



Geneseo Park District

Transition Plan Executive Summary

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Geneseo Park District Executive Summary

The Geneseo Park District comes under Title II of the Americans with Disabilities Act (ADA) for State and Local Governments. The Geneseo Park District has the responsibility to provide equal and integrated access to its services, facilities, programs and activities for its residents and visitors with disabilities. To provide access, the Geneseo Park District must make reasonable modifications to policies and procedures as well as physical changes to the built environment.

In addition to the physical assessment, the development of policies and procedures for Service Animals, Other Power Driven Mobility Devices (OPDMD), and Effective Communication recommendations and examples have been provided. Additional details and information has been provided to the Geneseo Park District.

The following comments are a summary of the Geneseo Park District accessibility evaluation and Transition Plan development for the parks, Athletic Field, Aquatic Center, Community Center and Theater. Each public facility used for programs was reviewed for their compliance with the 2010 Americans with Disabilities Act Accessibility Guidelines (ADAAG), the Illinois Accessibility Code (IAC) and the ADA's proposed Outdoor Developed Area Guidelines. In addition, all elements were evaluated using Equivalent Facilitation standards (ADAAG 103) and Dimensional Tolerances (ADAAG 104.1.1).

In addition, a review of the District's policies and procedures was conducted. The Geneseo Park District has a formal Inclusion Policy in the Administrative Policy Manual. Comments for this review and the accessibility issues noted are by using the standards developed for the Americans with Disabilities Act (ADA), findings from the Department of Justice and review of previous client's policy and procedures. The Transition Plan and policy and procedure review are working documents that should be continually reviewed and updated as changes are made.

Under Title II of the ADA, the regulations prohibit public entities such as the Geneseo Park District from discriminating against or excluding a person from programs, services, or activities based on disability. Geneseo Park District is responsible to meet the obligations of Title II of the ADA and assign a person as the ADA Coordinator. The ADA Coordinator is responsible to receive, review, and respond to questions and concerns expressed by a person with a disability related to access of the parks and programs. In addition, this person would be responsible to implement removal of access barriers recognized in the Transition Plan.

It should be noted that in existing facilities you are permitted to reassign a program from an inaccessible location to an accessible location (28 C.F.R. §35.150(a)(1);(b)(1)). Any facility built during the time the ADA was enforced is obligated to follow new construction standards and should be accessible. Also, the ADA requires that at a minimum one

accessible route be provided (ADAAG 206.2). However, each park, preserve, building, trail and facility has been reviewed for their accessibility including multiple entrances, features, elements, facilities etc. This is so that as the various areas are updated and changes are made, the access issues that exist can be corrected at that time.

Priority Parks and Facilities for Barrier Removal

The Geneseo Park District maintains 1 park, Athletic Field, Aquatic Center, Community Center, Theater and farm property. A variety of activities are available for residents and guests. Activities and facilities can vary from a recreation center, meeting rooms, music, special events, pool, fitness center, natural areas, trips, etc. There are activities for a variety of ages and interests.

Anderson Memorial Park has issues related to abrupt transition, protruding structure and branches and not providing the clear floor space at the drinking fountain. The Edwards Park is undeveloped at this time but would require meeting all the accessibility requirements of the ADA and IAC, whenever is more stringent.

Most restrooms have various accessibility violations such as sink knee space, stall doors self-closing, grab bars heights, toilet locations, toilet paper locations and coat hook heights. The sinks designs and some issues in the stalls could prevent some individuals from easily using these facilities. In addition, showers had issues related to spacing from the shower seat to the outside edge of the wall, a curbing to enter the shower area or not providing a properly designed accessible locker.

Other indoor facilities accessibility issues related lack of accessible lockers and changing benches, drinking fountains not providing a Hi-Lo system, to door force and door closing speeds. These issues should become part of a regular maintenance schedule. Other interior issues related to kitchen areas not providing work surfaces, serving counters too high or in some cases not providing accessible sinks.

The parks and facilities listed below are recommended to have a higher priority for removal of accessibility barriers. These parks and facilities are recommended because of their unique features, facilities, programs, and locations throughout the city. The intent of these recommendations is to assist the Park District in removing accessibility barriers that would have the highest impact for the most number of people. These can be reviewed internally to see if they meet the administrations and staff priority sites as well. They include:

Community Center Aquatic Center Theater Athletic Field

Some additional areas that can be considered by the Geneseo Park District include:

- The one park and farm property do not provide any type of parking except off street parking. Consider working with the city to design off street parking that is accessible. The Access Board has developed standards that have not been approved called Public Rights of Way (PROWAG). This could provide some guidance of developing some accessible parking that could allow more people with disabilities to use the sites.
- Placing a value on the Principles of Universal Design or Human Center Design in parks, facilities, and playgrounds. These Principles provide a higher level of accessibility and allow for more people that are affected by disabilities to participate in programs and activities offered by the park district.

Planning Categories for Accessibility Barrier Removal

The following three categories are intended as a helpful tool for the removal of accessibility barriers. The categories include ongoing maintenance, Transition Plan implementation and capital projects. The issues and elements noted under each category are not intended as a definitive list but are a means to assist in the planning for and removal of accessibility barriers in a cohesive and cost effective manner. All items and elements are subject to a shorter replacement schedule if a request or complaint is made by a person with a disability to increase access to programs, services and activities that are offered.

Annual Maintenance or Review of Accessibility Issues

The following list is intended as items that are accessibility issues that are likely to occur each year. These accessibility issues could be removed and adjusted only once a year. In some cases, (such as playground surfaces, door force and timing, debris, etc.) consideration should be made to provide adjustments or removal more than once a year.

- Accessible route - removing debris or elements that have been placed in the accessible route and checking general surface conditions for replacement or re-coating including walkways, parking lots, curb ramps, gutters, etc.
- Branches protruding into walkways and sidewalks.
- Clear floor space and accessible routes – Make sure loose furniture or other loose items (trash cans, ash cans, etc.) do not interfere with accessible routes and clear floor spaces at sinks, toilets, door maneuvering spaces, bench and bleacher clear floor space.
- Door opening force or timing for closing (both exterior and interior doors).
- Exercise equipment's clear floor space.
- Parking spaces needing repainting especially the access aisles.
- Reach range of elements that may have been moved or remounted (brochure racks, soap dispensers, paper towel dispensers, comment boxes, dog disposal bags, etc.).
- Operable parts and replacements if broken (i.e. door and faucet hardware, switches, push buttons, door bells, play equipment handles, etc.)
- Playground engineered wood fiber maintenance.

Removal of Accessibility Barriers or Required Upgrades

The following list of elements could be items that are accessibility barriers noted in the Transition Plan. These are items that do not typically fall into annual maintenance or are a costly item that requires extensive planning or financial support to make the changes.

- Accessible routes that require modifications or replacement such as broken or uneven surfaces, filling gaps, grinding down abrupt transition, modifying slopes, etc.
- Assistive listening devices at assembly or meeting areas/rooms.
- Benches – In locker rooms, dressing rooms, outdoor benches, etc.
- Clear floor space at benches, bleachers, drinking fountains, sinks, telephones, etc.
- Clear swing hinges for widening door clear openings.
- Counter heights.
- Curb ramps and gutters.
- Detectable warnings.
- Door hardware replacement – lever hardware, loop hardware, etc.
- Door and shower thresholds.
- Drinking fountain adjustment or replacement.
- Edge protection at ramps.
- Grab bars – height adjustment, locations, replace with proper sized grab bars, etc.
- Handrails – installation, extensions, replacement, gripping surface, spacing, etc.
- Lockers – lower or raise shelf, lower or raise coat hooks, accessible door hardware, etc.
- Parking spaces – sign locations and heights, parking slopes, proper size of spaces, built-up curb ramps in access aisles, etc.
- Picnic tables of accessible designs, locations, percentages, etc.
- Playground – access to surface, access to elevated elements (transfer platform and/or ramps), ground level play equipment numbers.
- Pool – Lifts, zero depth or sloped entries, transfer systems and/or pool stairs.
- Protruding objects or elements.
- Reach range adjustments for various elements.
- Shower – seat, and grab bars installed.
- Signage – installed or remounting.
- Sink – accessible design/faucets, mounting heights, protective pipe wrap or cover, mounting locations.
- Stairs – tread nosing adjustments, closing open risers, stair surface, etc.
- Toilet – heights, locations, lever location, etc.
- Toilet paper – heights and locations.
- Toilet stall door – locations, hardware, self-closing, etc.
- Trail – slopes, surfacing, conditions, signage, etc. (Considered best practices at this point).
- Urinal – heights, clear floor space, flush control reach ranges, etc.

Capital Planning or Renovation Projects

In some cases, projects may require extensive planning or significant capital to remove the accessibility issues. Some parts of elements or accessibility barriers in these areas may be removed or adjusted to increase access until the time of the major renovation. Other issues may require moving of walls, plumbing, openings, etc. to provide the access.

- Bleacher replacements
- Automatic door openers

- Door clear maneuvering or clear openings
- Elevator
- Ramp upgrades/replacement/installation
- Shower – upgrades or redesign.
- Stair upgrades/replacement
- Toilet rooms/stalls reconfiguration for spacing

Policies and Procedures Review for Geneseo Park District

The review of policies and procedures is being conducted in accordance with the Americans with Disabilities Act (ADA). The ADA requires all public entities to review their policies and procedures to determine if any discriminate against a person with a disability participating in their programming. Integration and inclusion of people with disabilities within a program is a fundamental principle of the ADA (28 C.F.R. §35.130(a)).

A public entity's programs, services and activities cannot be offered if it is not equal to or not as effective as what is provided to others. In addition, no eligibility criteria for participation in a program cannot be used to screen out people with disabilities either directly or indirectly unless the criteria is necessary for the program's activity. The intent is to provide equal access to all programs offered by the Geneseo Park District (28 C.F.R. §35.130(b)(1)(i)-(iv),(vii)).

The Geneseo Park District's programs, services and activities can make reasonable modifications to policies and procedures to avoid discrimination to a person with a disability. A modification is not required if it would fundamentally change the nature of the program or activity. In addition, it would not be required to be changed if it would cause a direct threat to that person or other participants. (28 C.F.R. §35.104, 28 C.F.R. §35.130(b)(7), 28 C.F.R. §35.150(a)(3)) and 28 C.F.R. §36.208).

No surcharges can be charged by the public entity to cover the cost of effective communication, program modifications or access features and they may not impose any additional requirements or burdens on people with disabilities that they do not require of all participants in the program (28 C.F.R. §35.130(f)).

All programs must be offered in as integrated a setting as possible. Separate programs and activities are permitted only when this design ensures equal opportunity for a person with a disability. When a separate program is offered, qualified individuals with a disability cannot be excluded from participating in regular programs if they choose to do so (28 C.F.R. §35.130(b)(2);(d)).

When the public entity contracts with another organization to provide programs and services to the entity's constituents, the public entity must ensure that, the contractor provides services and activities in a nondiscriminatory manner that are consistent with the requirements of Title II of the ADA (28 C.F.R. §35.151(Preamble)).

In relationship to contractors, the public entity cannot discriminate against a company that employs a person with a disability. The acceptance or non-acceptance of a

company must be determined by their qualifications only (28 C.F.R. §35130(b)(5)).

The Geneseo Park District has assigned an ADA Coordinator. This person is responsible to continue the barrier removal process by determining an approximate date for removal and recording when changes have been made. In addition, they are available to answer questions or concerns by the public related to accessibility issues. Their contact information is provided on the website and current Activity Guide.