



ADA SELF-EVALUATION AND TRANSITION
PLAN FOR THE CITY OF ERIE,
PENNSYLVANIA

January 2013

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1. PURPOSE AND SCOPE

1.1. PURPOSE

The Americans with Disabilities Act (ADA) is a comprehensive civil rights law that prohibits discrimination and ensures equal opportunity for individuals with disabilities. The City of Erie (City) has demonstrated a strong, ongoing commitment to provide equal access to its policies, programs and services in addition to complying with Titles I and II of the ADA. With the enactment of the 2010 Americans with Disabilities Amendments Act (ADAA) and as further evidence of its compliance efforts, the City determined to complete a self-evaluation and transition plan. EMG Corporation (EMG) was contracted to assist in the assessment process.

1.2. SCOPE

The self-evaluation provides a benchmark for accessibility efforts and provides a framework for implementation of the transition plan. Input was sought using the following methods:

- survey of members of the Mayor's Roundtable for Disabilities
- personnel interviews
- physical inspection of City properties
- review of ADA compliant programs and facilities

The transition plan identifies obstacles that limit the accessibility of City programs and services and describes the steps that will be taken to achieve accessibility.

Development of the transition plan involved three phases. Phase I consisted of the actual self-evaluation process. The second phase included administrative review of phase I findings, development of recommended action and prioritization based on need, costs and availability of resources. Phase III is ongoing and involves implementation of the recommended action.

2. SELF-EVALUATION

Located in northwestern Pennsylvania on the edge of Lake Erie, the City of Erie was founded in 1795 and incorporated in 1851. Erie is the fourth largest city in Pennsylvania with a population of approximately 103,000. The City occupies a land area of 19.3 square miles. City Hall houses municipal offices in an 80,000 square foot building.

City water is provided by the independent Water Authority. The Wastewater Treatment Facility is owned by the Erie Sewer Authority and is leased to the City, who is the operator of the facility. It is partially open to the public. Other utilities are provided by private industry.

The City has developed park amenities in the categories of baseball and softball fields, tennis and basketball courts, horseshoe pits and playgrounds.

2.1. SELF-EVALUATION COMPONENTS

2.1.1. PUBLIC SURVEY

The ADA regulations require that an opportunity be provided to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the self-evaluation process by submitting comments.

The participants in the Mayor's Roundtable for Disabilities, a group comprised of members of the disability community, organizations representing individuals with disabilities and interested members of the general public, provided comments via survey to assist in the City's self-evaluation process.

The survey was conducted in the spring of 2011. The survey document was distributed to participants at the Roundtable and by e-mail. The results were used to prioritize ADA accommodations in those areas of noticeable public need. Open-ended questions were presented in the survey to encourage maximum input. The survey document also asked respondents to rate facility features and their importance in relationship to accessibility. Respondents rated the features from highest importance to lowest importance, with "1" being the highest rating. The survey document is attached as Appendix 1.

A limited number of survey responses (9) were received. Several respondents mentioned a general need for better physical access to City buildings, offices and parks. Access to public restrooms was of minor concern. Many of the comments were directed to a need for snow removal at privately owned businesses and residences, areas for which the City is not responsible under the ADA. The same was true for responses concerned with on-street business and residential parking. These are areas which are not the City's responsibility under the ADA.

2.1.2. CITY STAFF INTERVIEWS

The following personnel from City facilities were interviewed in the process of conducting the ADA self-evaluation:

- Joseph Sinnott, Mayor
- Massimo Sala, ADA Coordinator
- Connie Cook, Human Resources Manager
- Steven Benson, Chief Information Officer
- Fred Rush, Community Initiatives Coordinator
- James Gorski, Wastewater Treatment Bureau Chief
- Jacob Schwab, Firefighters' Historical Museum President

2.1.3. ASSESSMENT OF CITY FACILITIES

For purposes of the self-evaluation, the EMG assessment team inspected the following properties of the municipal and public park system:

MUNICIPAL BUILDINGS

- City Hall
- Wastewater Treatment Plant
- Firefighters' Historical Museum

PARK AND RECREATION FACILITIES

- Baldwin Park
- Barbara Nitkiewicz park

- Bayview park
- Burton park
- Downing golf course clubhouse
- Frontier park
- Glenwood park
- Hillside park
- J.C. Martin golf course clubhouse
- McCarty playground
- Nate Levey park
- Perry Square park – east and west
- Rodger Young park and pool
- Wallace Street playground

2.2. ADA COMPLIANT POLICIES AND PROGRAMS

A review of the City's ADA compliant policies, programs and facilities was undertaken to assist in the self-evaluation process, as summarized below:

2.2.1. OFFICE OF THE ADA COORDINATOR

The City of Erie has a designated ADA Coordinator. The ADA Coordinator page of the City's official website, <http://erie.pa.us/Departments/ADACoordinator/>, is dedicated to the ADA activities of the City and displays official ADA policies of the City as well as provides links to related websites. The webpage includes the name, address and phone number of the designated ADA Coordinator. A "Visit-able Homes" brochure is also made available within the ADA Coordinator's webpage. It focuses on ADA information for home renovation and new construction. In 2007, Erie City council passed a resolution supporting "Visit-ability" Design by requiring distribution of an informational flyer to all building permit applicants. The flyer urges contractors to build at least one "zero step" entrance to new facilities, make all main floor door widths wheelchair accessible and provide a bath on the main floor.

Additional policies adopted by the City to assist individuals in accessing its services, programs and activities are posted on the webpage at [http://www.erie.pa.us/Departments/ADA Coordinator/tabid/512/Default.aspx](http://www.erie.pa.us/Departments/ADA%20Coordinator/tabid/512/Default.aspx)

2.2.2. PUBLIC MEETING POLICY

The Office of the Mayor has directed that a public meeting statement be included in all meeting and event notices, posting and mailings. This policy appears on the ADA Coordinator page of the official City website. The policy reads as follows:

It is the policy of the City of Erie that all City-sponsored public meetings and events are accessible to people with disabilities. If you need assistance in participating in this meeting or event due to a disability as defined under the ADA, please call the City's ADA Coordinator, Mas Sala at (814)870-1469 at least five (5) business days prior to the scheduled meeting or event to request an accommodation.

2.2.3. REASONABLE ACCOMMODATION POLICY

The Office of the Mayor has also directed that a reasonable accommodation policy be adopted. It appears on the ADA Coordinator webpage and reads as follows:

In accordance with the Americans with Disabilities Act of 1990, the City of Erie has adopted the following policy for addressing requests for reasonable accommodations made by people with disabilities in its services, activities, programs, policies, procedures, rules and regulations. Citizens seeking accommodations through the ADA should submit their request in writing* to: ADA Coordinator, Attn: Mas Sala, City of Erie, 626 State Street, Room 404, Erie, PA 16501, (814)870-1469. The ADA Coordinator will consider the accommodation and the petitioner will be notified within one week of receipt of the request. * Alternative means of filing a request, such as through personal interviews, phone calls, or taped requests, will be made available for persons with disabilities who are unable to communicate in writing.

2.2.4. MAYOR'S ROUNDTABLE FOR DISABILITIES

The Mayor's Office has established the Roundtable for Disabilities dedicated to the ADA and its impact on the disabled community. Previous mayoral administrations also utilized the ADA Roundtable concept.

The Roundtable meets quarterly throughout the year. The public is invited to participate and is notified of the meetings through the ADA Coordinator's webpage, on the municipal "Channel 9" television station and by e-mail. In addition to the Mayor and the ADA Coordinator, participants have included consumer advocacy group representatives, local citizens, service providers and City Council members. The minutes of each meeting are available to the public on the ADA Coordinator's webpage.

2.2.5. AUXILIARY AIDS AND SERVICES

A sign language interpreter is under contract with the City and is utilized for the ADA Roundtable meetings when needed. The interpreter is also available for other public meetings and events if requested in advance.

In addition, the City has provided access to City Council meetings by adjusting the citizens' microphone level to be wheelchair accessible, adopting a policy that accolades and awards are to be presented below the raised stage and making agendas available in large print if requested. The City is exploring options regarding additional access to the City Council dais.

2.3. ADA COMPLIANT PHYSICAL ACCOMMODATIONS

2.3.1. CURB RAMPS

As streets are milled and improved, the City has spent a significant portion of its Public Works budget on installation of curb ramps. The construction of curb ramps throughout the City is in progress and the overall project is an ongoing process.

2.3.2. OFF-STREET PARKING

Off-street handicapped parking spaces are available at City Hall, the wastewater treatment plant and many park properties.

2.3.3. ELEVATORS

Shortly after the enactment of the ADA, the City modified the City Hall elevator system to accommodate wheelchairs and vision impairment.

2.3.4. FACILITY ENTRANCES

Paths of entry and entrance doors to City Hall and the wastewater treatment plant are generally compliant with 1991 ADA regulations.

2.3.5. PUBLIC RESTROOMS

The public restrooms located on the first floor of City Hall were made accessible under the 1991 ADA regulations.

2.3.6. CITY COUNCIL CHAMBERS

The front row of seating in City Council Chambers has been removed to provide additional space to accommodate wheelchair seating. Portable chairs are available for companion seating adjacent to the wheelchair seating. The City is exploring options regarding additional access to the City Council dais.

2.3.7. ACCESSIBLE PLAYGROUND

An accessible playground was constructed in June 2011 at Gridley Park. It is the result of collaboration between the City, the Pennsylvania League of Cities and Municipalities, the Pennsylvania Department of Conservation and Natural Resources, and the national non-profit organization KaBOOM!.

2.3.8. FESTIVALS

A number of festivals are held throughout the year on City property by permit. "Celebrate Erie" is the only festival managed by the City. It is held in the Perry Square parks and the streets surrounding the park. A color brochure is made available that depicts the location of accessible facilities, which include handicapped parking areas and ADA accessible portable toilets. The City Festival Committee attends Roundtable meetings to stay current on accommodation requirements.

2.3.9. TELECOMMUNICATION SERVICES

A TTY system is available for public use in the City Treasurer's office located adjacent to the main lobby. The national 711 telecommunications relay service for the hearing impaired is available for access to and from any City employee. City employees will be notified of the availability of the 711 telecommunications relay service. The web site containing directions for using the service is located at <http://www.fcc.gov/guides/711-telecommunications-relay-service>

2.3.10. FIREFIGHTERS' HISTORICAL MUSEUM

The ADA does not require a public entity such as the City of Erie to take any action that would threaten or destroy the historical significance of an existing historic property. Nor does it require a public entity to take any action that would result in a fundamental alteration in the nature of a program.

The ADA provides that where a physical alteration to an historic property is not feasible, alternate methods of achieving program accessibility may include use of audio-visual materials to depict inaccessible areas of the property. An audio/visual tape is available at the Firefighters' Historical Museum serving to provide program access to inaccessible areas of the museum.

2.4. RECOMMENDATIONS

A summary of suggested upgrades to programs and facilities is listed below. These items were considered in detail and prioritized as part of the City's transition plan.

2.4.1. CITY WEBSITE

It is recommended that the official City website be modified to improve access by disabled users. For example, icons could be added to the website to indicate accessible City facilities. For site visitors using assistive technologies such as screen readers or scanning software, an icon indicating the accessible portions of the website could be located on the homepage.

2.4.2. OFFICE OF THE ADA COORDINATOR

A commercial building renovation brochure, similar to the "Visit-able Homes" brochure, could be developed and made available to a wide audience. It should be made accessible through the ADA Coordinator's webpage.

2.4.3. SERVICE COUNTERS

It is recommended that wheelchair access be provided at various service counters within City Hall and the golf course clubhouses to alleviate height issues.

2.4.4. CITY COUNCIL CHAMBERS

It is recommended that assisted listening device signage be moved to the entrance.

2.4.5. DIRECTIONAL SIGNAGE WITHIN CITY HALL

Improved signage directing disabled individuals to facilities within City Hall is recommended.

2.4.6. CITY PARKS-ROUTES OF TRAVEL

Walkway maintenance and/or repairs are necessary in several City parks.

2.4.7. CITY PARKS-MISCELLANEOUS

Bleachers and trash cans should be moved within City parks to provide wheelchair access from paved walkways. Water fountains and portable restrooms should be made accessible.

3. TRANSITION PLAN

This transition plan serves as a data point of reference, representing the state of selected programs and facilities within the jurisdiction of the City. Due to the City's efforts to make as many ADA accommodations as possible on a continuing basis, some activities listed may have been completed prior to adoption of the transition plan.

3.1. PRIORITY LEVELS DEFINED

Recognizing that the City has limited funds and cannot immediately make all programs and facilities fully accessible, ADA upgrades had to be prioritized. The applicable priority levels have been established as follows:

- Priority Level 1: Access to places of public accommodation such as City Hall and City parks (i.e. curb ramps, walkways, parking spaces, passenger loading zones, automatic doors at designated public entrances)

- Priority Level 2: Access to City programs and program function areas (i.e. routes of travel, website, signage, service counters)
- Priority Level 3: Access to common areas that support program function areas (i.e. public restrooms, drinking fountains, public telephones)

3.2. SUMMARY OF PRIORITY LEVEL ASSIGNMENTS

The transition plan priorities for City program and facility upgrades are summarized below.

Priority Level 1

- continue curb ramp installation
- resolve service counter height issues by providing a wheelchair accessible table and signaling device such as a bell to service counters in the following City Hall offices: Treasurer, City Taxes, City Clerk, Residential Licensing, Engineering, Code Enforcement, Economic and Community Development, Police Investigations, Parking Tickets, Public Works, Special Events, Human Resources
- provide equipment to make the Rodger Young pool accessible
- amend festival licensing agreements to facilitate accessible routes and HC restroom accessibility where possible
- move assisted listening device signage to entrance door in City Council assembly room
- move park bleachers closer to existing paved paths
- move park trash receptacles closer to existing paved paths
- provide van accessible parking spot at the wastewater treatment plant, Downing and J.C. Martin golf course clubhouses, Glenwood park, Frontier park, Hillside park

Priority Level 2

- improve paved paths of travel by sidewalk maintenance and/or repair in the vicinity of City Hall and in City parks
- increase ADA Coordinator's office interface with the business community and develop a brochure for business similar to the "Visit-able Homes" brochure
- provide compliant directional signage in City Hall lobby indicating location of elevators and accessible restrooms
- modify City web site to add accessibility icons to pinpoint accessible programs and facilities; provide links to policies/procedures on HR page; add ADA non-discrimination policy statement and grievance procedure to ADA Coordinator web page

Priority Level 3

- resolve service counter height issues at Rodger Young park concession stand and J.C. Martin and Downing golf course clubhouses by providing wheelchair accessible table and signaling device such as a bell to service counters
- provide unisex ADA portable restrooms in parks where public restrooms are provided
- provide access to water fountains in City Hall, where needed, Downing and J.C. Martin golf course clubhouses and parks; provide paper cups where feasible
- provide accessible picnic tables and/or grills in parks where such items are offered
- adjust accessible door closure time (sweep period) at City Hall entrances, Downing Golf Course clubhouse/pro shop, J.C. Martin Golf Course clubhouse

3.3. UNDUE BURDEN

The ADA does not require a public entity to take any action that it can demonstrate would result in a fundamental alteration in the nature of its program or service, would create a hazardous condition for other individuals, or would represent an undue financial and administrative burden.