

Americans with Disabilities Act Access Audit and Transition Plan

November 10, 2020



RESOLUTION NO. 5409

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CHANDLER, ARIZONA, ADOPTING AND APPROVING THE CITY OF CHANDLER'S 2020 UPDATE TO ITS ADA SELF-EVALUATION AND TRANSITION PLAN

WHEREAS, the Americans with Disabilities Act (ADA) was enacted by Congress in 1990, and implementing regulations were established by 1992; and

WHEREAS, thereafter, in accordance with said regulations, the City of Chandler (the "City") did conduct a self-evaluation of its policies, programs, services and existing facilities, after which the Chandler City Council did pass and adopt Resolution No. 2054, adopting and approving the initial Chandler ADA Transition Plan in 1992 as required by the ADA and its regulations; and

WHEREAS, Chandler City Council did pass and adopt Resolution Nos. 4918 and 5337, adopting and approving updates to the Chandler ADA Transition Plan in 2015 and 2016; and

WHEREAS, an updated transition plan based on a self-evaluation of all City parks, facilities and rights-of-way has been recommended by the Federal Highway Administration (FHWA) who has regulatory responsibility under ADA law to monitor the compliance of the self-evaluation and transition plans of Federal-aid recipients; and

WHEREAS, the City retained a professional consultant to complete a comprehensive update to the City's self-evaluation and ADA Transition Plan; and

WHEREAS, Transportation Policy division staff have completed recommended revisions entitled the City of Chandler, Arizona "Americans with Disabilities Act Access Audit and Transition Plan - November 2020" (the "Updated Plan");

NOW, THEREFORE, BE IT RESOLVED that the City Council of the City of Chandler, Arizona, as follows:

- Section 1. Accepts the Updated Plan as the City of Chandler's ADA transition plan going forward from this date.
- Section 2. Directs City staff to implement the Updated Plan.
- Section 3. Authorizes the City Manager, or designee, to make adjustments to the phases of the City's Parks and Facilities Retrofit Schedule as may be required by budgetary or other needs.

PASSED AND ADOPTED by the Council of the City of Chandler, Arizona, this 10 day of December, 2020.

ATTEST:

Dana R. DeKey
CITY CLERK

Kevin Hanthe
MAYOR

CERTIFICATION

I HEREBY CERTIFY that the foregoing Resolution No. 5409 was duly passed and adopted by the City Council of the City of Chandler, Arizona, at a regular meeting held on the 10 day of December, 2020 and that a quorum was present thereat.

Dana R. DeKey
CITY CLERK

APPROVED AS TO FORM:

[Signature]
CITY ATTORNEY *Bm*



AMERICANS WITH DISABILITIES ACT ACCESS AUDIT AND TRANSITION PLAN

FINAL REPORT TO THE CITY OF CHANDLER

SUMMARY AND RECOMMENDATIONS

NOVEMBER 10, 2020

City of Chandler Elected Officials

Mayor Kevin Hartke

Vice-Mayor René Lopez

Councilmember Terry Roe

Councilmember Matt Orlando

Councilmember Mark Stewart

Councilmember Jeremy McClymonds

Councilmember Sam Huang

City of Chandler Project Managers

Jason Crampton, AICP, LEED AP
Transportation Planning Supervisor

Dan Haskins, P. E.
Project Manager

City of Chandler ADA Compliance Team

Mickey Ohland
Community Services Planning Manager

Rex Hartmann
Parks Maintenance Program Administrator

Warren White, P. E.
Principal Engineer

Allan Zimmerman
Streets Project Manager

Mike Hollingsworth
Facilities and Fleet Manager

Jeff Larsen
Parks Operations & Maintenance Manager

Don Tolle
Park Planning Superintendent

Jaya Velagapudi
GIS Manager

Collette Prather
Recreation Coordinator II

Kevin Lair
Transportation Manager

Rowena Laxa
Assistant City Attorney

WT Group Accessibility Practice Project Team

John McGovern, Principal-in-Charge
Tanya Scheibe, Project Manager
Dick Yano, P. E., Wood, Inc.

Shelley Zuniga, Principal
Dana Esposito, Senior Accessibility Specialist
Teresa Makinen, MakPro

TABLE OF CONTENTS

01	Introduction	5
1.1	Americans with Disabilities Act (ADA) General Mandates.....	5
1.2	The ADA Administrative Requirements	5
1.3	The ADA Requirements for New Design and Construction	6
1.4	The ADA Requirements for Existing Facilities.....	8
1.5	The ADA Transition Plan Requirement	9
1.6	The ADA Requirements for City of Chandler Communications	11
1.7	The ADA Limitations: Technical Infeasibility and Undue Burden	11
02	The City of Chandler’s Approach to ADA Compliance	13
2.1	The 1992 Self-Evaluation.....	13
2.2	The 2016 Partial Transition Plan	13
2.3	The 2020 Scope of Work and Transition Plan	14
2.4	Community Engagement.....	17
2.5	Mayor’s Committee on People with Disabilities	17
03	Access Audit Findings and Recommendations	18
3.1	Methodology for Parks and Facilities Audits	18
3.2	Priorities for Park and Facilities Retrofits	18
3.3	Detailed Site Reports.....	20
3.4	Parks Findings	20
3.5	Facilities Findings.....	34
3.6	Methodology for Public Right-of-Way Audits	37
3.7	Priorities for Public Right-of-Way Retrofits	38
3.8	Public Right-of-Way Findings	39
04	2020 Transition Plan.....	40
4.1	Community Engagement Influences	40
4.2	City of Chandler Staff Feedback	40
4.3	The Program Access Test for Existing Facilities.....	40
4.4	Efficiency: Blending Retrofits with CIP Activity	40
4.5	Responsible City Official.....	41
4.6	Blending the 2016 and 2020 Work	41
4.7	Parks and Facilities GIS Shapefile.....	41
4.8	Parks and Facilities Retrofit Schedule	42
4.9	Parks and Facilities Costs and Costing Methodology	42
4.10	Public Right-of-Way Retrofit Schedule.....	43
4.11	Public Right-of-Way Costs and Costing Methodology.....	43
05	Access and Inclusion Solutions Process	44
06	Program and Policy Report	45

07	Funding Access Retrofits	46
08	Implementation Strategies	49
09	Conclusion.....	51
10	Appendices	
	Appendix A: Public Right-of-Way (ROW) Transition Plan Report	
	Appendix B: Public Feedback Report	
	Appendix C: Program and Policy Report	
	Appendix D: Access and Inclusion Solutions Process	
	Appendix E: Model Service Animal Policy	
	Appendix F: Parks and Facilities Transition Plan Summary	



INTRODUCTION

The purpose of this portion of the report is to review and apply the requirements of the Americans with Disabilities Act that apply to City of Chandler facilities, right-of-way assets, programs, policies, and services.

1.1 Americans with Disabilities Act (ADA) General Mandates

The [Americans with Disabilities Act](#) (ADA) is a comprehensive federal civil rights law that prohibits discrimination on the basis of disability. It became effective on January 26, 1992, and has been amended by Congress only once, by a statute adopted in 2008. The ADA has three principal chapters or titles. Title II applies to the City of Chandler and the approximately 89,000 other units of state and local government across the country, and it requires the city to make parks, facilities, policies, communications, and programs, accessible to and usable by people with disabilities. Other portions of the ADA prohibit discrimination by employers, businesses, and nonprofits.

The subject of this report is City of Chandler parks, facilities, and right-of-way (ROW) assets. As with any statute, there is some overlap. A space used principally by city employees that might be visited by a member of the public is not solely an employee space, and must have a level of accessibility for that visitor if he or she has a disability. The city has relationships with many nonprofits, and when a nonprofit uses or benefits from the use of city property or resources, the nonprofit is strictly prohibited from discrimination on the basis of disability.

The ADA is to be broadly interpreted. In this section of the final report, we will define terms as they are defined by the ADA. In the remainder of this section, we will review the ADA administrative requirements for the city, review the ways in which the ADA applies to new design and construction, review the ADA requirements for existing facilities, review the ADA Transition Plan requirement, review ADA requirements for city public facing policies, review the ADA requirements for City of Chandler programs, and review the ADA requirements for City of Chandler communications. Finally, this section concludes with a review of the limitations on the accessibility requirements, including technical infeasibility and the concepts of undue burden.

1.2 The ADA Administrative Requirements

The US Department of Justice (DOJ) published the title II implementing regulation in 1991, and it became effective on January 26, 1992. It has been amended once, and those changes became effective March 15, 2011. The DOJ title II regulation is [here](#).

The City of Chandler faces many administrative requirements under title II of the ADA. In this section of the report, we will describe and review five key administrative requirements.

35.106 Notice Requirement: The City must make its citizens aware of the "...protections against discrimination assured them..." by the ADA. In doing so, the city must provide information about how parks, facilities, programs, policies, and communications are affected by the ADA. We recommend the city do so in a way that is

inviting and appealing, and consistent with the way in which the City communicates with members of other protected classes. The City meets this requirement.

35.107(a) Designation of Responsible Employee: The City must appoint at least one employee "...to coordinate its efforts to comply with and carry out..." its obligations under the ADA. Known as the ADA Coordinator, this role is responsible for investigating complaints regarding noncompliance, as well as coordination of overall ADA implementation. The city does have an ADA Coordinator and has developed an ADA Team, with representatives from many City public facing departments. This is acknowledged as a superior model for compliance with this requirement.

35.107(b) Complaint Procedure: The City must have a process by which disputes regarding accessibility at sites, effective communications, and inclusion in programs and services can result in "...prompt and effective resolution...". DOJ refers to this as a "grievance procedure", and the City does have such a process. We do recommend that the City change the way it refers to this process. Naming it a complaint process or grievance process gives it the appearance of an adversarial process. It need not be, and in fact, many believe that a more positive approach yields "prompt and effective resolution" in a much more customer-friendly way. We suggest the City consider renaming the process to Access and Inclusion Solutions Process, or some other appropriate name that is inviting, not adversarial.

35.130(b)(7) Make Reasonable Modifications: The City must make reasonable modifications that enable access to programs and facilities, when so requested by a person with a disability, unless doing so creates an undue burden (see section 1.9 of this report). The statute and the DOJ regulation identify many actions or devices that are a reasonable modification. In addition, court decisions and DOJ settlement agreements help further define the term and the limits on the concept of reasonable modification. The DOJ ADA website is a good source of information on this subject at www.ada.gov.

35.150(a)(3) Writing Requirement: The City, whenever it denies a request for a reasonable modification, must create a writing. This is a mandate once it is determined by City staff that a request would create an undue burden (again, see 1.9 of this report). Importantly, the writing is to be signed by "...the head of the entity or his or her designee...". In making this decision, the entity is to consider "...all resources available for use in the funding and operation of the service, program, or activity...". We recommend that the City Council delegate this authority to the City Manager, who can then delegate it to department heads or program managers with the authority to make such decisions. We also recommend that these writings produced by all departments be kept together for ease of access and analysis. These will have great risk management value and will help greatly in forecasting the types of requests the city will receive.

1.3 The ADA Requirements for New Design and Construction

Many of the ADA requirements are open to some interpretation regarding compliance. There is, however, one set of requirements that is clear: all City of Chandler new design and construction must comply with the federal [2010 Standards for Accessible Design](#) and any State of Arizona or Maricopa County requirements that are more stringent from an access perspective. The DOJ regulation at section 35.151 establishes this

requirement, and permits a variance only when it is “structurally impracticable” to fully comply with the Standards.

Experts estimate that design and construction for ADA compliance adds not more than 1% to the facility cost. For the City, it is critical that all designers and contractors understand this mandate and comply with this mandate. Plan review and effective project management by City staff assure that plans and ongoing construction are compliant. The investment of human resources towards this goal is much less costly than removing barriers after a park, facility, or ROW asset has been constructed.

New design and construction includes the design and construction of alterations and additions, therefore alterations and additions must strictly adhere to the 2010 Standards. The DOJ title II regulation, at 35.151(b)(4), establishes a requirement that when alterations or additions occur at an existing City of Chandler facility, that a “path of travel” is required to connect the accessible elements of the existing facility with accessible elements in the altered area or addition. In preparing the regulation, DOJ recognized the inequity of a result whereby the accessibility portion of an alteration or addition, the path of travel, could require more fiscal resources than the alteration or addition. The regulation therefore introduces the concept of disproportionality, which permits the City to limit path of travel costs to 20% of the cost of a project

Three clarifications are necessary regarding the concept of disproportionality.

First, the City may elect to apply the concept of disproportionality; it is not required to do so. If the City wishes to make the cap 30% of the cost of the alteration or addition, it may do so. The ADA sets the floor, not the ceiling.

Second, the path of travel must be applied when the alteration or addition is to a primary function area. A primary function area is “...a major activity for which the facility is intended.” Examples in the title II regulation include “...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 the facility are carried out.” We would add other examples, pertinent to City of Chandler facilities. These include:

- Swimming pools and changing rooms at City pools;
- Playground surfaces and playground components at City playgrounds;
- Spectator seating and player seating at City softball and baseball fields; and
- Study carrels and reading rooms or areas at City libraries.

Third, some work at an alteration or addition is simply maintenance and the cost of that work may be deducted from the determination of the cost of the alteration or addition, thereby affecting the amount necessary to meet the 20% disproportionality test. At most sites these non-alteration costs are very small. In a world where every City of Chandler penny counts, it is appropriate to properly apply the concept of disproportionality. Access requirements for new design and construction are important in the context of the City of Chandler Capital Improvement Plan (CIP). It is critical that CIP project designers and contractors meet or exceed federal and local requirements.

1.4 The ADA Requirements for Existing Facilities

The title II requirements for existing facilities begin with a requirement that the **programs** within those facilities and sites are what is to be made accessible. DOJ title II at 35.149 clearly states that "...no qualified individual with a disability shall, because a public entity's facilities are inaccessible to or unusable by individuals with disabilities, 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."

The term "program" is to be broadly interpreted. For the City of Chandler, a program is the opportunity made available to the public. A parking kiosk downtown is a program. Making public comment at a City Council meeting is a program. Playgrounds are a program. Having picnic tables in a park is a program. Staffing and conducting recreation activities during the summer or afterschool is a program. Making subsidized housing available is a program. Think broadly here, and understand that a program is not just an organized activity for which one registers and participates. In applying 35.149, it is a violation of the ADA if a City program cannot be accessed by a person with a disability because the facility in which the program is located is inaccessible.

Title II at 35.150 discusses the parameters for making existing facilities accessible. It requires the City to view that program "...in its entirety..." at 35.150(a). This is interpreted to mean that all of the locations of a program, e.g., every City of Chandler playground, must be viewed before determining which will be made accessible and which will be left as is until next altered or replaced. This latter statement is made clear at 35.150(a)(1), where the City is told by DOJ that these requirements do not "...necessarily require a public entity to make each of its existing facilities accessible to and usable by individuals with disabilities..."

Making a program accessible does not always require making a facility accessible. This is explained by DOJ at title II 35.150(b), where it reviews some of the methods to make a program accessible. The non-structural methods, include, but are not limited to:

- Relocating a program from an inaccessible site to a site that is accessible;
- Providing a program at two or more sites, one of which is not accessible and at least one of which is accessible;
- Redesign or acquisition of equipment to make program participation possible;
- Bringing the program to the person with a disability by making home visits;
- Construction of new accessible facilities to house the program;
- Providing extra staff to facilitate interaction by program beneficiaries; and
- Use of accessible rolling stock or other means of conveyance.

Elsewhere in title II, the City is required to make changes to rules and policies as well. These nonstructural alternatives may be effective in making a program accessible. However, when nonstructural alternatives are not effective in making the program

accessible, 35.150(b) requires the City to make alterations to existing parks, facilities, and assets, and when doing so, to treat the alteration as new work and comply with title II 35.151. The City must also give the highest priority "...to those methods that offer services, programs, and activities...in the most integrated setting appropriate. This mandate is discussed in Section 1.7 of this report. Additionally, the City must disperse the accessible programs that are to be retrofit. For example, all accessible playgrounds cannot be located in one quadrant of the City.

The 2011 title II regulation amendments introduced the concept of safe harbor for the City of Chandler and other states and local governments at 35.150(b)(2). In essence, if the City in designing and constructing an asset, prior to March 15, 2012, complied with the 1991 Standards for Accessible Design, it cannot be penalized if the Standards change at a later date. An example of safe harbor is the reach range requirement. In the 1991 Standards, reach range could be as high as 54" above the finished floor (aff) if a side approach was used and only 48" aff if a forward approach was used. In the 2010 Standards, because of confusion about forward reach and side reach, the maximum reach range was simply reduced to 48" aff. The safe harbor concept applies here, and at City of Chandler facilities designed and constructed before March 15, 2012, where a proper side reach can be used, an operating mechanism can be as high as 54" aff. However, if that hypothetical operating mechanism is at 55" aff, it failed to meet the 1991 Standards and must be retrofit to meet the 2010 Standards maximum of 48" aff.

It is important to note that many City assets were not addressed by the 1991 Standards, and were only addressed later in the 2010 Standards. That includes City playgrounds, swimming facilities, sports fields, sports courts, and exercise machines and equipment, to name a few. As such, the concept of safe harbor cannot apply to these assets, and the program access test reviewed earlier in this section applies. As an example, playgrounds, but not necessarily all, must be accessible. See 1.5 regarding the transition plan for more detail.

1.5 The ADA Transition Plan Requirement

The title II regulation, at 35.150(c) and 35.150(d), make clear the requirements of the Transition Plan. A transition plan is a phased order of retrofit for existing parks, facilities, and ROW assets. The City of Chandler, in pursuing compliance with this requirement, has wisely chosen to exceed the minimum requirements for the content of a Transition Plan. At 35.150(d), the requirements are:

- Describe the deficits at every City asset;
- Describe a solution for each deficit, or if it is to be left as is, describe why (see 1.9 of this report);
- Specify the year or by what date in which the retrofit will occur; and
- Name the City official responsible for assuring compliance.

No City of Chandler plan can be effective, however, without cost references or estimates. In developing the Transition Plan, the City has required cost references or cost estimates to enable effective planning for the retrofits that will occur.

A key issue for the City of Chandler is understanding guidance as to by what date all retrofits must be completed. The title II regulation, at 35.150(c), discussing the time period for compliance, offers this guidance:

“Where structural changes in facilities are undertaken to comply with the obligations established under this section, such changes shall be made within three years of January 26, 1992, but in any event as expeditiously as possible.”

To suggest that this is not helpful guidance to the City is an understatement, for several reasons. First, it would be literally impossible for the City to have, in 1992, made all of the necessary retrofits by January 26, 1995. In fact, it would be literally impossible for the City to make all retrofits that are necessary during any three-year period. Second, when the title II regulation was amended by DOJ and made effective March 15, 2011, this language was not updated with a new compliance date. Third, when the 2010 Standards were published and included for the first time certain types of recreation assets (see section 1.4 above), there was no change to the completion date of 1995.

The City can draw guidance from the statement above by acknowledging that retrofits will occur as soon as is possible. This requires a balancing of City resources, integration of Transition Plan retrofits with CIP activity, and making Transition Plan work a higher priority than discretionary development and acquisition.

DOJ does acknowledge that retrofits to ROW assets may require a different approach than the program access approach. In title II 35.150(d)(2), DOJ establishes the following priorities for ROW. First priority shall be ROW assets that serve State, County, City, and Public School District assets. Second priority shall be ROW assets that serve public transportation assets. Third priority shall be ROW assets that serve title III entities such as restaurants, taverns, hotels, retailers, banks, law offices, car dealerships, and other privately owned places of public accommodation. Fourth priority shall be ROW assets that serve places of employment. Fifth priority shall be ROW assets that serve nonprofits and faith based entities. The last priority is ROW assets that serve other areas, such as residential areas.

Regarding parks and facilities, there is other guidance by DOJ. If there is only one of a type of asset it must be made accessible. This would apply in Chandler to City Hall and other one-of-a-kind facilities that serve the public. If there are numerous assets of the same or similar type, such as pools, playgrounds, trails, and libraries, not necessarily all must be made accessible (see section 1.4 above). When this recurring asset issue arises, DOJ does not specify a percentage or ratio that must be accessible. Our work in preparing the transition plan recommendations relies on making a minimum of one of every three recurring assets accessible, and dispersing accessible assets throughout the City. This assures that no matter where a resident is, some City assets are near him or her and are accessible.

Lastly, title II at 35.150(d)(a) requires the City to provide an opportunity for the public to participate in the development of the transition plan. The City implemented a robust community engagement process, conducting two public feedback sessions on ROW assets, and two public feedback sessions on parks and facilities. This is discussed in more detail in sections 2.4 and 4.1.

1.6 The ADA Requirements for City of Chandler Communications

The title II regulation, at 35.160, requires that City of Chandler communications to the public with disabilities must be “as effective” as communications to those without disabilities. People with certain health conditions such as deafness or impaired vision may not be able to ascertain the message within the communication. People with a cognitive impairment may not understand the message. People with physical disabilities that limit their ability to use a mouse may not be able to get the cursor to the content on the website.

More and more local governments were using their websites for communication with the public as well as with employees. Certainly today, in a Covid-19 era, that reliance has only grown.

The broad requirements apply to the City website, letters, hard copies of contracts, aural communication that might occur at a City Council meeting, emails, phone calls, and more.

1.7 The ADA Limitations: Technical Infeasibility and Undue Burden

Title II does impose some restraint on the making of reasonable modifications, removal of architectural barriers, and making communications accessible. DOJ expects that these restraints will be implemented as an exception, rather than the rule.

In the 2010 Standards, technical infeasibility is defined within section 106.5 regarding Defined Terms. The City need not make retrofits when doing so is technically infeasible. Again, recognizing that the ADA sets a floor and not the ceiling, the City can choose to make the retrofit. A retrofit to an existing facility may be deemed as technically infeasible when it meets the condition described below:

“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.”

Title II also defines undue burden. The concept of undue burden typically includes three elements: undue administrative burden, undue economic burden, and fundamental alteration. DOJ requires at 35.130(a)(3) that the City bear the burden of demonstrating that denial of a request by a person with a disability rises to the level of one of these three conditions. Each is cited and discussed below.

35.150(a)(3) Undue Administrative Burden: DOJ and the US Congress recognized that there may be circumstances in which a small municipality, or a municipality in a rural area, will find it difficult to administratively obtain the personnel, devices, and processes by which it can make reasonable modifications, or remove barriers. This circumstance will be hard to show in Chandler. In a densely populated metropolitan area like the

Valley, some jurisdiction, nonprofit, or business will have addressed and resolved the request related to disability being faced by the City of Chandler.

35.150(a)(3) Undue Financial Burden: DOJ and the US Congress recognized that there may be circumstances in which a municipality will find it difficult to provide the fiscal resources to make a modification or to remove barriers. This circumstance will be hard to show in Chandler. The FY 20 Operating Budget was approved at \$927,046,172 and the FY 20 CIP Budget was approved at \$937,055,062. DOJ guidance requires that the entire City budget be considered before claiming Undue Financial Burden. As an example, if a modification for a child with a physical disability will require the removal of architectural barriers such as changes in level, cracks, gaps, and steep slopes, on the sidewalk between a residence and a public school, the City must consider operating and capital budget unexpended resources in determining whether it can grant this request for modification. With budgets in this range, it will be very difficult to show Undue Financial Burden.

As an important final note, City staff must be made aware of this. Often, municipal staff will consider only the budget for which they exercise control, in making decisions about Undue Financial Burden. That is not the correct approach. If the City Manager departs for a job in another state, and there is \$10,000 in salary savings due to that departure, it is the burden of the City to show why that \$10,000 could not be allocated to the sidewalk example above.

35.130(b)(7) Fundamental Alteration in Nature of the Service, Program, or Activity: DOJ and the Congress recognized that a circumstance may arise where a municipality will find it difficult to provide the requested modification based on disability because in doing so the fundamental nature of the service, program, or activity will be changed. As an example, beach volleyball is very popular. However, a person using a wheelchair will be unable to negotiate the sand surface in a beach volleyball court. If he or she requests a modification such as replacing the sand with a hard surface court (wood, asphalt, concrete, etc.), the City could do so, as the engineering is not complex. Were that to happen however, the very nature of sand volleyball would be changed.

These same three concepts apply to City of Chandler communications. These must be as effective for people with communication impairments as the City communications for people without disabilities are effective. Language identical to 35.150(a)(3) and 35.130(b)(7) is found at title II 35.164.

THE CITY OF CHANDLER APPROACH TO ADA COMPLIANCE

The City of Chandler has applied considerable human and fiscal resources to ADA compliance. In this portion of our report, we will review the early 1992 efforts towards compliance, the 2016 Partial Transition Plan, the 2020 Scope of Work and Transition Plan, the role of community engagement, and the role of the Mayor's Commission on People with Disabilities.

2.1 The 1992 Self-Evaluation

As noted earlier, title II of the ADA became effective on January 26, 1992. By January 26, 1993, a mere one year later, the City was to have completed a self-evaluation of programs in existing facilities and public facing policies. Importantly, only six months into the process, by July 26, 1992, the City was to identify built assets that would have to be retrofit to make the program within that asset accessible. This would have been a tall order for any municipality in the United States. Finally, and more difficult, all retrofits to existing sites to make programs at those sites accessible were to be completed by January 26, 1995, only three years after the law became effective. Virtually no municipality met this deadline.

However, many cities, Chandler included, began compliance efforts by conducting access audits of existing facilities. These cursory audits were the equivalent of a "windshield survey", noting whether a building had a ramp instead of stairs, an elevator, and accessible toilet stalls. These early audits were based on the 1991 Standards for Accessible Design, also known as the Americans with Disabilities Act Accessibility Guidelines, or ADAAG. The 1991 Standards did not address municipal recreation assets at all, such as pools, playgrounds, and sport courts and fields.

For two principal reasons, the 1992 work product is not useful today. First, the Standards have changed and now have different scoping or technical requirements, such as for reach ranges, and for maneuvering clearance. Second, the 1991 Standards did not address any park or recreation assets.

2.2 The 2016 Partial Transition Plan

In 2014, the City retained a firm to begin the access audits of selected parks, facilities, and right-of-way (ROW) assets. The 2014 project also included a "multi-format questionnaire to managers of City divisions and departments." (See page 15 of the 2016 Partial Transition Plan.) This work is best described as a pilot program to determine the likely magnitude of findings for an access audit of all sites and ROW assets.

The work did contrast Chandler sites to the 2010 Standards for Accessible Design, and to Maricopa County or State of Arizona requirements, if those were more stringent than the federal requirements. For ROW assets, the audits contrasted City assets to the federal Public Right-of-Way Accessibility Guidelines (PROWAG), published in 2011 by the US Access Board, and to Maricopa County or State of Arizona requirements, if those were more stringent than the federal requirements. It is important to note here that while PROWAG has not been appended to the 2010 Standards, it does still apply to all federal agencies. Therefore, City of Chandler ROW projects that are funded with federal resources must adhere to PROWAG.

The facilities and parks audited in 2014 are found in the table below (see page 14 of 2016 Partial Transition Plan).

Senior Center	Community Center
Chandler Municipal Court	Airport Terminal
Transportation and Development Building	Main Police Department (lobby, holding cells)
Transit Station – Chandler Mall	Chandler Downtown Library
Tumbleweed Recreation Center and Park	Snedigar Recreation Center and Ballfields
AJ Chandler Park	Folley Park and Restroom
Arrowhead Meadows Park	Desert Breeze Park
Transit Station – Snedigar	Transit Station – Tumbleweed
Nozomi Park	Tibshraeny Family Park
Espee Park	Library – Sunset Branch

The pilot study for ROW assets occurred at several locations, described below. At each, the audit addressed sidewalks, intersections, curb ramps, signals, benches and bus stops, and general pedestrian pathways.

- The first location was 6.8 miles of downtown blocks, bounded by Delaware Street, Frye Road, and Arizona Avenue. The street corridors reviewed included Chandler Boulevard (McClintock Road to Price Boulevard), Arizona Avenue (Buffalo Street to Frye Road), Hartford (Erie Street to Galveston Street), Aviation Drive, Palomino (Dobson Road to Hartford Street), and the Downtown Business District.
- Two other intersections were evaluated. These were Alma School Road and Ray Road, and Dobson Road and Chandler Boulevard.
- Finally, at the 20 sites in the table above, pedestrian infrastructure serving those parks and facilities were audited.

The results of the access audits of parks, facilities, and ROW assets were used to create a twenty-year Transition Plan. This report builds on that work, and to the greatest extent possible, incorporates the 2016 recommendations into the 2020 Transition Plan.

2.3 The 2020 Scope of Work and Transition Plan

In 2017, the City issued a Request for Qualifications (RFQ) to complete access audits of the remaining 87 parks and facilities owned or operated by the City. The scope also included audits of ROW assets. Specifically, in FMA 1 through 40, arterials, collectors, and locals were audited. In FMA 41 through 80, only arterials and collectors were audited.

The work for this project began in January, 2018. The City retained the WT Group, LLC (WTG) Accessibility Practice. WTG oversaw the audits of parks and facilities, and subcontracted the ROW work to two firms: Wood (then known as Amec Foster Wheeler) and BPG Design Group. We note that City of Chandler pools were audited in 2010, under a separate project. That work was performed by our firm, WTG.

The audits of sites and facilities began quickly, with WTG teams in Chandler in late January and February. Wood and BPG also started in the winter, driving streets and using a LiDAR program to map and evaluate the ROW assets.

City of Chandler ADA Transition Plan
November 10, 2020 page 15

The parks and facilities audited during this stage include those in the table below. Two sites were under construction and were not audited: Citrus Vista Park and Winn Park.

Amberwood Park	Apache Park
Arbuckle Park	Armstrong Park
Armstrong Yard – Fleet Services	Armstrong Yard – Streets & Traffic
Armstrong Yard – Waste & Wastewater	Ashley Trail
ASU Chandler Innovation Ctr (parking)	Basha Library
Bear Creek Golf Complex	Blue Heron Park
Boys & Girls Club – East Valley	Brooks Crossing
Centennial Park	Chandler City Hall Complex
Chandler Fire HQ	Chandler Water Treatment Facility
Chuckwalla Park	Chuparosa Park
Crossbow Park	Dobson Park
East Mini Park	Environmental Ed Center
Facilities Service Center	Family Investment Center
Fire Mechanical Maintenance	Fire Station 1
Fire Station 2	Fire Station 3
Fire Station 4	Fire Station 5
Fire Station 6	Fire Station 7
Fire Station 8	Fire Station 9
Fire Station 10	Fire Training Facility
Fox Crossing Park	Gazelle Meadows Park
Hamilton Library	Harmony Hollow Park
Harris Park	Harter Park
Hoopes Park	Information Technology Dept.
Jackrabbit Park	La Paloma Park
Los Altos Park	Los Arboles Park
Maggio Ranch Park	McCullough-Price House and Museum
Mountain View Park	Navarrete Park
Ocotillo Water Reclamation	Park Manors Park
Paseo Trail	Paseo Vista Recreation Area
Pecos Ranch Park	Pequeno Park
Pima Park	Pine Shadows Park
Pinelake Park	Price Park
Provinces Park	Pueblo Alto Park
Quail Haven Park	Recycling & Solid Waste Collection Center
Reverse Osmosis Facility	Richard T. Felix Property & Evidence Building
Road Runner Park	Ryan Park
San Marcos Park	San Tan Park
Shawnee Park	Snedigar Sportsplex
South Police Substation	Stonegate Park
Summit Point Park	Sundance Park
Sunset Park	Thude Park
Valencia Park	Veteran's Oasis Park
West Police Substation	Windmills West Park
Xeriscape Demonstration Garden	

After each access audit, a site report was prepared. Site reports describe the deficit, recommend a solution, and apply the program access test. The program access test is a critical part of the scope of work for this project. There is adequate guidance on this subject from the Department of Justice. The program access test typically arises in two ways.

First, if the City has a recurring asset, it is clear that not necessarily every existing site with that asset must be made accessible. This applies to libraries, playgrounds, sports courts, sports fields, trails, shelters, and other similar assets that exist at parks and other locations throughout the City. The rationale here is described in title II at 35.150(b). Using playgrounds as an example, the City can have the “program” of playgrounds at different locations, some accessible and some not accessible. Over time, as the existing playgrounds that are not accessible age out and are replaced, these sites will be subject to the 35.151 new construction requirements and will be made accessible. Prior to that, the City does have an affirmative obligation to retrofit some existing playgrounds.

The DOJ does not require that a ratio or percentage of recurring assets be made accessible. In our work, we have recommended that a minimum of one-of-three recurring assets be made accessible. This approach to the program access test has worked well in high-profile projects such as federal agency settlement agreements, state enforcement agency orders, and court ordered settlements. A key to program access implementation is dispersion. Again using playgrounds, not every accessible playground can be located in one end of the City. Accessible assets should be dispersed for the enjoyment of all, throughout Chandler.

Second, if the City has a unique site, such as City Hall or the Environmental Education Center, the 35.150(b) allowance for one site being accessible and another site with the same amenities being accessible is ineffective. Certainly some City Hall meetings could be relocated to another facility, but not all. Same concept applies to a unique site like the Environmental Ed Center. In such a circumstance, the site will be made accessible.

A key element of the 2020 scope of work is the development of a phased retrofit schedule, or Transition Plan. This 2020 Transition Plan blends the work completed earlier in 2011 and in the 2016 Partial Transition Plan, with the work completed in 2020. The 2020 work meets and exceeds the title II 35.150(d) requirements, and also includes cost references for planning purposes.

The order of retrofit in the Transition Plan was influenced by City staff suggestions, the 2016 work product, and community engagement, which is discussed in the next section of this report. See Section 4 of this Final Report for details on the Transition Plan. In our recommendations to the City of Chandler, the Transition Plan extends to 2040.

The City also sought GIS data for the reports. Working with City staffs, we identified a format that was useful to staff and that too was provided as a deliverable.

Lastly, the 2016 Partial Transition Plan included an analysis of how divisions and departments were meeting the title II requirements with regards to policies, communications, and programs. That work was not in this 2020 scope, but we have, under separate cover, provided a report with recommendations to the City regarding policies, inclusion of people with disabilities in programs, and related matters such as a 35.107 solutions process, a service animal policy (see Appendix E), and guidance regarding the balancing of ADA mandates with any coronavirus restrictions.

2.4 Community Engagement

The City recognized the importance of robust community engagement. Our firm worked with City staff to plan and conduct four public feedback sessions. Two sessions were related to access preferences and priorities for parks and facilities, and two were related to ROW assets.

The first two sessions were conducted in the afternoon and evening of March 4 and addressed ROW assets and the access preferences and priorities of attendees. During the session, the title II requirements for retrofit of ROW assets were reviewed. Title II describes in great detail (see 35.150(d)(2)), as it clearly makes ROW serving City of Chandler assets, Maricopa County assets, Chandler Public Schools assets, and State of Arizona assets the highest priority. Next in line are ROW assets serving retailers, employers, nonprofits and faith-based entities, and lastly, residential ROW.

The second two sessions were conducted the afternoon and the evening of March 5 and addressed parks and facilities. During the sessions, we reviewed title II requirements for existing parks and facilities, and then sought the access preferences and priorities of attendees. Unlike ROW assets, there is no regulatory guidance for parks and facilities. The program access test, as discussed earlier, guides decisions by the City of Chandler in this regard.

A community engagement report was provided to City staff under separate cover.

2.5 Mayor's Committee for People with Disabilities

In 1990, the year in which the ADA was signed into law by President George Herbert Walker Bush, the City of Chandler created the Mayor's Committee for People with Disabilities. The mission of the Committee is "...to serve as a liaison between the citizens of Chandler who have disabilities, and/or those who serve individuals with disabilities and the City Council for the City of Chandler." Examples of tasks undertaken by the Committee include advising City Council on policies, rules, and regulations relating to issues experienced by people with disabilities in the Chandler community. These may include accessibility in general, education, and employment.

The Committee members serve as advocates for those in the community with physical and mental disabilities, birth defects, injuries sustained due to accidents, illnesses, and age-related disabilities. The Committee includes nine members, and are all appointed by the Mayor, with approval by Council. Eight members must be "qualified electors", and residents for at least one year prior to their appointment. One member may be a resident of the local metropolitan area for one year, preceding appointment. Each member serves a three-year term, and shall serve until his or her successor is appointed. Vacancies during a term "shall be filled by the Mayor" with approval by the Council.

Committee Members in 2020 are: Joan Barron, Jeff Deaver, Peg Smith, Janet Rosen, Ted Maish, Kim Foy, John Marlatt, Kara Swierz, and Lisa Davis. The Committee is staffed by a City employee, Collette Prather. Committee members and City staff assigned to the Committee were active participants in this process, promoting the community engagement opportunities and encouraging attendance by people with disabilities.

ACCESS AUDIT FINDINGS AND RECOMMENDATIONS

The purpose of this portion of the report is to review the methodology used to audit City sites and ROW, how retrofit priorities were established for City sites and ROW, how site reports were prepared, some of the findings regarding parks, some of the findings regarding facilities, and some of the findings regarding ROW assets.

3.1 Methodology for Parks and Facilities Audits

City of Chandler parks and facilities, and the elements within them, were audited for compliance with the federal 2010 Standards for Accessible Design, State of Arizona access requirements that are more stringent than the federal standards, and any local access requirements that are more stringent than federal standards. We also applied the concept of safe harbor (see 1.4 above) to building elements that were designed and constructed in compliance with the 1991 Standards. Finally, we applied smart practices used in Arizona and elsewhere, by other municipalities, to address elements that are not yet a final and enforceable standard, such as the flying field at Thude Park.

Using checklists for site elements, created specifically for the City of Chandler, we worked in teams of two to complete the site audits. One team member recorded observations, while the other managed the metrics of the audit, measuring dimensions, height, slope, and other as-built conditions. We measure everything, and the completed checklists serve as a risk management tool, identifying not only what is **not** compliant, but what is compliant.

The tools used in this process are simple: digital 2' levels, GPS enabled digital cameras, tape measures, pounds of force door gauges, and a laptop to record observations. Audit quality controls included reviewing checklists and matching digital images, revisiting a small number of sites, and mentoring by senior auditors.

The project also included the pilot audit of two sites: Pima Park, and the Armstrong Yards Streets and Traffic offices. The purpose of these pilot audits was twofold: first, to demonstrate the audit methods to City staff, and second, to prepare and review a site report with City staff. Those tasks were intended to develop a site report that City staff would find useful. Discussed later in 3.3, the site reports provided met with the satisfaction of City staff as to specificity of the deficits, and the location of the deficits.

This methodology is different than that used in the 2016 work product. The 2020 scope did not include a second audit of the sites audited in the 2016 Partial Transition Plan. The earlier work has been accepted and integrated into the 2020 Transition Plan (see section 4.6 later in this report).

3.2 Priorities for Parks and Facilities

In preparing priorities for retrofits at facilities and parks, three concepts guided the work. First, the program access test was applied to recurring assets at City sites (see 1.4 of this report, and again below in this section). Second, City staff was asked for their feedback on the factors to be used in establishing an order of retrofit (see 4.2 of this report). Third, the community was engaged and asked for their own access preferences and priorities (see 4.1 of this report).

Other factors were considered too, for example, dispersion of accessible recurring assets is a critical part of determining an order of retrofit.

The test for existing facilities is known as the “program access test”. A “program” is an opportunity made available by the City. See section 1.4 earlier in this report.

We note early in this section that the program access test does not apply to new construction. New construction must be designed and constructed to comply with the 2010 Standards for Accessible Design.

In the title II regulation, section 35.150(b) describes the methods an entity can use to make programs accessible. They include:

- Redesign or acquisition of equipment;
- Reassignment of services to accessible buildings;
- Assignment of aides to program beneficiaries;
- Delivery of services at alternate accessible sites;
- Alteration of existing facilities and construction of new facilities;
- Use of accessible rolling stock or other conveyances; and
- Any other methods that result in making its services, programs, and activities readily accessible to and usable by individuals with disabilities.

Importantly, this section notes that a “...public entity is not required to make structural changes in existing facilities...” when any other method, such as those noted above, are effective. An element of the program access test is dispersion. For example, if there are 20 recurring assets in City parks, the number to be accessible shall be dispersed throughout the City.

What is the right number, or ratio of accessible to inaccessible, for recurring assets? The correct answer varies from city to city. US DOJ has not and likely never will establish a ratio or percentage. We do know that DOJ guidance indicates that unique or infrequently occurring assets are more likely to require alteration than frequently occurring assets. Our approach is that a minimum of one of three recurring sites shall be accessible. Additionally, unique sites shall be accessible.

There is an important exception. The 2010 Standards for Accessible Design note that when meeting the technical requirements, if the movement of a load bearing wall or element is required, technical infeasibility may arise. The City need not make alterations at a site when it is technically infeasible to do so. However, even if technical infeasibility does apply, the City is obliged to retrofit other elements not affected by the load bearing wall or element.

The program access test for the City of Chandler and other units of state and local government is radically different than the approach to existing facilities that a business or nonprofit may take.

Our approach of one-of-three has been accepted by Federal District Courts, the US DOJ, the District of Interior, state courts, and state enforcement agencies. We know it is an effective approach that allows cities to optimize resources and make sites accessible to residents.

In subsequent discussions regarding playgrounds and other assets we apply our interpretation of the program access test. This section is a summary; for detailed retrofit recommendations, see the individual site reports. For each type of asset, we note whether we believe the asset is accessible; whether the asset should be retrofit for accessibility; or whether the asset should be left as is and inaccessible, because the asset category satisfies the program access test. We take no position as to whether the City has a number of assets in a category, e.g., picnic areas that is adequate to the demand for picnicking in Chandler. That is not within our scope.

3.3 Detailed Site Reports

After each park or facility was audited, a comprehensive site report was prepared. The site report follows the format agreed to by City staffs, as a result of the pilot site audits. The site reports provide great detail for City staff, including:

- A description of the deficit, e.g., a note that an Automated External Defibrillator (AED) is mounted at 54" aff, which is higher than the maximum reach range of 48" aff
- A description of the solution, such as lower the operable part of the AED to a maximum of 48" aff
- Hyperlinks to completed checklists used during the audit
- Hyperlinks to images that document the deficit and locate it clearly, so that staff know exactly which accessible parking stall is too narrow, for example

The site reports are also hyperlinked to the Transition Plan Excel spreadsheet.

The draft site reports were provided to the City in 2018 and 2019.

3.4 Parks Findings

At the 62 City of Chandler parks, there were some common access deficits. These were likely present at parks audited for the 2016 Partial Transition Plan. These are reviewed below, with recommendations for the City as to how these should be addressed. For greater detail, see the site reports and supporting completed checklists.

Maintenance

The City uses a conscientious staff to maintain its parks and facilities. However, over time, every site yields to wear and tear. The recommendations below describe ways in which attention to maintenance can specifically address some access deficits.

1. **Provide training** to maintenance staffs regarding the features of an accessible route and how to ensure that it remains unobstructed so that park amenities, e.g., garbage cans or signs, are placed adjacent to the accessible route.

2. **Purchase some new tools.** The City needs battery-powered 2' digital levels. Do not use 4' levels, as these are more forgiving of slope deviations. If a complaint is filed against the City, the plaintiff expert will use 2' levels, and therefore, so should the City.

Changes in Level and Gaps

The routes and sidewalks that make up the City's network of accessible routes are in fair condition. Wear and tear, settling, weather, and other factors combine to cause changes in level and gaps along portions of those accessible routes, making that portion noncompliant and a barrier to many customers with physical and sensory disabilities.

Removing changes in level and gaps has a significant universal design benefit too, as more people with all types of conditions can more easily use City routes, such as staff pushing carts of supplies, parents with kids in strollers, and people using an assistive device such as a wheelchair, Segway, or walker.

3. **Add change in level of more than .25" to maintenance safety checklists** in 2021. This will help identify and correct these problems before they expand. Make or buy pre-measured shims and distribute to employees for their use and ease of measurement.
4. **Add inspections for gaps of greater than .5" to maintenance safety checklists** in 2021. Identify and fill these gaps before they expand. **In the alternative, consider resurfacing segments of deteriorated asphalt routes.**
5. **Eliminate changes in level.** Using the rationale that the most severe changes in level are the greatest barriers to access, make changes in level of greater than .75" the highest priority. Make changes in level of between .5" and .75" the second priority. Make beveling of changes in level of .25" to .5" the third priority. ***Consider acquiring or contracting for a grinder.***

Accessible Parking

The City maintains approximately 1,900 standard parking spaces at sites, and 100 more that are designated as accessible parking stalls. The test for the ratio of accessible stalls to all stalls is per parking lot. See the site reports for details. As an alternative to a site-by-site approach, the City could address these regionally to eliminate inconsistencies, and for cost-efficiency.

6. **Create a parking stall template.** A suggested template is below.
 - Stalls are a minimum of 8' wide.
 - An adjacent access aisle must also be a minimum of 5' wide. The access aisle must be diagonally striped with **high quality paint**. The access aisle can be shared by two accessible stalls.
 - The collection of signs must include the US Department of Transportation R7-8 standard sign (the blue icon in a wheelchair). Below that must be the statewide fine sign. Also required is a third sign, on at least one stall per lot, that says VAN ACCESSIBLE. This stall must be 11' wide with a 5' access aisle. An acceptable alternate is 8' and 8'.

- The bottom edge of the R7-8 sign is a minimum of 60" above the finished grade. Center the signpost at the head of the accessible stall, and ensure that the curb cut and detectable warning run the distance of the access aisle.
 - **The most common deficit** in accessible parking stalls and access aisles is the slope. The 2010 Standards limit the slope to **not more than 2.08% in any direction. This is a challenging requirement that can take considerable effort to meet.**
 - The access aisles should connect to an accessible route. The maximum running slope for the accessible route is 5%, and to account for heaving and settling, we recommend 4%. The maximum cross slope is 2%.
 - The loading zone must have an access aisle adjacent and parallel to vehicle pull-up space. The loading zone access aisle must be a minimum of 60" wide and 20' long.
7. In the years to come, **implement a plan to correct or refresh every accessible stall** at every City facility. Incorporate this task into other plans that require parking lot repair, restriping, or resurfacing.

Running Slope and Cross Slope

There are parks where the running slopes are steeper than permitted. At some sites this was a minimal issue, but at other sites it was a significant variance. This condition naturally occurs when concrete settles, or when connections between new and old routes are off by fractions of an inch. Cross slope is equally important, as it serves drainage as well as access purposes.

8. **Revise standard specifications and details** so that in new construction and alterations the slope of the accessible route shall not exceed 1:21, or 4.7%, as opposed to 1:20, or 5%. This allows room for field error.
9. **Revise standard specifications and details** so that in new construction and alterations the ramp slope shall not exceed 1:13, or 7.7%, as opposed to 1:12, or 8.33%. This allows room for field error. It also makes ramps easier to use for everyone, not just people with disabilities. This universal design approach is also a risk management tool.
10. **Revise standard specifications and details** so that in new construction or alterations the cross slope shall not exceed 1.5%, leaving room for error in the field.

Playgrounds for Children 2 to 5 years-old

The **minimum required** of the City by title II of the ADA is that the "program" of playgrounds be accessible to residents. This is measured by the "program access test" described in section 35.150 of the title II regulation (see 28 CFR Part 35). For similar multiple sites, no guidance is given as to how many existing playgrounds should be made accessible. Again, a good practice is to treat this as a planning exercise and aim for 1 of 3 playgrounds being made accessible.

Our evaluation included 28 two to five playgrounds. Of these, 16 are accessible. We recommend access to five more. Any new playgrounds to be replaced at any time in the future must comply with the 2010 Standards and will therefore be accessible. This exceeds the 1:3

due to the current number of accessible play areas. The five additional playgrounds to be “made accessible” require only regular maintenance to the surface for compliance.

The Program Access Chart, along with City of Chandler 2 to 5 Play Area Map at the end of this section, illustrates the areas where work is recommended so that every resident of the City is close to an accessible age 2 to 5 playground. [[City of Chandler 2 to 5 Play Area Map](#)]

11. **Maintain surfaces and components**, per the site reports, so that the playgrounds at the sites below **remain** accessible:

- Centennial Park
- Chuckwalla Park
- Dobson Park
- Gazelle Meadows
- Harter Park
- Hoopes Park
- Maggio Ranch Park
- Mountain View Park
- Pinelake Park
- Price Park
- Pueblo Alto Park
- Roadrunner Park
- Ryan Park
- San Tan Park
- Stonegate Park
- Windmills West Park

12. **Maintain surfaces and components**, per the site reports, so that the playgrounds at the sites below **become** accessible:

- Arbuckle Park
- Blue Heron Park
- Brooks Crossing Park
- Crossbow Park
- Valencia Park

13. **Leave as is** the playgrounds at the parks named below, and if future alterations or renovations occur at those sites, make them accessible.

- Amberwood Park
- Apache Park
- Paseo Vista Recreation Area
- Pima Park
- Pine Shadows Park
- Shawnee Park
- Sundance Park

14. **Advertise the accessible playgrounds** in the City website and publications. This is an important way to make the public aware of opportunities, and complies with the section 35.106 notice requirement in the title II regulation.

Playgrounds for Children aged 5 to 12 years-old

The **minimum required** of the City by title II of the ADA is that the “program” of 5 to 12 playgrounds be accessible to residents. This is measured by the “program access test” described in section 35.150 of the title II regulation (see 28 CFR Part 35). For similar multiple sites, no guidance is given as to how many existing playgrounds should be made accessible. Again, a good practice is to treat this as a planning exercise and aim for 1 of 3 playgrounds being made accessible. Our evaluation included 54 playgrounds. Of these, 29 are accessible.

We recommend access to eight more with minor surface corrections. Any new playgrounds to be replaced in the future must comply with the 2010 Standards and will therefore be accessible. This exceeds the 1:3 due to the current number of accessible play areas. The eight additional playgrounds to be “made accessible” either require regular maintenance to the surface for compliance or were on the Phase One site list in the 2016 Partial Transition Plan.

The Program Access Chart, along with City of Chandler 5 to 12 Play Area Map at the end of this section, illustrates the areas where work is recommended so that every resident of the City is close to an accessible age 5 to 12 playground. [[City of Chandler 5 to 12 Play Area Map](#)]

15. **Maintain surfaces and components**, per the site reports, so that the playgrounds at the sites below **remain** accessible:

- Centennial Park
- Chuckwalla Park
- Chuparosa Park
- Crossbow Park
- Dobson Park
- Gazelle Meadows
- Harter Park
- Hoopes Park
- Jackrabbit Park
- Los Altos Park
- Maggio Ranch Park
- Mountain View Park
- Paseo Vista Recreation Area
- Pecos Ranch Park
- Pequeno Park
- Pinelake Park
- Price Park (1 of 2)
- Pueblo Alto Park
- Quail Haven Park
- Roadrunner Park
- Ryan Park
- San Marcos Park
- San Tan Park

- 
- Stonegate Park
 - Summit Point Park
 - Sundance Park
 - Tibshraeny Park
 - Valencia Park
 - Windmills West Park
16. **Maintain surfaces and components**, per the site reports, so that the playgrounds at the sites below **become** accessible:
- Arbuckle Park
 - Brooks Crossing Park
 - Nozomi Park
 - Pine Shadows Park
 - Snedigar Sportsplex (2)
 - Tumbleweed Park (2)
17. **Leave as is** the playgrounds at the parks named below, and if future alterations or renovations occur at those sites, make them accessible.
- Amberwood Park
 - Apache Park
 - Arrowhead Meadows Park
 - Blue Heron Park
 - Desert Breeze Park
 - East Mini Park
 - Espee Park
 - Folley Park
 - Fox Crossing Park
 - La Paloma Park
 - Navarette Park
 - Park Manors Park
 - Pima Park
 - Price Park (1 of 2)
 - Provinces Park
 - Shawnee Park
 - Sunset Park
18. **Advertise the accessible 5 to 12 playgrounds** in the City website and publications. This is an important way to make the public aware of opportunities, and complies with the section 35.106 notice requirement in the title II regulation

Trails

The **minimum required** of the City by title II of the ADA is that the “program” of trails be accessible to residents. This is measured by the “program access test” found in section 35.150 of the title II regulation (see 28 CFR Part 35). For similar multiple sites, no guidance is given as to how many existing trails should be accessible.

We recommend that a minimum of one trail of every three be accessible. We saw 49 trails. Of these, 33 were accessible. We recommend access at one more trail due to minor trail surface maintenance. This exceeds the 1:3 ratio due to the need for trail surface maintenance. The Program Access Chart at the end of this section, along with the City of Chandler Trail Map, illustrates the areas where work is recommended so that every resident is close to an accessible trail. [[City of Chandler Trail Map](#)]

19. **Make corrections** cited in the reports so the trails below **remain** accessible:

- **AJ Chandler Park**
- **Arbuckle Park**
- **Ashley Trail**
- **Blue Heron Park**
- **Centennial Park**
- **Chuckwalla Park**
- **Chuparosa Park**
- **Crossbow Park**
- **Espee Park**
- **Folley Park**
- **Fox Crossing Park**
- **Gazelle Meadows Park**
- **Harter Park**
- **Hoopes Park**
- **La Paloma Park**
- **Los Arboles Park**
- **Maggio Ranch Park**
- **Paseo Trail**
- **Pecos Ranch Park**
- **Pequeno Park**
- **Pinelake Park**
- **Quail Haven Park (2)**
- **Roadrunner Park (2)**
- **Ryan Park**
- **San Marcos Park**
- **Stonegate Park**
- **Tibshraeny Park**
- **Tumbleweed Park**
- **Valencia Park (2)**
- **Veteran's Oasis (1 of 2)**

20. **Make corrections** cited in the report so the trail below **becomes** accessible:

- **Paseo Vista Recreation Area**

21. **Leave as is**, trails at the site below and make **corrections** upon renovation:

- **Amberwood Park**
- **Arrowhead Meadows Park**

- Brooks Crossing Park
- Dobson Park
- Harmony Hollow Park
- Mountain View Park
- Pima Park
- Price Park
- Provinces Park
- San Tan Park (2)
- Sunset Park
- Thude Park
- Veteran's Oasis (1 of 2)
- Windmills West Park

22. **Advertise the accessible trails** in City website and publications.

Volleyball

The **minimum required** of the City by title II of the ADA is that the program of volleyball be accessible to residents. This is measured by the "program access test" described in section 35.150 of the title II regulation (see 28 CFR Part 35).

For similar multiple sites, no guidance is given as to how many existing volleyball courts should be accessible. There are 34 volleyball courts and five are accessible. **We recommend access to six more courts.**

The Program Access Chart at the end of this section, with the City of Chandler Volleyball Map, illustrates recommended access so that every resident of the City is close to an accessible volleyball court. [[City of Chandler Volleyball Map](#)]

23. **Make corrections** needed to **maintain access**, to courts at:

- Apache Park (2 of 4)
- Nozomi Park
- Stonegate Park
- Valencia Park

24. **Make corrections** needed to **create access**, to courts at:

- Amberwood Park
- Brooks Crossing Park
- Chuparosa Park (2)
- Harter Park
- Maggio Ranch Park

25. **Leave as is** the courts at the following sites:

- Apache Park (2 of 4)
- Centennial Park
- Chuckwalla Park

- Desert Breeze Park
- Dobson Park (2)
- Fox Crossing Park
- Mountain View Park (2)
- Navarette Park
- Pine Shadows Park
- Pinelake Park
- Price Park
- Quail Haven Park
- Roadrunner Park
- Ryan Park
- San Marcos Park
- Sundance Park
- Sunset Park
- Tibshraeny Park
- Tumbleweed Park
- Windmills West Park

26. **Advertise accessible volleyball courts** in the City website and publications.

Tennis

The **minimum required** of the City by title II of the ADA is that the program of tennis be accessible to residents. This is measured by the “program access test” described in section 35.150 of the title II regulation (see 28 CFR Part 35).

For similar multiple sites, no guidance is given as to how many existing tennis courts should be accessible. There are 25 tennis courts and 23 are accessible. **We recommend no new access.**

The Program Access Chart at the end of this section, with the City of Chandler Tennis Map, illustrates recommended access so that every resident of the City is close to an accessible tennis court. [[City of Chandler Tennis Map](#)]

27. **Make corrections** needed to **maintain access**, to courts at:

- Apache Park (4)
- Desert Breeze Park (4)
- Tumbleweed Park (15)

28. **Leave as is**, courts at the site below:

- Arrowhead Meadows Park (2)

29. **Advertise accessible tennis courts** in the City website and publications

Basketball

The **minimum required** of the City by title II of the ADA is that the program of basketball be accessible to residents. This is measured by the “program access test” described in section 35.150 of the title II regulation (see 28 CFR Part 35). For similar multiple sites, no guidance is given as to how many existing basketball courts should be accessible. There are 35 basketball courts and 30 are accessible. **We recommend no new access.**

The Program Access Chart at the end of this section, with the City of Chandler basketball Map, illustrates recommended access so that every resident of the City is close to an accessible court. [[City of Chandler Basketball Map](#)]

30. **Make corrections** needed to **maintain access**, to courts at:

- **Amberwood Park**
- **Apache Park**
- **Arbuckle Park**
- **Centennial Park**
- **Chuckwalla Park**
- **Chuparosa Park (2)**
- **Crossbow Park**
- **Dobson Park (2)**
- **Folley Park (2)**
- **Fox Crossing Park**
- **Harris Park**
- **Harter Park**
- **Hoopes Park**
- **La Paloma Park**
- **Mountain View Park**
- **Pecos Ranch Park**
- **Pequeno Park**
- **Pinelake Park**
- **Price Park**
- **Quail Haven Park**
- **Roadrunner Park**
- **Ryan Park**
- **San Marcos Park (2)**
- **Stonegate Park**
- **Tibshraeny Park**
- **Valencia Park**

31. **Leave as is** the courts at the following sites:

- **Brooks Crossing Park**
- **Maggio Ranch Park**
- **Pueblo Alto Park**
- **San Tan Park**
- **Sundance Park**

32. **Advertise accessible basketball courts** in the City website and publications.

Baseball

The **minimum required** of the City by title II of the ADA is that the program of baseball be accessible to residents. This is measured by the “program access test” described in section 35.150 of the title II regulation (see 28 CFR Part 35).

For similar multiple sites, no guidance is given as to how many existing ballfields should be accessible. There are 46 ball fields and 11 are accessible. **We recommend access to seven fields**, which exceeds the 1:3 ratio principally to address dispersion.

The Program Access Chart at the end of this section, with the City of Chandler Ballfield Map, illustrates recommended access so that every resident of the City is close to an accessible field. [[City of Chandler Ballfield Map](#)]

33. **Make corrections** needed to **maintain access**, to fields at:

- **Arrowhead Meadows (4 of 4)**
- **Desert Breeze (1 of 2)**
- **Folley Park (2 of 4)**
- **Snedigar (4 of 10)**

34. **Make corrections** needed to **create access**, to fields at:

- **Amberwood (1 of 3)**
- **Harter Park**
- **Hoopes Park**
- **Pima Park (2)**
- **San Marcos Park**
- **Stonegate Park**

35. **Leave as is** the fields at the following sites:

- **Amberwood (2 of 3)**
- **Brooks Crossing Park**
- **Desert Breeze (1 of 2)**
- **Dobson Park (2)**
- **Espee Park (3)**
- **Folley Park (2 of 4)**
- **Mountain View (2)**
- **Nozomi (3)**
- **Price Park**
- **Ryan Park**
- **San Tan Park**
- **Shawnee Park**
- **Snedigar (6 of 10)**
- **Sunset Park**
- **Thude Park**

36. **Advertise accessible baseball fields** in the City website and publications.

Horseshoes

The **minimum required** of the City by title II of the ADA is that the program of horseshoes be accessible to residents. This is measured by the “program access test” described in section 35.150 of the title II regulation (see 28 CFR Part 35).

For similar multiple sites, no guidance is given as to how many existing courts should be accessible. There are nine courts and one is accessible. **We recommend access to four more courts.** This exceeds the 1:3 ratio due to the need for dispersion within the City.

The Program Access Chart at the end of this section, with the City of Chandler Horseshoe Map, illustrates recommended access so that every resident of the City is close to an accessible court. [[City of Chandler Horseshoe Map](#)]

37. **Make corrections** needed to **maintain access**, to courts at

- **Pinelake Park**

38. **Make corrections** needed to **create access**, to courts at:

- **Pima Park (2 courts)**
- **Valencia Park (2 courts)**

39. **Leave as is** the courts at the following sites:

- **Armstrong Park**
- **La Paloma Park**
- **Tumbleweed Park (2)**

40. **Advertise accessible horseshoe courts** in the City website and publications.

Athletic Fields

The **minimum required** of the City by title II of the ADA is that the program of athletic fields be accessible to residents. This is measured by the “program access test” described in section 35.150 of the title II regulation (see 28 CFR Part 35).

For similar multiple sites, no guidance is given as to how many existing fields should be accessible. There are 29 fields and 14 are accessible.

We recommend access to four more fields. It is necessary to make four more fields accessible so that accessible fields are adequately dispersed throughout Chandler. This does exceed the 1:3 ratio due to the need for dispersion within the City.

The Program Access Chart at the end of this section, with the City of Chandler Athletic Fields Map, illustrates recommended access so that every resident of the City is close to an accessible field. [[City of Chandler Athletic Field Map](#)]

- 
41. **Make corrections** needed to **maintain access**, to fields at:
- Desert Breeze
 - Snedigar Sportsplex (10)
 - Tumbleweed (3 of 7)
42. **Make corrections** needed to **create access**, to fields at:
- Chuparosa Park (1 of 2)
 - Hoopes Park
 - Pima Park (2)
43. **Leave as is** the fields at the following sites:
- Chuparosa Park (1 of 2)
 - Mountain View Park
 - Navarette Park
 - Shawnee Park (3)
 - Thude Park
 - Tumbleweed (4 of 7)
44. **Advertise accessible athletic fields** in the City website and publications.

Picnic Areas and Picnic Shelters

The **minimum required** of the City by title II of the ADA is that the “program” of picnicking be accessible to residents. This is measured by the “program access test” described in section 35.150 of the title II regulation (see 28 CFR Part 35). For similar multiple sites, no guidance is given as to how many existing shelters should be accessible.

There are 145 picnic areas and picnic shelters and 103 are accessible. **We recommend access to six more. Many of these added sites merely need accessible tables or minor corrections. One shelter to be added is the sole shelter on the Paseo Trail, and the five at Paseo Vista need minor surface correction.** This exceeds the 1:3 ratio due to the existing number of accessible picnic areas and minor correction needed at the others.

The Program Access Chart at the end of this section, with the City of Chandler Picnic Areas/Shelters Map, illustrates accessible picnic areas so that every resident of the City is close to an accessible picnic area/shelter. [[City of Chandler Picnic Areas/Shelters Map](#)]

45. **Make corrections** needed to **maintain or create access**, including adding tables, to shelters at:
- Amberwood Park
 - Apache Park (3 of 5)
 - Arrowhead (1 of 6)
 - Armstrong Park
 - Blue Heron Park (2)
 - Centennial Park (2)
 - Chuckwalla Park (3)

- Chuparosa Park (2 of 3)
- Crossbow Park
- Desert Breeze (11)
- Dobson Park (2 of 3)
- Espee (3)
- Folley Park (7)
- Fox Crossing Park
- Gazelle Meadows (1 of 5)
- Harris Park
- Harter Park
- Hoopes Park (3)
- La Paloma Park
- Nozomi Park (2)
- Park Manors
- Paseo Trail
- Paseo Vista Recreation Area (5)
- Pecos Ranch Park
- Pequeno Park
- Pima Park (6)
- Pinelake Park
- Price Park (2 of 3)
- Provinces Park
- Pueblo Alto Park
- Quail Haven Park (1 of 3)
- Roadrunner Park (4)
- Ryan Park (1 of 3)
- San Marcos Park (2)
- San Tan Park (1 of 2)
- Shawnee Park (3)
- Stonegate Park
- Sundance Park
- Sunset Park (2)
- Tibshraeny
- Tumbleweed (18)
- Valencia Park
- Veteran's Oasis Park (4 of 5)

46. Leave as is the picnic areas/shelters at the following sites:

- Apache Park (2 of 5)
- Arbuckle Park (2)
- Arrowhead (5 of 6)
- Brooks Crossing Park
- Chuparosa Park (1 of 3)
- Dobson Park (1 of 3)
- Gazelle Meadows (4 of 5)
- Los Altos Park
- Maggio Ranch Park

- **Mountain View (3)**
- **Navarette Park (7)**
- **Pine Shadows Park**
- **Price Park (1 of 3)**
- **Quail Haven Park (2 of 3)**
- **Ryan Park (2 of 3)**
- **San Tan Park (1 of 2)**
- **Veteran's Oasis Park (1 of 5)**

47. **Advertise accessible shelters/picnic areas** in the City website and publications.

3.5 Facilities Findings

At the 52 City of Chandler facilities, there were some common access deficits. These were likely present at facilities audited for the 2016 Partial Transition Plan, and in the 2011 work regarding City of Chandler pools.

These are reviewed below, with recommendations for the City as to how these should be addressed. For greater detail, see the site reports and supporting completed checklists.

48. **Purchase some new tools.** The City needs tools to measure pounds of force to open doors in facilities that are designed for this purpose. These tools can be assigned to staff for scheduled spot-checks at doors.
49. **Add door closer checks** to maintenance staff checklists, and record observations on a regular basis. When too much force is required to open a door, adjust the closer.

Obstructed Accessible Routes

Employees **may** see an accessible route as an empty 36" wide space in which a potted plant or garbage can is a perfect fit. However, that blocks or obstructs the accessible route.

50. **Provide training to maintenance, supervisors, and administration staffs** regarding maintenance of accessible routes in facilities.

Employee Work Areas

City of Chandler employs many qualified and skilled full time staff, making services available to residents. The City employs many more on a part-time or seasonal basis. The City likely has employees with disabilities and in the future, will have **more** employees with disabilities, in all categories: full time, seasonal, and regular part time.

It is important to address access to work areas, and both the title II regulation and the work of the US Access Board do so. In section 203.9 of the 2010 Standards for Accessible Design, the treatment of employee areas is made clear.

Generally, a person with a disability should be able to **approach**, **enter**, and **exit** the work area. This is addressed by requirements for accessible routes and accessible means of egress. Other factors are door width, and threshold changes in level.

However, certain types of common areas, such as the ones below, must meet the requirements of the 2010 Standards as they are excluded from the definition of employee-only areas. The rationale for the exclusion is that an employee is not working when he or she is eating or having coffee or using the restroom. The common areas in employee work spaces that must be treated as public spaces are:

- corridors;
- toilet rooms;
- kitchenettes for employee dining use, and
- break rooms.

In short, the key issues are the accessible route, changes in level, doors and entries, and maneuvering space once within the work area. This approach is effective so long as when the City hires an employee with a disability, or a current employee acquires a disability, the City will remove architectural barriers in work areas or make other reasonable accommodations, called out in title I of the ADA. The recommendations below are important for City employees.

51. **Address accessibility in the City personnel policies**, and note that, upon request by an employee, the City will make reasonable accommodations, which **may** include the removal of architectural barriers in work spaces, or the relocation of an employee to an accessible workspace.
52. **Require new construction, and alterations or additions** that include employee work areas, to be designed and constructed so they are compliant with the 2010 Standards for Accessible Design.

Door Opening Force Requirements

City buildings have approximately 1,700 doors. Many have closer mechanisms. Some of these need adjustment to bring the pounds of force (lbf) necessary to open the door into compliance (5 lbf for interior doors and 8.5 lbf for exterior doors). However, some of the closers are just old. The wear and tear of 20 or more years erodes the closer effectiveness.

53. **Evaluate and determine the age of door closers.**
54. **Add door closer maintenance checks** to safety checklists in 2021 and for closers with 10 years of service or less, aggressively maintain them for effectiveness.
55. **Purchase and install new door closers** for all exterior doors (with closers 20 years old or more) and 50% of interior doors as soon as is possible.
56. **Purchase and install** new door closers for all remaining interior doors (with closers 20 years old or more) as soon as is possible.
57. **Consider acquiring, installing, and maintaining** power assisted door openers for City facilities with heavy consumer traffic.

Signage

City signs serve several purposes. First, signs assist wayfinding in large sites such as the General Administration building.

Second, signs identify important permanent elements of facilities, such as restrooms. Third, signs facilitate access by people with vision and physical limitations. The City may use a sign template so that the presentation and information on signs is consistent.

The 2010 Standards treats two types of signs differently. Signs for permanent spaces, such as a bathroom, must be in both Grade 2 Braille and raised lettering. Signs that are directional or informational only require visual lettering of a certain size. Be certain to incorporate these approaches into signs in buildings and sites operated by the City.

58. **Revise the sign template in use by the City** in 2021, that describes where and in what facilities signs will be used. The template could include:

- size of sign
- mounting height
- mounting location
- size of characters
- space between characters
- contrast between characters and background
- icons or symbols used in the signs
- City information in the signs (name of facility? phone number? main office number?), and more.

59. **Implement signage template and refresh** City signs in the future.

Bathrooms

Bathrooms are an essential part of a visit to a City of Chandler site. Exercise, social activities, food and beverage, and more all rely on one of the oldest designs known to us. Making those facilities accessible is tremendously important.

60. **Develop a bathroom template in 2021.** Confirm it with the State of Arizona. This is a list of criterion for restrooms, not a design template. ***Be sure to include temporary facilities such as portable toilets in the template.*** The template should address the toilet, grab bars, items in the stall such as toilet paper and hooks, the stall, operating mechanisms, mirrors, sinks, hand towels, and more.

61. **Include bathroom renovations** at facilities in the City of Chandler's Capital Improvement Plan.

- 
- 62. **Consider the use of automatic flush controls.** These have environmental benefits and are also a great way to eliminate some accessibility problems.
 - 63. **In the interim, implement non-structural modifications recommended in the site reports,** such as lowering mirrors, remounting grab bars, changing the height of toilets and urinals, relocating toilet paper, installing compliant stall hardware, and so forth. These less costly changes on a site-by-site basis will serve customers well until resources are available to renovate restrooms on a comprehensive scale.
 - 64. **Make at least one portable toilet,** if one is provided at a site, accessible. This includes a portable toilet placed at a picnic shelter or adjacent to sports fields. These must be accessible and must be served by **an accessible route. The City has sites with portable toilets; this must be addressed. Use the single-user toilet checklist, and require compliance by City vendors.**

Alarms

In existing facilities where an aural or audible fire alarm system is provided, a visual alarm is not required unless the building was constructed after January 26, 1992 or has been upgraded since that same date.

If an alarm in an existing facility is audible only, it need not be modified to include a visual alarm unless it is replaced or upgraded in the future.

- 65. **Determine in 2021** if systems have been upgraded or replaced since 1992.
- 66. **Develop a plan in 2022** for the installation of aural and visual alarms in renovations.
- 67. **Retrofit construction that has occurred since 1992** to include aural and visual alarms as soon as is possible.

Maintenance Buildings

Maintenance areas are addressed in specific site reports, and employee areas are addressed earlier in this report. We note earlier that the City can apply a different standard to employee work areas, but we note that employee work areas are not exempted from access requirements. City maintenance staff should receive training in regard to the application of the **approach, enter, and exit** strategy so that they understand the reason for the various requirements.

- 68. **Train maintenance staff supervisors** in accessibility concepts that are applicable to the maintenance building.
- 69. **Implement recommendations regarding parking, accessible route, changes in level, gaps, doors, and alarm systems** at the maintenance areas.

3.6 Methodology for ROW Audits

The City ROW assets were evaluated for compliance with the Public Right-of-Way Accessibility Guidelines (PROWAG). PROWAG was published in 2011 by the US Access Board, a small federal agency with rulemaking authority for other federal agencies, including the US

Department of Transportation (US DOT). Under the ADA and other federal laws, when a state or local government receives funds from US DOT, it must adhere to PROWAG.

To determine access deficits, geometric information was collected for sidewalks, curb ramps, and driveways. The data was collected using a mobile mapping (LiDAR) scanning vehicle, creating a point data cloud of the environment with a high resolution 360-degree camera taking continuous images. The vehicle drove every roadway in both directions of travel to ensure complete coverage of ROW and adjacent properties.

Imagery was collected for approximately 616 centerline miles, or 1,232 miles in both directions. Other data collected included 650 miles of sidewalks, 10,629 driveways, and 13,778 curb ramps.

Data was then extracted through a semi-automated process, allowing for the creation of most sidewalk features, as well as identification of curb ramps and driveways. Following extraction, desktop assessments were completed to identify access deficits. Photographic images were then draped on top of the LiDAR point cloud data to assure for accuracy in measurements.

The attached ROW Transition Plan uses point, line, and polygon features to correspond with the various geometries of accessibility assets from access ramp flares. This approach was reviewed and accepted by the City.

Each ROW accessibility asset was evaluated based on several attributes. For example, sidewalks were evaluated based on status (whether they exist or not), width, cross slope, running slope, rad grade slope, sidewalk material, raised crossing, flush to roadway, flush sidewalk barrier, failures, and gaps in the route. These attributes were analyzed based on existing geometric values, and then a compliance category was assigned. The analysis resulted in an ordering of retrofits based on severity of the deficit and assets served by the ROW.

For detail regarding data collection and analysis, see the ROW Transition Plan (Appendix A).

3.7 Priorities for ROW Retrofits

The US DOJ title II regulation is clear regarding the priorities for ROW retrofits. At 35.150(d)(2) it says:

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.

See section 1.5 of this report for elaboration. Following this guidance, the City of Chandler ROW Transition Plan orders retrofits by severity of the deficit, and by type of entity served by the asset. Priority One is for ROW assets serving State of Arizona, Maricopa County, City of Chandler, and Chandler Public School District sites and facilities. Priority Two is for ROW assets serving publicly and privately funded hospitals, doctor's offices, and health clinics.

Priority Three is for ROW assets serving retail locations and major employers. Priority Four is for ROW assets serving nonprofits, including private schools. Priority Five is for ROW assets serving housing facilities and high density housing, as well as for senior housing. Priority Six is for ROW assets serving residential areas.

For more detail regarding ROW retrofit priorities, see the ROW Transition Plan (Appendix A).

3.8 ROW Findings

There are ROW deficits. These include steep running slopes, steep cross slopes, gaps, obstructions, missing curb ramps, and other barriers. The City does, on an annual basis, identify and fund construction activity in the Capital Improvement Program (CIP). The CIP activity includes roadway improvement projects and is an important complement to the ROW Transition Plan. These CIP projects are in effect new construction, and as required by title II 35.151, must be accessible.

CITY OF CHANDLER 2020 TRANSITION PLAN

The purpose of this portion of the report is to describe in general terms the Transition Plan recommendations, discuss the influence of community and staff feedback, identify the City official responsible for implementation of the Transition Plan, review the way in which the 2020 work blended the 2016 Partial Transition Plan, review GIS protocols, introduce the Parks and Facilities portion of the Transition Plan, discuss costing methodology for parks and facilities, introduce the PROW schedule, and lastly, discuss costing methodology for PROW assets.

The Transition Plan implements the ADA mandates and is a critical portion of this report.

4.1 Community Engagement Influences

As discussed earlier in section 2.4, the City wisely chose a robust approach to community engagement. Four sessions were conducted, with facilitators seeking the access preferences and priorities of citizens. Items of consensus were to make unique sites, such as City Hall, a high priority, but to also address the basics at other sites, such as parking, accessible routes, entries, and restrooms. More than one participant said that it is useless to have an accessible element in a park or facility if the parking is not accessible or the restrooms are not accessible.

Community engagement also had an influence on the PROW retrofit order. Although there is less flexibility here because the US DOJ has laid out a priority, it was clear that PROW assets serving important municipal and school facilities, as well as the important downtown area, should be a high priority. Finally, community engagement also suggested a focus on City sites with the highest use, and that has been incorporated into the Transition Plan. See Appendix B.

4.2 City of Chandler Staff Feedback

City staff was also invited to comment on the order of retrofit. Several items were important to staff. One was blending retrofits with the City CIP. A second was having a relatively predictable budget amount annually. A third was balancing park and facility retrofits with PROW retrofits. Staff also reviewed retrofit factors often considered by other cities, and provided feedback.

4.3 The Program Access Test

Critical to the Transition Plan is the program access test, discussed in virtually every chapter of this report. There may come a time in the future when more clear guidance is provided from the federal government as to what should be retrofit when. In the interim, the City of Chandler is urged to retrofit unique sites, one-of-three recurring sites, and PROW as described by the US DOJ title II regulation at 35.150(d)(2). Dispersion is critical to the order of retrofit as well. (See section 1.4 above for more detail.)

4.4 Efficiency: Blending Retrofits with CIP Activity

Mentioned above in 3.8 and 4.2, the importance of blending Transition Plan work with other City plans cannot be overstated. The Transition Plan is a tool. Consider parking lot replacement plans, playground replacement schedules, facility maintenance and renovation efforts, master plans, strategic plans, and tweak the Transition Plan accordingly. All these plans involved

hundreds if not thousands of hours of human resources. Optimize City of Chandler resources by matching the Transition Plan retrofits to the tasks in other plans.

4.5 Responsible City Official

ADA title II is clear. The City of Chandler Transition Plan must name a City official responsible for implementation. In developing the 2020 Transition Plan, the responsible City official, also referred to as the ADA Coordinator, has changed. That person will likely change between now and 2040, the last year in the retrofit schedule. On every online presence, on every print piece, the ADA Coordinator should be clearly listed. As the 2020 Transition Plan is completed, the responsible City official is as listed below:

Jason Crampton
ADA Coordinator/Transportation Planning Supervisor
City of Chandler
175 S. Arizona Avenue, 4th Floor, City Hall
480-782-3440
email: ada.coordinator@chandleraz.org

4.6 Blending the 2016 and 2020 Work

The 2020 Transition Plan blends the 2016 and 2020 approaches with respect to the park and facility barrier removal plan identified in section 5 of the 2016 Transition Plan. Section 3 of the 2016 Plan, titled Self-Evaluation of Programs, Policies, Services, and Activities remains in effect and is not replaced by this 2020 plan.

The 2016 Partial Transition Plan park and facility barrier removal plan applied a priority approach that described retrofits as a high priority, medium priority, or low priority. Within each of those three categories were three other categories. City access deficits were rated as a High 1, 2, or 3 priority, Medium 4, 5, or 6 priority, or Low 7, 8 or 9 priority. This three-stage approach is similar to the 2020 work, where retrofits were initially described as Phase One, Two, or Three. Adapting the schedule format of the 2016 Partial Transition Plan, the 2020 Transition Plan spreads work out through 2040. The 2020 Transition Plan accepts the priorities of the 2016 work product. The 2020 Plan also uses the 2016 language for those sites audited in 2014 and 2015.

Regarding PROW, this 2020 Transition Plan replaces the Public Right-of-way Assessment and Mitigation for ADA Barriers portion of the 2016 ADA Transition Plan. The 2016 Partial Transition Plan does not strictly adhere to the US DOJ requirements. This 2020 Transition Plan does not revise that earlier work, but does incorporate it here in a unified approach. It is clearly recognized by US DOJ that not all access deficits can be retrofit at once. Viewing all work completed and to be completed by the City, retrofits began in 2016 and stretch through 2030.

The Transition Plan blends all city sites in alphabetical order.

4.7 Parks and Facilities GIS Shapefile

The City received a shapefile with GIS data for all sites. Where deficits were found, images were captured using a GPS enable camera. Two images were taken, one close to show the

measurement, and one farther away for context in locating the deficit. The shapefile was based on earlier samples provided to the City, and accepted by the GIS Program Manager.

Once uploaded, staff used geojot to reposition the image and retag it, if necessary, for accuracy. The tagged images were then referenced in an Excel document and sent to our GIS expert. From that data set, shape files were created that have several layers of information that can be extracted – cost, year of work, type of correction, etc. The final file was then sent to City of Chandler staff for use in the City GIS program.

4.8 Parks and Facilities Retrofit Schedule

As noted earlier, parks and facilities retrofits are implemented through 2040. It is recommended that the City advance this schedule when possible. The US DOJ is clear that retrofits should be completed as soon as is possible. The Transition Plan is an Excel spreadsheet and is to be used in conjunction with the site reports discussed in Section 3.3 of this report,

The City, and all other cities across the United States, are facing budget shortfalls for the next several years due to the Covid-19 pandemic. It is important that any reductions in work regarding retrofits be at the same amount as any other reductions. In other words, if all City departments are cut by 12.5% in 2021 or 2022, access work cannot be cut by a greater amount. See [West Palm Beach](#) for guidance on this budgetary concept.

The clear message in that Federal District Court decision is that the “extreme disparity” in funding cuts regarding services for people with disabilities amounts to discrimination on the basis of disability. The City is cautioned against making cuts in Transition Plan activity that are significantly greater than cuts in other areas.

As noted earlier, work is recommended through 2040. We have created a category titled City Option. Deficits in City Option need not, in our opinion, be removed because doing so may be technically infeasible or unnecessary because of the program access test. Should work be planned for a site in the City Option list, such as an alteration or addition, making retrofits to the identified deficits would be required.

The Transition Plan is arranged on 11’ x 17’ paper. As such, it is best viewed digitally. The Transition Plan has two tabs. The first tab is a detailed list of retrofits, with costs, scheduled by year and by site. The second is a pivot table that provides a more general review by year, with brief descriptions of work to occur at each park or facility.

The Transition Plan shows activity that occurred in FY 16, FY 17, FY 18, FY 19, and FY 20. This is work that was recommended in the 2016 Partial Transition Plan. To demonstrate the continued implementation of retrofits, we retained those projects, and the work in those fiscal years is shaded to differentiate it from future work. See the Transition Plan in Appendix F.

4.9 Parks and Facilities Costs and Costing Methodology

The 2020 Transition Plan includes cost references for planning purpose. These are not an engineer’s cost estimate as there is no design solution at this time. These were built with a reliance on R. S. Means costs for accessibility retrofits. This is a valuable resource but it has not been revised since 2004. Therefore, the costs were adjusted upwards by 60% to reflect the increased cost in construction since 2004.

After consulting with City staffs, we have also added a 3% annual multiplier to reflect ongoing cost increases. We recognize that many factors affect the final cost of a project, such as the final design, workload, relationship with the vendor, the year in which the work will occur, and projects by other jurisdictions in the Valley.

The total projected cost for all park and facility projects is \$10,255,074.48, an average of \$512,753.72 for 20 years (2021 through 2040). This includes smart practices and program access elements (City Option) that we believe need not be retrofit at this time.

The highest prior year is FY 20 at \$725,210.00, and the lowest prior year is FY 16 at \$76,330.00. The highest coming year is FY 27 at \$628,809.91 and the lowest coming year is FY 22 at \$253,313.12. All past and coming projected costs appear in the table below. For retrofit detail, see the Transition Plan and the site reports.

FY 16	\$ 76,330.00	FY 17	\$ 375,276.00	FY 18	\$ 138,062.00
FY 19	\$ 405,399.00	FY 20	\$ 725,210.00	FY 21	\$ 314,297.14
FY 22	\$ 253,313.12	FY 23	\$ 455,097.01	FY 24	\$ 444,672.77
FY 25	\$ 351,229.97	FY 26	\$ 529,317.92	FY 27	\$ 628,809.91
FY 28	\$ 398,379.75	FY 29	\$ 428,867.69	FY 30	\$ 411,670.42
FY 31	\$ 379,265.84	FY 32	\$ 463,921.21	FY 33	\$ 307,801.81
FY 34	\$ 521,578.75	FY 35	\$ 578,405.82	FY 36	\$ 622,203.37
FY 37	\$ 529,743.90	FY 38	\$ 333,361.59	FY 39	\$ 391,671.73
FY 40	\$ 473,923.18				

City Option deficits have a projected retrofit cost of \$1,030,702.05. Retrofits in City Option may be due to technical infeasibility, the program access test, construction tolerance, or equivalent facilitation. See 4.8 for more information.

4.10 Public Right-of-Way Retrofit Schedule

The attached ROW Transition Plan spreads retrofit work for severe deficits over a 20-year period, consistent with the approach of parks and facilities. The retrofit work is exclusive of all other roadway projects. ROW assets were separated into three categories. Assets with the greatest degree of noncompliance are in Category 1. Assets with a moderate degree of noncompliance are in Category 2. These two categories should be retrofit. Assets that are mildly noncompliant and can be cured with maintenance are in Category 3, and this Category is not the subject of the Transition Plan. See the ROW Transition Plan (Appendix A) for detail.

4.11 Public Right-of-Way Costs and Costing Methodology

The 2020 ROW Transition Plan for all FMA pedestrian infrastructure totals \$36,800,000. This does not include the cost of inflation. The City has in the past set aside \$3,000,000 annually for retrofits. If this continues, it is adequate to address the deficits in a reasonable period of time.

The City can choose to address the ROW assets that are most severely noncompliant. The ROW Transition Plan addresses that issue on pages 11 and 12. See the ROW Transition Plan (Appendix A) for more detail.

ACCESS AND INCLUSION SOLUTIONS PROCESS

Recognizing that public entities will, from time to time, become involved in a dispute about accessibility or inclusion, the title II regulation requires cities with 50 or more employees to have a “grievance” process. The intent of the process is to resolve disputes promptly and effectively.

Complaint procedure. A public entity that employs 50 or more persons shall adopt and publish grievance procedures providing for prompt and equitable resolution of complaints alleging any action that would be prohibited by this part.

The City is urged to make this a more user-friendly process, starting with the name of the process. Referring to this as a grievance implies an adversarial relationship between the City of Chandler and its citizens. This is both untrue and unnecessary.

It is suggested that the City assure that all employees know of this process. As an aid to planning and forecasting, and as a risk management tool, the City of Chandler is urged to keep all disputes and solutions, for every City department, in one central location. This allows solutions in 2021 to inform solutions that may be necessary in 2025 (see Appendix D).

PROGRAM AND POLICY REPORT

The scope of work for the 2016 Partial Transition Plan included a survey of City of Chandler staffs regarding policies, processes, and programs made available to the public. The resulting report made many specific recommendations to the City.

We have significant experience with programs and policies, and in the time since the 2016 Partial Transition Plan, many settlement agreements and court decisions have offered a new interpretation of the title II requirements in section 35.130, which in a lengthy way addresses policies and programs. We developed a separate program and policy report for the City of Chandler, and it is attached in the Appendix (see Appendix C).

FUNDING ACCESS RETROFITS

Funding Transition Plan retrofits is a critical part of the strategy the City of Chandler must develop. We do note that in recent years the City budgeted at least \$3,000,000 for ROW retrofits annually, and \$500,000 annually for park and facility retrofits.

In this portion of the report, we discuss some of the potential funding sources other cities, counties, park districts, and governmental entities have used for accessibility compliance. This is intended as primer on this topic and is not intended as a comprehensive list.

No Dedicated Federal Source

There is no dedicated source of federal funds for accessibility renovations to existing sites. This will not likely change in the future. Federal funding is unpredictable.

Earmarks

Some of our clients have pursued Congressional earmarks for access work. Earmarks are unpopular, and difficult to obtain. While Congressional earmarks are not in use today, the current Administration has revived discussions regarding the use of earmarks. We would suggest that this is a viable option in communities of influence such as Chandler.

Community Development Block Grant Funds

Many cities have used federal Community Development Block Grant (CDBG) funds for accessibility renovations at existing sites. CDBG funds often have a scale of priority. It is important to establish accessibility as a priority for CDBG applications.

State Grants Programs

Several states, and many cities, have successfully pursued state legislation to set aside dedicated state funds that can be used for specific purposes, including access retrofits. To name a few, Illinois, New Jersey, Colorado, Ohio, Florida, and Texas all have sources of revenue funded in various ways, such as a real estate transfer tax. While the various states have all at times not fully funded these grant programs, they remain an effective tool for cities regarding access retrofits, site acquisition, and site development.

State Discretionary Funds

Most state legislatures provide some type of discretionary funding for members of the legislature. In some states, these are relatively small grants of under \$50,000. In other states, it is common to see legislative appropriations up to \$500,000. Most, however, are for smaller amounts.

Special Accessibility Legislation

In Illinois, legislation was adopted that allows cities and special purpose park districts to levy a property tax that can be used only for recreation for people with disabilities. The funds can be

used for access retrofits at existing sites and facilities. Statewide, local entities in Illinois levy an estimated \$35,000,000 annually for this purpose.

Private Giving

Many cities have successfully sought private gifts for accessibility purposes. The private giving area is subject to fluctuations depending on the economy, political issues, and related fiscal impacts. In our experience, private giving works best when an agency has an employee dedicated to this purpose.

The City should consider creation of such a position, and charge that person with the establishment and maintenance of relationships that encourage private giving, as well as corporate giving and solicitation of community foundations and other foundations.

Corporate Giving

Many cities have successfully sought grants from corporations. These may, for corporate purposes, come from marketing (such as naming rights to a facility) or from community giving. Also, many corporations have a related foundation that manages corporate giving.

In our experience, corporate giving works best when an agency has an employee dedicated to this purpose. See the recommendation above regarding private giving.

Community Foundations and Other Foundations

Community foundations, which operate on a regional basis, have also been involved in accessibility giving. Perhaps the greatest example here is the multi-million dollar Kellogg Foundation project that improved accessibility in Michigan, Ohio, Indiana, Illinois, and other states that bordered the Kellogg headquarters in Michigan.

In our experience, working with community foundations succeeds when an agency has an employee dedicated to this purpose. See the recommendation above regarding private giving.

City of Chandler General Fund and Bonding Authority

Many cities have reported on the Transition Plan needs to their residents, and successfully passed referenda. Many cities have also sourced retrofit dollars out of existing General Fund capabilities.

Other Methods

There are many other methods, some of which are crafted by a community to meet a unique set of circumstances. These include:

- A New Jersey community takes 100% of accessible parking fines and applies those towards recreation for people with disabilities.
- Several Illinois park districts have added a \$1 to \$10 surcharge to every registration, with the fees generated being earmarked for access and inclusion expenses.

Risk Management

Investing in safety saves money by avoiding legal expenses related to injuries on City properties. The same concept applies here. Investing in retrofits saves City of Chandler the cost of staff time and attorneys to defend against ADA lawsuits or administrative complaints.

While we do not believe a decision about access should hinge solely on risk management factors, we do recommend that City of Chandler be aware of this factor going forward. ADA enforcement continues to grow and touch more and more communities. Relief under the ADA is intended to be injunctive in nature, but the time consumed and cost of litigation can be a great drain on human and fiscal resources.

Right of Way Funding

There are several sources of ROW funding for the City of Chandler. These include MAG dollars (Maricopa Association of Governments), City bonds, ADOT Highway User Revenue Funds, the Federal Transit Authority funds, and as mentioned above, Community Development Block Grants.

IMPLEMENTATION STRATEGIES

Title II of the ADA is relatively straightforward. That said, the eight steps below have been used by many cities to simplify the approach to compliance.

1. ***Maintain a strong relationship with disability advisory groups.*** Make it a point to continue to seek out and work with these groups, and seek their feedback on future initiatives.
2. ***Acquire and maintain the Certified ADA Coordinator credential.*** There is no nationwide credential required for ADA implementation. However, a Certified ADA Coordinator will benefit the City, keeping it current on implementation strategies and smart practices from school districts, special purpose districts, counties, and cities throughout the United States. The City does have several staff with this credential and it is important to maintain this credential with continuing education.
3. ***Identify available sign language interpreters and enter into agreements*** before situations arise where the City needs such services. Negotiate rates, availability, environments where the work will occur, and so forth.
4. One of the title II requirements for communications produced by the City requires the City to ***respond to inquiries in the form in which the inquiry is made.*** We also believe that this is the courteous way to respond. Here, if an inquiry to the City comes in the form of a Braille document, the response from the City should also be in Braille.

We recommend the City either locate the nearest Braille printer and enter into an arrangement for use, or simply acquire one and have employees learn how to use it. For a review of this topic by the American Foundation for the Blind, visit [this site](#).

5. ***Acquire assistive listening systems.*** There are three principal types: inductive loop systems, infrared systems, and FM systems. These devices are helpful for persons with some residual hearing. These devices separate speech from ambient noise and amplify speech. People who are deaf or hard of hearing may prefer, for various reasons, one type of device. The National Association of the Deaf has a brief review of the topic [here](#).
6. ***Monitor the development of the website accessibility requirements.*** The Department of Justice suspended the website accessibility guideline in 2016 because technology had advanced so much that the old guideline, developed in 2011, was obsolete. The plan was that the Department of Justice would reevaluate the guidance and issue a final and enforceable Standard in 2018.

That will not happen, today. A 2017 Presidential directive requires that for every new regulation issued, the issuing agency must rescind two. This has caused significant turmoil in the world of accessibility, where there are only three regulations (title II, title III, and the 2010 Standards). To rescind one of the three would have disastrous consequences for Chandler residents with disabilities. We believe it likely that no new accessibility standards will be issued in the immediate future.

In the interim, assure that the City website is compliant with the Website Content Accessibility Guidelines (WCAG). This guideline was developed by the industry and is the tool to use to assure that persons with disabilities can view and understand the City website.

7. ***Develop an ongoing series of disability training for employees.*** Every day, new products appear on the market, agencies issue new enforcement decisions, and cities develop and perfect new strategies for inclusion and access. Keep current on these developments and share this news with City staffs.
8. ***Require employees to add access and inclusion subject matter to their “diet” of continuing education.*** It is important to seek out and attend training events that relate to the work of the employee, and focus on access and inclusion.

CONCLUSION

Including people with disabilities is a process. Making certain that the infrastructure of the City of Chandler is indeed accessible to and usable by people with disabilities requires a civic commitment to access.

Access does require both human and fiscal resources. As Chandler residents age, the incidence of disability rises. Accessibility projects, whether at Pima Park or Arizona Avenue, are important today and even more important in the future. City priorities can and should change to meet an evolving set of circumstances. However, those priorities should always include a visible commitment to making City assets, programs, and policies accessible to and usable by people with disabilities. Doing more, not less, in regard to accessibility, is always the right thing to do.



Prepared and Submitted by:

**John N. McGovern, JD
Partner, Principal-in-Charge
WT Group, LLC Accessibility Practice**



Engineering • Design • Consulting

CITY OF CHANDLER, ARIZONA

TRANSITION PLAN

APPENDICES

Appendix A: Public Right-of-Way (ROW) Transition Plan Report

Appendix B: Public Feedback Report

Appendix C: Program and Policy Report

Appendix D: Access and Inclusion Solutions Process

Appendix E: Sample Service Animal Policy

Appendix F: Parks and Facilities Transition Plan Summary



APPENDIX A: PUBLIC RIGHT-OF-WAY (ROW) TRANSITION PLAN REPORT



**City of Chandler
Public Right-Of-Way
Americans with Disabilities Act Transition Plan Report**

Prepared for:

**The City of Chandler
Transportation & Development Capital Projects
215 East Buffalo Street
Chandler, Arizona 85225**

Prepared by:

**Wood Environment & Infrastructure Solutions, Inc.
4600 E. Washington St. Suite 600
Phoenix, Arizona 85034**

Project No.: 37-2018-5000

November 2020

TABLE OF CONTENTS

	Page
1.0 INTRODUCTION.....	3
2.0 SELF-EVALUATION	4
2.1 Data Collection	4
2.2 Extraction.....	6
2.3 Analysis	7
2.4 Barriers.....	10
3.0 CORRECTION PROGRAM.....	10
3.1 Prioritization Criteria.....	10
3.2 Prioritization	10
4.0 UNATTAINABLE IMPROVEMENTS.....	10
5.0 IMPLEMENTATION COST AND SCHEDULE	11
5.1 Cost.....	11
5.2 Schedule.....	12
5.3 Other Improvement Programs.....	12
6.0 PROGRAM RESPONSIBILITY.....	12
7.0 CURB RAMP CORRECTION PROGRAM.....	13

LIST OF TABLES

Table 1 – Impedance Scoring Table

Table 2 – Activity Scoring Table

LIST OF FIGURES

Figure 1 – City FMA/Grid Index

Figure 2 – Mobile LIDAR Scanning Vehicle

Figure 3 – LIDAR Scanning Point Cloud Example

Figure 4 – Observed Accessibility Assets Example

LIST OF APPENDICES

Appendix 1 – Accessibility Asset Grid Index

Appendix 2 – Accessibility Asset Compliance Categories

Appendix 3 – Priority Index Scoring Heat Map

Appendix 4 – Improvement Costs

1.0 INTRODUCTION

The Americans with Disabilities Act (ADA) of 1990 (42 USC 12101) is a civil rights statute (hereinafter referred to as the Act) that prohibits discrimination against people who have disabilities. There are five separate Titles (sections) of the Act relating to different aspects of potential discrimination. Title II of the Act applies to more than 89,000 units of state and local governments, such as the City of Chandler (City). In subtitle A of Title II, the city is prohibited from discriminating on the basis of disability in programs, services, activities, policies, and the built environment. In subtitle B of Title II, the city is prohibited from discrimination in the provision of demand-responsive or fixed route transportation systems. With the advent of the Act, designing and constructing facilities for public use that are not accessible by people with disabilities constitutes discrimination.

The Act applies to all facilities, including both facilities built before and after 1990. It is important to note that a groundswell of court decisions have determined that pedestrian infrastructure, including sidewalks, curb ramps, and more, are subject to Title II requirements and are indeed a program of a city. The leading case here is *Barden v. Sacramento*. Title II requires the city to make “programs” accessible to and usable by people with disabilities. This is known as the so-called “program access test.” As a necessary step to provide accessibility under the ADA, state and local government, public entities, or agencies are required to perform self-evaluations of their current facilities, relative to the accessibility requirements of the ADA. The agencies are then required to develop a Transition Plan to address any deficiencies.

The Transition Plan is intended to achieve the following:

- Identify physical obstacles that limit the accessibility of facilities to individuals with disabilities.
- Describe the methods to be used to make the facilities accessible.
- Provide a schedule for making the access modifications; and
- Identify the public officials responsible for implementation of the Transition Plan.

In December 2015, the city completed a comprehensive update of the city's existing ADA Transition Plan, as well as the completion of a Self-Evaluation of all city programs to ensure the city's programs and facilities are in compliance with the federal ADA law. Further updates to the plan were also completed in December of 2016. The plan is based on the *National Cooperative Highway Research Program, ADA Transition Plans: A Guide to Best Management Practices*, May 2009.

The following plan includes self-evaluation, correction program, program responsibility, and curb ramp correction program. The limits of the project include all city-owned streets within the city as shown in Figure 1.

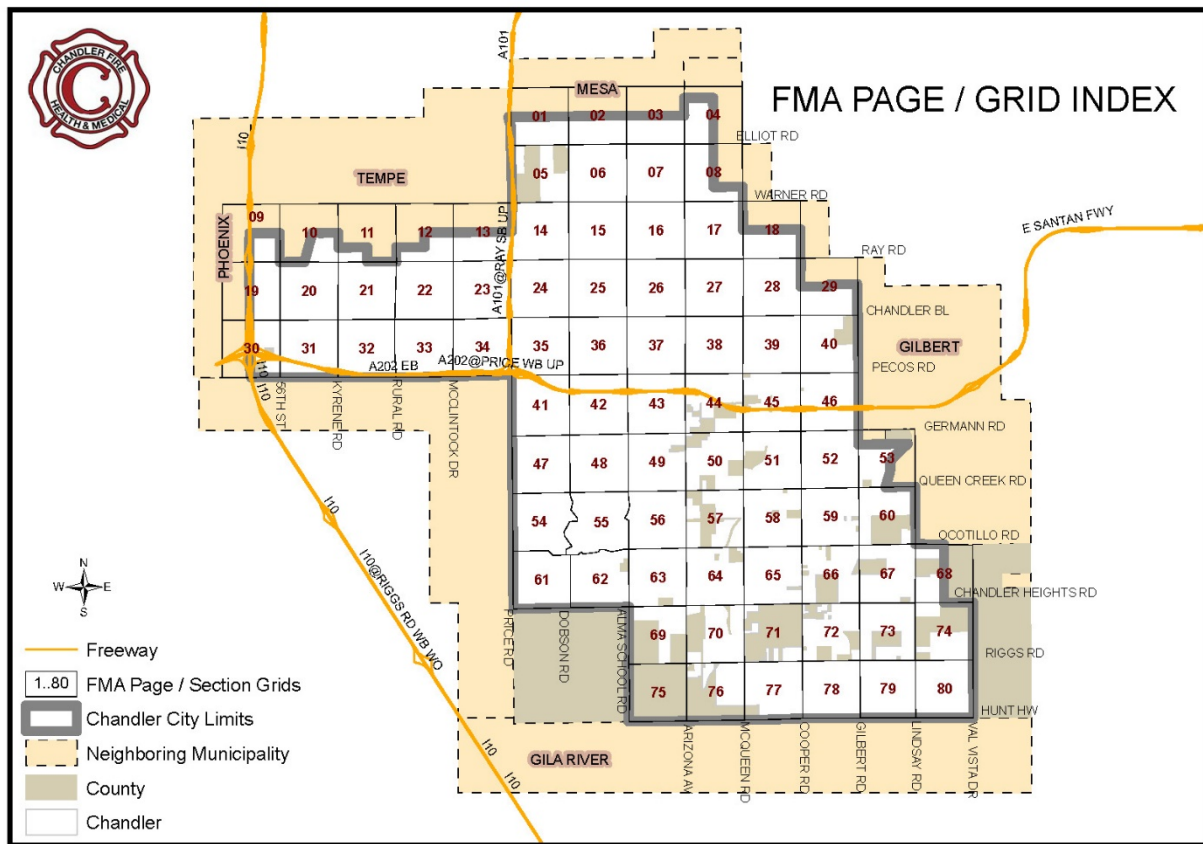


Figure 1
FMA/GRID INDEX

2.0 SELF-EVALUATION

2.1 Data Collection

In order to determine access deficiencies and barriers within the city's ROW, existing geometric information needed to be collected for sidewalk, ramps, and driveways. The data was collected using a mobile mapping (LiDAR) scanning vehicle (see Figures 2 and 3) which collects a point data cloud of the environment with a high resolution 360-degree camera taking continuous photographs along the ROW. Roadways were driven in both directions, to ensure complete coverage of the ROW and adjacent properties. LiDAR and imagery were collected in both directions of travel, approximately 616 centerline miles (1,232 miles both ways) for all city arterials, collectors, and local streets. Following the collection, data was post processed with the georeferenced imagery. Overall, the data collected included:

- Sidewalks – ~ 650 miles
- Driveways – ~ 10,629
- Curb Ramps – ~ 13,778

The data was collected for each of the 80 FMA/Section Grids within the city limits and is shown on maps in Appendix A.



Figure 2
Mobile Mapping (LiDAR) Scanning Vehicle

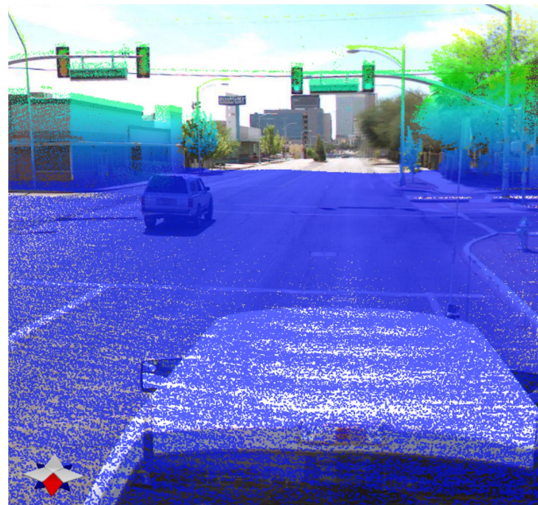


Figure 3
Point Data Cloud

2.2 Extraction

The data was extracted using semi-automated data extraction software. This allowed for initial automated creation of most sidewalk features, as well as identification of primary curb and ramp locations. Following the automated extraction, desktop assessments were conducted to identify and locate all of accessibility assets within the ROW. These assessments were conducted using the photo imagery and locating all the accessibility assets. The photographic images were then draped on top of the LiDAR point cloud data allowing for accurate measurements and the digital creation of all observed accessibility assets, as seen in Figure 4. Point, line and polygon features were created to correspond with the various geometries of accessibility assets from access ramp flares. A complete array of shapes for each of the accessibility assets was developed as specified by the city including these assets:

- Sidewalk – as polygons
- Depressed Curb Driveways – as polygons
- Access Ramps – as polygons

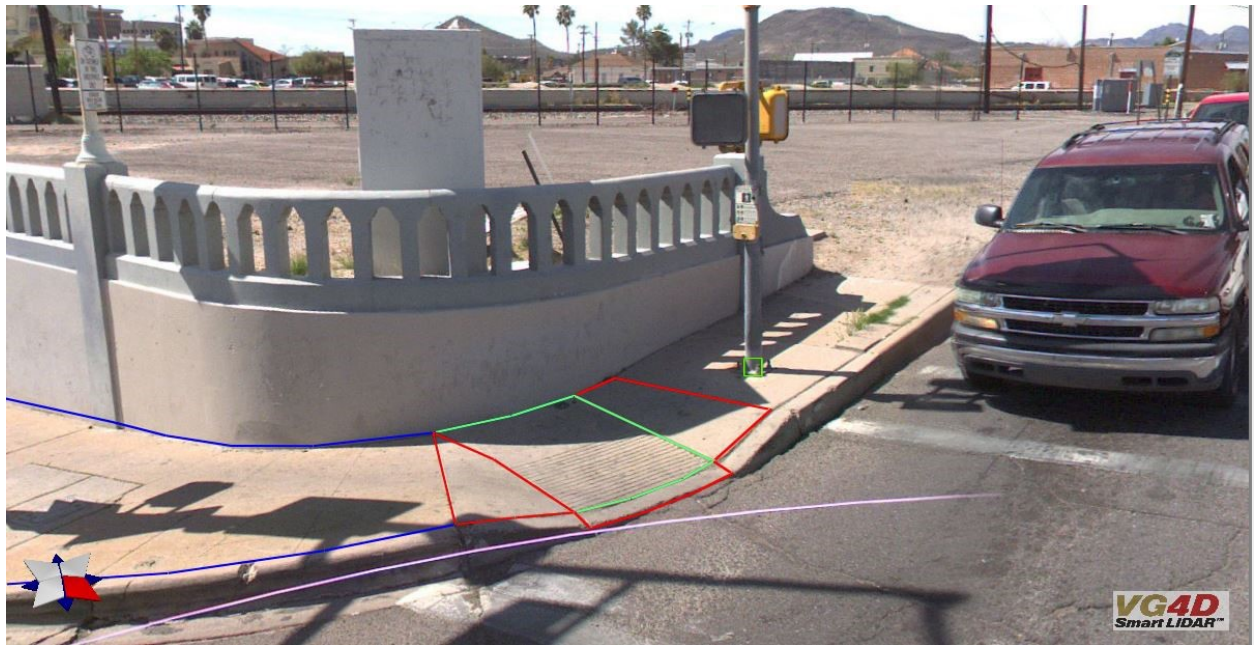


Figure 4
Observed Accessibility Assets

2.3 Analysis

The existing accessibility assets were analyzed for compliance based on the Public Rights-of-Way Accessibility Guidelines commonly called PROWAG issued by the United States Access Board. The Access Board is responsible for developing accessibility guidelines for the design, construction, and alteration of facilities to ensure that they are readily accessible to and usable by individuals with disabilities. The PROWAG document is available at: <https://www.access-board.gov/guidelines-and-standards/streets-sidewalks/public-rights-of-way/proposed-rights-of-way-guidelines>

Each accessibility asset was evaluated based on several attributes. For example, sidewalks were evaluated based on status (whether they exist or not), width, cross slope, running slope, road grade slope, material, raised crossing, flush to roadway, flush sidewalk barrier, failures, and gap in route.

Each attribute was analyzed based on existing geometric values and then a compliance category was assigned.

Table 1 – Impedance Scoring

IMPEDANCE SCORE

Sidewalk, Depressed-Curb Driveway, and curb Ramp impedance scores represent the greatest constraint on mobility in public rights-of-way. The impedance score calculations follow design guidance found in the ADA PROWAG Proposed Guidelines on dimensions and details for new construction and alterations.

The SUM of the impedance scores is out of 100 possible points!

A high impedance score highlights areas where the quality of existing pedestrian infrastructure is poor for usage by persons with disabilities.

Sidewalk and Depressed-Curb Driveway

(If there is **NO SIDEWALK PRESENT** (driveways are for vehicular access and are not always needed or present), it automatically receives a score of **100 POINTS**)

Running Slope

This impedance score category is determined by the slope, expressed in %, **IN the DIRECTION of TRAVEL**. This is a GIS **LINE** layer digitized from LIDAR survey.

Maximum Possible Score	Measurement	Score
25	12.50 ≥	25
	10.00 ≥ 12.50	15
	8.33 ≥ 10.00	10
	5.00 ≥ 8.33	5
	< 5.00	0

Cross Slope

This impedance score category is determined by the slope, expressed in %, **ACROSS the DIRECTION of TRAVEL**. This is a GIS **LINE** layer digitized from LIDAR survey.

Maximum Possible Score	Measurement	Score
25	8.00 ≥	25
	6.00 ≥ 8.00	15
	4.00 ≥ 6.00	10
	2.00 ≥ 4.00	5
	< 2.00	0

Panel Width

This impedance score category is determined by **ACCESSIBLE WIDTH**, expressed in **FEET**, around any potential **OBSTRUCTIONS**. This is a GIS **LINE** layer digitized from LIDAR survey.

Maximum Possible Score	Measurement	Score
25	< 3.00	25
	3.00 ≥ 4.00	10
	4.00 ≥	0

Changes in Level

This impedance score category is determined by **DEFECTS in PAVEMENT**, by classifying types of defects. This is a GIS **POINT** layer digitized from LIDAR survey.

Maximum Possible Score	Measurement	Score
25	Heaving (vertical change between panels)	25
	Gaps (horizontal change between panels)	15
	Cracks (physical defect within a panel)	10
	None	0

Ramp

(If there is **NO RAMP PRESENT**, it automatically receives a score of **100 POINTS**)

Ramp Panel Running Slope

This impedance score category is determined by the slope, expressed in %, **IN the DIRECTION of TRAVEL**. This is a GIS **LINE** layer digitized from LIDAR survey.

Maximum Possible Score	Measurement	Score
10	12.00 ≥	10
	8.33 ≥ 12.00	5
	< 8.33	0

Ramp Panel Width

This impedance score category is determined by **ACCESSIBLE WIDTH**, expressed in **FEET**, around any potential **OBSTRUCTIONS**. This is a GIS **LINE** layer digitized from LIDAR survey.

Maximum Possible Score	Measurement	Score
10	< 3.00	10
	3.00 ≥ 4.00	5
	4.00 ≥	0

Detectable Warning Surface

This impedance score category is determined by the presence of a **STANDARD DETECTABLE WARNING SURFACE** (if it spans the full width of the panel, and is of a truncated dome design).

Maximum Possible Score	Measurement	Score
10	Non-Standard	10
	Standard	0

Ramp Panel Flare Slope

This impedance score category is determined by the slope, expressed in %, of **EITHER FLARE PANEL**. This is a GIS **LINE** layer digitized from LIDAR survey.

Maximum Possible Score	Measurement	Score
10	12.00 ≥	10
	10.00 ≥ 12.00	5
	< 10.00	0

Gutter Lip

This impedance score category is determined by the presence of a **DEFECTS in the TRANSITION** between the roadway and ramp panel. This is a GIS **POINT** layer digitized from LIDAR survey.

Maximum Possible Score	Measurement	Score
5	Gutter Lip	5
	No Gutter Lip	0

Gutter Running Slope

This impedance score category is determined by the slope, expressed in %, **IN the DIRECTION of TRAVEL**. This is a GIS **LINE** layer digitized from LIDAR survey.

Maximum Possible Score	Measurement	Score
5	5.00 ≥	5
	< 5.00	0

Ramp Panel Cross Slope

This impedance score category is determined by the slope, expressed in %, **ACROSS the DIRECTION of TRAVEL**. This is a GIS **LINE** layer digitized from LIDAR survey.

Maximum Possible Score	Measurement	Score
10	7.00 ≥	10
	2.00 ≥ 7.00	5
	< 2.00	0

Landing Panel Width

This impedance score category is determined by **ACCESSIBLE WIDTH**, expressed in **FEET**, around any potential **OBSTRUCTIONS**. This is a GIS **LINE** layer digitized from LIDAR survey.

Maximum Possible Score	Measurement	Score
10	None	10
	0.00 ≥ 3.00	6
	3.00 ≥ 4.00	4
	4.00 ≥	0

Landing Panel Slope

This impedance score category is determined by the slope, expressed in %, **in ANY DIRECTION of TRAVEL**. This is a GIS **LINE** layer digitized from LIDAR survey.

Maximum Possible Score	Measurement	Score
10	2.00 ≥	10
	< 2.00	0

Curb Ramp Obstruction

This impedance score category is determined by the presence of an **OBSTRUCTION** on the ramp or landing panel. This is a GIS **POINT** layer digitized from LIDAR survey.

Maximum Possible Score	Measurement	Score
10	Obstruction	10
	No Obstruction	0

Alignment with Marked Crosswalk

This impedance score category is determined by the **ALIGNMENT of the RAMP with the CROSSWALK** (if the crosswalk exists, and if the curb ramp is within the crosswalk lines).

Maximum Possible Score	Measurement	Score
5	Not Aligned	5
	Aligned	0

Gutter Cross Slope

This impedance score category is determined by the slope, expressed in %, **ACROSS the DIRECTION of TRAVEL**. This is a GIS **LINE** layer digitized from LIDAR survey.

Maximum Possible Score	Measurement	Score
5	2.00 ≥	5
	< 2.00	0

Table 2 – Activity Scoring

ACTIVITY SCORE

Activity scores are based on the following SIX categories, which describe the likelihood of a disabled person's usage of an area's pedestrian facilities.

The SUM of the activity scores is out of 100 possible points!

A high activity score highlights areas where pedestrian activity is likely to be greatest, especially for persons with disabilities.

Priority I

The highest priority for retrofit are walkways serving public entities. This includes city, county, and state government offices and facilities, public schools, public libraries, publicly owned community centers and social services, public pools, and public transit stops.

This activity score category is determined by the proximity, expressed in **LINEAR FEET**, to **PRIORITY I** locations. This is a GIS **POINT** layer as provided by the City of Chandler and the Maricopa Association of Governments.

Maximum Possible Score	Proximity	Score
27.5	≤ 500	27.5
	500 ≤ 1500	20
	1500 ≤ 2640	10
	2640 >	0

Priority II

The next highest priority for retrofit are walkways serving publicly and privately owned hospitals, doctor's offices, and health clinics.

This activity score category is determined by the proximity, expressed in **LINEAR FEET**, to **PRIORITY II** locations. This is a GIS **POINT** layer as provided by the City of Chandler and the Maricopa Association of Governments.

Maximum Possible Score	Proximity	Score
22.5	≤ 500	22.5
	500 ≤ 1500	15
	1500 ≤ 2640	10
	2640 >	0

Priority III

The third highest priority for retrofit are walkways serving retail and major employment sites. Major employment sites are defined as having 100 or more employees.

This activity score category is determined by the proximity, expressed in **LINEAR FEET**, to **PRIORITY III** locations. This is a GIS **POINT** layer as provided by the Maricopa Association of Governments.

Maximum Possible Score	Proximity	Score
20	≤ 500	20
	500 ≤ 1500	14
	1500 ≤ 2640	8
	2640 >	0

Priority IV

The next highest priority for retrofit are walkways serving 501(c)(3) nonprofit establishments, which includes privately owned schools.

This activity score category is determined by the proximity, expressed in **LINEAR FEET**, to **PRIORITY IV** locations. This is a GIS **POINT** layer as provided by the City of Chandler.

Maximum Possible Score	Proximity	Score
15	≤ 500	15
	500 ≤ 1500	11
	1500 ≤ 2640	6
	2640 >	0

Priority V

The fifth highest priority for retrofit are walkways serving senior housing facilities. The City is committed to removing barriers for those who are aging. Full access provides a welcoming atmosphere for seasonal residents and those living with ongoing disabilities.

This activity score category is determined by the proximity, expressed in **LINEAR FEET**, to **SENIOR** locations. This is a GIS **POINT** layer as provided by the Maricopa Association of Governments.

Maximum Possible Score	Proximity	Score
5	≤ 500	5
	500 ≤ 1500	3
	1500 ≤ 2640	1
	2640 >	0

Priority VI

The sixth highest priority for retrofit are high density housing block groups. Higher density communities with mixed land-use patterns tend to have higher levels of pedestrian activity.

This activity score category is determined by **HOUSING DENSITY**, indicated by **HOUSEHOLDS / ACRE**. This is a GIS **POLYGON** layer as provided by the US Census of 2010.

Maximum Possible Score	Indicator	Score
5	30 ≥	5
	10 ≥ 30	3
	5 ≥ 10	1
	0 ≥ 5	0

Priority VII

The last priority for retrofit are walkways that serve residential areas, as defined by proximity to streets which are categorized by traffic volume.

This activity score category is determined by the proximity of each asset to **STREET** locations, classified by traffic volumes. This is a GIS **LINE** layer as provided by the City of Chandler.

Maximum Possible Score	Proximity	Score
5	Local	5
	Collector	3
	Minor Arterial	2
	Major Arterial	1

A complete list of accessibility assets, attributes, values, and compliance categories are shown in Appendix B.

2.4 Barriers

Based on the analysis of the accessibility assets, barriers were identified with different levels of severity throughout the city.

3.0 CORRECTION PROGRAM

The 2010 Standards for Accessible Design, at section 104.1.1, permits construction and manufacturing tolerances. Dimensions are subject to existing conventional industry tolerances, but only "...where the requirement is stated as a range with specific minimum and maximum end points." The Standards, in advisory language at 104.1.1, note that "Conventional industry tolerances recognized by this provision include those for field conditions and those that may be a necessary consequence of a particular manufacturing process. Recognized tolerances are not intended to apply to design work."

3.1 Prioritization Criteria

The criteria for prioritizing the accessibility retrofits were developed through a series of meetings with city staff to determine the appropriate methodology. As a result, it was determined to score each asset based on two indices resulting in a total priority index. The two indices are the impedance of existing attributes and area activity with different weighting to comprise a total priority index from 1 to 200. See Tables 1 and 2.

The total priority index of each individual asset can be requested from the City of Chandler's ADA Coordinator listed on page 12.

3.2 Prioritization

The total priority index of individual assets was compiled and then groupings of assets with higher scores in proximity to each other to determine potential project prioritizations. A map showing varying scoring levels is included in Appendix C for each grid to show general priority levels.

4.0 Unattainable Improvements

Some elements of the public right of way along with specific elements on a case by case basis present unique challenges to accessibility. Current ADA guidelines do not allow for exceptions and the city is required to bring facilities into ADA compliance, however a lesser level of accessibility may be all that is feasible under a given situation. Each situation needs to be reviewed by city staff on a case by case basis. According to the ADOT "Americans with Disabilities Act: Final Transition Plan for Public Rights-of-Way Dated December of 2012, "Before reaching a conclusion about technical infeasibility, state and local governments need to consider the extent to which physical or site constraints can be addressed by alternative designs, improving the facility to the maximum extent feasible".

Each individual case should be reviewed for compliance and determined if compliance can be met. Only after a thorough review and determination that compliance cannot be met a decision should be made as to what improvements should be provided.

5.0 IMPLEMENTATION COST AND SCHEDULE

5.1 Cost

Based on the access deficiencies identified, costs for the upgrades have been calculated for each of the asset groups based on 2019 construction costs. Each asset group was divided into three categories. Those are:

- Category 1, which is noncompliant (severe/significant)
- Category 2, which is noncompliant (moderate/medium)
- Category 3, which is noncompliant (mild/minor)

We note that many of the deficits in Category 3 can be mitigated through proper maintenance by property owners or the city, and therefore those deficits are not included in our recommendations.

The total estimated retrofit cost for Category 1 is approximately \$11,550,000. The total estimated retrofit cost for Category 2 is approximately \$25,250,000. Detailed cost estimates are included in Appendix D.

Improvements can be made utilizing various funding sources including the MAG, city bonds, ADOT Highway User Revenue Funds, Federal Transit Authority, and Community Development Block Grants. The recent city funding available for ADA improvements has been approximately \$3,000,000 per year.

FMA 1-40

The north portion of the project FMA's 1-40 have been broken down into quarter sections within each FMA. Overall costs and the top 17 non-compliant quarter section costs can be found in Appendix D.

The 17 worst scoring quarter sections (Total score above 105) as ranked with the highest deficiencies would cost an estimated \$7.0 million. Based on the recent funding of \$3.0 million per year for ADA improvements most of these quarter sections could be completed in a little over 2 years. This does not take any inflation into account.

Based on this available funding, the implementation will be based on the prioritization as identified by this plan.

FMA 41-80 (Arterial and Collector Streets)

The south portion of the project FMA's 41-80 only collected information for arterial and collector roadways. The top 11 areas (roadways) of noncompliance were prioritized and broken out with costs and are also located in Appendix D.

The 11 worst scoring streets as ranked with the highest deficiencies would costs an estimated \$2.0 million. Based on the recent funding of \$3.0 million per year for ADA improvements most of these roadways could be completed in one year. This does not take any inflation into account.

These improvements listed only include ADA specific improvements and do not include any additional work to streets, utilities, or other items that may be impacted by ADA improvements.

5.2 Schedule

The city will make retrofit of severe and moderate PROW deficits the highest priority. These deficiencies will be addressed in conjunction with the city's asphalt surface repaving street rehabilitation work performed annually. Prior to performing an asphalt surface repaving project, all severe deficiencies will be retrofit, including all curb ramp and sidewalk panels integral to driveway entrances. Most moderate deficiencies will also be addressed prior to asphalt surface repaving projects, although staff will field verify moderate deficiencies before moving forward with retrofits of moderate deficiencies. Minor deficits will be field verified by city employees and retrofit as resources permit. Additionally, some major deficiencies will be addressed prior to scheduled asphalt surface repaving work as needed and in response to resident request. The implementation schedule for the accessibility retrofits will be year to year based on allocated funding.

5.3 Other Improvement Programs

Each year the city identifies projects to be listed, funded, approved, and constructed as part of the annual Capital Improvement Plan (CIP) Program. Roadway improvement projects listed in the current 2020-2029 program were identified and removed from the overall limits and quantities for this plan.

The city also identifies and improves roadways each year that are programmed for asphalt repaving. They complete approximately (55-60 lane miles) or (550,000 - 575,000 square yards) of Asphalt Repaving per year. This includes Arterials, Collectors, and Residential Roadway sections. ADA improvements are completed 6 months to 1 year prior to Asphalt Repaving of the identified roadways. Roadway projects that have been completed since the data collection for this project was completed in 2018 were identified by city staff and removed from the overall quantities and costs of this project.

6.0 PROGRAM RESPONSIBILITY

The city has an established ADA program within the Equal Opportunity Programs Division. The city is committed to ensuring that the terms and conditions mandated by the ADA are enforced within the city's level of authority and within its jurisdiction. As required by the USDOJ Title II regulation at 35.107, the city has issued an ADA Public Notice as shown in Appendix C which provides information about policies and filing of complaints. The program is administered by:

Jason Crampton
ADA Coordinator
480-782-3440

City of Chandler
175 S. Arizona Avenue
4th Floor, City Hall
email: ada.coordinator@chandleraz.gov

In addition, the city's website provides information and links for filing discrimination and accessibility complaints at:

<https://www.chandleraz.gov/accessibility-policy>

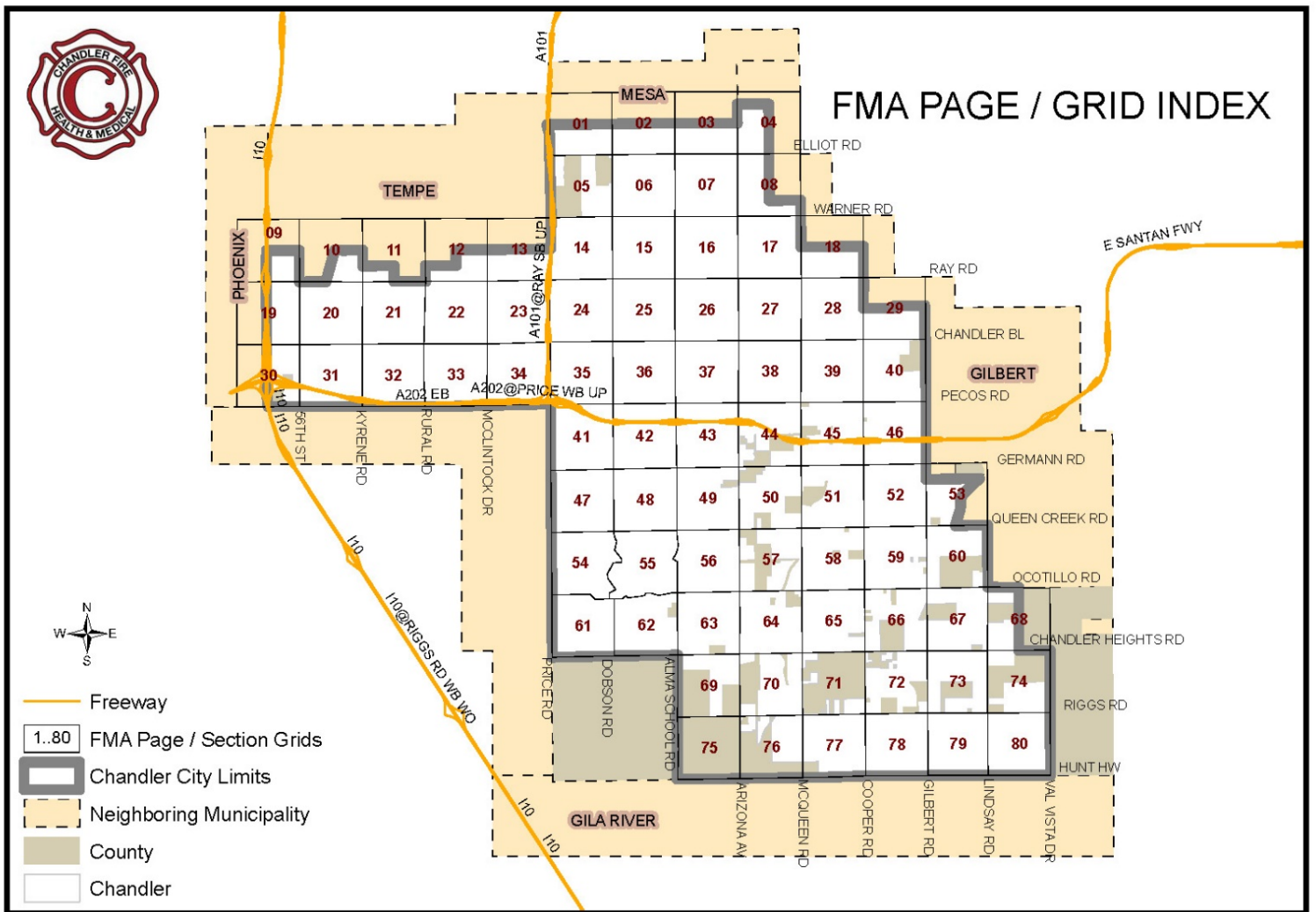
7.0 CURB RAMP CORRECTION PROGRAM

The curb ramp correction program is part of the overall implementation of the ADA retrofits as discussed previously.

FIGURES

APPENDIX 1

ACCESSIBILITY ASSET GRID INDEX



Map Prepared By Chandler Fire, Health & Medical Department

Source: COC Enterprise GIS Map Date: 01/2015
 .\MARS\FIRE_INDEX_REFERENCE_MAPS\05_FMA_PAGE_GRID_INDEX.mxd

The Chandler Fire, Health & Medical Department makes no warranties, written or implied, regarding the information on this map.

APPENDIX 2

ACCESSIBILITY ASSET COMPLIANCE CATEGORIES



Scoring method for Prioritization

For each type of asset (Ramp, Depressed-Curb Driveway, and Sidewalk), there were four separate counts:

- Impedance Score = 0
 - Impedance Score <= 30
 - Impedance Score <= 50
 - Impedance Score > 50
- (0 = Fully Compliant, 100 = Critical Failure)**

For Ramps and Sidewalks, there is an additional breakdown in the count for records where there is “No Ramp” and “No Sidewalk” (part of the data collection in the field was to identify spots where a Ramp or Sidewalk was expected to be but there wasn’t one).

Any “No Ramp” and “No Sidewalk” records got a score of 100/100.

They are not part of the total counts, since they aren’t existing assets but rather potentially needed assets, and thus are to be evaluated separately.

FMA 01-40 (All Roads)

Ramps (Each)

- Impedance Score = 0:	1,667	(11.17%)
- Impedance Score <= 30:	7,054	(73.85%)
- Impedance Score <= 50:	1,405	(14.71%)
- Impedance Score > 50:	26	(0.27%)
- Total:	9,552	
- No Ramp:	385	

Sidewalks (SF)

- Impedance Score = 0:	1,665,000	(10.11%)
- Impedance Score <= 30:	13,550,000	(82.23%)
- Impedance Score <= 50:	995,500	(6.05%)
- Impedance Score > 50:	250,250	(1.52%)
- Total:	16,465,750	
- No Sidewalk:	2,863,000	

Driveways (Each)

- Impedance Score = 0:	389	(4.27%)
- Impedance Score <= 30:	4,989	(54.79%)
- Impedance Score <= 50:	2,714	(29.80%)
- Impedance Score > 50:	1,014	(11.14%)
- Total:	9,106	



FMA's 41-80 (Only Arterial and Collector Roads, including Price Road)

Ramps (Each)

- Impedance Score = 0:	177	(7.77%)
- Impedance Score <= 30:	1,855	(81.47%)
- Impedance Score <= 50:	237	(10.41%)
- Impedance Score > 50:	8	(0.35%)
- Total:	2,277	
- No Ramp:	41	

Sidewalks (SF)

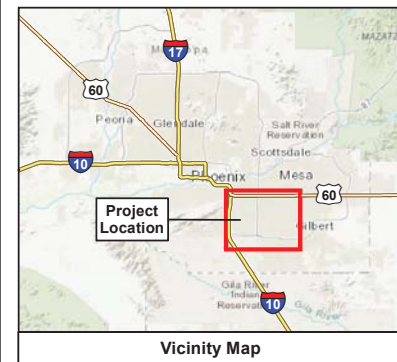
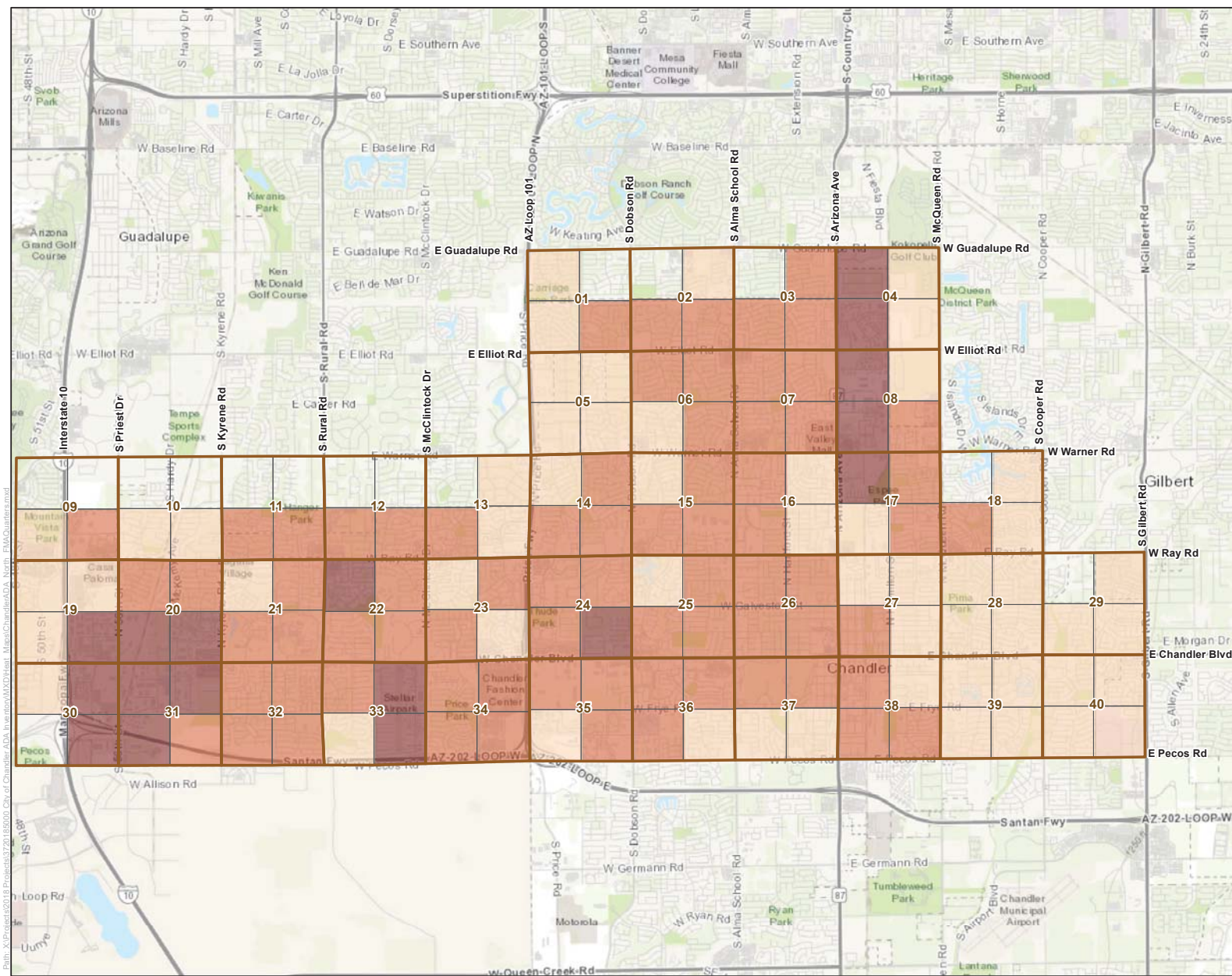
- Impedance Score = 0:	1,306,000	(42.94%)
- Impedance Score <= 30:	1,697,500	(55.81%)
- Impedance Score <= 50:	36,250	(1.19%)
- Impedance Score > 50:	1,750	(0.06%)
- Total:	3,041,500	
- No Sidewalk:	327,750	

Driveways (Each)

- Impedance Score = 0:	6	(2.16%)
- Impedance Score <= 30:	202	(72.66%)
- Impedance Score <= 50:	67	(24.10%)
- Impedance Score > 50:	3	(1.08%)
- Total:	278	

APPENDIX 3

PRIORITY INDEX SCORING HEAT MAP



Legend

- FMA Block Boundaries
- Quartered FMA Boundaries

Averaged Asset Total Score

No fill indicates no assets available

- Low (<75)
- Medium (75-105)
- High (>105)



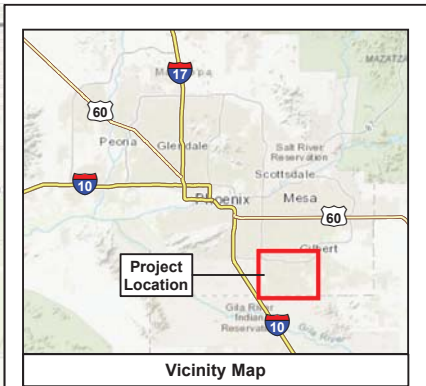
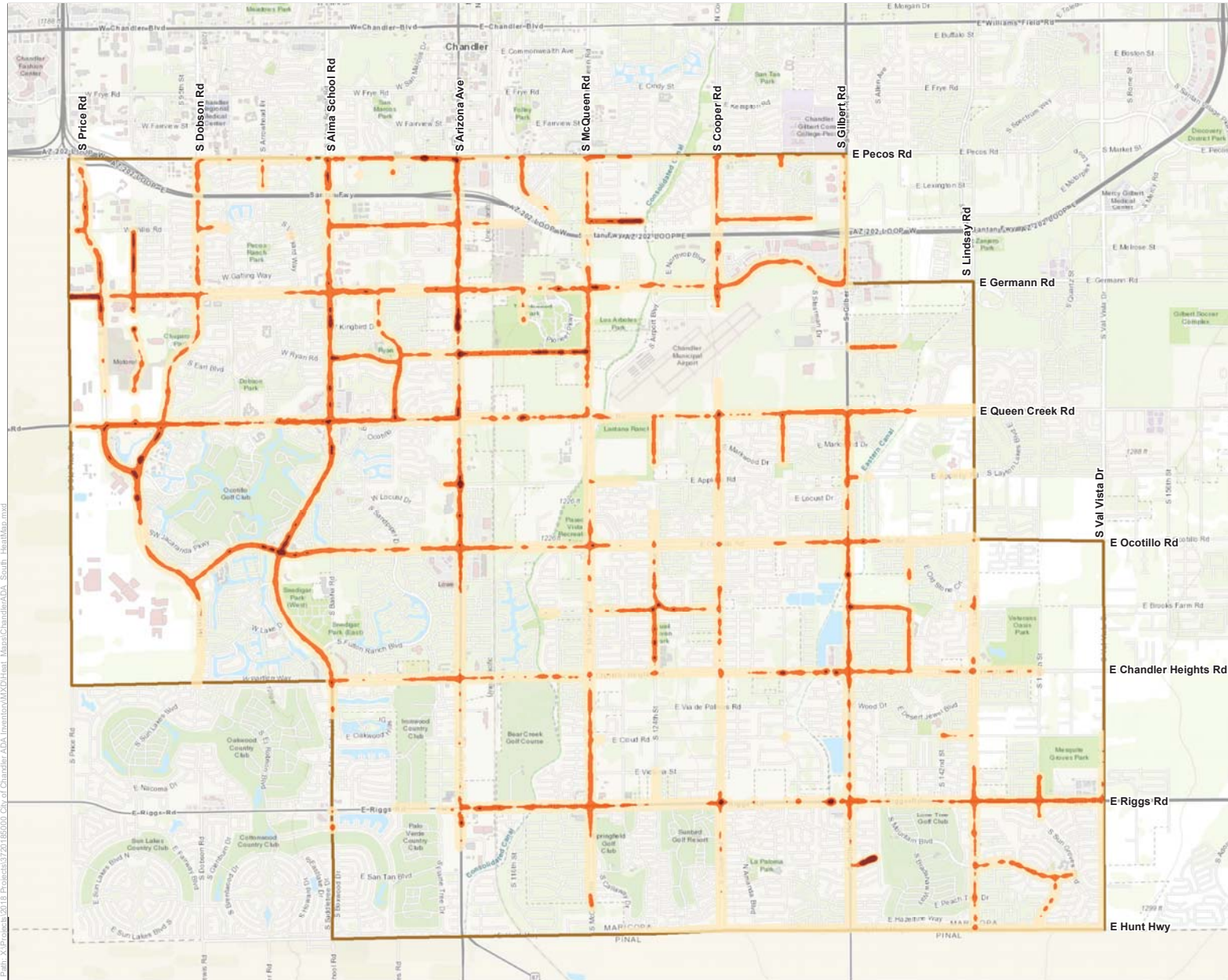
City of Chandler ADA Inventory and Transition Plan

Figure 1 FMA 1-40 Priority Index Map

Job No. 37-2018-5000
PM: DY
Date: 6/15/2020
Scale: 1"= 5000'

wood.

The map shown here has been created with all due and reasonable care and is strictly for use with Wood Project Number 37-2018-5000. This map has not been certified by a licensed land surveyor, and any third party use of this map comes without warranties of any kind. Wood assumes no liability, direct or indirect, whatsoever for any such third party or unintended use.



- Legend**
- FMA South Boundary
 - Total Priority Index Density**
10 foot resolution, 200 foot search radius around each asset
 - Low Priority
 - Medium Priority
 - High Priority



City of Chandler ADA Inventory and Transition Plan	
Figure 2	FMA 41-80 Priority Index Heat Map
Job No. 37-2018-5000 PM: DY Date: 6/12/2020 Scale: 1"= 4,000'	wood.
The map shown here has been created with all due and reasonable care and is strictly for use with Wood Project Number 37-2018-5000. This map has not been certified by a licensed land surveyor, and any third party use of this map comes without warranties of any kind. Wood assumes no liability, direct or indirect, whatsoever for any such third party or unintended use.	

APPENDIX 4

OVERALL IMPROVEMENT COSTS



Chandler ADA					
Engineer's Cost Estimate					
Wood Project No. : 3720185000					
Initial Cost Estimate - (August 2020)					
FMA's 01-40 All Roads					
Description of Asset	Compliance Category	Total Qty	Unit	Unit Price	Total
Sidewalk	>50: Non Compliant - Severe/Significant	250,250	SF	\$ 8.00	\$ 2,002,000.00
11,452 Sidewalks don't exist.	<50: Non Compliant - Moderate/Medium	995,500	SF	\$ 8.00	\$ 7,964,000.00
	<30: Non Compliant - Mild/Minor	13,555,000	SF	\$ 8.00	\$ 108,440,000.00
	0: Fully Compliant Sidewalk	1,665,000	SF	\$ -	\$ -
	Sidewalk Doesn't Exist	2,863,000	SF	\$ 8.00	\$ 22,904,000.00
Depressed Curb Driveway Ramp	>50: Non Compliant - Severe/Significant	120,593	SF	\$ 10.00	\$ 1,205,930.00
	<50: Non Compliant - Moderate/Medium	364,730	SF	\$ 10.00	\$ 3,647,300.00
	<30: Non Compliant - Mild/Minor	744,487	SF	\$ 10.00	\$ 7,444,870.00
	0: Fully Compliant Driveway	389	EA	\$ -	\$ -
Ramps	>50: Non Compliant - Severe/Significant	1,405	EA	\$ 4,000.00	\$ 5,620,000.00
403 Ramps don't exist.	<50: Non Compliant - Moderate/Medium	1,405	EA	\$ 4,000.00	\$ 5,620,000.00
	<30: Non Compliant - Mild/Minor	7,054	EA	\$ 4,000.00	\$ 28,216,000.00
	0: Fully Compliant Ramp	1,067	EA	\$ -	\$ -
	Ramp Doesn't Exist	385	EA	\$ 4,000.00	\$ 1,540,000.00
Remove Existing Concrete	Removal of Non Compliant Assets	16,030,560	SF	\$ 2.00	\$ 32,061,120.00
					\$ -
Subtotal	>50: Non Compliant - Severe/Significant				\$ 8,827,930.00
	<50: Non Compliant - Moderate/Minor				\$ 17,231,300.00
	<30: Non Compliant - Mild/Minor				\$ 144,100,870.00
	No Existing Replace with New				\$ 24,444,000.00
	Removal of Non Compliant Assets				\$ 32,061,120.00
Contingency		20%		\$ 1,765,586.00	\$ 1,765,586.00
Contingency		20%		\$ 3,446,260.00	\$ 3,446,260.00
Contingency		20%		\$ 28,820,174.00	\$ 28,820,174.00
Contingency		20%		\$ 4,888,800.00	\$ 4,888,800.00
Contingency		20%		\$ 6,412,224.00	\$ 6,412,224.00
Total Construction Cost	>50: Non Compliant - Severe/Significant				\$ 10,593,516.00
Total Construction Cost	<50: Non Compliant - Moderate/Minor				\$ 20,677,560.00
Total Construction Cost	<30: Non Compliant - Mild/Minor				\$ 172,921,044.00
Total Construction Cost	No Existing Replace with New				\$ 29,332,800.00
Total Construction Cost	Removal of Non Compliant Assets				\$ 38,473,344.00
Total Overall Construction Cost					\$ 271,998,264.00
ADA PILOT PROJECTS COMPLETED AS PART OF THE PREVIOUS TRANSITION PLAN ARE NOT INCLUDED IN THIS ESTIMATE					



Chandler ADA					
Engineer's Cost Estimate					
Wood Project No. : 3720185000					
Initial Cost Estimate - (August 2020)					
FMA's 41-80 Collectors and Arterials Including Price Road					
Description of Asset	Compliance Category	Total Qty	Unit	Unit Price	Total
Sidewalk	>50: Non Compliant - Severe/Significant	1,750	SF	\$ 8.00	\$ 14,000.00
1,311 Sidewalks don't exist.	<50: Non Compliant - Moderate/Minor	36,250	SF	\$ 8.00	\$ 290,000.00
	<30: Non Compliant - Mild/Minor	1,697,500	SF	\$ 8.00	\$ 13,580,000.00
	0: Fully Compliant Sidewalk	1,306,000	SF	\$ -	\$ -
	Sidewalk Doesn't Exist	327,750	SF	\$ 8.00	\$ 2,622,000.00
Depressed Curb Driveway Ramp	>50: Non Compliant - Severe/Significant	430	SF	\$ 10.00	\$ 4,300.00
	<50: Non Compliant - Moderate/Minor	13,055	SF	\$ 10.00	\$ 130,550.00
	<30: Non Compliant - Mild/Minor	1,518,307	SF	\$ 10.00	\$ 15,183,070.00
	0: Fully Compliant Driveway	6	EA	\$ -	\$ -
Ramps	>50: Non Compliant - Severe/Significant	8	EA	\$ 4,000.00	\$ 32,000.00
41 Ramps don't exist.	<50: Non Compliant - Moderate/Minor	237	EA	\$ 4,000.00	\$ 948,000.00
	<30: Non Compliant - Mild/Minor	1,855	EA	\$ 4,000.00	\$ 7,420,000.00
	0: Fully Compliant Driveway	177	EA	\$ -	\$ -
	Ramp Doesn't Exist	41	EA	\$ 4,000.00	\$ 164,000.00
Remove Existing Concrete	Removal of Non Compliant Assets	3,267,292	SF	\$ 2.00	\$ 6,534,584.00
					\$ -
Subtotal	>50: Non Compliant - Severe/Significant				\$ 50,300.00
	<50: Non Compliant - Moderate/Minor				\$ 1,368,550.00
	<30: Non Compliant - Mild/Minor				\$ 36,183,070.00
	No Existing Replace with New				\$ 2,786,000.00
	Removal of Non Compliant Assets				\$ 6,534,584.00
Contingency		20%		\$ 10,060.00	\$ 10,060.00
Contingency		20%		\$ 273,710.00	\$ 273,710.00
Contingency		20%		\$ 7,236,614.00	\$ 7,236,614.00
Contingency		20%		\$ 557,200.00	\$ 557,200.00
Contingency		20%		\$ 1,306,916.80	\$ 1,306,916.80
Total Construction Cost	>50: Non Compliant - Severe/Significant				\$ 60,360.00
Total Construction Cost	<50: Non Compliant - Moderate/Minor				\$ 1,642,260.00
Total Construction Cost	<30: Non Compliant - Mild/Minor				\$ 43,419,684.00
Total Construction Cost	No Existing Replace with New				\$ 3,343,200.00
Total Construction Cost	Removal of Non Compliant Assets				\$ 7,841,500.80
Total Overall Construction Cost					\$ 56,307,004.80

TOP 17 (NON-COMPLIANT) FMA QUARTER SECTIONS

TOP 11 (NON-COMPLIANT) SOUTH FMA ROADWAYS

Chandler ADA
Engineer's Cost Estimate
Wood Project No. : 3720185000
Initial Cost Estimate - (August 2020)
FMA's 01-40 Quarter Sections

FMA 4
QUARTER SECTION NW

<i>Description of Asset</i>	<i>Compliance Category</i>	<i>Total Qty</i>	<i>Unit</i>	<i>Unit Price</i>	<i>Total</i>
Sidewalk	New or Replaced	23,040	SF	\$ 8.00	\$184,320.00
Depressed Curb Driveway Ramp	New or Replaced	681	SF	\$ 10.00	\$ 6,810.00
Ramps	New or Replaced	8	EA	\$ 4,000.00	\$ 32,000.00
Remove Existing Concrete	Removal of Non Compliant Assets	24,692	SF	\$ 2.00	\$ 49,384.00
Subtotal					\$272,514.00
Contingency		20%		\$ 54,502.80	\$ 54,502.80
Total Overall Construction Cost					\$327,016.80

FMA 4
QUARTER SECTION SW

<i>Description of Asset</i>	<i>Compliance Category</i>	<i>Total Qty</i>	<i>Unit</i>	<i>Unit Price</i>	<i>Total</i>
Sidewalk	New or Replaced	24,702	SF	\$ 8.00	\$197,616.00
Depressed Curb Driveway Ramp	New or Replaced	15,076	SF	\$ 10.00	\$150,760.00
Ramps	New or Replaced	33	EA	\$ 4,000.00	\$132,000.00
Remove Existing Concrete	Removal of Non Compliant Assets	44,230	SF	\$ 2.00	\$ 88,460.00
Subtotal					\$568,836.00
Contingency		20%		\$113,767.20	\$113,767.20
Total Overall Construction Cost					\$682,603.20

Chandler ADA
Engineer's Cost Estimate
Wood Project No. : 3720185000
Initial Cost Estimate - (August 2020)
FMA's 01-40 Quarter Sections

FMA 8
QUARTER SECTION NW

<i>Description of Asset</i>	<i>Compliance Category</i>	<i>Total Qty</i>	<i>Unit</i>	<i>Unit Price</i>	<i>Total</i>
Sidewalk	New or Replaced	21,585	SF	\$ 8.00	\$172,680.00
Depressed Curb Driveway Ramp	New or Replaced	7,819	SF	\$ 10.00	\$ 78,190.00
Ramps	New or Replaced	15	EA	\$ 4,000.00	\$ 60,000.00
Remove Existing Concrete	Removal of Non Compliant Assets	31,286	SF	\$ 2.00	\$ 62,572.00
Subtotal					\$373,442.00
Contingency		20%		\$ 74,688.40	\$ 74,688.40
Total Overall Construction Cost					\$448,130.40

FMA 8
QUARTER SECTION SW

<i>Description of Asset</i>	<i>Compliance Category</i>	<i>Total Qty</i>	<i>Unit</i>	<i>Unit Price</i>	<i>Total</i>
Sidewalk	New or Replaced	16,562	SF	\$ 8.00	\$132,496.00
Depressed Curb Driveway Ramp	New or Replaced	5,441	SF	\$ 10.00	\$ 54,410.00
Ramps	New or Replaced	41	EA	\$ 4,000.00	\$164,000.00
Remove Existing Concrete	Removal of Non Compliant Assets	27,461	SF	\$ 2.00	\$ 54,922.00
Subtotal					\$405,828.00
Contingency		20%		\$ 81,165.60	\$ 81,165.60
Total Overall Construction Cost					\$486,993.60

Chandler ADA
Engineer's Cost Estimate
Wood Project No. : 3720185000
Initial Cost Estimate - (August 2020)
FMA's 01-40 Quarter Sections

FMA 17

QUARTER SECTION NW

<i>Description of Asset</i>	<i>Compliance Category</i>	<i>Total Qty</i>	<i>Unit</i>	<i>Unit Price</i>	<i>Total</i>
Sidewalk	New or Replaced	11,819	SF	\$ 8.00	\$ 94,552.00
Depressed Curb Driveway Ramp	New or Replaced	6,607	SF	\$ 10.00	\$ 66,070.00
Ramps	New or Replaced	36	EA	\$ 4,000.00	\$144,000.00
Remove Existing Concrete	Removal of Non Compliant Assets	21,647	SF	\$ 2.00	\$ 43,294.00
Subtotal					\$347,916.00
Contingency		20%		\$ 69,583.20	\$ 69,583.20
Total Overall Construction Cost					\$417,499.20

FMA 19

QUARTER SECTION SE

<i>Description of Asset</i>	<i>Compliance Category</i>	<i>Total Qty</i>	<i>Unit</i>	<i>Unit Price</i>	<i>Total</i>
Sidewalk	New or Replaced	24,666	SF	\$ 8.00	\$197,328.00
Depressed Curb Driveway Ramp	New or Replaced	6,736	SF	\$ 10.00	\$ 67,360.00
Ramps	New or Replaced	55	EA	\$ 4,000.00	\$220,000.00
Remove Existing Concrete	Removal of Non Compliant Assets	35,959	SF	\$ 2.00	\$ 71,918.00
Subtotal					\$556,606.00
Contingency		20%		\$111,321.20	\$111,321.20
Total Overall Construction Cost					\$667,927.20

Chandler ADA
Engineer's Cost Estimate
Wood Project No. : 3720185000
Initial Cost Estimate - (August 2020)
FMA's 01-40 Quarter Sections

FMA 20
QUARTER SECTION SW

<i>Description of Asset</i>	<i>Compliance Category</i>	<i>Total Qty</i>	<i>Unit</i>	<i>Unit Price</i>	<i>Total</i>
Sidewalk	New or Replaced	918	SF	\$ 8.00	\$ 7,344.00
Depressed Curb Driveway Ramp	New or Replaced	1,432	SF	\$ 10.00	\$ 14,320.00
Ramps	New or Replaced	7	EA	\$ 4,000.00	\$ 28,000.00
Remove Existing Concrete	Removal of Non Compliant Assets	3,142	SF	\$ 2.00	\$ 6,284.00
Subtotal					\$ 55,948.00
Contingency		20%		\$ 11,189.60	\$ 11,189.60
Total Overall Construction Cost					\$ 67,137.60

FMA 20
QUARTER SECTION SE

<i>Description of Asset</i>	<i>Compliance Category</i>	<i>Total Qty</i>	<i>Unit</i>	<i>Unit Price</i>	<i>Total</i>
Sidewalk	New or Replaced	27,177	SF	\$ 8.00	\$217,416.00
Depressed Curb Driveway Ramp	New or Replaced	11,757	SF	\$ 10.00	\$117,570.00
Ramps	New or Replaced	26	EA	\$ 4,000.00	\$104,000.00
Remove Existing Concrete	Removal of Non Compliant Assets	41,354	SF	\$ 2.00	\$ 82,708.00
Subtotal					\$521,694.00
Contingency		20%		\$104,338.80	\$104,338.80
Total Overall Construction Cost					\$626,032.80

Chandler ADA
Engineer's Cost Estimate
Wood Project No. : 3720185000
Initial Cost Estimate - (August 2020)
FMA's 01-40 Quarter Sections

FMA 22
QUARTER SECTION NW

<i>Description of Asset</i>	<i>Compliance Category</i>	<i>Total Qty</i>	<i>Unit</i>	<i>Unit Price</i>	<i>Total</i>
Sidewalk	New or Replaced	14,250	SF	\$ 8.00	\$114,000.00
Depressed Curb Driveway Ramp	New or Replaced	6,895	SF	\$ 10.00	\$ 68,950.00
Ramps	New or Replaced	46	EA	\$ 4,000.00	\$184,000.00
Remove Existing Concrete	Removal of Non Compliant Assets	28,354	SF	\$ 2.00	\$ 56,708.00
Subtotal					\$423,658.00
Contingency		20%		\$ 84,731.60	\$ 84,731.60
Total Overall Construction Cost					\$508,389.60

FMA 24
QUARTER SECTION SE

<i>Description of Asset</i>	<i>Compliance Category</i>	<i>Total Qty</i>	<i>Unit</i>	<i>Unit Price</i>	<i>Total</i>
Sidewalk	New or Replaced	16,942	SF	\$ 8.00	\$135,536.00
Depressed Curb Driveway Ramp	New or Replaced	2,771	SF	\$ 10.00	\$ 27,710.00
Ramps	New or Replaced	63	EA	\$ 4,000.00	\$252,000.00
Remove Existing Concrete	Removal of Non Compliant Assets	25,062	SF	\$ 2.00	\$ 50,124.00
Subtotal					\$465,370.00
Contingency		20%		\$ 93,074.00	\$ 93,074.00
Total Overall Construction Cost					\$558,444.00

Chandler ADA
Engineer's Cost Estimate
Wood Project No. : 3720185000
Initial Cost Estimate - (August 2020)
FMA's 01-40 Quarter Sections

FMA 30
QUARTER SECTION NE

<i>Description of Asset</i>	<i>Compliance Category</i>	<i>Total Qty</i>	<i>Unit</i>	<i>Unit Price</i>	<i>Total</i>
Sidewalk	New or Replaced	19,846	SF	\$ 8.00	\$158,768.00
Depressed Curb Driveway Ramp	New or Replaced	1,591	SF	\$ 10.00	\$ 15,910.00
Ramps	New or Replaced	9	EA	\$ 4,000.00	\$ 36,000.00
Remove Existing Concrete	Removal of Non Compliant Assets	22,258	SF	\$ 2.00	\$ 44,516.00
Subtotal					\$255,194.00
Contingency		20%		\$ 51,038.80	\$ 51,038.80
Total Overall Construction Cost					\$306,232.80

FMA 30
QUARTER SECTION SE

<i>Description of Asset</i>	<i>Compliance Category</i>	<i>Total Qty</i>	<i>Unit</i>	<i>Unit Price</i>	<i>Total</i>
Sidewalk	New or Replaced	14,283	SF	\$ 8.00	\$114,264.00
Depressed Curb Driveway Ramp	New or Replaced	0	SF	\$ 10.00	\$ -
Ramps	New or Replaced	6	EA	\$ 4,000.00	\$ 24,000.00
Remove Existing Concrete	Removal of Non Compliant Assets	15,166	SF	\$ 2.00	\$ 30,332.00
Subtotal					\$168,596.00
Contingency		20%		\$ 33,719.20	\$ 33,719.20
Total Overall Construction Cost					\$202,315.20

Chandler ADA
Engineer's Cost Estimate
Wood Project No. : 3720185000
Initial Cost Estimate - (August 2020)
FMA's 01-40 Quarter Sections

FMA 31
QUARTER SECTION NE

<i>Description of Asset</i>	<i>Compliance Category</i>	<i>Total Qty</i>	<i>Unit</i>	<i>Unit Price</i>	<i>Total</i>
Sidewalk	New or Replaced	15,196	SF	\$ 8.00	\$121,568.00
Depressed Curb Driveway Ramp	New or Replaced	2,331	SF	\$ 10.00	\$ 23,310.00
Ramps	New or Replaced	25	EA	\$ 4,000.00	\$100,000.00
Remove Existing Concrete	Removal of Non Compliant Assets	19,660	SF	\$ 2.00	\$ 39,320.00
Subtotal					\$284,198.00
Contingency		20%		\$ 56,839.60	\$ 56,839.60
Total Overall Construction Cost					\$341,037.60

FMA 31
QUARTER SECTION NW

<i>Description of Asset</i>	<i>Compliance Category</i>	<i>Total Qty</i>	<i>Unit</i>	<i>Unit Price</i>	<i>Total</i>
Sidewalk	New or Replaced	10,651	SF	\$ 8.00	\$ 85,208.00
Depressed Curb Driveway Ramp	New or Replaced	3,805	SF	\$ 10.00	\$ 38,050.00
Ramps	New or Replaced	12	EA	\$ 4,000.00	\$ 48,000.00
Remove Existing Concrete	Removal of Non Compliant Assets	15,987	SF	\$ 2.00	\$ 31,974.00
Subtotal					\$203,232.00
Contingency		20%		\$ 40,646.40	\$ 40,646.40
Total Overall Construction Cost					\$243,878.40

Chandler ADA
Engineer's Cost Estimate
Wood Project No. : 3720185000
Initial Cost Estimate - (August 2020)
FMA's 01-40 Quarter Sections

FMA 31
QUARTER SECTION SW

<i>Description of Asset</i>	<i>Compliance Category</i>	<i>Total Qty</i>	<i>Unit</i>	<i>Unit Price</i>	<i>Total</i>
Sidewalk	New or Replaced	5,247	SF	\$ 8.00	\$ 41,976.00
Depressed Curb Driveway Ramp	New or Replaced	209	SF	\$ 10.00	\$ 2,090.00
Ramps	New or Replaced	1	EA	\$ 4,000.00	\$ 4,000.00
Remove Existing Concrete	Removal of Non Compliant Assets	5,604	SF	\$ 2.00	\$ 11,208.00
Subtotal					\$ 59,274.00
Contingency		20%		\$ 11,854.80	\$ 11,854.80
Total Overall Construction Cost					\$ 71,128.80

FMA 33
QUARTER SECTION NE

<i>Description of Asset</i>	<i>Compliance Category</i>	<i>Total Qty</i>	<i>Unit</i>	<i>Unit Price</i>	<i>Total</i>
Sidewalk	New or Replaced	22,453	SF	\$ 8.00	\$179,624.00
Depressed Curb Driveway Ramp	New or Replaced	5,760	SF	\$ 10.00	\$ 57,600.00
Ramps	New or Replaced	67	EA	\$ 4,000.00	\$268,000.00
Remove Existing Concrete	Removal of Non Compliant Assets	34,861	SF	\$ 2.00	\$ 69,722.00
Subtotal					\$574,946.00
Contingency		20%		\$114,989.20	\$114,989.20
Total Overall Construction Cost					\$689,935.20

Chandler ADA
Engineer's Cost Estimate
Wood Project No. : 3720185000
Initial Cost Estimate - (August 2020)
FMA's 01-40 Quarter Sections

FMA 33
QUARTER SECTION SE

<i>Description of Asset</i>	<i>Compliance Category</i>	<i>Total Qty</i>	<i>Unit</i>	<i>Unit Price</i>	<i>Total</i>
Sidewalk	New or Replaced	16,798	SF	\$ 8.00	\$134,384.00
Depressed Curb Driveway Ramp	New or Replaced	3,511	SF	\$ 10.00	\$ 35,110.00
Ramps	New or Replaced	22	EA	\$ 4,000.00	\$ 88,000.00
Remove Existing Concrete	Removal of Non Compliant Assets	22,298	SF	\$ 2.00	\$ 44,596.00
Subtotal					\$302,090.00
Contingency		20%		\$ 60,418.00	\$ 60,418.00
Total Overall Construction Cost					\$362,508.00



APPENDIX B: PUBLIC FEEDBACK REPORT

TO: Jason Crampton, City of Chandler ADA Coordinator
Daniel Haskins, City of Chandler Project Manager

FROM: John N. McGovern, Principal-in-Charge, WT Group Accessibility Practice

RE: **ADA TRANSITION PLAN PUBLIC FEEDBACK SESSIONS**

DATE: March 20, 2020

Introduction

The Transition Plan is required by the [title II regulation](#) published by the United States Department of Justice (DOJ), implementing the Americans with Disabilities Act (ADA). In developing a Transition Plan, the title II regulation also requires the City of Chandler to seek feedback from citizens who have a disability, or can speak on behalf of those with disabilities. This report is a summary of activity related to that requirement.

Public Feedback Sessions

Four public feedback sessions were planned for March 4th and 5th in Chandler. The two sessions on the 4th focused on public rights of way, and the two sessions on the 5th focused on parks and facilities. A total of 12 community members attended the sessions. The second session on March 4th for public rights of way had no attendance, and adjourned early.

Each session began with a general review of the title II requirements for existing sites. Each group then saw some examples of existing conditions and how that relates to development of a working plan, or transition plan, for the City. Several questions were posed to elicit feedback from the attendees. Commonalities in the parks and facilities sessions were access to parks themselves and the assets within. High use sites were seen by attendees as a priority as were restrooms at sites. A key issue was the ability by the visitor to research an area for accessibility prior to visiting. Transparency on this is of vital importance to the portion of the population with physical disabilities.

A summary of each session is included below.

**ADA Transition Plan Update
Public Meeting No. 1
Public Rights-of-Way, 3/4/20, 2:00 pm
Chandler Downtown Library, 22 S Delaware St, Cotton Room**

Present:

**Jason Crampton (COC Staff)
Allan Zimmerman (COC Staff)
Dan Haskins (COC Staff)
Kim Moon (COC Staff)**

**Justin Dagostino
John Repar (Chandler Transportation Committee)
Fatma Abid (student journalist)
Sharon Cini (City of Scottsdale)**

City of Chandler
Appendix B: Public Feedback Report
March 20, 2020 Page 2

Nancy Jackson (COC Staff)
Craig Younger (COC Staff)
Kelly Figueroa (Sign Language Int.)
Dick Yano, Wood, Inc.
John McGovern, WTG

Kevin Lair (COC Staff)
Holly Granillo (COC Staff)
Teresa Makinen, MakPro
Shelley Zuniga, WTG

Participants arrived and signed in. Jason Crampton, Chandler's ADA Coordinator welcomed the attendees and provided an overview of the project. He explained this is the first of four public meetings with the first two focusing on public right-of-way and the second two focusing on parks and facilities. He noted that this process began in 2014, and that WT Group was retained by the City in early 2018 to finish the project. He emphasized that the focus is on sites owned or operated by the City of Chandler, not other jurisdictions such as Maricopa County, the State, or the Chandler Unified School District.

Teresa Makinen, Public Outreach Coordinator for Public Right-of-Way (PROW), introduced the project team and asked those attending to introduce themselves. She reviewed the meeting agenda, and John McGovern from the WT Group and Dick Yano from Wood, Inc. provided a presentation on the scope of work, information on ADA requirements, and work to date on the Transition Plan.

Makinen asked if there were any questions about the presentation or anything that needed clarification. Participant questions or comments are bulleted and in quotation marks. Responses by project team members are preceded with an "A":

- "What is the relation between the data and how it moves to the decision makers or government? Who is responsible for the implementation?"

A: Part of it is the prioritization that is included in the update...for instance, highly used areas versus remote areas. In Downtown Chandler, it is an area of attraction. Are there problems or is it all right? Part of the answer is addressed by the federal government. Assets serving state, county, public schools, or municipal sites are a priority for accessibility. The City is considering how difficult it is to maneuver through an area. Our recommendation will go to the City and they blend it with the existing Capital Improvement Plan. The transition plan will identify steps Chandler needs to take, but the City is responsible for implementation. (McGovern, Yano, Crampton)

- "Regarding the tension between public and private, for public space, we understand the City is making changes but (in this person's view) the private sector does what they want. We hope the businesses are inspired and understand that the more accessible they are, the more successful they will be. They are cutting off 10% of the population. We view those businesses that have access issues as unfriendly and inaccessible. We (people with disabilities) have a different set of requirements. We map things out...we will go here but not there...it's a big part of how we think. The public spaces are pretty good and we want the private sector to learn from the public sector."

A: The City gets constant questions from the public wanting us to address private shopping centers or businesses but the City has no authority to force a privately owned business to make itself accessible. There are laws though. Typically, when someone is opening a business, they'll come to the City for permits and the City will say they need to meet ADA requirements, and that addresses new sites. (Crampton)

City of Chandler
Appendix B: Public Feedback Report
March 20, 2020 Page 3

Ongoing, existing businesses operate under different rules than new businesses do. Business owners have access to tax credits or tax deductions annually, but it is suspected that many do not make accessibility improvements until the value can be offset by the tax credit available through the Internal Revenue Service. (McGovern)

- “I want to encourage the private sector to realize that until we feel accepted, we draw a hard line between friendly and accessible or not. We know where they are. Parking is a major issue. We want to be able to go where we want and get there on our own. There are four issues I see: employment, housing, transportation, and general healthcare.”

A: McGovern with WTG said it is not unusual to see the business community lag behind the public sector. The way the ADA applies to a city is very different than the way it applies to a business or nonprofit. McGovern offered to, when he is here reporting to City officials, to present information for businesses to inform them...perhaps through a meeting with the Chamber of Commerce.

- “I’d be more than happy to laud and promote Chandler as friendly and accessible. A lot of us are forced into situations we don’t want to be in, such as being placed in nursing homes. Chandler can foster that independence if we can communicate outward.”

Makinen asked if there are areas in Chandler where the attendees have noticed challenges.

- “Downtown is pretty good, and parking is accessible. I haven’t spent a lot of time in parks or those types of facilities. I think of Chandler as a progressive, friendly city.”

A: Crampton noted that it is a good thing that the commenter could think of no challenges.

- “I would say I have a positive impression of Chandler. Does the data you’re collecting, when you look at a sidewalk or pathway...we hate little breaks or a lip (change in level), especially if you’re in a wheelchair...does your data look at that?”

A: Yes, both at PROW and parks and facilities we are able to pick up imperfections at that level. (Yano, McGovern)

- “Flatness is a big deal...we hate hills. I think let’s make the Phoenix Metro area the most successful.”
- “Accessibility with flatness and ramps extended so there are no high inclines. How do we determine where attention is needed...do you track population?”

A: That’s in the activity consideration for PROW. (Yano)

- [from City of Scottsdale’s ADA Coordinator who attended the meeting] “Thinking of public outreach, it’s fairly scary if you’re new to ADA. One of the reasons I like ADA is its inclusion and compliance.”
- “It might be proactive for economic development to promote accessibility opportunities through the City of Chandler. Ask how they promote employment in their company to disabled people.”

A: That’s a good point, it could be an opportunity. (Crampton)

City of Chandler
Appendix B: Public Feedback Report
March 20, 2020 Page 4

- “We should include an option for accessibility issues or suggestions online and include it as an option on the maps for the City’s “Public Stuff” app.” (comment by COC staff)
- “Brick and mortar is one thing but there’s also digital accessibility. We want accessibility for visually and auditory impairments. Chandler wants to be open and accessible...they are two different layers, but both are important.”

Makinen thanked the participants for their time and the meeting ended at 3:40 p.m.

ADA Transition Plan Update
Public Meeting No. 3
Parks and Facilities 3/5/2020, 2:00 pm
Tumbleweed Recreation Center

Present:

Jason Crampton (COC Staff)
Dan Haskins (COC Staff)
Mickey Ohland (COC Staff)
Nancy Jackson (COC Staff)
Collette Prather (COC Staff)
Craig Younger (COC Staff)
Rex Hartmann (COC Staff)

Justin Dagostino
Kelly B. (sign language interpreter)
Linda and Chris Cholas
Kim Foy (Mayor’s Committee)
Nancy Martinez (COC Staff/Resident)
Mike Hollingswerth (COC Staff)

Participants arrived and signed in. Jason Crampton, Chandler’s ADA Coordinator welcomed the attendees and provided an overview of the project. He explained this is the third of four public meetings with the first two focusing on public right-of-way and the second two focusing on parks and facilities. He noted that this process began in 2014, and that WT Group was retained by the City in early 2018 to finish the project. He emphasized that the focus is on sites owned or operated by the City of Chandler, not other jurisdictions such as Maricopa County, the State, or the Chandler Unified School District.

John McGovern at WTG and Shelley Zuniga at WTG facilitated this session. They asked those attending to introduce themselves. McGovern reviewed the meeting agenda, and he and Zuniga provided a presentation on the scope of work, information on ADA requirements, and work to date on the Transition Plan.

McGovern asked if there were any questions about the presentation or anything that needed clarification. Participant questions or comments are bulleted and in quotation marks. Responses by project team members are preceded with an “A”:

- Dagostino: “Is there a standard distance of trail length that is required to be accessible?”

A: the trail standards are not yet final, but the “program” of trails must be accessible. That being said, existing trails are difficult to retrofit, so new trails should be planned. (McGovern, Zuniga)
- Dagostino: “It would be helpful to have a means of researching sites and facilities for their accessibility as the population of people with physical needs do a lot of pre-planning before they go

City of Chandler
Appendix B: Public Feedback Report
March 20, 2020 Page 5

anywhere to avoid barriers and frustration upon arrival. Detail of site amenities and their accessibility should be on the website.”

A: COC staff and WTG staff agreed.

- Cholas, Chris: “If Chandler moves forward on work that is above the minimum, they could be viewed as a city that is ‘setting a new standard’ for accessibility.”

A: COC staff Younger mentioned that there is an opportunity for public comment on their website as well as their new app called “Public Stuff”. This enables citizen to identify specific issues such as sidewalks in disrepair.

- Foy: “Is there a plan for special events that looks at accessibility issues such as cables running across public pathways?”

A: COC staff Crampton said there is a citywide Special Events committee and it does address parking and restroom issues. He was unaware how much discussion was had with the event sponsors related to access. WTG McGovern indicated that WTG has a PowerPoint presentation on planning accessible special events and it can be shared with COC staff.

- Dagostino: is a specific number of parking stalls required in a parking lot?

A: He was informed that there is a formula in the standards that is roughly one accessible stall for every 25 standard stall. There is also a requirement for marking and signage. Chris added that the city should keep in mind that the standard sets a minimum.

- Some general comments by the audience:

- Please don’t use engineered wood fiber as a playground surface – very hard to maneuver
- Public Recreation areas/pools – pool lifts are important
- Restrooms need to be compliant

- High Priority: the audience thought that high priority sites should include the sites most heavily used, and that the City should start with the basics, such as parking, restrooms, and entries. Audience also thought public spaces should have a higher priority than spaces used only by employees.
- Dagostino: suggested a survey of the disabled population – most are just looking for a good experience.
- Cholas, Linda: indicated that they are travelers and have a difficult time finding accessible hotel rooms. Can the city work with businesses to education them on access? Look to the economic development team to work with title III entities. Also suggested that toilet seats are a big issue as most are not sturdy enough – suggested sturdy seats with steel mounts.

Attendees were thanked for their feedback and the meeting adjourned.

ADA Transition Plan Update
Public Meeting No. 4
Parks and Facilities 3/5/2020, 5:30 pm
Tumbleweed Recreation Center

Present:

Chandler Staff:

Jason Crampton (COC Staff)
Warren White (COC Staff)
Collette Prather (COC Staff)
Craig Younger (COC Staff)
Marcos Castillo

Community Members:

Justin DiAgostino
Tim Surry
Kara Swierz
Deanna Zuppan (City of Scottsdale)
Spencer Parkes (sign language interpreter)

Participants arrived and signed in. Jason Crampton, Chandler's ADA Coordinator welcomed the attendees and provided an overview of the project. He explained this is the third of four public meetings with the first two focusing on public right-of-way and the second two focusing on parks and facilities. He noted that this process began in 2014, and that WT Group was retained by the City in early 2018 to finish the project. He emphasized that the focus is on sites owned or operated by the City of Chandler, not other jurisdictions such as Maricopa County, the State, or the Chandler Unified School District.

John McGovern at WTG and Shelley Zuniga at WTG facilitated this session. They asked those attending to introduce themselves. McGovern reviewed the meeting agenda, and he and Zuniga provided a presentation on the scope of work, information on ADA requirements, and work to date on the Transition Plan.

McGovern asked if there were any questions about the presentation or anything that needed clarification. Participant questions or comments are bulleted and in quotation marks. Responses by project team members are preceded with an "A":

- Castillo: has there been any study done on traffic lights?

A: Chandler has the data, but hasn't moved forward on anything yet.

- How will types of assets be prioritized?

A: That is a part of why these sessions are being held (McGovern, Crampton)

- Some suggestions from the audience on types of assets to be made a higher priority included:
 - City Hall
 - Sidewalks
 - Parks/pools
 - Golf Courses
 - Restrooms – adult changing tables (look into new legislation mandating these)

City of Chandler
Appendix B: Public Feedback Report
March 20, 2020 Page 7

- Dagostino: is there language in the standards about line of sight at events?

A: McGovern and Zuniga noted that there are specific standards for both seated and standing events for line of sight.

- Other general factors to consider from the audience included the sites most heavily used and to disperse accessible sites throughout Chandler.
- An audience member asked that since there are incentives for green buildings, can incentives be created for accessible buildings?

A: McGovern indicated that there are tax credits and tax deductions for title III entities that remove barriers. Younger mentioned the Public Stuff app again, for use in reporting access issues. White mentioned that traffic has gotten access modification requests as well, for parking spaces and curb ramps in areas were needed by citizens.

Attendees were thanked for their feedback and the meeting adjourned.



APPENDIX C: PROGRAM AND POLICY REPORT



Engineering • Design • Consulting

June 29, 2020

Jason Crampton
ADA Coordinator/Transportation Planning Supervisor
City of Chandler
175 S. Arizona Avenue, 4th Floor, City Hall
Chandler, AZ 85225

Re: Program and Policy Report

Dear Jason:

Policies and processes drive programming to a great extent, and programs must adhere to city policies. ***Because of that relationship, we have combined our program review and policy review into this single report.*** This report also addresses an issue at the forefront of everyone's thoughts this summer...how to balance the requirements of the Americans with Disabilities Act (ADA) with any coronavirus restrictions.

Title II of the Americans with Disabilities Act (ADA) applies to cities, counties, states, and units of local government, and imposes some affirmative requirements as well as some specific prohibitions. The 2016 Partial Transition Plan included a review of programs and some policies within city divisions and departments (see pages 19 through 72). We do not duplicate that effort, as it was not in our scope of work. That said, that portion of the 2016 Partial Transition Plan can be complemented with some additional information.

In this report, we refer to the [title II regulation](#) published by the US DOJ. The latest revision of the regulation became effective March 15, 2011. It is unlikely that any changes will be made in the regulation in the next several years.

In this report, we apply smart practices to programs and policies that other cities have implemented successfully. This report provides an overview of title II requirements. We then review program processes and make recommendations to the city for compliance. Think of this as a smart practice to implement the ADA requirements.

The Coronavirus and Covid-19

As the Americans with Disabilities Act (ADA) Transition Plan reports were being completed for the City of Chandler, a global pandemic occurred. The novel coronavirus, which causes Covid-19, has changed the way people gather and use city facilities, programs, and services.

The likely impacts on cities across the United States are many, and include fiscal shortfalls, higher maintenance and cleaning costs, closing and reopening some city facilities and assets, and managing employees working remotely, to name a few.

We do not know all of the implications and impacts of Covid-19. The Governor of Arizona ordered bars, gyms, and some other types of establishments to close for 30 days. We do know that this is an evolving situation that will have impacts on the city for years to come.

We do anticipate that the Capital Improvement Plan for the city will be slowed as other priorities related to Covid-19 assume a higher priority. We urge the city to continue to make the Transition Plan work a priority, even if it is slowed along with other work, so the city can properly address the coronavirus.

We also urge the city to avoid positions related to Covid-19 that interfere with, or restrict, the rights of people with disabilities under the ADA. The Department of Justice, the ADA enforcement body, has made it clear that the ADA mandates do not overrule any Covid-19 restrictions, nor do any Covid-19 restrictions overrule the ADA. Instead, as we see with regard to safety and historic sites, these must coexist.

Despite the beliefs of some, claiming that one has a disability that prevents that person from wearing a mask is not a claim that is automatically entitled to be approved. The DOJ requires the city to use an interactive process to gather information. In other words, conduct an assessment and make a decision as to whether the reasonable modification request of not wearing a mask can be provided. Another factor here is whether a person without a mask objectively poses a direct threat, as the Centers for Disease Control and Prevention (CDC) suggests. If the person does pose a direct threat, the city can exclude them from facilities, parks, and programs.

Title II ADA Requirements

Regarding General Administration

The title II section **35.106** Notice requirement comes into play. This requires the city to make people with disabilities aware of how the requirements of the ADA are applied to city programs and services. We also refer to this as the invitation requirement, as it is an opportunity for the city to invite people with disabilities to use its facilities and sites, as well as programs and opportunities.

Recommendation 1: Invite people with disabilities to participate in city programs, and use city sites and facilities.

Sample: "The City of Chandler invites people with disabilities to enjoy our programs, services, parks, trails, and facilities. For more information about our accessibility, inclusion, and special program initiatives, contact Jason Crampton, ADA Coordinator, at 480-782-3440, ada.coordinator@chandleraz.gov.

The title II section **35.107(a)** requirement requires the naming of a "responsible employee," typically known as the ADA Coordinator. As of the completion of this report, the ADA Coordinator role is filled by Jason Crampton, Transportation Policy Supervisor. Be sure all staff is aware of this and advise them of the contact information for the ADA Coordinator.

The title II section **35.107(b)** requirement compels the city to have a process by which people with disabilities can raise complaints about access and inclusion. The process

should provide "...for prompt and equitable resolution of complaints." We see on the city website the Grievance Procedure and Grievance Form. Referring to this as a "complaint process" gives the process and adversarial flavor that is unnecessary at this stage. We have provided a process but have named it the Access and Inclusion Solutions Process. It is attached. We encourage city staff to review it. This approach details the steps for staff to take if they receive a complaint.

Recommendation 2: Review the Access and Inclusion Solutions Process and adopt it for use by the city. Make the Process available on the city website for the public, and be sure all staff is aware of and trained on the process. Retain records for at least three years, and be sure to comply with any Arizona public record retention requirements. We recommend that one if not more city employees become a Certified ADA Coordinator through the ADA Network at this [link](#).

We do caution that city activity regarding **35.106** and **35.107** should be consistent throughout all city departments. Integration of efforts is important and benefits the city as well as your residents with and without disabilities. An excellent approach to this is to have one ADA Coordinator manage human resource issues, another manage the retrofits required in the City of Chandler Transition Plan, and another manage programs and services.

Regarding City Programs and Policies

We start with a discussion about the ADA mandate that programs be provided in the most integrated setting, or as we refer to it, the inclusion mandate.

What is inclusion, or the "most integrated setting"?

The ADA requires the city to make its programs and services accessible to and usable by people with disabilities. The city must provide services in the most integrated setting. That is defined as the setting in which people with and without disabilities interact together. The test is that these services shall be as effective as for a person without a disability.

The most integrated setting requirement is applied to all city programs and activities. The inclusion mandate became effective January 26, 1992. This requirement does have some room for the city to make some interpretations on, for example, just what is a reasonable modification. Find this mandate at title II section **35.130(d)**.

Providing inclusion supports requires an assessment of the person with a disability who is seeking participation. It also requires a plan for supports. Some plans, and some methods of assessment, are more formal than others. A complex plan will require more complex staff training (for the staff implementing the plan), and may be costlier.

Other Title II Requirements

Title II is broad and has many requirements for the city. Below is title II in a nutshell, and all of these are discussed in more detail in the Final Report.

1. Section **35.130(a)** prohibits the city from, because of disability, excluding someone from a program or denying the benefits of a city program to that person. This is a broad anti-discrimination requirement.

2. Section **35.130(b)(1)** prohibits the city from discrimination on the basis of disability through contractors or licensees. This applies to any contractual instructors, leaders, or concessionaires used by the city. These entities or persons must be as welcoming to people with disabilities as is the city.
3. Section **35.130(b)(1)(iv)** prohibits the city from “providing different or separate aids or benefits...unless...necessary to provide programs...” for persons with disabilities. This mandate permits the city to provide “special needs programs” so long as those are not the only opportunity provided for persons with disabilities.
4. Section **35.130(b)(1)(v)** prohibits the city from aiding or perpetuating discrimination by providing “significant assistance” to an agency that does discriminate on the basis of disability. This typically arises when a local government provides grants or other supports to community affiliates or partners that use local government properties to conduct services.

When grants are made, or city properties are made available at reduced rates, the affiliate benefits from taxpayer-funded infrastructure and maintenance. When that occurs, the affiliate cannot be allowed to discriminate on the basis of disability, and the city is expressly prohibited from supporting an agency in that circumstance.

Recommendation 3: Require entities that receive city support (time by city staff, free facility or site use, grants, subsidies, etc.) to agree to comply with the ADA by making reasonable modifications when requested by a person with a disability.

5. Section **35.130(b)(1)(vi)** prohibits the city from denying a person with a disability the opportunity to be considered for a city advisory board or committee. It does not establish a quota, but does require the city to invite and consider otherwise qualified persons with disabilities for such a role.

This is to some extent a demographics issue. Certainly the city attempts to balance men and women in service, areas of residence within the city, age, and ethnicity in making appointments to its 34 committees or commissions. The city should add disability as a factor, not a determinant, but as a factor.

6. Section **35.130(b)(2)** is the converse of **35.130(b)(1)(iv)** and prohibits the city from denying a person with a disability the opportunity to participate in programs that are not separate or special.
7. Section **35.130(b)(3)** prohibits the city from discriminating on the basis of disability through administrative processes. This broad requirement boils down to process issues, and for the city, typically includes program registration or program eligibility processes.
8. Section **35.130(b)(4)** prohibits the city from selecting a site for a new facility or park development at a location that cannot be made accessible. There is a very limited exception here, and that is in regard to a site where compliance with the 2010 Standards is “structurally impracticable”.

9. Section **35.130(b)(5)** prohibits the city from selecting “procurement contractors” when those contractors will act in a discriminatory manner. An example here could be an agency that contracts out for management of a city site. The management firm must make reasonable modifications, and implement the ADA requirements as if it were the title II entity.
10. Section **35.130(b)(6)** prohibits the city from administering a certification or licensing program in a way that discriminates on the basis of disability. This could be a lifeguard certification program that does not make reasonable modifications in the instruction to lifeguards.
11. Section **35.130(b)(7)** requires the city to make “reasonable modifications in policies, practices, or procedures” when doing so will avoid discrimination on the basis of disability. This section does not require the city to do so when it would “fundamentally alter the nature of the service, program, or activity”, a very high bar to meet for the city.

This latter language places the burden on the city to prove fundamental alteration, as opposed to a burden on the person with a disability to prove that a modification is not a fundamental alteration.

12. The city must document the denial of requests for reasonable modification. We recommend a centralized log that has all information related to all requests, approved or denied.
13. Section **35.130(b)(8)** prohibits the city from imposing “eligibility criteria that screen or tend to screen out” otherwise qualified persons with disabilities. This applies to any type of advance notice requirement, such as a requirement that registrants who need a reasonable modification must register two weeks before the program begins. The city has similar language regarding Court access. On the city’s website, residents are directed to:

Please notify the court at 480-782-4700, at least 5 business days PRIOR to your court date of any services that may be necessary and reasonable accommodations will be provided.

We make two comments.

First, we suggest the term be changed to reasonable modification, not accommodation. A reasonable accommodation occurs under the ADA in title I regarding employment. Regarding title II services, the term to use is reasonable modification.

Second, we suggest that if the court does not require persons without disabilities to provide five-day notice, that it cannot do so for people with disabilities.

14. Section **35.130(c)** allows the city to provide benefits or services in excess of the requirements of title II. In other words, please do more. Title II sets the floor, not the ceiling, for city services for people with disabilities.

15. Section **35.130(d)** establishes the requirement that the city will provide “...services, programs, and activities in the most integrated setting”. This is defined as the setting in which people with and without disabilities interact together to the maximum extent feasible.
16. Section **35.130(e)(1)** notes that a person with a disability is not required to accept a modification offered by the city. The consequence of a decision by a person with a disability to not accept modifications however, is that the person must now meet all standard rules for behavior and participation.
17. Section **35.130(e)(2)** notes that a guardian of a person with a disability has no right to “decline food, water, medical treatment, or medical services...” for a person with a disability. While this situation does not arise often, for entities with overnight occurrences, such as emergency shelters, it is an important policy consideration.
18. Section **35.130(f)** prohibits the city from adding a surcharge to fees a person with a disability must pay for participation. A person with a disability in city programs shall be charged the same amount as a person without a disability in that same program, regardless of whether the city is providing other supports, such as extra staff or a sign language interpreter.
19. Section **35.130(g)** prohibits the city from denying participation by a person who is a known associate (family member or friend) of a person with a disability. This “association clause” is common in all civil rights laws.
20. Section **35.130(h)** permits the city to “impose legitimate safety requirements” in programs, and apply these, with a reasonable modification, to persons with disabilities. This clause does require, in strong language, that such safety requirements be “...based on actual risks, not on mere speculation, stereotypes, or generalizations about people with disabilities.”

In other words, safety requirements must be based on actual incident reports or past behavior, not a staff belief that something **could** happen. This may involve a balancing of ADA mandates and Covid-19 restrictions. See a fuller discussion on page 9 of this report.

21. **35.134** prohibits the city from retaliating against a person who has supported the proper implementation of title II requirements. This section also prohibits the coercion or intimidation of any person supporting proper implementation of title II.

Making Modifications to Support Persons with Disabilities
--

Some modifications are clear in the statute and US DOJ regulation. Others are not quite so clear. Additionally, within title II some modifications are not required, such as those related to provision of prescription devices.

The city should provide modifications when the assessment indicates those would be beneficial. We suggest grouping modifications into three categories: mandated supports, personal supports, and quasi-medical or medical supports.

22. Section **35.135** notes that the city is not required to provide personal devices, such as wheelchairs, or prescription devices, such as eyewear. It is safe to say this requirement is a gray area. As a smart practice, many entities such as large retail stores do provide wheelchair-like shopping carts for customers.

This section further states the city is not required to provide services of a personal nature, such as “eating, toileting, or dressing”.

The categories described below are continually evolving. It is important that the city stay current on court and administrative decisions.

23. Mandated Supports

Following an assessment, the city must provide these reasonable modifications. Each is mentioned in the statute, regulation, or court decisions. These include, but are not limited to:

- changes to rules and policies
- providing extra staff support (including one-on-one, based on assessment)
- providing volunteer support in a program
- providing additional training to staff
- acquiring and providing adaptive equipment
- monitoring blood sugar
- removing architectural barriers
- providing accessible transportation
- developing behavior plans
- providing sign language interpreters and other auxiliary aids or services
- adapting policies regarding food and scents in facilities
- providing home visits
- reassigning programs to an accessible location
- requiring contractors to make modifications
- applying emergency allergy epi-pens

24. Personal Supports

The supports here fall into a gray area. We recommend that, as a smart practice, these be provided. We urge the city to discuss these and identify those

already being provided by city staff, and establish a rationale if some are **not** to be provided. These include:

- assisting a registrant in changing clothes if he or she cannot do so because of disability
- assisting a registrant with toileting if he or she cannot do so because of disability
- assisting a registrant with eating if he or she cannot do so because of disability
- holding and presenting medications for a registrant, pursuant to delegation authority granted by the Arizona Nursing Code

25. Quasi-Medical or Medical Supports

Today, these are not required. That said, with the increasing complexity of disability and related health conditions, many persons need assistance with the tasks below. Without help here, these persons cannot participate.

- Retain a nurse, or provide staff training consistent with the Arizona Nursing Code, and when necessary, inject insulin for a person with diabetes who cannot do so herself
- Retain a nurse, or provide staff training consistent with Arizona Nursing Code, and when necessary, rectally apply anti-seizure medication when the registrant is unable to do so himself
- Take other actions, with a nurse or trained employee, that may be viewed as invasive, but is necessary for lifesaving purposes

It is imperative that city staff remain aware of medical technological advances. The US Food and Drug Administration, in early 2020, approved an emergency anti-seizure medication that is not applied rectally, but is instead sprayed into the nostril or mouth of the person having a seizure. This is considerably easier to do than a rectal application, and is likely to be viewed as a reasonable modification.

Many jurisdictions are also considering hiring nurses for summer programs and other programs of a longer duration. There are effective solutions.

We caution the city that if a modification in the latter two categories is already provided, it is difficult to “un-ring” the bell. For example, in other jurisdictions we have discovered that some staff are already providing toileting. An important part of the determination of what is to be provided must be a candid discussion with staffs in a wide range of programs to understand what is happening in the field.

Recommendation 4: Determine which modifications will be made and which will not be made, and make those known to city staffs. (Consistent with smart practices)

26. Section **35.136** requires the city to permit persons with disabilities to use a service animal, so long as it is housebroken and under control. The service animal must be trained to perform a task that relates to the handler's disability.

Recommendation 5: Adopt a service animal policy similar to the one provided to the city by WT Group.

27. Section **35.137** requires the city to permit the use of mobility devices that were not necessarily designed with the transportation of people with disabilities as a primary purpose. These devices, called other power driven mobility devices (OPDMD), can include but are not limited to a Segway, golf car, riding mower with the blades up, or other devices. We address this in our recommendations

Recommendation 6: Adopt a policy regarding the use of Other Power Driven Mobility Devices (OPDMD) that is consistent with our earlier report to the city.

28. Section **35.139** clarifies the approach required by the city with regard to the **35.130(h)** safety requirements clause. The city, here in **35.139**, is allowed to deny participation to a person with a disability when he or she "...poses a direct threat to the health or safety of others".

This clause also requires the city to conduct an individualized assessment in the process of making a direct threat determination. The assessment must rely on current medical information and objective evidence.

We make two observations here. The first is that a direct threat to the person **with** a disability is not referenced in this requirement. We believe that the city has a statutory obligation to keep all individuals in its programs safe. When a person with a disability poses an objective direct threat to himself or herself, he or she should be prevented from harming himself or herself, under state statutes, but not under the ADA.

The second is defining some of the terms. An objective belief that harm did occur, in the mind of employee A, may not exist in the mind of employee B. Simple definitions help here. As an example, a definition of unwanted physical contact might read as "intentional contact by another that results in a bruise, fracture, abrasion, puncture, laceration, or swelling".

As mentioned earlier, in a Covid-19 era, it is likely that a refusal to wear a mask constitutes a direct threat. The research clearly shows that wearing a mask helps protect others from infection. This would allow a city employee to refuse admission or service to a person who refuses to wear a mask.

No person should be removed from programs or barred from participation, because of disability, without a consultation with the ADA Coordinator and the appropriate City Attorney.

Recommendation 7: we recommend that the city consult with the disability advocacy groups, RAD, its own departments that serve people with disabilities, and with local special education providers regarding these definitions.

Implementing the ADA Inclusion Mandate with the Eight-Step Inclusion Process

We believe the city can best implement the “most integrated setting” requirement with an eight-step inclusion process. Entities across the country have implemented this system since the mid-1990s. These eight steps incorporate title II requirements, smart practices, as well as court and administrative decisions. The eight steps are:

1. Invite participation
2. Modify registration forms and processes to facilitate requests for supports
3. Conduct an assessment of the ability of the registrant and program requirements
4. Create a plan for supports after the assessment
5. Train staff that will implement the plan
6. Maintain ongoing communication with the registrant or his or her family
7. Implement the plan
8. Evaluate the effectiveness of the plan

Some of the following recommendations are clear and simple to implement. Others are not so clear because the status of the requirement is evolving. Where the city has alternatives to consider, we have identified those in our recommendation.

Recommendation 8: Invite people with disabilities to participate in city programs, and use city sites and facilities. This is consistent with 35.106. We recommend something like the statement below:

Sample: “The City of Chandler invites people with disabilities to enjoy our programs, services, parks, trails, and facilities. For more information about our accessibility, inclusions, and special program initiatives, contact Jason Crampton, ADA Coordinator, at 480-782-3440, ada.coordinator@chandleraz.gov.

Recommendation 9: Modify registration systems and processes to appropriately ask if registrants require a reasonable modification to use city facilities, programs, or services. This is consistent with 35.130(b)(7).

We recommend the use of language like that below, in print and online registration materials. Again, work with the city’s communications staff so this is consistent with language used in any city publications. When this language is included in all registrations, it is not discriminatory. In addition, when the registrant marks yes to the question below, the system must forward the registration to an appropriate employee for further processing.

“I need a modification because of disability to participate in this program. YES NO”
If a paper registration, this is a simple addition. If online, we urge that the city require the online vendor to make this a mandatory answer, prohibiting the registrant from proceeding without an answer.

Do not hold the registration. If a fee is required and it is paid, and if there is room in the class or activity, enroll the registrant pending the assessment, which is the next step in the process.

An important element of this step is to whom the registration is forwarded. We urge the city to send all registrations that request a reasonable modification directly to a single employee who is responsible for maintaining these requests to the city.

Recommendation 10: Once a registrant has requested a reasonable modification through the registration process, **conduct an assessment**. This is consistent with 35.139 and [Anderson v. Little League](#).

The assessment should occur promptly after the registration. The assessment should contrast the abilities of the registrant to the activities in the program for which he or she registered. The assessor should keep in mind the various modifications that can be made, throughout the assessment process.

City staff should not say the word “no”, in response to a request for modification, in the absence of an assessment. The city must make all registration staffs, managers, facility staffs, seasonal staffs, and others aware of this point. This issue is important and must be reinforced by the city.

In our experience, the best employee to conduct assessments is one who:

- Knows the city and its programs
- Knows a wide range of health and disability conditions
- Knows a wide range of city services
- Is experienced at adapting activities
- Is a good communicator with staffs as well as registrants and their families

We believe strongly that the assessor should not be the same person that plans and conducts programs. While there is crossover in the necessary skills, the assessor must be able to drop other assignments and manage what can be difficult inclusion placements. As to credentials, we suggest that the assessor, which we will call the Manager of Inclusion, should be a Certified ADA Coordinator. Other credentials such as a Certified Therapeutic Recreation Specialist, adaptive PE teacher, art therapist, and so forth, may be effective. In our experience, a CTRS is likely the most effective.

Recommendation 11: Once the assessment has been conducted, **create a plan** to implement the reasonable modification. This is consistent with 35.139 and US DOJ guidance.

Creating the plan can be a simple process or a complex process. It depends on factors such as the registrant, the complexity of the disability or health condition, and the activity within the program. Some plans are in writing (more complex) and others are not, for example, providing staff with extra training.

The city can streamline this process by developing a list of modifications it will always do, such as changes to rules and policies, and a list of modifications it will never do, such as providing medical supports in a program (note...these are just intended as examples). Both lists evolve with every court decision and settlement agreement.

We do urge the city, in establishing these lists, to err on the side of providing more, not less, supports. For federal court guidance see [Burriola vs Greater Toledo YMCA](#), [Anderson vs Little League](#), and [US vs NISRA](#).

Recommendation 12: Once a plan exists, **train the staff** that are necessary for the effective support of the registrant. (Consistent with US DOJ guidance)

Staff training regarding the plan is essential. It may be a simple training event, where the Manager of Inclusion reminds the staff conducting the program to be more attentive to a registrant, or to assist with transitions from activity to activity. It may also be a complex event, such as reviewing a behavior management plan with a one-on-one staff assigned to the registrant.

The Manager of Inclusion should document training events and content for risk management purposes. Documentation of training can be a critical risk management tool for the city.

Do remember to protect the privacy of the registrant. Arizona statutes and the ADA require the city to protect the privacy of people with disabilities who request and receive a reasonable modification.

Recommendation 13: During the assessment, planning, and training phases, **maintain contact** with the person who requested the modification, and his or her family. This is a smart practice.

Communication is essential to trust, and therefore, it is essential to the inclusion process. The Manager of Inclusion should keep the registrant, or the family of the registrant, apprised of achievement of steps in the process. Notify them when the assessment is complete, or a plan is developing, or a plan is being introduced to the employees who will implement the plan.

We recommend that the Manager of Inclusion maintain a communication log, noting emails, calls, visits, and other communications. This will help with planning for resource allocations. However, it is also an effective risk management tool.

Recommendation 14: Implement the plan. This is consistent with 35.130.

Those who know the plan, implement the plan. This is the step where all of the preparation, the assessment, training, and the skill of the Manager of Inclusion is tested.

It is also a test of program staffs. If part-time staffs are involved, how will they perform? Who trained the volunteers that are involved, and was the training effective? Are other career program staff at the city aware of the plan and supportive?

Recommendation 15: Evaluate the way in which city staffs implement the plan. This is a smart practice.

This is the final step in the eight-step inclusion process. The city should develop both formative and summative evaluation tools.

Additional Recommendations for the City
--

Recommendation 16: Have the ADA Coordinator or Manager of Inclusion maintain a record of all requests for reasonable modification, showing pertinent information and the status of the request.

Recommendation 17: Modify agendas for city staff meetings to always include “accessibility and inclusion of people with disabilities”. Assure that annual city reports address access and inclusion. Talk about the costs, benefits, and challenges of access and inclusion. It is a simple truth: the more often staffs discuss these topics, the sooner every employee gets the message that this is the mission of the City of Chandler.

Recommendation 18: Modify staff job descriptions to include a requirement that staffs support accessibility and the inclusion of people with disabilities.

Recommendation 19: Modify performance evaluations to reflect how well the employee has supported accessibility and the inclusion of people with disabilities.

Recommendation 20: Develop training initiatives for career staff who engage with the public. Training is an effective tool and will result in increased awareness by city staff of the ADA requirements.

Recommendation 21: Several US Department of Justice (US DOJ) Settlement Agreements involve policing issues. Identify and review two, and offer these as internal staff and officer training tools for city public safety staffs.

Recommendation 22: Review the US DOJ [training materials](#) intended for law enforcement staffs. Titled “Information for Law Enforcement”, these materials include interview tips and techniques, and other information that gives law enforcement officers the tools to deal with people with disabilities.

Recommendation 23: Propose the establishment of a common budget line item to support inclusion and accessibility, shared by all city departments, funding the cost of supports pursuant to requests for reasonable modifications. This is a critical issue. In our experience, when the cost of modifications must come out of a program budget, that program manager is less likely to say yes to the request.

Recommendation 24: Images are important. In city print and online materials, strive for the use of images of people with disabilities. There is no formal guidance on the ratio, but we would recommend that one of every ten images include a person with a disability.

Recommendation 25: Adopt a policy that compels designers and contractors to adhere to the 2010 Standards and Arizona requirements (consistent with 35.151).

Recommendation 26: Require contractual program providers to make modifications (consistent with 35.130(b)(1)). Add this requirement to contractual agreements.

Recommendation 27: Use people-first language and replace the word “handicapped” in all documents with the term “people with disabilities”.

Recommendation 28: Do not use the term “reasonable accommodation” unless it is in reference to employment. The proper term to use regarding parks, facilities, programs, and policies is “reasonable modification.”

Recommendation 29: Maintain consistent communication with organizations that both serve or represent people with disabilities. In our experience, the cities that work more closely with their communities of people with disabilities find more support for compliance initiatives.

Conclusion

Chandler has excellent venues and services. Under the direction of a committed Mayor and Council, the professional and compassionate staff successfully addresses access and inclusion requests already.

Policies play a critical role in the delivery of city services. Policies that properly frame how the city sees people with disabilities are more likely to result in programs and facilities that are accessible to and usable by people with disabilities.

Implementing these recommendations in the next several years will allow for optimal use of city resources for decades to come. When in doubt, lean to more access, or a yes, instead of less access, or a no. The city cannot find trouble by doing more than it should, but can find trouble by doing less than it should.

The recommendations in this report are intended to make what is already good, better. If we can clarify our recommendations, please reach me at john.mcgovern@rac-llc.com or by phone at 224-293-6451. It has been an honor to work with your team.

Prepared and Submitted by



John N. McGovern, JD
Partner, Principal-in-Charge
WT Group Accessibility Practice



APPENDIX D: ACCESS AND INCLUSION SOLUTIONS PROCESS

CITY OF CHANDLER, ARIZONA

Access and Inclusion Solutions Process

Introduction

The City of Chandler (City) intends that programs, services, parks, and facilities will be accessible to and inclusive of people with disabilities. Towards that end, the City makes reasonable modifications to enable and support participation by persons with disabilities in City programs, services, parks, and facilities.

ADA Coordinator

Title II 35.107 requires the appointment of a “responsible person” to coordinate ADA compliance for entities with 50 or more employees. The City employs more than 50 persons, and it names Jason Crampton as the City ADA Coordinator. He can be reached at 480-782-3440 or ada.coordinator@chandleraz.gov.

Solution Process Requirements

The City recognizes that people with disabilities may have specific preferences and priorities, and we invite discussions about same. The Solutions Process described below invites discussion and encourages solutions.

1. A person with a disability should, in writing, describe how, when (day and time), and where inadequate access to a City park, program, policy, or facility occurred.
2. A written request for solution (RFS) is preferred. However, an oral request for solution made by phone or in a face-to-face conversation, will be considered as received.
3. The City commits to allow alternative means of filing an RFS.
4. The City commits to a prompt and effective solution.
5. The City agrees that a solution that is not acceptable to the submitter may be appealed to the City Manager or his or her designee.
6. The City will maintain records related to a RFS for a length of time that satisfies Arizona public records retention requirements.

Appendix D: Access and Inclusion Solutions Process
Provided to the City of Chandler
August 7, 2020 page 2

7. This Solutions Process is applicable to all City programs, services, parks, and facilities. This Solution Process is also posted in all City facilities open to the public, as well as in City facilities that are used only by employees.
8. The Solution Process is available in alternative formats for persons with disabilities. Contact: ada.coordinator@chandleraz.gov.

Solution Process Steps

This Access and Inclusion Solutions Process is established to meet the requirements of the Americans with Disabilities Act of 1990 ("ADA"). It may be used by anyone who believes that a City program, service, park, or facility is not available to them because of their disability. The Solutions Process does not apply to human resources issues, such as the relationship between the City and its employees. The City personnel policies govern those issues.

Step 1: Make a Written Request for Solution

The Request for Solution should be in writing and contain information about issue requiring a solution. The information can include the name, address, email, and phone number of the person seeking a solution, and location, date, and a brief description of the issue requiring a solution.

The City will accept, upon request by a person with a disability, alternative means of requesting a solution, such as conducting personal interviews or accepting a tape or voice file of the request.

The Request for Solution should be submitted by the person with a disability and/or his/her designee as soon as possible but no later than 60 calendar days after the date on which the issue arose or occurred.

The Request for Solution should be submitted to:

Jason Crampton
ADA Coordinator/Transportation Planning Supervisor
City of Chandler – City Hall
175 S. Arizona Avenue, 4th Floor
480-782-3440
[email: ada.coordinator@chandleraz.org](mailto:ada.coordinator@chandleraz.org)

Step 2: Schedule a Meeting

Within 3 calendar days after receipt of the request for solution, the ADA Coordinator or designee will schedule a meeting, in-person or virtually, with the person seeking a solution to discuss the request for solution and the possible solutions.

Appendix D: Access and Inclusion Solutions Process
Provided to the City of Chandler
August 7, 2020 page 3

The schedule communications may occur by phone, by text, in person, or by email. The meeting shall occur within 10 calendar days after receipt of the request for solution.

Step 3: Meeting to Discuss the Request for Solution

Within 10 calendar days after receipt of the request for solution, the ADA Coordinator or designee will meet with the person seeking a solution to discuss the request for solution and the possible solutions.

The person requesting a solution may bring other persons to the meeting, such as a family member, friend, coworker, advocate, or attorney, but shall provide notice to the ADA Coordinator or designee regarding the number of persons to attend and their relationship to the person seeking a solution.

Step 4: Provide a Solution

Within 10 calendar days of the meeting, the ADA Coordinator or designee will provide a written decision regarding the request for solution, and where appropriate, in a format accessible to the person seeking the solution, such as large print, Braille, or audio tape.

The response will explain the position of the City and offer a solution to the request for solution. There may be times where more than one solution will be effective, and if so, the written response will describe the possible solutions.

Step 5: Appealing a Request for Solution Decision

If the response by the ADA Coordinator or designee does not satisfy the person seeking a solution, they or their designee may appeal the decision to the City Manager or designee within 5 calendar days after receipt of the response. An appeal made later than 5 calendar days after the receipt of the response will not be considered.

Within 15 calendar days after receipt of the appeal, the City Manager or designee will meet with the appellant to discuss the appeal and the original decision regarding the request for solution.

Within 15 calendar days after the meeting, the City Manager or designee will respond in writing, and, where appropriate, in a format accessible to the appellant, with a final resolution of the appeal.

Process Costs

The City will absorb the costs of staff time and consultants that become involved in this process. The person requesting a solution or appealing a request for solution decision will absorb all costs incurred by them in the process.

Appendix D: Access and Inclusion Solutions Process
Provided to the City of Chandler
August 7, 2020 page 4

Implementation Costs

Depending on the solution, some, none, or all of the costs of implementing the solution may be absorbed by the City. The City understands and abides by the title II 35.130(f) prohibition on the making of surcharges to persons with disabilities for the cost of reasonable modifications.

Records

All Requests for Solutions received by the ADA Coordinator or designee, appeals to the City Manager, and responses from these two offices will be retained by the City for at least a length of time that satisfies Arizona public records retention requirements, but not less than three years.

Other Solutions May Be Sought

The City believes an internal solution is an effective approach to accessibility and inclusion issues, offering more flexibility to all persons and to the City. That said, other solutions may be sought. A person with a disability may seek a solution through the US Department of Interior Office of Civil Rights, the US Department of Justice, or proceed directly to Federal District Court.

Information

The City of Chandler is committed to access and inclusion and believes that both make Chandler a better community. To discuss access and inclusion initiatives, reach the ADA Coordinator at ada.coordinator@chandleraz.gov.



APPENDIX E: SAMPLE SERVICE ANIMAL POLICY

SAMPLE SERVICE ANIMAL POLICY

Drafted for the City of Chandler
January 31, 2020

Prepared by John N. McGovern, J.D.
Partner, Principal-in-Charge
The WT Group, LLC Accessibility Practice

Introduction

One of the key elements of the amended title II regulation requires municipalities, counties, and states to allow persons with disabilities to bring service animals into areas of parks and facilities where pedestrians are allowed. Found at section 35.136, this broad requirement became effective March 15, 2011.

Assessment Factors

The DOJ requires you to use these assessment factors for a service animal that is a dog.

(d) *Animal under handler's control.* A service animal shall be under the control of its handler. A service animal shall have a harness, leash, or other tether, unless either the handler is unable because of a disability to use a harness, leash, or other tether, or the use of a harness, leash, or other tether would interfere with the service animal's safe, effective performance of work or tasks, in which case the service animal must be otherwise under the handler's control (e.g., voice control, signals, or other effective means).

The service animal may also be a miniature horse. In that event the assessment can include the following factors:

- (2) *Assessment factors.* In determining whether reasonable modifications in policies, practices, or procedures can be made to allow a miniature horse into a specific facility, a public entity shall consider—
 - (i) The type, size, and weight of the miniature horse and whether the facility can accommodate these features;
 - (ii) Whether the handler has sufficient control of the miniature horse;
 - (iii) Whether the miniature horse is housebroken; and
 - (iv) Whether the miniature horse's presence in a specific facility compromises legitimate safety requirements that are necessary for safe operation.

Inquiries are Limited to...

DOJ has anticipated that inquiries will arise. They are limited to the following excerpted section of the regulation.

(f) *Inquiries.*

A public entity shall not ask about the nature or extent of a person's disability, but may make two inquiries to determine whether an animal qualifies as a service animal.

A public entity may ask 1) if the animal is required because of a disability and 2) what work or task the animal has been trained to perform.

A public entity shall not require documentation, such as proof that the animal has been certified, trained, or licensed as a service animal.

Generally, a public entity may not make these inquiries about a service animal when it is readily apparent that an animal is trained to do work or perform tasks for an individual with a disability (e.g., the dog is observed guiding an individual who is blind or has low vision, pulling a person's wheelchair, or providing assistance with stability or balance to an individual with an observable mobility disability).

Model Policy Elements

**City of Chandler
Service Animal Policies
Effective Month, xx, 202x**

I. Introduction

The City, through these policies, intends to address compliance with the Americans with Disabilities Act (the "ADA") and Section 504 of the 1973 Rehabilitation Act ("Section 504"). The following procedures implement this policy with regard to the use of service animals by persons with disabilities who are registered participants in City programs or authorized users of City parks and facilities, by City employees with disabilities, and by visitors with disabilities in City parks and facilities.

The purpose of these procedures is to ensure that participants and authorized users, employees, and visitors with disabilities who have service animals can participate in and benefit from City of Chandler services, programs, and activities, and to ensure that the City does not discriminate on the basis of disability as identified in Titles I and II of the ADA.

II. Primary City of Chandler Contacts

- A. **Participants and authorized users** may have a service animal accompany them in parks and facilities where they are authorized users as a reasonable modification. Persons with disabilities are invited to contact the City of Chandler's ADA Coordinator at ada.coordinator@chandleraz.gov or (480) 782-3440.
- B. **Employees** may have a service animal as a workplace accommodation. Please contact the City of Chandler Human Resources Department for information regarding this process.
- C. **Visitors** may be accompanied by a service animal when observing programs and activities, or enjoying City parks and facilities, as a reasonable modification. Persons with disabilities are invited to contact the City of Chandler's ADA Coordinator at ada.coordinator@chandleraz.gov or (480) 782-3440 for any questions about this policy.

III. Definitions

- A. **Service Animal:** A **dog** or a **miniature horse** that has been individually trained to perform tasks for the benefit of a person with a disability. Exceptions may be made by the City on a case-by-case basis in accordance with the law. Tasks may include, but are not limited to, guiding individuals with impaired vision, alerting individuals with impaired hearing to sounds, pulling a wheelchair, calming a person with post-traumatic stress disorder, or retrieving dropped items.

Dogs or miniature horses that are not trained to perform tasks that mitigate the effects of a disability, including dogs or miniature horses that are used purely for emotional support, are not considered service animals and are not allowed at City of Chandler parks and facilities, unless otherwise specifically permitted, such as at the dog park or equestrian facility.

- B. **Partner/Handler:** A person with a disability who uses a service animal as a reasonable modification, or a trainer.
- C. **Team:** A partner/handler and a service animal. The two work as a cohesive team in accomplishing the tasks of daily living.
- D. **Trainee:** A dog or a miniature horse being trained to become a service animal has the same rights as a fully trained service animal when accompanied by a partner/handler and identified as such.

IV. General Rule Regarding Service Animals

As a general rule, the City of Chandler will modify policies, practices, and procedures to permit the use of a service animal by an individual with a disability.

V. Restrictions/Areas of Safety

The City may impose some restrictions on service animals for safety reasons. These restrictions are considered individually to determine if the animal poses a danger to others at City sites, or could be in danger itself, and to determine if other reasonable modifications can be provided to assure that the individual enjoys access to the park, facility, or program.

Questions about restrictions on service animals should be directed to the contacts listed in Section II.

VI. Responsibilities of Individuals Using Service Animals

An individual with a service animal is responsible for the following:

- A. Responding truthfully to the limited and appropriate inquiries that may be made by employees regarding the service animal.
- B. Ensuring that the animal meets any local licensing requirements, including maintenance of required immunizations for that type of animal.
- C. Service animal dogs are required to wear a dog license tag at all times.

- D. Partners/handlers must ensure that the animal is in a harness or on a leash or tether at all times. Exceptions may be considered individually and require the demonstration of control of the service animal by the handler.
- E. Partners/handlers must ensure that the animal is under control and behaves properly at all times. The supervision of the animal is solely the responsibility of its partner/handler. If the animal's behavior results in a hygiene problem, or the animal acts in a threatening manner, the City may require the partner/handler to remove the service animal from the site.
- F. Partners/handlers must ensure that all local ordinances or other laws regarding cleaning up after the animal defecates are strictly adhered to. Individuals with disabilities who cannot clean up after their own animals are not required to pick up and dispose of feces; however, these individuals should use marked service animal toileting areas where provided.
- G. Partners/handlers must keep the service animal in good health. If the service animal becomes ill, the partner/handler must remove it from the area. If such action does not occur, City of Chandler staff may require it to leave.
- H. The City may exclude a service animal from all parts of its property if a partner/handler fails to comply with these restrictions, and in failing to do so, fundamentally alters the nature of programs, services, or activity offered by the City.
- I. The City may exclude a service animal from all parts of its property if a partner/handler fails to control the behavior of a service animal and it poses a threat to the health or safety of others.

VII. Requirements for City of Chandler Staff, Registrants, and Visitors

Members of the City of Chandler staff, participants and authorized users, and visitors in City sites, are responsible for the following:

- A. Allow service animals to accompany the partner/handler at all times and anywhere at a site except where animals are specifically prohibited.
- B. Refrain from distracting a service animal in any way. Do not pet, feed, or interact with the animal without the partner/handler's invitation to do so.
- C. Shall not separate a partner/handler from a service animal.
- D. The City may take disciplinary action against any individual who fails to abide by these guidelines.

VIII. Temporary Exclusion of Service Animals

A participant or authorized user, employee, or visitor may report a concern regarding a service animal to City staff.

- A. Temporary Exclusion of a Service Animal Used by a Participant or Visitor:
 - 1. In response to an immediate concern, City staff may determine that a service animal must be temporarily removed from parks, sites, or facilities. The employee authorized to make such decisions at that site, park, or facility shall notify the

participant or visitor of this decision and that the incident will be reported immediately to the City of Chandler ADA Coordinator. The employee shall then report the incident to the ADA Coordinator.

2. The ADA Coordinator (or designee) will investigate all reported concerns and incidents where service animals have been temporarily removed from sites, parks, and facilities. The ADA Coordinator (or designee) will consult with appropriate City of Chandler personnel and determine whether or not the animal should be excluded from sites, parks, and facilities for an extended period of time, or permanently. The ADA Coordinator (or designee) will notify the participant, authorized user, or visitor of his or her decision.
3. If it is appropriate for the service animal to be excluded from sites, parks, or facilities permanently, the ADA Coordinator (or designee) will work with other City staff to ensure the participant, authorized user, or visitor receives appropriate reasonable modifications in place of the use of a service animal.
4. A participant, authorized user, or visitor who does not agree with the decision regarding removal from the premises may file an accessibility complaint. The City of Chandler's ADA Access and Inclusion Solutions Process is at <https://www.chandleraz.gov/accessibility-policy>.

B. Temporary Exclusion of an Employee's Service Animal:

1. In response to an immediate concern regarding lack of control of a service animal, or lack of bowel or bladder control by a service animal, the City of Chandler Human Resources Department may determine that a service animal must be temporarily removed from sites, parks, or facilities. The Human Resources Department Director (or designee) shall notify the employee of this decision and that the incident will be reported immediately to the ADA Coordinator. The Human Resources Department Director (or designee) shall then report the incident to the City of Chandler ADA Coordinator.
2. The ADA Coordinator will investigate all reported concerns and cases where service animals have been temporarily removed from sites, parks, and facilities. The ADA Coordinator will consult with appropriate staff and determine whether or not the animal should be excluded for an extended period of time or permanently. The ADA Coordinator shall notify the employee of his or her decision.
3. If it is appropriate for the animal to be excluded from sites, parks, and facilities permanently, the ADA Coordinator will ensure the employee receives appropriate accommodations in place of the use of a service animal.
4. An employee who does not agree with the resolution may file an appeal or formal complaint following the ADA Process.

IX. Conflicting Disabilities

Individuals with medical issues (such as respiratory diseases) who are affected by animals should contact the ADA Coordinator or Human Resources if they have a concern about exposure to a service animal. The individual will be asked to provide medical documentation that identifies a disability and the need for a modification. The appropriate

City of Chandler staff will facilitate a process to resolve the conflict that considers the needs and conditions of all persons involved.

X. Clarifying an Animal's Status

A service animal is not required to wear a cape, vest, or other symbols. It may not be easy to discern whether or not an animal is a service animal by observing the animal's conduct, or the partner or handler. However, in other cases, an animal may only have a leash, and in still other situations, the partner/handler's disability is not apparent. Therefore, it may be appropriate for designated City of Chandler staff such as facility managers, site directors, area staff, or administrative staff to ask (1) whether the animal is required because of a disability, and (2) what work or task the animal has been trained to perform.

XI. Emergency Situations

Emergency Responders (ERs) are trained to recognize service animals and to be aware that animals may try to communicate the need for help. Also, an animal may become disoriented from the smell of smoke in a fire or facility emergency, or from sirens, wind noise, or shaking and moving ground.

A partner/handler, service animal, and team may be confused in any stressful situation. ERs will remember that animals may be trying to be protective and, in its confusion, should not be considered harmful. ERs should make every effort to keep a service animal with its partner/handler; however, the ER's first effort should be toward the partner/handler, which may result in the animal being left behind in some emergency evacuation situations.

Conclusion

Service animals are an important support for people with a wide range of disabilities and health conditions. Consistent with the City of Chandler belief that programs, parks, and facilities should be accessible to and usable by all, this policy assures that people with disabilities can safely enjoy all that the City of Chandler has to offer.



APPENDIX F: PARKS AND FACILITIES TRANSITION PLAN SUMMARY



CITY OF CHANDLER

PARKS AND FACILITIES TRANSITION PLAN SUMMARY

November 2020

Sum of Cost multiplier based on year (3% increase each year for inflation)					
Site Name	FY 21	FY 22	FY 23	FY 24	FY 25
Airport		\$1,909.62		\$2,335.43	
AJ Chandler Park			\$218,851.36		
Amberwood Park					
Apache Park					
Arbuckle Park					
Armstrong Park					
Armstrong Yard - Fleet Services					
Armstrong Yard-Sts & Traffic					
Armstrong Yard-Waste & Wastewater					
Arrowhead Meadows Park					
Ashley Trail					
ASU Chandler Innovation Ctr	\$16,191.60				
Basha Library	\$40,912.42				
Bear Creek Golf Complex		\$78,365.40			
Blue Heron Park					
Boys & Girls Club-East Valley			\$195,760.54		
Brooks Crossing					
Centennial Park					
Center for the Arts					
Chandler City Hall Complex					\$208,008.61
Chandler Fire HQ					
Chandler Water Treatment Facility					
Chuckwalla Park					
Chuparosa Park					



**CITY OF CHANDLER
PARKS AND FACILITIES TRANSITION PLAN SUMMARY
November, 2020**

Sum of Cost multiplier based on year (3% increase each year for inflation)					
Site Name	FY 21	FY 22	FY 23	FY 24	FY 25
Community Center				\$11,536.47	
Crossbow Park					
Desert Breeze Park					
Desert Breeze Substation					
Dobson Park					
Downtown Biz Dist (pilot)					
DOWNTOWN BIZ DISTRICT WEST (pilot)					
Downtown Campus					
East Mini Park					
Enviromental Ed. Ctr	\$48,602.93				
Espee Park					
Facilities Service Center					
Family Investment Center			\$40,485.10		
Fire Mechanical Maint.					
Fire Station 1					
Fire Station 10					
Fire Station 2					
Fire Station 3					
Fire Station 4					
Fire Station 5					
Fire Station 6					
Fire Station 7					
Fire Station 8					
Fire Station 9					
Fire Training Facility					



**CITY OF CHANDLER
PARKS AND FACILITIES TRANSITION PLAN SUMMARY
November, 2020**

Sum of Cost multiplier based on year (3% increase each year for inflation)					
Site Name	FY 21	FY 22	FY 23	FY 24	FY 25
Folley Park					\$141,876.60
Fox Crossing Park					
Gazelle Meadows					
Hamilton Library	\$25,180.56				
Harmony Hollow Park					
Harris Park					
Harter Park					
Hoopes Park					
Information Technology Dept					
Jackrabbit Park					
La Paloma Park					
Los Altos Park					
Los Arboles Park					
Maggio Ranch Park					
Main Library					
McCullough-Price House and Museum	\$19,773.53				
Mountain View Park					
Municipal Courts				\$11,986.67	
N CENTRAL DR (pilot)					
N HARTFORD ST (pilot)					
Navarrete Park					
Nozomi Park				\$115,719.19	
Ocotillo Water Reclamation					
Park Manors					
Paseo Trail					



CITY OF CHANDLER
PARKS AND FACILITIES TRANSITION PLAN SUMMARY
 November, 2020

Sum of Cost multiplier based on year (3% increase each year for inflation)

Site Name	FY 21	FY 22	FY 23	FY 24	FY 25
Paseo Vista Recreation Area					
Pecos Ranch Park					
Pequeno Park					
Pima Park					
Pine Shadows Park					
Pinelake Park					
Police Station		\$2,864.43		\$67,643.08	
Price Park					
Provinces Park					
Pueblo Alto Park					
Quail Haven Park					
RAY RD & ALMA SCHOOL RD (pilot)					
Recycling & Solid Waste Collection Ctr					
Reverse Osmosis Facility					
Richard T. Felix Property and Evid. Bldg.					
Roadrunner Park					
Ryan Park					
San Marcos Park					
San Tan Park					
Senior Center					
Shawnee Park					
Snedigar Park					
South Police Substation					
Stonegate Park					
Summit Point Park					



**CITY OF CHANDLER
PARKS AND FACILITIES TRANSITION PLAN SUMMARY
November, 2020**

Sum of Cost multiplier based on year (3% increase each year for inflation)					
Site Name	FY 21	FY 22	FY 23	FY 24	FY 25
Sundance Park					
Sunset Library		\$5,728.86			
Sunset Park					
Thude Park					
Tibshraeny Family Park					
Transit Station - Chandler Mall					
Transit Station - Snedigar					
Transit Station - Tumbleweed				\$2,363.57	
Transportation and Development Bldg					
Tumbleweed Park		\$164,444.80		\$233,088.37	
Valencia Park					
Veterans Oasis Park					
W CHANDLER (pilot)					
West Police Substation					
Windmills West Park					
Xeriscape Demonstration Garden					\$1,344.76
Grand Total	\$314,297.14	\$253,313.12	\$455,097.01	\$444,672.77	\$351,229.97



**CITY OF CHANDLER
PARKS AND FACILITIES TRANSITION PLAN SUMMARY
November, 2020**

Sum of Cost multiplier based on year (3% increase each year for inflation)					
Site Name	FY 26	FY 27	FY 28	FY 29	FY 30
Airport					
AJ Chandler Park					
Amberwood Park					
Apache Park					
Arbuckle Park					
Armstrong Park					
Armstrong Yard - Fleet Services					
Armstrong Yard-Sts & Traffic					
Armstrong Yard-Waste & Wastewater					
Arrowhead Meadows Park					
Ashley Trail					
ASU Chandler Innovation Ctr					
Basha Library					
Bear Creek Golf Complex					
Blue Heron Park					
Boys & Girls Club-East Valley					
Brooks Crossing					
Centennial Park					
Center for the Arts					
Chandler City Hall Complex					
Chandler Fire HQ					\$77,825.66
Chandler Water Treatment Facility					
Chuckwalla Park					
Chuparosa Park					



**CITY OF CHANDLER
PARKS AND FACILITIES TRANSITION PLAN SUMMARY
November, 2020**

Sum of Cost multiplier based on year (3% increase each year for inflation)					
Site Name	FY 26	FY 27	FY 28	FY 29	FY 30
Community Center					
Crossbow Park					
Desert Breeze Park		\$380,531.58			
Desert Breeze Substation					
Dobson Park					
Downtown Biz Dist (pilot)					
DOWNTOWN BIZ DISTRICT WEST (pilot)					
Downtown Campus					
East Mini Park					
Enviromental Ed. Ctr					
Espee Park	\$125,687.14				
Facilities Service Center					
Family Investment Center					
Fire Mechanical Maint.					
Fire Station 1			\$59,310.18		
Fire Station 10					\$105,670.23
Fire Station 2				\$171,598.55	
Fire Station 3					\$150,449.13
Fire Station 4					
Fire Station 5				\$84,404.21	
Fire Station 6					
Fire Station 7					\$75,541.54
Fire Station 8			\$44,851.26		
Fire Station 9				\$120,427.96	
Fire Training Facility					



**CITY OF CHANDLER
PARKS AND FACILITIES TRANSITION PLAN SUMMARY
November, 2020**

Sum of Cost multiplier based on year (3% increase each year for inflation)					
Site Name	FY 26	FY 27	FY 28	FY 29	FY 30
Folley Park					
Fox Crossing Park					
Gazelle Meadows					
Hamilton Library					
Harmony Hollow Park					
Harris Park					
Harter Park					
Hoopes Park					
Information Technology Dept					
Jackrabbit Park					
La Paloma Park					
Los Altos Park					
Los Arboles Park					
Maggio Ranch Park					
Main Library					\$1,679.90
McCullough-Price House and Museum					
Mountain View Park					
Municipal Courts					
N CENTRAL DR (pilot)					
N HARTFORD ST (pilot)					
Navarrete Park					
Nozomi Park					
Ocotillo Water Reclamation					
Park Manors					
Paseo Trail					



**CITY OF CHANDLER
PARKS AND FACILITIES TRANSITION PLAN SUMMARY
November, 2020**

Sum of Cost multiplier based on year (3% increase each year for inflation)					
Site Name	FY 26	FY 27	FY 28	FY 29	FY 30
Paseo Vista Recreation Area	\$198,613.20				
Pecos Ranch Park					
Pequeno Park					
Pima Park			\$72,261.63		
Pine Shadows Park					
Pinelake Park					
Police Station					
Price Park					
Provinces Park					
Pueblo Alto Park					
Quail Haven Park					
RAY RD & ALMA SCHOOL RD (pilot)					
Recycling & Solid Waste Collection Ctr					
Reverse Osmosis Facility					
Richard T. Felix Property and Evid. Bldg.					
Roadrunner Park					
Ryan Park					
San Marcos Park					
San Tan Park					
Senior Center					
Shawnee Park					
Snedigar Park		\$248,278.33	\$981.75		\$503.97
South Police Substation					
Stonegate Park					
Summit Point Park					



**CITY OF CHANDLER
PARKS AND FACILITIES TRANSITION PLAN SUMMARY
November, 2020**

Sum of Cost multiplier based on year (3% increase each year for inflation)					
Site Name	FY 26	FY 27	FY 28	FY 29	FY 30
Sundance Park					
Sunset Library					\$0.00
Sunset Park					
Thude Park					
Tibshraeny Family Park					
Transit Station - Chandler Mall					
Transit Station - Snedigar					
Transit Station - Tumbleweed					
Transportation and Development Bldg					
Tumbleweed Park	\$205,017.59				
Valencia Park					
Veterans Oasis Park			\$57,968.12		
W CHANDLER (pilot)					
West Police Substation			\$163,006.82		
Windmills West Park					
Xeriscape Demonstration Garden				\$52,436.97	
Grand Total	\$529,317.92	\$628,809.91	\$398,379.75	\$428,867.69	\$411,670.42



**CITY OF CHANDLER
PARKS AND FACILITIES TRANSITION PLAN SUMMARY
November, 2020**

Sum of Cost multiplier based on year (3% increase each year for inflation)					
Site Name	FY 31	FY 32	FY 33	FY 34	FY 35
Airport		\$4,640.85			
AJ Chandler Park					
Amberwood Park				\$37,010.91	
Apache Park					
Arbuckle Park					
Armstrong Park					
Armstrong Yard - Fleet Services				\$121,358.10	
Armstrong Yard-Sts & Traffic					\$212,721.76
Armstrong Yard-Waste & Wastewater					
Arrowhead Meadows Park					
Ashley Trail					
ASU Chandler Innovation Ctr					
Basha Library					
Bear Creek Golf Complex					
Blue Heron Park					
Boys & Girls Club-East Valley					
Brooks Crossing				\$26,895.14	
Centennial Park					
Center for the Arts					
Chandler City Hall Complex					
Chandler Fire HQ					
Chandler Water Treatment Facility					
Chuckwalla Park					
Chuparosa Park	\$78,904.42				



**CITY OF CHANDLER
PARKS AND FACILITIES TRANSITION PLAN SUMMARY
November, 2020**

Sum of Cost multiplier based on year (3% increase each year for inflation)					
Site Name	FY 31	FY 32	FY 33	FY 34	FY 35
Community Center					
Crossbow Park				\$8,561.26	
Desert Breeze Park		\$219,909.36	\$991.26		
Desert Breeze Substation					
Dobson Park					
Downtown Biz Dist (pilot)					
DOWNTOWN BIZ DISTRICT WEST (pilot)					
Downtown Campus					
East Mini Park					
Enviromental Ed. Ctr					
Espee Park		\$68,700.29			
Facilities Service Center					
Family Investment Center					
Fire Mechanical Maint.					
Fire Station 1					
Fire Station 10					
Fire Station 2					
Fire Station 3					
Fire Station 4	\$236,102.68				
Fire Station 5					
Fire Station 6			\$72,886.27		
Fire Station 7					
Fire Station 8					
Fire Station 9					
Fire Training Facility					



**CITY OF CHANDLER
PARKS AND FACILITIES TRANSITION PLAN SUMMARY
November, 2020**

Sum of Cost multiplier based on year (3% increase each year for inflation)					
Site Name	FY 31	FY 32	FY 33	FY 34	FY 35
Folley Park		\$41,945.89			
Fox Crossing Park					
Gazelle Meadows					
Hamilton Library					
Harmony Hollow Park					
Harris Park					\$5,452.89
Harter Park					
Hoopes Park					
Information Technology Dept					
Jackrabbit Park					
La Paloma Park					
Los Altos Park				\$166.38	
Los Arboles Park					\$9,480.01
Maggio Ranch Park					
Main Library		\$19,661.24		\$2,798.29	
McCullough-Price House and Museum	\$64,258.75				
Mountain View Park					
Municipal Courts					
N CENTRAL DR (pilot)					
N HARTFORD ST (pilot)					
Navarrete Park					
Nozomi Park					
Ocotillo Water Reclamation					\$290,654.13
Park Manors				\$11,492.66	
Paseo Trail					\$21,462.56



CITY OF CHANDLER
PARKS AND FACILITIES TRANSITION PLAN SUMMARY
 November, 2020

Sum of Cost multiplier based on year (3% increase each year for inflation)					
Site Name	FY 31	FY 32	FY 33	FY 34	FY 35
Paseo Vista Recreation Area					
Pecos Ranch Park					
Pequeno Park					
Pima Park					
Pine Shadows Park					
Pinelake Park					
Police Station		\$2,887.17			
Price Park				\$50,796.65	
Provinces Park					
Pueblo Alto Park					
Quail Haven Park					
RAY RD & ALMA SCHOOL RD (pilot)					
Recycling & Solid Waste Collection Ctr			\$94,045.74		
Reverse Osmosis Facility					
Richard T. Felix Property and Evid. Bldg.					
Roadrunner Park				\$71,554.57	
Ryan Park					
San Marcos Park					
San Tan Park					
Senior Center					
Shawnee Park					
Snedigar Park		\$103,681.33	\$4,016.44		
South Police Substation			\$135,862.11		
Stonegate Park					
Summit Point Park				\$18,619.98	



**CITY OF CHANDLER
PARKS AND FACILITIES TRANSITION PLAN SUMMARY
November, 2020**

Sum of Cost multiplier based on year (3% increase each year for inflation)					
Site Name	FY 31	FY 32	FY 33	FY 34	FY 35
Sundance Park					\$38,634.48
Sunset Library		\$2,495.08			
Sunset Park					
Thude Park					
Tibshraeny Family Park				\$172,324.81	
Transit Station - Chandler Mall					
Transit Station - Snedigar					
Transit Station - Tumbleweed					
Transportation and Development Bldg					
Tumbleweed Park					
Valencia Park					
Veterans Oasis Park					
W CHANDLER (pilot)					
West Police Substation					
Windmills West Park					
Xeriscape Demonstration Garden					
Grand Total	\$379,265.84	\$463,921.21	\$307,801.81	\$521,578.75	\$578,405.82



**CITY OF CHANDLER
PARKS AND FACILITIES TRANSITION PLAN SUMMARY
November, 2020**

Sum of Cost multiplier based on year (3% increase each year for inflation)					
Site Name	FY 36	FY 37	FY 38	FY 39	FY 40
Airport					
AJ Chandler Park					
Amberwood Park					
Apache Park			\$60,412.54		
Arbuckle Park	\$0.00				
Armstrong Park		\$16,855.74			
Armstrong Yard - Fleet Services					
Armstrong Yard-Sts & Traffic					
Armstrong Yard-Waste & Wastewater	\$277,569.74				
Arrowhead Meadows Park					
Ashley Trail			\$11,576.54		
ASU Chandler Innovation Ctr					
Basha Library					
Bear Creek Golf Complex					
Blue Heron Park					\$8,587.80
Boys & Girls Club-East Valley					
Brooks Crossing					
Centennial Park	\$29,956.66				
Center for the Arts					
Chandler City Hall Complex					
Chandler Fire HQ					
Chandler Water Treatment Facility		\$242,244.94			
Chuckwalla Park					\$15,044.91
Chuparosa Park					



**CITY OF CHANDLER
PARKS AND FACILITIES TRANSITION PLAN SUMMARY
November, 2020**

Sum of Cost multiplier based on year (3% increase each year for inflation)					
Site Name	FY 36	FY 37	FY 38	FY 39	FY 40
Community Center					
Crossbow Park					
Desert Breeze Park					
Desert Breeze Substation					
Dobson Park		\$15,037.61			
Downtown Biz Dist (pilot)					
DOWNTOWN BIZ DISTRICT WEST (pilot)					
Downtown Campus					
East Mini Park	\$4,557.37				
Enviromental Ed. Ctr					
Espee Park					
Facilities Service Center			\$103,414.64		
Family Investment Center					
Fire Mechanical Maint.				\$114,795.03	
Fire Station 1					
Fire Station 10					
Fire Station 2					
Fire Station 3					
Fire Station 4					
Fire Station 5					
Fire Station 6					
Fire Station 7					
Fire Station 8					
Fire Station 9					
Fire Training Facility					\$214,120.58



**CITY OF CHANDLER
PARKS AND FACILITIES TRANSITION PLAN SUMMARY
November, 2020**

Sum of Cost multiplier based on year (3% increase each year for inflation)					
Site Name	FY 36	FY 37	FY 38	FY 39	FY 40
Folley Park					
Fox Crossing Park			\$17,638.86		
Gazelle Meadows				\$17,215.92	
Hamilton Library					
Harmony Hollow Park					
Harris Park					
Harter Park				\$78,004.97	
Hoopes Park		\$73,181.95			
Information Technology Dept					\$104,663.32
Jackrabbit Park				\$38,243.97	
La Paloma Park			\$14,160.84		
Los Altos Park					
Los Arboles Park					
Maggio Ranch Park	\$28,279.51				
Main Library					
McCullough-Price House and Museum					
Mountain View Park			\$22,948.80		
Municipal Courts					
N CENTRAL DR (pilot)					
N HARTFORD ST (pilot)					
Navarrete Park				\$48,958.49	
Nozomi Park					
Ocotillo Water Reclamation					
Park Manors					
Paseo Trail					



**CITY OF CHANDLER
PARKS AND FACILITIES TRANSITION PLAN SUMMARY
November, 2020**

Sum of Cost multiplier based on year (3% increase each year for inflation)					
Site Name	FY 36	FY 37	FY 38	FY 39	FY 40
Paseo Vista Recreation Area					
Pecos Ranch Park		\$33,004.06			
Pequeno Park			\$35,415.47		
Pima Park					
Pine Shadows Park				\$17,535.06	
Pinelake Park					\$30,982.55
Police Station					
Price Park					
Provinces Park				\$17,744.48	
Pueblo Alto Park	\$27,461.11				
Quail Haven Park		\$8,407.33			
RAY RD & ALMA SCHOOL RD (pilot)					
Recycling & Solid Waste Collection Ctr					
Reverse Osmosis Facility	\$220,552.23				
Richard T. Felix Property and Evid. Bldg.		\$54,125.38			
Roadrunner Park					
Ryan Park					\$55,047.17
San Marcos Park	\$33,826.75				
San Tan Park		\$49,482.95			
Senior Center					
Shawnee Park			\$67,793.90		
Snedigar Park					
South Police Substation					
Stonegate Park					\$45,278.18
Summit Point Park					



**CITY OF CHANDLER
PARKS AND FACILITIES TRANSITION PLAN SUMMARY
November, 2020**

Sum of Cost multiplier based on year (3% increase each year for inflation)					
Site Name	FY 36	FY 37	FY 38	FY 39	FY 40
Sundance Park					
Sunset Library					
Sunset Park				\$20,793.07	
Thude Park					
Tibshraeny Family Park					
Transit Station - Chandler Mall					
Transit Station - Snedigar					
Transit Station - Tumbleweed					
Transportation and Development Bldg					
Tumbleweed Park					
Valencia Park		\$37,403.94			
Veterans Oasis Park					
W CHANDLER (pilot)					
West Police Substation					
Windmills West Park				\$38,380.74	
Xeriscape Demonstration Garden					\$198.67
Grand Total	\$622,203.37	\$529,743.90	\$333,361.59	\$391,671.73	\$473,923.18



**CITY OF CHANDLER
PARKS AND FACILITIES TRANSITION PLAN SUMMARY
November, 2020**

Sum of Cost multiplier based on year (3% increase each year for inflation)	
Site Name	
Airport	\$13,385.90
AJ Chandler Park	\$218,851.36
Amberwood Park	\$69,946.04
Apache Park	\$64,498.38
Arbuckle Park	\$15,512.28
Armstrong Park	\$20,769.68
Armstrong Yard - Fleet Services	\$121,926.83
Armstrong Yard-Sts & Traffic	\$214,180.01
Armstrong Yard-Waste & Wastewater	\$278,776.48
Arrowhead Meadows Park	\$134,290.00
Ashley Trail	\$32,022.77
ASU Chandler Innovation Ctr	\$16,191.60
Basha Library	\$41,299.70
Bear Creek Golf Complex	\$78,365.40
Blue Heron Park	\$12,365.15
Boys & Girls Club-East Valley	\$196,022.80
Brooks Crossing	\$82,211.67
Centennial Park	\$40,098.40
Center for the Arts	\$8,500.00
Chandler City Hall Complex	\$208,286.84
Chandler Fire HQ	\$79,599.63
Chandler Water Treatment Facility	\$243,487.88
Chuckwalla Park	\$17,601.12
Chuparosa Park	\$113,293.53



CITY OF CHANDLER
PARKS AND FACILITIES TRANSITION PLAN SUMMARY
November, 2020

Sum of Cost multiplier based on year (3% increase each year for inflation)	
Site Name	
Community Center	\$57,616.47
Crossbow Park	\$9,650.32
Desert Breeze Park	\$601,432.20
Desert Breeze Substation	\$20,000.00
Dobson Park	\$69,047.95
Downtown Biz Dist (pilot)	\$269,540.00
DOWNTOWN BIZ DISTRICT WEST (pilot)	\$250,000.00
Downtown Campus	\$56,330.00
East Mini Park	\$22,853.31
Enviromental Ed. Ctr	\$48,779.51
Espee Park	\$194,387.43
Facilities Service Center	\$103,414.64
Family Investment Center	\$40,895.96
Fire Mechanical Maint.	\$115,454.35
Fire Station 1	\$59,842.22
Fire Station 10	\$105,670.23
Fire Station 2	\$172,120.46
Fire Station 3	\$151,013.58
Fire Station 4	\$236,623.15
Fire Station 5	\$84,404.21
Fire Station 6	\$72,886.27
Fire Station 7	\$75,541.54
Fire Station 8	\$44,851.26
Fire Station 9	\$120,427.96
Fire Training Facility	\$214,120.58



**CITY OF CHANDLER
PARKS AND FACILITIES TRANSITION PLAN SUMMARY
November, 2020**

Sum of Cost multiplier based on year (3% increase each year for inflation)	
Site Name	
Folley Park	\$183,822.48
Fox Crossing Park	\$49,430.78
Gazelle Meadows	\$47,883.24
Hamilton Library	\$25,180.56
Harmony Hollow Park	\$51,697.29
Harris Park	\$5,452.89
Harter Park	\$83,616.19
Hoopes Park	\$86,603.08
Information Technology Dept	\$104,663.32
Jackrabbit Park	\$41,568.61
La Paloma Park	\$71,075.61
Los Altos Park	\$9,796.83
Los Arboles Park	\$16,366.23
Maggio Ranch Park	\$43,600.79
Main Library	\$80,559.43
McCullough-Price House and Museum	\$84,552.75
Mountain View Park	\$123,750.35
Municipal Courts	\$177,445.67
N CENTRAL DR (pilot)	\$58,170.00
N HARTFORD ST (pilot)	\$63,280.00
Navarrete Park	\$116,493.52
Nozomi Park	\$115,719.19
Ocotillo Water Reclamation	\$291,239.93
Park Manors	\$22,141.29
Paseo Trail	\$29,065.44



CITY OF CHANDLER
PARKS AND FACILITIES TRANSITION PLAN SUMMARY
November, 2020

Sum of Cost multiplier based on year (3% increase each year for inflation)	
Site Name	
Paseo Vista Recreation Area	\$204,643.16
Pecos Ranch Park	\$45,664.87
Pequeno Park	\$45,902.46
Pima Park	\$130,799.08
Pine Shadows Park	\$56,242.96
Pinelake Park	\$47,093.06
Police Station	\$193,394.68
Price Park	\$87,925.11
Provinces Park	\$75,504.97
Pueblo Alto Park	\$30,076.78
Quail Haven Park	\$19,552.24
RAY RD & ALMA SCHOOL RD (pilot)	\$31,250.00
Recycling & Solid Waste Collection Ctr	\$94,597.91
Reverse Osmosis Facility	\$223,280.23
Richard T. Felix Property and Evid. Bldg.	\$54,125.38
Roadrunner Park	\$73,490.68
Ryan Park	\$117,276.60
San Marcos Park	\$46,217.38
San Tan Park	\$82,736.83
Senior Center	\$32,493.00
Shawnee Park	\$147,946.88
Snedigar Park	\$357,461.81
South Police Substation	\$135,862.11
Stonegate Park	\$52,979.43
Summit Point Park	\$21,197.43



**CITY OF CHANDLER
PARKS AND FACILITIES TRANSITION PLAN SUMMARY
November, 2020**

Sum of Cost multiplier based on year (3% increase each year for inflation)	
Site Name	
Sundance Park	\$58,384.16
Sunset Library	\$8,223.94
Sunset Park	\$91,298.55
Thude Park	\$105,449.72
Tibshraeny Family Park	\$172,324.81
Transit Station - Chandler Mall	\$21,580.00
Transit Station - Snedigar	\$400.00
Transit Station - Tumbleweed	\$39,093.57
Transportation and Development Bldg	\$56,925.00
Tumbleweed Park	\$644,050.76
Valencia Park	\$39,519.59
Veterans Oasis Park	\$60,622.55
W CHANDLER (pilot)	\$100,000.00
West Police Substation	\$163,483.12
Windmills West Park	\$109,062.06
Xeriscape Demonstration Garden	\$85,190.00
Grand Total	\$11,975,351.48