



FINAL REPORT TO THE Geneseo Park District

Conclusions and Recommendations

September 7, 2011

**One Source.
Infinite Solutions.**

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All Site Conclusions and Recommendations

Background

A step-by-step approach will help the Geneseo Park District address the deficits in the specific site reports. We recommend the following to accomplish the goal of making District programs in District facilities more accessible to people with disabilities.

A Guide to this Section

There are 711 access deficits identified in the 5 site reports. That is the ADA requirement, the identification of every access deficit at every site and facility. And, for every deficit, a solution must be identified.

However, this section is all about the big picture. As discussed in the cover letter with this report, the District does ***not necessarily have to make every site accessible.*** It ***does*** have to make every program it conducts within its sites accessible.

We have attempted to identify some broad solutions, such as the refreshing of all accessible parking, as a way to address issues identified in the earlier 5 site reports, and as a way for the District to better manage compliance. This approach also gives the District flexibility within its compliance efforts to move resources so that they are applied with optimal impact.

This is also about accountability. The adjustments to door closers, eliminating changes in level, and other recommended actions are ineffective if not maintained over time by District employees. We recommend the following to facilitate review:

First, read the final report cover letter to Molly Hamer. It describes the concepts and requirements invoked throughout the report.

Second, read this Conclusion section. As mentioned above, this is a big picture review of the issues and solutions we recommend.

Third, read the 5 site reports. Use your computer and you'll have instant access to the report for that site, the photo gallery, and the checklists.

Fourth, use your knowledge of the sites and of your staffs' expertise. You know Geneseo Park District sites better than we do, and you certainly know the staff better than we do. Blend in what you know with what we recommend in the report. There is always another way to solve an access problem...perhaps you'll be the one to see that solution.

Common Issues

In our evaluation, some common issues arose. These included the way maintenance affects parking lots and building hallways. The common issues are also "big picture" items for the District and incorporate many of the specific site recommendations. ***It is also important to note that while we have discussed a phased approach to barrier removal, the District should make the corrections it will make as soon as is possible.***

Maintenance

The District uses a conscientious staff to maintain its facilities and sites. However, over time, every facility and site yields to wear and tear. The recommendations below describe ways in which attention to maintenance can specifically address some access deficits.

1. **Provide training** to maintenance staffs regarding the features of an accessible route and how to ensure that it remains unobstructed and that park amenities (such as garbage cans or signs) are placed adjacent to the accessible route.
2. **Provide training** to recreation staffs regarding the features of an accessible route and how to ensure that it remains unobstructed.
3. **Purchase some new tools.** The District should have enough battery-powered digital levels, and tools to measure pounds of force for doors, to equip some staff for occasional spot-checks. A great website for gauges is:

<http://www.technologylk.com/crl-door-pressure-gauge-lk-HMC035.htm?src=froogle>.

Changes in Level and Gaps

The routes and sidewalks that make up the District's network of accessible routes are in fair condition. Wear and tear, settling, weather, and other factors combine to cause changes in level and gaps along portions of those accessible routes, making that portion noncompliant and a barrier to many customers with physical and sensory disabilities.

Removing changes in level and gaps has a significant universal design benefit too, as more people with all types of conditions can more easily use District routes...staff pushing carts of supplies, parents with kids in strollers, and people using an assistive device such as a wheelchair, Segway, or walker.

4. **Eliminate changes in level** in 2012 or 2013. Using the rationale that the most severe changes in level are the greatest barriers to access, make changes in level of greater than .75" the highest priority. Make changes in level of between .5" and .75" the second priority. Make beveling of changes in level of .25" to .5" the third priority.
5. **Add** change in level of more than .25", and gap checks of greater than .5", **to park maintenance safety checklists** in 2011 if not sooner. This will help identify and correct these problems before they expand. Make pre-measured shims and distribute to employees for their use and ease of measurement.
6. **Add inspections for gaps** of greater than .5" **to park maintenance safety checklists**. Identify and fill these gaps before they expand. **In the alternative, consider a resurfacing of segments of asphalt route** which have deteriorated.
7. **Adopt** a policy about the use of other Other Power Driven Mobility Devices in District facilities and at District sites, and promote that policy to the general public. Every day, more people with limited physical mobility start to use a Segway or similar machines.

Pursuant to the new ADA title II regulation published September 14, 2010; this policy was to have been in place by March 15, 2011.

These assistive devices provide great benefits to people with disabilities and the sooner the District has a policy in regard to their use the better. The policy could, at a minimum, address times of allowed use (dawn to dusk), speed limits, off-limits areas, status of the user as a person with a disability, and minimum age. It is important to note that a power driven mobility device is not a wheelchair. That device has a separate definition and is already allowed in facilities and parks.

The components of a policy are noted below. ***The District is welcome to use some, all, or none of this, but a policy must be in place. We recommend at least the following statements:***

Definition: *Other power-driven mobility device (OPDMD) means any mobility device powered by batteries, fuel, or other engines—whether or not designed primarily for use by individuals with mobility disabilities—that is used by individuals with mobility disabilities for the purpose of locomotion, including golf cars, electronic personal assistance mobility devices (EPAMDs), such as the Segway® PT, or any mobility device designed to operate in areas without defined pedestrian routes, but that is not a wheelchair within the meaning of this policy.*

Definition: An electronic personal assistive mobility device (EPAMD) is a device used by a person with a mobility impairment for ambulation. This definition does **not** include gasoline powered devices, golf cars, or riding lawn mowers,

Permission: The Geneseo Park District authorizes persons with mobility impairments to use EPAMDs in District facilities and sites subject to the following restrictions:

1. The operator of the device must be a person with a mobility impairment, and upon request by District officials, shall produce proof of such within 24 hours;
2. The device, if used in a facility or in a park, is allowed in any area of the facility or park in which the general public is allowed, with the exception of employee only spaces, stairways, and identified hazardous areas;
3. The device, if used in a facility, must be controlled by the operator. It:
 - A. may not exceed 4 mph;
 - B. shall be driven on the right side of the circulation route;
 - C. is prohibited from carrying another person on the frame, or any object on the frame that may make the device less stable; and
 - D. must not be operated in a dangerous or reckless manner that jeopardizes the safety of the operator, District employees, or District participants.

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4. The device, if used in a park or outside, must be controlled by the operator. It:
 - A. may not be operated between dusk and dawn unless equipped with headlights that are visible at 300'
 - B. may not exceed 6 mph;
 - C. shall not be driven into wet or ecologically sensitive areas which are posted as such;
 - D. shall be driven on the right side of the circulation route;
 - E. is prohibited from carrying another person on the frame, or any object on the frame that may make the device less stable;
 - F. must not be operated in a dangerous or reckless manner that jeopardizes operator safety, District employees, or District participants.
5. The District accepts no responsibility for storage of the device.
6. The District accepts no liability for damage to the device, or injury to the operator, whether caused by the operator, another visitor to a District facility or site, or any other circumstance.
7. The District accepts no liability for damage caused by the operator of the device, or injury to others caused by the operator of the device.
8. The District reserves the right to suspend the use of facilities or sites by the operator if doing so is in the best interests of the District and its participants.
9. The District reserves the right to change, modify, or amend this policy at any time, as it would any other policy.

Obstructed Accessible Routes

Employees **may** see an accessible route as an empty 36" wide space in which a potted plant or garbage can is a perfect fit. However, that blocks or obstructs the accessible route

8. ***Provide training to park maintenance, recreation, and administration staffs*** regarding maintenance of accessible routes in parks and in recreation facilities.

Employee Work Areas

The District employs well-qualified and skilled people on a full time basis, making parks and recreation services available to Geneseo Park District residents. It also employs many more on a part-time or seasonal basis.

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The District likely already has employees with disabilities and in the future, will have **more** employees with disabilities, in all categories...full time, seasonal, and regular part time.

It is important to address access to work areas, and both the title II regulation and the work of the Access Board do so. In section 203.9 of the 2004 consolidated accessibility guidelines, the treatment of employee areas is made clear.

Generally, a person with a disability should be able to **approach, enter, and exit** the work area. This is addressed by requirements for accessible routes and accessible means of egress.

Other factors are door width, threshold changes in level, levers and not knobs, and the height of door mechanisms.

Excluded from this exception are several types of common spaces in employee areas. Spaces such as the ones below must meet the access guidelines as they are excluded from the definition of employee-only areas:

- corridors
- toilet rooms
- kitchenettes for employee dining use, and
- break rooms

In short, the key issues are the accessible route, changes in level, doors and entries, and maneuvering space once within the work area. This approach is effective so long as when the District hires an employee with disabilities, or a current employee acquires a disability, it will remove architectural barriers in work areas or make other accommodations.

The two recommendations below are particularly important in some of the employee only sites owned by the District such as the Geneseo Community Center.

9. **Address accessibility in the District personnel policies**, and note that, upon request by an employee, the District will make reasonable accommodations, which **may** include the removal of architectural barriers in work spaces.
10. **Require new construction, and alterations or additions** that include employee work areas to be designed and constructed so they are compliant with the 2010 Standards for Accessible Design and the Illinois Accessibility Code.

Accessible Parking

The District maintains approximately 156 standard parking spaces at facilities, and 12 more that are designated as accessible stalls. Illinois requirements here are more stringent than federal requirements.

In correcting or refreshing its accessible stalls, the District should address all of them at once to eliminate inconsistencies and come into compliance.

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11. **Create a parking stall template.** A suggested template is below.

Parking Stall Dimensions

Stalls are a minimum of 8' wide. An adjacent access aisle must also be a minimum of 8' wide. An acceptable **alternative** design is an 11' stall with an adjacent 5' access aisle. The access aisle must be diagonally striped with high quality yellow paint.

Signs must be mounted on posts not farther than 5' from the head of the stall. The collection of signs must include the US Department of Transportation R7-8 standard sign (the blue icon in a wheelchair). Below that must be the fine sign. The statewide fine is \$250. Unless the City of Geneseo has adopted a higher fine by ordinance, the sign must note the \$250 fine.

Federal settlement agreements in Illinois require a third sign, on at least one stall, that says VAN ACCESSIBLE. The Illinois Accessibility Code does not include this requirement but we believe it is required.

This belief was reinforced recently by a US Department of Justice settlement with St. Clair County in Illinois. The settlement required the addition of "van accessible" signs.

Finally, the bottom edge of the lowest sign is a minimum of 48" above the finished grade. We recommend 60" so it cannot be obstructed by a parked auto.

We suggest that the signpost be located at the head of the accessible stall and that the curb cut and detectable warning run the distance of the access aisle.

Perhaps the most common error we see in accessible parking stalls and access aisles is the slope. The Illinois Accessibility Code limits the slope to **not more than 2% in any direction**.

This is a challenging requirement that can take considerable effort to meet.

Connection to the Accessible Route

The access aisles should connect to an accessible route. The maximum running slope for the accessible route is 5%, and to account for heaving and settling, we recommend 4%.

The maximum cross slope is 2%. Do be certain to use compliant detectable warnings, now available in a template with a colored background and raised, truncated domes.

Passenger Loading Zone

The loading zone must have an access aisle adjacent and parallel to vehicle pull-up space. The loading zone access aisle must be a minimum of 60" wide and 20' long.

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Confirm this template with the City of Geneseo, and the Illinois Attorney General's Office, to ensure that stalls will be compliant.

12. In 2012, 2013, or 2014 **implement a plan to correct or refresh every accessible stall** at every District facility. Incorporate this task into other plans that require parking lot restriping or resurfacing. Certainly in 2011 as lots are resurfaced or restriped, use this template as well.

Running Slope and Cross Slope

We often saw running slopes steeper than permitted. At some sites this was a minimal issue, but at other sites it was a significant variance. This condition naturally occurs when concrete settles, or when connections between new and old routes are off by fractions of an inch. Cross slope is equally important, as it serves drainage as well as access purposes.

13. **Adopt a policy** that in new construction and alterations the ramp slope shall not exceed 1:13, or 7.7%, as opposed to 1:12, or 8.33%. This allows room for error in the field. It also makes ramps easier to use for everyone, not just people with disabilities. This universal design approach is also a risk management tool.
14. **Adopt a policy** that in new construction or alterations the cross slope shall be an integral part of the project and shall not exceed 2% or 1:50.

Detectable Warnings

The US Access Board suspended the detectable warning requirement in the late 90's, for a period of several years. It was restored in 2002 though, and is now included in the 2010 Standards. It is typical to see noncompliant detectable warnings in every community.

The detectable warnings at curbs **that are not compliant** are often a cross-cut of concrete, or a grid laid on wet concrete to create a diamond-shaped indentation. Over time these should be replaced.

15. As with parking, **develop a template for detectable warnings**. Confirm the template with the City of Geneseo and the Illinois Attorney General's Office.
16. In the same year that parking is refreshed, **implement a plan to correct or refresh every detectable warning** at every curb or crossing at District facilities. If necessary, phase this out over a two or three year period.

Door Opening Force Requirements

In District buildings and facilities, there are approximately 163 doors. Many have closer mechanisms. Some of these need adjustment to bring the pounds of force (lbf) necessary into compliance (5 lbf for interior doors and 8.5 lbf for exterior doors). However some of the closers are just old. The wear and tear of 20 or more years erodes the closer effectiveness.

17. **Evaluate and determine the age of door closers.**

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18. **Add door closer maintenance checks** to safety checklists for employees and for closers with 10 years of service or less, aggressively maintain them for effectiveness.
19. **Purchase and install new door closers** for all exterior doors (with closers 20 years old or more) and 50% of interior doors in 2012 or as soon as is possible.
20. **Purchase and install** new door closers for all remaining interior doors (with closers 20 years old or more) in 2013 or as soon as is possible.

Signage

District signs serve several valuable purposes. First, signs assist wayfinding in buildings, such as the Community Center. Second, signs identify important permanent elements of facilities, such as restrooms. Third, signs facilitate access by people with vision and physical limitations. Aside from consistent use of the District logo, we did not note a signage template.

The Access Board requires different treatment for 2 types of signs. Signs for permanent spaces, such as a bathroom, must be in both Grade 2 Braille and raised lettering. For directional or informational signage though, only raised lettering is required. Be certain to incorporate these approaches into signs in buildings and sites operated by the District.

21. **Develop a sign template** in 2011 that describes where and in what facilities signs will be used. The template could include size of sign, mounting height, mounting location, size of characters, space between characters, contrast between characters and background, icons or symbols used in the signs, District information in the signs (name of facility? phone number? main office number?), and more.
22. **Implement signage template and correct or refresh** District facility and site signage in 2012 or 2013.

Bathrooms

Bathrooms are an essential part of a visit to a Geneseo Park District facility. Exercise, food and beverage, social activities, and more all rely on one of the oldest designs known to us. Making those facilities accessible is tremendously important.

Additionally, **portable toilets** placed temporarily at sports fields and event venues **must** be accessible and **must be served by an accessible route**.

23. **Develop a bathroom template in 2011.** Confirm it with the City of Geneseo and the Illinois Attorney General. Be sure to include temporary facilities such as portable toilets in the template. The template should address the toilet itself, grab bars, items in the stall such as toilet paper and hooks, the stall itself, operating mechanisms, mirrors, sinks, hand towels, hand dryers, and more.
24. **Include bathroom renovations** at facilities in the District's Capital Acquisition and Replacement Plan.

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25. **Consider the use of automatic flush controls.** These have environmental benefits and are also a great way to eliminate some accessibility problems.
26. **In the interim, implement non-structural modifications recommended in each section of this report,** such as lowering mirrors, remounting grab bars, changing the height of toilets and urinals, installing compliant stall hardware, and so forth.

These less costly changes on a site-by-site basis will serve your customers well until resources are available to renovate restrooms on a comprehensive scale.

27. **Make one portable toilet,** if one is provided at a site, accessible. This includes a portable toilet placed at a picnic shelter or adjacent to sports fields. These must be accessible and must be served by **an accessible route. Follow our single-user toilet specifications in our site checklists.**

Lockers and Locker Rooms

Research shows that people with disabilities will refrain from using public facilities if they fear that sites are not accessible or they'll be embarrassed in their attempt to use sites. We all know the benefits of recreation participation. If a person with a physical disability comes to the Outdoor Pool to swim, or the community center to work out, there are no designated accessible lockers.

28. **Implement the locker room changes recommended** at the Outdoor pool and at the community center.
29. **Promote availability of accessible locker rooms once completed.** Announce these changes to the community and see more participation by people with disabilities.

Alarms

In existing facilities where an aural or audible fire alarm system is provided, a visual alarm is not required unless the building was constructed after January 26, 1992 or has been upgraded since that same date.

If an alarm in an existing facility is audible only, it need not be modified to include a visual alarm unless it is replaced or upgraded in the future.

30. **Determine in 2011** if systems have been upgraded or replaced since 1992.
31. **Develop a plan in 2011** for the installation of aural and visual alarms in renovations.
32. **Retrofit construction that has occurred since 1992** to include aural and visual alarms by the end of 2014.

Brochures

The park grid in the District brochures is an important tool for Park District residents and can now be used to communicate about accessibility. Revise it to incorporate the access work District staff completes and indicate in your grid where, for example, the accessible picnic areas are, or where the accessible playgrounds are.

33. ***Update parks and facilities grid*** to reflect decisions made by the District regarding our recommendations, and note which sites are accessible or will be made accessible.

Website

The title II regulation requires that all types of public communication used by the District be available to people with disabilities. Many people with vision impairments use websites every day with the aid of technical equipment. The District is required to evaluate its website and make necessary changes so that the website can be read by that type of equipment.

A link at the US Department of Justice website offers guidance on this. The District IT staff should become familiar with this issue. Go to <http://www.ada.gov/websites2.htm>

34. ***Evaluate the District website*** and make changes so that the information on the site is accessible to people with disabilities.

Swimming

The ***minimum required*** of the District by title II of the ADA is that the “program” of swimming be accessible to residents. This is measured by the “program access test” described in section 35.150 of the title II regulation (see 28 CFR Part 35). The District has one outdoor pool, so it must be made accessible.

35. ***Make corrections to Outdoor Pool*** by implementing all of the recommendations in that site report.

Transition Plan Recommendations

In our work we addressed all sites and facilities, as well as employee work areas. Title II requires that employee work areas must allow a person with a disability to “approach, enter, and exit” the work area.

As a clarifying note, employee break rooms, restrooms, halls, and common areas are ***not*** considered an employee work area and must meet all other access requirements. We also recommend here that District personnel policies comply with the title I provisions of the ADA.

We made recommendations for corrective work to occur in three phases, with a fourth category for discretionary action by the District. Our report includes a summary by task, with costs, as well as a detailed description of work by site and by year. ***We project total costs of \$263,506.25*** exclusive of staff costs, project management expense, and contingencies.

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It was difficult to balance the cost of work so that an equivalent amount is recommended each phase. Instead, we recommend you start with significant work in phase one, increase the work in phase two, and reduce the work in phase three.

- In phase one, we propose tasks with an estimated cost of \$65,603.75
- In phase two, we propose tasks with an estimated cost of \$118,693.75
- In phase three, we propose tasks with an estimated cost of \$79,208.75

A separate Excel spreadsheet is included for each phase, and a summary spreadsheet includes all phases as well as work we classified as DISTRICT OPTION. This latter category includes work which could be accomplished at the option of the District, but that we believe is not necessary to meet the Department of Justice program access test.

Public Feedback

An integral part of the access audit of sites and facilities, and the development of a transition plan, is the involvement of the public. A public forum should be scheduled after the District has had some time to digest this report. We would be glad to work with the District on this project at no charge, and to return to assist in this process.

Conclusion

The District has a variety of recreation facilities and sites. The skilled staff operates facilities and sites the community wants and enjoys. This report identifies some issues that are typical of **every** recreation infrastructure.

The District has already taken steps towards accessibility and that undoubtedly helped.

The Board of Commissioners should review this report and determine to what extent it will act on our recommendations and the recommendations to be received from staff. It is important that access work occur every year during the transition plan.

The District should make the corrective work occur as soon as is possible.

While no one can say with certainty how long the District should feel comfortable in stretching these projects, we'd suggest it be not more than a 3 year range after the effective date of the 2010 Standards...that means March 15, 2015. ***The District must understand that it could be forced to accelerate its pace.***

Your strategy should definitely address the common issues identified in this report.

The District should be commended for undertaking this task. Although this access audit and the subsequent transition plan are both mandated tasks, many of your neighbors have not completed these steps.

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In closing, thanks again to the staff at the Geneseo Park District for their cooperation and spirit. All of the team at our firm enjoyed working with them. We acknowledged Molly Hamer and her staff for their efforts earlier, and we do so again here.

Call me at Recreation Accessibility Consultants at 224/293-6451 if there are any questions. Thanks again for inviting us to work with the District.

Submitted by

**John N. McGovern, J.D., President
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GPDCONCLUSIONS