

Cambridge Commission for Persons with Disabilities (CCPD)

Minutes for Thursday, July 14, 2011

Present:

Members: Elizabeth Dean-Clover, Miriam Cooper, Sandy Durmaskin, JoAnn Haas, Eileen Keegan Bongiorno, Alissa Land, Rachel Tanenhaus, Kathy Watkins, and Dave Wood.

Alternates: Don Summerfield

Staff: Michael Muehe and Kate Thurman

Absent: Bet MacArthur, Naomi Pinson, and Gordie Slater.

Guests: Ken Bowles, Cambridge Resident; Kelly Downes, Cambridge Police Department; John Nardone, Assistant Commissioner for Operations, DPW; and Lisa Peterson, Commissioner, DPW.

Minutes:

A motion to approve the June 9 minutes was passed by the Commission.

Announcements:

Kate Thurman said that Cambridge Works, a transitional jobs program offered by the Cambridge Office on Workforce Development, is seeking applications for their fall session from Cambridge residents between 18 and 35 years old who do not have a college degree and who have had problems finding a job due to limited skills, no work experience, a criminal record, or a substance abuse history. This program offers a 13-week job placement, support from a case manager, weekly job readiness classes, and one year of job placement assistance. [Editor's note: for more information, contact Michele Scott at 617-349-7741 or Michael Merullo at 617-349-7743].

Elizabeth Dean-Clover announced that the Peer Employment Network in Boston, sponsored by the Employment Now Coalition and Work Without Limits, will be holding an event on July 18 from 3pm to 5pm for persons with disabilities to network and learn about career advancement and reasonable accommodations. This event will be held at 31 Bowker Street in Boston, near the Haymarket MBTA Station.

Update on Sidewalk Obstruction Issues:

Michael Muehe reported that CCPD has had ongoing discussions with the Department of Public Works (DPW) regarding sidewalk issues, including snow and ice removal, and that DPW has been working closely with the Commission to resolve winter challenges of keeping sidewalks clear. He said that the discussions have also included the Department of

Traffic, Parking, and Transportation (TPT) and that there was a lot of improvement in compliance of the snow ordinance by property owners in clearing sidewalks in a more timely fashion, which both DPW and TPT have been working hard to enforce.

Mr. Muehe said that DPW presented at the September, 2010 CCPD meeting their findings on what it would cost for the City to assume responsibility for clearing all 200+ miles of sidewalk in Cambridge. It was estimated that it would cost the City approximately \$750,000 per snowstorm, or about \$17,000,000 per year, and that it would be logistically prohibitive. He said that CCPD inquired in a February, 2011 letter to Lisa Peterson, Commissioner of DPW, about the possibility of City assistance in keeping curb cuts and crosswalks clear of snow and ice.

Mr. Muehe introduced Ms. Peterson and John Nardone, Assistant Commissioner for Operations. Ms. Peterson said that they have been working very hard on a lot of different efforts for keeping clear sidewalks for many years, including educating property and business owners of their obligations to clear snow and ice from sidewalks abutting their properties, and enforcing the snow ordinance.

Initiatives include:

- The snow hotline, allowing people to anonymously report unshoveled sidewalks online or by phone [editor's note: messages may be left year-round at 617-349-4903 to report blocked sidewalks, including unshoveled areas. Complaints may also be made online at <www2.cambridgema.gov/theworks/services/snow/complaint.aspx>].
- Working with the Traffic, Parking, and Transportation Department (TPT) to develop priority routes for snow clearance.
- Snow exemption program for low-income seniors offered by the Council on Aging, in which Department of Human Service Programs staff clear sidewalks.
- DPW clears high-volume bus stops, sidewalks, and ramps after snowfalls of six inches or more.

Ms. Peterson has received a lot of requests to see how DPW can expand their efforts even more, including CCPD's request of removing snow accumulations at street corners, on ramps, and in crosswalks. She explained that it is very challenging to remove significant amounts of snow from street corners, requiring special equipment. However, they are working very hard in trying to figure out how to prioritize routes that are particularly important to keep clear.

Ms. Peterson handed out a list of criteria to be used to identify priority areas and asked for feedback. Specifically, she would like to know of any other factors they should consider.

Once they have developed a fully encompassing list, they will need to work on plans for implementation.

Please see attached document, “Cambridge Public Works and Commission for Persons with Disabilities—July 15, 2011 Discussion of Pedestrian Snow Operations” for more information on the City’s Current Pedestrian-Focused Snow Operations and Proposed Snow Operation Expansion Plans for next winter.

Ms. Peterson said that the City’s contract for snow and ice removal will be going out to bid in September and requested feedback on their proposal by September 1, 2011.

JoAnn Haas mentioned the importance of keeping designated disability parking spaces clear of snow, noting that snow is often dumped in these spaces. Ms. Peterson reported that DPW works very hard to prevent this from happening, noting that private contractors tend to dump snow into empty parking spaces, which sometimes happen to be disability parking. Ms. Peterson said that she spoke with the Cambridge Business Associations last year about the importance of maintaining accessible parking.

Ms. Haas asked CCPD Members to email her by July 25 with a list of any sidewalk potholes they come across so that may compile a list for DPW to fix prior to the snow season. (Editor’s note: sidewalk maintenance issues may also be reported online at www.cambridgema.gov/theworks/ourservices/streetandsidewalkmaintenance/aboutstreetandsidewalkmaintenance.aspx).

Action Items:

- Elizabeth Dean-Clover and JoAnn Haas will draft a letter in response to DPW’s Proposed Snow Operation Expansion Plans. [See attached]
- CCPD Members will email JoAnn Haas by July 25 with a list of potholes in sidewalks that need to be fixed prior to the snow season. Ms. Haas will forward the final list to DPW.

Police Community Liaison Update: Kelly Downes reported speaking with Deputy Superintendent Jack Albert about the barricades that were placed in the Fresh Pond parking lot between the Dunkin Donuts and Trader Joes. She said that the owner of the Dunkin Donuts had the barricades installed to keep Trader Joes customers from using his parking spots, and that he has been informed by the Cambridge Fire Department that the barricades are in violation of fire code and that he will be fined \$100 per day that the barricades remain. Ms. Downes will provide an update on this issue at the September CCPD meeting.

Action Item:

- Kelly Downes will check on the on the status of barricade removal in the Fresh Pond parking lot of Dunkin Donuts and provide the Commission with an update at the September meeting.

Community Access Update: Sandy Durmaskin reported on the Fresh Pond Shared Use Public Engagement Process Recommendations, stating that the final report was issued on June 15, 2011. [Editor's note: this report and other related documents may be found online at <http://cbuilding.org/freshpond>].

Ms. Durmaskin said that the final report does not include most of the accessibility issues that were brought up by CCPD members during public meetings on the shared use of Fresh Pond, which were facilitated by a private consulting firm. Suggestions that were left out include:

- Using person-first language, and "disability" instead of "handicap"
- Including "except for service dogs" on signage indicating areas of the Reservation where dogs are not permitted.
- Specific language that was provided on etiquette in approaching service animals.
- An awareness of hidden disabilities and differences in speed of travel, whether walking, running, bicycling, or off-leash dogs.
- Maintaining accessible paths year-round and noting accessible routes from each entry point.
- Addressing issues of known non-compliance with the Americans with Disabilities Act (ADA). Ms. Durmaskin noted that the Cambridge Water Department decided to defer making plans to correct ADA compliance violations until the public use engagement process was completed and that the Board plans to use another process in November or December, 2011 to address implementation plans.

Ms. Durmaskin reported that written comments on the report are due by August 20.

A motion to authorize Ms. Durmaskin to work with Michael Muehe and Kate Thurman to draft a letter addressing these issues was passed by the Commission.

Action Item:

- Ms. Durmaskin will work with office staff to draft a written response to the Fresh Pond Shared Use Public Engagement Process Recommendations. [See attached copy of email dated August 19, 2011].

[Editor's note: the topic of visitability was tabled due to time constraints].

Chair's report: Elizabeth Dean-Clover thanked Sandy Durmaskin and Don Summerfield for attending the public meeting of the Kendall Square Advisory Committee. She said that the meeting went very well. The next meeting will be held on Thursday, July 21 and is open to the public.

Annual October Disability Employment Awareness Month Event:

Ms. Dean-Clover said that this year's event will be held in the evening, most likely in the City-Wide Senior Center, City Hall Annex, or the Main Library. The event will be cross-disability in nature and will most likely have an overarching theme of communication. Including a panel presentation comprised of experts on topics such as disclosure and the use of technology in employee-employer interactions was discussed.

Mr. Muehe noted that the City of Cambridge Employees' Committee on Diversity partners with CCPD and the Department of Human Service Programs on the Annual October Events, providing both staff support and funding.

Action Item:

- The sub-committee will meet to discuss next steps.

Executive Director's Report: Michael Muehe reported said that he and Kate Thurman are planning an Orientation session for the new CCPD members. This will occur in early August and all members are invited to participate.

He reported that the MBTA has developed a process to consider consolidating some bus stops. He said that he is looking at this very closely.

Mr. Muehe also said that he and Kate Thurman met with a representative from the Massachusetts Department of Transportation (DOT) last month to discuss renovations to the Anderson Memorial Bridge. He noted that DOT is planning on rebuilding an existing staircase for pedestrian access, but are not planning on providing a ramp in the same location. They will likely apply for a variance from the Massachusetts Architectural Access Board.

He reported that he and Kathy Watkins gave a presentation entitled "Constructing Sidewalks for All Users" at a recent conference. A copy of the PowerPoint presentation is on the CCPD website.

In Bet MacArthur's absence, Mr. Muehe reported that the next screening of the Disability Reframed Community Film Series will be "The Waterdance," which will be held on Saturday, August 6. This feature film documents a few men going through rehabilitation

following spinal cord injuries. John Kelly, Chair of the Boston Commission for Persons with Disabilities and founder of the Neighborhood Access Group will be the guest speaker.

Project Coordinator's Report: Kate Thurman reported giving a presentation at the Annual Cambridge Taxicab Medallion Owner's Meeting on the change in definition of "service animal" under the Americans with Disabilities Act (ADA). She said that she emphasized the legal requirement of allowing customers with disabilities (PWD) who use service animals access to their taxicabs, and that drivers who have severe allergies to dogs must submit written medical documentation to be kept on file at the License Commission and must drive only those cabs that have partitions. Because partitions separate the driver from the passenger compartment, under no circumstances are drivers permitted to refuse rides to PWD who use service animals on the basis of allergies. She also reminded medallion owners that they can be held responsible for ADA violations by their taxicab lessees. She emphasized that most drivers want to do the right thing, and that the few who don't make things difficult for everybody else. She invited attendees to contact the CCPD office with any questions or concerns.

Ms. Thurman informed members that the CCPD office will be undergoing refurbishing at the end of August, necessitating a temporary week-long move to another accessible location to be determined.

She also passed around a sign-up sheet for volunteer shifts to help with the *AccessLetter* mailing, noting that the students who normally do the bulk of it are on summer vacation.

Meeting adjourned at 7:28 pm.

Respectfully Submitted,
Kate Thurman, Disability Project Coordinator

Attachments:

- Cambridge Public Works and Commission for Persons with Disabilities—July 15, 2011 Discussion of Pedestrian Snow Operations
- Letter to Lisa Peterson and John Nardone dated August 23, 2011 with CCPD feedback regarding DPW's proposed Pedestrian Snow Operations Prioritization Process
- August 19, 2011 email: "Comments re: Fresh Pond Shared Use Public Engagement Process"

City’s Current Pedestrian-Focused Snow Operations

18 miles of City-Cleared Sidewalks/ Curb Ramps—	
<ul style="list-style-type: none"> — Operation starts during storm, can continue for days or weeks after storm. — Involves hand crews and mechanical equipment. 	
▪ Abutting schools, public buildings	
▪ Major squares	Includes Harvard, Central, Porter, Kendall, Lechmere
▪ Abutting all parks	Includes Fresh Pond, Danehy Park
▪ City-owned parking lots and garages	
▪ Residential exemption program	For qualified low-income homeowners who are elderly or have a disability
▪ High-volume bus stops — Includes proximate crosswalks and ramps. — Routes include 200 stops (2/3 of total in city)	Routes include: — Cambridge Street- Lechmere station to the Cambridge Common — Massachusetts Avenue - Memorial Drive to the Arlington Line — Concord Avenue - Cambridge Common to Fresh Pond Parkway — Mt. Auburn Street - Belmont line to Massachusetts Ave
▪ Snow Removal	On a limited basis after major events and/ or significant accumulation.
▪ Collaboration with Key Partners	Including MBTA, DCR, Universities, large property owners.
Enforcement Efforts—	
<ul style="list-style-type: none"> — City Ordinance requires property owners to remove snow from sidewalks next to their property or business within 12 hours of daytime snowfall and before 1:00 pm when it has fallen overnight. They must also remove or melt all ice within 6 hours of the time it forms. — New web-based complaint form allows for more efficient delegation, tracking of inspection. — During the 2010 snow season, the City received 2,363 complaints and issued 1,220 tickets. — Highly visible, orange hang-tag posted at cited properties, owner is sent ticket and informational brochure. 	
Priority Routes	Traffic Department enforces based on citation data, as well as proximity to senior housing, schools, T stations and major bus routes
Complaint Inspection	Public Works inspects locations not on priority routes
Education—	
<ul style="list-style-type: none"> — Redesigned website, updated brochures. — Have done outreach by mail (with all water bills), via e-mail (e-line), newspaper press releases, and in collaboration with — Have collaborated with businesses associations and community groups. 	

Public Works' proposed snow operation expansion plans for next winter: *Clear ramps at corners and bus stops on prioritized routes after significant snow accumulation (generally 6 inches or more) within 3-4 days from the end of a storm (if back to back storms, from the end of last storm).*

Factors considered in prioritization process:

1. Bus routes (a general indicator of high pedestrian and vehicular activity)
2. Proximity to:
 - a. public and private school property
 - b. libraries
 - c. youth centers
 - d. senior centers and Elderly housing
 - e. Galleria and Twin City Mall
 - f. 100' buffer of MBTA subway stops

Using this prioritization process, Public Works is evaluating the possibility of:

1. Expanding our efforts on the high-volume bus stop streets we already clear to include all corner ramps:
 - a) Cambridge Street- Lechmere station to the Cambridge Common
 - b) Massachusetts Avenue - Memorial Drive to the Arlington Line
 - c) Concord Avenue - Cambridge Common to Fresh Pond Parkway
 - d) Mount Auburn Street - Belmont line to Massachusetts Avenue
2. Adding additional streets where we would clear bus stops and corner ramps:
 - a) Western Avenue
 - b) River Street
 - c) Huron Avenue – Concord Avenue to Fresh Pond Parkway
 - d) Rindge Avenue
 - e) Broadway
 - f) Prospect Street- Cambridge Street to Massachusetts Avenue
 - g) Pearl Street
 - h) Brookline Street
 - i) Green Street- Brookline Street to Western Avenue
 - j) Granite Street
 - k) Aberdeen Avenue

For discussion:

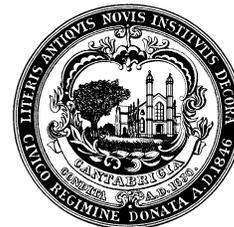
1. Does this approach to prioritizing locations make sense?
2. Given this method of prioritizing, do we include the most critical pedestrian areas?
3. If we were to have to use a phased approach to implementing this new program, what do you see as the most important criteria/ locations to keep in mind?

City of Cambridge

Commission for Persons with Disabilities

51 Inman Street · Cambridge, MA · 02139-1732

617-349-4692 voice · 617-492-0235 TTY · 617-349-4766 fax



Elizabeth Dean-Clower
Chair

August 23, 2011

JoAnn Haas
Secretary

Lisa Peterson, Commissioner

Miriam Cooper
Sandy Durmaskin
Eileen Keegan Bongiorno
Alissa Land
Bet MacArthur
Naomi Pinson
Rachel Tanenhaus
Kathy Watkins
Dave Wood
Gordon Slater,
Youth Ambassador

John Nardone, Assistant Commissioner of Operations
Cambridge Department of Public Works
147 Hampshire Street
Cambridge, MA 02139

Michael Muehe
*Executive Director/
ADA Coordinator*

Kate Thurman
Project Coordinator

Dear Lisa and John:

Thank you for coming to our recent CCPD meeting and for your presentation. We all really appreciate DPW's willingness to enhance efforts to clear snow and ice from certain prioritized curb ramps in the City. The prioritization process you described makes a great deal of sense to us. Because this project is still in the conceptual phase, you asked that we send you any suggestions by September 1. The following is a summary of our recommendations.

1) **Curb Ramps:** You mentioned that the curb ramps in priority areas may still take 3-4 days to be cleared by DPW following a snowstorm. We expressed concern that this timeframe may allow any snow and ice on ramps to freeze into a solid mass, making it much more difficult to remove. You indicated that, since DPW would be using bobcats and similar mechanized equipment that can cut through the ice/snow much more effectively than hand shovels, this would help mitigate that problem. We also understand that property owners adjacent to street corners, like all other property owners, would still need to follow the directives of the City's snow ordinance.

2) **Snow Hotline Online Form:** In addition to this enhanced effort by DPW to remove ice and snow, on the DPW online snow removal request form, could you provide a new category which would allow a resident to specify whether the curb ramp is obstructed with snow and ice? We believe it would also be helpful if both the telephone hotline and online systems could keep a record of problem curb ramps, so these could be tracked from month to month and year to year. If such problem ramps are already situated in one of the prioritized areas, then DPW would clear them, in accordance with the new policy. If such problem ramps are not already in priority areas, tracking them would help to decide whether they should be included for possible prioritization in the future. Please let us know whether you think such data collection, leading to possible prioritization adjustments would be feasible and useful. In the meantime, if corner addresses could somehow be highlighted on the snow removal request form, so that property owners adjacent to street corners can be notified that they need to clear the snow, this would help improve all of our efforts.



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3) **Snow Hotline Telephone Number:** The DPW Snow Hotline phone number was not listed on last year's printed snow brochure. You mentioned that it would be included this year, and we appreciate that. We would also appreciate seeing a draft copy of the updated brochure as soon as it is available. It would also be very helpful if both the Hotline number and the online DPW complaint form were easier to spot on the website: www.cambridgema.gov/snow.

4) **Sidewalks and Crosswalks:** We would greatly appreciate it if training and other operational procedures could be implemented to ensure that when DPW workers are clearing the curb ramps under this new policy, they will make every effort to keep the adjacent sidewalks and crosswalks clear and accessible.

5) **Snow in Designated Disability Parking Spaces:** Under no circumstances should designated disability parking spaces have snow plowed into them or otherwise be used as snow/ice depositories. Private snow removal vendors may be tempted to do this when they see an open disability parking space, but there should be mechanisms in place to minimize this from occurring, and to ensure that DPW is notified when this happens. Can DPW adjust its contracts with private snow removal vendors to ensure that disability parking spaces are not used as snow depositories, and require that other private vendors operating in the City also comply with this mandate?

6) **Snow on Sidewalks Next to Designated Disability Spaces:** When snow and ice accumulate curbside, adjacent to on-street designated disability parking spaces, this blocks access to vehicle doors and trunks, often rendering those parking spaces unusable by people with disabilities. While DPW crews are clearing snow on sidewalks adjacent to City schools and other municipal buildings and facilities, can they make extra efforts to ensure that the curbside snow and ice adjacent to disability parking spaces at these facilities is also removed? We also are in the process of making private business owners aware of the necessity to keep these areas clear.

Please let me know if you have any questions or need further clarification regarding any of these recommendations.

I also particularly want to thank JoAnn Haas, who has spearheaded this effort on behalf of CCPD. She is in the process of organizing a brown bag lunch meeting to be held on Thursday, October 6 from 1:00 to 2:30 PM in the 4th Floor of City Hall Annex with representatives from DPW, the Pedestrian Committee, Green Street Initiatives, the USPS, local businesses, and the neighborhood associations. Later this summer, JoAnn will be sending an e-mail invitation with

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more details about this meeting. The goal is to create a collaborative effort in which we all contribute to making Cambridge sidewalks and ramps fully accessible all year round.

Thanks again for your time and support on this matter that greatly impacts both safety and accessibility for individuals with disabilities.

Best regards,

A handwritten signature in black ink that reads "Elizabeth Dean-Clower". The signature is written in a cursive style with a long horizontal flourish at the end.

Elizabeth Dean-Clower
Chair

cc: Michael Muehe, CCPD Executive Director/ADA Coordinator

From: Muehe, Michael
Sent: Friday, August 19, 2011 12:18 PM
To: 'msciarrio@cbuilding.org'; 'freshpond@cbuilding.org'
Subject: Comments re: Fresh Pond Shared Use Public Engagement Process

Dear Ms. Sciarrio,

Thank you for the opportunity to comment on the Fresh Pond Shared Use Public Engagement Process Recommendations, dated June 15, 2011.

As you know, Sandy Durmaskin, Board Member of the Cambridge Commission for Persons with Disabilities (CCPD), forwarded to you on March 16, 2011 our recommendations for changes to the February 16, 2011 Draft List of Norms and Expectations by Use/User Group (see below). Ms. Durmaskin also offered many other suggestions and comments throughout the public engagement process regarding the use of Fresh Pond by persons with disabilities.

Frankly, we are disappointed that the expressed interests of this identified user group, people with disabilities, are largely absent from the final report, and we respectfully request that the following comments be documented for the record:

- The final report implies that there was little input from persons with disabilities, when in fact, five of the seven meetings were attended by at least one CCPD member, who verbally offered specific suggestions, in addition to providing written comments, such as those below. Two persons with disabilities signed up as CORE volunteers at the first meeting and a third gave contact information and volunteered to review materials and give input. The CBI represented at the first meeting that they would “do outreach to underrepresented groups.” If the CORE volunteer dropped out after the first CORE meeting, why was there no outreach to persons with disabilities to fill this gap?
- Requirements as legally mandated by the Americans with Disabilities Act (ADA) and the Massachusetts Architectural Access Board (521 CMR) are not included and prioritized in the report. Ten years after City Council approved the Fresh Pond Master Plan, there remains no implementation plan or timetable. For example, is there a plan to level/widen/maintain paths that are not ADA-compliant? This should be prioritized, to comply with law and for safety and access of all users. It should also be noted that the only pathway that is accessible to persons year round is designated as an off-leash area for dogs, giving many persons with disabilities needing to avoid canine contact no other options.
- There is no mention of service dogs. For example, policies and signage indicating areas where no dogs are allowed must contain language such as “except for service animals.” In addition, the report’s suggestions on how to approach and interact with dogs are not appropriate for service animals. As offered in our comments of March 16, specific

language such as "Get permission from a person with a disability before approaching or interacting with his/her service animal" should be included in the report.

- The last bullet point under "Norms of Behavior" on page 7 should be changed to "to provide equal access to seniors and persons with disabilities and to ensure full compliance with accessibility laws and regulations" and "to provide for children" should be a separate bullet point.

Thank you very much for your consideration of these recommendations. If you have any questions, please do not hesitate to contact me.

Best Regards,

Michael

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Michael J. Muehe
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From: "Meredith Sciarrio" <msciario@cbuilding.org>
To: Sandy Durmaskin
Cc: "Michael Muehe" <mmuehe@cambridgema.gov>
Sent: Monday, March 21, 2011 3:48:57 PM
Subject: Re: Fresh Pond Draft Norms and Expectations

Sandy,

Thank you for sending in Michael Muehe's comments to the draft norms for Fresh Pond. We appreciate his perspective in this process and will note these comments moving forward.

We hope that you can attend our next Fresh Pond meeting on Wednesday April 13, 6:15pm at the West Cambridge Youth Center.

Best regards,
Meredith

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Meredith Sciarrio

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On Mar 16, 2011, at 3:08 pm, Sandy Durmaskin wrote:

Hi Meredith. I am unable to attend tonight, but plan on attending future meetings. I reviewed the norms and expectations draft with Michael Muehe, Executive Director/ADA Coordinator Cambridge Commission for Persons with Disabilities. Here are his suggestions for revisions to the draft:

"I would suggest changing the overall bullet point to read: "Be considerate to all users, including seniors and people with disabilities."

Although individual opinions vary, if you talk to the Council on Aging, they will tell you they prefer "seniors" to "elderly". I would recommend replacing the word "elderly" with "seniors" wherever it appears in this document.

The bullet point "Encourage respect and safety for dogs and elderly" is awkwardly worded and unclear – perhaps it would be better to say "Encourage respect and safety for seniors and their dogs."

I would suggest changing "Possibly exclude dogs from Lusitania Meadow..." to "Possibly exclude dogs (except service dogs) from Lusitania Meadow..."

Under "Persons with Disabilities – Path Etiquette", I would suggest changing "Be aware of differences in speed, perception, response time, and stamina" to "Be aware that many people have hidden disabilities – be aware of differences in speed, perception, response time, and stamina."

Similarly, change "Don't approach/interact with service animals" to "Get permission from a person with a disability before approaching or interacting with his/her service animal.""

Thank you for your consideration.

Of course, one of the primary expectations is that the park is designed, constructed, and maintained year round in compliance with all applicable laws, including access laws. This includes providing level clear paths, access for service animals anywhere a person is permitted, etc. Best regards, Sandy Durmaskin