

HURON-CLINTON METROPARKS ADA TRANSITION PLAN 2025-2030

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EXECUTIVE SUMMARY

This update to the American Disabilities Act (ADA) Transition Plan is part of a comprehensive effort to identify and remove barriers to improve accessibility and inclusivity in the Metroparks and to fulfill the Metroparks' mission to "bring the benefits of parks and recreation to the people of southeast Michigan. All the people. All their lives." and core value to "make the Metroparks available to all in the region, regardless of race, income, gender, or ability".

The American with Disabilities Act (ADA) is a Federal Law that requires government agencies ensure that people with disabilities have the same rights and opportunities as everyone else. This Plan will provide the means and timeframe expected to assist with the annual budgeting process to identify prioritized projects based on this Plan.

In the Summer of 2023, updates to the Transition Plan began with a preliminary review of the ADA access of all park buildings, playgrounds, picnic facilities, parking lots, trails, programs, services, and activities and was completed by the Fall of 2024. A multi-departmental collaboration developed the updated Plan which included stakeholder participation through open houses, online survey, social media, and staff training regarding ADA Title II compliance. Facilities were evaluated for architectural barriers using the 2010 ADA Standards. Inspection reports were developed for each facility that included identification of barriers and recommendations for the solution. Also, programs, services, and activities (PSAs) are administered through an annual process to plan and evaluate the logistics, outcomes, and accessibility. This helps the Metroparks continually improve and so that the process is documented and able to be referenced in future event/program planning. A GIS database of accessibility improvements is also recommended for capturing current data collected, such as ADA checklists, and is intended to be integrated with the Metroparks' GIS asset management tool.

The ADA Transition Plan is a living document that can be modified over time based on the Metroparks priorities and available resources. The Plan will be updated every 5 years for adjustments and priorities to remove barriers as well as programs and services created to provide greater accessibility for park visitors.

An ADA transition plan is a requirement of the civil rights law for government agencies with 50 or more employees. 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.

INTRODUCTION

This Americans with Disabilities Act (ADA) Transition Plan provides an update on progress made to improve accessibility for people with disabilities in our park system. Since our initial plan was published in 2019, we have made significant strides in removing barriers and improving accessibility. However, there is still work to be done to ensure that all members of our community can fully and equally enjoy the recreational opportunities our parks offer.

The purpose of this Transition Plan is to document the accessibility improvements we have made so far and to identify remaining barriers and prioritize solutions. We are committed to using this plan to systematically remove physical, programmatic, and structural barriers to ensure our parks, trails, playgrounds, sports fields, restrooms, and other facilities are usable and accessible to all.

The Metroparks is committed to improving access for people with disabilities. As part of our ADA Transition Plan update, we acknowledge there are barriers that currently limit accessibility. For example, the size of our parks and the location of facilities can be difficult to navigate. Also, most our facilities were built well before the 1990 law. Even with these limitations, our goal is to reduce and eliminate these barriers over time through improvements, modifications, and upgrades.

We look forward to continuing our progress toward making our park system as accessible and inclusive as possible. With your feedback and input, we can work together to improve the accessibility of our parks so they can be enjoyed by everyone.



ACCOMPLISHMENTS

COMPLETED PROJECTS

Since 2019, the Metroparks have implemented a variety of projects that improve accessibility. These include restroom fixture updates that took place in 2024, which focused on installing accessible stall handles on ADA stalls, updating ADA restroom signs, adding sink pipe insulation, and adjustment of coat hooks and mirrors to the appropriate heights. The Metroparks also addressed some of the more problematic entry doors to restroom facilities that didn't meet ADA standards. Parks have also focused on improving picnic shelter accessibility by fixing picnic tables to the ground to ensure proper turning radii and access pathway widths. Several universally accessible playgrounds have been installed since 2019 including; Maple Beach Playground at Kensington Metropark, Woods Creek Playground at Lower Huron Metropark, and Adventure Playground at Indian Springs Metropark. Many more ADA improvements have been made throughout the system and those are detailed in Appendix 2 by park.

While ADA improvements have been made annually with capital improvement, major maintenance (over \$10,000), and minor maintenance (under \$10,000) projects, the Metroparks have also received grants to focus specifically on renovating or providing new universally accessible recreation amenities. Some examples in each of our three districts include:

Oakwoods Accessible Trail Renovation: The project focused on resurfacing and widening a nature trail at Oakwoods Metropark. The scope included additional barrier-free parking, electric door openings for the nature center, renovations to make the restrooms entirely accessible, walkway resurfacing, renovation of the observation deck and new park amenities including universally accessible (UA) benches, bike racks, picnic tables, bottle-filling station, pet waste station, interpretive and directional signage.

Kensington West Boat Launch Renovation: This project looked at renovating a facility to include a new floating canoe/kayak launch area, barrier-free parking, picnicking, and other park amenities including native landscaping, accessible walkways, signage, and a pet waste station. The project also included a new accessible vault restroom facility for the launch area.

Lake St. Clair Accessible Launch: This was a new facility that was added to Lake St. Clair Metropark. The project utilized a portion of a largely unused section of the maintenance yard along the Black Creek Marsh and developed a new accessible paddle launch. The launch provides separation from the motorized boat launch for safety. In addition to installing the

ACCOMPLISHMENTS

floating launch, the project includes ADA parking with trailer spaces, ADA port-a-johns, and tree plantings. This facility is now utilized by our interpretive department who leads guided Voyageur Cruises for all ages in the Black Creek Marsh.

DiversAbility Days and Adaptive Sports Clinics

The Metroparks are committed to removing barriers, creating access and increasing recreation opportunities for all. DiversAbility Day is an outdoors adaptive recreation event in collaboration with Disability Network of Eastern Michigan and the Michigan Adaptive Recreation Coalition. This event is designed for individuals with disabilities to enjoy a variety of adaptive recreational activities including track chairs, archery, yard games, fishing, and more at Lake St. Clair Metropark.

Adaptive Sports Clinics teach participants skills for adaptive paddling, softball, and handcycling at Hudson Mills, Kensington, Lower Huron, and Stony Creek Metroparks.

Approximately 363 total participants in 2023.

Partners:

Disability Network of Eastern Michigan

Oakland County Parks – Adaptive Recreation department

UMAISE (University of Michigan Adaptive & Inclusive Sports Experience)

RIM Foundation- SportAbility

Wheelchairs In Motion

Got Ability Sports/Great Lakes MTB Adapted

PEAC

MiABLE- financial sponsorship for adaptive rec series

TRAINING

In addition to the accomplishments above, the Metroparks has invested in extensive staff training for the entire organization. ADA training at the Metroparks is in the purview of the Diversity, Equity, and Inclusion (DEI) Department. In addition to the Chief of DEI, the department has staff that completed the ADA Coordinator Training Certification Program Certificate from University of Missouri in 2023. The Chief of Planning & Development completed a Certificate in Accessibility from the Epply Institute in 2021. As a team, our DEI department has developed and facilitated the following trainings.

ADA at the Metroparks (19 Sessions; Attended by 388 staff)—was a customer focused ADA training designed to achieve the following:

ACCOMPLISHMENTS

- increase our understanding of ADA and our associated responsibilities
- increase our awareness of common language related to ADA
- enhance communication related to ADA compliance
- increase awareness on the Metroparks ADA Transition Plan
- increase awareness of current ADA efforts and resources

ADA IN the Metroparks (6 Sessions; Attended by 122 staff)-was an internal training, co-designed by the Human Resources Department, required for all hiring personnel, focused on applicants and current employees designed to achieve the following:

- provide an overview of the ADA and its requirements regarding reasonable accommodations for applicants and employees with disabilities. This includes discussing key ADA definitions, interviews, requests, and requirements for medical documentation and confidentiality
- increase knowledge of reasonable accommodations for applicants and employees with disabilities that would enable them to perform the essential functions of the job.
- train hiring personnel and supervisors on appropriate and legally compliant questions to ask applicants regarding accommodation needs
- educate hiring personnel on the process for handling accommodation requests

Accessible Program Design Workshop (2 Sessions; Attended by 30 staff)-was a workshop, requested by Interpretative and Program staff, led by the Disability Network of Washtenaw, Monroe, and Livingston. The training workshops addressed core aspects of accessible program design including the following:

- Accessible presentation techniques, tips, and principles
- Educational setting, site, and classroom accessibility and modifications
- Disability specific techniques and approaches (including visual and hearing impairments, sensory issues, intellectual disabilities, etc.)
- Adaptive equipment and teaching tools, their use and possibilities
- How to make current programs and materials more accessible and develop more accessible future programs

2025-2030 GOALS & METRICS

The ADA transition plan has identified the following goals in alignment with other relevant plans – Individual park master plans, DEI Plan, Marketing Plan, Climate Action Plan, and Strategic Plan. These goals were confirmed with the stakeholder outreach and public input which were essential to the update to this plan.

1. Increase enrollment in accessible programs in the Metroparks, as measured through RecTrac up to 75%.
2. Implement at least one capital project each year that focuses on accessibility improvements. Improvements should aspire to follow Universal Design principles, where feasible.
3. Commitment to annual funding through budget process and an annual review of ADA remedies to identified barriers in this plan to measure and track progress over the next 5 years. Metrics include an annual board report, and progress documented in the 2030 ADA Transition Plan.



PUBLIC PARTICIPATION

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

Recent planning efforts gathered public input and stakeholder feedback on prioritizing facilities, PSAs, and identifying accessibility opportunities and issues. Metroparks staff facilitated an outreach strategy to obtain input on prioritization, preferred methods of finding accessibility-related information, and identifying other accessibility-related barriers. The Metroparks gathered input through several methods including a dedicated project webpage, social media posts, yard signs, StoryMaps with online surveys, focus group meetings, and open house events over the spring and summer of 2024. A detailed summary of the input received is included in Appendix 7: Public Input Summary.

INPUT OPPORTUNITIES OVERVIEW

Huron-Clinton Metroparks ADA Transition Plan Update Website

A page was hosted within the Metroparks website that described the project in detail, including a link to an interactive StoryMap and online survey for each park.

Social Media Post (Twice posted)

A link to the online survey was made available on the Huron-Clinton Metropark's social media pages.

Yard Signs

Temporary yard signs with a QR-Code link to the StoryMap/online survey were deployed throughout the park system during the summer of 2024. Park visitors were asked to scan the QR code and were directed to the the StoryMap/online survey for that specific park.

StoryMap with Online Survey (Duration of summer months)

An interactive StoryMap was developed for each Metropark. A virtual park tour allowed people to explore our facilities followed by a brief survey to assist in prioritizing future accessibility improvement projects and ensuring the Metroparks focused on the facilities and PSAs most important to them.

Open House Meeting #1 (Shelby Community Life Skills Centers Inc. June 7, 2024)

Approximately 50 attendees consisting of individuals that actively participate in disability programs and services provided by both New Gateways Inc., and Life Skills Center Inc. were asked what park facilities they would like the Metroparks to prioritize for accessibility improvements.

PUBLIC PARTICIPATION

Open House Meeting #2 (Genoa Township Park July 12, 2024)

Metroparks staff attended the Disability Network Livingston ADA Satellite Celebration at Genoa Township Park in Brighton, Michigan. Approximately 15 attendees provided feedback on park facilities they would like the Metroparks to prioritize accessibility improvements.

Event Participation, DiversAbility Day (Lake St. Clair Metropark, July 31, 2024)

Metroparks staff hosted a table at DiversAbility Days in partnership with the Michigan Department of Natural Resources and Oakland County. Staff provided intercept surveys and were asked what park facilities they would like to prioritize for accessibility improvements.

Open House Meeting #3 (Detroit Riverfront, August 5, 2024)

Metroparks staff planned to host a table at Detroit's Disabled have Talent in partnership with Detroit Disability Power. The event was cancelled due to weather, and instead, the survey was emailed out people on their email list and event registrants.

Stakeholder Input- FAIR Play Coalition (August 27, 2024)

The draft Plan was reviewed by FAIR Play Coalition and was followed by a focus group meeting to receive input from disability advocates. The meeting was held virtually with an overview of the draft Plan followed by a focus group exercise to provide input on the content and also how the Metroparks can work better towards achieving ADA goals.

Public Input- (September, 4 2024-October 12, 2024)

An opportunity for the public to review and provide feedback on the draft Plan was made possible by posting it on the Metroparks project webpage.

SELF-EVALUATION

FACILITIES

The most recent park maps were used to identify all facilities within each park. Field surveying was completed by 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 factors including the DOJ rankings, highest number of deficiencies, high-use facilities, high number of PSAs, and public input (See Appendix 2. Facilities Transition Plan). The field staff reported non-compliance with elements that are barriers, recommendations for compliance and a magnitude of costs to removal of barriers over the short term (1-5 years), mid term (5-10 years), and long term (over 10 years).

Depending on the barriers to be addressed, projects may be led by either maintenance staff or a professional engineer or architect to address the alterations required to achieve compliance. Once projects are slated for design phase, a review of the ADA Transition Plan will notify known issues and determine a more detailed scope of work. It is anticipated that a planned GIS-based asset management system will be a tool utilized to provide annual updates on progress with achieving compliance within the next five years.

PROGRAMMING, SERVICES, & ACTIVITIES

Title II of the ADA covers all programs, services, and activities of state and local governments including the Metroparks. Accordingly, 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 PSAs, as they pertain to ADA, including events, and actions undertaken by a Title II entity (the Metroparks) in the regular course of business. Policies are the principles that guide the Metroparks to implement and provide PSAs. Standard Operating Procedures (SOPs) are the specific methods that Metroparks staff should follow to ensure compliance with the policy. Examples include:

- Service Animal SOP
- Volunteer application
- Eligibility Requirements for Participation
- Disabled Veterans Policy

SELF-EVALUATION

The recommendation for PSAs is based on achieving program accessibility. This process is heavily reliant on both the public and internal staff to evaluate constantly changing programs which become outdated, modified, and establishment of new PSAs over time. Recent examples include the increasing demand for adaptive equipment with recreational activities to be made more available for everyone to enjoy the parks. An accessible hand cycle mountain bike is now available for rent at the Stony Creek Metropark Sheldon Multi-Use Trails. Also, the Adaptive Recreation Program series aims to make outdoor recreation accessible and enjoyed by all park visitors features a variety of inclusive activities for individuals with physical, cognitive, and sensory disabilities. Since the last update to the ADA Transition Plan, Detroit Disability Power consultants developed a self-evaluation ADA checklist for all PSAs. The resulting actions will be in a spreadsheet format that identifies any necessary modifications and established timeline.

It is recommended that staff prioritize facilities that have the highest number of PSAs within them. Modifications to policies and SOPs should be addressed by the department responsible formats including sign language interpreters, audio recordings, font sizes, and closed captioning on television.



SELF-EVALUATION

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 (elevated and ground level). In addition, staff performed ADA assessments with the checklist provided for play structures based on the 2010 Standards. The Metroparks 2023-2027 Community Recreation Plan includes an inventory of all playgrounds in each park, ADA assessments were conducted for large playgrounds where a quantity and variety of play elements typically are located. The goal will be to ensure full accessibility at these large playgrounds 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. Large 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 were 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



SELF-EVALUATION

PICNIC FACILITIES

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/or adding grills to a unit.

Picnic units with shelters were ranked higher than picnic units without shelters based on the methodology used in the prioritization. To rank picnic shelter units within a park, shelter rental revenue averages over the past three years were collected and ranked highest to lowest. The remaining proposed accessible picnic units were ranked after shelters based on numerous factors including; proximity to existing walkways, trails, parking lots, restrooms, fishing piers, pools, and other desired park features. Also, the feasibility and 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.

IMPLEMENTATION

ADA COORDINATOR & GRIEVANCE PROCEDURES

The Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 (“ADA”). It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the Metroparks. The Metroparks’ Personnel Policy governs employment-related complaints of disability discrimination.

Grievances can be submitted in writing or via video recording and must include the following information:

- The name, phone number and/or email of the person filing the grievance
- The location, date, and description of the occurrence

The grievance should be submitted by the customer or their designee as soon as possible but no later than 30 calendar days after the occurrence to:

Artina Carter

artina.carter@metroparks.com

OR Mail to:

Artina Carter

ADA Coordinator and Chief of Diversity, Equity and Inclusion

13000 High Ridge Dr.

Brighton, MI 48114

The ADA Coordinator or their designee will attempt to contact the customer within 15 calendar days after receiving the grievance to discuss the grievance. Within 15 calendar days, the ADA Coordinator will respond, in a format accessible to the customer.

IMPLEMENTATION

PRIORITIZATION PROCESS

While the Metroparks will undertake capital improvements to address the items in the 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 progress in achieving compliance with PSAs and facilities 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

In order to both assess the architectural elements of facilities for compliance and prioritize the removal of barriers, the 2010 Standards for Accessible Design (2010 Standards) were applied to parks and facilities recommended by the U.S. Department of Justice (DOJ). The priority system was modified to work better for the Metroparks built environment along with consideration from staff expertise and public input contributed to the adoption of this plan by the Board of Commissioners.

Facilities

The 2010 Standards address common elements of the “built environment” that had the DOJ recommend priorities, in order for barrier removal. The Metroparks modified this priority system to be applied for a regional park system. The first priority identified by 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 the 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.

IMPLEMENTATION

PRIORITY RANKING	
1	<p>Primary recreational visitor approach and entrance areas Areas with primary approach and entrances for visitors to parks that includes parking lots, building entrance, facility approach, picnic shelters</p>
2	<p>Access to Goods and Services recreational visitor areas Service counters, seating areas, golf patios, outdoor food bars</p>
3	<p>Restrooms that support Primary recreational visitor areas Restrooms</p>
4	<p>Secondary recreational visitor approach and entrance areas Mountain biking, equestrian trails, disc golf, picnic areas (non-shelter), water refill stations</p>
5	<p>Non-essential park user recreational support, facility services Park office, administrative office, rental center, concessions, police</p>
6	<p>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</p>
7	<p>Physical structural barriers in facilities that impede park employees but not general public Maintenance areas, dam facilities</p>

The Recreation Programming Committee

In 2022, a recreational programming committee was established to propose an annual programming action plan that would support the needs and goals identified in a Community Needs Assessment Survey. The committee was also charged to distribute resources equally across the five-county region and the City of Detroit. The Recreation Programming Committee provides an annual schedule of programs and events which includes self-evaluation. ADA improvements for compliance and recommended best practices are included in the self-evaluation for consideration. Programming under ADA Title II does not mandate every facility be 100% compliant with technical standards of ADA. However, it does require is that the Metroparks provide its program, services, and activities in the most accessible way as possible. The recreational programming committee submits what ADA improvements can be addressed during the budget development, based on self-evaluation forms have been completed over the past year (see Appendix 6. PSA Transition Plan).

IMPLEMENTATION

LOOKING AHEAD

This Plan includes the following recommendations to implement to better understand ADA barriers and solutions in working towards ADA compliance and beyond:

- Feedback from park visitors is essential to improve ADA compliance. It is recommended an accommodation request form to be used to track accommodation request from customers.
- Develop an ADA Committee to address accessibility issues, PSAs and physical barriers and provide recommendations to the Deputy Director to ensure compliance with accessibility. This includes communication to the public on Federal, State, and local laws and regulations related to ADA.
- Continue staff training and include demonstration trainings with any adaptive equipment being introduced within the parks and update accordingly on dedicated accessibility webpage.
- Trail maintenance is recommended to be included in the annual budget for ADA improvements.
- Highlight grant-assisted projects that go over and beyond ADA with Universally Designed elements to be included in annual updates and integrated with a planned GIS asset management tool within the next 5 years.

IMPLEMENTATION

ANNUAL UPDATES

The annual update is an ADA requirement that demonstrates the Metroparks progress on the Plan. The update process involves gathering and reporting on ADA improvements and helps build a culture of ADA compliance across all Metropark departments. The following components should be updated annually:

- Self-evaluation reporting of all construction projects involving ADA and their associated costs and barriers addressed.
- Incorporate ADA improvements into an asset management system.
- Summary of ADA training
- Number of ADA grievances and resolutions



CONCLUSION

In 2024, the Metroparks allocated \$70,000 from departmental budgets to be used to make ADA improvements in restroom facilities. Going forward, top priority projects will be folded into annual capital and major maintenance improvement projects.

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 are given access to Metroparks programs, services, and activities. The Metroparks will follow-up on actions recommended by the Transition Plan, by continually updating the Transition Plan documenting its efforts in compliance with the ADA. Further refinements will take into account from staff input, public engagement, and stakeholder and public review of the draft ADA Transition Plan that was made available on the Metroparks website.

The Metroparks are committed to providing safe and accessible facilities and services for all ages and abilities.



APPENDIX 7: PUBLIC INPUT SUMMARY



