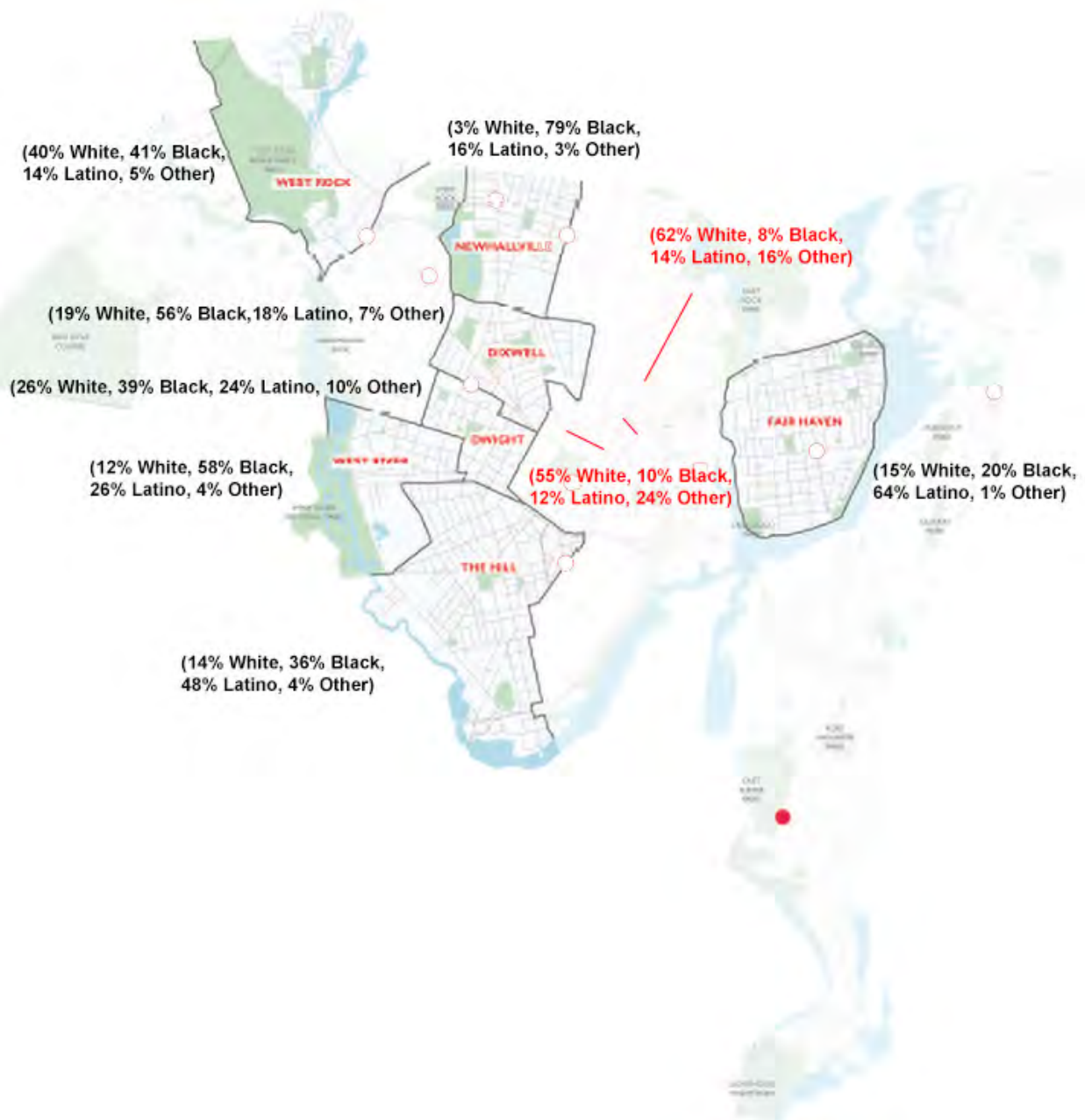


New Haven's Safe Routes for All plan contains 563 instances of "bike" or "bicycle" and 3 instances of "wheelchair." (Strange definition of 'All.')

A member of the Commission on Disabilities is on-record "S. Esposito was involved as a Fair Haven resident but stepped back because she was not convinced that they were taking accessibility issues seriously (they were more concerned about bike lanes)." That is Intentional Discrimination Against the Members of a Protected Class.

The SFRA defines "Priority Neighborhoods to create an equitable implementation framework...These Priority Neighborhoods historically and currently endure disproportionate economic, social, and health disparities."

Two projects that are not in those priority neighborhoods were prioritized above all of the projects that are in those priority neighborhoods. Those have been completed. No accessibility improvements were made. In one of them, none of the pedestrian safety recommendations in the SFRA plan were implemented. A new one that isn't in that plan at all has been proposed. The ethnic demographic data for the priority neighborhoods defined in SFRA and the locations of those three projects is shown below. This is Discrimination on the Basis of Ethnicity. (As a matter of law, intentional or accidental doesn't matter. Discrimination is defined by the result.)



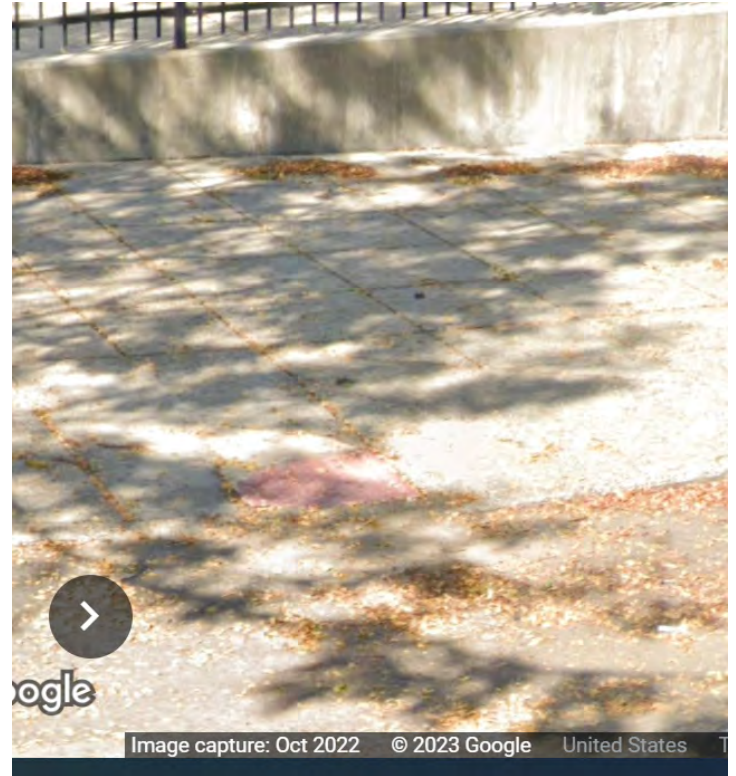
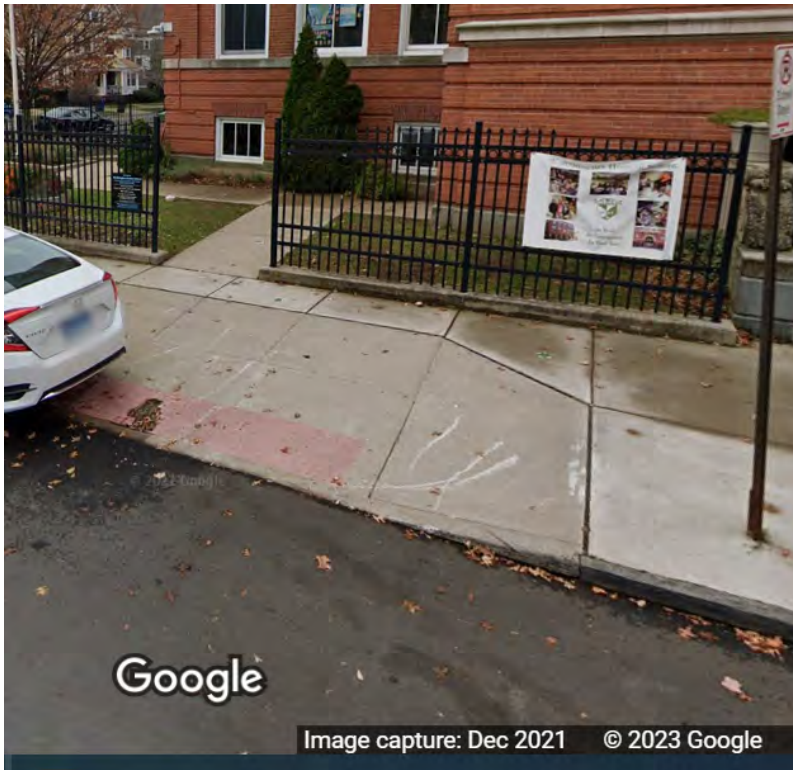
This gentleman is riding his wheelchair in the bike lane that was installed in one of those projects because none of the ADA violations on that street were remediated. One is visible in the foreground. This violates Federal law.



This photo of the Mayor and two Alders enjoying that violation of Federal law in one of those majority-White neighborhoods was published in the New Haven Register. This is Discrimination on the Basis of Ethnicity and Discrimination on the Basis of Disability.



Very similar hazards existed at Hooker Elementary School and LW Beecher School.



**Hooker Elementary School was remediated:**

The ethnic demographics of the neighborhoods those schools are in:

**62% White / 8% Black / 14% Latino / 16% Other**

**LW Beecher School was not:**

**20% White / 55% Black / 18% Latino/ 8% Other.**

This is also Discrimination on the Basis of Disability and Discrimination on the Basis of Ethnicity.



The City of New Haven has ignored Federal law (28CFR35.133) as a matter of policy, leaving accessible parking spaces that serve a public school inaccessible. This was included in my first complaint to the DOJ. The city repaired (or approved the repair of) the sidewalk up to - but not including the inaccessible accessible parking space across the street from a Public School that had been previously reported to the DOJ.



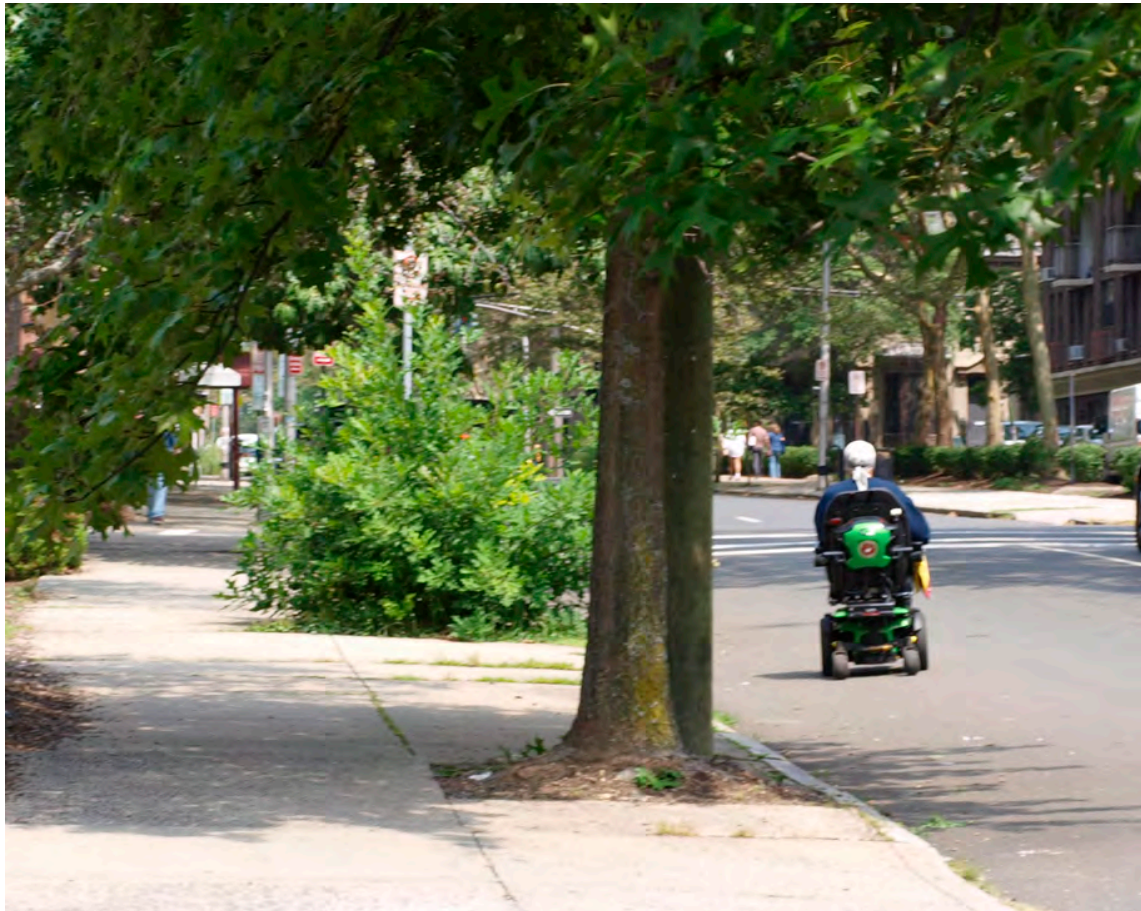
The city invites people to attend Movie Night, when it's dark, so they can trip and fall on these violations of Federal law. That's just dumb - and it violates a Section of the Code of Ordinances that requires compliance with Federal law.



The city will not remove tree stumps unless someone volunteers to water a new tree, so this block will be blocked forever.



People ride their wheelchairs (or walk or jog) in the roadway to get around them.



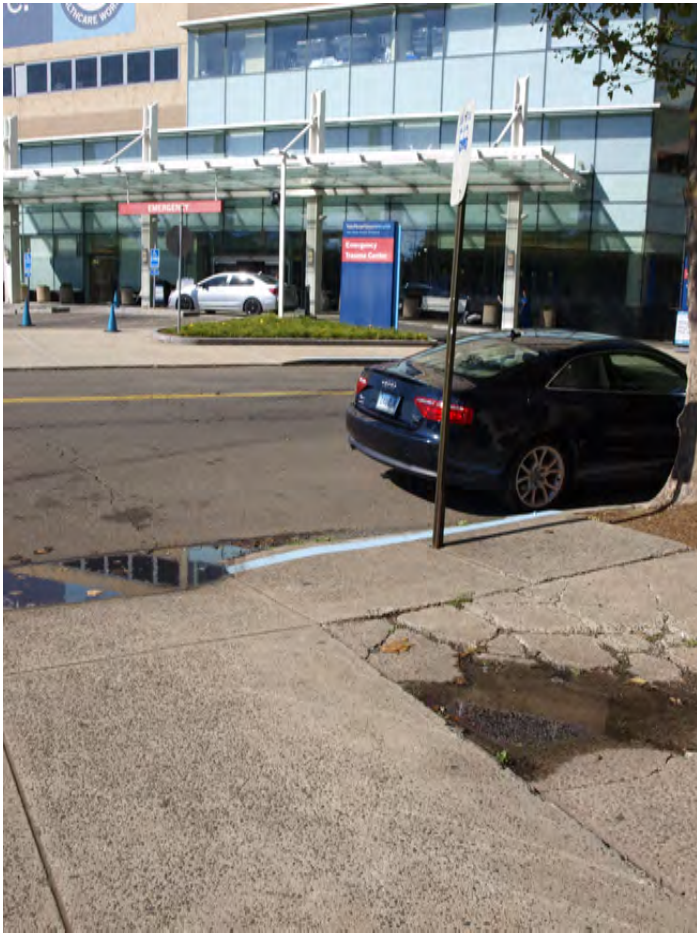
The access ramp to New Haven City Hall is not accessible. A city employee tripped on one of these trip hazards while I was taking these photographs (Sept. 8, 2022 approx. 1:20 PM).

28CFR35.133 Maintenance of accessible features.

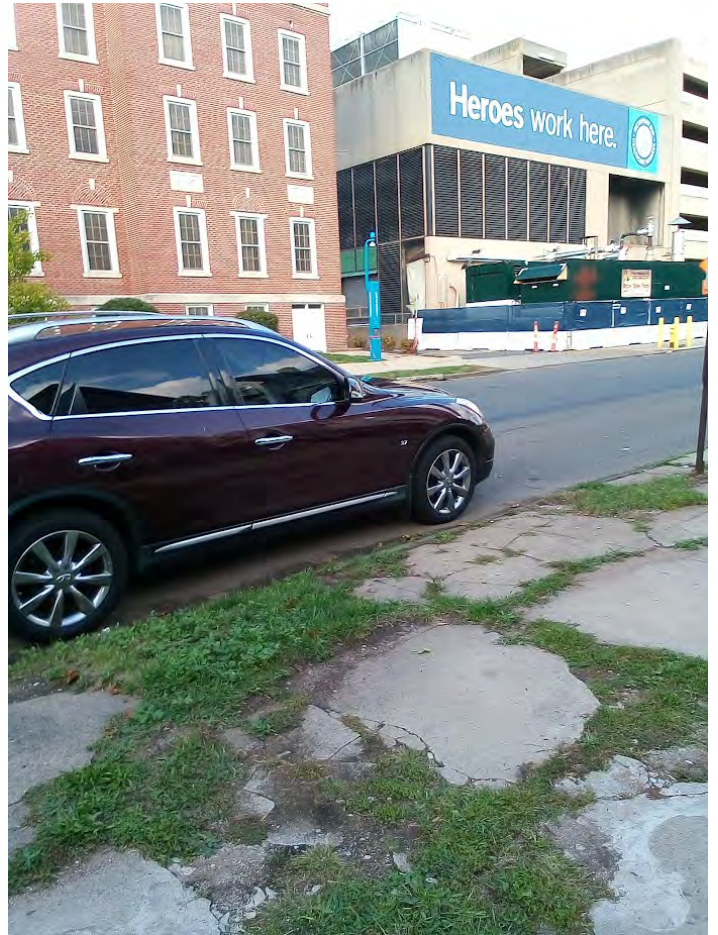
(a) A public entity shall maintain in operable working condition those features of facilities and equipment that are required to be readily accessible to and usable by persons with disabilities by the Act or this part.



We have two hospital campuses. These bus stops are at  
The York St campus



St. Ray's



New Haven's Dept of Public Works considers these to be "remediations."



More than half of New Haven's Public Housing Facilities that have accessible units are surrounded by hazards  
These are on the two sides of Crawford Manor.

