



CITY OF SANTA BARBARA ACCESSIBILITY SURVEY, ADA TRANSITION PLAN UPDATE, SELF-EVALUATION UPDATE AND TRAINING PROGRAM

A. EXECUTIVE SUMMARY

Pursuant to the City of Santa Barbara's non-discriminatory policy, it has prepared this ADA Transition Plan and Self-evaluation Update in an effort to comply with the Federal and State accessibility codes/regulations including the Americans with Disabilities Act (ADA) Civil Rights Act; California Code of Regulations Title 24, Parts II, III, and V.

This project is part of the City's ongoing efforts to comply insure that the City's programs, services and activities are accessible to persons with disabilities and all City Facilities users.

The City of Santa Barbara contracted an independent accessibility consultant Gilda Puente-Peters, Architects (GPPA) *Universal Design Specialists* to assist the City in preparing the ADA Transition Plan Update to evaluate City selected facilities in order to determine physical barriers that impede program access to its facilities, programs, services, and activities.

The ADA Transition Plan and Self-evaluation Update process took approximately one and one-half years, and it was an interactive process between the Accessibility consultant, staff members and members of the public including persons with disabilities.

There are five main components in the scope of work of this project:

1. The **Accessibility Survey** of physical barriers. Detailed survey for 9 facilities and general evaluation surveys for selected General Fund and Enterprise facilities.
2. Preparation of **ADA Transition Plan update**, which analyses the results of the accessibility survey and program accessibility evaluation to prioritize and provide a general schedule for implementation.



3. Preparation of a **Self-evaluation update**, which consists of evaluating several policies, practices and procedures and provides recommendations to improve current policies, practices and procedures to insure non-discriminatory practices throughout the City.
4. Preparation and conduct an **Accessibility Training Program**, which includes general awareness presentations as well as detailed technical outdoor, public right-of-way and building accessibility trainings.
5. Preparation of a **Preliminary Capital Improvement Report For General Fund Facilities**. The intent of this report was to obtain preliminary information prior to completion of the Transition Plan Update to be used to select priority accessibility projects that will be included in the Capital Improvement Budgeting for the next two fiscal years 2007-2008. The disability community in the second public outreach meeting reviewed the selection of these priority projects.

The City of Santa Barbara Streets & Sidewalks ADA Transition Plan is being prepared in-house by Public Works Department. Some selected policies and recommendations are included on **Chapter 5** of this ADA Transition Plan Update report.

The architectural survey identifies structural barriers to access, but it is important to note that not all structural barriers need to be eliminated for the City to comply with the ADA and similar laws. Title II of the ADA requires city governments to ensure that all of their programs, services, and activities, when viewed in their entirety, are accessible to people with disabilities.

Program access under Title II is intended to remove physical barriers to city services, programs, and activities, but it generally does not require that a city government make each facility, or each part of a facility, accessible. Program accessibility may be achieved in a variety of ways. City governments may choose to make structural changes to existing facilities to achieve access. But city governments can also choose to pursue alternatives to structural changes to achieve program accessibility.

The City may change the priority of projects listed in this document based on its ability to make programs services and activities accessible in other ways.

City governments must give priority to such choices that offer services, programs, and activities in the most integrated setting appropriate. In addition, all newly constructed city facilities must be fully accessible to people with disabilities.

B. INTRODUCTION

Background

The Americans with Disabilities Act, Public Law 336 of the 101st Congress, was enacted July 26, 1990. The effective date of the ADA was 18 months after the date of enactment of this Act, January 26, 1992. According to the ADA the implementation of the ADA Transition Plans for Title II public entities, the Transition Plan was supposed to be completed in July of 1995, therefore, all public entities have the obligation to provide program accessibility for their facilities, when viewed in their entirety, and is liable for lawsuits from citizen complaints, while the ADA is a Civil Rights Law, enforced through litigation.

The City of Santa Barbara had the option of choosing between Uniform Federal Accessibility Standards (UFAS) or the Americans with Disabilities Act (ADA) as a Federal Standard. The ADA was selected since this is a newer standard and it has the more detailed technical requirements contain in the Americans with Disabilities Accessibility Guidelines (ADAAG). The UFAS has more detailed standards for Housing projects. As required the most stringent requirements from either the State or Federal requirements were used.

*Title II which applies to publicly funded facilities, requires that services, programs or activities conducted by a public entity, when viewed in its entirety, **be readily accessible to and usable by individuals with disabilities**, except where to do so would result in a fundamental alteration in the nature of the program or in undue financial and*



administrative burdens. Compliance with these provisions would in most cases not result in undue financial and administrative burdens on a public entity. In determining whether financial and administrative burdens are undue, all public entity resources available for use in the funding and operation of the service, program, or activity shall be considered. **The burden of proving that compliance with the ADA, paragraph (a) of §35.150 would fundamentally alter the nature of a service, program or activity or would result in undue financial and administrative burden rests with the public entity.** This means that if the City cannot make their services, programs or activities accessible to persons with disabilities, the burden to prove that they cannot be meet with this requirement due to an undue financial and administrative burden rests with the City of Santa Barbara.

The City of Santa Barbara ADA Transition Plan is a living document that provide the City with a planning tool that includes priorities for barrier removal, a general schedule and strategies for implementation. This planning document includes recommendations and provides a road map that the City can follow to proceed with a systematic long-term implementation plan. A great deal of interactive thinking and decision-making went into the development of this plan. The City has demonstrated its good faith effort to provide access to the programs, services, and activities and is committed to continue to do so during the implementation of this plan.

It is important to remember that although the ADA Transition Plan establishes priorities for barrier removal, the plan is flexible in nature allowing the City to make adjustments as needed on a yearly basis to address current available budgets, change in priorities due to current capital projects in the City or specific needs and requests by persons with disabilities. When budgeting each year the funds that will be dedicated to the implementation of the ADA Transition Plan, all the public entity resources available for use in the funding and operation of the service, program, or activities shall be considered. It is important that the City makes concerted efforts to look for funding sources for barrier removal or reallocation of currents funds and priorities take place is needed. It is important that the City demonstrates its good faith effort by the continuous planning and allocation of funds and resources towards the implementation of this Plan.



For the detailed scope of work of the facilities evaluations refer to Chapter 1, Sections E, F and G of this report.

The Self-Evaluation update includes recommendations regarding policies, practices and procedures and is found under separate cover in Technical Appendix D.

Gilda Puente-Peters, Accessibility Consultant, in the initial phase of this project worked interactively with staff members from different departments, to obtain information and has made field visits to representative City of Santa Barbara facilities to develop a strategic plan and recommended project approach. This preliminary general assessment allowed the Consultant and City staff to devise a comprehensive and cost effective approach to a City-wide ADA Transition Plan and Self-evaluation Updates and Access Compliance program.

The nature of this project lent itself to a phased approach that allowed the City to complete certain prioritized milestones and start implementation in those areas. For instance the selected priority 9 General Fund facilities that have been surveyed in detail in the initial phase of this project started budgeting and implementation while the general evaluation and preparation of the ADA Transition Plan takes place for other facilities. Due to the higher cost of preparing detailed evaluations for all City facilities that included cost estimates and detailed solutions, City staff selected to have the Consultant do general evaluations for the remaining City facilities, in order to identify the major barriers to access. Over time and based on the results of the general evaluations, recommendations for additional detailed surveys for additional high priority facilities that could be done in the future. The budgetary cost estimates for these facilities can be added to this City-wide Transition Plan Update implementation schedule, which will allow the City to budget additional prioritized projects as needed.

The ADA Survey report findings were used as a basis for the preparation of the ADA Transition Plan, in conjunction with a program accessibility analysis and prioritization for barrier removal. The result of this Transition Plan is a barrier removal plan that will be updated every two years as part of the City's long-range capital program planning



process. It is important to emphasize that this Transition Plan is a living document that will evolve with time depending on funding availability, capital improvement projects, as well as changing needs in the community.

The City has been able to start with the removal of physical barriers prior to the completion of this ADA Transition Plan Update, using the preliminary Capital Outlay reports for accessibility barrier removal, as well as the Self-Evaluation Plan recommendations and updates to the City's policies, practices and procedures as they were available.

The project approach and milestones are summarized below:

1. Prepare a comprehensive ADA Transition Plan and Self-evaluation updates for all City of Santa Barbara General Fund and Enterprise Departments. Based on the magnitude of the project, a phased approach was recommended:
 - a. Part 1 focuses in the evaluation of City of Santa Barbara **General Fund facilities**. GPPA will prepare an Accessibility Survey for 9 priority facilities, a general evaluation and prioritization of General Fund facilities (using some of the information gathered in the initial site visits and additional field inspections), an ADA Transition Plan update, the partial Self-evaluation update and the accessibility Training Program.
 - b. Part 2 of this project encompasses an evaluation of City of Santa Barbara **Enterprise facilities**. GPPA will conduct a general evaluation and prioritization of Enterprise facilities (using some of the information gathered in the initial site visits and additional field inspections) and prepare an ADA Transition Plan update.
 - c. Part 3 encompasses the **Public Right-of-Way** general evaluation and preparation of recommendations regarding some of the current standards used and implementation practices and procedures.



2. Conduct a **detail physical Accessibility Survey of 9 priority General Fund buildings and facilities** which have a high volume and frequency of public use. The resulting accessibility survey reports will include descriptions of conditions found to be in non-compliance (accessibility barriers), photos of main accessibility barriers, proposed solutions and budgetary cost estimates, providing City staff with detailed planning information to be used in their barrier removal efforts. These detailed reports will also include space for an implementation date to be completed by City staff as barrier removal efforts take place, to monitor the progress made through the years towards access compliance.
3. Analyze the Accessibility Survey report findings in conjunction with conducting an overall **Program Accessibility analysis** of City's programs, services and activities offered to the general public. This process will involve City staff participation, questionnaires and workshops. This analysis will provide the City of Santa Barbara and the Accessibility Consultant the information needed to prioritize the City's architectural barrier removal efforts required to provide program accessibility.
4. In order to prepare a phased **ADA Transition Plan report**, for there are several levels of prioritization that take place. The prioritization methodology described below applies to the **9 General Fund facilities with detailed surveys**:
 - a. First the detailed accessibility survey reports include, for each non-compliant item, a column for priorities that evaluates the intensity of the barrier, whether there is a hazardous condition, if the architectural barrier impedes access or if removal will enhance accessibility to a useable condition.
 - b. A Second level of prioritization is done using the survey report, incorporating the criteria established during the program accessibility analysis of each facility, omitting the barriers that not requiring to be removed as they are dealt with when providing program accessibility.



- c. A Third level of prioritization is done within each type of facility by department using parameters such as the frequency and intensity of public use, the nature of the program provided, the geographic location within the City, etc. The Consultant will prepare a priority list by department with City' staff input.
 - d. The last level of prioritization is the establishment of City-wide priorities. Conduct a staff workshop to prioritize the City's implementation efforts. This prioritization scheme will serve as the basis to prepare the final ADA Transition Plan Update.
5. Once these different levels of prioritization are accomplished we will be able to prepare the overall City-wide ADA Transition Plan implementation schedule and will provide the City with direction as to how to prioritize their yearly budgets and barrier removal efforts. It is important to understand that an ADA Transition Plan is a living document that should be adjusted according to the yearly funding availability, other on going City priority projects that include facility improvements, requests for accommodation from members of the disability community, etc. The City's ADA Transition Plan should also be updated to reflect the periodic code changes at the Federal and State level to keep the plan current.
 6. The **Self-evaluation update** report, is limited to the evaluation and preparation of recommendations regarding some basic important ADA requirements, based on the analysis of current policies, practices and procedures of the selected high priority items as defined in the scope of work of this project.
 7. Another component of this project is to prepare and provide a detailed **Disabled Access Compliance code training** given to selected City staff. This training will enhance staff knowledge base, understanding of the law, codes, regulations and the ergonomics of disabilities, improving their daily job performance related to serving the public, therefore lowering the City's liability.



C. CITY OF SANTA BARBARA HISTORY OF ACCESS COMPLIANCE

The City of Santa Barbara through the years has taken several positive steps in an effort to provide program access, to ensure that individuals with disabilities are not excluded from programs, services and activities offered by the City.

The City in 1984 prepared its first Transition Plan to meet compliance regulations of Section 504 of the Rehabilitation Act of 1973. In 1993 the Waterfront Department hired a consultant to prepare the "Waterfront Department ADA Plan – Harbor". Since then no other updates have been done.

The City of Santa Barbara has made significant progress through multiple efforts towards access compliance, making improvements to its Public Right-of-Way, buildings and facilities.

The overall status of City compliance has not been evaluated in detail to develop comprehensive accessibility compliance plan. Given the fact that 16 years have passed since the ADA was enacted and 11 years since the ADA Transition Plan was supposed to be completed and implemented, the City administration has decided to prepare a comprehensive evaluation of the City's facilities, programs and activities and prepare a comprehensive ADA Transition Plan and Self-evaluation Updates.

D. PROGRAM ACCESSIBILITY

Program Accessibility

Ensuring program accessibility is an important aspect of enhancing opportunity for persons with physical disabilities.

The requirements for "program accessibility" are described in the final Rules and Regulations of Title II of the ADA (Code of Federal



Regulations, Title 28, Part 35, Subpart D) as well as Section 504 prohibiting public entities from denying people with disabilities equal opportunity to participate in programs services and activities because their facilities are inaccessible to them. Both regulations have two standards to be used in determining whether a covered entity's programs, activities and services are accessible to individuals with disabilities. One standard deals with "existing" facilities and the other deals with new construction and alterations.

Existing Facilities:

Federal Standards:

For existing facilities, Title II of the ADA and Section 504 require that a public entity (including a local government) shall operate each service, program, or activity, in such a way that when viewed in its entirety, they are accessible to and usable by people with disabilities. This is known as "**program accessibility**" and is one of the most important concepts in compliance planning. (*The ADA does not require the public entity to make all of its existing facilities accessible, nor does it require that the public entity make any modifications that would fundamentally alter the nature of a service, program, or activity or would result in undue financial and administrative burdens*).

Unlike title III of the Act, which requires public accommodations to remove architectural barriers where such removal is "readily achievable," or to provide goods and services through alternative methods, where those methods are "readily achievable," title II requires a public entity to make its programs accessible in all cases, except where to do so would result in a fundamental alteration in the nature of the program or in undue financial and administrative burdens. Congress intended the "undue burden" standard in title II to be significantly higher than the "readily achievable" standard in title III. Thus, although title II may not require removal of barriers in some cases where removal would be required under title III, the program access requirement of title II should enable individuals with disabilities to participate in and benefit from the services, programs, or activities of public entities in all but the most unusual cases. It is the Department's view that compliance with §35.150(a), like compliance with the corresponding provisions of the section 504 regulations for federally



conducted programs, would in most cases not result in undue financial and administrative burdens on a public entity. In determining whether financial and administrative burdens are undue, all public entity resources available for use in the funding and operation of the service, program, or activity should be considered. The burden of proving that compliance with paragraph (a) of §35.150 would fundamentally alter the nature of a service, program, or activity or would result in undue financial and administrative burdens rests with the public entity.

The decision that compliance would result in such alteration or burdens must be made by the head of the public entity or his or her designee and must be accompanied by a written statement of the reasons for reaching that conclusion. The determination must be made by a high level official, no lower than a Department head, having budgetary authority and responsibility for making spending decisions. If the public entity feels that it has a case of “undue hardship” it shall document the case following the strict procedures outlined in the ADA. There are various methods that may be appropriate for providing "program accessibility" in lieu of making actual physical structural changes to facilities. It is very important to understand the concept of program accessibility because it serves as a guideline in evaluating existing facilities and formulating structural and nonstructural solutions to any physical access problems found in the City's facilities.

Under Title II of the ADA, an existing facility includes facilities that were already constructed, or for which construction had begun, prior to the effective date of the Title II regulation (January 26, 1992). Under the Section 504 regulation for federally assisted programs, an existing facility is defined as any facility that was already constructed, or for which ground-breaking had begun, prior to the effective date of the Section 504 regulation (June 3, 1977).

New Construction and Alterations:

A public entity in the State of California is obligated to comply with the most restrictive of the Federal or State standards.

Federal Standards:



Both Title II of the ADA and Section 504 require that a new or altered facility (or the part that is new or altered) be readily accessible to and usable by individuals with disabilities. *(The new construction and alterations requirements focus on providing physical access to buildings and facilities rather than on providing access to programs and services).* There is no fundamental alteration or undue burden limitation on the new construction and alterations requirements. In the City of Santa Barbara, the only facility that was built after January 26, 1992 is the Fire Station 13, which has minor code deviations as indicated in the Transition Plan.

4.1.6(2) Alterations to an Area Containing a Primary Function: In addition to the requirements of 4.1.6(1), an alteration that affects or could affect the usability of or access to an area containing a primary function shall be made so as to ensure that, to the maximum extent feasible, the path of travel to the altered area and the restrooms, telephones, and drinking fountains serving the altered area, are readily accessible to and usable by individuals with disabilities, unless such alterations are disproportionate to the overall alterations in terms of cost and scope (as determined under criteria established by the Attorney General).

State Standards:

For all existing buildings and facilities, when alterations, structural repairs or additions are made to existing buildings or facilities they shall comply with all provisions of Division I of the CCR Title 24, New Buildings, except as modified by this division. This requirement applies only to the specific area of alteration, structural repairs or additions and shall include: access to the primary entrance to the building or facility, the primary path of travel to the specific area of alteration, structural repair or addition, sanitary facilities, drinking fountains and public telephones serving the area.

For existing buildings, when the total construction cost of alterations, structural repairs or additions does not exceed the valuation threshold established by the ENR 20 Cities Construction Index for January, 2007 of \$116,837.68, in accordance with the 2001 California Building Code Section 1134B.2.1 Exception 1, and the enforcing agency finds that compliance with this code creates an unreasonable hardship, compliance shall be limited to the actual work of the project. For



instance, an unreasonable hardship exists where the cost of providing an accessible entrance, path of travel, sanitary facilities, public phones and drinking fountains, is disproportionate to the cost of the project; that is, where it exceeds 20% of the cost of the project without these features. In this case access shall be provided to the extent that it can be without incurring disproportionate cost. Priority should be given to those elements that will provide the greatest access in the following order:

1. An accessible entrance
2. An accessible route to the altered area
3. At least one accessible restroom for each sex
4. Accessible telephones
5. Accessible drinking fountains
6. When possible, additional accessible elements such as parking, storage and alarms.

ADA Survey Reports:

The ADA Survey reports prepared in developing this Transition Plan are a comprehensive evaluation of the existing conditions of City Facilities in regards to its compliance with the applicable ADAAG Federal Guidelines and the State of California CCR Title-24 accessibility standards. When a conflict existed between the two regulations, the most stringent requirement was applied in the ADA Survey reports to all City's facilities. The City should use these ADA Survey reports, when altering or remodeling the existing facilities in order to provide full accessibility as required by code, when the magnitude of the project triggers this code requirement, if not limited to the Exception 1 - California Building Code Section 1134B.2.1, if the enforcing agency finds that compliance with this code creates an unreasonable hardship, compliance shall be limited to the actual work of the project, (see explanation above under State Standards).

ADA Transition Plan Update:

The Transition Plan, on the other hand, is the result of the program analysis of existing facilities. This interactive process allowed us to understand the specific public programs, services, and activities occurring at existing facilities within the City of Santa Barbara as the



first step in determining whether non-structural solutions could provide program accessibility, or structural changes to the City's existing facilities are needed to make their programs, services and activities comply with the program accessibility requirement.

A primary service or function is defined in this Transition Plan Update as a service, program, or activity in which any member of the public has the right to participate and which is offered at no other location within the City. As part of the program analysis, we made the determination of what are the important barriers to be removed in order to provide program accessibility to each facility. The Transition Plan includes selective barrier removal derived from this program accessibility analysis and different prioritization criteria, looking at alternative non-structural solutions as well as technical infeasibilities.

Then, we categorized and prioritized the facilities within each type, according to different criteria like public use, condition of the facility, location within the City, importance of the programs services and activities offered. The goal of the Transition Plan Update prioritization is to provide program accessibility to the facilities where the most important type of programs, and services for persons with disabilities take place, accessibility to the facilities that have high public use, and to the least accessible facilities in the most cost effective manner.

This prioritization needs to take place since most public entities need to do a phased implementation of barrier removal. It is important to understand that any prioritization shall not imply that some items are not important or that correction is not necessary. The law does not differentiate between "important" or "unimportant" requirements. The prioritization is intended to reflect the analysis and desires of the City with the input of the disabled community to establish a ranking in order of priority of what should be accomplished first in an ADA Transition Plan Update phased implementation. It is also important to remember that priorities are not static and that are subject to re-evaluation as the implementation phase proceeds and also requests for accommodation from the disabled community may warrant re-prioritization.

The ADA Transition Plan Update lays out the steps or road map that the public entity needs to follow to achieve the goal of ADA compliance. This ADA Transition Plan Update is intended to be used during the implementation phase of barrier removal projects needed in

order to comply with program accessibility. Transition Plan barrier removal projects do not trigger additional code requirements in the area of remodel. It is important to be aware of code changes at the State and Federal levels to update the Transition Plan as needed to comply with current codes. Another important aspect is to monitor the implementation of the Plan keeping track of the progress of barrier removal by preparing yearly Transition Plan updates.

E. ACCESSIBILITY DETAILED SURVEY & TRANSITION PLAN REPORTS SCOPE OF WORK

E.1 Accessibility Detailed Survey and Transition Plan Reports Scope of Work for 9 Priority General Fund Facilities:

The findings of the Detailed Accessibility Surveys are individual reports compiled in separate survey reports for each of the facilities listed below, found under a separate cover and are which are an integral part of this Transition Plan update as technical appendices TA-A. The scope of the ADA detailed survey work includes the following 9 priority City facilities:

1. City Hall and City Hall Annex – TA-A.1
2. Central Library – TA-A.2
3. Eastside Library – TA-A.3
4. Cabrillo Pavilion Arts Center and Eastside Bath House– TA-A.4
5. Community Development/Public Works– TA-A.5
6. Westside Community Center– TA-A.6
7. Mackenzie Park (including lawn bowls) – TA-A.7
8. Alice Keck Park – TA-A.8
9. Police Station – TA-A.9

These City priority facilities had a comprehensive evaluation of the existing conditions in regards to its compliance with the applicable 1998 ADAAG Federal guidelines and the State of California 2001 California Building Code Title-24 accessibility standards. When conflict



exists between the two regulations, the most stringent requirement has been applied.

For detailed information on any of these 9 facilities, please refer to the complete Detailed Accessibility Survey reports under separate cover in Technical Appendix TA-A.1 through TA-A.9.

These **detailed accessibility survey reports** should be used when **remodeling or alteration projects** occur within these 9 facilities, since the more comprehensive access requirements (similar to new construction) apply to these types of projects requiring full code compliance in the area of remodel or alteration.

E.2 Detailed ADA Transition Plan Update Report for 9 Priority General Fund Facilities:

For the **ADA Transition Plan Update report for these 9 priority facilities** refer to Chapters 2 and 3 of this of this ADA Transition Plan update, which include budgets, prioritization and schedule for implementation, as well as the program accessibility analysis.

This ADA Transition Plan Update report should be used by the City to implement and monitor the Transition Plan. **The Transition Plan is intended to be used for projects with funding specifically allocated for ADA Barrier Removal projects needed to provide program accessibility to City facilities.** This report should be used in conjunction with the Detailed Accessibility Survey Reports as reference, since the Transition Plan has only the data with costs, recommended solutions and priorities from the data base and the survey reports include the photographs, site plans and floor plans with reference circles and numbers that help locate the architectural barriers noted at each facility. Some item numbers might be missing in the Transition Plan reports, which means that these items have been purposely omitted in the Transition Plan.

F. ACCESSIBILITY GENERAL EVALUATION – GENERAL FUND FACILITIES



F.1 General Accessibility Evaluations –General Fund Facilities Scope of Work:

In the initial phase of the project, a selection process of the facilities that will be included in this study took place. City staff took into consideration the level of public access, intensity of use and type of programs offered to select the priority facilities. The result of this process was the selection of 149 City facilities that will be included in this ADA Transition Plan Update. 9 high priority facilities had detailed evaluations as discussed in Chapter 1, Section E of this report and 140 general evaluations. The general evaluations are organized in two groups, based on the general structure of City Departments, 70 General Fund facilities and 70 Enterprise facilities. The Enterprise facilities general evaluations are discussed in Chapter 1, Section G of this report.

For detailed information regarding the 70 General Fund facility evaluations, please refer to Technical Appendix TA-B - General Accessibility Survey and Program Accessibility Reports – General Fund Facilities found under a separate cover.

F.2. List of General Fund Facilities included in the general evaluations scope of work:

Community Development Department:

1. RDA Train Station

Fire Department:

2. Fire Station #1
3. Fire Station #2
4. Fire Station #3
5. Fire Station #4
6. Fire Station #5
7. Fire Station #6
8. Fire Station #7
9. Fire Training Facility – A, B, C

Library Services Department:

10. Goleta Library
11. Carpinteria Library
12. Montecito Library



- 13. Solvang Library
- 14. Santa Ynez Library
- 15. Los Olivos Library

Parks and Recreation Department:

- 16. Cabrillo Ball Park
- 17. Chase Palm Park
- 18. Chase Palm Park Expansion
- 19. Parks Administration
- 20. Recreation Main Office
- 21. Los Banos del Mar Pool
- 22. Municipal Golf Course
- 23. Mulligan's Restaurant
- 24. Municipal Tennis Center
- 25. Skater's Point
- 26. Carrillo Recreation Center
- 27. Carrillo Gymnasium
- 28. 1235 Chapala Teen Center
- 29. Franklin Community Center
- 30. Louise Lowry Davis Center
- 31. Dwight Murphy Field
- 32. Las Positas Tennis Courts
- 33. Pershing Park (tennis, softball, baseball)
- 34. Spencer Adams Park (w/lawn bowls)
- 35. Casa Las Palmas
- 36. Ortega Welcome House
- 37. Oak Park Wading Pool
- 38. Ortega Park Pool
- 39. West Beach Wading Pool
- 40. Franceschi Park
- 41. Mission Historical & Rose Garden
- 42. Bohnett Park
- 43. Eastside Neighborhood
- 44. La Mesa Park
- 45. East Beach
- 46. Leadbetter Beach
- 47. West Beach
- 48. Alameda Park
- 49. De La Guerra Park
- 50. Oak Park
- 51. Ortega Park

52. Shoreline Park
53. Douglas Family Preserve
54. Parma Park
55. Sheffield Reservoir
56. Andree Clark Bird Refuge
57. Morton Bay Fig Tree
58. Escondido Park
59. Hidden Valley Park
60. Hilda Ray Park
61. Parque de los Ninos
62. Plaza Vera Cruz
63. Stevens Park
64. Willowglen Park
65. Skofield Park
66. Mesa Lane Steps
67. Thousand Steps
68. Shoreline Park Steps

Public Works Department:

69. ICS - Motor Pool
70. Public Works Facility Division Maintenance

G. ACCESSIBILITY GENERAL EVALUATION – ENTERPRISE FACILITIES

G.1 General Accessibility Evaluations –Enterprise Facilities Scope of Work:

As indicated in section F, a similar facility selection process for the Enterprise facilities that will be included in this study took place resulting in the selection of 70 Enterprise facilities that are part of this report.

For detailed information regarding the 70 Enterprise Fund facility evaluations, please refer to Technical Appendix TA-C - General Accessibility Survey and Program Accessibility Reports – Enterprise Facilities found under a separate cover.

G.2. List of Enterprise Fund Facilities included in the general evaluations scope of work:



There are four enterprise departments that have general evaluations reports for the following 70 selected facilities:

Airport Department:

1. R&D - 100 Frederic Lopez Road
2. Office - 705-A Norman Firestone Rd.
3. Tour Center - 45 Cyril Hartley Place
4. Rental Cars/StorageSOC - 114 Wm. Moffett Pl.
5. Hangar 5/Maintenance - 204 Wm. Moffett Pl.
6. 204 Wm. Moffett Pl. - 302 Wm. Moffett Pl.
7. Industrial/Storage/office - 94 Frederic Lopez Rd.
B&C
8. Retail/Office - 6100-A Francis Botello Rd.
9. Retail/Office - 6150-D & E Francis Botello Rd.
10. R& D government lab. - 6190-A Francis Botello Rd.
11. Airport Admin/offices - 601 Norman Firestone Rd.
12. Back Up SOC/storage
13. Office/Industrial - 629-A Norman Firestone Rd.
14. FBO Terminal/Hangar - 515 Robert Marxmiller Pl.
15. Maintenance Hangar 3 - 303 John Donaldson Pl.
16. Office/Industrial - 53-A Gerald Cass Pl.
17. R&D/Industrial - 20 Dean Arnold Pl.
18. Airport Maintenance/Offices - Maintenance Bldg.
19. Hangar 2 - 1495-A Cecil Cook Pl.
20. Office/Storage - 1407 Norman Firestone Rd.
21. Office - 1501 & 1503 Cecil Cook Pl.
22. Office - 1523 Cecil Cook Pl.
23. Industrial/Storage - 101-A Dean Arnold Pl.
24. U.S. Forest Service - 90 Dean Arnold Pl.
25. Hangar 1 - 1601 Cecil Cook Pl.
26. Offices/R&D - 1520 Cecil Cook Pl.
27. R&D - 1440 Cecil Cook Pl.
28. Offices/Retail - 100-A Clyde Adams Rd.
29. Offices - 1409-B Norman Firestone Rd.
30. R&D - 1411 Norman Firestone Rd.
31. Starter Shack/Restroom - Golf Course
32. Pro Shop/Clubhouse - 6030 Hollister Ave.
33. Retail/Tire Repair - 6010 Hollister Ave.
34. Car Dealership - 6290 Hollister Ave.
35. Car Dealership - 6291 Hollister Ave.



Public Works Department – Parking Garages & Open

Parking Lots:

- 36. Parking Structure # 2
- 37. Parking Lot # 3
- 38. Parking Lot # 4
- 39. Parking Lot # 5
- 40. Parking Structure # 6 - Granada Garage
- 41. Parking Structure # 7 – Library
- 42. Parking Lot # 8
- 43. Parking Structure # 9 – Lobero
- 44. Parking Structure # 10
- 45. Parking Lot # 11
- 46. Parking Lot # 12
- 47. Railroad Parking - Depot Parking Lot # 13
- 48. Cota Commuter Lot
- 49. Carrillo Comuter Lot

Water Treatment Department:

- 50. William B. Carter Water Treatment Plant

Waste Water Treatment Department:

- 51. El Estero Treatment Plant

Waterfront Department:

- 52. 90 minute parking
- 53. Harbor Parking Lots
- 54. Launch Ramp Parking
- 55. 107 Lease Area
- 56. 113 Lease Area
- 57. 117-A Lease Area A-H
- 58. Marina 2 Restroom Building & adjacent walks
- 59. Marina 3 Restroom Building & adjacent walks
- 60. Marina 4 Restroom Building & adjacent walks
- 61. 119-B Lease Area
- 62. 125 Lease Area
- 63. 132 Lease Area
- 64. 217-1 Lease Area
- 65. 219 Lease Area
- 66. 219-F Lease Area
- 67. 221 Lease Area

- 68. Marina 3 - Boat docks
- 69. Galley Snack Shop
- 70. Stearns Wharf site

H. TRANSITION PLAN PROCESS

The detailed and comprehensive ADA Survey report findings were used as a basis for the preparation of the ADA Transition Plan, as well as the program accessibility analysis and several levels of prioritization criteria. Below is a description of the methodology followed:

- Conduct detailed and general accessibility surveys and reports.
- Once the survey reports were completed we analyzed and summarized the survey findings.
- Prepared a program accessibility form, train City staff to complete the forms. The forms contained a list of programs and services that take place at each facility.
- After the forms were completed for each facility that was evaluated with general and detailed surveys, we analyzed its findings.
- Explored different non-architectural solutions.
- Identified the architectural barriers that need to be removed in order to provide program accessibility using the survey data after exploring the possibilities to provide other non-structural and less costly solutions.
- Summarized the recommendations and budgetary cost estimate for program accessibility barrier removal at each of the 9 priority City facilities with detailed surveys.
- Applied the overall priority criteria analysis, derived from an interactive process with City staff, to prepare the Transition Plan.
- Prepared the Transition Plan schedule for barrier removal required to provide program accessibility, including a 45% soft costs above and beyond the construction cost and a



- compounded inflation factor-Construction Cost Index of 4.5%.
- Obtained City staff's input and comments.
 - Obtained public users input and comments.
 - Finalized the Transition Plan incorporating public and staff comments.
 - Nominated the official responsible for implementation.
 - Present to the City Council for approval and adoption.

I. TRANSITION PLAN PRIORITIZATION CRITERIA

The ADA Transition Plan has been an interactive process between the Consultant and the City of Santa Barbara's staff. We had several meetings and discussions where the Consultant obtained pertinent information from City staff and through a collaborative process developed the Transition Plan.

The prioritization of barrier removal has been done at two levels:

- The initial priorities were set during the Accessibility Survey process, where we assigned to each barrier one of 4 priority levels according to the severity of the barrier and whether or not the barrier prohibits access to the facilities. For the detailed surveys, each barrier or item was assigned a priority. For the general evaluation reports, general priorities were assigned to each of the eight categories that the survey had: arrival to the entrance, parking, entrance to the program, within the program, restrooms, drinking fountains, telephones and work areas.
- The second level or prioritization took place after we analyzed the survey findings and the program accessibility forms were completed by staff, we performed a Program Accessibility analysis, evaluated priority levels within each type of facility ranking them in order of priorities and finally we established overall priorities looking at the institution in its entirety.

The ADA Transition Plan prioritization criteria has been reviewed by staff at the Steering Committee meetings as well as presented to the



public at the Public Outreach meetings as part of this Transition Plan process, to obtain the input of persons with disabilities and stakeholders.

Other than the four levels of priorities that were set in the Accessibility Survey reports, we discussed and analyzed different overall priorities criteria derived from the analysis of the Accessibility Survey findings, program accessibility evaluation and looking at the City accessibility issues in their entirety with the participation of persons with disabilities that attended the public outreach meetings.

At the public outreach meetings, persons with disabilities also had the opportunity to express the need for barrier removal on specific issues that affect them directly and they consider should be given priority by the City to address. These issues are listed in section I.3 –Specific Stakeholders priorities below.

The result of this interactive process is summarized below:

PRIORIZATION CRITERIA USED:

I.1 SURVEY PRIORITIES:

I.1 Accessibility Survey Priorities – Severity of barriers (4 priorities)

I.2 TRANSITION PLAN PRIORITIES:

I.2.1 Program Accessibility Analysis

I.2.2 Facility Type Priorities

I.2.3 Overall Priorities – Viewed City in its entirety

I.3 SPECIFIC STAKEHOLDERS PRIORITIES:

This analysis, evaluation and prioritization processes lead us to develop the Transition Plan summarized in several spreadsheets enclosed in this Transition Plan update report.

These criteria were validated with the users and public input during the ADA Transition Plan Community Outreach meeting and the public review and input period.



Below is a more detailed description of these prioritization criteria:

I.1 ACCESSIBILITY SURVEY PRIORITIES

The first level of prioritization criteria took place during the survey process. The priorities indicated for each barrier in the Accessibility Survey reports for 9 City priority facilities are based on the following criteria:

Priority 1: Hazardous conditions for buildings and site

Priority 2: High, items that impede accessibility to facilities or site

Priority 3: Medium, facilities or site areas that are usable by individuals with disabilities but have elements that are not code fully compliant but that will enhance accessibility

Priority 4: Low, usable facilities or site areas but with minor code deviations

I.2 TRANSITION PLAN PRIORITIES:

I.2.1 PROGRAM ACCESSIBILITY ANALYSIS:

The analysis of program accessibility is one of the key elements to the development of a Transition Plan. **The ADA does not require a public entity to make all of its facilities fully accessible.** The requirement is to provide program accessibility as defined earlier in this document. In order to do this analysis we followed the steps listed below for the **9 detailed survey facilities**:

1. List of programs and services
2. Location-facility
3. Primary function access issues
4. Selective barrier removal
5. Barrier removal cost from survey reports

The important outcome of this analysis is to determine what barriers should be removed at each facility in order to provide program accessibility to the primary functions. As part of this process, other non-structural and less costly solutions were explored. Once the program analysis was completed and the selective architectural barriers that needed to be removed at each facility in order to provide



program accessibility were identified, we extracted the cost to remove these barriers from the ADA Survey reports. The next step was to continue with the other levels of prioritization by facility type, i.e. buildings, parks, recreational facilities, libraries, parking lots/garages, etc., ranking each facility within each group in order of priorities and the last step was the overall City wide prioritization explained below.

I.2.2 FACILITY TYPE PRIORITIES:

The priorities for Accessibility Physical Barrier Removal priority projects list included below was based on several sources of information the input of different stakeholders; staff; steering committee, Accessibility Advisory Committee to Staff (AACCS) and recommendations from the Accessibility Consultant.

The City of Santa Barbara's general community input and in particular from the Disability Community was obtained during the First Public Outreach Transition Plan Input Meeting held on February 28, 2007.

As part of this meeting the community had the opportunity to participate in the prioritization for Accessibility Physical Barrier Removal projects, indicating their priorities at the departmental level, priorities for the City's 9 priority facilities that will have detailed surveys with budgetary cost estimates. The disability community was also asked to list the most important types of physical barriers that from their users perspective impede access to City facilities, programs and services and a list of specific priority projects. In giving their input, the community was asked to think of the buildings and facilities they frequent the most having a greater intensity of use, as well as the nature of the service provided within the facility.

The results of the community input regarding the different levels of priorities is summarized below:

I.2.2.1 Priorities by Facility Type - General Fund 9 Priority Facilities that had Detailed Surveys including budgetary cost estimates

1. City Hall and Annex
2. Central Library
3. Cabrillo Pavilion Arts Center and Bath House



4. Police Station
5. Westside Community Center
6. Community Development/Public Works
7. McKenzie Park
8. Alice Keck Park
9. Eastside Library

I.2.3 ANALYSIS OF OVERALL CITY PRIORITIES:

The City of Santa Barbara facilities were ranked in order of priority from high to low, taking in consideration the intensity of public use, the type of programs offered, the current level of accessibility, the geographical location, uniqueness of the program. For parks/trails other than the current level of accessibility, the level of development was also considered.

The conclusions of this analysis are indicated below:

I.2.3.1 Prioritization by Departments within General Fund and Enterprise Facilities – Viewing the City facilities in its entirety

- **General Fund:**

The departments were ranked in the following order of priority in terms of intensity of public use and the nature of the program offered.

1. Libraries
2. City Administration Services *at City Hall*
3. Parks and Recreation
4. Community Development / *Public Works*
5. Police
6. Fire Stations
7. Intra City Services

- **Enterprise Fund:**

1. Parking
2. Airport
3. Waterfront
4. Golf
5. Water Fund
6. Waste Fund



I.3 SPECIFIC STAKEHOLDERS PRIORITIES:

At the public outreach meetings, the stakeholders and persons with disabilities that attended these meetings facilitated by the Accessibility Consultant indicating that the items listed below are of high priority:

I.3.1. List of priorities based on the type of barriers to be removed:

- Detectable Warnings
- Pedestrian Audible Signals – *prioritized by traffic volume*
- City’s Website compliant with 508
- Overhead Obstructions – trim trees and vegetation protruding into the pedestrian path of travel
- Sidewalks uneven surfaces caused by tree roots
- Sidewalks pavement dislocations – temporary sidewalk patches left too long
- Installation of new curb ramps to complete *key* path of travel routes
- Lever hardware
- Door pressure at priority building entrances with power operated doors - adjust door closers at other doors
- Sensitivity training for City staff
- Facilities Evacuation Plan and overall City’s Emergency Evacuation Plan and preparation for persons with special needs
- Care provider notified in emergency
- Accessible shelters – provisions for guide dogs
- Access to parking lots *at “ticket spitters”*
- ADA training for City staff

I.3.2 List of specific priorities be removed:

- Eastside Bath House sidewalk repair – uneven surfaces
- Curb cuts on Cota and Laguna streets

- Power door at Davis Center *needs adjustment*
- Turn on and maintain power door at Main Library in working condition
- Installation of double swing doors – cost effective solution when door strike clearance is difficult to meet
- City Hall elevator
- *Tactile identification on sidewalks for bus stops*
- *Curb cuts at Montecito Street near Edison Avenue*
- *Better access along Coast Village Road*
- *Other comments and discussions*
- *Involve the Downtown Organization in training for ADA access requirements*
- *Provide a sheet of ADA resources*
- *Comments submitted by Judy Gilder:*
 - a. *Please make the Stow House wheelchair accessible and add it to the MTD route,*
 - b. *Make the Chumash Casino Shuttle bus wheelchair accessible,*
 - c. *All buses should have better wheelchair tie downs,*
 - d. *All things / places should be accessible (ADA compliant).*

The input included in the prioritization of the Transition Plan included also input from:

ADA Public Use Survey

Another methodology used by GPPA to gather public input was the ADA Public Use Survey that was distributed at the First Public Outreach meeting and via email to several organizations for persons with Disabilities.

Input from Accessibility Steering Committee:

The final prioritization for Architectural Barrier Removal projects also includes the review and input from the Accessibility Steering Committee.



Input from Accessibility Advisory Committee to Staff AACS:

The input from the Accessibility Advisory Committee to Staff (AACS) was also considered in the enclosed list of prioritized Architectural Barrier Removal projects to be included in the initial Capital Outlay program for the next couple of years.

J. TRANSITION PLAN FINANCING METHODS

Policy Statement regarding Methods of Financing the Transition Plan

1. Any new construction will be performed to meet all applicable codes.
2. If a facility gets refurbished, the area of alterations and path of travel to the area of alteration shall be made code compliant.
3. The City when doing ongoing maintenance of its facilities will insure that the items replaces meet current accessibility codes and regulations.
4. The City will make sure that possible leases of space shall comply with the applicable accessibility regulations.
5. The Transition Plan barrier removal projects will be budgeted and included in the Capital Improvement projects as part of the City's yearly budgeting process.
6. The City will make all efforts necessary to apply for available grants or look for additional funding sources to implement the Transition Plan barrier removal.

K. RESPONSIBLE INDIVIDUAL FOR IMPLEMENTATION OF TRANSITION PLAN



The City of Santa Barbara has appointed the **City Manager** as the responsible individual for the implementation of the Transition Plan.

The ADA Compliance Officer for facilities, policies, practice & procedures and the communications Section 504/508 will support the City Manager in its efforts to implement the ADA Transition Plan.

The Department Heads are responsible for the implement the ADA Transition Plan and overall access compliance in their own departments.

A detailed City of Santa Barbara ADA Compliance Structure has been established as part of the Self-evaluation Update. ***Refer to Self-evaluation Update report, Chapter 3.A ADA Compliance Structure.***

L. INTERIM SOLUTIONS

The City of Santa Barbara Transition Plan implementation, similar to other municipalities, will be a lengthy process, due to the high cost of barrier removal and funding availability. The fact that it will take many years to implement the barrier removal does not relieve the public entity from its obligations to provide program accessibility under the ADA.

It is important that the City of Santa Barbara develops policies for **interim solutions** in order to provide equivalent facilitation to members of the public that need special accommodations. There are several methods that can be used in assuring program accessibility, including relocation of the program, service, or activity to an accessible non-City-owned location until City owned facilities are made accessible. Another method of providing program accessibility with nonstructural solutions includes but is not limited to providing adaptive equipment, bringing the program to the individual, or providing additional staff to assist the individual with their specific needs.



The other aspect that needs to be considered in providing program accessibility is the requirement to provide effective communication, which could include providing written information in alternative formats, providing assistive technology, providing reasonable accommodations as requested by the public, making City meetings and public events accessible, etc.

The City uses several methods of providing interim solutions in an effort to look for ways to accommodate persons with disabilities to have access to their programs services and activities. The current methods of providing program accessibility are described in the program accessibility evaluation forms that were completed by City staff as part of this Transition Plan update. Refer to Transition Plan Technical Appendix TA-B, item 2 – Program Accessibility Form for General Fund Facilities and Appendix A-C, item 2 – Program Accessibility Form for Enterprise Fund Facilities.

The City of Santa Barbara is committed to make every effort to accommodate the needs of persons with disabilities. Another mechanism to provide reasonable accommodations until facilities can be made accessible is the use of the Complaint Form and procedure that have been updated as part of this Self-Evaluation update and are posted on the City's website.

Recommendations:

A general recommendation is to provide informational and directional signage as needed to convey the information to facility and program users regarding the interim solutions and accommodations that the City has in place to provide program accessibility.

Continue working with the AACS Accessibility Advisory Committee to Staff to develop additional methods of insuring interim program accessibility solutions to areas that have not yet been addressed and that are needed to obtain access to City's programs, services and activities.