

Columbus Recreation & Parks Department
**Americans with Disabilities Act (ADA)
Self-Evaluation & Transition Plan**

February 2025

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In Association with:



The City of Columbus Recreation and Parks Department (CRPD) has prepared this transition plan with the assistance of the consultant team led by Kimley-Horn and Associates, Inc., along with its subcontractor team member DLZ National, Inc. The consultant team, the ADA Coordinator, and the contributing members of the CRPD team are responsible for developing the ADA Self-Evaluation and Transition Plan report and program.

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ABBREVIATIONS

ABA – Architectural Barriers Act

ADA – Americans with Disabilities Act

CFR – Code of Federal Regulations

CIP – Capital Improvement Program

DOJ – United States Department of Justice

EITA – Electronic and Information Technology Accessibility

FHWA – Federal Highway Administration

MUTCD – Manual on Uniform Traffic Control Devices

PROWAG – Proposed Public Rights-of-Way Accessibility Guidelines

PSA – Programs, Services, and Activities

WAVE – Web Accessibility Evaluation Tool

CRPD – Columbus Recreation and Parks Department

1.0 INTRODUCTION



1.1 PURPOSE

The purpose of this Americans with Disabilities Act (ADA) Self-Evaluation and Transition Plan is to summarize the activities completed to date related to ADA compliance, identify physical and programmatic barriers to access, and create a roadmap for the Columbus Recreation and Parks Department (“CRPD”) to update their ADA Transition Plan over time. Public Pedestrian facilities at CRPD parks were reviewed for compliance with current ADA standards and guidelines as described in **Section 1.5** below. Prioritization methodology for evaluating and implementing improvements has been developed based on the applicable 2010 ADA Standards and 2023 Proposed Public Rights-of-Way Accessibility Guidelines (PROWAG), and the details are provided in this document.

The document includes an overview of the ADA, reviews of current conditions and existing physical barriers. It includes a prioritization and recommendations based upon compliance against the ADA and guidance from the Federal Highway Administration and the U.S. Department of Justice (DOJ) to improve accessibility for the public and City Staff. An additional component of this ADA Self Evaluation and Transition are estimations of probable costs and identification of key aspects to inform the capital improvement budget for park property improvements.



1.2 LEGISLATIVE MANDATE

The Americans with Disabilities Act (ADA) which was initiated in 1990, is a civil rights law that mandates equal opportunity for individuals with disabilities. The ADA prohibits discrimination in access to jobs, public accommodations, government services, public transportation, and telecommunications. Title II of the ADA also requires that all programs, services, and activities (PSAs) of public entities provide equal access for individuals with disabilities.

CRPD is currently evaluating the programs, services, and activities that are conducted by city staff and the public in tandem with this self-evaluation. The outcome of these efforts will be used to improve how staff have access to and conduct programs in addition to making the necessary accommodations for the public.



1.3 ADA SELF-EVALUATION AND TRANSITION PLAN DEVELOPMENT REQUIREMENTS AND PROCESS

CRPD is obligated through the ADA and have a proven history of observing the requirements of Title I in its human resources practices and employment outreach programs. With the emphasis upon serving the public and the number of events educational programs and recreational leagues, CRPD has emphasized continuous improvements towards Title II and the inclusiveness in policies, programs and services. With over 500 properties managed by CRPD, Title IV and V have continued to be a major priority. This includes the requirements from the 2010 updates and the 2023 PROWAG standards that apply to facilities and physical holdings. There continues to be annual allocations of funding to address any deficiencies and make

improvements to allow for ease of access and provide direction within parkland properties and the public facilities.

Title II has the broadest impact on CRPD. Included in Title II are administrative requirements for all government entities employing more than 50 people. These administrative requirements are:

- Completion of a Self-Evaluation;
- Development of an ADA complaint procedure;
- Designation of at least one (1) person who is responsible for overseeing Title II compliance; and
- Development of a Transition Plan to schedule the removal of barriers uncovered by the Self-Evaluation process. The Transition Plan will become a working document until all barriers have been addressed.

This document is intended to identify the potential scope of work needed to address any barriers and the probable costs associated with the work. This is to be a phased plan that in a weighted ranking to remove the most critical barriers identified first. Project scopes will be combined whenever possible to organize the work to maximize the outcome and result in the benefit of funding efficiencies. This document describes the process developed to complete the evaluation of CRPD's PSAs and facilities, provides possible solutions to remove programmatic barriers, and presents a Transition Plan for the modification of facilities and public rights of way to improve accessibility, which will guide the planning and implementation of necessary program and facility modifications. The ADA Self-Evaluation and Transition Plan is significant in that it establishes CRPD's ongoing commitment to the development and maintenance of PSAs and facilities that accommodate all its citizenry.



1.4 DISCRIMINATION AND ACCESSIBILITY

Program accessibility means that, when viewed in its entirety, each program is readily accessible to and usable by individuals with disabilities. This is necessary not only for individuals with mobility needs but also for individuals with sensory and cognitive disabilities.

Accessibility applies to all aspects of a program or service, including but not limited to physical access, advertisement, orientation, eligibility, participation, testing or evaluation, provision of auxiliary aids, transportation, policies, and communication.

The following are examples of elements that should be evaluated for barriers to accessibility:

1.4.1 PHYSICAL BARRIERS

- Parking
- Path of travel to, throughout, and between park buildings and amenities
- Doors
- Service counters
- Restrooms
- Drinking fountains

- Public telephones
- Connections to path of travel along sidewalk corridors within public rights-of-way
- Access to pedestrian equipment at signalized intersections

1.4.2 PROGRAMMATIC BARRIERS

- Park and building signage
- Customer communication and interaction
- Non-compliant sidewalks or curb ramps
- Emergency notifications, alarms, and visible signals
- Participation opportunities for CRPD-sponsored events

1.4.3 ONGOING ACCESSIBILITY IMPROVEMENTS

CRPD PSAs and facilities evaluated during the Self-Evaluation will continue to be evaluated on an ongoing basis, and the ADA Transition Plan will be revised to account for changes that have been or will be completed since the initial Self-Evaluation. This Plan will be posted on CRPD's website for review and consideration by the public. This effort was an initial phase of work that identified the properties and all physical features of twenty-nine parks with the most interaction with the public including the Community Centers; recreational fields and courts; parking lots; park shelters; and walking/greenway trails.

Future phases identify additional park properties in weighted ranking that have a higher rate of interaction through programs, services, and community services.

An updated system of departmental tracking and reporting is intended to provide information on an as needed basis to be included in the scope of park and facility improvements.

1.4.4 COLUMBUS RECREATION AND PARKS DEPARTMENT APPROACH

The Transition Plan provides the framework for achieving equal access to CRPD's PSAs within a reasonable timeframe. CRPD staff believes accommodating persons with disabilities is essential to good customer service, and ensures the quality-of-life Columbus residents seek to enjoy.

CRPD should make reasonable modifications to PSAs when necessary to avoid discrimination based on disability. That is unless the department can demonstrate that making the modifications will fundamentally alter the nature of the program, service, or activity. CRPD will not charge individuals with disabilities to cover the cost of making PSAs accessible.

1.4.5 EXCEPTIONS AND EXEMPTIONS

The ADA states that a local government agency is not required to take any action that would create any undue financial or administrative burden for the public entity, create a hazardous condition for other people, or threaten or destroy the historic significance of a historic property.

In determining whether an alteration would impose an undue financial or administrative burden on a covered entity, factors to be considered include:

- i. The nature and cost of the alteration is needed.
- ii. The overall financial resources of the facility or facilities involved in the provision of the reasonable accommodation; the number of persons employed at such facility; the effect on expenses and resources, or the impact otherwise of such accommodation upon the operation of the facility
- iii. The overall financial resources of the covered entity; the overall size of the business of a covered entity with respect to the number of its employees; the number, type, and location of its facilities
- iv. The type of operation or operations of the covered entity, including the composition, structure, and functions of the workforce of such entity; the geographic separateness, administrative, or fiscal relationship of the facility or facilities in question to the covered entity.

Alterations to historic facilities have the potential to threaten or destroy those characteristics that were of significance. Many City of Columbus facilities are located on the National Register of Historic Places and therefore CRPD has made it a practice to verify the status as projects have been identified for improvements. This verification is based on a search of the National Register of Historic Places NPGallery Database (<https://npgallery.nps.gov/nrhp>) and the associated geodatabase (<https://irma.nps.gov/DataStore/Reference/Profile/2210280>). Beyond the National Register, CRPD maintains a geodatabase of Historical and Cultural Resources located within its properties. Due to the role that the park system has in stewarding these resources, CRPD must review alterations against the additional protections necessary for these structures, facilities or landmarks.

According to the requirements of the ADA, CRPD is not necessarily required to make each of its existing facilities accessible to and usable by individuals with disabilities. If CRPD determines a proposed action would generate undue financial or administrative burden, create a hazardous condition for other people, or threaten or destroy the historic significance of a historic property, CRPD has the responsibility to communicate and document the decision and the methodology to reach it. If an action would result in such an alteration or such burdens, CRPD shall take any other actions that would not result in such an alteration or such burdens, but would nevertheless ensure that individuals with disabilities receive the benefits or services provided by CRPD.



1.5 NEW CONSTRUCTION AND ALTERATIONS

If the start date for construction was on or after March 15, 2012, all newly constructed or altered state and local government facilities must comply with the 2010 ADA Standards. Before that date, the 1991 Standards (without the elevator exemption), the Uniform Federal Accessibility Guidelines, or the 2010 ADA Standards may be used for such projects when the start of construction commences on or after September 15, 2010.

The most recent standards are the 2010 ADA Standards, which set the minimum requirements – both scoping and technical – for newly designed and constructed or altered state and local government facilities, public accommodations, and commercial facilities to be readily accessible to and usable by individuals with disabilities. It is effectuated by 28 Code of Federal Regulations (CFR) 35.151 and the 2004 Americans with Disabilities Act Accessibility Guidelines (ADAAG). However, the FHWA and DOJ recommend using PROWAG for designing facilities within the public rights-of-way as a best practice until it is adopted at the federal level.

2010 ADA Standards

The Department of Justice’s revised regulations for [Titles II](#) and [III](#) of the Americans with Disabilities Act of 1990 (ADA) were published in the Federal Register on September 15, 2010. These regulations adopted revised, enforceable accessibility standards called the 2010 ADA Standards. On March 15, 2012, compliance with the 2010 ADA Standards was required for new construction and alterations under [Titles II](#) and [III](#). March 15, 2012 is also the compliance date for using the 2010 ADA Standards for program accessibility and barrier removal.

PROWAG

The U.S. Access Board recently published new guidelines under the ADA and the Architectural Barriers Act (ABA) that address access to sidewalks and streets, crosswalks, curb ramps, pedestrian signals, on-street parking, and other components of public rights-of-way. These guidelines also review shared-use paths, which are designed primarily for use by bicyclists and pedestrians for transportation and recreation purposes. The Accessibility Guidelines for Pedestrian Facilities in the Public Rights-of-Way (PROWAG) provide minimum guidelines for the accessibility of pedestrian facilities in the public rights-of-way. When these guidelines are adopted, with or without modifications, as accessibility standards in regulations issued by other federal agencies implementing the ADA, Section 504 of the Rehabilitation Act, and the ABA, compliance with those enforceable accessibility standards is mandatory. The final rule was published on August 8, 2023, and becomes effective on September 7, 2023. PROWAG is the recommended best practice and can be considered the state of the practice that could be followed for areas not fully addressed by the 2010 ADA Standards.

MUTCD

Traffic control devices shall be defined as all signs, signals, markings, and other devices used to regulate, warn, or guide traffic, placed on, over, or adjacent to a street, highway, pedestrian facility, bikeway, or private road open to public travel by authority of a public agency or official having jurisdiction, or, in the case of a private road, by authority of the private owner or private official having jurisdiction. The Manual on Uniform Traffic Control Devices is incorporated by reference in 23 CFR, Part 655, Subpart F, and shall be recognized as the national standard for all traffic control devices installed on any street, highway, bikeway, or private road open to public travel in accordance with 23 U.S.C. 109(d) and 402(a). The policies and procedures of the FHWA to obtain basic uniformity of traffic control devices shall be as described in 23 CFR 655, Subpart F.



1.6 EXISTING DEPARTMENT PROGRAMS THAT IMPLEMENT ADA UPGRADES

CRPD currently implements ADA-compliant designs through the following efforts:

- The Columbus Public Service Department is responsible for maintenance of and improvements to the right of way to maintain accessible routes. The areas included in these improvements are curb and gutter, pavement, pothole repairs, and sidewalks.
- CRPD has an annual capital improvement project that identifies approximately two miles of sidewalks, roadways and parking lots that need improvements to remain accessible for the public. These are often at Community Centers, which connect schools and the neighborhoods.
- All City of Columbus capital improvement projects including CRPD conform to the Columbus Construction and Material Specifications manual, most recent edition 2018 and the CRPD design manual of standardized drawings and specifications. CRPD seeks alternate funding sources through government agencies such as the Ohio Department of Natural Resources grants for NatureWorks, Clean Ohio and Land and Water Conservation Fund. In addition, funding has been leveraged from the National Recreation and Parks Association, City Parks Alliance, the U.S. Department of the Interior and the National Park Service.

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2.0 PUBLIC OUTREACH



2.1 PUBLIC AND ADA ADVISORY COMMITTEE MEETING

The regulations which implement the ADA require public entities to provide an opportunity to interested persons and organizations to participate in the self-evaluation process by submitting comments (28 C.F.R. § 35.105(a)). CRPD included local organizations, government agencies, neighborhood leaders such as the Columbus Advisory Committee on Disability Issues (CACDI) and CRPD Staff to form an ADA Advisory Committee. CRPD then hosted an ADA Advisory Committee meeting, which was also open to members of the public, to provide a summary of the transition planning process and receive feedback on any concerns related to accessibility. The meeting occurred on March 20th, 2024, from 4:00-6:00 PM. CRPD will continue to solicit feedback from the public on the CRPD ADA Audit and Transition Plan.

Feedback received at the ADA Advisory Committee meeting was included in the web survey summary in [Appendix A](#).



2.2 WEB SURVEY

CRPD also developed a web survey open to the public. The survey was designed to help the Department identify areas of greatest concern to the public and help provide better access to the community. The survey was made available on CRPD's web page, sent out through social media, and emailed to the ADA Advisory Committee for redistribution. Feedback was documented between the start date of December 2023 and the end date of April 2024. The survey was made available via the following link:

https://www.surveymonkey.com/r/CRPD_ADA

The survey garnered 35 responses. 52% of those surveyed answered positively when asked about the accessibility of CRPD's facilities, such as parks and community centers, and 85% answered positively when asked about any communication barriers. Whetstone Park, Goodale Park, Schiller Park, and Antrim Park were the most visited facilities by respondents. The summaries for the web survey were included in [Appendix A](#).



2.3 WEB MAP

CRPD also developed an online map to allow the public to identify specific locations where they experienced issues related to accessibility, safety, connectivity, or suggestions for accessibility improvements that were needed in Columbus. The map was made available on CRPD's web page, sent out through social media, and emailed to the ADA Advisory Committee for redistribution. The web map was open for feedback between the start date of December 2024 and the end date of April 2024. The map was made available via the following link:

<https://wikimapping.com/CRPD-ADA-Transition-Plan.html>

At the conclusion of the feedback period, the web map did not garner any input from the public. The web map will continue to be made available for feedback as necessary and responses will be combined with the web survey to help CRPD locate areas where the public requests accessibility.

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3.0 SELF-EVALUATION AND SUMMARY OF FINDINGS

The CRPD ADA Transition Plan will be regularly updated to include the results of ADA compliance assessments of the programs, services, and activities provided to employees and the public. The Plan will also be updated to include the findings from facility evaluations of all CRPD-owned/maintained parks, buildings and associated parking lots, park sidewalks/trails and associated curb ramps, and park sidewalks that overlap the public rights-of-way and associated curb ramps. It is anticipated that programs, services, activities, and additional facilities evaluations will be completed annually until all elements have been reviewed for ADA compliance.



3.1 PROGRAMS, SERVICES, AND ACTIVITIES OVERVIEW AND ADMINISTRATIVE REQUIREMENTS

Under the ADA, CRPD is required to complete a Self-Evaluation of its facilities, programs, policies, and practices. The Self-Evaluation identifies and provides possible solutions to policies and practices that are inconsistent with Title II requirements. To be compliant, the Self-Evaluation should consider all department Programs, Services, and Activities (PSAs) and the policies and practices CRPD uses to implement its various programs and services. To comply with the requirements of the plan, CRPD must take corrective measures to achieve program accessibility through several methods, including, but not limited to:

1. Relocation of programs to accessible facilities;
2. Modifications to existing programs so they are offered in an accessible manner;
3. Structural methods such as altering an existing facility;
4. Policy modifications to ensure nondiscrimination; and
5. Providing auxiliary aids to produce effective communication.

When choosing a method of providing program access, CRPD should attempt to give priority to the method that promotes inclusion among all users, including individuals with disabilities.

PSAs offered by CRPD to the public must be accessible. Accessibility applies to all aspects of a program, services, or activity, including advertisement, orientation, eligibility, participation, testing or evaluation, physical access, provision of auxiliary aids, transportation, policies, and communication.

However, CRPD does not have to take any action that will result in a fundamental alteration in the nature of a program or activity, create a hazardous condition for other people, or result in an undue financial and/or administrative burden. This determination should generally be made by the ADA/504 Coordinator and/or by appropriate staff in consultation with the City's ADA/504 Coordinator, with the Recreation and Parks Director holding the ultimate decision-making authority. Any determination must be accompanied by a written statement detailing the reasons for reaching the determination. The appropriate staff may include but is not limited to the Design and Construction Strategic Administrators, the Capital and Strategic Planning Administrators, the Safety Officer and the Administrator of the affected Program, Service or Activity.

The determination of undue burden must be based on an evaluation of all resources available for use. If a barrier removal action is judged unduly burdensome, CRPD must consider all other options for providing access to ensure that individuals with disabilities receive the benefits and services of the program or activity. This process must be fully documented.

3.1.1 ADA/504 COORDINATOR (TITLE I / TITLE II)

Under ADA Title II, when a public entity has 50 or more employees based on an entity-wide total count, the entity is required to designate at least one (1) qualified, responsible employee to coordinate compliance with ADA requirements. This individual's name, office address, and telephone number must be available and advertised to employees and the public. This allows someone to assist with questions and concerns regarding disability discrimination to be easily identified.

The City of Columbus has appointed Angie Wise as its ADA/504 Coordinator for Title II. Below is the ADA Coordinator's contact information.

Angie Wise, ADA/504 Coordinator
77 N. Front St.
Columbus, OH 43215
Office: 614-645-8029
Email: AMWise@columbus.gov

The City of Columbus has posts this information on their ADA webpage here:
<https://www.columbus.gov/Government/Departments/Human-Resources/ADA-Compliance>

CRPD staff work closely with the City's ADA Coordinator to ensure that CRPD complies with the ADA.

3.1.2 ROLES AND RESPONSIBILITIES OF THE ADA/504 COORDINATOR

Below is a list of qualifications for ADA Coordinators that are recommended by the U.S. Department of Justice:

- Familiarity with the entity's structures, activities, and employees;
- Knowledge of the ADA and other laws addressing the rights of people with disabilities, such as Section 504 of the Rehabilitation Act;
- Experience with people with a broad range of disabilities;
- Knowledge of various alternative formats and alternative technologies that enable individuals with disabilities to communicate, participate, and perform tasks;
- Ability to work cooperatively with local entities and people with disabilities;
- Familiarity with any local disability advocacy groups or other disability groups;
- Skills and training in negotiation and mediation; and
- Organizational and analytical skills.

The responsibilities of the ADA/504 Coordinator include coordinating CRPD's efforts to comply with Title II and investigating any complaints related to potential violations of Title II. The role of the ADA Coordinator typically includes being the primary contact when members of the public request an auxiliary aid or service for effective communication, such as a sign language interpreter or documents in Braille. An effective ADA Coordinator will be able to efficiently assist people with disabilities with their questions. These roles and responsibilities are consistent with the Department of Justice's guidance for "An Effective ADA Coordinator" (<https://www.ada.gov/pcatoolkit/chap2toolkit.htm>).

3.1.3 ADA GRIEVANCE POLICY, PROCEDURE, AND FORM WITH APPEALS PROCESS FOR THE ADA

Local government agencies with 50 or more employees are required to adopt and publish procedures for resolving grievances in a prompt and fair manner that may arise under Title II of the ADA. The purpose of the ADA grievance procedure is to provide a mechanism for the resolution of discrimination issues at the Department level, rather than require the complainant to resort to resolution at the federal level.

The City of Columbus' ADA grievance procedure is located on the City's website here: <https://www.columbus.gov/Government/Departments/Human-Resources/ADA-Compliance/Grievance-Procedure>. A separate copy of the City's grievance procedure and form are provided in [Appendix B](#).

3.1.4 PUBLIC NOTICE UNDER THE ADA

The ADA public notice requirement applies to all state and local governments covered by Title II, including entities with fewer than 50 employees. The target audience for the public notice includes applicants, beneficiaries, and other people interested in the entity's programs, services, and activities. This notice is required to include information regarding Title II of the ADA and how it applies to the programs, services, and activities of the public entity.

The notice should also include the name and contact information of the ADA/504 Coordinator. State and local government entities should provide the information on an ongoing basis whenever necessary or requested by the public. DOJ suggestions for ways to provide notice are provided at: <https://www.ada.gov/pcatoolkit/chap2toolkit.htm>.

The City of Columbus' public notice under the ADA is available on City's website here: <https://www.columbus.gov/Government/Departments/Human-Resources/ADA-Compliance/ADA-Notice>. A separate copy of the City's public notice under the ADA is provided in [Appendix B](#). Publicizing the ADA notice is not a one-time requirement, and CRPD will provide the information on an ongoing basis, whenever necessary.



3.2 PROGRAMS, SERVICES, AND ACTIVITIES (PSA) REVIEW

As part of a future update to this Transition Plan, CRPD plans to compile a list of all Department programs, services, and activities required to be reviewed for compliance with Title II of the ADA. The ADA Audit and Transition Plan initiated a sustainable program with the purpose of identifying barriers and document current conditions. Once complete, the probable costs of time

and materials was documented to include this information in capital improvement projects to eliminate these physical barriers or to allow CRPD to conduct more inclusive programs and services.

CRPD intends to continue to refine this process by utilizing data analytics generated through eligibility requirements, participation rates, facilities used, staff training, tours, transportation, communication, notifications, public meetings, the use of contracted services, purchasing, maintenance of accessible features, and emergency procedures.

As the inventory and self-evaluation of these PSAs are completed, updates to CRPD’s Transition Plan will be made to include findings and possible solutions for identified barriers.



3.3 FACILITY EVALUATIONS

The Federal Highway Administration (FHWA) has provided guidance on the ADA Transition Plan process in their “INFORMATION: ADA Transition Plans” memo dated June 27, 2019 (see [Appendix B](#)). While this memo specifically addresses state departments of transportation, FHWA also recommends this guidance for local municipalities until municipality-specific guidance is developed by FHWA. Provided in the memo is a checklist for elements to be included in an ADA Transition Plan and other ADA requirements that agencies must fulfill.

Items included in the FHWA checklist related to the public rights-of-way and other public facilities are:

- Inventory of Barriers (identification of physical obstacles)
 - Identify intersection information, including curb ramps and other associated accessibility elements.
 - Require an Action Plan to develop an inventory of sidewalks (slopes, obstructions, protruding objects, changes in level, etc.), signals (including accessible pedestrian signals), bus stops (bus pads), buildings, parking, rest areas (tourist areas, picnic areas, visitor centers, etc.), mixed-use trails, linkages to transit.
 - Discuss jurisdictional issues/responsibilities for sidewalks.
- Schedule
 - Show a strong commitment toward upgrading ADA elements identified in the inventory of barriers in the short term (planned capital improvement projects).
 - Show a strong commitment over time toward prioritizing curb ramps at walkways serving entities covered by the ADA.
 - Schedule should include prioritization information, planning, and investments to eliminate other identified barriers over time.
 - Dedicate resources to eliminate identified ADA deficiencies.
- Implementation Methods
 - Describe the methods that will be used to make the facilities accessible and include the governing standard (e.g., 2010 ADA Standards, 2023 PROWAG).

- CRPD plans to continue to evaluate all Department-owned and/or maintained facilities for compliance with 2010 ADA Standards for Accessible Design and 2023 PROWAG in subsequent project phases to monitor the condition of their facilities.

3.3.1 BUILDINGS

In this phase, thirty-seven buildings, predominantly CRPD Community Centers, were evaluated. All buildings included in the evaluation are listed in **Table 1** and shown on the map in [Appendix D](#).



TABLE 1. SUMMARY OF BUILDINGS REVIEWED

Location Name	Property Address
1. Bill McDonald Athletic Complex	4990 Olentangy River Rd, Columbus, OH 43214
2. Antrim Shelterhouse	5800 Olentangy River Rd, Columbus, OH 43235
3. Barnett Recreation Center	1184 Barnett Rd, Columbus, OH 43227
4. Beatty Recreation Center	247 N Ohio Ave, Columbus, OH 43203
5. Far East Recreation Center	1826 Lattimer Dr, Columbus, OH 43227
6. Big Walnut Park Shelterhouse	5000 E Livingston Ave, Columbus, OH 43227
7. Blackburn Recreation Center	263 Carpenter St, Columbus, OH 43205
8. Brentnell Recreation Center	1280 Brentnell Ave, Columbus, OH 43219
9. Carriage Place Recreation Center	4900 Sawmill Rd, Columbus, OH 43235
10. Feddersen Recreation Center	3911 Dresden St, Columbus, OH 43224
11. Dodge Recreation Center	667 Sullivant Ave, Columbus, OH 43215
12. Dodge Pool	645 Sullivant Ave, Columbus, OH 43215
13. Driving Park Community Center	1100 Rhoads Ave, Columbus, OH 43206
14. Driving Park Pool	1100 Rhoads Ave, Columbus, OH 43206
15. Goodale Park Shelterhouse	120 W Goodale St, Columbus, OH 43215
16. Holton Recreation Center	303 N Eureka Ave, Columbus, OH 43204
17. William H. Adams Community Center	854 Alton Ave, Columbus, OH 43219
18. Lazelle Woods Community Center	8140 Sancus Blvd, Columbus, OH 43081
19. Barack Recreation Center	580 E Woodrow Ave, Columbus, OH 43207
20. Lincoln Pool	545 E Woodrow Ave, Columbus, OH 43207
21. Marion Franklin Community Center & Marion Franklin Pool	2801 Lockbourne Rd, Columbus, OH 43207
22. McKnight Outdoor Education Center – Ottawa Lodge	3200 Indian Village Rd, Columbus, OH 43221
23. McKnight Outdoor Education Center – Wyandot Lodge	3228 Indian Village Rd, Columbus, OH 43221
24. Milo Grogan Recreation Center	862 E 2nd Ave, Columbus, OH 43201
25. North Bank Park Pavilion	311 West Long St, Columbus, OH 43215
26. Schiller Recreation Center	1069 Jaeger St, Columbus, OH 43206
27. Sullivant Gardens Recreation Center	755 Renick St, Columbus, OH 43223
28. Thompson Recreation Center	1189 Dennison Ave, Columbus, OH 43201
29. Columbus Aquatics Center	1160 Hunter Ave, Columbus, OH 43201
30. Tuttle Recreation Center & Tuttle Pool	240 W Oakland Ave, Columbus, OH 43201
31. Westgate Community Center	455 S Westgate Ave, Columbus, OH 43204
32. Westgate Shelterhouse	3271 Wicklow Rd, Columbus, OH 43204
33. Whetstone Recreation Center	3923 N High St, Columbus, OH 43214

TABLE 1. SUMMARY OF BUILDINGS REVIEWED (CONTINUED)

Location Name	Property Address
34. Whetstone Shelterhouse	3271 Wicklow Rd, Columbus, OH 43204
35. Douglas Community Center	1250 Windsor Ave, Columbus, OH 43211
36. Windsor Pool	1300 Windsor Ave, Columbus, OH 43211
37. Woodward Recreation Center	5147 Karl Rd, Columbus, OH 43229

Buildings: Self-Evaluation Observations

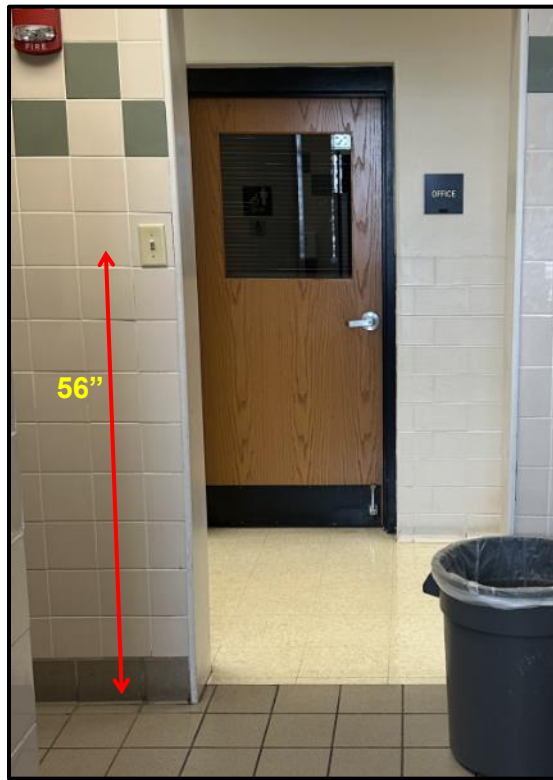
Areas that were evaluated for each building included but were not limited to parking lots, the path of travel from the parking lot to the building, access to the building, signage, drinking fountains, telephones, bathrooms, and counter heights. A complete list of issues is provided in the building facility reports (see [Appendix E](#)). Common issues identified included:

- Heights of counter space greater than 36 inches in height (see **Figure 1**)
- Operable parts greater than 48 inches above the floor level (see **Figure 2**)

FIGURE 1. COUNTER SPACE GREATER THAN 36 INCHES (BILL MCDONALD ATHLETIC COMPLEX)



**FIGURE 2. OPERABLE PARTS GREATER THAN 48 INCHES ABOVE THE FLOOR SURFACE
(BEATTY RECREATION CENTER)**



Buildings: Possible Solutions

A complete list of possible solutions is provided in the building facility reports (see [Appendix E](#)).

3.3.2 PARKS

In all, twenty-nine CRPD parkland properties were evaluated during this project phase. The evaluation included accessible parking spaces, park amenities, and the associated path of travel that provides access from the parking area to the amenities. In total, 226 accessible parking spaces, 187 curb ramps, 20 standard ramps, seven (7) pedestrian bridges, and approximately 30 miles of sidewalk (accessible route) were evaluated. All parks included in the evaluation are listed in **Table 2** and shown on the map in [Appendix D](#).

More information about accessible parking, on-site sidewalks, and park amenities at the evaluated parks is provided in the following sections. A complete list of issues is provided in the park facility reports (see [Appendix E](#)).

TABLE 2. SUMMARY OF PARKS REVIEWED

Location Name	Property Address
1. Anheuser-Busch Sports Park	4990 Olentangy River Rd, Columbus, OH 43214
2. Antrim Park	5800 Olentangy River Rd, Columbus, OH 43235
3. Barnett Park	1184 Barnett Rd, Columbus, OH 43227
4. Battelle Riverfront Park	25 Marconi Blvd, Columbus, OH 43215
5. Beatty Park	247 N Ohio Ave, Columbus, OH 43203
6. Big Walnut Park	1826 Lattimer Dr, Columbus, OH 43227
7. Blackburn Park	263 Carpenter St, Columbus, OH 43205
8. Brentnell Park	1280 Brentnell Ave, Columbus, OH 43219
9. Carriage Place Park	4900 Sawmill Rd, Columbus, OH 43235
10. Cooke Park	3911 Dresden St, Columbus, OH 43224
11. Dodge Park	667 Sullivant Ave, Columbus, OH 43215
12. Driving Park	1100 Rhoads Ave, Columbus, OH 43206
13. Goodale Park	120 W Goodale St, Columbus, OH 43215
14. Holton Park	303 N Eureka Ave, Columbus, OH 43204
15. Krumm Park	854 Alton Ave, Columbus, OH 43219
16. Lazelle Woods Park	8140 Sancus Blvd, Columbus, OH 43081
17. Lincoln Park	580 E Woodrow Ave, Columbus, OH 43207
18. Marion-Franklin Park	2801 Lockbourne Rd, Columbus, OH 43207
19. McKnight Outdoor Education Center	3200 Indian Village Rd, Columbus, OH 43221
20. Milo-Grogan Park & Community Center	862 E 2nd Ave, Columbus, OH 43201
21. North Bank Park	311 West Long St, Columbus, OH 43215
22. Schiller Park	1069 Jaeger St, Columbus, OH 43206
23. Sullivant Gardens Park	755 Renick St, Columbus, OH 43223
24. Thompson Park	1189 Dennison Ave, Columbus, OH 43201
25. Tuttle Park	240 W Oakland Ave, Columbus, OH 43201
26. Westgate Park	455 S Westgate Ave, Columbus, OH 43204
27. Whetstone Park	3923 N High St, Columbus, OH 43214
28. Windsor Park	1250 Windsor Ave, Columbus, OH 43211
29. Woodward Park	5147 Karl Rd, Columbus, OH 43229

3.3.2.1 PARK AMENITIES

Park Amenities: Observations

The amenities collection focused on evaluating the number of existing elements present at each park. The goal was to ascertain a target number of those elements that, once made accessible, would establish a reasonable level of access-based geographic equity. In accordance with other accessibility standards, proposing 20% of amenities of the same type be compliant within an individual park site was used as a best practice.

1,361 amenities were evaluated at the parks. The evaluations consisted of the following amenity types:

- Park Shelters
- Play Area's and associated surfacing, ramps, transfer systems, and play equipment
- Wheelchair accessible seating adjacent to bleachers and sporting locations
- Drinking fountains
- Gates
- Benches
- Grills
- Picnic Tables
- Waste Receptacles

Common issues identified included:

- Lack of clear floor space adjacent to the amenity
- Lack of accessible route to the amenity

Park Amenities: Possible Solutions

A complete listing of the amenities collected at the parks, as well as possible solutions, are provided in [Appendix E](#).

3.3.2.2 ACCESSIBLE PARKING

Accessible Parking: Observations

226 accessible parking spaces across 29 parks were evaluated. At these 29 parks, 58 lots were evaluated. The evaluations documented the conditions and measurements of the parking spaces, access aisles, and signage.

Of the 58 lots, 50 have enough accessible parking spaces to meet or exceed the minimum required number. Similarly, forty-one 41 locations have enough van-accessible spaces to meet or exceed the minimum requirement. A summary table of this information is provided in [Appendix E](#).

Some parking lots were observed not to have accessible parking spaces, and costs for improvements at these locations were not included in the improvement cost summary since there are many possible solutions to bring the lots into compliance. For example, existing spaces could require only striping changes where slopes are compliant and no barriers exist. Alternatively, existing spaces could be required to be repaved in order to achieve compliance. Additionally, depending on the location of the parking spaces that will be made accessible, additional improvements may be necessary such as the installation of a sidewalk to connect the parking to amenities.

Accessible parking spaces must be located on the shortest accessible route to the accessible entrance to a facility; however, there is no universal solution to address this issue. Each location has unique requirements that need to be evaluated independently by CRPD to determine the most effective solution. A list of these parking lots and their locations are provided in [Appendix E](#).

A summary of the status of existing accessible parking elements is provided in **Table 3**. Common issues within the accessible parking spaces included vertical discontinuities (see **Figure 3**), horizontal openings (see **Figure 4**), and excessive running slope. Note that where the minimum required number of accessible parking spaces or van-accessible spaces were not present in a lot, the parking space will need to be provided either by repaving or restriping existing spaces within the lot.

TABLE 3. SUMMARY OF ACCESSIBLE PARKING COMPLIANCE

Accessible Parking Element	Number Evaluated	Number Compliant	Percent Compliant
Parking Space width is \geq 96 inches	226	218	96.5%
Parking Space is served by an access aisle	226	210	92.9%
Parking space cross slope is \leq 2.0%	226	208	92.0%
Parking space running slope is \leq 2.0%	226	180	79.6%
Parking space does not have any horizontal openings $>$ 1/2 inch	226	147	65.0%
Parking space does not have any vertical discontinuity $>$ 1/4 inch	226	134	59.3%

FIGURE 3. VERTICAL DISCONTINUITY (WHETSTONE PARK, LOT 2, SPACE 3)



FIGURE 4. HORIZONTAL OPENINGS (ANHEUSER-BUSCH SPORTS PARK, LOT 1, SPACE 3)



Table 4 provides a summary of access aisle compliance. Common access aisle issues included aisles not marked to discourage parking (see **Figure 5**), vertical discontinuities in the aisle (see **Figure 6**), and horizontal openings in the aisle.

TABLE 4. SUMMARY OF ACCESS AISLE COMPLIANCE

Access Aisle Element	Number Evaluated	Number Compliant	Percent Compliant
Access aisle cross slope is $\leq 2.0\%$	179	169	94.4%
Access aisle width is ≥ 60 inches	179	143	79.9%
Access aisle running slope is $\leq 2.0\%$	179	138	77.1%
Constrained width where the access aisle adjoins the accessible route ≥ 36 inches	179	137	76.5%
Access aisle adjoins the accessible route	179	120	67.0%
Access aisle does not have any horizontal openings $> 1/2$ inch	179	117	65.4%
Access aisle does not have any vertical discontinuities $> 1/4$ inch	179	103	57.5%
Access aisle is marked to discourage parking	179	68	38.0%

[Remainder of page intentionally left blank]

**FIGURE 5. ACCESS AISLE NOT MARKED TO DISCOURAGE PARKING
(WOODWARD PARK, LOT 3)**



FIGURE 6. VERTICAL DISCONTINUITIES IN ACCESS AISLE (LAZELLE WOODS PARK, LOT 2)



Accessible Parking: Possible Solutions

Common solutions for improving the accessible parking at the parks include:

- Providing additional accessible and van-accessible parking spaces where deficient
- Repaving or relocating non-compliant accessible parking spaces and access aisles

A complete list of possible solutions can be found in the accessible parking reports provided in [Appendix E](#).

3.3.2.3 ACCESSIBLE ROUTE

Accessible Route: Observations

The accessible route evaluations documented conditions and measurements along the pedestrian path of travel from the accessible parking to the park amenities and building entrances. This includes the on-site sidewalk, curb ramps, pedestrian crossings at driveway openings, standard ramps, pedestrian bridges, and signalized pedestrian crossings. Approximately 30 miles of accessible route sidewalks were evaluated. Maps of the evaluated accessible route sidewalks are provided in the facility reports in [Appendix E](#).

Common issues along the sidewalk were excessive cross slopes, vertical surface discontinuities that caused excessive level changes, and temporary obstructions in the path of travel, such as weeds and low-hanging branches. Where excessive vegetation was present, field crews attempted to assess the condition of the underlying sidewalk. Where possible, the condition of the underlying sidewalk was recorded; however, CRPD may find additional issues with the sidewalk once the temporary obstruction is removed.

114 unsignalized pedestrian crossings were evaluated along the on-site sidewalk. Common curb ramp issues at the unsignalized pedestrian crossings included curbed sides less than 90 degrees, no detectable warning surface, and no flush transition to the roadway. A summary of the curb ramp issues is provided in **Table 5**.

TABLE 5. SUMMARY OF CURB RAMP ISSUES AT UNSIGNALIZED PEDESTRIAN CROSSINGS

Curb Ramp Element	Number Evaluated	Number Compliant	Percent Compliant
48" crosswalk extension exists	7	7	100%
Curb ramp width \geq 36"	168	166	99%
Curb ramp lands in crosswalk	168	163	97%
Curb ramp turning space (landing) exists	168	162	97%
Curb ramp present where curb ramp is needed	177	168	95%
Curb ramp counter slope \leq 5%	168	159	95%
Detectable warning surface is compliant	52	49	95%
Curb ramp cross slope \leq 2%	65	60	93%
No obstruction in curb ramp, turning space (landing), or flares	168	148	88%
No ponding in curb ramp, turning space (landing), or flares	168	140	83%
Curb ramp turning space (landing) cross slope \leq 2%	59	47	80%
Curb ramp turning space (landing) running slope \leq 2%	59	45	76%
Curb ramp running slope \leq 8.3%	65	48	74%
Flare cross slope \leq 10%	34	22	65%
Curb ramp does not have traversable sides	31	14	45%
Flush transition to roadway exists	168	70	42%
Detectable warning surface exists	168	52	31%
Curbed sides are 90°	31	4	13%

Three (3) signalized pedestrian crossings were evaluated along the on-site sidewalk. Signalized intersection evaluations cataloged the conditions and measurements along the pedestrian path of travel, which includes street crossings, curb ramps, sidewalks adjacent to the curb ramps, and pedestrian signal equipment and adjacent clear spaces.

Common curb ramp issues at signalized pedestrian crossings include a non-flush transition between the curb ramp and the roadway and permanent obstructions present in the curb ramp, turning space, or flares. **Table 6** summarizes the curb ramp issues at signalized intersections, and **Table 7** summarizes the push button issues.

TABLE 6. SUMMARY OF CURB RAMP ISSUES AT SIGNALIZED INTERSECTIONS

Curb Ramp Element	Number Evaluated	Number Compliant	Percent Compliant
Curb ramp lands in crosswalk	9	9	100%
Detectable warning surface exists	9	9	100%
Curb ramp turning space (landing) exists	9	9	100%
Blended transition running slope ≤ 5%	1	1	100%
Curb ramp present where curb ramp is needed	10	9	90%
Detectable warning surface is compliant	9	8	89%
Curb ramp turning space (landing) cross slope ≤ 2%	9	8	89%
Curb ramp turning space (landing) running slope ≤ 2%	9	8	89%
Curb ramp counter slope ≤ 5%	9	8	89%
Curb ramp width ≥ 48"	9	8	89%
Curb ramp cross slope ≤ 2%	8	6	75%
No ponding in curb ramp, turning space (landing), or flares	9	6	67%
Flare cross slope ≤ 10%	8	5	63%
Curb ramp running slope ≤ 8.3%	8	5	63%
No obstruction in curb ramp, turning space (landing), or flares	9	2	23%
Flush transition to roadway exists	9	2	23%

TABLE 7. SUMMARY OF PUSH BUTTON ISSUES

Push Button Element	Number Evaluated	Number Compliant	Percent Compliant
Push button height ≤ 48"	6	6	100%
Push button diameter 2"	6	6	100%
Push button reach range > 10"	6	6	100%
Pedestrian head present where needed	8	8	100%
Clear space is ≥ 30" x 48"	6	6	100%
Pedestrian push button sign exists	8	8	100%
Push button offset from curb ≤ 10'	6	6	100%
Push button offset from crosswalk ≤ 5'	6	5	84%
Push button present where needed	8	6	75%
Push button orientation parallel to the crossing	6	4	67%
Cross slope of the clear space ≤ 2%	6	4	67%
Pedestrian push button sign is MUTCD approved	8	0	0%

Accessible Route: Possible Solutions

Common solutions for improving the accessible route at the evaluated parks include:

- Ensure flush transitions from curb ramps to roadway exist
- Remove and replace non-compliant pavement and sidewalk
- Remove obstructions or widen the sidewalk to avoid obstructions in the accessible route
- Install detectable warning surfaces at curb ramps that lead pedestrians into the vehicular path of travel
- Trim vegetation such as weeds and low-hanging branches from the pedestrian circulation path.

The park facility reports provided in [Appendix E](#) provide a complete list of possible solutions for all park facilities.



3.4 MAINTENANCE VERSUS ALTERATIONS

The United States Department of Justice (DOJ) has issued a briefing memorandum on clarifying maintenance versus alteration projects regarding improvements completed in the public right-of-way. The information contained in the briefing memorandum is below. We recommend that the appropriate CRPD staff be distributed this clarification regarding when curb ramp installation is required as part of a project.



The Americans with Disabilities Act of 1990 (ADA) is a civil rights statute prohibiting discrimination against persons with disabilities in all aspects of life, including transportation, based on regulations promulgated by the United States Department of Justice (DOJ). DOJ's regulations require accessible planning, design, and construction to integrate people with disabilities into mainstream society. Further, these laws require that public entities responsible for operating and maintaining the public rights-of-way do not discriminate in their programs and activities against persons with disabilities. FHWA's ADA program implements the DOJ regulations through delegated authority to ensure that pedestrians with disabilities have the opportunity to use the transportation system's pedestrian facilities in an accessible and safe manner.

FHWA and DOJ met in March 2012 and March 2013 to clarify guidance on the ADA's requirements for constructing curb ramps on resurfacing projects. Projects deemed to be alterations must include curb ramps within the scope of the project.

*This clarification provides a single Federal policy that identifies specific asphalt and concrete-pavement repair treatments that are considered to be alterations – requiring installation of curb ramps within the scope of the project – and those that are considered to be maintenance, which do not require curb ramps at the time of the improvement. **Figure 5** provides a summary of the types of projects that fall within maintenance versus alterations.*

This approach clearly identifies the types of structural treatments that both DOJ and FHWA agree require curb ramps (when there is a pedestrian walkway with a prepared surface for pedestrian use and a curb, elevation, or other barrier between the street and the walkway) and furthers the goal of the ADA to provide increased accessibility to the public right-of-way for persons with disabilities. This single Federal policy will provide for increased consistency and improved enforcement.

FIGURE 7. MAINTENANCE VERSUS ALTERATION PROJECTS

 ADA Maintenance	 ADA Alterations
Crack Filling and Sealing	Open-graded Surface Course
Surface Sealing	Cape Seals
Chip Seals	Mill & Fill/Mill & Overlay
Slurry Seals	Hot In-Place Recycling
Fog Seals	Microsurfacing/Thin Lift Overlay
Scrub Sealing	Addition of New Layer of Asphalt
Joint Crack Seals	Asphalt and Concrete
Joint repairs	Rehabilitation and Reconstruction
Dowel Bar Retrofit	New Construction
Spot High-Friction Treatments	
Diamond Grinding	
Pavement Patching	

Source: DOJ Briefing Memorandum on Maintenance versus Alteration Projects



3.5 FHWA GUIDANCE ON CLOSING PEDESTRIAN CROSSINGS

An alteration that decreases or has the effect of decreasing the accessibility of a facility below the requirements for new construction at the time of the alteration is prohibited. For example, removing an existing curb ramp or sidewalk (without equivalent replacement) is prohibited. However, in regard to the public rights of way, the FHWA has indicated a crossing may be closed if an engineering study (performed by CRPD and not included in the scope of this Transition Plan) determines the crossing is unsafe for any user. The crossing should be closed in accordance with PROWAG:

- At an intersection corner where pedestrian crossing is prohibited, curb ramps or blended transitions shall not be provided, and the pedestrian circulation path shall be either (a) separated from the roadway with landscaping or other non-prepared surface or (b) separated from the roadway by a detectable vertical edge treatment with a bottom edge 15 inches maximum above the pedestrian circulation path (PROWAG Section R203.6.1.1).
- At a mid-block or roundabout crosswalk where pedestrian crossing is not intended, curb ramps or blended transitions shall not be provided, and the pedestrian circulation path shall be either (a) separated from the roadway with landscaping or other non-prepared surface or (b) separated from the roadway by a detectable vertical edge

treatment with a bottom edge 15 inches maximum above the pedestrian circulation path (PROWAG Section R203.6.1.2)

Agencies wishing to close certain intersection crossings should have a reasonable and consistent policy on when to do so written in their Transition Plan or as a standalone document. If safety concerns are established by an engineering study, a pedestrian crossing should not be accommodated for any user. CRPD will only consider closing an existing pedestrian crossing if it is determined to be unsafe by an engineering study.



3.6 PRIORITIZATION

The following sections outline the prioritization factors and results for buildings, accessible parking, park amenities, park sidewalks, and unsignalized and signalized intersections. Each facility type has a different set of parameters to establish the improvement prioritization. These prioritization factors were taken into consideration when developing the implementation plan for the proposed improvements.

3.6.1 PRIORITIZATION FACTORS FOR FACILITIES

Buildings were prioritized on a 3-point scale and were given a priority of either “High,” “Medium,” or “Low” based on the barriers impact they have on persons with various disabilities, which is defined in **Table 8**. This prioritization methodology was developed by the Consultant Team to aid CRPD in determining how the buildings should be prioritized for improvements based on the severity of non-compliance with ADA.

High priority barriers prohibit access for a person with a disability, make access extremely troublesome, or present safety hazards to all users. These barriers likely do not have acceptable alternative routes or treatments to overcome the barrier.

Medium priority barriers partially prohibit access or make access quite difficult for a person with a disability. For medium priority barriers, alternative routes or treatments to overcome the barrier may or may not exist. Medium priority barriers may also be barriers which are significant obstacles prohibiting access but for which alternative access is available or assistance is readily available to navigate around the barrier. The presence of the medium priority barrier possibly causes a minor hazard to a person with a disability who is attempting to use the facility.

Low priority barriers typically do not limit access to facilities or services for a person with a disability. For low priority barriers, alternative routes or treatments are typically available or assistance can be provided to overcome the barrier. It is not likely that the presence of a low priority barrier would cause a danger to a person with a disability who is attempting to use or access the facility.

Park amenities were prioritized on a 3-point scale and were given a priority of either “High,” “Medium,” or “Low” based on the type of amenity and the required ADA standards, which are defined in **Table 9**. Ensuring that a play area has compliant surfacing would be a higher priority than installing a clear space adjacent to a bench when there may already be several benches in the area that are ADA-compliant. This prioritization methodology was developed by the Consultant Team to aid CRPD in determining which amenities should be prioritized for improvements over other amenities.

Signalized and unsignalized intersections were prioritized on a 13-point scale. The 13-point scale, which is used to prioritize both signalized and unsignalized intersections, is defined in **Table 10**. This prioritization methodology was developed by the Consultant Team to aid CRPD in determining which signalized intersections should be prioritized for improvements over other signalized intersections based on the severity of non-compliance with ADA.

Sidewalk corridors were prioritized on a 3-point scale and were given a priority of either “High,” “Medium,” or “Low” based on the severity of non-compliance, which is defined in **Table 11**. Compliant segments of the sidewalk corridor were given a priority label of “Compliant.” Only existing sidewalk is required to be brought into compliance if issues exist. All amenities within parks should be connected to the accessible route. Therefore, a sidewalk has been recommended to be installed to connect to any isolated amenities. Additionally, the sidewalk is not required to be installed where it does not currently exist; however, short gaps in the sidewalk network have been documented, assigned a low priority, and included in the cost projections.

All elements listed have been assigned priority. Unassigned elements, including accessible parking, pedestrian bridges, and ramps, are assumed to be high priorities.

TABLE 8. PRIORITIZATION FACTORS FOR BUILDINGS

Priority	Criteria
1 (high)	<ul style="list-style-type: none"> ▶ Lack of barrier-free parking ▶ Lack of accessible route to the building’s door ▶ Stairs where ramps or level surface are needed ▶ Doors that are too narrow ▶ Lack of elevator in a multi-level building ▶ Severely non-compliant slopes for accessible routes or ramps ▶ Displacements in walks or high thresholds ▶ Missing handrails ▶ Some signage issues (particularly those related to life/safety)
2 (medium)	<ul style="list-style-type: none"> ▶ Minor non-compliant slopes ▶ Some signage issues ▶ Minor issues with doors (small dimensional non-compliance, opening force and closing speed) ▶ Non-compliant dimensional issues (vestibules, corridors, etc.) ▶ Stairwell/stair issues, particularly where an elevator is not available ▶ Accessible restrooms ▶ Accessible work and service counters ▶ Moderately non-compliant dimensional issues ▶ Some protruding objects
3 (low)	<ul style="list-style-type: none"> ▶ Many signage issues ▶ Minor issues with light switches, electrical outlets, etc. ▶ Minor non-compliant dimensional issue

TABLE 9. PRIORITIZATION FACTORS FOR PARK AMENITIES

Priority	Criteria
1 (high)	Compliance issues at play areas including: <ul style="list-style-type: none"> ▶ Surfacing ▶ Number and types of playground elements ▶ Ramps ▶ Transfer Systems
2 (medium)	Compliance issues at: <ul style="list-style-type: none"> ▶ Bleachers ▶ Drinking Fountains ▶ Gates ▶ Availability of wheelchair seating at sporting areas
3 (low)	Compliance issues at: <ul style="list-style-type: none"> ▶ Grills ▶ Benches ▶ Picnic Tables ▶ Waste Receptacles

[Remainder of page intentionally left blank]

TABLE 10. PRIORITIZATION FACTORS FOR SIGNALIZED AND UNSIGNALIZED INTERSECTIONS

Priority	Criteria
1 (high)	Complaint filed on curb ramp or intersection or known accident/injury at site
2 (high)	Existing curb ramp with any of the following conditions: <ul style="list-style-type: none"> ▶ Running slope > 12% ▶ Cross slope > 7% ▶ Obstruction to or in the curb ramp or landing ▶ Level change > ¼ inch at the bottom of the curb ramp ▶ No detectable warnings AND within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
3 (high)	<ul style="list-style-type: none"> ▶ No curb ramp where sidewalk or pedestrian path exists AND within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
4 (high)	No curb ramps, but striped crosswalk exists
5 (medium)	Existing curb ramp with any of the following conditions: <ul style="list-style-type: none"> ▶ Running slope > 12% ▶ Cross slope > 7% ▶ Obstruction to or in the curb ramp or landing ▶ Level change > ¼ inch at the bottom of the curb ramp ▶ No detectable warnings AND NOT within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
6 (medium)	<ul style="list-style-type: none"> ▶ No curb ramp where sidewalk or pedestrian path exists AND NOT within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
7 (medium)	Existing diagonal curb ramp (serving both crossing directions on the corner) is non-compliant and should be replaced with two curb ramps, one serving each crossing direction on the corner.
8 (medium)	Existing curb ramp with any of the following conditions: <ul style="list-style-type: none"> ▶ Cross slope > 5% ▶ Width < 36 inches ▶ Median/island crossings that are inaccessible
9 (low)	Existing curb ramp with either running slope between 8.3% and 11.9% or insufficient turning space
10 (low)	Existing diagonal curb ramp without a 48-inch extension into the crosswalk
11 (low)	Existing pedestrian push button is not accessible from the sidewalk and/or curb ramp
12 (low)	Existing curb ramp with returned curbs where pedestrian travel across the curb is not protected
13 (low)	All other intersections not prioritized above

TABLE 11. PRIORITIZATION FACTORS FOR SIDEWALK (ACCESSIBLE ROUTE)

Criteria	Priority		
	1 (high)	2 (medium)	3 (low)
Cross slope of sidewalk is greater than 2%	Value > 3.5%	3.5% ≥ Value > 2.0%	-
Width of sidewalk is less than 36 inches for site paths or 48 inches for sidewalk in the public rights-of-way	Value < 36.0" (or value < 48.0")	-	-
Obstruction present along sidewalk	Obstruction - Permanent	Obstruction - Temporary	-
Heaving, sinking, or cracking present on sidewalk	Heaving Sinking Cracking	-	-
Ponding on sidewalk	-	Ponding	-
Missing sidewalk	-	-	Missing Sidewalk
Signalized cross street cross slope is greater than 5%	Value > 9.0%	9.0% ≥ Value ≥ 7.0%	7.0% > Value > 5.0%
Unsignalized cross street cross slope is greater than 2%	Value > 6.0%	6.0% ≥ Value ≥ 4.0%	4.0% > Value > 2.0%
Cross street running slope is greater than 5%	Value > 7.0%	7.0% ≥ Value ≥ 6.0%	6.0% > Value > 5.0%
Driveway sidewalk width is less than 48 inches	Value ≤ 36.0"	36.0" < Value < 42.0"	42.0" < Value < 48.0"
Driveway (or sidewalk if applicable) cross slope is greater than 2%	Value > 6.0%	6.0% ≥ Value ≥ 4.0%	4.0% > Value > 2.0%
Driveway (or sidewalk if applicable) condition is poor or poor dangerous	Elevation change greater than 1/2 inch or gaps greater than 1 inch	Elevation change between 1/4 inch and 1/2 inch or gaps between 1/2 inch and 1 inch	-

Table 12, Table 13, Table 14, Table 15, and Table 16 provide summaries of the prioritization classifications for buildings, park amenities, signalized intersections, sidewalks, and unsignalized intersections, respectively.

TABLE 12. PRIORITIZATION SUMMARY FOR BUILDINGS

Priority	Number of Barriers
1 (high)	362
2 (medium)	540
3 (low)	4,342
Total	5,204

TABLE 13. PRIORITIZATION SUMMARY FOR PARK AMENITIES

Priority	Number of Barriers
1 (high)	42
2 (medium)	35
3 (low)	63
Total	140

TABLE 14. PRIORITIZATION SUMMARY FOR SIGNALIZED INTERSECTIONS

Priority	Number of Intersections
0 (compliant)	0
1 (high)	0
2 (high)	2
3 (high)	0
4 (high)	1
5 (medium)	0
6 (medium)	0
7 (medium)	0
8 (medium)	0
9 (low)	0
10 (low)	0
11 (low)	0
12 (low)	0
13 (low)	0
Total	3

TABLE 15. PRIORITIZATION SUMMARY FOR SIDEWALK (ACCESSIBLE ROUTE)

Facility Type	Length (miles) by Priority				
	Priority 1 (high)	Priority 2 (medium)	Priority 3 (low)	Compliant	Total
Sidewalks	9.80	4.06	0.44	15.25	29.55
Pedestrian Driveway Crossings	0.01	0.07	0.02	0.07	0.16
Pedestrian Street Crossings	0.00	0.00	0.01	0.19	0.21
Total	9.81	4.13	0.47	15.51	29.92

TABLE 16. PRIORITIZATION SUMMARY FOR UNSIGNALIZED INTERSECTIONS

Priority	Number of Intersections
Compliant	2
1 (high)	0
2 (high)	99
3 (high)	2
4 (high)	0
5 (medium)	0
6 (medium)	0
7 (medium)	0
8 (medium)	0
9 (low)	6
10 (low)	0
11 (low)	0
12 (low)	1
13 (low)	4
Total	114



3.7 FACILITIES EVALUATION SUMMARY

This document serves as the ADA Transition Plan for CRPD. In developing the Transition Plan, an evaluation was conducted on the following facilities:

- 29 parks containing the following elements:
 - 1,361 park amenities
 - 226 accessible parking spaces
 - 37 buildings
 - 30 miles of on-site sidewalk
 - 114 unsignalized pedestrian crossings and associated curb ramps
 - Three (3) signalized pedestrian crossings and associated curb ramps
 - 20 standard ramps
 - Seven (7) pedestrian bridges

The possible solutions were prioritized, and an implementation plan was developed to provide guidance for CRPD's improvement projects in the coming years. Public outreach was also conducted to aid in the development of the plan.

CRPD is taking the actions described in the next steps in [Section 4.4](#) and will continue to look for and remedy barriers to access to ensure that Columbus citizens who are disabled are given access to the City's PSAs.

To confirm follow-up on corrective actions required under the Transition Plan, CRPD will institute an ADA Action Log, documenting its efforts at compliance with the ADA. At a minimum, the Action Log will identify items that are not ADA-compliant. After the adoption of the Transition Plan by the governing body of CRPD, the ADA Action Log will be updated on an annual basis. The ADA Action Log should be available upon request. The ADA Action Log is provided in [Appendix F](#).

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4.0 FACILITY COSTS



4.1 FACILITIES COST PROJECTION OVERVIEW

To identify funding sources and develop a reasonable implementation schedule, cost projection summaries for only the facilities evaluated were developed for each facility type. To develop these summaries, recent bid tabulations from the Ohio Department of Transportation (ODOT) construction projects, along with Consultant Team experience with similar types of projects, were the basis for the unit prices used to calculate the improvement costs. A contingency percentage (20%) was added to the subtotal to account for increases in unit prices in the future, in addition to an engineering design percentage (15%). All costs are in 2024 dollars. **Table 17** provides a summary of the estimated costs to bring each facility into compliance by priority level.

TABLE 17. SUMMARY OF FACILITY COSTS

Facility Type	High Priority	Medium Priority	Low Priority	Total*
Buildings	\$359,900	\$681,350	\$889,100	\$1,930,400
Park Amenities	\$307,000	\$66,500	\$56,500	\$430,000
Accessible Parking	\$2,068,800	\$0	\$0	\$2,068,800
Signalized Intersections	\$109,100	\$0	\$0	\$109,100
Park Sidewalk	\$8,852,100	\$5,343,500	\$383,200	\$14,578,800
Unsignalized Intersections	\$792,000	\$0	\$65,700	\$857,700
Pedestrian Bridges	\$5,332,000	\$0	\$0	\$5,332,000
Standard Ramps	\$597,600	\$0	\$0	\$597,600
CRPD Totals	\$18,418,500	\$6,091,350	\$1,394,500	\$25,904,400

*Table values are rounded for simplification

It is important to note that the facility cost estimates in **Table 17** only include the costs to remediate accessibility compliance issues as determined by a visual inspection of the facilities. Additional budget considerations should be given to the following:

- Aesthetic upgrades, such as remodeling/upgrading of outdated facilities;
- Current market conditions that may affect pricing of construction materials and labor, such as COVID-19;
- Construction challenges not visible during an inspection, such as underground or in-wall utilities; and
- Other factors that may affect costs.

The costs shown for pedestrian bridges are for full removal and replacement of the existing bridge due to non-compliant conditions. It is possible there are other solutions to remediate the pedestrian bridge that may not require full reconstruction. However, this determination requires further structural analysis that is outside the scope of the ADA compliance evaluations.

It is recommended that a design professional assist CRPD in determining the best overall design solutions with respect to various factors, including but not limited to, existing conditions, available construction budget, and consideration for all elements that are out of compliance in a particular area of a facility.



4.2 IMPLEMENTATION SCHEDULE

On an ongoing basis, CRPD is committed to outlining the barrier removal costs and developing a proposed implementation schedule by facility type for all CRPD-owned facilities evaluated. Actual annual budgets will vary to accommodate project scopes. For example, all barriers at a single intersection are recommended to be removed within the same project scope. Because cost projections vary by intersection, the actual annual budget may vary to accommodate all improvements at an intersection. This annual plan will serve as the implementation schedule for the Transition Plan. CRPD reserves the right to change the barrier removal priorities on an ongoing basis to allow flexibility in accommodating community requests, petitions for reasonable modifications from persons with disabilities, and changes in CRPD programs.

In 2024 and 2025, the department committed funding to implement an additional round of assessments of the remaining public-facing facilities in CRPD's portfolio. They also initiated the first year of funds to address critical ADA modifications at the Franklin Park Adventure Center, which is home to the Therapeutic Recreation program. This funding includes purchasing a new facility where additional Therapeutic Recreation will be offered and designing the necessary renovations. Additionally, the department began incorporating improvements for evaluated facilities described in [Section 3.3](#) into the scope of work for other capital projects. It will be the role of the Design and Construction Strategic Administrators, the Capital and Strategic Planning Administrators, and the Safety Officer to determine the annual implementation plan. This plan will be based on the following criteria:

- Available funding, with a goal of at least \$200k designated for ADA projects, assuming the bond-funded capital budget remains stable or increases
- Priorities determined through the ADA Assessments
- Priorities that arise due to evolved programming needs
- Opportunities to address existing ADA issues by integrating them into projects at facilities and sites where capital investment is planned for other purposes.

CRPD's commitment to ADA modifications and assessments demonstrates a proactive approach to ensuring accessibility and inclusivity in its facilities. By continuously evaluating and addressing ADA needs, the department aims to create a more inclusive environment for all users, while also integrating these improvements into broader capital projects for maximum efficiency and impact



4.3 FUNDING OPPORTUNITIES

CRPD has several alternative funding sources available to complete the improvements in this Transition Plan. These opportunities include applying for resources at the federal and state levels, considering local options, and leveraging private resources. The following sections detail some different funding source options.

4.3.1 FEDERAL AND STATE FUNDING

There is federal and state funding available for CRPD to apply for through numerous agencies for various improvements. A summary of the available funding opportunities is available on the FHWA website:

https://www.fhwa.dot.gov/environment/bicycle_pedestrian/funding/funding_opportunities.cfm.

Most of these programs are competitive-type grants; therefore, CRPD is not guaranteed to receive these funds. The Department will need to track these programs to apply for the funds. Federal-aid funding programs have specific requirements that projects must meet, and eligibility must be determined on a case-by-case basis.

4.3.2 LOCAL FUNDING

There are several local funding options for CRPD to consider, including:

- Community Development Block Grants (CDBG)
- Community Improvement District (CID) – A geographically defined district in which commercial property owners vote to impose a self-tax. Funds are then collected by the taxing authority and given to a board of directors elected by the property owners.
- General fund (sales tax and bond issue)
- Scheduled/funded CIP projects that are funded through bonds



4.4 NEXT STEPS

CRPD will begin internal coordination to address the programmatic barriers identified in the Transition Plan.

CRPD will develop an annual budget each fiscal year. Projects identified in the ADA Transition Plan will be programmed within each budget based on the prioritization provided (see [Section 3.6 Prioritization](#)) and other factors determined by CRPD, such as how barrier removal can be incorporated into existing Department projects identified for capital improvements. Additionally, CRPD will develop a budget to continue facility evaluations for parks and buildings not described in [Section 3.3.1](#) and [Section 3.3.2](#). Finally, CRPD will budget for evaluations of programs, services, and activities as described in [Section 3.2](#).

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APPENDIX

APPENDIX A: PUBLIC OUTREACH

APPENDIX B: GRIEVANCE PROCEDURE AND PUBLIC NOTICE

CRPD TITLE II GRIEVANCE PROCEDURE

CRPD TITLE II GRIEVANCE FORM

PUBLIC NOTICE UNDER THE ADA

APPENDIX C: FEDERAL HIGHWAY ADMINISTRATION ADA TRANSITION PLANS PROCESS MEMO

APPENDIX D: EVALUATED FACILITY MAPS

BUILDINGS

PARKS

APPENDIX E: FACILITY REPORTS

BUILDINGS

PARKS

APPENDIX F: ADA ACTION LOG