

From: Wetzel-Moore, Alyssa (CI-StPaul)
Sent: Monday, August 31, 2015 12:36 PM
To: #CI-StPaul_Ward1-7
Subject: Saint Paul Snowy/Icy Sidewalk Ordinance Amendment

Dear Councilmembers,

This email is a comment to the Saint Paul Snowy/Icy Sidewalk Ordinance Amendment because I am unable to attend in person tomorrow.

In my capacity as the City's ADA Coordinator (facilitating accommodations for the public) and Staff Liaison to the Mayor's Advisory Committee for People with Disabilities, I have learned of the substantial hardship uncleared walkways have on people with mobility or balance impairments and other disabilities. When snow is not promptly cleared, people with disabilities are restricted in where they can go, even to the point of being unable to leave their home. It also affects their ability to access transportation, such as the bus or Metro Mobility, which can mean missing their bus to work or school, or being left out in the cold.

As ADA Coordinator, when I receive accessibility complaints about snow removal, I forward the call to the snow removal complaint line, and depend on the existing enforcement system to address the property owner's infraction. This proposed amendment would allow for more prompt resolution of these issues and hopefully deter future violations and result in property owners having a plan for prompt snow removal.

On the other hand, having a disability can limit a property owner's ability to be able to remove snow. The policy and procedures implementing the proposed ordinance should anticipate this challenge, provide a resource list to community, and consider accommodation requests related to the citation. The purpose of any accommodation would be to allow the property owner to comply, not to excuse them from snow removal.

It is also important to consider the impact the enforcement and implementation of this amendment could have on low-income people. People working several jobs or long hours may find it difficult to promptly remove snow or have time to call DSI during their office hours. If these jobs are low wage jobs, the property owner may not be able to afford to pay someone to shovel snow. Time to make a snow removal arrangements with neighbors, family members, or friends, would prevent additional hardship of fines they may be unable to pay, which would result in even greater consequences.

Also important is considering the challenges this amendment may present for people with limited English proficiency (LEP individuals) who may not understand their obligation to remove snow because communications and warning notices are only in English. I assume it is already the plan, but want to emphasize that any notices must comply with LEP requirements by being translated into the three other predominant languages as well as contact information for assistance with other languages. The City's LEP Coordinator could assist to ensure compliance.

Finally, the potential for a disproportionate impact on communities of color should be considered and mitigated. As I mention above, providing a resource list (snow removal assistance for seniors, people with disabilities, neighborhood organizations, etc.), having policies that allow for flexible communication with the property owner (via email, phone call, or letter) to resolve the issue, and consideration of

extenuating circumstances are all important tools to ensure the fair application of this amendment. In fact, they would help increase compliance with the requirements rather than repeated fines and excessive use of DSI services.

Overall, I think this amendment could have a very positive impact on everyone's quality of life and resolve some accessibility issues the disability community faces every winter.

Thank you for your consideration of this comment.

Sincerely,

Alyssa Wetzel-Moore



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