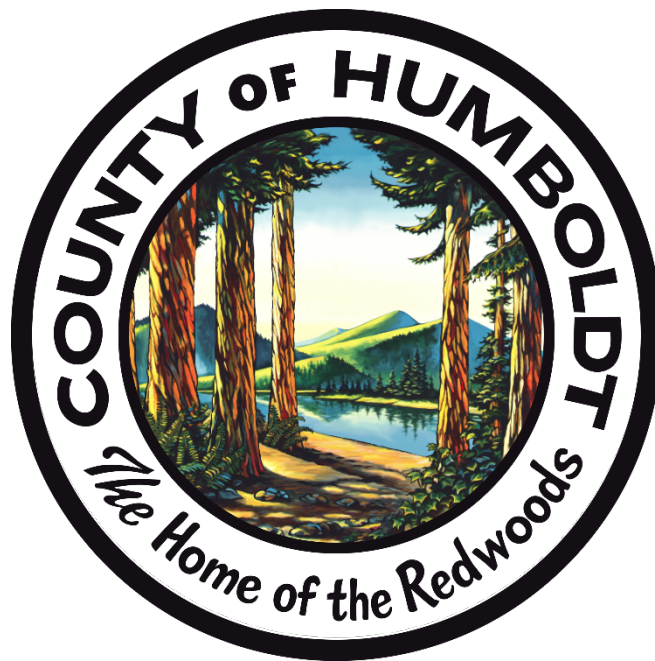


# Humboldt County ADA Self-Evaluation and Compliance Plan



ADA Compliance Plan  
9-30-20

## Table of Contents

<b>Executive Summary</b> .....	1
<b>Accessibility of County Programs, Services and Activities</b> .....	2
<b>Plan Organization</b> .....	4
<b>ADA Acronyms</b> .....	4
<b>1.0 Introduction</b> .....	5
<b>1.1 Legislative Mandate</b> .....	5
<b>1.2 Accessible Programs and Facilities</b> .....	6
<b>1.3 Discrimination and Accessibility</b> .....	6
<b>1.4 ADA Self-Evaluations and Transition Plan</b> .....	7
<b>1.5 Federal and State Accessibility Standards</b> .....	8
<b>1.6 Public Outreach for the Plan</b> .....	8
<b>2.0 Humboldt County Self-Evaluation</b> .....	8
<b>2.1 Programmatic Modifications</b> .....	9
<b>2.2 Required and Recommended Actions</b> .....	9
<b>2.2.a. Accessible and Adaptive Equipment</b> .....	9
<b>2.2.b. Customer Service</b> .....	10
<b>2.2.c. Notice Requirements</b> .....	12
<b>2.2.d. Printed Information</b> .....	13
<b>2.2.e. Audiovisual or Televised Information</b> .....	14
<b>2.2.f. Website</b> .....	15
<b>2.2.g. Telephones and Other Communications Devices</b> .....	16
<b>2.2.h. Training and Staffing</b> .....	17
<b>2.2.i. Program Eligibility and Admission</b> .....	18
<b>2.2.j. Public Meetings</b> .....	19
<b>2.2.k. Employment Practices</b> .....	20
<b>2.2.l. Transportation Services</b> .....	21
<b>2.2.m. Use of Consultants for Delivering Program Services</b> .....	21
<b>2.2.n. Emergency Evacuation Planning and Procedures</b> .....	22
<b>2.2.o. Facilities</b> .....	23
<b>2.2.p. Special Events and Private Events on Public Properties</b> .....	24
<b>3.0 Humboldt County Compliance Plan</b> .....	25
<b>3.1 Schedule for Facility Improvements</b> .....	25
<b>3.2 Accessibility Standards</b> .....	25
<b>3.3 Building and Site Evaluations</b> .....	26
<b>3.4 Barrier Categorization</b> .....	26
<b>3.5 Phasing Schedule for Building and Site Facility Improvements</b> .....	26
<b>4.0 Barrier Removal Considerations for Plan Implementation</b> .....	27
<b>4.1 Triggers for Barrier Removal</b> .....	27
<b>4.2 Program Accessibility</b> .....	27
<b>4.3 Alterations</b> .....	28
<b>4.4 Safe Harbor Provisions</b> .....	29
<b>4.5 Undue Burden</b> .....	30
<b>4.6 Construction Tolerances</b> .....	30
<b>4.7 Historic Buildings and Facilities</b> .....	30
<b>5.0 ADA Coordinator, Notice Policy, and Grievance Procedure</b> .....	31

<b>5.1 ADA Coordinator Roles and Responsibilities</b> .....	31
<b>5.2 Notice Under the ADA</b> .....	31
<b>Policy on Nondiscrimination on the Basis of Disability</b> .....	31
<b>5.3 ADA Grievance Procedure</b> .....	32
<b>Grievance Procedure Under the Americans with Disabilities Act</b> .....	32
<b>6.0 Definitions</b> .....	33
<b>7.0 Resources</b> .....	38
<b>7.1 Guidance Documents and Organizations</b> .....	38
<b>7.2 Guidance Documents and Articles—Web Design</b> .....	39
<b>7.3 Guidance Documents and Articles Creating Accessible Documents</b> ...	39
<b>7.4 Guidance Documents—Historic Properties</b> .....	40
<b>7.5 Guidance Documents and Organizations—Emergency Preparedness     Planning for People with Access and Functional Needs</b> .....	40
<b>7.6 Federal, State, and Local Laws, Standards, and Ordinances</b> .....	41
<b>8.0 ADA Barrier Analysis – Summary Report</b> .....	43
<b>8.1 ADA Barriers in the Built Environment</b> .....	43
<b>8.2 Accessibility Standards</b> .....	43
<b>8.3 Facility Assessments</b> .....	43
<b>8.4 Buildings Barrier Report</b> .....	44
<b>9.0 Footnotes</b> .....	44

**Appendix A: Schedule of Facility Improvements**  
**Appendix B: Public Outreach**

## **Executive Summary**

The Americans with Disabilities Act (ADA) of 1990 provides comprehensive civil rights protections that prohibits discrimination against individuals with disabilities in all areas of public life, including jobs, schools, transportation, and all public and private places that are open to the general public. The purpose of the law is to make sure that people with disabilities have the same rights and opportunities as everyone else. The ADA gives civil rights protections to individuals with disabilities similar to those provided to individuals on the basis of race, color, sex, national origin, age, and religion. It guarantees equal opportunity for individuals with disabilities in public accommodations, employment, transportation, state and local government services, and telecommunications. A primary goal of the ADA is to ensure equal participation in public life for all Americans with disabilities. Title II of the ADA covers the accessibility of programs, services and activities of public entities, such as those offered by the County of Humboldt.

The County of Humboldt is subject to Title II of the ADA, which addresses all programs, services and activities offered to the public, and Title I which addresses employment activities. Exceptions to this rule are present when this requirement would result in a fundamental alteration in the nature of the program or result in undue financial and administrative burden. To fulfill the ADA mandates under Title II, the County of Humboldt has conducted a Self-Evaluation.

Humboldt County's Americans with Disabilities Act (ADA) Self-Evaluation and ADA Compliance Plan (from here on called "the Plan") supports the county in fulfilling the requirements set forth in Title II of the ADA. The ADA states that public entities must reasonably modify policies, practices, and procedures to protect against discrimination towards people with disabilities. The Plan assists Humboldt County in identifying policy, program, and architectural barriers to accessibility and provides guidance in developing solutions to remove architectural barriers and ease access to services for all individuals.

The ADA Compliance Plan for County Maintained Roads is a subset of the County's overall ADA Compliance Plan and applies only to the roads in the County Maintained Road System. The ADA Compliance Plan for County Maintained Roads provides for the completion of improvements set forth in Section K of the Department of Justice Consent Decree that remain uncompleted as of the date that the Consent Decree expired, March 13, 2020. This includes, but is not limited to curb ramps, access to County facilities from the nearest accessible parking stall and from the nearest bus stop within a 0.5 mile walking path of County programs, services and activities; and provides a protocol to address requests to remove barriers to access on County maintained roads. The ADA Compliance Plan for County Maintained Roads is a separate document.

## **ADA Coordination & Management**

As required by the ADA, Humboldt County designated an ADA Coordinator to oversee the implementation of the Plan. Karen Clower, in the ADA Compliance Team of the Humboldt County Administrative Office, will serve as the ADA Coordinator. The ADA Coordinator is responsible for the coordination and development of Humboldt County's efforts to comply with Title II of the ADA and for investigating any complaints related to accessibility. The ADA Coordinator is also responsible for overseeing the county's efforts to comply with all other applicable state and local accessibility requirements as related to county programs, services and activities.

## **Involving People with Disabilities**

Humboldt County is required to provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the development of the Plan by submitting comments. In order to satisfy this requirement and to gain the perspective of individuals with disabilities, the county held an online open comment period that started on **October 9, 2020**, and closed **November 9, 2020**, where members of the public were invited to comment on Humboldt County's draft ADA Compliance Plan and Self-Evaluation. As part of the implementation of the Plan, Humboldt County intends to seek ongoing feedback of accessibility practices and operations on a regular basis. The ADA Coordinator will work with any interested residents on the best means to receive ongoing input and feedback. Contact information for the current ADA Coordinator is as follows:

ADA Coordinator  
825 Fifth Street, Suite 112, Eureka, CA 95501  
Phone: (844) 365 – 0352  
California Relay Service: 711  
Email: [ada@co.humboldt.ca.us](mailto:ada@co.humboldt.ca.us)

## **Accessibility of County Programs, Services and Activities**

Title II of the ADA emphasizes the accessibility of programs, services, and activities. The Plan addresses these issues by providing recommendations based on a comprehensive review of county practices, policies, plans, guidelines, and construction specifications. This process included every department, division, and program that provides services to the public. Based on this review, recommendations were developed for removing programmatic and policy barriers, and ensuring the accessibility of county programs, services, and activities.

## **Accessibility of County Facilities**

The Plan is used to document barriers to accessibility throughout Humboldt County's programs, services and activities. The documented barriers to accessibility identify existing facility conditions that deviate from the most stringent ADA standards found in code sections for state and federal standards of new construction. The Plan outlines code deviations for each barrier. The first requirement related to facility accessibility is to identify architectural barriers in public facilities that limit the accessibility of programs, services or activities to individuals with disabilities. Humboldt County facilities evaluated included:

- County-owned parks
- County-owned buildings
- County programs housed in leased facilities
- Polling stations
- Emergency shelter locations

The Plan is the result of a detailed evaluation of all county facilities where programs, services and activities are available to the public. The county is currently remediating architectural barriers through construction projects. In addition, written policy and procedure modifications related to providing accessible programs, services and activities, which include the removal of programmatic barriers, are being undertaken as part of the Plan.

Title II states that interim steps to provide accessibility must be provided if the Plan will take more than one year to thoroughly implement; a 20-year timeframe for architectural barrier removal in county facilities was identified. The Plan provides a framework for the continuous improvement of accessibility barriers for individuals with qualified disabilities. Other measures to reduce architectural and programmatic barriers will be explored and implemented to improve access for the public while the county implements major architectural barrier removal projects at all county facilities.

## **Moving Forward**

The Plan provides the foundation for removing barriers at facilities and programs offered by Humboldt County. The current status of the county's programs, services and activities in county owned and leased facilities have been inventoried as part of the Plan. This inventory provides recommendations for the removal of programmatic and architectural barriers.

## **Acknowledgements**

The Humboldt County ADA Compliance Plan and Self Evaluation was produced and developed with the help of a variety of Humboldt County staff and stakeholders.

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## Plan Organization

**Section 1 – Introduction** provides an overview of the planning process and the legislative mandate governing the process.

**Section 2 – Self-Evaluation** details the outcomes of the evaluation of county policies, services, programs, and activities.

**Section 3 – Humboldt County ADA Compliance Plan** describes the evaluation of architectural barriers at county facilities and schedules for remediation.

**Section 4 – Barrier Removal Considerations for Plan Implementation** provides an overview of the topics the county should consider and address when implementing barrier removal efforts.

**Section 5 – ADA Coordinator, Notice Policy, and Complaint Procedure** includes an overview of the ADA Coordinator position and examples of policies for notice and grievance procedures.

**Section 6 – Definitions** commonly used terms in the ADA Compliance Plan and the ADA.

**Section 7 – Resources** contains a directory of disability organizations, guidelines, and resources for addressing the recommendations included in the Plan.

## ADA Acronyms

The following are acronyms used prevalently by accessibility experts in California and around the country.

ABA – Architectural Barriers Act

ADA – Americans with Disabilities Act

ADAAG – ADA Accessibility Guidelines

ASL – American Sign Language

CA MUTCD – California Manual on Uniform Traffic Control Devices

CBC – California Building Standards Code

CFR – Code of Federal Regulations

CRS – California Relay Service or Telephone Relay Service or 711

DOJ – U.S. Department of Justice

DSA – California Division of the State Architect

ECP – Effective Communication Policy, ADA Compliance

ISA – International Symbol of Accessibility

OPDMD – Other Power-Driven Mobility Device

TDD – Telecommunications Display Device

TRS – Telephone Relay Service, California Relay Service or 711

TTY – Text Telephone

VRI – Video Remote Interpreting Services

## 1.0 Introduction

The Americans with Disabilities Act (ADA) became law in 1990. The ADA is a civil rights law that prohibits discrimination against individuals with disabilities in all areas of public life, including jobs, schools, transportation, and all public and private places that are open to the general public. The ADA is in place to ensure inclusion for the estimated 57 million Americans with disabilities. It requires that all programs offered by public entities be accessible to and usable by individuals with disabilities when the programs, services and activities are viewed in their entirety. This requirement frequently necessitates removal of architectural (physical access) barriers unless other appropriate program solutions for accessibility are available. Title II of the ADA states that a public entity must modify its policies, practices, and procedures in a reasonable manner to avoid discrimination against people with qualified disabilities. The ADA Self-Evaluation and Compliance Plan will support Humboldt County in fulfilling the requirements set forth in Title II of the ADA. The Plan identifies accessibility barriers in county policies, programs, services, activities, and facilities and guides the county in developing barrier removal solutions.<sup>1</sup> Additionally, the Plan:

- Identifies architectural barriers (physical obstacles) in Humboldt County facilities that limit the accessibility of programs, services or activities to individuals with disabilities
- Describes the methods that will be used to make facilities accessible
- Specifies the schedule for taking necessary steps to achieve compliance with Title II, and identifies steps that will be taken during each year of the Plan
- Indicates the officials responsible for the implementation of the Plan
- Estimates the costs for mitigation solutions

## 1.1 Legislative Mandate

The Americans with Disabilities Act (ADA) was passed in 1990, but its history stems from the Civil Rights Movement of the 1960s. The first legislative protection from discrimination for people with disabilities was Section 504 of the Rehabilitation Act of 1973. This act did not protect individuals with disabilities from discrimination in many employment and public accommodation situations and as such, the ADA was passed. The ADA provides protection against discrimination in employment and situations of publicly provided goods and services for people with disabilities. Civil rights protections outlined in the ADA are similar to protections provided to individuals on the basis of race, color, sex, origin, age, religion and other bases. Major updates to the ADA were completed in 2008, with the Americans with Disabilities Act Amendments Act (ADAAA) as well as the updated regulations from 2010 (Title II and Title III) and 2013 (Title I).

The Department of Justice (DOJ) and the Attorney General of the United States are responsible for publishing ADA regulations. There are five Titles of ADA, which split up the act into discrimination protection by different categories of public life. The five Titles of ADA are based on topics as follows:

- Title 1: Employment Situations
- Title 2: Services and Programs of State and Local Governments
- Title 3: Public Accommodations
- Title 4: Telecommunications Services



## Title 5: Miscellaneous Provisions

Title II covers regulations for programs, services and activities of public entities. Title II prohibits discrimination and exclusions for individuals with qualified disabilities from being allowed the benefits of programs, services or activities offered by a public entity.<sup>2</sup> Public entities, such as Humboldt County, may not:

- Deny the opportunity for individuals with disabilities to participate as members of advisory boards or commissions
- Deny individuals with disabilities the opportunity to participate in programs, services or activities offered to others
- Compel individuals with disabilities to participate in separate or different activities
- Deny access to those who require a service animal in any public area of a county facility
- Determine locations for facilities that exclude or discriminate against individuals with disabilities.

### 1.2 Accessible Programs and Facilities

Humboldt County is responsible for the provision of accessible programs and facilities provided by the county. Humboldt County is required to operate each program, service, or activity so that the program, service, or activity, when viewed in its entirety, is readily accessible to and usable by individuals with disabilities. The principal of program accessibility is fundamental to Title II, or “the principle that individuals with disabilities must be provided an equally effective opportunity to participate in or benefit from a public entity's aids, benefits, and services.”<sup>3</sup> Public entities are not required to make each and every facility accessible but are obligated to maintain accessible facilities in working order and provide accessible facilities for services for individuals with disabilities. The Plan is used to document access barriers to county programs, services and activities and the remediation of identified barriers. Documented access barriers identify existing facility conditions that deviate from current state and federal ADA standards. For each barrier, the Plan outlines the code deviations and requirements from the ADA Standards, accessibility standards in the California Building Code (CBC) for the facilities, and the Outdoor Developed Areas Guidelines for parks and trails.

Exceptions are described for temporary disruptions in both the ADA<sup>4</sup> and the California Building Code (CBC).<sup>5</sup> These “Undue Burdens” refers to any modification that would create undue financial or administrative burdens or that would fundamentally alter the nature of operation of the program. Whether a particular accommodation will impose an “undue burden” is determined on a case-by-case basis. If a particular modification is determined to cause an “undue burden” to the County of Humboldt, the county shall identify another modification that would not pose such an undue burden to ensure that individuals with disabilities receive the benefits or services provided by the county.

### 1.3 Discrimination and Accessibility

The elimination of discrimination that Title II works to provide requires the provision of physical accessibility and program accessibility.

Physical accessibility requires:

- That a facility be barrier-free where public programs, services and activities are provided

- Architectural or physical barriers include any obstacles that restrict or prevent entrance to a facility or use of a facility.

Program accessibility requires:

- That individuals with disabilities are provided an equal and effective opportunity to benefit from or participate in programs, services and activities provided by Humboldt County
- That all policies, practices and procedures permit people with disabilities to participate in programs and access information
- The availability of advertisement, eligibility, testing, evaluation, participation, physical access, auxiliary aids, auxiliary services, policies and communication

Program accessibility may be accomplished through:

- Structural or non-structural methods, including;
  - Alteration of existing facilities
  - Acquisition of equipment redesign
  - Assignment of aids to beneficiaries
  - Provision of services at alternate sites
  - Alterations to service delivery that will not result in a fundamental alteration in the nature of the program

Humboldt County is required to prioritize the method of accomplishing program accessibility that results in the most integrated setting appropriate to encourage interaction between all users, those with and without disabilities.

## **1.4 ADA Self-Evaluations and Compliance Plans**

Title II requires that public entities undertake two initiatives: a self-evaluation of programs, services, and activities<sup>6</sup>, and the development of a plan to identify and schedule remediation of architectural barriers.<sup>7</sup>

The self-evaluation process identifies barriers in Humboldt County programs, services, and activities and recommends corrective actions. As part of its self-evaluation process, Humboldt County must:

- identify county programs, services and activities
- review the policies, practices, and procedures that govern the administration of the county's programs, services and activities
- provide opportunity for public comment on this process
- produce and make the self-evaluation report available to the public
- remove barriers from programs, services and activities

The compliance plan process identifies architectural barriers in facilities and within the public right-of-way. The Plan schedules the removal of those barriers over time. The county's Plan must include:

- a list of accessibility barriers in county facilities
- a detailed outline of feasible methods to remove accessibility barriers
- a schedule for removing accessibility barriers
- provide opportunity for public comment on the county's ADA Compliance Plan
- the name of the individual responsible for the county's ADA compliance implementation

Beginning in 2016, the county conducted a self-evaluation of its programs, services and activities and physical accessibility surveys of county-owned and leased buildings, parks and curb ramps. Based on the findings from these efforts, county staff are actively working to address barriers and track remediation progress. Humboldt County is looking at the most appropriate models to address the removal of architectural barriers, including staffing models. Section 2 of the Plan addresses the self-evaluation, and Section 3 contains Humboldt County's Plan.

## **1.5 Federal and State Accessibility Standards**

In addition to federal ADA standards, public entities are required to comply with various complementary state statutes and consider legal precedents and best practices regarding accessibility. Humboldt County's technical mandates on facility accessibility are from state and federal design standards. Wherever possible, this Plan attempts to define, clarify, and distinguish overlapping standards, legal precedents, and best practices. Proposed guidelines have been developed by the Federal Access Board.<sup>8</sup>

## **1.6 Public Outreach for the Plan**

As part of the self-evaluation and ADA compliance planning process, Humboldt County is required to solicit and accept comments from the public. This includes individuals with disabilities as well as the organizations that represent them. Many people with disabilities have unique perspectives on a public entity's programs, services and activities and its accessibility.

For this planning process, Humboldt County included a draft self-evaluation and Public Review Draft of the Plan posted on Humboldt County's website for public comment on **October 9, 2020**. Hard copies were made available at the Humboldt County Clerk of the Board's Office in Eureka. Comments acquired from the online and physical postings are included in Appendix B: Public Outreach.

The Humboldt County Board of Supervisors will be presented with the Plan for acceptance and adoption.

## **2.0 Humboldt County Self-Evaluation**

Programs, services and activities offered by Humboldt County to the public must be accessible. As part of the self-evaluation process, county policies and practices were reviewed to ensure that they do not adversely affect the full participation of individuals with disabilities. The Self-Evaluation is an analysis of all programs, services and activities to identify and make recommendations to correct policies and practices that are inconsistent with Title II requirements. According to Title II-8.2000, the Self-Evaluation shall contain:

- Identification of all of Humboldt County's programs, services and activities

- Review of all policies, practices and procedures that govern the administration of the county's programs, services and activities

Title II of ADA requires that covered entities with more than 50 employees conduct a Self-Evaluation. This Self-Evaluation is to be vetted with stakeholders and retained for 3 years. During this time, it is to be available to the public upon request. The rationale for revising a Self-Evaluation often consists of several factors, which may include and is not limited to the following:

- Program changes within the county
- Impact of case law on disability civil rights
- Impact of federal legislation and regulations
- Impact of state legislation and regulations
- Changes in staffing
- Increased awareness of ADA
- Improved understating of the Self-Evaluation process
  - Recognition of the value of Self-Evaluation to:
    - Serve as a basis for documenting a good faith effort
    - Function as a work plan to track progress and accountability
    - Enhance communication with stakeholders
    - Increase staff awareness and enhance customer service

This Self-Evaluation is a living document and should serve as a record for new staff, giving information and context regarding actions taken by the county to increase accessibility to date.

## **2.1 Programmatic Modifications**

The ADA Coordinator will follow-up on a scheduled basis with each department to review the recommendations contained in the self-evaluation. In unique departmental situations where a policy, program, service, activity or procedure creates a barrier to accessibility, the ADA Coordinator will correspond with the program manager or designee to address the removal of the barrier in the most reasonable and accommodating legal manner.

## **2.2 Required and Recommended Actions**

Each category of self-evaluation finding(s) is included in Title II requirements. Categories are described below along with required and recommended actions. Required actions outline requirements that appear in Title II for each of the defined categories. Recommended actions include strategies that the ADA Compliance Team and Consultant Team have considered and are thought to have a positive effect towards the application of countywide compliance. These actions are guidelines and may be adapted as different opportunities and strategies come about.<sup>9</sup>

### **2.2.a. Accessible and Adaptive Equipment**

Adaptive aids are devices, controls, appliances or other items that make it possible for individuals with disabilities to improve their ability to function independently and participate in

programs, services and activities offered by the county. Examples of adaptive aids may include anything from a pen, notepad and clipboard to accessible computer stations, and others.<sup>10</sup>

## **Required Actions**

- 1) Provide and maintain, in working order, accessible equipment for people with disabilities when equipment is provided to the public.<sup>11</sup>
- 2) Provide appropriate auxiliary aids and services in a timely manner, giving primary consideration to the requests of individuals with disabilities as outlined in the Humboldt County Effective Communication Policy.<sup>12</sup>

## **Findings**

All employees who interact with the public are required to take the county's mandatory Effective Communication Training and CRS (California Relay Service) training. The county has adopted, distributed to departments and posted on its website an Effective Communication Policy. In addition, the county has secured a vendor list of products and services meeting effective communication accommodation needs and has distributed this to departments and posted on its internal intranet site making it available to all staff. The county may also provide adaptive aids such as accessible kiosks, counter space, pen, paper, and clipboards where and when applicable.

## **Recommended Actions**

Identify potential barriers to accessibility by reviewing county-provided equipment for use by the public. This may include computers, copy machines, telephones, workstations and other technologies.

- Ensure accessible electronic equipment is in an accessible location and at an accessible height or easily adjustable to an accessible height.
- Collaborate with community and organizations that serve people with disabilities for the development and maintenance of a resource list of assistive technologies and equipment offered by and throughout the county.
- Establish a toolkit of adaptive aids and resources for staff who interact with the public. The toolkit should include both internal and contracted services.
- When purchasing equipment, include accessibility as a purchase criterion. This may include evaluating furniture and material purchases for compatibility with a wide range of disabilities. Adjustable or modifiable furniture, furnishings, office systems and other items can be used to accommodate a variety of physical and ergonomic needs.
- Consult with disability organizations outside of the community and individuals with disabilities for equipment that has worked well in existing applications.

### **2.2.b. Customer Service**

One of the primary services of most county departments is in-person interaction with the public. To meet accessibility standards for these interactions, county staff should realize the formal and informal procedures used for accommodating individuals with disabilities. These may include

appropriate responses to requests for program modifications and accommodation guidelines for service animals.

## Required Actions

- 1) Make appropriate modifications to regular practices to accommodate the needs of individuals with disabilities when providing customer service.<sup>13</sup>
- 2) Continue the policy of not charging an additional fee to people requesting a program modification due to their disability.<sup>13</sup>
- 3) Continue the policy of allowing service animals in county facilities.<sup>14</sup>
- 4) Continue to publish the Humboldt County's grievance procedures that provides fair and prompt resolution of accessibility-related complaints.<sup>15</sup>

## Findings

Accommodation requests by the public are recorded. Providing accessible programs is an obligation of the county and the county does not require and is not allowed to ask individuals with disabilities to incur costs of providing accessible services.

## Recommended Actions

- Continue to make appropriate modifications to regular practices to accommodate the needs of individuals with qualified disabilities while providing customer service.
- Develop criteria and a process for determining reasonable modifications to provide program accessibility. This may include acquisition or redesign of equipment, assignment of aids to individuals with disabilities, and provision of services at alternative sites that are accessible. The development approach should include:
  - Ensuring the public has access to information and contacts regarding procedures for making requests for reasonable modifications.
  - Ensuring department staff members are knowledgeable about assisting individuals and individuals acting on the behalf of individuals with disabilities with accessibility requests.
  - Ensuring staff are knowledgeable about requests that can be fulfilled immediately and other requests that require additional planning efforts by the county to be fulfilled.
  - Assessing the composition and needs of the population and take necessary steps to improve communication and outreach to increase effective participation in county programs, services and activities.
  - Departments offering programs, services or activities should meet with requestors to identify aspects of the program, service or activity that limits participation by individuals with disabilities.
  - Keep programs up to date through increased community involvement and partnerships with organizations that offer services to individuals with disabilities

- Ensuring employees and the public are knowledgeable about the ADA Grievance Procedure offered by Humboldt County.
- Continue to track the outcomes of all accessibility requests.
- Educate the public about the county's formal process for changing standard operating procedures when needed to fulfill modification and/or accommodation requests.
- Maintain Service Animal Policy guidelines and procedures for the inclusion of service animals in county facilities.<sup>16</sup>

### **2.2.c. Notice Requirements**

ADA Title II Technical Assistance Manual §8.4000 and §35.106 require the county to provide information on Title II's requirements to applicants, participants, beneficiaries, and other interested persons. The notice shall explain Title II's applicability to the public entity's programs, services and activities. A public entity shall provide such information as the head of the public entity determines to be necessary to apprise individuals of Title II's prohibitions against discrimination. The County Administrative Officer (CAO) shall determine the most effective way of notifying the public about their rights and the county's responsibilities under ADA. This information should be provided whenever necessary and at minimum on an annual basis.<sup>17</sup>

### **Required Actions**

- 1) Provide public notice regarding the county's commitment to providing accessible services.<sup>18</sup>
- 2) Ensure the public notice provides interested people with the ability to obtain information about the existence and location of accessible services, programs, activities, and facilities.<sup>19</sup>

### **Findings**

The county has a nondiscrimination statement that includes individuals with disabilities. The nondiscrimination statement includes information about how to reach the county's ADA Coordinator and is posted on the county's website and placed in all county departments in a location that maximizes public exposure. Some, but not all, departments reported knowing the procedure to file a disability complaint and that they notify the public about how and with whom to file a disability complaint.

### **Recommended Actions**

- Continue to provide notice of availability of program modifications including alternative formats of materials and auxiliary aids. On notices, include contact information for the ADA Coordinator and other county staff who can assist those requiring modifications. Note that a 72-hour notice is required.
- Notify the public that meetings, hearings, and conferences will be held in accessible locations and that adaptive aids such as listening devices will be provided upon request to participants with disabilities.
- Include nondiscrimination notices in county publications with language similar to:

- *The County of Humboldt is committed to providing equal access to all county programs, services and activities through the provision of accommodations for individuals with disabilities as required under the Americans with Disabilities Act (ADA). With 72 hours prior notice, a request for a reasonable modification can be made. Please contact [Department Name] at [phone number] or by email [department email] or the ADA Coordinator at toll free 844-365-0352 or by email at [ada@co.humboldt.ca.us](mailto:ada@co.humboldt.ca.us).*
- As applicable, republish or rebroadcast the notice periodically, by radio, television, newspaper, mailing or other form of notice.
- Increase staff awareness of public locations of the statement of nondiscrimination and the procedure for filing disability discrimination complaints.
- Continue outreach to individuals with disabilities and organizations for information and ideas about possible modifications related to the accessibility of programs, services, and activities.

## 2.2.d. Printed Information

In order to meet the ADA's communication standards, county departments must be able to provide information, when requested, in alternative formats such as easy-to-understand language, Braille, large-format prints, audio recordings, computer programs, or other formats.<sup>20</sup>

## Required Actions

- 1) Provide alternative formats to printed information when requested with 72-hours' notice.<sup>21</sup>
- 2) Address requests for alternative formats for lengthy documents on an individual basis.<sup>21</sup>
- 3) Ensure costs for alternative formats are not assigned to an individual with a disability making the request.<sup>22</sup>
- 4) Provide assistance upon request filling out forms or when alternative formats are unavailable or infeasible.<sup>22</sup>
- 5) Provide printed information in simple language for people with cognitive disabilities upon request.<sup>21</sup>

## Findings

The county's Effective Communication Policy is posted on the county website (<https://humboldt.gov.org/DocumentCenter/View/64069/Adopted-Effective-Communication-Policy?bidId=>). The Effective Communication Policy (ECP) has information about providing alternative formats to printed information and requirements for producing printed information in alternative formats for individuals with qualified disabilities. The ECP aims to ensure that requests for modifications are handled in a uniform and consistent manner. All requests for alternative formats shall be handled on an individual basis at no additional costs to an individual with a qualified disability requesting the alternative format. All departments who produce printed information made available to the public reported that they provided printed materials in alternative formats upon request.



The county has a list of pre-approved interpreters, readers, and open purchase orders for ASL and Braille Services. The county provides documents and publications in alternative media or in accessible formats as follows:

Type of Information	Accessible PDF File	Computer Disk/Flash Drive	Braille	Large Print	Qualified Readers
Agendas	X	X	X	X	X
Meeting Packets	X	X	X	X	X
County Reports	X	X	X	X	X

## Recommended Actions

- Include a notice on public materials printed by the county similar to the following:
  - *The County of Humboldt is committed to providing equal access to all county programs, services and activities through the provision of accommodations for individuals with disabilities as required under the Americans with Disabilities Act (ADA). With 72 hours prior notice, a request for a reasonable modification can be made. Please contact [Department Name] at [phone number] or by email [department email] or the ADA Coordinator at toll free 844-365-0352 or by email at ada@co.humboldt.ca.us.*
- Include photos or images of individuals with disabilities when images of individuals are included in printed publications highlighting programs, services, or activities offered by the county.
- Provide training to staff on the production of printed information in alternative formats to help with the consistent handling of requests.
- Develop and implement templates for producing accessible county materials consistent with Humboldt County branding.
- Provide accessible permitting, registration or reservation systems in a variety of formats.

### 2.2.e. Audiovisual or Televised Information

Televised and audiovisual information is a means for displaying public information through presentations produced by county departments. All televised and audiovisual information must be accessible to individuals with qualified disabilities. As more and more communications occur remotely via the internet, it is increasingly important that all communication tools maintain accessibility as technology changes and advances.<sup>23</sup>

## Required Actions

- 1) Provide alternative formats to audiovisual presentations produced by or for the county upon request with 72 hours' notice.<sup>24</sup>

## Findings

The county uses closed captioning for televised public meetings.

## Recommended Actions

- Review county-produced and provided presentations, videos, meeting records, and other information for barriers to accessibility. Develop solutions corresponding to accessibility barriers.<sup>25</sup>
- Encourage presenters to read slides and describe graphics when presenting visual presentations. This allows hearing and visually impaired individuals to benefit from the presentation.
- Included photos or images of individuals with disabilities when images of individuals are included in visual presentations.
- Provide alternatives to audio presentations for county programs and for audiovisual presentations produced by the county to ensure that individuals with impairments can benefit from these presentations.

### 2.2.f. Website

As people increasingly rely on the internet as a primary source of information regarding programs, services, activities and facilities, the county's website (<https://humboldt.gov/>) takes on increased importance as a communications tool. Providing public access to county publications online is an effective means of reaching individuals with disabilities.<sup>26</sup> Accessibility standards for electronic information and information technology covered by Section 508 of the Rehabilitation Act amendments of 1998 have set forth technical and functional performance criteria necessary for such technology to be accessible. Section 508 is recommended to be applied to state and local public entities because its technical and functional performance criteria listed for federal public entities aligns well with state and local requirements.<sup>27</sup>

## Required Actions

- 1) Ensure that the county's online communication with people with disabilities is as effective as other communications with the public.<sup>28</sup>

## Findings

Humboldt County has a Website Accessibility Policy. The county website provides an AudioEye Ally Toolbar for people with visual impairments. The county has a website accessibility coordinator and uses a third-party vendor who reviews and repairs, as needed, the county website for accessibility issues including documents posted. In addition, the county requires annual Website Accessibility trainings for web authors and editors. When images are used, Humboldt County includes photos, graphics, scanned images, or image maps and makes sure to include alternate tags and/or long descriptions for each.

## Recommended Actions

- Continue to monitor the accessibility of county web pages through web accessibility analysis to meet and/or exceed Section 508 of the Rehabilitation Act guidelines for accessibility of electronic information.
- Acquire technical resources or staffing expertise for the creation of accessible documents for posting on the county's website. Continue to provide training to county staff members in creating accessible PDF or other electronic files for posting on departmental web pages.
- Include the county's statement regarding accessible locations and the availability of auxiliary aids upon request on the website.
- Designate the County Administrative Office as the authority to provide standards and oversight for outsourcing vendors, contracting to create web pages, and for departmental employees who post their own documents. The goal of one department overseeing standards for web page creation leads to consistent and accessible web pages.

### 2.2.g. Telephones and Other Communications Devices

Provision of alternative communication technologies such as text telephones (TTY), telecommunication display devices (TDDs), telephone relay services (TRS) also known as California Relay Service (CRS), or Video Remote Interpreting Services (VRI) is required for conducting communications with the public.<sup>29</sup>

### Required Actions

- 1) Ensure that staff members are proficient in the use of alternative communication technologies such as CRS, or are able to direct members of the public to knowledgeable staff.<sup>30</sup>
- 2) Ensure that county publications that list phone numbers also include information on how people who are deaf or who have hearing loss or speech disorders can communicate with departments by phone using services such as TTY, TDD, or TRS.<sup>31</sup>

### Findings

All staff are required to have the California Relay Service (CRS or TRS) training and Effective Communication Training as part of their new hire trainings and repeat this training every 4 years. Video Remote Interpreting Services (VRI) for communicating with people with hearing and/or speech impairment is included in the county's Effective Communication Policy, as is information regarding the CRS or TRS.

### Recommended Actions

- Maintain current Video Remote Interpreting Services (VRI) for communications when required with individuals who are deaf, have hearing loss, or have speech disorders. A live interpreter may still be required in many situations.

- Publications that list phone numbers should also include information on how individuals with hearing or speech impairments can communicate with departments by CRS.

## **2.2.h. Training and Staffing**

As a part of the county's ongoing staff development and training, the incorporation of disabilities awareness, standards, and resources are encouraged for all employees. This includes in person, online and telephone interactions. The county shall be knowledgeable in providing accessible programs, services, and activities to the public and ensure that access to programs, services and activities are maintained in working order.

### **Required Actions**

- 1) Ensure that county staff members are knowledgeable about providing accessible programs, services, and activities to the public, and the importance of maintaining accessible facilities in working order.<sup>32</sup>

### **Findings**

All county employees are required to take ADA Training online as part of their new hire trainings and repeat this training every 4 years. Standard countywide accessibility guidelines, procedures, and trainings have not yet been developed for areas including:

- Standardized, appropriate language for outreach and written material
- General evacuation procedures for buildings

### **Recommended Actions**

- Provide all county staff with ongoing awareness and sensitivity training.
- Continue to provide training to county staff members who have contact with the public about how to provide reasonable accommodations and use assistive devices.
- Ensure that customer service training includes information about communicating with and providing modifications for individuals with a variety of disabilities.
- Include program-specific adaptations, assistive devices and modifications in an accessibility policy manual for each department.
- Develop a comprehensive disability access-training program. Educate all county staff about their responsibilities under ADA. The county's ADA Coordinator and department supervisors should be responsible for ensuring that staff members receive training. Reference materials that address reasonable accommodations should be included in this training. Staff members who have extensive public contact should receive additional training about the process of providing modifications and assistive devices. Ensure training includes information about types of responses to various disabilities and program or disability-specific adaptations, assistive devices and modifications.
- Develop standard guidelines for training materials. These guidelines should include standard language that appropriately describes the county's policy on inclusion and non-discrimination, and staff members should receive training in using guidelines effectively.
- Train all county staff with respect to accessibility compliance to maintain the accessibility of each facility including the fundamentals of building codes.

- Offer basic American Sign Language (ASL) communication training to staff members who wish to learn ASL. This training should emphasize basic communication and should not be confused as a substitute for using qualified ASL interpreters when requested or required.
- Provide county staff members with training in general building evacuation procedures for assisting individuals with hearing, speech, visual, mobility, and learning disabilities in an emergency.

### **2.2.i. Program Eligibility and Admission**

The public must be able to access all programs, services, and activities, regardless of disability. Admission criteria, ability to complete forms and participation in interviews must be available to all members of the public by providing reasonable accommodations unless such modification, accommodation or alteration would result in a fundamental alteration to the nature of a program, service or activity or would impose undue financial or administrative burdens.<sup>33</sup>

### **Required Actions**

- 1) Provide reasonable modifications to program participants with disabilities to include them in regular programs to the maximum extent possible.<sup>34</sup>
- 2) Modify standard policies, practices, or procedures to avoid discrimination unless the modification would fundamentally alter the nature of the program, result in an undue financial or administrative burden, or create a hazardous situation for the participant or others.<sup>34</sup>
- 3) Ensure that when the county determines it is necessary to exclude or limit the participation of people with disabilities to ensure the safe operation of programs or services, those determinations are made based on real risks, not on perceived risk, speculation, stereotypes, or generalizations.<sup>34</sup>
- 4) When interviews are required for program participation, meetings shall be held in accessible locations and alternative formats or auxiliary aids shall be provided upon request.

### **Findings**

Humboldt County has no limitations or ratio requirements for the number of people with disabilities who can participate in their programs, services or activities. A few departments require an interview prior to participation in county programs, services or activities for all applicants.

### **Recommended Actions**

- Aim to ensure program accessibility by increasing outreach to people with disabilities. Inform the public of possible modifications that can be provided to programs, services, and activities to make them accessible.
- A non-discrimination statement should be included on application or registration forms.

- Evaluate each request for reasonable accommodation on an individual basis.

## 2.2.j. Public Meetings

Public agencies regularly administer public meetings for a variety of different topics. The main objective of public meetings is to obtain and solicit information on public issues that are important to the county. The facilities and sites housing these meetings are an important consideration in the satisfaction of ADA requirements.

### Required Actions

- 1) Provide agendas and other meeting materials in alternative formats upon request.<sup>35</sup>
- 2) Provide assistive listening devices available for public meetings where the sound at the meeting is amplified.<sup>36</sup>
- 3) Public meetings shall be held in accessible facilities in order to accommodate the participation of people with mobility disabilities. An accessible location includes, but is not limited to, the following: accessible parking, accessible path-of-travel, accessible restrooms, and directional signage.

### Findings

Some departments hold public meetings. Humboldt County provides documents and publications in alternative media or accessible format as follows:

Type of Information	Accessible PDF File	Computer Disk/Flash Drive	Braille	Large Print	Qualified Readers
Agendas	X	X	X	X	X
Meeting Packets	X	X	X	X	X
County Reports	X	X	X	X	X

\*X indicates auxiliary aids currently provided by Humboldt County and available

### Recommended Actions

- Continue to schedule public meetings at accessible locations.
- American Sign Language (ASL) interpreters, readers or adaptive equipment shall be provided when requested for meetings, interviews and conferences with 72-hour notice.
- Prepare a list of accessible meeting spaces to facilitate the scheduling of meetings and/or the relocation of meetings upon request.
- Display a notice on meeting agendas indicating the availability of accessibility modifications.

- Provide agendas and other meeting materials in alternative formats, when requested with 72-hour notice.
- Maintain assistive listening devices available at public meetings.
- Maintain a list of on-call American Sign Language interpreters who may be brought to meetings to assist individuals with hearing impairments.
- Include the following notice at all public meetings:
  - *The County of Humboldt is committed to providing equal access to all county programs, services and activities through the provision of accommodations for individuals with disabilities as required under the Americans with Disabilities Act (ADA). With 72 hours prior notice, a request for reasonable accommodation or modification can be made. Please contact [Department Name] at [phone number] or by email [department email] or the ADA Coordinator at toll free 844-365-0352 or by email at ada@co.humboldt.ca.us.*
- Provide guidance in the layout of the room, including sign-in table and refreshments table, to ensure that these features are accessible.
- Develop a checklist for creating accessible meetings and selecting accessible meeting spaces and make the list available to all county departments and programs who conduct public meetings. Guidelines should include examples of the types of modification requests made, room layout, restrooms location, and other meeting elements to ensure accessibility of all features.
- Move disability-related agenda items to the front of meetings when possible. Some disabled individuals may find it hard to stay late at public meetings for a variety of reasons.

## **2.2.k. Employment Practices**

Public agencies are required to maintain employment practices.

### **Required Actions**

- 1) Implement employment practices that align with accessibility requirements and needs.

### **Findings**

Humboldt County has established and published a Policy of Nondiscrimination, as follows:

- *"Humboldt County is an equal opportunity employer. Humboldt County makes employment decisions without regard to race, religion or religious creed, color, age, sex, sexual orientation, national origin, ancestry, marital status, medical condition, mental or physical disability, military service, or any other classification protected by federal, state, or local laws or ordinances. Reasonable accommodation may be made in the testing procedure as well as the work site. If you need accommodation for an exam due to a disability, please contact the Human Resources office as soon as possible."*

County Merit System Rules provides direction to facilitate efficient and economical services to the public and to provide for a fair and just system of personnel management in county government (<https://humboldt.gov/2494/Personnel-Documents>).

Subject Matter Review of employment applications are provided to the Subject Matter Expert (SME) with only their work experience and supplemental questions (no identifying information is provided at this level). The SME is a person with comprehensive knowledge of the duties and responsibilities necessary to perform a specific job. The overall role and responsibility of the SME is to provide a recommendation to the Hiring Panel of the most qualified candidates based on their subject matter expertise. Each employment advertisement placed on NEOGOV has language referencing the county's Policy of Non-Discrimination and Employment Eligibility contained in the county's EEOC policy.

## **Recommended Actions**

- Maintain monitoring of practices related to nondiscrimination requirements.

### **2.2.I. Transportation Services**

Many public agencies provide transportation services. The public accommodation standards for transportation services are set forth by the Federal Transit Administration.<sup>37</sup>

## **Required Actions**

- 1) Make reasonable modifications in policies, practices, or procedures for transportation programs when the modifications are necessary to avoid discrimination on the basis of disability or to provide program accessibility to services.<sup>38</sup>

## **Findings**

Some departments reported providing transportation services to the public.

## **Recommended Actions**

- Proactively ensure accessibility through the periodic review of transportation programs.
- Develop strategies for modification to transportation programs as appropriate.
- Ensure that accessible vehicles provided by county services are available for transportation.

### **2.2.m. Use of Consultants for Delivering Program Services**

Many public agencies rely on the use of consultants, contractors, licensees, and other entities for the delivery of services. These entities are considered an extension of county services and are required to adhere to the same ADA regulations as the county.

## **Required Actions**

- 1) Ensure that contractors, licensees, consultants, and other entities providing or delivering services for the county adhere to the same ADA regulations as the county.<sup>40</sup>



## Findings

Some departments reported the use of consultants for delivering program services.

## Recommended Actions

- Ensure consultants, contractors, licensees, and other entities are aware of the obligation to make county programs, services, and activities accessible.
- Monitor public programs and activities provided by consultants, contractors, licensees, and other entities to ensure continued accessibility.
- Provide a checklist and other means of information to inform consultants, contractors, licensees, and other entities providing public services of their responsibilities for accessibility under ADA.
- Ensure consultants to each department are aware of their obligations to facilitate participation of individuals with disabilities programs.

### 2.2.n. Emergency Evacuation Planning and Procedures

All county departments require established emergency evacuation procedures to safely evacuate individuals with disabilities who may need special assistance in an emergency.<sup>41</sup>

The county is responsible for ensuring that staff are aware of and trained to implement these procedures if required during an emergency. Components of an emergency that have great impact on individuals with disabilities include:

- Notification of the emergency
- Evacuation during the emergency and related transportation needs
- Access to required possessions such as medications, mobility devices, and service animals
- Access to emergency power
- Access to other information related to the emergency

## Required Actions

- 1) Include strategies for people with disabilities in various types of emergency situations when developing guidelines and a plan for emergency evacuations.<sup>42</sup>
- 2) Train staff to safely evacuate people with disabilities in various types of emergency situations when developing guidelines and a plan for emergency evacuations.<sup>42</sup>

## Findings

The county needs to establish emergency evacuation procedures related to individuals with disabilities.

## Recommended Actions

- Develop guidelines and a plan for the evacuation of individuals with disabilities in various types of emergency situations. These plans should:
  - Address what to do when an alarm is triggered
  - Establish meeting places for assistance and evacuation vehicles including wheelchairs
  - Provide direction on what to do if assistance is unavailable
  - Establish floor captains responsible for assisting with evacuation procedures related to disabled individuals.
- Study specific suggestions for evacuation plans and procedures found throughout the US Access Board website (<https://www.ada.gov/emergencyprepguide.htm>) and the Emergency Procedures for Employees with Disabilities in Office Occupancies document published by FEMA and the US Fire Administration.
- Train county staff related to emergency evacuation procedures with periodic announced and unannounced evacuation drills.
- Review existing procedures dealing with emergencies to ensure that individuals with disabilities can be alerted and that they can alert emergency services providers. Update existing procedures as required.
- Allow departments that routinely provide emergency services priority for receiving equipment to accommodate alternative format communication and other services for disabled individuals.
- Collaborate with disability organizations to explore the use of alternative technologies such as audible exit signage for orientation and directional assistance.
- Provide training for public safety personnel to enable basic ASL communications if emergency conditions or situations arise. This training could be provided to disaster response personnel as needed in response situations.
- Provide ASL interpreters at emergency response facilities, as needed. Form a pool of interpreters as a resource that may be utilized if needed.
- Take necessary steps to ensure emergency teams are aware of individuals with disabilities in their communities who may require specialized assistance in an emergency event.
- Test the emergency response plan by enlisting disabled individuals to role-play different aspects of emergency and response situations.

### 2.2.o. Facilities

County facilities are required to be accessible to people with various types of disabilities. Structural barrier identification in county facilities and public right-of-way is a required element of accessibility. Public right-of-way compliance planning is covered under a separate document. Recommendations throughout this subsection highlight county facilities overall on general basis. Section 3 and Section 4 of the Plan addresses physical aspects of facility accessibility on a case-by-case basis.

## Required Actions

- 1) Ensure that interested people can obtain information regarding the existence and location of accessible facilities and elements within facilities.

## Findings

The county has performed assessments of all county facilities that offer a program, service or activity to the public. Barriers to access have been identified throughout reports for each facility assessed. Lease renewals including amendments to extend the term of the lease will require an established timeline for ADA barrier removal to be complete. New leases for locations that the county does not occupy will require the facility to be fully accessible prior to the county taking occupancy.<sup>43</sup>

## Recommended Actions

- Include information about county-owned facility accessibility on department publications and on department websites.
  - Include information about the accessibility of non-county facilities hosting county programs, services, or activities as well.
  - Include information about the accessibility of county-owned facilities that are leased to other entities.
- Record facility accessibility requests. Analyze accessibility requests on a periodic basis for any issues that can be addressed or problems that may be solved in a proactive manner.
- Train maintenance and other staff on maintaining accessibility throughout facilities.

### 2.2.p. Special Events and Private Events on Public Properties

Events that transpire on public property should be accessible to disabled individuals. When the county rents out or allows use of county-owned properties to third parties for special events, the responsibility for maintaining the environment as accessible is deferred, temporarily, to the tenant or user of the property.

## Required Actions

- 1) Maintain county facilities in an accessible order to help ensure the accessibility of events held by public and private organizations.<sup>44</sup>

## Findings

The county provides an opportunity for private organizations to utilize county-owned facilities for special events. Humboldt County ensures both private entities and staff are aware of their obligations to facilitate participation of individuals with disabilities during these special events.

## Recommended Actions

- In situations where private organizations sponsor events in county facilities, ensure the organizer is informed about applicable ADA requirements

- This may include path of travel requirements and other necessary information
- Provide a checklist and information during the application process to inform organizers of their responsibilities under ADA.

### **3.0 Humboldt County Compliance Plan**

Title II of the ADA required public entities that maintain and have responsibility or authority over facilities, streets, sidewalks, and other public use areas develop an ADA Transition Plan. The Transition Plan was to detail how local jurisdictions would perform removal of ADA barriers to access. A typical plan was a 20-year plan. The time for a transition plan has lapsed. The county is dedicated to performing required removal of ADA barriers to access and is committed to designing an ADA Compliance Plan and an ADA Compliance Plan for County Maintained Roads for this effort. The ADA Compliance Plan (the Plan) works to modify inaccessible facilities into accessible environments. The ADA Compliance Plan for County Maintained Roads is a separate document.

The identification of access barriers within the built environment is a component of the ADA Compliance Plan planning process. The Plan must:

- Identify barriers to program access
- Identify specific barrier removal action or actions
- Identify a schedule for barrier removal
- Identify county employees responsible for ensuring barrier removal

Humboldt County's ADA Compliance Plan incorporates accessibility barriers at facilities and sites owned, leased and/or operated by the county. The public right-of-way compliance plan is covered under a separate document.

### **3.1 Schedule for Facility Improvements**

Humboldt County's Plan proposes a 20-year time period for barrier removal at county facilities. The 20-year plan is a fluid document and subject to change based on lease negotiations, relocation of programs and availability of funding. This timeframe also allows the county required flexibility in the compliance process and allows for new opportunities to be explored. A copy of the 20-year time period planned for barrier removal was included in the public input document and the most current plan can be made available upon request. The ADA Coordinator will be responsible for overseeing barrier removal. The remediation of barriers is an ongoing process and the schedule may be modified for community requests, petitions, changes in county programs, services, or activities. Humboldt County's schedule for facility improvements are included in Appendix A: Schedule for Facility Improvements.

### **3.2 Accessibility Standards**

Evaluations made under the scope of this report fell under the requirements of the 2016 and 2019 California Building Code the ADA and the 2010 ADA Standards Federal regulations governing its production are regulated under Section 28 of the Code of Federal Regulations, Part 35.

### 3.3 Building and Site Evaluations

Areas of public use in county buildings and sites were evaluated under the requirements of the 2016 and 2019 California Building Code Part 2, Volume 1, Chapter 11B the ADA and the 2010 ADA Standards for Accessible Design.<sup>45</sup> A catalogue of assessed barriers will be provided upon request, provided, categorized by facility in the following pages and includes review of the following elements:

- Built-in elements
- Doors and gates
- Drinking fountains
- Public restrooms
- Signage
- Elevators
- Telephones
- Outdoor developed areas
- Parking areas
- Picnic areas
- Path of travel elements\*
- Play areas
- Specific program elements\*\*

\*Paths of travel include elements starting from public way, parking and access to public transportation to the building entrance related to publicly available program resources.

\*\*Program barriers include items unique to the activities of the program provided: bathing facilities where locker rooms are provided for public recreation activities, eating areas where food is served at public events, food cooking and preparation surfaces where cooking classes are provided, bookshelves in libraries, etc.

The facilities were observed, categorized and documented by the assessment team and evaluated by a group of consulting experts related to each respective assessment topic.

### 3.4 Barrier Categorization

Access barrier removal is categorized relative to the ADA regulation standards. Basic access to site, programs, and the building are provided through the previously noted elements. Alternatives to building element modification may be considered on a case-by-case basis. Categories are as follows:

- Category 1 - Barriers that affect the building entrance and pedestrian route to public programs (e.g., parking, walkways, ramps, stairs, doors).
- Category 2 - Barriers that affect the accessibility of program use areas (e.g., trails, service counters, conference room, public office, and public restrooms).
- Category 3 - Barriers that affect access to public amenities (e.g., drinking fountain, telephone, site furniture, vending machines).

### 3.5 Phasing Schedule for Building and Site Facility Improvements

This plan provides a 20-year period of prioritized barrier removal from Humboldt County facilities. Systematic removal provides for continuous improvement and maximized effect toward the goal of access compliance for all public programs within the county. Priorities are based on the limitations of timeframe and budget. Title II of the ADA Federal Code of Regulations provides an outline for prioritization and execution of the Plan relative to buildings, site and access revisions.

Policies and procedural modifications may remedy access to some programs. Where applicable, the county will make such modifications. When building and site revision is required, the elements are noted in this plan in the form of the construction and maintenance projects described.

A spreadsheet has been produced for quick reference related to required revisions and maintenance to facilities and programs described. The first three years of the plan will focus on continued barrier removal and/or relocation of programs specifically addressed in the Department of Justice Consent Decree. After the first three years of evaluation, the programs and elements falling within the “Safe Harbor” provisions under section 4 of the Plan the county will address the inventory of barriers as they are removed under this provision and revised the schedule as necessary.

The Plan is a living document and will be adapted as necessary to reflect the barrier list and schedule currently held by the county. Facility GIS data will be updated along with the Plan. Tracking tools will reflect items removed from the barriers list. The Excel workbook and related GIS data will be maintained by the county’s ADA Coordinator. Current status of remediation can be provided by the ADA Coordinator at: [ADA@co.humboldt.ca.us](mailto:ADA@co.humboldt.ca.us).

Not all barriers required the same level of mitigation effort, and barrier removal is organized by owned and leased facilities. The 20-year plan is attached as a separate document.

## **4.0 Barrier Removal Considerations for Plan Implementation**

Two strategies will be used to accomplish barrier removal by Humboldt County. Policy and procedure modifications will remove barriers to programs, services, and activities. Maintenance and construction projects will remove structural barriers at facilities and in the public right-of-way. Title II requires public entities to operate programs, services, and activities so that each program, service, or activity is readily accessible to and usable by individuals with disabilities. This requirement does not necessitate the county to:

- Make each and every one of its existing facilities accessible to and usable by individuals with disabilities
- Take an action that results in a fundamental alteration of a program, service, or activity
- Take an action that would threaten or destroy the historic significance of a historic property.

### **4.1. Triggers for Barrier Removal**

The county’s ADA Coordinator or designees are responsible for ensuring barrier removal. Barriers must be removed under two conditions: the provision of access to programs, services and activities and when a facility is altered for renovations or other changes.

### **4.2 Program Accessibility**

Program accessibility means that public entities must ensure individuals with disabilities are not excluded from programs, services, or activities because of existing buildings being inaccessible. In other words, programs, services, and activities must be accessible and remain accessible to and usable by individuals with disabilities.

### 4.3 Alterations

Architectural barriers are required to be removed by Humboldt County when a facility is altered. An alteration is defined as “a change in a building or facility that affects or could affect the usability of a building or facility or portion thereof.”<sup>46</sup> Alteration projects include tenant improvements or remodels, renovations, rehabilitation, reconstruction, restoration, resurfacing of paths and vehicular ways, and structural changes.

Maintenance items are not considered alterations if conducted in accordance with the county’s normal maintenance requirements. Maintenance items may include roofing improvements, painting, changes to mechanical, electrical and plumbing (MEP) systems. Other similar projects are not considered alterations unless they affect the fundamental nature of the facility including the facility’s usability.

Alterations performed solely for the purpose of barrier removal do not trigger additional path of travel improvement requirements.<sup>47</sup> Opportunities for accessibility improvements by alterations are allowed by the CBC and the ADA. Standards application is determined on an individual project basis by the scope of the project and associated elements of altered spaces. Altered elements or spaces are required to comply with the code and do not require an accessible path, unless the alteration is at a facility’s location that includes a primary function of the facility.

For areas of primary facility function, the ADA requires existing barriers related to the path of travel to the primary function area be removed to the maximum technically feasible extent. Path of travel elements include:

- Restrooms
- Drinking fountains
- Doors
- Route
- Telephones
- Other clearance requirements

A disproportionate level of expense related to the alteration for elements to be accessible is considered to be in excess of 20% of the construction cost. In other words, Humboldt County and other public agencies are not required to spend more than 20% of the initial estimated construction cost for ADA path of travel improvements. Path of travel improvements should be completed according to the following ranking:

- 1) Accessible entrance
- 2) Accessible route to altered area
- 3) A minimum of one accessible restroom for each gender or a single gender-neutral restroom
- 4) Accessible telephones
- 5) Accessible drinking fountains
- 6) Additional accessible elements such as parking and storage

The 20% excess to original construction costs does not apply if construction costs are greater than the current valuation threshold. The valuation threshold increases on an annual basis. The 2020 valuation threshold is \$170,466.00. For comparison, the 2019 valuation threshold was \$166,157.00. If the construction budget exceeds the valuation threshold, all elements related to path of travel that support the renovated area are required to be made accessible regardless of cost. Section 7.6 includes additional information about California’s valuation threshold.

There are situations when the county is not required to remove barriers identified within their owned facilities as part of the Plan, including:

- Where programmatic modifications are possible to provide an equivalent experience
- Where nearby and equivalent accessible features are available
- Where there are no public programs or activities provided at the project's portion of the site
- When safe harbor conditions are met (defined below)

In alteration or new construction projects, Humboldt County must incorporate standards of accessibility to the maximum extent feasible.<sup>48</sup> Technically infeasible alterations are possible and may result in some accessibility efforts being unlikely to be accomplished due to existing physical and site constraints.<sup>49</sup> Events of technical infeasibility require public agencies to comply with feasible accessibility standards to the fullest extent.<sup>50</sup>

#### 4.4 Safe Harbor Provisions

The ADA Standards of 2010 introduced the concept of safe harbor.<sup>51</sup> This exception allows facilities that were built prior to March 15, 2012, and in compliance with the 1991 ADA Standards to remain in their existing configuration (complying with 1991 standards) until structural alterations are undertaken.<sup>52</sup>

From Title II regulations:

- *This safe harbor is not a blanket exemption for facilities. If a public entity undertakes an alteration to a primary function area, only the required elements of a path of travel to that area that already comply with the 1991 Standards are subject to the safe harbor. If a public entity undertakes an alteration to a primary function area and the required elements of a path of travel to the altered area do not comply with the 1991 Standards, then the public entity must bring those elements into compliance with the 2010 Standards.*<sup>53</sup>

Elements that fall under the safe harbor would otherwise have to be modified under:

- Program access requirements
- Readily achievable barrier removal requirements for public accommodation places
- Path of travel requirements for any alteration that affects the usability of a primary functional area offering programs, services, or activities

If required path of travel elements had been improved through construction projects using specifications in the 1991 ADA Standards of the Uniform Federal Accessibility Standards before March 15, 2012, a public entity is not required to retrofit these elements to meet changes in the 2010 ADA Standards solely due to a primary function area being served by that path of travel.<sup>54</sup> The annually adjusted valuation threshold in California remains in place for required path of travel upgrades regardless of safe harbor provisions.<sup>55</sup>

The 2010 ADA Standards identify structural elements not falling under the safe harbor provision. These elements are not eligible for safe harbor provisions because technical and scoping specifications for these elements were not addressed in the 1991 ADA Standards but added as supplemental requirements prior to 2010.<sup>56</sup> These structural elements include:



- Residential facilities dwelling units
- Amusement rides
- Recreational boating facilities
- Exercise machines and equipment
- Fishing piers and platforms
- Golf facilities
- Miniature golf facilities
- Play areas
- Saunas and steam rooms
- Swimming pools, wading pools, spas
- Shooting facilities with firing positions
- Team or player seating
- Accessible route to bowling lanes
- Accessible route in court sports facilities

## 4.5 Undue Burden

Humboldt County is not required to take action that is demonstrable to result in:

- A fundamental alteration of programs, services, or activities
- A hazardous condition resulting in a direct threat to a program participant or other individuals
- An undue financial and administrative burden

Determination of undue financial or administrative burden can only be made under specified circumstances and procedures. This determination carries with it the obligation of taking other actions that would ensure, to the fullest extent, that individuals with disabilities receive the benefits of the program, service, or activity.

## 4.6 Construction Tolerances

Constructed features have the possibility of small variances between standards outlined in the ADA and CBC and actual construction, which is acknowledged by the codes. The CBC states that all dimensions are subject to conventional industry tolerances, except where a specific minimum and maximum end points are given to a tolerable range for a specific feature.<sup>57</sup>

Conventional construction industry tolerances must be applied on a project- and case-specific basis. Predetermined guidelines for construction tolerances may unnecessarily encourage contractors and other individuals to deviate from access regulations. Conventional construction industry tolerances include field conditions and necessary consequences of particular manufacturing processes. The design phases for projects should anticipate construction industry tolerances as these are not applied to design work.

In some cases, barrier reports available through Humboldt County do not reflect the application of construction industry tolerances. Humboldt County will evaluate the application of construction industry tolerances on a case-specific basis after alterations or other barrier removal is completed.

## 4.7 Historic Buildings and Facilities

Alterations to qualified historic buildings or facilities must be in compliance with the 2010 ADA Standards and the CBC.<sup>58</sup> Qualified historic properties are those that are listed in or eligible for listing in the National Register of Historic Places or that are designated to be historic under state or local laws.

Barrier removals at Humboldt County historic properties are to be done in full compliance with alteration standards for other types of buildings to the maximum feasible extent. If standards would threaten or destroy historical significance, the following alternative standards, providing a minimal level of access, can be used:

- Require accessible routes only at one site access point
- Allow steeper ramps than would be ordinarily permitted
- Permit an accessible entrance to be one not used by the general public
- Require only one accessible toilet, that is gender neutral
- Require accessible routes only on the level of the accessible entrance
- Locate displays and written information where visible by seated individuals

## **5.0 ADA Coordinator, Notice Policy, and Grievance Procedure**

The ADA requires a state or local government entity that employs 50 or more people to designate an employee or employees responsible for coordinating its efforts to comply with and carry out its responsibilities under Title II, give notice of the ADA's requirements, and establish a grievance procedure.<sup>59</sup> Humboldt County has designated an ADA Coordinator responsible for these compliance efforts and has established a grievance procedure.

### **5.1 ADA Coordinator Roles and Responsibilities**

The ADA Coordinator is responsible for organizing and communicating the county's efforts to comply with and fulfill its responsibilities under Title II of the ADA, as well as all other applicable state and federal laws. Responsibilities also include investigating complaints where the county has engaged in any action prohibited by Title II. The ADA explicitly states that the name, office address, and telephone number of the county's ADA Coordinator must be provided to all interested individuals.

### **5.2 Notice Under the ADA**

Title II regulations require the county to inform the public of the rights and protections provided by the ADA for access to public programs, services, and activities. It is the obligation of the County Administrative Officer to determine the most effective way of providing notice to the public about their rights and the county's responsibilities under the ADA. Publishing and publicizing the ADA notice is not a one-time requirement. Information should be provided on an ongoing basis and updated whenever necessary.

## **Policy on Nondiscrimination on the Basis of Disability**

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 ("ADA"), **Humboldt County, California** will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

*Employment:* The **County** does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under Title I of the Americans with Disabilities Act (ADA).

*Effective Communication:* The **County** will generally, upon request, provide appropriate aids and services leading to effective communication for qualified individuals with disabilities so they

can participate equally in **County** programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.

*Modifications to Policies and Procedures:* The **County** will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all **County** programs, services, and activities. For example, individuals with service animals are welcomed in **County** offices, even where pets are generally prohibited.

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a **County** program, service, or activity should contact the office of the ADA Coordinator as soon as possible, but no later than 48 hours before the scheduled event, at:

ADA Coordinator  
825 5<sup>th</sup> Street, Suite 112  
Eureka, CA 95501  
[ADA@co.humboldt.ca.us](mailto:ADA@co.humboldt.ca.us)  
(844) 365-0352  
CRS 711

The ADA does not require the **County** to take any action that would fundamentally alter the nature of its programs or services or impose an undue financial or administrative burden.

Complaints that a **County** program, service, or activity is not accessible to individuals with disabilities should be directed to the ADA Coordinator at the above address.

The **County** will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids and services or reasonable modifications of policy, such as, retrieving items from locations that are open to the public because the location is not accessible to individuals who use wheelchairs.

### **5.3 ADA Grievance Procedure**

Humboldt County has developed, and published grievance procedures as required under Title II. Grievance procedures provide fair and prompt resolution of complaints related to accessibility. The county's grievance procedure is based on the model grievance procedure from the U.S. Department of Justice.

#### **Grievance Procedure Under the Americans with Disabilities Act**

This Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990. It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the County of Humboldt. The county's internal grievance process, as set forth in the county's personnel policies, governs employment-related complaints of disability discrimination.

The complaint should be in writing and contain information about the alleged discrimination such as the name, address, phone number of complainant and location, date, and description of the problem. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint, will be made available for individuals with disabilities upon request.

The complaint should be submitted by the grievant and/or their designee as soon as possible and no later than 60 calendar days after the alleged violation occurred to:

ADA Coordinator  
825 Fifth Street, Suite 112  
Eureka, CA 95501  
ADA@co.humboldt.us  
(844) 365-0352  
CRS 711

Within 15 calendar days after receipt of the complaint, the ADA Coordinator or her designee will meet with the complainant to discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting, the ADA Coordinator or their designee will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille, or audio recording. The response will explain the position of the county and offer options for substantive resolution of the complaint.

If the response by the ADA Coordinator or her designee does not satisfactorily resolve the issue, the complainant and/or their designee may appeal the decision within 15 calendar days after receipt of the response to the County Administrative Officer or her designee.

Within 15 calendar days after receipt of the appeal, the County Administrative Officer or her designee will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, the County Administrative Officer or her designee will respond in writing, and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint.

All written complaints received by the ADA Coordinator or her designee, and responses from these two offices will be retained by the county for at least three years.

## 6.0 Definitions

The following is a summary of many definitions found in the ADA and other accessibility resources. Please refer to the ADA for the full text of the legislative definitions and explanations.<sup>60</sup>

**1991 Standards.** The requirements as noted in ADA Standards for Accessible Design, originally published on July 26, 1991.

**2004 ADAAG.** The requirements set forth in appendices B and D to 36 CFR part 1191 (2009).

**2010 Standards/ADAS.** The 2010 ADA Standards for Accessible Design, consisting of 2004 ADAAG and requirements contained in 28 CFR section 35.151.

**Accessible.** Site, building, facility, or portion of same that is approachable and usable by individuals with disabilities in compliance with technical standards adopted by the relevant Authority Having Jurisdiction (AHJ).

**ADA Coordinator.** Also called Disability Access Manager or Accessibility Manager, this is the individual responsible for coordinating efforts of a government authority to comply with 28 CFR Part 35, Title II and for processing complaints that the entity has violated Title II.

**Alteration in the Public Right-of-Way.** A change to an existing facility that affects or could affect pedestrian access, circulation, or use. Alterations include, but are not limited to resurfacing, rehabilitation, reconstruction, historic restoration, and/or changes to or rearrangement of structural parts or elements of a facility.

**Alternative Text.** Text equivalent for an image appearing in an online document. It is read by screen readers in place of the image so that the content and function of the image is accessible to individuals with visual or certain cognitive disabilities.

**Authority Having Jurisdiction.** A governmental entity that enforces regulations and guidelines for the design, construction, or alteration of buildings and facilities.

**Auxiliary Aids and Services.** Alternative ways of communicating with people who have communication disabilities such as: blindness, vision impairment or loss, deafness, hearing loss, or a combination of vision, hearing, speech and/or language disorders. The key to deciding which aid or service to use for effective communication with individuals with disabilities and their companions is to consider, on a case-by-case basis, the nature, length, complexity, and context of the communication as well as a person's normal method(s) of communication. Auxiliary aids and services include the use of interpreters, note takers, readers, assistive listening systems, captioning and TTYs or the provision of alternate formats such as braille, ASCII text, large print, recorded audio and electronic formats like CDs and DVDs.

**Blended Transition.** Raised pedestrian street crossings, depressed corners, and similar connections between pedestrian access routes at sidewalk level and the level of the pedestrian street crossings and having a grade of five percent or less.

**Clear Ground Space.** Minimum clear walking surface space required to allow a single, stationary wheelchair and occupant. Clear ground space provides a location for a wheelchair user to approach and make use of an element.

**Complaint.** A complaint is an accessibility requirement violation of the ADA.

**Complete Complaint.** Written statement containing complainant's name, address and description of the public entity's alleged discriminatory action with enough detail to inform the agency of the nature and date of the alleged violation and signed by complainant or someone authorized to do so on his/her behalf. Complaints filed on behalf of classes and third parties shall describe/identify by name, if possible, the alleged victims of discrimination.

**Cross Slope.** Walking surface slope perpendicular to the direction of travel. On a sidewalk, cross slope is measured perpendicular to the curb line or edge of street, parking, vegetation or highway.

**Curb Line.** Line at face of curb marking the transition between curb and gutter, street, or highway.

**Curb Ramp.** A ramp cutting through or built up to the curb. Curb ramps can be perpendicular, parallel, or a combination of parallel and perpendicular.

**Disability.** The term disability, relative to individuals, is:

- 1) A physical or mental impairment substantially limiting one or more major life activities of an individual.
- 2) A record of such impairment.
- 3) Being regarded as having a disability or such impairment.

**Discrimination on the Basis of Disability.** Discrimination based on disability includes to:

- Limit, segregate, or classify a citizen in a way that may adversely affect opportunities or status because of the person's disability.

- Limit, segregate, or classify a participant in a program or activity offered to the public in a way that may adversely affect opportunities or status because of the participant's disability.
- Participate in a contract that could subject a qualified citizen with a disability to discrimination.
- Use any standards, criteria, or methods of administration that have the effect of discriminating on the basis of disability.
- Deny equal benefits because of a disability.
- Fail to make reasonable modifications to known physical or mental limitations of an otherwise qualified individual with a disability unless it can be shown that the modification would impose an undue burden on the county's operations.
- Use selection criteria that exclude otherwise qualified people with disabilities from participating in the programs or activities offered to the public.
- Fail to use tests, including eligibility tests, in a manner that ensures that the test results accurately reflect the qualified applicant's skills or aptitude to participate in a program or activity.

**Effective Communication.** Communication with people who have vision, hearing and/or speech disabilities that is equally effective as that with people not having the same disability.

**Element.** Architectural/mechanical component of a building, facility, space, site, or public right-of-way.

**Facility.** All or a portion of buildings, facilities, structures, improvements, elements, and pedestrian or vehicular routes located in the public right-of-way.

**Fundamental Alteration.** Modification significant enough to alter the essence of goods, services, facilities, privileges, advantages, or accommodations. Where demonstrated that a public entity's modification altered the nature of its service, program, or activity, the modification is not required. Where a private entity may demonstrate that modifications for public accommodation would alter the essence of its goods, services, facilities, privileges, advantages, or accommodations, it shall not be required to make the modification.

**Grade.** The degree of inclination of a surface - see Slope. Grade in a public right-of-way is the slope parallel with direction of travel route.

**Grade Break.** Meeting line/intersection of two surface planes having different grades.

**Having a Record of Impairment.** A disabled individual having a history of impairment that substantially limits performance of a major life activity; or having been diagnosed, correctly or incorrectly, as having such impairment.

**Historic Preservation Programs.** Public entity programs having the main purpose conducted of preservation of historic properties.

**International Symbol of Accessibility (ISA).** Recognized worldwide symbol identifying accessible elements and spaces, the published standards under ADA and ABA regulation incorporate the ISA to ensure consistent identification of accessible elements and spaces. Uniform iconography promotes legibility, especially for people with vision or cognitive disabilities. Guidance on the use of the ISA under the ADA is available at <https://www.accessboard.gov/attachments/article/1898/ISA-guidance.pdf>.

**Maintenance.** Periodic repair of elements to restore them to their originally built standard/condition. Maintenance does not change the original purpose, intent, or design of an element.

**Operable Part.** A component of an element used to access or operate it. Technical requirements for operable parts apply to accessible pedestrian signals and pushbuttons, parking meters and parking pay stations serving accessible parking stalls.

**Other Power-Driven Mobility Device (OPDMD).** Mobility device powered by batteries, fuel, or other sources, used by individuals with mobility disabilities for locomotion in areas without defined accessible routes.

**Path of Travel.** A continuous, unobstructed pedestrian passageway used to access a newly constructed or altered area, connecting it with an exterior access route (sidewalks, streets, parking areas, etc.), a facility entrance and other portions of a facility. An accessible path of travel may consist of walkways, sidewalks, curb ramps and other pedestrian ramps; clear floor pathways through lobbies, corridors, rooms, and other improved areas; parking access aisles; elevators and lifts; or a combination of these elements. Within the context of alterations, the path also includes restrooms, telephones, and drinking fountains serving the altered area.

**Pedestrian Access Route.** A continuous and unobstructed path of travel provided for pedestrians with disabilities containing a portion within a public right-of-way.

**Pedestrian Circulation Path.** A surface provided for pedestrian travel in the public right-of-way

**Physical or Mental Impairments.** Physical or mental impairments include: vision, speech and hearing impairments; emotional disturbance and mental illness; seizure disorders; mental retardation; orthopedic and neuromotor disabilities; learning disabilities; diabetes; heart disease; nervous conditions; cancer; asthma; Hepatitis B; HIV infection (HIV condition); and drug addiction, if the addict has completed or is participating in a rehabilitation program and no longer uses illegal drugs.

Conditions not defined as physical or mental impairments: transvestitism; illegal drug use; homosexuality or bisexuality; compulsive gambling; kleptomania; pyromania; pedophilia; exhibitionism; voyeurism; pregnancy; height; weight; eye color; hair color; left-handedness; poverty; lack of education; a prison record; and poor judgment or quick temper, if not symptoms of a mental or physiological disorder.

**Practicable.** Capable of being put into practice within the context of a facility and within the limits of the applicable ABA Conditions for Exception, 1019. Feasible.

**Primary Function.** A facility's major intended activity. Areas containing a primary function include cafeteria-dining areas, conference center meeting rooms, offices and other work areas used to house programs provided by public entities.

**Program Accessibility.** Accessibility to a public entity's services, programs, or activities. These must be readily accessible to and usable by individuals with disabilities.

**Public Entity.** State or local government; department, agency, special-purpose district, or other instrumentality of a state or local government.

**Public Right-of-Way.** Public property, usually interconnected pathways used for transportation purposes.

**Qualified Historic Facility.** A facility eligible for being or listed in the National Register of Historic Places or designated as historic by an appropriate state or local law.

**Qualified Individual with a Disability.** An individual with a disability who meets the essential eligibility requirements for receipt of services or participation in programs and activities provided by a public entity.

**Qualified Interpreter.** A person having a disability who meets the essential eligibility requirements for receipt of services or participation in programs or activities provided by a public entity.

**Reasonable Modification.** The extent of modification by which a public entity must modify its policies, practices, or procedures to avoid discrimination without fundamentally altering the nature of its service, program, or activity.

**Regarded as Having a Disability.** A person is disabled if they are treated or perceived as having an impairment which substantially limits major life activities, regardless of whether such impairment exists.

**Running Slope.** Slope in the direction of a route of travel.

**Scoping.** Determination of what features are required to be accessible and the extent of required accessibility.

**Service Animal.** Service animals are dogs (and in certain circumstances, miniature horses) individually trained to perform tasks for people with disabilities. Examples of such work or tasks include: guiding people having blindness, alerting people having deafness, pulling a wheelchair, alerting and protecting people having a seizure, reminding a person with mental illness to take their prescribed medications, calming a person with Post-Traumatic Stress Disorder (PTSD) during an anxiety attack, or performing other duties. Service animals are working animals, not pets. The work or task a dog has been trained to provide must be directly related to the person's disability. Dogs whose sole function is to provide comfort or emotional support do not qualify as service animals under the ADA. Guidance on the use of the term service animal in the 2010 Standards is published online at [https://www.ada.gov/service\\_animals\\_2010.htm](https://www.ada.gov/service_animals_2010.htm).

Title II regulations now include assessment factors to assist public entities in determining whether miniature horses can be accommodated as service animals in their facilities:

- 1) Whether the miniature horse is housebroken;
- 2) Whether the miniature horse is under the owner's control;
- 3) Whether the facility can accommodate the miniature horse's type, size, and weight;
- 4) Whether the miniature horse's presence will not compromise legitimate safety requirements necessary for the safe operation of the facility.

**Slope.** Inclination of a ground surface. Types of slope include cross slope and running slope.

**Substantial Limitations of Major Life Activities.** Individuals with a physical or mental impairment that (a) renders the person unable to perform a major life activity, or (b) substantially limits the condition, manner, or duration under which this person can perform a particular major life activity.

Major life activities are functions such as caring for oneself, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working.

In determining whether physical or mental impairments substantially limits execution of a particular major life activity, the following should be considered:



- Nature and severity of impairment
- Expected or real duration of impairment
- Permanent or long-term (or expected) impact of/resulting from impairment

**Technical Standards.** Defined design criteria for accessible features: specific number, condition, and measurements required.

**Technically Infeasible.** With respect to alterations to facilities, something unlikely to be accomplished because existing structural conditions would require removing or altering load-bearing members essential to the structural frame or because other existing physical or site constraints restrict modification or addition of elements, spaces or features which are fully and strictly compliant with governing standards.

**Telecommunications Display Device (TDD).** Also known as TTY, this is an electronic device for text communication via telephone line, used when one or more conversing parties has hearing or speech difficulties.

**Telecommunications Relay Service (TRS) or 711.** Reached by calling 711, this is a free, nationwide telecommunications relay service using communications assistants who serve as intermediaries between people who have hearing or speech disabilities and using a text telephone (TTY) or text messaging and people who use standard voice telephones. The communications assistant tells the telephone user what the other party is typing and types to tell the other party what the telephone user is saying. TRS also provides speech-to-speech transliteration for callers who have speech disabilities.

**Text Telephone (TTY).** Often called TDD and reachable by dialing 711, this system is comprised of a keyboard and visual display to exchange written messages over telephone lines. The ADA established a free, nationwide relay network to handle voice-to-TTY and TTY-to-voice calls.

**Vertical Surface Discontinuities.** Differences in vertical level between two adjacent surfaces.

**Video Relay Service (VRS).** A free, subscriber-based service for sign language communicators having videophones, smartphones, or computers with video communication capabilities. On outgoing calls, the subscriber contacts the VRS interpreter, who places the call and serves as intermediary between the subscriber and a standard voice-telephone participant. An interpreter relays to the telephone participant what the subscriber is signing and signs to the subscriber what the telephone participant is saying.

**Wheeled Mobility Device.** Manually operated/power-driven device designed primarily for use by individuals with mobility disabilities related to indoor or indoor/outdoor locomotion. Some examples are manual or power-operated wheelchairs or electric scooters.

## 7.0 Resources

### 7.1 Guidance Documents and Organizations

#### *General*

- **Federal Communications Commission (FCC)**  
Telecommunications Access for People with Disabilities. 2017.  
<http://transition.fcc.gov/cgb/consumerfacts/section255.pdf>

Telecommunications Relay Service – TRS. 2017.  
<https://www.fcc.gov/consumers/guides/telecommunications-relay-service-trs>

- ***A Planning Guide for Making Temporary Events Accessible to People with Disabilities***

ADA National Network. 2015.

<https://adata.org/publication/temporary-events-guide>

- ***Pacific ADA Center***

<https://www.adapacific.org/>

- ***Division of State Architects***

<https://www.dgs.ca.gov/DSA>

## 7.2 Guidance Documents and Articles—Web Design

### ***General Resources***

- ***Web Content Accessibility Guidelines (WCAG) 2.1***

<https://www.w3.org/TR/WCAG21/>

## 7.3 Guidance Documents and Articles—Creating Accessible Documents

### ***General***

- ***Create and verify PDF accessibility (Acrobat Pro)***

Adobe. <https://helpx.adobe.com/acrobat/using/create-verify-pdf-accessibility.html>

- ***Best Practices and Guidelines for Large Print Documents used by the Low Vision Community***

American Council of the Blind (ACB). 2011.

<https://acb.org/large-print-guidelines>

- ***GSA Government-wide Section 508 Accessibility Program***

Guidance on creating and testing accessible documents includes:

- Section 508 Create Accessible Electronic Documents
- Section 508 Basic Authoring and Testing Guides, MS Word 2010 and MS 2013
- Section 508 Basic Authoring and Testing Checklists, MS Word 2010, MS 2013 and MS 2015

- Baseline Tests for Accessible Electronic Documents—MS Word, MS 2013 and MS 2015

<https://www.section508.gov/create/documents>

- ***Braille Transcription Resource List***

National Federation of the Blind.

<https://www.nfb.org/resources/braille-resources/braille-transcription-resources>

## 7.4 Guidance Documents—Historic Properties

### **General**

- ***2016 California State Historical Building Code (SHBC)***  
California Code of Regulations, Title 24, Part 8. California Department of Parks and Recreation. Office of Historic Preservation.  
<http://ohp.parks.ca.gov/pages/1074/files/2016%20CA%20CHBC.pdf>
- ***The California State Historic Building Code (SHBC) and the ADA in Historic Buildings and Sites***  
California Preservation Foundation. 2016.  
<https://californiapreservation.org/events/chbc-ada/>
- ***Common Questions about Title II of the ADA***  
DOJ. Civil Rights Division.  
<https://www.ada.gov/pubs/t2qa.txt>
- ***Technical Preservation Brief 32: Making Historic Properties Accessible***  
U.S. Department of the Interior, National Park Service. Jester, Thomas C and Sharon C. Park. 1993.  
<https://www.nps.gov/tps/how-to-preserve/briefs/32-accessibility.htm>

## 7.5 Guidance Documents and Organizations—Emergency Preparedness Planning for People with Access and Functional Needs

### **General**

- ***Emergency Management Institute (EMI)***  
<http://training.fema.gov/EMI/>
- ***Fire Prevention 52: Fire Safety for People with Disabilities***  
National Park Service.  
<https://www.nps.gov/articles/p52-fire-safety-for-people-with-disabilities.htm>.
- ***Emergency Evacuation Planning Guide for People with Disabilities***  
National Fire Protection Association. 2016.  
<https://www.nfpa.org/-/media/Files/Public-Education/By-Topic/Disabilities/EvacuationGuidePDF.ashx?la=en>

## 7.6 Federal, State, and Local Laws, Standards, and Ordinances

### **Federal Resources**

- **U.S. Department of Justice, Civil Rights Division, Disability Rights Section**  
The U.S. DOJ provides many free ADA materials including the ADA text. Printed materials may be ordered by calling the ADA Information Line [(800) 514-0301 (Voice) or (800) 514-0383 (TTY)]. Publications are available in standard print as well as large-print format, audiotape, braille, and computer disk for people with disabilities. Documents, including the following publications, can also be downloaded from the DOJ website (<http://www.ada.gov/>).
- **ADA Title II Regulations: Nondiscrimination on the Basis of Disability in State and Local Government Services**  
2010. [https://www.ada.gov/regs2010/titleII\\_2010/titleII\\_2010\\_regulations.pdf](https://www.ada.gov/regs2010/titleII_2010/titleII_2010_regulations.pdf)
- **2010 ADA Standards for Accessible Design.**  
2010. [www.ada.gov/regs2010/2010ADASTandards/2010ADASTandards.htm](http://www.ada.gov/regs2010/2010ADASTandards/2010ADASTandards.htm)
- **Accessibility of State and Local Government Websites to People with Disabilities**  
2003. [https://www.ada.gov/websites2\\_prnt.pdf](https://www.ada.gov/websites2_prnt.pdf)
- **ADA Best Practices Tool Kit for State and Local Governments**  
2008. <https://www.ada.gov/pccatoolkit/abouttoolkit.htm>
- **ADA Requirements: Effective Communication**  
2014. <https://www.ada.gov/effective-comm.pdf>
- **ADA Requirements: Service Animals**  
2010. [https://www.ada.gov/service\\_animals\\_2010.pdf](https://www.ada.gov/service_animals_2010.pdf)
- **Frequently Asked Questions about Service Animals and the ADA**  
2015. [https://www.ada.gov/regs2010/service\\_animal\\_qa.html](https://www.ada.gov/regs2010/service_animal_qa.html)
- **ADA Requirements: Wheelchairs, Mobility Aids and Other Power-Driven Mobility Devices**  
2014. <https://www.ada.gov/opdmd.pdf>
- **An ADA Guide for Local Governments: Making Community Emergency Preparedness and Response Programs Accessible to People with Disabilities**  
2008. <https://www.ada.gov/emergencyprepguide.htm>
- **U.S. Access Board—Architectural and Transportation Barriers Compliance Board**  
The full texts of federal laws and regulations that provide the guidelines for the design of accessible facilities and programs are available from the U.S. Access Board.  
<http://www.access-board.gov/>
- **ADA and ABA Accessibility Guidelines (ADAAG), (36 CFR Parts 1190 and 1191).**  
Final Rule published in the Federal Register, July 23, 2004; as amended through May 7, 2014.

<https://www.access-board.gov/attachments/article/412/ada-aba.pdf>

- **ADA Accessibility Guidelines for Buildings and Facilities; ABA Accessibility Guidelines, Correction.**  
Final Rule published in the Federal Register, November 12, 2013.  
<https://www.federalregister.gov/documents/2013/11/12/2013-26780/americans-with-disabilities-act-ada-accessibility-guidelines-for-buildings-and-facilities>
- **Architectural Barriers Act (ABA).**  
Pub. L. 90–480 (42 U.S.C. §§4151 et seq.). 1968. <https://www.access-board.gov/the-board/laws/architectural-barriers-act-aba>
- **Architectural Barriers Act Accessibility Guidelines; Outdoor Developed Areas (AGODA) (36 CFR Part 1191).**  
Final Rule published in the Federal Register, September 26, 2013. <https://www.access-board.gov/attachments/article/1500/outdoor-rule.pdf>
- **Architectural Barriers Act (ABA) Standards.**  
2015. <https://www.access-board.gov/attachments/article/1029/ABAstandards.pdf>
- **Electronic and Information Technology Accessibility Standards; (36 CFR Part 1194).**  
Final Rule published in the Federal Register, December 21, 2000.  
[https://www.access-board.gov/attachments/article/523/508standards\(1\).pdf](https://www.access-board.gov/attachments/article/523/508standards(1).pdf)
- **Guidance on Use of the International Symbol of Accessibility Under the ADA and ABA.**  
2017. <https://www.access-board.gov/attachments/article/1898/ISA-guidance.pdf>
- **Information and Communication Technology (ICT) Final Standards and Guidelines (36 CFR Parts 1193 and 1194)**  
Final Rule published in the Federal Register, January 18, 2017.  
<https://www.access-board.gov/attachments/article/1877/ict-rule.pdf>
- **Outdoor Developed Areas: A Summary of Accessibility Standards for Federal Outdoor Developed Areas**  
May 2014. <https://www.access-board.gov/attachments/article/1637/outdoor-guide.pdf>
- **Telecommunications Act Accessibility Guidelines.**  
Final Rule published in the Federal Register, February 3, 1998.  
<https://www.access-board.gov/attachments/article/1067/255rule.pdf>
- **National Historic Preservation Act (16 U.S.C. 470 et seq.)**  
U.S. Department of the Interior, National Park Service.  
<https://www.nps.gov/history/local-law/nhpa1966.htm>

## **State of California**

- **California Building Standards Code (California Code of Regulations, Title 24)**  
Department of General Services, California Building Standards Commission. 2016.  
<http://www.bsc.ca.gov/Codes.aspx>

The State of California adopted design guidelines for accessible facilities, found in the California Code of Regulations, Title 24, Part II, California Building Standards Code (CBC). The CBC contains general building design and construction requirements relating to fire and life safety, structural safety, and access compliance. CBC provisions provide minimum standards to safeguard life or limb, health, property, and public welfare by regulating and controlling design, construction, quality of materials, use and occupancy, location, and maintenance of all buildings and structures and certain equipment. The complete Title 24 or any of its parts is available for purchase from the International Code Council (ICC), 5360 Workman Mill Road, Whittier, CA 90601, (800) 423-6587, <http://www.iccsafe.org>) or at various bookstores that carry technical books. The CBC is updated every three years and an ongoing program of regularly reviewing these changes and updating policies and procedures related to accessibility to keep them current is recommended.

- ***California Access Compliance Advisory Reference Manual. Valuation Threshold for Alterations, Structural Repairs or Additions to Existing Buildings and Access Compliance Advisory Manual Valuation Threshold for Alterations***

The annual valuation threshold is based on the January 1981 threshold of \$50,000.00 as adjusted using the ENR 20 Cities Construction Cost Index, and as published by Engineering News-Record, McGraw-Hill Publishing Company, for January of each year. In accordance with the 2016 California Building Standards Code Chapter 2 definition of VALUATION THRESHOLD, the 2020 valuation threshold is \$ 170,466 and is generally updated annually in January.

<https://www.dgs.ca.gov/DSA/Resources/Page-Content/Resources-List-Folder/Access-Compliance-Reference-Materials#@ViewBag.JumpTo>

## **8.0 ADA Barrier Analysis - Summary Report**

### **8.1 ADA Barriers in the Built Environment**

The process of developing the Plan included the identification of access barriers within the built environment. Humboldt County evaluated its buildings beginning in 2016 and continuing to 2020.

### **8.2 Accessibility Standards**

At the time of the facilities evaluations, the ADA 2010 Standards, 2016 California Access Compliance Advisory Reference Manual (CBC), 2015 Architectural Barriers Act (ABA), and Federal Standards for Outdoor Developed Areas were used to identify barriers at Humboldt County facilities. An assessment of current conditions based on current code requirements at the time were provided. This data will be useful in production of a baseline for future barrier removal.

### **8.3 Facility Assessments**

#### **Facility Assessments – Buildings & Sites**

During the site evaluations of Humboldt County buildings and sites, all portions of exterior and interior features of the sites and facilities used by the public were evaluated. The assessment identified architectural barrier s in each facility that limit accessibility and reviewed each facility in alignment with the 2010 ADA, 2016 CBC, and the 2015 ABA.

The facility and site evaluations were accomplished using a consultant team equipped with measuring devices, Humboldt County facility information, and evaluation checklists. Diagrams and maps of each site were annotated, and photos documenting conditions were taken during the evaluation process and are included with the ADA Facility Assessments Report. The report is available under separate cover from Humboldt County.

The elements included in the building evaluations are as follows:

Accessible Route	Kitchen
Alarms	Library Facilities
Built-In Elements	Medical Facilities
Bus Stops and Shelters	Parking Areas
Classrooms	Picnic Facilities
Clear Floor Space	Play Area
Constructed Features	Play Equipment Area
Controls and Mechanisms	Public phones
Counters and Tables	Ramp
Corridor	Restrooms
Curb Ramp	Sidewalks
Doors or Gates	Signage
Drinking Fountain	Street Furniture
Dining Areas	Stairway
Elevators	Walkways

## 8.4 Buildings Barrier Report

ADA Access Compliance Assessment Reports are available upon request from the Humboldt County ADA Coordinator.

## 9.0 Footnotes

<sup>1</sup> Code supplied definitions and abbreviations are defined in Section 6 of the report for convenience.

<sup>2</sup> 28 CFR Part 35 (Title II), Subpart B – General Requirements § 35.130 General Prohibitions Against Discrimination

<sup>3</sup> 28 CFR Part 35 (Title II), Technical Assistance Manual, chapter II-3.3000, <https://www.ada.gov/taman2.html>, last accessed February 12, 2020

<sup>4</sup> 28 CFR Part 35 (Title II), Subpart B – General Requirements § 35.133 Maintenance of accessible features

<sup>5</sup> CCR Title 24, Part 2, Volume 1, California Building Code (2019), Chapter 11B -108

<sup>6</sup> 28 CFR Part 35 (Title II), Subpart A - General § 35.105 Self-evaluation

<sup>7</sup> 28 CFR Part 35 (Title II), Subpart D - Program Accessibility § 35.150 (d) Transition plan

- <sup>8</sup> US Access Board, Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right- of Way
- <sup>9</sup> For full detailing requirements, refer to California Department of General Services (DGS) website CBC Advisory Manual at:  
[https://www.dgs.ca.gov//media/Divisions/DSA/Publications/access/2019\\_CBC\\_Advisory\\_Manual.pdf?la=en&hash=A9091D36806F444CF75D554C63363D016F634BDE](https://www.dgs.ca.gov//media/Divisions/DSA/Publications/access/2019_CBC_Advisory_Manual.pdf?la=en&hash=A9091D36806F444CF75D554C63363D016F634BDE).
- <sup>10</sup> Technical Assistance Manual, chapter II-3.3000 – Equality in Participation/Benefits,  
<https://www.ada.gov/taman2.html>, last accessed February 12, 2020.
- <sup>11</sup> 28 CFR Part 35 (Title II), Subpart A - General § 35.133 Maintenance of accessible features
- <sup>12</sup> 28 CFR Part 35 (Title II), Subpart E - Communications, § 35.160 General
- <sup>13</sup> 28 CFR Part 35 (Title II), Subpart A - General § 35.130 General prohibitions against discrimination
- <sup>14</sup> 28 CFR Part 35 (Title II), Subpart A - General § 35.136 Service animals
- <sup>15</sup> 28 CFR Part 35 (Title II), Subpart A - General § 35.106 Notice
- <sup>16</sup> Only dogs are recognized as service animals under title II of the ADA. In limited cases, miniature horses, trained in the performance of tasks for people with disabilities may qualify as service animals, see 28 CFR Part 35 (Title II), Subpart A - General § 35.136 Service animals (i) Miniature horses. Emotional support, therapy, comfort, or companion animals are not considered service animals under this regulation.
- <sup>17</sup> Technical Assistance Manual, chapter II-8.4000 - Notice to the Public  
<https://www.ada.gov/taman2.html>, last accessed February 12, 2020.
- <sup>18</sup> 28 CFR Part 35 (Title II), Subpart A - General § 35.106 Notice
- <sup>19</sup> 28 CFR Part 35 (Title II), Subpart E – Communications § 35.163 Information and signage
- <sup>20</sup> Technical Assistance Manual, chapter II-7.0000 - Communications,  
<https://www.ada.gov/taman2.html>, last accessed February 12, 2020.
- <sup>21</sup> 28 CFR Part 35 (Title II), Subpart E – Communications § 35.160 General
- <sup>22</sup> 28 CFR Part 35 (Title II), Subpart A § 35.130 General Prohibitions Against Discrimination
- <sup>23</sup> Technical Assistance Manual, chapter II-7.2000 - Telephone Communication,  
<https://www.ada.gov/taman2.html>, last accessed February 12, 2020.
- <sup>24</sup> 28 CFR Part 35 (Title II), Subpart E § 35.160 General
- <sup>25</sup> 28 CFR Part 35 (Title II), Subpart E § 35.164 Duties - Closed captioning, though not required for



all audiovisual presentations is a common format of providing access to individuals with hearing impairments and sometimes is the only accessible format.

- <sup>26</sup> See Accessibility of State and Local Government Websites to People with Disabilities, ADA Best Practices Tool Kit for State and Local Governments: <https://www.ada.gov/websites2.htm>, last accessed February 12, 2020.
- <sup>27</sup> Architectural and Transportation Barriers Compliance Board, Title 36 CFR Chapter XI, Part 1193.
- <sup>28</sup> 28 CFR Part 35 (Title II), Subpart E § 35.160 General
- <sup>29</sup> See General Effective Communication Requirements Under Title II of the ADA: <https://www.ada.gov/pcautookit/chap3toolkit.htm>, last accessed February 12, 2020.
- <sup>30</sup> 28 CFR Part 35 (Title II), Subpart E – Communications § 35.161 Telecommunications
- <sup>31</sup> 28 CFR Part 35 (Title II), Subpart E – Communications § 35.161 Telecommunications; § 35.163 Information and signage
- <sup>32</sup> 28 CFR Part 35 (Title II), Subpart E – Communications § 35.160 General; Subpart A §35.130 General prohibitions against discrimination
- <sup>33</sup> 28 CFR Part 35 (Title II), Subpart E – Communications § 35.164 Duties
- <sup>34</sup> 28 CFR Part 35 (Title II), Subpart A § 35.130 General prohibitions against discrimination
- <sup>35</sup> 28 CFR Part 35 (Title II), Subpart E – Communications § 35.160 General
- <sup>36</sup> 28 CFR Part 35 (Title II), Subpart E – Communications § 35.160 General; CCR Title 24, California Building Code, Part 2, Volume 1, Chapter 11-B-703.7.2.4, and 2010 ADAAG Standards 219.2 Required Systems
- <sup>37</sup> CFR Title 49, Subtitle A, Part 38 – Americans with Disabilities Act (ADA) Accessibility Specifications for Transportation Vehicles
- <sup>38</sup> 28 CFR Part 35 (Title II), Subpart A § 35.130 General prohibitions against discrimination; Title 49, Subtitle A, § 38.1 Purpose
- <sup>39</sup> Removed.
- <sup>40</sup> 28 CFR Part 35 (Title II), Subpart A § 35.130 General prohibitions against discrimination
- <sup>41</sup> See Emergency Management Under Title II of the ADA, ADA Best Practices Tool Kit for State and Local Governments: <https://www.ada.gov/pcautookit/chap7emergencymgmt.htm>, last accessed February 12, 2020.
- <sup>42</sup> 42 U.S.C. § 12132 – Title 42, The Public Health and Welfare § 12132 Discrimination; see generally,

- 28 CFR Part 35 (Title II), Subpart B – General Requirements § 35.130 General prohibitions against discrimination, Subpart D – Program Accessibility § 35.149 Discrimination prohibited
- <sup>43</sup> 28 CFR Part 35 (Title II), Subpart E – Communications § 35.163 Information and signage
- <sup>44</sup> 28 CFR Part 35 (Title II), Subpart B – General Requirements § 35.133 Maintenance of accessible features
- <sup>45</sup> ADA Facility Assessment Reports are available through the county’s ADA Coordinator. Each facility is described in its state as observed at the time of the report. Recommendations were made relative to needs and requirements as evaluated by the assessment team. Items not noted to require revision may be mitigated through other recommended changes or may be compliant. Facilities and programs are not necessarily currently in the state noted at the time of the assessment.
- <sup>46</sup> 2010 ADA Standards for Accessible Design §106.5 Defined Terms  
California Building Code §11B-202.4
- <sup>47</sup> 28 CFR Part 35 (Title II), Subpart D - Program Accessibility § 35.151(b) Alterations; CCR Title 24 Part 2, Volume 1, Chapter 11B-202.4 Path of Travel Requirements in alterations, additions and structural repairs
- <sup>48</sup> 28 CFR Part 35 (Title II), Subpart D - Program Accessibility § 35.151(a) Design and construction
- <sup>49</sup> 28 CFR Part 35 (Title II), Subpart D - Program Accessibility § 35.151(a)(2) Exception for structural impracticability
- <sup>50</sup> 28 CFR Part 35 (Title II), Subpart D - Program Accessibility § 35.151(a)(2) Exception for structural impracticability
- <sup>51</sup> 28 CFR Part 35 (Title II), Subpart D - Program Accessibility § 35.150 Existing Facilities (b) Methods (2)(i) Safe harbor
- <sup>52</sup> 28 CFR Part 35 (Title II), Subpart D – Program Accessibility § 35.150 Existing Facilities (b) Methods (2)
- <sup>53</sup> 28 CFR Part 35 (Title II), Subpart D – Program Accessibility § 35.151 New Construction and alterations (b) Alterations (4) Path of Travel (ii)(C) Safe harbor
- <sup>54</sup> 28 CFR Part 35 (Title II), Subpart D - Program Accessibility § 35.150(b)(2)(ii) Safe Harbor
- <sup>55</sup> CCR Title 24, Part 2, Volume 1, California Building Code (2019), Chapter 11B, Section 205 Valuation Threshold
- <sup>56</sup> 28 CFR Part 35 (Title II), Subpart D – Program Accessibility § 35.150 Existing Facilities (b) Methods (2)(ii)
- <sup>57</sup> CCR Title 24, Part 2, Volume 1, California Building Code (2019), Chapter 11B-104.1 Dimensions.

<sup>58</sup> 28 CFR Part 35 (Title II), Subpart D - Program Accessibility § 35.151(b) Alterations ;36 CFR Part 1019; CCR, Title 24, California Historical Building Code (2019), Part 8. California Historical Building Code

<sup>59</sup> 28 CFR Part 35 (Title II), Subpart A – General § 35.107 Designation of responsible employee and adoption of grievance procedures. Also refer to 28 CFR Part 35 (Title II), Subpart F Compliance Procedures

<sup>60</sup> 28 CFR Part 35 (Title II), Subpart A – General § 35.104 Definitions.

## **Other References –**

ADA Update: A Primer for State and Local Governments, Department of Justice, Civil Rights Division  
[https://www.ada.gov/regs2010/title\\_ii\\_primer.html](https://www.ada.gov/regs2010/title_ii_primer.html)

ADA Best Practices Tool Kit for State and Local Governments  
<https://www.ada.gov/pcatoolkit.html>





