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## A. ADA COMPLIANCE STRUCTURE

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As part of the Self-evaluation update, the City of Santa Barbara updated its internal “ADA Compliance Structure”, in order to have an organized and efficient way to address the various areas for compliance under the Americans with Disabilities Act (ADA).

In order to visually illustrate this internal staff organization, the City developed an ADA Compliance Structure organizational chart called “City of Santa Barbara ADA Compliance Structure”, see **Appendix A.1** at the end of this section.

At the top of this organizational chart is the City Administrator, followed by the ADA Coordinator. As required by the ADA, the City of Santa Barbara has designated its City overall ADA Coordinator (ADA & Section 504 Coordinator) as the central point of communication for ADA compliance. (Refer to **Chapter 6, part B** for additional information regarding the ADA Coordinator.)

The City has also been working for several years with the Accessibility Advisory Committee to Staff (AACS), which works closely with City staff on an ongoing basis to provide valuable input regarding barrier removal priorities and other related accessibility issues, as needed. As part of this Self-evaluation update, new members have been added to the committee, representing a variety of disabilities, to insure that their diverse and sometimes conflicting needs are included in the decision making process.

The chart illustrates how each of the three main access compliance areas is structured: Program Accessibility, Facilities Accessibility and Employment Accessibility.

After the Transition Plan and Self-evaluation update process is complete, it is anticipated that the full ADA Compliance Committee will meet at least semi-annually to discuss overall compliance. The committee may initially meet more often on as-needed basis. Committee members will also share information with each other, as appropriate, via electronic media.



The Facilities Compliance Staff in charge of existing City facilities, the public rights-of-way, and new City facilities will also meet separately, at least on a quarterly basis, with the AACS committee. The City's ADA Coordinator will attend these meetings to provide administrative updates and seek advice on the City's various program accessibility efforts. Human Resources (HR) and department liaisons will attend these meetings only if there is some reason for them to attend.

The organizational chart also indicates the links between key areas of interdependence.

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## B. CITY'S PROCUREMENT POLICIES AND PRACTICES

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As part of the Self-evaluation update, the City of Santa Barbara also reviewed its procurement policies and practices, to ensure to the extent practical that all equipment, products, and services purchased by the City of Santa Barbara for upgrading its facilities or for public use meet the federal and state accessibility codes and regulations. This greatly contributes toward having all City activities, programs and services accessible and usable by persons with disabilities.

Another aspect of procurement is to ensure non-discriminatory hiring practices, see section B below.

### *B.1 Findings:*

#### *B.1.1 Service Purchases:*

It is the policy of the City of Santa Barbara to include in its purchase of services and in all contracts with service providers, consultants and vendors, statements of non-discrimination in employment.

#### **Non-discrimination Ordinance:**

Pursuant to its non-discrimination policy, the City of Santa Barbara includes a section on non-discrimination in employment in the body of every service contract and attaches the "Non-discrimination Ordinance" as an appendix to all such contracts, see paragraph below:

**“PROHIBITION AGAINST DISCRIMINATION**

Section 9.126.020 of the Santa Barbara Municipal Code, prohibiting unlawful discrimination in employment practices is attached and described in Exhibit B and incorporated herein by reference. Contractor shall fulfill all obligations of a contractor under the provisions of such section.” (A copy of this is attached as **Appendix A.4.1 and in A.4.2 - Contractor’s Nondiscrimination Employment Certificate.**)

*Appendix A.4.1 contains three discrimination related chapters of the City’s Municipal Code*

*Chapter: 9.123 Non-Discriminatory Employment Provisions for all Contracts of the City*

*Chapter: 9.130 Non-Discriminatory Provisions for Leases*

*Chapter: 9.132 AIDS/HIV Discrimination*

Gilda Puente-Peters, Architects (GPPA) recommends the term “*physical handicapped*” used in these non-discrimination ordinance documents be replaced with the updated term required by code: **“disabled” or “disability”**, as appropriate.

Purchasing relies upon the requesting department to include the appropriate requirements in their scope of work specifications. Purchasing is in the process of drafting a specifications checklist for staff, which will provide guidelines to staff for fulfilling their responsibilities for living wage, insurance, ADA, and sustainability when developing specifications for goods and materials and scopes of work for services.

***B.1.2 Products and Equipment Purchases.***

The City of Santa Barbara currently includes a non-discriminatory statement in its purchase of equipment and products. This statement is located in Article XI of the terms on the back of the purchase order - “*Seller agrees to comply with the requirements relative to Non-discriminatory provisions of Title 9 of the Santa Barbara Municipal Code*”.

Departments developing the product specifications are responsible for incorporating the appropriate ADA requirements into the specifications. The following examples show how the City has been accomplishing this.



- The City of Santa Barbara Public Works Department, Building Maintenance already takes a proactive approach to maintaining the accessible-compliant features on buildings. It is the department practice to specify ADA-compliant fixtures and hardware to the greatest extent possible when replacing non-compliant models.
- The City of Santa Barbara Parks and Recreation Department also has a similar practice of specifying accessible products when performing routine maintenance.
- The Parks Division manages all of the City's parks and open spaces with the highest regard to accessibility. All new construction is designed to meet or exceed accessibility guidelines.

Playgrounds are a particular focus of the Division and are built to meet State guidelines on accessibility, including use of accessible surfacing such as pour-in-place rubber and equipment that allows access by all users.

As discussed above, the specification checklist currently under development will assist with department's efforts to comply.

### *B.2 Recommendations:*

The intent of the recommendations included in this section of the report is to provide guidance to the responsible staff within the City to insure that procurement of services, products and equipment for maintenance of existing facilities and design of new facilities, or for use by the public, are in compliance with the Americans with Disabilities Act (ADA) and State Accessibility Codes and Regulations and that the end results are environments that are accessible and usable by persons with disabilities.

#### *B.2.1 Service Purchases:*

Other than the non-discrimination statements currently included in all City of Santa Barbara service contracts, we recommend that the City provide the following:



### *B.2.1.1 Statement of compliance with the Law:*

The consultant has recommended that the City add a statement of full compliance with accessibility standards in providing services, not limited to non-discrimination in employment. The intent is to ensure that the provision of services and the results of such services may be made accessible to people with disabilities, as appropriate. Based on this recommendation, the City will be adding language to its contracts and purchase orders for services similar to the following:

“Americans with Disabilities Act (ADA) Title II Requirements. If this solicitation contemplates the provision of services to the public, vendor shall, in addition to any other requirements under Title II of the ADA, comply with the Title II requirements of the ADA regarding the accessibility of City services and programs, as an explicit requirement. Vendor assures that, at all times during the performance of any resulting contract or purchase order, no qualified individual with a disability shall, by reason of that disability, be excluded from participation in, or be denied benefits of, services, programs, or activities performed by vendor for the benefit of the City.”

### *Proposed Action:*

Modify language in service contracts to incorporate this recommendation.

### *B.2.1.2 Resources to Provide Specialized Services:*

Currently the City has a policy to provide accommodations to persons with disabilities requested with advance notice for its public meetings and other services, programs and activities. For sake of efficiency and to facilitate this process, the Consultant has recommended that the City establish contacts with businesses or persons who provide specialized services such as: qualified sign language interpreters, translators, Computer-Aided Real-Time Reporting (CART), Braille printers, etc.

Based on this recommendation, City staff has developed a list of resources to provide assistive communication and other aids



and services. This list has been posted to the City's internal Portal system and is readily accessible by all City staff. The City has also promulgated an "Assistive Communications Request Policy" which, among other things, ensures that staff is aware of the availability of these resources.

*Proposed Action:*

Continue to publicize and update a list that provides ready access to contractors who can be engaged to provide assistive services.

*B.2.2 Products and Equipment Purchases*

Pursuant to the City's nondiscriminatory policies, this section provides advice to staff and City's consultants regarding the criteria for selection the of products and equipment that meet accessibility code and regulatory compliance as well as usability by a wide range of users including persons with a variety of disabilities including but not limited to mobility, sensory, cognitive and other physical disabilities.

*B.2.2.1 Purchase Orders Statement of Compliance:*

Include in applicable purchase orders for new construction, alterations, and maintenance of City owned facilities or for equipment designated for public use the statement that all such products purchased by the City of Santa Barbara are not only to meet the Municipal Code requirements, but also federal and state accessibility codes and regulations, so that they are accessible to and usable by persons with disabilities. Sections B.2.2.2 through B.2.4, below, contain guidelines and criteria that staff can use to ensure the purchase and proper installation of accessible products.

*B.2.2.2 Accessible Products and Equipment Standardization*

The industry has developed many products and there are many vendors selling accessible products and equipment. Additionally the Construction Industry is continually developing new products



and technologies, so it is important to be familiar with the latest advances of the industry.

An important consideration is the standardization of equipment and products Citywide, in order to lower their equipment purchasing costs and streamline the maintenance efforts when equipment, parts of it, or other products need to be replaced.

Any existing Project Design and Construction Standards, including standard plans and details needs to be updated regularly to reflect the latest accessibility code and regulatory changes as well as product and technological advances.

### *B.2.2.3 Accessible Products and Equipment Selection Criteria*

This is advisory information that can assist City staff in establishing general guidelines for selection and purchase of accessible equipment and products. The purpose of these guidelines is to assist staff and consultants in the selection process, so they can make educated decisions.

There are many products in the marketplace that have labels that indicate “ADA compliance” or “ADA approved” products. Unfortunately, until there are proper mechanisms to test and certify accessible equipment and products there are still many products that, despite their labels, are not usable by the intended persons with disabilities.

This task of product selection can be difficult, so it is important that staff and consultants working for the City on specific design and construction projects understand the ergonomics of different disabilities and what to look for in the research for each type of accessible product.

In order for staff to make purchasing decisions it is important to request product samples where applicable. City staff should determine when this would be applicable and test the product’s design and operable mechanisms for functionality and usability. In some special instances it is recommended to have the Accessibility Advisory Committee to Staff review them.



The following are some important general criteria and recommendations for the selection of accessible products and equipment for City facilities and public use, which includes some of the criteria, established in the Universal Design principles:

**a. Operable Mechanisms – Low Physical Effort:**

Careful attention should be given to the selection of products that require operable mechanisms, to insure that they do not require tight grasping, pinching or twisting of the wrist and no more than 5 lb. maximum effort to operate. Everyone should be able to use the building features comfortably and with minimal fatigue.

Examples of these types of operating mechanisms are: paper towel dispensers, sanitary napkin and tampon dispensers, soap dispensers, faucets with push buttons, drinking fountain push buttons and levers, vending machine operating mechanisms, elevator push buttons, and automatic door push plates. For doors, the requirement is for them to operate with the minimum effort up to a maximum of 5 lbs. force for both exterior and interior doors. Fire-rated doors must close and latch securely and may be adjusted to have more operating force, up to 15 lbs. max., but only if determined to be needed by a Fire Marshal. (2001 CBC Title 24)

**b. Flexibility of Use – Wide Range of Users:**

Another important equipment and product selection criteria is to select products that are flexible and can be universally used by the greatest number of people as possible. Flexible products should respond to the needs of children, adults, right handed and left handed people, as well as people with a wide range of functional abilities and individual preferences.

For instance, select a drinking fountain type that allows for greater knee clearance than the minimum 27" high specified by code, since there are tall wheelchair users who require a greater knee clearance. At the same time the maximum 36" high to the bubbler must be maintained. It is also required to





have high and low drinking fountains. The high serves persons with difficulty bending and tall people and the low accessible type serves persons using wheelchairs, children and persons of short stature.

**c. Simple and Intuitive:**

Another important equipment and product selection criteria is to select products that are simple, that is, easy to understand their use regardless of the user's experience, age, knowledge, language skills or concentration level and physical function.

An example would be a simple lever type faucet handle that is easy to operate, instead of a more complicated type hardware found sometimes in showers. The operating system can be too difficult to use.

**d. Tolerance for Error – Minimizes Hazards:**

Select products that minimize hazardous conditions, adverse consequences or accidental or unintended actions by all users. Product safety is especially important in a public building or facility environment.

***B.2.3 Products and Equipment Installation, Size and Space for Approach and Use:***

Beyond the product selection with the appropriate code required sizes and operating mechanisms, it is as important that the equipment is properly installed. It is critical for usability and functionality to consider the size and space provided for approach, reach, manipulation and use regardless of the users' body size, posture or functional abilities. Reach range code requirements need to be carefully adhered to as well as maneuverable space requirements.

It is also important to follow the code requirements with respect to installation, location and whether the specific placement of an item will create a protruding object from the wall (more than 4" from the wall if it's more than 27" above the floor) or overhead obstruction (under 80" high within the accessible path of travel). This will avoid



creating hazardous conditions for persons with low vision and persons who are blind. Careful thought should be given in determining size, shape and location of objects.

#### *B.2.4 Types of Accessible Products and Equipment:*

There are many accessible products and equipment that may be used for the new construction, alterations and maintenance of City, owned facilities and for equipment for public use. GPPA recommends to use the criteria outlined above and to obtain samples for testing of proposed products. This should ensure that the products selected are indeed accessible to persons with different types of disabilities. Do not rely only on manufacturer advertised “accessible products” including those carrying the International Symbol of Accessibility (ISA - the wheelchair symbol), since some of these products do not indeed meet all the accessibility requirements, like force to operate mechanisms, or avoiding the need for tight grasping, pinching or twisting of the wrist to operate, etc.

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## C. CITY'S PRIVATE AND PUBLIC EVENTS AND MEETINGS POLICIES AND PRACTICES

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Some City facilities that are used for meetings and events have barriers to accessibility. As part of the Self-evaluation update, the City staff reviewed current policies and practices, with the goal of developing an organized and efficient way to address potential barriers to accessibility.

### *C.1 Findings:*

There are three types of meetings and events covered by City policies.

City Events: The first type is public meetings and events that the City itself holds and which are open to members of the public (“City meetings and events”). For all such City of Santa Barbara meetings and events, the City includes an ADA notice providing a contact number for requesting assistive aids or services in advance, and will



make reasonable accommodations to ensure that people with disabilities have an equal opportunity to participate.

Outside Events - Private: City facilities are also used by outside entities for special meetings and events, particularly Parks and Recreation Department facilities. The first type is “private” outside events, where the event is open by invitation only (e.g. private meetings, weddings, etc.).

Outside Events - Public: The third type is “public” outside events, which are open to the general public, with no invitation required (e.g. open meetings, concerts, plays, etc.). The City includes a non-discriminatory statement in all its special events contracts. As part of this Self-evaluation process, the City has reviewed its policies with regard to events and meetings. The contract with the facility user is developed based on the event or meeting scope of use (size, purpose, equipment, etc). City staff work with the facility user to determine site layout and either suggest or require, based on facility limitations, a number of other event requirements such as parking, number of restrooms, safety of structures, alcohol limitations, open and accessible pathways, etc.

### *C.2 Recommendations:*

For the City’s own public meetings and events, the City should continue to maintain the highest standard of accessibility. As part of the City’s Self-evaluation process, the City has updated its communication policies and resources, as described further in Chapter 4 of this ADA Self-evaluation update report.

For both public and private outside events, in order to maintain a uniform standard required for event and meeting organizers and to improve ADA accommodations, the City will provide all meeting and event organizers with descriptions of any barriers to accessibility at the particular facility so they will be able to better evaluate their needs. During the initiation of the facility use permit, staff will meet with the organizer to determine event requirements and how organizers can address accessibility barriers in the proposed event design. The City’s updated policy is contained in C.3, below.

### *C.3 Updated Policy for Public and Private Outside Events:*



The following modifications will be added to the event and meeting planning process for those meeting and events held in City facilities by outside entities.

For “private” outside events or meetings, staff will:

1. Identify accessibility barriers at City facilities
2. Inquire about anticipated accessibility needs of the user
3. Suggest possible accommodations or alternate facilities.

For “public” outside events or meetings, staff will:

1. Consider accessibility when selecting locations for public meetings
2. Identify accessibility barriers at City facilities
3. Inquire about anticipated accessibility needs of the event
4. Advise organizers of public events of their obligations as providers of public accommodations
5. Suggest possible accommodations or recommend alternate facilities. In some cases, specific accommodations will be required depending on the scope and purpose of the event.
6. Add an accessibility acknowledgement to the facility use permit signed by the event organizer.

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## D. CITY’S PUBLIC RIGHTS-OF-WAY GENERAL POLICIES AND PRACTICES

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As part of the Self-evaluation update, the City of Santa Barbara reviewed its public rights-of-way policies. Refer to findings and recommendations discussed in this section.

### *D.1 Findings:*

The most current Public Right-of-Way policies for the City of Santa Barbara are contained in the Pedestrian Master Plan and in the Circulation Element of the City’s General Plan (Volume 3). GPPA’s summary of findings is discussed below in items D.1.1 and D.1.2. Item D.1.3 discusses the current practice regarding criteria for new curb ramp installation.



City Public Works Department staff meets regularly with the Accessibility Advisory Committee to Staff (AACCS) to update them on right-of-way project status under the Streets Capital Program, including the status of curb ramp and sidewalk link improvements in major pedestrian corridors.

#### *D.1.1 City of Santa Barbara Pedestrian Master Plan*

The City's Pedestrian Master Plan document, adopted in July 2006, notes the City's existing policy regarding many accessibility issues within the public right-of-way. This Master Plan was developed in response to Goal 5 of the Circulation Element of the City's General Plan: "Increase Walking and Other Paths of Travel: Develop a comprehensive system of pedestrian routes which are integrated with other modes of transportation and which provide safe and efficient paths of travel."

The Master Plan is a technical resource for the City and guides staff in the implementation of goals and policies from the Circulation Element. This document is available to the public on the City Public Works Department's website through the following link:

<http://www.santabarbaraca.gov/NR/rdonlyres/6F843C4B-D8FA-405F-A6B4-DD7E66795EDA/0/CirculationElement.pdf>

The Pedestrian Master Plan includes a detailed consideration of the need for access planning in the pedestrian rights-of-way (Chapter 3, pages 28-33). As part of the plan development, a survey was conducted to better understand access issues facing disabled people in the community. The survey is contained in Appendix B to the document. The survey was distributed to citizens of the City of Santa Barbara with the assistance of such agencies as the California Department of Rehabilitation, the Rehabilitation Institute, and our local Independent Living Resource Center.

Some of the other portions of this Master Plan that directly influence disabled accessibility issues include the following:

- 1. Chapter III contains an assessment of accessibility in each of 10 main City neighborhoods,*
- 2. Chapter IV contains goals and policies including the following:*



- a. *Goal 1- Policy 1.8: The City shall work with transit providers to develop high quality and pedestrian accessible transit stops.*
  - b. *Goal 1- Policy 1.9 The City shall work to make the pedestrian environment accessible to those with disabilities, children, and the elderly. Strategies under this goal include creating an ADA Transition Plan and retrofitting street corners, crossings, and transit stops that do not meet current accessibility standards.*
3. *Chapter V contains charts that detail missing sidewalks, curb ramps, and bus landings.*
  4. *Chapter VIII describes parameters and guidelines for the design and construction of the public right-of-way components, including many accessibility components such as curb ramps and detectable warnings.*

In GPPA's review of the design parameters and guidelines contained Chapter VIII, we noted the following issues:

1. Curb ramp details do not include detectable warnings.
2. A detail of a built-up curb ramp is included although this type is no longer allowed by code.
3. Curb ramp landing length indicated in chart to be 36" is less than required for the State code. The minimum curb ramp landing should be 48"x48". This chart makes reference only to Federal U.S. Access Board recommendations and not State CBC Title 24.
4. Figure VIII-1. Curb ramp components, and alternate ramp slopes, indicates alternate ramp slopes of 12.5% up to 3" rise max. and 10% up to 6" rise max. instead of 8.33% max. ramp slope.
5. Refuge and splinter islands do not include detectable warnings.



6. Bus stops do not include a 30"x48" space designated for wheelchair users to sit shoulder to shoulder adjacent to persons seated at the benches. When shelters are provided, the 30"x48" space designated for wheelchair users shall be located within the sheltered area adjacent to the benches.

#### *D.1.2 City of Santa Barbara General Plan*

The Circulation Element of the City's General Plan (Volume 3) was adopted in November 1997. In addition to Goal 5, which is the focus of the Pedestrian Master Plan, the Circulation Element includes many other goals, policies and implementation strategies that are relevant to accessibility issues within the public right-of-way. Most of the strategies in the Circulation Element related to improved paths of travel, pedestrian access, safety, transit options, and parking will directly have a positive impact on accessibility for people with disabilities.

This document is available to the public through the following link:  
<http://www.santabarbaraca.gov/NR/rdonlyres/6F843C4B-D8FA405F-A6B4-DD7E66795EDA/0/CirculationElement.pdf>

#### *D.1.3 Criteria for Installation of New Curb Ramps*

The current methodology used by the City to prioritize installation of new curb ramps is as follows:

- Based on public right-of-way best interests and priorities expressed by the public, the City boards and commissions, and the Accessibility Advisory Committee to Staff (AACS), Public Works Engineering staff makes recommendations to the AACS for their review and comment for the accessibility items within their purview. Staff considers all comments and creates and recommends a Streets Capital Improvement Program list of projects and associated budget based on available funding, priorities and other public right-of-way management decisions. AACS is comprised of volunteers, and it is a requirement that 51% of the committee be physically challenged. The AACS assists staff in prioritizing locations for new access ramps.



AACS current focus is to complete citywide "priority" access corridors including Chapala, Milpas, De La Vina, Gutierrez and Micheltorena Streets; Modoc Road and Coast Village Road and access to local medical and/or rehabilitation centers, e.g., the Braille Institute; parks and recreation areas; schools and grocery stores. A goal is to provide ADA access along at least one side of the street for these destination corridors. As the above "priority" corridors near completion, new corridors will be identified and prioritized with the committee's assistance.

### *D.2 Recommendations:*

GPPA recommends that the City of Santa Barbara consistent with the Pedestrian Master Plan strategies, take the following actions:

- Develop a public right-of-way ADA Transition Plan. **See Department of Justice, 28 CFR PART 35 §35.150 Existing facilities**, paragraphs (c) and (d).
- Revise and update design guidelines and standards for curb ramp construction, to include detectable warnings providing information needed by blind pedestrians to inform them that they are entering the vehicular way.
- Develop a Master Plan for location of new Audible Pedestrian Traffic Signals, including the development of specific design guidelines and standards.
- Adopt the U.S. Access Board guidelines for accessible construction barricades and scaffoldings.
- Develop standard details for blue zone accessible on-street parking and passenger loading areas including signage and loading zone access aisle.

GPPA recommends that the City of Santa Barbara, consistent with the goals established by the City of Santa Barbara General Plan (summary for accessibility related goals on item D.1.2 above), take the following actions:





- Ensure that transit stops design standards include space adjacent to benches within shelter when provided.
- Ensure that transit stops have alternate means of providing signage information to persons who are blind.
- Provide to the maximum extent feasible accessible means of transportation in the different methods of transportation provided or regulated by the city, since a great number of persons with disabilities rely on public transportation. These transportation systems include buses, taxis, shuttles, rail, trains, air, water taxi service in the Wharf and Harbor areas, etc.
- Provide accessible taxi passenger loading and unloading areas, including a striped 20'x5' access aisle and signage, when taxi passenger loading is provided.
- Insure that the parking design standards meet the latest accessibility codes and regulations, including detectable warnings at blended transitions and access aisles.
- When developing a signage program, include provisions for signage in alternative formats to convey information to the variety of users including persons with visual impairments. Insure that brochures and other methods of communication with the public include information about the accessibility of programs offered, i.e. tours, etc.
- Ensure that sidewalk and transportation accessibility criteria are included in the development of a pedestrian access to schools as well as accessible transportation systems.
- When providing benches within the public right-of-way, insure that a 30"x48" designated wheelchair space is provided to allow shoulder-to-shoulder companion seating with persons sitting on the benches.
- Ensure that the design guidelines and standards for the City's pedestrian system meet current state and federal accessibility regulations.



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## E. CITY'S MAINTENANCE OF ACCESSIBLE FEATURES POLICIES AND PRACTICES

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As part of the Self-evaluation update, the City of Santa Barbara also evaluated its practices regarding "Maintenance of Accessible Features", in order to ensure that City facilities and equipment are maintained accessible to persons with disabilities as required under the Americans with Disabilities Act (ADA), as outlined in the code section quoted below.

### **Section 35.133 of the ADA Regulations - Maintenance of accessible features.**

- The Preamble to the Final Regulations indicates that, "*Section 35.133 provides that a public entity shall maintain in operable working condition those features of facilities and equipment that are required to be readily accessible to and usable by persons with disabilities by the Act or this part. The Act requires that, to the maximum extent feasible, facilities must be accessible to, and usable by, individuals with disabilities. This section recognizes that it is not sufficient to provide features such as accessible routes, elevators, or ramps, if those features are not maintained in a manner that enables individuals with disabilities to use them. Inoperable elevators, locked accessible doors, or "accessible" routes that are obstructed by furniture, filing cabinets, or potted plants are neither "accessible to" nor "usable by" individuals with disabilities*".

The California Building Code Title-24 has provisions similar to the ADA regarding maintenance of accessible features.

This particular ADA requirement of maintenance of accessible features also applies to alternative programs and services established to provide program accessibility in lieu to physical accessibility.

#### *E.1 Findings:*

The City of Santa Barbara has an ongoing facility maintenance program performed by the Public Works Department staff. The City's



Building Maintenance Division already takes a proactive approach to maintaining the accessible features on buildings. Service contracts exist to maintain and repair elevators, wheelchair lifts, automatic door openers and the like. The Maintenance Division ensures all fixtures in City restrooms are functioning, both ADA-compliant and non-compliant. Additionally, the Building Maintenance Division specifies compliant fixtures and hardware to the greatest extent possible when replacing non-compliant models.

The Parks and Recreation Department's Maintenance Division also has a similar practice of specifying accessible products that are installed in compliance with the Federal and State regulations.

### *E.2 Recommendations:*

The intent of the recommendations included in this section of the report is to provide guidance to the responsible staff within the City to ensure that facilities and buildings that have been built to comply with the accessibility codes and regulations continue to be usable as intended in their design providing access and usability by persons with disabilities.

Pursuant to the City of Santa Barbara's goal to comply with the maintenance of accessible features requirement, GPPA recommends the following advisory practices and procedures:

- Assess the status of accessible features;
- Provide staff training regarding maintenance of accessible features; and
- Monitor the maintenance of accessible features.

#### *E.2.1 Assessment:*

Conduct an initial assessment of maintenance of accessible features at each facility.

The results of this initial assessment should be reported to the heads of each department to evaluate the initial status of compliance. This initial assessment report will be used as a



base line to measure the progress obtained in future assessments.

Each department can use these initial assessments to implement the required changes at each facility. The department heads should be responsible to monitor the department's implementation after trainings and tools have been provided to them.

Additional assessments/audits can be performed as deemed appropriate in the future to insure that facilities and equipment are maintained accessible to all users including persons with disabilities. See Monitoring section that follows.

### *E.2.2 Training:*

It is recommended that the City provide on-going City-wide Accessibility Awareness and Maintenance of Accessible Features trainings. The types of training that the City can provide are described in detail in the City's accessibility training program described in Chapter 7 of this Self-evaluation update report. Trainings should include but not be limited to:

Provide staff awareness trainings with regards to maintenance of accessible features for management and for maintenance staff.

Provide spatial usability training for staff at all City facilities, so they are aware of the locations within their work environments that they need to ensure are maintained accessible and usable by persons with disabilities.

### *E.2.3 Monitoring:*

Conduct periodically audits to insure and enforce that the established maintenance of accessible features parameters are met.

The heads of each department should be charged to make sure that the accessibility features provided at all primary function public use spaces and support service spaces including but not limited to restrooms, drinking fountains and public telephones,



are maintained functional and usable by persons with disabilities.

The results of these inspections should be reported to the department head, so he/she can evaluate the progress obtained towards compliance on each facility. The City as part of this Transition Plan Update has available a detailed inventory of physical accessibility barriers for 9 General Fund facilities, refer to Disabled Accessibility Surveys in **Technical Appendix A**. The City also has available general evaluations of physical barriers for 141 City facilities, refer to **Technical Appendices B and C**.

#### *E.2.4 Elements to be Maintained for Physical and Programmatic Accessibility:*

As the City updates its policies, creates new facilities, or modifies existing facilities, it adds accessibility features. In order for these accessibility features to remain usable by persons with disabilities, the following specific conditions need to be maintained.

##### *E.2.4.1 Physical Accessibility:*

Maintain exterior pathways and repair any surface irregularities that may become greater than 1/4" vertical drop due to pavement uplift, wear, cracking or potholes. Make other repairs as needed to keep pathways from causing hazardous conditions.

Maintain disabled parking spaces to have all required signage visible; trim tree leaves and branches as needed to not block signs. An ongoing routine maintenance of parking stripping should be established. Keep access aisles to the accessible parking spaces, and to the main entrances they serve, clear and usable. Instruct the facility administrators to monitor that accessible parking spaces are used by persons with legal disability placards and that access aisles are maintained clear of vehicles.

Maintain and replace as required all building signage that would direct persons with disabilities to the accessible paths



of travel and building entrances.

Maintain all doors including gates providing primary accessibility to be fully operable.

Maintain all doors to have operating forces as low as possible, but in no case more than 5 pounds for exterior and interior doors, with up to 15 pounds for fire-rated doors if determined to be needed by a Fire Marshal.

Maintain all elevators in proper working condition. Set up and monitor yearly maintenance inspections by contracted elevator maintenance companies and State Elevator Safety Unit for all elevators.

Maintain all wheelchair lifts in proper working condition. Set up and monitor yearly maintenance inspections by contracted lift maintenance companies and State Elevator Safety Unit for all lifts. Inspect more often if recommended by the manufacturer. If key operated, insure that staff keeps keys in a prominent place at facility main offices and that they are made available during business hours and all public functions. Maintain and monitor that wheelchair lifts are free of storage items.

Maintain all accessible plumbing fixtures, including toilets, urinals, lavatories, sinks, faucets, showers, and drinking fountains, to be fully operational and in compliance with accessibility codes. Ensure that non-fixed trash receptacles and storage items do not block the required path of travel, the maneuvering clearances at doors and the required space to use each fixture. At sinks mounted on built-in cabinets, insure that stored items do not block the required knee clearance space underneath the sinks.

Maintain all toilet accessories to be fully operational and mounted no more than 40" above the floor to the highest point needed to reach, at all accessible toilet rooms. Maintain all grab bars to be securely mounted and structurally sound. When replacing existing accessories, make sure that they are replaced with an accessible type, with operable mechanisms that do not required tight



grasping, pinching or twisting of the wrist.

Maintain and monitor objects mounted on walls to insure that they do not protrude more than 4" into accessible paths of travel, if the bottom is mounted above 27" high and below 80" high. This requirement helps maintain the accessible path of travel free of protruding obstructions that can be hazardous, mainly for persons who are blind or have low vision.

Maintain audible and visual fire alarms and pull stations to be fully operational. When replacing existing pull stations, make sure that they are replaced with accessible type, with operable mechanisms that do not required tight grasping, pinching or twisting of the wrist, and that can be operated with a single action. Mount between 42" to 48" high to the required reach point. Ensure that the path of travel and the space required to use fire alarm pull stations is maintained free of furniture or storage items.

Maintain fire extinguisher cabinets with their operable mechanisms mounted at 48" high maximum, and that the path of travel and space required for access is maintained free of furniture or storage items.

Monitor that all accessible counter sections are maintained in usable condition, free of storage, office equipment and other items.

Maintain and monitor that all specialized accessible equipment used in labs, and other specialized spaces is maintained in usable condition. Insure that the path of travel and space required for use at all specialized equipment is maintained free of furniture or stored items.

Maintain and monitor that all accessible furniture including picnic tables and adjustable tables are maintained in usable condition.

Maintain and monitor that the accessible exiting paths of travel from all buildings and spaces is maintained free of furniture or storage items and in usable condition.



Maintain and monitor that all accessible play structure components at parks as well as the accessible paths of travel into playgrounds and required usable space at each type of play structure are maintained in usable condition.

Maintain an accessible path of travel during construction, including the provision of accessible construction barricades, scaffoldings and signage.

Appoint a supervisory-level person within the Facilities Maintenance Department to be responsible for the replacement, repair, and modification of accessibility-related improvements. Such person shall coordinate proposed and report completed accessibility improvements to the City-wide ADA Coordinator.

#### *E.2.4.2 Programmatic Accessibility:*

Maintain the 9-1-1 lines and any other phone lines serving TDD/TTY's to be fully operational, and train staff that work with these systems. Train all City staff how to answer and handle incoming calls over the TDD/TTY's through the California Relay Services.

Maintain staff awareness and compliance with the City's new Assistive Communications Request Policy and the related list of available resources to insure communication effectiveness with all members of the public. See Self-evaluation Chapter 4, Communications.

If some testing or evaluations are required for participation in a City program, for instance a regular or specialized City recreational program, insure that testing programs include alternative formats of testing where necessary to accommodate the needs of participants with disabilities.