
Introduction

The Institute for Human Centered Design (IHCD) has prepared this report on behalf of the City of Stamford as part of the City’s on-going effort to assess the current level of ADA compliance in programs, services and activities and City-owned facilities. In preparing for the report, IHCD surveyed a selection of the City’s portfolio of facilities and properties that was included in the Request for Proposals. This report includes eight (8) municipal buildings, three (3) parking facilities and eleven (11) fire houses. Additionally, a total of 24 parks, were included in the survey of facilities.

This ADA Self-Evaluation report includes model policies and procedures for adoption by the City, and a summary of architectural barriers and proposed solutions for the City’s municipal buildings, parking facilities, fire stations and parks/open spaces. All are designed to help move the City towards full compliance with its obligations under the Title II of the Americans with Disabilities Act (ADA) and/or the CT State Code and Supplements.

Most City-owned facilities recently altered or renovated are substantially accessible and meet most architectural requirements. Continued facility replacements, alterations, and/or renovations will substantially reduce barriers and realize Stamford’s commitment to inclusion and equal rights. In the meantime, the greatest problems posed by existing barriers can be ameliorated by establishing policies and procedures to accommodate members of the community with disabilities. It is worth noting that the City has taken several significant steps in this direction:

- Stamford has hired a consultant (IHCD) to undertake its ADA self-evaluation (as basis for the City’s transition plan);
- Stamford has an ADA Coordinator in place, Ellen Bromley from the Social Services Department.
- Stamford has established the Mayor’s Committee on Access 4 All (A4A) - *a group of dedicated citizens and government representatives committed to improving access for all persons, regardless of ability, to Stamford’s public programs, properties and services.*

However, many key facilities and outdoor areas are “functionally accessible” meaning that they are generally usable by people with disabilities but are not in full compliance with current accessibility requirements, though they may have been compliant when they were built or last renovated – before 1991. The Government Center building is an example of such a “functionally accessible” facility: most programs can be accessed by most people because the building features accessible entrances, partially accessible toilet rooms, and has accessible

routes through most of the building; yet the building does not have accessible service counters, a key component to access some of the services provided by the City. And many individuals with mobility disabilities would have difficulty using the toilet rooms.

Some of the parks are also in this category. There are many accessible features and yet they lack accessible routes to key portions of the outdoor areas such as playgrounds, beaches, picnic areas, etc.

For clarity, this ADA Self-Evaluation report is organized as follows:

- Legal Overview
- Executive Summary of the Evaluation of Policies in Programs, Services, and Activities
- Executive Summary of the Evaluation of Facilities.

I. Legal Overview

The City of Stamford is obligated by both Federal and State laws and codes concerning the rights of people with disabilities in the daily provision of programs, services, and activities. At the end of this report, there is a comprehensive list of relevant laws and executive orders.

Federal Obligation: American with Disabilities Act (ADA)

Based on the 1964 Civil Rights Act and expanding upon the obligations of the 1973 Rehabilitation Act, the ADA prohibits discrimination against people with disabilities. The ADA provides civil rights protections to individuals with disabilities similar to those afforded to individuals on the basis of race, color, sex, national origin, age, and religion. The cornerstone of Title II of the ADA, which applies to state and local governments, is clear: no qualified person with a disability may be excluded from participating in, or denied the benefits of, the programs, services, and activities provided by state and local governments because of a disability.

The 2008 Amendments to the ADA (ADAAA), signed into law on September 25, 2008, describes in more detail the range of conditions covered by the civil rights protections of the ADA. The amendments expand the definition of “disability” to include impairments that substantially limit a major life activity and states that when determining whether someone qualifies as disabled, one cannot take into account assistive devices, auxiliary aids, accommodations, medical therapies and supplies. The amendments also address episodic disabilities that may go into remission but still can significantly limit a major life activity when active, such as epilepsy and post-traumatic stress disorder. The ADA defines a disability as¹:

- A physical or mental impairment that substantially limits one or more major life activities (i.e. working, talking, hearing, seeing, caring for one's self);
- Having a record of a physical or mental impairment that substantially limits one or more major life activities;
- Being regarded by others as having an impairment such as individuals with severe facial scarring.

¹ To learn more about qualified individuals with disabilities or to read the full text of the ADA, please visit <http://www.ada.gov>

It is important to stress that the primary obligation to public entities such as the City of Stamford, under Title II of the Americans with Disabilities Act, is to ensure that, when viewed in their entirety, the programs, services, and activities offered are equally available to people with disabilities. Cities are required to follow the 2010 ADA Standards for Accessible Design in new construction and major alterations. They also must relocate programs or otherwise provide access to programs located in inaccessible older facilities (i.e. facilities built before the ADA went into effect January 26, 1992). Ensuring program access may require capital investment when there is no alternative solution and should be a priority for corrective action.

Note that the websites of Title II entities are also considered “programs” and should be accessible to the standards of the Web Content Accessibility Guidelines 2.0 AA. Review of the City of Stamford’s website was not included in this scope of work.

Cities must **communicate effectively** with people who have hearing, vision, or speech disabilities. And they are required to make reasonable modifications to policies, practices, and procedures where necessary to ensure the equal participation of people with disabilities. In addition, the ADA requires the provision of “auxiliary aids and services” to meet their responsibility for effective communication.

Following the passage of the ADA, the Department of Justice issued the 1991 ADA Standards for Accessible Design to address physical access to facilities and transportation. These standards were based almost exclusively on the US Access Board’s guidelines (ADA Accessibility Guidelines – ADAAG). In 1994, slight technical amendments were made. Then in 2004, after years of public comment, the US Access Board issued new guidelines that were promptly adopted by US Department of Transportation and other federal agencies. But only in 2010 did the Department of Justice issue a revised and updated ADA Standard called the 2010 ADA Standards for Accessible Design (2010 ADA Standards) that would apply to all Title II and Title III entities. These standards revised requirements for policies such as ticketing and service animals, and for physical elements such as assembly seating, established construction tolerances for certain elements and formalized long-standing guidelines for play areas, recreational boating facilities, pools, and other recreational facilities.

Facilities that meet or exceed 1991 ADA Standards are not required to make changes to the new standards except in the case of significant renovation. For elements that are non-compliant, the corrective measures must align with the 2010 ADA Standards. It is not expected that the buildings will meet or be brought up to all of the 2010 ADA Standards absent significant or total renovation. State and local governments must ensure that individuals with disabilities are not excluded from services, programs, and activities because buildings are

inaccessible. This means Title II entities need not remove physical barriers, such as stairs, in all existing buildings, as long as they make their programs accessible to individuals who are unable to use an inaccessible existing facility.

Alterations to historic properties under the ADA

New alterations to historic properties must comply with the specific provisions governing historic properties in the 2010 ADA Standards, to the maximum extent feasible. Under those provisions, alterations should be done in full compliance with the alterations standards for other types of buildings. However, if following the usual standards would threaten or destroy the historic significance of a feature of the building, alternative solutions may be used. The decision to use alternative solutions for that feature must be made in consultation with the appropriate historic advisory board designated in the 2010 ADA Standards, and interested persons should be invited to participate in the decision-making process.

Note that any corrective actions needed to ensure program accessibility would also have to comply with the requirements of the 2010 ADA Standards for historic facilities.

State Obligation:

The state of CT has adopted the International Building Code (IBC) 2003, Chapter 11 which references ICC/ANSI A117.1 – 2003 as amended by the State Building Code.

In existing facilities and structures the provisions of Chapter 34 of the 2003 IBC and 2003 Section 506.2 of the 2003 International Existing Building Code (IEBC) applies.

II. Executive Summary of the Evaluation of Policies in Programs, Services and Activities

Title II of the Americans with Disabilities Act (ADA) prohibits discrimination against qualified individuals with disabilities by public entities. Activities covered include all services, programs and activities offered by the public entity, all aspects of employment, services carried out by contractors, all activities of the local legislative and judicial branches and public transportation.

A thorough understanding of the requirements of Title II of the ADA is an essential responsibility of public entities.

The ADA administrative requirements help ensure that the needs of people with disabilities are addressed in all services, programs and activities that the City operates. A Title II entity is required to:

1. Designate a Responsible Employee (ADA Title II - 28 CFR Part 35.107 (a)) to coordinate compliance with the ADA. The purpose of having a responsible employee – ADA Coordinator - is to ensure that when the public deals with a state or local government agency the public is able to identify a person who is knowledgeable with the requirements of the ADA.
 - The City of Stamford has met its obligation to designate a responsible employee by appointing Ellen Bromley from the Social Services Department as the City's ADA Coordinator.
2. Adopt and distribute a public Notice (ADA Title II - 28 CFR Part 35.106) of the provisions of the ADA to members of the public who may participate in the City's programs, services and activities. The effective notice should state the City's obligations under the ADA and include the complete contact information of the ADA Coordinator.

The City has an ADA Notice posted on employee bulletin boards but employees do not appear to be aware of those notices. Furthermore, from the responses, it appears that some departments are not aware of their ADA Notice obligations.

Publishing the Notice in all the materials distributed by the City; post the Notice on the City's website home page (Stamford Access for All web-page). Also, post copies in public locations in the City's buildings.

3. Develop and distribute Grievance Procedures (ADA Title II - 28 CFR Part 35.107 (b)) for prompt resolution of any complaint regarding disability discrimination.

From the responses submitted by staff, some departments refer to the City's grievance procedure, others responded that they "*have no ADA grievance procedures.*" It is not clear if staff is aware of their ADA obligation and the process for meeting the requirement for grievance procedures.

IHCD recommends the City take steps to clarify its grievance process for both employees and members of the public and post that information in print and on the City's website.

4. Modify its Policies, Practices and Procedures (ADA Title II – 28 CFR Part 35.130(b)(7)) when necessary to avoid discrimination.

From the responses submitted by the staff, it is not clear whether the City has developed policies regarding reasonable modification of policies, practices and procedures. Some departments did not know or were not aware of their obligations. There have been some instances when modifications of policies were denied due to participants' medical issues.

IHCD recommends that the City adopt policies, practices and procedures for responding to request for accommodations by members of the public with disabilities

5. Provide Reasonable Accommodation (ADA Title II – 28 CFR Part 35.140(a)) to qualified employees with disabilities. This requirement may include modifying work schedules, job restructuring, and making facilities used by employees readily accessible to an employee with a disability.

From the responses from the ADA questionnaire, there is no evidence that the City has failed to provide reasonable accommodation to its employees. Most departments refer to the City's policies.

IHCD recommends including appropriate inserts in materials and publications that contain general information disseminated to City's staff. We would also suggest that it be clearly included in the Personnel Policies and integrate the notice into hiring postings and procedures.

-
6. Provide Auxiliary aids and services (ADA Title II – 28 CFR Part 35.160) to ensure effective communication with people with disabilities. This provision requires ADA Title II entities to take steps to ensure that communication with members of the public and employees with disabilities is as effective as communication with others. This requirement may include but is not limited to providing sign language interpreters, providing Computer-Assisted-Real-time-Translation (CART), written materials for persons who are Deaf or have difficulty hearing, Braille or large print information or information in digital format for people who are blind or have difficulty seeing.

The City has guidelines available to all departments in the Human Resources' share drive. However, most departments responded they "don't know" or "N/A." Other departments referred to the City's policies but not sure if staff know the procedures of providing effective communication.

The City of Stamford would benefit from a written policy on Effective Communication so that staff across all departments have an understanding of their responsibility and clarity about what to do. Stamford has requested a training with all departments and staff dealing directly with the public. That will be scheduled as soon as possible through IHCD's New England ADA Center.

IHCD recommends that the City provide notices to the public, regarding the process of requesting auxiliary aids and services such as sign language interpreters and CART and include any deadlines for requesting auxiliary aids and services. We also recommend the information be available in print format as well as be available in alternate formats. This would be very important to include in an accessibility section of the City's website.

Finally, ensure that the City's website and other web-based services are accessible to people with disabilities. It is the Department of Justice position that when services are provided on a website, those services too must be made accessible.

III. Executive Summary of the Evaluation of Facilities

The analysis of existing conditions that encompasses the body of this evaluation is based on observations and documentation completed by IHCD team during site visits in the winter and spring of 2016. This accessibility survey included the following facilities:

Municipal Buildings:

- M1 - Government Center
- M2 - Old Town Hall
- M3 - Stamford Historical Society
- M4- Animal Control Center
- M5 - Glenbrook Community Center
- M6 - Lathon Wilder Community Center
- M7 - Yerwood Community Center
- M8 - Bedford St. Parking Garage
- M9 - Bell St. Parking Garage
- M10- Summer Street Parking Structure
- M11 - Recycling Center
- M12 - Scale House
- M13 - Police Headquarters*

** This facility was not surveyed; instead, IHCD will conduct a plan review of the proposed plans.*

Fire Houses:

- F1 - Belltown Fire Station
- F2 - Central Fire Headquarters
- F3 - Fire Maintenance Building
- F4 - Glenbrook Fire Station
- F5 - Shippan Fire Station
- F6 - South End Fire Station
- F7 - Springdale Fire Station
- F8 - Roxbury Turn of River 2 Fire Station
- F9 - Turn of River Fire Station 1 Fire Station*
- F10 - West Side Fire Station
- F11 - Woodside Fire Station

*Only the station was surveyed not the trailer

Based on IHCD team's observation, it can be difficult to determine when a building or facility may have been renovated or altered. Therefore, IHCD's review of the City-owned facilities was

based on compliance with the 2010 ADA Standards if not compliant with the 1991 ADA Standards.

In addition to the above facilities, IHCD also surveyed the following outdoor areas:

Parks/Open Space:

- P1 - Barrett Park
- P2 - Chestnut Hill Park
- P3 - Courtland Ave. Park
- P4 - Cove Island Park
- P5 - Cummings Park
- P6 - Czescik Park
- P7 - Dorothy Heroy Park
- P8 - E.G. Brennan Golf Course
- P9 - Fort Stamford Park
- P10 - Hatch Field Park
- P11 - Hunt Building*
- P12 - Kosziusko Park
- P13 - Lione Park
- P14 - Mianus River Park
- P15 - Mill River Park
- P16 - Northrup Park
- P17 - Scalzi Park
- P18 - Scofield Park*
- P19 - Boccuzzi Park (Southfield Park)
- P20 - Springdale Park
- P21 - Sterling Farms Golf Course
- P22 - Terry Conner's Ice Rink
- P23 - West Beach Park
- P24 - Riverbank Park

* These facilities were not surveyed because the City no longer offers programs and/or those facilities are not currently opened.

The accessibility survey of the parks/open spaces included considering the following elements: gates, walking surfaces and slopes, benches, drinking fountains, tables, play areas, recreational areas, and maintenance of accessible features.

It is important to note that those elements in existing facilities that are subject to supplemental requirements of the 2010 ADA Standards (*i.e.*, elements for which there are neither technical nor scoping specifications in the 1991 Standards) such as (C) *Recreational boating facilities*; (D) *Exercise machines and equipment*; (E) *Fishing piers and platforms*; (H) *Play areas*; (J) *Swimming*

pools, wading pools, and spas; and (L) Miscellaneous - (1) Team or player seating and Accessible route in court sports facilities, need to be brought into compliance.²

Building Facilities Overview

The building facility set includes eight (8) municipal buildings, three (3) parking garages and eleven (11) fire houses. The accessibility survey of those facilities includes all the spaces where the City offers programs, services and activities.

It is important to remember that under Title II of the ADA the City of Stamford must make sure that *“No qualified individual with a disability shall, because a public entity's facilities are inaccessible to or unusable by individuals with disabilities, be excluded from participation in, or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity”* [28 CFR Part 35.149].

This means that all related programs, services, and activities of the City, “when viewed in its entirety, must be accessible to individuals with disabilities unless doing so results in a fundamental alteration in the nature of the program or in an undue financial and administrative burden. This requirement is known as program accessibility.” [28 CFR Part 35.150].

The City may comply with the requirements through such means as redesign or acquisition of equipment, reassignment of services to accessible buildings, delivery of services at alternate accessible sites, alteration of existing facilities and construction of new facilities, or any other methods that result in making the City’s services, programs, or activities readily accessible to and usable by individuals with disabilities. A public entity is not required to make structural changes in existing facilities where other methods are effective in achieving compliance with this section.

In choosing among available methods for meeting the requirements of this section, a public entity shall give priority to those methods that offer services, programs, and activities to qualified individuals with disabilities in the most integrated setting appropriate.

In order to comply with the program accessibility obligations the City should consider:

1. Relocation of its programs, services and activities within current facility

Often the simplest solution is for the City to use what it already has in place. IHCD strongly recommends the relocation of programs, services and activities to accessible locations

² As described in 28 CFR 35.150(b)(2)(i) Title II ADA Regulations

within the facility.

2. Relocation of its programs, services and activities to another facility

When not possible to relocate them within the current facility, program, services, and activities should be relocated to an accessible facility.

3. Renovation/alteration of its facilities to ensure access to programs, services and activities

The City may consider the renovation of its facilities to ensure that the programs, services and activities are offered in the most integrated seating possible.

Note: To assist in prioritizing accessibility improvements to ensure compliance with the ADA Title II, IHCD has included a detailed catalog that supplements this ADA Self-Evaluation report. This catalog provides element-by-element, illustrated with photos, of compliance issues at each assessed facility. IHCD has been sending these catalogs in draft form to the City for review and feedback.

IHCD assessed compliance for all building facilities on the basis of the ADA and/or state code. In each of the building facilities set there is an overview that identifies the most substantial accessibility issues and several recommendations to increase accessibility of programs, services, and activities provided by the City.

In addition, an overview of order of magnitude cost has been included at the end of this section. When the City presents findings and recommendations to the community and receives feedback, some recommendations may need adjustment. All capital corrective actions will need to be prioritized into a planning and budgeting document likely organized over a seven to ten year period that is called the ADA Transition Plan. Together, the ADA Self-Evaluation and ADA Transition Plan will enable the City to make substantial progress in meeting its ADA responsibilities. The recommendations for corrective action on policies and procedures of the ADA Self-Evaluation are not included in the ADA Transition Plan since that is limited to capital issues. But they are a blueprint for meeting compliance responsibilities other than capital.

To determine which buildings must be made accessible, the City should consider:

- How to provide the program in the most integrated setting appropriate;
- The locations where the activities are offered;
- Which facilities are accessible and to what extent.

Key Recommendations for the building Facilities

- Ensure there is an accessible route from arrival points to those areas in the building where the programs, services and activities are provided.
- Ensure that accessible toilet rooms are provided in the building. Where it is technically infeasible to provide multi-user toilet rooms provide a single-user toilet room in the same area as the existing multi-user toilet rooms.
- Ensure that sufficient number of accessible parking spaces is provided.
- Ensure that where the programs, services or activities are offered there is sufficient number of accessibility features (accessible counters, accessible work surfaces, etc.)

M1 - Government Center

Major accessibility issues at Government Center include the lack of Assistive Listening Systems; this is a high priority since the City holds public meetings in the building. Of concern also is the lack of wheelchair accessible compartments in the multi-user men's and women's toilet rooms and lack of an accessible route to the Vault Records room. There are a mix of non-compliant parking issues including the absence of a van accessible parking space and the lack of compliant accessible aisles overall. There are also no accessible parking spaces located on the third floor near the Senior Center. The incorrect placement and/or lack of compliant accessible signage is also of great concern, especially at the emergency egresses.

Additional accessibility issues include lack of accessible service counters, height of wheelchair drinking fountains, and door hardware that requires grasping, pinching or twisting of the wrist at the toilet rooms located on the ground floor.

IHCD recommends the following improvements at the Government Center:

- Install Assistive Listening Systems for three of the meeting rooms.
- Install a Limited-Use / Limited-Application (LULA) elevator to provide access to the Vault room.
- Renovate toilet rooms to address accessibility issues.
- Ensure accessible parking spaces and access aisles are adequately sized and striped.
- Install compliant designation signage and ensure they are at the required location.
- Provide accessible counters.
- Provide accessible work surfaces (with 27" min. knee clearance).
- Provide ADA drinking fountains (with 27" min. knee clearance).
- Provide an automatic door opener (to provide access from the parking garage).

M2 - Old Town Hall

The major accessibility issue at the Old Town Hall is the lack of an independently operable lift at the main entrance - the lift requires a key to be operated, but the location of the lift key was unknown to the staff at the Old Town Hall.

Other concerns include minor accessibility issues at the toilet rooms, lack of compliant signage and door hardware that requires tight grasping, pinching, or twisting of the wrist

IHCD recommends the following improvements at Old Town Hall:

- Install a new exterior stairwell lift
- Provide hardware that does not require tight grasping, pinching or twisting of the wrist.
- Provide ADA drinking fountains for standing persons.
- Install compliant designation signage.
- Provide accessible counters.
- Provide accessible accessories at toilets.

M3 - Stamford Historical Society

The major accessibility issue at the Historical Society building is the lack of a vertical accessible route; as the only vertical travel in the building is via a set of stairs, visitors with mobility disabilities do not have access to the thrift shop located in the basement and the Society's permanent collection located on the second floor. Also of concern is the excessive running slope at the ramp from the entrance to the first floor, and the lack of assistive listening devices. Other accessibility issues include the lack of a fully accessible parking space, including a van accessible space and access aisle; the general parking lot has areas with significant deteriorated pavement and incorrect placement and/or lack of compliant accessible signage.

IHCD recommends the following improvements at the Historical Society:

- Install a lift to provide an accessible route from the main entrance to the first floor.
- Relocate the programs located on the second floor to the first floor as needed.
- Make repairs to the exterior ramp.
- Provide hardware that does not require tight grasping, pinching or twisting of the wrist.
- Install Assistive Listening System.
- Provide one accessible parking space.
- Install compliant designation signage.

M4– Animal Control Center

The major accessibility issue at the Animal Control Center includes lack of accessible toilet rooms. Other accessibility issues include lack of accessible parking, including a van accessible space as well as an access aisle, and lack of directional signs.

IHCD recommends the following improvements at the Animal Control Center:

- Renovate toilet rooms.
- Provide accessible routes to all elements in the Animal Control Center.
- Install compliant designation signage.
- Provide a van accessible space and an access aisle.
- Provide accessible picnic tables (with 27" min. knee clearance).

M5 - Glenbrook Community Center

The major accessibility issues at the Glenbrook Community Center are the lack of accessible multi-user men's and women's toilet rooms, lack of fully accessible toilet rooms in classrooms 1 and 2, and the lack of accessible boy's and girl's multi-user toilet rooms. Also of concern is the excessive slope of the ramp leading to the main entrance and lack of accessible route in the play area and around play components.

Other accessibility issues include the lack of accessible drinking fountains and the width and lack of maneuvering clearance of some doors. Also of concern is the lack of a fully accessible parking space, including a van accessible space and an access aisle.

IHCD recommends the following improvements at the Glenbrook Community Center:

- Provide an ADA complaint ramp.
- Renovate toilet rooms in classroom 1 and 2 and boy's and girl's multi-user toilet rooms.
- Provide accessible route in playground and around play components.
- Provide ADA accessible drinking fountains.
- Provide automatic door openers.

M6 - Lathon Wilder Community Center

The major accessibility issues at the Community Center are the lack of accessible toilet rooms at the Health Clinic, the lack of an accessible route to the gym and the Health Center. Also of concern is the lack of an accessible route to one of the playgrounds.

Other accessibility concerns include minor issues at the accessible multi-user restrooms on both floors, lack of accessible drinking fountains for standing persons and the lack of signage at the accessible parking space.

IHCD recommends the following improvements at the Lathon Wilder Community Center:

- Provide accessible routes including ramps on 1st and 2nd floors and accessible route inside the playground and around play areas
- Provide accessible toilet rooms.
- Install compliant designation signage.
- Provide automatic door openers.

- Provide accessible counters.

M7 - Yerwood Community Center

The major accessibility issues at the Yerwood Community Center are lack of accessible multi-user toilet rooms inside the pool and the reception area and accessible single user toilet rooms in the game room. Also of concern is the lack of an accessible route to the play components in the play area for one of the playgrounds.

Other accessibility issues include lack of compliant signage at egress stairwells.

IHCD recommends the following improvements at the Yerwood Community Center:

- Provide accessible single and multi-users toilet rooms.
- Provide men's and women's locker rooms.
- Provide accessible routes including around the Community Center and to the playground.
- Install compliant designation signage.
- Provide a drinking fountain for standing persons.

M8 - Bedford Street Parking Garage

The major accessibility issue at the Parking Garage is the lack of an accessible route to the elevators and pay stations on any level of the garage including the first level where the accessible parking spaces are located. Also of concern is the lack of compliant number of accessible spaces included van accessible spaces and access aisles.

IHCD recommends the following improvements at the Bedford Parking Garage:

- Provide accessible parking spaces (2nd and 3rd levels).
- Provide an ADA compliant ramp.
- Provide ADA compliant curb ramps to provide accessible routes to elevator and pay station.
- Install compliant designation signs at parking spaces.

M9 - Bell Street Parking Garage

The major accessibility issue at the Parking Garage is the lack of an accessible route to the elevator and the pay station at each parking level. Also of concern is the lack of compliant number of accessible spaces including van accessible spaces and access aisles.

IHCD recommends the following improvements at the Bell Street Parking Garage:

- Provide accessible parking spaces (located near elevators on 2nd, 3rd and 4th floors).
- Provide ADA compliant curb ramps to provide accessible routes to elevator and pay station.
- Provide hardware that does not require tight grasping, pinching or twisting of the wrist.

M10 - Summer Street Parking Garage

The major accessibility issue at the Parking Garage is the lack of compliant accessible routes around the Parking Garage and in the Garage. Other accessibility issues include lack of compliant accessible spaces and access aisles and the signs location at the accessible spaces

IHCD recommends the following improvements at the Summer Street Parking Garage:

- Provide accessible routes (around the Parking Garage).
- Provide accessible routes (in the Parking Garage).
- Ensure slopes at parking spaces and access aisles are maintained.
- Install compliant designation sign at the van accessible spaces.

M11 - Recycling Center

Accessibility issues at the Recycling Center include the lack of accessible routes to the recycling and book exchange areas, lack of an accessible parking space, including a van accessible space with an access aisle.

IHCD recommends the following improvements at the Recycling Center:

- Provide an accessible route to all elements in the Recycling Center.
- Provide a van accessible space and an access aisle.

M12 - Scale House

Accessibility issues include the lack of an accessible route to the reception area.

IHCD recommends the following improvements at the Scale House:

- Provide an accessible route to the reception area.

M13- Police Headquarters

The survey of this building was replaced for a review of the architectural drawing plans. Those will be shared with IHCD for plan review at the time that they are available. IHCD is committed to that element of the scope past completion of the rest of the project without additional fees.

Fire House Facilities

F1 - Belltown Fire Station

The major accessibility issue is an eight-inch step at the front door to the main entrance leading to the reception area.

Other accessibility issues include inadequate maneuvering clearance at doors in the kitchen and restrooms, the lack of an accessible sink and work surface in the kitchen, door hardware that

cannot be operated with a closed fist, signs without braille or raised characters, and the lack of a fully accessible parking space, including a van accessible space and access aisle.

IHCD recommends the following improvements at the Belltown Fire Station:

- Provide accessible routes.
- Provide accessible work surface (with 27" min. knee clearance)
- Provide accessible features at toilet rooms.
- Install compliant designation signage.

F2 - Central Fire Headquarters

The major accessibility issue at Central Fire Headquarters is the lack of an accessible entrance, and the lack of an accessible restroom at the main entrance and on the third floor. Also of concern is the lack of accessible showers. Other accessibility issues include the lack of assistive listening systems in the third floor classroom and the lack of a fully accessible parking space, including a van accessible space and access aisle.

IHCD recommends the following improvements at the Central Fire Headquarters:

- Install an ADA Ramp at the main entrance.
- Provide accessible toilet rooms.
- Provide a single user toilet rooms (1st and 2nd floors).
- Alteration to elevator.
- Provide accessible parking spaces.
- Provide Assistive Listening System.

F3 - Fire Maintenance Building

The major accessibility issues at the Fire Maintenance Building include the lack of an accessible entrance and the lack of an accessible toilet room. Also of concern are the lack of signage to the main entrance, and the lack of a clear 36 inch accessible route to the toilet room due to protruding objects and equipment. Other accessibility issues are the lack of a fully accessible parking space, including a van accessible space with an access aisle.

IHCD recommends the following improvements at the Fire Maintenance Building:

- Renovate toilet room.
- Provide an accessible parking space.

F4 - Glenbrook Fire Station

There are no major accessibility issues at the Glenbrook Fire Station. Minor concerns are the lack of a few accessible features at the accessible single-user toilet room, and the lack of an

accessible drinking fountain for standing persons. Also of concern is the lack of a fully accessible parking space, including a van accessible space and access aisle.

IHCD recommends the following improvements at the Glenbrook Fire Station:

- Install compliant designation signage.
- Provide a folding vertical grab bar.
- Provide a drinking fountain for standing persons.
- Provide accessible parking.

F5 - Shippan Fire Station

The major accessibility issue at the Shippan Fire Station is the lack of a wheelchair accessible compartment in the toilet room.

Other accessibility issues include the failure to maintain a clear accessible route through the building. Also of concern are the lack of an accessible route from the parking area, and the lack of a van accessible parking space and access aisle.

IHCD recommends the following improvements at the Shippan Fire Station:

- Renovate toilet room to address accessibility issues.
- Provide hardware that does not require tight grasping, pinching or twisting of the wrist.
- Provide one accessible parking space.

F6 - South End Fire Station

The major accessibility issue at South End Fire Station is the lack of a fully accessible parking space, including a van accessible space and access aisle.

IHCD recommends the following improvements at the South End Fire Station:

- Provide accessible counters.
- Renovate toilet rooms to address minor accessibility issues.
- Ensure accessible parking spaces and access aisles are adequately sized and striped.

F7 - Springdale Fire Station

The major accessibility issue at Springdale Fire Station is the lack of an accessible entrance due to the presence of a 6" step. Other accessibility issues include an inaccessible phone at the main entrance, and the lack of a fully accessible parking space, including a van accessible space and access aisle.

IHCD recommends the following improvements at the Springdale Fire Station

- Regrade entrance route to ensure is not steeper than 1:48 max. in all directions.
- Provide one van accessible parking space.

F8 - Roxbury Turn of River 2

The major accessibility issues at Turn of River Fire Station 2 are the lack of an accessible route from the parking area to an accessible entrance, and the lack of an accessible toilet room.

Other accessibility issues include the lack of a fully accessible parking space, including a van accessible space and access aisle.

IHCD recommends the following improvements at Turn of River Fire Station 2:

- Accessible route to entrance.
- Alteration to toilet rooms.
- Automatic door opener.
- Install compliant designation signage.

F9 - Turn of River Fire Station 1*

The major accessibility issue at Turn of River Fire Station 1 is the lack of a vertical accessible route, as the only vertical travel in the building is via two sets of stairs. As a result, visitors with mobility disabilities do not have access to the meeting room or kitchen, or to the only women's toilet room in the Station. Also of concern is the lack of assistive listening devices for use in the meeting room, and the absence of a fully accessible parking space, including a van accessible space and access aisle.

*Only the station was surveyed, not the trailer

IHCD recommends the following improvements at the Turn of River Fire Station 1:

- Install a Limited-Use / Limited-Application (LULA) elevator.
- Install Assistive Listening Systems
- Provide an accessible parking space and access aisle.
- Provide hardware that does not require tight grasping, pinching or twisting of the wrist.
- Provide ADA accessible drinking fountains.

F10 - West Side Fire Station

The major accessibility issue is the lack of an accessible route to the main entrance from the parking lot due to excessive slopes in the sidewalk. Other accessibility issues include the lack of a fully accessible parking space, including a van accessible space and access aisle. The absence

of an accessible counter in the reception area is also of concern and there are some issues with the accessible restroom.

IHCD recommends the following improvements at the West Side Fire Station:

- Curb ramps at three locations
- Provide accessible features at toilet rooms.
- Provide accessible counters.

F11 - Woodside Fire Station

The major accessibility issues at Woodside Fire Station include the lack of an accessible route leading to the main entrance which has a 6”-high step, and the lack of an accessible toilet room. A high service counter in the lobby, and the absence of a van-accessible parking space and access aisle are also of concern..

IHCD recommends the following improvements at the Woodside Fire Station:

- Provide a single-user accessible toilet room.
- Grade entrance to 5% max.
- Provide accessible service counter.
- One accessible parking space.

Outdoor Facilities Overview

The outdoor facility set includes 24 parks/open spaces facilities. The accessibility survey of those spaces encompassed elements such as gates, walking surfaces and slopes, benches, drinking fountains, tables, play areas, recreational areas, and maintenance of accessible features. IHCD assessed compliance for all parks/open spaces on the basis of the Title II of the ADA. In each of the parks in the outdoor facilities set there is an overview that identifies the most substantial accessibility issues and a compilation of order of magnitude costs generated from the total of all issues.

The program accessibility obligation does not typically require that every outdoor area be made accessible. Usually, a public entity determines which method it will use for meeting its program accessibility obligations. When structural changes are made to existing facilities, the changes must comply with the 2010 ADA Standards for Accessible Design. When choosing to purchase equipment or to make structural changes, the public entity should factor financial resources required to maintain program accessibility.

Over time, the City will need to reassess its compliance with program accessibility, and it may become necessary to acquire new accessible equipment or make structural modifications

To determine which outdoor areas must be made accessible, the City should consider:

- How to provide the program in the most integrated setting appropriate;
- Locations where the activities are offered;
- Which outdoor areas are accessible and to what extent;
- Level of dispersion of the accessible outdoor areas and convenience to reach them (playgrounds, baseball fields, soccer fields, etc., accessible by public transportation or pedestrian routes).

Key Recommendations for the Outdoor Facilities

- Ensure there is an accessible route to all elements in the park (picnic area, playgrounds, baseball field, basketball court, toilet facilities, etc.).
- Ensure that accessible routes are provided to playground; in addition, ensure that an accessible route is provided in the play area to all accessible play components.
- Provide beach access mats to ensure an accessible route to the beach.
- When toilet room facilities are provided, ensure that accessible toilet room are also provided at the facility.
- Ensure that accessible wheelchair spaces at bleachers are provided.
- Install compliant designation signage.
- Ensure that a certain number of amenities in the parks are accessible (e.g. picnic tables).

P1 - Barrett Park

The major accessibility issue at Barrett Park is the lack of accessible routes to the toilet rooms and the other amenities including the basketball court, picnic pavilion and the bleachers and players seating at the baseball field.

Other accessibility issues include the lack of a van-accessible parking space and lack of signage at the toilet rooms.

IHCD recommends the following improvements at Barrett Park:

- Provide an accessible route in the play area to areas under and around play components - three playgrounds.
- Provide accessible routes to all elements in the park (playgrounds, baseball field, basketball court).
- Alteration to toilet rooms.

- Provide accessible picnic tables (with 27” min. knee clearance).

P2 - Chestnut Hill Park

The major accessibility issue at Chestnut Hill Park is the lack of accessible routes to amenities including picnic tables and bleachers at the baseball field. Also of concern is the lack of accessible routes within the play area to the different play components. Other accessibility issues include the lack of accessible parking spaces, lack of compliant signage at the toilet rooms and lack of maneuvering space at the accessible urinal in the men’s toilet room.

IHCD recommends the following improvements at Chestnut Hill Park:

- Provide accessible routes to all elements in the park (baseball field, batting cages, two picnic areas, playgrounds & gazebo).
- Provide an accessible route to playground (in the play area to areas under and around play components).
- Renovation to multi-user toilet rooms and changing rooms.
- Provide clear floor space at bleachers.

P3 - Courtland Ave. Park

The major accessibility issue at Courtland Ave. Park is the lack of accessible routes to the toilet rooms and the other amenities including the dog park, the picnic area and the playground areas. Other accessibility issues include the lack of accessible parking spaces and lack of signage at the toilet rooms.

IHCD recommends the following improvements at Courtland Ave. Park:

- Ensure accessible parking spaces are provided.
- Ensure there is an accessible route to all elements in the park (picnic area, playgrounds, toilet facilities and Dog Park).
- Ensure that accessible routes are provided to playground; in addition, ensure that an accessible route is provided in the play area to all accessible play components.
- Install compliant designation signage.

P4 - Cove Island Park

The major accessibility issues at Cove Island Park are the lack of wheelchair accessible toilet compartments, accessible shower compartments and accessible changing compartments at one of the two toilets/changing rooms.

Common accessibility issues include lack of accessible tables at picnic areas, lack of accessible routes to amenities such as volleyball, tennis and basketball court. Other accessibility issues

include lack of compliant signage at the accessible parking spaces and at the multi-user toilet rooms and lack of accessible aisles at some of the designated accessible parking spaces.

IHCD recommends the following improvements at Cove Island Park:

- Ensure accessible routes to all elements in the park are provided.
- Renovate multi-user toilet rooms to address accessibility issues.
- Ensure that an accessible route to the playground is provided; in addition, ensure that an accessible route is provided in the play area to all accessible play components.
- Provide beach access mats to ensure an accessible route to the beach.
- Install compliant designation and directional signage.

P5 - Cummings Park

The major accessibility issue at Cummings Park is the lack of an accessible route to the toilet/shower and changing rooms located on the second floor; since there is not a vertical accessible route, people with mobility disabilities do not have access to the shower and changing areas. Also of concern is the lack of fully accessible wheelchair toilet rooms on the first floor. Other accessibility issues include the absence of any accessible tables at picnic areas and lack of accessible routes to amenities such as tennis, basketball court and playground.

IHCD recommends the following improvements at Cummings Park:

- Provide accessible changing rooms and accessible showers on the first floor.
- Renovate multi-user toilet rooms to address accessibility issues.
- Provide an accessible route to the playground; in addition, ensure that an accessible route is provided in the play area to all accessible play components.
- Ensure accessible routes to all elements in the park are provided.
- Install compliant designation signage.
- Provide beach access mats to ensure an accessible route to the beach.
- Make reparations to the stairway to address the open stair risers and handrails.

P6 - Czescik Park

The major accessibility issue at Czescik Park is the lack of accessible wheelchair compartments in the multi-user toilet rooms as well as the lack of compliant width at the doors to the toilet rooms. Also of concern are the lack compliant accessible routes to all elements in the Park, lack of companion seating space at benches and lack of compliant sign at the van accessible space.

IHCD recommends the following improvements at Czescik Park:

- Alteration to multi-user toilet rooms.
- Install compliant designation signage.

P7 - Dorothy Heroy Park

The major accessibility issues at Dorothy Heroy Park include the lack of accessible routes to the pool, tennis court, basketball court, picnic areas, playground, baseball field, and the lack of an accessible route in the playground to accessible play components. There is also no accessible vertical access to the large second-floor activity room, where two inaccessible restrooms are located. Other accessibility issues include the lack of van accessible parking spaces in both parking lots, signage at multiple restrooms, and high thresholds at the entrances to both of the restrooms that have a wheelchair accessible stall.

IHCD recommends the following improvements at Dorothy Heroy Park:

- Provide a Limited-Used / Limited-Application Elevator.
- Provide accessible route to all elements in the park (pool, tennis court, basketball court, picnic areas, playground, and baseball field).
- Provide accessible route to all elements in the playground (in the play area to areas under and around play components).
- Widen door (32" min. clear width).

P8 - E.G. Brennan Golf Course

Major accessibility issues at the E.G. Brennan Golf include the lack of women's and men's accessible toilet rooms, men's accessible locker rooms and accessible showers. Of concern also, is the lack of an accessible route to the meeting room, toilet rooms and the lack of golf car accessible route to tee #1.

IHCD recommends the following improvements at the E.G. Brennan Golf:

- Renovation to toilet rooms and locker rooms.
- Alteration to two accessible parking spaces.
- Two wheelchair accessible drinking fountains.
- Provide accessible routes to all elements in the Golf course.
- Provide an accessible golf car route.

P9 - Fort Stamford Park

Accessibility issues at the Fort include lack of accessible parking spaces, lack of accessible routes throughout the Fort. Other accessibility issues include lack of compliant ramp leading to the second floor and lack of directional signs.

IHCD recommends the following improvements at the Fort:

- Provide accessible routes to all elements in the Fort.

- Provide van-accessible parking spaces.

P10 - Hatch Field Park

Accessibility issues at the Park include the condition of two of the three curb ramps, and the location and type of picnic tables, which are not accessible.

IHCD recommends the following improvements at Hatch Field Park:

- Provide accessible picnic tables (with 27" min. knee clearance).
- Alteration to curb ramps.

P11 - Hunt Building

This facility was not surveyed because the City no longer offer programs and the building has been closed.

P12 - Kosziusko Park

The major accessibility issue is the lack of wheelchair compartments at the multi-user toilet rooms and of accessible routes to the toilet rooms. Also of concern is the lack of accessible routes to play areas and around play components. Other accessibility issues include the lack of wheelchair accessible spaces and the bleachers, lack of van accessible parking spaces and signage not located on the latch side of the door at the toilet rooms.

IHCD recommends the following improvements at Kosciuszko Park:

- Alteration to toilet rooms.
- Alteration to accessible parking spaces.
- Accessible route in the play area to accessible play components.
- Clear floor space at bleachers
- Provide accessible picnic tables (with 27" min. knee clearance).
- Provide ADA accessible drinking fountains.

P13 – Michael Lione Park

The major accessibility issue at Lione Park is the lack of accessible routes to some park amenities including the playgrounds, tennis court and basketball court. Other accessibility issues include the lack of compliant signage at the toilet rooms, wheelchair space at bleachers and accessible picnic tables.

IHCD recommends the following improvements at Lione Park:

- Ensure accessible routes to all elements in the park are provided.

- Ensure that accessible routes to playground are provided; in addition, ensure that an accessible route is provided in the play area to all accessible play components.
- Install compliant designation signage.

P14 - Mianus River Park

The major accessibility issue is the excessive slope of trails throughout the Park and severely uneven terrain. Other accessibility issues include the lack of accessible parking spaces and the lack of accessible routes to informational maps at the Park.

IHCD recommends the following improvements at Mianus River Park:

- Provide information on the maps and on the website about the excessive slope of trails at this Park.
- Provide van accessible parking spaces.
- Accessible routes to maps.

P15 - Mill River Park

There are no major accessibility issues since the Park was recently opened to the public. Among areas of concern is the lack of an accessible route to the playground entrance; other accessibility issues include the lack of an accessible route to the “Tot” play area and the lack of fully complaint ramps – either a one-inch change in level or great drop to the playground surfaces.

IHCD recommends the following improvements at Mill River Park:

- Provide accessible routes to all elements in the park.
- Provide an accessible route (in the play area to areas under and around play components) .
- Provide ADA accessible drinking fountains.

P16 - Northrup Park

Accessibility issues include lack of an accessible route to the playground area – play components and play tables - the dugout areas at the baseball field. Other accessibility issues include the lack of a wheelchair space at the bleachers. Of concern also is the lack of a compliant entrance near the baseball field.

IHCD recommends the following improvements at Northrup Park:

- Ensure accessible routes to all elements in the park are provided.
- Ensure that accessible routes to playground are provided; in addition, ensure that an accessible route is provided in the play area to all accessible play components.
- Ensure that accessible wheelchair spaces at bleachers and team seating area are provided.

P17 - Scalzi Park

Due to recent renovations, Scalzi Park does not have major accessibility issues. Of concern is the lack of a wheelchair accessible toilet compartment at the multi-user toilet rooms closest to the playground. Also of concern is the lack of an accessible route to the dugout at the Cuberta baseball field and lack of compliant accessible viewing spaces.

Common accessibility issues include lack of a wheelchair clear floor spaces at bleachers, lack of accessible routes to amenities such as benches, drinking fountains, or dog waste bag dispensers. Other accessibility issues include lack of compliant signage at the accessible parking spaces and at the multi-user toilet rooms.

IHCD recommends the following improvements at Scalzi Park:

- Ensure accessible routes to all elements in the park are provided.
- Renovate multi-user toilet rooms to address accessibility issues.
- Provide ADA accessible drinking fountains.
- Ensure accessible parking spaces and access aisles are adequately sized and striped.
- Install compliant designation signage.
- Ensure that accessible wheelchair spaces at bleachers are provided.
- Provide accessible picnic tables (with 27" min. knee clearance).

P18 - Scofield Park

This facility was not surveyed because the City no longer offers programs at this location.

P19 - Boccuzzi Park (Southfield Park)

Southfield Park is relatively accessible, common issues include the lack of accessible routes to amenities such as softball, basketball and tennis courts and lack of fully wheelchair accessible toilet compartments.

Other accessibility issues include, lack of accessible tables at picnic areas, compliant signage at the accessible at the multi-user toilet rooms.

IHCD recommends the following improvements at

- Provide accessible routes to all elements in the park.
- Provide parking spaces.
- Provide beach access mats.
- Provide wheelchair space at bleachers.
- Provide accessible picnic tables (with 27" min. knee clearance).

P20 - Springdale Park

The major accessibility issue at Springdale Park is the lack of accessible routes to the Park's amenities including the baseball field, dugouts, bleachers, picnic areas, and playgrounds. Other accessibility issues include the lack of accessible parking spaces including a van accessible space, the lack of companion seating at the bleachers and dugouts, accessible drinking fountains and the lack of compliant signage at the toilet rooms.

IHCD recommends the following improvements at Springdale Park:

- Provide accessible routes (in play area to areas under and around play components and to all elements in the park).
- Provide a compliant ramp.
- Provide ADA accessible drinking fountains.
- Provide accessible parking spaces.
- Provide accessible picnic tables (with 27" min. knee clearance).
- Install compliant designation signage.

P21 - Sterling Farms Golf Course

The major accessibility issues at the Sterling Golf Course are the lack of compliant accessible toilet rooms around the Golf course, lack of accessible routes to all the elements in the Golf course and to the play components in the playground.

Other accessibility concerns include the lack of compliant signage, lack of accessible picnic tables and accessible drinking fountains.

IHCD recommends the following improvements at Sterling Golf Course:

- Renovate toilet rooms on the Golf course to address accessibility issues.
- Renovate toilet rooms in Zody's Banquet Hall (combine two single user toilet rooms)
- Renovate toilet rooms in the Dressing Room Theater (single user toilet room in dressing room).
- Provide accessible routes to all elements in the golf course.
- Provide ADA accessible drinking fountains.
- Accessible route in the play area to areas under and around play components.
- Provide ADA accessible counters.
- Provide wheelchair spaces and companion seats at the Kveskin Theater.
- Install compliant designation signage at accessible parking spaces and at inaccessible toilet rooms.
- Provide wheelchair clear floor space at benches.
- Provide accessible picnic tables (with 27" min. knee clearance).

P22 - Terry Conner's Ice Rink

The major accessibility issues at the Rink include the lack of an accessible route into the Rink from the team seating area, the lack of a wheelchair compartment at the men's multi-user toilet room, a lack of accessible showers at the locker rooms, a lack of an accessible shower and toilet in the official's locker room. Other concerns also are the lack of compliant accessible seating at the wheelchair viewing area, and the excessive slope of the ramp leading to that area.

Other accessibility issues include lack of once accessible aisle and lack of compliant signage at the accessible parking spaces, the locker rooms and the toilet rooms. Also of concern is the lack of maneuvering clearances at the entrances to the locker rooms including the official's locker room and the women's toilet room.

IHCD recommends the following improvements at Terry Conner's Ice Rink:

- Provide an accessible route to the Rink from the team seating area.
- Renovate multi-user toilet rooms to address accessibility issues.
- Renovate locker rooms.
- Install compliant designation signage.
- Provide ADA accessible drinking fountains.
- Provide ADA accessible counters.
- Ensure accessible access aisles at parking spaces are adequately sized and striped.

P23 - West Beach Park

The major accessibility issue at West Beach Park is the lack of accessible routes to bleachers and team play area at the baseball field, and accessible routes to play areas, the lack of compliant wheelchair accessible toilet compartment at the men's and women's multiuser toilet rooms. Also of concern is the lack of an accessible route to the beach.

Other accessibility issues include the lack of accessible parking spaces at the parking lot near the baseball and soccer fields and lack of compliant signage at the toilet rooms.

IHCD recommends the following improvements at West Beach Park:

- Renovate multi-user toilet rooms to address accessibility issues.
- Ensure accessible parking spaces and access aisles are adequately sized and striped.
- Ensure accessible routes to all elements in the park are provided.
- Ensure that accessible routes to playground are provided; in addition, ensure that an accessible route is provided in the play area to all accessible play components.
- Ensure that accessible wheelchair spaces at bleachers are provided.
- Provide beach access mats to ensure an accessible route to the beach.
- Install compliant designation signage.

P24 - Riverbank Park

The major accessibility issues at Riverbank Park are the ground obstructions including rocks, tree roots, fallen tree trunks, high grass, severely uneven terrain and excessive slopes at numerous points along the walking trails in the Park.

Other accessibility issues include the lack of accessible parking spaces, an uneven surface in the parking area and the lack of an accessible route into the trailhead.

IHCD recommends the following improvements at Riverbank Park:

- Provide an accessible route to the waterfall.
- Provide accessible parking spaces.
- Provide accessible picnic tables (with 27” min. knee clearance).
- Provide maps detailing the nature of the trails in the Park, and provide the same information online.