

REC-11 COMPLIANCE WITH ADA ASSESSMENT

1.0 EXECUTIVE SUMMARY

The REC-11 Compliance with Americans with Disabilities Act (ADA) Assessment, and the REC-9 Recreation Resources and Facility Inventory Assessment, were conducted as a single study effort. A field inventory of the recreation facilities in the study area to assess general facility condition and ADA guideline compliance was performed as the primary study element. Results of the ADA compliance assessment identified that three campgrounds, one picnic/day use area, and one boat ramp at Huntington Lake have been upgraded recently to provide disabled access. Other recreation facilities in the study area may have some accessible features but are not considered fully compliant in terms of all facility features. The results of the compliance assessment are presented in Table REC-11-1, a matrix of facility features evaluated at each recreation facility and the corresponding field data. This matrix will assist in the evaluation of the need, schedule, and party(ies) responsible for improvements to existing recreation facilities in order to achieve the appropriate level of ADA compliance in the study area.

2.0 STUDY OBJECTIVES

Assess ADA compliance at Project-induced recreational facilities. Develop a list of actions and a schedule to meet compliance on all Project-induced recreation facilities.

3.0 STUDY IMPLEMENTATION

3.1 STUDY ELEMENTS COMPLETED

The REC-11 Compliance with ADA Assessment study plan consists of eight main study elements. The study elements completed in 2002 include:

- Identification of recreation facilities in the Big Creek ALP Study Area that may be subject to ADA requirements;
- Reviewed existing information from the 1996 Sierra National Forest ADA accessibility surveys;
- Developed a protocol for conducting the ADA assessment using current Sierra National Forest protocols and comparing with protocols employed in 1996;
- Conducted the ADA assessment based on current protocols at all study area recreation facilities; and
- Identified facility features that do not comply with ADA accessibility standards.

3.2 OUTSTANDING STUDY ELEMENTS

Outstanding study elements include:

- A determination of the feasibility and desirability of re-designing or upgrading facilities, including identification of responsible parties;
- Develop a schedule for completion of needed repairs, modification, or replacement of recreation support facilities in order to achieve the appropriate level of ADA compliance; and
- Create a GIS database of survey data depicting ADA compliance at recreation facilities in the study area.

4.0 STUDY METHODOLOGY

The purpose of this study was to assess and characterize the existing ADA conditions at developed and dispersed recreation facilities in the Big Creek ALP Study Area. The first step was to develop a comprehensive list of recreation facilities in the basin. The Recreation Working Group (REC WG) then narrowed the list to include only those recreation facilities that were in the Big Creek ALP Study Area. The list of recreation facilities was approved by the REC WG in February 2001. The resulting list of recreation facilities, organized by the affiliated reservoir or forebay is included in Table REC-11-2. The types of facilities identified include boat ramps, campgrounds, picnic/day use areas, trailheads, and visitor/interpretive centers.

ADA laws and regulations were reviewed to determine the required level of compliance and facility features subject to ADA requirements. Resources for this review included the Rehabilitation Act of 1973, the Code of Federal Regulations regarding Department of Agriculture programs or activities, the Americans with Disabilities Act of 1990, the Americans with Disabilities Act Accessibility Guidelines (ADAAG), and the USDA Forest Service proposed Outdoor Developed Area Guidelines. At the time this study was conducted, the proposed Outdoor Developed Area Guidelines were held by the USDA-FS as the interim policy, though the public comment and official rulemaking processes were not complete. Subsequently, at the time this report was drafted the USDA-FS policy is to use only accessibility guidelines that have completed the rulemaking process, including the 1988 Uniform Accessibility Standards (UFAS) and the 1991 Americans with Disabilities Act Accessibility Guidelines (ADAAG), which do not provide detailed guidelines for outdoor areas. Nevertheless, this study serves the purpose of summarizing the overall perspective of the Project area facilities in terms of ADA compliance as well as the necessity of accessible facilities.

A review of the 1996 Sierra National Forest ADA Accessibility survey results was performed to evaluate the existing data and survey protocols. Through consultation in the REC WG, it was determined that the level of detail in the 1996 survey and protocols was more applicable to construction design evaluation and, therefore, unnecessary during this relicensing evaluation of existing facilities. Currently, the USDA-FS protocol for conducting ADA accessibility assessments is an interim policy based on the proposed Outdoor Developed Area Guidelines. When these guidelines become adopted as part of the ADA, they will become the official USDA-FS protocol.

The approach used in this study and agreed on by the REC WG was a more general screening level assessment of disabled accessibility at existing recreation facilities and related facility elements. This approach was considered more appropriate for the planning stage of the Big Creek ALP. Following the planning stage of this process will be a construction design evaluation conducted by landscape architects and engineers, if needed, to develop a scope of work and schedule of implementation which would achieve the appropriate level of accessibility in the Project area.

The Compliance with ADA Assessment was conducted in coordination with the Recreation Resources and Facility Inventory Assessment (REC-9). Two forms were developed for use during the field assessment including the Recreation Facility Inventory Form (inventory form) and the Recreation Facility Condition Assessment Form (condition form). The forms were approved by the REC WG in September 2002. Use of the forms for the Recreation Resources and Facility Inventory Assessment is described in the REC-9 study report. Use of the condition form in the Compliance with ADA Assessment is described below.

The condition form has an inventory table to record details of the features of each recreation facility and an area below the table to write in comments regarding the overall facility assessment. The columns of the inventory table tracked the following data: facility features; type/description; quantity; facility condition; and ADA condition (divided into site slope, approach slope, restrooms, and water supply). The site slope and approach slope were recorded as either excessive (E), moderate (M), slight (S), or level (L) for recreation facility features as appropriate. Level slopes were very close or equal to 0% slope, slight slopes were less than 5%, moderate slopes were around 5-6%, and excessive slopes were greater than 6%. An electronic level was used to measure slopes until the surveyors were comfortable making visual estimates of the slope categories. Restrooms were identified as either unsuitable (U) for access or potentially (P) meeting access requirements. Water systems were evaluated for a plumbed or multiple spigot system (P), single water spigot (S), and accessibility (A). Below the inventory table, notes were made on the facility in the following five categories: overall condition; ADA condition; environmental and cultural resource concerns; health and safety concerns; and comments. An example of the condition form is included in Appendix A.

The compliance with ADA assessment was conducted in September, 2002. All working group participants were invited to participate in the field assessment process. The assessment began collaboratively with ENTRIX, SCE and USDA-FS personnel participating. The first day of inventory and assessment was completed at sites around Huntington Lake. The participating parties agreed upon the appropriateness of the process and level of detail obtained during the first day of field work. ENTRIX personnel evaluated the rest of the sites, with SCE participating in the Shaver Lake area and the USDA-FS participating at Mammoth Pool. Walking surveys of each facility were conducted including notes and data recorded on the appropriate forms, and photos taken of specific facility features as necessary. The data recorded included an inventory of the recreation support features and a general assessment of the features' accessibility for disabled persons.

Campsites and picnic sites were assessed for slopes within and leading to the sites. During the field assessment, the site slopes were recorded for the facility as a whole. Variations between sites were documented by recording multiple slope values (i.e., L/S or S/M). In some cases, clusters of sites in one area of a facility with level or slight slopes may have been noted as an area of potential accessibility. Tables were assessed for style (approved ADA style such as those at the compliant facilities at Huntington Lake – Deer Creek, Catavee, and Kinnikinnick Campgrounds and Bear Cove Picnic Area, or non-ADA standard wood style tables) and in some cases the site slope in which they are placed. Pedestrian paths and trails were assessed for surface type (paved, dirt, wood/boardwalk) and slope. Restrooms were assessed for accessibility (based on presence of ADA placards and visual assessment of the structure's compliance with current guidelines) and in some cases approach slope. Recreation facility entrance signs and information boards, as well as informational kiosks or displays were evaluated for access (no barriers obstructing approach) and approach slope. Water supply/spigots were examined for accessible controls and approach slope. Trash/recycling facilities, boat ramps, docks, and buildings were assessed only for approach slopes. Facility features included under "Other" were observed for accessibility based on the style or function of the feature.

The reason for assessing the site slope and approach slope of features at the recreation facilities is that slope is a limiting factor in access for mobility impaired persons. Classifying the slopes into categories ranging from level to excessive for each feature provides an overall impression of the slope characteristics at each facility. If slopes are rated either moderate or excessive at a particular facility, the feasibility of providing access at the facility will be determined during the detailed construction design evaluation.

5.0 STUDY RESULTS AND ANALYSIS

The requirement for ADA compliance stems from the Rehabilitation Act of 1973 which, in section 504, prohibits discrimination on the basis of disability in programs conducted by Federal agencies and programs receiving Federal financial assistance. Each Federal agency has its own set of section 504 regulations to enforce the Rehabilitation Act. The Forest Service regulations, under the Department of Agriculture, are found in 7 CFR Parts 15b and 15e. These regulations direct that each program or activity, when viewed in its entirety is readily accessible to and usable by individuals with handicaps. In 1990, the Americans with Disabilities Act was passed to ensure equal opportunity for persons with disabilities in public accommodations, as well as employment, state and local government services, commercial facilities, and transportation. From the ADA of 1990 came standards for accessible design in places of public accommodation and other facilities (ADA Accessibility Guidelines – ADAAG). These standards pertain mainly to buildings and similar facilities. In 1999, a report on Accessibility Guidelines for Outdoor Developed Areas was prepared by the Outdoor Developed Areas Regulatory Negotiation Committee, which the Access Board created for this purpose. The guidelines provide new construction and alteration scoping and technical criteria and addresses unique constraints specific to outdoor environments. These guidelines were considered, for

a period of time, the interim policy to be used for all aspects of planning, designing, inventorying, and monitoring of Forest Service (a member of the Regulatory Negotiation Committee) recreation facilities, site furnishings, and trails, although not yet approved in the rulemaking process. Currently, these guidelines are no longer being used in the Sierra National Forest, pending final approval. During future facility design and construction processes, the latest available ADA accessibility guidance will be reviewed to ensure compliance with current regulations. More information about the legislation and regulations described above can be found at: www.usdoj.gov/crt/ada/cguide.htm (Section 504 of the Rehabilitation Act); www.fs.fed.us/recreation/programs/accessibility/7CFR15e.htm (USDA-FS section 504 regulations); www.ada.gov (Americans with Disabilities Act of 1990); and www.access-board.gov/indexes/accessindex.htm (ADAAG and Outdoor Developed Area Guidelines).

The on-site ADA compliance assessment of recreation facilities in the study area was conducted from September 17 to 20, 2002. The surveys resulted in a comprehensive list of recreation features assessed at each facility and the ADA compliance status and/or site and approach slopes of each feature. This information is presented in Table REC-11-1 organized by associated reservoir or forebay. A discussion of the ADA assessment for each of the facility features is discussed below.

Three campgrounds, one-day use area, and one boat ramp facility, all at Huntington Lake, were found to be fully compliant with ADA accessibility guidelines. Deer Creek, Catavee, and Kinnikinnick campgrounds, and the Bear Cove/Deer Creek picnic area (day use area) have been renovated to include level to slightly sloped sites and approaches and compliant facility features such as restrooms, tables, water spigots, and parking areas. The Bear Cove side of the picnic area doesn't have an accessible restroom but is connected to the Deer Creek campground by a paved pedestrian path. The USDA-FS Huntington Lake Boat Ramp area is equipped with level, accessible parking areas, accessible restrooms, and an ADA boat-loading ramp. Other recreation facilities in the Big Creek ALP Study Area have varying levels of accessible features, as shown in Table REC-11-1.

Copies of the condition forms used in the field during the REC-9 Recreation Resources and Facility Inventory Assessment and REC-11 Compliance with ADA Assessment studies are included as an appendix to the REC-9 study report. During the field assessment, photos were taken of some recreation facility features to document feature condition and ADA accessibility. Selected photos portraying both ADA style and non-compliant facility features are included as Appendix B.

TABLES

Table REC-11-1. Accessibility of Features at Recreation Facilities in the Big Creek ALP Study Area

Facility Name	Type of Facility						Facility Features														
	Developed Campground	Primitive Campground	Picnic Area/Day Use	Trailhead/Trail	Boat Ramp/Marina	Interpretive Center	Campsite Slope	Picnic Site Slope	Tables	Pedestrian Paths/Trails	Parking	Restroom	Signage	Water Supply/Spigots	Trash/Recycling Facilities	Boat Ramp	Docks	Buildings	Other:	Other:	Other:
Vermilion Valley Dam and Reservoir																					
Trailhead - Bear Creek				X								Y									
Trailhead - Bear Ridge				X						N	N	N									
Trailhead - Mono Creek Trail				X						N	N	Y									

KEY: Y=accessible feature; N=not accessible; L=level slope; S=slight slope; M=moderate slope; E=excessive slope; P=paved path; D=dirt or gravel path; W=wood/boardwalk

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Florence Lake Dam and Reservoir																					
Boat Ramp - Florence Lake					X					N	N				S/M						
Florence Lake Picnic Area			X	X			L/S	N		N	N		S	S							
Jackass Meadow Campground	X						L/S	N	W L/S		N	Y L	N L/S	L/S							
Trailhead - Dutch/Crater			X	X			L/S	N		N	N		S	S							

KEY: Y=accessible feature; N=not accessible; L=level slope; S=slight slope; M=moderate slope; E=excessive slope; P=paved path; D=dirt or gravel path; W=wood/boardwalk

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Huntington Lake Dams and Reservoir																					
Bear Cove Picnic Area / Deer Creek Picnic Area			X				L/S	Y	P S	Y	N	Y L	N S	S							
Billy Creek Campground	X						L/M	N L/M			N	N M	N S/M	S/M							
Billy Creek Guard Station Museum					X					N							S				
Billy Creek Picnic Area			X				S/M	N S/M		N		N M	N M								
Boat Ramp - Huntington Lake Resort					X					N					S/M	S/M	S/M				
Boat Ramp - Huntington Lake USFS					X				D S/M	N	Y	Y/N L/S	N L	L/S	S	S		Y			
Catavee Campground	X						L/S	Y	P S	Y	Y	N M	Y S	L/S							
College Campground	X						L/S	N	D S/M		N	Y L/S	N L/S	L/S							
Dam 3 Parking Area			X							N											
Deer Creek Campground	X						L/S	Y	P S		Y	Y L	Y S/M	L							
Dowville Picnic Area			X				S/M	N	D S	N S/M	N	S/M									
Eastwood Overflow Campground		X																			
Eastwood Visitor Center					X			N	D S	N S/M	N	Y S		L/S							
Kinnikinnick Campground	X						L/S	Y		Y L/S	Y	N M	Y S/M	L/M							
Lower Billy Creek Campground	X						L/S	N	D S		N	Y L	N L	L							
Rancheria Campground	X						S/M	N	D S/M	N S/M	Y	Y S	N S/M	S/M							
Trailhead - Billy Creek				X						N S		Y									

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Mammoth Pool Dam and Reservoir																					
Boat Ramp - Mammoth Pool					X					N	N M	S		S	M						
China Bar Boat Campground	X						N	N			N	N							N		
Mammoth Pool Campground	X						S/M	N			N S	N S/M	N	S							
Trailhead - Logan Meadow				X								Y M									
Windy Point Picnic Area			X								N S										

KEY: Y=accessible feature; N=not accessible; L=level slope; S=slight slope; M=moderate slope; E=excessive slope; P=paved path; D=dirt or gravel path; W=wood/boardwalk

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Moderate Diversion Dams and Forebays																					
Bear Creek Diversion Dam and Forebay																					
Bear Creek Trailhead at Forebay				X									E								
Mono Creek Diversion Dam and Forebay																					
Mono Creek Campground	X						L/S		N			N	Y L	N L/S							
Mono Creek Overflow Campground		X										N	N S								
Mono Creek Picnic Area			X					L/S	N			N									
Portal Dam and Forebay																					
Portal Forebay Campground	X						S/M		S			N	Y L/S								
Trailhead - Mono Crossing				X								N	N S								
Balsam Dam and Forebay																					
Balsam Forebay Picnic Area			X	X								N	N								
Trailhead - Balsam Meadow			X	X								N	N								
San Joaquin River Dam 6 and Forebay																					
Dam 6 Forebay Fisherman Access			X																	N	

KEY: Y=accessible feature; N=not accessible; L=level slope; S=slight slope; M=moderate slope; E=excessive slope; P=paved path; D=dirt or gravel path; W=wood/boardwalk

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Shaver Lake Dam and Reservoir																					
Boat Ramp - Camp Edison					X					N		Y		S	S						
Boat Ramp - Sierra Marina					X					Y	N	Y		L	S/M	L					
Camp Edison	X		X				L/M	L/M	N	Y	Y	Y	N	S			S				
Day Use Areas on North Shore			X					L/E	N	Y	N			S/M							
Dorabelle Campground	X						L/M		N	N	N	N	N	L/M							
Dorabelle Picnic Area			X					L/M	N	P/D	N	N		S							
Rest Area off Dinkey Creek Road			X							L/S	S										
Shaver Lake Point Day Use Area			X		X	X				Y	N	Y		L/S		M/E					
Sierra Marina Parking Area					X					Y	N	Y	N						Y		

KEY: Y=accessible feature; N=not accessible; L=level slope; S=slight slope; M=moderate slope; E=excessive slope; P=paved path; D=dirt or gravel path; W=wood/boardwalk

Table REC-11-2. List of Recreation Facilities ⁽¹⁾ by Reservoir and Forebay

<i>Florence Lake Dam & Reservoir</i>	
Boat Ramp - Florence Lake	Florence Lake Picnic Area
Jackass Meadow Campground	Trailhead - Dutch/Crater Trail
<i>Vermilion Valley Dam & Reservoir ⁽²⁾</i>	
Trailhead - Bear Creek (at Kaiser Pass Rd. near Mono Creek Campground)	
Trailhead - Bear Ridge	Trailhead - Mono Creek Trail
<i>Huntington Lake Dams 1, 2, 3, 3a, & Reservoir</i>	
Bear Cove/Deer Creek Picnic Area	Billy Creek Cabin/Guard Station Museum
Billy Creek Campground	Billy Creek Picnic Area
Boat Ramp - Huntington Lake (USDA-FS)	Boat Ramp - Huntington Lake Resort
Catavee Campground	College Campground
Dam 3 Parking Area	Deer Creek Campground
Dowville Picnic Area	Eastwood Overflow Campground
Eastwood Visitor Center	Kinnikinnick Campground
Lower Billy Creek Campground	Rancheria Campground
Trailhead - Billy Creek	
<i>Shaver Lake Dam & Reservoir</i>	
Boat Ramp - Camp Edison (Shaver Lake Marina)	Boat Ramp - Sierra Marina
Camp Edison (SCE)	Day Use Areas on North Shore (Rd. 1 & 2, & Eagle Point Picnic Areas)
Dorabelle Campground	Dorabelle Picnic Area
Rest Area off Dinkey Creek Road	Shaver Lake Point Day Use Area
Sierra Marina Parking Area	
<i>Mammoth Pool Dam & Reservoir</i>	
Boat Ramp - Mammoth Pool	China Bar Boat Campground
Mammoth Pool Campground	Trailhead - Logan Meadow
Windy Point Picnic Area	
<i>Bear Creek Diversion Dam & Forebay</i>	
Bear Creek Trailhead at Forebay	
<i>Mono Creek Diversion Dam & Forebay</i>	
Mono Creek Campground	Mono Creek Overflow Campground
Mono Creek Picnic Area	
<i>Portal Dam & Forebay ⁽³⁾</i>	
Portal Forebay Campground	Trailhead - Mono Crossing
<i>Balsam Dam & Forebay</i>	
Balsam Forebay Picnic Area	Trailhead - Balsam Meadow
<i>San Joaquin River Dam 6 & Forebay</i>	
Dam 6 Forebay Fisherman Access	

(1) This list was developed and approved by the Recreation Working Group in February 2002.

(2) Vermilion Valley facilities are in the Traditional Licensing Process.

(3) Portal Project facilities are in the Traditional Licensing Process.

APPENDIX A

Recreation Facility Condition Assessment Form

APPENDIX A. Recreation Assessment Form

**Southern California Edison Big Creek ALP
Recreation Facility Inventory Assessment Form**

Recreation Facility Name: _____ Date: _____ Surveyor Name: _____

	Facility Features	Type/Description	Quantity	Facility Condition (E/G/F/P) - # of total	ADA Condition			
					Site Slope (E/M/S/L)	Approach Slope (E/M/S/L)	Restrooms (U/P)	Water Supply (P/S/A)
1								
2								
3								
4								
5								

Overall Facility Assessment

Condition:
ADA Condition:
Environmental and Cultural Resource Concerns:
Health and Safety Concerns:
Comments:

APPENDIX A. Recreation Assessment Form (continued)

Facility Inventory Form - Directions for Use:

At each recreation facility (campground, picnic area, boat ramp, etc.), first walk through the site with the level one form and check boxes corresponding with features observed at the facility. Use this populated checklist as a cross-reference tool to ensure that each feature of the facility is addressed on the Facility Inventory Form. Look for additional features not listed on the level one form that should be included in the inventory.

Facility Condition - Definitions

E - Excellent	Facility appears new, unweathered, and free of damage or defect.
G - Good	Facility in working condition, some weathering or superficial damage.
F - Fair	Facility is useable but has structural damage, defect, or deterioration. May have been temporarily fixed or modified to remain functional.
P - Poor	Damage or defect of magnitude that impedes use of feature.

ADA Conditions

Slope of site or approach	E - Excessive
	M - Moderate
	S - Slight
	L - Level
Restrooms	U - unsuitable due to size of stall, approach, access, etc.
	P - potentially suitable to meet accessibility needs based on visual assessment; measurement required to confirm
Water Systems	P - plumbed throughout facility, multiple spigots
	S - Single water spigot
	A - Accessible controls (can be operated with closed fist)

APPENDIX B

Selected Photos of ADA Style and Non-Compliant Recreation Facility Features

APPENDIX B. Photos of ADA Style and Non-Compliant Recreation Facility Features



Boat Ramp – Huntington Lake (USDA-FS), Parking Area Restroom – ADA Compliant



Boat Ramp – Huntington Lake (USDA-FS), Parking Area Restroom Stall – ADA Compliant

APPENDIX B. Photos of ADA Style and Non-Compliant Recreation Facility Features (continued)



Boat Ramp – Huntington Lake (USDA-FS), Beach Area Restroom Stall – ADA Compliant



Rancheria Campground, Typical USDA-FS Pit Toilet Facility – Non-ADA Compliant

APPENDIX B. Photos of ADA Style and Non-Compliant Recreation Facility Features (continued)



Rancheria Campground, Inaccessible Restrooms



Boat Ramp – Mammoth Pool, Restroom – ADA Identified, but Questionable Accessibility

APPENDIX B. Photos of ADA Style and Non-Compliant Recreation Facility Features (continued)



Deer Creek Campground, Water Spigot – ADA Compliant Design



Rancheria Campground, Water Spigot – Non-ADA Compliant Design

APPENDIX B. Photos of ADA Style and Non-Compliant Recreation Facility Features (continued)



Mammoth Pool Campground, Water Spigot and Restroom – Non-ADA Compliant Features



Catavee / Kinnikinnick Campgrounds, Water Spigot - ADA Design, but Inaccessible

APPENDIX B. Photos of ADA Style and Non-Compliant Recreation Facility Features (continued)



Deer Creek Campground, Design Tables and Campsites – ADA Compliant



Catavee/Kinnikinnick Campgrounds, Campsite Created with Retaining Walls – ADA Compliant

APPENDIX B. Photos of ADA Style and Non-Compliant Recreation Facility Features (continued)



Mono Creek Campground – Example Area Suitable for ADA Compliance



Bear Cove/Deer Creek Picnic Area – ADA Compliant

APPENDIX B. Photos of ADA Style and Non-Compliant Recreation Facility Features (continued)



Dowville Picnic Area – Non-ADA Compliant



Deer Creek Campground, Paved Pedestrian Path – ADA Compliant

APPENDIX B. Photos of ADA Style and Non-Compliant Recreation Facility Features (continued)



Boat Loading Ramp, Sierra Marina - ADA Compliant



Boat Loading Ramp, Huntington Lake (USDA-FS) - ADA Compliant

APPENDIX B. Photos of ADA Style and Non-Compliant Recreation Facility Features (continued)



Shaver Lake Watersports Marina at Shaver Lake Point – Inaccessible Facility



Trailhead, Bear Ridge – Inaccessible Facility

APPENDIX B. Photos of ADA Style and Non-Compliant Recreation Facility Features (continued)



Billy Creek Campground, USDA-FS Information Boards – Inaccessible Feature