



Creating A More Accessible World For Everyone

Zion National Park Appendix A

**Self-evaluation of Policies and Practices and Evaluation for
Non-discrimination in Park Programs, Services and Activities**

September 30, 2016



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Zion National Park Self-evaluation and Transition Plan

Appendix A

Self-evaluation of Policies and Practices and Evaluation for Non-discrimination in Park Programs, Services and Activities

A Self-evaluation is an evaluation of the entities current policies and practices, and the effects thereof, and identifies those that do not or may not meet the requirements of Section 504. The Self-evaluation identifies modifications of any such policies and practices required; and outlines steps the agency needs to take to make the necessary modifications. The Evaluation for Non-discrimination in Park Programs, Services and Activities is an evaluation of programs provided and facilities associated with those programs to determine if the program discriminates against persons with a disability to meet the requirements set in Section 504:

17.549 Program accessibility: Discrimination prohibited.

Except as otherwise provided in §17.550, no qualified person with a disability shall, because the agency's facilities are inaccessible to or unusable by persons with disabilities, be denied the benefits of, be excluded from participation in, or otherwise be subjected to discrimination under any program or activity conducted by the agency.

Organization of Policy Requirements, Findings and Recommendations

The organization of the requirements, findings and recommendations for this Self-evaluation and Evaluation for non-discrimination are listed by location of the policy information:

1. Section 504 requirements (43 CFR Part 17)
 - a. Requirements for NPS programs (43 CFR Part 17, Subpart E)
 - b. Requirements for Concessioner and Contracted programs (43 CFR Part 17, Subpart B)
2. 36 CFR Parts 1 – 7, Superintendents Compendium
3. Federal Management Regulation (FMR), Subpart C—Architectural Barriers Act, §102-76.70 Disproportionate Cost, and §102-76.80 Setting Priorities for Alterations
4. Directors Order #16A Reasonable Accommodation for Applicants and Employees with Disabilities
5. Director's Order #42: Accessibility for Visitors with Disabilities in National Park Service Programs and Services

6. Other NPS Accessibility Policy and Procedures

1. Section 504 Requirements, Findings and Recommendations

Section 504 of the Rehabilitation Act requirements for the National Park Service are found in the Code of Federal Regulations (CFR) in Title 43 Public Lands: Interior, Subtitle A - Office of the Secretary of the Interior, Part 17 - Nondiscrimination in Federally Assisted Programs of the Department of the Interior.

43 CFR Part 17, Subpart B - Nondiscrimination on the Basis of Disability (covering entities that receive Federal aid i.e. grantees, contractors, concessions, etc.).

43 CFR Part 17, Subpart E - Enforcement of Nondiscrimination on the Basis of Disability in Programs or Activities Conducted by the Department of the Interior (covering programs provided by government entities).

These regulations require that each park makes the programs, services and activities offered in the park (when viewed in their entirety) accessible to visitors and employees with disabilities. A Self-evaluation is required to evaluate current policy and practices and identify ways to make the programs, services and activities affected by these policies accessible to individuals with disabilities.

Requirements for NPS programs (43 CFR Part 17, Subpart E):

1.1 §17.501 Purpose.

The purpose of this part is to effectuate section 119 of the Rehabilitation, Comprehensive Services, and Developmental Disabilities Amendments of 1978, which amended section 504 of the Rehabilitation Act of 1973 to prohibit discrimination on the basis of disability in programs or activities conducted by Executive agencies or the U.S. Postal Service.

1.2 §17.502 Application.

This part applies to all programs and activities conducted and/or administered and/or maintained by the agency except for programs or activities conducted outside the United States that do not involve persons with disabilities in the United States.

1.3 § 17.510 Self-evaluation

Requirements:

(a) A Self-evaluation is an evaluation of the entities current policies and practices, and the effects thereof, and identifies those that do not or may not meet the requirements of Section 504. The Self-evaluation identifies modifications of any such policies and practices required; and outlines steps the agency needs to take to make the necessary modifications. Self-evaluations

need to be conducted with the assistance of interested persons, including persons with disabilities or organizations representing persons with disabilities.

(b) The agency shall, for at least three years following completion of the evaluation required under paragraph (a) of this section, maintain on file and make available for public inspection—

(1) A list of the interested persons consulted;

(2) A description of areas examined and any problems identified; and

(3) A description of any modifications made.

Findings:

This document is the Self-evaluation for Zion National Park. It should be filed with other park policy documents, the superintendent's compendium, somewhere it can be reviewed and updated.

Recommendations:

This Self-evaluation (SE) will cover these requirements for the policies and practices reviewed. The park should continue to review all policies and practices to assure non-discrimination.

1.4 § 17.511 Notice.

Requirements:

The agency shall make available to employees, applicants, participants, beneficiaries, and other interested persons such information regarding the provisions of this part and its applicability to the programs or activities conducted by the agency, and make such information available to them in such manner as the agency head finds necessary to apprise such persons of the protections against discrimination assured them by section 504 and this regulation.

Although no specific method is required to reach the public, notice should be provided in a variety of formats and by using multiple types of media, such as the Park's website, bulletin boards in buildings, print, radio, social media, or television.

Findings:

ZION's Discrimination and Harassment policy and procedures are posted in employee areas, but not in visitor areas. This policy is not readily available on park websites and it is unknown if this statement is available through multiple types of media.

Recommendations:

Provide the public notice in a variety of formats and by using multiple types of media such as the Park's website, bulletin boards in buildings, print, radio, social media, or television. It is also recommended that the notice be available through an accessibility link on the ZION homepage. ZION's policy of non-discrimination on the basis of disability should be readily apparent in the normal channels used by visitors, employees and applicants for employment.

The prescriptive regulatory requirement to provide public notice of an entity's policy of nondiscrimination on the basis of disability is intentionally broad in its scope. It does not address the use of the internet or websites as use of the internet was not relevant Section 504 of the Rehabilitation Act was signed. The regulatory expectation is, that whatever media or methods are employed, the public statements, announcements, and invitations of a public entity will embody the entity's inclusion of people with disabilities and indicate the means by which individuals can request accommodations or other reasonable modifications to policies and practices. Regardless of the point of contact, whether virtual, in print, by telecommunication, physical access, or any method of broadcast communication, the public must have access to an entity's message of inclusion. A hyperlink to this information on the homepage of a website is analogous to a notice posted at the front entrance of a public building.

Add non-discrimination policy to park website on the accessibility page and in the park brochures and newspapers. Add to bulletin boards in VC

Notice example for use in the park newspaper, on bulletin boards and on website, etc.:

In accordance with the requirements of Section 504 of the Rehabilitation Act, Zion National Park will not discriminate against individuals with disabilities in its services, programs, or activities.

1.5 § 17.530 General Prohibitions Against Discrimination

Requirements:

§17.530 General prohibitions against discrimination. (a) No qualified person with a disability shall, on the basis of disability, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity conducted by the agency.

Section 504 prohibits a qualified individual with a disability from being excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity conducted by Zion National Park. The park shall administer programs or activities in the most integrated setting appropriate to the needs of qualified individuals with a disability.

MTC design and Section 504 specialists prepare a preliminary list of park programs, services, and activities provided from park provided documents, park website, concessioner websites, and review of documents in the NPS Electronic Technical Information Center (ETIC).

To prioritize programs found, MTC first identified:

- Park purpose and significance (from the park foundation plan, GMP, park enabling legislation, staff interviews, etc.)
- Park fundamental and important resources and values (from the park foundation plan, GMP, park enabling legislation, staff interviews, etc.)
- Park interpretive themes (from Park long range interpretive plan, park foundation plan, GMP, staff interviews, etc.)
- List of Park programs, activities and services

The purpose of looking at programs provided based on park significance, resources, and interpretive themes is to identify the core experiences, key programs, services and activities provided. This list is sent to the park for additions and edits. MTC and park staff (park management, natural and cultural resource specialists, interpretive and facility management division heads) meet on-site to work together to determine programs provided, and prioritize these programs based on:

- service need (information, food, lodging, transportation, comfort),
- core experience programs,
 - Interpretation
 - Recreation
- programs highlighted on the park website or newspaper
- and key programs common to all parks
 - visiting the superintendent in his/her office,
 - access to the park entrance sign photo-op,
 - park maps and wayfinding,
 - Junior Ranger program,
 - Web ranger program

This team then determines if there are duplicated programs that meet all the aspects of the program, and determines which of these needs to be accessible.

Findings:

MTC reviewed programs provided in the park and those highlighted on the park website. Many of the programs are not provided in alternative formats or are not physically accessible.

Recommendations:

These programs and activities are described and evaluated by topic or facility in this SETP. Physical recommended changes/solutions are included in the Transition Plan Database (TPD).

1.6 § 17.540 Employment

Requirements:

No qualified individual with a disability may, on the basis of disability, be subjected to discrimination in employment under any service program, or activity conducted by the Park. The definitions, requirements and procedures of section 501 of the Rehabilitation Act of 1973 (29 U.S.C. 791), as established by the Equal Employment Opportunity Commission in 29 CFR part 1613, shall apply to employment in federally conducted programs or activities.

Findings:

The NPS Equal Opportunity/Affirmative Action Policy was evaluated.

Recommendations:

Provide a clear definition of a “qualified individual with a disability” within the policy (WASO), park should include detailed essential functions of a position in the written job description to not discriminate against an applicant or employee with a disability.

Definition of a qualified individual with a disability (ADA.gov - U.S. Department of Justice Civil Rights Division):

A qualified individual with a disability is a person who meets legitimate skill, experience, education, or other requirements of an employment position that s/he holds or seeks, and who can perform the essential functions of the position with or without reasonable accommodation. Requiring the ability to perform "essential" functions assures that an individual with a disability will not be considered unqualified simply because of inability to perform marginal or incidental job functions. If the individual is qualified to perform essential job functions except for limitations caused by a disability, the employer must consider whether the individual could perform these functions with a reasonable accommodation. If a written job description has been prepared in advance of advertising or interviewing applicants for a job, this will be considered as evidence, although not conclusive evidence, of the essential functions of the job.

1.7 §17.549 Program Accessibility: Discrimination prohibited.

Requirements:

No qualified individual with a disability shall, because the agency's facilities are inaccessible to or unusable by individuals with a disability, be denied the benefits of, be excluded from participation in, or otherwise be subjected to discrimination under any program or activity conducted by the agency.

MTC design and Section 504 specialists prepared a preliminary list of Zion programs, services, and activities provided from the parks website, concessioner websites, and review of documents in the NPS Electronic Technical Information Center (ETIC).

To prioritize programs found, MTC first identified:

- Park purpose and significance (from the park foundation plan, GMP, park enabling legislation, staff interviews, etc.)
- Park fundamental and important resources and values (from the park foundation plan, GMP, park enabling legislation, staff interviews, etc.)
- Park interpretive themes (from Park long range interpretive plan, park foundation plan, GMP, staff interviews, etc.)
- List of Park programs, activities and services

The purpose of looking at programs provided based on park significance, resources, and interpretive themes is to identify the core experiences, key programs, services and activities provided. This list is sent to the park for additions and edits. MTC and park staff (park management, natural and cultural resource specialists, interpretive and facility management division heads) met on-site to work together to determine programs provided, and prioritized these programs based on:

- service need (information, food, lodging, transportation, comfort),
- core experience programs,
 - Interpretation
 - Recreation
- programs highlighted on the park website or newspaper
- and key programs common to all parks
 - visiting the superintendent in his/her office,
 - access to the park entrance sign photo-op,
 - park maps and wayfinding,

- Junior Ranger program,
- Web ranger program

This team then determined if there were duplicated programs that met all the aspects of the program, and determined which of these needed to be accessible.

Program Background Information:

Park Purpose and Significance Statements (2013 Zion Foundation Plan):

The purpose of Zion National Park is to preserve the dramatic geology including Zion Canyon and a labyrinth of deep and brilliantly colored Navajo sandstone canyons formed by extraordinary processes of erosion at the margin of the Colorado Plateau; to safeguard the park's wilderness character and its wild and scenic river values; to protect evidence of human history; and to provide for scientific research and the enjoyment and enlightenment of the public.

The following significance statements have been identified for Zion National Park. (Please note that the order of the statements does not reflect the level of significance.)

- Zion is a geologic showcase of brilliantly colored strata highlighted by sheer Navajo sandstone cliffs that are among the highest in the world and expose ancient remnants of the largest known sand dune system. Geologic processes continue today as the free-flowing Virgin River rapidly cuts into the margin of the Colorado Plateau, incising a multitude of deep, narrow canyons. An abundance of canyon springs, fed by groundwater, create hanging gardens and grottos that support endemic varieties of flora and fauna. These exceptional features and processes contribute to the outstanding scenery and scientific value of the park.
- Zion National Park's range of topography and location at the juncture of the Colorado Plateau, Mojave Desert, and Great Basin ecoregions have created the environment for a wide variety of life forms, including rare and endemic species that exist only in this small geographic area. This diversity of life forms provides opportunities for valuable scientific research.
- The Zion Wilderness preserves the undeveloped character and natural environment of the spectacular network of colorful deep sandstone canyons, high forested plateaus, and striking rock towers, as well as opportunities for visitors to experience a strong sense of solitude and remoteness from civilization.
- Utah's first designated wild and scenic rivers flow through the park carving a colorful labyrinth of canyons across layers of time. These rivers, fed by natural undiminished spring flows from the Navajo sandstone aquifers and sculpted by unimpeded torrents of flood waters, have an ecological value that far exceeds their spatial extent in the park.

- In a canyon environment, Zion preserves human history of the Ancestral Puebloan, Paiute, pioneers, early 20th century tourism, and NPS development along the Virgin River. The remarkable integrity of these resources provides a setting ideal for future education and research.
- Zion National Park is a world-renowned destination that offers opportunities for a range of recreational and educational experiences including passive activities and high adventure excursions. Visitors are able to step inside the scenery and can find themselves surrounded by narrow cliff walls in places of extraordinary scale such as the Virgin River Narrows. These experiences often create profound emotional and personal connections for a diversity of visitors.

Park Fundamental Resources and Values (2013 Zion Foundation Plan):

Fundamental resources and values are those features, systems, processes, experiences, stories, scenes, sounds, smells, or other attributes determined to merit primary consideration during planning and management processes because they are essential to achieving the purpose of the park and maintaining its significance.

- **Geologic Showcase.** Zion’s spectacular sedimentary layers form the center of the Grand Staircase, the great regional sequence of cliffs and slopes linking the ancient rocks of Grand Canyon, through the Mesozoic layers of Zion, to the high plateaus of Bryce Canyon and Cedar Breaks. Zion contains the finest exposure of Navajo sandstone, in places exceeding 2,000 feet in thickness, a remnant of the largest sand dune system known to have existed on the planet. In addition to the dramatic high cliffs, the park displays a landscape modified by recent volcanism and an exceptionally rapid rate of erosion. These natural processes have produced large landslides, inverted valleys, deep slot canyons, hanging valleys, and have exposed significant paleontological resources.
- **Water Shapes the Landscape.** The park’s many free- flowing rivers carry powerful flash floods and tremendous sediment loads, which act together as the primary agents of erosion. These rivers continue to carve into the edge of the Colorado Plateau, shaping Zion’s dramatic scenery. By virtue of rivers cutting through the water-bearing Navajo sandstone, numerous canyon springs, fed by groundwater, create hanging gardens and seeping alcoves that form moist oases in a desert environment and sustain perennial river flows.
- **Convergence of Ecoregions.** The convergence of the Colorado Plateau, Mojave Desert, and Great Basin ecoregions combined with the vertical relief and high concentration of canyons has provided a diversity of habitats for the array of life forms found in Zion National Park, including rare, endangered, and endemic species.
- **Natural Resource Quality and Function.** The quality of air, water, vegetation, and wildlife resources in Zion National Park are generally preserved, in some cases by

allowing natural processes and natural disturbance regimes (such as fires, floods, and rockfalls) to exist, thereby promoting an environment predominated by natural processes. Wildland fire, in particular, provides the natural disturbance regime that maintains many of the park's ecosystems and is critical to maintaining wilderness character and associated natural resource values.

- **Wilderness Character.** Eighty-four percent of Zion is designated wilderness, managed with restraint and humility to protect the natural character of the landscape. The vast majority of this wilderness is entirely undeveloped with no trails, campsites, or structures. Even in a park with millions of visitors each year one can explore and experience the sights and sounds of solitude.
- **Wild and Scenic Rivers.** Zion's wild and scenic rivers provide for a wide range of river values and are composed of more than 140 miles of free-flowing, largely undeveloped water courses that provide habitat for six native fish species. In recent geologic time, the rivers have sliced through rock layers' thousands of feet thick. The carved canyons provide habitat for the threatened Mexican spotted owl and cool canyon microclimates are home to hanging gardens where the endemic Zion snail resides.

Other Important Resources and Values:

- **An Engineered Way of Life.** The Zion Lodge / Birch Creek Historic District represents early economic development and tourism inside the Grand Circle and Southern Utah. Residences and maintenance buildings in the Oak Creek and Pine Creek historic districts are intricate pieces of early NPS history representing naturalistic / NPS-rustic construction. The Zion-Mt. Carmel Highway and tunnel represent the determination, innovation, and engineering feats of the early 20th century. Other roads, trails, ditches, bridges, cabins, and remnants of sawmills and homesteads showcase early pioneering efforts inside Zion National Park and NPS efforts to develop facilities for visitor access and accommodation. Parunuweap Canyon contains prehistoric, intact, and valuable cultural resources that provide a valuable insight to prehistoric ways of life. Zion preserves and studies these diverse cultures and their engineered ways of life in the desert environment.
- **The Remnants of Humanity's Past.** The cultural resources in Zion National Park encompass a continuum of human experience of both native and nonnative people. The nationally significant Parunuweap Canyon Archeological District contains "type" sites through which the Virgin Branch of the Anasazi were initially recognized as a distinctive regional manifestation of Ancestral Puebloan culture. For contemporary people, including American Indians and European American descendants of pioneers, many of the park's cultural sites, objects, landscapes, and natural

resources remain important touchstones that contribute to group identity and heritage.

- **Opportunities for Connection to the Resources.** Zion National Park provides its visitors a wide range of high- quality recreational experiences through exceptional infrastructure and services, educational opportunities, and resources of high integrity. Zion National Park interprets park resource meanings, research, and management initiatives to encourage inspiration, learning, and stewardship.
- **Preserving and Studying the Natural and Cultural History of Zion.** Museum and archival collections record Zion’s natural and cultural history. Park collections illuminate the stories of American Indians, pioneers, NPS history, and the park’s complex natural environment—documenting a long and highly active history of scientific study and scholarly research. The collection also demonstrates the ongoing importance of continued scientific study to develop and implement best management practices.

Interpretive Themes (2013 Zion Foundation Plan):

Interpretive themes are often described as the key stories or concepts that visitors should understand after visiting a park—they define the most important ideas or concepts communicated to visitors about a park unit. Themes are derived from, and should reflect, park purpose, significance, resources, and values. The set of interpretive themes is complete when it provides the structure necessary for park staff to develop opportunities for visitors to explore and relate to all of the park significances and fundamental resources and values.

- The geologic features of Zion National Park, including the premier exposure of Navajo sandstone, the brilliantly colored rock layers, and Zion’s place in the Grand Staircase, are both scientifically significant and allow us to immerse ourselves within their immense scope of size and time.
- The wild and scenic Virgin River and its tributaries are the lifeblood of Zion National Park, continuing to carve with powerful force as they drop uncontrolled through the landscape, to reveal Zion’s geologic history, shape majestic canyons, and provide a unique watery oasis amidst the arid land.
- Located at the convergence of three ecoregions, Zion National Park contains a richness and diversity of flora and fauna that belies the park’s extreme topography and arid conditions.
- The undeveloped vast high plateaus and intimate sandstone canyons of Zion National Park and its designated wilderness provide unparalleled opportunities for a limited number of visitors to experience solitude, adventure, inspiration, and introspection in a

natural environment, while creating a backdrop for all to appreciate the importance of protecting wild places.

- Zion National Park is the setting for a legacy of generations of people, all of whom lived their lives deeply connected to this landscape.

Zion Core Experiences

MTC met with the park management team to review the Park Purpose and Significance Statements, Park Fundamental Resources and Values, and Park Interpretive Themes to add new values and determine Zion Core Experiences:

Zion Core Experiences

- Understand the geologic features of Zion National Park, including
 - o premier exposure of Navajo sandstone
 - o brilliantly colored rock layers
 - o Zion's place in the Grand Staircase
- Understand how water helped to form Zion National Park, including
 - o The wild and scenic Virgin River and its tributaries
 - o continuing to carve with powerful force
 - o provide a unique watery oasis amidst the arid land.
- Understand the flora and fauna of Zion National Park
 - o convergence of three ecoregions
 - o rich and diverse
 - o extreme topography and arid conditions
- Understand the importance of wilderness areas in Zion National Park
 - o provide unparalleled opportunities for a limited number of visitors to experience solitude, adventure, inspiration, and introspection in a natural environment
 - o creating a backdrop for all to appreciate the importance of protecting wild places
- Understand that Zion National Park is a wild and dangerous place
 - o Heavy rainstorms and instant, powerful flash floods
 - o Dangerous sandstone cliffs
 - o Dry, arid conditions cause rapid dehydration
 - o Animals encountered are wild and unpredictable
- Understand the cultural history of Zion National Park
 - o Native Americans
 - o Pioneers
 - o NPS history
 - Zion Lodge / Birch Creek Historic District
 - The Zion-Mt. Carmel Highway and tunnel

- Zion National Park is a place for recreation
 - Camping/Picnicking
 - Hiking/Backpacking
 - Birding
 - Canyoneering/Climbing
 - Ranger-led activities
 - River trips
 - Photography
 - Scenic drives and overlooks
 - Bicycling
 - Horseback riding

Zion National Park Services and Programs

- Visitor Services
 - Information
 - Website
 - Accessibility information
 - All accessible programs identified
 - Wifi
 - Visitor Center
 - Information Desk
 - Alternative formats
 - Knowledgeable staff – knows accessible programs, assistive devices available and use, can assist visitors with disabilities
 - Wayfinding
 - Maps
 - Accessible facilities and programs identified
 - Waysides
- Guest services
 - Food
 - Red Rock Grill Dining Room at Zion Lodge
 - Elevator access
 - Castle Dome Cafe at Zion Lodge
 - Picnic areas
 - Zion VC
 - Grotto
 - Nature Center
 - Lava Point
 - Kolob Canyons
 - Lodging
 - Zion lodge
 - Motel rooms
 - Cabins
 - Suites
 - Camping
 - Reservation - Watchman
 - RV back-in, electric
 - RV pull-through, electric
 - River view sites, electric
 - Tent sites, electric and non-electric
 - Group camping
 - First come, first served camping - South

- RV back-in
 - RV pull-through
 - River view sites
 - Tent sites
 - Group camping
 - Primitive – Lava Point
 - Backcountry – Hop Valley
 - Campground host sites – South and Watchman
- Transportation
 - Maps and wayfinding
 - Park shuttles
 - Size and weight limitations on wheelchairs
 - Narration script available
 - Open air tram
 - Private Vehicle
 - Accessible drop-offs
 - Accessible parking
 - Special Permit
 - Lodge
 - Special needs
 - Backcountry access
 - Comfort
 - Restrooms
 - Baby changing stations
 - Restroom amenities
 - Companion care restrooms
 - Other services
 - Mail drop at VC and Zion Lodge
 - Gift Shops
 - Bookstores
 - Business Center at the Lodge
- Core Experience - Interpretation
 - Geology - Understand the geologic features of Zion National Park; including premier exposure of Navajo sandstone, brilliantly colored rock layers, and Zion's place in the Grand Staircase
 - Trails
 - Nature Center, ZCFI
 - Exhibits
 - Waysides
 - Films, multi-media, social media, shuttle audio program
 - Ranger led Programs, formal, shuttle tour, and drop-ins
 - Junior Ranger Program

- Website, park brochure, park newspaper
- o Water - Understand how water helped to form Zion National Park; including the wild and scenic Virgin River and its tributaries, continuing to carve with powerful force, and provide a unique watery oasis amidst the arid land.
 - Trails
 - Nature Center, ZCFI
 - Exhibits
 - Waysides
 - Films, multi-media, social media, shuttle audio program
 - Ranger led Programs, formal, shuttle tour, and drop-ins
 - Junior Ranger Program
 - Website, park brochure, park newspaper
- o Flora and Fauna (F&F) - Understand the flora and fauna of Zion National Park; convergence of three ecoregions, rich and diverse, extreme topography and arid conditions
 - Trails
 - Nature Center, ZCFI
 - Exhibits
 - Waysides
 - Films, multi-media, social media, shuttle audio program
 - Ranger led Programs, formal, shuttle tour, and drop-ins
 - Junior Ranger Program
 - Website, park brochure, park newspaper
- o Understand that Zion National Park is a wild and dangerous place
 - Trail exhibits and waysides
 - Website, park brochure, park newspaper
 - Ranger led Programs, formal, shuttle tour, and drop-ins
 - Nature Center, ZCFI
 - Junior Ranger Program
 - Films, multi-media, shuttle audio program
- o History - Understand the cultural history of Zion National Park, Native Americans, Pioneers, and NPS history
 - Zion Lodge / Birch Creek Historic District
 - The Zion-Mt. Carmel Highway and tunnel
 - Zion Human History Museum
 - Exhibits
 - Waysides
 - Films, multi-media, social media, shuttle audio program
 - Written guide and app
 - Ranger led Programs, formal, shuttle tour, and drop-ins
 - Junior Ranger Program
 - Nature Center
 - Website, park brochure, park newspaper

- o Web Ranger program
- o Web education programs
- Core Experience – Recreation
 - o Camping/Picnicking
 - o Hiking/Backpacking
 - o Scenic walks
 - o Birding
 - o Canyoneering/Climbing
 - o Ranger-led activities
 - o River- water play, water access, Narrows hike
 - o Photography
 - o Scenic drives and overlooks
 - o Bicycling
 - o Horseback riding
 - o Shuttle ride
- Key programs common to all parks
 - o visiting the superintendent in his/her office
 - o access to the park entrance sign photo-op
 - o park maps and wayfinding
 - o Junior Ranger program
 - o Web ranger program
- Special Programs
 - o Artist in Residence, Grotto
 - o Zion Canyon Field Institute (ZCFI) programs

Findings:

- This section is used to define and prioritize the programs, services and activities provided at Zion National Park. The Foundation Plan lays out many planning needs and data collection needs for the park, included in the tables below. Most of these plans will impact how visitors with disabilities will experience park resources, however, the notes column in the table does not address accessibility or non-discrimination. Only one item in the table includes any accessibility needs: Park operations and facilities data needs states: data collection would focus on information to enhance visitor safety and accessibility. It is crucial to include an accessibility component in these plans to avoid discriminating against visitors and employees with disabilities. The plans and data needs highlighted in blue should include an accessibility/nondiscrimination component:

Planning Needs – Where A Decision-making Process Is Needed			
FRV – fundamental resources and values, OIRV - other important resources and values			
Related to an FRV or OIRV?	Planning Need	Priority (High, Medium, Low)	Notes
FRV	Visitor use management plan	High	The plan would address visitor use levels and patterns in key areas of the park, including Zion Canyon. It would establish a proactive process for managing characteristics of visitor use, the physical and social setting, and would establish a variety of strategies and tools to sustain desired resources conditions and visitor experiences. Visitor use characteristics could include the amount, type, timing, and distribution of visitor use, and visitor activities and behaviors.
FRV	Virgin River restoration strategy	High	The strategy would address site planning, design, and compliance for the removal of levees and other bank stabilizations that impede natural river processes along the North Fork Virgin River.
FRV	Zion Canyon transportation plan	High	The plan would address multimodal transportation options and consider trail linkages between shuttle stops to improve visitor opportunities.
OIRV	Cultural resource sites management plan	High	The plan would address the protection and management of select cultural sites, including petroglyphs and pictographs.
FRV	Commercial services plan	High	The plan would help the park determine which commercial services are necessary and appropriate in the developed areas of the park and how they should be managed.
FRV	Comprehensive sustainability strategy	High	The plan would include a sustainable fuels and fleet operations plan and an integrated solid waste management plan.
OIRV	Historic structures reports	High	The historic structure reports would include inventory of historic structures, important character-defining architectural features, use history, detailed current condition data, threats, cyclic maintenance requirements, and preservation treatments.
FRV	South entrance reconfiguration plan	High	The plan would develop a strategy for reconfiguring the south entrance (including campgrounds) to improve vehicle flow and wayfinding.
FRV	Scientific research strategy	Medium	The strategy would identify important scientific research needed to better understand and manage the park's fundamental resources and values.
FRV	Fire management plan update	Medium	The plan would be updated with current information and management strategies. This periodic comprehensive review is a requirement.
FRV	Trail management plan	Medium	The plan would include a trail inventory, new trail needs and locations, maintenance needs, and strategies to accomplish maintenance.
OIRV	Cultural landscape report	Medium	The plan would identify cultural landscapes in the park and how they should be protected and managed.
FRV	Climate change plan	Medium	The plan would include climate change scenario planning and an adaptation strategy. Cultural and natural resource condition assessments and climate change vulnerability assessments would be completed as part of the plan.

FRV	Education plan	Medium	This plan would identify the messages that park management wants to communicate to the on-site and off-site public, identify t to inform the target
	Resource stewardship strategy	Medium	nd natural resources in , and trends if possible, to protect resources.
FRV / OIRV	Collections management plan	Medium	The plan would address how to protect and manage the park's museum collections.

Data Needs – Where Information Is Needed Before Decisions Can Be Made			
Related to an FRV or OIRV?	Data Need	Priority (High, Medium, Low)	Notes
FRV	Visitor use data	High	Visitor use data would provide a better understanding of visitor preferences, visitor dispersal in the canyon as linked to shuttle bus ridership, and a better understanding of pedestrian use, vehicle use, necessary visitor services, and visitor-caused impacts to resources, facilities, and the experiential setting. The data would include information from the University of Idaho Visitor Services Project.
FRV	Visitor impacts on park resources	High	The effort would include gathering resource data from popular visitor locations, analyzing the data to determine the condition and trends, then identifying management strategies to improve conditions if needed.
FRV	Water quality	High	The data would include the continued collection of water quality parameters at existing monitoring sites and additional monitoring at new sites where there are threatened waters or where basic information is lacking.
FRV	Park operations and facilities	High	Data collection would focus on information to enhance visitor safety and accessibility.
FRV	Night skies	High	Updated data would include Zion-specific night sky data, trends, and management strategies to improve viewing of night skies.
FRV	Visual resource assessment	High	In order to protect and enhance wild and scenic values, complete a visual resource assessment for river segments with outstandingly remarkable scenic values.
FRV	Paleontology	High	The data would include inventory, monitoring, and management strategies to protect these resources.

A key component in communicating the interpretive core experiences to all visitors, including those with disabilities are the Interpretive ranger programs observed throughout the park at formal programs, shuttle tours, and the informal tactile, interactive, drop-in programs at many locations in the park. These programs are very effective in communicating the important stories of this park.

Recommendations:

The park planning needs identified in the Foundation Plan should include an accessibility component to avoid discriminating against visitors and employees with disabilities.

Recommendations include:

- Include sustainable, accessible river access (as required in ABAAS under beach access routes) for visitors and campers in the Virgin River restoration strategy
- Transportation Plan should include accessible options as well
- Commercial services plan needs to include accessible programs
- Historic structures reports need to include accessibility treatments in the treatment section – these plans are prepared by experts that can provide sensitive, integrated solutions that maintain character defining features while providing access.
- South Entrance plan needs to address access to the entrance sign photo-op, accessible campground, wayfinding to accessible programs, etc.
- The Education Plan should include strategies for providing programs to people that are blind or have low vision, are deaf or hard of hearing, those with mobility impairments, and those with cognitive disabilities.
- Etc.

These are just starting points when beginning these plans. Recommend having plans reviewed by accessibility specialists to avoid discrimination and future program access issues.

Interpretive programs – the ranger led programs are the main way that the key interpretive stories of Zion National Park are provided. Recommended ways to improve access to these programs:

- Yearly accessibility training for all interpretive staff
 - Disability awareness
 - Spontaneous audio description
 - Assistive devices
 - Methods for communication
- Providing assistive listening devices for large groups (easily available to rangers, training in operation)
- Provide meaningful tactile elements for the ranger drop-in locations
- Provide scheduled sign language programs for ongoing large group programs

- Provide alternative formats for the main publications; large print, audio guide, braille, tactile maps (such as bubble print or swell form paper), etc.
- Identify accessible programs and media on website and in newspaper

Non-discrimination in program access recommendations are included in the facility recommendations in Section 1.8 where the programs take place, in the policy recommendations in Sections 2 through 6 of this document, In the website evaluation and in the Transition Plan Database for each facility.

1.8 §17.550 Program Accessibility: Existing Facilities

Requirements:

(a) General. The agency shall operate each program or activity so that the program or activity, when viewed in its entirety, is readily accessible to and usable by persons with a disability.

This may require modification of policies and procedures to eliminate inadvertent discrimination and/or removal of architectural barriers to provide program access. With respect to the viewed in their entirety language of the regulation, identification of program, services, or activities that are unique to a specific building will be critical to determining compliance with program access requirements. In the event that a program, service, or activity is available only by being present in a specific facility, that facility must be accessible to and usable by qualified individuals with disabilities.

(d) Transition plan. In the event that structural changes to facilities are necessary to achieve program accessibility, the agency shall develop, within six months of the effective date of this part, a transition plan setting forth the steps necessary to complete such changes. The plan shall be developed with the assistance of interested persons, including persons with disabilities or organizations representing persons with a disability. A copy of the transition plan shall be made available for public inspection. The plan shall, at a minimum—

(1) Identify physical obstacles in the agency's facilities that limit the accessibility of its programs or activities to persons with a disability;

(2) Describe in detail the methods that will be used to make the facilities accessible;

(3) Specify the schedule for taking the steps necessary to achieve compliance with this section and, if the time period of the transition plan is longer than one year, identify steps that will be taken during each year of the transition period;

(4) Indicate the official responsible for implementation of the plan; and

(5) Identify the persons or groups with whose assistance the plan was prepared.

(See Appendix B for full text.)

Program access, when programs, services, and activities are provided in more than one location, can be achieved in light of the viewed in its entirety provision. All aspects of program access, such as policies and procedures considering other power-driven mobility devices, effective communication, reasonable modification, and service animals, must be considered when assessing physical barriers in the facilities of a federal entity. Adoption and implementation of such policies is critical to providing program access.

MTC design and Section 504 specialists prepared a preliminary list of Zion facilities and the programs, services, and activities provided at these facilities from a review of documents in the NPS Electronic Technical Information Center (ETIC), park documents and Asset Priority Index (API). The purpose of this list is to identify the types of facilities provided, and determine all facilities of each type in the park and determine distinct park areas for area SETP's. This list is sent to the park for additions and edits. MTC and park staff (park management, natural and cultural resource specialists, interpretive and facility management division heads) met on-site to work together to determine park areas with facilities provided, and the services and programs included at each facility, and prioritize these areas, facilities and programs based on

- service need (information, food, lodging, transportation, comfort),
- core experience programs,
 - Interpretation
 - Recreation
- programs highlighted on the park website or newspaper
- and key programs common to all parks

This team (park and MTC) then determined if there were duplicated programs that met all the aspects of the program, and determined which of these needed to be accessible.

Findings:

Self-evaluation of Programs at Zion Facilities by Facility Type

Visitor Centers and Museums

There are four visitor centers or museums at Zion National Park: Visitor Zion Canyon Visitor Center, Nature Center, Human History Museum and the Kolob Canyons Visitor Center. Each facility provides unique interpretive themes and all are important in communicating the fundamental resources and values of the park. The programs provided at each facility are not duplicated at a different facility; all programs provided at each facility need to be accessible to visitors with disabilities to meet the “when viewed in their entirety” requirement of Section 504.

Zion Canyon Visitor Center

From park website: *Zion Canyon Visitor Center - The starting point for any visit to Zion Canyon. Outdoor exhibits, information desk, wilderness permits, bookstore, restrooms, picnic area, and water bottle filling station. Ranger-led programs. Access to the Pa'rus Trail and Watchman Trail.*

Requirements:

Programs, services and activities provided at the Visitor Center need to be accessible to people (visitors and employees) with disabilities.

Findings:

- Interpretive Programs: the rangers at the information desk and wilderness desk provide information about the park, things to do, places to go, etc. Alternative format media was not readily available, only a braille brochure is obtainable. The drop-in ranger programs provide a lot of the information about the key interpretive stories identified in the Foundation Plan. These are provided in the plaza and in the VC. Information about these programs is provide in the newspaper for time and location.
- Parking: Car and RV – There are several different types of parking spaces provided including standard car spaces, 10-minute parking spaces, parking for the integrated picnic sites, RV parking, and electric charging station parking. There is an adequate number of accessible spaces in total, need to assure there is one van space for every six accessible spaces provided: *F208.2.4 Van Parking Spaces. For every six or fraction of six parking spaces required by F208.2 to comply with 502, at least one shall be a van parking space complying with 502.* Key issues found:
 - The oversized parking area does not include an accessible space.
 - The electric vehicle charging station has two accessible parking spaces with no access aisle. This is the only charging station and most visitors would need to park illegally to charge their vehicle.
 - No signage provided for the accessible parking adjacent to the visitor center
- Pedestrian routes
 - The distance from the accessible parking to the shuttle stop is excessive – 700' from the closest space, the NPS recommended maximum is 200'



- Plaza – trip planning kiosks
 - Few visitors were observed using these kiosks – most visitors were walking to the restroom and shuttle stop. There are a few built-in tactile exhibits provided including animal sculptures and a large Zion valley model (too large to touch middle of the valley).
- Restrooms
 - The existing restrooms do not meet ABAAS requirements, see TPD for deficiencies found
- Information desk
 - Accessible counters are provided and useable (clear of clutter)
 - Only a braille brochure provided for alternative formats – difficult to retrieve from the info desk
- Gift shop
 - There are several checkout stations, all accessible counters are too short to meet ABAAS requirements
- Exhibits, films, etc.
 - Minimal exhibits provided in the VC, most are exterior.
 - Monitor with film playing provides open captioning.
- Picnic Area throughout VC parking – There are 16 picnic units in this parking areas, most are single tables, three are double tables. There is one accessible single table unit adjacent to the accessible parking. ABAAS requires three accessible units, with one being a double table unit:

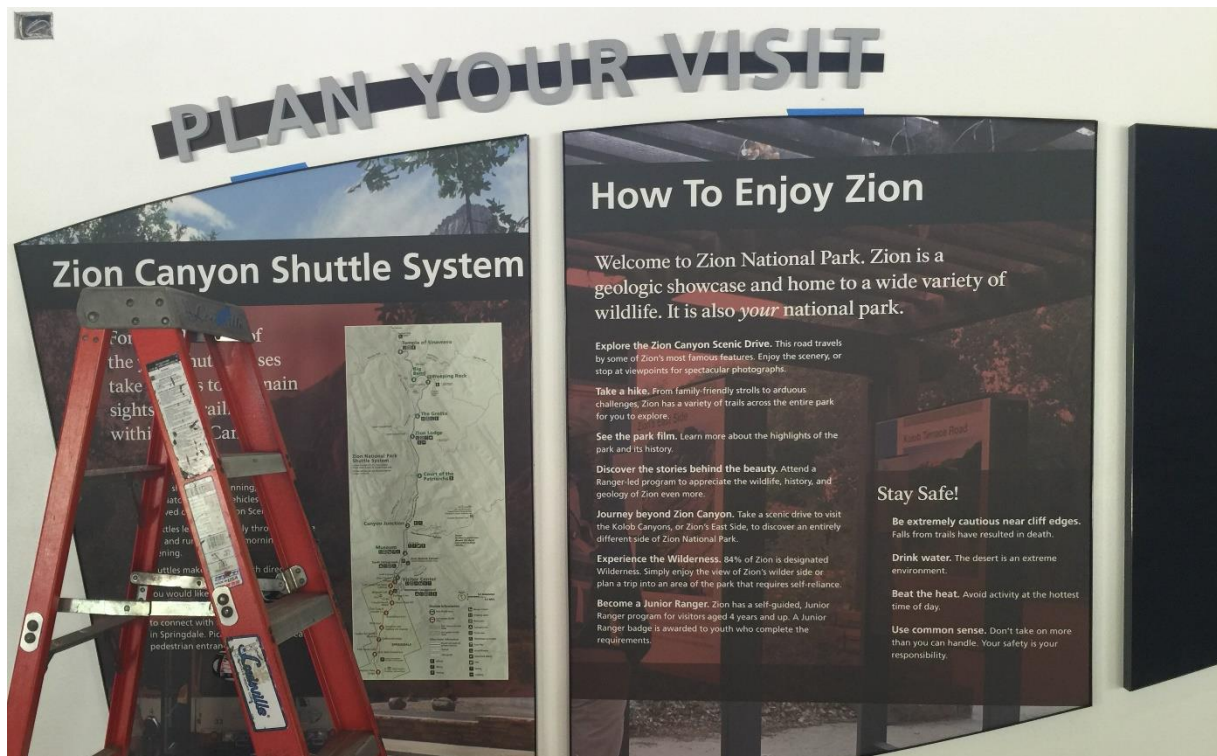
F245.2.2 Picnic Facilities with More Than Two Picnic Units. Where picnic facilities contain more than two picnic units, at least 20 percent, but not less than two, of the picnic units shall provide mobility features complying with F245.2.

Recommendations:

Interpretive Programs –

- Provide yearly accessibility training for all interpretive staff
 - Disability awareness
 - Spontaneous audio description
 - Assistive devices
 - Methods for communication
- Providing assistive listening devices for large groups (easily available to rangers, training in operation)

- Provide additional wayfinding information for the ranger drop-in programs (topics, general locations and times) to help visitors with disabilities find these programs in newspaper, temporary signage, etc.
- Provide meaningful tactile elements for the ranger drop-in locations
- Provide scheduled sign language programs for ongoing large group programs; such as once a week during the summer, with program information included in the newspaper.
- Provide alternative formats for the main publications; large print, audio guide, braille, tactile maps, etc.
- Identify accessible programs and media on website and in newspaper
- Information Desk – Have large print versions of standard information provided by rangers readily available at each station. Provide designed note paper and pen set permanently on the counter at each station to make communicating with visitors who are deaf or are hard of hearing more intuitive.
- New exhibits were being installed during final information gathering site visit in August 2016. Recommend including the accessible version – the Access Guide with this exhibit or identify where to pick it up. This might be a good guide to provide at the accessible queue for the shuttles, may have fewer walk away with visitors that won't use them.



Parking - The 10-minute parking spaces do not include an accessible space, but the existing accessible spaces are just as close to the VC and easier to find; recommend keeping all of the accessible spaces and amenities together to keep circulating through this parking lot looking for an accessible space elsewhere to a minimum. Add an accessible RV space in the oversized parking lot with same length as other spaces and width of space and access aisle the same as required for van accessible spaces. Specific recommendations for the Visitor Center area parking are included in the TPD.

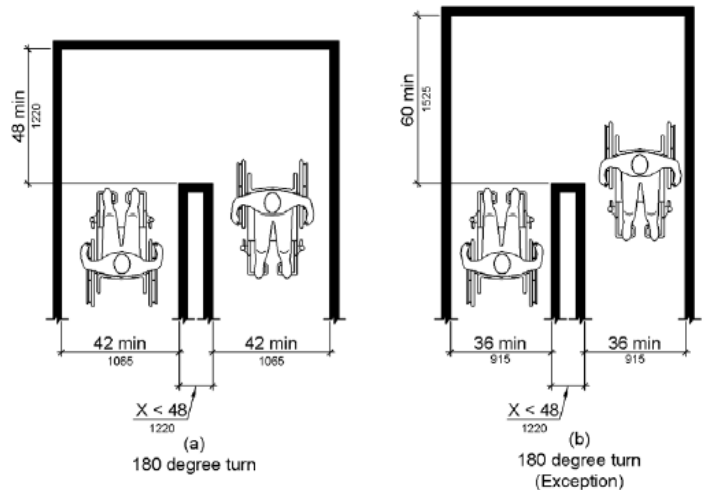
Electric Charging Station - Provide a compliant parking space and access aisle (van accessible) at the electric charging station. Sign accessible space and add a second space signed for vehicle charging use only – no accessible parking sign or pavement markings.

Pedestrian Routes – The distance from the accessible parking to the shuttle stop is excessive. Recommend regrading an accessible route from the accessible parking to the shuttle stop and visitor center – see picnic area recommendation for one option to make the accessible route shorter.

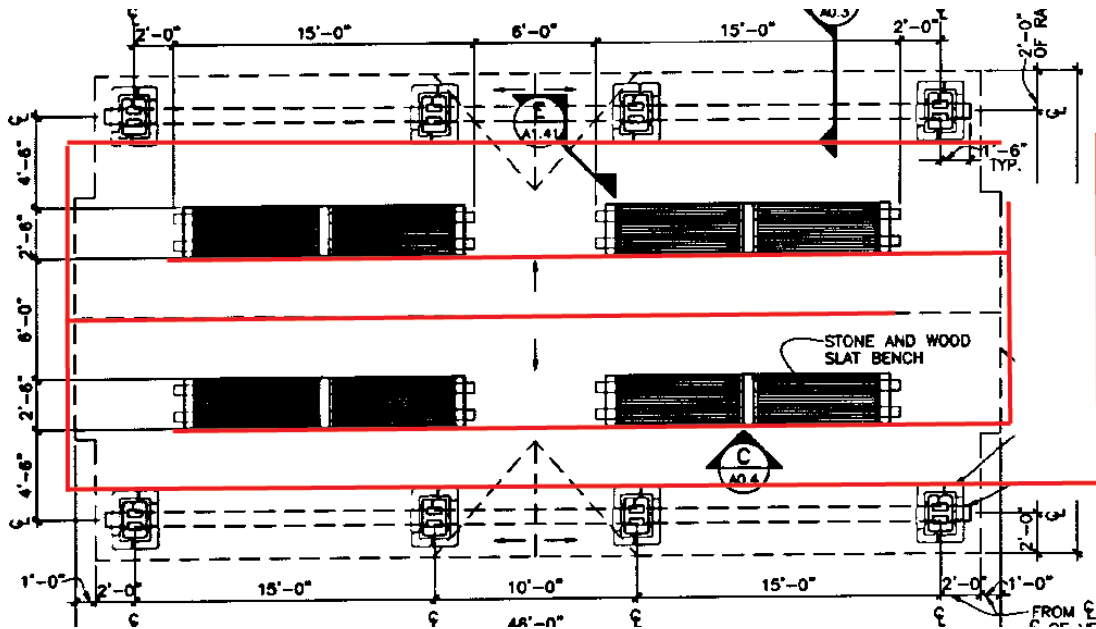
Plaza – Very few visitors were observed using the kiosks during the two data gathering trips (end of June and mid-August). Recommendations for making these areas more usable:

- Provide additional shade. The existing spacing of the shade slats is too far apart to provide shade, making these areas too hot to spend time in.
- These function as the interpretive exhibits for the VC, should include some type of outdoor cooling system (high pressure misting, ceiling fans), interactive exhibits, and ranger drop-in stations.
- Provide context for tactile exhibits, the bronze animals by themselves are sculpture, included in the flora and fauna exhibit area, they are interpretive.
- The 3d map of the valley is too large to be used by the blind. Consider making cross-sections at named locations in the valley so that you can feel the narrowing of the canyon.
- Provide a small tactile model of the valley - 2 by 3' that a person can feel both ends and understand the narrowing of the canyon and steep side walls.
- Picnic Area throughout VC parking – See Picnic Areas for recommendations.

- Consider providing timed tickets for the shuttle so that visitors don't have to stand in line for more than 10 – 15 minutes, they can learn about the park instead. Allow wheelchair, walker and cane users to go to a shaded no-wait lane beside the general queue to board as soon as possible (one wheelchair per shuttle).



- Does not appear there is adequate clear floor space to place a compliant queue line between the existing benches and the base of the stone columns. The queues need to be a minimum of 36" clear between the narrowest points along the queue (rock bases at end and middle of benches, base of columns, base of chain stanchions), need 5' clear at ends of lines to make the 180 degree turn.



- Specific structural recommendations for the Visitor Center area are included in the TPD.

Zion Human History Museum

Zion Human History Museum

From park website: *Explore the human history of Zion Canyon Indoor exhibits, orientation film, rotating art exhibit, restrooms, bookstore, and water bottle filling station. Ranger-led programs. Views of the Towers of the Virgin and Bridge Mountain. Access to the Pa'rus Trail.*

Requirements:

Programs, services and activities provided at the Human History Museum need to be accessible to people (visitors and employees) with disabilities.

Findings:

Interpretive programs and Exhibit room –

The Human History Museum is where many of the park fundamental resources and values are interpreted for visitors. The exhibits are not accessible to visitors that are blind or have low vision, no alternative formats were observed. Several locations have narrow openings that wheelchair users cannot negotiate. The large topographic model in the center of the exhibit room has sign to not touch and is too large to function as a tactile exhibit. The film shown in the auditorium is open captioned.

Ranger talk gathering space –

The outdoor seating area where ranger led programs are provided does not provide integrated wheelchair seating and visitors with mobility impairments will have a difficult time getting near the speaker.

Parking –

There is an adequate number of accessible spaces provided. The accessible parking

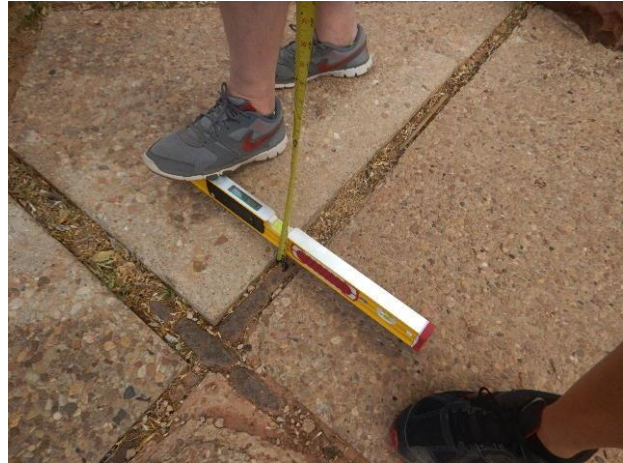


spaces and access aisles exceed the maximum slopes allowed by ABAAS (3.5 - 4.4%). A van accessible space, access aisle and sign are not provided.

Restrooms – The restrooms have many accessibility issues. These are documented with data and photographs in the TPD.

Information desk/Gift shop - The gift shop area is tight and does not provide adequate maneuvering space throughout.

Pedestrian Routes - The concrete walks and terrace use wide wood joints. The wood is deteriorating and sinking causing tripping hazards and gaps that do not meet ABAAS requirements. The concrete is spalling in several locations causing similar problems as well.



Recommendations:

Interpretive Programs –

Provide yearly accessibility training for all interpretive staff

- Disability awareness
- Spontaneous audio description
- Assistive devices
- Methods for communication
- Providing assistive listening devices for large groups (easily available to rangers, training in operation)
- Provide meaningful tactile elements integrated throughout the exhibits
- Provide scheduled sign language programs for ongoing large group programs
- Provide alternative formats for the main publications; large print, audio guide, braille, tactile maps, etc.
- Develop an audio tour of the exhibits
- Identify accessible programs and media on website and in newspaper

Pedestrian Routes – Replace wood joints in the concrete walks with a material that can be more easily maintained.

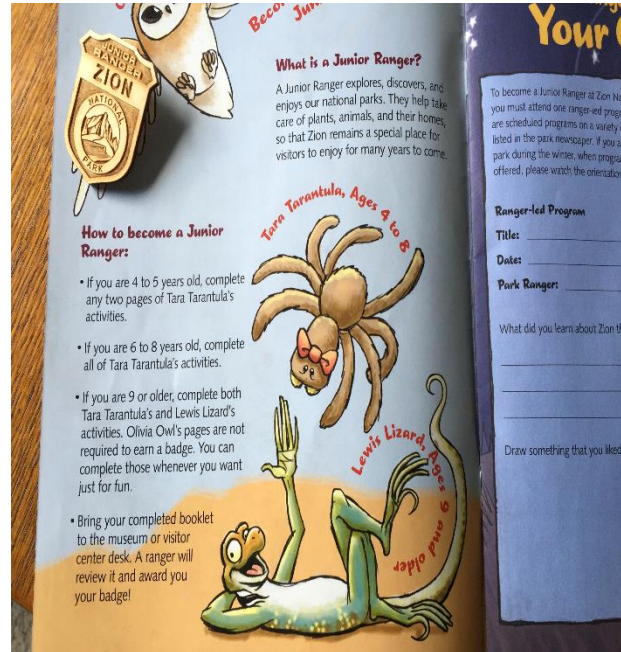
Restrooms – Restrooms will require a major remodel to meet ABAAS requirements.

Specific recommendations for the Human History Museum area are provided in the TPD.

Nature Center

From park website: The Zion Nature Center, located north of South Campground has a variety of exhibits, activities, books, and games for children and families to explore.

Nature Center Youth Programs - These programs are offered daily from Memorial Day Weekend through Labor Day. The Zion Nature Center is located next to the South Campground. The shuttle does not stop here, but it can be accessed from the Pa'rus Trail. Limited Parking is available. Programs are designed specifically for children and families, and are 30-45 minutes long.



Findings:

The Nature Center is the key facility for the Junior Ranger Program, children and family education, and family oriented ranger programs. The Junior Ranger program is difficult for children that are blind or have low vision to complete, the carved badge is beautifully crafted and tactile for all that earn it.

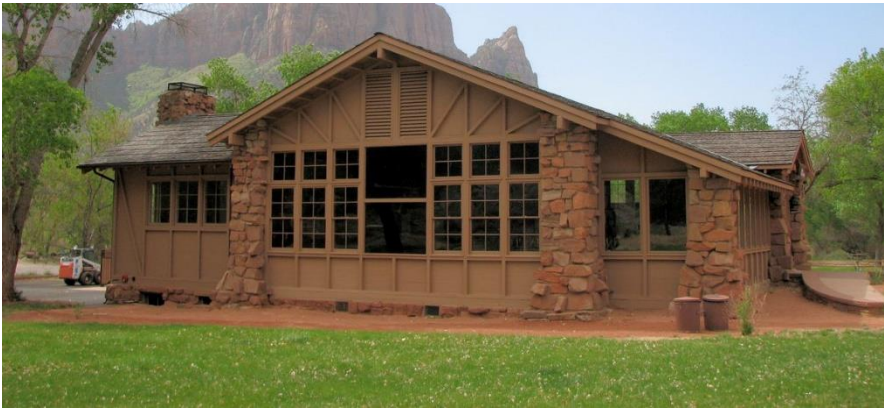
There are many interactive exhibits, several are out of reach range requirements. There are no alternative formats available for the exhibits.



Recommendations:

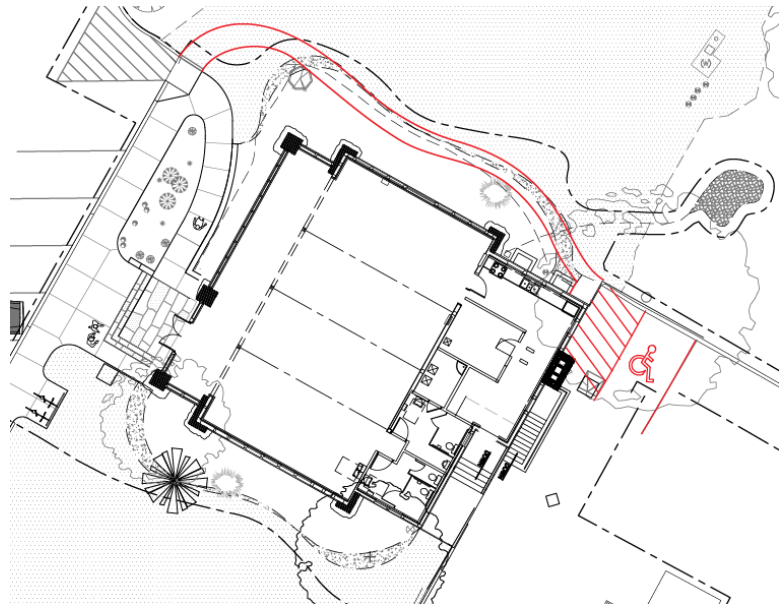
Recommend developing an alternative format for the Junior Ranger program booklet and requirements for the badge. Develop interpretive ranger training for providing inclusive programs and SOP's for assistive devices, qualified ASL interpreter, etc. Specific structural recommendations for the Nature Center area are included in the TPD.

Alternative 1 accessible route location

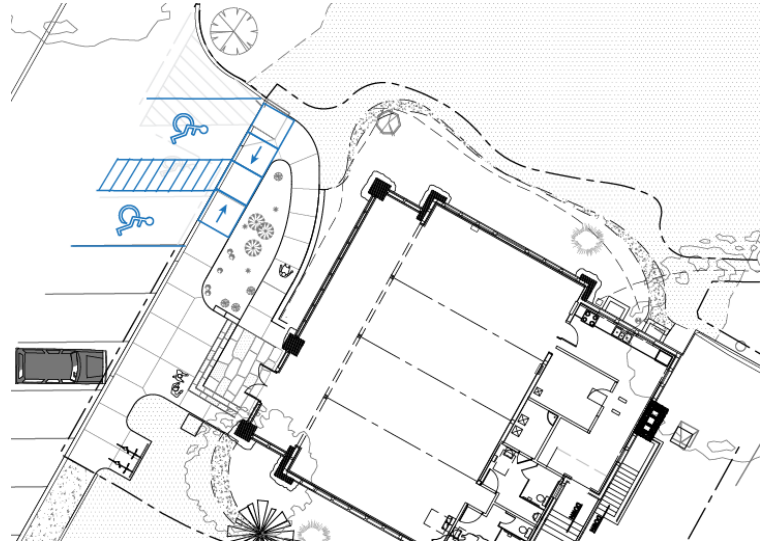


There are two parking areas for the nature center, one for visitors and one for employees. ABAAS requires accessible parking for each area. Two ways to provide this program are diagrammed below:

Alternative 1 places a van accessible parking space and access aisle in the employee lot with an accessible route to the visitor ramp at the front of the building.



Alternative 2 places both accessible parking spaces in the visitor lot per ABAAS F208.3.1 EXCEPTION 2. Parking spaces shall be permitted to be located in different parking facilities if substantially equivalent or greater accessibility is provided in terms of distance from an accessible entrance or entrances, parking fee, and user convenience.



Recommend using a flush curb and landing at walk adjacent to access aisle and ramp the walks up from there, rather than a standard curb ramp that requires a landing at the top of the curb ramp for new construction that requires a minimum 9' wide walk (for a 6" curb) at this location:

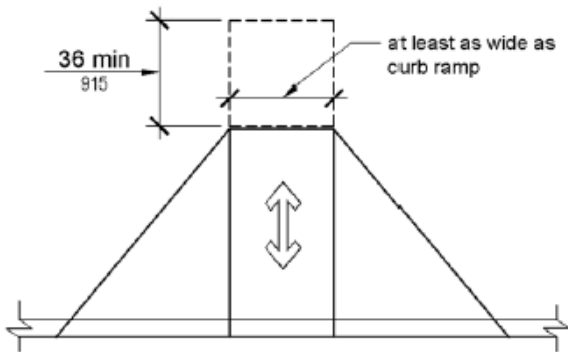


Figure 406.4 Landings at the Top of Curb Ramps

EXCEPTION: In alterations, where there is no landing at the top of curb ramps, curb ramp flares shall be provided and shall not be steeper than 1:12.

Kolob Canyons Visitor Center

From park website: Kolob Canyons Visitor Center - All guests are required to stop at the Kolob Canyons Visitor Center to show an Interagency Park Pass or pay the Zion National Park entrance fee. Wilderness Permits can be obtained here for backpacking campsites and canyoneering routes in the park. There is also a bookstore operated by the Zion Natural History Association.

Requirements:

Programs, services and activities provided at the Visitor Center need to be accessible to people (visitors and employees) with disabilities.

Findings:

Parking: There are 38 car parking spaces with two designated accessible at the visitor center (two required by ABAAS); neither space meets ABAAS requirements; excessive slope, access aisles are not provided and curb ramp is not compliant. Buses and large vehicles park in the center of the parking area, no designated accessible RV/bus spaces provided.

There is a staff parking space and accessible electric charging station parking adjacent to the VC.



Existing employee parking space and electric vehicle charging station

Restrooms: The existing restrooms do not comply with ABAAS and will require significant alterations that will reduce the number of stalls in each restroom. See the TPD for issues found.

Plaza: Much of the plaza is too steep to meet ABAAS requirements (4 to 7%) – ABAAS requires 2.08% max in all directions for plazas.

Entrance: The entrance doors to the VC are heavy to open, greatly exceed the 5lbs. allowed for interior doors (exterior doors are not required to meet the 5 lbs. opening force, however, Section 504 requires access into the building.

Information desk and Association counter:

Neither counter provides an accessible counter height for wheelchair users. There were no alternative formats available at the counter except for a braille brochure.

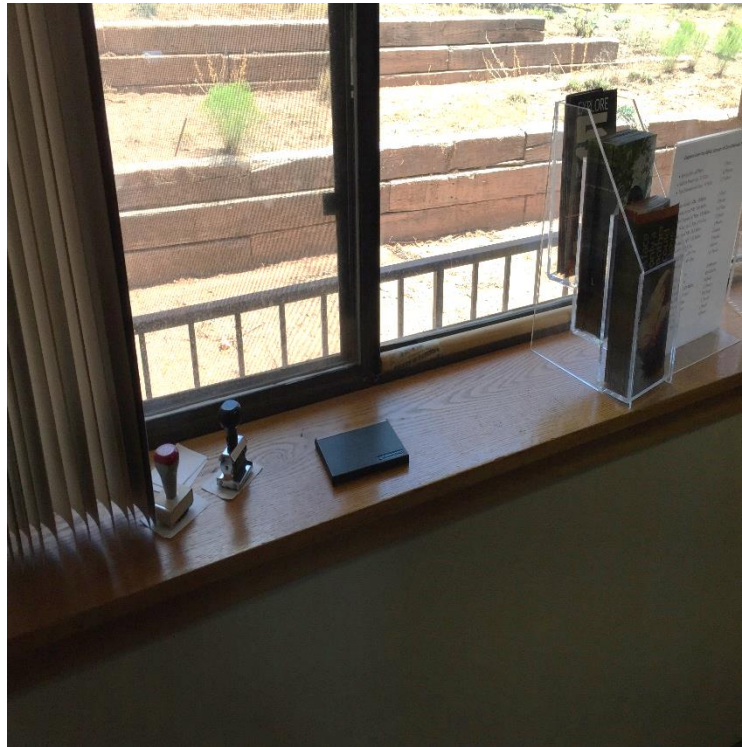
Exhibits:

This space is very tight to provide information desk, exhibits and gift shop functions. The exhibits are not accessible to visitors that are blind or have low vision. The passport stamping station is located on the window sill that does not meet ABAAS requirements for approach or height.

The gift shop counter and front of counter are filled with product, making the transaction counter inaccessible.

Employee space:

The offices are located on two levels, the VC level and the basement. The breakroom is located in the basement and is not accessible to employees that use wheelchairs or other mobility devices.



Recommendations:

Parking: Recommend making two accessible car spaces with a compliant access aisle and accessible route to VC. Add an accessible RV/bus space at the current staff parking space (move employee space to central island parking). Provide a compliant parking space and access aisle (van accessible) at the electric charging space, but do not put the ASI on the pavement or sign this space – This is the only charging station and needs to be useable by all visitors and signing would make it illegal for most visitors to use.



Restrooms: Recommend adding compliant accessible stalls to the men's and women's restrooms as an addition to this building or adding unisex toilets as a separate building adjacent to the VC. There is not adequate space in the existing restrooms to make them compliant without losing one stall in each restroom. See the TPD for specific issues with these restrooms.

Plaza: Provide a compliant accessible route from the accessible parking spaces to waysides, restrooms and building entrance.

Entrance: Recommend adding power assist door openers on these doors to allow useable access into building.

Information and gift store counters: Provide accessible counter height for parallel or perpendicular approach to each counter, include an accessible employee workspace behind each counter.

Exhibits: Provide accessible exhibits (interior and exterior) that are accessible, include alternative formats and tactile elements to interpret the key stories told here.

Employee Space: Offices are located on both floors; the basement does not need to be made accessible as long as an equivalent breakroom space with refrigerator and microwave is provided on the main level.

Specific structural recommendations for the Kolob Canyon Visitor Center area are included in the TPD.

Campgrounds

Requirements:

ABAAS Scoping requirements for Campgrounds:

F244.2 Camping Units with Mobility Features. Camping facilities shall provide camping units with mobility features complying with F244.2 in accordance with Table F244.2. Where a camping facility provides different types of camping units, Table F244.2 shall apply to each type of camping unit provided.

Table F244.2 Camping Units with Mobility Features

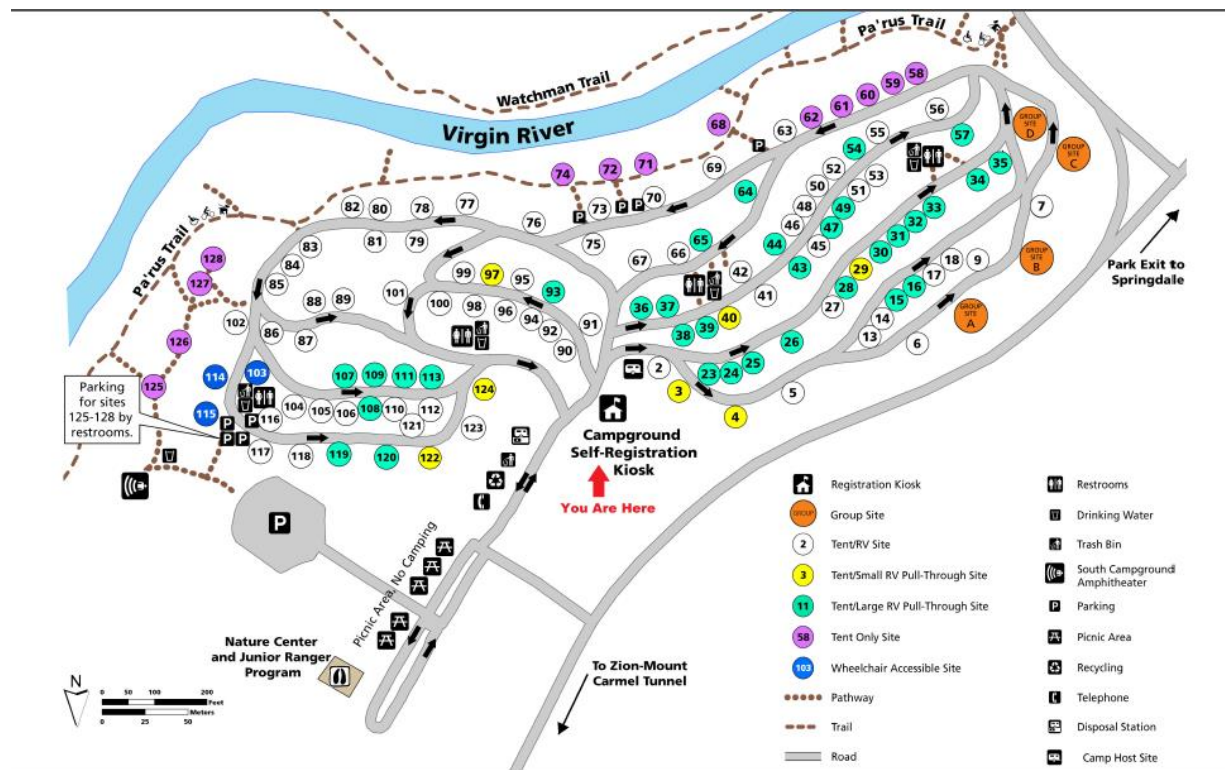
<i>Total Number of Camping Units Provided in Camping Facility</i>	<i>Minimum Number of Camping Units with Mobility Features Required</i>
<i>1</i>	<i>1</i>
<i>2 to 25</i>	<i>2</i>
<i>26 to 50</i>	<i>3</i>
<i>51 to 75</i>	<i>4</i>
<i>76 to 100</i>	<i>5</i>
<i>101 to 150</i>	<i>7</i>
<i>151 to 200</i>	<i>8</i>
<i>201 and over</i>	<i>8, plus 2 percent of the number over 200</i>

Advisory F244.2 Camping Units with Mobility Features. Camping units for recreational vehicles only, camping units for tent camping only, and camping units with camp shelters are different types of camping units.

Camping units with mobility features are not required to be identified by signs. Entities should provide information on the location of camping units with mobility features on websites, in brochures, and at bulletin boards or information kiosks at the camping facility. Where entities operate reservation systems for camping units or assign camping units upon arrival, entities should establish policies to ensure that camping units with mobility features are available for individuals with disabilities until all the camping units are occupied.

F244.2.1 Alterations and Additions. Where camping units are altered or added, the requirements of F244.2 shall apply only to the camping units that are altered or added until the number of camping units with mobility features complies with the minimum number required in Table F244.2. F244.2.2 Dispersion. Camping units required to provide mobility features complying with F244.2 shall provide choices of camping units comparable to, and integrated with, those available to others.

South Campground



Findings:

From park website: South Campground is located ½ mile from the South Entrance. There are 117 campsites (including three wheelchair accessible) available first-come, first-served. For the 2016 season, 4 group sites were added that accommodate 7-15 people, available first-come, first-served.

The accessible sites do not meet ABAAS scoping or technical requirements and are not readily usable by people with mobility disabilities. The group sites, walk-in sites and campground host sites are not accessible.

The South Campground Amphitheater is not accessible for wheelchair users, there is no route to the stage or compliant integrated seating. Availability of assistive listening devices was not observed.



Recommendations:

South Campground has many of the same types of facilities as Watchman Campground – the main program provided here, not available at Watchman Campground, is that South Campground is a non-reservation campground. Zion should conduct a Transition Plan of South Campground and Amphitheater to have MTC provide recommendations and physical solutions to make these programs accessible.

To meet ABAAS requirements, South Campground needs a minimum of 7 accessible campsites distributed among the types of sites available: back-in and pull-through tent/RV; walk-in tent; river view sites; campground host site; and group site. Accessible sites need to be dispersed throughout the campground, the three accessible sites currently provided need to be redistributed throughout the campground.



Accessible sites need to have outdoor recreation access routes connecting to campground amenities including restrooms, water stations and trash collection. There is only one accessible unisex restroom, may need to add additional to meet ABAAS dispersion requirements.

Watchman Campground

Findings:

From park website: *Watchman Campground is located ¼ mile from the South Entrance. Tent and electric campsites are available year-round and group campsites are available by reservation from March through October. There are 176 regular sites, 2 wheelchair accessible sites and 7 group sites.*

There are currently 2 accessible back-in RV sites ([A 16HC](#), [A 19HC](#)) for the 182 site Watchman Campground per the Recreation.gov reservation site, both sites are in a loop to be closed in October 2016 for construction work (asphalt overlay).

ABAAS requires a minimum of 8 dispersed accessible sites total for alterations to a 182 site campground, however, for new construction, this campground would need 14 accessible sites dispersed among the different types of sites provided:

1. 85 tent only sites (\$20/nt.) – requires 5 accessible spaces per ABAAS for new

- construction
2. 84 back-in RV sites (12 with river view) (\$30/nt.) – Requires 5 accessible sites for new construction
 3. 6 pull through RV sites (4 with river view) (\$30/nt.) – requires 2 accessible sites for new construction
 4. 7 Group sites) (\$50 /nt.) – requires 2 accessible sites for new construction
 5. 2 Campground host sites – Section 504 program access requires 1 host site to be accessible, all host sites need to be accessible to visitors (campers)

Accessible sites need to have outdoor recreation access routes connecting to campground amenities including restrooms, water stations, gray water disposal drain, trash and recycling, and amphitheater. There are several signed river access trails in the campground, none meet the requirements for a beach access route. Beach and river access is required per ABAAS.

The amphitheater does not have usable accessible wheelchair seating areas (steep slopes and inadequate clear space) or access to the stage.

Recommendations:

Program access - Section 504 of the Rehabilitation Act requires that all programs are accessible when viewed in their entirety. Each of these different types of campsites is a program. These sites need to be dispersed among all of the loops.

Accessible campsites - The team met on-site with the park landscape architect and determined which of the existing sites met these requirements and required the lowest initial cost to implement. Data was collected for these sites and is included in the TPD. To provide an equivalent camping experience, MTC recommends making the following sites ABAAS compliant:

Sites recommended to be made accessible:

- A 8, back-in RV site
- A 16, back-in RV site
- B 44, pull-through RV site
- B 54, pull-through RV site
- B 57, back-in RV site
- C 14, tent only site
- C 16, tent only site
- D 11, tent only site
- D 16, tent only site
- D 22, tent only site
- E 3, group tent only site
- E 6, group tent only site
- F 7, walk-in tent site

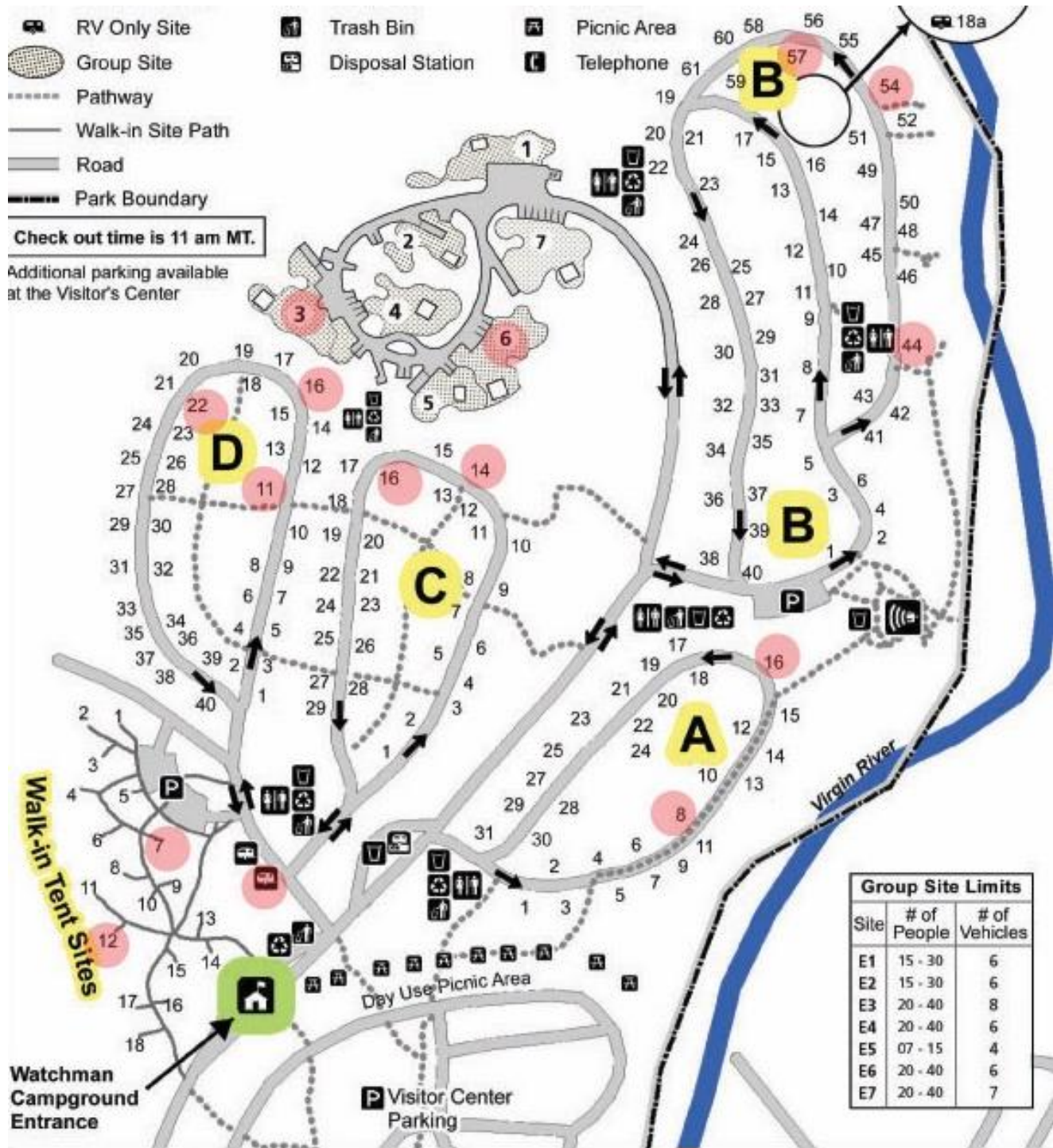
- F 12, walk-in tent site
- Camp Host Site, back-in RV site

Existing designated accessible site - A 19HC, would require site clearing, grading and pavement work to meet ABAAS requirements. Recommend removing sign and designation on websites and using other campsites identified to be made accessible. Recommended sites to be made accessible are shaded in the plan and detailed in the TPD. The alterations to the loop being closed this fall should include the alterations included in the TPD for this loop.

Amphitheater - The amphitheater will require removing the bottom and top row of benches, paved surface and pedestrian routes to these areas; and regrading to get these rows level for dispersed accessible seating with companion seating allowing users to sit shoulder to shoulder (an additional 12" behind these benches is needed to meet this requirement). In addition, the outdoor access routes to the amphitheater seating and stage will need to be regraded to meet ABAAS requirements.

River Access - Add a compliant beach access route, recommended access point across from site B57 is included in the TPD.





Legend

Watchman Campground Proposed Accessible Sites – 57

Lava Point Campground

From park website: *This campground is typically open June through October, as weather allows. There are 6 primitive campsites available first-come, first-served, pit toilets, and trash cans, but no water. Vehicles longer than 19 feet are not permitted on the road to the campground. There is no charge for camping.*



Findings:

The 6 primitive campsites are not accessible for people with mobility impairments, there is no compliant outdoor recreation access route (ORAR) to the vault toilets, the parking at the comfort station does not meet ABAAS requirements, the toilet rooms will require minimal alterations to meet ABAAS. There is a trail to an overlook that begins in this campground that should be made accessible. This campground will require two accessible sites to meet ABAAS requirements:



Table F244.2 Camping Units with Mobility Features

Total Number of Camping Units Provided in Camping Facility	Minimum Number of Camping Units with Mobility Features Required
1	1
2 to 25	2
26 to 50	3
51 to 75	4
76 to 100	5
101 to 150	7
151 to 200	8
201 and over	8, plus 2 percent of the number over 200

Recommendations:

Lava Point Campground is the only primitive campground in the park, very different from the camping experiences available at South or Watchman Campgrounds. Zion should conduct an

existing facility evaluation and Transition Plan for Lava Point Campground to make programs provided there accessible. The Lava Point campground programs identified during the site visit in August 2016 include: 6 back-in RV/tent sites with picnic table, fire ring and tent pad; vault toilet with parking, trash and recycling; registration and regulation/notice board; and trail to overlook. While reviewing the campground, two sites appeared to be easily altered to meet accessibility standards with campground road as ORAR to comfort station. Trail begins at one of these sites:



Picnic Areas

Requirements:

ABAAS Scoping requirements for Picnic Areas:

F245 Picnic Facilities

F245.1 General. Picnic facilities, other than picnic facilities on trails, shall comply with F245.

Advisory F245.1 General. Picnic facilities on trails are addressed in F247.4.2.

F245.2 Picnic Units with Mobility Features. Picnic facilities shall provide picnic units with mobility features in accordance with F245.2.

Advisory F245.2 Picnic Units with Mobility Features. Picnic units with mobility features are not required to be identified by signs. Entities should provide information on the location of picnic units with mobility features on websites, in brochures, and at bulletin boards or information kiosks at the picnic facility.

F245.2.1 Picnic Facilities with Two or Fewer Picnic Units. Where picnic facilities contain two or fewer picnic units, each picnic unit shall provide mobility features complying with F245.2.

F245.2.2 Picnic Facilities with More Than Two Picnic Units. Where picnic facilities contain more than two picnic units, at least 20 percent, but not less than two, of the picnic units shall provide mobility features complying with F245.2.

F245.2.3 Alterations and Additions. Where picnic units are altered or added, the requirements of F245.2 shall apply only to the picnic units that are altered or added until the number of picnic units with mobility features complies with the minimum number required in F245.2.1 or F245.2.2.

EXCEPTION: Where an entity is implementing a transition plan for program accessibility developed pursuant to regulations issued under section 504 of the Rehabilitation Act that designates specific picnic units to provide mobility features complying with F245.2, the entity shall not be required to comply with F245.2 when altering individual elements within picnic units that are not designated to provide mobility features complying with F245.2.

Advisory F245.2.3 Alterations and Additions Exception. When all the elements within a picnic unit are altered, the altered picnic unit is required to comply with F245.2 unless the minimum number of picnic units with mobility features required in F245.2.1 or F245.2.2 is provided.

F245.2.4 Dispersion. Picnic units required to provide mobility features complying with F245.2 shall provide choices of picnic units comparable to, and integrated with, those available to others.

Program Requirement Findings:

The picnic areas in Zion are spread out throughout the park and are associated with adjacent programs and facilities. Providing picnicking at only a few of these areas would not meet the equivalent experience requirement in Section 504. All picnic areas in the park need to meet the scoping and technical requirements of ABAAS. Findings:

Visitor Center Picnic Area

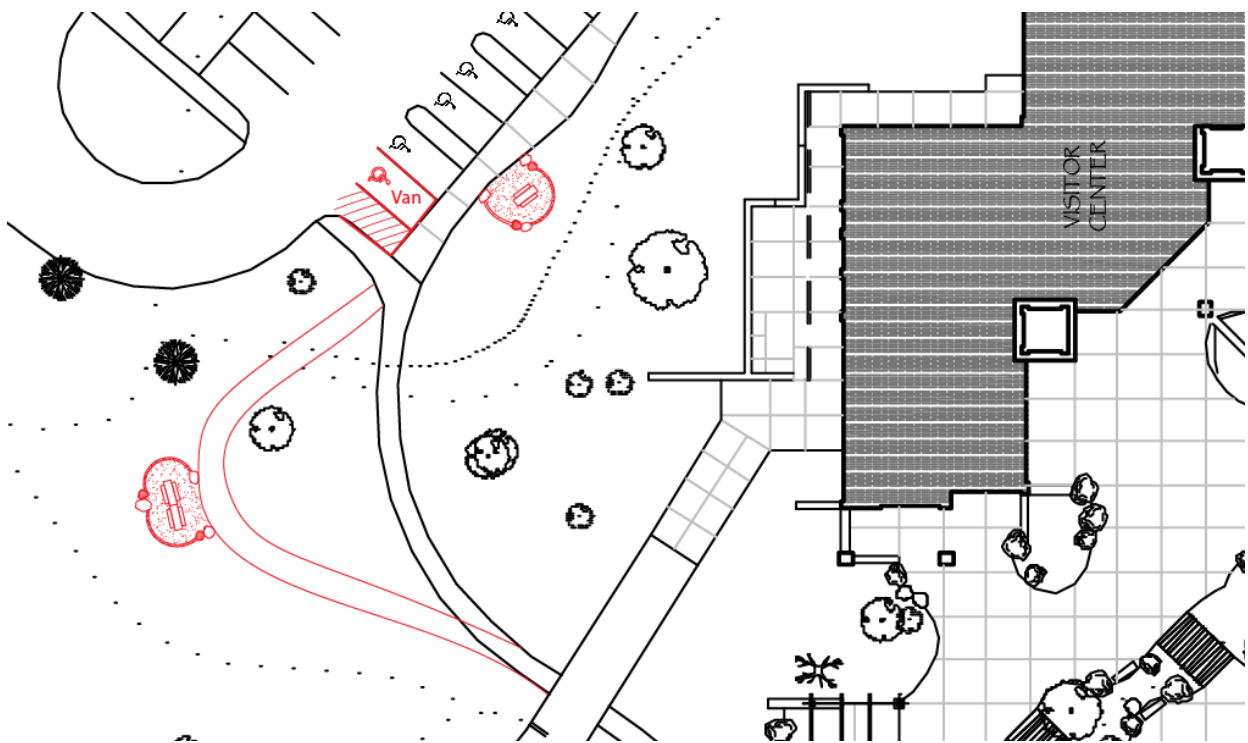
From park website: Located .3 miles from the South Entrance on the outer edge of the visitor center parking lot. Picnic sites are level but unpaved. Most tables are extended. Accessible unisex restroom is available near the visitor center.

Findings:

Picnic tables are dispersed around the Visitor Center parking area. There is one accessible table adjacent to the accessible parking. There are individual picnic units and double picnic units provided around the parking area.

Recommendations:

This is an extremely busy parking area and the picnic tables are located in the parking islands throughout. Recommend keeping the accessible picnic tables adjacent to the accessible parking spaces rather than dispersing the picnic table throughout the parking area. It would be very difficult to provide directions to an accessible parking space and picnic table in another location of the parking area, when wayfinding to the VC, shuttles, restrooms, etc. is complicated already. There are 16 picnic units provided, with one accessible. Need to provide a minimum of 3 accessible picnic units (two single table and one double table unit) to meet ABAAS requirements. Other specific recommendations for this area are included in the TPD. One solution to provide these units:



Grotto Picnic Area

From park website: Shaded picnic area among cottonwood trees Restrooms, picnic area, and water. Views of the Virgin River and Angels Landing. Access to The Grotto Trail, Kayenta Trail, and West Rim Trail. Located 3.5 miles up the Zion Canyon Scenic Drive and accessible only by shuttle bus from April through October. Reserved parking spaces in the off months. Picnic grounds are level but unpaved. Accessible, unisex bathroom.

Findings:

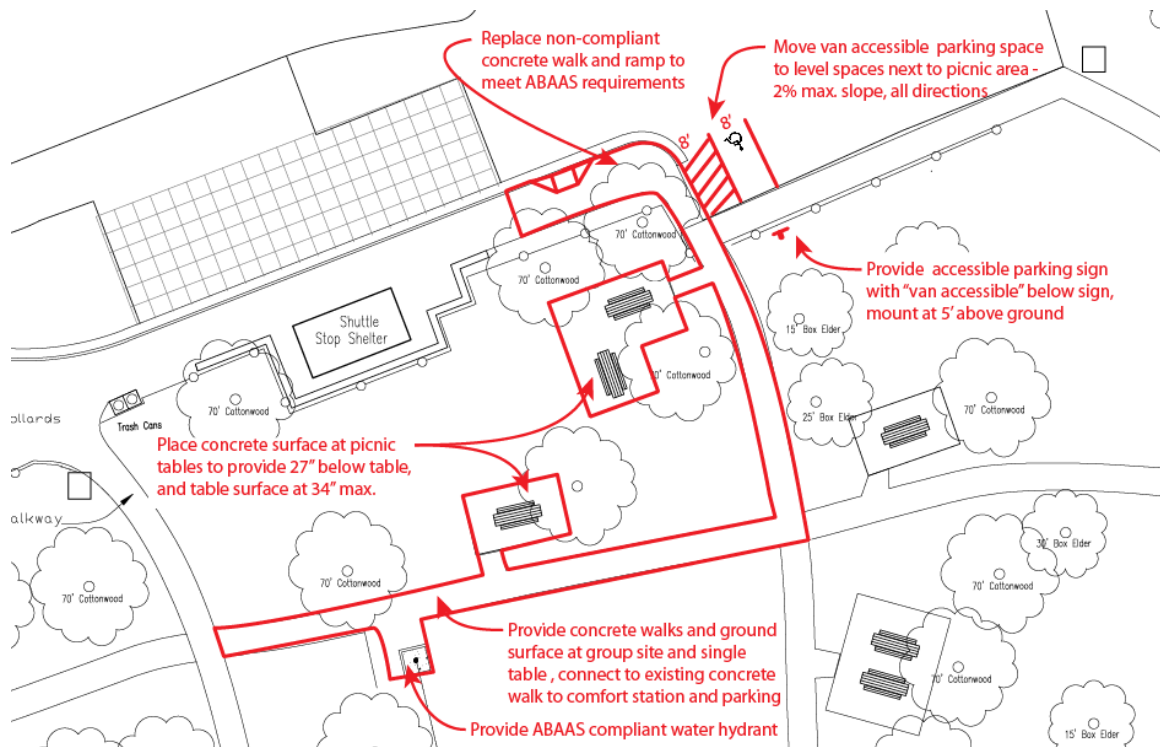
Picnic Units - There are two types of picnic units here: single table, and group site with 2 or more tables. The picnic table posts are embedded which causes table height and knee clearance to vary between the tables. Need to assure 27" clear knee space and maximum table height of 34". Maintaining these table requirements and firm, stable ground surface of pedestrian routes will require weekly, scheduled maintenance.



Restrooms – The accessible unisex restroom does not meet ABAAS requirements. The deficiencies and recommendations are documented with data and photographs in the TPD.

Recommendations:

Recommend replacing crusher fines surface material with concrete to assure accessible tables remain accessible to wheelchair users. Move the (non-compliant) accessible parking space to level spaces next to picnic area - 2% max. slope, all directions, recommend replacing ramp and concrete walk to the new accessible space with a compliant walk. The existing unisex accessible restroom does not comply with ABAAS requirements. See specific recommendations for this area in the TPD.



Kolob Canyons Picnic Area

From park website: *Located at the end of the 5-mile scenic drive. Restrooms accessible. Tables located up steep, unpaved path.*

Findings: This picnic area is not accessible to people with mobility impairments. The route to the picnic area exceeds slopes for outdoor recreation routes or trails. There is a picnic table in the center of the parking area island, the table is not accessible and there is a full height curb surrounding the island with no curb cut.

Recommendations: Recommend making the picnic table in the island of the parking area accessible; add a curb ramp, ORAR from accessible parking space (van accessible) and access aisle to picnic table, and adequate clear space around compliant table. If natural shade does not cover this table, recommend adding a shade structure to be equivalent to the natural shade provided at the picnic area on the hillside. See the TPD for additional recommendations.

Nature Center Picnic Area

Findings: This picnic area is stretched out in two islands adjacent to the Nature Center. There is no designated accessible parking or ORAR for the picnic facility on the south island. The full height curb is not accessible to people with mobility impairments.

Recommendations:



Recommend adding an accessible van parking space, access aisle, curb ramp and ORAR to two picnic units (a single table and a double table) in the area circled on the plan. Provide an ORAR to the lawn area and accessible tables on the level areas of the lawn adjacent to the nature center – these are movable tables; need to provide an SOP for placement of tables by maintenance crew to assure accessibility is maintained following mowing operations and movement by visitors. The accessible parking space for the nature center will provide compliant

parking for this picnic facility. (see parking under the Nature Center review in this document for alterations required)



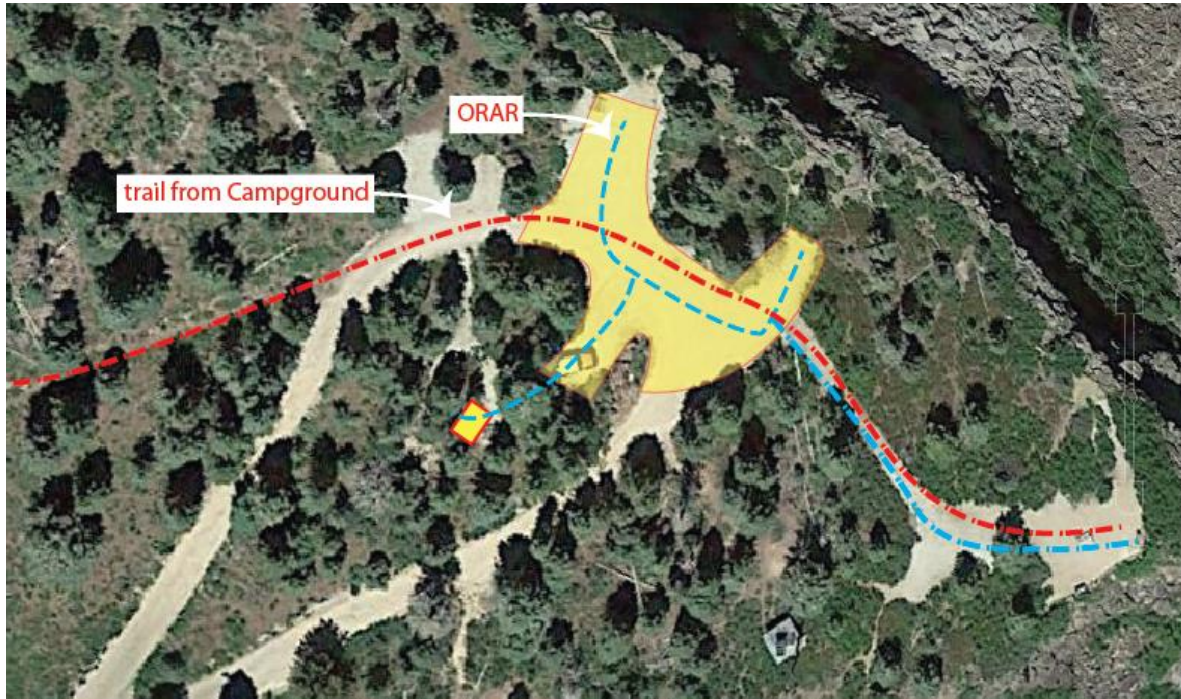
Other recommendations for this area are included in the TPD.

Lava Point Picnic Area and Overlook



Requirements:

Findings: The Lava Point Picnic Area provides five picnic sites. Two are required to be accessible per ABAAS. The picnic area includes a vault toilet and overlook parking and trail to overlook, and trail from the Lava Point Campground. The overlook needs to meet ABAAS requirements for viewing areas. This picnic area is not accessible to people with mobility impairments. The ground surface material is not firm and stable; picnic tables and sites are not accessible. This picnic area is not included in the park newspaper or on the website.



Recommendations: Recommend making two picnic sites accessible, accessible parking at comfort station or overlook, with accessible pedestrian routes connecting trail from campground, picnic sites, vault toilet and overlook. Include information in newspaper and on park website with other picnic areas. Recommend completing SETP for this area.

Dining and Lodging

Zion Lodge

From the park website: *Three miles north on the Zion Canyon Scenic Drive. Open year-round. Motel rooms, cabins, and suites available.*

Requirements: All programs provided at the lodge (visitor, NPS and concession employees) are required to be accessible per Section 504 of the Rehabilitation Act

Findings: The lodge provides many varied programs. Findings are listed by program:

- **Lodging**
 - Motel rooms – All accessible motel rooms are located on the first floor, adjacent to each other in one of the two motel buildings. ABAAS requires that lodging units be dispersed
 - Motel suites. – All suites are located on an inaccessible floor, accessible suite is not provided, ABAAS requires all room types to be accessible.
 - Cabins- One cabin is accessible, ABAAS requires a minimum of two accessible cabins.
- **Dining**
 - Red Rock Grill Dining Room and outdoor deck dining at Zion Lodge – an elevator is provided to access the dining room. The elevator is difficult to find, no signage to direct visitors.
 - Castle Dome Cafe at Zion Lodge
- **Seating Areas**
 - Interior – the seating areas in the lobby are tight conversation groups with movable rugs in the center. Accessible wheelchair space out of circulation routes is not provided.
 - Exterior – The fixed benches around the lawn in front of the lodge do not provide wheelchair seating space beside benches.
- **Services**
 - Front Desk – the front desk has an accessible counter on the side of the space, not visible from front of counter. Alternative format lodging/dining information is not provided.
 - Concierge – there is no accessible counter at this location
 - Restrooms – Restrooms in the lobby do not have an ABAAS compliant stall (inadequate clear space adjacent to toilet for side transfer).



- Business Center – the business center is a standing counter with computer and printer in the cabinet below in a narrow alcove in the lobby with ATM opposite at the other end of alcove. There is no accessible counter, computer, printer, or ATM available.



- After hours' door bell – Lobby doors are locked at night and doorbell button is located behind chairs and above reach range for wheelchair users.
- Gift Shop – there is no accessible counter in the gift shop
- Auditorium – the door is not accessible, no signage for assistive listening devices, movable furnishings rely on each setup to meet requirements, no standard setup floorplans were observed.
- Parking and pedestrian routes
 - Lodge Registration and Cafe parking area – This parking area adjacent to the shuttle stop provides two programs; signed 20-minute registration parking on one side of island and unsigned, longer term parking on the other side. Both accessible parking spaces are on the 20- minute parking side and do not provide the shortest accessible route to the Cafe/Lodge.
 - Guest lodging parking – Inadequate number of accessible parking spaces.
 - Curb ramps – All curb ramps in this area do not comply with ABAAS requirements.
- Employee spaces and programs – Employee spaces were not included in this SETP unless they are part of visitor programs as well; these are covered under the visitor programs.

Recommendations:

See the Transition Plan Database for deficiencies and recommendations to make the programs provided in this area accessible to visitors with disabilities. Recommend having all renovation plans reviewed by an accessibility specialist to assure changes meet requirements for facilities on federal properties (ABAAS, not ADA requirements) Highlighted program recommendations:

Lodging – Recommend providing additional information about the accessible rooms available and services provided, website states there are “*Physically disabled services – hearing impaired services*” - not sure what this means. Restrooms in the lodging rooms do not meet minimum requirements for ABAAS and tight clearances will make them difficult to use by wheelchair users.

Recommend including a site plan and floorplans on the reservation website to provide adequate information to determine if room will function for the visitor (include now and after renovating to meet ABAAS). Provide specific services that are provided.

Recommend conducting an SETP of the concession website and reservation system, and training for the reservation system employees in providing services to people with disabilities.



Zion Lodge

Reservations

Services & Amenities

Group Events

MAKE THE MOST OF YOUR STAY

At Zion Lodge, we pride ourselves in creating an exceptional experience by providing warm, personalized service and anticipating your needs. We offer a wide variety of services and outdoor activities to further add value to our guest's experience, as well as to ensure a memorable and comfortable stay in the heart of Zion National Park. The following guest services and in-room amenities are available during your stay.

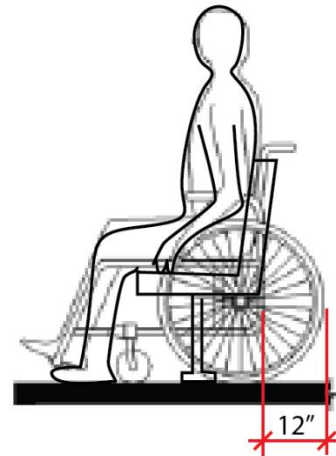
Zion In-Room Amenities

Zion Lodge Services

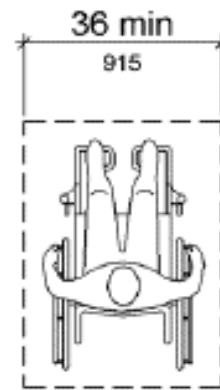
- » Red Rock Grill dining room is open daily, year-round, serving breakfast, lunch and dinner. 6:30 a.m. – 10:00 p.m. (hours vary seasonally). Reservations for dinner are highly recommended. For reservations call [435.772.7760](tel:435-772-7760). Casual attire.
- » Banquet facilities (limited)
- » Castle Dome Café (seasonal)
- » Gift shop
- » 24-hour front desk
- » Complimentary internet kiosk in the lobby.
- » Free parking/self parking
- » Bus, truck and RV parking
- » Physically disabled services – hearing impaired services
- » One accessible cabin with roll-in shower
- » Four accessible hotel rooms (two with grab bars, two with roll-in showers)
- » Guest laundry facilities are located in nearby Springdale
- » Medical facilities are located in nearby Springdale
- » Children under age 16 stay free when utilizing existing bedding and sharing a room with an adult
- » Immediate access to nature preserves and hiking trails
- » Horseback riding tours can be arranged

- Motels – All of the rooms in the two motel buildings provide similar views and other amenities. Providing the required number of accessible units on an accessible floor of one of these units should be considered equivalent access to this program. Two different types of units are provided:
 - Motel rooms – Recommend dispersing the motel rooms throughout the first floor of the accessible motel building including the types of rooms available to other guests.
 - Motel suites – Recommend making an accessible suite on the first floor of the accessible motel building (requires eliminating a storage room on this floor).
- Cabins – Provide two accessible cabins on accessible routes to provide the scoping required by ABAAS.
- Other deficiencies and recommendations in the TPD.
- Dining – Provide yearly employee training in serving people with disabilities.
- Seating Areas
 - Interior- recommend providing staff training and an SOP for placement of the moveable furniture to assure an accessible space is available out of pedestrian routes. If lighting is available for other seats, provide a wheelchair space with lighting as well.

- Exterior – pave a level landing (that extends one foot beyond bench – to allow wheelchair user to sit shoulder to shoulder with companion on bench) adjacent to several of the fixed benches around the lawn area. Provide training and SOP for placement of rocking chairs on porch to integrate wheelchair seating and clear maneuvering space.



Typical additional pavement to add at existing benches:



(a)
single space



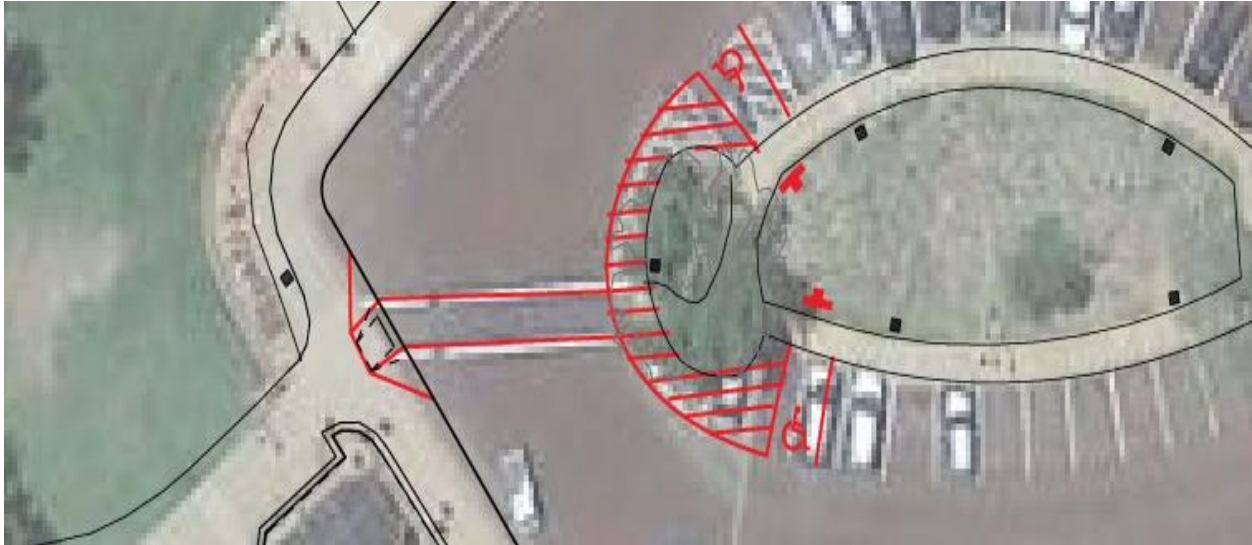
Recommended locations for wheelchair spaces (good for strollers as well):



- Services
 - Front Desk – Provide accessibility training for staff to direct visitors to accessible counter and general yearly training on serving people with disabilities. Provide alternative format lodging information (tactile map of lodging area) to aid wayfinding.
 - Concierge – provide an accessible counter at this location
 - Restrooms – Recommend removing sink and mirror to provide required clear space next to toilet in the accessible stalls in lobby restrooms. See TPD for additional deficiencies in restrooms that need to be addressed.
 - Business Center – the alcove is too tight to include these programs, recommend modifying space, removing wing walls and making an accessible business center in this space.
 - After hours’ door bell – move to an accessible location and sign.
- Gift Shop – provide accessible counters in the gift shop
- Auditorium – provide assistive listening devices and sign their availability. Provide staff training and SOP for setting up room to be accessible for any program, banquet, or meeting taking place here.



- Parking and pedestrian routes
 - There are many issues with the parking areas in the Lodge area, see the TPD for specific deficiencies and recommendations.
 - Lodge Registration and Cafe parking area – Recommend placing a van accessible parking space on each side of the island with striped access route to compliant curb ramp at cafe:



- Open Air Tram



Findings: The tram is accessible, was not in good working order when evaluated. There is no walker/wheelchair storage near the loading area.

Recommendations: Recommend providing yearly training for staff in ramp use and providing services to visitors with disabilities. Provide seating and wheelchair storage at the loading/unloading area. Provide accessibility information on website and in park newspaper.

Employee spaces and programs – Recommend conducting an SETP for concessions.

Park Entrances

Requirements: The entrance stations need to be accessible for visitors and employees with disabilities per Section 504 and ABAAS.

Findings: The stations are not accessible for employees.

Recommendations: The transition plan for the East Entrance station with deficiencies and recommendations are included in the TPD. Recommend completing the SETP for the South entrance station.

Entrance Signs

One of the key experiences in national parks is the photo-op at the iconic entrance signs. This experience needs to be accessible to all visitors. Each sign is unique; visitors may only go past one sign; all need to be accessible to meet this program.

Findings: The pedestrian entrance sign provides access to this program; all road-side signs are inaccessible. Issues: no compliant van accessible parking space, access aisle or accessible route to signs.

Recommendations: Provide accessible parking and an accessible route to the sign with clear space at sign for maneuvering.



South Entrance sign and parking



South Pedestrian Entrance Sign



East Entrance Sign and parking



Kolob Canyons Entrance Sign and parking

Shuttle Vehicles and Facilities

Shuttle Vehicles:

Findings and Recommendations:

- The front car of the two-car shuttles is accessible with ramps at the driver's door, making this system functional for most visitors with mobility impairments.
- The audio interpretive program provided on the shuttles is not provided in alternative formats; recommend providing a written transcript provided on the shuttles, could also be a downloadable app that functions without cell phone service or Wifi.
- There is a weight restriction for wheelchairs; these visitors can receive a pass to drive their own vehicle into the canyon. Provide information on the website accessibility page about shuttle restrictions for wheelchair users.
- The shuttle ventilation system functions well in most seats, recommend adding a note to website information about the shuttles that there is no air conditioning and that seats in the middle to rear of the bus are cooler from the windows and roof ventilation system for visitors with temperature sensitivities
- The shuttle windows do not open wider than 6" making it difficult for visitors to see and photograph the canyon. Visitors need to purchase tickets for the open-air tram to have clear views. Recommend when shuttles are replaced to provide windows with clear views to make this program accessible; the shuttle is the only way some visitors with disabilities will see the canyon.
- Staff training in accommodations for visitors with disabilities
- SOP's

The shuttle facilities were not reviewed in this project. Recommend conducting an SETP of the entire transportation system. Include:

- Maps and Information
- Shuttle storage/maintenance bldg.
- Staff training
- SOP's

Park Operations and Headquarters Bldgs.

Park operations and facilities were not reviewed in this project. Recommend conducting an SETP of NPS employee facilities, policies, and practices. Include:

- Park Housing
- Administration Building
- Maintenance buildings
- Ranger stations
- Parking
- Programs for staff
- Staff training
- SOP's

Scenic drives and overlooks

Requirements:

ABAAS Scoping requirements for Viewing Areas:

F246 Viewing Areas

F246.1 General. Viewing areas, other than viewing areas on trails, shall comply with F246.1.

Advisory F246.1 General. Viewing areas on trails are addressed in F247.4.3.

F246.2 Distinct Viewing Locations. Each distinct viewing location within a viewing area shall comply with 1015.

Advisory F246.2 Distinct Viewing Locations. Viewing areas can provide more than one distinct viewing location. For example, a viewing area can provide a distinct viewing location for observing a mountain range, and another distinct viewing location for observing a river. Distinct viewing locations within a viewing area can be designated by signs or other markers.

F246.3 Outdoor Constructed Features. Where provided within viewing areas, at least 20 percent, but not less than one, of each type of outdoor constructed feature shall comply with 1011.

F246.4 Outdoor Recreation Access Routes. At least one outdoor recreation access route complying with 1016 shall connect accessible parking spaces or other arrival points serving the viewing area with accessible elements, spaces, and facilities provided within the viewing area.

Advisory F246.4. Outdoor Recreation Access Routes. There are exceptions in 1016.1 that can be used where conditions specified in 1019 apply.

Recommendations: There are many overlooks throughout the park, many are without sidewalks or other amenities, meant to be viewed from inside the vehicle – these pull-off/overlook areas are used the same way by all visitors and do not discriminate; accessible parking, signs, accessible slopes are not required at this type of overlook.

- Scenic drive overlooks – There are several overlooks with the same views along the east entrance road, Section 504 program requirements “when viewed in their entirety” would apply to these pull-offs with equivalent programs. Recommend altering all pull-offs that can be made accessible with minimal alterations when alterations are made to these pull-offs. (minimal in this context is if the alteration does not cost more than 20% of the overall alteration to make the facility accessible)
- Waysides – Waysides need to be accessible to visitors with disabilities. This requires:
 - an accessible van parking space, access aisle, and an accessible route to wayside with turning space and clear floor space at wayside.
 - wayside should be placed for a forward approach, on a firm and stable surface with height from the ground surface to exhibit frames at exactly 27” to meet protruding object and clear knee space ABAAS requirements.
 - information provided on the wayside needs to be in an accessible font and provide an alternative format for the blind.
- Restrooms – Restrooms provided at pull-offs need to be accessible, all are at different locations along the scenic drives and do not meet the requirements of “viewed in their entirety”.
- Parking at the east tunnel portal – recommend moving the accessible space to the level side of the parking lot and provide accessible route to restroom and ranger station:



Corral - Horseback Rides

Requirements: This program is required to be accessible per Section 504 of the Rehabilitation Act.

Findings: Canyon Trail Rides operates this program in the park. In interviewing the staff, several issues were identified:

- they have many people with mobility impairments that go on the rides; users have a difficult time making their ride time due to shuttle wait time and distance from lodge shuttle stop to corral, (the scheduled rides cannot wait for latecomers);
- there is no accessible parking for the corral and no accessible route from the parking area to the check-in building;
- there are no accessible amenities provided: covered porch is not accessible; no wheelchair storage; no horse mounting ramp provided, riders cannot transfer to horseback from a ramped platform, they must be lifted by staff
- website does not provide information on accessibility

Zion National Park Rides Zion Canyon Horseback Rides

Season Dates: *March 12 – October 31, 2016*

Your horseback excursion through beautiful Zion National Park will be the highlight of your vacation experience. From the time you mount up until our first rest stop, scenes and natural wonders will open to you at every turn.

You'll see such natural wonders as the Three Patriarchs, the Beehives, and take a breathtaking jaunt through beautiful cactus gardens. For a nice relaxing horseback tour, the 1 hour ride will follow the Virgin River for about one mile to the Court of the Patriarchs and return you back to the loading corral. For a more adventurous horseback ride the three hour trip will take you around the Sandbench Trail, gradually ascending 500 feet giving you a spectacular view of the Southern end of Zion National Park.

Zion Canyon National Park rides can be booked from March – October. These rides take place in Zion National Park.



1 HOUR TRIP – VIRGIN RIVER RIDE

3 HOUR TRIP – SAND BENCH TRAIL



Recommendations: Recommend providing a van accessible parking space, and accessible routes to all visitor use areas; provide access to the covered porch and an accessible seating space and horse mounting ramp. Provide training for staff on providing services for people with disabilities. Recommend providing an SOP to allow people with disabilities with reservations for a trail ride to obtain a pass to drive their own vehicle to this location.



Suggested Portable Ramp solution (provide a mounting block as well for helpers to use):

The Handi-Ramp Portable Horse Mounting Ramp:

- Portability – Our aluminum mounting ramp can be stored in pieces and transported in the back of a pickup truck. It can be assembled wherever it is needed in 3 minutes by 2 people without any tools or special skills.
- Walking surface – Made from our 360° Non-Slip aluminum walking surface, the same surface used in our wheelchair ramp systems for homes and businesses. The surface requires no special treatment or maintenance and can be cleaned completely with a garden hose.

Horse Mounting Ramp

800-876-RAMP (7267)

Trails

Zion Canyon has many trails to hike, almost all of them start on the flat valley floor then quickly begin to climb the steep, vertical walls of the canyon. Trails in the park (from park website):

- *Pa'rus Trail - accessible*
- *Archeology Trail*
- *Lower Emerald Pool Trail*
- *The Grotto Trail*
- *Weeping Rock Trail*
- *Riverside Walk - accessible*
- *Watchman Trail*
- *Sand Bench Trail*
- *Upper Emerald Pool Trail*
- *Kayenta Trail*
- *Canyon Overlook Trail*
- *Taylor Creek Trail*

- *Timber Creek Overlook Trail*
- *Angels Landing via West Rim Trail*
- *Hidden Canyon Trail*
- *Observation Point via East Rim Trail*
- *The Narrows via Riverside Walk*
- *Kolob Arch via La Verkin Creek Trail*

Requirements:

ABAAS Excerpts for Trails and Beach Access Requirements

F247 Trails

F247.1 General. Where a trail is designed for use by hikers or pedestrians and directly connects to a trailhead or another trail that substantially meets the requirements in 1017, the trail shall comply with 1017.

Advisory F247.1 General. The Federal Trail Data Standards classify trails by their designed use and managed use. A trail has only one designed use that determines the design, construction, and maintenance parameters for the trail. A trail can have more than one managed use based on a management decision to allow other uses on the trail. Trails that have a designed use for hikers or pedestrians are required to comply with 1017. Trails that have a designed use for other than hikers or pedestrians are not required to comply with 1017.

A trail system may include a series of connecting trails. Only trails that directly connect to a trailhead or another trail that substantially meets the requirements in 1017 are required to comply with 1017.

F247.2 Existing Trails. Where the original design, function, or purpose of an existing trail is changed and the altered portion of the trail directly connects to a trailhead or another trail that substantially meets the requirements in 1017, the altered portion of the trail shall comply with 1017.

Advisory F247.2 Existing Trails. Routine or periodic maintenance activities that are performed to return an existing trail to the condition to which the trail was originally designed are not required to comply with 1017.

F247.3 Trailheads. Trailheads shall comply with F247.3.

Advisory F247.3 Trailheads. Trailhead information signs are addressed in F216.13.

F248 Beach Access Routes

F248.1 General. Beach access routes complying with 1018 shall be provided in accordance with F248.1. Beach access routes shall be permanent or removable.

EXCEPTION: Beach access routes shall not be required where pedestrian access to the beach is not permitted.

Advisory F248.1 General. There are exceptions in 1018.1 that can be used where conditions specified in 1019 apply. Removable beach access routes can be moved to a protected storage area during storms and other periods when the routes are subject to damage or loss.

1018 Beach Access Routes

1018.1 General. Beach access routes shall comply with 1018.

EXCEPTIONS: 1. When an entity determines that a condition in 1019 does not permit full compliance with a specific provision in 1018 on a portion of a beach access route, the portion of the beach access route shall comply with the provision to the extent practicable.

1018.2 Connections. Beach access routes shall connect an entry point to the beach to the:

1. High tide level at tidal beaches;
2. Mean high water level at river beaches; or
3. Normal recreation water level at lake, pond, and reservoir beaches.

1018.3 Surface. The surface of beach access routes and resting intervals shall be firm and stable.

1018.4 Clear Width. The clear width of beach access routes shall be 60 inches (1525 mm) minimum.

Findings: None of the trails in the park meet the requirements in ABAAS for accessible trails. Trailheads do not meet requirements for an accessible van parking space with access aisle. Almost all trails, within 100 yards from the trailhead, become too steep to make accessible without extreme cuts and fills that will negatively impact the natural resources in the valley. The Riverside Walk ends with steps down to the river, there is no accessible route (ABAAS beach access route) to the river edge in the park; river play is a key activity during the summer months.



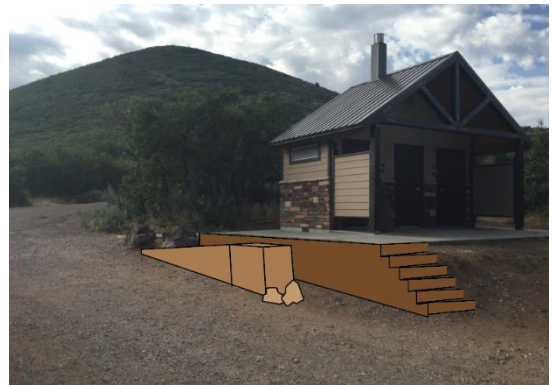
There are no accessible backcountry trail experiences in Zion National Park, although not required by the wilderness act or ABAAS, experiencing the backcountry wilderness is a core value and key experience in the park.

Recommendations:

Recommend focusing on providing accessible trail experiences in Zion N.P. on the Pa'rus Trail, Riverwalk Trail including access to the river, and backcountry trail to campsite (by horseback) at Hop Valley. Recommend completing a transition plan for these three trails. Identify key inaccessible trail experiences to provide in alternative format including the Court of the Patriarchs at waysides at the shuttle stop, a wayside and tactile model of Angels Landing chain climbing trail section (location? – lodge?), Great White Throne tactile model at the overlook, etc.

Provide accessible parking, route to restroom and a horse transfer station at the Hop Valley trailhead and a freestanding transfer station at the backcountry campsite in the valley to make this an accessible experience. When completed, provide information on the website and let disability organizations know about it.

Study potential of providing accessible trails at the top of the canyon on the east side of park to provide accessible views into the canyon.



Shuttle stops

There are nine shuttle stops in the main canyon:

1. Zion Visitor Center – see evaluation under Zion Visitor Center in this document
2. Human History Museum - see evaluation under Human History Museum in this document
3. Canyon Junction
4. Court of Patriarchs
5. Zion Lodge – see evaluation under the Lodge in this document
6. The Grotto – see evaluation under The Grotto Picnic Area in this document
7. Weeping Rock

8. Big Bend
9. Temple of Sinawava

Requirements:

Programs, services and activities provided at the shuttle stops need to be accessible to people (visitors and employees) with disabilities.

Canyon Junction

From park website: *The junction of the Zion-Mt. Carmel Highway and the Zion Canyon Scenic Drive Views of the Virgin River and Zion Canyon. Access to the Pa'rus Trail.*

Findings: The Pa'rus trail connects this shuttle stop with the visitor center. The trail drops steeply to go under the bridge of the main canyon road; this section far exceeds maximum slopes allowed by ABAAS. The shelters do not provide integrated accessible seating.

Recommendations: Recommend regrading this area to make the starting section of the Pa'rus trail accessible – it is one of the opportunities to provide an accessible trail in Zion National Park.

Court of the Patriarchs

From park website: *Short and steep trail to viewpoint Views of Abraham, Isaac, and Jacob Peaks, Mount Moroni, and The Sentinel.*

Findings: The trail to the overlook does not meet ABAAS accessibility standards. The interpretive waysides for this geological feature are located at the inaccessible overlook.



Recommendations: Recommend providing the waysides at the overlook in an accessible location at one of the shuttle stops as well. Conduct an evaluation of the trail to the overlook and measure site amenities and complete a transition plan for this area.

Weeping Rock

From park website: *Dripping springs create hanging gardens Restrooms. Ranger-led programs. Views of Angels Landing and Big Bend. Access to the Weeping Rock Trail, East Rim Trail, Hidden Canyon Trail, and Observation Point Trail.*



Findings: There is no compliant accessible route from the shuttle stop to the trailhead. The seating/gathering space does not provide a level space for wheelchair seating and all seating is in the busy path of travel to the trail (important to provide a shaded waiting space as the trail is not accessible).

Recommendations: Provide a compliant accessible route from shuttle drop-off to trailhead and restrooms. The trail should be made accessible to the point the grades exceed those allowed by ABAAS, and provide a covered seating area (numbered spaces below are suggested locations) with interpretation about the resource, and tactile model.

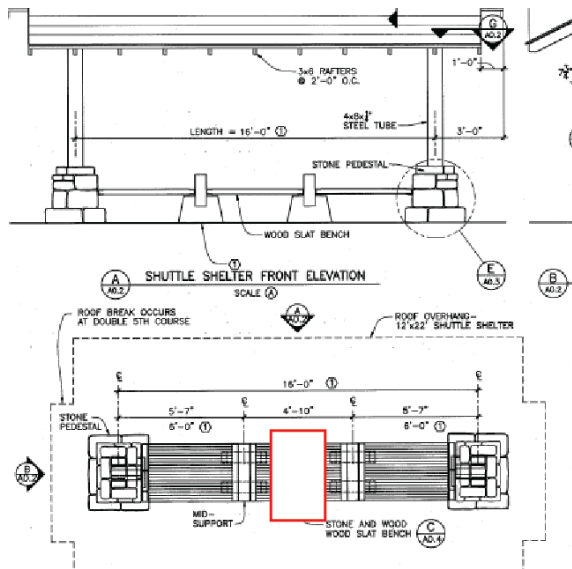


Big Bend

From park website: *Sweeping bend in the Virgin River with towering cliffs above Ranger-led programs. Views of the Virgin River, Angels Landing, and The Great White Throne.*

Findings: There is no accessible parking space with access aisle provided in this parking area. One van accessible parking space is required. Appears there is inadequate clear floor space under shelter for wheelchair.





Recommendations:

Add a van accessible parking space and access route to site amenities. Provide wheelchair space under shelter – there is adequate clear space at the center bench, recommend removing bench section in center to provide wheelchair space (red outlined rectangle on sketch). ABAAS requirement for seating areas for four or more people is for an integrated wheelchair seating space (ability to sit shoulder to shoulder with companion). Appears a wheelchair will fit under the shelter roof, but is not equivalent to the fixed benches provided for getting away from rain, snow, etc. Recommend completing the SETP for this park area including all measurements to determine most cost-effective way to provide access.



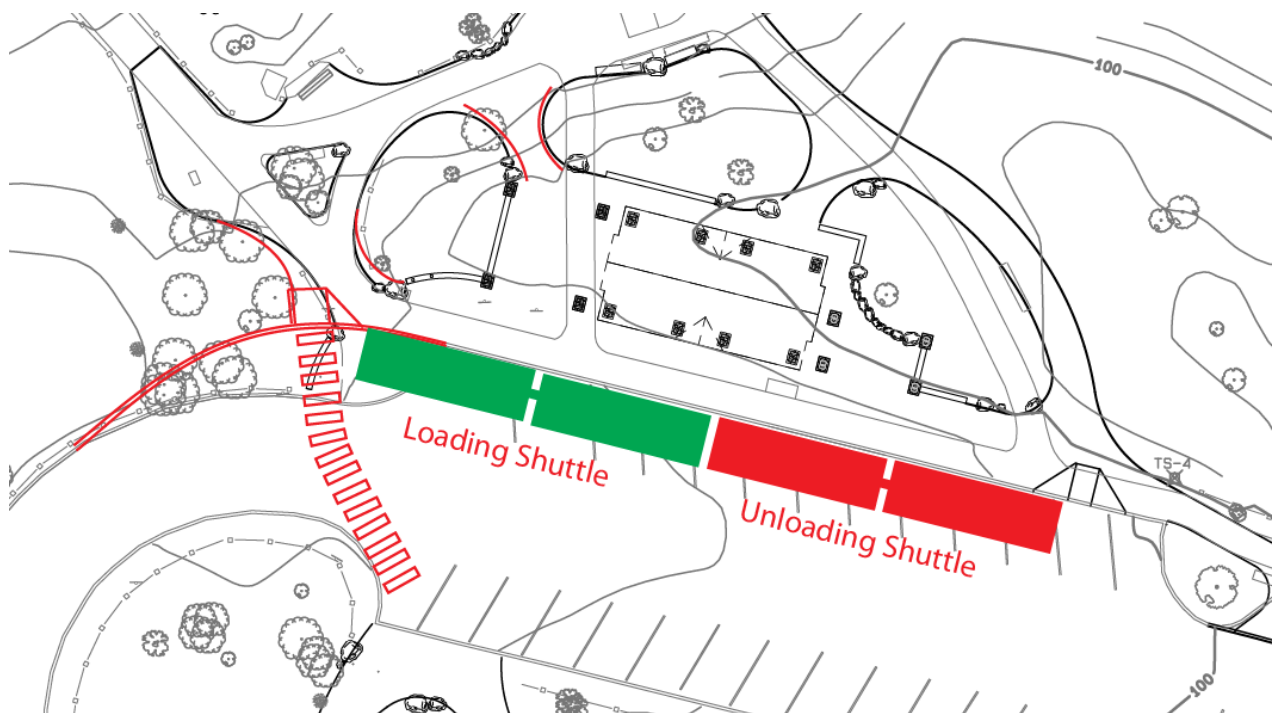
Temple of Sinawava

From park website: *The gateway to The Narrows Restrooms and water bottle filling station. Ranger-led programs. Access to the Riverside Walk, Virgin River, and The Narrows.*

Findings: The shuttles load and unload in the travel lane for the parking area – visitors enter and exit buses on the pavement of the off-season parking instead of onto the sidewalk (curb height) as in all other stops. The wheelchair lift does reach the pavement level, but visitors in the rear shuttle have to step down a very high, unexpected step. The two buses are unloading and loading at the same time, similar to operations at the visitor center. The curb length and turning radii do not allow two shuttles at the curb at the same time. Other findings:

- The accessible route to the restrooms is only by the outermost paths on each end of the parking area
- Restrooms appear to have same issues as those measured for the transition plans included in the scope of this project.

Recommendations: Recommend adding handrails on ramp section from shelter to restroom, extending the curb length at the loading/unloading zone with compliant curb ramp for accessible parking with adequate curb radius to allow shuttles to smoothly drive through drop-off:



Recommend completing the SETP for this park area including accessible trails and river access.

1.9 §17.550 (d) Transition Plan.

Requirements:

If structural changes to facilities are necessary to achieve program accessibility, the park is required to develop a transition plan identifying the steps necessary to complete such changes. The plan needs to be developed with the assistance of interested persons, including individuals with disabilities or organizations representing individuals with disabilities. A copy of the transition plan needs to be made available for public inspection. The plan includes, at a minimum—

- (1) Identify physical obstacles in the agency's facilities that limit the accessibility of its programs or activities to individuals with disabilities;
- (2) Describe in detail the methods that will be used to make the facilities accessible;
- (3) Specify the schedule for taking the steps necessary to achieve compliance with this section and, if the time period of the transition plan is longer than one year, identify steps that will be taken during each year of the transition period;
- (4) Indicate the official responsible for implementation of the plan; and
- (5) Identify the persons or groups with whose assistance the plan was prepared.

Findings:

Zion National Park does not have a Transition Plan on file.

The park and MTC determined the following park areas for Zion National Park. The highlighted areas were determined to be the highest priorities for making the park more accessible to visitors with disabilities and are included in this Self-evaluation and Transition Plan for High Priority Areas:

Zion Park Areas and Facilities Provided	
Highlighted Areas Are Included in this Self-evaluation and Transition Plan Database (TPD)	
<ul style="list-style-type: none"> ● South Entrance Area <ul style="list-style-type: none"> ○ Zion Canyon Visitor Center <ul style="list-style-type: none"> ■ Shuttle stop ■ Plaza, restrooms, gift shop, exhibits, films, etc. (includes all programs) 	<ul style="list-style-type: none"> ● South Entrance Area <ul style="list-style-type: none"> ○ South Entrance Station ○ South Campground ● Transportation System <ul style="list-style-type: none"> ○ Shuttle stops ○ Amenities at shuttle stops –

<p>taking place here).</p> <ul style="list-style-type: none"> ▪ Picnic area <ul style="list-style-type: none"> ○ Zion Human History Museum ○ Pedestrian Entrance Station ○ Watchman Campground ○ Nature Center ○ Ranger led Programs ○ Junior Ranger Program • Zion Lodge Area <ul style="list-style-type: none"> ○ Lodging ○ Dining ○ Grotto Picnic Area ○ Parking and pedestrian routes ○ Shuttle Stop ○ Open Air Tram Loading Area ○ Horseback rides • East Entrance Area <ul style="list-style-type: none"> ○ Entrance sign and parking ○ Entrance station ○ Restroom ○ Overlooks/pull-outs • Kolob Canyons Area <ul style="list-style-type: none"> ○ Visitor Center ○ Parking and pedestrian routes ○ Scenic drive overlooks ○ Scenic drive restroom 	<ul style="list-style-type: none"> restrooms, seating areas, trailheads, etc. <ul style="list-style-type: none"> ○ Vehicles ○ Maps and Information ○ Shuttle storage/maintenance bldg. ○ Open Air Tram • Trails and Wilderness Use <ul style="list-style-type: none"> ○ Trails ○ River access, river play ○ Wilderness programs and policies ○ Identify key inaccessible trail experiences to provide in alternative format • Lava Point Campground <ul style="list-style-type: none"> ○ Campsites ○ Comfort Station ○ Amenities ○ Trail, and Outdoor Access Routes • Park Administration <ul style="list-style-type: none"> ○ Maintenance and Headquarters Bldgs./Areas ○ Special use Buildings ○ Housing areas • Concession Administration <ul style="list-style-type: none"> ○ Maintenance and Headquarters Areas ○ Employee areas, parking, rec. ○ Housing ○ Employment policies
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Recommendations:

This Self-evaluation of policies and practices and evaluation of non-discrimination in park programs (SE) identifies park programs and experiences and prioritizes park areas and physical assets to be assessed in park area Transition Plans. The park should continue to review all programs and facilities to assure non-discrimination: The Zion SETP is not up to date until all park areas and programs are evaluated.

MTC utilizes a Transition Plan Database (TPD) to identify physical barriers found; recommend methods to remove these barriers; and provide a customizable schedule for barrier removal. The TPD is converted to an Excel spreadsheet for the park, known as the TPD. The TPD is sortable by asset, API, level of difficulty, type of work etc.

Example Transition Plan Database:

Facility	Asses	API	Are	Room/Sp	Element	Attribute	On-	Meet	Finding	Priority	Recommendation	Recomn	Citatic	Mitigati	
76	Hornbeck	4100	93	Ext	Exhibit Area	Walking Surface	Z-Other attribute	Stairs to entrances	NO	No accessible entrance provided to the house.	2-Services	When altered, make one entrance accessible with a compliant ramp, handrails, and landing at the door. Obtain a letter from SHPO stating why making 60% of the entrances accessible would destroy the historic significance.		403	1-High
77	Hornbeck	4100	93	Int	Exhibit Area	Door/Gate Clearances	Clearance, door opening height	76	NO	Door height is insufficient.	2-Services	Reframe door or alter threshold so that the door provides a clear opening of 80 inches minimum.	80 inches minimum	404, 402	2-Moderate
78	Hornbeck	4100	93	Int	Exhibit Area	Door/Gate Clearances	Clearance, door opening width	27	NO	Clear opening is too narrow.	2-Services	Reframe the doorway to provide a compliant clear opening width. Offset hinges may be used to facilitate the process.	32 inches minimum	404, 402	2-Moderate
79	Hornbeck	4100	93	Int	Exhibit Area	Door/Gate Clearances	Z-Other attribute	Stairs	NO	No accessible entrance provided to the house.	2-Services	Install a ramp to at least one entrance.		403	1-High
80	Hornbeck	4100	93	Int	Exhibit Area	Exhibit, Visual Component	Z-Other attribute	Way sign 37 to bottom	Not best practice	Way sign is too high.	2-Services	Lower the way sign so that the bottom edge of the sign is not lower than 27 inches.			2-Moderate
81	Hornbeck	4100	93	Ext	Parking Facility	Parking Space	Dimension, height of sign	48	NO	Parking sign is mounted too low.	1-Entry	Raise the sign.	60 inches minimum to the bottom of	502	3-Low
82	Visitor Center	4100	100	Ext	Walkway	Other Element	Z-Other attribute	No space beside	NO	No wheelchair space provided beside the bench.	2-Services	Provide a concrete pad that is 36 inches wide minimum by 48 inches deep minimum beside the bench.			2-Moderate
83	Visitor Center	4100	100	Int	Restroom Men's	Door/Gate Specs	Z-Other attribute	Doorstop	NO	Surface of door is not smooth and non-interrupted.	2-Services	Remove the doorstop.		404, 402	3-Low
84	Visitor Center	4100	100	Int	Restroom Men's	Lavatory Sink	Dimension, depth of knee clearance at 27"	7	NO	Depth of knee clearance is insufficient.	4-Other	Alter the guard under the lavatory so that there is a minimum depth of 8 inches at a height of 27 inches.	8 inches minimum	606	3-Low
85	Visitor Center	4100	100	Int	Restroom	Lavatorv Sink	Dimension, height	34.5	NO	Lavatorv/Sink is too high.	4-Other	Lower the lavatorv/sink.	34 inches	606	2-

1.10 §17.551 Program accessibility: New construction and alterations.

Requirements:

Each building or part of a building that is constructed or altered by, on behalf of, or for the use of the agency shall be designed, constructed, or altered so as to be readily accessible to and usable by people with disabilities.

Findings:

Zion National Park has applicable construction planned at this time.

Recommendations:

All new construction or covered alterations should meet the requirements of Section 504, the Architectural Barriers Act Accessibility Standards (ABAAS) and other applicable codes, laws and regulations.

1.11 §17.560 Effective Communications.

Requirements:

The park is required to take appropriate steps to ensure effective communication with applicants, participants, personnel of other Federal entities, and members of the public.

(1) The park needs to furnish appropriate auxiliary aids where necessary to afford individuals with disabilities an equal opportunity to participate in, and enjoy the benefits of, a program or activity conducted by the agency.

Findings:

Zion offers auxiliary aids for the shuttle rides, film in Museum of Human History. Additional findings are included under specific topics.

Recommendations:

Provide assistive listening devices for all amphitheaters, auditoriums and for large ranger talks.

1.12 §17.570 Compliance procedures.

Requirements:

The park is required to adopt and publish grievance procedures providing prompt and equitable resolution of complaints alleging discrimination on the basis of disability in programs or activities conducted by the park.

Findings:

ZION does not have grievance procedures published on website and in park newspaper. Additional findings are included under specific topics.

Recommendations:

Provide and publish grievance procedures for providing resolution of complaints.

From NPS.gov Accessibility website:

Filing a Complaint

If an individual with a disability or his or her representative believes that the NPS has not complied with any of the above-named accessibility laws, he or she can file a disability rights complaint as [explained on this website](#). Complaints may be filed by [sending a letter](#) to the National Park Service Equal Opportunity Program Office.

Filing A Disability or Accessibility Complaint with the NPS:

An individual may file a disability rights complaint with us regarding any aspect of the National Park Service's operations.

In filing a complaint with us, the complaint must be in writing, signed and dated, and filed no later than 180 days from the date of the alleged discrimination. The complaint should include your name, address, zip code, and telephone number; the name and address of the alleged discriminatory official(s) and/or public entity; the nature of the complaint and the date the alleged discrimination occurred. The complaint may be filed directly with the EEO Program Manager, National Park Service, 1849 C. Street NW, (0008), Washington, D.C. 20240.

Technical guidance for filing a complaint is available in a variety of formats: (this document is included in Appendix B, under title - NPS Section 504 Complaint Process Directive)

Requirements for Concessioner and Contracted programs (43 CFR Part 17, Subpart B):

Concessions

This section applies to programs provided by concessions and contractors (non-federal employees). Programs that take place in one of the facilities covered by transition plans included in this document are included in those sections. Employee programs and facilities were not reviewed in this project. Recommend requiring concessioners to conduct a Self-evaluation and Transition Plan of employee programs, employment practices and facilities. Key topics included in Section 504 to cover:

§17.201 Application.

§17.203 Discrimination prohibited.

§17.205 Remedial action, voluntary action, and self-evaluation.

§17.206 Designation of responsible employee and adoption of grievance procedures.

§17.207 Notification.

§17.210 Employment practices.

§17.211 Reasonable accommodation.

§17.212 Employment criteria.

§17.217 Existing facilities.

§17.218 New construction.

§17.260 Historic Preservation Programs.

§17.270 Recreation.

Programs to evaluate include:

- Employee Living areas
 - housing
 - Dorms
 - Apartments
 - House
 - Recreation (interior/exterior)
 - Dining
 - Laundry
 - Restrooms and showers
 - Parking
 - Other amenities
- Concession operations
 - Maintenance facilities
 - Vehicles
 - Service areas
 - Housekeeping
 - Kitchen and bar areas

2. 36 CFR Parts 1 – 7 and the Superintendents Compendium

The Superintendent’s Compendium is the summary of park specific rules implemented under 36 Code of Federal Regulations (36 CFR). It serves as public notice, identifies areas closed for public use, provides a list of activities requiring either a special use permit or reservation, and elaborates on public use and resource protection regulations pertaining specifically to the administration of the park. The Superintendent’s Compendium does not repeat regulations found in 36 CFR and other United States Code and CFR Titles, which are enforced without further elaboration at the park level.

The regulations contained in 36 CFR, Parts 1-7, are the basic mechanism used by the National Park Service (NPS) to preserve and protect the natural and cultural resources of the park and to protect visitors and property within the park. Parts 1 through 6 are general regulations applicable to all areas of the National Park system, and Part 7 contains special regulations specific to individual parks. Each of these Parts has many sections and subsections articulating specific provisions. Within some of these Part 1-7 sections and subsections, the Superintendent is granted discretionary authority to develop local rules to be responsive to the needs of a specific park resource or activity, park plan, program, and/or special needs of the general public.

2.1 36 CFR PART 1 — General Provisions (§§ 1.1 - 1.10)

§ 1.5 Closures and public use limits.

(a) Consistent with applicable legislation and Federal administrative policies, and based upon a determination that such action is necessary for the maintenance of public health and safety, protection of environmental or scenic values, protection of natural or cultural resources, aid to scientific research, implementation of management responsibilities, equitable allocation and use of facilities, or the avoidance of conflict among visitor use activities, the superintendent may:

(1) Establish, for all or a portion of a park area, a reasonable schedule of visiting hours, impose public use limits, or close all or a portion of a park area to all public use or to a specific use or activity.

(2) Designate areas for a specific use or activity, or impose conditions or restrictions on a use or activity.

§ 1.6 Permits.

(a) When authorized by regulations set forth in this chapter, the superintendent may issue a permit to authorize an otherwise prohibited or restricted activity or impose a public use limit.

§ 1.7 Public notice.

Requirements:

The Superintendent's Compendium public use limits and area designations should not discriminate against individuals with disabilities, unless use restrictions are required to prevent resource damage greater than standard use allowed. Provide Section 504 compliant use limits, permit process, and accessible public notices.

Findings:

ZION restricts the use of mobility devices in wilderness areas to non-motorized wheelchairs only. Research Natural Areas (RNAs) are closed to all recreational use. Excerpt from ZION 2015 Compendium:

(a)(1)(xi) The Zion wilderness (including the area of the park within Kane County which has been recommended to congress for wilderness designation), is closed to the possession or use of any mechanical equipment for moving people or material in or over land, water, snow or air.

This includes, but is not limited to, non-motorized wheeled vehicles, conveyances and devices, such as bicycles, Segways™ and other Electric Personal Assistance Mobility Devices (EPAMD), carts, game carriers, canoe dollies, wheelbarrows, wagons, ski kites, hang gliders and

paragliders. Wheelchairs as defined in Title V Section 507(c) of the Americans with Disabilities Act (ADA) may be used by persons with disabilities.

Justification: The Wilderness Act of 1964 prohibits certain uses in areas included within the national wilderness preservation system including any form of mechanical transport.

Recommendations:

These restrictions meet ABAAS, Wilderness Act and NPS policy. Recommend including policy on accessibility page of park website.

2.2 36 CFR PART 2 — Resource Protection, Public Use and Recreation (§§ 2.1 - 2.62)

36 CFR Part 2 provides regulations for protecting park natural and cultural resources and regulations for public use and recreation. Key sections to verify Section 504 compliance in the Superintendent's Compendium:

§ 2.1(a)(5) Walking on, climbing, entering, ascending, descending, or traversing an archeological or cultural resource, monument, or statue, except in designated areas and under conditions established by the superintendent.

§ 2.10 Camping - designated sites, areas, conditions and permits

§ 2.11 Picnicking - designated areas

§ 2.15 Pets.

(a) The following are prohibited:

(1) Possessing a pet in a public building, public transportation vehicle, or location designated as a swimming beach, or any structure or area closed to the possession of pets by the superintendent. This subparagraph shall not apply to guide dogs accompanying visually impaired persons or hearing ear dogs accompanying hearing-impaired persons.

Requirements:

The Superintendent's Compendium resource protection, public use and recreation use limits and designations should not discriminate against individuals with disabilities, unless use restrictions are required to prevent resource damage greater than standard use allowed. Provide Section 504 compliant use limits, permit process, and designations.

Findings:

ZION has use limits identified for the preservation of natural and cultural resources. Part 2.15 Pets restricts pets except service dogs. Part 2.16 identifies horse use limits and designated parking; there is no designated accessible parking or horse mounting ramp provided for Hop Valley backcountry horse trail and campsite. Excerpts from ZION 2015 Compendium:

§2.10 Camping and Food Storage

Requirements:

The Superintendent's Compendium camping and food storage limits should not discriminate against individuals with disabilities, unless use restrictions are required to prevent resource damage greater than standard use allowed. Provide Section 504 compliant use limits.

Findings:

ZION camping and food storage use limits are the same for all users and do not discriminate.

Recommendations:

Although the use limits are the same, there are uses not available to people with disabilities: there are no accessible backcountry campsites, walk-in tent or group campsites identified. Food is required to be stored in bear-proof boxes, these are not accessible. Recommend making these programs accessible to people with mobility impairments.

§2.15 Pets

(a)(1)(i) Pets are prohibited on all trails (with the exception of the Pa'rus trail) and in the wilderness. This prohibition does not include service animals.

No pets, other than service animals, are allowed on the park transportation shuttle buses.

Pet excrement must be picked up from all areas within Zion National Park.

Park employees residing in the park may keep pets in accordance with Zion National Park Housing Plan.

Properly restrained pets are allowed along public roads and parking areas (generally within 100 feet of the road surface), in the developed campgrounds and picnic areas, and on the grounds of the Zion Lodge.

Justification: Consistent with public health and safety, protection of natural resources and avoidance of conflict among visitor use activities, pets must be restricted. The burden is placed on pet owners to assure their pets do not destroy park values for others in those areas where they are allowed. Pet disposal stations are provided along the Pa'rus Trail for this purpose.

§2.16 Horses and Pack Animals

(a) "Saddle stock" is defined, for purposes of the Zion National Park General Management Plan, as stock carrying either riders or equipment/supplies and is limited to horses, mules, and burros.

“Pack animals,” for purposes of 36 CFR 2.16(a) are defined as mules and burros. Llamas, goats, dogs, and all other animals are specifically excluded for use as pack animals within Zion National Park.

(b) The use of saddle stock or pack animals is prohibited, except in the following areas:

The following trails are open to horse or pack animal use:

- LaVerkin Creek Trail west of Beartrap Canyon
- Hop Valley Trail
- Connector Trail
- Northgate Peaks Trail
- Wildcat Canyon Trail
- West Rim Trail north of Cabin Spring
- Sawmill Spring Trail
- Telephone Canyon Trail
- East Mesa Trail east of the Observation Point Trail junction
- East Rim Trail south of Stave Spring
- Deer Trap Mountain Trail
- Cable Mountain Trail
- Chinle Trail
- Sandbench Trail (open to public use from November 1 to March 1 only)

Off-trail use of horses or pack animals is permitted only in:

- Lower Coalpits Wash from the trailhead to the junction with Scoggins Wash
- Scoggins Wash
- Huber Wash

Horse or pack animal use on wilderness trails is prohibited during spring thaws, during unusually wet periods, and at other times when, at the Superintendent’s discretion, use would cause undue trail damage.

NPS administrative uses are exempt in these areas for the purpose of resource/visitor protection and the utilization of minimum tool for trail maintenance.

(g)(1) Grazing of horses or pack animals within park boundaries is prohibited.

Stock must be fed only certified weed-free feed 24 hours prior to entering the wilderness. Stock users are required to pack feed such as grain or pellets that are certified as weed-free. This feed must be protected from animal depredation and any unused feed must be packed out. A feed bag must also be used in the wilderness. Stock manure must be collected upon unloading and loading from trailers with the manure removed from the park to reduce the potential for exotic plant introduction.

(g)(2) Overnight camping with horses or pack animals is limited to Hop Valley Site A, and is permitted for one night only.

(g)(3) Horses or pack animals will be hobbled or tethered on a high line (6-7 feet) between trees, or otherwise restrained in a manner preventing damage to trees. Animals will not be picketed or tied to a single tree.

(g)(4) Horses or pack animals will be kept more than 200 feet from any spring, stream, or other water source unless in the act of watering, riding or leading the animal near or across the water as a necessary function of wilderness travel.

(g)(5) A maximum of 6 horses or pack animals are allowed in any single party traveling in Zion National Park. These groups may not be split up as referenced in section 1.5 (a)(2)(xiii).

The contracted concessionaire is excluded from this restriction while traveling along the Sandbench Trail for commercial horse trail rides.

Justification: Stock and pack animals are defined as horses, mules, and burros for the purpose of this regulation. Stock use within the park is historically documented and their continued presence is conditionally permitted. Consistent with public health, protection of environmental values and natural resources, and avoidance of conflict among visitor use activities, the Superintendent has determined that restriction of horse and saddle stock is necessary.

The LaVerkin Creek drainage is not suitable for overnight-pack stock use due to designated campsites that are heavily used and not adequate for stock tethering, picketing, or high-lining. Tying of animals is necessary to minimize resource damage, pollution of water sources and destruction of vegetation.

The Kolob Arch trail is not appropriate for saddle stock as it involves scrambling over large boulders, steep slickrock, and stream bottom areas.

Beartrap Canyon and Willis Creek are narrow canyons characterized by no maintained trail, a number of steep banks, slopes, and stream bottom areas, which make the route unsuitable for stock use.

The East Mesa Trail below its junction with the Observation Point Trail and Zion Canyon trails from the rim to the canyon floor are heavily traveled by hikers, and the trails are often steep and narrow.

Restricting the presence of animals in developed areas is necessary to maintain a non-offensive and sanitary condition in these areas of intensive use.

For the safety of riders, the Sandbench Trail is closed to non-concessionaire use during the operation of the concessionaire-contracted trail rides.

The Taylor Creek Trail, a front country route, is characterized by numerous steep creek banks, steep slopes, and numerous short stream crossings. Large groups of stock with riders create unacceptable resource impacts while standing/stopping in fragile riparian and canyon areas.

Due to problems with the spread of noxious/exotic weeds, all stock using Zion National Park must be fed only certified weed-free hay and feed 24 hours prior to entering the park and using park trails.

Recommendations:

Part 2.16 Horses and pack animals identifies camping at Hop Valley Site A campsite – provide accessible amenities and horse transfer system to make this program accessible. Add to accessibility, things to do and stock use pages on the park website.

Park website horse use information:

Zion	National Park Service U.S. Department of the Interior
Hop Valley Trail	
	
Campsite A and view from the site	

Campsite A (#1) Horse Camp

This is a designated stock camp or suitable for large groups. The main trail crosses Hop Creek at this point to begin the ascent through the forest towards the La Verkin Creek Junction. There is great shade provided by the ponderosa trees around the site. This site has a maximum group size of 12 and is available for walk-up permit only.

Stock Use

Trails

Check the [Wilderness Map](#) to find out what trails open to stock use. Where trails are present, stock animals must remain on trails. Free trailing or loose herding is not allowed. Maintain a slow walk when passing hikers. When standing, stock must be kept at least 100 feet from drainages. Off-trail use is permitted only in Lower Coalpits Wash from the trailhead to the junction with Scoggins Wash, in Scoggins Wash, and in Huber Wash.

Overnight Trips

The only overnight stock camp is Hop Valley Site A and your stay is limited to one night. A permit is required. Stock must be hobbled or tethered to reduce damage to vegetation. To reduce the spread of noxious and exotic weeds, stock must be fed certified weed-free hay two days prior to the trip.

2.3 36 CFR PART 3 — Boating and Water Use Activities (§§ 3.1 - 3.19)

Requirements:

The Superintendent's Compendium boating and water use limits and designations should not discriminate against individuals with disabilities, unless use restrictions are required to prevent resource damage greater than standard use allowed. Provide Section 504 compliant use limits, permit process, and designations including designated launching areas.

Findings:

ZION has no boating uses.

Recommendations:

N/A

2.4 36 CFR PART 4 — Vehicles and Traffic Safety (§§ 4.1 - 4.31)

Requirements:

The Superintendent's Compendium vehicle use limits should not discriminate against individuals with disabilities, unless use restrictions are required to prevent resource damage greater than standard use allowed. Provide Section 504 compliant use limits.

Findings:

ZION has no additional vehicle use limits in the Compendium.

Recommendations:

N/A

2.5 36 CFR PART 5 — Commercial and Private Operations (§§ 5.1 - 5.14)

§ 5.8 Discrimination in employment practices.

(a) The proprietor, owner, or operator of any hotel, inn, lodge or other facility or accommodation offered to or enjoyed by the general public within any park area is prohibited from discriminating against any employee or maintaining any employment practice which discriminates because of race, creed, color, ancestry, sex, age, disabling condition, or national origin in connection with any activity provided for or permitted by contract with or permit from the Government or by derivative subcontract or sublease. As used in this section, the term “employment” includes, but is not limited to, employment, upgrading, demotion, or transfer; recruitment, or recruitment advertising; layoffs or termination; rates of pay or other forms of compensation; and selection for training including apprenticeship.

(b) Each such proprietor, owner or operator shall post either the following notice:

Notice

This is a facility operated in an area under the jurisdiction of the United States Department of the Interior. No discrimination in employment practices on the basis of race, creed, color, ancestry, sex, age, disabling condition, or national origin is permitted in this facility. Violations of this prohibition are punishable by fine, imprisonment, or both.

Complaints or violations of this prohibition should be addressed to the Director, National Park Service, P.O. Box 37127, Washington, D.C. 20013-7127.

or notices supplied in accordance with Executive Order 11246 at such locations as will ensure that the notice and its contents will be conspicuous to any person seeking employment.

§ 5.9 Discrimination in furnishing public accommodations and transportation services.

(a) The proprietor, owner or operator and the employees of any hotel, inn, lodge, or other facility or accommodation offered to or enjoyed by the general public within a park area and, while using such a park area, any commercial passenger-carrying motor vehicle service and its employees, are prohibited from: (1) Publicizing the facilities, accommodations or any activity conducted therein in any manner that would directly or inferentially reflect upon or question the acceptability of any person or persons because of race, creed, color, ancestry, sex, age,

disabling condition, or national origin; or (2) discriminating by segregation or otherwise against any person or persons because of race, creed, color, ancestry, sex, age, disabling condition, or national origin in furnishing or refusing to furnish such person or persons any accommodation, facility, service, or privilege offered to or enjoyed by the general public.

(b) Each such proprietor, owner, or operator shall post the following notice at such locations as will insure that the notice and its contents will be conspicuous to any person seeking accommodations, facilities, services, or privileges:

Notice

This is a facility operated in an area under the jurisdiction of the U.S. Department of the Interior.

No discrimination by segregation or other means in the furnishing of accommodations, facilities, services, or privileges on the basis of race, creed, color, ancestry, sex, age, disabling condition or national origin is permitted in the use of this facility. Violations of this prohibition are punishable by fine, imprisonment, or both.

Complaints of violations of this prohibition should be addressed to the Director, National Park Service, P.O. Box 37127, Washington, D.C. 20013-7127.

Requirements:

Employment practices: public accommodations and services are required to post notices of non-discrimination in public and employee spaces at such locations as will ensure that the notice and its contents will be conspicuous to any person seeking employment.

Public accommodations and transportation services are required to provide notice at such locations as will insure that the notice and its contents will be conspicuous to any person seeking accommodations, facilities, services, or privileges:

Findings:

MTC did not verify required notices posted at ZION.

Recommendations:

Provide (verify) notices of non-discrimination are posted in public, concession and employee (NPS and concession) spaces.

2.6 36 CFR PART 7 — Special Regulations, Areas of The National Park System (§§ 7.1 - 7.100)

Requirements:

The Superintendent's Compendium special regulations should not discriminate against individuals with disabilities, unless use restrictions are required to prevent resource damage greater than standard use allowed. Provide Section 504 compliant special regulations.

Findings:

§7.10 Zion National Park.

(a) *Vehicle convoy requirements.* (1) An operator of a vehicle that exceeds load or size limitations established by the superintendent for the use of park roads may not operate such vehicle on a park road without a convoy service provided at the direction of the superintendent.

(2) A single trip convoy fee of \$15 is charged by the superintendent for each vehicle or combination of vehicles convoyed over a park road. Payment of a convoy fee by an operator of a vehicle owned by the Federal, State or county government and used on official business is not required. Failure to pay a required convoy fee is prohibited.

(b) *Snowmobiles.* After consideration of snow and weather conditions, the superintendent may permit the use of snowmobiles on designated routes within the park. Snowmobile use is restricted to the established roadway. All off-road use is prohibited. The designated routes are defined as follows:

(1) All of the paved portion of the Kolob Terrace Road from the park boundary in the west one-half of Sec. 33, T. 40 S., R. 11 W., Salt Lake Base and Meridian, north to where this road leaves the park in the northwest corner of Sec. 16, T. 40 S., R. 11 W., SLBM. This paved portion of the Kolob Terrace Road is approximately three and one-half miles in length.

(2) All of the unplowed, paved portions of the Kolob Terrace Road from the park boundary, north of Spendlove Knoll, in Sec. 5, T. 40 S., R. 11 W., SLBM, north to where this road leaves the park in the southwest corner of Sec. 23, T. 39 S., R. 11 W., SLBM, a distance of approximately five miles.

(3) The unplowed, graded dirt road from the park boundary in the southeast corner of Sec. 13, T. 39 S., R. 11 W., SLBM, south to Lava Point Fire Lookout in the northwest quarter of Sec. 31, T. 39 S., R. 10 W., SLBM, a distance of approximately one mile.

(4) The unplowed, graded dirt road from the Lava Point Ranger Station, southeast to the West Rim Trailhead and then to a point where this road divides and leaves the park, in the southeast

corner of Sec. 30, and the northeast corner of Sec. 31, T. 39 S., R. 10 W., SLBM, a distance of approximately two miles.

(5) The unplowed, graded dirt road from the Lava Point Ranger Station, north to the park boundary where this road leaves the park, all in the southeast corner of Sec. 13, T. 39 S., R. 11 W., SLBM, a distance of approximately one-fourth mile.

Recommendations:

2.7 36 CFR PART 71—Recreation Fees

Requirements:

The Superintendent's Compendium recreation fee regulations should not discriminate against individuals with disabilities. Provide Section 504 compliant recreation fee regulations.

Findings:

This regulation does not include the access pass for visitors with disabilities

Recommendations:

Clearly state in park regulations and on the website how to obtain access pass.

3. Federal Management Regulation (FMR)

3.1 Subchapter C—Real Property, Part 102-76—Design and Construction, Subpart C—Architectural Barriers Act

GSA is the standard setting agency for the National Park Service. GSA sets regulations requiring ABAAS as the standard for NPS to follow. In these sections, GSA sets requirements for accessible alterations and priority order for providing access. These sections also define a primary function area, and describe the waiver and modification process for the NPS and other agencies under GSA's authority.

3.2 §102-76.70—When are the costs of alterations to provide an accessible path of travel to an altered area containing a primary function disproportionate to the costs of the overall alterations for facilities subject to the standards in [§102-76.65\(a\)](#)?

Requirements:

For facilities subject to the standards in [§102-76.65\(a\)](#), the costs of alterations to provide an accessible path of travel to an altered area containing a primary function are disproportionate to the costs of the overall alterations when they exceed 20 percent of the costs of the alterations to the primary function area. If a series of small alterations are made to areas containing a primary function and the costs of any of the alterations considered individually would not result in providing an accessible path of travel to the altered areas, the total costs of

the alterations made within the three year period after the initial alteration must be considered when determining whether the costs of alterations to provide an accessible path of travel to the altered areas are disproportionate. Facilities for which new leases are entered into must comply with F202.6 of the Architectural Barriers Act Accessibility Standard without regard to whether the costs of alterations to comply with F202.6 are disproportionate to the costs of the overall alterations.

Recommendations:

Future alterations should strive to be made fully accessible, if costs are disproportionate, comply with these regulations.

3.3 §102-76.75—What costs are included in the costs of alterations to provide an accessible path of travel to an altered area containing a primary function for facilities subject to the standards in §102-76.65(a)?

Requirements:

For facilities subject to the standards in [§102-76.65\(a\)](#), the costs of alterations to provide an accessible path of travel to an altered area containing a primary function include the costs associated with—

- (a) Providing an accessible route to connect the altered area and site arrival points, including but not limited to interior and exterior ramps, elevators and lifts, and curb ramps;
- (b) Making entrances serving the altered area accessible, including but not limited to widening doorways and installing accessible hardware;
- (c) Making restrooms serving the altered area accessible, including, but not limited to, enlarging toilet stalls, installing grab bars and accessible faucet controls, and insulating pipes under lavatories;
- (d) Making public telephones serving the altered area accessible, including, but not limited to, placing telephones at an accessible height, and installing amplification devices and TTYs;
- (e) Making drinking fountains serving the altered area accessible; and
- (f) Making parking spaces serving the altered area accessible.

Recommendations:

Future alterations should strive to be made fully accessible, if costs are disproportionate, comply with these regulations.

3.4 §102-76.80—What is required if the costs of alterations to provide an accessible path of travel to an altered area containing a primary function are disproportionate to the costs of the overall alterations for facilities subject to the standards in §102-76.65(a)?

Requirements:

For facilities subject to the standards in [§102-76.65\(a\)](#), if the costs of alterations to provide an accessible path of travel to an altered area containing a primary function are disproportionate to the costs of the overall alterations, the path of travel must be made accessible to the extent possible without exceeding 20 percent of the costs of the alterations to the primary function area. Priority should be given to those elements that will provide the greatest access in the following order:

- (a) An accessible route and an accessible entrance;
- (b) At least one accessible restroom for each sex or a single unisex restroom;
- (c) Accessible telephones;
- (d) Accessible drinking fountains; and
- (e) Accessible parking spaces.

Recommendations:

In determining priority for accessibility alterations, utilize this priority order along with priorities set to make Zion core experiences accessible.

3.5 §102-76.85—What is a primary function area for purposes of providing an accessible route in leased facilities subject to the standards in §102-76.65(a)?

Requirements:

For purposes of providing an accessible route in leased facilities subject to the standards in §102-76.65(a), a primary function area is an area that contains a major activity for which the leased facility is intended. Primary function areas include areas where services are provided to customers or the public, and offices and other work areas in which the activities of the Federal agency using the leased facility are carried out.

3.6 §102-76.90—Who has the authority to waive or modify the standards in §102-76.65(a)?

Requirements:

The Administrator of General Services has the authority to waive or modify the standards in §102-76.65(a) on a case-by-case basis if the agency head or GSA department head submits a

request for waiver or modification and the Administrator determines that the waiver or modification is clearly necessary.

4. Directors Order #16A Reasonable Accommodation for Applicants and Employees with Disabilities

This Director's Order establishes the framework for meeting reasonable accommodation requirements in all areas of employment, including: application, hiring, retention, promotion, recognition, and Special Hiring Authority. Within this framework, NPS Human Resources and Equal Opportunity Program officials will take the lead in providing specific guidance and services to applicants, employees, and supervisors and other managers with respect to the provision of reasonable accommodation.

This Director's Order is a key ingredient of NPS goals to achieve diversity within the organization and provide equal employment opportunities. Supervisors will be accountable for ensuring diversity through reasonable accommodation in all areas of employee selection and development. Supervisors are encouraged to become knowledgeable of the many resources available and to make a complete evaluation of the essential functions of the position as related to the disability before determining a reasonable accommodation. Although the procedures in this Director's Order give detailed guidance, managers are encouraged to meet or exceed the requirements for reasonable accommodation and general access through innovative techniques.

4.1 D.O.16A— Training

Requirements:

In order to provide information to all employees concerning accessibility and reasonable accommodation, brief annual training sessions are required by this Director's Order at each Park/Office. These sessions may include identification of basic access requirements, a review of this Director's Order, or any other access information. These sessions may be accomplished by a variety of methods including technology-enhanced learning.

Findings:

The Zion Park Group Accessibility Coordinator provides accessibility training at the annual employee Life Fair.

Recommendations:

Continue to provide yearly training, include seasonal staff.

4.2 D.O.16A— VII. Specific Duties A. Equal Opportunity Program

Requirements:

EO staff at all levels are required to have expertise in the civil rights requirements related to reasonable accommodation, counseling, Alternative Dispute Resolution (ADR), complaint processing/ enforcement, and direct access to the highest administrative levels. They also required to have knowledge and access to technical resources within and outside of the NPS and the Department.

Findings:

Not verified. This program is included in the SETP for Park Administration and Concession Administration

Recommendations:

Provide training for EO staff.

4.3 D.O.16A— VII. Specific Duties D. Supervisors

Requirements:

Supervisors must:

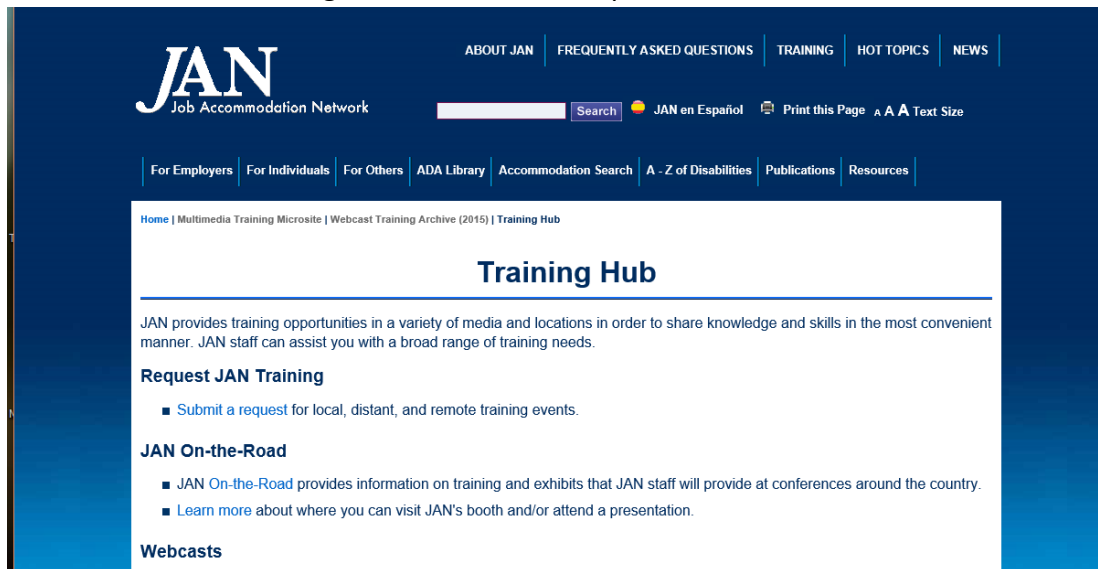
- Become knowledgeable of the reasonable accommodation guidance in order to comply with the necessary requirements. This includes general knowledge of the various types of disabilities, related terminology, and characteristics.
- Allow input by the applicant or employee in determinations related to reasonable accommodation.
- Avail themselves of the assistance provided by the HR, EO, and Accessibility Coordinators, at all levels, and attend the annual access training.
- Report, through the immediate HR office, all accommodation requests and final resolutions to the appropriate regional HR office verbally or in writing, indicating the type of disability, the reasonable accommodation, and date. The qualified individual will not be named. All such information must be delivered and maintained in the most confidential manner.

Findings:

Accessibility training is provided at the yearly Life Fair; specific supervisory training is not currently provided.

Recommendations:

Provide reasonable accommodation training for supervisors. Recommend utilizing askjan.org the Job Accommodation Network that specializes in this topic and provides free assistance in determining accommodations to provide:



4.4 D.O.16A— VII. Specific Duties E. Employees

Requirements:

All employees should be provided an opportunity to become familiar with the reasonable accommodation process and the basic access requirements. All employees have a responsibility to use proper terminology and etiquette when relating to employees, applicants, and visitors to create a hospitable work environment.

Findings:

Accessibility training is provided at the yearly Life Fair; specific training for all employees on reasonable accommodation is not provided.

Recommendations:

Continue yearly Life Fair training and provide yearly on-line training from askjan.org for all employees on reasonable accommodation.

4.5 D.O.16A— VII. Specific Duties F. Accessibility Coordinator

Requirements:

Accessibility Coordinators, who service one or more Park/Office, will provide specific guidance for structural and non-structural accessibility to applicants and employees. Accessibility Coordinators will also provide a brief annual update of selected parts of the "504

Self-Evaluation" and "Transition Plan" in order to establish work and budget priorities. The 504 Self-evaluation update includes structural and non-structural items, which need improvement. The Transition Plan update uses the structural aspects of the 504 Self-evaluation and assigns timetables, financial, and other resources for renovation of existing facilities. Both are crucial for responding to accommodation requests and achieving NPS Diversity and GPRA goals. Coordination with Department, contractors, and other Service offices for funding and other resources is essential.

Accessibility Coordinators must become knowledgeable about 504/ADA requirements for provision of reasonable accommodation and access design standards in order to provide guidance to supervisors and facility managers. Accessibility Coordinators must be able to provide basic formal and informal training for employees and management.

Findings:

The Zion Park Group Accessibility Coordinator is knowledgeable in Section 504 and ADA/ABA requirements, and regularly develops projects to increase access for visitors with disabilities.

Recommendations:

Provide an annual update of selected parts of this Self-Evaluation in order to establish work and budget priorities for structural and non-structural items, which need improvement. Continue to provide training and management support for the park Accessibility Coordinator.

4.6 D.O.16A—VIII. Requests for Reasonable Accommodation E. Structural Access

Requirements:

Structural access to NPS facilities affects both visitors and employees with disabilities. Structural access should generally be in place before the need arises. It is timely and much less expensive to provide structural access during initial or subsequent construction. For existing facilities, 504 regulations require a site evaluation and a Transition Plan in order to provide structural access before the need arises.

Immediate office and site Accessibility Coordinators (park coordinator) should accomplish a site evaluation at least once per year in order to update their respective site Transition Plans. A Transition Plan describes the structural modifications that are required for the removal of barriers for access. A transition plan should contain at least the following elements:

- A list of the physical barriers in the site's facilities that limit accessibility to its programs, activities, or services to individuals with disabilities;
- An outline of the methods to be utilized to remove these barriers;
- The time schedule for achieving compliance; and

- The name of the official responsible for the Plan’s implementation.

In addition, Accessibility Coordinators should be involved in the review and oversight of facility construction and or alterations to assist with compliance design issues.

Findings:

The park is meeting the requirements for a Self-evaluation and Transition Plan (SETP) for the major visitor use areas in the park with this document; the transportation system, park administration/employee areas, and concession administration are not included in this SETP.

Recommendations:

This SETP should be reviewed yearly and updated, and the park should complete the SETP’s for the areas not covered in this document.

5. Directors Order #42 Accessibility for Visitors with Disabilities in National Park Service Programs and Services

Directors Order #42 is out of date (sunset date 2004) and is currently being updated. This Order provides the best available information on roles and responsibilities for making the parks accessible (this section needs to be updated when new version is published)

5.1 D.O.42—VIII. Roles and Responsibilities - Superintendents

Requirements:

Each superintendent will be responsible for appointing a site accessibility coordinator and for providing the support and direction needed to develop and implement a park or site strategy to accomplish Service-wide goals and objectives regarding accessibility. A site accessibility coordinator may service more than one park or unit. The coordinator may be the same accessibility coordinator as appointed in Director's Order #16A: Reasonable Accommodation for Employees. Personnel issues may require that an individual from the Human Resources program be appointed to assist in the implementation of reasonable accommodation, in addition to the site access coordinator.

Findings:

The park has a designated accessibility coordinator

Recommendations:

Continue to provide training and management support for the Zion Park Group Accessibility Coordinator.

5.2 D.O.42—VIII. Roles and Responsibilities – Accessibility Coordinator

Requirements:

The park or site accessibility coordinator will be responsible for the coordination, planning, and monitoring of park-wide activities concerned with architectural and programmatic accessibility for people with disabilities, including technical assistance and training. Programs and activities should be closely coordinated with the regional accessibility coordinator to ensure actions taken conform to applicable laws, regulations, standards and policies. These programs and activities should also be closely coordinated with the Chiefs of Maintenance, Interpretation, Concessions Management and other program heads to ensure appropriate implementation. It is the responsibility of the park or site accessibility coordinator to advise park staff, with the approval of their supervisor and the superintendent, on actions necessary to achieve the goal of providing the highest level of accessibility that is reasonable within the park.

It is the responsibility of the park or site coordinator to work with their supervisor and the superintendent, in determining how best to achieve these duties for the benefit of the entire park.

Findings:

The park has a designated accessibility coordinator

Recommendations:

Continue to provide training and management support for the Zion Park Group Accessibility Coordinator.

6. *Other NPS Accessibility Policy and Procedures*

6.1 Service Animal Policy

Requirements:

On September 5, 2002, the NPS Director issued a memorandum updating policies and procedures for service animals in the National Parks.¹ This memorandum indicates that the National Park Service should follow the same guidelines and procedures for service animals as laid out in the Americans with Disabilities Act §35.136 Service animals. It provides specific

¹ Memorandum, Use of Service Animals by Persons with Disabilities in the National Park System, Fran P. Mainella, Director, September 5, 2002.

guidance on allowable questions that may be asked to verify that an animal is a service animal. The memorandum also indicates that it is the responsibility of each park superintendent to identify any areas closed to service animals and provide a justification for such closure such as “allowance of any domesticated animal would pose a direct threat to the health and safety of people or wildlife.”

Findings:

The park website requires visitors with service animals to check in at the VC before going on the trails. Typical visitors are allowed to go directly to trails from their vehicles.

Recommendations:

The park management team with natural and cultural resource specialists should determine if this requirement is necessary. Update compendium and website to use language from §35.136 Service animals.

6.2 Service Animal Policy §35.136 Service animals

(a) General. Generally, a public entity shall modify its policies, practices, or procedures to permit the use of a service animal by an individual with a disability.

(b) Exceptions. A public entity may ask an individual with a disability to remove a service animal from the premises if—

(1) The animal is out of control and the animal's handler does not take effective action to control it; or

(2) The animal is not housebroken.

(c) If an animal is properly excluded. If a public entity properly excludes a service animal under § 35.136(b), it shall give the individual with a disability the opportunity to participate in the service, program, or activity without having the service animal on the premises.

(d) Animal under handler's control. A service animal shall be under the control of its handler. A service animal shall have a harness, leash, or other tether, unless either the handler is unable because of a disability to use a harness, leash, or other tether, or the use of a harness, leash, or other tether would interfere with the service animal's safe, effective performance of work or tasks, in which case the service animal must be otherwise under the handler's control (e.g., voice control, signals, or other effective means).

(e) Care or supervision. A public entity is not responsible for the care or supervision of a service animal.

(f) Inquiries. A public entity shall not ask about the nature or extent of a person's disability, but may make two inquiries to determine whether an animal qualifies as a service animal. A public entity may ask if the animal is required because of a disability and what work or task the

animal has been trained to perform. A public entity shall not require documentation, such as proof that the animal has been certified, trained, or licensed as a service animal. Generally, a public entity may not make these inquiries about a service animal when it is readily apparent that an animal is trained to do work or perform tasks for an individual with a disability (e.g., the dog is observed guiding an individual who is blind or has low vision, pulling a person's wheelchair, or providing assistance with stability or balance to an individual with an observable mobility disability).

(g) Access to areas of a public entity. Individuals with disabilities shall be permitted to be accompanied by their service animals in all areas of a public entity's facilities where members of the public, participants in services, programs or activities, or invitees, as relevant, are allowed to go.

(h) Surcharges. A public entity shall not ask or require an individual with a disability to pay a surcharge, even if people accompanied by pets are required to pay fees, or to comply with other requirements generally not applicable to people without pets. If a public entity normally charges individuals for the damage they cause, an individual with a disability may be charged for damage caused by his or her service animal.

(i) Miniature horses.

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

(2) Assessment factors. In determining whether reasonable modifications in policies, practices, or procedures can be made to allow a miniature horse into a specific facility, a public entity shall consider—

(i) The type, size, and weight of the miniature horse and whether the facility can accommodate these features;

(ii) Whether the handler has sufficient control of the miniature horse;

(iii) Whether the miniature horse is housebroken; and

(iv) Whether the miniature horse's presence in a specific facility compromises legitimate safety requirements that are necessary for safe operation.

(3) Other requirements. Paragraphs 35.136 (c) through (h) of this section, which apply to service animals, shall also apply to miniature horses.

6.3 Audio-Visual Initiative

Requirements:

On October 20, 2006, the NPS Director issued a memorandum requiring that all of the films and audio-visual programs presented in our parks provide three basic services:

- open captions,
- audio-description, and
- assistive listening devices available for those with hearing loss.

Findings:

The parks films are open-captioned and audio described. Assistive listening systems are available for the film. The exhibit area has an audio described version available.

Recommendations:

Provide signage at the information desk and at theater spaces on assistive technology available.

6.4 NPS Complaint Process Directive

Requirements:

On September 5, 2008, the Equal Employment Opportunity Program Manager issued a directive to communicate the Section 504 requirements and process for complaints of discrimination filed by visitors to our sites. Park management and EO office should be knowledgeable on this process.

Findings:

All parks are required to follow this directive, should be reviewed by park staff yearly.

Recommendations:

Provide information on complaint process with annual EO training for staff.

6.5 Section 508

Section 508 standards apply to electronic and information technology procured by the federal government, including computer hardware and software, websites, phone systems, and copiers. They were issued under section 508 of the Rehabilitation Act, which requires access for both members of the public and federal employees to such technologies when developed, procured, maintained, or used by federal agencies.

Findings:

Electronic and information technology is a specialized requirement that WASO is developing standards for parks to use.

Recommendations:

Follow WASO and regional office guidance.

6.6 Mobility Device Policy

Requirements:

This requirement is defined explicitly in the ADA amendments act regulations promulgated by the U.S. Department of Justice. While these regulations do not apply to Federal entities, NPS has been advised by their legal counsel that Congress has stated that their intent is that the coverage of the ADA and Section 504 should be essentially the same. Thus, the national requirement relative to powered mobility should be based on §35.137 Mobility Devices of the title II ADA regulations and §36.311 Mobility Devices of the title III ADA regulations.

These regulations and guidance documents issued with the regulations make it clear that Segway-type devices, golf carts, scooters and other such devices must be allowed anywhere the public is allowed to go unless the organization can identify specific reasons for limiting one or more of these types of mobility devices in specific areas.

Currently, the NPS has not fully embraced the ADA language. Rather they have asked each park superintendent to “to review this issue by January 19, 2007, for their individual park and make a decision on whether they can accommodate the use of this device. If the decision is made that you can accommodate it, you must do so. If you determined that they will not be allowed, you must state in writing the reasons for that determination.”

Findings:

The Superintendents Compendium has use limits on where Segways can be used. These limits adhere to DOJ, Wilderness and NPS guidance.

Recommendations:

Edit Compendium to identify the accepted forms of identification for mobility devices. Recommend using language in § 35.137 to identify any restrictions. Provide staff training on mobility devices.

6.7 Mobility Device Policy - § 35.137 Mobility devices.

(a) Use of wheelchairs and manually-powered mobility aids. A public entity shall permit individuals with mobility disabilities to use wheelchairs and manually-powered mobility aids,

such as walkers, crutches, canes, braces, or other similar devices designed for use by individuals with mobility disabilities in any areas open to pedestrian use.

(b) (1) Use of other power-driven mobility devices. A public entity shall make reasonable modifications in its policies, practices, or procedures to permit the use of other power-driven mobility devices by individuals with mobility disabilities, unless the public entity can demonstrate that the class of other power-driven mobility devices cannot be operated in accordance with legitimate safety requirements that the public entity has adopted pursuant to § 35.130(h).

(2) Assessment factors. In determining whether a particular other power-driven mobility device can be allowed in a specific facility as a reasonable modification under paragraph (b)(1) of this section, a public entity shall consider—

- (i) The type, size, weight, dimensions, and speed of the device;
- (ii) The facility's volume of pedestrian traffic (which may vary at different times of the day, week, month, or year);
- (iii) The facility's design and operational characteristics (e.g., whether its service, program, or activity is conducted indoors, its square footage, the density and placement of stationary devices, and the availability of storage for the device, if requested by the user);
- (iv) Whether legitimate safety requirements can be established to permit the safe operation of the other power-driven mobility device in the specific facility; and
- (v) Whether the use of the other power-driven mobility device creates a substantial risk of serious harm to the immediate environment or natural or cultural resources, or poses a conflict with Federal land management laws and regulations.

(c)(1) Inquiry about disability. A public entity shall not ask an individual using a wheelchair or other power-driven mobility device questions about the nature and extent of the individual's disability.

(2) Inquiry into use of other power-driven mobility device. A public entity may ask a person using an other power-driven mobility device to provide a credible assurance that the mobility device is required because of the person's disability. A public entity that permits the use of an other power-driven mobility device by an individual with a mobility disability shall accept the presentation of a valid, State-issued, disability parking placard or card, or other State-issued proof of disability as a credible assurance that the use of the other power-driven mobility device is for the individual's mobility disability. In lieu of a valid, State-issued disability parking placard or card, or State-issued proof of disability, a public entity shall accept as a credible

assurance a verbal representation, not contradicted by observable fact, that the other power-driven mobility device is being used for a mobility disability. A “valid” disability placard or card is one that is presented by the individual to whom it was issued and is otherwise in compliance with the State of issuance’s requirements for disability placards or cards.

6.8 Emergency operations plan

The NPS Resource Management Reference Manual #77 Planning section, there is specific guidance on Emergency Management. Under roles and responsibilities, this guidance indicates that, “The superintendent is responsible for the preparation, approval, and implementation of the emergency operations plan and necessary action plans.”²

A comprehensive emergency operations plan should describe how and by whom decisions are to be made in order to maintain control over the incident. The plan presents a step-by-step process for dealing with emergencies. Adequate manpower and equipment should be identified. The emergency operations plan should outline responsibilities and contain a list of non-NPS resources.

Additional guidance on emergency management procedures is provided in DO/RM 50C, Visitor Safety; DO/RM 18, Wildland Fire Management; DO/RM 9, Law Enforcement Program; DO/RM 28, Cultural Resource Management; and DO/RM 51, Emergency Medical Services. See also in this Reference Manual, Hazardous Waste Management.

Findings:

MTC did not receive the emergency operations plan and necessary action plans from the park law enforcement or park management.

Recommendations:

ZION should develop an SOP for emergency operations. Survey staff. Sample questions:

- I know how to assist in a fire emergency at the park.
- We have accessible shelters for guests with disabilities in case of weather emergencies.
- In an emergency situation, such as a fire in the Park, what procedures are in place for notification, evacuation assistance, and transportation for people with disabilities?
- What type of emergency warning system does the Park utilize for providing prompt notification of emergencies to people with disabilities?

² NPS Resource Management Reference Manual #77, Emergency Management Roles and Responsibilities, <http://www.nature.nps.gov/Rm77/emergency.cfm>.

6.9 Standard Operating Procedures.

Utilize standard operating procedures (SOP’s) for maintenance operations, staff training, interpretive and recreational programming that affect access to these programs, services and activities.

Findings:

The park has many SOP’s for visitor center and visitor contact operations.

Recommendations:

The NPS should add accessibility accommodation best practices to existing SOP’s and develop SOP’s that cover accessibility topics. Preliminary outline of topics to cover:

NPS Accessibility Standard Operating Procedures	
<p>Maintenance SOP’s</p> <p>Facility</p> <ol style="list-style-type: none"> 1. Doors 2. Elevators and Lifts 3. Restrooms 4. Seating Areas 5. Group Gathering Areas 6. Theater 7. Information Desk <p>Hotels</p> <ol style="list-style-type: none"> 1. Accessible guest rooms 2. Front Desk <p>Exhibits</p> <ol style="list-style-type: none"> 1. Mechanical Components 2. Alternative Formats 3. Maneuvering Space 4. Lighting <p>Site</p> <ol style="list-style-type: none"> 1. Snow Removal 2. Signs and Pavement Markings 	<p>Training SOP’s</p> <ol style="list-style-type: none"> 1. Interpretive Staff 2. Maintenance Staff 3. Accessibility Coordinator 4. Law Enforcement 5. Ranger led programs 6. Concession Staff 7. Other <p>Interpretive Program SOP’s</p> <ol style="list-style-type: none"> 1. Ranger led programs 2. Concession led programs 3. Junior Ranger programs 4. Self-Guided programs <p>Recreational Program SOP’s</p> <ol style="list-style-type: none"> 1. Camping 2. Backcountry Camping 3. Picnicking 4. Hiking 5. River access (beach access routes) 6. Horseback Riding

<ul style="list-style-type: none"> 3. Accessible Routes 4. Trails 5. Outdoor Access Routes (Picnic Areas and Campgrounds) 6. Service Animals 7. Pet Relief Area <p>Transportation</p> <ul style="list-style-type: none"> 1. Shuttles 2. Shuttle Stops 3. Lifts 4. Signs and Pavement Markings 5. Accessible Routes 6. Bus Loading/Unloading Areas 7. Service Animals 8. Pet Relief Areas 	<ul style="list-style-type: none"> 7. Biking 8. Snowmobiles 9. Nature Walks 10. Overlooks <p>Emergency management Plan</p> <p>Other</p>
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