

Recreation and Park Commission for the Parish of East Baton Rouge (BREC) ADA Transition Plan

February 14, 2019

Acknowledgements

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Staff's insight into internal processes and their intimate familiarity with the properties were invaluable. During the planning process, staff was crucial in providing advisement on departmental programs and services, insight into the public's use of facilities, and assistance in the public input process. During the facility self-assessment process, staff support in providing access to facilities was critical. BREC staff contributed immensely to the creation of this plan.

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Executive Summary

The development of this Americans with Disabilities Act (ADA) Title II Transition Plan fulfills the requirements set forth in Title II of the ADA. The plan includes the involvement and review of the following Recreation and Park Commission for the Parish of East Baton Rouge (BREC) departments, listed in alphabetical order:

- BREC's Baton Rouge Zoo
- Communications
- Finance
- Golf
- Human Resources
 - Risk Management Division
- Information Technology
- Park Operations
 - Maintenance Division
- Planning & Engineering
 - CIP Division
 - Natural Resource Management Division
- Recreation
 - Special Facilities Division
 - Conservation, Outdoor Recreation, and Environmental Education (CORE)
- Superintendent's Office

The transition plan scope includes an analysis of programs and services as well as self-assessments of BREC-owned facilities. Approximately 876 programs and services were analyzed as part of this plan and 162 facilities were assessed. There were 17 facilities which were identified as undeveloped, one facility that was not operated by BREC, and one facility that was under complete construction at the time of this report. The undeveloped parks are included in this plan, but do not have any assessment information. All 181 facilities are listed in Appendix 1.

BREC is committed to providing access to all citizens and this plan will provide the framework to meeting ADA Title II requirements. Title II of the ADA requires that a public entity must reasonably modify its policies, practices, or procedures to avoid discrimination against people with disabilities. This plan will assist BREC in identifying current policies and physical barriers to accessibility as related to BREC-owned facilities.

The plan provides a recommended method for BREC to achieve program accessibility requirements as mandated by Title II of the ADA. The recommended method plans to address over 20 years all non-compliant elements in facilities that host programs or have BREC staff housed within the facility. This recommendation does not include relocating or replicating any programs or services. The projected budget for this recommendation is approximately \$28.7 million with 3.5% annual escalation.



Chapter 1 Background

This chapter provides a brief background regarding the need for an ADA Transition Plan. The ADA is a civil rights law with a broad scope affecting nearly every aspect of life for millions of Americans. The ADA ensures equal opportunity in the areas of employment, state and local government services, public accommodations, and telecommunications. The ADA was enacted on July 26, 1990 with Title II becoming effective on January 26, 1992. Title II was further revised on May 21, 2012. The ADA prevents discrimination against a person based on a disability. Title II is the section that mandates the creation of a Transition Plan.

The ADA defines a person with a disability as “a person who has a physical or mental impairment that substantially limits one or more major life activity. This includes people who have a record of such an impairment, even if they do not currently have a disability. It also includes individuals who do not have a disability but are regarded as having a disability. The ADA also makes it unlawful to discriminate against a person based on that person’s association with a person with a disability.”

In accordance with the ADA, state and local government agencies with over 50 employees are obligated to conduct an assessment of their facilities, programs, and services. Agencies then must create a Transition Plan to address those barriers identified in the assessment by providing suggested remedies, cost analysis and time frames in which to eliminate these barriers. In effect, an ADA Transition Plan is a document that demonstrates how government entities transition toward compliance with the ADA in a specific timeframe. Although the ADA requires that a facility’s services, activities, policies, and programs be accessible in the most integrated manner possible, it does not require agencies to make structural changes to existing facilities if compliance can be achieved by alternate means. An example of alternate means can be moving a program from a non-compliant facility to a compliant facility.



Independence Botanic Gardens

This chapter outlines the technical requirements for completing a Transition Plan under ADA Title II. While this plan is intended to meet all ADA Transition Plan requirements, it also utilizes a large GIS component to capture existing site conditions and perform more complex analysis of the data. The findings of this plan can also be used as an asset management tool to identify and plan for corrections of existing infrastructure. This information can be used to coordinate the programs and services provided by BREC.

1.1 Legal Requirements

As stated in the Background, the ADA is a federal civil rights law intended to prevent discrimination against persons with disabilities. The legislation contains the following five titles:

- Title I: Employment - Prohibits employment discrimination against otherwise-qualified individuals with disabilities.
- Title II: Public Services and Transportation - Prohibits discrimination in accessing services (including employment to the extent not already covered by Title I) provided by state and local government entities.
- Title III: Public Accommodations - Prohibits discrimination in places of public accommodation, commercial facilities and transportation.
- Title IV: Telecommunications - Mandates that telecommunication devices be in place for persons with hearing impairments.
- Title V: Miscellaneous.

Title II of the ADA prohibits discrimination by public entities on the basis of disability by making programs, services and activities accessible to persons with disabilities. To accomplish this, the Department of Justice developed regulations requiring government agencies to conduct an evaluation of the accessibility of its programs and services to determine whether issues of accessibility could be addressed through changes in the way such programs and services are provided. BREC is obligated to remove physical barriers to accessibility when program changes cannot ensure access to services, programs, and activities in existing facilities. Title III applies because some BREC-owned facilities are rented to third-party providers that are concessioners or that provide programs and services.

As mentioned earlier, ADA Title II was amended May 21, 2012 and is used as part of this plan. The amended requirements are found in Federal Register 28 Code of Federal Regulations (CFR) Part 35. Highlights of the Title II requirements applicable to BREC as part of this scope of work include, but are not limited to:

- Section §35.105 Self-evaluation
- Section §35.107 Designation of responsible employee and adoption of grievance procedures
- Section §35.130 General prohibitions against discrimination
- Section §35.133 Maintenance of accessible features
- Section §35.150 Existing facilities
- Section §35.151 New construction and alterations
- Section §35.163 Information and signage

With the understanding that the structural changes would take time and funding, the regulations allow for the creation of a Transition Plan to implement the changes over time. Federal Register 28 CFR Part 35 states that if structural changes to facilities will be undertaken to achieve program accessibility, a public entity that employs 50 or more

persons shall develop a Transition Plan setting forth the steps necessary to complete such changes.

The ADA requires that the Transition Plan contain the following, at a minimum:

- Identify and list physical barriers in the public entity's facilities that limit the accessibility of its programs or activities for individuals with disabilities.
- Describe the methods that will be used to remove the barriers and make the facilities accessible.
- Develop a schedule to achieve compliance with Title II, with annual updates on the progress of the plan.
- Identify the official responsible for implementation of the plan.

ADA Title II Program Access

Title II provides guidance on how a government entity such as BREC can achieve compliance. Within 28 CFR 35.150(a), a public entity is required to provide programs and services, when viewed in their entirety, to be readily accessible to and usable by individuals with disabilities. The key phrase is “when viewed in their entirety”. In other words, not every single service or facility must be made accessible. Instead, the overall network of services and facilities must be made accessible. For example, where one service is provided at a non-compliant facility, the same service can be duplicated or moved to an accessible facility.

Title II does not require a public entity to make each of its existing facilities accessible, to take any action that would threaten or destroy the historic significance of a historic property, or to take any action where it can demonstrate that the action would result in a fundamental alteration to the nature of its services, or cause an undue financial and administrative burden.

The requirements provide further guidance on the process of determining undue financial and administrative burden:

“In those circumstances where personnel of the public entity believe that the proposed action would fundamentally alter the service, program, or activity or would result in undue financial and administrative burdens, a public entity has the burden of proving that compliance with §35.150(a) of this part would result in such alteration or burdens. The decision that compliance would result in such alteration or burdens must be made by the head of a public entity or his or her designee after considering all resources available for use in the funding and operation of the service, program, or activity, and must be accompanied by a written statement of the reasons for reaching that conclusion.”



The program access test was applied to the programs and services offered by BREC in conjunction with the property self-assessments in developing recommendations. Briefly, the program access test looks at programs and services being offered in their entirety and looks for access and compliance in the context of the overall system. The recommendations in this plan will be aimed at satisfying the program access test.

1.2 BREC's History in Accessibility Compliance

BREC has a long history of accessibility compliance and inclusion. It is apparent that BREC has made continual efforts to provide access to properties as well as programs and services. These efforts include undertaking accessibility-specific improvement construction projects, providing adaptive equipment, creating master plans that directly impact accessibility, providing alternate means of communication, and creating permanent staff positions to assist in the inclusion of all citizens.

Below are highlights of these examples.

BREC Inclusion Services

Adaptive Recreation is a program that provides social and recreational services to all patrons with physical or developmental disabilities.

“Our goal is to offer a positive and supportive learning environment where individuals can explore new recreation skills, develop socialization skills through friendships and have opportunities to gain a sense of independence in their community. Inclusive recreation takes place when individuals of all abilities participate in a recreational activity together in an attempt to decrease barriers to leisure by utilizing adaptations and programming accommodations. The concept of inclusive recreation makes it possible for individuals to choose from a vast array of programs offered by BREC across the parish.”

In partnership with The ARC of Baton Rouge, BREC provides various inclusive leagues to participants. The leagues are open to people with and without disabilities. These noncompetitive leagues teach the sport, allow participants to enjoy playing with peers, and promote inclusivity.

Development of Master Plans

Several plans and procedures have been developed that specifically address accessibility issues. The Imagine Your Parks Strategic Plan, dated July 2004, is an organization-wide plan “to guide in the future direction of BREC.” The plan specifically mentions accessibility:

“The second most encountered issue observed during the audit was the lack of ADA required access to parks and their facilities. New facilities in the BREC system are ADA compliant, but many older facilities need updating.”



“The facilities are structurally sound, however, major renovation work should be considered to address ADA and other updates for special program requirements/activities.”

The Imagine Your Parks Strategic Plan, dated November 2014, is “a vision and action plan for the parks and recreation in east Baton Rouge Parish that builds on the successes of BREC’s original Imagine Your Parks plan.” The plan specifically mentions accessibility:

“Inclusive recreation provides opportunities for individuals with and without disabilities to participate in recreation activities together. For individuals with disabilities to participate as fully as possible, BREC provides reasonable accommodations like individualized techniques and resources used to enhance program participation without fundamentally altering a program. BREC partners with the ARC Baton Rouge, Baton Rouge Soccer Association, and the Baton Rouge Kickball Association to offer inclusive sport leagues for ages 3 and older, including tee ball, coach’s pitch, softball, soccer, kickball, and basketball. Through a partnership with Families Helping Families of Greater Baton Rouge, BREC offers monthly Sunshine Socials for adults with disabilities and their friends and family. In addition, BREC offers inclusive community events, recreation classes, and summer camps.”

Project History

Since 1992, BREC has made continuous improvements to address accessibility needs. The improvements have come in the form of new construction, renovation projects, and ongoing maintenance projects. It is estimated that BREC has completed approximately \$70,000,000 in construction and renovation projects over the last 10 years. These projects included accessibility improvements. The list below provides examples of these types of projects.

“I am a 59-year-old double below the knee amputee. I know the importance of getting out to exercise and play sports. It has vastly improved my quality of life. Infrastructure and programs are both important. I applaud the improvements I’ve witnessed the last few years.”

Chapter 2 Policies and Procedures

Altura Solutions recommends that BREC have a set of policies and procedures to help ensure compliance with ADA requirements. There is a set of policies and procedures that we believe will help satisfy the minimum requirements. However, we also recommend that BREC develop and implement a set of policies and procedures that will complement the organization's existing operating procedures.



Scotlandville Parkway

The key is the transparent and consistent application of the policies across all of BREC. It is apparent that BREC has a great “can-do” attitude for providing accommodations and requests, but we highly recommend a set of uniform policies that are applied consistently across the organization. We recognize that some departments might need customized policies to address situations unique to that department. However, specialized policies should be the exception and consistent BREC-wide policies should be the norm.

Tables identifying the specific policy and recommendations by department are provided in Appendix 5. Many policies and procedures that are recommended to be implemented by BREC are further detailed below.

Provide Public Notice

All public entities must provide information to the public, program participants, program beneficiaries, applicants, and employees about the ADA and how it applies to the public entity. BREC has a notice on its website, but we recommend expanding the notification to include other venues:

- Include the notice in social media such as Twitter and Facebook.
- Enhance visibility of the notice on BREC's website.
- Post the notice at facilities.
- Publish the notice in local newspapers.
- Broadcast the notice in public service announcements on local radio and television stations.

Examples of Alternative Formats include:

- Captioned public service announcements on television
- Sign Language Interpreters
- Large print
 - Recommended: san-serif typeface, 18-point size
 - If a request is made for a specific point size, provide notice in that size
- Braille
- Text file on a thumb drive or emailed to the person
- HTML format on an accessible website
- Audio recording
- Radio announcement

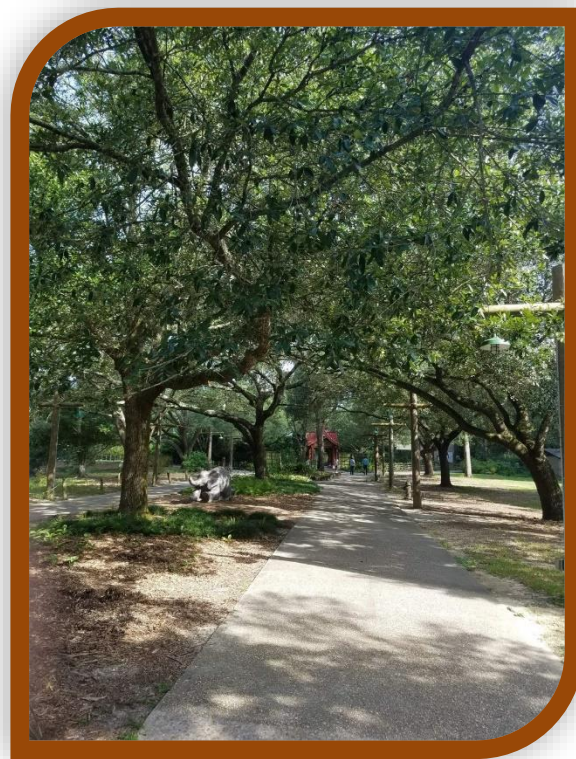
Include the notice in program announcements and applications. Examples include: job announcements, program applications, and boards and commission meetings.

Appoint ADA Coordinator

ADA Title II mandates that a public entity such as BREC designate at least one person responsible to coordinate ADA compliance for the public entity. This person is typically known as the ADA Coordinator. As of the date of this report, BREC did not have an ADA Coordinator. However, BREC had posted the job description and was accepting applications for the job as of the date of this report. Until the position is filled, we recommend appointing an existing BREC staff member to that responsibility. The plan's recommendation is further detailed in Chapter 3.

Appoint Departmental ADA Liaisons

We recommend that BREC appoint Departmental ADA Liaisons (Liaisons) to assist the ADA Coordinator with ensuring ADA compliance for BREC. This will be especially important as the new ADA Coordinator begins to get familiar with the organization and each department. Liaisons can be of great value to the ADA Coordinator in navigating BREC's processes and procedures. The plan's recommendation is further detailed in Chapter 3.



Baton Rouge Zoo

Adopt a Grievance Procedure

We recommend BREC establish a grievance procedure and post it prominently on the website. It is also recommended to post it in several visible locations.

Altura recommends that BREC's grievance procedure include the following:

- A description of the procedures for submitting a grievance.
- The steps that will be taken by BREC staff.
- Reasonable, specific time frames for review and resolution of the grievance.
- A two-step review process that allows for appeal.
- Appeals only granted if new information is submitted.
- Record-keeping for complaints submitted.
- Documentation of steps taken towards resolution.

Proposed Grievance Procedure:

BREC is required by the ADA to adopt and publish grievance procedures, providing for prompt and equitable resolutions of complaints or grievances alleging any action that would be prohibited by Title II of the ADA. Although a BREC-wide ADA grievance procedure has been developed, not all BREC staff are aware of the procedure. It is recommended that a revised procedure be adopted and implemented BREC-wide to provide a consistent process and result. The proposed revised grievance procedure is described below.

Grievance Procedures and Instructions:

Any person with a disability or any parent or guardian who represents a minor with a disability, who believes that they have been the subject of disability-related discrimination and the denial of access to facilities, programs, or services may file a grievance or complaint.

Step 1: File an ADA Grievance Form

The complainant should fill out the ADA Grievance Form, shown in the Appendices, giving all the information requested. The ADA Grievance Form should be made available to the public in various formats. The ADA Grievance Form should be filed in writing with the BREC ADA Coordinator (ADA Coordinator) within 60 days of the alleged disability-related discrimination. Upon request, reasonable accommodations will be provided in completing the form, or alternative formats of the form will be provided.

Step 2: An Investigation is Conducted

A notice of receipt shall be mailed to the complainant by registered mail within five working days of the receipt of the complaint or grievance, and the ADA Coordinator or another authorized representative shall begin an investigation into the merits of the complaint within 60 days. If necessary, the ADA Coordinator or another authorized representative may contact the complainant directly to obtain additional facts or documentation relevant to the grievance. If the complainant alleges misconduct on the part of the ADA Coordinator, another authorized representative may be appointed by



the Chief of Business Management to undertake the investigation if the allegations can be substantiated. After the grievance is received, the complaint shall be brought before the ADA Coordinator and Person Responsible for Plan Implementation.

Step 3: A Written Decision is Prepared and Forwarded to the Complainant

The ADA Coordinator shall prepare a written decision, after full consideration of the grievance merits, no later than 75 working days following the receipt of the grievance. If the complaint alleges misconduct on the part of the ADA Coordinator, another authorized representative may be appointed by the Chief Business Manager to prepare the written decision if the allegations can be substantiated. A copy of the written decision shall be mailed to the complainant by registered mail no later than five working days after preparation of the written decision.

Step 4: A Complainant May Appeal the Decision

If the complainant is dissatisfied with the written decision, the complainant may file a written appeal with the Chief Business Manager no later than 30 working days from the date that the decision was mailed. The appeal must contain the following information to be considered by BREC:

1. A statement of the reasons why the complainant is dissatisfied with the written decision.
2. New information that was not provided previously which may alter the Written Decision issued in Step 3.
3. The document must be signed by the complainant, or by someone authorized to sign on the complainant's behalf.

A notice of receipt shall be mailed to the complainant by registered mail within five working days of the receipt of the appeal. If the three elements listed above are not met, the appeal will not be considered by BREC. The Chief Business Manager will notify the complainant that the criteria for an appeal were not met within five working days of receipt of appeal.

The appeal reviewers, consisting of the ADA Coordinator and the Chief of Business Management, will act upon the appeal no later than 60 working days after receipt, and a copy of the appeal reviewers' written decision will be mailed to the complainant by registered mail no later than five working days after preparation of the decision. The decision of the appeal reviewers will be final.

The ADA Coordinator and Chief Business Manager will maintain the confidentiality of all files and records relating to grievances filed, unless disclosure is authorized or required by law. Any retaliation, coercion, intimidation, threat, interference or harassment for the filing of a grievance, or used to restrain a complainant from filing, is prohibited and should be reported immediately to the ADA Coordinator or Chief Business Manager, depending on the case.



Non-Discrimination in Employment

Although BREC has a brief statement of accommodations on the Jobs page of the website, we recommend that a more formal Equal Employment Statement be adopted.

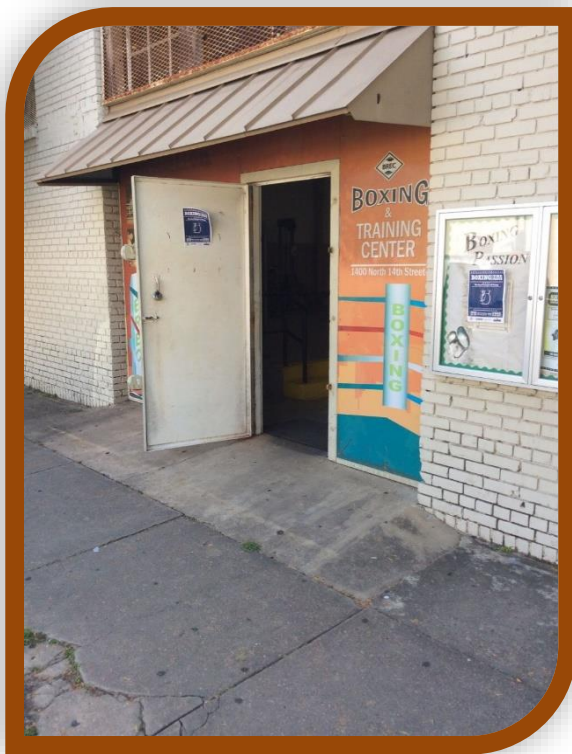
It is apparent that BREC staff has a very positive attitude for providing reasonable accommodations, but we recommend developing an organizational Reasonable Accommodation Process that can be applied to both Applicants and Employees. As part of the process, a review of essential functions for all positions should be conducted. The process should include policies and procedures for requesting and reviewing requests utilizing the Interactive Process. For consistency, forms should be developed for requesting accommodations, medical information, necessary medical waivers and organization reviews.

A section should be added for assisting with a service animal accommodation. The same process should be applied to volunteers, and the Equal Employment Statement should be included in the volunteer application. If a Return to Work policy exists, we

recommend its use for the Reassignment to another position accommodation option.

When appropriate for employment exams and promotions, BREC is recommended to ensure equal access to exams and trainings with accessible locations, alternative formats, and auxiliary aids.

We recommend that Title I employment training be provided primarily to managers and supervisors. Additionally, a section should be added to the New Employee Orientation with basic information on employees' rights under ADA and how to apply for a reasonable accommodation.



North 14th Street Park Boxing Center

Program Accessibility

Altura Solutions recommends a BREC procedure for modifying policies, practices and procedures for program participation. During our review we found several camp assessments and the Camp Sunshine Inclusive Summer Camp Policy. These are good examples of localized procedures, but we recommend a BREC policy to encompass all programs. The policy should comprise a process for requesting and reviewing program participation and circumstances for denial. This policy should also consist of a service animal policy for the public. To enhance program participation, we also recommend disability awareness training, specifically for staff having interactions with the public.

Effective Communication

Formal BREC policy and procedure is recommended for the public's request for alternative forms of communication and auxiliary aids and services. This policy should contain a process for securing Sign Language Interpreters and caption services with appropriate timelines. We recommend establishing the tracking of these requests throughout the organization.

Also important for accessibility are effective telephone and electronic communications. Consider using standard templates for email and adding interactive elements for kiosks. When possible, utilize a variety of methods to convey information to the public, such as visual media, including posters, television, and audio recordings.

According to our review, BREC currently has no policies and procedures for web accessibility. We recommend consistent training for appropriate staff, especially in departments that have recurring content on their website. With the use of social networking sites, accessibility of those sites to persons with disabilities is considered program access.

The major categories of disability that Web Content Accessibility Guidelines (WCAG) addresses are visual, hearing, motor and cognitive. The following are some quick tips from the Web Accessibility Initiative:

- Provide contrast between foreground and background.
- Do not use color alone to convey information.
- Ensure that interactive elements are easy to identify.
- Provide clear and consistent navigation options.
- Ensure that form elements include clearly associated labels.
- Provide easily identifiable feedback.
- Use headings and spacing to group related content.
- Create designs for different viewport sizes.
- Include image and media alternatives in your design.
- Provide controls for content that starts automatically.



Emergency Preparedness, Evacuation and Sheltering in Place

Making sure that people with disabilities have full access to BREC emergency preparedness and response programs is a critical part of ADA obligations. While our review of the current programs does allow for this access, it is our opinion that these processes can be improved by centralizing them BREC-wide.

Issues that have the greatest impact on people with disabilities include:

- **Notification-** Many traditional emergency notification methods are not accessible to or usable by people with disabilities. People who are deaf or hard of hearing cannot hear radio, television, sirens, or other audible alerts. Those who are blind or who have low vision may not be aware of visual cues, such as flashing lights. Warning methods should be developed to ensure that all citizens have the information necessary to make sound decisions and take appropriate, responsible action.
- **Evacuation-** People with a mobility disability may need assistance leaving a building without a working elevator. People who are blind may not be able to use traditional orientation and navigation methods. A person who is deaf may be trapped and unable to communicate because the only communication device relies on voice. Procedures should be in place to ensure that people with disabilities can evacuate the physical area under different conditions.
- **Emergency transportation-** Accessible transportation may be needed to evacuate people with disabilities. Some communities have used lift-equipped school buses to evacuate wheelchair-bound people during floods.
- **Medication, refrigeration, and backup power-** A reasonable number of shelters should have backup generators and a way to keep medications in a refrigerator or a cooler with ice. These shelters should be made available on a priority basis to people who require access to electricity and refrigeration, for example, those using life sustaining medical devices or motorized wheelchairs, and those needing to preserve medications.
- **Locations of accessible emergency shelters and other shelters with specific features-** The public should be notified about the location of these shelters. Emergency personnel need lists of where they are and information should be easily found on websites.
- **Service animals-** People with disabilities who use service animals should not be separated from their service animals, even if pets are not permitted. Service animals are the responsibility of their handlers, who must keep them under control at all times.
- **Access to information-** Communication must be accessible for people who are deaf or hard of hearing. Staff and volunteers should be trained in basic ways to provide accessible communication, including exchanging notes or posting written announcements to go with spoken announcements. Staff and volunteers should read printed information, upon request, to people who are blind or who have low vision.

BREC Contracts - Contracting with Other Entities

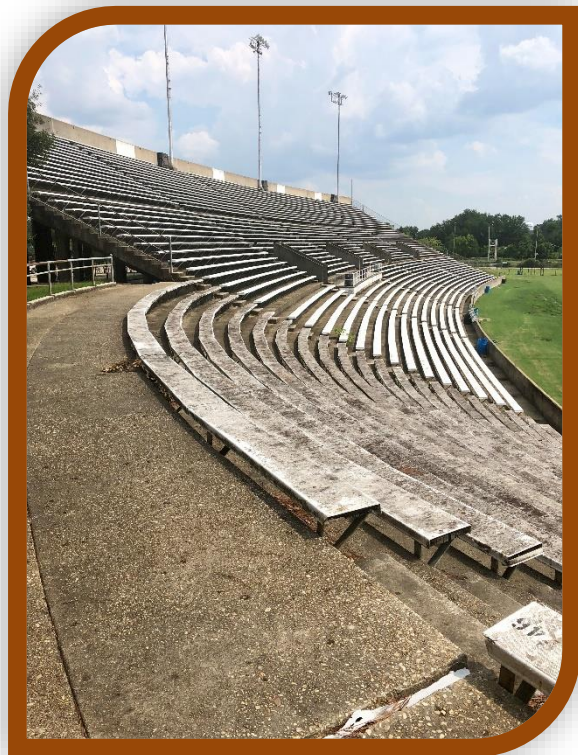
The general nondiscrimination requirement and all of Title II apply whether BREC provides the program, service or activity itself or is contracting with another entity to do so. This is particularly important because over the last 20 or so years many government services have been privatized. In these cases, BREC must make sure the private business or organization it is contracting with upholds the same level of obligation as the public entity itself.

Upon review of the information and contracts provided, it is evident that consistent ADA language is needed BREC-wide to ensure that contractors or any outside entities abide by ADA Title II obligations. This protects BREC from potential violations perpetrated by its contractors/vendors. We recommend developing a policy for contracting with these entities for the purchase of items or services as well as leases.

Examples of third-party vendors include the use of food vendors at BREC events and use of vendors for BREC-sponsored public educational training. It is recommended that BREC review all agreements for locations where BREC is leasing space or where BREC-sponsored events are held. The agreements should clearly identify the responsibilities for ADA compliance.

Training

During the staff interview process, it was discovered that BREC does not have an ongoing ADA training program. Some departments provide training that tangentially involves ADA compliance, but no ongoing ADA specific training was identified. Other departments provide one-time training on specific ADA topics. However, we recommend that departments establish and provide an ongoing ADA training program for staff.



Memorial Stadium

The following training topics are recommended for staff:

- **New Employee Orientation** – As BREC adds staff, an ADA component should be added to the new employee orientation program. The topics can include an introduction to BREC’s non-discrimination policies, identification of employees’ rights, and related ADA policies and procedures.
- **Employment** – Any existing or new staff that directly manage others should have training on employment issues such as reasonable accommodations. Newly developed policies as part of this Transition Plan should be included in the training to help ensure consistent BREC-wide application.
- **Disability Awareness** – Staff that directly interact with the public should receive training to expose staff to the most recent and acceptable terms and person-first language in relation to people with disabilities. The training should include part-time and seasonal employees, as well as volunteers working on behalf of BREC. Employees and volunteers working during emergency situations will also benefit from this training.
- **Technical Standards** – Staff that provide design, plan review, inspection, or project management services should be provided with ongoing training on the scoping and technical standards of the ADA. Currently, BREC relies on the professional designer to achieve ADA compliance. While BREC provides similar training for compliance with the building code, there are some differences between the International Building Code (IBC) and ADA standards. BREC also currently relies on one staff member within Development Services to provide answers to ADA-specific plan review questions. Having the knowledge to identify discrepancies between the ADA and IBC is a valuable skill that will serve BREC well moving forward.
- **Information Technology/Communications** – As part of departmental interviews, there was a gap identified in understanding the ADA requirements as they apply to software, technology-related hardware, social media applications, and website compliance. We recommend that BREC staff be trained on ADA compliance in relation to the various technology components used by the organization. The recommended training is further detailed in Chapter 5.



Magnolia Mound Plantation

Chapter 3 ADA Coordinator and Person Responsible for Plan Implementation

Per the ADA Title II requirements, a person must be assigned to be responsible for implementing the Transition Plan. Typically, the person responsible for the plan's implementation is the ADA Coordinator. However, BREC is currently in the process of hiring the organization's ADA Coordinator. Until the BREC ADA Coordinator is hired, the person responsible will be Reed Richard, Assistant Superintendent of Planning and Engineering. As soon as the BREC ADA Coordinator is hired, the person's contact information should be made available to BREC staff as well as the public.

Reed's contact information is provided below:

Reed Richard

Assistant Superintendent of Planning and Engineering

6201 Florida Blvd., Baton Rouge, LA 70806

Phone: 225-272-9200

As in other entities around the country, we recommend appointing Departmental ADA Liaisons (Liaisons). The responsibility of ensuring ADA compliance across the whole organization is a difficult task for a single person. Liaisons who report to the ADA Coordinator facilitate the creation of a network of professionals aligned with the ADA policies and procedures at various levels within BREC. This will assure consistent and equitable compliance with all policies and procedures for BREC. Each Liaison can provide their specific knowledge and expertise to help ensure ADA compliance. Liaisons can also specialize in specific areas of the ADA and add a layer of expertise to the organization that one person alone would have a difficult time in acquiring. For example, some Liaisons can specialize on the technical requirements for the built environment while others can focus on hiring practices and requests for reasonable accommodations. The recommended structure will be invaluable as the new ADA Coordinator is hired and can benefit from the Liaisons' institutional knowledge of each department and BREC as an organization.

We recommend that a minimum of one person from each department be appointed as a Liaison. Each Liaison should be carefully selected based on their interest and background as well as knowledge of their specific department's needs. As a group, all Liaisons and the ADA Coordinator should meet once a month to discuss the progress made on the ADA Transition Plan and other ADA related issues. At these meetings, Liaisons should submit reports indicating the progress made on the plan and other issues such as requests for alternative means of communication or number submitted grievances. The ADA Coordinator can then aggregate each Liaisons' monthly report into the mandated annual update to the ADA Transition Plan. A sample monthly report is in Appendix 5.

3.1 Annual Update

The ADA Coordinator is responsible for updating this plan annually. At a minimum, the following components should be updated every year:

- Self-assessment reports for any construction projects completed within the year
- GIS layer to reflect the alterations to facilities
- The 20-year schedule for any shifts in the budget or the facility schedule
- Person responsible information once the ADA Coordinator is hired
- ADA Training Schedule
- Status of BREC's website regarding ADA compliance

The following facilities had some or all of the facility under construction during the 2018 year when the self-assessments were performed. These construction projects should be evaluated, and the self-assessment reports updated as part of the first annual update.

Facility	Project
Acadian Thruway Park	Whole Park Renovation
Ben Burge Park	Council on aging misc. work in Recreation Center
Bluebonnet Swamp	Parking Improvements
Church Street Park	Recreation Center
City-Brooks Park	Croquet/Trailhead
Cunard Park	Whole Park Renovation
Erich Sternberg Park	Whole Park Renovation
Fiesta Neighborhood Park	Whole Park Renovation
Forest Park	Recreation Center flooding repair
Goodwood Park	Install bike racks and station
Hartley-Vey Gardere	Whole Park Renovation
Highland Park	Shade Sails at Playground
Howell Park	First Tee-Golf area
Howell Park	Old Golf Pro-shop and Gymnasium demolition
Independence Community Park	Garden Center Renovation
Kendalwood Road Park	Welcome Kiosk
Longfellow Neighborhood Park	Whole Park Renovation
Lovett Park	Recreation Center
Magnolia Mound Plantation	Hart House
Mayfair Park	Whole Park Renovation
Mills Avenue Park	Park renovation excluding Recreation Center
North 14th Street Park	Miscellaneous work to prepare for renovation
Railey Roshto Park	Whole Park Renovation
Riverbend Park	Whole Park Renovation
Wards Creek Trail	Crossing at Ochsner Health Center
Webb Memorial Golf Course	Cart Parking Area
West Brookstown Park	Whole Park Renovation
Milton J. Womack	Parking lot/Multi-Use fields
Baton Rouge Zoo	Miscellaneous work

Year 1 within the proposed plan is 2019. For Year 1, BREC currently has many CIP construction projects planned for 2019. As part of the annual update, these construction projects should be assessed and the self-assessment report for each facility should be updated to include any architectural barriers removed. The 20 year schedule and budget should be updated to consider these items, which will likely reduce the overall budget. See Appendix 11 for a list of proposed Projects for 2019.



Cohn Arboretum

Chapter 4 Public Engagement

The public engagement process is critical to obtaining the community's input and for the ultimate adoption of the Transition Plan. It is a federal requirement that stakeholders be included in the process of developing the Transition Plan. BREC elected to reach out to the community to obtain input on prioritizing properties and elements within properties, prioritizing programs and services, and for assistance in identifying opportunities to improve existing policies. The project created several avenues for the public to provide input and interact with BREC staff during the creation of the Transition Plan. The public outreach plan included two open houses, in-person interviews at BREC facilities, and the posting of an online survey to capture public and staff priorities for accessibility.

To support the open house and in-person interviews, hardcopy and electronic flyers were created and distributed to community stakeholders. Various social media notifications were also posted. The distribution list was created with input from BREC staff to reach the public, with a focus on local members of the community with disabilities.



Open house forum with community stakeholders

The first open house was held on May 1, 2018 in the Ballroom at the BREC Headquarters Building. The following Saturday, May 5th, in-person interviews of the public were conducted at Independence Park Main Library and at various locations on the grounds of Independence Park. An online survey was also available for public input from May 2, 2018 through July 13, 2018. A total of 215 responses were received as part of the online survey. The second open house was held on September 18, 2018 in the Ballroom at the BREC Headquarters Building. The results of the public input process helped identify the needs and wishes of the community.

When asked which BREC facilities were important to be accessible for the community, the results are summarized below:

Type of Facility	Percent of Vote
Parks	20.9%
Recreation Centers	18.4%
Special Use Facilities (Bluebonnet Swamp, Liberty Lagoon, etc.)	17.2%
Trails	16.0%
Sports Facilities	11.7%
Aquatic Facilities	11.0%
Golf	2.5%
BREC Headquarters	2.5%

When asked which elements within a park are most important, the results are summarized below:

Elements within a Park	Percent of Vote
Accessible Parking	20.1%
Restrooms	19.5%
Routes and Trails	17.4%
Playgrounds	12.8%
Drinking Fountains / Trash Cans	8.7%
Picnic Tables	6.7%
Sport Courts / Fields	6.7%
Seating / Bleachers	4.7%
Fitness Equipment	3.4%

When asked which elements within a building are most important, the results are summarized below:

Elements within a Building	Percent of Vote
Accessible Route from Transportation	21.3%
Special Use Spaces (museums, auditoriums, classrooms, etc.)	20.6%
Restrooms	19.1%
Accessible Parking	16.9%
Additional Elements (drinking fountains, telephones, etc.)	7.4%
Interior Route	6.6%
Reception / Point of Sale	4.4%
Entrances	3.7%

The results of the public input process were taken into account when determining which types of facilities to prioritize and in prioritizing the elements within the facilities.

Details of the public input process, online survey, and staff input are provided in Appendix 10. The comments from the public input process that relate to establishing priorities are further discussed in Chapter 7.

Chapter 5 Programs and Services Analysis

A series of face-to-face meetings and conference calls were held with BREC staff to document and understand the programs and services provided by the organization. In conjunction with the meetings, BREC staff provided listings with descriptions of programs and services and the properties that host each program, which were analyzed as part of this plan. A list of the programs and services is provided in Appendix 2.

A total of 876 individual programs and services have been analyzed as part of this plan. An individual program may be provided at a single location or duplicated at several locations. For example, the program titled “Karate” is counted as 13 programs since it is offered a total of 13 instances at various times and locations.

“Everything should be promoted more. Great services but need to get out to ALL of the community.”

There are 544 programs and services that are offered at multiple locations and 332 programs offered at a single location. To achieve program accessibility, the programs and services offered at only a single location should be provided at an accessible property. If an individual program or service is not offered at an accessible property, the program or service should be relocated to or duplicated at an accessible property or properties with geographic distribution as a consideration.

A complete listing of facilities with the number and type of programs and services they host is provided in Appendix 2. The following is a summary of the 10 facilities that host the most programs and services:

Table 5 – Facilities tat Host the Most Programs and Services

Facility Name	Total Activities	Percentage of Activities
Independence Community Park	81	9%
Highland Road Community Park	77	9%
Bluebonnet Swamp Nature Center	37	4%
Perkins Road Community Park	35	4%
North Sherwood Forest Community Park	32	4%
Anna T. Jordan Community Park	29	3%
Baton Rouge Zoo	27	3%
Antioch Boulevard Park	25	3%
City-Brooks Community Park	25	3%
Santa Maria Golf Course	23	3%



Chapter 6 Self-Assessments

As part of the Transition Plan, a self-assessment survey of the existing BREC properties was performed. A total of 162 BREC owned properties - except for undeveloped sites - are part of this plan. This chapter presents the technical standards and assessment strategy used to determine accessibility compliance.

The self-assessments were conducted over a six-month period from April 30, 2018 through October 5, 2018.

6.1 Technical Standards

The technical accessibility standards used to determine compliance with the federal ADA requirements within the built environment were:

- Americans with Disabilities Act Accessibility Guidelines (ADAAG)
- 2010 Standards for Accessible Design (2010 Standards)

The federal technical design standards changed on March 15, 2012 when the 2010 Standards took effect. Properties constructed or permitted before the effective date must comply with the ADAAG. Properties constructed, altered, or permitted after the effective date must comply with 2010 Standards. Elements that were constructed before the effective date are safe harbored from compliance with the new standards, if the constructed elements fully complied with the ADAAG at the time of construction. If those elements did not comply with the ADAAG, those elements must now comply with the 2010 Standards.

Several elements that were not previously scoped in the ADAAG now have technical requirements within the 2010 Standards. Those elements are not safe harbored by the ADA and must comply with the latest standards. The elements that are not safe harbored include dwelling units and recreation facilities such as playscapes/play areas, pools, amusement rides, boating facilities, fishing piers, golf and miniature golf, and exercise equipment.

Where dates of construction and alterations of the facilities included in the self-assessment could not be determined, the 2010 Standards were used as the technical standard for those self-assessments.

6.2 Self-Assessment and Field Survey Methodology

On-site assessments were coordinated with BREC staff. Altura provided the BREC Project Manager a schedule of facilities to be inspected. The Project Manager then notified staff at the facilities and parks to ensure that access was provided to all elements that needed to be assessed. A BREC staff member was available during the assessments to help ensure that access to facilities was provided.



In general, a two-person Altura Solutions field team was assigned to each facility in the project scope. The team consisted of two people that are familiar with the 2010 Standards well as Geographic Information Systems (GIS) data collection and have an architectural or engineering background. The team used tape measures and digital levels as measurement tools and an iPad to collect the GIS data. GIS protocols were established and finalized with BREC input, then the data was collected via a GIS collector application. The field team identified non-compliant elements at each facility, and a report was produced with the listing of non-compliant elements, element priority per violation, associated recommendations for compliance, and a budget of cost for the proposed alteration.

A GIS layer was also produced that maps the findings of the facility self-assessments. The hardcopy reports have a GIS identification number that ties back to the GIS point previously established by BREC. The information contained in the hardcopy reports is also available on the GIS map and within the GIS database.



Perkins Road Community Park



6.3 Self-Assessment Report Methodology

While conducting the field work, the data collection teams also documented recommended actions as possible solutions. Estimated budgets to alter non-compliant elements were developed with assistance from BREC. The recommended actions and budgets are presented in the self-assessment reports for the facilities assessed.

The reports will contain information as outlined below and demonstrated in the sample shown. All complete reports are included in Appendix 6.

Altura Solutions		BREC		2018 Parks and Recreation in East Baton Rouge Parish ADA Transition Plan								Brookfield Park	
REPORT ID	GIS ID	LOCATIONS	BARRIERS; CODES	VIOLATION	PRIORITY	RECOMMENDED ACTION	UNIT	QUANTITY	ESTIMATED COST	BUDGETED COST PER ITEM			
	1	3294	Exterior	Parking Lot; 208.2.4 Van Parking Spaces	Van accessible - Minimum number required, less than 1 for every 6 or fraction of 6 standard accessible parking spaces	1	Replace 1 standard accessible parking space with 1 van accessible parking space.	Number	1	\$2,100	\$2,100		
	2	3442	Play Area. Large	Play Ground; 1008.2.6 Ground Surfaces	Ground surface - Maintenance - Use levels, not maintained to compliant level	2	Maintain to compliant level.	Number	1	\$2,000	\$2,000		
	3	4932	Picnic Area	Table; 902.2 Clear Floor or Ground Space	Dining and work surfaces - Toe clearance, depth not between 17 and 25 inches	3	Replace with a compliant dining or work surface.	Number	1	\$500	\$500		
	4	5109	Exterior	Van Accessible Parking Space; 502.6 Identification	Van Accessible Marked Parking - Identification signs, missing	1	Provide identification sign.	Number	1	\$350	\$350		
Totals for Brookfield Park										1)	Estimated Cost	\$4,950	
Altura Solutions 4214 Medical Pkwy, Ste 201, Austin, TX 78756 (512) 410-7059 - www.alturalp.com										2)	Design Cost (8% of 1)	\$396	
										3)	Project Management (10% of 1)	\$495	
										4)	No Contingency Cost (Historic)	\$0	
										5)	Proposed Budget (1+2+3+4)	\$5,841	

Photographs

A photograph of the individual violation is typically provided. Where a photograph was not available, the cell was left blank. The image is intended to demonstrate the item that is in violation of the standards and the item’s location within its immediate surroundings. One image was included per non-compliant element in the report. However, the GIS database submitted to BREC may have more than one image per non-compliant element when multiple photos provided additional clarity.

Report ID Number

Each non-compliant element will have a unique number per facility report. The number will start at one for each facility and will only be unique within the facility.

GIS ID Number

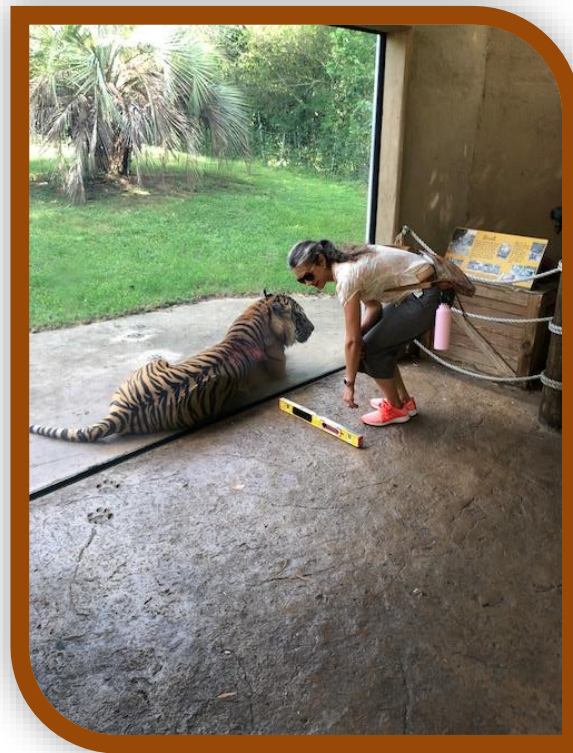
An individual GIS ID number was provided for each non-compliant element. This number will remain unique for the specific non-compliant element throughout the entire self-assessment process. This number is tied to the GIS database and can be used to access the point in the database where additional information can be found.

Locations

Each non-compliant element will have a general description of its location. Although the location is also available in the GIS map and database, a generic location will be provided to supplement the report. Location descriptions can include interior versus exterior or list a specific room, such as “Men’s Restroom”.

Barriers and Codes

Each non-compliant element will list a specific barrier. The barriers will include elements such as “ramp”, “drinking fountain” or “door”. Each non-compliant element will identify one specific 2010 Standards for Accessible Design code section that makes the element non-compliant. The code violations will include elements from the scoping section of the standards and from the technical standards section. Code heading examples are “208.2.4 Van Parking Spaces” and “403.3 Slope”. In some instances, there could be more than one barrier for the specific violation. However, in those situations, only one barrier was listed. Some non-compliant elements are in violation of more than one section. In these instances, only one code section was referenced.



Taking measurements at Baton Rouge Zoo

Violation

Each violation will be defined with a brief explanation of the non-compliant element. Examples of violations include “Reach range, not between 15 and 48 inches” and “Walking surface-Running slope greater than 1:20”. There are some instances where the element has more than one violation. In those situations, there may be one or more violations listed.

Priority

Each non-compliant element has an associated priority level. This level comes directly from the priority matrix established during the public and City staff open houses and the online survey. The priority levels reflect the importance of addressing the non-compliant elements within the facility. In instances where BREC decides to address specific violations within the facility and not the entire facility, the prioritization of each element can be used as a guide to address each violation.

Recommended Action

The proposed recommended actions present one possible solution to addressing the non-compliant element and should be used for planning purposes. Some of the recommended actions are generic in nature and may involve additional steps to achieve accessibility compliance. The recommended actions should not be interpreted as the only means to achieve compliance nor as a substitute for construction documents. In situations where the recommended action required more complex solutions such as moving walls or plumbing, compliance with other applicable codes was not considered.

A licensed professional designer should be consulted to develop the final solution for each identified deficiency. The design professional(s) should develop the required construction documents and ensure compliance with all applicable code requirements.

Unit

A type of unit is assigned to each violation. The types of units include “Number” for a specific number and “Linear Feet” for linear feet. Linear feet of accessible routes assumes a width of 5 feet.

Quantity

A quantity corresponding to the unit type is provided per violation. The quantity is a numeric value.

Estimated Cost

A corresponding cost per unit type and quantity is provided per violation. The unit cost is a numeric value. The unit costs have been established with input from BREC in an effort to establish unit costs that are reflective of the market conditions at the time of the report. The specific unit costs used are in Appendix 7.

Budgeted Cost Per Item

The total budget is the multiplication of the quantity and unit cost. The proposed estimated budgets should also be used for planning purposes and not as construction estimates. The budgets are generic in nature and are only intended to provide a scale of expected budget numbers to bring non-compliant elements into compliance.



Proposed Budget Table

At the end of every report, there is a Proposed Budget Totals table which includes the following lines:

- 1) Estimated Cost
- 2) Design Cost (8% of Line 1)
- 3) Project Management (10% of Line 1)
- 4) Contingency Cost (Historic) or No Contingency Cost (Historic)
- 5) Proposed Budget (Sum of Lines 1, 2, 3, and 4)

Line 5 includes the final Proposed Budget number which is used to calculate the total budget for the facility to come into compliance with ADA requirements.

6.4 Self-Assessment Findings

The findings of facilities show a pattern based on the age of the facility and any associated alterations. In general, facilities constructed before 1990 tend to have more non-compliant elements. As alterations occurred in these facilities, those specific elements were typically brought into compliance, while elements that have not been altered remain non-compliant. This is especially true of historically designated facilities. The findings were expected as these facilities pre-date the ADAAG.

Facilities constructed and/or altered after 1994 tend to be more compliant than facilities constructed pre-1990. However, there are still non-compliant elements. Some violations can be attributed to smaller alterations that were likely performed without consultation with a design professional. For example, the addition of fixed elements such as AED cabinets or flat-screen televisions become protruding objects for persons with visual impairments and are therefore non-compliant.

The information presented in this plan is based on the self-assessments conducted by Altura. Conditions are subject to change as scheduled alterations progress and routine maintenance continues.

"I appreciate all the diversity of the various parks; we use so many [different] parks depending on our interests for the day/month/age of our kids. I believe BREC is a great resource within our community."

Chapter 7 Proposed Method to Reach Program Accessibility

This plan presents a suggested method by which to achieve compliance with ADA Title II requirements for Program Accessibility. BREC can follow the proposed method and make adjustments to the schedule as circumstances dictate.

7.1 The Method to Reach Program Accessibility

The proposed method will address all non-compliant elements in facilities that currently host programs or have BREC staff housed within the facility. The projected budget for the method is approximately \$21 million without annual escalation. This approach will not require the relocation or replication of existing programs to a different facility. A total of 96 facilities are recommended to be altered and brought into compliance with the 2010 Standards. The details of the proposed budget are provided in Section 7.2. The specifics of which facilities are recommended to be altered by year for a 20-year timeframe can be found in Appendix 9.



Zachary Community Park

7.2 Budget

The recommended budget includes the associated costs with altering the 96 facilities as mentioned in Section 7.1. The budget also includes ADA related training for BREC staff.

The budget recommendation proposes the inclusion of annual ADA training for staff to ensure that BREC staff remain current on various ADA related topics. The recommendation includes website training to provide BREC staff with the ability to review the organization's website for compliance with the ADA requirements and maintain the website to the required standard.

ADA Training

The total estimated annual budget for ADA training is \$24,300. The proposed annual ADA training for BREC has four components. The first component is for five staff members to attend the National ADA Symposium at an average cost of \$2,000 per person. The symposium is held at different locations across the country each year and

the estimated cost includes attendance at the symposium as well as travel and lodging. The estimated budget for this component is \$10,000 annually.

A second component of the training is having a member of the US Access Board provide in-person training to BREC staff twice a year. The topics can be chosen by BREC for each session. The cost is limited to travel and lodging for US Access Board members as the Access Board does not charge for their time. The estimated budget is \$1,900 per training session. The estimated annual budget for this component is \$3,800.

A third component is to have 25 staff members participate in ADA webinars and local seminars annually. There are various webinar providers with an estimated cost of \$150 per person per webinar for an annual budget of \$3,750. The local seminar component calls for 15 staff members to attend local ADA seminars. The estimated budget is \$450 per person per seminar for an annual budget of \$6,750. The total proposed budget for this component is \$10,500.

A fourth component is website accessibility training. The plan recommends that BREC staff go through a website accessibility compliance training program. The training would consist of five Information Technology staff members attending. The cost is approximately \$14,370 per course which factors in registration per attendee, round trip flight, hotel stay, a per diem, and car rental. It is recommended that the training be attended the same year that the transition plan is adopted, five years after the plan is adopted, and 10 years after the plan is adopted. The total proposed budget for this component is \$43,110.

Below is a summary of the budgeted costs for the proposed training. These numbers should be used for planning purposes and not as final budgets. The numbers below represent budgets as of the date of this plan and do not include escalation.

Table 7.2.1 Proposed ADA Training Budget

Recommendation	Budget
Annual Training (over 20 years)	\$486,000
Website Training (\$14,370 x 3 courses)	43,110
TOTAL	\$529,110

The table below summarizes the proposed budget with a 3.5% annual escalation factor.

Table 7.2.2 Proposed Total Budget with escalation

Proposed Budget	Cost
Facility Budget	\$28,032,007
ADA Training	\$646,485
Website Training	\$50,445
TOTAL	\$28,728,937



7.3 Schedule

Per Section §35.150(c) Existing facilities:

“Time period for compliance. Where structural changes in facilities are undertaken to comply with the obligations established under this section, such changes shall be made within three years of the effective date of this part, but in any event as expeditiously as possible.”

Since the date of this plan has passed the effective date, it is recommended that corrective actions take place immediately and continue with a goal for completion within 20 years from the date of this plan.

While BREC has existing schedules to perform maintenance on a BREC-wide level, a specific ADA Maintenance Schedule should also be developed and added into the existing schedule. These ADA-specific projects should be merged with existing project priorities lists.

As required by ADA Title II, annual updates to this plan shall be generated by BREC, demonstrating the progress made that year, with a listing of projects undertaken, projects completed, and expenditures made to reach compliance. The annual updates are a federal requirement and are intended to be used internally as a means of tracking progress. Ensure the annual updates are readily available as proof of annual progress. The self-assessment reports for facilities and GIS layers should be amended as alterations are completed. The BREC-designated person responsible for plan implementation should verify that the alterations have been made in compliance with the applicable accessibility standards prior to altering any data within this plan.



Highland Road Community Park

As required by the ADA, the BREC Transition Plan should be made available for viewing by the general public for the duration of the alteration schedule and for a minimum of three years after plan completion.

Below are the first two years with escalation for the proposed schedule to reach program accessibility. The full 20-year proposed schedule for is provided in Appendix 9.

Schedule - Year 1

Facility Name	Budget
Church Street Park	\$69,691
Fortune Addition Pak	\$94,990
Louisiana/Claycut Bayou Park	\$109,174
Manchac Park	\$38,598
Maplewood Park	\$11,859
North 14 th Street Park	\$50,528
T.D. Bickham, Jr. Park	\$67,413
Woodlawn Acres Park	\$155,500
ADA Training	\$24,300
Website Training	\$14,370
TOTAL	\$636,423

Schedule - Year 2

Facility Name	Budget
Hartley/Vey at Gardere	\$55,594
Independence Community Park	\$615,816
Jackson Community Park	\$87,457
Milford Wampold Memorial Park	\$140,450
Zachary Community Park	\$337,054
Scotlandville Parkway	\$134,550
ADA Training	\$25,151
TOTAL	\$1,396,071

7.4 Prioritization

The prioritization process involved the consideration of factors with weighted averages for each factor. The factors utilized in the prioritization, in order of weighted value, with the heaviest weighted value listed first, are:

1. **Number of programs at a facility** - facilities that host a high number of total programs or services were given a 30% weighted value and scored according to the table below.

Number of Programs	Score
50 +	5
25-49	4
15-24	3
5-14	2
<5	1

2. **Unique programs** - facilities that host a unique activity that could not be relocated or replicated at another facility were given a 20% weighted value and scored according to the table below.

Unique Programs	Score
Yes	5
No	1

3. **Facility type** - the following facility types were given a 20% weighted value and scored according to the table below, in descending order: community parks, special use facilities, neighborhood parks, and golf facilities

Park Type	Score
Community	5
Special Use	4
Neighborhood	3
Golf	2

4. **Use of facility as an emergency shelter** - facilities that have been historically used as emergency shelters or staging areas were given a 10% weighted value and scored according to the table below.

Shelter	Score
Yes	5
No	1

5. **Use of facility as a polling place** - facilities that have been historically used as polling places were given a 10% weighted value and scored according to the table below.

Polling	Score
Yes	5
No	1

6. **The presence of a recreation center at a facility** - facilities that have a recreation center were given a 5% weighted value and scored according to the table below.

Rec Center	Score
Yes	5
No	1

7. **The housing of BREC staff at a facility** - facilities that have BREC staff housed or officed at a location were given a 5% weighted value and scored according to the table below.

Staff	Score
Yes	5
No	1

8. **Geographic distribution** - facilities that provide a program or service in close proximity to another facility that provided that same program were given lower priority
9. **Cost** - the cost to address the non-compliant elements within a facility was used to group facilities for alterations within a specific year.

A consideration that was not part of the final recommended priorities is the violations identified at each facility. The strategy in this plan is centered on addressing all non-compliant elements within a facility at the same time.

The element prioritization is used as a metric to understand the magnitude of the non-compliant elements. The element priorities can be used by BREC if it decides to address only specific violations within a facility instead of addressing all violations at the same time. For example, BREC can elect to focus on only the Priority 1 violations in certain facilities where there might be budgetary constraints.

The ranking of elements within a facility was developed by combining the recommendations in Title II of the ADA with input gathered from public forums and

online survey. The prioritized list serves to assist BREC in the decision making process if BREC decides to create projects based on element priorities instead of addressing an entire facility at a time.

The priorities were broken into three levels, with Priority 1 being the highest. These priority categories are used in the facility reports. Each individual facility has a report documenting non-compliant elements, the specific code section, an estimated budget to bring the element into compliance, and a priority ranking. A summary of the priorities with sample elements is provided in the table below.

Table 7.4 Priority of Elements within a Facility

	Sample Elements
Priority 1	<ul style="list-style-type: none"> · Routes from the public right-of-way · Parking · Restrooms · Special use spaces (auditorium, rock wall, skate park, etc.) · Entrances · Interior routes · Trails within a park
Priority 2	<ul style="list-style-type: none"> · Playscapes · Sport courts including assembly areas · Recreational Boating Facilities · Pools · Spas · Drinking fountains · Signage · Exercise Machines · Protruding Objects
Priority 3	<ul style="list-style-type: none"> · Reception/Concessions · Fitness equipment · Grills · Receptacles/Dispensers · Picnic tables/Dining areas/Work surfaces · Dressing, Fitting, Locker Room · Showers · Washing Machines/Clothes Dryers · Break Area · Baby Changing Table



7.5 Methods for Barrier Removal

The recommended method for removal of non-compliant elements involves leveraging multiple resources to facilitate compliance. Determining methods for barrier removal will involve a three-step process.

First, BREC will move forward with the proposed method to reach program accessibility while understanding that the plan can be modified, by BREC, to reflect changing programmatic needs to meet public demand. For example, the person responsible for implementation of the plan may move facilities on the proposed schedule due to factors not evaluated in this plan such as:

- ongoing renovation and construction projects
- scheduling of flood mitigation projects via external funding sources
- programs and service modifications such as cancelling and creation of new programs
- address public requests

Second, BREC can determine which elements can be addressed internally as maintenance items and which elements will require a designed solution. For elements that require a designed solution, a professionally licensed designer(s) should be contracted to develop a fully compliant design.

Third, a BREC policy is recommended to be implemented that clearly outlines the responsibility of the design professional. Currently, BREC does not review for 2010 Standards compliance. Instead, BREC relies on the design professional to design the project to be ADA compliant.

One suggestion of a type of policy is to leave the responsibility of compliance with the design professional. However, BREC should include a signature block for the lead designer to verify that the design complies with the 2010 Standards and/or require that a third-party accessibility consultant verify compliance with the requirements. Another



Harley-Vey Sports Park

suggestion is for BREC to take on the responsibility of reviewing construction documents and inspecting the final project for compliance with the 2010 Standards. This would involve the training of several staff members to develop proficiency with the 2010 Standards.

Finally, the Transition Plan should be kept up to date and reflect progress made to facilities and programs on an annual basis. This consists of the person responsible for plan implementation to:

- produce an annual update report showing progress and facilities alterations as well as implementation of programs and services (a sample is included in Appendix 5)
- provide consistent training
- update the GIS database regularly
- establish process to verify compliance of construction projects



Leeward Drive Park



Chapter 8: Resources

The US Department of Justice and the US Access Board provide ADA-related documents that can be downloaded through their respective websites.

U.S. Access Board Publications

The full texts of federal laws and regulations that provide the guidelines for the design of accessible facilities and programs are available from the U.S. Access Board. Single copies of publications are available at no cost and can be downloaded or ordered by completing a form available on the Access Board's website (<http://www.access-board.gov>). In addition to regular print, publications are available in: large print, CD-ROM, audio cassette, and Braille.

U.S. Department of Justice

The U.S. Department of Justice provides many free ADA materials including the Americans with Disability Act (ADA) text. Printed materials may be ordered by calling the ADA Information Line [(800) 514-0301 (Voice) or (800) 514-0383 (TTY)]. Publications are available in standard print as well as large print, audiotape, Braille, and CD-ROM for people with disabilities. Documents, including the following publications, can also be downloaded from the Department of Justice website (<http://www.ada.gov>).

In the Department of Justice's technical information publication, *Accessibility of Web Information and Services of State and Local Government Entities and Public Accommodations*, resources are listed to provide guidance for web developers designing accessible web pages (<https://www.ada.gov/websites2.htm>).

One resource is the Section 508 Standards, (<https://www.section508.gov/>) which federal agencies must follow for new web pages, and the other is the Web Content Accessibility Guidelines (WCAG) (<https://www.w3.org/TR/WCAG21/>) published by the World Wide Web Consortium (W3C) (<https://www.w3.org/>), and Web Accessibility Initiative (WAI) (<https://www.w3.org/WAI/>).



“From what I’ve seen, BREC does a fantastic job.”



Chapter 9: Appendices

- Appendix 1 List of Facilities
- Appendix 2 List of Facilities with Programs and Services
- Appendix 3 List of Scored Facilities
- Appendix 4 Analysis of Existing Policies and Procedures
- Appendix 5 Recommended Policies and Procedures
- Appendix 6 Facility Self Assessment Reports
- Appendix 7 Unit Cost Values
- Appendix 8 Total Budget
- Appendix 9 Proposed 20 Year Schedule and Annual Budget
- Appendix 10 Public Input Process
- Appendix 11 List of Planned BREC Projects for 2019

