



Architecture Engineering Planning Interiors

1050 20th Street, Suite 250  
Sacramento, CA 95811

o: 916/446-0206

f: 916/446-0894

# County of Alameda - Santa Rita Jail Self-Evaluation and Transition Plan

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## EXECUTIVE SUMMARY

The County of Alameda initially retained Vanir Construction Management (Vanir) to complete a Self-Evaluation and Transition Plan (Transition Plan) that sets forth the steps necessary to ensure compliance with the American with Disabilities Act (ADA) and its implementing regulations with respect to the County's adult detention facility, Santa Rita Jail. Subsequently, the County retained DLR Group (DLR) to update this Transition Plan during the process of preparing construction documents for certain ADA-related construction work in Santa Rita Jail being performed in response to the County's settlement in the case of *Legal Services for Prisoners with Children, et al. v. Ahern, et al.*, Alameda Superior Court, Case No. RG1265266 (the Litigation). The following report is a summary of survey findings and recommendations made by Vanir to ensure that the County of Alameda's Santa Rita Jail is in compliance with current ADA laws, with updates by DLR Group and KTA (as a consultant to DLR Group).

The ADA specifies that *Government Entities* have an obligation under the ADA that is somewhat different than the obligation of *Private Entities*. *Government Entities* are required to perform a two-step process as follows:

### Step 1 – The Self-Evaluation and Transition Plan

- a. Perform a 'Self-Evaluation' of all of the various *Programs, Activities, and Services* that they provide to the public, to determine if there are areas in which the disabled are not able to participate equally, and to develop policies and procedures to assure equal participation.

The Self-Evaluation uses subjective recommendations designed to put Santa Rita Jail on a path toward greater ADA compliance. These recommendations are based on several factors that change over time, such as: budget, changing demographics of inmates, advances in technology, future expansion projects, changes in ADA standards.

Therefore, it is important that the *Self-Evaluation and Transition Plan* be reviewed and updated periodically to reflect current conditions. Because of the Litigation, the County has prepared this Transition Plan for Santa Rita Jail that is separate from the County-wide Transition Plan.

- b. Develop a 'Transition Plan' to correct any physical construction barriers that limit the disabled from full and equal participation in the *Programs, Activities and Services* that are made available by the *Government Entity*.

The *Transition Plan* consists of two major parts, the impartial *Assessment* of the physical plant, and the *Plan of Action* which identifies construction remedies and timing.

### Step 2 – The ADA Assessment

The ADA Assessment is an objective assessment of existing conditions at Santa Rita Jail and comparison to the existing ADA Standards. The Assessment is fact-based and does not reflect opinions or recommendations, and in most regards, does not change over time.

### Summary of Plan:

The creation of this Transition Plan included an initial self-evaluation of the Santa Rita Jail (SRJ) program facilities and policies and procedures. This Transition Plan finds that to a large degree, Santa Rita Jail provides *Programs, Activities and Services* to the citizens of Alameda County in a manner that is accessible to those with disabilities. To the extent that improvements can be made to provide greater access to the disabled, these improvements can be grouped in three categories:

1. Recommendations for changes in Policies and Procedures:

- Communication with Deaf / Blind
- ADA Tracking / Forms / Communication
- Recommend Centralizing ADA Authority to make Reasonable Accommodations
- Recommend larger role of the ADA Coordinator

2. Recommendations for Physical Plant Alterations

The facilities substantially provide access to those with disabilities but must be upgraded.

- Minor changes are required throughout the facility to items such as: toilets, lavatories, drinking fountains, telephones, doors, door hardware, countertops, paper towel dispensers, grab bars, and doors
- Medium-sized changes requiring expansion of shower and toilet rooms in housing areas
- Larger-sized changes in housing areas to remodel cells and dorms to convert a specified number to reach the percentages required by the ADA

3. Recommendations for Timing of Construction Projects

|             |   |            |
|-------------|---|------------|
| Priority 0: | Public site work and entry path of travel   | Years: 0-1 |
| Priority 1: | Housing - 2 Major Phases                    | Years: 2-4 |
| Priority 2: | Program Areas                               | Years: 4-5 |
| Priority 3: | Title II Compliance of Staff/Administration | Years: 5-8 |

## SECTION 1 - ADA BACKGROUND

### INTRODUCTION

#### Purpose of Plan

The purpose of this plan is to identify areas within Santa Rita Jail that are not in compliance with the ADA, and to recommend the most cost effective, reasonable means to provide access for the disabled. The recommendations will be either to:

- A. Modify Policies and Procedures
- B. Modify Building infrastructure to provide access

#### Alameda County Continuing ADA Compliance:

Construction Standards (ADA Accessibility Standards, or Guidelines) in support of the ADA laws were developed in the early 1990's, with a new updated Standard issued on March 15, 2012, well after Santa Rita Jail was designed and constructed. Thus, Santa Rita Jail facilities are typically grandfathered to the codes and standards that were relevant at the time of original construction. This survey effort demonstrates the County's continuing compliance with the Litigation settlement and forward-looking outlook toward providing accessibility to all individuals with disabilities by identifying any barriers and access within the facility, and prioritizing correction measures to mitigate, remove or otherwise address the barriers.

### ADA BACKGROUND

#### American with Disabilities Act:

The American with Disabilities Act (ADA) was enacted to integrate more than 43 million individuals with disabilities into the mainstream. Correctional facilities are affected as well as every other industry and profession across the country.

There are five sections to the ADA law; Title I and Title II have a direct effect on correctional facilities like Santa Rita Jail.

**Title I:** Addresses employment practices and is overseen by the Equal Employment Opportunity Commission (EEOC).

**Title II:** Covers the delivery of state and local government *Programs, Activities, and Services*, which includes the programs, activities and services of correctional facilities and is overseen by the Department of Justice (DOJ). Both private and commercial entities must follow the DOJ Standards for Accessible Design based on the Access Board's Americans with Disabilities Act Accessibility Guidelines for Buildings and Facilities (ADAAG) or a certified equivalent. State and local governments can follow either ADAAG or the Uniform Federal Accessibility Standards (UFAS).

### SURVEY STANDARDS & CODES

#### Study Standards

There are numerous regulations, codes, and laws that apply to local adult detention facilities, today and at the time the facilities were first designed and constructed. The County has undertaken the task of determining the current status of its existing detention facilities utilizing the most current

codes and standards (as of the survey date) applying to persons with disabilities. The codes to be used for this Transition Plan are:

- **2010/2013 California Building Code (CBC)**  
Contains the most current of all general building code requirements (i.e. accessibility requirements, electrical and mechanical codes, etc.) as well as the physical plant regulations including the size and adjacency requirements for cells and dayrooms.
- **2010 Americans with Disabilities Accessibility Guidelines (ADAAG) Judicial and Detention Accessibilities Guidelines for Buildings and Facilities**
- **1991 Americans with Disabilities Accessibility Guidelines (ADAAG) Judicial and Detention Accessibilities Guidelines for Buildings and Facilities**  
Individual elements within a facility that can be determined as compliant with the 1991 ADA standards, can generally be given a 'Safe Harbor', and do not require further modifications to comply with the newer 2010 ADA Standards.

## **SURVEY FORMAT**

### **Facility Checklist:**

The requirements of an ADA self-evaluation assessment are highly detailed and complex. This survey initially utilized Vanir's proprietary electronic computer-based surveying program to aid in the assessment process. The program was pre-loaded with three design standards (2010 CBC, 2010 ADA, 1991 ADA) and pre-loaded with typical building types, room types and element types. The assessors then selected the appropriate building, room and element types from pull-down menus, and measured the specific Santa Rita Jail elements against the three standards for that same element type.

Each element within each functional use area was reviewed against the ADA standards. Each ADA standard applies to detention facility operations as it relates to the public and inmate accessibility, while recognizing the safety and security integrity of the facility.

The surveyors reviewed all rooms indicated on the floor plans and recorded areas of non-compliance. All rooms with areas of noncompliance are included in the survey results. Rooms that did not have ADA compliance issues are not listed on the survey results.

### **ADA Targeted Impairments**

The review included the most common impairments that, from time-to-time, are experienced at the detention facilities:

- Mobility
- Hearing
- Sight

### **ADA Targeted Users**

The review also took into consideration the following targeted users:

- Inmates, pre-sentence
- Inmates, post-sentence
- General public
- Visitors
- Medical personnel
- Attorneys
- Emergency officials
- Government officials



**ADA Guidelines:**

Additionally, the review looked at the following ADA measures:

Mobility Impaired (involving arms, hands, legs, feet ( i.e., wheelchair bound) those with prosthesis, etc.):

- Space Allowances
- Reach ranges
- Maneuvering clearances
- Surfaces conditions
- Stalls/partition swings
- Handrails
- Fixtures heights
- Entrances
- Grab bars
- Circulation
- Signage
- Water closets
- Urinals
- Telephones
- Maneuverability
- Sinks
- Elevator space
- Lifts
- Door widths
- Door opening force
- Slopes
- Ramps
- Shower stalls
- Thresholds
- Furnishings
- Closers
- Aisle widths
- Water coolers
- Counters
- Parking spaces
- Tableware
- Dispensers

Sight Impaired (blind, minimal sight):

- Protruding objects
- Obstructions
- Clear aisle ways
- Marked crossings
- Illumination
- Hazards
- Communication devices
- Emergency sounding devices
- Braille characters
- Head room
- Handrails
- Stair rise and tread
- Alcoves
- Floor textures
- Signage
- Contrasting sign lettering

Hearing Impaired (deaf, minimal hearing):

- TTY
- Paper & pencil
- Emergency visual devices
- Placards
- Closed-captioning TV
- Interpreters

## **SUMMARY REVIEW OF SANTA RITA JAIL FACILITY**

This plan includes an initial self-evaluation. The information contained below is a summary of typical findings at Santa Rita Jail. A more thorough and detailed room-by-room survey has been completed as part of the Transition Plan with building drawings and photos. The detailed survey documents are separately bound documents known as "Santa Rita Jail – ADA Assessment, Alameda County" Volume 2 and Volume 3, dated June 6, 2016 (and subsequently updated by DLR).<sup>1</sup>

### **Site Access:**

At the time of the survey, the site path of travel was generally ADA compliant with some typical exceptions at the front public parking lot; such as cross-slopes that exceed 2%, signage issues, and curb-ramp slope issues. Some sidewalk joint separations needed repair.

The main entry ramp had slopes that exceeded the allowable maximums, and required corrective action, as is discussed in more detail under the Public Path of Travel.

In conformance with the terms of the Litigation settlement, the County corrected these Site Access issues in 2016 and 2017.

### **Circulation and Stairs:**

Corridors and hallways generally have plenty of maneuvering clearance and meet the required widths except as noted in the survey.

### **Doors:**

Security personnel operate many of the doors in Santa Rita Jail, including: housing entry, emergency exits, and medical exam rooms. These doors are exempt from compliance with the ADA provisions for inmates.

However, there are several doors in each of the housing modules that inmates may operate including:

- 1) inmate cell door
- 2) dayroom doors to dining areas
- 3) shower room gate
- 4) outside exercise area door
- 5) interview room doors.

All of these doors must meet ADA requirements.

This Transition Plan notes that several doorways in the institution lack "Maneuvering Clearance," which is a clear space required on each side of the door for a specified distance, to allow someone in a wheelchair to maneuver through the tricky operation of pulling or pushing open a door while moving their wheelchair through the doorway.

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<sup>1</sup>The County will not publicly disclose Volumes 2 and 3 because of security risks and facility vulnerabilities that could be identified by doing so. Public safety demands substantially outweigh any need for such disclosure.

A number of door pulls exceed the maximum height requirement and several doors lack pulls or levers. This does not apply to doors that are detention/security doors operated solely by ACSO detention officers.

### **Mezzanine Levels (2nd Tier) Housing Modules:**

In housing units with mezzanine levels or 2<sup>nd</sup> tiers, which contain inmate cells, circulation space, showers, and inmate visiting rooms; the mezzanines are not accessible to inmates in wheelchairs.

### **Stairs in Dayroom Housing Modules:**

Additionally, surveyors found that stairs to mezzanine levels lack the required handrail projections, closed risers, and strip markings at the upper and lower approach.

### **TV Obstructions:**

Televisions in some dayrooms project into circulation paths and may affect safe passage of those inmates that are sight impaired.

### **Signage:**

Correctional facilities are exempt from ADA signage requirements in areas accessed only by correctional staff and inmates, which covers the largest portion of this study. However, in the public areas, compliant ADA signage is required, which includes the public lobby and toilet rooms, on both the upper and lower floors, the visitation areas, and the public corridors and elevators that serve the visiting function.

### **Inmate Showers:**

Common shower discrepancies are:

- Controls are located too high.
- Configuration is non-compliant - ADA requires specific dimensions and geometry
- Shower has a curb making it unusable to those in a wheelchair
- Controls / Shower heads are not properly located
- Clothes hook is placed too high
- Thresholds exceed maximum height of ½".

### **Grab Bars:**

Grab bars are generally provided in accessible restrooms and showers. Grab Bars need to be installed in all accessible holding/sleeping cells. In most cases the grab bars mounted on the sidewall are installed too short to reach the required distance of 54" from the rear wall.

### **Telephones:**

Telephones that serve ADA areas should have volume control, TTY, and a longer cord length. It is commonly concluded that the longer cord length poses a threat to safety of all inmates and staff. Inmates that have difficulty in using these phones have the option to use an unrestricted staff phone with longer cord. At the time of the survey there was only one (1) TTY phone in the Men's West Unit to serve the entire facility. TTY phones should be (and have been made) readily available where serving hearing impaired persons. Such areas typically include housing, intake, visiting, and public areas.

### **Drinking Fountains:**

Drinking fountains have three categories of discrepancies.

- 1) Many have only a 'Low' fountain, and no 'High' fountain.
- 2) Many fountains exceed the maximum height and knee space requirements
- 3) Many have hot water fixtures attached that are too high for access by those in wheelchairs

### **Recreation Yard:**

Although few discrepancies were found in the enclosed recreation yards, consideration should be given to determine appropriate outdoor recreation activities for inmates with disabilities.

Example: Mobility and sight impaired inmates should have unrestricted access to the yard. Their use of the yard should not interfere with non-impaired inmates who command the entire yard with such activities as hand ball. Implement a policy to allow for equal access by all inmates.

As part of the Litigation settlement, modifications are being made to the paths of travel for outdoor recreation facilities and exercise equipment.

### **Housing Accessible Route and Maneuverability:**

With the exception of the maximum-security housing modules, all housing furnishings are non-fixed or movable. It has been noted that the furnishings get moved and thus can limit the accessible route and maneuverability of inmates in wheelchairs.

### **Staff Areas:**

There are numerous areas that are considered staff only which are required to meet accessibility requirements to gain entry to the space and to the toilet rooms. The service building which houses the kitchen, laundry, warehouse, and shops has some primary access issues due to entries which are located on the loading dock at approximately 42" above the ground level. These spaces also have typical toilet room issues, door level hardware, drinking fountain, and protruding element issues. All departments within the service building are to have at least one accessible toilet room, an accessible hi/lo drinking fountain, and path of travel to those elements.

### **Administration:**

In general, the administrative areas have good accessibility. There are many barriers that need to be resolved such as door level hardware, room ID signage, toilet rooms, protruding elements, and hi/lo drinking fountain.

### **Site - Staff / Service Area:**

The rear staff parking lot needs one (1) additional accessible van parking space. There are some typical restriping, signage, stair railings, and door clearance barriers.

## SECTION 2 – SELF EVALUATION

### OVERVIEW

A 'Self Evaluation' is a specific legal obligation under Title II of the Americans with Disabilities Act which requires that government entities prepare a *Self-Evaluation* of their 'Programs, Activities, and Services', and to determine if they are structured and administered in a way that denies access to those with disabilities, and if so, provide corrective actions.

### Programs, Activities and Services:

Each of the *Programs, Activities and Services* that are provided at Santa Rita Jail have been evaluated as part of this report for access to those with disabilities and have been found to be largely accessible to those with disabilities. The primary *Programs, Activities, and Services* are listed below:

- Intake
- Booking
- Holding
- Transfer to other Facilities
- Transfer to Courts
- Access to Legal Counsel
- Communication with Family / Friends / Legal Counsel
- Housing
- Dietary
- Medical / Dental Care
- Education
- Vocational Training
- Religious Services
- Exercise
- Entertainment
- Release

While these *Programs, Activities and Services* are determined to be significantly accessible to those with disabilities, this plan includes the following recommendations that would improve the access further.

These recommended changes are categorized in three groups:

1. General Recommendations
2. Policy and Procedure Recommendations
3. Physical Plant Recommendations - (See Section 3 - Transition Plan)

## General Recommendations:

1. Establish an ADA Compliance Coordinator Position - This is a legal requirement specified in the Americans with Disabilities Act. The success of integrating inmates with disabilities into the institution initially is a full-time effort. This position should be of a higher-ranked position within the institution with authority to implement and further develop the recommendations in this report. The ADA Compliance Coordinator position should obtain ADA code and standards training, attend accessibility conferences and conduct training of other staff.

The Sheriff has designated a position to perform these functions.

2. Obtain Sign Interpreters - The institution should have access to a sign interpreter 24/7 when requested by hearing-impaired inmates. The interpreter can be essential at key points in the booking and arraignment process, i.e. booking, classification, court commission, court hearing. The degree to which an inmate must wait for an interpreter, determines the level of equal access to the *Programs, Activities and Services* of SRJ.

The Sheriff has contracted for sign interpreter services on a 24/7 basis.

3. Establish a System to Identify and Track Disabled Inmates in the Institution - The booking forms should include data fields for denoting inmates with specific disabilities. This data should be utilized by classification in placing inmates with disabilities within the institution. The captured fields will allow collection of data for future ADA planning. Currently this monitoring is done by contacting individual housing pod controllers.

The Sheriff has established a system to identify and track disabled inmates.

4. Develop an ADA Grievance Procedure - This is a legal requirement specified in the Americans with Disabilities Act. Assures that there is a process to resolve concerns regarding compliance. The ADA grievance process should be developed by the ADA coordinator and be made available to the public as well as inmates.

The Sheriff has modified the Santa Rita Jail grievance procedure to provide special tracking for those with disabilities.

5. Provide fixed TDD units for Hearing Impaired - Fixed TDD (Telecommunication Device for the Deaf) should be available at every phone bank where hearing-impaired inmates are accommodated or housed. TDD should be as convenient as fixed phones and accessible to the hearing-impaired inmate as desired.

The Sheriff has established a program to make TDD communication devices in all housing units.

6. Mainstream Inmates with Disabilities Throughout the Entire Institution - Inmates with disabilities should be placed throughout the facility based on classification, although they are allowed to be 'clustered' within their classification level. Cells/housing units should be available to the classification for appropriate placement and accommodation to inmates with specific disabilities. If inmates are ill, they can be placed in the medical unit.

7. Re-assess the role of Classification and Medical in assigning disabled inmates to housing units - Streamline the “housing placement system” involving classification and medical.
8. Define Divisions of Responsibility - Through *Policies and Procedures* manual formalize the responsibilities of each group or agency (Medical, Classification, Custody, Social Services) as it relates to responding to inmates with disabilities in all sequences of the custody, care and release processes.
9. Staff Training - Staff should be trained and routinely made aware of their responsibility in working with disabled inmates - update *Policy and Procedure* criteria and formalize training that sensitizes staff to needs of inmates with disabilities.
10. Modify Inmate Handout - Modify inmate handout with additional information responding to the services available to inmates with disabilities.

The Sheriff has modified the Inmate Handbook to address this issue.

11. Streamline Policy and Procedures - update and simplify policy and procedures for inmates with disabilities. Consider one section that responds to every aspect of a disabled inmates process and accommodation in one section. Currently, the procedures contain applicable sections throughout the entire document, which become difficult to follow.

### **Policy and Procedures Manual - Santa Rita Jail:**

The Santa Rita Jail Policy and Procedures Manual is one of the most important management tools available to the corrections practitioner. *Policies and Procedures* provide direction to staff by communicating the organization’s philosophy and work plan. They serve as an invaluable aid in promoting consistency, efficiency, and professionalism in the performance of facility responsibilities by standardizing the methods by which such responsibilities are accomplished.

The management and operations of Santa Rita Jail focuses on a wide range of correctional concerns and special needs of its detainees. For instance, in addition to general detention operations there may be the need for separate management of pretrial and post-sentenced inmates with special needs, i.e.; alcohol and drug abusers, the mentally disturbed, the physically handicapped, as well as female offenders.

The Self-Evaluation reviewed the Policy and Procedures Manual to determine if the written processes at Santa Rita Jail create an environment of un-equal access to the Programs, Activities and Services at Santa Rita Jail. This review focused on two areas:

1. Written procedures that specifically respond to “persons with disabilities”, and how they are to be accommodated in the detention facility
2. Procedures that could be construed to respond to persons with disabilities.

Santa Rita Jail Policy and Procedures contain the following sections:

- |      |   |
|------|---|
| 1.01 | Administration, Organization and Management |
| 2.01 | Fiscal Management                           |
| 3.01 | Personnel                                   |

- 4.01 Training and Staff Development
- 5.01 Staff Communication and Transportation
- 6.01 Physical Plant
- 7.01 Safety and Emergency Procedures
- 8.01 Security and Control
- 9.01 Special Management Inmates
- 10.01 Post Orders
- 11.01 Intake, Transfer, Release and Records
- 12.01 Classification
- 13.01 Medical and Health Care Services
- 14.01 Food Service
- 15.01 Sanitation and Hygiene
- 16.01 Inmate Rights, Rules and Discipline
- 17.01 Inmate Communication, Mail and Visiting
- 18.01 Inmate Services and Programs
- 19.01 Sheriff's Work Alternative
- 20.01 Transportation
- 21.01 Management Information & Research

**Overall Assessment and Conclusion:**

The Policies and Procedures of Santa Rita Jail are well written and clearly demonstrate a specific intent to provide equal access for the disabled to the Programs, Activities and Services of SRJ. The Self-Evaluation reviewed and made recommendations to further improve the Policies and Procedures and to clarify areas that may be unclear.

The County is moving positively in a direction that will result in better identification, access and accommodations for inmates with disabilities. This self-evaluation has already placed Santa Rita Jail much further in identifying the needs of those individuals, then other jurisdictions and localities with similar conditions.



## SECTION 3 - TRANSITION PLAN

### OVERVIEW

The Americans with Disabilities Act requires that when structural modifications are required to achieve program accessibility, a *Public Entity* must develop a *Transition Plan* that provides for the removal of barriers to the disabled. The essential elements of a *Transition Plan* are defined in the ADA as follows:

1. A list of Physical Barriers
2. A detailed outline of the methods to be utilized to remove the barriers
3. The schedule for taking necessary steps to remove barriers
4. The name of the official responsible for the plan's implementation

Provision for each of these essential elements is noted below:

1. A list of physical barriers.

A detailed ADA Assessment of Santa Rita Jail has been completed. The Assessment is a detailed document that include building floor plans, photographs and spreadsheets that identify elements that are not compliant with either the 1991 ADA, or the 2010 ADA Standards. The detailed survey documents are separately bound documents known as "Santa Rita Jail – ADA Assessment, Alameda County" Volume 2 and Volume 3, dated June 6, 2016 .

The *Assessment* was developed as a 'Stand Alone' document that is strictly fact-based and has been developed without prejudice or subjective opinion.

2. A detailed outline of the methods to be utilized to remove barriers
3. The schedule for taking necessary steps to remove barriers

The main body of this "Section 3 -Transition Plan" provides a description of the methods and timeframes needed to remove barriers from the Santa Rita Jail. The Transition Plan is broken down into **Priorities 0, 1, 2 and 3** with their associated timeframes. Because there are many factors that affect the funding of construction work, the timelines provided are broadly described, and are intended to provide general, rather than specific direction.

4. The name of the official responsible for the plan's implementation: County of Alameda Sheriff

## PRIORITY 0 – URGENT (0-1 YEAR)

### INTRODUCTION

The most immediate need, and top priority areas for providing corrective action, are the areas that provide access to the *facility*. Generically, this is understood to be the *Path of Travel* between the parking and drop-off areas, and the main entrance to the facility.

Without an accessible *Path of Travel* that takes one from the entrance to the property to the main building entrance, the disabled may not be able to access the property at all, and any other accessibility improvements would be of limited value to the disabled.

These *Paths of Travel* constitute the highest priority, and most immediate barriers to the disabled at Santa Rita Jail.

### Systems:

The *Paths of Travel* must also be understood as a 'System' which includes the related facilities that provide a complete and meaningful use to the disabled. For example, access to the public lobby includes full accessible compliance of the lobby toilet rooms, the lobby ATM's, the lobby drinking fountain, and the lobby telephone. In this context it must be understood that the *Path of Travel* is being treated as a whole *System*, in which each of the individual parts helps create the whole *Path of Travel System*. Therefore, individual elements which may seem unimportant individually, nonetheless, are in fact part of a larger system.

### Corrective Action:

The *Paths of Travel* elements listed below were out of compliance at the time of the survey and require or required corrective action. Several of these elements have since been corrected. The complete assessment package provides specific dimensions, code citations, floor plans and photographs of each area that is assessed for a better understanding of the compliance issue.

### Timing / Schedule:

It is anticipated that these issues would be corrected through a single construction project or through several related construction projects over the first-year period of the *Transition Plan*.

## **PATH OF TRAVEL NUMBER 1 - PUBLIC:**

### **Main Components:**

- Accessible Parking Area:
- Bus Drop-Off
- Main Entry Ramp
- Main Public Lobby and Toilet Rooms
- Lower-Level Public Lobby and Toilet Rooms (Completed)

### **Compliance Corrections Required:**

- Accessible Parking Area: *(Completed as of March 2018)*
  - Parking Area Cross-Slopes - Slopes exceed the 2% maximum allowed
  - Parking Signage - remove 'Van Accessible' signage on 9 out of 11 parking signs
  - Curb Ramps - Exceed the 2% cross-slope maximum allowed
  - Provide 1 additional accessible parking stall to meet the requirement of 12 stalls
- Bus Drop-Off:
  - Curb ramp needed
- Main Entry Ramp: *(Completed as of March 2018)*
  - Ramp slope runs exceed the 8.33% maximum allowed
  - Ramp landings exceed the 2% maximum allowed
  - Recommend Correction: Construct new 5'-0" wide ramp next to existing ramp
- Main Public Lobby: *(Completed as of March 2018)*
  - Required to have two Drinking Fountains, High, and Low. No High Provided
  - Service Counter height is above the 36" maximum allowed, requires a section that is lower, including the tray to hand cash / documents to staff
- Main Public Lobby:
  - Floor mats are loose and must be anchored
  - Some Signage has a bright glare finish which is not allowed
  - Some of the signs have letters that are smaller than the 5/8" minimum allowed
  - Telephone needs an International Sign of Accessibility posted
  - Station / Location must be provided for the TDD to be used (located at front desk)
  - There are curved mirrors located at a 68" height, minimum height required is 80"

- Upper-Level Men's and Women's Public Toilet Rooms: *(Completed as of March 2018)*
  - Side Grab Bars are too short, need to extend to 54" measured from the back wall
  - Lavatory height of 35 1/4" exceeds the 34" maximum allowed
  - Mirrors are located at 49", exceeds the 40" maximum allowed
  - There is no Braille signage provided at entry doors to toilet rooms
  - Accessible Toilet Compartment doors must be self-closing and require accessible latches on both sides that do not require tight grasping, pinching, or twisting of the wrist
  - Accessible Toilet stalls are 59 1/4" wide at Men's Toilet room, 60" required
  - Urinal at Men's Toilet Room lacks the maneuvering space required (48" in front) due to a wall that is installed at a 45-degree angle
  - Door at Women's Toilet Room lacks the 18" maneuvering clearance at the pull-side latch area
  
- Lower-Level Public Lobby:
  - Required to have two Drinking Fountains, High, and Low. No High Provided
  - Service Counter height is above the 36" maximum allowed, requires a section that is lower
  - Floor mats are loose and must be anchored
  
- Lower-Level Men's and Women's Public Toilet Rooms:
  - Side Grab Bars are too short, need to extend to 54" measured from the back wall
  - Mirrors are located at 53", exceeds the 40" maximum allowed
  - Lavatory at Men's Toilet Door lacks the maneuvering space required (60" x door + 18") due to the extended lavatory, replace lavatory with another model

## PRIORITY 1 – ACCESS TO PRIMARY FUNCTION FACILITIES

*(All Priority 1 – Access to Primary Function Facilities scope is currently Designed for Construction and is anticipated to be completed by 2022.)*

### INTRODUCTION

The most immediate need, and top priority areas for providing corrective action are the areas that provide access to the *Primary Function* areas. Generically, this is understood to be the *Path of Travel* between the parking and drop-off areas, and the main entrance to the facility. For this phase of the Transition Plan, all classifications of Housing Units are to have accessible cells upgraded to meet 2% of total cells as accessible and Minimum Security Units to meet 4% of total beds as accessible.

The Priority 1 areas of the Transition Plan consist of areas that are in support of the inmate Primary Function (Housing). It must be noted that the function of these support areas is important, and in fact represent many of the specific *Programs, Activities and Services* that a Title II entity must provide in a manner that is accessible to those with disabilities.

However, as was noted earlier, Santa Rita Jail is currently providing all of the *Programs, Activities and Services* in a way that is substantially accessible to those with disabilities. Therefore, the Transition Plan draws a distinction between areas that are physically essential to obtain a higher level of compliance, and those that are in support of that function. The support areas are identified below:

- Gymnasium
- Chapel
- Infirmary (OPHU) - (Infirmary North)
- Clinic - (Infirmary South)
- Exercise Yards

In the context of a jail facility such as Santa Rita Jail, there are two separate *Paths of Travel*, one for inmates, and the other for public / visitors.

**Inmates:** The *Path of Travel* for inmates starts at the point of entry to the facility from the vehicle sally port, where new inmates enter the jail facility. The *Path of Travel* tracks through the booking area, holding cells, fingerprinting, dress-out rooms, corridors and ultimately to an assigned cell or dorm as their destination.

Alternately, inmates may be transferred to the facility from other facilities or from courts. In this situation, the inmates arrive through the vehicle sally port, into holding cells, down corridors and to their assigned cell or dorm.

**Public:** The Path of Travel for the public starts at either the accessible parking stalls, or at the public bus drop-off zone, and tracks across the sidewalk, up the main entry ramp, and to the main public lobby.

Alternately, if the public is coming to the facility for the purpose of inmate visitation, then the *Path of Travel* continues from the public lobby, through

the corridor system to the elevators / stairs, down to the lower level where visitation occurs.

Alternately, if the public is coming for a meeting or to conduct business in the lower-level lobby area, then the Path of Travel extends at grade, along the left side of the Main Ramp, into the lower-level lobby.

These *Paths of Travel* constitute the highest priority, and most immediate barriers to the disabled at Santa Rita Jail.

**Systems:**

The *Paths of Travel* must also be understood as a 'System' which includes the related facilities that provide a complete and meaningful use to the disabled. For example, access to the public lobby includes full accessible compliance of the lobby toilet rooms, the lobby ATM's, the lobby drinking fountain, and the lobby telephone. In this context it must be understood that the *Path of Travel* is being treated as a whole *System*, in which each of the individual parts helps create the whole *Path of Travel System*. Therefore, individual elements which may seem unimportant individually, nonetheless, are in fact part of a larger system.

**Corrective Action:**

The *Paths of Travel* elements listed below, are currently out of compliance, and require corrective action. The complete assessment package provides specific dimensions, code citations, floor plans and photographs of each area that is assessed, for a better understanding of the compliance issue.

**Timing / Schedule:**

It is anticipated that these issues would be corrected through a single construction project or through several related construction projects over the first 2-4 year period of the *Transition Plan*.

## **PATH OF TRAVEL NUMBER 2 - INMATES:**

### **Main Components:**

- Booking Lobby and Holding Cells:
  - Fingerprinting and Holding Cells
  - Dress-Out Areas
  - Vehicle Sally ports
  - Corridor System to Housing Buildings
  - Visiting Area - Inmate-Side

### **Compliance Corrections Required:**

- Booking Lobby (This is a controlled area that does not require corrections):
  - Entry Door Threshold - 1" height, 1/4" maximum allowed
  - Required to have two Drinking Fountains, High, and Low. No High Provided
  - Service Counter height is above the 36" maximum allowed, requires a section that is lower, including the tray to hand documents to staff
- Fingerprinting:
  - Floor mat is too soft and thick for wheelchair use
  - Fingerprinting Equipment is too high for wheelchair use, a second lower station should be provided
  - Penal Code Signage print is too small, 5/8" minimum required
- Holding Cells :
  - Side Grab Bar is too short, needs to extend to 54" measured from the back wall and cross section size is not 1.5" minimum
  - Rear Grab Bar location from centerline is not 24" and cross section size is not 1.5" minimum
  - Lavatory knee space too shallow, needs to extend 8" at a 27" height above floor
  - Telephone is located too high at 55" above a bench
  - Telephone cord length is not 29" long minimum.
  - Water Closet side clearance does not extend 60" min.
  - Water Closet flush controls are not on the open side of fixture
- Dress-Out Areas:
  - A compliant bench 18" tall, and a minimum 20" deep must be provided in each
- Vehicle Sally Ports:
  - At least one Sally port must have a Curb Ramp for wheelchair transportation
- Corridor System to Housing Buildings: No issues
- Visiting Area - Inmate-Side: All existing visiting booths to remain as is. All accessible inmate visiting booths and accessible public visiting booths are to be relocated to the OPHU.

- Visiting - Public Side:
  - Public Telephones in lobby (at lower level) have no volume control - required
  - All existing visiting booths to remain as is. All accessible inmate visiting booths and accessible public visiting booths are to be relocated to the OPHU.



## **PROGRAM SPACES - INMATES:**

### **Main Components:**

- Booking Lobby and Holding Cells:
  - Fingerprinting and Holding Cells
  - Dress-Out Areas
  - Vehicle Sally Ports
  - Corridor System to Housing Buildings
  - Visiting Area - Inmate-Side

## **INFIRMARY:**

### **Main Components:**

- Infirmary Medical Cells
- Infirmary Bathing Rooms
- Infirmary Dialysis
- Infirmary Negative Pressure Rooms
- Corridor
- Non-contact interview Rooms and Visitor Toilet Room

### **Compliance Corrections Required:**

- Infirmary ADA Holding Rooms:
  - Lavatory knee space is too shallow with 4.5" depth at 27" height, 8" required
  - Side Grab Bar too short at 30" from back wall, 54" required
- Infirmary Bathing Rooms:
  - Lavatory knee space is too shallow with 5" depth at 27" height, 8" required
  - Side Grab Bar too short at 30" from back wall, 54" required
  - Tub is missing a grab bar at the spout / controls end
  - Shower floor slope exceeds the 2% allowed
- Infirmary Dialysis: No correction required
- Infirmary Negative Pressure Rooms:
  - Percentage of ADA rooms is in question, 1 required, none provided
  - Convert one Negative Pressure room to ADA
- Corridor: Required to have two Drinking Fountains, High, and Low. No High Provided
- Non-contact Interview Rooms and Visitor Toilet Room:
  - Toilet Room:
    - Maneuvering Clearances
    - Work surface knee space
    - Privacy of interview
    - Accessible visitor toilet room available
    - Pass-through accessibility

## **CLINIC:**

### **Main Components:**

- Exam Rooms
- X-Ray Exam Room
- Holding Room - ADA
- Psychiatric Exam Room
- Dentistry

### **Compliance Corrections Required:**

- Exam Rooms :
  - Furniture arrangement to provide a 36" aisle from door to exam table
- X-Ray Exam Room:
  - Furniture arrangement to provide a 36" aisle from door to exam table
- Holding Room – ADA:
  - Lavatory knee space is too shallow with 5" depth at 27" height, 8" required
  - Bench is too narrow, required to be at least 20" deep
- Psychiatric Exam Room:
  - Doorknob to be replaced with lever handle
  - Door maneuvering clearance on pull side has 48" length, 60" required
- Dentistry:
  - Doorknob to be replaced with lever handle

## **EXERCISE YARDS:**

### **Main Components:**

- Minimum Security Yard
- Medium Security Yard

### **Compliance Corrections Required:**

- Minimum Security Yard
  - Drinking Fountain extends too far from wall - is hazardous to blind
  - Exercise Equipment is accessed across grass / dirt, needs to be paved
  - Exercise Equipment with sufficient transfer areas and maneuvering clearances
  - Baseball diamond grandstand area is accessed across grass / dirt, needs to be paved
  - Baseball diamond grandstand area has no wheelchair viewing spaces provided
  - Concerns about the automated delivery system which may be a hazard to blind and deaf inmates.
- Medium Security Yard
  - Drinking Fountain extends too far from wall - is hazardous to blind
  - Exercise Equipment is accessed across grass / dirt, needs to be paved
  - Exercise Equipment with sufficient transfer areas and maneuvering clearances
  - Concerns about the automated delivery system which may be a hazard to blind and deaf inmates.

Except for the automated delivery system concerns, this work is currently being performed and is anticipated to be completed in 2022.

## **GYMNASIUM AND CHAPEL:**

### **Main Components:**

- Gymnasium
- Classroom
- Toilet Room / Holding Area
- Chapel
- Corridor

### **Compliance Corrections Required:**

- Gymnasium:
  - Exit door pair has door leaves 30" clear width, 32" required
  - Drinking Fountain has 7.5" depth at 27" height, 8" required
  - Required to have two Drinking Fountains, High, and Low. No High Provided
- Classroom:
  - Doors have knobs, lever handles required
  - Adjust door hardware to reduce force required to open, exceeds the 15 lb. maximum allowed
- Toilet Room / Holding Area:
  - Side Grab Bars are too short, need to extend to 54" measured from the back wall
  - Lavatory height of 34 1/2" exceeds the 34" maximum allowed
  - Mirrors are located at 49", exceeds the 40" maximum allowed
  - A bench must be provided that is at least 20" deep
  - Toilet is located too far from sidewall (18.5" from centerline of toilet) 18" maximum allowed
- Chapel: *(Completed as of March 2018)*
  - Pews are located in a way that creates aisles that are too narrow (30" wide), minimum aisle width of 36" is required
  - 2 Wheelchair Spaces must be provided (36" x 48")
  - Each leaf of door pair has 28" of clear width, 32" required
  - Force required to open door pair exceeds the maximum allowance of 15 lb.
  - If cleric room behind alter is accessed by inmates, then the doorknob must be changed to lever handles, and there must be an 18" side-strike clearance on the pull side at the latch area
- Corridor:
  - Door to corridor has knobs that should be changed to lever hardware.

## PRIORITY 2 - PRIMARY FUNCTION FACILITIES

### INTRODUCTION

*(All Priority 2 – Primary Function Facilities scope is currently Designed for Construction and scheduled to be completed in 2022).*

The Primary Function at Santa Rita Jail is the Housing of inmates, which is the focus of the level 2 Priority. There are 18 housing buildings arranged around two central yards at the Santa Rita Jail housing both male and female inmates of multiple classifications. In this priority phase, all classifications of Housing Units should have accessible cells upgraded to meet 3% of total rated capacity of Santa Rita Jail and Minimum Security Units (dormitories) to meet 5% of the total rated capacity of Santa Rita Jail.

### HOUSING CLASSIFICATIONS:

- Male Maximum Security
- Male Medium Security
- Male Minimum Security
- Female Maximum Security
- Female Medium Security
- Female Minimum Security
- Male Admin. Segregation (Ad. Seg.)
- Male Maximum / Behavioral Health
- Male Protective Custody
- Female Admin. Segregation (Ad. Seg.)
- Female Protective Custody
- Program Housing

### Standards:

The ADA Standards require that **3%** of inmate cells and **5%** of dormitory beds meet the ADA accessibility requirements. These percentages must be applied to each 'type' of housing, such as male housing, female housing, different security levels, and segregated housing units. Within the various classifications, the percentages must be met, but not necessarily on a building-by-building basis.

### Clustering:

'Clustering' of accessible housing is allowed as long as the percentages are provided for with a minimum of one for each inmate classification. Within the 18 housing buildings, the clustering can be developed as follows:

All ADA percentage (%) of bed requirements reflects the current status of classifications throughout the facility as of the date of this report.

#### **Male Maximum Security:**

4 Buildings  
Each building houses 96 cells (48 each level)  
Total cells = 384 cells  
3% requirement = **12 cells required to be accessible**

|  |   |
|--|---|
| <b>Male Admin. Segregation:<br/>Male Protective Custody (PC)</b> | 3 Buildings<br>Each building houses 96 cells (48 each level)<br>Total cells = 288 cells<br>3% requirement = <b><u>9 cells required to be accessible</u></b>                               |
| <b>Male Behavioral Health:</b>                                   | 1 Building<br>Each building houses 96 cells (48 each level)<br>Total cells = 96 cells<br>3% requirement = <b><u>3 cells required to be accessible</u></b>                                 |
| <b>Male Medium Security:</b>                                     | 2 Buildings<br>Each building houses 96 cells (48 each level)<br>Total cells = 192 cells<br>3% requirement = <b><u>6 cells required to be accessible</u></b>                               |
| <b>Male Program Housing Dorm:</b>                                | 1 Buildings<br>This building houses 200 beds (20 pods; 4 pods<br>connected to program space)<br>Total beds = 200 beds<br>5% requirement = <b><u>10 beds required to be accessible</u></b> |
| <b>Male Min. Security Dorm:</b>                                  | 4 Buildings<br>Each building houses 240 beds (24 pods)<br>Total beds = 960 beds<br>5% requirement = <b><u>48 beds required to be accessible</u></b>                                       |
| <b>Female Cells:<br/>(Maximum, Ad. Seg., and PC)</b>             | 1 and ½ Buildings<br>Each building houses 96 cells (48 each level)<br>Total cells = 144 cells<br>3% requirement = <b><u>5 cells required to be accessible</u></b>                         |
| <b>Female Min. and Medium Dorm:</b>                              | 1 and ½ Buildings<br>Each building houses 240 beds (24 pods)<br>Total beds = 360 beds<br>5% requirement = <b><u>18 beds required to be accessible</u></b>                                 |

The clustering of accessible cells and beds can be handled in a way that results in a maximum number of ADA facilities in a limited number of buildings, with no accessible facilities whatsoever in many of the Housing Buildings. In this manner, Santa Rita Jail can maximize the use and cost involved in providing accessible upgrades to the supporting or ancillary facilities such as showers, telephones, tables and other facilities in the buildings and pods.

## **CELL BUILDINGS:**

Each Housing unit contains 6 pods (lettered A-F) as 2-level pods with a single accessible cell in either cell number A1 or F8. This one cell requires that the associated shower, tables, telephones and drinking fountain in that pod also be accessible and ADA compliant. Numerically, the one accessible cell constitutes approximately 1% of all cells in the building.

In the Litigation settlement it was agreed that the facility upgrade the existing accessible cell to the greatest extent possible and declare it as 'Equivalent Facilitation' and provide two or more other cells in the accessible pod (A or F) resulting in the maximum value of the ADA pod upgrades. The County has determined that instead of upgrading cells to "Equivalent Facilities" it will provide other fully compliant cells.

The physical upgrades necessary to provide accessible and ADA compliance at typical cells involves the following:

### **Additional Accessible Cells:**

- Demolition of the non-plumbing wall between two cells to provide accessible floor space
- Wider cell door (currently 29" clear, required to be 32" clear)
- Removal of one of two existing combination toilet and lavatories
- Installation of one new ADA combination toilet, lavatory fixture and grab bars
- Removal of one non accessible desk
- Installation of new accessible desk
- Installation of new ligature resistant swivel stool at ADA desk and fixed stool at remaining non-accessible desk).

### **Actual Planned Cell Renovations (Construction Underway):**

The actual planned cell unit renovations under construction are as follows. Note that some adjustments were made to the original plan as part of the development of the Construction Documents for the work currently under way. These changes were previously reviewed and accepted by County Counsel and the Plaintiff prior to bidding of the work.

Female Administrative Segregation:

- 4 ADA Cells (8 beds)
- 2 Accessible Showers
- 1 Isolation Cell
- 2 Dayroom Upgrades (Drinking fountains and dining tables)
- Recreation Yard Upgrades

Male Maximum Security:

- 6 ADA Cells (12 beds)
- 2 Accessible Showers
- 1 Isolation Cell
- 2 Dayroom Upgrades (Drinking fountains and dining tables)
- Recreation Yard Upgrades

Male Maximum Security:

- 5 ADA Cells (10 beds)

- 2 Accessible Showers
- 1 Isolation Cell
- 2 Dayroom Upgrades (Drinking fountains and dining tables)
- 2 Dayroom Upgrades (Drinking fountains and dining tables)
- Recreation Yard Upgrades

Male Administrative Segregation/Protective Custody:

- 5 ADA Cells (10 beds)
- 2 Accessible Showers
- 1 Isolation Cell
- 2 Dayroom Upgrades (Drinking fountains and dining tables)
- Recreation Yard Upgrades

Male Behavioral Health:

- 3 ADA Cells (6 beds)
- 1 Accessible Shower
- 1 Isolation Cell
- 1 Dayroom Upgrades (Drinking fountains and dining tables)
- Recreation Yard Upgrades

Female Overflow:

- 3 ADA Cells (6 beds)
- 2 Accessible Showers
- 1 Isolation Cell
- 2 Dayroom Upgrades (Drinking fountains and dining tables)
- Recreation Yard Upgrades

Male Medium Security:

- 3 ADA Cells (6 beds)
- 1 Accessible Shower
- 1 Isolation Cell
- 1 Dayroom Upgrades (Drinking fountains and dining tables)
- Recreation Yard Upgrades

Male Medium/Maximum:

- 4 ADA Cells (8 beds)
- 2 Accessible Showers
- 1 Isolation Cell
- 2 Dayroom Upgrades (Drinking fountains and dining tables)
- Recreation Yard Upgrades

Female Maximum/Protective Custody/Administrative Segregation:

- 3 ADA Cells (6 beds)
- 3 Accessible Showers
- 1 Isolation Cell
- Dayroom Upgrade (Drinking fountains and dining tables)
- Recreation Yard Upgrades



## **DORM BUILDINGS:**

Each dormitory style Housing Unit consists of multiple dorms in varying ways, most commonly as 24 pod areas with 2 pods combined as a single ADA unit on each side of the housing unit, each served by an accessible shower and toilet room. The bed count for the dormitory housing units is computed as follows:

- 2 beds / bunk
- 5 bunks / pod
- 12 pods at lower level
- 12 pods at upper level
- Total number of beds / building = 240

The numbers may vary from one building to another based on bunk layout and pod combinations. Compliance with the ADA requirements is centered on 3 issues:

- A 36" aisle width in front of the bed for wheelchair access and mounting onto bed
- ADA compliant bunk with mattress between 17 inches and 19 from the floor
- Accessible personal storage facilities (current below bunk storage is not accessible)
- Accessible toilet room (toilet and lavatory)
- Accessible shower

The bunk and pod layout have very few beds with a 36" aisle along the long side of the bed, which results in only 5 beds / building that are currently considered accessible and ADA compliant. At 5% of 240, the minimum number that should be accessible is 12 per building.

It is recommended that the layouts be revised to provide either 1 or 2 accessible pods of 10 accessible beds each / building for a maximum number of 20 ADA beds / building.

The toilet shower area is being remodeled to provide an accessible design to support the accessible dorm pod, and the number of accessible fixtures required.

### **Actual Planned Dormitory Renovations (Construction Underway):**

The actual planned dormitory unit renovations under construction are as follows:

Female Medium Housing Unit :

- 1 Dormitory (10 beds)
- 1 Accessible Shower
- Dayroom Upgrade (Drinking fountains and dining tables)

Male Minimum Housing and Program Unit:

- 1 Dormitory (10 beds)
- Accessible Toilet Facilities
- 1 Accessible Shower
- 1 Isolation Cell
- Dayroom Upgrade (Drinking fountains and dining tables)
- Recreation Yard Upgrades

Male Minimum Housing Unit:

- 12 Dormitories (20 beds)
- 2 Accessible Toilet Facilities
- 2 Accessible Showers
- 1 Isolation Cell
- 2 Dayroom Upgrades (Drinking fountains and dining tables)
- Recreation Yard Upgrades

Male Minimum Protective Custody Housing Unit:

- 1 Dormitory (10 beds)
- Accessible Toilet Facilities
- 1 Accessible Shower
- 1 Isolation Cell
- Dayroom Upgrade (Drinking fountains and dining tables)
- Recreation Yard Upgrades

Female Overflow Housing Unit :

- 1 Dormitory (10 beds)
- Accessible Toilet Facilities
- 1 Accessible Shower
- 1 Isolation Cell
- Dayroom Upgrade (Drinking fountains and dining tables)
- Recreation Yard Upgrades

## **HOUSING SUPPORT FACILITIES:**

In addition to the physical cell or dormitory area, each pod has some associated support areas that must be accessible within the pods that are being designated as ADA pods. These support facilities include:

- Showers
- Toilets
- Lavatories
- Drinking Fountains
- Dining / Worktables
- Telephones
- Other Miscellaneous

The existing facilities are in compliance, with the exception of shower areas which need to be remodeled to meet accessibility and ADA requirements.

Refer to Cell Unit and Dormitory Units for upgrade listings per building

## **MAIN BUILDING – STAIRS AND ELEVATOR**

### **Compliance Corrections Required:**

- Stair Door closers to be adjusted for force to operate
- Stair handrails to be replaced
- Stair Braille signage is missing
- Stair Doorknobs to be replaced with lever handles
- Elevator missing landing hall lights at 72"

## PRIORITY 3 - SUPPORT FACILITIES (PROGRAM SPACES)

### INTRODUCTION

The Priority 3 areas of the Transition Plan consist of areas that are in support of the inmate Primary Function (Housing). It must be noted that the function of these support areas is not un-important, and in fact represent many of the specific *Programs, Activities and Services* that a Title II entity must provide in a manner that is accessible to those with disabilities.

However, as was noted earlier, Santa Rita Jail is currently providing all of the *Programs, Activities and Services* in a way that is substantially accessible to those with disabilities. Therefore, the Transition Plan draws a distinction between areas that are physically essential to obtain a higher level of compliance, and those that are in support of that function. The support areas are identified below:

- Educational (Sandy Turner I)
- Main Building – Staff Access
- Service Building
- Site – Staff Parking

### Corrective Action:

The *Paths of Travel* elements listed below, are currently out of compliance, and require corrective action. The complete assessment package provides specific dimensions, code citations, floor plans and photographs of each area that is assessed, for a better understanding of the compliance issue.

## **SANDY TURNER I EDUCATIONAL CENTER:**

### **Main Components:**

- Classrooms
- Men's and Women's Inmate Rooms
- Ramp

### **Compliance Corrections Required:**

- Classrooms:
  - Push side of emergency exit door lacks maneuvering space as required due to the placement of a fire extinguisher
- Corridor:
  - Door from exterior is 31.5" clear width due to panic hardware on door, 32" required
  - Door has hold-open mounted near bottom, required to be smooth at the bottom 10" at push-side of door
  - Required to have two Drinking Fountains, High, and Low. No High Provided
- Men's and Women's Inmate Toilet Rooms:
  - Lavatory knee space is too short and too shallow with 5" depth at 26" height, 8" required at a 27" height
  - Side Grab Bar too short at 52" from back wall, 54" required
  - Toilet Paper Dispenser provided at back wall is non-compliant, must be located at 7" minimum and 9" maximum in front of toilet at sidewall
- Ramp:
  - Landing at top is 59" long, 60" required
  - Ramp slope and handles are compliant
- Stairs:
  - Stair handrail extensions are 22" long, 23" required

## **MAIN BUILDING – STAFF ACCESS:**

### **Main Components:**

- Administration and Staff Lockers
- Second Floor Staff Areas
- Intake / Release Staff Access

### **Compliance Corrections Required:**

- Administration and Staff Lockers:
  - Room ID – braille signage
  - Door level hardware
  - Toilet Rooms
  - Protruding elements
  - Hi/Lo drinking fountain
  - Staff showers
  - Teacher’s area – doors / signage
  - Breakroom
- Second Floor Staff Areas:
  - Door hardware
  - Maneuvering clearances
  - Handrails at ramp
  - Staff side transition counter
  - Signage
  - Work surface
- Intake / Release:
  - Staff toilet room

## **SERVICE BUILDING:**

### **Main Components:**

- Kitchen
- Laundry
- Warehouse
- Shops

### **Compliance Corrections Required:**

- Kitchen:
  - Locker room remodel
  - Drinking fountain
  - Hand wash sink
  - Floor drain grate
  - Signage
  - Maneuvering clearances
- Laundry:
  - Drinking fountain
  - Toilet room
  - Signage
  - Door maneuvering clearances
- Warehouse:
  - Drinking fountain
  - Door hardware
  - Door maneuvering clearance
- Shops:
  - Drinking fountain
  - Toilet rooms
  - Door hardware
  - Door maneuvering clearances
  - Stairway
  - Breakroom

## **SITE – STAFF SERVICE:**

### **Main Components:**

- Staff Parking

### **Compliance Corrections Required:**

- Staff Parking:
  - Need 1 additional accessible van space
  - Restriping, blue outline
  - Signage, minimum fine
  - Access to loading docks, need ramps



## SECTION 4 – PHASING OF TRANSITION WORK PLAN

### **Timing / Schedule:**

It is anticipated that these issues would be corrected through four phases of construction projects as follows:

|  |  |
|--|--|
| Phase 0: First year of Transition Plan - | Provide public sitework, parking, and entry path of travel   |
| Phase 1: Years 2-4 of Transition Plan -  | Provide additional cells/dorms to reach a 2% of inmates target and remove barriers within primary function facilities and support facilities |
| Phase 2: Years 9-12 of Transition Plan - | Provide additional cells/dorms to reach a 3% of inmates target and dorms to reach 5% of inmate target  |
| Phase 3: Years 5-8 of Transition Plan -  | Title II compliance of staff/admin   |

END - Self-Evaluation and Transition Plan