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Introduction

The American's with Disabilities Act (ADA) was signed into law on July 26, 1990. Among the requirements of the law was a provision for public entities, such as the Saint Paul Parks and Recreation Department, to develop a transition plan. The Transition Plan must identify all structural modifications necessary for buildings and facilities to ensure programs, services and activities are accessible to people of all ability levels. While the Saint Paul Parks Department did not meet the established deadline of 1992 for completion of its Transition Plan, work began years ago to ensure accessibility of our buildings and facilities, and the important task of incorporating that work into a formal plan which does meet the requirement of the ADA has been accomplished with the writing of this document.

The Saint Paul Parks and Recreation Department currently manages recreation facilities all over the City of Saint Paul including:

- Twenty-five Recreation Centers
- One indoor and two outdoor pools
- A public beach
- One 18- and one 9-hole golf course
- The Como Zoo and Conservatory
- Over 100 athletic fields
- An outdoor archery range
- More than a dozen shelters and pavilions
- Miles of walking and biking trails

From 1991 to the late 1990s the department's ADA efforts were largely decentralized, focusing primarily on reasonable accommodation for employees and securing inclusion companions for participants in our Adaptive Recreation Programs. Beginning in the late 1990s, our Design and Construction staff incorporated accessible building design standards even before laws required their implementation as new recreation centers were brought on line. During this time the department did not maintain a centralized transition plan.

In collaboration with the City's ADA Compliance Committee, Parks staff and colleagues from other City and State departments, the Parks and Recreation Department has increased its level of accountability for work related to accessibility and believes our buildings and facilities reflect that effort. 2006 marked the first year Parks Operations and Maintenance staff began including accessibility as a measure during annual play area audits. In 2009, the City of Saint Paul added an ADA Coordinator, as well as an ADA Committee that included representatives from multiple City Departments. In 2013, department staff was provided with the support they needed to conduct accessibility assessments at all Parks facilities that were used as public polling places during elections. In 2017, facility assessments were completed at all 25 recreation centers, Phalen Beach, indoor and outdoor aquatic facilities, the Como Visitor Center, our Central Service Facility, the Municipal Athletics Office, and scheduled play areas.

While there is more work to do, this plan represents what our focus will be over the next 1-5 years as we work to ensure equitable access to our buildings and facilities. It identifies work completed, outlines plans for improved access and keeps us focused on clearly defined goals.

ADA and its Relationship to Other Laws

There are a number of laws related to the ADA that are considered by our Design & Construction staff, Operations and Maintenance staff, and our Programming staff as decisions are made about new construction, routine and preventative maintenance or repairs, and on-going community programming. The list below includes some of the laws and standards most critical to our work:

- 2004 ADAAG (American's with Disabilities Act Accessibility Guidelines)
- The Title II regulations in 28 CFR 35
- ASTM F 1292-99 Standard Specification for Impact Attenuation of Surface Systems Under and Around Playground Equipment
- ASTM F 1292-04 Standard Specification for Impact Attenuation of Surfacing Materials Within the Use Zone of Playground Equipment
- ASTM F 1487 Standard Consumer Safety Performance Specification for Playground for Public Use
- ASTM F 1951-99 Standard Specifications for Determination of Accessibility of Surface Systems Under and Around Playground Equipment
- ADA Accessibility Guidelines for Play Areas (Nov. 2000)
- Consumer Product Safety Commission (CPSC) Public Playground Safety Handbook

Parks Design Principles and Values

Community Engagement

A Community Engagement Strategy was developed in 2016 by the Parks and Recreation Design and Construction staff in response to the need for a more efficient and effective process garnering input on design of public spaces. The common result of the outdated, but established community design process was the attendance and contribution of an overwhelmingly homogenous and small portion of the community rather than a representative sampling of the demographics of any given park's service area. Upon soliciting local district councils and neighborhood recreation centers for individuals interested in participating on design advisory committees, typical attendees at meetings of this nature were older, white, female, able-bodied residents, many of whom no longer had young children who would ultimately benefit from the redevelopment of a play area, athletic field, or recreation center. The Community Engagement Strategy was developed as a tool to help Design and Construction project managers conduct more inclusive outreach efforts, as well as to advance equity and social justice for both participation in design advisory activities and project outcomes.

Having this planning tool as part of our project management template has opened a whole new world for us. It formalizes our work on advancing social equity and provides a tool for our project managers as they begin work on a new project. This work was recognized by an Award of Excellence from the Minnesota Recreation and Park Association in June of 2017. Although it initially began as one of many focused efforts related to racial equity, it has proven to promote thinking about other perspectives that promote inclusiveness for our aging population and others who are, or may become, less mobile.

Inclusive Design

Long before the March 2012 requirement that all new construction comply with the 2010 Standards for State and local governments, Parks Design and Construction staff implemented accessible design standards as new recreation facilities came on line. Examples include: Dayton's Bluff Recreation Center opening in 1999, North Dale Recreation Center opening in 2002 and the Wellstone Center opening in 2006. Although a few minor upgrades will be recommended as part of our transition plan, these accessible facilities offer multiple recreation options for people of all ages and abilities to fully participate. Since 2012, accessible design has been at the forefront of all new design and construction projects as well as during significant facility renovation work.

Parks and Recreation Vision Plan

Saint Paul has one of the finest park and recreation systems in the United States and wants to ensure it stays that way. Released in 2008, the Parks Vision Plan outlines five strategies to help make Saint Paul the most livable city in America: create active lifestyles; create vibrant places; maintain a vital environment by responding creatively to change; innovate with every decision; and connect the entire city. There are most definitely challenges to keeping parks vital, accessible, safe and sustainable. Funding is one of those challenges. This Transition Plan outlines improvements that will require both small and large investment. Recognizing that we do not have unlimited resources, the plan still focuses on improving access and maintaining the high quality parks system our residents and visitors have come to expect.

Saint Paul ADA Committee and Support Structure

The City's ADA Coordinator is housed in the Department of Human Rights and Equal Economic Opportunity. The City's ADA Coordinator is responsible for receiving and referring accommodation requests and complaints from the public to the appropriate department for a response. She also handles ADA-related grievances. She is responsible for coordinating the City's ADA Committee and tracking the overall progress and implementation of department plans. Two Parks employees are currently part of the City ADA Committee, the Design and Construction Manager and a member of our contract compliance team.

Responsibility for the implementation of the Parks ADA Transition Plan will be shared by the Design and Construction Manager, the Operations Manager, and the Recreation Services Manager. The Design and Construction Manager, along with her Senior Landscape Architects ensure compliance with laws and standards and provide executive leadership and technical support for project staff. In addition, these leaders and our project managers are available to staff and the community to present options that address accessibility during the design/development phase of a project. Our Operations Manager and his team are responsible for on-going maintenance and repairs in Parks facilities, as well as annual tot lot audits and repairs. The Recreation Services Manager will need to consider equipment purchases for recreation centers and other program support provisions such as temporary accessible restrooms at field locations.

The work of the Parks and Recreation Department is supported by our Parks and Recreation Commission. As an appointed body, the commission functions to review and provide feedback on policy, approve resolutions in advance of City Council approval, advocate for programs and otherwise represent the broader community of St. Paul residents on matters involving parks. The Parks Commission meets monthly on the second Thursday.

The Mayor's Advisory Council for Persons with Disabilities (MACPD) is responsible for advising and making recommendations to the Mayor and City Council regarding problems and issues facing persons with disabilities, as well as opportunities for making positive change. The fourteen-member committee is specifically focused on issues related to employment, education, and accessibility. The MACPD meets monthly on the third Tuesday.

The City Council has approval authority for policy, contracts, and budget amendments. They meet weekly on consent agenda items as well as recognitions and other City business. Public hearings are held on the first and third Wednesdays as separate meetings.

Saint Paul is a strong-mayor City. The Mayor has final approval on the City's budget and other matters of implementation for large-scale capital projects, department director hires, and City response to critical issues.

Facility Evaluation

Parks has identified eleven areas that will be required to have and maintain an ADA evaluation and an on-going record of assessment: polling places; recreation centers; aquatic facilities; parking lots; municipal athletics office and related fields; Como Visitor Center; Como Central Service Facility; picnic shelters; play areas; golf courses; and special facilities. Due to the far reaching and on-going implications of the ADA, Parks initially focused its evaluation on facilities with the highest number of visitors and largest public exposure to identify issues and propose solutions that will have the greatest initial impact. Evaluations of other facilities will be part of our plan for 2018/19 and become incorporated into our on-going work.

Polling Places

In collaboration with Ramsey County, Saint Paul Parks and Recreation provides space at recreation centers throughout the city as polling places during local, state, and federal elections. In 2013, using an ADA Checklist for Polling Places per Title II, recreation center staff set out to conduct facility audits at all recreation sites used by the County for elections. The sites listed in this plan were evaluated. All sites were in compliance with the guidelines provided or are able to implement options on the day of the election that meet accessibility guidelines.

- Battle Creek Recreation Center
- Conway Recreation Center
- Dayton's Bluff Recreation Center
- Edgumbe Recreation Center
- El Rio Vista Recreation Center at the Wellstone Center
- Groveland Recreation Center
- Hancock Recreation Center
- Hayden Heights Recreation Center
- Hazel Park Recreation Center
- Hillcrest Recreation Center
- Jimmy Lee Recreation Center
- Langford Recreation Center
- Linwood Recreation Center
- Martin Luther King Recreation Center
- Merriam Park Recreation Center
- North Dale Recreation Center

Since the 2013 evaluations, Hillcrest has experienced a significant renovation, re-opening in 2015, and thus will need to be re-evaluated. The Arlington Hills Community Center, opened in 2015, and the Palace Community Center, opened in 2016, have been added as polling places and will also need to be evaluated.

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Recreation Centers

In 2017, all recreation centers operated by the City were evaluated using the 2010 standards for State and local governments, which consist of the Title II regulations at 28 CFR 35.151 and the 2004 ADAAG at 36 CFR part 1191, appendices B and D. The evaluations focused on a few primary elements: accessible parking and an accessible route to the facility and/or athletic fields; an accessible entrance; an accessible restroom for each gender or a single unisex restroom; accessible drinking fountains; accessible fitness equipment; physical support for full participation in arts and other classroom-based activities; and accessible telephones where a public phone was provided.

Although some minor improvements will be suggested in the Corrections section of the Parks plan, with very few exceptions, the Parks facilities are accessible and support full participation by all. As would be expected, the accessibility challenges for this department represent a direct correlation with the age of a facility in almost all cases. Challenges with funding for major renovation or facility replacement may hinder the department's plans to move ahead as quickly as desired, but will not hamper the department's commitment to make improvements where feasibly possible.

Facility	Year-built/renovation
Arlington Hills CC	2015
Battle Creek	2000
Dayton's Bluff	1999
Duluth & Case	1977
Edgcumbe	1986
El Rio Vista	2006
Groveland	1980
Groveland Warming Room	1957
Hancock	1988
Hayden Heights	1983
Hazel Park	1997
Highland Park CC	2015
Jimmy Lee	2007
Langford	1987
Linwood	1991
Martin Luther King	2002
McDonough	1992
Merriam Park	1958/1972
North Dale	2002
NW Como	1975
Palace	2016
Phalen	2002
Rice and Teen Zone	1978/2007
Scheffer	1973
West Minnehaha	1984/2003
Wilder	1983/2002

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A few recreation center facilities are operated by Saint Paul Parks and Recreation but owned by the Saint Paul Public School District or the Public Housing Authority. Renovations at these sites will be funded and implemented by other agencies: Groveland, Hancock, McDonough, and NW Como. The commitment of the Parks and Recreation Department is that a copy of the ADA assessment for these sites is provided to the School District and the PHA.

Aquatic Facilities

In 2017, all aquatic facilities operated by the City were evaluated using the 2010 standards for State and local governments, which consist of the Title II regulations at 28 CFR 35.151 and the 2004 ADAAG at 36 CFR part 1191, appendices B and D. The evaluations focused on a few primary elements: accessible parking and an accessible route to the facility; an accessible entrance; an accessible restroom for each gender or a single unisex restroom; accessible drinking fountains; accessible entry for pools; accessible dressing rooms and shower facilities; and accessible telephones where a public phone was provided.

Although some minor improvements will be suggested in the Corrections section of the Parks plan, with very few exceptions, the Parks facilities are accessible and support full participation by all. The aquatics facilities operated by Parks have all been replaced or experienced significant renovations within the last ten years. Prior to the recent renovations, all of the aquatic facilities were more than 40 years old. These construction projects provided an opportunity to significantly upgrade these Parks amenities.

Facility	Year built/renovation
Como Pool	2012
Great River Water Park	2008
Highland Park Aquatic Facility	2011
Phalen Beach House	2017

Parking Lots

In 2017, Parking lots adjacent to all recreation centers and aquatic facilities operated by the Parks Department, municipal athletics main office, the Como Visitor's Center and the Como Central Service Facility were included in the evaluation. Lots were evaluated using the 2010 standards for State and local governments, which consist of the Title II regulations at 28 CFR 35.151 and the 2004 ADAAG at 36 CFR part 1191, appendices B and D. The evaluations focused on accessible parking; an accessible route to amenities and activities; and drop-off, curb, and ramp requirements. This is an area where multiple opportunities for improvements will be noted in the Corrections Section of the department's Transition Plan.

Municipal Athletics Office and Adjacent Fields at Rice & Arlington

The main building at the department's Rice & Arlington Athletic Complex was opened in 1997. The old restroom and support building was built in 1975. The newer building meets most compliance requirements, including accessible restrooms. The old building does not and temporary accessible restrooms are required to support seasonal programs.

Como Visitor's Center

Opened in 2005, the Como Visitor's Center on the Como Campus is the primary support building for the Como Education programs, large group meetings, small conferences, receptions, and also houses the Visitor's Service staff as well as the Gift Shop operated by the Como Friends. It is the only entrance to the main zoo grounds. Approximately three million guests pass through the Visitor's Center each year, making it one of the most visited places in Minnesota, second only to the Mall of America! Open 365 days a year, it is a hub of activity and supports all of the other visitor services on the zoo grounds. Significant changes were made to the forecourt and entrance areas during 2016 and 2017, improving access and pedestrian safety for all Como visitors. A new drop-off area, sidewalks, and re-configured parking lot access, along with re-alignment of an intersection, are among the highlights related to the ADA evaluation. Additional gardens and greenery make a trip to the Visitor Center and adjacent historic Conservatory even more spectacular than before.

Additional ADA assessments will be conducted on the Zoo grounds during 2018/19. The Polar Bear Odyssey and Outpost Lodge were new facilities on the grounds in 2010. The Gorilla Forest opened as a new exhibit in 2013 and plans are underway for a new exhibit for Seals and Sea Lions as well as a new facility for Lancer, the on-site food service provider. The Seals and Sea Lions exhibit is nearly 60 years old, so this will provide yet another opportunity for significant upgrades and improvements – not only for our guests and visitors, but also for the animal collections and the zookeepers who work with them.

Como Central Service Facility

The Como Central Service Facility houses most of the department's Operations staff. It is not a facility heavily used by the public, but it is a site for the issuance of some of our permits, union and grievance meetings, meetings with vendors, and will become a site for most of our safety training, so it was included in the 2017 evaluation schedule. Some parts of the facility were built in the late 1800s. It has been renovated multiple times and a portion of the facility is under renovation again. The corrections outlined in our plan will improve the facility's accessibility for both visitors and employees.

The City Hall Annex

The City Hall Annex (floors 4 and 5) serve as the main offices for the Parks Administration, Finance, Design and Construction, Support Services, and Recreation Services Divisions. Parks staff interacts with the public in a variety of ways in this setting including: meetings, accessing park permits, and general inquiries. The City Hall Annex is managed by the City's Real Estate Department. The space is compliant with accessibility guidelines with the exception of front counter height and audible signals for each floor when arriving by elevator.

Play Areas

The Parks and Recreation Department currently manages and maintains 76 play areas. CPSC guidelines suggest that play areas be audited for safety and accessibility when built as a new play area, when new equipment is added, or when there is a major renovation. The Parks Department currently inspects all play areas every two weeks and completes a major audit of each play area every five years on a rotating schedule.

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Correction Program

The Saint Paul Parks and Recreation Department is committed to addressing barriers identified in the self-evaluation process. As self-evaluations are completed, assessments will become part of the department record. Facilities that are accessible, but do not meet Title II standards will continue to be improved through the department's routine maintenance program if possible. Facilities that are inaccessible or have barriers, will be prioritized by potential impact and the department's ability to make reasonable and effective corrections. For larger scale projects, the funding and schedule of accessibility improvements will be determined by the City's Capital Improvement and Capital Maintenance budgeting processes.

2018/19 Action Items	Estimated cost	Estimated Completion	Actual Completion
Parks ADA Transition Plan Approval		March, 2018	
Repair drinking Fountain at Duluth & Case	\$400	March, 2018	
Rearrange fitness equipment to improve accessibility at: Battle Creek Dayton's Bluff Edcumbe Linwood	Staff time	March, 2018	
Move changing table from accessible stall at AHCC restroom	\$150	April, 2018	
Add restroom signs to include Braille letters mounted at 48-60" from the floor at: Groveland Warming Langford Merriam PK Muni Office West Minnehaha	\$60/site	April, 2018	
Complete self-evaluations at: Highland 9 Golf Course Highland 18 Golf Course Highland Driving Range	Staff time	May, 2018	

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2018/19 Action Items	Estimated cost	Estimated Completion	Actual Completion
Adjust restroom water flow in sink faucets to 10 seconds at: Battle Creek Hayden Hts Hazel Park McDonough	\$100/site	June 2018	
Lower one mirror and one soap dispenser to no more than 40" from the bottom in each restroom at Como VC	\$250	June, 2018	
Move accessible sign in East lot at Como Pool to align w/ accessible space	\$50	June, 2018	
Complete polling place evaluations at AHCC, Highland CC, and Palace	Staff time	July, 2018	
Accessible door installation at Harriet Island (entry and restrooms)	\$14,500	July, 2018	
Add Braille signs for all activity areas at West Minnehaha	\$150	August, 2018	
Add Braille sign for elevator at North Dale	\$25	August, 2018	
Re-stripe lot at Edgumbe to add properly sized accessible space, aisle and sign	\$500	August, 2018	

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2018/19 Action Items	Estimated cost	Estimated Completion	Actual Completion
Adjust accessible parking signs to 60-66” at the bottom at: Como Pool main lot Como Central Service Como VC main lot Duluth & Case El Rio Vista Hayden Heights Highland Pk Aquatic Jimmy Lee Linwood McDonough Merriam Park Muni Athletics Office North Dale Phalen Beach Rice & Arlington 4 * West Minnehaha	\$75/site	September, 2018	
*Will need new pole			
Equipment purchases to include a few chairs w/ arms and a few w/casters for programming sites	\$1000	September, 2018	
Replace accessible parking signs at Muni (Old Bldg lot)	\$450	October, 2018	
Replace broken accessible sign and adjust other sign heights to 60-66” at bottom at Merriam Park	\$100	October, 2018	
Add accessible space and signage near rec center entrance at Merriam Park	\$350	October, 2018	

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2018/19 Action Items	Estimated cost	Estimated Completion	Actual Completion
Add “no parking” sign paint to van accessible aisles at: AHCC Battle Creek Como Pool (all lots) Como Central Service Como VC – main lot Dayton’s Bluff Duluth & Case El Rio Vista Hancock Hayden Heights Hazel Park Jimmy Lee – both lots Highland Aquatic Linwood McDonough Muni Office North Dale NW Como Phalen (Beach and Rec) Wilder	\$50/site	October, 2018	
Rebuild curb ramp to meet accessibility guidelines at Duluth & Case	\$650	October, 2018	
Complete self- evaluations at: Cherokee Shelter Como East Shelter Como West Shelter Crosby Shelter Eastside Heritage Shelter Harriet Island Pavilion Harriet Island Shelter Hidden Falls Shelter Highland Park Shelter Indian Mounds Park Shelter Newell Park Shelter Phalen Shelter	Staff time	October, 2018	

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2018/19 Action Items	Estimated cost	Estimated Completion	Actual Completion
Re-stripe part of lot at West Minnehaha to re-size van accessible aisle – add new sign for van accessible space, include “No Parking” in accessible aisle	\$250-500	November, 2018	
Complete scheduled play area audits	Staff time	November, 2018	
Complete self-evaluations at: Como Campus All zoo exhibits and Marjorie McNeeley Conservatory	Staff time	February, 2019	
Replace drinking fountain at Groveland	\$1500	June, 2019	
Complete scheduled play area audits	Staff time	November, 2019	
Complete renovation of West Minnehaha restrooms	\$55,300	December, 2019	
Complete re-build of Scheffer Recreation Center	\$11M	December, 2019	
2020/22 Action Items	Estimated cost	Estimated Completion	Actual Completion
Complete re-build of Como Seals and Sea Lions Exhibit and Lancer Food Service Bldg	\$15M	June, 2020	
Replace automatic entry Doors at Como VC	\$66,325	June, 2020	

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2020/25 Action Items	Estimated cost	Estimated Completion	Actual Completion
Re-build counters to include 36" section at: City Hall Annex	\$250	June, 2020	
Como VC	\$1200	June, 2020	
Hazel Park	\$1200	June, 2020	
Accessible door installation at Como Central Service Facility	\$8000	December, 2021	
Complete scheduled Play area audits	Staff time	November, 2020	
Complete scheduled Play area audits	Staff time	November, 2021	
Complete scheduled play area audits	Staff time	November, 2022	

Training

As part of the adoption of the Parks ADA Transition Plan, the department will be conducting agency-wide training with all supervisors on design, policy, and on-going evaluation. The Parks Expanded Staff meetings which occur in every month that has a fifth Tuesday will be used as the forum for training. Report-backs and follow-up will be conducted with Recreation Services and Aquatics staff who conducted the self-evaluations as to findings, proposed corrections, and the Transition Plan so that progress can be tracked. Operations staff will make most of the repairs and improvements suggested in this plan with the exception of the two large building projects at Como and Scheffer. Accessible design will be at the forefront of both projects.

The Parks Operations Division currently has four Certified Playground Safety Inspectors (CPSIs) trained to identify and document ADA compliance issues at play areas (tot lots) managed by the department. An additional six staff members are trained but have not yet attained certification. Ten members of the Operations team will be attending CPSI training in March, 2018. The CPSI course is offered by the National Recreation and Parks Association.

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Transition Plan Approval Process

December, 2017	Plan review by the City's ADA Coordinator
January, 2018	Preliminary report to the Parks and Recreation Commission as an action item for 2018
January, 2018	MACPD agenda for discussion and approval
February, 2018	Final approval by Parks and Recreation Commission
March, 2018	Final approval by Saint Paul City Council