

Americans with Disabilities Act (ADA) Draft Transition Plan
City of Golden, Colorado
December 20, 2022



City of
Golden

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1.0 Introduction

The City of Golden (the City), to complete an evaluation of its continuous efforts to comply with Title II of the Americans with Disabilities Act (ADA) and develop an ADA Transition Plan, retained the services of Meeting the Challenge, Inc., A CP&Y Company (MTC), in September 2018. This Transition Plan will report the processes in its development and lay out the steps required, including a schedule of remediation projects, to ensure compliance with Title II of the ADA. This document is the result of the efforts initiated by that agreement.

1.1 Transition Plan Need and Purpose

The [Americans with Disabilities Act \(ADA\)](#) is a civil rights law prohibiting discrimination against individuals based on disability. It was enacted July 26, 1990 and amended in 2008 with the ADA Amendments Act. The ADA consists of five titles outlining protections in the following areas:

- I. Employment
- II. State and local government services
- III. Public accommodations
- IV. Telecommunications
- V. Miscellaneous provisions

Title II of ADA pertains to the programs, activities and services provided by public entities. The City of Golden must comply with this section of the Act as it specifically applies to public service agencies. Title II of ADA states that “no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such entity.” ([42 USC Sec. 12132](#); [28 CFR Sec. 35.130](#))

As required by Title II of ADA (28 CFR Part 35 [Sec. 35.105](#) and [Sec. 35.150](#)), the City has conducted a self-evaluation of its services, programs, activities, and facilities on public property; and has developed this Transition Plan detailing the methods to be used to ensure compliance with ADA program accessibility requirements.

1.2 ADA and its Relationship to Other Laws

Title II of ADA is companion legislation to two previous federal statutes and regulations—the [Architectural Barriers Act \(ABA\) of 1968](#) and [Section 504 of the Rehabilitation Act of 1973](#)—as well as the much newer [Colorado HB21-1110](#).

The Architectural Barriers Act of 1968 is a federal law that requires facilities designed, built, altered, or leased with federal funds to be accessible. The Architectural Barriers Act marks one of the first efforts to ensure access to the built environment.

Section 504 of the Rehabilitation Act of 1973 is a federal law that protects qualified individuals from discrimination based on their disability. The nondiscrimination requirements of the law apply to employers and organizations that receive financial assistance from any federal department or

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agency. Title II of ADA extended this coverage to all state and local government entities, regardless of whether they receive federal funding or not.

Colorado HB 21-1110, signed in July 2021, requires by law that all state and local public entities meet the most recent Website Content Accessibility Guidelines (WCAG) by July 1, 2024. This law provides concrete guidelines for digital accessibility requirements by setting WCAG, published and updated by the Web Accessibility Initiative (WAI) of the World Wide Web Consortium (W3C), as the official standard of success for all government agencies.

1.3 City Requirements

Under Title II, the City must meet these general requirements:

- Must operate their programs so that, when viewed in their entirety, the programs are accessible to and useable by individuals with disabilities [\[28 CFR Sec. 35.150\]](#).
- May not refuse to allow a person with a disability to participate in a service, program or activity simply because the person has a disability [\[28 CFR Sec. 35.130\(a\)\]](#).
- Must make reasonable modifications in policies, practices and procedures that deny equal access to individuals with disabilities unless a fundamental alteration in the program would result [\[28 CFR Sec. 35.130\(b\)\(7\)\]](#).
- May not provide services or benefits to individuals with disabilities through programs that are separate or different unless the separate or different measures are necessary to ensure that benefits and services are equally effective [\[28 CFR Sec. 35.130\(b\)\(iv\) & \(d\)\]](#).
- Must take appropriate steps to ensure that communications with applicants, participants and members of the public with disabilities are as effective as communications with others [\[28 CFR Sec. 35.160\(a\)\]](#).
- Must designate at least one responsible employee to coordinate ADA compliance [\[28 CFR Sec. 35.107\(a\)\]](#). This person is typically referred to as the ADA Coordinator. The public entity must provide the ADA Coordinator's name, office address, and telephone number to all interested individuals [\[28 CFR Sec. 35.107\(a\)\]](#).
- Must provide notice of ADA requirements. All public entities, regardless of size, must provide information about the rights and protections of Title II to applicants, participants, beneficiaries, employees, and other interested persons [\[28 CFR Sec. 35.106\]](#). The notice must include the identification of the employee serving as the ADA Coordinator and must provide this information on an ongoing basis [\[28 CFR Sec. 35.107\]](#).
- Must establish a grievance procedure. Public entities must adopt and publish grievance procedures providing for prompt and equitable resolution of complaints [\[28 CFR Sec. 35.107\(b\)\]](#). This requirement provides for a timely resolution of all problems or conflicts related to ADA compliance before they escalate to litigation and/or the federal complaint process.
- Must develop a transition plan. Although Title II does not necessarily require the City to make each of its facilities accessible, Title II does require the City to develop a transition plan identifying physical barriers that must be removed to achieve program accessibility [\[28 CFR Sec. 35.150\(d\)\]](#).

2.0 Self-Evaluation

2.1 Overview

Under Title II of the ADA ([28 CFR Sec. 35.105](#)), public entities are required to perform a self-evaluation of their current services, policies, and practices with regard to accessibility. The goal of the self-evaluation is to verify that, in managing its programs and facilities, the City is providing accessible access and not adversely affecting the full participation of individuals with disabilities.

The intent of this ADA self-evaluation is to review the City's entire public program and services, including all facilities on public property, to identify any obstacles or barriers to program accessibility that need to be addressed. The general categories of items to be evaluated include:

- Services, programs, and activities – including any policies, practices, procedures, ordinances, or qualification criteria that exclude, or might exclude, qualified people with disabilities.
- Building Facilities – these include offices, garages, and other types of buildings.
- Park Facilities – these include the golf course, cemetery, and sports complexes.
- Pedestrian facilities in the public right-of-way [excluded from the scope of this Transition Plan].
- Digital services, including all websites maintained by the City and all digital properties such as videos and online documents.

Public entities are required to provide an opportunity for interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the self-evaluation process by submitting comments [[28 CFR Sec. 35.105\(b\)](#)].

Furthermore, a public entity that employs 50 or more persons is required, for at least three years following the completion of the self-evaluation, to maintain on file and make available for public inspection:

- A list of the interested persons consulted;
- A description of areas examined, and any problems identified; and,
- A description of any modifications made.

2.2 Process & Findings

Between August 2018 and June 30, 2022, the City completed a self-evaluation of its services, programs, activities, and facilities on public property to assess accessibility of its services, programs, and activities. Reports and findings from this review are provided in Appendix A under the headings of self-evaluation (A1) Summary Report: ADA Policy Review; (A2) Summary Report: Management Participation; (A3) Summary Report: ADA Knowledge Survey; and (A4) Summary Report: Digital Accessibility/Website Assessment.

An important component of the self-evaluation process is the identification of obstacles or barriers to accessibility, and the corresponding modifications that will be needed to remedy these items. The

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following sections provide a summary of improvements that have already been made, and obstacles that the City plans to address as part of this Transition Plan. The City is allowed to ensure program access through methods and means other than structural or architectural barrier removal. However, where structural changes to facilities must be completed to achieve program accessibility, the City must develop a Transition Plan listing the steps necessary to complete such changes. While an original Transition Plan was required within six months of January 26, 1992, it is prudent for the City to update and maintain its Transition Plan to ensure that facilities that have been built, renovated, purchased, or leased in the interim have not introduced new barriers. Similarly, as the City has created, moved, expanded, or changed its services, programs, and activities since 1992, it is wise to evaluate programs and facilities to ensure ongoing compliance.

2.3 ADA Policy Review

Title II regulations explicitly require the City to provide public notice of ADA compliance, name an employee(s) to coordinate its effort to comply with the ADA, and establish an ADA complaint procedure.

2.3.1 Public Notice

The City's [public notice](#) is provided in Appendix E.

2.3.2 Designation of Responsibility

In accordance with [28 CFR Sec. 35.107\(a\)](#), the City has designated the following person to serve as [ADA Title II Coordinator](#), to oversee the City's policies and procedures:

Anne Beierle, Public Works Director

In addition, per [28 CFR Sec. 35.150\(d\)\(3\)](#), the City has designated the following person to serve as ADA Transition Plan Implementation Coordinator, to monitor the City's progress and manage review and updates of this document:

Alex Mansfield, Management Analyst.

Contact information is provided in Appendix F.

Training is an important tool for ensuring compliance with ADA requirements. The ADA Coordinator will identify resources and opportunities for public employees at various levels to receive ADA-related training appropriate to their job functions.

2.3.3 Grievance Procedure

If users of the City's facilities and services believe the City has not provided a reasonable modification in policy or practice, they have the right to file a grievance. In accordance with [28 CFR Sec. 35.107\(b\)](#), the City has developed a [grievance procedure](#) for the purpose of the prompt and equitable

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resolution of citizens' complaints or concerns. This grievance procedure is outlined in Appendix E.

2.3.4 Additional Policies Recommended

ADA consultant, MTC, reviewed existing city ADA-related policies. Recommendations were made for improvement of these policies. Templates for additional policies aligned with the various prohibitions and requirements in ADA regulations were provided to the City. Publication of these policies and posting to the city website ensure that the public is aware of the civil rights protected by the ADA.

To ensure that city staff have formal guidance and to ensure city services, programs, and activities are inclusive of qualified people of all abilities, the City has adopted the additional policies below specific to requirements and prohibitions of discrimination listed in the Title II regulations:

- [ADA Contracting Policy](#)
- [ADA Effective Communication Policy](#)
- [ADA Emergency Management Plan Development Policy](#)
- [ADA Equal Employment Policy](#)
- [ADA General Program Access Policy](#)
- [ADA Information Technology Accessibility Policy](#)
- [ADA Mobility Device Policy](#)
- [ADA Nondiscriminatory Eligibility Criteria Policy](#)
- [ADA Reasonable Accommodation Policy](#) (Employment)
- [ADA Self-Evaluation Policy](#)
- [ADA Service Animal Policy](#)
- [ADA Ticketing Policy](#)
- [ADA Transportation Access Policy](#)

A report summarizing comments and recommendations regarding the City's ADA policies is provided in Appendix A1.

2.4 Management Participation

To better understand the extent of the City's services, programs, and activities, ADA consultant, MTC, conducted interviews with the heads of city departments. These discussions identified the approaches that each department takes to ensure that delivery of its programs does not discriminate based on disability. Discussions addressed potential physical barriers to program access and other means by which departments ensure that they provide for effective communication, reasonable modification of policies and practices, and the elimination of criteria that might prevent access to their services and programs. A report summarizing the observations and conclusions of the interviews is provided in Appendix A2.

2.5 ADA Knowledge Survey

In May 2019, a survey of city staff was completed to assess needs for knowledge of ADA requirements to ensure that city employees acknowledge and protect the civil rights of qualified

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people of all abilities in accessing city services, programs, and activities. Though slightly less than 40 percent of city employees participated in the online survey, the results were sufficient to identify those areas where staff have the most questions about the ADA, and where training would most benefit targeted groups of employees. A summary of the survey results, conclusions, and recommendations is provided in Appendix A3.

2.6 Digital Accessibility

As part of the City's self-evaluation process, its main website and other digital communications/documents were audited and tested for accessibility and usability. The process included comparison of random webpages with success criteria of the Web Content Accessibility Guidelines (WCAG 2.0) and enlisting people with various disabilities to test access to and functionality of the City's primary website (www.cityofgolden.net) with or without assistive technology. There may be some instances where the ability to make programs accessible through virtual means might eliminate the need to make structural changes to facilities to achieve program access. Elimination of virtual barriers to achieve program access for some programs may cost less and be more quickly implemented than the physical/structural alterations that might be needed to make those programs accessible in real-world facilities.

A summary report of the findings, observations, and recommendations for accessibility improvements to the City's primary website are provided in Appendix A4.

2.7 Equally Effective Communication

The City must ensure that people with sensory and speech disabilities can participate in public meetings and interact with city government, including, but not limited to, the opportunity to request city services, and understand and interact with city staff and elected officials. Title II of ADA includes the following requirements regarding communications:

2.7.1 General ([28 CFR Sec. 35.160](#))

- A public entity shall take appropriate steps to ensure that communications with applicants, participants, and members of the public with disabilities are as effective as communications with others.
- A public entity shall furnish appropriate auxiliary aids and services where necessary to afford an individual with a disability an equal opportunity to participate in, and enjoy the benefits of, a service, program, or activity conducted by a public entity.
- A public entity shall give primary consideration to the requests of the individual with disabilities in determining what type of auxiliary aid and service is necessary,.

The City must give primary consideration to the requests of individuals with disabilities when providing auxiliary aids and services. Auxiliary aids and services include, but are not limited to, sign language interpreters, video remote interpreting, real-time captions on live meetings and streamed video, large print and braille documents, screen-reader software, optical readers, screen

magnification, and accessible websites and applications.

2.7.2 Information and Signage ([28 CFR Sec. 35.163](#))

- A public entity shall ensure that interested persons, including persons with impaired vision or hearing, can obtain information as to the existence and location of accessible services, activities, and facilities.
- A public entity shall provide signage at all inaccessible entrances to each of its facilities, directing users to an accessible entrance or to a location at which they can obtain information about accessible facilities. The international symbol for accessibility shall be used at each accessible entrance of a facility.

Signs, such as those identifying reserved accessible parking spaces and accessible restrooms (where not all restrooms are accessible), must display the international symbol of accessibility (ISA) (see ADA Standards figure 703.7.2.1). Signs indicating the presence of an assistive listening system must include the international symbol of access for hearing loss (see ADA Standards figure 703.7.2.4). Assistive listening systems must be present in assembly areas where audible communication is integral to the use of the space and audio amplification is provided. In courtrooms, assistive listening systems are required even if audio amplification is not provided.



Fig. 703.7.2.1 International Symbol of Accessibility



Fig. 703.7.2.4 International Symbol of Access for Hearing Loss

The City has conducted a detailed evaluation of its communications, information, and facility signage with regard to ADA Title II requirements. A summary of typical findings for signage is included in the Summary Report: Building and Park Facilities, Appendix B.

In recent years, the City has implemented accessibility improvements with regard to communications, information, and facility signage. Information about these improvements can be found in Appendix D.

3.0 Building Facilities and Park Facilities

The City's ADA consultant, MTC, conducted detailed accessibility evaluations of each of the City's building facilities, related parking lots/areas, and park facilities, including the Golden Cemetery and the Fossil Trace Golf Course. Findings of non-compliance are based on consistency with the criteria of the 2010 ADA Standards for Accessible Design. A summary of the findings from this evaluation is provided in Appendix B. The priority for removal of barriers to program accessibility has been estimated applying various factors, but primarily to reflect the degree of public presence and

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participation in city programs at each facility. The prioritization uses a utilitarian approach, emphasizing those locations where remedies can result in the greatest accessibility benefit to the largest number of people in the least amount of time. Practical factors, such as the availability of budgets, the lead time necessary to accomplish larger projects, the disruption of services resulting from alterations to existing facilities, and long-range facility planning were also considered when scheduling remedies needed to successfully implement the Transition Plan. Following the presentation of this draft Transition Plan to the public, public comments will be appended to the Transition Plan, and where relevant and feasible, the City may revise the Transition Plan priorities and schedule in response to those comments.

The City is responsible for the following 13 buildings:

- Building, Planning, and Public Works
- City Hall
- City Hall Annex
- City Shops
- Community Center
- Fire Department
- Fire Station #22
- Fire Station #23
- Fire Station #24
- Gateway Station
- Golden History Museum
- Police Department
- Water Treatment Administration Office

The City is responsible for the following parks and recreation facilities:

- Beverly Heights Park
- Clear Creek RV Park
- Clear Creek White Water Park
- Cressman Gulch Park
- Discovery Park
- Fossil Trace Golf Course
- Golden Cemetery
- Golden Heights Park
- Golden History Park
- Grampas Sports Complex
- Heritage Dells Park
- Hockey Stop Park
- Lions Park and Lions Park Restrooms
- New Loveland Mine Park
- Norman D. Memorial Park
- Parfet Park and Parfet Park Restrooms
- Rooney Road Sports Complex
- Southridge Park

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- The Splash at Fossil Trace (Water Park)
- Ulysses Sports Complex
- Vanover Park
- White Ash Mine Park
- Astor House Public Restrooms

In recent years, the City has implemented the accessibility improvements to its buildings and park facilities. Information about these improvements can be found in Appendix D.

3.1 Findings

The survey of accessibility conditions in city buildings and park facilities collected more than 6,000 lines of data. Findings document conditions or measurements (dimensions, slopes, number, etc.) of element attributes which are not consistent with the criteria in the ADA Standards. More than 2,300 attributes were identified as findings. However, not all findings are or might be barriers to program access. Such findings may need to be resolved in the future because of one of the following triggers:

- Need to remove a physical barrier as a Title I Reasonable Accommodation for an employee
- Location of a new or existing program to this room/space
- Renovation/alteration of the space
- Alteration of a primary function area, triggering path of travel barrier removal
- Noncompliant condition was designed/built by construction or alteration after January 26, 1992
- A specific complaint from the public

3.2 Barriers to Program Access

Findings that must be resolved through structural barrier removal to achieve program access are listed and scheduled in the Transition Plan. Of the 2,395 findings for conditions that do not conform to ADA Standards, only 1,936 currently are believed to present barriers to program access. The priority for removal of a given barrier is contingent on several factors. Perhaps the most important factor is the location of the barrier and the volume of public presence and activity at the location. Some public facilities, such as the Community Center, are more frequently accessed by the public than others. Site arrival points (i.e., accessible parking, public sidewalks, and nearby transit stops) and accessible routes connecting to accessible entrances have the highest priority at a facility. Areas where services are provided (such as a reception counter in a city building or a playground in a city park) have the next highest priority, followed by restrooms, and other spaces and elements.

3.3 Transition Plan Schedule

Moving forward, the City plans to implement improvements for the following items that have been identified as potential obstacles to program accessibility. The anticipated schedule is dependent on the availability of necessary resources and budgets. Many minor deficiencies may be resolved cost-effectively through normal maintenance activities. Due to cost and potential disruption of normal services at city facilities, some major projects may be delayed until necessary funding and alternative locations for services can be arranged. With respect to practical considerations, every effort will be

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made to first eliminate those conditions, the removal of which will provide the greatest benefit to the largest number of people.

3.3.1 ADA Barrier Removal – Budget Year 2023

3.3.1.1 Building, Planning, and Public Works [a priority 3 facility]

- Adjust opening forces (restroom doors)
- Install or correct tactile designation signs
- Lower sink in conference room
- Adjust grab bars
- Lower operable parts
- Provide minimum clear floor space at paper towel dispensers
- Provide tactile signs

3.3.1.2 City Hall [a priority 1 facility]

- Provide smooth surface 10 inches high on doors
- Install or correct tactile designation signs
- Install handrails both sides of ramp
- Lower operable parts
- Provide minimum knee clearance at courtroom table and lobby service counter
- Lower changing stations in restrooms

3.3.1.3 City Hall Annex [a priority 3 facility]

- Adjust hallway and men's restroom door opening forces and closing speeds

3.3.1.4 Clear Creek Water RV Park [a priority 1 facility]

- Raise vertical clearance above walkway
- Relocate toilet in women's bathhouse

3.3.1.5 Community Center [a priority 1 facility]

- Provide smooth surface 10 inches high on doors
- Adjust all door opening forces and closing speeds
- Provide clear spaces at exercise equipment
- Lower operable parts
- Lower changing stations in restrooms
- Lower seat in transfer shower (family)
- Remove obstacle to provide clear space at tactile designation sign

3.3.1.6 Fire Department No. 21 [a priority 2 facility]

- Adjust learning center and restroom doors opening forces and closing speeds

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3.3.1.7 Fossil Trace Golf Course [a priority 1 facility]

- Adjust door opening forces and closing speeds (restroom)
- Lower changing stations in restrooms
- Provide accessible signs at required height
- Provide accessible parking spaces with maximum 1:48 slopes, repair surfaces
- Provide cross slope 1:48 in walkway from accessible parking to entrance
- Lower dining surface of 5% of sitting or standing spaces at bar to 28-34 inches
- Provide minimum 27 inches of knee clearance (computer station and sink in lobby)

3.3.1.8 Golden History Center (Museum & Park) [a priority 1 facility]

- Adjust door opening force (vestibule-exterior)
- Lower coat hook and shelves
- Remodel men's restroom door to provide maneuvering clearance
- Provide (build) one compliant van accessible parking space
- Replace curb ramp
- Repair walking surfaces to provide accessible routes

3.3.1.9 Gramscas Sports Complex [a priority 1 facility]

- Adjust door opening forces and closing speeds (gymnasium, restrooms)
- Re-stripe lot, provide one compliant van accessible parking space

3.3.1.10 Splash Water Park [a priority 1 facility]

- Adjust door opening forces and closing speeds (all restrooms)
- Provide wheelchair spaces at picnic table
- Replace grab bars in transfer showers

3.3.1.11 Water Treatment Admin Offices (aka IT/Environmental) [a priority 3 facility]

- Provide smooth surface 10 inches high on doors (vestibule)

3.3.2 ADA Barrier Removal – Budget Year 2024

- Complete Self-Evaluation for DeLong Park and downtown Parking Garages owned by City.

3.3.2.1 Building, Planning, and Public Works [a priority 3 facility]

- Regrade surface to reduce slope inside the maneuvering clearance of the door (entrance)
- Reframe and install a door which provides the correct pull side clearance, or install a power-assisted door opener
- Provide knee and toe clearance at sink (conference room)
- Provide knee and toe clearance at service counter (lobby)
- Remove or mitigate protrusions (hallway and conference room)

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- Remove/relocate seat cover dispenser above grab bar
- Provide visible alarms (restrooms)

3.3.2.2 City Hall [a priority 1 facility]

- Provide handrails on both sides of ramp (courtroom)
- Provide 36-inch-wide walking surface between wall art and chairs (courtroom)
- Lower tactile designation signs
- Relocate tactile sign to latch side of door(s)
- Remove or mitigate protrusion (AED, lobby)
- Adjust flow height and provide 27 inches of knee clearance at drinking fountain
- Adjust door closing speed (men's restroom)
- Provide handles on both sides of toilet compartment doors
- Relocate grab bars
- Relocate TP dispensers (too close above grab bars/too close to toilet)
- Lower sinks (restrooms)
- Lower coat hooks (restrooms)
- Lower paper towel dispensers (restrooms)
- Lower mirror (women's restroom)

3.3.2.3 City Hall Annex [a priority 3 facility]

- Provide required maneuvering clearance at doors (conference rooms)
- Remove or mitigate protrusion (conference room B)
- Install self-closing hinges on toilet compartment doors
- Relocate rear grab bar (men's restroom)
- Lower paper towel dispensers (restrooms)

3.3.2.4 Clear Creek Water RV Park [a priority 1 facility]

- Lower door hardware (recycling)
- Relocate toilet in women's bathhouse
- Remove vertical discontinuities (steps) in walking surfaces within site
- Lower paper towel dispenser (laundry room)
- Lower brochure rack (front office)

3.3.2.5 Community Center [a priority 1 facility]

- Relocate toilets closer to near side wall
- Provide pull side maneuvering clearance at door (locker room)
- Provide accessible door hardware (play area)
- Move tactile signs on/to latch side of doors
- Lower (or provide full length) mirror (family locker room)
- Lower operable parts
- Lower coat hooks
- Move grab bars

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- Move TP dispensers
- Relocate seat in transfer showers
- Move shelf from maneuvering clearance at door
- Move table from maneuvering clearance at door
- Replace bench

3.3.2.6 Fire Department No. 21 [a priority 2 facility]

- Lower paper towel and soap dispensers
- Provide tactile character in elevator
- Remove or mitigate protrusion (phone)
- Lower tactile designation signs
- Install tactile sign (unisex restroom)

3.3.2.7 Fire Department No. 24 [a priority 1 facility]

- Remove vertical discontinuities from ramp surface
- Provide handrails on both sides of ramp

3.3.2.8 Fossil Trace Golf Course [a priority 1 facility]

- Lower changing tables
- Lower paper towel dispensers (restrooms)
- Move TP dispensers
- Remove door stops and other obstructions in bottom 10 inches of door surfaces
- Move grab bars
- Provide required maneuvering clearance on push side of door (restaurant)
- Lower mirror (men's restroom)
- Lower operable parts, etc. (ball washers, maps and pencils, fire alarm)
- Remove or mitigate protrusion (lobby, drinking fountain)
- Install/lower/move designated tactile signage
- Remove steps or provide alternate accessible route (path to portable toilet on 11)

3.3.2.9 Gateway Station [a priority 2 facility]

- Correct elevator control panel
- Reduce gap at elevator door
- Provide braille instructions on fare machine (garage)
- Provide volume control on fare machine (garage)

3.3.2.10 Golden Heights Park [a priority 1 facility]

- Restripe parking spaces/access aisle for a minimum of three accessible spaces, one of which must be van accessible

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3.3.2.11 Golden History Center (Museum & Park) [a priority 1 facility]

- Increase clearance between doors in series (vestibule)
- Remove door stops and other obstructions in bottom 10 inches of door surfaces (back door and men's restroom)
- Provide alternate formats, assistive listening system (ALS), and ALS sign (audio component exhibit)
- Provide operable hardware (Make A Sound, in lobby)
- Lower operable parts
- Provide captions on TV touch screen control
- Remove or mitigate protrusions (fire extinguisher in hall and shelf in The Salon)
- Provide signs to redirect to accessible restrooms
- Provide international symbol of accessibility (ISA) on signs for accessible restrooms
- Provide braille below raised characters on tactile signs
- Install self-closing hinges on toilet compartment door (men's restroom)
- Remove vertical discontinuities (steps) in walking surfaces (park interior trail)

3.3.2.12 Grampas Sports Complex [a priority 1 facility]

- Replace benches (restrooms)
- Move and lower paper towel dispenser so clear floor space is outside door swing (women's restroom)
- Move and lower TP dispenser (men's restroom)
- Raise TP dispenser (12 inches minimum) above grab bar (women's restroom)
- Lower grab bars (men's and women's restrooms)
- Remove door stops and other obstructions in bottom 10 inches of door surfaces (gymnasium and restrooms)
- Fix control force on drinking fountain
- Lower AED cabinet (so operable part is within reach range)
- Install room tactile identification signage on the latch side of the door (gymnasium)
- Relocate toilet closer to near side wall (women's restroom)

3.3.2.13 Hockey Stop Park [a priority 3 facility]

- Provide a marked access aisle adjacent to the designated accessible parking space

3.3.2.14 Splash Water Park [a priority 1 facility]

- Lower coat hook (women's locker room)
- Move grab bars
- Provide required maneuvering clearance on pull side of doors (locker rooms)
- Provide wheelchair space at picnic table
- Move/replace seat in transfer shower compartment (women's locker room)
- Remove vertical discontinuities (steps) and gaps in walking surfaces (at sand pit, route to public sidewalk)
- Lower toilet seat (men's locker room)

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- Relocate toilet closer to near side wall (locker rooms, unisex restrooms)

3.3.2.15 Water Treatment Admin Offices (aka IT/Environmental) [a priority 3 facility]

- Install room tactile identification signage on the latch side of the door (conference room)
- Lower operable parts (thermostat, phone, fire alarm control panel)

3.3.3 ADA Barrier Removal – Budget Year 2025

3.3.3.1 Building, Planning, and Public Works [a priority 3 facility]

- Provide knee and toe clearance at sink (men's restroom)
- Provide required maneuvering clearance on pull side of door (women's restroom)

3.3.3.2 City Hall [a priority 1 facility]

- Replace curb ramp
- Provide signs to redirect to accessible route to entrance
- Provide knee and toe clearance at sink (conference room)
- Lower door thresholds (restrooms)
- Remove or mitigate protrusions (hand dryer, paper towel dispenser in restrooms)
- Insulate or otherwise configure drain and supply pipes to prevent contact with sharp or abrasive surfaces under sink (women's restroom)

3.3.3.3 City Hall Annex [a priority 3 facility]

- Remove or mitigate protrusions (paper towel dispenser in restrooms)
- Install room identification signage with raised letters and Braille on the latch side of the door (vestibule, break room)
- Lower operable part (alarm system)

3.3.3.4 Clear Creek Water RV Park [a priority 1 facility]

- Provide a firm, stable, and slip-resistant surface (tent platform)
- Rebuild the walking surface with compliant running and cross slopes, or install handrails, edge protection, and landings required for ramps (routes to front office)
- Provide an accessible route with a firm and stable surface (routes to front office)
- Provide minimum required clearance at landings (routes to front office)
- Locate operable part within reach range (water at dump station)

3.3.3.5 Community Center [a priority 1 facility]

- Adjust or modify the distance between side wall and the centerline of the toilet (Children's Yellow Room)
- Install side and rear wall grab bars (Children's Yellow Room)

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- Provide required maneuvering clearance at pull-side of doors or install power-assisted doors (men's restroom first floor by daycare, women's first floor by locker)
- Move exercise equipment to provide minimum width of accessible routes, adjacent clear floor spaces, and clear floor space at bench
- Lower (outer) handrail on pool ramp
- Install self-closing hinges on toilet compartment doors (first floor/locker rooms)
- Lower hand-held spray unit (family shower first floor locker room)
- Move or replace seat (family shower first floor locker room)
- Lower sinks (various locations)
- Lower service counter (kitchen)
- Lower tactile signs (various locations)
- Lower/move obstruction to operable part (lobby)
- Lower vision/side lights at doors (various – note: safe harbor if pre 3/15/2012)
- Mitigate/remove protrusion (first floor women's restroom)
- Lower thresholds at doors (terrace)
- Lower section of dining surface (lobby)
- Provide play tables knee clearance for children (multiple locations, 24" minimum)
- Remodel to provide accessible transfer or roll-in showers (first floor locker rooms)
- Provide smooth surface 10 inches high on doors
- Provide turning space (sauna)
- Reframe/install door with minimum clear opening (sauna)
- Reframe and install doors which provide the correct pull/push side clearance, or install power-assisted door openers (various)
- Move table to provide 18"x18" clear space at tactile sign (Yellow Room)
- Remove partition to provide minimum width at urinal
- Replace grab bar (too short) (family/first floor locker room)
- Replace hoistway sign ("star") (1st floor)
- Replace benches (locker rooms and sauna)
- Replace vending machines with machines that have operable parts within reach ranges
- Reverse door swing to provide clearance (toilet compartments)

3.3.3.6 Fire Department [a priority 2 facility]

- Provide required maneuvering clearance at pull-side of doors or install power-assisted door (unisex restroom)
- Lower sink (unisex restroom)
- Insulate or otherwise configure drain and supply pipes to prevent contact with sharp or abrasive surfaces under sink (unisex restroom)
- Relocate changing table to provide minimum clearance (women's restroom)
- Install self-closing hinges (toilet compartment, women's restroom)
- Install a door-pull on both sides of the door (toilet compartment, men's restroom)
- Install tactile room identification sign (conference room)
- Remove or mitigate protrusions in circulation paths

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3.3.3.7 Fire Station #24 [a priority 1 facility]

- Remove and replace side flare with 10% slope maximum or install protected, returned curb.

3.3.3.8 Fossil Trace Golf Course [a priority 1 facility]

- Relocate toilet closer to near side wall (unisex restrooms)
- Provide required maneuvering clearance at pull-side of doors or install power-assisted door (restrooms)
- Lower sink (lobby)
- Install a door pull on both sides of the door(s) (toilet compartments)
- Insulate or otherwise configure drain and supply pipes to prevent contact with sharp or abrasive surfaces under sink (restrooms)
- Remove or mitigate protrusions in circulation paths (women's restroom, air freshener)
- Lower coat hook(s) (restrooms)
- Lower service counter (Pro Shop)
- Lower thresholds at doors (Restaurant, Mesa, Fireside)
- Lower work surface (lobby, computer station)
- Rebuild the walking surface with compliant running and cross slopes, or install handrails, edge protection, and landings required for ramps (chipping green, ball dispenser)
- Remodel restroom to provide sufficient space in the accessible toilet compartment (unisex restroom)

3.3.3.9 Gateway Station [a priority 2 facility]

- Install Braille and tactile characters to identify control buttons (elevator)
- Provide a number 5 key that is tactilely distinct from the other keys, pictograms with contrasting colors, enable speech (parking "far machine")

3.3.3.10 Golden History Center (Museum & Park) [a priority 1 facility]

- Provide smooth surface 10 inches high on door(s) (back door)
- Remove or mitigate protrusions in circulation paths (donkeys)
- Install high-low drinking fountain
- Provide required maneuvering clearance at pull-side of door(s) or install power-assisted door (men's restroom)
- Provide accessible toilet compartment (men's restroom)
- Install grab bars (men's restroom)
- Reposition grab bar (unisex restroom)
- Lower coat hook (unisex restroom)
- Rebuild walkways to provide accessible routes with firm, stable, slip-resistant surfaces and accessible slopes (throughout park)

3.3.3.11 Gramscas Sports Complex [a priority 1 facility]

- Install high-low drinking fountain

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- Provide required maneuvering clearance at pull-side and push-side of doors, or install power-assisted door (restrooms)
- Lower coat hook (women's restroom)
- Provide flush control on open side of toilet (women's restroom)
- Install handles on both sides of compartment door (restrooms)
- Install self-closing hinges on compartment door (women's restroom)
- Install accessible hardware at sink /dispenser(s) (women's restroom)
- Install sign to redirect to accessible restroom (men's)
- Lower vision/side lights at doors (gymnasium – note: safe harbor if pre 3/15/2012)
- Provide storage elements in accessible lockers (40" – 48" high, women's restroom)

3.3.3.12 Police Department [a priority 2 facility]

- Install tactile/braille signs in correct locations (holding cells)
- Provide accessible transfer benches (holding cells)
- Lower vision/side lights at doors (Interview room A – note: safe harbor if pre 3/15/2012)
- Provide turning space (Interview Room A)

3.3.3.13 Splash Water Park [a priority 1 facility]

- Provide required maneuvering clearance at pull-side of doors or install power-assisted doors (locker rooms, unisex restrooms)
- Lower service counters (concessions, information, front desk)
- Provide clear floor space at end of benches (dressing rooms)
- Rebuild walkways to provide accessible routes firm, stable, slip-resistant surfaces and accessible slopes or ramps (throughout site)
- Replace seat in transfer shower compartment
- Remove or mitigate protrusions in circulation paths (unisex restrooms, pump house)
- Provide five types of accessible ground-level play components
- Provide turning space (men's dressing room)
- Rebuild restrooms to provide ambulatory toilet compartments
- Rebuild transfer shower compartments
- Lower at least one urinal (men's locker room)

3.3.3.14 Water Treatment Admin Offices (aka IT/Environmental) [a priority 3 facility]

- Remove or mitigate protrusions in circulation paths (mirror, paper towel dispenser, women's restroom)
- Regrade surface to reduce slope in maneuvering clearance of the door (vestibule)

4.0 CITY RIGHTS-OF-WAY

The City performed an assessment of all sidewalks and trails in city Rights-of-Way (ROW). The focus of the assessment was cross slope, width and running slope of each trail or sidewalk segment. The City's sidewalks and trails are divided into segments, typically one city block in length. Each segment

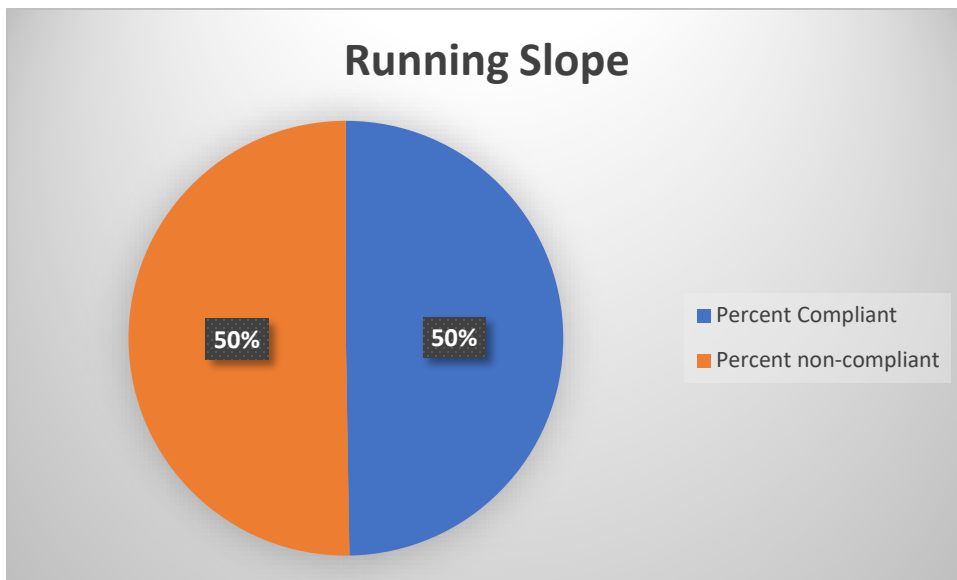
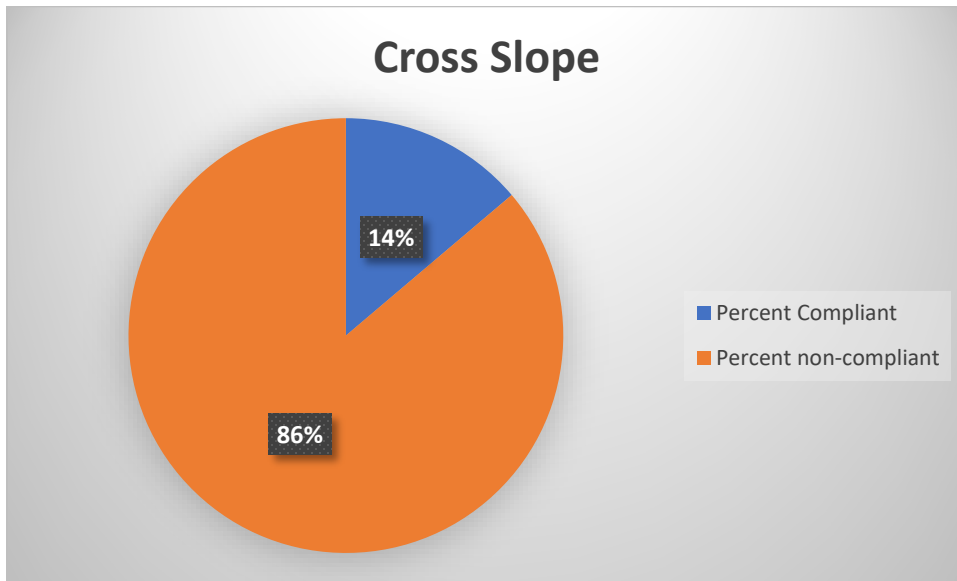
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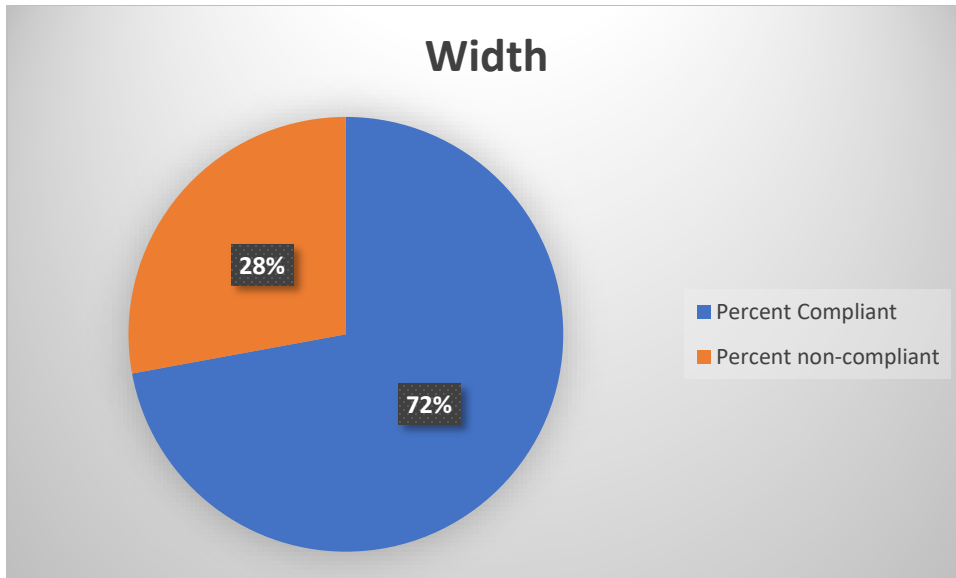
was evaluated against the Public Rights-Of-Way (PROW) criteria for cross slope, width, and running slope. Measurements were taken at several locations in each segment and a segment was failed if the criteria were not met at all locations measured. Because of this methodology, the result of this assessment is worst case and imprecise. Access ramps were not part of the assessment.

The City anticipates a period of decades to complete implementation of the Transition Plan for sidewalks and trails, and a cost of more than \$50 million.

4.1 Findings

The assessment evaluated 1,940 total segments. The findings below are percentages of segments, not a percentage of total linear feet of sidewalk or trail. Maps of ROW compliance with cross slope and width are included in Appendix C.





4.2 Transition Plan

Moving forward, the City plans to address data shortcomings so that an actionable plan to improve facilities in the ROW can be developed. The City plans to do the following:

- Continue evaluation of sidewalks and trails in the ROW to improve information about locations where facilities do not meet ADA criteria. Locations where running slope is not met will include an analysis of the adjacent terrain. Curb ramps, both location and compliance, will be included in ongoing evaluation.
- On-street parking in commercial areas, where paid parking exists, will be audited for ADA compliance.
- The results of the current Bike Pedestrian Master Plan update will be used to identify high priority areas in the ROW that need improvements.
- Engineering will develop priority criteria for future investment.
- Ongoing replacement will include appropriate corrections wherever practical.

5.0 WEBSITE AND DIGITAL COMMUNICATIONS

The City's ADA consultant, MTC, conducted detailed accessibility evaluations of the City's main website and the Fossil Trace Golf Course website in 2019. Findings of non-compliance were based on consistency with the criteria of the Web Content Accessibility Guidelines (WCAG) 2.0. A summary of the findings from this evaluation is provided in Appendix A4.

In 2021, Colorado HB21-1110 was passed to establish statewide accessibility standards that all local, regional, and state government agencies must meet by July 1, 2024. Agencies, and the vendor partners they use to provide services, are required to provide a platform that is compliant with the most recently published W3C WCAG. (Note: At the time of this report, the standard of compliance

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is version 2.1, conformance level AA.)

This means the City is responsible for WCAG compliance in the creation and publishing of any online content and materials, including (but not limited to) text, links, images, forms, PDFs, documents, and embedded third-party applications.


In addition to the main city website and the Fossil Trace Golf Club website, the City of Golden owns/maintains several other websites that must also achieve WCAG compliance. These include the following websites:

- www.visitgolden.com
- www.goldencemetery.com
- www.goldenhistory.org
- www.guidinggolden.com
- www.gco.tv
- www.splashinggolden.com
- www.volunteergoldenco.org

The City is also responsible for digital content maintained on social media and vendor platforms used on the City's behalf.

The priority for removal of barriers to program accessibility has been developed applying various factors but primarily to reflect the degree of public utilization of digital platforms as well as regulatory compliance. The prioritization uses a utilitarian approach, emphasizing remedies that result in the greatest accessibility benefit to the largest number of people in the least amount of time, but which will ultimately bring the City into full WCAG compliance by July 1, 2024. Practical factors, such as the availability of budgets, the lead time necessary to accomplish larger projects, and the disruption of services, were also considered when scheduling remedies needed to successfully implement the Transition Plan. Following the presentation of this draft Transition Plan to the public, public comments will be appended to the Transition Plan, and where relevant and feasible, the City may revise the Transition Plan priorities and schedule in response to those comments.

Accessibility of city-owned and/or maintained digital content must address four general areas of accessibility:

- 1) Technical compliance with WCAG for all city websites that meets current guidelines under the four principles of "perceivable, operable, understandable, and robust". This may include code remediation, as well as some content and navigation changes.
- 2) Remediation of existing content and digital assets such as images without alternative text, video recordings without captions, untagged PDF files, and improperly anchored links. This includes both website content and social media content.
- 3) Training city staff who create content to build documents and provide website and digital content that is accessible moving forward.
- 4) Checking for WCAG compliance for  applications that run on city-maintained websites but are sourced by third-party vendors.

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Much of the first area of accessibility can be accomplished globally across each city-owned website via remediating cascading style sheets, although some intention must be given to user interface aspects such as navigation and readability.

Most of the second area of accessibility will require extensive manual efforts to remediate existing website and social media content. All photos and images used on any digital platform must be checked and alt text added if it's missing. All existing PDFs must also be checked and individually optimized for accessibility. Remediation must initially be prioritized based on the frequency and volume of traffic to the content.

The third area of accessibility will require a plan for training staff content creators both initially, and on an ongoing basis as requirements and technology change, and for onboarding new employees.

The fourth area will require official confirmation of the vendor of WCAG compliance. If confirmation is unavailable, negotiation to achieve compliance may be necessary. If negotiation is unsuccessful, it may be necessary to find a new service vendor.

The City anticipates complete implementation of the Transition Plan by July 1, 2024, in alignment with the requirements of CO HB21-1110.

5.1 Findings

The survey of accessibility conditions in the city's website and digital communications found accessibility barriers including the lack of alternative text, lack of captioning for video content, and non-accessible documents, particularly pdfs.

The City seeks to make the content of all city-owned websites and digital properties available to all users; disability and/or the use of assistive technologies should not be a barrier to city services, information, or public engagement. Further, the City desires to improve opportunities for online programs and services that may be difficult to access in person. The City seeks to train staff in best practices for making accessible website content, PDFs, and other documents posted online, and to make all current and future digital content, including social media, accessible with the use of alternative text, video captions, appropriate color contrast, and other success criteria provided by WCAG.

5.2 Transition Plan Schedule

The City must reach full WCAG compliance by July 1, 2024. Moving forward, the City plans to implement improvements for the following items that have been identified as potential obstacles to accessibility. The anticipated schedule is dependent on the availability of necessary resources and budgets. Many minor deficiencies may be resolved cost-effectively through normal maintenance activities. Due to cost and potential disruption of normal city services, some major projects may be delayed until necessary funding and alternatives for services can be arranged. Every effort will be made, with respect to practical considerations to eliminate first, those conditions the removal of which will provide the greatest benefit to the largest number of people.

- Adopt a Web Accessibility Policy

- Move as many PDF forms as possible to AccessGov by the end of 2023.
- Issue RFP for www.cityogolden.net redesign in first half of 2023 with stipulation website must be certified WCAG compliant. Complete redesign by the end of the year.
- Utilizing surveys and/or other research methods, identify online services currently lacking that would benefit disabled populations in Golden, and include in redesign.
- Optimize all PDFs for accessibility with priority on high-use PDFs.
- Train employees who create content and documents for a city-owned website or digital property on how to create accessible documents and website content by end of 2023.
- Improve social media accessibility through training, and publishing rules and SOPs by end of 2023.
- Identify accessibility issues on additional city website properties and vendor websites and create remediation strategies for each by end of 2023.

6.0 Public Outreach Test websites using outside resources such as consultants, focus groups, interested citizens, or similar alternatives.

The City recognizes that public participation is an important component in the development of its Transition Plan. Input from the community has been gathered and used to help define priority areas for improvements within the jurisdiction of the City.

This document has been made available for public comment. Appendix H will provide a summary of comments received and detailed information regarding the public outreach activities.

7.0 Progress Monitoring and Transition Plan Management

This Transition Plan is a living document that will continue to be updated as conditions within the City evolve. The initial schedule is to formally review the complete document (main body and appendices) at least once per year to identify any need for updates. Updates to the appendices or attachments may be made more frequently as needed. Any substantive updates to the main body of this document will include a public comment period to continue the City's public outreach efforts.

The City recognizes that ADA compliance is an ongoing responsibility that will require monitoring to identify future accessibility issues. For example, facilities that currently meet ADA requirements could fall out of compliance in the future due to factors such as damage, disrepair, or alterations/renovations/additions to existing buildings or parks that could create new accessibility obstacles. The creation of new programs or the relocation of current programs will require evaluation of any existing or potential barriers to program accessibility prior to determining the site or location of such programs. Therefore, the ADA Title II Coordinator and Transition Plan Implementation Coordinator will establish an on-going monitoring/inspection program/process to ensure that facilities continue to comply with ADA requirements. City employees will also be

encouraged to report any accessibility concerns or deficiencies that are identified.

8.0 Formal Adoption of ADA Transition Plan

This ADA Transition Plan is hereby adopted by the City of Golden, effective [month] of [year].

Signed:

ADA Title II Coordinator

Date

ADA Transition Plan Implementation Coord.

Date

Authorizing Official

Date

9.0 Appendices

- A. Self-evaluation Processes
 - 1. Summary Report: ADA Policy Review
 - 2. Summary Report: Management Participation
 - 3. Summary Report: ADA Knowledge Survey
 - 4. Summary Report: Digital Accessibility/Website Assessment
- B. Summary Report: Buildings and Park Facilities
- C. PROW Compliance Maps by Ward
- D. Barriers Resolved Prior to Transition Plan Development
- E. Public Notice of ADA Requirements and Grievance Procedure
- F. Contact Information
- G. Glossary of Terms
- H. Summary of Public Comments [in final adopted draft of plan]

Appendix A – Self-evaluation Processes

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A1. Summary Report: ADA Policy Review

A2. Summary Report: Management Participation

A3. Summary Report: ADA Knowledge Survey

A4. Summary Report: Digital Accessibility/Website Assessment

Appendix B – Summary Report: Buildings and Park Facilities

Appendix C – PROW Compliance Maps by Ward

Appendix D – Barriers Resolved Prior to Transition Plan Development

Appendix E – Public Notice of ADA Requirements and Grievance Procedure

Appendix F – Contact Information

Appendix G – Glossary of Terms

Appendix H – Summary of Public Comments