



City of New York Parks & Recreation



New York City Council

**Committee on Parks & Recreation
Committee on Mental Health, Mental Retardation,
Alcoholism, Drug Abuse & Disability Services**

**Oversight - Are Parks Serving All People?
An Update on Accessibility for Persons with Disabilities**

**Testimony by
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Assistant Commissioner for Recreation & Programming**

INTRODUCTION

When we last met in October 2006, I explained that making our parks facilities accessible was an agency priority. Today, having accessible facilities has become a cornerstone of our work here at Parks to provide opportunities for people with disabilities to have dynamic experiences at parks throughout the city. Our goal has been wherever reasonably possible to go beyond the requirements in the Americans with Disabilities Act (ADA) Accessibility Guidelines and to provide integration and opportunities for recreation and participation for New Yorkers of all abilities.

We were recently recognized for our hard work with the 2009 Title II Public Service Award from the New York City Mayor's Office for People with Disabilities, which Parks received in partnership with the United States Olympic Committee and City Parks Foundation. We are proud of the work we have done, but continue to strive to do more, as there is a lot more to do.

BACKGROUND

As you know, the Americans with Disabilities Act (ADA) is a comprehensive civil rights law that prohibits discrimination against people with a multitude of disabilities such as visual, hearing, cognitive and mobility impairments. When Parks designs new facilities, we are designing for people with varying ability and many diverse user groups.

Long before the American with Disabilities Act was signed into law, Parks began exploring ways to bring recreational activities to all New York City children. As part of an initiative begun in the 1970s to create playgrounds for children with disabilities, Parks opened the first Playground for All Children in Flushing Meadows-Corona Park in 1984. This was the first playground constructed in the United States for both able-bodied children and children with disabilities. It serves as a prototype for similar sites across New York City, the United States, and the world. This playground was designed to accommodate children with mobility impairments

who use crutches, canes, walkers, or wheelchairs, and to provide many opportunities for social, cognitive, sensory and motor activity.

In 1985 and 1993, Parks conducted self-evaluations in an attempt to publish a Transition Plan. In these evaluations, facilities were identified and surveyed, in-house ADA committees were formed, ADA education/training was conducted, outreach to the disabled community was made and customized events were held.

STATE AUDIT

In 2005 the New York City Department of Parks & Recreation was the subject of a State audit. The results of the audit published in December 2005 indicated that many of Parks' facilities had been upgraded to improve accessibility. Seven areas were noted in which Parks could improve ADA accessibility.

In July 2007, the State's follow-up audit on Parks acknowledged the progress that Parks made since the original audit in 2004. The State audit specifically recognized the challenges inherent in creating a Transition Plan for such a large parks system and observed that Parks had taken important steps toward the goals of compliance with the ADA.

TRANSITION PLAN

Since the last Parks committee oversight hearing in 2006 on this topic, we have continued to develop our transition plan—which has become a roadmap for Parks to identify physical obstacles that could limit a person with a disability from participating in a program, activity or service that is offered by Parks, and that provides a plan for the removal of that obstacle. The plan is a result of a thorough assessment of current facilities, parks, playgrounds, bathrooms, historic house museums, beaches, concessions and programs, and it specifies the steps necessary to achieve compliance and the official responsible for implementation of the plan.

Our transition plan is a working document that guides Parks efforts to achieve access for all people with disabilities. It is continually updated upon removal of barriers to ensure that its core goal of access is achieved. Developing the transition plan has been a long and complex process, and so I wanted to briefly outline how we came to this point, and where we currently stand.

The Process of Facilities Assessment

In January 2008, Parks completed a physical assessment of facilities citywide which is now part of our transition plan. In order to complete the assessment, our managers and supervisors received instruction about the Americans with Disabilities Act and the Americans with Disabilities Act Accessibility Guidelines (ADAAG). Michael Crescenzo, Director of Training at the New York City Department of Parks & Recreation, developed a program and trained 86 employees in 10 classes conducted from February 2006 to July 2007. The training classes lasted a full day and covered the parameters of the inspection program and various accessibility issues. The training also included a site visit that allowed each person to have hands-on practice with the program.

The assessment of Parks' facilities was phased due to the large number and variety across our 29,000 acres of public parkland. Here is a description of the six phases of analysis from April 2006 through January 2008:

Phase I of the transition plan included completing a facilities assessment to assess parks, playgrounds, and Greenstreets. Park Managers were trained and given a facilities assessment form that they used to evaluate accessibility in our parks and facilities. The assessment form included ramps, entrance points, accessible routes, parking areas, benches and many other park features that concern access. Managers surveyed 566 large and small parks, 372 Greenstreets, and 949 playgrounds. These assessments were conducted throughout the five boroughs. This process started in April 2006 and ended in November 2006.

Phase II of the transition plan assessed Park bathrooms. Park Managers were again trained for two weeks in the ADA codes and standards. 60 people were trained to perform these inspections. Each manager was equipped with the necessary template (a t-square used to assess the turning radius in a bathroom) and an assessment form. The form measured door clearance, turning radius inside station and stalls, height of amenities, grab bars, sinks and accessible faucets. In this phase, 658 bathrooms were assessed throughout the five boroughs, a process that started in April 2007 and ended in August 2007.

Phase III of the transition plan included nature and recreation centers. Recreation center managers and nature center supervisors were trained in the ADA codes and standards. Fifty recreation managers and ten nature center supervisors were trained to perform these inspections. The assessment form included path of travel, service desk height, door widths, bathrooms, floor clearance, elevator, signage and gym equipment. In this phase, 51 recreation centers and 17 nature centers were assessed throughout New York City. This process started in July 2007 and ended September 2007.

Phase IV of the transition plan assessed beaches. An intern was trained in the path of travel, signage and bathroom standards. The intern and the Accessibility Coordinator surveyed fourteen miles of beaches in Brooklyn, Queens, Bronx and Staten Island. The assessment forms for this process included slopes of ramps, signage, entrances and amenities. This process started in June 2007 and ended in September 2007.

Phase V of the transition plan included assessing our Historic Houses. Our Parks Architectural Conservator was trained in the standards in the ADA/ABA 2004 Accessibility Guidelines, along with the Technical Preservation Services of the National Park Service. This assessment included parking lots, accessible routes, ramps, bathrooms and programmed space. The process started September 2007 and ended January 2008. Sixteen historic houses were assessed.

Phase VI of the transition plan included 116 concessions, including golf courses, marinas, restaurants, snack bars, amusement parks, tennis facilities, ice rinks, sports facilities, stables and gas stations. A Playground Associate, or PA, was trained using ADA Accessibility standards. The Accessibility Coordinator also inspected concessions. In this phase 108 facilities were assessed. The process started October 2007 and ended January 2008.

Agency Transition Plan Review

Since the beginning of this process the Transition Plan has been through numerous reviews within our agency from our capital staff, legal department, press office to our commissioners.

ADA Committee

We now have a draft of the transition plan, and it has been presented to our ADA Committee. We will review their comments, edits, and criticism for implementation in our final draft.

The ADA Committee was established to provide general advisory on accessibility issues within parks and we have since asked them for counsel and support in conducting our facilities assessments and implementing the ADA transition plan. This committee, which meets every other month, enhances communication with the disabled community.

The Committee is made up of individuals with disabilities, and organizations representing individuals with disabilities, as well as individuals affiliated with academic institutions, the medical community, research agencies, and other entities which have a vested interest in addressing the challenges in approving access to New York City parks. Victor Calise is our liaison between the ADA Committee and the agency, and Committee members serve without compensation.

ADA Committee members are provided with an overview of the agency, the ADA audit and transition plan goals. Committee members are in a position to evaluate the agency's effectiveness in carrying out its transition plan in providing access into City parks and venues; inclusion of individuals with disabilities into current programs; outreach to other disabled groups; and implementation of new initiatives to better serve the disabled. In addition, Committee members will work with the agency to develop guidelines to assist people with disabilities; assist Parks staff citywide with issues concerning people with disabilities; and enlist the support of individuals, agencies and entities who are impacted by or have a special interest in parks and who will work with Parks to attain our common goals.

Updating the transition plan

Once the final draft of the transition plan is issued, we will still need to take steps for the plan to remain current from one year to the next.

The transition plan has been and will continue to be shared with Team Leaders from our Capital Projects division, Borough Commissioners, and Chiefs of Operation so each leader and chief will have a clear understanding of what barriers were found in their borough. The barriers that are identified in the plan will be addressed in all new Requirements contracts, capital projects, and work performed by our maintenance and operations staff.

Victor Calise will receive monthly final inspection reports from our Systems & Analysis Team. The reports will be reviewed and if all ADA requirements are met, the Parks facility will be shown as "accessible" in the transition plan. If the requirements are not met, then the coordinator will work with the Team Leader to help resolve the issue.

Every six months, Victor will meet with Team Leaders to discuss capital projects in design and in construction. These projects will be identified in the transition plan with an expected completion date. Transition plan updates will be assessed every calendar year, updates will be made available each February, and all newly constructed facilities will be added to the Parks' website under accessible facilities.

IMPLEMENTATION

We have worked hard to bring the transition plan into action, but at the same time, we also made significant achievements in other facets of ADA compliance. We are working throughout our

agency to meet and surpass ADA guidelines on every level, from building and designing parks and facilities, to training members of our staff, to developing and expanding our programming for park users with disabilities. I want to share with you some of our practices that will make sure that the recommendations that will be made in the transition plan are met.

CAPITAL PROJECT DIVISION

When Parks undertakes alterations to an existing facility, we ensure that the altered portions are accessible. We also must ensure that newly constructed and reconstructed buildings and facilities are free of architectural and communication barriers that restrict access or use by individuals with disabilities. Parks' designers use universal design concepts to provide for a variety of different ages and abilities, including opportunities for persons with mobility, visual, hearing, or cognitive impairments.

With specialized training, Parks' in-house designers and consultants are knowledgeable of ADA accessibility standards. These ADA-related changes improve the way Parks approaches each new capital project, so that accessibility is incorporated into our projects from the onset. In constructing or reconstructing park facilities, Parks commits to meet or exceed New York City and Federal government accessibility standards. For instance, if the law requires that we install one piece of ground level play equipment of one type for every two to four elevated play components, we encourage our designers to install three to four ground level play components that are of different types. We provide 36" and 42" wide entrances instead of the minimum standard 32" width and the Capital Projects division has reviewed and is in the process of revising Parks' Standard Details for ADA compliance.

The design process involves compliance reviews to ensure that accessible features are incorporated into every design. These features can include accessible routes, ramps, handrails, doorway width and hardware, signage, drinking fountains, picnic tables, benches, toilet rooms with accessories, ground level play components and spectator seating area.

ADA accessibility is a component of every capital project. All of our new projects meet and exceed compliance with ADA, including the following:

- Major Deegan Expressway Bridge in Van Cortlandt Park, Bronx
- Owen Dolen Recreation Center, Bronx
- Concrete Plant Park, Bronx
- Greenbelt Recreation Center, Staten Island
- Bloomingdale Playground, Staten Island
- PS 31 Playground, Staten Island
- Washington Square Park, Manhattan
- Columbus Park Pavilion, Manhattan
- Fort Totten Building #431, Queens
- Lost Battalion Recreation Center Elevator, Queens
- Sorrentino Recreation Center Elevator, Far Rockaway
- New Leaf Café, Manhattan
- Lott House, Brooklyn
- Gas Tank Park, Queens
- Flushing Meadows Pool and rink

- Leif Erricson Playground, Brooklyn
- Graves End Park, Brooklyn
- Bushwick Playground, Brooklyn
- Robert Venable Park, Brooklyn

RESEARCH, MEMORANDUM AND INTERAGENCY COORDINATION

Our Capital division has collected a library of ADA reference documents that are used by the Capital Projects staff. In addition, Parks regularly issues memoranda and design directives to guide staff on ADA issues including signage, safety surface, scope writing to meet accessibility goals, sand play, synthetic turf fields, an accessible swing seat, dog runs, and detectable warnings.

Capital Projects' interagency coordination division handles more than 300 projects, both active and inactive, that affect other agencies that do work on parkland. When another agency does work on parkland, we can then request mitigation, often including elements that provide accessible ramps or accessible features.

ALLOCATION OF FUNDS

Major capital improvements can be made when funding for the project is provided. Funds can be allocated from several sources, mainly by the City Council, the Mayor, Borough Presidents, State elected officials and through grants. In addition, our Parks Requirements Division also takes on small improvement projects of \$400,000 or less. When building in-house as part of our requirements contract, we follow specific standards on every one of those projects. For each contract, our Requirements Division raises the grades around comfort stations to eliminate the step and provide an accessible entrance; provides safety surface tile ramps in safety surface contracts; installs curb ramps with detectable warnings on street crossings in sidewalk contracts; and installs wheelchair accessible drinking fountains. And, when funding for supplies and staff are available, Parks maintenance staff has the capability to handle day-to-day ADA compliance repairs. This work includes repairing hand dryers, building entrance ramps, reconfiguring bathrooms and installing signs.

IN-HOUSE MAINTENANCE

Since 2006, our in-house maintenance staff has increased the number of accessible bathrooms by modifying existing bathrooms to comply with ADA accessibility guidelines. We have converted 116 bathrooms throughout New York City. Currently we are converting 25 bathrooms citywide with more conversions expected in the upcoming fiscal year. In addition, following our transition plan, all Parks Recreation Centers are submitting work orders to make the centers more accessible. Parks will also install accessible swings at designated locations when funds for swings are available; and make sure that all in-house picnic benches are made wheelchair accessible.

STAFF TRAINING ON ACCESSIBILITY

Building parks is just one aspect of ADA compatibility at Parks. We have also provided staff training on accessibility issues. Since 2003, Parks has invited the most knowledgeable experts in

the field of accessibility to speak to our staff. These organizations include Cornell University, United Spinal Association, U.S. Department of Justice, New York State Office of Advocate for Persons with Disabilities, United States Access Board, and Paralyzed Veterans of America. Last December, Charles Rudesill Deputy Director of Landscape Design and ADA Liaison for Capital Projects, gave a presentation on ADA compliance to Capital Projects staff. Victor Calise hosted an ADA seminar in July 2009 at Fowler Recreation Center in Queens, which addressed current ADA concerns and innovative design. Members of the disabled community were present to discuss challenges they face in parks. Larry Labiak, Disability Policy Officer from the Chicago Park District, came to New York to present the state of accessibility in the Chicago Park District at the Olmsted Center on August 2009. In addition, Parks is a member in the American Institute of Architects Continuing Education System.

Furthermore, members of our Recreation staff have attended many events related to special needs, including workshops on how to include children with disabilities in their programs and a yearly disabled camp fair hosted by Resources for Children with Special Needs to promote programs in parks. They also plan to attend an inclusion training hosted by SUNY Cortland's New York State Inclusive Recreation Center.

PROGRAMS

With this training, our Recreation staff has helped us further develop programs that include people with disabilities. The fruits of our labors are made clear during beaches and pools season. We have installed pool lifts in 34 of our outdoor pools so people with disabilities can access our pools and enjoy our Bethesda swim program that teaches people how to swim for free. At our area beaches, we have installed Mobi-mats, which are mats that go on top of the sand and allow people with mobility limitations to get from the boardwalk onto the sand. So far, we have installed 3,060 linear feet of Mobi-mats, at eight locations, costing \$222,755. There are plans to install more mats on our beaches next season, as requested, they will be made wider to accommodate more people. Beach wheelchairs are also being considered at locations such as Orchard Beach.

In addition, we have plenty of year-round programming for athletes with disabilities and amateurs alike to enjoy. Wheelchair basketball programs are operating on a weekly basis in recreation centers in Queens and Manhattan. Installed raised wheelchair accessible planting beds with varying heights at the Umoja community garden in Brooklyn and the Sensory Garden in the Bronx. We work with adaptive physical education teachers in New York City schools to involve children with Paralympic Sport New York City. Accommodate people with varying abilities at the Alley Pond Park Adventure Course (ropes course). People with disabilities can participate in activities at the ground level, low ropes level, or high ropes level. And lastly we host tournaments for people with disabilities such as the Major League Wheelchair Softball Tournament at Citi Field in Queens. . In July of this year The Dwarf Athletic Association of America hosted the 23rd Annual National Games in NY and Icahn Stadium was one of their premier venues. Icahn Stadium was also host to the Paralympic Sport New York City's Track and Field Program this past August.

STRATEGIC PARTNERSHIPS

Since 2006, Parks has actively pursued partnerships with various organizations to assist in programming. Members from some of these organizations also provide us with valuable feedback from their constituents. The organizations that we have partnered with are:

- New York Center for Autism Charter School
- Resources for Children with Special Needs
- KEEN—a national, nonprofit organization led by volunteers that provides one-on-one recreational opportunities for children and young adults with mental and physical disabilities at no cost to their families and caregivers. This program is hosted every-other Saturday at Recreations Center 54 in Manhattan and once a month at St. James Recreation Center in the Bronx.
- Cross Island YMCA—we are working with them to provide programs for physically disabled youth
- United States Paralympic and Paralympic Sport New York City–Paralympic Sport NYC is involving youth and adults with physical and visual disabilities in sports regardless of skill level
- Multiple Sclerosis Society—we work together to host the annual MS Field Day, which introduces adaptive fitness and recreation to people with MS
- Harlem Independent Living Center
- Wheelchair Sports Federation
- United Spinal Association
- Independent Car Systems
- National Association for Parents of Children with Visual Impairments
- Light House International
- New York Special Olympics
- New York University Hospital
- Shriners Hospital for Children

CONCLUSION

As you heard today, our agency has been active in creating opportunities for people with disabilities to enjoy our parks. We've developed a transition plan, and continue to work throughout our agency to bring our plans into action. It's a long process, and while I can't say we're there yet, I believe that we are moving in the right direction. Thank you for the Council's interest and advocacy for disabled users of our parks.



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Center for Independence of the Disabled, NY

**Accessibility of City Parks
Committee on Mental Health, Mental
Retardation, Alcoholism, Drug Abuse &
Disability Services, and Committee on
Parks & Recreation
November 23, 2009**

Testimony By:
Linda Ostreicher
Director of Public Policy
Center for Independence of the Disabled, NY



A United Way Agency

Thank you for holding this hearing on the accessibility of New York City parks. This is an issue that the Center for Independence of the Disabled, New York (CIDNY) considers crucial for the health and well-being of New Yorkers with disabilities. CIDNY's mission is to help people with all types of disabilities live as independently as they can and want to, and to participate to the maximum extent in community life.

Most of our consumers are people with low incomes, many living in cramped, uncomfortable housing situations, including homeless shelters, adult homes, supportive housing, SROs, rented furnished rooms, and overcrowded family apartments. Public parks offer an escape from such housing into fresh air, natural beauty, and the chance for friendly social interaction. They are free and easy to reach from many parts of the five boroughs.

It has been a source of frustration for disability advocates that for many years, the NYC Department of Parks and Recreation ("the Department") ignored the Americans with Disabilities Act (ADA), until a 2005 report by the New York Office of the State Comptroller (OSC) identified many specific violations of the ADA by the Department.

One of the worst violations was the Department's failure to comply with the requirement that it develop a self-evaluation identifying inaccessible facilities and programs, along with a transition plan detailing how it would make them accessible. The ADA required all government agencies to have such a self-evaluation and plan completed by January 26, 1993.

As of 2009, the Department still does not appear to have a transition plan. On November 17, 2009, the following statement was on their website:¹
"Managers of the NYC Parks Department...are surveying parks throughout the 5 boroughs. The following facilities are currently being surveyed: Playgrounds, Large and Small Parks, Greenstreets. After the completion of the survey, a plan will be developed regarding accessibility issues identified therein. We plan to survey other areas of concern including comfort stations, recreation centers, beaches and concessions and address accessibility concerns in these areas."

The webpage appears not to have been updated since December 2006. If a transitional plan has been developed, it cannot be accessed from this page.

There has certainly been considerable progress since Victor Calise was hired as the ADA Coordinator at the Department in 2006. There are new mobility mats at seven beaches, allowing wheelchairs to roll across the sand toward the ocean. There are wheelchair lifts at many city swimming pools, and an accessible carousel in Staten Island. The Department's website is much more accessible to the visually impaired, and offers more information about accessible activities and facilities, as well as the historical context for accessibility in city parks. The Parks Department offers a variety of recreational sports and exercise programs specifically designed for people with disabilities, such as team sports for wheelchair users.

¹ http://www.nycgovparks.org/sub_about/accessibility/future.html

However, as an independent living center, CIDNY has a strong commitment to full integration of people with disabilities into community activities. We therefore recommend six actions that the Department should take to make parks far more welcoming to people with disabilities. Except for one, the recommendations involve minimal expenses. They are:

1. More integrated recreational and exercise activities
2. Better signage identifying accessible entrances, paths, and facilities
3. Requiring ADA compliance from any organization permitted to use Parks facilities to hold public events.
4. Making it a capital planning priority to renovate all inaccessible comfort stations as soon as possible to make them accessible; and providing well-maintained accessible portable toilets at all inaccessible comfort stations until they are so renovated.
5. Consultation with the disability community to identify accessibility barriers and remedies not covered by federal guidelines.
6. Clarifying information on the Department website regarding accessible entrances to city parks.

1. More integrated recreational and exercise activities

We commend the Parks Department for offering an Accessible Adventure Course in Alley Pond Park, with activities for users of all ages and all physical abilities. We also welcome the Urban Parks Rangers family camping activities, which are also integrated and accessible. The Adapted Aquatics Instruction held last summer made a large step in the direction of inclusive activity, as it served people of all ages with a wide variety of disabilities. It would be even more inclusive if it served anyone who is not comfortable in exercise classes for people who are already physically fit.

Many other activities sponsored by the Parks Department could be made more inclusive. Activities could be rated according to how physically challenging they are, allowing the public to choose activities based on energy level, current state of health and exercise habits, as well as disability. For example:

- Urban Park Rangers tours and hikes could be offered that travel at slow walking speeds, through accessible paths and Parks buildings.
- Chair exercise classes could serve the elderly, people with disabilities, and office workers who want to learn routines to practice during breaks in the workday.

2. Signage for accessible paths and entrances

It does not help people with disabilities that parks have accessible paths and entrances, if we cannot find them. In the summer of 2008, CIDNY staff and volunteers attended a number of performances held in neighborhood parks and found that the single largest barrier to accessibility was the lack of signage.

The NYC Department of Parks and Recreation is responsible for posting and maintaining permanent signs that:

- mark accessible entrances
- direct visitors at inaccessible entrances to the nearest accessible entrance

- mark accessible paths to destination points, such as bathrooms and performance areas.

The OSC's 2005 Audit Report specifically recommended that the Parks Department install such signs.² In 2007 the Department informed the OSC "that signage for playgrounds and small parks are in place, and [that] they plan to place signage in the large parks soon."³ In the four small parks we visited, we found most of the required signs were missing.

3. Requiring ADA compliance from any organization permitted to use Parks facilities to hold public events

The City Parks Foundation is a private non-profit organization that sponsors hundreds of performances in City parks. They rely on funding from the Parks Department, elected officials like you, corporations, charitable foundations and individuals.

In the summer of 2008, CIDNY staff and volunteers attended seven events sponsored by the Foundation in small neighborhood parks. At every event we observed, we found that the Foundation failed to take these simple, inexpensive steps to make performances accessible:

- Post temporary signs, on the day of the event, at accessible entrances showing how to get to the performance area by an accessible path, and from entrances to performance areas showing how to get to accessible seating areas.
- Rent a wheelchair accessible portable toilet at each location where there was no permanent accessible bathroom.
- Include information in their marketing materials about accessibility and where to call to request a specific accommodation for a disability.

This was regrettable, because it was clear that efforts had been made to locate each of the events in an accessible performance space in an accessible park. There were accessible seating areas in each location. CIDNY is eager to help publicize these performances to our consumers, but we cannot do so unless we know that they will be able to find the events and have the same opportunity as other audience members to enjoy them.

4. Making it a capital planning priority to renovate all inaccessible comfort stations as soon as possible to make them accessible. Provide well-maintained accessible portable toilets at all inaccessible comfort stations until they are so renovated.

There are over 600 comfort stations in New York City parks and playgrounds. Seventeen years after the ADA was passed, only 99 have been made accessible.

² "Post international signage for accessibility at each accessible entrance of a facility. Provide signage at all inaccessible entrances to each facility, directing users to an accessible entrance or to a location where they can obtain information about alternative accessible facilities."

³ Letter from New York State Comptroller Thomas DiNapoli to Parks Commissioner Adrian Benepe, "Re: Report 2006-F-53", June 4, 2007.

As you can see from the table below, the distribution of the accessible stations seems uneven across boroughs. Over half of the comfort stations in Staten Island are accessible, while in Queens, less than one out of every 12 is accessible. The Bronx is right at the city average, with 19 of its 117 comfort stations being accessible.

At this rate, it will be 85 years before the bathrooms in all city parks and playgrounds are accessible. People with disabilities should not have to wait 85 years to use a public bathroom.

Number of comfort stations in playgrounds and parks⁴

	All	Accessible	% w/access
Bronx	117	19	16%
Brooklyn	170	21	12%
Manhattan	122	25	20%
Queens	159	13	8%
Staten Island	38	21	55%
NYC total	606	99	16%

5. Consultation with the disability community to identify accessibility requirements not covered by federal guidelines.

The federal government has been extremely slow in developing guidelines on how parks and recreational facilities can comply with the ADA. It was only in the 2004 that they issued guidelines on accessibility for specific facilities found within the City's parks, such as boating facilities, fishing piers, swimming pools, playgrounds, and golf courses. More recently, they issued guidelines about federal parks, which focus on hiking trails, picnic areas and campgrounds. They have not yet addressed the walking paths, lawns, and gardens common in urban parks.

Another shortcoming of federal guidelines is that they are often narrowly focused on the needs of wheelchair users, to the exclusion of those with other disabilities. Blindness, visual impairments, Deafness, hearing impairments, cognitive disabilities, balance impairments, and upper-body impairments are some of the disabilities that can prevent people from using parks programs and facilities without accommodations.

The fact that the needs of people with these latter disabilities are not adequately covered by federal accessibility guidelines does not give government agencies license to ignore those needs. On the contrary, government agencies are still responsible for making their programs and facilities accessible, but have the added responsibility of determining how to do so.

CIDNY recommends that the Parks Department welcome input from people with disabilities who have identified barriers to accessibility, and that the Department

⁴ Analysis by CIDNY of information downloaded on November 17, 2009 from <http://www.nycgovparks.org/facilities/bathrooms>.

appreciate the value of our recommendations regarding ways to eliminate these barriers. We are experts in barriers and accommodations, and our advice can save the City many thousands of taxpayer dollars in consultant fees.

For example, one of CIDNY's staff members, who is blind, wanted to work out at a recreation center, but found the staff were untrained and the cardio machines were not accessible. The staff refused to let her guide dog accompany her into the gym, and also refused to assist her in learning to operate the cardio machines, whose controls were not useable by a blind person.

She contacted Victor Calise and found him very cooperative about informing the staff of that recreation center about their responsibilities under the ADA to people who are blind. He also assisted her in attaching tangible markings to the machine at her center.

We hope that the Department has similarly trained staff at its 49 other recreation centers. We also hope that similar markings have been placed on machines at all the centers, but and that they are being adequately maintained.

6. Clarifying the presentation of information on the Department website regarding accessible entrances to city parks.

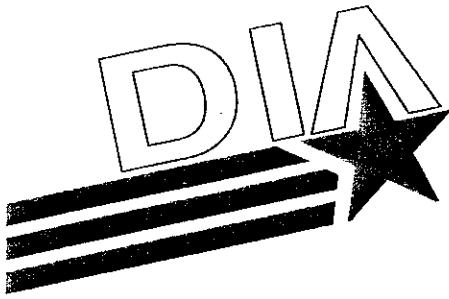
CIDNY would like to congratulate the Parks Department on the interactive map feature on its website that identifies accessible entrances to individual parks. The feature marks accessible entrances with blue symbols and inaccessible entrances with red symbols.

However, when we first used this feature, we looked at a park that seemed to have many accessible entrances, all marked with red wheelchairs. The key that tells you that a red wheelchair represents an *inaccessible* entrance is not visible unless you specifically click on a button that brings it up in a separate window.

The maps are confusing because the wheelchair symbol is used for both types of entrances, accessible and not accessible. It would be better to use a different symbol, perhaps a wheelchair with an X over it that clearly indicates non-accessibility.

Conclusion

CIDNY recognizes the enormous value of public parks and recreational programs. We want all people with disabilities to be able to enjoy them and the emotional, physical and social benefits they provide. To help achieve this, we offer our cooperation in identifying issues and solutions to both the City Council and the Parks Department.



DISABLED IN ACTION OF METROPOLITAN NEW YORK

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November 23, 2009

Are Parks serving all people
with disabilities hearing?

Query: Where does the 'buck' stop?

Good afternoon.

My name is Margie Rubin, Parks Accessibility Advocate for Disabled in Action.

We are here to ask that your committees present on behalf of the people with disabilities community a bill requiring that anytime public money from the City Council or city agency is given for any Parks project that the City require the greatest integrated accommodations for people of all disabilities be included from the beginning lightbulb idea to the community boards to planning to approvals to construction and completion. Failure to do so would mean Parks would have to return the money at 200%.

A wheelchair should never be considered as a decoration nor an accessory that can be discarded at will in order to participate in NYC's parks and/or recreational facilities.

The Access Board states: Departures from particular technical and scoping requirements of [the ADAAG] by the use of other designs and technologies are permitted where the alternative designs and technologies used will provide substantially equivalent or greater access and usability of the facility.

For Parks (letter 8/13/09) to develop its own "our codes" so as to declare ... "areas [are] designed for ground level play, thus eliminating the need for long ramps to above ground features ..." at Tompkins Square Park is appalling and violates the above statement by segregating

children with disabilities from equal interactive play on above ground equipment used by the majority of the currently non-disabled.

As if this is not blatantly discriminatory enough a second letter from Parks (9/1/09) concerning Union Square playground states "...in lieu of ramping a transfer system has been substituted... providing a place to transfer in and ^{out} of wheelchairs or other assisted devices and allowing the child/adult to move freely throughout the elevated and ground level areas"

Bigotry at its best.

When Parks asks people who have medical diagnosis that cause the lack of ability, strength and/or coordination to lift themselves out of their wheel chairs let alone the ability to crawl and drag their bodies up and down stairs, it continues to show an unrealistic understanding of the disabled.

No child or adult who needs a wheelchair for proper support to navigate elevated play equipment should be banned from using it because of Parks poor "our codes" design choices instead of making reasonable accommodations as it has shown it can do in small places such as Vesuvio and Asher Levy playgrounds.

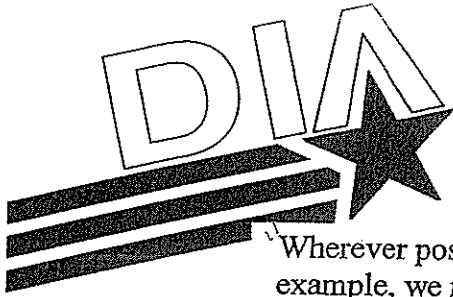
Inclusionary free play is such an essential element for optimal growth, social interaction, and physical development of children that the Office of the United Nations High Commissioner for Human Rights has recognized play as a right of every child.

When will New York City do the same?

Thank you. Please support a bill for equal accessibility in N.Y.C. Parks.

(Washington Sq Park reconstruction failed to make accommodations for use of the fountain; installed inaccessible seating around it - no arms/back; unlockable gates to lawns with tripland fall curbing at access areas).

Support material



DISABLED IN ACTION OF METROPOLITAN NEW YORK

POST OFFICE BOX 30954, PORT AUTHORITY STATION
NEW YORK, N.Y. 10011-0109 TEL / FAX (718) 261-3737

July 27, 2009

Re: Tompkins Sq. Park - access

CADA7

Wherever possible, Parks seeks to exceed requirements outlined by current guidelines. For example, we make an effort to ensure that our projects have accessible routes, accessible drinking fountains, picnic tables and benches with armrests and backs and include accessible play features such as ramps where space allows.

Handwritten note: "Handwritten note to Parks Director from Adrian Benepe"

ADRIAN BENEPE, Commissioner
NYC Parks Department The Arsenal Central Park NY NYC 10021

Dear ^{Adrian} Commissioner Benepe:

A child in a wheelchair opening week of the newly redone playground at Tompkins Park does not find one element that is wheelchair accessible although plenty of space exists for ramping. This is astounding, maddening and sad, especially in light of your stand as Parks commissioner that parks and playgrounds should be all inclusive.



7/09 child in wheelchair - Tompkins Sq. Park

We need to talk.
This discrimination must stop within the department and at the community input process.
My number is (212) 255-1553.

Sincerely,
Marge

Margie Rubin
Parks Accessibility Advocate

Disabled in Action is a civil rights, non-profit, tax-exempt organization
cc: McKinney bcc



DISABLED IN ACTION OF METROPOLITAN NEW YORK
POST OFFICE BOX 30954, PORT AUTHORITY STATION
NEW YORK, N.Y. 10011-0109 TEL / FAX (718) 261-3737

August 6, 2009
Re: Union Square Park access

Commissioner Adrian Benepe
NYC Department of Parks and Recreation
The Arsenal Central Park New York NY 10021

Dear Commissioner ^{Adrian} Benepe:
How did this happen?

Following directly on the heels of inaccessible play equipment at Tompkins Square is the soon to be opened playground at Union Square with its non-ramped, brand-new, bright yellow, multi-tiered play equipment - successfully banning children with disabilities from equal play.

In speaking with representatives from Union Square who seem to be quite pleased that the entry into the playground is accessible go blank when asked if the above ground equipment is ramped. It seems never to have even been the tiniest thought in the final design.

These incidents seem to say that children in wheelchairs no longer have to sit outside playgrounds and look on while other kids use the equipment - NOW they will be able to do that from the inside continuing their isolation and discrimination.

Commissioner Benepe, why is this still happening? The ADA coordinator was informed of access issues in these parks: Tompkins Square last year; Union Square 2 years before.

Please help. We need a solution.

Sincerely,

Margie Rubin
Parks Accessibility Advocate

Disabled in Action is a civil rights, non-profit, tax-exempt organization



City of New York
Parks & Recreation

Adrian Benepe
Commissioner

The Arsenal
Central Park
New York, New York 10065

Capital Projects

Olmsted Center
Flushing Meadows-Corona Park
Flushing, New York 11368

Thérèse Braddick
Deputy Commissioner

(718) 760-6602 / therese.braddick@parks.nyc.gov

VIA STANDARD DELIVERY

August 13, 2009

Disabled In Action of Metropolitan New York
Post Office Box 30954
Port Authority Station
New York, NY 10011-0109
Attn: Margie Rubin

Dear Ms. Rubin:

Thank you for your recent letter regarding accessibility in the newly reconstructed playground in Tompkins Square Park.

after being leveled/rebuilt from ground up

no tapered edge / 2' above the sand - unreachable

As a guiding principle we used the creation of as many interrelated ground level play components as possible. We have found that ground level play fosters interaction between children of all abilities and offers a wide spectrum of play opportunities. The central feature of the playground design is a large water play and sand area. The southwestern corner of the sandbox has an ADA transfer platform 24" high by 30" wide with a tapered edge to facilitate access, as well as its use as a sand table. In addition, the entire water play system can be child activated by three low-flow valves that spray water for short intervals with a button mounted at 33.5" within acceptable reach ranges. One bollard activates a plume of water from a sloping water wall where water cascades down a trough within reach of all children. The other two bollards shoot water directly from the ground in arcs and jets that create a room of water spray for children of all abilities to enjoy equally.

*① narrow counters
② no seat belts*

Kompan, the supplier of the play equipment has certified each of the units for compliance with ADA requirements. At least 50% of the play features are at ground level. Each unit has transfer platforms, counters, low hammocks and areas designed for ground level play, thus eliminating the need for long ramps to above ground features. The center of the park remains open and completely flat, as before, to allow for free circulation across the center of the site. There are no steps or grade change obstructions to any of the play features across the entire site. Please note the drinking fountain has two bowls, an adult and child bowl, both of which are fully accessible.

at bottoms of steps

this is outrageously discriminatory

only at the features themselves making them wheelchair inaccessible

This newly opened playground is one of four playgrounds in Tompkins Square Park. As funds become available to improve the remaining three, we will seek even more creative ways to make them as user-friendly and interesting to children and parents of children with disabilities. We have taken the first step in this process by working directly with our Parks Accessibility Coordinator, Victor Calise, to develop

what about usability

conceptual designs that not only comply with our codes, but excel in making them as interesting and challenging as possible for all children.

not actual needs of wheel chair users

Thank you for your interest in this new playground. Should you have any further questions or concerns, please feel free to contact Gail Wittwer-Laird in our Capital Projects Division at (718) 760-6546.

Sincerely,

Karina Smith

Karina Smith

Correspondence Liaison for Capital Projects

wife of Joshua Laird, Parks accessibility commissioner of Planning and Natural Resources Group

21



September 1, 2009

Ms. Margie Rubin
Disabled In Action of Metropolitan New York
P.O. Box 30954
Port Authority Station
New York, NY 10011-0109

Dear Ms. Rubin:

Thank you for your recent letter regarding accessibility in the newly reconstructed Tot Lot Play Area in Union Square Park.

As a guiding principle, we use the creation of as many accessible play components as possible when building playgrounds to make them inclusive of children of all abilities. One of the central features of the Tot Lot Play Area in Union Square Park is the play equipment for two-to-five-year-olds. As the Tot Lot play area itself is a relatively narrow space, the ability to place ramping onto the play equipment is limited. Because of this space constraint, in lieu of ramping, a transfer system has been substituted. The central play unit has a transfer deck with grab rails at 18 inches, thus providing a place to transfer in and out of wheelchairs or other assisted devices, and allowing the child/adult to move freely throughout the elevated and ground level areas. The play area also features 12 elevated components; while ADA guidelines stress that only 50 percent of elevated components in Parks playgrounds must be accessible (i.e. adjacent elevated components, such as decks and steps, that are on the accessible path can only have an 8-inch change in elevation), all of the elevated components in the Tot Lot Play Area are accessible.

- unable
untrue

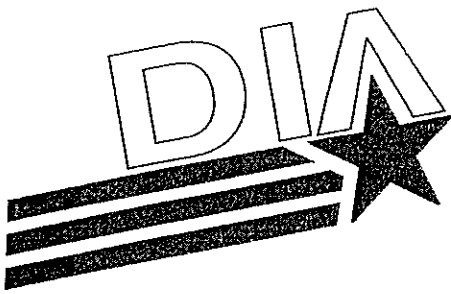
Some highlights of the playground include the nine ground level play components (ADA guidelines only require four), including four types of play experiences (a crawl tunnel, steering wheels, accessible seating and storefronts); an accessible picnic table; an accessible swing area which will soon include an ADA swing seat; and a sand play area for children of all abilities to enjoy equally.

We have exceeded ADA requirements in this play area in Union Square Park, and we are committed to finding even more creative ways to make New York City parks as user-friendly and interesting to children and parents of children with disabilities. We have taken the first step in this process by working directly with our Parks Accessibility Coordinator, Victor Calise, to develop conceptual designs that not only comply with our codes, but excel in making them as interesting and challenging as possible for all children.

Thank you for your interest in this new playground. Should you have any further questions or concerns, please feel free to contact Desmond Spillane, Manhattan Projects Team Leader in our Capital Projects Division, at (718) 760-6544.

Sincerely,


Adrian Benepe



DISABLED IN ACTION OF METROPOLITAN NEW YORK
POST OFFICE BOX 30954, PORT AUTHORITY STATION
NEW YORK, N.Y. 10011-0109 TEL / FAX (718) 261-3737

September 4, 2009
Re: Discrimination

Commissioner Adrian Benepe
New York City Department of Parks and Recreation
The Arsenal Central Park New York, N.Y. 10076

Dear Commissioner ~~Adrian~~ Benepe:

A wheelchair should never be considered as a decoration nor an accessory that can be discarded at will in order to participate in NYC's parks and recreational facilities. SEE ATTACHED LETTER.

Capital Projects seems to be lagging behind your efforts for equal access for people with disabilities, especially with the denial to equal access to ramped play equipment in favor of unseizable transfer platforms at the bottom of steps, sit-at counters and unharnessed hammocks. Unless, of course, this letter is NYC DPR's official position on Americans with Disabilities Act (ADA) compliance for children and adults with disabilities who use wheelchairs.

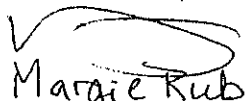
If the letter is the policy of Parks, we all have a major legal issue, especially in light of the relationship of the Tompkins Square playground designer to the assistant commissioner of Planning and Natural Resources Group which would seem to indicate an unrealistic understanding of disabilities within the parks system.

Parks current ADA compliance team is to say the very least sorely inadequate when its response to this recurring disregard (@ Washington Market, CPC/Heckscher, Tompkins Square & Union Square) to equal access is a we'll-do better-next-time mantra... and don't. The ADA is entering its 20th year.

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Again, let's meet and work on this together.
My phone number is (212) 255-1553.

Sincerely,


Margie Rubin
Parks Accessibility Advocate

Robert Levine

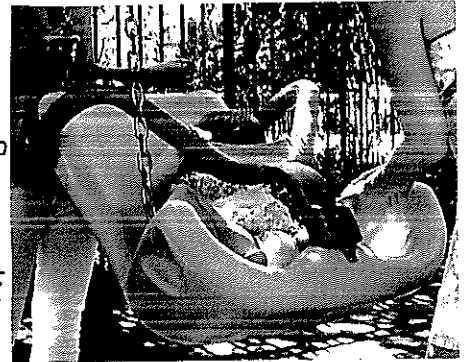
Enclosure

cc: Public Advocate
MOPD
DNMC
CIDNY
USA

ICS
ICD
UCP

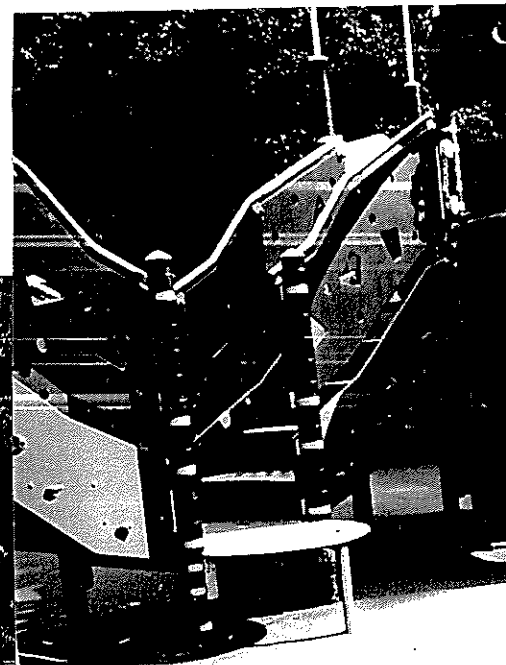
NYS Comptroller NYC Comptroller
NYC Park Advocates
NYLPI
NYLELJ

bcc



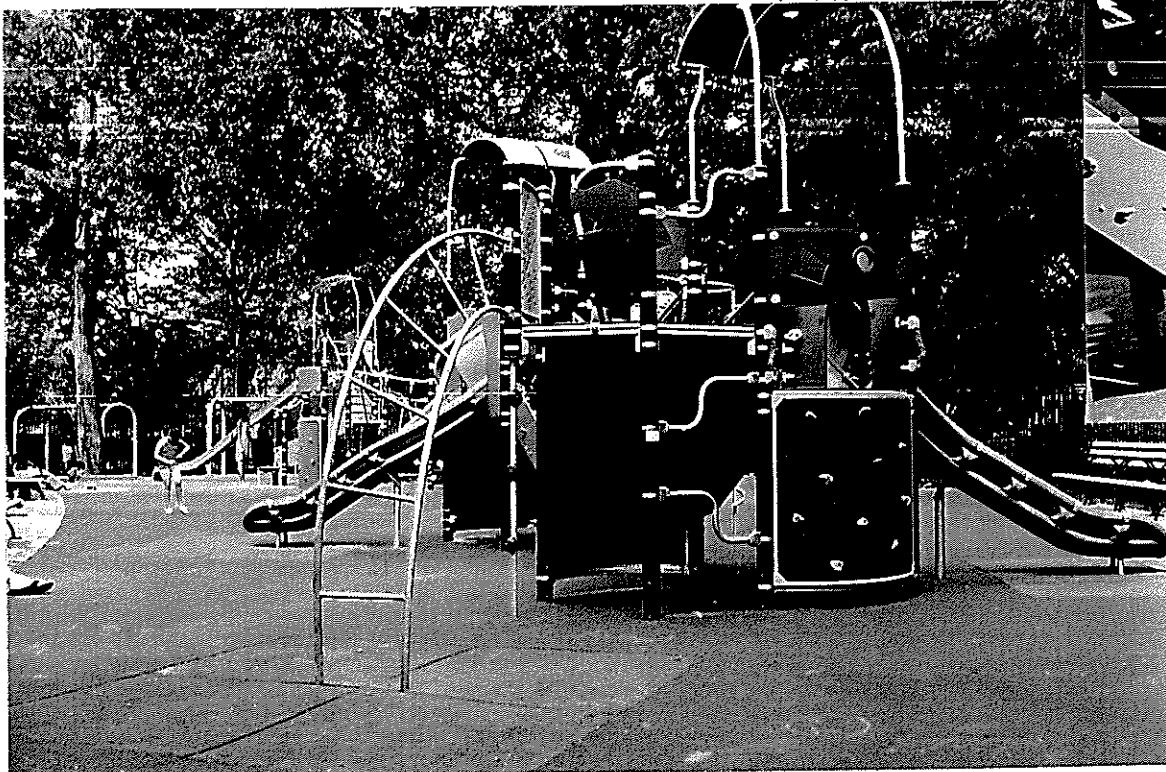
Tompkins Sq

added after complaint -
inappropriate "accessible"
swing - has been removed



Tompkins Sq

↑
transfer seat
at bottom of
steps. Also
presents
problem for
able bodied.





DISABLED IN ACTION OF METROPOLITAN NEW YORK
POST OFFICE BOX 30954, PORT AUTHORITY STATION
NEW YORK, N.Y. 10011-0109 TEL / FAX (718) 261-3737

September 8, 2009

Re: Parks 9/1/09 letter "our codes"

Commissioner Adrian Benepe
New York City Department of Parks and Recreation
The Arsenal Central Park New York N.Y. 10021

Dear Commissioner Benepe:

We have to ask what does New York City Department of Parks and Recreation have against people with disabilities?

Parks cannot simply make up its own "our codes" dismissing the intent and purpose of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act (ADA) and the United States Department of Justice Rule 28 CFR Part 35 for equal ^{access} and use by people of abilities, not just ones selected for convenience.

A wheelchair should never be considered as a decoration nor an accessory that can be discarded at will in order to participate in N.Y.C.'s parks and recreational facilities.

Parks letter of September 1, 2009, continues to show an unrealistic understanding of disabilities when it asks people who use wheelchairs to function without them in order to participate on the unramped elevated play equipment recently installed at the Tompkins Square and soon to be opened Union Square playgrounds.

So, we propose since Parks has an employee, who is a paraplegic parent, that before the Union Square playground opens to the public that you, commissioner, personally accompany him (if he's willing) and watch him maneuver the yellow elevated equipment in its entirety. Imagine

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others on the play equipment at the same time. Parks at this point should realize that there are some people with disabilities who have medical diagnosis that cause the lack of ability, strength and/or coordination to lift themselves out of their wheelchairs, let alone the ability to crawl and drag their bodies up and down stairs. With proper support from their wheelchairs they should be able to navigate elevated play equipment when ADA compliant ramps are an integrated part with ease.

The Union Square "Tot Lot Play Area" to the contrary of what is stated is not so narrow as to have a space constraint for ramping - take a look at Asher Levy, Vesuvio (39'w) and the Hudson River Trust's Jane Street pier (20'w) playgrounds.

No child or adult who needs a wheelchair should be banned from using elevated play equipment because of poor, "our codes" design choices.

We, the people with disabilities community, request a reasonable accommodation of ramped elevated play equipment each and everytime a playground is created or recreated. We also request that any time 2 or more tire swings are installed or may be installed that a platform swing (for use with a wheelchair) be substituted for one of the tire swings.

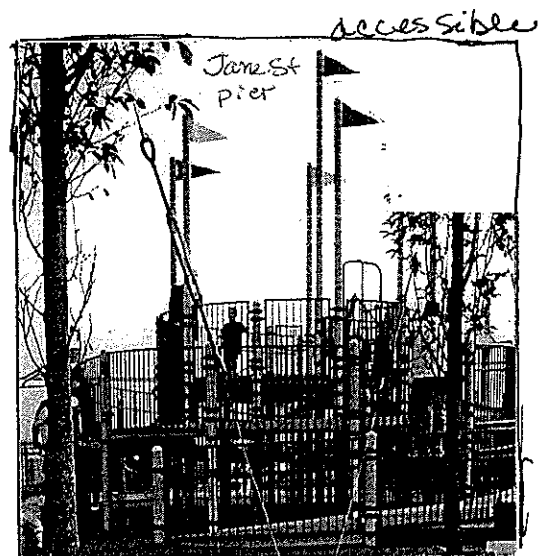
President Barack Obama says his administration will continue to focus on improving the lives of people with disabilities.

What will Parks do?

Sincerely,

Maggie Rubin
Robert Levine
Parks Accessibility Advocates

bcc





City of New York
Parks & Recreation

The Arsenal
Central Park
New York, New York 10021

Adrian Benepe
Commissioner

October 28, 2009

Disabled in Action of Metropolitan New York
Post Office Box 30954
Port Authority Station
New York, NY 10011-0109
Attn: Margie Rubin

Dear Ms. ^{Margie}Rubin:

Thank you for your letter regarding the accessibility features of both Tompkins Square Park and Union Square Park.

We are currently looking into the issues that you've raised. Our Accessibility Coordinator, Victor Calise, will be visiting both parks in the upcoming weeks to assess the existing conditions. We will be in touch with a more detailed response after Mr. Calise's site visits.

We appreciate your advocacy, patience and concern.

Sincerely,


Adrian Benepe

These 2 DPR
play grounds
are decades
old in small
spaces.



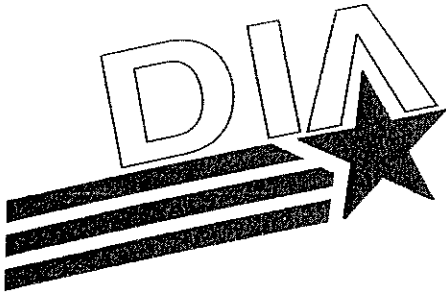
Asherbery Playground



Washington Square Park - toddler playground

accessible





DISABLED IN ACTION OF METROPOLITAN NEW YORK
POST OFFICE BOX 30954, PORT AUTHORITY STATION
NEW YORK, N.Y. 10011-0109 TEL / FAX (718) 261-3737

November 7, 2009
Re: Disparate Impact/Lack
of Most Integrated Setting

Commissioner Adrian Benepe
City of New York Parks & Recreation
The Arsenal Central Park New York New York 10021

Dear Commissioner Benepe:

Parks letter dated October 28, 2009, is offensive.
Please see our attached prior written request
dated 11/9/05 about "interactive accessible play
equipment" at Union Square.

Now that we have been able to see into the
Union Square soon-to-be-opened playground we find
that not even a glimmer of thought was given to
these accommodations for people who use wheelchairs.
There seems to be a widening disparate impact on
people with disabilities Parks usage.

To ask Mr. Calise to look at completed facilities
is insulting when he is a Parks "our codes" employee,
not a registered landscape architect, nor the ADA
compliance officer, nor the executive? who should
be responsible for previewing all projects as to
accessible accommodations not only as to the
law but to the spirit of total inclusiveness.

Who is the executive level personnel
responsible for previewing all projects as to
accommodations for people with disabilities,
especially those who use wheelchairs?

A response within 10 days would be appreciated.

Sincerely,

Margie Rubin

Parks Accessibility Advocate

enclosure
bcc

Disabled in Action is a civil rights, non-profit, tax-exempt organization

11/9/05

Re: Union Sq. Park-ADA

M.I.A. @ WESTBETH

MOBILITY IMPAIRED ARTISTS @ WESTBETH
% MARGIE RUBIN · 55 BETHUNE ST · 1017 · NY NY 10014-2040

212-259-1553

Commissioner Adrian Benepe
attn: Alessandro Olivieri
NYC Parks Department
The Arsenal Central Park New York, N.Y. 10021

Dear Mr. Olivieri:

Under the Freedom of Information Law please send me plans and/or written descriptions of Union Square Park compliance with the Americans with Disabilities Act as to access throughout the entire property at present, planned and corrections.

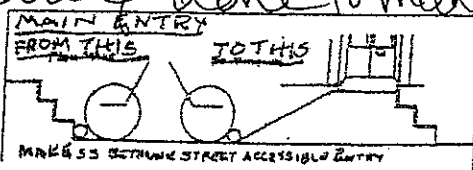
Also, please accept this letter as prior written notice that to date changes made in Union Square Park have been made without regard to accessibility under the ADA.

Media announces reworking the plans for the children's playgrounds and restaurant. Are those plans including interactive accessible play equipment and ADA compliant restrooms?

Bit by bit this park is upgraded denying access to the disabled. A year or so ago an interior fence was put in with new gates with NO dropped curbs for access for any area of the Park. Why on earth was the Gandhi statue put up 3 steps barring the disabled from paying homage like anyone else who wishes to lay flowers, etc? The information legend is buried in the ground. No access exists to the dog run, or to the park from the north side, etc.

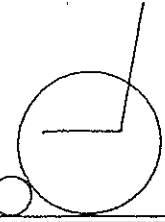
What is being done to make ADA compliance a reality?

Sincerely:
Margie Rubin
Disabled in Action



Member: Disabled in Action/Disability Network NYC/Center for Independence etc

5/28/05
Re: Tompkins
Sq. Park No Access



M.I.A. @ WEST BETH

MOBILITY IMPAIRED ARTISTS @ WEST BETH
% MARGIE RUBIN · 55 BETHUNE ST · 1017 · NY NY 10 014-2040

212-255-1553

WNBC - Producer - Tompkins Sq. Park Dog Run
Saturday Today in New York
30 Rockefeller Plaza NY NY 10020

Dear Gentle person:

Saturday, May 28, 2005, a piece on Tompkins Square Park dog runs was presented stating that it was the best in the City.

I was shocked to see NBC doing a story on a park that continues to discriminate against people with disabilities in 2005.

Did NBC not notice that both entries to the dog runs have steps up, not ramps so that a person in a wheelchair cannot gain independent access?

Not one piece of play equipment has a ramp for interactive play by children in wheelchairs? Why this selective discrimination?

None of the grass areas are without a step up - including the Hari Krishna tree lawn area. The Ladies room is inaccessible, as is the entry to the pool area. None of the picnic tables have overhangs for a wheelchair to get under.

Please start off your investigations with the use of your eyes as to what kind of entry is there for people who use wheelchairs. The American with Disabilities Act is 15 years old.

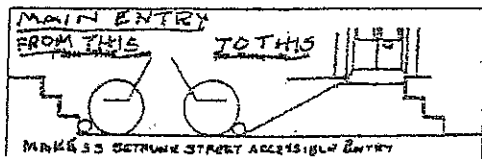
The disabled community needs your help in ending selective discrimination.

Please feel free to contact me at (212) 255-1553.

Sincerely,

Margie Rubin
Disabled in Action

cc: CM Lopez



WESTBETH DISABLED DISADVANTAGED BY DESIGN

Member: Disabled in Action/Disability Network of NYC/Center for Independence for Disabled NY/United Spinal Association

P.O.I.L RESPONSE 10/6/09 from D.P.R.



Schoolyards to Playgrounds Initiative

Q.1 How many schools are participating per borough?

Ans: Brooklyn-94, Manhattan-20, Queens-67, Staten Island-27 and Bronx-46.

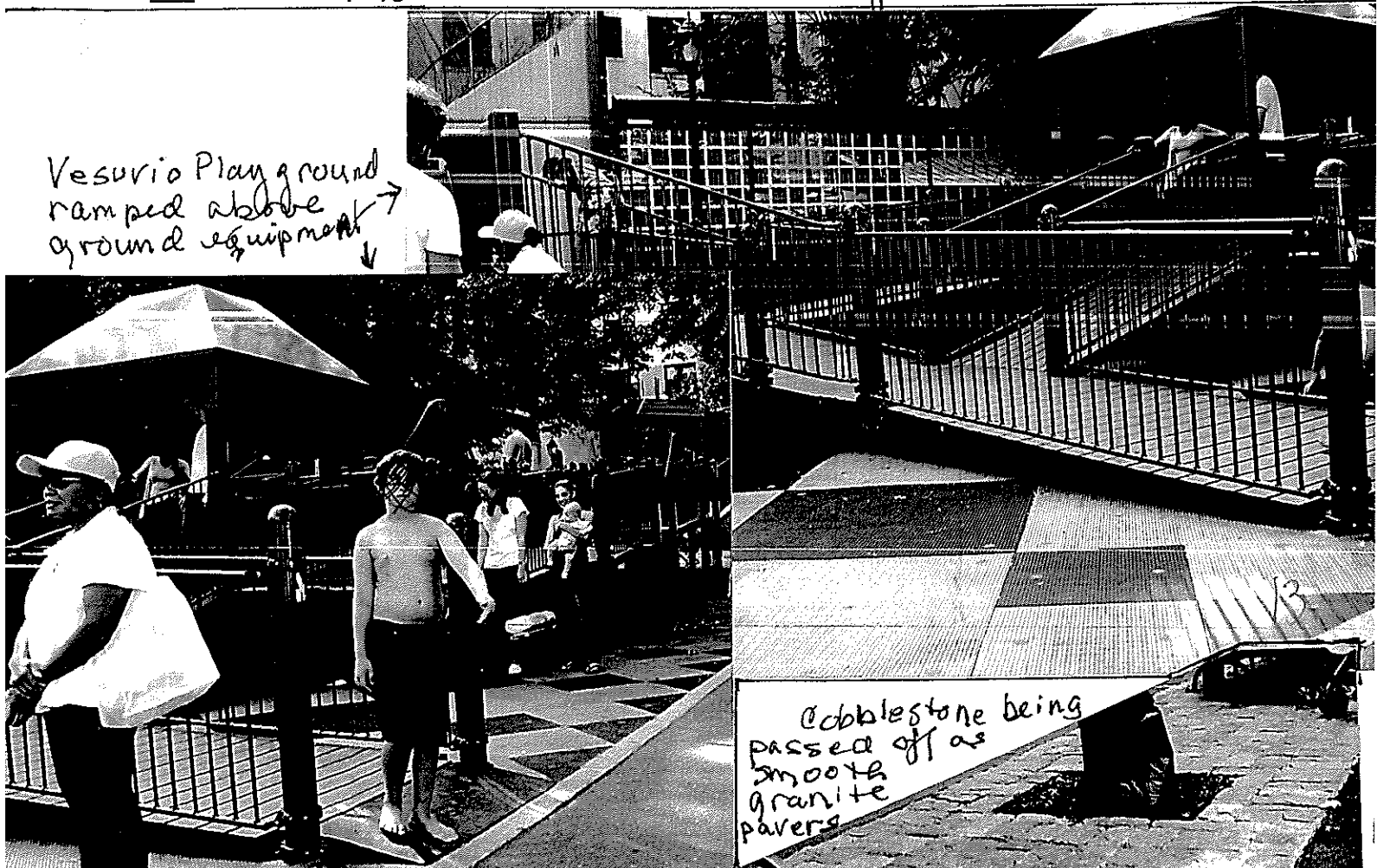
Q.2 How many of these schoolyard conversions to playgrounds per borough will have above ground ramped play equipments?

Ans: Queens-3, Brooklyn-2 and Staten Island-1.

*only 6 out of 257 are currently
= scheduled for access. play
equipm
ramps*

Q.3 How many of these new playgrounds per borough will be American with Disabilities Act accessible?

Ans: All the new playgrounds will be ADA accessible. - entry



*Vesuvia Playground
ramped above
ground equipment →*

*cobblestone being
passed off as
smooth
granite
pavers*

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Jeffrey Clark

Address: _____

I represent: NYC PARK ADVOCATES

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 11-23-09

(PLEASE PRINT)

Name: Charles Massi

Address: 365 W. 25th St New York

I represent: Business Association

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Nancy Barthold

Address: Asst Commissioner

I represent: NYC Parks & Recreation

Address: _____

▶ Please complete this card and return to the Sergeant-at-Arms ◀

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 11/23/09

Name: BRUNDA OSTREICHER (PLEASE PRINT)

Address: 841 Broadway #301

I represent: Center for Independence of the

Address: Disabled, NY

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

Name: Victor Calise (PLEASE PRINT)

Address: Asst Accessibility Coordinator

I represent: NYC Parks & Recreation

Address: Asst Comm. Saratoga

Please complete this card and return to the Sergeant-at-Arms

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

Name: MATT STOKES (PLEASE PRINT)

Address: 507 E 125th St

I represent: SEPTA

Address: 847 E 125th St

Please complete this card and return to the Sergeant-at-Arms