



HURON-CLINTON METROPARKS ADA TRANSITION PLAN

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INTRODUCTION

TRANSITION PLAN NEED & PURPOSE

The Metroparks are committed to regularly revisiting and assessing operations and facilities to ensure compliance with the Americans with Disabilities Act of 1990.

The Americans with Disabilities Act (ADA) is a civil rights law prohibiting discrimination against individuals based on disability.

The required contents of an ADA transition plan are:

1. Identification of physical obstacles that limit accessibility to programs, services, and activities;
2. The method to be used to make the facilities accessible;
3. A schedule for making modifications; and
4. The name of the public official responsible for the implementation of the transition plan.



Although original accessibility guidelines applicable to local municipalities were published in 1990, several additions related to recreation facilities were added between 2000-2004. Given these additions, parallels between these guidelines and the Architectural Barriers Act Accessibility Guidelines, which are applied to a building if any federal monies or uses are involved, a combined version of the ADA-ABA was introduced in 2004. During this timeframe, outdoor standards were also created to apply ADA standards to outdoor natural environments in addition to structures that were built. These standards are known as the Federal Outdoor Area Technical Guidelines. Although these standards are currently only enforceable for federal facilities, they provide the Metroparks with best practice guidelines to meet inclusive policy and philosophy goals.

The combined ADA-ABA guidelines resulted in the 2010 Accessibility Standards, which were adopted as one comprehensive universal standard for federal and local jurisdictions in July 2010 and posted to the Federal Register in September 2010. The 2010 Accessibility Standards hereafter referenced as “2010 Standards” became enforceable in March 2012.



INTRODUCTION

TRANSITION PLAN DEVELOPMENT

In 2018, the Metroparks Planning and Development Department revisited the Authority's 1994 ADA Transition Plan and conducted a thorough assessment of all physical barriers within the 13 Metroparks.

The 2010 Standards address common elements of the “built environment,” such as buildings, parking lots and access routes, as well as recreational facilities such as amusement rides, play equipment, boat docks and launches, fishing piers, swimming pools, golf and mini-golf courses and shooting facilities.

While they have not yet been adopted for state and local governments, guidelines for developed outdoor areas have been introduced. In 2013, these guidelines became enforceable standards for all federally-owned areas. Experts expect these same guidelines will eventually be adopted for state and local governments as well.

Within the 2010 standards, the U.S. Department of Justice (DOJ) recommended the following priorities, in order for barrier removal:

1. Approach and Entrance – parking lots, transit stops, exterior access routes, building entrances, etc.
2. Access to Goods and Services – service counters, seating areas, etc.
3. Toilet Facilities – including bathing facilities
4. Additional Access – telephone, drinking fountains, and alarm systems

This priority system was developed for private owners of places for public accommodation (such as retailers, restaurants and spectator facilities) and applies primarily to building sites with one main entry point.

As written, the priority system developed by the DOJ does not work well for open areas with different types of recreation opportunities throughout the park. However, using the rationale behind their development, they can be modified to create a priority ranking for park and recreation facilities in the table below.

In this modified system, the first priority identified by the DOJ, “Approach and Entrance,” was defined as the park entrances, restroom entrances, the larger day-use parking lots within the parks and the access routes from those parking lots to

the primary facilities they serve. The second through fourth priorities address recreational opportunities at the parks. The fifth priority is defined as non-essential support, facility services. The sixth priority has been assigned to physical barriers in structures that have been identified in master plans needing further study. Finally, the seventh priority refers to physical barriers that would impede a park employee but not the general public.

PRIORITY RANKING	
1	Primary recreational visitor approach and entrance areas Areas with primary approach and entrances for visitors to parks that include parking lots, building entrance, facility approach, picnic shelters
2	Access to goods and services recreational visitor areas Service counters, seating areas, golf patios, outdoor food bars
3	Restrooms that support primary recreational visitor areas Restrooms
4	Secondary recreational visitor approach and entrance areas Mountain biking, equestrian trails, disc golf, picnic areas (non-shelter), water refill stations
5	Non-essential park user recreational support, facility services Park office, administrative office, rental center, concessions, police
6	Facilities needing further study for future use, renovation, replacement, or removal Facilities identified in 10-year master plans needing further study for future use, renovation, replacement, or removal
7	Physical structural barriers in facilities that impede park employees but not the general public Maintenance areas, dam facilities

The integration of the transition plan with master planning and capital improvement planning is key to completing the tasks identified in the transition plan. In fiscal year 2019, the Metroparks included a general funding line item for each park for accessibility improvements in the general budget.

Moving forward, top priority projects will be added into annual capital and major maintenance improvement projects and identified in the Five-Year Community Recreation Plan and 10-year master plan (five-year amended) developments. The appendices detail specific actions to be taken at each Metropark. They are listed by priority ranking as outlined above.

The Metroparks are currently developing a Recreation Programming Plan, which will incorporate the accessibility initiative. Planning and Development staff will work with other Metroparks departments to develop a separate signage transition plan in 2020.

FACILITIES

The most recent park maps were used to identify all facilities within each planning area. Field surveying was completed by Planning and Development staff for facilities based on the 2010 standards checklist from the New England ADA Center (see Appendix 1. ADA Checklist). Survey data was entered into a spreadsheet for each facility. Once assessments were completed, each facility was prioritized based on the seven DOJ rankings (customized for the Metroparks) and further analyzed into sub-DOJ category rankings based on other factors including the highest number of deficiencies, high activity facilities, and equity-based on associated fees with certain facilities (see Appendix 2. Facilities Transition Plan). Field surveys were limited due to staff and time allocation during the first year in completing assessments for all existing facilities including trail-heads, hike-bike trails, bike racks, outdoor patios, water-refill stations, drinking fountains, disc golf, and maintenance areas. These remaining field surveys are on-going with completion date anticipated sometime in 2020 and updated in the facilities transition plan accordingly.

DOJ priority ranking

Sub-DOJ category ranking

PRIORITY 1. PRIMARY RECREATIONAL VISITOR APPROACH AND ENTRANCE AREAS

Park	Location	Description	Justification/Solution	Cost	Timeline	Priority Ranking
Willow	Washago Pond South Lot	Improved access desired to soccer fields from the parking lot access drive. Culvert needed.	Access is needed along the access drive to the south lot. Wood decking is currently in place to bridge the drainage swale. Provide a surface that is firm and stable with a running slope no steeper than 5% and a cross slope not steeper than 2%, a minimum clear width of 36".	To be determined	Complete	1
Dexter-Huron	Northwest Parking Lot	Access walk desired from the west parking lot to the hike-bike trail. Could be part of the 52B trail project.	Heavily used trailhead. Worn path used as this time does not provide good access for strollers, rollerblades, etc. Provide a surface that is firm and stable with a running slope no steeper than 5% and a cross slope not steeper than 2%, a minimum clear width of 36".	To be determined	2021	1
Huron Meadow	Acorn Ridge	Accessible walks desired connecting the parking lot, picnic shelter, restrooms, and accessible playground. 470' of path needed. Accessible parking spaces	Popular area for a variety of activities. No access paths at this time. Provide a surface that is firm and stable with a running slope no steeper than 5% and a cross slope not steeper than 2%, a minimum clear width of 36".	To be determined	2021	1

PICNIC FACILITIES

Picnic facilities were defined as part of the ADA transition plan. A picnic facility is a site or a portion of a site, that is developed for outdoor recreational purposes and contains picnic units. A picnic unit is an outdoor space in a picnic facility that is used for picnicking and contains at least one outdoor constructed feature such as a picnic table. The priority rankings with recommendations for picnic units include maps depicting picnic facilities within the parks and the dispersing of picnic units (see Appendix 3. Picnic Facility Maps). A prioritization of picnic units by each park can be found in the GIS dataset (see Appendix 4. Picnic Units Prioritized by Park). Below are two general recommendations for picnic facilities and units. Specific recommendations can vary by facility and unit. For example, combining adjacent picnic facilities and picnic units, removing tables from a unit, and adding grills to a unit to help maximize dollars spent on providing accessible features.

Picnic units with shelters were ranked higher than picnic units without shelters based on the methodology used in the prioritization. In order to rank picnic shelter units within a park, shelter rental revenue averages over the past three years were collected and ranked highest to lowest three-year rental rate average from park operations staff. The remaining proposed accessible picnic units were ranked after shelters based on numerous factors. Some of these factors include proximity to existing walkways, trails, parking lots, restrooms, fishing piers, pools, and other desired park features. Also, the feasibility and limited constraints for removal of barriers factored into the ranking.

PICNIC FACILITY RECOMMENDATION

When only one or two picnic units are provided in a picnic facility, each picnic unit must provide mobility features. When more than two picnic units are provided in a picnic facility, at least 20 percent, but no less than two, of the picnic units must provide mobility features (2010 standards). Metroparks picnic facilities should meet the standards and go beyond by ensuring all picnic units with shelters are made accessible and a minimum of two picnic units outside shelters dispersed within the facility be made accessible.

PICNIC UNIT RECOMMENDATION

Picnic units typically contain tables and grills (constructed features). The ADA Transition Plan is a snapshot in time with picnic unit elements subject to change based on events and activities. When updating, an accessible route and surface around accessible grills and picnic tables and other elements is required. A conceptual site plan should be developed by Planning and Development staff and reviewed by Park Operations prior to redeveloping picnic units.

PLAYGROUNDS

Certified Playground Safety Inspectors performed assessments on playground barriers. Assessments of playgrounds include a thorough safety inspection per established standards, an examination of the slopes and clear space in and around the play area, and an inventory of play components. Staff also performed ADA assessments with the checklist provided for play structures based on the 2010 Standards.

The Metroparks 2018-2022 Community Recreation Plan includes an inventory of all playgrounds in each park. ADA assessments were conducted for all play areas where a quantity and variety of play elements typically are located. The goal is to ensure full accessibility at all playground and to ensure that like play experiences are provided for all abilities. In some cases it may be feasible to either add an accessible walkway to small play areas or relocate them in accessible clusters.

Playground areas with physical barriers are addressed in this transition plan but are not ranked based on the priority system used for facilities (see Appendix 5. Playground Transition Plan). The checklist from the New England ADA Center was adapted and used in the field evaluations of large playgrounds in the parks. The checklist results were used to develop a rating for each facility, shown in a table for each park. The rating system is as follows:

1. no elements are accessible
2. some elements are accessible
3. most elements are accessible
4. all elements are accessible
5. facility follows Universal Design principles



PROGRAMMING

The Metroparks are also embarking upon an amendment to the 2018-2022 Community Recreation Plan that will include a Recreation Programming Plan.

This transition plan is a living document and will integrate the programming action items once identified in the Recreation Programming Plan action plan. This plan will be drafted and reviewed by respective staff engaged in a self-evaluation of all Metroparks programming and services offered by Interpretive Services, Natural Resources, Golf, Police and Marketing. Each department will categorize its programming into groups of similar types of activities (e.g. programs, events, activities) and then analyze each activity in terms of vision, hearing, and mobility barriers that may exist (see Appendix 6. Programming Transition Plan). The resulting actions will be in a spreadsheet format that identifies any necessary modifications and establishes timelines as to when the modifications would be completed.

As one of its first action items, the Metroparks will create an accessibility webpage, which will be organized to include all of the information related to accessibility in one location. Information related to the Metroparks accessibility practices will include both the availability of regular programming available to individuals with disabilities, and the custom and adaptive programming that could be made available including, but not limited to, birding, fishing, hand-cycling, nature appreciation hikes, photography, snowshoeing, adaptive paddling, kayaking, canoeing, stand-up paddle boarding, camping and mobility services for golfing. Cognitive barriers are addressed mostly on a case-by-case basis, as experience has proven that solutions for individuals with cognitive disabilities are fact-driven and very case-specific.



SIGNAGE

The Marketing and Planning and Development departments are engaged in a comprehensive review of Section 216 and 703 of the ADA Standards to incorporate in an ADA Signage Compliance Manual.

This manual will be used as a tool to ensure that all existing and future signage that is created or ordered for use at the Huron-Clinton Metroparks will comply with all applicable ADA standards. The completion date is anticipated sometime in 2020.



ADA COORDINATOR & GRIEVANCE PROCEDURES

The Chief of Diversity, Equity, and Inclusion serves as the ADA Coordinator for the Huron-Clinton Metroparks. In the ADA Coordinator capacity, she also oversees the Grievance Procedure which contains the following provisions. Complaints are to be filed, in writing if possible, containing sufficient facts to investigate. The complaint must be submitted no later than sixty (60) calendar days after the alleged violation to:

Artina Sadler

Chief of Diversity, Equity and Inclusion (DEI)

(810) 819-7540

artina.sadler@metroparks.com

13000 High Ridge Drive

Brighton, Michigan 48114



PUBLIC PARTICIPATION

The public participation process is critical prior to adoption of the Transition Plan and is a federal requirement that stakeholders be included in the process of developing the Transition Plan.

Recent planning efforts gathered public input and stakeholder feedback on prioritizing facilities, programs and amenities and identifying accessibility opportunities and issues.

The 2018-2022 Metroparks Community Recreation Plan was approved by the Huron-Clinton Metropolitan Authority (HCMA) Board of Commissioners by resolution on September 14, 2017. The Metroparks worked with a consultant to conduct a formal survey targeting a representative sample of the southeast Michigan community geared toward both individuals who currently use the parks and those who do not use the parks but may have unmet recreational needs.

The creation of the Recreation Programming Plan has also taken into account public input during the planning process. A total of 2,876 participants from an online survey provided public input on the types of programs that are most important to visitors. The Transition Plan sought further input from the online survey, an email blast with a brief questionnaire to stakeholder groups and posting of the draft plan for two weeks on the Metroparks website for public comments.

The results of the public input process were taken into account when determining which types of facilities to prioritize and in prioritizing the elements within the facilities. The overall summary of the public input process, online survey and questionnaire, and social media/website posting is provided (see Appendix 7. Public Input Summary).



CONCLUSION

The Metroparks are committed to providing safe and accessible facilities and services to all citizens. Consistent with the Americans with Disabilities Act (ADA) regulations, the Metroparks will ensure that there is no discrimination against individuals on the basis of disability in its programs and services.

The Metroparks will implement the Transition Plan as outlined and will continue to look for ways to remove barriers to access so that individuals with disabilities have equitable access to Metroparks programs, services, and activities. The Metroparks will follow-up on corrective actions recommended by the Transition Plan, by continually updating the Transition Plan documenting its efforts in compliance with the ADA.

While the Metroparks will undertake capital improvements to address the items in the Transition Plan, the agency will also address ADA standards throughout its programs and services in the following ways:

1. Through design and construction guidelines and standards that ensure that all new construction is ADA compliant and that all capital improvements consider the needs of all users;
2. Every five years updating its ADA Transition Plan to reflect capital programming and planning and to ensure the Metroparks are making significant progress in addressing accessibility needs;
3. By ensuring ADA compliance when Metroparks facilities are maintained and upgraded;
4. Through ongoing education and training of Metroparks staff

The following additional facilities and park features were not included in this ADA Transition Plan. These items will be addressed per ADA standards and incorporated into the plan over the next year.

- Fishing line disposal units
- Small libraries
- Dog waste stations
- Corn hole
- Game tables
- Viewing scopes
- Grills
- Port-a-john locations

- Benches
- Trash/recycle bins
- Foot wash stations
- Bike racks
- Bike repair stations
- Water refill stations/drinking fountains
- Hike-bike trail
- Trailheads
- Disc golf courses
- Campgrounds
- Outdoor patios
- Maintenance yards