



## Public Involvement

As part of the ADA transition planning process, the Park District reached out to community organizations and individuals with disabilities to ensure the Park District would gain a better understanding of accessibility challenges and priorities.

### Commitment to Accessibility Open House

Two public open houses were conducted in May 2013 to provide information about the Transition Plan, facilities, programs, communications, and to solicit comments from participants on barriers that may prohibit them from using the parks or programs in the Park District. Announcements of the open houses were sent to local newspapers, local government agencies, organizations representing people with disabilities, and current groups that have utilized the Park District facilities and/or programs. The Park District website also highlighted the open houses and included a survey that interested persons could complete on-line (Appendix B).

### ADA Focus Group

Several advocacy groups, whose clients currently use the Park District, attended an ADA focus group on May 16, 2013. The purpose of the focus group was to provide an update on the Transition Plan development and to ask for comments, suggestions, and ideas they may have for partnerships with their organizations. Two agencies were represented at the meeting: Courage Kenny Rehabilitation Institute and Veterans Administration (VA) Health Care. Both of these agencies have already developed a relationship with the Park District and provided valuable information related to communication, services, and programs. Appendix C is a copy of a survey sent to partner organizations who serve person with disabilities and compilation of meeting notes from an agency focus group.

Information from the focus group and the open houses provided valuable input that will be incorporated into the ADA self-assessment and the update of the Transition Plan. As a result of suggestions made during the community engagement process, the Park District will continue dialogue with advocacy groups representing persons with disabilities and work with agency staff to provide outreach presentations, schedule programs, coordinate facility use, and promote use of adaptive equipment.

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## ADA Self-Assessment

The purpose of the self-assessment is to determine existing conditions and the extent to which they are in compliance with the ADA. The self-assessment recommendations also consider comments and suggestions from the public, advocacy agencies, and staff, and are directed toward achieving greater accessibility and a more welcoming environment within the Park District. Information gained through the self-assessment is being used to identify areas of recommended improvements, establish priorities, and develop implementation strategies.

### Communications

#### General Communications

According to Section 35.160(a) of ADA, "...A public entity shall take appropriate steps to ensure that communications with applicants, participants, and members of the public with disabilities are as effective as communications with others." As a public entity, the Park District is committed to providing equally effective communication and reasonable accommodations to individuals with disabilities for communications-related needs. Communications services include:

- TTY and relay services (TTY 763-559-6719);
- Assistive listening devices;
- Sign language interpretation for Public Safety and upon request;
- Building signage in Braille;
- Publications in Braille, larger print, audio tape or computer disk upon request;
- Print publications distributed within reach range;
- Trail signage featuring grade, cross slope, surface type, etc., as information is updated/replaced; and
- Scheduled assistance for program participants with disabilities upon request.

The Park District does its best to fulfill all requests with 14-day advance notice, or on shorter notice whenever possible. A dedicated e-mail address is available to make requests: [access@threeriversparkdistrict.org](mailto:access@threeriversparkdistrict.org). Requests can also be made by calling 763-559-9000 (TTY 763-559-6719).

## Website

The Park District provides a dedicated Accessibility page on its website at <http://www.threeriversparks.org/about/accessibility.aspx>. The webpage offers links to information on upcoming events, including opportunities for public participation in ADA-related planning, as well as to a full listing of adaptive recreation rental equipment. The website also gives instructions on how to request accommodations and initiate grievance procedures.

Although the Park District is not a state agency, and is therefore not required by Minnesota law to comply with Section 508 of the Rehabilitation Act and the Web Content Accessibility Guidelines 2.0, the Park District is taking steps to make its website more accessible per these specifications and guidelines.

The current Park District website was assessed using the Title II Checklist for Website Accessibility from the ADA Best Practices Tool Kit for State and Local Governments. When the Park District's website was last redesigned in 2009, a number of features were included to ensure accessibility. All of the Park District's web pages can be viewed using visitors' web browser and operating system settings for color and font. In addition, photos and graphics have alt tags to describe what is being visually conveyed using text. Staff received training to ensure the accessibility of the website, and the website manager routinely checks the HTML of all new webpages to confirm accessibility before new pages are posted. The website allows screen readers to bypass navigation links so that people using such technology can avoid listening to all of the navigation links each time they move to a new page.

To further test the usability of the website using screen reading technology, in August of 2012, the Park District reached out to a Twin Cities nonprofit organization that serves people with vision loss. Staff from the nonprofit organization asked their clients to perform the same types of tasks on the Park District's website that the Park District previously asked people without vision loss to perform during standard usability testing, plus the additional task of, "Find out who you would contact to request accommodations." These tasks all were successfully performed on the website by people with vision loss through the use of assistive technology (Appendix D).

## Recommendations

- Develop and post a written policy on website accessibility in a place that can be easily located. This policy will put procedures in place to assure a quick response to website visitors with disabilities in instances where difficulty is encountered when accessing information or services available via the website.
- Create and use more descriptive alt tags. While all photos and graphics have alt tags, the Park District will take steps to make these alt tags more descriptive so as to serve as better equivalents to what is being conveyed visually.
- When documents are converted from Microsoft Word documents to Adobe PDFs for use on the website, consistently include accessibility options and consider alternative text-based formats whenever possible. All newly added PDFs will include accessibility options, and previously added PDFs will be re-created to ensure settings default to include accessibility options.

## Program and Outdoor Recreation Services

The Park District provides a variety of outdoor recreation facilities as well as education and outdoor recreation programs to provide enjoyable, healthful outdoor experiences for individuals and families of all ages and to create public awareness and understanding of the natural world, environmental stewardship, historic and cultural resources, and outdoor recreation skill development.

The Park District strives to make it possible for people with disabilities to use facilities and participate in classes, lessons, camps, and special events. Reasonable accommodations are provided to individuals, groups or families to enable persons with disabilities to have a safe, enjoyable experience.

### General Program Assistance

The Park District's goal is for everyone, including persons with disabilities, to enjoy park facilities, programs and services. General program assistance is available, including: assistive listening systems, sign language interpretation, program aides and volunteers, and publications in braille, larger print, audio tape and/or computer disk. Contact the supervisor at the park you wish to visit to inquire about programs, events and the most accessible areas or facilities.

To request accommodations for specific needs, please contact us at 763-559-6707 (phone); 763-559-6719 (TTY); or [access@threeriversparkdistrict.org](mailto:access@threeriversparkdistrict.org). Advance notice of 14 days is usually sufficient; however, the Park District will try to accommodate requests on shorter notice.

### Adaptive Equipment

The Park District offers some adaptive equipment, which enables greater use of Park District facilities and participation in Park District programs for persons with disabilities. Some equipment is available for use by individuals at their convenience or upon request, and other equipment is available for use as part of a program. Appendix E is a listing of adaptive equipment, its location in the Park District, and information on how to request use of it. Information is also available at: <http://www.threeriversparks.org/about/accessibility/adaptive-equipment.aspx>.

Suggestions for consideration of other equipment may be directed to [access@threeriversparkdistrict.org](mailto:access@threeriversparkdistrict.org).

### Program Inclusion

The Park District strives for inclusion in its programming. Inclusion is providing people with and without disabilities the opportunity to participate in recreation and leisure programs together and providing the necessary individual adaptations, accommodations, and/or supports so that every person can benefit equally from recreation and education experiences.



In 2011-2012, the Park District conducted a program accessibility “inclusion” assessment, which involved the evaluation of a sampling of program areas by Park District program supervisors. An assessment tool (Appendix F) was designed to provide information about how and to what extent programs were being used by persons with disabilities and to provide an analysis of the District’s ability to include people with disabilities in the programs. This program assessment included both group education and public programs. Appendix G is the Program Inclusion Self-Assessment Report.

### **Adaptive Programs**

Adaptive programs and services are specifically designed for the enjoyment, education and skill development of persons with disabilities. The Park District serves as a venue for agencies to offer their own adaptive programs, cooperates with agencies on program offerings and offers some Park District-sponsored programs. The following provides an overview of adaptive programs:

- The Park District’s Outdoor Recreation School offers adaptive public programs: cross-country skiing, kayaking, canoeing, mountain biking, ski club, and demo days where people with disabilities can try out equipment at no cost. The Outdoor Recreation School partners with Courage Kenny Rehabilitation Institute to offer additional adaptive programming that includes archery, fishing, and geocaching. Cooperative programming has also been offered through the Minneapolis Veterans Administration Health Care System.
- Hyland Snow Sports Academy, located at Hyland Ski and Snowboard Area (HSSA) in Bloomington, offers two adaptive programs: STARS, which is a program for skiers with developmental disabilities, and LEADING EDGE, which is for skiers with developmental and physical disabilities. Private skiing and snowboarding lessons are available from trained instructors. HSSA also offers cooperative programs through Courage Kenny Rehabilitation Institute and Special Olympics. Courage Kenny Rehabilitation Institute provides training for HSSA staff and volunteers.
- Eagle Lake Youth Golf Center is home to The First Tee, a program dedicated to providing affordable and accessible golf opportunities for youth. It is a youth development program blending golf skills with invaluable life skills education. The First Tee is for all kids, with priority given to underrepresented populations including girls, youth golfers with disabilities, minorities, and those with financial need. Children ages 8-17 can request a golf scholarship. Eagle Lake Youth Golf Center offers an adaptive golf lesson program in cooperation with Courage Kenny Rehabilitation Institute - <http://www.couragecenter.org/ContentPages/Golf.aspx>. Eagle Lake has an accessible golf cart available upon request.

### **Recommendations**

- Continue to use the program assessment tool as a guide to planning for accessibility and inclusion in program design.
- Continue to engage the public and community agency partners serving persons with disabilities in providing suggestions to improve program services.
- Hire a specialized therapeutic recreation professional staff member to oversee development of agency relationships, provide specialized staff training, coordinate program assessments, coordinate the promotion of programs and services and provide guidance and assistance to staff throughout the District.
- Establish relationships with community partners to encourage use of Park District facilities to provide agency-sponsored accessible recreation programs and services.

- Evaluate current program-related contracts, cooperative agreements, and partnerships to ensure accessibility and offer training and suggestions as needed.
- Continue to work with agencies serving persons with disabilities to determine program areas that may best be offered by the Park District.
- Annually provide general ADA-related staff training opportunities.
- Provide a training session for ski and snowboard instructors at Elm Creek Winter Recreation Area and HSSA.
- Evaluate and add additional adaptive equipment as determined appropriate and stay abreast of changing design for adaptive equipment that would benefit general public services and programs (examples below).
  - o Purchase additional all-terrain wheelchairs for winter use at Nature Centers to replace or supplement pulks.
  - o Provide assistive listening devices at each program center and/or voice amplification systems.
  - o Purchase adaptive archery equipment for the Outdoor Recreation School.
  - o Purchase one or two additional outriggers for kayaks.
- Work with Park District design staff and experts from community agencies to identify and recommend the construction of minor site or physical program accessibility improvements (examples below).
  - o Build a ramp to be used at Gale Woods Farm to allow wheelchair users to access the people mover wagon.
  - o Evaluate the river rafting program offered by Kroening Interpretive Center to assess ways it can be more accessible to people with physical disabilities.

## **Buildings & Outdoor Developed Areas**

The Park District manages more than 26,500 acres of parkland and 120 miles of regional trails. Within these properties, the Park District manages natural resources and provides outdoor developed areas and buildings for public use. "Outdoor developed areas" are defined as areas that can contain elements such as drinking fountains, parking areas, play areas, boating facilities, fishing platforms, and site-related features that are addressed in the Americans with Disabilities Act and Architectural Barriers Act accessibility guidelines. Trails and beach access routes are also found within outdoor developed areas.

Shared-use paths are not included as part of the ADA regulations for outdoor developed areas, but they are designed and managed in accordance with Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way. The term "shared-use path" is defined as a bikeway physically separated from motorized vehicular traffic by an open space or barrier and either within the highway right-of-way or within an independent right-of-way. Within the Park District, shared-use paths may also be referred to as bike/hike trails, multi-use trails, or regional trails. Shared-use paths may also be used by pedestrians, skaters, wheelchair users, Other Power Driven Mobility Devices (OPDMD) users, joggers, and other non-motorized uses.

Over time, the Park District has made accessibility improvements to its buildings and outdoor recreation areas and strives to meet or exceed accessibility standards. New construction is designed in compliance with all existing ADA standards and federally adopted and proposed ADA standards. Additional improvements are needed for existing areas and buildings — which, when completed, will contribute to greater accessibility.

The Park District maintains a strong commitment to implementing projects to improve accessibility. The Park District incorporates accessibility improvements into new projects and strategically prioritizes correction projects for funding within its annual Asset Management Program, which is the Park District's funding mechanism for capital improvements. Projects are funded from the Park District's annual operating budget, general obligation bonds, regional operations funds and private grants and are reflected within either the annual operating budget work program or Asset Management Program.

### **Park Self-Assessments**

The self-assessments of facilities and outdoor developed areas were based upon current ADA laws, the 2010 ADA Standards of Accessible Design, the draft Final Accessibility Guidelines for Outdoor Developed Areas and the Proposed Accessibility Guidelines for Pedestrian Facilities in the Public-Right-of-Way. Staff interviews and on-site field inspections were used to assess current conditions. The intent of these self-assessments was to identify, relative to current usage, existing deficiencies in buildings and outdoor developed areas.

The Park District utilized GIS (geographic information systems) hardware and software to collect, store, analyze and record self-assessment data. This data represents information from features as small as a door to as large as a play area. The self-assessment was organized in a manner that closely follows the 2010 ADA standards categories, with each evaluation category containing numerous individual requirements. Records will be retained in a centralized accessibility database and updated as barriers are removed or new deficiencies occur due to age of facilities or acts of nature.

Appendix H is the compilation of completed individual park self-assessments and includes a base map of each park. A majority of the major-use parks and facilities have been assessed. There are a small number of lesser-used public areas that will be completed during the next re-evaluation cycle, to be scheduled within three to four years. The assessment reports include identification of deficiencies, recommended improvements, priority rankings and cost estimates. Deficiencies range from minor in cost and easy to repair, to significant in cost and complicated to remedy. Deficiencies generally occur in facilities and outdoor developed areas constructed prior to enactment of the Americans with Disabilities Act of 1990.

Within the park self-assessments, the Park District assigned a general program category to all deficiencies that impact the greatest number of users/visitors based on the following criteria:

- Ability to address common barrier removals in a short time period with minimal resources;
- Ability to address barrier removals within an existing planned repair or improvement project; and
- Ability to address major barrier removals by coordinating with other Park District initiatives including: Asset Management projects, Vision Plan initiatives, and park master plan implementation.

The program category establishes both an estimated timeframe and funding mechanism for the barrier removal improvements as follows:

**Common** – is a relatively common barrier and will be addressed based on best practices. These projects are relatively inexpensive barrier removals that will be scheduled for corrective action within one to five years. Funding for these improvements will be requested as an annual allocation for an ADA barrier removal project within the Park District’s Asset Management Program.

The following table is a District-wide cost summary of recommended common improvements for both buildings and outdoor developed areas as reflected in the park self-assessments.

Program Category	Cost Estimate	
<u>Common</u> 1-5 years	Buildings	\$575,000
	Outdoor developed areas	<u>\$360,000</u>
	<b>Total</b>	\$935,000

**Planned** – involves a more extensive repair or improvement relating to a specific barrier. Corrective actions will be coordinated through a scheduled repair, rehabilitation or replacement program. Corrective action is estimated to occur within 1 to 10 years. Funding is provided either through the general annual operating budget or from the annual Asset Management Program.

**Major** – involves the coordinated removal of multiple barriers that impede access to an entire or large portion of a building or outdoor developed area. Barrier removal will be integrated into other comprehensive building or site improvements or may be implemented as a stand-alone project. Costs are generally significant and the corrective action will be considered and planned for within the 10-year Asset Management Program. Funding is requested as part of a major rehabilitation or new capital project through an individual project request within the annual Asset Management Program.

### Alternate Accommodations

In some cases, a means of alternate accommodation may be provided to more readily meet the intent of the 2010 Standards. One example of this scenario would be the need for access to a primary function on an inaccessible level. A potential solution, when an elevator is not available, might be to move the primary function from the inaccessible level to an alternate, but accessible, space. In general, providing a means of alternate accommodations are not included in the determination of deficiencies and assigned treatment methods.

### Maintenance

Regular inspection and maintenance of buildings and park areas are important factors in ensuring that the functionality and planned accessibility of park areas, facilities and buildings is maintained. Title II of the ADA states, “A public entity shall maintain in operable 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.” The Park District has a comprehensive maintenance and rehabilitation program. Building and recreation features are regularly inspected and both short-term and long-term maintenance plans are implemented. Isolated or temporary interruptions in service or restricted access due to maintenance or repair activity are not prohibited; however, the Park District is responsible for the seasonal and structural maintenance of its facilities. Ongoing and appropriate training is necessary to assist Park District staff in recognizing and addressing unexpected barriers and to work with design staff to understand and respond to more significant accessibility concerns.

### **Shared Use Paths**

The Park District manages approximately 300 miles of non-paved and paved shared-use paths within parks and within regional recreation and transportation corridors throughout the Park District's operating area. Design and construction of all shared use paths have utilized the most stringent guidelines available at the time of design. This action has resulted in the majority of shared use paths being compliant with the current proposed guidelines for pedestrian facilities in the public right-of-way. Shared use paths were not included in the self-evaluation due to the ongoing revision to guidelines over the past few years. As these guidelines become final, the Park District intends to conduct the self-evaluation of shared-use paths over the next three to five years.

### **Recommendations**

- Use the results of the self-assessments and stakeholder input to develop and annually update an ADA Management Plan that will prioritize identified remediation projects and include funding recommendations for consideration with the Park District's annual Asset Management Program.
- Develop and maintain a centralized accessibility database to record all known deficiencies and track remediation actions.
- Conduct periodic meetings with the Park District's ADA Committee to review accessibility plans for the design, maintenance and barrier removal of facilities and outdoor developed areas.
- Ensure ADA Committee participation in design review of proposed new outdoor developed area features and buildings.
- Develop and offer training programs for maintenance, carpentry, design, facility operations, and other Park District staff on ADA standards and best practices.
- Continue monitoring proposed standards for shared-use paths to ensure that the Park District considers current accessibility design standards.
- Conduct a re-evaluation of all facilities and outdoor developed areas on a three- or four-year cycle.



## Implementation Program

The Park District will, whenever feasible, remove physical barriers to accessibility within programs, buildings, and outdoor developed areas. The Park District will consider funding levels through its annual operating and capital program budgets to make required improvements that will, at a minimum, bring the various park facilities up to accessibility standards, and as resources permit, create enhanced accessibility opportunities. All new projects address accessibility consistent with the most current ADA standards and guidelines.

Based on the findings of the self-assessments and other 2013 ADA Transition Plan recommendations, the Park District will implement strategies and improvements to enhance accessibility and provide for the enjoyment in the use of the Park District by persons with disabilities.

The ADA Committee will become a standing committee of the Park District. It will periodically convene to work on accessibility improvement ideas and issues and develop an annual work program of strategies aimed at improving and promoting partnerships, communications, program access, and outdoor recreation facility use. The ADA Committee will be chaired by the Director of Facility Services. The ADA Committee will work with staff throughout the Park District by providing training, guidance, and sharing of best practices.

The removal of physical barriers to accessibility will be addressed in an ADA Management Plan. The plan will identify barrier removal needs and desired physical accessibility improvements and include recommendations for prioritization, timelines, and funding. The plan will be updated annually and project priorities will be recommended for funding consideration as part of the Park District's annual Asset Management Plan. The Senior Managers of Architecture and Landscape Architecture are charged with the development and maintenance of the ADA Management Plan.

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