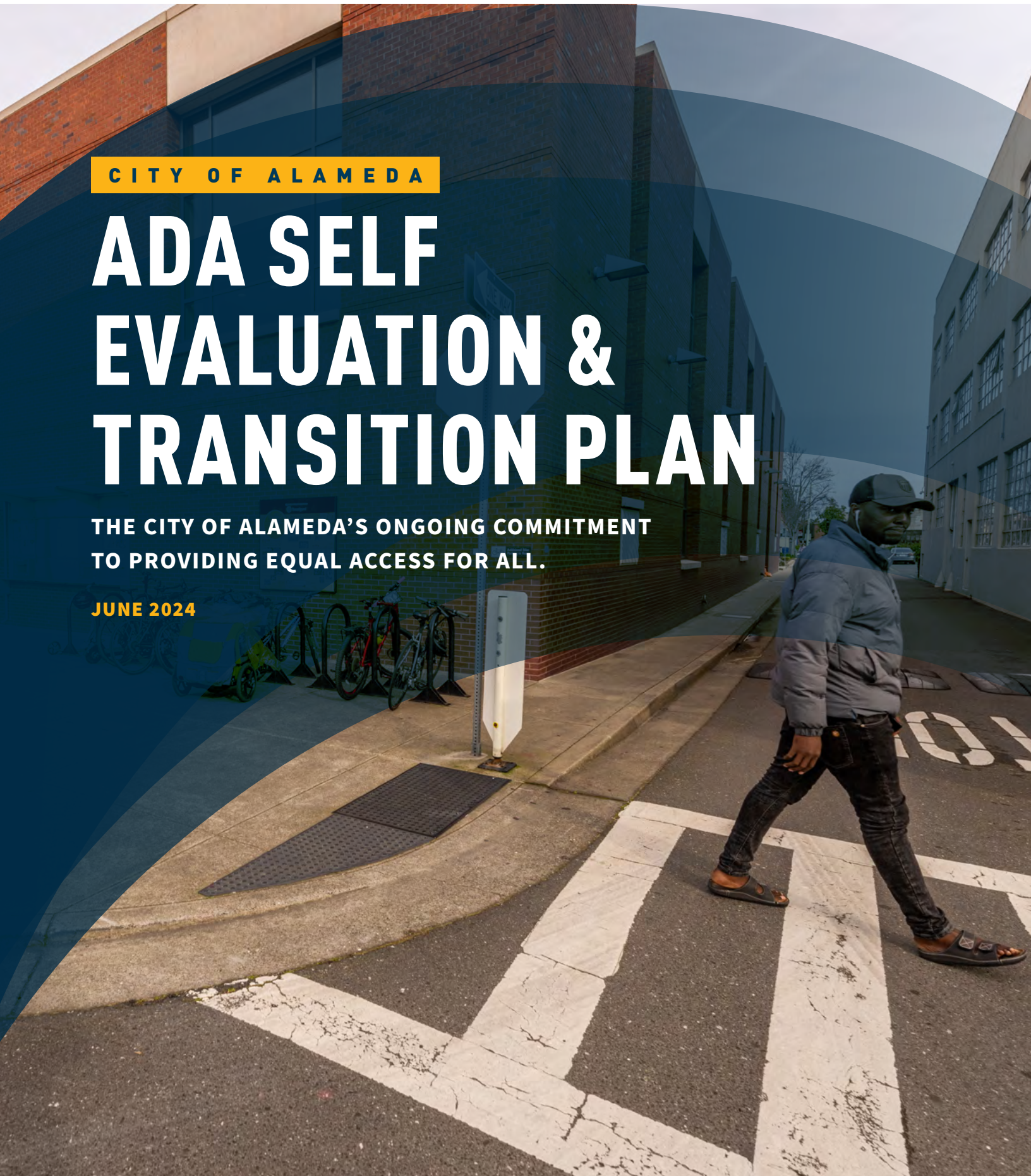


CITY OF ALAMEDA

ADA SELF EVALUATION & TRANSITION PLAN

THE CITY OF ALAMEDA'S ONGOING COMMITMENT
TO PROVIDING EQUAL ACCESS FOR ALL.

JUNE 2024



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EXECUTIVE SUMMARY

This Plan establishes the City of Alameda’s ongoing commitment to providing equal Access to all.

This Americans with Disabilities Act (ADA) Self Evaluation and Transition Plan establishes the City of Alameda’s (City) ongoing commitment to providing equal access for all.



The City recognizes that access is not just a civil right, it is a social responsibility to uphold. Inaccessible public services and facilities create barriers that limit full participation in civic life for individuals with disabilities. In developing this plan, the City collaborated with community members to identify programmatic and mobility barriers, as well as the steps needed to achieve full accessibility.

The Americans with Disabilities Act (ADA), enacted on July 26, 1990, is a comprehensive civil rights law for persons with disabilities in both employment and the provision of goods and services. The ADA states that its purpose is to provide a “clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities.” Congress emphasized that the ADA seeks to dispel stereotypes and assumptions about disabilities and to assure equality of opportunity, full participation, independent living, and economic self-sufficiency for people with disabilities.



This Self Evaluation and Transition Plan was prepared with the expert assistance of Bureau Veritas and in accordance with the requirements of Title II of the ADA requiring public entities to reasonably modify their policies, practices, or procedures to avoid discrimination against people with disabilities. It is intended to assist the City, its City Council, and staff in identifying policy, programmatic, and physical barriers to accessibility and in developing barrier removal solutions that will facilitate the opportunity of access to all individuals.



THE CITY RECOGNIZES THAT ACCESS IS NOT JUST A CIVIL RIGHT, IT IS A SOCIAL RESPONSIBILITY TO UPHOLD.



Aerial view of Whale Park

Public outreach and input were essential components of developing the ADA Self Evaluation and Transition Plan.

The community was provided information on the City’s responsibilities regarding the ADA and the results of the various assessments. The community shared where they experience barriers to accessibility and how they prefer to prioritize improvements to remove barriers. This input is reflected in the Transition Plan.

Included in this report is a description of the process by which policies, programs, and facilities were evaluated for compliance with the ADA; presentation of the findings of that

evaluation; documentation of public input and engagement in setting priorities; and a phased approach to addressing identified accessibility barriers. Title II of the ADA regulations state that if a transition plan will take more than one year to fully implement, it must contain interim steps to provide program accessibility. **The report is divided into five sections: public engagement and input; evaluation of City buildings and parks; assessment of pedestrian facilities in the public right of way; review City programs and services; and the Transition Plan.**



CITY BUILDINGS AND PARKS

58 City sites (City Halls, Libraries, Parks, Parking Lots, etc..) were evaluated for accessibility. Removal of identified barriers is prioritized into five phases with each phase coinciding with the City’s biennial budget as shown in the table below. The sites within each phase were determined by usage levels, amenity uniqueness, site safety, public input, and other considerations. The Transition Plan lists the sites, number of barriers and cost to remediate for each site within each phase. A primary goal of the phasing plan is to optimize the use of available funds to provide access to public amenities that matter the most to the public. It is likely that implementation of the phases will overlap as a phase may take longer than two years to implement. Barrier removal in this plan is focused on public areas as the City has a separate program to address workplace safety and access. Additionally, employee areas are addressed through a reasonable accommodation process, under Title I of the ADA.

Phase	Estimated Cost
Phase 1, FY23/24-24/25	\$2,445,504
Phase 2, FY25/26-26/27	\$2,134,292
Phase 3, FY27/28-28/29	\$912,619
Phase 4, FY29/30-30/31	\$1,159,553
Phase 5, FY31/32-32/33	\$910,121
TOTAL	\$7,562,089

 **CITY COUNCIL APPROVED PHASE 1 FUNDING IN THE FY23/24-24/25 BUDGET**



PEDESTRIAN FACILITIES IN THE PUBLIC RIGHT OF WAY

2,862 curb ramps, 89 signalized intersections, 220 miles of sidewalk and 22.6 miles of pathways were evaluated using the Public Right-of-Way Accessibility Guidelines (PROWAG) and California Building Code. Transit stops, crosswalks and other controlled pedestrian crossings (ex. Rectangular Rapid Flashing

Beacons) will be evaluated and added to the Transition Plan as part of a future update.

Improving accessibility along pedestrian travel ways in the public right of way will primarily take place through existing programs. The City’s Pavement Management, Sidewalk Repair and Traffic Signal Modernization

programs are funded annually in the City’s capital budget. The City will establish a new annual Curb Ramp Accessibility program to be launched in 2024/25 with funding from Community Development Block Grant (CDBG). The following framework will be used to prioritize barrier removal. Referenced street classifications are from the City’s General Plan.

The ADA requires that priority be given to walkways serving entities covered by the Act, including State and local government offices and facilities, transportation, places of public accommodation, and employers, followed by walkways serving other areas.

HIGHEST PRIORITY	NEXT HIGHEST PRIORITY	THIRD HIGHEST PRIORITY
<ul style="list-style-type: none"> Requests from persons with disabilities experiencing a barrier. Improve sidewalk accessibility on Main Streets, around City Sites and Parks and in Socially Vulnerable Neighborhoods by removing barriers and trip hazards. Missing curb ramps Citywide. Repair/replace Island and Mecartney Drive pathways. Missing pedestrian signal heads and Accessible Pedestrian Signals Citywide. 	<ul style="list-style-type: none"> Improve sidewalk accessibility on Local Streets by removing barriers and trip hazards. Patching/temporary repairs on pathways/trails to address tripping hazards. Curb ramps with a low accessibility score Citywide. 	<ul style="list-style-type: none"> Improve sidewalk accessibility on Neighborhood Connectors, Gateway, and Business Commercial Streets by removing barriers and trip hazards. Replacement/reconstruction of pathways/trails to address cross slopes and other barriers. Curb ramps with a medium accessibility score Citywide.

PROGRAMS AND SERVICES

The Self Evaluation identified several areas where the City can enhance accessibility in our communications, community-based programs and services, ADA grievance process, internal policies, and emergency management.



The Self Evaluation identified several areas where the City can enhance accessibility in our communications, community-based programs and services, ADA grievance process, internal policies, and emergency management. Specific recommendations are made to address each finding. For example, the City should establish a policy to standardize investigations into all ADA complaints. And the City should regularly enlist people with a variety of disabilities to test the City website for accessibility and

ease of use. Implementation of the recommendations for more accessible City programs and services will occur over the next three years. Each recommendation and the fiscal year it will be addressed is included in the action plan.

To ensure we have the right resources in place to oversee implementation of this important plan, a vacant position in the Public Works Department is proposed to be elevated to an ADA Coordinator job classification, pending City Council approval of the Fiscal

Year 2024/25 budget. If approved, the City will recruit an ADA Coordinator and work to have the new hire in place in early 2025. The City’s Public Works Director will continue to serve in this role in the interim. The new ADA Coordinator will establish and lead an interdepartmental ADA Task Force that meets regularly. A primary focus of the ADA Task Force will be to address the recommendations noted in the table below for accessible City programs and policies.

The Transition Plan is a snapshot in time of prioritized barrier removal. As conditions change, the Transition Plan will be a living document that is modified and updated on a periodic basis to reflect barrier removal efforts, new conditions, changes in funding levels, new and revised strategies, and future public input. The Transition Plan will also require modification if new ADA requirements are issued by DOJ.

TRANSITION PLAN UPDATES

The ADA Coordinator will track progress on implementing the Transition Plan and report annually to the Commission on Persons with Disabilities. The update will note barriers removed and any revisions to the prioritization of barriers to be removed. The City’s ADA Coordinator is responsible for ensuring this update happens and is currently represented by Public Works Director Erin Smith who can be reached at esmith@alamedaca.gov or at 950 W Mall Square, Suite 110, Alameda, California or by phone 510-747-7938.

ACKNOWLEDGMENTS

Thank you for your time and contributions to this report!



INTRODUCTION

The City is committed to providing accessible programs, policies, and services, in accordance with the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act.



The City is committed to providing accessible programs, policies, and services, in accordance with the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act. The ADA is a federal civil rights law that mandates equal opportunity for individuals with disabilities. It prohibits discrimination against people

with disabilities in jobs, public accommodations, government services, public transportation, and telecommunications. Title II of the ADA requires state and local governments to make their programs and services accessible to persons with disabilities (28 CFR 35.149-35.151). This requirement extends not only to physical

access at government facilities, programs, and events, but also to pedestrian facilities in public rights-of-way. A full explanation of the ADA is in Appendix A. Section 504 of the Rehabilitation Act of 1973, as amended (Section 504), imposes similar prohibitions of discrimination in federal-assisted programs.



THE ADA IS A FEDERAL CIVIL RIGHTS LAW THAT MANDATES EQUAL OPPORTUNITY FOR INDIVIDUALS WITH DISABILITIES.

The City is required by regulations under Title II of the ADA and Section 504 to assess its services, policies, and practices as part of a Self-Evaluation; to modify any policies or practices that discriminate against people with disabilities; and to develop a Transition Plan identifying physical changes to facilities that are necessary to achieve program accessibility.

Program accessibility includes physical accessibility, but also entails all the policies, practices, and procedures that permit people with disabilities to participate in programs and services and to access important information. Program access may be achieved by either structural methods (e.g., making physical changes to a facility) or non-structural methods. Non-structural methods include acquisition or redesign

of equipment, assignment of auxiliary aids and assistance, or provision of services at alternate sites. While it is rare that the City may not be able to provide program access, there are some instances where it is permissible under the ADA. Access to each service, program, or activity is to be “viewed in its entirety.” Program access does not require each facility to be made physically accessible, in all instances, and equal access can be made available at times through creative solutions. However, physical accessibility is a requirement for all new facilities intended to provide programs, and for any facilities undergoing alteration, compliance issues should be remediated to the latest standards. The City does not have to take any action that the City can demonstrate would result in a fundamental alteration in its service, program, or activity, would create a hazardous condition, or would represent an undue financial and administrative burden. The determination that undue burdens would result must be based on an evaluation

of all resources available for use in the service, program, or activity. For example, if a barrier removal action is judged unduly burdensome, the City must consider other options and ensure that individuals with disabilities receive the benefits provided by the City.

A Transition Plan must include a list of the physical barriers in the City's facilities that limit accessibility; a schedule for elimination of barriers and compliance with Title II of the ADA; the methods that will be used to make facilities accessible; and the name of the individual responsible for the plan's implementation.

This document reports on the City's efforts to evaluate its City buildings and parks, pedestrian facilities in the public right of way, and City programs and policies for their degree of accessibility for all members of the public. The City last conducted an ADA Self-Evaluation and Assessment in 2008. This Self Evaluation and Transition Plan replaces the 2008 plan.




This document reports on the City's efforts to evaluate its City buildings and parks, pedestrian facilities in the public right of way, and City programs and policies for their degree of accessibility for all members of the public.

PUBLIC INPUT & COMMUNITY ENGAGEMENT

Public input is an essential component of developing an ADA Self Evaluation and Transition Plan. The objectives for public outreach prior to adopting the plan include:

 <p>PROVIDING</p> <p>Providing the public with information on the City’s responsibilities regarding ADA.</p>	 <p>LEARNING</p> <p>Learning from the community where they experience barriers to accessibility.</p>	 <p>SHARING</p> <p>Sharing results of the programs and policies review and where barriers were identified at City buildings and parks.</p>
 <p>HEARING</p> <p>Hearing from the community on how they prefer to prioritize improvements to remove barriers.</p>	 <p>SHARING</p> <p>Sharing with the public the City’s processes regarding removal of barriers to accessibility.</p>	 <p>MEETING</p> <p>Meeting Title II requirements for public comment opportunity.</p>



Outreach to encourage input included a news release, social media postings, a survey (available online and in print), City employee email announcements, flyers, in person and online public meetings and a City web page.

To garner feedback from the community, the City hosted the following:

Action/Event	Date
▪ Press release announcing kick off plan development and community survey	10/30/2023
▪ Public input survey	10/30/23-1/8/24
▪ Online Community Meeting	11/14/2023
▪ Commission on Persons with Disabilities	12/13/2023
▪ Meeting with Leisure Club Families (social program for adults with developmental disabilities)	3/14/24
▪ Recreation & Parks Commission	4/11/2024
▪ Transportation Commission	4/24/2024
▪ Draft Plan Available for Public Comment	5/7/2024
▪ Commission on Persons with Disabilities	6/5/2024
▪ City Council	6/18/2024

The public input survey had 24 questions related to Alameda’s accessibility. Survey questions ranged from people’s experience using the City’s website, what park they frequent most to whether they think City staff need more training regarding accessibility. 272 responses were received.

All summary statistics and narrative responses for the survey are included in Appendix B.

BELOW IS A SUMMARY OF KEY FINDINGS FROM THE SURVEY:



50% of respondents identify either as a person with a disability or as a caregiver to a person with a disability



30% of the respondents cannot or know someone who cannot participate in a City program or activity because of disability.



15% of respondents have experienced a communication barrier that prevented them from participating in a program, service, or activity.



Over 40% of survey respondents think there are areas where City staff need ADA and disability sensitivity training.



60% of respondents think the City provides adequate emergency response services to assist people with disabilities.



Over 50% of respondents have experienced a physical barrier to accessibility on a public pedestrian circulation path.

90%

90% of respondents reported the City’s website and phone system as accessible to them. However, 73% don’t know who to contact if they need assistance, have a concern or complaint, or need an accommodation to access a facility, service, or event.

15%

15% of respondents have countered a street or intersection crossing near a City building or park where missing or inoperable pedestrian crossing push buttons affect their ability to cross the street.

The Main Library and City Hall were reported as City buildings most frequented.

Community and Recreation Centers ranked highest for priority of barrier removal at building facilities with City Halls ranked second highest.

Sidewalks ranked highest for priority of barrier in the public right of way with curb ramps ranked second.



Parking stalls at the Alameda Public Library

The **Leisure Club** is hosted by the City’s Recreation and Parks Department and is a fun, activity based program specifically designed to meet the specialized recreational needs of persons with developmental disabilities in the community. 38 parents/guardians and Leisure Club participants were in attendance March 14, 2024. City staff led an engaging conversation about accessibility and creating a safe space for open dialogue. In general, this group would like the City to focus on more accessible parking in commercial areas and at City facilities; improved signage and location of ADA ramps at City facilities; more time to cross the street at intersections; improved access to public bathrooms (door openers, maneuverability, gender neutral bathrooms);

better lighting and sidewalk condition; more programs for youth, teenagers, and adults with special needs; and more integration and inclusion in City recreation programs. A complete listing of feedback is included in **Appendix B**.

Conducting the Self Evaluation also prompted input and awareness from City’s various departments. The ADA pertains to the many facets of work a municipal government does and is relevant to all City employees and the members of the public we serve. The feedback and input learned throughout the development of the Self Evaluation and Transition Plan informed the content of the plan and most notably, prioritization of work to enhance accessibility of the programs and services the City provides.

TO BE ACCESSIBLE:



Additional ADA parking will be installed as part of the Webster and Park Street restriping projects. Improvements to the pathway lighting at Lincoln Park are currently in design.

SITE EVALUATION

58 City buildings and/or sites were evaluated. The facilities listed below are organized into the following functional areas: Community Resources, General Administration and Transportation and Parking. The Lincoln Park and Franklin Park swimming pool sites are not on the facility list, as these sites are managed by the Alameda

Swimming Pool Association, per a lease agreement with the City. The Alameda Swimming Pool Association is responsible for maintaining lifts at each pool as is the Alameda Unified School District at Alameda and Encinal High Schools. Appendix H contains a list of City sites, their address and list of public amenities offered.

COMMUNITY RESOURCES

- Alameda Point Gym & Field
- Bayport Park
- Bill Osborne Model Airplane Field
- Bohol Circle Immigrant Park
- Chocheyno Park
- City View Skate Park
- Encinal Boat Launch
- Estuary Park
- Franklin Park & Recreation Center
- Grand St Boat Launch
- Godfrey Park & Recreation Center
- Harrington Park & Restrooms
- Jean Sweeney Park & Restrooms
- Krusi Park & Recreation Center
- Leydecker Park & Recreation Center
- Lincoln Park & Facilities
- Littlejohn Park & Recreation Center
- Longfellow Park & Restrooms
- Main Street Linear Park
- Main Street Soccer Field
- Main Street Dog Park
- Marina Cove Waterfront Park
- Marina Village Park
- Mastick Senior Center
- McKinley Park & Recreation Center
- Officer's Club
- Rittler Park
- Seaplane Lagoon Promenade
- Shoreline Park
- Tillman Park & Recreation Center
- Towata Park
- Veterans Memorial Building
- Washington Park
- Whale Park
- Woodstock Park
- Bay Farm Library
- Main Library
- West End Library

GENERAL ADMINISTRATION

- City Hall
- City Hall West
- Maintenance Service Center
- Fleet Services Garage
- Recreation & Park Admin Building
- Emergency Operations Center
- Fire Stations
- Police Station

TRANSPORTATION AND PARKING

- Harbor Bay Ferry Terminal
- Main St Ferry Terminal
- Seaplane Lagoon Ferry Terminal
- Civic Center Parking Garage
- Parking Lot A- Park Ave
- Parking Lot B- Alameda Av
- Parking Lot - West End



A Bureau Veritas Subject Matter Expert visited each site to evaluate the facilities in accordance with the ADA and State of California Building Code and assess the property improvements' compliance with the Title II provisions of the ADA and applicable state requirements.

The field observer conducted a thorough review to observe and identify barriers to accessibility and formulate recommendations to remedy the physical barriers. As a part of the review, the field observer met with City staff with specific knowledge of the facility to gain a clear understanding of overall features, public use

patterns, and relevant historical data. All features of the property are subject to observation, which includes but is not limited to parking lots, sidewalks, access ramps, and all common areas accessible to the public, as well as employee areas.

During the site walk-through, the field observer followed a Survey Form that meets or exceeds the current Americans with Disabilities Act Accessibility Guidelines (ADAAG) format and utilized a digital level, measuring tape, pressure gauge, and digital camera. The field observer identified and prioritized any existing improvements not in accordance with the

applicable ADA requirements in the order of preference as set out by the DOJ in general categories and refined by Bureau Veritas. Examples of elements required to be accessible are:

- Parking and passenger loading zones;
- Accessible routes including sidewalks and paths and interior routes;
- Ground and floor surfaces;
- Curb and other ramps;
- Platform lifts (wheelchair lifts);
- Handrails and grab bars;
- Alarms (visual and audible) and warnings; and
- Switches and outlets



Individual barriers identified at each location are assigned a priority level based on the following:

PRIORITY 1:

■ PATH OF TRAVEL

Accessible Van Parking

Access to a public facility begins with accessible parking. Van accessible parking is deemed the most important barrier. Those with the most severe disabilities tend to require a van accessible space to accommodate their vehicle and mobility device. In addition, when only one accessible space is required, it must be a van accessible space. This priority includes all barriers associated with the compliance of a van accessible space including signage, restriping, constructing or reconfiguring the pavement to accommodate the required number of spaces.

Accessible Car Parking

Access to a public facility begins with accessible parking. Car accessible parking is deemed the second most important barrier. This priority includes all barriers associated with the compliance of a van accessible space including signage, restriping, constructing or reconfiguring the pavement to accommodate the required number of accessible spaces.

Accessible Approach & Entrances

A public agency is required to take measures to provide access to a place of public accommodation and employee areas from public sidewalks, accessible parking, or public transportation. The DOJ dictates the minimum width, cross and running slope, signage, and handrail requirements associated with pedestrian accessible routes of travel. These measures include, for example, installing an entrance ramp, correcting tripping hazards or lessening the slope of a curb ramp. At least one route of travel to each amenity or feature should be safe and accessible for everyone, including people with disabilities.

PRIORITY 2:

■ ELEMENTS USED FOR PROGRAMS, SERVICES, AND ACTIVITIES

Barriers may need to be removed to play equipment, picnic tables, public counters, benches, and trash receptacles.

PRIORITY 3:

■ RESTROOMS, SIGNAGE

Barrier removal may include widening of toilet stalls, installation of grab bars, and lowering lavatories and mirrors.

PRIORITY 4:

■ ACCESS TO AUXILIARY FEATURES AND AMENITIES

A public agency is required to take measures to provide access to auxiliary features and amenities along paths of travel, for instance, kiosks, water fountains, and kitchen appliances.

PRIORITY 5:

■ EMPLOYEE-ONLY AREAS

Employee-only areas are required to have accessible entrances and exits, and accessible paths of travel within interior work areas and workstations. Corridors in employee-only areas, employee-only restrooms, employee-only kitchens and employee-only break rooms are considered public areas (rather than employee-only areas) under the ADA, and therefore, are required to fully comply with accessibility regulations governing those types of areas. This plan focuses on barrier removal in public areas since the City has specific programs for workspace safety and access. Additionally, employee areas are addressed through a reasonable accommodation process, as needed, under Title I of the ADA. More information on Title I of the ADA can be found in Appendix A.

Appendix I contains a summary list of barriers at each facility and their designated priority level.

An ADA Facility Assessment Report was prepared for each site and is available under separate cover by contacting the City's ADA Coordinator. Each report contains a summary of findings and individually recorded barriers including a photo of the observed deficiencies, a geocode reference point, applicable standards, recommendations to address and planning level costs. The reports are a snapshot of the facility at

the time of evaluation. In some cases, the items contained in the reports are not required to be remediated because those items were compliant at the time of construction or alteration, or other options are available to the City to provide similar accessible programs, activities, and services. The reports do not necessarily reflect actions that the City must undertake, but rather constitute a list of elements that were not consistent with accessibility standards current at the time of the evaluation. Assessment results were also

tabulated into an ADA database using AssetCALC™, an online interactive database created by Bureau Veritas to manage ADA and state accessibility code information. The City intends to export the database used by Bureau Veritas and import the data into its asset management and work order software, Lacity. This will provide the ability to list, prioritize, query, and track accessibility barrier removals. Cost data in the database is estimated at the time of report writing, actual costs may vary.



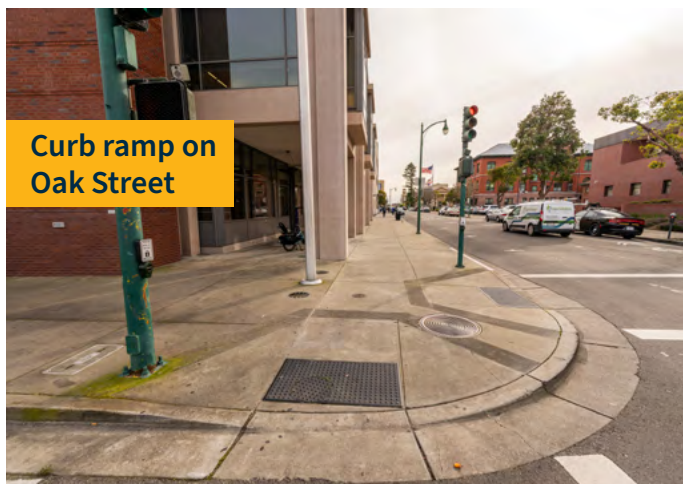
A TRANSITION PLAN ASSISTS IN TURNING INACCESSIBLE FACILITIES INTO ACCESSIBLE ENVIRONMENTS USABLE BY INDIVIDUALS WITH DISABILITIES.

PEDESTRIAN FACILITIES IN THE PUBLIC RIGHT OF WAY

2,862 curb ramps, 89 signalized intersections, 220 miles of sidewalk and 22.6 miles of pathways were evaluated using the Public Right-of-Way Accessibility Guidelines (PROWAG) and the California Building Code.

Transit stops, crosswalks and other controlled pedestrian crossings (ex. Rectangular Rapid Flashing Beacons) still need to be evaluated and once complete, will be added to the Transition Plan as part of a future update. PROWAG are technical guidelines published by the US Access Board under the ADA and Architectural Barriers Act to address access to sidewalks and streets, crosswalks, curb ramps, pedestrian signals, on-street parking, and

other components of public right-of-way. Although PROWAG has yet to be formally adopted by the USDOJ/DOT, it clearly spells out the minimum level of access required by the ADA in the public right of way. PROWAG took effect September 7, 2023, and will become enforceable once adopted by the USDOJ/DOT. All data obtained for this evaluation was documented in a geographic information system (GIS) database.

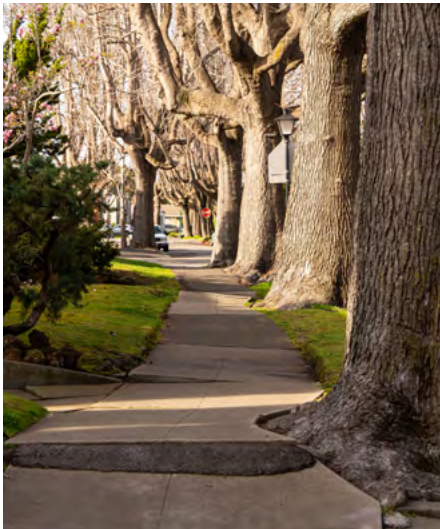


PROWAG requires pedestrian access routes to be level, with a firm and slip resistant surface. The term “level” refers to the cross slope (the slope perpendicular to the path-of-travel) of the sidewalk route and has an allowable 2% tolerance. Obstructions are not allowed in the path-of-travel, which is 4 feet wide and 80 inches high. Typical obstructions in the path of travel include



overgrown foliage, utility poles, fire hydrants, traffic signs and signals.

Vertical displacements are difficult for wheelchairs to push their wheels over and can form tripping hazards for the visually impaired and the average pedestrian. Vertical displacements greater than 1/4 inch on the pedestrian access route is considered a barrier to accessibility.



Many sidewalk barriers are the result of tree roots which tend to grow under sidewalks and lift the concrete slabs, creating vertical displacements. Tree roots can also lift one side of the sidewalk, creating a cross slope barrier that exceeds the allowable tolerance and creates a tripping hazard. The City has a Master Street Tree Plan which provides guidance for the repair of sidewalks damaged by trees and outlines a procedure where trees may be removed if no mitigation is available to maintain an accessible sidewalk.

PROWAG generally requires curb ramps wherever pedestrian access routes cross curbs, such as at street corners or mid-block crossings. To be accessible, curb ramps must have certain dimensions and slopes and have a detectable warning for the entire length and width of the curb ramp.

Many pedestrian crossings along access routes are supplemented with pedestrian signals.

These signals communicate to pedestrians when the right-of-way has been granted to them. Most City traffic signals are equipped with pedestrian signal displays that provide lighted symbols that are universally understood to indicate when right-of-way has been granted to pedestrians. The WALKING PERSON symbol indicates when right-of-way has been granted and pedestrians are permitted to leave the curb or shoulder; a flashing UPRAISED HAND symbol lets pedestrians know the pedestrian phase is about to end, pedestrians in the crosswalk should clear the crosswalk as quickly as possible, and no more pedestrians should enter the crosswalk from the curb or the shoulder; and, a steady UPRAISED HAND symbol warns pedestrians that they do not have the right-of-way to be in the crosswalk.

Some pedestrian signals and hybrid beacons also supplement the pedestrian indications with countdown timers. This alerts pedestrians



to the length of the time that is available for pedestrians to enter the crosswalk and to the amount of time remaining that a pedestrian has to clear the intersection before the right-of-way is assigned to conflicting vehicle movements.

All components of a pedestrian signal system or pedestrian beacon and all information communicated to pedestrians must be readily accessible and effectively communicated



to people with disabilities. Accessible pedestrian signals (APS) communicate information about the WALK and DON'T WALK intervals at the crossing. APSs provide auditory, visual, and vibrotactile information to pedestrians who are blind or who have low vision, who may also have hearing loss, so they can know when they should begin to cross at a signalized intersection. They essentially translate visual pedestrian information to other sensory formats, enabling people with disabilities to navigate cities safely and comfortably.

SIDEWALKS AND PATHWAYS

Sidewalk data was collected November 2022- February 2023 using pathVu’s “pathMet” sidewalk profiler. Pathway data was collected in January 2024 using the same equipment. pathMet is a manually propelled, multi-sensor, stroller-type profiling tool. It uses GPS and high-resolution cameras, lasers, and sensors to measure ADA compliance of sidewalks and pathways, including cross slope, running slope, surface smoothness, and vertical changes in level.

Data is provided for each 10-foot run segment including an aggregated Route Accessibility Index (RAI). The RAI ranges from 0 to 100 and is a weighted scale of the vertical change in level (40%), smoothness of the surface (15%), running slopes (5%) and cross slopes (40%). A sidewalk or pathway section with a high score such as 90 to 100 is considered good to great with few or no barriers to accessibility. A sidewalk section with a lower score such 50 has multiple barriers to access. The RAI conforms to ASTM E3028.

The sidewalk data can also be presented as the number of instances of each barrier type:

- 1,372 instances where overgrown vegetation reduced the sidewalk clear width to less than the minimum of 48”.
- 132 instances where the vertical clearance was reduced to less than 80” by overhanging vegetation or other objects.
- 33,613 instances where vertical change in level was greater than the allowable 1/4”. These are also considered tripping hazards.
- 149.6 miles of sidewalk with a cross slope greater than 2%.





TO BE ACCESSIBLE:



The City has a Master Street Tree Plan which provides guidance for the repair of sidewalks damaged by trees and outlines a procedure where trees may be removed if no mitigation is available to maintain an accessible sidewalk.

PATHWAYS

For pathways, number of instances of each barrier type are as follows:

- 109 instances where the vertical clearance was reduced to less than 80” by overhanging vegetation or other objects.
- 165 instances where overgrown vegetation reduced the pathway clear width to less than the minimum of 48”.
- 11 miles of pathway with a cross slope greater than 2%
- 2,254 instances where vertical change in level was greater than the allowable 1/4”.



Overgrown vegetation reduces the pathway



CURB RAMPS

Curb ramps were assessed using pathVU’s “curbMet” assessment tool. The running slope, cross slope, flare slope, landing slope, clear width and length dimensions, presence of detectable warning, damage, obstructions, and other data points were collected for each ramp. A weighted score of the various attributes was calculated for each curb ramp. A score of 0 is noted for locations where a curb ramp is required but missing. A score of 5 is compliant or nearly compliant with PROWAG and other standards. The curb ramp score can be used to determine barrier removal prioritization and phasing. A comprehensive data set has been provided to the City for inclusion into the City’s existing GIS system.

28 locations were identified as needing a curb ramp where one did not exist. Accessibility scores for curb ramps evaluated are summarized in the Table. Curb ramps with a score of 5 are compliant or nearly compliant.

Curb Ramp Accessibility Score	Number of Curb Ramps	Percent of Total
Unable to be Scored	15	0.5%
1	20	0.7%
2	190	6.6%
3	393	13.7%
4	706	24.7%
5	1,538	53.7%
Total	2,862	





TO BE ACCESSIBLE:



Curb ramps must have certain dimensions and slopes and have a detectable warning for the entire length and width of the curb ramp.

SIGNALIZED INTERSECTIONS

A Bureau Veritas Subject Matter Expert visited 89 signalized intersections within the City. For each controlled pedestrian crossing presence of a pedestrian signal head, countdown display, accessible pedestrian signal and audible and tactile tone for the accessible pedestrian signal was documented.

Each signalized intersection can have up to 8, and sometimes more, pedestrian signal systems. One for each directional crossing. Bureau Veritas identified 42 pedestrian signals without the countdown display informing pedestrians of the number of seconds remaining in the pedestrian change interval. They noted 105 individual crossings missing accessible pedestrian signals and of 495 accessible pedestrian signals they did identify, 47 were missing either an audible or vibrotactile tone.



All components of a pedestrian signal system or pedestrian beacon and all information communicated to pedestrians must be readily accessible and effectively communicated to people with disabilities.



Intersections at Sherman - Atlantic
and below: Saratoga - West Tower



TO BE ACCESSIBLE:



All components of a pedestrian signal system or pedestrian beacon and all information communicated to pedestrians must be readily accessible and effectively communicated to people with disabilities.



The City aims to elevate disability access to all City programs, activities, and services.

CITY SPONSORED PROGRAMS AND SERVICES

Programs, activities, and services offered by the City must be accessible.

As part of the self-evaluation process, City policies, practices and programs were reviewed to ensure that they do not adversely affect the full participation of individuals with disabilities. This process included an accessibility questionnaire for City departments and a review of the policies and practices provided by City staff and review of the City's website.

The self-evaluation findings in this section are organized into categories based on the requirements of Title II of the ADA. Each category includes a brief description,

required actions for compliance, and findings. Recommended actions to address deficiencies are included in the Transition Plan.

The City also reviewed its organizational infrastructure to support implementation of the Plan. The City aims to elevate disability access to all City programs, activities, and services through the integration of universal design principles and inclusive policies. The recommendations contained in this section will serve as a basis for the implementation of specific strategies that will improve access to City programs.

COMMUNITY-BASED PROGRAMS & ACTIVITIES

Programs and services provided by the City must not discriminate against individuals with disabilities. This extends to providing programs (such as exercise, recreational, swimming, etc.) in an integrated setting. Providing segregated/separate programs for individuals with disabilities is not acceptable. Additionally, programs that have presentations and use audio/amplified communication (i.e., microphones) need to accommodate individuals with hearing disabilities.

FINDINGS:

- The City does not have a written policy/procedure in place that speaks to accessibility for City hosted or sponsored special events. This document should provide the basis of ADA requirements to where all special events are held.
- The City does not have an accessibility page on their website that provides a list of all accessible features at the facilities, including parking, playgrounds, restrooms, and picnic shelters.
- The City does not provide a statement on their website under each program, service, and activity that accommodation can be provided.
- The City does not have a written policy/procedure that provides staff with training in supporting individuals of all abilities in all programming where they meet prerequisite requirements with or without reasonable accommodation.
- The City does not have policies on their websites regarding the use of service animals and wheelchairs and manually powered mobility aids.
- The City’s Recreation and Parks Department hosts programs at facilities owned by other Title II and Title III entities, that may not be accessible.
- The City has lease agreements with third-party entities, like the Alameda Swimming Pool Association. The agreements state the lessee is responsible for maintaining lifts at each pool.
- The City’s Recreation and Parks Department provides ADA accommodations, as needed, but does not have written policies and procedures addressing ADA accommodations requests from the public.
- The City’s Recreation and Parks Department does not charge an additional program fee if an individual with a disability requires their own personal assistant to participate.
- The City’s Recreation and Parks Department will accommodate an applicant or participant to a program, including the possible moving of the program to an accessible location.
- Multiple parks have playgrounds with engineer wood fiber that have not been maintained for accessibility. Furniture and stored items placement throughout the facilities obstruct the required maneuvering clearances.



IMPROVE ACCESSIBILITY IN PARKS

A primary goal is to optimize the use of available funds to provide access to public amenities that matter most to the public.

HOUSING

Residential facilities with residential dwelling units shall comply with Section 233 and with the technical and scoping requirements in Chapters 1 through 10 of the 2010 ADA Standards for Accessible Design. These facilities may also be subject to the requirements of the Fair Housing Act (FHA), Section 504 of the Rehabilitation Act of 1973, as amended and/or The US Department of Housing and Urban Development (HUD).

FINDINGS:

- The City maintains two websites that deal with various aspects of housing in Alameda, [Alameda Housing Authority](#) and the [City of Alameda Rent Program](#). The City of Alameda has a robust housing program to include senior, low income housing, and programs such as the Single Room Occupancy (SRO), Moderate Rehabilitation (Mod Rehab) program, the Shelter Plus Care (SPC) program, and the Family Self Sufficiency programs. Eligibility is income based.
- Applications may be submitted online, in-person, email, mail, or fax. Contact information is provided.
- Information regarding reasonable accommodation policies and procedures (i.e., modifications to a unit, allowing a tenant to have an emotional support animal and other disability-related issues) was provided on the City's website.

PERSONNEL AND INTERNAL POLICIES AND PROCEDURES

No qualified individual with a disability shall, on the basis of disability, be subjected to discrimination in employment under any service, program, or activity conducted by a public entity.

FINDINGS:

- The City has very extensive and thorough policies ranging from administrative, personnel, rules, and regulations to miscellaneous categories. Key administrative policies reviewed include:
 - **Drug Free Workplace Policy:** The policy details requirements related to use of controlled substances while on City property or when working off property. Disciplinary and the Employee Assistance Program (EAP) is described.
 - **Prohibiting Harassment, Discrimination & Retaliation Policy:** Disciplinary policies are thoroughly detailed.
 - **Evacuation Procedures for the City of Alameda Policy:** Policy does not include information on assisting people with disabilities in emergency evacuation.
 - **Family and Medical Leave (FMLA)/Leave for Spouses of Military Personnel; Domestic Violence/Sexual Assault Leave:** The City of Alameda has an extensive policy on FMLA.
 - **Personnel Files:** The policy does not state that reasonable accommodation and medical information regarding an employee is maintained in a separate file.
- The City does not have a Workplace Violence policy in the Employee Policy Handbook.
- The City does not have a Corrective Action and Disciplinary policy in the Employee Policy Handbook.
- The City does not have an ADA grievance procedure regarding employees.
- The City does not have a written ADA reasonable accommodation and procedure policy regarding employees.

■ HUMAN RESOURCES: POSITION DESCRIPTIONS

Title I of the ADA prohibits employers from discriminating against qualified individuals with disabilities in job application procedures, hiring, firing, advancement compensation, job training, and other terms, conditions, and privileges of employment. The ADA covers employers with 15 or more employees and includes State and local governments. No qualified individual with a disability shall, on the basis of disability, be subjected to discrimination in employment under any service, program, or activity conducted by a public entity.

FINDINGS:

- Several position descriptions were reviewed including the following:
 - Combination Building Inspector
 - Crime Scene Specialist
 - Facility Attendant
 - Gardener
 - Police Assistant
 - Tennis Instructor
- Job descriptions are not separated out by essential job functions and non-essential job functions. It is not clear which functions are essential and non-essential.
- Most job descriptions do not provide a “Working Condition/Physical Abilities” section.
- Most job descriptions do not include information about the work environment, such as office or outdoor and travel requirements.
- All job descriptions use inclusive language.
- All job descriptions include an Equal Employment Opportunity (EEO) statement and provide contact information for accommodation requests.
- All job descriptions include a disclaimer language to remind employees/applicants that the description is subject to change.

■ ADA COORDINATOR

Title II also requires a designated accessibility coordinator to ensure the resolution of complaints and by inference, an employee or employees who will coordinate removal of barriers. A public entity that employs 50 or more persons shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under this part, including any investigation of any complaint communicated to it alleging its noncompliance with this part or alleging any actions that would be prohibited by this part. The public entity shall make available to all interested individuals the name, office address, and telephone number of the employee or employees designated pursuant to this paragraph.

FINDINGS:

- There is an ADA Coordinator who investigates all complaints alleging that the government does not comply with the ADA.
- The ADA Coordinator is currently the Public Works Director.
- All roles and responsibilities of the ADA/504 Coordinator were not found on the City website.
- A standardized investigation into all complaints is not provided.

■ NOTICE OF THE ADA'S PROVISIONS

An ADA Public Notice is required by all state and local governments covered by title II, even entities with less than 50 employees. The target audience for the notice includes everyone who interacts with or would potentially interact with the title II entity. The notice should include relevant information regarding Title II of the ADA, and how it applies to programs, services, activities of the public entity, and the contact information of the ADA coordinator. The head of the public entity shall determine the most effective way of providing the public notice and provide the information on an ongoing basis. Information must be accessible to all and available in alternative formats (recording, radio announcement, large print, Braille, HTML format)

FINDINGS :

- The City of Alameda does not post clear information to the public that the ADA applies to all services, programs, and activities the City provides.

■ GRIEVANCE PROCEDURES

Title II of the ADA requires government entities to establish a complaint procedure for both the public and employees. A public entity that employs 50 or more persons shall adopt and publish grievance procedures providing for prompt and equitable resolution of complaints alleging any action that would be prohibited by the ADA. The complaint procedure must include an accessible method of filing an accessibility complaint, such as a grievance procedure and grievance form posted on the city website.

FINDINGS :

- The City of Alameda has a grievance procedure that follows the DOJ recommendation. See **Appendix E**.
- Grievance/appeal forms were not located.



■ GENERAL EFFECTIVE COMMUNICATIONS

Title II of the ADA requires that all state and local government take steps to ensure their communications with people with disabilities are as effective as communications with others. This requirement is referred to as “effective communication” and is required except where a state or local government can show that providing effective communication would fundamentally alter the nature of the service or program in question or would result in an undue financial and administrative burden. Effective communication applies to all members of the public with a disability, including job applicants, program participants, people who contact the state or local government seeking information about programs, services, or activities.

FINDINGS:

- Section 2-91.13 of the City’s Sunshine Ordinance - Chapter 2, Article IV of the City’s Municipal Code – prohibits barriers to a person with a disability from attending any policy body meeting or other event.
- The City does not have written policies and procedures on General Effective Communications, but provides accommodations such as providing sign language interpreters, assisted listening devices, remote/handheld microphones when a speaker cannot stand at a podium, Braille format for written materials, and moving meetings to accessible locations as needed. Request for accommodations are made by contacting the City Clerk’s office: clerk@alamedaca.gov or 510-747-4800.
- The City of Alameda does not have a written policy and procedures in place to deal with requests from the public for sign language, oral, cued speech interpreters.
- The City of Alameda does not have employees who are qualified interpreters and does not have a formal arrangement with one or more vendors to provide interpreting services when needed.
- The City of Alameda does not have a written policy or procedure to deal with requests from the public for documents in Braille, large print, audio, recording, and accessible electronic format.
- The City of Alameda does not have a written policy or procedure to deal with requests from the public for notetakers, computer-assisted real-time transcription services, and other auxiliary aids. However, there are assisted listening devices in the Council Chamber.
- The City of Alameda does not have equipment or arrangements with vendors to provide written materials in alternative formats. The City can provide text in an enlarged format.
- The City of Alameda does not have a written policy to ensure all videos are provided with captioning and audio description.
- The City of Alameda does not have a dedicated text telephone number for the public.
- Telecommunication Relay Services and Video Relay Services are not answered in the same ways as other telephone calls.



This document reports on the City’s efforts to evaluate its City buildings and parks, pedestrian facilities in the public right of way, and City programs and policies for their degree of accessibility for all members of the public.



WEBSITE ACCESSIBILITY

The DOJ has stated, as they have in the past with other elements, spaces, or technologies for which there are no technical accessibility specifications, that the absence of a technical standard does not “serve as a basis for noncompliance” with the ADA’s general obligation to ensure equal access to goods and services; rather, it means that entities have flexibility in how to facilitate that access. There are standards and guidelines that can help web developers create and maintain accessible websites. For example, the Web Content Accessibility Guidelines (WCAG) developed by the global Web Accessibility Initiative (WAI), which is part of the World Wide Web Consortium, the main international standards organization for the Internet, have long been available, and DOJ has often referred to these guidelines as a way of measuring the accessibility of websites.

FINDINGS:

- A written policy on website accessibility is not provided on the City’s website.
- The website manager does not check the HTML of all new webpages to confirm accessibility before pages are posted.
- Text-based versions of documents (ex. HTML, RTF, or word processing format) are not provided when PDF files are added to the website.
- There is no written plan including time frames in place to make all existing web content accessible.
- The City of Alameda has not asked disabilities groups representing a wide variety of disabilities to provide feedback on the accessibility of their website.
- A plan to improve website accessibility and invitation for improvement has not been posted on the City’s website.
- In-house and contractor staff who create web content or post it has not received copies of the Department of Justice’s’ technical assistance document “Accessibility of State and Local Government Websites to People with Disabilities”? See **Appendix F**.
- There is no procedure to assure a quick response to website visitors with disabilities who are having difficulty assessing information or services available via the website.
- A thorough review for ADA compliance has been performed. Results can be found in **Appendix G**.

9-1-1 AND EMERGENCY COMMUNICATION SERVICES

The ADA requires that all Public Safety Answering Points (PSAPs) provide direct and equal access to their services for people with disabilities who use teletypewriters (TTYs). PSAPs must receive TTY calls directly without relying on an outside relay service or third-party services. Telephone emergency services provided for TTY users must be as effective as those provided for people who make voice calls. All basic emergency services provided by public safety agencies are covered, including police, fire, and ambulance services. Direct, equal access must be provided to all services included in the system.

FINDINGS:

- The City has TTY or TTY-compatible equipment at every emergency communications service call-taking position.
- The City's back-up procedure in case of equipment malfunctions, telephone line malfunctions, or power failure is to route 911 calls to the Alameda County Sheriff's Office. TTY calls route with the transfer.
- The response time, quality of service, offered features and hours of operation of the telephone emergency services provided for TTY users equal to the response time of the services provided to others.
- All emergency call takers respond to each silent, open line call by querying the line with a TTY.
- The City has procedures for maintaining TTYs and TTY-compatible equipment that are as effective as the maintenance procedures for voice telephone equipment.
- TTY training is mandatory for all emergency communications services personnel who may have contact with individuals from the public who have hearing or speech disabilities. However, the City does not offer refresher training for TTYs.
- The City does not have a documented frequency to test their emergency services to ensure direct, equal access for people using TTY.



EMERGENCY MANAGEMENT

One of the primary responsibilities of state and local governments is to protect residents and visitors from harm, including assistance in preparing for, responding to, and recovering from emergencies and disasters. State and local governments must comply with Title II of the ADA in the emergency- and disaster-related programs, services, and activities they provide. This requirement applies to programs, services, and activities provided directly by state and local governments as well as those provided through third parties, such as the American Red Cross, private nonprofit organizations, and religious entities. Under Title II of the ADA, emergency programs, services, activities, and facilities must be accessible to people with disabilities and generally may not use eligibility criteria that screen out or tend to screen out people with disabilities. The ADA also requires making reasonable modifications to policies, practices, and procedures when necessary to avoid discrimination against a person with a disability and taking the steps necessary to ensure effective communication with people with disabilities. The ADA generally does not require state or local emergency management programs to take actions that would fundamentally alter the nature of a program, service, or activity or impose undue financial and administrative burdens.

FINDINGS:

- The City has an agreement, which needs to be formalized, with Red Cross for emergency sheltering, but the agreement does not contain policies and procedures to ensure compliance with the ADA.
- The City does not have written procedures to regularly seek and use input from persons with a variety of disabilities and organizations with expertise in disabilities in all phases of emergency planning and during emergency simulations.
- The City is in the process of developing an evacuation plan. This plan intends to address evacuation needs of people who have mobility disabilities, people who are blind or have low vision, people who are deaf or hard of hearing, people with cognitive and psychiatric disabilities, people who use service animals, and other people with disabilities who may need evacuation assistance.
- The City is currently developing a voluntary database where the public can provide their demographics to aid emergency operations staff in identifying those who need assistance.
- The database will aid staff with ordering specific resources such as individualized notification, evacuation assistance, and transportation including accessible transportation. The City plans to host monthly workshops at the Library and Senior Center to assist members in signing up for the voluntary database.
- The City works with Red Cross and has conducted accessibility surveys at most emergency shelter facilities. No barriers to accessibility have been identified at the facilities that have been surveyed.
- The City has not adopted written policies and procedures to maintain accessible features at emergency shelter facilities.
- The City of Alameda has not adopted written policies and procedures for shelter staff and volunteers to aid people who are blind or have low vision.
- The City does not have supplies of informational materials routinely handed out at emergency shelters available in alternative formats (Braille, large print) for people who are blind or have low vision.

- The City does not provide “stress-relief” zones at any emergency shelters.
- The City does not have procedures to provide site-specific instructions to staff/volunteers assisting people with disabilities.
- The City does not provide TTYs at all emergency shelters.
- The City does not have written policies and procedures to ensure emergency shelters are accessible to people with disabilities who use service animals.
- The City does not have written policies and procedures to ensure emergency shelters are accessible to people with disabilities who use medical equipment, require medication, have dietary restrictions, or use a mobility device.
- The City does not have written policies and procedures to make sure benefit programs assisting people harmed by emergencies and disasters are accessible to people with disabilities.
- The City does not have written policies and procedures to ensure that programs relocated from a damaged facility remain accessible to people with disabilities.



THE TRANSITION PLAN, ACCESSIBILITY FOR ALL

It is not possible to implement the programs and services recommendations and remove all physical barriers to accessibility at once.

Programs will be developed and/or enhanced and barriers removed based on a prioritized schedule. The goal of this Transition Plan is to ultimately ensure that programs, services, and opportunities offered by the City are accessible to the community, regardless of ability, yet provide a realistic implementation plan given the City's fiscal capabilities and staffing capacity.

The Transition Plan is a snapshot in time of prioritized barrier removal. As conditions constantly change, the Transition Plan will be a living document that is modified and updated on a periodic basis to reflect barrier removal efforts, new conditions, changes in funding levels, new and revised strategies, and future public input. The Transition Plan will also require modification if new ADA requirements are issued by DOJ.

To ensure we have the right resource in place to oversee implementation of this important plan, a vacant position in the Public Works Department is proposed to be elevated to an ADA Coordinator job classification, pending City Council approval of the Fiscal Year 2024/25 budget. If approved, the City will recruit an ADA Coordinator and hope to have the new hire in place in early 2025. The ADA Coordinator will track progress on implementing the Transition Plan and report annually to the Commission on Persons with

Disabilities. The update will note barriers removed and any revisions to the prioritization of barriers to be removed. The new ADA Coordinator will also establish and lead an interdepartmental ADA Task Force that meets regularly. A primary focus of the ADA Task Force will be to address the recommendations noted in the table below for accessible City programs and policies.

Erin Smith, the City's Public Works Director currently serves as the City's ADA Coordinator. She can be reached at esmith@alamedaca.gov or at 950 W Mall Square, Suite 110, Alameda, California or by phone 510-747-7938.

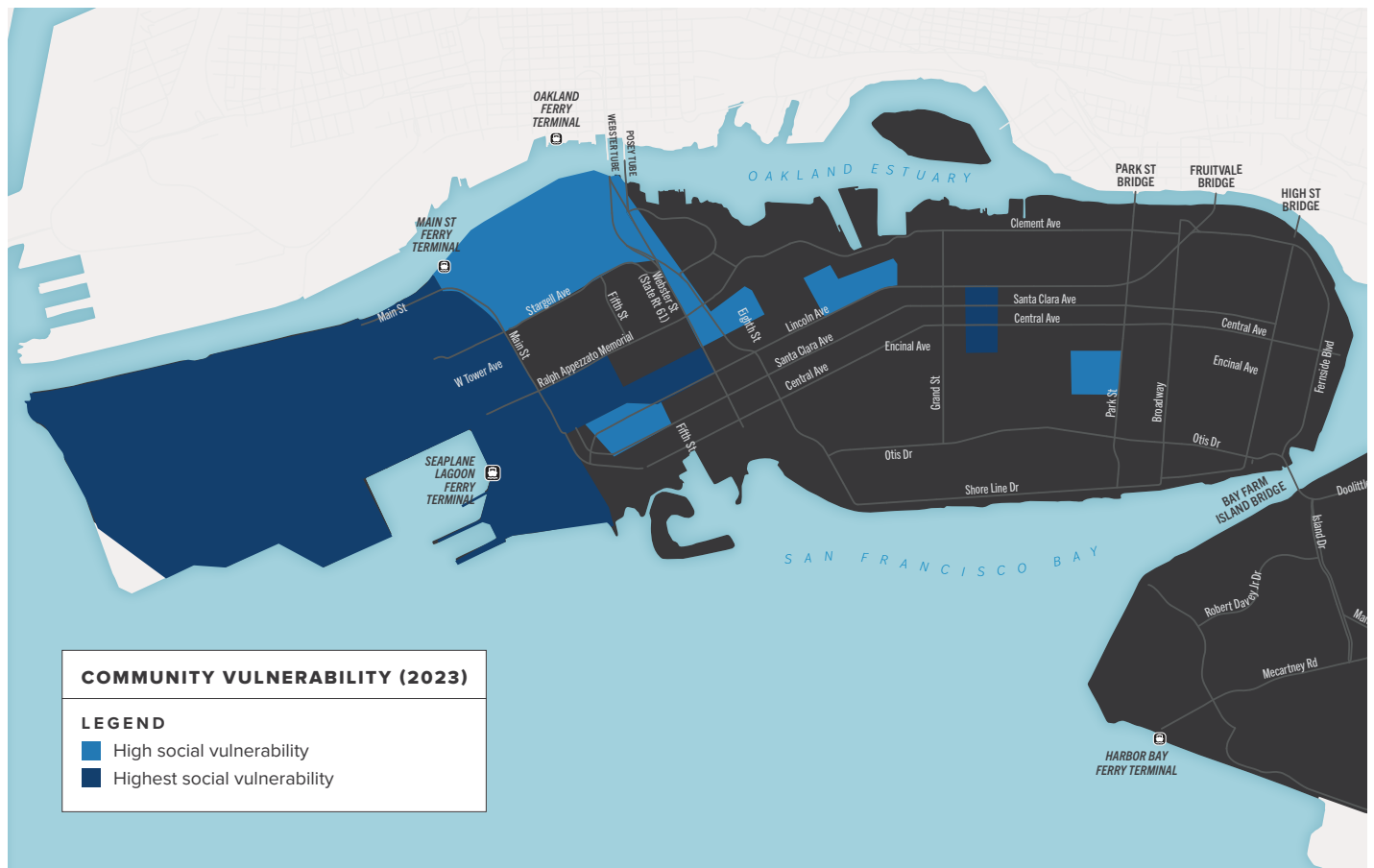
The estimates for repair noted throughout this report are based on invoice or bid documents provided either by the City and/or construction costs developed by construction resources such as R.S. Means and Marshall & Swift, Bureau Veritas' experience with past costs for similar properties, city cost indexes, and assumptions regarding future economic conditions. Planning level estimated values for barrier removal will change over time due to inflation, changes in construction practices and materials, and unanticipated changes or additions to accessibility regulations. 20% was added to the repair cost to account for staff time, permitting and inspection.


COMMUNITY VULNERABILITY

The City is committed to prioritizing those who are disproportionately impacted by current conditions and are most vulnerable to accessibility barriers.

In accordance with the City’s General Plan Policy, this Transition Plan considers other city-wide capital improvements that will “Prioritize the transportation improvements needed to serve the most vulnerable communities, including youth, seniors, those with limited mobility, those with limited income, and historically underserved communities.” (General Plan Policy ME-3, Mobility Element)

In 2020, the San Francisco Bay Conservation and Development Commission developed a dataset to better understand community vulnerability. That dataset was updated in 2023 based on the American Community Survey 2017- 2021 5-year estimates. The map below shows City of Alameda neighborhoods designated as either High or Highest Socially Vulnerable.



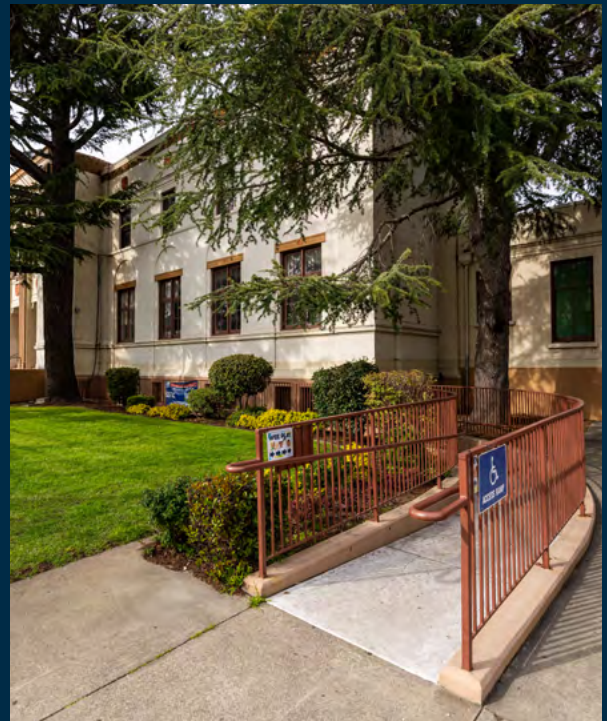
 The goal of this Transition Plan is to ultimately ensure that programs, services, and opportunities offered by the City are accessible to the community, regardless of ability, yet provide a realistic implementation plan given the City’s fiscal capabilities and staffing capacity.



IMPROVING ACCESSIBILITY AT CITY BUILDINGS AND PARKS

The Transition Plan prioritizes public amenities that are in highest demand. It considers usage levels, amenity uniqueness, site safety, public input, and other considerations. A primary goal is to optimize the use of available funds to provide access to public amenities that matter most to the public.

The Transition Plan organizes facility barrier removal into five phases with each phase’s funding considered as part of City’s two-year budget process. To comply with the ADA as the phases are implemented, the City will make accommodations for the disabled when requested.



The facilities in each phase, number of barriers and planning level cost estimates are summarized in this Table. An ADA Facility Assessment Report for each site is available under separate cover by contacting the City’s ADA Coordinator. **Appendix I** contains a summary list of barriers at each facility and their designated priority level.

Facility / Building	Estimated Cost*	No. of Items
Phase One (Fiscal Years 2023/24 – 2024/25)		
City Hall	\$350,125	192
Recreation & Park Admin Bldg	\$102,756	48
Mastick Senior Center & Grounds	\$807,068	265
Veterans Building & Grounds	\$502,660	208
Main Library	\$91,190	82
Longfellow Park & Restrooms	\$27,822	45
Washington Park & Facilities	\$259,170	123
Parking Lot A- Park Avenue	\$33,120	15
Parking Lot C – Alameda Ave	\$48,810	15
Parking Lot W – Haight Ave	\$41,730	15
Harbor Bay Ferry Terminal	\$83,084	26
Civic Center Parking Garage	\$97,969	30
Total Phase One	\$2,445,504	1064
Phase Two (Fiscal Years 2025/26 – 2026/27)		
Alameda Point Gym & Multipurpose Field	\$98,094	49
City Hall West	\$554,604	63
West End Library & Grounds	\$26,116	27
Bay Farm Library	\$142,750	37
Franklin Park & Recreation Center	\$138,626	73
Godfrey Park & Recreation Center	\$71,840	28
Krusi Park & Recreation Center	\$184,142	43
Leydecker Park & Recreation Center	\$189,503	98
Lincoln Park & Facilities	\$431,376	178
Littlejohn Park & Recreation Center	\$66,833	26
McKinley Park & Recreation Center	\$52,402	45
Tillman Park & Recreation Center	\$125,334	35
Main St Ferry Terminal & Bathroom	\$52,673	26
Total Phase Two	\$ 2,134,292	728
Phase Three (Fiscal Years 2027/28 – 2028/29)		
Bayport Park	\$29,267	28
City View Skate Park (Alameda Point)	\$41,354	12
Encinal Boat Ramp	\$344,135	21
Estuary Park	\$12,182	6

Facility / Building	Estimated Cost*	No. of Items
Grand St Boat Launch Bathroom & Ramp	\$139,517	38
Harrington Park & Restrooms	\$24,726	7
Jean Sweeney Park & Restrooms	\$45,460	15
Woodstock Park & Facilities	\$55,556	53
O'Club Site	\$220,422	105
Total Phase Three	\$912,619	285
Phase Four (Fiscal Years 2029/30 – 2030/31)		
Whale Park	\$5,112	6
Bohol Circle Immigrant Park	\$74,431	24
Saplane Lagoon Promenade	\$50,752	22
Chochenyo Park	\$123,390	19
Main Street Dog Park	\$112,613	9
Main Street Linear Park	\$243,526	11
Main Street Soccer Field	\$46,426	13
Marina Cove Waterfront Park	\$83,630	17
Marina Village Park	\$191,983	83
Rittler Park	\$12,316	7
Shoreline Park & Bathrooms 1	\$93,509	63
Towata Park	\$56,198	27
Seaplane Lagoon Ferry Terminal	\$65,668	11
Total Phase Four	\$1,159,553	312
Phase Five (Fiscal Years 2031/32 – 2032/33)		
Bill Osborne Model Airplane Field	\$52,570	12
Emergency Operations Center	\$46,945	22
Fire Station #1	\$31,763	13
Fire Station #2	\$76,487	54
Fire Station #3	\$111,709	21
Fire Station #4	\$151,660	59
Fire Training Center	\$170,164	107
Garage Central Repair	\$32,245	50
Maintenance Service Center & Garage	\$63,364	64
Police Station	\$173,215	93
Total Phase Five	\$910,121	388
Grand Total	\$7,562,089	2,884

IMPROVING ACCESSIBILITY IN THE RIGHT OF WAY

The City uses several methods to remove accessibility barriers in the public right-of-way. Some are annual programs that provide continual means of barrier removal while others vary based on outside influences such as permitted development and available grant funding. Existing annual programs in the City’s Capital Improvement Program include Sidewalk Repair, Signal Modernization, Pavement Management and Park Pathway Repair and Replacement.

Currently, work within these existing programs is prioritized based on condition with priority given to locations in and around schools, commercial districts, and public buildings. Work is also informed by public input and generally is organized into areas of geographic emphasis. Data gathered as part of this ADA evaluation will be used to further inform the prioritization of work within existing and new programs.

PAVEMENT MANAGEMENT

The City’s Pavement Management program seeks to maximize the condition of the 127 centerline miles of streets in Alameda with a combination of overlays, crack sealing, and pavement slurry seals. Pavement treatments are based on the existing pavement condition, age of pavement, and funding availability, typically treating approximately 4 miles of streets per year. Whenever a street is overlain with a new pavement, all curb ramps at each intersection are upgraded to current accessibility standards. Additionally, enhanced pavement striping including high visibility crosswalks, intersection daylighting, and new signage is implemented along High Injury Corridors to further improve pedestrian and bicycle safety.



Alameda Point’s Adaptive Reuse Area has new backbone infrastructure, including accessible sidewalks.



TRAFFIC SIGNAL MODERNIZATION

The City’s signalized intersections have varying levels of capabilities to support traffic operations. The Signal Modernization Project systematically upgrades traffic signal equipment. The project installs battery backup systems to keep traffic signals operational in the event of a power outage. In-pavement detection loops are replaced with video detection. Pedestrian signal heads are installed or replaced along with Accessible Pedestrian Signals. This work increases system reliability and improves performance, safety, and functionality for all intersections users.

SIDEWALK REPAIR

The City’s existing Sidewalk Repair program is guided by the Streets and Highway Code, which places responsibility of sidewalk condition with the adjacent property owner. The City, upon becoming aware of any sidewalk disrepair, is responsible for notifying the adjacent property owner and directing them to make the repair. Ultimately, if the property owner does not make the repair, the City can and then pass the cost of the repair to the property owner. Current practice is for the City to incur the cost and make repairs to sidewalk damaged by street trees.

Approved funding for these programs in the Fiscal Year 2023-25 biennial budget are as follows:

Annual Program	2024/25 Funding
Sidewalk Repair	\$1,000,000
Signal Modernization	\$750,000
Pavement Management	\$5,164,000
Total:	\$6,914,000

NEW CURB RAMP ACCESSIBILITY

A new Curb Ramp Accessibility program will be launched in 2024/25 with an initial \$300,000 investment of Community Development Block Grant (CDBG) funds. Each year, this program will competitively pursue use of the City’s allotment of funding for non-housing public improvements.

PRIORITY FRAMEWORK

Below is the priority framework for improving accessibility in the right of way. Referenced street classifications are from the City’s General Plan. Costs are included when using estimated quantities and unit costs makes sense. For example, a sidewalk tripping hazard can be removed with concrete cutting, which costs on average \$175 per cut. On the other hand, removing obstructions in the pedestrian path of travel is more difficult to estimate since each situation is so unique. An obstruction may be overgrown vegetation, which has a relatively low cost to remediate, or it may be a utility pole, which has a much higher cost to remediate.

HIGHEST PRIORITY	NEXT HIGHEST PRIORITY	THIRD HIGHEST PRIORITY
<ul style="list-style-type: none"> ■ Requests from persons with disabilities experiencing a barrier. ■ On Main Streets, around City Sites and Parks and in Socially Vulnerable Neighborhoods: <ul style="list-style-type: none"> • Sidewalk tripping hazards greater than ¼” that can be repaired with horizontal concrete cutting: \$565,000 • Sidewalks requiring removal and replacement because the vertical displacement is greater than 2” or the cross slope is greater than 5%: \$1,918,750 • Obstructions that make the sidewalk less than 4’ wide and 80” high ■ Missing curb ramps Citywide: \$270,000 ■ Repair/replace Island and Mecartney Dr Pathways: \$300,000 ■ Missing pedestrian signal heads and/or missing accessible pedestrian signals ■ Barrier removal will be in conjunction with planned improvements under the capital program 	<ul style="list-style-type: none"> ■ On Local Streets: <ul style="list-style-type: none"> • Tripping hazards greater than ¼” that can be repaired with horizontal concrete cutting: \$1,600,000 • Sidewalks requiring removal and replacement because the vertical displacement is greater than 2” or the cross slope is greater than 5% - \$3,523,750 • Obstructions that make the sidewalk less than 4’ wide and 80” high ■ Tripping hazards on pathways/trails greater than ¼” that can be repaired with horizontal cutting. ■ Curb ramps with an accessibility score of 1-2 Citywide: \$2,100,000 ■ Missing pedestrian signal countdown displays and accessible pedestrian signals missing an audible tone 	<ul style="list-style-type: none"> ■ On Neighborhood Connectors, Gateway, and Business Commercial Streets <ul style="list-style-type: none"> • Tripping hazards greater than ¼” that can be repaired with horizontal concrete cutting: \$754,000 • Sidewalks requiring removal and replacement because the vertical displacement is greater than 2” or the cross slope is greater than 5%: \$8,435,000 ■ Obstructions that make the sidewalk less than 4’ wide and 80” high ■ Pathways/trails requiring replacement because the vertical displacement is greater than 2”, the cross slope is greater than 5% and/or obstructions make the pathway less than 4’ wide and 80” high ■ Curb ramps with an accessibility score of 3-4 Citywide: \$11,000,000



Under the City’s current Sidewalk Repair Program, the adjacent property owner is responsible for making repairs to the sidewalk unless the damage was caused by a street tree. If a street tree caused the damage, the City makes the repair. Sidewalk work is costly and often unexpected, as property owners are generally unaware of their responsibility to make sidewalk repairs. Other challenges arise for property owners such as finding a suitable contractor, negotiating the work, getting a City permit, etc....To make it easier on property owners and to promote more sidewalk repair

work, the City will launch a new program, pending City Council approval, that offers property owners an option to have the City do the repairs and bill them for the work. This will streamline things for property owners and may reduce costs given the large volume of work under the City contract. City Council will provide direction on additional details of the program, including a financial hardship provision. Please note that while the ADA code requires sidewalk cross slopes to be less than 2%, the assessment of the City sidewalks found that over 85% of City sidewalks have a slope greater

than the standard. It would be economically infeasible to try to update all sidewalks. Therefore, to implement a logical and economically feasible plan towards compliance, and to implement maximum safety considerations, sidewalks with severe cross slopes greater than 5% will be addressed as a first order of priority. Transit stops, crosswalks and other controlled pedestrian crossings (ex. Rectangular Rapid Flashing Beacons) will be evaluated and added to the Transition Plan as part of a future update.

ENHANCING ACCESSIBILITY FOR CITY PROGRAMS AND SERVICES

The Self Evaluation identified several areas where the City can enhance accessibility in our communications, community-based programs and services, ADA grievance process, internal policies, and emergency management. Specific recommendations are made to address each finding. For example, the City should establish a policy to standardize investigations into all ADA complaints. And the City should regularly enlist people with a variety of disabilities to test the City website for accessibility and ease of

use. Implementation of the recommendations for more accessible City programs and services will occur over the next three years. Each recommendation and the fiscal year it will be addressed is included in the Transition Plan. The recommendations are not all-inclusive and may be adapted as new technologies and opportunities arise. More information about requirements and strategies can be found in the “ADA Best Practices Toolkit for State and Local Governments¹.”

¹ For the full toolkit, visit <https://www.ada.gov/pcatoolkit/toolkitmain.htm>

RECOMMENDATION	Addressed by (Fiscal Year)
COMMUNITY-BASED PROGRAMS AND ACTIVITIES	
Update policy for City hosted and/or sponsored Special Events to address recommended ADA provisions.	2026/27
Ensure all third-party sites where programs, activities and/or services are provided meet accessibility requirements. Work with Title II and Title III entities to ensure program accessibility.	2026/27
Develop a policy regarding ADA training for City staff. Training shall cover ADA compliant programming. Accommodation and working with and supporting participants with disabilities. Part-time Recreation staff shall also be trained in positive behavior support and behavior management for participants of all abilities. Consider the City’s need for an Inclusion Support Specialist in the Recreation and Parks Department.	2025/26
State in all City notifications (written/print, website, posters, etc.): “if you need an accommodation in order to participate in this program (wheelchair access, sign language interpreter, written materials in alternate format) please contact.....”	2025/26
Include on the City’s website and in other informational material details on the accessibility of the facility or facilities where programs take place. If an applicant or participant needs to be accommodated, it may require moving the program to an accessible location or the City employee must meet the resident at an accessible location within the variety of City facilities.	2025/26
Adopt a policy requiring the maintenance of accessible feature throughout the City’s facilities (e.g., maintenance of walkways, playground surfaces and elevators, placement of furniture and stored items in restrooms and door maneuvering clearances).	2025/26

RECOMMENDATION	Addressed by (Fiscal Year)
HOUSING	
Make housing applications and housing-related forms available to individuals with disabilities in alternative formats (large print, Braille, audiotape, computer disk, pictorial signage, etc.).	2024/25
Provide the reasonable accommodation policy in common spaces to ensure current tenants and future tenants are aware of the policy.	2024/25
PERSONNEL AND INTERNAL POLICIES, HUMAN RESOURCES	
Develop a policy for short-term and long-term/permanent disabilities.	2026/27
Develop a Workplace Violence policy in the Employee Policy Handbook	2024/25
Develop an ADA Grievance Procedure and Grievance form with an appeal process for Title I. The procedure shall be publicized in common areas that are accessible to all employees. The City shall maintain an ADA log.	
Develop a reasonable accommodation request policy, procedure, and request form. The policy shall be adopted by all departments for consistency. A request log shall be maintained including an internal request number, details of the request, and details regarding the resolution.	2026/27
Separate essential and non-essential job functions in City job descriptions.	2025/26
Job descriptions should add information on physical abilities and the frequency of when the physical ability is performed. Descriptions such as “occasionally”, “frequently”, “constantly” may be used to describe how often a task is performed. An example includes, “Frequently moves gym audio and visual equipment weighing up to 25 pounds across the facility for various meetings”.	2026/27
Ensure job descriptions include information on the work conditions, such as office or outdoor and travel requirements and its frequency.	2025/26
Add language for reasonable accommodations for specific job requirements listed in job descriptions. For example, if a job requires moving heavy objects, add “with or without reasonable accommodations upon request” at the end of the statement. It is also best practice to include language, that “supervisors may assign additional duties or requirements” so applicants know they can safely apply regardless of disability status.	2025/26
ADA COORDINATOR, NOTICE OF THE ADA’S PROVISIONS, GRIEVANCE PROCEDURES	
Post the name, office address and telephone number of the designated ADA Coordinator on the City’s website and on all accessibility related documents. The contact information shall be updated as necessary.	2024/25
Establish full time or nearly full time ADA Coordinator position who will oversee implementation of the recommendations in this plan, comply with and carry out the responsibilities of an ADA Coordinator, serve as liaison to the Commission on Persons with Disabilities and build relations with the disabled community and external advocacy groups.	2024/25
Establish a policy to standardize investigation into all complaints.	2024/25

RECOMMENDATION	Addressed by (Fiscal Year)
ADA COORDINATOR, NOTICE OF THE ADA’S PROVISIONS, GRIEVANCE PROCEDURES	
Establish a person who is responsible when the ADA coordinator is not available.	2024/25
Develop a public notice in accordance with the DOJ recommendation.	2024/25
Establish a policy to inform people of their protection of the ADA in public locations and in alternate formats	2024/25
<ul style="list-style-type: none"> ▪ Develop grievance/appeal forms to streamline the process. Provide the grievance procedure in alternate formats. Distribute grievance procedures to all department heads. Provide policy to update procedure and contact information as necessary. ▪ Distribute grievance procedures to all department heads. 	2024/25
GENERAL EFFECTIVE COMMUNICATIONS	
<p>Develop policy to include information on the provision of interpreter services:</p> <ul style="list-style-type: none"> ▪ time required to obtain interpreter. ▪ statement that a family member or companion of deaf persons shall not be requested to serve as sign language interpreter. ▪ statement that a person with a hearing impairment shall not be charged for the cost of the interpreter. ▪ statement of when a request for an interpreter is deny based on undue financial and administrative burden and that the individual with a disability will receive the benefits or services provided 	2025/26
Make arrangements with vendors so interpreters are available when needed.	2025/26
Develop policies and procedures to provide auxiliary aids and services. Train employees on the policy to follow when they receive a request for interpreter or auxiliary aids. Make the policy available to employees in all departments who face the public.	2025/26
Make arrangements with vendors to provide written materials in alternate formats (e.g., Braille large print, audio format, electronic format).	2025/26
Publish the City’s effective communication policy on the City’s website in an accessible format.	2025/26
Solicit feedback from the community who have different disabilities on the effectiveness of the communication policy.	2025/26
Where the City of Alameda communicates by telephone with applicants and beneficiaries, text telephones (TTYs) or equally effective telecommunications systems shall be used to communicate with individuals who are deaf or hard of hearing or have speech impairments.	2025/26
Provide written policies and training to employees who answer telephone calls to ensure calls made through a relay service are handled as quickly and effectively as other calls.	2025/26
WEBSITE ACCESSIBILITY	
Establish a policy that webpages will be accessible and create a process for implementation.	2025/26

RECOMMENDATION	Addressed by (Fiscal Year)
WEBSITE ACCESSIBILITY	
Develop a plan to make the web contents accessible and include specific steps and timeframes. Describe the plan on an accessible webpage that can be easily located from the home page. Encourage input on accessibility improvements including which pages should be given priority for change. Let the public know about the standards or guidelines being used to provide accessibility.	2025/26
Ensure staff and contractors are properly trained in web accessibility policy and procedures.	2025/26
Distribute the DOJ’s technical assistance document to all staff or contractor who create web content or post it.	2025/26
Provide a way for visitors to request accessible information or services and provide feedback about accessibility problems by posting a telephone number and email address on your home page. Establish a procedure to assure a quick response.	2025/26
Regularly enlist people with a variety of disabilities to test the webpage for accessibility and ease of use.	2025/26
Ensure alternative means are available for people with disabilities who are unable to use computers to access information, programs, and services that are normally provided on the webpage.	2025/26
9-1-1 AND EMERGENCY COMMUNICATIONS	
Ensure emergency services require and offer training for TTY at least as often as training for voice calls and at least every six months.	2024/25
Conduct unannounced tests to all call-taking positions using silent open line calls and calls transmitting TTY tones.	2024/25
Keep record of results of all test calls including date and time of each call, identification of the call-taking position, whether the call was silent/transmitted tones, whether the caller received a TTY response and the content of the response, the time elapsed and the number of rings from the initiation of the TTY call until the call taker response by TTY, and whether the call was processed according to the City’s standard operating procedures.	2024/25
EMERGENCY MANAGEMENT	
Ensure third party organizations contracted or arranged to help with emergency preparedness or management commit to compliance with the requirements of Title II of the ADA in formalized agreements.	2026/27
Adopt a written policy/procedure to seek and use input from people with different types of disabilities and organizations with expertise on disabilities issues regarding all phases of the emergency management plan and during emergency simulations.	2026/27
Adopt a written policy/procedures to ensure people with disabilities, including those who have mobility, vision, hearing, cognitive, and psychiatric disabilities, can safely self-evacuate or be evacuated by others.	2026/27

RECOMMENDATION	Addressed by (Fiscal Year)
EMERGENCY MANAGEMENT	
Publicize the voluntary database, including outreach to people with disabilities, and organizations with expertise on disability issues. Outreach should explain the purpose of the database and emphasize the confidential nature of the database.	2026/27
Adopt a written policy/procedure for shelter staff/volunteers to assist people who are blind or have low vision in understanding shelter layout, locating shelter amenities, and completing forms and other written materials.	2026/27
Adopt a written policy/procedure to provide effective communication during the emergency response for people who are deaf or have low vision.	2026/27
Adopt a written policy/procedure prioritizing people whose disabilities are aggravated by stress, a low-stimulation “stress-relief zone”, when space allows.	2026/27
<p>Adopt a written policy/procedure to ensure that people with disabilities:</p> <ul style="list-style-type: none"> ▪ are housed at “mass care” shelters unless they are medically fragile. ▪ who may need assistance with activities of daily living, even when their personal care aides may not be with them, are not turned away. ▪ are not housed in “special needs” and “medical” shelters just because they have a disability 	2026/27
Adopt a written policy/procedure to ensure that shelter staff/volunteers receive training with site-specific instructions for providing people with disabilities access to all services, activities, and programs at the specific shelter they are operating.	2026/27
Adopt a written policy/procedure TTYs at all emergency shelters, this may be accomplished by providing Wi-Fi capability at shelters.	2026/27
<p>Adopt a written policy/procedure to ensure that people with disabilities who use service animals at emergency shelters:</p> <ul style="list-style-type: none"> ▪ are not separated from their service animals and have full access to shelter programs, services, and activities, even if pets are normally prohibited in specific areas of the shelters. ▪ are provided with food, water, receptacles and plastic bags for the disposal of service animal waste. ▪ can take their animals outside for relief without unnecessary delays for screening upon re-entry 	2026/27
<p>Adopt a written policy/procedure to ensure people with disabilities that use medical equipment, require medication, have dietary restrictions, and/or use a mobility device:</p> <ul style="list-style-type: none"> ▪ are provided with a way to keep medications refrigerated. ▪ when possible, are notified of the location of shelters providing electricity and refrigeration. ▪ can request and receive durable medical equipment and medication. ▪ are provided with immediate access to food and refrigerated medications, as applicable. ▪ are allowed to request cots or beds, modifications to cots or beds, securement of cots or beds to allow safe transfer to a wheelchair, and placement of cots or beds in specific locations when needed. 	2026/27
Adopt a written policy/procedure to ensure programs relocated from a damaged facility on a temporary or permanent basis remain accessible to people with disabilities.	2026/27

BUREAU VERITAS CERTIFICATION

Bureau Veritas has completed a Comprehensive Accessibility Evaluation of the City of Alameda properties in Alameda County, California, in accordance with the requirements of 28 CFR Part 35, the 2010 ADA Design Standards for Accessible Design, and the State of California Building Code sections related to accessibility.

The conclusions and recommendations presented in this report are based on the evaluations of properties under the jurisdiction of the City of Alameda, associated documentation related to the properties, and input from the City of Alameda staff.

Accessibility evaluations were conducted by Bureau Veritas Project Architects and Project Engineers during site visits to individual properties. Project Architects' and Engineers' observations were made during site visits conducted in 2022 - 2023. Cost estimates for barrier removal are planning level cost estimates based on Bureau Veritas's experience with similar properties.

The assessments were performed at the Client's request using methods and procedures consistent with good commercial and customary practice for assessing compliance with the Title II provisions of the Americans with Disabilities Act (ADA), including the requirements of 28 CFR Part 35, and applicable state requirements. Accessibility barriers in areas which were not readily accessible, and/or may not have been visible, may exist. Individual facility reports describe property conditions at the time that the observations and research were conducted. The individual facility reports are not an engineering evaluation of physical conditions. The Self-Evaluation did not include engineering evaluations or engineering calculations to determine the adequacy of the park or facility's original design or to determine engineered cost estimates.

The opinions Bureau Veritas expresses in this report were formed utilizing the degree of skill and care ordinarily exercised by any prudent architect or engineer in the same community under

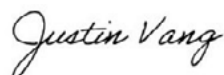
similar circumstances. Bureau Veritas assumes no responsibility or liability for the accuracy of the information contained in this report, which has been obtained from the Client or the Client's representatives, from other interested parties, or from the public domain. The conclusions presented represent Bureau Veritas's professional judgment based on information obtained during the course of this assignment. The conclusions presented are based on the data provided, observations made, and conditions that existed specifically on the date of the assessments of individual properties.

Bureau Veritas certifies that Bureau Veritas has no undisclosed interest in the subject property, Bureau Veritas' relationship with the Client is at arms-length, and that Bureau Veritas' employment and compensation are not contingent upon the findings or estimated costs to remedy any deficiencies.

This report has been prepared on behalf of and exclusively for the use of the City of Alameda for the purposes stated herein. The purpose for which this report shall be used shall be limited to the use as stated in the contract between the client and Bureau Veritas.

This report, or any of the information contained therein, is not for the use or benefit of, nor may it be relied upon by any other person or entity, for any purpose without the advance written consent of Bureau Veritas. Any reuse or distribution without such consent shall be at the client's or recipient's sole risk, without liability to Bureau Veritas. If you have any questions regarding this report, please contact Michael Cunniff, Senior Project Manager, (800) 766-0660 x 7296214. BV Project #:154465.22R000-PGM.413, 154465.22R000-00A.206, 154465.22R000-00A.428

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