ACCESSIBILITY SELF-EVALUATION AND TRANSITION PLAN MINIDOKA NATIONAL HISTORIC SITE IDAHO

APRIL 2019

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EXECUTIVE SUMMARY

The Minidoka National Historic Site Accessibility Self-Evaluation and Transition Plan (SETP) includes findings from the self-evaluation process, as well as a plan for improving accessibility parkwide. The Accessibility Self-Evaluation and Transition Plan resulted from the work of an NPS interdisciplinary team, including planning, design, and construction professionals; and interpretive, resource, visitor safety, maintenance, and accessibility specialists. Site plans, photographs, and specific actions for identified park areas were developed. Associated time frames and implementation strategies were established to assist NPS park staff in scheduling and performing required actions and to document completed work. Park policies, practices, communication, and training needs were also addressed. The goals of the plan are to 1) document existing park barriers to accessibility for people with disabilities, 2) provide an effective approach for upgrading facilities, services, activities, and programs, and 3) instill a culture around creating universal access.

The following are the key park experiences and associated park areas addressed in the transition plan:

- 1) Understand the role that "race prejudice, war hysteria, and a failure of political leadership" played, and the profound impacts World War II had on life in the United States Block 22, Camp Entrance Area, Herrmann House/Fire Station #1 Area, Interpretive Trail
- 2) Empathize with those imprisoned and their sense of abandonment by their country and the isolation described by incarcerees at Minidoka Block 22, Camp Entrance Area, Interpretive Trail
- 3) Reflect on how the Nikkei community's incarceration experience affected their ties to the communities they left behind on the West Coast, those they created at Minidoka and their impact in Idaho, and those they created post World War II, and how governmental policies challenged their American citizenship, patriotism, honor and sacrifice, and shaped events Ballfield Area, Block 22, Camp Entrance Area, Herrmann House/Fire Station #1 Area, Interpretive Trail, Warehouse Area
- 4) Learn about daily life for prisoners of Minidoka and their interactions with the surrounding communities during World War II Ballfield Area, Block 22, Camp Entrance Area, Herrmann House/Fire Station #1 Area, Interpretive Trail, Warehouse Area
- 5) View historic structures and the cultural landscape and experience daily life during camp construction, operation, deconstruction, and post-World War II-era homesteading period Ballfield Area, Block 22, Camp Entrance Area, Herrmann House/Fire Station #1 Area, Interpretive Trail, Warehouse Area

6) Learn about the U.S. government's decades-long redress process resulting in an official government apology and reparation for the exclusion and mass incarceration of Japanese Americans and the efforts to promote public education about civil liberties, citizenship, freedom, human rights, and justice – Block 22, Camp Entrance Area, Herrmann House/Fire Station #1 Area, Interpretive Trail, Warehouse Area

Overall, similar services, activities, and programs were found throughout park areas, as were assessment findings for physical and program accessibility.

PHYSICAL ACCESSIBILITY

Recurrent findings were generally identified for parking areas, accessible paths of travel, trails, benches, and visitor information boards such as interpretive panels, waysides, and trailhead signs. These findings included routes that were missing, surfaces that were not firm and stable, and some slopes that exceeded allowable standards. Some signage was also missing, had illegible content, or had insufficient or misplaced information.

Other physical access issues where improvements are recommended include improving landings at waysides and brochure boxes, stabilizing the surface of the Interpretive Trail, adding routes to the ballfield and Block 22 buildings, and improving maneuvering space and clear floor space inside restrooms. In general, landings were uneven at waysides, brochure boxes, and benches. Where available, accessible parking stalls were narrow. The 1-mile Interpretive Trail is mostly accessible, with manageable slopes and a level surface, and it provides a great route to tour site features. To maintain its accessibility, the park should regularly update the surface of the trail by adding a stabilizer and recurrently ensure that resting spaces are compliant in locations with high running slopes. New accessible routes should be constructed between the Interpretive Trail and the barracks and mess hall buildings at Block 22, in addition to the accessible seating options at the ballfield. Maneuvering space and clear floor space of interior and exterior restrooms at the Herrmann House/Fire Station #1 Area is not appropriate for a wheelchair user.

PROGRAM ACCESSIBILITY

Recurring findings related to program accessibility included font at interpretive waysides and exhibits that require modifications to meet size and readability standards. In general, interpretive panels, waysides, publications, and videos did not have alternate formats in Braille, large print, open captioning, or audio or electronic formats. Audio description for ranger-led interpretive tours and self-guided tours that describe visual elements to persons with low or no vision were also not available. Assistive listening devices were not available for people with hearing loss for guided tours or special events. Audio description for ranger-led interpretive tours and self-guided tours that describe visual elements to persons with low or no vision were also not available. Audio exhibits on interpretive signs at the Camp Entrance Area and on the Interpretive Trail had broken speakers and were unusable.

Specific areas in which program access could be improved include trailhead signage for the Interpretive Trail, new tactile maps and models, live audio description, and providing alternative methods to view the names on the Honor Roll. Trailhead signage provides visitors a way to view the accessibility of the trail and compare it with their own physical ability, and these trail characteristics should also be included on the Accessibility page of the park website. Tactile maps of the camp during its period of significance and a comparison piece of today would help to share its story with visitors and orient them with its layout and significance. Additional tactile models of individual buildings would further enrich their experiences and understanding of the site. Live audio description on guided tours would also deepen the awareness of visitors and reinforce the sense of place, abandonment, and isolation felt by incarcerees at the historic site. Since the text on the Honor Roll may be difficult for some visitors to read, the team discussed creating a binder containing all of the names and making it available in Braille and large print.

PARKWIDE ACCESSIBILITY

Some of the more noteworthy parkwide accessibility challenges that were discussed by the planning team during the self-evaluation and assessment process include: renovating the entrances to the barracks and mess hall on Block 22 to be accessible and developing accessible routes to each building; providing an accessible route to the ballfield; and ensuring that the new visitor center at the Warehouse Area is accessible.

It is recommended that the park employ trained consultants to assist in determining how best to address accessibility improvements parkwide and to ensure that design and implementation of alternate format programs meet the needs of the intended audiences. Notify visitors through signage placed in appropriate locations and in park publications that alternative formats are available.

Creating parkwide accessibility requires staff awareness, understanding, and appropriate action. The assessment process served as a field training tool that increases staff knowledge and commitment toward embracing accessibility as a core park value. Continued training in physical and programmatic access requirements for all park staff, particularly those in maintenance and interpretation, is strongly advised.

Because of fiscal constraints and limited park resources, staff will need to determine which park area improvements will benefit the greatest numbers of park visitors with disabilities. Suggested implementation time frames and relative costs need to be factored into all accessibility investment decisions.

Minidoka National Historic Site strives to be inclusive and welcoming. The park is actively pursuing accessibility improvements through construction of the Interpretive Trail, improved audiovisuals, and a park app. The park Unigrid is available in Braille and some of the available media is open-captioned. Park staff is knowledgeable about existing programmatic accessibility challenges, and they are working to address them. The temporary visitor center at the Herrmann House has been converted to be as accessible as

feasible, with parking, ramp, restroom, and information desk. The new visitor center in construction at the Warehouse Area will open up new avenues for interpretation and visitor orientation, and its accessibility will introduce visitors with disabilities to the site and orient them to the accessible opportunities available.

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INTRODUCTION

Since 1916, the National Park Service (NPS) has preserved, unimpaired, the natural and cultural resources and values of the national park system, while also providing for the enjoyment, education, and inspiration of current and future generations.

Many of our national parks were founded because of their stunning views, extreme and unique geography, challenging and sensitive natural environments, and historic and fragile structures. This park, Minidoka National Historic Site, and other parks exist because of their history and resources. The NPS mission balances protection of resources (both natural and cultural) with visitation. Facilities, services, activities, and programs were designed and built within parks to accommodate our visitors and help them better understand each park purpose and significance.

Many facilities were constructed prior to the passage of laws and policies that reflect the commitment of the National Park Service to provide access to the widest cross section of the public and to ensure compliance with the Architectural Barriers Act of 1968, the Rehabilitation Act of 1973, the Equal Employment Opportunity Act of 1972, and the Americans with Disabilities Act of 1990 (42 USC 12207). The accessibility of commercial services within national parks is also governed by all applicable federal laws. After 100 years of operation, the National Park Service continues to work toward a more inclusive environment. The more than 400 park units that comprise the national park system today include not only the large western parks, for which the agency is well known, but also nationally significant urban parks, historic sites, monuments, parkways, battlefields, and a diversity of other park types across the country.

For a century, the National Park Service has been a leader in connecting people to both our natural and cultural heritage. Visitors today have different needs and expectations, and the agency must adapt to meet these changing demands. Modern scientific research and visitor trend analysis provide new insight into accessibility opportunities and challenges in the national park system. There are approximately 60 million people with disabilities in the United States today, and the number is expected to rise to 71 million in upcoming years as more baby boomers reach retirement age (people 65 and older). This information helps the National Park Service understand changing visitation patterns, the nexus between resource stewardship and accessibility, and the impacts of managing visitors, resources, and infrastructure against the threat of decreased funding. Adequate planning can identify solutions to challenges and provide services with the knowledge and understanding that serves as a trajectory full of opportunity for current and future visitors. The National Park Service is committed to making NPS facilities, programs, services, and employment opportunities accessible to all people, including those with disabilities.

PARK DESCRIPTION

On January 17, 2001, Minidoka Internment National Monument was established through a presidential proclamation as the 385th unit of the national park system, preserving and protecting 72.75 acres of the original 33,000-acre Minidoka War Relocation Center in Jerome County, Idaho. The U.S. Congress later passed Public Law 110-229 on May 8, 2008, expanding the national monument to 388 acres, changing the name to Minidoka National Historic Site, and adding the Bainbridge Island Japanese American Memorial in Washington State to the national park unit. In 2014, Congress passed Public Law 113-171, renaming the memorial Bainbridge Island Japanese American Exclusion Memorial. Collectively, these two locations, 700 miles apart, make up the Minidoka National Historic Site. They offer the opportunity to interpret the historic events and lives impacted by the exclusion, forced removal, and unjust incarceration of Nikkei during World War II.

Minidoka – Idaho

In the high desert of south-central Idaho, Minidoka National Historic Site manages 388 acres of the original Minidoka War Relocation Center site. The surrounding landscape is characterized by rolling hills of sagebrush, farms, and fields used for agricultural production and a network of irrigation canals and ditches. Minidoka is northeast of Twin Falls, a population center of approximately 100,000 people.

During World War II, Minidoka War Relocation Center was one of 10 camps operated by the War Relocation Authority. Construction of Minidoka began on June 5, 1942, and the first incarcerated Nikkei arrived on August 10, 1942, while the camp was still under construction. Minidoka contained more than 600 buildings, which included administrative and warehouse buildings, 36 residential blocks, schools, fire stations, and a hospital. Each residential block contained 15 buildings: 12 barracks, a recreational hall, a mess hall, and a lavatory-laundry building. Minidoka's population peaked at 9,500, with more than 13,000 Nikkei from Alaska, Washington, Oregon, and California passing through its gates until it officially closed on October 28, 1945. Throughout the late 1940s and early 1950s, plots of land, buildings, and even furniture that once made up Minidoka were given away in lotteries by the U.S. Bureau of Reclamation to returning World War II veterans as homesteads and farms. The irrigated fields and agricultural landscape remain as an enduring legacy of the Nikkei communities once incarcerated at Minidoka.

Minidoka was formally listed in the National Register of Historic Places on August 18, 1979. With designation as a unit of the national park system in 2001, the historic site of Minidoka was protected for future generations and interprets its important civil rights lessons and the stories and lives of the individuals incarcerated there from 1942 to 1945.

As a unit of the national park system, Minidoka – Idaho is co-managed with Hagerman Fossil Beds National Monument, with administrative offices located in Hagerman, Idaho.

PARK PURPOSE AND SIGNIFICANCE STATEMENTS

In 2016, Minidoka National Historic Site completed a foundation document. Foundation documents provide basic guidance for planning and management decisions by identifying the park purpose, significance, and fundamental resources and values. The Minidoka National Historic Site foundation plan identifies special mandates and administrative commitments and provides an assessment and prioritization of park planning and data needs. Understanding these elements helps set the stage for appropriately integrating accessibility into the overall park priorities and plans. The following foundation elements were identified for Minidoka National Historic Site.

Park Purpose

The purpose of Minidoka National Historic Site is to provide opportunities for public education and interpretation of the exclusion and unjust incarceration of Nikkei— Japanese American citizens and legal residents of Japanese ancestry—in the United States during World War II. Minidoka National Historic Site protects and collaboratively manages resources related to the Minidoka War Relocation Center in Idaho and the Bainbridge Island Japanese American Exclusion Memorial in Washington State.

Park Significance

Human, Civil, and Constitutional Rights

- Fragility of democracy in times of crisis: Minidoka National Historic Site is a compelling venue for engaging in a dialogue concerning the violation of civil and constitutional rights, the injustice of exclusion, forced removal and incarceration of the Nikkei community, the history of racism and discrimination in the United States, and the fragility of democracy in times of crisis.
- **Relevancy:** Minidoka National Historic Site encompasses sites in both rural Idaho and near Seattle, Washington, that offer a unique setting to reflect on the exclusion, forced removal, and incarceration experience of the Nikkei community and its relationship to contemporary and future political and social events.
- **Patriotism, citizenship, and choices:** Minidoka National Historic Site provides a forum for understanding how Nikkei demonstrated citizenship and patriotism through individual choices, which affected families and communities. Choices reflected a range of responses including serving valiantly in the military, supporting the war effort on the home front, and protesting the civil injustice.

People

Nikkei legacy: Minidoka dramatically changed the lives of those incarcerated, had
a profound and enduring impact on the Nikkei community, and continues to be a
place of significance in American history.

- Impacts on western agriculture and local communities: The establishment of Minidoka War Relocation Center during World War II had a major and continuing effect on the social and economic fabric of southern Idaho communities.
- **Bainbridge Island community:** Bainbridge Island was, and remains, an example of an integrated and resilient community where many local ties to the excluded Japanese American neighbors remained strong during the war years and beyond. This bond was supported by the efforts of the Bainbridge Review, which was one of the few media sources to be outspoken about the injustice of the exclusion, forced removal, and incarceration.

Place

- **Minidoka War Relocation Center:** Minidoka War Relocation Center was a hastily constructed, densely populated, large-scale facility in an isolated and unforgiving landscape. Within 10 years, Minidoka was transformed from sagebrush steppe to the seventh-largest city in Idaho during the incarceration period and then to a rural homesteading community after the camp closed.
- **Exclusion Order Number 1:** With only six days' notice, 227 Nikkei residents from Bainbridge Island, Washington, were the first of 120,000 people of Japanese ancestry in the United States to be excluded and forcibly removed from their homes under the authority derived from Executive Order 9066.

National and Global Stage

- World War II: Minidoka National Historic Site offers a tangible and personal connection to important historic events of World War II on American soil and provides opportunities to understand the profound impacts of this global conflict on life in the United States.
- **Redress:** In 1988, the U.S. government formally determined that the exclusion and mass incarceration of Japanese Americans during World War II was the product of war hysteria, a long history of racism, and a failure of political leadership. Living survivors received presidential apologies and reparations on behalf of the nation. The creation of the Bainbridge Island Memorial and its inclusion within the boundary of Minidoka National Historic Site are significant steps in the redress process to promote public education about civil liberties, freedom, human rights, and justice.

ACCESSIBILITY SELF-EVALUATION AND TRANSITION PLAN

The creation of a transition plan is mandated by regulations under the Rehabilitation Act of 1973, as they apply to the US Department of the Interior, which states that "No 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.

This Accessibility Self-Evaluation and Transition Plan has been prepared to provide Minidoka National Historic Site a tool for addressing overall needs associated with making the park accessible when viewed in its entirety. The plan is based on an understanding of key park experiences and establishes a methodical process that identifies, prioritizes, and outlines improvements to park accessibility. The plan proposes strategies for implementation over time and in a manner consistent with park requirements and protocols.

All key park experiences and all park areas were identified to ensure that all park programs were considered in the plan. Park areas were then evaluated against measurable criteria to determine which would be assessed for purposes of the plan. Each park area assessed was evaluated to identify barriers that prevented participation in park programs, and the best manner in which access could be improved. In some situations, it is not reasonably practicable to create physical or universal design solutions. A transition plan was drafted documenting the barriers and setting forth a strategy for removing them.

IMPLEMENTATION OF THE PLAN

One of the goals of the plan is to increase accessibility awareness and understanding among staff and volunteers of Minidoka National Historic Site. The park superintendent is responsible for implementing and integrating the plan. The park-designated accessibility coordinator ensures adequate communication to park employees and works with the superintendent to follow up on the implementation and relevancy of the plan by documenting improvements and keeping the plan updated.

ACCESSIBILITY SELF-EVALUATION AND TRANSITION PLAN PROCESS

SELF-EVALUATION

The following graphic illustrates the primary steps in the self-evaluation process. Each step is further described in the following text.



Step 1: Identify Key Park Experiences and Park Areas

Key park experiences are those park experiences that are iconic and important for visitors to understand the purpose and significance of the park unit. They are "musts" for park visitors. Park legislation serves as the foundation for key park experiences, which are identified through park purpose, significance, interpretive themes, and those programs or activities highlighted in park communications. Key park experiences were identified at Minidoka National Historic Site to ensure that planned improvements were prioritized to best increase overall access to the experiences available.

- 1. Understand the role that "race prejudice, war hysteria, and a failure of political leadership" played, and the profound impacts World War II had on life in the United States.
- 2. Empathize with those imprisoned and their sense of abandonment by their country and the isolation described by incarcerees at Minidoka.
- 3. Reflect on how the Nikkei community's incarceration experience affected their ties to the communities they left behind on the West Coast, new ones created at Minidoka, their impact in Idaho, and the communities that they created post World War II; and how governmental policies challenged their American citizenship, patriotism, honor and sacrifice, and shaped events.
- 4. Learn about daily life for prisoners of Minidoka and their interactions with the surrounding communities during World War II.

- 5. View historic structures and the cultural landscape, and experience daily life during camp construction, operation, deconstruction, and the post-World War II-era homesteading period.
- 6. Learn about the U.S. government's decades-long redress process resulting in an official government apology and reparation for the exclusion and mass incarceration of Japanese Americans and the efforts to promote public education about civil liberties, citizenship, freedom, human rights, and justice.

After key park experiences were identified, all park areas were listed. Next, a matrix was developed to determine which key experiences occurred in each park area. A park area is a place defined by the park for visitor or administrative use. All park areas within Minidoka National Historic Site were evaluated per criteria in step 2, to determine which, if not all, areas would be assessed.

Step 2: Identify Park Areas to be Assessed

The criteria below were used to determine which park areas would receive assessments:

- 1) Level of visitation
- 2) Diversity of services, activities, and programs offered in the area
- 3) Geographic favorability (as a whole, the park areas selected reflect a broad distribution throughout the park)
- 4) Other unique characteristics of the site

The areas selected for assessment provide the best and greatest opportunities for the public to access all key park experiences. These park areas received comprehensive assessments as outlined in steps 3 and 4. Areas not assessed at this time are to be assessed and improved as part of future facility alterations or as a component of a future planned construction project.

Step 3: Identify Services, Activities, and Programs in Each Park Area

During step 3, all services, activities, and programs within each park area were identified. This process ensured that during step 4 all visitor amenities within a park area, including both physical and programmatic elements, were reviewed for accessibility. The comprehensive lists of services, activities, and programs were the basis for conducting the six assessments and documenting all elements as they pertained to improving access to park experiences.

Step 4: Conduct Accessibility Assessment

During step 4, an interdisciplinary assessment team identified physical and programmatic barriers and reviewed possible solutions within each park area.

Existing conditions and barriers to services, activities, and programs were discussed on-site by the assessment team. The assessment team then developed a reasonable range of

recommended actions for consideration, including solutions that would provide universal access. Barrier-specific solutions, as well as alternative ways to improve access overall, were addressed and included both physical changes and/or the addition of alternate format methods. In some cases, programmatic alternatives needed to be examined because it was not always possible to eliminate physical barriers due to historic designations, environmental concerns, topography, or sensitive cultural and natural resources. Therefore, a full range of programmatic alternatives was considered that would provide access to the key experience for as many visitors as possible. All field results, including collected data, findings, preliminary options, and conceptual site plans, are organized by park area and formalized with recommendations in the transition plan.

TRANSITION PLAN

The following graphic illustrates the primary steps taken in developing the Minidoka National Historic Site transition plan. Each step is further described in the following text.



Step 5: Draft Transition Plan

The next step of the process was drafting the transition plan and implementation strategy. Developing an implementation strategy can be complex because of a large range of coordination efforts associated with scheduling accessibility improvements. All improvement efforts need to consider park activities and operational requirements. The plan recommends accessibility improvements, identifies improvement time frames, and identifies responsible parties for such actions.

Implementation time frames are based on the park's ability to complete the improvements within normal scheduling of park operations and planned projects. Time frames are categorized as follows:

1) **Immediate (0–1 year):** Improvements that are easy, quick, and inexpensive to fix internally. It does not require supplemental NPS project funding.

immediate

2) **Short-term (1–3 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.

short-term

3) **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 annual servicewide budget call. For those projects requiring supplemental NPS project funding, the park will submit a request in the next budget call. Improvements will be scheduled dependent upon the year funding is received. If the improvement does not require supplemental NPS project funding, park staff will continue the elimination of the barrier internally.

mid-term

4) **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.

long-term

Step 6: Conduct Public Involvement

Public involvement occurs at the draft stage of the transition plan; however, it is recommended that at the beginning of the SETP process parks initiate public outreach efforts with organizations representing people with disabilities. The draft plan will be released for a 30-day period to solicit input from the public, including people with disabilities and organizations that represent people with disabilities, to provide comments and thoughts on whether the document represents a reasonable review of the park's barriers and a feasible and appropriate strategy for overcoming the barriers.

Step 7: Finalize Transition Plan

After the comment period has closed, the park will analyze all comments to determine if any revisions to the plan are necessary. Those revisions will be made before the implementation strategy is finalized. Once finalized, a notification will be sent to the public to announce the plan's availability.

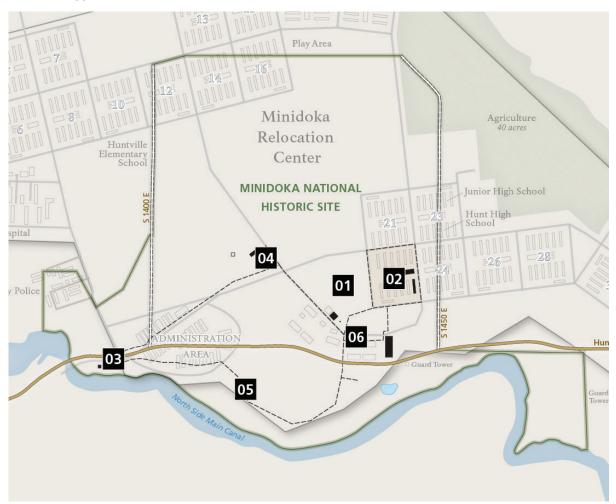
IMPLEMENTATION STRATEGY FOR MINIDOKA NATIONAL HISTORIC SITE

PARK AREAS ASSESSED

All key park experiences at Minidoka National Historic Site are represented within the park areas assessed. Park areas not included in the park area list will be upgraded to current code requirements when facility alteration and/or new construction is planned. Each park area identified for assessment is addressed during the implementation strategy exercise. All park areas assessed are listed in alphabetical order and identified in the associated map below.

- 1. Ballfield Area
- 2. Block 22
- 3. Camp Entrance Area
- 4. Herrmann House/Fire Station #1 Area

- 5. Interpretive Trail
- 6. Warehouse Area



IMPLEMENTATION STRATEGY FOR PARK AREAS ASSESSED

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. The Uniform Federal Accessibility Standards (UFAS) and the Architectural Barriers Act Accessibility Standards (ABAAS) were adopted for federal facilities in 1984 and 2006, respectively. Subsequently in 2011, standards for recreational facilities were incorporated into ABAAS as chapter 10.

Dependent upon the date of a building's construction or alteration, different design standards apply. In conducting the transition plan facility assessments, the 2011 ABAAS standards were used as the on-site assessments. Although a barrier may be identified by the current assessment for improvement, facilities constructed pre-1984, or between 1984 and 2011, are only required to be in compliance with the standard in place at the time of construction and/or alteration. Therefore, they 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.

Recommended improvements for park policies, practices, communication and training are included. Park policies are adopted by the park and are those defined courses of action for reaching a desired outcome. Park practices are those habitual and/or customary performances or operations park staff employs for reaching a desired outcome. Communication and training strategies help park staff keep informed on how to best deliver services, activities, and programs to visitors with disabilities in the most appropriate and accessible formats.

This document does not include strategies for transitioning employee workspaces to be accessible. In the event an employee with a disability is hired by Minidoka National Historic Site, the supervisor and employee will discuss the employee's needs. The supervisor will then determine what accommodations are reasonable within the given work environment and determine a plan of action to meet those needs.

For each park area, site plans illustrate existing conditions and recommended improvements. During the implementation phase, reassessment of the project site conditions and consultation with the Architectural Barriers Act Accessibility Standards is necessary to ensure that specific design and programmatic solutions are addressed correctly. Assistance is available at the Denver Service Center and through the Pacific West Region Accessibility Coordinator.

BALLFIELD AREA

Site Plan



Implementation Strategy

The ballfield is connected to three key park experiences: reflect on how the Nikkei community's incarceration experience affected their ties to the communities they left behind; learn about daily life for prisoners of Minidoka; and view historic structures and the cultural landscape. Located slightly off the interpretive trail, the field is a restoration of one of fourteen baseball fields originally located throughout the camp. The cultural landscape includes the field, two sets of bleachers and player benches, a scoreboard, and a backstop. It is generally flat, although accessibility could be improved with a defined path to the field, defined areas next to the bleachers for a wheelchair user to sit during scrimmages and games, and additional interpretation.

The following improvements to this park area are planned:

01 Hiking Trail

1) Improve the trail to the ballfield to be firm and stable, 36" minimum in width, with an 8.3% maximum running slope (short segments are allowed to have higher running slopes) and a 2% maximum cross slope (5% if necessary for drainage).

mid-term

O2 Accessible Route and Walking Surfaces

1) Improve the route from the trail to the bleachers. It shall be firm, stable, and slip resistant at 36" minimum in width with a 5% maximum running slope and a 2% maximum cross slope.

short-term

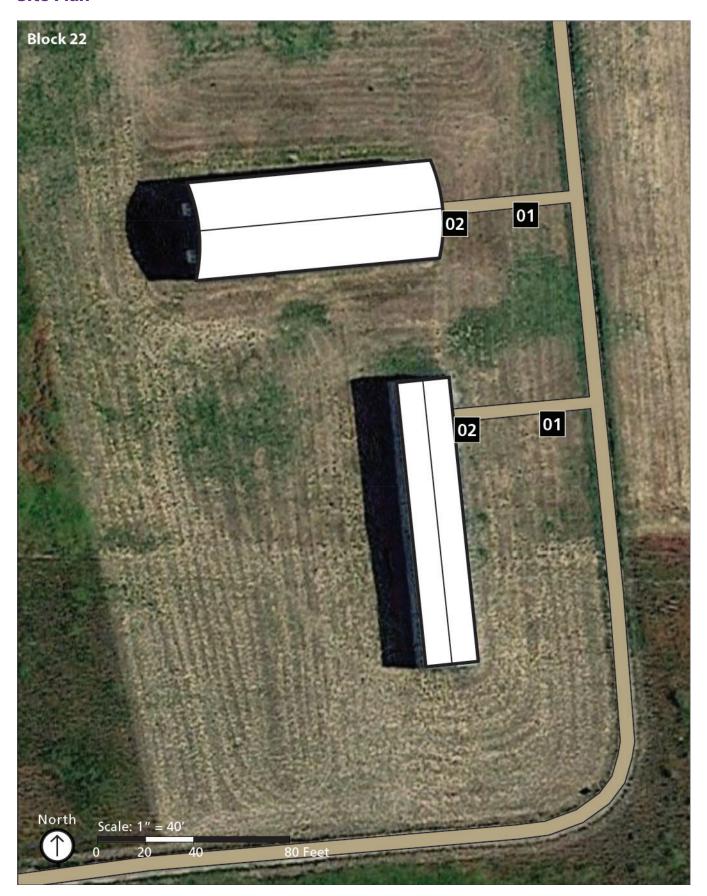
03 Bleachers

1) Provide a 36" by 48" minimum clear ground space next to the bleachers at a 2% slope in all directions. During events, identify the location for wheelchair users.

mid-term

BLOCK 22

Site Plan



Implementation Strategy

Block 22 is connected to all six key park experiences: understand the role that "race prejudice, war hysteria, and a failure of political leadership" played; empathize with those imprisoned and their sense of abandonment by their country; reflect on how the Nikkei community's incarceration experience affected their ties to the communities they left behind; learn about daily life for prisoners of Minidoka; view historic structures and the cultural landscape; and learn about the U.S. government's decades-long redress process. Located off the interpretive trail, the area contains a historic mess hall and barracks. The buildings have interior exhibits interpreting the people that used the buildings during the war and the activities that occurred within them. There are no defined paths leading to either building and both have steps to access the front entrances. Installing a ramp to each building, possibly to side entrances to protect the historic façades, would allow all visitors to explore the buildings and exhibits and to feel the powerful weight of the stories contained within. An audio tour, potentially connected to the phone app, would also enrich interpretation of the buildings and area.

The following improvements to this park area are planned:

O1 Accessible Route and Walking Surfaces

- 1) Provide a firm, stable, and slip resistant route from the interpretive trail to the historic barracks and mess hall buildings, 36" minimum in width at a 5% maximum running slope and a 2% maximum cross slope.
- 2) Provide an accessible entrance into historic buildings. As feasible, construct a ramp to the building entrance or to an alternative entrance if needed. It shall have an 8.3% maximum running slope with handrails on both sides, handrail extensions at the top and bottom of ramp runs, and appropriate level landings and turning spaces.
- 3) Until an accessible entrance is constructed at each building, provide alternative programming to interpret buildings and exhibits.

mid-term

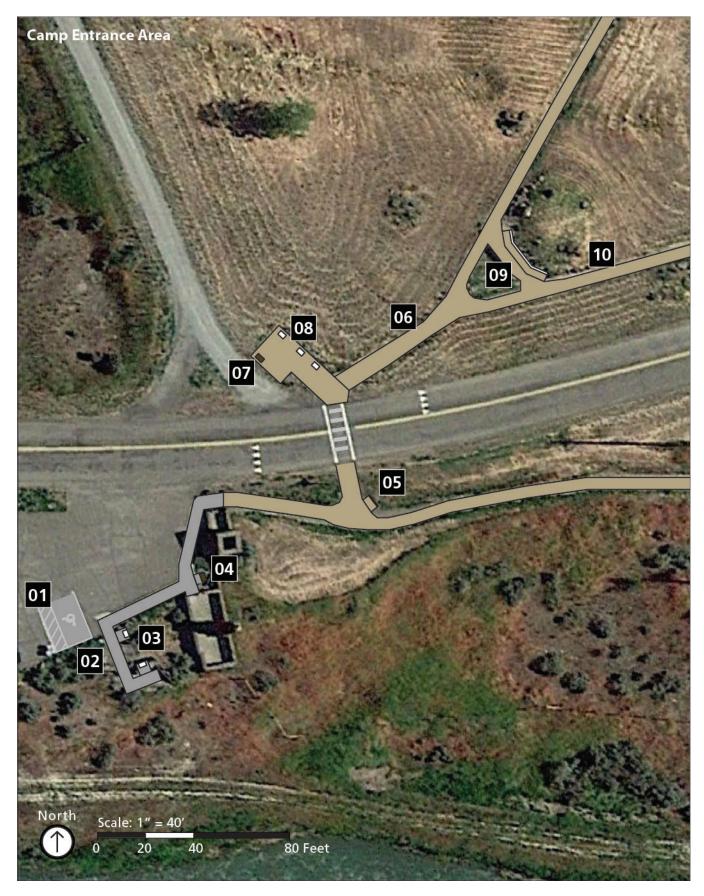
02 Doors

- 1) Assess and improve as needed the maneuvering clearance at each door. Ensure that doorway openings are at least 32 " minimum in width.
- 2) As feasible, replace each door latch so it is operable with a closed fist.

long-term

CAMP ENTRANCE AREA

Site Plan



Implementation Strategy

The Camp Entrance Area is connected to all six key park experiences: understand the role that "race prejudice, war hysteria, and a failure of political leadership" played; empathize with those imprisoned and their sense of abandonment by their country; reflect on how the Nikkei community's incarceration experience affected their ties to the communities they left behind; learn about daily life for prisoners of Minidoka; view historic structures and the cultural landscape; and learn about the U.S. government's decades-long redress process. The iconic area is the first view for many visitors of the park. The Camp Entrance introduces visitors to the story of the site and its past inhabitants and is the launching point for the 1.6-mile-long interpretive trail. The area is generally level and contains Guard Station stone ruins, a reconstructed guard tower, interpretive waysides, benches, and the poignant Honor Roll listing the names of those previously incarcerated. It is manageable for visitors with mobility impairments, although improvements could be made to stabilize the routes and enhance parking. Programmatic improvements would be especially valued in the area, such as improving waysides, adding a tactile map of the site, and providing alternative means to browse the names on the Honor Roll.

The following improvements to this park area are planned:

01 Car Parking

1) Improve the van-accessible stall to be 11' minimum in width with a 5' minimum width access aisle or 8' minimum in width with an 8' minimum width access aisle.

short-term

02 Brochure Box

1) Move the brochure box to a location along the accessible route. Provide a firm and stable surface at the brochure box, 30" by 48" minimum for a forward or parallel approach and a 2% maximum slope in all directions. The brochure box must also be operable with a closed fist and within reach range between 15" and 48" above the ground.

short-term

03 Interpretive Waysides

- 1) Provide level landings in front of all waysides or relocate them to accessible locations. Landings shall be firm and stable and 30" by 48" minimum from a forward approach at a 2% maximum slope in all directions.
- 2) Replace the speaker in the audio stand.

3) As a best practice, improve or replace waysides to use sans serif fonts, no italics, no all caps, 24-point minimum font, and high-contrast images and text.

mid-term

04 Benches

1) As a best practice, improve accessible benches to include armrests and backrests. Ensure accessible benches are distributed throughout the area.

mid-term

2) Provide a clear ground space next to each accessible bench, 36" by 48" minimum with a 2% maximum slope in all directions. The clear ground space must adjoin and may not overlap the accessible route. In areas where the view from the bench is significant, consider providing a companion seating space adjacent to the bench.

short-term

05 Trailhead Signage

1) Provide a level landing in front of the trailhead sign. The landing shall be firm, stable, and slip resistant at 30" by 48" minimum from a forward approach at a 2% maximum slope in all directions.

short-term

2) Provide signage that details trail conditions at the trailhead, including trail length, surface type, typical and maximum running and cross slopes, and typical and minimum tread width. Other recommended information includes providing a description of potential obstacles, distances to experiences and/or features, and graphics such as a cross-section that demonstrates slope conditions. As a best practice, maps should use multiple approaches such as tactile elements to serve additional visitors.

mid-term

O6 Accessible Route and Walking Surfaces

1) As feasible and so as not to negatively impact the cultural significance of the historic path, improve the route to be firm, stable, and slip resistant, 36" minimum in width at a 5% maximum running slope and a 2% maximum cross slope. Improve the gravel between stones with a binding agent.

07 Benches (at Honor Roll)

1) As a best practice, improve accessible benches to include armrests and backrests. Ensure accessible benches are distributed throughout the area.

mid-term

2) Provide a clear ground space next to each accessible bench, 36" by 48" minimum with a 2% maximum slope in all directions. The clear ground space must adjoin and may not overlap the accessible route. In this location with the view of the Honor Roll, consider providing a companion seating space adjacent to the accessible bench.

short-term

08 Interpretive Waysides (at Honor Roll)

1) Add a level forward approach to the wayside exhibits. Surface shall be firm and stable, 30" by 48" minimum from a forward approach at a 2% maximum slope in all directions.

short-term

2) As a best practice, improve or replace waysides to use sans serif fonts, no italics, no all caps, 24-point minimum font, and high-contrast images and text.

mid-term

09 Honor Roll

1) Park to provide a binder of names. Ensure that the list of names is available in alternative formats such as large print and braille, and on the park website and at the visitor center information desk.

short-term

10 Hiking Trail

1) As feasible and so as not to negatively impact the cultural significance of the interpretive trail, improve the trail to be firm and stable by adding a binding agent to the gravel surface. Reapply regularly to maintain the accessible surface.

HERRMANN HOUSE/FIRE STATION #1 AREA

Site Plan



Implementation Strategy

The Herrmann House/Fire Station #1 Area is connected to five key park experiences: understand the role that "race prejudice, war hysteria, and a failure of political leadership" played; reflect on how the Nikkei community's incarceration experience affected their ties to the communities they left behind; learn about daily life for prisoners of Minidoka; view historic structures and the cultural landscape; and learn about the U.S. government's decades-long redress process. The Herrmann House acts as a temporary visitor center for the park while the former warehouse is rehabilitated into a permanent visitor contact station. The house is small and its conversion incorporated some accessibility as feasible. Small improvements are still possible to further support visitors with disabilities. Braille signage, improved restrooms, and tactile exhibits would provide a more welcoming, educational environment while the area is in transition.

The following improvements to this park area are planned:

01 Car Parking

- 1) Improve the van-accessible stall to be 11' minimum in width with a 5' minimum width access aisle or 8' minimum in width with an 8' minimum with access aisle. The stall shall be firm, stable, and slip resistant at a 2% maximum slope in all directions.
- 2) Provide "van accessible" designation on the van-accessible stall.

short-term

O2 Accessible Route

1) Improve the ramp to the visitor center to have an 8.3% maximum running slope.

mid-term

03 Portable Restroom

- 1) Replace the portable restroom with a fully accessible unit.
- 2) Install braille signage to the latch side of the restroom door. The bottom of the tactile characters shall be 48" minimum above the ground and the tops 60" minimum above the ground. Ensure there is an 18" by 18" minimum clear space underneath the braille sign.

The following services, activities, and programs are located inside the Herrmann House:

Accessible Route

1) As feasible, widen the accessible route to be 36" minimum in width (32" width is allowed for a maximum distance of 24"). Ensure turning spaces are provided 60" by 60" minimum or an appropriately sized "T" shaped turning space.

mid-term

Information Desk

1) As feasible, improve the information desk to provide a parallel approach with a 36" minimum width section 36" maximum in height or a forward approach with a 30" minimum width section 36" maximum in height. If a forward approach, provide 27" minimum knee clearance and 9" minimum toe clearance.

short-term

Restrooms

1) Cover water supply and drainpipes under lavatories with insulation or reconfigured to prevent contact.

short-term

2) Provide firm, stable, and slip-resistant landing spaces 60" by 60" minimum in front of each sink.

mid-term

Fire Extinguisher

1) Relocate the fire extinguisher to an accessible location with a 30" by 48" minimum clear space. It shall be operable between 15" and 48" above the floor.

immediate

Interior Signage

1) Doors at building exits shall be identified by tactile signs. Provide braille signage on the latch side of the exit door. The bottom of the tactile characters shall be 48" minimum above the ground and the tops 60" minimum above the ground. Ensure there is an 18" by 18" minimum clear space underneath the braille sign.

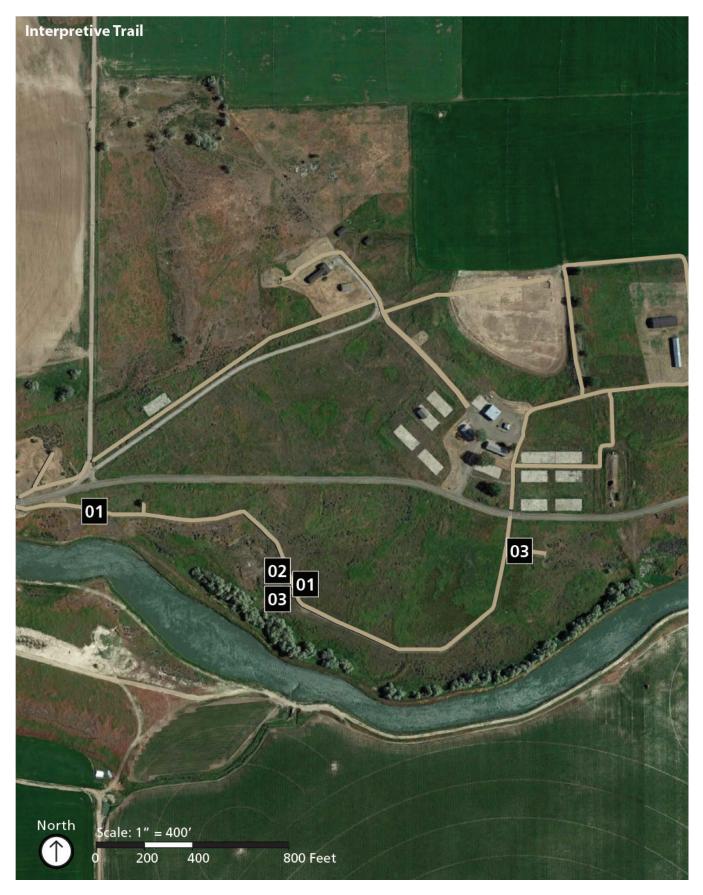
The following services, activities, and programs are located inside the **building adjacent to the Herrmann House:**

Exhibits

- 1) As a best practice, improve or replace exhibits to use sans serif fonts, no italics, no all caps, 24-point minimum font, and high-contrast images and text.
- 2) Consider adding tactile exhibits such as a map showing the buildings, significant areas, and their locations in the park.

INTERPRETIVE TRAIL

Site Plan



Implementation Strategy

The interpretive trail is connected to all six key park experiences: understand the role that "race prejudice, war hysteria, and a failure of political leadership" played; empathize with those imprisoned and their sense of abandonment by their country; reflect on how the Nikkei community's incarceration experience affected their ties to the communities they left behind; learn about daily life for prisoners of Minidoka; view historic structures and the cultural landscape; and learn about the U.S. government's decades-long redress process. The 1.6-mile trail leads visitors throughout the park and through 23 waysides and multiple places of interest and tells the story of the people, historic structures, and cultural landscape preserved at the site. The trail was constructed in 2011-2012 and is accessible along most of its length. Some short, steep portions and occasional loose, sandy soils could be improved by regularly maintaining the surface of the trail and ensuring proper resting spaces are provided in steep locations. Adding appropriate clear ground spaces at benches, improving exhibit panels, and providing an audio tour would improve the experience for all visitors.

The following improvements to this park area are planned:

01 Hiking Trail

1) As feasible, improve the interpretive trail to have running slopes that do not exceed 12%. Where required, ensure resting intervals are provided and are 60" by 36" minimum. On trail segments less than 60" wide, provide passing spaces of 60" minimum at intervals of at least 1,000'.

mid-term

02 Benches

1) Provide a clear ground space next to each accessible bench, 36" by 48" minimum with a 2% maximum slope in all directions. The clear ground space must adjoin and may not overlap the accessible route. In areas where the view from the bench is significant, consider providing a companion seating space adjacent to the bench.

short-term

2) As best practice, improve accessible benches to include armrests and backrests. Ensure accessible benches are distributed throughout the area.

mid-term

03 Interpretive Waysides

- 1) Provide level landings in front of all waysides or relocate them to accessible locations. Landings shall be firm and stable surfaces and 30" by 48" minimum from a forward approach at a 2% maximum slope in all directions.
- 2) For waysides with audio exhibits, replace the speakers as needed.

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WAREHOUSE AREA

Site Plan



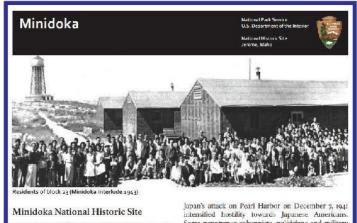
Implementation Strategy

The Warehouse Area is connected to four key park experiences: reflect on how the Nikkei community's incarceration experience affected their ties to the communities they left behind; learn about daily life for prisoners of Minidoka; view historic structures and the cultural landscape; and learn about the U.S. government's decades-long redress process. The area is currently in a transition phase. At the time of the assessment (May 2018) some of the buildings had recently been torn down, and the fate of others was up in the air. One of the existing warehouses was being rehabilitated and repurposed into a new visitor contact station, thereby opening up the Herrmann House for other uses.

Prior to the workshop, the DSC team reviewed park plans for the new visitor contact station and found that physical accessibility was sufficiently addressed. While touring other areas during the workshop, the assessment team visited the Warehouse Area and listened as park staff described how the ideas presented in the plans were being implemented. The assessment team recommended a few things to think about (e.g., incorporating exhibit recommendations from the Herrmann House into the new building, adding interpretive media for visitors who are unable to walk the Interpretive Trail) during and after construction to ensure that the area is accessible to and provides a great experience for all visitors.

MINIDOKA NATIONAL HISTORIC SITE POLICIES, PRACTICES, COMMUNICATION, AND TRAINING

Park Features



As the 385th unit of the National Park System, Minidokn was established in 2001 to commemorate the hardships and sacrifices of Iganese Americans interned there during World War II. Also known as 'Hunt Camp', Minidoka Relocation Center was a 33,000-acre site with over 600 buildings and a total population of about 13,000 internees from Alaska, Washington, and Oregon. The Center was in operation from August 1942 until Orgober 1045.

E: 02 /e Order 9066

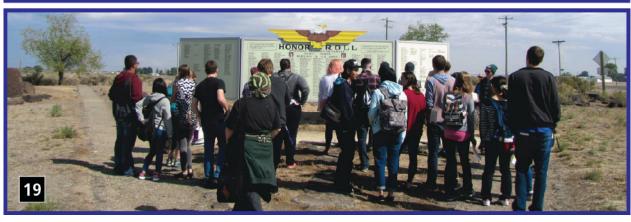
In the 1800s, many emigrants from Japan crossed

Japan's attack on Pearl Harbor on December 7, 1941 intensified hostility towards Japanese Americans. Some newspaper columnists, politicians and military personnel treated all people of Japanese ancestry as potential spics and saboteurs. As warrime hysteria mounted, President Franklin D. Roosevelt signed Executive Order 9066 on February 19, 1942.

Executive Order 9066 gave the Secretary of War and the military commanders the power to exclude any persons from designated areas in order to secure nation defense, objectives against saborage, and explonage. Although the order could be applied to all people, the focus was on the persons of Japanese, German, and Italian decent. Due to public pressure the order was







Implementation Strategy

Park policies and practices are specific to the park unit and provide guidance for reaching desired outcomes. Park policies are defined courses of action adopted by the park, while park practices are those habitual and/or customary performances of operations that the park employs.

Posting and Publications

01 Accessibility Flyers Posted in Common Areas

1) Place posters in common areas of staff and visitor buildings that provide accessibility-related information, including requirements, contacts, questions, and complaints.

immediate

02 Publications

- 1) Provide audio described publications.
- 2) Provide large-print format publications. Use a minimum readable typeface at 18-point font. Align flush left and rag right. Avoid hyphens. Use black or white type color and avoid red text. Avoid italicized and underlined text. Provide graphics with at least 70% contrast.
- 3) Add accessibility information in all publications, as they relate to services, activities, and programs.

mid-term

Staff Training and Park Protocols

03 Accessibility Awareness Training

1) Provide ongoing accessibility awareness training for all staff, including permanent and nonpermanent employees.

short-term

04 Accessible Facilities and Maintenance Training

1) Provide ongoing training for maintenance staff on planning, maintaining and constructing accessible facilities, including, but not limited to, restrooms, walks and trails, door pressure requirements, assistive devices, accessible routes, and universal design principles.

short-term

05 Accessibility for Project Managers Training

1) Provide ongoing training for project managers to address project accessibility requirements, (e.g., entering accessibility projects in Project Management Information System (PMIS), understanding universal design principles, and overseeing quality control of projects and designs).

short-term

O6 Accessible Interpretive Training

1) Provide ongoing training for the interpretation and education division. Training may include, but is not limited to, how to evaluate programs for accessibility compliance; which websites offer more information; information about service animals; information about Other Power-Driven Mobility Devices (OPDMDs); how and when to offer live audio description programming; accessibility specifications for interpretive tactile models and maps; what assistive technologies are available; universal design principles; visitor services and communication about accessibility. It is also important to provide regular and ongoing visitor information and interpretive staff training in use of, distribution, and procedures for wheelchairs and assistive technology—assistive listening devices, T-coil hearing loops, neck loops, and text telephone machines.

short-term

07 Communication with Law Enforcement

1) Provide a standard operation procedure that outlines methods for law enforcement to communicate with a person with a disability.

short-term

08 Emergency Preparedness

1) Develop, distribute, and practice standard operating procedures for assisting people with disabilities in the case of an emergency.

short-term

09 Movable Seating

1) Develop and distribute standard operating procedures for movable cubicles and conference rooms, so there is adequate clear space and accessible routes to all elements in a room or building. Post a map in an area with accessible layout and instructions for use of the space.

2) Develop and distribute standard operating procedures for movable seating arrangements and moving things to create an accessible route and maintain integrated accessible seating. Post a map in an area with accessible layout and instructions for use of the space.

short-term

10 Other Power-Driven Mobility Devices (OPDMDs)

1) Provide guidance outlining use of OPDMDs within the park.

short-term

Audio and Visual Programs

11 Assistive Listening Devices (ALDs)

- 1) Purchase assistive listening transmitters and devices. Provide these devices at visitor centers, educational programs, and guided tours with audio components.
- 2) Develop and distribute standard operating procedures or guidance for checking out and returning assistive listening devices.
- 3) Develop and distribute standard operating procedures or guidance describing protocol for pre -and post-inspection of the devices and for cleaning and maintaining all devices.
- 4) Provide signage and information where programs are offered stating device availability. Verbally inform visitors and program participants that auxiliary aids are available. Add information to all publications and communications stating that assistive listening devices are available and provide information on how they can be attained.

short-term

12 Live Audio Description

1) Provide live audio descriptions on guided interpretive tours when needed.

mid-term

13 Open Captioning and Audio Description

1) Provide audio description of all images shown on the videos.

mid-term

14 T-Coil Hearing Loops or Neck Loops

- 1) Purchase T-coil hearing loops and neck loops. Inform visitors and program participants that auxiliary aids are available and provide information on check-out procedures. Post signage in appropriate locations and in all publications specifying availability of services.
- 2) Develop and distribute standard operating procedure or guidance for checking out and returning T-coil hearing loops and neck loops.
- 3) Develop and distribute standard operating procedures or guidance for pre-and post-inspection of T-coil hearing loops and neck loops and cleaning and maintenance of all devices.

mid-term

Visitor Information

15 Communication

1) Provide park e-mail address and telephone number on the park's website and in publications for questions: miin_information@nps.gov.

long-term

2) Develop an accessibility guide for Minidoka National Historic Site that outlines accessible services, activities, and programs.

mid-term

16 Outreach

- 1) Conduct outreach via social media (Pinterest, Facebook, Snapchat, Twitter, etc.) to describe accessible programs, services, and activities available at the park.
- 2) Conduct outreach via traditional media and other advertising methods to describe accessible programs, services, and activities available at the park.
- 3) Contact groups with disabilities to inform them about the accessible programs, services, and activities that have become available at the park as solutions are implemented.
- 4) Outreach to and engage groups with disabilities to determine appropriate ways to involve them in park accessibility improvement projects as they occur (caseby-case basis).

mid-term

17 Signage

1) Provide signage at visitor center that states availability of accessible alternative formats.

mid-term

Tours, Programs, and Special Events

Tours (Guided and Self-Guided), Educational Programs, and Special 18 **Events**

- 1) Upon request, provide alternative formats such as trail information in large print; audio descriptions for tours; educational programs; or special events. Provide alternative formats on park website and in publications at visitor center.
- 2) Provide information on the physical conditions of the tour, education program, or special event (e.g., number of steps, slopes, other barriers that exist, etc.) on-site, in a publication and/or on a website.

3) Provide designated stopping points or resting areas for the tour, education program, or special event, with 2% maximum cross and running slopes, firm and stable surfaces, and a minimum 30" by 48" clear space.

long-term

19 **Sign Language Interpreters**

- 1) Develop the process for requesting sign language interpreters. Provide sign language interpreters within five days of request.
- 2) Develop and distribute standard operating procedures for contacting and scheduling sign language interpreters.

20 Special Events

1) Provide a system for people to call in and request a sign language interpreter within five days of service. Provide assistive listening devices and a T-coil or neck loop system. Post signage indicating devices and systems are available for special events. Provide large print of any handouts or waivers being provided.

short-term

- 2) Provide information on how people can contact the park for accommodations for special events, and release event announcements in a variety of accessible methods (e.g., large-print flyers, electronic accessible PDFs, etc.) mid-term
- 3) Develop and distribute a standard operating procedure on how to post accessibility information and how to request accommodations on event announcements.

short-term

Concessions and Partnerships

Park Partner, Lessee, and Concessionaire Services, Activities, and Programs

- 1) Prepare a standard operating procedure for lessees and park partners about providing accessible programs, services, and activities within the park unit.
- 2) Develop and distribute a standard operating procedure for presentations provided by outside groups regarding accessibility and assistive listening devices.
- 3) Communicate with state partners to ensure that an accessibility assessment and a plan for implementing accessibility solutions is completed. The Architectural Barriers for Accessibility Standards does not apply to state partner lands; however, the Americans with Disabilities Act does. State requirements take precedence in these cases.
- 4) Architectural Barriers Act for Accessibility Standards applies to all lands funded by the federal government. Communicate with park partner and/or concessioners to ensure accessible services, activities, and programs are provided. The National Park Service will conduct an assessment, develop a transition plan, and address park partner concessioner services.

long-term

CONCLUSION

Minidoka National Historic Site is committed to providing all visitors the opportunity to connect with and learn about the park's unique natural, cultural, and recreational resources. Accessibility improvements identified in the Minidoka National Historic Site Self-Evaluation and Transition Plan 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 Minidoka National Historic Site will continue to work toward accommodating all park visitors while sustaining its legacy to preserve and protect resources related to the Minidoka War Relocation Center and to continue to interpret and educate visitors on the exclusion and unjust incarceration of Nikki during World War II.

The Self-Evaluation and Transition Plan for Minidoka National Historic Site 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 will be updated in this plan. The park will 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.

The primary goal of the transition plan is to define key park experiences and document modifications needed to provide independent program participation for the widest range of disabilities possible. As the park works towards its accessibility goals and makes the implementation strategy a reality, both physical and programmatic accessibility will improve across the breadth of key park experiences at Minidoka National Historic Site.

For visitors with mobility disabilities, access will be improved from the moment they enter the park. Facilities, as well as numerous programs, services, and activities the park offers will be more universally accessible. Experiences such as hiking along the Interpretive Trail, viewing historic structures and the cultural landscape, reflecting on the experience of the incarcerees, learning about war prejudice and the decades-long redress process, and learning about the human history and environment of the park will be enhanced.

Park programs will be created and delivered for all visitors, including visitors with mild to severe disabilities impacting their mobility, vision, hearing, and/or cognitive abilities. Ranger led walks/talks, visitor center exhibits, films, trail waysides, and all materials that interpret park resources to the public will be provided in formats that allow visitors with disabilities to participate fully. Some of those formats include, but are not limited to: large-print transcripts for printer materials, audio description for exhibits and films, assistive listening devices and sign language interpreters for ranger-led tours and programs, T-coil hearing loops for park films.

Over time, the results of this collective effort will make Minidoka National Historic Site a truly welcoming and accommodating place for all visitors and will provide equal opportunity to access the many places, resources, stories, and experiences the park has to offer.

APPENDIX A: ACCESSIBILITY LAWS, STANDARDS, GUIDELINES, AND NPS POLICIES APPLICABLE TO MINIDOKA NATIONAL HISTORIC SITE

As a national park, Minidoka National Historic Site 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 Minidoka National Historic Site.

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

http://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-aba-standards/guide-to-the-aba-standards

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.

Section 504 of the Rehabilitation Act of 1973

http://www.law.cornell.edu/cfr/text/43/17.550

To the extent that section 504 of the Rehabilitation Act of 1973 applies to departments and agencies of the federal government, the parks operated by the National Park Service are subject to the provisions of that statute. As will be discussed in the following text, 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 (PL 95-602) extends the scope of section 504 of the Rehabilitation Act of 1973 (PL 93-112) to include Executive Branch agencies of the federal government. As amended, section 504 states:

Section 504: No 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.

Section 508 of the Rehabilitation Act of 1973

http://www.section508.gov/

In 1998, Congress amended the Rehabilitation Act of 1973 to require federal agencies to make their electronic and information technology (EIT) 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 USC §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 discussed in the following sections to further your understanding about section 508 and how you can support implementation.

Accessibility Standards for Outdoor Developed Areas

http://www.access-board.gov/guidelines-and-standards/recreation-facilities/outdoor-developed-areas/final-guidelines-for-outdoor-developed-areas

Achieving accessibility in outdoor environments has long been a source of inquiry because of challenges and constraints posed by terrain, the degree of development, construction practices and materials, and other factors. The new provisions address access to trails, picnic and camping areas, viewing areas, beach access routes, and other components of outdoor developed areas on federal sites when newly built or altered. They also provide

exceptions for situations where terrain and other factors make compliance impracticable. In 2013, this final rule amended the Architectural Barriers Act Accessibility Guidelines by adding scoping and technical requirements for camping facilities, picnic facilities, viewing areas, trails, and beach access routes constructed or altered by or on behalf of federal agencies. The final rule ensures that these facilities are readily accessible to and usable by individuals with disabilities. The final rule applies to the following federal agencies and their components that administer outdoor areas developed for recreational purposes: Department of Agriculture (Forest Service); Department of Defense (Army Corps of Engineers); and Department of the Interior (Bureau of Land Management, Bureau of Reclamation, Fish and Wildlife Service, National Park Service). The final rule also applies to nonfederal entities that construct or alter recreation facilities on federal land on behalf of the federal agencies pursuant to a concession contract, partnership agreement, or similar arrangement.

Accessibility Standards for Shared Use Paths

http://www.access-board.gov/guidelines-and-standards/streets-sidewalks/shared-use-paths

Shared use paths provide a means of off-road transportation and recreation for various users, including pedestrians, bicyclists, skaters, and others, including people with disabilities. In its rulemaking on public rights-of-way and on trails and other outdoor developed areas, comments from the public urged the board to address access to shared use paths because they are distinct from sidewalks and trails. Shared-use paths, unlike most sidewalks, are physically separated from streets by an open space or barrier. They also differ from trails because they are designed not just for recreation purposes but for transportation as well.

In response, the board is supplementing its rulemaking on public rights-of-way to also cover shared-use paths. The proposed rights-of-way guidelines, which address access to sidewalks, streets, and other pedestrian facilities, provide requirements for pedestrian access routes, including specifications for route width, grade, cross slope, surfaces, and other features. The board proposes to apply these and other relevant requirements to shared-use paths as well. This supplementary rulemaking also would add provisions tailored to shared-use paths into the rights-of-way guidelines.

Draft Accessibility Standards for Public Rights-of-Way

http://www.access-board.gov/guidelines-and-standards/streets-sidewalks/public-rights-of-way

Sidewalks, street crossings, and other elements in the public right-of-way can pose challenges to accessibility. The United States 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 is developing new guidelines for public rights-of-way that will address various issues, including access for blind pedestrians at street crossings, wheelchair access to onstreet parking, and various constraints posed by space limitations, roadway design practices, slope, and terrain. The new guidelines 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.

Effective Communication

http://www.ada.gov/effective-comm.htm

People who have vision, hearing, or speech disabilities ("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 ADA requires 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 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.

Reasonable Accommodations

http://www.opm.gov/policy-data-oversight/disability-employment/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). For more information, see the Equal Employment Opportunity Commission's Enforcement Guidance: Reasonable Accommodation and Undue Hardship under the Americans with Disabilities Act (external link).

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 (external link) 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. To request reasonable accommodations:

- Look at the vacancy announcement.
- Work directly with person arranging the interviews.
- Contact the agency Selective Placement Program Coordinator.
- Contact the hiring manager and engage in an interactive process to clarify what the person needs and identify reasonable accommodations.
- Make an oral or written request; no special language is needed.

Other Power-Driven Mobility Devices

http://www.ada.gov/regs2010/ADAregs2010.htm

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 for use 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.

Service Animals

http://www.nps.gov/goga/planyourvisit/service-animals.htm

The following is excerpted from the Department of Justice and Americans with Disabilities Act Revised Regulations (effective 3/15/2011).

34.104 Definitions: Service animal means any dog [or miniature horse as outlined in the following text] 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, wellbeing, comfort, or companionship do not constitute work or tasks for the purposes of this definition.

- a. General. Generally, a public entity shall modify its policies, practices, or procedures to permit the use of a service animal by an individual with a disability.
- b. Exceptions. A public entity may ask an individual with a disability to remove a service animal from the premises if-
 - (1) The animal is out of control and the animal's handler does not take effective action to control it; or
 - (2) The animal is not housebroken.

- c. If an animal is properly excluded. If a public entity properly excludes a service animal under § 35.136(b), it shall give the individual with a disability the opportunity to participate in the service, program, or activity without having the service animal on the premises.
- d. Animal under handler's control. A service animal shall be under the control of its handler. A service animal shall have a harness, leash, or other tether, unless either the handler is unable because of a disability to use a harness, leash, or other tether, or the use of a harness, leash, or other tether would interfere with the service animal's safe, effective performance of work or tasks, in which case the service animal must be otherwise under the handler's control (e.g., voice control, signals, or other effective means).
- e. Care or supervision. A public entity is not responsible for the care or supervision of a service animal.
- f. Inquiries. A public entity shall not ask about the nature or extent of a person's disability, but may make two inquiries to determine whether an animal qualifies as a service animal. A public entity may ask if the animal is required because of a disability and what work or task the animal has been trained to perform. A public entity shall not require documentation, such as proof that the animal has been certified, trained, or licensed as a service animal. Generally, a public entity may not make these inquiries about a service animal when it is readily apparent that an animal is trained to do work or perform tasks for an individual with a disability (e.g., the dog is observed guiding an individual who is blind or has low vision, pulling a person's wheelchair, or providing assistance with stability or balance to an individual with an observable mobility disability).
- g. Access to areas of a public entity. Individuals with disabilities shall be permitted to be accompanied by their service animals in all areas of a public entity's facilities where members of the public, participants in services, programs or activities, or invitees, as relevant, are allowed to go.
- h. Surcharges. A public entity shall not ask or require an individual with a disability to pay a surcharge, even if people accompanied by pets are required to pay fees, or to comply with other requirements generally not applicable to people without pets. If a public entity normally charges individuals for the damage they cause, an individual with a disability may be charged for damage caused by his or her service animal.

i. Miniature horses.

- (1) Reasonable modifications. A public entity shall make reasonable modifications in policies, practices, or procedures to permit the use of a miniature horse by an individual with a disability if the miniature horse has been individually trained to do work or perform tasks for the benefit of the individual with a disability.
- (2) Assessment factors. In determining whether reasonable modifications in policies, practices, or procedures can be made to

allow a miniature horse into a specific facility, a public entity shall consider-

- i. The type, size, and weight of the miniature horse and whether the facility can accommodate these features;
- ii. Whether the handler has sufficient control of the miniature horse;
- iii. Whether the miniature horse is housebroken; and
- iv. Whether the miniature horse's presence in a specific facility compromises legitimate safety requirements that are necessary for safe operation.
- (C) Other requirements. Paragraphs 35.136 (c) through (h) of this section, which apply to service animals, shall also apply to miniature horses.

Section 17.549 Program Accessibility: Discrimination Prohibited

http://www.law.cornell.edu/cfr/text/43/17.549

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.

Section 17.550 Program Accessibility: Existing Facilities

http://www.law.cornell.edu/cfr/text/43/17.550

- **(a) General.** The agency 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 paragraph does not:
 - (1) Necessarily require the agency to make each of its existing facilities or every part of a facility accessible to and usable by people with disabilities;
 - (2) In the case of historic preservation programs, require the agency to take any action that would result in a substantial impairment of significant historic features of an historic property; or
 - (3) 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. In those circumstances where agency personnel believe that the proposed action would fundamentally alter the program or activity or would result in undue financial and administrative burdens, the agency has the burden of proving that compliance with §17.550(a) would result in such an

alteration or burdens. The decision that compliance would result in such alteration or burdens must be made by the agency head or his or her designee after considering all agency resources available for use in the funding and operation of the conducted program or activity, and must be accompanied by a written statement of the reasons for reaching that conclusion. If an action would result in such an alteration or such burdens, the agency shall take any other action that would not result in such an alteration or such burdens but would nevertheless ensure that handicapped persons receive the benefits and services of the program or activity.

(b) 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 USC 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.

Section 17.551 Program Accessibility: New Construction and Alterations

http://www.law.cornell.edu/cfr/text/43/17.551

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 USC 4151–4157) as established in 41 CFR 101 – 19.600 to 101 – 19.607 apply to buildings covered by this section.

NATIONAL PARK SERVICE DIRECTOR'S ORDERS AND MANAGEMENT POLICIES

A policy is a definite course of action adopted and pursed 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

http://www.nps.gov/policy/DOrders/DOrder16a.html

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, NPS 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.

Director's Order 42

http://www.nps.gov/policy/DOrders/DOrder42.html

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)
- 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

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

http://www.nps.gov/policy/mp/policies.html

All practicable efforts will be made to make NPS 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 the filing of an official disability right complain under the departmental regulations cited above.

GUIDELINES

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

Programmatic Accessibility Guidelines for National Park Service Interpretive Media

http://www.nps.gov/hfc/accessibility/

The "Programmatic Accessibility Guidelines for National Park Service Interpretive Media" is for media specialists, superintendents, and other NPS 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 interpretive media products have always provided to their fellow citizens.

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

Architectural Barriers Act Accessibility Standard (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 is 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 practice: 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.

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

Interdisciplinary design team: This team is composed of all the people involved in the workshop at the park unit, potentially including planning, design, and construction professionals; and interpretive, resource (natural and cultural), visitor safety, maintenance and accessibility specialists.

Key park experience: For the purpose of the Self-Evaluation and Transition Plan, key park experiences are those experiences that are iconic and essential for visitors to understand the purpose and significance of a given park unit. They are those experiences that are "musts" for all park visitors. Key park experiences can be identified through a consideration of park purpose, significance, interpretive themes, and those programs or activities highlighted in park communications.

Law: 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.

National Environmental Policy Act (NEPA) Requirements: NEPA defines 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. NEPA also requires federal agencies to involve the interested and affected public in the decision-making process.

Park area: A park area is the geographic location that is home to a single or multiple key park experience(s).

Park Asset Management Plan-Optimizer Banding (PAMP-OB): Provides a 5-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 service as a whole to manage the gap between what should be spent on facilities and what is actually being spent.

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

Park practice: 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.

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

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

Project Management Information System (PMIS) # (number): A unique Project ID Number 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 DSC planners and PWR staff. 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.

Recommended solution: The action to eliminate the identified barrier.

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

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

Standard: 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.

Time frame: Time frames for implementation of a recommended solution are primarily based on park's ability of the park to complete the improvements within normal scheduling of park operations and planned projects. They describe when staff will eliminate the barrier. Recommended solutions are divided into four time frames including: immediate, short-term, mid-term, and long-term.

APPENDIX C: CONTRIBUTORS

MINIDOKA NATIONAL HISTORIC SITE

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DENVER SERVICE CENTER

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BriAnna Weldon, Landscape Architect

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APPENDIX D: ACTIONS TAKEN BY THE PARK

Identification no. _____

Record this identification number in the implementation table where this action is identified. Use this template to track and document accessibility actions and accomplishments throughout the park.
Action Taken by Minidoka National Historic Site
Location: [Park Area]
Barrier:
Action taken:
Date work was completed:
PMIS Number(s) and Title(s):
Cost:
Photograph(s), sketches, or notes documenting completed work:
Submitted by:
Date:

APPENDIX E: GUIDANCE FOR PREPARING PMIS PACKAGES FOR ACCESSIBILITY IMPROVEMENTS

<u>Project description</u>: Clearly identify what improvements will be addressed as part of the package. Also identify the park location and facility for planned work. Reference work orders for all applicable types of planned work, e.g., deteriorated conditions to be improved (deferred maintenance), health and safety improvements, and code compliance issues such as accessibility improvements. Provide measurements of areas to be improved, e.g., square footage, lineal footage, etc.

Project justification: Reference the recently completed "Accessibility Self-Evaluation and Transition Plan" for your park and the implementation strategy dates. Identify the number of visitors affected and other beneficial aspects of the project. You can cite legal and management policies as noted below:

- The Architectural Barriers 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 addition, Section 504 of the Rehabilitation Act of 1973 requires covered entities to consider the accessibility of programs, services, and activities. In 2006, the Architectural Barriers Act Accessibility Standards (ABAAS) were adopted for federal facilities. Subsequently in 2011, standards for Recreational Facilities were added to ABAAS as Chapter 10.
- The National Park Service recommitted to making our parks and programs truly accessible to all in the "A Call to Action". The recently released "ALL IN! Accessibility in the National Park Service 2015-2020" included three goals for improved visitor access. This project addresses: Goal 1: Create a welcoming environment by increasing the ability of the National Park Service to serve visitors and staff with disabilities; Goal 2: Ensure that new facilities and programs are inclusive and accessible to people with disabilities; and Goal 3: Upgrade existing facilities, programs, and services to be accessible to people with disabilities.

<u>Potential eligible fund sources</u>: Accessibility projects are potentially eligible for a number of NPS fund sources and can be competitive in regard to the capital investment strategy. The following is a list of possible fund sources:

- 1. Repair/rehabilitation program—identify all work orders that pertain for deferred maintenance, code compliance, health and safety, etc.
- 2. Flex park base—accessibility is a NPS emphasis area for years 2015-2020.
- 3. Recreation fee 80% park—excellent fund source for accessibility as the project provides for visitor improvements. This should be a top choice for Fee80 parks.
- 4. Recreation fee 20% park—excellent fund source for accessibility as the project provides for visitor improvements.
- 5. Concession/permitted facilities—consider these fund sources when the facility is included in a Concession contract or permit.

- 6. Regular cyclic maintenance—excellent fund source for replacement of picnic tables, grills, trash containers, etc.
- 7. Exhibit cyclic maintenance—excellent fund source for replacing non-compliant waysides, exhibits, etc.
- 8. FLHP—include accessibility improvements with parking lot, parking spaces, accessible routes, curb cuts, sidewalks, signage, etc. as part of road improvement projects where appropriate.
- 9. Line item construction (LIC) —if you have a project in the LIC program, ensure inclusion of all appropriate accessibility improvements.

PMIS packages: Conduct a search in PMIS for projects previously funded for accessibility.

APPENDIX F: TRAIL SUMMARY SHEETS

[NAME OF TRAIL]

Park Name	Minidoka National Historic Site	_	
Trail Name	[Name of trail]	_	
Segment	[Segment information]	_	
Туре	_	_	
Length	[Length information]	_	
Elevation Gain	[Elevation gain] file]	_	
Elevation Loss	[Elevation loss information]	_	
Trail Uses Allowed	_	_	
_	_	_	
_	_	_	
Trail Uses NOT Allowed	_	_	
_	_	_	
_	_	_	
Typical Grade	[%]	Max = [X%]	
Intermediate	_	_	
Maximum	_	_	
_	Standard Ramp Grade is [X%]	_	
Typical Cross Slope	[%]	Max = [X%]	
Intermediate	_	_	
Maximum	_	_	
Typical Tread Width	[X in (X cm)]	Min = [X in (X cm)]	
Intermediate	_	_	
Minimum	_	_	
Surface Type	[Surface Type]	_	
Surface Category	X % of Trail is [Surface Type]	X % of Trail is [Surface Type]	
_	X % of Trail is [Surface Type]	X % of Trail is [Surface Type]	
_	X % of Trail is [Surface Type]	_	
Firmness	Typical: X	Minimum: X	
Stability	Typical: X	Minimum: X	

Obstructions:

Туре:	Size (Height):	Remaining Tread:	Location:
X	X in (X cm)	X in (X cm)	X ft. (X m)
Χ	X in (X cm)	X in (X cm)	X ft. (X m)
X	X in (X cm)	X in (X cm)	X ft. (X m)

Warning: [Add notes from rtf file]

[Add notes from rtf file]

Signage created by Beneficial Designs Inc. from data collected by a Certified Trail Assessment Coordinator using the High Efficiency Trail Assessment Process (HETAP).

APPENDIX G: TRAIL ASSESSMENT PROTOCOL

References: Architectural Barrier Act Accessibility Standards (ABAAS)

- Chapter 2 Scoping Requirements: Section F247 Trails, Section F216.13 Trailhead Signs
- Chapter 10 Recreation Facilities, Section 1017 Trails, Section 1019 Condition for Exceptions

Background standards: The ABAAS trail accessibility requirements are included in "Chapter 2 Scoping Requirements" and "Chapter 10 Recreation Facilities." Refer to ABAAS for the complete standards prior to planning any trail work or conducting assessments; the following bullets highlight some pertinent sections of the standards in regard to conducting assessments:

- F216.13 Trailhead Signs. Where new trail information signs are provided at trailheads on newly constructed or altered trails designed for use by hikers or pedestrians, the signs shall comply with 1017.10.
- F247.1 General. Where a trail is designed for use by hikers or pedestrians and directly connects to a trailhead or another trail that substantially meets the requirements in 1017, the trail shall comply with 1017. A trail system may include a series of connecting trails. Only trails that directly connect to a trailhead or another trail that substantially meets the requirements in 1017 are required to comply with 1017.
- F247.1 Advisory Trails. Trails that have a designed use for hikers or pedestrians are required to comply with 1017. Trails that have a designed use for other than hikers or pedestrians are not required to comply with 1017.
- F247.2 Existing Trails. Where the original design, function, or purpose of an existing trail is changed and the altered portion of the trail directly connects to a trailhead or another trail that substantially meets the requirements in 1017, the altered portion of the trail shall comply with 1017.
- F247.4 Advisory Trail Facilities. Facilities are required to comply with F247.4 regardless of whether the trail complies with 1017. (Note: this includes camping facilities, picnic facilities, and viewing areas that must comply with appropriate standards.)
- F247.5 Outdoor Constructed Features. Where outdoor constructed features are provided on trails, other than within facilities specified in F247.4, at least 20 percent, but not less than one, of each type of outdoor constructed feature at each location shall comply with 1011.
- 1017.1 General. Trails shall comply with 1017.

- Exception 1. When an entity determines that a condition in 1019 (see below) does not permit full compliance with a specific provision in 1017 on a portion of a trail, the portion of the trail shall comply with the provision to the extent practicable.
- Exception 2. After applying Exception 1, when an entity determines that it is impracticable for the entire trail to comply with 1017, the trail shall not be required to comply with 1017.
- 1017.1 Advisory General Exception 2. An entity must apply Exception 1 before using Exception 2. The entity should consider the portions of the trail that can and cannot fully comply with the specific provisions in 1017 and the extent of compliance where full compliance cannot be achieved when determining whether it would be impracticable for the entire trail to comply with 1017. The determination is made on a case-by-case basis. Federal agencies must document the basis for their determination when using Exceptions 1 or 2 and must notify the Access Board when using Exception 2.
- 1019.1 General (Conditions for Exceptions). Exceptions to specific provisions in 1017 shall be permitted when an entity determines that any of the following conditions does not permit full compliance with the provision:
 - 1) Compliance is not practicable due to terrain.
 - 2) Compliance cannot be accomplished with the prevailing construction practices.
 - 3) Compliance would fundamentally alter the function or purpose of the facility or the setting.
 - 4) Compliance is limited or precluded by any of the following laws, or by decisions or opinions issued or agreements executed pursuant to any of the following laws:
 - Endangered Species Act (16 U.S.C. §§ 1531 et seq.);
 - National Environmental Policy Act (42 U.S.C. §§ 4321 et seq.);
 - o National Historic Preservation Act (16 U.S.C. §§ 470 et seq.);
 - o Wilderness Act (16 U.S.C. §§ 1131 et seq.); or
 - Other federal, state, or local law the purpose of which is to preserve threatened or endangered species; the environment; or archaeological, cultural, historical, or other significant natural features.
- 1019.1 Clarification. Entities should consider all design options before using the exceptions. On trails, the exceptions apply only on the portion of the route where the condition applies. The trail is required to fully comply with the provisions in 1017, as applicable, at all other portions of the route where the conditions do not apply. There are additional exceptions that apply to an entire trail in 1017.1.

<u>Identifying trails for assessments</u>: Parks vary considerably in what key experiences are provided to visitors. A small historical park may have minimal or no trails but will have various walks and outdoor recreation access routes providing universal access. Some parks may have a few identified trails that they provide for universal access. While at other parks, the primary key experience for visitors may be the recreational trail system.

There are various sources of information to inform a decision on which trails to assess as part of the SETP process. The following sources can be researched and actions taken when identifying what trails are appropriate for assessment:

Sources:

- Trails that the park has identified in visitor information as being wheelchair accessible to visitors with disabilities.
- There are five classifications of trails defined within FMSS including:
 - Class 1 primitive/undeveloped
 - Class 2 simple/minor development
 - Class 3 developed/improved
 - Class 4 highly developed
 - o Class 5 fully developed.

Note: Class 4 and class 5 trails by definition have potential for universal access.

• FMSS trail listings in which parks have identified those trails that are ABA compliant and/or ABA designated trails. In December 2015, there were 98 trails in 32 parks identified in the region meeting those requirements.

Actions:

- Select a representative number of trails for assessment to provide visitors the
 maximum access to key park experiences. Eliminate those trails that are not
 practical because of terrain, cannot be altered to meet standards with prevailing
 construction practices, or exempt as a result of environmental or historical laws.
 For each trail, document within the park evaluation the reasons for elimination.
- Outdoor recreation facilities are often targeted in ABAAS to provide for access to at least 20% of the facilities but not less than one of each type of facility at each location. The 20% figure could be used as a general guide in identifying the number of trails to be assessed at various locations.
- Evaluate what is a reasonable expectation for making trail improvements in the 10year time-frame of the transition plan. Possibly four to six trail assessments would be the maximum scheduling capacity for trail improvements at a park within 10 years. Identify planned trail assessments and improvements for each time frame category.

Requirements for trail assessments: ABAAS Section 1017 provides the access standards for constructing and altering trails. These standards shall also be used for the assessment process. It is critical to note that although a trail may not meet Section 1017 accessibility standards, all constructed facilities on the trail or at the destination must comply with ABAAS standards, i.e., camping, picnicking, view areas, restrooms and other constructed facilities. Many visitors with disabilities can navigate non-standard trails into the backcountry but upon arrival may be unable to use constructed facilities with physical barriers. The only exemption for backcountry facilities is the primitive outhouse with riser on a hole dug into the ground.

<u>Trailhead signs</u>: Trail information signs at trailheads shall include the following:

- 1. Length of the trail or trail segment
- 2. Surface type
- 3. Typical and minimum tread width
- 4. Typical and maximum running slope
- 5. Typical and maximum cross slope

Conducting trail assessments: The High Efficiency Trail Assessment Process (HETAP) tool provides the most effective means of conducting trail assessments. This tool is a wheeled carriage (baby jogger size) with a mounted computer that stores photos, barrier observations, and field data such as length, running slope, and cross-slope measurements at designated intervals. A Rotational Penetrometer (RP) should be used in tandem with the HETAP tool to measure the firmness and stability of the trail surface. The data collected can be used for evaluating the trail in meeting ABAAS Section 1017 requirements, including trail length, width, surface, running slope, cross slope, and tread obstacles. The park can generate a report from the data to estimate and plan trail improvements. In addition, the data can be used in providing information for trailhead signage. The final HETAP trail data is presented in excel spreadsheets and should be left with the park for future planning purposes. If HETAP equipment is not available, information can be collected by a measuring wheel, tape measure, and smart level. (Note: The HETAP equipment is manufactured by Beneficial Design, Inc. and is used by several parks. Other manufacturers may carry this equipment.

MINIDOKA NATIONAL HISTORIC SITE ACCESSIBILITY SELF-EVALUATION AND TRANSITION PLAN **APRIL 2019**

This Accessibility Self-Evaluation and Transition Plan has been prepared as a collaborative effort between Minidoka National Historic Site, Pacific West Regional staff, and the Denver Service Center and is recommended for approval by the superintendent.

Approved Date

Superintendent, Minidoka National Historic Site





As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historic places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

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