



Introduction

Lots of directives, letters, and books on accessibility have been written. A new batch appears every time guidelines or policies change.

This guidebook is intended to help designers and recreation professionals apply the Forest Service Outdoor Recreation Accessibility Guidelines (FSORAG) and Forest Service Trail Accessibility Guidelines (FSTAG). These guidelines only apply on National Forest System lands. While they are official policy only for the U.S. Department of Agriculture (USDA) Forest Service, they contain useful concepts to help other agencies and organizations develop accessible outdoor recreation and accessible trails.

Once managers and designers understand what is needed, accessibility becomes integrated into the thinking, planning, designing, construction, and maintenance of every project, rather than being an afterthought. That's the way we need to do business, and that's why this guidebook was written.

Coordination among Forest Service employees and with volunteer partners will be essential to successfully imple-

menting the FSORAG and FSTAG. The Forest Service is committed to helping ensure that the FSORAG and FSTAG are implemented.

Both the FSORAG and the FSTAG are based on the draft accessibility guidelines for outdoor developed areas created by the Architectural and Transportation Barriers Compliance Board (Access Board). The Forest Service and other Federal agencies will work with the Access Board as it develops final accessibility guidelines for outdoor developed areas. When the Access Board finalizes its accessibility guidelines for outdoor developed areas, the Forest Service will revise the Forest Service Outdoor Recreation Accessibility Guidelines and the Forest Service Trail Accessibility Guidelines to incorporate the Access Board's standards, where those provisions are a higher standard, as supplemented by the Forest Service. The supplementation will ensure the agency's application of equivalent or higher guidelines and universal design, as well as consistent use of agency terminology and processes. Once the guidelines are final, any changes that are needed will be made to this guidebook and it will be reissued.

The Outdoors Are for Everyone—Fundamentals of Outdoor Recreation and Trails Accessibility

It's all about people having the opportunity to enjoy the outdoors. Public lands offer a wide range of recreation settings and opportunities from highly developed campgrounds to untouched wilderness areas.

when the decision is made to construct or alter a building, trail, or other facility, we must ask, "Will a person with a disability have an equal opportunity to use this facility?" The key is to ask this question before the facility has been designed and built. Then we can provide facilities for use by all people, including people with disabilities.

Why Accessibility Is Important

The Forest Service is committed to integrating accessibility into the complete range of recreation opportunities while protecting natural resources and settings so that all people, including people who have disabilities, have the opportunity to enjoy the great outdoors. This commitment is established in Forest Service policy. Visitors have the right to choose both the type of recreation they want to pursue and the setting in which to pursue it. Of course, recreationists must always check to make sure that what they want to do is allowed.

How many people benefit from accessible facilities? At the time of the 2000 census, 54 million people, or one in every five people in the United States, had a disability that significantly limited one or more major life activities such as walking, seeing, hearing, breathing, thinking, and so forth. Of that number, 4 percent used wheelchairs and 7.4 percent used crutches, canes, walkers, or other assistive devices.

How does accessibility fit into this range of opportunities? We certainly don't want to pave the wilderness. However,

Additionally, the population of the United States is aging. By the year 2030, 110 million people will be older than 55. As people age, impairments are more likely to hinder activities. There's a lot of truth to the saying that if you live long enough, you are sure to join the ranks of people with disabilities.

Recreation Opportunities on National Forests and Grasslands

- National forests and grasslands are in all but six of the United States and in Puerto Rico and the Virgin Islands.
 - 175 national forests and grasslands
 - 192 million acres (77.7 million hectares) to enjoy
- 406 congressionally designated wilderness areas
 - 35.2 million acres (14.2 million hectares) in which to experience solitude and a pristine environment
- 95 wild and scenic rivers
 - 4,418 miles (7,110 kilometers) of beautiful water to float or fish
- 133,000 miles (214,000 kilometers) of trails to hike
- 23,000 recreation sites
 - 4,300 campgrounds in which to pitch a tent or set up a trailer or recreational vehicle
- Thousands of miles (or kilometers) of scenic byways to drive
- 205 million visits each year

For more information on Forest Service recreation opportunities, visit <http://www.fs.fed.us/recreation/>.

If anyone in a group has a disability, accessibility is an issue for the whole group, as shown in figure 1. It influences where the group can go and what they can do. Ski areas learned many years ago that each skier who has a disability is usually accompanied by three or four additional skiers who don't have disabilities. They all want to buy lift tickets, rent gear, eat lunch, and ski together. Accessibility is good customer service and good for business.



Figure 1—Although the Blackberry Crossing Campground in the White Mountain National Forest is not highly developed, it's a great place for this group of friends to enjoy camping together.

Just as recreational preferences vary among the general population, people with disabilities enjoy different types of outdoor recreation. We must make sure that facilities allow all visitors, including people with disabilities, to choose their own recreational activities.

What Terms Should Be Used?

Although people who have disabilities refer to themselves in many different ways, as an agency we must ensure that the terminology we use complies with legal direction and is considered acceptable by the majority of people. Numerous “buzz words” have been used to describe

people with disabilities over the years. The good news is that the terminology question was settled in the early 1990s. The 1990 Americans with Disabilities Act (ADA) uses the terms *persons with disabilities* and *accessible*. In 1992, when Section 504 of the Rehabilitation Act was renewed and amended, its terminology was corrected to include just the terms *accessible* and *persons with disabilities*. Also in 1992, Federal agencies were directed to correct terminology in their regulations, policies, and other documents to match the Rehabilitation Act and ADA terminology.

A disability is a medically definable condition that causes a limitation in one or more of a person's major life activities such as walking, seeing, hearing, speaking, breathing, thinking, and so forth. Person-first terminology is used because the person is more important than his or her disability. Examples of person-first terminology include:

- *A person who is blind—**not** a blind person*
- *A person who uses a wheelchair—**not** a wheelchair-bound person or a wheelchair person*

A handicap is a barrier or circumstance that makes progress or success difficult, such as a flight of stairs that may be impassable for a person using a wheelchair or a negative attitude toward a person who has a disability. The term *handicapped* has negative connotations. The word has been around for centuries, but wasn't used to refer to people with disabilities until the late 1800s. Many people believe that the term “handicapped” was first used in relation to persons with disabilities when Civil War veterans whose injuries prevented them from working were begging on the streets with “cap in hand.” Standard references do not support this story. But because the story has become legend and begging for a living is degrading, describing people with disabilities as *handicapped* is offensive to most people with disabilities. It may be useful to think of *handicapped* as the *H* word and eliminate it from your vocabulary, publications, and other materials.

Disability Etiquette

- Use common sense and extend common courtesy to everyone.
- Don't patronize anyone; treat adults like adults.
- Be patient. Some people need more time to express themselves or move about.
- Relax and be yourself. It's okay to use common phrases such as "See you later" when talking with a person who is blind or has limited vision.
- Speak directly to the person and maintain eye contact, don't speak through a companion or interpreter.
- Use person-first language. Don't use words like handicapped, victim, or afflicted to describe a person who has a disability.
- Offer assistance to persons with disabilities and follow their specific directions.
- Do not pet, feed, or distract service animals without first asking permission—they are working animals, not pets.



Figure 2—Two friends enjoy an accessible trail that allows them to hike through the rain forest.

Accessible facilities comply with the accessibility guidelines and standards. A site, facility, or program is either accessible or it is not accessible. The only way to evaluate accessibility is to evaluate the facility's compliance with the guidelines in effect at the time it was designed, constructed, or altered. There are no shades of accessibility. For instance, a parking space either complies with the standards and is accessible, or it doesn't comply with the standards and is not accessible. The specific technical provisions of the standards for surfacing, slope, and the size of the parking space and walkway connection must be met, regardless of the conditions around the parking space. *Almost* doesn't count. For instance, figure 2 illustrates one type of trail that complies with accessibility guidelines.

Other terms concerning accessibility that are incorrect include *partially accessible*, *accessible with assistance*, *barrier free*, *ADA accessible*, and *handicapped accessible*. The first two terms are incorrect because a facility is either accessible or it is not accessible. If the facility is not accessible, the visitor or employee needs to know

which specific areas are not accessible. *Partially accessible* and *accessible with assistance* imply some accessibility problems, but don't provide enough information to be helpful. *Barrier free* isn't legally defined or commonly understood. *ADA accessible* confuses laws with accessibility standards. Although *handicapped accessible* is a common phrase, it includes the *H* word that many people with disabilities find offensive. *Handicapped accessible* also is a contradiction in terms because a handicap is a barrier and the term *accessible* means there aren't any barriers. The best terms are simply *accessible* and *not accessible*.

The Law Requires Accessibility

The **Architectural Barriers Act** (ABA) (<http://www.access-board.gov/about/laws/ABA.htm>) became law in 1968. The act mandates that all facilities built, purchased, rented, altered, or leased by, for, or on behalf of a Federal agency must be accessible.

In 1973, the **Rehabilitation Act** became law. Section 504 (<http://www.access-board.gov/enforcement/Rehab-Act-text/title5.htm>) of the act applies to programs and activities that are conducted by Federal agencies and by entities that receive funding from, or operate under a permit from, Federal agencies. Section 504 requires that these programs and activities provide an equal opportunity for individuals with disabilities to participate in an integrated setting, as independently as possible. The only exception to the requirement is when the program would be fundamentally altered if changes were made solely for the purpose of accessibility. An example of a fundamental alteration to a program would be allowing use of a motor vehicle in an area not designated for motor-vehicle use.

The USDA implementation guideline for Section 504 is **7 CFR 15**, which was finalized in 1994. Part 15e (http://www.access.gpo.gov/nara/cfr/waisidx_03/7cfr15e_03.html) applies to programs conducted by the Forest Service. Subpart 15b (http://www.access.gpo.gov/nara/cfr/waisidx_03/7cfr15b_03.html) applies to programs operating with Federal agency funding, under special use permits, or under other agreements with the agency. If a building or structure must be entered for someone to participate in the activity at the site, the building must be accessible.

The **Americans with Disabilities Act (ADA)** (<http://www.access-board.gov/about/laws/ADA.htm>) became law in 1990. Except for Title V Section 507c, the ADA doesn't apply to Federal agencies' facilities and programs. They were already required to be accessible under the ABA and Section 504 of the Rehabilitation Act. The ADA applies to State and local government services and to public accommodations, such as motels and hotels, and organizations that are open to the public.

Title V Section 507c of the ADA applies to congressionally designated wilderness. It reaffirms the 1964 Wilderness Act and clarifies that agencies aren't required to change the character of wilderness areas to provide accessibility. Section 507c also defines a wheelchair and states that

wheelchairs meeting that definition can be used in congressionally designated wilderness.

Universal Design

The best way to integrate accessibility is to use the principles of universal design. Universal design is simply designing programs and facilities to be usable by all people, to the greatest extent possible, without separate or segregated access for people with disabilities (figure 3). Using universal design principles is Forest Service policy, as stated in the Forest Service Manual, Section 2333.33 (http://www.fs.fed.us/im/directives/fsm/2300/id_2330-2005-2.doc).



Figure 3—A group of friends enjoy a break during a stroll on a boardwalk through a wet area. The accessible trail makes it possible for the whole group to enjoy the same experience.

Since the early 1990s, the Forest Service has followed the universal design policy that all new and reconstructed facilities, programs, and associated elements are to be accessible to the greatest extent possible. This commitment often exceeds the minimum requirements of the

Federal accessibility guidelines. The result of universal design is independence, integration, and dignity for everyone.

More information on accessibility guidelines is provided in the next chapter.

Program Accessibility

For the purposes of evaluating accessibility, a *program* is an activity in which people may participate. Basically, the program is the reason a person visits an area and may include opportunities such as:

- Camping in a campground
- Viewing the scenery at an overlook (figure 4)
- Swimming at a beach
- Enjoying solitude in the wilderness
- Gathering information at a visitor center
- Learning about an area on an interpretive trail

The 1994 USDA regulations—7 CFR 15e (http://www.access.gpo.gov/nara/cfr/waisidx_03/7cfr15e_03.html) and 15b (http://www.access.gpo.gov/nara/cfr/waisidx_03/7cfr15b_03.html) govern the USDA implementation of Section 504 of the Rehabilitation Act. They prescribe the requirements for ensuring access to programs.

If a program is provided inside a building or structure, everyone, including people with disabilities, must be able to enter the facility to participate in the program. Unfortunately, some older structures are not yet accessible, and a few cannot be made accessible because doing so would destroy their historic integrity. If a facility is not accessible, the program must be provided in another manner, called an alternative program. All alternative programs must allow everyone to participate together. Separate, segregated programs just for people with disabilities aren't permitted. For example, if an evening program at a campground previously has been held in an amphitheater that isn't accessible, the program must be moved to an accessible location until the amphitheater is accessible.



Figure 4—Interpretation is for everyone. Signs must be placed so that everyone can see and understand them.

Under Section 504 of the Rehabilitation Act and 7 CFR 15, access to programs that don't depend on constructed facilities also are required to provide "equal opportunity" to all. That means that a person with a disability cannot be denied the opportunity to participate in a program that is open to everyone. To participate, any person, with or without a disability, must meet the criteria for the program and abide by any restrictions, including those of the Forest Land Management Plan, for that program in that area. While people with and without disabilities are to have an equal opportunity to participate in programs and to strive to gain the same benefits offered by those programs, no guarantee of success is required.

The laws require equal opportunity; they don't require exceptional opportunity. For example, roads, trails, or other areas on national forests and grasslands that are not designated for motor-vehicle use under a forest travel management plan are closed to all motor vehicles, including those used by people with disabilities.

Access to programs must be viewed through the lens of the entire program, not through the eyes of an individual. Access to the program is to be provided so long as doing so doesn't "fundamentally alter" the program. That is, providing access doesn't change the primary functions of the program. Allowing motorized vehicles in a non-motorized area would be a fundamental alteration of the recreational program for that area.

People ask, "What about reasonable accommodation?" The laws are clear. Reasonable accommodation, which means doing whatever each individual needs to be able to fulfill the functions of a job, despite any disability, only applies in employment. It does not apply to recreation facilities and trails. The laws also are clear that when it comes to program access, the overall program is the focus. Criteria to participate in that program must be the same for all participants.

Questions often arise concerning the use of wheelchairs in areas that restrict or prohibit mechanical devices or

motorized use. As clarified in Title V Section 507, the *Federal Wilderness Areas* section of the Americans with Disabilities Act, the legal definition of a wheelchair is:

A device designed solely for use by a mobility-impaired person for locomotion, that is suitable for use in an indoor pedestrian area.

"Designed solely for use by a mobility-impaired person for locomotion," means that the wheelchair was originally designed and manufactured solely for use for mobility by a person with a disability. This term doesn't include the aftermarket retrofit of a motorized unit to make it usable by a person with a disability. "Suitable for use in an indoor pedestrian area" means usable inside a home, mall, courthouse, or other indoor pedestrian area. Figures 5 through 9 show some examples of devices that are wheelchairs and one that is not.



Figure 5.



Figure 6.



Figure 7.

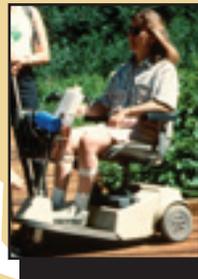


Figure 8.

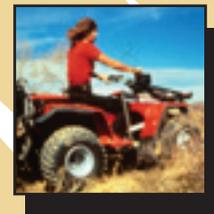


Figure 9.

Figures 5 to 9—Although figures 5 to 8 show wheelchairs, figure 9 shows a device that is not a wheelchair. Many wheelchairs look different from those shown. The only sure way to determine if a device is a wheelchair is to answer the two key questions described in the text.

To determine whether a device meets the definition of a wheelchair, evaluate it against the two sections of the definition. Ask yourself the following questions:

1—Was the device designed solely for mobility by a person with a disability?

If **no**, the device doesn't meet the definition and doesn't qualify for use as a wheelchair.

If **yes**, ask the second question:

2—Is it suitable for use in an indoor pedestrian area?

Consider whether it could be used in a mall, courthouse, or similar area without the security personnel directing the user to leave.

If **no**, the device doesn't meet the definition and doesn't qualify for use as a wheelchair.

If the answer to both questions is **yes**, the device meets the definition of a wheelchair and can be used wherever foot travel is permitted.

A person whose disability requires use of a wheelchair or assistive device may use a wheelchair that meets the definition above anywhere foot travel is permitted, in accordance with Title V, Section 507c, of the ADA (36 CFR 212.1) and the Forest Service Manual 2353.05. Wheelchairs or assistive devices, including battery-powered wheelchairs, aren't categorized as motorized vehicles or mechanical devices.

Transition Plans

Since the 1968 passage of the ABA, facilities designed, built, bought, rented, altered, or leased by, for, or on behalf of a Federal agency are required to be accessible. Unfortunately, some Federal facilities are not yet accessible.

To correct this problem, in the early 1990s the Forest Service called for all units to complete transition plans identifying the changes needed to make each facility accessible and the timeline for completing the changes. Funding to complete the transition plans was provided to the regions in 1991, 1992, and 1993.

The accessibility regulation for the programs of all USDA agencies, 7 CFR 15e, was finalized in December 1994. This regulation required transition plans to be completed by December 31, 1997. 7 CFR 15e Section 150 (d) (http://www.access.gpo.gov/nara/cfr/waisidx_03/7cfr15e_03.html) details the specific requirements for transition plans and their contents.

In 1998, under Public Law 105-359, Congress mandated an evaluation of accessibility to outdoor recreation on federally managed lands for both the United States Department of Agriculture and Department of the Interior agencies. The results of the independent study that

TERMINOLOGY TIP—

Wheelchairs are not motor vehicles.

36 CFR 212.1 defines a motor vehicle as any vehicle that is self-propelled, other than:

- A vehicle operated on rails.
- Any wheelchair or mobility device, including one that is battery powered, that is designed solely for

use by a mobility-impaired person for locomotion, and that is suitable for use in an indoor pedestrian area.

Wheelchairs that meet this legal definition may be used anywhere foot travel is allowed.

was published in June 2000 highlighted to Congress that many Forest Service and other Federal agency units still had not completed their transition plans. The attention resulting from the report increased the pressure on Federal agencies to get the plans completed. To keep units focused on completing this work, the Forest Service national budget direction each year since 2001 has included direction to the field to complete the transition plans.

Program Accessibility: Existing Facilities (7 CFR 15e Section 150) allows a program to be “viewed in its entirety” when accessibility is evaluated. However, a transition plan must be developed and implemented for any program that is not accessible because the facility housing the program is not accessible.

No standardized format has been provided for transition plans. Each region and some national forests developed their own transition plan format. Check with your agency’s accessibility coordinator, your regional recreation accessibility coordinator (RRAC) (<http://fsweb.mtdc.wo.fs.fed.us/toolbox/acc/documents/coord.htm>) or your region/station facilities program leader (http://fsweb.wo.fs.fed.us/eng/documents/fac_leaders.htm) to find out whether your local unit has developed a format. If not, request a sample of the formats used by other units. At a minimum, the transition plan must include:

- A list of obstacles to accessing the facility and program as identified in the accessibility evaluation survey
- A detailed description of the methods that will be used to provide accessibility
- The schedule for implementing the plan, including the actions that will be taken each year if the work takes more than a year

- The signature of the official responsible for implementation of the transition plan

Transition plans must be available to the public.

Accessibility Evaluation Surveys

An accessibility evaluation survey is the first step in developing a transition plan. During the survey, each portion of a structure is compared to the accessibility standards, and compliance and deficiencies are recorded.

For example, doorways must be checked to see whether they have at least 32 inches (815 millimeters) of clear width. Measure clearance when a swinging door is open 90 degrees and when the door is fully opened for other types of doors. Stretch the measuring tape from the face of the open door to the nearest portion of the doorframe or latch mechanism on the latch side (figure 10).

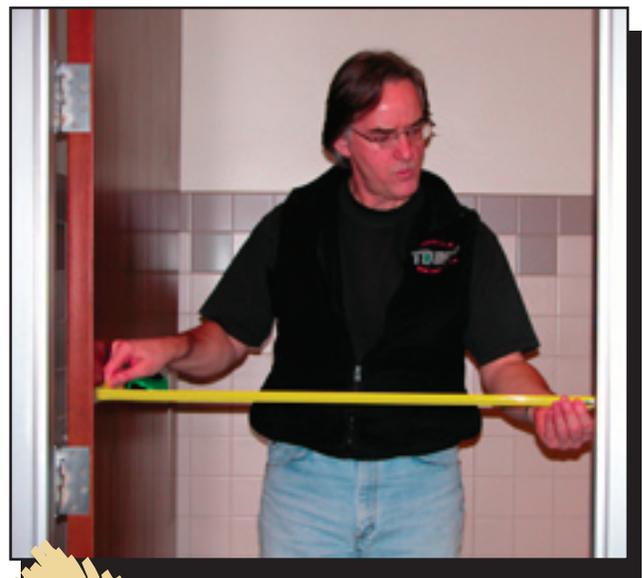


Figure 10—All doorways must have a minimum of 32 inches (813 millimeters) clear width.

Two checklists on the Internet can be used as accessibility evaluation guides for facilities: the *Uniform Federal Accessibility Standards Checklist* (<http://www.access-board.gov/ufas/UFASchecklist.txt>) and the *ADA Accessibility Guidelines Checklist for Buildings and Facilities* (<http://www.access-board.gov/adaag/checklist/a16.html>). However, your local unit may have developed

checklists that will better match your facilities. Check with your agency's accessibility coordinator, your regional recreation accessibility coordinator (<http://fsweb.mtdc.wo.fs.fed.us/toolbox/acc/documents/coord.htm>), or your region/station facilities program leader (http://fsweb.wo.fs.fed.us/eng/documents/fac_leaders.htm) for more information.

