

ADA Self-Evaluation and Transition Plan



Final Plan



12/3/2019

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Executive Summary

Napa County's Americans with Disabilities Act (ADA) Self-Evaluation and Transition Plan (the Plan) supports the County in fulfilling the requirements set forth in title II of the ADA. The ADA states that a public entity must reasonably modify its policies, practices, or procedures to avoid discrimination against people with disabilities. The Plan assists the County in identifying policy, program, and physical barriers to accessibility and guides the County in developing barrier removal solutions to facilitate the opportunity of access to all individuals.

ADA Coordination & Management

As required by the ADA, Napa County designated an ADA Coordinator to oversee the implementation of the Plan. David Peters, in the Risk Management Division of the Napa County Executive Office, will serve as the ADA Coordinator. The ADA Coordinator is responsible for the coordination and development of the County's efforts to comply with title II and for investigating any accessibility-related complaints. The ADA Coordinator is also responsible for overseeing the County's efforts to comply with all other applicable state and federal facility and program accessibility requirements. Department liaisons are identified to support the work with the ADA Coordinator in tracking and monitoring the implementation of the Plan.

Involving People with Disabilities

As required by the ADA, Napa County involved people with disabilities in the development of the Plan. A focus group was brought together to provide insights on the planning process. During two separate sessions, the group participants reviewed project work products, shared experiences, discussed planning priorities for the removal of barriers, and reviewed the draft Plan. As part of the implementation of the Plan, the County intends to regularly seek ongoing feedback on its accessibility practices. The ADA Coordinator will work with interested residents on the best model to receive that input. Contact information for the current ADA Coordinator is as follows:

David Peters, ADA Coordinator
1195 Third Street, Napa, CA 94559
phone: 707-259-8744
telecommunication relay service: 711
email: adacoordinator@countyofnapa.org

Accessibility of County Programs, Activities, and Services

Title II of the ADA emphasizes the accessibility of programs, activities, and services. 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, activities, and services.

Accessibility of County Facilities

When relocating programs, activities, and services to accessible locations or providing auxiliary aids and services is not feasible, the ADA requires the County to complete a transition plan describing the physical modifications to facilities that will support accessible programs, activities, and services. The County's transition plan is the result of a detailed evaluation of all County facilities where programs, activities, and services are available to the public, including the public right-of-way. The County will remediate facility barriers through policy and procedure modifications to remove programmatic barriers, or maintenance and construction projects to remove structural barriers.

Title II regulations state that if a transition plan will take more than one year to fully implement, it must contain interim steps to provide program accessibility. A 15-year time frame for barrier removal at County facilities was identified. The Plan provides a framework for the continuous improvement to facilities for people with disabilities. Napa County is formulating a plan to address lower-cost and lower-intensity modifications within an accelerated timeframe to make progress while initiating longer term projects. Additional interim measures will be explored and implemented to provide better access for the public pending the implementation of major physical barrier removal projects at all County facilities.

Moving Forward

The Plan provides the foundation for removing barriers to facilities and programs offered by the County. It inventories the current status of the County's programs, activities, services, and facilities. It provides recommendations for the removal of programmatic and facility barriers, establishes a timeline for mitigation of architectural barriers, and involved people with disabilities in the process.

Acknowledgements

Many individuals were involved with the development of the Napa County ADA Self-Evaluation and Transition Plan

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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 – Napa County Transition 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 defines commonly used terms in the Plan and the ADA.

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

Napa County Organizational Structure

Napa County is a large and complex organization with 19 departments and multiple divisions. The County organizes the executive administration of the departments into five functional areas defined by the County Executive Office. The functional areas are actively used within the County to organize ongoing administration and responsibilities. They were used as part of this planning process to organize the analysis and recommendations and are referenced throughout the Plan. The functional areas are:

Community Resources and Infrastructure.

Agricultural Commissioner, County Library, Planning, Building, and Environmental Services, Public Works, and UC Cooperative Extension

General Administration and Finance.

Assessor and Recorder-Clerk, Auditor-Controller, County Counsel, County Executive Office, Board of Supervisors, and Treasurer-Tax Collector

Human Services.

Health and Human Services

Law and Justice.

Child Support Services, District Attorney, Probation, and Public Defender

Public Safety.

Corrections, Fire Protection, and Sheriff

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ADA Acronyms

The following acronyms are some of the most prevalently used 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

DOJ – U.S. Department of Justice

DSA – California Division of the State Architect

ISA – International Symbol of Accessibility

OPDMD – Other Power-Driven Mobility Device

PROWAG – Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way

TDD – Telecommunications Display Device

TRS – Telephone Relay Service or 711

TTY – Text Telephone

VRI – Video Remote Interpreting Services

VRS – Video Relay Service

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1 Introduction

The Americans with Disabilities Act (ADA) is a comprehensive civil rights law for people with disabilities. Title II of the ADA states that a public entity must reasonably modify its policies, practices, and procedures to avoid discrimination against people with disabilities. This ADA Self-Evaluation and Transition Plan (“the Plan”) will support Napa County in fulfilling the requirements set forth in title II of the ADA. The Plan identifies accessibility barriers in County policies, programs, and facilities and guides the County in developing barrier removal solutions.¹

1.1 Legislative Mandate

The ADA provides protection against discrimination in employment and the provision of goods and services for people with disabilities. The original version of the law was passed by Congress in 1990 to provide a “clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities.” Congress emphasized that the ADA seeks to dispel stereotypes and assumptions about disabilities and to assure equality of opportunity, full participation, independent living, and economic self-sufficiency for people with disabilities. Updated accessibility standards were published in 2010 (“2010 Standards”).

The law is organized into five titles and title II of the ADA covers the programs, activities, and services of public entities. The Attorney General of the Department of Justice (DOJ) is responsible for publishing the regulations that implement these statutory requirements. Under title II, “No qualified individual with a disability shall, on the basis of disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity.”² More specifically, public entities may not, either directly or through contractual arrangements:

- deny persons with disabilities the opportunity to participate as members of advisory boards and commissions;
- deny persons with disabilities the opportunity to participate in services, programs, or activities that are offered to others or compel people to participate in separate or different activities based on disability;
- make selections in determining the location of facilities that have the effect of excluding or discriminating against persons with disabilities; or
- deny access to people with disabilities who require the assistance of a service animal in any area of the County’s facilities where the public is normally allowed.

¹ The Plan uses terminology that may be unfamiliar to some audiences. The language has been simplified where possible, but conformance to statutory language within this document is prioritized. For assistance, see Section 6: Definitions and the list of acronyms after the table of contents.

² DOJ, Title II Regulations Subpart B § 35.130 General prohibitions against discrimination

1.2 Accessible Programs and Facilities

Napa County, as a public entity, is subject to the ADA's title II requirements and is responsible for the provision of accessible programs and facilities. A fundamental tenet of title II is the principal of program accessibility, 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."³ A public entity is not necessarily required to make each of its existing facilities accessible but is obligated to maintain its accessible facilities in working order. Exceptions are provided for temporary disruptions in both the ADA ⁴and the California Building Code (CBC).⁵

1.3 Discrimination and Accessibility

The absence of discrimination requires the provision of both physical and program accessibility. Physical accessibility requires that a facility be barrier-free where public programs and activities are provided. Barriers include any obstacles that prevent or restrict the entrance to or use of a facility. Program accessibility requires that individuals with disabilities are provided an equally effective opportunity to participate in or benefit from a public entity's programs and services. Program accessibility includes physical accessibility, but also entails all the policies, practices, and procedures that permit people with disabilities to participate in programs and to access important information.

Additionally, program accessibility includes advertisement, eligibility, participation, testing or evaluation, physical access, provision of auxiliary aids and services, transportation, policies, and communication. Program accessibility may be achieved by either structural or non-structural methods. A public entity may achieve program accessibility by several methods:

- alteration of an existing facility,
- acquisition or redesign of equipment,
- assignment of aids to beneficiaries, and/or
- provision of services at alternate sites.

When choosing a method of providing program access, public entities are required to prioritize the method that results in the most integrated setting appropriate to encourage interaction among all users, including individuals with disabilities.

³ ADA Title II Technical Assistance Manual II-3.3000

⁴ ADA Title II Technical Assistance Manual II-3.10000

⁵ 2019 California Access Compliance Advisory Reference Manual, Division of the State Architect, 11B-108

1.4 ADA Self-Evaluations and Transition Plans

Under title II, public entities are required to undertake two initiatives: a self-evaluation of programs, activities, and services,⁶ and the development of a transition plan to identify and schedule remediation of physical barriers.⁷

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

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

The transition plan process identifies physical barriers in facilities and within the public right-of-way and schedules the removal of those barriers over time. The County's transition plan must include:

- a list of accessibility barriers in County facilities;
- a detailed outline of feasible methods to remove these barriers;
- a schedule for removing barriers to accessibility;
- an opportunity for public comment on the development of the transition plan; and
- the name of the individual responsible for the transition plan's implementation.

In 2017, the County conducted a self-evaluation of its programs, activities, and services and a physical audit of County-owned buildings, sites, and public right-of-way facilities. Based on the findings from these efforts, County staff are actively working to address barriers and track progress in remediation. The County is looking at the most appropriate models to address the removal of physical barriers, including staffing models. Section 2 of the Plan addresses the self-evaluation, and Section 3 contains the County's transition plan.

⁶ DOJ, Title II Regulations Subpart A § 35.105 Self-evaluation

⁷ DOJ, Title II Regulations Subpart D § 35.150 (d) Transition plan

1.5 Federal and State Accessibility Standards

In addition to federal ADA standards, public entities are required to comply with various complementary state and federal statutes and consider legal precedents and best practices regarding accessibility. Napa County's technical mandates on facility accessibility, for example, are from state and federal design standards. There are presently no statutory standards for pedestrian facilities in the public right-of-way under the ADA for state and local government entities, but the Access Board had developed proposed guidelines⁸ considered a best practice. Wherever possible, this Plan attempts to define, clarify, and distinguish these overlapping standards, legal precedents, and best practices.

1.6 Public Outreach for the Plan

A public entity is required to solicit and accept comments from the public as part of its self-evaluation and transition planning process, including individuals with disabilities and the organizations that represent them. Many people with disabilities have unique perspectives on a public entity's programs, activities, services, and facilities.

For this planning process, the County formed a focus group of County residents representing various disability interest areas. Focus group meetings were held on May 23, 2018, and June 3, 2019, to introduce the project, receive questions and comments related to the Plan, and provide feedback on the development of the draft ADA Self-Evaluation and Transition Plan. Summaries from these meetings are included as Appendix A: Public Outreach.

In addition to the focus group, the Public Review Draft of the Plan was posted on the County's website and hard copies were made available at County libraries and select County offices for public comment. After the public comment period, final edits were completed, and the Plan was presented to the County Board of Supervisors for adoption and/or acceptance.

⁸ US Access Board, Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way

2 Napa County Self-Evaluation

Programs, activities, and services offered by Napa 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. This process included an online program accessibility questionnaire for selected County staff and a review of the policies and practices based on written information provided by County staff and the County's website. An ADA Self-Evaluation Report was compiled and shared with the public, addressing recommendations for specific improvements. The content of the full report is compiled in a Program Inventory Excel workbook, intended to be the County's ongoing record of barrier remediation.

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

2.1 Programmatic Modifications

The ADA Coordinator or designee will follow-up with each department to review the recommendations contained in the self-evaluation. In those situations where a policy, program, or procedure creates a barrier to accessibility that is unique to a department or a certain program, the ADA Coordinator, or designee, will coordinate with the program manager to address the removal of the barrier in the most reasonable and accommodating manner in accordance with applicable law.

2.2 Required and Recommended Actions

The self-evaluation findings in this section are organized into categories based on the requirements of title II of the ADA. Each category includes a brief description, required actions for compliance, and recommended actions. The recommended actions are strategies to assist staff in implementing the required actions. They are not all-inclusive and may be adapted as new technologies and opportunities arise. More information about requirements and strategies can be found in the “ADA Best Practices Toolkit for State and Local Governments”.⁹ Statutory citations and links to the toolkit are provided in footnotes throughout this section.

Accessible and Adaptive Equipment

Adaptive aids include devices, controls, appliances, or items that make it possible for people with disabilities to improve their ability to function independently and participate in programs, services, and activities offered by the County.¹⁰

Required Actions

1. Provide and maintain, in working order, accessible equipment for people with disabilities when equipment is provided to the public.¹¹
2. Provide appropriate auxiliary aids and services in a timely manner, giving primary consideration to the requests of individuals with disabilities.¹²

Recommended Actions

- Review equipment provided by the County for use by the public, such as computers, copy machines, telephones, or other technologies, to identify potential barriers to accessibility and corresponding solutions.
- Collaborate with community organizations that serve people with disabilities to develop and maintain a resource list of assistive technology and accessible equipment.
- Establish and maintain a toolkit of adaptive aids and resources for staff who interact with the public. Include information about both onsite and contracted services.
- Include accessibility as a criterion for purchasing equipment such as furniture, site furnishings, and office systems. Whenever possible, evaluate furniture and building material purchases for compatibility with a wide range of disabilities and sensitivities.

⁹ For the full toolkit, visit <https://www.ada.gov/pcatoolkit/toolkitmain.htm>. “The Tool Kit should be considered a helpful supplement to – not a replacement for – the regulations and technical assistance materials that provide more extensive discussions of ADA requirements. It also does not replace the professional advice or guidance that an architect or attorney knowledgeable in ADA requirements can provide.”

¹⁰ See <https://www.ada.gov/pcatoolkit/chap1toolkit.htm>.

¹¹ DOJ, Title II Regulations Subpart A § 35.133 Maintenance of accessible features

¹² DOJ, Title II Regulations Subpart E § 35.160 General

Customer Service

In-person interaction with the public is one of the primary functions of most County departments. To meet ADA standards for in-person interactions, staff should be aware of the formal and informal procedures for accommodating people with disabilities, including appropriate responses to requests for program modifications and guidelines for accommodating service animals.

Required Actions

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

Recommended Actions

- Adopt or adapt the DOJ Model Grievance Procedure, provided in Section 5 of the Plan.
- Develop a process for determining reasonable modifications as they are requested. The process should address the following:
 - Ensure the public has easy access to information about how to make a request for modifications and who to contact.
 - Ensure every department has staff that can direct a person making a request to the appropriate staff member.
 - Ensure requests can be accepted from someone on behalf of the person with a disability and are not required to be in writing.
 - Ensure each department has staff that are trained to appropriately respond to requests, including an understanding of when requests should be fulfilled immediately and when more information and planning is required to provide a modification.
- Publicize the County's ADA grievance procedure to ensure that individuals with a disability can formally communicate with the County if they are not satisfied with the results of the request process.

¹³ DOJ, Title II Regulations Subpart A § 35.130 General prohibitions against discrimination

¹⁴ DOJ, Title II Regulations Subpart A § 35.136 Service animals

¹⁵ DOJ, Title II Regulations Subpart A § 35.106 Notice

- Track the outcomes of all accessibility requests to look for global issues that can be addressed, to evaluate the success of program modifications, and to identify problems that can be solved proactively to improve customer service.
- Develop a formal process for changing standard operating procedures when needed to fulfill a modification request.
- Develop guidelines to ensure the inclusion of service animals at County facilities,¹⁶ Appropriate exclusions are limited. Policies should provide a standard procedure for addressing a service animal that is out of control and the handler does not take effective action to control it, a service animal that is not housebroken, or a service animal that would fundamentally alter the nature of a service or program if admitted into a particular facility or program.
- Assess the composition and needs of the population of people with disabilities in the county. This can be accomplished by developing relationships with community members with disabilities and organizations that serve people with disabilities.
- Conduct outreach to people with disabilities to improve communication, increase participation, and incorporate them in the process of developing guidance on planning, programs, and possible modifications.

¹⁶ Only dogs are recognized as service animals under title II of the ADA. In limited cases, miniature horses that are individually trained to perform tasks for people with disabilities may also qualify to provide services as specified in DOJ, Title II Regulations Subpart A § 35.136 Service animals (i) Miniature horses. Emotional support, therapy, comfort, or companion animals are not considered service animals under the ADA. Assessment factors for miniature horses are provided in Section 6 of the Plan.

Notice Requirements

The County Executive Officer (CEO) shall determine the most effective way of providing notice to the public about their rights and the County's responsibilities under the ADA. This information should be provided whenever necessary, but no less than annually.¹⁷

Required Actions

1. Provide public notice regarding the County's commitment to providing accessible services.¹⁸
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.¹⁹

Recommended Actions

- Adapt or adopt the model notice provided by the DOJ, which is provided in Section 5 of the Plan.
- Provide notice of the availability of program modifications, alternative formats of materials, and auxiliary aids. Include contact information for the member of staff who can provide assistance and note that 72-hour notice is required.
- Include a nondiscrimination notice in County publications and include the name and contact information for the County's ADA Coordinator. The language of the notice should be similar to the following:

Napa County does not discriminate on the basis of disability in the admissions or access to its programs or activities. An ADA Coordinator has been designated to coordinate compliance with the nondiscrimination requirements contained in the Department of Justice regulations implementing Subtitle A of title II of the Americans with Disabilities Act (42 U.S.C. 12131-12134), which prohibits discrimination on the basis on disability by public agencies.

- Republish and rebroadcast radio, newspaper, television, or mailings of the notice periodically, as applicable.
- Increase outreach to people with disabilities and the organizations that serve them to provide information about possible modifications and the accessibility of services, programs, and activities.
- Ensure staff is aware of the public locations of the nondiscrimination statement and the procedure for filing a disability discrimination complaint.

¹⁷ See <https://www.ada.gov/pcatoolkit/chap2toolkit.htm>

¹⁸ DOJ, Title II Regulations Subpart A § 35.106 Notice

¹⁹ DOJ, Title II Regulations Subpart A § 35.163 Information and signage

Printed Information

To meet the ADA's communication standards, County departments must be able to provide information in alternative formats such as easy-to-understand language, braille, large print, audiotape or CD, computer media, or other formats as requested.²⁰

Required Actions

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

Recommended Actions

- Include a notice on public materials printed by the County, similar to the following:
This publication can be made available in alternative formats, such as large print, braille, or electronic format. Requests can be made by calling the ADA Coordinator at 707-259-8744 (Voice) or by using the 711 Telecommunications Relay Service. Please allow 72 hours for your request to be processed.
- Provide training to staff on producing printed information in alternative formats for people with various disabilities to ensure that requests are handled in a uniform and consistent manner.
- Develop and implement standard templates for producing accessible County materials that are consistent with County branding and style.
- Review information on developing accessible printed materials provided in Section 7 of the Plan.
- Include images of people with disabilities when images of people are included in County printed materials.

²⁰ See <https://www.ada.gov/pcatoolkit/chap3toolkit.htm>

²¹ DOJ, Title II Regulations Subpart A § 35.160 General

²² DOJ, Title II Regulations Subpart A § 35.130 General prohibitions against discrimination

Audiovisual or Televised Information

Televised and audiovisual information is a means for disseminating public information through presentations produced by County departments. All televised and audiovisual information including PowerPoint presentations must be accessible to people with disabilities. As more communication is done remotely through the internet, it will be increasingly important that all communication tools maintain accessibility as technology changes.²³

Required Actions

1. Provide alternative formats to audiovisual presentations produced by or for the County upon request.²⁴

Recommended Actions

- Review County presentations, videos, and recordings of meetings to identify potential barriers to accessibility and corresponding solutions.²⁵
- Encourage presenters to read the slides and describe the graphic content when presenting PowerPoint or other visual presentations.
- Include images of people with disabilities when images of people are included in County audiovisual materials.

²³ See <https://www.ada.gov/pcatoolkit/chap3toolkit.htm>

²⁴ DOJ, Title II Regulations Subpart A § 35.160 General

²⁵ Closed captioning is not required for all televised or audiovisual presentations, but it is a common way of making them accessible to people who are unable to hear the audio portion, and in some instances, it might be the only accessible format.

Website

As individuals turn to the internet as their primary source of information regarding services, programs, activities, and facilities, the County's website at <http://www.countyofnapa.org/> takes on increased importance as a communications tool. Providing online public access to County publications is one way to effectively reach people with disabilities.²⁶ Accessibility standards for electronic and information technology are covered by Section 508 of the Rehabilitation Act. Although Section 508 applies to federal public entities, its technical and functional performance criteria are considered best practice and are recommended for state and local public entities.²⁷

Required Actions

1. Ensure that the County's online communication with people with disabilities is as effective as other communications with the public.²⁸

Recommended Actions

- Publish the Policy on Nondiscrimination on the Basis of Disability, as provided in Section 5 of the Plan, on the County website.
- Provide information on the County website about the accessibility of County facilities.
- Conduct accessibility analyses to periodically measure the accessibility of the County's websites. Consider adopting standards that meet or exceed Section 508 of the Rehabilitation Act standards for the accessibility of electronic information.
- Acquire the technological resources or staffing expertise to create accessible documents for posting on the County website.
- Assign one department the authority to provide standards and oversight for outside vendors who create webpages and for departments who post their own documents. This can support consistent and accessible web pages.

²⁶ See <https://www.ada.gov/websites2.htm>; <https://www.ada.gov/pcatoolkit/chap5toolkit.htm>

²⁷ Architectural and Transportation Barriers Compliance Board, Telecommunications Act Accessibility Guidelines, 36 CFR 1193. See also <https://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-ict-refresh/overview-of-the-final-rule>.

²⁸ DOJ, Title II Regulations Subpart A § 35.160 General

Telephones and Other Communications Devices

Even with the proliferation of cell phones, texting, and instant messaging, provision of alternative communication technologies such as text telephones (TTY), telecommunication display devices (TDDs), or telephone or video relay services (TRS) is still required for conducting communications with the public.²⁹

Required Actions

1. Ensure that staff members are proficient in the use of alternative communication technologies such as TTY, TDDs, or TRS, or are able to direct members of the public to knowledgeable staff.³⁰
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.³¹

Recommended Actions

- Explore options for Video Remote Interpreting Services (VRI) for communicating with people who are deaf, have hearing loss, or speech disorders. There are many situations where a live interpreter is required, such as in medical situations, but VRI can be a convenient, flexible, lower-cost alternative to live interpreters.

²⁹ See <https://www.ada.gov/pcatoolkit/chap3toolkit.htm>

³⁰ DOJ, Title II Regulations Subpart A § 35.161 Telecommunications

³¹ DOJ, Title II Regulations Subpart A § 35.161 Telecommunications; § 35.163 Information and signage

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 staff that interface with the public, whether in person, online, or over the telephone.

Required Actions

1. Ensure that County staff members are knowledgeable about providing accessible services, programs, and activities to the public, and the importance of maintaining accessible facilities in working order.³²

Recommended Actions

- Provide all County staff with ongoing awareness and sensitivity training.
- Develop a comprehensive disability access training program. Educate County staff about their responsibilities under the ADA. The County's ADA Coordinator, functional area analysts, or department supervisors should be responsible for ensuring that staff members receive training. Staff members who have extensive contact with the public should receive additional training about the process of providing modifications and assistive devices to make their programs, activities, and services accessible. Ensure that training also includes information about responding to a variety of disabilities and the availability of program-specific adaptations, assistive devices, and modifications.
- Develop standard guidelines for training materials. These guidelines should include standard language that appropriately describe the County's policy on inclusion and nondiscrimination. Staff members should receive training in using the guidelines effectively.
- Offer training to staff that has contact with the public and wish to learn basic American Sign Language (ASL) communication skills. Training should emphasize basic communication and should not be viewed as a substitute for utilizing qualified ASL interpreters when requested.
- Train maintenance staff regarding accessibility compliance and the fundamentals of building codes to maintain facilities in an accessible condition.
- Incorporate assistance for people with disabilities into training for building evacuation procedures.

³² DOJ, Title II Regulations Subpart A § 35.160 General; §35.130 General prohibitions against discrimination

Program Participation

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

Required Actions

1. Include individuals with disabilities in regular programs without requiring the use of different or separate aids, benefits, or services, even if they are as effective as those provided to other individuals.³⁴
2. Provide reasonable modifications to program participants with disabilities to include them in regular programs to the maximum extent possible.³⁴
3. 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.³⁴
4. Ensure that when the County determines it necessary to exclude or limit the participation of people with disabilities to ensure the safe operation of programs or services, those determinations are based on real risks, not on speculation, stereotypes, or generalizations.³⁴

Recommended Actions

- Increase outreach to people with disabilities and the organizations that serve them to ensure program accessibility. The County should also inform the public of the possible modifications that can be provided to make programs, services, and activities accessible.

³³ DOJ, Title II Regulations Subpart A § 35.164 Duties

³⁴ DOJ, Title II Regulations Subpart A § 35.130 General prohibitions against discrimination

Public Meetings

Public meetings are a regular occurrence for public agencies. The main objective of any public meeting is to impart and solicit information on public issues of importance to the County. Where these meetings are held is an important consideration in satisfying ADA requirements.

Required Actions

1. Provide agendas and other meeting materials in alternative formats upon request.³⁵
2. Provide flexibility in the time limit on speaking for individuals with communication difficulties.³⁵
3. Provide assistive listening devices available for public meetings where the sound at the meeting is amplified.³⁶

Recommended Actions

- Display a notice on meeting agendas indicating the availability of accessibility modifications for meeting materials and other elements of meeting participation.
- Prepare a list of accessible meeting spaces to facilitate the scheduling of meetings or the relocation of meetings as needed upon request.
- Move disability-related agenda items to the beginning of agendas when possible. Some people with disabilities are unable to stay late at meetings because they use transit, have fixed schedules, and/or need to use personal care attendants.
- Maintain a list of on-call ASL interpreters who can attend meetings upon request to assist individuals who are deaf or have hearing loss.
- Develop a checklist and provide instruction to staff on ensuring the accessibility of meetings. Guidelines should include examples of the types of modification requests that may be made by people with different types of disabilities, including assistive listening systems, sign language interpreters, readers, descriptive services, and other assistive technologies like real-time captioning. Other considerations include the layout of the room and the locations of the sign-in and refreshments tables, bathrooms, and other elements to ensure these features are accessible.
- Assign a member of staff as a greeter at public meetings and events. Identify this person as a resource for people who may require assistance.

³⁵ DOJ, Title II Regulations Subpart A § 35.160 General

³⁶ DOJ, Title II Regulations Subpart A § 35.160 General; 2010 Standards 219.2 Required Systems

Transportation Services

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

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.³⁸

Recommended Actions

- Periodically review transportation programs to proactively ensure accessibility. Develop strategies for modifications as appropriate.

Tours and Trips

Many public agencies provide or facilitate tours and trips as part of their programs. Napa County staff identified various tours provided by the County, particularly relating to tours of facilities such as fire stations. These tours and trips are subject to title II regulations. The County is responsible for ensuring that tours or trips can be experienced by people with disabilities by making modifications upon request.

Required Actions

1. Modify tours and trips, upon request, to enable people with mobility, visual, speech, hearing, and cognitive disabilities to participate.³⁹

Recommended Actions

- Incorporate opportunities to request accessibility modifications in registration materials for tours or trips.
- Provide information to participants in advance of a tour or trip regarding the destination, transportation method, and other characteristics of the activity so that informed requests for modifications can be made.
- Evaluate the destination of tours or trips and the means of transportation to determine accessibility and any modifications that may be required. If a tour route or a portion of a route is inaccessible and modifications are requested, continue the practice of rerouting the tour or providing program modifications that will allow the tour to be experienced (for example: photographs, videos with closed captioning).

³⁷ Title 49, Subtitle A, Part 38 - Americans with Disabilities Act Accessibility Specifications for Transportation Vehicles. See specifications at <https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=2efb7bdb786c2e63145ea6e1cf788693&mc=true&r=PART&n=pt49.1.38>

³⁸ DOJ, Title II Regulations Subpart A § 35.130 General prohibitions against discrimination; Title 49, Subtitle A, § 38.1 Purpose

³⁹ DOJ, Title II Regulations Subpart A § 35.130 General prohibitions against discrimination

Contracting, Licensing, or Other Arrangements

Many public agencies rely on the use of contractors, licensees, consultants, and other entities for the delivery of services. These entities are considered an extension of the County's 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.⁴⁰

Recommended Actions

- Ensure contractors, licensees, and other entities providing services to the public are aware of their obligation to make County programs and activities accessible.
- Monitor public programs and activities provided by contractors, licensees, and other entities to ensure continued accessibility.
- Provide a checklist and information to inform contractors, licensees, and other entities who provide services to the public of their responsibility for accessibility under the ADA.

Emergency Evacuation Planning and Procedures

Life and safety protocols and procedures are required to include plans for people with disabilities.⁴¹ The County is responsible for ensuring that staff are aware of these procedures and are trained to implement them during an emergency. Issues that have the greatest impact on people with disabilities include:

- Notification;
- Evacuation;
- Emergency transportation;
- Access to medications, refrigeration, and back-up power;
- Access to their mobility devices or service animals while in transit; and
- Access to information.

⁴⁰ DOJ, Title II Regulations Subpart A § 35.130 General prohibitions against discrimination

⁴¹ See <https://www.ada.gov/pcatoolkit/chap7emergencymgmt.htm>

Required Actions

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

Recommended Actions

- Incorporate the following elements into emergency planning:
 - Address what to do when an alarm is triggered;
 - Establish meeting places for assistance and evacuation chairs;
 - Provide direction on what to do if assistance is not available; and
 - Establish floor captains.
- Test the County's emergency plan by enlisting people with different disabilities to role-play during emergency simulations.
- Test the County's emergency evacuation procedures with periodic drills, both announced and unannounced.
- Review and update existing procedures dealing with emergencies to ensure that people with disabilities can be alerted and that they can alert emergency service providers.
 - Review suggestions for evacuation plans and procedures on the U.S. Access Board website at <http://www.ada.gov/emergencyprepguide.htm>.
 - Review suggestions for evacuation plans and procedures provided by the federal government, such as the "Procedures for Employees with Disabilities in Office Occupancies" document published by FEMA and the U.S. Fire Administration.
- Work with disability organizations to explore the use of technologies such as audible exit signs for orientation and direction or vibrating paging systems.
- Provide training for key public safety personnel to enable them to communicate in basic ASL if there is an emergency condition. For example, this training could be provided to first responders and triage personnel involved in post-disaster emergencies.
- Ensure that emergency teams are aware of people with disabilities in their communities who may require special assistance in an emergency.
- Provide ASL interpreters at emergency facilities on an as-needed basis. To accomplish this, form a pool of interpreters as a resource from which to draw upon.

⁴² 42 U.S.C. § 12132; see generally, DOJ, Title II Regulations Subpart A § 35.130, § 35.149

Facilities

County facilities should be accessible to people with different types of disabilities. The identification of structural barriers in County facilities and public right-of-way is a required element of accessibility. This subsection and its recommendations address the programmatic aspects of facility accessibility. Section 3 and Section 4 of the Plan addresses the physical aspects of facility accessibility.

Required Actions

1. Ensure that interested people can obtain information regarding the existence and location of accessible facilities and elements within facilities.⁴³

Recommended Actions

- Provide information about the accessibility of County-owned and operated facilities on department publications, including department websites.
- Provide information about the accessibility of non-County facilities hosting County programs and services.
- Provide information about the accessibility of County-owned facilities that are leased to other entities.
- Record and monitor requests relating to facility access. The ADA Coordinator can analyze accessibility requests periodically to look for global issues that can be addressed and problems that can be solved proactively.

Special Events and Private Events on Public Properties

All events on public property should be accessible to people with disabilities. When the County rents or allows use of its properties to a third party for special events, the responsibility for maintaining an accessible environment is temporarily deferred to the tenant.

Required Actions

1. Maintain County facilities in an accessible order to help ensure the accessibility of events held by public and private organizations.⁴⁴

Recommended Actions

- Inform private organizations that sponsor events at County facilities of applicable ADA requirements.
- Provide a checklist and information during the application process to inform organizers of their responsibility for accessibility under the ADA.

⁴³ DOJ, Title II Regulations Subpart A § 35.163 Information and signage

⁴⁴ DOJ, Title II Regulations Subpart A § 35.133 Maintenance of accessible features

3 Napa County Transition Plan

Title II of the ADA requires that public entities having responsibility for or authority over facilities, streets, sidewalks, and/or other areas meant for public use develop a transition plan to ensure their facilities meet the standards for program accessibility. Program accessibility means that a program, activity, or service provided to the public is accessible when viewed in its entirety. Simply put, a transition plan assists in turning inaccessible facilities into accessible environments usable by individuals with disabilities.

The process of developing an ADA transition plan includes the identification of access barriers within the built environment. The transition plan must:

- Identify the barriers to program access;
- Identify the specific barrier removal action(s);
- Identify a schedule for barrier removal; and
- Identify the employee or employees responsible for ensuring barrier removal.

The County's transition plan is organized into two parts: buildings and sites and the public right-of-way, which includes curb ramps, sidewalks, and pedestrian activated signals under the County's maintenance responsibility.

3.1 Schedule for Facility Improvements

Title II regulations state that if a transition plan will take more than one year to fully implement, it must contain interim steps to provide program accessibility. Based on a diligent effort by County staff, the Plan proposes a preliminary 15-year strategy for removing barriers at County buildings and within the public right-of-way. The barrier removal strategy for the next 15 years incorporates flexibility in the process and allows the County to respond to new opportunities as they arise. The County's ADA Coordinator will be responsible for ensuring barrier removal. The County reserves the right to modify barrier removal priorities to allow flexibility in accommodating community requests, petitions for reasonable modifications from people with disabilities, changes in County programs, and funding opportunities and constraints. For the most current status of the remediation of barriers, contact the County's ADA Coordinator.

3.2 Accessibility Standards

At the time of the building, site, and right-of-way evaluations, the 2010 ADA Standards, 2016 California Access Compliance Advisory Reference Manual, commonly referred to as the California Building Code (CBC), 2015 Architectural Barriers Act Standards Chapter 10 Recreation Facilities (2015 ABA), 2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (2011 PROWAG), and the 2014 California Manual on Uniform Traffic Control Devices for Streets and Highways (2014 CA MUTCD) were used to identify barriers at County facilities. Building codes and standards are revised every few years. The barrier evaluations conducted provide an assessment of current conditions as viewed by current code and provide a baseline for future barrier removal.

3.3 Building and Site Evaluations

Evaluations of County buildings and sites included all portions of exterior and interior features used by the public. The assessment identified physical barriers at each facility based on the 2010 ADA Standards, 2016 CBC, and 2015 ABA the inventory of facilities evaluated is listed on the following page. Summaries of the barriers identified are included with this document as Appendix B: ADA Barrier Analysis Summary Report. The site evaluations were accomplished using a consultant team equipped with measuring devices, County facility information, and evaluation checklists. Diagrams and maps of each site were annotated during the evaluation process and are included with the ADA Facility Assessments Reports.⁴⁵ The elements included in the evaluations are as follows:

- | | | |
|----------------------|------------------------|----------------------|
| • Built-in Elements | • Outdoor Constructed | • Program Specific** |
| • Doors/Gates | Features | • Restrooms |
| • Drinking Fountains | • Parking Areas | • Rooms |
| • Elevators | • Paths of Travel* | • Signs |
| • Hazards | • Picnic Areas | • Telephones |
| • Other Features | • Play Equipment Areas | |

* Paths of travel encompass corridors/aisles, curb ramps, ramps, stairways, trails, and walks.

**Program specific barriers include features that are typically unique to certain facilities, such as bathing facilities, eating areas, judicial facilities, kitchens, and libraries.

⁴⁵ The ADA Facility Assessment Reports are available under separate cover by contacting the County's ADA Coordinator. They are a snapshot of the facility at the time of evaluation and do not reflect the dates or history of construction or alterations of County facilities. In some cases, the items contained in the reports are not required to be remediated because those items were compliant at the time of construction or alteration, or other options are available to the County to provide similar accessible programs, activities, and services. The reports do not necessarily reflect actions that the County must undertake, but rather constitute a list of elements that were not consistent with accessibility standards current at the time of the evaluation.

County Facilities Evaluated

The facilities listed below are organized by the County's five functional areas: Community Resources, General Administration and Finance, Human Services, Law and Justice, and Public Safety.

Community Resources:

- Agricultural Commissioner
- American Canyon Library
- Animal Shelter
- Calistoga Library
- Fifth Street Garage
- Flood Control District
- Napa County Airport
- Napa Library
- Yountville Library

General Administration and Finance:

- Administration Building
- ITS

Human Services:

- ADS Residential Program
- Child Welfare Services – Nexus
- HHSA American Canyon
- HHS Calistoga (Self-Sufficiency, ADS, CSOA)
- HHSA People Empowering People
- HHSA Self-Sufficiency Pear Tree
- Homeless Shelter
- Innovations Community Center
- Mental Health – Avenues (NSH)
- Mental Health – Bella House
- South Campuses A & B

Law and Justice:

- 1127 1st
- Grand Jury
- Hall of Justice
- Historic Courthouse
- Juvenile Courthouse
- Juvenile Justice Center
- Probation – ERC

Public Safety:

- Capell Valley Fire Station
- Dry Creek Fire Station
- Greenwood Fire Station
- Napa County Sheriff
- Yountville Fire Station

Other:

- Cuttings Wharf

Barrier Categorization

The removal of accessibility barriers is guided by a categorization process referenced in the ADA regulations. The principle is to ensure that basic access is provided, access to activities is provided, amenities are accessible, and alternatives to architectural modifications are allowed when appropriate. The categorization process includes the following programmatic categories:

- **Category 1** identifies barriers that affect accessibility at the entrance to a facility, or a pedestrian route to the portion of a facility where program activities take place (for example: parking, walks, ramps, stairs, doors).
- **Category 2** identifies barriers that affect accessibility of program use areas (for example: trails, transaction counters, conference rooms, public offices, restrooms).
- **Category 3** identifies barriers that affect access to amenities serving program areas (for example: drinking fountains, telephones, site furnishings, vending machines).
- **Category 4** identifies areas or features that may not be required to be modified for accessibility (for example: a pathway that does not connect to an accessible feature, an area where no public programs or activities occur, or the program or activity provided at this location is available in an accessible location).

This categorization was applied to each identified barrier at County building and sites. Some barriers will require further evaluation by County staff for programmatic solutions. These barriers were assigned two category values (for example: 2 or 4), indicating the barrier will need to be assigned one of the values but not both.

Priorities for Barrier Removal at Buildings and Sites

To develop a phasing schedule for the removal of barriers at the County's facilities, prioritization criteria were developed with input from the ADA focus group and meetings with County staff. All facilities in which the County provides programs, activities, and services were reviewed based on the following criteria:

- **Level of Use by the Public:** County facilities that receive a high level of public use.
- **Program Uniqueness:** County programs that are unique to a building, facility, or population and cannot occur at another location.
- **Geographic Distribution:** County services, programs, and activities that are provided at facilities distributed throughout the County.
- **Public Gathering and Meeting Spaces:** Facilities that are used by the community and County for public meetings, special events, and gatherings.
- **Community Rights and Responsibilities:** Facilities where services are provided to exercise citizen rights—participation in Board of Supervisor and Commission meetings, access to elected officials, where taxes are paid, permits and licenses are obtained, etc.
- **Identified Accessibility Needs:** County facilities where there have been accessibility complaints.

Based on the outcomes of the discussions with the focus group and staff, the following criteria were applied to facilities within each of the County's functional areas.

	Community Resources/ Infrastructure	General Administration and Finance	Human Services	Law and Justice	Public Safety
Level of Use by the Public	●	●	●	●	●
Program Uniqueness			●	●	●
Geographic Distribution			●		
Public Gathering and Meeting Spaces		●		●	●
Community Rights and Responsibilities	●	●		●	●
Identified Accessibility Needs	●	●	●	●	●

Phasing Schedule for Building and Site Facility Improvements

The Plan proposes a 15-year strategy for removing barriers at County facilities. Barriers will be removed systematically based on established program priorities. It is the intent of the County to address and remove barriers to accessibility based on the need for programmatic access.

Title II regulations state that if a transition plan will take more than one year to fully implement, it must contain interim steps to provide program accessibility. During the development of the Plan, the County focused on completing cost-effective repairs and alterations to remove the highest percentage of access barriers within a short timeframe. Additionally, interim measures are being explored and implemented to provide better access for the public pending the implementation of major physical barrier removal projects. Potential interim measures include:

- Relocation of a program to an accessible facility;
- Installation of directional signs;
- Installation of a power door or lift;
- Adjustments to operating mechanisms;
- Temporary modifications that increase access; or
- Other actions that enable better access.

The County will accomplish barrier removals in its buildings and sites either through policy and procedure modifications to remove programmatic barriers, or maintenance and construction projects to remove structural barriers.

The strategy is summarized in tables on the following pages. It is the County's intent to review all barriers during the first three years of the Plan's implementation and address those barriers that can be resolved through programmatic modifications and maintenance tasks. The County will then revise the schedule for removal of the remaining barriers. It is also assumed that as facility barriers are evaluated in greater detail as part of future projects or possible complaints, a percentage of the barriers will fall within the safe harbor provisions, explained in Section 4 of the Plan. The County will then revise and update the inventory of barriers and, when applicable, revise the schedule for the removal of remaining barriers.

The information contained in the ADA facility assessment reports has been incorporated into a barrier analysis Excel workbook with companion facility GIS data, which is intended to be the living transition plan and the County's ongoing record of the remediation of barriers. The tracking tool will be updated over time as the County removes barriers or finds programmatic solutions to barriers. The Excel workbook and corresponding GIS data are maintained by the County's ADA Coordinator. For the current status of the remediation of barriers, contact the ADA Coordinator at adacoordinator@countyofnapa.org.

The schedules that follow summarize the priorities for barrier removal at County facilities. These schedules incorporate the priorities for barrier removal in conjunction with the barrier categorizations. The tables are organized by the County's functional areas and represent a 15-year plan for barrier removal split into five-year planning increments. Taking into consideration that not all barriers require the same level of effort to mitigate, the timeline for barrier removal is organized into three categories: maintenance projects, small capital projects, and large capital projects.

- **Maintenance Projects:** Mitigation of a barrier as part of ongoing maintenance or possibly without a building permit. Example: Changing door hardware from a knob to accessible lever hardware; remounting a fixed unit to appropriate reach range heights, such as a paper towel dispenser.
- **Small Capital Projects:** Barrier mitigations that require individual study under the guidance of a design professional and have a small scope and cost.
- **Large Capital Projects:** Barrier mitigations that require individual study under the guidance of a design professional and may require extended planning and funding.

The County intends to complete as many maintenance items as possible in the first five years of the Plan's implementation.

Phasing Schedule Summaries

Table 3-1: Schedule Community Resources⁴⁶

Facility	Years 1-5	Years 6-10	Years 11-15
Agricultural Commissioner			
<i>Maintenance Projects</i>	●	●	
<i>Small Capital Projects</i>		●	
<i>Large Capital Projects</i>			●
American Canyon Library			
<i>Maintenance Projects</i>	●	●	
<i>Small Capital Projects</i>		●	●
<i>Large Capital Projects</i>			●
Animal Shelter			
<i>Maintenance Projects</i>	●		
<i>Small Capital Projects</i>		●	●
<i>Large Capital Projects</i>			●
Calistoga Library			
<i>Maintenance Projects</i>	●	●	
<i>Small Capital Projects</i>			
<i>Large Capital Projects</i>			
Fifth Street Garage			
<i>Maintenance Projects</i>	●	●	
<i>Small Capital Projects</i>		●	
<i>Large Capital Projects</i>			●
Flood Control District			
<i>Maintenance Projects</i>	●		
<i>Small Capital Projects</i>			●
<i>Large Capital Projects</i>			●
Napa County Airport			
<i>Maintenance Projects</i>	●		
<i>Small Capital Projects</i>			●
<i>Large Capital Projects</i>			●

⁴⁶ The most current information on the status of all barrier identification and mitigation is contained in the County's ADA Barrier Analysis Tool maintained by the ADA Coordinator.

Napa Library			
<i>Maintenance Projects</i>	●		
<i>Small Capital Projects</i>		●	
<i>Large Capital Projects</i>		●	
Yountville Library			
<i>Maintenance Projects</i>	●	●	
<i>Small Capital Projects</i>		●	
<i>Large Capital Projects</i>		●	

Table 3-2: Schedule General Administration and Finance

Facility	Years 1-5	Years 6-10	Years 11-15
Administration Building			
<i>Maintenance Projects</i>	●		
<i>Small Capital Projects</i>	●	●	
<i>Large Capital Projects</i>		●	
ITS			
<i>Maintenance Projects</i>	●		
<i>Small Capital Projects</i>		●	
<i>Large Capital Projects</i>			●

Table 3-3: Schedule Human Services

Facility	Years 1-5	Years 6-10	Years 11-15
ADS Residential Program			
<i>Maintenance Projects</i>	●		
<i>Small Capital Projects</i>			●
<i>Large Capital Projects</i>			●
Child Welfare Services - NEXUS			
<i>Maintenance Projects</i>	●		
<i>Small Capital Projects</i>		●	
<i>Large Capital Projects</i>			●

HHSA American Canyon			
<i>Maintenance Projects</i>	●		
<i>Small Capital Projects</i>		●	
<i>Large Capital Projects</i>		●	
HHSA Calistoga (Self-Sufficiency, ADS, CSOA)			
<i>Maintenance Projects</i>	●		
<i>Small Capital Projects</i>		●	
<i>Large Capital Projects</i>			
HHSA People Empowering People			
<i>Maintenance Projects</i>	●	●	
<i>Small Capital Projects</i>			
<i>Large Capital Projects</i>			
HHSA Self-Sufficiency Pear Tree			
<i>Maintenance Projects</i>	●		
<i>Small Capital Projects</i>		●	
<i>Large Capital Projects</i>		●	
Homeless Shelter			
<i>Maintenance Projects</i>	●		
<i>Small Capital Projects</i>		●	
<i>Large Capital Projects</i>			
Innovations Community Center			
<i>Maintenance Projects</i>	●		
<i>Small Capital Projects</i>		●	●
<i>Large Capital Projects</i>			●
Mental Health – Avenues (NSH)			
<i>Maintenance Projects</i>	●		
<i>Small Capital Projects</i>			●
<i>Large Capital Projects</i>			●
Mental Health – Bella House			
<i>Maintenance Projects</i>	●		
<i>Small Capital Projects</i>		●	
<i>Large Capital Projects</i>		●	
South Campuses A & B			
<i>Maintenance Projects</i>	●		
<i>Small Capital Projects</i>	●		
<i>Large Capital Projects</i>		●	

Table 3-4: Schedule Law and Justice*

Facility	Years 1-5	Years 6-10	Years 11-15
1127 1st			
<i>Maintenance Projects</i>	●		
<i>Small Capital Projects</i>		●	
<i>Large Capital Projects</i>			●
Grand Jury			
<i>Maintenance Projects</i>	●		
<i>Small Capital Projects</i>		●	
<i>Large Capital Projects</i>			●
Hall of Justice			
<i>Maintenance Projects</i>	●		
<i>Small Capital Projects</i>		●	
<i>Large Capital Projects</i>			●
Historic Courthouse			
<i>Maintenance Projects</i>	●		
<i>Small Capital Projects</i>			●
<i>Large Capital Projects</i>			●
Juvenile Courthouse			
<i>Maintenance Projects</i>	●		
<i>Small Capital Projects</i>	●		
<i>Large Capital Projects</i>		●	
Juvenile Justice Center			
<i>Maintenance Projects</i>	●		
<i>Small Capital Projects</i>		●	
<i>Large Capital Projects</i>		●	
Probation-ERC			
<i>Maintenance Projects</i>	●		
<i>Small Capital Projects</i>		●	
<i>Large Capital Projects</i>		●	

*An ADA Transition Plan Update for the County's Adult Detention Facility was completed in 2013. The County is actively working on the implementation of this plan. For the current status of this plan, contact the ADA Coordinator at adacoordinator@countyofnapa.org.

Table 3-5: Schedule Public Safety

Facility	Years 1-5	Years 6-10	Years 11-15
Capell Valley Fire Station			
<i>Maintenance Projects</i>	●		
<i>Small Capital Project</i>		●	
<i>Small Capital Project</i>			
Dry Creek Fire Station			
<i>Maintenance Projects</i>	●		
<i>Small Capital Project</i>		●	
<i>Small Capital Project</i>			●
Greenwood Fire Station			
<i>Maintenance Projects</i>	●		
<i>Small Capital Project</i>		●	
<i>Small Capital Project</i>			●
Napa County Sheriff			
<i>Maintenance Projects</i>	●		
<i>Small Capital Project</i>		●	
<i>Small Capital Project</i>			●
Yountville Fire Station			
<i>Maintenance Projects</i>	●		
<i>Small Capital Project</i>		●	
<i>Small Capital Project</i>			●

Table 3-6: Schedule Other

Facility	Years 1-5	Years 6-10	Years 11-15
Cuttings Wharf			
<i>Maintenance Projects</i>	●		
<i>Small Capital Project</i>		●	
<i>Small Capital Project</i>		●	

3.4 Public Right-of-Way

The ADA does not mandate the installation of sidewalks but does require curb ramps at intersections where an existing sidewalk intersects the roadway. In 2002, the United States Court of Appeals for the Ninth Circuit, whose jurisdiction includes California, held for the first time that sidewalks constitute a service, program, or activity of a public entity. Sidewalks are, therefore, subject to the ADA's program accessibility regulations.⁴⁷ Prior to this decision, the law was unclear about whether transition plans for public entities should address barrier removal from sidewalks. When originally written, the ADA specifically addressed curb ramps; this court decision added sidewalks.

Under title II, the County is not necessarily required to construct curb ramps at every point where a sidewalk intersects a curb, rather traffic safety considerations may make construction of ramps undesirable at some locations. Alternative routes to buildings that make use of existing curb ramps may be acceptable under the concept of program accessibility where individuals with disabilities need only travel a marginally longer route.

Roadway Alterations and Maintenance: Triggers for Barrier Removals

The DOJ, in coordination with the U.S. Department of Transportation, specifies that public entities are required to provide curb ramps or upgrade curb ramps whenever roadways are altered. An alteration is a change that affects or could affect the usability of all or part of a building or facility.⁴⁸ Alterations of streets, roads, or highways include activities such as reconstruction, rehabilitation, resurfacing, widening, and projects of similar scale and effect.⁴⁹ Maintenance activities such as filling potholes are not alterations and do not trigger barrier removal.⁵⁰ The following lists distinguish between roadway alterations and maintenance.

Alteration

- Addition of new layer of asphalt
- Cape seals
- In-place asphalt recycling
- Microsurfacing and thin lift overlay
- Mill and fill / mill and overlay
- New construction
- Open-graded surface course
- Rehabilitation and reconstruction
- Resurfacing of a crosswalk

⁴⁷ Barden v. City of Sacramento, 292 F.3d 1073 (9th Cir. 2002)

⁴⁸ DOJ, Title II Regulations Subpart D § 35.151(b)(1) Alterations

⁴⁹ 2010 ADA Standards, 106.5

⁵⁰ July 8, 2013 DOJ/Department of Transportation Joint Technical Assistance on the Title II of the Americans with Disabilities Act Requirements to Provide Curb Ramps when Streets, Roads, or Highways are Altered through Resurfacing.

Maintenance

- Chip seals
- Crack filling and sealing
- Diamond grinding
- Dowel bar retrofit
- Fog seals
- Joint crack seals
- Joint repairs
- Pavement patching
- Painting or striping
- Scrub sealing
- Slurry seals
- Spot high friction treatments
- Surface sealing

The County intends to replace all curb ramps under its maintenance responsibility during roadway alteration projects.

Public Right-of-Way Evaluations

Right-of-way facilities were evaluated in 2017 using criteria from the 2010 ADA Standards, 2016 CBC, 2011 PROWAG, and 2014 CA MUTCD. The evaluations of public right-of-way facilities included curb ramps, sidewalks, and pedestrian signals.

Phasing Schedule for Public Right-of-Way Improvements

The County proposes a 15-year strategy for the removal of barriers in the public right-of-way. Opportunities for funding the removal of these access barriers include:

- Projects for new construction;
- Projects for roadway alterations;
- Maintenance and repair projects and programs;
- Dedication of a fund for ADA barrier removal;
- Requirements for private developers to remove access barriers when development affects facilities within the right-of-way; and
- Grant funding specific to the removal of access barriers, when available.

The County currently has a pavement management program that schedules roadway rehabilitation and maintenance over a rolling five-year schedule. The County plans to review public right-of-way barriers during the implementation of the Plan and address those barriers that can be resolved as part of the on-going pavement maintenance and rehabilitation program. As part of the review, the County will revise the schedule for the removal of barriers. The transition plan schedule will also be updated as new construction and roadway alteration projects arise.

Public Right-of-Way Prioritization

The draft schedule for removing barriers in the County's public right-of-way was developed using guidelines identified in title II. Based on these guidelines, the prioritization criteria for removal of barriers in the right-of-way include the following:

- Locations of citizen complaint or request (ADA title II program access);
- Locations serving government offices and public facilities;
- Locations serving transportation;
- Locations serving commercial districts and employers; and
- Locations serving other areas.

Matrices and tables on the following pages describe the three types of facilities evaluated and summarize the barrier findings as follows:

- Descriptions of the barrier categorizations;
- A matrix showing Geospatial Proximity Priorities by category; and
- Summary tables of the identified barriers.

The matrices, starting with Table 3-7, illustrate the prioritization criteria for curb ramp, sidewalk, and pedestrian signal barrier removal projects. Each evaluated facility was assigned a rank based on its barrier priority and category. The assigned priority is based on the criteria described above and the barrier category is based on the condition of the facility. The descriptions for each category are provided before each matrix.

Curb Ramp Barrier Descriptions

Category 1:

- A curb ramp is not provided in areas where there is connecting sidewalk.
- The curb ramp is significantly damaged or deteriorated and is unsafe.
- The curb ramp is built-up in the travel lane.
- There is no accessible pedestrian route to the curb ramp.
- The curb ramp has no detectable warning.

Category 2:

- Width of ramp is less than 48 inches.
- Running slope of ramp exceeds 8.33 percent or five percent for a blended transition.
- There is a grade break on the surface of the ramp.
- The curb ramp is not located within marked crossings (when present).
- A four-by-four-foot clear space at the bottom of the ramp outside of the travel lane is not provided.
- The surface of the ramp is not stable, firm, and slip resistant.

Category 3:

- Top turning space is less than four-by-four feet or constrained space is less than four-by-five feet or slope exceeds two percent.
- Cross slope of ramp exceeds two percent.
- Counter slope of the curb ramp is greater than five percent.
- Slope of ramp flared sides (if applicable) exceeds 10 percent.
- Diagonal curb ramp design without existing physical constraints.
- Detectable warning does not meet standard.

Category 4:

- No deficiencies identified.

Table 3-7: Curb Ramp Prioritization

Curb Ramps	ADA 35.150(d) Geospatial Proximity Priorities*				
	A	B	C	D	E
Categories**	Location of Citizen Complaint / Request (ADA Title II Program Access)	Location Serving Government Offices & Public Facilities	Location Serving Transportation	Location Serving Commercial Districts, Employers	Location Serving Other Areas
1	A1 High Priority	B1	C1	D1	E1
2	A2	B2 Medium Priority	C2	D2	E2
3	A3	B3 Low Priority	C3	D3	E3
4	A4	B4	C4	D4	E4

*The priorities listed under columns B, C, D, and E are specified under title II 28 CFR Section 35.150 (d).

**These categories correspond to the numbered category descriptions on the previous page.

Table 3-8: Curb Ramp Barrier Summary

Category	Priority	Total Ramps	Percent Total	Schedule Year
High Priority				
1	B1	1	1.0%	Years 1 to 5
1	C1	27	27.6%	Years 1 to 5
1	D1	36	36.7%	Years 1 to 5
Subtotal		64	65.3%	-
Medium Priority				
2	C2	7	7.1%	Years 1 to 10
2	D2	13	13.3%	Years 1 to 10
Subtotal		20	20.4%	-
Low Priority				
3	C3	2	2.0%	Years 1 to 15
3	D3	8	8.2%	Years 1 to 15
Subtotal		10	10.2%	-
No Deficiencies Identified				
4	C4	4	4.1%	n/a
Subtotal		4	4.1%	-
Total for All Projects		98	100%	-

Sidewalk Barrier Descriptions

Category 1:

- The sidewalk width is less than 48 inches.

Category 2:

- Running slope of sidewalk exceeds grade of road and is greater than five percent.
- The sidewalk has cross slopes that exceed two percent for more than half of the sidewalk segment.
- The sidewalk cross slope at driveway entries exceeds two percent.
- The sidewalk has a significant number of vertical changes that exceed a quarter-inch –and– openings greater than a half-inch or are parallel to direction of travel (more than one per 100 feet).

Category 3:

- The sidewalk has cross slopes that exceed two percent for less than half of the sidewalk segment.
- The sidewalk has a significant number of vertical changes that exceed a quarter-inch –or– openings greater than a half-inch (more than one per 100 feet), but not both.

Category 4:

- The sidewalk has overhanging or protruding objects along its route.
- The sidewalk has a significant number of vertical changes that exceed a quarter-inch and/or openings greater than a half-inch (fewer than one per 100 feet).

Category 5:

- No deficiencies identified.

Table 3-9: Sidewalk Prioritization

Sidewalks	ADA 35.150(d) Geospatial Proximity Priorities*				
	A	B	C	D	E
Categories**	Location of Citizen Complaint / Request (ADA Title II Program Access)	Location Serving Government Offices & Public Facilities	Location Serving Transportation	Location Serving Commercial Districts, Employers	Location Serving Other Areas
1	A1 High Priority	B1	C1	D1	E1
2	A2	B2	C2	D2	E2
3	A3	B3 Medium Priority	C3	D3	E3
4	A4	B4 Low Priority	C4	D4	E4
5	A5	B5	C5	D5	E5

*The priorities listed under columns B, C, D, and E are specified under title II 28 CFR Section 35.150 (d).

**These categories correspond to the numbered category descriptions on the previous page.

Table 3-10: Sidewalk Barrier Summary

Category	Priority	Total Miles	Percent Total	Schedule Year
High Priority				
1	C1	1.0	10.1%	Years 1 to 5
1	D1	0.1	1.0%	Years 1 to 5
1	C2	0.7	7.0%	Years 1 to 5
Subtotal		1.8	18.0%	-
Medium Priority				
2	D2	3.3	33.9%	Years 1 to 10
2	C3	0.1	1.5%	Years 1 to 10
3	D3	0.3	2.9%	Years 1 to 10
Subtotal		3.7	38.3%	-
Low Priority				
3	B4	0.2	1.8%	Years 1 to 15
4	C4	1.0	10.2%	Years 1 to 15
4	D4	1.9	19.5%	Years 1 to 15
Subtotal		3.1	31.5%	-
No Deficiencies Identified				
5	B5	0.05	0.5%	n/a
5	C5	0.5	5.3%	n/a
5	D5	0.6	6.4%	n/a
Subtotal		1.2	12.2%	-
Total for All Projects		9.8	100%	-

Pedestrian Signal Barrier Descriptions

Category 1:

- Accessible pedestrian signal is not provided.
- Pedestrian crossing time is insufficient.

Category 2:

- Level clear space at push button not provided.
- Reach to push button from clear space is obstructed.
- Operating force of pushbutton exceeds five pounds of force.
- The pushbutton does not have a sign adjacent to or integral with the pushbutton.
- Pushbutton sign does not clearly indicate which crosswalk signal is actuated.
- Pushbutton pilot light (if applicable) does not activate.
- A locator tone is not provided.
- A tactile arrow is not provided.
- Pushbutton locator tone activates at incorrect time.
- Pushbutton locator tone duration and intensity needs adjustment.
- Audible features of accessible pedestrian signal need adjustment.

Category 2, continued

- Speech walk message of accessible pedestrian signal needs adjustment.
- Extended pushbutton feature needs adjustment.
- Pushbutton needs color coded identification above the control button.

Category 3:

- Pushbutton locator is more than 10 feet from curb, shoulder, or pavement.
- Pushbutton is further than five feet from the crosswalk line farthest from the intersection (when applicable).
- Pushbutton height is not within range of 42 and 48 inches above the ground.
- Pushbutton and arrow are not parallel with the direction of travel.
- Distance between two pushbuttons on the same corner is less than 10 feet.

Category 4:

- No deficiencies identified.

Table 3-11: Pedestrian Signal Prioritization

Pedestrian Signals	ADA 35.150(d) Geospatial Proximity Priorities*				
	A	B	C	D	E
Categories**	Location of Citizen Complaint / Request (ADA Title II Program Access)	Location Serving Government Offices & Public Facilities	Location Serving Transportation	Location Serving Commercial Districts, Employers	Location Serving Other Areas
1	A1 High Priority -----	B1	C1	D1	E1
2	A2	B2 Medium Priority -----	C2	D2	E2
3	A3	B3	C3	D3 Low Priority -----	E3
4	A4	B4	C4	D4	E4

*The priorities listed under columns B, C, D, and E are specified under title II 28 CFR Section 35.150 (d).

**These categories correspond to the numbered category descriptions on the previous page.

Table 3-12: Pedestrian Signal Barrier Summary

Category	Priority	Total Signals	Percent Total	Schedule Year
High Priority				
1	C1	5	38.5%	Years 1 to 5
Subtotal		5	38.5%	-
Medium Priority				
1	D1	4	30.8%	Years 1 to 5
1	E1	4	30.5%	Years 1 to 5
Subtotal		8	61.6%	-
Total for All Projects		13	100%	-

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4 Barrier Removal Considerations for Plan Implementation

The County will accomplish barrier removals through two strategies: policy and procedure modifications to remove programmatic barriers and maintenance and construction projects to remove structural barriers. Title II requires a public entity to “operate each service, program or activity so that the service, program or activity, when viewed in its entirety, is readily accessible to and usable by individuals with disabilities.” This requirement does not:

- Necessarily require a public entity to make each of its existing facilities accessible to and usable by individuals with disabilities;
- Require a public entity to take any action that would threaten or destroy the historic significance of an historic property; or
- Require a public entity to take an action that it can demonstrate would result in a fundamental alteration in the nature of a service, program, or activity or impose undue financial and administrative burdens.

4.1 Triggers for Barrier Removal

The County’s ADA Coordinator is responsible for ensuring barrier removal. There are two conditions that determine when barriers must be removed: to provide access to programs, activities, and services, and when a facility is altered.

Program Accessibility

A public entity must ensure that individuals with disabilities are not excluded from services, programs, and activities because existing buildings are inaccessible. When viewed in their entirety, services, programs, and activities must be readily accessible to and usable by individuals with disabilities. This is known as program accessibility,⁵¹ and applies to facilities of a public entity that existed on January 26, 1992. Public entities do not necessarily have to make each of their existing facilities accessible.

Alterations

The County is required to remove physical barriers when it alters a facility. Alterations are defined as “a change in a building or facility that affects or could affect the usability of a building or facility or portion thereof.”⁵² Many types of projects are considered *alterations*, including remodeling, renovation, rehabilitation, reconstruction, restoration, resurfacing of circulation paths or vehicular ways, and changes or rearrangement of structural parts, elements, or walls. Normal maintenance such as reroofing, painting or wallpapering, or changes to mechanical and electrical systems are not considered alterations unless they affect a facility’s

⁵¹ DOJ, Title II Regulations Subpart D §35.151(b) Existing facilities

⁵² 2010 ADA Standards §106.5 Defined Terms

usability. For example, a project limited to an HVAC system would not affect the usability or occupancy of a facility and would not constitute an alteration that would trigger path of travel upgrades tied to that alteration.

Where alterations are performed solely for the purpose of barrier removal, they will not trigger additional path of travel improvements.⁵³ The ADA and CBC standards ensure that the opportunities for accessibility presented by an alteration are taken. How and to what extent the standards apply is determined by the scope of a project and the elements and spaces altered. Only those elements or spaces altered are required to comply, but alterations made to areas containing a primary function (a major activity for which a facility is intended) also require an accessible path of travel.

When altering a primary function area, the ADA requires that existing barriers on the path of travel to this area must be removed to the maximum extent that is technically feasible. Path of travel elements are restrooms, doors, telephones, drinking fountains, the route itself, and several other items. The expense for making these additional elements accessible is considered disproportionate if it exceeds 20 percent of construction costs. Therefore, the additional amount an agency is required to spend over the construction costs for path of travel improvements would be a maximum of 20 percent. The following is a rank-ordered list of priorities for making improvements to path of travel element:

1. An accessible entrance,
2. An accessible route to the altered area,
3. At least one accessible restroom for each gender or a single gender-neutral restroom,
4. Accessible telephones,
5. Accessible drinking fountains, and
6. When possible, additional accessible elements such as parking, storage, and alarms.

The CBC does not allow this 20 percent ceiling if construction costs are greater than the current year's valuation threshold. The 2019 valuation threshold is \$166,157; however, this amount is subject to annual increases. If the construction budget exceeds the valuation threshold (computed over a three-year period), then all path of travel elements supporting the area of renovation are required to be made accessible regardless of cost. Therefore, the additional amount an agency is required to spend on construction costs for path of travel improvements is limited to 20 percent if construction costs are below the current valuation threshold. However, if construction costs exceed the valuation threshold, then all supporting path of travel elements need to be made accessible. Additional information about California's valuation threshold is included in the Section 7 of the Plan.

⁵³ DOJ, Title II Regulations Subpart D § 35.151(b) Alterations; 11B-202.4 Path of travel requirements in alterations, additions and structural repairs. Also see *State and Local Government Facilities: Guidance on the Revisions to 28 CFR 35.151 in Guidance on the 2010 ADA Standards for Accessible Design* <https://www.ada.gov/regs2010/2010ADAStandards/Guidance2010ADASTandards.htm#titleII>.

The County is not required to remove barriers identified within a County-owned facility as part of the transition plan:

- Where programmatic modifications can be made to provide an equivalent experience,
- Where there are nearby and available equivalent accessible features,
- Where there are no public programs or activities provided at that portion of the site, or
- When safe harbor conditions are met.

In an alteration or new construction project, the County must incorporate accessibility standards to the maximum extent feasible.⁵⁴ It is possible that the accessibility of a planned alteration is technically infeasible, that is, some accessibility efforts are unlikely to be accomplished because of existing physical or site constraints.⁵⁵ Where technical infeasibility is encountered, compliance with accessibility standards is still required to the maximum extent technically feasible.⁵⁶

Safe Harbor Provisions⁵⁷

The 2010 ADA Standards introduced the concept of safe harbor, a new exception that allows facilities built prior to March 15, 2012 in compliance with the 1991 ADA Standards to remain as-is until alterations to the structural features are undertaken. For example, the 1991 ADA Standards allowed a maximum of 54 inches for a side reach range, while the 2010 ADA Standards lowered this to a maximum of 48 inches. Items built prior to March 15, 2012 that are positioned at 54 inches would fall under the safe harbor provision until the time of planned alterations.⁵⁸

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.⁵⁹

⁵⁴ DOJ, Title II Regulations Subpart D §35.151(b) Existing facilities

⁵⁵ Access Board. "Guide to the ADA Standards – Chapter 2: Alterations and Additions" <https://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-ada-standards/guide-to-the-ada-standards/chapter-2-alterations-and-additions>

⁵⁶ DOJ. 2010 ADA Standards. 202.3 Alterations

⁵⁷ DOJ. "State and Local Government Facilities: Guidance on the Revisions to 28 CFR 35.151" in Guidance on the 2010 ADA Standards for Accessible Design available at <https://www.ada.gov/regs2010/2010ADASTandards/Guidance2010ADASTandards.htm#titleII>.

⁵⁸ DOJ, Title II Regulations Subpart D § 35.150(b)(2)(i) Safe harbor.

⁵⁹ DOJ, Title II Regulations Subpart D § 35.151(b)(4)(ii)(C) Path of travel--safe harbor

This exception applies to elements that might otherwise have to be modified under:

- The program access requirement for public entities,
- The readily achievable barrier removal requirements for places of public accommodation, and
- The path of travel requirement for any alteration that affects the usability of a primary function area in any covered facility.

If a public entity constructed or altered required elements of a path of travel in accordance with the specifications in either the 1991 ADA Standards or the Uniform Federal Accessibility Standards before March 15, 2012, the public entity is not required to retrofit such elements to reflect incremental changes in the 2010 ADA Standards solely because of an alteration to a primary function area served by that path of travel.⁶⁰ In California, the extent of required path of travel upgrades are subject to an annually adjusted valuation threshold based on the overall project cost of facility alterations regardless of federal safe harbor provisions.⁶¹

The 2010 ADA Standards also identify structural elements that do not fall under the safe harbor provision. The following elements are not eligible for element-by-element safe harbor because technical or scoping specifications for them were not addressed in the 1991 ADA Standards but were added as supplemental requirements prior to 2010.⁶²

- Residential facilities dwelling units, sections 233 and 809.
- Amusement rides, sections 234 and 1002; 206.2.9; 216.12.
- Recreational boating facilities, sections 235 and 1003; 206.2.10.
- Exercise machines and equipment, sections 236 and 1004; 206.2.13.
- Fishing piers and platforms, sections 237 and 1005; 206.2.14.
- Golf facilities, sections 238 and 1006; 206.2.15.
- Miniature golf facilities, sections 239 and 1007; 206.2.16.
- Play areas, sections 240 and 1008; 206.2.17.
- Saunas and steam rooms, sections 241 and 612.
- Swimming pools, wading pools, and spas, sections 242 and 1009
- Shooting facilities with firing positions, sections 243 and 1010.
- Miscellaneous:
 - Team or player seating, section 221.2.1.4,
 - Accessible route to bowling lanes, section. 206.2.11,
 - Accessible route in court sports facilities, section 206.2.12.

⁶⁰ DOJ, Title II Regulations Subpart D § 35.150(b)(2)(ii) Safe Harbor

⁶¹ California Access Compliance Advisory Reference Manual, Chapter 2 Valuation Threshold

⁶² The list is from DOJ, Title II Regulations Subpart D § 35.150(b)(2)(ii)

4.2 Undue Burden

Napa County is not required to take any action that it can demonstrate would result in a fundamental alteration in the nature of its services, programs, or activities; would create a hazardous condition resulting in a direct threat to a program participant or others; or would represent an undue financial and administrative burden.

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

4.3 Construction Tolerances

The ADA and CBC acknowledge the possibility of small variations between the standards and the resulting constructed feature. The CBC states that all dimensions are subject to conventional industry tolerances except where the requirement is stated as a range with specific minimum and maximum end points.⁶³

Application of conventional industry tolerances must be on a case-by-case, project-by-project basis. Predetermined guidelines for construction tolerances could unnecessarily encourage contractors and others to deviate from the access regulations found in the CBC and may wrongfully be viewed by some to have the effect of law. Conventional industry tolerances include those for field conditions and those that may be a necessary consequence of a particular manufacturing process. Recognized tolerances do not apply to design work and should be anticipated in the design phase.

The barrier reports available through the County do not reflect the application of construction tolerances. The County will evaluate the application of construction tolerances on a case-by-case basis when alterations or barrier remediation actions are undertaken.

⁶³ California Department of General Services. *Use of Predetermined Construction Tolerance Guidelines for Accessibility*, IR 11B-8. 2011
https://www.documents.dgs.ca.gov/dsa/pubs/ir_11b-8_rev01-01-11.pdf.

4.4 Historic Buildings and Facilities

Alterations to a qualified historic building or facility must comply with the 2010 ADA Standards and the 2019 CBC.⁶⁴ A qualified historic property is one that is listed in or eligible for listing in the National Register of Historic Places or is designated as historic under state or local law.

Barrier removals at County historic properties should be done in full compliance with the alteration standards for other types of buildings to the maximum extent feasible. However, if following the usual standards would threaten or destroy the historic significance of a building or site feature, the following alternative standards (which provide a minimal level of access) may be used.

- Require accessible routes only one site access point (such as the parking lot).
- Allow ramps steeper than ordinarily permitted.
- Permit an accessible entrance that is not the one used by the general public.
- Require only one accessible toilet, and allow it to be gender neutral.
- Require accessible routes only on the level of the accessible entrance.
- Locate displays and written information where they can be seen by a seated person.

⁶⁴ DOJ, Title II Regulations Subpart D § 35.151(b) Alterations: ADAAG at 36 CFR part 1191; Section 4.1.7 Accessible Buildings: Historic Preservation; and CCR, Title 24, Part 8, 2019 California Historical Building Code.

5 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.⁶⁵ Although not a legislatively mandated job title, the responsible employee is most commonly referred to as an ADA Coordinator, a term used in this Plan.

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 that 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 Executive Office 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.

⁶⁵ DOJ, Title II Regulations Subpart A § 35.107 Designation of responsible employee and adoption of grievance procedures. For examples and other information from the DOJ regarding the notice and grievance procedure requirements, also see <https://www.ada.gov/pcatoolkit/chap2toolkit.htm>

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"), Napa County will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

Employment: Napa 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 ADA.

Effective Communication: Napa County will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in Napa County's 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: Napa County will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services, and activities. For example, individuals with service animals are welcomed in Napa County facilities, 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 program, service, or activity of Napa County should contact the office of the ADA Coordinator at adacoordinator@countyofnapa.org as soon as possible but no later than 72 hours before the scheduled event.

The ADA does not require Napa 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 program, service, or activity of Napa County is not accessible to persons with disabilities should be directed to the ADA Coordinator at adacoordinator@countyofnapa.org.

Napa 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 but are not accessible to persons who use wheelchairs.

5.3 ADA Grievance Procedure

Title II regulations also require the County to develop and publish grievance procedures to provide fair and prompt resolution of accessibility-related complaints. The County's grievance procedure is based on the U.S. Department of Justice model grievance procedure.

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 ("ADA"). 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 Napa County. The County's Personnel Policy governs employment-related complaints of disability discrimination.

The complaint should be in writing and contain information about the alleged discrimination such as 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 persons with disabilities upon request.

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

ADA Coordinator
1195 Third Street, Napa, CA 94559
phone: 707-259-8744
telecommunication relay service: 711
email: adacoordinator@countyofnapa.org

Within 15 calendar days after receipt of the complaint, the ADA Coordinator or their 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 tape. The response will explain the position of Napa County and offer options for substantive resolution of the complaint.

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

Within 15 calendar days after receipt of the appeal, the County Executive Officer or their designee will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, the County Executive Officer or their 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 their designee, appeals to County Executive Officer or their designee, and responses from these two offices will be retained by Napa County for at least three years.

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6 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.⁶⁶

Accessible. A site, building, facility, or portion thereof is deemed accessible when it is approachable and usable by persons with disabilities in compliance with technical standards adopted by the relevant Administrative Authority.

Administrative Authority. A governmental agency that adopts or enforces regulations and guidelines for the design, construction, or alteration of buildings and facilities.

ADA Coordinator. The individual responsible for coordinating the efforts of the government entity to comply with title II and investigating any complaints that the entity has violated title II. Also known as Disability Access Manager or Accessibility Manager.

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, or changes or rearrangement of structural parts or elements of a facility.

Alternative Text. The term *alternative text* refers to the 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 people with visual or certain cognitive disabilities.

Auxiliary Aids and Services. Refers to ways to communicate with people who have communication disabilities such as blindness, vision loss, deafness, hearing loss, a combination of vision and hearing loss or speech or language disorders. The key to deciding what aid or service is needed to communicate effectively with people with disabilities and their companions is to consider the nature, length, complexity, and context of the communication as well as the person's normal method(s) of communication. Auxiliary aids and services include the use of interpreters, notetakers, 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. A raised pedestrian street crossings, depressed corners, or similar connections between the pedestrian access route at the level of the sidewalk and the level of the pedestrian street crossing that have a grade of five percent or less.

Clear Ground Space. The minimum unobstructed ground space required to accommodate 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 a claimed violation of the ADA.

⁶⁶ DOJ, Title II Regulations Subpart A § 35.104 Definitions.

Cross Slope. The grade that is perpendicular to the direction of pedestrian travel. On a sidewalk, the cross slope is measured perpendicular to the curb line or edge of the street or highway.

Curb Line. A line at the face of the curb that marks the transition between the curb and the gutter, street, or highway.

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

Disability. The term disability means, with respect to an individual:

1. A physical or mental impairment that substantially limits one or more of the major life activities of such individual;
2. A record of such impairment; or
3. Being regarded as having a disability or such impairment.

Discrimination on the Basis of Disability. Discrimination on the basis of disability means 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; and
- 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 communication with people without disabilities.

Element. An architectural or mechanical component of a building, facility, space, site, or public right-of-way.

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

Fundamental Alteration. A modification that is so significant that it alters the essential nature of the goods, services, facilities, privileges, advantages, or accommodations offered. If a public entity can demonstrate that the modification would fundamentally alter the nature of its service, program, or activity, it is not required to make the modification. If a public accommodation (private entity) can demonstrate that a modification would fundamentally alter the nature of the goods, services, facilities, privileges, advantages, or accommodations it provides, it is not required to make the modification.

Grade. The degree of inclination of a surface. See Slope. In public right-of-way, the grade is the slope parallel to the direction of pedestrian travel.

Grade Break. The line where two surface planes with different grades meet.

Having a Record of Impairment. An individual is disabled if he or she has a history of having an impairment that substantially limits the performance of a major life activity; or has been diagnosed, correctly or incorrectly, as having such impairment.

International Symbol of Accessibility (ISA). The ISA is recognized worldwide as a symbol identifying accessible elements and spaces. Standards issued under the ADA and ABA Standards reference and reproduce the ISA to ensure consistency in the designation of accessible elements and spaces. Uniform iconography promotes legibility, especially for people with low vision or cognitive disabilities. Guidance on the use of the ISA under the ADA is available at <https://www.access-board.gov/attachments/article/1898/ISA-guidance.pdf>.



Maintenance. Routine or periodic repair of all pedestrian facilities to restore them to the standards to which they were originally designed and built. Maintenance does not change the original purpose, intent, or design of public sidewalks, shared-use paths, curb ramps, crosswalks, pedestrian islands, or other public walkways.

Operable Part. A component of an element used to insert or withdraw objects, or to activate, deactivate, or adjust the element. The technical requirements for operable parts apply to operable parts on accessible pedestrian signals and pedestrian pushbuttons and parking meters and parking pay stations that serve accessible parking spaces.

Other Power-Driven Mobility Device (OPDMD). Any mobility device powered by batteries, fuel, or other engines that is used by individuals with mobility disabilities for locomotion and designed to operate in areas without defined pedestrian routes.

Path of Travel. A path of travel is a continuous, unobstructed way of pedestrian passage by means of which a newly constructed or altered area may be approached, entered and exited and which connects an area with an exterior approach (including sidewalks, streets and parking areas), an entrance to the facility and other parts of a facility. An accessible path of travel may consist of walks and sidewalks, curb ramps and other interior or exterior pedestrian ramps; clear floor paths 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 of travel 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 within or coinciding with a pedestrian circulation path in the public right-of-way.

Pedestrian Circulation Path. A prepared exterior or interior surface provided for pedestrian travel in the public right-of-way

Physical or Mental Impairments. Physical or mental impairments may include, but are not limited to, 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.

The following conditions are not 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 or being accomplished within the context of the facility and within the limits of the applicable *ABA Conditions for Exception, 1019*. Feasible.

Primary Function. A major activity for which a facility is intended. Areas that contain a primary function include, but are not limited to, the dining area of a cafeteria, the meeting rooms in a conference center, as well as offices and other work areas in which the activities of the public entity using a facility are carried out.

Program Accessibility. A public entity's services, programs, or activities, when viewed in their entirety, must be readily accessible to and usable by individuals with disabilities.

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

Public Right-of-Way. Public land or property, usually in interconnected corridors, that is acquired for or dedicated to transportation purposes.

Qualified Historic Facility. A facility that is listed in or eligible for listing in the National Register of Historic Places or designated as historic under an appropriate state or local law.

Qualified Individual with a Disability. A qualified individual with a disability means an individual with a disability who, with or without reasonable modification to rules, policies, or practices; the removal of architectural, communication, or transportation barriers; or the provision of auxiliary aids and services, meets the essential eligibility requirements for the receipt of services or the participation in programs or activities provided by the County.

Reasonable Modification. A public entity must modify its policies, practice, or procedures to avoid discrimination unless the modification would fundamentally alter the nature of its service, program, or activity.

Regarded as Having a Disability. An individual is disabled if she or he is treated or perceived as having an impairment that substantially limits major life activities, although no such impairment exists.

Running Slope. The grade that is parallel to the direction of pedestrian travel.

Scoping. Requirements that specify what features are required to be accessible and, where multiple features of the same type are provided, how many of the features are required to be accessible.

Service Animal. Service animals are dogs (and in certain circumstances, miniature horses) that are individually trained to perform tasks for people with disabilities. Examples of such work or tasks include guiding people who are blind, alerting people who are deaf, pulling a wheelchair, alerting and protecting a person who is having a seizure, reminding a person with mental illness to take 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.

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 safe operation of the facility.

Slope. A ground surface that forms a natural or artificial incline. Slope is typically written as either a percentage or a ratio that represents the change in elevation between two points of an incline divided by the horizontal distance between the two points.

- Cross Slope. The slope perpendicular to the direction of travel.
- Running Slope. The slope parallel to the direction of travel

Substantial Limitations of Major Life Activities. An individual is disabled if she or he has a physical or mental impairment that (a) renders her or him unable to perform a major life activity, or (b) substantially limits the condition, manner, or duration under which she or he can perform a particular major life activity in comparison to other people.

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

In determining whether a physical or mental impairment substantially limits the condition, manner, or duration under which an individual can perform a particular major life activity in comparison to other people, the following factors shall be considered:

- The nature and severity of the impairment;
- The duration or expected duration of the impairment; and
- The permanent or long-term impact (or expected impact) of or resulting from the impairment.

Technical Standards. Specify the design criteria for accessible features, including the specific numbers, conditions, and measurements that are required.

Technically Infeasible. With respect to an alteration of a building or a facility, something that has little likelihood of being accomplished because existing structural conditions would require removing or altering a load-bearing member that is an essential part of the structural frame; or because other existing physical or site constraints prohibit modification or addition of elements, spaces or features that are in full and strict compliance with the minimum requirements.

Telecommunications Display Device (TDD). A telecommunications display device for the deaf (TDD) is an electronic device for text communication via a telephone line, used when one or more of the parties has hearing or speech difficulties. Other names for TDD include TTY.

Telecommunications Relay Service (TRS) or 711. Reached by calling 711, the free, nationwide telecommunications relay service uses communications assistants who serve as intermediaries between people who have hearing or speech disabilities that use 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). Teletypewriters or text telephones have a keyboard and a visual display for exchanging written messages over the telephone. The ADA established a free, nationwide relay network to handle voice-to-TTY and TTY-to-voice calls, which is reached by calling 711. TTY is a more general term for teletypes but is often referred to as TDD.

Vertical Surface Discontinuities. Vertical differences in level between two adjacent surfaces.

Video Relay Service (VRS). Video relay service (VRS) is a free, subscriber-based service for people who use sign language and have videophones, smartphones, or computers with video communication capabilities. For outgoing calls, the subscriber contacts the VRS interpreter, who places the call and serves as an intermediary between the subscriber and a person who uses a standard voice telephone. The interpreter tells the telephone user what the subscriber is signing and signs to the subscriber what the telephone user is saying.

Wheeled Mobility Device. A manually operated or power-driven device designed primarily for use by an individual with a mobility disability for the main purpose of indoor or of both indoor and outdoor locomotion. Also referred to as a manual wheelchair, a power wheelchair, or an electric scooter.

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7 Resources

7.1 California and National Organizations Supporting People with Disabilities

General

TDI Online

<http://www.tdi-online.org/>

TDI's mission is to promote equal access in telecommunications and media for people who have hearing loss, are deaf, late deafened, or deaf blind. TDI encourages accessible applications of existing and emerging technologies in all sectors of the community, advises on promotes the uniformity of standards for telecommunications and media technologies and networks and collaborates with other disability organizations, government, industry, and academia.

Access Northern California

www.accessnca.org

An online interactive Wheelchair Rider's Guide to the California Coast provides easy access to outdoor adventures for wheeled mobility device riders, parents pushing strollers, and others who need accessibility features such as a wide, fairly level, and firm accessible pedestrian route. The website helps users choose the destinations that suit their needs from among the coast's many parks, trails, beaches, viewpoints, and other sites of interest that are accessible to wheeled mobility devices. It also provides links to resources for accessible travel guides, guided hikes and outings, and organizations serving park and trail users with disabilities.

7.2 Guidance Documents and Organizations

General

AbleData (assistive technology)

<http://www.abledata.com/abledata.cfm>

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

ADA National Network. 2015. <https://adata.org/publication/temporary-events-guide>

Planning Accessible Meetings and Events

American Bar Association Commission on Disability Rights. 2015.

https://www.americanbar.org/content/dam/aba/administrative/mental_physical_disability/Accessible_Meetings_Toolkit.authcheckdam.pdf

California Trail Resources

American Trails. <http://americantrails.org/resources/statetrails/CAstate.html>

ASSISTIVETECH.NET – The National Public Website on Assistive Technology

<http://www.assistivetech.net/>

Disabled Sports USA

Challenge Magazine. <http://www.disabledsportsusa.org/about/news/challenge-magazine/>

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>

TTY and TTY Relay Services

National Association of the Deaf (NAD).

<https://www.nad.org/resources/technology/telephone-and-relay-services/tty-and-tty-relay-services/>

National Center on Accessibility

Indiana University, Bloomington. <http://www.ncaonline.org/resources/>

What to Know Before You Go: The Big Questions to Ask Before Arriving at Your Accessible Recreation Destination

National Center on Physical Activity and Disability.

<https://www.nchpad.org/277/1750/What~to~Know~Before~You~Go~~The~Big~Questions~to~Ask~Before~Arriving~at~Your~~Accessible~~Recreation~Destination>

North Carolina State University: The Center for Universal Design

<https://projects.ncsu.edu/ncsu/design/cud/>

Pacific ADA Center

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

Accessible Public Event Checklist

San Francisco, City and County. 2018. <http://sfgov.org/mod/accessible-public-event-checklist>

Program Access: Beyond Bricks and Mortar

National Center on Accessibility, Skulski, Jennifer and Gary Robb. Indiana University,

Bloomington. 2006. <http://www.ncaonline.org/resources/articles/program-access.shtml>

7.3 Guidance Documents and Articles—Web Design

General Resources

National Center for Accessible Media (NCAM)

NCAM is a research and development facility dedicated to addressing barriers to media and emerging technologies for people with disabilities in their homes, schools, workplaces, and communities. NCAM is part of the Media Access Group at Boston public broadcaster WGBH, which includes two production units, The Caption Center and Descriptive Video Service® (DVS®). Tools and guidelines for creating accessible media can be downloaded from the NCAM website at http://ncam.wgbh.org/invent_build/web_multimedia/tools-guidelines.

State of California

The California Department of Education (CDE) adopted its first set of accessibility standards in 2001, which were based almost entirely on the Version 1.0 Checkpoints from the W3C WCAG. In 2003, the State of California enacted Government Code (GC) Section 11135, requiring all its agencies and departments to comply with federal Section 508. In 2006 the State adopted accessibility standards for web design that apply to all State of California public Internet web sites for state organizations that report to the Governor and State Chief Information Office (CIO) and which were offered as a resource to other constitutional offices as they work to make their public websites accessible. Effective November 1, 2007, all California departments and agencies reporting to the Governor were requested to comply with ca.gov design, accessibility, and usability standards and best practices as included in a policy notice issued in 2007.

- California Department of Education Web Accessibility Standards.
<https://www.cde.ca.gov/re/di/ws/webaccessstds.asp>
- Recommendation on Accessibility Standards for California State Web Pages. 2006.
https://webtools.ca.gov/wp-content/uploads/sites/7/2012/07/IOUCA_Accessibility_Recommendation_Adopted_071406.pdf
- Policy Notice: Web Site Development Guidelines. January 23, 2007.
<https://webtools.ca.gov/wp-content/uploads/sites/7/2012/07/WebPolicy.pdf>

Utah State University, Center for Persons with Disabilities, WebAIM

WebAIM (Web Accessibility In Mind) has provided comprehensive web accessibility solutions since 1999. WebAIM is a non-profit organization based at the Center for Persons with Disabilities at Utah State University. Documents and training materials, including the following publications, can also be downloaded from WebAIM website (<http://www.webaim.org/>).

- Color Contrast Checker. <https://webaim.org/resources/contrastchecker/>
- Web Accessibility Evaluation Tool (WAVE). <http://wave.webaim.org/>
- Section 508 Checklist. <https://webaim.org/standards/wcag/WCAG2Checklist.pdf>
- Web Accessibility for Designers. <https://webaim.org/resources/designers/>

Web Accessibility Initiative (WAI)

WAI develops guidelines widely regarded as the international standard for Web accessibility, support materials to help understand and implement Web accessibility, and resources, through international collaboration. The Web Content Accessibility Guidelines (WCAG) was developed with a goal of providing a single shared standard for web content accessibility that meets the needs of individuals, organizations, and governments internationally. Documents and training materials, including the following publications, can also be downloaded from the WAI website (<https://www.w3.org/WAI/>).

Web Content Accessibility Guidelines (WCAG) 2.1

Kirkpatrick, Andrew, Joshue O Conner, Alastair Campbell, and Michael Cooper (eds.) 2018.

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

7.4 Guidance Documents and Articles—Signage

General

APH Tactile Graphic Image Library

American Printing House for the Blind, Inc. (APH). <http://www.aph.org/tgil/>

Effective Color Contrast: Designing for People with Partial Sight and Color Deficiencies

Arditi, Aries. 2005 <http://li129-107.members.linode.com/accessibility/design/accessible-print-design/effective-color-contrast/>

California State Parks Accessibility Guidelines

California Department of Parks and Recreation. 2015.

http://www.parks.ca.gov/pages/1008/files/2015_california_state_parks_accessibility_guidelines.pdf

Signage and the 2010 ADA Standards v2.1

Luminant Design LLC. 2011. <http://www.luminantdesign.com/ada.html>

Shoreline Signs: Public Access Signage Guidelines

San Francisco Bay Conservation and Development Commission (BCDC). 2005.

<http://www.bcdc.ca.gov/pdf/planning/SSSG.pdf>

Requirements in the 2010 Standards for Accessible Design

Society for Experiential Graphic Design (SEGD). Signage 2012.

https://segd.org/sites/default/files/SEGD_2012_ADA_White_Paper_Update.pdf

Harpers Ferry Center Accessibility Committee

U.S. Department of the Interior, National Park Service

Harpers Ferry Center serves as the Interpretive Design Center for the National Park Service. It works to ensure that the highest level of accessibility that is reasonable is incorporated into all aspects of interpretive media, planning, design, and construction. This includes ensuring that all new interpretive media are accessible to and usable by all people with disabilities. It also means all existing practices and procedures are evaluated to determine the degree to which they are currently accessible to all visitors, and modifications are made to assure conformance with applicable laws and regulations. The Center's website includes resources, guidelines, updates, photographs of best practices, and more.

- Wayside Exhibits: A Guide to Developing Outdoor Interpretive Exhibits. 2009. <https://www.nps.gov/hfc/pdf/waysides/wayside-guide-first-edition.pdf>
- Programmatic Accessibility Guidelines for National Park Service Interpretive Media, v2.3. 2017. <https://www.nps.gov/hfc/accessibility/guidelines/>

7.5 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. <http://acb.org/large-print-guidelines>

Guidelines and Standards for Tactile Graphics (Web Version).

Braille Authority of North America and the Canadian Braille Authority. 2012.

<http://www.brailleauthority.org/tg/web-manual/tgmanual.html>

GSA Government-wide Section 508 Accessibility Program

Guidance on creating and testing accessible documents includes:

- Create Accessible Electronic Documents <https://www.section508.gov/content/build/create-accessible-documents>
- Section 508 Basic Authoring and Testing Guides, MS Word 2010 and MS 2013. 2015. <https://www.section508.gov/content/build/create-accessible-documents>
- Basic Authoring and Testing Checklists, MS Word 2010 and MS 2013. 2015. <https://www.section508.gov/content/build/create-accessible-documents>
- Baseline Tests for Accessible Electronic Documents—MS Word 2010 and MS 2013. 2015. <https://www.section508.gov/content/build/create-accessible-documents>

Braille Transcription Resource List

National Federation of the Blind. <https://nfb.org/braille-transcription-resource-list>

Smithsonian Guidelines for Accessible Publication Design

Smithsonian Institution. 2001. <https://www.si.edu/Content/Accessibility/Publication-Guidelines.pdf>

SSA Guide: Producing Accessible Word and PDF Documents, Version 2.1

Social Security Administration, Accessibility Resource Center (SSA-ARC). 2010.

https://www.ssa.gov/accessibility/files/The_Social_Security_Administration_Accessible_Document_Authoring_Guide_2.1.2.pdf

A Guide to Making Documents Accessible to People Who Are Blind or Visually Impaired

Sutton, Jennifer. 2002. <http://www.sabeusa.org/wp-content/uploads/2014/02/A-Guide-to-Making-Documents-Accessible-to-People-Who-are-Blind-or-Visually-Impaired.pdf>

Creating Accessible PDFs with Adobe Acrobat Professional

U. S. Department of Veterans Affairs, Section 508 Support Office. 2016.

<https://www.section508.va.gov/support/tutorials/pdf/index.asp>

7.6 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>

Overview of Title II Requirements for Buildings and Facilities

Mayor's Office on Disability. City and County of San Francisco.

<https://www.ada.gov/pubs/t2qa.txt>

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

General

Emergency Management Institute (EMI)

<http://training.fema.gov/EMI/>

Fact Sheet: Access and Functional Needs Support

FEMA, US Department of Homeland Security, FEMA. 2018. https://www.fema.gov/media-library-data/1529082373683-6d3fdc61cee23005b6624ebbace52324/Access_Function.pdf

Interagency Coordinating Council on Emergency Preparedness and Individuals with Disabilities (ICC)

<http://www.disabilitypreparedness.gov/>

National Council on Disability (NCD)

<http://www.ncd.gov/>

National Institute on Disability and Rehabilitation Research (NIDRR)

<http://www2.ed.gov/about/offices/list/osers/nidrr/index.html>

Long Range Transportation Plan: Traveler Information

National Park Service, US Department of the Interior. 2017.

https://www.nps.gov/orgs/1548/upload/National_Long_Range_Transportation_Plan_508-Compliant-for-WEB_July_2017.pdf

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>

Office of Access and Functional Needs Library

State of California, Governor's Office of Emergency Services (Cal OES). Includes links to current access and functional needs-related planning resources for providing emergency services for people with disabilities.

<http://www.caloes.ca.gov/cal-oes-divisions/access-functional-needs/afn-library>

7.8 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

2010 ADA Standards for Accessible Design.

2010. 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

ADA Best Practices Tool Kit for State and Local Governments

2008. <https://www.ada.gov/pcatoolkit/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

Frequently Asked Questions about Service Animals and the ADA

2015. 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. Single copies of publications are available free and can be downloaded or ordered by completing a form available on the Access Board's website (<http://www.access-board.gov/>). In addition to regular print, publications are available in large-print format, disk, audiocassette, and braille.

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>

Endangered Species Act (16 U.S.C. 1531 et seq.)

U.S. Fish and Wildlife Service. <https://www.fws.gov/endangered/laws-policies/>

National Environmental Policy Act (42 U.S.C. 4321 et seq.)

U.S. Environmental Protection Agency. <https://www.epa.gov/nepa>

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>

Wilderness Act (16 U.S.C. 1131 et seq.)

U.S. Department of the Interior, National Park Service.
<https://wilderness.nps.gov/document/wildernessAct.pdf>

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 State Parks Accessibility Guidelines

Department of Parks and Recreation. 2015.

http://www.parks.ca.gov/pages/1008/files/2015_california_state_parks_accessibility_guidelines.pdf

The Accessibility Guidelines are intended as a reference manual and department policy on accessible design that provide guidance for common uses in the State Park System. They are utilized in planning and implementing regular maintenance activities, construction projects, and in the development of presentations, publications, exhibits, new programs and special events. The Accessibility Guidelines are authorized for use throughout California State Parks, including the Off-Highway Motor Vehicle Recreation Division, the Division of Boating and Waterways, concessionaires, cooperating associations and locally operated parks.

California Access Compliance Advisory Reference Manual.

Division of State Architect (DSA). 2016.

https://www.documents.dgs.ca.gov/dsa/pubs/2016CBC_Advisory_Manual.pdf

The purpose of this book of regulations and statutes together is to clarify the obligations for architectural accessibility in California.

2016 Valuation Threshold for Alterations, Structural Repairs or Additions to Existing Buildings

<http://www.dgs.ca.gov/dsa/Programs/progAccess/threshold.aspx>

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 2019 valuation threshold is \$ 166,157 and will be updated again in January 2019.

Sensitive Resource Protection

California Department of Fish and Wildlife. California Environmental Quality Act (CEQA). (California Public Resources Code, Sections 21000 - 21178, and Title 14 CCR, Section 753, and Chapter 3, Sections 15000 - 15387). <https://www.wildlife.ca.gov/Conservation/CEQA/Purpose>

California State Law and Historic Preservation: Statutes, Regulations and Administrative Policies Regarding the Preservation and Protection of Cultural and Historical Resources

California Department of Parks and Recreation Office of Historic Preservation. Technical Assistance Services #10. 2005. <http://ohp.parks.ca.gov/pages/1069/files/10%20comb.pdf>

Appendix A: Public Outreach



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ADA Focus Group #1 Summary

Introduction

On May 23, 2018, the County of Napa invited a selected group of individuals and organizations to participate in a single-day, two-hour meeting to discuss opportunities for and challenges to increasing access for all Napa County residents—with and without disabilities. The meeting included five participants and three staff members.

Focus Group #1 Participants

- Colleen Harmon, Community Member and Caregiver
- Joann Busenbark, Community Member and Advocate
- Kevin Reid, Crush MS Founder and Advocate
- Kimberly Olson, NVUSD, Education Specialist
- Randy Kitch, North Bay Regional Center

Discussion Summary

The County sought participants' opinions and experiences related to the accessibility of County programs and facilities. This document summarizes the perceptions, comments, and recommendations of the participants.

Right-of-Way

- Provide more curb cuts, in general, to improve connectivity in the PROW.
- Make improvements to the curb cuts at the intersection of Salvador Avenue and CA-29.

County Facilities

- Although plans for the 2018 Napa County South Campus Frontage Landscape Improvements Project include improved pedestrian paths of travel, ensure that accessible parking spaces are located closest to the entrances of meeting spaces.
- Keep accessible service counters clear. When items are stored on them, they can become unusable for some people with disabilities.
- Provide more automatic door openers and adjust the closing times of existing automatic door closers.
- Review architectural plans for all buildings in the County for accessibility. Recent renovations to Beringer Vineyards appear to meet the letter of the law, but there is no information about accessibility on their website. Providing directional signage for accessible paths of travel is essential.

Civic Engagement

- Provide accessible locations for Commission on Aging meetings, such as the Board of Supervisors Chamber at 1195 Third Street.

Special Events

- Ensure that an adequate number of accessible portable restrooms are provided at special events.
- Provide accessible toilets with seats that are 17 to 19 inches high at special events.
- Locate the centenarian event at an accessible facility.
- Provide accessible temporary tents with adequate maneuvering spaces in corridors and aisles.
- Review each special event site completely to determine if people with disabilities will be able to move around the site, get to facilities, and participate in activities. Walk the site and identify the accessible (or most accessible) routes. People with disabilities should be able to use the same route as everyone else whenever possible and should not have to travel unusually long distances to reach a destination. Uneven terrain is often a problem at special events, especially for people with mobility disabilities.

Equipment

- Provide seating options that accommodate the needs of all users. For example, rolling chairs can be dangerous for people with mobility disabilities.

Maintenance

- Solicit feedback from people with disabilities on maintaining the accessibility of elements within County facilities.

Transportation

- Work with tour providers to encourage improved accessibility on board and during tours so that non-profit groups like CRUSH MS could host events.
- When transportation is provided to volunteers, program participants, visitors, and others who participate in County programs, establish procedures to make transportation accessible to persons who have visual, hearing, mobility, cognitive, or other disabilities.

Staff Training

- Ensure that staff training addresses strategies for providing accessible facilities, programs, services, and activities. A participant recommended establishing partnerships with non-profit and other agencies providing services to people with disabilities (such as ParentsCAN) to provide training.
- Provide training on inclusion and how to interact with people with disabilities,

including people with developmental disabilities. Participants specifically recommended that staff receive training that reduces fears about disabilities, on the importance of establishing eye-to-eye contact when providing directions or information, and on what types of questions are appropriate to ask people with disabilities when providing services.

Accessibility Requests

- Provide information about agendas well in advance of meetings so that people with disabilities have sufficient time to make necessary arrangements.

ADA Coordinator and Complaint Procedures

- Designate a full-time ADA Coordinator to provide better communication about accessibility within the County.
- One participant requested information about how the County handles ADA complaints.

Transition Plan Schedule

- Give accessibility improvements at CSOA at 650 Imperial Way a high priority because of the population served at this location.

ADA Focus Group #2 Summary

Introduction

On June 3, 2019, the County of Napa welcomed ADA Focus Group #2 participants to review the Transition Plan document and provide recommendations for final changes. Members of the public were invited to comment on the plan and give input as to what items should be prioritized, or if additional concerns need to be addressed. The meeting included one participant and four staff members.

Focus Group #2 Participant

- Kevin Reid, Crush MS Founder and Advocate

Discussion Summary

This document summarizes the main discussion points emphasized by the participants at the meeting:

- Napa County is proactively moving forward to address the needed modifications through prioritization and reviewing several models to address the “maintenance” level barriers, which could include a temporary increase in staffing levels
- The majority of modifications required under the transition plan are defined as maintenance-related and are cost-efficient to remedy, and representatives from Napa County indicated they would like to move quickly to address these items
- Dave Peters who is the current Safety Officer for the Napa County Office of Emergency Services is serving as the Napa County ADA Coordinator
- Community member and disability advocate Kevin Reed stated he is satisfied with the Transition Plan and the stated remediation process.
- Transportation and housing needs for residents with disabilities were also discussed, though most of the areas of need and concern do not fall under the jurisdiction of the County.

Other Public Comment

On July 18, 2019, the County's ADA Coordinator and Deputy Director of Public Works met with Gina Biter-Mundt, an interested community member, to discuss a number of topics related to the Transition Plan and the County's commitment to providing accessible services. While Ms. Biter-Mundt did not have specific comments on the Plan itself, she relayed concerns around public outreach, emergency shelters, compliance requirements, implementation timeline, and future staff training. Staff committed to regular communications and updates with Ms. Biter-Mundt on the County's accessibility practices.

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Appendix B: ADA Barrier Analysis Summary Report



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Maps

Facilities Evaluated

Right-of-Way Barrier Removal Projects: Map Sections

Right-of-Way Barrier Removal Projects: Map Section 1

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Right-of-Way Barrier Removal Projects: Map Section 5

Right-of-Way Barrier Removal Projects: Map Section 6

1.0 ADA Barriers in the Built Environment

The process of developing an American with Disabilities Act (ADA) Transition Plan includes the identification of access barriers within the built environment. Napa County evaluated its buildings and public right-of-way facilities in the summer and fall of 2017.

1.1 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) Standards for Outdoor Developed Areas, 2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG), and the 2014 California Manual on Uniform Traffic Control Devices for Streets and Highways (CAMUTCD) were used to identify barriers at County facilities. Building codes and standards are revised every few years. The barrier evaluations conducted provide an assessment of current conditions as viewed by current code and provide a baseline for future barrier removal.

1.2 Facility Assessments

Facility Assessments – Buildings & Sites

During the site evaluations of Napa 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 physical barriers in each facility that limit accessibility and compared each facility to the 2010 ADA, 2016 CBC, and the 2015 ABA.

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

The elements included in the building evaluations are as follows:

- Area of Refuge
- Assembly Area
- ATM
- Bathing Facility
- Boating Facilities
- Building Level / Lift
- Built-in Elements
- Bus Stops and Light Rail Platforms
- Corridor/Aisle
- Curb Ramp
- Door/Gate
- Drinking Fountain
- Eating Area/Vending Machines
- Elevator
- Exercise Machines and Equipment
- Fishing Piers and Platforms
- Game and Sports Area
- Golf Course
- Hazard
- Judicial Facility
- Kitchen
- Library
- Locker Room
- Multiple User Restroom
- Other
- Outdoor Constructed Features
- Parking Area
- Passenger Loading Zone
- Picnic Facilities
- Play Area
- Play Equipment Area
- Ramp
- Room
- Sign
- Single User Restroom
- Stairway
- Swimming Pool/Wading Pools/Spas
- Telephone
- Walk

A summary of the barriers identified at buildings is included in section two of this report.

Facility Assessments - Public Right-of-Way

The evaluations of the public right-of-way facilities included curb ramps, sidewalks, and pedestrian signals. The facilities were evaluated using the 1991 ADAAG, 2010 ADA, 2011 PROWAG, and 2009 MUTCD accessibility standards.

The site evaluations were completed using a consultant team equipped with measuring devices and data tablets to collect GPS barrier information for curb ramps, sidewalks, and pedestrian signals. A summary of the barriers identified within the public right-of-way is included in section three of this report.

2.0 Buildings Barrier Summary

The County organizes its departments into five functional areas. Each functional area is served by a management analyst who acts as the County Executive Officer's liaison to the departments. Analysts conduct budget analysis and review, and work with departments on a variety of projects and issues. To mirror the County's existing management framework, the facilities are organized by functional area in this report, with facilities utilized by multiple functional areas listed under the combined areas.

Community Resources/Infrastructure

- Agricultural Commissioner
- American Canyon Library
- Animal Shelter
- Calistoga Library
- Fifth Street Garage
- Flood Control District
- Napa County Airport
- Napa Library
- Yountville Library

General Administration/Finance and Community Resources/Infrastructure

- Administration

General Administration/Finance and Human Services

- ITS

Human Services

- HHSa ADS
- HHSa American Canyon
- HHSa Calistoga
- HHSa Child Welfare Services
- HHSa Mental Health
- HHSa Mental Health Bella
- HHSa People Empowering People
- HHSa Self-Sufficiency Pear Tree
- HHSa Self-Sufficiency Soscol
- Homeless Shelter
- South Campus

Law/Justice

- Carithers Building
- Grand Jury
- Historic Court House
- Juvenile Courthouse
- Juvenile Justice Center
- Probation-ERC

Law/Justice and Public Safety

- Hall of Justice

Public Safety

- Capell Valley Fire Station
- Dry Creek Fire Station
- Greenwood Fire Station
- Napa County Sheriff
- Yountville Fire Station

Other

- Cuttings Wharf

2.1 Community Resources/Infrastructure

Agricultural Commissioner

Located at 1710 Soscol Avenue, Napa.

Barriers identified include the following features: curb ramps, doors/gates, drinking fountains, hazards, parking areas, ramps, restrooms, and stairways.

American Canyon Library

Located at 300 Crawford Way, American Canyon.

Barriers identified include the following features: corridors/aisles, curb ramps, doors/gates, drinking fountains, library elements, other features, parking areas, picnic areas, restrooms, and walks.

Animal Shelter

Located at 942 Hartle Court, Napa.

Barriers identified include the following features: built-in elements, corridors/aisles, doors/gates, drinking fountains, hazards, parking areas, restrooms, rooms, and walks.

Calistoga Library

Located at 1108 Myrtle Street, Calistoga.

Barriers identified include the following features: built-in elements, doors/gates, library elements, outdoor constructed features, parking areas, ramps, restrooms, and stairways.

Fifth Street Garage

Located at 1100 Fifth Street, Napa.

Barriers identified include the following features: elevators, hazards, other features, parking areas, signs, stairways, and walks.

Flood Control District

Located at 804 First Street, Napa.

Barriers identified include the following features: built-in elements, corridors/aisles, doors/gates, hazards, parking areas, ramps, restrooms, and walks.

Napa County Airport

Located at 2030 Airport Road, Napa.

Barriers identified include the following features: built-in elements, corridors/aisles, curb ramps, doors/gates, drinking fountains, eating areas, hazards, other features, parking areas, restrooms, telephones, and walks.

Napa Library

Located at 580 Coombs Street, Napa.

Barriers identified include the following features: corridors/aisles, doors/gates, drinking fountains, hazards, library elements, parking areas, ramps, restrooms, rooms, stairways, and walks.

Yountville Library

Located at 6516 Washington Street, Yountville.

Barriers identified include the following features: built-in elements, corridors/aisles, doors/gates, drinking fountains, hazards, library elements, restrooms, rooms, and signs.

2.2 General Administration/Finance and Community Resources/Infrastructure

Administration

Located at 1195 Third Street, Napa.

Barriers identified include the following features: built-in elements, corridors/aisles, doors/gates, drinking fountains, elevators, hazards, other features, outdoor constructed features, parking areas, picnic areas, ramps, restrooms, rooms, stairways, telephones, and walks.

2.3 General Administration/Finance and Human Services

ITS

Located at 650 Imperial Way, Napa.

Barriers identified include the following features: built-in elements, curb ramps, doors/gates, drinking fountains, elevators, parking areas, picnic areas, restrooms, and stairways.

2.4 Human Services

HHSA ADS

Located at 2100 Napa Vallejo Highway, Napa.

Barriers identified include the following features: bathing facilities, corridors/aisles, curb ramps, doors/gates, drinking fountains, hazards, parking areas, picnic areas, ramps, restrooms, rooms, signs, telephones, and walks.

HHSA American Canyon

Located at 4381 Broadway, American Canyon.

Barriers identified include the following features: curb ramps, doors/gates, hazards, other features, outdoor constructed features, parking areas, picnic areas, restrooms, rooms, and walks.

HHSA Calistoga

Located at 1705 Washington Street, Calistoga.

Barriers identified include the following features: doors/gates, parking areas, restrooms, rooms, and walks.

HHSA Child Welfare Services

Located at 1917 First Street, Napa.

Barriers identified include the following features: corridors/aisles, doors/gates, hazards, picnic areas, ramps, restrooms, rooms, stairways, and walks.

HHSA Mental Health

Located at 2100 Napa Vallejo Highway, Napa.

Barriers identified include the following features: bathing facilities, corridors/aisles, doors/gates, hazards, kitchens, ramps, restrooms, rooms, stairways, and walks.

HHSA Mental Health Bella

Located at 1046 Bella Drive, Napa.

Barriers identified include the following features: bathing facilities, corridors/aisles, doors/gates, kitchens, picnic areas, restrooms, rooms, and walks.

HHSA People Empowering People

Located at 3281 Solano Avenue, Napa.

Barriers identified include the following features: built-in elements, doors/gates, hazards, kitchens, parking areas, picnic areas, restrooms, rooms, signs, stairways, and walks.

HHSA Self-Sufficiency Pear Tree

Located at 1141 Pear Tree Lane, Napa.

Barriers identified include the following features: corridors/aisles, curb ramps, doors/gates, parking areas, restrooms, rooms, signs, and walks.

HHSA Self-Sufficiency Soscol

Located at 1814 Soscol Avenue, Napa.

Barriers identified include the following features: built-in elements, curb ramps, doors/gates, parking areas, and restrooms.

Homeless Shelter

Located at 100 Hartle Court, Napa.

Barriers identified include the following features: bathing facilities, built-in elements, curb ramps, doors/gates, dressing/fitting/locker room/sauna, eating area, hazards, kitchens, parking areas, picnic areas, restrooms, rooms, and walks.

South Campus

Located at 2751 Napa Valley Corporate Drive, Napa.

Barriers identified include the following features: bathing facilities, built-in elements, corridors/aisles, curb ramps, doors/gates, drinking fountains, eating areas, elevators, hazards, kitchens, outdoor constructed features, parking areas, picnic areas, play equipment areas, ramps, restrooms, rooms, signs, stairways, and walks.

2.5 Law/Justice

Carithers Building

Located at 929/931 Parkway Mall and 1127 First Street, Napa.

Barriers identified include the following features: built-in elements, doors/gates, elevators, hazards, other features, parking areas, restrooms, rooms, signs, stairways, and telephones.

Grand Jury

Located at 1754 Second Street, Suite D, Napa.

Barriers identified include the following features: built-in elements, doors/gates, parking areas, restrooms, rooms, signs, and walks.

Historic Court House

Located at 825 Brown Street, Napa.

Barriers identified include the following features: built-in elements, doors/gates, drinking fountains, eating areas, elevators, hazards, judicial facility elements, ramps, restrooms, rooms, stairways, and walks.

Juvenile Courthouse

Located at 212 Walnut Street, Napa.

Barriers identified include the following features: doors/gates, judicial facility elements, restrooms, and rooms.

Juvenile Justice Center

Located at 212 Walnut Street, Napa.

Barriers identified include the following features: bathing facilities, built-in elements, doors/gates, drinking fountains, eating areas, hazards, judicial facility elements, other features, outdoor constructed features, parking areas, picnic areas, restrooms, rooms, signs, stairways, and telephones.

Probation-ERC

Located at 1834 Soscol Avenue, Napa.

Barriers identified include the following features: built-in elements, curb ramps, doors/gates, drinking fountains, kitchens, parking areas, restrooms, and rooms.

2.6 Law/Justice and Public Safety

Hall of Justice

Located at 1125 Third Street, Napa.

Barriers identified include the following features: built-in elements, doors/gates, drinking fountains, hazards, restrooms, rooms, and stairways.

2.7 Public Safety

Capell Valley Fire Station

Located at 1193 Capell Valley Road, Napa.

Barriers identified include the following features: bathing facilities, built-in elements, doors/gates, parking areas, picnic areas, restrooms, and walks.

Dry Creek Fire Station

Located at 5900 Dry Creek Road, Napa.

Barriers identified include the following features: doors/gates, parking areas, restrooms, and walks.

Greenwood Fire Station

Located at 1555 Airport Boulevard, Napa.

Barriers identified include the following features: built-in elements, doors/gates, parking areas, and walks.

Napa County Sheriff

Located at 1535 Airport Boulevard, Napa.

Barriers identified include the following features: built-in elements, doors/gates, elevators, hazards, parking areas, restrooms, rooms, signs, stairways, and walks.

Yountville Fire Station

Located at 7401 Solano Avenue, Yountville.

Barriers identified include the following features: curb ramps, doors/gates, other features, parking areas, restrooms, and walks.

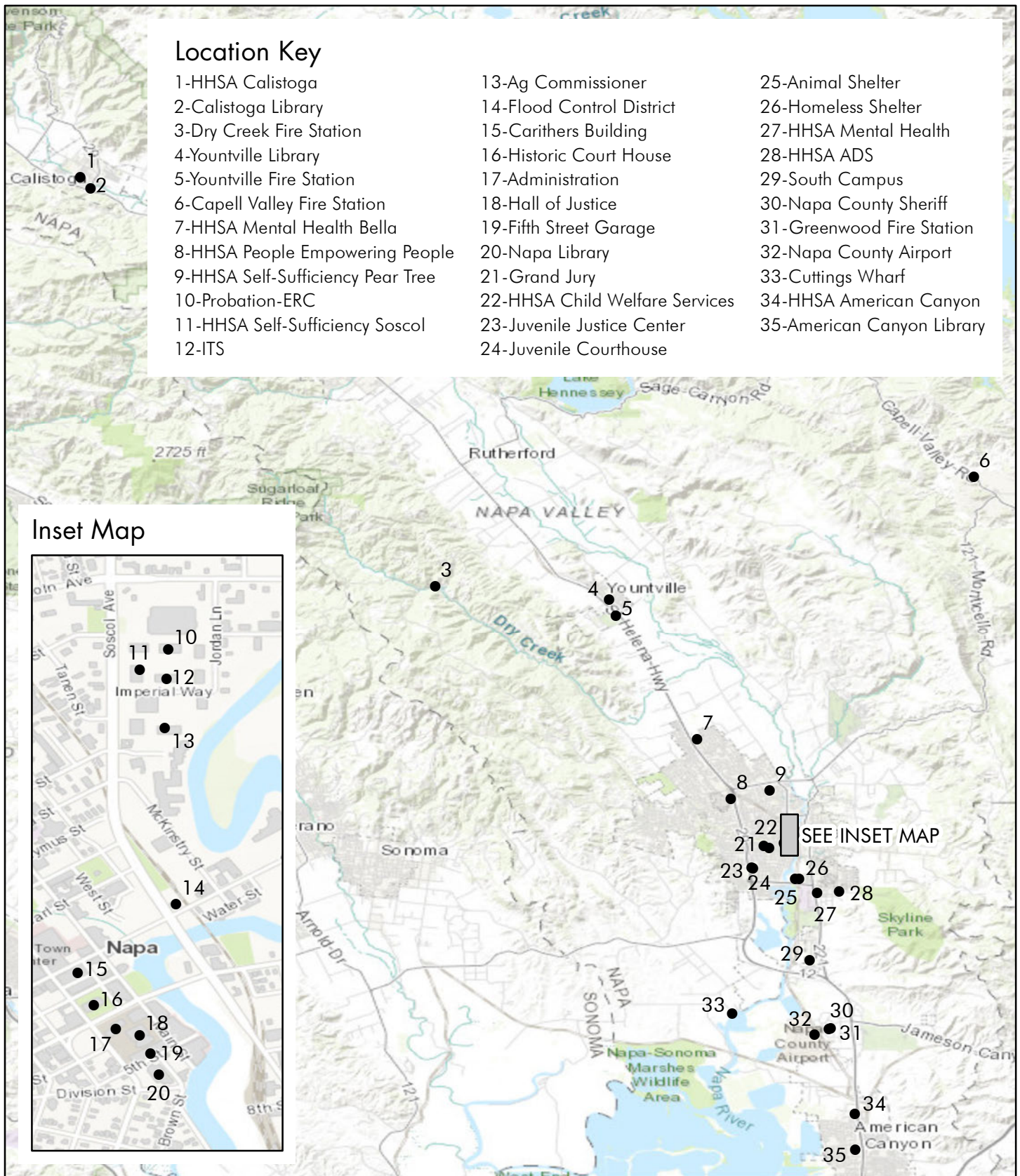
2.8 Other

Cuttings Wharf

Located at 3303 Cuttings Wharf Road, Napa.

Barriers identified include the following features: curb ramps, doors/gates, parking areas, picnic areas, restrooms, and walks.

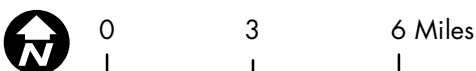
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Napa County ADA Self-Evaluation & Transition Plan

Facilities Evaluated

April 2018



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Table 1. ADA Accessibility Barrier Types at Community Resources/Infrastructure Buildings

	Built-in Elements	Door/Gate	Drinking Fountain	Elevator	Hazard	Other	Outdoor Constructed Features	Paths of Travel*	Parking Area	Picnic Area	Play Equipment Area	Program Specific**	Restrooms	Room	Sign	Telephone
Agricultural Commissioner		●	●		●			●	●				●			
American Canyon Library		●	●			●		●	●	●		●	●			
Animal Shelter	●	●	●		●			●	●				●	●		
Calistoga Library	●	●					●	●	●			●	●	●		
Fifth Street Garage				●	●	●		●	●						●	
Flood Control District		●			●			●	●				●			
Napa County Airport	●	●	●		●	●		●	●			●	●			●
Napa Library		●	●		●			●	●			●	●	●		
Yountville Library	●	●	●		●			●				●	●	●	●	

*Paths of travel encompass corridors/aisles, curb ramps, ramps, stairways, trails, and walks.

**Program specific barriers include features that are typically unique to certain facilities, such as bathing facilities, dressing/fitting/lockers rooms/saunas, eating areas, judicial facilities, kitchens, and libraries.

Table 2. ADA Accessibility Barrier Types at General Administration/Finance and Community Resources/Infrastructure Buildings

	Built-in Elements	Door/Gate	Drinking Fountain	Elevator	Hazard	Other	Outdoor Constructed Features	Paths of Travel*	Parking Area	Picnic Area	Play Equipment Area	Program Specific**	Restrooms	Room	Sign	Telephone
Administration	●	●	●	●	●	●	●	●	●	●			●	●		●

*Paths of travel encompass corridors/aisles, curb ramps, ramps, stairways, trails, and walks.

**Program specific barriers include features that are typically unique to certain facilities, such as bathing facilities, dressing/fitting/lockers rooms/saunas, eating areas, judicial facilities, kitchens, and libraries.

Table 3. ADA Accessibility Barrier Types at General Administration/Finance and Human Services Buildings

	Built-in Elements	Door/Gate	Drinking Fountain	Elevator	Hazard	Other	Outdoor Constructed Features	Paths of Travel*	Parking Area	Picnic Area	Play Equipment Area	Program Specific**	Restrooms	Room	Sign	Telephone
ITS	●	●	●	●				●	●	●			●			

*Paths of travel encompass corridors/aisles, curb ramps, ramps, stairways, trails, and walks.

**Program specific barriers include features that are typically unique to certain facilities, such as bathing facilities, dressing/fitting/lockers rooms/saunas, eating areas, judicial facilities, kitchens, and libraries.

Table 4. ADA Accessibility Barrier Types at Human Services Buildings

	Built-in Elements	Door/Gate	Drinking Fountain	Elevator	Hazard	Other	Outdoor Constructed Features	Paths of Travel*	Parking Area	Picnic Area	Play Equipment Area	Program Specific**	Restrooms	Room	Sign	Telephone
HHSA ADS		●	●		●			●	●	●		●	●		●	●
HHSA American Canyon		●			●	●	●	●	●	●			●	●		
HHSA Calistoga		●						●	●				●	●		
HHSA Child Welfare Services		●			●			●		●			●	●		
HHSA Mental Health		●			●			●				●	●	●		
HHSA Mental Health Bella		●						●		●		●	●	●		
HHSA People Empowering People	●	●			●			●	●	●		●	●	●	●	
HHSA Self-Sufficiency Pear Tree		●						●	●				●	●	●	
HHSA Self-Sufficiency Soscol	●	●						●	●				●			
Homeless Shelter	●	●			●			●	●	●		●	●	●		
South Campus	●	●	●	●	●		●	●	●	●	●	●	●	●	●	

*Paths of travel encompass corridors/aisles, curb ramps, ramps, stairways, trails, and walks.

**Program specific barriers include features that are typically unique to certain facilities, such as bathing facilities, dressing/fitting/lockers rooms/saunas, eating areas, judicial facilities, kitchens, and libraries.

Table 5. ADA Accessibility Barrier Types at Law/Justice Buildings

	Built-in Elements	Door/Gate	Drinking Fountain	Elevator	Hazard	Other	Outdoor Constructed Features	Paths of Travel*	Parking Area	Picnic Area	Play Equipment Area	Program Specific**	Restrooms	Room	Sign	Telephone
Carithers Building	●	●		●	●	●		●	●				●	●	●	●
Grand Jury	●	●						●	●				●	●	●	
Historic Court House	●	●	●	●	●			●				●	●	●		
Juvenile Courthouse		●										●	●	●		
Juvenile Justice Center	●	●	●		●	●	●	●	●	●		●	●	●	●	●
Probation-ERC	●	●	●					●	●			●	●	●		

*Paths of travel encompass corridors/aisles, curb ramps, ramps, stairways, trails, and walks.

**Program specific barriers include features that are typically unique to certain facilities, such as bathing facilities, dressing/fitting/lockers rooms/saunas, eating areas, judicial facilities, kitchens, and libraries.

Table 6. ADA Accessibility Barrier Types at Law/Justice and Public Safety Buildings

	Built-in Elements	Door/Gate	Drinking Fountain	Elevator	Hazard	Other	Outdoor Constructed Features	Paths of Travel*	Parking Area	Picnic Area	Play Equipment Area	Program Specific**	Restrooms	Room	Sign	Telephone
Hall of Justice	●	●	●		●			●					●	●		

*Paths of travel encompass corridors/aisles, curb ramps, ramps, stairways, trails, and walks.

**Program specific barriers include features that are typically unique to certain facilities, such as bathing facilities, dressing/fitting/lockers rooms/saunas, eating areas, judicial facilities, kitchens, and libraries.

Table 7. ADA Accessibility Barrier Types at Public Safety Buildings

	Built-in Elements	Door/Gate	Drinking Fountain	Elevator	Hazard	Other	Outdoor Constructed Features	Paths of Travel*	Parking Area	Picnic Area	Play Equipment Area	Program Specific**	Restrooms	Room	Sign	Telephone
Capell Valley Fire Station	●	●						●	●			●	●			
Dry Creek Fire Station		●						●	●				●			
Greenwood Fire Station	●	●						●	●							
Napa County Sheriff	●	●		●	●			●	●				●	●	●	
Yountville Fire Station		●			●			●	●				●			

*Paths of travel encompass corridors/aisles, curb ramps, ramps, stairways, trails, and walks.

**Program specific barriers include features that are typically unique to certain facilities, such as bathing facilities, dressing/fitting/lockers rooms/saunas, eating areas, judicial facilities, kitchens, and libraries.

Table 8. ADA Accessibility Barrier Types at Other Facilities

	Built-in Elements	Door/Gate	Drinking Fountain	Elevator	Hazard	Other	Outdoor Constructed Features	Paths of Travel*	Parking Area	Picnic Area	Play Equipment Area	Program Specific**	Restrooms	Room	Sign	Telephone
Cuttings Wharf		●						●	●	●			●			

*Paths of travel encompass corridors/aisles, curb ramps, ramps, stairways, trails, and walks.

**Program specific barriers include features that are typically unique to certain facilities, such as bathing facilities, dressing/fitting/lockers rooms/saunas, eating areas, judicial facilities, kitchens, and libraries.

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2.9 Buildings Barrier Removal Summary

Accessibility barriers are prioritized in a process referenced in the ADA title II regulations. The principle is to ensure that basic access is provided, access to activities is provided, amenities are accessible, and alternatives to architectural modifications are allowed when appropriate. Translating these categories into action plans must be accomplished using a programmatic approach. The site priorities are divided into four categories:

- **Category 1:** The highest category is placed on those barrier removal items that provide accessibility at the main entrance of a facility or improve a path of travel to the portion of the facility where program activities take place (e.g., parking, walks, ramps, stairs, doors, etc.).
- **Category 2:** A second category is placed on those barrier removal items that improve or enhance access to program use areas (e.g., transaction counters, conference rooms, public offices, restrooms, etc.).
- **Category 3:** A third category is placed on those barrier removal items that improve access to amenities serving program areas (e.g., drinking fountains, telephones, site furnishings, vending machines).
- **Category 4:** A fourth category identifies areas or features not required to be modified for accessibility (no public programs located in this area, or duplicate features).

This categorization was applied to each identified barrier at Napa County buildings. Some barriers will require further evaluation by County staff for programmatic solutions. These barriers have been assigned two category values (i.e. “2 or 4”), indicating the barrier will need to be assigned one of the values but not both. The categories by site are summarized in the table on the pages that follow. The percentages in the tables refer to the total number of barriers at each individual site.

Table 9. Total Percentage of Barriers by Category at Community Resources/Infrastructure Buildings

Location Name	Category				
	1	1 or 4	2	2 or 4	3
Agricultural Commissioner	23%	0%	73%	0%	5%
American Canyon Library	43%	0%	49%	4%	4%
Animal Shelter	12%	0%	87%	0%	1%
Calistoga Library	28%	0%	67%	6%	0%
Fifth Street Garage	57%	0%	43%	0%	0%
Flood Control District	41%	0%	59%	0%	0%
Napa County Airport	25%	0%	71%	0%	4%
Napa Library	15%	0%	79%	3%	3%
Yountville Library	18%	0%	79%	0%	4%

Table 10. Total Percentage of Barriers by Category at General Administration/Finance and Community Resources/Infrastructure Buildings

Location Name	Category				
	1	1 or 4	2	2 or 4	3
Administration	16%	0%	71%	7%	6%

Table 11. Total Percentage of Barriers by Category at General Administration/Finance and Human Services Buildings

Location Name	Category				
	1	1 or 4	2	2 or 4	3
ITS	23%	0%	62%	3%	13%

Table 12. Total Percentage of Barriers by Category at Human Services Buildings

Location Name	Category				
	1	1 or 4	2	2 or 4	3
HHSA ADS	22%	0%	73%	0%	5%
HHSA American Canyon	36%	0%	58%	6%	0%
HHSA Calistoga	44%	0%	56%	0%	0%
HHSA Child Welfare Services	22%	7%	72%	0%	0%
HHSA Mental Health	47%	0%	53%	0%	0%
HHSA Mental Health Bella	31%	0%	69%	0%	0%
HHSA People Empowering People	36%	3%	61%	0%	0%
HHSA Self-Sufficiency Pear Tree	56%	0%	42%	2%	0%
HHSA Self-Sufficiency Soscol	34%	0%	66%	0%	0%
Homeless Shelter	16%	0%	81%	4%	0%
South Campus	27%	0%	68%	2%	3%

Table 13. Total Percentage of Barriers by Category at Law/Justice Buildings

Location Name	Category				
	1	1 or 4	2	2 or 4	3
Carithers Building	15%	0%	83%	0%	2%
Grand Jury	36%	0%	64%	0%	0%
Historic Court House	12%	0%	83%	0%	5%
Juvenile Courthouse	10%	10%	65%	16%	0%
Juvenile Justice Center	8%	0%	71%	15%	6%
Probation-ERC	45%	0%	49%	0%	6%

Table 14. Total Percentage of Barriers by Category at Law/Justice and Public Safety Buildings

Location Name	Category				
	1	1 or 4	2	2 or 4	3
Hall of Justice	14%	0%	79%	0%	7%

Table 15. Total Percentage of Barriers by Category at Public Safety Buildings

Location Name	Category				
	1	1 or 4	2	2 or 4	3
Capell Valley Fire Station	50%	0%	45%	5%	0%
Dry Creek Fire Station	67%	0%	33%	0%	0%
Greenwood Fire Station	88%	0%	13%	0%	0%
Napa County Sheriff	25%	2%	67%	6%	0%
Yountville Fire Station	33%	0%	67%	0%	0%

Table 16. Total Percentage of Barriers by Category at Other Facilities

Location Name	Category				
	1	1 or 4	2	2 or 4	3
Cuttings Wharf	60%	0%	40%	0%	0%

3.0 Public Right-of-Way Barrier Summary

Right-of-way facilities were evaluated during the summer and fall of 2017 using criteria from the 2016 California Access Compliance Advisory Reference Manual (CBC), 2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG), 2014 California Manual on Uniform Traffic Control Devices for Streets and Highways (CAMUTCD), and the 2010 ADA Standards.

3.1 Curb Ramps, Sidewalks, and Pedestrian Signals

The evaluation of public right-of-way facilities for this planning process includes curb ramps, sidewalks, and pedestrian signals throughout the County's public right-of-way. This section describes each of the three types of facilities evaluated and summarizes the barrier findings.

The first part of the summary for each type of facility has two parts:

- A graphic showing geospatial proximity priorities by category; and
- Descriptions of the barrier categorizations.

The second part includes:

- Summary tables of the identified barriers; and
- Maps showing the locations of identified barriers.

3.2 Public Rights-of-Way Prioritization

Draft prioritization criteria for assigning the barrier removal phasing schedule has been developed. Under title II Regulation § 35.150(d)(2), the criteria for prioritizing barriers within the public rights-of way are identified.

If a public entity has responsibility or authority over streets, roads, or walkways, its transition plan shall include a schedule for providing curb ramps or other sloped areas where pedestrian walks cross curbs, giving priority to walkways serving entities covered by the Act, including State and local government offices and facilities, transportation, places of public accommodation, and employers, followed by walkways serving other areas.

The draft prioritization criteria include the following:

- Location of citizen complaint/request (ADA title II Program Access);
- Locations serving government offices and public facilities;
- Locations serving transportation;
- Locations serving commercial districts and employers; and
- Locations serving other areas.

3.3 Priorities for Barrier Removal

Matrices on the following pages illustrate the prioritization criteria for curb ramp, sidewalk, and pedestrian signal barrier removal projects in the County's public right-of-way. Each facility evaluated has been assigned a rank based on its barrier priority and category. The priority assigned is based on the information described in section 3.2 and the barrier category is based on the condition of the facility. The descriptions for each category are provided after each of the tables.

The highest ranked facilities are shaded in purple, medium ranked in gold, and lower ranked in green. The facilities with no assigned rank have no access deficiencies identified and have no assigned color. The columns in the matrix indicate the assigned priority and are in order of importance from left to right, with the left column having the highest importance. The rows indicate the category of condition assigned to each facility during the evaluation process, with the top row having the highest importance. Note that categories are hierarchical: higher level categories (i.e. one and two) may include lower level category conditions (i.e. three and four), but lower level categories cannot include higher level category conditions.

Curb Ramps		ADA 35.150(d) Geospatial Proximity Priorities*				
		A	B	C	D	E
Priorities (Category)	Priority Description	Location of Citizen Complaint / Request (ADA Title II Program Access)	Location Serving Government Offices & Public Facilities	Location Serving Transportation	Location Serving Commercial Districts, Employers	Location Serving Other Areas
1	See Category 1 Description	A1 High Priority	B1	C1	D1	E1
2	See Category 2 Description	A2	B2 Medium Priority	C2	D2	E2
3	See Category 3 Description	A3	B3 Low Priority	C3	D3	E3
4	No deficiencies identified	A4	B4	C4	D4	E4

*The priorities listed under columns B, C, D, and E are specified under title II 28 CFR Section 35.150 (d).

Curb Ramp Barrier Descriptions

Category 1:

- A curb ramp is not provided.
- The curb ramp is significantly damaged or deteriorated and is unsafe.
- The curb ramp is built-up in the travel lane.
- There is no accessible path of travel to the curb ramp.
- The curb ramp has no detectable warning.

Category 2:

- Width of ramp is less than 48 inches.
- Running slope of ramp exceeds 8.33 percent or five percent for a blended transition.
- There is a grade break on the surface of the ramp.
- The curb ramp is not located within marked crossings (when present).
- A four-by-four-foot clear space at the bottom of the ramp outside of the travel lane is not provided.
- The surface of the ramp is not stable, firm, and slip resistant.

Category 3:

- Top turning space is less than four-by-four feet or constrained space is less than four-by-five feet or slope exceeds two percent.
- Cross slope of ramp exceeds two percent.
- Counter slope of the curb ramp is greater than five percent.
- Slope of ramp flared sides (if applicable) exceeds 10 percent.
- Diagonal curb ramp design without existing physical constraints.
- Detectable warning does not meet standard.

Category 4:

- No deficiencies identified.

Sidewalks		ADA 35.150(d) Geospatial Proximity Priorities*				
		A	B	D	E	F
Priorities (Category)	Priority Description	Location of Citizen Complaint / Request (ADA Title II Program Access)	Location Serving Government Offices & Public Facilities	Location Serving Transportation	Location Serving Commercial Districts, Employers	Location Serving Other Areas
1	See Category 1 Description	A1 High Priority	B1	C1	D1	E1
2	See Category 2 Description	A2	B2	C2	D2	E2
3	See Category 3 Description	A3	B3 Medium Priority	C3	D3	E3
4	See Category 4 Description	A4	B4 Low Priority	C4	D4	E4
5	No deficiencies identified	A5	B5	C5	D5	E5

*The priorities listed under columns B, C, D, and E are specified under title II 28 CFR Section 35.150 (d)

Sidewalk Barrier Descriptions

Category 1:

- The sidewalk width is less than 48 inches.

Category 2:

- Running slope of sidewalk exceeds grade of road and is greater than five percent.
- The sidewalk has cross slopes that exceed two percent for more than half of the sidewalk segment.
- The sidewalk cross slope at driveway entries exceeds two percent.
- The sidewalk has a significant number of vertical changes that exceed a quarter-inch **—and—** openings greater than a half-inch or are parallel to direction of travel (more than one per 100 feet).

Category 3:

- The sidewalk has cross slopes that exceed two percent for less than half of the sidewalk segment.
- The sidewalk has a significant number of vertical changes that exceed a quarter-inch **—or—** openings greater than a half-inch (more than one per 100 feet), but not both.

Category 4:

- The sidewalk has overhanging or protruding objects along its route.
- The sidewalk has a significant number of vertical changes that exceed a quarter-inch and/or openings greater than a half-inch (fewer than one per 100 feet).

Category 5:

- No deficiencies identified.

Pedestrian Signals		ADA 35.150(d) Geospatial Proximity Priorities*				
		A	B	C	D	E
Priorities (Category)	Priority Description	Location of Citizen Complaint / Request (ADA Title II Program Access)	Location Serving Government Offices & Public Facilities	Location Serving Transportation	Location Serving Commercial Districts, Employers	Location Serving Other Areas
1	See Category 1 Description	A1 High Priority -----	B1	C1	D1	E1
2	See Category 2 Description	A2	B2 Medium Priority -----	C2	D2	E2
3	See Category 3 Description	A3	B3	C3	D3 Low Priority -----	E3
4	No deficiencies identified	A4	B4	C4	D4	E4

*The priorities listed under columns B, C, D, and E are specified under title II 28 CFR Section 35.150 (d)

Pedestrian Signal Barrier Descriptions

Category 1:

- Accessible pedestrian signal is not provided.
- Pedestrian crossing time is insufficient.

Category 2:

- Level clear space at push button not provided.
- Reach to push button from clear space is obstructed.
- Operating force of pushbutton exceeds five pounds of force.
- The pushbutton does not have a sign adjacent to or integral with the pushbutton.
- Pushbutton sign does not clearly indicate which crosswalk signal is actuated.
- Pushbutton pilot light (if applicable) does not activate.
- A locator tone is not provided.
- A tactile arrow is not provided.
- Pushbutton locator tone activates at incorrect time.
- Pushbutton locator tone duration and intensity needs adjustment.
- Audible features of accessible pedestrian signal need adjustment.

Category 2, continued

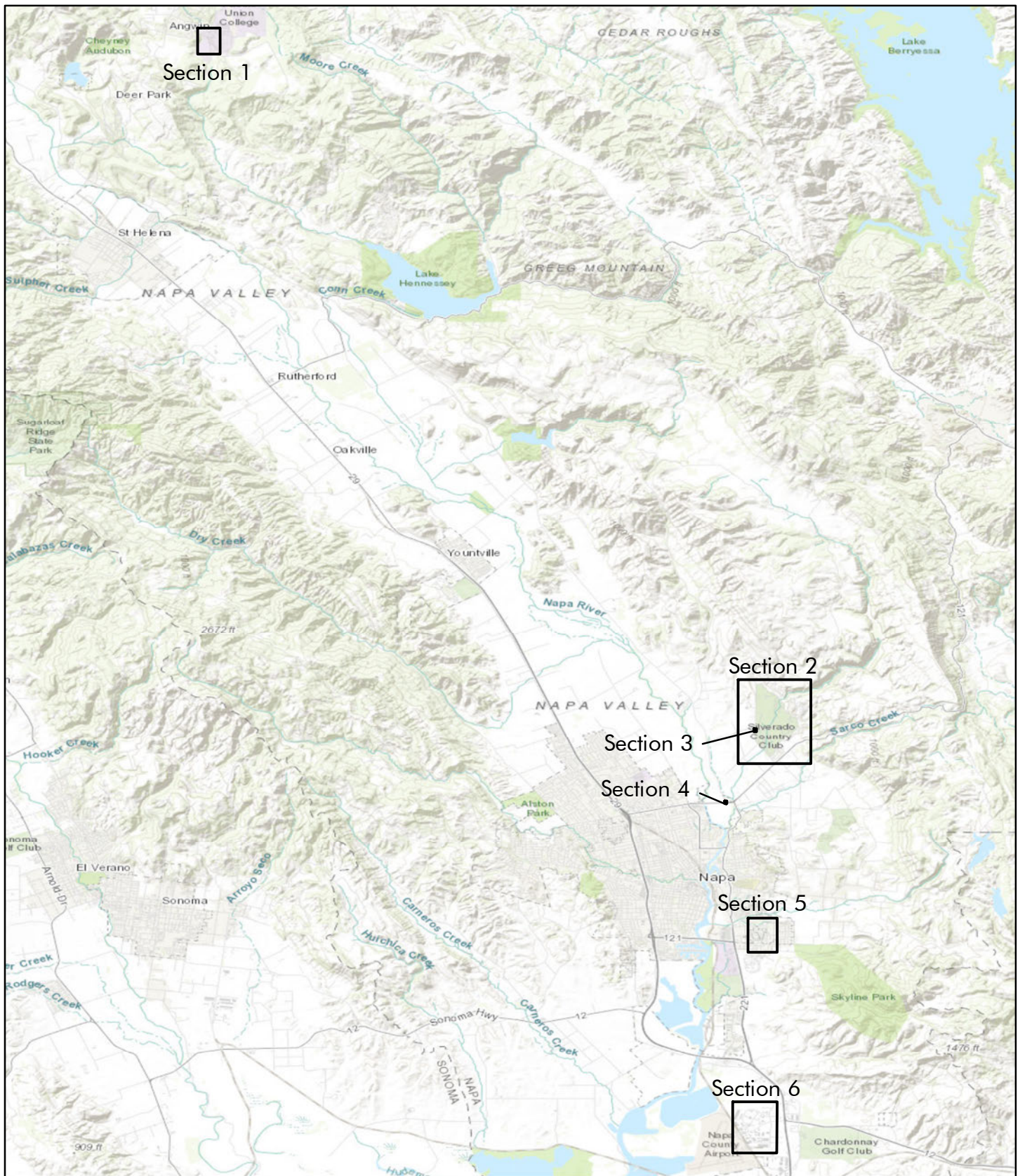
- Speech walk message of accessible pedestrian signal needs adjustment.
- Extended pushbutton feature needs adjustment.
- Pushbutton needs color coded identification above the control button.

Category 3:

- Pushbutton locator is more than 10 feet from curb, shoulder, or pavement.
- Pushbutton is further than five feet from the crosswalk line farthest from the intersection (when applicable).
- Pushbutton height is not within range of 42 and 48 inches above the ground.
- Pushbutton and arrow are not parallel with the direction of travel.
- Distance between two pushbuttons on the same corner is less than 10 feet.

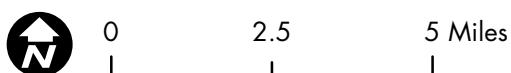
Category 4:

- No deficiencies identified.



Napa County ADA Self-Evaluation & Transition Plan Right-of-Way Barrier Removal Projects Map Sections

April 2018

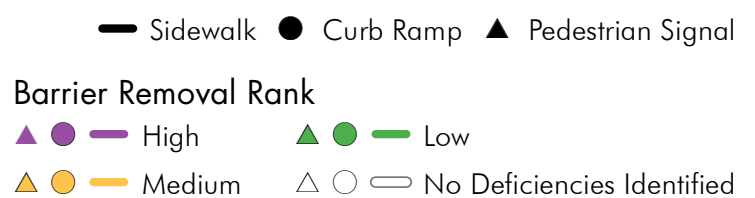
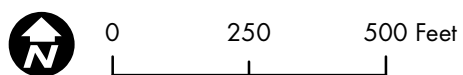




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Right-of-Way Barrier Removal Projects Map Section 1

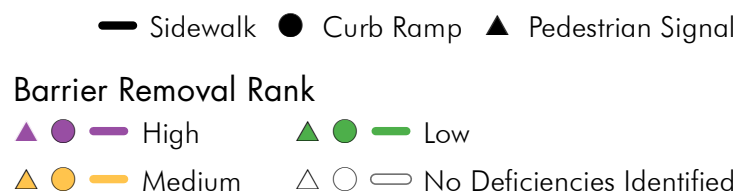
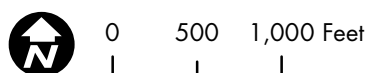




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Right-of-Way Barrier Removal Projects Map Section 2





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Right-of-Way Barrier Removal Projects Map Section 3

— Sidewalk ● Curb Ramp ▲ Pedestrian Signal

Barrier Removal Rank

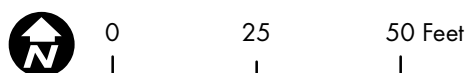
▲ ● — High ▲ ● — Low
▲ ● — Medium △ ○ — No Deficiencies Identified



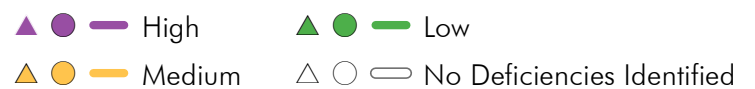
Napa County ADA Self-Evaluation & Transition Plan

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Right-of-Way Barrier Removal Projects Map Section 4



Barrier Removal Rank



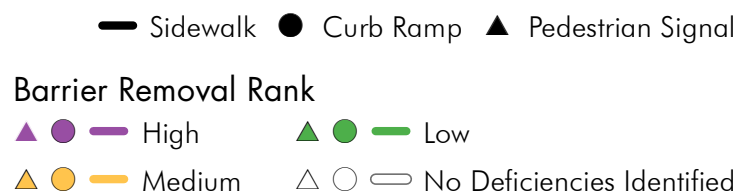
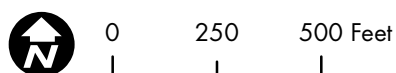
— Sidewalk ● Curb Ramp ▲ Pedestrian Signal

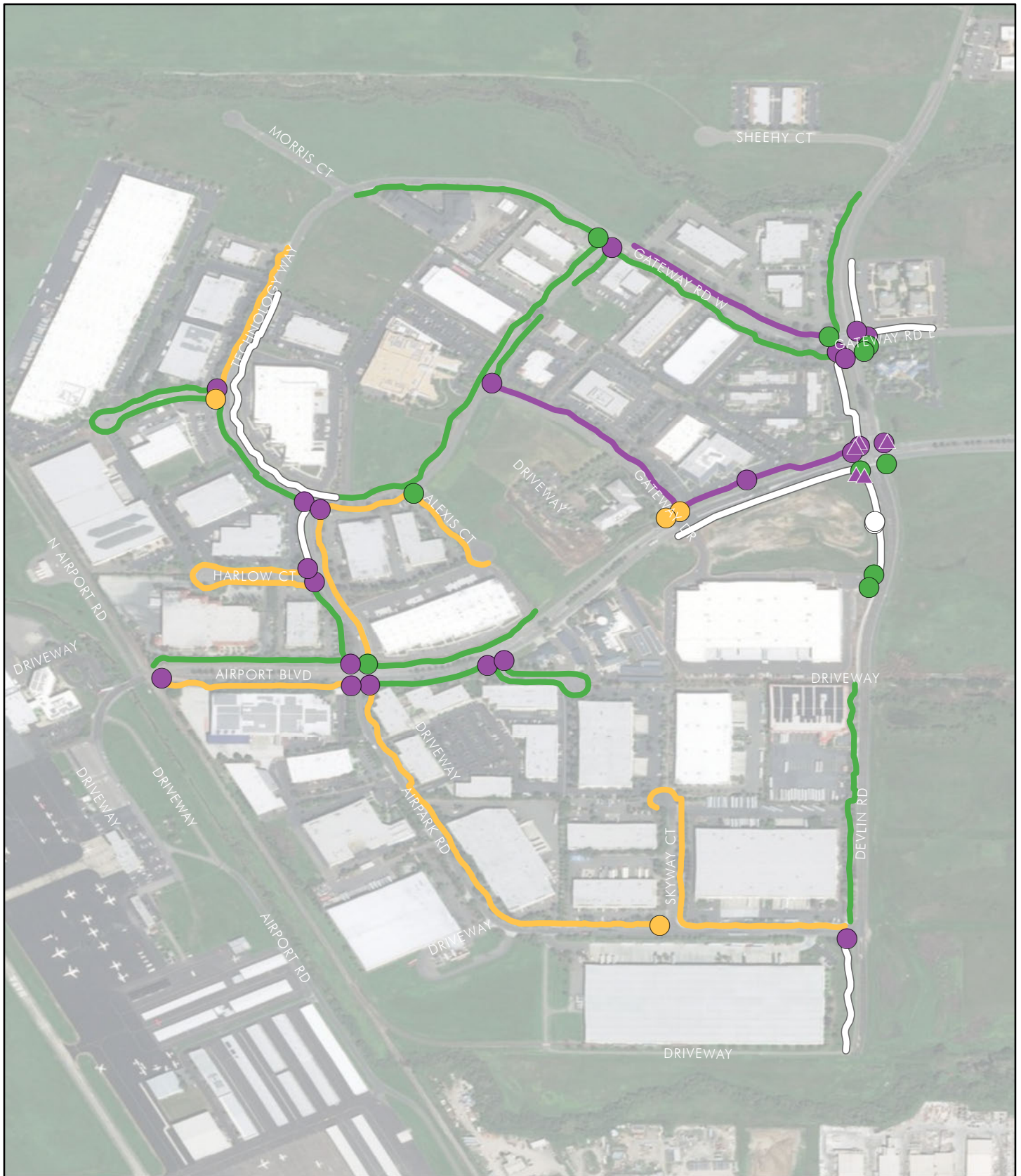


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Right-of-Way Barrier Removal Projects Map Section 5

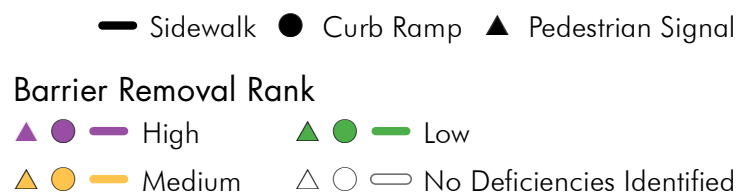
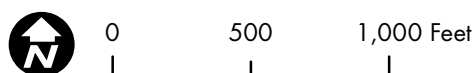




Napa County ADA Self-Evaluation & Transition Plan

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Right-of-Way Barrier Removal Projects Map Section 6



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Table 17. Curb Ramp Barrier Summary

Category	Priority	Total Ramps	Percent Total	Schedule Year
High Priority				
1	B1	1	1.0%	TBD
1	C1	27	27.6%	TBD
1	D1	36	36.7%	TBD
Subtotal		64	65.3%	-
Medium Priority				
2	C2	7	7.1%	TBD
2	D2	13	13.3%	TBD
Subtotal		20	20.4%	-
Low Priority				
3	C3	2	2.0%	TBD
3	D3	8	8.2%	TBD
Subtotal		10	10.2%	-
No Deficiencies Identified				
4	C4	4	4.1%	n/a
Subtotal		4	4.1%	-
Total for All Projects		98	100%	-

Napa County ADA Barrier Analysis Summary Report
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Table 18. Sidewalk Barrier Summary

Category	Priority	Total Miles	Percent Total	Schedule Year
High Priority				
1	C1	1.0	10.1%	TBD
1	C2	0.7	7.0%	TBD
1	D1	0.1	1.0%	TBD
Subtotal		1.8	18.0%	-
Medium Priority				
2	C3	0.1	1.5%	TBD
2	D2	3.3	33.9%	TBD
3	D3	0.3	2.9%	TBD
Subtotal		3.7	38.3%	-
Low Priority				
3	B4	0.2	1.8%	TBD
4	C4	1.0	10.2%	TBD
4	D4	1.9	19.5%	TBD
Subtotal		3.1	31.5%	-
No Deficiencies Identified				
5	B5	0.0	0.5%	n/a
5	C5	0.5	5.3%	n/a
5	D5	0.6	6.4%	n/a
Subtotal		1.2	12.2%	-
Total for All Projects		9.8	100%	-

Table 19. Pedestrian Signal Barrier Summary

Category	Priority	Total Signals	Percent Total	Schedule Year
High Priority				
1	C1	5	38.5%	TBD
Subtotal		5	38.5%	-
Medium Priority				
1	D1	4	30.8%	TBD
1	E1	4	30.5%	TBD
Subtotal		8	61.6%	-
Total for All Projects		13	100%	-