



## **Accessibility Management Plan Overview**

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# **Perry's Victory and International Peace Memorial**

Commonwealth Heritage Group, Inc., and  
National Center on Accessibility

**AUGUST 2018**



# Executive Summary

The goal of the Perry's Victory and International Peace Memorial Accessibility Management Plan is to identify existing barriers to accessibility and provide a roadmap of actions that will improve accessibility park-wide. The process of developing the plan was based on the requirements of Section 504 of the Rehabilitation Act of 1973, as amended, as applies to the U.S. Department of the Interior. Section 504 prohibits discrimination based on disability in federally conducted programs of the Department of the Interior. Specifically, Section 504 regulations state that "no qualified [person with a disability] shall, on the basis of [their disability], be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity conducted by the agency."<sup>1</sup>

Design and accessibility consultants led the process for the development of the accessibility management plan, based on the requirements of Section 504. The process can be understood as comprising three parts: a self-evaluation, an accessibility assessment, and the preparation of recommendations for improving accessibility.<sup>2</sup>

## Self-Evaluation

A self-evaluation is a process by which the park, assisted by the accessibility consultant, assesses the current state of accessibility of its own programs and activities to disabled visitors and employees. During the self-evaluation at Perry's Victory and International Peace Memorial (PEVI), park staff identified the following ten key park experiences to be addressed in the plan:

1. Learning about the War of 1812, the construction of the monument, and the ongoing peace and friendship between the U.S., Canada, and Britain, through viewing the interpretive film and museum exhibits at the visitor center;
2. Viewing the battle site, Put-In-Bay, Lake Erie, Lake Erie Islands, and other area attractions in a 360-degree view from the observation deck of the Memorial column;

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<sup>1</sup> U.S. Department of Labor, Section 504, Rehabilitation Act of 1973 (29 U.S.C. § 701), Sec. 17.530; accessed January 4, 2018.

<sup>2</sup> This plan fulfills a park planning priority for facility asset management at Perry's Victory and International Peace Memorial and serves as a component of the park's planning portfolio. Perry's Victory and International Peace Memorial planning portfolio consists of individual plans, studies, and inventories, which together guide park decision making. The planning portfolio enables the use of targeted planning documents (such as this one) to meet a broad range of park planning needs and fulfill legal and policy requirements. The PEVI Accessibility Management Plan remains a critical piece of the park's planning portfolio, and will continue to be updated and/or supplemented in a timely manner through the development of additional park planning documents.

3. Experiencing and participating in living history events, including demonstrations of historic weapons, carronade firings, and camp life, and hands-on practice of trade skills connected to the War of 1812 era held on the Memorial grounds;
4. Attending performances held on the upper and lower plazas of the Memorial building;
5. Attending Junior Ranger programs and ranger talks in the visitor center, Memorial grounds, and Memorial building;
6. Learning about the burial crypt where six officers killed in the Battle of Lake Erie are entombed in the Memorial building;
7. Making social connections through community events, volunteerism, youth engagement, and educational programs held in the visitor center and Memorial grounds.
8. Viewing the sunset or sunrise over Lake Erie and Put-In-Bay from the Memorial building's upper and lower plazas, and the Memorial grounds.
9. Enjoying and learning about the natural environment of the lake and other ecosystems in the visitor center and Memorial grounds; and
10. Purchasing souvenirs and books about the park in the visitor center's gift shop.

The park identified which park areas are associated with each experience and identified barriers to accessibility to each of these experiences.

## Accessibility Assessment

For the accessibility assessment, the design and accessibility consultants visited every park area associated with the ten key park experiences and assessed the level of physical and programmatic compliance to the requirements of the Architectural Barriers Act (ABA) Standards of 2015.<sup>3</sup> In addition to these key park areas, the consultants also evaluated areas of the park not open to the public, including staff housing and offices.

### Physical Accessibility

Recurring findings of barriers to physical accessibility within the park were primarily associated with key park experiences made available to the public, particularly at the park visitor center and at the Memorial building, the most popular feature of the park. At the visitor center, there is no accessible route from the adjacent parking lot to the main entrance (west) and no van-accessible parking spaces. In addition, there is no accessible route from the east entrance door, which leads to the Memorial. At the Memorial building, there is no accessible route to its lower and upper plazas, nor to the observation deck at the top of the Memorial column. In addition,

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<sup>3</sup> "Architectural Barriers Act (ABA) Standards (2015);" <https://www.access-board.gov/attachments/article/1029/ABASTandards.pdf>; accessed June 14, 2018.



the public restrooms at the basement level of the Memorial building are not accessible. Finally, within the park, some sidewalks exhibit cracking, heaving, or other damage that presents a barrier to accessibility.

## Program Accessibility

The main findings related to PEVI's ability to meet program accessibility requirements under Section 504 generally concern interpretive exhibits in the visitor center, publications, films, event announcements, special events, ranger-led tours, experiencing views of the battle site, experiencing views of the lake and landscape, interpretive waysides on the observation deck of the Memorial building, and the park website.

Exhibits in the visitor center were often not accessible to people who are blind or have low vision, due to the exclusive use of text and graphics without accompanying audio descriptions or alternative text. In addition, there are no tactile experiences to help a person who is blind or has low vision to understand the full interpretive message within the exhibits. Park publications were not available in alternate formats such as Braille, large print, audio, and electronic.

The park film was open captioned for people who are deaf or are hard of hearing, but the audio description track was not correct for the film being shown. Assistive listening devices were available for the film in the visitor center theater, but not available for the videos in the exhibit area. In addition, portable assistive listening devices were not available for visitors taking part in ranger-led tours or special events, nor was audio description provided for persons with vision impairments for ranger-led interpretive tours.

As mentioned above, the main attraction of the park, the Memorial building, is not physically accessible, and there are currently no program alternatives for individuals with mobility impairments who cannot physically get to the lower and upper plazas, the rotunda, or the observation deck. For those with disabilities who can access the observation deck, the interpretive waysides lack tactile components and audio descriptions of the interpretive information. The park has a Project Management Information System (PMIS) statement for funding the installation of an interactive video monitoring system that would provide the views from the observation deck on interactive computer screens located in the visitor center.<sup>4</sup>

Finally, the accessibility page of the park website provides incorrect information on accessible features, and little or no information on requesting accessibility accommodations (e.g., sign

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<sup>4</sup> A PMIS statement provides proposed project background information for NPS funding requests with the Department of Interior, the Office of Management and Budget (OMB) and Congress. The narrative provided in the PMIS identifies project needs and projected budgets and requests non-recurring and some recurring project funding.

language interpreters, real-time captioning, or alternate formats for print materials), accommodation of service animals, and accessible tours.

## Recommendations

### Physical Accessibility

Recommended improvements to physical accessibility include re-striping of parking areas to include van-accessible parking, identification of accessible routes, repair of sidewalks with large cracks and/or upheaval, replacement of sidewalks and ramps that exceed the allowed accessible slope, and addition or modification of accessible identity and information signs. Improvements were also recommended for areas not open to the public, such as housing and park offices. In the case where non-compliance was identified, the recommendations should be implemented when an employee with a disability needs accommodation.<sup>5</sup>

### Program Accessibility

Recommended improvements to programmatic accessibility focus on providing access to the various programs, activities, and services offered at Perry's Victory for individuals with sensory and cognitive impairments. Recommendations include acquiring assistive listening systems for both live programs and static exhibits to benefit those who are hard of hearing, creating an audio described tour of the park and adding tactile opportunities to benefit those with visual impairments, and improved exhibit text size and contrast for those with low vision or reading disabilities. Additional recommendations include adding signage informing visitors of accessible features, repairing the park film's audio description, and acquiring alternate formats of publications such as brochures and handouts.

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<sup>5</sup> Compliance in association with the National Environmental Policy Act and the National Historic Preservation Act is not part of this plan and will be addressed on a case-by-case basis as the plan is implemented.

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# Chapter 1: Introduction

## Goal of the Plan

In 2000, the National Park Service (NPS) issued *Director's Order #42: Accessibility for Visitors with Disabilities in National Park Service Programs and Services* (DO42). DO42 sets out the NPS' goal of ensuring that people with disabilities have the highest level of accessibility that is reasonable to their programs, facilities, and services in conformance with applicable regulations and standards.

The goal of the Perry's Victory and International Peace Memorial (PEVI) Accessibility Management Plan (AMP) is to identify existing barriers to accessibility and provide a roadmap of actions that will improve accessibility park-wide. The process of developing this plan was based on the requirements of Section 504 of the Rehabilitation Act of 1973, as amended, as applies to the U.S. Department of the Interior. Section 504 prohibits discrimination based on disability in federally-conducted programs of the Department of the Interior. Specifically, Section 504 regulations state that "no qualified [person with a disability] shall, on the basis of [their disability], be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity conducted by the agency."<sup>1</sup>

The AMP is based on the results of the park's self-evaluation and a physical assessment. It provides PEVI staff with a tool for addressing overall needs associated with making the park accessible when viewed in its entirety. Rooted in an understanding of key park experiences, the AMP establishes a methodical process that identifies, prioritizes, and outlines improvements to park accessibility. It proposes strategies for implementation to facilitate all aspects of a successful accessibility compliance program and in a manner consistent with park requirements and protocols.

Primary responsibility for implementation and integration of the plan rests with the park superintendent. The park-designated accessibility coordinator is responsible for communicating with park employees on plan implementation, reports back to the superintendent on its progress, documents improvements completed, and keeps the plan updated.

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<sup>1</sup> U.S. Department of Labor, *Section 504, Rehabilitation Act of 1973* (29 U.S.C. § 701), Sec. 17.530; accessed January 4, 2017.

## Description of the Park

Perry's Victory and International Peace Memorial (PEVI) is a 25-acre national park located in Put-In-Bay, Ohio, on South Bass Island in Lake Erie, near the United States-Canada border (Figures 1-1 and 1-2). Located on a 250-yard-wide isthmus in the approximate center of the island, the park is organized around its central, Beaux-Arts-style feature, a 352-foot-tall granite column set on a terraced platform (the "memorial building") from which landscaped grounds extend to the east and west (Figures 1-3 and 1-4). Visible for miles from both the United States (U.S.) and Canada, the memorial column stands as a reminder not only of the events of the War of 1812, but also as a symbol of international peace between Great Britain, Canada, and the U.S.

The park was established to commemorate the War of 1812 naval victory by Master Commandant Oliver Hazard Perry and the American fleet over the British, and to stand as a tangible symbol of lasting peace between Canada and the United States. The memorial was constructed between 1912 and 1926, and funded by nine U.S. states, with matching federal funds. On July 6, 1936, Congress charged the NPS with preserving and managing the memorial as a unit of the national park system.

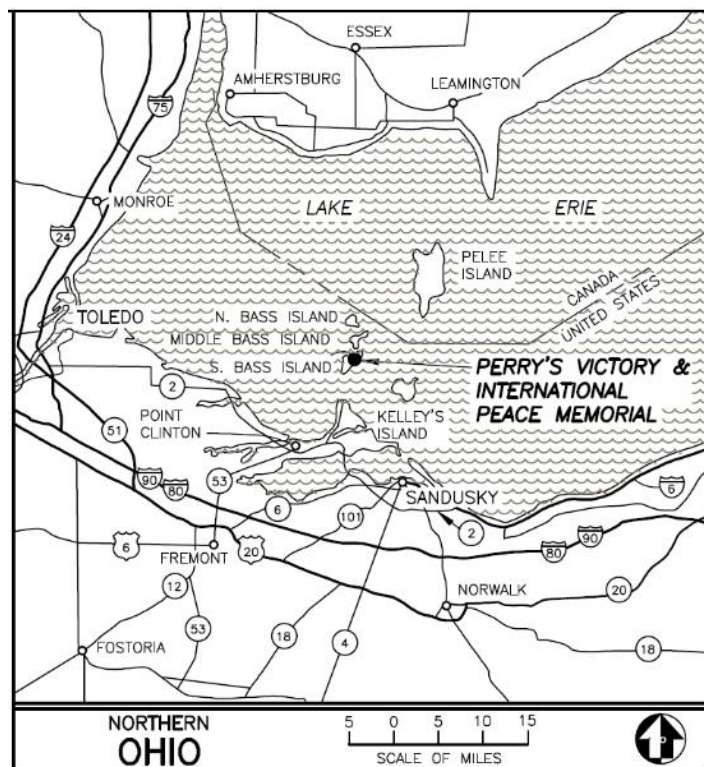


Figure 1-1. Location of the park within the context of Lake Erie. PEVI.



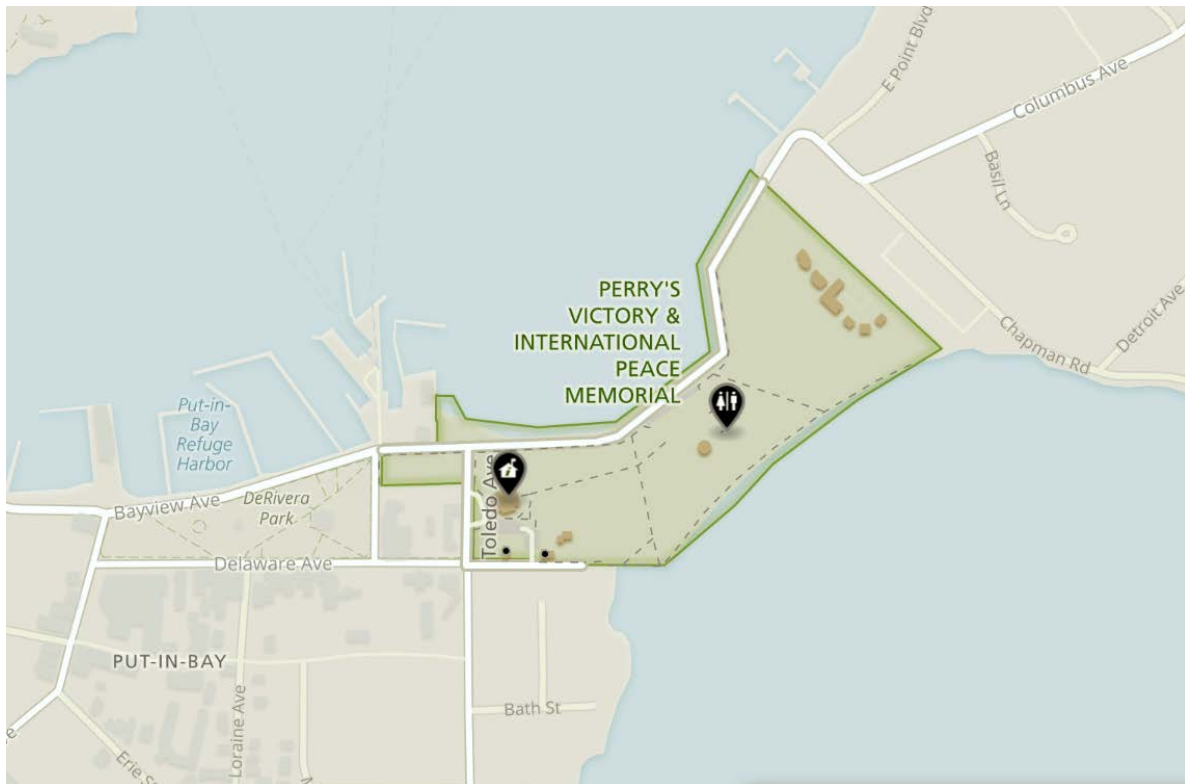


Figure 1-2. Location and extent of the park on South Bass Island. PEVI.



Figure 1-3. View of the Memorial column from across Put-in-Bay. Commonwealth.





Figure 1-4. View of the Memorial building and column from the park visitor center. Commonwealth.

Since the construction of the memorial building, the size of the park has grown from its original 12.5 acres to the current 25 acres. The 14.5-acre historic core of the site, which also contains features constructed after 1926, has been listed on the National Register of Historic Places. The grounds of the historic core comprise a commemorative, designed landscape associated with the Beaux Arts style of design. Significant features include the memorial building, open lawns, remnant trees and shrubs, sloped terraces, sidewalks, and seawalls. The rest of the 25-acre park contains the visitor center, administrative offices, a park maintenance facility, and staff housing. It also includes a parcel called the “Peace Garden,” for which a formal design has been completed and which will be installed as soon as funds become available.

## Purpose and Significance of the Park

### Purpose

The purpose of Perry’s Victory and International Peace Memorial is derived from the enabling legislation of June 2, 1936 (49 Stat. 1393), establishing the park. As described by the park’s 2012 foundation document:

The purpose of Perry’s Victory and International Peace Memorial is to

- preserve the memorial and its cultural landscape;

- preserve the historical associations connected with the Battle of Lake Erie, the War of 1812, and the memorial, acknowledging that these associations involve shared history;
- inculcate the lessons of international peace by arbitration and disarmament.

Park staff works to achieve this purpose by communicating the story of the battle and people involved, preserving the resources of the park, and educating visitors in the lessons of peace.<sup>2</sup>

The story of the battle is shared by the park through visitor center exhibits, interpretive signage, living history events, ranger-led tours, self-guided tours, and events aimed at education of the community and special groups, such as the Boy Scouts. Protection of resources is ongoing and is currently focused on preservation and restoration of the monument column and its supporting terraces. Visitors will be educated on the lessons of peace through the future development of the proposed Peace Garden.

The park's visitor center presents artifacts from the Battle of Lake Erie, models of the battle, and other exhibits that describe the battle and its context. Artworks about the battle are also on exhibit, including paintings and a large sculpture of Oliver Hazard Perry. Throughout the day the visitor center screens a 15-minute film covering the history of the battle. Visitors are also encouraged to explore the memorial column; from its observation deck, visitors can view the site of the Battle of Lake Erie, other Lake Erie Islands, and the shores of Ohio, Michigan, and Ontario, Canada. A virtual view of the same is available on the park website. Other programs include living history demonstrations, lifeways of the early 1800s and firing demonstrations of reproduction flintlock muskets. These occur on the weekends during the summer season, as do firing demonstrations of a reproduction 32-pound carronade (cannon). Ranger programs offer interpretive talks during the week on a wide array of topics, including the history of the battle, the history of the design and construction of the memorial column, natural sciences, and other topics. Junior Ranger activities include hands-on demonstrations offered daily during the summer season.<sup>3</sup>

## Significance of Perry's Victory and International Peace Memorial

The Perry's Victory and International Peace Memorial has been described in the park's 2012 Foundation Document as significant because:

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<sup>2</sup> NPS Midwest Regional Office, *Perry's Victory and International Peace Memorial Foundation Document*, 3.

<sup>3</sup> Perry's Victory and International Peace Memorial, "Things to Do," accessed October 13, 2017.

- This battle, fought between American and British naval forces, was a decisive American victory in the War of 1812 for forces under the command of Oliver Hazard Perry, who launched the battle from the strategic safe harbor at South Bass Island.
- The victory precipitated events with both personal consequences for individuals involved in the battle and far-reaching results for nations involved in the War of 1812 [including] settlement patterns (as tribes were removed making way for territorial expansion) and international relations (as peace was achieved through the Treaty of Ghent).
- The memorial serves as a symbol of international peace and a constant reminder of the ongoing cooperation between former enemies. It was an engineering marvel of its time and an architectural statement to memorialize the battle as well as the centennial of lasting peace between Britain, Canada, and the United States. Commissioned by nine states and located on South Bass Island, the location is symbolic for being within sight of the undefended border.
- The lasting results of peace symbolized by the memorial include the realization of turning enemies into allies through disarmament and arbitration and the benefits of international cooperation.
- The memorial offers the ability to interpret war from multiple perspectives in acknowledgement of our shared history.

## Accessibility Management Plan Process

The methodology for this accessibility management plan was based on that of a “transition and action plan,” which is mandated by regulations under Section 504 of the Rehabilitation Act of 1973, as they apply to the US Department of the Interior. These regulations state that “[n]o otherwise qualified handicapped individual in the United States . . . shall, solely by reason of his handicap, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance.” It specifically requires parks to document architectural barriers, solutions, and time frames for making improvements to increase accessibility and to make any necessary modifications to its programs, policies and procedures.

Design and accessibility consultants led the process for the development of the accessibility management plan, based on the requirements of Section 504. The process can be understood as comprising three parts: a self-evaluation, an accessibility assessment, and the preparation of recommendations for improving accessibility.

With assistance from the design and accessibility consultants, the park staff evaluated its own programs, policies, and procedures by which it serves the stated purpose of the park. They began by identifying key park experiences and where those key park experiences occur; then, they identified the services, activities, and programs that support these key park experiences and evaluated how well the park made them accessible.

This was followed by an assessment of park facilities completed by the design and accessibility consultants. Based on these findings and the park's self-evaluation, the consultants developed recommendations for improving physical access within the park, as well as access to services, activities, and programs. The recommendations were prioritized to form an action plan to be used by the park in the future.

This draft accessibility management plan was shared with the public in two public open house presentations held in July 2018, one at the PEVI visitor center on South Bass Island and the second at the Lake Erie Shores and Islands Visitor Center on the mainland in Port Clinton. The public was notified via a news release issued by PEVI staff. The public had no comments to make on the plan during the open house presentations.

After the final draft plan was prepared, PEVI notified the public of the opportunity to review and comment on the draft plan via the NPS Planning, Environment and Public Comment page (PEPC) from [to be added] and hard copies of the plan were made available upon request. Comments received and addressed in the final plan included [to be added].

## Self-Evaluation

The self-evaluation is a process led by park staff to examine their programs, policies, and procedures to identify barriers to accessibility. The accessibility consultant assisted the park in conducting the self-evaluation, which follows three primary steps, described in more detail, below.

### **Identify key park experiences**

Key park experiences are those that are the most important for visitors to have to understand the purpose and significance of the park. These key experiences are grounded in the park legislation and can be identified through a consideration of the park purpose and significance, along with themes identified in its long-range interpretive plan, and the programs and activities highlighted on the park website and in other communications with the public.

The following key park experiences were identified by park staff for the Perry's Victory and International Peace Memorial:

- Learning about the War of 1812, the construction of the monument, and the ongoing peace and friendship between the United States, Canada, and Britain, through viewing the interpretive film and museum exhibits at the visitor center;
- Viewing the battle site, Put-In-Bay, Lake Erie, lake islands, and other area attractions in a 360-degree view from the observation deck of the Memorial column;
- Experiencing and participating in living history events, including demonstrations of historic weapons, carronade firings, and camp life, and hands-on practice of trade skills connected to the War of 1812 era held on the Memorial grounds;
- Attending performances held on the upper and lower plazas of the Memorial building;
- Attending Junior Ranger programs and ranger talks in the visitor center, Memorial grounds, and Memorial building;
- Learning about the burial crypt where six officers killed in the Battle of Lake Erie are entombed in the Memorial building;
- Making social connections through community events, volunteerism, youth engagement, and educational programs held in the visitor center and Memorial grounds.
- Viewing the sunset or sunrise over Lake Erie and Put-In-Bay from the Memorial building's upper and lower plazas, and the Memorial grounds.
- Enjoying and learning about the natural environment of the lake and other ecosystems in the visitor center and Memorial grounds; and
- Purchasing souvenirs and books about the park in the visitor center's gift shop.

Although the focus of this report addresses key experiences aimed at the visitor, consideration has also been made to the provision of accessible work and living spaces for park staff. For this purpose, the team also evaluated park offices and maintenance facilities, as well as typical on-site living spaces.

### **Identify all park areas where key park experiences occur**

In this step, the consultant identified park areas where key park experiences occur. A “park area” is a location within the park that is regularly used by visitors. The following park areas were identified within the Perry's Victory and International Peace Memorial (see Figure 2).

- Visitor center;
- Memorial; and
- Historic landscape;

The consultant assessed each building, including parking and accessible routes, as well as the condition of accessible routes within the historic landscape.

## **Identify services, activities, and programs in each park area**

Park staff, working with the consultant, identified all services, activities, and programs that occur within each park area. This process ensured that all amenities within each park area would be evaluated during the accessibility assessment. The lists of services, activities, and programs were the basis for conducting the assessments, which include both physical and programmatic elements, and documenting all elements as they pertain to providing improved accessibility.

## **Accessibility Assessment**

The consultants assessed physical and programmatic barriers within each park area. The team determined the levels of access for each identified service, activity, and program for people with cognitive, mobility, vision, and hearing disabilities. The team defined the three general levels of access as:

- Level 1: a physical or programmatic barrier where program participation is usable by most participants with disabilities;
- Level 2: a physical or programmatic barrier where program participation is possible with assistance or modification; and
- Level 3: a physical or programmatic barrier that prohibits participation in a program.

While on the site, the team evaluated, discussed, and recorded existing conditions and barriers to services, activities, and programs, to determine the current level of access for each type of disability. The team then developed a reasonable range of actions recommended, with access solutions using universal design principles of primary concern. Barrier-specific solutions and alternative overall access solutions were considered, including either physical changes to the facility or an addition of alternate format ways of providing the experience. When it was not possible to eliminate all physical barriers due to historic preservation concerns or topography, programmatic alternatives were considered with a goal to provide access to the key experience for as many visitors as possible.

The team's findings from this work, preliminary options, and conceptual plans are organized below by park area for ease of use in implementation.

## **Accessibility Management Plan**

The accessibility management plan was developed first as a draft for park review. Next, the report was revised to a final draft overview for public review and final draft with implementation strategy for park review. After the public review period, the report was finalized in both overview form and as a finished report with its implementation strategy provided separately for use by the park. The implementation strategy makes specific

recommendations to improve accessibility, and identifies the time frame for completion of each improvement and the parties responsible for each project.

Implementation strategy development requires strategic coordination of improvements that takes into consideration not only the assessed level of access for each park area, but also the activities and requirements of park operations. Time frames for making improvements are as follows:

- Short-term (0-3 years): If the improvement does not require supplemental NPS project funding, park staff will initiate the elimination of the barrier internally; or, if a project is currently scheduled for funding, the improvement will be incorporated into the project and the barrier eliminated.
- Mid-term (3-7 years): The park will develop a proposal and submit it for those projects requiring supplemental NPS project funding in the next service-wide budget call (service-wide budget calls happen annually). For those projects requiring supplemental NPS project funding, the park will submit a request in the next budget call. Improvements will be scheduled dependent on the year of receipt of funding. If the improvement does not require supplemental NPS project funding, park staff will continue the elimination of the barrier internally.
- Long-term (>7 years): The park will eliminate the barrier when other work is taking place as part of facility alterations or as a component of a future planned construction project.

The time frames proposed for the actions presented below are based on current knowledge, but may change as priorities and funding availability shift.



# Chapter Two: Implementation Strategy

## Introduction

The Architectural Barrier Act (ABA) of 1968 requires that any building or facility designed, constructed, altered, or leased with federal funds be accessible and usable by any individuals with disabilities. In 1984, the Uniform Federal Accessibility Standards (UFAS) were adopted for federal facilities. In 2005, the Architectural Barriers Act Accessibility Standards (ABAAS) were adopted for federal facilities. Subsequently in 2013, standards for outdoor developed areas were added to ABAAS in Chapter 10.

Depending on the date of a building's construction or alteration, different design standards would apply (i.e., pre-1984, post-1984, post- 2006, or post-2011). The 2015 ABAAS standards were used in conducting these assessments for ease of using only one standard. Although a barrier may be identified by the current assessment for improvement, facilities constructed pre-1984, or between 1984 and 2013, are only required to comply with the standard in place at the time of construction and/or alteration, and may not be in violation of ABAAS. However, any renovation or upgrade of that building will be required to meet the most current standard at the time of work.

This section is organized with each park area as a subsection. Under each subsection is a description of the facility, a site plan, a floor plan (if available), and a narrative implementation strategy. Site plans and floor plans illustrate existing conditions and recommended improvements for each priority park area using a numbering system. The narrative is organized by use, such as parking, accessible route, and restrooms. Barriers to accessibility for each use are described and recommendations made to eliminate these barriers or improve accessibility. Each item is numbered to coordinate with the same presented in the Implementation Table attached to the end of this section. Included in each description of the implementation strategy is a reference to the relevant section of the Architectural Barriers Act (ABA) Standards of 2015. Section numbers beginning with an "F" indicate the section provided in the scoping requirements, which describes specific goals, and those without an "F" provide details of how these requirements are to be met, including specific dimensions, sizes, and locations of site and building features and their components.

Recommended improvements for park policies, practices, communication, and training are included. During the implementation phase, reassessment of the project site conditions and consultation with the Architectural Barriers Act Accessibility Standards (ABAAS) is strongly recommended to ensure that specific design and programmatic solutions are addressed correctly. Assistance is available at the Denver Service Center and through the Midwest Region Accessibility Coordinator.

## Visitor Center

### Site Plan

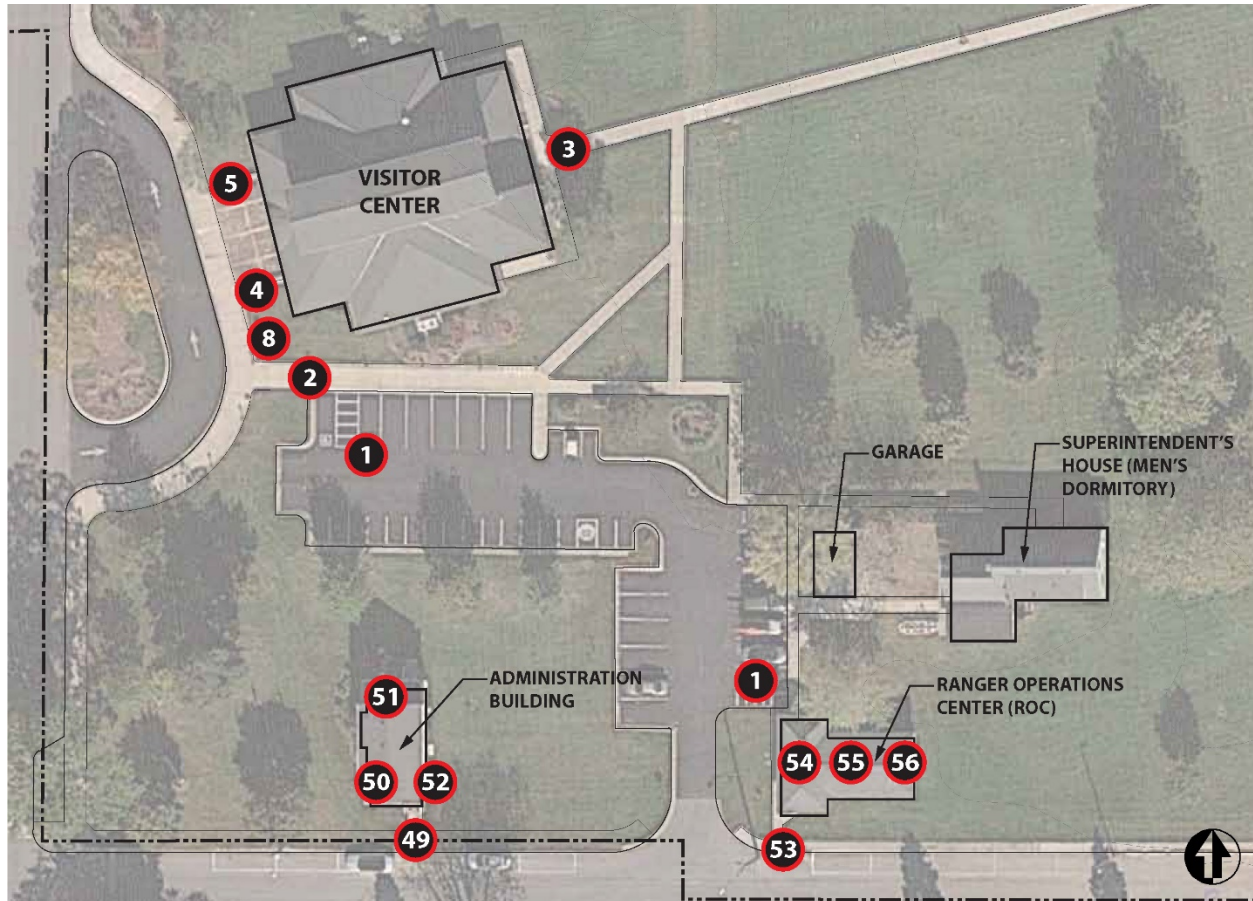


Figure 2-1. Visitor center area site plan, also showing the administration building, superintendent's house (men's dormitory), and the ranger operations center (ROC). Commonwealth.

## Floor Plan

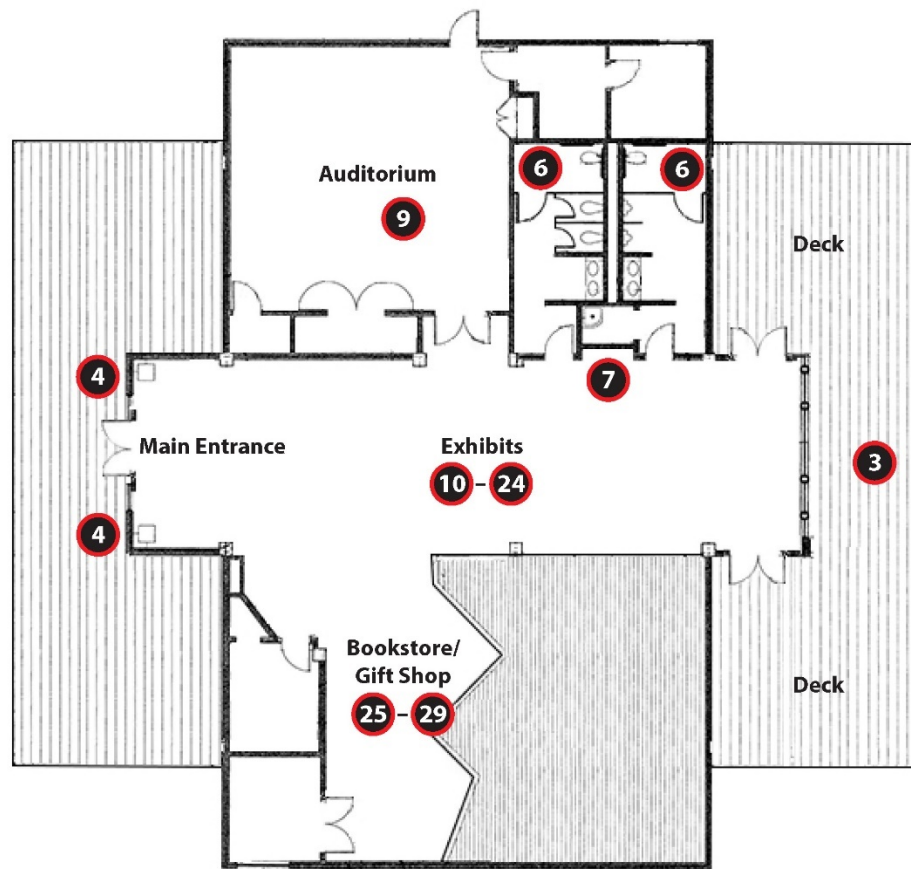


Figure 2-2. Visitor center floor plan.

## Implementation Strategy

The visitor center is usually the first contact that the visitor has with park staff, since most visitors approach the park from Put-In-Bay's downtown area, or from the ferry exit. The key park experiences provided at the PEVI visitor center are:

- Learning about the War of 1812, the construction of the monument, and the ongoing peace and friendship between the U.S., Canada, and Britain, through viewing the interpretive film and museum exhibits;
- Attending Junior Ranger programs and ranger talks;
- Making social connections through community events, volunteerism, youth engagement, and educational programs;

- Enjoying and learning about the natural environment of the lake and other ecosystems; and
- Purchasing souvenirs and books about the park in the gift shop.

The existing services that support those activities and programs include car and golf cart parking, a drop-off circle drive, an outdoor accessible route from the parking lot and drop-off, trash and recycling containers, museum objects and exhibits, a video about the Battle of Lake Erie, drinking fountains, restrooms, a multipurpose meeting room (where the video is shown), an information counter, and a gift shop. The following improvements to accessibility recommended:

## Facilities

- 1) Accessible Parking: There are 22 car parking spaces, including three accessible spaces adjacent to the visitor center, in a lot that provides parking for both the visitor center and the ROC (see Figure 2-1). The minimum number of accessible spaces required for a total of 22 spaces is one (ABAAS F208.2, Minimum Number, and Table F208.2, Parking Spaces). At least one space for every 6, or fraction of 6, accessible spaces must be van accessible (ABAAS F208.2.4, Van Parking Spaces). Currently, the three accessible spaces provided in this lot are sized for cars; two are close to the visitor center and one is close to the ROC; none of these are van-accessible. In addition, none of these accessible spaces are signed as such (ABAAS F216.5, Parking). The following actions are required:

- Re-stripe the parking lot to provide for at least one van-accessible space, which must be a minimum of 132" wide, with an access aisle at least 60" wide (ABAAS 502.2, Vehicle Spaces). Alternatively, the van-accessible space can be 96" wide if the access aisle is at least 96" wide (ABAAS 502.2, Vehicle Spaces, Exception). The van-accessible space should be one of the two closest to the visitor center. However, better access can be provided for staff requiring accommodations for a disability if the car-accessible space next to the ROC is also re-striped for van parking because, without it, the main door into the ROC would be over 200' from the one planned van space close to the visitor center, which would conflict with ABA standards (ABAAS F208.3, Location).

### ▪ Short-term

- Install, once re-striping is completed, accessible parking signs at each accessible space, including signs indicating van-accessible parking where van spaces are provided (ABAAS 502.6, Identification).

### ▪ Short-term

- 2) Accessible Route from Parking Lot to the Visitor Center: The sidewalk leading from the accessible space to the main (west) visitor center entrance slopes at 6.25%, exceeding the maximum of 5% for a ramp without handrails, and does not have the required edge protection (Figure 2-3). In addition, the landing at the bottom of the sidewalk exceeds the maximum of 2.08% slope allowed. The following actions are required:

- Demolish and re-pour landing, ensuring that cross-slopes do not exceed 2.08%.

- **Mid-term**

- Add an ABA-compliant handrail to each side of the ramp that extends west from the landing to the visitor center walkway (ABAAS 505, Handrails).

- **Mid-term**

- Add 4" high edge protection on each edge of the ramp. This could be provided in the form of a low rail at 4" off the surface of the ramp that is part of the handrail structure, or by using other methods (ABAAS 405.9.1, Extended Floor or Ground Surface; or 405.9.2, Curb or Barrier).

- **Mid-term**

- 3) Accessible Route from Visitor Center to Memorial Building: A wood deck at the east visitor center door serves as a gathering area for tours of the memorial and ranger talks, but the two 6" steps that lead down from the deck to the sidewalk to the memorial present a barrier to access (ABAAS F206.2.2, Within a Site) (Figure 2-4). In addition, the decking is deteriorating and has settled unevenly since its construction in 2002. This presents numerous safety hazards, particularly for those who use wheelchairs or other assistive devices. The following actions are required:

- Replace the decking to create firm and stable surface on which any change in level is less than ¼" high (ABAAS 303.2, Vertical, and 303.3, Beveled). One option to consider is using a composite-type decking, such as Trex, that can withstand the extremes of weather at the park.

- **Short-term**

- Install at least one ramp from the deck to the sidewalk that leads to the memorial building (ABAAS 303.4, Ramps, and 405, Ramps). Because the porch is symmetrical, the best design would provide two ramps, one at each side.

- **Short-term**

- 4) Exterior Identity Sign: There is no sign on the front side of the visitor center to indicate its use (ABAAS F216, Signs) (Figure 2-5). The following actions are required:

- Install a building identity sign at the main (west) entrance of the visitor center at 48-60" above the exterior paving surface and to the right of the right-hand door. Text should contrast visually with the background, be duplicated in Braille, have raised characters 1/32" above the background, and use uppercase characters with a sans-serif font (ABAAS 703, Signs). Sign should also include hours of operation and other essential visitor information.

**▪ Short-term**

- 5) Exterior Video/Slideshow Display: There is no sign at exterior video/slideshow display informing visitors who are deaf or have hearing loss that the slideshow/video display near the visitor center entrance does not have a narrative audio component (Figure 2-6). Without the sign, visitors who are deaf may think they are missing audible content (Rehabilitation Act of 1973, as amended, Section 504; Programmatic Accessibility Guidelines for NPS Interpretive Media, 2017; Smithsonian Guidelines for Accessible Exhibition Design; NPS Director's Order #42). The following actions are required:

- Install a sign adjacent to the video screen that includes a label or caption indicating that the video/slideshow program contains instrumental music and does not have a narrative audio component.

**▪ Short-term**

- 6) Restrooms: The positioning of grab bars in the accessible toilet compartments and the locations of the toilet paper dispensers do not comply (ABAAS F213.2, Toilet Rooms and Bathing Rooms). Side wall grab bars in accessible stalls are 36" long instead of the required 42" (ABAAS 604.5.1, Side Wall). The rear wall grab bar extends only 11" to one side instead of the required 12" (ABAAS 604.5.2, Rear Wall). Toilet paper dispensers are about 3" above side grab bar top surface, instead of the required 12" minimum above (ABAAS 604.7, Dispensers) (Figure 2-7). The following actions are required:

- Replace 36" side grab bars with 42" grab bars in each accessible compartment. Ensure that each grab bar is installed a maximum of 12" from the rear wall and extends a total of 54" minimum from the rear wall.

**▪ Short-term**

- Reposition the rear grab bars so that they extend from the centerline of the toilet 12" minimum on one side and 24" minimum on the other.

- **Short-term**

- Reposition the toilet paper dispensers so that their outlets are 12" above the top of the side grab bars. Ensure that the centerline of each dispenser is between 7" and 9" in front of the front edge of the toilet.

- **Short-term**

- 7) Drinking fountain: The push-button drinking fountain is difficult to operate with a closed fist (ABAAS 602.3, Operable Parts, and 309.4, Operation). The following actions are required:

- Adjust force required to operate button to <5 pounds of pressure. After adjusting, ensure that flow of water is 4" high, minimum (ABAAS 602.4, Spout Height; 602.5, Spout Location; and 602.6, Water Flow).

- **Short-term**

- 8) Trash and Recycling: The trash and recycling container in front of the visitor center was installed on a concrete pad located 18" from the accessible route, with a strip of grass between it and the accessible route, which can impair access (ABAAS F206.2.2, Within a Site) (Figure 2-8). The following actions are required:

- Extend the pad to meet the accessible route.

- **Short-term**

- 9) Accessible Route Through Auditorium: At the time of the assessment, the seating arrangement allowed an accessible route through the auditorium. The auditorium seats are not in fixed locations, and the park does not have a procedure in place to ensure the accessible route is maintained between film screenings (ABAAS F206, 403.5.1).

- Implement a procedure of checking the auditorium after each film screening and ensure seats are returned to their original positions and/or an accessible route at least 36 inches wide is maintained throughout the auditorium.

- **Short-term**

## **Exhibits**

- 10) Great Lakes Restoration Initiative Videos: There is no assistive listening system available for use with the Great Lakes Restoration Initiative videos. Persons with hearing loss are denied the opportunity to receive the same information as other visitors from these videos (ABAAS F216.10, F219.3, 703.5, 703.7.2.4, 706; Rehabilitation Act of 1973, as amended, Section 504,



Section 508; NPS Audio-Visual Initiative for Visitors with Disabilities; Programmatic Accessibility Guidelines for NPS Interpretive Media, 2017).

- Work with a consultant to determine the type of assistive listening system best suited for use in the visitor center. The system should be compatible with any interpretive exhibits that include an audio component, including videos (currently these are only the four Great Lakes Restoration Initiative videos, see note below). The consultant shall work with the park to determine the number of transmitters needed for the various audio programs in the visitor center (at least one for each audio component) and the number of receivers needed based on visitation numbers. The assistive listening receivers should be made available at the visitor center information desk or fixed to the audio exhibit. The consultant can also determine if the system can be compatible with the existing system in the visitor center auditorium or if a multi-channel system could allow the park to offer audio description through the same devices. Once obtained, purchase and install a sign at the visitor center information desk indicating that the assistive listening system is available. Signs shall include the International Symbol of Access for Hearing Loss. In addition, the availability of the assistive listening system should be marketed through brochures, program announcements, and the park website. Note: An assistive listening system will also be required for any new audio added in the exhibit redesign discussed in a separate work order. Display a sign that includes the International Symbol of Access for Hearing Loss at the visitor center information desk indicating that the portable assistive listening system is available. Include a notice on the park website when the portable assistive listening system is acquired.

▪ **Mid-term**

11) Live Interpretive Programs, Ranger Talks, and Tours: There is no portable assistive listening system available for live interpretive programs, ranger talks, and tours that occur at the visitor center, in the memorial, and on park grounds. People with hearing loss must be provided an equal opportunity to participate in and benefit from the various programs offered for all visitors (ABAAS F216.10, F219, 703.5, 703.7.2.4, 706; Rehabilitation Act of 1973, as amended, Section 504, Section 508; NPS Audio-Visual Accessibility Initiative for Visitors with Disabilities; Programmatic Accessibility Guidelines for NPS Interpretive Media, 2017).

- A portable assistive listening system is required to provide effective communication to visitors with hearing loss. Therefore, the park shall acquire a portable assistive listening system for use in the visitor center, in the memorial, and on park grounds. If only one program or tour occurs at a time, a minimum of one portable multi-channel assistive listening system transmitter and eight portable multi-channel receivers, with at least two being hearing-aid compatible, should be obtained (many

assistive listening systems come in kits containing one transmitter with microphone, eight or more receivers with earbuds, and several neck loops for hearing aid compatibility). The system shall be made available at the visitor center and where groups gather for tours and interpretive programs. Park interpretive staff and volunteers should be trained to offer receivers to visitors upon gathering for tours and other interpretive or special programs. The park should determine if additional transmitters and receivers are necessary based on group sizes and/or if concurrent programs are offered. Display a sign that includes the International Symbol of Access for Hearing Loss at the visitor center information desk indicating that the portable assistive listening system is available. Include a notice on the park website when the portable assistive listening system is acquired.

- **Short-term**

12) Visual Exhibits: Visitor center exhibits, including the Dean Mosher paintings, items in exhibit cases, the diorama, interpretive panels, and maps, and memorial waysides do not have corresponding audio components or audio description. This presents a barrier to full participation for visitors who are blind or have low vision and for some individuals with cognitive impairments (Rehabilitation Act of 1973, as amended, Section 504, Section 508; NPS Audio-Visual Accessibility Initiative for Visitors with Disabilities; Programmatic Accessibility Guidelines for NPS Interpretive Media, 2017; NPS Director's Order #42).

- Work with a consultant to develop and record a script that will incorporate the visual elements of visitor center exhibits and the memorial waysides into an audio-described tour. Include the following elements in the script: a general orientation to the visitor center building, and its relationship to the memorial and grounds; the Dean Mosher paintings; exhibit items on display; interpretive panel images and text; the diorama, videos, the proposed tactile model of the memorial (separate work order), a general orientation to the memorial, the exterior and interior of the memorial, the view from the observation deck, and the waysides on the deck. The consultant should assist in determining what equipment would be most appropriate for the site's specific audio description needs. It may be possible to use the same equipment used for the proposed assistive listening system (separate work order). Ensure that the equipment is hands-free or has a hands-free option (so that visitors can explore their surroundings tactilely), is able to be independently operated, and is hearing-aid compatible. Equipment should be made available at the information desk. Display signage at the information desk indicating that audio description is available and include a notice on the park website when the program is obtained.

- **Long-term**

- *Interim Solution:* Until a comprehensive audio described tour of the park is developed, develop an audio-described tour of the visitor center. Include in the visitor center an audio-described short film or video of the experience of viewing the memorial, riding the elevator, and taking in views from the observation deck. This will benefit both individuals with visual impairments and those unable to physically access the memorial. Train front-line interpretive staff in live audio description, to make the visual images of live tours accessible to individuals with visual impairments.

- **Mid-term**

13) Park Film Audio Description Track: At the time of the assessment, the corresponding audio description track for the park film shown in the auditorium did not match the on-screen visuals (Rehabilitation Act of 1973, as amended, Section 504; NPS Audio-Visual Accessibility Initiative for Visitors with Disabilities; Programmatic Accessibility Guidelines for NPS Interpretive Media, 2017).

- Consult Harper's Ferry Center and/or the contractor who completed the audio description of the park film to repair the audio description. Once the audio description of the park film is repaired, add signage indicating the availability of audio description at the visitor center information desk and at the entrance to the auditorium. Include the availability of both systems on the park website.

- **Short-term**

14) Park Film Assistive Listening: There is no sign indicating the availability of assistive listening or audio description for the park film played in the auditorium (ABAAS F216.10, 703.5, 703.7.2.4, 706; Rehabilitation Act of 1973, as amended, Section 504, Section 508; NPS Audio-Visual Initiative for Visitors with Disabilities; Programmatic Accessibility Guidelines for NPS Interpretive Media, 2017).

- Add signs complying with ABAAS F216.10 at the visitor center information desk and at the auditorium entrance indicating the availability of an assistive listening system.

- **Short-term**

15) Model of Memorial and Grounds: There is no map or model available in a tactile format to communicate the size, scope, and design of the memorial and the surrounding grounds for visitors who are blind, have low vision, or those with cognitive impairments. A model of the memorial at 1"=1' is located inside a case in the visitor center (Rehabilitation Act of 1973, as amended, Section 504; Smithsonian Guidelines for Accessible Exhibition Design;

Programmatic Accessibility Guidelines for NPS Interpretive Media, 2017; ABAAS 306, 308) (Figure 2-9).

- Work with a consultant to design and produce a scaled, three-dimensional model/s of the memorial and grounds to effectively communicate the design of the memorial, its positioning on the landscape, the surrounding topography, and other park features to visitors who are blind, have low vision, and those with cognitive impairments. This may be accomplished through one comprehensive model/map or two separate models, one for the memorial at approximately 1"=2' and one for the grounds and landscape. The tactile model of the grounds should include a "you are here" method of orientation to the location of the visitor in the park (most likely in the visitor center). A variety of textures should be used to distinguish between different features and landscapes. The model/map material should be able to withstand high visitor use, be comfortable to the touch, and be finished with a coating that allows for routine cleaning. Any text used to communicate essential information should incorporate accessible font size and type, should be sans serif or simple serif, and should be large enough to convey the information to the widest range of visitors with and without visual impairments. Any incorporated labels should be accompanied by Contracted (Grade 2) Braille. The model/map should be large enough to depict visual details of the structure that are critical to the interpretive story. The tactile maps should be of an appropriate size for both children and adults, and a tactile scale reference shall be incorporated. Ensure that the model is designed and installed in a manner to comply with accessible reach range, as identified in ABAAS 308. Reach range shall be measured to the farthest tactile model component, measured from the edge of the associated clear floor space. Include the tactile model in the comprehensive audio described tour of the visitor center (separate work order).

- **Long-term**

- Interim Solution: Create a tactile model of the memorial column only and display in the visitor center. Consider a 3D printed model, as they are often easier, less expensive, and quicker to produce than more permanent models.

- **Mid-term**

- 16) Diorama and Reader Rail: The *Battle of Lake Erie* diorama and *The Battle* reader rail are not accessible to individuals who are blind, have low vision, or some individuals with cognitive impairments (Rehabilitation Act of 1973, as amended, Section 504; Programmatic Accessibility Guidelines for NPS Interpretive Media, 2017; Smithsonian Guidelines for Accessible Exhibition Design; NPS Director's Order #42) (Figure 2-10).

- Work with an exhibit designer to create a three-dimensional, tactile model of the Battle of Lake Erie. Consideration should be given to an interactive model showing ship positions over the course of the battle, as displayed visually in the existing reader rail. The overall size of the tactile model shall comply with the allowable reach ranges under ABAAS 308 so that users can touch all areas of the model from one location. Locate the model in an accessible location. Details of the model shall be of an appropriate scale to be discernable by touch. Include the model in the comprehensive audio described tour of the visitor center (proposed in a separate work order).

- **Long-term**

- Interim Solution: Train front-line interpretive staff in live audio description, to make the visual images of live tours accessible to individuals with visual impairments.

- **Short-term**

17) Non-Tactile Exhibits: Exhibit items on display throughout the visitor center are primarily inside cases where they cannot be touched (Figure 2-11 through Figure 2-13). Other visual interpretation is provided through interpretive panels containing graphics and text (Figure 2-14). These do not offer any tactile or interactive experiences to advance the understanding of the interpretive story for visitors who are blind or have low vision and for those with cognitive impairments (Rehabilitation Act of 1973, as amended, Section 504; Programmatic Accessibility Guidelines for NPS Interpretive Media, 2017; Smithsonian Guidelines for Accessible Exhibition Design; NPS Director's Order #42).

- Consult with an exhibit designer to determine and produce relevant tactile elements for display in the visitor center. Tactile opportunities using artifacts, reproductions, or models should be provided wherever possible as they are essential to people with visual impairments and greatly assist many people with cognitive disabilities. The objects and models should be essential to the exhibit's main themes and provide an equal opportunity to understand what is displayed visually. Touchable models or reproductions of exhibit items already on display such as the *Lawrence* model, weapons and ammunition, the USS Lake Erie model, and the Oliver Hazard Perry statue should be considered, as well as additional elements unfamiliar to visitors such as a dollhouse-style model of the decks of the *Lawrence* and *Niagara*, rigging on the *Lawrence* and *Niagara*, the *Lawrence* and/or *Niagara* after the battle (could be paired with a model of the ship/s before the battle), and outlines of various ships. Include these tactile exhibits in the audio described tour recommended in a separate work order.

- **Long-term**

- Interim Solution: Display reproductions and other non-historic items currently in park possession, such as the reproduction musket and pike, in an accessible location that allows for tactile exploration.

- **Short-term**

18) Maps: The visitor center exhibits contain several regional maps showing military campaigns and battles during the War of 1812 (Figure 2-15). These maps and the military strategy illustrated on them are not available to individuals who are blind or have low vision (Rehabilitation Act of 1973, as amended, Section 504; Programmatic Accessibility Guidelines for NPS Interpretive Media, 2017; Smithsonian Guidelines for Accessible Exhibition Design; NPS Director's Order #42).

- Solution: Work with a consultant to design and produce tactile maps to effectively communicate military campaigns and strategies of the War of 1812 to visitors who are blind, have low vision, and those with cognitive impairments. A variety of textures should be used to distinguish between different features and land masses. The map material should be able to withstand high visitor use, be comfortable to the touch, and be finished with a coating that allows for routine cleaning. Any text used to communicate essential information should incorporate accessible font size and type, should be sans serif or simple serif, and should be large enough to convey the information to the widest range of visitors with and without visual impairments. Any incorporated labels should be accompanied by Contracted (Grade 2) Braille. The tactile maps should be of an appropriate size for both children and adults, and a tactile scale reference shall be incorporated. Ensure that the maps are designed and installed in a manner to comply with accessible reach range, as identified in ABAAS 308. Reach range shall be measured to the furthest tactile map component, measured from the edge of the associated clear floor space. Include the tactile map in the comprehensive audio described tour of the visitor center (separate work order).

- **Long-term**

19) Low-Contrast Exhibit Text: A few of the interpretive exhibit panels in the visitor center present barriers for visitors with low vision due to limited color contrast between text and background (captions on *War of 1812, How Well Did the Strategy Work?*) and minimum font sizes (Figure 2-16). The minimum font size found on interpretive panels was 24 point; while this meets the minimum font size outlined in the *Programmatic Accessibility Guidelines for NPS Interpretive Media*, visitors with low vision would have to be very close to a 24 point exhibit label to read the information (Rehabilitation Act of 1973, as amended, Section 504; Programmatic Accessibility Guidelines for NPS Interpretive Media, 2017; Smithsonian Guidelines for Accessible Exhibition Design; NPS Director's Order #42).

- Work with an exhibit designer to create an exhibit design plan and replacement schedule for the panels and exhibits in the visitor center. As exhibits are replaced, ensure that the information is presented in a way that is accessible to the widest range of visitors. Things to consider in interpretive design include the use of sans serif or simple serif fonts (as opposed to serif fonts), minimal use of italics, the size of font in relation to reading distance (if space allows, a minimum 36 point font should be used, otherwise a minimum 24 point font can be used for nonessential text such as photo captions and labels, and a minimum 36 point font can be used for primary text), contrast between text and background of 70-95 percent, and the incorporation of audio and tactile elements (as discussed in separate work orders). Include the most pertinent information contained on the interpretive panels into the proposed audio described tour of the visitor center (contained in a separate work order). Consult the Programmatic Accessibility Guidelines for NPS Interpretive Media and the Smithsonian Guidelines for Accessible Exhibition Design for additional information on accessible exhibitions, including viewing heights, exhibit cases, labeling, and reach ranges for interactive components.

#### ▪ Long-term

20) Don't Give Up the Ship: The *Don't Give Up the Ship* display case containing a model of the *Lawrence* exceeds height recommendations for maximum visibility by visitors who are seated, of short stature, and/or children (see Figure 2-12). The base of the case is at 35 inches above the finish floor, and the ship's deck is at 46 inches above the finish floor. The wooden trim outside the case is at 31 inches above the finish floor (Rehabilitation Act of 1973, as amended, Section 504; Programmatic Accessibility Guidelines for NPS Interpretive Media, 2017; Smithsonian Guidelines for Accessible Exhibition Design; NPS Director's Order #42).

- Modify the exhibit case and ship stand to lower the ship's deck to a maximum of 40 inches above the finish floor to allow all visitors to view the deck.

#### ▪ Mid-term

21) Reproduction Long Gun: The reproduction long gun aiming through the "ship wall" from the exhibit space to the park store is not accessible for individuals who are blind, have low vision, and for some individuals with cognitive impairments (see Figure 2-13). There is no accessible route to the long gun (ABAAS 305, 402; Rehabilitation Act of 1973, as amended, Section 504; Programmatic Accessibility Guidelines for NPS Interpretive Media, 2017; Smithsonian Guidelines for Accessible Exhibition Design; NPS Director's Order #42).

- Create an additional reproduction long gun to display in an accessible location or modify the wooden platform to create an accessible route to the display that allows



all visitors to tactilely explore the long gun. Consider removing the platform and relocating the adjacent artifact case.

- **Mid-term**

22) Peace Wall Exhibit: The pages in the photo flipbook in the *Peace Wall* exhibit may not easily be turned by someone with limited manual dexterity (ABAAS F205, 309.4; Rehabilitation Act of 1973, as amended, Section 504; Programmatic Accessibility Guidelines for NPS Interpretive Media, 2017) (Figure 2-17).

- Add a sturdy backing and a sturdy tab to each page of the flip book to allow individuals with limited manual dexterity to turn the pages. Consider organizing the photos by category, digitizing, and displaying via an interactive touchscreen.

- **Short-term**

23) Flipbooks: Small font sizes of text and captions in the two flip books near the benches in the center of the visitor center may prevent individuals with low vision from reading the text (Figure 2-18). The pages in the two flip books may not easily be turned by someone with limited manual dexterity (ABAAS F205, 309.4; Rehabilitation Act of 1973, as amended, Section 504; Programmatic Accessibility Guidelines for NPS Interpretive Media, 2017).

- If space allows increase the size of text and photo captions to a minimum 36-point font, otherwise increase to a minimum 24-point font. Add a sturdy tab to each of the pages of the flip book to allow individuals with limited manual dexterity to turn the pages.

- **Short-term**

24) 1912-1915 Reader Rail: The bottom edge of the 1912-1915 reader rail facing the memorial protrudes into the circulation path and is not cane-detectable with a bottom leading edge at 28 ¼ inch above the finish floor (ABAAS F204, 307.4) (Figure 2-19).

- Add a board or other extension to the bottom underside of the reader rail that extends down to 27 inches above the finish floor.

- **Short-term**

## **Bookstore**

25) Wall-Mounted Shirt Racks: The wall-mounted metal shirt racks protrude into circulation paths of the bookstore and may present a hazard for individuals with visual impairments (ABAAS F204.1, 307.2) (Figure 2-20).

- Ensure the racks are filled with merchandise. When filled, the merchandise should provide cane detection below the protruding racks.

- **Short-term**

26) Merchandise Displays: Merchandise displays reduce the clear width of the accessible route through the bookstore to 30 inches in some locations (ABAAS F206, 403.5.1) (Figure 2-21).

- Rearrange merchandise displays in the bookstore to maintain a 36-inch-wide accessible route through the store.

- **Short-term**

27) Merchandise Reach Range: Some merchandise in the bookstore is located outside of maximum reach range allowances, limiting some individuals from reaching the merchandise (ABAAS F205, 308.2, 308.3, 309.3; Rehabilitation Act of 1973, Section 504, as amended) (see Figure 2-20).

- Relocate the most popular merchandise so that it is located between 15 and 48 inches above the finish floor. Train store staff to politely and sensitively provide assistance acquiring items located out of reach to customers with disabilities.

- **Short-term**

28) Lower Service Counter: The lower service counter does not meet minimum length requirements for a parallel approach at 24 ½ inches (Figure 2-22). The lower service counter is at the rear of the visitor information desk, not viewable from the visitor center entrance, and does not provide a welcoming atmosphere for visitors with disabilities (ABAAS F227.3, 904.4; Rehabilitation Act of 1973, Section 504, as amended).

- Extend accessible service counter so that it is a minimum of 36 inches long.

- **Short-term**

- Replace front service counter with an accessible service counter complying with ABAAS 904.4 including having a maximum height of 36 inches above the finish floor or renovate service counter to include an accessible service counter complying with ABAAS 904.4. Whether replacing or renovating, the new accessible counter should be visible from the visitor center entrance to be welcoming of all visitors.

- **Mid-term**

- Interim Solution: Train staff working at the information desk to offer assistance to visitors and customers who cannot use the existing service counters.

- **Short-term**

29) Print Publications: The printed National Park Service publications, including the Unigrid brochure, interpretive handouts, and program schedules are not provided in alternate formats (Rehabilitation Act of 1973, as amended, Section 504, Section 508; Programmatic Accessibility Guidelines for NPS Interpretive Media (2017); NPS Director's Order #42).

- Provide publications that are considered "readily available," such as the official park brochure and program schedule, in alternate formats, including Contracted (Grade 2) Braille, large print, audio, and electronic versions. Make these available for visitors to take with them, as with the Unigrid brochure. Publications provided in electronic format shall be included on the park's accessibility portion of the website. Develop a procedure for translating content of brochures and publications into alternate formats; insert a statement in those publications indicating "alternate formats of this publication are available upon request." *Note*: Cooperative associations are a frequent source of funding for alternate format publications.

- **Mid-term**



Figure 2-3. Sidewalk leading west from the landing slopes at 6.25%, exceeding the maximum of 5% for a ramp without handrails, and does not have the required edge protection. Commonwealth.



Figure 2-5. There is no sign on the front side of the visitor center to indicate its use. Commonwealth.



Figure 2-4. Wood deck at the east visitor center door. The two 6" steps that lead down from the deck to the sidewalk to the memorial present a barrier to access. Commonwealth.



Figure 2-6. There is no sign at exterior video/slideshow display informing visitors who are deaf or have hearing loss that it does not have a narrative audio component. Commonwealth.





Figure 2-7. Typical toilet paper dispenser placement. Commonwealth



Figure 2-9. Model of the memorial located inside a case in the visitor center. National Center on Accessibility.



Figure 2-8. Trash/recycling container. Commonwealth.



Figure 2-10. *Battle of Lake Erie* diorama and its reader rail. National Center on Accessibility.





Figure 2-11. Model of ship in a glass case. National Center on Accessibility.



Figure 2-13. Exhibit of long gun and other battle-related artifacts. National Center on Accessibility.



Figure 2-12. Model of ship enclosed in a glass case. National Center on Accessibility.

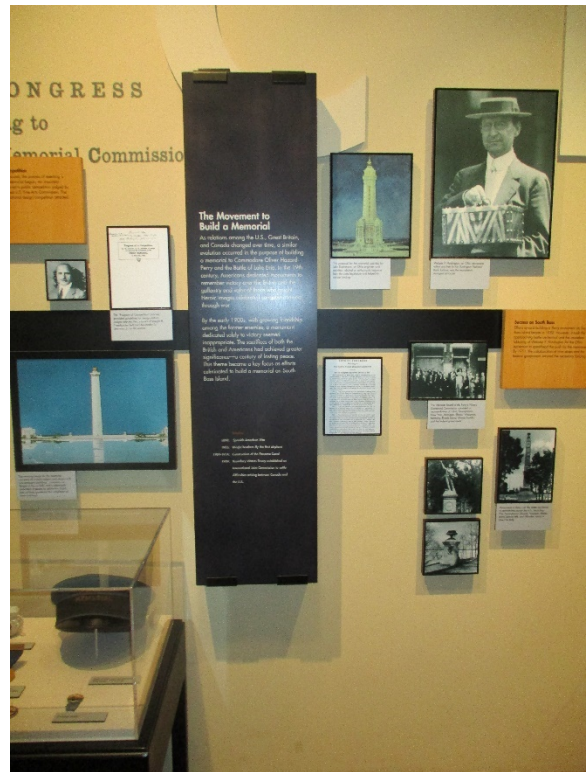


Figure 2-14. Other visual interpretation provided through interpretive panels with graphics and text does not offer tactile or interactive experiences to advance the understanding for visitors who are blind or have low vision and for those with cognitive impairments. National Center on Accessibility.



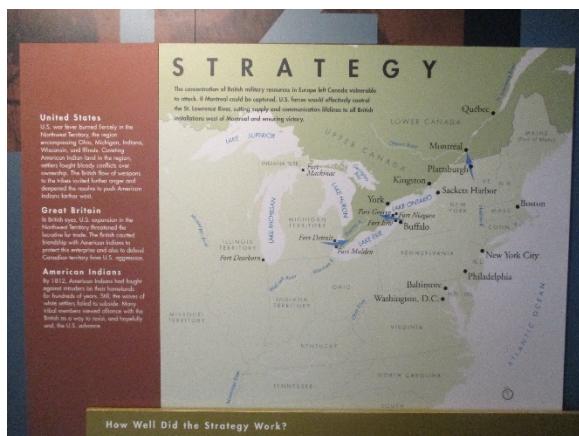


Figure 2-15. Regional map showing military campaigns and battles during the War of 1812. National Center on Accessibility.



Figure 2-18. Flip books near benches in visitor center may be difficult for some to use. National Center on Accessibility.

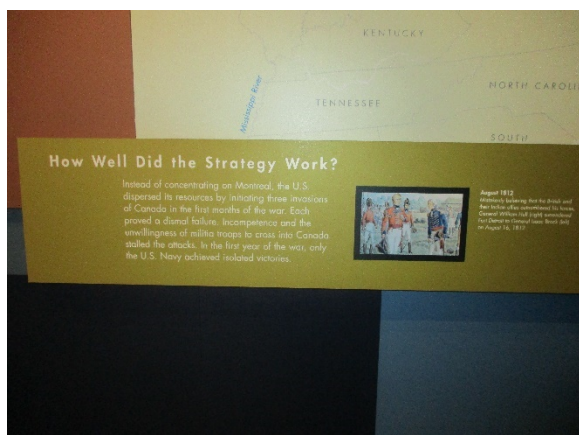


Figure 2-16. Exhibit panels that present barriers for visitors with low vision due to limited color contrast between text and background and minimum font sizes. National Center on Accessibility.



Figure 2-19. 1912-1915 reader rail. National Center on Accessibility.



Figure 2-17. *Peace Wall* flip book exhibit may be difficult to use. National Center on Accessibility.



Figure 2-20. Wall-mounted metal shirt racks protrude into circulation paths of the bookstore. National Center on Accessibility.



Figure 2-21. Merchandise displays reduce the clear width of the accessible route through the bookstore to 30 inches in some locations. National Center on Accessibility.



Figure 2-22. The lower service counter does not meet minimum length requirements for a parallel approach at 48 inches. National Center on Accessibility.



# Memorial Building

## Site Plan

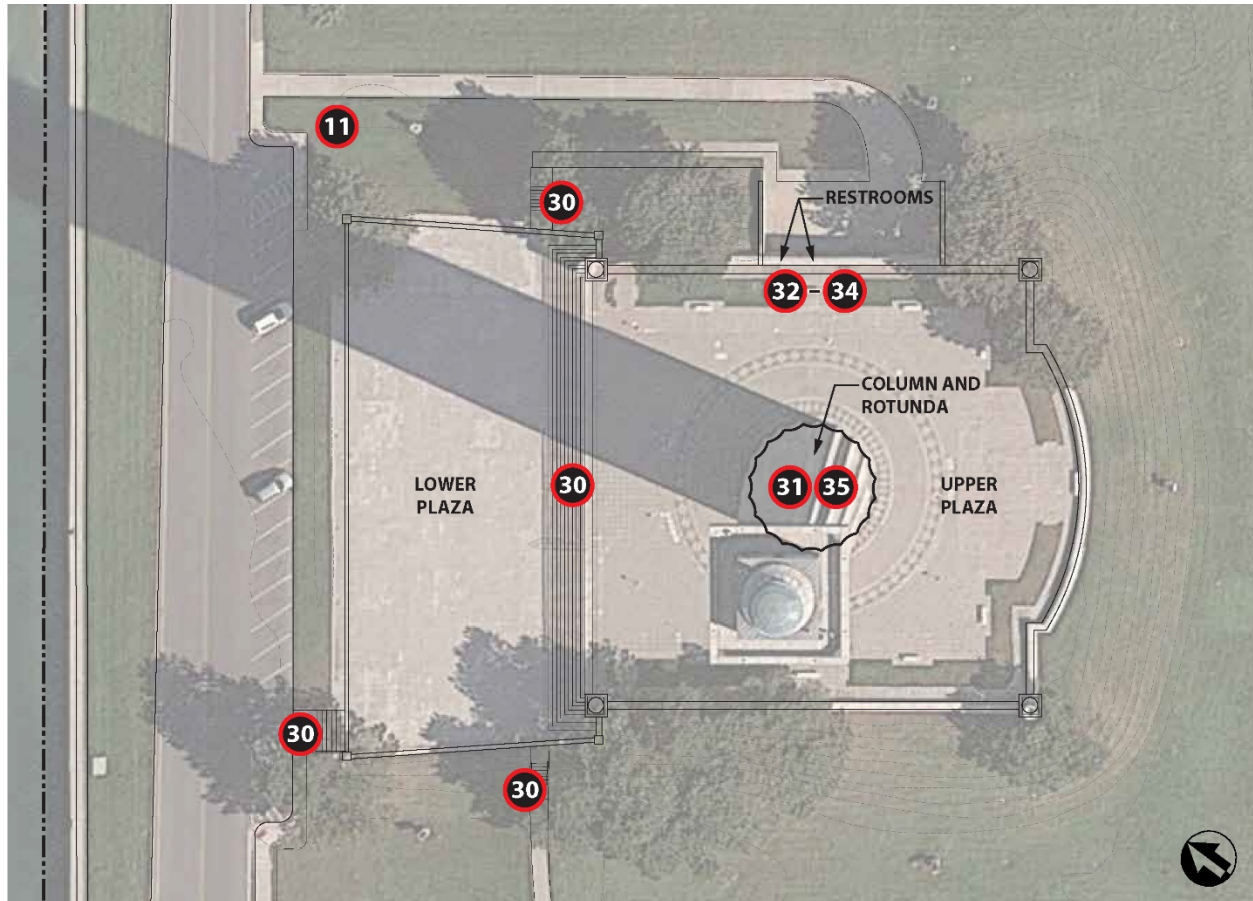


Figure 2-23. Memorial Building site plan.

## Floor Plan

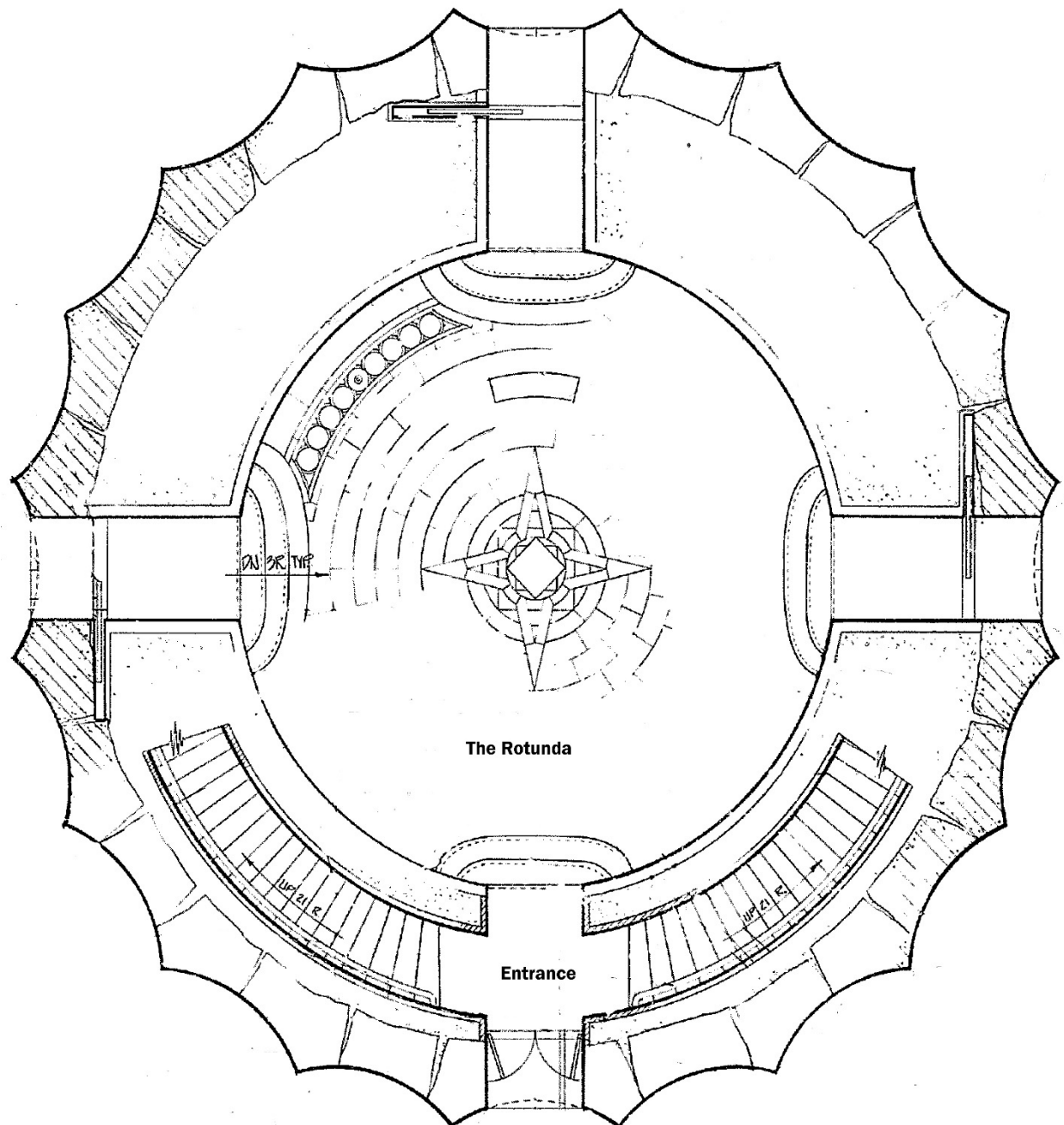


Figure 2-24. Memorial column floor plan, entry level.

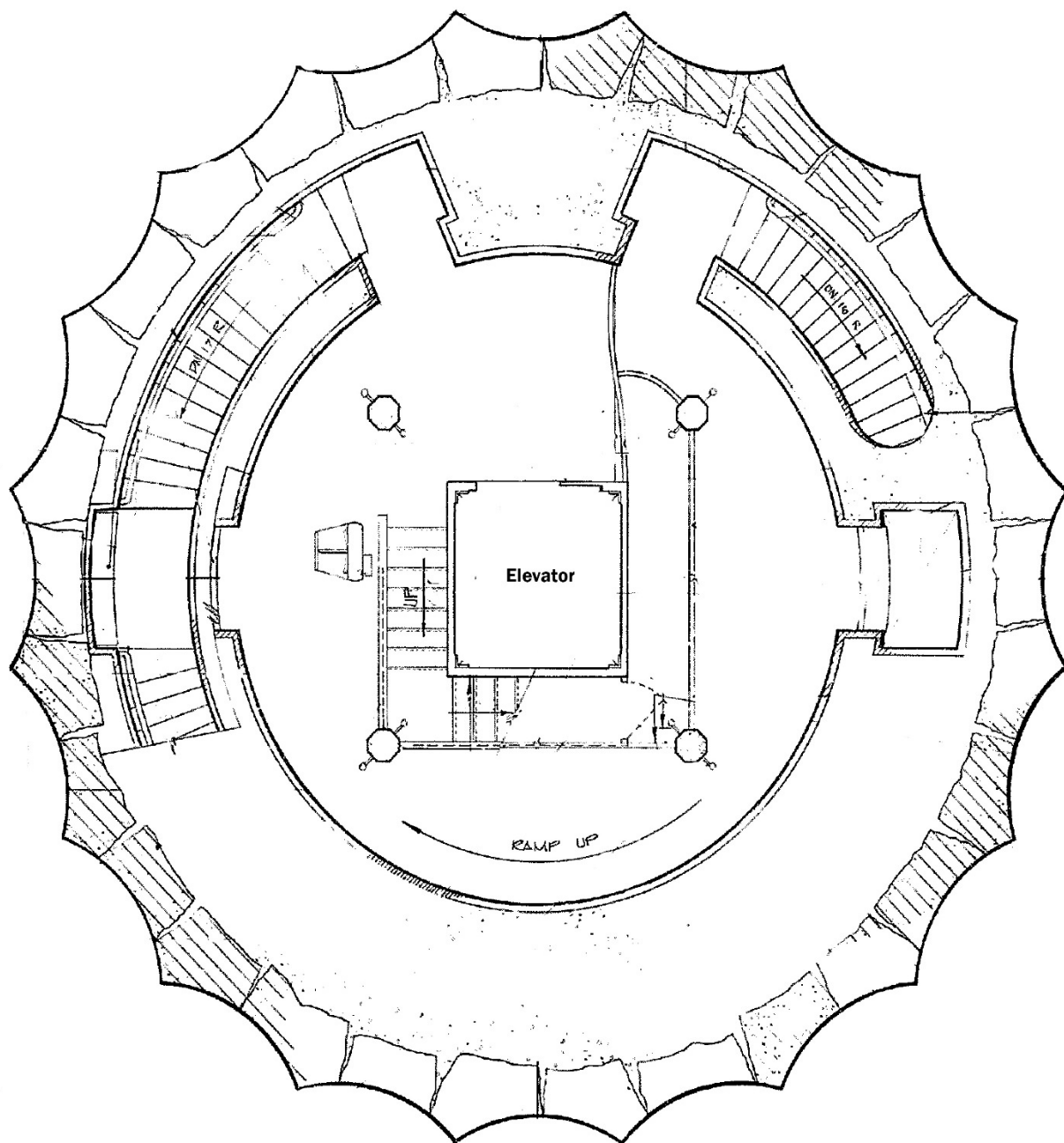


Figure 2-25. Memorial column floor plan, elevator level.

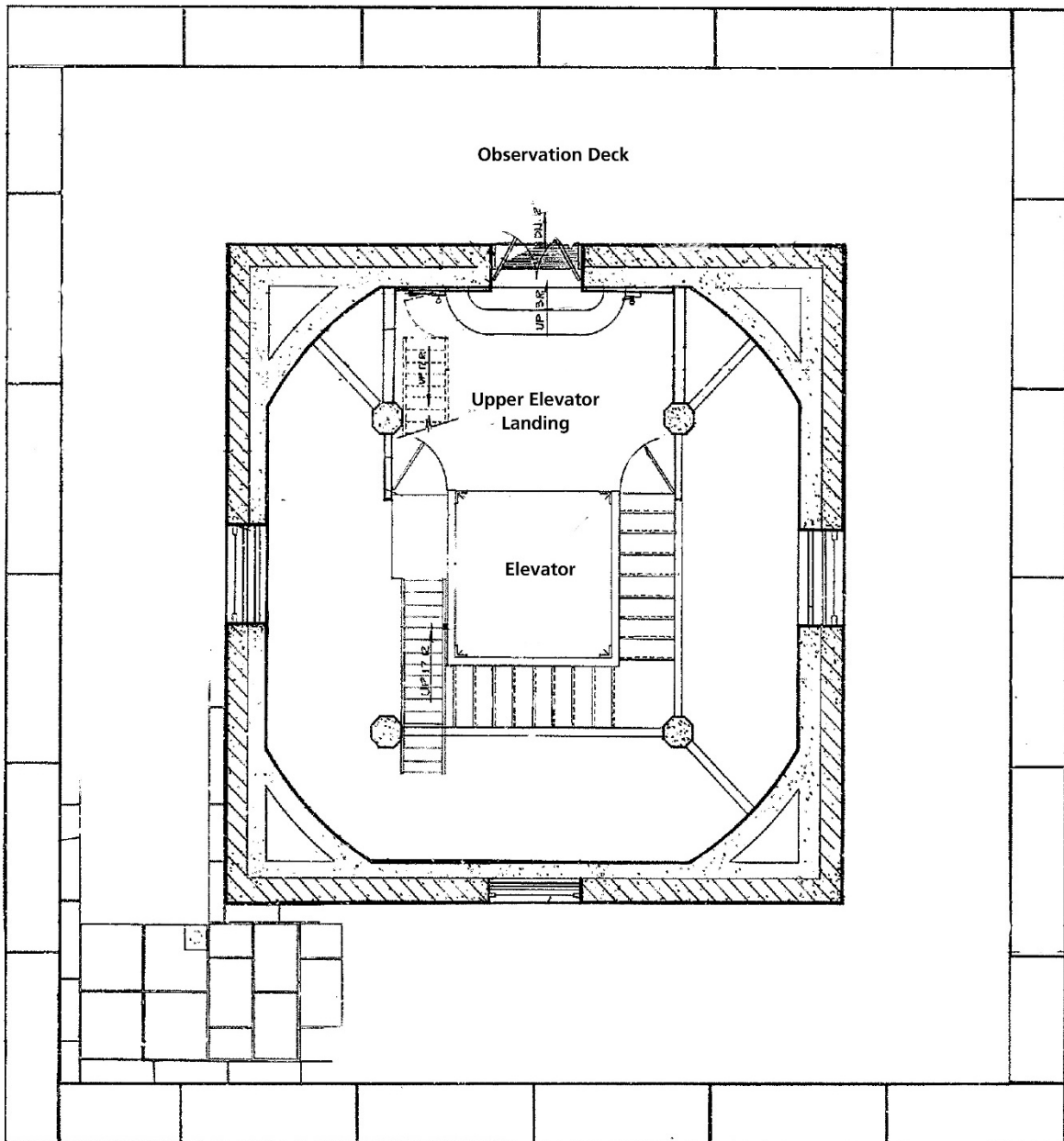


Figure 2-26. Memorial column floor plan, observation deck level.

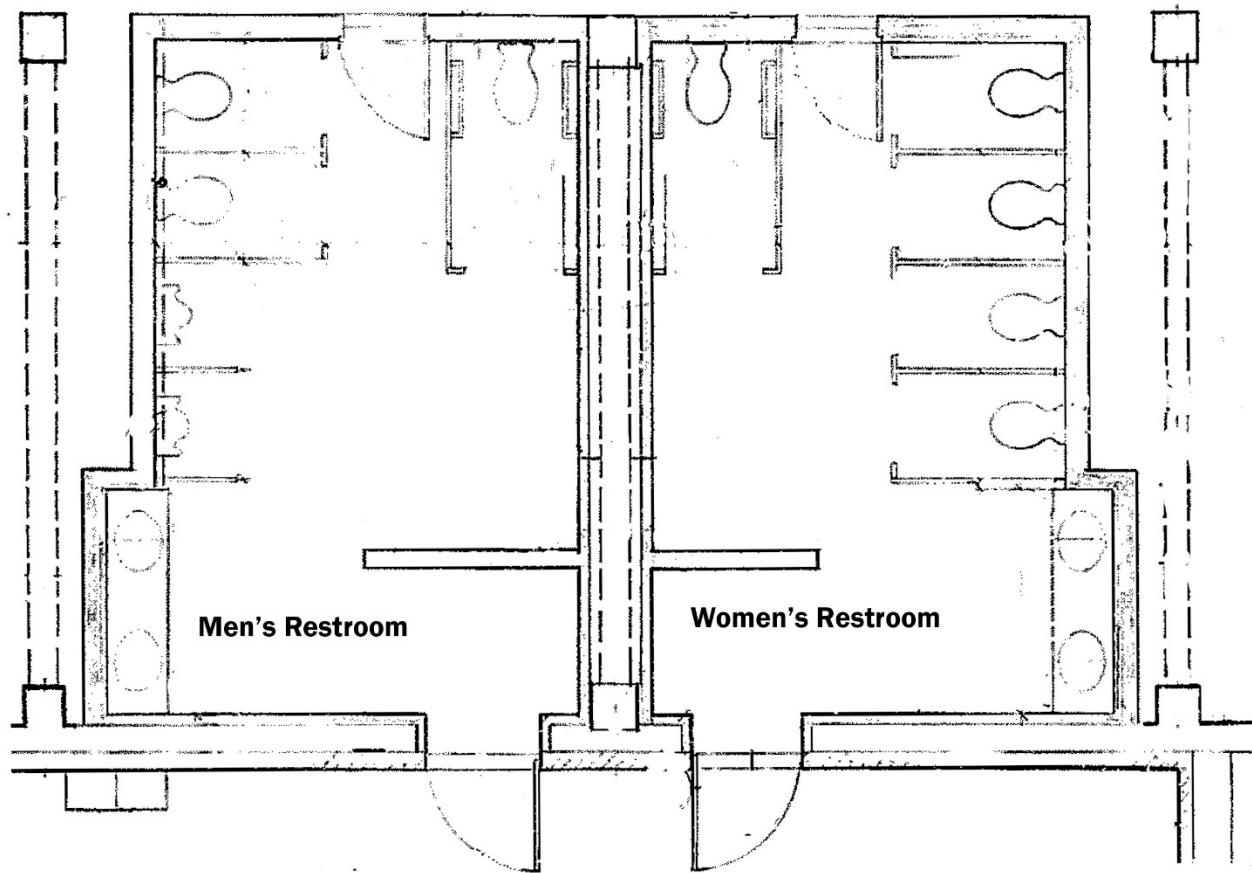


Figure 2-27. Memorial building restrooms floor plan.

## Implementation Strategy

The memorial building, with its iconic column, and upper and lower plazas, and observation deck, is the most popular attraction at the park and receives high levels of visitation. Three key park experiences are provided at the memorial building: the 360° view of Put-In-Bay, Lake Erie, the site of the battle, and the shores of Canada available from the column's observation platform; the reverence and sanctity of the rotunda and crypt; and the views Lake Erie and Put-In-Bay from the upper plaza. Related to these experiences are the opportunities to learn about the Battle of Lake Erie through interpretive waysides on the observation deck. In addition, visitors also gather on the upper plaza and its steps to enjoy performances held on the lower plaza during the summer.

Visitor programs and activities provided at this area for visitors include guided tours, educational programs, and special events. Visitors can also gather informally on the upper plaza on the benches provided there. On Independence Day, visitors gather on the plazas, the adjacent lawn, and the north seawall to view fireworks, which are usually shot from a barge in Put-in-Bay in front of the memorial building. On the rare occasion when weather dictates

otherwise, the fireworks are shot from a barge on the Lake Erie side of the memorial, and people sometimes site on the north seawall.

The existing services that support these activities and programs include car parking spaces (primarily used by golf carts), wayfinding and orientation signs, interpretive waysides, benches, trash and recycling receptacles, drinking fountains (temporarily removed at time of site visit), and restrooms. The accessible route leads from the park's visitor center to the restrooms housed in the basement of the memorial building. There are currently 18 car parking stalls, including two accessible spaces: one is van accessible, with an eight-foot-wide access aisle connecting to the park's accessible route, and the other is car-accessible, with a five-foot-wide access aisle.

Visitors enter the memorial building by ascending five steps from the ground level on the north side to the lower plaza or seven steps on the west side, step over the lower plaza's 2" high raised curb, then 13 more steps to reach the upper plaza. From the upper plaza, broad views are available towards both Put-In-Bay and Lake Erie. The visitor then enters the column and descends three steps into the rotunda. Six officers from the Battle of Lake Erie are interred in a crypt located below the rotunda floor. After climbing back up the three steps to the entrance foyer, visitors turn left to ascend a flight of 37 narrow and steep steps to the elevator platform. The elevator delivers the visitors to the uppermost floor, from which they ascend another three steps to the viewing platform. From the platform, visitors can see across Lake Erie to the battle site and, on a clear day, Canadian shores.

There is no wheelchair access to the memorial building's upper and lower plazas, into the column's rotunda, to the elevator, or to the observation deck because of the number of stairs. However, the view afforded to the visitor from the observation deck is one of the key experiences offered at the park. In the past, the park has provided a device in the visitor center that allowed visitors to remotely experience static live images of the view towards the site of the battle. The device was removed when work was done on the observation deck and has not been reinstalled.

The following improvements to accessibility at this park area are recommended:

## **Facilities**

30) Accessible Route to the Upper and Lower Plazas: This structure was completed in 1924 before the passage of the Architectural Barrier Act of 1968. Currently, there is no accessible route to the building's upper and lower plazas.

- The park is currently planning the addition of ABA-compliant ramps that will provide a connection between the park's accessible route and the upper and lower plazas (ABAAS

F206.2.2, Within a Site). The project will also include replacing the gravel walking surface of the upper plaza with a hard material that is stable, firm, and slip-resistant.

- **Long-term**

31) Accessible Route to Observation Deck (Figures 2-24 through 2-26): There is no accessible route to the observation deck of the memorial building, which prevents access to the 360-degree views of the battle site and other features. While there is an elevator to the observation deck, the elevator platform is at the top of a steep, narrow, 30-riser stairway. There are no plans underway to provide ABA-compliant access to the elevator and viewing platform for people who rely on wheelchairs or have other mobility challenges. The following actions can enhance access:

- Provide a way for visitors to participate in activities on the observation deck remotely through the use of a self-controlled camera or other visual or descriptive device.

- **Long-term**

32) Restrooms (Figure 2-27): Restrooms for men and women are in the basement of the memorial building and are accessed from exterior doors; neither is accessible (ABAAS F213.2, Toilet Rooms and Bathing Rooms). Thresholds into both men's and women's restrooms are 1-1/2" high instead of the required 3/4" (ABAAS 402.2, Components) (Figure 2-28). There is no wheelchair-accessible stall in either restroom, which required clearance around a toilet of 60" minimum measured from the side wall, and 56" minimum measured from the rear wall (ABAAS 604.8.1, Wheelchair Accessible Compartments). Rim of sink in each restroom is 1" higher than the 34" maximum height for ABA compliance (ABAAS 606.3, Height) (Figure 2-29). Reflecting surface of mirrors is 41" instead of the maximum 40" above the floor surface (ABAAS F213.3.5 and 603.3, Mirrors). The sign on the outside of each restroom door is centered, which does not comply with ABA standards (ABAAS 703.4, Installation Height and Location) (Figure 2-30). The following actions are required:

- Add a threshold ramp at each door for maximum 3/4" high threshold. Block basement access door in each restroom to provide enough room for a wheelchair-accessible stall, which should be 60" wide, minimum, and 56" deep, minimum, for a wall-hung toilet. Ensure that the other features, such as grab bars and dispensers, and their locations comply with ABA standards (ABAAS 603, Toilet and Bathing Rooms, and 604, Water Closets and Toilet Compartments). Install under-mounted sinks so that rims are no more than 34" above the floor. Move the mirror above the sinks down 1" so that the bottom of the reflecting surface is 40" or less above the floor. Relocate restroom door signs so that they are on the latch side of the door.

- **Long-term**

- *Interim Solution:* Until the changes below can be made, provide an accessible portable toilet near the memorial building restrooms and provide signs directing people to the accessible restroom.

- **Short-term**

33) Accessible Route to Restrooms: The restrooms provided at the memorial building are not accessible. Once they have been modified to become accessible, the following actions are required:

- Install a sign visible from the accessible parking that directs visitors to the accessible restrooms. This could be attached to the accessible parking sign (ABAAS F206.2.4, Spaces and Elements; 603, Toilet and Bathing Facilities; and 703, Signs).

- **Short-term**

- Add wheelchair symbols below the restroom door signs (ABAAS 703.7, Symbols of Accessibility).

- **Short-term**

34) Drinking Fountain: Drinking fountain could not be observed because it had been removed for the duration of the memorial column re-pointing project. When drinking fountains are replaced, the following actions are required:

- Ensure that their placement and operation comply with ABAAS requirements (ABAAS 602.2, Clear Floor Space; 602.3, Operable Parts; 502.4, Spout Height; 602.5, Spout Location; 602.6, Water Flow; 602.7, Drinking Fountains for Standing Persons; and 306.3, Knee Clearance).

- **Short-term**

## **Exhibits**

35) Wayside Maps on Observation Deck: The wayside maps on the memorial observation deck show ship positions during the Battle of Lake Erie and identify the locations of nearby islands visible from the observation deck (Figure 2-31). The information contained in these maps is not available to individuals who are blind or have low vision (Rehabilitation Act of 1973, as amended, Section 504; Programmatic Accessibility Guidelines for NPS Interpretive



Media, 2017; Smithsonian Guidelines for Accessible Exhibition Design; NPS Director's Order #420).

- Work with a consultant to design and produce tactile maps to effectively communicate ship positions during the Battle of Lake Erie and identify islands visible from the observation deck to visitors who are blind or have low vision, and those with cognitive impairments. A variety of textures should be used to distinguish between different features and land masses. The map material should be able to withstand high visitor use, be comfortable to the touch, and be finished with a coating that allows for routine cleaning. Any text used to communicate essential information should incorporate accessible font size and type, should be sans serif or simple serif, and should be large enough to convey the information to the widest range of visitors with and without visual impairments. Any incorporated labels should be accompanied by Contracted (Grade 2) Braille. The tactile maps should be of an appropriate size for both children and adults, and a tactile scale reference shall be incorporated. Ensure that the maps are designed and installed in a manner to comply with accessible reach range, as identified in ABAAS 308. Reach range shall be measured to the furthest tactile map component, measured from the edge of the associated clear floor space. Include the tactile maps in the comprehensive audio described tour of the park (separate work order).

- **Long-term**



Figure 2-24. Door to women's restroom at Memorial building. Commonwealth.



Figure 2-26. Close-up of sign on door to women's restroom at Memorial building. Commonwealth.



Figure 2-25. Typical sink installation in restrooms in Memorial building. Commonwealth.



Figure 2-31. Interpretive wayside on Memorial column observation deck. Commonwealth.

## Historic Landscape

### Implementation Strategy

The historic landscape is contained within the current boundaries of the Perry's Victory and International Peace Memorial National Historic District, which extends from the centerline of the visitor center parking lot driveway on the east side to approximately the base of the hill that supports park housing. It contains the historic landscape features that were part of the original memorial park, including the memorial building and its plazas, sidewalks, seawalls, and historic trees and lawn. The landscape is relatively flat and open.

The following improvements to accessibility are recommended:

36) Accessible Route—Sidewalk from Visitor Center to Memorial Building: One section of this concrete sidewalk exceeds the maximum 5% slope for a ramp without a handrail (ABAAS 402.2, Components). This section crosses the drainage swale that marks the east side of the trace of Chapman Avenue (Figure 2-32).

- Demolish and replace this portion of the sidewalk to be less than 5% slope.

- **Short-term**

37) Accessible Route—Bayview Avenue Sidewalk: Some sections of this sidewalk have subsided, creating cross-slopes over 2% (ABAAS 402.2, Components). In addition, there are some expansion joints that are wider than the maximum ½" limit for accessibility (ABAAS 302.3, Openings).

- Remove and repour sections of sidewalk that exceed 2% cross-slope.

- **Short- to Mid-term**

- Refill these joints with the appropriate filler to less than ½" width.

- **Short- to Mid-term**

38) Accessible Route—Interior Park Sidewalks: Some interior sidewalks are cracked, or are missing expansion joints, which leave gaps that are wider than the maximum ½" limit for accessibility (ABAAS 302.3, Openings, and 303.2, Vertical).

- Repair sidewalk cracks and refill joints.

- **Short-term**



Figure 2-32. Location of dip in sidewalk where slope exceeds the maximum allowable without a handrail. Commonwealth.

# Chapter 3: Policies, Practices, Communication, and Training Implementation Strategy

## Key Findings and Recommendations for Modification of Policies, Practices, and Procedures

Park policies, procedures and practices are specific to each park unit. A policy is a defined set of rules or regulations. Procedures are the steps needed to fulfill the policy. Practices are how the procedures are actually followed in the daily operation.

### Public Notice

The regulations require the agency to make available to employees, applicants, participants, beneficiaries, and other interested persons information regarding the law and its applicability to the programs or activities conducted by the agency.

**Recommendation:** Display the NPS [Disability Rights poster](#) prominently in both the visitor center and on bulletin boards in the field to inform the public that discrimination on the basis of disability is prohibited and of the process to file a disability-related complaint. In addition, include non-discrimination language in all forms of information shared with the public.

- **Short-term**

### Program Accessibility: Existing Facilities

Facilities serve as the space to support programs and activities. Section 504 does not require the agency to make each of its existing facilities or every part of a facility accessible. Instead, the agency is required to operate each program or activity so that the program or activity, when viewed in its entirety, is readily accessible to and usable by people with disabilities. The regulations enable the agency to:

- 1) modify policies and procedures to eliminate inadvertent discrimination
- 2) move programs and activities to accessible locations
- 3) remove physical barriers to provide program access, and/or
- 4) provide a program alternative.



**Recommendation:** Accessibility improvements to the upper and lower plazas of the memorial building are being considered in the cultural landscape treatment plan, which is an ongoing project. Since there is no accessible route to the rotunda or to the column's observation deck, a program alternative must be provided.

A program alternative should be created through a combination of methods, including an audio described tour of the memorial building, a model of the memorial building, the duplication of the waysides located on the observation deck in an accessible location (such as on the plaza below the memorial column), a live camera feed of the view (displayed on the plaza, in the visitor center, and/or online), and synced tablets that allow individuals who cannot physically access the memorial building to digitally access it in real-time with their companions.

- **Long -term**

## Planning

A comprehensive approach to planning will help to balance the corrective actions needed for accessibility and the different types of other projects in the park.

**Recommendation:** Establish a more formal Accessibility Team that is representative of the various park divisions (facility operations, interpretation, cultural resources, etc.). Utilize the Accessibility Team to prioritize corrective actions and schedule accessibility improvements with comprehensive planning considerations in alignment with the long-range planning priorities. Develop a procedure for formal project and plan reviews, and to provide comment on accessibility improvements. Develop a process to inspect and approve construction projects prior to acceptance from contractors to ensure the construction complies with the accessibility standards.

- **Mid-term**

## Maintenance

The regulations require agencies to maintain accessibility features in working conditions that are readily accessible and usable by people with disabilities.

**Recommendation:** Park personnel should be trained to give special consideration to the maintenance of accessible routes, equipment, and furnishings, and a standard operating procedure developed. Include snow removal in the standard operating procedures for maintaining accessible routes when appropriate during the winter months.

- **Short-term**

## Program Accessibility: New Construction and Alterations

Section 504 requires each building or part of a building that is constructed or altered by, on behalf of, or for the use of the agency be designed, constructed, or altered, to be readily accessible to and usable by people with disabilities (Section 504, DOI Part 17, Subpart E 17.551 Program accessibility: New construction and alterations).

**Recommendation:** The maintenance supervisor and other members of the Accessibility Team should understand the application of ABAAS and therefore should receive training in the application of ABAAS to construction. In addition to reviewing plans (including accessibility), this person or a similar person, should insure that the on-site inspector is well versed in ABAAS for construction. The on-site inspector should ensure proper application of the accessibility standards during construction and sign off on the construction prior to final acceptance.

- **Mid-term**

## Park Regulations

Park policies and restrictions under the authority of the park superintendent are described in detail in the Perry's Victory and International Peace Memorial Compendium (2014).

## Other Power-Driven Mobility Devices

An OPDMD is any mobility device powered by batteries, fuel, or other engines that is used by individuals with mobility disabilities for locomotion, whether or not it was designed primarily for use by individuals with mobility disabilities.

**Recommendation:** Develop a policy on the use of OPDMDs under the requirement for modification of policies. The use of a golf cart as an OPDMD should be considered as a modification to policy for people with disabilities who may use a golf cart for mobility due to their disability. This can be accomplished through a special permit. If the golf cart would not be allowed as modification to policy, then a rationale must be provided.

## Service Animals

Park staff indicated there is often confusion by staff and volunteers about whether a person with a dog entering the visitor center or memorial building has a service animal or if it is a pet.

**Recommendation:** The Park should develop a policy on service animals and train staff and volunteers on that policy. The training should include the definition of a service animal as a dog trained to perform a task(s) for the benefit of a person with a disability.

Also include the questions that may and may not be asked to determine the status of a service animal.

- **Short-term**

**Recommendation:** An update to the superintendent's compendium is planned for 2018 which should specify the use of service animals within the park for staff, volunteers and visitors.

- **Short-term**

**Recommendation:** The website has been updated by moving Service Animals under the "Accessibility" page of the website. The new statement is "Service animals are welcome in all park facilities."

- **Short-term**

## Public Safety

### Emergency Preparedness

Emergency preparedness plans should address the communication, physical access, shelter, and medical needs of people with disabilities.

**Recommendation:** Incorporate preparedness considerations for visitors and employees with disabilities into the park emergency plan. The [Federal Emergency Management Agency Office of Disability Integration and Coordination](#) can serve as a planning resource.

- **Short-term**

### Law Enforcement

**Recommendation:** Procedures should be confirmed with responding agencies regarding accessibility accommodations for visitors with disabilities during interviews, interrogations, transport, or custody. A written policy should be developed with the local law enforcement agency and CUVA law enforcement to identify the responsibilities of retaining the services of a sign language interpreter, and options and procedures for transporting individuals with disabilities who use assistive devices and require accessible transportation.

- **Short-term**



## Business Management

### Notice to Contractors Acting on Behalf of the Agency

**Recommendation:** The Park maintains a cooperating association agreement for a gift shop in the visitor center with Eastern National. Ensure that gift shop staff is aware of the responsibilities to comply with non-discrimination practices. Staff should be prepared to assist customers with disabilities to access merchandise that may be out of reach and ensure that clear paths of travel are maintained and that no protruding objects are within the paths of travel.

- **Short-term**

## Communications

Section 504 requires that the agency take appropriate steps to ensure effective communication with applicants, participants, personnel of other Federal entities, and members of the public. The provision of auxiliary aids and services may be necessary to ensure that communication with people with disabilities is as effective as communication for people without disabilities.

### Public Information

#### Website

**Recommendation:** The website information in the Accessibility section has been updated to indicate that the film is open-captioned. The information about “descriptive audio” has been deleted until such time as the audio description track has been corrected. In addition, the accessible restrooms have been identified as only in the Visitor Center, so visitors should plan their visit to the Memorial accordingly.

**Recommendation:** Establish a policy that all public meetings will be held in physically-accessible locations and add a statement to any marketing regarding how a person with a disability can request accommodations. Include a name and contact information and provide specific information on how much time is needed for a request. Prepare public meeting printed materials in alternate formats. Depending on the nature of the meeting maps or models of physical changes may be required.

- **Short-term**

## Publications

**Recommendation:** Design and publish the primary park Unigrid brochure in large print as well as Braille versions. Accessible .PDF and .TXT versions of primary publications should be posted on the park website. A procedure should be developed for receiving requests for alternative formats and having publications translated by appropriate service providers. An agreement with a designated Braille translation service should be established prior to receiving requests.

- **Short-term**

## Auxiliary Aids and Services

**Recommendation:** Identify local resources and a list of preferred service providers for sign language interpreters, real-time captioning, and live audio description. Develop a policy to inform the public on the process to request auxiliary aids and services, and publish the information on the park website and park newspaper. Staff should be trained to intake accommodation requests.

Develop a standard operating procedure for testing, cleaning, and maintaining the assistive listening systems.

Train staff seasonally on the availability of auxiliary aids and services along with the procedures to accommodate visitors with disabilities.

- **Short-term**

## User Groups, Events and Special Permits

Special permits are issued for commercial operations and public events consistent with the purpose and mission of the park. Groups seeking permits for public activities may lack knowledge of their responsibilities to provide access to people with disabilities.

**Recommendation:** Develop a publication for user groups receiving special permits outlining their legal responsibilities to provide access to people with disabilities while conducting a program or special event on NPS lands. Also consider developing a special events checklist for event planners to use to ensure preparation for meeting program access responsibilities. User groups should be informed of accessible locations and facilities to select sites that best meet the needs of their group.

- **Short-term**

## Electronic and Information Technology

Section 508 requires all electronic and information technology used by the federal government to be accessible to people with disabilities, both the public and federal employees.

**Recommendation:** The Park is following Section 508 requirements for electronic and information technology in the park’s website information, social media, and publications. Continue to provide training on the electronic and information technology barriers encountered by the people with disabilities. Training should also provide an overview of technology solutions specific to different disability groups, like people with hearing impairments, people with visual impairments, people with physical disabilities, and people with cognitive disabilities.

## Program and Service Delivery

### Accommodation Process

To enable participation by people with disabilities, it may be necessary to provide disability-related accommodations by either modification of procedures or the provision of auxiliary aids.

**Recommendation:** The Park should formally appoint a lead person for accessibility-coordinating responsibilities within the interpretive division. This responsibility should be reflected in the position description. This staff should become the central point of contact for disability-related requests. Under the “Accessibility” section of the park website, add information on the types of accommodations and auxiliary aids available for visitors with disabilities. Include contact information for visitors to make a direct request to the coordinator.

- **Short-term**

### Interpretive Program Talks and Tours

**Recommendation:** Portable assistive listening systems should be made available for ranger-led interpretive talks. Interpretive staff and volunteers should be trained on the use of the assistive listening system, techniques for audio description, and methods to adapt content to the needs of people with various sensory and cognitive impairments. Interpretive staff and volunteers should be encouraged to develop tactile content as well as visual and audio content for their programs.

- **Mid-term**

## Staff Training

Park personnel have a commitment to serving visitors with disabilities.

**Recommendation:** Formal training on the accessibility standards, program access, universal design, and access of interpretive programs is recommended for the accessibility coordinator and members of the accessibility coordinating committee. A training module specific to disability awareness and customer service for visitors with disabilities should be implemented as part of an annual training program and targeted for seasonal and front-line park staff, volunteers, park partners, and concessioners. Front line staff and volunteers should be trained on disability awareness, appropriate terminology for specific disabilities and people with disabilities, accessible features and routes at their site, and auxiliary aids and services available to visitors with disabilities. Staff and volunteers should be trained to announce accessibility options as part of general visitor orientations.

- **Mid-term**

## Compliance

Section 504 requires certain administrative procedures to ensure compliance, including the designation of a procedure for receiving and investigating complaints.

## Complaints

**Recommendation:** Staff should receive training on the process for intake, investigation, and processing of public comments and complaints to include the ability to “flag” accessibility/disability comments and complaints, and channel to an accessibility coordinating committee for review, response, and archival documenting of the corrective actions or actions not taken in lieu of barrier removal.

- **Short-term**

## Accessibility Management Team

While Section 504 does not specify the need for a coordinating team, inclusion of visitors with disabilities is most successful in park units where accessibility compliance is addressed as a team approach.

**Recommendation:** The establishment of an accessibility management team is recommended for the park. The team should include representatives of the various park divisions (facility operations, interpretation, cultural resources, etc.). The accessibility coordinator should work directly with the accessibility management team for ongoing

prioritization of the transition plan, policy review, and modification to procedures where necessitated.

- **Short-term**



# Chapter 4: Conclusion

Perry's Victory and International Peace Memorial is committed to providing all visitors the opportunity to connect with and learn about the park's unique cultural resources. Accessibility improvements identified in the Perry's Victory and International Peace Memorial Accessibility Management Plan (AMP) will make it easier for individuals with cognitive, hearing, vision, and mobility disabilities to discover, understand, and enjoy the range of experiences available at the park. Implementation of the plan will ensure that Perry's Victory and International Peace Memorial will continue to work toward accommodating all park visitors while sustaining its legacy to preserve, protect, and interpret its resources (Figure 4-1).

The accessibility management plan is a living document intended to be used as a guiding reference for the park as it implements accessibility upgrades and documents accessibility accomplishments. As barriers to accessibility are removed and/or improved, the changes shall be updated in this plan. The park shall conduct periodic reviews to evaluate and update conditions to reflect accomplishments and to document new programs or other changes that occur over time. Revisions to the plan may include conducting additional assessments for areas not originally conducted as a part of this plan.



*Figure 4-1. View of the park visitor center and the Memorial column from the west. Commonwealth.*

For visitors with mobility impairments, access will be improved from the moment they enter the park. Facilities, as well as numerous programs, services, and activities the park has to offer, will be more universally accessible. Key park experiences, including learning about the Battle of Lake Erie, viewing the battle site from the Memorial column observation deck, participating in living history events, attending performances at the park; attending Junior Ranger programs and ranger talks; learning about the burial crypt in the Rotunda; making social connections through events and volunteerism; viewing the sunset or sunrise over Lake Erie and Put-In-Bay; enjoying the natural environment of the lake and park; and purchasing materials and souvenirs from the visitor center's gift shop, will be enhanced.

For visitors with vision, hearing, or cognitive disabilities, Perry's Victory and International Peace Memorial will deliver programs, exhibits, and waysides that interpret the resources, the landscape, and their history in new and interactive ways. Additionally, alternative formats such as large-print transcripts, audio description tours, and virtual tours will provide ease of navigation in the park. Self-guided and guided tours will have assistive listening devices and audio description tours available to all.

The results of this collective effort, over time, will make Perry's Victory and International Peace Memorial a truly welcoming and accommodating place for all visitors and will provide equal opportunity to access the many places, resources, histories, and experiences the park has to offer.



# Appendix A: Applicable Accessibility Laws, Standards, Guidelines, and NPS Policies

As a national park, Perry's Victory and International Peace Memorial is required to comply with specific federal laws that mandate that discriminatory barriers be removed to provide equal opportunities to persons with disabilities. The following laws, design guidelines, and Director's Orders specifically pertain to the park.

## LAWS AND STANDARDS

A law is a principle and regulation established in a community by some authority and applicable to its people, whether in the form of legislation or of custom and policies recognized and enforced by judicial decision. A standard is something considered by an authority or by general consent as a basis of comparison; an approved model. It is a specific low-level mandatory control that helps enforce and support a law.

### Architectural Barriers Act of 1968

The Architectural Barriers Act of 1968 requires physical access to facilities designed, built, altered, or leased with federal funds. The Uniform Federal Accessibility Standards (UFAS) are the design guidelines used as the basis for enforcement of the law. The UFAS regulations were adopted in 1984. Architectural Barriers Act Accessibility Standards (ABAAS) were revised and adopted in November 2005. Four federal agencies are responsible for the standards: the Department of Defense, the Department of Housing and Urban Development, the General Services Administration, and the US Postal Service. The United States Access Board was created to enforce the Architectural Barriers Act, which it does through the investigation of complaints. Anyone concerned about the accessibility of a facility that may have received federal funds can easily file a complaint with the United States Access Board.

For more information, refer to "Guide to the ABA Standards" at <https://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-aba-standards/guide-to-the-aba-standards>.

### Section 504 of the Rehabilitation Act of 1973

#### **General**

Section 504 of the Rehabilitation Act of 1973 (P.L. 93-112) applies to departments and agencies of the federal government, including the parks operated by the National Park Service. Both Section 504 and the Architectural Barriers Act require the application of stringent access standards to new construction and the alteration of existing facilities. The Rehabilitation, Comprehensive Services, and Developmental Disabilities Amendments of 1978 (P.L. 95-602)

extend the scope of Section 504 to include Executive Branch agencies of the federal government. As amended, Section 504 states that “[n]o otherwise qualified handicapped individual in the United States, as defined in Section 7(6), shall, solely by reason of his handicap, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance or under any program or activity conducted by any Executive agency or by the United States Postal Service. The head of each such agency shall promulgate such regulations as may be necessary to carry out the amendments to this section made by the Rehabilitation, Comprehensive Services, and Developmental Disabilities Act of 1978. Copies of any proposed regulation shall be submitted to appropriate authorizing committees of Congress, and such regulation may take effect no earlier than the thirtieth day after the date on which such regulation is so submitted to such committees.”

As noted above, Section 504 and the Architectural Barriers Act govern new construction and alterations. However, as a civil rights law, Section 504 goes further. Unlike the construction-driven ABA mandates, Section 504 also requires covered entities to consider the accessibility of programs, services, and activities.

For more information, refer to “Section 504 Regulations” at <https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=ce1f8cee8130911a3d2e053c4ceaedb6&r=SUBPART&n=43y1.1.1.1.17.5>.

#### **Section 17.549 Program Accessibility: Discrimination Prohibited**

Except as otherwise provided in §17.550, no qualified handicapped person shall, because the agency’s facilities are inaccessible to or unusable by handicapped persons, be denied the benefits of, be excluded from participation in, or otherwise be subjected to discrimination under any program or activity conducted by the agency. The reference to §17.550 in the below quotes is intended to address exclusions available to covered entities in connection with existing facilities.

For more information, refer to “Section 504 Regulations” at <https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=ce1f8cee8130911a3d2e053c4ceaedb6&r=SUBPART&n=43y1.1.1.1.17.5>.

#### **Section 17.5.50 Program Accessibility: Existing Facilities**

Federal agencies shall operate each program or activity so that the program or activity, when viewed in its entirety, is readily accessible to and usable by people with disabilities. This does not necessarily require the agency to make all its existing facilities or every part of a facility accessible to and usable by people with disabilities: in the case of historic preservation programs, for example, it does not require the agency to take any action that would result in a substantial impairment of significant historic features of an historic property. Neither does it require the agency to take any action that it can demonstrate would result in a fundamental alteration in the nature of a program or activity or in undue financial and administrative burdens.

#### **Methods:**

(1) **General.** The agency may comply with the requirements of this section through such means as redesign of equipment, reassignment of services to accessible locations, assignment of aides to beneficiaries, home visits, delivery of services at alternate accessible sites, alteration of existing facilities and construction of new facilities, use of accessible rolling stock, or any other methods that result in making its programs or activities readily accessible to and usable by people with disabilities. The agency is not required to make structural changes in existing facilities where other methods are effective in achieving compliance with this section. The agency, in making alterations to existing buildings, shall meet accessibility requirements to the extent compelled by the Architectural Barriers Act of 1968, as amended (42 U.S.C. 4151–4157) and any regulations implementing it. In choosing among available methods for meeting the requirements of this section, the agency shall give priority to those methods that offer programs and activities to qualified handicapped persons in the most integrated setting appropriate.

(2) **Historic preservation programs.** In meeting the requirements of paragraph (a) of this section in historic preservation programs, the agency shall give priority to methods that provide physical access to handicapped persons. In cases where a physical alteration to an historic property is not required because of paragraph (a)(2) or (a)(3) of this section, alternative methods of achieving program accessibility include: (i) Using audio-visual materials and devices to depict those portions of an historic property that cannot otherwise be made accessible; (ii) Assigning persons to guide people with disabilities into or through portions of historic properties that cannot otherwise be made accessible; or (iii) Adopting other innovative methods.

(3) **Recreation programs.** In meeting the requirements of paragraph (a) in recreation programs, the agency shall provide that the program or activity, when viewed in its entirety, is readily accessible to and usable by people with disabilities. When it is not reasonable to alter natural and physical features, accessibility may be achieved by alternative methods as noted in paragraph (b)(1) of this section.

For more information, refer to “Section 504 Regulations” at <https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=ce1f8cee8130911a3d2e053c4ceaedb6&r=SUBPART&n=43y1.1.1.1.17.5>.

### **Section 17.551 Program Accessibility: New Construction and Alterations**

Each building or part of a building that is constructed or altered by, on behalf of, or for the use of the agency shall be designed, constructed, or altered so as to be readily accessible to and usable by handicapped persons. The definitions, requirements, and standards of the Architectural Barriers Act (42 U.S.C. 4151– 4157) as established in 41 CFR 101 – 19.600 to 101 – 19.607 apply to buildings covered by this section.

For more information, refer to “Section 504 Regulations” at <https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=ce1f8cee8130911a3d2e053c4ceaedb6&r=SUBPART&n=43y1.1.1.1.17.5>.

## **Section 508 of the Rehabilitation Act of 1973**

In 1998, Congress amended the Rehabilitation Act of 1973 to require federal agencies to make their electronic and information technology accessible to people with disabilities. Inaccessible

technology interferes with an ability to obtain and use information quickly and easily. Section 508 was enacted to eliminate barriers in information technology, open new opportunities for people with disabilities, and encourage development of technologies that will help achieve these goals. The law applies to all federal agencies when they develop, procure, maintain, or use electronic and information technology. Under section 508 (29 U.S.C. §794 d), agencies must give disabled employees and members of the public access to information that is comparable to access available to others. It is recommended that you review the laws and regulations listed below to further your understanding about section 508 and how you can support implementation.

For more information, refer to “IT Accessibility Laws and Policies” at <https://www.section508.gov/manage/laws-and-policies>.

## Draft Accessibility Standards for Public Rights-of-Way (2011)

Sidewalks, street crossings, and other elements in the public right-of-way can pose challenges to accessibility. The US Access Board’s ADA and ABA Accessibility Guidelines focus mainly on facilities on sites. While they address certain features common to public sidewalks, such as curb ramps, further guidance is necessary to address conditions and constraints unique to public rights-of-way. The board had developed draft standards for public rights-of-way that address various issues, including access for blind pedestrians at street crossings, wheelchair access to on-street parking, and various constraints posed by space limitations, roadway design practices, slope, and terrain. Once adopted, the new standards will cover pedestrian access to sidewalks and streets, including crosswalks, curb ramps, street furnishings, pedestrian signals, parking, and other components of public rights-of-way. The board’s aim in developing these guidelines is to ensure that access for persons with disabilities is provided wherever a pedestrian way is newly built or altered, and that the same degree of convenience, connection, and safety afforded the public generally is available to pedestrians with disabilities. Once these guidelines are adopted by the Department of Justice, they will become enforceable standards under ADA title II.

For more information, refer to “Proposed Guidelines for Pedestrian Facilities in the Public Right-of-Way” at <https://www.access-board.gov/guidelines-and-standards/streets-sidewalks/public-rights-of-way/proposed-rights-of-way-guidelines>.

## Effective Communication

People who have vision, hearing, or speech disabilities, or “communication disabilities,” use different ways to communicate. For example, people who are blind may give and receive information audibly rather than in writing and people who are deaf may give and receive information through writing or sign language rather than through speech. The Americans with Disabilities Act standards require that Title II entities (state and local governments) and Title III entities (businesses and nonprofit organizations that serve the public) communicate effectively with people who have communication disabilities. The goal is to ensure that communication with people with these disabilities is equally effective as communication with people without

disabilities. The purpose of the effective communication rules is to ensure that the person with a vision, hearing, or speech disability can communicate with, receive information from, and convey information to, the covered entity. Covered entities must provide auxiliary aids and services when needed to communicate effectively with people who have communication disabilities. The key to communicating effectively is to consider the nature, length, complexity, and context of the communication and the person's normal method(s) of communication. The rules apply to communicating with the person who is receiving the covered entity's goods or services as well as with that person's parent, spouse, or companion in appropriate circumstances.

For more information, refer to "Effective Communication" at <http://www.ada.gov/effective-comm.htm>.

## Reasonable Accommodations

Federal agencies are required by law to provide reasonable accommodation to qualified employees with disabilities. The federal government may provide reasonable accommodation based on appropriate requests (unless so doing will result in undue hardship to the agencies). Reasonable accommodations can apply to the duties of the job and/or where and how job tasks are performed. The accommodation should make it easier for the employee to successfully perform the duties of the position. Examples of reasonable accommodations include providing interpreters, readers, or other personal assistance; modifying job duties; restructuring work sites; providing flexible work schedules or work sites (i.e., telework); and providing accessible technology or other workplace adaptive equipment. Telework provides employees additional flexibility by allowing them to work at a geographically convenient alternative worksite, such as home or a telecenter, on an average of at least one day per week. Requests are considered on a case-by-case basis. Employees can request reasonable accommodation by looking at the vacancy announcements, working directly with persons arranging interviews, contacting the agency's Selective Placement Program Coordinator, contacting the hiring manager and engaging in an interactive process to clarify needs and identify reasonable accommodations, and making an oral or written request; no special language is needed.

For more information, refer to "Equal Employment Opportunity Commission's Enforcement Guidance: Reasonable Accommodation and Undue Hardship under the Americans with Disabilities Act" at <https://www.eeoc.gov/policy/docs/accommodation.html>.

## Other Powered Mobility Devices

The definition and regulation to permit the use of mobility devices has been amended. The rule adopts a two-tiered approach to mobility devices, drawing distinctions between wheelchairs and other power-driven mobility devices such as the Segway Human Transporter. Wheelchairs (and other devices designed for use by people with mobility impairments) must be permitted in all areas open to pedestrian use. Other power-driven mobility devices must be permitted to be used unless the covered entity can demonstrate that such use would fundamentally alter its programs, services, or activities, create a direct threat, or create a safety hazard. The rule also lists factors to consider in making this determination.

For more information, refer to “Wheelchairs, Mobility Aids, and Other Power-Driven Mobility Devices” at <https://www.ada.gov/opdmd.htm>.

## Service Animals

Service animals are any dog (or miniature horse as outlined below) that is individually trained to do work or perform tasks for the benefit of an individual with a disability, including a physical, sensory, psychiatric, intellectual, or other mental disability. Other species of animals, whether wild or domestic, trained or untrained, are not service animals for the purposes of this definition. The work or tasks performed by a service animal must be directly related to the handler’s disability. Examples of work or tasks include, but are not limited to, assisting individuals who are blind or have low vision with navigation and other tasks, alerting individuals who are deaf or hard of hearing to the presence of people or sounds, providing nonviolent protection or rescue work, pulling a wheelchair, assisting an individual during a seizure, alerting individuals to the presence of allergens, retrieving items such as medicine or the telephone, providing physical support and assistance with balance and stability to individuals with mobility disabilities, and helping persons with psychiatric and neurological disabilities by preventing or interrupting impulsive or destructive behaviors. The crime deterrent effects of an animal’s presence and the provision of emotional support, well-being, comfort, or companionship do not constitute work or tasks for the purposes of this definition.

Service animals must be allowed to accompany people with disabilities in all areas of a facility where the public is normally allowed to go. These animals must be harnessed, leashed, or tethered, unless these devices interfere with the service animal’s work or the individual’s disability prevents using these devices. In that case, the individual must maintain control of the animal through voice, signal, or other effective controls.

As described by the US Department of Justice, rules related to service animals include:

- When it is not obvious what service an animal provides, facility staff may ask two questions: (1) is the dog a service animal required because of a disability? and (2) what work or task has the dog been trained to perform? Staff cannot ask about the person’s disability, require medical documentation, require a special identification card or training documentation for the animal, or ask that the animal demonstrate its ability to perform the work or task.
- Allergies and fear of service animals are not valid reasons for denying access or refusing service to people using service animals. When a person who is allergic to the animal and a person who uses a service animal must spend time in the same room or facility, they both should be accommodated by assigning them, if possible, to different locations within the room or different rooms in the facility.
- A person with a disability cannot be asked to remove their service animal from the premises unless: (1) the animal is out of control and the handler does not take effective action to control it or (2) the animal is not housebroken. When there is a legitimate reason to ask that a service animal be removed, staff must offer the person with the disability the opportunity to obtain goods or services without the animal’s presence.

- Establishments that sell or prepare food must allow service animals in public areas even if state or local health codes prohibit animals on the premises.
- People with disabilities who use service animals cannot be isolated from other patrons, treated less favorably than other patrons, or charged fees that are not charged to other patrons without animals. In addition, if a business requires a deposit or fee to be paid by patrons with pets, it must waive the charge for service animals.
- If a business such as a hotel normally charges guests for damage that they cause, a customer with a disability may also be charged for damage caused by himself or his service animal.
- Staff of public facilities are not required to provide care or food for a service animal.

Revised ADA regulations have a new, separate provision about miniature horses that have been individually trained to do work or perform tasks for people with disabilities. Miniature horses generally range in height from 24 inches to 34 inches measured to the shoulders and generally weigh between 70 and 100 pounds. Entities covered by the ADA must modify their policies to permit miniature horses where reasonable. The regulations set out four assessment factors to assist entities in determining whether miniature horses can be accommodated in their facility: (1) whether or not the miniature horse is housebroken; (2) whether or not the miniature horse is under the owner's control; (3) whether or not the facility can accommodate the miniature horse's type, size, and weight; and (4) whether or not the miniature horse's presence will not compromise legitimate safety requirements necessary for safe operation of the facility.

For more information, refer to "Service Animals" at [https://www.ada.gov/service\\_animals\\_2010.htm](https://www.ada.gov/service_animals_2010.htm).

## **NATIONAL PARK SERVICE DIRECTOR'S ORDERS AND MANAGEMENT POLICIES**

A policy is a definite course of action adopted and pursued by a government, ruler, or political party. It is an action or procedure conforming to or considered with reference to prudence or expediency.

### **Director's Order 16A: Reasonable Accommodation for Applicants and Employees with Disabilities**

Director's Order 16A establishes the framework for meeting reasonable accommodation requirements in all areas of employment, including: application, hiring, retention, promotion, recognition, and special hiring authority. Within this framework, National Park Service Human Resources and Equal Opportunity Program officials will take the lead in providing specific guidance and services to applicants, employees, and supervisors and other managers with respect to the provision of reasonable accommodation.

For more information, refer to "Director's Order 16A" at <http://www.nps.gov/policy/DOrders/DOrder16a.html>.



## Director's Order 42: Accessibility for Visitors with Disabilities in National Park Service Programs and Services

Director's Order 42 addresses accessibility for visitors with disabilities in National Park Service programs and services. It is the goal of the National Park Service to ensure that all people, including persons with disabilities, have the highest level of access that is reasonable to NPS programs, facilities, and services. The order gives detailed guidance based on the minimum requirements set forth in laws, rules, and regulations with the goal to provide the highest level of access that is reasonable, exceeding the minimum level of access required by law. The order sets forth six implementation strategies:

- 1) to increase employee awareness and technical understanding of accessibility requirements;
- 2) to ensure all new and renovated buildings and facilities, and all new services and programs (including those offered by concessioners and interpreters) will be "universally designed" and implemented in conformance with applicable regulations and standards;
- 3) to ensure existing programs, facilities and services will be evaluated to determine the degree to which they are currently accessible to and useable by individuals with disabilities;
- 4) to ensure that barriers that limit access be identified and incorporated into the NPS Assets Management Program;
- 5) to develop action plans identifying how identified barriers will be removed (where feasible); and
- 6) to ensure action will be taken on a day-to-day basis to eliminate identified barriers, using existing operational funds or other funding sources or partnerships.

For more information, refer to "Director's Order 42" at <http://www.nps.gov/policy/DOrders/DOrder42.html>.

## National Park Service Management Policies: Section 1.9.3 – Accessibility for Persons with Disabilities

All practicable efforts will be made to make National Park Service facilities, programs, services, employment, and meaningful work opportunities accessible and usable by all people, including those with disabilities. This policy reflects the commitment to provide access to the widest cross section of the public and ensure compliance with the Architectural Barriers Act of 1968, the Rehabilitation Act of 1973, the Equal Employment Opportunity Act of 1972, and Americans with Disabilities Act of 1990. Specific guidance for implementing these laws is found in the Secretary of the Interior's regulations regarding enforcement and nondiscrimination on the basis of disability in Department of the Interior programs (43 CFR par 17, subpart E), and the General Service Administration's regulations adopting accessibility standards for the Architectural Barriers Act (41 CFR part 102-76, subpart C). A primary principle of accessibility is that, to the highest degree practicable, people with disabilities should be able to participate in the same programs, activities, and employment opportunities available to everyone else. In



choosing among methods of providing accessibility, higher priority will be given to methods that offer programs and activities in the most integrated setting appropriate. Special, separate, or alternative facilities, programs, or services will be provided only when existing ones cannot reasonable be made accessible. The determination of what is practicable will be made only after careful consultations with persons with disabilities or their representatives. Any decisions that would result in less than equal opportunity is subject to the filing of an official disability right complaint under the departmental regulations cited above.

For more information, refer to “Management Policies 2006” at <http://www.nps.gov/policy/mp/policies.html>.

## **Programmatic Accessibility Guidelines for National Park Service Interpretive Media**

These guidelines are for media specialists, superintendents, and other National Park Service employees and contractors who develop and approve interpretive media. Publications, exhibits, audiovisual programs and tours, wayside exhibits, signage, and web-based media provide park visitors with information and context so that their experience of visiting national parks can be both safe and meaningful. Park visitors who have physical, sensory, or cognitive disabilities have legally established civil rights to receive the same information and context that NPS.

For more information, refer to “Programmatic Accessibility Guidelines for National Park Service Interpretive Media” at <https://www.nps.gov/features/hfc/guidelines/>.

# Appendix B: Glossary of Terms

**Accessibility assessment:** A process in which physical and programmatic barriers to accessibility are identified at a park unit.

**Accessibility assessment team:** This group is a subgroup of the Interdisciplinary Design Team (see definition below) and includes an accessibility specialist and/or technician, coordinators, a regional representative, the primary facilitator for the process, architect, engineer and/or landscape architect, and typically the chiefs of interpretation, resources management, and facilities management.

**Accessibility Management Plan:** A tool that establishes a methodical process for identifying and improving park wide access, both physical and programmatic, and proposes strategies for implementing the plan over time, in a manner consistent with park requirements and protocols.

**Accessibility Self-Evaluation and Transition Plan:** A tool that establishes a methodical process for identifying and improving park wide access and proposes strategies for implementing the plan over time, in a manner consistent with park requirements and protocols.

**Architectural Barriers Act Accessibility Standards (ABAAS):** Standards issued under the Architectural Barriers Act apply to facilities designed, built, altered, or leased with certain federal funds. Passed in 1968, the Architectural Barriers Act was one of the first laws to address access to the built environment. The law applies to federal buildings, including post offices, social security offices, federal courthouses and prisons, and national parks.

**Barrier:** Architectural and programmatic obstacles to accessibility that make it difficult, and sometimes impossible, for people with disabilities to maneuver, understand, or experience.

**Best practices:** A method or technique that has consistently shown results superior to those achieved with other means, and that is used as a benchmark for meeting accessibility requirements.

**Consultation:** A formal or informal process for discussing an action or process for implementing a solution, such as section 106 (cultural resource compliance), or design for an Accessibility Self-Evaluation and Transition Plan.

**Facility Management Software System (FMSS) Work Order:** The process for documenting work needs and collecting information to aid the work scheduling and assignment process within the Facility Management Software System. Information collected should include labor, equipment and material costs, hours, types, and quantities.

**Guidelines:** An indication of a future course of action, a guideline consists of recommended, nonmandatory controls that help support standards or serve as a reference when no applicable standard is in place.

**Interdisciplinary design team:** Composed of all the people involved in the workshop at the park unit, this team potentially includes planning, design, and construction professionals, and

interpretive, resource (natural and cultural), visitor safety, maintenance and accessibility specialists.

**Key park experiences:** Experiences offered by the park that are iconic and important for visitors to understand the purpose and significance of a given park unit. They are those experiences that are “musts” for all park visitors and can be identified through a consideration of park purpose, significance, interpretive themes, and those programs or activities highlighted in park communications.

**Laws:** A principle and regulation established in a community by some authority and applicable to its people, whether in the form of legislation or of custom and policies recognized and enforced by judicial decision.

**Level of access:** The general degree of accessibility for programs, considering key park experiences, levels of disability, availability of physical and programmatic access, and priorities for action.

**National Environmental Policy Act (NEPA) Requirements:** A process that federal agencies must follow when proposing to take actions that have environmental impacts. NEPA requires federal agencies to fully consider the impacts of proposals that would affect the human environment prior to deciding to take an action, and involve the interested and affected public in the decision-making process.

**Park areas:** The geographic location that is home to a single or multiple key park experience(s).

**Park Asset Management Plan-Optimizer Banding (PAMP-OB):** Five-year asset management strategy for park units, allowing for annual updates that coincide with the budget and planning processes already occurring in park units. As this approach includes life cycle total cost of ownership, analysis, processing, and calculations, it also helps park units and the overall service to manage the gap between what should be spent on facilities and what is actually being spent.

**Park policy:** Those defined courses of action for reaching a desired outcome that are adopted by the park.

**Park practices:** Those habitual and/or customary performances or operations for reaching a desired outcome that the park employs.

**People-first language:** A type of disability etiquette that aims to avoid perceived and subconscious dehumanization when discussing people with disabilities. It emphasizes the person rather than the disability, noting that the disability is not the primary defining characteristic of the individual but one of several aspects of the whole person.

**Policy:** A definite course of action or procedure adopted and pursued by a government or other guiding entity and conforming to or considered with reference to prudence or expediency.

**Project Management Information System (PMIS) Facility:** A separate and individual building, structure, or other constructed real property improvement.

**Project Management Information System (PMIS) Non-facility:** A project that includes anything not covered by the definition for PMIS facility.

**Project Management Information System (PMIS) # (number):** A unique Project ID that is automatically generated when adding a new project into the Project Management Information System.

**Project planning team:** This group is a subgroup of the Interdisciplinary design team and includes NPS planners and a regional liaison. This team collects baseline data, facilitates calls, develops the participant guide, plans for and facilitates the workshop, and produces the draft and final documents.

**Readily-achievable:** Easily accomplished and able to be carried out without much difficulty or expense.

**Responsible person:** The person/position responsible for seeing that the elimination of a barrier is completed.

**Service, activity, and program:** A single-purpose activity undertaken by a department that affords benefits, information, opportunities, and activities to one or more members of the public.

**Solution:** The action to eliminate the barrier that has been identified.

**Standards:** Basis of comparison or an approved model, usually a specific, low-level mandatory control that helps enforce and support a law.

**Time frame:** Describes when staff will eliminate the identified barrier, usually divided into three time frames including: short-term, mid-term, and long-term. Time frames for implementation of a recommended solution are primarily based on level of access of the barrier.

# Appendix C: Contributors

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# Bibliography

NPS Midwest Regional Office, Perry's Victory and International Peace Memorial Foundation Document (Omaha NE: NPS, 2012), 3.

US Access Board. "Architectural Barriers Act (ABA) Standards (2015)." <https://www.access-board.gov/attachments/article/1029/ABASTandards.pdf> (accessed June 14, 2018).

US Department of Labor. Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 701), Sec. 17.530. <https://www.dol.gov/oasam/regs/statutes/sec504.htm> (accessed January 4, 2017).