

FINAL ADA TRANSITION PLAN M-NCPPC MONTGOMERY PARKS

prepared for

The Maryland National Capital Park & Planning Commission
Montgomery Parks
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Silver Spring, Maryland 20901
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2016 FINAL TRANSITION PLAN
M-NCPPC MONTGOMERY PARKS
AUGUST 2016

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ADA TRANSITION PLAN

2016 FINAL SELF EVALUATION AND TRANSITION PLAN

[UPDATE OF 2015 INTERIM TRANSITION PLAN]

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CERTIFICATION

EMG has completed a Comprehensive American Disabilities Act Evaluation (ADA Evaluation) of selected Maryland National Capital Park and Planning Commission Montgomery Parks (M-NCPPC Montgomery Parks) properties in Montgomery County, Maryland, in accordance with the requirements for a Self-Evaluation under the Department of Justice Settlement Agreement dated August 16, 2011. The requirements of 28 CFR Part 35, the 2010 ADA Design Standards for Accessible Design, and State of Maryland ADA Code as adopted by Montgomery County, were used in the Self-Evaluation. The Architectural Barriers Act (ABA) Accessibility Guidelines for Outdoor Developed Areas, developed by the US Access Board in 2009 and finalized in November 2013, were also used in the Self-Evaluation process. Although the ABA Guidelines do not apply to state and local governments, Montgomery Parks elected to review its facilities in relation to the ABA guidelines as a best practice.

The conclusions and recommendations presented in this report are based on the evaluations of properties under the jurisdiction of the M-NCPPC Montgomery Parks, as well as conclusions and recommendations of the previously submitted 2012 to 2015 Interim Transition Plans, and associated documents related to park properties. The 2012 Transition Plan, developed by Recreational Accessibility Consultants, LLC, has been incorporated in part into this document for continuity.

EMG Project Architects and Project Engineers conducted evaluations during site visits to individual park properties. The resulting reports are based on appropriate inquiry of M-NCPPC Montgomery Parks' authorities, our Project Architects' and Engineers' observations during site visits conducted September 2013 through 2015, as well as early 2016 for several recently completed park renovations and our experience with similar properties.

There may be ADA barriers in areas which were not readily accessible, and/or may not have been visible. Individual facility reports describe park conditions at the time of the observations and research. The 2016 Final Transition Plan report is not an engineering evaluation of physical conditions. The Self-Evaluation did not include engineering evaluations or engineering calculations to determine the adequacy of the park or facility's original design.

This report has been prepared on behalf of and exclusively for the use of the M-NCPPC Montgomery Parks for the purposes stated herein. The report, or any excerpt thereof, shall not be used by any party other than the M-NCPPC Montgomery Parks, or for any other purpose than that specifically stated in our agreement or within Section 1.0 of this report without the express written consent of M-NCPPC Montgomery Parks.

Any questions regarding this 2016 Final Transition Plan report should be directed to Robert L Green Jr., Senior ADA Compliance Project Manager, M-NCPPC Montgomery Parks at Bob.Green@montgomeryparks.org or (301) 495-2571.

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1 EXECUTIVE SUMMARY

1.1 INTRODUCTION

The Americans with Disabilities Act (ADA) of 1990, provides comprehensive, wide-ranging rights and protections to individuals with disabilities in the areas of employment, public accommodations, state and local government services, and telecommunications. Many consider it to be one of the most important civil rights laws since the Civil Rights Act of 1964. The goal of the ADA is to ensure equality of opportunity, full participation, and independent living to all individuals including those with disabilities; it expressly prohibits all state and local governments, and most private businesses and non-profits from discriminating on the basis of disability. The ADA provides a clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities.

The ADA defines a disability, with respect to an individual, in one of three ways: a physical or mental impairment that substantially limits one or more major life activities; a record or history of such impairment; or perceived by others as having such an impairment. Major life activities include, but are not limited to, caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, and working.

The ADA is divided into 5 Titles: Employment, Public Services, Public Accommodations and Commercial Facilities, Telecommunications, and Miscellaneous Provisions. This report focuses on the Title II requirements for M-NCPPC Montgomery Parks. The Department of Justice (DOJ) is responsible for the enforcement of the provisions of the ADA under Title V. The DOJ's regulations implementing Title II of the ADA dictate that local governments and public agencies such as M-NCPPC must evaluate their services, programs, policies, and practices and identify barriers that may limit accessibility for individuals with disabilities and develop transition plans describing how they will address identified barriers.

In 2006, the DOJ, as part of its Project Civic Access initiative, conducted a comprehensive analysis of Montgomery County and M-NCPPC Montgomery Parks for compliance with Title II requirements. As a result of this mutually coordinated effort, DOJ, Montgomery County, and M-NCPPC Montgomery Parks entered into a Settlement Agreement (SA). This agreement, entitled "Settlement Agreement between the United States of America and Montgomery County, Maryland and Maryland National Capital Park and Planning Commission under the Americans with Disabilities Act DJ 204-35-256²" is dated August 16, 2011. The SA stipulates in part that M-NCPPC Montgomery Parks conduct self- evaluations over a specified timeline, perform upgrades at 19 specific facilities between 2011 and 2016, and submit an Interim Transition Plan (ITP) every year, with the Final Transition Plan (FTP) to be submitted in August 2016. The SA further requires that M-NCPPC Montgomery Parks evaluate all of its programs, services, and activities for conformance with the ADA. Transition Plans, including the FTP, have been made available online and in hard copy for the public to view and provide comments. Parks has also prepared a condensed version of the Transition Plan for public review and comment, which can be found on the website: <http://www.montgomeryparks.org/about/ada.shtm#Plan>

In 2010, the Department of Justice issued revised and expanded ADA regulations. The new regulations revised and updated earlier standards as well as included new standards for various recreational uses such as play equipment, amusement rides, fishing piers, etc. These are collectively called the 2010 ADA Standards for Accessible Design (the "2010 Standards"). These new standards guide all new park construction and renovation projects. All facilities and parks have been evaluated using the 2010 Standards. Furthermore, Montgomery Parks has also elected to evaluate paved trails, campgrounds, and other outdoor facilities with yet-to-be adopted guidelines proposed by the US Access Board as a best practice. Currently, the ABA Guidelines for Outdoor Developed Areas are applicable to certain federal agencies on federally owned lands, and to vendors who may conduct certain activities on behalf of the federal government on federal properties.

This 2016 Final Transition Plan for the M-NCPPC Montgomery Parks satisfies the ADA requirements for a Self-Evaluation of the public park system, as well as the requirements and conditions of the Settlement Agreement. The 2016 FTP utilizes the previously prepared ITPs. As indicated in prior submissions, the objective remains the same: balance the desire for a barrier-free accessible park system within the realities of budgetary constraints. Priorities and schedules for barrier removals have been established at the park, amenity and individual barrier level. The FTP encompasses all of developed parks within Montgomery County, and represents the summation of data collection processes, planning efforts, strategy development, and barrier removals accomplished to date.

Throughout this report, various terms are used to describe M-NCPPC Montgomery Parks. The report uses terms such as M-NCPPC Montgomery Parks, Parks, or Montgomery Parks interchangeably. They should be considered one and the same entity. Similarly, the Maryland–National Capital Park and Planning Commission (M-NCPPC) may be referred to as the Commission. M-NCPPC Montgomery Parks are further described in Chapter 2.

Appendix A further defines, expands, and explains many of the concepts, definitions, and requirements of ADA and Title II. It is highly recommended that the reader utilizes and understands this important information prior to reading this report.

1.2 ADA PROGRAM STRATEGY AND INITIATIVES

1.2.1 OVERALL STRATEGY

The proposed strategy for ADA compliance is a multi-stage approach for **physical access** as well as **program access**. The goal of this strategy is to ensure that the programs, services, and opportunities offered by Montgomery Parks are accessible to the citizens of the County, regardless of abilities.

Physical access is proposed to focus on both recurring amenities and unique amenities. **Recurring amenities** are those which occur and are repeated in a number of parks, such as playgrounds, playing fields, basketball and tennis courts, and other recreation amenities. A **unique amenity** is defined as one offering a singular experience or activity in the Park System. Examples include historic buildings and sites, a tai-chi court, a carousel, and a golf driving range. M-NCPPC recognizes that a few unique amenities within its system may be duplicated, however, due to unique types of offerings, geographies, or overall uses, those amenities can still be defined as unique as a matter of policy. Examples of these types of amenities include Brookside Gardens, archery ranges, ice rinks, and several of the nature centers.

As its foundation, the proposed strategy is to ensure that at least **one in three** recurring amenities and **all** unique amenities are accessible, subject to various limitations such as technically infeasible conditions and funding limitations. The strategy takes into account numerous factors such as population density, proximity to public transportation, park types (countywide vs. community), amenity uniqueness, and other factors. This strategy will enable the best use of available funds to provide the optimal facility access to park programs for all citizens. Additionally, the objective is to provide a reasonable geographic distribution of accessible amenities as well as a destination trip limit of approximately 15-20 minutes by vehicle. The long term and ultimate goal, after full implementation of the Final Transition Plan, is to provide accessibility to all programs, services, and opportunities within Montgomery County.

Program access will be an ongoing effort. While Montgomery Parks will continue to improve physical access, the team in the Program Access office will develop and expand its view of many programs with a focus on increased staffing, policy initiatives, inclusion, and reasonable modification needs. Based upon preliminary surveys, most of the programs offered by Parks are concentrated in three areas: nature camps/centers, Enterprise camps/lessons, and volunteer programs. The Volunteer Services office is able to use Program Access services while conducting all trainings.

1.2.2 ADA PROGRAM INITIATIVES

Subsequent to the 2011 DOJ Settlement Agreement, the M-NCPPC Montgomery County Parks has reviewed, expanded and updated its policies with regard to its ADA compliance. The effort is ongoing and will continue well into the future. M-NCPPC has taken a number of steps towards achieving optimal accessibility in accordance with the 2011 Settlement Agreement, the applicable ADA regulations, and local codes. As a result, significant progress has been made in many areas between 2011 and the 2016. Examples of these efforts include the addition of permanent staffing, completion of numerous barrier removals, significant in-house trainings of staff, completion of an ADA Compliance Manual, policy development, creation of an ADA Access Team to oversee and guide the ADA effort at Parks, expansion of public outreach efforts, and website enhancements. Detailed and expanded information is provided in Section 4.1.

1.3 THE 2016 FINAL TRANSITION PLAN

The 2016 Final Transition Plan (FTP) represents a snapshot in time of the ongoing ADA efforts to evaluate, prioritize, and schedule ADA barrier removal, ensure that Program Access is provided consistently and system-wide, as well as to document all completed projects. The 2016 FTP reflects the completion of all individual facility self-evaluations, provides updates to ongoing ADA activities within Montgomery Parks, and finalizes the strategy to prioritize barrier removals. The FTP is the blueprint for attaining optimal accessibility within the budgetary capabilities of the agency.

The FTP, which is required per the 2011 Department of Justice Settlement Agreement, is and must be a flexible, living document, as priorities and funding opportunities may change significantly over time. In 2016 and beyond, countywide demographics are bound to vary from the current demographic composition. Public preferences for recreational uses may change, and funding sources may be altered as well. Additionally, other departmental initiatives may come into effect that will affect the requirements for services to park users. Thus, flexibility and responsiveness to inevitable changes must be reflected in shaping this (and future) Final Transition Plans.

1.3.1 INTERIM TRANSITION PLAN AND SELF-EVALUATIONS

Self-evaluations were conducted from 2012 to 2015, resulting in submissions of four Interim Transition Plans to the Department of Justice, as required by the terms of the Settlement Agreement with the Department of Justice. In 2016, several additional self-evaluations were conducted to reflect recently completed, major park renovation projects and have been included in this FTP.

All of the results of the previous self-evaluations and Interim Transition Plans are incorporated into the Final Transition Plan.

1.3.2 2016 FINAL TRANSITION PLAN SUMMARY

The 2016 Final Transition Plan establishes priorities for all evaluated facilities, amenities and the barriers found within those amenities. In short, the Montgomery Parks system has been evaluated for compliance; only facilities/structures not open to the public, or anticipated not to be open to the public, have been excluded from the Self Evaluation process.

Planning level estimated values for barrier removal, along with the extent of barrier removal efforts completed or currently funded, will change as the entire park system undergoes the process of barrier removal, and as the system is evaluated in the future, beyond the 2016 Final Transition Plan.

The 2016 Final Transition Plan assigns priorities to the parks, amenities and barriers observed during the Self-Evaluation process. Three types of prioritization have been used.

- First, rankings were established at the park level, based upon population densities within the County, park type (countywide versus community), availability of public transportation, and the presence of unique amenities.
- Second, amenity ratings were assigned to each type of amenity within the facility (see Appendix G, Part 1), as well as other criteria for recurring amenities.
- Third, rankings were assigned to each individual barrier based upon a set of priorities (see Appendix F), as well as barriers in the category of Easy Barrier Removal (see Appendix H).

The total planning level estimated cost of barrier removal for all facilities system wide including EBRs included in the Final Transition Plan covered under the current ADA regulations is approximately \$25.9 million, which represents a reduction from previous higher levels due to the active barrier removal program. The estimated cost of barrier removal covered under the ABA, which is not currently enforceable for Title II entities, is approximately \$5.1 million. The total combined estimated planning level cost for all barriers is therefore \$31 million excluding contingencies. However, based on the strategy of barrier removal at one of every three recurring amenity type, the total planning level cost for proposed barrier removal is estimated to be \$12.2 million, excluding various contingencies.

Previous ITPs utilized a 25% contingency factor. The 2016 Final Transition Plan utilizes a higher contingency factor, based upon actual recent construction projects and the current regulatory environment. The total contingency factor of 60% includes: 25% for general site conditions, unforeseen utility adjustments, mobilization, and subcontractor markups; plus 15% for locally mandated requirements such as stormwater management, sediment/erosion controls and landscaping/tree preservation; plus an additional 20% for surveys, design consultants, construction management, and permitting. These contingencies yield an additional \$18.5 million in total cost above the total planning level estimate of \$31 million. Thus, the total estimated cost of removing all barrier including contingencies is \$49.5million; in comparison, the estimated cost for barrier removals proposed in the FTP Phasing Plan (including contingencies) is \$19.6 million. Easy Barrier Removals (described in Section 5.3) are not included in the Phasing Plan but constitute an additional \$6.7million.

Funding for the barrier removal program will be provided by four different sources:

- ADA Local (community based, funded by Commission bonds)
- ADA Non-local (county wide; funded by County General Obligation bonds)
- Enterprise (self-funded by tickets, fees, and sales)
- The Parks operating fund for ongoing work/maintenance/repairs

The barrier removal process is being planned over the following four phases based on CIP six-year frame cycles: Phase 1 FY17-22, Phase 2 FY 23-28, Phase 3 FY29-34, and Phase 4 FY35-40.

The anticipated funding amounts dedicated to barrier removal during Phase 1 are \$4.5 million for **local parks** including local, neighborhood, and urban parks, and \$5.05 million for **non-local parks** including regional, recreational, special, and stream valley parks. Actual levels, after adjusting for administration, staffing, and program requirements are estimated to be \$4.0 million and \$4.3 million respectively. For the purposes of this report, the level of funding is assumed to be constant in future phases.

The Enterprise Division is self- funded through user fees and ticket sales. Due to its self-sustaining requirement, the Division will incur most, if not all, of the costs associated with ADA barrier removals within its facilities. Montgomery Parks will fund site improvements as part of the park renovation process. Thus, barrier removals are subject to yearly budget fluctuation and financial constraints.

The removal of barriers defined as Easy Barrier Removals (EBRs) will be conducted primarily by Facilities Management staff and the park region staff as part of ongoing work and maintenance programs and will be funded through the Parks operating budget. EBRs are discussed in further detail in Section 5.3.

The establishment of the priorities and ranking levels is determined both by the regulations under the Americans with Disabilities Act, and by the necessity to schedule barrier removals within an established framework. The framework is built upon the following factors:

- Level of ADA barrier removal, with the highest level given to unique programs and facilities, and to a selection of “one in three” for recurring amenities;
- Opportunity to combine ADA barrier removal with scheduled capital improvements, such as playground replacements, parking lot renovations, restroom repairs and/or park renovations;
- Development of an ongoing work program to eliminate easily removed barriers
- Funding sources and funding timelines;
- Realistic time frame for accomplishment;
- Geographic and demographic distributions; and
- Input from the community

More than likely, additional unknown variables, issues, and directives may, in the future, alter the strategies, schedules, and/or specifics within the Final Transition Plan or affect the barrier removal process. Regardless of other changes and influences, the goal remains the same: to provide an accessible park system consistent with the requirements of the Americans with Disabilities Act, the overall framework of this Transition Plan, and within the fiscal constraints of the budgetary process. The outcome of the prioritization effort is further detailed in Section 5.

2 THE ADA AND THE M-NCPPC MONTGOMERY PARKS

2.1 MARYLAND- NATIONAL CAPITAL PARK AND PLANNING COMMISSION- MONTGOMERY PARKS OVERVIEW

The Maryland – National Capital Park and Planning Commission (M-NCPPC) Montgomery Parks oversees a comprehensive system of approximately 416 parks, which is matched in its diversity only by the breadth and beauty of its sites. Montgomery Parks' sites include large and multi-faceted regional and recreational parks, special parks, urban parks, historic structures, natural stream valley and conservation parks, neighborhood parks, and local parks. Its facilities are diverse as well, from ice skating to tennis, from natural trails to dog parks to soccer fields to the Shirley Povich Baseball Complex, Brookside Gardens, and Hadley's Playground. Additionally, Parks offerings include such facilities as event centers, activity centers, and non-staffed recreation centers for smaller events. An overview of the park system is found in Appendix B.

(Note to Reader: Montgomery Parks has recently acquired two currently undeveloped parcels, Hyattstown Forest Special Park and Bennett Creek Conservation Park, which are now included in our current total of 418 parks. Because these parcels are undeveloped, they have not been included in the self –evaluation process or this Transition Plan. The text and tables and analyses are based upon 416 parks.)

Montgomery Parks' *Vision* is to be “an enjoyable, accessible, safe and green park system that promotes a strong sense of community through shared spaces and experiences, and is treasured by the people it serves.”

Montgomery Parks' *Mission* is to “protect and interpret our valuable natural and cultural resources; balance the demand for recreation with the need for conservation; offer a variety of enjoyable recreational activities that encourage healthy lifestyles; and provide clean, safe, and accessible places for leisure-time activities.”

Recent changes to the ADA, including new standards for many recreational facilities, mandate that M-NCPPC Montgomery Parks make recreational opportunities and programs more accessible to individuals with disabilities. The mandate is consistent with the vision and mission of the Commission.

Many gains in accessibility at Montgomery Parks have already been made to meet current ADA standards. A number of accessibility initiatives were adopted as “Best Practices” prior to final adoption as legal standards. Montgomery Parks is an award-winning agency in numerous categories, including the National Park and Recreation Association's prestigious Gold Medal Award for demonstrating excellence in long-range planning, resource management, and agency recognition.

Established by the General Assembly of Maryland in 1927, the Commission manages physical growth and plans communities, protects and stewards natural, cultural, and historic resources, and provides leisure and recreational experiences. A unique bi-county agency, the M-NCPPC comprises four departments: the Montgomery County Department of Parks, the Prince George's County Department of Parks and Recreation, the Montgomery County Planning Department, and the Prince George's County Planning Department. The Commission operates in each county through a planning board of five persons each, appointed by the respective County Council. The two planning boards combine to form the Commission governing board.

The Montgomery County Planning Board also serves as the Park Commission. In that role, it approves park and trail master plans, and provides recommendations, information, and analysis to the Montgomery County Council, County Executive, other governmental entities, and the general public.

The professional staff at M-NCPPC Montgomery Parks is recognized throughout the State of Maryland and nationally as experts in park and recreation planning and natural resource conservation. Montgomery Parks employs landscape architects, planners, project managers, parks and recreation professionals, park police, interpretive staff, historians, architects, engineers, safety experts, and others, all to enhance and steward the resources made available to Montgomery County residents and visitors.

Montgomery Parks has been a leader in many areas. It was one of the first communities in the U.S. to have a fully accessible baseball field with a fully accessible synthetic sport surface, called the Miracle League Field, which is located within South Germantown Recreational Park. The community support, corporate partnerships, and the efforts of M-NCPPC have made baseball accessible for many children with disabilities. Another example of a premier accessible amenity is Hadley's Playground within Falls Road Local Park, which was one of the first "Boundless Playground" facilities built in this area. Initiatives like these occurred long before it was required by law, because it was the right thing to do and was supported enthusiastically by its citizens. This type of work will continue long after the process of removing barriers has ended.

M-NCPPC Montgomery Parks' operating expenses are largely funded annually by County-assessed property taxes. Parks' major capital improvements construction activities for Local and Non-Local parks are funded through Commission-issued and countywide general obligation (GO) bonds respectively. In addition, the Montgomery Parks operates many facilities that are funded entirely or primarily through user fees, and those are included in an Enterprise Fund.

Montgomery Parks has numerous Public-Private Partnerships in which private entities are able to operate on parkland with considerations for public benefits. As the most significant public landholder in the county, Montgomery Parks maintains agreements with other public entities (for example Montgomery County Public Schools, Montgomery County Department of Recreation, and Community Use of Public Facilities) to provide services to residents. M-NCPPC also has various leasing arrangements/agreements with various organizations and individuals for a variety of uses within parkland.

2.2 M-NCPPC- MONTGOMERY PARK SYSTEM

2.2.1 PARK SYSTEM MANAGEMENT

The M-NCPPC Montgomery Park system administers 416 parks, and other facilities that are not classified as parks. Generally, park management is divided geographically into two management regions- Northern and Southern. The two regions are subdivided into eleven Park Management Areas. Specialty programs, such as Enterprise Facilities, managed or leased properties, historic/cultural resources, community gardens, and nature centers are managed by various in-house divisions with support from the regions, park management areas, and an in-house support/construction/repair division –the Facilities Management Division.

To support the management of the entire park system, a work order and asset management system called SmartParks (based on Facility Focus software) was developed in the early 2000's to identify properties, facilities, amenities, and various other assets and track maintenance and repair work associated with each. However, as the park system has grown and expanded and evolved, a new database toolkit was warranted. Further, the previous software was no longer supported by its provider. The requirements to identify and track ADA barriers and repairs further dictate the need to transition into a new Enterprise Asset Management (EAM) system. In cooperation with both Montgomery Parks and Prince George's Parks and Recreation, the Commission replaced the older SmartParks system and launched a new Enterprise Asset Management (EAM) system on November 13, 2014.

The new SmartParks/EAM system includes:

- the management of all work (Work Orders) performed within the Department
- All parks and maintained assets (parks, buildings, amenities)
- inventory control
- major maintenance and capital project management tracking
- linkages to the Commission financial systems (ERP) – currently in the planning stages
- support for mobile and web-based access
- capabilities to attach documents and photos to work orders and assets
- capture of all costs at an amenity level

A primary purpose of the new SmartParks/EAM is to support the ADA initiatives throughout the Parks Department. By tracking all work within a central, corporate database, the Department can achieve improved effectiveness and efficiencies in its daily operation and provide oversight to department management.

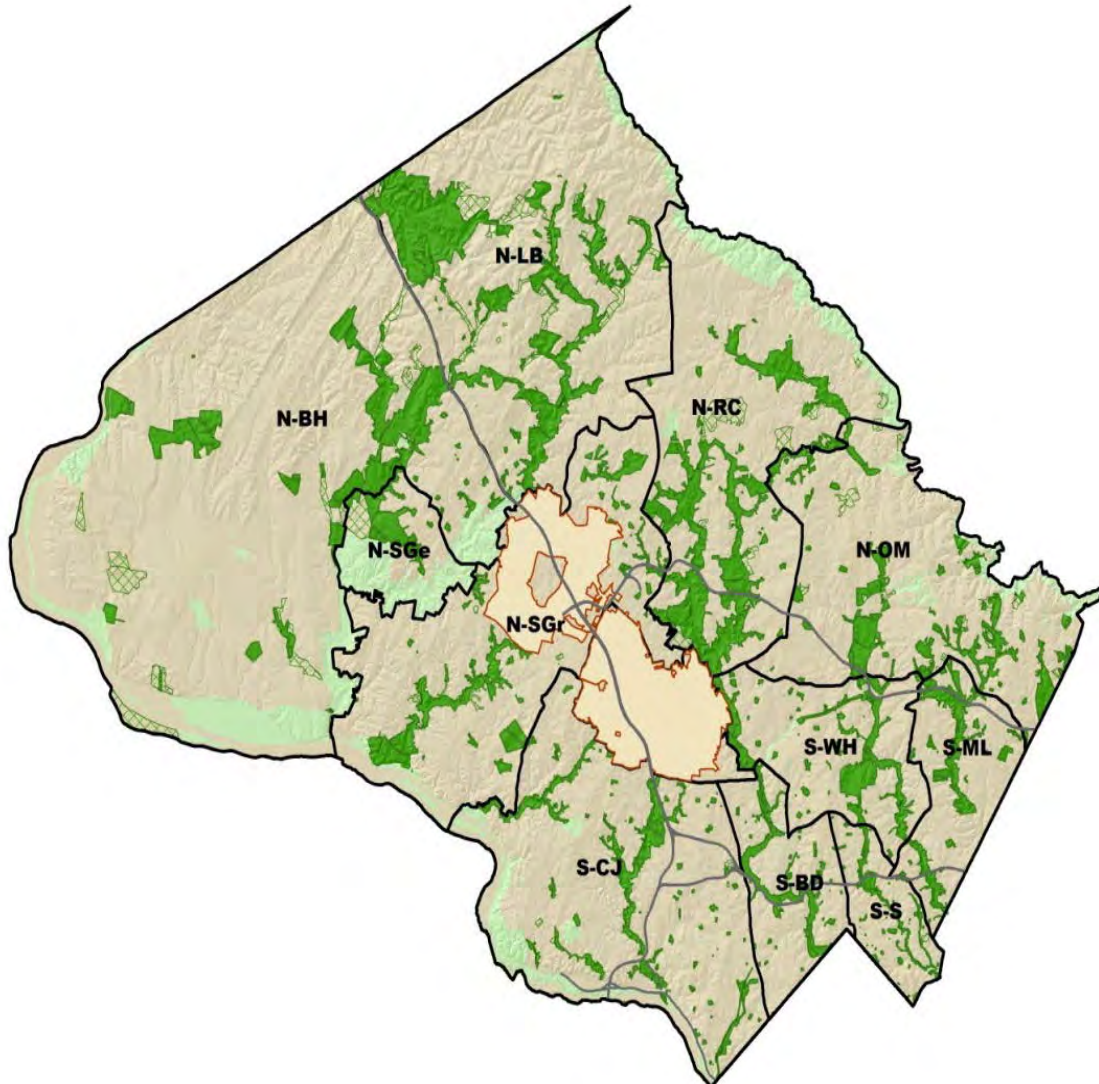
2.2.2 ADA DATA COLLECTION

Data collection for the Self-Evaluation was performed based upon park management areas in order to permit a seamless coordination effort between the evaluation teams and the park managers, who enabled access to buildings and various facilities. In addition, better efficiency was generally achieved due to the geographic distribution of the parks. All of the data gathered and used in the self-evaluation reports for the ITPs and FTP are based on SmartParks/EAM facility codes. Generally, buildings have unique codes apart from the park itself or in the case of large parks such as Wheaton Regional Park, the park itself may be divided into separate facility codes (such as ones for Brookside Gardens, the ice rink, the stables, the train station, etc.) for data management purposes.

Self-evaluations reports were prepared for each SmartParks/EAM facility. Thus, the reports themselves reflect the facilities identified by the SmartParks/EAM facility codes and not the 416 individual parks. Thus, the total number of self-evaluation reports exceeds the actual number of parks. The entire park system has been evaluated as required by the 2011 Settlement Agreement.

The park management system subdivides the park and facility inventory into eleven management areas.

Figure 2.2.2 -Geographic Boundaries of Park Management Areas



The listing below and Table 2.2.2 summarize the parks in each management area.

▪ **SOUTHERN MANAGEMENT REGION- 234 parks**

- Wheaton Area (S-WH) - 39 parks
- Cabin John Area (S-CB) - 71 parks
- Beach Drive Area (S-BD) - 48 parks
- Sligo Creek Area (S-SC) - 51 parks
- Martin Luther King Area (S-ML) - 25 parks

▪ **NORTHERN MANAGEMENT REGION- 182 parks**

- Olney Manor Area (N-OM) - 43 parks
- Rock Creek Area (N-RC) - 26 parks

Shady Grove Area (N-SGr) 42 parks
 South Germantown (N-SGe) - 5 parks
 Black Hill Area (N-BH) - 30 parks
 Little Bennett Area (N-LB) - 36 parks

Table 2.2.2- Parks by Management Area

PARKS BY MANAGEMENT AREA SUMMARY			
MANAGEMENT AREA	TOTAL PARKS	DEVELOPED PARKS	PARKS UNDEVELOPED/ UNDER CONSTRUCTION
WHEATON (WH)	39	35	4 UNDEVELOPED
CABIN JOHN (CJ)	71	52	19 UNDEVELOPED
BEACH DRIVE (BD)	48	37	10 UNDEVELOPED/ 1 UNDER CONSTRUCTION
SLIGO CREEK (SC)	51	47	4 UNDEVELOPED
MARTIN LUTHER KING (MLK)	25	23	2 UNDEVELOPED
OLNEY MANOR (OM)	43	29	14 UNDEVELOPED
ROCK CREEK (RC)	26	19	6 UNDEVELOPED/ 1 UNDER CONSTRUCTION
SHADY GROVE (SGr)	42	23	17 UNDEVELOPED/ 2 UNDER CONSTRUCTION
SOUTH GERMANTOWN (SGe)	5	4	1 UNDEVELOPED
BLACK HILL (BH)	30	18	11 UNDEVELOPED/ 1 UNDER CONSTRUCTION
LITTLE BENNETT (LB)	36	20	16 UNDEVELOPED
GRAND TOTAL	416	307	104 UNDEVELOPED / 5 UNDER CONSTRUCTION

See Appendix C for full listings of parks in each management area.

Within the park system, there are numerous conservation areas, stream valley parks, natural areas, and otherwise undeveloped properties on which there are no physical improvements. These properties comprise a total of 104 undeveloped parks which do not require evaluation, and thus are excluded from this Transition Plan. Should any of these properties develop in the future, any physical and/or programmatic improvements must comply with the current ADA Standards. The 2016 Final Transition Plan includes all developed facilities and parks in the system.

2.3 THE CAPITAL IMPROVEMENT PROGRAM FOR FY 2017-2022

The Parks Department Capital Improvement Program (CIP) is prepared every two years, and projects capital expenditures throughout a six-year cycle. The Department of Parks' FY17-22 CIP was adopted in May 2016, and therefore includes all proposed projects through 2022. The capital budget funds parkland acquisitions, environmental and cultural stewardship projects, new park or facility development, and renovations and infrastructure improvements.

The scheduled projects of the FY 17-22 CIP, while not fully ADA oriented, offer the opportunity to combine ADA improvements with other park development/repair/renovation projects. Due to the ease of accomplishing ADA barrier removal with already planned construction projects, the CIP planned projects must be given priority for barrier removal. The Montgomery County Department of Parks CIP for FY 17-22 has scheduled 41 major projects in FY17 and FY18. It is estimated that 30 out of the total 41 projects (approximately 73%) may be able to include ADA improvements as part of the scope of work for each respective project. Examples of such projects are playground renovations, various court rehabilitations, parking lot alterations, building upgrades, and park renovations.

More information about the FY17-22 CIP can be found online on the Montgomery County Office of Management and Budget website at <http://www.montgomerycountymd.gov/omb/publications.html>

See Appendix I- Capital Improvement Program FY 2017-2022.

2.4 DESIGNATION OF PUBLIC PARKS BY FUNDING SOURCE

Maryland-National Capital Parks and Planning Commission (M-NCPPC) Montgomery Parks divides its parks into two major types: Countywide and Community. These designations typically describe the function/service a particular park might provide, and generally correlate to funding sources used to create the park. Non-Local (Countywide) Parks are funded by County General Obligation Bonds, while Local (Community) Parks are funded by Commission Bonds. There is also a third funding source which is fee-based (ticket sales) by the Enterprise Division.

COUNTYWIDE/ NON-LOCAL

- Regional- large regional parks serving a wide user area
- Recreational- large parks with sports fields and other intensive recreational amenities
- Special- historical and other unique facilities
- Conservation Area- large tracts of no or minimal development which preserve county-wide open space
- Stream Valley- tracts which preserve environmentally sensitive stream valley areas
- Miscellaneous Facilities- units for system maintenance and other functions

COMMUNITY/ LOCAL

- Urban- smaller parks in areas of concentrated development
- Local- parks serving local areas funded through local evaluations
- Neighborhood- parks serving neighborhood areas
- Neighborhood Conservation Area- tracts of no or minimal development which preserve open space in neighborhood areas

ENTERPRISE

The Enterprise Division manages or oversees the operation of twenty distinct facilities that are primarily or entirely funded through user fees, rentals and other non-tax revenue sources. The facilities include the ice rinks, indoor tennis facilities, event centers, a synthetic turf pavilion and a number of park facilities such as the miniature trains, boat facilities, campgrounds, splash park, miniature golf course, driving range, and a carousel, as well as oversight of a number of recreation facility leases. In recognition that some of these recreational experiences are more exclusive than others, such as ice skating, indoor tennis, or miniature golf, a fee is charged to provide these experiences. These exclusive use facilities are included in the Department's Enterprise Fund, which, by policy, is required to be self-sustaining. This includes operating costs, maintenance and renovation costs, capital improvements, administrative costs and debt service payments. Due to its self-sustaining requirement, the Enterprise Division will incur most, if not all, of the costs associated with ADA barrier removals at its facilities. Thus, barrier removals are subject to yearly budget fluctuation and financial constraints.

A listing of Enterprise facilities and their locations are as follows:

Enterprise Managed

- Ice Rinks: Cabin John and Wheaton Regional Parks
- Boat Rentals: Black Hill Regional Park and Lake Needwood, part of Rock Creek Regional Park
- Splash Park and Mini-Golf: South Germantown Recreational Park
- Driving Range : South Germantown Recreational Park
- Wheaton Sports Pavilion: Wheaton Regional Park
- Pauline Betz Addie Tennis Center: Cabin John Regional Park
- Wheaton Indoor Tennis: Wheaton Regional Park
- Event Centers: Rockwood Manor, Seneca Lodge, Woodlawn Manor
- Camping: Little Bennett Campground at Little Bennett Regional Park
- Trains: Cabin John and Wheaton Regional Parks
- Ovid Hazen Wells Carousel: Wheaton Regional Park (scheduled for relocation)

Park Managed

- Agricultural History Farm Park (Lease Agreement)
- Garden/ Events: Brookside Gardens

See Appendix B and C for a summary of Montgomery Parks facilities.

2.5 PARK AMENITIES

For management purposes, the named components which exist within individual parks are referred to as **amenities**, and serve park users, as well as support the purpose of the park unit. A summary of the primary amenities evaluated in the parks, as defined in the SmartParks/EAM system database is as follows:

Activity Centers	Fire Circles	Parking Lots
Amphitheaters	Fishing Piers	Park Activity Buildings
Archery	Football Fields	Picnic Shelters
Arenas	Gazebos	Picnic Areas
Barns	Golf Courses	Piers
Basketball Courts	Greenhouses	Playgrounds
Baseball Fields	Gymnasiums	Racquetball Courts
Boat Docks	Handball Courts	Riding Rings
Boat Rentals	Historic Properties/Uses	Sidewalks
Boat Ramps	Horseshoe Courts	Skate Park
Bocce Court	Houses	Snack Bars
Botanical Gardens	Ice Rinks	Soccer Fields
Bridges (Pedestrian)	In-line Skating Facilities	Softball Fields
Buildings	Kiosks	Sports Pavilion
Cabins	Kitchens	Splash Park
Campground	Lacrosse Fields	Stables
Carousel	Maintenance Buildings	Tai Chi Court
Community Gardens	Mansions	Tennis Courts
Contact Stations	Meeting Rooms	Tennis Buildings
Cricket Fields	Miniature Trains	Trails (Hard-Surface)
Dog Parks	Mini-golf	Trails (Unimproved)
Driving Ranges	Multiuse Courts	Tree Nursery
Equestrian Centers	Multiuse Fields	Volleyball Courts
Event Center	Museums	Visitor Centers
Exercise Trails	Nature Centers	

See Appendix G, Part 1, for a list of amenities and ranking scores by type.

2.6 ADA COORDINATION WITHIN MONTGOMERY PARKS

Within M-NCPPC Montgomery Parks, the ADA Access Team facilitates the Department's compliance with Title II requirements and the ADA and provides expertise regarding the Americans with Disabilities Act. Generally, an ADA coordinator is responsible for ensuring that all programs, services, and activities provided are accessible to individuals with disabilities.

The ADA Access Team consists of the Senior ADA Compliance Project Manager, an ADA Compliance Manager, the Program Access Coordinator, a Program Access Specialist, and the ADA Facilitator from the Facilities Management Division. Collectively, this team serves as the ADA Coordinator for Montgomery Parks; however, all final decisions rest with the Director, Montgomery Parks.

In order to facilitate the ADA compliance process and to provide direction for staff interaction with the public, an inter-divisional ADA Implementation Team (AIT) was established in 2012 to represent various divisions within the Department. Members represent the Northern and Southern Park Management Areas, Facilities Management, Park Development, Park Planning and Stewardship, Enterprise, Horticulture, Forestry and Environmental Education, Management Services, Public Affairs and Community Partnership, and senior administrative staff. The ADA Implementation Team was led by the Senior ADA Compliance Project Manager, who oversaw the Self-Evaluation process, coordinated, and managed various ADA efforts, and is now a member of the ADA Access team. The AIT assisted in the development of barrier removal strategies, and provided guidance and direction in policy review, staff training, and internal divisional coordination.

The newly developed Program Access Office comprises two full-time career staff. The Countywide Program Access Coordinator manages the daily operation of the Program Access Office, including inclusion services, accommodations, support services, education, training and outreach to both internal and external customers, and supervises the Countywide Program Access Specialist. The Program Access Specialist is responsible for the coordination of direct services for program participants, their families, and staff, including implementation of program adaptations, behavior management plans, and monitoring of participant progress.

The ADA Facilitator coordinates with trades staff and other internal departments, schedules and oversees the EBR work program, and assist in training Facilities Management staff.

2.7 2011 SETTLEMENT AGREEMENT WITH THE DEPARTMENT OF JUSTICE

Since the initial adoption of the original 1991 ADA Standards, the DOJ, designers and advocates for the disabled have continued to improve accessibility and inclusion of all people in public facilities. There have been two major undertakings in recent years that have brought access into the forefront.

First, the DOJ developed its Project Civic Access (PCA) program to study how communities were achieving accessibility. As part of this program, DOJ audited a number of public facilities, counties, local governments, etc. throughout the country including Montgomery County in 2006. The PCA process continues around the country to this day. DOJ audited numerous buildings and facilities throughout Montgomery County including 19 parks in the Parks Department system; these audits identified various "barriers" to accessibility.

Second, the DOJ issued new Title II regulations, which became effective March 11, 2011 along with the 2010 ADA Standards for Accessible Design, which became effective in March 2012. The 2010 ADA Standards addressed many recreational and sports environments for the first time. These include playgrounds, soccer fields, softball fields, dog parks, boating/fishing facilities, amusement rides, and other outdoor activities, which are now subject to the 2010 ADA Standards.

In an effort to move forward with addressing the barriers identified in the DOJ audits and to create a framework for achieving system-wide accessibility, M-NCPPC Montgomery Parks joined with Montgomery County in signing a Settlement Agreement (dated August 16, 2011) with the DOJ that sets forth requirements and a timeframe for implementation, including:

- Perform upgrades to the 19 parks audited by DOJ with established due dates (see Section 4.13)
- Perform self-evaluations of all park sites not audited by DOJ (20% per year) through 2016
- Perform policy reviews and initiate employee training

- Conduct public outreach and upgrade communications
- Provide and install ADA signage at various selected parks (see Section 4.14)
- Submit annual progress reports (ITPs) and a Final Transition Plan by August 16, 2016 that includes a summary of all access barriers, a prioritization of corrective repairs, and a phasing for making corrections which are deemed to be necessary.

2.8 PROTOCOL FOR SELF-EVALUATION

The initial Self-Evaluation and Interim Transition Plan submission in 2012 was performed by Recreational Accessibility Consultants (RAC). EMG was tasked with completing the Self-Evaluation of M-NCPPC Montgomery Parks' facilities in 2013, 2014, and 2015, and the 2016 Final Transition Plan. The evaluation teams evaluated specific parks, facilities, and properties through on-site review of the physical condition at each facility and/or park. The evaluation teams conducted walk-through evaluations of all building and exterior areas in order to observe the existing building components and site components, to identify physical accessibility barriers, and to formulate recommendations to remedy those barriers. The self-evaluations and subsequent reports were based on the SmartParks/EAM facility codes provided for each and facility within the park system.

Consistent with its overall mission, M-NCPPC Montgomery Parks has been proactive in its desire to meet and exceed all ADA requirements and standards. While it is incumbent upon the Department to comply with the 2010 ADA standards, Montgomery County codes, and the State of Maryland Accessibility Code, Montgomery County Parks has elected to include various amenities that are not regulated in the current standards. Amenities such as paved trails, picnic areas, and camping areas are included in the ABA Accessibility Guidelines for Outdoor Developed Areas and have been incorporated as a best practice.

2.8.1 PROTOCOL COMPONENTS

As a part of the on-site evaluation, the consultant teams reviewed all of the facilities' interiors and park exteriors identified by M-NCPPC Montgomery Parks. For this comprehensive evaluation, all visible exterior site and interior building components within the respective facilities of the public park system were assessed, and their physical conditions were documented and evaluated in accordance with the 2010 ADA Standards, the State of Maryland Accessibility Code Title 05, Chapter 02 adopted by Montgomery County, as well as selected areas of the Architectural Barriers Act (ABA) Accessibility Guidelines for Outdoor Developed Areas (dated 2013).

Visual observations and physical measurements were made of all known and readily available physical elements. In general, where conflicts exist among the above-mentioned three codes/regulations, the stricter regulation was applied. For example, the proposed ABA Guidelines permit running slopes of up to 8.3% on outdoor access routes. The evaluations used the stricter 2010 Standards limit of a maximum 5% running slope for all accessible routes.

The following protocol was utilized in the self-evaluation process:

- Prior to onsite evaluations, EMG captured the unique park ID codes associated with each amenity for seamless tracking and integration with SmartParks/EAM system.
- The evaluation team interviewed staff relative to the park's programmatic use related to the ADA, various repairs, replacements and their costs, and pending repairs and improvements.
- The evaluation team developed opinions based on the on-site visits, utilizing previously developed, comprehensive checklists based on the various standards, codes, and requirements.
- EMG established an online database in www.Assetcalc.net, which is used to compile records of all deficiencies (barriers), store photos and documents related to the individual facilities, and create various reports including self-evaluations reports for each facility. AssetCALC™ is EMG's database solution for data collection, costing, and reporting. AssetCALC™ provides the ability to list, prioritize, query, and track deficiencies. Reports can be queried instantaneously to reflect newly corrected items providing the ability to track progress over time.
- Barriers, which were evaluated based on the ABA Outdoor Developed Areas Guidelines, have been identified separately from barriers evaluated under 2010 ADA Standards for Accessible Design and State of Maryland requirements.

- Data, photographs, barrier identifications, and reports from the 2012 ITP performed by RAC were transferred into the AssetCalc database by Parks staff thus providing a seamless, fully integrated database.

All general findings relating to these physical barriers and a summary of the estimated costs to remedy the barriers are included in the relevant narrative sections of this 2016 Final Transition Plan report. The detailed physical barriers were captured and evaluated in separate self-evaluation reports for each individual park and/or facility utilizing the previously described SmartParks/EAM facility code.. Barriers were captured at the amenity level but can also be reported at the park level for determining accessibility. The individual self-evaluation reports are submitted to DOJ concurrently with the Final Transition Plan.

General ADA and self- evaluation requirements are further detailed in Appendix A,

2.8.2 SELF-EVALUATION TIMELINE

The self-evaluation process was initiated in 2012 and continued through 2015, resulting in the submission of Interim Transition Plans in each respective year. The initial evaluations and 2012 Interim Transition Plan was prepared by RAC Consultants; all subsequent evaluations, reports and plans were conducted by EMG. The process was accelerated and all self-evaluations were completed approximately one year in advance of the scheduled due dates. The 2015 Interim Transition Plan included 100% of the developed facilities, exclusive of those currently under construction. The Final Transition Plan includes two parks which were under construction during 2015.

Please note that other governmental agencies (i.e. Montgomery County Public Schools, Montgomery County Revenue Authority, Montgomery County Department of General Services, Montgomery County Recreation Department), whose facilities/services (i.e. pools, schools, recreation centers, golf courses) are located on park land, are responsible for conducting independent ADA evaluations and creating separate transition plans for those facilities.

2.8.3 FINDINGS OF THE SELF-EVALUATION

Based on observations and the age of the majority of the infrastructure, it is not surprising that many facilities are not in full compliance with Title II of the Americans with Disabilities Act. Many of the parks and facilities were acquired or developed long before the ADA became law; further, the standards for recreational amenities are a relatively recent development. The physical barriers within buildings and parklands, as defined by the 2010 Standards for Accessible Design, the State of Maryland Accessibility Code, and the Architectural Barriers Act (ABA) Outdoor Developed Areas Guidelines are identified in separate, individual self-evaluation reports for each SmartParks/EAM facility. Detailed descriptions and evaluations of existing conditions for all barriers, and estimated costs for eliminating the barriers, included in each self-evaluation report were submitted concurrently with the respective ITPs and this Final Transition Plan.

The park system encompasses 416 parks. Of the total number of parks, 312 are developed parks; the remaining 104 parks are undeveloped or lack amenities regulated by the ADA. Of the 312 developed parks, 5 parks are currently under construction or planned for construction in the near future, and will be evaluated once onstruction is complete. Therefore, a total of 307 developed parks required assessment for the Final Transition Plan. See Appendix C for the full listing of parks. See Appendix D for the full listing of SmartPark/EAM facilities evaluated.

Table 2.8.3 below provides a summary of total number of facilities evaluated and barriers found within each respective park management area.

Table 2.8.3- Facilities Evaluated by Management Area

SUMMARY OF EVALUATED FACILITIES BY PARK MANAGEMENT AREA				
MANAGEMENT AREA	TOTAL FACILITIES EVALUATED	DEVELOPED PARKS EVALUATED	AMENITIES	BARRIERS
WHEATON	79	35	538	1918
CABIN JOHN	87	52	476	2131
BEACH DRIVE	53	37	360	1265
SLIGO CREEK	61	46	513	1580
MARTIN LUTHER KING	33	23	273	860
OLNEY MANOR	37	29	360	1186
ROCK CREEK	35	20	355	1005
SHADY GROVE	27	23	206	604
SOUTH GERMANTOWN	10	4	169	500
BLACK HILL	31	18	296	955
LITTLE BENNETT	46	20	407	1597
TOTAL	499	307	3953	13601

2.9 DEVELOPMENT OF THE 2016 FINAL TRANSITION PLAN

The ADA became law in 1990 and DOJ issued the 1991 Standards for Accessible Design to guide its implementation. As required by the new law, Montgomery Parks prepared a “Transition Plan” in the early 1990’s which identified corrective actions for various Parks’ facilities and spaces, such as parking lots and buildings which were required to comply with the initial 1991 ADA Standards. While the 1991 Standards did not address recreation environments such as sports fields, courts, playgrounds, trails, and boating and fishing areas, etc., Montgomery Parks diligently worked to design and construct facilities, which provided accessibility according to the guidance and best practices available at the time.

Since 1992, ADA physical accommodations have been installed to promote access to the M-NCPPC Montgomery Parks facilities. Accessible parking stalls are located at key areas of park services. Permanent restrooms were made partially or fully accessible, for example, through retrofitting of grab bars and other restroom accessory additions or installation of curb cuts in accordance with the 1991 Standards.

Numerous other improvements, new parks and facilities, and renovation projects and new acquisitions have occurred since the early 1990’s. These factors as well as the recently enacted 2010 ADA Standards and conditions of the 2011 Settlement Agreement, require that the original transition plan be overhauled and updated.

The Self-Evaluation of all park facilities within the park system has been completed and all barriers have been identified and assessed. All evaluations address applicable physical attributes included in 2010 ADA Standards for Accessible Design, and the Maryland Accessibility Code. Additionally, applicable amenities such as picnic areas, campgrounds and paved trails were evaluated using the ABA Outdoor Developed Areas Guidelines. The Self-Evaluation informs M-NCPPC Montgomery Parks of which amenities are currently accessible, the level of difficulty to remove each barrier, and the possible inter-relationship between barriers. This information, supplemented with knowledge of other upcoming Capital Improvement Program renovations and rehabilitations, helps to develop the scope of programmatic and architectural modifications required to achieve a reasonable level of accessibility. The primary concern is how best to prioritize the removal of the known barriers within the constraints of time and budget. Thus, the FTP identifies the strategy, the schedule, and the budgetary requirements needed to transition the park system into compliance with the ADA.

Many factors go into the prioritization of barrier removal for park amenities. These include population densities, park type, proximity to public transit, availability of restroom facilities, and amenity uniqueness among others. These factors are also considered in the context of geographic parity, institutional knowledge of SmartParks/EAM designated facilities, and input from the community. A relative ranking score has been developed for parks, for park amenities and for specific barriers at each amenity. Prioritized phasing of modifications to achieve access to programs and facilities is part of the Final Transition Plan.

The Final Transition Plan is a snapshot of where the park system is in 2016 and what strategies and directions Montgomery Parks proposes for the coming years. It is expected to evolve and be modified over time as barrier removals occur, funding changes, projects are delayed or new ones proposed or constructed, as CIP projects are re-evaluated, new information becomes available, public priorities change, and other factors. Thus, the Transition Plan is a living document, and it must be expected to grow and flex accordingly.

2.10 SCOPE OF THE 2016 FINAL TRANSITION PLAN

This Final Transition Plan is based and built on the 2012 Phase One Transition Plan conducted and developed by Recreational Accessibility Consultants, LLC in 2012, and the remaining Interim Transition Plans developed by EMG, Inc. The self-evaluations conducted under Phase One included the majority of the SmartParks/EAM designated facilities in the Cabin John and Wheaton management areas. The evaluations conducted under the 2013, 2014 and 2015 Interim Transition Plans included the remaining management areas as well as scattered facilities in other regions. The Final Transition Plan does include several recently completed park renovations which had not been included in prior self-evaluation years, and therefore completes the self-evaluation process.

The 2016 Final Transition Plan comprises the following components:

- Identification of the physical and/or programmatic barriers of the selected facilities under jurisdiction of the Maryland- National Capital Park and Planning Commission;
- Determination of the appropriate remedy and a planning level estimate of the cost of the repair and/or practice to eliminate the barrier or the discriminatory practice;
- Assignment of priority level to the remedy; and
- Formulation of the transition plan.

2016 Final Transition Plan, proposes to remove physical and programmatic barriers in existing facilities, as well as physical barriers whose removal is readily achievable, i.e., easily accomplished and able to be carried out without much difficulty or expense. This work is defined as Easy Barrier Removals (EBRs). See Section 5.3 for further description. The Transition Plan further describes other ongoing and proposed efforts to improve accessibility in the park system including ProgramAccess and website accessibility amongst other initiatives.

2.11 DOCUMENTATION USED IN THE TRANSITION PLAN PROCESS

As part of the ADA self-evaluation process and development of the 2016 Final Transition Plan, the following relevant documentation was reviewed to aid in the knowledge of the Montgomery County park system its planning and development, existing and proposed facilities, as well as their extent and types of use.

ADA TRANSITION PLAN

2016 FINAL SELF EVALUATION AND TRANSITION PLAN
[UPDATE OF 2015 INTERIM TRANSITION PLAN]
AUGUST 2016

EMG PROJECT NO.: 102516.12R000-00C.206

The following list provides details on the documentation used to develop the 2016 Final Transition Plan:

- 2012 Phase One evaluations and Report
- 2013-2015 Interim Transition Plans
- Smart Parks database and current EAM system configuration data
- GIS mapping of individual parks and park amenities
- Record drawings
- Capital Improvement Plan 2017-2022
- Vision 2030, Strategic Plan for Parks and Recreation, in Montgomery County, Maryland
- 2012 Park, Recreation and Open Space Plan (PROS)
- Playground Priority List
- Tennis Courts and Basketball Courts Priority List

3 M-NCPPC MONTGOMERY PARKS PLANNING EFFORTS

3.1 PARK PLANNING EFFORTS

The M-NCPPC Montgomery Parks develops its Capital Improvement Plan based on a number of planning efforts, both long-term and short-term. The Vision 2030 Strategic Plan for Parks and Recreation in Montgomery County, Maryland effort was undertaken in 2009 and completed in 2011. Vision 2030 provides a guide to park development over a twenty-year time frame. Vision 2030 includes strategies for maintaining and improving the overall levels of service across the County, as well as specific recommendations for providing the park and recreation facilities valued most highly by County residents.

Other periodic long-term planning efforts are the Park, Recreation and Open Space (PROS) Plans that propose guidelines for park development over a ten-year period. The PROS Plans are updated on a standard schedule and submitted to the State of Maryland. The 2012 PROS Plan was an update to the 2005 PROS Plan.

Additionally, the Capital Improvement Program (CIP) consists of specific planned improvement projects over a six- year period. The Parks CIP is part of the general Montgomery County CIP, and established on a biennial basis. Major Maintenance Program projects are evaluated and established by the Facilities Management Division every year and provides a summary of needed larger repairs to the park system.

These long-term strategies identified priorities for programmatic and physical planning, and included extensive public outreach. Through public outreach, M-NCPPC Montgomery Parks was able to survey public interest in the types of recreational programs and opportunities that Montgomery County residents desire most.

3.2 VISION 2030

Vision 2030 has several themes which can be highlighted as pertinent to ADA. One of the themes relevant to ADA is the second theme: Planning and Development. The goals and objectives under the Planning and Development theme are pertinent to the establishment of ADA priorities.

The first Planning and Development goal is "Adequate and appropriate public lands and facilities that are equitably distributed across the County to meet the needs of residents". Two of the goal's four objectives are substantially applicable to the development of this Transition Plan:

- Use population density information to set standards for Level of Service (LOS) based on composite values methodology to include assessing the quantity, quality, and mix of parks and recreation facilities and services.
- Prioritize projects to increase the Level of Service in the areas where data shows the highest needs.

The second Planning and Development goal in Vision 2030 is "Create a high functioning system of parks, recreation, trails, and open space that is responsive to changing community needs and interests." One of the goal's seven objectives is substantially pertinent to the development of the FTP:

- Improve the comfort and convenience of park and recreation users by providing adequate facilities such as accessible restrooms, drinking fountains, signage, parking, and other convenience features.

Supplementary to that objective are two more objectives which affect the decisions regarding locations of ADA barrier removal: "Rebalance the existing mix of athletic fields to better fit current needs for rectangle and diamond fields", and "Provide enough playgrounds to meet the need for convenient access to healthy play opportunities."

The third Planning and Development goal is “Expand and enhance opportunities for recreational trail experiences to promote health and wellness.” One of the goal’s objectives is “Address the needs of specialty trail users, including hikers, bikers, and equestrians.” Another specialty trail user group is the disability community. To this end, the hard surface trails have been evaluated per the ABA Outdoor Developed Areas Guidelines.

The fourth Planning and Development goal is “Expand park and recreation facility accessibility.” The objectives of the goal are to provide guidance for achieving ADA accessibility throughout the system. Two of the objectives apply directly to the development of the Final Transition Plans:

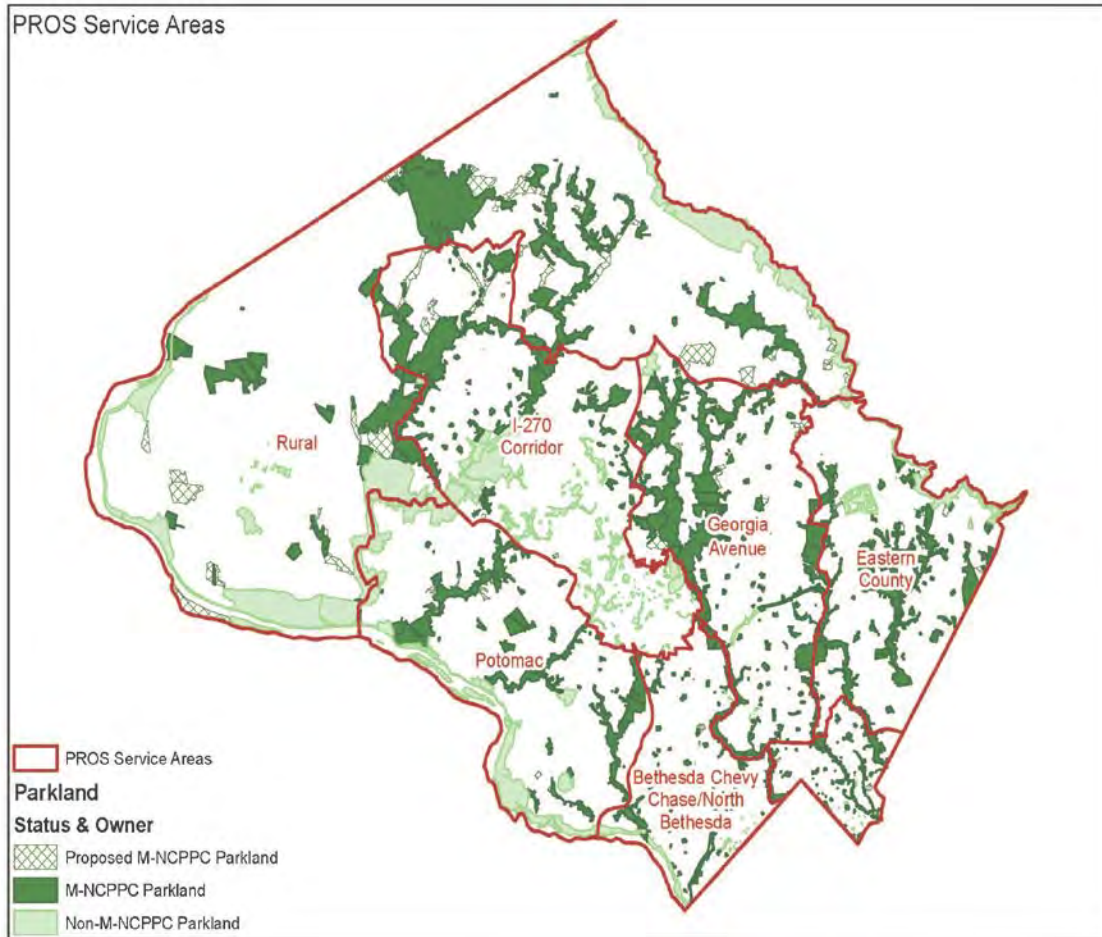
- Enhance access to parks, recreation facilities and programs, trails, and open space by setting measurable standards for different areas of the County.
- Incorporate the 2010 Americans with Disabilities Act Standards for Accessible Design into planning and development of new and renovated park and recreational facilities.

3.3 2012 PARK, RECREATION, AND OPEN SPACE (PROS) PLAN

Building on the findings of Vision 2030, the 2012 PROS Plan includes service delivery strategies for several priority facilities and resources over a ten-year period. The strategies were developed to guide M-NCPPC Montgomery Parks (and the Montgomery County Recreation Department) in locating publicly desired park and recreation facilities where they are currently lacking, and ensure that the parks and recreation system continues to optimally serve its users in Montgomery County.

The PROS Plan outlined the needs of the County and its communities for a number of specific recreational amenities. The report projected a specific total number of facilities required in various areas, as a general planning tool. Detailed information as to the needs of specific amenities in various sectors of the County is contained in the report. The geographic limits of the PROS Service Areas are provided in Figure 4.3.1 below.

Figure 3.3.1- Geographic Boundaries of the PROS Service Areas



SOURCE: 2012 PARK, RECREATION, AND OPEN SPACE PLAN (PROS)

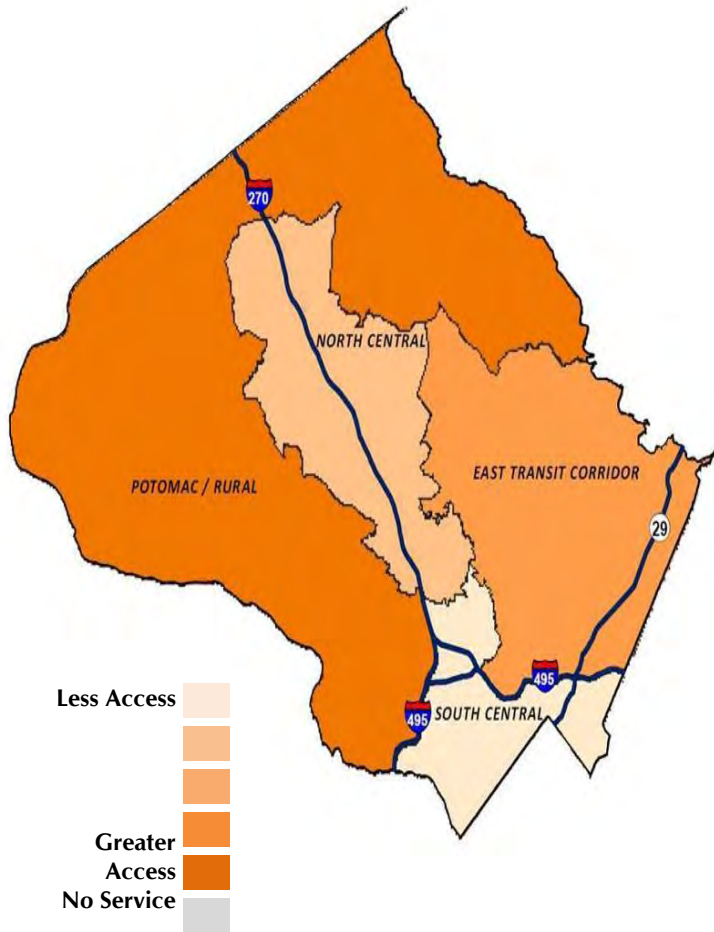
Highlights of the PROS Plan, which affect ADA prioritization, are:

- Short range and midrange proposals for facilities fall considerably short of the 2022 estimated needs, particularly with regards to rectangular athletic fields, skate parks and dog parks.

Cultural Sites: concentrate on the top 8 to 10 public interpretive sites, including, but not limited to: Woodlawn Manor and the Underground Railroad Experience Trail, Oakley Cabin, Josiah Henson Special Park, the Agricultural History Farm Park, Kingsley School, and Blockhouse Point.

Level of Service: Level of service was addressed in the PROS Plan, as well as Vision 2030, and was measured for specific geographies used in land use and community plans. The Level of Service (LOS) analysis of the parks and recreation inventory shows that when population density is considered, the current overall LOS per capita is lower inside the Washington DC Beltway and up the I-270 corridor (indicated by the lighter shades in the South Central and North Central sub-areas in Figure 4.3.2). The increased growth projected in the next twenty years along the I- 270 corridor will create increased demand for parks and recreation facilities and services. The largest growth in next 20 years is projected to be in the North Central and South Central subareas.

Figure 3.3.2- Vision 2030 Perspective A- Access to All Components



Level of Service per Population by Sub-area

Due to the size and diversity of the County, the Vision 2030 process projected park and recreation needs in four geographic sub-areas of the County: Potomac/Rural, East Transit Corridor, South Central, and North Central.

The Level of Service (LOS) analysis of the parks and recreation inventory shows that when population density is considered, the current overall LOS per capita is lower in the I-270 corridor (indicated by the lighter shades in the South Central and North Central sub-areas on this map).

The increased growth projected in the next twenty years along the I-270 corridor will create increased demand for parks and recreation facilities and services.

SOURCE: 2012 PARK, RECREATION, AND OPEN SPACE PLAN (PROS)

Table 3.3.1- Level of Service

Perspective A: Access to All Components

SUB-AREA	Percent of Area With LOS	Average LOS Per Acre Served	Percent Total Area Above Threshold Score (67.2)	Avg LOS Per Acre Per Pop Per Acre	GRASP® Index
Montgomery County	100%	710	100%	238	23
Potomac / Rural	100%	415	100%	592	34
East Transit Corridor	100%	1,136	100%	270	24
South Central	100%	1,101	100%	117	22
North Central	100%	940	100%	157	18

SOURCE: 2012 PARK, RECREATION, AND OPEN SPACE PLAN (PROS)

Table 3.3 above shows Vision 2030 statistics derived from Perspective A- Access to All Components for the County as a whole and the sub-areas of Perspective A. For each column, the highest value is shown in dark green and the lowest value is shown in light green.

The table illustrates that 100% of the County is covered with at least some service, meaning that the GRASP score for every location within the County according to this Perspective is greater than zero. Even the Potomac/Rural sub-area has 100% coverage. The average GRASP Level-of-Service score per acre for all acres with service across the County is 710 points. This number represents the average GRASP score for all of the areas within the County. The highest average LOS per acre served score is in the East Transit Corridor, indicating that area has the highest concentration of components. The East Transit Corridor has the highest population of all subareas, so providing the most components in the East Transit Corridor makes sense.

See Appendix C for full listings of facilities in each PROS area.

3.4 PLANNING DOCUMENT PRIORITIES

Within the planning documents, of primary interest to the ADA barrier removal effort and construction project planning are the categories of public interest, and the ranking of those areas of interest.

As part of the Vision 2030 report process a public survey was undertaken. A statistically valid mail survey called the "IMPORTANCE OF FACILITIES TO YOUR HOUSEHOLD" survey was conducted during May and June 2010. A total of 8,164 County residents were mailed the survey. Response to the random sample was 555 respondents; 400 were needed for statistical validity. The survey results yielded the categories of facilities which the public rated as the five top priorities for expansion and improvement:

- Community recreation centers
- Indoor aquatic centers
- Playgrounds
- Trails
- Natural Areas

Vision 2030 drew conclusions from the public outreach efforts, which were part of the report process.

- Improve existing facilities over building new ones
- Trails and natural areas are highly valued
- Athletic fields— public preference for rectangular fields over baseball/softball diamonds: identify opportunities to convert some of the diamonds strategically "Down County"
- Community gardens are becoming increasingly popular
- Playgrounds— continue to be among the most popular facilities
- Historic sites— concentrate on top priorities

The results of a statistically valid public survey conducted as part of the Vision 2030 analysis and included in the 2012 Park, Recreation, and Open Space (PROS) Plan, ranked the three most important Parks Department amenities. The list below summarizes the results of those amenities ranked as "top priority," exclusive of amenities such as swimming pools and recreation centers, which are under the purview of other agencies, or amenities ranked a very low priority overall by the survey respondents. The rankings, from highest to lower "importance of facilities to you and your household," are as follows:

- Hard surface trails
- Natural trails
- Natural areas
- Playgrounds
- Picnic Shelters
- Outdoor aquatic centers (splash ground feature)
- Outdoor tennis
- Historical/archeological features
- Soccer, lacrosse, softball fields

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- Ice rinks
- Outdoor basketball courts
- Dog parks
- Indoor tennis
- Baseball fields
- Softball fields
- Equestrian centers
- Skateboard parks

Using the results of the public outreach efforts for ranking of barrier removal helps target those amenities rated highly by the general public. In addition, the CIP planned design and construction projects add additional levels of decision criteria, where ADA barrier removal can be integrated with the design and construction documents for renovation of existing facilities or new construction.

Note to reader: In 2016 and 2017, the PROS Plan will be reviewed, and revised as part of its standard update cycle. The 2017 PROS Plan will incorporate aspects of the 2016 FTP into the planning document. It is equally true that the findings and conclusions reached in the final 2017 PROS Plan may alter or influence the strategy, parameters, and/or criteria used in this Final Transition Plan. This is to be expected; the FTP is a living document and is subject to change as the result of public input, changes in priorities, and/or the results of the 2017 PROS Plan (and beyond), amongst other factors and influences.

4 M-NCPPC MONTGOMERY PARKS ADA PROGRAM INITIATIVES

Montgomery Parks has initiated many new programs, policy developments, physical and programmatic improvements, trainings, communication and website upgrades, amongst many other efforts to improve accessibility in its system, which are further described and expanded below.

4.1 INITIATIVES

Subsequent to the 2011 Settlement Agreement, M-NCPPC Montgomery Parks has reviewed and updated many policies with regard to its ADA compliance. This effort is ongoing and will continue well into the future. The Parks Department has taken a number of steps towards achieving optimal accessibility in accordance with the Settlement Agreement and the applicable ADA regulations and codes. As a result, in many areas of providing accessibility, the Department has made significant progress in the last several years:

- Departmental-wide ADA policy has been evolving, with the goal of incorporating the overall ADA strategy into everyday operations.
- ADA policy reviews have been cycled into the periodic Department policy reviews.
- Policies for ADA compliance in leases, vendor permits, and park usage permits are under consideration and have been enacted in new leases.
- Provided training sessions to approximately 90% of its employees including various topics such as disability awareness, generalized training on ADA issues, operations and maintenance requirements, ADA design issues, playgrounds, and targeted groups such as supervisory, operations and maintenance staff.
- The evaluations of all park facilities were completed within the past year.
- Coordination with M-NCPPC Prince George's County Parks and Recreation, Montgomery County Department of Recreation, Montgomery County Planning, and Montgomery County Department of General Services has significantly expanded.
- Public outreach related to accessible programs, upcoming projects, and facilities has been initiated and is ongoing.
- Two Level-of-Effort Capital Improvement Program projects were created to fund various ADA related activities.
- A Department-wide ADA Implementation Team was created with representatives from all divisions.
- A Senior ADA Compliance Project Manager position and an ADA Compliance Project Manager position have been filled within the Park Development Division to oversee the Self-Evaluation process and Transition Plan development as well as other ADA-related activities and initiatives. They are also responsible for the on-going physical access improvements within the Montgomery Parks system
- A Program Access Office consisting of a Countywide Program Access Coordinator and a Program Access Specialist has filled to develop inclusion policies, review programs, and provide accommodations, employee training, and outreach, to both internal and external customers.
- An ADA Facilitator position has been created within the Facilities Management Division to coordinate work program activities, EBR removals, oversee trade staff, and document barrier removals.
- ADA consultation on plan reviews for all new and ongoing design projects began in 2012.
- Montgomery Parks has also initiated programs to ensure that recent park renovations, new construction, and maintenance operations incorporate ADA requirements into each related activity.
- Improvements to 18 of the 19 parks audited by DOJ have been completed as of August 2016; additional improvements to numerous other parks have also been completed (see Section 4.7). The final park (19th) will be completed in late 2016/early 2017.
- An ADA database, AssetCALC™, an online interactive database, was utilized to manage ADA information. The AssetCALC™, asset data has subsequently been transitioned into the M-NCPPC Montgomery Parks' new SmartParks/EAM management system.
- A park amenity accessibility ranking system has been developed. Each ADA evaluated amenity is ranked by its level of accessibility into one of the following categories: Fully Compliant, Generally Accessible, Accessible with Limitations, or Not Accessible. The goal of Montgomery Parks is to inform the public regarding the location and rating of various accessible amenities and facilities. Ultimately, this data will be incorporated into the Parks website.
- M-NCPPC initiated a review and summary of its various camps and programs in order to assess future needs relative to its Title II obligations.
- The Montgomery Parks staff has initiated an ongoing coordination effort with the Commission of Peoples with Disabilities (CPWD), including presentations in April 2014, April 2015, and February 2016 regarding the Parks design and construction processes, progress on ADA initiatives, barrier removal strategies respectively. A member of the Parks staff will also be added as an ad hoc advisor to the CPWD subject to County approval.

- An ADA Compliance Manual was specifically developed for and by Parks staff has been distributed to trades, design, and operations staff for construction, repairs, and maintenance of ADA related facilities. This manual will be reviewed and updated on a continual basis as needed.
- The Department has initiated a process to monitor and oversee its partners to ensure their programs and websites comply with the ADA

In addition, Montgomery Parks has well-established community garden programs in eleven locations throughout the County. One additional program location is scheduled. The HFEE Division, which runs the community garden program, has provided, and is continuing to provide, services to various disability groups such as:

- Provided a raised-bed garden plot to a community services organization as part of its Autistic Adults and Children Program at the South Germantown Community Garden
- Provided three additional garden plots to a non-profit organization which provides housing and other services to individuals with disabilities.
- Provided two garden plots at Parklawn Community Garden to a rehabilitation facility, which specializes in traumatic brain injury, in Rockville.

One of Montgomery Parks tenants, an independent non-profit organization, coordinates the “Parks and Gardening for People with Disabilities” program at the Red Wiggler Community Farm, which is part of Ovid Hazen Wells Park. The program was founded in 1996 as a non-profit horticulture therapy and vocational training program for adults. The Therapeutic Horticulture Program of the Montgomery County Master Gardeners and the 4-H organization sponsors a garden for children with autism, as part of the Demonstration Garden at the Agricultural History Farm Park.

4.2 PUBLIC OUTREACH

In June 2013, M-NCPPC Montgomery Parks, in conjunction with Montgomery County, the Commission on Peoples with Disabilities (CPWD), and the Countywide Recreation Advisory Board, held a public outreach meeting to solicit public input on the strategies and direction of ADA implementation. This initial meeting was attended by members of M-NCPPC Montgomery Parks, the Commission on People with Disabilities, the Countywide Recreation Advisory Board, and the public; approximately 60 people were in attendance. M-NCPPC Montgomery Parks outlined the ADA and the 2011 Settlement Agreement, and sought initial input on a variety of topics, including strategies for retrofits, and access priorities. The M-NPCC Montgomery Parks requested public input on an ongoing basis. The public was provided contact information including e-mail addresses, phone numbers, and website information to initiate this effort.

Based upon preliminary polling at the meeting, it was recommended that M-NCPPC Montgomery Parks distribute its accessibility efforts rather than concentrate its work efforts in several locations or areas. Additionally, an “outside in” approach (from park boundary to parking to accessible routes) was favored in lieu of an amenity first approach. High priorities were given to restroom facilities, public transit, and distance of travel.

In conjunction with the June 2013 meeting, Montgomery Parks also established phone line (301) 650-2885 and an e-mail address, adacompliance@montgomeryparks.org, to enable the public to provide feedback, ask questions, and offer suggestions on a continuing basis.

Several presentations have been made to the CPWD since 2014 to solicit responses and additional input on the Park design and project development process. One of the primary purposes was to develop an interactive mechanism to allow additional input by the disability community on a wide range of Park projects – from park renovations to smaller renovations. One of the proposals which seemed to generate a lot of support was the idea of an advisory group consisting of various disability organizations to act as a review/coordination group to the CPWD and M-NCPPC Montgomery Parks.

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In June 2014, M-NCPPC received a positive response to a request to Montgomery County Public Schools (MCPS) for a partnership to create an opportunity for MCPS Autism Spectrum Disorders Services to collaborate with M-NCPPC Montgomery Parks. This collaboration will enable training opportunities for staff as well as to provide better experiences for students in the various summer camp programs in the parks.

In April 2015, Montgomery Parks presented a newly developed ADA Compliance Manual to the Commission on People with Disabilities; this manual was specifically created for park purposes and was targeted for trade, operations, and design staff. The CPWD was also updated on the status of ADA compliance efforts and the strategy development for barrier removals. Both were well received by the Commission.

In February 2016, M-NCPPC presented to the CPWD the Transition Plan and ADA Strategy to make an accessible county-side park system. The Transition Plan was converted to a PPT that is easy to read and understand. The presentation, along with a public survey for people's perspective of the Parks system, were subsequently launched on Montgomery Parks' website for public's information and input. Comments and questions from the public are monitored on a regular basis.

M-NCPPC Montgomery Parks plans to continue working with other agencies in Montgomery County, with the Commission on People with Disabilities, and the Countywide Recreation Advisory Board, to promote citizen awareness, and receive user feedback about its programs and physical facilities related to accessibility.

Montgomery Parks is implementing new procedures to ensure the public is better informed about upcoming ADA projects, programs, and activities including mailings, website announcements, signage, and public meetings. Collectively, the intent is to inform and engage the public in park accessibility and program access improvements. In keeping with this initiative, an email address has been created for the public to communicate effectively with the Program Access Office. This tool allows the public to request modifications, support services, provide documentation and other important information for individuals with disabilities to participate successfully in Parks programs. The Transition Plan is posted at the Montgomery Parks' website for the public to view and to provide comments.

Additionally, various types of welcome language have been developed and are in use. Samples of public outreach language are listed below:

Abbreviated Version of Welcome Statement (for use on printed and electronic materials including social media, websites, and emails):

Montgomery Parks encourages the participation of individuals with disabilities. Contact the Program Access Office: 301-495-2477 | 301-440-0579 (TTY) | 7-1-1 or 800-552-7724 (MD Relay)
www.MontgomeryParks.org/access | ProgramAccess@MontgomeryParks.org.

Statement for the Program Guide:

Individuals with disabilities are encouraged to register for programs offered by Montgomery County Recreation and Montgomery Parks. To facilitate inclusion, you may request auxiliary aids or services. Interpreters, Braille or large print, or other modifications should be requested prior to the start of programs. Early notification allows time to put modifications in place. If you are registering for a Montgomery County Recreation program, contact a Therapeutic Recreation Specialist at 240-777-6870 or rec.mainstream@montgomerycountymd.gov. If you are registering for a Montgomery Parks program, call the Montgomery Parks Program Access Office at 301-495-2477 (Voice), 301-440-0579 (TTY), MD Relay 7-1-1 or 800-552-7724 or ProgramAccess@MontgomeryParks.org. Visit www.MontgomeryParks.org/access for more information.

Public Meeting Notices (for use on postcards and electronic materials):

Montgomery Parks encourages the participation of individuals with disabilities. Contact the Program Access Office: 301-495-2477 | 301-440-0579 (TTY) | 7-1-1 or 800-552-7724 (MD Relay)
www.MontgomeryParks.org/access | ProgramAccess@MontgomeryParks.org.

4.3 COMMUNICATIONS

The Title II regulation of the Americans with Disabilities Act requires that all types of communication methods used by the Parks Department also be available to people with disabilities. Many people with vision impairments use websites every day with the aid of technical equipment. Montgomery Parks revised its website several years ago, and made changes so that it can be read by special equipment for the visually impaired.

An ADA webpage was created to fit the needs of many and varied users. The ADA page of the official Maryland National Capital Park and Planning Commission website, <http://www.montgomeryparks.org/about/ada.shtm>, is dedicated to the ADA activities of Montgomery Parks. The website provides:

- Announcements of community meetings which are held to assess public interest and gain public input for ADA planning efforts
- Information on the multi-year Self-Evaluation and Transition Plan development effort which will result in a plan to improve accessibility
- Answers to typical ADA questions about park facilities
- A list of parks with accessible facilities
- Links to significant ADA websites, such as the ADA 2010 regulations and the 2011 DOJ Settlement Agreement
- Announcements about upcoming ADA projects containing information about schedule, general projects description, status of the projects and impacts to park users
- A new information page has been dedicated to Program Access including a list of accommodations that are available to individuals with disabilities as indicated by the ADA; the process of requesting an accommodation as well as the ADA non-discrimination policy set forth by the M-NCPPC.

However, Montgomery Parks recognizes that more needs to be done to improve website accessibility. The Montgomery Department of Parks, the Montgomery County Planning Department and the Montgomery County Planning Board, referred to collectively as the "entities," are redesigning and redeveloping each of their respective websites to address challenges associated with each entity's online presence. This project will result in a completely redesigned and redeveloped online presence for all three entities and will help brand them as part of the overall Maryland-National Capital Park & Planning Commission. People with disabilities will be a part of the user experience testing prior to the launch date. The sites began to come online in early August, 2016, when the Parks site launched. The Planning and Board sites will launch within a month after the Parks site goes online.

Furthermore, using an ADA-compliance testing tool, the Parks Department realized that their third-party registration software is non-compliant. The department worked with ActiveNet to plan for the software upgrades needed to become compliant. The ActiveNet team will begin the work as of July 2016 to ensure incremental fixes are done in their monthly software releases until all issues are resolved by March 31, 2017.

The Parks Department also gave notice to our community partners to bring their websites and other marketing efforts into ADA compliance. The partners are tasked with providing the Parks Department their plans and schedule for compliance by the end of 2016.

Montgomery Parks' web presence is pivotal to ensuring that Montgomery County residents have easy access to information they need about planning efforts and initiatives, parks, facilities, trails, programs, events, public meetings, construction projects and more. Each agency has robust outreach and public engagement needs and utilizes the web to inform and engage with its residents.

Each site currently lacks sufficient ADA/508 compliance, a streamlined process for updating content, and -friendly navigation and interactivity. All three websites have been or are in the process of redesign to facilitate the following:

- Improved access to information
- Improved responsive design to support mobile device use
- Reduction in size/volume of materials, pages, etc.
- Better architectural / navigational design
- Compliance with accessibility guidelines

- Clearly defined content management, governance, maintenance process and procedures

The intent is as follows:

- More user-friendly and usable site architecture and navigation system(s)
- Homepages that are intuitively designed around sought after information
- Sites that are easily viewed and read on mobile devices
- Clear strategy and streamlined infrastructure to develop and maintain website
- Sites that meets ADA compliance initiatives

Under consideration for the new website is an accessibility rating system for amenities that may be used both in written communications, such as the website, and for phone inquiries. Each ADA audited amenity has been classified by its level of accessibility into one of the following possible categories: Fully Compliant, Generally Accessible, Accessible with Limitations, or Not Accessible. It is hoped that the rating system may provide beneficial information to the public regarding accessible amenities. This information will be added to the website after the SmartParks/EAM database is fully integrated with GIS. and The website. Integration is expected within the next four to five years.

Department publications are an important tool for park users. Future brochures which will be made available to the public can be used to communicate about accessibility. Park brochures will be revised to highlight accessibility work that has been completed, or to indicate which parks contain accessible amenities, such as picnic areas or playgrounds. Accessibility updates will occur on an ongoing basis as the brochures themselves are updated.

4.4 TRAINING PROGRAMS

Subsequent to the adoption of the 2010 ADA Standards and the requirements of the Settlement Agreement in 2011, training programs were created and updated with the goals of achieving Parks-wide awareness while tailoring specific training to various staff functions. Generally, initial training efforts between 2012 and 2014 focused on overall ADA awareness, design and construction standards, and maintenance concerns. In 2015, the Program Access office initiated a number of training programs for all Department staff.

Ongoing targeted employee efforts have included numerous initiatives, such as modifying Parks design standards to incorporate the recent 2010 ADA Standards changes, shadowing of ADA self-evaluation teams by Parks staff in 2012, and ensuring construction compliance through ongoing construction manager and inspector training. Design staff has received specific training in various aspects affecting the design of ADA improvements; additionally, staff has coordinated with consultants on various projects as a training tool on a project by project basis. Final construction plans are reviewed by the Senior ADA Compliance Project Manager or ADA Compliance Manager, as well as external consultants, for conformity with the ADA standards as well as for constructability. As a matter of policy, all projects are assigned an in-house ADA reviewer as part of the project development process.

Additional trainings/presentations were provided for various program staff as follows:

- January 2013 - Parks-wide training sessions for 600+ employees were conducted to provide overviews and insight into Title II, ADA requirements, the Settlement Agreement, personal communication “rules”, and other issues.
- August 20, 2013- Montgomery Parks and its consultant held a training session for staff from the Northern Maintenance Areas and Facilities Management, as well as staff from other divisions.
- October ,2013 - Selected staff attended an Inclusive Play Training workshop in September as well as Playground Training for maintenance and design staffs.
- February 12, 2014 – Approximately 150 employees attended training to learn basic American Sign Language and how to interact respectfully and effectively with people with hearing disabilities. February 25, 2014 – ADA and Disability Awareness Training conducted by M-NCPPC Prince George’s Inclusion Services for the Horticulture, Forestry, Environmental Education (HFEE) Division and Enterprise Division managers
- March 24, 2014 – Autism Awareness presentation conducted by Ivy Mount staff for HFEE Division and Brookside Gardens and Nature Center managers and staff

- June 2, 2014 – ADA and Disability Awareness Training conducted by Montgomery Parks staff for HFEE Division and Brookside Gardens and Nature Center managers and staff
- July 2014 - A training session was conducted by Montgomery Park's consultants on ADA Access for Maintenance and Operations staffs. The purpose of the sessions, attended by over 150, was to develop awareness and guidance on ADA operations and maintenance requirements on an ongoing, regular basis as well as to give staff the tools needed to recognize issues in the parks and facilities.
- March 2015 - ADA Compliance Manual was released for use by various design staff, trades, operations, and facility management staff for most installations undertaken by M-NCPPC in parks.
- May 2015 - Selected camp staff attended a countywide Program Access/Inclusion training in Prince George's County; the training included topics such as behavior management, documentation, communication, and disability characteristics.
- Spring, 2015 - More than 120 supervisors attended awareness sessions on recruiting, hiring, and employment requirements under ADA; reasonable accommodation and the Commission's commitment to inclusion

Additionally, the Program Access Office has developed a significant and ongoing training curriculum for Parks staff. Trainings and descriptions include:

- **The ADA and Program Access:** a 4-hour training for career/full-time staff that presents an overview of the ADA including the 5 titles, practices, updates and compliance; Program Access operating procedures, guidelines, disability and sensitivity awareness, customer service and adaptation experiences;
- **Disability Characteristics:** a 2-hour training for part-time/seasonal Support staff and Program staff that presents an overview of intellectual and developmental disabilities;
- **Sensitivity Awareness:** a 2-hour training for part-time/seasonal Support staff and Program staff to instill a heightened awareness of disability challenges through hands on experiences and role play;
- **Communication & Documentation:** a 2-hour training for part time/seasonal Support staff to develop objective and accurate communication skills to successfully communicate with the disability community, staff, parents and guardians including oral and written practices;
- **Customer Service: Working with Persons with Disabilities:** a 2-hour training for part-time/seasonal Support staff and Program staff to instill/enhance skills in consistent high quality care, attention and assistance to all consumers;
- **Behavior Management:** a 2-hour training for part-time/seasonal Support staff to develop appropriate and socially acceptable expectations in a realistic plan for individuals to be productive and successful in our programs.

Trainings are offered year-round and are mandatory for all Parks employees. Since November 2015, the Program Access Office staff has trained and educated over 685 employees in the Parks system. (Education and training power points and manuals are available for all Program Access trainings upon request.)

An important ongoing and future training component for technical and non-technical staff will be webinars offered by such agencies as the US Access Board, Mid-Atlantic Training Center, and others. Selected staff will also attend yearly ADA Update Conferences sponsored by the Mid-Atlantic ADA Center and others. Montgomery Parks will continue to move forward with training initiatives, which go hand-in-hand with its ADA policy review program, and continue to educate its staff in the needs of individuals with disabilities and the requirements of the ADA regulations.

4.5 PROGRAMS, CLASSES, AND SERVICES

For governmental agencies such as M-NCPPC Montgomery Parks, Title II, Chapter 35.105- the Self-Evaluation requirement, imposes a duty to investigate the services, policies, programs, and practices that it offers to the public. Heretofore, and in previous Interim Transition Plans, the primary considerations were focused on facility access and the physical offerings provided by the park system at recreational amenities such as ball fields, tennis courts, and playgrounds. In the past year, Montgomery Parks has significantly increased its focus on Program Access and its impact on the organized programs and services offered to its residents. Program Access is further defined and addressed in Section 4.6.

Based on preliminary surveys conducted by in-house staff, it was determined that most of the organized opportunities offered by the park system are broadly concentrated in three areas: nature centers and public gardens; Enterprise camps/lessons, such as ice skating and tennis; and volunteer efforts. Other camps include archeological and historic themes on a smaller scale than the aforementioned.

Accordingly, a survey of the various camps and services that are offered was initially performed in 2014 and has been updated in subsequent years. A summary of the offerings is provided below. Table 4.5.1 lists the various participation levels at the nature centers and public gardens.

Table 4.5.1- Program Participation in Nature Centers and Public Gardens

NATURE AND GARDEN PROGRAMS	SUMMER 2013	FALL 2013	WINTER 2013-14	SPRING 2014	SUMMER 2014
Black Hill Nature Programs	65	40	33	72	97
Brookside Gardens*	30	57	37	42	18
Brookside Nature Center	44	37	44	27	58
Locust Grove Nature Center	21	36	31	43	10
Meadowside Nature Center	42	63	79	84	75
Totals	202	233	224	268	258

*Brookside Gardens programming for 2014 and 2015 was impacted by ongoing construction projects

The totals in Table 4.5.2 reflect special event & camp offerings at the listed facilities. Participants range in age from youth to adult.

Table 4.5.2- Festivals and Special Events at Nature Centers and Public Gardens

FESTIVALS AND SPECIAL EVENTS	SUMMER 2013	FALL 2013	WINTER 2013-14	SPRING 2014	SUMMER 2014
Black Hill Nature Programs	Summer Camps - 11	Monarch Fest Harvest Fest (All Parks)	Waterfowl Fest	Bluebird Fest	Summer Camps - 10
Brookside Gardens**	Wings of Fancy Summer Camps - 4	Children's Day	Garden of Lights		Summer Camps - 4
Brookside Nature Center	Summer Camps - 14*	Apple Fest Emancipation Days	Solstice Maple Sugar Fest	Forest Friends Fest Maryland Master Naturalist Program	Summer Camps - 8
Locust Grove Nature Center	Summer Camps - 7	Nocturnal Neighbors Fest Fruit Flies Fest Cider Days	Solstice	Save the Frogs Day	Summer Camps - 8
Meadowside Nature Center	Summer Camps - 13*	Pawpaw Fest Apple Fest Owl-O-Ween	Solstice	Egg Hunt Raptors Rule Festival	Summer Camps - 14*

* Number includes one and two-day Merit Badge courses

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** Brookside Gardens programming for 2014 and 2015 impacted by construction projects

Other programs offered are:

- Birthday Parties
- School Groups
- Private Groups
- Raptor (Birds of Prey) Programs (MNC)
- Paddle programs & Pontoon tours (BHNP, MNC)

Table 4.5.3- Rentals at Event Centers (2015)

EVENT CENTERS	BUSINESS RENTAL	SOCIAL RENTAL	WEDDING RENTAL	OPEN HOUSE	RETREATS
Lodge At Little Seneca Creek	44	14	61	0	0
Rockwood Manor	84	36	6	16	21
Woodlawn Manor	2	1	58		

The totals in Tables 4.5.4 through 4.5.10 reflect individual programs, camps, classes, clinics, rentals, and general admission at the listed facilities. Participants range in age from youth to adult.

Table 4.5.4- Program Participation in Sports Facilities (2015)

PROGRAMS	CLASSES FOR CHILDREN	ADULT CLASSES	CAMPS	LEASED ICE/ RENTED SPACE	PARTIES/ MEETINGS	PUBLIC SKATING
CABIN JOHN ICE RINK	1191	145	51	2331	199	103,122 Annual Attendance*
WHEATON ICE ARENA	529	37	47	1235	146	45,559 Annual Attendance*
WHEATON SPORTS			2	1131		
PAULINE BETZ ADDIE TENNIS CENTER	550	195	10	953 rentals 4653 spot time		
WHEATON INDOOR TENNIS	572	101	10	403 rentals 3988 spot time		

*Annual attendance for Public Skating includes children, adults, weekend/holiday, and discounted.



Table 4.5.5- Boating Rentals (2015)

BOAT RENTAL CENTERS	HOURLY	DAILY	BOAT PERMIT-DAILY	BOAT PERMIT-SEASONAL	MOORING SITE-SEASONAL
Black Hill	16,093	343	4,001	149	110
Needwood Lake	4,730	59	180	23	11

Table 4.5.6- Camping Rentals (2015)

CAMPING RENTALS	SITES	CAMPER READY EQUIPMENT
Little Bennett	2874	37

Table 4.5.7- Skate Park Activities (Now open to the public; figures below reflect 2014)

SKATE PARK ACTIVITIES	CLASSES	CAMPS	DAILY ADMISSION	MEMBERSHIP
Olney Manor	1	7	1479 Annual Attendance	198

Table 4.5.8- Train and Carousel Activities

TRAIN AND CAROUSEL	TICKETS	"HAUNTED" TICKETS	PARTY ROOM RENTALS
Train – Cabin John	50,333	7,249	115
Train & Carousel – Wheaton	171,661	3,829	168

Table 4.5.9- Splash Park and Mini-Golf Attendance and Rentals

SPLASH PARK and MINI-GOLF	ADMISSION	RENTALS
South Germantown	44,011 Admission	282

Table 4.5.10- Driving Range Activities

DRIVING RANGE	CLINICS	CAMPS
South Germantown	159	19

M-NCPPC Montgomery Parks has a very active Volunteer Services Office (VSO), which oversees the recruitment, coordination, and training of volunteers to augment and supplement paid staff in various functions throughout the park system. This program has been highly popular with the community and integral to the success of Montgomery Parks. In fiscal year 2014, Montgomery Parks engaged over 13,000 people in 208 different volunteer jobs throughout the organization. M-NCPPC Montgomery Parks “accepts and encourages the involvement of volunteers at all levels and within all appropriate programs and activities. Volunteers are accepted on a pro-active basis, with the intent of broadening and expanding the volunteer involvement with the community. Volunteer applications are considered without regard to gender, disability, age, race, or other condition. The primary qualification for volunteer application acceptance shall be suitability to perform a task on behalf of the agency in accordance with same rules and policies for all volunteers.” As such, the VSO and its activities as a whole are consistent with the goals of the ADA. It is important to note that most volunteers require a training program to assist them in performing their duties and responsibilities effectively.

M-NCPPC Montgomery Parks must, as required by Title II, evaluate its various policies to ensure that discrimination on the basis of disability does not occur. Evaluations conducted to date have found that numerous policies currently do exist and are promulgated by the entire Commission (for all departments and divisions within Montgomery County and Prince George’s County). Title I employment policies are already in place, as well as various workforce policies which prohibit discrimination on the basis of disability.

4.6 PROGRAM ACCESS

The Program Access Office was launched in February 2015. Currently, there are two (2) full-time career staff that work in the office. This team has extensive knowledge in the field of Therapeutic Recreation and Special Education with years of professional experience.

4.6.1 PURPOSE AND FUNCTION

The function/purpose of the Program Access Office is to:

- Coordinate and manage reasonable modifications for individuals with disabilities to be successfully included in county-wide parks, recreation and leisure programs. Reasonable modifications provided are:
 - **Trained Support Staff:** seasonal/part-time paid staff that shadow/support an individual with a disability or shadow a small group of individuals with disabilities in programs
 - **Companions:** volunteers that support individuals with disabilities. This may also include family members, personal care providers, and other supporters
 - **Adaptive equipment:** for program participants who need specialized equipment that assist with successful program participation
 - **Braille, large print materials:** for program participants who are blind or have low vision
 - **Audio Description:** for program participants who are blind or have low vision
 - **Assisted Listening Devices:** for program participants who are deaf or have hearing loss
 - **Sign language interpreters:** for program participants who are deaf, have hearing loss and/or are non-verbal
- In cooperation with the ADA Access Team, monitor, research and interpret the ADA, ensuring that the Department is in compliance
- Develop and implement policies and procedures for employees to follow to ensure ADA compliance
- Educate, train and act as a resource for staff and the public on disability issues and reasonable modification

4.6.2 MISSION AND VISION

In keeping with the mission of the Department of Parks, the Program Access Office ensures individuals with disabilities are welcomed to participate in enjoyable leisure-time activities in accessible places and programs. The vision of the Program Access office is as follows: Individuals will be afforded respect and dignity while pursuing their desire to enhance their quality of life in a clean, safe, and accessible setting.

4.6.3 OPERATING PROCEDURES AND STRATEGIC PLAN

The Program Access Office has developed and follows Standard Operating Procedures (SOP). The SOP document is in place to ensure that Office business is conducted with a high standard of professionalism and dignity. (See Appendix J, Part 1 for the SOP). A strategic plan, (available upon request), includes 5 topics and action plans, and is used as a guideline to ensure that actual work program initiatives are developed and updated in an efficient and timely manner. Those topics include:

- **Administration and Programmatic Influence:** ADA compliance and accessibility in programmatic settings
- **Education and Training:** curriculum development and education
- **Fiscal Management:** budget development and fiscal responsibility
- **Personnel Management:** recruiting, hiring, training, supervising and evaluating quality support staff
- **Public Relations/Marketing:** development and maintenance of a marketing plan including community outreach and advocacy. (See Appendix J, Part 2 for Marketing Plan).

Administrative and Programmatic Influence

The Program Access Office researches, develops and recommends Departmental procedures and policies to ensure access in programs. The Office also works cooperatively with the M-NCPPC Corporate Office to ensure Commission-wide Practices and Policies are being followed by distributing these important documents to all Parks staff, ensuring they are visibly posted in facilities and educating staff in these practices.

In 2015, the Program Access team partnered with the Montgomery County Recreation Department, the City of Rockville Recreation and Parks Department and the City of Takoma Park to plan and implement a county-wide ADA 25th Anniversary Celebration. This free community event was held on November 8, 2015. All programs were inclusive and included an interactive basketball demonstration by a former Harlem Globetrotter team member; DJ and dancing; arts, crafts, games and nature programs; sensitivity awareness programs; companion and therapy dog clinics; refreshments and giveaways.

April is Autism Awareness/Acceptance month. During the month of April 2016, the Program Access team developed and implemented a "Light it Up Blue" event, promoting and educating Parks staff in Autism acceptance and awareness. Ice rinks offered a "Blue Skate" with discount skating fees, rentals, special snack bar items, and distributed glow in the dark necklaces while Program Access staff was on the premises educating participants on autism awareness and acceptance.

The Program Access Office has recommended ideas and suggestions to increase accessible amenities and inclusion in park and facility settings. In cooperation with the PROS (Parks and Recreation Open Space) Plan team, the ADA Access team has submitted a number of suggestions which are outlined in Section 6.2:

The Program Access Office in conjunction with the ADA Access Team and the Parks Planning and Stewardship Division are also working as a I team, partnering with the World Health Organization (WHO), AARP, local Montgomery County agencies and others to assist in the implementation of the WHO Global Age-Friendly Cities initiative for the aging population which are further described in Section 6.2

Education and Training

The Program Access Office researches, prepares, develops and conducts specific appropriate educational trainings for all career/full time staff, contractual staff, non-career seasonal staff and volunteers. The trainings and sessions offered by the Program Office team were previously outlined and described in Section 4.4

Personnel Management

The Program Access team recruits, hires, educates, supervises and evaluates individuals who have experience or an interest in Therapeutic Recreation, Special Education or related fields to become employed as a seasonal/part-time trained Support Staff or Volunteer. All employment positions are posted on the M-NCPPC website. The office is notified by the M-NCPPC Recruitment and Selection Office via email of an applicant. Once an applicant is referred to the Office, staff will review the application, and if they are qualified, an interview is conducted. If selected as Support Staff, new employees receive the Program Access core training including:

- MNCPPC and Montgomery Parks Orientation
- Program Access Operating Procedures
- Disability awareness
- Sensitivity awareness
- Customer Service and Working with Individuals with Disabilities
- Communication and Documentation
- Behavior Management

To uphold the integrity and quality of prospective employees, the Program Access team works cooperatively with the Prince George's County, Department of Parks and Recreation, Therapeutic Recreation and Inclusion Services Section staff to develop and update personnel position descriptions, qualifications, and pay rates. Together this team is currently reviewing all seasonal Program Access, Inclusion and Therapeutic Recreation positions and updating them as appropriate.

Public Relations/Marketing

Since Program Access is a relatively new office within Montgomery Parks, marketing and promotion is vital and plays a critical role in the success of providing services to the public. To ensure this success, a Marketing Plan was developed in cooperation with the Public Affairs and Community Partnerships Division (PACP) of Montgomery Parks (see Appendix J, Part 2) and updated as necessary. Included in that Marketing Plan are the following topics:

- **Print Materials:** informational rack cards and posters were developed and distributed to all Parks facilities and offices, local businesses, schools, community organizations, etc. to promote Program Access services and contact information. The **Guide to Parks** is a seasonal catalog containing all the parks programs, class schedules, activities, festivals and informational services for the general public to register and participate in leisure programs. The Program Access Office is highlighted throughout the Guide on several pages for public information.
- **Technology:** Montgomery Parks website (www.montgomeryparks.org) hosts an Access information section where the public can view information regarding reasonable modification services, ADA transitional plans, accessible parks and amenities. The current website is currently in the process of being upgraded which will include ADA compliance enhancements. *ActiveMontgomery* is a software used by Parks in which the public can create an account and easily register for Parks programs on-line. At the link for ADA/accessible services requests for reasonable modifications can be placed. The Access team is also in the process of developing an informational e-letter entitled "Passages" which will be distributed quarterly via e-mail to internal staff. The e-letter will include ADA updates and accessibility information; Advocacy: Program Access Office staff serve as advocates for individuals with disabilities and promotes access in our Parks programs and facilities. Staff also work cooperatively with the public including self-advocates, parents/guardians and others to advocate for disability services when budget restraints exist. This may include researching and developing testimonials to present at county budget hearings, written communication to elected officials, and more. The Office will also work with the Department's Foundation Office (a 501c-3) which can assist in developing an advocacy platform to enhance funding sources for access services.
- **Public Relations/Outreach:** Community fairs and events are key in promoting services and connecting with the community. The Program Access Office has participated in resource and community fairs including:
 - Infants and Toddlers Resource Fair, July 2015
 - Summer Day Camp Expo, March 2016
 - "Light it Up Blue" Autism Awareness month events, March and April 2016
 - Bring Your Child to Work Day, April 2016
 - Autism Walk and Resource Fair, Cloverly Elementary School, April 2016
 - Autism Night Out Fair, Montgomery County Police Law Enforcement, May 2016
 - Community Conversation Resource Fair, City of Takoma Park, June 2016

The office staff are members of the Montgomery County Arc and the Montgomery County Commission on People with Disabilities and attend their annual and monthly meetings where they have conducted informational presentations;

The Departmental Access Team is developing an internal electronic newsletter for staff entitled **Passages** which will contain updates about the ADA, progress in programmatic and physical access in the parks system and related information to keep Parks staff informed.

Program Access information, updates and service opportunities are developed and made available to elected officials including the Montgomery Parks Planning Board and Montgomery County Council in the Department's **Semi-Annual Reports** which are coordinated and presented in the Fall and Spring seasons to both governing Boards by the Director of Parks.

4.6.4 PARTICIPANT AND SERVICE LOGISTICS

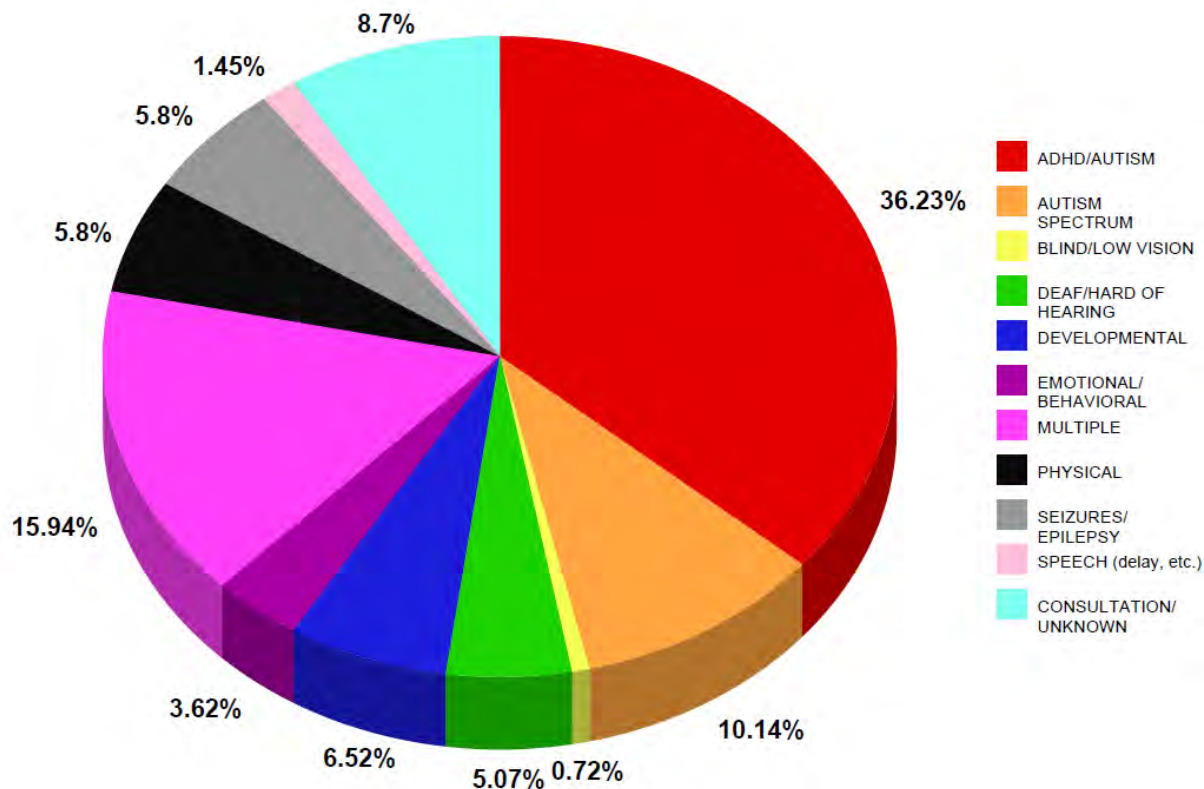
Since April 2015, one hundred and thirty-eight (138) individuals registered for programs were identified as having a disability. Of those, forty-one individuals (41) received direct support services requiring trained support staff to provide modifications/assistance, thirty-two (32) participants required indirect services (staff re-directed a participant's behavior or actions or made indirect modifications, etc.), and sixty-five (65) participants were identified as having a disability but did not require support services. The Program Access Office staff was contacted as a resource to assist staff with disability issues. These numbers are based upon the information provided on the individuals' profiles and received by the Program Access Office from program directors.

Disabilities Breakdown

The breakdown of individuals with disabilities who attended Parks programs and events are as follows:

- Attention Deficit/Hyperactivity Disorder (ADHD)/Attention Deficit Disorder (ADD) or other attention disabilities: 36.23% identified
- Autism Spectrum: 10.14% identified
- Blind/Low Vision: .72% identified
- Deaf or Hard of Hearing: 5.07% identified
- Developmental Disabilities: 6.52% identified
- Emotional/Behavioral: 3.62% identified
- Multiple disabilities: 15.94% identified
 - *This category was very broad as it included individuals with a wide range of social-emotional disabilities, physical disabilities, intellectual/cognitive disabilities and social disabilities.
- Physical Disabilities: 5.8% identified
- Seizures/Epilepsy: 5.8% identified
- Speech: 1.45% identified
- Consultation/unknown: 8.7%

Figure 4.6.4- Disability Distribution



4.6.5 QUALITY ASSURANCE

To ensure quality assurance, the Program Access staff conducts evaluations and surveys throughout the year to evaluate current services provided to our valued customers to ensure continuous improvement in our service delivery.

In addition, personnel evaluations are conducted to ensure that all Support Staff are in compliance with the ADA and are following accurate guidelines and procedures. Program Access Staff provide on-site visits to evaluate staff and review policies, procedures and provide additional training as needed. Staff are evaluated on their performance at the conclusion of their service. The Office has received several testimonials praising access services including support staff who provide exceptional service to individuals with disabilities.

4.7 PHYSICAL BARRIER REMOVAL PROCESS

M-NCPPC Montgomery Parks is making a concerted and sustained effort, through its CIP and maintenance programs and various other initiatives, to bring its parks and amenities into compliance with the ADA Standards. These projects vary in size from complete park renovations to parking space retrofits to accessible picnic table installations. In total, they reflect a major commitment by M-NCPPC Montgomery Parks to provide accessibility to the public and all individuals with disabilities. As an example, since 2011, the following park amenities have been made fully or partially compliant through these various efforts:

- Aberdeen Local Park – Various accessible route extensions to tennis courts and other amenities, parking upgrades (ongoing)
- Agricultural History Farm Park – accessible walkway near Bussard House

ADA TRANSITION PLAN

2016 FINAL SELF EVALUATION AND TRANSITION PLAN

[UPDATE OF 2015 INTERIM TRANSITION PLAN]

AUGUST 2016

EMG PROJECT NO.: 102516.12R000-00C.206

- Amity Drive Neighborhood Park – new park with playground, basketball court, shelter
- Arcola Local Park – accessible route, softball field
- Argyle Local Park – accessible parking and walkways to tennis courts, basketball court and playground, and various upgrades within the Public Activity Building
- Ayrilawn Local Park – accessible parking and access to softball field, playground, and tennis court
- Bauer Drive Local Park – parking spaces and access to tennis courts.
- Bedfordshire Neighborhood Park – renovated playground
- Big Pines Local Park – parking spaces and access to tennis courts
- Black Hill Regional Park – Black Hill Trail renovation (based on ABA Outdoor Developed Area trail guidelines), renovation of the accessible fishing pier
- Bauer Drive – access to tennis courts
- Blueberry Hill Local Park – playground renovation
- Bradley Hills Local Park – Renovated playground, access to community garden, and walkway
- Bradley Local Park – new accessible playground and walkways
- Brookside Gardens – accessible routes at Gude Gardens, Visitors Center and parking renovation
- Buck Branch Neighborhood Park – installation of ADA compliant parking stalls and accessible route to basketball court
- Burning Tree Local Park – installation of parking spaces, accessible routes to ball field, players benches and tennis court
- Cabin John Local Park – accessible routes installed to playground, basketball court, tennis court, parking, signage, picnic shelter, tables and grill
- Cabin John Regional Park – new entrance, access into Armstrong Cabin, new parking and shelter for campground
- Cabin John Regional Park – Pauline Betz Addie Tennis Center – restroom upgrade
- Cabin John Ice Rink Building – installation of ADA compliant restroom stalls and accessibility upgrades at the snack bar, and ramps at the Olympic Ice Rink, new interior and exterior entrance doors, parking spaces, and accessible shelter
- Camp Seneca Special Park – playground renovation, accessible parking space at picnic shelter
- Capitol Crescent Trail –trailhead upgrades at Wisconsin Avenue
- Capitol View/Homewood Local Park – playground renovation
- Clarksburg Greenway Trail – trail construction Phase 1B by developer (based on trail guidelines)
- Clearspring Local Park – parking, new access to soccer and softball field
- Colt Terrace – trail extension (based on trail guidelines)
- Columbia Local Park – renovated playground
- Damascus Recreational Park – restroom renovation Shelter C, parking, walkway to Shelter A
- Darby Store Special Park – new renovation of building, new access, parking
- Darnestown Heritage Park – new park constructed to ADA requirements
- Dewey Local Park – accessible route to playground and installation of ADA parking stalls
- East Norbeck Local Park – park renovation to meet current ADA standards
- Edgewood Neighborhood Park – playground renovation
- Ellsworth Urban Park – renovated playground, new dog park
- Falls Road Local Park – new parking, access to athletic fields, trails, exercise station (ongoing)
- Fernwood Local Park – playground renovation
- Evans Parkway Neighborhood Park – park renovation
- Forest Glen Neighborhood Park – renovated playground
- Forest Grove Neighborhood Park – playground renovation
- Germantown Towne Center Urban Park – park renovation
- Heritage Farm Neighborhood Park – ADA compliant parking stalls
- Hunters Woods Local Park – asphalt trail installation (based on proposed trail guidelines)
- Indian Springs Local Park – parking, accessible routes to basketball and tennis courts
- Johnson Local Park – ADA compliant parking stall and playground renovation
- Kensington Cabin Local Park – accessible route to tennis and basketball courts, compliant parking provisions, playground renovation
- Ken-Gar Palisades LP – parking, trail upgrades, access to courts, exercise station
- Lake Needwood – accessible boat ramps
- Layhill Village Local Park – accessible parking, walkways, tennis courts, soccer field

ADA TRANSITION PLAN

2016 FINAL SELF EVALUATION AND TRANSITION PLAN

[UPDATE OF 2015 INTERIM TRANSITION PLAN]

AUGUST 2016

EMG PROJECT NO.: 102516.12R000-00C.206

- Leland Neighborhood Park – new accessible route and ramp
- Little Bennett Regional Park Campground – group parking lot, accessible parking, yurts, accessible picnic tables
- Little Bennett Regional Park Day Use Area (Phase 1) – new parking, accessible area, tables
- Little Falls Stream Valley Unit #1 – playground renovation
- Little Seneca Stream Valley Unit #1 – miscellaneous accessibility improvements at the model airplane airport
- Manor Oaks Local Park – new playground
- Maplewood Alta Vista NP – playground renovation
- Martin Luther King Recreational Park – parking, access to field and spectator seating, upgrades to parking Lot D,
- Matthew Henson State Park – trail to Mid-County Recreation Center (based on trail guidelines) upgraded parking and access to baseball field, new parking, exercise stations (ongoing)
- Meadowbrook Local Park – parking space additions and upgrades, accessible route upgrades, players bench access to Field # 1, and accessible route connection to existing trail
- Meadowside Nature Center – New patio, observation deck, upgraded classroom, (ongoing)
- Merrimac Local Park – accessible route to tennis court, basketball court, parking, signage
- Mill Creek Towne Local Park – playground renovation, parking, accessible route
- Nolte Local Park – playground renovation, parking space improvement, accessible route to Field #1 and players bench areas
- North Four Corners Local Park – park renovation, accessible entries into recreation building
- North Chevy Chase – accessible parking, access to recreation building, interior upgrades
- Norwood Local Park – addition of accessible parking
- Olney Manor Recreation Park – parking and access to tennis batteries, racquetball, handball, and volleyball
- Opal Daniels Local Park – playground renovation
- Parking signage installation at various parks.
- Parkside Headquarters – miscellaneous signage, internal ramp, service counter
- Parklawn Local Park – parking, walkways, accessible porta john pad
- Peachwood Neighborhood Park (in progress) – park renovation
- Pleasant View Local Park – accessible trail and access to soccer field
- Plumgar Local Park- access to play field, new playground
- Potomac Community Neighborhood Park – parking, walkways to playground, tennis courts, and basketball courts
- Randolph Hills Local Park – ADA compliant shelter and asphalt trail
- Ridge Road Recreation Area – accessible route to restroom, additional accessible parking
- Rock Creek Hills Local Park – accessible route to tennis and basketball courts; installation of ADA compliant parking stalls
- Rock Creek Regional Park – compliant pedestrian bridge over Veirs Mill Road, reconstruction of trail segment along Beach Drive
- Rock Creek Trail - repairs near Connecticut Avenue
- Rockwood Manor /Skyview House – accessible ramp
- Rosemary Hills/Lyttonsville Road Local Park – parking additions and upgrades, access to tennis and basketball courts, playgrounds, and soccer field
- Saddlebrook – playground renovation
- Seek Lane Neighborhood Park – playground renovation
- Seneca Lodge – compliant tent pad for special events
- Seven Locks Local Park – upgraded accessible parking, accessible route to picnic shelter, basketball and tennis courts, and playground, new benches and grills
- Sligo Creek Trail – rehabilitation at Flora Lane and Sligo Creek/Dennis Ave, trail reconstruction (based on trail guidelines)
- Sligo Creek Trail – trail connection at Dryden Street
- Sligo Creek SVU 3 – parking lot improvements
- Sligo Creek SVU 4 – parking lot, access upgrades
- South Germantown Recreational Park– renovation of playground #3 near tennis courts and accessible picnic tables to meet accessibility requirements, accessible route to driving range
- Stewartown Local Park – playground renovation and accessible route to picnic shelter
- Strawberry Knoll Local Park – installation of ADA parking stalls
- Stratton Local Park – renovated restrooms
- Takoma-Piney Branch Local Park – park renovation

- Timberlawn Local Park – playground renovation
- Valley Mill Local Park – parking lot restoration, access to picnic pavilion
- Viers Mill Local Park – repaired/renovated parking and walkway to activity building
- Wall Local Park – playground renovation
- Waters Landing Local Park – playground renovation, parking lot improvements, access to shelter, basketball court and playground
- Westmoreland Hills Local Park – parking lot and accessible route to recreation building, playgrounds, tennis courts, and basketball court
- Wheaton Regional Park – accessible route in Shorefield area to carousel, picnic shelters, grills, and renovations to ramps at the train station, new accessible parking at the train station
- Wheaton Regional Park – playground renovation
- Wheaton Regional Park Ice Rink- bleacher seating and ramps
- Wheaton Regional Park Indoor Tennis – New addition, upgraded parking, exterior access
- Wheaton Woods Local Park – parking lot rehabilitation
- Willard Avenue Neighborhood Park – trail, playground, parking, improvements
- Woodlawn Cultural Special Park – Visitors Center and Barn

Barrier removals are also ongoing in a number of park renovation projects. These projects usually take several years to complete and result in ADA compliant facilities for all individuals to use and enjoy. A listing of the **on-going renovation projects** is:

- Brookside Gardens Greenhouse
- Greenbrier Local Park
- Kemp Mill Urban Park
- Rock Creek Maintenance Facility
- Western Grove Urban Park
- Wheaton Regional Park – Indoor Tennis

Major park renovations are scheduled to begin construction in Fiscal Years 17/18 at these parks all of which will include ADA upgrades and new compliant amenities:

- Good Hope Local Park
- Pincecrest Local Park
- Wheaton Claridge Local Park
- Woodside Urban Park

In addition to park renovations, Montgomery Parks is also developing **new parks**, all of which will be ADA compliant when completed.

Examples of these parks are:

- Laytonia Recreational Park
- Northwest Branch Recreational Park (location of Trolley Museum)

4.8 HISTORIC PARK PROPERTIES

Montgomery Parks stewards 117 historic structures, which are spread throughout 43 sites of county, state, regional, and national historic significance. Preserving and programming these cultural resources for future generations is an important aspect of the agency's mission. Some sites are open to the public; some sites are leased to partners. Some serve as rental housing; some are offices or future offices, while others are vacant and lack a productive use due to site limitations.

The majority of the historic properties which are open to the public, whether as part of the "History In The Parks" program or under the auspices of other park functions, have been evaluated for ADA compliance. These include offices, recreation centers, leases, etc., not all of which are individually listed or described in this chapter. Historic buildings not evaluated as part of the Self-Evaluation include vacant structures, for which no programming or use is anticipated, such as agricultural buildings, sheds, and springhouses.

The "History in The Parks" program currently has nine (9) historic structures and/or sites open to the public at least once per year:

- Bussard Farmhouse at Agricultural History Farm Park
- Josiah Henson Special Park
- Woodlawn Manor and the Underground Railroad Experience Trail
- Needwood Mansion
- Oakley Cabin
- Kingsley Schoolhouse
- Blockhouse Point (A Civil War archaeological site)
- Hyattstown Mill
- Darby Store

The properties listed above are discussed here: The **Bussard Farmhouse** and **Josiah Henson Park** are considered accessible with limitations but may not be fully ADA compliant. Plans to convert the Riley-Bolton House at Josiah Henson Special Park into a museum are in place and include full ADA accommodation. **Woodlawn Manor** consists of three elements: the manor house, a stone barn, and the Underground Experience Trail. The barn is a fully ADA compliant museum. Plans are being developed to put interpretive materials from the **Underground Railroad Experience Trail**, which is a natural surface trail, on the site's webpage. Woodlawn's historic manor house, which is used for events, has some accessibility, but is not fully ADA compliant at this time. At **Needwood Mansion** and **Oakley Cabin**, much of the public programming is outside the building. At Oakley Cabin, any programming that takes place inside the building can also be brought outside. **Kingsley Schoolhouse** and Blockhouse Point, remotely located and tucked within wooded areas, are technically infeasible to making them physically ADA accessible. The **Darby Store** is leased as a commercial enterprise. There is accessible parking available and the building is ADA accessible. For all nine "History in the Parks" properties, Parks maintains an active website that has information for those who cannot visit the sites in person. Expectations for the future are to further develop and expand the website to provide additional detailed information to the public.

Innovative programming, which complies with ADA requirements, is a cornerstone of what Montgomery Parks is and will be doing at the historic sites. Park staff is coordinating with the newly hired ADA staff to provide inclusive programming at the eight open historic sites that are managed on a day-to-day basis by Parks. Inclusive programming will be an important strategy to provide ADA access to existing and future historic structures and properties. There is no public programming at the Darby Store. However, the lease requires the tenant to open the store to the public at least four times per year.

Two historic buildings in the inventory of 117 structures are currently used as offices and one is planned. Parks staff and a non-profit agency promoting heritage tourism occupy the **Waters House**, which is equipped with ramps and a restroom with some accessibility modifications. **Needwood Mansion** is also occupied by Parks staff. At this time, there are no ADA accommodations in that building. Architectural plans are completed to convert **Zeigler Log House** to an office that is ADA compliant. However, Parks office space with ADA accommodation is available at several other, non-historic locations.

In the future, eight other historic buildings will be open to the public, either as part of the "History in the Parks" program, as Parks facilities, or as leases. These include:

- Seneca Store (probable lease)
- Ned Watkins House (event center)
- Jesup Blair House (probable lease and community historical society archives)
- Brainard Warner Manor (Parks facility or probable lease)
- Kensington Cabin (Parks rental activity building)
- Holland/Red Door Store (probable lease)
- Ovid Hazen Wells (probable lease)
- Nathan Dickerson (probable lease)

Parks has commissioned stabilization, design and/or construction plans at **Brainard Warner**, the **Seneca store**, **Jesup Blair House**, and **Kensington Cabin**. In the future, Montgomery Parks will commission rehabilitation projects for **Ned Watkins**, **Ovid Hazen Wells**, **Nathan Dickerson**, and the **Holland/Red Door Store**. The planned renovations and restorations will improve accessibility. Plans for these sites may include, but are not limited to, ADA compliant parking, accessible paths, entrances, and restroom facilities, as well as innovative programming.

Five of the above historic structures, as well as others owned by the Parks system, will fall into the category of technically infeasible due to historic preservation concerns (see section 5.7). These buildings may qualify for use of alternative guidelines under ADA because standard application of the law would “threaten or destroy the historic significance of the building or facility.” Montgomery Parks will consult with the State Historic Preservation Office, per ADA law and guidelines, when developing ADA compliance strategies for these sites.

4.9 FACILITIES ON PARK LAND OWNED AND/OR LEASED BY OTHER ENTITIES

Montgomery Parks manages over 35,000 acres of parkland throughout the County, and has developed many working relationships with both private and public entities. Being a large and complex agency, with many intergovernmental and private partners, property management arrangements vary significantly across the portfolio. The Montgomery County Recreation Department and the Montgomery County School Board are the two most prominent users of parklands, and are classified under the Community Use of Public Lands (CUPF) program. However, other categories of users are involved with parklands, primarily lessees, licensees and concessionaires.

Other public agencies in Montgomery County (for example, Montgomery County Revenue Authority, Montgomery County Department of General Services, the Montgomery County Department of Recreation, and the Montgomery County Public Schools) will or have conducted independent self-evaluations and created separate transition plans for facilities and/or amenities which they operate on park properties. However, as a policy, Parks has evaluated facilities operated by third parties, such as partners or tenants, in order to ensure a comprehensive Self-Evaluation is achieved. Actual modifications required for barrier removal are determined on a case-by-case basis. Arrangements between the Parks and these entities are governed by lease agreements, a public-private partnership agreement, a right-of-entry agreement or other mechanism; Parks will need to review how these instruments currently address ADA provisions and how they may need to be modified in the future. Provisions for ADA access, including both physical and program access, are included in new leases as well as lease renewals.

Some leased facilities fall under the category of residential leases (See Section 4.10 for residential properties). Examples of facilities that are leased by others are shown in the following Table 4.9.

Table 4.9- Park Leases

SmartParks Facility	Park Facility Code (PFC)	Type of Agreement	Facility Address
Germantown East Local Park	D45	Development & Lease-Maintenance and Use of Athletic Fields	19910 Frederick Road Germantown, MD 20876
Wall Park	E14	License - Use of Building	4901 Nicholson Lane Rockville, MD 20852
Seneca Landing Special Park	K02	License – Use of Parking Lot	13015 Riley's Lock Road Poolesville, MD 20837
Rickman Horse Farm	L13	Lease- Equestrian Facility & Residential Units	17320 Moore Road Boys, MD 20841

SmartParks Facility	Park Facility Code (PFC)	Type of Agreement	Facility Address
South Germantown Recreational Park	G11	Draft License- Dairy Museum	18028 Central Park Circle Boys, Maryland 20841
Waters House	N30	Licenses-Office Space	12535 Milestone Manor Lane Germantown, MD 20876
South Germantown Recreational Park	G11	Development and Lease- Sports/ Soccer Facility	18031 Central Park Circle Boys, MD 20841
Meadowbrook Riding Stables	M09	Equestrian Facility (Lease)	8200 Meadowbrook Lane Chevy Chase, MD 20815
Ag History Farm Park (Activity Building)	K07	Office Space (Lease)	18410 Muncaster Road Derwood, MD 20855
Potomac Horse Center	L06	Lease- Equestrian Facility and Residential Units	14211 Quince Orchard Road Gaithersburg, MD 20878
Carson Farm Farmhouse	M07	Wildlife Rehabilitation Center (Lease)	7101 Barcellona Drive Gaithersburg, MD 20879
Seneca Day Camp	N62	Enterprise Division - Offices	14500 Clopper Road Boys, MD 20841
Callithea Farm	L16	Equestrian Facility (Lease)	15000 River Road Potomac, MD 20854

4.10 RESIDENTIAL PROPERTIES

Under the 2010 ADA, M-NCPPC Montgomery Parks is required to ensure that a portion of the leased residential properties under its jurisdiction are compliant and available to individuals with disabilities. Montgomery Parks is also required to ensure that program requirements are met. In order to meet the programmatic requirement, a geographic distribution of ADA compliant residential units will be developed.

The technical requirements regarding residential dwelling units are found in Section 809 of the 2010 Standards. This section addresses accessible routes (809.2), kitchens (809.3), toilet and bathing facilities (809.4) and communication features (809.5). Consistent with the recommendations in the 2012 Interim Transition Plan, we suggest an approach that identifies 5%, or 2 of those houses for compliance with Section 809.

The M-NCPPC Montgomery Parks leases 44 residential properties. Thirty-eight (38) residential properties have been evaluated to date, one of which has subsequently been converted to office use (Camp Seneca Special Park – BH-N62), and one has been demolished (24520 Clarksburg Rd – Little Bennett Regional Park). The remaining 6 are historic homes and were evaluated separately.

The following residential buildings have been evaluated:

RURAL PROS SERVICE AREA

- Camp Seneca Special Park Recreational Facility (BH-N62)- One second story apartment– now used as
- Enterprise Division office space
- Great Seneca Stream Valley Unit #4 (LB-P81) – One single-family residence
- Hawlings River Stream Valley Unit (OM-P13) – One single-family residence
- Rachel Carson Conservation Area (RC-G09) – One single-family residence
- Rickman Farm Special Park (BH-L13) – One single-family residence and a two-unit chalet (upper and lower)
- Seneca Landing Special Park (BH-K02) – One single-family residence

POTOMAC PROS SERVICE AREA

- Potomac Horse Center Special Park (SG-L06) - Two single-family residences and two dormitory buildings
- Rockwood Manor Special Park (CJ-L08) – One single-family residence
- Adventure Conservation Park (CJ-S01) – One single-family apartment residence

I-270 PROS SERVICE AREA

- Little Bennett Regional Park (LB-G06) - Twelve single-family residences
- Ovid Hazen Wells Recreational Park (LB-L07)- One single-family residence

BETHESDA-CHEVY CHASE/NORTH BETHESDA PROS SERVICE AREA

- Willard Avenue Neighborhood Park (CJ-B63) – One single-family residence
- Josiah Henson Special Park (CJ-L17) – One single-family residence

GEORGIA AVENUE PROS SERVICE AREA

- Wheaton Regional Park (WH-G12) – Three single-family residences
- Agricultural History Farm Park (RC-K01) – One single-family residence
- Rock Creek Stream Valley Unit #6 (WH-P50) – One single-family residence
- Kensington-Frederick Avenue Neighborhood Park (BD-B32)– One single-family residence

SILVER SPRING-TAKOMA PARK PROS SERVICE AREA

- Dale Drive Neighborhood Park (SC-B09) – One single-family residence

EASTERN COUNTY PROS SERVICE AREA

- Valley Mill Special Park (MLK-L05) – One single-family residence
- Patuxent River Watershed Conservation Park (OM-S07) – One single-family residence

The selection of residences to be renovated will be based upon structural and architectural feasibility, geographic distribution, financial costs, vacancy, and lease requirements, among other factors. Based solely upon the results of the evaluations, the following residences are candidates for barrier removal to accommodate the ambulatory disabled and wheelchair user, based on PROS service area location and architectural/engineering feasibility:

- a. the lower dwelling unit of the chalet apartments associated with Rickman Farm Special Park (BH-L13); or
- b. the single-family residence associated with Agricultural History Farm Park (RC-K01); or
- c. the single-family residence associated with Rockwood Manor Special Park (CJ-L08).

Other factors must be considered before a final determination can be made. These factors include but not limited to the continuation of the leasing program and a decision of Montgomery Parks to provide ADA accommodation in various service areas of the County.

4.11 PARTNERSHIPS

Residents of Montgomery County enjoy a variety of services and programs managed by Montgomery Parks. All of these facilities and programs occur on land owned or managed by Montgomery Parks. Most are staffed by M-NCPPC employees but 18 facilities are operated by third party “partners.” Most are non-profit corporations and all fall under Title III ADA requirements.

Montgomery Parks partners build and/or manage a variety of programs serving thousands of adults, children, and families. They include equestrian centers, a community farm which employs disabled persons and provides organic produce to food centers and the general public, a baseball field designed specifically for disabled youth players, a dairy museum and trolley museum, a zip line course, and a tennis center and soccer “plex.” A list of partnership properties is shown in Table 4.11.

Table 4.11- Park Partnership

Partnerships	Location
Disabilities: Sports, Employment, Therapy	
Great and Small Therapeutic Riding	Rickman Farm Horse Park
Miracle League	South Germantown Recreational Park
Red Wiggler Community Farm	Ovid Hazen Wells Recreational Park
Public Education	
Hyattstown Mill Arts Project	Little Bennett Regional Park
King Barn Dairy Mooseum	South Germantown Recreational Park
Trolley Museum	North West Branch Recreational Park
Sports/Recreation: Equestrian, Soccer, Zip Line, Tennis	
Callithea Farm Special Park	Blockhouse Point Conservation Park
Go Ape	Rock Creek Regional Park
Jack Schore Tennis/Tennisplex	South. Germantown Recreational Park
Maryland Soccer Foundation/Soccerplex	South. Germantown Recreational Park
Meadowbrook Foundation Inc. (Stables)	Meadowbrook Local Park
Potomac Horse Center	Potomac Horse Center Special Park
Wheaton Park Stables	Wheaton Regional Park
Athletic Fields	
Bethesda Chevy Chase Baseball	Lynnbrook Local Park and Falls Road Local Park
Georgetown University and Big Train	Cabin John Regional Park (Shirley Povich Field)
Maryland Community Baseball	Blair Local Park

Partnerships	Location
Montgomery County Little League	North Chevy Chase Local Park - Field 2
Montgomery County Little League	South. Germantown Recreational Park - Field C
Wildlife	
Second Chance Wildlife Center	Carson Farm Special Park

M-NCPPC is taking the following steps to insure compliance by our partners.

1. As the owner of the properties, Parks assumes responsibility for all required capital improvements consistent with the strategy used for all parks/ facilities in the park system. Partner-operated facilities are included in the facilities references in this Transition Plan.
2. Program access, administrative procedures, and internet based communications are and will be the responsibility of the partners. However, M-NCPPC will be providing resource materials to help insure compliance and will be monitoring compliance as follows:
 - a. One-on-One meetings with the partners by our Senior ADA Compliance Project Manager and Manager of Community Partnerships during the summer/fall 2016.
 - b. Provision of resource materials -summer/fall 2016
 - c. All partners must provide status reports and implementation plans to M-NCPPC due December 2016
 - d. M-NCPPC will monitor compliance efforts on a continual basis with partners required to submit annual updates

4.12 EMPLOYEE WORK AREAS

M-NCPPC Montgomery Parks proposes a policy to rank barrier removals in employee-only work spaces lower than barriers in public areas. However, if staff members with disabilities are hired for employment in non-compliant buildings, Montgomery Parks will ensure that reasonable accommodations are made for those employees in their work areas and supplementary function areas.

The following are examples of what may be considered as employee-only areas:

- Agricultural Farm Activity Center- Sheds
- Black Hill Police Substation
- Black Hill Regional Park-Garage, Park House, various sheds
- Black Hill Maintenance Facility
- Brookside Gardens- Koeneman House
- Little Bennett Maintenance Facility
- Little Bennett Regional Park- W. Day cinder block shed
- Martin Luther King Recreational Park- maintenance buildings and sheds, excluding the office
- North Branch Stream Valley Unit #2- workshop shed
- Northern Regional Administration Building
- Olney Manor Maintenance Facility
- Ovid Hazen Wells Recreation Park- Farm Kitchen/Greenhouse, Oliver Watkins solar house
- Park Police Headquarters-Saddlebrook
- Park Police-Special Operations- Woodlawn
- Rockwood Special Park Maintenance Garage
- South Germantown Recreational Park- Maintenance Buildings #1 and #2 and sheds

- Wheaton Regional Maintenance Facility

4.13 STATUS OF NINETEEN SITES CITED IN THE DOJ SETTLEMENT AGREEMENT

As part of DOJ's Project Civic Access (PCA) Program, the 2011 Settlement Agreement between DOJ and M-NCPPC Montgomery Parks stipulates that ADA improvements to nineteen parks be implemented over a 5-year timeframe. The improvements at each of the parks are outlined in the Settlement Agreement and are based upon the audits conducted by DOJ staff. The Agreement further requires that M-NPPC Montgomery Parks document the improvements and submit reports to DOJ on an annual basis (no later than August 16th of each year). The evaluation reports for each individual park are submitted separately to DOJ and are not part of the Final Transition Plan.

Table 4.13- Status of Nineteen DOJ Park Sites

DOJ PARK NUMBER AND PARK NAME	REQUIRED COMPLETION DATE	STATUS
#14 COFFIELD ROSEMARY HILLS/ LYTTONSVILLE	2014	COMPLETED 2014
#15 PLUMGAR COMMUNITY CENTER**	2016	COMPLETED 2013, 2014, 2016
#24 BAUER DRIVE COMMUNITY CENTER	2015	COMPLETED 2015
#29 POTOMAC COMMUNITY CENTER	2015	COMPLETED 2015
#45 MERRIMAC NEIGHBORHOOD PARK	2013	COMPLETED 2013
#46 CAPITAL VIEW/HOMEWOOD LOCAL PARK	2012	COMPLETED 2012
#47 STRATTON LOCAL PARK	2016	UNDER CONSTRUCTION FALL 2016
#48 KEN-GAR PALISADES LOCAL PARK	2016	COMPLETED 2016
#49 ROCK CREEK HILLS LOCAL PARK	2012	COMPLETED 2012
#50 KENSINGTON CABIN LOCAL PARK	2013	COMPLETED 2013
#51 NEWPORT MILL LOCAL PARK	2012	COMPLETED 2012
#52 PLEASANT VIEW LOCAL PARK	2015	COMPLETED 2015
#53 BURNING TREE LOCAL PARK	2014	COMPLETED 2014
#54 DEWEY LOCAL PARK	2012	COMPLETED 2012
#55 CABIN JOHN LOCAL PARK	2013	COMPLETED 2013
#56 TAKOMA-PINEY BRANCH LOCAL PARK	2013	COMPLETED 2013
#57 AYRLAWN LOCAL PARK	2015	COMPLETED 2016
#58 SEVEN LOCKS LOCAL PARK	2014	COMPLETED 2014
#59 ARGYLE LOCAL PARK*	2014	COMPLETED 2014

*Nolte Local Park serves as a substitute site for Argyle Local Park to satisfy portions of the

DOJ citations for access to baseball fields; improvements were completed in 2014.

** Clear Spring LP serves as a partial substitute site for Plumgar – access to fields. Completed in 2016.

4.14 SIGNAGE PROGRAM

ADA compliant signage serves multiple purposes at a park site. Signage is used to indicate permanent rooms and spaces for people with and without disabilities. Directional and informational signage helps all people find their way around a site, saving time and energy. Compliant signage placement can help direct patrons to parking spaces, accessible restrooms, and accessible entries. Signage can also provide useful information about park facilities, environmental facts, historical information, and unique characteristics of park features.

Section 65 of the Settlement Agreement states: "Within twelve months of the effective date of this Agreement, the County and M-NCPPC Montgomery Parks will install signage as necessary to comply with 28 CFR §35.163(b), after having surveyed all facilities that are the subject of this Agreement for the purpose of identifying those that have multiple entrances not all of which are accessible."

The following is a summary of the signage program at the 19 parks audited by DOJ staff.

Montgomery Parks has developed a signage template for all parks that do not contain buildings. Signage for parks with no buildings has been installed at 10 of the 19 park facilities: Merrimac, Rock Creek Hills, Newport Mill, Pleasant View, Burning Tree, Dewey, Cabin John, Takoma-Piney, Arylawn, and Seven Locks Local Parks. Five of the park sites have buildings owned and/or operated by M-NCPPC Montgomery Parks including Kensington Cabin, Argyle, Ken-Gar Palisades, Stratton, and Capital View-Homewood.

Kensington Cabin Local Park contains a historic building which is currently closed to the public. The park activity building located at Argyle Local Park completed ADA renovation work in 2014; interior building signage has been upgraded. Exterior and site signage has been installed. The restroom building at Stratton Local Park has recently been renovated and compliant signage has been installed. The remaining 4 parks contain buildings owned or operated by the Montgomery County Department of Recreation. These include Bauer Drive, Plumgar, Coffield/Rosemary Hills/Lyttonsville, and Potomac Community Centers, where building signage has been or is being provided by Montgomery County. Plumgar Recreation Center has been fully renovated with construction work completed July 2013; signage is fully compliant. Site signage at the recreation centers has been installed by M-NCPPC Montgomery Parks with the exception of Plumgar.

Montgomery Parks is also developing a signage program in which all other buildings in its system which are open to the public will be provided with ADA compliant signage at exterior building entrances within the next 4 years (by 2020). Interior signage will be provided as buildings are renovated or upgraded as part of the ADA program.

5 M-NCPPC MONTGOMERY PARKS BARRIER REMOVAL STRATEGY

5.1 INTRODUCTION

The overall strategy adopted by M-NCPPC Montgomery Parks for accomplishing ADA compliance is a multileveled approach involving all of its divisions. Program access will be achieved through a combination of structural facility/amenity upgrades and non-structural means (staffing and resources, policy implementation, program, modifications, program expansion, etc.) to comply with Title II requirements. Physical /structural access will be improved to the extent feasible to provide ADA accessibility to its wide range of facilities.

The park system is comprised of 418 parks with over 35,000 acres of land. It is simply impossible and cost prohibitive to remove barriers from the entire system, much of which was acquired and built before adoption of the 1990 ADA regulations and standards. In the ADA Title II regulation, 28 CFR §35.150(a)(1), it is clear that not necessarily every barrier at every existing inaccessible site element must be removed. However, enough barriers must be removed so that the programs and opportunities provided by Montgomery Parks, such as playgrounds, trails, basketball, tennis, passive use of parks, sport fields, and other recurring amenities are accessible. This generally describes the "program access test."

The total number of facilities and barriers identified in the Self-Evaluation process was summarized previously in Section 2.8.3; as a point of reference and for the purposes of the discussion of the strategy of barrier removals, this information is reformatted by PROS area and shown in Table 5.1 below.

Table 5.1- Facilities Evaluated by PROS Area

SUMMARY OF EVALUATED FACILITIES BY PROS AREA				
PROS AREA	FACILITIES EVALUATED	DEVELOPED PARKS EVALUATED	AMENITIES	BARRIERS
Silver Spring/Takoma Park	76	56	641	1996
Bethesda -Chevy Chase/ North Bethesda	72	54	403	1361
I-270	46	38	576	1807
Potomac	55	26	297	1581
Georgia Avenue	139	75	1109	3689
Eastern County	56	39	481	1536
Rural	55	19	446	1631
TOTAL	499	307	3953	13601

DOJ does not provide a formula for establishing the percentage of barriers (shown in the above table) which must be removed, and thus Montgomery Parks must rely on court and administrative decisions, as well as DOJ technical assistance, to address the requirement. As a result of several factors, such as the lack of a DOJ formula, prior court decisions, the reality of limited resources, and the clear desire to make existing sites accessible so programs at those sites are accessible, Montgomery Parks proposes to make a minimum of **one in three** recurring amenities and **all** unique amenities accessible.

Recurring amenities are those which occur in a number of parks, such as sport courts and fields, playgrounds, picnic areas, accessible based on one in three ratios. This approach is subject to the test of technical infeasibility, the provisions for construction tolerance, and the resources of the M-NCPPC Parks Department.

Montgomery Parks defines a **unique amenity** as one offering a singular experience or activity in the Park system. Examples include historic buildings and sites, a tai-chi court, the carousel, and a golf driving range. M-NCPPC also recognizes that certain amenities within its system may be duplicative; however, given the unique type of offerings, geographies, or overall use lends several of these amenities to be defined as unique as a matter of policy. Examples of these types of “unique” amenities include Brookside Gardens, nature centers, and ice rinks. Thus, by definition, these types of facilities and amenities offer unique opportunities and programs and thus must comply with the Title II requirements; these requirements are also subject to technical infeasibility limitations, construction tolerances, and resources as defined in the 2010 ADA Standards.

A list of recurring amenities and unique amenities can be found in Section 5.5 and 5.6 respectively.

5.2 PARAMETERS FOR RANKING BARRIER REMOVAL

M-NCPPC Montgomery Parks has developed parameters for the selection of parks within the respective funding source categories of the various park types. Community-use parks are funded through M-NCPPC Commission bonds whereas County-wide parks utilize County general obligation bonds. The following parameters have been selected:

Parameters for Community-use parks

- Local and Neighborhood Parks will be treated as one category since most recurring amenities occur in these parks, which are widely distributed throughout the County.
- Urban Parks, some of which are scheduled for renovation under various CIP efforts, will be made ADA-compliant as part of the planned renovation work including a new CIP program for urban parks. Minor renovations may be conducted based upon need, safety, or citizen input.
- Neighborhood Conservation Areas are ranked low due to lack of amenities.

Parameters for County-wide parks

- Stream Valley Parks, Conservation Parks and are ranked low due to lack of amenities.
- Special Parks will be handled on a case-by-case basis.
- Regional and Recreational Parks will be treated as a separate group of parks, yet ranked higher due to the high level of park usage, occurrence of unique amenities, and number of amenities located within these parks. A separate strategy has been initiated to address barrier removals at these large complex parks.

Parameters for Enterprise Facilities

- Each facility is generally considered on a case by case basis depending on whether it is considered unique or recurring, and will be made accessible subject to the technical infeasibility limitations.
- Due to fluctuating yearly budgets resulting from fee based operations, available resources for accessibility improvements will vary accordingly.

In addition to the above parameters, the Department proposes to employ several “ground rules” for barrier removal as general guidelines to improve accessibility at the park level as well as systemically:

- When the majority of amenities within local, neighborhood, or urban parks are made ADA accessible, the remaining amenities in the park should be considered for ADA accessibility improvements
- Amenity compliance is only achieved when all barriers associated with the amenity have been removed, which usually start from the point of site access such as parking lot or site entrance.
- For properties and programs developed with partners, tenants, 3rd parties, or other similar arrangements, ADA Compliance and Building Condition Assessments should be analyzed concurrently. Leased properties, which offer recreational amenities and programs similar to those by M-NCPPC, shall be considered a part of the Montgomery Parks inventory and thus subject to the same “1 in 3” rule for recurring amenities. Otherwise, other leased facilities, amenities, and programs will be considered on a case by case basis.

The parameters as generally described above will enable the best use of available funds to provide the optimal access to County programs in its parks. Removal of individual barriers or the same barrier system-wide is not a performance measure or indicator of success. **A fully physically accessible amenity combined with appropriate program access is the only true indicator of successful achievement and compliance with the spirit and intent of the ADA.**

5.3 PHYSICAL ACCESS STRATEGY

The goal is to expand resources that provide optimal positive benefits to the public while utilizing existing processes within M-NCPPC. In order to achieve the objective for system-wide ADA Accessibility and to meet the Program Access test, Montgomery Parks is proposing to retrofit one in three recurring amenities which exist within the park system as well as perform retrofits to unique and uniquely defined amenities/facilities. Both are subject to technical infeasibility, construction tolerances, and resource limitations. In order to achieve M-NCPPC goals in a reasonable timeframe and with the resources available, barrier removals must be ranked in order to ensure those with the highest priorities are removed first. Thus a decision criteria strategy for barrier removals is required. The proposed strategy can generally be described as an approach which provides optimal yet cost effective accessibility to the greatest number of people in the shortest possible distance between home and park.

The strategy is to sort barrier removals on a park-wide system basis with the consideration of number and types of amenities within the specific park. Parks are prioritized within local and non-local based funding sources.

The development of the 2016 Final Transition Plan is based on the criteria established below:

- Population density of PROS areas
- Park type- countywide versus community focused
- Proximity to public transit
- Unique amenities within the park
- Assets within the park:
 1. parking
 2. restrooms
 3. publicly available rooms
 4. recreational amenities
- Barrier priority ranking
- Citizen inquiries, safety concerns, and special services, such as group homes and day programs

This combination of system-wide and localized prioritization provides the guidance and strategy needed to develop and implement the 2016 Final Transition Plan.

The major criteria are discussed in greater detail below:

CRITERION ONE: PROS AREA

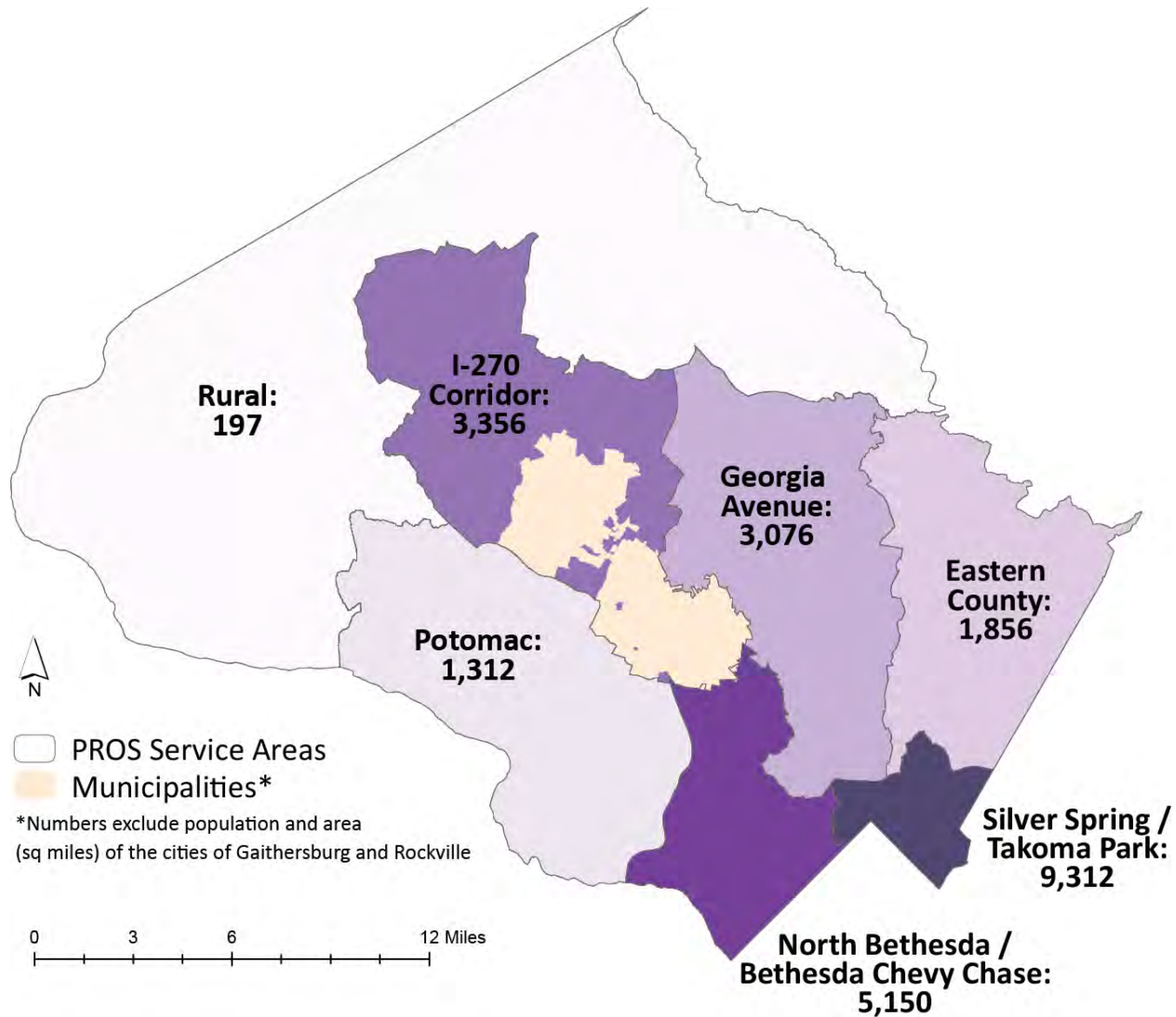
For the 2016 Final Transition Plan, analysis of ADA data is organized and sifted into seven PROS service areas. These areas are filtered by population density and ranked as follows:

1. SILVER SPRING/TAKOMA PARK- mixed residential and business area with the highest density
2. BETHESDA CHEVY CHASE /NORTH BETHESDA- mixed area of residential neighborhoods with high density business corridors
3. I-270 CORRIDOR- north-south interstate transportation corridor, including high density business areas and two major cities of Gaithersburg and Rockville. At this time the population of the I-270 corridor and Georgia Avenue are approximately equal.
4. POTOMAC- primarily residential neighborhoods with pockets of dense business development
5. GEORGIA AVENUE- north-south Maryland State Route corridor, including high density business areas with residential neighborhoods

- 6. EASTERN COUNTY- mixed residential and business area of smallest gross acres
- 7. RURAL- least populated farmland and residential neighborhoods in the north, northwest and northeast sectors of the County

Figure 5.3 below provides the population data for the PROS service areas, supported by Table 5.3.1- Population Demographics of PROS Service Areas.

Figure 5.3 - Population Data of PROS Service Areas



SOURCE: 2012 PARK, RECREATION, AND OPEN SPACE PLAN (PROS)

Table 5.3.1 - Population Demographics of PROS Service Areas

PROS SERVICE AREA	SQUARE MILES	2010 POPULATION*	PERSONS PER SQUARE MILE (DENSITY)
Silver Spring/Takoma Park	12	111,745	9,312
Bethesda Chevy Chase/ North Bethesda	30	154,490	5,150
I-270 Corridor**	53	177,860	3,356
Georgia Avenue	62	190,742	3,076
Eastern County	51	95,128	1,865
Potomac	67	87,872	1,312
Rural	208	40,980	197

*Population data from Round 8.0 Forecast, M-NCPPC Montgomery County Planning Department.

** Area (in square miles) and population of Gaithersburg and Rockville not included.

SOURCE: 2012 PARK, RECREATION, AND OPEN SPACE PLAN (PROS)

CRITERION TWO: PARK TYPE

The next level of filtering is the park type. In general, countywide parks attract more users from wider areas of the County, and therefore, should necessarily receive a higher ranking than community parks. Countywide park types are regional parks, recreational parks, special parks, stream valley parks which often contain large trail systems, historic and cultural parks, and some miscellaneous park facilities. Most community parks are visited by fewer people, are smaller in size, such as are urban, neighborhood, and local types of parks. Their interest and popularity is primarily localized and community based.

CRITERION THREE: PROXIMITY TO PUBLIC TRANSIT

The proximity of park entrances to public transportation is an important factor for planning purposes. Many people with disabilities use and rely on the public transportation system for access. Further, DOJ ranks public transit access as a very high priority. If park entrances are less than 200 feet from a public transportation (the maximum walking distance for persons eligible for an MVA disability placard), the ranking is higher than those sites where public transportation is between 200 linear feet and 0.75 miles (distance based upon Metro Access service eligibility). No transportation ranking points are given to those parks where the distance to public transportation is greater than 0.75 miles.

CRITERION FOUR: UNIQUE AMENITIES

All unique amenities are assigned a higher ranking than amenities which are recurring. Accordingly, parks that have unique amenities are also ranked higher. Because of their singular nature, a higher degree of focus must be given to unique amenities than to those amenities which occur on a repetitive basis.

CRITERION FIVE: TYPE OF ASSETS WITHIN THE PARK

The type of assets within the park and with which the amenity is associated play an important part in the ranking system. The following list of assets are ordered by the highest priority within the asset list based upon public opinions: parking, restrooms, publicly available rooms, and recreational amenities.

Barriers were found in the employee work areas and areas not open to the public. Accordingly, employee work areas and non-public areas are ranked lower than public spaces within buildings, facilities, and park sites, so that expenditures are focused on public benefits first and foremost. Employee work spaces are discussed in detail in Section 4.12.



CRITERION SIX: BARRIER PRIORITY RANKING

The ranking of the importance of barrier removals is based upon the 28 CFR Part 35 Title II Regulations, Section 35.15. Barriers have been assigned a weighted value based on ranking tiers from one to four, with tier one being the highest priority. See Appendix F for a listing of assigned barrier priorities.

CRITERION SEVEN: CITIZEN INQUIRIES, SAFETY CONCERNS, AND SPECIAL SERVICES

Citizen inquiries regarding accessibility create the need to focus on those programs and services provided in the area of inquiry. Additionally, safety issues may become apparent via citizen input, routine maintenance inspections, or staff observations. Services, such as group homes or day programs, for example, require unique responses to particular needs. Therefore, a weighted rank is provided for those focal areas. This criterion may, depending on the circumstances, raise the overall priority to a level requiring immediate action and response and thus overshadow any of the above listed criteria and priorities.

Additional Factors

In addition to the foregoing criteria, additional factors being used in determining priority levels include:

- Planned Lifecycle Asset Replacement and Park Facility Planning efforts
- Geographic distribution of amenities
- Distance of travel to amenities within the park
- Availability of restroom facilities

The actual ranking and scoring system to weigh parks, amenities, and barrier removals is based upon the criteria listed below. Each criterion is ranked from 10 (highest) to 1 (lowest). Within each criterion, each subcategory is weighed based upon its relative importance and assigned a value between 10 and 1, from highest to lowest in a generally even distribution. Table 5.3.2 below defines the criteria weighting assigned to recurring and unique amenities.

Table 5.3.2 – ADA Ranking System for Recurring and Unique Amenities

ADA RANKING SYSTEM FOR RECURRING and UNIQUE AMENITIES		
CRITERIA		WEIGHTED POINTS
PROS AREAS (weighted value: 10)**		
Silver Spring/Takoma	10	100
Bethesda/Chevy Chase	8	80
I-270 Corridor	6	60
Georgia Avenue	6	60
Eastern County	4	40
Potomac	3	30
Rural	1	10
PARK TYPE (weighted value: 8)		
Countywide (Regional, Recreational, Special, Stream Valley, Historic/Cultural, Miscellaneous)	10	80
Community (Urban, Neighborhood, Local)	5	40



ADA RANKING SYSTEM FOR RECURRING and UNIQUE AMENITIES		
CRITERIA		WEIGHTED POINTS
PROXIMITY TO PUBLIC TRANSIT FROM PARK ENTRANCE (weighted value: 7)		
Less than 200 feet	10	70
Less than 0.75 miles	5	35
UNIQUE AMENITY (weighted value: 6)		
Yes	10	60
No	0	0
ASSET RANKING (weighted value: 5)		
Parking	10	50
Restrooms	8	40
Publicly Available Rooms	7	35
Recreational Amenities	6	30
BARRIER RANKING PRIORITY (Based upon DOJ, as shown in Appendix F) (weighted value: 4)		
Ranking 1	10	40
Ranking 2	7	28
Ranking 3	4	16
Ranking 4	1	4
CITIZEN INQUIRIES/SAFETY CONCERNS/SERVICES (group homes, day programs, etc.) (weighted value: 3)		
Yes	10	10
No	0	0

Note: **Higher value (weighting) is given to population density than any other criteria; thus, criteria 1 is weighted at value “10” and criteria 2 is weighted at value “8”, and so forth. As of 2010, the population density of PROS areas I-270 Corridor and Georgia Avenue were virtually identical and thus the scores were rated equally.

EASY BARRIER REMOVAL (EBR)

Many of the barriers require a minimal amount of effort or expense to remove, and are found throughout the park system. Repairs and removal of these barriers typically are performed by the Facilities Management Division or other operating Divisions. These types of barrier removals are called “Easy Barrier Removal” (EBR).

EBRs are defined as tasks to repair or replace barriers to accessibility, which are incorporated into and done concurrently with larger maintenance/repair work orders. The tasks generally require small elements of time, consisting of one half day or less labor and do not require design or project management oversight, other than by shop supervisors or crew leaders. The barrier removals do not have a specific scheduling requirement or strategy; rather, they are a part of larger work programs.

EBRs represent approximately 43.5% of the total number of barriers, and are estimated at approximately \$6.6 million (excluding contingencies), or approximately 17% of the total estimated cost of barrier removal based on planning level estimates. EBRs will be identified within the SmartParks/EAM system as a separate work program. See Appendix H- Easy Barrier Removal for the full list of barriers in this category.



BEST PRACTICES

M-NCPPC elected to evaluate amenities which are not within the scope of the ADA, but are included in the ABA Outdoor Developed Areas Guidelines, as a best practice. Amenities such as paved trails, trailheads, picnic grounds, and campgrounds are included in the Outdoor Developed Areas Guidelines for Federal lands and projects. Barrier removals will be performed for these types of amenities when associated with other ADA projects and upgrades, but will be ranked lower than the facilities and amenities covered by the 2010 ADA Standards of Accessible Design.

REGIONAL AND RECREATIONAL PARKS

The 12 Regional and Recreational Parks in the park system represent a significant resource of the park system. These parks contain numerous amenities and features available to the public. Often the parks themselves are very large, comprising hundreds of acres each. They are very complex with developed and natural open space areas spread throughout the respective parks. A comprehensive approach is needed at each park to address the accessibility needs on park-wide basis. Given the sheer size of each, it is impossible and simply not practical to address amenity access and barrier removals as a single event or project.

A study has therefore been initiated to look at each park and develop individual strategies based upon the specific circumstances of each park. The studies utilize an outside in (from parking to amenity) approach as described earlier in this report and balances costs for barrier removal versus the number of amenities served. Each study will also address accessibility between various components within the park with the goal of developing a linkage between major areas. This information will be utilized to develop an overall strategy for barrier removal. Studies for each park were initiated in 2015 with an expected completed of late 2016/early 2017. Implementation will commence immediately upon the study completion in accordance with the overall Phasing schedule described in Section 5.9.

The Final Transition Plan serves as a point of reference representing the state of programs and facilities through February 2016. Due to the numerous ongoing efforts by various divisions within Parks to remove barriers in its system, there may be various instances where the Final Transition Plan may include barriers which have already been removed but have yet to be documented in the SmartParks/EAM database.

5.4 PROVISION OF PHYSICAL FACILITIES TO ENSURE PROGRAMMATIC COMPLIANCE (PROGRAM ACCESS TEST)

Existing sites have been evaluated for access per section 28 CFR §35.105 of the Title II regulation. Per Section §35.150 (a), not every existing inaccessible site requires the removal of architectural barriers. However, programs and recreational opportunities provided by the Department, such as playgrounds, basketball, tennis, mini-golf, fitness, sports fields, and passive use of parks must be made accessible.

If activities and programs are located at only inaccessible sites, the program can be offered at an accessible site. Montgomery Parks may also relocate the program, or offer the same program at both sites. In both approaches, access is achieved and the program is compliant with ADA Title II requirements.

Amenities have been segregated into unique amenities and recurring amenities. The proposed achievable goal set forth in the 2012 Interim Transition Plan is to eliminate barriers in recurring amenities and make these accessible at a ratio of 1 in 3; the definition of recurring amenities can be found in Section 5.1 and are also further discussed below in Section 5.5. Unique sites due to their singular nature within the Montgomery Parks system must be made accessible subject to technical infeasibility, historic preservation exceptions and other issues. Unique amenities are defined in Section 5.1 and discussed further in Section 5.6. This strategy has been proposed and incorporated into the Final Transition Plan.

In order to satisfy the Program Access test requirement, Montgomery Parks established a number of districts within the County. The districts are general defined by physical boundaries -road, stream valleys and the like. Approximately 50 districts were created. The goal was to ensure that accessible programs and amenities will be available to all citizens within a short commute (approximately 10 to 15-minute drive) of their homes. Within each district, the strategy for recurring amenities (1 in 3) was applied to all parks/amenities within the respective districts. Unique amenities by definition will be made accessible. Accordingly, all amenities and all amenities to be made accessible within each district were identified. Thus, the Program Access Test requirement was satisfied as required by the implementing regulations. The districts can be seen in Appendix E. The results of these efforts showing proposed accessible amenities within parks are shown in Appendix G.

While areas of public concern can be addressed by the Maryland National Capital Park and Planning Commission in terms of placing a priority on specific areas or features, it does not relieve the Commission of responsibilities under the regulations to provide accessibility to all areas, programs, and functions regulated by the ADA. For example, while the public survey results show that volleyball courts are not a top priority for the respondents, the Montgomery Parks is still required to correct all barriers for those volleyball courts which are deemed critical to ensuring equal opportunity to the program of providing volleyball courts for the public.

5.5 RECURRING AMENITIES

Relative to recurring programs and amenities, the proposed achievable goal in the Final Transition Plan is to eliminate barriers in one out of three recurring amenity types. Table 5.5.1 indicates the numbers of accessible amenities required system wide in each category based on the ratio of one in three as well as the proposed numbers based upon the Program Access Test (mentioned in the previous Section 5.4). The full amenity list can be found in Appendix G, Part 1, of this document.

Table 5.5.1- Recurring Amenity Types

RECURRING AMENITY TYPE	TOTAL AMENITIES MONTGOMERY PARKS	GOAL: ONE IN THREE	PROPOSED NUMBER TO BE MADE ACCESSIBLE
ACTIVITY CENTER	2	1	2
ARCHERY	2	1	2
ARENA	2	1	1
BARN**	5	2	4
BASEBALL FIELD (Adult)	27	9	18
BASEBALL FIELD (Youth)	3	1	3
BASKETBALL COURT	211	71	95
BOAT DOCK	6	2	2
BOAT LANDING RAMP ¹	2	1	0
BOAT RENTAL BUILDING	2	1	2
BOTANICAL GARDEN	2	1	1
CAMPGROUND	2	1	2
COMMUNITY GARDENS ²	8+	3	4
CRICKET FIELD	8	3	7
DOG PARKS	6	2	6
EVENT CENTER	4	2	4
EXERCISE TRAIL	11	4	9
FOOTBALL/SOCCER FIELDS	169	57	76

ADA TRANSITION PLAN

2016 FINAL SELF EVALUATION AND TRANSITION PLAN
 [UPDATE OF 2015 INTERIM TRANSITION PLAN]
 AUGUST 2016

EMG PROJECT NO.: 102516.12R000-00C.206

RECURRING AMENITY TYPE	TOTAL AMENITIES MONTGOMERY PARKS	GOAL: ONE IN THREE	PROPOSED NUMBER TO BE MADE ACCESSIBLE
GAZEBO	25	9	10
GOLF COURSE ³	3	1	1
HANDBALL COURT	10	4	7
HORSE STABLES (EQUESTRIAN RIDING RING)	5	2	1
HORSESHOE COURTS	10	4	7
IN-LINE (ROLLER) HOCKEY RINK	4	2	4
ICE RINK	2	1	2
MINIATURE TRAIN	2	1	1
MULTIUSE COURT	9	3	4
MULTIUSE FIELD ⁴	5	2	0
NATURE CENTER ⁵	5	2	3
PARK ACTIVITY BUILDING	28	10	19
PARKING LOT	329	110	190
PICNIC SHELTER (PERMITTED AND NON-PERMITTED)	129	43	66
PLAYGROUNDS ⁶	276	92	92
RESTROOMS	172	58	79
SKATE PARK	3	1	3
SOFTBALL FIELD (Adult)	142	48	63
SOFTBALL FIELD (Youth)	3	1	3
TENNIS COURTS (INDOOR) ⁷	12	4	0
TENNIS COURTS (OUTDOOR)	284	95	161
TRAILS- HARD SURFACE (miles)	43	N/A	N/A
TRAILS- NATURAL SURFACE (miles)	150	N/A	N/A
VOLLEYBALL COURT	21		14

Notes:

1. Boat landings cannot be made accessible. Accessible boat docks/launches may be provided at the respective park.
2. Three of the eleven community gardens are located on properties not owned by M-NCPPC Parks.
3. Golf courses are located on the property of M-NCPPC Parks; they are managed and regulated by the Revenue Authority, which is responsible for ADA accessibility improvements. M-NCPPC will be responsible for only one of them to be made accessible.
4. Multi-use fields are actually un-programmed open areas used for general play and recreation, and therefore are not shown on the recurring amenity list.
5. Maydale Nature Center is currently closed and may be renovated/reopened in the future.



RECURRING AMENITY TYPE	TOTAL AMENITIES MONTGOMERY PARKS	GOAL: ONE IN THREE	PROPOSED NUMBER TO BE MADE ACCESSIBLE
<p>6. Playgrounds will be made accessible under a separate CIP program and thus are not included in the Final Transition Plan as part of the overall compliance cost. Playground accessibility IS a very high priority for Parks.</p> <p>7. Tennis bubbles cannot be made accessible due to the high door pressure required to maintain internal pressure (to prevent collapse of the bubble). However, access to the entrance of tennis bubbles will be provided and made ADA compliant.</p>			

The majority of the respondents to the Vision 2030 survey rated “Hard Surface Trails” as a top priority within parks. The second and third highest rates areas of interest in M-NCPPC-Montgomery Parks’ facilities are natural surface trails and natural areas. However, access to those areas by individuals with disabilities is severely limited. The significant financial and environmental cost of amending existing hard surface trails limits the ability to create accessible trails that comply with the ABA Outdoor Developed Areas Guidelines. Furthermore, the significant upgrades needed for compliance with the Guidelines may fundamentally alter the nature of the trails program. Therefore, if an existing hard surface trail does not substantially conform to the Guidelines or would require significant alteration to the natural environment to conform, it is considered inaccessible, and is proposed as technically infeasible to reconstruct the trail. Nonetheless, the Department (is and) will actively strive to provide and/or improve accessibility for trail users.

The ADA Self-Evaluation did not include natural surface trails or amenities which are approached only by a natural surface trail. Natural surface trails are not included in the 2010 ADA Standards for Accessible Design. Although the ABA Outdoor Developed Areas Guidelines do cover natural, unpaved trails, Montgomery Parks elected not to include natural surface trails in the Self-Evaluation.

5.6 UNIQUE AMENITIES

M-NCPPC Montgomery Parks is obligated by Title II of the ADA to ensure that all programs, services, or activities are accessible to individuals with disabilities. This is measured by the “program access test” found in 28 CFR §35.150 of the Title II regulation (see 28 CFR Part 35). Any unique, one-of-a-kind programs and facilities must be made fully accessible, unless it is technically infeasible to do so. In Montgomery Parks, a unique amenity is defined as one offering a singular experience or activity in the park system. M-NCPPC also recognizes that certain amenities within its system may be duplicative; however, the unique type of offerings, geographies, or high overall use lends these amenities to be defined as unique as a matter of policy. Based upon the completed self-evaluations, the complete inventory of unique amenities is listed in Table 5.6.

Table 5.6- Unique Facilities

INVENTORY OF UNIQUE AMENITIES (SINGULAR)

<u>Park Name</u>	<u>Amenity</u>
Agricultural History Farm Park	Bussard House (Historic)
Blockhouse Point Conservation Park	Historic
Black Hills Regional Park	Fishing Pier
Cabin John Regional Park	Tai-Chi Court
Darby Historical/Cultural Park	Darby Store
Glenfield Local Park	Bocce Court
Josiah Henson Special Park	Historic
Little Bennett Regional Park	Hyattstown Mill (historic)
Little Bennett Regional Park	Kingsley Schoolhouse (historic)
Little Seneca Stream Valley Unit #1	Model Airpark
Olney Manor Recreational Park	Racquetball Court
Pilgrim Hill Local Park	Shuffleboard Court
Reddy Branch SVU	Oakley Cabin (historic)



Ridge Road Recreational Park	In-Line Hockey Rink
Rock Creek Regional Park	Amphitheatre (Cabin John not in use)
Rock Creek Regional Park	Needwood Mansion (historic)
Rock Creek Regional Park	Rope Course (Go-Ape)
South Germantown Recreational Park	Driving Range
South Germantown Recreational Park	Mini-Golf
South Germantown Recreational Park	Mooseum
South Germantown Recreational Park	Splash Park
South Germantown Recreational Park	Soccerplex - Discovery Center, Stadium
Wheaton Regional Park	Carousel
Wheaton Regional Park	Sports Pavilion
Woodlawn Manor Special Park	Historic
Woodside Urban Park	Gymnasium
Northwest Branch Recreational Park	Trolley Museum

INVENTORY OF UNIQUE AMENITIES (POLICY)

<u>Park Name</u>	<u>Amenity</u>
Black Hills Regional Park	Boat Dock
Black Hills Regional Park	Nature Center
Cabin John Regional	Campground (primitive)
Cabin John Regional	Ice Rink
Little Bennett Regional Park	Campground
Rock Creek Regional Park	Archery Range
Rock Creek Regional Park	Boat Dock
Rock Creek Regional Park	Nature Center
South Germantown Recreational Park	Archery Range
Wheaton Regional Park	Formal Gardens (Brookside)
Wheaton Regional Park	Ice Rink
Wheaton Regional Park	Miniature Train
Wheaton Regional Park	Nature Center

The goal is to provide physical and/or programmatic access at all unique locations.

5.7 TECHNICALLY INFEASIBLE AND MAJOR EXCEPTIONS TO COMPLIANCE

ADA barriers determined to be technically infeasible have been identified as a result of the Self-Evaluation process. The 2010 ADA Standards for Accessible Design define technically infeasible barriers in Section 106.5:

With respect to an alteration of a building or a facility, something that has little likelihood of being accomplished because existing structural conditions would require removing or altering a load-bearing member that is an essential part of the structure frame; or because other existing physical or site constraints prohibit modification or addition of elements, spaces, or features that are in full and strict compliance with the minimum requirements.

Additionally, the ABA Outdoor Developed Areas Guidelines establish conditions for exceptions to the trail requirements:

- Compliance is not feasible due to terrain
- Compliance cannot be accomplished with the prevailing construction practices
- Compliance would fundamentally alter the function or purpose of the facility or the setting
- Compliance is precluded by the Endangered Species Act; National Environmental Policy Act; the National Historic Preservation Act; the Wilderness Act; and other Federal, State, or local law the purpose of which is to preserve threatened or endangered species; the environment; or archeological, cultural, historical, or other significant natural features.



Based on the foregoing references, the following park amenities are examples of amenities which may qualify as meeting the definition for technical infeasibility. In some cases of technical infeasibility, it may be possible to remove selected barriers, but not all barriers which exist at the amenity:

POTOMAC PROS AREA

- Potomac Horse Center Special Park (SG-L06)- Farmhouse (residential lease)
- Gregerscroft Neighborhood Park (CJ-B70)
- Adventure Nature Center (N48)- closet/storage
- Buck Branch Neighborhood Park (CJ-B04)- playground bench
- Cabin John Ice Rink (CJ-N41)- Olympic Rink wheelchair space, storage closet
- Cabin John Maintenance Facility (CJ-M34)- storage closet
- Cabin John Regional HQ (CJ-M99)- door and closet
- Cabin John Regional Park (CJ-G01)- Family Picnic Area slides
- Gregerscroft Neighborhood Park (CJ-B70): accessible routes and playground
- Highland Stone Park (CJ-B26)- elevated play structure
- Hillmead Park (CJ-B27)- accessible route to tennis court
- Josiah Henson Special Park (CJ-L17)- interior stairs
- Locust Grove Nature Center (CJ-M25)- meadow and stream valley areas
- McCrillis House and Gardens (CJ-L01)- door and closet, stairs
- Norwood Day Care (CJ-N57)-door
- Norwood Recreation Facility (CJ-N78)- stairs, door, closet
- Rockwood Manor (CJ-N50)- Skyview House, Manor House elevator/door/closet
- Sangamore Local Park(CJ-D98)- accessible route to amenities
- Shirley Povich Field (CJ-M61)- doors, sunken dugout, press boxes
- Tilden Woods Recreation Center(CJ-N88)- door, closet
- Timberlawn Local Park (CJ- E52)- elevated play structure

GEORGIA AVENUE PROS AREA

- Agricultural History Farm Park (RC-K01)- Bussard Farm House (non-residential use by Parks)
- Brookside Conservatory (WH- B07)- door and closet
- Brookside Gardens Maintenance (WH-M03)- garage, closet, doors
- Brookside Nature Center (WH-M04)- doors, closets
- Meadowside Nature Center (RC-M10)- Pioneer Homestead buildings: Block Shed, Brown and White Shed, Brown Cabin, Front Cabin, and McClosky Cabin Building B are abandoned structures not in current use
- Pope Farm Nursery (RC-N11)
 - Historic House (non-residential use by Parks as office)
 - Cook's Range Building C
- Rock Creek Regional Needwood Mansion (RC-N06)- Needwood Mansion (non-residential use by Parks as office)
- Wheaton Regional Park-Open Air Skate Rink (WH- N39)- doors, closets
- Wheaton Regional Park Athletic Fields (WH-M28)- garage
- Wheaton Regional Park (WH-G12)- elevated play structure
- Wheaton Ice Rink (WH-N40)- closet
- Wheaton Regional Park Carousel (WH-M41)- closet
- Wheaton Regional Park Train (WH-N93)- door
- Saddlebrook Police Headquarters(WH-N17)- restroom, closet
- Woodlawn Cultural Special Park (OM-K03)- Woodlawn Manor House (non-residential use by Parks as event center)

EASTERN COUNTY PROS AREA

- Paint Branch Stream Valley Unit 5- Paint Branch Trail

I-270 PROS AREA

- Black Hill Police Substation (BH-N29)- Police boat dock building and boat ramp
- Black Hill Regional Park (BH-G07)
 - Black Rock Trail and Connector Trail
 - Public Boat Launch
- Green Farm Conservation Park (SG-S03)- Nathan Dickerson House (formerly a residential house; now vacant)

RURAL PROS AREA

- Camp Seneca Special Park Recreational Facility (BH-N62)- Recreational Facility building second story only
- Damascus Recreation Park (LB-G02)- Magruder Branch Trail
- Little Bennett Regional Park (LB-G06)
 - Charles Browning Farm House (duplex leased as 2 separate residential units)
 - Zeigler Lighthouse second story
- Ovid Hazen Wells Recreational Park (LB-L07)- Oliver Watkins farmhouse (residential lease- long term vacancy)
- Magruder Branch Stream Valley Unit #2 (LB-P77)
 - Hard Surface Trail #2
 - Paved Trail with Boardwalks
- Rachel Carson Conservation Area (RC-G09)– Greenwood Miller Cottage
- Seneca Landing Historical Park (BH-K02)- buildings at 16315/16401 Old River Road (one residential lease and one commercial building probable lease)
- South Germantown Recreational Park (BH-G11)
 - Tennis Bubbles
 - PV Trail A
- Woodstock Equestrian Park (BH-L14)- Brewer farm and outbuildings

5.8 RANKING RESULTS

The first level of ranking is the PROS area; areas are listed from highest population to lowest density. The results of PROS area rankings are in Table 5.8.1. Full ranking results by PROS area districts are shown in Appendix G. Selections of one out of three recurring amenities to be made accessible are listed on Appendix G- Part One. The ranking results of the PROS areas generally indicate that the areas closest to the core of the Washington Metro area rank highest and are the most populous.

Table 5.8.1- PROS Area Ranking

PROS SERVICE AREAS IN RANK ORDER	Rank	Points
Pros Area 1 - Silver Spring / Takoma Park	1	100
Pros Area 2 - Bethesda Chevy Chase / North Bethesda	2	80
Pros Area 3 - I-270 Corridor	3	60
Pros Area 5 - Georgia Avenue	4	60
Pros Area 6 - Eastern County	5	40
Pros Area 4 -Potomac	6	30
Pros Area 7 - Rural	7	10



RANKING BY PARKS

Montgomery Parks has twelve regional and recreational parks. Eleven regional and recreational parks received the highest rankings, as a result of the larger number of amenities located in those types of parks. The twelfth regional/recreational park, Ovid Hazen Wells Recreational Park, received lower ranking than several local parks due to its relatively undeveloped nature. All other parks rank below the regional and recreational parks.

Parks are ranked based upon the previously described criteria such as PROS area, local versus countywide, public transit availability, amenities, and other criteria, as described in earlier sections of this FTP. The full list of rankings is provided in Appendix G Part 1.

Table 5.8.2- Regional and Recreational Park Ranking

Regional/ Recreational Park	Park Maintenance Area	Park Code	PROS Service Area	Ranking Points
SOUTH GERMANTOWN RECREATIONAL PARK	SG	G11	3/7	3685
CABIN JOHN REGIONAL PARK	CJ	G01	4	2760
WHEATON REGIONAL PARK	WH	G12	5/6	2625
ROCK CREEK REGIONAL PARK	RC	G10	5	2150
OLNEY MANOR RECREATIONAL PARK	OM	H05	5	1875
BLACK HILL REGIONAL PARK	BH	G07	3	1730
LITTLE BENNETT REGIONAL PARK	LB	G06	7	1660
MARTIN LUTHER KING RECREATIONAL PARK	ML	H02	6	1225
RIDGE ROAD RECREATIONAL PARK	LB	H07	6	1120
FAIRLAND RECREATIONAL PARK	OM	G04	7	1060
DAMASCUS RECREATIONAL PARK	LB	G02	3	995
OVID HAZEN WELLS RECREATIONAL PARK	LB	L07	3	755

Table 5.8.3- Parks Rankings by PROS Areas

Table 5.8.3 lists parks ranked by PROS area, all of which are ranked lower than the regional and recreational parks shown in Table 5.8.2, except for three large parks rated higher than Ovid Hazen Wells Recreational Park. Only the top ten ranked parks within each PROS area are shown, except for PROS Area 3, where two parks had equal rating as the lowest rating of the top ten. The full list of rankings is provided in Appendix G, Part 1.

Park	Park Maintenance Area	Park Code	PROS Service Area	Ranking Points
PRIORITY ONE- PROS AREA 1 SILVER SPRING/TAKOMA PARK				
MEADOWSIDE LOCAL PARK	MB	F08	1	1035
PARKSIDE HEADQUARTERS PROPERTY	MB	N09	1	610
ROCK CREEK STREAM VALLEY PARK	-	J28	1/2/3/5	605
WOODSIDE URBAN PARK	MB	A21	1	550
MONTGOMERY REGIONAL OFFICE-MRO PROPERTY	MB	N05	1	545
NOLTE LOCAL PARK	MB	D78	1	540



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ROSEMARY HILLS-LYTTONSVILLE LOCAL PARK	MB	D96	1	520
SLIGO CREEK STREAM VALLEY PARK	-	J30	1 and 5	520
LONG BRANCH LOCAL PARK	MB	D65	1	515
TAKOMA - PINEY BRANCH LOCAL PARK	MB	E11	1	515
PRIORITY TWO- PROS AREA 2 BETHESDA /CHEVY CHASE - N. BETHESDA				
NORWOOD LOCAL PARK	CJ	D07	2	705
CABIN JOHN LOCAL PARK	CJ	D19	2	640
MAPLEWOOD-ALTA VISTA LOCAL PARK	CJ	D71	2	615
STRATTON LOCAL PARK	CJ	E09	2	585
NORTH CHEVY CHASE LOCAL PARK	MB	D79	2	580
WESTMORELAND HILLS LOCAL PARK	CJ	E16	2	565
TILDEN WOODS LOCAL PARK	CJ	E12	2	540
RANDOLPH HILLS LOCAL PARK	MB	D93	2	490
FLEMING LOCAL PARK	CJ	D41	2	485
LYNNBROOK LOCAL PARK	MB	D69	2	475
PRIORITY THREE - PROS AREA 3 I-270 CORRIDOR				
STEWARTOWN LOCAL PARK	SG	E05	3	560
JOHNSON LOCAL PARK	SG	D37	3	525
CLEARSPRING LOCAL PARK	LB	D27	3	470
GUNNER'S BRANCH LOCAL PARK	BH	D52	3	450
QUINCE ORCHARD VALLEY NEIGHBORHOOD PARK	SG	B46	3	445
STRAWBERRY KNOLL LOCAL PARK	SG	E10	3	420
HUNTERS WOODS LOCAL PARK	SG	D23	3	415
NIKE MISSILE LOCAL PARK	SG	E62	3	415
CLARKSBURG NEIGHBORHOOD PARK	LB	E47	3	415
WATERS LANDING LOCAL PARK	BH	E61	3	410
FLOWER HILL LOCAL PARK	SG	E50	3	410
PRIORITY FOUR - PROS AREA 5 GEORGIA AVENUE				
LONGWOOD LOCAL PARK	OM	D67	5	725
EAST NORBECK LOCAL PARK	OM	D35	5	680
CAPITOL VIEW-HOMEWOOD LOCAL PARK	MB	D21	5	650
LAYHILL LOCAL PARK	OM	F06	5	595
VEIRS MILL LOCAL PARK	MB	E13	5	585
SLIGO-DENNIS AVENUE LOCAL PARK	MB	E01	5	585
SADDLEBROOK LOCAL PARK	WH	E54	5	580
KEN-GAR PALISADES LOCAL PARK	MB	D58	5	560
STONEBROOK LOCAL PARK	WH	E07	5	560
GREENWOOD LOCAL PARK	OM	D51	5	550

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PRIORITY FIVE - PROS AREA 6 EASTERN COUNTY				
CALVERTON GALWAY LOCAL PARK	ML	F03	6	870
HILLANDALE LOCAL PARK	ML	D54	6	790
CLOVERLY LOCAL PARK	OM	D29	6	635
COLUMBIA LOCAL PARK	OM	F02	6	580
GOOD HOPE LOCAL PARK	ML	D49	6	575
VALLEY MILL SPECIAL PARK	ML	L05	6	530
PILGRIM HILL LOCAL PARK	ML	D88	6	510
COLESVILLE LOCAL PARK	ML	D30	6	495
SPENCERVILLE LOCAL PARK	OM	E04	6	490
EDNOR LOCAL PARK	OM	D36	6	460
WEST FAIRLAND LOCAL PARK	ML	E15	6	415
PRIORITY SIX- PROS AREA 4 POTOMAC				
ROCKWOOD SPECIAL PARK	CJ	L08	4	700
AVENEL LOCAL PARK	CJ	F10	4	525
GLEN HILLS LOCAL PARK	CJ	F05	4	450
FALLS ROAD LOCAL PARK	CJ	D38	4	430
DARNESTOWN LOCAL PARK	SG	D31	4	385
DUFIEF LOCAL PARK	SG	D34	4	385
QUINCE ORCHARD KNOLLS LOCAL PARK	SG	D92	4	370
BEVERLY FARMS LOCAL PARK	CJ	D08	4	360
ABERDEEN LOCAL PARK	SG	E24	4	350
BIG PINES LOCAL PARK	SG	D09	4	345
PRIORITY SEVEN- PROS AREA 7 RURAL				
CAMP SENECA	BH	L02	7	505
OWENS LOCAL PARK	BH	D86	7	470
SUNDOWN ROAD LOCAL PARK	RC	F07	7	335
MOYER ROAD LOCAL PARK	LB	C17	7	325
LAYTONSVILLE LOCAL PARK	RC	D64	7	305
DICKERSON LOCAL PARK	BH	D33	7	270
WOODSTOCK EQUESTRIAN PARK	BH	L14	7	250
DAMASCUS NEIGHBORHOOD PARK	LB	B10	7	240
RICKMAN FARM HORSE PARK SPECIAL PARK	BH	L13	7	180
JOHN HAINES NEIGHBORHOOD PARK	LB	B29	7	180

5.9 FUNDING TIMELINE AND PROPOSED (BARRIER REMOVAL) PHASING PLAN

Funding for the barrier removal program will be provided by four different sources:

- Local (community based, funded by Commission bonds)

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- Non-local (county wide; funded by County general obligation bonds)
- Enterprise (fee based, pay as you go)
- EBR removals will be funded primarily through the Parks operating budget as an ongoing work program

Local Funding is directed at community based parks designated as Local, Neighborhood, or Urban, whereas Non-Local Funding is directed towards countywide parks such as regional and recreational parks, stream valley parks, and various special parks. These projects are funded through the Capital Improvement Program (CIP); each CIP cycle consists of 6 years. For the purposes of the Transition Plan, each CIP cycle is considered as a "Phase." The upcoming CIP FY 2017 through FY 2022, which constitutes Phase One, will incorporate accessibility improvements to selected amenities at the highest ranked parks within each funding category, both local and non-local. Phase Two includes the CIP cycle FY23- FY28, Phase Three is CIP FY 29-FY34, and Phase Four is CIP FY35-40..

The total anticipated funding amounts in Phase One are allocated as follows:

	<u>Non-Local</u>	<u>Local</u>
2017	\$ 800,000	\$850,000
2018	\$ 850,000	\$850,000
2019	\$ 850,000	\$700,000
2020	\$ 850,000	\$700,000
2021	\$ 850,000	\$700,000
<u>2022</u>	<u>\$ 850,000</u>	<u>\$700,000</u>
Totals	\$5,050,000	\$4,500,000

The amounts provided include overhead costs such as staffing, materials, overhead, program management, etc. associated with barrier removal. Therefore, the totals provided above have been adjusted to reflect these realities. Thus, the total funding available for each fund have been adjusted as follows:

	\$5,050,000		\$4,500,000
-(15%)	<u>\$ 757,500</u>	-(10%)	<u>\$ 450,000</u>
	\$4,292,500		\$4,050,000

Enterprise Funding: Varies each year *

* Enterprise is self-funded through user fees etc. Due to its self-sustaining requirement, the Enterprise Division itself will incur most, if not all, of the costs associated with ADA barrier removals within its facilities and the Department will perform barrier removals adjoining (and directly outside of) the facilities. Thus, barrier removals are subject to yearly budget fluctuation and financial constraints.

Beyond 2022, it is assumed that the level of funding will remain the same for each funding source for every phase. This provides the most conservative fiscal approach for the barrier removal process and duration. Thus Phases 2 and 3 and beyond are assumed to have \$4.29 million and \$4.05 million available for non-local and local funding respectively. As seen below, barrier removals for non-local parks will require 4 phases whereas local parks will require only 2 phases.

Barrier removal under the Easy Barrier Removal (EBR) program will be funded by the operating budget of the Department. The EBR work program will be conducted by primarily by maintenance and operations personnel. A substantial number of barriers which have been removed since the inception of the Self Evaluation have been accomplished under the EBR program.

Barrier removal for selected recurring amenities, based on the program access test of correcting 1 in 3 recurring amenities and all unique amenities, is listed on Appendix G, Part 2. The planned barrier removal does not include barriers which are deemed technically infeasible to correct, barriers identified under ABA regulations which do not apply to Montgomery Parks, playgrounds, employee work areas, residential housing, EBRs, or barriers associated with amenities not designated for accessibility improvements.

Accordingly, the barrier removals will be implemented within the parks as prioritized within the respective funding sources are summarized in Table 5.9.1 Barrier Removal Phasing Plan. The phasing plan for specific parks (both non-local and local) can be found in Table 5.9.2. The specific amenities to be made compliant can be found in Appendix G, Part 1. The combination of these tables and Appendix G, Parts 1 and 2, summarizes the Final Transition Plan. Amenity compliance, barrier removals, the program access test, and other activities associated with the accessibility program are all achieved through this implementation process.

Table 5.9.1 - Summary of (Barrier Removal) Phasing Plan

PHASE SUMMARY				
BARRIER REMOVAL PHASE	ESTIMATED COST OF BARRIER REMOVAL		TOTAL COST WITH 60% CONTINGENCY	
PHASE 1 NON-LOCAL	\$	2,604,215	\$	4,166,744
PHASE 2 NON-LOCAL	\$	2,523,786	\$	4,038,058
PHASE 3 NON-LOCAL	\$	2,512,932	\$	4,020,691
PHASE 4 NON-LOCAL	\$	208,910	\$	334,256
PHASE 1 LOCAL	\$	2,483,861	\$	3,974,178
PHASE 2 LOCAL	\$	1,867,155	\$	2,987,448
TOTALS	\$	12,200,859	\$	19,521,374

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Tables 5.9.2 Phasing Plan for Non-Local and Local Parks

PHASE ONE-CIP FY17-FY22 NON-LOCAL			
PARK RANK	PARK	PARK RANKING POINTS	COMMENTS
NL-1	South Germantown Recreational Park PROS 7 District 2	3685	(6) Unique Amenities: 1.Archery Range, 2. Mini Golf, 3. Golf Driving Range, 4. Splash Park, 5. Mooseum, 6. Discovery Center Stadium and building. Soccer Fields 23 and 24 park owned and maintained
NL-2	Cabin John Regional Park PROS 4 District 3	2760	Unique amenities- ice rink, campground, tai chi court
NL-3	Wheaton Regional Park PROS 5 District 7	2625	Unique amenities- botanical garden, carousel, nature center, ice rink, miniature train, sports pavilion
TOTAL ESTIMATED COST PHASE ONE- NON-LOCAL MAXIMUM ALLOWABLE AMOUNT \$4.29 M			
TOTAL ESTIMATED COST		\$ 2,604,215	
TOTAL ESTIMATED COST with 60% contingency		\$ 4,166,744	
NOTES:			
Parks are listed in order of priority ranking. Single asterisks indicate amenities not originally in SmartParks.			
Work Program: Actual scope of work will be determined at the time of renovation within the respective parks.			
Amenity Selection: Selections of specific amenities to be made compliant will be made at the time of barrier removal planning and construction. For each park, refer to Appendix G- Part 1 to determine the actual number of amenities to be made accessible.			
60% Contingency: 25% (site conditions, utility adjustments, mobilization) + 20% (design, consultants, surveying, construction management, permitting) , 15% (storm water management, sediments/erosion control, landscape related issues)			
Costs do not include Easy Barrier Removal (EBR's) which will be accomplished as part of the internal Maintenance/WorkOrder protocol, playgrounds, employee spaces, technical infeasibility, or trails and associated amenities.			



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PHASE TWO-CIP FY 23-28 NON-LOCAL			
PARK RANK	PARK	PARK RANKING POINTS	COMMENTS
NL-4	Rock Creek Regional Park PROS 5 District 4	2150	Unique amenities:amphitheater, archery, boat docks, nature center, Go Ape zipline course, Needwood Mansion (historic)
NL-5	Olney Manor Recreational Park PROS 5 District 3	1875	Unique amenity- raquetball court
NL-6	Black Hill Regional Park PROS 3 District 3	1730	Unique amenities-nature center, fishing pier, boat ramps
NL-7	Little Bennett Regional Park PROS 7 District 3	1660	Unique amenity – campground, historic structures (2)
NL-8	Martin Luther King Recreational Park PROS 6 District 2	1225	
NL-9	Ridge Road Recreational Park PROS 3 District 4	1120	Unique amenity- in line roller hockey rink
NL-10	Fairland Recreational Park PROS 6 District 3	1060	
L-1	Meadowbrook Local Park PROS 1 District 1	1035	Stables only
NL-11	Damascus Recreational Park PROS 7 District 3	995	
TOTAL ESTIMATED COST PHASE TWO- NON-LOCAL		MAXIMUM ALLOWABLE AMOUNT \$4.29 M	
	TOTAL ESTIMATED COST	\$ 2,523,786	
	TOTAL ESTIMATED COST with 60% contingency	\$ 4,038,058	
NOTES:			
<p>Parks are listed in order of priority ranking. Single asterisks indicate amenities not originally in SmartParks.</p> <p>Work Program: Actual scope of work will be determined at the time of renovation within the respective parks.</p> <p>Amenity Selection: Selections of specific amenities to be made compliant will be made at the time of barrier removal planning and construction. For each park, refer to Appendix G- Part 1 to determine the actual number of amenities to be made accessible.</p> <p>60% Contingency: 25% (site conditions, utility adjustments, mobilization) + 20% (design, consultants, surveying, construction management, permitting) , 15% (storm water management, sediment/erosion control, landscape related issues)</p>			



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2016 FINAL SELF EVALUATION AND TRANSITION PLAN

[UPDATE OF 2015 INTERIM TRANSITION PLAN]

AUGUST 2016

102516.12R000-00C.206

EMG PROJECT NO.:

Costs do not include Easy Barrier Removal (EBR's) which will be accomplished as part of the internal Maintenance/WorkOrder protocol, playgrounds, employee spaces, technical infeasibility, or trails and associated amenities.

ADA TRANSITION PLAN

2016 FINAL SELF EVALUATION AND TRANSITION PLAN
 [UPDATE OF 2015 INTERIM TRANSITION PLAN]
AUGUST 2016
 102516.12R000-00C.206

EMG PROJECT NO.:

PHASE THREE- CIP FY29-FY34 NON-LOCAL			
PARK RANK	PARK	PARK RANKING POINTS	COMMENTS
NL-12	Ovid Hazen Wells Recreational Park PROS 3 District 4	755	
NL-13	Rockwood Special Park PROS 4 District 4	700	
NL-14	Saddlebrook Local Park PROS 5 District 7	580	Park Police headquarters only
NL-15	Valley Mill Special Park PROS 6 District 2	530	
NL-16	Sligo Creek Stream Valley Park PROS 1 District 1	520	
NL-17	Agricultural History Farm Park PROS 5 District 2	515	unique amenity- historic house, activity center
NL-18	Woodlawn Cultural Special Park PROS 5 District 3	515	unique amenities- historic buildings and barn, Underground railroad
NL-19	Camp Seneca Special Park PROS 7 District 2	505	
NL-20	Rock Creek Sream Valley Units PROS 1 District 1	440	
NL-21	Josiah Henson Park PROS 2 District 1	330	unique amenity- entire park; upcoming park renovation scheduled for completion during Phase 1
NL-22	Northwest Branch Recreational Park PROS 5 District 3	320	unique amenity- museum
NL-23	Little Seneca Stream Valley Park PROS 3 District 1	280	unique amenity- model airpark
NL-24	Pope Farm Nursery PROS 5 District 2	260	
NL-25	Potomac Horse Center Special Park PROS 4 District 2	255	
TOTAL ESTIMATED COST PHASE THREE- NON-LOCAL MAXIMUM ALLOWABLE AMOUNT \$4.29 M			
TOTAL ESTIMATED COST		\$ 2,512,932	
TOTAL ESTIMATED COST with 60% contingency		\$ 4,020,691	



ADA TRANSITION PLAN

2016 FINAL SELF EVALUATION AND TRANSITION PLAN
[UPDATE OF 2015 INTERIM TRANSITION PLAN]
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102516.12R000-00C.206

EMG PROJECT NO.:

NOTES:

Parks are listed in order of priority ranking. Single asterisks indicate amenities not originally in SmartParks.

Work Program: Actual scope of work will be determined at the time of renovation within the respective parks.

Amenity Selection: Selections of specific amenities to be made compliant will be made at the time of barrier removal planning and construction. For each park, refer to Appendix G- Part 1 to determine the actual number of amenities to be made accessible.

60% Contingency: 25% (site conditions, utility adjustments, mobilization) + 20% (design, consultants, surveying, construction management, permitting) , 15% (storm water management, sediment/erosion control, landscape related issues)

Costs do not include Easy Barrier Removal (EBR's) which will be accomplished as part of the internal Maintenance/WorkOrder protocol, playgrounds, employee spaces, technical infeasibility, or trails and associated amenities.

ADA TRANSITION PLAN

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EMG PROJECT NO.:

PHASE FOUR- CIP FY35-FY40 NON-LOCAL			
PARK RANK	PARK	PARK RANKING POINTS	COMMENTS
NL-26	Reddy Branch Stream Valley Park PROS 5 District 1	250	unique amenity- Oakley Cabin
NL-27	Rickman Farm Horse Park Special Park PROS 7 District 2	180	
NL-13 NL-17 NL-27	Residences (min 5% of residence inventory required to be made accessible) Rockwood Special Park- PROS 4 District 4 Agricultural History Farm Park- PROS 5 District 2 Rickman Farm Horse Park Special Park PROS 7 District 2	700 515 180	
TOTAL ESTIMATED COSTS PHASE FOUR- NON-LOCAL MAXIMUM ALLOWABLE AMOUNT \$4.29 M			
	TOTAL ESTIMATED COST	\$ 208,910	
	TOTAL ESTIMATED COST with 60% contingency	\$ 334,256	
<p>NOTES:</p> <p>Parks are listed in order of priority ranking. Single asterisks indicate amenities not originally in SmartParks.</p> <p>Work Program: Actual scope of work will be determined at the time of renovation within the respective parks.</p> <p>Amenity Selection: Selections of specific amenities to be made compliant will be made at the time of barrier removal planning and construction. For each park, refer to Appendix G- Part 1 to determine the actual number of amenities to be made accessible.</p> <p>60% Contingency: 25% (site conditions, utility adjustments, mobilization) + 20% (design, consultants, surveying, construction management, permitting) , 15% (storm water management, sediment/erosion control, landscape related issues)</p> <p>Costs do not include Easy Barrier Removal (EBR's) which will be accomplished as part of the internal Maintenance/WorkOrder protocol, playgrounds, employee spaces, technical infeasibility, or trails and associated amenities.</p>			



PHASE ONE- CIP FY17-FY22 LOCAL			
PARK RANK	PARK	PARK RANKING POINTS	COMMENTS
L-1	Meadowbrook Local Park PROS 1 District 1	1035	Stables not included
L-2	Calverton Galway Local Park PROS 6 District 4	870	
L-3	Longwood Local Park PROS 5 District 1	725	
L-4	Norwood Local Park PROS 2 District 7	705	Minor CIP renovations scheduled for FY17/18
L-5	East Norbeck Local Park PROS 5 District 5	680	
L-6	Capitol View-Homewood Local Park PROS 5 District 9	650	
L-7	Cabin John Local Park PROS 2 District 6	640	FY17 CIP Project for minor renovations
L-8	Cloverly Local Park PROS 6 District 1	635	
L-9	Maplewood-Alta Vista Local Park PROS 2 District 5	615	
L-10	Nolte Local Park PROS 1 District 4	605	
L-11	Layhill Local Park PROS 5 District 3	595	
L-12	Stratton Local Park PROS 2 District 3	585	DOJ park site- scheduled for completion in FY 17
L-13	Veirs Mill Local Park PROS 5 District 8	585	
L-14	Sligo-Dennis Avenue Local Park PROS 5 District 9	585	
L-15	North Chevy Chase Local Park PROS 2 District 4	580	
L-16	Saddlebrook Local Park PROS 5 District 7	580	not including Park Police headquarters
L-17	Columbia Local Park PROS 6 District 1	580	

PHASE ONE- CIP FY17-FY22 LOCAL			
PARK RANK	PARK	PARK RANKING POINTS	COMMENTS
L-18	Good Hope Local Park PROS 6 District 1	575	Park subject to joint renovation project with Montgomery County
L-19	Westmoreland Hills Local Park PROS 2 District 7	565	
L-20	Stewartown Local Park PROS 3 District 6	560	
L-21	Ken-Gar Palisades Local Park PROS 5 District 8	560	DOJ park site- scheduled for completion in FY 17 for site amenities only
L-22	Stoneybrook Local Park PROS 5 District 8	560	
L-23	Woodside Urban Park PROS 1 District 1	550	Park CIP renovation project scheduled FY17/18 ; unique amenity- gymnasium
L-24	Greenwood Local Park PROS 5 District 1	550	
L-25	Long Branch Local Park PROS 1 District 4	540	
L-26	Tilden Woods Local Park PROS 2 District 1	540	
L-27	Glenfield Local Park PROS 5 District 7	540	unique amenity-bocce ball court
L-28	North Four Corners Local Park PROS 1 District 2	530	
L-29	Johnson Local Park PROS 3 District 7	525	Minor CIP FY17 renovation project
L-30	Avenel Local Park PROS 4 District 4	525	
L-31	Rosemary Hills-Lyttonsville Local Park PROS 1 District 1	520	
L-32	Wheaton Forest Local Park PROS 5 District 9	520	
L-33	Pilgrim Hill Local Park PROS 6 District 2	510	unique amenity- shuffleboard
L-34	Pinecrest Local Park PROS 1 District 2	490	CIP project FY18- site only

PHASE ONE- CIP FY17-FY22 LOCAL			
PARK RANK	PARK	PARK RANKING POINTS	COMMENTS
L-35	Randolph Hills Local Park PROS 2 District 2	490	
L-36	Dewey Local Park PROS 5 District 8	490	
L-37	Spencerville Local Park PROS 6 District 1	490	
L-38	Blueberry Hill Local Park PROS 5 District 4	480	
L-39	Argyle Local Park PROS 5 District 9	480	responsible party for YMCA building renovations to be determined
L-40	Lynnbrook Local Park PROS 2 District 4	475	
L-41	Sligo Avenue Neighborhood Park PROS 1 District 4	470	
L-42	Clearspring Local Park PROS 3 District 5	470	Upgrades to soccer field, softball, parking, proposed as part of DOJ park site; scheduled for completion in FY17
L-43	Owens Local Park PROS 7 District 1	470	
L-44	Cherrywood Local Park PROS 5 District 2	455	
L-45	Jesup-Blair Local Park PROS 1 District 4	450	
L-46	Glen Hills Local Park PROS 4 District 2	450	
L-47	Seven Locks Local Park PROS 2 District 6	445	
L-48	Woodacres Local Park PROS 2 District 7	445	

PHASE ONE- CIP FY17-FY22 LOCAL			
PARK RANK	PARK	PARK RANKING POINTS	COMMENTS
L-49	Quince Orchard Valley Neighborhood Park PROS 3 District 1	445	
TOTAL ESTIMATED COSTS PHASE ONE- LOCAL		MAXIMUM ALLOWABLE AMOUNT \$4.05 M	
	TOTAL ESTIMATED COST	\$ 2,483,861	
	TOTAL ESTIMATED COST with 60% contingency	\$ 3,974,177	
<p>NOTES:</p> <p>Parks are listed in order of priority ranking. Single asterisks indicate amenities not originally in SmartParks.</p> <p>Work Program: Actual scope of work will be determined at the time of renovation within the respective parks.</p> <p>Amenity Selection: Selections of specific amenities to be made compliant will be made at the time of barrier removal planning and construction. For each park, refer to Appendix G- Part 1 to determine the actual number of amenities to be made accessible.</p> <p>60% Contingency: 25% (site conditions, utility adjustments, mobilization) + 20% (design, consultants, surveying, construction management, permitting) , 15% (storm water management, sediment/erosion control, landscape related issues)</p> <p>Costs do not include Easy Barrier Removal (EBR's) which will be accomplished as part of the internal Maintenance/WorkOrder protocol, playgrounds, employee spaces, technical infeasibility, or trails and associated amenities.</p>			

PHASE TWO- CIP FY23-FY28 LOCAL			
PARK RANK	PARK	PARK RANKING POINTS	COMMENTS
L-50	Washington Square Neighborhood Park PROS 3 District 7	445	
L-51	Redland Local Park PROS 3 District 7	440	
L-52	Indian Spring Terrace Local Park PROS 1 District 4	435	
L-53	Long Branch-Wayne Local Park PROS 1 District 4	430	
L-54	Falls Road Local Park PROS 4 District 3	430	FY 17 CIP project
L-55	Blair Local Park PROS 1 District 2	420	
L-56	Strawberry Knoll Local Park PROS 3 District 6	420	
L-57	Newport Mill Local Park PROS 5 District 8	420	
L-58	Clarksburg Neighborhood Park PROS 3 District 4	415	
L-59	Hunters Woods Local Park PROS 3 District 6	415	
L-60	Nike Missile Local Park PROS 3 District 6	415	
L-61	West Fairland Local Park PROS 6 District 2	415	FY 17 CIP project for several amenities
L-62	Waters Landing Local Park PROS 3 District 3	410	
L-63	Mount Zion Local Park PROS 5 District 1	400	
L-64	Kings Local Park PROS 3 District 4	395	
L-65	Kemp Mill Estates Local Park PROS 5 District 7	395	CIP park renovation project currently under construction
L-66	Greenwich Neighborhood Park PROS 2 District 5	390	

PHASE TWO- CIP FY23-FY28 LOCAL			
PARK RANK	PARK	PARK RANKING POINTS	COMMENTS
L-67	Burning Tree Local Park PROS 2 District 6	385	
L-68	Fountain Hills Local Park PROS 3 District 2	385	
L-69	Darnestown Local Park PROS 4 District 1	385	
L-70	Dufief Local Park PROS 4 District 2	385	
L-71	Timberlawn Local Park PROS 2 District 1	380	
L-72	Ayrlawn Local Park PROS 2 District 5	375	DOJ park site
L-73	Olney Square Neighborhood Park PROS 5 District 2	375	
L-74	Parklawn Local Park PROS 5 District 6	375	
L-75	Glenmont Local Park PROS 5 District 8	370	Montgomery County Public Schools renovating softball field
L-76	McKenney Hills Neighborhood Park PROS 5 District 9	370	
L-77	Cannon Road Local Park PROS 6 District 2	370	
L-78	Concord Local Park PROS 2 District 6	365	
L-79	Ray's Meadow Local Park PROS 1 District 1	360	
L-80	Ellsworth Urban Park PROS 1 District 4	360	
L-81	Gunner's Lake Local Park PROS 3 District 2	360	
L-82	Leaman Local Park PROS 3 District 3	360	
L-83	Centerway Local Park PROS 3 District 6	360	

PHASE TWO- CIP FY23-FY28 LOCAL			
PARK RANK	PARK	PARK RANKING POINTS	COMMENTS
L-84	Beverly Farms Local Park PROS 4 District 3	360	
L-85	Kensington Cabin Local Park PROS 5 District 10	360	
L-86	Stonehedge Local Park PROS 6 District 4	360	
L-87	Bowie Mill Local Park PROS 5 District 2	355	
L-88	Southeast Olney Local Park PROS 5 District 3	355	
L-89	Winding Creek Local Park PROS 5 District 8	355	
L-90	Aberdeen Local Park PROS 4 District 1	350	FY 17 CIP project
L-91	Burtonsville Local Park PROS 6 District 1	350	
L-92	South Gunner's Branch Local Park PROS 3 District 1	345	
L-93	Fox Chapel Neighborhood Park PROS 3 District 5	345	
L-94	Big Pines Local Park PROS 4 District 2	345	
L-95	Peachwood Neighborhood Park PROS 6 District 1	345	
L-96	Wall Local Park PROS 2 District 1	340	
L-97	Aspen Hill Local Park PROS 5 District 6	340	
L-98	Manor Oaks Local Park PROS 5 District 1	335	
L-99	Sundown Road Local Par PROS 7 District 4	335	
L-100	Leland Neighborhood Park PROS 2 District 4	330	

PHASE TWO- CIP FY23-FY28 LOCAL			
PARK RANK	PARK	PARK RANKING POINTS	COMMENTS
L-101	Willard Avenue Neighborhood Park PROS 2 District 7	330	
L-102	Cedar Creek Local Park PROS 3 District 1	330	
L-103	Wood Local Park PROS 5 District 6	330	
L-104	Wheaton-Claridge Local Park PROS 5 District 8	330	FY 17-18 CIP project
L-105	Broadacres Local Park PROS 1 District 3	325	
L-106	Bullis Local Park PROS 1 District 4	325	
L-107	Bauer Drive Local Park PROS 5 District 6	325	DOJ park site, tennis courts completed
L-108	Moyer Road Local Park PROS 7 District 3	325	
L-109	Waring Station Local Park PROS 3 District 2	320	
L-110	Norbeck-Muncaster Mill Neighborhood Park PROS 5 District 4	320	
L-111	Heritage Farm Neighborhood Park PROS 4 District 4	315	
L-112	Laytonsville Local Park PROS 7 District 4	305	
L-113	Sligo Creek North Neighborhood Park PROS 1 District 5	295	
L-114	Fernwood Local Park PROS 2 District 5	285	
L-115	Clarksburg Village North Local Park PROS 3 District 4	280	
L-116	Forest Glen Neighborhood Park PROS 5 District 9	275	
L-117	Opal A. Daniels Neighborhood Park PROS 1 District 5	270	

PHASE TWO- CIP FY23-FY28 LOCAL			
PARK RANK	PARK	PARK RANKING POINTS	COMMENTS
L-118	Dickerson Local Park PROS 7 District 1	270	
L-119	Forest Grove Neighborhood Park PROS 5 District 9	260	
L-120	Parkland Local Park PROS 5 District 6	255	
L-121	Garrett Park Estates Local Park PROS 2 District 2	235	
L-122	Olney Acres Neighborhood Park PROS 5 District 2	225	
L-123	Sligo Mill Overlook Neighborhood Park PROS 1 District 5	205	
TOTAL ESTIMATED COSTS PHASE TWO- LOCAL		MAXIMUM ALLOWABLE AMOUNT \$4.05 M	
TOTAL ESTIMATED COST		\$ 1,867,155	
TOTAL ESTIMATED COST with 60% contingency		\$ 2,987,447	
<p>NOTES:</p> <p>Parks are listed in order of priority ranking. Single asterisks indicate amenities not originally in SmartParks.</p> <p>Work Program: Actual scope of work will be determined at the time of renovation within the respective parks.</p> <p>Amenity Selection: Selections of specific amenities to be made compliant will be made at the time of barrier removal planning and construction. For each park, refer to Appendix G- Part 1 to determine the actual number of amenities to be made accessible.</p> <p>60% Contingency: 25% (site conditions, utility adjustments, mobilization) + 20% (design, consultants, surveying, construction management, permitting) , 15% (storm water management, sediment/erosion control, landscape related issues)</p> <p>Costs do not include Easy Barrier Removal (EBR's) which will be accomplished as part of the internal Maintenance/WorkOrder protocol, playgrounds, employee spaces, technical infeasibility, or trails and associated amenities.</p>			

5.10 OPINIONS OF PROBABLE COST FOR PHYSICAL BARRIERS

The estimates for the physical barrier removals noted within individual SmartParks/EAM designated facility evaluations and parks are project planning level estimates only, and are not construction estimates. Additional estimating efforts may be required to define the true cost of the corrective measures to eliminate ADA barriers. Planning level estimates do not represent cost estimates of engineered construction drawings.

The estimates for the physical barrier items noted within this ADA 2016 Final Transition Plan are based on construction costs developed by construction resources such as R.S. Means and Marshall & Swift, EMG's experience with past costs for similar properties, historical unit costs of work undertaken by Montgomery Parks, cost indexes, and assumptions regarding future economic conditions. All cost estimates are in present day dollars.

The 2016 Final Transition Plan utilizes contingency estimates based upon actual recent construction projects and the current regulatory environment. The contingency estimates utilized include: 25% for general site conditions, unforeseen utility adjustments, mobilization, subcontractor markups plus 15% for locally mandated requirements such as stormwater management, sediment/erosion controls and landscaping/tree preservation, plus an additional 20% for surveys, design consultants, construction management, and permitting fees.

6 SUMMARY OF THE 2016 FINAL TRANSITION PLAN

6.1 SUMMARY OF THE 2016 FINAL TRANSITION PLAN

The 2016 Final Transition Plan to the Department of Justice satisfies the requirements of the Americans with Disabilities Act for a Self-Evaluation of the public park system in Montgomery County. The 2011 Settlement Agreement established a five-year period (2011-2016) for M-NPPC Montgomery County Parks to complete the Self-Evaluation and Final Transition Plan.

The United States Department of Justice's (DOJ) regulations implementing Title II of the ADA dictate that local governments must evaluate their services, programs, policies, and practices and identify barriers that may limit accessibility for people with disabilities, and develop transition plans describing how they will address identified barriers. This Self-Evaluation and Final Transition Plan report for M-NPPC Montgomery County Parks provides strategies for compliance with Title II of the ADA and compliance with the requirements of the 2011 Department of Justice Settlement Agreement.

The total number of barriers at this time is approximately 13,600. The total estimated cost of all barrier removal for facilities evaluated is approximately \$31 million. This total includes a planning level estimate of approximately \$25.9 million for barrier removals included in the 2010 ADA Standards, and approximately \$5.1 million for barrier removal covered in the ABA Outdoor Developed Area Guidelines. Adding a 60% contingency, the total planning level estimate for all barrier removals is approximately \$49.5 million. However, the proposed strategy in this FTP (of barrier removal for 1 in 3 recurring amenities) yields a total estimated cost of barrier removal in the Phasing Plan of \$12.2 million in base costs, and with the 60% contingency, \$19.5 million. It should be noted that the cost for barrier removals regulated in the ABA Outdoor Developed Area Guidelines and costs associated with the EBR program are not included in the Phasing Plan totals. The EBR program requires \$6.7 million for barrier removal. The process to achieve compliance and the timeline required to remove the necessary barriers and provide accessibility throughout the Parks system is significant, currently estimated to span 4 CIP cycles (phases), or approximately 24 years.

The 2016 Final Transition Plan is a snapshot in time of the park system and its ongoing ADA compliance efforts to evaluate and prioritize ADA barrier removal throughout the M-NPPC Montgomery Parks system. It reveals a glimpse into the size and complexity of the park system itself as well as provides a general overview of the challenges confronting Montgomery Parks in meeting the requirements of Title II and the 2010 ADA Standards for Accessible Design. The Final Transition Plan is, and will be, a living document, not a static view of the existing state of ADA compliance at Montgomery Parks. As such, it will be modified and updated on a regular basis to reflect barrier removal efforts, changes in economic conditions, new and revised strategies, and reflect ongoing public input. In the future, County-wide demographics will vary from the current demographic composition of the County. Public preferences for recreational types may change, while funding priorities and funding levels may change as well.

The FTP will require ongoing modification as conditions and priorities are changed, new ADA requirements are issued by DOJ, and/or unanticipated policy/fiscal needs or shifts occur. To further complicate the difficulty of setting priorities, the Parks system has long been intertwined with outside entities such as the Recreation Department, Public Schools, vendors, lessees and other partners, so that responsibilities for corrective actions on parklands extends beyond M-NPPC Montgomery Parks. Flexibility and adaptability will continue to be vital tools in all future endeavors relative to accessibility, system compliance, and public use of all facilities.

The FTP is based on the previous assessments of individual facilities included in the earlier Interim Transition Plans, information gleaned from various sources including Vision 2030, the 2012 PROS Plan, the Capital Improvement Programs, as well as information supplied directly by Montgomery Parks. The combination of all the data is part of the Final Transition Plan, and will continue to be utilized in assisting in the development of various future decision criteria and rankings as they relate to parks, amenities, and barriers.

The Final Transition Plan reflects M-NPPC Montgomery Parks' commitment to achieving accessibility within the park system and demonstrates substantial and sustainable progress to date. Yet much remains to be done. The ADA effort has affected every division within M-NPPC Montgomery Parks, and has become an integral part of daily operations. The goal of an integrated effort toward serving the disabled community, as well as the broader user base is the keystone of the Final Transition Plan as well as all future efforts by Montgomery Parks.

6.2 LOOKING AHEAD – BEYOND THE 2016 FINAL TRANSITION PLAN

This Final Transition Plan has dealt primarily with the requirements of the 2011 Settlement Agreement, physical and programmatic barrier removals, the 2010 ADA Standards, and Title II compliance. All are legal requirements establishing the minimum thresholds for accessibility for all individuals and participants in the Montgomery Parks system. Beyond these minimums however, Montgomery Parks hopes to achieve more than the aforementioned minimums. Initiatives the Department hopes to pursue include the following:

Access to Open Space /Unimproved Trails

One of the signature assets of Montgomery County Parks is its system of undisturbed open space and natural areas as well as its network of unimproved trails. The benefits to the public including those with disabilities is significant. Although specific adopted design standards do not currently exist, access to these areas is and will be an important mission of the Department in the years ahead. Initially, the Department will identify possible parking areas and trailheads which provide or could provide reasonable levels of accessibility using the ABA Outdoor Guidelines. Ultimately, the goal is to provide reasonable access to approximately of the 5% of unimproved trails in the County.

Promote and Increase Accessible Amenities and Inclusion in Park and Facility Settings

As part of the upcoming update of the PROS (Parks and Recreation Open Space) Plan in 2017, a number of suggestions may be recommended including:

- Repurpose/develop land into multi-generational parks for all ages and abilities to recreate together in an inclusive setting including; develop and/or enhance sensory trails, gardens and spaces.
- Develop/enhance specific trails into adventure trails/courses for individuals with limited mobility who want to increase their strength, stamina and individual wellness programs.
- A partnership with Walter Reed Medical and Rehabilitation Center located in the county to accommodate wounded soldiers as part of their overall wellness/ treatment/recovery plan or similar organization may be considered.
- Possibly provide access for students to utilize parks and natural spaces to engage in programs/activities as part of the STEM (Science, Technology, Engineering, and Mathematics) approach to education.

Develop Senior Friendly Parks

The Department is also considering working with a regional team partnering with the World Health Organization (WHO), AARP, local Montgomery County agencies and others to assist in the implementation of the WHO Global Age-Friendly Cities initiative for the aging population. This initiative is to enhance amenities to be more age-friendly. Some of the pillars of this initiative include:

- Outdoor spaces and buildings
- Social participation
- Respect and social inclusion
- Communication and information

These pillars are very similar to the mission of the Montgomery County Parks Department, and the Americans with Disabilities Act.

Utilize Technology/Website Accessibility to Provide Current and More Accurate Information to the Public

In the coming years, information /data concerning accessible parks, amenities, and/or programs needs to be readily available to the public. It is anticipated that this information will be developed and housed in a Geographic Information System (GIS) database. Information stored and regularly updated in GIS will be linked to the Parks Website thus enabling any person the ability to easily and readily determine the location or type of accessible amenities anywhere in the Montgomery County park system. The GIS database may be linking to the SmartParks/EAM system thereby resulting in current “live” updates of parks and the accessible features within the system. The goal to implement these or similar features prior to the end of the Phase One cycle of the Transition Plan.

7 APPENDICES

APPENDIX A: ADA TITLE II REGULATIONS

APPENDIX B: SUMMARY OF THE M-NCPPC MONTGOMERY PARK SYSTEM

APPENDIX C: FACILITIES BY PROS SERVICE AREAS AND PARKS BY
MAINTENANCE AREAS

APPENDIX D: FACILITIES EVALUATED

APPENDIX E: PROGRAM ACCESS TEXT (DISTRICT MAPPING)

APPENDIX F: BARRIER RANKING GUIDE

APPENDIX G: PART ONE: AMENITY RANKING
PART TWO: PRIORITIZATION

APPENDIX H: EASY BARRIER REMOVAL (EBR) PROGRAM

APPENDIX I: CAPITAL IMPROVEMENT PROGRAM (CIP) FY2017- FY 2022

APPENDIX J: PART ONE: PROGRAM ACCESS STANDARD OPERATION (SOP)
PART TWO: PROGRAM ACCESS MARKETING PLAN

APPENDIX K: ADA TRANSITION PLAN IMPLEMENTATION FLOW CHART

APPENDIX L: TERMINOLOGY