



CITY HALL

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DATE: August 5, 2025

TO: City Council

FROM: Pamela Caronongan, City Administrator; and Aaron Brusatori, City Engineer

RE: DISCUSS, CONSIDER, AND ADOPT RESOLUTIONS APPROVING THE AMERICAN DISABILITIES ACT (ADA) GRIEVANCE AND COMPLAINT PROCEDURE, THE ACCEPTANCE AND APPROVAL OF THE ADA SELF-EVALUATION, THE DESIGNATION OF A CITYWIDE ADA LIAISON OFFICER, AND THE DESIGNATION OF A CITYWIDE DBE LIAISON OFFICER

RECOMMENDATIONS

Staff recommends the City Council consider the following:

1. Adopt **Resolution No. 25-58**, thereby approving the ADA Grievances and Complaint Procedure.
2. Adopt **Resolution No. 25-59**, thereby designating the City Administrator as the American Disabilities Act (ADA) Liaison Officer for the City of Angels.
3. Adopt **Resolution No. 25-60**, thereby designating the City Administrator as the Disadvantaged Business Enterprise (DBE) Liaison Officer for the City of Angels.
4. Accept and approve the ADA Self-Evaluation completed by staff dated June 22, 2025.

BACKGROUND

The Americans with Disabilities Act (ADA) is a civil rights law that prohibits discrimination against individuals with disabilities in all areas of public life, including jobs, schools, transportation, and all public and private places that are open to the public. The purpose of the law is to make sure that people with disabilities have the same rights and opportunities as everyone else.

As part of the Federal Highway Administration (FHWA) regulatory requirements under Title II of the ADA and Section 504 of the Rehabilitation Act of 1973 (504), Caltrans ensures that subrecipients of Federal aid and State and local entities that are responsible for roadways and pedestrian facilities do not discriminate on the basis of disability in any highway transportation program, activity, service or benefit they provide to the public; and to ensure that people with disabilities have equitable opportunities to use the public rights-of-way system.



All public entities are required to complete a self-evaluation. However, only those that employ 50 or more persons are required to maintain the self-evaluation on file and make it available for public inspection for at least three years pursuant to 28 CFR 35.105(c). Other public entities are not required to retain their self-evaluations but are encouraged to do so because these documents are evidence of a public entity's good faith efforts to comply with ADA requirements.

DISCUSSION

Caltrans Local Assistance Requirement: As part of the required annual Disadvantaged Business Enterprise (DBE) Certification, Caltrans Local Assistance requires Local Public Agencies to prepare and adopt an ADA Grievance/Complaint Procedure and complete a Self-Evaluation every three years as part of the annual Disadvantaged Business Enterprise (DBE) Certification.

The City must designate both an ADA and DBE Liaison Officer.

Exceptions For Small Agencies: Because the City of Angels Camp has less than 50 employees, it is not required to identify an ADA Liaison Officer and it is not required to prepare and ADA Transition Plan. Regardless of size all agencies must conduct an ADA Self-Evaluation and adopt an ADA Grievance/Complaint Procedure.

Self-Evaluation: Local Public Agencies (LPA) are required to complete a self-evaluation of current programs, policies, and practices to identify barriers for people with disabilities pursuant to 28 CFR 35.105, 49 CFR 27.11(c)(2), and Section 504 of the Rehabilitation Act of 1973. The scope of the self-evaluation includes both architectural and administrative barriers. The LPA must provide an opportunity for interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the self-evaluation process by submitting comments. Critical areas to evaluate as part of a self-evaluation must accomplish the following, but are not limited to:

- Identify all programs (including public right-of-way facilities), activities, and services and their locations.
- Determine whether employees and officials are familiar with the public entity's ADA obligations, including the requirement to make reasonable modifications to policies, practices, and procedures.
- Determine whether employees and officials know how to arrange for auxiliary aids and services, such as sign language interpreters, material in Braille, and assistive listening systems; to ensure that communication with people with disabilities is as effective as others.
- Review service, activity and program's policies and procedures to determine whether they ensure an equal opportunity for people with disabilities to participate and benefit.



- Survey facilities and determine whether there are physical barriers to access programs. If non-structural changes, such as moving programs, should be made, include them in the self-evaluation. If structural changes are needed, include them in the transition plan.

The ADA Self-Evaluation and ADA grievance/Complaint Procedure were completed on July 22, 2025 and is provided as an attachment to this staff report.

FISCAL IMPACT

Approximately \$750 in staff time to complete the DBE and ADA forms required for the annual Caltrans Coordination.

ENVIRONMENTAL CONSIDERATION

The above-mentioned action is exempt from California Environmental Quality Act (CEQA) review via CEQA Guidelines 15061(b)(3) since said action is not a “project,” and that the activity does not cause a direct change, indirect change, or significant effect on the environment.

ATTACHMENTS

1. Draft Resolution 25-58 – ADA Grievance and Complaint Procedures
2. Draft Resolution 25-59 – Designate City Administrator as ADA Liaison Officer
3. Draft Resolution 25-60 – Designate City Administrator as DBE Liaison Officer
4. ADA Grievance/Complaint procedure prepared and dated July 22, 2025
5. Caltrans Local Assistance Form 9-C: Local Agency ADA Annual Certification Form ADA Self-Evaluation for Angels Camp dated July 22, 2025



City Council
August 5, 2025
Approve Construction Change Order No. 002, Mark Twain Water Distribution System Improvements Project

