits the condition, manner, or duration under which an individual can perform a particular major life activity in comparison to other people, the following factors shall be considered:

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

Having a Record of Impairment: An individual is disabled if he or she has a history of having an impairment that substantially limits

the performance of a major life activity; or has been diagnosed, correctly or incorrectly, as having such impairment.

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

Reasonable Program Modifications: If the individuals' disabilities prevent them from performing the essential functions of the program or activity, it is necessary to determine whether reasonable program modifications would enable these individuals to perform the essential functions of the program or activity. Reasonable program modification is any change in program or activity or in the way things are customarily done that enables an individual with a disability to enjoy equal program opportunities. Accommodation means modifications or adjustments:

- To a registration or application process to enable an individual with a disability to be considered for the program or activity;
- To the program or activity environment in which the duties of a position are performed so that a person with a disability can perform the essential functions of the program or activity; and
- That enable individuals with disabilities to enjoy equally the benefits of the program or activity as other similarly situated individuals without disabilities enjoy. Modification includes making existing facilities and equipment used by individuals readily accessible and usable by individuals with disabilities.

Modification applies to:

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

Modification is not required if:

- It changes the essential nature of a program or activity of the person with a disability;
- It creates a hazardous situation;

- Adjustments or modifications requested are primarily for the personal benefit of the individual with a disability; or
- It poses an undue burden on the City.

Undue Burden: The City shall not provide an accommodation that imposes an undue burden on the operation of the City's business. Undue burden means significant difficulty or expense incurred in the provision of accommodation. Undue burden includes, but is not limited to, financial difficulty. Undue burden refers to any modification that would be unduly costly, extensive, substantial, or disruptive, or that would fundamentally alter the nature of operation of the business of the City. Whether a particular accommodation will impose an undue hardship is determined on a case-by-case basis. If a particular modification is determined to cause an undue burden to the City of South Gate, the City shall attempt to identify another modification that would not pose such a burden. If cost causes the undue burden, the City must consider whether funding for the modification is available from an outside source. If no such funding is available, the City must give the person with a disability the opportunity to provide the modification or to pay for that portion of the modification that constitutes an undue burden. The following factors shall be considered in determining whether a program modification would create an undue burden: the nature and cost of the modification; the financial resources of the City available to make the modification; the impact the expense of the accommodation will have on the affected City operation; and the permanence of the alterations affecting the site.

Auxiliary Aids and Services: The term auxiliary aids and services include:

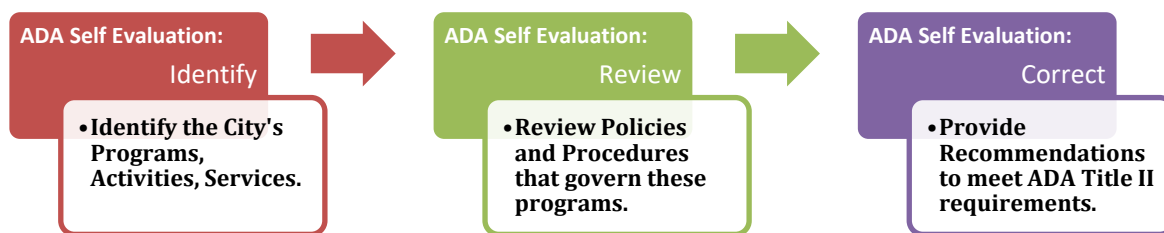
- Qualified interpreters or other effective methods of making orally delivered materials available to individuals with hearing impairments,
- Qualified readers, taped texts, or other effective methods of making visually delivered materials available to individuals with visual impairments;
- Acquisition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

PART 2 – ADA SELF-EVALUATION

2.0 Introduction

This Self-Evaluation is the City’s assessment of its current policies, practices, and procedures. It identifies and makes recommendations to correct those policies and practices that are inconsistent with ADA Title II requirements. As part of the Self-Evaluation, the City [1] identified programs, activities, and services; and [2] reviewed the policies, practices, and procedures that govern the administration of the City’s programs, activities, and services. Also part of this Self-

Figure 1: Components of ADA Self-Evaluation



Evaluation is various recommendations to meet ADA Title II requirements.

Policies, programs, and procedures were evaluated to determine current levels of service and the extent to which its policies and programs created barriers to accessibility for persons with disabilities. A departmental program and policy questionnaire was sent to all City Departments. From this questionnaire and follow-up interviews, 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.

The self-evaluation process identifies public accessibility issues that have both City-wide and department specific impacts. Specific issues have been identified and presented into actions that need to be implemented. Issues that have commonality across all departments have been incorporated into policy Recommendation for overall application. This section presents the findings and Recommendation from each department. A copy of the blank questionnaire can be found in Appendix A.

2.1 General Recommendations

These recommendations are the ongoing efforts and business practices to maintain accessibility to programs and services.

1. Public Review: This plan should be available public review (28 CFR §35.150(d)(1)). The City should maintain this plan (in all the appropriate alternate formats) for public access review and inspection.
2. Terminology: Although not a code requirement, City publications should be reviewed to see if the word “handicapped” is used. The words “individuals with disabilities” or “persons with disabilities” should replace “handicapped”. The term “disabled person” should also be avoided.
3. Prohibition Against Discrimination and Nondiscriminatory Treatment: (28 CFR §35.130(a) and (b)(1)(i)thru(iv)) The ADA prohibits public entities from excluding persons with disabilities or denied the benefits from the services programs, or activities offered by the public entity. This is accomplished by the City completing the following actions:
 - a) The completion of this self-evaluation and transition plan is a significant step in ensuring the City does not have and discriminatory treatment.
 - b) Maintenance of Records: For three years after completion of the self-evaluation, the City must keep a record of any problems identified (28 CFR §35.105). Ongoing customer satisfaction surveys and other methods for public input will assist with ongoing input to enhance the efforts of the City to serve individuals with disabilities; therefore, the City should maintain the public input questionnaire available to the public.
 - c) The City shall budget and implement the recommendations in the transition plan presented in this report.
 - d) Maintenance of Accessible Features: The City needs to develop and implement a maintenance program for their accessible features and elements (28 CFR §35.133).
 - e) Training: On-going compliance with the ADA can only be achieved if City staff and officials receive training. Although training is not required by the ADA, continuing training regarding the requirements of the ADA is recommended. The City should develop and implement an annual training program for all employees. The staff training program needs to include the following subjects:

4. Disability etiquette: Staff members who interact with the public should be aware of the many tips on interacting with individuals with disabilities. Refer to Appendix H for Disability Etiquette.
5. Acceptable methods for reasonable accommodations: Staff members should be aware of simple and easy methods to accommodate individuals with disabilities.
6. Resources available: Staff members should know about auxiliary aids, services, assistive listening devices etc. available. All staff members should know where to look and who to call.
7. ADA Coordinator: Consider the various organizations that hold training specifically for ADA coordinators, such as the ADA Coordinator Certification Program and the National Association of ADA Coordinators.
8. Accessible PDF: Regardless of whether documents are created in Adobe PDF, Microsoft Word, or another format, there are right and wrong ways to create documents in order to ensure people with disabilities can access them. It is advisable to provide training to City Staff on PDF accessibility.

2.2 Evaluation of Services, Programs, and Activities – Citywide

2.2.1 Public Notice and Written Notifications 28 CFR §35.106 28 CFR §35.163

Requirement:

The City needs to inform the public of their rights and protections provided by ADA and ensure that interested persons, including persons with impaired vision or hearing, can obtain information as to the existence and location of accessible services, activities, and facilities. The law requires the following:

- Provide information to applicants, participants, beneficiaries, employees and other interested persons of the rights and protections afforded by Title II of the ADA;
- All written materials must include notice of non-discrimination;
- Provide Title II information in alternative formats to ensure that the information is accessible to people with disabilities.

The law does not specifically state how the City must provide for accessibility to the City's programs, services and activities. One method is to publish information in a variety of locations and formats to enhance the access to programs, services and activities of the City.

Findings:

1. The Notice Under The Americans With Disabilities Act generally should be posted at the public counters and bulletin boards. A sample copy of a notice is included in Appendix G-1: Notice Under the Americans with Disabilities Act.
2. Public notifications regarding events and registration often do not include nondiscrimination language.
3. When there is a public notification, it does not always identify a contact person for individuals with disabilities who may request program modifications, or information on how a hearing or speech impaired person could communicate by telephone.
4. City Council Meeting agendas: The City Council meeting agendas have the same basic Notice of Compliance and indicate a phone number to call if an individual with a disability has a request for assistance. "In compliance with the American with Disabilities Act, if you need special assistance to participate in the City Council Meetings, please contact the Office of the City Clerk." These Notices of Compliance for the various public meetings comply with the requirements of the ADA. Thus, no modifications or additions are required.
5. The following agendas were also reviewed and found that the ADA Notice of compliance was included.
 - Successor agency
 - Southeast Water Coalition (SEWC)
 - Public Utility Authority
 - Public Financing Authority
 - Public Access Corporation
 - Planning Commission
 - Parks and Recreation Commission
 - Oversight Board
 - Housing Authority
6. The following agendas were reviewed and found that the ADA Notice of compliance was not included.
 - South Gate Citizen's Advisory Committee

Recommendations:

1. Ensure that the ADA Public Notice regarding the City's commitment to providing accessible services continue to be posted on all City information boards and kiosks that will maximize public exposure. Non-discrimination

language should continue to appear on all meeting agendas, and all written materials.

2. The non-discrimination language and public notices should include a list of those City agencies, departments, and specialized services that offer TTY/TDD in printed City directories.
3. The non-discrimination language and public notices should include a statement that the information is provided in alternate formats for persons with disabilities and that the City provides appropriate auxiliary aids and services where necessary to afford an individual with a disability an equal opportunity to participate in, and enjoy the benefits of, a service, program, or activity.
4. The identity, title, address, phone number and e-mail address of the ADA Coordinator needs to be included with the non-discrimination language and public notices.
5. Some alternative ways to provide the Notice to Interested Persons: Include with job applications, publish in local newspapers, publish on the City Website, post notice at all facilities, include in program handouts, include in activity schedules, and publish at bus shelters and another public transit stops.
6. Add the ADA Notice to the following agenda:
 - South Gate Citizen’s Advisory Committee

2.2.2 ADA Coordinator:
28 CFR §35.107(a)

Requirement:

ADA requires that the City designate at least one employee to coordinate ADA compliance. The regulations require the City to make available to interested persons the name, office address and telephone number of the ADA coordinator.

Finding:

The City has a designated ADA Coordinator.

Mr. Art Cervantes / ADA Coordinator

8650 California Avenue
South Gate, CA 90280
Phone: 323-563-9500
Email: acervantes@sogate.org

Recommendation:

1. A Citywide periodic training program should be established explaining the roles and responsibilities of the ADA coordinator and the resources available for ADA compliance.
2. The contact information of the ADA coordinator should be made available on the website.

2.2.3 Grievance
Procedures 28
CFR §35.107(b)
and 28 CFR
§35.170 thru 178

Requirements:

The City is required to adopt and publish grievance procedures which provide for the prompt and fair resolution of complaints alleging any action that would be prohibited by the ADA.

A Grievance Procedure should include a description of how and where a complaint can be filed, a statement that alternative means of filing can be made available to people who require such an alternative, description of the time frame and processes to be followed, information on how to appeal an adverse decision, statement of how long complaint files will be retained.

Once the City established the grievance procedure, it should be distributed to all agency heads, posted in public spaces, and on the City website.

Findings:

1. The City does not have formal published grievance procedures.
2. Questionnaires indicate that City staffs are generally not aware of how and with whom to file a disability discrimination complaint.

Recommendations:

1. Adopt a Citywide Grievance policy, application process, and form. The policy should include process for determining whether a policy or practice modification would fundamentally alter the nature of the program or service being offered. A sample policy included in Appendix G-2: Sample Grievance Procedure.
1. Ensure that the ADA notice is posted at all public counters. This notice includes information about how and with whom to file a disability discrimination complaint.
2. Provide staff training on how and with whom to file a disability discrimination complaint.

2.2.4 Fees and
Surcharges 28 CFR
§35.130(f)

Requirement:

The City cannot charge a fee or add a surcharge to cover the cost of making their facilities, programs, services or activities accessible to persons with disabilities.

Finding:

From the review of the policies, there are no circumstances in which a person with a disability would be asked to pay a fee or meet any other requirement not imposed on other program participants for the City.

2.2.5 Use of
Consultants 28 CFR
§35.130(b)(5)

Requirement:

The City cannot use contract procurement criteria that discriminate against persons with disabilities. Further, contractors should be held to the same nondiscrimination rules as apply to the City.

Findings:

The City Departments normally have all contracts be reviewed by the City Attorney to ensure that outside consultants are notified of their responsibilities for providing services in a nondiscriminatory manner. This is a normal practice; however, there is no written policy describing this process.

Recommendation:

Develop a written policy describing the requirement that all contracts must be reviewed by the City Attorney and include language that notify outside consultants of their responsibilities for providing services in a nondiscriminatory manner. The contracts should include the City's policy regarding accessibility for individuals with disabilities.

2.2.6 Access to Programs,
Services, and Activities 28
CFR §35.130(b)(3)

Requirement:

The City may not adopt official policies that are discriminatory or engage in practices that are discriminatory. This prohibition applies to policies that are explicitly exclusionary and to those which appear to be neutral but have a discriminatory effect.

Findings:

In general, from the review of policies, the City has no policies or practices that could have the direct or indirect effect of excluding or limiting the participation of individuals with disabilities.

Recommendation:

Develop a Citywide policy that describes the City’s commitment that they will not adopt any policies that are discriminatory or engage in practices that are discriminatory.

2.2.7 Provide for
Modifications to Policies,
Practices, or Procedures:
28 CFR §35.130(b)(7)

Requirement:

Procedures and policies shall allow for reasonable modifications to policies, practices or procedures, when such modifications are necessary to offer goods or services, etc., to individuals with disabilities unless doing so would fundamentally alter the goods or services, etc. (28 CFR §35.150(a)(3) and 28 CFR §35.164).

Finding:

1. The City does not have any formal policy, forms, or training on reasonable modifications to City policies, practices, or procedures.
2. The City does not have a process for determining whether a policy or practice modification would fundamentally alter the nature of the program or service being offered.
3. Auxiliary aids (such as tools, adjustable work tables, etc.) are generally not available to assist persons with disabilities.

Recommendation:

1. Develop reasonable accommodation policy, application process, and form. The policy should include process for determining whether a policy or practice modification would fundamentally alter the nature of the program or service being offered.
2. The policy should also require, when appropriate and when requested, that the City will provide or make available auxiliary aids that would allow a person with disabilities to participate in programs.

2.2.8 Public Meetings
28 CFR §35.130(d)

Requirement:

Services, programs, and activities must be conducted in the most integrated setting appropriate to the needs of qualified individuals with disabilities where possible, the same setting offered to others.

Finding:

Almost every City department is responsible for holding public meetings. Generally, public meetings are held in locations that are accessible to persons with mobility impairments. The physical architectural barriers of each facility are described in Part III. However, most City departments indicated that they need training on how to respond to requests for other accommodations. City

Council and Advisory Board Agendas describe that assistive listening systems for the Council Chambers and American Sign Language Interpreters are available through the City Clerk's office with at least forty-eight (48) hours advance notice for meetings. There have been no recent requests for these services. The City does not have any assistive listening devices available nor is there a list of sign language interpreters available.

Recommendation:

- Refer to Section 2.1.9 below regarding requirements for effective communications and recommendations.
- Purchase assistive listening devices for all conference rooms and public meeting rooms that use sound amplification systems.
- Identify and have available a list of interpreters, readers, etc. to be used to accommodate requests.
- Revise the City policy to require all public meetings and special events shall be held in accessible locations.

2.2.9 Equally Effective
Communication
28 CFR §35.160(a)

Requirements:

The City must ensure that members of the public, applicants, and participants with disabilities have communication access that is equally effective as that provided to persons without disabilities. In order to meet the ADA's communication standards, City departments need to be able to have a reasonable accommodation policy to provide information in alternative formats such as using easy-to understand language, Braille, large-print format, audiotape, or computer disk.

The City must provide appropriate auxiliary aids and services where necessary to afford an individual with a disability an equal opportunity to participate in, and enjoy the benefits of, a service, program, or activity. (28 CFR §35.160(b)(1))

Findings:

1. Most City departments and offices produce printed information that is available to the public.
2. While some City departments distribute information about obtaining printed information in alternate formats, other departments do not.
3. Most registration forms, permits, and waivers are only available in written form.

4. The City does not have a list of available a list of interpreters, readers, etc. to be used to accommodate requests.

Recommendation:

1. Develop a Citywide policy and provide information to each department on how to produce printed information in alternative formats for persons with various disabilities to ensure that requests are handled in a uniform and consistent manner. This policy should describe the reasonable accommodations (e.g., staff assistance), upon request, to assist in filling out forms or when alternative formats are unavailable or infeasible and that all requests for other alternative formats or lengthy documents on an individual basis.
2. The Citywide policy should describe 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. Refer to section 2.1.1 above on posting a publicizing the City's notice and commitment.
3. When publications are accompanied by illustrations, the City should include images of individuals with and without disabilities.
4. Ensure that interested persons, including persons with impaired vision or hearing, can obtain information as to the existence and location of accessible services, activities, and facilities (28 CFR §35.163). This information should be included in the Citywide policy and training of staff. The posting of appropriate signage is addressed in Part III of this report.
5. Include a notice on all materials printed by the City that are made available to the public that the publications can be made available upon request in alternative formats, such as, Braille, large print, audiotape, or computer disk. Include the contact information for processing the request.
6. Provide program, facility, permits, and reservation information in a variety of formats upon request (for example, in large-print format for persons with visual disabilities or in simple language for persons with cognitive disabilities).
7. The City should purchase assistive listening devices. Systems and devices to amplify sound for persons with hearing disabilities should be available for public meetings and events. 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. In determining what type of auxiliary aid and service is necessary primary consideration shall be given to the requests of the individual with disabilities. (28 CFR §35.160(b)(2))

8. Identify and have available a list of interpreters, readers, etc. to be used to accommodate requests for these services. (28 CFR §35.160(c))
 - a. Interpreters should be provided as determined through the request for accommodation process or in circumstances where an interpreter is known to be required. The City must ensure that those individuals utilizing a language other than English and are deaf, are also provided interpreter services that specialize in signing for that language.
9. Where the City communicates by telephone with applicants and beneficiaries, ensure that TDD's or equally effective telecommunication systems are used to communicate with individuals with impaired hearing or speech. (28 CFR §35.161)
 - a. The City does not have a main TDD number, and none of the departments have sufficient demand to install their own TTY/TDD.
 - b. Request that the phone company provide an amplification device, a shelf, and text telephone (TDD/TTY) or an outlet for a text telephone at a single location available for all departments to be able to use if required. Ensure that the Citywide policy and staff training describe the existence and location of this resource.
 - c. Train staff in use of TDD/TTYs and the 711 California Relay System.

2.2.10 Distribution of
Publications
28 CFR§35.163(b)

Requirement:

Materials need to be displayed in departments and areas that are accessible for individuals with disabilities.

Finding:

The City provides materials available for public review in locations that are accessible to persons with disabilities.

Recommendation:

The City should develop a written policy describing the requirement that material on display and available for public review must be accessible for individuals with disabilities.

2.2.11 Website
Accessibility 28 CFR
§35.149 and 28 CFR
§35.163(a)

Requirement:

The ADA Title II and the Rehabilitation Act of 1973 generally require that state and local governments provide qualified individuals with disabilities equal access to their programs, services, or activities. One way to help meet these requirements is to ensure that government websites have accessible features for people with disabilities.

Findings:

1. The internet is an important tool used by the City of South Gate to do business. The City of South Gate routinely makes information about their programs, activities, and services available to the public by posting it on their website. As a result, many people can easily access this information. The website also allows the public to participate in at any time of day and without the assistance of government personnel. The City website is <http://www.cityofSouth Gate.org/>
2. A preliminary review of the City's website was performed using the W3C Web Accessibility initiative, "Easy Checks – A First Review of Web Accessibility." The purpose of this check is to perform an initial assessment of web page accessibility. The assessment is not comprehensive; a web page could seem to pass these checks, yet still have accessibility barriers. The detailed results of the website review is presented in Appendix I: Website Accessibility.

Recommendations:

1. The City should perform a thorough web accessibility evaluation. The checks performed of the website are not definitive and only covers a few issues. A robust evaluation is needed to evaluate all issues comprehensively.
2. An agency with an inaccessible website may also meet its legal obligations by providing an alternative accessible way for citizens to use the programs or services, such as a staffed telephone information line. These alternatives, however, are unlikely to provide an equal degree of access in terms of hours of operation and the range of options and programs available.

2.2.12 Printed Information Requirement:

The law requires that the City ensures that individuals with disabilities have communication access that is equally effective as that provided to persons without disabilities. In order for the City to meet the ADA communication standards, the City must be able to provide information in alternative formats.

Finding:

In general, City departments do not have alternate communication formats available. Staff indicated that they have limited understanding of the requirements and types of accessible alternate formats and did not have a procedure to produce accessible alternate formats.

Recommendation:

The City should develop and adopt a policy that describes where appropriate or when requested, the City should provide documents and publications such as large print, Braille, audiotape, computer disk, pictorial signage, etc. for individuals with disabilities.

When publications are accompanied by illustrations, images of individuals with and without disabilities should be included.

2.2.13 Transportation

Requirement:

Services and programs offered by the City to the public must be accessible. Accessibility applies to all aspects of the program or service including transportation.

Finding:

The Parks and Recreation Department offers a local transit bus system for South Gate residents called GATE (Get Around Town Express).

Recommendation:

The City should develop a written policy describing accessibility requirements for programs that provide transportation. The policy should include a provision for the destinations of trips to be accessible to people with disabilities. This policy also should include the resources available to the departments. The policy should describe how individuals with visual disabilities are escorted door-to-door and that sign language interpreters will be provided when requested.

2.2.14 Telephones,
Communication Devices, and
Auxiliary Aids 28 CFR
§35.161

Requirements:

The law requires that where the City communicates by telephone, text telephones (TDD/TTY) or equally effective telecommunication systems must be used.

Services and programs offered by the City to the public must be accessible. Accessibility applies to all aspects of the program or service including provisions for auxiliary aids.

Findings:

The City does not have TDDs/TTYs nor are the staff members trained in the use of TDD/TTY equipment or other means of communicating over the telephone with a person with hearing and speech disabilities, such as the 711 California Relay System.

Recommendation:

The City should acquire or gain access to TDDs/TTYs and ensure that staff members are trained in the use of TDD/TTY equipment or other means of communicating over the telephone with a person with hearing and speech disabilities. This system should be available for use by all City Departments as required.

2.3 Evaluation of Services, Programs, and Activities – Department Specific

2.3.1 Administrative Services Department

The Administrative Services Department oversees many of the City's day to day government operations including business licenses, City budgeting and financial planning, IT support, purchasing, utility billing, human resources, and risk management. The department employees 24 full-time employees.

Program and Accessibility Issues:

- There is no process for determining whether a policy or practice modification would fundamentally alter the nature of a program or service being offered.
- The Administrative Services Department requires forms to be filled out that may or may not be available in alternative formats.
- The front office does not have TDDs/TTYs nor are the staff members trained in the use of such equipment.

Modifications in Place:

- In general, from the review of policies, the Administration Services Department has no policies or practices that could have the direct or indirect effect of excluding or limiting the participation of individuals with disabilities. (28 CFR §35.130(b)(3)).
- There is no circumstance in which a person with a disability would be asked to pay a fee or meet any other requirements not imposed on other program participants.
- Meeting accommodations are available upon request.
- Generally, public meetings are held in locations that are accessible to persons with mobility impairments. Some facilities have accessibility issues that are detailed in Part III of this report.

Recommendations to Make Programs Accessible:

- Ensure that the ADA Public Notice regarding the City's commitment to providing accessible services is posted on all City information boards and kiosks, maximizing public exposure.
- Develop and adopt a policy for staff training for providing alternative methods of completing forms for people with

disabilities that prevent them from filling out or signing forms. The policy should be based on Citywide protocol.

- The department should ensure that individuals with disabilities can obtain information about the location of accessible entrances, program sites, and other access features and special procedures for individuals with disabilities. This information should be posted and available at the front desk and bulletin boards.
- The City should develop a written policy that allows individuals with disabilities to be offered to participate as members of the planning or advisory boards.
- Publicize the availability of American Sign Language (ASL) interpreters in all meeting announcements.
- Maintain a list of on-call American Sign Language Interpreters to assist with individuals with hearing impairments.
- Continue to display a notice on meeting agendas indicating the availability of accessibility modifications.
- Where appropriate or when requested, the Department should provide documents and publications such as large print, Braille, audiotape, computer disk, pictorial signage, etc. for individuals with disabilities. Where appropriate or when requested, the Department should also provide documents and publications in simple, easy-to-understand language for individuals with learning disabilities.
- Materials need to be displayed in departments and areas that are accessible for individuals with disabilities. (28 CFR §35.163(b)).
- The procedure for filing a disability discrimination complaint is not publicized.

2.3.2 City Clerk's Office

The City Clerk's office maintains the City's records management system as well as the legislative history of the City including the municipal code. The department also conducts municipal elections and is the official record keeper for the City, codifies ordinances, resolutions and contracts. The office maintains rosters, agendas, minutes and oaths for all employees, City boards, committees, and commissions.

Program and Accessibility Issues:

- There is no process for determining whether a policy or practice modification would fundamentally alter the nature of a program or service being offered.
- There is no formal staff training provided regarding the department's obligations and policies.
- Documents and publications are not readily available in alternative formats for the visually impaired.
- The procedure for filing a disability discrimination complaint is not publicized.
- The Department requires forms to be filled out that may or may not be available in alternative formats.

Modifications in Place:

- Meeting accommodations are available upon request.
- Generally, public meetings are held in locations that are accessible to persons with mobility impairments. Some facilities have accessibility issues that are detailed in Part III of this report.

Recommendations to Make Programs Accessible:

- Ensure that the ADA Public Notice regarding the City's commitment to providing accessible services is posted on all City information boards and kiosks, maximizing public exposure.
- Develop and adopt a policy for staff training for providing alternative methods of completing forms for people with disabilities that prevent them from filling out or signing forms. The policy should be based on Citywide protocol.
- The department should ensure that individuals with disabilities can obtain information about the location of accessible entrances, program sites, and other access features and special procedures for individuals with disabilities. This information should be posted and available at the front desk and bulletin boards.
- The City should develop a written policy that allows individuals with disabilities to be offered to participate as members of the planning or advisory boards.
- Publicize the availability of American Sign Language (ASL) interpreters in all meeting announcements.

- Maintain a list of on-call American Sign Language Interpreters to assist with individuals with hearing impairments.
- Continue to display a notice on meeting agendas indicating the availability of accessibility modifications.
- Where appropriate or when requested, the Department should provide documents and publications such as large print, Braille, audiotape, computer disk, pictorial signage, etc. for individuals with disabilities. Where appropriate or when requested, the Department should also provide documents and publications in simple, easy-to-understand language for individuals with learning disabilities.
- Materials need to be displayed in departments and areas that are accessible for individuals with disabilities. (28 CFR §35.163(b)).

2.3.2 City Council and City Manager

The City Manager's office provides oversight and direction to all City programs to ensure that they meet the needs of the community and respond to City Council goals. The City Manager is the chief advisor to the City Council. Although there are no formal programs or activities provided by the office, City Council and City Manager serve the public through answering questions, giving directions, and attending meetings.

Program and Accessibility Issues:

- There is no process for determining whether a policy or practice modification would fundamentally alter the nature of a program or service being offered.
- The City Council and City Manager Office does not have a written policy allowing individuals with disabilities to be offered the opportunity to participate as members of planning or advisory boards.
- The procedure for filing a disability discrimination complaint is not publicized.

Modifications in Place:

- Meeting accommodations are available upon request.
- Generally, public meetings are held in locations that are accessible to persons with mobility impairments. Some facilities have accessibility issues that are detailed in Part III of this report.

Recommendations to Make Programs Accessible:

- Ensure that the ADA Public Notice regarding the City's commitment to providing accessible services is posted on all City information boards and kiosks, maximizing public exposure.
- Develop and adopt a policy for staff training for providing alternative methods of completing forms for people with disabilities that prevent them from filling out or signing forms. The policy should be based on Citywide protocol.
- The department should ensure that individuals with disabilities can obtain information about the location of accessible entrances, program sites, and other access features and special procedures for individuals with disabilities. This information should be posted and available at the front desk and bulletin boards.
- The City should develop a written policy that allows individuals with disabilities to be offered to participate as members of the planning or advisory boards.
- Publicize the availability of American Sign Language (ASL) interpreters in all meeting announcements.
- Maintain a list of on-call American Sign Language Interpreters to assist with individuals with hearing impairments.
- Continue to display a notice on meeting agendas indicating the availability of accessibility modifications.
- Where appropriate or when requested, the Department should provide documents and publications such as large print, Braille, audiotape, computer disk, pictorial signage, etc. for individuals with disabilities. Where appropriate or when requested, the Department should also provide documents and publications in simple, easy-to-understand language for individuals with learning disabilities.

2.3.1 Community Development

The Community Development Department consist of Building & Safety, Code Enforcement, Economic Development, Housing Authority and Planning. These divisions works closely together to provide a comprehensive approach to planning for the future of the City of South Gate. The comprehensive goal of the Community Development Department is to ensure that all development in the City is consistent with the Municipal and Building Codes, General Plan, Zoning Ordinance, Housing Element and 5-Year Consolidated Plan.

The department provides the following services to the public: planning and development assistance, business resources, building and construction permits, code enforcement, Section 8 Housing Assistance, Affordable Housing Projects, Homelessness Prevention Programs, Home Improvement Loan Programs, and Community Development Block Grant Program.

Program and Accessibility Issues:

- There is no process for determining whether a policy or practice modification would fundamentally alter the nature of a program or service being offered.
- The Community Development Department requires forms to be filled out that may or may not be available in alternative formats.
- There is no formal staff training provided regarding the department's obligations and polices towards persons with disabilities.
- Documents and publications are not readily available in alternative formats for the visually impaired.
- The procedure for filing a disability discrimination complaint is not publicized.

Modifications in Place:

- In general, from the review of policies, the Community Development Department has no policies or practices that could have the direct or indirect effect of excluding or limiting the participation of individuals with disabilities. (28 CFR §35.130(b)(3)).
- There is no circumstance in which a person with a disability would be asked to pay a fee or meet any other requirements not imposed on other program participants.

Recommendations to Make Programs Accessible:

- Ensure that the ADA Public Notice regarding the City's commitment to providing accessible services is posted on all City information boards and kiosks, maximizing public exposure.
- The Department should review current zoning policies to evaluate implications for people with disabilities.
- Materials need to be displayed in departments and areas that are accessible for individuals with disabilities. (28 CFR §35.163(b)).

2.3.2 Public Works

The Public Works department oversees the City's infrastructure. They are responsible for building and maintaining all public streets, sidewalks, catch basins, street trees, sewers, and water facilities. In addition, the Department coordinates and manages the collection and recycling of refuse through Waste Management, sweeps public streets, landscapes the public right-of-way, trims trees, and removes graffiti.

Program and Accessibility Issues:

- There is no process for determining whether a policy or practice modification would fundamentally alter the nature of a program or service being offered.
- The Public Works Department does not have a process for responding to requests for modifications.
- The Public Works Department requires forms to be filled out that may or may not be available in alternative formats.
- The Public Works Department does not have a policy of notifying the public that they are prepared to make reasonable modifications to programs or services to make them accessible to people with disabilities.
- The Public Works Department does not advertise the accessibility of facilities.
- The Public Works Department does not have publicized information about the right of people with disabilities to participate in resolving a complaint or violation.

Modifications in Place:

- In general, from the review of policies, the Public Works Department has no policies or practices that could have the direct or indirect effect of excluding or limiting the participation of individuals with disabilities. (28 CFR §35.130(b)(3)).
- There is no circumstance in which a person with a disability would be asked to pay a fee or meet any other requirements not imposed on other program participants.

Recommendations to Make Programs Accessible:

- The department should ensure that individuals with disabilities can obtain information about the location of accessible entrances, program sites, and other access features and special procedures for individuals with disabilities. This information should be posted and available at the front desk and bulletin boards.
- Develop and adopt a policy for staff training for providing alternative methods of completing forms for people with disabilities. The policy should be based on Citywide protocol.
- The Public works Department should develop a process for determining whether a policy or practice modification would fundamentally alter the nature of the program or service being offered.
- The Public Works Department should provide alternative methods of completing forms for people with disabilities that prevent them from filing out or signing forms.
- The Public Works Department should develop a process where upon receipt of request for modification or assistance, the request will be elevated by the Department Head and ADA coordinator to determine the feasibility of providing the modification or accommodation. This process would be based on the Citywide Grievance Procedure.
- The Public Works Department should develop a policy of notifying the public that they are prepared to make reasonable modifications to programs or services to make them accessible to people with disabilities.

- The Public Works Department should ensure that individuals with disabilities can obtain information about the location of accessible entrances, program sites, and other access features and special procedures for individuals with disabilities. This information should be posted and available at the front desk and bulletin boards.
- The Public Works Department should publicize information about how and with whom to file a disability discrimination complaint.

2.3.3 Police Department

The Police Department provides public safety and law enforcement service for the City of South Gate. Police officers and law enforcement personnel have always interacted with persons with disability, and the ADA may mean few changes in the way to respond to the disabled. The ADA affects almost everything that officers and deputies do, for example, receiving citizen complaints, interrogating witnesses, making arrests, holding suspects, operating telephone (911) emergency centers, providing emergency medical services, and enforcing laws.

Refer to the barrier facility reports for physical barriers to this building.

Program and Accessibility Issues:

- There is no process for determining whether a policy or practice modification would fundamentally alter the nature of a program or service being offered.
- There are circumstances that members of the public are required to complete written forms.
- There are no consistent Awareness and Training to help law enforcement personnel be equipped in treating and interacting with individuals with disabilities on the job.
- The Police Department do not have an established process for responding to requests for modification. (28 CFR §35.130(b)(7)).
- There are no special procedures to make transportation to facilities accessible to persons with visual, hearing, or learning disabilities.

Modifications in Place:

- In general, from the review of policies, the Police Department has no policies or practices that could have the direct or indirect effect of excluding or limiting the participation of individuals with disabilities. (28 CFR §35.130(b)(3)).
- There is no circumstance in which a person with a disability would be asked to pay a fee or meet any other requirements not imposed on other program participants.

Recommendations to Make Programs Accessible:

- Provide alternative methods of filling out forms, as developed Citywide, for people with disabilities that prevent them from filling out or signing forms.
- Provide Awareness and Training sessions to equip law enforcement personnel in interacting with individuals with disabilities on the job. Refer to the document published by the Department of Justice titled – Commonly Asked Questions about the ADA and Law Enforcement in Appendix L.

Topics could include:

- Interacting with People with different types of disabilities
 - Responding to People who demonstrate threatening behavior due to disability
 - Procedures to arrest and transport a person who used a wheelchair
 - Effective Communication with individuals who are blind
- The Police Department should establish (or maintain the existing) TDD/TTY for their 911 Emergency Service and ensure that the dispatchers are trained in the use of the equipment or other means of communication over the telephone with a person with hearing or speech disabilities.
 - The Police Department should develop a process where upon receipt of request for modification or assistance, the request will be elevated by the Department Head and ADA coordinator to determine the feasibility of providing the modification or accommodation. This process would be based on the Citywide Grievance Procedure.
 - The Police Department should develop procedures and conduct training to staff for programs/services that provide appropriate transportation for any person who has been arrested and has a disability that precludes them from being transported in a safe manner in a patrol unit. For those individuals and for individuals with disabilities who have been injured and must be transported by ambulance, care will be taken, whenever possible, to transport equipment and service animals used by persons with disabilities for access and/or

communication, taking into consideration the safety of the suspect, citizens in general, and the police officers. When transport with the disabled individual is not possible, transport of the equipment and/or service animal to the individual's destination will be made, if possible. If this is not possible, emergency personnel will contact an appropriate resource to secure and/or care for the equipment and/or service animal.

- For jails, detention and correctional facilities, and community correctional facilities (28 CFR §35.152), if the facility is inaccessible or unusable by individuals with disabilities, public entities shall ensure that qualified inmates or detainees with disabilities shall not be excluded from participation or be denied benefits, services, programs, or activities or be subjected to discrimination.
- There were various physical barriers noted as referenced in the facilities barrier report for the Police Department building. If a policy can be created where persons in wheelchairs are sent directly to county facilities for initial processing, these physical barriers do not have to be removed.

2.3.4 Parks and Recreation

The Parks and Recreation department's mission is to acquire, develop, operate and maintain a parks and recreation system, which enriches the life for residents and visitors alike, and preserves it for future generations. The department runs the recreational facilities, pool and parks, as well as youth and adult recreational programs, classes, sports and special events.

Refer to the facilities barrier report for the physical barriers at the various recreational facilities.

Program and Accessibility Issues:

- There is no process for determining whether a policy or practice modification would fundamentally alter the nature of a program or service being offered.
- As part of the Recreation Department services, members of the public, applicants, etc. are required to complete written forms.

Modifications in Place:

- In general, from the review of policies, the Recreation Department has no policies or practices that could have the direct or indirect effect of excluding or limiting the participation of individuals with disabilities. (28 CFR §35.130(b)(3)).
- There is no circumstance in which a person with a disability would be asked to pay a fee or meet any other requirements not imposed on other program participants.

Recommendations to Make Programs Accessible:

- Ensure that the ADA Public Notice regarding the City's commitment to providing accessible services continue to be posted on all City information boards and kiosks that will maximize public exposure.
- Develop a policy for determining if the various elements of special events, classes and programs are accessible to persons with disabilities.
- The Recreation Department should have a policy and have staff training to provide alternative methods of completing forms for people with disabilities that prevent them from filling out or signing forms. The policy should be based on Citywide protocol.
- The department should ensure that people with disabilities can obtain information about the location of accessible entrances, program sites, and other access features and special procedures for individuals with disabilities. This information should be posted and available at the front desk and bulletin boards.
- The City is not required to provide instructors or trainers with special training or certifications. The Recreation Department should develop a reasonable accommodation policy in conjunction with the City wide protocols that includes a liability policy. For example, if a person with a disability would like to participate in a swimming lesson class with their own trainer or guardian; the City should have a policy and waiver to allow for participation.
- The Recreation Department should develop a written policy based on Citywide policy describing accessibility requirements for programs that provide transportation.

- The Recreation Department should develop a written policy and checklist for special events to include items such as:
 - Ensure there is adequate number of accessible parking spaces at the venue of the event.
 - Ensure that the path of travel from the parking or public transportation is barrier free.
 - Ensure that the path of travel goes to all vendors, events, attractions, and services. Do they have to go on the grass?
 - Ensure that all vendors provide the appropriate counter heights, etc.
 - Ensure there sufficient accessible porta-potties and/or restrooms available.
 - Ensure there are water fountains that are accessible (Hi/Lo).
 - If there is a concert, ensure there are sufficient accessible seating uniformly spaced throughout the event.

PART 3 – TRANSITION PLAN

3.1 Overview

This Transition Plan, in summary, is a list of physical barriers that need to be removed and a timeline for barrier removal. **It is included as Volume 2 and Volume 3 of this report.** It includes a review of physical barriers of sites for compliance with the California Code of Regulations, Title 24, Part 2 (the California Building Code), and the ADA Standards for Accessible Design, (which is composed of the 28 CFR part 35.151 and the Americans with Disabilities Accessibility Guidelines) and a barrier removal schedule. The specific requirements for preparation of an acceptable Transition Plan are described in 28 CFR §35.150(d)(3). This plan includes:

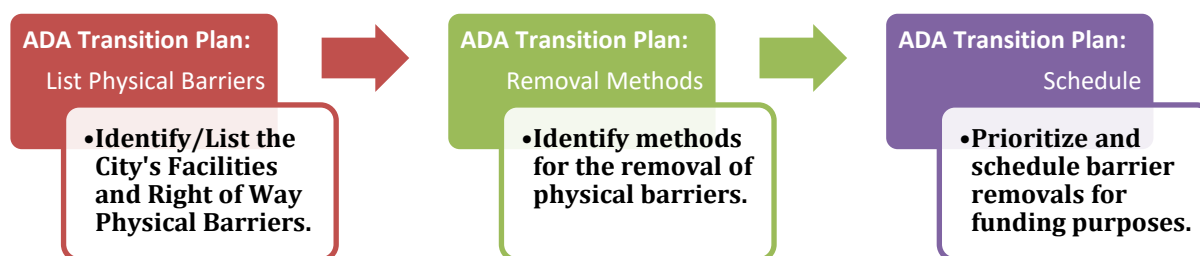


Figure 2: Components of ADA Transition Plan

- A list of the physical barriers in the City's 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 make the facilities accessible;
- A schedule for taking the steps necessary to achieve compliance with the ADA, Title II; and
- The name of the individual responsible for the plan's implementation.

Although California has adopted most of the Federal ADA requirements, there are some differences. In general, the more

restrictive requirements (whether federal or state) should be applied when designing accessible facilities. Title 24 was incorporated in the evaluation of architectural barriers as part of the Transition Plan.

Per CBC 11B-202.4, when alterations or additions are made to existing buildings or facilities, an accessible path of travel to the specific area of alteration shall be provided. The primary accessible path of travel shall include a primary entrance to the building, toilet and bath facilities serving the area, drinking fountains, public telephones serving the area and signs.

An alteration is defined as a change to a building that could affect usability, including remodeling, renovation, rehabilitation, historic restoration, resurfacing of circulation path or vehicular ways, plan configuration of walls, changes or rearrangement of structural parts, and changes or rearrangements of full-height partitions. Alterations do not include normal maintenance, reroofing, painting, or changes to mechanical or electrical systems.

When the adjusted construction cost is less than or equal to the current valuation threshold, the cost of compliance with 11B-202.4 shall be limited to 20 percent the adjusted cost of alterations. When the full compliance with Section 11B-202.4 would exceed 20%, compliance shall be provided to the greatest extent possible without exceed 20 percent.

This code requirement can be met in conjunction with the proposed 10-year transition plan. Many of the physical barriers (both at the facilities and the public right of way) found and their associated costs can be scheduled as part of the path of travel requirement due to alteration of facilities, or may already be planned for in City Capital Improvement Program, or pavement maintenance projects.

Refer to Volumes 2 and 3 which contain the list of physical barriers in facilities and public right of way. These are also provided to the City of South Gate as a software database, which shall be used to sort through and check off items as they are corrected.

3.2 Facilities ADA Barrier Removal

3.2.1 Overview

The estimates for physical (architectural) barrier removal noted in Volume 2 are based on feasibility study level cost estimates. Data on construction project costs from an industry standard database was used to calculate the costs. The cost estimates generally assume favorable facility conditions for the upgrade without complications, known conditions, or impacts to adjoining improvements. The estimates are accurate enough to determine the magnitude of city-wide needs, but not precise enough to ensure specific facility upgrades. Recognizing that the City has limited funds and cannot immediately make all buildings and facilities fully accessible, City staff utilizes the following criteria as the basis for prioritizing the high, medium and low removal of architectural barriers:

- Is there an immediate or advanced need for programmatic access?
- Are the programs offered at one facility available at alternative, accessible locations?

Are accessible services distributed throughout the city to create maximum access for all residents?

Please note these additional comments regarding the following facilities.

Courthouse: The Courthouse Building was closed in 2004 and is out of service and unoccupied. The facility has multiple ADA barriers and code deficiencies. Our field assessors conducted a visual survey and concluded that a retrofit of the ADA elements is not sufficient as a stand-alone retrofit since a full assessment of architectural, ADA, seismic and other Title 24 upgrades will need to be performed when and if the decision is made to open the facility for use.

Golf Course: The obligation of the City to provide accessible golf as a city program is much higher as a Title II entity than that of a privately owned golf course under Title III. In evaluating the policies and procedures implemented at the course, there are barriers to entry for customers with disabilities seeking to play the course. The current “No Carts” policy must be reviewed and revised to include “accessible” carts. The greens of the course are highly susceptible to costly damage by cart travel, however, newer “greens friendly” mobility devices with wide wheels reduce the PSI (pounds of square inch of pressure) of some of these single rider golf carts on the greens surface and is often less than the human

footprint and less than that applied by motorized moving equipment. It is recommended that the City invests in at least two accessible carts.

The Waterworks Facilities (3 reservoirs, 2 elevated tanks, and 11 water wells) qualify under the general exceptions of the ADA per CBC 11B-203.5 Machinery Spaces and therefore does not require accessible access. These facilities are frequented only by service personnel for maintenance, repair or occasional monitoring of equipment and shall not be required to comply with these requirements or to be on an accessible route.

Solid Waste Transfer Facility has no buildings on site and the only means of access between various spaces on site is a vehicular way not providing pedestrian access. Therefore, per exception CBC 11B-206.2.2, an accessible route is not be required on site.

Owen Group surveyors assessed the following facilities:

Boy Scout Camp	Police Department
Civic Center	Sports Center
City Hall Exterior	Swim Stadium
City Hall	Westside Resource Center
Court House	Cesar Chavez Park
City Yard (Field Operations)	Circle Park
Golf Course	Hollydale Community Park
Girls Club House	Hollydale Regional Park
Gardendale Tot Lot	South Gate Park
Hollydale Resource Center	Stanford Park
Municipal Auditorium	State Street Park
Margaret Travis Senior Center	Triangle Park

3.2.1 Facilities Priorities

Because the City of South Gate has a large number of facilities, it is impossible to immediately renovate all facilities that create barriers to program access, barriers to facilities will be removed systematically. This Transition Plan includes a 10-year budgeting plan that implements the barrier removal.

Facilities targeted in Phase One will become a high priority for capital improvement funding.

The responsibility for ensuring the barrier removal will reside with the City Manager and the ADA Coordinator.

Level 1: High Visibility / High Use Items

Level One priorities are assigned to immediate features that significantly affect access to facilities. For example:

Pedestrian Access Routes:

- Tripping Hazards
- Overhead Clearance Obstacles
- Loose Debris Impeding Access Routes
- Detectability issues

Facilities:

- Entry walks and doors
- Handrail Modifications
- Signs indicating accessible entrances
- Overhead Obstacles
- Accessible Parking Stalls

Level 2: Barriers That Pose Obstacles to Access Routes and Hinder Access to Programs.

Level Two priorities are those features that create obstacles to both roadside and facility pedestrian access routes. Also included are barriers to programs, activities, and services provided by the City. For example:

Pedestrian Access Routes:

- Driveway Landings
- Impediments to Access route width

Facility Access:

- Conference rooms, classrooms, program areas. The most frequently used and highest volume rooms as Level Two priorities. Duplicate rooms or features are prioritized at a lower level).
- Primary doors into program areas.
- Braille and tactile signage.
- Assistive-listening devices.
- Public restrooms.
- Showers and locker rooms associated with swimming programs.
- Transaction counters where information is offered, bills are paid, etc.

Level 3: Minor Access and Amenity Barriers.

Level Three priorities are those features that are not immediately preventing passage but provide hardship to the impaired. Also included are features that do not directly affect access to programs, activities, and services provided by the City. For example:

Pedestrian Access routes:

- Cracked cement slabs.

Facility Access Routes:

- Doors that pose little obstacle to program access.
- Vending machines, drinking fountains, light switches, electrical outlets, and storage rooms in program areas.

3.3 Right of Way ADA Barrier Removal

3.3.1 Overview

Volume 3 includes a review of physical barriers of sidewalks, street crossings, and other elements in the public right-of-way can pose challenges to accessibility. The California Code of Regulations, Title 24, Part 2 (the California Building Code), and the ADA Standards for Accessible Design, (which is composed of the 28 CFR part 35.151 and the Americans with Disabilities Accessibility Guidelines) focus mainly on facilities on sites; however, the Public Right-of-Way Accessibility Guidelines (PROWAG) addresses items in the public right-of-way.

The purpose of this assessment is to provide the City of South Gate an overview of the various accessibility issues presently found. The code does not require a public agency to implement all changes to meet the technical requirements of the code, but does require this assessment and a plan to remove these barriers. In terms of removing barriers to accessibility in the public right of way, the following is the recommended prioritization of projects.

Please note that while the ADA code requires sidewalk cross slopes to be less than 2%, the assessment of the City of South Gate sidewalks has found that over 80% of City sidewalks fall into the range of 2%-5% cross slope. It would be economically infeasible to try to update all sidewalks in this category in Priority 1. Therefore, In order to implement a logical and economically feasible plan for reaching code compliance, and to implement maximum safety considerations, Owen has placed sidewalks with serve cross slopes of greater than 5% in Priority 1, and sidewalks with a cross slope in the 2-4.9% range in Priority 2.

3.3.2 Methodology

Common barriers to PROWAG (Pedestrian Right-of-Way Accessibility Guidelines) surveyed by Owen Group field teams are as follows:

A. Sidewalk Cross Slope

Sidewalk cross slope is the primary barrier to pedestrian path-of-travel. California Building Code maintains that a pedestrian path-of-travel must be level, with a firm and slip resistant surface. The term “level” refers to the cross slope (the slope perpendicular to the path-of-travel) of the sidewalk route. There is an allowable 2.0% tolerance. Studies have shown that

ongoing cross slopes that exceed the 2.0% barrier can become cumbersome to wheel-chair bound persons. Sustained cross slope makes it difficult to maintain the path-of-travel.

Owen Group surveyors utilize 2 ft laser levels to measure and record cross slope changes. GPS coordinates are recorded every time the cross slope changes between three (3) categories: 0-2%, 2-5% and +5%. Pictures are NOT taken for changes in cross slope.

B. Tree Roots

Tree roots tend to grow under sidewalk access routes and push the concrete slabs, creating vertical displacements that prevent access to wheelchairs and/or can cause tripping hazards to those who are visually impaired. Additionally, roots can lift one side of the sidewalk, creating a cross slope barrier that exceeds 2.0% and create a vertical displacement.

Owen Group surveyors record each instance of tree roots affecting the path of travel. GPS coordinates are recorded at every occurrence where a tree currently impairs the path of travel or will become a future issue. Pictures are taken for each occurrence.



C. Vertical Displacements (Tripping Hazards)

Vertical displacements in the path of travel can impede the access routes. Not only are they difficult for wheelchair bound citizens to push their wheels over but they can form tripping hazards for the visually impaired and the average pedestrian. Vertical displacements are compliant up to ¼ inch. From ¼ inch to ½ inch bevelment is allowed up to 50% grade. Any vertical displacement, greater than ½ inch, is noncompliant.

Owen group surveyors use a standard tape measure to record the height of all vertical displacements in the path of travel. Any lip greater than ¼ inch is recorded regardless of compliant bevelment. Vertical lifts greater than 1 inch are given a priority

of 1 (1 being the highest priority reserved for safety issues) as these are tripping hazards and can compromise the safety of pedestrians and potentially lead to lawsuit. Pictures are taken for every vertical displacement occurrence.

D. Curb ramps

Curb Ramps are a very common barrier to access. If the slope is too steep, it can be impassable to those who are wheelchair bound. Similarly, there must be a landing area at the top of the ramp that is level (Cross Slope and Running Slope less than 2.0% grade) firm and slip resistant that is minimum 4 ft x 4 ft. Additionally the ramp must maintain a width of 4 ft wide to allow the full width of a wheelchair to pass. Another common element that is not found on older ramps is the lack of a visually contrasting truncated dome mat. These are used for visually impaired detection of a surface transition between the sidewalk and the street.

Owen Group surveyors record every curb ramp occurrence and analyze its compliance. Compliance is determined by top landing width, running slope, cross slope, gutter slope, truncated domes and ramp width. Pictures are taken for each curb ramp.

E. Bus Stops

Transportation facilities are also covered under the ADA. People with disabilities must be allowed to board at the same location as others, and with the bus boarding area complying for the following requirements.

- Surface must be firm, stable, and slip resistant.
- A 96" by 60" (8' by 5') minimum clear space at the bus boarding area. The clear floor space must be oriented so that the 96" dimension is perpendicular to the curb and is at 2% or less slope. The 60" dimension may be the same slope as the street.
- An accessible route connecting the bus boarding area to the sidewalk / street.
- Bus Shelters shall have a minimum 48" by 30" clear space located entirely within the shelter.

F. Driveway

Driveways present another commonly found barrier to the path-of-travel. California Building Code states that the cross slope of an access route must not exceed 2.0% grade. If a driveway crosses the path of travel there must remain a minimum access width of 4 ft with a grade of less than 2.0% cross slope.

Owen Group surveyors record each occurrence of a noncompliant driveway. If driveways have a slope greater than 2% grade and is the only path in the pedestrian right-of-way than it is noncompliant. Essentially, a level passing lane must be provided for the entire length of the driveway. Pictures are taken for each noncompliant occurrence.

Compliant Example:



Noncompliant example:



G. General Obstructions

Another common barrier to pedestrian access is general obstructions to the minimum 4 ft wide access path. To allow the full width of a wheelchair to travel a pedestrian access route, the California Building Code states that a minimum 4 ft wide and 80 inch high access path must be maintained. This can be obstructed by overgrown foliage, utility poles, fire hydrants, traffic signs and signals, and various other permanent and temporary objects.

Owen Group surveyors record each occurrence of an object (whether temporary or permanent) that impedes the required minimum access route width of 4 ft. Common occurrences include but are not limited to Fire Hydrants, Utility Poles, Traffic Signs, Parked Cars, Tension Cables, Street Lamp Posts, and Utility Control Boxes. Pictures are taken for each occurrence.

3.3.3 Right of Way Priorities

Barriers were assigned levels of priority using the following criteria:

Phase 1 (Highest Priority): Based on Requests, Severity, and Location

- **Requests from Qualified persons with disabilities.** Generally, requests come from residents with disabilities who wish to get to and from their home or work place to transportation, school, medical facilities or other areas to accommodate their activities of daily living. The City will evaluate requests and proceed with necessary improvements to ensure access.
- **Curb Ramps** on Major Streets.
- **Vertical Displacements** on Major Streets.
- **Obstructions less than 4' clear** on Major Streets.
- **Sidewalks with greater than 5% cross slopes** on Major Streets, Collectors, and Residential Streets.
- **Traffic Signals** with high pedestrian use.
- **Bus Stops and Shelters** in high bus use / pedestrian areas.

Phase 2 (Medium Priority): Based on Medium Severity obstructions and Location

- **Vertical Displacements** on collectors and residential streets.
- **Driveways** on Major Streets.
- **Traffic Signals and Bus Stops** not in Phase 1.
- **Obstructions less than 4' clear** on collectors and residential streets.
- **Sidewalks with 2%-4.9% cross slopes** on Major Streets, Collectors, and Residential Streets.

Phase 3 (Third Priority):

- **Within the City right-of-way** locations that do not fall into any of the above groups.
- **Tripping Hazards** on collectors and residential streets.

3.4 Phasing and Expenditure Plan

This section outlines a plan to implement the City of South Gate’s ADA Barrier Removal. The projected schedule is based on a realistic estimate of the funding availability and timing for design and permitting. Some lower priority items are scheduled for the near term because they require little planning and can be achieved with minimal costs and can be completed by City staff. In Volume 2, these barriers are tagged as Maintenance items. Some of the higher priority items are scheduled further out because of the planning and design requirements (Contractor Tag); additionally an entire facility can be upgraded at one time and would address all items at once.

The projected schedule is based on a realistic estimate of the funding availability and timing for design and permitting. Some lower priority items are scheduled for the near term because they require little planning and can be achieved with minimal costs and can be completed by City staff. In Appendix B (Facility Assessment Reports) these barriers are tagged as Maintenance items. Some of the higher priority items are scheduled further out because of the planning and design requirements (Contractor Tag); additionally an entire facility can be upgraded at one time and would address all items at once.

Estimate costs are based on information obtained from several industry accepted data-base sources, such as R.S. Means, BNI Building News, and National Estimator. These sources are used as a basis, along with the estimator’s professional judgment, to adjust for the specific project type, location, complexity and size, and other unique or special circumstances.

All costs represented in this report reflect current-year U.S. dollars. The costs generated are built on identified deficiencies with replacement of materials or components in-kind unless industry standard requires change of material or component type.

Costs for contingency, escalation, design, construction management, engineering, permitting, inspection and similar professional services for developing the plans to remove barriers are included in the expenditure plan and estimated at 30%. Other indirect costs such as temporary space rental or costs associated with fundraising or financing are not included.

Opinions of costs of repair or replacements are approximations only and should not be interpreted as bids or offers to perform work. Actual costs can be affected by the extent of work to be done as one project, the quality of contractor, the quality of materials chosen, and the specific work conditions.

3.5 Funding for Projects

CALTRANS has published a transportation funding guidebook in August 2008 titled “State and Federal Funds Available for Local Agency Projects,”

http://www.dot.ca.gov/hq/LocalPrograms/lam/Transportation_Funding_Guidebook.pdf

This document provides concise, high-level overviews of several Federal and State transportation funding programs available to local agencies. Each program description contains key facts about eligibility, project selection, significant dates, references, sources for assistance and other essential information.

The Community Development Block Grant (CDBG) program, administered by U.S. Housing and Urban Development (HUD), is a flexible program that provides communities with resources to address a wide range of unique community development needs.

3.6 Historical Structures

The law does not require modifications that would threaten or destroy a historic property (28 CFR §35.150(a)(2)). However, alterations to historic properties shall comply with section 4.1.7 of ADAAG (28 CFR §35.150(b)(3)). If it is not feasible to provide physical access to a historic property in a manner that will not threaten or destroy the historic significance of the building or facility, alternative methods shall be provided.

During the design process, the design team should determine if the required improvements meet the thresholds of the ADA codes for historical structures.

The facilities in the City of South Gate are not considered historical.

PART 4 – ADA TOOLKIT

4.1 Guidelines

Although not mandated by the law, keeping resources and guidelines current to existing codes is important to meeting the code requirements.

Recommendation:

In order to facilitate access to all City Programs and Departments, the City should maintain these program accessibility guidelines, standards and resources. This information should be made available to all employees, volunteers, and contractors. The City should maintain and update these guidelines as necessary to address its needs. Revisions should include information and technological devices that help employees and contractors communicate with individuals with a variety of disabilities. The City should periodically review the components of this section, as new technologies are developed in order to ensure that the best types of modifications are included.

Federal guidelines and standards and the CBC are periodically updated (CBC is normally every three years). These periodic revisions are based on research findings and guidance from advisory committees. Therefore, the City should have an ongoing program of regularly reviewing code changes and updating policies and procedures related to accessibility. The program should include a regular practice of reviewing research materials posted to the U.S. Access Board's website and updating local guidelines and practices as new standards are adopted or existing standards are revised.

A guide to disabilities and disability etiquette is provided in Appendix H. It should be distributed to employees, volunteers and contractors in addition to employee training. The guide helps ensure that employees and contractors 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. These guides are periodically updated, so the City should periodically check to ensure that the current guide is available. There are many websites that have this information easily available. The City may also want to consider developing their own etiquette guide.

4.2 List of ADA Resources

Federal Accessibility Standards and Regulations	
U.S. Department of Justice http://www.ada.gov	
ADA Regulation for Title II https://www.ada.gov/2010_regs.htm	Title II of the ADA protects qualified individuals with disabilities from discrimination on the basis of disability in the services, programs, or activities of all state and local governments.
Title II Technical Assistance Manual (1993) and Yearly Supplements http://www.ada.gov/taman2.html http://www.ada.gov/taman2up.html	This manual explains what state and local governments must do to ensure that their services, programs, and activities are provided to the public in a nondiscriminatory manner.
Americans with Disabilities Act of 1990 http://www.ada.gov/pubs/adastatute08.pdf	This link is the current text of the ADA statute including changes made by the ADA Amendments Act of 2008 (P.L. 110-325)
ADA Information for Law Enforcement http://www.ada.gov/policeinfo.htm	These compliance assistance materials will help state and local law enforcement officers understand how to interact with victims, witnesses, suspects, and others who have disabilities.
ADA Best Practices Tool Kit for State and Local Governments http://www.ada.gov/pcatoolkit/toolkitmain.htm	This Tool Kit provides an overview of ADA compliance issues for state and local governments. The Tool Kit is a helpful supplement to – not a replacement for – the regulations and technical assistance materials that provide more extensive discussions of ADA requirements.
US Access Board http://www.access-board.gov/	
<ul style="list-style-type: none"> • The Access Board is responsible for developing and updating design guidelines known as the ADA Accessibility Guidelines (ADAAG). 	
ADA Accessibility Guidelines (ADAAG) http://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-ada-standards/background/adaag	<ul style="list-style-type: none"> • This document contains scoping and technical requirements for accessibility to buildings and facilities. • This document must be used in conjunction with Title 24 of the California Building Code
Section 508 Standards for Electronic and Information Technology	http://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-section-508-standards/section-508-standards
Telecommunications Act Section 255 Guidelines	http://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-telecommunications-act-guidelines
State of California Accessibility Standards and Regulations	
Title 24, California Building Code http://www.iccsafe.org	<ul style="list-style-type: none"> • The complete Title 24 or any of its parts is available for purchase from the International Code Council (ICC). • Although California has adopted most of the ADAAG requirements, there are some differences. In general, the more restrictive requirements should be applied.

Division of the State Architect (DSA) http://www.dgs.ca.gov/dsa/Programs/progAccess.aspx	
California Access Compliance Reference Materials http://www.dgs.ca.gov/dsa/programs/progaccess/accessmanual.aspx	<ul style="list-style-type: none"> ▶ DSA has prepared several documents to help code users understand and apply the accessibility provisions. ▶ These documents clarify obligations and code requirements under the CBC, and provide background and context for accessibility issues.
State & National Organizations who Provide Disability Services and Information	
Pacific ADA Center http://www.adapacific.org/	The Pacific ADA Center is one of ten Regional centers nationally that have been set up to provide information and referral, training, consultation, and technical assistance to the business, state and local government, and disability communities
Disability.gov https://www.disability.gov/	The U.S. federal government website with one-stop interagency portal for information on disability programs and services nationwide.
California Department of Developmental Services (DDS) http://www.dds.ca.gov/DDSHomePage.cfm	The California Department of Developmental Services is the agency through which the State of California provides services and supports to individuals with developmental disabilities.
United Cerebral Palsy of Los Angeles, Ventura and Santa Barbara Counties http://www.ucpla.org/	Nonprofit direct care provider of services in Southern California for persons with cerebral palsy, autism, Down syndrome and other developmental disabilities. Programs include adaptive services, assistive technology services, summer programs, life skills training, and a center for arts and technology.
AbleData http://www.abledata.com	The National Institute on Disability and Rehabilitation Research of the U.S. Department of Education maintains a national web based service, which provides up-to-date links to assistive technologies and disability related resources.
Disability Resources, Inc. http://www.disabilityresources.org	A national nonprofit organization that provides information about resources for independent living. DRI maintains an on-line directory of assistive technology resources.
Independent Living Research Utilization http://www.ilru.org/	The ILRU (Independent Living Research Utilization) program is a national center for information, training, research, and technical assistance in independent living.
World Institute on Disabilities (WID) http://wid.org/	WID maintains a comprehensive list of accessible technology resources. http://wid.org/resources
Center for Accessible Technology (CforAT) http://www.cforat.org/	CforAT's focus is on access to computers and technology for people with disabilities
BuyAccessible Wizard Tool http://www.buyaccessible.gov/	For projects that require agencies to meet Section 508 requirements, the BuyAccessible Wizard is a web-based application that guides users through a process of gathering data and providing information about Electronic and Information Technology (EIT) and Section 508 compliance.
AAPD http://www.aapd.com/	The American Association of People with Disabilities (AAPD) is the nation's largest disability rights organization.

<p>National Organization on Disability (NOD) http://www.nod.org/</p>	<p>The National Organization on Disability (NOD) is a private, non-profit organization. NOD focuses on increasing employment opportunities for the 79 percent of working-age Americans with disabilities who are not employed.</p>
<p>National Center for Accessible Media http://ncam.wgbh.org/</p>	<p>A non-profit R&D organization dedicated to achieving media access equality for people with disabilities.</p>
<p>National Center on Physical Activity and Disability http://www.ncpad.org</p>	<p>The Center provides information and resources on physical activity to help people with disabilities find ways to become more active and healthier.</p>
<p>Paralyzed Veterans of America (PVA) http://www.pva.org/</p>	<p>PVA is a national advocacy organization representing veterans</p>
<p>TDI http://tdiforaccess.org</p>	<p>TDI (formally known as Telecommunications for the Deaf and Hard of Hearing, Inc.) is a national advocacy organization addressing equal access issues in telecommunications and media.</p>
<p>Accessible Tech.org http://www.accessibletech.org/index.php</p>	<p>Accessible Technology in the Workplace. Website with resources for use of electronic information technology that is universally accessible.</p>
<p>Braille Institute http://www.brailleinstitute.org/</p>	<p>Braille Institute is a nonprofit organization whose mission is to eliminate barriers to a fulfilling life caused by blindness and severe sight loss.</p>
<p>State of California Department of Social Services - Office of Special Services to the Blind http://www.cdss.ca.gov/cdssweb/PG83.htm</p>	<p>Provides information and referral on services, programs, entitlements, and products of benefit to individuals who are blind or visually impaired and their families or service providers.</p>
<p>American Foundation for the Blind (AFB) http://www.afb.org</p>	<p>AFB is a national organization that seeks to remove barriers, create solutions, and expand possibilities so people with vision loss can achieve their full potential.</p>
<p>National Federation of the Blind (NFB) https://nfb.org/</p>	<p>NFB provides on-line resources for technology for the blind.</p>
<p>State of California Department of Social Services - Office for Deaf Access http://www.cdss.ca.gov/cdssweb/PG145.htm</p>	<p>Office for Deaf Access administers the Deaf Access Program (DAP) which ensures that state operated public programs address the communication needs of people who are deaf, deaf-blind, hard of hearing and late-deafened.</p>
<p>National Association of the Deaf (NAD) http://www.nad.org/</p>	<p>A national organization of, by and for deaf and hard of hearing individuals in the United States of America.</p>
<p>National Alliance on Mental Illness (NAMI) http://www.nami.org</p>	<p>NAMI is a national mental health organization dedicated to building better lives for the millions of Americans affected by mental illness. NAMI advocates for access to services, treatment, supports and research and is steadfast in its commitment to raise awareness and build a community for hope for all of those in need.</p>
<p>American Speech-Language-Hearing Association (ASHA) http://www.asha.org/</p>	<p>The American Speech-Language-Hearing Association (ASHA) is a national professional, scientific, and credentialing association.</p>
<p>Learning Ally https://www.learningally.org/</p>	<p>Learning Ally (formerly Recording for the Blind & Dyslexic (RFB&D),) is a national nonprofit with a defined approach to</p>

	help support students with learning disabilities and their families.
California State Library - The Braille and Talking Book Library , http://www.library.ca.gov/services/btbl.html	Blind and visually disable people may borrow recreational reading materials and magazines on cassette, digital cartridge, and Braille provided by the Library of Congress National Library Service for the Blind and Physically Handicapped (NLS) network.
State and National Organizations who Provide Information about Creating and Maintaining Accessible Websites	
How To Tell if Your Web site is Accessible	
HiSoftware - http://www.hisoftware.com/	HiSoftware's compliance and security solutions mitigate risk by actively monitoring content to give organizations the power to easily and more effectively enforce regulatory and corporate guidelines on public-facing websites, intranets, extranets, file shares and SharePoint sites.
HiSoftware® Cynthia Says™ Portal http://www.cynthiasays.com/	A free service for personal, non-commercial use to inform the community on what constitutes accessible web design and content.
W3C Web Accessibility Initiative - Accessibility Evaluation Resources http://www.w3.org/WAI/eval/	This is a list of resources which provide general procedures and tips for evaluation in different situations, from evaluation during Web site development to ongoing monitoring of existing sites.
Resources for Web Developers	
Accessibility of State and Local Government Websites to People with Disabilities http://www.ada.gov/websites2.htm	DOJ technical assistance document providing guidance on making state and local government websites accessible
National Center for Accessible Media http://ncam.wgbh.org/invent_build/web_multimedia/tools-guidelines	A collection of resources for developers and users interested in ways to make media accessible to people with disabilities.
Access Board Section 508 guide	http://www.access-board.gov/guidelines-and-standards/communications-and-it
Section 508 on-line accessible software development training	http://www.section508.gov/?fuseAction=Courses
ADA Pacific Center Website Accessibility Resources	http://www.adapacific.org/ait/index.php#resources

State and National Resources for Emergency Preparedness Plans*	
*Also Refer to Appendix M For Additional Resources and Links on Emergency Preparedness	
Earthquake Preparedness Guide for People with Disabilities	http://www.earthquakecountry.org/downloads/ShakeOut_Earthquake_Guide_Disabilities_AFN.pdf
United States Department of Labor Emergency Preparedness for People with Disabilities	http://www.dol.gov/odep/programs/emergency.htm
Department of Labor - Preparing the Workplace for Everyone	http://www.dol.gov/odep/programs/emergency.htm
Ready.gov http://www.ready.gov/	Guidelines for additional preparations a person with disability or an access and functional may need for emergencies. http://www.ready.gov/individuals-access-functional-needs
California Department of Development Services (DDS) Emergency Preparedness http://www.dds.ca.gov/ConsumerCorner/EmergencyPreparedness.cfm	Booklet describing emergency preparedness tools for a wide range of people and field-tested the tools to make sure that the materials could work for everyone. http://www.dds.ca.gov/consumercorner/fsbs/action_selectfile.cfm?FN=4C_FSBStory
National Center for Accessible Media http://ncam.wgbh.org/	Access to Emergency Alerts for People with Disabilities Recommendation for Accessible Emergency Notification http://ncam.wgbh.org/file_download/47
Resources for Providing Accessible Facilities and Programs	
Providing Accessible Meetings	Accessible Information Exchange: Meeting on a Level Playing Field http://www.ada.gov/business/accessiblemtg.htm
Common ADA Errors and Omissions in New Construction and Alterations	http://www.ada.gov/error.htm http://www.ada.gov/errors.pdf
ADA Checklist for Polling Places	http://www.ada.gov/votingck.htm
Access in telecommunications and media	http://tdiforaccess.org
Accessing relay services	http://www.accessibletech.org/articles/telecom/relayServices.php
Captioning Standards	http://www.accessibletech.org/articles/multimedia/captionsStandards.php
Deaf and Disabled Telecommunications Program (DDTP).	Telephone communications access for deaf and disabled Californians. http://www.ddtp.org/homepage.aspx Provides California Relay Service (CRS), and the California Telephone Access Program (CTAP)

Resources for Providing Accessible Parks and Recreation Facilities and Programs	
Access Board Recreational Guidelines	http://www.access-board.gov/guidelines-and-standards/recreation-facilities
California State Parks Accessibility Guidelines	http://www.parks.ca.gov/pages/21944/files/ca_stateparksaccessguiderev_titlepagewithdisclaimer.pdf
National Center on Accessibility http://www.ncaonline.org/	NCA has many resources regarding access issues unique to park and recreation programs and facilities including on campground accessibility, accessible picnic tables, access to beaches, and inclusion of people with disabilities in aquatic venues.
National Center on Physical Activity and Disability http://www.ncpad.org	Discover Accessible Fitness: This booklet can serve as a tool for fitness professionals to become familiar with key considerations for wheelchair users using fitness equipment and to broaden their knowledge to help more people. http://www.nchpad.org/discoverfitness/index.html
	Certified Inclusive Fitness Trainer: Certified Inclusive Fitness Trainers (CIFT) master an understanding of exercise precautions for people with disabilities, and utilize safe, effective and adapted methods of exercise training to provide exercise Recommendation. http://www.nchpad.org/fppics/CIFT.pdf
Paralyzed Veterans of America (PVA) Sports and Recreation Resources http://www.pva.org/site/c.ajlRK9NJLcJ2E/b.6349705/k.2492/Get_Sports.htm	PVA’s Sports and Recreation Program promotes a range of activities for people with disabilities, with special emphasis on activities that enhance lifetime health and fitness.
United States Association of Blind Athletes	http://www.usaba.org
United Spinal Association list of Wheelchair Recreation, Sports & Travel	http://www.usatechguide.org/articledisplay.php?artid=22&link=sports_rec
Resources for ADA Coordinators	
ADA Coordinator Certification Program	http://www.adacoordinator.org/
National Association of ADA Coordinators	http://adacoordinators.org/

Appendix A: City Programs and Public Questionnaires

Appendix G: Sample Policies and Procedures

Appendix H: Disability Etiquette

Appendix I: Web Accessibility

Appendix J: ADA Primer for State and Local Governments

Appendix K: ADA Best Practices Toolkit – Effective Communication Requirement and DOJ Statement on Effective Communication

Appendix L: Commonly Asked questions about the ADA and Law Enforcement

