



**Americans with Disabilities Act Self-Evaluation
Report of Selected Facilities and Policies:
City of Gardner, Kansas**

**This report provides a comprehensive review of the status of the accessibility of
selected City programs, services, and facilities and recommendations to move
Gardner toward full program accessibility**

DRAFT REPORT SUBMITTED SEPTEMBER 28, 2016 BY TPB ENTERPRISES, LLC

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SECTION I: INTRODUCTION AND OVERVIEW

EXECUTIVE SUMMARY

The City of Gardner (a.k.a. “the City”) has partnered with TPB Enterprises, LLC (a.k.a. “TPB”) to complete an Americans with Disabilities Act (ADA) Self-Evaluation of the City’s facilities, programs, activities, and services. The intent of the Self-Evaluation is to identify steps that must be taken to comply with the program accessibility requirements of Title II of the ADA.

The Gardner City Council created and appointed an ADA Advisory Committee on November 2, 2015 to act in an advocacy and advisory role to improve the access of citizens with disabilities to all government and community facilities and activities. As part of their duties, the Committee is embarking on a gap analysis to include an ADA Self-Evaluation and Transition Plan.

The Americans with Disabilities Act, enacted on July 26, 1990, provides comprehensive rights and protections to individuals with disabilities in the areas of employment, public accommodations, state and local government services, and telecommunications. The ADA prohibits all state and local governments and most private businesses from discriminating on the basis of disability.

The authors of this report have worked with the City of Gardner to

- Produce a Self-Evaluation of selected facilities, policies, and procedures in the City; and
- Provide recommendations to develop a Transition Plan to ensure program accessibility in Gardner facilities, programs, and activities.

The Self-Evaluation is provided in Sections III (*The Physical Accessibility Evaluation*) and IV (*The Program, Policy, and Services Evaluation*) of this report. These sections comprise the basis for the City to develop the required “*Transition Plan*”. This report clarifies recommendations for Transition Plan development; the City of Gardner should consider local factors (e.g. demographics, economic conditions, community input, etc.) in making final decisions on how to proceed with specific actions regarding removal of physical barriers, timelines, and related issues.

The City of Gardner’s Self-Evaluation is a public record, and the public should be invited to participate in the development of the document and subsequent Transition Planning. This report will stay on file with the City for a minimum of three years, preferably as a “living document”, and will guide decisions in policies, protocols, programs and construction.

Overall, the City has taken a number of steps over the past 10 years to improve accessibility of its facilities and programs. The City should focus initial efforts on updating its policies, enhancing access to its play areas, providing accessible routes to key spaces in outdoor environments, and ensuring equal access in its parking and restroom facilities. This report specifically details recommendations regarding what areas to address and priorities for action steps

THE GOAL: PROGRAM ACCESSIBILITY

The City of Gardner will utilize the Self-Evaluation report and process to develop a Transition Plan that results in improved program access for and inclusion of individuals with disabilities.

“PROGRAM ACCESSIBILITY: A public entity shall operate each service, program, or activity so that the service, program, or activity, when viewed in its entirety, is readily accessible to and usable by individuals with disabilities. This paragraph does not—

(1) Necessarily require a public entity to make each of its existing facilities accessible to and usable by individuals with disabilities;

(2) Require a public entity to take any action that would threaten or destroy the historic significance of an historic property; or

(3) Require a public entity to take any action that it can demonstrate would result in a fundamental alteration in the nature of a service, program, or activity or in undue financial and administrative burdens.”

The degree of program accessibility of a program is based on viewing each program “in its entirety”; this means that a city can achieve program accessibility in its services, programs and activities without removing every physical barrier present in existing facilities. For example, under the proper circumstances, a city that offers a public swimming program at 6 community pools may be able to demonstrate program accessibility without having a compliant pool lift at every location. Of course, the long term goal is full inclusion, complete elimination of all barriers is not required to demonstrate compliance with Title 2 of the ADA.

THE APPROACH: GOOD FAITH EFFORT

"Good faith effort" is an implied contractual term and it is defined as "what a reasonable person would determine is a diligent and honest effort under the same set of facts or circumstances." (Troutt v. City of Lawrence, 2008 U.S. Dist. LEXIS 61641). Title II entities, including the City of Gardner, are able to best show compliance with the ADA by demonstrating a good faith effort toward meeting its legal responsibilities. There are many factors taken into account when determining whether an entity has met the standard of good faith effort. Some factors which are most effective in showing compliance with this standard include:

- Ø The presence of a current Self-Evaluation and Transition Plan (based on review of existing conditions)
- Ø Record of past steps taken to remove barriers to program accessibility or otherwise enhance accessibility and inclusion of people with disabilities

- Ø The presence of written policies and procedures that are non-discriminatory and address the unique needs of people with disabilities
- Ø Staff training on disability etiquette, customer service, ADA requirements, and non-discriminatory organizational policies and procedures

PURPOSE OF THE SELF-EVALUATION

As stipulated in 28 CFR Part §35.105, all Title II entities were required to have completed Self-Evaluations by January 26, 1993. An ADA Facility Compliance Review (Self-Evaluation) was originally completed in 1993 by Devore & Associates Architects. This Self-Evaluation is being updated (as required by the amended ADA Title II Regulations), and the City will develop a Transition Plan. The City recognizes that this 2016 Self-Evaluation is the requisite initial step toward identifying current barriers for employees and all citizens with disabilities who use the City programs, services, activities and facilities. The goal of the Self-Evaluation and the resulting Transition Plan is removing those barriers, whether they are in a City facility, program, service, activity, policy, or governmental culture.

Program access allows a Title II entity – like City of Gardner – to find means of delivering their programs, services and activities without necessarily making every building fully accessible. This evaluation will work toward assessing all the programs, services and activities and facilitate an understanding of how physical access (or a lack of access) to City sites, facilities buildings, and elements impact and inform the level of services provided to the public.

The evaluation allows the elected leaders of the community, department heads, and employees to distinguish their individual and collective strengths, systemic weaknesses and other previously unrecognized barriers to accessibility. The Self-Evaluation creates a baseline for historical purposes, and chronicles the current conditions of the City.

The Self-Evaluation forms the cornerstone for accessibility decisions that are made when programs, services, activities and facilities are altered or created new. The Self-Evaluation is the foundation for providing fully accessible programs, services, activities and facilities for the City's future growth and direction.

The following are the regulatory requirements set forth in Title II regarding an entity's responsibilities in developing a Self-Evaluation:

“§ 35.105 Self-Evaluation.

(a) A public entity shall, within one year of the effective date of this part, evaluate its current services, policies, and practices, and the effects thereof, that do not or may not meet the requirements of this part and, to the extent modification of any such services, policies, and practices is required, the public entity shall proceed to make the necessary modifications.

(b) A public entity shall provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the Self-Evaluation process by submitting comments.

(c) A public entity that employs 50 or more persons shall, for at least three years following completion of the Self-Evaluation, maintain on file and make available for public inspection:

(1) A list of the interested persons consulted;

(2) A description of areas examined and any problems identified; and

(3) A description of any modifications made.

(d) If a public entity has already complied with the Self-Evaluation requirement of a regulation implementing section 504 of the Rehabilitation Act of 1973, then the requirements of this section shall apply only to those policies and practices that were not included in the previous self- evaluation.

SCOPE OF THE SELF-EVALUATION

1. City facilities are reviewed with the philosophy of full “Program Access” to any and all of the services and activities offered by the City, their agents or instrumentalities, by inter-local agreement, informal customs or unwritten policies. The scope of the Self-Evaluation requires a review of each of the programs, services, activities, policies and procedures presently being utilized or offered by City of Gardner, as well as a review of all buildings and sites owned, and possibly used by the City.

The Self-Evaluation scope of this report includes reviewing:

- All offered programs, services and activities.
- Policy and Personnel manuals
- City-wide informal and unwritten policies.
- City departments and their respective services and procedures.
- City facilities, buildings, and areas

The sites, facilities, buildings and areas included in the review are as follows:

- City Hall 120 E. Main St. 24,064 sq. ft.
- Police Building 440 E. Main St. 10,862 sq. ft.
- Municipal Airport Terminal Building & Maintenance Shop 31905 W. 175th St. 7,300 sq. ft.
- Gardner Electric Admin Building 1150 E. Santa Fe St. 5,110 sq. ft.
- Brookside Park (shelter and play equipment) 422 E. Washington St. 2.3 acres
- Celebration Park (2 shelters, play equipment and ballfields) 32701 W 159th St. 78.8 acres
 - Concessions/Restroom 1,628 sq. ft.
 - Park Baseball Concessions/Restroom 1,710 sq. ft.

- Cornerstone Park (2 shelters and play equipment) &
 - Aquatic Center 215 N. Center St. 5.17 acres
 - Aquatic Center Building 2,584 sq. ft.
 - Aquatic Center Bath House 3,153 sq. ft.
- Meadowbrook Park (2 shelters and play equipment) 311 W. Main St. 0.92 acres
- Stone Creek Park (shelter and play structure) 475 S. Stone Creek Dr. 10.2 acres
- Veterans Park (park shelter, play equipment, veterans memorial) 121 W. Pawnee Ln. 4.6 acres
 - Park Restroom Building 160 sq. ft.
- Westside Park (shelter, play equipment and ballfields) 321 Bedford St. 11.8 acres
 - Ball Park Concessions/Restroom 826 sq. ft.
- Winwood Park (shelter and equipment) 520 N. White Dr. 3.2 acres
- Municipal Airport Park (shelter & equipment) 31905 W. 175th St. unknown
- Gardner Lake Park (3 shelters and boat dock) 29807 W. 152nd St. 3.5 acres
- Gardner Junction Park 32500 US56 Hwy 1.4 acres
- Gardner Golf Course Club House 15820 S. Gardner Rd. 1,544 sq. ft.

Specific public facilities, trails and undeveloped parks and areas were not reviewed for accessibility. These include:

- Public Rights of Way
- All School associated parks
- Citywide Trail System
- All other facilities and elements not listed on the scope of work.

The City's public website (www.gardnerkansas.gov) was also reviewed for basic accessibility features and elements related to program accessibility, but a comprehensive accessibility and usability review of the website was beyond the scope of the work for the Self-Evaluation.

2. The ADA Coordinator solicited policies, procedures, and related documents from each department lead. These materials were reviewed for compliance and any follow-up information needs were solicited via email and phone. This evaluation also includes review of inter-local government agreements and landlord and informal customs and policies.

3. Program access often requires that buildings and facilities are also accessible, which compels the need for an architectural review of all City-owned buildings and sites, temporary events or leased properties used by the City. In order to establish a baseline for the architectural standards, the facility evaluations are performed using the 2010 Standards for Accessible Design (2010 Standards) guidelines, as promulgated by the Department of Justice (DOJ) and published on September 15, 2010. The DOJ standards are intended only for new or altered construction, and not for existing structures and sites. However, using the 2010 Standards is a best practice, and provides a starting point with a federally created document intended for purposes of accessibility, which is the accepted standard nationwide. By using the 2010 Standards for this review, the city will be able to utilize this report for any future

construction, alteration or addition as these projects must be designed and constructed using the 2010 Standards. <http://www.ada.gov/regs2010/2010ADAStandards/2010ADAstandards.htm>

THE TRANSITION PLAN

The United States Department of Justice emphasizes the importance of community involvement in implementing the findings of these reports.

“Develop a Transition Plan”

“If a town with 50 or more employees decides to make physical changes to achieve program access it must develop a written plan that identifies the modifications that will be made. The plan should include timelines for completing these modifications. Interested parties, including people with disabilities and organizations representing people with disabilities, must at a minimum have an opportunity to participate in the development of the plan by submitting comments. A copy of the plan and a copy of the Self-Evaluation must be available for public inspection for three years after completion.”

<http://www.ada.gov/smtown.htm>

Formation of an Ad-Hoc Accessibility Advisory Board is critical in making these decisions. The City Council created and appointed an ADA Advisory Committee on November 2, 2015 to act in an advocacy and advisory role to improve the access of citizens with disabilities to all government and community facilities and activities. As part of their duties, the Committee is embarking on a gap analysis to include an ADA Self-Evaluation and Transition Plan.

The concept of “Nothing About Us Without Us” should drive the processes and activities the City incorporates to make reasonable, informed, and effective decisions about accessibility moving forward from this report.

OVERVIEW OF RECOMMENDED ACTION STEPS

- 1) REVIEW SELF EVALUATION REPORT OF SELECTED FACILITIES AND POLICIES
- 2) POST DRAFT ON CITY WEBSITE FOR PUBLIC COMMENT
- 3) DOCUMENT INPUT FROM PUBLIC
- 4) ADOPT SELF-EVALUATION REPORT
- 5) ADOPT RECOMMENDED POLICY MODIFICATIONS (SECTIONS II AND IV) AND IMPLEMENT 2017
- 6) DEVELOP TRANSITION PLAN BASED ON NEED TO REMOVE BARRIERS TO PROVIDE PROGRAM ACCESSIBILITY (SECTION III)
 - a. INCORPORATE PUBLIC INPUT OBTAINED DURING COMMENT PERIOD
 - b. CONSIDER REPORT RECOMMENDATIONS IN CONJUNCTION WITH LOCAL CONDITIONS
- 7) FOLLOW UP:
 - a. DEMONSTRATE GOOD FAITH/BEST EFFORTS TO PROVIDE NON-DISCRIMINATORY FACILITIES, ACTIVITIES, PROGRAMS, AND SERVICES
 - b. COMPLETE SELF-EVALUATION OF FACILITIES AND PROGRAMS NOT ADDRESSED IN THIS REPORT
 - c. SCHEDULE TARGETED, ROLE-BASED TRAINING FOR CITY EMPLOYEES

SECTION II: TITLE II ADMINISTRATIVE REQUIREMENTS

In addition to the requirements to conduct a Self-Evaluation and develop a Transition Plan outlined above, the ADA sets forth three further administrative requirements for Title II entities with 50 or more employees. These include public notice, designation of an employee responsible for ADA compliance activities, and development of a grievance procedure.

PUBLIC NOTICE

The City must provide notice to the public about its ADA obligations and about its accessible facilities and services. The notice should inform the public about the ADA's nondiscrimination requirements and should also describe how the public or employees may contact specific officials about problems with accessibility and the need for effective communication. The information must be accessible to the public, including people who have disabilities that affect communication, such as blindness, low vision, deafness, and hearing loss. This requirement is outlined in the ADA regulatory language provided below:

§ 35.106 Notice

A public entity shall make available to applicants, participants, beneficiaries, and other interested persons information regarding the provisions of this part and its applicability to the services, programs, or activities of the public entity, and make such information available to them in such manner as the head of the entity finds necessary to apprise such persons of the protections against discrimination assured them by the Act and this part.

At this time, the City has drafted the following ADA Policy Statement:

NOTICE UNDER THE AMERICANS WITH DISABILITIES ACT

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 as amended ("ADA"), the City of Gardner, Kansas ("City") will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

Employment: The City of Gardner does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under Title I of the ADA.

Effective Communication: The City of Gardner will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in City of Gardner programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.

Modifications to Policies and Procedures: The City of Gardner will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services, and activities.

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of the City of Gardner, should contact the following as soon as possible, but no later than 48 hours before the scheduled event:

Jeanne Koontz ADA Coordinator/City Clerk 120 E. Main Street Gardner, KS 66030 (913) 856-0945 Email: cityclerk@gardnerkansas.gov

The ADA does not require the City of Gardner to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden.

Complaints that a program, service, or activity of the City of Gardner is not accessible to persons with disabilities should be directed to the ADA Coordinator listed above.

The City of Gardner shall not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications

Upon review, this policy includes the information recommended by the U.S. Department of Justice (DOJ) for ADA notices and highlights the City's nondiscrimination, effective communication, and reasonable modification policies. It also includes the contact information for the ADA Coordinator, a key component to an effective ADA public notice. At this time, no revisions to the language included in this policy are recommended.

Although no specific method is required to reach the public, it is recommended that notice be provided in more than one format and by using more than one type of media. At this time, the policy is posted prominently on the City's website at <http://www.gardnerkansas.gov/documents/ada-policies>. It is recommended that the City verify that the policy is also posted prominently in public offices. It is also important that this policy be provided in alternate formats such as large print, electronic file, or Braille, upon request.

RECOMMENDATIONS:

- Verify that ADA Public Notice is posted prominently in all offices and facilities open to the public.
- Train City employees and volunteers to respond to requests for alternate formats of the ADA Public Notice.

RESPONSIBLE EMPLOYEE

A public entity with 50 or more employees is required to designate at least one employee to coordinate ADA compliance. Although the ADA does not refer to this person as an "ADA Coordinator," this job title

is commonly used in state and local government and is the operative term in this document. The regulatory language relative to this requirement includes:

§ 35.107 Designation of responsible employee and adoption of grievance procedures

(a) Designation of responsible employee. A public entity that employs 50 or more persons shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under this part, including any investigation of any complaint communicated to it alleging its noncompliance with this part or alleging any actions that would be prohibited by this part. The public entity shall make available to all interested individuals the name, office address, and telephone number of the employee or employees designated pursuant to this paragraph.

The ADA Coordinator is responsible for managing the efforts of the government entity to comply with Title II and investigating any complaints that the entity has violated Title II. The name, office address, and telephone number of the ADA Coordinator must be provided to interested persons. The best practices approach is to publicize the name and role of the contact person or office on the city web-site and in any appropriate documents. Officials from other cities, counties and agencies with which City of Gardner has agreements should also be informed. Issues regarding complaints from the public under ADA Title II or from city employees under Title I should be channeled through the same office or individual.

The job description of the ADA Coordinator should reflect the intent of Title II regulations, which is to coordinate state or local government's efforts to comply with and fulfill its responsibilities under title II, including the investigation of complaints. The responsibilities of an ADA Coordinator should include:

- Conducting and/or maintaining a Self-Evaluation
- Conducting and/or maintaining a Transition Plan
- Establishing and overseeing grievance procedures
- Monitoring on-going progress of the Transition Plan
- Communicating policy within the organization and throughout the community
- Coordinating activities among a number of departments
- Identifying and utilizing appropriate resources
- Establishing a working knowledge of ADA regulations and guidelines
- Assisting in development of policies and procedures
- Coordinating ADA-related training for City employees and volunteers
- Working closely with the disability community and the disabilities advisory commission

The ADA Coordinator should be viewed as an administrative/management position rather than a technician, legal counsel, or regulatory specialist. Note that the above functions require a skill set similar to most management roles: a high level of administrative, organizational, and communication skills. Qualifications of an effective ADA Coordinator include:

- Familiarity with the state or local government's structure, activities, and employees
- Knowledge of the ADA and other laws addressing the rights of people with disabilities, such as section 504 of the rehabilitation act, 29 U.S.C. § 794
- Experience with people with a broad range of disabilities

- Knowledge of various alternative formats and alternative technologies that enable people with disabilities to communicate, participate, and perform tasks
- Ability to work cooperatively with the local government and people with disabilities
- Familiarity with any local disability advocacy groups or other disability groups
- Skills and training in negotiation and mediation
- Organizational and analytical skills

To better serve all citizens equally, the City has assigned the duties of the ADA Coordinator to the City Clerk, a position currently filled by Jeanne Koontz.

RECOMMENDATION:

- **Verify that the current ADA Coordinator has access to necessary training and resources needed to fulfill the requirements of the position.**

GRIEVANCE PROCEDURE

Title II also requires that cities have an ADA grievance procedure. A grievance procedure provides people who feel they have been discriminated against because of their disability, or others who feel they have been discriminated against because they have a friend or family member with a disability, with a formal process to make their complaint known to the City. This procedure encourages prompt and equitable resolution of the problem at the local level without having to force individuals to file a Federal complaint or a lawsuit. This requirement is outlined in the ADA regulations as such:

§ 35.107 Designation of responsible employee and adoption of grievance procedures

(b) Complaint procedure. A public entity that employs 50 or more persons shall adopt and publish grievance procedures providing for prompt and equitable resolution of complaints alleging any action that would be prohibited by this part."

The City's current ADA Grievance Procedure was reviewed as part of this Self-Evaluation. This policy can be found at <http://www.gardnerkansas.gov/home/showdocument?id=1452>. As it is currently drafted, the policy covers complaints related to alleged Title II disability discrimination while the City's Personnel Policy governs employment-related discrimination issues. The policy includes a clear outline of necessary steps for filing an ADA-related grievance and also includes designated timelines for filing and response. While grievances are required to be filed in writing with the ADA Coordinator, alternate methods are provided, upon request. The grievance process includes an investigation led by the ADA Coordinator and the option for reconsideration by the City Administrator.

RECOMMENDATIONS:

- **Revise policy to include language that "Reasonable modifications to the deadlines outlined in this policy may be made, upon request." This allows the City to modify the 30-day filing**

deadline in case of legitimate disability-related reasons and it also allows for some flexibility to the 15-day investigation timeline, when needed.

- Provide periodic training on an ongoing basis about the ADA Grievance Policy to all City employees and volunteers. This training ensures that all City representatives are able to access and discuss the policy, when necessary.

SECTION III: PHYSICAL ACCESSIBILITY EVALUATION

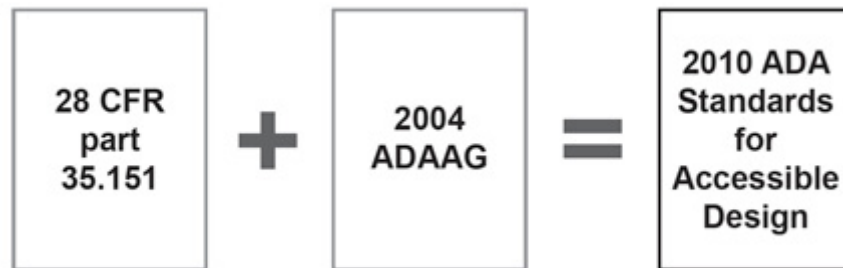
The Physical Accessibility Evaluation identifies areas that could be potential barriers to program accessibility for users based on the minimum standards established in the 2010 ADA Standards. **NOTE:** The facilities reviewed are existing facilities. The references to the ADA and related regulations are standards for new construction and alterations (See “Section V. A: Definitions”).

ACCESSIBLE DESIGN

Accessible Design is design focused on principles of extending standard design to people with one or more ability limitations to maximize the number of potential people who can readily use a product, building or service.

In the United States, the most common standard measure of accessible design is The 2010 Americans with Disabilities Act Standards for Accessible Design. The 2010 Standards are organized as a mix of regulatory standards excerpted from the updated Americans with Disabilities Act Title 2 Regulations and a building standard, the Americans with Disabilities Act Accessibility Guidelines (ADAAG).

State and local government facilities must follow the requirements of the 2010 Standards, including both the Title II regulations at 28 CFR 35.151; and the 2004 ADAAG at 36 CFR part 1191, appendices B and D.



In the few places where requirements between the two differ, the requirements of 28 CFR 35.151 prevail.

Adoption of the 2010 ADA Standards for Accessible Design The U.S. Department of Justice has adopted revised ADA design standards that include the relevant chapters of the Access Board's 2004 ADA/ABA Accessibility Guidelines as modified by specific provisions of this rule. To minimize compliance burdens

on entities subject to more than one legal standard, these design standards have been harmonized with the Federal standards implementing the Architectural Barriers Act and with the private sector model codes that are adopted by most States.

Effective Date The rule became effective March 15, 2011. On March 15, 2012, compliance with the 2010 Standards will be required for new construction and alterations and barrier removal. In the period between September 15, 2010 and March 15, 2012, covered entities may choose between the 1991 Standards and the 2010 Standards.

Element-by-Element Safe Harbor The rule includes a general "safe harbor" under which elements in covered facilities that were built or altered in compliance with the 1991 Standards would not be required to be brought into compliance with the 2010 Standards until the elements were subject to a planned alteration. A similar safe harbor applies to elements associated with the "path of travel" to an altered area.

The area-specific reports provide information about potential barriers to people with disabilities, ADAAG references, suggestions to address barriers, and an area for comments.

The facilities reviewed are existing facilities. The references to the 2010 Standards and ADAAG are standards for new construction. Area-specific reports identify elements and facilities that are covered by Safe Harbor provisions of the ADA.

RECOMMENDED PRIORITIES AND PLANNING LEVEL COST ESTIMATES

The tables below contain prioritized recommendations for physical barrier removal to ensure program accessibility throughout the City's programs and activities. Where needed, further guidance on approach to barrier removal is provided beneath the table.

Priorities were developed based on three factors:

- Ø Likelihood that steps will meet the standard of "easily accomplishable and able to be carried out without much difficulty or expense"
- Ø Priorities for barrier removal identified in U.S. § 36.304: *Removal of barriers*
- Ø Subjective assessment of which steps toward barrier removal will significantly impact the widest range of users with disabilities

Barriers are identified as being Priority 1, 2 or 3.

- Ø Priority 1 indicates the barrier is considered easy and relatively inexpensive to address, or is integral to compliance with ADA.
- Ø Priority 2 indicates the barrier should be assessed in relation to cost and overall effect on usability of the facility

- Ø Priority 3 indicates the barrier is unlikely to be addressed without significant cost and/or renovation, is technically infeasible, or (subjectively) is not likely to affect a significant number of people with varying abilities. However, priorities assigned are relative; just because an action is identified as Priority 3 does not mean that the action should not be considered as part of the City's good faith efforts to meet the standard of Program Access.

Recommendations have been prioritized to reflect a 3-year timetable to address physical barriers to program accessibility. In short, Priority 1 items are recommended to be addressed in Year 1 (2017), Priority 2 items are recommended to be addressed in Year 2 (2018), with remaining items to be prioritized and planned for Year 3 (2019).

Planning level cost estimate totals by year:

2017: Approximately \$81,500 (45,000 of the total addresses play area surfacing at Cornerstone Park)

2018: Approximately \$82,500 (42,500 of the total addresses play area surfacing at Veterans and Meadowbrook Parks)

2019: To be determined based on remaining barriers identified

The recommendations we have provided for timelines and budget allocations to address barriers are not binding in any way; it will be dependent upon the City to assess resources available and factor in local conditions to develop an effective Transition Plan. It is possible such conditions result in the city addressing barriers under either a more or less aggressive timetable.

A significant amount of cost is for playground surfacing. We have based our pricing on procuring and installing 2.5" thick surfacing. We recommend the City of Gardner contact several of the playground surfacing manufacturers direct to purchase this material in bulk quantities, which should result in substantially lower material costs. Installation is relatively simple, and city maintenance personnel can install it. We strongly recommend AGAINST procuring Engineered Wood Fiber based on the meticulous installation and maintenance procedures required to provide and maintain a compliant surface.

Square footage needs for play areas have been estimated as accurately as possible, with the intent of identifying likely minimum space requirements. These space need estimations do not necessarily (and usually do not) reflect the entire space currently delineated through boundaries and mulch location as the existing play area. We recommend speaking with playground surfacing manufacturers to identify exact surface needs in use zones, and options for accessible routes to ground level play components. Product providers can identify minimum requirements and may be able to develop strategies to maximize access while moderating costs.

We did not include any costs for items identified as "maintenance" in the schedule. We assume that those costs will involve hourly city staff time plus common maintenance materials.

Costs for signs and simple fixtures such as door hardware do not include hourly city staff time for installation. Prices to acquire fixtures and hire outside contractors to do the work can be provided, but will significantly increase costs related to compliance for the City.

Remodeling costs are offered based on historic cost information for similar project scopes completed by our professional developers. New construction costs are offered based on historic cost information for

similar projects. We have tried to be conservative with cost estimates; by shopping around and consulting playground surfacing professionals, Gardner may be able to address barriers for less than the amount indicated in these projections.

AQUATIC CENTER

PRIORITY 1		
Install compliant parking signage at 3 parking spaces at south side of parking lot.	<ul style="list-style-type: none"> • 3 parking signs • 1 van accessible sign • 3 posts 	\$60.00 \$20.00 \$90.00
Replace pool stairs.	<ul style="list-style-type: none"> • Pool stair OR pool transfer system OR pool lift 	\$2,500.00 – \$5,000.00
Firmly affix handrail in raised sundeck area.	<ul style="list-style-type: none"> • Maintenance 	
Replace drainage grates with models complying with 302.3.	<ul style="list-style-type: none"> • 2 grates approx. 24" X 24" 	\$250.00
Insulate exposed lavatory pipes in restrooms and locker rooms.	<ul style="list-style-type: none"> • Maintenance 	
Provide coat hooks within reach range in restrooms and locker rooms.	<ul style="list-style-type: none"> • Maintenance 	
Install door pulls meeting requirements of 404.2.7 on both sides of ambulatory stall doors in locker rooms.	<ul style="list-style-type: none"> • Maintenance • 2 door pulls 	\$30.00
PRIORITY 2		
Replace pool lift with model that is independently operable.	<ul style="list-style-type: none"> • Cost of pool lift and installation 	\$5,000.00
Install compliant spray hose in the one unisex shower that does not have one.	<ul style="list-style-type: none"> • 1 spray hose installed 	\$150.00
PRIORITY 3		
Adjust or replace hand metering faucet controls in locker rooms.	<ul style="list-style-type: none"> • 2 new automated faucets 	\$1,200.00
Replace 1 lavatory in each locker room with model that meets requirements of 606, including provision of knee and toe space.	<ul style="list-style-type: none"> • 2 new lavatories and installation 	\$3,000.00
Install compliant benches in locker rooms.	<ul style="list-style-type: none"> • 2 48" long compliant fixed benches 	\$1,000.00
Modify concrete approach to ramp structure to reduce slope to 1:12 maximum.	<ul style="list-style-type: none"> • Concrete ramp run approx. 30' 	\$1,350.00

Mitigate cross slopes in excess of 1:48 throughout ramp run.	<ul style="list-style-type: none"> Address when ramp is replaced. 	Included above
Replace/install concession counters with surfaces meeting requirements of 904.4.	<ul style="list-style-type: none"> Modify 1 service counter to provide lower surface 	\$1,200.00
Install lowered section of service counter to meet requirements of Work Surfaces 902.	<ul style="list-style-type: none"> Modify service counter to provide lower surface 	\$1,200.00
Mitigate slopes in in excess of 1:48 at accessible parking spaces and access aisles.	<ul style="list-style-type: none"> Resurfacing and leveling of 10 parking spaces/access aisles 	\$13,200.00

- Ø The Large Pool is fully compliant for accessible entry.
- Ø The Small Pool currently has a portable lift that is not independently usable. New construction standards call for two means of accessible entry, the first of which must be an independently operable pool lift that can be mounted to the deck as the primary means of entry (a sloped entry is not feasible). The second means of access can be a compliant lift, transfer stair, or transfer system.
- Ø Until counters are lowered, provide equivalent service at table or other location in service area to patrons with disabilities who are unable to use existing service counters.

BROOKSIDE PARK

PRIORITY 1		
Provide 1 signed van accessible parking space and access aisle connecting to route into park.	<ul style="list-style-type: none"> 1 parking sign 1 van accessible sign Marking of space and access aisle 	\$250.00
Replace/repair shelter concrete pad to eliminate gaps and ensure no slope greater than 1:48.	<ul style="list-style-type: none"> Maintenance 	
PRIORITY 2		
Provide accessible route to shelter.	<ul style="list-style-type: none"> Approx. 40' concrete/asphalt path (5' width) 	\$1,800.00
Provide accessible route from shelter to play areas.	<ul style="list-style-type: none"> Approx. 40' concrete/asphalt path (5' width) 	\$1,800.00
Install compliant handrails on bridge.	<ul style="list-style-type: none"> Approx. 50' handrail material on both sides of ramp (mounted to existing structure) 	\$3,000.00

PRIORITY 3		
Install compliant ground surfaces in play areas.	<ul style="list-style-type: none"> Approx. 1600' sq. ft. playground surface 	\$36,000.00

CELEBRATION PARK

PRIORITY 1		
Provide accessible route from parking to soccer fields.	<ul style="list-style-type: none"> Approx. 80' concrete/asphalt path (5' width) 	\$3,600.00
Provide accessible route from parking to football fields.	<ul style="list-style-type: none"> Approx. 120' concrete/asphalt path (5' width) 	\$5,400.00
Provide coat hooks within reach range in restrooms and locker rooms.	<ul style="list-style-type: none"> Maintenance 	
Insulate exposed pipes at lavatory in shelter women's restroom.	<ul style="list-style-type: none"> Maintenance 	
Relocate hand dryers in restrooms so they are not protruding objects.	<ul style="list-style-type: none"> Maintenance 	
Mitigate change in level at baseball field 3 from dugout to field.	<ul style="list-style-type: none"> Maintenance 	
Mitigate changes in level from dugout to field at baseball fields 5 & 6.	<ul style="list-style-type: none"> Maintenance 	
PRIORITY 2		
PRIORITY 3		
Install compliant ground surfaces in Baseball play area.	<ul style="list-style-type: none"> Approx. 1600 sq. ft. playground surface 	\$36,000.00
Install compliant ground surfaces in large shelter play area.	<ul style="list-style-type: none"> Approx. 8000 sq. ft. playground surface 	\$180,000.00
Install compliant ground surfaces in small shelter play area.	<ul style="list-style-type: none"> Approx. 3500 sq. ft. playground surface 	\$78,750.00
Provide accessible route to baseball fields 5 & 6.	<ul style="list-style-type: none"> Approx. 300' concrete/asphalt path (5' width) 	\$13,500.00
Install compliant ground surface at Kids Barn near shelter.	<ul style="list-style-type: none"> Approx. 300 sq. ft. playground surface 	\$6,750.00
Install compliant handrails on bridge.	<ul style="list-style-type: none"> Approx. 50' handrail material on both sides 	\$6,000.00

	of ramp (mounted to existing structure)	
Replace scorekeeper platforms at baseball fields.	<ul style="list-style-type: none"> Provide 4 ground level fixed work surfaces (tables/desks allowing for front approach and knee/toe clearance) 	\$5,600.00
Lower grab bars in restrooms from 37" to 33-36" above finish floor.	<ul style="list-style-type: none"> Maintenance 	
Replace drinking fountain with model that meets requirements of 602, including provision of knee and toe clearance.	<ul style="list-style-type: none"> Install 1 "hi-lo" drinking fountain unit 	\$1,950.00

- Ø Until access to Baseball Fields 5&6 is addressed, relocate baseball-related activities scheduled at those fields to Fields 1-4 if needed to ensure program accessibility.
- Ø Apply same policy to Soccer Fields after installation of recommended route

CORNERSTONE PARK

PRIORITY 1		
Provide signed accessible parking either in on-street area or through shared usage with Aquatic Center South parking spaces (see "Aquatic Center" Report).	<ul style="list-style-type: none"> See "Aquatic Center" report 	
Install compliant curb ramp leading from parking to accessible route through park	<ul style="list-style-type: none"> 1 curb ramp 	\$2,800.00
Provide accessible route to amphitheater seating and performance area.	<ul style="list-style-type: none"> Approx. 40' concrete/asphalt path (5' width) 8' deep X 12' long concrete/asphalt pad for seating area 	\$1,800.00 \$900.00
Install compliant ground surfaces in play area.	<ul style="list-style-type: none"> Approx. 2000 sq. ft. playground surface 	\$45,000.00
Repair gaps and changes in level on accessible paths and ground surfaces.	<ul style="list-style-type: none"> Maintenance 	
Relocate pet care bag dispenser to ensure element is on an	<ul style="list-style-type: none"> Maintenance 	

accessible route and within reach range.		
PRIORITY 3		
Install drinking fountain that meets requirements of 602 (for people who stand).	<ul style="list-style-type: none"> Install 1 "hi-lo" drinking fountain unit 	\$1,950.00
Provide accessible route to 2 nd amphitheater seating and performance area to disperse seating and provide choice in view.	<ul style="list-style-type: none"> Approx. 75' concrete/asphalt path (5' width) 	\$3,375.00
	<ul style="list-style-type: none"> 8' deep X 12' long concrete/asphalt pad for seating area 	\$900.00

GARNDER CITY HALL

PRIORITY 1		
At both inaccessible entrances, install directional signage indicating location of nearest accessible entrance (main entrance).	<ul style="list-style-type: none"> 2 directional signs 	\$50.00
Install "van accessible" sign at one parking space.	<ul style="list-style-type: none"> 1 van accessible sign 	\$20.00
Install compliant door pulls on exteriors of men's and women's toilet compartment doors.	<ul style="list-style-type: none"> 2 door pulls 	\$30.00
Raise accessible parking signs to minimum 60" height to bottom of sign(s), measured from ground surface of parking space they identify.	<ul style="list-style-type: none"> Maintenance 	
Securely fasten edges of mats to floor surfaces at entrance.	<ul style="list-style-type: none"> Maintenance 	
PRIORITY 2		
Renovate accessible route between accessible parking and main entrance.	<ul style="list-style-type: none"> Replace concrete sidewalk, run of approximately 20' of concrete (5' wide) 	\$2,000.00
Modify service counters to allow for parallel approach as identified in 904.4.1.	<ul style="list-style-type: none"> Modify 2 service counters to provide lower surface 	\$2,700.00
Install grab bars serving water closet in unisex restroom.	<ul style="list-style-type: none"> 1 36" grab bar 	\$75.00
	<ul style="list-style-type: none"> 1 42" grab bar 	\$80.00

PRIORITY 3		
Modify curb ramp to provide level landing at top per 406.4.	<ul style="list-style-type: none"> Reconstruction of curb ramp 	\$2,800.00
Install compliant ramp providing access to council seating area.	<ul style="list-style-type: none"> 8' ramp with handrails 	\$4,000.00
Renovate or relocate existing unisex restroom to meet requirements of Chapter 5.	<ul style="list-style-type: none"> Extensive renovation required 	Allow \$350.00 to \$400.00/SF
Mitigate cross slope on accessible route where exceeds 1:48.	<ul style="list-style-type: none"> Address when replacing/resurfacing 	TBD

- Ø Parking at rear of building is shared with library.
- Ø Until counters are lowered, provide equivalent service at table or other location in service area to patrons with disabilities who are unable to use existing service counters.

GARDNER ELECTRIC ADMINISTRATION BUILDING

PRIORITY 1		
Provide parking space and access aisle that provide a combined 16' width.	<ul style="list-style-type: none"> Repaint space and access aisle 	\$300.00
Install "van accessible" sign.	<ul style="list-style-type: none"> 1 van accessible sign 	\$20.00
Raise (post-mount) signs to minimum 60" height to bottom of sign(s), measured from ground surface of parking space they identify.	<ul style="list-style-type: none"> 1 post 	\$30.00
Securely fasten edges of mats to floor surfaces at entrance.	<ul style="list-style-type: none"> Maintenance 	
PRIORITY 2		
Install ramp with compliant level landing at entrance.	<ul style="list-style-type: none"> Approx. 12' ramp Level landings top and bottom 	\$2,000.00 Included above
Install signs identifying permanent rooms and spaces.	<ul style="list-style-type: none"> Approximately 5 compliant signs 	\$225.00
Replace rear wall grab bar with 36" grab bar	<ul style="list-style-type: none"> 36" grab bar 	\$75.00
PRIORITY 3		
Raise toilet seat to 17" minimum in women's restroom.	<ul style="list-style-type: none"> Replace seat with thicker model 	\$125.00

- Ø Women’s restroom off lobby should be offered to individuals with disabilities of any gender who require the use of a public restroom.

GARDNER GOLF COURSE CLUB HOUSE

PRIORITY 1		
Install 1 “van accessible” sign and replace 1 damaged accessible parking sign.	<ul style="list-style-type: none"> • 1 accessible parking sign • 1 van accessible sign 	\$20.00 \$20.00
Raise (post-mount) signs to minimum 60” height to bottom of sign(s), measured from ground surface of parking space they identify.	<ul style="list-style-type: none"> • 2 posts 	\$60.00
Repaint parking spaces and access aisles to clearly delineate accessible areas.	<ul style="list-style-type: none"> • Repaint spaces and access aisles 	\$300.00
Install compliant door pulls on exteriors of men’s and women’s toilet compartment doors.	<ul style="list-style-type: none"> • 2 door pulls 	\$30.00
Repair entrance door to provide door weight that is accessible to and usable by persons with disabilities.	<ul style="list-style-type: none"> • Maintenance 	
Fully insulate lavatory pipes in restrooms.	<ul style="list-style-type: none"> • Maintenance 	
PRIORITY 2		
Install accessible route to driving range, 1st tee, and other amenities OR Acquire Adapted Golf Cart	<ul style="list-style-type: none"> • Approx. 225’ concrete/asphalt path (5’ width) 	\$10,200.00 OR \$10,000.00
Replace rear grab bar with 36” grab bar.	<ul style="list-style-type: none"> • 36” grab bar 	\$75.00
Replace side wall grab bar with 42” grab bar.	<ul style="list-style-type: none"> • 42” grab bar 	\$80.00
When replaced, mount grab bars with top of gripping surface between 33-36” above finish floor.	<ul style="list-style-type: none"> • Maintenance 	

Reposition wall mounted dispensers in restrooms so they are not protruding objects.	<ul style="list-style-type: none"> Maintenance 	
PRIORITY 3		
Lower section of service counters to meet requirements of 904.4.	<ul style="list-style-type: none"> Modify counter 	\$1,200.00
If Adapted Golf Car not acquired in 2017, consider acquisition in 2018		See above

- Ø Until counters are lowered, provide equivalent service at table or other location in service area to patrons with disabilities who are unable to use existing service counters.
- Ø Acquisition of an adapted golf car ensures program access and allows accessible routes to be addressed at the time when future alterations (required to be accessible) are undertaken.

GARDNER JUNCTION PARK

PRIORITY 1		
Repaint parking space and access aisle.	Repaint space and aisle	\$300.00
Repair gaps in ground surfaces at some displays and route edges.	Maintenance	

GARDNER LAKE PARK

PRIORITY 1		
Provide accessible portable toilet room.	<ul style="list-style-type: none"> Purchase portable toilet room 	\$3500.00 plus cost of service maintenance
Install 1 "van accessible" sign and 1 accessible parking sign.	<ul style="list-style-type: none"> 1 accessible parking sign 	\$20.00
	<ul style="list-style-type: none"> 1 van accessible sign 	\$20.00
Post-mount signs 60" minimum height to bottom of sign(s), measured from ground surface of parking space they identify.	<ul style="list-style-type: none"> 1 post 	\$30.00
Provide accessible route to shelter closest to parking lot (below dam).	<ul style="list-style-type: none"> Approx. 25' concrete/asphalt path (5' width) 	\$1,125.00

Repair gaps larger than ½” present on boat dock and accessible route to boat dock.	<ul style="list-style-type: none"> • Maintenance 	
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MEADOWBROOK PARK

PRIORITY 1		
Provide 1 van accessible space and access aisle with signage and compliant ground surface.	<ul style="list-style-type: none"> • Concrete pad 320 sq. ft. for parking 	\$3,000.00
	<ul style="list-style-type: none"> • 1 accessible parking sign 	\$20.00
	<ul style="list-style-type: none"> • 1 van accessible parking sign 	\$20.00
	<ul style="list-style-type: none"> • 1 post 	\$30.00
PRIORITY 2		
Provide accessible route to play areas.	<ul style="list-style-type: none"> • Approx. 40’ concrete/asphalt path (5’ width) 	\$1,800.00
Provide accessible route to 1 shelter (currently connected to public sidewalk adjacent to park).	<ul style="list-style-type: none"> • Approx. 15’ concrete/asphalt path (5’ width) 	\$700.00
Install compliant ground surfaces in play areas.	<ul style="list-style-type: none"> • Approx. 500 sq. ft. playground surface at swings 	\$11,250.00
PRIORITY 3		
Install compliant ground surfaces in play areas.	<ul style="list-style-type: none"> • Approx. 1500 sq. ft. playground surface at play area 	\$33,750.00
Procure composite playground equipment that meets all 2010 Standards requirements, including size of transfer steps.	<ul style="list-style-type: none"> • Address when new play equipment is procured. 	TBD

MUNICIPAL AIRPORT TERMINAL BUILDING AND MAINTENANCE SHOP

PRIORITY 1		
Provide compliant accessible parking and “van accessible” signage at designated accessible parking space, mounted 60” minimum above surface of parking space.	<ul style="list-style-type: none"> • 1 accessible parking sign 	\$20.00
	<ul style="list-style-type: none"> • 1 van accessible sign 	\$20.00
	<ul style="list-style-type: none"> • 1 post (or wall mount) 	\$30.00

Provide sign identifying accessible entrance, incorporating International Symbol of Accessibility and complying with 216.6 and 703.	<ul style="list-style-type: none"> 1 sign 	\$20.00
Securely fasten edges of mats to floor surfaces at entrance.	<ul style="list-style-type: none"> Maintenance 	
Install ramp rising 6" (including level landings) to provide access to exterior toilet room.	<ul style="list-style-type: none"> 7-foot ramp with level landings top and bottom 	\$500.00
Install 36" rear wall grab bar at water closet in exterior restroom	<ul style="list-style-type: none"> 36" grab bar 	\$75.00
Install 42" side wall grab bar at water closet in exterior restroom.	<ul style="list-style-type: none"> 42" grab bar 	\$80.00
Lower mirror in exterior restroom so bottom of reflecting surface is no higher than 40" above finish floor.	<ul style="list-style-type: none"> Maintenance 	
Reposition wall mounted dispensers in restrooms so they are not protruding objects.	<ul style="list-style-type: none"> Maintenance 	
Relocate toilet paper dispenser underneath side grab bar 7-9" in front of water closet bowl leading edge.	<ul style="list-style-type: none"> Maintenance 	
Mount 1 coat hook in restroom no higher than 48" above finish floor.	<ul style="list-style-type: none"> Maintenance 	
PRIORITY 2		
Install signs identifying permanent rooms and spaces.	<ul style="list-style-type: none"> Approximately 2 compliant signs 	\$150.00
Replace round knobs on interior doors with lever-handled door hardware.	<ul style="list-style-type: none"> Approximately 4 lever handled door hardware 	\$820.00
PRIORITY 3		
Mitigate threshold at accessible entry.	<ul style="list-style-type: none"> Maintenance 	
Renovate or relocate interior toilet room to meet requirements of Chapter 6.	<ul style="list-style-type: none"> Extensive renovation required 	Allow \$300.00 to \$350.00/SF
Replace water closet with model that provides flusher on	<ul style="list-style-type: none"> Procure compliant toilet when remodeling or 	Included above

open side of water closet, or features automated flushing.	altering restroom interior.	
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MUNICIPAL AIRPORT PARK

PRIORITY 1		
Parking is shared with Airport; see "Municipal Airport Terminal Building and Maintenance Shop" report.		
PRIORITY 2		
Provide accessible routes to play areas, small basketball court, and 1 BBQ pit.	<ul style="list-style-type: none"> · Approximate total length of concrete route to connect areas: 120' (5' width) 	\$5,400.00
PRIORITY 3		
Install compliant ground surfaces in play area.	<ul style="list-style-type: none"> · Approx. 350 sq. ft. playground surface at climber 	\$8,000.00
	<ul style="list-style-type: none"> · Approx. 320 sq. ft. playground surface at swings 	\$7,200.00
	<ul style="list-style-type: none"> · Approx. 320 sq. ft. playground surface at toddler swings 	\$7,200.00

POLICE BUILDING

PRIORITY 1		
Identify which parking is for police vehicles and/or employees only.	<ul style="list-style-type: none"> · Approx. 5 reserved parking signs for employees and emergency vehicles 	\$100.00
	<ul style="list-style-type: none"> · 1-5 posts 	\$150.00
Provide 1 van accessible space with signs mounted 60" minimum above parking space surface.	<ul style="list-style-type: none"> · 1 van accessible sign 	\$20.00
	<ul style="list-style-type: none"> · Repaint space and access aisle 	\$300.00
	<ul style="list-style-type: none"> · Raise signs 	
PRIORITY 2		
Add handrail extension to bottom of ramp run.	<ul style="list-style-type: none"> · Add 36" shaped handrail/Metalwork 	\$350.00

Replace round knobs on interior doors with lever-handled door hardware.	<ul style="list-style-type: none"> Approximately 4 lever handled door hardware 	\$820.00
PRIORITY 3		
Construct accessible holding cell.	<ul style="list-style-type: none"> Extensive renovation required. 	Allow \$450.00-\$500.00/SF
Replace bench in holding cell with model that meets requirements of 903.	<ul style="list-style-type: none"> Compliant fixed bench 48" long 	\$600.00
Lower section of service counters to meet requirements of 904.4.	<ul style="list-style-type: none"> Modify counter 	\$1,200.00
Add/renovate toilet room to meet requirements of Chapter 6.	<ul style="list-style-type: none"> Extensive renovation required. 	Allow \$350.00-\$400.00/SF

Ø Until counters are lowered, provide equivalent service at table or other location in service area to patrons with disabilities who are unable to use existing service counters.

STONE CREEK PARK

PRIORITY 1		
Provide 1 van accessible on-street parking space with signage.	<ul style="list-style-type: none"> Parking sign Van accessible sign Paint space 	\$20.00 \$20.00 \$150.00
Provide curb ramp as part of accessible route from parking to path leading to park.	<ul style="list-style-type: none"> Install curb ramp 	\$2,800.00
Mitigate change in level between public sidewalk and route to park.	<ul style="list-style-type: none"> Maintenance Seal or bevel 	
PRIORITY 2		
Expand clear ground space at water fountain to ensure it is on accessible route.	<ul style="list-style-type: none"> 10 sq. ft. concrete or asphalt pad 	\$1,000.00
PRIORITY 3		
Add handrails and other features to create ramp at 30' run at entrance to park.	<ul style="list-style-type: none"> 30' compliant handrails on each side of ramp run, with 12" extensions at top and bottom Grading/leveling at top and bottom of ramp run 	\$3,600.00 Included above

	to provide compliant landings	
Install compliant ground surfaces in play area.	<ul style="list-style-type: none"> Approx. 1600 sq. ft. playground surface 	\$36,000.00

VETERANS PARK

PRIORITY 1		
Add accessible parking sign and van accessible sign, mounted 60" minimum above ground surface of parking space.	<ul style="list-style-type: none"> Parking sign Van accessible sign Post 	\$20.00 \$20.00 \$30.00
Fill/repair large gap opening in ground surface at accessible drinking fountain.	<ul style="list-style-type: none"> Maintenance 	
PRIORITY 2		
Install compliant ground surfaces in play areas.	<ul style="list-style-type: none"> Play Area 1 (with toddler swings): Approx. 1800 sq. ft. playground surface 	\$40,000.00
Provide end-of-row space for wheelchair adjacent to player seating bench at basketball court.	<ul style="list-style-type: none"> 25 sq. ft. concrete or asphalt pad 	\$250.00
PRIORITY 3		
Alter curb ramp to meet slope requirements.	<ul style="list-style-type: none"> Modify slope of curb ramp 	\$2,800.00
Install compliant ground surfaces in play areas.	<ul style="list-style-type: none"> Play Area 2: Approx. 2500 sq. ft. playground surface 	\$56,000.00

WESTSIDE PARK

PRIORITY 1		
Add two accessible parking spaces	<ul style="list-style-type: none"> 2 parking signs 2 posts Paint spaces/access aisles 	\$40.00 \$60.00 \$300.00
Add 4 accessible parking signs at existing parking spaces	<ul style="list-style-type: none"> 4 parking signs 1 van accessible sign 4 posts 	\$80.00 \$20.00 \$30.00

Provide accessible portable toilet room on an accessible route.	<ul style="list-style-type: none"> • Purchase portable toilet room 	\$3500.00 plus cost of service maintenance
Replace accessible route to shelter, including construction of 20' ramp run	<ul style="list-style-type: none"> • 20' ramp 	\$1,000.00
Mitigate 1" change in level on route to shelter.	<ul style="list-style-type: none"> • Maintenance 	
PRIORITY 2		
Provide accessible routes to play areas.	<ul style="list-style-type: none"> • Approx. 60' concrete/asphalt path (5' width) 	\$2,700.00
PRIORITY 3		
Install compliant ground surfaces in play areas.	<ul style="list-style-type: none"> • Swings: Approx. 800 sq. ft. playground surface 	\$18,000.00
	<ul style="list-style-type: none"> • Play Area: Approx. 1000 sq. ft. playground surface 	\$22,500.00
Provide accessible routes to areas of sport activity and concession area.	<ul style="list-style-type: none"> • Extensive resurfacing project throughout park. 	TBD; Allow \$5.00/SF
New construction of restroom facilities.	<ul style="list-style-type: none"> • New construction of building 	Allow \$400.00-\$450.00/SF

WINWOOD PARK

PRIORITY 1		
Provide 1 van accessible on-street parking space with signage.	<ul style="list-style-type: none"> • 1 Parking sign 	\$20.00
	<ul style="list-style-type: none"> • 1 Van accessible sign 	\$20.00
	<ul style="list-style-type: none"> • 1 post 	\$30.00
	<ul style="list-style-type: none"> • Paint space 	\$150.00
Provide curb ramp as part of accessible route from parking to path leading to park.	<ul style="list-style-type: none"> • Install curb ramp 	\$2,800.00
PRIORITY 3		
Install compliant ground surfaces in play area.	<ul style="list-style-type: none"> • Play Area 1: Approx. 6400 sq. ft. playground surface 	\$140,000.00
	<ul style="list-style-type: none"> • Play Area 2: Approx. 3600 sq. ft. playground surface 	\$80,000.00

FACILITY ASSESSMENT REPORT: AREA-SPECIFIC REPORTS

Linked below are area-specific reports for all facilities and elements addressed in the Self-Evaluation. The area-specific reports provide information about potential barriers to people with disabilities, detailed ADAAG references, suggestions to address barriers, and supplemental guidance. The area-specific reports also include a summary of play areas (where applicable) and photographic guidance.

- Aquatic Center - page 67
- Brookside Park - page 77
- Celebration Park - page 83
- Cornerstone Park - page 95
- Gardner City Hall - page 103
- Gardner Electric Administration Building - page 110
- Gardner Golf Course Club House - page 120
- Gardner Junction Park - page 128
- Gardner Lake Park - page 130
- Gardner Police Building - page 135
- Meadowbrook Park - page 141
- Municipal Airport Park - page 145
- Municipal Airport Terminal - page 149
- Stone Creek Park - page 157
- Veterans Park - page 161
- Westside Park - page 168
- Winwood Park - page 175

SECTION IV: PROGRAM, POLICY, AND SERVICES SELF-EVALUATION

The Program, Policy, and Services evaluation offers two basic areas of review and recommendations related to Title II compliance. The first section discusses several general areas of Title II requirements including effective communication, reasonable modification, separate benefit/integrated setting, and eligibility criteria. The second section includes recommendations for improving program access for the City's specific programs and services on a department-by-department basis.

The first section summarizes general findings and recommendations as they apply broadly to all the City departments. These recommendations should be incorporated into the City policies as a whole and can be tailored by each department to specifically fit their programs, services, and activities. The City does not specifically operate any programs or services devoted exclusively for persons with disabilities. More detailed recommendations for each department are found in the Departmental Overview and Review of Programs section immediately following this topic.

The City has several categories of interaction with the public in their delivery of services. All of the departments interact with citizens and others in person, on the telephone, or by serving them online. Some programs and departments are autonomous, creating regulations, policies, and documents to guide interactions with the public. Other departments must base their public interactions, in part, on their relationship to State or Federal programs, contractual agreements, resolutions, etc.

In general, the City can take several proactive steps within all their divisions that will enhance their level of accessible services. These include:

- The review, modification, creation or implementation of policies that reaffirm each department's commitment to providing accessible services, programs and activities.
- Ongoing ADA and disability etiquette/awareness training for staff.
- Crafting and posting permanent signage (in addition to the existing web-site notice) which outlines the City commitment for accessibility. Signage in each office, structure and Department should detail how a person with a disability can get assistance with any service, program, document, etc.

TITLE II REQUIREMENTS FOR PROGRAMS & SERVICES

Title II of the ADA prohibits Gardner from discriminating on the basis of disability in all the City's services, programs, and activities. Likewise, people with disabilities must have an equal opportunity to participate in and benefit from the City's services, programs, and activities. To accomplish this, the ADA sets requirements for communications with the public and policies and procedures governing town programs, services, and activities. These include provisions concerning denial of participation, integrated setting/separate programs, reasonable modification, effective communication, and relationships with outside vendors.

Denial of Participation

The ADA prohibits the City from denying services or benefits to otherwise qualified individuals because of disability. Instead, individuals with disabilities should have an equal opportunity to participate in or benefit from the many programs and services offered by the City. For example, an adult with diabetes

cannot be denied participation in the adult athletics program offered through the Parks & Recreation department because of his medical condition.

RECOMMENDATION:

- Verify that each department publishes a basic nondiscrimination/equal opportunity statement that includes disability as a protected class in all publications, forms, and documents.

Integrated Setting/Separate Programs

A primary goal of the ADA is the equal participation of individuals with disabilities in the "mainstream" of American society, including participation in their local communities. The major principles of mainstreaming including 1) integrating individuals with disabilities into programs and services to the maximum extent appropriate, 2) creating separate programs when necessary to ensure equal opportunity, and 3) allowing individuals with disabilities to participate in the regular program instead of a separate program when offered. For example, while the City offers a Special Olympics program, a young athlete with a disability should also be allowed to participate in the standard athletic program, as long as that person meets the program requirements.

Reasonable Modification

Title II requires the City and its departments to reasonably modify policies, practices, or procedures to avoid discrimination based upon disability. For example, the City's ADA Grievance Procedure discussed above requires individuals to submit ADA-related complaints in writing. However, as a reasonable modification to that policy, alternate means of submitting those complaints are also allowed on a case-by-case basis. Several recommendations for reasonable modifications to policies, practices, and procedures are discussed below with regards to specific City departments. However, some general modifications to City policies are offered below. Keep in mind, if the City can demonstrate that a requested modification would fundamentally alter the nature of its service, program, or activity, it is not required to make the modification.

As part of this Self-Evaluation, TPB reviewed the City's *Application for Reasonable Accommodation (Non-Employment Related)*. It appears that this form is used to solicit information about individuals' needs for modifications, auxiliary aids and services (see section below on Effective Communication), and other disability-related needs. It is important to keep in mind that the term "reasonable accommodation" is typically reserved for employment and education. In fact, the term is never used in Title II of the ADA regarding access to government programs, services, or facilities. Therefore, it is recommended that this form be updated with language relevant to the City's ADA compliance responsibilities.

RECOMMENDATIONS:

- Revise the *Application for Reasonable Accommodation (Non-Employment Related)* by updating the title to *Application for Disability-Related Modification* and substituting the word "modification" for "accommodation" throughout the form.
- Develop a statement and detailed guidance for all departments regarding "Reasonable Modifications of Policies" as discussed above. Currently, the review did not uncover any language in policies guiding decision making when the City considers whether to modify a policy for the public or employees of the City. The following language is one such example:

“The City of Gardner is committed to providing our programs, services and activities in an accessible and integrated manner. When City policies or procedures present an obstacle to that goal, the City will modify the policy to the maximum extent feasible without altering the fundamental nature of that program, service or activity. If you are in need of policy modifications identified with the ADA; or have suggestions, concerns or complaints, please contact the City ADA Coordinator.”

- Revise the City’s general “No Pets” policy in its facilities and programs to include a reasonable modification to allow access to individuals with disabilities using service animals. Under the ADA, a service animal is defined as a dog that has been individually trained to do work or perform tasks for an individual with a disability. The task(s) performed by the dog must be directly related to the person's disability.
- Provide training to City employees on the consistent administration of policies and reasonable modification.

Effective Communication

According to Title II, CFR §35.160 of the ADA, City of Gardner must “take appropriate steps to ensure that communication with applicants, participants and members of the public with disabilities are as effective as communication with others.” The City’s ADA Policy (see above) includes information about its commitment to effective communication.

In order to provide equal access, the City is required to make available appropriate auxiliary aids and services where necessary to ensure effective communication. Auxiliary aids and services may include qualified interpreters, video-remote interpreters (VRI), assistive listening devices, real-time captioning, text telephones (TTYs)/telecommunications devices for deaf persons (TDDs), videotext displays, readers, taped texts, Brailled materials, and large print materials.

When an auxiliary aid or service is required, the City must provide an opportunity for individuals with disabilities to request the auxiliary aids and services of their choice and must give primary consideration to the choice expressed by the individual. "Primary consideration" means that the public entity must honor the choice, unless it can demonstrate that another equally effective means of communication is available, or that use of the means chosen would result in a fundamental alteration in the service, program, or activity or in undue financial and administrative burdens. For example, if a resident requests a sign language interpreter for a City Council meeting, the interpreter should be provided, unless the City determines that captioning or another auxiliary aid or service is equally effective.

It is important to consult with the individual to determine the most appropriate auxiliary aid or service, because the individual with a disability is most familiar with his or her disability and is in the best position to determine what type of aid or service will be effective. Some individuals who were deaf at birth or who lost their hearing before acquiring language, for example, use sign language as their primary form of communication and may be uncomfortable or not proficient with written English, making use of a notepad an ineffective means of communication.

The City may not assess a surcharge to an individual with a disability for these services and this requirement is also outlined in the City’s ADA Policy. Keep in mind, the fees to the public at-large or

specific fees for an event or program may be increased to all participants to offset the costs of the auxiliary aids, services, interpreters, etc.

RECOMMENDATIONS:

- Include Effective Communication statement from the ADA Notice on the Communication Page of the City's website (<http://www.gardnerkansas.gov/documents/communication>)
- All City brochures, handbooks, handouts, application forms, examinations and other printed materials including - but not limited to - displays and presentations, information provided at booths and kiosks must be available in alternate formats, upon request. This applies to all departments. The City should consider identifying and retaining the contact information and a Memorandum of Understanding (MOU) with organizations that provide:
 - Sign-language interpreters
 - Video interpretation conferencing services
 - Real time captioning stenographers
 - Braille or large print
 - Audiotapes, CD's or other accessible formats
 - Assistive Listening devices
 - Call in/Speakerphone capability

While the City does not need to provide these materials in advance of a request, it should be poised to respond affirmatively and in a reasonable time frame to individual requests. Developing guidelines for what is a 'reasonable time frame' to expect the delivery of a city document in Braille or large print should be explored with vendors, decided, and put into print as part of City policies.

- Establish a procedure for all departments which outlines how an individual requests alternative formats and aids. If a person with vision loss desired an alternate written format – such as Braille or large print – protocols can instruct all staff how to proceed in a consistent manner. The means for alerting the public about the availability of the alternate formats and aids should be offered via various media including on the City's website, at each service counter, posted in offices, on recordings for automated telephone service, and by email.
- Adopt City-wide communication design standards that ensure that all communications including correspondence, brochures, newsletters, signage, etc. are uniform and include consistent accessibility features such as a sans serif font (e.g., Ariel or Calibri), space between characters, line spacing, indention, color contrast, etc.
- Install a TTY/TDD phone or the video equipment for Video Remote Interpreting (VRI). The City currently does not have any devices to effectively communicate with person who are deaf or hard of hearing (HOH) that rely on assistive technology while on the phone or when the person is not in a City building. TTY and TDD phone systems allow City staff to type their responses to a verbal conversation or to a relay operator. A TTY or a TDD should be installed – at a minimum – in the City Police Department and Court. The TTY or TDD should be on a dedicated landline, and contain a recording that provides the option for the caller to leave a message 24/7. All staff should be trained in the use and protocols for the phone.

PLEASE NOTE: VRI equipment allows individuals the ability to use their computer and web-camera and a remote sign language interpreter to communicate with City staff using a camera and screen. The VRI equipment may also offer a viable alternative to providing in-person sign language interpreters in certain situations. VRI interpreters can be located anywhere to assist on screen. VRI systems have also been effective providing digital access to City meetings or other public hearings.

Relationships with Outside Vendors/Procurement

Standard practice in public administration includes contractual, inter-local, and even informal agreements between the City and other government agencies. For example, the City often partners with Johnson County to provide programs and services to its citizens. The City must ensure that any partner organizations, public or private, are in compliance with the ADA so as to avoid compliance liabilities. The following recommendations for modifications of policies include statutory or contractual relationships that exist between the City and other agencies.

TPB also had the opportunity to review the Finance Department's *Purchasing Policy* (Revised September 2015). At this time, the policy does not include any language that indicates the City's commitment to purchasing products that meet ADA accessibility requirements or contracting for professional services providers that meet minimum ADA compliance standards.

RECOMMENDATIONS:

- Include information in all formal agreements with outside vendors, service providers, and other government agencies about the City's commitment to ADA compliance. Include a clause that acknowledges the partner's commitment to ADA compliance when partnering with the City to provide programs and services.
- Revise the *Purchasing Policy* to include language about the City's commitment to purchasing products that meet ADA accessibility requirements and contracting with outside vendors who meet minimum ADA compliance requirements.
- Given recent regulations related to other federal laws, the City may also want to consider giving preference in bid opportunities to companies owned and operated by individuals with disabilities and veterans with disabilities. More information about an example of this type of disability diversity supplier program can be found at <http://usbln.org/what-we-do/supplier-diversity/>.

In each relationship with other entities, the City has a concomitant level of responsibility to:

- Inform the other agencies or government officials of any known accessibility shortcomings within the policies, programs and facilities of those governments or agencies. This applies most readily when City of Gardner is acting as a tenant or when City of Gardner has no real authority over the conditions of the partners' sites, facilities, buildings, programs, services or activities, but may be aware of the shortcomings.
- Provide accessibility to the greatest extent feasible which corresponds with the City level of ownership, location of the service, nature or the arrangement, etc.
- Examine each of the contractual, inter-local, and informal and/or customary agreements to ensure that the City fully establishes which of the two parties is responsible for accessibility

under the ADA, and determine the appropriate distribution of that responsibility between parties.

Emergency Management

At this time, City personnel indicate that Gardner has adopted Johnson County's emergency management protocol. Many smaller municipalities have adopted a similar strategy for emergency management and disaster planning. In recent years, whole-community emergency management and inclusive disaster planning has dramatically increased in importance and visibility. Specifically, the U.S. Department of Justice has given much attention to this topic when enforcing the ADA within cities and towns. Given the vital importance of this topic, it is recommended that the City take several steps to ensure the needs of its residents and visitors with disabilities are addressed in its emergency management policies and procedures.

RECOMMENDATIONS:

- In partnership with Johnson County, review the emergency management plan to verify that the needs of individuals with disabilities in emergencies and disasters are acknowledged and addressed.
- Build relationships with local disability and emergency management organizations (e.g., Red Cross) to verify that the needs of individuals with disabilities are addressed in all disaster planning efforts.
- Each City facility should have a documented evacuation plan, as well as emergency procedures and practice drills or training with the staff. Develop policies that identify procedures for evacuating persons with disabilities. The evacuation plan and procedures should be developed and distributed to the general public.
- Establish protocols for employees, volunteers, and visitors to disclose the need for emergency preparedness assistance. Information about these protocols should be included in the City's security/registration process and at point of entry to each building and should be available in a variety of formats (e.g., large print, multiple languages). Messaging related to emergency preparedness should not solicit disclosure of disability directly, but should instead focus on the need for assistance. For example, communication can be as follows:

"It is the City's policy that, in an emergency, building occupants must be able to evacuate the premises independently in X time or less. Would you need assistance to do this and if so, what type of assistance would you need?"

DEPARTMENTAL REVIEWS

The City of Gardner offers a variety of essential programs and services that are fundamental to the public and to everyday community life. It is essential that individuals with disabilities have the opportunity to participate in these programs and services to the greatest extent possible.

The City has several categories of interaction with the public in their delivery of services. All of the departments interact with citizens and others in person, on the telephone, or by serving them online. Some programs and departments are autonomous, creating regulations, policies, and documents as the sole decision-maker when interacting with the public. Other departments must base their public

interactions, in part, on their relationship to State or Federal programs, contractual agreements, resolutions, etc.

Brochures, policies, programs and procedures, interaction with the public, and other details were reviewed to gain an understanding of the current status of the accessibility of these programs, services and activities. An overview of each department's programs and services is provided with appropriate recommendations.

City Clerk

The day-to-day duties of the City Clerk put the office in significant contact with the public across many venues. The Clerk's duties cover aspects of recording, reporting, employment, meetings with city leaders and interactions with many of the other city departments. The primary programs administered by the City Clerk include targeted Business Licensing, City Council Meetings, and Proclamations. The City Clerk also issues permits related to alcohol sales. At this time, City Elections and Voter Registration are coordinated by Johnson County, per Kansas statute. Because of the nature of these programs and services, it is important that the Clerk's office provide these services as equally and accessibly to individuals with disabilities.

RECOMMENDATIONS:

- Implement the City-wide Reasonable Modification Policy & Procedure discussed above.
- The Clerk's office should be prepared to provide all of their forms, applications, statements, receipts, handouts and brochures in an accessible manner. New steps are necessary, including being prepared to contact sign-language interpreters or the use of outside agencies for Braille or large print needs. TTY or TDD telephones should be placed in the City Hall and staff should be trained in their proper use.
- All printed documents should contain a statement of non-discrimination when possible, in particular the forms, brochures, handouts, etc. The following language is one such example:

"If you are in need of disability modifications or need alternate formats of any document please contact the City ADA Coordinator, City Clerk Jeanne Koontz."
- When identification is required, the Clerk's office should have a written policy describing the acceptable forms of official identification. Requiring a Driver's License has been considered discriminatory in past litigation, as some people with disabilities are not eligible for a Driver's License.
- All City Clerk staff should receive disability etiquette and awareness training for providing effective customer service to individuals with disabilities.
- All City Clerk staff should receive basic ADA training that addresses primary compliance responsibilities including nondiscrimination, equal opportunity, reasonable modification, effective communication, etc.
- All public meetings and board/commission/committee meetings should be held in areas and buildings which are architecturally accessible and should be advertised as such. The public should be informed of accessible meetings through a variety of channels including the City's website, appropriate service counters related to the public meeting, public and legal notices, recordings for voice mail and automated phone services, email, bulletins, brochures, handouts, and any other means being used.

- In her role as the City's ADA Coordinator, the City Clerk should coordinate and schedule ADA and disability related training for all City employees and volunteers. Since no disability-specific training has been conducted to date, the need for City-wide education is especially important.

Communications & Public Information

The City takes extensive measures to provide up-to-date and relevant information to the public and the media. This is done through the extensive use of newsletters, press releases, social media (Facebook, Twitter, and Instagram), and an email/text notification system, Textcaster.

The City's website was designed and is hosted by Vision Internet. Ongoing management of the site is done by this department, with various City departments sharing responsibility for ongoing content management. TPB conducted a cursory review of the website pertaining to the inclusion of disability related information and guidance and fundamental accessible design elements. Please note, a comprehensive WCAG2.0 website accessibility assessment was not completed at this time.

Given the primary purpose of these efforts, it is important that the City ensures that all communications are delivered in an accessible format for all members of the general public, including those with sensory disabilities like Deafness and blindness and those with information processing disabilities like learning disabilities. The following recommendations will help the City provide public information that benefits all individuals, regardless of disability.

RECOMMENDATIONS:

- The Department should provide all of their publications and newsletters in an accessible manner. This includes providing newsletters and other publications in accessible alternate formats, upon request.
- All printed and electronic documents should contain a statement of nondiscrimination, when possible. This statement should include information about requesting disability-related assistance when necessary.
- When posting information on social media sites, City representatives should utilize the accessibility features available through Facebook, Twitter, and Instagram. Information about accessibility features is available through all of these services.
- If the City creates, distributes or uses any type of multimedia such as videos, DVD's, movies or other similar content, the medium must be accessible. Movies, video, or other broadcasts made during training and conferences should follow the guidelines for accessible font, color, contrast, spacing, etc. as outlined in the Web Site analysis. An audio narration option should be available as well as verbal captioning, when necessary.
- Establish accessibility standards for communication similar to the City's standards for use of logo related branding components. Consider City-wide adoption of a font type with sans-serif characteristics (e.g., Ariel, Calibri) for all correspondence, brochures, signage, etc. All communication should include uniform and consistent accessibility features such as space between characters, line spacing, indentation, contrast, color, etc. in accordance with guidelines for accessible publication design.
- Verify that all publications are written at no higher than an 8th grade reading level.

- Increase the inclusion of disability-related graphics in both internal and external communications. Graphic design vendors have access to extensive databases of disability appropriate photos and graphics that will help the City with these efforts.
- Coordinate with Textcaster to ensure the service is accessible to individuals with a variety of disabilities. Provide all information sent out using the Textcaster system in alternate formats.
- Review the policies and procedures for the Citizen’s Survey and the contractual relationship with the ETC Institute to verify that measures are in place to include people with a wide range of disabilities in the survey process. Provide all reports of results in accessible formats.
- All staff should receive disability etiquette and awareness training for providing effective customer service to individuals with disabilities. Topics can include People First language and communicating effectively about disability related topics.
- All staff should receive basic ADA training that addresses primary compliance responsibilities including nondiscrimination, equal opportunity, reasonable modification, effective communication, etc.
- Complete a full accessibility and usability review of the City’s public website.

Human Resources

The Human Resources Department is charged with overseeing HR and risk management policies, procedures, and programs. These programs help the City recruit, develop, motivate, and retain qualified applicants and employees, including those with disabilities. HR specifically manages employee benefits programs, recruitment and talent acquisition activities, and personnel policies.

Employment with the City is guided by the *City of Gardner, KS Personnel Policies* (Revised October 19, 2015). This handbook describes expectations for employees as well as outlining policies, programs, and benefits available to eligible employees. TPB reviewed the City’s personnel policies with focus on issues related to ADA compliance.

HR-related recommendations are offered in two categories – 1) general ADA Title I-related recommendations and 2) recommended revisions to the *City of Gardner, KS Personnel Policies*.

GENERAL TITLE I RECOMMENDATIONS

- **Develop and implement a comprehensive reasonable accommodation policy and procedure.**

A major ADA Title I compliance issue for employers is providing a reasonable accommodation when a request is made and doing so in a manner that is seamlessly integrated into the organization with consistent policies and practices that make it fair and equitable to employees (and applicants) across departments.

The concern for the City is that there is currently no formal policy or process for providing accommodations to applicants and employees with disabilities and functional limitations. While the ADA does not require a formal policy/process, having a policy and process in place will benefit the City in many ways. First, if supervisors, managers, and personnel professionals have formal policies and procedures to refer to, they are more likely to handle accommodation requests properly and consistently. Second, a formal policy that is shared with employees helps employees know what to expect if they request an accommodation and also helps them

understand that other employees might be requesting and receiving accommodations. Finally, formal procedures help employers document their efforts to comply with the ADA.

A reasonable accommodation policy and process should include several key elements including a policy about the City's requirement to provide reasonable accommodations for individuals with disabilities during all stages of the employment process that outlines the steps for requesting and negotiating an accommodation; relevant forms for collecting information about the individual's needs, functional limitations, and employment-related barriers requiring accommodation, including medical documentation forms related to accommodation; and templates for correspondence required during the process. Developing a policy and process will also help the City clarify resource allocation including budgetary decisions related to covering the cost of accommodations and staffing issues. A formal process allows the City to monitor and track accommodation requests, provisions, and implementation.

The Equal Employment Opportunity Commission (EEOC) encourages employers to create a policy and process that treats accommodation requests uniformly. Once established, the policy should include: required training for employees on whom to approach with an accommodation request and how to do so; required training for managers and supervisors on how to respond to accommodation requests (the interactive process); and a record keeping system related to all accommodation requests and resolutions. Having a formalized reasonable accommodation process is important to successfully providing workplace supports for employees with disabilities. Lack of a clearly defined process and inconsistency in handling accommodation requests is time consuming, costly, and fosters resentment on the part of managers and employees/candidates with disabilities.

- **Develop equal opportunity statement and policy regarding volunteer positions within the City.**

Given the nature of City administration and government, many cities use volunteers to fill key roles within agencies and affiliated entities. For this reason, it is recommended that the City develop an equal opportunity policy and statement that pertains to volunteer positions within the City. Similar to the Equal Employment Opportunity policy and statement, this would specify that the City does not discriminate against volunteers based on any of the protected classes, including disability.

- **Review all City job descriptions to verify ADA compliance.**

Another key issue related to HR policy and compliance involves the review of physical and mental job qualification standards used by the City in job descriptions and related job postings. Given the compliance responsibilities under the ADA and the Rehabilitation Act, Section 504, the City is well advised to undertake a comprehensive review of current job descriptions to verify the descriptions are not screening out or tending to screen out or otherwise discriminate against qualified individuals with disabilities. When conducting this review, City administration should keep in mind that if job qualifications are disproportionately screening out applicants with disabilities, those qualifications must be job-related and of a business necessity. Implicit in this EEOC requirement is the City's obligation to evaluate adverse impact and not just review qualifications. The EEOC encourages employers to ask every applicant if s/he can perform the essential functions of the job with or without reasonable accommodation.

This type of review will impact three critical areas of hiring and employing people with disabilities: (1) determining if someone is a qualified individual with a disability; (2) determining if an accommodation request is reasonable, as it is not reasonable to eliminate an essential job function; and (3) assisting with performance management. Although not having essential job functions clearly delineated in job descriptions has not been seen as a big risk factor in the past, in light of the increased attention to this issue by Federal enforcement agencies, this issue should be taken seriously as a potential risk mitigation task moving forward.

Upon review of a sample job description for a *Senior Maintenance Worker – Streets/Line/Plant (Reviewed January 2016)*, it appears that the City’s current job descriptions include a list of essential duties and responsibilities. However, in this example, this section includes 37 job duties. HR research indicates that the average position includes 4-6 essential job functions. Therefore, it is recommended that the City revise job descriptions by grouping job tasks into major function areas. Further, it is advised to delineate tasks into essential and marginal job functions. Finally, all job descriptions should be reviewed to verify that no potentially biased language is used.

- **Implement the City-wide Reasonable Modification Policy & Procedure discussed above.**
- **HR should be prepared to provide all of their forms, applications, statements, receipts, handouts and brochures in an accessible manner.**
- **All printed HR documents should contain an EEO statement of non-discrimination when possible.**
- **All staff should receive disability etiquette and awareness training for providing effective customer service to individuals with disabilities.**
- **All staff should receive ADA-related training relevant to HR. Topics can include reasonable accommodations, disability disclosure and self-identification, effective recruitment strategies for hiring individuals with disabilities, etc.**
- **Proactively advertise job opportunities with disability organizations and other community partners that serve job seekers with disabilities.**

RECOMMENDED PERSONNEL POLICY REVISIONS

- **104.6 Complaint Procedure** – The procedure for lodging an HR-related complaint is separate and different than the City’s ADA Grievance Procedure discussed above. HR should coordinate with the City’s ADA Coordinator to determine which procedure will be used for employees with disabilities wishing to lodge an ADA-related complaint.
- **104.17 Personnel Records** – This section includes information about employees’ medical files that contain confidential medical information. Review this section to include information collected related to reasonable accommodation requests.
- **105.3 Drug Testing** – Verify that a procedure is in place to allow applicants and employees to disclose the use of medications that may potentially lead to a false positive test result. For example, some medications used to treat chronic health conditions that qualify as an ADA-protected disability present similarly to prohibited opiates on employment drug screen tests.
- **3-107 Background Reports** - Verify that background checks are performed post-offer, pre-employment. Some background check information may inadvertently reveal disability-related information so it is best to pull these reports after a conditional job offer has been made to avoid involuntary disability disclosure too early in the application process.

- **Section 6 – Leave Time** – Add a section related to leave as reasonable accommodation under the ADA. There may be certain situations when the City is required to grant additional unpaid leave that is separate and different from the other leave types already included in the personnel policy.

IT

The Information Technology Division provides technical support and data solutions to the City’s officials and staff through a broad variety of services. For purposes of this ADA Self-Evaluation, it is important to verify that these services are provided in a nondiscriminatory way for all individuals, regardless of disability. Further, this division is integral in the procurement of technology equipment and services that are accessible and usable by individuals with a broad range of functional limitations.

RECOMMENDATIONS:

- When purchasing technology equipment, ensure that the new equipment or systems provide the greatest level of accessibility. Document any research regarding the equipment’s accessibility prior to the purchase. Keep in mind - *While many manufacturers claim that their products are “ADA Certified” or some similar indication of approval, the Department of Justice and the US Access Board – enforcement and authors respectively of the ADA – do not grant any type of “Certification” or approval for any products.*
- Collaborate with the HR Department to provide accessible technology solutions for employees and applicants with disabilities, including assistive technologies, necessary as reasonable accommodations.
- Provide training on IT accessibility for all staff.

Risk Management

The Risk Management office, in collaboration with Human Resources, provides leadership and tools to assess and control risk in the workplace and comply with health and safety laws. Services include providing safety training for City employees and volunteers, providing other risk management-related training, managing Workers Compensation issues, and providing information and reports about risk management topics. In addition to the recommendations for all City departments regarding reasonable modification of policy and procedure, effective communication, and nondiscrimination, it is important that the Risk Management office keep the following recommendations in mind in the provision of services:

RECOMMENDATIONS:

- Review existing training content available and verify that this content is accessible to users with disabilities who may be accessing the information using assistive technology such as screen reading software.
- When advertising training opportunities, include language that notifies participants that reasonable accommodations and auxiliary aids and services are available, upon request. An example of this information includes:

“Risk management is committed to providing equal training opportunity to our employees and volunteers. If you need a reasonable accommodation or other service to participate in this training, please contact our office.”

- Provide education and guidance to all training facilitators on accommodating training needs of adult learners, including learners with disabilities.
- All staff should receive disability etiquette and awareness training for effectively interacting with individuals with disabilities.
- All staff should receive basic ADA training that addresses primary compliance responsibilities including nondiscrimination, equal opportunity, reasonable modification, effective communication, etc.
- Provide all risk management related information, publications, and materials in an accessible format. Upon request, provide these materials in accessible alternate formats such as large print, electronic file, or Braille.

Finance

The Finance Department is responsible for financial planning, maintaining all financial records, safekeeping of funds, purchasing, payroll, investments, collections, post issuance debt compliance, grant coordination and reporting and budget analysis. Services provided by the Finance Department include management of Utility Billing and oversight of the Municipal Court. In addition to the City-wide recommendations to improve compliance discussed above, the department should also keep the following recommendations in mind.

RECOMMENDATIONS:

- Implement the City-wide Reasonable Modification Policy & Procedure discussed above. For example, the Municipal Court procedures indicate that no food or drink is allowed. However, it may be necessary to reasonably modify this policy to allow an individual to bring a bottle of water into the courthouse if medically necessary because of a disability.
- The Finance Department should be prepared to provide all of their forms, applications, statements, receipts, handouts and brochures in an accessible manner. This includes utility bills and billing information. New steps are necessary, including being prepared to contact sign-language interpreters or the use of outside agencies for Braille or large print needs. TTY or TDD telephones should be placed in the City Hall and staff should be trained in their proper use.
- All printed documents should contain a statement of non-discrimination when possible, in particular the forms, brochures, handouts, etc. The following language is one such example:

“If you are in need of disability modifications or need alternate formats of any document please contact the City ADA Coordinator, City Clerk Jeanne Koontz.”
- When identification is required, the department should have a written policy describing the acceptable forms of official identification. Requiring a Driver’s License has been considered discriminatory in past litigation, as some people with disabilities are not eligible for a Driver’s License.
- Verify that the online Utility Billing and Municipal Court payment systems are accessible to and usable by individuals using assistive technologies like screen reading software.

- All staff should receive disability etiquette and awareness training for providing effective customer service to individuals with disabilities.
- All staff should receive basic ADA training that addresses primary compliance responsibilities including nondiscrimination, equal opportunity, reasonable modification, effective communication, etc.

Municipal Airport

The City owns and operates the Gardner Municipal Airport, K34. The airport offers a variety of support services for aircraft including aircraft parking and tie-downs, hangars, aircraft maintenance, 24-hour self-service fuel, glider towing, flight instruction, and aircraft rental. The operation of the Airport is guided by the *Gardner Municipal Airport Minimum Standards*. As with other City programs and services, the Airport is required to provide these services to individuals with disabilities in an equitable manner. In addition to ensuring that the airport facilities are accessible to the greatest extent possible, it is also important for the Airport Advisory Board and staff to be aware of strategies for providing overall access to programs and services for people with disabilities.

RECOMMENDATIONS:

- Implement the City-wide Reasonable Modification Policy & Procedure discussed above.
- The Airport should be prepared to provide all of their forms, applications, statements, receipts, handouts, the Airport newsletter, and brochures in an accessible manner, including the provision of alternate formats.
- All printed documents should contain a statement of non-discrimination when possible, in particular the forms, brochures, handouts, etc. The following language is one such example:

“If you are in need of disability modifications or need alternate formats of any document please contact the City ADA Coordinator, City Clerk Jeanne Koontz.”
- When identification is required, the Airport should have a written policy describing the acceptable forms of official identification. Requiring a Driver’s License has been considered discriminatory in past litigation, as some people with disabilities are not eligible for a Driver’s License. Obviously, any valid licenses required for the operation of aircraft are still required of pilots with disabilities.
- Revise the *GMA Minimum Standards* to reflect ADA-specific requirements:
 - Modify Rule 1-16 prohibiting no pets on airport premises to allow access for handlers of service animals, as defined by the ADA.
 - Modify Rule 5-1 to include disability as a protected class.
- All staff should receive disability etiquette and awareness training for providing effective customer service to individuals with disabilities.
- All staff should receive basic ADA training that addresses primary compliance responsibilities including nondiscrimination, equal opportunity, reasonable modification, effective communication, etc.

Business & Economic Development Services - Building & Inspections

The Building and Inspection Division is responsible for reviewing construction plans, issuing building permits, conducting field inspections, monitoring contractor licensing, investigating land use complaints,

and assisting the public with general home renovation questions. Services include enforcement of the adopted building and safety codes, providing information about the building and safety codes and building and sign permits, issuing licenses for massage therapists, providing development reports, and issuing burn permits and fire code inspections (in collaboration with Johnson County). As per the ADA, local building departments are not responsible for enforcement of the ADA Standards for Accessible Design. However, the City of Gardner has adopted the International Building Code and is responsible for its implementation and enforcement at the community level. The Building and Inspection Division proactively monitors accessibility of new construction and alterations when reviewing plans, issuing permits, and conducting inspections.

RECOMMENDATIONS:

- Implement the City-wide Reasonable Modification Policy & Procedure discussed above.
- The division should be prepared to provide all of their forms, applications, statements, receipts, handouts and brochures in an accessible manner.
- All printed documents should contain a statement of non-discrimination when possible and should include a version of the following language:
 - “If you are in need of disability modifications or need alternate formats of any document please contact the City ADA Coordinator, City Clerk Jeanne Koontz.”
- When identification is required, the division should have a written policy describing the acceptable forms of official identification. Requiring a Driver’s License has been considered discriminatory in past litigation, as some people with disabilities are not eligible for a Driver’s License.
- All division staff should receive disability etiquette and awareness training for providing effective customer service to individuals with disabilities.
- All division staff should receive basic ADA training that addresses primary compliance responsibilities including nondiscrimination, equal opportunity, reasonable modification, effective communication, etc.
- All division staff should receive basic training related to the ADA Standards for Accessible Design and home modifications to increase accessibility.

Utilities

The City provides utility services, including electric, water, and wastewater, to its residents. The Utilities Department is responsible for the construction, operation, maintenance, and repair of the City’s utility infrastructure. Because of the nature of these services, department employees interact with customers on a regular basis.

RECOMMENDATIONS:

- Implement the City-wide Reasonable Modification Policy & Procedure discussed above.
- The department should be prepared to provide all of their forms, applications, statements, receipts, handouts and brochures in an accessible manner.
- All printed documents should contain a statement of non-discrimination when possible and should include a version of the following language:

“If you are in need of disability modifications or need alternate formats of any document please contact the City ADA Coordinator, City Clerk Jeanne Koontz.”

- When identification is required, the department should have a written policy describing the acceptable forms of official identification. Requiring a Driver’s License has been considered discriminatory in past litigation, as some people with disabilities are not eligible for a Driver’s License.
- All staff should receive disability etiquette and awareness training for providing effective customer service to individuals with disabilities.
- All staff should receive basic ADA training that addresses primary compliance responsibilities including nondiscrimination, equal opportunity, reasonable modification, effective communication, etc.

Public Works

The Public Works Department consists of two divisions, Operations and Engineering. The department manages and maintains city engineering, public rights-of-way, streets, traffic signs and signals, storm water, fleet maintenance, and city building maintenance.

Other responsibilities of the Public Works Department include planning, designing, and constructing elements of the City's infrastructure; managing the City's environmental programs; operation and maintenance of the City's storm water systems, streets, and traffic control network; maintenance of the City's fleet of vehicles and equipment; and upkeep of City buildings and facilities.

It is important to keep in mind that the City must maintain in working order equipment and features of facilities that are required to provide ready access to individuals with disabilities. Isolated or temporary interruptions in access due to maintenance and repair of accessible features are not prohibited. Given its role in the upkeep of City buildings and facilities, Public Works plays an important role in the maintenance of these accessible features. Obviously, mechanical failures in equipment such as elevators or automatic doors will occur from time to time. The obligation to ensure that facilities are readily accessible to and usable by individuals with disabilities would be violated if repairs are not made promptly or if improper or inadequate maintenance causes repeated and persistent failures.

RECOMMENDATIONS:

- Implement the City-wide Reasonable Modification Policy & Procedure discussed above.
- Review the department’s policy on the maintenance of accessible features of City buildings and facilities to ensure that adequate protocols are in place to meet ADA requirements.
- The department should be prepared to provide all of their forms, applications, statements, receipts, handouts and brochures in an accessible manner.
- All printed documents should contain a statement of non-discrimination when possible and should include a version of the following language:

“If you are in need of disability modifications or need alternate formats of any document please contact the City ADA Coordinator, City Clerk Jeanne Koontz.”

- When identification is required, the department should have a written policy describing the acceptable forms of official identification. Requiring a Driver’s License has been considered discriminatory in past litigation, as some people with disabilities are not eligible for a Driver’s License.

- All staff should receive disability etiquette and awareness training for providing effective customer service to individuals with disabilities.
- All staff should receive basic ADA training that addresses primary compliance responsibilities including nondiscrimination, equal opportunity, reasonable modification, effective communication, etc.
- All staff should receive basic training related to the ADA Standards for Accessible Design, public rights of way, and other relevant topics.

Boards, Commissions, and Committees

The City has several standing boards, commissions, and committees that assist with public administration. Some of these groups include the Planning Commission, Parks & Recreation Advisory Committee, and Airport Advisory Board. Each group is charged with a different mission, depending on their affiliation with the City and their purpose.

RECOMMENDATIONS:

- Implement the City-wide Reasonable Modification Policy & Procedure discussed above.
- All boards, commissions, and committees should be prepared to provide reports, meeting minutes, and other generated correspondence in an accessible format.
- All members should receive disability etiquette and awareness training for effectively interacting with individuals with disabilities.
- All members should receive basic ADA training that addresses primary compliance responsibilities including nondiscrimination, equal opportunity, reasonable modification, effective communication, etc. This training will help encourage decision-making that takes into consideration the City's ADA compliance responsibilities.
- All public meetings and board/commission/committee meetings should be held in areas and buildings which are architecturally accessible and should be advertised as such. The public should be informed of accessible meetings through a variety of channels including the City's website, appropriate service counters related to the public meeting, public and legal notices, recordings for voice mail and automated phone services, email, bulletins, brochures, handouts, and any other means being used.
- The City should actively recruit eligible individuals with disabilities to serve on boards, commissions, and committees. The City should add an equal opportunity statement to the public website page about openings (<http://www.gardnerkansas.gov/government/boards-commissions-and-committees/boards-commissions-and-committee-openings>). All openings should be shared with disability organizations in the community.

Parks & Recreation

The Parks & Recreation department offers a variety of programs and services designed to “entertain, educate, and exercise the minds and bodies” of Gardner residents including athletic programs, instructional classes, special events, and parks. Much of the programming involves the use of volunteers.

Parks, recreation, and sports are critically important in Gardner, and equally so to persons with disabilities. Beyond the simple fun of participation, persons with disabilities, especially children with

disabilities, are given exceptional opportunities for socialization and development often not available in other areas of their lives. The benefits of involvement with recreational activities like those offered by the Parks & Recreation Department also include increased quality of life and health improvements. Therefore, ensuring that Parks & Recreation programs and services are accessible to individuals with disabilities is especially important for increasing community participation. The recommendations provided below focus on providing equal access to these programs and services for individuals with a wide variety of disabilities. For a full discussion of the physical accessibility of Parks & Recreation facilities, including parks, see Section III of this report.

Also keep in mind that the City has ADA compliance responsibilities for temporary services, programs, events, and activities. Facilities and structures that are built or altered for temporary use must comply with the ADA Standards for Accessible Design (see Section III for more details). In addition, the policies and operations for the event must meet the nondiscrimination requirements of the ADA. When planning temporary events such as Movies & Music in the Park, the Halloween Boo Bash, or the July 4th Celebration, to name a few, the City should review ADA title II requirements the ADA Standards. The Standards can provide guidance to help event planners place temporary accessible parking spaces in appropriate locations, provide an accessible route throughout the site, and provide other accessible features for food service, toilet facilities (including accessible portable toilets), assembly area seating, public telephones, etc., where such elements or facilities are provided for the public. It is very important to consider accessibility requirements when the event is in the planning stage so that accessible facilities can be identified and incorporated in a manner that does not require extensive construction or last-minute modifications. Effective communication requirements also apply to temporary events. It may be necessary to provide qualified sign language interpreters or other auxiliary aids and services as requested, such as print material in a large-print format or electronically. The City may choose when to provide interpreters and publicize a schedule for interpreters and other auxiliary aids and services. It should also provide auxiliary aids or services in response to individual requests, unless doing so would result in undue financial and administrative burdens. Promotional material for all temporary events should explain how the public can request a particular auxiliary aid or service and be informed of when specific auxiliary aids and services may be available.

RECOMMENDATIONS:

- Implement the City-wide Reasonable Modification Policy & Procedure discussed above.
- The department should be prepared to provide all of their forms, applications, statements, receipts, handouts and brochures in an accessible manner.
- All printed documents should contain a statement of non-discrimination when possible and should include a version of the following language:

“If you are in need of disability modifications or need alternate formats of any document please contact the City ADA Coordinator, City Clerk Jeanne Koontz.”
- When identification is required, the department should have a written policy describing the acceptable forms of official identification. Requiring a Driver’s License has been considered discriminatory in past litigation, as some people with disabilities are not eligible for a Driver’s License.

- All staff and volunteers should receive disability etiquette and awareness training for interacting effectively with and providing effective customer service to individuals with disabilities.
- All staff and volunteers should receive basic ADA training that addresses primary compliance responsibilities including nondiscrimination, equal opportunity, reasonable modification, effective communication, etc.
- Ensure that the City's ADA policies and related guidance are available to coaches, team organizers, and other volunteers. Issues of team eligibility, scheduling of events, and other administrative aspects of sports programming must not discriminate against participants, parents, visitors, spectators, coaches, etc. with disabilities.
- When planning and promoting special events, including temporary events on City property, involve disability organizations and individuals with disabilities in the planning process for the events.
- Develop a protocol for including accessibility considerations in the planning stage for all temporary events. Guidance for planning a temporary event can be found at <https://adata.org/publication/temporary-events-guide>.

Police Department

The Gardner Police Department is comprised of two divisions – Operations and Administration. The Operations Division is responsible for the daily patrol activities of the department. The officers assigned to this division respond to all calls for service and conduct the initial investigative duties related to any reported crime. Those duties include meeting with the reporting party, interviewing witnesses and suspects, collecting evidence and making arrests. The officers also conduct traffic accident investigations, along with a variety of self-initiated activities, such as traffic enforcement, narcotics detection/investigation, and residential and business checks. The Department's K9 Team, which is certified in Narcotics Detection and Patrol, is also assigned to this division. The Administration Division oversees the Investigations and Animal Control sections of the department. The investigations section processes crime scenes, completes follow-up investigations, submits completed cases to the District Attorney's Office, conducts citywide crime analysis, and maintains the evidence/property room. The animal control section handles all calls for service involving domestic and wild animal complaints, and completes follow-up investigations on animal bite cases. The Administration Division is also tasked with recordkeeping, fulfilling the reporting requirements of the KBI and FBI, oversight of the School Resource Officer Program, and the contract management and customer service functions of the department. The Department has 31 law enforcement members and three civilian employees.

In addition to ongoing patrol and law enforcement, programs and services of the Police Department include neighborhood safety, child safety, business security, neighborhood block parties, crosswalk safety, crime map, youth academy, code enforcement, and women's self-defense workshops.

TPB reviewed all current Police Department policies and procedures. Recommendations about specific policies are offered below.

RECOMMENDATIONS:

- Implement the City-wide Reasonable Modification Policy & Procedure discussed above.

- The department should be prepared to provide all of their forms, applications, statements, receipts, handouts and brochures in an accessible manner.
- All printed documents should contain a statement of non-discrimination when possible and should include a version of the following language:

“If you are in need of disability modifications or need alternate formats of any document please contact the City ADA Coordinator, City Clerk Jeanne Koontz.”
- When identification is required, the department should have a written policy describing the acceptable forms of official identification. Requiring a Driver’s License has been considered discriminatory in past litigation, as some people with disabilities are not eligible for a Driver’s License.
- All law enforcement officers and staff should receive disability etiquette and awareness training for interacting effectively with and providing effective customer service to individuals with disabilities.
- All law enforcement officers and staff should receive basic ADA training that addresses primary compliance responsibilities including nondiscrimination, equal opportunity, reasonable modification, effective communication, etc.
- Since the Police Department has separate policies for employees, it is imperative to coordinate with HR to verify that all Police Department employment policies and procedures are consistent with general HR policies and procedures.
- 4.2(E) – Citizen Complaints. The procedure for lodging an PD-related complaint is separate and different than the City’s ADA Grievance Procedure discussed above. The Police Department should coordinate with the City’s ADA Coordinator to determine which procedure will be used for individuals with disabilities wishing to lodge an ADA-related complaint.
- The PD manuals should specify details and policies regarding separating a person with a disability from their assistive device (Wheelchair; walker, polio braces, or any other auxiliary aid). Details for the care and storing and return of the device are needed.
- The PD manual should identify how and when an officer will search assistive devices – such as wheelchairs.
- Specific training and procedures should be part of the department and the manuals regarding properly transferring a person to - or from - a wheelchair into vehicles, jail cells, etc.
- The City and PD should consider adopting the attached document: “MODEL POLICY OF LAW ENFORCEMENT ON COMMUNICATION WITH PEOPLE WHO ARE DEAF OR HARD OF HEARING”.
- The City and PD should consider retaining the services or ensuring the availability of appropriate vehicles for the proper transporting of persons with disabilities while still situated in their assistive devices.
- The City should amend policies to define when prisoners or others may have food or other sustenance to maintain blood sugar levels when being held, transported or incarcerated.
- The City should ensure that the public and any interested parties know and can obtain auxiliary aids and services upon request; including: Sign language interpreters, readers, CART, video remote interpreting, etc. This information should be promulgated on the City and PD website, brochures, handouts and all associated communication. Specifically ensure that this information is imparted for specialty programs such as the Youth Academy and Women’s Self-Defense Workshops.

- 11.3(D) – Public Information & Media Relations – Add language regarding effective communication for individuals with sensory disabilities and the provision of auxiliary aids and services.
- 13.4(A) – Dealing with the Mentally Ill – This policy is an adequate start. However, given recent litigation regarding law enforcement and individuals with mental health conditions, it is recommended that the PD expand this policy to reflect People First language and include guidance specific to mental health conditions such as schizophrenia, bipolar disorder, and anxiety disorders.
- Develop and adopt a policy specific to interaction with people with disabilities. Police departments across the U.S. have adopted similar policies as a law enforcement best practice. These policies typically include guidance on interacting with individuals with a wide range of disabilities, providing effective communication, etc.
- 2010 DOJ guidelines relevant to law enforcement -

In September 2010, the U.S. Department of Justice published new guidelines for state and local governments, some specially intended for law enforcement implementation: *Part 35 Nondiscrimination on the Basis of Disability in State and Local Government Services Authority: 5 U.S.C. 301; 28 U.S.C. 509, 510; 42 U.S.C. 12134. Subparts A through G § 35.101 through § 35.190.*

The overall topics in the new DOJ regulations that affect the Police Department cover sweeping new regulations that should be reviewed and used to inform policies and procedures regarding:

- Service animals
- Jails and prisons
- Mobility devices
- Effective communication
- Direct Threat
- Qualified interpreters

- We recommend a series of targeted trainings on these recent, sweeping and essential changes in the Federal laws. In addition, the following actions should be incorporated into the department:
 - Revise the policy manual to reflect the six new 2010 DOJ regulations cited above.
 - Provide to the department specifically targeted training on the six DOJ topics above. Keep records of attendance, content, policy changes, format and other details regarding the specific trainings.
 - As just one example out of the six topics:
 - a. A section should be included in the manual and in training for how the department and officers will attend to service animals, including but not limited to such details as:
 - I. Identifying a true service animal and differentiating comfort and emotional security animals.
 - II. Separating the person from the service animal – Why and when

- III. Reuniting the person with the service animal – Identifying when and how reuniting will occur in the policies and procedures.
- IV. Incarceration with or without the service animal.
- V. Transportation of the service animal.
- VI. Care of the service animal.
- VII. Safety of other inmates, prisoners, etc.

- We recommend that all six of the newly revised DOJ Title II Regulations should be incorporated into officer training and policy manuals with the same scrutiny and depth as the example for service animals directly above.

NOTE: The following four of the six new DOJ Title II regulations apply to the City at large. Each and every department policy and interaction should reflect these new DOJ regulations:

- 1. Service animals
- 2. Mobility devices
- 3. Effective communication
- 4. Qualified interpreters

- We recommend that a backup location for detention and related activities be identified in the case of an individual using a wheelchair being detained, as the cell nor restroom facilities in the police building meet ADA requirements.

SECTION V: REGULATORY GUIDANCE, EXCERPTS, AND RESOURCES

DEFINITIONS

ADA Coordinator: One or more employees of a state or local government entity (Title II) with more than 50 full time employees. The ADA coordinator(s) are required under CFR §35.107 with developing and reviewing the government’s facilities, policies, programs, services and activities for citizens and employees with disabilities, establishing specific grievance procedures and other duties related to preventing and responding to issues of discrimination.

ADAAG: The Americans with Disabilities Act Accessibility Guidelines (2004 Edition). ADAAG is a part of the 2010 Americans with Disabilities Act Standards for Accessible Design.

City: The City Government of City of Gardner, Kansas

Existing Facility: a facility in existence on any given date, without regard to whether the facility may also be considered newly constructed or altered under this part.

Facility: All or any portion of buildings, structures, sites, complexes, equipment, rolling stock or other conveyances, roads, walks, passageways, parking lots, or other real or personal property, including the site where the building, property, structure, or equipment is located.

Public Employer - means any State or local government employer with 15 or more employees.

Public Entity - means (A) any State or local government; (B) Any department, agency, special purpose district, or other instrumentality of a State or States or local government; and (C) The National Railroad Passenger Corporation, and any commuter authority (as defined in section 103(8) of the Rail Passenger Service Act).

Qualified Individual with a Disability – means any individual who:

- Has a physical or mental impairment that substantially limits a "major life activity", or
- Has a record of such an impairment, or
- Is regarded as having such impairment
- For purposes of employment, a qualified individual with a disability is any individual with a disability who, with or without reasonable accommodation, can perform the essential functions of the employment position that such individual holds or desires.

Reasonable Accommodations - means (A) making existing facilities and worksites used by qualified employees with disabilities accessible to and usable by them (B) job restructuring, part-time or modified work schedules, reassignment to a vacant position, acquisition or modification of equipment or devices, appropriate adjustment or modifications of examinations, training materials or policies, the provision of qualified readers or interpreters, and other similar accommodations.

Self-Evaluation - means a public entity's assessment of its current programs, services, policies, practices and facilities. The Self-Evaluation is a review of all services, programs, and activities to identify any physical barriers, and/ or policies, practices, or procedures that may limit or exclude participation by people with disabilities. The Self-Evaluation includes permanent, temporary, and periodic services, programs, and activities.

Title II Entity: All state and local government, their agent's or instrumentalities, regardless of the government's size.

Undue Hardship - means an action requiring significant difficulty or expense when considered in light of the factors set forth in Section 101(10)(B) of the law, such as the nature and cost of the accommodation, the overall financial resources of the covered entity and the type of operations of the covered entity.

Key Definitions Summary - {See Public Law 101-336, Title I, Sections 101 and 201 and 29 Code of Federal Regulations (CFR) part 1630 of the Equal Employment Opportunity Commission (EEOC) Regulations Sections 1630.2 and 1630.3 for detailed definitions.}

REGULATORY OVERVIEW: ADA TITLES 1-5

ADA Title I: Employment

Title I of the Americans with Disabilities Act of 1990 (ADA) makes it unlawful for an employer to discriminate against a qualified applicant or current employee with a disability. The ADA applies to private employers with 15 or more employees and to state and local government employers. The U.S. Equal Employment Opportunity Commission (EEOC) enforces the employment provisions of the ADA.

An applicant for employment with a disability, like all other applicants, must meet the employer's requirements for the job; education, training, employment experience, skills, or licenses. An applicant with a disability must be able to perform the "essential functions" and the fundamental duties either on his/her own

or with the help of "reasonable accommodations." An employer does not have to provide a reasonable accommodation that creates an "undue hardship" which causes significant difficulty or expense.

Concerns related to employment within the City of Gardner should be directed to the City ADA Coordinator. For more specific information about ADA requirements affecting employment, contact:

Equal Employment Opportunity Commission

1801 L Street NW
Washington, DC 20507
1-800-669-EEOC
1-800-800-3302 (Text Telephone)

For the appropriate EEOC field office, contact: (800) 669-4000 (voice) (800) 669-6820 (TTY)
www.eeoc.gov

For information on how to accommodate a specific individual with a disability, contact the Job Accommodation Network at: (800) 526-7234 (voice/TTY)

ADA Title II: State and Local Government Activities

ADA Title II covers all activities of state and local governments regardless of the government entity's size or receipt of federal funding. Title II requires that state and local governments give people with disabilities an equal opportunity to benefit from all of their programs, services, and activities. State and local governments are required to follow specific architectural standards in the new construction and alteration of their buildings.

Title II Entities also must relocate programs or otherwise provide access in inaccessible older buildings, and communicate effectively with people who have hearing, vision, or speech disabilities. Public entities are not required to take actions that would result in undue financial and administrative burdens. They are required to make reasonable modifications to policies, practices, and procedures where necessary to avoid discrimination, unless they can demonstrate that doing so would fundamentally alter the nature of the service, program, or activity being provided.

Title II concerns or complaints are handled by the ADA Coordinator. Gardner has appointed the duties to the City Clerk. Because Gardner has more than 50 employees, they are also required to provide a Grievance process which was discussed in Section II.

Complaints of Title II violations may also be filed with the Department of Justice. In certain situations, cases may be referred to a mediation program sponsored by the Department of Justice, such as a state Human Rights Commission.

Title II complaints may be sent to:

Disability Rights Section
Civil Rights Division
U.S. Department of Justice

P.O. Box 66738
Washington, D.C. 20035-6738
Online at: http://www.ada.gov/filing_complaint.htm

For more specific information about ADA requirements affecting transportation, contact:

Department of Transportation
400 Seventh Street SW
Washington, DC 20590
(202) 366-9305 (VOICE) (202)755-7687 (TTY)

ADA Title III: Public Accommodations

Title III covers businesses and nonprofit service providers that are public accommodations. Public accommodations are private entities who own, lease, lease to, or operate facilities such as restaurants, retail stores, hotels, movie theaters, private schools, convention centers, doctors' offices, homeless shelters, funeral homes, day care centers, and recreation facilities including sports stadiums and fitness clubs, warehouses, industrial and commercial structures and agencies offering examinations.

Public accommodations are prohibited from exclusion, segregation, and unequal treatment in providing goods and services to people with disabilities. They must comply with architectural standards for new and altered buildings; reasonable modifications to policies, practices, and procedures; effective communication with people with hearing, vision, or speech disabilities; and other access requirements.

Please note – the City of Gardner does not enforce the ADA Standards for Accessible Design for new construction or alterations by public accommodations under Title III. However, the City Building inspector reviews construction projects, issues building permits and performs inspections based on the City of Gardner's adoption of the International Building Code. While the City does not enforce the ADA Standards for Accessible Design, the City has proactively decided to share responsibility to inform any Title III entity with whom they share services, lease structures, or use facilities of any known or identified shortcoming in the services, facilities, or policies. Conversely, if the City acts as the landlord or tenant, the City has a shared the responsibility that should be clarified in the written lease agreement.

- **CFR 36.201 (b):** Under the Code of Federal Regulations (CFR) General Prohibitions Against Discrimination for Title III. "***(b) Landlord and tenant responsibilities. Both the landlord who owns the building that houses a place of public accommodation and the tenant who owns or operates the place of public accommodation are public accommodations subject to the requirements of this part. As between the parties, allocation of responsibility for complying with the obligations of this part may be determined by lease or other contract.***"

Title III complaints may be sent to:

Disability Rights Section
Civil Rights Division
U.S. Department of Justice
P.O. Box 66738
Washington, D.C. 20035-6738
Online at: http://www.ada.gov/filing_complaint.htm

ADA Title IV: Telecommunications Relay Services

Title IV addresses telephone and television access for people with hearing and speech disabilities. Title IV requires common carriers (telephone companies) to establish interstate and intrastate telecommunications relay services (TRS) 24 hours a day, 7 days a week. TRS enables callers with hearing and speech disabilities who use telecommunications devices for the deaf (TDDs), which are also known as teletypewriters (TTYs), and callers who use voice telephones to communicate with each other through a third party communications assistant. The Federal Communications Commission (FCC) has set minimum standards for TRS services. Title IV also requires closed captioning of federally funded public service announcements.

Examples of auxiliary aids and services: Auxiliary aids and services include a wide range of services and devices that promote effective communication. Examples of auxiliary aids and services for individuals who are deaf or hard of hearing include qualified interpreters, note-takers, computer-aided transcription services, written materials, telephone handset amplifiers, assistive listening systems, telephones compatible with hearing aids, closed caption decoders, open and closed captioning, telecommunications devices for deaf persons (TDD's), videotext displays, and exchange of written notes.

Examples for individuals with vision impairments include qualified readers, taped texts, audio recordings, Brailled materials, large print materials, and assistance in locating items.

Examples for individuals with speech impairments include TDD's, computer terminals, speech synthesizers, and communication boards.

Title IV complaints may be sent to

Disability Rights Section
Civil Rights Division
U.S. Department of Justice
P.O. Box 66738
Washington, D.C. 20035-6738

Online at:

http://www.ada.gov/filing_complaint.htm

ADA Title V: Miscellaneous Provisions

Title V clarifies that both states and Congress are covered by all provisions of the ADA. It also provides for recovery of legal fees for successful proceedings pursuant to the Act and establishes a mechanism for technical assistance along with specific instructions to many federal agencies required to implement the Act. Additionally, Title V includes a provision prohibiting either (a) coercing or threatening or (b) retaliating against the disabled or those attempting to aid people with disabilities in asserting their rights under the ADA.

ADA TITLE II: REGULATION TITLE AND DOCUMENTATION

ADA Title II Regulations: Part 35 Nondiscrimination on the Basis of Disability in State and Local Government Services

Authority: 5 U.S.C. 301; 28 U.S.C. 509, 510; 42 U.S.C. 12134.

DEPARTMENT OF JUSTICE

28 CFR Part 35

RIN 1190-AA46

Nondiscrimination on the Basis of Disability in State and Local Government Services

AGENCY: Department of Justice, Civil Rights Division.

SUBPART D: PROGRAM ACCESSIBILITY (ABRIDGED)

Subpart D—Program Accessibility

§ 35.149 Discrimination prohibited.

Except as otherwise provided in § 35.150, no qualified individual with a disability shall, because a public entity's facilities are inaccessible to or unusable by individuals with disabilities, be excluded from participation in, or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity.

§ 35.150 Existing facilities

(a) General. A public entity shall operate each service, program, or activity so that the service, program, or activity, when viewed in its entirety, is readily accessible to and usable by individuals with disabilities. This paragraph does not—

(1) Necessarily require a public entity to make each of its existing facilities accessible to and usable by individuals with disabilities;

(2) Require a public entity to take any action that would threaten or destroy the historic significance of an historic property; or

(3) Require a public entity to take any action that it can demonstrate would result in a fundamental alteration in the nature of a service, program, or activity or in undue financial and administrative burdens. 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. If an action would result in such an alteration or such burdens, a public entity shall take any other action that would not result in such an alteration or such burdens but would nevertheless ensure that individuals with disabilities receive the benefits or services provided by the public entity.

(b) Methods.

(1) General. A public entity may comply with the requirements of this section through such means as redesign or acquisition of equipment, reassignment of services to accessible buildings, assignment of aides to beneficiaries, home visits, delivery of services at alternate accessible sites, alteration of existing facilities and construction of new facilities, use of accessible rolling stock or other conveyances, or any other methods that result in making its services, programs, or activities readily accessible to and usable by individuals with disabilities. A public entity is not required to make structural changes in existing facilities where other methods are effective in achieving compliance with this section. A public entity, in making alterations to existing buildings, shall meet the accessibility requirements of § 35.151. In choosing among available methods for meeting the requirements of this section, a public entity shall give priority to those methods that offer services, programs, and activities to qualified individuals with disabilities in the most integrated setting appropriate.

(2)

(i) Safe harbor. Elements that have not been altered in existing facilities on or after March 15, 2012, and that comply with the corresponding technical and scoping specifications for those elements in either the 1991 Standards or in the Uniform Federal Accessibility Standards (UFAS), Appendix A to 41 CFR part 101–19.6 (July 1, 2002 ed.), 49 FR 31528, app. A (Aug. 7, 1984) are not required to be modified in order to comply with the requirements set forth in the 2010 Standards.

(ii) The safe harbor provided in § 35.150(b)(2)(i) does not apply to those elements in existing facilities that are subject to supplemental requirements (i.e., elements for which there are neither technical nor scoping specifications in the 1991 Standards). Elements in the 2010 Standards not eligible for the element-by-element safe harbor are identified as follows—

(A) Residential facilities dwelling units, sections 233 and 809.

(B) Amusement rides, sections 234 and 1002; 206.2.9; 216.12.

(C) Recreational boating facilities, sections 235 and 1003; 206.2.10.

(D) Exercise machines and equipment, sections 236 and 1004; 206.2.13.

(E) Fishing piers and platforms, sections 237 and 1005; 206.2.14.

(F) Golf facilities, sections 238 and 1006; 206.2.15.

(G) Miniature golf facilities, sections 239 and 1007; 206.2.16.

(H) Play areas, sections 240 and 1008; 206.2.17.

(I) Saunas and steam rooms, sections 241 and 612.

(J) Swimming pools, wading pools, and spas, sections 242 and 1009.

(K) Shooting facilities with firing positions, sections 243 and 1010.

(L) Miscellaneous.

(1) Team or player seating, section 221.2.1.4.

(2) Accessible route to bowling lanes, section. 206.2.11.

(3) Accessible route in court sports facilities, section 206.2.12.

(3) Historic preservation programs. In meeting the requirements of § 35.150(a) in historic preservation programs, a public entity shall give priority to methods that provide physical access to individuals with disabilities. In cases where a physical alteration to an historic property is not required because of paragraph (a)(2) or (a)(3) of this section, alternative methods of achieving program accessibility include—

(i) Using audio-visual materials and devices to depict those portions of an historic property that cannot otherwise be made accessible;

(ii) Assigning persons to guide individuals with handicaps into or through portions of historic properties that cannot otherwise be made accessible; or

(iii) Adopting other innovative methods.

(c) 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 January 26, 1992, but in any event as expeditiously as possible.

(d) Transition Plan.

(1) In the event that structural changes to facilities will be undertaken to achieve program accessibility, a public entity that employs 50 or more persons shall develop, within six months of January 26, 1992, a Transition Plan setting forth the steps necessary to complete such changes. A public entity shall provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the development of the Transition Plan by submitting comments. A copy of the Transition Plan shall be made available for public inspection.

(2) If a public entity has responsibility or authority over streets, roads, or walkways, its Transition Plan shall include a schedule for providing curb ramps or other sloped areas where pedestrian walks cross curbs, giving priority to walkways serving entities covered by the Act, including State and local government offices and facilities, transportation, places of public accommodation, and employers, followed by walkways serving other areas.

(3) The plan shall, at a minimum—

(i) Identify physical obstacles in the public entity's facilities that limit the accessibility of its programs or activities to individuals with disabilities;

- (ii) Describe in detail the methods that will be used to make the facilities accessible;
 - (iii) Specify the schedule for taking the steps necessary to achieve compliance with this section and, if the time period of the Transition Plan is longer than one year, identify steps that will be taken during each year of the transition period; and
 - (iv) Indicate the official responsible for implementation of the plan.
- (4) If a public entity has already complied with the Transition Plan requirement of a Federal agency regulation implementing section 504 of the Rehabilitation Act of 1973, then the requirements of this paragraph (d) shall apply only to those policies and practices that were not included in the previous Transition Plan.

§ 35.151 New construction and alterations

(a) Design and construction.

(1) Each facility or part of a facility constructed by, on behalf of, or for the use of a public entity shall be designed and constructed in such manner that the facility or part of the facility is readily accessible to and usable by individuals with disabilities, if the construction was commenced after January 26, 1992.

(2) Exception for structural impracticability.

(i) Full compliance with the requirements of this section is not required where a public entity can demonstrate that it is structurally impracticable to meet the requirements. Full compliance will be considered structurally impracticable only in those rare circumstances when the unique characteristics of terrain prevent the incorporation of accessibility features.

(ii) If full compliance with this section would be structurally impracticable, compliance with this section is required to the extent that it is not structurally impracticable. In that case, any portion of the facility that can be made accessible shall be made accessible to the extent that it is not structurally impracticable.

(iii) If providing accessibility in conformance with this section to individuals with certain disabilities (e.g., those who use wheelchairs) would be structurally impracticable, accessibility shall nonetheless be ensured to persons with other types of disabilities, (e.g., those who use crutches or who have sight, hearing, or mental impairments) in accordance with this section.

(b) Alterations.

(1) Each facility or part of a facility altered by, on behalf of, or for the use of a public entity in a manner that affects or could affect the usability of the facility or part of the facility shall, to the maximum extent feasible, be altered in such manner that the altered portion of the facility is readily accessible to and usable by individuals with disabilities, if the alteration was commenced after January 26, 1992.

(2) The path of travel requirements of § 35.151(b)(4) shall apply only to alterations undertaken solely for purposes other than to meet the program accessibility requirements of § 35.150.

(3)

(i) Alterations to historic properties shall comply, to the maximum extent feasible, with the provisions applicable to historic properties in the design standards specified in § 35.151(c).

(ii) If it is not feasible to provide physical access to an historic property in a manner that will not threaten or destroy the historic significance of the building or facility, alternative methods of access shall be provided pursuant to the requirements of § 35.150.

(4) Path of travel. An alteration that affects or could affect the usability of or access to an area of a facility that contains a primary function shall be made so as to ensure that, to the maximum extent feasible, the path of travel to the altered area and the restrooms, telephones, and drinking fountains serving the altered area are readily accessible to and usable by individuals with disabilities, including individuals who use wheelchairs, unless the cost and scope of such alterations is disproportionate to the cost of the overall alteration.

(i) Primary function. A “primary function” is a major activity for which the facility is intended. Areas that contain a primary function include, but are not limited to, the dining area of a cafeteria, the meeting rooms in a conference center, as well as offices and other work areas in which the activities of the public entity using the facility are carried out.

(A) Mechanical rooms, boiler rooms, supply storage rooms, employee lounges or locker rooms, janitorial closets, entrances, and corridors are not areas containing a primary function. Restrooms are not areas containing a primary function unless the provision of restrooms is a primary purpose of the area, e.g., in highway rest stops.

(B) For the purposes of this section, alterations to windows, hardware, controls, electrical outlets, and signage shall not be deemed to be alterations that affect the usability of or access to an area containing a primary function.

(ii) A “path of travel” includes a continuous, unobstructed way of pedestrian passage by means of which the altered area may be approached, entered, and exited, and which connects the altered area with an exterior approach (including sidewalks, streets, and parking areas), an entrance to the facility, and other parts of the facility.

(A) An accessible path of travel may consist of walks and sidewalks, curb ramps and other interior or exterior pedestrian ramps; clear floor paths through lobbies, corridors, rooms, and other improved areas; parking access aisles; elevators and lifts; or a combination of these elements.

(B) For the purposes of this section, the term “path of travel” also includes the restrooms, telephones, and drinking fountains serving the altered area.

(C) Safe harbor. If a public entity has constructed or altered required elements of a path of travel in accordance with the specifications in either the 1991 Standards or the Uniform Federal Accessibility Standards before March 15, 2012, the public entity is not required to retrofit such elements to reflect incremental changes in the 2010 Standards solely because of an alteration to a primary function area served by that path of travel.

(iii) Disproportionality.

(A) Alterations made to provide an accessible path of travel to the altered area will be deemed disproportionate to the overall alteration when the cost exceeds 20 % of the cost of the alteration to the primary function area.

(B) Costs that may be counted as expenditures required to provide an accessible path of travel may include:

(1) Costs associated with providing an accessible entrance and an accessible route to the altered area, for example, the cost of widening doorways or installing ramps;

(2) Costs associated with making restrooms accessible, such as installing grab bars, enlarging toilet stalls, insulating pipes, or installing accessible faucet controls;

(3) Costs associated with providing accessible telephones, such as relocating the telephone to an accessible height, installing amplification devices, or installing a text telephone (TTY); and

(4) Costs associated with relocating an inaccessible drinking fountain.

(iv) Duty to provide accessible features in the event of disproportionality.

(A) When the cost of alterations necessary to make the path of travel to the altered area fully accessible is disproportionate to the cost of the overall alteration, the path of travel shall be made accessible to the extent that it can be made accessible without incurring disproportionate costs.

(B) In choosing which accessible elements to provide, priority should be given to those elements that will provide the greatest access, in the following order—

(1) An accessible entrance;

(2) An accessible route to the altered area;

(3) At least one accessible restroom for each sex or a single unisex restroom;

(4) Accessible telephones;

(5) Accessible drinking fountains; and

(6) When possible, additional accessible elements such as parking, storage, and alarms.

(v) Series of smaller alterations.

(A) The obligation to provide an accessible path of travel may not be evaded by performing a series of small alterations to the area served by a single path of travel if those alterations could have been performed as a single undertaking.

(B)

(1) If an area containing a primary function has been altered without providing an accessible path of travel to that area, and subsequent alterations of that area, or a different area on the same path of travel, are undertaken within three years of the original alteration, the total cost of alterations to the primary function areas on that path of travel during the preceding three-year period shall be considered in determining whether the cost of making that path of travel accessible is disproportionate.

(2) Only alterations undertaken on or after March 15, 2011, shall be considered in determining if the cost of providing an accessible path of travel is disproportionate to the overall cost of the alterations.

(c) Accessibility standards and compliance date.

(1) If physical construction or alterations commence after July 26, 1992, but prior to September 15, 2010, then new construction and alterations subject to this section must comply with either the UFAS or the 1991 Standards except that the elevator exemption contained at section 4.1.3(5) and section 4.1.6(1)(k) of the 1991 Standards shall not apply. Departures from particular requirements of either standard by the use of other methods shall be permitted when it is clearly evident that equivalent access to the facility or part of the facility is thereby provided.

(2) If physical construction or alterations commence on or after September 15, 2010, and before March 15, 2012, then new construction and alterations subject to this section may comply with one of the following: the 2010 Standards, UFAS, or the 1991 Standards except that the elevator exemption contained at section 4.1.3(5) and section 4.1.6(1)(k) of the 1991 Standards shall not apply. Departures from particular requirements of either standard by the use of other methods shall be permitted when it is clearly evident that equivalent access to the facility or part of the facility is thereby provided.

(3) If physical construction or alterations commence on or after March 15, 2012, then new construction and alterations subject to this section shall comply with the 2010 Standards.

(4) For the purposes of this section, ceremonial groundbreaking or razing of structures prior to site preparation do not commence physical construction or alterations.

(5) Noncomplying new construction and alterations.

(i) Newly constructed or altered facilities or elements covered by §§ 35.151(a) or (b) that were constructed or altered before March 15, 2012, and that do not comply with the 1991 Standards or with UFAS shall before March 15, 2012, be made accessible in accordance with either the 1991 Standards, UFAS, or the 2010 Standards.

(ii) Newly constructed or altered facilities or elements covered by §§ 35.151(a) or (b) that were constructed or altered before March 15, 2012 and that do not comply with the 1991 Standards or with UFAS shall, on or after March 15, 2012, be made accessible in accordance with the 2010 Standards.

ASSEMBLY AREAS: REGULATORY REQUIREMENTS IMPACTING PLANNING

“(g) **Assembly areas.** Assembly areas subject to this section shall comply with the provisions of the 2010 Standards applicable to assembly areas, including, but not limited to, sections 221 and 802. In addition, assembly areas shall ensure that—

(1) In stadiums, arenas, and grandstands, wheelchair spaces and companion seats are dispersed to all levels that include seating served by an accessible route;

(2) Assembly areas that are required to horizontally disperse wheelchair spaces and companion seats by section 221.2.3.1 of the 2010 Standards and have seating encircling, in whole or in part, a field of play or performance area shall disperse wheelchair spaces and companion seats around that field of play or performance area;

(3) Wheelchair spaces and companion seats are not located on (or obstructed by) temporary platforms or other movable structures, except that when an entire seating section is placed on temporary platforms or other movable structures in an area where fixed seating is not provided, in order to increase seating for an event, wheelchair spaces and companion seats may be placed in that section. When wheelchair spaces and companion seats are not required to accommodate persons eligible for those spaces and seats, individual, removable seats may be placed in those spaces and seats...”

DETENTION AND CORRECTIONAL FACILITIES: REGULATORY REQUIREMENTS IMPACTING PLANNING

(k) **Detention and correctional facilities.**

(1) New construction of jails, prisons, and other detention and correctional facilities shall comply with the 2010 Standards except that public entities shall provide accessible mobility features complying with section 807.2 of the 2010 Standards for a minimum of 3%, but no fewer than one, of the total number of cells in a facility. Cells with mobility features shall be provided in each classification level.

(2) Alterations to detention and correctional facilities. Alterations to jails, prisons, and other detention and correctional facilities shall comply with the 2010 Standards except that public entities shall provide accessible mobility features complying with section 807.2 of the 2010 Standards for a minimum of 3%, but no fewer than one, of the total number of cells being altered until at least 3%, but no fewer than one, of the total number of cells in a facility shall provide mobility features complying with section 807.2. Altered cells with mobility features shall be provided in each classification level. However, when alterations are made to specific cells, detention and correctional facility operators may satisfy their obligation to provide the required number of cells with mobility features by providing the required mobility features in substitute cells (cells other than those where alterations are originally planned), provided that each substitute cell—

(i) Is located within the same prison site;

(ii) Is integrated with other cells to the maximum extent feasible;

(iii) Has, at a minimum, equal physical access as the altered cells to areas used by inmates or detainees for visitation, dining, recreation, educational programs, medical services, work programs, religious services, and participation in other programs that the facility offers to inmates or detainees; and,

(iv) If it is technically infeasible to locate a substitute cell within the same prison site, a substitute cell must be provided at another prison site within the corrections system.

(3) With respect to medical and long-term care facilities in jails, prisons, and other detention and correctional facilities, public entities shall apply the 2010 Standards technical and scoping requirements for those facilities irrespective of whether those facilities are licensed.

§ 35.152 Jails, detention and correctional facilities, and community correctional facilities.

(a) General. This section applies to public entities that are responsible for the operation or management of adult and juvenile justice jails, detention and correctional facilities, and community correctional facilities, either directly or through contractual, licensing, or other arrangements with public or private entities, in whole or in part, including private correctional facilities.

(b) Discrimination prohibited.

(1) Public entities shall ensure that qualified inmates or detainees with disabilities shall not, because a facility is inaccessible to or unusable by individuals with disabilities, be excluded from participation in, or be denied the benefits of, the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity.

(2) Public entities shall ensure that inmates or detainees with disabilities are housed in the most integrated setting appropriate to the needs of the individuals. Unless it is appropriate to make an exception, a public entity—

(i) Shall not place inmates or detainees with disabilities in inappropriate security classifications because no accessible cells or beds are available;

(ii) Shall not place inmates or detainees with disabilities in designated medical areas unless they are actually receiving medical care or treatment;

(iii) Shall not place inmates or detainees with disabilities in facilities that do not offer the same programs as the facilities where they would otherwise be housed; and

(iv) Shall not deprive inmates or detainees with disabilities of visitation with family members by placing them in distant facilities where they would not otherwise be housed.

(3) Public entities shall implement reasonable policies, including physical modifications to additional cells in accordance with the 2010 Standards, so as to ensure that each inmate with a disability is housed in a cell with the accessible elements necessary to afford the inmate access to safe, appropriate housing.

POOL LIFT GUIDANCE

CONSIDERATIONS AND RECOMMENDATIONS FOR THE CITY OF GARDNER REGARDING ADDRESSING POOL ACCESSIBILITY AS OF MARCH 26, 2012:

- The United States Department of Justice (in the updated ADA Title III Regulation) states that pools, spas, and wading pools are not covered by the safe harbor provisions of the regulation.
- In the past the Department has implied that the provision of fixed pool lifts is the only way to provide full compliance with the 2010 Americans with Disabilities Act Standards for Accessible Design. However, the Department stated recently that “if an entity chooses to use a lift complying with the 2010 Standards that is removable or otherwise designated as ‘portable,’ it may do so, so long as while the lift is provided at the pool, it is affixed in some manner to the pool deck or apron.” (DOJ interpretation letter to American Hotel and Lodging Association, Feb 21, 2012).
- The Department recognizes that portable pool lifts that are not affixed can be acceptable alternatives to fixed lifts when a public accommodation can demonstrate that it would not be readily achievable to provide dedicated pool lifts at each pool (or spa, if a lift is the only means possible to provide access).
- If portable pool lifts are acquired, they must meet all of the requirements of pool lifts identified in sections 242 and 1009 of the 2010 ADA Standards, including the ability for individuals with disabilities to utilize the lift independently.
- If portable lifts are acquired, lift(s) must be in position and ready for use during all hours that the pool is open for use.
- The United States Access Board has published technical assistance documents on swimming pools, including *A Summary of Accessibility Guidelines for Recreation Facilities: Pools*, available online at <https://www.access-board.gov/attachments/article/594/pools.pdf>

RECOMMENDATIONS:

- **Assess the cost of providing fixed pool lifts at each pool that is required to be served by a lift and determine if that cost is or is not an “undue hardship”;**
- **Assess the cost of providing portable lifts and additional anchors at pool locations to determine if that cost is reasonable or if it is an “undue hardship”**
- **If fixed lifts are considered an undue hardship and portable lifts are not, acquire additional anchors for the portable lift be provided at pools not designated at the primary lift location**
- **When determining what action regarding pool lifts is appropriate, the City of Gardner should take into account other alterations and steps toward accessibility that are being taken and weigh priorities based on regulatory guidance as well as educated decisions regarding making alterations that will provide the greatest benefit to the widest range of customers with disabilities.**

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PARKING			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
No parking signs are provided at 3 spaces farthest from entrance.	502.6 Identification. Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1.		Install compliant signage mounted 60 inches minimum above the ground surface of the parking space.
No parking signs are provided at 3 spaces farthest from entrance.	502.6 Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.		Install compliant signage mounted 60 inches minimum above the ground surface of the parking space.
Areas of parking spaces/access aisles have slopes slightly exceeding 1:48.	502.4 Floor or Ground Surfaces. Parking spaces and access aisles serving them shall comply with 302. Access aisles shall be at the same level as the parking spaces they serve. Changes in level are not permitted.	Slopes not steeper than 1:48 shall be permitted in parking spaces and access aisles.	Address when resurfacing parking lot.

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APPROACH TO ENTRANCE			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
	302.3 Elongated openings shall be placed so that the long dimension is perpendicular to the dominant direction of travel.	<p>The diagram illustrates a rectangular grate with a series of vertical bars. Above the grate, a double-headed arrow points left and right, labeled 'dominant direction of travel'. To the left of the grate, a dimension line indicates the width of the grate, labeled '1/2 max 13'. Another dimension line indicates the length of the grate, labeled 'long dimension perpendicular to dominant direction of travel'.</p>	
SWIMMING POOLS			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
SMALL POOL AREA			
Pool lift is not mounted to deck.			See SECTION IV. REGULATORY GUIDANCE, EXCERPTS, AND RESOURCES: POOL LIFTS
Pool stair handrails are loose and wobbly under less than 100 lbs. pressure	505.9 Fittings. Handrails shall not rotate within their fittings.	ADAAG does not identify minimum weight capacity for handrails; however, existing condition is unsafe	Replace with compliant pool stair or other compliant means of accessible entry identified in Chapter 10.
Pool lift is not independently operable.	1009.2.7 Operation. The lift shall be capable of unassisted operation from both the deck and water levels. Controls and operating mechanisms shall be unobstructed when the lift is in use and shall comply with 309.4.		Replace with lift that is independently operable.

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RESTROOM FACILITIES			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
UNISEX RESTROOMS (2)			
Lavatory in clear floor space required for water closet.	604.3 Clearance. 604.3.1 Size. Clearance around a water closet shall be 60 inches (1525 mm) minimum measured perpendicular from the side wall and 56 inches (1420 mm) minimum measured perpendicular from the rear wall.		Arrangement is allowed in 1991 ADAAG and is covered by ADA SAFE HARBOR provisions.
Lavatory pipe surfaces exposed.	606.5 Exposed Pipes and Surfaces. Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.		Insulate pipes.
No coat hook provided within reach range.	604.8.3 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308.		Provide coat hook mounted 48" maximum above finish floor.
One unisex shower has a spray unit with hose.	608.6 Shower Spray Unit and Water. A shower spray unit with a hose 59 inches long minimum that can be used both as a fixed-position shower head and as a hand-held shower shall be provided. The shower spray unit shall have an on/off control with a non-positive shut-off.	If an adjustable-height shower head on a vertical bar is used, the bar shall be installed so as not to obstruct the use of grab bars. Shower spray units shall deliver water that is 120°F (49°C) maximum.	Install compliant spray unit with hose.

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WOMEN'S LOCKER ROOM			
No lowered coat hook provided.	603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.		Provide coat hook mounted 48 inches maximum above finish floor.
Benches provided are 16" deep.	903.3 Size. Benches shall have seats that are 42 inches (1065 mm) long minimum and 20 inches (510 mm) deep minimum and 24 inches (610 mm) deep maximum.		Replace benches with compliant benches.
Lavatory pipe surfaces exposed.	606.5 Exposed Pipes and Surfaces. Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.		Insulate pipes.
Hand operated metering faucets remain open for 3-5 seconds.	606.4 Faucets. Controls for faucets shall comply with 309. Hand-operated metering faucets shall remain open for 10 seconds minimum.		Adjust or replace faucet controls.
Knee clearance not provided beneath lavatory.	606 Lavatories and Sinks 606.2 Clear Floor Space. A clear floor space complying with 305, positioned for a forward approach, and knee and toe clearance complying with 306 shall be provided.	The dip of the overflow shall not be considered in determining knee and toe clearances. No more than one bowl of a multi-bowl sink shall be required to provide knee and toe clearance complying with 306.	Replace lavatory, providing knee and toe clearance complying with 305 and 306.

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There is no door pull on interior of ambulatory stall door.	604.8.2.2 Toilet Compartment Doors. A door pull complying with 404.2.7 shall be placed on both sides of the door near the latch.		Install compliant door pull.
MEN'S LOCKER ROOM			
No lowered coat hook provided.	603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.		Provide coat hook mounted 48 inches maximum above finish floor.
Benches provided are 16" deep.	903.3 Size. Benches shall have seats that are 42 inches (1065 mm) long minimum and 20 inches (510 mm) deep minimum and 24 inches (610 mm) deep maximum.		Replace benches with compliant benches.
Lavatory pipe surfaces exposed.	606.5 Exposed Pipes and Surfaces. Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.		Insulate pipes.
Hand operated metering faucets remain open for 3-5 seconds.	606.4 Faucets. Controls for faucets shall comply with 309. Hand-operated metering faucets shall remain open for 10 seconds minimum.		Adjust or replace faucet controls.
Knee clearance not provided beneath lavatory.	606 Lavatories and Sinks 606.2 Clear Floor Space. A clear floor space complying with 305,	The dip of the overflow shall not be considered in determining knee and toe clearances.	Replace lavatory, providing knee and toe clearance complying with 305 and 306.

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	positioned for a forward approach, and knee and toe clearance complying with 306 shall be provided.	No more than one bowl of a multi-bowl sink shall be required to provide knee and toe clearance complying with 306.	
There is no door pull on interior of ambulatory stall door.	604.8.2.2 Toilet Compartment Doors. A door pull complying with 404.2.7 shall be placed on both sides of the door near the latch.		Install compliant door pull.
OTHER AREAS OR ELEMENTS			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
Handrail on ramp in raised tanning area at large pool is separated from its fitting.	505.9 Fittings. Handrails shall not rotate within their fittings.		Securely reattach handrail.
Ramp structure slopes up to 9.4% (initial concrete run).	405 Ramps 405.2 Slope. Ramp runs shall have a running slope not steeper than 1:12.		Mitigate slope to provide 1:12 run.
Curved sections of ramp have areas that have cross slope slightly in excess of 1:48.	405.3 Cross Slope. Cross slope of ramp runs shall not be steeper than 1:48.		Mitigate cross slope.
Entrance: Service counter is 41" high.	904.4 Sales and Service Counters. Sales counters and service counters shall comply with 904.4.1 or 904.4.2. The accessible portion of the counter top shall extend the same depth as the sales or service counter top.		
Concession and service counters are 39-42 inches above ground surface.	904.4 Sales and Service Counters. Sales counters and service counters shall comply with 904.4.1 or 904.4.2.	The accessible portion of the counter top shall extend the same depth as the sales or service counter top.	Provide counters 36" high (34" if to be used as work/writing surface).

PLAY AREA SUMMARY

COMPOSITE PLAY STRUCTURE IN LARGE POOL

Number of Elevated Play Components: 12

Number of Elevated Play Components Connected by Ramps: 0

Number of Elevated Play Components Connected by Transfer Systems: 12

Number of Ground Level Play Components: 0

Types of Ground Level Play Components: 0

Number of Ground Level Play Components on Accessible Route: 0

Types Ground Level Play Components on Accessible Route: 0

Number of Ground Level Play Components Required to be on Accessible Route: 0

SUPPLEMENTAL PHOTOGRAPHIC GUIDANCE



Address minor cross slope issues in spaces in future resurfacing



Trim trees to ensure signs are visible

SUPPLEMENTAL PHOTOGRAPHIC GUIDANCE



Signage needed at parking near Cornerstone Park



Grate openings 2"; replace with compliant models (gaps 1/2" max)

SUPPLEMENTAL PHOTOGRAPHIC GUIDANCE



Pool stairs meet many requirements of ADAAG but are unstable



Pool lift not independently operable

Pool lift not mounted to deck

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PARKING AND APPROACH			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
No accessible parking is provided.	208.2 Minimum Number. Parking spaces complying with 502 shall be provided in accordance with Table 208.2 except as required by 208.2.1, 208.2.2, and 208.2.3.		Add 1 van accessible parking space with access aisle and signage. Provide connection to accessible route to park.
There is no accessible route from parking to park elements and features such as play areas and shelter.	402.2 Accessible Route Components. Accessible routes shall consist of one or more of the following components: walking surfaces with a running slope not steeper than 1:20, doorways, ramps, curb ramps excluding the flared sides, elevators, and platform lifts. All components of an accessible route shall comply with the applicable requirements of Ch. 4.		Provide accessible route to all park elements and features that connects with accessible parking.
PLAY AREAS			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
Accessible routes not provided to play components.	206.2.17.1 Ground Level and Elevated Play Components. At least one accessible route shall be provided within the play area. The accessible route shall connect ground level play components required to comply with 240.2.1 and elevated play components required to comply with 240.2.2, including entry and exit points of the play components.		Provide accessible route to one of each type of ground level play component and access point(s) of composite play structure containing elevated play components.

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Compliant ground surfaces are not provided in play areas	1008.2.6 Ground Surfaces. Ground surfaces on accessible routes, clear floor or ground spaces, and turning spaces shall comply with 1008.2.6.		Replace mulch with permanent surface that comply with ASTM F 1951
Compliant ground surfaces are not provided in play areas.	1008.2.6.1 Accessibility. Ground surfaces shall comply with ASTM F 1951 (incorporated by reference, see "Referenced Standards" in Chapter 1). Ground surfaces shall be inspected and maintained regularly and frequently to ensure continued compliance with ASTM F 1951.		Replace mulch with permanent surface that comply with ASTM F 1951
Compliant ground surfaces are not provided in play areas.	1008.2.6.2 Use Zones. Ground surfaces located within use zones shall comply with ASTM F 1292 (1999 edition or 2004 edition) (incorporated by reference, see "Referenced Standards" in Ch. 1).		In use zones, replace mulch with permanent surface that provides impact attenuation (ASTM 1292) as well as compliance with ASTM F 1951
OTHER AREAS OR ELEMENTS			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
SHELTER			
Gaps and slope issues related to settling of concrete pad.	302.3 Openings. Openings in floor or ground surfaces shall not allow passage of a sphere more than 1/2-inch (13 mm) diameter 403.3 Slope. The running slope of walking surfaces shall not be steeper than 1:20. The cross slope of walking surfaces shall not be steeper than 1:48.		Repair/replace concrete pad

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BRIDGE			
Bridge crossing waterway is a ramp; compliant handrails are not in place.	405.8 Handrails. Ramp runs with a rise greater than 6 inches (150 mm) shall have handrails complying with 505.		Install compliant handrails on both sides of bridge, including 12" extensions at each entry/exit point

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PLAY AREA SUMMARY

PLAY AREA CONTAINS 1 COMPOSITE PLAY STRUCTURE AND SWINGS

Number of Elevated Play Components: 5

Number of Elevated Play Components Connected by Ramps: 0

Number of Elevated Play Components Connected by Transfer Systems: 4 (Compliant)

Number of Ground Level Play Components: 8

Types of Ground Level Play Components:

- 2 Tactile Spinning Devices
- 2 Communicators
- 2 Swings
- 2 Toddler Swings

Number of Ground Level Play Components on Accessible Route: 0

Types Ground Level Play Components on Accessible Route: 0

Number of Ground Level Play Components Required to be on Accessible Route: 4 (one of each type)

SUPPLEMENTAL PHOTOGRAPHIC GUIDANCE



Recommended location of accessible parking.



Large gap affecting slope of shelter ground surface.

SUPPLEMENTAL PHOTOGRAPHIC GUIDANCE



Bridge has ramp slope and requires compliant handrails.

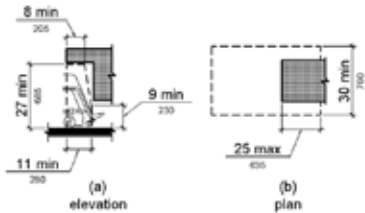


Provide compliant handrails and ensure effective edge protection.
Handrails may be mounted to existing wood surface (34-38" ht.)

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PARKING AND APPROACH			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
There are no accessible routes to football field, baseball fields #5 and #6, or soccer fields.	Accessible Routes 206.2.2 Within a Site. At least one accessible route shall connect accessible buildings, accessible facilities, accessible elements, and accessible spaces that are on the same site.	EXCEPTION: An accessible route shall not be required between accessible buildings, accessible facilities, accessible elements, and accessible spaces if the only means of access between them is a vehicular way not providing pedestrian access.	Provide accessible route from accessible parking to soccer, football, and baseball fields 5 & 6. To provide access to soccer fields, consider first step of accessible route between fields 6 & 7.
PLAY AREAS			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
Accessible routes not provided to play components.	206.2.17.1 Ground Level and Elevated Play Components. At least one accessible route shall be provided within the play area. The accessible route shall connect ground level play components required to comply with 240.2.1 and elevated play components required to comply with 240.2.2, including entry and exit points of the play components.		Provide accessible route to one of each type of ground level play component and access point(s) of composite play structure containing elevated play components.
Compliant ground surfaces are not provided in play areas.	1008.2.6 Ground Surfaces. Ground surfaces on accessible routes, clear floor or ground spaces, and turning spaces shall comply with 1008.2.6.		Replace mulch with permanent surface that comply with ASTM F 1951
Compliant ground surfaces are not provided in play areas.	1008.2.6.1 Accessibility. Ground surfaces shall comply with ASTM F 1951 (incorporated by reference,		Replace mulch with permanent surface that comply with ASTM F 1951

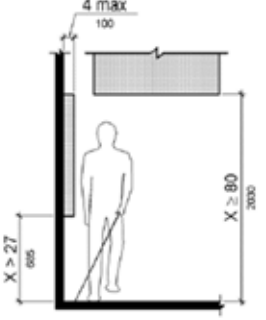
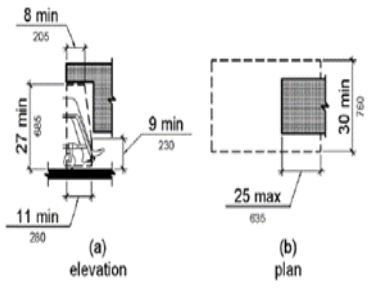
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	see "Referenced Standards" in Chapter 1). Ground surfaces shall be inspected and maintained regularly and frequently to ensure continued compliance with ASTM F 1951.		
Compliant ground surfaces are not provided in play areas.	1008.2.6.2 Use Zones. Ground surfaces located within use zones shall comply with ASTM F 1292 (1999 edition or 2004 edition) (incorporated by reference, see "Referenced Standards" in CH. 1).		In use zones, replace mulch with permanent surface that provides impact attenuation (ASTM 1292) as well as compliance with ASTM F 1951
Kids Barn is not on an accessible route.	240.2.1.1 Minimum Number and Types. Where ground level play components are provided, at least one of each type shall be on an accessible route and shall comply with 1008.4.		
OTHER AREAS OR ELEMENTS			
EXISTING CONDITION	2010 ADA STANDARD CITATION	ADDITIONAL GUIDANCE	RECOMMENDATIONS
There are non-compliant handrails provided on bridge on walking trail.	403.6 Handrails. Where handrails are provided along walking surfaces with running slopes not steeper than 1:20 they shall comply with 505.		Add compliant handrails.
Scorekeeper platforms at baseball fields are inaccessible.	902.2 Clear Floor or Ground Space. A clear floor space complying with 305 positioned for a forward approach shall be provided. Knee and toe clearance complying with 306 shall be provided.		Provide work stations complying with 902.2.
Field 3: Drop of 4" from dugout level to field.	303.4 Ramps. Changes in level greater than 1/2 inch (13 mm) high		Mitigate change in level

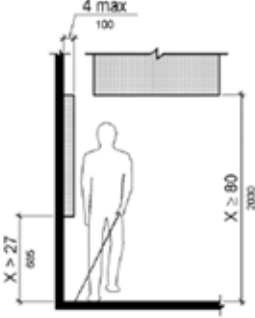
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Field 5 & 6: Drops of 1-4" from dugout level to field.	shall be ramped, and shall comply with 405 or 406.		
Player seating benches in dugouts are 11-1/2" deep.	903.3 Size. Benches shall have seats that are 42 inches (1065 mm) long minimum and 20 inches (510 mm) deep minimum and 24 inches (610 mm) deep maximum.		Provide benches that meet requirements of 903.
RESTROOM FACILITIES			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
BASEBALL FIELD WOMEN'S RESTROOM			
Hand dryers are protruding objects.	307 Protruding Objects 307.2 Protrusion Limits. Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path. EXCEPTION: Handrails shall be permitted to protrude 4 1/2 inches (115 mm) maximum.		Replace or relocate out of circulation path. Provide detectable barrier below hand dryer that is not in accessible route or clear floor space for any element.
No lower coat hook provided.	604.8.3 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308.		Provide coat hook mounted 48" maximum above finish floor.
Grab bars mounted with top of gripping surface at 37" above finish floor.	609.4 Position of Grab Bars. Grab bars shall be installed in a horizontal position, 33 inches (840 mm) minimum and 36 inches (915 mm) maximum above the finish floor measured to the top of the gripping surface.		Position grab bars within ranges noted in 609.4.

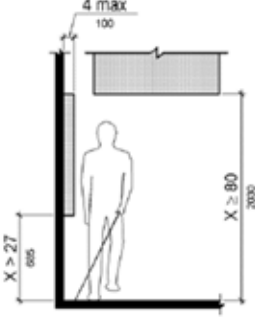
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BASEBALL FIELD MEN'S RESTROOM			
<p>Hand dryers are protruding objects.</p>	<p>307 Protruding Objects 307.2 Protrusion Limits. Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path. EXCEPTION: Handrails shall be permitted to protrude 4 1/2 inches (115 mm) maximum.</p>		<p>Replace or relocate out of circulation path.</p> <p>Provide detectable barrier below hand dryer that is not in accessible route or clear floor space for any element.</p>
<p>No lower coat hook provided.</p>	<p>604.8.3 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308.</p>		<p>Provide coat hook mounted 48" maximum above finish floor.</p>
<p>Grab bars mounted with top of gripping surface at 37" above finish floor.</p>	<p>609.4 Position of Grab Bars. Grab bars shall be installed in a horizontal position, 33 inches (840 mm) minimum and 36 inches (915 mm) maximum above the finish floor measured to the top of the gripping surface.</p>		<p>Position grab bars within ranges noted in 609.4.</p>
<p>No knee clearance provided at drinking fountain outside restroom.</p>	<p>602.2 Clear Floor Space. Units shall have a clear floor or ground space complying with 305 positioned for a forward approach and centered on the unit. Knee and toe clearance complying with 306 shall be provided.</p>		<p>Replace with unit meeting requirements of 602.</p>

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SHELTER WOMEN'S RESTROOM			
There are no pulls on stall door.	Toilet Compartments 604.8.2.2 Doors. A door pull complying with 404.2.7 shall be placed on both sides of the door near the latch.		Install compliant pulls on both sides of door.
Hand dryers are protruding objects.	307 Protruding Objects 307.2 Protrusion Limits. Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path. EXCEPTION: Handrails shall be permitted to protrude 4 1/2 inches (115 mm) maximum.		Replace or relocate out of circulation path. Provide detectable barrier below hand dryer that is not in accessible route or clear floor space for any element.
No lower coat hook provided.	604.8.3 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308.		Provide coat hook mounted 48" maximum above finish floor.
Grab bars mounted with top of gripping surface at 37" above finish floor.	609.4 Position of Grab Bars. Grab bars shall be installed in a horizontal position, 33 inches (840 mm) minimum and 36 inches (915 mm) maximum above the finish floor measured to the top of the gripping surface.		Position grab bars within ranges noted in 609.4.
Exposed pipes beneath lavatory.	606.5 Exposed Pipes and Surfaces. Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.		Insulate exposed areas.

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SHELTER MEN'S RESTROOM			
There are no pulls on stall door.	Toilet Compartments 604.8.2.2 Doors. A door pull complying with 404.2.7 shall be placed on both sides of the door near the latch.		Install compliant pulls on both sides of door.
Hand dryers are protruding objects.	307 Protruding Objects 307.2 Protrusion Limits. Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path. EXCEPTION: Handrails shall be permitted to protrude 4 1/2 inches (115 mm) maximum.		Replace or relocate out of circulation path. Provide detectable barrier below hand dryer that is not in accessible route or clear floor space for any element.
No lower coat hook provided.	604.8.3 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308.		Provide coat hook mounted 48" maximum above finish floor.
Grab bars mounted with top of gripping surface at 37" above finish floor.	609.4 Position of Grab Bars. Grab bars shall be installed in a horizontal position, 33 inches (840 mm) minimum and 36 inches (915 mm) maximum above the finish floor measured to the top of the gripping surface.		Position grab bars within ranges noted in 609.4.

PLAY AREA SUMMARY

1) PLAY AREA – BASEBALL FIELDS

PLAY AREA CONTAINS COMPOSITE PLAY STRUCTURE

Number of Elevated Play Components: 7

Number of Elevated Play Components Connected by Ramps: 0

Number of Elevated Play Components Connected by Transfer Systems: 0 (4 REQUIRED)

Number of Ground Level Play Components: 4

Types of Ground Level Play Components:

- 1 Slide
- 2 Communicators
- 1 Gear Wheel

Number of Ground Level Play Components on Accessible Route: 0

Types Ground Level Play Components on Accessible Route: 0

Number of Ground Level Play Components Required to be on Accessible Route: 3 (one of each type)

PLAY AREA SUMMARY

2) SMALL SHELTER PLAY AREA

PLAY AREA CONTAINS ONE COMPOSITE PLAY STRUCTURE, ONE ROCK WALL, ONE SLIDE, AND SWINGS

Number of Elevated Play Components: 5

Number of Elevated Play Components Connected by Ramps: 0

Number of Elevated Play Components Connected by Transfer Systems: 5

Number of Ground Level Play Components: 6

Types of Ground Level Play Components:

- 1 Rock Wall Climber
- 2 Toddler Swings
- 1 Play Bench
- 2 Rockers

Number of Ground Level Play Components on Accessible Route: 0

Types Ground Level Play Components on Accessible Route: 0

Number of Ground Level Play Components Required to be on Accessible Route: 4 (one of each type)

PLAY AREA SUMMARY

3) LARGE SHELTER PLAY AREA

PLAY AREA CONTAINS COMPOSITE PLAY STRUCTURE, FREE STANDING GROUND LEVEL PLAY COMPONENTS, 5 SWINGS, AND ONE SLIDE

Number of Elevated Play Components: 8

Number of Elevated Play Components Connected by Ramps: 0

Number of Elevated Play Components Connected by Transfer Systems: 6

Number of Ground Level Play Components: 15

Types of Ground Level Play Components:

- 1 Rock Wall
- 1 Spin Climber
- 2 Communicators
- 5 Swings
- 1 Play Seat
- 1 Rope Climber
- 1 Spring Rider
- 1 Set Balance Beams
- 2 Diggers

Number of Ground Level Play Components on Accessible Route: 1 (Digger)

Types Ground Level Play Components on Accessible Route: 1

Number of Ground Level Play Components Required to be on Accessible Route: 9 (one of each type)

SUPPLEMENTAL PHOTOGRAPHIC GUIDANCE



Example of ground level play component on an accessible route



Current inaccessible surfaces are unusable in inclement weather

SUPPLEMENTAL PHOTOGRAPHIC GUIDANCE



Access to soccer fields begins at established accessible parking



Provide accessible alternative to raised scorekeepers station(s)

SUPPLEMENTAL PHOTOGRAPHIC GUIDANCE



Example of change in level from dugout to field
Conditions fluctuate; include in maintenance procedures

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PARKING AND APPROACH			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
No accessible parking is provided.	208.2 Minimum Number. Parking spaces complying with 502 shall be provided in accordance with Table 208.2 except as required by 208.2.1, 208.2.2, and 208.2.3.	7 on street spaces are provided, requiring 2 accessible spaces (1 van accessible). However, conversion of parking space to van accessible would reduce space number to 6, requiring only the one van accessible space.	Designate van accessible parking spaces with access aisles and compliant signage mounted 60" minimum above surface of parking space. Option 2: Shared parking with Aquatic Center
No signage is provided for accessible parking.	502.6 Identification. Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1.		Provide signage space mounted 60" minimum above parking space ground surface.
No van accessible sign is present.	502.6 Signs identifying van parking spaces shall contain the designation "van accessible."		Provide "van accessible" signage for parking space mounted 60" minimum above parking space ground surface.
Parking does not adjoin an accessible route.	502.3 Access Aisle. Access aisles shall adjoin an accessible route.		Provide curb ramp adjoining access aisle and accessible route to park features.
There are no accessible routes to amphitheater or pet care bag area	Accessible Routes 206.2.2 Within a Site. At least one accessible route shall connect accessible buildings, accessible facilities, accessible elements, and accessible spaces that are on the same site.		Provide accessible route to amphitheater connecting to designated accessible seating area. Provide pet care bags on an accessible route arranged for forward or parallel approach.

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PLAY AREAS			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
Accessible routes are not provided to play components.	Accessible Routes 206.2.17 Play Areas. Play areas shall provide accessible routes in accordance with 206.2.17. Accessible routes serving play areas shall comply with Chapter 4 except as modified by 1008.2.		Provide accessible route to one of each type of ground level play component and the base of composite play structures containing elevated play components.
Compliant ground surfaces are not provided in play areas.	1008.2.6 Ground Surfaces. Ground surfaces on accessible routes, clear floor or ground spaces, and turning spaces shall comply with 1008.2.6.		Replace mulch with permanent surface that comply with ASTM F 1951.
Compliant ground surfaces are not provided in play areas.	1008.2.6.1 Accessibility. Ground surfaces shall comply with ASTM F 1951 (incorporated by reference, see "Referenced Standards" in Chapter 1). Ground surfaces shall be inspected and maintained regularly and frequently to ensure continued compliance with ASTM F 1951.		Replace mulch with permanent surface that comply with ASTM F 1951.
Compliant ground surfaces are not provided in play areas.	1008.2.6.2 Use Zones. Ground surfaces located within use zones shall comply with ASTM F 1292 (1999 edition or 2004 edition) (incorporated by reference, see "Referenced Standards" in Ch. 1).		In use zones, replace mulch with permanent surface that provides impact attenuation (ASTM 1292) as well as compliance with ASTM F 1951.

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OTHER SPACES OR ELEMENTS			
One drinking fountain is provided.	211.2 Minimum Number. No fewer than two drinking fountains shall be provided. One drinking fountain shall comply with 602.1 through 602.6 and one drinking fountain shall comply with 602.7.	EXCEPTION: Where a single drinking fountain complies with 602.1 through 602.6 and 602.7, it shall be permitted to be substituted for two separate drinking fountains.	Install compliant hi-lo drinking fountain combination.
Changes in level of 1" and gaps in cobblestone on path around park, primarily at rear of park.	303.2 Changes in level greater than 1/2 inch (13 mm) high shall be ramped, and shall comply with 405 or 406.		Bevel or otherwise mitigate changes in level.

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PLAY AREA SUMMARY

PLAY AREA CONTAINS 1 COMPOSITE PLAY STRUCTURE

Number of Elevated Play Components: 6

Number of Elevated Play Components Connected by Ramps: 0

Number of Elevated Play Components Connected by Transfer Systems: 6

Number of Ground Level Play Components: 10

Types of Ground Level Play Components:

- 2 Pull Up Bars
- 2 Communicators
- 1 Spring Rocker
- 2 Balance Bars
- 1 Lily Pad Walker
- 1 Control Panel
- 1 Slide

Number of Ground Level Play Components on Accessible Route: 1 (Slide)

Types of Ground Level Play Components on Accessible Route: 1

Number of Ground Level Play Components Required to be on Accessible Route: 6 (one of each type)

SUPPLEMENTAL PHOTOGRAPHIC GUIDANCE



Parking at Aquatic Center can be shared with Cornerstone Park



Install compliant curb ramp on an accessible route from parking
Position curb ramp to ensure level landing area at top

SUPPLEMENTAL PHOTOGRAPHIC GUIDANCE



Grates with large openings should be replaced with compliant grates Re-locate to be on accessible route, within reach range (48" high max.)

SUPPLEMENTAL PHOTOGRAPHIC GUIDANCE



View of amphitheater; access needed to seating area
Access needed to performance area (yellow arrow)



View of amphitheater from rear

SUPPLEMENTAL PHOTOGRAPHIC GUIDANCE



Shortest route to provide access is from aquatic center lot
Route here could tie in both seating area and performance area
Red: One option for route to provide minimal program access

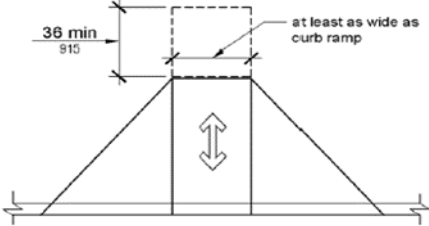


View of Aquatic Center Accessible Parking that can serve Cornerstone
Curb cut(s) needed to connect accessible route
Red Arrow: Location of same option for route to amphitheater

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 GARDNER CITY HALL 120 E. MAIN STREET

PARKING			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
No “van accessible” sign is in place	502.6 Signs identifying van parking spaces shall contain the designation "van accessible."		Either or both spaces are large enough to be van accessible; provide sign for at least one space.
Signs are mounted slightly low	502.6 Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.		Raise signs slightly to ensure bottom of sign is 60” minimum above surface of parking space
APPROACH TO ENTRANCE			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
One of two public entrances area accessible.	206.4.1 Public Entrances. In addition to entrances required by 206.4.2 through 206.4.9, at least 60 percent of all public entrances shall comply with 404.	There are two public entrances.	50 percent of entrances being accessible was requirement under 1991 ADAAG; covered by SAFE HARBOR provisions of ADA. Improve access to meet 60% as possible through future building upgrades.
There is no directional signage at inaccessible entrances.	216.6 Entrances. Where not all entrances comply with 404, entrances complying with 404 shall be identified by the International Symbol of Accessibility complying with 703.7.2.1. Directional signs complying with 703.5 that indicate the location of the		Provide directional signage at rear public entrance and side employee entrance.

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	nearest entrance complying with 404 shall be provided at entrances that do not comply with 404.		
There is no landing at the top of the curb ramp serving accessible parking spaces.	406.4 Landings. Landings shall be provided at the tops of curb ramps. The landing clear length shall be 36 inches (915 mm) minimum. The landing clear width shall be at least as wide as the curb ramp, excluding flared sides, leading to the landing.		Create landing space or reposition parking with new connection to accessible route.
Running slope of accessible route to main entrance exceeds 1:20 for run of less than 6 feet	403.3 Slope. The running slope of walking surfaces shall not be steeper than 1:20.		Resurface to maintain 1:20 slope throughout route.
Cross slope of accessible route to main entrance exceeds 5%	403.3 Slope The cross slope of walking surfaces shall not be steeper than 1:48.		Resurface to maintain 1:48 max. cross-slope throughout route.
Matts are not fastened to floor in entry vestibule	302.1 Exposed edges of matts shall be fastened to floor or ground surfaces and shall have trim on the entire length of the exposed edge		Affix edges of matts to floor surface or remove matts
ROOMS AND SPACES			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
COUNCIL CHAMBERS			
There is one step on the route from the council chamber entrance to the council seating area. Access is currently provided through a non-public employee	303.2 Changes in level greater than 1/2 inch (13 mm) high shall be ramped, and shall comply with 405 or 406.		Provide compliant sloped access to council seating area on accessible route.

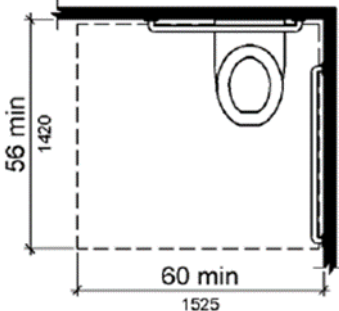
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<p>entrance at side of building. Thus, many people with mobility impairments will be able to reach the council seating area with assistance.</p>			
<p>LOBBY</p>			
<p>There is no compliant approach to the Parks and Recreation/City Administration service counter.</p>	<p>904.4.1 Parallel Approach. A portion of the counter surface that is 36 inches (915 mm) long minimum and 36 inches (915 mm) high maximum above the finish floor shall be provided. A clear floor or ground space complying with 305 shall be positioned for a parallel approach adjacent to the 36 inch (915 mm) minimum length of counter.</p>	<p>EXCEPTION: Where the provided counter surface is less than 36 inches (915 mm) long, the entire counter surface shall be 36 inches (915 mm) high maximum above the finish floor.</p>	<p>Reconfigure approach/counter position to provide parallel approach space.</p>
<p>Fixed bench seating in lobby is inaccessible.</p>	<p>903.3 Size. Benches shall have seats that are 42 inches (1065 mm) long minimum and 20 inches (510 mm) deep minimum and 24 inches (610 mm) deep maximum.</p>		<p>Replace bench seating with compliant fixed seating.</p>

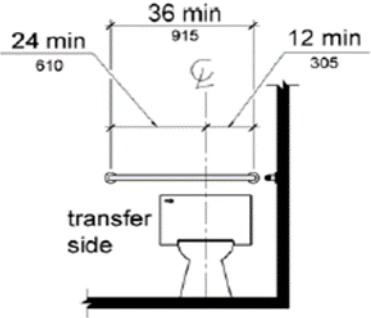
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RESTROOM FACILITIES			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
MEN'S AND WOMEN'S RESTROOMS			
There is no door pull on exterior of toilet compartment door in Men's or Women's restrooms.	604.8.2.2 Toilet Compartment Doors. A door pull complying with 404.2.7 shall be placed on both sides of the door near the latch.		Add door pull on exterior side of compartment door.
	Visible and audible emergency alert systems in place		
UNISEX RESTROOM			
Unisex restroom is not on an accessible route from a public entrance.	402.2 Accessible Route Components. Accessible routes shall consist of one or more of the following components: walking surfaces with a running slope not steeper than 1:20, doorways, ramps, curb ramps excluding the flared sides, elevators, and platform lifts. All components of an accessible route shall comply with the applicable requirements of Chapter 4.	404.3.7 Revolving Doors, Revolving Gates, and Turnstiles. Revolving doors, revolving gates, and turnstiles shall not be part of an accessible route.	Provide compliant sloped accessible route through council chambers.

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<p>Lavatory overlaps water closet clearance.</p>	<p>604.3 Clearance. 604.3.1 Size. Clearance around a water closet shall be 60 inches (1525 mm) minimum measured perpendicular from the side wall and 56 inches (1420 mm) minimum measured perpendicular from the rear wall.</p>		<p>Toilet room renovation/relocation required to remove barrier.</p>
<p>There is no turning space in toilet room</p>	<p>603 Toilet and Bathing Rooms 603.2.1 Turning Space. Turning space complying with 304 shall be provided within the room.</p>	<p>5' Radius or T-Shaped turn</p>	<p>Toilet room renovation/relocation required to remove barrier.</p>
<p>Door swings into clear floor space for fixtures. 30" X 48" clear floor space beyond door swing is not provided.</p>	<p>603.2.3 Door Swing. Doors shall not swing into the clear floor space or clearance required for any fixture. Doors shall be permitted to swing into the required turning space.</p>	<p>Where the toilet room or bathing room is for individual use and a clear floor space complying with 305.3 is provided within the room beyond the arc of the door swing, doors shall be permitted to swing into the clear floor space or clearance required for any fixture.</p>	<p>Toilet room renovation/relocation required to remove barrier.</p>
<p>Mirror mounted with bottom of reflecting surface 45" above floor.</p>	<p>603.3 Mirrors. Mirrors located above lavatories or countertops shall be installed with the bottom edge of the reflecting surface 40 inches (1015 mm) maximum above the finish floor or ground.</p>	<p>Mirrors not located above lavatories or countertops shall be installed with the bottom edge of the reflecting surface 35 inches (890 mm) maximum above the finish floor or ground.</p>	<p>Relocate or add mirror meeting requirements of 603.</p>
<p>No clear floor space for lavatory.</p>	<p>606 Lavatories and Sinks 606.2 Clear Floor Space. A clear floor space complying with 305, positioned for a forward approach, and knee and toe clearance complying with 306 shall be provided.</p>		<p>Toilet room renovation/relocation required to remove barrier.</p>

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<p>Rear wall grab bar is 30" long and does not meet positioning requirements identified in 604.5.2.</p>	<p>604.5.2 Rear Wall. The rear wall grab bar shall be 36 inches (915 mm) long minimum and extend from the centerline of the water closet 12 inches (305 mm) minimum on one side and 24 inches (610 mm) minimum on the other side.</p>	 <p>The diagram illustrates the required placement of a rear wall grab bar. A toilet is shown with a dashed vertical line representing its centerline. A horizontal grab bar is positioned above the toilet. The total length of the grab bar is 36 inches (915 mm). It must extend 12 inches (305 mm) from the centerline to the right and 24 inches (610 mm) to the left. A 'transfer side' is indicated on the left side of the toilet.</p>	<p>Position and length limited by placement of lavatory. Toilet room renovation/relocation required to remove barrier.</p>
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SUPPLEMENTAL PHOTOGRAPHIC GUIDANCE



Curb ramp does not provide landing at top



Cross slope and slope issues throughout turn compromise compliance

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PARKING			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
Parking space designated as accessible is not van accessible.	502.2 Van parking spaces shall be 132 inches (3350 mm) wide minimum EXCEPTION: Van parking spaces shall be permitted to be 96 inches (2440 mm) wide minimum where the access aisle is 96 inches (2440 mm) wide minimum	<p>(a) car (b) van</p>	<p>Modify or relocate parking space to provide compliant van accessible space.</p> <p>Meet all applicable requirements of section 502 to greatest extent possible</p>
There is no marked access aisle for designated accessible parking space.	502.3.1 Width. Access aisles serving car and van parking spaces shall be 60 inches (1525 mm) wide minimum.	<p>16 feet width required for van accessible space and access aisle combined. Access aisle may take up anywhere from be 5-8 feet of required 16' width.</p> <p>Access aisle must be marked to discourage others from parking in aisles.</p>	<p>Modify or relocate parking space to provide compliant van accessible space.</p> <p>Meet all applicable requirements of section 502 to greatest extent possible</p>
Slopes in designated accessible parking spaces vary, up to 7.5%.	502.4 Floor or Ground Surfaces. Parking spaces and access aisles serving them shall comply with 302 (Floor or Ground Surfaces)	<p>Slopes not steeper than 1:48 shall be permitted in parking spaces and access aisles.</p> <p>Access aisles shall be at the same level as the parking spaces they serve. Changes in level are not permitted.</p>	<p>Modify or relocate parking space to provide compliant van accessible space.</p> <p>Meet all applicable requirements of section 502 to greatest extent possible</p>
No "van accessible" sign is in place	502.6 Signs identifying van parking spaces shall contain the designation "van accessible."		Provide sign identifying van parking space.

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Sign is mounted low.	502.6 Signs shall be 60 inches (1525 mm) minimum above the finish ground surface measured to the bottom of the sign.		Post-mount signs; ensure bottom of sign is 60" minimum above surface of parking space
APPROACH TO ENTRANCE			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
Cross slope of accessible route to main entrance up to 5%	403.3 Slope The cross slope of walking surfaces shall not be steeper than 1:48.		Resurface to maintain 1:48 max. cross-slope throughout route.
Running slope of accessible route directly in front of main entrance exceeds 10% for run of 80".	403.3 Slope . The running slope of walking surfaces shall not be steeper than 1:20.		Modify approach to entrance to maintain 1:20 slope throughout route. Where route must exceed 1:20, install ramp meeting all requirements of 405.
Depth of maneuvering clearance at door is 50".	404.2.4 Maneuvering Clearances . Minimum maneuvering clearances at doors and gates shall comply with 404.2.4. Maneuvering clearances shall extend the full width of the doorway and the required latch side or hinge side clearance.	FIGURE 404.2.4.1(a) identifies 60" minimum depth for maneuvering clearance	Modify approach to entrance to provide 60" minimum depth for maneuvering clearance at entrance.

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ROOMS AND SPACES			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
SIGNAGE			
Permanent rooms and spaces are not identified with compliant signage.	216.2 Signage Designations. Interior and exterior signs identifying permanent rooms and spaces shall comply with 703.1, 703.2, and 703.5. Where pictograms are provided as designations of permanent interior rooms and spaces, the pictograms shall comply with 703.6 and shall have text descriptors complying with 703.2 and 703.5.	703.2 Raised Characters 703.3 Braille 703.4 Installation Height and Location 703.5 Visual Characters 703.6 Pictograms	Install compliant signage (216 & 703)
LOBBY			
Counter is slightly high at 36-1/2".	904.4.1 Parallel Approach. A portion of the counter surface that is 36 inches (915 mm) long minimum and 36 inches (915 mm) high maximum above the finish floor shall be provided. A clear floor or ground space complying with 305 shall be positioned for a parallel approach adjacent to the 36 inch (915 mm) minimum length of counter.		Provide service directly in lobby or other appropriate area if needed. Maintain lobby furniture arrangement to maximize ease of parallel approach to counter. Address in future alteration projects.
Matts are not fastened to floor in lobby.	302.1 Exposed edges of matts shall be fastened to floor or ground surfaces and shall have		Affix edges of matts to floor surface or remove matts

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	trim on the entire length of the exposed edge		
RESTROOM FACILITIES			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
WOMEN'S RESTROOM			
Water closet seat height 16-1/2".	604.4 Seats. The seat height of a water closet above the finish floor shall be 17 inches (430 mm) minimum and 19 inches (485 mm) maximum measured to the top of the seat.	Seats shall not be sprung to return to a lifted position.	Raise seat surface to 17" minimum.
Rear wall grab bar 24" long.	604.5.2 Rear Wall. The rear wall grab bar shall be 36 inches (915 mm) long minimum and extend from the centerline of the water closet 12 inches (305 mm) minimum on one side and 24 inches (610 mm) minimum on the other side.		Install compliant grab bar.
Lavatory overlaps water closet clearance.	604.3 Clearance. 604.3.1 Size. Clearance around a water closet shall be 60 inches (1525 mm) minimum measured perpendicular from the side wall and 56 inches (1420 mm) minimum measured perpendicular from the rear wall.		Toilet room renovation/relocation required to remove barrier. Location of lavatory covered by SAFE HARBOR provisions of ADA.

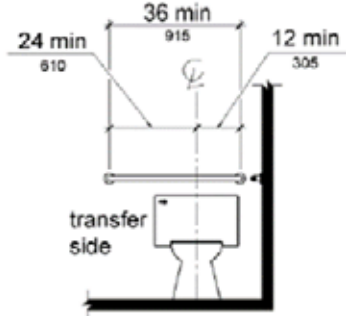
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<p>No audible or visible alarms are in place.</p>	<p>215 Fire Alarm Systems 215.1 General. Where fire alarm systems provide audible alarm coverage, alarms shall comply with 215. EXCEPTION: In existing facilities, visible alarms shall not be required except where an existing fire alarm system is upgraded or replaced, or a new fire alarm system is installed.</p>	<p>215.2 Public and Common Use Areas. Alarms in public use areas and common use areas shall comply with 702. 702 Fire Alarm Systems 702.1 General. Fire alarm systems shall have permanently installed audible and visible alarms complying with NFPA 72 (1999 or 2002 edition) (incorporated by reference, see "Referenced Standards" in Chapter 1), except that the maximum allowable sound level of audible notification appliances complying with section 4-3.2.1 of NFPA 72 (1999 edition) shall have a sound level no more than 110 dB at the minimum hearing distance from the audible appliance. In addition, alarms in guest rooms required to provide communication features shall comply with sections 4-3 and 4-4 of NFPA 72 (1999 edition) or sections 7.4 and 7.5 of NFPA 72 (2002 edition).</p>	<p>Address in planning when existing fire alarm system is upgraded or replaced, or a new fire alarm system is installed.</p>
<p>MEN'S RESTROOM</p>			
<p>Men's restroom is not on an independently usable accessible route from a public entrance.</p>	<p>402.2 Accessible Route Components. Accessible routes shall consist of one or more of the following components: walking surfaces with a running slope not steeper than 1:20, doorways, ramps, curb ramps excluding the flared sides, elevators, and platform lifts. All components of an accessible route shall comply with the applicable requirements of Chapter 4.</p>	<p>Men's restroom is in maintenance area, and cannot be accessed by the public without assistance from city employees.</p>	<p>Provide accessible restroom in independently accessible public area OR Convert Women's restroom to unisex restroom for use by non-employees.</p>
<p>6" maneuvering clearance provided to latch side of door.</p>	<p>404.2.4 Maneuvering Clearances. Minimum maneuvering clearances at doors and gates shall comply with 404.2.4. Maneuvering</p>	<p>FIGURE 404.2.4.1 (c) identifies 12" required on latch side of door.</p>	<p>Remove/Renovate built-in sink area elements on latch side of door.</p>

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	clearances shall extend the full width of the doorway and the required latch side or hinge side clearance.		
Round doorknob in place.	309.4 Operable parts of door hardware shall be 34 inches (865 mm) minimum and 48 inches (1220 mm) maximum above the finish floor or ground and meet operable part requirements of 309.4.		Install lever-handled door hardware.
Lavatory overlaps water closet clearance.	604.3 Clearance. 604.3.1 Size. Clearance around a water closet shall be 60 inches (1525 mm) minimum measured perpendicular from the side wall and 56 inches (1420 mm) minimum measured perpendicular from the rear wall.		Toilet room renovation/relocation required to remove barrier. Location of lavatory covered by SAFE HARBOR provisions of ADA.
There is no side wall grab bar.	604.5 Grab Bars. 604.5.1 Side Wall. The side wall grab bar shall be 42 inches (1065 mm) long minimum, located 12 inches (305 mm) maximum from the rear wall and extending 54 inches (1370 mm) minimum from the rear wall.		Install grab bar.

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<p>There is no rear wall grab bar.</p>	<p>604.5.2 Rear Wall. The rear wall grab bar shall be 36 inches (915 mm) long minimum and extend from the centerline of the water closet 12 inches (305 mm) minimum on one side and 24 inches (610 mm) minimum on the other side.</p>		<p>Install grab bar.</p>
<p>Water closet seat height 16-1/2”.</p>	<p>604.4 Seats. The seat height of a water closet above the finish floor shall be 17 inches (430 mm) minimum and 19 inches (485 mm) maximum measured to the top of the seat.</p>	<p>Seats shall not be sprung to return to a lifted position.</p>	<p>Raise seat surface to 17” minimum.</p>
<p>Lavatory pipes are not insulated.</p>	<p>606.5 Exposed Pipes and Surfaces. Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact.</p>	<p>“There shall be no sharp or abrasive surfaces under lavatories and sinks.”</p>	<p>Insulate pipes.</p>
<p>No visible and audible emergency alert systems in place</p>	<p>215 Fire Alarm Systems 215.1 General. Where fire alarm systems provide audible alarm coverage, alarms shall comply with 215. EXCEPTION: In existing facilities, visible alarms shall not be required except where an existing fire alarm system is upgraded or replaced, or a new fire alarm system is installed.</p>	<p>215.2 Public and Common Use Areas. Alarms in public use areas and common use areas shall comply with 702. 702 Fire Alarm Systems 702.1 General. Fire alarm systems shall have permanently installed audible and visible alarms complying with NFPA 72 (1999 or 2002 edition) (incorporated by reference, see "Referenced Standards" in Chapter 1), except that the maximum allowable sound level of audible notification appliances complying with section 4-3.2.1 of NFPA 72 (1999 edition) shall have a sound level no more than 110 dB at the minimum hearing distance from the audible appliance. In addition, alarms in guest rooms required to provide communication features</p>	<p>Address in planning when existing fire alarm system is upgraded or replaced, or a new fire alarm system is installed.</p>

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		shall comply with sections 4-3 and 4-4 of NFPA 72 (1999 edition) or sections 7.4 and 7.5 of NFPA 72 (2002 edition).	
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SUPPLEMENTAL PHOTOGRAPHIC GUIDANCE



Parking space running slope is excessive (1:48 maximum)



Post-mount signage when designating accessible parking

SUPPLEMENTAL PHOTOGRAPHIC GUIDANCE



Approach would need to be altered to meet slope requirements
Ramp would be required to meet new construction requirements
Landing at door is undersized



Women's restroom should be offered to patrons with disabilities

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PARKING			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
1 accessible parking space does not have sign.	502.6 Identification. Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1.		Provide compliant sign mounted 60" minimum above surface of parking space.
No "van accessible" signage is in place.	502.6 Signs identifying van parking spaces shall contain the designation "van accessible."		Provide at least 1 compliant sign mounted 60" minimum above surface of parking space.
Signage posted low.	502.6 Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.		Provide signage mounted 60" minimum above surface of parking space.
Markings of spaces and access aisles is faded.	502.3.3 Marking. Access aisles shall be marked so as to discourage parking in them.		Repaint spaces and access aisles.
APPROACH TO ENTRANCE			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
Entrance door sticks.	309.4 The force required to activate door and gate hardware shall be 5 pounds (22.2 N) maximum.	Exterior doors are not assigned a maximum weight but should be readily accessible to and usable by people with disabilities.	Repair door so that it is operable with the minimum amount of force possible.

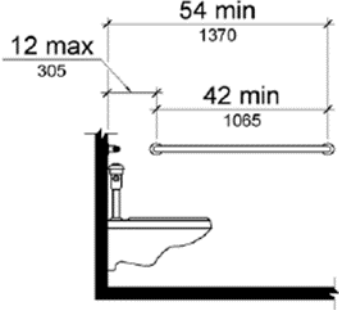
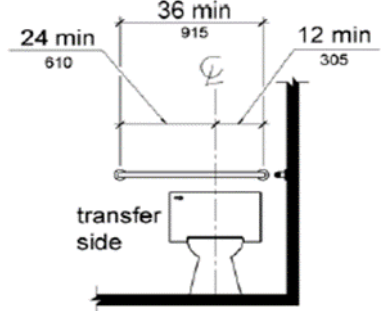
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ROOMS AND SPACES			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
There is no accessible route to driving range, 1 st Tee or other areas of facility addressed in 1006.2.	<p>1006 Golf Facilities 1006.2 Accessible Routes. Accessible routes serving teeing grounds, practice teeing grounds, putting greens, practice putting greens, teeing stations at driving ranges, course weather shelters, golf car rental areas, bag drop areas, and course toilet rooms shall comply with Chapter 4 and shall be 48 inches (1220 mm) wide minimum.</p> <p>238.2.2 Putting Greens/238.2.3 Weather Shelters. Putting greens and weather shelters shall be designed and constructed so that a golf car can enter and exit the putting green.</p> <p>238.3 Practice Putting Greens, Practice Teeing Grounds, and Teeing Stations at Driving Ranges. At least 5 percent, but no fewer than one, of practice putting greens, practice teeing grounds, and teeing stations at driving ranges shall be designed and constructed so that a golf car can enter and exit the practice putting greens, practice teeing grounds, and teeing stations at driving ranges.</p>	<p>238.2.1 Teeing Grounds. Where one teeing ground is provided for a hole, the teeing ground shall be designed and constructed so that a golf car can enter and exit the teeing ground. Where two teeing grounds are provided for a hole, the forward teeing ground shall be designed and constructed so that a golf car can enter and exit the teeing ground. EXCEPTION: In existing golf courses, the forward teeing ground shall not be required to be one of the teeing grounds on a hole designed and constructed so that a golf car can enter and exit the teeing ground where compliance is not feasible due to terrain.</p>	<p>Option 1: Connect identified areas of facility with accessible routes meeting requirements of Chapter 4.</p> <p>Option 2: Procure accessible golf cart, located on an accessible route from parking. Adapt course policy to ensure cart access to greens, teeing stations, etc.</p>

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<p>Service counters are 39 and 42 inches high.</p>	<p>904.4.1 Sales and Service Counters: Parallel Approach. A portion of the counter surface that is 36 inches (915 mm) long minimum and 36 inches (915 mm) high maximum above the finish floor shall be provided. A clear floor or ground space complying with 305 shall be positioned for a parallel approach adjacent to the 36 inch (915 mm) minimum length of counter.</p>	<p>EXCEPTION: Where the provided counter surface is less than 36 inches (915 mm) long, the entire counter surface shall be 36 inches (915 mm) high maximum above the finish floor.</p>	<p>Install service counters meeting requirements of 904.4.1. If surface provided is work surface, ensure counter height is no higher than 34" and provides for a forward approach as identified in 904.4.2.</p>
<p>RESTROOM FACILITIES</p>			
<p><i>EXISTING CONDITION</i></p>	<p><i>2010 ADA STANDARD CITATION</i></p>	<p><i>ADDITIONAL GUIDANCE</i></p>	<p><i>RECOMMENDATIONS</i></p>
<p>MEN'S RESTROOM</p>			
<p>Wall mounted dispensers protrude into circulation path.</p>	<p>307 Protruding Objects 307.2 Protrusion Limits. Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.</p>		<p>Replace/reposition dispensers to eliminate protruding objects.</p>
<p>Pipe surfaces beneath lavatories exposed.</p>	<p>606.5 Exposed Pipes and Surfaces. Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.</p>		<p>Fully insulate pipes.</p>

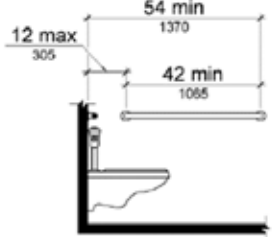
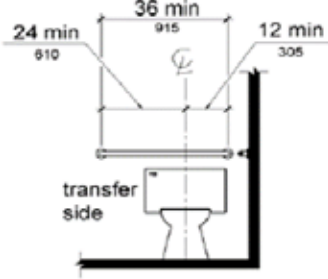
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<p>Side wall grab bar is 38" long.</p>	<p>604.5 Grab Bars. 604.5.1 Side Wall. The side wall grab bar shall be 42 inches (1065 mm) long minimum, located 12 inches (305 mm) maximum from the rear wall and extending 54 inches (1370 mm) minimum from the rear wall.</p>		<p>Replace grab bar.</p>
<p>Rear wall grab bar is 32" long.</p>	<p>604.5.2 Rear Wall. The rear wall grab bar shall be 36 inches (915 mm) long minimum and extend from the centerline of the water closet 12 inches (305 mm) minimum on one side and 24 inches (610 mm) minimum on the other side.</p>		
<p>Grab bars are mounted with gripping surfaces 37" above finish floor.</p>	<p>609.4 Position of Grab Bars. Grab bars shall be installed in a horizontal position, 33 inches (840 mm) minimum and 36 inches (915 mm) maximum above the finish floor measured to the top of the gripping surface. The height of the lower grab bar on the back wall of a bathtub shall comply with 607.4.1.1 or 607.4.2.1.</p>		<p>When replacing grab bars, install with gripping surface between 33-36 inches above finish floor.</p>
<p>There is no door pull on exterior of toilet compartment door.</p>	<p>604.8.1.2 Toilet Compartment Doors. A door pull complying with 404.2.7 shall be placed on both sides of the door near the latch.</p>		<p>Install door pull.</p>

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<p>No visible and audible emergency alert systems in place</p>	<p>215 Fire Alarm Systems 215.1 General. Where fire alarm systems provide audible alarm coverage, alarms shall comply with 215. EXCEPTION: In existing facilities, visible alarms shall not be required except where an existing fire alarm system is upgraded or replaced, or a new fire alarm system is installed.</p>	<p>215.2 Public and Common Use Areas. Alarms in public use areas and common use areas shall comply with 702. 702 Fire Alarm Systems 702.1 General. Fire alarm systems shall have permanently installed audible and visible alarms complying with NFPA 72 (1999 or 2002 edition) (incorporated by reference, see "Referenced Standards" in Chapter 1), except that the maximum allowable sound level of audible notification appliances complying with section 4-3.2.1 of NFPA 72 (1999 edition) shall have a sound level no more than 110 dB at the minimum hearing distance from the audible appliance. In addition, alarms in guest rooms required to provide communication features shall comply with sections 4-3 and 4-4 of NFPA 72 (1999 edition) or sections 7.4 and 7.5 of NFPA 72 (2002 edition).</p>	<p>Address in planning and procurement when existing fire alarm system is upgraded or replaced, or a new fire alarm system is installed.</p>
<p>WOMEN'S RESTROOM</p>			
<p>Wall mounted dispensers protrude into circulation path.</p>	<p>307 Protruding Objects 307.2 Protrusion Limits. Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path. EXCEPTION: Handrails shall be permitted to protrude 4 1/2 inches (115 mm) maximum.</p>	<p>The diagram illustrates a person standing next to a wall-mounted dispenser. The dispenser is shown as a rectangular object protruding from the wall. A dimension line indicates the width of the dispenser is 4 inches (100 mm). Another dimension line shows the height of the dispenser is X > 27 (685 mm) and X <= 80 (2030 mm). The dispenser is shown protruding 4 inches (100 mm) into the circulation path.</p>	<p>Replace/reposition dispensers to eliminate protruding objects.</p>

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<p>Pipe surfaces beneath lavatories exposed.</p>	<p>606.5 Exposed Pipes and Surfaces. Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.</p>		<p>Fully insulate pipes.</p>
<p>Side wall grab bar is 38" long.</p>	<p>604.5 Grab Bars. 604.5.1 Side Wall. The side wall grab bar shall be 42 inches (1065 mm) long minimum, located 12 inches (305 mm) maximum from the rear wall and extending 54 inches (1370 mm) minimum from the rear wall.</p>		<p>Replace grab bar.</p>
<p>Rear wall grab bar is 32" long.</p>	<p>604.5.2 Rear Wall. The rear wall grab bar shall be 36 inches (915 mm) long minimum and extend from the centerline of the water closet 12 inches (305 mm) minimum on one side and 24 inches (610 mm) minimum on the other side.</p>		
<p>Grab bars are mounted with gripping surfaces 37" above finish floor.</p>	<p>609.4 Position of Grab Bars. Grab bars shall be installed in a horizontal position, 33 inches (840 mm) minimum and 36 inches (915 mm) maximum above the finish floor measured to the top of the gripping surface. The height of the lower grab bar on the back wall of a bathtub shall comply with 607.4.1.1 or 607.4.2.1.</p>		<p>When replacing grab bars, install with gripping surface between 33-36 inches above finish floor.</p>

CITY OF GARDNER ADA SELF-EVALUATION AND TRANSITION PLAN: FACILITY ASSESSMENT REPORT – SEPTEMBER 1, 2016
GARDNER GOLF COURSE CLUB HOUSE 15820 S. GARDNER ROAD

<p>There is no door pull on exterior of toilet compartment door.</p>	<p>604.8.1.2 Toilet Compartment Doors. A door pull complying with 404.2.7 shall be placed on both sides of the door near the latch.</p>		<p>Install door pull.</p>
<p>No visible and audible emergency alert systems in place</p>	<p>215 Fire Alarm Systems 215.1 General. Where fire alarm systems provide audible alarm coverage, alarms shall comply with 215. EXCEPTION: In existing facilities, visible alarms shall not be required except where an existing fire alarm system is upgraded or replaced, or a new fire alarm system is installed.</p>	<p>215.2 Public and Common Use Areas. Alarms in public use areas and common use areas shall comply with 702. 702 Fire Alarm Systems 702.1 General. Fire alarm systems shall have permanently installed audible and visible alarms complying with NFPA 72 (1999 or 2002 edition) (incorporated by reference, see "Referenced Standards" in Chapter 1), except that the maximum allowable sound level of audible notification appliances complying with section 4-3.2.1 of NFPA 72 (1999 edition) shall have a sound level no more than 110 dB at the minimum hearing distance from the audible appliance. In addition, alarms in guest rooms required to provide communication features shall comply with sections 4-3 and 4-4 of NFPA 72 (1999 edition) or sections 7.4 and 7.5 of NFPA 72 (2002 edition).</p>	<p>Address in planning and procurement when existing fire alarm system is upgraded or replaced, or a new fire alarm system is installed.</p>

CITY OF GARDNER ADA SELF-EVALUATION AND TRANSITION PLAN: FACILITY ASSESSMENT REPORT – SEPTEMBER 1, 2016
GARDNER GOLF COURSE CLUB HOUSE 15820 S. GARDNER ROAD

SUPPLEMENTAL PHOTOGRAPHIC GUIDANCE



Yellow arrow: Install compliant signage
Raise signage to 60" minimum above parking space surface
Red arrow: general direction of accessible route to 1st tee/range



Restrooms provide adequate space and accessible features
Storage compromises required clear floor space at water closet

CITY OF GARDNER ADA SELF-EVALUATION AND TRANSITION PLAN: FACILITY ASSESSMENT REPORT – SEPTEMBER 1, 2016
 GARDNER JUNCTION PARK 32500 U.S. 56 HWY

PARKING			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
Paint is worn in parking space and access aisle.	502.3.3 Marking. Access aisles shall be marked so as to discourage parking in them.		Repaint space markings (edges defining parking space) and access aisle markings
ROOMS AND SPACES			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
TRAIL: Gaps present at some displays and route edges that border walls.	302.3 Openings. Openings in floor or ground surfaces shall not allow passage of a sphere more than 1/2-inch (13 mm) diameter.		Fill gaps larger than 1/2" diameter.

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SUPPLEMENTAL PHOTOGRAPHIC GUIDANCE



Example of gaps along routes that should be mitigated



Excellent use of space to provide accessibility to all users.

**CITY OF GARDNER ADA SELF-EVALUATION AND TRANSITION PLAN: FACILITY ASSESSMENT REPORT – SEPTEMBER 1, 2016
GARDNER LAKE PARK 29807 W. 152ND STREET**

PARKING			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
No accessible parking is provided at two shelters below the dam.	208 Parking Spaces 208.1 General. Where parking spaces are provided, parking spaces shall be provided in accordance with 208.	1 van space is required	Provide van accessible parking space and access aisle with compliant signage.
Van-accessible parking space near dock is 10' (120") wide.	502.2 Van parking spaces shall be 132 inches (3350 mm) wide minimum EXCEPTION: Van parking spaces shall be permitted to be 96 inches (2440 mm) wide minimum where the access aisle is 96 inches (2440 mm) wide minimum	<p>(a) car (b) van</p>	Effective width is 132", as there are no parking spaces adjacent to accessible parking space/access aisle. Recommend citing "equivalent facilitation" based on available concrete pad space.
No accessible parking sign provided.	502.6 Identification. Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1.		Install sign, mounted with bottom 60" minimum above ground surface of parking space.
No "van accessible" sign provided.	502.6 Signs identifying van parking spaces shall contain the designation "van accessible."		Install sign, mounted with bottom 60" minimum above ground surface of parking space.
OTHER AREAS OR ELEMENTS			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
There is no accessible route to shelters or fire pit below dam.	206.2.2 Within a Site. At least one accessible route shall connect accessible buildings, accessible facilities, accessible elements, and	EXCEPTION: An accessible route shall not be required between accessible buildings, accessible facilities, accessible elements, and accessible spaces if the only means	Provide accessible route to shelters and fire pit.

CITY OF GARDNER ADA SELF-EVALUATION AND TRANSITION PLAN: FACILITY ASSESSMENT REPORT – SEPTEMBER 1, 2016
 GARDNER LAKE PARK 29807 W. 152ND STREET

	accessible spaces that are on the same site.	of access between them is a vehicular way not providing pedestrian access.	
There are some openings in ground surfaces exceeding ½” at the connection to the dock and between dock concrete blocks.	302.3 Openings. Openings in floor or ground surfaces shall not allow passage of a sphere more than ½ inch (13 mm) diameter		Fill gaps that are greater than ½”.
RESTROOM FACILITIES			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
Provided portable toilet room does not meet ADAAG standards.	213 Toilet Facilities and Bathing Facilities 213.1 General. Where toilet facilities and bathing facilities are provided, they shall comply with 213		Provide compliant portable toilet room, positioned on an accessible route.

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SUPPLEMENTAL PHOTOGRAPHIC GUIDANCE



Accessible parking and route to this shelter needed here



Provide accessible parking signage

Lines identify space that is slightly too small to meet ADAAG

Actual usable concrete space is 16 feet wide (equivalent facilitation)

SUPPLEMENTAL PHOTOGRAPHIC GUIDANCE



Route to boat dock has gaps
Strongly recommend edge protection along route to boat dock



Example of gaps on route to boat dock

SUPPLEMENTAL PHOTOGRAPHIC GUIDANCE



Replace with accessible portable toilet room

Position on accessible route

**CITY OF GARDNER ADA SELF-EVALUATION AND TRANSITION PLAN: FACILITY ASSESSMENT REPORT – SEPTEMBER 1, 2016
GARDNER POLICE BUILDING 440 E. MAIN STREET**

PARKING			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
Employee/Police Vehicle Only parking is not clearly identified, making it unclear the number of accessible spaces should be provided.	208.2 Minimum Number. Parking spaces complying with 502 shall be provided in accordance with Table 208.2.	26 spaces exist. If all 26 spaces are for public use, then 2 accessible spaces are required. If fewer spaces are designated for public use based on Gardner Police Department need, the existing 1 accessible space meets the scoping requirement of ADAAG.	Identify at least 3 spaces as either "Employee Only" or "Police Vehicle Only".
No van accessible space provided.	502.2 Van parking spaces shall be 132 inches (3350 mm) wide minimum EXCEPTION: Van parking spaces shall be permitted to be 96 inches (2440 mm) wide minimum where the access aisle is 96 inches (2440 mm) wide minimum		Provide access aisle that is 96" wide minimum.
No "van accessible" sign is provided.	502.6 Signs identifying van parking spaces shall contain the designation "van accessible."		Install "van accessible" sign
Sign is mounted at 53" above ground surface of parking space.	502.6 Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.		Raise sign so that bottom of sign is 60" minimum above parking space ground surface.

**CITY OF GARDNER ADA SELF-EVALUATION AND TRANSITION PLAN: FACILITY ASSESSMENT REPORT – SEPTEMBER 1, 2016
GARDNER POLICE BUILDING 440 E. MAIN STREET**

APPROACH TO ENTRANCE			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
Handrails for ramp: top of gripping surfaces slightly low (33-1/4")	505.4 Height. Top of gripping surfaces of handrails shall be 34 inches (865 mm) minimum and 38 inches (965 mm) maximum vertically above ramp surfaces. Handrails shall be at a consistent height above ramp surfaces.		When handrails are replaced, ensure proper mounting height.
There is no handrail extension at bottom of ramp run.	505.10.1 Top and Bottom Extension at Ramps. Ramp handrails shall extend horizontally above the landing for 12 inches (305 mm) minimum beyond the top and bottom of ramp runs. Extensions shall return to a wall, guard, or the landing surface, or shall be continuous to the handrail of an adjacent ramp run.		Modify handrail.
ROOMS AND SPACES			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
Lobby service counter is 41" high.	904.4 Sales and Service Counters. Sales counters and service counters shall comply with 904.4.1 or 904.4.2.	The accessible portion of the counter top shall extend the same depth as the sales or service counter top.	Provide service counter meeting space and approach requirements of 904.4.1 or 904.4.2

CITY OF GARDNER ADA SELF-EVALUATION AND TRANSITION PLAN: FACILITY ASSESSMENT REPORT – SEPTEMBER 1, 2016
GARDNER POLICE BUILDING 440 E. MAIN STREET

<p>There are no mobility features required by Title 2 of the ADA provided in holding cell.</p>	<p>28 CFR 35.151 New construction and alterations (k) Detention and correctional facilities. (2) Alterations to detention and correctional facilities. Alterations to jails, prisons, and other detention and correctional facilities shall comply with the 2010 Standards except that public entities shall provide accessible mobility features complying with section 807.2 of the 2010 Standards for a minimum of 3%, but no fewer than one, of the total number of cells being altered until at least 3%, but no fewer than one, of the total number of cells in a facility shall provide mobility features complying with section 807.2.</p>	<p>The following are the ADAAG requirements for cells meeting needs of those with mobility impairments:</p> <p>807.2.1 Turning Space. Turning space complying with 304 shall be provided within the cell. 807.2.2 Benches. Where benches are provided, at least one bench shall comply with 903. 807.2.3 Beds. Where beds are provided, clear floor space complying with 305 shall be provided on at least one side of the bed. The clear floor space shall be positioned for parallel approach to the side of the bed. 807.2.4 Toilet and Bathing Facilities. Toilet facilities or bathing facilities that are provided as part of a cell shall comply with 603. Where provided, no fewer than one water closet, one lavatory, and one bathtub or shower shall comply with the applicable requirements of 603 through 610.</p>	<p>Modify cell to meet requirements.</p>
<p>Bench in cell does not meet ADAAG requirements.</p>	<p>903.3 Size. Benches shall have seats that are 42 inches (1065 mm) long minimum and 20 inches (510 mm) deep minimum and 24 inches (610 mm) deep maximum.</p>		<p>Provide compliant bench.</p>
<p>Bench in holding cell does not meet ADAAG requirements.</p>	<p>903 Benches 903.2 Clear Floor or Ground Space. Clear floor or ground space complying with 305 shall be provided and shall be positioned at the end of the bench seat and parallel to the short axis of the bench.</p>		<p>Provide clear floor space at end of bench.</p>

**CITY OF GARDNER ADA SELF-EVALUATION AND TRANSITION PLAN: FACILITY ASSESSMENT REPORT – SEPTEMBER 1, 2016
GARDNER POLICE BUILDING 440 E. MAIN STREET**

RESTROOM FACILITIES			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
No accessible features or spaces are available in restrooms.	213 Toilet Facilities and Bathing Facilities 213.1 General. Where toilet facilities and bathing facilities are provided, they shall comply with 213. 213.2 Toilet Rooms and Bathing Rooms. Where toilet rooms are provided, each toilet room shall comply with 603.	EXCEPTIONS: 1. In alterations where it is technically infeasible to comply with 603, altering existing toilet or bathing rooms shall not be required where a single unisex toilet room or bathing room complying with 213.2.1 is provided and located in the same area and on the same floor as existing inaccessible toilet or bathing rooms.	Modify restrooms to provide single compliant unisex restroom.
No compliant signage for restrooms.	216.2 Designations. Interior and exterior signs identifying permanent rooms and spaces shall comply with 703.1, 703.2, and 703.5.	Where pictograms are provided as designations of permanent interior rooms and spaces, the pictograms shall comply with 703.6 and shall have text descriptors complying with 703.2 and 703.5	Install compliant signage, mounted adjacent to latch side of door.
Round knobs are in place on doors.	309.4 Operation. Door and gate hardware shall be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist		Replace with lever-handled door hardware.
No visible and audible emergency alert systems in place	215 Fire Alarm Systems 215.1 General. Where fire alarm systems provide audible alarm coverage, alarms shall comply with 215. EXCEPTION: In existing facilities, visible alarms shall not be required except where an existing fire alarm system is upgraded or replaced, or a new fire alarm system is installed.	215.2 Public and Common Use Areas. Alarms in public use areas and common use areas shall comply with 702. 702 Fire Alarm Systems 702.1 General. Fire alarm systems shall have permanently installed audible and visible alarms complying with NFPA 72 (1999 or 2002 edition) (incorporated by reference, see "Referenced Standards" in Chapter 1), except that the maximum allowable sound level of audible notification appliances complying with section 4-3.2.1 of NFPA 72 (1999 edition) shall have a	Address in planning and procurement when existing fire alarm system is upgraded or replaced, or a new fire alarm system is installed.

CITY OF GARDNER ADA SELF-EVALUATION AND TRANSITION PLAN: FACILITY ASSESSMENT REPORT – SEPTEMBER 1, 2016
GARDNER POLICE BUILDING 440 E. MAIN STREET

		sound level no more than 110 dB at the minimum hearing distance from the audible appliance. In addition, alarms in guest rooms required to provide communication features shall comply with sections 4-3 and 4-4 of NFPA 72 (1999 edition) or sections 7.4 and 7.5 of NFPA 72 (2002 edition).	
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CITY OF GARDNER ADA SELF-EVALUATION AND TRANSITION PLAN: FACILITY ASSESSMENT REPORT – SEPTEMBER 1, 2016
GARDNER POLICE BUILDING 440 E. MAIN STREET

SUPPLEMENTAL PHOTOGRAPHIC GUIDANCE



Accessible parking well positioned; raise signage and add van sign



Identify reserved employee/emergency vehicle parking

CITY OF GARDNER ADA SELF-EVALUATION AND TRANSITION PLAN: FACILITY ASSESSMENT REPORT – SEPTEMBER 1, 2016
MEADOWBROOK PARK 311 W. MAIN STREET

PARKING AND APPROACH			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
No accessible parking is provided.	208.2 Minimum Number. Parking spaces complying with 502 shall be provided in accordance with Table 208.2 except as required by 208.2.1, 208.2.2, and 208.2.3.		Add 1 van accessible parking space with access aisle and signage. Provide connection to accessible route to park.
Ground surfaces in parking area are gravel and unlikely to meet standards for surfaces.	502.4 Floor or Ground Surfaces. Parking spaces and access aisles serving them shall comply with 302. Changes in level are not permitted.	Surfaces must be firm, stable, and slip resistant.	Provide compliant surface in space and access aisle
There is no accessible route from parking to park elements and features such as play areas.	402.2 Accessible Route Components. Accessible routes shall consist of one or more of the following components: walking surfaces with a running slope not steeper than 1:20, doorways, ramps, curb ramps excluding the flared sides, elevators, and platform lifts. All components of an accessible route shall comply with the applicable requirements of Ch. 4.		Provide accessible route to all park elements and features that connects with accessible parking.
PLAY AREAS			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
Accessible routes not provided to play components.	206.2.17.1 Ground Level and Elevated Play Components. At least one accessible route shall be provided within the play area. The accessible route shall connect ground level play components required to comply with 240.2.1 and		Provide accessible route to one of each type of ground level play component and access point(s) of composite play structure containing elevated play components.

CITY OF GARDNER ADA SELF-EVALUATION AND TRANSITION PLAN: FACILITY ASSESSMENT REPORT – SEPTEMBER 1, 2016
MEADOWBROOK PARK 311 W. MAIN STREET

	elevated play components required to comply with 240.2.2, including entry and exit points of the play components.		
Compliant ground surfaces are not provided in play areas	1008.2.6 Ground Surfaces. Ground surfaces on accessible routes, clear floor or ground spaces, and turning spaces shall comply with 1008.2.6.		Replace mulch with permanent surface that comply with ASTM F 1951
Compliant ground surfaces are not provided in play areas.	1008.2.6.1 Accessibility. Ground surfaces shall comply with ASTM F 1951 (incorporated by reference, see "Referenced Standards" in Chapter 1). Ground surfaces shall be inspected and maintained regularly and frequently to ensure continued compliance with ASTM F 1951.		Replace mulch with permanent surface that comply with ASTM F 1951
Compliant ground surfaces are not provided in play areas.	1008.2.6.2 Use Zones. Ground surfaces located within use zones shall comply with ASTM F 1292 (1999 edition or 2004 edition) (incorporated by reference, see "Referenced Standards" in Ch. 1).		In use zones, replace mulch with permanent surface that provides impact attenuation (ASTM 1292) as well as compliance with ASTM F 1951
Transfer steps within play structure connecting elevated play components taper, compromising compliance with 1008.3.2.1.	1008.3.2.1 Transfer Steps Size. Transfer steps shall have level surfaces 14 inches (355 mm) deep minimum and 24 inches (610 mm) wide minimum.		Replace equipment

PLAY AREA SUMMARY

PLAY ARE CONTAINS COMPOSITE PLAY STRUCTURE

Number of Elevated Play Components: 7

Number of Elevated Play Components Connected by Ramps: 0

Number of Elevated Play Components Connected by Transfer Systems: 3

Number of Ground Level Play Components: 15

Types of Ground Level Play Components:

- . 4 Rocking
- . 2 Vertical Hang
- . 1 Balance Course
- . 3 Lily Pads
- . 1 Slide
- . 2 Swings
- . 2 Toddler Swings

Number of Ground Level Play Components on Accessible Route: 0

Types of Ground Level Play Components on Accessible Route: 0

Number of Ground Level Play Components Required to be on Accessible Route: 7 (one of each type)

SUPPLEMENTAL PHOTOGRAPHIC GUIDANCE



Recommended placement of accessible parking
Tie into accessible route leading to playground



This shelter is connected by an accessible route from street
Route not connected to parking facilities

CITY OF GARDNER ADA SELF-EVALUATION AND TRANSITION PLAN: FACILITY ASSESSMENT REPORT – SEPTEMBER 1, 2016
MUNICIPAL AIRPORT PARK 31905 W. 175TH STREET

PARKING AND APPROACH			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
There is no accessible route from parking to play areas, small basketball court, or BBQ pits at shelter.	402.2 Accessible Route Components. Accessible routes shall consist of one or more of the following components: walking surfaces with a running slope not steeper than 1:20, doorways, ramps, curb ramps excluding the flared sides, elevators, and platform lifts. All components of an accessible route shall comply with the applicable requirements of Ch. 4.		Provide accessible route to small basketball court, and play areas that connects with accessible parking. Provide at least 1 BBQ pit on accessible route.
PLAY AREAS			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
Accessible routes not provided to play components.	206.2.17.1 Ground Level and Elevated Play Components. At least one accessible route shall be provided within the play area. The accessible route shall connect ground level play components required to comply with 240.2.1 and elevated play components required to comply with 240.2.2, including entry and exit points of the play components.		Provide accessible route to one of each type of ground level play component and access point(s) of composite play structure containing elevated play components.
Compliant ground surfaces are not provided in play areas	1008.2.6 Ground Surfaces. Ground surfaces on accessible routes, clear floor or ground spaces, and turning spaces shall comply with 1008.2.6.		Replace mulch with permanent surface that comply with ASTM F 1951

CITY OF GARDNER ADA SELF-EVALUATION AND TRANSITION PLAN: FACILITY ASSESSMENT REPORT – SEPTEMBER 1, 2016
MUNICIPAL AIRPORT PARK 31905 W. 175TH STREET

Compliant ground surfaces are not provided in play areas	1008.2.6.1 Accessibility. Ground surfaces shall comply with ASTM F 1951 (incorporated by reference, see "Referenced Standards" in Chapter 1). Ground surfaces shall be inspected and maintained regularly and frequently to ensure continued compliance with ASTM F 1951.		Replace mulch with permanent surface that comply with ASTM F 1951
Compliant ground surfaces are not provided in play areas	1008.2.6.2 Use Zones. Ground surfaces located within use zones shall comply with ASTM F 1292 (1999 edition or 2004 edition) (incorporated by reference, see "Referenced Standards" in Ch. 1).		In use zones, replace mulch with permanent surface that provides impact attenuation (ASTM 1292) as well as compliance with ASTM F 1951

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PLAY AREA SUMMARY

PLAYGROUND CONTAINS GROUND LEVEL CLIMBER AND SWINGS

Number of Elevated Play Components: 0

Number of Elevated Play Components Connected by Ramps: N/A

Number of Elevated Play Components Connected by Transfer Systems: N/A

Number of Ground Level Play Components: 6

Types of Ground Level Play Components:

- 3 Swings
- 2 Toddler Swings
- 1 Climber

Number of Ground Level Play Components on Accessible Route: 0

Types of Ground Level Play Components on Accessible Route: 0

Number of Ground Level Play Components Required to be on Accessible Route: 3 (one of each type)

SUPPLEMENTAL PHOTOGRAPHIC GUIDANCE



Example of BBQ that can be provided on accessible route
Solutions are moving BBQ or installing small firm ground surface

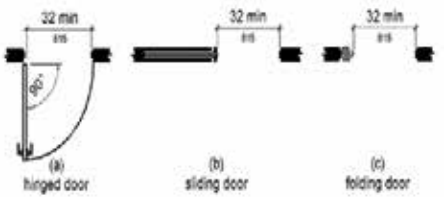


Example of existing play area surfaces

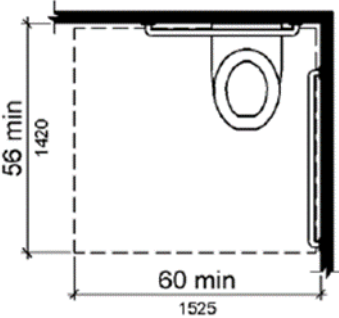
**CITY OF GARDNER ADA SELF-EVALUATION AND TRANSITION PLAN: FACILITY ASSESSMENT REPORT – SEPTEMBER 1, 2016
MUNICIPAL AIRPORT TERMINAL BUILDING AND MAINTENANCE SHOP 31905 W. 175TH STREET**

PARKING			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
No parking signage is in place.	502.6 Identification. Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1.		Provide compliant sign mounted 60" minimum above surface of parking space.
No "van accessible" signage is in place.	502.6 Signs identifying van parking spaces shall contain the designation "van accessible."		Provide compliant sign mounted 60" minimum above surface of parking space.
APPROACH TO ENTRANCE			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
No accessible sign at accessible entrance.	216.6 Entrances. Where not all entrances comply with 404, entrances complying with 404 shall be identified by the International Symbol of Accessibility complying with 703.7.2.1.	"Directional signs complying with 703.5 that indicate the location of the nearest entrance complying with 404 shall be provided at entrances that do not comply with 404." Directional signage is in place at the inaccessible entrance.	Provide sign.
Threshold is in excess of 1-1/2".	404.2.5 Thresholds. Thresholds, if provided at doorways, shall be 1/2 inch (13 mm) high maximum.	Raised thresholds and changes in level at doorways shall comply with 302 and 303.	Mitigate change in level at threshold.
Loose matt on inside of entry door.	302.1 Exposed edges of matts shall be fastened to floor or ground surfaces and shall have trim on the entire length of the exposed edge		Affix edges of matt to floor or remove matt.

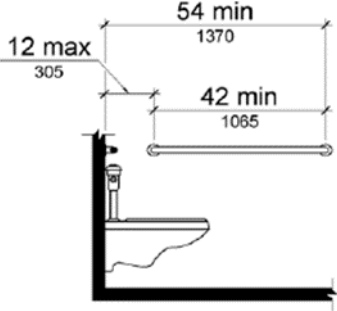
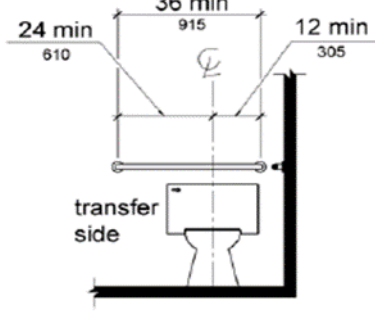
**CITY OF GARDNER ADA SELF-EVALUATION AND TRANSITION PLAN: FACILITY ASSESSMENT REPORT – SEPTEMBER 1, 2016
MUNICIPAL AIRPORT TERMINAL BUILDING AND MAINTENANCE SHOP 31905 W. 175TH STREET**

ROOMS AND SPACES			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
Permanent rooms and spaces are not identified with compliant signage.	216.2 Signage Designations. Interior and exterior signs identifying permanent rooms and spaces shall comply with 703.1, 703.2, and 703.5. Where pictograms are provided as designations of permanent interior rooms and spaces, the pictograms shall comply with 703.6 and shall have text descriptors complying with 703.2 and 703.5.	703.2 Raised Characters 703.3 Braille 703.4 Installation Height and Location 703.5 Visual Characters 703.6 Pictograms	Install compliant signage (216 & 703)
Round knobs on interior doors.	309.4 Operation. Door and gate hardware shall be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist		Replace with lever-handled door hardware.
RESTROOM FACILITIES			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
INTERIOR RESTROOM			
Door to restroom is 29" wide.	404 Doors, Doorways, and Gates 404.2.3 Clear Width. Door openings shall provide a clear width of 32 inches (815 mm) minimum		Widen door to 32" minimum

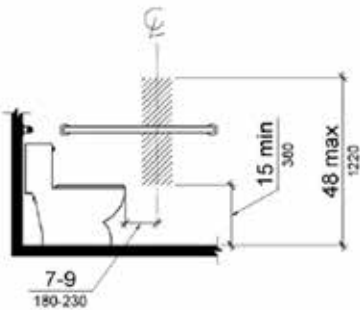
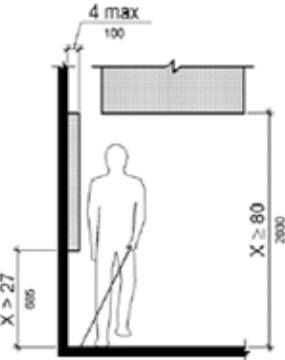
CITY OF GARDNER ADA SELF-EVALUATION AND TRANSITION PLAN: FACILITY ASSESSMENT REPORT – SEPTEMBER 1, 2016
MUNICIPAL AIRPORT TERMINAL BUILDING AND MAINTENANCE SHOP 31905 W. 175TH STREET

<p>Insufficient space in restroom to provide accessible features.</p>	<p>213 Toilet Facilities and Bathing Facilities 213.1 General. Where toilet facilities and bathing facilities are provided, they shall comply with</p>	<p>213.2 Toilet Rooms and Bathing Rooms. Where toilet rooms are provided, each toilet room shall comply with 603. EXCEPTIONS: 1. In alterations where it is technically infeasible to comply with 603, altering existing toilet or bathing rooms shall not be required where a single unisex toilet room or bathing room complying with 213.2.1 is provided and located in the same area and on the same floor as existing inaccessible toilet or bathing rooms.</p>	<p>Modify restroom to provide single compliant unisex restroom.</p> <p>Extensive renovation required to meet standard.</p>
<p>EXTERIOR RESTROOM</p>			
<p>There is a 6 inch step up into restroom.</p>	<p>303.2 Changes in level greater than 1/2 inch (13 mm) high shall be ramped, and shall comply with 405 or 406.</p>		<p>Ramp approach with level landing providing maneuvering clearance at door.</p>
<p>Mirror reflecting surface mounted at 51" above finish floor.</p>	<p>603.3 Mirrors. Mirrors located above lavatories or countertops shall be installed with the bottom edge of the reflecting surface 40 inches (1015 mm) maximum above the finish floor or ground.</p>	<p>Mirrors not located above lavatories or countertops shall be installed with the bottom edge of the reflecting surface 35 inches (890 mm) maximum above the finish floor or ground.</p>	<p>Lower mirror or provide mirror in other location with bottom of reflecting surface no higher than 40" above finish floor.</p>
<p>Lavatory impedes on CFS at water closet</p>	<p>604.3 Clearance. 604.3.1 Size. Clearance around a water closet shall be 60 inches (1525 mm) minimum measured perpendicular from the side wall and 56 inches (1420 mm) minimum measured perpendicular from the rear wall.</p>	 <p>The diagram shows a top-down view of a water closet. A dashed rectangle indicates the required clearances. The width of the clearances is labeled as 60 min (1525 mm). The depth of the clearances is labeled as 56 min (1420 mm). The toilet fixture is shown within the clearances.</p>	<p>Design allowed under 1991 ADAAG and is covered by ADA SAFE HARBOR provisions.</p>

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<p>There is no side wall grab bar.</p>	<p>604.5 Grab Bars. 604.5.1 Side Wall. The side wall grab bar shall be 42 inches (1065 mm) long minimum, located 12 inches (305 mm) maximum from the rear wall and extending 54 inches (1370 mm) minimum from the rear wall.</p>		<p>Install grab bar.</p>
<p>There is no rear wall grab bar.</p>	<p>604.5.2 Rear Wall. The rear wall grab bar shall be 36 inches (915 mm) long minimum and extend from the centerline of the water closet 12 inches (305 mm) minimum on one side and 24 inches (610 mm) minimum on the other side.</p>		<p>Install grab bar.</p>
<p>Flush controls are on wall side of water closet.</p>	<p>604.6 Flush Controls. Flush controls shall be hand operated or automatic. Hand operated flush controls shall comply with 309. Flush controls shall be located on the open side of the water closet except in ambulatory accessible compartments complying with 604.8.2.</p>		<p>Provide flush control on open side of water closet.</p>

**CITY OF GARDNER ADA SELF-EVALUATION AND TRANSITION PLAN: FACILITY ASSESSMENT REPORT – SEPTEMBER 1, 2016
MUNICIPAL AIRPORT TERMINAL BUILDING AND MAINTENANCE SHOP 31905 W. 175TH STREET**

<p>Toilet paper dispenser is mounted adjacent to water closet seat.</p>	<p>604.7 Dispensers. Toilet paper dispensers shall comply with 309.4 and shall be 7 inches (180 mm) minimum and 9 inches (230 mm) maximum in front of the water closet measured to the centerline of the dispenser. The outlet of the dispenser shall be 15 inches (380 mm) minimum and 48 inches (1220 mm) maximum above the finish floor and shall not be located behind grab bars. Dispensers shall not be of a type that controls delivery or that does not allow continuous paper flow.</p>		<p>Relocate dispenser below side grab bar as shown when added.</p>
<p>All coat hooks are out of reach range.</p>	<p>604.8.3 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308.</p>		<p>Mount hook at 48" maximum.</p>
<p>Wall mounted dispensers protrude into circulation path.</p>	<p>307 Protruding Objects 307.2 Protrusion Limits. Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path. EXCEPTION: Handrails shall be permitted to protrude 4 1/2 inches (115 mm) maximum.</p>		<p>Replace/reposition dispensers to eliminate protruding objects.</p>
<p>No visible and audible emergency alert systems in place</p>	<p>215 Fire Alarm Systems 215.1 General. Where fire alarm systems provide audible alarm coverage, alarms shall comply with 215.</p>	<p>215.2 Public and Common Use Areas. Alarms in public use areas and common use areas shall comply with 702. 702 Fire Alarm Systems 702.1 General. Fire alarm systems shall have permanently installed audible and visible</p>	<p>Address in planning and procurement when existing fire alarm system is upgraded or replaced, or a new fire alarm system is installed.</p>

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	<p>EXCEPTION: In existing facilities, visible alarms shall not be required except where an existing fire alarm system is upgraded or replaced, or a new fire alarm system is installed.</p>	<p>alarms complying with NFPA 72 (1999 or 2002 edition) (incorporated by reference, see "Referenced Standards" in Chapter 1), except that the maximum allowable sound level of audible notification appliances complying with section 4-3.2.1 of NFPA 72 (1999 edition) shall have a sound level no more than 110 dB at the minimum hearing distance from the audible appliance. In addition, alarms in guest rooms required to provide communication features shall comply with sections 4-3 and 4-4 of NFPA 72 (1999 edition) or sections 7.4 and 7.5 of NFPA 72 (2002 edition).</p>	
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SUPPLEMENTAL PHOTOGRAPHIC GUIDANCE



Blue sign is a directional sign to the accessible entrance
Sign should be mounted adjacent to inaccessible entrance
Compliant parking signs should be provided for this space



The designated accessible entrance should have identifying sign
Attempts have been made to minimize changes in level

SUPPLEMENTAL PHOTOGRAPHIC GUIDANCE



With proper planning and use of grade, ramp may rise < 6 inches

Ramps rising less than 6" do not require handrails

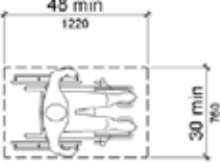
Provide compliant edge protection and level landings top and bottom

Existing interior of unisex toilet room

Placement of lavatory covered by ADA Safe Harbor provisions

Add grab bars and reposition toilet paper dispenser

CITY OF GARDNER ADA SELF-EVALUATION AND TRANSITION PLAN: FACILITY ASSESSMENT REPORT – SEPTEMBER 1, 2016
 STONE CREEK PARK 375 S. STONE STREET

PARKING AND APPROACH			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
No accessible parking is provided.	208.2 Minimum Number. Parking spaces complying with 502 shall be provided in accordance with Table 208.2 except as required by 208.2.1, 208.2.2, and 208.2.3.		Add 1 van accessible on-street parking space with access aisle and signage. Provide connection to accessible route to park.
There is no curb ramp providing access from on-street parking.	406.5 Location. Curb ramps and the flared sides of curb ramps shall be located so that they do not project into vehicular traffic lanes, parking spaces, or parking access aisles.		Provide compliant curb ramp when designating on-street van-accessible parking space.
There is a 1" – 2" change in level between public sidewalk and route through park.	303.2 Changes in level greater than 1/2 inch (13 mm) high shall be ramped, and shall comply with 405 or 406.		Ramp or otherwise mitigate change in level (see recommendation directly below)
Slope of route at entrance to park exceeds 1:20 for approximately 30 feet of run.	403.3 Slope. The running slope of walking surfaces shall not be steeper than 1:20. The cross slope of walking surfaces shall not be steeper than 1:48.		Re-grade and re-surface to provide no greater than 1:20 slope OR Add handrails and other ramp features to one of the sloping paths provided at entrance to park.
No clear ground space at accessible water fountain near shelter.	305.3 Size. The clear floor or ground space shall be 30 inches (760 mm) minimum by 48 inches (1220 mm) minimum.	 <p>The diagram shows a top-down view of a water fountain. A dashed rectangular box indicates the required clear ground space, with dimensions of 48 inches (1220 mm) in width and 30 inches (760 mm) in depth. The fountain itself is centered within this space.</p>	Expand clear ground space positioned for a forward approach.

CITY OF GARDNER ADA SELF-EVALUATION AND TRANSITION PLAN: FACILITY ASSESSMENT REPORT – SEPTEMBER 1, 2016
STONE CREEK PARK 375 S. STONE STREET

PLAY AREAS			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
1-1/2-inch change in level from hard surface route to black rubber padding in play area.	303.2 Changes in level greater than 1/2 inch (13 mm) high shall be ramped, and shall comply with 405 or 406.		Mitigate change in level.
Accessible routes are not provided to play components.	206.2.17.1 Ground Level and Elevated Play Components. At least one accessible route shall be provided within the play area. The accessible route shall connect ground level play components required to comply with 240.2.1 and elevated play components required to comply with 240.2.2, including entry and exit points of the play components.		Provide accessible route to required play components.
Compliant ground surfaces are not provided in play areas	1008.2.6 Ground Surfaces. Ground surfaces on accessible routes, clear floor or ground spaces, and turning spaces shall comply with 1008.2.6.		Replace mulch with permanent surface that comply with ASTM F 1951
Compliant ground surfaces are not provided in play areas.	1008.2.6.1 Accessibility. Ground surfaces shall comply with ASTM F 1951 (incorporated by reference, see "Referenced Standards" in Chapter 1). Ground surfaces shall be inspected and maintained regularly and frequently to ensure continued compliance with ASTM F 1951.		Replace mulch with permanent surface that comply with ASTM F 1951
Compliant ground surfaces are not provided in play areas.	1008.2.6.2 Use Zones. Ground surfaces located within use zones shall comply with ASTM F 1292 (1999 edition or 2004 edition) (incorporated by reference, see "Referenced Standards" in Ch. 1).		In use zones, replace mulch with permanent surface that provides impact attenuation (ASTM 1292) as well as compliance with ASTM F 1951

PLAY AREA SUMMARY

PLAY AREA CONTAINS COMPOSITE PLAY STRUCTURE AND SWINGS

Number of Elevated Play Components: 10

Number of Elevated Play Components Connected by Ramps: 0

Number of Elevated Play Components Connected by Transfer Systems: 2 (5 REQUIRED)

Number of Ground Level Play Components: 10

Types of Ground Level Play Components:

- 2 Spring Rockers
- 1 Communicator
- 1 Tactile Car Dashboard
- 1 Rock Wall
- 2 Swings
- 2 Toddler Swings

Number of Ground Level Play Components on Accessible Route: 0

Types of Ground Level Play Components on Accessible Route: 0

Number of Ground Level Play Components Required to be on Accessible Route: 6 (one of each type)

SUPPLEMENTAL PHOTOGRAPHIC GUIDANCE



Red lines identify area of entrance route exceeding 1:20 slope
Yellow: On street parking should tie in to route into park



Ground level transition location – mitigate 1-1/2-inch change in level

**CITY OF GARDNER ADA SELF-EVALUATION AND TRANSITION PLAN: FACILITY ASSESSMENT REPORT – SEPTEMBER 1, 2016
VETERANS PARK 121 W. PAWNEE LANE**

PARKING AND APPROACH			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
No accessible parking signs are provided.	502.6 Identification. Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1.		Install accessible parking signs.
No “van accessible” sign is in place.	502.6 Signs identifying van parking spaces shall contain the designation "van accessible."		Install “van accessible” parking sign(s).
Curb ramp slope 12%.	406 Curb Ramps 406.1 General. Curb ramps on accessible routes shall comply with 406, 405.2 through 405.5, and 405.10.	In the existing situation, curb ramp slope may be steeper than 1:12 but not steeper than 1:10	Modify curb ramp to ensure slope of no more than 1:10 (10%)
PLAY AREAS			
PLAY AREAS 1 & 2			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
Accessible routes not provided to play components.	206.2.17.1 Ground Level and Elevated Play Components. At least one accessible route shall be provided within the play area. The accessible route shall connect ground level play components required to comply with 240.2.1 and elevated play components required to comply with 240.2.2, including entry and		Provide accessible route to one of each type of ground level play component and access point(s) of composite play structure containing elevated play components.

**CITY OF GARDNER ADA SELF-EVALUATION AND TRANSITION PLAN: FACILITY ASSESSMENT REPORT – SEPTEMBER 1, 2016
VETERANS PARK 121 W. PAWNEE LANE**

	exit points of the play components.		
Ground surfaces in play areas containing composite play structures 1 and 2 are out of compliance.	1008.2.6 Ground Surfaces. Ground surfaces on accessible routes, clear floor or ground spaces, and turning spaces shall comply with 1008.2.6.		Replace mulch with permanent surface that comply with ASTM F 1951
Ground surfaces in play areas containing composite play structures 1 and 2 are out of compliance.	1008.2.6.1 Accessibility. Ground surfaces shall comply with ASTM F 1951 (incorporated by reference, see "Referenced Standards" in Chapter 1). Ground surfaces shall be inspected and maintained regularly and frequently to ensure continued compliance with ASTM F 1951.		Replace mulch with permanent surface that comply with ASTM F 1951
Ground surfaces in play areas containing composite play structures 1 and 2 are out of compliance.	1008.2.6.2 Use Zones. Ground surfaces located within use zones shall comply with ASTM F 1292 (1999 edition or 2004 edition) (incorporated by reference, see "Referenced Standards" in Ch. 1).		In use zones, replace mulch with permanent surface that provides impact attenuation (ASTM 1292) as well as compliance with ASTM F 1951
OTHER AREAS OR ELEMENTS			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
Cross slope 5% in clear ground space for accessible drinking fountain.	305 Clear Floor or Ground Space 305.2 Floor or Ground Surfaces. Floor or ground surfaces of a clear floor or ground space shall comply with 302. Changes in level are not permitted.	EXCEPTION: Slopes not steeper than 1:48 shall be permitted.	Modify clear ground space so no slope in excess of 1:48.

**CITY OF GARDNER ADA SELF-EVALUATION AND TRANSITION PLAN: FACILITY ASSESSMENT REPORT – SEPTEMBER 1, 2016
VETERANS PARK 121 W. PAWNEE LANE**

Large gap opening at in ground surface at accessible drinking fountain.	302.3 Openings. Openings in floor or ground surfaces shall not allow passage of a sphere more than 1/2-inch (13 mm) diameter	Exceptions: allowed in 407.4.3, 409.4.3, 410.4, 810.5.3 and 810.10.	Repair gap and eliminate opening.
Player seating provide no end-of-row wheelchair space.	221.2.1.4 Team or Player Seating. At least one wheelchair space complying with 802.1 shall be provided in team or player seating areas serving areas of sport activity.	802.1 Wheelchair Spaces. 802.1.1 Floor or Ground Surface. The floor or ground surface of wheelchair spaces shall comply with 302. Changes in level shall not exceed 1:48. 802.1.2 Width. A single wheelchair space shall be 36 inches (915 mm) wide minimum Where two adjacent wheelchair spaces are provided, each wheelchair space shall be 33 inches (840 mm) wide minimum.	Provide one wheelchair space complying with 802.

RESTROOM FACILITIES

<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
Lavatory impedes on clearance for water closet.	604.3 Clearance. 604.3.1 Size. Clearance around a water closet shall be 60 inches (1525 mm) minimum measured perpendicular from the side wall and 56 inches (1420 mm) minimum measured perpendicular from the rear wall.	<p>The diagram shows a top-down view of a water closet. A dashed rectangle indicates the required clearances. The vertical dimension on the left is labeled '56 min' and '1420'. The horizontal dimension at the bottom is labeled '60 min' and '1525'. A toilet fixture is shown within the clearances.</p>	Design is covered by SAFE HARBOR provisions of ADA. Design allowed under 1991 ADAAG. When replaced/modified, meet 2010 ADA Standards, which do not allow for lavatory in water closet clear floor space.

PLAY AREAS SUMMARY

PLAY AREA 1

PLAY AREA 1 INCLUDES 1 COMPOSITE PLAY STRUCTURE AND SWINGS

Number of Elevated Play Components: 10

Number of Elevated Play Components Connected by Ramps: 0

Number of Elevated Play Components Connected by Transfer Systems: 5 (Compliant)

Number of Ground Level Play Components: 5

Types of Ground Level Play Components:

- 1 Climber
- 1 Slide
- 1 Pull Up Bar
- 2 Toddler Swings

Number of Ground Level Play Components on Accessible Route: 1

Types of Ground Level Play Components on Accessible Route: 1

Number of Ground Level Play Components Required to be on Accessible Route: 4 (one of each type)

PLAY AREAS SUMMARY

PLAY AREA 2

PLAY AREA 2 CONTAINS 1 COMPOSITE PLAY STRUCTURE

Number of Elevated Play Components: 8

Number of Elevated Play Components Connected by Ramps: 0

Number of Elevated Play Components Connected by Transfer Systems: 2 (4 required)

Number of Ground Level Play Components: 3

Types of Ground Level Play Components:

- Spring Rider
- Tunnel
- Slide

Number of Ground Level Play Components on Accessible Route: 0

Types of Ground Level Play Components on Accessible Route: 0

Number of Ground Level Play Components Required to be on Accessible Route: 3 (one of each type)

SUPPLEMENTAL PHOTOGRAPHIC GUIDANCE



Parking spaces needing accessible signage
Curb ramp slope should be mitigated in future alteration work

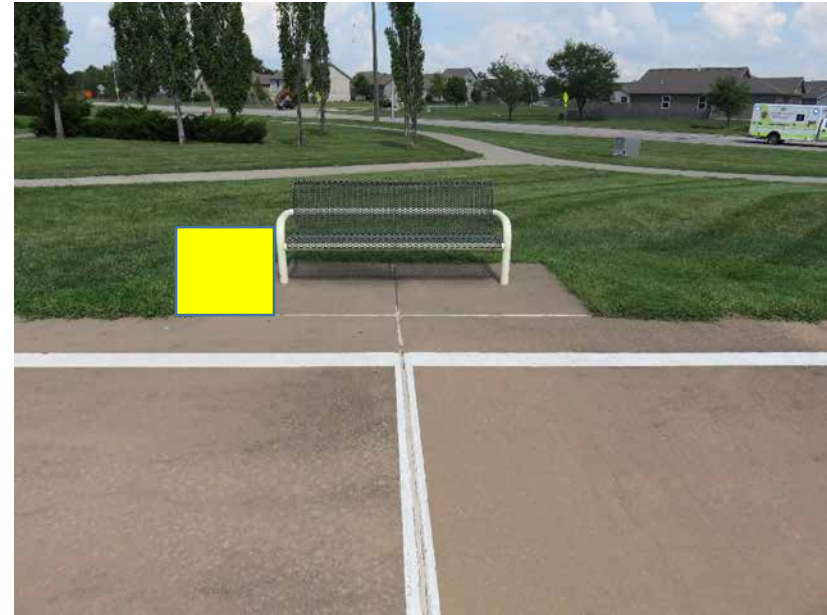


Changes in level/gaps: Settling between concrete areas

SUPPLEMENTAL PHOTOGRAPHIC GUIDANCE



Existing rubber pad surface providing access to base of structure



ADAAG identifies this as an inaccessible player seating area
Space 36" wide X 48" deep with compliant ground surface required
Must be able to enter space from front or rear (if side, 60" min. depth)

CITY OF GARDNER ADA SELF-EVALUATION AND TRANSITION PLAN: FACILITY ASSESSMENT REPORT – SEPTEMBER 1, 2016
WESTSIDE PARK 321 BEDFORD STREET

PARKING AND APPROACH			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
4 parking spaces are designated accessible	208.2 Minimum Number. Parking spaces complying with 502 shall be provided in accordance with Table 208.2 except as required by 208.2.1, 208.2.2, and 208.2.3.	Approximately 165 spaces are provided, requiring 6 accessible parking spaces (1 van accessible). Parking must be dispersed at facilities provided at location.	Add two accessible parking spaces with access aisles and compliant signage mounted 60” minimum above surface of parking space.
No signage is provided for accessible parking.	502.6 Identification. Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1.		Provide signage at each space mounted 60” minimum above parking space ground surface.
No van accessible sign is present.	502.6 Signs identifying van parking spaces shall contain the designation "van accessible."	All spaces and adjacent access aisles are large enough to be van accessible.	Provide “van accessible” signage for at least one parking space mounted 60” minimum above parking space ground surface.
There are no accessible routes to play areas, areas of sport activity, BBQ pits at shelter, or concession/restroom facilities.	Accessible Routes 206.2.2 Within a Site. At least one accessible route shall connect accessible buildings, accessible facilities, accessible elements, and accessible spaces that are on the same site.	403.2 Floor or Ground Surface. 302.1 General. Floor and ground surfaces shall be stable, firm, and slip resistant. Existing surfaces do not withstand effects of inclement weather	Provide accessible route from accessible parking to play areas, areas of sport activity, at least 1 BBQ pit, and other spaces on site.
Change in level of 1” on route to shelter.	303.2 Changes in level greater than 1/2 inch (13 mm) high shall be ramped, and shall comply with 405 or 406.		Bevel or otherwise mitigate change in level.
Running slope of route to shelter up to 12%.	403.3 Slope. The running slope of walking surfaces shall not be steeper than 1:20. The cross slope of walking surfaces shall not be steeper than 1:48.		Provide accessible route Incorporate ramp if slope must be between 1:20 – 1:12

**CITY OF GARDNER ADA SELF-EVALUATION AND TRANSITION PLAN: FACILITY ASSESSMENT REPORT – SEPTEMBER 1, 2016
WESTSIDE PARK 321 BEDFORD STREET**

PLAY AREAS			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
Accessible routes not provided to play components.	Accessible Routes 206.2.17 Play Areas. Play areas shall provide accessible routes in accordance with 206.2.17. Accessible routes serving play areas shall comply with Chapter 4 except as modified by 1008.2.		Provide accessible route to one of each type of ground level play component and access point(s) of composite play structure containing elevated play components.
Compliant ground surfaces are not provided in play areas	1008.2.6 Ground Surfaces. Ground surfaces on accessible routes, clear floor or ground spaces, and turning spaces shall comply with 1008.2.6.		Replace mulch with permanent surface that comply with ASTM F 1951
Compliant ground surfaces are not provided in play areas	1008.2.6.1 Accessibility. Ground surfaces shall comply with ASTM F 1951 (incorporated by reference, see "Referenced Standards" in Chapter 1). Ground surfaces shall be inspected and maintained regularly and frequently to ensure continued compliance with ASTM F 1951.		Replace mulch with permanent surface that comply with ASTM F 1951
Compliant ground surfaces are not provided in play areas	1008.2.6.2 Use Zones. Ground surfaces located within use zones shall comply with ASTM F 1292 (1999 edition or 2004 edition) (incorporated by reference, see "Referenced Standards" in Ch. 1).		In use zones, replace mulch with permanent surface that provides impact attenuation (ASTM 1292) as well as compliance with ASTM F 1951
OTHER AREAS OR ELEMENTS			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
Concession counter 38" high.	904.4 Sales and Service Counters. Sales counters and service counters shall comply with 904.4.1 or 904.4.2. The accessible portion of the counter top shall extend the	904.4.1 Parallel Approach. A portion of the counter surface that is 36 inches (915 mm) long minimum and 36 inches (915 mm) high maximum above the finish floor shall be	Lower counter to 36" maximum above ground.

CITY OF GARDNER ADA SELF-EVALUATION AND TRANSITION PLAN: FACILITY ASSESSMENT REPORT – SEPTEMBER 1, 2016
WESTSIDE PARK 321 BEDFORD STREET

	same depth as the sales or service counter top.	provided. A clear floor or ground space complying with 305 shall be positioned for a parallel approach adjacent to the 36 inch (915 mm) minimum length of counter.	
RESTROOM FACILITIES			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
There are no accessible restroom facilities on an accessible route.	<p>213 Toilet Facilities and Bathing Facilities</p> <p>213.1 General. Where toilet facilities and bathing facilities are provided, they shall comply with 213</p>	<p>An accessible portable toilet room is in place, but is not located on an accessible route.</p> <p>Existing permanent restroom facilities appear too small and too old to renovate effectively.</p>	Provide accessible portable toilet room on an accessible route

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PLAY AREA SUMMARY

PLAY AREA CONTAINS COMPOSITE PLAY STRUCTURE AND SWINGS

Number of Elevated Play Components: 7

Number of Elevated Play Components Connected by Ramps: 0

Number of Elevated Play Components Connected by Transfer Systems: 0

Number of Ground Level Play Components: 7

Types of Ground Level Play Components:

- 1 Slide
- 4 Swings
- 2 Toddler Swings

Number of Ground Level Play Components on Accessible Route: 0

Types of Ground Level Play Components on Accessible Route: 0

Number of Ground Level Play Components Required to be on Accessible Route: 3 (one of each type)

SUPPLEMENTAL PHOTOGRAPHIC GUIDANCE



Existing parking needs signage



Primary accessible route from parking to facility features

SUPPLEMENTAL PHOTOGRAPHIC GUIDANCE



Slope is excessive (12%); regrading and/or ramping needed



Accessible routes to facility areas compromised in inclement weather

SUPPLEMENTAL PHOTOGRAPHIC GUIDANCE



Elements such as dugouts should be on an accessible route



Accessible portable toilet room should be on accessible route

CITY OF GARDNER ADA SELF-EVALUATION AND TRANSITION PLAN: FACILITY ASSESSMENT REPORT – SEPTEMBER 1, 2016
WINWOOD PARK 520 N. WHITE DRIVE

PARKING AND APPROACH			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
No accessible parking is provided.	208.2 Minimum Number. Parking spaces complying with 502 shall be provided in accordance with Table 208.2 except as required by 208.2.1, 208.2.2, and 208.2.3.		Add 1 van accessible on-street parking space with access aisle and signage. Provide connection to accessible route to park.
There is no curb ramp providing access from on-street parking.	406.5 Location. Curb ramps and the flared sides of curb ramps shall be located so that they do not project into vehicular traffic lanes, parking spaces, or parking access aisles.		Provide compliant curb ramp when designating on-street van-accessible parking space.
PLAY AREAS			
<i>EXISTING CONDITION</i>	<i>2010 ADA STANDARD CITATION</i>	<i>ADDITIONAL GUIDANCE</i>	<i>RECOMMENDATIONS</i>
PLAY AREAS 1 & 2			
Accessible routes are not provided to play components.	206.2.17.1 Ground Level and Elevated Play Components. At least one accessible route shall be provided within the play area. The accessible route shall connect ground level play components required to comply with 240.2.1 and elevated play components required to comply with 240.2.2, including entry and exit points of the play components.		Provide accessible route to required play components.

**CITY OF GARDNER ADA SELF-EVALUATION AND TRANSITION PLAN: FACILITY ASSESSMENT REPORT – SEPTEMBER 1, 2016
WINWOOD PARK 520 N. WHITE DRIVE**

Compliant ground surfaces are not provided in play areas.	1008.2.6 Ground Surfaces. Ground surfaces on accessible routes, clear floor or ground spaces, and turning spaces shall comply with 1008.2.6.		Replace mulch with permanent surface that comply with ASTM F 1951
Compliant ground surfaces are not provided in play areas.	1008.2.6.1 Accessibility. Ground surfaces shall comply with ASTM F 1951 (incorporated by reference, see "Referenced Standards" in Chapter 1). Ground surfaces shall be inspected and maintained regularly and frequently to ensure continued compliance with ASTM F 1951.		Replace mulch with permanent surface that comply with ASTM F 1951
Compliant ground surfaces are not provided in play areas.	1008.2.6.2 Use Zones. Ground surfaces located within use zones shall comply with ASTM F 1292 (1999 edition or 2004 edition) (incorporated by reference, see "Referenced Standards" in Ch. 1).		In use zones, replace mulch with permanent surface that provides impact attenuation (ASTM 1292) as well as compliance with ASTM F 1951
Clear ground space not provided at transfer platform serving composite play structure.	1008.3.1.3 Transfer Space. A transfer space complying with 305.2 and 305.3 shall be provided adjacent to the transfer platform. The 48 inch (1220 mm) long minimum dimension of the transfer space shall be centered on and parallel to the 24 inch (610 mm) long minimum side of the transfer platform. The side of the transfer platform serving the transfer space shall be unobstructed.		Expand clear ground space to meet requirements of 1008.3.1.3.

PLAY AREAS SUMMARY

PLAY AREA 1

PLAY AREA 1 CONTAINS 1 COMPOSITE PLAY STRUCTURE AND SWINGS

Number of Elevated Play Components: 11

Number of Elevated Play Components Connected by Ramps: 0

Number of Elevated Play Components Connected by Transfer Systems: 7

Number of Ground Level Play Components: 6

Types of Ground Level Play Components:

- 1 Spring Rocker
- 2 Communicators
- 2 Swings
- 1 Pull Up Bar

Number of Ground Level Play Components on Accessible Route: 0

Types of Ground Level Play Components on Accessible Route: 0

Number of Ground Level Play Components Required to be on Accessible Route: 4 (one of each type)

PLAY AREAS SUMMARY

PLAY AREA 2

PLAY AREA TWO CONTAINS 1 COMPOSITE PLAY STRUCTURE AND TODDLER SWINGS

Number of Elevated Play Components: 7

Number of Elevated Play Components Connected by Ramps: 0

Number of Elevated Play Components Connected by Transfer Systems: 1 (4 required)

Number of Ground Level Play Components: 6

Types of Ground Level Play Components:

- 2 Spring Rockers
- 1 Control Panel
- 2 Toddler Swings
- 1 Slide

Number of Ground Level Play Components on Accessible Route: 0

Types of Ground Level Play Components on Accessible Route: 0

Number of Ground Level Play Components Required to be on Accessible Route: 4 (one of each type)

SUPPLEMENTAL PHOTOGRAPHIC GUIDANCE



Rubber mats providing route to base of composite play structure



Recommend bolstering communication of danger on this route
Enhance with larger signage providing better color contrast