



# Americans with Disabilities Act Transition Plan Update June 2007



*The vision.....*

*Universal accessibility integrated throughout the Vancouver – Clark Parks and Recreation Department parks, trails and recreational opportunities.*

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## Introduction

On January 26, 1992, the Americans with Disabilities Act (ADA) became a federal law. This comprehensive civil rights law protects individuals with disabilities in the areas of employment, public accommodations, state and local government services and telecommunications. A primary goal of the ADA law is the equal participation of individuals with disabilities in the mainstream of American society.

### *Background*

Title II of the Americans with Disabilities Act covers programs, activities, services, and facilities of public entities such as the Vancouver – Clark Parks and Recreation Department. Under Title II, a public entity may not deny the benefits of its programs, activities or services to individuals with disabilities because of inaccessibility. Both the City of Vancouver and Clark County currently have ADA transition plans that describe the intent of how those agencies will bring all of their properties and facilities into compliance with the ADA guidelines. *The Vancouver – Clark Parks and Recreation Department Transition Plan* will provide updated and current information. Park properties, facilities, programs, activities, and services have been reviewed for accessibility and a plan developed to improve facilities identified as non-accessible.

The Vancouver – Clark Parks and Recreation Department (VCPRD) is not required to take any action to meet compliance, if it can be demonstrated, that a fundamental alteration in the nature of a program or activity would result, would create a hazardous condition, or would represent an undue financial and administrative burden to the department. The determination that undue burdens would result must be based on the evaluation of all resources available for use by the department. For example, if a barrier removal action is judged unduly burdensome, the department must consider other options for providing access to the benefits of the program or park by individuals with disabilities thereby honoring the spirit and intent of the Americans with Disabilities Act.

### *ADA Transition Plan Development Requirements*

Within the ADA, specific requirements for the preparation of an acceptable Transition Plan are set. VCPRD intends to provide these minimum guidelines in its plan update, including:

- Identification of the physical barriers to access programs, activities, services, and facilities;
- An outline of the methods to be used to remove the barriers and make the programs, activities, services, and facilities accessible;

- A schedule for taking the steps necessary to achieve compliance with ADA, Title II; and
- The name of the individual responsible for the plan's implementation.

Within the VCPRD, there are two main divisions that will address and monitor progress of this plan's implementation. The Design and Development division, within the Parks side, will work with other city and county departments to address design issues and upgrades in the parks. They will prepare the documents necessary to implement the upgrades (i.e. construction documents, permits, bid documents, etc.). Some of the upgrades are minor and will not require full bid documents for completion and will be coordinated with the maintenance/facilities departments for completion of the required upgrades. The majority of this document will refer to the parks facilities and meeting compliance with ADA.

The Recreation division of the VCPRD has been actively coordinating the implementation of ADA guidelines through the *Access to Recreation* program. Recreational activities provide the opportunity for people of all abilities and backgrounds to meet and share time with each other in ways that encourage friendship to take root and flourish. The *Access to Recreation* program, as well as the other Parks and Recreation Department activities and programs, enable people to establish ongoing friendships through discovering common interests. The program is permanently staffed with individuals whose main duties are to provide the services necessary for individuals with any accessibility issue to participate in our programs. Accommodation services could vary from mobility, mental, emotional, visual or hearing challenges. The program has provided marketing of the services and has seen tremendous growth in the last 3 years with over \_\_\_\_\_ requests for services in 2006 (up \_\_\_\_\_ percent from the previous year).

### ***Relationship to Other Plans***

The VCPRD Transition Plan update is a subset of the City of Vancouver ADA Transition Plan and the Clark County ADA Transition Plan. Those plans are administered by the respective City/County ADA coordinators. The relationship of the VCPRD requires partnerships with several other city and county departments and the development and maintenance of our facilities. These partnerships include:

- City of Vancouver Grounds and Maintenance (maintain the parks)
- City of Vancouver Facilities Maintenance (maintains structures within the parks (i.e. restrooms, shelter buildings, etc.)
- City of Vancouver Public Works – Signage Department (i.e. all ADA signs, pavement markings, etc.)

- City of Vancouver Transportation Department (i.e. connections to park properties, either with roads or pedestrian walkways)
- Clark County Public Works – Parks Maintenance (maintain the parks)
- Clark County Public Works – Engineering Design and Transportation (i.e. connections to park properties, either with roads or pedestrian walkways).

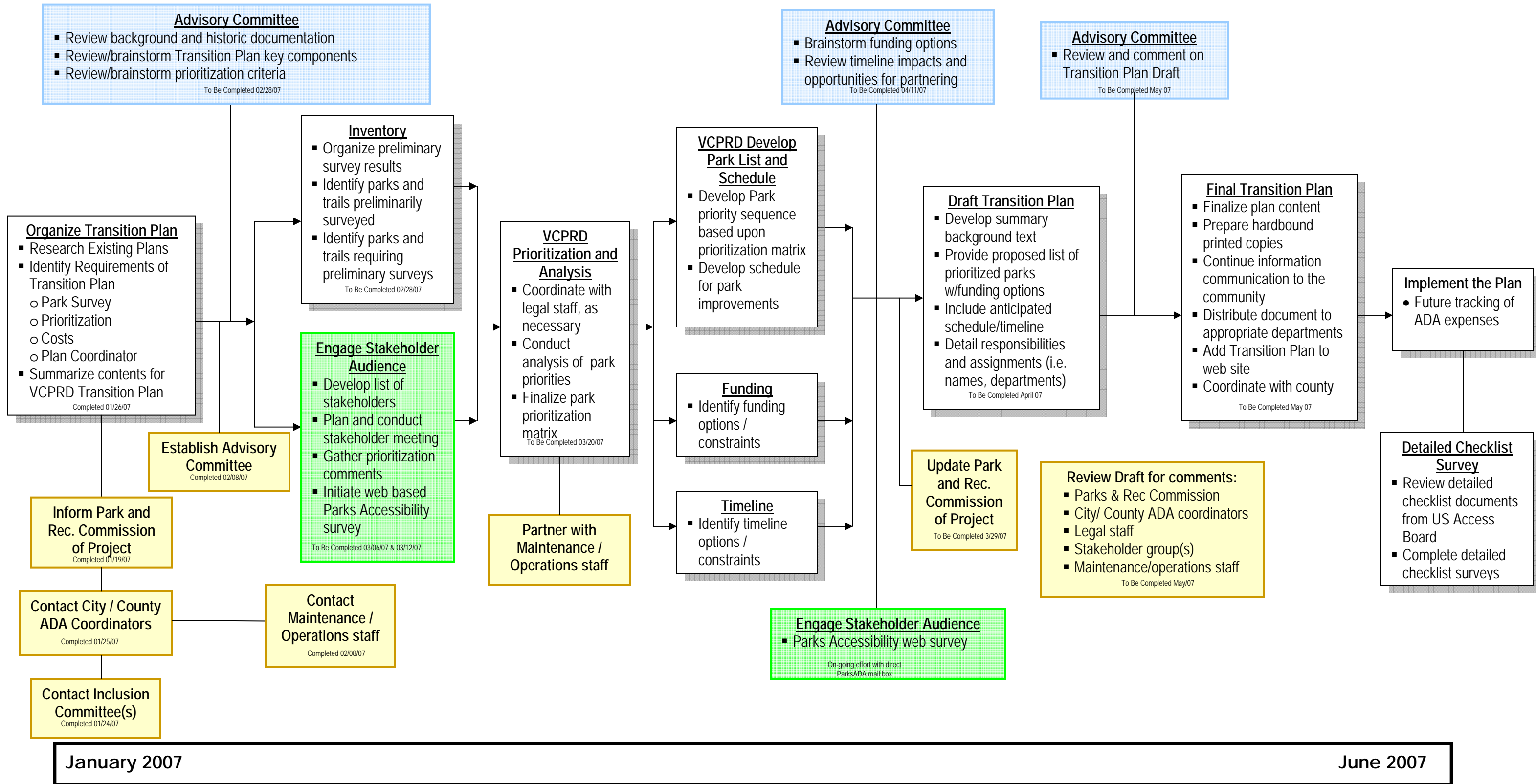
There are a number of plans within the VCPRD that helps to guide improvements throughout the entire Park and Recreation system. These plans, along with our partnering departments, guide the priorities for improvements. In addition to other department guidelines, this updated transition plan is connected to the following plans:

- *Vancouver – Clark Comprehensive Parks, Recreation, and Open Space Plan.*
- *Vancouver – Clark Parks and Recreation Department Business Plan.*
- Vancouver – Clark Parks and Recreation Department Performance Measures.
- City of Vancouver and Clark County Performance measures.

## **Transition Plan Update Development**

The city of Vancouver and surrounding Clark County experienced growth of over 13% since the 2000 US Census. This rapid growth created tremendous pressures on local government to provide the facilities and services needed within the Vancouver – Clark Parks and Recreation Department (VCPRD). Future growth is expected to continue, especially in the Urban Unincorporated Area (UUA) of Clark County. To support this rapid growth, the department completed updates to a number of strategic plans, including the *Vancouver – Clark Comprehensive Parks, Recreation & Open Space Plan* (2006), and the creation of the Metropolitan Park District to build 35 new parks, seven miles of trails and additional sports field (2005). All the new park development, to meet the expanding service needs, will be designed to current ADA guidelines. With each new park that is built, especially in the UUA, the overall percentage of accessibility throughout the park system increases.

The goal of this transition plan is to provide a framework for upgrading all existing park features to compliance with ADA. With the complete implementation of this plan, VCPRD would be 100% compliance with current guidelines. This plan was written based on current guidelines and it is understood that as new guidelines are issued, additional upgrades may be added to the to-do list for the department. The development of the VCPRD Transition Plan update began in 2005 with the creation and completion of accessibility field surveys, (Addendum A) of appropriate parks. The surveys and data were organized in 2006. In January of 2007, personnel were assigned to analyze and complete the updated Transition Plan using the following process and timeline.



### ***Parks Self Evaluation***

The VCPRD went through a rigorous inventory of all park features to determine overall compliance with current ADA guidelines. The goal of the surveys was to identify all barriers to accessibility throughout the parks and their individual features. The VCPRD utilized a format that had been utilized for Clark County and reviews all current park features and elements within the park system (Addendum A). The results of these surveys would provide the list of items to be repaired or upgraded to meet compliance.

### ***Survey Status.***

The completed surveys have been organized by park type (regional, community and neighborhood park level). Staff members surveyed the parks in teams of 2-3 members to verify data. Photos were also included with many of the notations to verify non-compliance features. The original data forms are in the VCPRD Design and Development division (six full size binders of data). The data for each park is also available in a Microsoft Access database for cross-referencing and organizing. It is the intent that the information will be shared with other departments as strategies are prepared to complete the upgrades for all park features to meet accessibility guidelines.

The date of each park accessibility survey serves as a “datum” point which is indicative of the state the facility at a particular date. In the time since this “datum” point, the VCPRD and the Operations Department of both the City of Vancouver and Clark County have identified and completed or removed barriers on an ongoing basis wherever possible. Therefore, some required physical improvements to facilities listed in the detailed surveys may have been started, partially completed, or even fully completed prior to the completion of this Transition Plan update. Additionally, the above-mentioned departments will continue to undertake structural modifications to facilities as part of regular capital improvement projects. Facility upgrades will also address other issues however they will be designed to meet new guidelines. The term “facilities” is intended to include buildings, structures, or any part of real property (i.e. park) that involves a specific use by citizens.

***Results.*** The results of the surveys validated the departments’ understanding that there is a broad gap throughout the system for meeting compliance goals. Some parks may be 99% accessible while others have minimal compliance. This reflects the age of some of the parks within our system that date back well before ADA guidelines were written. The majority of our less compliant sites include our older city parks as well as our outlying regional parks such as Lewisville. Refer to

Appendix \_\_\_\_ for a summary of typical improvements that will be required throughout the system.

The challenge, as identified in this plan, is to develop a priority structure for addressing needs in the system while resources are limited (funding, staff, materials, etc.). It is understood that it will most likely take several million dollars to upgrade all non-compliant features. Those types of funds are not currently available. The VCPRD would like to look at all options for upgrades that may include partnerships with other departments, grant opportunities, neighborhood association partnerships, other funding sources and all potential options for completing the broad range of projects.

As part of the transition plan process, staff met with many other department representatives, on a regular basis, to understand where funding can be combined and/or partnerships formed to better maximize dollars and resources to meet accessibility goals.

### ***Public Participation***

To engage citizens in the Transition Plan Update process, the department used a multi-format approach which focused on the experience of park users. The technique included a public meeting process as well as a forum for on-going input via a questionnaire. The feedback from citizens, whether it is citizens with disabilities, care givers, educators of special needs programs, etc., the information received provides valuable input that helps guide the priorities of how accessibility goals are met.

***On-going Feedback.*** A questionnaire was developed as a mechanism to gather citizens' accessibility concerns and issues on a long-term basis. The questions asked questions regarding type of use, access issues, suggested improvements and contact information for feedback, as necessary. This questionnaire is posted as an interactive web site on the VCPRD home page (Addendum B). Additionally a printed version is available upon request and at various Parks and Recreation facilities (Firstenburg Community Center and Esther Short building). The questionnaire was also made available via hard copy and the web in a Russian and Spanish format to serve our diverse community populations, (Addendums C and D). The results to date have primarily requested additional information to guide people to accessible features.

***Public Meetings.*** Two public forums were conducted, both day and evening time to reach the greatest audience, to engage citizens in accessibility discussions. The

meetings were moderately attended but had important feedback, including priority of ensuring access into the parks (routes, parking, pathways, etc), as well as updated information as to where the accessible features are located throughout the park system. Announcements regarding the public forums and the questionnaire were included in *The Columbian* newspaper, the City of Vancouver web page and a direct mailing list was developed to invite organizations that serve citizens with disabilities throughout the county. In addition, each organization on the mailing list was asked to forward the flyer invitation, (Addendum E) to their contacts. A summary of accessibility comments received from the public during the forum meeting are attached as Addendum F.

***Advisory Committee.*** A citizen advisory committee was also formed to help guide the development of this transition plan update. The committee met three times during the intensive 6-month process for drafting the document. The committee comprises of city and county ADA professionals, members of the local schools, caretakers of disabled citizens, individuals who work in a broad range of ADA accessible forums and a Park and Recreation Advisory Committee member (refer to the *Acknowledgment* page for names). The group provided invaluable feedback in verifying the process was inclusion, coherent and appropriate to meet the needs of Clark County residents.

### ***Prioritization Development***

***Background Research.*** Understanding that there is a significant number of projects to be implemented to reach the VCPRD goal for 100% accessibility in parks, staff researched other park department transition plans. The goal of the research was to verify the format and process other agencies were using to reach compliance. Other plans were available from various state and city park agencies. Eight other transition plans (Addendum G) were reviewed for content and process. A prioritization matrix was developed and utilized (Addendum H) to identify best practices utilized by other departments. The result of the research verified that other agencies had a range of depth to their transition plans (very detailed to minimal guidance), but the majority met the requirement for minimum information (self-evaluations, schedule and responsibility). In general, the complexity of park systems, changing ADA guidelines, limited available funding sources and increasing upgrade costs make the transition plans guiding documents as opposed to specific protocols for compliance. Only one document provided detailed plans for meeting 100% compliance throughout their system.

***Inter-departmental Collaboration.*** In order to meet the goals for the transition plan, there would need to be extensive collaboration amongst the various divisions of the

VCPRD, but also other city and county departments. Staff conducted several meetings with other departments to better understand their project priorities, available funding sources and opportunities for incorporating ADA compliance into their projects. Workshops were also held to educate the departments' management staff to the options available and to subsequently arrive at priorities for renovating facilities to adhere to the spirit and intent of ADA guidelines. Brainstorming, consensus building and validation were used by both the Advisory Committee and the Parks and Recreation Advisory Commission (PRAC) to arrive at the Vancouver – Clark Parks and Recreation Department prioritization criteria.

***Prioritization Criterion.*** The goal for prioritization is to identify the most efficient means to address the broad range of non-compliant features. This means maximizing the available funding and resources in the shortest time frame possible. For example, if there is a project within or near a park and there is a method to incorporate ADA upgrades into those plans, we will see cost savings from the construction standpoint. The priorities will also need to meet the features that are most important to affected citizens. We will need to apply these criteria across the range of our park system including regional, community and neighborhood parks. Fundamental criteria are as follows:

❑ ***Park Accessibility***

From the many comments that we have heard, a main consideration should be given to park accessibility, which includes the three P's of park facilities (parking, pathways, and "potties" (restrooms)). If people can not get into the park, they will not be able to use the other services, therefore we need to ensure that access to the park, whether from mass transit systems or personal vehicles or pedestrian access routes, people need to be able to get into the park. This criterion will only apply to community and regional parks, as we do not provide parking or restrooms at neighborhood parks.

❑ ***Park Uniqueness***

The uniqueness of a facility and its features gives an indication of the importance of the facility to the community. Many features that are unique to a facility cannot occur at another facility (i.e. the amphitheatre at Esther Short Park in downtown Vancouver that hosts many of the summer concerts).

❑ ***Level of Use by the Public***

The level of actual use by the public varies between facilities. Facilities that receive a high level of use by the public are given a higher rating. This information is difficult to quantify, but in general our neighborhood parks receive day use from seniors and stay at home parents, whereas our

community parks and regional parks have high use numbers on the weekends and are the focal points for larger gatherings.

❑ ***Geographic Distribution***

It is important that facilities are equitably distributed throughout the Park system in order to ensure maximum access for all citizens. Facilities that are best suited to serve the needs of all citizens received a higher priority for improvements.

Additionally, two other criteria were identified as secondary priorities which may cause a park to be identified as a higher priority. Those criteria are:

❑ ***Availability of Public Transportation with Proximity to Population Needs***

It was noted during the Public Forum that many disabled and/or handicapped citizens live in proximity to public transportation which becomes critical to their ability to access parks. Therefore higher consideration will be given to parks located on public transportation routes.

❑ ***Timing of Maintenance Improvements***

It is the intent of the VCPRD to focus on accessibility improvements in parks scheduled for routine maintenance upgrades. This effort should result in funding synergies to minimize contractor costs while maximizing accessibility improvements.

As we review funding options for each year against the list of outstanding compliance issues, we will apply the six criteria (with equal weight) to identify the best opportunities for upgrades throughout our park system. Wherever there are partnerships, opportunities to maximize efficiencies and a chance to best serve our community, we will pursue those options. The department reserves the right to change barrier removal priorities in order to allow flexibility in accommodating community requests, petitions for reasonable modifications from persons with disabilities, and changes in department programs.

## **Implementation**

***Background.*** The schedule for implementation of the ADA compliance will be an on-going task. There are a large number of improvements throughout the parks. These improvements will be the responsibility of several departments to implement, based on the task (i.e. sign install by Public Works versus bench upgrades by Maintenance, etc.). As ADA guidelines change over the years, our list of

improvements may change, as well. Ultimately, the VCPRD will need to verify compliance of all features compared against our self-evaluations. Because of the complexity of funding and coordination, it is difficult to set a strict timeline for completion of all upgrades. The department would prefer to set a guideline for continually reviewing the outstanding items and addressing a minimum number of improvements on an annual basis. This guideline would then be able to be reflected in our Business Plan performance measures (which will be revised in 2007).

Even prior to the transition plan being updated, the VCPRD has been continually striving to update facilities within their existing parks to meet ADA compliance. Our department is on a two-year budget cycle that we compare against our Capital Facilities Plan for identifying upcoming projects. During the spring 07/08 budget update effort, numerous projects were identified for improvements to address ADA accessibility in 07/08, including:

1. Marshall Center – complete renovation of the building interior and immediate grounds
2. Haagen Community Park – Phase I completed in 2006 added parking and trails and Phase II to be constructed in 2008 will add restrooms, more paths and play features, as well as benches and picnic tables.
3. Franklin Park – playground upgrades and path
4. Marine Park – restroom renovations and parking lot upgrades
5. Leverich Park – restroom renovation and playground upgrades
6. Burnt Bridge Creek – trail improvements
7. Neighborhood Parks – loop trails on selected parks, including Coop Park, Four Seasons Park and Centerpointe Park.

***Continued Success.*** To ensure a long term focus on accessibility improvements, six business process improvements have also been recommended. These include the following:

- An accounting cost element/account number to be created to record and track ADA accessibility improvement costs.
- Budget planning (currently on a two year cycle) will include specific parks/projects identified for ADA accessibility improvements.
- Parks identified for ADA accessibility improvements will be listed as a line item in the Department Business Plan.
- Performance Measures on parks ADA accessibility improvements will be included in the department business plan.
- Quarterly coordination meetings with other departments will review potential ADA improvement opportunities.

- At any project closure, accessibility improvements will be identified and an appropriate percentage of the costs will be attributed to the newly created cost element/account number for ADA accessibility improvements.

These six business process improvements would become the framework to provide the focus and direction to achieve the goal of improving accessibility to facilities for all citizens.

*Costs.* Given the extent of the projects for ADA compliance and the continually changing construction costs (i.e. concrete and bituminous pavement has seen a 20% increase in just the past year), it is difficult to assign an overall cost of the ADA compliance program. It would most likely take a dedicated staff person 6 months to process all of the costs associated with every project. By the time staff has completed the task, the data would be out of date. It would preferable to continue to use staff time to coordinate with other departments and partnerships to identify opportunities for implementation of projects. We do know that based on the data calculated from the self-evaluation process, it is fiscally impractical to immediately renovate all facilities that contain barriers to accessibility. The VCPRD would recommend setting a goal of spending \$20,000/year towards ADA compliance. Given budget cycles for all of the various departments involved and grant opportunities, this should be a reasonable goal.

### *Program Responsibility*

Overall the ADA parks accessibility improvement program is the responsibility of the Vancouver – Clark Parks and Recreation Department Director. In addition, the following City/County personnel will have the following responsibilities:

- *Park Designers/Landscape Architects* –
  - Review Park Accessibility Questionnaires prior to park updates – this could involve contacting citizens who have responded to specific parks (on-going requirement).
  - Complete detailed facility accessibility surveys to identify accessibility issues prior to any park upgrades (on-going requirement).
  - Ensure new or park upgrade designs and equipment meet ADA requirements (on-going requirement).
  - Ensure the inclusion of accessibility assurances in contracts with vendors and use agreements (on-going requirement).

- Ensure contractors perform their duties in a nondiscriminatory manner and to meet all ADA guidelines at the completion of the project (on-going requirement).
- Identify ADA accessibility improvement costs for projects to allow correct tracking of costs (on-going requirement).
- ***Parks and Recreation Management Staff*** –
  - Identify cost element/account number to enable tracking of ADA accessibility improvement costs (once).
  - Review designs and equipment for ADA adherence (on-going requirement).
  - Monitor ParksADA email in box for surveys (weekly).
  - Print, review (with City and County ADA Coordinators) and file electronic and hard copy of the Accessibility Questionnaire (as needed).
  - Communicate to the Maintenance Department any accessibility issues which can be corrected within the maintenance department (quarterly).
  - Identify and prioritize parks for ADA accessibility improvements during the budget cycle (on budget cycle).
  - Continue to monitor the progress of department divisions and protocols for ADA compliance staffing needs (i.e. design division for developing documents for park upgrades, recreation staff for *Access to Recreation* program, etc.) (on-going).
- ***Maintenance Departments*** –
  - Report date and time accessibility issues were completed to Parks and Recreation Management (monthly).
  - Partner with the Parks and Recreation Department Design staff to identify best choices for improving accessibility when undertaking repair or replacements to park equipment or amenities (as changes occur).
- ***Transportation Departments*** –
  - Partner with Parks and Recreation Department to improve accessibility to neighborhood parks by installing pedestrian access routes, curb cuts, ramps and ADA parking near park facilities and from mass transit routes.
- ***Communications Personnel*** –
  - Ensure links and usability of web Accessibility Survey (quarterly testing).
    - City ADA web site
    - County ADA web site

- Communicate park accessibility improvements via the web, newspapers, newsletters, brochures, TV, and any other media available (reviewed quarterly for updates).
- Improve and expand park accessibility information on the web.
- ***City/County ADA Coordinators***
  - Partner with the Vancouver – Clark Parks and Recreation Department to review and manage Accessibility Questionnaire issues (as needed).
  - Provide the VCPRD with updated ADA guidelines and information (as changes occur).
  - Partner with VCPRD to ensure the department programs and facilities continue to improve in meeting or exceeding the goals/vision of the VCPRD ADA Transition Plan for ADA accessibility (annual basis).

## Summary Statement

The VCPRD is dedicated to serving the needs of the City of Vancouver and Clark County residents and to provide universal accessibility to all facilities and programs. We will strive to make all of our facilities ADA compliant with the available resources in the shortest time frame as possible. We will continue to promote the *Access to Recreation* program that encourages all citizens to take part in the broad variety of programs designed to keep people active and healthy. To meet these goals, we will need to work internally and externally to identify partnerships and opportunities for improving our facilities and programs. We strive to be leader in the community for creating equal access for all citizens.