

Guidelines

for

Other Power Driven Mobility Devices



Executive Summary

Erie MetroParks is committed to enabling the use and enjoyment of the Park District's recreational assets owned or managed by Erie MetroParks. The changes to Americans with Disabilities Act (ADA) law offer those who require mobility devices greater access to Park District recreation facilities, amenities and trails. The Park District has completed an initial assessment of the trails and other assets of Erie MetroParks and has determined which Other Power Driven Mobility Devices (OPDMD's) are authorized for use in specific recreation areas. Information provided herein will describe which OPDMD's can be used within Erie MetroParks' managed areas and facilities.

Overview

Erie MetroParks is committed to enabling the use and enjoyment of the park district's recreational assets owned or managed by Erie MetroParks. The changes to American with Disabilities Act (ADA) law offer those who require mobility devices greater access to park district recreation facilities, amenities, and trails. We have completed an assessment of the trails and other assets of Erie MetroParks and have determined which Other Power Driven Mobility Devices (OPDMD's) are authorized for use in specific recreation areas. Information provided herein will describe which OPDMD's can be used within Erie MetroParks.

Definitions

Other Power Driven Mobility Devices (OPDMD's)

The following are guidelines for the use of Other Power Driven Mobility Devices (OPDMD's) by individuals with mobility disabilities in Erie MetroParks managed properties. The guidelines are in compliance with the Revised Final Title II Regulation of the Americans with Disabilities Act of 1990 (42 U.S. C. 1213):

A. Wheelchairs – a manually-operated or power-driven device designed primarily for use by an individual with a mobility disability for the main purpose of indoor, or of both indoor and outdoor locomotion.

1. Wheelchairs and manually-powered mobility aids used by individuals with mobility disabilities shall be permitted in any areas open to pedestrian use.

B. Other Power Driven Mobility Devices (OPDMD's) – An OPDMD is defined in **28 CFR Part 35** Regulation §35.104 as “any mobility device powered by batteries, fuel, or other engines- whether or not designed primarily for use by individuals with mobility disabilities- that is used by individuals with mobility disabilities for the purpose of locomotion, including golf carts/cars, electronic personal assistance mobility devices (EPAMDs), such as the Segway PT, or any mobility device designed to operate in areas without defined pedestrian routes, but that is not a wheelchair within the meaning of this section.”

1. Electric-powered mobility devices include:

any mobility device powered by batteries, including multiple passenger carts (three or four wheels), electronic personal assistance mobility devices (EPAMDs – such as the Segway PT), battery-powered bikes (two or more wheels) and single passenger scooters (three or more wheels).

2. Gas-powered mobility devices include:

any mobility device powered by a gas-fueled engine using natural gas, gasoline, diesel, synthetic or bio fuel or combination thereof, including all-terrain vehicles, carts (three or more wheels), off-road bikes (two or more wheels), motor scooters (two or more wheels), motor cycles (two or more wheels), tractors and vehicles (four or more wheels).

3. Tandem wheel device: A two, three or more-wheeled mobility device where the wheel alignment is parallel along one or more axels.

4. Inline wheel device: A two-wheeled mobility device where the wheel direction of travel are aligned in the same plane.

Impacts Analysis

Erie MetroParks staff performed a review of the possible recreational, safety, and ecological impacts associated with OPDMD's on a variety of park trails. Ecological concerns include the increased noise pollution associated with gas-powered vehicles and off-trail trampling, especially in situations where a device needs a large area to turn. Other ecological concerns include the presence of wetlands, seasonally wet trails, obstructions, and steep slopes. Safety concerns include the ability to safely negotiate trail turns, grades and physical obstructions including bridges, steps, boardwalks, etc.

Steep grade was a key consideration in the evaluation process. Several trails were eliminated from consideration of OPDMD use when they crossed grades of 12% or more and were composed of a natural trail surface. Several steep slopes are prone to erosion and environmental degradation.¹

Trails were evaluated by park staff walking each trail to determine the suitability of areas for OPDMD's. Appendix A includes a spreadsheet of park trails and a summary of OPDMD suitability analysis. Appendix B includes contour maps of each park.

Although numerous factors were considered in the environmental analysis, four key features emerged as the primary focus for determining suitability as described below:

1. Trail Width – Trails less than 7 feet in width were determined unsuitable for use by OPDMD's (generally defined as having a structure width of no more than 36 inches) as these trails would not allow for two-way OPDMD traffic and/or simultaneous use by pedestrians.

¹ Furnace Run Watershed Plan 2011. Unpublished report of the Furnace Run Balanced Growth Initiative.

2. Trail Slope – Trails that maintain a natural surface that cross a slope that is equal to or exceeds 12% grade were deemed unsuitable for OPDMD's. Several steep slopes in the parks are prone to erosion and environmental degradation.²
3. Trail Surface – Trail surface was a key consideration as paved and otherwise improved surfaces (gravel, crushed limestone, etc.) can negate some of the environmental concerns associated with steep slopes.
4. Special Use Trails – This type of trail is designated for single use. The nature of this use precludes other combined uses. At the present time, the only single use trails within the MetroParks is a pedestrian only perimeter path. The use of OPDMD's on the pedestrian only perimeter path is prohibited.

Trail Ratings Analysis for OPDMD Access

In addition to analyzing trails for OPDMD's, Erie MetroParks categorized all trails by difficulty levels. Level 1, fully accessible, stationary or move at own pace. Level 2, mostly flat, may include unpaved or uneven terrain, slow pace. Level 3, some hills or uneven terrain, moderate pace. Level 4, hill or uneven terrain, strenuous pace. The analysis considered the physical strenuousness of each trail as well as the surface type and width.

Results and Recommendations

Based on the methodology described above, several parks were excluded from OPDMD use based on park staff walking each trail measuring slope, cross slope, width and determining suitability. These areas included places where the grade was 12% or more and were made of a natural trail surface.

Based on these methods, the following trails were determined unsuitable for OPDMD use.

Pelton Park pelton park trail, The Coupling MetroPark buckeye trail, Osborn MetroPark southwoods trail, perimeter path, DuPont Marsh State Nature Preserve loop trail, maple trail, Edison Woods MetroPark ghost railroad, upland oak, thornapple, east oak hickory, cranberry creek, smokey woods trail, north creek trail, west oak hickory Castalia Quarry MetroPark quarry rim, dolomite, fossil, levee loop, fringed gentian, old crusher millhouse, winding wood extension trail, winding woods Barnes Extension wetland loop trail, Hoffman Forest MetroPark paw paw trail, woodland trail.

² Furnace Run Watershed Plan 2011. Unpublished report of the Furnace Run Balanced Growth Initiative.

Based on these methods, the following trails were determined suitable for OPDMD use. Use of these trails by OPDMD devices must follow general restrictions described below.

Huron River Path MetroPark huron river path, Milan Towpath MetroPark trail, The Coupling MetroPark service road, bluebell trail, sycamore trail, Osborn MetroPark meadow trail, dildine trail, meadow trail cutoff, farm lane connector, prison farm trail, sorthwoods trail CFP at Eagle Point meadow loop trail, eagle point trail, gateway trail, service road Edison Woods MetroPark dogwood loop, adventure walkway, south ridge trail, north ridge trail, big meadow trail, deehr road trail Wyandot Wetland Meadows Preserve small loop trail, middle trail, cross trail, inner loop trail, perimeter loop trail Barnes Extension Sandusky bay trail, east loop trail, meadow loop trail Joseph Steinen Wildlife Area Galloway pond loop trail, perimeter loop trail, middle lane trail

- A. General Restrictions – Individuals with mobility disabilities may use OPDMD’s on approved Erie MetroParks properties subject to the following requirements:
- a. There shall be no recreational operation of snowmobiles, dune buggies, motorcycles, all-terrain vehicles or other motorized recreational vehicles at Edison Woods MetroPark.³
 - b. An OPDMD is defined as an electric-powered device, with a width no great than 36 inches, designed to transport a single individual with a disability as a substitute for walking used by a person with a mobility disability.
 - c. An OPDMD must remain on trails and may not cause unnecessary damage to the trail surface.
 - d. An OPDMD must be operated at a safe speed (5 mph or less).
 - e. Most natural surface trails are sensitive to local weather patterns. Severe or prolonged periods of rain may soften soils and create conditions where OPDMD use would increase erosion or rutting of trails. Erie MetroParks operations and Ranger staff may be required to make seasonal use restrictions based on weather and trail conditions.
 - f. Battery powered devices must be safely maintained and protected from leakage.
 - g. Specific trail features such as boardwalks or bridges may be posted against OPDMD use based upon their design or capacity.
 - h. An OPDMD must have the capacity to safely negotiate trail features and obstructions such as steps and boardwalks and must do so entirely within the trail boundaries.

³ Declaration of Use Restrictions for Edison Woods MetroPark, March 28th 2011.

- i. Gas-powered mobility devices are not permitted on the trails or open spaces of Erie MetroParks.
- j. The exclusion of gas-powered mobility devices, as compared to electric-powered mobility devices, is due to the engine noise of gas powered vehicles that produce a significant zone of disturbance to the activities of native wildlife and negatively impact the visitor experience (Reijnen et al., 1997, Havlic, 2002). In addition, gas-powered mobility devices create a risk of serious harm to the immediate environment from the danger created by the heat of the gas-fired engine and from leaking oil and chemicals (Havlic, 2002). Noise does not preclude recreation activities but does diminish the enjoyment of the overall experience. Furthermore, the noise from gas-powered mobility devices poses a health risk to adjacent recreationalists when it exceeds 70dB. The World Health Organization has set 70dB as a maximum safe noise level in the work place. Most gas-powered vehicles, such as ATV's and gas-driven motor bikes, exceed this noise level. Some studies have documented damage to wildlife at noise levels of 20dB (Ryals, et. al., 1999).

B. Inquiry into Disability:

Erie MetroParks employees or volunteers inquiring as to a mobility disability or use of an OPDMD on Erie MetroParks properties shall comply with the following:

Erie MetroParks employee or volunteer shall not ask a person using an OPDMD questions about the nature and extent of the person's disability.

Erie MetroParks employee or volunteer may ask a person using an OPDMD to provide a credible assurance that the OPDMD is required because of the person's disability. Erie MetroParks employee or volunteer shall accept the presentation of a valid, State-issued, disability parking placard or card, or other State-issued proof of disability as a credible assurance that the use of OPDMD is for the person's mobility disability. In lieu of a valid, State-issued disability parking placard or card, or State-issued proof of disability, Erie MetroParks employee or volunteer shall accept as credible assurance a verbal representation, not contradicted by observable fact, that the OPDMD is being used for a mobility disability. A "valid" disability placard or card is one that is presented by the person to whom it was issued and is otherwise in compliance with the State of issuance's requirements for disability placard or cards.

Appendix A

(Spreadsheet of park trails and a summary of OPDMD suitability analysis)

Appendix B

(Contour maps of each park)

Appendix C

(Trail maps for each park)