

AMERICANS WITH DISABILITIES ACT (ADA)

SELF-EVALUATION AND TRANSITION PLAN



May 2022

ACKNOWLEDGEMENTS

Many leaders, staff, and community members took part in the development of this ADA Self-Evaluation and Transition Plan.

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1.0 EXECUTIVE SUMMARY

The City of Boise is committed to creating a city for everyone where people with disabilities have equal opportunity and meaningful access to resources, programs and services offered by the city. This ADA Self-Evaluation and Transition Plan provides a framework for the continuous improvements the City of Boise is taking to make its programs and facilities accessible for community members and visitors with disabilities.

This plan entails programmatic self-evaluations to ensure all activities, services, policies, and practices are discrimination-free and all facilities are barrier free. It is intended to be a living document that is regularly updated as programs and services change, as barriers are removed, new facilities are built, and input from community members is brought forward.

This plan outlines the strategy for the City of Boise to progress toward compliance with the Americans with Disabilities Act (ADA), identifying physical barriers for persons with disabilities, and a schedule to remove those barriers over time. Based on legal requirements, this plan must:

- List barriers
- Identify feasible solutions to each barrier
- Establish a timeline for removing barriers
- Identify the department responsible for compliance and implementation of this plan; and
- Involve people with disabilities to seek input

This plan includes the review of 30 facilities and one (1) design review of Arts & History's Erma Haymon House.

It is important to note that these efforts are on-going, and other facilities that are owned by the City of Boise but leased to other organizations, such as Boise Art Museum (BAM) and The Cabin, may be included as future iterations of this plan. Additionally, an accessibility review of the City of Boise's website as well as the Ridge to Rivers trail system will be future projects.

This plan also includes a summary of the city's programs as well as a summary of architectural barriers and proposed solutions for the city's facilities and parks/outdoor areas. For clarity, programmatic review was completed by city staff where architectural barriers were assessed by a consultant, Benesch (formally Tindale Oliver and Associates). Both programmatic and architectural reviews are designed to help move the city towards full compliance with its obligations under the Title II of the Americans with Disabilities Act (ADA) as well as progressing towards an inclusive and barrier-free organization. As the City of Boise does not generally oversee the public rights-of-way (PROW), such as sidewalks and curb cuts, PROW elements are not included in this report unless they are on city-owned facilities.

Many city-owned facilities that were recently altered or renovated are substantially accessible and meet most architectural requirements. Continued facility alterations, and/or renovations will significantly reduce barriers and realize City of Boise's commitment to inclusion and equal access. In the meantime, the greatest problems posed by existing barriers can be remedied by establishing policies and procedures to proactively include and accommodate members of the disability community. The city has taken several significant steps in this direction:

- Established an Accessible Parking Committee (APC) that operated from August 2017 to May 2021. The mission of the committee was to improve accessibility and access in Boise, particularly the downtown core. In partnership with the APC, an in-depth analysis was conducted with city staff in 2019 to begin remedying parking barriers.
- In early 2018, the City of Boise hired Ciera Garechana, the Community Accessibility Manager. This position is housed within the Office of Community Engagement, and dedicated to furthering accessibility.
- In 2019, City of Boise hired a consultant, Benesch (formally Tindale Oliver & Associates), to undertake its assessment of architectural barriers of public-facing city facilities.
- City of Boise launched a comprehensive accessibility survey to community members in the fall of 2020 to gauge public opinion and understand the community's priorities for accessibility.
- Throughout 2021, City of Boise has done multiple community engagements to gather input. Staff and community members with cross disabilities collectively reviewed facilities assessment reports to best prioritize barrier removals for what is most meaningful to people with disabilities.
- In fall of 2021, the city put together a Cross Disability Advisory Taskforce to collaborate with community leaders with cross disabilities to understand how we can move beyond legal requirements to improve the quality of life for people with disabilities living, working, and recreating in Boise.

Key Findings

This report found that many key facilities and outdoor areas are "functionally accessible," meaning that they are generally usable by people with disabilities. However, facilities are not in full compliance with current accessibility requirements. City Hall is an example of such a "functionally accessible" facility: most programs can be accessed by most people because the building features an accessible entrance, an elevator and has accessible routes throughout the building. Yet some restrooms have accessibility issues, nearby accessible parking stalls are not fully compliant, and many room signs do not have Braille or tactile components. Additionally, the Main Library is another example of a "functionally accessible" facility: most services can be accessible, yet the facility has several errors in accessible parking and numerous restrooms have accessibility issues.

2.0 LEGAL REQUIREMENTS

The ADA is a comprehensive civil rights law for people with disabilities. Its purpose is to provide a “clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities.” Congress emphasized that the ADA seeks to dispel stereotypes and assumptions about disabilities and to assure equality of opportunity, full participation, independent living, and economic self-sufficiency for people with disabilities. As a public entity, the City of Boise is subject to the ADA’s Title II Requirements for State and Local Government Programs and Services and is responsible for the provision of accessible programs and facilities that are available without discrimination toward people with disabilities. Programs offered by the City of Boise to the public must be accessible and free from barriers. Barriers include any obstacles that prevent or restrict the entrance to or use of a facility. Accessibility applies to all aspects of a program or service, including advertisement, eligibility, and participation.

Legal Overview

The City of Boise is obligated by 42 U.S.C. § 12101 et seq. and Idaho Code § 67-5909 concerning the rights of people with disabilities in the daily provision of programs, services, and activities. the daily provision of programs, services, and activities.

Federal Obligation: American with Disabilities Act (ADA)

Based on the 1964 Civil Rights Act and expanding upon the obligations set forth in Section 504 of the 1973 Rehabilitation Act, the 1990 ADA prohibits discrimination against people with disabilities. The ADA provides civil rights protections to individuals with disabilities similar to those afforded to individuals on the basis of race, color, sex, national origin, age, and religion. The cornerstone of Title II of the ADA, which applies to state and local governments, is clear: no qualified person with a disability may be excluded from participating in, or denied the benefits of, the programs, services, and activities provided by state and local governments because of a disability.

The 2008 Amendments to the ADA (ADAAA), signed into law on September 25, 2008, describes in more detail the range of conditions covered by the civil rights protections of the ADA. The amendments expand the definition of “disability” to include impairments that substantially limit a major life activity and states that when determining whether someone qualifies as having a disability, one cannot take into account assistive devices, auxiliary aids, accommodations, medical therapies and supplies. The amendments also address episodic disabilities that may go into remission but still can significantly limit a major life activity when active, such as epilepsy and post-traumatic stress disorder. The ADA defines a disability as:

- A physical or mental impairment that substantially limits one or more major life activities (i.e., working, talking, hearing, seeing, caring for oneself)

- Having a record of a physical or mental impairment that substantially limits one or more major life activities
- Being regarded by others as having an impairment such as individuals with severe facial scarring

It is important to note that the primary obligation to public entities such as the City of Boise, under Title II of the Americans with Disabilities Act, is to ensure that, when viewed in their entirety, the programs, services, and activities offered are equally available to people with disabilities. The city is required to follow the 2010 ADA Standards for Accessible Design in new construction and major alterations. The 2010 ADA Standards must also be used for corrective actions if existing conditions don't comply with the original ADA Accessibility Guidelines. Municipalities also must relocate programs or otherwise provide access to programs located in inaccessible older facilities (i.e., facilities built before the ADA went into effect January 26, 1992).

The websites of Title II entities are also considered "programs" and should be accessible to the standards of the Web Content Accessibility Guidelines 2.0 AA. An extensive and proper review of the City of Boise's website has not been scoped out, but it will be a future iteration of this plan and likely contracted with an experienced consultant.

The city must communicate effectively with people who have hearing, vision, or speech disabilities. City of Boise is also required to make reasonable modifications to policies, practices, and procedures where necessary to ensure the equal participation of people with disabilities.

Facilities that meet or exceed 1991 ADA Standards are not required to make changes to the new standards except in the case of significant renovation. For elements that are non-compliant, the corrective measures must align with the 2010 ADA Standards. It is not expected that the buildings will meet or be brought up to all of the 2010 ADA Standards absent significant or total renovation. State and local governments must ensure that individuals with disabilities are not excluded from services, programs, and activities because buildings are inaccessible. This means Title II entities need not remove physical barriers, such as stairs, in all existing buildings, as long as they make their programs accessible to individuals who are unable to use an inaccessible existing facility.

3.0 City of Boise Self-Evaluation of Non-Discriminatory Policies, Practices, Services and Activities

To more holistically research and assess the City of Boise's current programmatic state, city leadership decided that an internal resource, the Community Accessibility Manager, would generate more in-depth findings and best support ongoing improvements. The City of Boise's

Community Accessibility Manager worked with departments to undertake a comprehensive assessment of their policies, practices, and procedures to determine compliance with the requirements of the ADA. The review and recommendations provided in this assessment go beyond compliance to help build a culture of inclusivity and barrier-free access that fosters a welcoming environment.

This assessment was primarily obtained by an online "Accessibility Self Evaluation" survey, developed by the Community Accessibility Manager. The survey was distributed in two categories: pilot and non-pilot departments. Pilot departments included: Human Resources, Arts & History, Department of Finance & Administration, and Parks & Recreation. Non pilot departments included: Community Engagement, Boise Fire, Planning & Development Services, Library, Mayors Office, Legal, Information Technology, and Boise Police. This structure allowed for feedback from the pilot departments prior to tasking all remaining departments with the survey. This survey was taken by representatives of all departments. Additional information was collected via complaint resolution and feedback from community members. Final survey questions asked of all remaining departments regarding their policies, practices, and procedures can be found in "Accessibility Self Evaluation (Non Pilot Depts)." Responses by department can be found in "Accessibility Self Evaluation Responses (Pilot Dept)" and "Accessibility Self Evaluation Responses (Non Pilot Dept)." Responses for the Boise Airport and Public Works can be found in "Accessibility Self Evaluation Responses - Airport" and "Accessibility Self Evaluation Responses - Public Works."

Based on staff responses it is clear the city understands its obligations under Title II of the ADA, but additional steps for a holistic approach are needed to ensure that people with disabilities enjoy equal opportunities to participate in all programs and services.

This report is divided into sections where each section includes the applicable citation from Title II of the ADA, summary of findings based on the "Accessibility Self Evaluation" responses, and recommended action items for implementation.

3.1 Designate a Responsible Employee

Title II of the ADA states that a public entity must designate a responsible employee and adopt grievance processes. A public entity that employs 50 or more persons shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under this part, including any investigation of any complaint communicated to it alleging its noncompliance with this part or alleging any actions that would be prohibited by this part. The public entity shall make available to all interested individuals the name, office address, and telephone number of the employee or employees designated pursuant to this paragraph. (28 CFR § 35.107(a)).

Findings: The City of Boise has met this obligation to designate a responsible employee by creating a full-time, dedicated position, and hiring Ciera Garechana, the Community Accessibility Manager, to the Office of Community Engagement.

3.2 Grievance Procedures

Title II of the ADA requires a public entity to adopt an adequate grievance process. 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. (28 CFR § 35.107 (b)).

Findings:

The City's website provides a grievance procedure and complaint form, but it was not intuitive to find. Additionally, accessibility work was moved from Human Resources to the Office of Community Engagement in July 2021. Some websites have not fully transferred as of writing this document. Additionally, searching "ADA" may also yield options that relate to Ada County. However, when searching "ADA Boise" in an external internet search engine, a top finding is a link to the city's ADA page.

The City of Boise has created a "Notice Under the Americans with Disabilities Act" which is physically posted at all publicly accessed entrances and lobbies in city-owned properties. This notice is also large print and high contrast for those with visual disabilities. This notice is also posted on the City of Boise's public-facing website. Additionally, community members regularly contact the Community Accessibility Manager via phone and email.

Recommended Actions:

- Create trainings for city staff so they are all aware of the city's obligations under the ADA, the city's goals of barrier-free access for all, and the grievance procedure processes.
- Provide an 'ADA Compliance' hyperlink on the city's website home page directly to the grievance procedure form and state the commitment to provide copies in accessible formats upon request.

3.3 - Reasonable Modifications of Policies, Practices and Procedures

Title II of the ADA requires state and local governments to modify its policies when necessary to avoid discrimination:

A public entity shall make reasonable modifications in policies, practices, or procedures when the modifications are necessary to avoid discrimination on the basis of disability, unless the public entity can demonstrate that making the modifications would fundamentally alter the nature of the service, program, or activity. (28 CFR § 32.130 (b)(7)).

Findings:

Survey respondents indicated that they were unaware of a situation where their department was unable to provide an accommodation or modification that was requested by an individual with a disability. Should an instance occur in the future, the city will make reasonable modifications to support barrier free access to people with disabilities.

3.4 – Eligibility Criteria

A Title II entity may not impose eligibility criteria that may prevent a person with a disability to participate in its programs, services, or activities: *A public entity shall not impose or apply eligibility criteria that screen out or tend to screen out an individual with a disability or any class of individuals with disabilities from fully and equally enjoying any service, program, or activity, unless such criteria can be shown to be necessary for the provision of the service, program, or activity being offered.* (28 CFR § 35.130(8)).

Findings:

After reviewing all programs, none imposed eligibility criteria that tend to screen out individuals with a disability. The two exceptions were Boise Police Department (BPD) and Boise Fire Department (BFD). Both departments offer a Ride Along program where all participants must be able to adequately assist in emergency situations by performing needed functions such as quickly exiting the vehicle, running, lying flat on the ground, and using the patrol vehicle radio without compromising the safety or law enforcement mission of the officer. These requirements are necessary for the provision of the program and permitted under the ADA.

3.5 - Employment and Reasonable Accommodation

Title II of the ADA prohibits discrimination on employment on the basis of disability:

No qualified individual with a disability shall, on the basis of disability, be subjected to discrimination in employment under any service, program, or activity conducted by a public entity. (28 CFR § 35.140(a)).

This requires that ADA Title II entities make reasonable accommodation to qualified employees with disabilities. Reasonable accommodation may include modifying work schedules, job restructuring, and making facilities used by employees readily accessible to employees with a disability. Note that the requirements of Title I of the ADA, as established by the regulations of the Equal Employment Opportunity Commission in 29 CFR §1630, apply to employment in any service, program, or activity conducted by a public entity if that public entity is also subject to the jurisdiction of ADA Title I. (28 CFR § 35.140 (b)(1)).

Findings:

Based on survey responses, there is no evidence that the city has failed to provide reasonable accommodation to its employees. Additionally, the city's Employee Handbook has a robust

Equal Employment Opportunity 1.03 policy & ADA Accommodations and Fitness for Work Examinations 1.03d regulation regarding employee accommodations.

Recommended Actions:

- Ensure that materials and publications that contain general information disseminated to city’s employees include information on the requirements of reasonable accommodation under the ADA.
- Human Resources in conjunction with hiring managers should review any physical job requirements to be sure they are necessary, and not something that could be addressed by a reasonable accommodation provided to an employee or in some other way.

3.6 – Effective Communication

Title II entities are required to provide appropriate auxiliary aids and services to ensure “effective communication” with people with disabilities. This obligation applies to all members of the public with disabilities including job applicants, program participants, and people who are seeking information about the city’s programs, services, or activities. Specifically, Title II requires that:

A public entity shall take appropriate steps to ensure that communications with applicants, participants, members of the public, and companions with disabilities are as effective as communications with others. (28 CFR § 35.160 (a)).

Auxiliary aids and services are devices or services that enable effective communication for people who have vision, hearing, or speech disabilities (communication disabilities), or use different ways to communicate. The type of auxiliary aid or service necessary to ensure effective communication will vary in accordance with the length and complexity of the communication involved (e.g., a question at the City Clerk’s Office, a housing meeting, a job description). The obligation to communicate effectively with people who have disabilities applies to the presentation and exchange of information in all forms including sound, print, graphics, and voice.

Furthermore, this requirement may include but is not limited to providing sign language interpreters, telephone handset amplifiers, text telephone devices for Deaf persons (TTY’s), note takers, written materials for persons who are Deaf or hard of hearing or transcripts, braille, digital or audio information for persons who are blind or have vision impairments.

The decision about what auxiliary aid is appropriate should evolve from a consultation between the ADA Title II entity (City of Boise) and the person requesting an accommodation to ensure effective communication. In many cases, more than one type of auxiliary aid or service may make effective communication possible. While consultation is always strongly encouraged to achieve effective communication, the City of Boise and all public entities are required to give primary consideration to the requests of people with disabilities. The Effective Communication

requirement does not necessitate the city to take any action that would result in a fundamental alteration in the nature of its services, programs, or activities or that would impose an undue financial and administrative burden.

Findings:

There is no evidence that the City of Boise has failed to provide effective communication when required. However, from the department responses, providing training, streamlining resources, and clarifying procedures of how to provide effective communication would be beneficial. In general, surveyed staff felt that most of their department employees were not aware of current interpretation or translation services available, older videos do not have captions, employees were not aware of the city's obligation to provide auxiliary aids, and departments rely primarily on Community Engagement staff for website accessibility.

Some of the survey responses regarding effective communication include:

- Most people know where to find this resource (Accessibility page on BoiseHome). For those that don't, they know who to ask in the department for the resource.
- We do not pay for any outside translation services.
- Was unaware of the city's obligation to provide auxiliary aids and currently not set up for it.
- We have been working on the answer to this being "yes" - and have made a lot of progress, but there are still times where this doesn't happen, and there are older videos that do not have captions.
- CE is responsible for webpage content development, yet we communicate our specific needs.
- No one is aware of this (Video Relay or TTY) communication tool.
- Most employees do not know how to arrange for auxiliary services and aids. Some do, but most do not.
- We provide modifications (to policies, practices, or procedures) as needed.
- Nothing has been specified directly to our team about "primary consideration" yet it seems reasonable and common sense practice.

Recommended Actions:

The City should develop and publicize clear processes for members of the public and employees to request auxiliary aids and services:

- Staff should clearly understand the responsibility to provide auxiliary aids and services where necessary to afford qualified individuals with disabilities, including applicants, participants, companions, and members of the public, an equal opportunity to participate in, and enjoy the benefits of, a service, program, or activity of a public entity. (28 CFR §

35.153 (b)). Staff should also clearly understand the process for requesting them when needed.

- Staff needs to understand the scheduling time necessary in requesting a sign language interpreter, best practices in deploying ASL interpretation, interpreter qualifications, etc.
- The city should develop a process for training staff to meet these responsibilities, with a particular focus on understanding the processes for securing braille, making large print, other types of alternate formats; as well as understanding how to request interpreters and the length of time needed prior to an event. It is also important that staff know how to use and maintain the assistive listening systems and other special devices to assist people with disabilities to enjoy effective communication.
- Members of the public also need to have a clear understanding of the process for requesting auxiliary aids and services. This information should be included in the general information for the public, on the city's website and in outreach information.
- Draft a written policy on effective communication so staff across all departments have a shared understanding of their responsibility and clarification about Accommodation procedures.
- Include accurate captioning for all the videos available on the website.

3.7 – Emergency Preparedness, Evacuation Plans, and Emergency Shelters

Although the City of Boise is not the evacuation authority for Ada County, and does not operate emergency shelters, steps could be taken to improve emergency preparations and evacuations for city facilities. Emergency evacuations from city facilities must include plans for people with disabilities whether they be staff or visitors. The City of Boise is responsible for ensuring that staff are aware of these procedures and are trained to implement them during an emergency.

In August 2021, the Risk and Safety team undertook a project to update the City Hall evacuation training for staff. This update included additional information on how to assist people with disabilities, detailed meeting locations, and thorough evacuation roles. This new video also includes captions and audio description. This facility specific update provides a model for further recommended actions across all facilities.

Recommended Actions:

- Ensure that all plans for emergency evacuations from city facilities include guidelines for assisting people with disabilities. These plans should:
 1. Address what to do when an alarm is triggered
 2. Establish meeting places for assistance and evacuation chairs
 3. Provide direction on what to do if assistance is not available

4. Establish floor captains
- Visibly post up-to-date floor plans for all buildings
 - Post information about evacuating people unable to use stairs
 - Update all evacuation plans for each facility to include staff training for assisting people with disabilities
 - As plans are developed or revised, adopt policies to ensure that community evacuation plans aid people with disabilities, including those who have mobility, vision, hearing, or cognitive disabilities, mental illness, or other functional limitations, to safely self-evacuate or to be evacuated by others, including accessible routes (regardless of weather conditions) to shelter area.

3.8 - Website Accessibility

It is the Department of Justice's position that any services provided on a website must be made accessible. City staff recognize that the city's website is not fully accessible to people with disabilities and adaptive technologies. Although strides are being taken to improve accessibility, a larger, more robust effort needs to be undertaken.

Recommended Actions:

- City staff responsible for website management should undergo training on accessibility best practices for posting web content and creating accessible documents. All third-party software should be properly vetted for compliance with WCAG 2.0 AA and section 508 of the Rehabilitation Act.
- Two accessibility trainings were held in January & February 2022 for staff who are responsible for website management as well as social media content.
- Ensure that all the fillable forms on the city's website are accessible.
- Engage community members with cross disabilities in user testing to ensure the city's website and other web-based services are accessible to people with disabilities.

3.9 Special Events Accessibility

The City of Boise is often a permitting authority for many community events. These events range from downtown farmers markets to parades to fun runs. The community therefore often looks to the city to help ensure these events consider accessibility and maintain access. In speaking with community leaders, issues often arise around accessible parking and obstructed public rights of way. Accessible parking is often taken over to be used as loading zones for craft vendors or additional staging for food trucks.

Recommended Actions:

- Compile resources for city staff to ensure full accessibility is a part of planning and execution for all city-sponsored, public events.
- Build accessibility processes and awareness into the special events application and review.
- Collaborate with event partners to educate them on best practices for hosting accessible events to help ensure full accessibility of non-city sponsored events.

3.10 Community Engagement

Community involvement is vital to the City of Boise and an essential part of the ADA requirements as defined in 28 CFR § 35.105. The city is required to involve the public in the evaluation and prioritization process that went into building this plan. To ensure the community had various ways to engage and sufficient time, community engagement opportunities were held in multiple formats.

- City of Boise launched a comprehensive accessibility survey to community members in the fall of 2020 to gauge public opinion and understand the community's priorities for accessibility. The survey was distributed through a plethora of local disability advocacy organizations, such as the Northwest ADA Center and the Council for the Deaf and Hard of Hearing (CDHH), as well on the city's website. It was open for three weeks and received 99 responses. Summary results of the survey can be found in "Community Accessibility Survey Results."
- In December of 2020, City of Boise staff received a policy brief recommending it convene a cross disability advisory committee to build on the work of the Accessible Parking Committee (APC). The brief outlined the importance of elevating the full experience of a person with a disability living, working, and recreating in Boise beyond legal compliance with the ADA. In response to this brief, the Community Accessibility Manager built a taskforce comprised of six community leaders with cross disabilities to bring forth recommendations to ensure Boise is truly welcoming and accessible for everyone. This taskforce brought forward eight recommendations. City staff continue to vet and implement the taskforce's recommendations as of writing this plan.
- On August 26, 2021, the City of Boise sponsored Deaf Awareness Day (DAD). The Community Accessibility Manager as well as a representative from the city's Arts and History Department staffed a sponsor booth to educate community members regarding steps the city is taking towards accessibility and to solicit feedback. Four people with disabilities spoke with the Community Accessibility Manager regarding their thoughts on how the City of Boise can improve its accessibility.
- In early 2021, a five-person community stakeholder group was formed to gather feedback regarding facility assessment findings and proposed prioritization. This "ADA Working Group" comprised of people with cross disabilities and met once every two weeks with

staff from February 2021 to August 2021. This group was actively involved and collaborated with the consultant and city staff.

4.0 Moving Beyond Compliance: Recreation Access for All

The City of Boise Parks and Recreation Department has taken multiple proactive strides to further accessibility beyond mere compliance. Recent work includes upgrading several parks around the Treasure Valley to have accessible fall material, rather than the traditional, inaccessible wood chips. Additionally, the Parks and Recreation design team has been implementing inclusive play equipment to give all community members options for play. A breakdown of their recent and future work includes the following:

Table 1: ADA Remediation Work Performed in Boise Playgrounds

DATE	LOCATION	WORK PERFORMED:
FY19	Cottonwood Playground	Inclusive design play equipment and rubber surfacing installed
FY20	Ann Morrison Playground Surface	Replaced bark with rubber surfacing
	Camel's Back Playground Surface	Replaced bark with rubber surfacing
	Castle Hills Playground Surface	Replaced bark with rubber surfacing
	Fairview Playground Surface	Replaced bark with rubber surfacing
	Morris Hill Playground Surface	Replaced bark with rubber surfacing
	Simplot Sports Complex Playground	Replaced bark with rubber surfacing
	Hobble Creek Pickleball	Accessible court design installed
	Hobble Creek Playground	Inclusive design play equipment and rubber surfacing installed
	Phillippi playground	Inclusive design play equipment and rubber surfacing installed
FY21	Bowler Playground	Inclusive design play equipment and rubber surfacing installed
	Molenaar Playground	Inclusive design play equipment and rubber surfacing installed

DATE	LOCATION	WORK PERFORMED:
FY22	Ann Morrison Fountain	Ground level design for inclusive access
	Hewett Playground Replacement	Inclusive design play equipment and rubber surfacing installed

