City of Palo Alto (ID # 12292)

City Council Staff Report

Report Type: Consent Calendar **Meeting Date: 6/7/2021**

Summary Title: Adoption of ADA Transition Plan Update

Title: Adoption of the Americans With Disabilities Act (ADA) Transition Plan Update for City Buildings, Parking Facilities, Parks, and Public Right-of-Way Sidewalks and Curb Ramps

From: City Manager

Lead Department: Public Works

Recommendation

The Policy and Services Committee and Staff recommend that Council adopt the Americans with Disabilities Act (ADA) Transition Plan Update.

Executive Summary

On May 11, 2021, the Policy and Services Committee unanimously recommended Council adoption of the ADA Transition Plan Update. The Americans with Disabilities Act (ADA) is a comprehensive law addressing both employment and the provision of goods and services to persons with disabilities. The ADA addresses all aspects of accessibility including public accommodations in facilities, as well as policies, procedures, and website accessibility. It is the policy of the City of Palo Alto to offer its public programs, services, and meetings in a manner readily accessible to all. Accessible pedestrian improvements, the removal of architectural barriers in City buildings and parks, and the inclusive delivery of services have been progressed with consideration of the needs of people with disabilities. Maintenance of existing accessible features has been and will continue to be a priority in City facilities.

In an active effort to improve the City's accessibility, the City hired SZS Consulting Group in 2015 to evaluate and survey all public facilities that hold City programs, services, or activities. Key drivers for this update were new guidance documents for providing accessibility, and new facilities and projects for which the City has taken responsibility since the original plan was prepared in 1992. The final ADA Transition Plan Update focuses on physical barriers in existing City facilities and right-of-way (land or property owned by the City).

SZS Consulting Group compiled all recommendations and evaluations in a finalized ADA Self-Evaluation Report (Attachment A). The Transition Plan also includes the Schedules for public facilities and City public right-of-way (PROW), which will be used to help guide the scoping and

budgeting of future Capital Improvement Program (CIP) projects.

The Transition Plan presents a vision to improve accessibility in the City of Palo Alto over the next 60 years.[1] The Self-Evaluation Report outlines the context of having a Transition Plan and provides recommendations to existing City policies and procedures to ensure all programs, services, or activities are accessible. The Schedule for Public Facilities, Parking, and Parks prioritizes buildings based on the age of the building, planned CIPs, extent of work, and use. The schedule for PROW will be used as a basis for the 30-year, district-by-district sidewalk, curb, and gutter repair program. The Facility Reports identify the deficiencies in each City facility and act as checklists the City can utilize when scoping future CIPs. Databases with all physical barriers assessed in public facilities will be used to track the City's remediation progress.

Background

At the May 11, 2021 Policy and Services Committee meeting (Staff Report ID #12148), the Committee unanimously recommended Council adoption of the ADA Transition Plan Update.

The ADA, enacted on July 26, 1990, provides comprehensive civil rights protections to persons with disabilities in the areas of employment, state and local government services, transportation, telecommunications, and access to public accommodations. In 1992, the City hired Schirmer Engineering Corporation to create an ADA Transition Plan to comply with Federal ADA regulations issued in July 1991. Since 1993, the City's capital improvement program has included an annual project, Americans with Disabilities Act Compliance (PF-93009). This project has been used to fund improvements identified in the 1992 ADA Transition Plan, as well as other improvements brought to the City's attention.

Since the creation of the 1992 plan, the City has acquired new buildings and taken responsibility for the maintenance of additional buildings. At the time of surveying facilities, the City owned or maintained 145 individual buildings, 7 parking garages, 20 surface parking lots, 32 neighborhood parks, and 4 open space preserves that host City programs, services, or activities. The weighted average age of the facilities is about 50 years. Thus, not all facilities were included in the original transition plan nor do they meet current ADA standards as ADA codes have evolved. Even since the facility survey began for this ADA Transition Plan Update, the number of facilities the City is responsible for has changed. For example, Cubberley lease agreements have changed with the Palo Alto Unified School District (PAUSD), and the California Avenue parking lots C-6 and C-7 are designated for the construction of the California Avenue Area garage and Public Safety Building, respectively. Now, the City owns or maintains 139 individual buildings, 8 parking garages, 19 surface parking lots, 32 neighborhood parks, and 4 open space preserves. A

[1] Extended timelines to address physical barriers are common in transition plans, given the large capital expenditures required and because some modifications are not feasible until a more comprehensive remodel of a facility is completed.

comprehensive and updated Transition Plan will help to ensure City programs, services, and activities are accessible to the public.

On October 26, 2015, the City contracted with SZS Consulting Group to identify potential noncompliant items and other physical barriers at City buildings, parking lots, and recreational facilities (Staff Report ID #6050) where the City provides programs, services, or activities to the public. SZS Consulting Group performed facility surveys and reviewed the City's program accessibility. Barrier information surveyed was compiled into facility reports and databases. The Transition Plan will be used to continue efforts by the City to comply with accessibility requirements as established by the ADA, State of California Building Code (CBC) accessibility provisions, PROW Accessibility Guidelines, and case law.

Evaluated facilities are listed in Attachment B. Several buildings at the time of proposal were not included in the scope due to planned CIPs such as Fire Station No. 3 (PE-15003) and Fire Station No. 4 (PE-18004). Newly constructed facilities are designed to comply with current ADA standards and CBC accessibility provisions. The Roth Building was also not evaluated due to plans for renovation by the Palo Alto History Museum Board. The following facilities were not evaluated because the City does not provide programs, services, or activities to the public at these locations: Girl Scouts Building, Boy Scouts Building, Avenidas Senior Center, Alma Community Room, Los Altos Treatment Plant, San Francisquito Creek Pump Station, and Matadero Creek Pump Station.

Facility surveys and draft reports were completed for each identified facility within SZS Consulting Group's scope by September of 2017. City staff reviewed the draft reports and SZS Consulting Group drafted a schedule with prioritization of facilities based on public needs, age of facility, budget, and planned CIP projects. Public outreach was conducted for public input on the schedules and public feedback on facilities in May 2019.

In 1985, the City conducted a survey that assessed the conditions of the sidewalk network in the City's PROW and categorized it into 23 districts. The districts were repaired based on the quantity of repairs required. In 2017, the City completed its 30-year district-by-district sidewalk, curb and gutter repair program. Nichols Consulting Engineers (NCE) collected data from 20 percent of the sidewalk network and nearly 60 percent of the curb ramps in 2017. The data was used to put together the Sidewalk Assessment Study to address sidewalk issues, rank the districts based on the greatest need, and estimate future repair costs. The study identifies six major sidewalk distresses categorized into degrees of severity: cracking, patching, vaulting, faulting, spalling, and holes. The 2019 Sidewalk, Curb, and Gutter Repairs project prioritized areas that require prompt action at various locations throughout the City. Future sidewalk maintenance projects will resume the district-by-district repair program utilizing NCE's order of ranked districts based on the density of priority areas. The Schedule for PROW takes into consideration NCE's Sidewalk Assessment Study to match the schedule with the 2019 Sidewalk, Curb, and Gutter Repairs project and to plan for the 30-year, district-by-district sidewalk, curb,

and gutter repair program through the Sidewalk Repairs (PO-89003) and Curb and Gutter Repairs (PE-12001) capital projects.

The ADA Transition Plan Update focuses on physical barriers in City facilities and the City's PROW. However, as part of this process, City staff and the consultant evaluated other areas identified in the Department of Justice ADA Best Practices Tool Kit for State and Local Governments (DOJ ADA Best Practices Took Kit) such as general effective communication, emergency communications, website accessibility, and emergency management. City staff is planning to create a task workforce that includes key staff members across various City Departments to draft, address, and implement new policies based on the recommendations outlined in the ADA Self-Evaluation Report.

Discussion

The development of a Transition Plan is a requirement of both the Americans with Disabilities Act and for implementation of the Rehabilitation Act of 1973. In addition to fulfilling the requirements of federal law, adopting the Transition Plan will help the City schedule and track its progress during renovation projects as a structured checklist. ADA standards have changed since the original 1992 ADA Transition Plan, as has the City's roster of public facilities, and an updated plan provides better guidance to improve overall accessibility in City public buildings and ROW.

Based on the 2010 ADA guidance for public facilities, a Transition Plan requires the following:

1. Identify physical obstacles in the public agency's facilities that limit the accessibility of its programs or activities to individuals with disabilities;
2. Describe in detail the methods that will be used to make the facilities accessible;
3. Specify the schedule for the transition plan; and
4. Indicate the official responsible for implementation of the plan.

The final Transition Plan fulfills the requirements listed above and includes the following documents (please note that due to size of the documents, individual document components are provided as hyperlinks in the attachments):

1. Self-Evaluation Report
2. Schedule for Public Facilities, Parking, and Parks
3. Schedule for Public Right-of-Way
4. ADA Facility Reports

<u>Self-Evaluation Report</u>

The Self-Evaluation Report (Attachment A) includes context and history behind the ADA and requirements for a Transition Plan. Title II of the 2010 ADA standards applies to state and local government entities, and in Subtitle A, focuses on protecting qualified individuals with disabilities from discrimination based on disability in programs, services, or activities provided by state and local government entities. In the Self-Evaluation Report, SZS Consulting Group outlines what determines a qualified individual with disabilities and defines programmatic

accessibility. SZS Consulting Group reviewed the City's policies and procedures using the DOJ ADA Best Practices Took Kit.

The DOJ ADA Best Practices Tool Kit covers the following categories:

1. ADA Coordinator
2. General Effective Communication Requirements under Title II of the ADA
3. 9-1-1 and Emergency Communications Services
4. Website Accessibility under Title II of the ADA
5. Curb Ramps and Pedestrian Crossings
6. Emergency Management under Title II of the ADA

After receiving responses from various departments on the DOJ ADA Best Practices Tool Kit, SZS Consulting Group provided recommendations that staff actively started to pursue. These recommendations apply to a broad group of City departments. Identified individuals in each Department will be part of the City's taskforce to draft, address, and implement new policies per the recommendations outlined in the matrix. In addition, staff have already undertaken the following actions:

- One of the main recommendations under the ADA Coordinator is to establish a policy to standardize the investigation of all complaints. Staff is in the process of creating a flowchart of individuals as points of contact to resolve issues brought to the City's attention. Staff is also working to add a separate category in the City's 311 application for ADA requests or specific items of concern to ensure that requests from the public are tracked internally and can be routed to the correct point of contact responsible for resolving the request.

- Under General Effective Communication Requirements, SZS Consulting Group recommends having closed captioning of public meetings when posted on the City website. This recommendation is expected to be addressed during the City Council Chambers AV Upgrade Project (TE-19001), as part of the scope is to include closed captioning services for recorded public meetings.

- The City's Information Technology (IT) department assigned a staff member to focus on website accessibility to improve the City's website. A Management Specialist was hired in March 2018 and oversaw website accessibility compliance for each division. The Management Specialist also led the City's monthly Website Department Group meetings, where they discussed website standards, current issues, and accessible website content. SZS Consulting Group is currently helping to advise the Next Generation Website Core Team and the City's new website vendor, OpenCities, by reviewing the City's new design and branding style, page layouts and templates, and page content. SZS Consulting Group was originally scheduled to conduct small audits, or spot checks, throughout the development process. However, due to the COVID-19 pandemic, spot checking was no longer feasible due scheduling conflicts. In order to

continue with a full audit, the Core Team now plans on having SZS review and audit the new website after it goes live. Additionally, they plan to create a transition plan using SZS's findings.

The Self-Evaluation Report also lists functions at each facility in the City that may affect people with disabilities. Most departments include a public-facing counter for transactions and requests for information. Other important functions that affect people with disabilities include information and updates posted on the City website and public meetings such as Council Meetings and Board meetings. These listed functions educate staff on which City facilities may need to be prioritized earlier in the Schedule and where City policies may need to be modified to accommodate people with disabilities.

Schedules

The Transition Plan Schedules are included in Appendices B and C of the Self-Evaluation Report. The Schedule for Public Facilities, Parking, and Parks was prioritized based on the age of the facility, extent of corrective work, budget, planned CIP projects, and public input. In the development of the first draft of the Schedule for Public Facilities, Parking, and Parks, facilities were assigned a priority by SZS Consulting Group based on a four-level priority system.

Priority 1 – Points of arrival on site (parking lots, connecting walkways, transportation) or projects that have been currently budgeted
Priority 2 – Facilities built between 1888 to 2000 that provide programs, services, or activities by the City
Priority 3 – Facilities built between 2000 to 2016 or facilities with an unknown construction date
Priority 4 – Remaining facilities

SZS Consulting Group also took into consideration the facilities that were used most frequently by the largest number of people and based on public outreach feedback.

The Schedule for Public Facilities, Parking, and Parks was then further refined based on the type of facility and extent of work measured by the estimated costs to remediate the identified barriers in the facility. One of staff's goals was to ensure a relatively even amount of work for every five-year block shown on the Schedule for Public Facilities, Parking, and Parks. The total estimated cost is generally larger when a facility has a larger area contributed to programs, services, or activities and is older. For example, although fewer facilities are shown at the end of the Schedule for Public Facilities, Parking and Parks, this is partly due to the higher estimated cost to remediate these facilities.

The Schedule for Public Facilities, Parking, and Parks is seen as an adaptive, living document, and changes are expected to occur depending on the City's progress. Several factors can influence the actual remediation cost such as contracting to complete barriers of the same type. The schedule can also change substantially if accommodations are requested that

reprioritize a building, a change takes place that ensures programmatic accessibility within a facility, or changes in ownership of a facility. For example, the City returned ownership of Cubberley Community Center Buildings A, B, I and portions of Buildings G and M to the Palo Alto Unified School District. This will decrease the estimated cost of remediation by $314,719, the total estimated costs for identified barriers in the Cubberley buildings the City does not lease or own.

Similar to the Schedule for Public Facilities, Parking, and Parks, the Schedule for PROW considers the age of the facility. To simplify the process, the City has assumed that all City sidewalks and curb ramps are deficient with respect to ADA. In fact, not all sidewalks and curb ramps are deficient, but this determination creates a simpler schedule since the City is entering a new cycle of the 30-year district-by-district sidewalk, curb, and gutter repair program. Older districts such as Downtown are prioritized first due to the older average age of ramps and sidewalks.

Facility Reports and Databases

The Facility Reports (Attachment C) identify all physical barriers based on accessibility requirements as established by the ADA and CBC Accessibility provisions. Solutions for each barrier are recommended in each barrier report as suggested by SZS Consulting Group.

In each Facility Report, individual barriers are identified, the relevant codes are noted, and recommendations from SZS Consulting Group are included to remediate the issues. Each barrier is also assigned a cost estimate, which in turn is used to understand the order of magnitude for repairs and where to schedule the remediation of barriers in the Schedule for Public Facilities, Parking, and Parks. The implementation phase and priority of the barrier is also noted in each individual barrier report.

Part of SZS Consulting Group's scope of work includes providing a database for each of the facilities surveyed. This ensures that the City will be able to mark off which physical barriers have been remediated. The databases also allow the City to regenerate reports as needed to show only "open" items for each facility.

Tracking Progress on Remediations

Public Works has been keeping track of recent remediations from CIP and other facilities maintenance projects. Due to the lengthy process of completing the ADA Transition Plan Update, some barriers were removed prior to the finalization of the ADA Transition Plan Update. The Public Works Department Engineering Services Division (PWE) created an Excel system for all City staff to access, update, and document the progress on barrier removals as they take place. Project managers are required to enter information pertaining to the project including which barrier was removed, when it was removed, cost for removal, and a photo for documentation. Staff will then update the databases periodically based on the gathered information from departments. Staff will be looking into a more effective, integrable, electronic means of documenting barrier removals for the long-term.

City individuals who are identified to act in furthering the City's progress in accessibility will submit progress assessments to Public Works Engineering or a later designated individual overseeing the City's overall accessibility. The progress assessment will be documentation from the individual on their team's progress in implementing recommendations from the ADA Self-Evaluation Report. The progress assessments will be submitted annually or when a significant change takes place. The ADA Best Practices Tool Kit provides a consistent method to track the City's progress on ADA accommodations that are not physical barriers in City facilities. Existing examples of progress documentation include annual updates on the City's Information Technology's progress towards an ADA, WCAG 2.1, and Section 508 compliant website and an updated review of the ADA Tool Kit self-evaluation questionnaires.

Timeline

The ADA Transition Plan Schedules will be effective once the Transition Plan is adopted. The Schedule for Public Facilities, Parking, and Parks takes place over 60 years starting in 2021. This timeline was chosen based on the current amount of funding in PF-93009, and is typical for these types of efforts. As noted earlier in this report, the Transition Plan is a living document and these schedules are likely to change over time; for example, due to changes in management of facilities such as Cubberley Community Center.

The Schedule for PROW is compiled into a 30-year cycle annual sidewalk, curb, and gutter repair program, in alignment with the City's annual Sidewalk, Curb and Gutter Repairs Project. The City's determination of all sidewalks and curb ramps being deficient when compiling the Schedule for PROW ensures all districts are addressed based on the age of the district. Staff will determine which sidewalks and curb ramps in each district need to be repaired each year. City staff is currently tracking curb ramps and sidewalks brought into compliance through the City's annual maintenance program and other PWE projects. City staff will also be working with the Development Center if a curb ramp or sidewalk in the PROW is required to be fixed with a private development project.

Resource Impact

No funding is required to approve the ADA Transition Plan itself or the recommendation in this report. Staff recognizes that increased funding will be necessary in order to mitigate barriers outlined in the ADA Transition Reports and will impact funding needs in the Americans with Disabilities Act Compliance (PF-93009) capital improvement program project and future capital projects in departments such as Public Works and Community Services that manage City facilities. Separate capital improvement program projects may be developed to fix identified barriers for a facility, or the mitigation of barriers may be incorporated into annual recurring capital projects. The ADA Transition Plan will aid in budgeting funding for these future capital needs as approved by Council as part of the annual budget process; staff will return to Council if additional appropriations are needed.

Policy Implications
Based on SZS Consulting Group's Self-Evaluation, some City policies may need to be modified or added in order to better accommodate persons with disabilities during programs, services, and activities. Policies may include new procedures or additional training for staff. One such example is having a procedure in place for requesting interpreters and providing alternative formats for City documents.

Stakeholder Engagement
The approval of Amendment No. 4 (Staff Report ID #8573) added public outreach to SZS Consulting Group's scope of services. Three public outreach meetings were hosted by the City and led by SZS Consulting Group on the following dates:

- Monday, May 13, 2019 at 3 pm at Rinconada Library's Embarcadero Room
- Tuesday, May 14, 2019 at 6 pm at Mitchell Park Community Center's El Palo Alto Room
- Monday, May 20, 2019 at 3 pm at College Terrace Library

Staff advertised the meetings through social media, posts on Nextdoor, public print notifications in the Daily Post, and on City webpages such as the Accessibility webpage and project webpage. SZS Consulting Group also emailed a list of organizations that work or support individuals with disabilities in Palo Alto or surrounding areas. The list of organizations contacted is included in the Self-Evaluation Report.

These public outreach meetings kicked off a 45-day public comment period for the public to provide feedback in-person, by email, or by submitting comments through an online survey. A copy of the online survey is included in the Self-Evaluation Report along with results to some of the questions. Questions were developed to better understand popular areas visited by the various type of users in Palo Alto (residents versus commuters). One question also asked for open feedback regarding a user's personal experience in City facilities. Some comments received asked for confidentiality, so submitted responses are not included in the Self-Evaluation Report. The survey was also translated to Chinese in order to reach a greater population of residents at the suggestion of a Human Relations Commission member.

Environmental Review
Approval of the ADA Transition Plan Update is not a project for the purposes of the California Environmental Quality Act (CEQA). Projects including the remediation of physical barriers identified in the Facility Reports may require environmental review due to the facility location and scope.

Attachments:

- Attachment A - ADA Self-Evaluation Report
- Attachment B - Facilities Inventory
- Attachment C - Facility Survey Reports

Attachment A

SZS CONSULTING GROUP

CITY of PALO ALTO, CALIFORNIA

ADA SELF-EVALUATION REPORT

May 11, 2021

SZS
CONSULTING

Sacramento Office
770 L Street, Suite 950
Sacramento, CA 95814
Email: Info@szs-consulting.com
Tel: 916.669.8750
Fax: 888.211.7441

Silicon Valley Office
2225 E. Bayshore Road, Suite 200
Palo Alto CA 94303
Tel: 866.694.7637
www.szs-consulting.com

February 28, 2020

Matt Raschke
Senior Engineer
Public Works Engineering
City of Palo Alto
250 Hamilton Avenue,
Palo Alto, CA 94301

Re: ADA SELF-EVALUATION

Dear Mr. Raschke,

We are pleased to provide this report as a final step in the process to update ADA Transition Plan and Self-evaluation for the City of Palo Alto. Updating the existing Self-evaluation process has brought together City of Palo Alto staff from many departments to provide feedback intended to validate the findings and recommended solutions for barrier remediation.

This document provides a comprehensive analysis of policies and practices in reference to locations where programs, services and activities are provided.

The resulting recommendations will assist the City to improve access for people with disabilities in a more efficient process to help ensure that existing facilities and future alterations comply with California state access statutes, regulation and US Department of Justice requirements. We are gratified for the opportunity to have completed this project with your team.

Regards,

Syroun Z. Sanossian, Principal
SZS Consulting Group LLC

TABLE OF CONTENTS

1. INTRODUCTION…… p. 1

2. ADA TITLE II ENTITY REQUIREMENTS…… p. 2

3. QUALIFIED INDIVIDUALS AND ELIGIBILITY…… p. 5

4. PROGRAMMATIC ACCESSIBILITY…… p. 6

5. DISCRIMINATION IN POLICIES AND PRACTICES…… p. 7

6. EFFECTIVE COMMUNICATION AND ALTERNATE FORMATS…… p. 8

7. ADA REQUIREMENTS FOR THE SELF-EVALUATION…….. p. 10

8. PUBLIC OUTREACH…….. p. 12

9. PALO ALTO PROGRAMS, ACTIVITIES AND SERVICES SPONSORED PROGRAMS AND NON-SPONSORED PROGRAMS…… p. 15

10. RECOMMENDED CHANGES TO POLICIES AND PRACTICES…..……p. 32

11. ADA/CBC TOOLKIT……..…….. p. 36

APPENDIX

A – Public Outreach Questionnaire……..... p. 55

Public Outreach Questionnaire Responses ……..... p .60

B – ADA Transition Schedule for Buildings……..….. p. 74

C - ADA Transition Schedule for the Public Rights-of-Way…. p. 75

1. INTRODUCTION

The Access Board, the Americans with Disabilities Act (ADA) of 1990 & the 2010 ADA Standards for Accessible Design

The Access Board was established by section 502 of the Rehabilitation Act of 1973 (Rehab Act)[1]. The Board consists of 25 total members, 13 of which are appointed by the President from among the general public and the majority of those members must be individuals with disabilities. The remaining 12 members are the heads of 12 Federal departments and agencies specified by statute, including the heads of the Department of Justice and the Department of Transportation (DOT). Originally, the Access Board was established to develop and maintain accessibility guidelines for facilities designed, constructed, altered, or leased using Federal funds under the Architectural Barriers Act of 1968 (ABA)[2].

The passage of the ADA in 1990 expanded the Access Board's responsibilities to "*issue minimum guidelines that shall supplement the existing Minimum Guidelines and Requirements for Accessible Design…to ensure that buildings, facilities, rail passenger cars, and vehicles are accessible, in terms of architecture and design, transportation, and communication, to individuals with disabilities".*[3] On the other hand, the ADA requires the US Department of Justice (US DOJ) to issue enforceable accessibility standards applicable to facilities subject to ADA title II that are consistent with the ''*minimum guidelines*'' issued by the Access Board[4], which means it is required to enforce the standards that the Access Board issues.

The Americans with Disabilities Act (ADA) became effective on July 26, 1990 and it extended legislation intended to eliminate discrimination against individuals with disabilities in federally funded facilities under the Rehab Act to all activities of State and local governments regardless of whether these entities receive Federal financial assistance. It provides for equal access and equal opportunities for individuals with disabilities to participate in programs, services, and activities provided by public entities such as those offered by the city of Palo Alto.

The ADA is divided into five sections, which are referred to as titles. Title I establishes civil rights in employment for individuals with disabilities. Title II requires access to the programs and services of state and local governments, which includes the city of Palo Alto. Title III requires access to public accommodations and commercial facilities – virtually all nonresidential, privately

[1] 29 U.S.C. 792

[2] 42 U.S.C. 4151 *et seq*

[3] 42 U.S.C. 12204

[4] 42 U.S.C. 12134(c); 42 U.S.C. 12186(c)

owned buildings and Title IV governs accessibility of telecommunications and Title V contains miscellaneous provisions related to enforcement of the law.

The Access Board began revising their 1990 standards in 1994 by establishing an advisory committee composed of members of the design and construction industry, the building code community, and State and local government entities, as well as individuals with disabilities. In 1998, the Access Board added specific guidelines on State and local government facilities[5] and building elements designed for use by children. Other updates to the 1990 ADA Standards have been made with the final version being compiled in the 1994 ADA/ABA Guidelines.

The 1994 ADA/ABA Guidelines were the culmination of a long-term effort to facilitate ADA compliance by eliminating inconsistencies among Federal accessibility requirements (ADA & ABA Standards) and between Federal accessibility requirements and State and local building codes. In support of this effort, the US DOJ amended its regulation implementing title II and adopted standards consistent with 1994 ADA/ABA Guidelines, naming them the 2010 ADA Standards for Accessible Design.

On March 15, 2011, the final rule on the 2010 ADA Standards for Accessible Design became effective to revise the 1990 regulations that implement title II of the ADA that prohibit discrimination on the basis of disability in State and local government services. The final rule was issued in order to adopt enforceable accessibility standards under the ADA that are more consistent with the minimum guidelines and requirements issued by the Access Board, and to update or amend certain provisions of the title II regulation so that they better reflect the Department's legal and practical experiences in enforcing the ADA since 1991. These new regulations provide a higher degree of clarity to State and local agencies that put forth the effort to comply with the spirit and intent of the ADA.

2. TITLE II ENTITY REQUIREMENTS

Title II, Subtitle A covers all programs, services, and activities of state and local government agencies. The City of Palo Alto is covered by the requirements of Title II. The US DOJ regulation implementing title II, 28 CFR 35.103, provides the following:

> (a) *Rule of interpretation.* Except as otherwise provided, the 2010 ADA Standards shall not be construed to apply a lesser standard than the standards applied under title V of the Rehabilitation Act of 1973 (29 U.S.C. 791) or the regulations issued by Federal agencies pursuant to that title.

[5] 63 FR 2000 (Jan. 13, 1998)

(b) *Other laws.* The 2010 ADA Standards do not invalidate or limit the remedies, rights, and procedures of any other Federal, State, or local laws (including State common law) that provide greater or equal protection for the rights of individuals with disabilities or individuals associated with them.

This rule is critical in California, as more stringent statutes such as the Unruh Act (Civil Code 51) and regulations such as Government Code §12900-12996 defined as the California Fair Employment and Housing Act (FEHA) apply. The ADA defines a disability as a physical or mental impairment that limits one or more major life activities (such as walking, hearing, seeing, caring for oneself, speaking, breathing, learning, and working). Under the FEHA, a disability is defined as a physical or mental impairment that only *limits* (not substantially limits) one or more major life activity, which is a much more broad definition. Disabilities, which limit a major life activity, are identified on an individual basis and are based not on the *existence* of a disability, but rather the *impact* that the disability has on an individual.

Impairment is identified when the conditions, manner, or duration under which a major life activity can be performed by an individual are limited when compared to most people. Some general types of disabilities or impairment are visual, hearing, mobility, cognitive, psychiatric, speech, learning in nature, in addition to numerous non-visible impairments.

The use of the term *disability* instead of *handicap* or the phrase *individual with a disability* instead of "handicapped individual" represents an effort by the US Congress and others to make use of up-to-date, currently accepted terminology that does not define people by their disabilities. As with racial and ethnic epithets, the choice of terms to apply to a person with a disability is overlaid with stereotypes, patronizing attitudes, and other emotional connotations. California vehicle code §22511.9 requires that parking signage installed since the passage of the ADA in 1992 not use the term *handicapped*.

Many individuals with disabilities, and organizations representing such individuals, object to the use of such terms as *handicapped* or *the handicapped*. In other recent legislation, Congress also recognized this shift in terminology, e.g., by changing the name of the National Council on the Handicapped to the National Council on Disability (Pub. L. 100- 630). Other comparative illustrations include use of the antiquated term “crippled” rather than *disabled* or “mentally retarded”, rather than *cognitively impaired*. The characterization of a person who has an impairment, in comparison to persons with conditions that do not limit one or more major life activities, is illustrated in the following examples:

<u>Seasonal hay fever</u>:

- a general nuisance for the sufferer
- treated with over-the-counter medication

- duration of condition is limited (seasonal)
- does not significantly curtail activities

Multiple Chemical Sensitivities

- severe, dehabilitating symptoms
- individual unable to be out in public places
- activities significantly curtailed

This person has a disability.

A broken leg with a cast

- Duration of injury limited
- Activities only moderately curtailed
- Normal activities can be performed with certain simple modifications (crutches)

A severe leg fracture

- Requires multiple surgeries and extensive physical therapy
- Lengthy duration of treatment
- Activities significantly curtailed
- Individual unable to care for themselves

This person has a disability.

The ADA and FEHA define three general categories of disabilities; as follows:

1) Individuals with *commonly regarded* disabilities such as chronic medical illnesses, heart disease, cerebral palsy, multiple sclerosis, HIV/AIDS, arthritis or alcoholism,

2) Individuals with *a history or record* of having such an impairment including cancer survivors, etc. or individuals with a history of treatment for mental illness. Drug addiction is considered a disability but in order to be protected by the ADA, the individual must be either successfully rehabilitated or currently participating in a treatment program. Persons who use methadone as a part of a treatment program are protected, as well as individuals who use controlled substances under the care of a licensed physician. Persons who currently engage in the use of illegal drugs can be denied access to programs, services, or activities,

3) Individuals *perceived or regarded* as having a disability. These individuals generally have no disability but are discriminated against due to fear, myth or stereotyping. An example of this type of disability is an individual who has severe facial scars as a result of burns, who repeatedly experiences rejection when applying for employment due to his/her physical appearance. This person is protected by the ADA.

Physical characteristics, such as eye color or skin color are not considered to be physical or mental impairments. Disadvantages of an environmental, cultural, or economic nature are also not considered to be physical or cognitive impairments. Age, in and of itself, is not impairment although the elderly comprise the largest percentage of persons with disabilities in the US. The ADA also extends its protection to people who do not have disabilities themselves but are discriminated against on the basis of their association with a person with a disability.

A person who experiences this type of discrimination, referred to as *associational discrimination* has the right to relief under the ADA but is not entitled to request reasonable accommodation in employment, as people who have disabilities themselves are entitled to do. The above-mentioned information is not intended to be an all-inclusive list of disabilities that are covered under the ADA. It is recognized that other conditions may be identified that would fall under these definitions.

3. QUALIFIED INDIVIDUALS AND ELIGIBILITY

The presence of a disability is not, in and of itself, an automatic qualification for use of or admittance to any or all programs, services or activities offered by the city of Palo Alto. Persons with disabilities must also possess the qualifications required for participation by other individuals in programs, services and activities. A *qualified individual* with a disability is defined as an individual who meets the **essential eligibility requirements** that the public entity has set forth as required to receive benefits and services or participate in its programs or activities.

The individual should also be eligible to receive those same benefits and services or participate in those same programs or activities with or without reasonable modifications made to policies, practices, or procedures by the public entity. Reasonable modifications that will enable an individual with a disability to participate in a program, service and activity that Palo Alto provides may include the removal of structural, architectural, communication, or transportation barriers, or the provision of auxiliary aids and assistive devices but a person must first qualify for the basic requirements for participation in the program, service or activity provided.

An example of a typical scenario in which this definition of a *qualified individual* applies is as follows: A city or county provides a program for single parents who are looking for a job and are having difficulty juggling their parental responsibilities and their job search. The program is very successful and many people apply to use the program. One person interested in joining the program is a person with a hearing impairment; she/he applies to use the job placement program created for use by single parents. This particular person with a hearing impairment has a verified disability but is not a single parent and therefore, is not a *qualified*

individual whose right to participate in the program is protected by the ADA. The person needed to be a single parent in order to make use of the program.

For the purposes of employment, a *qualified individual* with a disability is an individual who can perform the essential functions of the job, either held or sought, with or without reasonable accommodation. No unqualified job applicant or employee with a disability can claim employment discrimination under the ADA. Employees must meet all the requirements of the job and be able to perform the essential functions of the job with or without reasonable accommodation.

4. PROGRAM ACCESSIBILITY

Under Title II, a public entity must operate each program, activity, or service in such a manner that, *when viewed in its entirety*, it is readily accessible to and usable by individuals with disabilities, unless achieving accessibility would cause a fundamental alteration in the nature of the program, activity, or service. This creates a focus on the programs, services and activities that the City of Palo Alto provides, rather than the facilities in which they provide them in. The City is also not required to provide access to programs, services or activities where the mitigation of barriers would result in undue financial or administrative burdens to the entity, or either threaten or destroy the historic significance of an historic facility.

In practical terms, this means that pursuing physical barrier removal to improve accessibility is not the only option provided by the ADA for public entities. Other methods such as modifications to policies and practices can be implemented along with, or independent of, physical barrier removal in order to achieve accessible programs, services and activities. This practice is known as *program accessibility*. Methods used to achieve program accessibility include but are not limited to: relocating services to accessible buildings, providing new equipment, redesigning existing equipment, assigning aides to individuals with disabilities, providing home visits, making alternative formats available, delivering services at alternate accessible sites, altering existing facilities, pursuing physical barrier removal and/or constructing new facilities.

An example of how program accessibility can be provided is as follows: a county Health and Human Services Department (HHS) that provides services for Women/Infant/Children (WIC) at five different physical locations. This WIC program is sponsored and funded by the county and federal government, and two of the physical buildings where the WIC program is offered are in parts of the county where no public transportation exists. Under the ADA, the county is not required to make each of the five facilities physically accessible, but instead is required to make sure that the WIC program, *when seen in its entirety* is accessible. This means that the county must ensure that at least one, but not necessarily all of the locations where the program is offered, are physically accessible to people with disabilities, as well as all able-bodied people.

The goal of the ADA is to achieve full integration of individuals with disabilities into the fabric of society. The ADA does not establish preferences for persons with disabilities, as may be perceived by the public at large. Public entities are obligated to provide the most integrated setting possible. Individuals with disabilities cannot be restricted from participating in general activities where separate programs, services or activities are provided expressly for them. Persons with disabilities should be allowed to participate in programs, services and activities with able-bodied persons. The expectation is that individuals with disabilities be given a choice as to which program, service or activity to participate in. When choosing a method (or methods) to provide program access, a public entity must give priority to the method or methods that result in the most integrated setting appropriate to encourage interaction among all users, including individuals with disabilities.

5. DISCRIMINATION IN POLICIES AND PRACTICES

Discrimination against persons with disabilities is prohibited by the ADA in written policies, as well as actual practices. By definition, discrimination can take the form of direct action, actions taken on behalf of the entity under a contractual relationship, such as that between the City of Palo Alto and a consultant to the City, or actions taken by another Title II entity, such as a county or regional transit authority.

Discriminatory practices or policies can be explicitly exclusionary, although policies that appear to be neutral can also discriminate. For example: Many persons with vision impairments cannot obtain drivers' licenses. Since a drivers' license has become the most common form of personal identification, this poses a problem for persons who cannot obtain a license. Therefore, if a policy is instituted that requires a drivers' license as the only form of identification that persons can use in order to be allowed to participate in any program, service or activity, the policy may indirectly exclude individuals who due to their disability are unable to obtain a drivers' license.

When a public entity engages in licensing or certification, an individual cannot be denied licensure or certification if the person can meet the eligibility criteria. Also, public entities cannot establish criteria for licensing or certification, which have the effect of limiting participation.

If examinations are administered for the certification licensing process, they must take place in a location that is physically accessible to persons with disabilities and in a manner in which persons with vision, hearing or other impairments are provided opportunity to take the examination in the same manner in which other non-disabled persons are provided.

Eligibility criteria, which screen out or tend to screen out persons with disabilities, are prohibited unless such eligibility criteria are vital to providing the service or

program. As an example; a program is discriminatory that requires persons with disabilities to be accompanied by an attendant.

Neutral rules such as safety requirements are generally allowed even if they screen out individuals with disabilities. As an example, a minimum level of vision is acceptable as a prerequisite for participation in an archery course or other activities where safety constraints exist and vision is required. In addition, it is not permissible for a public entity to charge persons with disabilities a surcharge to offset the costs of providing accessibility.

General access to electronic information must also be provided for persons with disabilities, including web accessibility. When necessary, individual accommodations must be made in order to offer programs, services and activities that satisfy this requirement. Accessible programs, services and activities that must be provided include, but are not limited to excursions, seminars or courses necessary to complete instruction. New technologies that enable electronic accessibility are to be evaluated on a regular basis as they become available on the market.

6. EFFECTIVE COMMUNICATION AND ALTERNATE FORMATS

The provision of equally effective communication is often one of the greatest challenges to state and local agencies. Section 35.106 requires that the City of Palo Alto take steps that may be necessary to ensure that communications with applicants, participants and members of the public with disabilities are as effective as communication with others. The requirement is to provide appropriate auxiliary aids and services when necessary to afford people with disabilities an equal opportunity to participate in and enjoy the benefits of the City's program, service or activity.

The City also must allow people with disabilities to request an auxiliary aid or service of their choice and the express choice must be given primary consideration by the City[6]. Furthermore, the City must honor the choice of alternate format unless it can demonstrate that another effective means of communication exists or that use of the means chosen by the person is not required under the ADA. Honoring the request of the person with disabilities is important because of the range of types of disabilities, the variety of auxiliary aids and services available and different circumstances that require effective communication. For example, many courtrooms are now equipped with computer-assisted transcription which can be very useful auxiliary aids for people that are blind, deaf or hard of hearing but can use speech to communicate, but would be useless for those who communicate using sign language.

[6] 35.160(b)(2)

There are two major categories of programs, services and activities covered by the ADA:

1. Programs, services and activities involving general public contact as part of ongoing operations of the entity, and

2. Programs, services and activities directly administered by the entity for program beneficiaries and participants.

Activities in both categories involve direct communication with the public during public use of the City's facilities. These activities can include telephone contacts, office walk-ins, interviews or web-based interfaces, etc.

This requirement facilitates the goal of inclusion of persons with disabilities but it can be complex. In practical terms, the City of Palo Alto is required to make and provide all of the documents that it makes public in formats that are accessible to people with impairments. Common types of alternative formats provided by public entities include audio format, Braille, electronic text documents that are in HTML (hypertext markup language) format[7] on a CD or other form of portable digital device, not in PDF (portable document format), large print format at min. 18 point in a simple Serif font, providing persons who serve as readers or note-takers at public meetings and videotaping with real-time captioning. This list of possible alternate formats is not all-inclusive.

Public entities are required to provide interpreter services for activities unless the provision of such services results in a fundamental alteration in the programs, services and activities offered by the entity, or if the provision of such services constitutes an undue financial burden to the entity.

The use of oral and manual interpreters is also an integral part of producing an accessible learning environment. Qualified interpreters must be used and must be able to interpret effectively, accurately and impartially. Interpreters should be able to receptively and expressively interpret as well as possess expertise in any necessary specialized vocabulary.

An interpreter is necessary when the information imparted is complex or lengthy in nature. Factors to take into consideration when deciding whether or not to provide an interpreter are the context of the event, the number of people involved and the importance of the information involved. An example of when an interpreter is necessary is for a patient with a disability in a health clinic where serious medical information must be discussed. Another situation may not require an interpreter,

[7] Documents that are intended to be read by the visually impaired using software require alt tags that the software can read and audibly communicate to the user. These tags cannot currently be added to documents saved in PDF but are usable when posted in HTML.

such as that of a visitor with a hearing impairment who purchases food at a cafeteria or persons who must pay a parking ticket who can be adequately served by use of a paper and pencil, even though the particular person normally uses sign language to converse.

7. ADA REQUIREMENTS FOR THE SELF-EVALUATION

Section 35.105 of the Americans with Disabilities Act requires a public entity to perform a Self-Evaluation prior to 1995, and the City of Palo Alto was incorporated on April 23, 1894. An original ADA Transition Plan and Self-Evaluation was completed in 2001 by City staff, which has been reviewed and incorporated into this update. SZS has created this updated Self-Evaluation using an adaptation of the ADA Tool Kit from the US DOJ that includes requirements specific to California statue and regulation. The adapted ADA Tool Kit is entitled the ADA/California Code of Regulations Title 24 - Best Practices Tool Kit for State and Local Governments (Tool Kit). The updated ADA Transition Plan is contained in a separate document.

The regulations governing this Self-Evaluation are based on those originally found in Section 504 of the Rehabilitation Act of 1973 and the 1991 ADA Standards. The 2010 ADA Standards for Accessible Design did not change the requirements for the Self-Evaluation update. According to the US DOJ's ADA Title II Regulations published on September 15, 2010, a Self-Evaluation must provide the following basic requirements:

- A public entity shall evaluate its current services, policies, and practices, and the effects thereof and to the extent that modification of any such services, policies, and practices is required, the public entity shall proceed to make the necessary modifications.

- A public entity shall provide an opportunity to interested individuals, including individuals with disabilities and organizations representing individuals with disabilities, to participate in the Self-Evaluation process by submitting comments.

- A public entity, which employs 50 or more individuals, shall, for at least three years following completion of the Self-Evaluation, maintain on file and make available for public inspection:

    1) A list of the interested individuals consulted,

    2) A description of areas examined and any problems identified,

    3) A description of any modifications made.

- If a public entity has already complied with the Self-Evaluation requirement mandated when implementing Section 504, then the requirements of this section shall apply only to those policies and practices that were not included in the previous Self-Evaluation.

The basic function of the Self-Evaluation is to ensure that policies and practices that govern the programs, services and activities that the City of Palo Alto provides are not discriminatory. Department of Justice regards the process of creating an ADA Transition Plan and Self-Evaluation as a good faith effort to comply with ADA Title II requirements. The information about physical barriers detailed in the updated ADA Transition Plan is essential to this Self-Evaluation. The physical barrier data must be correlated with the programs, activities and services provided in those same physical locations to create an overall view of how programs, activities and services function at these facilities while defining where physical alterations must take place or changes to policies and procedures must be made to provide access. The ADA intended public entities to combine an evaluation of their physical environment in with an evaluation of the associated policies and procedures, so that a public entity could be seen as a functioning whole.

Policies and procedures that govern programs, activities and services may be non-discriminatory, but if the facility they are located in is not accessible, persons with disabilities may be excluded from participating in those programs, services and activities. That concept is also true for the reverse; if facilities are physically free of barriers, there may be discriminatory policies or practices that prevent persons with disabilities from making use of the otherwise accessible facilities.

This Self-Evaluation is part of an update process to provide a comprehensive ADA Transition Plan and Self-Evaluation that combines the physical assessment of City buildings and parks. Phase I of this update process was completed on September 12, 2018 and included City buildings, parks and parking facilities.

The field updated investigations provided data intended to correlate physical access with policies and practices addressed in the ADA Self-Evaluation. The 2010 ADA Standards require that a Self-Evaluation provide a *description of areas examined and any problems identified*, and the *description of any modifications made*. The comprehensive ADA Transition Plan will provide the systematic and detailed presentation of each barrier that must be removed along with the annual phase in which the barrier will be removed, in order to ensure that programs, services and activities are accessible to people with disabilities.

The barriers identified within the updated ADA Transition Plan will be prioritized and organized into mitigation phases within a paper document in binder format and within the MS Access® database to correlate physical barrier removal over a period of annual phases that correspond to the city's budgetary constraints. The Self-Evaluation will outline policies and practices that will improve access where

physical barrier removal cannot be used to improve access through the process of program accessibility.

A P*ublic Notice*[8] was posted as a news release at the outset of the process and the City website has posted regular updates to the process throughout. The intent of the notice was to inform the general public that this ADA Transition Plan update process had been initiated. These notices form part of the public *Statement of Commitment*, which is required of each public entity that performs this process to provide more accessible facilities. Once the ADA Transition Plan/Self-Evaluation process begins, the S*tatement of Commitment* and Public Notices serve as evidence of a good faith effort to improve access. Once the process is complete and the ADA Transition Plan/Self-Evaluation is in place, implementation of the transition plan and documentation of such implementation is essential to ensure that the public remains aware of progress being made by the City of Palo Alto to improve access.

Compliance is not a static condition; programs, services and activities change or grow, and facilities are altered and built over time. This change is typical and it requires on-going monitoring and review by the City to ensure continued compliance.

SZS has adapted this Toolkit for use in California within the ADA regulatory framework, based on state regulations, statutes and case law to help ensure that California communities better understand the issues involved in providing equal access for people with disabilities, not only under the ADA but in concert with our stringent state requirements. The intent of this Toolkit is to learn:

- The role and responsibility of an ADA Coordinator;
- How to identify red flags that indicate that programs, services and activities may have common ADA or CCR Title 24 compliance problems; and
- How to remove the barriers and fix the common compliance problems identified.

City departments and staff members with responsibility for producing effective communication, carrying out ADA Coordinator duties, providing website access, emergency services and other tasks have filled out the checklists and completed the self-tests contained in the documents provided.

[8] §35.106 Notice

8. PUBLIC OUTREACH

The City of Palo Alto understands the value of public input and sought to include people with disabilities in this process. An opportunity for interested individuals to participate in the self-evaluation and transition planning processes by submitting comments was provided through public outreach.

SZS assisted the City of Palo Alto in this process to develop questionnaires, a presentation for the public outreach meetings and held the presentations at each meeting. Designated City staff was present to answer questions and provide input on information that was presented. The public meetings were advertised in the local newspaper (The Daily Post), at local senior centers and the local Independent Living Centers. A questionnaire was developed to gather input in a web-based format with alternate formats provided, including large print paper format and MS Word files available on flash drives to those who requested the alternate format to be mailed. Braille format questionnaires were also available upon request.

The public outreach questionnaire was advertised on the City website and made available to the public by use of flyers provided in conspicuous locations within City buildings and was available in a paper format and large print format at each of the three public outreach meetings.

Three separate public outreach meetings were held on the following dates:

- Monday, May 13, 2019 at 3 pm held at the Rinconada Library
- Tuesday, May 14, 2019 at 6 pm held at the Mitchell Park Community Center
- Monday, May 20, 2019 at 3 pm held at the College Terrace Library

The questionnaire was available for a 45-day comment period from May 13, 2019 to June 28, 2019. The public outreach meetings were advertised with the following organizations:

Abilities Unites	www.AbilitiesUnited.org	525 East Charleston Road, Palo Alto, CA 94306
Avenidas	https://www.avenidas.org	Cubberley Community Center, 4000 Middlefield Rd, #1-2, Palo Alto, CA 94303

ARC of San Francisco	http://www.thearcsf.org	1500 Howard Street San Francisco, CA 94103
California Council of the Blind	http://ccbnet.org/drupal7/	2143 Hurley Way, Suite 250 Sacramento, CA 95825
California Disability Services Association	http://www.cal-dsa.org	1107 9th Street, Suite 540 Sacramento, CA 95814
Canine Companions for Independence		2965 Dutton Avenue, Santa Rosa, CA 95402
Community Living Campaign	https://www.sfcommunityliving.org	1663 Mission Street, Suite 525 San Francisco, CA 94103
Deaf Counseling Advocacy and Referral Agency (DCARA)	https://dcara.org	14895 E 14th Street, Suite 200, San Leandro, CA 94578
Deaf Services of Palo Alto	http://dspa.org	PO Box 60651, Palo Alto, CA
Disability Resource Agency for Independent Living	http://www.drail.org/index.html	920 12th Street Modesto, CA 95354
Disability Rights CA	http://www.disabilityrightsca.org	1831 K St, Sacramento CA
Department of Rehabilitation (DOR)		800 Menlo Ave, #122, Menlo Park, CA
Goodwill of Silicon Valley	http://www.goodwillsv.org	1080 North 7th St. San Jose, CA 95112
Hearing and Speech Center of N. California	https://www.hearingspeech.org/about-us/contact-us/	1234 Divisadero St, San Francisco, CA 94115
In Home Support Services - SF	http://www.sfihsspa.org/sfihss/	832 Folsom Street, 9th Floor San Francisco, CA 94107
Lighthouse for the Blind and Visually Impaired	http://lighthouse-sf.org	1155 Market Street, 10th Floor San Francisco, CA 94103
Momentum for Mental Health	https://www.momentumformentalhealth.org	438 N. White Rd., San Jose, CA 95127

Parents Helping Parents, Inc.	http://www.php.com	1400 Parkmoor Ave, Ste 100, San Jose, 95126
San Andreas Regional Center	http://www.sarc.org	Santa Clara County, 6203 San Ignacio Ave, Ste 200, San Jose, CA 95119
Senior and Disability Action	https://sdaction.org	1360 Mission Street #400 San Francisco, CA 94103
Silicon Valley Independent Living Center (SVILC)	http://www.svilc.org	25 N. 14th St., San Jose, CA 95112
State Independent Living Council	https://www.calsilc.ca.gov	1600 K Street, Suite 100, Sacramento, CA 95814
Toolworks	https://www.toolworks.org	25 Kearny Street, Suite, 400, San Francisco, CA 94108
US Dept. Veterans Affair - Palo Alto Polytrauma and Blind Rehabilitation Center	https://www.polytrauma.va.gov/facilities/Palo_Alto_PTRP.asp	3801 Miranda Ave., Palo Alto, CA 94303
Vista Center for the Blind and Visually Impaired		2500 El Camino Real, Suite 100, Palo Alto, CA 94306

The questionnaire and the responses compiled are provided in Appendix A.

9. PALO ALTO PROGRAMS, ACTIVITIES AND SERVICES

SPONSORED PROGRAMS AND NON-SPONSORED PROGRAMS

The City of Palo Alto has contracted with SZS to assist with the task of producing an ADA Self-Evaluation as an update to the existing City of Palo Alto ADA Transition Plan and Self-Evaluation in compliance with both the Americans with Disabilities Act (ADA) requirements and the California Code Requirements Title 24 (CCR) that contains the state accessibility standards.

Both the information regarding physical barriers identified in the field investigation and the information obtained from the public directly affect the programs, services and activities provided by the City of Palo Alto. This section of the document identifies these programs, services and activities provided.

Programs, services and activities offered by the City of Palo Alto have been researched and an inventory of City programs, services and activities has been compiled. Please note: the following information may not be a complete list due to

facilities added to the City's inventory after facilities were evaluated or facilities not included due to planned construction or lease agreements.

CITY FACILITY #	FACILITY NAME	ADDRESS
1	Animal Services	3281 E. Bayshore Rd.
2	Arastradero Preserve Gateway Facility and Preserve	1530 Arastradero Rd.
3	Art Center	1313 Newell Rd.
4	Baylands, Athletic Center and Preserve	1775 Embarcadero Rd., 1900 Geng Rd., 2500 Embarcadero Rd., 2560 Embarcadero Rd. , 2775 Embarcadero Rd.
5	Children's Library	1275 Harriet St.
6	Children's Theater & Girl Scouts Building	1305 Middlefield Rd.
7	Civic Center	250 Hamilton Ave. (Police Department - 271 Forest Ave.)
8	College Terrace Library	2300 Wellesley St.
9	Cubberley Community Center	4000 Middlefield Rd.
10	Downtown Library	270 Forest Ave.
11	Firestation #1 (University Park)	301 Alma St.
12	Firestation #2 (Mayfield)	2675 Hanover St.
15	Firestation #5 (Arastradero)	600 Arastradero Rd.
16	Firestation #8 (Foothills Park)	3300 Page Mill Rd.
17	Green Waste Facility	2000 Geng Rd.
18	Junior Museum & Zoo	1451 Middlefield Rd.
19	Landfill Facility	2380 Embarcadero Rd.
20	Lucie Stern Community Center	1305 Middlefield Rd.
21	Mitchell Park Library	3700 Middlefield Rd.
22	Mitchell Park Community Center	3700 Middlefield Rd.
23	Municipal Service Center (MSC)	3201 E to 3241 Bayshore Rd
24	Palo Alto Airport Terminal Building (Portables)	1925 Embarcadero Rd.
25	Rinconada Library	1213 Newell Rd.
28	Ventura Community Center (PA Comm Childcare - 1992 TP)	3990 Ventura Ct.
29	Water Quality Control Plant	2501 Embarcadero Way
30	Williams House	351 Homer Ave.
31	Winter Lodge (Community Skating - 1992 TP)	3005 Middlefield Rd.
32	Parking Garage - Lot B	531 Ramona St.
33	Mid-Town Parking Lot	Midtown Ct. off Colorado Ave.
34	Emerson / Lytton Lot A	401 Ramona St.
35	Ramona/Lyttton Lot C	451 Ramona St.
36	Hamilton / Waverley Lot D	375 Hamilton Ave.

37	Gilman / Bryant Lot E	642 Gilman St.
38	Florence / Lytton Lot F	415 Florence St.
39	Gilman / Waverley Lot G	643 Gilman St.
40	Cowper / Hamilton Lot H	530 Cowper St.
41	Parking Garage - Lot J (Cowper/Webster)	520 Webster St.
42	Lytton / Waverley Lot K	351 Lytton Ave.
43	Emerson / Ramona Lot N	539 Emerson St.
44	Emerson / High Lot O	460 Emerson St.
45	High / Hamilton Lot P	551 High St.
46	Parking Garage - Lot Q (under residential)	430 High St.
47	Parking Garage - Lot R (High Street)	528 High St.
48	Parking Garage - Lot S/L (Bryant Street)	445 Bryant St.
49	Lytton / Kipling Lot T	450 Lytton Ave.
50	California Avenue BD Lot 1	276 Cambridge Ave.
51	California Avenue BD Lot 2	370 Cambridge Ave.
52	California Avenue BD Lot 3	275 Cambridge Ave.
53	California Avenue BD Lot 4	391 Cambridge Ave.
54	Cambridge Parking Garage (Lot 5)	400 Cambridge St.
55	California Avenue BD Lot 6	250 Sherman Ave.
56	California Avenue BD Lot 7	350 Sherman Ave.
57	California Avenue BD Lot 8	450 Sherman Ave.
58	California Avenue BD Lot 9	2350 Birch St.
59	Civic Center Office Building Public Parking	250 Hamilton Ave.
60	Ted Thompson Parking Garage	275 Cambridge St.
63	Bol Park	3590 Laguna Ave
64	Boulware Park	410 Fernando Ave
65	Bowden Park	Alma Street at North California Avenue
66	Bowling Green Park / (Lawn Bowling - 1992 TP)	474 Embarcadero Road
67	Briones Park and Restrooms (Juana Briones Park)	609 Maybell Ave. (Arastradero at Clemo Ave.)
68	Byxbee Park and Restrooms	2375 Embarcadero Road, 2380 Embarcadero Rd.
69	Cameron Park	2101 Wellesley Street
70	Esther Clark Park	Old Adobe Rd off of Arastradero Rd
71	Cogswell Plaza	264 Lytton Ave
72	El Camino Park, Restrooms, and Scorekeeper Facility	100 El Camino Real
73	Eleanor Pardee Park	851 Center Drive
74	El Palo Alto Park	117 Palo Alto Avenue
75	Foothills Park	3300 Page Mill Rd.

76	Gamble Garden Center	1431 Waverley St.
77	Golf Course	1875 Embarcadero Rd.
78	Greer Park and Restrooms	1098 Amarillo Ave.
79	Heritage Park	300 Homer Ave
80	Hoover Park and Restrooms	2901 Cowper St.
81	Hopkins Creekside Park	Palo Alto Avenue
82	Johnson Park	Everett and Waverley
83	Kellog Park	Waverley at Embarcadero Road
84	Mayfield Park	2300 Wellesley Street
85	Mitchell Park and Restrooms	600 E. Meadow Dr.
86	Monroe Park	Monroe and Miller Avenue
87	Peers Park, Clubhouse and Restrooms	1899 Park Ave.
88	Ramos Park	800 East Meadow Dr
89	Rinconada Park	777 Embarcadero Rd.
90	Robles Park	4116 Park Boulevard
91	Scott Park	Scott Street at Channing Avenue
92	Seale Park and Restrooms	3100 Stockton Place
93	Stanford - Palo Alto Playing Fields and Restrooms	2700 El Camino Real
94	Terman Park	655 Arastradero Road
95	Sarah Wallis Park	202 Ash Street at Grant Avenue
96	Weisshaar Park	2300 Dartmouth Street
97	Werry Park	2100 Dartmouth Street

Some programs, services and activities provided in facilities owned by the City of Palo Alto are not sponsored by the City. In terms of accessibility, those programs have the same requirements as do the City-sponsored programs. The identification of location, function and persons served by each program, service and activities is essential to fully completing this process and providing a useful Self-Evaluation document. With that information, the identification and evaluation of the policies and practices that govern the administration of these programs, activities, and services can be performed.

City facilities are locations where many sponsored and non-sponsored City programs, services and activities take place. The list below contains specific programs that take place at specific locations to assist the City in applying programmatic access, which may include relocation of programs to accessible locations, among other options. Each City facility is not listed below, as many facilities provide basic services such as parking provided at parking lots or structures.

Parks and recreation areas provide varied programs, as described below. Administrative services are also provided in the Civic Center building, which streamlines the provision of program access. Where one meeting room is not

accessible, another can be scheduled for use that is equipped with accessible features. The City provides the following list of programs, services and activities, and policies administered by the City as indicated in the chart below.

PROGRAM, SERVICE or ACTIVITY	ADDRESS	DESCRIPTION	PHYSICAL or WEB-BASED?
PLANNING DEPARTMENT			
Building Department Services	285 Hamilton Ave # 1 (across from Civic Center)	Administer/Supervise all Building Operations, Maintain public counter, Inspect Residential & Commercial Construction, Inspect/Issue Certificates of Occupancy, Assist homeowners in code compliance, Process permit applications, Review residential & commercial plans	Physical
Development Services	285 Hamilton Ave # 1 (across from Civic Center)	Review project plans for compliance with applicable codes for public and private development projects, Issue no-parking signs, Maintain reception area and counter operations/staffing, Manage application appointments/scheduling, manage all application submittals and routing, Project coordination, Over-the-counter permits, Handle and route ADA Requests, Perform residential and commercial building inspections, Coordinate certificates of occupancy, Project facilitation, In-field plan revisions, Handle Stop work orders, Provide construction engineering support, Maintain/update inspector guidebooks and checklists	Physical
Planning Administration Services	250 Hamilton Ave	Maintain public information and public counter, Maintain information on City website, Respond to complaints, Process entitlements through public hearing process, Process applications over the counter, Answer phones and schedule meetings, Handle and resolve public record requests, Update and manage department website, Distribution of Census	Physical/Web

Planning/Environmental Services	Service/Activity	Publish various environmental documents, Prepare and publish public comments, Hold meetings with consultants/contractors	Physical
Code Enforcement	250 Hamilton Ave	Respond/investigate violations of city municipal code (RMC) and zoning, Provide clarification of city municipal code (RMC) and zoning, Review and approve after hours construction permits and construction parking permits, Manage Construction Waste and Diversion Program, Education and outreach to the public, Manage 311 application, Provide backup support at the counter.	Physical/Web
PaloAlto311	N/A	Provides phone number and website where the public can report street issues to request repairs, etc.	Web
PUBLIC WORKS DEPARTMENT			
Engineering Counter Services	285 Hamilton Ave #1 (across from Civic Center)	Maintain public information and public counter, Administer City specifications and improvement standards, Review environmental impact documents, Maintain AutoCAD mapping system, Maintain city-wide base map & benchmark system, Counter services for proposed projects/entitlements/permit applications	Physical
Engineering Public Counter Services	250 Hamilton Ave	Retain and administer design contracts, Monitor and maintain CIP projects, Perform basic review of hydrology impacts (pre- and post-flows/volumes from proposed projects, Respond to public concerns or complaints, Provide public outreach for CIPs	Physical
Zero Waste Palo Alto	Online access only	Provides information on waste programs provided by the City via webpage updates, social media, emails, physical flyers, and handouts, Manage Household Hazardous Waste Program, Refuel Your Fun campaign, Reuse Cabinet program, and other associated programs, outreach and events, Update and maintain Zero Waste and Household Hazardous Waste websites	Physical/Web

The Creek Monitor Website	Web	Website that provides information on the San Francisquito Creek Watershed Early Flood Warning System and provides information on weather reporting for the area surrounding the creek	Web
TRANSPORTATION DEPARTMENT			
Public Counter Services	250 Hamilton Ave	Respond to public requests for information, Address and respond to public concerns and issues by email, phone, or in-person	Physical
Transportation Planning and Engineering Services	250 Hamilton Ave	Collect data and feedback or roadway safety and operation decisions, Review traffic control plans submitted for private and public construction projects	Physical/Web
Safe Routes to School	250 Hamilton Ave	Manage and monitor Safe Routes to School Program, Distribute Walk n' Roll maps, Educate students on alternative modes of Transportation to school through school events and related activities, Provide program data and educational resources online	Physical/Web
East Palo Alto Caltrain Shuttle	Scofield Ave	Shuttle services between East Palo Alto Caltrain and Woodland Neighborhood Scofield Ave	Physical
Caltrain Shuttle	425 Hamilton	Shuttle services between East Palo Alto Caltrain Shuttle and InnVision Ministry Food Bank	Physical
Caltrain Shuttle	Palo Alto City Hall	Shuttle services between East Palo Alto Caltrain and Palo Alto City Hall	Physical
Caltrain Shuttle	Alma and University	East Palo Alto Caltrain Shuttle to Palo Alto Caltrain Station	Physical
Caltrain Shuttle	University and Middlefield	Shuttle services between East Palo Alto Caltrain and Lytton Gardens Senior Center	

FIRE DEPARTMENT			
Fire Prevention and Suppression	Various fire stations across Palo Alto	Perform code enforcement functions, Inspect and perform plan review, Visit schools to perform inspections, Perform fire station inspections and meet with staff, Provide public education and training	Physical
LEGISLATIVE DEPARTMENTS			
City Manager's Office	250 Hamilton Avenue	Hold Citizens Academy, Hold committee meetings, Produce press releases and articles, Provide information over the counter, Take feedback from the City website, Manage social media for City (Twitter, Facebook, Nextdoor, etc.)	Physical
City Council and Chambers	250 Hamilton Avenue	Hold council and other public meetings, Hold "State of the City Addresses"	Physical
Clerk Services	250 Hamilton Avenue	Clerk Council and Council Standing Committee Meetings, Produce and publish Council and Council Standing, Committee Agenda Packets, Provide Public Noticing, Process and coordinate Public Records Requests, Coordinate with County Registrar of Voters for City Elections, Maintenance of Municipal Code, Oversee Board & Commission vacancy and appointment process, Hold Administrative Hearings, Receive summons, subpoenas & complaint claims, Certification of Life for Foreign Citizens, Hold Appeal Hearings, Process Ceremonial Document Requests, Provides public access to various types of public records, Coordinate meetings with the public and council members, School tours	Physical and Web
COMMUNITY SERVICES DEPARTMENT			
Recreation	Service	Provide recreation classes, sports leagues, Provide pre-school and after-school programs, Administer park & facility rentals	Physical
Parks	Service	Volunteer restoration programs; Nature interpretive programs, Ranger patrol services, Open Space and Park maintenance	Physical

		services; Irrigation management and repair; Community Garden Program; Golf course and cafe management	
Housing Services	250 Hamilton Ave	Administer Below Market Rate (BMR) programs through Palo Alto Housing, Respond to inquiries over the counter, Publish information on City website, Provide social services and/or other direct support to individuals and households in need of assistance, Assist businesses and organizations with small business loans, facade improvements, and other initiatives, Assist in improving public facilities and infrastructure, Assist those with housing rehabilitation improvements of single and multi-unit housing	Physical
Public Art Program Services	Various locations	Organize artist talks and public art openings, Installation of public temporary and permanent art	Physical
POLICE DEPARTMENT			
Operations	275 Forest Avenue	Provide animal control services, Provide patrol services, Code enforcement, Traffic enforcement	Physical
Support Services	275 Forest Avenue	Perform investigations, Process evidence, Undercover task force, Provide information over the counter, School resource officer program	Physical
Administration	275 Forest Avenue	Professional standard unit, Police/fire volunteer program, Office of the Chief, Crime prevention & neighborhood watch	Physical
Office of Emergency Services	275 Forest Avenue	Hazardous Communication Program, Emergency Action Plan, Prohibition of Violence in the Workplace, Provide public preparedness information to the whole community, Prepare emergency plans for individuals & families, businesses, schools, faith communities, and seniors, manage and oversee Palo Alto Emergency Services Volunteer Program, Community Emergency Response Team, and Block Preparedness Coordinators, Administer emergency alerts and public warnings by phone, email, and text	Physical/Web

ADMINISTRATIVE SERVICES DEPARTMENT			
Administrative Services	250 Hamilton Avenue	Support the City during emergency response plans such as administering the City's credit cards and cash management, Claim processing (damage to private/personal property/City property) if financial liability is associated with claim, Publish financial documents on City Website, Produce physical copies of financial documents and distribute to City libraries for public access, Property surplus/disposal, Manage grant work, loans of City funds, and gifts to the City, Budget and investment policies and processes, TDR sales, Setting municipal fees, cost recovery level policies, debt policies, etc.	Physical/Web
Real Estate Services	250 Hamilton Avenue	Real estate transactions, Oversee use of City land/facilities such as easements and leases	Physical
Revenue Collections Counter	250 Hamilton Avenue	Public parking and parking permits (hourly and monthly), Collection of cash and payments to the City, Perform financial transactions and provide information over the counter, Issue and manage Residential Parking Permit Program	Physical
Purchasing Public Counter	250 Hamilton Ave	Respond to requests for services, Purchasing of hardcopy bid documents, Hold pre-bid meetings with contractors, Administer contracts for goods and services utilized by the City, Oversee bid process	Physical/Web
Finance	250 Hamilton Avenue	Provide information over the counter, Publish financial documents on city website	Physical
Administration	250 Hamilton Avenue	Provide information over the counter, Perform fire/life safety prevention inspections	Physical
HUMAN RESOURCES DEPARTMENT			
Human Resources Services	250 Hamilton Ave	Oversee Recruitment including website advertisement, interviews, testing, etc.	Physical and Web
INFORMATION TECHNOLOGY			
IT	250 Hamilton Avenue	Maintain City Website	Physical

OTHER FACILITIES			
JLS Preschool	480 E Meadow Dr Palo Alto, CA 94306	JLS Private Swim, JLS Preschool Swim, public swimming	Physical
Arastradero Preserve Gateway Facility and Preserve	1530 Arastradero Rd.	Wildlife Camp classes, interpretive center, trails	Physical
Baylands, Athletic Center and Preserve	1775-2774 Embarcadero Rd., 1900 Geng Rd.	Trails, Adult Softball/Baylands Athletic Center, Bay Camps/Baylands Athletic Center, interpretive center, Bike Ride with a Ranger program	Physical
Cowper / Hamilton Lot H	530 Cowper St.	Public parking	Physical
Lytton / Waverley Lot K	351 Lytton Ave.	Public parking	Physical
Emerson / Lytton Lot A	401 Ramona St.	Public parking	Physical
Hamilton / Waverley Lot D	375 Hamilton Ave.	Public parking	Physical
Ventura Community Center	3990 Ventura Ct.	Playground, benches, accessible swings, an irrigated field, fenced community garden and new asphalt basketball courts. Classes include Freshman Leadership Corps, Sojourner Truth Infant-Toddler Program and After-school program	Physical
Bol Park	3590 Laguna Ave	Bike path, children's play area and a multi-use trail	Physical
Children's Library	1275 Harriet St.	Library services, Children's area with play area, toys, and computers, Children's programming including story times, family programs, specialty story times, Desktop computers, Photocopier, printer, Book clubs, Storytime's, Specialty programs, Paws to read (read aloud to therapy dogs), Writing program, LEGO building activity	Physical
Children's Theater & Girl Scouts Building	1305 Middlefield Rd.	Theaters (indoor and outdoor), backstage dressing areas, classroom space, dance studio, Camp Kinetic, Classes or Camps for Theatre and Acting /Children's Theatre (CHT). Girl Scouts building not in use	Physical
College Terrace Library	2300 Wellesley St.	Library services, meeting rooms, children's' reading hour	Physical

Cubberley Community Center	4000 Middlefield Rd.	Ball & Roller Self-Help, Princess Ballet, Hip Hop for Kids!, Dance Fever, Shape it UP!, Prince & Princess Camp dance lessons, Children's Theatre Kid's Combo Dance, Let's Dance Together. Princess Ballet, Family & Kids Capoeira, Energy River Yoga / CUBB, Volleyball, Basketball Camp, Adult Basketball, Total Healthy Back, Argentine Tango lessons	Physical
Gilman / Waverley Lot G	643 Gilman St.	Public Parking	Physical
Gilman / Bryant Lot E	642 Gilman St.	Public Parking	Physical
Emerson / High Lot O	460 Emerson St.	Public Parking	Physical
Ramona/Lyttton Lot C	451 Ramona St.	Public Parking	Physical
Boulware Park	410 Fernando Ave	Playgrounds, a basketball court, two picnic areas with barbecues, benches and a perimeter path	Physical
Bowden Park	Alma Street at North California Avenue	Playground, intimate seating areas, ornamental plantings, a central lawn area and public art sculptures	Physical
Downtown Library	270 Forest Ave.	Library services, Children's area with play area, toys, and computers, Desktop computers, Photocopier, printer, scanner, Loaner laptop, Chromebook, Storytime, Specialty programs, 3D printing, "Magic the Gathering" Saturdays	Physical
Bowling Green Park / (Lawn Bowling - 1992 TP)	474 Embarcadero Road	Lawn bowling, including courses such as introduction to Lawn Bowling	Physical
Byxbee Park and Restrooms	2375 - 2380 Embarcadero Road	Hiking, dog walking, toilet rooms and drinking fountain, off-street parking, Bike Ride with a Ranger program	Physical
Firestation #1 (University Park)	301 Alma St.	Polling station, movie night	Physical
Firestation #2 (Mayfield)	2675 Hanover St.	Polling station, movie night	Physical
Firestation #3 (Rinconada)	799 Embarcadero Rd.	Polling station, movie night	Physical
Firestation #4 (Mitchell Park)	3600 Embarcadero Rd.	Polling station, movie night	Physical
Firestation #5 (Arastradero)	600 Arastradero Rd.	Polling station, movie night	Physical
Firestation #8 (Foothills Park)	3300 Page Mill Rd.	Polling station, movie night	Physical
High / Hamilton Lot P	551 High St.	Public Parking	Physical

Emerson / Ramona Lot N	539 Emerson St.	Public Parking	Physical
Florence / Lytton Lot F	415 Florence St.	Public Parking	Physical
Lytton / Kipling Lot T	450 Lytton Ave.	Public Parking	Physical
Gamble Garden Center	1431 Waverley St.	Meeting rooms, classrooms in carriage house and garden, rentals for public gatherings such as weddings and similar events, horticultural center, pathways, parking and historic Gamble House and patio, which can be rented for events	Physical
Golf Course	1875 Embarcadero Rd.	18-hole golf course, driving range and putting green, public lessons and play	Physical
Parking Garage Lot B		Public Parking	Physical
Mid-Town Parking Lot		Public Parking	Physical
Greer Park and Restrooms	1098 Amarillo Ave.	Athletic fields, a small dog park, Kidz Love Soccer program, and the City's only skate park	Physical
Green Waste Facility	2000 Geng Rd.	Provides location where the public can drop off items for garbage, recycling, composting and construction waste, and obtain information on the programs	Physical
Hoover Park and Restrooms	2901 Cowper St.	Open turf areas, two children's playgrounds, a fenced youth baseball field with bleachers, two tennis courts, a backboard, three handball courts, a picnic area, benches, a multi-purpose concrete bowl with two basketball hoops, a pathway around park, a fenced dog run, and small restrooms. The redwood grove is a unique feature with boulders and a mulched swale running through it. Climbable art was added recently using neighborhood input	Physical
Briones Park and Restrooms (Juana Briones Park)	609 Maybell Ave. (Arastradero at Clemo Ave.)	Play areas, basketball court, picnic tables, benches, a large unprogrammed E-class field, and a restroom	Physical
Cameron Park	2101 Wellesley Street	Large green open space, playground, and picnic area	Physical
Esther Clark Park	Old Adobe Rd off of Arastradero Rd	Small, undeveloped nature reserve of grassland and oaks providing hiking trails	Physical
Cogswell Plaza	264 Lytton Ave	Downtown plaza with a wide path, seating areas, an open lawn area, and a canopied tree area for	Physical

		shady relaxation	
Junior Museum & Zoo	1451 Middlefield Rd.	Under construction. Temporary museum has science exhibits and small animals on display	Physical
Landfill Facility	2380 Embarcadero Rd.	Former landfill converted to hiking trails with public parking	Physical
California Avenue BD Lot 6	250 Sherman Ave.	Public Parking	Physical
California Avenue BD Lot 2	370 Cambridge Ave.	Public Parking	Physical
California Avenue BD Lot 7	350 Sherman Ave.	Public Parking	Physical
California Avenue BD Lot 4	391 Cambridge Ave.	Public Parking	Physical
California Avenue BD Lot 3	275 Cambridge Ave.	Public Parking	Physical
California Avenue BD Lot 8	450 Sherman Ave.	Public Parking	Physical
California Avenue BD Lot 1	276 Cambridge Ave.	Public Parking	Physical
California Avenue BD Lot 9	2350 Birch St.	Public Parking	Physical
Lucie Stern Community Center	1305 Middlefield Rd.	Classrooms, community rooms, theater, ballroom, Camp Palo Alto for Preschoolers, Zumba classes, Foothills Day Camp, Foothills Fun Camp, and Heartfulness Meditation programs	Physical
Mitchell Park Library	3700 Middlefield Rd.	Library services, Children's area with play area, toys, computers, and private study room, Children's programming including storytimes, family programs, bilingual/specialty storytimes, Desktop computers, Dedicated tech lab, Photocopier, printer, scanner, Loaner laptop, Chromebooks, Dedicated Teen Room and teen programming, Book clubs, ESL Conversation Group, Tech Tutoring, Bay Area Quiz Club, Fiber Arts Workshop, Weekly knitting group, Coding program, Robot technology, Writing program, Specialty programs, Vintage Media Lab, 'Medicare mysteries Solved!' program	Physical

Mitchell Park Community Center	3700 Middlefield Rd. and 600 E. Meadow Dr.	Ballroom, multiple meeting rooms, Digital Art for Kinders, Stop Motion Animation for Kids, Photography and Digital Productions Classes, Common Core Writing: Journalism, Debate & Math Olympiad, Debate/Critical Thinking courses, Introduction to Java using Minecraft, LEGO® Star Wars, Dog park, Tennis, Analytical Robotics EV3 Programming, Foothills Adventure/Mitchell Park Teen Center and multiple toilet rooms	Physical
Cambridge Parking Garage (Lot 5)	400 Cambridge St.	Public Parking	Physical
El Camino Park, Restrooms, and Scorekeeper Facility	100 El Camino Real	Open fields for soccer, lighted softball diamond with bleachers	Physical
Eleanor Pardee Park	851 Center Drive	Play areas, picnic area with barbecues, multipurpose concrete bowl, jogging/walking path, community vegetable gardens, youth soccer and little league	Physical
El Palo Alto Park	117 Palo Alto Avenue	Home to the historic El Palo Alto tree, hiking trail, and picnic areas	Physical
Foothills Park	3300 Page Mill Rd.	Canoe float on Boronda Lake, camping, fishing with a range	Physical
Municipal Service Center (MSC)	3201 - 3241 E Bayshore Rd., (Propane Fuel Canopy & UCC/SCADA)	Provides location where the public can obtain information from the following departments: Police, Fire, Emergency Services, Public Works, Utilities, Community Services and Administration Departments. Off-street parking is provided at the entrance gate.	Physical
Palo Alto Airport Terminal Building	1925 Embarcadero Rd.	Aviation facility where private companies provide air transport and flying lessons	Physical
Parking Garage - Lot J (Cowper/Webster)	520 Webster St.	Public Parking	Physical
Heritage Park	300 Homer Ave	Open lawn, picnic area, children's playground with unique features, pathways and benches	Physical
Hopkins Creekside Park	Palo Alto Avenue	Park provides a protected green space along San Francisquito Creek with 2 small pocket parks, picnic tables and benches	Physical

Rinconada Library	1213 Newell Rd.	Library services, Children's area with play area, toys, computers, and private study room, Desktop computers, Dedicated tech lab, Photocopier, printer, scanner, Loaner laptop, Chromebook, Dedicated Teen Room and teen programming, Book clubs, Tech Tutoring, Tai Chi classes, Teen writing club, Silver Screen Movie Mornings, Specialty programs, 3D printing, Saturday Board Game day	Physical
Rinconada Park	777 Embarcadero Rd.	Open grassy areas, two children's playgrounds, nine tennis courts (six with lights), a backboard, picnic areas with barbecues and one group area, a municipal swimming pool and children's pool, a redwood grove, a multipurpose concrete bowl, benches, a jogging/walking path, restrooms and a "Magic Forest" of mature trees along Hopkins Ave	Physical
Seale Park and Restrooms	3100 Stockton Place	Children's playground, a circular sand pit with concrete turtles, E-class playing fields, a basketball hoop, shaded picnic areas, benches, pathways and a newer toilet room building	Physical
Parking Garage - Lot Q (under residential)	430 High St.	Public Parking	Physical
Parking Garage - Lot R (High Street)	528 High St.	Public Parking	Physical
Johnson Park	Everett and Waverley	Community garden, sand volleyball, half-court basketball court, large playground and walkways with benches	Physical
Kellog Park	Waverly at Embarcadero Road	Small park with walkwalks, two benches and an off-street parking lot shared with Gamble Center	Physical
Mayfield Park	2300 Wellesley Street	Green space with benches and walkways at Mayfield Branch Library and the Children's Center	Physical
Stanford - Palo Alto Playing Fields and Restrooms	2700 El Camino Real	A-class sport facility with two artificial turf playing fields, bioswales, snack shack, public art, and on-site parking	Physical
Monroe Park	Monroe and Miller Avenue	Open and mounded grassy area, path, sand area with two swings	Physical
Peers Park, Clubhouse and Restrooms	1899 Park Ave.	Two tennis courts, picnic tables, two children's play areas, basketball court, field house and restrooms. A Day at Little	Physical

		Explorers children's' program in clubhouse.	
Animal Services	3281 E. Bayshore Rd.	Palo Alto Animal Services	Physical
Art Center	1313 Newell Rd.	Ceramics Classes /Ceramics Studio and Ceramics Classroom	Physical
Ramos Park	800 East Meadow Dr	Large open grassy area, children's playground, picnic area with barbecues, benches, path around park, multi-purpose concrete slab with a basketball hoop.	Physical
Parking Garage - Lot S/L (Bryant Street)	445 Bryant St.	Public Parking	Physical
Robles Park	4116 Park Boulevard	Two children's playgrounds (wheelchair accessible toddler swings), two picnic areas (one shaded by wisteria-covered arbors), barbecues, benches, multipurpose bowl with colorful tile art, basketball court, softball backstop, footpath	Physical
Scott Park	Scott Street at Channing Avenue	Basketball hoop, mini children's playground, benches, picnic tables	Physical
Water Quality Control Plant	2501 Embarcadero Way	Public tours, classroom space, off-street parking	Physical
Williams House	351 Homer Ave.	Houses the Museum of American Heritage	Physical
Winter Lodge (Community Skating - 1992 TP)	3005 Middlefield Rd.	Ice Skating (lessons and public use)	Physical
Ted Thompson Parking Garage	275 Cambridge St.	Public Parking	Physical
Terman Park	655 Arastradero Road	2 soccer fields, softball diamond, 4 basketball courts, 2 tennis courts, perimeter walking/jogging path	Physical
Sarah Wallis Park	202 Ask Street at Grant Avenue	Walkways, benches and public art ("Tangents to L2")	Physical
Weisshaar Park	2300 Dartmouth Street	A large, green open field and the only tennis courts in the College Terrace neighborhood, benches and a picnic table	Physical
Werry Park	2100 Dartmouth Street	Children's playground, walkways and picnic table	Physical

Program Accessibility is being determined for city programs, services and activities that take place in City facilities through Phase 1 & 2 of this ADA Transition Plan process (please see Appendix A for details on phasing). As part of the public outreach process, SZS has assisted the City of Palo Alto in formulating, circulating and reviewing voluntary questionnaires.

The questionnaires are one way of fulfilling an ADA requirement to solicit public opinion about City of Palo Alto facilities from the general public, persons with disabilities that use the facilities as well as City staff and supervisors. The questionnaire is provided below and the responses are provided in Appendix A.

10. RECOMMENDED CHANGES TO POLICIES AND PRACTICES

The most significant task that an ADA Self-Evaluation is required to perform is that of reviewing and evaluating the existing policies and procedures. This is done in order to identify policies and procedures that may be discriminatory or to identify areas in which policies and procedures are lacking. That information must be correlated with the physical barrier data to ascertain where program accessibility can be applied through the development of new policies and procedures to improve access for persons with disabilities.

During the field investigations, observations were made in several facilities that lead our team to develop recommended policies and practices intended to improve access to the facilities for people with disabilities. These recommended policies and practices are provided below and can be applied to other City facilities that provide essential services or represent the single location in the City where such programs, services or activities are provided.

Palo Alto City - Civic Center

1. **Police Station:**
    a. <u>After-hours Access:</u> People may have reason to visit the police station at any time, day or night, by choice or otherwise. The main exterior entrance to the police station is located on the south side of the Civic Center at the top of a stairway, where no vertical access is provided. Staff is only available by phone from the breezeway on the south side of the building at the top of the stairs near the covered entrance. People with mobility impairments who require an accessible route must travel through the Civic Center building from the underground parking lot or around the building where severe cross slopes exist.

    The accessible route through the building is the only accessible route to the police station, but this route is closed on the weekend

and evenings (during non-business hours) which prevents people with disabilities from accessing the police station. When the Civic Center building is closed, the existing accessible route that bypasses the stairway and utilizes the building interior space will not be available for use.

1) Develop a policy or practice to allow access to the police station during all hours for people with disabilities, as is the case for people who do not have mobility impairments.

   This policy or practice may include the provision of a security phone on the sidewalk along Forest Avenue at the bottom of the stairway. Provide a form of vertical access such as a wheelchair lift, or a route of travel around the building that is accessible along Forest Avenue, Bryant or Ramona Avenue and to the midpoint on Hamilton Avenue where pedestrians can travel up the King Plaza to reach the accessible entrance on the north side of the Civic Center.

b. Police Vehicles: According to information provided by City staff from the police department, no wheelchair accessible police vehicle is available to transport people to the department.

   1) Obtain wheelchair accessible vehicles for police use.

c. Police Intake: All intake areas are located on the lower level and no elevator or other form of vertical access is provided, thereby preventing disabled visitors, legal counsel, etc. from reaching people in the intake or holding area. No accessible route exists from the point of arrival for people brought to the intake area to the interview room, toilet room, or holding cells.

   1) Alter facility to provide wheelchair access, including vertical access where required to administer the programs.

2. **Parking Garage - Emergency Egress.** The underground parking structure was constructed prior to the enforcement of the ADA and lacks an accessible route for pedestrians who park in accessible parking. The existing pedestrian path to the existing sidewalk travels by way of a steep ramp on each side of the vehicular ingress paths from Ramona and Bryant Avenue. Accessible parking is provided on each level near elevators, but no accessible emergency egress route exists from accessible parking to the ground level public way.

a. Develop policies or practices to ensure that the evacuation of people with disabilities who use the garage takes place, and train staff to implement the policy consistently.

3. **City Council Chambers - Conference Room** – Conference tables lack accessible knee clearance in all locations other than the head of the table. The end of the table across from the exit door lacks maneuvering clearance required for wheelchair use.

    a. Develop a policy to ensure that people using wheelchairs are given a seat at the head of the table and train staff to implement the policy consistently.

4. **Elevators**. Emergency call systems in elevators function for people who are not speech or hearing impaired. The red lights that are intended to illuminate when a call is answered do not work consistently. At present, the personnel who answer calls have a policy to hang up if the person who activates the emergency system does not speak to them.

    a. Develop a policy to answer silent calls in conjunction with the call center that answers the emergency communication system calls.

Arastradero Gateway Facility

1. **Toilet Room with Shower**: Accessible unisex toilet rooms have showers in a configuration that does not provide a separation between the shower and other toilet room fixtures. When the shower seat is in a position for use, the seat blocks required clear floor space at the lavatory. If the seat is left in that position routinely, people using mobility assist devices may not be able to use the lavatory.

    a. Develop a policy and practice to inform users of this design issue so that they can fold the seat up after use to ensure that the shower seat remains in an upright position where the lavatory remains accessible to people using wheelchairs. Signage informing users of the issue involved may be adequate for this purpose.

Cubberly Community Center

1. **Emergency Call Stations**. These systems function for people who are not speech impaired. The red lights that are intended to illuminate when a call is answered do not work consistently. At present, the personnel

who answer calls have a policy to hang up if the person who activates the emergency system does not speak to them.

a. Develop a policy to answer silent calls in conjunction with the call center that answers the emergency communication system calls.

Fire Station #1 – University

1. **Accessible Parking**: Garbage pickup day results in trash receptacle being left in the accessible stall aisle preventing use.

    a. Change this existing practice to ensure that the accessible stall is usable every day of the week and train staff to implement the policy consistently.

Rinconcada Pool

1. **Dressing Rooms:** No area is provided for dressing for people with a disability who are accompanied by a companion or assistant of a different sex. During the public outreach process, the City was made aware that several parents with children who have developmental disabilities were turned away from the pool because they were accompanied by caretakers of the opposite sex. The parents indicated that they were initially told that a separate tent would be set up for their use outside the following week, but this accommodation did not appear. The facility is owned by the City, but operated by a private contractor.

    a. Review policies and practices that contractors providing services on behalf of the City provide to ensure that they do not discriminate against people with disabilites. Provide separate dressing areas at the pool and similar facilities where people with disabilities who have caretakers who are of a different gender are able to enter the dressing area and care for the person who has a right to access the program or activity provided.

Golf Course

1. **Website.** Reservations can be made online but the website is not accessible.

    a. Develop an accessible website and provide accessible reservations online.

2. **Practice Bunker.** Bunker is not usable for people with mobility impairments who play using a single rider (accessible) golf carts because current policy prohibits carts from entering the practice bunker.

a. Change the existing policy to allow single rider carts to enter the practice bunker, or provide the same practice experience in an alternate location.

3. **Passenger Loading Zone.** Path of travel from accessible parking and loading zone is not accessible due to the steep slope.

    a. Until alterations are made to provide an accessible passenger loading zone, consider creating a practice to provide cart service from these locations to the Pro Shop, Café and other areas, as needed. Train staff to implement the policy consistently.

These recommendations will apply to other facilities where similar activities take place.

11. ADA/CBC TOOLKIT

The ADA/CBC Tool Kit was adapted from the US DOJ toolkit to include California requirements to ensure that this process covers both state and federal requirements when evaluating City policies and practices. The ADA/CBC Tool Kit is comprised of the following sections:

A. **ADA Coordinator Checklist:** This Checklist helps to determine if agencies are in compliance with basic ADA administrative requirements. It also includes a sample “ADA Notice” that agencies can adapt for their use in complying with basic ADA administrative requirements.

B. **General Effective Communication Requirements under Title II of the ADA:** This Checklist explains what it means for communication to be “effective,” which auxiliary aids and services can potentially provide effective communication, and when those auxiliary aids and services must be provided.

C. **9-1-1 and Emergency Communications Services**: This Checklist explains how the ADA’s effective communication requirements apply to 9-1-1 and emergency communications services. It also assists the agency in identifying common accessibility problems with their 9-1-1 and emergency communications services.

D. **Website Accessibility:** This Checklist explains how Title II of the ADA applies to state and local government websites, describes technologies people with disabilities use to access the Internet, discusses website design practices that pose barriers to people with disabilities, and identifies solutions that can eliminate these online barriers.

E. **Physical Accessibility:** This Checklist explains Title II's requirements for providing accessible routes from building entrances to accessible parking and the public rights or way including curb ramps at pedestrian crossings.

F. **General Emergency Management:** This Checklist explains Title II's requirements for providing emergency policies and procedures. The Checklist can also be used to review existing policies and services for evacuation, training of first responders and emergency shelter management.

The following information was obtained from City staff input and participation in this process. It will remain the discretion of the City of Palo Alto to develop new City policies and procedures to fulfill these minimum requirements.

A. ADA Coordinator Checklist

1) Policies and Procedures:

- There *is* an ADA Coordinator who investigates all complaints communicated to the government alleging that the government does not comply with the ADA.

- The ADA Coordinator may *not* have the time and expertise necessary to coordinate the government's efforts to comply with and carry out its responsibilities under the ADA.

  Recommendation:

  Establish policy to standardize investigation of all complaints. If ADA Coordinator is not responsible, determine who will be responsible.

2) ADA Public Notice:

- The City *does* provide information that is available to the general public regarding the fact that the ADA applies to the services, programs and activities of the government, but the City does *not* use the Department of Justice's model "Notice under the Americans with Disabilities Act" or a similarly comprehensive notice.

- The City does *not* post this information in public areas or make it available in other ways as deemed necessary by the City administration to inform people of the protections of the ADA.

- ADA notice is *not* in available alternate formats – i.e., large print, Braille, audio format, accessible electronic format (e.g., via email, in HTML format on its website).

  Recommendation:
  Establish policy to post notice to inform people of the protections of the ADA in public locations and to provide the notice in alternate formats.

3) Grievance Procedures:

- The City does have a grievance procedure, but it does not use the Department of Justice's model "Grievance Procedure under the Americans with Disability Act" or a similarly comprehensive grievance procedure.

- The City does not have the grievance procedure available in alternate formats.

  Recommendation:
  Establish policy to provide the City grievance procedure in alternate formats. Where the grievance procedure is made available in alternate formats, preferably several such as versions in min. 18 font "large print", or an audible file on a flash drive or digital storage device that can be mailed or picked up, or Braille, and an HTML web version that is available 24/7 on the City's website. Where these alternate formats are produced and ready for daily use, requests can be promptly fulfilled.

B. General Effective Communication Requirements

1) Interpreters (Sign Language, Oral, and Cued Speech)

- The City does *not* have policies or procedures in place to deal with requests from the general public for sign language, oral, and cued speech interpreters.

  Recommendation:
  Establish policy to provide interpreting services for the General Services department for public meetings.

- The City does *not* have employees on staff who are qualified interpreters and does not have arrangements with one or more vendors to provide interpreting services when needed.

- The City does *not* have employees, who interact with the public, that have been trained on the correct procedures to follow when a person requests an interpreter.

  Recommendation:
  Establish policy to train City Hall staff who interact with the public on the correct procedures to follow when a person requests an interpreter.

2) Other Auxiliary Aids and Services:

- The City does *not* have policies and procedures in place to deal with requests from the general public for note-takers, computer-assisted real-time transcription services, and other auxiliary aids and services for providing effective communication.

  Recommendations:
  1) *Establish policy and procedure to handle requests from the general public for notetakers, computer-assisted real-time transcription services, and other auxiliary aids and services for providing effective communication.*
  2) *Develop procedures for regular testing of the equipment and training of staff on the use of the auxiliary aids and services.*

- The City does *not* have the equipment or arrangements with vendors so that it can provide written materials in alternative formats for the equipment or devices that they provide (e.g. Braille, large print, audio format, electronic format). They are handled case by case by each department individually.

  Recommendation:
  Establish policy or practice with vendor or in-house expertise to provide written materials in alternative formats for documentation, equipment or devices that the City provides.

- The City does *not* give primary consideration to the requests of the person with a disability when determining what type of auxiliary aid or service to provide.

  Recommendation:
  Establish practice to give primary consideration to the type of request made when determining what kind of aid or service to provide.

- The City does *not* ensure that all videos and television programs it produces and all videos it makes available to the public on its internet website are available with captioning and audio description.

  Recommendation:
  Establish practice to ensure that all videos and television programs produced are made available to the public on its internet website are available with captioning and audio description.

3) TTYs (Teletypewriters):

- TTYs are *not* available for the people with hearing and speech disabilities.

  Recommendations:
  1) *Establish policy or practice to make TTY's available for the people with hearing and speech disabilities.*
  2) *Train City staff to use the California TTY relay system.*

C. 9-1-1 and Emergency Communications Services

This checklist was completed, and no additional policies were identified as recommended.

D. Website Accessibility Management

1) Assessing Current Webpage and Content on the City Website:

- City website pages lack navigation links with a "skip navigation" link at the top of each webpage.

  Recommendation:
  Establish practice to provide a link at the top of each webpage that allows users to "skip navigation" to provide website accessibility.

- On City website online forms, the City's links do *not* have a text description that can be read by a screen reader (not including graphics or "click here").

  Recommendation:
  Add text descriptions to website.

- On City website online forms, the City's HTML tags do *not* describe all of the controls (including all text fields, check boxes, drop-down lists, and buttons) that people can use in order to complete and submit the forms.

  Recommendation:
  Establish practice to describe all of the controls including all text fields, check boxes, drop-down lists, and buttons so that forms can be completed and submitted.

- On City website online forms, all of the photographs, maps, graphics and other images does *not* currently have HTML tags (such as 'alt' tag or a long description tag) with text equivalents of the material being visually conveyed.

  Recommendation:
  Establish practice to provide HTML tags for all photographs, maps, graphics and other images with text equivalents of the material being visually conveyed.

- On City website online forms, the City's documents are *not* available in HTML or another text-based format such as rich text format (RTF), Portable Document Format (PDF) or word processing format.

  Recommendation:
  Establish practice to provide City documents in HTML or another text-based format.

- On City website online forms, the City's default setting in drop-down lists does *not* describe the information being requested instead of displaying a response option (e.g., "your age" instead of"18-21").

  Recommendation:
  Establish practice to provide default settings for drop-down lists that describe information, not display response options.

- On City webpage's data charts or tables, the City's HTML is *not* used to associate all data cells with column and row identifiers.

  Recommendation:
  Establish practice to use HTML to associate all data cells with column and row identifiers.

- All video files on the City website do *not* have audio descriptions of what is being displayed to provide access to visually conveyed information for people who are blind or have low vision.

<u>Recommendation:</u>
Establish practice to provide audio descriptions of what is being displayed to provide access to visually conveyed information.

- All video *and* audio files on the City website do *not* have written caption of spoken communication synchronized with the action to provide access to people who are deaf or hard of hearing.

  <u>Recommendation:</u>
  Establish practice to provide video and audio files with written caption of spoken communication synchronized with the action shown.

2) Website Accessibility Policy and Procedures:

- The City does *not* have a written policy on website accessibility

  - Due to this lack of a policy, the City has no website accessibility policy posted on their website in a place where it can be easily located.

    <u>Recommendation:</u>
    Establish a written policy defining website accessibility for the City and post policy on City website in a location that is easily located. Make necessary changes to city website to provide access for people with disabilities.

- The City's website accessibility policy is not in a place where it can be easily located.

- The City's procedures have not been developed to ensure that content is not added to the City website until it has been made accessible.

  <u>Recommendation:</u>
  Move the City's website accessibility policy to a place where it is easily located. Develop procedures to ensure that content is not added to the City website until it has been made accessible.

- The webmaster only checks images to make sure the alternate tags are added; however the webmaster does not check the HTML of all new webpages to confirm accessibility before the pages are posted.

  <u>Recommendation:</u>
  Develop procedures to ensure that webmaster checks images to make sure the alternate tags are added and the HTML of all new webpages to confirm accessibility before the pages are posted.

- For documents that are added to the City's website in PDF format, the text-based versions of the documents such as HTML, RTF, or word processing format are not added at the same time as the PDF versions.

  Recommendation:
  Develop procedures to ensure that text-based versions of all PDF documents are added to the City website at the same time that the PDF versions are added.

- In-house staff and contractors have not received information about the website accessibility policy and procedures to ensure website accessibility.

  Recommendation:
  Provide training to in-house and contractor staff on how to ensure the accessibility of the website. This training should be an on-going task as documentation intended to be posted to the website is being produced constantly by various departments.

- A specific written plan is not including timeframes in place now to make all of their existing web content accessible.

  Recommendation:
  Establish a written plan including timeframes now to make all of the City's existing web content accessible.

- The City have not posted on their website a plan to improve website accessibility and invited suggestions for improvements.

  Recommendation:
  Post a public statement of commitment to improve website accessibility and invited suggestions for improvements.

- The City's website home page does not include easily locatable information, including a telephone number and email address, for use in reporting website accessibility problems and requesting accessible services and information.

  Recommendation:
  Contact information for the ADA Coordinator should be made readily available in an accessible (HTML) format on the City website. The practice of the ADA Coordinator should be to forward all IT/website concerns to the IT department who work directly with website issues.

- In-house and contractor staff who create web content or post it on their website have not received copies of the Department of Justice's technical assistance document "Accessibility of State and Local Government Websites to People with Disabilities".

  Recommendation:
  Establish a policy to inform and train staff and contractors who post information on City website to ensure that they understand and implement City accessibility policy and procedures. Also, provide DOJ technical assistance documents to staff, when appropriate.

- The City has not asked disability groups representing people with a wide variety of disabilities to provide feedback on the accessibility of their website.

  Recommendation:
  Establish a policy to ask disability groups representing people with a wide variety of disabilities to provide feedback on the accessibility of the City website. Provide easily locatable information, including a telephone number and email address, for use in reporting website accessibility problems and requesting accessible services.

- The City has tested their website using one of the products available on the Internet to test website accessibility.

- Alternative ways of accessing web-based information, programs, activities, and services are not available for people with disabilities who cannot use computers.

  Recommendation:
  Establish a policy to provide alternative ways of accessing web-based information, programs, activities, and services are not available for people with disabilities who cannot use computers.

E. Physical Accessibility in City Facilities

1) Evaluating Compliance with the Requirements for Curbs at Pedestrian Crossings:

- All City curbs where sidewalks and walkways intersect with roads, streets, and highways *do not* have curb ramps or blended transitions that allow people with disabilities to go from the sidewalk on one side of the vehicular way across any traffic islands with curbs to the sidewalk on the opposite side.

- The City *has* performed an evaluation of its pre-ADA pedestrian crossings to identify the locations where curb ramps need to be constructed to provide program access for people with disabilities.

- The City *did* seek input from people with disabilities with respect to its plans for the construction and alteration of highways, streets, roads, sidewalks, and pedestrian crossings.

- The City *does* have a mechanism that people with disabilities can use to request the installation or repair of a curb ramp.

The City has developed an ADA Transition Plan for the Public Rights-of-Way (PROW) including all sidewalks, curb ramps and roadways where no sidewalk is provided. The ADA Transition Plan description and schedule for the PROW is provided in Appendix B.

F. Emergency Management

1) General Emergency Management Policies and Procedures:

- The City *does* have written procedures to ensure that they regularly seek and use input from person with a variety of disabilities and organizations with expertise in disability issues in all phases of the City's emergency planning, such as those addressing preparation, notification, evacuation, transportation, sheltering, medical and social services, temporary lodging and/or housing, clean-up, and remediation.

    - The City *does* seek input and participation from people with disabilities and organizations with expertise on disability issues when they City stage emergency simulations and otherwise test their preparedness.

2) Planning for Emergency Notification and Evacuation:

- For planning purposes, the City has *not* determined the extent to which, in an emergency or disaster, people with disabilities who reside or visit their community are likely to need individualized notification, evacuation assistance, and/or transportation, including accessible transportation.

    - The City's emergency planning has *not* identified the resources they will use to meet the needs of individuals with disabilities who require individualized notification, evacuation assistance, and/or transportation, including accessible transportation.

      Recommendation:

Develop procedures to identify people with disabilities who reside or visit their community that are likely to need individualized notification, evacuation assistance, and/or transportation, including accessible transportation.

- Where the City's emergency warning systems use sirens or other audible alerts, the City *does* have written procedures to ensure the use of a combination of methods to provide prompt notification of emergencies to persons who are deaf or hard of hearing.

- The City *does not* address the needs of people with disabilities who will require assistance leaving their homes.

  Recommendation:
  Establish policies and procedures to develop services for people with disabilities who will require assistance leaving their homes.

- The City does *not* have written procedures to ensure that their community evacuation plans enable people with a wide variety of disabilities to safely self-evacuate and, for those who cannot self-evacuate, to receive evacuation assistance.

  Recommendation:
  Establish written procedures to ensure that community evacuation plans enable people with a wide variety of disabilities to safely self-evacuate and, for those who cannot self-evacuate, to receive evacuation assistance.

- The City has *not* established a voluntary, confidential registry for persons with disabilities to request individualized notification, evacuation assistance, and transportation.

  Recommendation:
  Establish a voluntary, confidential registry for persons with disabilities to request individualized notification, evacuation assistance, and transportation.

- The City's emergency transportation plan does *not* identify accessible transportation resources that will be available to evacuate persons with mobility disabilities, including people who use wheelchairs or scooters, people who use medical equipment, such as oxygen tanks, and people who use service animals.

  Recommendation:

Update emergency transportation plan to identify accessible transportation resources that will be available to evacuate persons with mobility disabilities.

- The City's emergency plans, policies, and procedures do *not* provide for people with disabilities to be evacuated and transported to shelters together with their families.

  - The City's emergency management plans, policies, and procedures do *not* ensure that people with disabilities are not separated from their service animals during evacuation and transportation.

    Recommendation:
    Establish emergency plans, policies, and procedures to ensure that people with disabilities are to be evacuated and transported to shelters together with their families and service animals.

3) Training First Responders, Staff, and Volunteers:

- Staff and volunteers who participate in notification activities have *not* been trained as first responders.

  Recommendations:

  Establish policies and procedures to ensure that staff and volunteers who participate in notification activities are trained as first responders in the following categories:

  1) *Staff and volunteers who deal with evacuation, transportation, and emergency-related security issues,*
  2) *Shelter staff and volunteers and those who will be involved in routing people to shelters and deciding shelter placements for people with disabilities and their families,*
  3) *Individuals involved in establishing and operating temporary housing or lodging programs,*
  4) *Individuals who will establish and operate emergency-related medical and social service programs, and*
  5) *Individuals who will be responsible for repair, rebuilding, and continuity of programs operations following an emergency or disasters.*

4) Physical Accessibility in Emergency Shelter Programs:

- The City *has* conducted an accessibility survey of all of their emergency shelter facilities, whether owned by government or a private entity to determine if they comply with the most stringent requirements of the CBC and ADA Standards. The City commented, “Red Cross did the survey”.

    - The City *has not* identified access barriers at any of the shelter facilities.

    - All emergency shelters used by the City do not provide the required accessible features referenced in the following list:

        - Passenger drop off
        - Accessible route from drop-off to shelter location
        - Parking
        - Accessible entrance(s) to shelter location
        - Check-in area
        - Eating area
        - Drinking fountain(s)
        - Medical treatment area
        - Sleeping areas
        - Toilet room(s)
        - Shower(s)

- The City has *not* identified and widely publicized to the public and to persons with disabilities and disability organizations the most accessible emergency shelters and the accessible features that each shelter has.

    <u>Recommendation:</u>
    After an accessibility survey has been completed for the City’s emergency shelter facilities, develop policies and procedures to publicize to the public and to persons with disabilities and disability organizations the most accessible emergency shelters and the accessible features that each shelter has. Consider the role that fire stations play in providing emergency shelter facilities.

- The City *has* adopted policies and procedures to ensure that shelter staff and volunteers maintain accessible routes for individuals who use wheelchairs and other mobility aids.

- The City has *not* adopted procedures to minimize protruding objects and overhead objects in shelters so that someone who is blind or has low vision can walk safely throughout the shelter area.

  <u>Recommendation:</u>
  Conduct an accessibility survey of all of the City's emergency shelter facilities to identify and minimize protruding objects and overhead objects in shelters so that someone who is blind or has low vision can walk safely throughout the shelter.

- The City has *not* adopted policies and procedures for shelter staff and volunteers to offer way finding assistance to people who are blind and those with low vision who may need assistance in understanding and navigating the shelter layout and locating shelter facilities.

  <u>Recommendation:</u>
  Develop and adopted policies and procedures that enable shelter staff and volunteers to offer way finding assistance to people who are blind and those with low vision who may need assistance in understanding and navigating the shelter layout and locating shelter facilities.

- The City *has* established policies and procedures to ensure that, in the future, facilities are surveyed for accessibility and barriers to access are removed before a facility is designated as a shelter.

5) Policies and Procedures in Emergency Shelters:

- The City does *not* have supplies of informational materials routinely handed out at emergency shelters available in alternative formats for people who are blind or have low vision.

  <u>Recommendation:</u>
  Develop alternate formats for informational materials routinely handed out at emergency shelters for people with vision impairments.

- The City *has* adopted policies and procedures for shelter staff and volunteers to provide assistance to people who are blind or have low vision by reading and completing forms and other written materials that are not available in alternative formats.

- The City's shelters *have* low-stimulation "stress-relief zones," such as an empty classroom in a school building that can be used as an emergency shelter.

- The City *has not* adopted policies and procedures to make these areas available on a priority basis to people whose disabilities are aggravated by stress.

  Recommendation:
  Develop and adopted policies and procedures to ensure that shelters have low-stimulation "stress-relief zones available on a priority basis to people whose disabilities are aggravated by stress.

- The City *has* adopted emergency shelter eligibility policies and procedures to ensure that people with disabilities are housed at "mass care" shelters unless they are medically fragile.

- The City *has* adopted "mass care" shelter procedures to ensure that shelter staff and volunteers do not turn away people with disabilities who may need assistance with activities of daily living even though their personal care aides may not be with them.

- The City has *not* adopted policies and procedures to ensure that "mass care," "special needs," and "medical" shelter staff and volunteers are trained and monitored so they provide safe, appropriate assistance with activities of daily living that some people with disabilities may require.

  Recommendation:
  Develop and adopt policies and procedures to ensure that shelter staff and volunteers trained to handle "mass care," "special needs," and "medical" needs are trained and monitored so they provide safe, appropriate assistance with activities of daily living that some people with disabilities may require.

- The City's shelter staff and volunteers have *not* received training with site-specific instructions for providing people with disabilities access to all services, activities, and programs at "mass care," "medical," and "special needs" shelters.

  Recommendation:
  Establish policies and practices for training staff and volunteers with site-specific instructions for providing people with disabilities access to all services, activities, and programs at "mass care," "medical," and "special needs" shelters.

- The City *does* have written policies and procedures to ensure that people who are deaf or hard of hearing, people with speech disabilities, and people who are blind or have low vision are provided with effective communication during their stay at a shelter.

Recommendation:
No recommendation required where City complies.

- The City does *not* provide a TTY at each emergency shelter for use by people who are deaf, are hard of hearing, or have speech disabilities.

  Recommendation:
  Develop policies to provide a TTY or other similar technology at each emergency shelter for use by people who are deaf, are hard of hearing, or have speech disabilities. Consider asking for input on which technologies are useful to people with disabilities in these settings. TTY units may no longer be used by large segments of the population but the California Relay System is widely used. Training on how to ensure that program is accessible should be implemented.

- The City *does* have written procedures to ensure that persons with disabilities who use service animals are not separated from their service animals when using emergency shelters and have full access to shelter programs, services, and activities, even if pets are normally prohibited in shelters or in certain areas of shelters.

  - The City does *not* have written procedures to ensure that food, water, and a receptacle and plastic bags for the disposal of service animal waste are available at emergency shelters.

  - The City has *not* established security procedures at shelters that allow people with service animals to take their animals outside for relief without unnecessary delays for security screening upon re-entry.

    Recommendations:

    Develop and adopt policies, practices and training for shelter staff and volunteers to ensure that persons with disabilities who use service animals are not separated from their service animals when using emergency shelters and have full access to shelter programs, services, and activities, even if pets are normally prohibited in shelters or in certain areas of shelters.

    1) *Establish policies to ensure that food, water, and a receptacle and plastic bags for the disposal of service animal waste are available at emergency shelters.*
    2) *Establish security procedures at shelters that allow people with service animals to take their animals outside for relief without unnecessary delays for security screening upon re-entry.*

- The City's emergency management plan does *not* provide an effective way for people with disabilities to request and receive durable medical equipment and medication while in shelters.

  Recommendation:
  Develop and adopt emergency management plan that provides an effective way for people with disabilities to request and receive durable medical equipment and medication while in shelters.

- The City has *not* established procedures for people with disabilities to request and receive cots or beds, modifications to cots or beds, securement of cots or beds to allow safe transfer to a wheelchair, and placement of cots or beds in specific locations, when needed.

  Recommendation:
  Establish procedures for people with disabilities to ensure that they can request and receive cots or beds or modifications needed to allow safe transfer to a wheelchair, and placement of cots or beds in specific locations when needed. City to ensure that accessible cots with a transfer surface between 17" to 19" is available.

- The City has *not* adopted kitchen access policies to provide immediate access to food and refrigerated medications for shelter residents and volunteers whose disabilities may require it.

  Recommendation:
  Develop and adopt kitchen access policies to provide immediate access to food and refrigerated medications for shelter residents and volunteers whose disabilities may require it.

- The City's emergency management plan does *not* ensure that at least some kinds of foods and beverages are available in emergency shelters for people with dietary restrictions, such as people who have diabetes or severe food allergies.

  Recommendation:
  Develop and adopt emergency management plan ensures that at least some kinds of foods and beverages are available in emergency shelters for people with dietary restrictions, such as people who have diabetes or severe food allergies.

6) Medical and Social Services:

- The City has *not* established policies and procedures to ensure that medical and social services and other benefit programs are accessible to people with disabilities, including people who use wheelchairs, scooters,

and other mobility aids, individuals who cannot leave shelters because of their disabilities, and people who use service animals.

Recommendation:
Establish policies and procedures to ensure that medical and social services and other benefit programs are accessible to people with disabilities.

- The City has *not* established policies and procedures to ensure that application processes for benefit programs are designed so they do not exclude people with disabilities whose disabilities prevent them from using one particular type of application process.

  Recommendation:
  Establish policies and procedures to ensure that application processes for benefit programs are designed so they do not exclude people with disabilities whose disabilities prevent them from using one particular type of application process. Consider the use of alternate formats as part of this process.

- The City does *not* have policies and procedures to ensure that their medical, social service, and other benefit programs provide effective communication to people with disabilities, including people who are deaf or hard of hearing and people who are blind or have low vision.

  Recommendation:
  Establish policies and procedures to ensure that medical, social service, and other benefit programs provide effective communication to people with disabilities.

- The City's policies and procedures do *not* include primary consideration of the communication method preferred by an individual with a disability.

  Recommendation:
  Establish policies and procedures that include primary consideration of the communication method preferred by an individual with a disability.

7) Post-Sheltering Policies and Procedures:

- The City *has* adopted procedures to provide additional time, transportation, and search assistance for people with disabilities in emergency shelters to locate accessible temporary housing and support services in the community following an emergency.

<u>Recommendation:</u>
No recommendation required where City complies.

- The City has *not* adopted a plan for providing prompt, equivalent temporary housing to persons with disabilities, including accessible housing for people who use wheelchairs, scooters, and other mobility aids and people who are deaf or hard of hearing.

  <u>Recommendation:</u>
  Develop and adopt a plan for providing prompt, equivalent temporary housing to persons with disabilities, including accessible housing for people who use wheelchairs, scooters, and other mobility aids and people who are deaf or hard of hearing

8) Post-Emergency Repair, Rebuilding, and Resumption of Programs Operations:

- The City *has* established policies to ensure that programs relocated from a damaged facility on a temporary or permanent basis remain accessible to people with disabilities.

APPENDIX A

CITY OF PALO ALTO

PUBLIC OUTREACH NOTICE
ADA Transition Plan Update

The City of Palo Alto is in the process of updating its current ADA Transition Plan. The updated Plan will be used as a guide for making physical improvements to facilitate accessibility in City Facilities and the public right-of-way for persons with disabilities.

The purpose of the City's ADA Transition Plan is to identify barriers encountered by the disabled in accessing public programs and facilities and to prioritize projects and formulate strategies for transition to a fully accessible City. The City's consultant has finished evaluating all City facilities and has drafted a remediation schedule based on estimated costs, age of a facility, and upcoming or planned Capital Improvement Projects (CIPs). The Plan also outlines a strategy for making improvements considering several factors such as the extent of deficiencies, identified needs, available budget, and a realistic schedule.

The City of Palo Alto would like your input in updating its Transition Plan in regards to any access related deficiencies that you may know of and feedback on prioritization. If any suggestions, comments or specific deficiencies are brought to the City's attention by **June 27, 2019**, they will be evaluated for inclusion in the Plan prior to its adoption by City Council. To include your feedback, please fill out the attached questionnaire or attend one of the three community meetings below. You are free to attend any of the meetings to learn more about the ADA Transition Plan.

Monday, May 13, 2019 **3:30 PM** Embarcadero Room at Rinconada Library 1213 Newell Road	**Tuesday, May 14, 2019** **6:30 pm** Adobe Room at Mitchell Park Community Center 2700 Middlefield Road	**Monday, May 21, 2019** **3:30 pm** College Terrace Library 2300 Wellesley Street

The City appreciates your effort and thanks you in advance for your contribution to the City's Update to the ADA Transition Plan. Any information provided to us will help strengthen the final recommendations for the City Council's consideration.

This questionnaire is also available at www.cityofpaloalto.org/ADATransitionPlan. To request an alternate format please contact Public Works Engineering by email at pwecips@cityofpaloalto.org or by phone at (650) 329-2295.

1. What are the top five (5) City facilities that you access most frequently? A list of city facilities is provided at the end of this questionnaire for your reference.
   a. _____
   b. _____
   c. _____
   d. _____
   e. _____

2. Do you use city sidewalks or walkways to get around as a pedestrian? ☐ Yes ☐ No

3. Which neighborhood(s) do you reside in and/or visit?
   _____

4. Please provide any comments regarding access to City facilities or the public right-of-way (streets, sidewalks, curb ramps, pedestrian push buttons, etc.) that will aid in updating the Transition Plan.

5. Are you aware of the city's PaloAlto311 app to submit service requests? ☐ Yes ☐ No

6. Identify your relationship with the city.
   I am a ☐ Resident ☐ Commuter ☐ Employee ☐ Visitor

Thank you for taking the time to fill out this questionnaire!

We would also appreciate completion of the *optional* information below. If completed, it will provide our team with the opportunity to compile statistics, provide you a copy of your questionnaire, or contact you for further comment.

☐ My responses are confidential. ☐ My responses may be published.

Name: _____ Survey Completion Date: ____/_____/_____

Address:_____

Phone Contact: (_____)_____-_____ E-mail Address: _____

Questionnaires must be received by June 27, 2019.

Please mail to:

City of Palo Alto
Public Works Engineering
250 Hamilton Avenue
Palo Alto, CA 94301

Scan and e-mail to: PWEcips@cityofpaloalto.org

Or drop off a hard copy of the survey at the following locations:

Mitchell Park Community Center
3700 Middlefield Road

Rinconada Library
1213 Newell Road

Civic Center
250 Hamilton Avenue

Cubberley Community Center, Building T2
4000 Middlefield Road

College Terrace Library
2300 Wellesley Street

List of City Facilities

Public facilities where city programs, services, and activates are provided. This list is subject to change and facilities may be added or removed from the evaluation through the course of this project as the self-evaluation process progresses.

Buildings:

- Animal Services Center
- Arastradero Preserve Gateway Facility
- Art Center
- Baylands Athletic Center
- Environmental Volunteers EcoCenter (Sea Scouts Building)
- Byxbee Park Restrooms
- Children's Library
- Children's Theatre
- Civic Center
- College Terrace Library
- Cubberley Community Center
- Downtown Library
- El Camino Park Restrooms and Scorekeeper Facility
- Fire Station #1
- Fire Station #2
- Fire Station #3
- Fire Station #4
- Fire Station #5
- Fire Station #8
- Foothills Park
    - Entrance Station
    - Interpretive Center
    - Restrooms
- Gamble Garden Center
- Golf Course
- Greer Park Restrooms
- Girl Scouts Building
- Hoover Park Restrooms
- Juana Briones Park Restrooms
- Junior Museum and Zoo
- Landfill Administration Building
- Lawn Bowling Green Park
- Lucie Stern Community Center

- Mitchell Park Library
- Mitchell Park Community Center
- Mitchell Park Clubhouse/Restrooms
- Mitchell Park Tennis Court Restrooms
- Municipal Service Center (MSC)
- Palo Alto Airport Terminal Building
- Peers Park Clubhouse/Restrooms
- Rinconada Library
- Rinconada Park Gazebo/Restrooms
- Rinconada Park Pool/Showers
- Roth Building
- Seale Park Restrooms
- Senior Center (Avenidas)
- Stanford Playing Fields Snacks/Restrooms Building
- Ventura Community Center
- Waste Quality Control Plant
- Williams House
- Winter Lodge

Public Parks:

- Arastradero Preserve
- Baylands Athletic Center
- Baylands Preserve
- Bol Park
- Boulware Park
- Bowden Park
- Briones Park
- Byxbee Park
- Camera Park
- Esther Clark Park
- Cogswell Plaza
- El Camino Park
- Eleanor Pardee Park
- El Palo Alto Park
- Foothills Park
- Gree Park
- Heritage Park
- Hoover Park
- Hopkins Creekside Park
- Johnson Park
- Kellog Park
- Mayfield Park

- Mitchell Park
- Monroe Park
- Peers Park
- Ramos Park
- Rinconada Park
- Robles Park
- Scott Park
- Seale Park
- Stanford-Palo Alto Playing Fields
- Terman Park
- Wallis Park
- Weisshaar Park
- Werry Park
- Lawn Bowling Green Park

Public Parking Facilities:

- Cowper / Hamilton Lot H
- Lytton / Waverley Lot K
- Emerson / Lytton Lot A
- Hamilton / Waverley Lot D
- Gilman / Waverley Lot G
- Gilman / Bryant Lot E
- Emerson / High Lot O
- Ramon / Lytton Lot C
- High / Hamiton Lot P
- Emerson / Ramona Lot N
- Florence / Lytton Lot F
- Lytton / Kipling Lot T
- Civic Center Office Building Public Parking
- Cowper / Webster Parking Garage – Lot J
- Parking Garage – Lot Q
- High Street Parking Garage – Lot R
- Bryant Street Parking Garage – Lot S/L
- California Avenue Lot 1
- California Avenue Lot 2
- California Avenue Ted Thompson Garage Lot 3
- California Avenue Lot 4
- California Avenue Cambridge Garage Lot 5
- California Avenue Lot 6
- California Avenue Lot 7
- California Avenue Lot 8
- California Avenue Lot 9

APPENDIX B

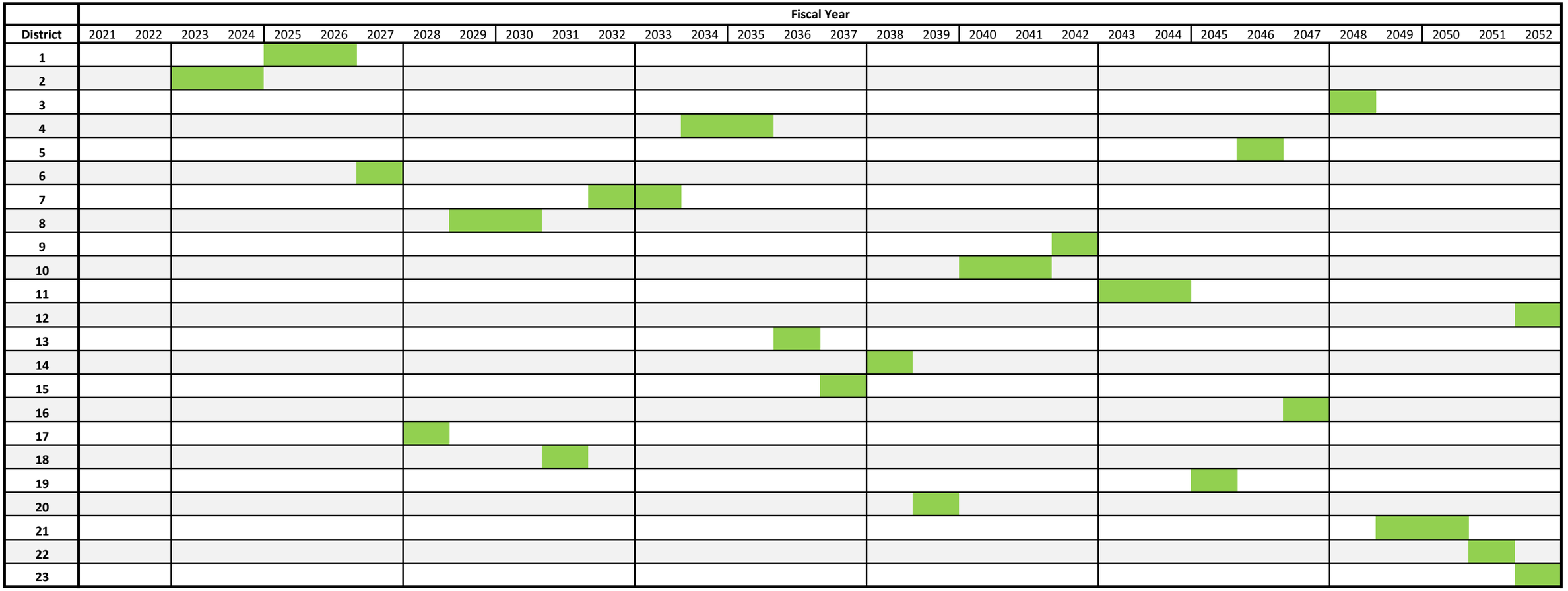
City of Palo Alto
ADA Transition Plan - Implementation Schedule

Facility	Facility Name	Facility Type	Phase	Year											
				Implementation Phase - 1				Implementation Phase - 2				Implementation Phase - 3			
				2021-2025	2026-2030	2031-2035	2036-2040	2041-2045	2046-2050	2051-2055	2056-2060	2061-2065	2066-2070	2071-2075	2076-2080
1	King Plaza	Park	2												
1	Civic Center	Building	3												
2	Civic Center Office Building Public Parking	Parking	2												
3	Arastradero Preserve Gateway Facility and Preserve	Park	2												
4	Baylands, Athletic Center and Preserve	Park	1												
5	Cowper / Hamilton Lot H	Parking	2												
6	Lytton / Waverley Lot K	Parking	1												
7	Emerson / Lytton Lot A	Parking	2												
8	Hamilton / Waverley Lot D	Parking	1												
9	Ventura Community Center	Building	2												
10	Bol Park	Park	1												
11	Children's Library	Building	2												
12	Children's Theater	Building	1												
13	College Terrace Library	Building	2												
14	Cubberley Community Center	Building	3												
15	Gilman / Waverley Lot G	Parking	2												
16	Gilman / Bryant Lot E	Parking	1												
17	Emerson / High Lot O	Parking	2												
18	Ramona/Lyttton Lot C	Parking	1												
19	Boulware Park	Park	1												
20	Bowden Park	Park	1												
21	Downtown Library	Building	2												
22	Bowling Green Park	Building	2												
23	Byxbee Park and Restrooms	Park	1												
24	Firestation #1 (University Park)	Building	2												
25	Firestation #2 (Mayfield)	Building	2												
26	Firestation #5 (Arastradero)	Building	2												
27	Firestation #8 (Foothills Park)	Building	3												
28	High / Hamilton Lot P	Parking	2												
29	Emerson / Ramona Lot N	Parking	2												
30	Florence / Lytton Lot F	Parking	2												
31	Lytton / Kipling Lot T	Parking	2												
32	Gamble Garden Center	Building	2												
33	Golf Course	Building	1												
34	Parking Garage - Lot B	Parking	2												
35	Greer Park and Restrooms	Park	2												
36	Green Waste Facility	Building	1												
37	Hoover Park and Restrooms	Park	1												
38	Briones Park and Restrooms (Juana Briones Park)	Park	2												
39	Cameron Park	Park	1												
40	Esther Clark Park	Park	2												
41	Cogswell Plaza	Park	2												
42	Junior Museum & Zoo	Building	1												
43	Landfill Facility	Building	2												
44	California Avenue BD Lot 6	Parking	1												
45	California Avenue BD Lot 2	Parking	1												
46	California Avenue BD Lot 7	Parking	1												
47	California Avenue BD Lot 4	Parking	1												
48	California Avenue BD Lot 3 (Ted Thompson Parking Garage)	Parking	1												
49	California Avenue BD Lot 8	Parking	1												
50	California Avenue BD Lot 1	Parking	1												
51	California Avenue BD Lot 9	Parking	1												
52	Lucie Stern Community Center	Building	1												
53	Mitchell Park Library	Building	3												
54	Mitchell Park Community Center	Building	3												
55	Mitchell Park and Restrooms	Park	1												
56	Cambridge Parking Garage (Lot 5)	Parking	1												
57	El Camino Park, Restrooms, and Scorekeeper Facility	Park	2												
58	Eleanor Pardee Park and Community Garden	Park	2												
59	El Palo Alto Park	Park	2												
60	Foothills Park	Park	1												
61	Municipal Service Center (MSC)	Building	2												
62	Palo Alto Airport Terminal Building (Portables)	Building	2												
63	Parking Garage - Lot J (Cowper/Webster)	Parking	1												
64	Heritage Park	Park	1												
65	Hopkins Creekside Park	Park	1												
66	Rinconada Library and Community Garden	Building	3												
67	Rinconada Park	Park	1												
68	Seale Park and Restrooms	Park	1												
69	Parking Garage - Lot Q (under residential)	Parking	1												
70	Parking Garage - Lot R (High Street)	Parking	2												
71	Johnson Park and Community Garder	Park	1												
72	Kellog Park	Park	2												
73	Mayfield Park	Park	1												
74	Stanford - Palo Alto Playing Fields and Restrooms	Park	1												
75	Monroe Park	Park	2												
76	Peers Park, Clubhouse and Restrooms	Park	1												
77	Animal Services	Building	2												
78	Art Center	Building	2												
79	Ramos Park	Park	1												
80	Parking Garage - Lot S/L (Bryant Street)	Parking	1												
81	Robles Park	Park	1												
82	Scott Park	Park	2												
83	Water Quality Control Plant	Building	3												
84	Williams House	Building	2												
85	Winter Lodge	Building	2												
86	Terman Park	Park	2												
87	Sarah Wallis Park	Park	1												
88	Weisshaar Park	Park	1												
89	Werry Park	Park	1												
90	Midtown Parking Lot	Parking	1												
91	Fire Station #3 (Rinconada)	Building	4												
92	Fire Station #4 (Mitchell Park)	Building	4												

APPENDIX C

ADA TRANSITION PLAN SCHEDULE

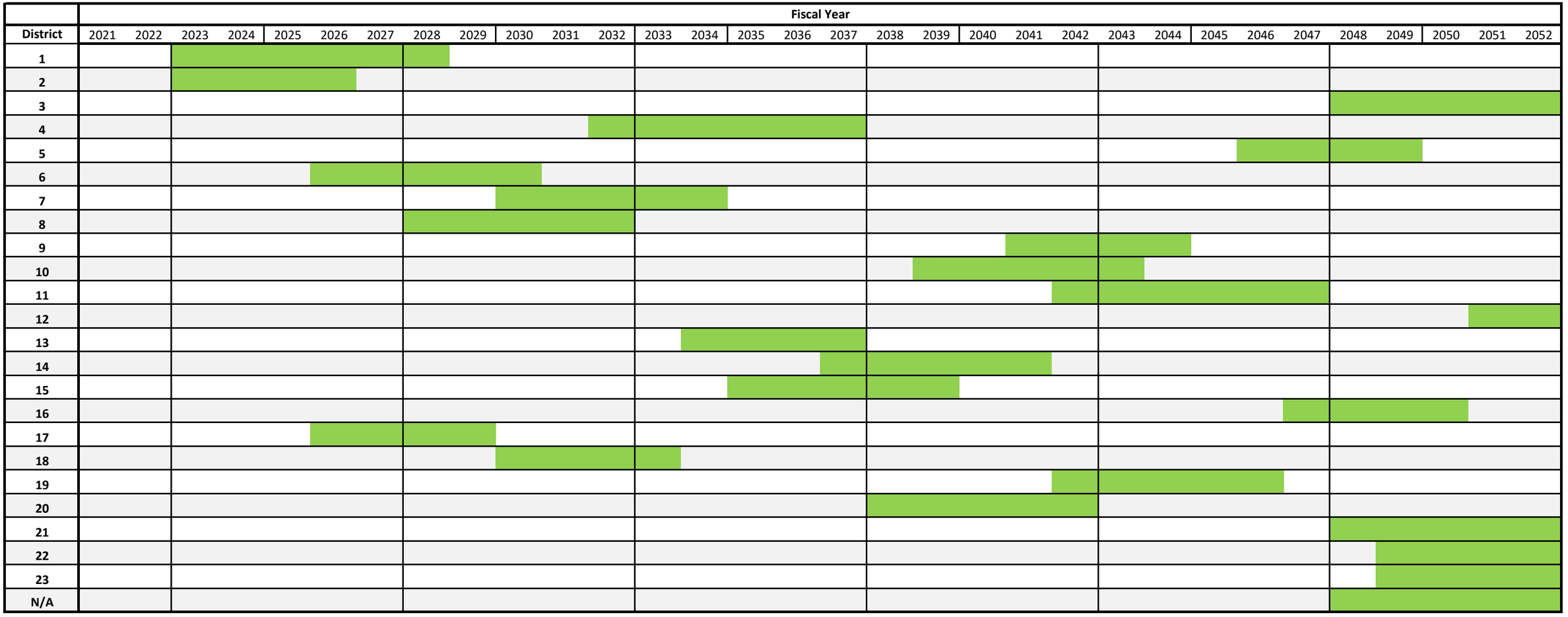
Curb Ramps in Public Right-of-Way



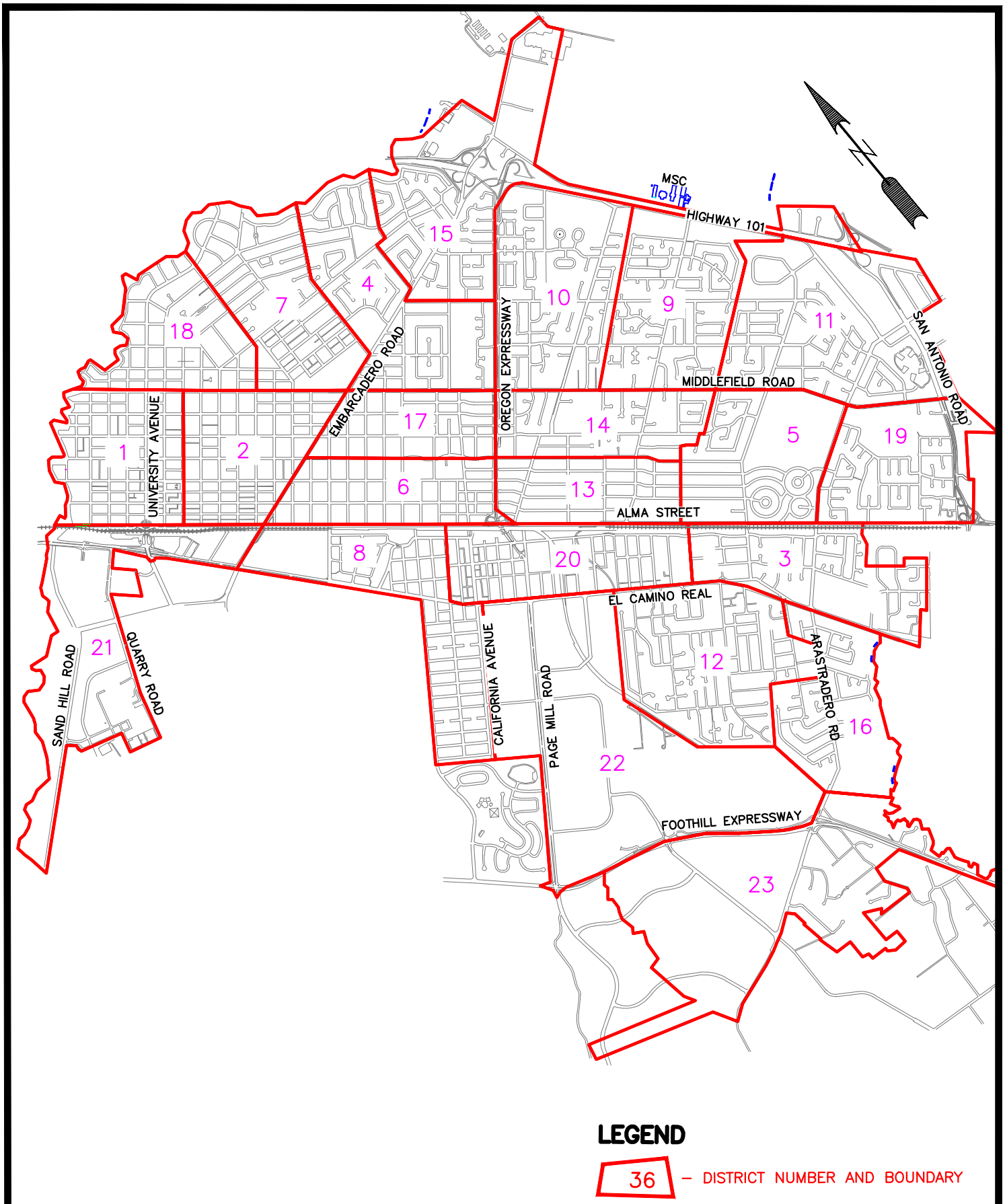
Print Date: 4/13/2021

ADA TRANSITION PLAN SCHEDULE

Sidewalks in Public Right-of-Way



Print Date: 4/13/2021



LEGEND

36 – DISTRICT NUMBER AND BOUNDARY

DRAWN BY: BL **DATE: MAY 13, 2019**	**SIDEWALK DISTRICT MAP**	APPROVED BY: PE NO. DATE:
SCALE: 1"=3600'	City of Palo Alto	DRAWING NO.

ATTACHMENT B
CITY OF PALO ALTO
PUBLIC FACILITY INVENTORY FOR FACILITY SURVEYS

DESCRIPTION	LOCATION	SIZE (SQ. FT.)	YEAR BUILT	YEAR REMODELED (IF APPLICABLE)
Animal Services:	3281 E. Bayshore Rd.			
Kitchen/Kennels/Storage		3,268	1972	
Euthanasia Building		203	1986	
Office/Clinic		2,186	1972	
Arastradero Preserve Gateway Facility	1530 Arastradero Rd.	969	2003	
Art Center	1313 Newell Rd.	26,441	1951	2011
Baylands:				
Athletic Center Grandstands	1775 Embarcadero Rd.	2,250	1969	
Athletic Center Restrooms	1900 Geng Rd.	2,250	1969	
Harbor Master House/Ranger Station	2500 Embarcadero Rd.	475	1969	1986
Environmental Volunteers EcoCenter (Sea Scouts Building)	2560 Embarcadero Rd.	2,209	1936	2012
Interpretive Center	2775 Embarcadero Rd.	3,600	1969	
Byxbee Park Restrooms:	2380 Embarcadero Rd.	568	1972	
Children's Library	1275 Harriet St.	6,043	1940	2007
Children's Theatre:	1305 Middlefield Rd.			
Theatre		17,619	1936	
Civic Center:	250 Hamilton Ave.			
Office Building Tower		104,893	1968	
City Council Building Tower		3,240	1968	
Police Department	271 Forest Ave.	32,224	1968	
College Terrace Library	2300 Wellesley St.	5,050	1935	2010
Cubberley Community Center:	4000 Middlefield Rd.			
Pavilion		17,577	1968	
Boys and Girls Gymnasiums		28,148	1945	
Building I (Foothill College)		13,575	1968	
Building J		7,875	1955	
Building K		7,875	1955	
Building L		14,415	1955	
Building P		3,610	1968	
Theater		11,800	1945	
Building M		11,800	1968	
Building A		5,400	1955	
Building B		5,400	1955	
Building C		5,400	1955	
Building D		5,400	1955	
Building E		5,400	1955	
Building F		5,400	1955	
Buildling FH		1,000	1968	
Building H		8,115	1955	
Building O (Auditorium)		13,790	1945	
Building S		5,650	1945	
Building T1 & T2		8,050	1945	
Building U		4,865	1945	
Building V		1,000	1968	
Downtown Library	270 Forest Ave.	8,741	1967	2011
El Camino Park:	100 El Camino Real			
Restrooms		900	2015	
Scorekeeper Facility		329	2015	

DESCRIPTION	LOCATION	SIZE (SQ. FT.)	YEAR BUILT	YEAR REMODELED (IF APPLICABLE)
Fire Stations:				
#1 (University Park)	301 Alma St.	10,436	1965	
#2 (Mayfield)	2675 Hanover St.	8,131	1965	
#5 (Arastradero)	600 Arastradero Rd.	3,666	1962	
#8 (Foothills Park)	3300 Page Mill Rd.	1,569	1986	
Foothills Park:	3300 Page Mill Rd.			
Interpretive Center		5,035	1967	
Entrance Station		71	1985	
Lake Restrooms		422	1965	
Orchard Glen Restrooms		422	1965	
Oak Grove Restrooms		70	1965	
Gamble Garden Center	1431 Waverley St.	8,200	1902	1987
Golf Course:	1875 Embarcadero Rd.			
Pro shop/Hofbrau		8,516	1978	1986
Office/Maintenance Shop		2,288	1958	
Restrooms (17th Hole)		242	1978	
Greer Park Restrooms	1098 Amarillo Ave.	597	1983	
GreenWaste	2000 Geng Rd.			
Office Building		2,256	1950	2007
Hoover Park Restroom	2901 Cowper St.	500	2003	
Juana Briones Park Restroom	609 Maybell Ave.	129	2014	
Junior Museum & Zoo:	1451 Middlefield Rd.			
Landfill:	2380 Embarcadero Rd.			
Administration Trailer		540	2005	
Lawn Bowling Green Park:	474 Embarcadero Rd.			
Lawn Bowling Clubhouse		2,400	1954	2010
Lawn Bowling Restrooms		1,210	1954	2010
Lucie Stern Community Center:	1305 Middlefield Rd.			
Community Center		12,203	1933	
Theater		33,716	1933	1997
Theater Scene Shop		1,823	1972	
Mitchell Park Library	3700 Middlefield Rd.	41,000	2014	
Mitchell Park Community Center	3700 Middlefield Rd.	15,000	2014	
Mitchell Park:	600 E. Meadow Dr.			
Clubhouse Restrooms		1,078	1957	
Tennis Court Restrooms		306	1956	
Municipal Service Center (MSC):	3201 E Bayshore Rd.			
Building A		15,863	1966	
Building B		22,357	1966	
Building C		32,877	1966	
Guardhouse		49	1972	
UCC/SCADA	3241 E Bayshore Rd.	5,488	1980	
Palo Alto Airport Terminal Building (Portables)	1925 Embarcadero Rd.	1,200	1965	
Peers Park Clubhouse/Restrooms	1899 Park Ave.	1,082	1940	
Rinconada Library	1213 Newell Rd.	31,082	1975	2014
Rinconada Park:	777 Embarcadero Rd.			
Gazebo		394	1957	
Restrooms		511	1930	
Showers/Office/Equipment		3,585	1956	
Snack Bar/Swim/Club		523	1956	
Seale Park Restroom	3100 Stockton Place	156	2011	
Stanford Playing Fields Snacks/Restroom Buildling	27000 El Camino Real	969	2006	

DESCRIPTION	LOCATION	SIZE (SQ. FT.)	YEAR BUILT	YEAR REMODELED (IF APPLICABLE)
Ventura Community Center:	3990 Ventura Ct.			
Childcare Unit #1		2,344	1957	
Childcare Unit #2		9,881	1957	
Childcare Unit #3		6,558	1957	
Childcare Multi-unit		2,698	1957	
Waste Quality Control Plant:	2501 Embarcadero Way			
Operations Building		6,670	1970	
Administration Building		3,120	1975	
Engineering/Maintenance Building		2,610	1978	
Williams House	351 Homer Ave.	7,978	1907	
Winter Lodge	3005 Middlefield Rd.	18,118	1956	

ATTACHMENT B
CITY OF PALO ALTO
PUBLIC PARKING FACILITY INVENTORY FOR FACILITY SURVEYS

DESCRIPTION	LOCATION	SIZE (SQ. FT.)	YEAR BUILT
Cowper / Hamilton Lot H	530 Cowper St.	30,263	
Lytton / Waverely Lot K	351 Lytton Ave.	21,075	
Emerson / Lytton Lot A	401 Ramona St.	20,265	
Hamilton / Waverley Lot D	375 Hamilton Ave.	28,993	
Gilman / Waverley Lot G	643 Gilman St.	16,875	
Gilman / Bryant Lot E	642 Gilman St.	11,250	
Emerson / High Lot O	460 Emerson St.	22,500	
Ramona / Lytton Lot C	451 Ramona St.	17,000	
High / Hamilton Lot P	551 High St.	25,297	
Emerson / Ramona Lot N	539 Emerson St.	15,000	
Florence / Lytton Lot F	415 Florence St.	16,875	
Lytton / Kipling Lot T	450 Lytton Ave.	18,900	
California Avenue BD Lot 6	250 Sherman Ave.	53,420	
California Avenue BD Lot 2	370 Cambridge Ave.	10,000	
California Avenue BD Lot 7	350 Sherman Ave.	40,561	
California Avenue BD Lot 4	391 Cambridge Ave.	26,950	
California Avenue BD Lot 3	275 Cambridge Ave.	27,500	
California Avenue BD Lot 8	450 Sherman Ave.	34,373	
California Avenue BD Lot 1	276 Cambridge Ave.	9,980	
California Avenue BD Lot 9	2350 Birch St.	10,560	
Civic Center Office Building Public Parking	250 Hamilton Ave.	251,508	1970
Cambridge Parking Garage (Lot 5)	400 Cambridge St.	57,830	1968
Parking Garage - Lot J (Cowper/Webster) including garage vehicle approaches	520 Webster St.	269,138	2007
Parking Garage - Lot Q (under residential)	430 High St.	48,000	1984
Parking Garage - Lot R (High Street)	528 High St.	93,930	2003
Parking Garage - Lot S/L (Bryant Street)	445 Bryant St.	229,380	2003
Ted Thompson Parking Garage	275 Cambridge St.	56,000	1994
Midtown Parking Lot	Midtown Ct.	23,000	

ATTACHMENT B
CITY OF PALO ALTO
PUBLIC PARKS INVENTORY FOR FACILITY SURVEYS

DESCRIPTION	LOCATION	SIZE (ACRES)	YEAR ESTABLISHED
Arastradero Preserve	1530 Arastradero Road	533	1970
Baylands Athletic Center	1900 Geng Road	6	1969
Baylands Preserve	2775 Embarcadero Road	1,940	N/A
Bol Park	3590 Laguna Avenue	13.8	N/A
Boulware Park	410 Fernando Avenue	1.5	1894
Bowden Park	Alma Street at North California Avenue	2	1952
Bowling Green Park	474 Embarcadero Road	2	1934
Briones Park	Arastradero Road at Clemo Avenue	4.1	1889
Byxbee Park	2375 Embarcadero Road	126	1960
Cameron Park	2101 Wellesley Street	1.1	1888
Esther Clark Park	Old Adobe Road off of Arastradero Road	21	N/A
Cogswell Plaza	264 Lytton Avenue	0.5	1955
El Camino Park	100 El Camino Real	12.19	1914
Eleanor Pardee Park	851 Center Drive	9.6	1957
El Palo Alto Park	117 Palo Alto Avenue	0.5	N/A
Foothills Park	3300 Page Mill Road	1,400	N/A
Greer Park	1098 Amarillo Street	22	1967
Heritage Park	300 Homer Avenue	2.01	2006
Hoover Park	2901 Cowper Street	4.2	1950
Hopkins Creekside Park	Palo Alto Avenue	12.4	1907
Johnson Park	Everett Street and Waverley Street	2.5	1968
Kellog Park	Waverly Street at Embarcadero Road	0.34	N/A
Mayfield Park	2300 Wellesley Street	1.1	1888
Mitchell park	600 East Meadow Avenue	21.4	1957
Monroe Park	Monroe and Miller Avenue	0.55	N/A
Peers Park	1899 Park Boulevard	4.7	N/A
Ramos Park	800 East Meadow Drive	4.4	1958
Rinconada Park	777 Embaracadero Road	19	1922
Robles Park	4116 Park Boulevard	4.7	1968
Scott Park	Scott Street at Channing Avenue	0.04	N/A
Seale Park	3100 Stockton Place	4.3	1968
Stanford - Palo Alto Playing Fields	2700 El Camino Real	5.9	2005
Terman park	655 Arastradero Road	7.7	1970
Wallis Park	202 Ash Street	0.3	1888
Weisshaar Park	2300 Dartmouth Street	1.1	1888
Werry Park	2100 Dartmouth Street	1.1	1888

Attachment C – ADA Transition Plan Reports

Facility surveys were completed between January 2016 to January 2017. Park Reports include the buildings such as restrooms, clubhouses, or other buildings associated with the park.

BUILDINGS	PARKING	PARKS
Animal Services Building	Cal Ave Parking Lot 1	Baylands Nature Preserve
Arastradero Gateway	Cal Ave Parking Lot 2	Bol Park
Art Center	Cal Ave Parking Garage Lot 3 – Ted Thompson	Boulware Park
Children's Library	Cal Ave Parking Lot 4	Bowden Park
Children's Theater	Cal Ave Parking Garage Lot 5 – Cambridge	Bowling Green Park
Civic Center	Cal Ave Parking Lot 6	Briones Park
College Terrace Library	Cal Ave Parking Lot 7	Byxbee Park
Cubberley Community Center	Cal Ave Parking Lot 8	Cameron Park
Downtown Library	Cal Ave Parking Lot 9	Clark Park
Fire Station #1	Civic Center Parking Garage	Cogswell Plaza
Fire Station #2	Midtown Parking Lot	El Camino Park
Fire Station #5	Parking Lot A	El Palo Alto Park
Fire Station #8	Parking Garage Lot B	Eleanor Pardee Park
Gamble Garden Center	Parking Lot C	Foothills Park
GreenWaste Facility	Parking Lot D	Golf Course
Junior Museum and Zoo	Parking Lot E	Greer Park
Landfill Facility	Parking Lot F	Heritage Park
Lucie Stern Community Center	Parking Lot G	Hoover Park
Mitchell Park Community Center	Parking Lot H	Hopkins Creekside Park
Mitchell Park Library	Parking Garage Lot J	Johnson Park
Municipal Services Center	Parking Lot K	Kellogg Park
Palo Alto Airport Terminal Building	Parking Lot N	Mayfield Park
Rinconada Library	Parking Lot O	Mitchell Park
Ventura Community Center	Parking Lot P	Monroe Park
Water Quality Control Plant	Parking Lot Q	Peers Park
Williams House Heritage Museum	Parking Garage Lot R	Ramos Park
Winter Lodge	Parking Garage Lot SL	Rinconada Park
	Parking Lot T	Robles Park
		Sarah Wallis Park
		Scott Park
		Seale Park
		Stanford-Palo Alto Playing Fields
		Terman Park
		Weisshaar Park
		Werry Park