



# CITY OF SACRAMENTO

## DEPARTMENT OF FINANCE

August 13, 1985  
FA:85256:mlh

BUDGET DIVISION

Budget and Finance Committee  
Personnel and Public Employees Committee  
Sacramento, California

Honorable Members in Session:

Subject: Adoption of Handicapped Access Compliance Program

### SUMMARY

The attached report summarizes the City's progress in conforming with various handicapped access assessibility requirements. While excerpts from the final consultant transition plan are included with this material, additional supporting documentation in the form of the service, structural, and employment self-evaluation reports is on file in the City Clerk's Office. The joint Committees are being asked to approve the attached resolution adopting the self-evaluation and structural reports as the City of Sacramento's Transition Plan; establishing an implementation timetable for correcting service, structural, and employment related deficiencies; and formally designating a 504 Coordinator and review process.

### ANALYSIS

The history of the handicapped compliance regulatory program as well as the City of Sacramento's response to these requirements is thoroughly documented in the service, structural, and employment self-evaluation reports, the transition plan, and the attached staff report.

### FINANCIAL

#### A. General

The estimated total cost for implementing the City's proposed Transition Plan would be broken out by program and fund as follows:

<u>Program</u>	<u>Fund</u>	<u>Amount</u>
Service Related	General Fund	\$ 6,388
Structural Related	General Fund	\$ 718,000
	Parking Fund	118,500
	Fairytale Town Trust	93,000
	Camp Sacramento Fund	41,000
	Community Center Fund	140,000
Employment Related	General Fund	475

**Total Handicapped Compliance Costs: \$1,117,363.**

Of the \$724,863 of General Funds which are required for this effort, \$600,000 has already been appropriated (\$200,000 in 1984-85 and \$400,000 in 1985-86). An additional \$400,000 in General Funds is included in the proposed 1985-90 Capital Improvement Program for the 1986-87 fiscal year. This report requests that funds be allocated from the Parking Fund to pay for necessary accessibility improvements and that the 1985-86 Capital Improvement Program be amended to permit the same. None of the other funds have had monies appropriated from them for accessibility projects and in some cases, particular funds would be unable to pay for required handicapped improvements within the 1985-86 fiscal year. However, it would be appropriate to begin planning to incorporate required handicapped programs as a part of the capital projects scheduled for Camp Sacramento, Fairytale Town, etc. over the next five years.

**B. Memorial Auditorium**

There are significant safety improvements which will be required at the Memorial Auditorium site in addition to required handicapped items. Given these conditions, the question of installing handicapped building improvements within the Memorial Auditorium must be reviewed in light of the long range use of this facility. Staff is therefore recommending that the issue of installing required Auditorium handicapped improvements be addressed in a separate report which will be presented by October 1985.

**RECOMMENDATION**

It is requested that the joint Budget and Finance and Personnel and Public Employee Committees recommend that the City Council approve by resolution:

1. Adoption of the service, structural, and employment self evaluation reports along with the Hi-Rise Interiors structural transition report as the City of Sacramento's Handicapped Access Transition Plan.
2. Implementation of required handicapped accessibility improvements following the time period indicated below:

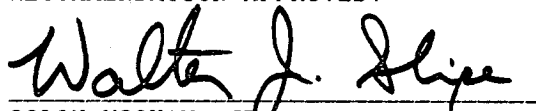
- a. Completion of all service and employment accessibility enhancements by August 15, 1986.
  - b. Completion of all Phase I structural improvements by December 1, 1986 in conformance with the rankings set in the consultant's structural transition plan.
3. Amendment of the 1985-86 Facility Management Division's Approved Budget by the addition of 3.0 FTE and \$122,827 to implement the structural improvements required in connection with this program.
  4. Amendment of the 1985-86 Capital Improvement Program by the transfer of \$118,500 in Parking Funds to capital project 101-1110-4363-4820 in order to pay for accessibility improvements needed in connection with various parking lots.
  5. Designation of the Director of Personnel as the City of Sacramento's 504 Coordinator with specific program area compliance review handled by the following designated individuals:
    - a. Service - Citizen Assistance Officer
    - b. Structural - Director of General Services
    - c. Employment - Director of Personnel

Respectfully submitted,



JACK CRIST  
 Chairman  
 Handicapped Accessibility  
 Task Force

RECOMMENDATION APPROVED:



FOR

SOLON WISHAM, JR.  
 Assistant City Manager

Task Force Members:

Jack Crist  
 Robert Thomas  
 Mac Mailes  
 Bill Carnazzo  
 John Varozza  
 Mel Johnson  
 Lou Edgar  
 Tim Sullivan  
 Les Frink  
 Rudy Minnick  
 Duane Wray  
 Monika Hudson  
 Gary Little

# RESOLUTION NO.

ADOPTED BY THE SACRAMENTO CITY COUNCIL ON DATE OF

RESOLUTION OF THE COUNCIL OF THE CITY OF SACRAMENTO ADOPTING A HANDICAPPED ACCESSIBILITY TRANSITION PLAN; ESTABLISHING AN IMPLEMENTATION TIMETABLE FOR CORRECTING SERVICE, STRUCTURAL, AND EMPLOYMENT RELATED DEFICIENCIES; AND FORMALLY DESIGNATING A 504 COORDINATOR AND REVIEW PROCESS

WHEREAS, in 1973 the Congress of the United States passed Rehabilitation Act Section 504 which required that federal fund recipients make their programs and activities accessible to the handicapped on a non-discriminatory basis; and

WHEREAS, Section 504 requires that the City communicate its policy of non-discrimination to all outside organizations and persons; receive written assurances from its recipient agencies as to their internal policy of non-discrimination; and take whatever other steps may be necessary to ensure an absence of discrimination against participants in the City's programs and services; and

WHEREAS, the Section 504 implementing regulations indicated that all recipients of federal revenue sharing funds had one year from the implementing effective date to evaluate programs and activities, policies and practices; to determine areas of noncompliance with the handicapped discrimination requirements; to make "nonstructural changes" as needed to achieve compliance; and to determine what "structural changes" would be needed. These "structural changes" were to be incorporated into a transition plan which described how these changes were to be made over a period not to exceed three years; and

WHEREAS, the City of Sacramento has now completed this evaluation process and has developed an accessibility enhancement transition plan.

NOW, THEREFORE BE IT RESOLVED BY THE COUNCIL OF THE CITY OF SACRAMENTO:

1. The service, structural, and employment self evaluation reports along with the "Architectural Modifications for Accessibility" structural transition report, submitted to the City Council herewith, are hereby adopted as the City of Sacramento's Handicapped Access Transition Plan.

2. Required handicapped accessibility improvements shall hereby be implemented within the following time period:
  - a. All service and employment accessibility enhancements shall be completed by August 15, 1986.
  - b. All Phase I structural improvements shall be completed by December 1, 1986 in conformance with the rankings set in the "Architectural Modifications for Accessibility" report.
3. The 1985-86 Facility Management Division's Approved Budget is hereby amended by the addition of 3.0 FTE and \$122,827 to implement the structural improvements required in connection with this program in the following manner:

a. 101-1936-0000-4101	Salary and Wages	\$122,827
		-----
	Subtotal	122,827
101-1936-0000-4710	CIP Reimbursement	( 122,827)
	NET TOTAL	\$ -0-
		=====

The reimbursement funds for these operating expenses will come from capital improvement project 101-1110-4363-4820.

4. The 1985-86 Capital Improvement Program is hereby amended with the transfer of \$118,500 from the Parking Fund (412-7012-0000-4599) to the Handicapped Access capital project (101-1110-4363-4820) in order to pay for accessibility improvements needed in connection with various parking lots.
5. The Director of Personnel is hereby designated as the City of Sacramento's 504 Coordinator with specific program area compliance review handled by the following designated individuals:
  - a. Service - Citizen Assistance Officer
  - b. Structural - Director of General Services
  - c. Employment - Director of Personnel

6. The City of Sacramento shall hereby amend its discrimination statement and extend its policy of non-discrimination to "handicapped individuals" and shall require that agencies which receive City funds adopt, when required by law, a handicapped non-discrimination policy.

\_\_\_\_\_  
MAYOR

APPROVED AS TO FORM:

\_\_\_\_\_  
CITY ATTORNEY

ATTEST:

\_\_\_\_\_  
CITY CLERK

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## I. Executive Summary

### A. Overview

The Section 504 regulations are designed to eliminate discrimination on the basis of handicap in programs and activities receiving federal financial assistance. For purposes of the regulations, federal financial assistance is defined as any "grants, loans, contracts (other than a procurement contract or a contract of insurance or guaranty), or any other arrangement by which the agency provides or otherwise makes available assistance in the form of funds, services of federal personnel, and/or real or personal property or any interest in or use of such property." Non-compliance with the regulations can result in the withholding of such funds.

"Qualified handicapped individuals" are protected from discrimination by the Section 504 implementing regulations. The definition of qualified handicapped person is divided into the following categories:

- o With respect to employment - A handicapped person who, with reasonable accomodation, can perform the essential functions of the job in question.
- o With respect to services - A handicapped person who meets the essential eligibility requirements for the receipt of such services.

The regulations prohibit not only practices that are overtly discriminatory, but also those that have the "effect" of discriminating. Under the law, equal opportunity, and not merely equal treatment, is essential to the elimination of discrimination.

In October 1983, the Office of Revenue Sharing of the Department of the Treasury published final implementing regulations in the Federal Register prohibiting handicapped discrimination. The regulations indicated that all recipients of revenue sharing funds had one year from the implementing effective date (or by October 17, 1984) to evaluate programs, activities, policies and practices to determine areas of noncompliance with the handicapped discrimination requirements and to make "nonstructural changes" as needed to achieve compliance. As a part of these regulations, recipient agencies were also called upon to determine if "structural changes" were needed as part of the self-evaluation and to prepare a transition plan describing how these changes were to be made over a period not to exceed three years (or no later than October 1986). Specific sanctions, including the loss of revenue sharing funds, were to be instituted against non-complying agencies.

In response to the October 1983 Office of Revenue Sharing notifications, the City Manager designated the Department of Finance as the responsible 504 coordinating office. He also appointed a task force composed of the representatives from the departments of Finance, Personnel, Planning and Development, General Services, Public Works, Law, and Parks and Community Services to review the City's compliance and complete the self-evaluation in accordance with the revised Revenue Sharing handicapped requirements.

The Task Force determined that outside consultants should be used for the required structural and service evaluations. The Affirmative Action Officer was asked to conduct the employment analysis. It was felt that this selective use of consultants would ensure rapid identification of any building and/or program deficiencies, minimizing the use of City staff. Scott Harger of Hi-Rise Interiors handled the structural analysis while Jerry Colivas and Carlene Tonini of CHT Consultants prepared the service evaluation. Copies of all three analyses are available in the City Clerk's Office.

B. Results of the Self-Evaluation Process

While the consultants noted that the City of Sacramento has made some progress on enhancing service, structural, and employment handicapped accessibility, a number of major areas of deficiencies remain. These include:

1. Service Related

- a. Lack of a city-wide statement of non-discrimination which is included in all municipal publications.
- b. Lack of a city-wide public information effort in other than written form (Written material is typically not available in large print formats.).
- c. Lack of city-wide accessible site information and a policy to use the same.
- d. Lack of city-wide sensitivity training on the needs of the mentally and/or physically disabled particularly for employees with direct public contact.
- e. Lack of standardized grievance forms for those who have a accomodation and/or service program concerns.
- f. Lack of shared TDD, braille, and/or signing staff capabilities in connection with all City sponsored activities.

2. Structural Related

- a. Lack of a architectural transition plan which would include the identification of physical obstacles in the City's facilities that limit the accessiblity of its programs or activities to handicapped persons; descriptions of the methods that will be used to make these facilities accessible; and a specific schedule for taking the steps necessary to make facilities accessible.
- b. Lack of a comprehensive plan which determines the size, shape and locations of spaces within or adjacent to a building, such as stairs or parking.

- c. Lack of a plan which controls the size, shape and location of objects such as door handles, restrooms, toilets, water fountains, control knobs, etc.
- d. Lack of a plan which limits the personal energy output by a handicapped person (for example, the angle of ramps) and the degree of exposure to hazard (such as modifying door hardware design to alert blind people whenever doors lead to hazardous spaces).
- e. Specifications on the size and nature of signs and signals to guide handicapped persons entering or using a building.

3. Employment Related

- a. Lack of a regular process to advise the City Council of the nondiscrimination policy when making Board and Commission appointments.
- b. Failure to mention handicapped access to training within the employment opportunity plan.
- c. Lack of a formal internal process to advise current employees of the City's handicapped nondiscrimination policy.

C. Resulting Actions

1. Structural

In response to the problems identified in the three self-evaluation reports, Hi-Rise Interiors was hired to develop a transition plan which would specifically address needed structural improvements. The resulting attached report entitled, "Architectural Modifications for Accessibility" ranks all municipal facilities by the limits on accessibility and the frequency of use. A phasing program was developed which placed the highest ranked projects, as determined by the combined rank of "current accessibility" and "current need" into a Phase I timetable. It is anticipated that all of the Phase I improvements could be completed within a sixteen month timeframe at a total cost of \$1,110,500.

2. Service/Employment

In addition to deriving a timetable for the installation of various structural modifications, the Task Force has identified that the following steps should be taken to address the informational, service, and employment-related deficiencies identified in the self-evaluation reports:

- a. The Public Information Officer should send out an annual reminder to all departments alerting them to the necessity of including a handicapped non-discrimination statement in each of their municipal publications. The Public Information Officer has indicated that she will be exploring the possibility of publishing the upcoming citizen services brochere in a large print format. On an annual basis, public service announcements should be sent to the media stating the City's non-discrimination policy and listing numbers that people should contact if they have a problems or questions about the availability of City services, programs, etc.
- b. The Facility Management Division should work with the City Manager's Office to get a city-wide listing of accessible service sites included in the citizen services brochere.
- c. The Personnel Department's Training Officer should be responsible for coordinating city-wide employee sensitivity training on the needs of the mentally and/or physically disabled. The Personnel Department should also develop a standardized grievance form for the use of those who have accomodation and/or service program concerns. Once these actions are complete, the department should incorporate training access availability information into the employment opportunity plan.
- d. Parks and Community Service Department staff should conduct routine training exercises to ensure that all aquatics personnel is familiar with the proper assembly and operation of the pool-lift equipment. To the extent that any pool's lift-equipment is not complete, the additional parts should be purchased. However, the costs associated with this project could not be unidentified at this time.
- e. The City Clerk should be asked to include a handicapped non-discriminatory advisory statement in her annual City Council notification of Board and Commission vacancies. She should also be asked to incorporate a similar policy statement into Board and Commission advertising and informational materials.
- f. The City Manager's Office should be directed to continue to explore how TDD, braille, visually enhanced and/or signing staff capabilities can be shared in connection with all City sponsored activities.
- g. Various capital improvements and equipment should be purchased to enhance service accessibility at a total cost of \$6,863.

All of the employment accessibility enhancements and Phase I structural improvements could be accomplished for a total combined outlay of \$1,117,363.

## II. Background: Revenue Sharing Act Requirements/City of Sacramento Response

### A. Creation of Section 504

In 1973, Congress passed Rehabilitation Act Section 504 which required that federal fund recipients make their programs and activities accessible to the handicapped. In conjunction with the Act, Executive Order 11914 was issued, calling upon the Department of Health, Education and Welfare (later renamed Health and Human Services or HHS) to issue general standards and procedures to serve as guidelines for all funding agencies in developing individual sets of Section 504 regulations. These general funding standards were published in January 1978. In 1980, President Carter signed Executive Order 12250 which transferred lead agency coordination authority from HHS to the Department of Justice, who in turn, reaffirmed the use of the 1978 enforcement regulations. These regulations identify minimum requirements; however these minimum requirements may be exceeded by the rules of particular individual agencies.

### B. Regulatory Intent/Definitions

The Section 504 regulations are designed to eliminate discrimination on the basis of handicap in programs and activities receiving federal financial assistance. For purposes of the regulations, federal financial assistance is defined as any "grants, loans, contracts (other than a procurement contract or a contract of insurance or guaranty), or any other arrangement by which the agency provides or otherwise makes available assistance in the form of funds, services of federal personnel, and/or real or personal property or any interest in or use of such property." Non-compliance with the regulations can result in the withholding of such funds, including Federal Revenue Sharing monies. Section 504 specifically protects handicapped persons from discrimination based on their handicap status. A person is "handicapped" within the meaning of the regulations if he or she:

1. Has a mental or physical impairment which substantially limits one or more of such person's major life activities.
2. Has a record of such impairment.
3. Is regarded as having such an impairment.

"Major life activities" include functions such as caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working. The issue of "substantial limitation" depends upon the nature and severity of that person's handicapped condition. Temporary disabilities arguably are not "substantially" limiting within the meaning of the statute (HHS in one of its policy memorandums has determined that "pregnancy" was not considered a handicap for purposes of the regulations).

In addition to expressing concern about the limits on major life activities, the regulations define physical or mental impairments within the discrimination prohibitions to include any physiological disorder or

condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: neurological, musculoskeletal, special sense, respiratory (including speech organs), cardiovascular, reproductive, digestive, genitourinary, hemic and lymphatic, skin, and endocrine; or any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities. The term "physical or mental impairment" includes, but is not limited to such diseases and conditions as orthopedic, visual, speech, and hearing impairments, cerebral palsy, epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart disease, diabetes, mental retardation, emotional illness, and drug addiction and alcoholism (The latter two conditions were ruled to be handicapping for purposes of Section 504 by the U.S. Attorney General in 1977.).

Only "qualified handicapped individuals" are protected from discrimination by the Section 504 implementing regulations. The definition of qualified handicapped person is divided into the following categories:

- o With respect to employment - A handicapped person who, with reasonable accomodation, can perform the essential functions of the job in question.
- o With respect to services - A handicapped person who meets the essential eligibility requirements for the receipt of such services.

The regulations prohibit not only practices that are overtly discriminatory, but also those that have the "effect" of discriminating. Equal opportunity, and not merely equal treatment, is essential to the elimination of discrimination. Thus, in some situations, identical treatment of handicapped and nonhandicapped persons is not only insufficient but is itself discriminatory. **Separate but equal treatment is permitted under the implementing regulations only where it is necessary to ensure equal opportunity and truly effective benefits and services.**

Both the Section 504 and Revenue Sharing regulations prohibit a recipient from directly, or through contractual or other arrangements, utilizing criteria or methods of administration that:

- o Have the effect of subjecting qualified handicapped persons to discrimination based on handicap.
- o Have the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the recipient's program with respect to handicapped persons.
- o Perpetuate the discrimination of another recipient if both recipients are subject to comman administrative control or are agencies of the same state.

These particular provisions apply primarily to state agencies that receive federal funds and then distribute funds to other governmental entities. As can be seen from the descriptions, the discrimination prohibitions apply not only to direct actions of a recipient, in this case the City of Sacramento, but also to

related actions committed through contractual agreements or similar arrangements based on the premise that a recipient should not be able to do indirectly that which it cannot do directly. The concept of "equally effective" is intended to encompass the concept of "equivalent" as opposed to "identical". Under the regulatory provisions, in order to be "equally effective", an aid, benefit, or service need not produce the identical result or level of achievement for handicapped and nonhandicapped persons; to be equally effective, an aid, benefit, or service must merely afford equal **opportunities** to achieve equal results.

#### C. Overview of Section 504 Monitoring Standards

The overall language of Section 504 indicates that recipient agencies are prohibited from aiding or perpetuating discrimination against a qualified handicapped person by providing "significant assistance" to an organization or person that discriminates based on handicap. Although the concept is not specifically addressed in the government-wide regulations, Section 504 contains general language to indicate that a recipient agency, like the City of Sacramento, may have to develop standards for measuring the "substantiality" of its assistance to other organizations or persons in order to determine if these agencies also fall under Section 504 compliance requirements.

Ensuring that discrimination does not exist may require the City to communicate its policy of nondiscrimination to all outside organizations and persons; to receive written assurances from such organizations as to their internal policies of nondiscrimination; and to take whatever other steps may be required to ensure an absence of discrimination against participants in the City's programs and activities. The City is also required to take the necessary steps to ensure that communication with its own applicants, employees, and beneficiaries is available to persons with impaired vision and hearing. Regardless of the accommodations and adjustments that are (or would be) made by the City for handicapped persons, equal opportunity will not be considered to have been achieved in individual instances unless handicapped persons are aware that such accommodations and adjustments have been or will be made.

#### D. Revenue Sharing Impact

In October 1983, the Office of Revenue Sharing of the Department of the Treasury published final implementing regulations in the Federal Register prohibiting handicapped discrimination. The final administrative requirements included several components that the City of Sacramento needed to comply with such as stipulations for noticing, the designation of a 504 Coordinator, adoption of grievance procedures, and the completion of a 504 self-evaluation and transition plan.

The regulations also indicated that all recipients of revenue sharing funds had one year from the implementing effective date (or by October 17, 1984) to evaluate programs and activities, policies and practices to determine areas of noncompliance with the handicapped discrimination requirements and to make "nonstructural changes" as needed to achieve compliance. As a part of these regulations, recipient agencies were also called upon to determine if "structural changes" were needed as part of the self-evaluation and to prepare a transition plan describing how these changes were to be made over a period not to exceed three years (or no later than October 1986). Specific sanctions, including the loss of revenue sharing funds, were to be instituted against non-complying agencies.

E. Creation of City of Sacramento Task Force

The adoption of Resolution 83-195 formally incorporated a Equal Employment Opportunity Plan for the Disabled as part of the Affirmative Action program, officially beginning the City of Sacramento's response to the requirements of Section 504 and the Federal Revenue Sharing Act. This plan outlined the following enhancements of the City's nondiscrimination policy:

1. Clarification of the Equal Employment Opportunity Plan in connection with handicapped persons, specifically stating that a qualified handicapped individual shall not, by reason of physical or mental impairment, be excluded from participation in, denied the benefits of, or be subjected to discrimination in recruitment, hiring, or employment.
2. Description of proper and improper employment practices as they relate generally to the employment of the disabled.
3. Designation of the Affirmative Action Officer as the responsible party to work with the City Manager, department heads, and community groups in the implementation of the Plan.
4. Broader dissemination of the EEO policy along with an annual review of the effectiveness of this program.

In response to the October 1983 Office of Revenue Sharing notifications, the City Manager designated the Department of Finance as the responsible 504 coordinating office. He also appointed a task force composed of the representatives from the departments of Finance, Personnel, Planning and Development, General Services, Public Works, Law, and Parks and Community Services to review the City's compliance and complete the self-evaluation in accordance with the revised Revenue Sharing handicapped requirements. It was this task force which established the initial transition plan timetable, developed the selection procedures for the service, structural and employment self-evaluation aspects of the compliance review, and recommended representative organizations which should be included in the citizen review aspects of the process.

F. Development of Service, Structure, and Employment Reports

The Task Force determined that outside consultants should be used for the required structural and service evaluations. The Affirmative Action Officer was asked to conduct the employment analysis. It was felt that this selective use of consultants would ensure rapid identification of any building and/or program deficiencies, minimizing the use of City staff. Scott Harger of Hi-Rise Interiors handled the structural analysis while Jerry Colivas and Carlene Tonini of CHT Consultants prepared the service evaluation.

In each case, City staff members were contacted to determine what municipal efforts had already been expended to bring the City into better compliance with the regulations. For the structural analysis, Mr. Harger used the Facility Management Division's recommendations to determine which facilities were frequented by the public; these were the City buildings which were evaluated to identify their compliance with the implementing requirements. Mr. Colivas and Ms. Tonini followed a similar process and prepared questionnaires which were completed by each of the City's departments. The information from these questionnaires was compiled into a service analysis, grouped by program. The employment analysis utilized the same process, examining both the City's affirmative action efforts and individual departmental policies as they impacted the handicapped community. In each of the final reports, the service/structure/employment-related efforts were listed with the corresponding regulation number; deficiencies were noted; as were recommendations indicating the enhancement features needed to increase handicapped access. Copies of each of these documents are available in the City Clerk's Office.

G. Handicapped Community Evaluation and Review

In preparing all of the self-evaluation reports, representative handicapped groups, service providers, and/or individuals were contacted to obtain deficiency input, to review each preliminary self-evaluation report, and to provide feedback from the handicapped community about the adequacy of the recommended enhancement measures. This process was extremely useful in ensuring the integrity of the final self-evaluation documents. A list of the various service providers who were contacted in the context of preparing the self-evaluation reports is included as Attachment "B". A similar list of the advisory committee participants is included as Attachment "C".

### III. Status of Municipal Efforts

#### A. Service Programs

##### 1. Specific Legal Requirements

It is important to emphasize that the service legal requirements of the implementing regulations do not indicate that **achieving program accessibility necessarily requires the alteration or construction of facilities**. Existing facilities need not immediately be made accessible; **programs** must be accessible. Under the regulations, if methods other than facility renovation and construction are successful in achieving program accessibility (e.g. the rescheduling of programs or activities to already accessible facilities), the time and expense of facility work may be avoided. Specifically, government guidelines appendix III:B:1 states that "...structural modifications of existing facilities need be undertaken only where other methods are inadequate to assure that a program is available to handicapped persons".

For example, the City may arrange for the "delivery of services at alternative sites that are accessible, to use aides, or deliver services to persons at their homes...Mobility impaired persons may be provided access to the library's services through a bookmobile or by special messenger service or clerical aid or any other method that makes the resources of the library 'readily accessible'." There are some specific requirements for consultations with the intended recipients of these services in order to assure better effectiveness. The City has the latitude to make decisions regarding relative effectiveness and cost on an individual-by-individual basis, however "so long as a particular aid is considered to be effective in making a program or activity accessible to an individual, the recipient will be fulfilling its program accessibility obligations."

##### 2. Accomplishments

The service analysis was prepared by Jerry Colivas and Colleen Tonini and is entitled "An Evaluation of Service Policies and Practices for the City of Sacramento in Accordance with Requirements of Revenue Sharing Handicapped Discrimination Regulations" (As was previously indicated, a copy of this report is available in the City Clerk's Office.). The evaluation is broken out by program and lists the following service-related accomplishments:

##### **Community Relations:**

The City regularly provides written and media program notice that it does not discriminate against qualified persons with disabilities to its service recipients, beneficiaries, and contractors. Within the Library programs, children's programs have staff persons for signing and a policy exists to provide special accommodations for communications if requested.

### **Service Selection**

The City does not make any inquiry regarding a person's disability in any health questionnaires or background investigation reports unless the inquiry is specifically designed to meet the service provisions needs of the person with a disability. When requested, interpreters are provided for the interviewing of interns and/or volunteers.

### **Service Provision**

The City does not have any specifications or standards that would arbitrarily exclude persons with disabilities. The departments do not give a reduced scope of service or benefits because of a disability or impose a charge for accomodation. Specifically within the Community Center, Fire Department, and Parks & Community Services programs, services are provided in an socially integrative setting so that all participants can participate with family and friends. Policies and practices concerning department sponsored activities for potential and actual clients do not prohibit participation by recipients with disabilities.

Within the Library programs, volunteer readers for the blind and books on cassette tapes are available, in addition to homebound programs and a disabled book return service. The Library has a monthly newsletter which provides some program information; however its information number is unavailable to the hearing impaired. Within each library, staff is well aware of accessible activities and services.

### **Health and Safety**

For the most part, Fire and Police training has been provided for the safe emergency protection and/or evacuation of disabled persons utilizing many services.

### **3. Current Deficiencies/Proposed Corrective Measures**

The service self-evaluation report identified program deficiencies in the following broad categories:

- o Lack of a city-wide statement of non-discrimination which is included in all municipal publications.
- o Lack of a city-wide public information effort in other than written form (Written material is typically not available in large print formats.).

- o Lack of city-wide accessible site information and a policy to use the same.
- o Lack of city-wide sensitivity training on the needs of the visually or physically disabled particularly for employees with direct public contact.
- o Lack of standardized grievance forms for those who have a accomodation and/or service program concerns.
- o Lack of shared TDD, braille, and/or signing staff capabilities in connection with all City sponsored activities.

In response to the service accessibility concerns, the Task Force has identified that the following general steps should be taken to address service-related deficiencies identified in the self-evaluation reports:

- a. The Public Information Officer should send out an annual reminder to all departments alerting them to the necessity of including a handicapped non-discrimination statement in each of their municipal publications. The Public Information Officer has indicated that she will be exploring the possibility of publishing the upcoming citizen services brochere in a large print format. On an annual basis, public service announcements should be sent to the media Stating the City's non-discrimination policy and listing numbers that people should contact if they have a problems or questions about the availability of City services, programs, etc.
- b. The Task Force would recommend that the Facility Management Division work with the City Manager's Office to get a city-wide listing of accessible service sites included in the upcoming citizen services brochere.
- c. The City Manager's Office should be directed to continue to explore how TDD, braille, visually enhanced and/or signing staff capabilities can be shared in connection with all City sponsored activities.
- d. Parks and Community Service Department staff should conduct routine training exercises to ensure that all aquatics personnel is familiar with the proper assembly and operation of the pool-lift equipment. To the extent that any pool's lift-equipment is not complete, the additional parts should be purchased. However, the costs associated with this project could not be unidentified at this time.
- e. Visual alarms and evacuation chairs should be purchased for the eight senior citizen centers, the McKinley Park complex, the 13 and "I" Building, Central Library, and City Hall.

## B. Structural Programs

### 1. Specific Legal Requirements

Since the major cost components for the City of Sacramento involve structural improvements, the legal requirements of Section 504 as they apply to architectural changes deserve a more thorough analysis. In no case do the implementing regulations require that recipient agencies provide a completely barrier-free environment. Physical barriers may exist in a recipient's facilities so long as these barriers do not hinder the full participation of handicapped persons in each program or activity when it is viewed in its entirety. To the extent that physical barriers do not hinder the full participation of handicapped persons in each program and activity, these barriers may remain in **existing** facilities. All new facilities (those constructed or renovated after finalization of individual agency regulations), must be architecturally accessible. From this it is evident that the Section 504 program regulations were carefully written to require "program accessibility" not "building accessibility", thus allowing the City some flexibility in selecting the means of compliance.

However in those cases where services are only available in non-handicapped accessible sites, the Section 504 regulations do state that "no qualified handicapped person shall, because a recipient's facilities are inaccessible to or unusable by handicapped persons, be denied the benefits of, be excluded from participation in, or otherwise be subjected to discrimination under and program or activity...". In this case, facility renovation and construction are required means of achieving program accessibility when other alternatives (for example the rescheduling of activities) are not successful in ensuring handicapped persons full access to programs. In addition to these legal stipulations, there may be other regulations which would mandate facility access for handicapped persons (e.g. Section 503 regulations for federal subcontractors or federally assisted construction mandated under the Architectural Barriers Act).

Architectural improvements are required "to the maximum extent feasible". This phrase is not defined in the government-wide rules, however, HHS did provide some general guidance. The "maximum extent feasible" is described as "covering cases in which the nature of the facility is such as to make it impractical or prohibitively expensive to renovate in a manner that results in a completely accessible alteration. In such cases, the maximum physical accessibility feasible should be the objective...". If a situation presents itself where the City might wish to provide an alternative route for the use of the handicapped, every effort possible should be made to incorporate these alternative routes into the regular pedestrian passages. These requirements apply to leased space, special events, as well as the use of "outside" facilities for the provision of recipient programs.

Section 504 regulations indicate that when structural changes are necessary to make programs or activities in existing facilities accessible, these changes have to be made "in no event, later than three years after the effective date of the individual agency regulations". In those situations where it is not possible to meet this timeframe, "recipients should document their efforts to achieve compliance, maintain written schedules and plans of action for achieving compliance, and continue working in good faith to meet their agencies' requirements".

At a minimum, the architectural transition plan should include the following elements:

- o Identification of physical obstacles in the City's facilities that limit the accessibility of its programs or activities to handicapped persons.
- o A detailed description of the methods that will be used to make these facilities accessible.
- o A specific schedule for taking the steps necessary to make facilities accessible.
- o A designation as to the person who will be responsible for the implementation of the plan.

In addition, the transition plan must also address facility improvements which aid in:

- o Determining the size, shape and locations of spaces within or adjacent to a building, such as stairs or parking.
- o Controlling the size, shape and location of objects such as door handles, restrooms, toilets, water fountains, control knobs, etc.
- o Limiting both the personal energy output by a handicapped person (for example, the angle of ramps) and the degree of exposure to hazard (such as modifying door hardware design to alert blind people whenever doors lead to hazardous spaces).
- o Specifying the size and nature of signs and signals to guide handicapped persons entering or using a building.

## 2. Accomplishments

While the City has a number of structural improvements which need to be made, the following are some of the building enhancements which have been installed to date:

## **New Facilities**

New buildings constructed by or for the City which comply with new handicapped standards include the Sacramento History Center and the 13th and "I" Office Building/Fire Station. Facilities under design which will conform to these new standards include Fire Station 11, the Oak Park-Fruitridge Library, renovations to the Crocker Museum, and the planned expansion of the Sacramento Boat Harbor.

## **Existing Structures**

Two recently completed Facility Management projects which included accessibility deficiency corrections identified through the self-evaluation process were the Belle Coolege Community Center and the restrooms in the basement of the Hall of Justice.

### **3. Current Deficiencies/Proposed Corrective Measures**

The initial steps of the structural self-evaluation involved an analysis of which buildings were routinely used by the general public and which therefore would fall under the compliance requirements of Section 504. Only a small portion of city facilities are not normally used by the public including such structures as the Prom and Richardson buildings, the Data Processing offices, the Corporation Yard (including the Eleanor, 28th Street and Public Safety Garages with the exception of the Support Services Division), the Communications Center, Park Maintenance and Chemical Storage Facilities, all of the Water Production and Distribution Division plants, tanks, and offices, along with all of the various Fire Stations. In addition, it was noted that a number of existing facilities will be rebuilt (Central Library, Memorial Auditorium) or services relocated (Community Services, Museum and History), eliminating the need for extensive structural modifications in these buildings. The final consultant structural recommendations are included in the report entitled "Disabled Access Survey of City Facilities used by the Public" submitted by Scott Harger. A copy of this report is on file in the City Clerk's Office.

#### **a. Facility/Structural Transition Plan**

In response to the problems identified in the three self-evaluation reports, Hi-Rise Interiors was hired to develop a specific structural transition plan which would address needed building improvements needed to increase access to service or programs. The resulting attached report entitled, "Architectural Modifications for Accessibility" ranks all municipal facilities by the limits on accessibility and the frequency of use. A phasing program was developed which placed the highest ranked projects, as determined by the combined rank of "current accessibility" and "current need" into a Phase I timetable. The Phase I timetable includes all projects which were given a combined need rank of 17 or above (the maximum need score possible was 20) and included both a structural analysis (what enhancements would a handicapped individual require simply to use the

building itself) as well as a accessibility review (how easy would it be for a handicapped individual to get to a particular building). Facility Management staff have indicated that it would be possible to complete all of the Phase I improvements within a sixteen month timeframe. Phase II and III deficiencies would be corrected immediately following and, depending upon the level of resources which could be devoted to this program, would be completed over the next six years.

b. Parking Transition Plan

The required parking lot enhancements could be completed within the same sixteen month timeframe as the various Phase I facility improvements. However, while Section 2-7102 of the State Building Code establishes the number of handicapped parking spaces required in parking lots, the City would draw exception to abiding strictly by the language of the law in this case. For the most part, the size of facilities operated by the Parking Division would require between 2 and 15 handicapped spaces for each lot, with the average running from between 5 and 9. It has been a practice of the Division to actually monitor the number of handicapped spaces which would be required, resulting in an allocation of only 3 to 4 reserved handicapped spaces are in most lots. Since state law provides that unlimited free street parking should be made available for the handicapped, there has been a resulting lack of demand for paid space in the City's parking structures. The City's practice therefore limits the number of reserved, unused handicapped spaces and makes these available for other patrons. Staff would recommend that this particular practice be permitted continue and that the City's policy should be to always provide sufficient handicapped spaces to meet user demand. In addition, the Parking Division will begin to provide handicapped preference in the issuance of monthly parking permits on the same basis as carpools.

C. Employment Programs

1. Specific Legal Requirements

While the Section 504 regulations mandate equal opportunity and nondiscrimination in employment, they are not part of an affirmative action statute, and consequently do not involve any specific goals or timetables related to the number of handicapped persons in the recipient agency's workforce. Although the implementing regulations may require some additional efforts in the area of recruitment so as to make certain that equal opportunities exist, it does not appear to be necessary for the City of Sacramento to employ more (or to attempt to employ more) handicapped persons (This does not however negate the requirements of Section 503 of the 1973 Rehabilitation Act, which is an affirmative action statute and does mandate increased employment where appropriate.).

Compliance with the Section 504 employment criteria does require that the City of Sacramento not only ensure an absence of discrimination against qualified handicapped persons, but also make adjustments and accommodations in individual instances to make certain that equal opportunities exist for qualified handicapped applicants and employees. Whenever a written notice of nondiscrimination is published, a prohibition against discrimination based upon handicap status should be included. The specific 504 standards which must be included in the City's transition plan include:

- o A method for notifying employees and applicants of their rights under Section 504.
- o The conduct of a self-evaluation process of all programs and activities (including employment) with the assistance of handicapped persons and/or their representatives.
- o Consultations with handicapped persons and/or their representatives in achieving compliance with Section 504.

As was previously indicated, Section 504 provisions only cover those persons who are defined as "handicapped" in the implementing regulations (see page 5 of this report). The employment prohibitions of Section 504 extend to outside organizations with which the City has formal relationships regarding employment (such as SHRA) and the City is prohibited against perpetuating discrimination "through significant assistance". Internal policies must follow standard nondiscrimination procedures, tests, and reviews to determine that equal opportunities for the handicapped are not mitigated. To the extent possible, recipient agencies must also review **practices** related to such policies or written statements to ensure that discrimination prohibited by policy does not exist in practice. Accomodations will be required in cases where it is clear that current recruitment and application processes do not provide handicapped persons with equal opportunities to obtain employment unless "undue hardship" would result.

The City's Affirmative Action Officer completed the employment analysis which is entitled "Self-Evaluation of the City of Sacramento's Employment Practices in Accordance with the U.S. Department of the Treasury Regulations Governing Nondiscrimination by Recipients of Federal Revenue Sharing Funds". A copy of this document is on file in the City Clerk's Office.

## **2. Accomplishments**

### **Community Relations**

The City of Sacramento has had a strong Affirmative Action Plan in place before the revised Revenue Sharing requirements were instituted. In March 1983, the City formally adopted an equal employment opportunity program for the handicapped. All employment related programs are administered uniformly without regard to an individual's disabled status and a great deal of written and/or other media effort goes into increasing awareness of municipal employment-related services in the handicapped community.

### **Service Selection**

The City's policy is to provide services and benefits without regard to an individual's handicap. On occasion, recruitment, advertising, hiring, and training are specifically geared towards improving employment opportunities for disabled individuals. Labor agreements provide for layoff, transfer, pay and benefits, and grievance procedures without differentiations or limitations imposed because of disabled status. In addition, the "right of return" from layoff and rehire decisions are made without regard to an individual's handicapped status.

### **Service Provision**

The City provides qualified handicapped individuals with appropriate employment-related aids and other benefits, including such assistance as alternative testing sites, readers and/or sign interpreters, and lifts and other special devices. Employment opportunities are available to all regardless of disabled status. City applications ask candidates whether they will need any special testing arrangements and state that information concerning a disability may be used for affirmative action purposes. Information collected as part of a replacement medical evaluation process is treated as confidential and only general information concerning an individual's functional limitations may be given to supervisors and appointing authorities for purposes of determining whether reasonable accommodations can be made.

### **Health and Safety**

The City has conducted a physical requirements survey of each of its salary classifications. The classification standards, selection

criteria and tests have been modified to conform with the results of the survey. In addition, reasonable accommodations are considered in instances where disabled applicants are deemed "unqualified" because their disability interferes with their ability to do the job safely.

3. Current Deficiencies/Proposed Corrective Measures

Some of the current employment-related deficiencies which were identified in the employment analysis include:

- o Lack of a regular process to advise the City Council of the nondiscrimination policy when making Board and Commission appointments.
- o Failure to mention handicapped access to training within the employment opportunity plan.
- o Lack of a formal internal process to advise current employees of the City's handicapped nondiscrimination policy.

The Task Force would recommend that the following actions take place in order to correct the deficiencies identified in the employment evaluation:

- a. The Personnel Department's Training Officer will be responsible for coordinating city-wide employee sensitivity training on the needs of the visually and/or physically disabled. The Personnel Department should also develop a standardized grievance form for the use of those who have accommodation and/or service program concerns. Once these actions are complete, the department should incorporate training access availability information into the employment opportunity plan.
- b. The City Clerk should be asked to include a handicapped non-discriminatory advisory statement in her annual City Council notification of Board and Commission vacancies. She should also be asked to incorporate a similar policy statement into Board and Commission advertising and informational materials.

#### IV. Overall Fiscal Analysis

After reviewing all of the evaluative reports and using the consultant's transition plan to determine the level of structural improvements which would subsequently be required, the Task Force evaluated the implementing costs for the handicapped access program. These costs have been allocated by program area deficiency and are summarized below:

##### A. Services

Most of the service-related access improvements are relatively inexpensive and include:

1. Enhancing public service announcement/information accessibility. The Public Information Officer has indicated that the City plans to have a person read the City Council and special meeting agendas as a part of the daily cable governmental program. In addition, regular public service announcements will be made indicating community meetings, special hearings, bid notifications, and leisure service information. The cable network has indicated that these services can be provided at no cost to the City of Sacramento.
2. Using Large Print formats. The proposed citizen service brochere can be printed in a large print format for a cost of **\$500**.
3. Increasing service accessibility for the hearing impaired. TDD units can be placed in the Departments of Public Works (Water/Sewer and Solid Waste), Community Center, Personnel, Library, Police, and Fire for a total cost of **\$1,388**.
4. Training aquatics staff on the use of pool-lift equipment. A regular training program should be conducted for aquatics personnel on the assembly and use of the pool-lift equipment. In cases, where the lift mechanism is incomplete, the missing parts should be purchased. Staff was unable to estimate a cost for this aspect of the program.
5. Installing visual alarms. Visual alarms would be installed in all locations frequented by members of the deaf or hard-of-hearing communities (for example, the eight senior citizen centers and the McKinley Park complex) or in work locations where deaf or hard-of-hearing employees work for a total cost of **\$900**.
6. Purchasing Evacuation Chairs. Evacuation chairs (or evac-chairs) should be purchased for all facilities used by the public, in which emergency evacuation would be hampered due to individuals' physical handicaps. Examples of such service facilities include the City's eight senior centers, the McKinley Park complex, the 13th and "I" Building, City hall, and the Central Library. The evac-chairs could be purchased for an estimated total cost of **\$3,600**.

**Total Service Related Costs: \$6,388**

B. Employment

Employment-related access enhancements include:

1. Purchasing employee sensitivity training materials. The "Windmills" program, which is used by the State of California in its handicapped access sensitivity training, can be purchased by the City for \$475.

**Total Employment Related Costs: \$ 475.**

C. Structural

Accessibility structural improvements will require the bulk of any program expenditures both for materials and staffing. The estimated total costs related to Facility Management and Engineering design expenditures in connection with **Phase 1 projects only** are summarized as follows (Detailed costs by project are included in attachment "A"):

**TABLE 1 - STRUCTURAL RELATED IMPROVEMENTS**  
Estimated Phase 1 Costs by Fund

<u>Fund</u>	<u>Amount</u>
General Fund	\$ 718,000
Parking	118,500
Fairytale Town	93,000
Camp Sacramento	41,000
Community Center	140,000
	-----
TOTAL	\$1,110,500
	=====

**Total Phase 1 Structural Related Costs: \$1,110,500**

**Total 1985-86 and 1986-87 Accessibility Costs: \$1,117,363**

The Facility Management Division of the General Services Department will bear the prime responsibility for much of the required accessibility structural work. The Facility Management Superintendent will be utilizing 3.0 additional FTE resource pool personnel (one Senior Carpenter, one Carpenter, and one Building Maintenance Worker) to complete these improvements for a 1985-86 cost of \$122,827. The resolution implementing the City's handicapped transition program also amends the 1985-86 Approved Budget to include these new positions. In addition, the resolution authorizes the transfer of monies from the Parking Fund to cover improvement costs associated with Parking Lots E, B, and H.

V. **Implementation Process**

A. Implementation Program

1. Designation of a City 504 Coordinator

The Section 504 requirements for the designation of a coordinator state that "employers employing 15 or more persons must name at least one person to coordinate compliance" with Section 504 rules. The coordinator is to help ensure that the organization's self-evaluation and transition plan are effectively completed.

The Director of Finance was originally designated as the City's 504 Coordinator as a result of the Finance Department's involvement in the Revenue Sharing process. However, once the Transition Plan is adopted, most of the on-going coordination will consist of investigating discriminatory complaints where individuals may not be able to utilize particular services due to structural or informational inaccessibility. Due to this change in emphasis from fiscal responsibility to discrimination investigation, the Handicapped Task Force would recommend that the Director of Personnel be designated as the City of Sacramento's 504 Coordinator. This assignment is in line with the Personnel Department's responsibility to investigate all complaints of service and/or employment discrimination particularly as it pertains to handicapped individuals - it in no way abrogates the need for each of the departments to annual review their services and to identify ways to strengthen access to them. The Task Force would therefore recommend that the Director of Personnel be assisted in her monitoring efforts with support from the following program staff:

For the Service Area: Citizen Assistance Officer  
For the Structural Area: Director of General Services  
For the Employment Area: Director of Personnel

2. Adoption of a 504 Implementation Plan

Section 504 government-wide regulations state that each agency shall, after notice and opportunity for comment, issue regulations to implement Section 504 with respect to the programs and activities for which it provides assistance. The internal agency regulations are to be consistent with the federal government-wide regulations. Standards in the government-wide regulations stipulate that each agency's nondiscrimination policies shall define appropriate terms, consistent with the definitions and the standards for determining who are "handicapped persons" and prohibit discriminatory practices against qualified handicapped persons in employment and in provision of aid, benefits or services, consistent with the federal guidelines. City regulations must also include, where appropriate, specific implementation policies adapted for the particular programs and activities which receive federal financial assistance indirectly through the City (for example the City/County Human Rights Commission).

The attached implementing resolution fulfills these mandates in the following manner:

- a. It adopts the service, structural, and employment self-evaluation reports and couples these with the structural transition analysis as the City of Sacramento's Transition Plan.
- b. It establishes an Implementation Timeline as follows:
  - Service Deficiencies: Complete all enhancements by August 15, 1986.
  - Structural Deficiencies: Complete all Phase I improvements by December 1, 1986. Phase II and III enhancements will be reviewed and implementation begun as of this date.
  - Employment Deficiencies: Correct all deficiencies by August 15, 1986.
- c. It amends the 1985-86 Capital Improvement program by adding \$118,500 in Parking Funds to project 101-1110-4363-4820 for required improvements to various parking lots. It also amends the 1985-86 Facility Management Division budget by 3.0 FTE's and \$122,827 to accomplish work on all of the various structural improvements.
- d. It formally designates the Director of Personnel as the Handicapped Compliance 504 Coordinator with additional staff support being provided for each of the program areas as follows:
  - Service Programs: Citizen Assistance Officer
  - Structural Programs: Director of General Services
  - Employment Programs: Director of Personnel

B. Adoption of Annual Policy Compliance Revision Procedures

The Task Force has recommended that there be an annual review procedure which would allow the City to adequately track its progress in correcting the previously identified accessibility deficiencies. In order to streamline this process, it would be appropriate to couple the handicapped access review with the City's annual affirmative action update. Since the bulk of the issues connected with one year's review would focus on accessibility complaints and, under the 504 requirements would be considered to be discriminatory and thus subject to investigation by the Affirmative Action Officer, the Task Force believes that there would be a more effective use of both staff and legislative time if these two functions were combined. The annual affirmative action review is conducted during February and March and any capital recommendations which arose from the combined affirmative action/handicapped access process could be

incorporated in a timely fashion into the capital improvement program. The Director of Personnel, acting as the City's 504 Coordinator, could develop formal procedures which would indicate what steps would be followed as a part of the input process.

B:Handicap  
7/26/85

COST ESTIMATES FOR HANDICAPPED ACCESS STRUCTURAL IMPROVEMENTS

Structure	Priority Weight	Facility Management Costs	Engineering Costs	TOTAL
Sr Citizen Center	19	\$17,500	\$67,000	\$84,500
Wm Land Pony Ride area	19	7,000	21,000	28,000
Wm Land Zoo	19	21,000	15,000	36,000
Wm Land Fairytale Town	19	56,000	37,000	93,000
Camp Sacramento	19	21,000	20,000	41,000
City Hall	18	70,000	59,000	129,000
Central Library	18	28,000		28,000
Memorial Auditorium	18	84,000	56,000	140,000
Clunie Community Center	18	28,000		28,000
McKinley Park	18	3,500	88,000	91,500
Miller Park	18	10,500	2,000	12,500
Wm Land Village	18	7,000	5,000	12,000
Parking Lot "E"	17	14,000	22,000	36,000
Coloma Community Center	17	35,000	4,000	39,000
Parking Lot "B"	17	3,500	51,000	54,500
Parking Lot "H"	17	14,000	14,000	28,000
McKinley Park Garden/Art Ctr	17	7,000		7,000
Wm Land Amphitheater	17	7,000	12,000	19,000
Wm Land Tiny Tot Building	17	7,000	2,000	9,000
Sac Horsemen's Assoc Clubhouse	17	7,000	35,000	42,000
McKinley Park Pool	17	14,000		14,000
Tahoe Park Pool	17	7,000	113,000	120,000
Wm Land Duck Lake Restrooms	17	7,000	1,000	8,000
Wm Land 12th Avenue entrance	17	10,500		10,500
TOTAL		\$486,500	\$624,000	\$1,110,500

BREAKOUT BY FUND

General	294,000	424,000	718,000
Parking	31,500	87,000	118,500
Fairytale Town	56,000	37,000	93,000
Camp Sacramento	21,000	20,000	41,000
Community Center	84,000	56,000	140,000
TOTAL	\$486,500	\$624,000	\$1,110,500

The following is a list of organizations that provide services to persons with disabilities in the Sacramento area:

Society for the Blind  
2750 24th Street  
Sacramento, CA 95818  
Contact person: Thomas Ryan, Executive Director

Head Trauma Support Group  
Post Office Box 26315  
Sacramento, CA 95826  
Contact person: Nancy Haley, President

Multiple Sclerosis Society  
2277 Watt Avenue, Suite C  
Sacramento, CA 95825

Muscular Dystrophy Association  
3336 Mather Field Road  
Rancho Cordova, CA 95670

Norcal Center on Deafness  
2400 Glendale Lane, Suite F  
Sacramento, CA 95825

Resources for Independent Living  
1230 H Street  
Sacramento, CA 95814

Goodwill Industries  
6648 Franklin Boulevard  
Sacramento, CA 95823

Sacramento Rehabilitation Facility  
6950 21st Avenue  
Sacramento, CA 95820

Diakonia Housing Corporation  
515 P Street  
Sacramento, CA 95814

Easter Seals Society  
3205 Hurley Way  
Sacramento, CA 95825  
Contact person: Carol Rex

ParaTransit  
3000 T Street, Suite 101  
Sacramento, CA 95816  
Contact person: Bill Durant, Executive Director

United Cerebral Palsy Association  
3102 O Street  
Sacramento, CA 95816  
Contact person: Louis C. Kuehner

Sacramento County Handicapped Compliance Committee  
3701 Branch Center Road  
Sacramento, CA 95827  
Contact person: Martha Powers

California Association of the Physically Handicapped  
Post Office Box 255133  
Sacramento, CA 95825  
Contact person: Walter Johnson, President

Gold Country Committee for Employment of the Disabled  
Post Office Box 255484  
Sacramento, CA 95865  
Contact person: Wyn Cochran, President

Training Toward Self Reliance  
3617 Marconi Avenue  
Sacramento, CA 95821  
Contact person: Claudia Bolton

State Developmental Disabilities Council  
1507 21st Street, Suite 320  
Sacramento, CA 95816  
Contact person: Robert SiFuentes

Area Developmental Disabilities Board III  
2400 Glendale Lane, Suite A  
Sacramento, CA 95825  
Contact person: Gil Eastham

## CONSUMER ADVISORY COMMITTEE

<u>Name and Address</u>	<u>Affiliations</u>
Lois Diamond Nor Cal Center on Deafness 2400 Glendale Lane, #F Sacramento, CA 95825	National Association for the Deaf California Association for the Deaf Interpreter Association Sacramento Deaf Club
Martha Powers County of Sacramento Compliance Program 3701 Branch Center Road Sacramento, CA 95827	California Association of the Physically Handicapped Gold Country Committee for Employment of the Disabled
Scott Richmond Resources for Independent Living 1230 H Street Sacramento, CA 95814	Diakonia Housing for the Disabled Sacramento Society for the Blind
Bill Jensen Department of Transportation Planning and Full Mobility Assistance Branch 1120 N Street Sacramento, CA 95814	Disabled in State Service California Association of the Physically Handicapped Paratransit Board of Directors Sacramento County Advisory Committee on the Handicapped
Robert SiFuentes State Council on Developmental Disabilities 7357 Bay Oak Way Citrus Heights, CA 95602	Resources for Independent Living California Association of the Physically Handicapped Disabled in State Service
Pat McPartland Department of Rehabilitation Mobility and Communication Barriers Section 830 K Street Mall Sacramento, CA 95814	California Association of the Physically Handicapped Resources for Independent Living (Life Member) Sacramento County Advisory Committee on the Handicapped Diakonia Housing for the Disabled

CITY OF SACRAMENTO

ARCHITECTURAL  
MODIFICATIONS FOR  
ACCESSIBILITY



Scott F. Harger  
Hi-Rise Interiors  
425 S st. Sacto, Ca.  
448-6182

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BACKGROUND

## BACKGROUND

During the summer of 1984, the City of Sacramento, California contracted with Scott Harger of Hi-Rise Interiors for a survey of City facilities used by the public to determine accessibility problems for the disabled.<sup>1</sup> The results of this survey were compiled in a report entitled Disabled Access Survey of City Facilities Used by the Public. The report lists the deficiencies of the site and all the structural deficiencies, including the accessible pedestrian routes on to the site, the parking areas, all exterior amenities, access into the facility and all functional areas within the facility. Standards used to determine deficiencies are in accordance with the State Building Code, Title 24, parts 2, 3, and 5, Regulations for the Accommodation of the Disabled in Public Accommodations.

As a follow-up to the facility survey report, the City has again contracted with Scott Harger to develop an implementation plan to correct the structural deficiencies cited in the previous surveys. The following document includes the implementation plan with the following contents:

1. Criteria for Prioritization - An explanation of the criteria used to determine the prioritization of each facility for modification.
2. Analysis - Worksheets showing a summarized analysis for each facility to determine the priority weight. The worksheets include a summary of the status of the "current accessibility" and the "current need" for each facility. Corrective actions are listed under the "current accessibility". Reference is made to the CITY FACILITY ACCESS SURVEY for a listing of specific deficiencies.
3. Timetable - A phased timetable showing a schedule for the correction of each facility.

## CRITERIA FOR PRIORITIZATION

For each facility a priority weight has been assigned. The priority weight is a quantitative score determined from reviewing the CITY FACILITY ACCESS SURVEY and the service policies and practices evaluation.

Each site and structure has been ranked according to the urgency for which recommended alterations should be performed. Those receiving a priority weight score between 20 to 17 are considered high priority, whereas those below 13 are considered low priority.

<sup>1</sup> It is important to note that not all city facilities were surveyed. Only those city facilities that City Staff deemed "used by the public" were surveyed. This designation could cause some confusion in the future when city offices move from a surveyed office building to an unsurveyed location. An example is the Sacramento Metropolitan Arts Commission. Subsequent to the survey, the commission relocated its office to an unaccessible 2nd floor office space. Also, city parks that had no structures on the property were not included in the survey.

The priority weight score is calculated by assigning a "current accessibility score" and a "need for accessibility score" to each facility and adding the two scores. The current accessibility score is based on a scale of 1 to 10, "10" being the score assigned to an inaccessible facility which needs major modifications to become usable to persons with disabilities. A score of "1" would indicate a fully accessible facility that fully complies with current access standards (Title 24 and ANSI). The current need score is also based on a 1 to 10 scale with "10" indicating a high need for accessibility and a "1" indicating the lowest need. In summary the formula can be expressed as follows:

Current Accessibility	+	Current Need	=	Priority Weight
(1 to 10 scale with 1 equal to fully acces- sible and 10 equal to inaccessible)		(1 to 10 scale with 1 equal to a low need and 10 equal to a high need)		

#### Current Accessibility

To determine the "current accessibility score", the CITY FACILITY ACCESS SURVEY was consulted and the deficiency list for each site and structure was reviewed. The following elements were considered:

Parking - the availability of on-street and off-street handicapped parking spaces.

Exterior Path of Travel - the degree of access throughout the site. Emphasis was placed on the main pedestrian route (i.e., from the parking lot to the entry).

Entry - accessibility of the primary entrance, including entry ramp, stairways and doors.

Circulation - accessibility within the facility between and into all functional areas.

Toilet facilities - accessibility of water closets, urinals, lavatories or showers and the room or space in which they are housed.

Key facilities - accessibility of drinking fountains and telephones.

Unique facilities - accessibility of other elements unique to the particular facility (i.e. library stacks to a library or the stage to an auditorium).

A brief note has been recorded regarding each of the above elements and a current accessibility score between 1 and 10 has been assigned. If the current structures limit accessibility and major modifications are necessary to correct the deficiencies, a score of "7" or above has been recorded. If only minor modifications are necessary, the score is in the lower portion of the range.

### Current Needs

The "need for accessibility score" considered three elements as follows:

Public use - The volume of public usage was considered. For recreational and park facilities, the use categories adopted by the City Department of Parks and Community Services was used. For example, city parks were categorized as neighborhood parks if they serve the area within one half mile radius of the park; community parks if they service an area within a three mile radius; and regional parks which serve and have facilities to meet the needs of the entire city population.

Nature of use - A categorical listing of the type of uses for each facility has been noted and considered to determine the need.

Availability of alternate sites - Alternative sites, when available at a reasonable distance and with equivalent facilities have been listed.

Using these three elements, a need score between 1 to 10 has been assigned to each facility. A facility having a very high need for accessibility is given a score in the range of 8 to 10.

### Priority Weight

Combining the accessibility score and the need score provides a priority weight for each facility. For example, a structure which ranks a "9" for current accessibility and a "10" for need of accessibility would receive a priority weight of "19". This facility has a high priority score indicating that the need to correct access problems is extremely important.

### CORRECTIVE ACTIONS

Corrective actions have been summarized in the "current accessibility" columns of the priority analysis worksheets. These are the structural modifications necessary for accessibility. In some instances the notation "Major Modifications" or "modifications needed" will be found on the worksheet. In these cases the user should refer to the Disabled Access Survey of City Facilities, July 1984, for a complete listing of deficiencies pertinent to the area cited. This was done in instances where the deficiencies are too numerous to summarize.

For the more involved facilities, a narrative description of the corrective action is provided following the analysis.

### IMPLEMENTATION PLAN

Based on the prioritization criteria and input from the Consumer Advisory Committee, the following implementation plan is recommended:

Those facilities receiving a priority weight score between 20 to 17 are recommended for immediate retrofitting and are designated as Phase 1.

Within Phase 1, if two or more facilities have identical scores, those with the highest "need score" should be retrofitted first. By referring to the Disabled Access Survey of City Facilities Report a prioritization of each correction required within each facility is listed. All the immediate (I), high (H), and medium (M) deficiencies noted in the report should be corrected when retrofitting takes place. Depending on budget constraints and the extent of deviation of the deficiency, low priority (L) items may be considered optional items for retrofitting. For example, if the height of a urinal deviates by one inch, the item has been considered a low priority item and is probably usable in its current condition.

It is recommended that Phase II include all those facilities with a priority weight score between 16 and 14 and Phase III include structures with a score 13 and below.

REMARKS

As a result of the prioritization analysis, it becomes apparent that the CITY HALL, CENTRAL LIBRARY, and MEMORIAL AUDITORIUM are high on the list for structural modifications. The consultants recommendations are as follows:

#### CITY HALL

There are two approaches to the access problem. The first involves accepting the reality of "Back Door Access" for persons with disabilities. This is the existing situation, which, with additional directional signing and minor modifications to parking and the elevator could construe accessibility. Although this approach is the most economical and perhaps the most expedient course of action, it is not recommended. The "effect" of "Back Door Access" is discrimination.

The second approach would create equal access and symbolically state that Sacramento City Government is accessible to all that it governs. This would be to provide a ramped front entrance. The architectural significance of such an endeavor can not be slighted, nor should it overrule access. If this approach is not taken at the present time when federal pressure is monetarily on the side of the disabled population; when will CITY HALL be truly accessible?

#### CENTRAL LIBRARY

Central Library, with the exception of the front ramp, is currently inaccessible to persons with disabilities. The consultant wishes to address the current situation which will be alleviated when the new library is constructed. As there is no City commitment to commence construction at the time of this writing, it is necessary to provide access. It is understood that the library system, by virtue of its many locations and bookmobile is providing accessibility. Central Library is unique by virtue of its location and its collections. For the office workers of the downtown area it is a valuable resource for reference. Due to the high number of physically challenged persons employed in this area, and the high number of elderly residents, accessible measures must be taken. The recommendations include modifying one of the first floor toilet rooms into an accessible unisex facility. It is current library practice to keep these facilities locked, which the consultant recognizes and points out the need for upgrading the locksets to prevent a person from becoming locked in. It is understood that in the interim total accessibility is not the goal, just usability within economic limits. The elevator poses a unique dilemma. At present one must ask for assistance from the desk area, which for many types of disabilities is justified. However for the "able-disabled" waiting for an elevator operator is frustrating and time consuming. It is recommended that various controls be studied and a call button specifically for elevator assistance be installed. There needs to be a reference list showing which stacks are inaccessible, thus requiring staff assistance, and which stacks are useable by narrow wheelchairs. There is also a need for a wheelchair accessible drinking fountain.

As the library system implements security devices at the checkout counter, the disabled must not be forgotten. Any security control device must not hinder wheelchairs or become a hazard during emergency evacuation. The library should recognize that all machinery, such as copy machines and fiche viewers, should be at useable heights for use by persons with disabilities.

A major attraction of a library is the ability to browse among the various collections. The consultant recognizes that during this interim period, browsing in wheelchairs will be restricted in the stacks, and difficult in the reading areas. The aisle width that is existing is barely adequate and must not be reduced to accommodate more collections.

#### MEMORIAL AUDITORIUM

This historic auditorium is in a situation similar to the CENTRAL LIBRARY. The City has plans to renovate the building but has not committed to funding the project or to a construction schedule. Therefore the consultant proposes minor modifications on the interior, creating access for the interim period, and recommendations for permanent measures on the exterior.

The exterior site amenities, such as the monumental steps and the walkways are in a rather poor condition. If the building is to be renovated, these will be rebuilt. The consultant recommends that the access issue be addressed within the time frame of this study. If the front entrance is ramped to architecturally fit the building, a permanent access will be provided and no further modifications will be necessary; whether the building renovation takes place or not.

For the interior modifications refer to the COMMENTS section in the "DISABLED ACCESS SURVEY OF CITY FACILITIES USED BY THE PUBLIC".

#### CITY PARKS

The structural deficiencies for city parks were quite consistent. Most parks with on-street parking had no handicapped parking spaces. Blue curbs and proper signing adjacent to the accessible entrance of the park will correct this deficiency.

Regarding the pedestrian paths of travel into the parks, emphasis should be on pedestrian access into the park for use by persons residing or parking within walking distance of the facilities. A secondary emphasis should be from the signed parking area into the park area. The most inaccessible conditions along the major pedestrian routes should be altered first. Alternative points of access and painted pedestrian crossings should be provided so a person with a disability is not restricted to one point of access. In instances where a low rolled curb is the existing condition, it is not necessary to provide a curb ramp at this time.

Most drinking fountains within the parks did not provide a 27" h X 18" d clear space underneath for wheelchair users or a control that did not require the ability to grasp. As drinking fountains are replaced or a score 13 and below.

added in the parks these corrections should be made.

Restrooms were highly vandalized throughout the city. As fixtures and stalls are replaced a special effort should be made to allow clear space as required by the State Architect Regulations for multi-accommodation restrooms.

## SWIMMING POOLS

Several of the city swimming pools could be made accessible to persons with disabilities through minor modifications. Besides the structural modifications to the pool facilities, the consultant also recommends the availability of pool lifts and trained personnel to handle persons with disabilities. Pools high on the priority list for these accommodations include McKinley Park Pool area, Tahoe Park Pool, Southside Park Pool and Hall Pool.

FACILITY PRIORITY LIST  
WITH  
PHASED TIMETABLE FOR  
ACCESSIBILITY MODIFICATIONS

FACILITY PRIORITY LIST

Phase I

	SCORE	SCORE	PRIORITY
Senior Citizens Center	9	10	19
William Land Park Pony ride area	9	10	19
William Land Park Zoo	9	10	19
William Land Park Fairytale Town	9	10	19
Camp Sacramento	9	10	19
City Hall	8	10	18
Central Library	10	8	18
Memorial Auditorium	10	8	18
Clunie Community Center	8	10	18
McKinley Park	9	9	18
Miller Park	9	9	18
William Land Park Village	9	9	18
Parking Lot E 916 13th St.	7	10	17
Coloma Community Center	7	10	17
Parking Lot B 814 11th St.	8	9	17
Parking Lot H 1116 11th St.	8	9	17
McKinley Park Shephard Garden & Arts Cntr.	8	9	17
William Land Park Amphitheater	8	9	17
William Land Park Tiny Tot Building	8	9	17
Sacramento Horsemen's Assoc. Clubhouse	8	9	17
McKinley Park Pool area	9	8	17
Tahoe Park Pool	9	8	17
William Land Park Duck Lake restrooms	9	8	17
William Land Park 12th Ave.	9	8	17

UTILITY PRIORITY LIST

Phase II

	A S C C E S S	S C O R E	N E E D	S C O R E	P R I O R I T Y	W E I G H T
Parking Lot O Front & J St.	6		10		16	
Parking Lot P 2nd & I Sts.	6		10		16	
Crocker Art Museum	6		10		16	
Hall of Justice	7		9		16	
Parking Lot U 4th & J Sts.	8		8		16	
McKinley Park Pre-School	8		8		16	
Animal Control	8		8		16	
Mangan Pistol Range	8		8		16	
Community Services Building	9		7		16	
Southside Park Pool	10		6		16	
Parking Lot C 801 14th St.	6		9		15	
William Land Rock Garden & Pergola	6		9		15	
Sacramento Trap Shooting Club	8		8		15	
Sacramento Trap Shooting Club Clubhouse	7		8		15	
Curtis Park	8		7		15	
Woodlake Park Community Center	8		7		15	
Johnston Park Pool	8		7		15	
Mangan Pool	8		7		15	
Wood Park	8		7		15	
History Center	5		10		15	
Community Center Activity Building	4		10		14	
Hagginwood Park	7		9		14	
Building Inspection & Community Development	6		9		14	
Parking Lot G 1005 4th St.	6		8		14	
East Portal Park	7		7		14	
East Portal Park Card Room	7		7		14	
Garcia Bend Park	7		7		14	
Hagginwood Park Community Center	7		7		14	
Hall Park	7		7		14	
Hall Pool	7		7		14	
Woodbine Park	7		7		14	

	A S C O R E	N E E D S C O R E	P R I O R I T Y W E I G H T
Woodlake Park	7	7	14
Winn Park	7	7	14
Dos Rios School Park	8	6	14
Southside Park	8	6	14
Tahoe Park	8	6	14
Parking Lot R 1225 Neasham	9	5	14

	ASSESS SCORE	NEED SCORE	PRIORIT TY WEIGHT
Phase III Robertson Park	5	8	13
Robertson Park Community Center	5	8	13
Sim Park	5	8	13
Parking Lot J 29th & J Sts.	6	7	13
Reichmuth Park	6	7	13
Sacramento Horsemen's Assoc. Field Arena	6	7	13
Cabrillo Park Pool	6	7	13
Chorley Park	7	6	13
City Plaza Park	7	6	13
Johnston Park	7	6	13
Colonial Park	8	5	13
Coolidge Library	8	5	13
Gillis Library	8	5	13
Renfree Field	8	5	13
Parking Lot W 2nd & J Sts.	2	10	12
Parking Lot A 1216 7th St.	4	8	12
Oak Park Community Center Complex	4	8	12
County Services Center	4	8	12
Community Center Building	4	8	12
Sim Park Pool	4	8	12
Sim Park Community Center	4	8	12
Coloma School	5	7	12
Argonaut Community Center Teen Center	5	7	12
Hagginwood Park Library	5	7	12
McClatchy Park	5	7	12
Dixieanne Park	6	6	12
Richardson Village	6	6	12
Southside Park Bandstand	6	6	12
Haggin Oaks Golf Course	6	6	12
Single Men's Housing 2640 Front St.	6	6	12
Baer Park	7	5	12

## FACILITY PRIORITY LIST

Page 1

	ACCESS SCORE	NEED SCORE	PRIORITY WEIGHT
O'Neill Park	7	5	12
Hopkins Park	7	5	12
Bing Maloney Golf Course	7	5	12
King Library	7	5	12
Personnel Building	7	5	12
Parking Lot K 6th & L Sts.	3	8	11
Doyle Pool	3	8	11
Glenbrook Park	4	7	11
McKinley Park Library	5	6	11
Strawberry Manor Park	6	5	11
Del Paso Heights Park (Roanoke)	6	5	11
Fremont Park	6	5	11
Gardenland Park	6	5	11
Lawrence Park	6	5	11
Northgate Park	6	5	11
Oki Park	6	5	11
William Land Golf Course	6	5	11
McClatchy Library	6	5	11
McClatchy Park Pool	2	8	10
Oki Pool	2	8	10
Grant Park	5	5	10
Redwood Park	5	5	10
Roosevelt Park	5	5	10
Warren Park	5	5	10
Muir Park	6	4	10
Stanford Park	6	4	10
Belle Coolidge Community Center	1	9	10
Argonaut Elderly Nutrition Building	2	7	9
Henschel Park	4	5	9
North Sacramento Library	4	5	9
Oak Park Library	3	5	8

FACILITY PRIORITY LIST

	ACCESS SCORE	SCORE	PRIORITY WEIGHT
Waste Removal Office	6	2	8
City Cemetary	4	3	7
Library Administrative Office	5	2	7
Sacramento Horsemen's Assoc. Ann. Booth	2	2	4