

# Roger Williams National Memorial Accessibility Assessment

## Summary Report Findings and Recommendations

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National Park Service  
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**Roger Williams National Memorial  
Accessibility Assessment  
Summary Report of Findings and Recommendations  
Assessment Date: May 3, 2011**

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## **II. Final Identified Locations in FMSS**

68240 - Antram Gray House  
68245 - Hahn Memorial  
68246 - Grounds and Landscape  
82624 - Memorial Parking Lot  
82625 - Memorial Sidewalks  
230226 - Interpretive Wayside System Exterior  
230231 - Visitor Center Interpretive Exhibits

## **III. Park Purpose, History and Themes**

The Roger Williams National Memorial (ROWI) preserves the ideals of religious freedom and foundation of a new colony at Providence, Rhode Island. Seventeenth century colonist, Roger Williams was banished from the Massachusetts Bay Colony at Salem after being convicted of having dangerous opinions relating to the separation of religious beliefs from state regulations. Williams fled from Salem and sought solace with the American Indians prior to the establishment of the Rhode Island colony in 1636.

The National Park Service interprets the life of Roger Williams and his progressive ideas on freedoms that ultimately influenced the expressed resolutions in the Declaration of Independence. The only National Park Service unit in Rhode Island, the Roger Williams National Memorial receives visitation from local residents, college students, artists, and those individuals seeking to complete the circuit of historic sites contained in the John H. Chafee Blackstone River Valley National Heritage Corridor. The

grounds of the memorial encompass one full city block and include a large amount of green space and a Visitor Center.

## **IV. The National Center on Accessibility Assessment Approach**

The National Center on Accessibility assessment process is designed to identify barriers to participation for people with disabilities, make recommendations for barrier removal and improved access, and develop associated work orders and cost estimates to assist Park personnel in long-term planning. The NCA assessment team utilizes the federal standard for program access, Section 504 of the 1973 Rehabilitation Act, as a guiding principle for viewing the programs, activities and services of the National Park or Historic Site, in its entirety, for consideration of barrier removal. The assessment team looks critically at the programs that make up the visitor experience from the point of view of persons who have impairments to vision, hearing, mobility, or cognitive processes. This approach focuses the assessment process and outcomes on the visitor experience and beyond the realm of solely the physical environment. The NCA assessment team views the physical environment as a catalyst for program access and thus forms recommendations for barrier removal with program access at the forefront of the investigative and reporting processes.

At Roger Williams National Memorial, the assessment team from the National Center on Accessibility conducted an accessibility assessment of the physical and programmatic elements of the Visitor Center and the surrounding grounds. The team also interviewed key Park personnel, collecting information to provide a broad range of recommendations for improving access for visitors with disabilities.

## **V. Referenced Standards and Guidelines**

The National Park Service is legislatively mandated to provide accessible facilities and programs for their visitors with disabilities. Based on these mandates, the National Center on Accessibility utilizes the following accessibility standards and guidelines for their assessment:

### **Architectural Barriers Act of 1968 as amended (U.S. Access Board, 2004; General Services Administration, effective date May 8, 2006)**

This document contains scoping and technical requirements for accessibility to sites, facilities, buildings, and elements by individuals with disabilities. The requirements are to be applied during the design, construction, addition to, alteration, and lease of sites, facilities, buildings, and elements to the extent required by regulations issued by Federal agencies under the Architectural Barriers Act of 1968 (ABA).

### **Rehabilitation Act of 1973, as amended in 1978, Section 504**

Section 504 of the Rehabilitation Act (1973) reads, "No otherwise qualified individual with a disability in the United States shall solely by reason of his disability, be excluded from the participation in, be denied benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance, or under any program or activity conducted by an Executive Agency."

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

This section, amended in 2000, requires access to electronic and information technology provided by the Federal government. The law applies to all Federal agencies when they develop, procure, maintain, or use electronic and information technology. Federal agencies must ensure that this technology is accessible to employees and members of the public with disabilities to the extent it does not pose an "undue burden."

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

This NPS Director's Order reiterates the NPS goal to ensure that all people, including the estimated 54 million citizens with disabilities, have the highest level of accessibility that is reasonable to their programs, facilities and services in conformance with applicable regulations and standards. Five objectives are outlined including: incorporation of the highest level of accessibility as a long range goal; implementation through daily operation, policies, organizational relationships and strategies; provision of guidance and direction regarding the NPS interpretation of laws and policies; establishment of a framework for effective implementation; and ensuring the implementation of "universal design" principles within the National Park system.

### **Programmatic Accessibility Guidelines for National Park Service Interpretive Media (February 2012)**

These NPS Guidelines combine laws, policies, and best practices for interpretive media. The guidelines acknowledge that no interpretive media product works alone. Media products are interdependent and each has inherent strengths and weaknesses. Park visitors sample and benefit from an array of interpretive media. These guidelines describe design and presentation solutions that are acceptable in most interpretive media situations. It should be noted however that these guidelines present highlights only and are not comprehensive.

### **Draft Final Accessibility Guidelines for Outdoor Developed Areas (U.S. Access Board, October 19, 2009)**

Achieving accessibility in outdoor environments has long been a source of inquiry due to challenges and constraints posed by terrain, the degree of development, construction practices and materials, and other factors. These guidelines are proposed by the U.S. Access Board as new scoping and technical requirements for outdoor developed areas covered by the Architectural Barriers Act. The guidelines will cover new and altered trails, beaches, picnic and camping facilities and viewing areas. While these guidelines are not yet enforceable as requirements for Federal entities, they should be integrated into the planning, construction, and renovation of outdoor recreation areas and facilities and in the provision of programs and services provided to the public as best practice guidelines.

In addition to legislative mandates and proposed rulemaking, the NCA assessment team has made recommendations based on best practices in the field in order to create greater opportunities for participation and benefit among visitors with disabilities.

### **Principles of Universal Design**

Universal Design is the design of products and environments to be usable by all people, to the greatest extent possible, without the need for adaptation or specialized design. The intent of Universal Design is to simplify life for everyone by making products, communications, and the built environment more usable by as many people as possible at little or no extra cost. Universal Design benefits people of all ages and abilities.

There are times when NCA may use the concept of Universal Design for recommendations that are not requirements but are seen as “best practices”. An example would be providing recommendations for benches in the outdoor environment, installing power assisted exterior doors, marking parking spaces uniformly at 11 feet wide, and/or utilizing the advisories in ABAAS when appropriate due to accessibility issues that contribute to safety risks.

### **Smithsonian Guidelines for Accessible Exhibition Design**

The Smithsonian Guidelines is one of the very first and most formidable resources addressing exhibit design considerations for museum patrons with disabilities. The Smithsonian Guidelines are referenced as best practice for designing to various learning styles and functional abilities in the interpretive environment and especially in situations where the accessibility standards do not fully transfer to unique exhibition designs.

### **NPS Audio-Visual Accessibility Initiative for Visitors with Disabilities D24 (2420) (October 20, 2006)**

A series of official disability rights complaints and testimony received at a Congressional oversight hearing on disability access revealed that the NPS has many audiovisual programs that are not captioned or audio-described; assembly areas that are not equipped with assistive listening systems; and in some cases, captioning systems that are broken and have not been repaired. This initiative established the fundamental goal that the films and audio-visual programs presented in parks provide three basic services: open captions, audio-description, and assistive listening devices for those with hearing loss.

### **Architectural and Transportation Barriers Compliance Board Revised Draft Guidelines for Accessible Public Rights-of-Way (November 23, 2005)**

Sidewalks, street crossings, and other elements of the public rights-of-ways present unique challenges to accessibility for which specific guidance is considered essential. These proposed guidelines for public rights-of-way address various issues, including access for blind pedestrians at street crossings, wheelchair access to on-street parking, and various constraints posed by space limitations, roadway design practices, slope, and terrain. The new guidelines will cover pedestrian access to sidewalks and streets, including crosswalks, curb ramps, street furnishings, pedestrian signals, parking, and other components of public rights-of-way.

## **VI. Key Findings and Recommendations**

This section provides an overview of the NCA assessment team’s key findings and recommendations. More complete details of findings, recommendations for corrective actions and cost estimates are

available through the Facility Management Software System (FMSS) database, and the Cost Estimating Software System (CESS).

The deficiencies are given a priority rating by the assessors. The three accessibility deficiency priorities, as established by the National Park Service within FMSS, are:

**Critical** - A critical priority would be given to those deficiencies that occur in an asset or facility that is utilized by a significantly high number of people (visitors or employees); or "prohibits" or seriously inhibits people with disabilities from utilizing the facility.

**Serious** - A serious priority would be given to those deficiencies that occur in an asset or facility but only modestly inhibit an individual with a disability from utilizing the facility.

**Minor** - A minor priority would be given to those deficiencies that occur in any asset or facility but only slightly inhibit an individual with a disability from utilizing the facility. Minor classifications can also signify that the deficiency can be easily corrected with maintenance and/or minor adjustments or that correction might take more time and money but only needs to be corrected when renovations/replacements are scheduled.

## ***1. Policy Considerations and Best Practices***

During the review of assessment data, NCA accessibility specialists identified several barriers to accessibility, unique to Roger Williams National Memorial, that are not explicitly addressed in the above referenced standards. As a result of discussion with Park management, and in collaboration with recommendations from the U.S. Access Board, the Park has decided to adopt the following best practices to maximize accessibility for visitors with disabilities.

### Exterior Doors

While there is no identified accessibility standard for the operating force of exterior doors, it is recommended as best practice for the Park to adjust exterior door closers to reduce the operating force to as close to 5 pounds (maximum force requirement for interior doors) as possible. If this is not possible, the Park should investigate the installation of a power assisted or automatic door opener to minimize the potential barrier for an individual with a disability.

### Waysides and Interpretive Panels

As new waysides and interpretive panels are installed, or maintenance is conducted to existing routes where waysides and interpretive panels are furnished, clear ground space complying with ABAAS 305 should be provided, positioned for either a forward or parallel approach, centered on the frame.

### Benches

All new accessible benches should be installed with clear floor or ground space positioned near the bench for wheelchair seating that does not overlap the corresponding path of travel. As benches are

repaired or replaced, accessible benches should be provided until a minimum of 20 percent are accessible in each location. Accessible benches should have back support, at least one armrest, a seat height of between 17 inches minimum and 19 inches maximum, and should be installed along an accessible path of travel (i.e. accessible route, outdoor recreation access route, or trail).

## **2. Visitor Information / Trip Planning**

The Park website is often the first point of contact for people planning their visit to the Park. Currently, there is no information provided on the website regarding the physical or programmatic accessibility of the Park.

The recommendation is to create an accessibility section of the Park website to include comprehensive information about the Park's accessible features and services for visitors with disabilities. Include accessibility information, not only for people with physical disabilities, but also for people with sensory and cognitive disabilities. Provide specific information about auxiliary aids and services, brochures available in alternate formats, and objective statements about the conditions affecting the accessibility of the grounds to enable prospective visitors to plan accordingly. Include the procedure to request a sign language interpreter or to make other accommodation requests. It is also recommended that the Park reference the latest regulations published by the Department of Justice regarding service animals, and review and update the Park's policies on the issue. Finally, include the name and contact information of the staff member who serves as the Accessibility Coordinator for the Park.

## **3. Visitor Orientation and Way-finding**

There is no tactile representation of the facilities and features at the Roger Williams National Memorial. Absence of a tactile map depicting the Park features and landscapes within the Providence, RI cityscape does not permit equal access to information for individuals with visual impairments. The Park shall consult with design services to create a three-dimensional, tactile map of the Park. The map material should be able to withstand high visitor use, be comfortable to the touch (i.e., be able to withstand temperature extremes if located outside), and be finished with a coating that allows for routine cleaning. A variety of textures should be used to distinguish between landscape features, walkways, and built structures. The tactile map should include components such as raised lines and scale orientation options. The map should also include an audio description component.

## **4. Publications**

Publications offer a wide range of information; therefore, it is critical that people with disabilities receive the same information - of the same quality - as other visitors. Publications that are considered "readily available," like the official Park brochure and site bulletins, must be provided in all alternate formats.

None of the primary Park publications are available in alternate formats. Alternate formats include Contracted (Grade 2) Braille for visitors with visual impairments who cannot read large print, large print for visitors with low vision, and audio for visitors who are blind. Convert the primary Park (unigrid) brochure to large print, Braille, audio and electronic format. Large print and Braille publications shall be



readily available upon visitor request. Provide the audio and electronic version of the publications on the accessibility section on the Park website. Develop a procedure for converting content of secondary brochures to alternate formats and insert a statement in those publications indicating “alternate formats of this publication are available upon request.”

Add a section to the primary Park brochures explaining the availability of services for visitors with disabilities including information to request a sign language interpreter, availability of an assistive listening system, alternate formats, trail information, accessibility improvements to the Park, and the contact information for the Park’s accessibility coordinator. Ensure that the same information is added to the Park’s website.

## **5. Exhibits**

### Visitor Center Exhibits

The interpretive panels in the Visitor Center present a barrier for individuals with low vision due to insufficient font size, type and contrast, text over images, and excessive utilization of italics (i.e. quotations). The volume of text and images and complexity of interpretive content on the panels creates a barrier for persons who have learning disabilities or who are cognitively impaired.

The interpretive program content should be designed to communicate as effectively to people with disabilities as it does to people without disabilities. Generally, this requires purposeful design in the planning phase to accommodate what may be a wide range of sensory and cognitive impairments. At a minimum, interpretive panels should be replaced to include high-contrast, no glare, sans serif or simple serif font and larger font size appropriate for viewing distance and height. As panels are replaced, the interpretive content should be altered to present the main interpretive themes on a variety of levels of complexity, so they can be understood by people with varying abilities and interests. Where possible, consider presenting the most important information as a multi-sensory experience (i.e. tactile exhibits, audio description, easy to understand graphics, etc.). An audio described program of the interpretive content should be developed.

In the Visitor Center, the small Plexiglas case containing the compass exhibit protrudes from the exhibit panel into the path of travel. This creates a safety hazard for individuals who are blind or have low vision because the case is not cane-detectable. Objects that protrude more than 4 inches into the path of travel must have a leading edge at 27 inches maximum above the floor in order to be cane detectable. Refabricate or replace the existing Plexiglas case to ensure that the interpretive element does not protrude more than 4 inches into the path of travel or is cane detectable at 27 inches above the floor.

### Exterior Interpretive Elements

There are four waysides provided on the Memorial grounds: *A Century to Statehood*, *A Changing Nation*, *A Howling Wilderness*, and *A Shelter for Persons Distressed*. There are multiple deficiencies to the presentation of interpretive information. Serif font, insufficient contrast, and lack of audio or tactile

elements all create barriers to effective communication for persons with low vision, or individuals who are blind or have cognitive impairments.

Park management shall work with design services to create a comprehensive wayside and interpretive panel design and replacement plan. When panels are replaced, ensure that the information is presented in a way that is accessible to the widest range of visitors. Things to consider in interpretive design include the use of sans serif or simple serif fonts (as opposed to serif fonts), minimal use of italics, contrast between text and background of 70-95 percent, and the incorporation of audio and tactile elements. Where possible, all maps should be tactile. Text should not appear over images or in shadow as the stylistic presentation of information can interfere with readability.

## **6. Audio/Visual Programs**

All new media productions shall be open captioned and audio described per Section 508 of the Rehabilitation Act and the NPS Audio-Visual Accessibility Initiative. All existing media shall be captioned, audio described and available for use with an assistive listening system. The accessible features of the audio/visual programs such as assistive listening, audio description and open captioning shall be maintained through periodic testing and staff training. Display signage at visitor information areas indicating that the assistive listening system and audio description are available and market their availability through brochures, program announcements and the Park website.

### Assistive Listening System

An inductive loop assistive listening system is available for the video program shown in the Visitor Center. The technology was operational during the time of assessment; however, staff lacked knowledge on the location, application, and use of the devices. The Park shall provide training to staff and volunteers on the location, use and maintenance of the assistive listening system.

### Audio Description

The primary Park video is not audio described for individuals who are blind or have low vision. The Park shall work with an audio description consultant to produce, record, and integrate an audio described script for the five-minute video program.

### Open Captioning

During the time of assessment, visitors were required to request captioning to be turned on for the video shown in the Visitor Center. The video should be set to provide open captions on screen at all times. This task should be integrated into the standard operating procedure for all Park staff.

## **7. Talks and Tours**

### Portable Assistive Listening System

An inductive loop assistive listening system is available for the video program shown in the Visitor Center; however, a portable assistive listening system is not available for talks, tours, and special events. Therefore visitors with hearing loss cannot equal benefit from these programs. The Park shall provide a portable assistive listening system for talks and tours. Scoping for assistive listening systems is based on

the capacity of seating in assembly areas. The Visitor Center seating capacity is approximately ten persons. Two portable receivers (both shall be hearing-aid compatible) and one portable transmitter shall be purchased and dedicated for use for talks, tours and special events. Signage shall be provided alerting visitors to the availability of the accommodation.

#### Audio Description

There are many visual elements to the Visitor Center facility, exhibits, and grounds that are not audio described. This presents a barrier to full participation for visitors who are blind or have low vision. The Park shall work with a consultant to develop and record a script that will incorporate the visual elements of the Visitor Center and the exterior elements of the grounds, into an audio described tour. Be sure to include the following elements in development of the script: a general orientation to the grounds and Visitor Center, the exterior waysides, photos and text on interpretive panels, any exhibits behind Plexiglas, and the Hahn Memorial. In addition to providing a programmatic alternative solution for individuals who are blind or have low vision, audio description may also provide an enhanced program opportunity for individuals with cognitive impairments. Where audio description for exhibits is provided, incorporate signage alerting to the availability of audio description. In addition, the consultant should assist in determining what equipment would be most appropriate for the site's specific audio description needs.

### **8. Physical Building Elements**

Below is a summary of the major physical accessibility deficiencies, by area, found at the Roger Williams National Memorial. The identified barriers and recommended solutions have been entered into FMSS, and work orders have been generated and cost estimated for the removal of the specific barrier. For a detailed explanation of a specific deficiency and solution, please refer to the FMSS data and generated work orders.

#### Parking

There are two accessible parking spaces provided in the parking lot. One space is designed for van accessibility. Both spaces meet size and slope requirements; however, the parking signage does not meet minimum height requirements above the ground surface measured to the bottom of the sign. There is no signage including the designation "van accessible". The recommended solution is to replace the existing vertical sign posts with a product that will permit the signage to be installed 60 inches minimum above the ground surface measured to the base of the lowest sign. The Park shall purchase and install a sign containing the designation "van accessible" at the van accessible parking space.

There are three curb ramps providing access from the parking lot to the red brick sidewalks of the Roger Williams National Memorial. Two curb ramps are provided within the sidewalk between the accessible parking area and picnic area, and one is provided adjacent to the designated van accessible parking space. The running slope of each curb ramp exceeds maximum requirements up to 10.5 percent. The recommended solution is to remove the existing brick paver surface at each curb ramp and alter each area to provide an accessible route from the parking area onto the Memorial sidewalks. The new curb ramps shall comply with requirements for running slope, cross slope, clear width, and landings.

The parking lot has standard parking spaces for buses; however, there is no accessible passenger loading zone provided in the parking area for travelers with disabilities. It is recommended that Park management consult with design services to provide an accessible passenger loading zone for bus boarding and alighting. The accessible loading zone shall be appropriately sized to accommodate the deployment of a ramp or lift. The loading zone shall directly connect to the accessible route from the parking area to the Visitor Center.

#### Accessible Routes

The Memorial sidewalks at the Roger Williams National Memorial serve a variety of purposes for Park visitors. A number of outdoor recreation opportunities are available to the public including, but not limited to, walking, hiking, running, picnicking, outdoor amphitheater programs, interpretive walks, talks, and tours, and dog-walking. The most centrally located, and commonly occurring of these activities is picnicking. Because the Memorial sidewalks offer several recreational experiences, they do not strictly meet the US Access Board's definitions of a trail, outdoor recreation access route, or accessible route; however, the requirements and guidelines for each of these pathway types can be applied, in part, to the multi-use sidewalk system. It is for these reasons that portions of the sidewalk system are recommended to comply with the guidelines for outdoor recreation access routes (i.e. sidewalk sections connecting city walkways to the picnic area), while other sidewalk sections are recommended to comply with the requirements for an accessible route (i.e. connection of the parking area with the entrance to the Visitor Center). The primary determining factor of applying the various guidelines and standards to the Memorial sidewalks is the usability and primary function of each sidewalk section. Further detail regarding the Memorial sidewalks, including identified barriers and recommended solutions, can be found in the Facility Management Software System.

The accessible route from the visitor parking area, along Walks G and H (Cultural Landscape Report), to the ramp/stairway next to the Visitor Center has multiple deficiencies: the running slope along Walk G exceeds maximum requirements for an accessible route; cross slope at the intersection between Walks G and H exceeds maximum requirements for an accessible route; running slope along Walk H exceeds maximum requirements for an accessible route. The clear ground space in front of the wayside, *A Century to Statehood*, has slope that exceeds maximum recommendations for accessibility. Along both route sections, there are openings in the red brick paver surfacing that exceed maximum requirements which could cause a potential tripping and safety hazard for individuals with impairments to mobility. The recommended solution is to remove the brick paver surfacing along Walks G and H, grade the sub base, and reinstall brickwork to comply with slope requirements for accessible routes. Openings within the brick paver surface shall be eliminated during the renovation. Where interpretive features (i.e. waysides) are provided along accessible routes, clear ground space measuring 30x48 inches should be positioned at the front of the feature for either a forward or parallel approach, centered on the interpretive information. The slope of the clear ground space should not exceed 2.08 percent maximum in any direction. The wayside, *A Century to Statehood*, may require relocation in order to comply with this recommendation for accessibility.

The switchback ramp to the Visitor Center has multiple deficiencies. The top section of the ramp, beginning at the middle landing and ending at street level, has running and cross slope that exceeds maximum requirements for accessibility. Required handrails are not installed along any section of the ramp run. The Park shall consult with design services to provide an accessible ramp to the Visitor Center. Accessible ramps shall comply with requirements for running and cross slope. Where the running slope of the ramp is between 5 and 8.33 percent, handrails complying with ABAAS 505 are required to be installed on both sides of the ramp run. Level landings shall be provided at the top and bottom of the ramp, in addition to any location where the ramp changes direction.

The stairway directly adjacent to the Visitor Center incorporates a single aluminum handrail installed in the center of the stair flight. The existing handrail provides the required extensions at the top and bottom of the stair flight; however, the top extension is not parallel to the landing surface. Similarly, the stairway along Memorial Sidewalk Walk F (Cultural Landscape Report) leading to the picnic facility incorporates a single aluminum handrail installed in the center of the stair flight. The existing handrail does not provide the required extension at the bottom of the stair flight. The recommended corrective action is to remove the existing center handrail in both locations and install aluminum handrails (including extensions) on both sides of the stair flights. Handrails shall be provided on both sides of the stair flights and shall be continuous within the full length of each stair flight. The new handrails shall meet minimum requirements for diameter of the gripping surface. Ensure that the new handrails are installed to have a consistent top gripping surface between 34 inches minimum and 38 inches maximum above the stair nosings. At the top of a stair flight, handrails shall extend horizontally above the landing for 12 inches minimum beginning directly above the first riser nosing. At the bottom of a stair flight, handrails shall extend at the slope of the stair flight for a horizontal distance at least equal to one tread depth beyond the last riser nosing. Extensions shall return to a wall, guard, or the landing surface.

#### Visitor Center Entrance/Means of Egress

There are two single-doorway entrances to the Visitor Center. Each entrance incorporates a step up from street level, a high threshold at the doorway, and doorknob hardware that does not comply with requirements for operable parts. A portable ramp is deployed upon request for visitors using mobility assist devices, such as wheelchairs, who cannot independently overcome the step and threshold at the doorways. The temporary, removable ramps exceed maximum accessibility standards for running slope, and they do not include the required landings. Since neither of the existing entrances meets requirements for an accessible route, the corresponding requirement for an accessible means of egress from the building is not met.

The recommended solution is for the Park to consult with design services to create a permanent, accessible means of entry/egress into and out of the Visitor Center. Park management should consider the option of raising the elevation of the sidewalk to meet the height of at least one entry point. The accessible route serving the entrance to the Visitor Center shall comply with requirements for running slope, cross slope, changes in level, and landings on both sides of the accessible entrance(s). The knob hardware on both doors shall be replaced with locksets that do not require tight grasping, pinching, or

twisting of the wrist to operate (i.e. lever handles). If only one of the entrances is to be made accessible, compliant signage shall be installed designating the accessible means of entry/exit from the building. If both entrances are made accessible, signage is not required.

#### Picnic Facilities

According to the Draft Final – Outdoor Guidelines, a picnic facility is defined as, “a site, or portion of a site, developed for outdoor recreational purposes that contains picnic units.” A picnic unit is, “an outdoor space in a picnic facility used for picnicking that contains outdoor constructed features.” In this document they will be referred to as picnic facilities and picnic units, based on the language used in the Draft Final-Outdoor Guidelines.

There are a total of 12 picnic units provided on the grounds of the Roger Williams National Memorial. Nine of the non-fixed picnic tables are wood. Three of the tables are recycled plastic lumber and are designed for accessibility; however, the tables are not installed on an accessible surface. The grass surface of the picnic facility does not meet recommendations for firmness and stability. The brick paver surface of the adjacent patio and walkway area does not consistently meet recommendations for slope.

Accessible picnic units should be dispersed on the grounds to provide an equivalent picnicking experience as is available to visitors without disabilities (i.e. sun v. shade; grass v. brick paver surfacing). One accessible picnic unit should be provided on the existing brick paver surfacing of the patio, and two accessible units should be provided within the grassy area – one in sun, one in shade. Firm and stable surfacing (i.e. brick pavers) should be provided to, beneath, and around the two accessible units within the grassy area. Picnic tables should have a level clear ground space along all usable sides of the table measured from the back edge of the benches. The clear ground space for the accessible units should not overlap the Memorial sidewalks. The route to each accessible picnic unit (3) should connect to the Memorial sidewalks. Park management should consider fixing the picnic tables to the surface of the picnic facility in order to maintain features of accessibility.

#### Restrooms

One men’s and one women’s single-user restrooms are provided in the Visitor Center. Neither restroom meets minimum requirements for accessibility due to the orientation of fixtures and location of a load-bearing wall (bulkhead) within the space.

Due to the placement of a load-bearing wall in the existing men’s restroom in relation to the floor-mounted water closet, the restroom cannot be modified for accessibility. Therefore, the Park shall conduct a design study to provide two unisex single-user restrooms with the existing women’s restroom redesigned for accessibility. In order for the women’s restroom to meet accessibility requirements the following corrective actions shall be taken: replace the restroom signage; widen the toilet compartment to provide the required turning space within the restroom; replace the wall-mounted lavatory to comply with knee clearance and height requirements above the finish floor; insulate pipes beneath the lavatory to protect against contact; relocate the toilet paper dispenser to ensure a centerline of 7-9 inches in front of the leading edge of the water closet; replace the rear and side grab bars to comply with length

and location requirements identified in ABAAS; install a coat hook within reach range requirements; adjust the door pressure to 5 pounds maximum; and relocate the baby changing table to ensure clear ground space is provided for a forward approach, centered on the unit. Replace the non-fixed trash receptacle in the accessible toilet room with a different unit to ensure that the required clearances are provided at each element within the space.

If the existing women's restroom toilet compartment cannot be widened due to load bearing restrictions, consideration should be given to reorienting the floor mounted water closet so that the back of the fixture is facing the shared wall between the two restrooms. All affected fixtures including grab bars, toilet paper dispenser, and others will require relocation to comply with requirements for accessibility in relation to the orientation of the water closet.

#### Drinking Fountains

The existing single unit drinking fountain in the Visitor Center does not meet accessibility requirements for either a low or high unit. The knee clearance at the unit does not meet minimum height requirements for wheelchair use. The spout outlet, at 36 inches above the finish floor, is at the maximum height for a low unit but does not meet height requirements for standing persons. Therefore, the existing unit cannot be modified for full accessibility. Additionally, the water flow does not meet minimum height requirements for an accessible drinking fountain.

The recommended solution is to replace the existing single unit drinking fountain with a combination high-low unit that meets requirements for accessibility. Ensure that the new low unit complies with knee and toe clearances and clear floor space. Both units shall meet the applicable requirements for spout height and water flow. Controls on the new unit shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist. The new combination unit shall not impede the required 18 inches of clear space to the latch side of the proposed accessible (currently the women's) restroom door. In addition, the unit shall not diminish the clear width of the accessible route to the restroom to less than 36 inches minimum. If these requirements cannot be met due to space limitations, it is recommended that the Park eliminate the drinking fountain in the Visitor Center and provide a water cooler in its place that is usable by the public and complies with requirements for reach range and operable parts.

#### Benches & Trash Receptacles

There are a total of 14 wood benches with concrete framing provided on the grounds. None of the benches incorporate at least one armrest. Consistent with best practices for accessibility, the Park has decided that at least 20 percent of benches they provide within each unique area throughout the Park will have accessible features. A minimum of three benches should be replaced along the sidewalk system on the memorial grounds. Accessible benches provide back support and at least one armrest. Ensure that when installing the new benches that the seat height is consistent with requirements for accessibility. Ensure that clear ground space is positioned near the bench, but not overlapping the path of travel, for companion seating.

There are a total of eight trash receptacles and three dog waste stations provided along the sidewalk system of the memorial grounds. Each trash receptacle incorporates a detached lid that requires tight grasping to open/close which could present a barrier to individuals with limited dexterity. Consistent with the principles of Universal Design, the Park should replace all trash receptacles with units that meet best practice recommendations for accessibility. Accessible trash receptacles should not incorporate any operable parts that require tight grasping, pinching, or twisting of the wrist, and no more than five pounds of force maximum should be required to open/close the trash receptacle. Ensure that each receptacle is installed adjacent to the brick paver sidewalk within accessible reach range as identified in ABAAS 308. Ensure that clear ground space is positioned at the trash receptacles for either a forward or parallel approach. The Park should relocate the dog waste stations that are not currently installed on an accessible route (clear ground space with slope exceeding 2.08 percent) to a location along the sidewalk systems with an adjacent accessible trash receptacle.

## **9. Concessions**

Eastern National is the Park's operating concessionaire association. Concessions for the Park are provided in the Visitor Center. A portion of the concessions displayed did not comply with requirements for reach range; however, all merchandise was viewable and on display for all visitors.

Provision of accessible goods, activities and services by the concessionaire should be reviewed as part of the annual NPS evaluation. At a minimum, the concessionaire should strive to achieve the same level of program access as is expected of the programs or services offered by the National Park Service. As such, taking action on the recommendations to improve program access as outlined in this report would also be prescribed for the concessionaire. For example, when new inventory is selected, buyers are encouraged to seek video/DVD programs with captions and audio description and make those titles known to customers. If videos or DVDs are shown in retail spaces, versions with open-captions and audio descriptions are recommended for viewing.

## **VII. Action Planning**

Upon receipt of the assessment data, it will be critical for Park personnel to review and embark on a series of actions to continue planning for improved access to the programs and facilities at the Roger Williams National Memorial.

Park senior management is encouraged to establish a core accessibility management team with representation from various divisions including interpretation, maintenance, administration, concessions and senior management. Representation should include individuals with decision-making authority in order to appropriately prioritize funds while assuming responsibilities for compliance oversight in those key areas.

A process to review and prioritize corrective actions to improve Park access for visitors with disabilities should be developed. In addition, a strategy and timeline should be outlined to conduct accessibility assessments of facilities and programs as they are changed or updated so that any deficiencies may be



entered into FMSS, and proposed corrective actions can be cost estimated to serve future planning and budget requests.

A process to review all new construction and renovation plans or designs should be implemented to ensure the minimum accessibility standards and guidelines are appropriately applied and opportunities for the application of universal design are seized. In addition, a process to inspect all construction projects for compliance with the minimum accessibility standards and guidelines should be established.

Park Management should identify qualified local service providers for real time captioning and sign language interpreters. A policy should be implemented where the request for these services must be received a specified number of days in advance. The policy should be publicly posted in the program marketing materials including brochures, advertisements, the Park website, etc.

Provide staff training for full-time staff, seasonal staff and volunteers on select topics including the application of the accessibility standards and guidelines for Park maintenance; the principles of universal design; program access; methods for developing accessible interpretive programs; the accommodation process; techniques for interacting with people with disabilities and the use of people first language. Interpretive staff should receive more specific training on the provision of audio description for people with visual impairments and tailoring talks for people with cognitive impairments. Frontline customer service staff should also receive a seasonal update on accessibility improvements in order to field and/or refer questions on accessibility from the public.

An ongoing evaluation of programs, services and activities should be instituted to ensure the Park is meeting the needs of visitors with disabilities.