TO: Urbana Park District Board of Commissioners

FR: Timothy A. Bartlett, Superintendent of Planning and Operations, Corky Emberson, Superintendent of Recreation, Andy Rousseau, Recreation Special Project Assistant, and Katie Linnemann, Planning Special Project Assistant

CC: Vicki Mayes, Executive Director of Parks and Recreation

DT: December 6, 2011

RE: UPD ADA Transition Plan

BACKGROUND

In 1991/1992, the District completed an ADA audit that checked all parks and facilities for each location's compliance with the American with Disabilities Act. At that time, the District was faced with the task of updating many features and facilities to reach compliance under those regulations. However, those standards are now dated and it was time to undergo the process again.

Therefore, as part of a joint effort with Champaign Park District and Champaign-Urbana Special Recreation, UPD hired Recreation Accessibility Consultants (RAC) to complete a district-wide accessibility audit. The group went to each park and facility in the District and checked for each location's compliance with regulations under **Title II and Title III of the 2010 American with Disabilities Act** and the **Architectural Barriers Act**. In total, they found 1,354 access deficits in the 28 parks and facilities they visited. While that number may seem large, RAC explains that for every deficit they found, nearly ten other features were in compliance (meaning that 13,540 features were in compliance). It is also important to note that this is not a unique situation to this District. Most parks and facilities at any park district face the same compliance issues.

The purpose of this audit is to bring attention to the barriers so that the District can continue to offer the highest level of service to the community, not to point out the access deficiencies in an effort to find fault with the District. It is the goal of the District not to discriminate against or exclude any person from a park, facility, or program based on a disability. As a result staff members Andy Rousseau, Katie Linnemann, and Intern Cris Sibri took the information provided by RAC and compiled it into a transition plan so that the District can begin the process of achieving and maintaining the highest level of accessibility possible.

The attached Introduction pages from the transition plan explain how the transition plan works and how the priorities for improvement were set. It also includes general recommendations from the consultants on ways to improve or maintain the level of accessibility throughout the District. Improvements will be addressed in the following ways:

1. Some will be rolled into planned capital projects
2. Some will be added as new capital projects
3. Some will be addressed using ADA funds

The transition plan will be used to track the progress of the improvements and will be reviewed annually to ensure progress and to reevaluate the priorities. Additionally, ADA compliance will become a permanent agenda item at the monthly Capital Project Planning meeting and an update from each facility will be discussed at that time. Each facility's newly designated ADA contact will be responsible for relaying information to Katie Linnemann to provide the updates at this meeting. At the same time, she will update the Master Transition Plan located at Phillips Recreation Center. This version of the plan will be made available for public record, as well as serve as the version that will keep the District in compliance under the Department of Justice's regulations.

Urbana Park District

URBANA PARK DISTRICT
ADA TRANSITION PLAN

STAFF PRELIMINARY DRAFT
DECEMBER 2011

Accessibility Audit Completed by:
Recreation Accessibility Consultants
Transition Plan Completed by UPD staff

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Under Title II and Title III of the Americans with Disabilities Act (42 USC 12131) and the Architectural Barriers Act, regulations prohibit public entities, such as the Urbana Park District, from discriminating against or excluding a person from programs, services, or activities on the basis of disability. The definition of programs and services is broad and includes public parks and recreation operations, such as the many unique opportunities made available for the enjoyment of the Urbana Park District participants.

As a result, Recreation Accessibility Consultants was hired in coordination with the Champaign Park District to conduct a comprehensive evaluation of the facilities, parks, and playgrounds in the district. This group reviewed each park district facility and park for their compliance with the 2010 ADA Accessibility Guidelines, Illinois Accessibility Codes, and the proposed Playground, Outdoor Developed and Recreation Standards. Each deficit was outlined by the group and they offered recommendations to remedy each compliance issue. Staff members Andy Rousseau, Katie Linnemann, and Cris Sibri took this information and compiled it into this transition plan. This information is outlined in the following report, with a summary of the general recommendations provided by Recreation Accessibility Consultants found at the end of this section.

In conjunction with this report, a review of the park district's policy and procedures will be conducted. These policies and procedures will be updated to reflect changes made specifically to ensure the accessibility of park district programs and sites. The policy and procedure manual will be a working document and will undergo a continuous review process to ensure accessibility in the future. Additionally, Title II of the ADA requires that one staff member be designated as ADA Coordinator. This person is responsible to receive, review, and respond to questions and concerns expressed by a person with a disability related to access of the parks and programs. In addition, this person is responsible for the implementation of the removal of access barriers recognized in the transition plan. Dawn Schaefer, Director of Champaign-Urbana Special Recreation, has been designated as the ADA Coordinator for Urbana Park District. Her contact information is as follows:

Dawn Schaefer
Director, Champaign-Urbana Special Recreation
1311 W. Church St.
Champaign, IL 61821
PHONE: (217) 239-1152
TTY: (217) 239-1157
FAX: (217) 373-7951
cusr@cparkdistrict.com

Compliance with Title II and Title III of the Americans with Disability Act, as well as the Architectural Barriers Act, is a civil rights issue. As such, it is regulated by the Department of Justice. Section 35.150 of the US Department of Justice regulation implementing the ADA makes it clear that not necessarily every facility or site of the same type must be made accessible. This concept reflects some of the recommendations in this report. However, it is critical to measure each feature of each element of each site, so that as the various areas are updated and changes are made, the access issues that exist can be corrected at that time.

The information in this transition report serves as a guide to outline the deficient areas in the park district. By listing each deficiency, it is possible to assign a priority for improvement, as well as track the completion status of the improvements. The transition plan will also serve as a guide in the planning process for the Capital Improvement Plan which is updated every five (5) years.

Staff has taken time to prioritize the improvements based on a series of criteria. These criteria include the ease of making the improvement, the cost of the improvement, and the degree of the barrier to access, as well as taking into consideration the recommendations of Recreation Accessibility Consultants found in the next section. Each improvement has been assigned a priority from 1 to 4. Any improvement that has been assigned a “1” would be considered a first priority due to the ease of fixing the problem. These deficiencies can largely be addressed by maintenance staff at a relatively low cost to the park district. Improvements that have been assigned a “2” include improvements that are a high priority due to the degree of the barrier to access, but will require significantly more resources to complete. These types of improvements will likely be a moderate cost to the park district and funding will need to be budgeted accordingly. Improvements that have been assigned a “3” are projects that will be very costly to the park district to address. These types of projects include things such as re-grading and repaving parking lots and other larger structural changes. Additionally, they include updates to “employee only” spaces that are not considered accessible. Obviously, in the event that a person with a disability is unable to perform their job duties due to these deficiencies, these spaces would become higher priority. Finally, any improvement that has been assigned a “4” is an improvement that is just not feasible to fix. These often include structures that would have to be torn completely down and rebuilt to meet the accessibility requirements. As the structures age and are replaced, all ADA requirements will be met at that time. It is important to note that these priorities are flexible and some lower priority projects can be completed before higher priority projects if there is public need for improvement or if improvements can be incorporated into other planned projects.

An integral part of the self-evaluation of sites and facilities is the involvement of the public. A public forum will be scheduled for December 2011. The complete report as provided by Recreation Accessibility Consultants, as well as this transition plan, will be available at Phillips Recreation Center, 505 W. Stoughton. Any resident is welcome to visit the facility and review the documentation.

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GENERAL RECOMMENDATIONS PROVIDED

BY RECREATION ACCESSIBLITY CONSULTANTS

Maintenance

The District uses a conscientious staff to maintain its facilities and sites. However, over time, every facility and site yields to wear and tear. The following recommendations describe ways in which attention to maintenance can specifically address some access deficits.

1. ***Provide training*** to maintenance staff regarding the features of an accessible route and how to ensure that it remains unobstructed and that park amenities (such as garbage cans or signs) are placed adjacent to the accessible route.
2. ***Provide training*** to recreation staff regarding the features of an accessible route and how to ensure that it remains unobstructed.
3. ***Purchase new tools***. The district should have enough battery-powered levels and tools to measure pounds of force for doors to equip some staff for occasional spot-checks.

Changes in Level and Gaps

The routes and sidewalks that make up the District's network of accessible routes are in fair condition. Wear and tear, settling, weather, and other factors combine to cause changes in level and gaps along portions of those accessible routes, making that portion noncompliant and a barrier to many customers with physical and sensory disabilities.

Removing changes in level and gaps has a significant universal design benefit too, as more people with all types of conditions can more easily use District routes…staff pushing carts of supplies, parents with kids in strollers, and people using an assistive device such as a wheelchair, Segway, or walker.

1. ***Eliminate changes in level*** in 2012 or 2013. Using the rationale that the most severe changes in level are the greatest barriers to access, make changes in level of greater than .75" the highest priority. Make changes in level of between .5" and .75" the second priority. Make beveling of changes in level of .25" to .5" the third priority.
2. ***Add*** change in level of more than .25", and gap checks of greater than .5", ***to park maintenance safety checklists*** in 2011 if not sooner. This will help identify and correct these problems before they expand. Make pre-measured shims and distribute to employees for their use and ease of measurement.
3. ***Add inspections for gaps*** of greater than .5" ***to park maintenance safety checklists***. Identify and fill these gaps before they expand. ***In the alternative, consider a resurfacing of segments of asphalt route*** which have deteriorated.
4. ***Adopt*** a policy about the use of other Electronic Personal Assistive Mobility Devices (EPAMDs) in District facilities and at District sites, and promote that policy to the general public. Every day, more people with limited physical mobility start to use a Segway or similar machines.

Obstructed Accessible Routes

Employees ***may*** see an accessible route as an empty 36" wide space in which a potted plant or garbage can is a perfect fit. However, that blocks or obstructs the accessible route.

1. ***Provide training to park maintenance, recreation, and administration staffs*** regarding maintenance of accessible routes in parks and in recreation facilities.

Employee Work Areas

The District employs many well-qualified and skilled people on a full time basis, making parks and recreation services available to Urbana Park District residents. It also employs many more on a part-time or seasonal basis.

The District already has employees with disabilities and in the future, will have ***more*** employees with disabilities, in all categories…full time, seasonal, and regular part time.

It is important to address access to work areas, and both the Title II regulation and the work of the Access Board do so. In section 203.9 of the 2004 consolidated accessibility guidelines, the treatment of employee areas is made clear.

Generally, a person with a disability should be able to ***approach***, ***enter***, and ***exit*** the work area. This is addressed by requirements for accessible routes and accessible means of egress. Other factors are door width and threshold changes in level.

Excluded from this exception are several types of common spaces in employee areas. Spaces such as the ones below must meet the access guidelines as they are excluded from the definition of employee-only areas:

- corridors
- toilet rooms
- kitchenettes for employee dining use
- **break rooms**

In short, the key issues are the accessible route, changes in level, doors and entries, and maneuvering space once within the work area. This approach is effective so long as when the District hires an employee with disabilities, or a current employee acquires a disability, it will remove architectural barriers in work areas or make other accommodations.

1. ***Address accessibility in the District personnel policies***, and note that, upon request by an employee, the District will make reasonable accommodations, which ***may*** include the removal of architectural barriers in work spaces.
2. ***Require new construction, and alterations or additions*** that include employee work areas to be designed and constructed so they are compliant with the 2010 Standards of Accessible Design and the Illinois Accessibility Code.

Accessible Parking

The District maintains approximately 623 standard parking spaces at facilities, and 38 more that are designated as accessible stalls. Illinois requirements here are more stringent than federal requirements. In correcting or refreshing its accessible stalls, the District should address all of them at once to eliminate inconsistencies and come into compliance.

1. ***Create a parking stall template.***
   a. Stalls must be a minimum of 8' wide. An adjacent access aisle must also be a minimum of 8' wide. An acceptable ***alternative*** design is an 11' stall with an adjacent 5' access aisle.
   b. The access aisle must be diagonally striped with high quality yellow paint.
   c. Signs must be mounted on posts not farther than 5' from the head of the stall.
   d. The collection of signs must include the US Department of Transportation R7-8 standard sign (the blue icon in a wheelchair). Below that must be the fine sign.
   e. The statewide fine is $250. Unless the City of Urbana has adopted a higher fine by ordinance, the sign must note the $250 fine.
   f. Federal settlement agreements in Illinois require a third sign, on at least one stall, that says VAN ACCESSIBLE. The Illinois Accessibility Code does not include this requirement but we believe it is required. This belief was reinforced recently by a US Department of Justice settlement with St. Clair County in Illinois, where the settlement required the addition of "van accessible" signs.
   g. Finally, the bottom edge of the lowest sign is a minimum of 48" above the finished grade. We recommend 60" so it cannot be obstructed by a parked auto.
   h. We suggest that the signpost be located at the head of the accessible stall and that the curb cut and detectable warning run the distance of the access aisle.
   i. ***Perhaps the most common error we see in accessible parking stalls and access aisles is the slope. The Illinois Accessibility Code limits the slope to not more than 2% in any direction. This is a challenging requirement that can take considerable effort to meet.***
   j. The access aisles should connect to an accessible route. The maximum running slope for the accessible route is 5%, and to account for heaving and settling, we recommend 4%.

a. The maximum cross slope is 2%. Do be certain to use compliant detectable warnings, which now come in a template with a colored background and raised, truncated domes.
b. The loading zone must have an access aisle adjacent and parallel to the vehicle pull-up space. The loading zone access aisle must be a minimum of 5' wide and 20' long.

2. In 2012, 2013, or 2014 ***implement a plan to correct or refresh every accessible stall*** at every District facility. Incorporate this task into other plans that require parking lot restriping or resurfacing. Certainly in 2011 as lots are resurfaced or restriped, use this template as well.

Running and Cross Slope

We often saw running slopes steeper than permitted. At some sites this was a minimal issue, but at other sites it was a significant variance. This condition naturally occurs when concrete settles, or when connections between new and old routes are off by fractions of an inch. Cross slope is equally important, as it serves drainage as well as access purposes.

1. ***Adopt a policy*** that in new construction and alterations the ramp slope shall not exceed 1:13, or 7.7%, as opposed to 1:12, or 8.33%. This allows room for error in the field. It also makes ramps easier to use for everyone, not just people with disabilities. This universal design approach is also a risk management tool.
2. ***Adopt a policy*** that in new construction or alterations the cross slope shall be an integral part of the project and shall not exceed 2% or 1:50.

Detectable Warnings

The US Access Board suspended the detectable warning requirement in the late 90's, for a period of several years. It was restored in 2002 though, and is now included in the 2010 Standards. It is typical to see noncompliant detectable warnings in every community.

The detectable warnings at curbs ***that are not compliant*** are often a cross-cut of concrete, or a grid laid on wet concrete to create a diamond-shaped indentation. Over time these should be replaced.

1. As with parking, ***develop a template for detectable warnings***. Confirm the template with the City of Urbana and the Illinois Attorney General's Office.
2. In the same year that parking is refreshed, ***implement a plan to correct or refresh every detectable warning*** at every curb or crossing at District facilities. If necessary, phase this out over a two or three year period.

Door Opening Force Requirements

In District buildings and facilities, there are approximately 193 doors. Many have closer mechanisms. Some of these need adjustment to bring the pounds of force (lbf) necessary into compliance (5 lbf for interior doors and 8.5 lbf for exterior doors).

However some of the closers are just old. The wear and tear of 20 or more years erodes the closer effectiveness.

1. ***Evaluate and determine the age of door closers.***
2. ***Add door closer maintenance checks*** to safety checklists for employees and for closers with 10 years of service or less, aggressively maintain them for effectiveness.
3. ***Purchase and install*** new door closers for all exterior doors (with closers 20 years old or more) and 50% of interior doors in 2012 or as soon as possible.
4. ***Purchase and install*** new door closers for all remaining interior doors (with closers 20 years old or more) in 2013 or as soon as possible.

Signage

District signs can serve several valuable purposes. First, signs assist wayfinding in buildings, such as at the Anita Purves Nature Center. Second, signs identify important permanent elements of facilities, such as restrooms. Third, signs facilitate access by people with vision and physical limitations. Aside from consistent use of the District logo, we did not note a signage template.

The Access Board requires different treatment for 2 types of signs. Signs for permanent spaces, such as a bathroom, must be in both Grade 2 Braille and raised lettering.

For directional or informational signage though, only raised lettering is required. Be certain to incorporate these approaches into signs in buildings and sites operated by the District.

1. ***Develop a sign template*** in 2011 that describes where and in what facilities signs will be used. The template could include size of sign, mounting height, mounting location, size of characters, space between characters, contrast between characters, and background, icons or symbols used in the signs, District information in the signs (name of facility? Phone number? Main office number?), and more.
2. ***Implement signage template and correct or refresh*** District facility and site signage in 2012 or 2013.

Bathrooms

Bathrooms are an essential part of a visit to an Urbana Park District facility. Exercise, food and beverage, social activities, and more all rely on one of the oldest designs known to us. Making those facilities accessible is tremendously important.

Additionally, ***portable toilets*** placed temporarily at sports fields and event venues ***must*** be accessible and ***must be served by an accessible route***.

1. ***Develop a bathroom template in 2011.*** Confirm it with the City of Urbana and the Illinois Attorney General. Be sure to include temporary facilities such as portable toilets in the template. The template should address the toilet, grab bars, items in the stall such as toilet paper and hooks, the stall, operating mechanisms, mirrors, sinks, hand towels, hand dryers, and more.
2. ***Include bathroom renovations*** in facilities in the District's Capital Acquisition and Replacement Plan.
3. ***Consider the use of automatic flush controls.*** These have environmental benefits and are also a great way to eliminate some accessibility problems.
4. ***In the interim, implement non-structural modifications recommended in each section of this report,*** such as lowering mirrors, remounted grab bars, changing the height of toilets and urinals, installing compliant stall hardware, and so forth. These less costly changes on a site-by-site basis will serve your customers well until resources are available to renovate restrooms on a comprehensive scale.
5. ***Make one portable toilet, if provided at a site, accessible.*** This includes a portable toilet placed at a picnic shelter or adjacent to sports fields. These must be accessible and must be served by ***an accessible route. The District has quite a few sites with portable toilets and this is critical to address.***

Lockers and Locker Rooms

Research shows that people with disabilities will refrain from using public facilities if they fear that sites are not accessible or they'll be embarrassed in their attempt to use sites.

We all know the benefits of recreation participation. If a person with a physical disability comes to the Urbana Indoor Aquatic Center to swim, there are no designated accessible lockers.

1. ***Implement the locker room changes recommended*** at the Urbana Indoor Aquatic Center and Brookens Gymnasium.
2. ***Promote availability of accessible locker rooms once completed.*** Announce these changes to the community and see more participated by people with disabilities.

Alarms

In existing facilities where an aural or audible fire alarm system is provided, a visual alarm is not required unless the building was constructed after January 26, 1992 or has been upgraded since that same date.

If an alarm in an existing facility is audible only, it need not be modified to include a visual alarm unless it is replaced or upgraded in the future.

1. ***Determine in 2011*** if systems have been upgraded or replaced since 1992.
2. ***Develop a plan in 2011*** for the installation of aural and visual alarms in renovations.
3. ***Retrofit construction that has occurred since 1992*** to include aural and visual alarms by the end of 2014.

Brochures

The park grid in the District brochures is an important tool for Park District residents and can now be used to communicate about accessibility. Revise it to incorporate the access work District staff completes and indicate in your grid where, for example, the accessible picnic areas are, or where the accessible playgrounds are.

1. ***Update parks and facilities grid*** to reflect decisions made by the District regarding our recommendations, and note which sites are accessible or will be made accessible.

Website

The Title II regulation requires that all types of public communication used by the District be available to people with disabilities. Many people with vision impairments use websites every day with the aid of technical equipment.

The District should evaluate its website and make necessary changes so that the website can be read by that type of equipment.

1. ***Evaluate the District website*** and make changes so that the information on the site is accessible to people with disabilities.

Swimming

The ***minimum required*** of the District by Title II of the ADA is that the "program" of swimming be accessible to residents. This is measured by the "program access test" described in section 35.150 of the Title II regulation (see 28 CFR Part 35).

The District has one indoor pool at the Urbana Indoor Aquatic Center currently operating. The pool at Crystal Lake will be renovated as well. The District has options in this regard. Those are:

A. It must make the renovations at the Crystal Lake pool comply with the 2010 Standards and therefore be accessible;
B. It can therefore make Crystal Lake pool and the Urbana Indoor Aquatic Center pool accessible by implementing the recommendations in the report; and
C. It can choose to leave the Urbana Indoor Aquatic Center pool as it is until it is later modified or renovated.

We recommend B, making Urbana Indoor Aquatic Center accessible as well as the pool to be completed at Crystal Lake.

Playgrounds

The ***minimum required*** of the District by Title II of the ADA is that the "program" of playgrounds be accessible to residents. This is measured by the "program access test" described in section 35.150 of the Title II regulation (see 28 CFR Part 35).

For similar multiple sites, no guidance is given as to how many existing playgrounds should be made accessible. Again, a good practice is to treat this as a planning exercise and aim for 1 of 3 playgrounds being made accessible.

Our evaluation included 14 different playgrounds for children aged. Of these, 4 are accessible, and 3 more could be made accessible with minor corrections.

1. ***Make corrections*** cited in these reports so the playgrounds at the site below ***remain*** accessible:
    a) ***AMBUCS Park***
    b) ***Carle Park***
    c) ***King Park (2-5 and 5-12)***
2. ***Make Corrections*** cited in these reports so the playgrounds at the sites below ***become*** accessible:
    a) ***South Ridge Park (2-5 and 5-12)***
    b) ***Victory Park***
3. ***Leave as is*** the other playgrounds at the parks named below, and if future alterations or renovations occur at those sites, make them accessible:
    a) ***Blair Park***
    b) ***Crestview Park***
    c) ***Crystal Lake Park***
    d) ***Meadowbrook Park***

e) ***Sunnycrest Tot Lot***
f) ***Wheatfield Park***
g) ***Phillips Recreation Center***

4. ***Advertise the accessible playgrounds*** in the District website and publications.

Baseball Fields

The ***minimum required*** of the District by Title II of the ADA is that the "program" of baseball be accessible to residents. This is measured by the "program access test" found in section 35.150 of the Title II regulation (see 28 CFR Part 35).

For similar multiple sites, no guidance is given as to how many existing baseball fields should be accessible. We recommend that a minimum of one field of every three be accessible. We saw 6 sites with 11 total ball fields. Of these, 3 fields are accessible. While this doesn't meet the one of three, we feel that it is adequate and recommend no new access.

1. ***Make corrections*** cited in these reports so baseball fields at the sites below ***remain*** accessible:
    1. ***AMBUCS Park (1 of 2)***
    2. ***Prairie Park (2 of 3)***
2. ***Leave as is*** the fields at the following sites:
    1. ***AMBUCS Park (1 of 2)***
    2. ***Blair Park (3 of 3)***
    3. ***Busey Woods Park***
    4. ***Canaday Park***
    5. ***Chief Shemauger Park***
    6. ***Prairie Park (1 of 3)***
3. ***Advertise the accessible baseball fields*** in the District website and publications.

Basketball Courts

The ***minimum required*** of the District by Title II of the ADA is that the "program" of basketball be accessible to residents. This is measured by the "program access test" described in section 35.150 of the Title II regulation (see 28 CFR Part 35).

For similar multiple sites, no guidance is given as to how many existing basketball courts should be accessible. Because of the nature of basketball surfaces, a hard court, access is easier. The District has 3 sites with courts. Of those, 1 of the 3 is accessible, and one can be made accessible with route modification.

1. ***Make the corrections*** needed to ***maintain*** accessible basketball courts as specified in the reports for the site below:
    a) ***Victory Park***
2. ***Make the corrections*** needed to ***create*** access to the basketball courts as specified in the reports for the site below:
    a) ***Phillips Recreation Center***
3. ***Leave as is*** the basketball court at the site below:
    a) ***Chief Shemauger Park***
4. ***Advertise the accessible basketball courts*** in the District website and publications.

Tennis Courts

The ***minimum required*** of the District by Title II of the ADA is that the "program" of tennis be accessible to residents. This is measured by the "program access test" described in section 35.150 of the Title II regulation (see 28 CFR Part 35).

For similar multiple sites, no guidance is given as to how many existing tennis courts should be accessible. Because of the nature of tennis surfaces, a hard court, access is easier. The District has 4 sites with 12 courts. Of those, 3 are accessible; ***we are recommending no new access.***

1. ***Make the corrections*** needed to maintain accessible tennis courts as specified in the reports for the sites below:
    a) ***King Park (2 of 2)***
    b) ***Victory Park***
2. ***Leave as is*** the tennis courts at the sites below:
    a) ***Blair Park (7 of 7)***
    b) ***Wheatfield Park***
3. ***Advertise the accessible tennis courts*** in the District website and publications.

Volleyball Courts

The ***minimum required*** of the District by Title II of the ADA is that the "program" of volleyball be accessible to residents. This is measured by the "program access test" described in section 35.150 of the Title II regulation (see 28 CFR Part 35).

For similar multiple sites, no guidance is given as to how many existing volleyball courts should be accessible. We recommend one of three be made accessible. The District has 2 sites with 3 courts.

Of those, none are accessible; ***we are recommending access be created to the volleyball court at Carle Park and that the courts at Crystal Lake Park be left as is.***

1. ***Advertise the accessible volleyball courts*** in the District website and publications.

Athletic Fields

The ***minimum required*** of the District by Title II of the ADA is that the "program" of athletic fields be accessible to residents. This is measured by the "program access test" found in section 35.150 of the Title II regulation (see 28 CFR Part 35).

For similar multiple sites, no guidance is given as to how many existing athletic fields should be accessible. We recommend that a minimum of one field of every three be accessible. There are 5 sites with a total of 12 athletic fields and none are accessible. We recommend access to two of the fields at the Prairie Park.

1. ***Make the corrections*** cited in the reports so that the athletic fields at the site below ***become*** accessible:
    a) ***Prairie Park (2 of 8)***
2. ***Leave as is*** the athletic fields at the following sites:
    a) ***Blair Park***
    b) ***Carle Park***
    c) ***Lohmann Park***
    d) ***Prairie Park (6 of 8)***
    e) ***Wheatfield Park***
3. ***Advertise the accessible athletic fields*** in the District website and publications.

Picnic Shelters/Picnic Areas

The ***minimum required*** of the District by Title II of the ADA is that the "program" of picnic shelters be accessible to residents. This is measured by the "program access test" described in section 35.150 of the Title II regulation (see 28 CFR Part 35).

For similar multiple sites, no guidance is given as to how many existing picnic shelters should be accessible. ***Of the 17 sites with existing picnic shelters/picnic area, 5 are accessible. 8 more can be made accessible with the addition of accessible tables.***

1. ***Maintain the accessible*** picnic shelters/areas at the sites named below:
    a) ***AMBUCS PARK (1 of 5)***
    b) ***Blair Park***

c) ***Carle Park***
d) ***Leal Park***
e) ***Victory Park***

2. ***Purchase tables as*** cited in the reports so that the picnic shelters/areas at the sites ***become*** accessible:
   a) ***AMBUCS (2 of 5)***
   b) ***Crestview Park***
   c) ***Crystal Lake Park (2 of 3)***
   d) ***King Park***
   e) ***Meadowbrook Park (2 of 2)***
3. ***Leave as is*** the picnic areas at the sites below:
   a) ***AMBUCS Park (2 of 5)***
   b) ***Busey Woods***
   c) ***Canaday Park***
   d) ***Chief Shemauger Park***
   e) ***Lohmann Park***
   f) ***South Ridge Park***
   g) ***Sunnycrest Tot Lot***
   h) ***Wheatfield Park***
   i) ***Phillips Recreation Center***
4. ***Advertise the accessible picnic/shelter areas*** in the District website and publications.