



City of Clayton, Missouri

ADA Transition Plan



Updated Feb. 2017

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Introduction

The Americans with Disabilities Act (ADA), enacted in July, 1990, is a comprehensive civil rights law for person with disabilities in both employment and the provision of good and services. The ADA states that its purpose is to provide a “clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities.” This ADA Self Evaluation and Transition Plan was prepared in response to expectations set forth in Title II regulations issued September 14, 2010 and effective March 15, 2011.

ADA Self Evaluation

As required by Title II (Part 35, Section 35.105) the City of Clayton conducted a self-evaluation and transition plan of its sidewalks, curbs, facilities, and parks. The City maintains this plan, listing accessible facilities, barriers, and tracking of projects that are completed, and planned enhancements to accessibility within the community. Clayton maintains accessibility for all City properties, parks, and right-of-way containing buildings, parking lots, sidewalks and curb ramps. As part of the Self Evaluation process, The City of Clayton initiated an outreach program to draw out community concern on ADA accessibility issues in the public right-of-way. Public noticing was followed by outreach efforts that provided stakeholders from the disability community to provide input in the decision making process. The City reached out to Paraquad and other agencies that represent the disability community, such as Society for the Blind, requesting their participation at outreach events. The City welcomes participation from all interested persons regarding our on-going ADA self-evaluation process. A Suggestion Form is available on the website www.claytonmo.gov to facilitate input from the public. Additionally, a suggestion may be submitted in person, by telephone, fax, regular mail, or e-mail. Refer to Appendix A for ADA Coordinator contact information, and refer to Appendix B for Suggestion Form.

ADA Notice

As required by (Part 35, 35.106) the City of Clayton includes ADA Notice of Compliance information in job descriptions, new employee orientation packets, and in frequently used publications and brochures describing City of Clayton programs, services, and activities. The City has consolidated ADA information on its website, to include Transition Plans, ADA Suggestion form, formal ADA Grievance form, and ADA Coordinator contact information. To enhance accessibility to City related information, the public may subscribe to e-mail notifications for public hearings, meeting and other news on the City of Clayton webpage at www.claytonmo.gov.

ADA Responsible Employee and Complaint Procedure

As required by (Part 35 35.107), a public entity that employs 50 or more persons shall designate at least one employee to coordinate its effort to comply with and carry out its ADA responsibilities and shall adopt and publish grievance procedures providing for resolution of complaints. The ADA Coordinator is that designated representative for Clayton. The duties of this position include tracking and responding to all submitted ADA suggestions and formal grievances as they are received. In addition to an ADA Coordinator for all Clayton department needs, the City also employs a full-time Inclusion Coordinator, and participates in the Mid-County Inclusion Partnership with the neighboring cities of Maryland Heights, Richmond Heights, Webster Groves and University City.

The City of Clayton strives to accommodate all users of our facilities and services, and make every attempt to respond to concerns and complaints at the appropriate staff level. A City representative, ADA Coordinator and/or Inclusion Coordinator is ready to meet with users to discuss suggestions for improvement and possible solutions to accessibility concerns.

Users do have the right to file a formal grievance if they believe the City of Clayton has not provided reasonable accommodation or response to concerns. The grievance procedure is located in Appendix C of this report. Information and details may also be found on the website at www.claytonmo.gov .

ADA Transition Plan

As required by Subpart D of ADA Title II (Part 35.149) The City of Clayton makes accessible its facilities, services, programs, and activities to all individuals. As required by Subpart D of ADA Title II (Part 35, 35.150) the City of Clayton maintains an ADA Transition Plan for its facilities and right-of-way. To keep records current and relevant, appendices are updated as projects are completed and new information is available. The ADA Transition Plan is available for public inspection at City Hall and is published on the City webpage at www.claytonmo.gov .

Pedestrian Facilities

The City of Clayton Department of Public Works (PW) is responsible for the operation and maintenance of approximately 99 lane miles and 34 centerline miles of public streets. Additionally, within the public-right-of-way are 55 miles of sidewalk, and 22 traffic signals along with other pedestrian facilities. Since 2009, all City of Clayton PW resurfacing projects have included the review and upgrades of curbs ramps to PROWAG standards. If a project resurfaces the street, for accessibility purposes, the curbs and pavement at the pedestrian crosswalk are in the scope of the project. Any of the features disturbed by the construction must be replaced so that they are accessible. Currently, the City of Clayton ensures the quality and consistency of pedestrian facilities in the public right-of-way by requiring that all design and construction adhere to the City's Public Right-Of-Way and Streetscape Standard Details. The City of Clayton PW maintains its existing pedestrian facilities through an annual sidewalk replacement program. The City of Clayton also operates a number of additional programs devoted to making sidewalks more accessible; including installation, repair, and maintenance programs, a complaint/request process, and pedestrian related capital improvement projects. In addition, developers are required to install ADA compliant driveways, sidewalks, and curb ramps through the submittal of a Right-of-Way Activity permit application and approval by the City. City construction projects completed since 2009 that include accessible improvements to curb ramps, sidewalks, resurfacing and other ADA enhancements are listed in Appendix D.

Regular inspections are performed on our parks, parking lots, and public streets to monitor the condition of ADA signs, parking spaces, curbs, ramps, sidewalks, playgrounds and recreational trails. Our inspections and suggestions from the public are important tools used in ADA project planning and development, and to track ongoing progress on removal of identified barriers. Our facility asset data is continually updated as improvements or repairs are made.

Facilities

The City of Clayton owns and operates ADA compliant buildings and facilities throughout the community. Clayton City Hall/Government Center located at 10 N. Bemiston, provides accessible parking. There is ground floor access to the Council Chamber, Conference Room and other City services. Clayton Police and Municipal Court located at 10 S. Brentwood Blvd., provides accessible garage and street parking. There is ground floor access to court facility and traffic clerk services. The building was completely renovated in 2012 to meet ADA standards. Shaw Park Aquatic Center located at 111 S. Brentwood Blvd. provides accessible parking. There is ground floor access to facility, and several updates have improved overall accessibility. Charles A. Shaw Park is the City's largest park with 47 areas located at 27 S. Brentwood Blvd. The park is bordered by Forsyth Blvd. and Forest Park Expressway on the north and south, and Interstate 170 and Forsyth Blvd. on the west and east. The park has several accessible attractions that draw users from the community and surrounding area. Shaw Park Tree Top Inclusion Playground is a nature themed jungle gym. All the equipment was designed to be accessible for children of all abilities. Features include accessible swings, ramping to even the tallest slides, and specialized activity areas. The project was completed in 2010. The Sensory Garden, built in the footprint of an old playground at the north end of Shaw Park, is situated next to the Inclusion Playground. The plants and other design elements of the Sensory Garden were selected with the intention to provide experiences for seeing, touching, smelling, hearing and tasting. Compliant with ADA regulations, the Sensory Garden is easily accessible by a six foot wide path of concrete pavers winding through a variety of garden beds. The raised planting beds incorporated within the walls of the garden provide easy access to plants for all garden users and are especially helpful to the vision impaired and wheelchair users. Hanley Park, located at 7600 Westmoreland Ave., is the site of the Martin Franklin Hanley home built in 1855. The farmstead is the oldest structure in the City of Clayton, and is listed on the National Register of Historic Places. The restored home is now an historic house museum filled with original family furnishings and artifacts that represent an honest portrayal of 19th century Missouri life. The porches of the house needed to be replaced, and the project presented the opportunity to add an ADA accessible ramp to the back porch, allowing accessible entry to the main floor. New pathways, pavilion, restrooms, and picnic area have improved accessibility to the entire park. All of the City of Clayton parks and facilities were evaluated in 2006 and again in 2011. Any existing barriers at the time were documented with recommendations for improvement and/or correction needed according to ADA Guidelines. The Park Maintenance Department Staff inspect parks and facilities on a regular basis. A list of all City accessible buildings and facilities along with website information may be found in Appendix E.

APPENDIX A

ADA Coordinator –Information Complaint and Formal Grievances

June Frazier
Office of the City Clerk
10 N. Bemiston
Clayton, MO 63105
Phone: 314-290-8469
Fax: 314-863-0295
E-mail: jfrazier@clayotnmo.gov

ADA Inclusion Coordinator – Suggestions and Request for Inclusion Service

Ann Jacobs, Interim Inclusion Coordinator
Center of Clayton
50 Gay Avenue
Clayton, Mo 63105
Phone: 314-290-8500
Fax: 314-290-8517
E-mail: ajacobs@clayotnmo.gov



Appendix B
City of Clayton
ADA Suggestion Form

Name: _____

Address: _____

City, State, Zip Code: _____

Phone Numbers: Home () _____ - _____ Cell: () _____ - _____

E-mail: _____

Suggestion:

Submit to:

City of Clayton
ATTN: ADA Coordinator
10 N. Bemiston
Clayton, MO 63105
E-mail: jfrazier@clayotnmo.gov

APPENDIX C

Completed ADA Construction Projects with ADA Compliance

Project #	Description
PW-2009.01	CDBG Bus Stop Improvements
PW-2009.10	Sidewalk Repairs
PW-2010.03	Wydown and Audubon Pedestrian Crossing
PW-2010.06	ADA Improvements for Park Restrooms
PK-2010.01	Treetop Inclusion Playground in Shaw Park
2011.PW.1401.010	Sidewalk Repairs
2011.PW.1401.041	Forsyth & N. Meramec Resurfacing
2011.PW.1401.050	Sidewalk Repairs
2011.PW.1401.090	Forsyth Boulevard Pedestrian Access
2011.PW.1401.440	10 S. Brentwood Bldg. Remodel
2011.PK.1610.601	Hanley Park Pavilion
2012.PW.1401.041	CDBG Wydown Curb Ramp Preplacement
2012.PW.1401.050	Sidewalk Repairs
2012.PW.1401.080	Pedestrian Enhancement Project
2012.PK.1610.601	Hanley House Porches and ADA Ramps
2012.PK.1610.401	Oak Knoll Park Trail
2013.PW.1401.041	CDBG DeMun Curb Ramps
2013.PW.1401.050	Sidewalk Repairs
2013.PW.1401.300	ADA Transition Plan
2013.PW.1401.010	Claverack Park Resurfacing
2013.PW.1401.015	Wydown Resurfacing
2013.PK.1610.401	Oak Knoll Park Playground
2013.PK.1610.101	Shaw Park Recreational Trail
2014.PW.1401.010	CDBG DeMun Curb Ramps
2014.PW.1401.050	Sidewalk Repairs
2014.PW.1401.080	Brentwood & Carondelet Streetscape
2015.PW.1401.050	Sidewalk Repairs
2015.PW.1401.401	CDBG Shaw Park Underpass Curb Ramps
2015.PW.1401.010	2015 Residential Resurfacing
2016.PW.1401.010	2016 Residential Resurfacing
2016.PK.1610.501	Taylor Park Renovations

APPENDIX D



**The City of Clayton
Grievance Procedures Under
The Americans with Disabilities
Act of 1990**



This Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 (“ADA”). It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the City of Clayton. The City of Clayton’s Personnel Policy governs employment related complaints of disability discrimination.

The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of complainant and location, date and description of the problem. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint will be made available for persons with disabilities upon request.

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

June Frazier, City Clerk
City of Clayton
10N. Bemiston
Clayton, MO 63105
jfrazier@claytonmo.gov

Within 15 calendar days after receipt of the complaint, the City Clerk or designee will offer to meet and/or confer with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days of the meeting or conference or complainant’s failure or refusal to meet or confer, the City Clerk or designee will respond in writing by U.S. Mail, first class, or where appropriate, in a format accessible to the complainant, such as large print, Braille or audio tape. The response will explain the position of the City of Clayton and, if appropriate, offer options for substantive resolution of the complaint.

If the response by the City Clerk or designee does not satisfactorily resolve the issue, the complainant and/or his/her designee may appeal the decision within 15 calendar days after the receipt of the response to the City Manager or designee.

Within 15 calendar days after receipt of the appeal, the City Manager or designee will offer to meet and/or confer with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting or complainant’s failure or

refusal to meet or confer, the City Manager or designee will respond in writing, and, where appropriate, in a format accessible to complainant, with a final resolution of the complaint.

All written complaints received by the City of Clayton as listed above, and responses from these offices will be retained by the City of Clayton for at least three (3) years.



The City Of Clayton
Grievance Form
Discrimination based on Disability



It is the policy of the City of Clayton to provide assistance in filling out this form. If assistance is needed, please contact the ADA Coordinator at 314-290-8469.

NAME of Complainant: _____

NAME of Complainant's Representative (if one): _____

Complainant's ADDRESS: _____

CITY, STATE AND ZIP CODE: _____

TELEPHONE NO: Work: _____ Home: _____

Cell: _____ TDD: _____

TELEPHONE NO. of Representative: Home: _____ Alternate: _____

Best Means and Time for Contacting Complainant: _____

Best Means and Time for Contacting Representative: _____

Nature of Complainant's Physical or Mental Impairment: _____

What major life activities are substantially limited by the Impairment described above: _____

Program, Service, or Activity to which access was denied or in which alleged discrimination occurred:

Nature of alleged discrimination: _____

Date of alleged discrimination: _____ **Today's Date:** _____

Resolution requested: _____

I certify that I am qualified or otherwise eligible to participate in the program, service, or activity and the above statements are true to the best of my knowledge and belief.

Signature of Complainant: _____ **Date:** _____

I certify that I am qualified or otherwise eligible to participate in the program, service, or activity and the above statements are true to the best of my knowledge and belief.

Signature of Representative: _____ **Date:** _____

APPENDIX E

City of Clayton Accessible Facilities

<u>Facility</u>	<u>Location</u>	<u>Website</u>
The Center of Clayton	50 Gay Ave.	www.centerofclayton.com
Shaw Park Aquatic Center	111 S. Brentwood Blvd.	www.claytonmo.gov/pool
Shaw Park Ice Rink	217 S. Brentwood Blvd.	www.claytonmo.gov/rink
Shaw Park Tennis Center	231 S. Brentwood Blvd.	www.claytonmo.gov/tennis
Charles A. Shaw Park	27 S. Brentwood Blvd.	www.claytonmo.gov/parks
Historic Hanley House	7600 Westmoreland Ave.	www.claytonmo.gov/hanleyhouse
Oak Knoll Park	1 Oak Knoll	www.claytonmo.gov/parks
Taylor Park	222 N. Central Ave.	www.claytonmo.gov/parks
Anderson Dog Park	8275 Clayton Road	www.claytonmo.gov/parks
Government Center-City Hall	10 N. Bemiston	
The Heritage Building	10 S. Brentwood Blvd.	
Municipal Court	10 S. Brentwood Blvd.	