

Weir Farm National Historic Site Accessibility Assessment

Summary Report Findings and Recommendations

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National Park Service
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Assessment Dates: May 4 & 5, 2011

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II. Final Locations as Identified in FMSS

47366 – Burlingham House (Visitor Center)
47374 – Barn
47051 – Weir House
47052 – Weir Studio
47286 – Young Studio
47852 – Waysides (Asset #1127753)
48241 – Pond Trail
47852 – Parking Lot (Asset #1095787)
47365 – Grounds
47847 – Aggregate surface access routes (i.e. between Visitor Center and Barn) (Asset #411794)
237272 – Paved asphalt access route (Accessibility Walkway)

III. Park Purpose, History & Themes

The Weir Farm National Historic Site (WEFA) preserves the artistic legacy that was begun by J. Alden Weir in 1882. Now a unit of the National Park Service, Weir’s summer home served as a creative refuge for the Weir family, friends and fellow artists. Weir is considered a respected contributor to the American art realm and is credited with influencing the development of American Impressionism. Two other artist families resided on the property after Weir, and their influence on the land and landscape is also apparent in various works of art.

Visitors come to Weir Farm to experience the landscapes and historic structures and to create art in various forms. Innumerable pieces of artwork have been born from the influential and inspiring

landscapes found at Weir Farm. The National Park Service is charged with preserving that legacy and maintaining the landscape for future generations of artists.

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 the Weir Farm National Historic Site, the NCA assessment team conducted an accessibility assessment of the physical and programmatic elements conducted at the historic site including the Visitor Center, Weir House, Barn, Weir and Young Studios, and Pond Trail. In addition, key Park personnel were interviewed to develop a broad range of recommendations for improving access for visitors with disabilities. During the time of assessment, the Weir House, Weir Studio, and Young Studio were undergoing restoration and closed to the public. It is the responsibility of Park management to ensure that the accessibility standards are applied during all stages of the renovation process and that the buildings are both physically and programmatically accessible to all visitors when opened to the public.

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 Weir Farm National Historic Site, 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 accessible route. 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. While an accessibility section of the website exists, it provides only partial information on the accessibility of the Park. No information is provided regarding the accessibility of the grounds and trail system. Park management should be commended for providing information regarding the availability of auxiliary aids and services including assistive listening and audio description; however, the procedure to request a sign language interpreter or other accommodations, and the contact information for the Park's Accessibility Coordinator is not provided.

The recommendation is to alter the accessibility section of the Park website to include comprehensive information about the Park's accessible features and services for visitors with disabilities, including, but not limited to, existing physical accessibility barriers, planned improvements, and maintained accessible features of each Park area. Enhance the 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 and trails 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 Other Power Driven Mobility Devices, and review and update the Park's policies on the issues. Update the existing information in the "Pets" section of the website, and include the same information in the "Accessibility" section. 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 Weir Farm National Historic Site. Absence of a tactile map/model depicting the Park features and landscapes 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/model of the Park. A tactile orientation to the Park should identify the location of buildings, walkways, trails, and contour of the landscape throughout the site. The map/model 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 of

varying topographies such as forest, water and trails. The tactile map/model should include components such as raised lines and scale orientation options. The map/model 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.

The Park's unigrid brochure and all other readily available publications should be converted to Braille, designed for large print, and formatted for audio and electronic distribution. Utilize the Harpers Ferry Center large print brochure template to adapt all primary standard Park brochures to large print. In addition, convert the content for the primary standard Park brochures to Braille, electronic text file (.txt, .rtf, .doc), and audio (cassette, CD, mp3), and maintain the alternate formats in stock for visitor request. Provide signage at the information areas and a notice on the Park website stating that the information is available in alternate formats. Develop a procedure for converting the content of secondary brochures into 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 and audio description, 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

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 include high-contrast, no glare, sans serif or simple serif font and font size appropriate for viewing distance and height. An audio description program should communicate the interpretive content for visitors with visual impairments. Tactile elements should be integrated to effectively communicate the primary interpretive themes and unique Park features to individuals who are blind, have low vision, or are cognitively impaired. Maps of the Park, including the buildings and trail system, should be made tactually available for all visitors.

The interpretive panels in the Visitor Center present a barrier for individuals with low vision due to insignificant font size, type and contrast, glare, shadow, and lack of tactile elements. 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 Park shall work with a consultant to determine a replacement schedule for those panels that create the most significant barriers to persons with

disabilities. As panels are replaced, ensure that sufficient text size, font and contrast is provided. Font shall be sans serif or simple serif. Contrast shall be between 70 percent minimum and 95 percent maximum. Ensure that text is readable against any background image. Italics shall be used minimally. 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.). Include the most pertinent information contained on the interpretive panels into the proposed audio described tour of Weir Farm.

There are deficiencies to the lighting scheme in the Burlingham House that present a barrier for individuals with low vision. Overhead lighting creates glare on the surface of the exhibit panels or cases, washing out segments of text, images, and displays. Park management shall work with a design consultant to adjust the lighting for exhibits in the Burlingham House. There must be sufficient lighting on objects to make them visible to all visitors unless the light level will do substantial damage to the objects. When not prohibited from doing so by conservation requirements, provide at least 100-300 lux of light on an object. Particular attention should be given to details such as glare, shadows and low lighting. Provide sufficient, even light for exhibit text. Where prohibited from providing the full 100-300 lux of light due to conservation requirements, exhibit text should have no less than 10 foot-candles (fc) of illumination, with a working usable range of between 10 and 30 foot-candles. Avoid harsh reflections and glare. This includes finishes for text panels that are highly reflective, such as glossy or metallic surfaces. The lighting system shall be flexible enough to allow adjustments on-site.

Exterior wayside exhibits display graphic and textual interpretive information for Park visitors. At the time of assessment, the Park had one wayside exhibit installed adjacent to the parking area. The interpretive information is not presented in a format that is accessible for people with visual and cognitive impairments. Current and future exterior interpretive programs throughout the Park should be evaluated and prioritized to develop a new interpretive program of wayside exhibits, maps and models where the information is presented in multiple modes of delivery including graphic, textual, audio, and tactile information. Wayside exhibits should be installed along an accessible route, outdoor recreation access route, or accessible trail, and include tactile indicators in the pathway surface system to indicate to people they are approaching a wayside with interpretive information. The physical accessibility guidelines for the exhibit panels include installation in relation to the accessible route, panel viewing height and viewing angles, clear floor or ground space that is firm and stable, and unobstructed views of exhibits and Park features. Where exhibits are placed at inaccessible locations, consider posting wayside content on the Park website. Wayside exhibits shall be regularly maintained to ensure accessibility of information for all visitors.

There are limited tactile exhibit components available to provide an equal program experience for individuals who are blind, have low vision, or are cognitively impaired. The Park shall work with an interpretive media and design specialist to create tactile models of those elements that are reflective of the major interpretive themes of the historic site. Some interpretive elements to consider producing as

a tactile experience include the ceiling of the Weir studio, the interior architecture of the Young Studio, and unique period furnishings in the Weir House. Include the models in the recommended comprehensive audio described tour of the Weir Farm National Historic Site.

None of the visual elements of the Weir Farm National Historic Site are audio described for individuals 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 exhibits, furnishings, buildings, 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 in addition to the location of each building provided throughout the site; the interior spaces and interpretive components of the Burlingham House, Weir Studio, Barn, Young Studio, Weir House, Artist Residence, and Pond Trail; the exterior interpretive elements (i.e. waysides); photos and text on interpretive panels; any exhibits that are displayed behind barriers (i.e. cases, ropes) and therefore not intended as a tactile experience; video displays or computer-operated exhibits; and all tactile components throughout the exhibit areas. In addition to providing a programmatic alternative solution to interpretive visual elements of the Park 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. Ensure that the equipment is hands-free or has a hands-free option (so that visitors can explore their surroundings tactilely), is able to be independently operated, and is hearing-aid compatible.

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 reception areas indicating that the assistive listening system and audio description is available and market their availability through brochures, program announcements and the Park website.

Assistive Listening System

At the time of assessment there was no assistive listening system available for the video program shown in the Visitor Center. Park senior management has indicated that since the time of assessment an assistive listening system has been purchased and is available for visitor use. The Park shall ensure that the recently purchased equipment includes a minimum of two assistive listening receivers and one base transmitter dedicated for theater use. Both of the receivers shall be hearing-aid compatible. Signage that includes the International Symbol of Access for Hearing Loss shall be provided on the entry doors alerting visitors to the availability of the accommodation.

Audio Description

At the time of assessment, the primary Park film *Legacy of a Landscape: Weir Farm*, was not audio described for individuals who are blind or have low vision. Since the time of assessment, Park senior management has indicated that audio description has been integrated into the primary Park film. The Park shall ensure that signage is displayed and a notice is provided on the website alerting visitors to the availability of audio description.

A computer screen within the exhibit space in the Visitor Center shows a slideshow of artwork influenced by the landscape at Weir Farm. The slideshow runs on a 40 minute loop with each image projected for 15 seconds. There is no audio description of the visual program for individuals who are blind or have low vision. Description of the purpose and visual content of the slideshow shall be provided via podcast or integrated as part of the recommended audio described tour of the Park.

Open Captioning

The primary Park film, *Legacy of a Landscape: Weir Farm*, incorporates on-screen text identifying chapter selections for the film, titles of artistic works, and captioning for visitors who are deaf and hard of hearing. The on-screen text has poor contrast (i.e. yellow text over a red background), is a serif font, is often presented in italics, and incorporates shadow. The captioning text, at certain sections of the film, is lost within the background of the film (i.e. black and white text over black and white images). These features of the film create a barrier for individuals who have low vision. At the time of assessment, the film was not always shown with on-screen (open) captioning. Since the time of assessment, Park senior management has indicated that the recommended solution of digitally re-formatting the on-screen text and captioning to provide sufficient contrast and enhance the readability for individuals with impairments to vision has been completed. Additionally, the film is shown exclusively with open captioning. The Park shall ensure that the improved captioning includes font that is sans serif or simple serif, there is minimal use of italics, text does not appear in shadow, and that the contrast of the captioning is between 70 and 95 percent between text and background color. The new captioning shall be readable against any background image.

7. Talks and Tours

Portable Assistive Listening System

At the time of assessment there was no assistive listening system available for talks, tours, and special events. Park senior management has indicated that since the time of assessment an assistive listening system has been purchased and is available for visitor use. The Park shall ensure that the recently purchased equipment includes two portable multichannel receivers (both receivers shall be hearing-aid compatible) and two portable multichannel transmitters that are dedicated for use by interpretive staff conducting talks and tours in and around the Visitor Center.

Audio Description

The Park conducts ranger-led programs seasonally and upon request by organized groups. Interpretive staff should receive training on the provision of audio description for people with visual impairments

and tailoring talks for people with cognitive impairments who attend public programs conducted and/or hosted by the Park.

While there was no existing self-guided audio tour or cell phone audio interpretation delivery system in place at the time of assessment, it should be noted that the development of any type of new interpretive program should meet the minimum requirements of Section 508 for electronic and information technology, and the program access standard mandated by Section 504 of the Rehabilitation Act. Wherever communication is made with visitors, the communication should be as effective for people with disabilities as it is for people without disabilities. Use of new technology, such as cell phones, smart phones, MP3 players, and portable GPS should include purposeful planning to accommodate the range of needs of people with hearing loss, people with visual impairments, people with mobility impairments, and people with cognitive impairments. Consideration should also be given to the diversity of the Park visitor population including those traveling with children, older adults, large groups, and individuals who may not own or have access to such devices.

The Park shall not require an individual with a disability to utilize his or her personal technological device in order to receive the interpretive message, in particular, the delivery of audio description. Where future audio tour programs are implemented, the Park should consider preloading the media content onto an accessible MP3 player, or other device, to include the audio program and an audio described version of the audio program for visitors with visual impairments who request this accommodation. This method of communication shall be investigated as a means of providing the interpretive information without requiring the visitor to have/carry a personal cell phone, and possibly to deplete their available minutes and/or battery life.

Virtual Tour

Due to the natural contour of the landscape, the Weir Studio is not accessible to some individuals with physical disabilities. Similarly, the Young Studio, due to the narrow width (28 ½ inches) and change in level (5 inches) at the entrance, some visitors with physical disabilities may be excluded from the interpretive program opportunity. Any programmatic presentation must be equal to the quantity and quality of the original on which it is based so as to provide an equitable experience for the user. While physical alterations to the entryway of the Young Studio have been recommended for improved access for individuals with disabilities, it may be infeasible to comply with the accessibility standards due to the historic fabric of the site. However, completion of physical alterations to the Young Studio, in compliance with the accessibility standards, may negate the need to provide an alternative program experience.

In order to address the needs of the widest range of visitors, the Park shall consult with an interpretive media specialist to provide a virtual tour of the Weir and Young Studios for individuals who are not physically able to access the spaces. During the accessibility assessment, Park staff identified the possibility of providing a video or virtual tour of the Weir and Young Studios in the kitchen area of the Weir House. The necessary technology and equipment should be explored and acquired to provide the alternative programmatic experience for individuals with disabilities. Any video production made by or on behalf of the National Park Service shall include open captioning, audio description, and be available

for use with an assistive listening system per Section 508 of the Rehabilitation Act and the NPS Audio-Visual Accessibility Initiative.

8. Physical Building Elements

Below is a summary of the major physical accessibility deficiencies, by area, found at the Weir Farm National Historic Site. 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 18 total parking spaces provided in the visitor parking lot. One space is intended for accessibility; however, the aggregate surface of the parking lot is not firm and stable and the existing signage does not comply with minimum requirements for an accessible parking sign. Since the time of assessment, Park senior management has indicated whiskers have been installed into the aggregate surface to designate the accessible parking area. While the whiskers may meet the requirement for marking of the accessible parking space and access aisle, the deficiency of having a non-firm and non-stable aggregate surface has not been addressed. A minimum of one permanently designated van accessible parking space is required. The existing parking area will require grading and installation of a firm, stable and slip resistant surface material (asphalt is recommended) to provide one van accessible parking space with an adjoining access aisle. Additional grading and surfacing may be required in order to provide an accessible route from the accessible parking area to the crosswalk to the Visitor Center. Ensure a maximum slope of 2.08 percent in any direction within the accessible parking space and the access aisle. Provide permanent vertical signage at the front, center of the accessible parking space that contains the International Symbol for Accessibility and the designation "van accessible".

The paved asphalt route on each end of the crosswalk leading from the parking area to the Visitor Center has running slope that significantly exceeds maximum requirements for accessibility. The slope of the route nearest the parking area also does not permit the recommended level clear ground space at the Park's only wayside exhibit. Both asphalt sections on either side of the roadway shall be removed, graded, and paved to correct for running slope in order to provide an accessible route from the parking area to the Visitor Center. Each new route section shall have a maximum running slope of 5 percent and maximum cross slope of 2.08 percent. Accessible routes with running slope between 5 and 8.33 percent shall be considered a ramp and are required to have handrails and edge protection installed on both sides of the ramp run. Routes exceeding 8.33 percent cannot serve as accessible routes. During renovation, the slope of the ground surface at the wayside adjacent to the parking area should be corrected to provide a level clear ground space for either a forward or parallel approach. If a level clear ground space cannot be provided in this area, the wayside should be relocated in order to ensure compliance with the recommendations for accessibility.

Accessible Routes

The beginning of the paved asphalt route at the northeast corner of the Visitor Center and continuing north to the Weir House was designed to comply with the accessibility standards; however, at the time of assessment there were multiple sections of the paved pathway that exceeded maximum requirements for running and cross slope. Since the time of assessment, Park senior management has indicated that the corrective actions have been taken to ensure that the entirety of this route complies with the accessibility standards. The Park shall ensure that the accessible route is maintained to comply with the requirements for accessibility. Cross slope of an accessible route shall not exceed 2.08 percent maximum, and the running slope of an accessible route shall not exceed 5 percent maximum in order for the route to be considered accessible for persons with disabilities. Accessible routes with running slope between 5 and 8.33 percent shall be considered a ramp and are required to have handrails and edge protection installed on both sides of the ramp run.

The accessible route from the Visitor Center to the Weir House crosses a vehicular intersection (Pelham Lane). There are no marked pedestrian crossings (i.e. crosswalk) or signage provided at the roadway. In the event that the accessible route must cross vehicular traffic areas, marked crossings enhance pedestrian safety, particularly for people using wheelchairs and other mobility aids. The Park should evaluate the existing speed limit and any existing warning signs to determine if there are adequate precautionary measures to ensure safety for all pedestrians.

There are multiple deficiencies to the accessible routes to the various buildings and features of Weir Farm. Many areas do not have designated routes due to the preservation of the historic landscape and maintenance of the natural grass surface. Natural grass surfacing does not ensure a firm, stable, and slip resistant surface for accessible routes. The existing aggregate surface route beginning at Pelham Road and continuing toward the Weir House has running slope that exceeds maximum requirements. Park management shall work with design and cultural landscape services to designate permanent accessible routes to the buildings and features of Weir Farm. The accessible routes shall have a surface material that is firm, stable and slip resistant. Surfacing options include geotextiles, $\frac{3}{4}$ inch minus crushed and compacted aggregate, granite pavers, and asphalt (where appropriate). A continuous accessible route should be provided beginning at Pelham Road and connecting to the Weir House, Young Studio, Barn, and Secret Garden. Accessible routes shall be a minimum 36 inches wide (a minimum 60 inches wide route is recommended as best practice), have running slope no greater than 5 percent maximum, cross slope no greater than 2.08 percent maximum, openings no greater than $\frac{1}{2}$ inch in diameter and vertical changes in level no greater than $\frac{1}{4}$ inch.

A series of temporary fold-out ramps are available upon request for visitors using assistive mobility devices (i.e. wheelchairs) that cannot independently overcome the steps leading to the Visitor Center entrance and between the theatre and exhibit area/bookstore at the interior of the building. There are three separate elevation changes between the roadway and the doorway serving the Visitor Center entrance nearest the theatre. The total change in elevation between the roadway and the doorway serving the Visitor Center entrance nearest the information desk is 30 inches. The total elevation change between the roadway and the theatre entrance is 36 inches. The total change in level between the

interior rooms of the Visitor Center is 12 inches. Deployment of the temporary ramp at the interior of the Visitor Center blocks the exterior doorway used as the accessible entrance. The temporary ramps do not meet minimum requirements for accessibility due to excessive slope, openings in the ramp surface, and lack of handrails. Additionally, the interior doorway between the theatre and exhibit area has a maximum clear width of 31 inches which does not meet the minimum requirement of 32 inches for accessibility. Park management shall consult with design services and a historic architect to provide a permanent accessible means of entry into and throughout the interior of the Visitor Center. Accessible routes shall not have running slope greater than 5 percent, and cross slope shall not exceed 2.08 percent. Any portion of an accessible route that has running slope between 5 and 8.33 percent shall be considered a ramp and requires the installation of handrails and edge protection complying with ABAAS 505. Vertical changes in level along accessible routes shall not exceed ¼ inch in height.

The loose gravel and compacted dirt surface of the roadway/pedestrian route from Nod Hill Road to the Burlingham Barn (restrooms) is not firm and stable. Accessible routes shall have a firm, stable and slip resistant surface. The roadway/pedestrian route shall be resurfaced with ¾ inch minus aggregate, installed in two 3-inch lifts with rolling and compaction at each level, providing a total depth of six inches to ensure a firm, stable and slip resistant surface. The existing width of the route shall be maintained during renovation. The running slope of the route shall not exceed 5 percent maximum and cross slope shall not exceed 2.08 percent maximum. Ensure that in the newly created accessible route that there are no openings greater than ½ inch in diameter and that any vertical change in level is no greater than ¼ inch.

There are deficiencies to the entrance of the Young Studio that would prevent an individual with a mobility disability from entering the space. The limited clear width at the doorway and change in level at the threshold present significant barriers to accessibility. Park management shall consult with design, landscape, and historic architect services to provide a permanent, accessible route and entryway to the Young Studio. Elevation of the surrounding landscape and widening of the existing doorway are recommended in order to achieve compliance with the accessibility standards. If it is deemed impracticable to alter the Studio entrance, a programmatic alternative is required in order to provide an equivalent experience for persons with disabilities who are unable to enter the space. A virtual tour of the Young Studio is recommended as a programmatic alternative.

Restrooms

At the time of assessment, directional restroom signage was installed at the exterior of the Burlingham Barn. It was recommended that the sign be replaced since it was cracked and installed too low to be viewable within the maintained landscape. Since the time of assessment, Park senior management has indicated that the sign has been replaced. The Park is encouraged to confirm that the new sign incorporates the International Symbol for Accessibility, meets minimum recommendations for contrast, and is installed to permit the height of the visual characters at 40 inches minimum above the ground surface.

There are multiple barriers to accessibility in the single user restroom in Burlingham Barn: signage is installed on the door and does not contain raised characters or Braille; lavatory pipes are not wrapped to protect against contact; the angled mirror is installed beyond maximum height requirements measured to the bottom of the reflective surface; the centerline of the floor mounted water closet exceeds maximum requirements at 19 inches from the side wall; the continuous L-shaped grab bar does not meet minimum length requirements at the rear of the water closet, exceeds maximum height requirements to the top of the gripping surface, and the space between the wall and grab bar is not consistent at 1 ½ - 1 5/8 inches; the framed utility panel in the wall obstructs the use of the side grab bar. The following corrective actions were recommended in order to ensure compliance with the accessibility standards: provide compliant restroom signage that includes Braille, raised characters, pictograms, and the International Symbol for Accessibility, installed on the wall to the latch side of the door; wrap pipes beneath the lavatory to protect against contact; replace the angled mirror with a flat mirror, as the angled units can provide a distorted view of the user, and install to comply with height requirements; remount the floor mounted water closet on an offset flange to comply with requirements for centerline; remove and dispose of the continuous L-shaped grab bar and replace with separate rear and side grab bars; alter the utility panel to ensure a minimum 12 inches of unobstructed wall space above the side grab bar.

9. Trails

According to the Draft Final Accessibility Guidelines for Outdoor Developed Areas, a trail is defined as, “a pedestrian route developed primarily for outdoor recreational purposes. A pedestrian route developed primarily to connect elements, spaces, or facilities within a site is not a trail.”

Where the Park determines that a specific portion of a trail does not permit full compliance with the trail guidelines of the Draft Final - Outdoor, the Park shall ensure that the trail complies with the guidelines to the maximum extent feasible. The Park shall document the basis for the determination, and shall maintain the documentation with the records for the construction or alteration project.

A common misconception among park and recreation practitioners is that the “program access” standard under Section 504 of the Rehabilitation Act only applies to staffed, structured, traditional programs, such as specially scheduled interpretive tours. The program access standard applies to every good, service or activity provided by the Park to the public, including trails. In addition to assessing the trails for physical access, the programmatic elements offered on the trail were also assessed. Program access on trails encompasses more than just information provided on waysides or interpretive panels; it includes the entire experience that the trail offers to a visitor. The experience could include prominent features found along a trail, facilities and/or amenities along the trail, or a type of environment provided on a trail that may not be found elsewhere within the Park. Therefore, it was necessary to first look at the trail in its entirety, and then each unique trail segment, to adequately determine if visitors with disabilities are being offered equal programmatic experiences on the trail.

The Pond Trail was evaluated by the assessment team from the National Center on Accessibility. The trail offers a natural, environmental experience for a variety of recreational purposes. Areas of the trail are utilized for artist programming (i.e. painting and drawing) and special events (i.e. annual Easter egg hunt). The existing terrain and natural surface of the Pond Trail could present a significant barrier to some individuals with disabilities. There are two primary points of entry to the Pond Trail. The first point of entry, closest to the Caretaker's House, includes a series of stone steps and a significant change in elevation resulting in excessive running slope. The second point of entry involves a break in the historic stone wall along Nod Hill Road leading to a social trail that has a minimum tread width of 10 inches and excessive slope over a rock and natural surface ledge. There are multiple trail segments that exceed the maximum recommendations for running slope and contain tread obstacles due to the presentation of the natural terrain and the integration of man-made/influenced bridges and stream crossings. There is no information provided for visitors regarding the accessibility of the Pond Trail.

While the entirety of the Pond Trail was evaluated for accessibility, it was determined that only the trail segment originating at the trailhead and extending across the dam could be modified for accessibility improvements. Beginning at the east end of the dam, the remainder of the loop around the Pond is considered exempt from accessibility improvements based on Exception 1 under Draft Final – Outdoor 1019.2: Compliance is not feasible due to terrain.

Accessible trailhead signage is recommended to alert visitors to the existing terrain of the Pond Trail so that an individual may make an informed decision on whether or not to traverse the trail. Accessible trailhead signs should contain a minimum of the following: the length of the trail or trail segment; surface type; typical and minimum tread width; typical and maximum running slope; and typical and maximum cross slope. The information provided on the signs should also be made available in alternate formats.

Park management should work with trail design and cultural landscape services to identify a third entry point to the Pond Trail and the means to integrate accessible trail features to the maximum extent feasible during alteration and rehabilitation of the Pond Trail. Additional detail regarding trail improvement recommendations can be found in the associated work order within the Facility Management Software System.

10. 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.

The existing sales and service counter does not feature a lower section for persons who are seated or of short stature. The existing counter that houses the NPS Passport Stamp exceeds maximum height requirements for accessibility at 45 ½ inches above the finish floor. The existing counter that houses gifts and merchandise is 28 inches above the finish floor which meets minimum accessibility

requirements; however, there is no section of the merchandise counter that could serve as the accessible counter section due to the incorporation of a wood counter backing, limiting the depth of the counter space, and the positioning of merchandise along the lowered section. The existing counter can be modified to provide a minimum 36 inches wide lowered counter section for individuals who are seated or of short stature by cutting away a portion of the wood counter backing and clearing merchandise from the designated area. Sales and service counters shall have a portion of the counter surface that is 36 inches long minimum and 36 inches high maximum above the finish floor. The accessible portion of the counter top shall extend the same depth as the sales and service counter top. Ensure that clear floor space is maintained, centered on the lower counter section, and positioned for a parallel approach.

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 physical and programmatic accessibility as is expected of the programs or services offered by the National Park Service. 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. Where possible, samples of products stored on higher shelves or hooks should be provided within accessible reach range.

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 Weir Farm National Historic Site.

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. The Park's accessibility management team will be instrumental in achieving this goal.