



February 16, 2024

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Filed At: <https://accessibilityplans.cityofnewyork.us/dsny/>

Re: Draft of New York City Department of Sanitation Proposed Five-Year Accessibility Plan, Posted On Or About December 29, 2023

Dear Mr. David,

Disabled In Action of Metropolitan New York, Inc. ("DIA") submits these comments in response to the New York City Department of Sanitation's ("DOS") request for comments concerning its Proposed Five-Year Accessibility Plan ("Plan"), posted online on or about December 29, 2023.

DIA is a fifty-one (51) year old, 501(c) (3), grassroots, civil rights organization run by and for people with disabilities. DIA's mission is to eliminate discrimination for people with all kinds of disabilities.

Significantly, there is nothing in the DOS Plan about how services provided by the Department of Sanitation specifically comply with the ADA and other civil rights laws with respect to the public, such as snow removal, placement of trash receptacles, and the cleaning of streets.

For instance, we are concerned about garbage receptacles that will be in the street for residential and/or commercial garbage disposal. We need to be able to reach them. Now, garbage cannot be put out until after 8 p.m. if it is not in a receptacle. What if a person with a disability needs someone else to put it out and they are not available that late? This Plan needs to discuss whether an exception be made in such instances and how can a person request that this exception be made for them.

So too, addressing snow removal, we know that property owners are responsible for snow removal, but when there is a heavy snowfall, the plows push the snow onto the pedestrian ramps and bus stops. You need to figure out a workable way to keep the pedestrian ramps and bus stops clear after a snowstorm.

Thus, this Plan needs to discuss in greater detail the procedures the DOS has or does not have in place to provide people with disabilities access equal to other members of the public with respect to its programs, activities and services.

The DOS Plan needs to provide more information how DOS ensures that public meetings are held in locations with truly accessible entrances and restrooms as well as how it provides effective communication at meetings, events and on social media and its website.

Finally addressing Workplace Inclusion of the DOS Plan, this Plan needs to include an emergency evacuation plan for both employees with disabilities and visitors with disabilities. All DOS staff need to be trained on what to do if a disabled person needs to evacuate in an emergency. We suggest that you allow employees to self-identify if they require assistance and be sent

an email from the Fire Safety person each day to account if they are physically in the office. That way, no one will be looking to help someone who is not there. All employees need to be trained on how to evacuate people with different disabilities in emergencies and trained on how to safely transfer a person to an evacuation chair and how to safely operate an evacuation chair.

DOS needs to have an evacuation chair in a location easily accessible and very near to the workstation/office of self-identified employees with mobility disabilities. An additional evacuation chair that could be used by other employees and visitors in an emergency evacuation should be located in a visible and easily accessible place on every floor DOS occupies.

Finally, the DOS Plan should state that the DOS will post signage instructing visitors on what to do in the case of an emergency in an easily seen location, in large print and Braille. So too, the DOS Plan needs to state the date by which this will be accomplished.

Thank you for the opportunity to comment on this Plan since equal access to all New York City's services, activities and programs is important to all New Yorkers. If you would like additional information or have any questions, please do not hesitate to contact DIA at info@disabledinaction.org or president@disabledinaction.org.

Thank you for your continued work on behalf of all of us.

Very truly yours,

Jean Ryan,
President,
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