

Town of Millbury Accessibility Plan

▣ ***Self-evaluation*** ▣ ***Transition Plan*** ▣ ***Policies and Procedures*** ▣



November 2006

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I. INTRODUCTION

Background

The Millbury Accessibility Plan is a planning document intended to comply with state and federal accessibility regulations. One goal of the plan is to provide an evaluation of the town's operations to determine whether or not they are on the whole accessible to people with disabilities. A second goal is to identify physical barriers to public buildings, sites and services owned or operated by the town. The plan will identify recommendations on making programs or services accessible and will provide general estimates of cost for the removal of architectural barriers. Sample policies and procedures as required under the Americans with Disabilities Act (ADA) are also provided.

Through the completion of the Millbury Accessibility Plan, the town will be in compliance with certain provisions of the Americans with Disabilities Act and will give people with disabilities an equal opportunity to participate in the mainstream of public life offered to all citizens. In addition, through the completion of this plan, the town will be eligible to apply for state and federal funding to eliminate identified barriers.

Definition of Commonly Used Terms

Disability - a physical or mental impairment that substantially limits a major life activity, such as walking, seeing, hearing, learning, breathing, caring for oneself, or working. Individuals who have successfully completed or are currently enrolled in a drug or alcohol rehabilitation program are also considered to be disabled. The ADA protects three classes of people with disabilities:

- those who have a disability, and
- those who have a record of having a disability, and
- those who are regarded as having a disability, whether or not they actually have one,

Qualified Individual with a Disability - an employee or job applicant who meets legitimate skill, experience, education, or other requirements of an employment position that he or she holds or seeks. The person must also be able to perform the "essential" (as opposed to marginal or incidental) functions of the position either with or without reasonable accommodation. Job requirements that screen out or tend to screen out people with disabilities are legitimate only if they are job-related and consistent with business necessity.

Reasonable Accommodation - any change or adjustment to a job or work environment that permits a qualified applicant or employee with a disability to participate in the job application process, to perform the essential functions of a job, or to enjoy benefits and privileges of employment equal to those enjoyed by employees without disabilities. For example, reasonable accommodations may include: acquiring or modifying equipment or devices, job restructuring, modifying work hours, making the workplace structurally accessible to disabled individuals, reassigning an employee with a disability to an equivalent position as soon as one becomes vacant, providing qualified readers for the blind or interpreters for the deaf, and/or appropriately adjusting or modifying examinations, training materials, or policies.

Readily Achievable - the removal of physical barriers which are easily accomplishable without much difficulty or expense. The "readily achievable" requirement is based on the size and resources available. For example, a larger business with more resources are expected to take a more active role in removing barriers than smaller businesses. The ADA also recognizes that economic conditions vary. When a business has resources to remove barriers, it is expected to do so; but when profits are down, barrier removal may be reduced or delayed. Barrier removal is an ongoing obligation, thus physical barriers must be removed as resources become available in the future.

Undue Hardship - an action or accommodation which requires significant difficulty or expense for an entity. Criteria for making such a determination include the nature and cost of the accommodation, the financial resources of the employer, or the impact of such accommodations on the financial resources of the employer.

Public Participation

This plan was formally initiated on December 14, 2005 and completed in November 2006. During this short period of time, a number of activities, meetings, and actions occurred to insure full and meaningful participation of the general public. A survey form was sent to all town departments, boards, and commissions to evaluate those services and programs being offered as well as operating procedures and policies. Individual meetings were held with various department heads and officials and properties open to the public or offering direct services to the public as described in this plan were visited and assessed. Regular communication was conducted with the Commission on Disabilities and Town Manager through working meetings and regular e-mail correspondence. Numerous public meetings were held on the plan with the Commission on Disabilities during the duration of the project. A public presentation of the Millbury Accessibility Plan was made in November 2006 as part of the Board of Selectmen's regularly scheduled meeting.

Organization

This plan consists of seven sections and an Executive Summary. Section I provides an overview of the document and its primary goals and objectives. Section II is an overview of the various state and federal accessibility laws and regulations. Section III contains a self-evaluation of programs and services offered by the town. Section IV consists of a transition plan including an inventory of town-owned property and general estimates of cost for barriers removal and accessibility compliance. Section V contains an overview of Millbury's public housing and compliance with accessibility requirements. Section VI identifies a number of policies and procedures to be adopted by the town in compliance with the ADA. Section VII includes a summary of recommendations identified in the plan. Supplemental information is provided as Appendices.

II. PRIMARY ACCESSIBILITY REGULATIONS

Federal Regulations

Architectural Barriers Act (ABA) - 1968

The Architectural Barriers Act requires access to facilities designed, built or altered with Federal funds or leased by Federal agencies. The law covers a wide range of facilities, including post offices, social security offices, prisons, and national parks. It also applies to non-government facilities that have received Federal funding, such as certain schools, public housing, and mass transit systems. Passed in 1968, the ABA is the first measure by Congress to ensure access to the built environment. Facilities that predate the law generally are not covered, but alterations or leases undertaken after the law took effect can trigger coverage. Building construction changes made under this law, must meet the Uniform Federal Accessibility Standards (UFAS). Special provisions are included in the UFAS for historic buildings that would be threatened or destroyed by meeting full accessibility requirements

Rehabilitation Act - 1973

The Rehabilitation Act requires recipients of federal financial assistance to make their programs and activities accessible to everyone. Recipients are allowed to make their properties accessible by altering buildings, by moving programs and activities to accessible spaces, or by making other accommodations. It also protects the rights of Federal employees with disabilities. The law also requires electronic and information technology procured by Federal agencies to be accessible according to certain established standards.

Voting Accessibility for the Elderly and Handicapped Act - 1984

The Voting Accessibility for the Elderly and Handicapped Act of 1984 generally requires polling places across the United States to be physically accessible to people with disabilities for federal elections. Where no accessible location is available to serve as a polling place, a political subdivision must provide an alternate means of casting a ballot on the day of the election. This law also requires states to make registration and voting aids available for disabled and elderly voters, including information by telecommunications devices for the deaf (TDDs), which are also known as teletypewriters (TTYs).

Air Carrier Access Act - 1986

The Air Carrier Access Act of 1986 prohibits discriminatory treatment of people with disabilities in air travel. The law applies to both domestic and foreign air centers. Regulations issued by the Department of Transportation under this Act cover a range of issues, including boarding assistance and access features in newly built aircraft.

Fair Housing Act - 1988

The Fair Housing Act, as amended in 1988, prohibits discrimination in housing on the basis of disability, as well as race, color, gender, and religion. It covers housing in the public and private sectors and bans discrimination in any aspect of selling or renting housing. Under the law, new multifamily housing must be able to be adapted for accessibility according to established guidelines. The law also requires reasonable exceptions to housing policies and operations so that people with disabilities are afforded equal housing opportunities.

Americans with Disabilities Act (ADA) - 1990

On July 26, 1990 President George H. Bush signed the Americans with Disabilities Act, a federal civil rights law that prohibits the exclusion of people with disabilities from the right of equal

opportunity. Much of the ADA legislation was built upon legislation that had already been in place for a number of years. This included portions of the Rehabilitation Act of 1973 which regulates employment practices in the federal government and by federal contractors, establishes architectural and transportation accessibility standards and guarantees equal access to entities that receive federal funds.

The ADA is a civil rights law. Under the ADA, civil rights are guaranteed to individuals who experience discrimination because they; 1) have a physical or mental impairment that substantially limits a major life activity, 2) have a record of such an impairment, and 3) are regarded as having such an impairment. Interpretation of the law and its enforcement was intended to be carried out on a case by case basis through the nation's legal system. Specific complaints of individuals may be filed with a number of different federal agencies including the Equal Employment Opportunity Commission (Title I), the United States Department of Justice (Titles II and III), the United States Department of Transportation (Titles II and III), and the Federal Communications Commission (Title IV).

The ADA is divided into five titles or sections. These are:

- Title I: Employment
- Title II: State and Local Government and Public Transportation
- Title III: Public Accommodations and Services Operated by Private Entities
- Title IV: Telecommunications
- Title V: Miscellaneous Provisions

The Town of Millbury is bound specifically by Titles I and II.

There is a basic process for complying with the Americans with Disabilities Act:

- Learning about the requirements of the ADA and how it applies to a facility or program;
- Conducting a survey to identify barriers;
- Establishing a list of potential modifications for barrier removal, including changes to policies, facilities and cost estimates;
- Removing existing barriers.

The ADA prohibits discrimination on the basis of disability in all services, programs, and activities provided by small local governments (i.e. towns). Thus, people with disabilities must have an equal opportunity to participate in and benefit from a town's services, programs and activities. To accomplish this, the ADA sets requirements for town facilities, new construction and alterations, communication with the public and policies and procedures governing town programs, services, and activities.

All towns must perform a self-evaluation of its policies, practices, programs, procedures, services, etc. (including communication) to determine compliance under the ADA. Towns must make reasonable modifications to these policies, programs, services, etc. to avoid discrimination against individuals with disabilities unless such modification would result in a fundamental alteration in the nature of that program or service.

Although the ADA only requires local governments with 50 or more employees to take additional, specific measures, it is strongly encouraged that even smaller towns with less than 50 employees follow the same process to insure overall compliance with the ADA. These additional measures include 1) the designation of an individual to coordinate ADA compliance, 2) the development of a transition plan, and 3) the development of an ADA grievance procedure.

Title I

Equal Employment Opportunity

The ADA guarantees equal employment opportunities to people with disabilities who are qualified for a job. The ADA specifically prohibits discrimination in all activities relating to employment. This includes hiring, termination, compensation, recruitment, tenure, job training, advancement and promotion, layoff, fringe benefits, and any other employment-related benefits or activities. Employers, including municipal governments, should carefully review their employment policies and procedures to eliminate discriminatory practices. In many cases, discrimination is unintentional, due to a lack of knowledge and awareness of the employer. The ADA covers all aspects of "employment" including the application and interview process, hiring, promotion, termination, compensation and benefits, and training.

Reasonable Accommodations

Qualified applicants for employment are entitled to "reasonable accommodation" during the hiring process and as part of his/her employment. The term reasonable accommodation can mean many different things depending on the circumstance and what is "reasonable" under that circumstance. It may mean modifying an existing facility so that a person with a disability can perform his/her job (i.e. replace a door handle with a lever, lower a counter top, etc.), changing the way things are customarily done (office policy, work hours, etc.) or restructuring a job. It is the responsibility of the employer to provide a reasonable accommodation unless it would impose an "undue hardship" on the employer or detract from the essential functions of a position. Once the proposed accommodation becomes too difficult or expensive, it can be deemed as no longer reasonable and therefore, not required. *Caution:* What is unreasonable for an employer of six, may be deemed reasonable for an employer of twenty-five. Refer to Appendix A: Accommodations Decisions Chart for assistance in determining whether an accommodation is required.

Title II

Program Accessibility

The ADA guarantees people with disabilities equal opportunity to participate in all programs, services, and activities of state and local government. Accessibility standards must be followed for new construction as well as accommodations. These standards are based on the ADA Accessibility Guidelines (ADAAG) as developed by the U.S. Access Board provide guidance to the ADA Standards for Accessible Design as enforced by the U.S. Department of Justice (DOJ), U.S. Department of Transportation (DOT), and the federal courts and apply nationwide. The ADAAG derives in part from earlier standards developed under the UFAS. Once the guidelines are adopted as part of the ADA Standards they become an integral part of the ADA. Currently the ADAAG of 7/1/94 are in effect. Guidelines covering courthouses, prisons, and other government facilities (1998); children's environments (1998); play areas (2000); and recreation facilities (2002) have since been developed by the U.S. Access Board. The DOJ has yet to adopt these as part of the ADA Standards. Although these guidelines are not enforceable standards for compliance, they should be seriously considered in all new construction and renovation projects.

The ADAAG involves a distinction between public or common use area and employee work areas. Public/common use areas must be fully accessible. Employee work areas may be addressed through Title I and "reasonable accommodations" made when the need arises. A higher level of expectation is anticipated for governmental entities than that of the private sector. Regardless of receipt of federal aid, all local governments and their boards, departments, commissions and districts are subject to the provisions of the ADA. Access to services is a critical aspect and basic premise of the ADA. Governmental sponsored programs, services and activities must be available to all, regardless of disability. If structural changes to buildings are required, a transition plan is also usually required. New construction and/or additions to local governmental buildings must be fully compliant and accessible to those with disabilities. Alterations to space used by the public as well as employee work areas must also be ADA compliant unless it is "technically infeasible" to do so (i.e. involves structural, physical, or site constraints). If technically infeasible, the alteration must comply "to the maximum extent feasible". Existing buildings require that the services or programs offered in that facility are readily accessible.

When programs, services, or activities are located in facilities that existed prior to January 26, 1992, the effective date of Title II of the ADA, towns must make sure that they are also available to persons with disabilities. If however, it requires that these programs, services, or activities are substantially altered to provide access or results in undue financial or administrative burden, then reasonable alternatives or accommodations may be allowed. When a service, program, or activity is located in a building that is not accessible, Title II of the ADA allows a "small" local government to achieve program accessibility in several ways. This can include:

- relocating the program, service, or activity to an accessible facility; or
- providing the program, service, or activity in another manner that meets ADA requirements; or
- undertaking modifications to the building or facility itself to provide accessibility.

Thus, to achieve program accessibility, a small town need not make every existing facility accessible. It can relocate some programs to accessible facilities and modify other facilities, avoiding expensive physical modifications of all town facilities.

Effective Communication

Local governments must ensure effective communication with individuals with disabilities. Where necessary to ensure that communications with individuals with hearing, vision, or speech impairments are as effective as communications with others, municipal governments must provide appropriate auxiliary aids.

The type of auxiliary aid or service necessary to ensure effective communication will vary according to the type of communication involved and the needs of the individual. "Auxiliary aids" include such services or devices as sign language interpreters, assistive listening headsets, television captioning and decoders, telecommunications devices for deaf persons (TDD's), videotext displays, readers, taped texts, Brailled materials, computer disks, audio recordings, and large print materials. In addition, telephone emergency services, including 911 services, must provide direct access to individuals with speech or hearing impairments.

Municipal governments are not required to provide auxiliary aids or take any actions that would result in a fundamental alteration in the nature of a service, program, or activity or that will result in undue financial and administrative burdens. However, alternative auxiliary aids that do not result in a fundamental alteration or undue burden must be provided. For example, it is not necessary to provide sign language interpreters for all interactions with persons who are deaf or hard of hearing. Daily interaction may suffice through written notes or similar exchanges. However, public meetings, interrogations by local police officers, or similar technical interactions will most likely require interpreters or assistive listening systems. It is required that alternative auxiliary aids be available that do not result in financial or administrative burdens yet meet the needs of the disabled individual.

Title III

Title III of the Americans with Disabilities Act requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. It is intended that all individuals have the opportunity to benefit from businesses and services of a place of public accommodation. The regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable. Public accommodations that must meet the barrier removal requirement include a broad range of establishments (both for- and non-profit) such as inns, hotels, motels, restaurants, bars, theaters, concert halls, stadiums, museums, auditoriums, retail stores, grocery stores, bakeries, laundromats, banks, barber and beauty shops, gas stations, professional offices, medical offices, private schools, health spas, bowling alleys and other places that serve the public. Private entities that own, lease, lease out, or operate places of public accommodation in existing buildings are responsible for complying with the barrier removal requirement. Private clubs and religious organizations, including places of worship, are exempt from the ADA public accommodation requirements.

Title IV

Title IV requires common carriers engaged in interstate communications by wire or radio to provide telecommunications relay services for both hearing- and speech-impaired individuals. Regulations developed to implement this provision require that these services operate 24 hours a day. It is the intention to give those persons with hearing and speech impairments the opportunity to communicate with any other individual. This is to be achieved in a manner such that the users are not pay greater rates than those for equivalent services used by persons without hearing or speech impairments. In addition, any televised public service announcements provided or funded in whole or in part by any federal agency or instrument of the federal government must include closed captioning of the verbal content of such announcement.

Title V

Title V consists of various miscellaneous provisions of the ADA including a requirement for the development of technical assistance manuals by the appropriate regulatory federal agency, a report on the ADA and wilderness areas, a description of the responsibility of the United States Congress, religious organizations, and enforcement and dispute resolution.

Telecommunications Act - 1996

The Telecommunications Act of 1996 requires telecommunications products and services to be accessible according to guidelines developed by the Access Board. It covers a broad range of

products, including telephones, cellular phones, pagers, and fax machines. The Federal Communications Commission (FCC) enforces requirements of the law.

Help America Vote Act – 2002

Each polling place must have at least one accessible voting machine by January 1, 2006 under the Help Vote America Act. The act (Public Law 107-252), which was signed by President Bush on October 29, 2002 also requires each piece of voting equipment bought with federal money on or after January 1, 2007 to be accessible.

State Regulations

521 Code of Massachusetts Regulations: Architectural Access Board

Section 521 of the Code of Massachusetts Regulations, "521 CMR: Architectural Access Board" is a specialized section of the State Building Code which provides the actual construction standards and specifications which must be adhered to for work performed on "public" buildings (see definition of public building in 521 CMR) in the Commonwealth of Massachusetts. These buildings are also governed by the Federal ADA Accessibility Guidelines (ADAAG) and or the Uniform Federal Accessibility Standards (UFAS). If there are conflicting requirements, the higher or stricter standard typically governs. For the most part, 521 CMR contains the higher standard, but there are some exceptions. The purpose of 521 CMR is to make public buildings and facilities accessible to, functional for, and safe for use by persons with disabilities. It is the intent of 521 CMR to provide persons with disabilities full, free and safe use of all buildings and facilities so that all such persons may have the educational, living and recreational opportunities necessary to be as self-sufficient as possible and to assume full responsibilities as citizens.

The Massachusetts Architectural Access Board (MAAB) is a regulatory agency whose mandate, as established under M.G.L. c.22 S13A, is to develop and enforce regulations pertaining to public access. The MAAB also decides on variance requests, issues advisory opinions, and makes decisions on complaints. Local building inspectors are responsible for enforcement of the provisions of 521 CMR.

Jurisdiction of 521 CMR

All additions to, reconstruction, remodeling, and alterations or repairs of existing public buildings, which require a building permit or which are so defined by a state or local inspector, shall be governed by those applicable sections of 521 CMR.

If the work being performed amounts to less than 30% of the full and fair cash value of the building and

- a) the work costs less than \$100,000, then only the work being performed is required to comply with 521 CMR; or
- b) the work costs \$100,000 or more, then the work being performed is required to comply and an accessible entrance, toilet, telephone and drinking fountain (if toilets, telephones and drinking fountains are provided) are also required.

If the work performed amounts to 30% or more of the full and fair cash value of the building, the entire building is required to comply with 521 CMR. Where the cost of constructing an addition to a building amounts to 30% or more of the full and fair cash value of the existing building, both the addition and the existing building must be fully accessible.

An historic building or facility that is listed or is eligible for listing in the National or State Register of Historic Places or is designated as historic under appropriate state or local bylaws may be granted a variance by the MAAB to allow alternate accessibility.

The MAAB Regulations also address various circumstances involving change in use, work performed over a period of time, multiple uses of one building, outdoor facilities, temporary structures, security structures and non-occupiable spaces. For more information on these areas, the administrative process (variances, complaints, hearings) as well as specific architectural requirements, reference to 521 CMR should be made.

A series of amendments to the MAAB regulations were proposed on February 17, 2005. These amendments became effective July 27, 2006 and must be adhered to in all new construction and renovation projects.

III. EVALUATION OF PROGRAMS AND SERVICES (SELF-EVALUATION)

Introduction

All local governmental entities were required to complete a self-evaluation of their facilities, programs, policies, and practices by January 26, 1993. The self-evaluation identifies and corrects those policies and practices that are inconsistent with Title II's requirements. Self-evaluations should consider all of a municipality's programs, activities, and services, as well as the policies and practices that it has put in place to implement its various programs and services. Remedial measures necessary to bring the programs, policies, and services into compliance with Title II should be specified - including, but not limited to 1) relocation of programs to accessible facilities; 2) offering programs in an alternative accessible manner; 3) structural changes to provide program access; 4) policy modifications to ensure nondiscrimination; and 5) auxiliary aids needed to provide effective communication.

A self-evaluation was conducted of those municipal departments which offer programs or provides services to the general public. A memo and accompanying survey form (See Appendix B) was sent to 19 different departments, boards, commissions and individuals who were identified as either providing a service or program to area residents. This included the following: town clerk, Asa Waters Mansion Director, treasurer, board of selectmen, tax collector, assessors, board of health, library, planning board, police, fire, highway, town accountant, parks and recreation, building inspector, conservation commission, council on aging, school department and veterans agent. .

Information from each survey response, along with supplemental departmental information was used to develop the self-evaluation. Together with the structural assessment (Section IV) and policy recommendations (Section V), an accessibility compliance plan for the Town of Millbury is achieved. However, there are general required administrative actions which Millbury must adhere to in order to successfully comply with the Federal ADA. This includes:

- appointment and active participation of a Town ADA Coordinator
- ADA education, notification and outreach
- adoption and formal notice of an ADA grievance procedure
- developing program strategies to achieve community services compliance
- maintenance and upkeep of accessible features.

ADA Coordinator

It does not appear that the Town of Millbury has formally appointed anyone to serve as its ADA Coordinator as specified under 28 CFR 35.107 (a). In the late 1990's, the Board of Selectmen designated the building inspector at that time as the ADA Coordinator. Under Section 8.5 (e) (1) of the Millbury Home Rule Charter, the Town Manager has the authority to appoint all other officers, department heads and employees for whom no other method of selection is provided. As an ADA Coordinator is not specifically addressed elsewhere in Charter, it would be appear to

be within the realm of the Town Manager to make such an appointment. This appointment is essential and an integral part of full compliance under the ADA. The role of the ADA Coordinator is extensive and includes:

- insuring overall compliance with the ADA
- notification and outreach
- addressing grievances as filed under the town's established grievance policy
- insuring timely implementation of the town's transition plan
- on-going assessment of programs and services
- serving as a technical advisor and resource on accessibility matters.

In order for the town to successfully comply with the intent of the ADA, it is critical that the appointed ADA Coordinator take a pro-active role in performing his/her role. It is not adequate for the ADA Coordinator to serve only as a decision-making authority under the town's ADA grievance procedure. The ADA Coordinator must monitor daily and long-term compliance with the town's ADA policies, procedures, and plans. This includes ADA compliance and assurance pertaining to postings, employment practices, education, dissemination of literature to the public and private businesses, daily activities and practices of town government, serving as a town-wide resource on accessibility matters and issues, and staying current on changes in state and federal law, regulations, programs, policies, interpretations, and decisions which affect the disabled.

Education, Notification and Outreach

In addition to the policies recommended in Section V of this Accessibility Plan, the town must undertake a formal education, notification and outreach process which includes the general public and town departments, boards, and commissions. This should consist of education and information ranging from general information about the ADA to reasonable accommodations. Notices pertaining to the town's grievance procedure (detailed later), equal opportunity policy, communications and program/services access should be posted in all public buildings, included in town documents and reports where appropriate and listed on the town's web site. It may be necessary to develop an audiotape version of these policies and procedures for the sight impaired. Similarly, all postings and advertisements for employment, including formal job descriptions, must include references to non-discrimination on the basis of disability. The town's Affirmative Action Policy Statement does contain an equal employment opportunity statement that includes a reference to nondiscrimination on the basis of a handicap. Recommended policies for town adoption are included in the Appendices.

The town, through its ADA Coordinator, must also insure that effective communication is achieved through the use of available resources and local policy implementation. It is recommended that, at a minimum, the town general government install a TTY/TDD (est. \$350) at Town Hall to allow a centralized communication point to town services. In the future, as the need dictates, the acquisition of a Braille Embosser (est. \$2,500) would allow the town to disseminate public information, as necessary, to the sight impaired as required under the ADA.)

Hiring and Employment Practices

Under the ADA, it is discriminatory to use selection criteria that screen out or tend to screen individuals with disabilities unless the criteria are shown to be job-related for the position in question and are consistent with business necessity. This is to ensure that tests do not act as barriers to the employment of persons with disabilities unless the person is unable to do the job, even with reasonable accommodation. Employers should design selection criteria for jobs to ensure a close fit between the selection criteria and an individual's ability to do the job.

Job postings and advertisements must be placed in locations that are accessible to persons with mobility impairments. Postings and notices should be done in large print format and should include both a regular telephone number and a TDD number. In addition, interviews must be conducted at an accessible location.

Job applications are considered to be pre-employment inquiries under the ADA. Its purpose is to gather information on the skills, abilities, training, credentials, and references of the applicant. It also serves to identify where an applicant can be reached. It cannot be used to elicit information about whether an applicant is an individual with a disability or as to the nature or severity of such disability. Under the ADA, a person is considered a qualified individual with a disability if he or she can perform the essential functions of the job with or without reasonable accommodation. Although the ADA does not require an employer to have job descriptions, they can be used as evidence of the essential functions of the job.

Although job testing is not prohibited under the ADA, it requires that testing be job related and consistent with work necessity. Tests which measure aptitude, physical agility, intelligence, and specific skills are not considered to be "medical examinations" under the ADA. Medical examinations are prohibited until after a job offer has been made to an applicant. Test results cannot be used to exclude an individual with a disability unless

- the tested skill is necessary to perform an essential function of the position, and
- there is no reasonable accommodation that can be made available to enable the individual to perform that essential function, or
- providing the necessary accommodation would cause undue hardship.

Job Descriptions

The Town, through its current Town Manager, has begun to revise many of its job descriptions for town employees. These newer job descriptions reflect a comprehensive description which includes "essential duties and responsibilities, essential training and experience required to perform essential functions and minimum physical and mental abilities required to perform essential functions". Furthermore, these descriptions clearly state that reasonable accommodations will be made to enable individuals to perform the essential functions of a position. It is critical that this effort be continued to cover all municipal job descriptions.

ADA Grievance Procedure

The ADA Title II regulations require that all municipalities with 50 or more employees (regional school systems must prorate the number of employees for each member community) adopt and publish grievance procedures. The purpose is to encourage local resolution of complaints concerning employment, services, programs and activities. It is important to note that complainants are not required to exhaust the municipality's procedures before filing a federal complaint or taking court action.

The regulations do not stipulate time frames or procedures for the grievance procedure, however, the following are recommended:

- A detailed description of the procedures for submitting a complaint;
- A two step review process which allows for appeal;
- Reasonable timeframes for review and resolution of the complaint;
- Good record keeping for all complaints submitted and documentation of steps taken toward resolution.

The Town of Millbury does not have an ADA Grievance Procedure as required under the ADA. A sample grievance procedure for adoption by the Board of Selectmen is provided in Appendix D.

Programs/Services

Public programs and services must be provided in a manner that does not discriminate against those with disabilities or prevent them from accessing such service or program. Thus, it is critical for all departments, commissions and boards to fully disclose all activities and be readily able to adapt or respond to specific requests. Based on the survey responses received as well as a review of departmental and board operations, the various departments and boards are attempting to comply with the needs of all town residents, including those with disabilities. However, in most cases, there exists an unawareness of what actions or procedures are required or which may be allowed. Many of the departments, commissions and elected officials noted that their business with the general public was done via telephone, mail, fax, and in person. Some departments/boards did note that modifications and/or reasonable accommodations are addressed "informally" in a timely manner. Typically this has meant meeting a person in an accessible location provided that advance notice has been given. However, in these instances as well as with other certain "practices" which are in place to accommodate special needs, procedures and policies should be formalized and published for all citizens to be familiar with. As a matter of practice, the town's ADA related procedures and policies should be included in the Town Annual Report and posted on the Town's website.

For example, a hearing impaired individual may want to attend a lecture on wetlands sponsored by the conservation commission. In addition to providing a sign-language interpreter, an acceptable accommodation may be to provide a copy of the lecture in print for the individual to read. This must be done at no cost to the individual. The town should also consider the purchase of either an assistive listening device (ASD) or a personal amplifier system to enable those with aural limitations to more effectively participate in public meeting settings.

Currently town meetings are held at the Jr./Sr. High School. This facility does not meet minimum accessibility standards for parking, building access, seating and audio limitations. Specific improvements are required to insure full compliance. This is addressed in more detail on page x of this plan.

Maintenance and Upkeep

The Town of Millbury must maintain in operable working condition those features that are necessary to provide access to services, programs, and activities. This includes door closers, sidewalks, parking space signage and striping, and ramps, among many other things. Isolated or temporary interruptions in service or access are permitted for maintenance or repairs. However, this is deemed as short-term and not of a semi-permanent or seasonal nature.

When weather conditions such as snow and ice limit or prevent access to services, programs, and activities to or within a facility, access must be maintained to ensure that those programs are accessible. Maintenance of accessible features include the removal of snow from accessible parking spaces, curb ramps, accessible routes of travel, and entrances. Although temporary interruptions in services due to bad weather are expected, alternate services must be provided if snow and ice cannot be cleared in a timely manner. Snow removal and removal of other obstructions within the accessible route of travel must be done to a minimum width of 36". Similarly, if an elevator, lift or similar accessible-related device is not working properly and is denying access, repairs must be made in a timely manner. In the interim, alternative services must be provided.

Evaluation of Programs and Services

<u>Department</u>	<u>Programs/Services</u>	<u>Accessibility Issues</u>	<u>Current Actions</u>	<u>Needed Actions</u>
Department of Public Works DPW – Administrative	Overall administration is conducted out of the Director's office located in the Municipal Office Building. Meetings and interaction with the public and obtaining of any permits can be conducted through this office. The administrative operations include general oversight of the department, problem resolution, meetings, handling complaints, billings. Maintenance and upkeep of various records, plans and documents pertaining to infrastructure and public ways	See Municipal Office Building comments.	None.	None.
DPW – Highway	Highway functions include maintenance of highways/roads, sidewalks, catch basins and related storm water drainage systems.	The highway garage is not open to the public.	None.	None.
DPW – Sewer	Sewer department responsibilities involve collection and treatment of residential, public facility, business, and commercial wastewater.	The wastewater treatment facility is not open to the public.	None.	None.

<u>Department</u>	<u>Programs/Services</u>	<u>Accessibility Issues</u>	<u>Current Actions</u>	<u>Needed Action</u>
Fire Department	Prevention, detection and suppression of fire in the Town of Millbury. Issuance of various permits under MGL 148. Response to miscellaneous public service needs and requests. The Department currently consists of roughly 65 "call" firefighters, one chief, four assistant chiefs and one full-time clerk. The department is overseen by a Board of Fire Engineers.	The Fire Headquarters at 126 Elm Street does not meet current accessibility requirements. Stations 2, 3 and 5 although all on one level are for vehicle and equipment storage and are not open to the public. Transactions with the public are done in person, by mail and telephone. Permits are issued at Fire Headquarters.	None.	Develop standard policies for handling requests for modifications and/or assistance. Provide any informational literature in large print format. Initiate construction improvements as detailed in Section IV.
Council on Aging	Weekly social events/programs, social security and health professional representatives, coordination of day trips, coordination of weekly congregate lunch program, and other related services.	Basic building accessibility requirements are met, however limitations exist to certain services including parking, bathrooms, exterior routes of travel, and others. Modifications are required to meet current accessibility guidelines.	Assistance provided to seniors as needed.	Develop standard policies for handling requests for modifications and/or assistance. Initiate construction improvements as detailed in Section IV.
Library	Book circulation, reading programs, educational services and programs, workshops	Basic building accessibility requirements are somewhat met, however limitations exist to certain services including bathrooms, card catalogues, computers and work tables. Modifications are required to meet current accessibility guidelines.	Audio books, CD Roms, CD's, videos, large print materials.	Initiate construction and equipment improvements as detailed in Section IV.
School Department	Educational services to grades K-12. Location for numerous school-related meetings, activities, and events as well as community-wide activities.	Basic building accessibility requirements met in most of the facilities. Refer to building assessment for specific areas of non-compliance.	Special educational needs are addressed in compliance with state and federal education and S. 504 requirements.	Initiate construction improvements as detailed in Section IV to insure full program accessibility.

Municipal Office
Building – Main Level

The following departments/commissions/boards are located in the Municipal Office Building, which serves as the primary location for general government activities in the Town of Millbury. Each of these, although substantially different in function, provide mostly administrative activities and primarily offer direct services to the general public who visit their respective office in the Municipal Office Building. None of the departments have initiated any specific policies or procedures relative to individuals with disabilities. General postings and notices are made within the building relative to any building procedures and practices. Most department employees noted that although individual department policies and procedures are not in place, they are generally aware that program modifications may be necessary to assist the disabled. Public interaction occurs through direct communication, telephone, regular mail, e-mail and internet (web site). The town's website should be modified to insure usage via multiple browsers as well a valid HTML. The building generally meets basic accessibility standards, however access to some departments and offices do not provide equal access due to insufficient clear width space within offices/departments and service counters which exceed allowable height standards. In addition to general building use, each department should develop standard policies for handling requests for modifications and/or assistance. Each department should also provide any informational literature in large print format. A TTY/TDD for building-wide use should be purchased and installed in the Office of the Board of Selectmen. In addition, an ALD or personal amplifier system should be purchased for use by those with aural limitations. *Note: All public and town meetings and local, state and federal elections must be conducted in full compliance with accessibility laws and regulations. Currently, the use of the high school for town meetings does not comply (refer to high school building assessment).* Program accessibility will be achieved through the initiation of those construction improvements as detailed in Section IV.

Conservation Commission	Conduction of public meetings and hearings on wetlands issues under MGL C.131 s.40. Issuance of orders of conditions and determinations of applicability. Response to various technical assistance and information requests pertaining to wetlands and conservation matters.
Finance Director	Record keeping, account reconciliation, overall financial administration and oversight of the town's finances. Interaction/communication through mail, fax, telephone, and e-mail. Meetings as may be required in the Board of Selectmen's Office/Meeting Room.
Planning Board	Deliberations and public meetings and hearings on subdivisions, plan approval not required plans, and site plan review applications. Provision of technical assistance on various land use, planning, and zoning matters.
Board of Health	Interpretation and enforcement of Title V of the State Environmental Code; inspections of food service establishments; health and safety inspections for residential and commercial properties; response to various technical assistance and information requests pertaining to health, safety, and septic system issues and concerns, assistance with the transfer station/recycling center.
Zoning Board	Deliberations on special permits and variance requests; response to requests on zoning matters; conducts meetings hearings on appeals of decision of the Zoning Enforcement Officer.
Building Inspector	Interpretation and enforcement of the State Building Code; issuance of building and occupancy permits; oversight and coordination of electrical and plumbing inspection services, zoning bylaw enforcement officer; issuance of various written determinations and decisions; response to various technical assistance and information requests.
Assessors	Prepares annual tax recapitulation sheet; provides general real estate tax information; processes requests for abatements and exemptions; determines assessments on real estate, personal property, and vehicles; responds to requests for information.

Treasurer	Responsible for employee benefits, payroll, administration of municipal finances; payment of bills/invoices, obtaining loans, involvement with various municipal cash management matters.
Tax Collector	Collection of municipal taxes, assessments and other relevant fees.
Town Clerk	Issuance of a variety state and town licenses, permits, and certificates; provision of information to the public on local and state government; voter registration and election assistance; provision of information on vital statistics and elections; maintains annual town census.
Board of Selectmen/Town Manager	Town manager serves as chief administrative officer of the town; overall responsibilities of the office includes issuance of certain licenses governing the sale of liquor, food, sales of motor vehicles, and entertainment; contract negotiation and oversight; personnel administration; interact, contract, and resolve various state, federal, and local issues of concern.
<u>Municipal Office Building - Lower</u> Police Department	Emergency and police response and patrol. Issuance of firearms identification cards and license to carry firearms cards. Public education on safety, drugs, domestic violence, etc. Accident and criminal investigations. Information dissemination. Public interaction through person, telephone, TTY, language line services for interpreters and mail. Other assistance upon request. Develop standard policies for handling requests for modifications and/or assistance in the police department. Provide any informational literature in large print format.

IV. ARCHITECTURAL BARRIERS (TRANSITION PLAN)

Format

The Town of Millbury, in accordance with the Americans with Disabilities Act of 1990 (ADA) regulations, has surveyed its municipal buildings and facilities to document physical barriers to access as part of the requirements for developing a transition plan. The buildings and facilities which were assessed, as dictated by the town, consist of four different categories. These are town center (buildings and central business district streets and sidewalks), school buildings, parks and recreation facilities and public housing. A detailed listing of properties is provided below.

<u>Category</u>	<u>Description</u>	<u>Properties</u>
Active Recreation Areas and Playgrounds	Included in this category are the town's playgrounds, ball fields, and active recreation areas.	Millbury Junior/Senior High School field and track; all public school playgrounds and playing fields; Windle Field; Washington Street Park; Jacques Park, Greenwood Street Park, East Millbury Park, Dorothy Pond Tot Lot, and any other public playgrounds, playing fields, basketball courts and recreation facilities under the control of the Millbury Board of Parks Commissioners or the Town.
School Buildings	Public school buildings located within and under the sole jurisdiction of the Town of Millbury.	Elmwood Street School; Raymond E. Shaw School; Millbury Junior/Senior High School; Dorothy School Building.
Town Center Public Buildings and Facilities	Municipally owned buildings and facilities which are open to the public on a regular basis, provide specific services or activities, or are available for use by town residents.	Municipal Office Building, Police Station, Asa Waters Mansion, Old High School (McGrath Education Center), Public Library, Central Fire Station, Senior Center, Town Common, Central Business District Streets and Sidewalks.
Millbury Public Housing	Public housing development and housing units of the Millbury Housing Authority, large multi-family rental housing developments that contain affordable units developed under the provisions of MGL c.40B or the affordable housing provisions of the Millbury Zoning Bylaw.	Elderly Housing Apartments (Linden, Colonial, Centerview, Congregate Housing and Adult Day Health Care); Family Housing Units (Memorial Drive – 25 cape cod houses, 13 units); Affordable Units (Cordis Mills Apartments – 22 units).

This section contains the following elements, which fulfill the requirements for the preparation of a transition plan:

- identification of physical obstacles in the town's facilities that limit the accessibility of its programs or activities to handicapped persons, and
- a description of methods or type of action to be taken to eliminate identified obstacles, and
- general cost parameters for each action to be taken, and
- establishment of a recommended completion date to achieve accessibility, and
- identification of the person, department or board responsible for implementation.

Limitations of Transition Plan

The plan does not address what is accessible, but rather obstructions to mobility. Fieldwork was performed during the months of January through July 2006. Although general recommendations are made as corrective actions to eliminate identified obstacles, it is expected that the town will be solely responsible for designing the specific construction solution in accordance with 521 CMR: Architectural Access Board Regulations or the ADAAG, whichever is appropriate.

As part of the transition plan assessment, deficiencies or limitations to access were identified at each location. The actions noted in this plan to be taken in removing obstacles to mobility or access are descriptive and are not intended to be construction specifications. The specific construction action can vary substantially depending on desirability and type of materials. In addition, historically significant properties can result in additional cost due to more architecturally sensitive construction alternatives. As a result, the costs can vary accordingly. The party responsible for implementing the identified action will be responsible for working with the town's building inspector and a design professional, if necessary, so as to ensure compliance with 521 CMR and/or the ADAAG. Where appropriate, due to historic considerations, building configuration, or extent of use, a combination of programmatic solutions and construction alternatives are provided. Such measures are in full compliance with Title II of the ADA.

Recreational Facilities and Playgrounds

Recreational facilities and playgrounds must also comply with the Americans with Disabilities Act and the Massachusetts Architectural Access Board regulations (521 CMR). Existing sites where renovation is not yet planned must still meet the requirement of "program accessibility". For example, the "program" of playgrounds or any services offered at that location must be accessible. The Federal Architectural and Transportation Barriers Compliance Board has issued final accessibility guidelines to serve as the basis for standards which are being adopted by the Department of Justice for new construction and alterations of play areas covered by the Americans with Disabilities Act. The guidelines include scoping and technical provisions for ground level and elevated play components, accessible routes, ramps and transfer systems, ground surfaces, and soft contained play structures. The guidelines are intended to insure that newly constructed and altered play areas meet the requirements of the ADA and are readily accessible to and useable by individuals with disabilities.

Both the Federal ADA and Massachusetts AAB regulations require that playgrounds have an "accessible route" to reach playground equipment and around the playground area. Similarly, other recreational facilities must be accessible for programs and must comply with all other provisions of the ADA or AAB. For example, parking, toilet facilities, routes of travel, fixed seating, and other applicable items must be accessible to those with disabilities.

The focus of this transition plan is on program accessibility and related compliance. All future renovations or proposed new construction must fully comply with the Federal guidelines for recreation and play areas.

Feasibility (F)

Each architectural barrier has been ranked according to the feasibility of removing that particular barrier. The feasibility rankings are somewhat subjective and are based on a perceived degree of difficulty or skill level required to remove an architectural barrier. These rankings are as follows:

<u>Ranking</u>	<u>Description</u>
1	Can be easily undertaken (i.e. move furniture, put sign on a wall)
2	Can be undertaken by maintenance staff, DPW, etc. (i.e. install post and sign, move dispensers, adjust door closer, change door hardware)
3	Minor modifications which require skilled or specialized work (build ramp, alarm installation, sink/toilet installation, etc.)
4	Major modifications which require skilled or specialized work (structural changes, building additions, elevators/lifts, etc.)

Priority (P)

Each architectural barrier has also been ranked according to the priority of removal based upon the type of access that is affected. The priority rankings (#1 being the highest priority and #4 being the lesser priority) are determined by the ADA and are defined as follows:

<u>Ranking</u>	<u>Description</u>
1	Physical entrance into a building
2	Access to programs and services within a building
3	Access to bathroom facilities
4	Removal of remaining architectural barriers

Costs

Cost estimates are based on projects of similar nature, unit quantity pricing (where appropriate), and R.S. Means Company, Inc. ADA Compliance Pricing Guide 2nd Edition (2204). Cost estimates are also based on the type and complexity of work. It is being assumed that simple changes (Feasibility ranking of 1 or 2) will be made through the use of town personnel (custodial, DPW, etc.). More complex construction or those projects requiring specialized skills (Feasibility ranking of 3 or 4), would involve private contractors and include labor, overhead, and profit.

Use of the Transition Plan

This plan is intended to be a working document. If a barrier was overlooked it can easily be added to the plan. Programs and services can be modified and adapted over time as needed. Similarly, policies and procedures can be modified and adopted to reflect current legislative requirements. Actual construction methods to arrive at a solution for an identified problem may

vary depending on final plans and specifications. The town should use this plan as a guide for compliance and modify it as needed without altering its initial intent and efforts of compliance. In addition, the inventory of barriers can be used in concert with the town's capital budget process to assist in the determination of how and when to proceed with the many suggested improvements.

Some Basic Accessibility Requirements (ADAAG and 521 CMR AAB)

Parking

- 8' wide space w/minimum 5' wide access aisle for cars and 8' wide access aisle for vans
- signage w/accessibility symbol
- 8'2" minimum height clearance for van accessible spaces
- hard, stable, slip-resistant surface w/a maximum cross-slope of 2% (1:50)
- space(s) must be located on the shortest accessible route of travel to an accessible facility entrance
- in general, 1 accessible space is required for every 25 total spaces
- 1 in every 8 accessible spaces, but not less than 1 space shall be van accessible

Accessible Route

- hard, stable, firm, slip-resistant surface
- 36" minimum width
- walkways require a 48" minimum width w/a 36" minimum clear width
- maximum 5% running slope (1:20)
- maximum 2% cross-slope (1:50)
- no objects between 27" and 80" above finish floor (a.f.f.) shall protrude more than 4" into the pathway
- 60" x 60" passing space every 200' if pathway is less than 60" wide
- handrails on both sides of pathway required if slope exceeds 5% (maximum 1:12 or 8.3% allowed)

Ramps

- maximum 8.3% running slope (1:12)
- maximum length of a ramp run between landings shall not exceed 30'
- 48" minimum clear width measured between the railings
- slip resistant surface
- base of ramp flush with adjacent hard and stable surface (i.e. pavement, concrete)
- 60" level area at base, all landings and top, as wide as the ramp
- 60" x 60" minimum landing wherever ramp changes direction
- continuous handrails on both sides, 1-1/4" to 1-1/2" in outside diameter, and round or oval in shape
- handrails must extend 12" beyond the top and bottom of the ramp
- handrails shall be provided in pairs, one at a height of 34" - 38" above the ramp surface and the lower handrail at a height between 18" and 20" and 1-1/2" from a wall or mounted surface

Curb Ramps

- 36" minimum width
- slip-resistant, stable, firm surface
- maximum 8.3% running slope (1:12)
- maximum 2% cross-slope (1:50)
- maximum 10% slope (1:10) for flared sides
- base of slope flush with street paving
- curb ramps are required on both sides of a street when connected by a crosswalk and at each corner of an intersection
- no obstructions should exist within curb ramp or approach to curb ramp (i.e. utility pole, traffic light pole, sign, etc.)

Entryways

- 32" minimum clear opening width
- 18" of clear space on the pull side of the door
- 12" of clear space required on the push side of the door
- 1/2" maximum beveled threshold
- accessible hardware required such as lever handles, loop handle, push plate, panic bar, or automatic door openers
- 60" level surface inside and outside of door at entrances (may be reduced depending on approach, push or pull, presence of door opener)
- door closers must operate such that the sweep period of the closer from an open door position of 90 degrees to closure shall take at least six seconds
- exterior hinged doors must not exceed a force of 15-lb. to pull or push open
- interior hinged doors must not exceed a force of 5-lb. to pull or push open

Controls

- for a forward reach approach, the height shall be between 15" and 48" a.f.f.; for a side reach approach, the height shall be between 9" and 54" a.f.f.

Bathrooms

General

- slip resistant flooring
- 60" diameter clear turning space
- 30" x 48" clear space in front of sink
- bottom of mirror shall be at a maximum of 40" a.f.f.

Sink

- maximum height of 34" to rim, minimum of 22" from wall to front of sink, minimum 27" clear knee space below rim, bowl depth not to exceed 6"; all pipes below sink must be wrapped; faucets must be operable with one hand or a closed fist; self-closing valves shall remain open for at least ten seconds.

- Dispensers • towel dispensers, drying devices and similar devices must be operable with one hand or a closed fist at a maximum height of 42" a.f.f.; toilet paper dispensers shall be at a minimum 24" a.f.f and within 36" of the rear wall
- Toilet • the centerline of the toilet shall be 18" from the nearest side wall and at least 42" from the farthest side wall; toilet seat shall be 17" to 19" a.f.f.; flush valve is to be on the approach side of the toilet
- Urinal • accessible urinals shall be stall-type or wall-hung with an elongated rim at a maximum height of 17" a.f.f.; flush valve on the approach side at a maximum height of 44" a.f.f.
- Grab Bars • 2 grabs 42" long, one located at the back wall and one located on the side wall; 1-1/4" to 1-1/2" in outside diameter with a clearance of 1-1/2" from the wall; non-rusting or acid-etched or roughened; capable of resisting 250 lbs. of force and set at a height of 33" to 36" a.f.f.

Public Buildings: Town Hall

Name: Town Hall

Location: Elm Street

Function: Municipal office building.

Responsible Party: Board of Selectmen

General Description or Obstacle Which Limits Mobility or Access: The building as a whole is marginally accessible, with a number of required modifications for full accessibility compliance. This includes interior program access limitations, non-compliant bathrooms, and other miscellaneous concerns. As a whole, accessible compliant signage does not exist. All offices have inappropriate door hardware to access individual departments or offices. In order to better utilize space, a number of offices have discontinued using a door directly to the hallway and instead use an alternate access through an adjoining larger office to access their individual office. In these instances accessible routes of travel do exist to get to the individual offices, thus hardware changes on these doors may not be required unless they are put back into use as a public means of access/egress. There are various obstructions throughout some of the individual offices as well in some designated public information areas which restrict the accessible route of travel and minimum clear width space. In most, if not all cases, these are non-structural objects which can easily be moved to conform to the minimum standards. At least three offices (assessor, clerk, treasurer/collector) have counters which exceed allowable heights. In addition, some offices (board of health, clerk, assessors) have meeting and public work tables that don't meet the minimum knee clearance requirement. The employee lounge, although accessible into and within the designated room, has elements (wall cabinets, sink) that are non-compliant. As this is a non-public space, it may be necessary in the future to modify these elements as an accommodation by lowering the wall cabinets and hardware and providing sufficient knee clearance under the sink. Both the men's and women's bathrooms require extensive modifications to attain full compliance.

Description of Programs: Administrative offices of general town government, place of public assembly.

Accessibility Compliance Options: Initiate improvements and remove architectural barriers as specified.

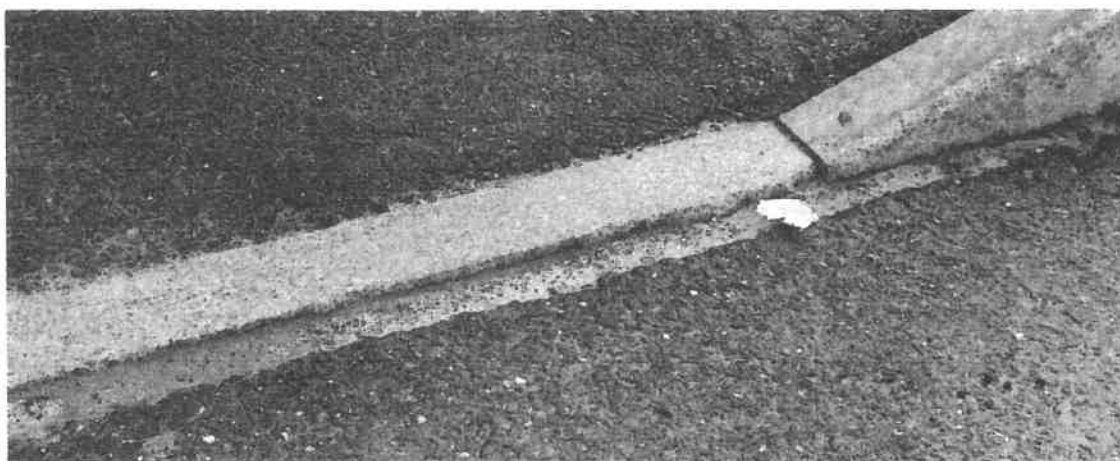
Estimated Total Project Cost: \$ 36,050

Projected Completion Date: June 2009

<u>General Description of Obstacle Which Limits Mobility or Access</u>	<u>ADAAG Compliance</u>	<u>MA 521 CMR Compliance</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>Cost Estimate</u>
1. No van accessible signage provided.	S. 4.6	S. 23	Designate one 8' wide (minimum) parking space w/ 8' wide van accessible access aisle. Provide related striping and accessible signage (van and passenger vehicle) – sign height to be 5" minimum and 8" maximum a.f.f. to top of sign.	1	2	\$150
2. No curb cut and ramp exists from the parking lot to the sidewalk leading to Elm Street and war memorial.	S. 4.7	S. 21	Provide fully compliant accessible curb ramp.			\$1,300
3. The accessible route is compromised at the curb ramp to the town hall due to a roughly 2" "gap" and 1/4" change in level between the asphalt parking lot and the granite edging.	S. 4.3 S. 4.7	S. 20 S. 21	Patch with bituminous concrete to eliminate gap, creating a smooth transition and level surface.	1	2	\$100
4. The flared sides of the curb ramp are at 11.9% and 12% respectively which exceeds the maximum 10% threshold.	S. 4.7	S. 21	Construct a concrete ramp to comply with maximum slope requirements.	1	2	\$1,200
5. Two portable hallway coat racks exceed the maximum 54" a.f.f. for a side approach.	S. 4.2	S. 34	Purchase or install two coat racks with a maximum height of 54" a.f.f.	4	2	\$200

Town Hall continued

6.	Interior door hardware to roughly 28 offices and work area are knob-style and non-compliant. Hardware should be easily operable by one hand or a "closed fist".	S. 4.13	S. 26	Replace door hardware with lever-type hardware or other accessible compliant hardware.	2	2	\$2,500
7.	Lack of interior accessible signage to the various office and rooms as well as bathrooms.	S. 4.30	S. 41	Install accessible compliant signage (approximately 19 signs required) with appropriate finish and contrast and character height and proportions. Raised and Brailled characters should also be included. Signage should be mounted at 60" a.f.f. o.c. adjacent to the latch side of the door(s).	2	1	\$1,100
8.	The public counter height of the town clerk, treasurer/collector and assessor offices exceed the maximum height allowance and do not meet the minimum counter width requirement.	S. 4.32	S. 7	Construct a minimum 36" wide counter below the window of each office with a maximum height of 34" and a minimum of 27" knee clearance.	2	3	\$1,200
9.	The tables used as public work and meeting space in the health department, assessors and town clerk offices provide only 26 ¼", 26 ¼" and 24 ½" of knee clearance space, respectively.	S. 4.32	S. 35	Modify existing tables to comply with required 27" knee clearance requirement. (Note: Public work tables outside assessors office should be moved at least 1' away from door to provide better maneuverability).	4	3	\$450
10.	Drinking fountain in hallway protrudes more than 4" into the hallway. Existing fountain does not provide sufficient minimum 27" knee clearance. No companion "high" drinking fountain provided.	S. 4.15	S. 36	Install new high/low accessible compliant drinking fountain with maximum spout height of 36" a.f.f. for low and 43" a.f.f. for high fountain. Construct wing or flange wall on side(s) of drinking fountain to minimize protrusion to a maximum of 4".	4	3	\$4,150
11.	First floor large meeting room – small kitchen area in hallway area has wall cabinets with a bottom height of 50" a.f.f. Sink exceeds maximum height by 1 ¼" and does not provide knee clearance space below. Towel dispenser exceeds reach limits. The lunch/break tables provide only 26 ¼" of knee clearance.	S. 4.2 S. 4.32 S. 4.19	S. 32 S. 35 S. 6	Lower wall cabinets such that the bottom height does not exceed 48" a.f.f. with hardware mounted at the bottom of the cabinet door. Provide an accessible sink area at a maximum height of 34" a.f.f. with pipes wrapped below and with minimum 30" wide, 27" high, 19" deep knee space. Relocate dispenser to comply with forward and side reach requirements, depending on relocation. Modify at least one table to comply with required 27" knee clearance requirement.	4	3	\$1,200



Town Hall continued



12. Men's bathroom –lack of accessible signage; the bathroom door closes from an open door position of 90 degrees to closure in approximately four seconds, which exceeds the six second maximum threshold; the push/pull force exceeds the maximum threshold by 5 lbs.; the towel dispenser is mounted at 60" a.f.f. which exceeds the height requirement; the grab bars are 32" long, which is 10" shorter than required; the bottom of the mirror is 47 3/4" a.f.f. which is too high; the sink, water closet and urinal are wholly non-compliant in regards to height, set-back, clearance and approach requirements.

S. 4.13
S. 4.16
S. 4.19
S. 4.26
S. 4.27
S. 4.30
S. 30
S. 41

Construct a fully compliant accessible bathroom to comply with the following: signage – install accessible compliant signage with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included, signage should be mounted at 60" a.f.f.; door – adjust door closer to meet the six second maximum closing speed and 5 lbs. push/pull force thresholds; sink – maximum height of 34" to rim, minimum of 22" from wall to front of sink, minimum 27" clear knee space below rim, bowl depth not to exceed 6"; all pipes below sink must be wrapped; faucets must be operable with one hand or a closed fist; self-closing valves shall remain open for at least ten seconds; dispensers – towel dispensers, drying devices and similar devices must be operable with one hand or a closed fist at a maximum height of 42" a.f.f.; toilet paper dispensers shall be at a minimum 24" a.f.f. and within 36" of the rear wall; toilet – the centerline of the toilet shall be 18" from the nearest side wall and at least 42" from the farthest side wall; toilet seat shall be 17" to 19" a.f.f.; flush valve is to be on the approach side of the toilet; urinal – accessible urinals shall be stall-type or wall-hung with an elongated rim at a maximum height of 17" a.f.f.; flush valve on the approach side at a maximum height of 44" a.f.f.; grab bars – 2 grabs 42" long, one located at the back wall and one located on the side wall; 1-1/4" to 1-1/2" in outside diameter with a clearance of 1-1/2" from the wall; non-rusting or acid-etched or roughened; capable of resisting 250 lbs. of force and set at a height of 33" to 36" a.f.f.; general – slip resistant flooring, 60" diameter clear turning space, 30" x 48" clear space in front of sink, bottom of mirror shall be at a maximum of 40" a.f.f.; install audible and visual alarm.

3 4 \$11,500



Town Hall continued

13. Women's bathroom –lack of accessible signage; the bathroom door closes from an open door position of 90 degrees to closure in approximately four seconds, which exceeds the six second maximum threshold; the push/pull force exceeds the maximum threshold by 2 lbs.; no audible and visual alarm is provided, water closet stall door opens in, not out; the towel dispenser is mounted at 60" a.f.f. which exceeds the height requirement; the grab bars are 32" long, which is 10" shorter than required; the sink and water closet are wholly non-compliant in regards to height, set-back, clearance and approach requirements.
- S. 4.13 S. 30
S. 4.16 S. 41
S. 4.19
S. 4.26
S. 4.27
S. 4.30



Construct a fully compliant accessible bathroom to comply with the following:
signage – install accessible compliant signage with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included, signage should be mounted at 60" a.f.f.; door – adjust door closer to meet the six second maximum closing speed and 5 lbs. push/pull force thresholds; sink – maximum height of 34" to rim, minimum of 22" from wall to front of sink, minimum 27" clear knee space below rim, bowl depth not to exceed 6"; all pipes below sink must be wrapped; faucets must be operable with one hand or a closed fist; self-closing valves shall remain open for at least ten seconds; dispensers – towel dispensers, drying devices and similar devices must be operable with one hand or a closed fist at a maximum height of 42" a.f.f.; toilet paper dispensers shall be at a minimum 24" a.f.f. and within 36" of the rear wall; toilet – the centerline of the toilet shall be 18" from the nearest side wall and at least 42" from the farthest side wall; toilet seat shall be 17" to 19" a.f.f.; flush valve is to be on the approach side of the toilet; grab bars – 2 grabs 42" long, one located at the back wall and one located on the side wall; 1-1/4" to 1-1/2" in outside diameter with a clearance of 1-1/2" from the wall; non-rusting or acid-etched or roughened; capable of resisting 250 lbs. of force and set at a height of 33" to 36" a.f.f.; general – slip resistant flooring, 60" diameter clear turning space, 30" x 48" clear space in front of sink, bottom of mirror shall be at a maximum of 40" a.f.f.; install audible and visual alarm; reverse swing of water closet stall door.

3 4 \$11,000

Public Buildings: Police Station

Name: Police Station

Location: Elm Street

Function: Police station, detention facility, administrative office.

Responsible Party: Police Dept.

General Description or Obstacle Which Limits Mobility or Access: The police station does not meet current accessibility requirements. There exists no designated handicapped accessible parking spaces for station visitors. The curb ramp from the parking lot is not fully compliant due to a 3 1/4" wide gap between asphalt and concrete as well as a 1 1/4" abrupt elevation change. The counter height at the dispatch reception window is constructed at 42" above finish floor and therefore exceeds the maximum height requirements. All internal doors (roughly 16) including the main internal entrance door into the department have non-compliant knob-style hardware. There are various obstructions throughout the station which restrict the accessible route of travel and minimum clear width space. In most, if not all cases, these are non-structural objects which can easily be moved to conform to minimum standards. The "public" bathroom is wholly non-compliant as is a drinking fountain located in the hallway adjacent to the bathroom door. The 3 male and 3 female holding cells are also wholly non-compliant. The non-public areas of the station including the break room, women's locker room (including bathroom and shower), men's locker room (including bathroom and shower) and other spaces within the station do not meet current accessibility requirements. As these are not public spaces and police personnel would be required to meet certain minimum physical requirements to be on the force, modifications would be dependent on those required for "reasonable accommodations". Because of the limited "public" access to and within the station, this assessment has been conducted with the following assumptions:

- Accessibility compliance and access to programs and services will be limited to getting into the building, obtaining services from the dispatch center, chief or sergeant/officer on duty, public bathroom and detention facility.
- The remaining departmental spaces are "non-public" which do not house and programs or activities. Should this change in the future, access to these spaces may be required invoking full compliance. Furthermore, a request for a reasonable accommodation may also trigger additional modifications and structural changes.

Overall, the physical condition of the department is somewhat outdated. Although space seems to be adequate, major renovation and rehabilitation of the police department facilities would appear to be long overdue. As part of this effort, both the mandated accessibility modifications as well as the "as needed" modifications could be undertaken.

Description of Programs: Administrative functions of police department, issuing of permits, departmental meetings and training, temporary holding cells.

Accessibility Compliance Options: Initiate improvements and remove architectural barriers as specified.

Estimated Total Project Cost: \$54,950

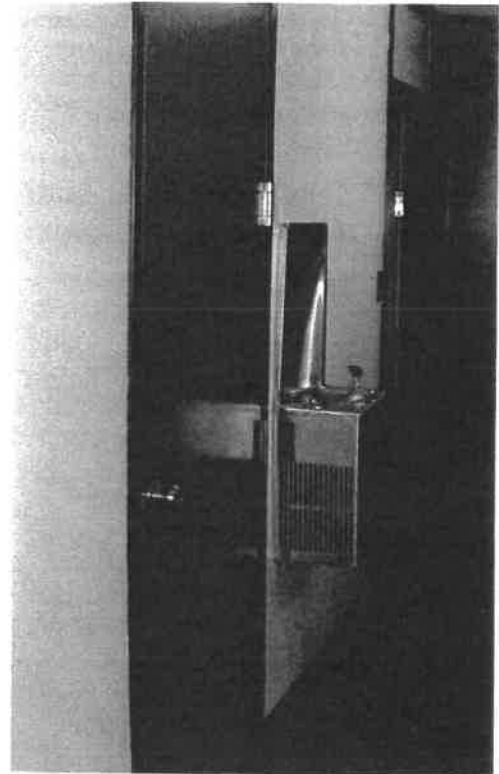
Projected Completion Date: June 2009

<u>General Description of Obstacle Which Limits Mobility or Access</u>	<u>ADAAG Compliance</u>	<u>MA 521 CMR Compliance</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>Cost Estimate</u>
1. No designated accessible parking space, line striping or signage.	S. 4.6	S. 23	Designate one 8' wide (minimum) parking space w/ 8' wide van accessible access aisle. Provide related striping and accessible signage.	1	2	\$200
2. The accessible route is compromised at the curb ramp due to a roughly 3 1/4" "gap" and 1 1/4" change in level between the asphalt parking lot and the concrete ramp.	S. 4.3 S. 4.7	S. 20	Patch with bituminous concrete to eliminate gap, creating a smooth transition and level surface.	1	2	\$100

Millbury Accessibility Plan

Police Station continued

3.	<i>The counter height at the dispatch window is constructed at 42" a.f.f., which exceeds maximum height requirements by 8".</i>	S. 4.32	S. 7	<i>Construct a counter below the dispatch window with a maximum height of 34" with a minimum of 27" knee clearance.</i>	2	3	\$400
4.	<i>Interior door hardware to roughly 16 doors are knob-style and non-compliant. Hardware should be easily operable by one hand or a "closed fist".</i>	S. 4.13	S. 26	<i>Replace door hardware with lever-type hardware or other accessible compliant hardware.</i>	2	2	\$1,600
5.	<i>Drinking fountain outside public toilet room protrudes more than 4" into the hallway. Existing fountain does not provide sufficient minimum 27" knee clearance. No companion "high" drinking fountain provided.</i>	S. 4.15	S. 36	<i>Install new high/low accessible compliant drinking fountain with maximum spout height of 36" a.f.f. for low and 43" a.f.f. for high fountain. Construct wing or flange wall on side(s) of drinking fountain to minimize protrusion to a maximum of 4".</i>	4	3	\$4,150
6.	<i>Public bathroom by entry is wholly non-compliant including door hardware, signage, dispensers and all toilet fixtures.</i>	S. 4.13 S. 4.16 S. 4.19 S. 4.26 S. 4.27 S. 4.30	S. 30 S. 41	<i>Construct a fully compliant single-user accessible toilet room.</i>	3	4	\$13,500
7.	<i>The existing men's and women's holding cells do not meet detention facility standards for accessibility. The minimum 24" door opening is barely achieved; only 32" maneuvering space provided on side of bed (36" min. required); inmate toilets are too low and too close to wall; drinking fountain inaccessible due to location, lack of adequate clear space and approach, inadequate control mechanisms, and lack of knee clearance.</i>		S. 15	<i>Provide at least one fully compliant detention cell. Due to the costs and improbability of modifying the existing cells, a modular cell could be erected in an adjoining area within the station, provided it is on an accessible route of travel.</i>	4	4	\$35,000



Public Buildings: Fire Headquarters

Name: Fire Headquarters

Location: Elm Street

Function: Fire station, fire department administrative office. **Responsible Party:** Fire Department

General Description or Obstacle Which Limits Mobility or Access: The fire station does not meet current accessibility requirements. There exists no designated handicapped accessible parking spaces for station visitors. The front entrance is not accessible due to a 4 1/2" step and non-compliant door (hardware). Once immediately inside the building is a small foyer area inclusive of a stairway to the second floor and a doorway (non-compliant hardware) which enters directly into the truck bay area. Access to either the administrative office or the captain's office is through the truck bay. The second floor, which houses the firefighter quarters and training areas is not accessible and is not open to the general public. No bathrooms for general public use exist, including on the first floor level. All bathrooms are for fire fighting personnel and are not handicapped accessible. Current "unofficial" practice is to open a garage door to one of the truck bays and allow access into the garage area to meet with mobility limiting individuals if required.

With relatively modest modifications, direct entry into the fire station can be achieved which will allow access to fire department services and administrative staff. Improvements to accomplish this would include construction of an accessible ramp, door and entry modifications, interior office door hardware changes, interior signage and proper floor markings to designate the access aisle. Reasonable accommodations for employees could be required in the future, if necessitated, to address the employee bathroom. With these modifications as well as policy changes which stipulate public meetings to occur in the town hall or another fully accessible location, program accessibility can be achieved.

Description of Programs: Administrative functions of fire department, issuing of permits, departmental meetings, training.

Accessibility Compliance Options: Initiate improvements and remove architectural barriers as specified.

Estimated Total Project Cost: \$2,575

Projected Completion Date: June 2008

<u>General Description of Obstacle Which Limits Mobility or Access</u>	<u>ADAAG Compliance</u>	<u>MA 521 CMR Compliance</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>Cost Estimate</u>
1. No designated accessible parking space, line striping or signage.	S. 4.6	S. 23	Designate one 8' wide (minimum) parking space w/ 8' wide van accessible access aisle. Provide related striping and accessible signage.	1	2	\$75
2. Lack of access into building.	S. 4.3 S. 4.8 S. 4.13 S. 4.14	S. 20 S. 22 S. 24 S. 25 S. 26	Modify main front entrance into building and perform required modifications for accessible compliant ramp and entry. This should include the construction of a ramp w/4' of clear space between handrails. The handrails shall be continuous on both sides of the ramp, 1-1/4" to 1-1/2" in outside diameter, and round or oval in shape; handrails to be provided in pairs, one at a height of 34" - 38" above the ramp surface and the lower handrail at a height between 18" and 20"; handrails to be 1-1/2" from the mounted surface; handrails should extend 12" beyond the bottom of the ramp. The ramp shall not exceed a running slope of 8.3% nor a 2.0% cross-slope. A 60" x 60" level area at the ramp base and top is required. The "knob-style" hardware on the door entry must be changed to a compliant type of door hardware. <i>Note:</i> It may be possible to construct a 1:50 (5%) maximum slope) paved walkway thereby eliminating the necessity for handrails.	1	3	\$1,925

Millbury Accessibility Plan

Fire Headquarters continued

3.	<i>Non-compliant interior door hardware. Hardware should be easily operable by one hand or a "closed fist".</i>	S. 4.13	S. 26	<i>Replace existing non-compliant knob-style hardware on 3 interior doors to accessible compliant hardware.</i>	2	2	\$375
4.	<i>Lack of a designated accessible route of travel to fire department offices.</i>	S. 4.3	S. 20	<i>Maintain a designated 36" minimum clear width space accessible route of travel from the main entrance to interior departmental offices. Access route to be noted with painted floor markings.</i>	2	2	\$150
5.	<i>Lack of interior accessible signage to the fire department offices.</i>	S. 4.30	S. 41	<i>Install accessible compliant signage with appropriate finish and contrast and character height and proportions. Raised and Brailled characters should also be included. Signage should be mounted at 60" a.f.f. o.c. adjacent to the latch side of the door.</i>	2	1	\$50



Public Buildings: Public Library

Name: Millbury Public Library

Location: Elm Street

Function: Municipal library

Responsible Party: Library Trustees

General Description or Obstacle Which Limits Mobility or Access: The Millbury Public Library has recently been substantially renovated and expanded. The building as a whole is accessible to those with disabilities, however, there are a number of areas of non-compliance which should be addressed. The accessible parking striping and signage needs to be modified. In addition, signage at the Elm Street entrance needs to be erected directing those with disabilities to the main entrance. There are some interior horizontal and vertical protrusions into the accessible route of travel that need to be addressed. Most of the doors need closer adjustments to comply with closing speed and push/pull force requirements. The men's bathroom urinal is wholly non-compliant. Both men's and women's bathrooms require minor adjustments to some dispenser and fixture height and set back levels. The patron work and reading tables on both the first and second floors do not provide the required 27" knee clearance space.

Description of Programs: Public library, reading and children's programs, story hours, computer access.

Accessibility Compliance Options: Initiate improvements and remove architectural barriers as specified.

Estimated Total Project Cost: \$3,075 - \$8,075

Projected Completion Date: December 2008

<u>General Description of Obstacle Which Limits Mobility or Access</u>	<u>ADAAG Compliance</u>	<u>MA 521 CMR Compliance</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>Cost Estimate</u>
1. <i>Non-compliant accessible parking space, line striping and signage. Current parking spaces are slightly below minimum width requirements. No van accessible space provided.</i>	S. 4.6	S. 23	<i>Designate one 8' wide passenger vehicle parking space and one 8' wide van accessible parking space, separated by a 8' wide accessible access aisle. Re-stripe handicapped spaces to comply and provide van accessible signage.</i>	1	2	\$75
2. <i>No signage at the Elm Street entrance which clearly indicate the location of the accessible main entrance.</i>	S. 4.14	S. 25	<i>Install accessible compliant information and directional signage at Elm Street non-accessible entrance. (Note: Technically, the use of this as an access into the library should be restricted).</i>	1	2	\$100
3. <i>Non-compliant main entry door closing speeds. The exterior main entry doors have closing speeds of 4 and 6 seconds and the second set of interior main entry doors have closing speeds of 4 and 5 seconds.</i>	S. 4.13	S. 26	<i>All door closers require adjusting to comply with the minimum 6 second closing speed requirement.</i>	1	2	\$100
4. <i>No barrier or detection device for the visually impaired exists for the area below the staircase which does not meet the required minimum 80" of headroom.</i>	S. 4.4	S. 20	<i>Provide a barrier or warning device for the vertical clearance under the staircase which is reduced to less than 80" to warn blind or visually-impaired persons.</i>	2	3	\$350
5. <i>Drinking fountain in hallway protrudes more than 4" into the hallway.</i>	S. 4.15	S. 36	<i>Construct wing or flange wall on side(s) of drinking fountain to minimize protrusion to a maximum of 4".</i>	4	3	\$500
6. <i>The tables used for the 2 card catalogue computers provide only 24" of knee clearance space.</i>	S. 4.32	S.35	<i>Modify existing table to comply with required 27" knee clearance requirement.</i>	4	3	\$150

Millbury Accessibility Plan

Public Library continued

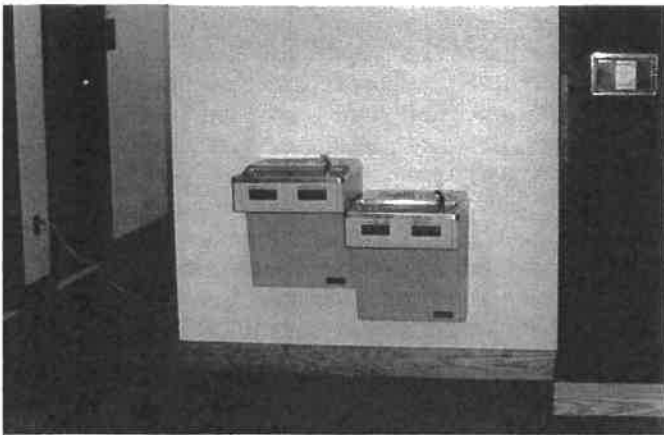
7.	First floor large meeting room - lack of accessible signage.	S. 4.30	S. 41	Install accessible compliant signage with appropriate finish and contrast and character height and proportions. Raised and Brailled characters should also be included. Signage should be mounted at 60" a.f.f. o.c. adjacent to the latch side of the door(s).	2	1	\$50
8.	First floor large meeting room - non-compliant closing speeds and push/pull force on both doors into the room. The closing speeds of are 4 and 5 seconds with the push/pull force at 7 and 12 lbs.	S. 4.13	S. 26	Adjust the door closers such the 6 second minimum closing speed and the maximum 5 lbs. push/pull force is achieved.	2	2	\$100
9.	First floor large meeting room - all meeting tables provide only 26 1/2" of knee clearance space.	S. 4.32	S. 35	Modify 1 or 2 existing tables to comply with required 27" knee clearance requirement.	4	3	\$150



10.	First floor large meeting room - small kitchen area in hallway area has wall cabinets with a bottom height of 54".	S. 4.2	S. 32	Lower wall cabinets such that the bottom height does not exceed 48" a.f.f. with hardware mounted at the bottom of the cabinet door.	4	3	\$250
11.	First floor large meeting room - non-compliant 3 second closing speed of egress door to outside of building.	S. 4.13	S. 26	Adjust the door closers such the 6 second minimum closing speed is achieved.	2	2	\$50
12.	Elm Street entrance/egress - both sets of doorway doors have closing speeds of 2 to 5 seconds; no accessible route of travel to Elm Street; stair handrails do not extend required 12" beyond base of stairs.	S. 4.13 S. 4.3 S. 4.9	S. 20 S. 27	Adjust the door closers such the 6 second minimum closing speed is achieved. Signage to be provided as described in #2 above or public use to be discontinued for emergency use only. Provide extensions on handrails to comply with 12" requirement.	2	3	\$450
13.	Men's bathroom has a number of areas of non-compliance. This includes an 11 lb. push/pull force for the door; urinal rim height of 21" a.f.f. which exceeds maximum height by 4"; flush valve on urinal at 48" a.f.f. which is 4" higher than allowed; insufficient clear floor space exists in front of the urinal due to the side shield projecting beyond the rim and restricting clear floor space to 26 1/2" which exceeds maximum threshold by 3 1/2".	S. 4.13 S. 4.18	S. 26 S. 30	Adjust the door closers such the 5 lbs. maximum push/pull force is achieved. Lower urinal or replace such that height requirements are met. Due to the adjoining water closet stall, attaining compliant clear width space in front of the urinal is difficult without compromising other requirement. Options include removal of the urinal in its entirety, removal of all the shields including those creating the water closet stall and redesigning the door entry for privacy purposes.	3	3	\$200 - \$5,000

Public Library continued

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| 14. Women's bathroom – door has a push/pull force of 8-9 lbs.; water faucet is self-closing and shuts off at 4 seconds which is 6 seconds too fast. | S. 4.13 | S. 26
S. 30 | Adjust door closer to comply with maximum 5 lbs. interior door push/pull force requirement. Adjust self-closing faucet and water shut-off such that water shuts off no sooner than 10 seconds.. | 3 | 3 | \$100 |
| 15. Mirror in children's bathroom is mounted 35 ½" a.ff. at the mirror bottom which exceeds the maximum height by 3 ½". | S. 4.23 | S. 30 | Lower mirror by 3 ½" minimum such that the mirror bottom does not exceed 31" a.ff.. | 3 | 2 | \$50 |
| 16. Second floor tables and work spaces including those in the Brady Reading have knee clearance space of between 24" and 26", which is less than the required 27". | S. 4.3.2 | S.35 | Modify 1-2 tables in the main area and tin the Brady Reading Room to comply with required 27" knee clearance requirement. | 4 | 3 | \$400 |



Public Buildings: Asa Waters Mansion

Name: Asa Waters Mansion

Location: Elm Street

Function: Social, cultural and educational events. **Responsible Party:** Asa Waters Mansion Task Force

General Description or Obstacle Which Limits Mobility or Access: The primary use of the building and grounds is for social and cultural activities as well as for meetings. Most of this occurs on the first floor of the mansion and the outside grounds. Only limited use is made of the remaining 3 floors of the building, with the third and fourth levels not open to the public. The second floor does house some displays on loan as well as the collection of the Millbury Historical Society, which is located in a secure room. If the second floor area is open by appointment only and the remaining upper floors remain closed to the public, the assessment will be subject to the following assumptions:

- Accessibility compliance and to programs and services will be maintained on the property grounds and the first floor of the mansion.
- The third and fourth floor will remain as “non-public” spaces which will not house and programs or activities. Should this change in the future, access to these levels and full compliance may be required.
- The second level of the mansion will continue to house the Millbury Historical Society collection as well as display in other rooms, items that have been loaned or donated to the town and the Asa Waters Mansion. In order to achieve access to the services provided on the second floor without compromising the integrity of the mansion, the items on display as well as the Historical Society Collection must be made available for viewing by all. This can be accomplished by creating a printed descriptive catalogue with photographs of these items on the second floor level as well as a CD which both depicts and describes the same. One of the rooms on the first floor level can be modified to accommodate a viewing area of the catalogue as well as a place (with proper equipment) to watch the CD. Upon request, an individual with a mobility limiting disability who wants to see an item directly, can have that item retrieved from the collection and brought to the designated first floor viewing area. A formal posting of the policy and practice must be posted on the first floor of the mansion, on all Asa Waters literature and pamphlets, as well as on the town’s website.

Based on the aforementioned, the grounds and first floor level can be brought into substantive compliance with modest modifications. **However, if the second floor and/or upper floors are open to the public on a regular or published basis, then full accessibility will be required resulting in the necessity to construct an elevator. It should also be noted that “piecemeal” rehabilitation of the building over a period of time may also trigger full compliance based on the cost and type of improvements.**


There are a number of exterior modifications which are required including parking and access into and around the bandstand. The bandstand was apparently completed in 1994 and is used for summertime concerts, social activities, and weddings. Currently there exist two designated car accessible parking spaces. Neither of these spaces are in compliance with the minimum width requirements for standard spaces and accompanying access aisle nor is a van accessible space provided. Due to the available space it is recommended that one van accessible space and one car accessible space be provided. The main entrance does not provide the proper signage noting the location of the accessible entrance at the side of the building. The ramp leading to the accessible entrance meets all width and slope requirements. Technically, the handrails appear to minimally comply with exception being the continuous rail requirement and the required 12” extension beyond the bottom of the ramp. It is strongly advisable to replace the existing handrail system and support structures in its entirety with a fully compliant, durable and more aesthetically pleasing handrail system. The accessible door swings into the building and violates the Massachusetts Building Code for public buildings. The swing of this door must be reversed to insure the safety of building occupants. The accessible route of travel including clear width space and floor surfaces are compromised throughout the first floor. In most cases full compliance can readily be achieved. Both the men’s and women’s bathroom are substantially non-compliant and modification is required. As a note, at least one set of grab bars are not properly secured with blocking and therefore cannot support the weight of an individual as intended.

Description of Programs: The Asa Waters Mansion is a town-owned 4-level historic mansion which is listed on the State and National Register of Historic Places. The first floor of the mansion serves as a location for lectures, meetings, receptions and other social activities. The second floor of the building sees limited use but also houses the collection of the Millbury Historical Society. The third and fourth levels of the building are not generally open to the public.

Accessibility Compliance Options: Initiate improvements and remove architectural barriers as specified.

Estimated Total Project Cost: \$ 27,975 - \$227,975

Projected Completion Date: September 2009

<u>General Description of Obstacle Which Limits Mobility or Access</u>	<u>ADAAG Compliance</u>	<u>MA 521 CMR Compliance</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>Cost Estimate</u>
1. <i>Non-compliant accessible parking space, line striping and signage.</i>	S. 4.6	S. 23	<i>Designate at least one 8' wide van accessible parking space and a 8' wide accessible access aisle. Provide related striping and accessible signage.</i>	1	2	\$75
2. <i>Inaccessible main entrance does not provide signage noting route to accessible entrance.</i>	S. 4.30	S. 41	<i>Provide accessible compliant directional signage which to indicate the route of travel to the nearest accessible entrance.</i>	1	2	\$75
3. <i>The bandstand is wholly noncompliant as there exists no accessible route of travel to the structure and only a set of steps to get inside.</i>	S. 4.3 S. 4.8	S.20 S. 22 S. 24	<i>Construct a 48" wide w/36" clear width accessible pathway to provide access to the bandstand. Construct a ramp into the bandstand which meets all accessibility requirements. This should include the construction of a ramp which does not exceed a running slope of 8.3% nor a 2.0% cross-slope. A 60" x 60" level area at the ramp base and top is required. Four feet of clear space is required between handrails. The handrails shall be continuous on both sides of the ramp, 1-1/4" to 1-1/2" in outside diameter, and round or oval in shape; handrails to be provided in pairs, one at a height of 34" - 38" above the ramp surface and the lower handrail at a height between 18" and 20"; handrails to be 1-1/2" from the mounted surface; handrails should extend 12" beyond the bottom of the ramp.</i>	1	3	\$12,500
						
4. <i>The existing handrails on the ramp into the mansion do not fully comply with the continuous rail requirement and the minimum 12" handrail extension beyond the bottom of the ramp.</i>	S. 4.8	S. 24	<i>As noted above, replace the existing handrail and support structures with a fully compliant, durable and more aesthetically pleasing handrail system.</i>	1	3	\$4,500
5. <i>The threshold between the work room adjacent to the accessible entrance and the balance of the mansion's first floor level is separated by a 1" threshold which exceeds the allowable vertical floor surface tolerance of 1/2".</i>	S. 4.5	S. 29	<i>Replace existing threshold with a beveled threshold of not more than 1/2" in height and a 1:2 slope.</i>	2	3	\$250
6. <i>Interior door hardware to 3 administrative offices and work area are knob-style and non-compliant. Hardware should be easily operable by one hand or a "closed fist".</i>	S. 4.13	S. 26	<i>Replace door hardware with lever-type hardware or other accessible compliant hardware.</i>	2	2	\$375
7. <i>Inadequate clear width space within the accessible route of travel in administrative offices, work area and hallway accessing bathrooms. The latter restricted to only 24" due to the presence of a "portable" coat rack.</i>	S. 4.3	S.20	<i>Rearrange and/or remove all items which reduce the clear width space to less than 36" within the interior accessible route of travel.</i>	2	1	\$0

Millbury Accessibility Plan

Asa Waters Mansion continued

8.	The portable coat rack is 58" a.f.f. o.c. which exceeds the maximum 54" a.f.f. for a side approach.	S. 4.2	S. 34	Purchase or install a coat rack with a maximum height of 54" a.f.f.	4	2	\$100
9.	Non-compliant interior carpets and runners.	S. 4.5	S. 29	The accessible route of travel contains floor carpets and runners which detract from providing a stable, firm, slip resistant surface. These materials should be removed from these affected areas whenever possible.	2	1	\$0
10.	Five interior thresholds have a height of 3/4" which exceeds the allowable vertical floor surface tolerance of 1/2".	S. 4.5	S. 29	Modify and/or replace existing thresholds with beveled thresholds of not more than 1/2" in height and a 1:2 slope.	2	3	\$1,250
11.	Men's bathroom - lack of accessible signage on latch side of door; non-compliant knob-style door hardware; hand-held soap dispenser; mirror mounted 48" at bottom a.f.f.; water closet exceeds the nearest sidewall setback requirement by 5"; towel dispenser "hand held" and not mounted; 36" side grab bar is mounted 1 1/2" too far from rear wall and is not properly secured to wall studs or blocking; rear grab bar not properly secured; sink exceeds maximum rim height requirement by 2" and does not provide adequate 27" knee clearance below; no coat hook provided.	S. 4.13 S. 4.16 S. 4.19 S. 4.26 S. 4.27 S. 4.30	S. 30 S. 41	<p>Renovate bathroom by replacing or modifying to comply as follows:</p> <p>Sink - maximum height of 34" to rim, minimum of 22" from wall to front of sink, minimum 27" clear knee space below rim, bowl depth not to exceed 6"; all pipes below sink must be wrapped; faucets must be operable with one hand or a closed fist; self-closing valves shall remain open for at least ten seconds.</p> <p>Dispensers - towel dispensers, drying devices, soap dispensers and similar devices must be operable with one hand or a closed fist at a maximum height of 42" a.f.f.</p> <p>Water closet - the centerline of the toilet shall be 18" from the nearest side wall and at least 42" from the farthest side wall; toilet seat shall be 17" to 19" a.f.f.; flush valve is to be on the approach side of the toilet.</p> <p>Grab bars - two grabs 42" long, one located at the back wall and one located on the side wall; 1-1/4" to 1-1/2" in outside diameter with a clearance of 1-1/2" from the wall; non-rusting or acid-etched or roughened; capable of resisting 250 lbs. of force and secured to wall studs or blocking and set at a height of 33" to 36" a.f.f.</p> <p>Mirror- reinstall mirror such that the bottom of mirror shall be at a maximum height of 40" a.f.f.</p> <p>Door hardware - replace existing door knob-style hardware with lever-type hardware or other accessible compliant hardware.</p> <p>Coat hook - provide a coat hook at a maximum height of 54" a.f.f.</p> <p>Signage - install accessible compliant signage with appropriate finish and contrast and character height and proportions. Raised and Brailled characters should also be included. Signage should be mounted at 60" a.f.f. o.c. adjacent to the latch side of the door.</p>	3	3	\$4,350



Asa Waters Mansion continued

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| 12. Women's bathroom - lack of accessible signage on latch side of door; non-compliant knob-style door hardware; hand-held soap dispenser; mirror mounted 48" at bottom a.f.f.; water closet exceeds the nearest sidewall setback requirement by 4 1/2"; flush valve mounted on the nearest wall side as opposed the approach side; only one 36-inch "smooth surfaced" grab bar provided on the side wall side and does not appear to be properly secured to wall studs or blocking; sink exceeds maximum rim height requirement by 2" and does not provide adequate 27" knee clearance below | S. 4.13
S. 4.16
S. 4.19
S. 4.26
S. 4.27
S. 4.30 | S. 30
S. 41 |
|---|--|----------------|



Renovate bathroom by replacing or modifying to comply as follows: 3 3 \$4,500

Sink - maximum height of 34" to rim, minimum of 22" from wall to front of sink, minimum 27" clear knee space below rim, bowl depth not to exceed 6"; all pipes below sink must be wrapped; faucets must be operable with one hand or a closed fist; self-closing valves shall remain open for at least ten seconds.

Dispensers - towel dispensers, drying devices, soap dispensers and similar devices must be operable with one hand or a closed fist at a maximum height of 42" a.f.f.

Water closet - the centerline of the toilet shall be 18" from the nearest side wall and at least 42" from the farthest side wall; toilet seat shall be 17" to 19" a.f.f.; flush valve is to be on the approach side of the toilet.

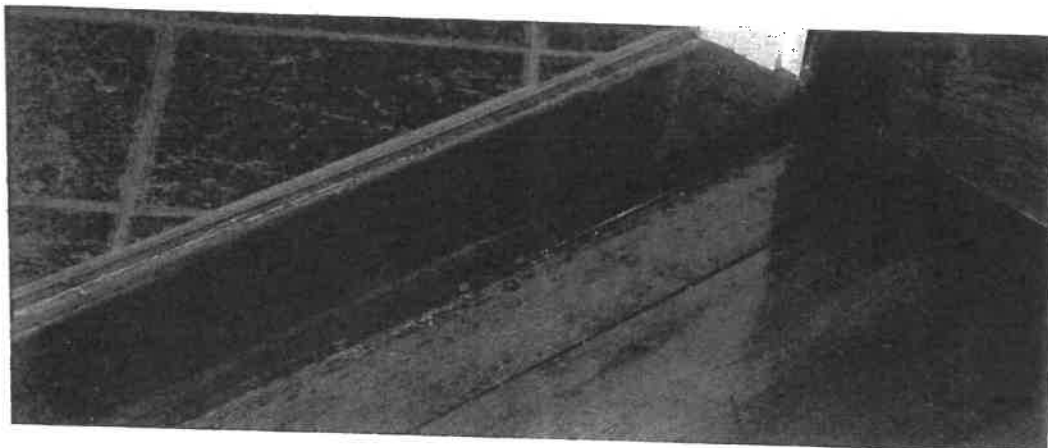
Grab bars - two grabs 42" long, one located at the back wall and one located on the side wall; 1-1/4" to 1-1/2" in outside diameter with a clearance of 1-1/2" from the wall; non-rusting or acid-etched or roughened; capable of resisting 250 lbs. of force and secured to wall studs or blocking and set at a height of 33" to 36" a.f.f.

Mirror- reinstall mirror such that the bottom of mirror shall be at a maximum height of 40" a.f.f.

Door hardware - replace existing door knob-style hardware with lever-type hardware or other accessible compliant hardware.

Signage - install accessible compliant signage with appropriate finish and contrast and character height and proportions. Raised and Brailled characters should also be included. Signage should be mounted at 60" a.f.f. o.c. adjacent to the latch side of the door.

Note: As previously described, if the second and upper floors of the Asa Waters Mansion are open for regular or published public use, then full accessibility, including the construction of an elevator (for all four levels) or LULA for access to levels one and two will be required, as well as other modifications. Due to the historical nature of the building as well as its overall construction, architectural services will be required. Depending on the number of floor stops, internal or external location and related factors, costs will range from \$90,000 to \$200,000.



Public Buildings: Senior Center

Name: Senior Center

Location: River Street

Function: Council on aging office, senior center, drop-in lounge.

Responsible Party: COA

General Description or Obstacle Which Limits Mobility or Access: Overall the senior center is substantially compliant with accessibility requirements. There are a number of exterior modifications which are required including parking and access into and around the gazebo. Currently there exist two designated car accessible parking spaces. Neither of these spaces are in compliance with the minimum width requirements for standard spaces and accompanying access aisle nor is a van accessible space provided. Due to the available space it is recommended that one van accessible space and one car accessible space be provided. Within the building itself some of the required modifications include adjusting the various door closer and hinges due to inadequate push/pull force and closing speeds, the installation of accessible signage designating all permanent rooms and spaces, relocation of some dispensers and grab bars within the bathrooms and the removal of all mats and rugs which negatively impact the accessible route and slop resistant surfaces.

The counter height at the council on aging reception window is constructed at 41¼" above finish floor and therefore exceeds the maximum height requirements. However, an office door opening is adjacent to the window and any person can readily enter the office directly and use interior desk space to receive information or assistance. In addition, a small multi-purpose room located directly opposite the restrooms also contains a non-compliant wash sink and accompanying wall-mounted cabinet. It appears that this sink is for the convenience of medical professionals if and when screenings occur in that room. Reasonable accommodations for those conducting the screenings, etc. could be required in the future, if necessitated.

Description of Programs: Administrative functions of council on aging, health services and screenings, social activities, nutrition programs and intergenerational programs.

Accessibility Compliance Options: Initiate improvements and remove architectural barriers as specified.

Estimated Total Project Cost: \$ 2,875

Projected Completion Date: September 2008

<u>General Description of Obstacle Which Limits Mobility or Access</u>	<u>ADAAG Compliance</u>	<u>MA 521 CMR Compliance</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>Cost Estimate</u>
1. <i>Non-compliant accessible parking space, line striping and signage.</i>	S. 4.6	S. 23	<i>Designate one 8' wide accessible passenger vehicle parking space and one 8' wide van accessible parking space, separated by a 8' wide accessible access aisle. Provide related striping and accessible signage.</i>	1	2	\$75
2. <i>Inadequate clear width space along walkway around gazebo.</i>	S. 4.3	S.20	<i>The River Street side of the gazebo restricts the walkway and accessible route of travel down to 23" of clear width space. Gazebo should be slightly moved to accommodate for additional 13" of required space (36" minimum required).</i>	1	2	\$100
3. <i>Ramp into gazebo exceeds the maximum running slope requirement at 13.3 %. Furthermore, the ramp does not have handrails nor does it provide a 60" level area at the top.</i>	S. 4.3 S. 4.8	S. 24	<i>Construct a new ramp which meets all accessibility requirements. This should include the construction of a ramp which does not exceed a running slope of 8.3% nor a 2.0% cross-slope. A 60" x 60" level area at the ramp base and top is required. Four feet of clear space is required between handrails. The handrails shall be continuous on both sides of the ramp, 1-1/4" to 1-1/2" in outside diameter, and round or oval in shape; handrails to be provided in pairs, one at a height of 34" - 38" above the ramp surface and the lower handrail at a height between 18" and 20"; handrails to be 1-1/2" from the mounted surface; handrails should extend 12" beyond the bottom of the ramp.</i>	1	3	\$1,450



Millbury Accessibility Plan

Senior Center continued

4.	<i>The 3 second closing speed of the screen door into the gazebo exceeds the closing speed requirements.</i>	S. 4.13	S. 26	<i>Install a door closer to comply with the minimum 6 second closing speed requirement.</i>	1	2	\$100
5.	<i>Non-compliant exterior door closing speeds.</i>	S. 4.13	S. 26	<i>The second set of interior main entry doors as well as 6 other egress doors have door closing speeds of 3 to 5 seconds. All door closers require adjusting to comply with the minimum 6 second closing speed requirement.</i>	1	2	\$100
6.	<i>Non-compliant interior door mats and carpets.</i>	S. 4.5	S. 29	<i>The front entry as well and the accessible route of travel contains floor mats and carpets which detract from providing a stable, firm, slip resistant surface. Some of these appear to be seasonal in nature. These materials should be removed from these affected areas.</i>	2	1	\$0
7.	<i>Non-compliant assembly/dining room door closing speed and push/pull force. The closing speeds of these 4 doors range from 4 to 5 seconds with the push/pull force at 7 to 8 lbs.</i>	S. 4.13	S. 26	<i>Adjust the door closers such the 6 second minimum closing speed and the maximum 5 lbs. push/pull force is achieved.</i>	2	2	\$100
8.	<i>Lack of interior accessible signage to the various permanent function room (dining/assembly, medical screening, director, reception, craft, and conference room).</i>	S. 4.30	S. 41	<i>Install accessible compliant signage with appropriate finish and contrast and character height and proportions. Raised and Brailled characters should also be included. Signage should be mounted at 60" a.f.f. o.c. adjacent to the latch side of the door(s).</i>	2	1	\$300
9.	<i>Men's bathroom has a number of areas of non-compliance which are just outside the accepted tolerances but can still be corrected at nominal expense. Most of these focus on exceeding height, setback and door push/pull force standards. This includes a 10 lbs. push/pull force, signage mounted at 62" a.f.f. o.c., soap dispenser at 46" a.f.f. side and rear grab bars at 13" and 7 1/2" from nearest wall respectively, lack of a coat hook on toilet stall door and the location of the toilet flush valve on the wall side of the toilet.</i>	S. 4.13 S. 4.16 S. 4.26 S. 4.27 S. 4.30	S. 26 S. 30 S. 41	<i>Adjust door closer to comply with maximum 5 lbs. interior door push/pull force requirement. Lower signage by 2" so that it is 60" a.f.f. o.c. Lower soap dispenser 4" to 42" a.f.f. Provide a coat hook on the stall door at a maximum height of 54" a.f.f. Remount grab bars such that the rear grab bar is no more than 12" from the nearest side wall and the side grab bar is no more than 6" from the nearest side wall. Replace water closet tank with one which has its flush valve on the approach side of the toilet.</i>	3	2	\$500
10.	<i>Women's bathroom has a number of areas of non-compliance which are just outside the accepted tolerances but can still be corrected at nominal expense. Most of these focus on exceeding height, setback and door push/pull force standards. This includes a 10 lbs. push/pull force, signage mounted at 62 1/2" a.f.f. o.c., side and rear grab bars at 13" and 7 1/2" from nearest wall respectively, lack of a coat hook on toilet stall door and a wall mounted cabinet with its leading edge between 27" and 80" protrudes more than 4" into the accessible route of travel.</i>	S. 4.4 S. 4.13 S. 4.26 S. 4.30	S. 20 S. 26 S. 30 S. 41	<i>Adjust door closer to comply with maximum 5 lbs. interior door push/pull force requirement. Lower signage by 2 1/2" so that it is 60" a.f.f. o.c. Provide a coat hook on the stall door at a maximum height of 54" a.f.f. Remount grab bars such that the rear grab bar is no more than 12" from the nearest side wall and the side grab bar is no more than 6" from the nearest side wall. Either remove cabinet from wall or place a free-standing barrier below the cabinet which is detectable by a cane as long as the barrier or object does not reduce the required clear width space of the accessible route or the maneuvering space.</i>	3	2	\$150

Public Buildings/Leased for Public Accommodations: McGrath Educational Center

Name: McGrath Educational Center

Location: Elm Street

Function: Alternative educational facility/social services.

Responsible Party: Board of Selectmen

General Description or Obstacle Which Limits Mobility or Access: The McGrath Educational Center is a masonry two-story multi-level building which formally housed a public school. It is currently leased by the town to a non-profit organization to provide an alternative educational setting for problem youth as well as to provide community and social services.

Access to building and services: The building is wholly non-compliant and does not meet current accessibility standards. The single handicapped parking space is not van accessible, is within the accessible route of travel to the building, has a cross-slope of 4.3% at the access aisle and lacks signage. The accessible route of travel to the accessible entrance exceeds maximum cross-slope requirements. The ramp leading to the entryway lacks compliant handrails. An interior wheelchair lift at the ground level accessible entrance provides access to the 1st floor only. Access to the remaining ground floor area and second floor level is restricted. Furthermore, the vertical wheelchair lift is wholly non-compliant. First and foremost, the 32" x 48" platform does not meet the minimum 36" x 54" size requirement.

Ground Floor: Access to the ground floor which houses offices, clinical and social service programs, the educational center's gymnasium and bathrooms is wholly restricted. The on-grade entrance is served by a non-compliant door which only opens with great difficulty, has a failed door closer and contains an abrupt 3" vertical change immediately within the door entry, thereby rendering the access non-compliant. The gymnasium area can only be accessed by a series of stairs or via an interior ramped entrance which has a running slope of 35%. Newly renovated bathrooms on this level are inaccessible and wholly non-compliant.

First Floor: The first floor level contains administrative offices, reception office, teacher's lounge, dining hall, library, culinary arts room and one classroom. A wholly non-compliant unisex "accessible" bathroom is also located on this level. With the exception of the teacher's lounge, clear width space into rooms and offices is generally acceptable and meet the minimum 32" clear width space requirement. Accessible signage is missing throughout the first floor, door hardware (knob-style) is non-compliant, stair treads to ground and second floor levels are not slip resistant. Further obstructions and deficiencies exist in the hallway as fire extinguishers extend more than 4" into the accessible route of travel, a floor grate in the center of the hallway has openings of 3/4" which exceeds the maximum threshold of 1/2" and no student lockers are accessible.

Second Floor: The second floor level consists of 4 offices, a classroom, a transition room, and 2 "time-out" rooms. Similar to the first floor, all door hardware is non-compliant, fire extinguishers protrude into the accessible route of travel, and no accessible signage or lockers exist. Furthermore, 3 of the classrooms and 2 of the offices can only be accessed by stairs (2-3 steps). No bathrooms exist on the second floor level.

Summary: The two-story McGrath Educational Center Building has rooms and operations on six different levels due to raised rooms and/or wings on the different floor levels. As a result, simple modification of existing conditions for accessibility compliance is not practical. Architectural design including substantial renovations to achieve full barrier removal is required. The architectural solution chosen will have direct impact on each barrier removal element on the site and in the building. Furthermore, based on the work required to bring the building into compliance with MA 521 CMR and ADAAG, it is highly likely that full code compliance with the Massachusetts State Building Code will also be required due to the substantive construction cost as a percentage of building value. Depending on the desired architectural alternative to address the various compliance issues, the actual construction solutions(s) and related cost may vary. The town must decide whether it is cost feasible to initiate such construction or dispose of the property. An overall summary of the major areas of non-compliance and estimated cost is provided below.

Description of Programs: Alternative education program, social service programs, clinic.

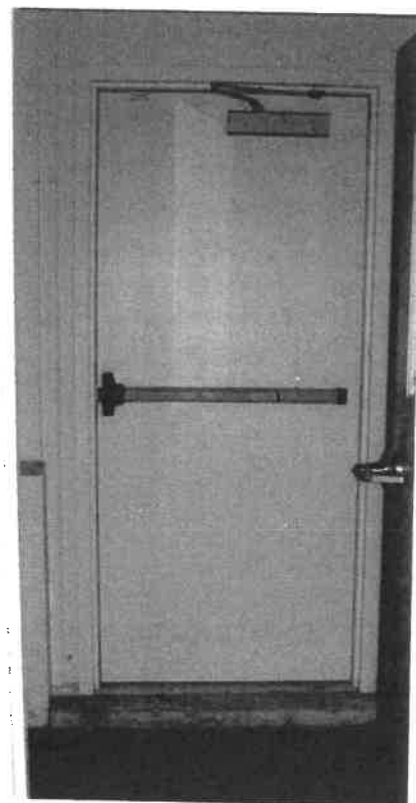
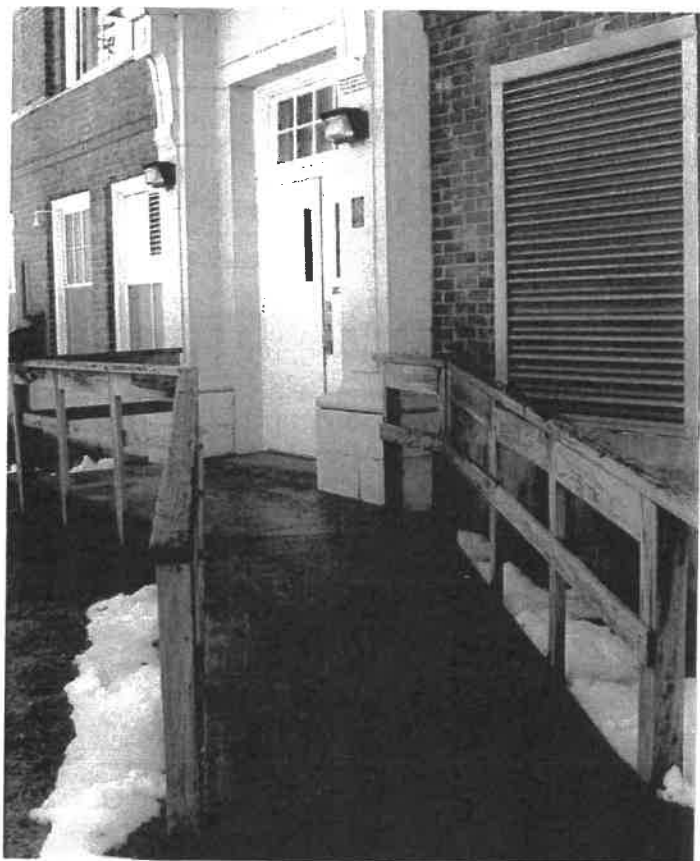
Accessibility Compliance Options: Initiate improvements and remove architectural barriers as required. Again, costs will vary tremendously based upon design solution.

Estimated Total Project Cost: \$ 388,000+

Projected Completion Date: September 2009

Public Buildings/Leased for Public Accommodations: McGrath Educational Center - continued

<u>Obstacle Which Limits Mobility or Access</u>	<u>Cost Estimate</u>
1. Parking and accessible route of travel	\$7,500
2. Elevator and interior ramping	\$250,000
3. Bathrooms	\$30,000
4. Interior door hardware	\$5,000
5. Room signage	\$2,000
6. Lockers	\$2,500
7. Interior room modifications (increase door widths, modify classroom wash sinks, adjust door closers, install stair treads)	\$15,000
Subtotal	\$312,000
Contingency (10%)	\$31,200
Architect design fee	\$45,000
Mandated renovations per MSBC	Unknown
Total	\$388,200+



Public Buildings/Areas: Town Common

Name: Town Common

Location: Elm and Main Streets

Function: Town common.

Responsible Party: DPW

General Description or Obstacle Which Limits Mobility or Access: The town common does not meet current accessibility standards. Six benches are provided with no accompanying "flat" area for a wheelchair. The brick-paved approach to the main sitting area which contains four benches significantly exceeds the maximum running slope standards for both accessible routes and ramps varying from 6.5% to 9.6%. The only location to site a wheelchair in this area has a slope of 5.2%. The bench adjacent to the sidewalk on Main Street does not include an adjacent wheelchair sitting area.

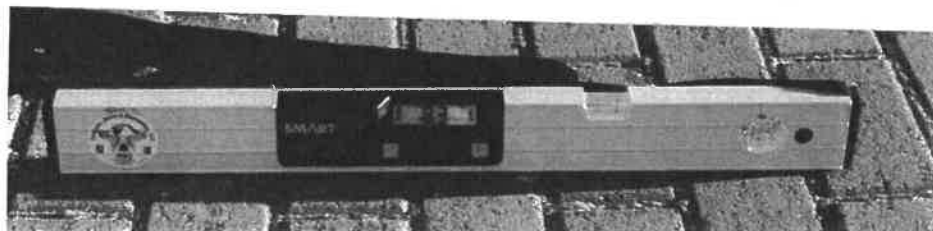
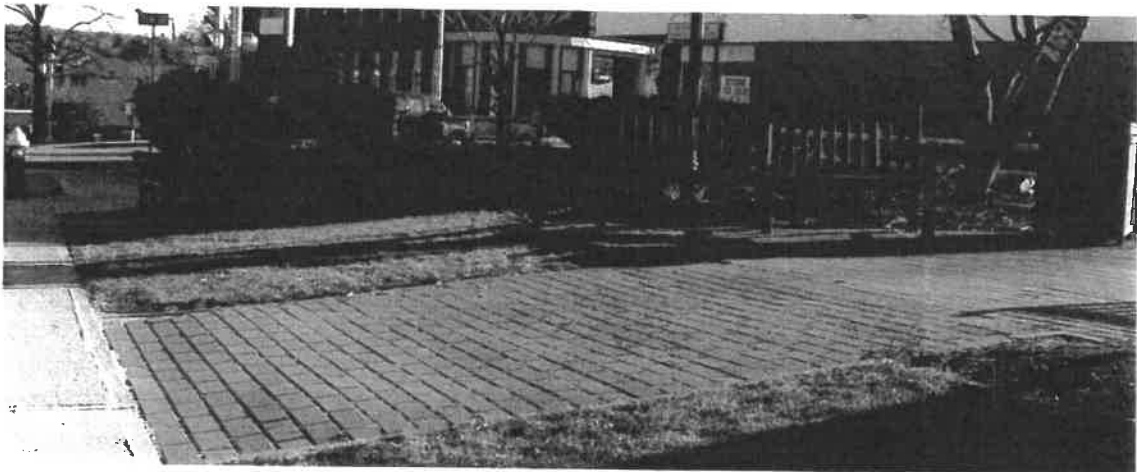
Description of Programs: Varies – public open space.

Accessibility Compliance Options: Initiate improvements and remove architectural barriers as specified.

Estimated Total Project Cost: \$4,500

Projected Completion Date: November 2008

<u>General Description of Obstacle Which Limits Mobility or Access</u>	<u>ADAAG Compliance</u>	<u>MA 521 CMR Compliance</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>Cost Estimate</u>
1. <i>Running slope of walkway exceeds maximum 5% slope requirements for an accessible route of travel..</i>	S. 4.3	S. 20	<i>Reconstruct the existing brick-paved walkway to comply with the maximum 5% running slope threshold..</i>	2	3	\$1,500
2. <i>No level surface for a wheelchair sitting area exists at the location with the four benches.</i>	S. 4.33	S. 19	<i>Create a minimum 36" x 60" hard packed or paved flat space for a wheelchair sitting area by reconstructing the existing brick paved area to create the required level surface.</i>	2	3	\$2,500
3. <i>No hard packed level surface for a wheelchair sitting area exists adjacent to the bench which is parallel to the sidewalk on Main Street.</i>	S. 4.33	S. 19	<i>Adjacent to the bench, expand the existing brick paved area to include an additional 36" x 60" brick-paved area.</i>	2	3	\$500



Public Buildings/Public Ways: Sidewalks and Curb Ramps

Name: Sidewalks and curb ramps.

Location: Central business district.

Description of Facility: Public ways - sidewalks and curb ramps along Elm, Canal and Main Streets.

Function: Pedestrian access within public ways.

Responsible Party: DPW

General Description or Obstacle Which Limits Mobility or Access: A site assessment was conducted of the town's sidewalks and curb ramps in the central business district, specifically Elm, Canal and Main Streets. Although many areas were assessed, a complete and accurate determination of all pedestrian access ways within the Town of Millbury was outside the immediate required scope. Regardless of the documented areas of non-compliance, the town must comply according to the stricter of the ADAAG, 521 CMR, or Massachusetts Highway Department Wheelchair Ramp Standards, whichever is appropriate. In addition, a minimum clear width of 36" on an accessible route of travel must be maintained. This includes a minimum of 80" of clear headroom. Specifically, the conditions of the town's sidewalks and curb ramps of the central business district were assessed. Photographic documentation is provided which demonstrates both common problems and serious concerns.

Visual Assessment

The field assessment categorized the areas of non-compliance into seven categories as follows:

1. No curb ramp.
2. Non-compliant curb ramp (too steep, too narrow, inadequate landing area, uneven transition, etc.).
3. Insufficient clear width (sidewalk too narrow, telephone pole obstruction, fire hydrant obstruction, etc.).
4. Insufficient head room (telephone guide wire obstruction).
5. Lack of detectable warnings at crosswalks which are hazardous vehicle areas.
6. Non-compliant crosswalks (not perpendicular to street, etc.).
7. Other non-compliant conditions or concerns (excessive sidewalk running or cross slopes, unstable sidewalk surfaces, etc.).

Required Standards

The non-compliant areas as described and all others that currently exist but not specifically identified, must adhere as reasonably feasible as possible, to the following, in accordance with Sections 4.3 and 4.7 of the ADAAG and Sections 20, 21 and 22 of 521 CMR.

Standard

- Whenever sidewalks, walkways, or curbs on streets and ways are constructed, reconstructed, or repaired, curb cuts are required.
- Curb cuts shall occur whenever an accessible route crosses a curb.
- Curb cuts are required at each corner of an intersection and shall be perpendicular to the street. Single curb cuts serving two street crossings are generally not allowed.
- The maximum slope of a curb ramp shall be 1:12 (8.3%).
- The maximum cross slope of a curb ramp shall be 1:50 (2%).
- Transitions from curb cuts to walks, gutters, or streets shall be flush or free of changes in level greater than 1/2".
- The minimum width of a curb cut shall be 36", exclusive of flared sides.
- The maximum slope of a flared side shall be 10%.
- A minimum 48" level landing must be provided at top and bottom of curb ramp.
- Detectable warnings should be at those crosswalks which are considered hazardous vehicle areas.
- Clear width (36") and head room (80") requirements must be maintained on sidewalks and accessible routes.
- Width of walkways shall not be less than 48" with a minimum 36" clear width.

- Running slopes of walkways should not exceed 5% (wherever practicably feasible for sidewalks) and cross slopes should not exceed 2%.
- Walkway surfaces shall be stable and firm and shall lie generally in a continuous plane with a minimum of surface warping.
- Walkways should have a continuous common surface not interrupted by steps or changes in level greater than ¼".
- All sidewalks/accessible routes of travel must be maintained and kept in a good quality condition including being kept free of snow and ice or other debris which would restrict access.

Summary of Conditions

The majority of the curb ramps and many of the sidewalks in the central business district do not comply with state and federal accessibility requirements. On the whole, this area is considered to be minimally accessible due to non-compliant curb ramps (steep slopes, inadequate level landing area), lack of a curb ramp, non-compliant crosswalk (not perpendicular to street, lack of markings), reduced accessible route of travel, excessive cross slopes, uneven and deteriorated surfaces and similar deficiencies. The majority of curb ramps are designed to serve two cross walks and therefore are not perpendicular to the street. As a result, the curb ramp directs a visually impaired person into the street and directly into traffic and not within the crosswalk to the curb ramp on the immediate opposite side.

Although there are limited conditions where this may be allowed, it appears that none of these are met on the curb ramps and cross walks assessed in Millbury's central business district. Most of these same areas also had excessive ramp slopes and inadequate level landings for wheelchair maneuverability. Most of the curb ramps and sidewalks are older with only a few segments evident of more recent installation or replacement. In a few instances, telephone guide wires protruded into the clear width of the accessible pathway, restricting travel and causing potential harm to the visually impaired. Although accessible pedestrian signals have been installed at the intersection of Main and Elm Streets, it would also be advisable to install detectable warning strips at all curb ramps at this intersection due to its high traffic (pedestrian, vehicular) volume. Only one or two on-street handicapped parking spaces were noted. The municipal parking lot off Elm Street "appeared" to provide the minimum number of required handicapped spaces (3 of 75), however, none were designated to be van accessible. Furthermore, a clearly defined accessible route of travel to Elm Street is not provided.

The following specific areas of non-compliance have been identified areas in the central business district service area. Numbers in parenthesis correspond to the photographs at the end of this assessment. All of these concerns should be addressed through reconstruction.

Main Street

- Rail trail parking lot – no accessible signage, access aisle.
- Curb ramp at Main Street and Route 146 not perpendicular to the sidewalk.
- Bituminous concrete sidewalk in vicinity of 189 – 193 Main Street varies from 2.0% to 6.6%.
- Clear width space reduced to 6" to 8" at 187 Main Street due to the location of a catch basin in the route of travel.
- Clear width space reduced to 29" at 181 Main Street due to the location of a catch basin in the route of travel. [1]
- Newly constructed bituminous concrete sidewalk in vicinity of 175 Main Street has a running slope of 15.2% - could easily have been constructed to full compliance. [2]
- Newly constructed bituminous concrete sidewalk in vicinity of 161 Main Street has a running slope of 13.1% - could easily have been constructed to full compliance.
- Clear width space reduced to 0" at 151 Main Street due to the location of a catch basin in the route of travel. [3]
- Telephone pole restricts clear width space to approximately 32" at 151 Main Street.
- Crosswalk at 135 Main Streets uses a private driveway as a "curb ramp".

- Concrete sidewalk in vicinity of 135 Main Street has a $> \frac{1}{2}$ " change in surface.
- Telephone guide wire at 99 Main Street protrudes slightly into route of travel reducing the required 80" clear head room requirements.
- Curb ramp at 97 Main Street with no accompanying crosswalk.
- Concrete sidewalk in vicinity of 75 Main Street severely deteriorated causing an uneven and unstable surface.
- Curb ramp at Main and Hamilton Streets is too steep (23% slope) and has an insufficient top level landing. Crosswalk markings are faded and should be repainted.
- Curb ramp(s) at West and Main Streets (Roland J. Morrisette Square) are too steep (11.1%, 20.7% slopes), has an insufficient top level landing on one side and lack crosswalk markings.
- Replacement concrete pad at 49 Main Street is severely deteriorated, has a $\frac{3}{4}$ " to 1" change in level surface and is not stable.
- Transition from concrete sidewalk to bituminous concrete paved driveway(s) of Mulhane Funeral Home (#45 Main Street) has a 2" abrupt change in level surface.
- Curb ramp at Main and Summer Streets is too steep (12.5% slope) and has an insufficient top level landing. Crosswalk markings are faded and should be repainted.
- Curb ramp at Main and Canal Streets lack a smooth transition at the ramp base with a 1" abrupt change in level surface. Crosswalk markings severely faded and need repainting. One curb ramp (bank side) serves two crosswalks and is not perpendicular to the sidewalk. Detectable warning strips and accessible pedestrian signals should be installed at this location.
- Curb ramp(s) at Grant and Main Streets are too steep (18.0%, 12.6% slopes) and have insufficient top level landings. Crosswalk markings are faded and should be repainted.
- Crosswalk at Farnsworth Court lacks a curb ramp on one side (2" to 4" granite curb) and does not provide a smooth transition on the opposite side. [4]
- Obstructions occur within the accessible route of travel in front of the town common due to a telephone guide wire reducing the 80" clear head room requirement and the presence of a fire hydrant in the middle of the sidewalk.
- "Major" intersection at Elm and Main Streets: lack of detectable warning strips, crosswalk markings severely faded and need repainting, excessive curb ramp slopes (12.2%, 11.0%), insufficient top level landings, curb ramps not perpendicular to the sidewalk, curb ramps serve two crosswalks. [5]
- Sidewalk at OTB News reduced to 31" of clear width space due to building location and signalization pole, brick pavers create uneven surface.
- Brick pavers along businesses to Canal Street are uneven and unstable, transition from bituminous concrete to brick resulting in a $\frac{1}{2}$ " to 1" abrupt change in level surface.
- Curb ramp(s) at Church and Main Streets are too steep (11.5%, 15.5%), has an insufficient top level landing on one side and lacks crosswalk markings.
- Faint crosswalk markings exist in front of Scannel's Package Store to Brooks on opposite side of the street, but no curb ramps exist.
- Accessible route of travel is eliminated along the sidewalk at the driveway between Scannel's Package Store and screen printing business due to a 5" granite curb and abrupt change in level surface. [6]
- Curb ramp(s) at Miles and Main Streets are too steep (11.6%, 16.5%), have insufficient top level landings and crosswalk needs to be repainted.
- Curb ramp(s) at Hamilton and Main Streets are too steep (11.8%, 19.7%), are not perpendicular to the sidewalk, have insufficient top level landings and crosswalk needs to be repainted.
- Curb ramp(s) at Highland and Main Streets are too steep (13.9%, 14.8%), are not perpendicular to the sidewalk, have insufficient top level landings and crosswalk needs to be repainted.

- Curb ramp(s) at Orchard and Main Streets are too steep (17.2%, 17.8%), are not perpendicular to the sidewalk, have insufficient top level landings and crosswalk needs to be repainted.
- Curb ramp(s) at Goff and Main Streets are too steep (12.8%, 18.1%), are not perpendicular to the sidewalk, have insufficient top level landings, crosswalk needs to be repainted, significant “ponding” of water occurs at the base of the southerly curb ramp. [7]
- No curb ramp exists to cross Martin Street from the Main Street sidewalk. Faint crosswalk markings exist. [8]
- Abrupt change in level surface at 146 Main Street as well as excessive cross-slopes.
- Sidewalk (accessible route of travel) ends at 156 Main Street, curb ramp and crosswalk required across Main Street to opposite side of street to continue accessible route of travel.

Elm Street

- Curb ramp at Elm Court is too steep (10.6%), crosswalk needs to be repainted, a 6” granite curb at the opposite side of the crosswalk (no curb ramp) eliminates the accessible route of travel. [9]
- Concrete pads on both sides of the bridge over the railroad on Elm Street have > 1” abrupt changes in level surface.
- Curb ramp(s) at River and Elm Streets are too steep (17.6%), are not perpendicular to the sidewalk, have insufficient top level landings, serve two crosswalks; one crosswalk enters into a driveway; one sidewalk lacks a curb ramp to the crosswalk; crosswalk needs to be repainted. [10]
- Curb ramp(s) at Waters and Elm Streets are too steep (17.8%, 17.1%), are not perpendicular to the sidewalk, have an insufficient top level landing at the library side, crosswalk needs to be repainted.
- Driveway apron and sidewalk in vicinity of 118 Elm Street has an abrupt change in level surface and is deteriorated and in need of repair.
- Access to and from municipal parking lot (Harris Place) is restricted due to the placement of planters on the accessible route of travel thereby restricting the clear width to less than 30”; accessible route by pharmacy (Elm Street) has a slope of 15.2%. [11]
- Sidewalk cross-slope in front of pharmacy varies from 6.4% to 8.8%.
- No curb ramp (5” to 6” abrupt change in level surface) exists at Harris Place sidewalk crossing, no crosswalk markings.
- Excessive cross-slopes (8.3% to 12.1%) on accessible route of travel in front of A&D Pizza, abrupt change in level surface (1/2” to 3/4”) at driveway aprons.
- Crosswalk and curb ramps (multiple) at intersection of Elm and Canal Streets are confusing – one curb ramp serves two crosswalks, curb ramp(s) not perpendicular to the sidewalk, excessive slopes (11.2% to 11.8%), insufficient top level landings, crosswalk markings need repainting.
- Sidewalk cross-slope at 35 Elm Street varies from 7.0% to 10.3%; concrete deteriorated resulting in uneven and unstable surface.
- Newly constructed curb ramp in front of bank on Elm Street is non-compliant as it forces the sidewalk user to enter the street to adequately use the sidewalk. Furthermore, cross-slopes of the newly constructed sidewalk range from 7.8% to 10.8%.
- Driveway apron and sidewalk in vicinity of 53 Elm Street is severely deteriorated resulting in an uneven and unstable surface. [12]
- Curb ramp(s) at School and Elm Streets are too steep (17.6%, 19.5%), are not perpendicular to the sidewalk, have insufficient top level landings, crosswalk needs to be repainted.
- Curb ramp(s) at town hall driveway and Elm Street are too steep (15.1%, 15.2%), are not perpendicular to the sidewalk, have insufficient top level landings, crosswalk needs to be repainted.
- An abrupt change in level surface at driveway aprons (both sides of driveway) of > 1” exists at the driveway apron opposite River Street. The crosswalk from River Street enters into a deteriorated driveway and not a curb ramp. [13]

Canal Street

- Abrupt change in level surface ($> 1''$) at the curb ramp to Railroad Court.
- Curb ramp(s) at Howe Avenue and Canal Street are not perpendicular to the sidewalk, have insufficient top level landings, crosswalk needs to be repainted.
- Concrete sidewalk in vicinity of bank parking lot are severely deteriorated, broken and cracked resulting in an uneven and unstable surface; driveway apron at bank has excessive cross-slopes ranging from 9.0% to 15.1%. [14]
- Curb ramp(s) at Church and Canal Streets have excessive slopes (14.8%, 15.2%) and lack crosswalk markings.

Description of Programs: Vehicular and pedestrian right-of-way.

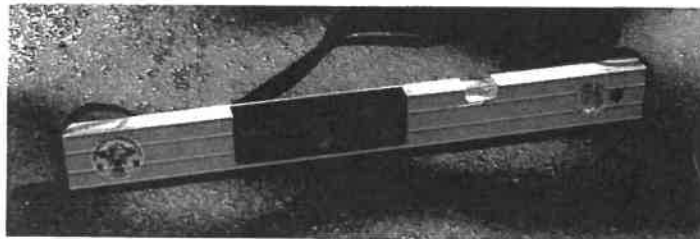
Accessibility Compliance Options: Initiate improvements and remove architectural barriers as specified.

Estimated Total Project Cost: Up to \$350,000+ depending on the extent of rehabilitation, materials used, road and drainage reconstruction, design and construction monitoring, extent of in-kind contributions (force labor, etc.).

Projected Completion Date: November 2008.



[1]



[2]



[3]



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Photographic Examples of Sidewalk and Curb Ramps in Central Business District



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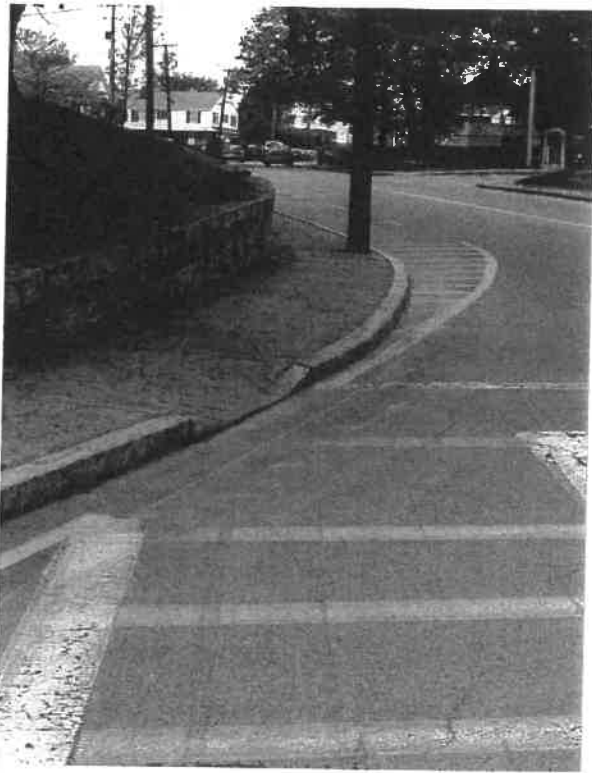


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Photographic Examples of Sidewalk and Curb Ramps in Central Business District (cont'd)



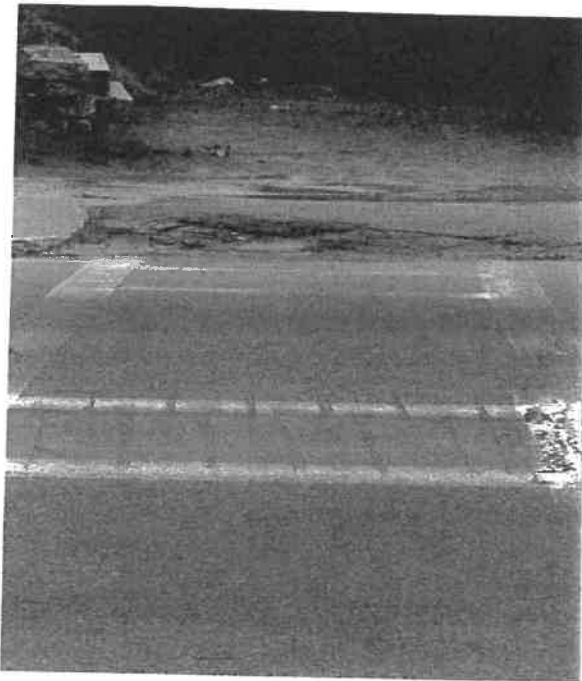
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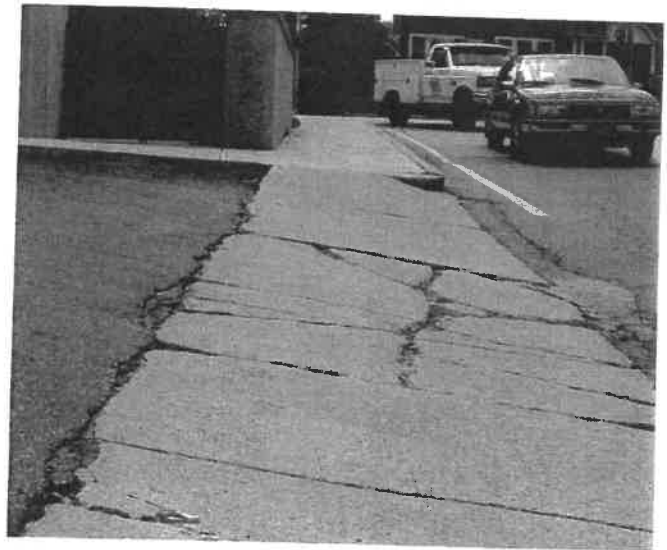
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School Buildings: Millbury Junior/Senior High School

Name: Junior/Senior High School

Location: Martin Street

Function: Public school

Responsible Party: School Committee

General Description or Obstacle Which Limits Mobility or Access: The Millbury Junior/Senior High School is a masonry two-story multi-level building which serves as a public school for grades 7-12. The building underwent a recent major renovation and rehabilitation involving both additions and improvements to the facility. A summary of accessibility concerns is provided below. Specific compliance requirements are described and are also noted on pages 22 through 24 of this plan and in 28 CFR Part 36 (Americans with Disabilities Act Accessibility Guidelines) and Massachusetts State Building Code 521 CMR (Architectural Access Board Regulations).

Description of Programs: Public school, place of assembly, recreational facilities.

Accessibility Compliance Options: Initiate improvements and remove architectural barriers as specified.

Estimated Total Project Cost: \$ 82,950

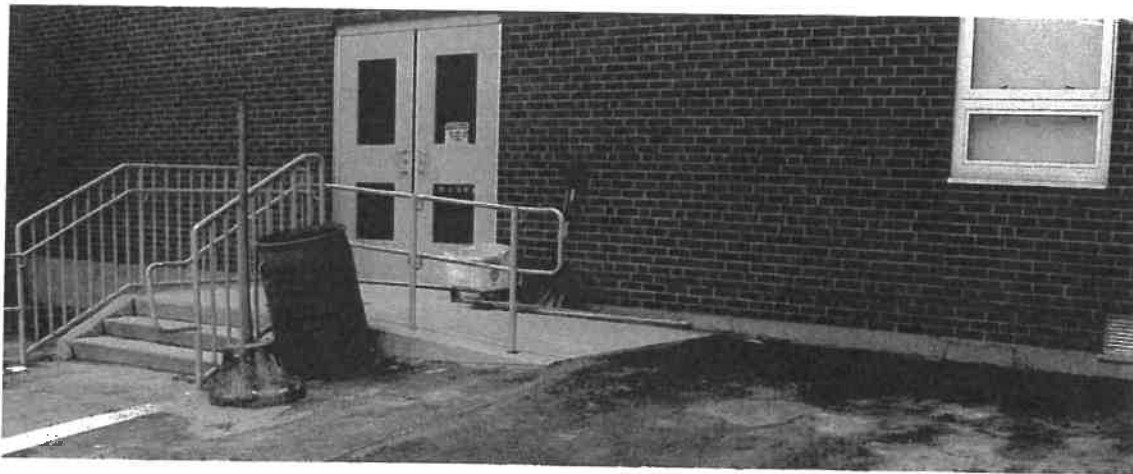
Projected Completion Date: June 2009

	Item	Cost
Building Access and Parking		
<u>High School And Junior High Main Entrance</u>		
1.	Parking in front of the building inadequate. Only 1 designated accessible space provided w/5' wide access aisle in front of high school (52 total spaces) and one designated space in front of junior high school (31 total spaces). <i>Action required: Designate three 8' wide (minimum) parking space (one van, two regular) w/ appropriate 5' or 8' accessible access aisles in front of the high school and two 8' wide (minimum) parking space (one van, one regular) w/ appropriate 5' or 8' accessible access aisles in front of the junior high school. Provide related striping and accessible signage.</i>	\$375
2.	Railings at front steps of high school do not extend the required 12" beyond the base of the stairs. <i>Action required: Provide extensions on handrails to comply with 12" requirement.</i>	\$400
3.	Closing speed of main entrance doors to high school vary from 3 to 5 seconds, exceeding the maximum 6-second closing speed. <i>Action required: Adjust the door closers such that the 6 second minimum closing speed is achieved.</i>	\$75



High School Rear Entrance

- | Item | Cost |
|---|----------|
| 1. Parking in the back of the building inadequate. Only 3 designated accessible spaces provided in the back of the high school (130 total spaces). <i>Action required: Designate five 8' wide (minimum) parking space (one van, four regular) w/ appropriate 5' or 8' accessible access aisles in the back of the high school. Provide related striping and accessible signage.</i> | \$375 |
| 2. Accessible route of travel to rear entrance exceeds maximum running slope threshold requirements of 5.0% for pathways. The existing asphalt approach to the concrete ramp has a running slope ranging from 8.2% - 8.8%. Railings at the ramp base do not extend the required 12" beyond the base of the ramp. <i>Action required: Modify the existing ramp to the rear entrance into building into a concrete fully complaint switch-back ramp. The ramp shall not exceed a running slope of 8.3% nor a 2.0% cross-slope. A 60" x 60" level area at the ramp base and top is required. Provide extensions on handrails to comply with 12" requirement.</i> | \$16,000 |
| 3. Closing speed(s) of double-door gym entrance doors vary from 3 to 4 seconds, exceeding the maximum 6-second closing speed. <i>Action required: Adjust the door closers such that the 6 second minimum closing speed is achieved.</i> | \$75 |



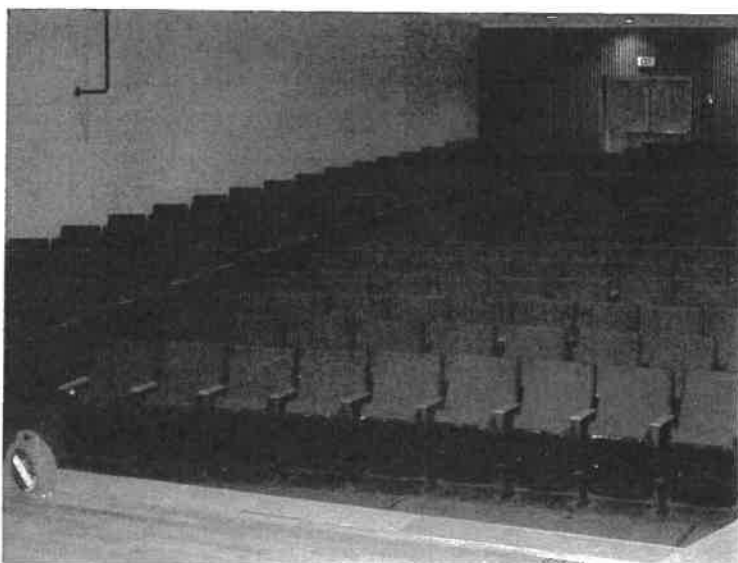
Junior High Entrance

- | | |
|---|---------|
| 1. Designated route of travel to side entrance (concrete ramp w/handrails) exceeds the maximum running slope threshold requirement of 8.3% for ramp with a slope of 8.3% to 12.2%. In addition, the railings at the ramp base do not extend the required 12" beyond the base of the ramp. <i>Action required: Modify the existing ramp to the side entrance into building into a concrete fully complaint ramp. The ramp shall not exceed a running slope of 8.3% nor a 2.0% cross-slope. Provide extensions on handrails to comply with 12" requirement.</i> | \$6,000 |
|---|---------|

Central Office

- | | |
|---|------|
| 1. Closing speed of 3 seconds to central office entry. <i>Adjust the door closer such that the 6 second minimum closing speed is achieved.</i> | \$75 |
| 2. Push/pull force of central office door is 10 lbs. <i>Action required: Adjust the door closer such that the maximum 5 lbs. push/pull force is achieved.</i> | \$75 |

Item	Cost
Auditorium	
1. The more than 500 seat auditorium, which also serves as the location for town meetings and other public events, has a limited number of armless seats and only one "non-designated" accessible space at the rear of the facility. There does not appear to be an assistive listening system in place. <i>Action required: Provide a minimum of six accessible spaces for wheelchairs dispersed in more than one location for equivalent viewing. Provide at least five armless seats and an assistive listening system.</i>	\$9,500
Gymnasium and Locker Rooms	
<u>Gym Area</u>	
1. No accessible signage identifying the gymnasium is provided. Push/pull force of main gym entrance doorway is 10 lbs. The drinking fountain is wholly non-compliant with a knob-style control, a spout height of more than 36" a.f.f. and overall non-compliant design. No designated accessible spaces for wheelchairs are provided on the gym floor. <i>Action required: Install accessible compliant signage with appropriate finish and contrast and character height and proportions. Raised and Brailled characters should also be included. Signage should be mounted at 60" a.f.f. o.c. adjacent to the latch side of the door(s). Adjust the door closers such that the maximum 5 lbs. push/pull force is achieved. Install new high/low accessible compliant drinking fountain with maximum spout height of 36" a.f.f. for low and 43" a.f.f. for high fountain. Construct wing or flange wall on side(s) of drinking fountain to minimize protrusion to a maximum of 4". Create designated wheelchair seating on gym floor.</i>	\$4,500
<u>Boy's Locker Room</u>	
1. All lockers fail to meet reach range and clear floor space requirements for wheelchair access. The drinking fountain is wholly non-compliant with a knob-style control, a spout height of more than 36" a.f.f., inadequate knee clearance and insufficient clear width space. Urinal does not have a minimum of 29" clear width space due to cross support of urinal shield. Shower wholly non-compliant due to a 5½" vertical obstruction into showers and lack of compliant shower controls. <i>Action required: Provide at least two accessible lockers meeting reach, turning radius and clear floor space thresholds. Remove urinal shield or replace with a new shield which allows for the minimum 29" clearance. Install new high/low accessible compliant drinking fountain with maximum spout height of 36" a.f.f. for low and 43" a.f.f. for high fountain. Construct wing or flange wall on side(s) of drinking fountain to minimize protrusion to a maximum of 4". Modify existing shower by removing 5 ½" berm into shower area and installing at least one compliant shower fixture and related hardware.</i>	\$5,950



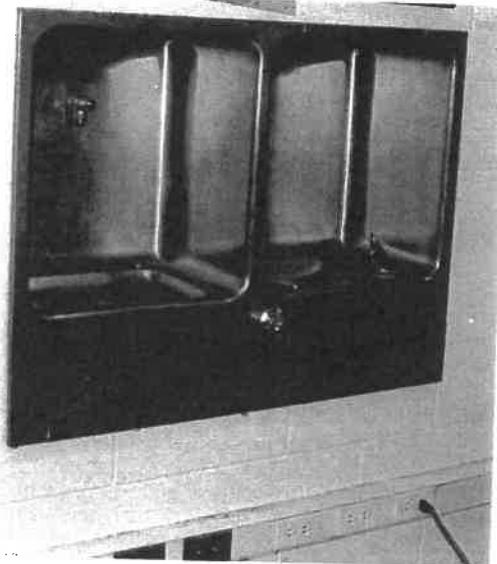
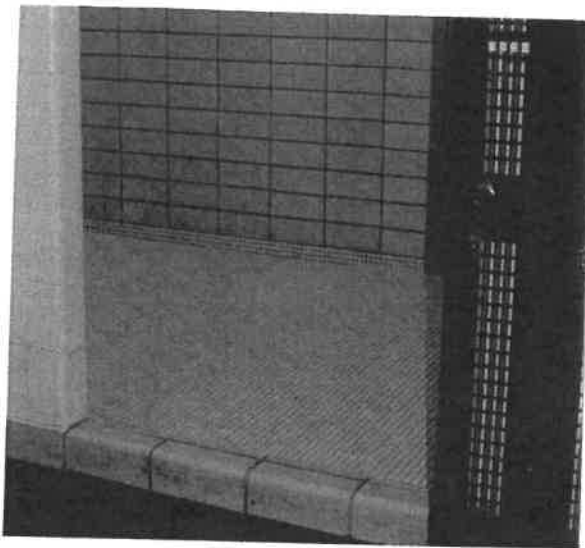
Girl's Locker Room

Item

Cost

1. All lockers fail to meet reach range, clear width and clear floor space requirements for wheelchair access. Similarly, the showers are wholly non-compliant including a restricted access due to a 23" clear width space to and a 36" x 36" turning area within the shower. The drinking fountain is wholly non-compliant with a knob-style control, a spout height of more than 36" a.f.f., inadequate knee clearance and insufficient clear width space. The sanitary napkin disposal container is 40½" a.f.f and projects more than 5" into the accessible route of travel. The water closet stall lacks a coat hook and contains 2 grab bars of 30" and 36" respectively, which is less than the required length. Action required: Provide at least two accessible lockers and showers which meet reach, turning radius, clear floor space thresholds and fixture and hardware requirements. Install new high/low accessible compliant drinking fountain with maximum spout height of 36" a.f.f. for low and 43" a.f.f. for high fountain. Provide a coat hook on the stall door at a maximum height of 54" a.f.f. Replace existing grab bars with 42" long grab bars.

\$9,200



Cafeteria(s)

1. None of the seating allows for the required minimum 27" knee clearance. Action required: Provide at least 5% of the seating to meet the required minimum knee clearance.

\$400

Library/Media Room

1. Neither the student work tables (24") nor the computer work stations (25½" – 26½") provide the minimum required 27" knee clearance. The computer based card catalogue is on a table which is over 39 ½" a.f.f. The copy machine is not on an accessible route of travel. The shelves containing video items have only a 26" clear width space. Action required: Provide at least 5% of the work table seating and computer work stations to meet the required minimum 27" knee clearance. Place the card catalogue computer work station on a table which is 28" to 34" a.f.f. and which provides a minimum 27" knee clearance. Relocate the copy machine such that it is on an accessible route of travel. Move six bookcases approximately 12" to create a 36" clear width space to the video items display.

\$750

Item	Cost
Common Areas (hallways, stairs, etc.)	
<u>High school level one hallway along gymnasium</u>	
1. Seven of the athletic "Hall of Fame" display cases have a leading edge between 27" and 80" from the finish floor surface and project more than 4" into the route of travel. <u>Action required:</u> Construct extensions below the display cases to the surface of the finish floor which are detectable by a cane.	\$2,450
<u>High school level one ramp to music room</u>	
1. Top handrail is 33" a.f.f., which is less than the minimum 34". <u>Action required:</u> Replace existing handrails with fully compliant railings with the top railing at 34" – 38" a.f.f.	\$2,000
<u>High school level two connecting hallway</u>	
1. Lower segment of connecting hallway has a running slope of 5.3% to 6.6%, which exceeds the maximum 5.0% running slope requirement for walkways. Furthermore, no handrails are provided as required for "ramps" of up to 8.3% slope. <u>Action required:</u> Erect handrails on both sides of the ramp on those areas exceeding a 5% running slope. The handrails shall be continuous, 1-1/4" to 1-1/2" in outside diameter, and round or oval in shape; handrails to be provided in pairs, one at a height of 34" - 38" above the ramp surface and the lower handrail at a height between 18" and 20"; handrails to be 1-1/2" from the mounted surface and should extend 12" beyond the bottom of the ramp.	\$500
<u>High school level one drinking fountain</u>	
1. Drinking fountain near office has a leading edge of between 27" and 80" and protrudes 10" into the accessible route of travel. Two drinking fountains near elevators are non-functional and non-complaint. <u>Action required:</u> As a sufficient number of drinking fountains exist on this floor level, remove these three drinking fountains.	\$150
<u>High school level two drinking fountain</u>	
1. Hi-low drinking fountain with a leading edge of between 27" and 80" and protrudes 7" into the accessible route of travel. Hi-low drinking fountain with a leading edge of between 27" and 80" and protrudes 5" into the accessible route of travel; spigot height is 37" a.f.f., which exceeds maximum allowed by 1". <u>Action required:</u> Erect wing walls on both sides of both companion fountains. Lower non-compliant (spigot height) fountain by 1" to maximum 36" height a.f.f.	\$1,200
<u>Junior high school level one drinking fountain</u>	
1. Non-compliant knob-style drinking fountain with a spigot height of 44" a.f.f. and no knee clearance. <u>Action required:</u> Install new accessible compliant drinking fountain with maximum spout height of 36" a.f.f. Construct wing or flange wall on both side(s) of drinking fountain to minimize protrusion to a maximum of 4".	\$4,500
<u>Junior high school level two drinking fountain</u>	
1. Companion drinking fountains with a leading edge of between 27" and 80" and protruding greater than 5" into the accessible route of travel. Spigot heights are 42" a.f.f., which exceeds the maximum allowed by 6". <u>Action required:</u> Erect wing or flange walls on sides of companion fountains. Lower one fountain by 6" to attain maximum spigot height of 36" height a.f.f.	\$1,200

Classrooms

High school

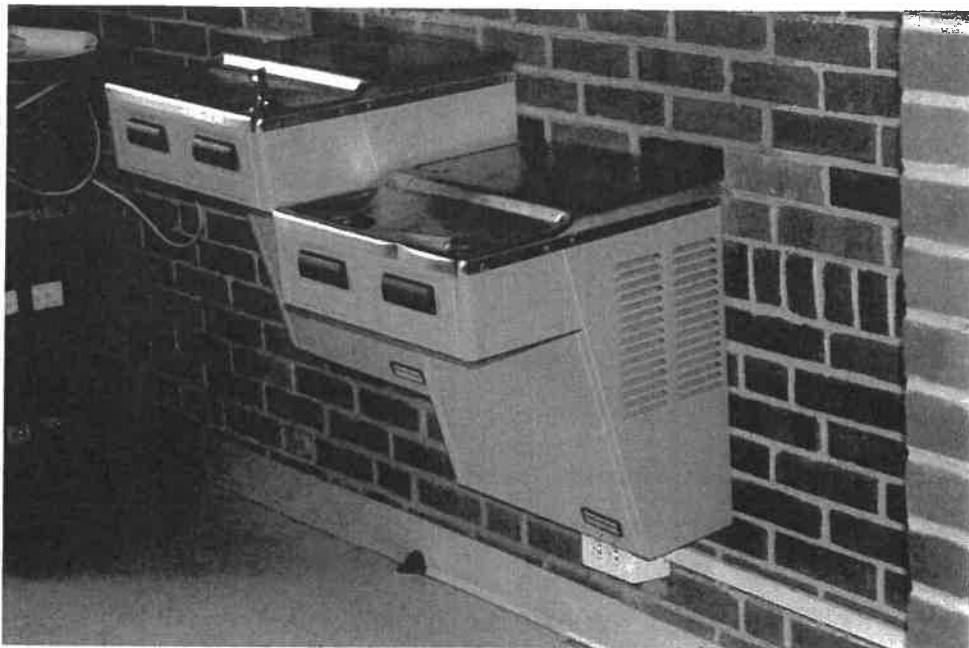
1. The student work tables in the home economics and science labs have only 24½" of knee clearance. None of the sinks and related dispensers are compliant due to inadequate knee clearance, controls and reach ranges. The remaining classrooms including the computer lab have work spaces and tables with inadequate knee clearances. *Action required: Provide at least 5% of all work table seating and computer work stations to meet the required minimum 27" knee clearance (as needed). Modify at least one home economics and science work station to fully comply with sink and dispenser accessibility requirements as detailed and specified elsewhere in this document.*

\$4,500

Junior high school

1. The student work tables in the computer and science labs have less than 27" of knee clearance. None of the science lab sinks and related dispensers are compliant due to inadequate knee clearance, controls and reach ranges. The remaining classrooms have work spaces and tables with inadequate knee clearances. *Action required: Provide at least 5% of all work table seating and computer work stations to meet the required minimum 27" knee clearance (as needed). Modify at least one science lab work station to fully comply with sink and dispenser accessibility requirements as detailed and specified elsewhere in this document.*

\$4,500



Bathrooms

Junior and Senior High School

1. The chart on the following page summarizes the various area of non-compliance in the bathrooms of both buildings. Nineteen bathrooms were assessed with most requiring minor modifications. *Action required: Modifications as stated on the following page.*

\$8,200

Junior and Senior High School Bathrooms continued

Location	Door	Sign	Mirror	Dispensers	Toilet Paper Dispenser	Sink	Urinal	Stall Door	Grab Bars	Water Closet
HS Boy's 1 st Floor	C	C	41½" aff	55" (towel)	C	C	C	Hook, self-close	C	C
HS Girl's 1 st Floor	C	C	42" aff	55" (towel)	C	C	NA	Hook, self-close	C	C
HS Men's 1 st Floor (gym)	7-8 lbs	C	42" aff	C	C	C	28" clearance	No self-close	C	C
HS Women's 1 st Floor (gym)	C	C	42" aff	C	C	C	NA	Hook, self-close	C	C
HS Boy's 1 st Floor	C	C	C	C	C	C	27" clearance	Hook @ 65 ½"	2 @ 30"	C
HS Girl's 1 st Floor	5 sec	C	C	C	C	C	NA	Hook @ 65 ½"	2 @ 30"	C
HS Men's 1 st Floor (staff)	C	None	C	C	C	C	NA	C	2 @ 30"	C
HS Women's 1 st Floor (staff)	C	None	C	C	C	C	NA	C	2 @ 30"	C
HS Boy's 2nd Floor	C	C	42½" aff	C	C	C	28" clearance	Hook, self-close	C	C
HS Girl's 2nd Floor	C	C	43" aff	C	C	C	NA	Hook, self-close	C	C
HS Boy's 2nd Floor	15 lbs	C	C	55" (towel)	C	C	24" clearance	Hook @ 66"	2 @ 30"	C
HS Girl's 2nd Floor	8 lbs	C	C	45" (soap)	C	C	NA	Hook @ 66"	2 @ 30"	C
JHS Boy's 1 st Floor	6 lbs	C	C	55" (towel)	C	C	25½" clearance	Hook, self-close	C	C
JHS Girl's 1 st Floor	10 lbs	C	C	55" (towel)	C	C	NA	C	C	C
JHS Office	C	C	C	C	C	C	NA	Hook @ 60"	C	C
JHS Boy's 2nd Floor	6 lbs	C	C	55" (towel)	C	C	28" clearance	No coat hook	C	C
JHS Girl's 2nd Floor	8 lbs	C	C	55" (towel)	C	C	NA	No coat hook	C	C
JHS Teacher's	C	C	42" aff	55" (towel)	C	Wholly NC	NA	No coat hook	C	C
JHS SPED	C	C	C	55" (towel)	C	C	NA	No coat hook	C	C
Total Estimated Cost	\$600	\$100	\$400	\$500	\$0	\$2,500	\$400	\$700	\$3,000	\$0

NC = Non-compliant
C = Compliant
NA = Not Applicable

The following standards should be met: bottom of mirror shall be at a maximum of 40" a.f.f.; dispensers and similar devices must be operable with one hand or a closed fist at a maximum height of 42" a.f.f.; toilet paper dispensers shall be at a minimum 24" a.f.f. and within 36" of the rear wall; urinals shall have a minimum 29" clear width space; grab bars shall be 42" long, one located at the back wall and one located on the side wall; door closers must operate such that the sweep period of the closer from an open door position of 90 degrees to closure shall take at least six seconds; interior hinged doors must not exceed a force of 5-lb. to pull or push open; bathroom stalls shall have a coat hook 54" aff; bathroom stall doors shall be self-closing.

School Buildings: Raymond E. Shaw School

Name: Raymond E. Shaw School

Location: Elmwood Street

Function: Public school

Responsible Party: School Committee

General Description or Obstacle Which Limits Mobility or Access: The Raymond E. Shaw School is a masonry one-story building which serves as a public school for grades 4-6. The building appears to have had only minor renovations and improvements in recent years. A summary of accessibility concerns is provided below. Specific compliance requirements are described and are also noted on pages 22 through 24 of this plan and in 28 CFR Part 36 (Americans with Disabilities Act Accessibility Guidelines) and Massachusetts State Building Code 521 CMR (Architectural Access Board Regulations).

Description of Programs: Public school, place of assembly, recreational facilities.

Accessibility Compliance Options: Initiate improvements and remove architectural barriers as specified.


Estimated Total Project Cost: \$ 201,325

Projected Completion Date: June 2009

Item	Cost
<u>Building Access and Parking</u>	
1. Parking in front of the building is inadequate. Two designated accessible spaces are provided with a 6' wide access aisle. No signage or designated accessible route of travel from the parking spaces is provided. <u>Action required:</u> Designate three 8' wide (minimum) parking space (one van, two regular) w/ appropriate 5' or 8' accessible access aisles. Provide related striping, accessible signage and a designated route of travel from the parking area.	\$375
<u>Central Office</u>	
1. Counter height of 44 3/4". <u>Action required:</u> Construct a section of counter to be no greater than 34" a.f.f. with appropriate knee clearance.	\$350
2. Access to office/reception area behind counter is restricted by a 27" wide opening with a swinging panel. <u>Action required:</u> Increase opening to a minimum of 32".	\$350
3. All interior office doors have non-compliant knob-style hardware. <u>Action required:</u> Replace all door hardware with levers or other appropriate and compliant hardware.	\$750



<u>Cafetorium</u>	
1. The 27" high stage area is non-compliant and can only be accessed by two different sets of stairs. The front stairs lack handrails. <u>Action required:</u> Install an interior vertical platform lift to access the stage area. Install handrails at compliant height levels and which extend 12" beyond the base and top of the stairs.	\$10,500
2. None of the seating allows for the required minimum 27" knee clearance. <u>Action required:</u> Provide at least 5% of the seating to meet the required minimum knee clearance.	\$400

Item	Cost
<u>Gym Area - Boy's Locker Room</u>	
<p>1. Access to the boy's locker room is non-compliant with knob-style door hardware and a push/pull force of 10 lbs. All lockers fail to meet reach range and clear floor space requirements for wheelchair access. The drinking fountain is wholly non-compliant with a knob-style control, inadequate knee clearance and insufficient clear width space. Urinal, toilet, mirror and dispensers are all wholly non-compliant due to the lack of any accessible features and inadequate height levels. Shower wholly non-compliant due to a 5" vertical obstruction into showers and lack of compliant shower controls. <u>Action required:</u> Replace door hardware with a lever or other appropriate and compliant hardware. Adjust door closer to comply with maximum 5 lbs. push/pull force requirement. Provide at least two accessible lockers meeting reach, turning radius and clear floor space thresholds. Install a fully compliant urinal, toilet, sink, mirror and required dispensers. Install new accessible compliant drinking fountain with maximum spout height of 36" a.f.f. Modify existing shower by removing 5" berm into shower area and installing at least one compliant shower fixture and related hardware.</p>	\$21,950
<u>Gym Area - Girl's Locker Room</u>	
<p>1. Access to the girl's locker room is non-compliant with knob-style door hardware and a push/pull force of 8 lbs. All lockers fail to meet reach range, clear width and clear floor space requirements for wheelchair access. Similarly, the showers are wholly non-compliant including a restricted access due to a 23" clear width space to and a 36" x 36" turning area within the shower. The drinking fountain is wholly non-compliant with a knob-style control, a spout height of more than 36" a.f.f., inadequate knee clearance and a protrusion of more than 5" into the accessible route of travel. The water closet stalls, water closet, sinks and dispensers are non-compliant, lack accessible features and exceed height and reach range standards. <u>Action required:</u> Replace door hardware with a lever or other appropriate and compliant hardware. Adjust door closer to comply with maximum 5 lbs. push/pull force requirement. Provide at least two accessible lockers and showers which meet reach, turning radius, clear floor space thresholds and fixture and hardware requirements. Install a new accessible compliant drinking fountain with maximum spout height of 36" a.f.f. Install at least one fully compliant water closet, sink, and related fixtures and dispensers.</p>	\$25,200
	
<u>Library</u>	
<p>1. Neither the student work tables (26") nor the computer work stations (24") provide the minimum required 27" knee clearance. The check-out counter is 39½" a.f.f and exceeds the maximum height requirements. Access to an internal courtyard area from the library can only be achieved through a series of stairs and landings. <u>Action required:</u> Provide at least 5% of the work table seating and computer work stations to meet the required minimum 27" knee clearance. Construct a section of counter to be no greater than 34" a.f.f. Eliminate access to courtyard area from the library.</p>	\$1,250
<u>Nurse's Office</u>	
<p>1. All office doors (5) have non-compliant knob-style hardware. <u>Action required:</u> Replace all door hardware with levers or other appropriate and compliant hardware.</p>	\$750
<p>2. Two bathrooms located in the nurse's office area are both wholly non-compliant including door hardware, signage, dispensers and all toilet fixtures. <u>Action required:</u> Construct one fully compliant single-user accessible toilet room.</p>	\$13,500

Item	Cost
<u>Hallways</u>	
1. A display case has a leading edge between 27" and 80" from the finish floor surface and project more than 4" into the route of travel. <u>Action required:</u> Construct extensions below the display case to the surface of the finish floor which are detectable by a cane.	\$350
2. Two companion drinking fountains with non-compliant knee clearances and clear width space. <u>Action required:</u> Install two new compliant accessible drinking fountains with maximum spout heights of 36" a.f.f.	\$4,500
3. Wall mounted public telephone has only 28" of clear width space and a height of 58" a.f.f., both of which do not comply with accessibility standards. <u>Action required:</u> Remove telephone.	\$100
4. None of the lockers appear to meet requirements for reach range and door hardware requirements. <u>Action required:</u> Provide up to 5% of the lockers as fully accessible.	\$3,500
5. Lack of interior accessible signage throughout the building (classrooms, offices, bathrooms, etc.). <u>Action required:</u> Install accessible compliant signage with appropriate finish and contrast and character height and proportions. Raised and Brailled characters should also be included. Signage should be mounted at 60" a.f.f. o.c. adjacent to the latch side of the door	\$2,000
<u>Classrooms</u>	
1. All of the entry and interior classroom doors have non-compliant knob-style hardware. <u>Action required:</u> Replace all door hardware (approximately 80 in total) with levers or other appropriate and compliant hardware.	\$12,000
2. The student work tables and desks in nearly all of the classrooms have only 23½" to 26" of knee clearance. None of the sinks and related dispensers in the art and science classrooms are compliant due to inadequate knee clearance, controls and reach ranges. <u>Action required:</u> Provide at least 5% of all work table seating and computer work stations to meet the required minimum 27" knee clearance (as needed). Modify at least one art and science work station in each classroom to fully comply with sink and dispenser accessibility requirements as detailed and specified elsewhere in this document.	\$8,500
<u>Bathroom</u>	
1. The chart on the following page summarizes the various area of non-compliance in the bathrooms of the building. Ten bathrooms were assessed. Of these, two were designated as "handicapped accessible", two were men's and women's bathrooms, two were staff bathrooms and four were regular student bathrooms. <u>Action required:</u> Modifications as stated on the following page.	\$95,000



Raymond E. Shaw School Bathrooms continued

Location	Door	Sign	Mirror	Dispensers	Toilet Paper Dispenser	Sink	Urinal	Stall Door	Grab Bars	Water Closet
Girl's Accessible Bathroom	C	NC	43 1/2" aff	57" (towel)	NC (height)	NC	NA	Hook, self-close	NC (H)	NC (H,L)
Boy's Accessible Bathroom	C	NC	43" aff	57" (towel)	NC (height)	NC	NC (height)	Hook, self-close	NC (H)	NC (H,L)
Men's Bathroom	C	NC	49 1/2" aff	62 1/2" (towel)	NC (height)	NC	NC (height)	NC	NC (none)	NC
Women's Bathroom	C	NC	49 1/2" aff	62 1/2" (towel)	NC (height)	NC	NA	NC	NC (none)	NC
Staff Bathroom	C	NC	NC	NC	NC	NC	NC	NA	NC (none)	NC
Staff Bathroom	C	NC	NC	NC	NC	NC	NC	NA	NC (none)	NC
Girl's Bathroom	C	NC	NC	NC	NC	NC	NA	NC	NC (none)	NC
Boy's Bathroom	C	NC	NC	NC	NC	NC	NC	NC	NC (none)	NC
Girl's Bathroom	C	NC	NC	NC	NC	NC	NA	NC	NC (none)	NC
Boy's Bathroom	C	NC	NC	NC	NC	NC	NC	NC	NC (none)	NC

NC = Non-compliant
 C = Compliant
 NA = Not Applicable

H = Height
 L = Length

Total Estimated Cost: \$95,000

The following standards for fourth to sixth grade should be met: bottom of mirror shall be at a maximum of 31" a.f.f.; dispensers and similar devices must be operable with one hand or a closed fist at a maximum height of 42" a.f.f.; toilet paper dispensers should be between 17" to 19" a.f.f. and within 36" of the rear wall; urinals shall have a minimum 29" clear width space and have a maximum rim height of 15" a.f.f.; grab bars shall be 42" long, one located at the back wall and one located on the side wall with a height of 25" to 27" a.f.f.; seat height of water closets should be between 15" and 17" a.f.f.; door closers must operate such that the sweep period of the closer from an open door position of 90 degrees to closure shall take at least six seconds; interior hinged doors must not exceed a force of 5-lb. to pull or push open; bathroom stalls shall have a coat hook 54" a.f.f.; bathroom stall doors shall be self-closing.

School Buildings: Elmwood Street School

Name: Elmwood Street School

Location: Elmwood Street

Function: Public school

Responsible Party: School Committee

General Description or Obstacle Which Limits Mobility or Access: The Elmwood Street School is a masonry one-story building which serves as a public school for grades pre-kindergarten to third. The building underwent a recent major renovation and rehabilitation in 2003. A summary of accessibility concerns is provided below. Specific compliance requirements are described and are also noted on pages 22 through 24 of this plan and in 28 CFR Part 36 (Americans with Disabilities Act Accessibility Guidelines) and Massachusetts State Building Code 521 CMR (Architectural Access Board Regulations).

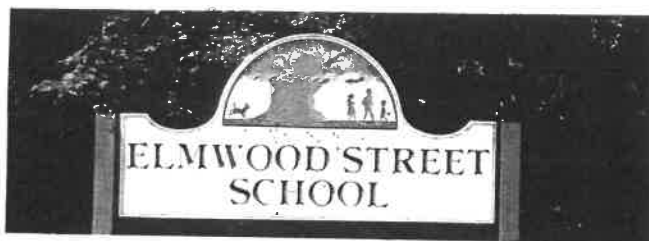
Description of Programs: Public school, place of assembly, recreational facilities.

Accessibility Compliance Options: Initiate improvements and remove architectural barriers as specified.

Estimated Total Project Cost: \$ 15,700

Projected Completion Date: June 2009

Item	Cost
<u>Central Office</u>	
1. Interior hallway alarm system has a leading edge between 27" and 80" from the finish floor surface and project more than 4" into the route of travel. <i>Action required: Construct extensions below the alarm system to the surface of the finish floor which are detectable by a cane.</i>	\$350
<u>Library</u>	
1. The student work tables provide only 23½" of knee clearance; book stacks provide only 31 to 31½" of clear width space. <i>Action required: Provide at least 5% of the work table seating to meet the required minimum 27" knee clearance. Re-adjust book stacks to achieve 36" required clear width space..</i>	\$400
<u>Cafetorium</u>	
1. The stage area is accessed by a 36" x 48" vertical lift, which is less than the minimum standards. <i>Action required: Replace the existing lift with a compliant 36" x 54" or larger vertical platform lift to access the stage area.</i>	\$9,500
2. None of the seating allows for the required minimum 27" knee clearance. <i>Action required: Provide at least 5% of the seating to meet the required minimum knee clearance.</i>	\$400



Miscellaneous/Common Areas

- | | |
|---|-------|
| 1. Railings at stairwells #5 and #1 do not extend the required 12" beyond the base of the stairs. <i>Action required: Provide extensions on handrails to comply with 12" requirement.</i> | \$500 |
| 2. Picnic tables in interior courtyard area are not compliant, lacking adequate clear width space and knee clearance. <i>Action required: Provide at least one compliant picnic table with required clear width and knee clearance.</i> | \$500 |

Item	Cost
<u>Classrooms</u>	
1. Most of the classroom telephones are mounted at a height beyond accessible reach range standards. <i>Action required: As these are not public telephones, lowering will be required only as a matter of a reasonable accommodation.</i>	NA
2. Toilet room serving rooms 102 and 104 – bottom of mirror at 36" a.f.f, which exceeds maximum height of 31" for children; toilet paper dispenser mounted at 22" a.f.f. which exceeds the range for pre-kindergarten. <i>Action required: Lower mirror to 31" a.f.f. and toilet paper dispenser to 14" 17" a.f.f.</i>	\$250
3. Toilet room serving rooms 105 and 107 – toilet paper dispenser mounted at 22" a.f.f. which exceeds the range for kindergarten to third grade. <i>Action required: Lower toilet paper dispenser to 14" to 17" a.f.f.</i>	\$150
4. Toilet room serving rooms 108 and 110 – toilet paper dispenser mounted at 22" a.f.f. which exceeds the range for kindergarten to third grade. <i>Action required: Lower toilet paper dispenser to 14" to 17" a.f.f.</i>	\$150
5. Toilet room serving rooms 208 and 209 – toilet paper dispenser mounted at 29" a.f.f. which exceeds the range for kindergarten to third grade; top of water closet seat at 11" a.f.f. which is not within the range for kindergarten to third grade. <i>Action required: Lower toilet paper dispenser to 14" to 17" a.f.f.; raise water closet to within range of 12" to 15" a.f.f.</i>	\$300
6. Toilet room serving rooms 209 and 211 – toilet paper dispenser mounted at 29" a.f.f. which exceeds the range for kindergarten to third grade; top of water closet seat at 11" a.f.f. which is not within the range for kindergarten to third grade. <i>Action required: Lower toilet paper dispenser to 14" to 17" a.f.f.; raise water closet to within range of 12" to 15" a.f.f.</i>	\$300
<u>Teacher's Lounge</u>	
1. A clear route of travel exists to and within the lounge area. However, no knee clearance exists under the sink; soap and towel dispensers exceed reach range requirements; wall cabinets are mounted at a height which exceeds reach range standards. <i>Action required: Compliance may be required in the future as a reasonable accommodation for staff with mobility limiting disabilities.</i>	NA
<u>Bathroom</u>	
1. The chart on the following page summarizes the various area of non-compliance in the bathrooms of the building. Thirteen bathrooms were assessed. Of these six were student bathrooms. <i>Action required: Modifications as stated on the following page.</i>	



\$2,900

Elmwood Street School Bathrooms continued

Location	Door	Sign	Mirror	Dispensers	Toilet Paper Dispenser	Sink	Urinal	Stall Door	Grab Bars	Water Closet
Men's 1 st Floor	10 lbs	C	C	C	C	C	28" clearance	C	C	C
Women's 1 st Floor	C	C	C	C	C	C	NA	C	C	C
Boy's 1 st Floor	8 lbs	C	40" aff	C	23" aff	C	C	C	42" aff	16" aff
Girl's 1 st Floor	C	C	40" aff	C	19 1/2" aff	C	NA	C	36" aff	C
Men's 2 nd Floor	C	C	C	C	C	C	C	C	C	C
Women's 2 nd Floor	C	C	C	C	C	C	NA	C	C	C
Boy's 2 nd Floor	C	C	40" aff	C	23" aff	C	C	C	36 1/2" aff	C
Girl's 2 nd Floor	C	C	40" aff	C	23" aff	C	NA	C	36" aff	C
Men's 2 nd Floor	C	C	C	C	C	C	C	C	C	C
Women's 2 nd Floor	C	C	C	C	C	C	NA	C	C	C
Boy's 2 nd Floor	8 lbs	C	36" aff	C	32" aff	C	C	C	C	C
Girl's 2 nd Floor	8 lbs	C	37" aff	C	33" aff	C	NA	C	C	C
Office	C	C	C	C	C	C	NA	C	C	C
Total Estimated Cost	\$200	NA	\$750	NA	\$600	NA	\$100	NA	\$750	\$500

NC = Non-compliant

C = Compliant

NA = Not Applicable

Total Estimated Cost: \$2,900

The following standards for pre-kindergarten to third grade should be met: bottom of mirror shall be at a maximum of 31" a.f.f.; dispensers and similar devices must be operable with one hand or a closed fist at a maximum height of 42" a.f.f.; toilet paper dispensers should be between 14" to 17" a.f.f. for kindergarten to third grade and 14" a.f.f. for pre-kindergarten and within 36" of the rear wall; urinals shall have a minimum 29" clear width space and have a maximum rim height of 15" a.f.f.; grab bars shall be 42" long, one located at the back wall and one located on the side wall with a height of between 20" to 25" a.f.f. for kindergarten to third grade and 18" to 20" a.f.f. for pre-kindergarten; seat height of water closets should be between 12" to 15" a.f.f. for kindergarten to third grade and 11 1/2" to 12 1/2" a.f.f. for pre-kindergarten; door closers must operate such that the sweep period of the closer from an open door position of 90 degrees to closure shall take at least six seconds; interior hinged doors must not exceed a force of 5-lb. to pull or push open; bathroom stalls shall have a coat hook 54" a.f.f.; bathroom stall doors shall be self-closing.

School Building: Dorothy School Building (Leased for Public Accommodation)

Name: Dorothy School Building

Location: Millbury Avenue

Function: Private daycare facility (lease).

Responsible Party: School Department

General Description or Obstacle Which Limits Mobility or Access: The Dorothy School Building is a masonry 1½ story multi-level building which formally housed a public school. It is currently leased for use as a private daycare facility for infants, toddlers and young children.

Access to building and services: The building is wholly non-compliant and does not meet current accessibility standards. The facility lacks designated accessible parking and an accessible route of travel into the building. Both the side and front entrances are inaccessible and consist of deteriorating and unsafe masonry steps with non-compliant handrails and entryways (noncompliant doors and hardware).

First Floor: The first floor level contains classrooms and two bathrooms (located at both ends of the building). The bathrooms are wholly non-compliant lacking grab bars, accessible fixtures and related features. The clear width space into the classrooms is generally acceptable and meet the minimum 32" clear width space requirement. Accessible signage is missing throughout the first floor, door hardware (knob-style) is non-compliant and the stair railings do not extend the required 12" from the top and base of the stairs. A floor grate in the center of the hallway has openings of 1" which exceeds the maximum threshold of ½". The hallway also contains a wholly non-compliant (inadequate clearances, knob-style levers, etc.) double basin sink for use by staff and students.

Second Floor: The second floor level consists of 2 rooms (one at each end of the building) with one room serving as an office and the other used for storage. Similar to the first floor, all door hardware is non-compliant and no accessible signage exists. Access to this level can only be attained by using a set of stairs (7 stair treads) at either end of the building. A bathroom located in the room utilized as an office lacks adequate turning space and is wholly non-compliant in regards to sink, toilet and related fixtures.

Summary: The 1½ Dorothy School Building is on 3 separate levels with rooms and operations on two levels and the third level created by the side and front entrance construction. As a result, simple modification of existing conditions for accessibility compliance is not practical. Architectural design including substantial renovations to achieve full barrier removal is required. The architectural solution chosen will have direct impact on each barrier removal element on the site and in the building. Furthermore, based on the work required to bring the building into compliance with MA 521 CMR and ADAAG, it is highly likely that full code compliance with the Massachusetts State Building Code will also be required due to the substantive construction cost as a percentage of building value. Depending on the desired architectural alternative to address the various compliance issues, the actual construction solutions(s) and related cost may vary. The town must decide whether it is cost feasible to initiate such construction or dispose of the property. An overall summary of the major areas of non-compliance and estimated cost is provided below.

Description of Programs: Private daycare facility.

Accessibility Compliance Options: Initiate improvements and remove architectural barriers as required. Again, costs will vary tremendously based upon design solution.

Estimated Total Project Cost: \$ 296,250+

Projected Completion Date: September 2009



School Building: Dorothy School Building (Leased for Public Accommodation)
- continued

<u>Obstacle Which Limits Mobility or Access</u>	<u>Cost Estimate</u>
1. Parking, accessible route of travel, entrance repairs	\$15,000
2. Elevator (4-stop) and on-grade entrance	\$175,000
3. Bathrooms	\$30,000
4. Interior door hardware	\$1,500
5. Room signage	\$500
7 Related building modifications (modify wash sink, adjust door closers, install compliant railings, replace floor grate, etc.)	\$15,000
Subtotal	\$237,000
Contingency (10%)	\$23,700
Architect design fee	\$35,550
Mandated renovations per MSBC	Unknown
Total	\$296,250+



Parks and Recreation Facilities

Name: Active town recreation and play facilities.

Location: Town-wide.

Description of Facility: Millbury Parks and Recreation Facilities.

Function: Active recreation and play facilities.

Responsible Party: Parks and Recreation

General Description or Obstacle Which Limits Mobility or Access: All facilities lack fully compliant and accessible parking areas with signage. An accessible route of travel to facilities, individual play or recreation components and within play areas is non-existent throughout all recreation areas. In general, a paved or hard packed accessible pathway (48" wide w/ a 36" clear space) from the respective parking area to all facility programs and services is required. Although the Washington Street Park play area and Elmwood School play areas appear to contain accessible components, due to the lack of an accessible route to and within the play areas, they remain non-compliant. Two recreational facilities (Washington Street Park, Windle Field) contain a food concession stand inclusive of bathrooms and other amenities. Both of these bathroom facilities are wholly non-compliant with state and federal accessibility requirements. Benches, picnic tables and bleachers need to consist of accessibility features. Currently, none of the picnic tables provide the required minimum 27" knee clearance, no benches have accompanying level surfaces for a wheelchair and only a few of the bleachers have railings. Food service counters of the concession stands at Windle Field and Washington Street Park are too high at 39¾" and 41½" respectively (maximum 34" height with minimum 27" knee clearance required) and therefore are not accessible. The Windle Field facility also contains a non-compliant water fountain outside the public bathrooms. A general summary chart is provided below, followed by a more detailed description of each facility.

Accessibility Requirements: Under Section 19 of 521 CMR, all recreation facilities shall be accessible and on an accessible route of travel that is paved or hard packed. Other components of a facility (i.e. toilet rooms, ramps, picnic tables, etc.) must also fully comply with 521 CMR. Under the ADAAG standards, at a minimum, an accessible route must be provided up to and through all play areas and equipment. Current ADAAG Supplements [inclusive of State and Local Government Facilities (1998), Children's Environments (1998), Play Areas (2000) and Recreation Facilities (2002)] are considered to be "guidelines" that have not been incorporated into the Department of Justice's accessibility standards and therefore are not enforceable. A reprint of the United States Access Board "*Summary of Accessibility Guidelines for Recreation Facilities*" and "*Summary of Accessibility Guidelines for Play Areas*" is provided in Attachment H.

Public spaces, recreational facilities and playgrounds are within the jurisdiction of ADA and therefore must conform to those standards pertaining to accessible routes, reach ranges and similar standards for ancillary features (bathroom, benches, picnic tables, water fountains, parking, etc.). Play and recreational areas must be located on an accessible route with accessible routes to the various play structures, recreational facilities and equipment. The accessible route connecting ground level components within a play area should be 60" wide with some variation allowed depending on length of travel route and size of play area. The accessible route should be stable, firm and slip-resistant and is preferred to be the same as the general route of travel. The actual playground surface must also be stable, firm and slip-resistant as well as "impact attenuating" to provide a safe fall area around play equipment. Acceptable materials include interlocking rubber matting, plastic matting, poured in place rubber surfacing and specially bonded wood fibers. The sole use of sand or wood chips, the material used in Millbury's play areas, are not in compliance with accessibility standards. These materials can be used in conjunction with the acceptable materials as part of the overall design scheme. Play equipment should be as accessible as possible with "guidance" pertaining to this provided in Attachment H as previously noted.

Description of Programs: Active recreation and play facilities.

Accessibility Compliance Options: Initiate improvements and remove architectural barriers as specified.

Estimated Total Project Cost: \$ 512,075

Projected Completion Date: November 2009

Parks and Recreation Facilities continued

Name of Facility	Parking, Striping, Signage	Accessible Route to Facility	Accessible Route w/in Facility	Bathroom Facilities	Portable Toilets	Firm, Stable Surface for Wheelchair	Accessible Picnic Table & Benches	Bleacher Seating	Water Fountain	Concession Stand (counter)	Ramps	Date of Completion	Estimated Cost
Jr/Sr High School	●	●	●	NA	NA	NA	NA	●	NA	NA	●	9/08	\$5,125
Elmwood St. School	C	●	●	NA	NA	NA	●	NA	NA	NA	NA	9/09	\$171,750
Shaw Middle School	●	●	●	NA	NA	●	●	NA	NA	NA	NA	9/09	\$71,900
Greenwood St. Park	●	●	NA	NA	C	NA	NA	●	NA	NA	NA	9/08	\$7,600
Dorothy Pond Tot Lot	●	●	NA	NA	NA	NA	NA	NA	NA	NA	NA	9/08	\$4,650
East Millbury Park	●	●	●	NA	C	NA	NA	●	NA	NA	NA	9/08	\$28,450
Windle Field	●	●	●	●	NA	NA	●	●	●	●	●	9/09	\$52,650
Washington St. Park	●	●	●	●	C	NA	●	●	NA	●	NA	9/09	\$142,050
Jacques Park	●	●	●	NA	●	NA	NA	●	NA	NA	NA	9/08	\$27,900
												Total	\$512,075

● = Non-compliant
C = Compliant
NA = Not Applicable


Millbury Jr./Sr. High School Track and Field: High school and community recreation facility containing a rubberized track, football field, baseball field, softball field, dugouts and bleacher seating. No designated accessible parking is provided next to this facility. The accessible route to the track and ball fields from the parking lot includes an asphalt "ramp" with an 8.8% running slope and no handrails. There exists no accessible route to the baseball bleachers or dugout areas. Furthermore, fully compliant railings are not provided on any of the bleachers (baseball bleachers also lack safety end rails). The rubberized track, which could serve as an accessible route of travel to the various ball fields, does not allow wheeled vehicles on the track per order of the Millbury School Committee. An exception to this order should be made to accommodate wheelchair access and use.

<u>General Description of Obstacle Which Limits Mobility or Access</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>Cost Estimate</u>
1. No designated accessible parking space, line striping or signage.	Designate one 8' wide accessible passenger vehicle parking space and one 8' wide van accessible parking space, separated by an 8' wide accessible access aisle. Provide related striping and accessible signage.	1	2	\$250
2. The accessible route is compromised due to an 8.8% grade and lack of handrails.	Reconstruct accessible route, if feasible, to maintain maximum 8.3% gradient. Erect accompanying handrails with four feet of clear space between railings. The handrails shall be continuous on both sides of the ramp, 1-1/4" to 1-1/2" in outside diameter, and round or oval in shape; handrails to be provided in pairs, one at a height of 34" - 38" above the ramp surface and the lower handrail at a height between 18" and 20"; handrails to be 1-1/2" from the mounted surface; handrails should extend 12" beyond the bottom of the ramp.	1	3	\$1,500
3. No accessible route of travel to baseball bleachers and dugouts.	Construct a 48" wide w/36" clear width accessible pathway to provide access to bleachers and dugouts.	1	3	\$1,875
4. Lack of railings in bleachers.	Install accessible compliant railings.	1	3	\$1,500
5. Lack of "allowable" accessible route of travel around facility.	Modify school committee policy/ruling to allow wheelchair access and use of track.	1	1	\$0
Total				\$5,125



Elmwood Street Elementary School: Elementary school with two (side and rear) play areas, a baseball field and a softball field. Designated accessible parking is provided at the front of the school building (see building assessment for compliance). No accessible route of travel exists to the two ball fields. The accessible route to the side play area is a switch-back paved walkway with a slope of up to 6.3% and no handrails. The secondary access consists of wooden and earthen stairs which are unstable and unsafe and have no handrails. The rear play area lacks an accessible route and consists of a set of wooden stairs with no handrails to obtain entry into the play area. Both play areas consist of an unstable and non-compliant woodchip base and neither have accessible routes around the play area or to and from play components. Although the play areas appear to have accessible components, both are non-compliant due to the lack of an accessible route to and within the respective play areas. None of the swing sets in the rear or side play areas contain an accessible swing. Furthermore there lacks an accessible route to the swings and a stable, firm and slip-resistant surface below and around the swings.

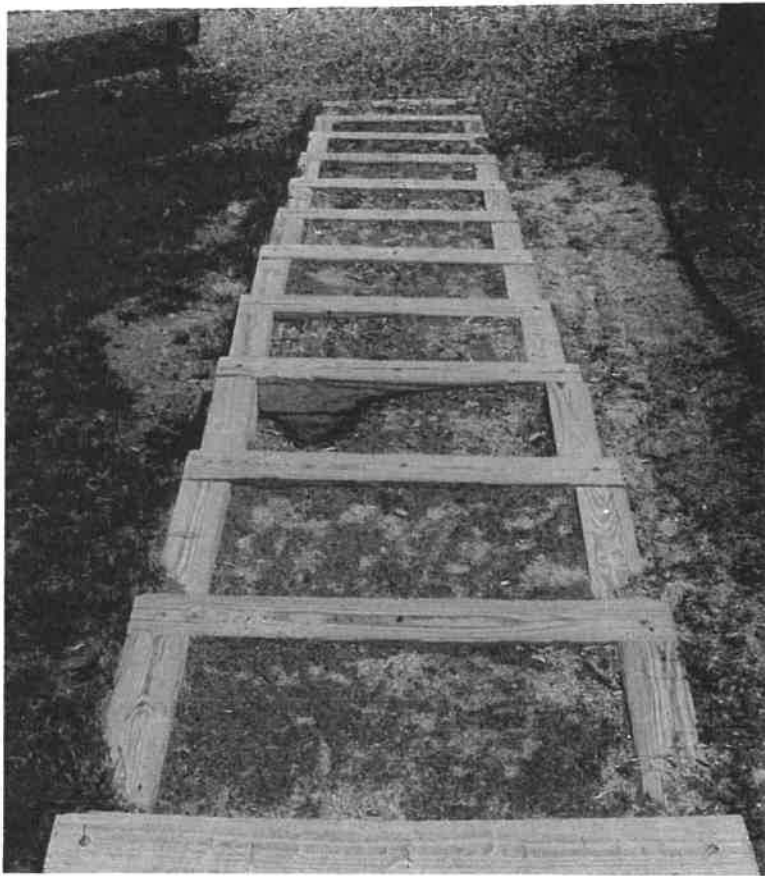
General Description of Obstacle Which Limits Mobility or Access

	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>Cost Estimate</u>
1. The accessible route to the side play area is compromised due to a 6.3% grade and lack of handrails.	Erect accompanying handrails with four feet of clear space between railings. The handrails shall be continuous on both sides of the ramp, 1-1/4" to 1-1/2" in outside diameter, and round or oval in shape; handrails to be provided in pairs, one at a height of 34" - 38" above the ramp surface and the lower handrail at a height between 18" and 20"; handrails to be 1-1/2" from the mounted surface; handrails should extend 12" beyond the bottom of the ramp.	1	3	\$5,400
2. The stairs leading to the side play area do not contain handrails. The existing stairs are unsafe due to an unstable and eroded soil base.	Erect accompanying handrails with at least four feet of clear space between railings. The handrails shall be continuous on both sides of the ramp, 1-1/4" to 1-1/2" in outside diameter, and round or oval in shape; handrails to be provided in pairs, one at a height of 34" - 38" above the ramp surface and the lower handrail at a height between 18" and 20"; handrails to be 1-1/2" from the mounted surface; handrails should extend 12" beyond the bottom of the ramp. Repair steps as necessary.	1	3	\$1,800
				
3. No accessible route of travel exists to the side play area, around the play area or to the various play components, including swing sets.	Construct a 48" wide w/36" clear width accessible pathway to and around the play areas. Install a stable, firm and slip-resistant as well as "impact attenuating" surface around and to play equipment. Acceptable materials include interlocking rubber matting, plastic matting, poured in place rubber surfacing and specially bonded wood fibers.	1	3	\$80,000
4. No accessible swing sets exist in the side play area.	Based on number of swings, add one accessible swing seat. (Note: One seat does exist, but is secured in the building and is only available upon request).	1	2	\$350

Millbury Accessibility Plan

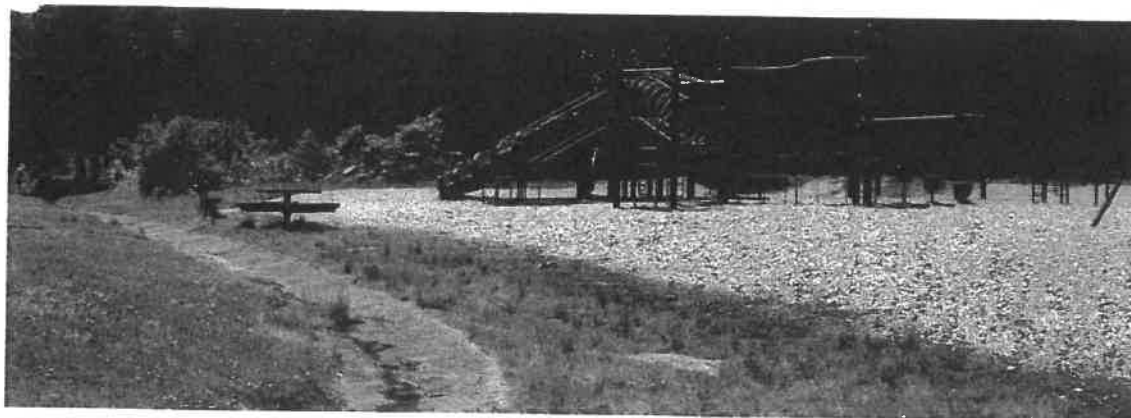
Elmwood Street School continued:

5.	<i>The stairs leading to the rear play area do not contain handrails.</i>	<i>Erect accompanying handrails with at least four feet of clear space between railings. The handrails shall be continuous on both sides of the ramp, 1-1/4" to 1-1/2" in outside diameter, and round or oval in shape; handrails to be provided in pairs, one at a height of 34" - 38" above the ramp surface and the lower handrail at a height between 18" and 20"; handrails to be 1-1/2" from the mounted surface; handrails should extend 12" beyond the bottom of the ramp. .</i>	1	3	\$350
6.	<i>No accessible route of travel exists to the rear play area, around the play area or to the various play components.</i>	<i>Install a stable, firm and slip-resistant as well as "impact attenuating" surface around and to play equipment. Acceptable materials include interlocking rubber matting, plastic matting, poured in place rubber surfacing and specially bonded wood fibers.</i>			\$65,000
7.	<i>No accessible swing sets exist in the rear play area</i>	<i>Based on number of swings, add one accessible swing seat.</i>	1	2	\$350
8.	<i>No accessible route of travel exists to the two baseball fields.</i>	<i>Construct a 48" wide w/36" clear width accessible pathway to and around the ball fields.</i>	1	3	\$18,500
Total					\$171,750



Shaw Middle School: Middle school with one playscape, swing set and related equipment, a baseball field and a soccer field. Designated accessible parking is provided at the front of the school building (see building assessment for compliance) but is not wholly compliant. No accessible route of travel exists to either the playscape or the ball fields. A paved drainage swale further restricts direct access into the playscape. The playscape consists of non-accessible components and an unstable and non-compliant woodchip base. Furthermore, no accessible route of travel exists around the play area or to and from play components. Both a bench and picnic table in this area are also non-compliant. Due to a deteriorated sidewalk, no accessible route of travel exists around the left side of the baseball field. The paved pathway to the soccer field is on a 7.9% to 9.1% gradient and stops short of the actual field.

<u>General Description of Obstacle Which Limits Mobility or Access</u>		<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>Cost Estimate</u>
1.	No passenger vehicle or van accessible signage provided in front of the accessible parking spaces.	Provide accessible signage.	1	2	Included in building assessment.
2.	The accessible route to the soccer field is compromised due to a 7.9 - 9.1 % grade and lack of continuance to the field itself.	Construct a new compliant 48" wide w/36" clear width accessible route of travel to the soccer field.	1	3	\$3,500
3.	The accessible route along the baseball field is non-compliant due to deferred maintenance resulting in an uneven, unstable and deteriorated walkway.	Reclaim and resurface approximately 100 l.f. of sidewalk along baseball field. Install a curb ramp from the parking lot.	1	3	\$2,500
4.	No accessible route of travel exists to the rear playscape, around the play area or to the various play components, including swing sets.	Construct a 48" wide w/36" clear width accessible pathway to and around the play areas. Install a stable, firm and slip-resistant as well as "impact attenuating" surface around and to play equipment. Acceptable materials include interlocking rubber matting, plastic matting, poured in place rubber surfacing and specially bonded wood fibers.	1	3	\$65,000
5.	No accessible swing sets exist in the play area.	Based on number of swings, add one accessible swing seat.	1	2	\$350
6.	The picnic table does not provide the required knee and clear width space.	Replace the picnic table with a fully compliant table which provides a clear space under the table top not less than 30" wide and 19" deep and not less than 27" clearance from the ground to the underside of the table.	1	2	\$450
7.	No companion flat level surface along an accessible route exists next to the bench.	Create a minimum 36" x 60" hard packed or paved flat space for a wheelchair sitting area.			\$100
Total					\$71,900



Greenwood Street Park: Neighborhood playground and park consisting of a baseball field, a soccer field, a basketball court, swings, and 2 spring rider play devices. No designated accessible parking exists in the "upper" parking lot. The "lower" lot has two non-compliant striped accessible spaces. An accessible portable toilet is located in the upper parking lot. No accessible routes of travel exist to the ball fields, play components or basketball court. None of the bleachers have railings. Future playground equipment replacement or expansion should comply with the guidance provided in Attachment H.

<u>General Description of Obstacle Which Limits Mobility or Access</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>Cost Estimate</u>
1. No designated accessible parking space, line striping or signage in the upper parking lot and non-compliant parking due to lack of signage and insufficient access aisle width in the lower parking lot.	In both the upper and lower parking lots, designate one 8' wide accessible passenger vehicle parking space and one 8' wide van accessible parking space, separated by a 8' wide accessible access aisle. Provide related striping and accessible signage.	1	2	\$300
2. No accessible route of travel exists to the ball fields, play components and basketball court.	Construct a 48" wide w/36" clear width accessible pathway to all ball fields, play components and the basketball court	1	3	\$6,800
3. Lack of railings in bleachers.	Install accessible compliant railings.	1	3	\$600
Total				\$7,600



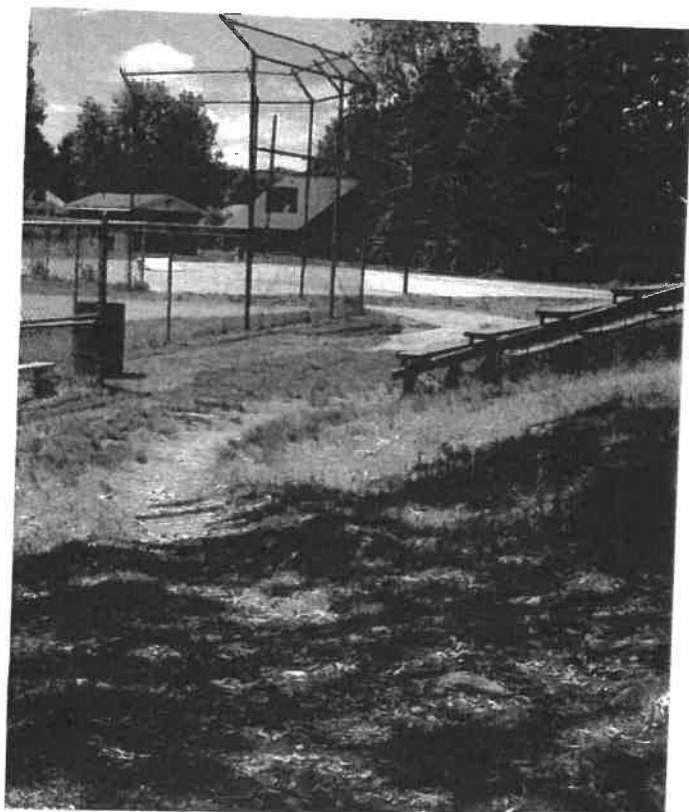
Dorothy Pond Tot Lot: Neighborhood tot lot consisting of a basketball court, swings, slide and open field. No on-site parking exists and no signage or markings to provide an on-street accessible space. Future playground equipment replacement or expansion, if it should occur, should comply with the guidance provided in Attachment H.

<u>General Description of Obstacle Which Limits Mobility or Access</u>		<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>Cost Estimate</u>
1.	No on-street designated accessible parking space, line striping or signage.	Designate on-street accessible space. Provide related striping and accessible signage.	1	2	\$150
2.	No accessible route of travel exists to the play components and basketball court.	Construct a 48" wide w/36" clear width accessible pathway to both play components and the basketball court.	1	3	\$4,500
Total					\$4,650



East Millbury Park: Neighborhood playground and park consisting of 2 baseball fields, 2 basketball courts, swings, slides, a carousel and 2 spring rider play components. The parking area is partially improved, with the parking closest to the entrance being an unimproved and unstable surface. An accessible portable toilet is located on the unimproved parking lot next to the main entry. No accessible routes of travel exist to the ball fields, basketball courts or play components. In fact, in some areas, the existing route of travel between fields and play areas consists of a narrow, worn dirt path with exposed rock and tree roots in the pathway. None of the 3 bleachers have railings. Future playground equipment replacement or expansion should comply with the guidance provided in Attachment H.

<u>General Description of Obstacle Which Limits Mobility or Access</u>		<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>Cost Estimate</u>
1.	No designated accessible parking space, line striping or signage.	Surface an approximately 600 s.f. area to create a firm and level parking area next to the main entry. Designate one 8' wide accessible passenger vehicle parking space and one 8' wide van accessible parking space, separated by a 8' wide accessible access aisle. Provide related striping and accessible signage.	1	2	\$7,500
2.	No accessible route of travel exists to the ball fields, play components and basketball courts.	Construct a 48" wide w/36" clear width accessible pathway to all ball fields, play components and the basketball courts.	1	3	\$20,000
3.	Lack of railings in bleachers.	Install accessible compliant railings.	1	3	\$600
4.	No accessible swing sets exist in the play area.	Based on number of swings, add one accessible swing seat.	1	2	\$350
Total					\$28,450



Windle Field: Town-wide recreational complex consisting of a basketball court, 3 tennis courts, 2 softball fields, a football field and a pavilion containing a concession stand and bathrooms. In addition, 4 bleachers exist and 3 non-accessible picnic tables are located near the concession stand. No designated accessible parking within the 45+ space parking lot is provided. No accessible routes of travel exist in the fields and other recreational facilities. Two separate ramps – one asphalt and one wood – to access the concession area and bathrooms have running slopes ranging from 8% to 11% and therefore exceed allowable threshold levels. The counter at the concession stand is 39 ¼" a.f.f., which exceeds the maximum height limit. This facility also contains two wholly non-compliant bathrooms, a non-compliant bubbler and a non-compliant public telephone.

General Description of Obstacle Which Limits Mobility or Access

Type of Action to be Taken

P F Cost Estimate

1. *No designated accessible parking space, line striping or signage.* *Designate one 8' wide accessible passenger vehicle parking space and one 8' wide van accessible parking space, separated by a 8' wide accessible access aisle. Provide related striping and accessible signage.* 1 2 \$250
2. *No accessible route of travel exists to the ball fields, tennis courts and related facilities.* *Construct a 48" wide w/36" clear width accessible pathway to all playing fields and facilities.* 1 3 \$30,000
3. *Asphalt and wooden "walkways" to the pavilion exceed the maximum running slope requirement of 5.0% for walkways and 8.3% for ramps.* *Remove and reconstruct existing walkways to comply with accessibility requirements. This should include a maximum running slope of 5.0% and cross-slope of 2.0%.* 1 3 \$1,500



4. *Public bathrooms in pavilion are wholly non-compliant including door hardware, signage, dispensers and all toilet fixtures.* *Construct fully compliant men's and women's accessible bathrooms.* 3 4 \$16,000
5. *The counter height at the concession stand is constructed at 39 ¼" a.f.f., which exceeds maximum height requirements by nearly 6".* *Construct a counter below the dispatch window with a maximum height of 34" with a minimum of 27" knee clearance.* 2 3 \$400
6. *Drinking fountain outside public bath rooms protrudes more than 4" into the hallway. Existing fountain does not provide sufficient minimum 27" knee clearance.* *Install new accessible compliant drinking fountain with maximum spout height of 36" a.f.f.. Construct wing or flange wall on side(s) of drinking fountain to minimize protrusion to a maximum of 4".* 4 3 \$2,500
7. *The reach range to highest operable part of the public telephone located in the pavilion area is 50 ½", which exceeds the 48" maximum reach range requirement.* *Lower existing telephone to comply with reach range requirements and still comply with 27" knee clearance requirement. Construct a minimum 30" wide counter (maintaining 27" knee clearance) below the telephone.* 4 3 \$750
8. *Lack of railings in bleachers.* *Install accessible compliant railings.* 1 3 \$800
9. *The picnic tables do not provide the required knee and clear width space.* *Provide at least one picnic table which provides a clear space under the table top not less than 30" wide and 19" deep and not less than 27" clearance from the ground to the underside of the table.* 1 2 \$450

Total \$52,650

Washington Street Park: Town-wide recreational complex consisting of a baseball field, a batting cage, 2 basketball courts, a play area (Woolie World), 6 swings, a carousel, 2 spring rider play components, bleachers, 3 non-accessible picnic tables and a pavilion containing a concession stand and bathrooms. An accessible portable toilet is located in the parking lot, which is located a significant distance from the pavilion. No designated accessible parking spaces are provided. No accessible routes of travel exist to the baseball field, basketball court, pavilion inclusive of concession stand and bathrooms and various play components. Although "Woolie World" does appear to have accessible play components and is minimally accessible from the parking lot – an accessible route around and within the play area does not exist. Future equipment replacement or expansion, if it should occur, should comply with the guidance provided in Attachment H. None of the swing sets contain an accessible swing. None of the bleachers contain railings and none of the picnic tables provide the required knee clearance and clear width space. The counter at the concession stand is 41½" a.f.f. which exceeds the maximum height limit. The facility also contains 2 wholly non-compliant and inaccessible bathrooms.

General Description of Obstacle Which Limits Mobility or Access	Type of Action to be Taken	P	F	Cost Estimate
1. No designated accessible parking space, line striping or signage.	Designate one 8' wide accessible passenger vehicle parking space and one 8' wide van accessible parking space, separated by a 8' wide accessible access aisle. Provide related striping and accessible signage.	1	2	\$250
2. No accessible route of travel exists to the ball fields, basketball courts, play equipment and related facilities.	Construct a 48" wide w/36" clear width accessible pathway to all playing fields and facilities. Direct access into the basketball courts from the parking lot can easily be obtained by removing a portion of asphalt curbing and providing striping.	1	3	\$40,000
3. No accessible route of travel exists around Woolie World or to and within the play facility.	Construct a 48" wide w/36" clear width accessible pathway to and around the play area. Install a stable, firm and slip-resistant as well as "impact attenuating" surface around and to play equipment. Acceptable materials include interlocking rubber matting, plastic matting, poured in place rubber surfacing and specially bonded wood fibers.	1	3	\$80,000
4. Public bathrooms in pavilion are wholly non-compliant including door hardware, signage, dispensers and all toilet fixtures. A 7" abrupt change in level surface exits to access both the men's and women's bathrooms.	Construct fully compliant men's and women's accessible bathrooms with either a ramped or on-grade level approach.	3	4	\$20,000
5. The counter height at the concession stand is constructed at 41 ½" a.f.f., which exceeds maximum height requirements by over 7".	Construct a counter below the dispatch window with a maximum height of 34" with a minimum of 27" knee clearance.	2	3	\$400



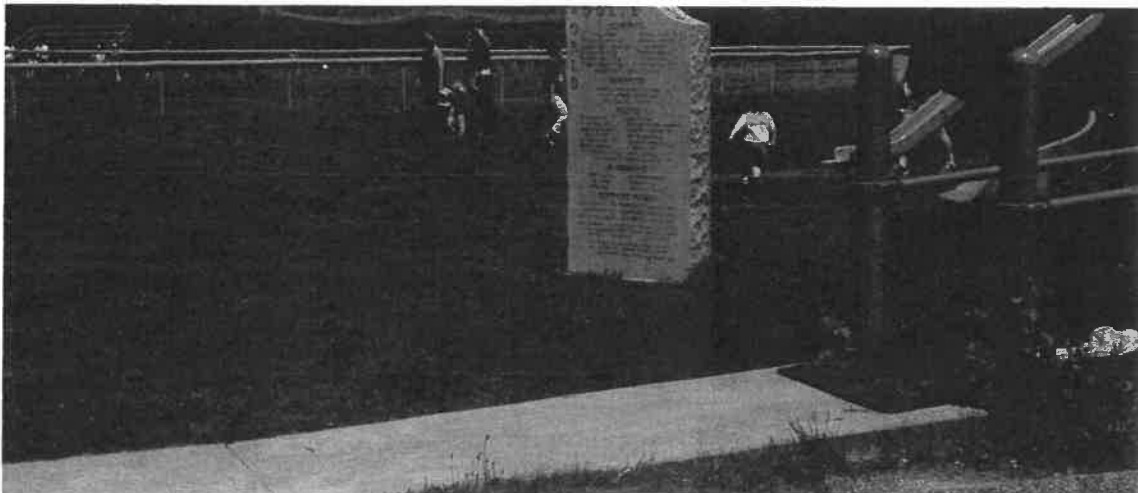
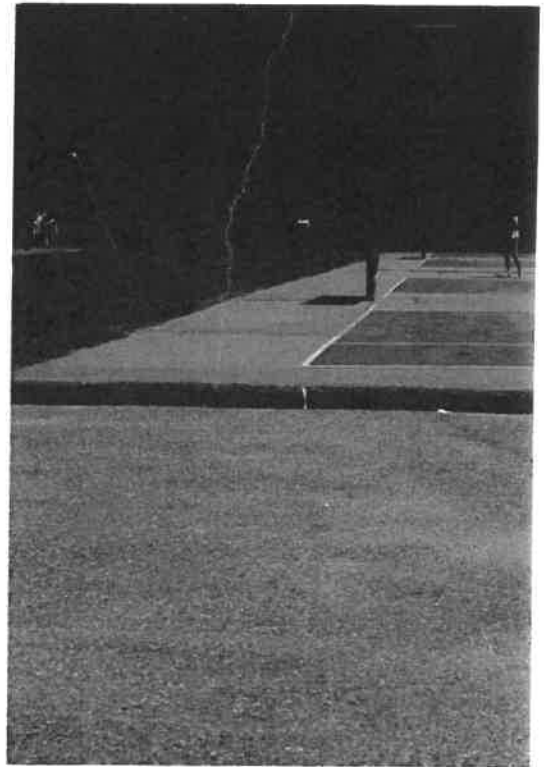
Millbury Accessibility Plan

Washington Street Park continued:

- | | | | | | |
|----|---|---|---|---|-------|
| 6. | No accessible swing sets exist in the play area. | Based on number of swings, add one accessible swing seat. | 1 | 2 | \$350 |
| 7. | Lack of railings in bleachers. | Install accessible compliant railings. | 1 | 3 | \$600 |
| 8. | The picnic tables do not provide the required knee and clear width space. | Provide at least one picnic table which provides a clear space under the table top not less than 30" wide and 19" deep and not less than 27" clearance from the ground to the underside of the table. | 1 | 2 | \$450 |

Total

\$142,050



Jacques Park: A rural "neighborhood" park with minimal improvements and in an overall "poor" condition. The park consists of an overgrown and inaccessible basketball court, a baseball field, 6 swings, 2 bleachers and an accessible portable toilet. The basketball court appears to be abandoned due to the extensive overgrowth and condition of the court. In addition, no formal parking exists adjacent to the basketball court. Should the basketball court be put back into use, it will need to be made compliant by creating an accessible route of travel to this facility. The parking for the baseball field and swings is an unimproved and unstable gravel surface and therefore non-compliant. No signage or striping is provided. The "accessible" portable toilet is located on an unimproved and uneven gravel and grassed surface rendering it non-accessible. No accessible route of travel exists to the ball field, bleachers or swings. Railings are not provided on the bleachers. None of the swings are accessible.

<u>General Description of Obstacle Which Limits Mobility or Access</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>Cost Estimate</u>
1. No designated accessible parking space, line striping or signage.	Surface an approximately 600 s.f. area to create a firm and level parking area next to the main entry. Designate one 8' wide accessible passenger vehicle parking space and one 8' wide van accessible parking space, separated by a 8' wide accessible access aisle. Provide related striping and accessible signage.	1	2	\$7,500
2. No accessible route of travel exists to the ball fields, play components and "accessible" portable toilet.	Construct a 48" wide w/36" clear width accessible pathway to the baseball field, swings and the designated location of the portable toilet.	1	3	\$20,000
3. Lack of railings in bleachers.	Install accessible compliant railings.	1	3	\$400
Total				\$27,900



V. PUBLIC HOUSING

The Millbury Housing Authority manages approximately 189 units of housing in a variety of settings including apartment buildings, single family, duplexes and congregate housing. The following housing programs were used to develop and subsequently govern the use of these units.

Chapter 200-1 Program: Twenty-five "Cape Cod" style single-family detached houses on Memorial Drive. These houses were originally built to house veterans after WWII. Although veterans are given a preference, the units serve as rental housing to lower income families. None of these units are accessible.

Chapter 705 Program: Scattered site housing for families of lower income. This includes single family units on Waters Street, Riverlin Street and North Main Street and two-family units on West Main Street, Forest Drive and Burbank Street. None of these units are accessible.

Chapter 667-C Program: Low income rental housing for the elderly and handicapped. These are located as follows – Linden Apartments (Pearl Street) consisting of four buildings housing 32 units; Centerview Apartments (Elm Street) consisting of one building housing 54 units; and Colonial Drive Apartments (Colonial Drive) consisting of five buildings housing 60 units. Only Centerview Apartments is accessible with 3 units available.

Chapter 667-4 Program: Congregate housing designed to provide affordable housing together with supportive social and health services for independent living. This facility is located on Colonial Drive and consists of one building containing five apartments and 23 bedrooms. This facility has one unit which is accessible with the remaining 4 as "adaptable".

In addition, as part of this report, a general assessment of the privately owned 112-unit Cordis Mills was also undertaken.

Summary of Housing Units (See Appendix I: Housing Data Sheets)

<u>Type</u>	<u>Location</u>	<u>Year Built</u>	<u># of Buildings</u>	<u># of Units</u>
Single-family	256 North Main Street	1938	1	1
Single-family	47 Riverlin Street	1955	1	1
Single-family	7 Waters Street	Est. 1900	1	1
Single-family	Memorial Drive	1950-60	25	25
Two-family	230 West Main Street	1970	1	2
Two-family	21 Forest Drive	1963	1	2
Two-family	9-13 Burbank Street	1985	3	6
Apartment	2 Pearl Street	1960	4	32
Apartment	Colonial Drive	1974	5	60
Apartment	95 Elm Street	1980	1	54
Congregate	10 Colonial Drive	1989	1	5-23 BR
Apartment	Cordis Mills (Canal St.)	1900	1	112

Overview of Applicable Housing Accessibility Requirements

<u>Law</u>	<u>Building Coverage</u>	<u>Units Covered</u>
Fair Housing Act	Multi-family dwellings with at least four attached dwelling units, both for rental and sales, designed and constructed for first occupancy after March 13, 1991, must be designed and constructed to be accessible to and usable by people with disabilities.	In buildings served by elevators, all dwelling units. In buildings not served by elevators, only ground floor dwelling units.
Architectural Barriers Act (1968)	Residential structures constructed by or on behalf of the United States or buildings financed in whole or in part by a grant or loan from the United States and designed after December 22, 1971.	Any residential structure that is intended occupancy by persons w/disabilities or the elderly – 5% of the total or at least one unit in projects of 15 or more units. Applies to alterations. Applies to all elevator residential structures.
MA Architectural Access Board	Group 1 – new construction; rent/hire/lease/sale; 3 or more units/building. Group 2 – new construction & renovations; rental/hire/lease; 12 or more units for common areas; 20 or more units. Group 2b – same as Group 2 plus accessibility features must be installed at time of construction.	Group 1 – minimum adaptability. Group 2 – full adaptability. Group 2b – 5% fully accessible, not adaptable.
S504 of the Rehab. Act (1973)	New federally-assisted multi-family housing projects must be designed and constructed to be accessible to and usable by persons w/disabilities. Also applies to projects w/15 or > units that is altered and the cost of alterations is 75% or more of the replacement cost of the completed facility.	Minimum of 5% of the total dwelling units or at least one unit, whichever is greater, must be made accessible to persons w/mobility impairments; an additional 2% of the units must be made accessible to persons with hearing or vision impairments.
ADA (1991)	The programs, activities and services of public entities must be accessible. Housing itself is not covered, but places of public accommodation, including rental offices and other areas that serve the public are covered. All new construction after January 26, 1993 must be accessible.	Applies to all new construction in places of public accommodations. Does not apply to residential housing, but does apply to housing related services and facilities that serve the public.

Applicability

Of the town's 189 units of public housing, only 4 units (3 one-bedroom apartment units, 1 congregate unit) are accessible. This equates to just 2% of the public housing stock. Furthermore, all of the units are in an apartment setting and limited to the "elderly housing" and congregate housing facilities. None of the town's 38 single-family or duplex housing units are accessible and no other apartment buildings are accessible.

It should be further noted that both 95 Elm Street (elderly housing) and 10 Colonial Drive (congregate housing) did not fully comply with current accessibility standards. Accessible routes of travel to the buildings exceeded running slope thresholds, parking spaces were non-compliant, door entryways (landings and push/pull force) were non-compliant as well as a number of interior individual unit features.

The privately owned Cordis Mills has 6 units (5%) of its 112 total units as accessible and also complies with other basic accessibility requirements. According to the property managers, further adaptations to other units will be made, if feasible, as a reasonable accommodation.

Recommendation

It is highly recommended that the town, through its housing authority, make an attempt to increase and diversify its available accessible housing. It might be prudent to sell one or two of the single-family units (i.e. 256 North Main Street and 7 Waters Street) to generate the required funding to undertake accessibility modifications to other properties. Ideally 3 units should be made accessible at Colonial Drive Apartments as well as one single-family unit (47 Riverlin Street) and one duplex unit at 9-13 Burbank Street. With this action, the town will increase its number of accessible units to 9 (5% of the public housing stock) and will also diversify to 5 different types of housing (elderly, congregate, apartment, single-family and duplex).

Single and two-family	Not subject to state and federal housing accessibility requirements. Based on # of units town-wide, unit layouts and construction, it is <u>recommended</u> that 47 Riverlin Street and one of the units at 9-13 Burbank Street be made accessible/adaptable.
Linden Apartments (Pearl Street)	Based on year of construction, value of building and improvements since construction, further accessibility modifications to housing units is not required unless building value to construction value threshold triggered.
Colonial Apartments (Colonial Dr.)	Based on year of construction, a presumption of 5% unit accessibility should be available. Based on a total of 60 units at this location, this equates to 3 accessible units.
Congregate Housing (Colonial Dr.)	Based on visual observation and discussions with the Millbury Housing Authority, the building common areas and related services are accessible. One congregate unit is accessible and the remaining 4 units are adaptable.
Centerview Apartments (Elm St.)	Based on year of construction, a presumption of 5% unit accessibility should be available. Based on a total of 54 units at this location, this equates to 3, which is the number of accessible units in the building
Cordis Mills (Canal Street)	Based on year of construction, a presumption of 5% unit accessibility should be available. Based on a total of 112 units at this location, this equates to 6, which is the number of accessible units in the facility.

VI. POLICIES AND PROCEDURES

Based upon discussions with local officials, the town does not have formal policies and procedures pertaining to the ADA and program accessibility, employment, non-discrimination, grievances, equal opportunity, and communications. The town does not have a formal personnel policy. The town does have an Affirmative Action Policy that includes a reference to non-discrimination on the basis of disability. No specific reference to the American with Disabilities Act is included in these policies.

A number of model policies and procedures are provided as Appendices to address these areas, which can be adapted more specifically by the town for its own use. The adoption of these policies and procedures may also require specific actions by the town including developing partnerships with other agencies and organizations, employee training, implementation of specific practices, and the purchasing of equipment.

As noted previously, the current Town Manager has gradually begun to revise job descriptions to reflect essential duties and functions as well as minimum physical and mental abilities required to perform the essential job functions. Under the ADA, a person is considered a qualified individual with a disability if s/he can perform essential functions of the job with or without reasonable accommodation. Although the ADA does not require an employer to have job descriptions, they can be used as evidence of the essential functions of the job. Job descriptions should be up-to-date and should differentiate between the essential and the marginal duties of the position, which the Town of Millbury has done. Non-essential functions are those which are not absolutely necessary for the job, although they might be convenient for the employer. If a medical examination is required, it must be required of all entering employees for the same position. Medical examinations are prohibited until after a job offer has been made to an applicant. Employment can be conditioned on the results of the applicant's post-offer medical examination.

<u>Policy/Language</u>	<u>Appendix</u>
Non Discrimination Policy	C
ADA Grievance Procedure	D
Employment/Pre-employment Criteria	E
Equal Opportunity Policy	F
Effective Communication	G

VII. SUMMARY

General

The Millbury Accessibility Plan is a planning document intended to comply with state and federal accessibility regulations. A primary goal of the plan is to provide an evaluation of the town's programs, services, and facilities to determine whether or not they are on the whole accessible to people with disabilities. This includes the identification of physical barriers to public buildings, sites and services owned or operated by the town. Recommendations on how to make services and facilities accessible are provided, as well as a general estimate of cost for the removal of architectural barriers. Sample policies and procedures as required under the Americans with Disabilities Act are also included as part of the overall plan.

Programs and Services

The active participation of the town's ADA Coordinator including monitoring, education, notification, and outreach is critical to the successful implementation of this accessibility plan. This includes assistance in the development of formal departmental practices and procedures to address the needs of the disabled. In order to insure equal access to town services and programs, alternative accessible formats and options must be readily available. It must also be assured that town facilities are regularly maintained to insure accessibility compliance.

Architectural Barriers

The removal of town-wide barriers to access public programs and services can be accomplished through a variety of means ranging from procedural and policy changes to the actual removal of architectural barriers on public property. The total cost of barrier removal is summarized below. However subject to changes in programming and facility use, this cost can be substantially reduced.

<u>Facility Type</u>	<u>Total Estimated Cost</u>
Town Center - Public Buildings and Facilities	Up to \$720,700
Town Center - Streets and Sidewalks	Up to \$354,500
School Buildings	Up to \$596,225
Parks and Recreation Facilities	Up to \$512,075
Total	Up to \$2,183,500

Policies and Procedures

The town does not have formal separate policies and procedures pertaining to the ADA and program accessibility, employment, non-discrimination, grievances, equal opportunity, and communications. There are references and inclusions within the town's Affirmative Action Policy Statement pertaining to non-discrimination on the basis of a handicap. As part of this Accessibility Plan, model policies and procedures are provided to address those "missing" areas, which can be adapted more specifically by the town for its own use. The adoption of these policies and procedures may also require specific actions by the town including developing partnerships with other agencies and organizations, employee training, implementation of specific practices, and the purchasing of equipment.

Recommendations

- Formally appoint an ADA Coordinator as specified under 28 CFR 35.107 (a).
- Develop and adopt formal grievance procedures for the resolution of accessibility related complaints concerning employment, services, programs, and activities (See Appendix D).
- Continue to revise and replace existing job descriptions for town employees with job descriptions which clearly describe the essential functions of each position as well as any necessary physical requirements.
- Adopt policies pertaining to non-discrimination, employment, equal opportunity, and effective communication (See Appendices C, E, F, and G).
- Formalize any "informal practices" pertaining to providing assistance or access to programs and services. This should include postings and the publication of the same in a written format. As a matter of practice, the town's ADA related procedures and policies should be published in the Town Annual Report and on the Town's website.
- Purchase and install a teletypewriter (TTY) or telecommunication device for the deaf (TDD) for use in the selectmen's office to allow a centralized communication point to town services (Estimated cost of \$350).
- Purchase and install an assistive listening device (ASD) or a personal amplifier system to enable those with aural limitations to more effectively participate in public meetings (Estimated cost of \$2,500).
- Undertake required changes in policies and procedures as well as structural modifications to insure that all public elections and all public meetings, including town meetings, are in full compliance with equal and full access requirements.
- Remove architectural barriers as identified in Section IV of this Accessibility Plan.
- Diversify and expand the type and number of accessible public housing units in the community. Ideally 3 units should be made accessible at Colonial Drive Apartments as well as one single-family unit (47 Riverlin Street) and one duplex unit at 9-13 Burbank Street. With this action, the town will increase its number of accessible units to 9 (5% of the public housing stock) and will also diversify to 5 different types of housing (elderly, congregate, apartment, single-family and duplex).

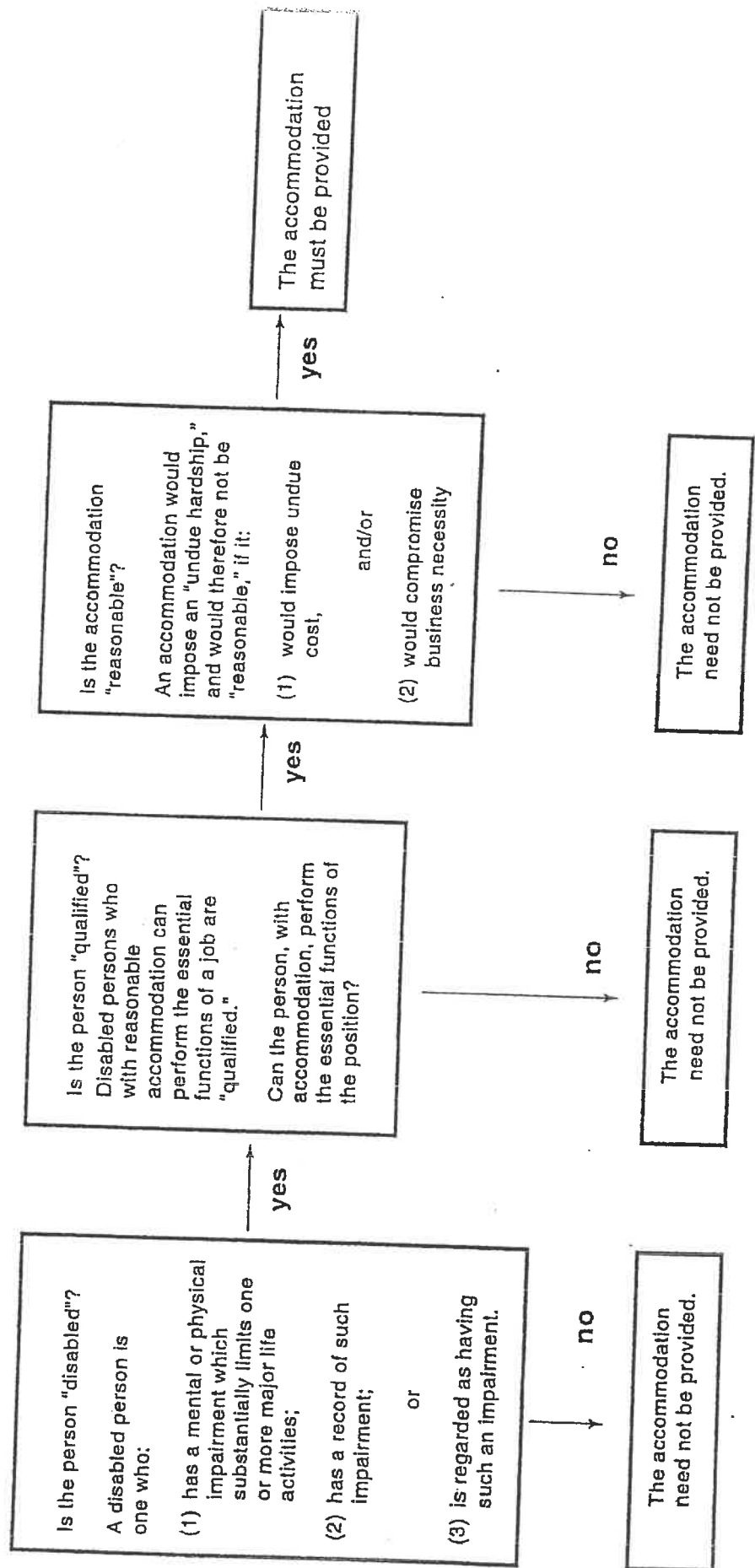
APPENDICES

Appendix A:	Accommodations Decision Chart
Appendix B:	Self-evaluation Memo and Survey Form
Appendix C:	Non Discrimination Policy
Appendix D:	ADA Grievance Procedure
Appendix E:	Employment/Pre-employment Criteria
Appendix F:	Equal Opportunity Policy
Appendix G:	Effective Communication
Appendix H:	U.S.A.B. Accessibility Guidelines for Recreational Facilities and Play Areas
Appendix I:	Housing Data Summary Sheets

Appendix A: Accommodations Decision Chart

Accommodations Decisions Chart

If a request for accommodation is made, the following chart can assist the employer in the decision-making process regarding provision of the accommodation.



Appendix B: Self-evaluation Memo and Survey Form

MEMO

To: Millbury Town Departments/Commissions/Boards

**From James M. Mazik, AICP
Consulting Services**

Date: December 30, 2005

Reference: Millbury Self-evaluation and Transition Plan

The Town of Millbury, at its 2005 Annual Town Meeting, appropriated funding to complete a self-evaluation and transition plan in compliance with the Americans with Disabilities Act (ADA). The Commission on Disabilities and Town Manager initiated a competitive procurement process in late summer to select a qualified consultant to undertake this effort. As a result of this procurement, my firm was selected to proceed on this very important project.

The ADA was enacted in 1990 as a civil rights law that prohibits the exclusion of people with disabilities from the right of equal opportunity. Title II of the ADA mandates each local government to conduct a self-evaluation of its operations and develop a transition plan which identifies physical barriers to accessibility.

It is also a requirement of certain state and federal funding programs that a self-evaluation and transition plan be completed in order to be eligible to apply for grant funds. The town may be considering submitting grant applications in the near future to address accessibility needs for some its public facilities. The completion of this self-evaluation and transition plan will allow the town to secure such funding.

What is a self-evaluation?

A self-evaluation is an evaluation of municipal operations to determine whether or not they are "on the whole" accessible to people with disabilities. The four areas of self-evaluation are sites, services and programs, general communications, and employment practices.

What is a transition plan?

Public entities are also required to develop a transition plan in order to; (1) identify barriers to accessibility, (2) create a list of potential modifications, and (3) develop a timeline for removing the identified architectural barriers.

YOUR COOPERATION IS NEEDED !!!!!

Self-evaluation Survey Form

Each department or municipal provider of a service will be asked to complete the attached survey form. It will take only a few minutes to complete. Please return your completed survey form to the Town Manager's Office by Thursday, January 19, 2006. After I review the surveys, I will be contacting you directly to clarify some of your responses and to ask a few additional questions.

Transition Plan

As part of this process, I will also need to physically inspect and assess all public facilities in Millbury. If you have jurisdiction over a certain building, I will be contacting you directly within the next few weeks or months to arrange for a convenient time for me to undertake this assessment.

Again your cooperation is greatly appreciated and I look forward to working with each of you. If you have questions, please contact me at (413) 265-9454 (cell #) or e-mail me at jmazik14@comcast.net.

Jim Mazik

Millbury Self-evaluation Survey

Department/Board/Commission: _____

1. Location of department/program (name of building, floor level, street address:

2. Describe the function of the department and any programs it offers or services that it provides.

- Are there any circumstances in which the participation of a person with a disability in any program or service offered by your department would be restricted or excluded?
-

- Are any of these exclusions or restrictions necessary to the operation of the program/department or to the safety of non-disabled persons?

- Are staff aware it may be necessary to modify program policies or practices to enable people with disabilities to participate in and benefit from the programs?

- Is the public informed that these programs/services are prepared to make reasonable modifications?

- Does the department/program have a formal or informal process for responding to requests for modifications?

- Briefly describe general office/service communications. Specifically, how is information disseminated and communicated? Are there assistive devices or auxiliary aids (ie. TTY, TDD, sign language interpreter) which are used or available?
- Are there any circumstances in which a person with a disability would be asked to pay a fee or meet any other requirements not imposed on other program/service participants? If yes, describe.
- Does the program/service provide any separate activities for people with disabilities? If yes, describe.
- Are there any circumstances in which a person with a disability would be prohibited from participating in regular activities because of the provision of separate activities?

3. Employment Practices.

- Please list the number of full- and part-time employees.
- Has any of these staff declared a disability? If yes, describe.
- Are there any required formal tests as a condition of employment? If yes, describe.
- Do any of the positions have formal job descriptions? If so, state which position and attach a copy of the job description as well as a sample job ad.

Appendix C: Non Discrimination Policy

Non Discrimination Policy

The Town of Millbury does not discriminate on the basis of disability. Program applicants, participants, members of the general public, employees, job applicants, and others who are entitled to have access to all town programs, activities, and services will not be discriminated against on the basis of disability.

Copies of this notice as well as other policies and procedures may be available, upon request, in standard or alternate print formats to include large print, audio tape, Braille, and computer disk. The town's grievance procedures, self-evaluation, transition plan and ADA policies, practices, and procedures, are readily available, upon request.

Appendix D: ADA Grievance Procedure

Town of Millbury Grievance Procedure

The following grievance procedure is established to meet the requirements of the Americans with Disabilities Act. It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in employment practices and policies or the provision of services, activities, programs and benefits by the Town of Millbury.

The complaint should be in writing and contain information about the alleged discrimination such as name, address, telephone number of complainant and location, date and description of the problem. Reasonable accommodations, such as personal interviews or a tape recording of the complainant, will be made available for persons with disabilities who are unable to submit a written complaint.

The complaint should be submitted by the grievant and/or his/her designee as soon as possible but no later than 60 calendar days after the alleged violation to the Millbury ADA Coordinator, Municipal Office Building – 127 Elm Street, Millbury, MA 01527.

Within fifteen calendar after receipt of the complaint, the ADA Coordinator will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, the ADA Coordinator will respond in writing, and where appropriate in a format accessible to the complainant such as audiotape. The response will explain the position of the Town of Millbury and offer options for substantive resolution of the complaint.

If the response by the ADA Coordinator does not satisfactorily resolve the issue, the complainant and/or his/her designee may appeal the decision of the ADA Coordinator within 15 days after receipt of the response to the Board of Selectmen or their designee.

Within 15 calendar days after receipt of the appeal, the Millbury Board of Selectmen or their designee will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting the Board of Selectmen or their designee will respond in writing, and where appropriate in a format accessible to the complainant such as audiotape, with a final resolution of the complaint.

All complaints received by the ADA Coordinator, appeals to the Millbury Board of Selectmen or their designee and responses from the ADA Coordinator and the Millbury Board of Selectmen or their designee will be kept by the Town of Millbury for at least three years.

Appendix E: Employment/Pre-employment Criteria

Employment/Pre-employment Criteria

Reasonable Accommodation Policy

The town of Millbury strives to make employment opportunities and programs available to people from every race, color, religion, sex, national origin, age, handicap, or veteran status and does not discriminate against any person based on these "categories". The town is committed to supporting people of various needs and abilities and will make every effort to provide a healthy, caring environment for all staff and the public.

It is the policy of the town of Millbury that no otherwise qualified individual with a disability shall be excluded from employment solely by reason of her/his disability.

It is understood that the obligation to comply with this policy is not decreased by any state or local law or other requirement that, based on disability, imposes inconsistent or contradictory prohibition. Any prohibitions or limits upon the eligibility of qualified individuals with disabilities to practice any occupation or profession are not allowed under this policy.

It is the policy of the town that reasonable accommodations will be made for any qualified applicant or employee unless the town can demonstrate that the accommodation imposes an undue financial or administrative hardship on the operation of the town.

Notice of availability of reasonable accommodations for job applicants will be included in postings and advertisements and will be made available upon request to applicants with disabilities during the pre-employment process if necessary to provide equal opportunity to secure employment with the town of Millbury.

All prospective employees will be informed at the initial interview that the town of Millbury does not discriminate on the basis of disability and that requests for reasonable accommodations needed for the performance of essential job functions or for the enjoyment of other benefits of employment should be made by prospective employees following receipt of a conditional offer of employment.

Persons with a disability employed by the town of Millbury may request reasonable accommodations from their immediate supervisor or from the town's ADA Coordinator. Requests for accommodations can be made at any time as they become necessary to perform essential job functions, or utilize benefits enjoyed by employment. These requests must be made both verbally and in writing describing the nature and purpose of the requested accommodation. Assistance will be made available upon request to any individual who needs assistance in identifying or documenting the reasonable accommodation needed.

A decision regarding reasonable accommodation requests will be made within thirty (30) working days of the submission of the request. The effectiveness of the accommodation and need for modification will be assessed during the first month of use.

The final decision concerning any requested accommodation that may represent an undue financial or administrative hardship will be made by the ADA Coordinator. Applicants or employees have the right to appeal the denial of any accommodation request using the ADA Grievance Procedure. In the case of a denial on undue hardship by the ADA Coordinator, the employee or applicant may appeal in writing within thirty (30) working days to the Board of Selectmen.

Employment Testing and Pre-employment Inquiry

The town of Millbury shall not use any employment test or other selection criteria that screens out or tends to screen out individuals with disabilities.

The town shall not make any pre-employment inquiries or conduct a pre-employment medical examination of an applicant to determine whether the applicant is an individual with a disability or the nature or severity of the disability.

The town will ask no questions of applicants, before employment related to physical or mental impairment and no such questions shall appear on any written application form it may use. No medical examination shall be required for prospective employees unless it is a bonafide necessity for the position in question. No medical examination shall be required before a conditional offer of employment has been made. All pertinent medical information obtained in such instances shall be considered as confidential and shall be available only to supervisory personnel and certain others who have a legitimate need for the information. A written record of anyone inspecting the medical information in a personnel file will be maintained.

The town may make pre-employment inquiries to determine an applicants ability to perform job-related functions.

All job selection criteria and/or tests that may be utilized will be examined to ensure that they reflect only bonafide job related qualifications and do not tend to screen out otherwise qualified persons with disabilities. In making such determinations the input and assistance of persons with disabilities may be sought and engaged.

Employment Training Assistance

It is the policy of the town of Millbury that staff training and development activities provided will include information about the ADA employment requirements. All employees and volunteers will receive a briefing on the ADA and the town's ADA policies and procedures.

Appendix F: Equal Opportunity Policy

Equal Opportunity Policy

General Policy Statement

It is the policy of the town of Millbury to ensure that persons with disabilities are provided maximum opportunity to participate in and benefit from programs, services, and activities offered by the town. It is the town's goal that such participation as equal as possible to that of able-bodied persons. Therefore, the town's primary focus will be architectural modifications, assistive listening devices and equipment, and sign language interpreters upon request and availability. This approach may not always be feasible or sufficient to ensure equal access and benefit.

In providing its services, programs, and activities the town of Millbury shall not:

- Deny a qualified individual with a disability the opportunity to participate in or benefit from a benefit, service, or activity.
- Afford a qualified individual with a disability the opportunity to participate in or benefit from any aid, benefit, or service that is not equal to that offered to others.
- Deny a qualified individual with a disability the opportunity to participate as a member of planning or advisory boards, commissions, or any other entity of the town of Millbury.
- Limit a qualified individual with a disability the enjoyment of any right, privilege, advantage, or opportunity received by other individuals receiving the aid, benefit, or service.

It is the policy of the town of Millbury to ensure that persons with disabilities are provided maximum opportunity to participate in and benefit from programs, services, and activities. It is the goal that such participation is in the same manner as that of non-disabled persons. Toward achieving this, the town has a primary focus to identify barriers to access and remove or modify them to use assistive devices or procedures when necessary.

Reasonable Modifications Policy

The town of Millbury shall make a reasonable program or service modification whenever a person requests such an accommodation, unless it can be demonstrated by the town that such an accommodation would impose an undue burden or fundamental alteration to the program or service. Final decisions regarding requests for reasonable modifications will be made by the ADA Coordinator in a timely manner. These modifications shall be made within thirty (30) working days of the request or as soon as is reasonably possible. Individuals seeking to contest a denial of a request for reasonable modifications will be given a copy of the grievance procedure in the format appropriate for their needs.

The town will comply with all applicable Federal and State laws and regulations relative to the use of assistive equipment, including trained assistance animals. In addition, no arbitrary restrictions or limitations will be placed on the type or number of assistive equipment items, including assistive animals, that people with disabilities may bring with them to town facilities.

Eligibility Requirements

Any prohibitions or limits upon the eligibility of qualified individuals with disabilities to receive services or practice any occupation or profession are not allowed under this policy.

Assurance Regarding Surcharges

It is the policy of the town of Millbury that surcharges are never charged to participants (nor any other interested party or person) for reasonable accommodations under any circumstances. Such accommodations include, but are not limited to: American Sign Language (ASL) interpreters, Computer Aided Real Time (CART) translators, architectural accessibility, computer accessibility hardware or software, Braille material, listening devices, closed captioning, etc.

Integrated Services Assurance

The town of Millbury strives to ensure that all of its services, programs, and activities are provided in the most integrated setting possible. People with disabilities will not be required to participate in separate programs even if separate programs that are specifically designed to meet the need of persons with disabilities are offered.

Services will not be provided to any person with a disability in a manner or at a location different from that available to other service recipients unless the potential for removal of architectural barriers or the use of assistive devices and equipment have been found to be inadequate or inappropriate to the needs of the individual. In all cases, the affected individual will be fully involved in the consideration and decision-making process.

Significant Assistance Assurance

It is the policy of the town of Millbury that programs to whom the town provides significant support or who the town sponsors may not discriminate against people with disabilities.

Accessible Transportation Policy

It is the policy of the town that whenever transportation services are provided they will be accessible to participants in town programs regardless of disability. When transportation services are provided and an individual is in need of accessible transportation they should make their request in writing to the ADA Coordinator. Requests must be made at least five (5) days in advance of the need. As with all of the town's transportation services, all requests are subject to the availability of space. When a request can not be met, notice will be given as soon as possible and at least one (1) day before the requested date of service.

If a person needs a wheelchair van every effort will be made to accommodate this need. If the town is providing transportation for anyone to or from a particular event or service and someone requests wheelchair accessible transportation, then the town will be responsible for the arrangement and the cost of that transportation.

Community Referral Assurance

Whenever the town of Millbury participates in or funds programs or makes references to other programs or services, it is the policy that such programs and services must be accessible or usable by a person with a disability. The town will gather information regarding which of the programs or services that it refers people to are accessible, and those that are not. The town will make efforts to gather at least one accessible provider in each of the categories of service in which the town makes referrals.

Interpreter Services Policy

It is the policy of the town of Millbury that sign language interpreters, assistive listening devices, readers, or scribes will be provided upon request to ensure equally effective communication. Requests should be made at least fourteen (14) days prior to the event, service, program or meeting. Every reasonable effort will be made to meet the request. When an ASL interpreter is needed, the town will make every effort to provide one.

A request to the ADA Coordinator for interpreter services should be made fourteen (14) days in advance of the event or activity whenever possible. Every attempt will be made to meet the request. The service will be provided at no charge to the person needing the accommodation. If the request can not be met, an alternative effective format will be offered. The person making the request will be informed as soon as possible but at least five (5) days in advance of the event or activity.

Assistive Listening Device Assurance

The town of Millbury shall provide or obtain assistive listening devices when requested for either group or individual settings. This may be accomplished by using an available assistive equipment loan program. This may include amplified phone handsets and TV decoders or amplifiers etc.

Training Assurance

It is the policy of the town of Millbury that staff training and other staff development activities provided will include training on the use of a TTY/TDD if provided, the operator relay service, and other equipment necessary to ensure effective communication. Staff will receive training in procedures and policies on receiving and handling requests for auxiliary aids and services and for ensuring that primary consideration is given to the type of service or format preferred by the person with a disability. Training on effective communication is given during orientation and at a yearly staff refresher training.

**Appendix H: U.S.A.B. Accessibility Guidelines for
Recreational Facilities and Play Areas**

Appendix G: Effective Communication

Effective Communication

Effective Communication

It is the policy of the town of Millbury that auxiliary aids and services will be provided when necessary to ensure effective communication with persons whose disabilities effect communication. Persons with communications disabilities will be given the opportunity to request the aid or service that they prefer and the requested aid or service will be given primary consideration by the town unless doing so would impose an undue burden or unless a fully effective alternative is available.

The town is making efforts to ensure that emergency alarm devices in all public areas are both visual and auditory. Emergency evacuation procedures have been developed for each facility which includes evacuation of people with disabilities. The individual responsible for coordinating training for emergency evacuation for each facility has been designated. Information on emergency evacuation procedures will be provided to people verbally, in written format, or in alternate format forms as needed.

TTY/TDD Assurance

It is recommended that a TTY/TDD be purchased and installed at the Office of the Board of Selectmen for use by all Town Hall general government services. The town shall also be familiar with the New England Telephone VOICE/TTY Relay Service System at 800-439-2370. All telephone receptionists and primary staff will be trained on the use of the TTY. All publications of telephone numbers for town offices, employees, or services shall also list the TTY number or the relay system number as being available.

Alternative Format Policy and Procedure

It is the policy of the town of Millbury to make all documents, publications, and materials used in town business available to all persons who require them in alternate formats. Procedures have been established for the provision of alternate formats to include large prints, audiotape, Braille, and computer diskettes.

Large print, short audio tapes and computer diskette formats will be prepared by town employees who have been identified by the ADA Coordinator and trained in the necessary skills and procedures.

A request to the ADA Coordinator for alternative format documents should be made fourteen (14) days in advance of the event or activity whenever possible. If materials in Braille are being requested then the request must be made thirty (30) days in advance of the event. Every attempt will be made to meet the request. The materials will be provided at no charge. If the request can not be met, an alternative effective format will be offered. The person making the request will be informed as soon as possible but at least five (5) days in advance of the event or activity.

Materials describing the town services, programs, or upcoming events will be available in alternative formats such as large print or audio format. All materials will include the words "ASL interpreters upon request and availability".



UNITED STATES ACCESS BOARD

amusement rides boating facilities fishing piers & platforms golf courses miniature golf sports facilities swimming pools & spas

accessible sports facilities



a summary of
accessibility guidelines
for recreation facilities

JUNE 2003

A FEDERAL AGENCY COMMITTED TO ACCESSIBLE DESIGN

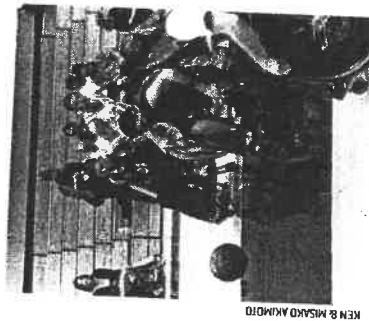
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This information has been developed and reviewed in accordance with the Access Board's information quality guidelines (www.access-board.gov/infoquality.htm).

Cover photo, center: Soot Goodman

Accessibility Guidelines for Recreation Facilities



KEN & MISAOK AKIMOTO

Introduction

The Americans with Disabilities Act (ADA) is a comprehensive civil rights law that prohibits discrimination on the basis of disability. The ADA requires that newly constructed and altered state and local government facilities, places of public accommodation, and commercial facilities be readily accessible to, and usable by, individuals with disabilities. The ADA Accessibility Guidelines (ADAAG) is the standard applied to buildings and facilities. Recreational facilities, including sports facilities, are among the facilities required to comply with the ADA.

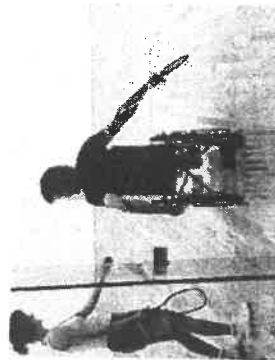
The Access Board issued accessibility guidelines for newly constructed and altered recreation facilities in 2002. The recreation facility guidelines are a supplement to ADAAG. As a supplement, they must be used in conjunction with ADAAG. References to ADAAG are mentioned throughout this summary. Copies of ADAAG and the recreation facility accessibility guidelines can be obtained through the Board's website at www.access-board.gov or by calling 1-800-872-2253 or 1-800-993-2822 (TTY). Once these guidelines are adopted by the Department of Justice (DOJ), all newly designed, constructed and altered recreation facilities covered by the ADA will be required to comply.

The recreation facility guidelines cover the following facilities and elements:

- Amusement rides
- Boating facilities
- Fishing piers and platforms
- Miniature golf courses
- Golf courses
- Exercise equipment
- Bowling lanes
- Shooting facilities
- Swimming pools, wading pools, and spas

This guide is intended to help designers and operators in using the accessibility guidelines for sports facilities. These guidelines establish minimum accessibility requirements for newly designed or newly constructed and altered sports facilities. This guide is not a collection of sports facility designs. Rather, it provides specifications for elements within a sports facility to create a general level of usability for individuals with disabilities. Emphasis is placed on ensuring that individuals with disabilities are generally able to access the sports facility and use a variety of elements. Designers and operators are encouraged to exceed the guidelines where possible to provide increased accessibility and opportunities. Incorporating accessibility into the design of a sports facility should begin early in the planning process with careful consideration of accessible routes.

The recreation facility guidelines were developed with significant public participation. In 1993, the Access Board established an advisory committee of 27 members to recommend accessibility guidelines for recreation facilities. The Recreation Access Advisory Committee represented the following groups and associations:



- American Ski Federation
- American Society for Testing and Materials (Public Playground Safety Committee)
- American Society of Landscape Architects
- Beneficial Designs
- City and County of San Francisco, California, Department of Public Works
- Disabled American Veterans
- Environmental Access
- Golf Course Superintendents Association of America
- Hawaii Disability and Communication Access Board
- International Association of Amusement Parks and Attractions
- Katherine McGuinness and Associates
- Lehman, Smith, and Wiseman Associates
- Michigan Department of Natural Resources
- National Council on Independent Living
- National Park Service
- National Recreation and Park Association
- New Jersey Department of Community Affairs
- Outdoor Amusement Business Association
- Paralyzed Veterans of America
- Professional Golfer's Association
- Self Help for Hard of Hearing People
- States Organization for Boating Access
- Universal Studios
- U.S. Army Corps of Engineers
- U.S. Forest Service
- Y.M.C.A. of the U.S.A.
- Walt Disney Imagineering



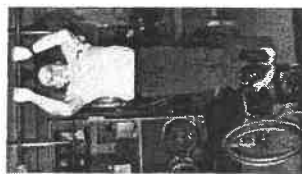
The public was given an opportunity to comment on the recommended accessibility guidelines, and the Access Board made changes to the recommended guidelines based on the public comments. A notice of proposed rulemaking (NPRM) was published in the Federal Register in July 1999, followed by a five-month public comment period. Further input from the public was sought in July 2000 when the Access Board published a draft final rule soliciting comment. A final rule was published in September 2002.

"Whenever a door is closed to anyone because of a disability, we must work to open it.... Whenever any barrier stands between you and the full rights and dignity of citizenship, we must work to remove it, in the name of simple decency and justice. The promise of the ADA...has enabled people with disabilities to enjoy much greater access to a wide range of affordable travel, recreational opportunities and life-enriching services."

President George W. Bush, New Freedom Initiative, February 1, 2001

Sports Facilities

The recreation facility guidelines described in this guide focus on the accessible features of unique sports-related elements in newly designed or newly constructed and altered facilities. Other provisions contained in ADAAG address elements commonly found within a sports facility, such as accessible vehicle parking spaces, exterior accessible routes, doors, assembly sections, and toilet and bathing facilities. ADAAG addresses only the built environment (structures and grounds). The guidelines do not address operational issues. Questions regarding operational issues should be directed to the Department of Justice, 1-800-514-0301 or 1-800-514-0383 (TTY).

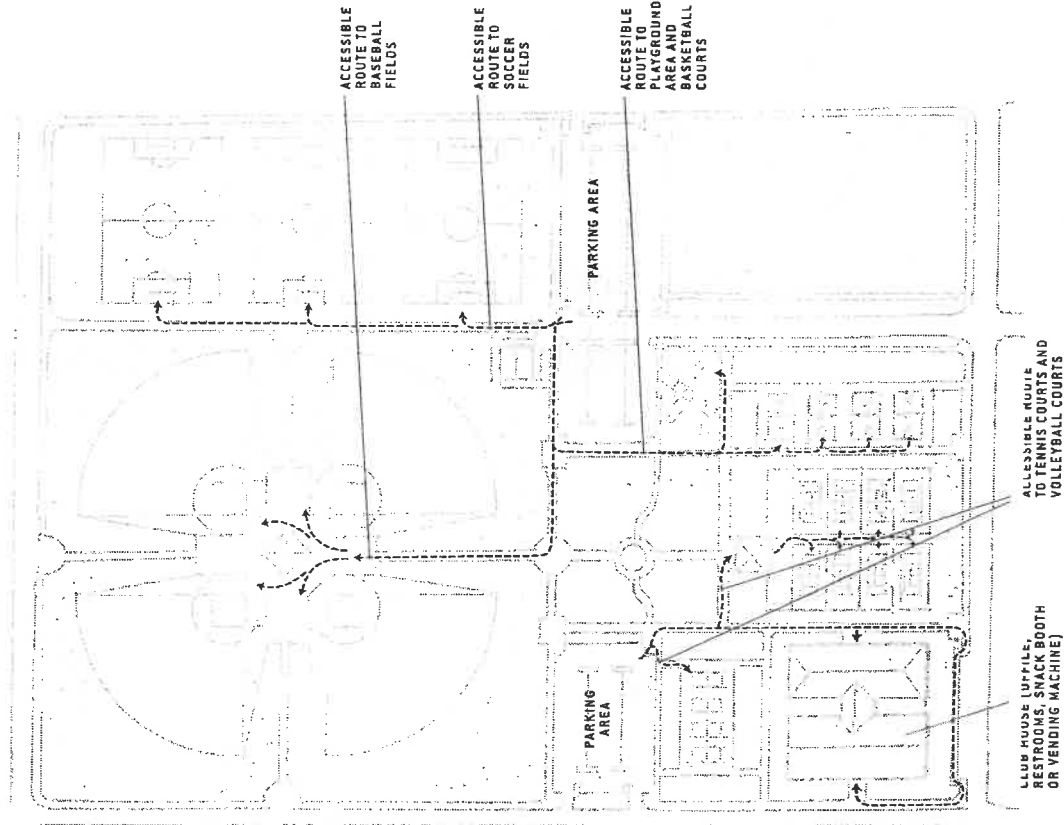


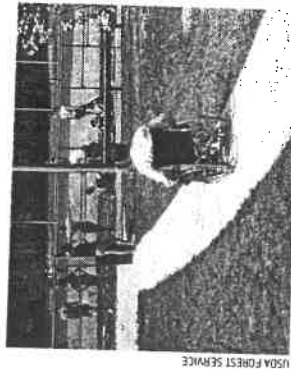
CURT BEAMER

Facilities and elements covered include:

- Areas of indoor and outdoor sports activity, including court sports (such as tennis, volleyball and racquetball), sports fields (such as softball, football, lacrosse, baseball, and soccer) and other sports (such as gymnastics and wrestling)
- Dressing, fitting, and locker rooms
- Team or player seating areas
- Exercise equipment and machines

ACCESSIBLE ROUTE CONNECTING VARIOUS ELEMENTS OF A MULTI-USE FACILITY





ACCESSIBLE ROUTE CONNECTING TO
A SPORTS FIELD

- Saunas and steam rooms
 - Animal containment areas for public use such as petting zoos and passageways along animal pens at fairs
 - Bowling lanes
 - Shooting facilities
- These recreation facility guidelines do not apply to:
- Raised structures used for refereeing, judging, or scoring a sport
 - Animal containment areas not for public use
 - Raised boxing rings and wrestling rings
 - Water slides (as long as an accessible route is provided to the base)

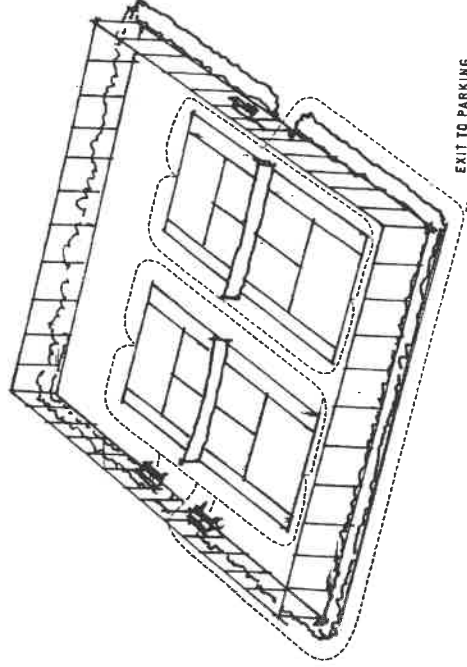
Accessible Routes

Accessible routes are continuous, unobstructed paths connecting all accessible elements and spaces of a building or facility. The accessible route must comply with ADAAG provisions for the location, width (minimum of 36 inches), passing space, head room, surface, slope (maximum of 1:12 or 8.33%), changes in level, doors, egress, and areas of rescue assistance, unless otherwise modified by specific provisions outlined in this guide. Facilities must provide accessible routes connecting all accessible elements and spaces within areas of indoor or outdoor sports activities. If not all elements need to be accessible, only those that are accessible must be connected with an accessible route.

The guidelines apply to "fixed" facilities and elements. They do not cover equipment that is frequently moved. For example, a wrestling mat or badminton net may be portable and moved regularly.

Court Sports

Where courts are provided, an accessible route must connect each court. Accessible routes must comply with all ADAAG requirements, such as width and changes in level or surface, and must *directly* connect both sides of the court. Players must not be required to traverse through another court to get to the other side of their court. This is especially critical in sports like tennis, in which changing sides of the court is part of the game. No additional accessibility guidelines apply once on the court.



ACCESSIBLE ROUTE CONNECTING COURT SPORTS

Areas of Sport Activities

An "area of sport activity" is a broad term intended to cover a diverse number of indoor and outdoor sports fields and areas. This includes, but is not limited to: basketball courts, baseball fields, running tracks, soccer fields, and skating rinks.

The "area of sport activity" is "that portion of a room or space where the play or practice of a sport occurs." For example, football fields are defined by boundary lines. In addition, a safety border is provided around the field. Players may temporarily be in the space between the boundary lines and the safety border when they are pushed out of bounds or momentum carries them forward when receiving a pass. So in football, that space is used as part of the game and is included in the area of sport activity.

Accessible routes must connect each area of sport activity. Areas of sport activities must comply with all ADAAG requirements, except that they are exempt from the requirement that surfaces must be stable, firm, and slip resistant, and from the restrictions on carpets, grating, and changes in level. They are also exempt from restrictions on protruding objects. These provisions are not required inside of the area of sport activity since they may affect the fundamental nature of the sport or activity. For example, an accessible route is required to connect to the boundary of a soccer field, but there is no requirement to change the surface of a field to an accessible surface.

Where light fixtures or gates are provided as part of a court sport or other area of sport activity, they must comply with ADAAG provisions for controls and operating mechanisms, and for gates and doors.

Animal Containment Areas

If the public has access to an animal containment area, accessible routes must connect to each animal containment area. Examples may include petting zoos, petting farms, public pathways for viewing livestock display tents, or other areas where the public has access to animals. These areas must comply with all ADAAG requirements, except the requirements that surfaces be stable, firm, and slip resistant and the restrictions on

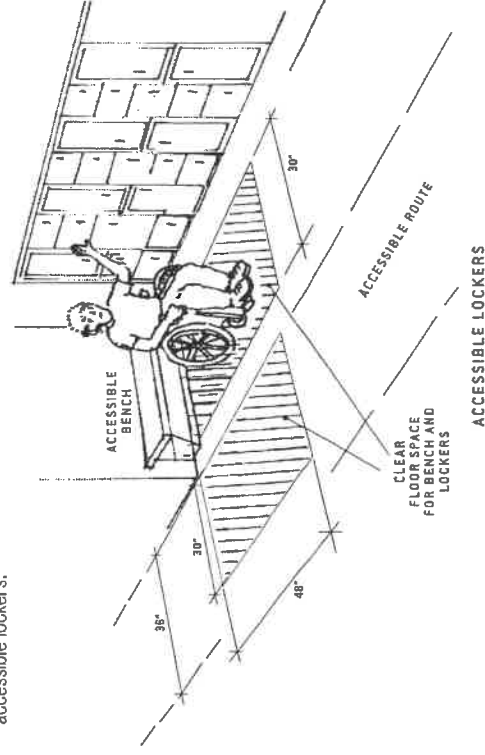
changes in level since some surfaces need to be absorbent. Accessibility is not required in areas that are for animal handlers and not for public use.

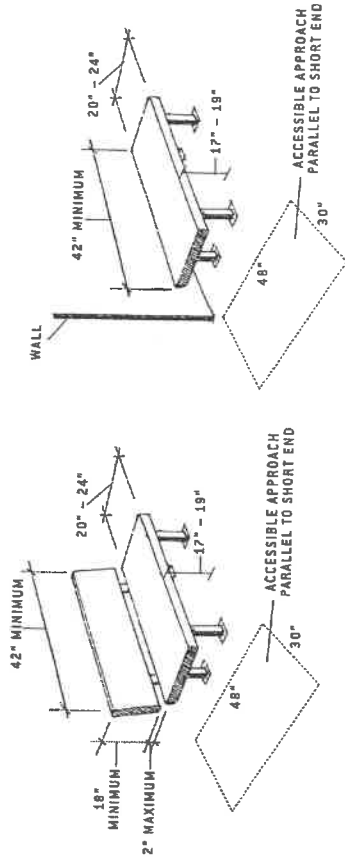
Dressing, Fitting, or Locker Rooms

When provided, dressing, fitting, or locker rooms must be accessible and comply with all ADAAG provisions. If they are in a cluster, 5 percent, or at least one must be accessible. There must be an accessible route through the door and to all elements required to be accessible in the room. Operating mechanisms provided on accessible lockers must also meet ADAAG provisions for their operation and height.

Lockers

If lockers are provided, at least 5 percent, but not less than one of each type (full, half, quarter, etc.) must be accessible. Accessible benches should be located adjacent to the accessible lockers.





ACCESSIBLE BENCH

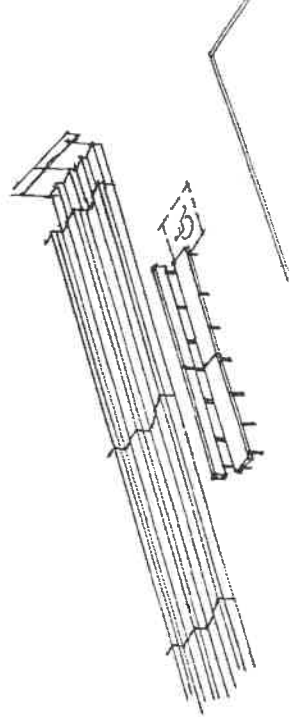
ACCESSIBLE BENCH AGAINST A WALL

Benches

Accessible benches are required in dressing, fitting, and locker rooms, and where seating is provided in saunas and steam rooms. Benches must have a clear floor space positioned to allow persons using wheelchairs or other mobility devices to approach parallel to the short end of a bench seat. In saunas and steam rooms, this floor space may be obstructed by readily removable seats.

Benches must have seats that are a minimum of 20 inches to a maximum of 24 inches in depth and 42 inches minimum in length. The seat height should be a minimum of 17 inches to a maximum of 19 inches above the finished floor. If the bench is not located next to a wall, the bench must have back support that is 42 inches minimum in length and extends from a point 2 inches maximum above the seat to a point 18 inches minimum above the bench. Benches must be strong enough to withstand a vertical or horizontal force of 250 pounds applied at any point on the seat, fastener, mounting device, or supporting structure. The provisions for benches are not intended to apply to park benches or other benches used for sitting or resting.

If benches are located in wet areas, the surface must be slip-resistant and designed not to accumulate water.



ACCESSIBLE TEAM PLAYER SEATING AREA

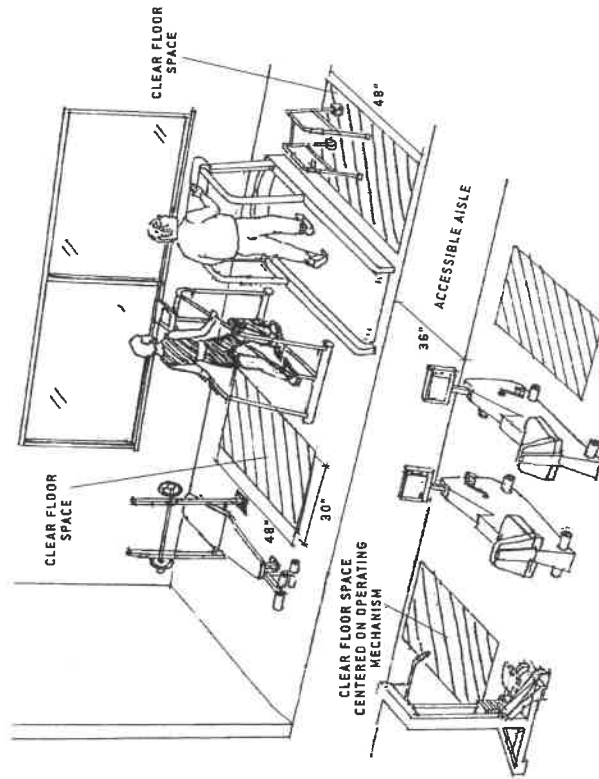
Team Player Seating Areas

Where provided, fixed team or player seating areas must contain the number of wheelchair spaces and companion seats required by ADAAG (based on the number of seats provided), but not less than one space. One option is to provide a clear space adjacent to a fixed bench, with the bench serving as companion seating. If designers and operators are designing a field or court that will serve a variety of wheelchair sports, exceeding the minimum requirements will better accommodate participants.

Wheelchair spaces in the team player seating areas are exempt from the requirements related to admission price and line of sight choices in assembly areas. It is recommended that ramps be used wherever possible for accessible routes connecting team or player seating areas and areas of sport activity. However, a platform lift may be used as part of an accessible route to team player seating areas.

Saunas and Steam Rooms

If saunas or steam rooms are in a cluster, at least 5 percent, but not less than one of each type must be accessible. The wheelchair turning space in the sauna or steam room must comply with ADAAG, except that it can be obstructed by readily removable seats. If seating is provided, at least one bench must be accessible. Doors cannot swing into any part of the clear floor or ground space required for benches.



CLEAR SPACE REQUIREMENTS AROUND EXERCISE EQUIPMENT

Exercise Equipment and Machines

At least one of each type of exercise equipment or machine must have clear floor space of at least 30 by 48 inches and be served by an accessible route. If the clear space is enclosed on three sides (e.g., by walls or the equipment itself), the clear space must be at least 36 by 48 inches.

Most strength training equipment and machines would be considered different types. For example, a bench press machine is different from a biceps curl machine. If operators provide both a biceps curl machine and free weights, both must meet the guidelines in this section even though both can be used to strengthen biceps. Likewise, cardiovascular exercise machines, such as stationary bicycles, rowing machines, stair climbers and treadmills, are all different

types of machines. But if the only difference in equipment provided is that they have different manufacturers, but are the same type, only one must comply.

Clear floor space must be positioned to allow a person to transfer from a wheelchair or to use the equipment while seated in a wheelchair. For example, to make a shoulder press accessible, the clear floor space should be next to the seat. But the clear floor space for a bench press designed for use by a person using a wheelchair would be centered on the operating mechanisms. Clear floor space for more than one piece of equipment may overlap. For example, where different types of exercise equipment and machines are located next to other pieces of equipment, the clear space may be shared. (See figure "Clear Space Requirements Around Exercise Equipment" on page 12.)

The exercise equipment and machines themselves do not need to comply with the ADAAG requirements regarding controls and operating mechanisms.

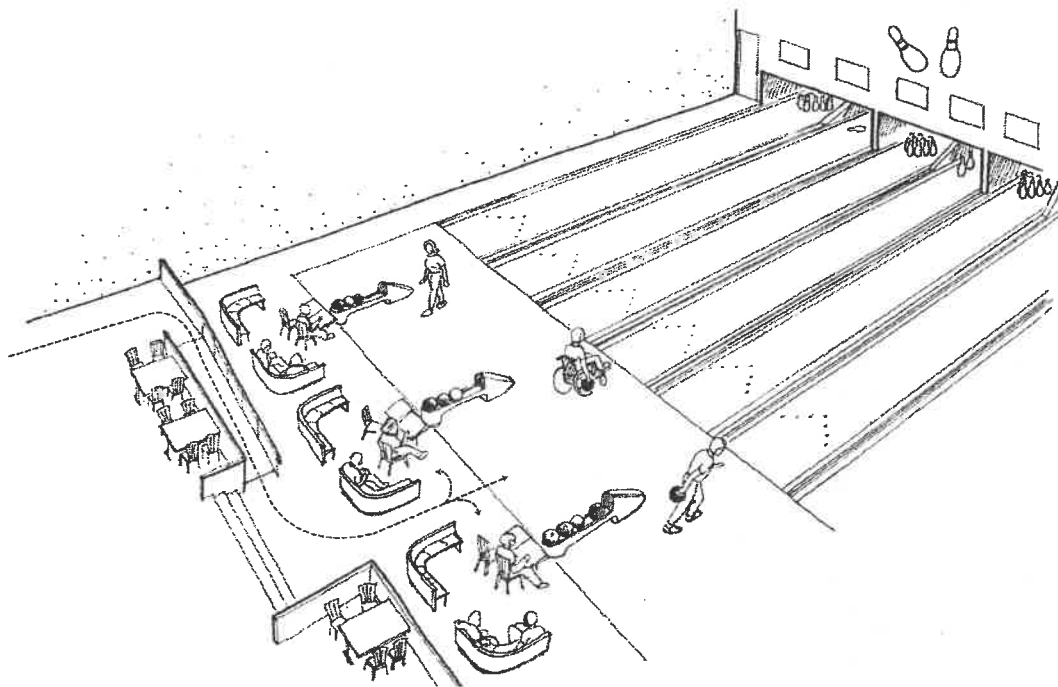
Designers and operators are encouraged to select exercise equipment that provides fitness opportunities for persons with lower body extremity disabilities.

Shooting Facilities

If facilities provide fixed firing positions, at least 5 percent, but not less than one of each type of fixed firing position must be served by an accessible route. Fixed firing positions must have a 60-inch diameter space with slopes not steeper than 1:48 so a wheelchair user can turn around and have a level place from which to shoot.



PARALYZED VETERANS OF AMERICA



ACCESSIBLE ROUTE CONNECTING ACCESSIBLE LANES AND TEAM PLAYER AREAS

Types of different firing positions include positions with different admission prices, positions with or without weather covering or lighting, and positions that support different shooting events (e.g., muzzle loading rifle, small bore rifle, high power rifle, bull's eye pistol, action pistol, silhouette, trap, skeet, and archery).

Bowling Lanes

At least 5 percent, but not less than one, of each type of bowling lane must be accessible. Unlike other areas of sport activity, only those team or player seating areas that serve accessible lanes must be connected with an accessible route and comply with seating requirements. Spectator seating in bowling facilities is addressed in ADAAG and will require wheelchair spaces, companion seating, and designated aisle seats.

More Information

You can obtain copies of the recreation facility guidelines, which include sports facilities, and further technical assistance from the U.S. Access Board at **www.access-board.gov**, **1-800-872-2253**, or **1-800-993-2822 (TTY)**.

ACCESSIBLE PLAY AREAS

A Summary of Accessibility Guidelines for Play Areas



**U.S. Access Board
Summary of Accessibility Guidelines
for Play Areas**

INTRODUCTION

The Americans with Disabilities Act (ADA) is a comprehensive civil rights law that prohibits discrimination on the basis of disability. The ADA requires that newly constructed and altered State and local government facilities, places of public accommodation, and commercial facilities be readily accessible to, and usable by, individuals with disabilities. Recreational facilities, including play areas, are among the facilities required to comply with the ADA.

The Architectural and Transportation Barriers Compliance Board - often referred to as the "Access Board" - has developed accessibility guidelines for newly constructed and altered play areas. The play area guidelines are a supplement to the Americans with Disabilities Act Accessibility Guidelines (ADAAG). Once these guidelines are adopted as enforceable standards by the Department of Justice, all newly constructed and altered play areas covered by the ADA will be required to comply. These guidelines also apply to play areas covered by the Architectural Barriers Act (ABA).

Summary

This guide is intended to help designers and operators in using the accessibility guidelines for play areas. These guidelines establish minimum accessibility requirements for newly constructed and altered play areas. This guide is not a collection of playground designs. Rather, it provides specifications for elements within a play area to create a general level of usability for children with disabilities. Emphasis is placed on ensuring that children with disabilities are generally able to access the diversity of components provided in a play area. Designers and operators are encouraged to exceed the guidelines where possible to provide increased accessibility and opportunities. Incorporating accessibility into the design of a play area should begin early in the planning process with consideration to layout, circulation paths, and the selection of play components.

The play area guidelines were developed with significant public input and carefully considered the balancing of costs, safety, and accessibility. The Access Board sponsored a Regulatory Negotiation Committee to develop proposed guidelines. The public was given an opportunity to comment on the proposed guidelines and the Access Board made changes to the proposed guidelines based on the public comments. The Regulatory Negotiation Committee represented the following groups and associations:

American Society of Landscape Architects	National Easter Seal Society
ASTM Public Playground Committee	National League of Cities
ASTM Soft Contained Play Committee	National Parent-Teacher Association
ASTM Playground Surfacing Systems Committee	National Recreation and Park Association
International Play Equipment Manufacturers Association	Spina Bifida Association of America
National Association of Counties	TASH
National Association of Elementary School Principals	United Cerebral Palsy Association
National Child Care Association	U.S. Access Board
National Council on Independent Living	

This guide is designed to assist in using the play area accessibility guidelines and is divided into the following sections:

- Where Do the Play Area Guidelines Apply?
- What is a Play Component?
- How Many Play Components Must Be on an Accessible Route?
- What Are the Requirements for Accessible Routes?
- What Other Accessibility Requirements Apply to Play Components?
- Soft Contained Play Structures

Copies of the play area accessibility guidelines and further technical assistance can be obtained from the U.S. Access Board, 1331 F Street, Suite 1000 NW, Washington, DC 20004-1111; 800-872-2253, 800-993-2822 (TTY); www.access-board.gov. Alternate formats of this document are also available upon request.



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Play Area Terms

Many terms are used throughout this guide to describe the play area guidelines. Familiarity with these terms is important when applying the guidelines. Other definitions are provided in ADA/ABA.

ABA - Architectural Barriers Act

Access Board – An independent Federal agency that develops accessibility guidelines under the ADA and other laws. The Access Board is also known as the Architectural and Transportation Barriers Compliance Board.

Accessible – Describes a site, building, facility, or portion thereof that complies with the play area guidelines.

Accessible Route – A continuous unobstructed path connecting all accessible elements and spaces of a building or facility. Inside the boundary of the play area, accessible routes may include platforms, ramps, elevators, lifts. Outside the boundary of the play area, accessible routes may also include parking access aisles, curb ramps, crosswalks at vehicular ways, walks, ramps, and lifts.

ADA – Americans with Disabilities Act.

Alteration – An alteration is a change to a building or facility that affects or could affect the usability of the building or facility or part thereof. Alterations include, but are not limited to, remodeling, renovation, rehabilitation, reconstruction, historic restoration, resurfacing of circulation paths or vehicular ways, changes or rearrangement of structural parts or elements, and changes or rearrangement in the plan configuration of walls and full-height partitions. Normal maintenance is not an alteration unless it affects the usability of the facility (*see section on alterations for more details*).

Amusement Attraction – Any facility, or portion of a facility, located within an amusement park or theme park, that provides amusement without the use of an amusement device. Examples include, but are not limited to, fun houses, barrels, and other attractions without seats.

ASTM – American Society for Testing and Materials.

Berm – A sloped surface at ground level designed to ascend or descend in elevation.

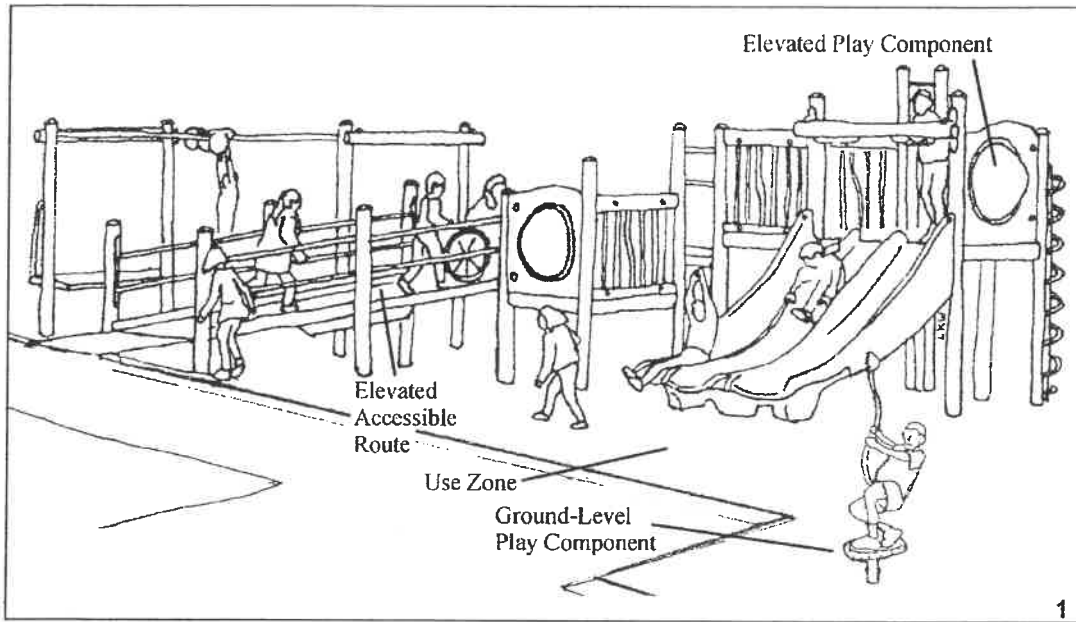
Clear – Unobstructed.

Composite Play Structure – Two or more play structures attached or functionally linked, to create one integral unit that provides more than one play activity (*ASTM F 1487-01*).

Cross Slope – The slope that is perpendicular to the direction of travel (*see running slope*).

Elevated Play Component – A play component that is approached above or below grade and that is part of a composite play structure consisting of two or more play components attached or functionally linked to create an integrated unit providing more than one play activity.





Facility – All or any portion of buildings, structures, site improvements, elements and pedestrian routes or vehicle ways located on a site.

Ground Level Play Component – A play component that is approached and exited at the ground level.

Play Area – A portion of a site containing play components designed and constructed for children.

Play Component – An element intended to generate specific opportunities for play, socialization, or learning. Play components may be manufactured or natural, and may be stand alone or part of a composite play structure.

Ramp – A walking surface that has a running slope of greater than 1:20.

Running Slope – The slope that is parallel to the direction of travel (*see cross slope*).

Site – A parcel of land bounded by a property line or a designated portion of a public right-of-way.

Soft Contained Play Structure – A play structure made up of one or more components where the user enters a fully enclosed play environment that utilizes pliable materials (e.g., plastic, netting, fabric).

Use Zone – The ground level area beneath and immediately adjacent to a play structure or piece of equipment that is designated by ASTM F 1487 Standard Consumer Safety Performance Specification for Playground Equipment for Public Use for unrestricted circulation. This is the play surface upon which it is predicted a user would land when falling from or exiting the equipment.



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WHERE DO THE PLAY AREA GUIDELINES APPLY?

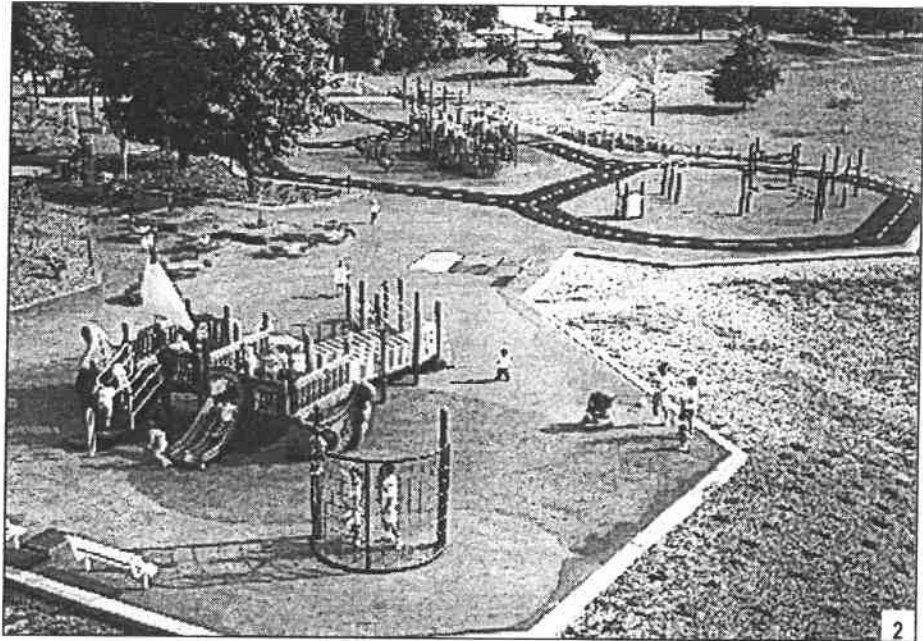
New Construction

The play area guidelines in this guide apply to all newly designed or constructed play areas for children ages 2 and older.

This includes play areas located in a variety of settings: parks, schools, childcare facilities, shopping centers, and public gathering areas. Owners or operators of newly constructed play areas are responsible for complying with these guidelines.

The play area guidelines do not apply to:

- Family childcare facilities where the proprietor resides
- Amusement attractions
- Religious entities



This large play area designed for the same age group is part of a public park system. The total of all the play components in this play area - which includes multiple composite structures - must be counted when applying the play area guidelines.

Alterations

The play area guidelines also apply to existing play areas where alterations occur. Further information regarding the application of the play area guidelines to altered play areas can be found on page 39.

Equivalent Facilitation

Designs that result in products or technologies as alternatives to those prescribed, provided substantially equivalent or greater accessibility and usability.

Equivalent facilitation is the concept of utilizing innovative solutions and new technology, design, or materials in order to satisfy the guidelines. These alternative solutions provide equal access and take advantage of new developments, but may differ technically from specific guidelines.

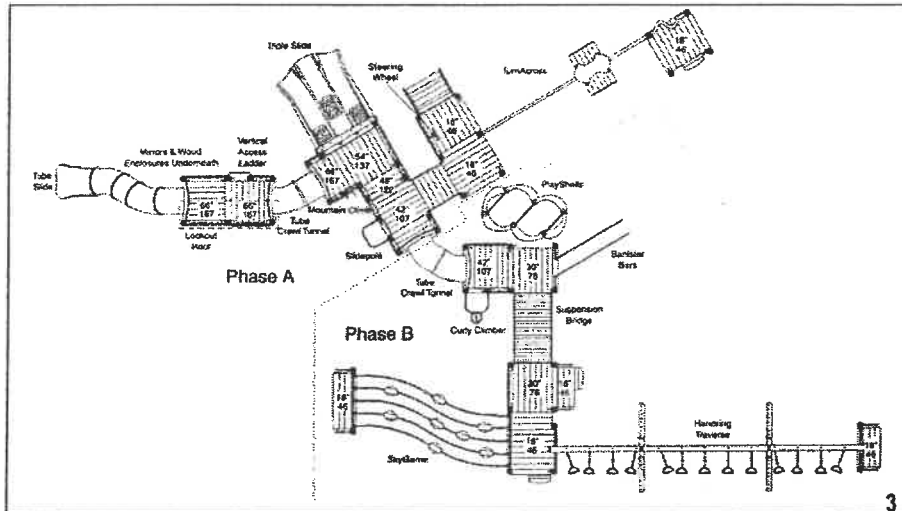


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Phasing in Play Areas

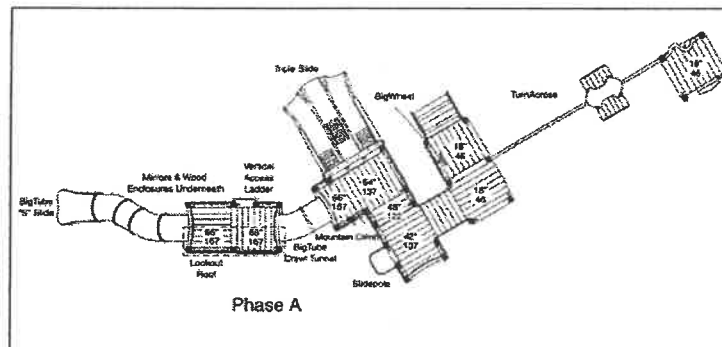
When play areas are constructed in phases, they must continue to meet the play area guidelines throughout construction. The initial phase area must meet the guidelines, and then at each successive phase the whole play area must be reassessed to assure compliance.

"Phased designs" at play areas developed to be installed in different stages, allowing the play area to grow in a planned manner while accommodating budgets, fund raising, or community approval processes.

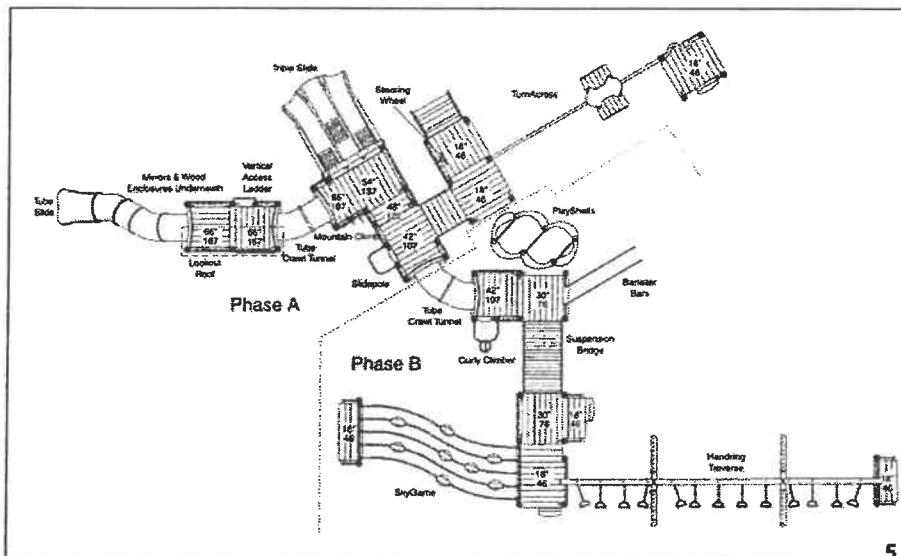


This play area will be installed in two phases. As each phase is completed, the entire play area must be reevaluated for compliance.

Prior to phase one, the first structure is evaluated for compliance, since the guidelines are based on a minimum number of play components required to be on an accessible route.



At the onset of phase two, the play area is reevaluated in its entirety.



U.S. Access Board Summary of Accessibility Guidelines for Play Areas

WHERE DO THE PLAY AREA GUIDELINES APPLY?

Play Areas Separated by Age

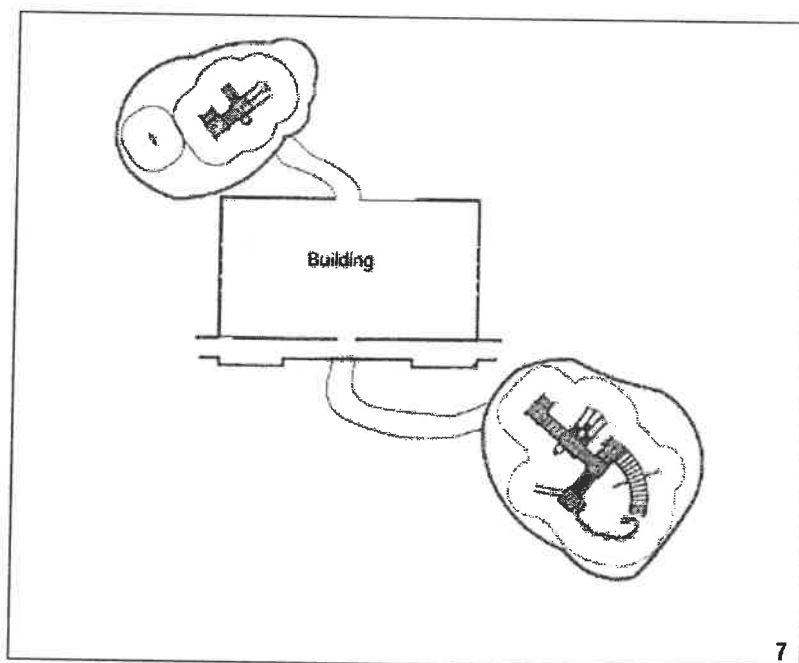
To reduce the risk of injury, safety guidelines recommend separate play areas for different age groups. In applying the guidelines, play areas designed for different age groups should be considered separately.

A play area designed for 2 to 5 year-olds is considered separate from one for 5 to 12 year-olds. Therefore, compliance with the guidelines must be considered for each individual play area.



This dual play area designed for 2 to 5 year-olds and 5 to 12 year-olds shares resilient surfacing. Each section must be evaluated separately.

Geographically Separated Play Areas



Large geographical spaces may contain several play areas within one park setting. Where play areas are geographically separated on a site, they are considered separate play areas. The accessibility guidelines apply to each play area.



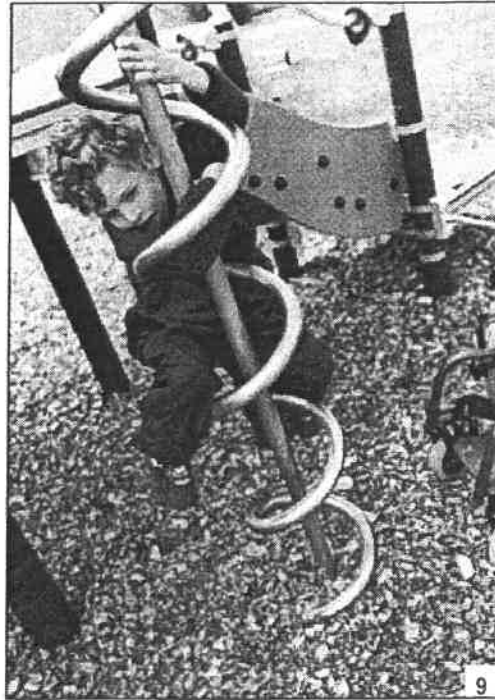
Play Components

A play component is an element designed to generate specific opportunities for play, socialization, and learning. Play components may be manufactured or natural, and may be stand alone or part of a composite play structure. Swings, spring riders, water tables, playhouses, slides, and climbers are among the many different play components.

For the purpose of these guidelines, ramps, transfer systems, steps, decks, and roofs are not considered play components. These elements are generally used to link other elements on a composite play structure. Although socialization and pretend play can occur on these elements, they are not primarily intended for play.



Spring rider



Climber



Swing



Slide



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WHERE DO THE PLAY AREA GUIDELINES APPLY?

"Rocking" is an example of horizontal movement that can be backwards, forwards, sideways or even circular in nature.

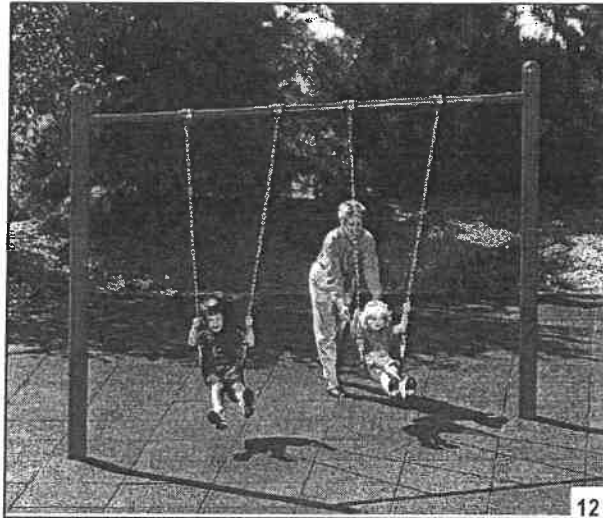
"Sliding" is an example of rapid descent that utilizes the force of gravity.

When applying the play area guidelines, it is important to identify the different play experiences play components can provide.

Different "Types"

At least one of each type of play component provided at ground level in a play area must be on an accessible route.

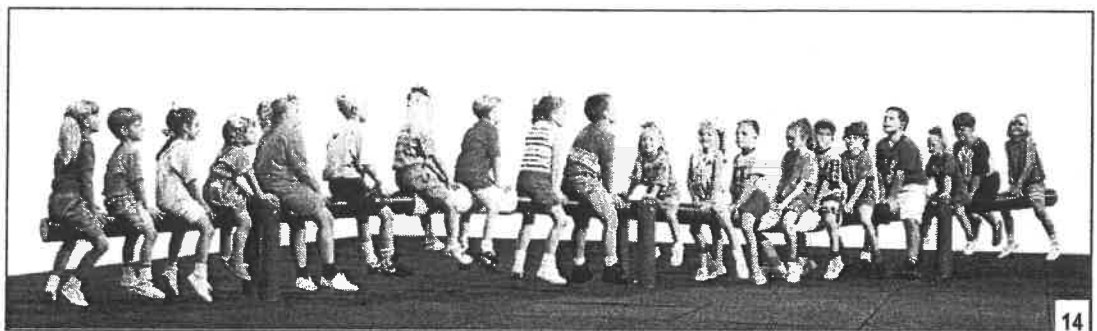
Different "types" of play components are based on the general experience provided by the play component. Different types include, but are not limited to, experiences such as rocking, swinging, climbing, spinning, and sliding.



A Swinging Type



A Rocking Type



This single play component provides one type of play experience for multiple individuals.



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WHAT IS A PLAY COMPONENT?

The number of individuals who can play on a play component at once does not determine the quantity of play components provided in a play area. A play component can hold many children but is considered one type of play experience - or one play component - in the play area.



Examples of Sliding Types



While a spiral slide provides a slightly different experience from a straight slide, the primary experience - a sense of rapid descent or sliding - is common to both activities. Therefore, a spiral slide and a straight slide are considered one "type" of play experience.



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WHAT IS A PLAY COMPONENT?

Elevated Play Components

An elevated play component is a play component that is approached above or below grade and is part of a composite play structure. Play components that are attached to a composite play structure and that can be approached from a platform or deck area are considered elevated play components.



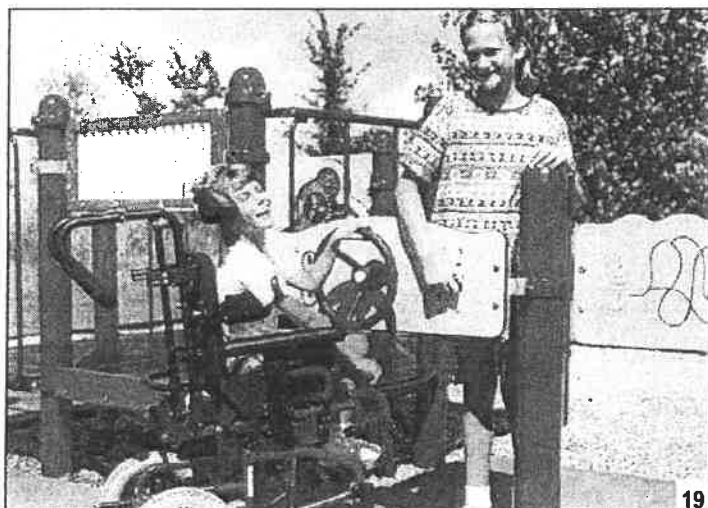
This climber is considered an elevated component, since it can be approached or exited from the ground level or above grade from a platform or deck on a composite play structure.



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Ground-Level Play Components

Ground-level play components are items that can be approached and exited at ground level. For example, a child approaches a spring rider at ground level via the accessible route. The child may ride then exit directly back onto the accessible route. The activity is considered ground level because the child approaches and exits it from the ground-level route.



Ground-level play components may be part of a composite structure.



Ground-level components may also be free-standing in a play area.

When more than one ground-level play component is required on an accessible route, the play components must be integrated. Designers should consider the optimal layout of ground-level play components to foster interaction and socialization among all children. Grouping all ground-level play components accessed by children with disabilities in one location does not constitute integration.

"Ground-level components" are approached and exited at ground level.

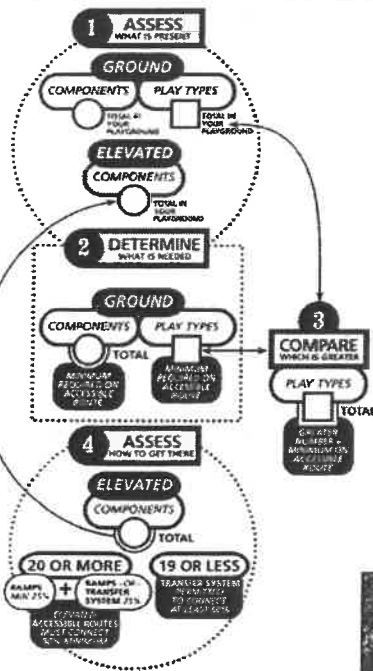
Ground-level play components may include items such as swings, spring riders, and panels.

Freestanding slides are considered ground-level components for the purpose of these guidelines. An accessible route must connect to the ladder or steps, and to the exit of the slide. While this solution does not provide access for all children, it gives many individuals the opportunity to access play components.



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HOW MANY PLAY COMPONENTS MUST BE ON AN ACCESSIBLE ROUTE?



Ground-Level Play Components

There are two requirements addressing how many ground-level play components must be on an accessible route:

- One of Each Type
- Ground-Level Requirements based on the number of Elevated Play Components

One of Each Type

At least one of each type of ground-level play component that is present in the play area must be on an accessible route.

As an example, this play area includes a composite play structure, two spring riders and a swing set (see *inset*). To meet the requirement, an accessible route must connect to at least one spring rider and one swing for one of each type of ground-level play experiences which are present in the play area.



The above step-by-step guide is intended to assist when applying the play area guidelines. A detailed description is provided on page 17.

A "ground-level play component" is a play component that is approached and exited at the ground level.



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HOW MANY PLAY COMPONENTS MUST BE ON AN ACCESSIBLE ROUTE?

Ground Level Requirements

Based on Elevated Play Components

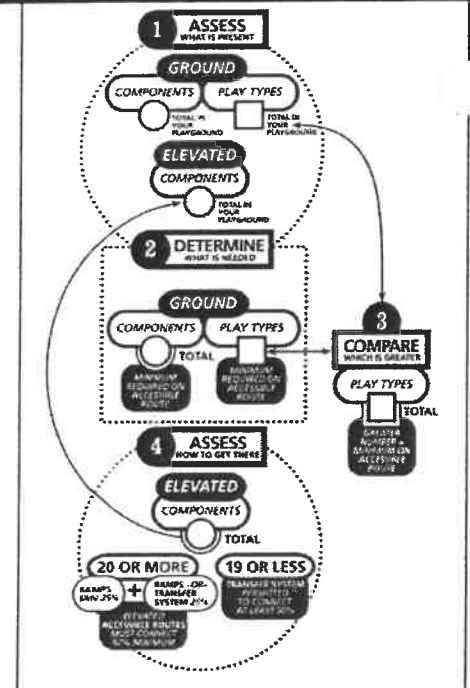
The number and variety of ground-level play components required to be on an accessible route is also determined by the number of elevated components provided in the play area.

The intent of this requirement is to provide a variety of experiences for individuals who choose to remain with their mobility aids, or choose not to transfer to elevated play components.

Table 240.2.1.2		
Number of elevated play components provided	Minimum number of ground-level play components required to be on accessible route	Minimum number of different types of ground-level play components required to be on accessible route
1	Not applicable	Not applicable
2 to 4	1	1
5 to 7	2	2
8 to 10	3	3
11 to 13	4	3
14 to 16	5	3
17 to 19	6	3
20 to 22	7	4
23 to 25	8	4
More than 25	8 plus 1 for each additional 3 over 25, or fraction thereof	5

If ramps provide access to at least 50 percent of the elevated play components - which must include at least three different play types - then additional ground-level components are not required.

In the play area shown on page 14, the composite structure has four elevated play components (bubble panel, slide, steering wheel, and tic-tac-toe panel). According to the table, a minimum of one ground level play component must be provided, and a minimum of one different type. The spring rider or swing can be used to meet the “one of each type” requirement and can also be used to meet the minimum number determined by Table 240.2.1.2.



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HOW MANY PLAY COMPONENTS MUST BE ON AN ACCESSIBLE ROUTE?

Elevated Play Components

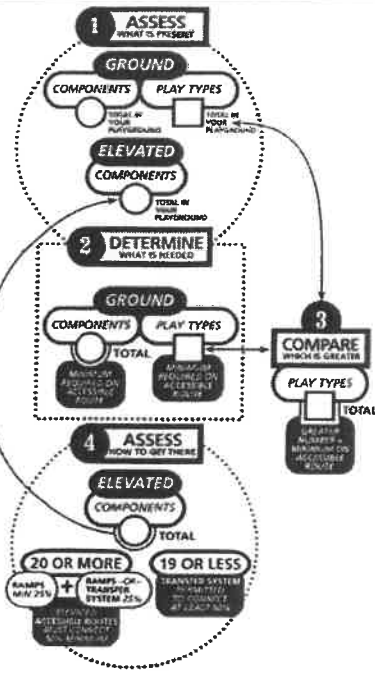
At least 50 percent of the elevated play components must be on an accessible route.



Play areas with 20 or more elevated components must use ramps to connect a minimum of 25 percent of those components. A transfer system or ramps may connect the other elevated play components required on an accessible route.



Play areas with less than 20 elevated play components may use a transfer system instead of ramps to connect at least 50 percent of the elevated components.



The above step-by-step guide is intended to assist when applying the play area guidelines. A detailed description is provided on page 17.

An "elevated play component" is a play component reached from above or below grade, and is part of a composite play structure.



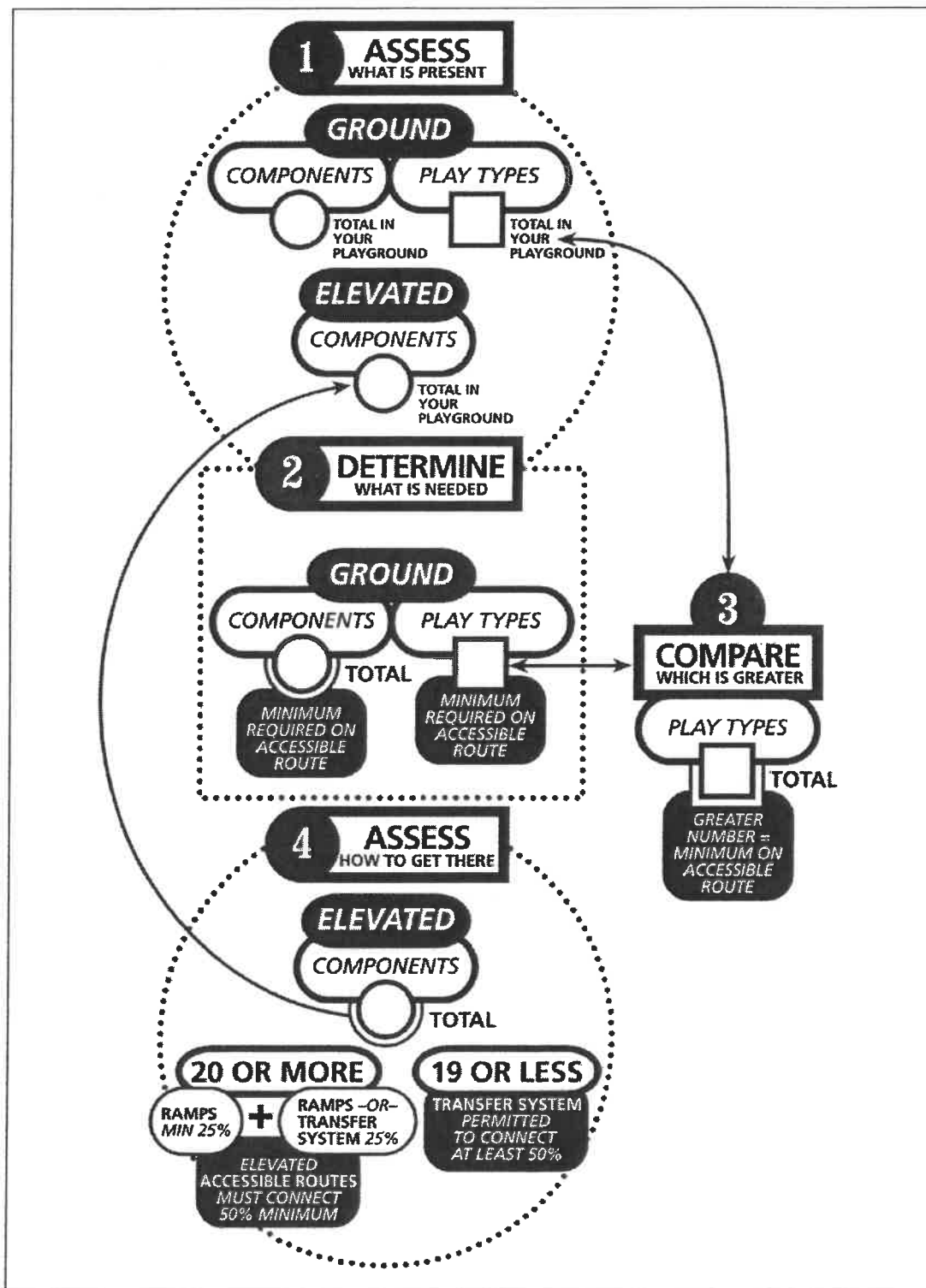
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STEP-BY-STEP GUIDE ON APPLYING GUIDELINES

Step-by-Step Guide

The following step-by-step guide has been provided to assist in evaluating a play area for meeting the minimum requirements of these guidelines. The guide has been arranged in four steps and provides spaces to fill in numeric values of play components for evaluating a specific play area design.

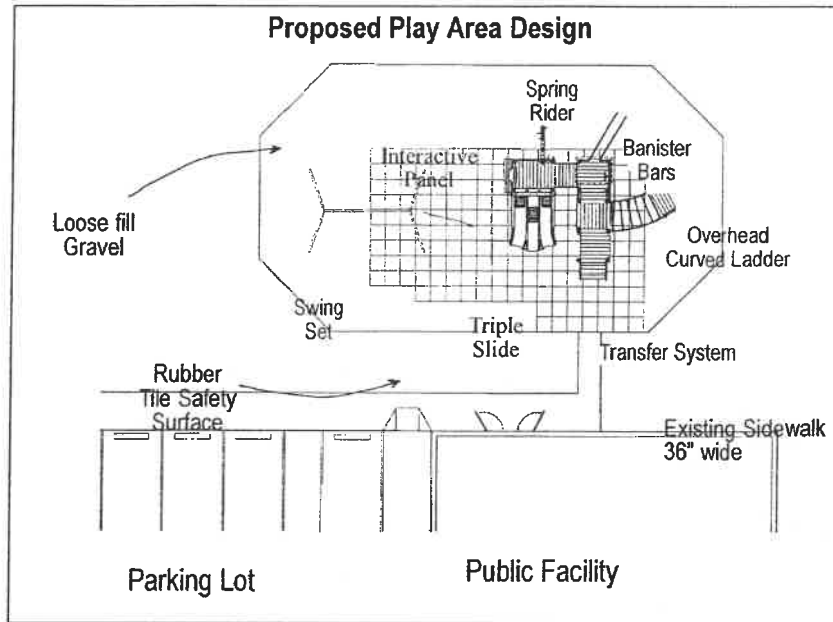
The step-by-step guide is used throughout the remainder of this guide as a key, shown in the upper corner of each new section where it applies.



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PLAY AREA EVALUATION EXAMPLE

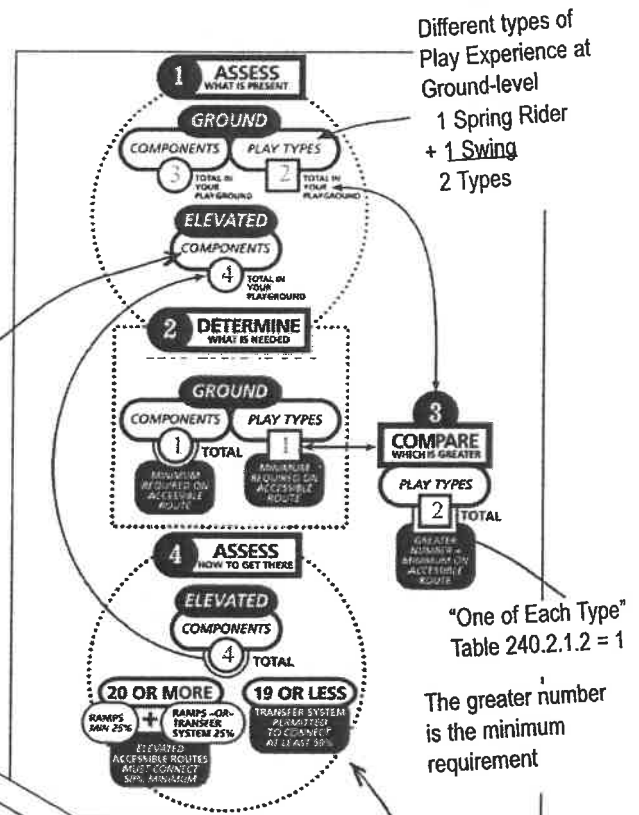
The example below illustrates a proposed design for a new play area. Each section illustrated in the flow chart provides guidelines for the following design tasks:



- Determining the number of play components
- Assessing the variety of play types
- Determining how many play components must be on an accessible route
- Determining when ramps are required and when transfer systems are permitted

Refer to this example while reviewing the concepts explained in this guide, to review how accessibility guidelines are applied to play area designs.

Total # of elevated components
 1 Triple Slide
 1 Interactive Panel
 1 Overhead Curved Ladder
 + 1 Banister Bars
4 total



50% of 4 elevated components = 2 elevated components



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WHAT ARE THE REQUIREMENTS FOR ACCESSIBLE ROUTES?

ADAAG chapter 4 addresses accessible routes that connect the play area to the school, parking lot, or facility that it serves. Operators or owners of play areas are subject to all the other requirements of the ADA, including the obligation to provide individuals with disabilities an equal opportunity to enjoy the play area provided by that facility.

This section describes the various features of accessible routes within a play area, including location, clear width, slope, and accessible surfaces.

Accessible Routes

An accessible route is a pathway specifically designed to provide access for individuals with disabilities, including those using wheelchairs or mobility devices.



Accessible routes inside the boundaries of play areas are addressed in the play area guidelines. Technical provisions address the width, slope, and surface of both ground-level and elevated accessible routes.

There are two types of accessible routes:

- Ground-level
- Elevated



This ground-level route connects ground components and the transfer system which connects elevated components.

This elevated route connects elevated play components on a composite structure.



The accessible route must connect all entry and exit points of accessible play components.

Clear floor space required at play components and maneuvering space can overlap the accessible route.

Incorporating additional circulation space around high-use play components creates extra room for movement and accessibility for everyone using the play area.



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WHAT ARE THE REQUIREMENTS FOR ACCESSIBLE ROUTES?

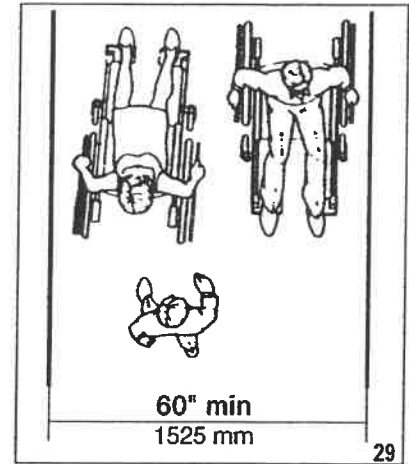
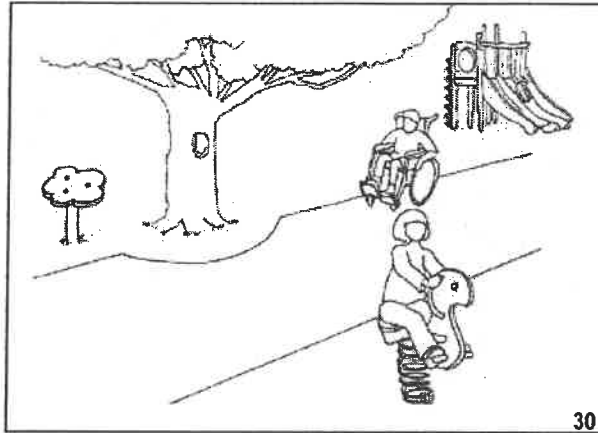
Ground-Level Accessible Routes

The 80-inch vertical clearance applies to ground-level routes only, and not elevated routes. This allows features like protective roofs and sun shelters to be present.

A ground-level accessible route connects play components at ground level.

- 60 inches (1525 mm) minimum clear width
- 1:16 maximum slope

The route may narrow down to 36 inches (915 mm) for a distance of 60 inches (1525 mm). This permits flexibility to work around site design features like existing equipment or trees.



The required 60-inch width enables two wheelchairs to pass each other or to change direction.

Smaller play areas - those that are less than 1,000 square feet (304.8 square meters) - may have ground-level accessible routes that are 44 inches (1120 mm) clear width. A wheelchair turning space must be provided where the route exceeds 30 feet (9.14 mm) in length.

At ground level, objects may not protrude into the 60-inch wide space of an accessible route up to or below the height of 80 inches (2030 mm), measured above the accessible route surface. The 80-inch clearance applies only to the 60-inch accessible route, and is not required for the entire play area.

The play area provides a fun accessible roadway theme. The protective shelters for the benches have been set outside the boundary of the route providing the 80 inches of clearance required on the route.



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WHAT ARE THE REQUIREMENTS FOR ACCESSIBLE ROUTES?

Ground-Level Accessible Routes

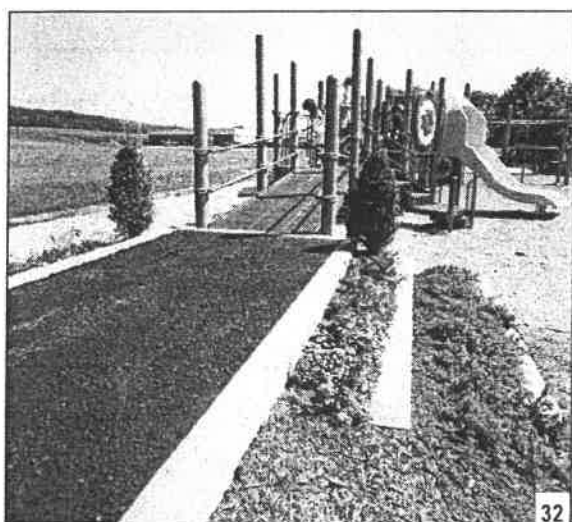
Maximum Slope at Ground Level

The maximum allowable slope for a ground-level accessible route is 1:16.

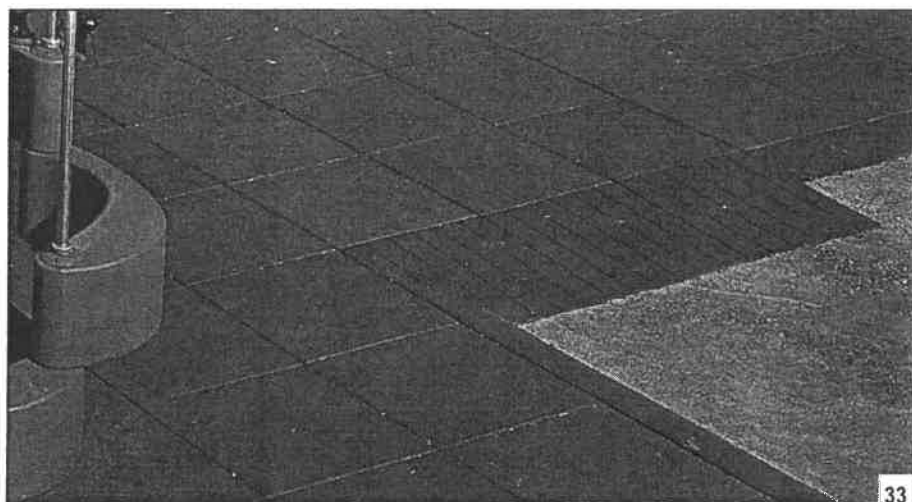
Berms are sometimes used to provide access to elevated play areas. A berm may be a natural sloped surface that is present in a hilly play area site, or a ground-level route built with slopes.

Designers are encouraged to consider edge protection and handrails on berms where there may be a drop-off. Remember the maximum slope of this "ground-level accessible route" is 1:16.

However, handrails are not required on ground-level accessible routes. This is permitted since the handrails may become a safety hazard in the "use zone."



This play area provides a bermed accessible route.



To accommodate a height change along the perimeter of a play area - like these rubber safety tiles placed on an asphalt surface - an allowable 1:12 slope is utilized for the transition at the boundary of the play area.



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WHAT ARE THE REQUIREMENTS FOR ACCESSIBLE ROUTES?

Accessible Ground Surfaces

The "use zone" is a ground level area beneath and immediately adjacent to a play structure or piece of equipment that is designated for unrestricted circulation around the equipment. It is predicted that a user would fall and land or exit the equipment on the surface of the use zone.

The American Society for Testing and Materials (ASTM) has established safety standards for play areas, including resilient surfaces. For further information or to purchase these standards, contact ASTM, 100 Barr Harbor Drive, West Conshohocken, PA 19428-2959, www.astm.org.

Ground surfaces along accessible routes, clear floor or ground spaces, and maneuvering spaces, must comply with the American Society for Testing and Materials (ASTM) F 1951-99 *Standard Specification for Determination of Accessibility to Surface Systems Under and Around Playground Equipment*.

This standard assesses the accessibility of a surface by measuring the work an individual must exert to propel a wheelchair across the surface. The standard includes tests of effort for both straight-ahead and turning movements, using a force wheel on a rehabilitation wheelchair as the measuring device. To meet the standard, the force required must be less than that which is required to propel the wheelchair up a ramp with a slope of 1:14.

When selecting ground surfaces, operators should request information about compliance with the ASTM F 1292-04 standard.



Accessible surfaces can include impact-attenuating tiles made of recycled rubber and engineered wood fiber that meet the ASTM requirements for accessibility and safety. The design can be created so safety is not compromised for individuals using the play area where both standards are applied.

Accessible Surfaces Located In The Use Zone

If located within the use zone, accessible ground surfaces must also be impact attenuating and meet ASTM F 1292-04 Standard Specification for Impact Attenuation of Surface Systems Under and Around Playground Equipment.

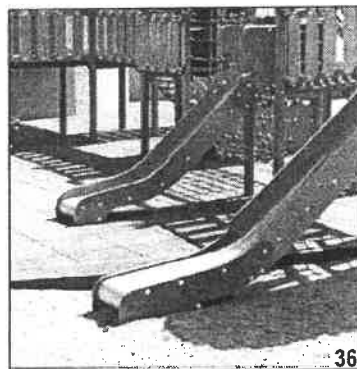


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WHAT ARE THE REQUIREMENTS FOR ACCESSIBLE ROUTES?



Accessible and non-accessible surfaces can be combined to provide variety and excitement in the play area.



At the time of this publication, rubber surfacing and some engineered wood fiber products meet the ASTM F 1951-99 standard. The fact that a specific product meets the ASTM 1951-99 standard does not necessarily mean that all other similar products will meet the standard.



Rubber surfacing tiles facilitate access in this play area.

Ground surfaces must be inspected and maintained regularly and frequently to ensure continued compliance with the ASTM F 1292-04 standard. The frequency of maintenance and inspection of resilient surfacing depends on the amount of use and the type of surfacing installed.

Operators interested in selecting surfaces to comply with the play area guidelines, should consult individual product manufacturers to determine compliance with ASTM F 1951-99.



Accessible surfacing can be designed to complement the theme of the play area, while providing full access and visually integrating the surface into the overall design. Individuals of all abilities will enjoy the added benefits of an imaginative design.

Engineered wood fiber surfaces will require frequent maintenance to comply with the ASTM F 1292-04 standard because of surface displacement due to user activity or other factors.

Designers and operators are likely to choose materials that best serve the needs of each play area. The type of material selected will affect the frequency and cost of maintenance.



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WHAT ARE THE REQUIREMENTS FOR ACCESSIBLE ROUTES?

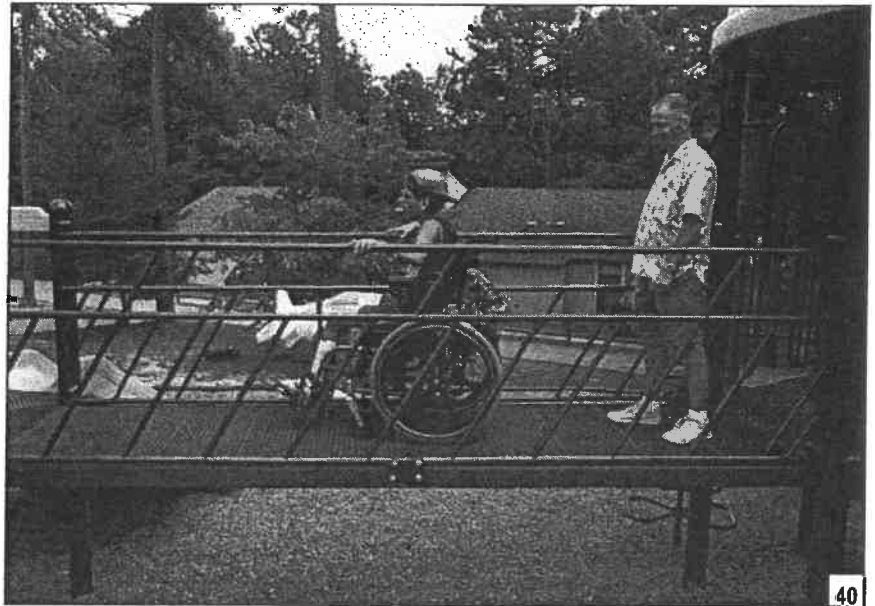
Elevated Accessible Routes

'Ramps' serve as a continuation of the accessible route from the ground allowing individuals who use mobility devices to access elevated components. The guidelines require that play areas containing 20 or more elevated play components provide ramp access to at least 25 percent of those elevated components.

An elevated accessible route is the path used for connecting elevated play components.

Elevated accessible routes must connect the entry and exit points of at least 50 percent of the elevated play components provided in the play area.

Two common methods for providing access to elevated play components are ramps and transfer systems. Ramps are the preferred method since not all children who use wheelchairs or other mobility devices may be able to use - or may choose not to use - transfer systems.



This photo illustrates an elevated accessible route:

- 36-inch (915 mm) clear width
- 32-inch (815 mm) narrowed width permitted for 24-inch (610 mm) length to accommodate features in the composite structure
- 12-inch (305 mm) rise maximum per ramp run
- Top of handrail gripping surfaces shall be 20 inches (510 mm) minimum to 28 inches (710 mm) maximum above the ramp surface



The 80-inch vertical clearance height does not apply to elevated accessible routes. This allows for the use of features such as roofs and sun shelters.



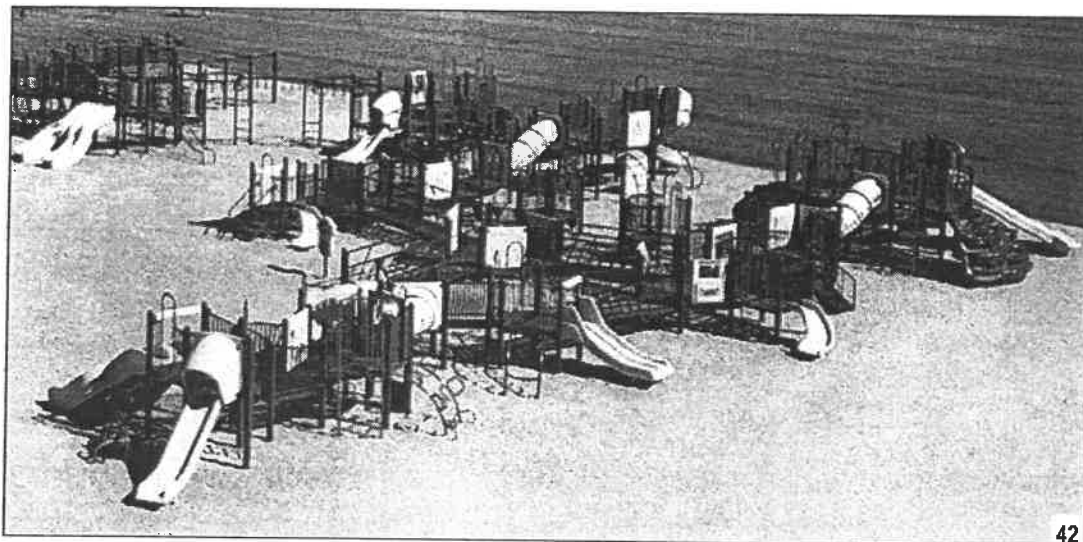
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WHAT ARE THE REQUIREMENTS FOR ACCESSIBLE ROUTES?

When Ramps Are Required

Ramps are required on composite structures with 20 or more elevated play components and must connect to at least 25% of the elevated play components.

Ramps allow individuals who use wheelchairs and mobility devices to access elevated play components in composite play structures without transferring.



This play area has more than 20 play components and provides ramp access to elevated play components. The ramp system, consisting of ramp runs and landings, must connect at least 25 percent of the elevated play components. The balance of the elevated play components required to be on an accessible route may be connected by the ramp system, or by a transfer system.

Rise of a ramp is the amount of vertical distance the inclined or slanted surface ascends or descends. A ramp **run** is a length of a continuous sloped surface that is ascending or descending. For example, to reach a 12-inch high deck or platform, a designer could use a 12-foot ramp with the maximum 1:12 slope, or a 14-foot ramp with a less steep 1:14 slope.

Platform lifts, also known as "wheelchair lifts," may be considered for providing access to elevated play components when appropriate.

Where applicable, platform lifts complying with ADA/ABA Accessibility Guidelines chapter 4 and applicable state and local codes are permitted as a part of an accessible route. Because lifts must be independently operable, owners and operators should carefully consider the appropriateness of their use in unsupervised settings.



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WHAT ARE THE REQUIREMENTS FOR ACCESSIBLE ROUTES?

"Ramps" are sloped surfaces that provide individuals who use mobility devices with access to elevated components.

Ramps

For each elevated ramp run:

- 12-inch (305 mm) maximum rise
- 1:12 maximum slope
- 36-inch (915 mm) minimum clear width



Landings

Landings are the level surfaces at the top and bottom of each ramp run.

- Must be as wide as the ramp they connect to
- A minimum length of 60-inches (1525 mm)
- If ramps change direction, the minimum landing size must be 60 inches (1525 mm) wide to accommodate a turn

Maneuvering Space

Where Ramps are Provided

At least one maneuvering space must be provided on the same level as the play component. The space must have a slope no steeper than 1:48 in all directions (see page 34 for further details).

ADA/ABA Accessibility Guidelines addresses additional requirements for ramps and landings including edge protection, cross slope, surfaces, and outdoor conditions.



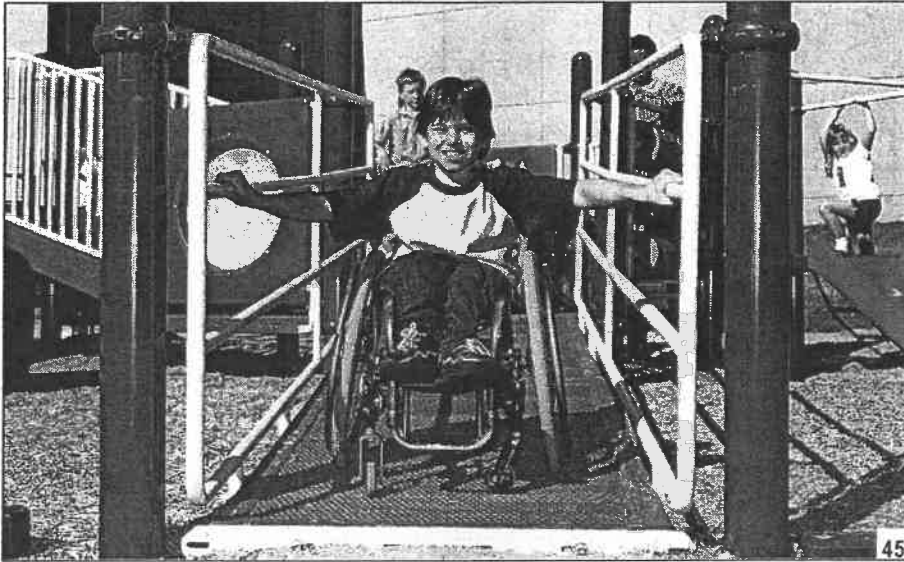
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WHAT ARE THE REQUIREMENTS FOR ACCESSIBLE ROUTES?

Handrails

Handrails are required on both sides of ramps connecting elevated play components. Handrails must comply with the following:

- Clearance between handrail gripping surfaces and adjacent surfaces shall not be 1 1/2 inches (38mm) minimum.
- Handrail gripping surfaces shall be continuous along their length and shall not be obstructed along their tops or sides. The bottoms of handrail gripping surfaces shall not be obstructed for more than 20 percent of their length. Where provided, horizontal projections shall occur 1 1/2 inches (38mm) minimum below the bottom of the handrail gripping surface.



In this case, additional handrails have been provided.

Handrails are required to comply with ADA/ABA 505. However, extensions on handrails in the play area are not required. This is to prevent children running into protruding rails in the play area.



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WHAT ARE THE REQUIREMENTS FOR ACCESSIBLE ROUTES?

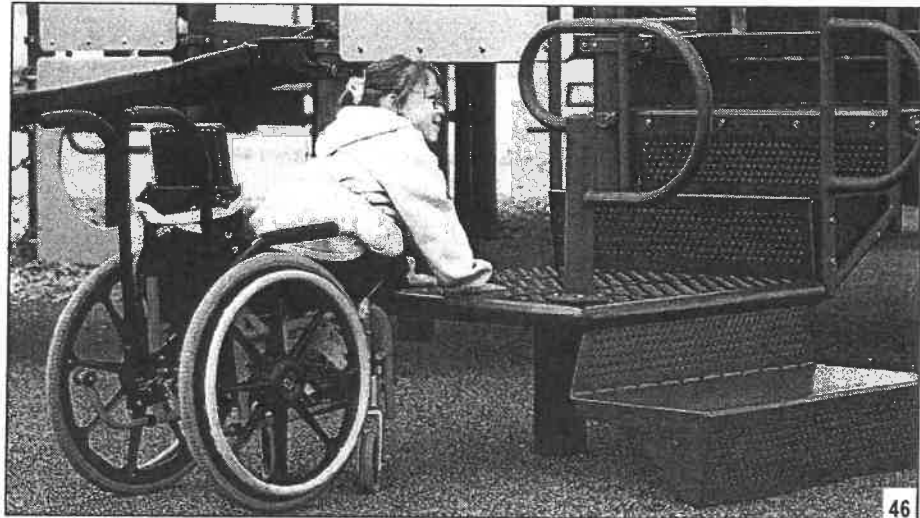
When Transfer Systems Are Used

A "transfer system" is an alternative to a ramp system in play areas where there are less than 20 total elevated play components.

The transfer system must connect to the ground-level accessible route and provide access to at least 50 percent of the elevated play components.

A transfer system provides access to elevated play components within a composite system by connecting different levels with transfer platforms and steps.

A transfer system provides access to elevated play components without the use of a wheelchair or mobility device. At least 50% of the elevated play components can be connected by a transfer system in play areas with less than 20 elevated components. In play areas with 20 or more elevated play components, transfer systems may be used to connect up to 25% of the elevated play components and the rest of the elevated play components required to be on an accessible route must be connected by a ramp.



A transfer system typically consists of a transfer platform, transfer steps, and transfer supports.

Where a transfer system is provided, a combination of transfer platforms and transfer steps provide a continuous accessible route to elevated play components. A transfer system provides individuals the space necessary to physically transfer up or down in a composite play structure. Where provided, a 24-inch (610 mm) minimum width is necessary for individuals moving around a structure.



Playful features can be part of the transfer system, providing interactive experiences from both an elevated or ground level approach.

Consider the distance someone must travel to reach play components accessed by transfer systems. On page 31, the illustration shows a transfer system placed directly next to the slide. Access to this type of elevated play component has been carefully designed to minimize the distance someone must transfer to reach it.



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WHAT ARE THE REQUIREMENTS FOR ACCESSIBLE ROUTES?

Transfer Platforms

A transfer platform is a platform or landing that an individual who uses a wheelchair or mobility device can use to lift or *transfer* onto the play structure and leave the wheelchair or mobility device behind at ground-level.



- 11 inches (280 mm) to 18 inches (455 mm) height of top surface
- Minimum 24 inches (610 mm) wide
- Minimum 14 inches (355 mm) deep
- Unobstructed side

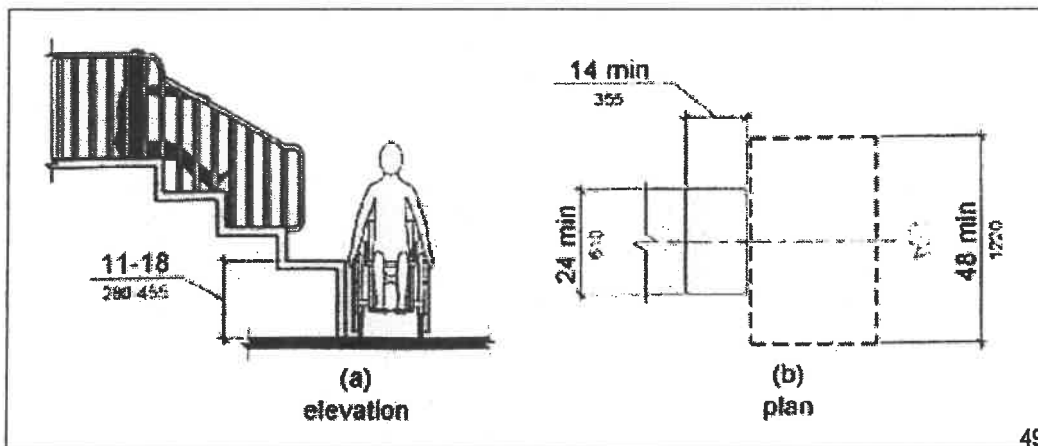
Adding a transfer step that leads to the ground's surface increases access for children exiting components at the ground level.

Transfer steps in a play area are not required to satisfy the general ADAAG stair requirements.

Maneuvering space and clear space is not required on elevated structures or at elevated play components reached by a transfer system.

Clear floor or ground space - used for parking wheelchair or mobility devices (commonly called "wheelchair parking") - is required at the transfer platform.

The 48-inch long side (1200 mm) of the "wheelchair parking" space must be parallel to the 24-inch (610 mm) side of the transfer platform.



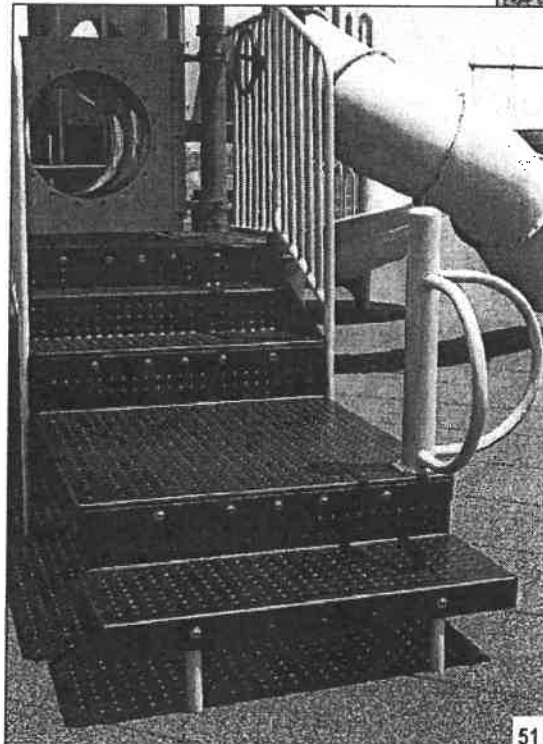
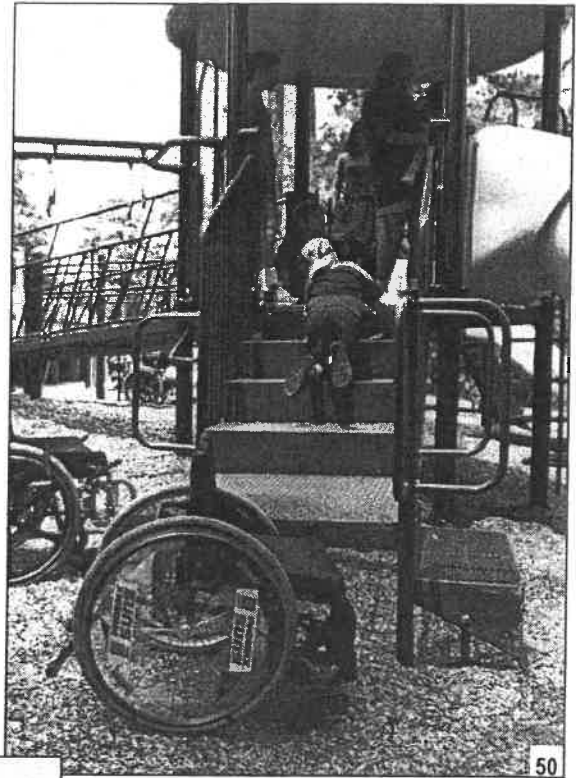
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WHAT ARE THE REQUIREMENTS FOR ACCESSIBLE ROUTES?

Transfer Steps

Transfer steps are level surfaces in a composite structure that can be used for transferring from different levels to access play components.

- Minimum 24 inches (610 mm) wide
- Minimum 14 inches (355 mm) deep
- 8 inches (205 mm) maximum height



Play areas intended for smaller children should provide steps at smaller height increments. This will accommodate smaller sized children who must lift or "bump" up each step.



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WHAT ARE THE REQUIREMENTS FOR ACCESSIBLE ROUTES?

Transfer Supports

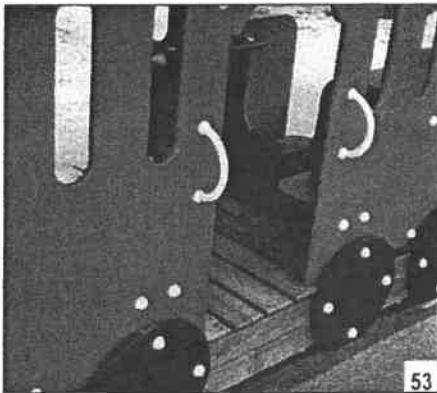
Transfer supports must be provided on transfer platforms and transfer steps at each level where transferring is the intended method of access.



Materials in a variety of different shapes and sizes are used to manufacture transfer supports including metal, plastic, and rope.

A means of support is required when transferring into the entry or seat of a play component.

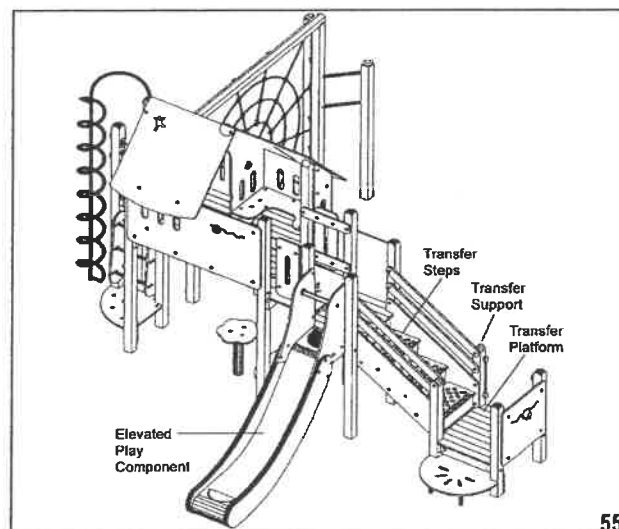
Transfer supports assist individuals with transferring and general mobility. They include handrails, handgrips, or custom designed handholds.



Aesthetically pleasing cut-out shapes and other design enhancements can provide hand supports for transferring.

Consideration must be given to the distance between the transfer system and the elevated play components it is intended to facilitate. Designers should minimize the distance between the point where a child transfers from a wheelchair or mobility device and the elevated play destination.

This transfer system provides access to exciting elevated play experiences like sliding while minimizing the distance individuals must traverse.



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WHAT ARE THE REQUIREMENTS FOR ACCESSIBLE ROUTES?

Connected Elevated Components

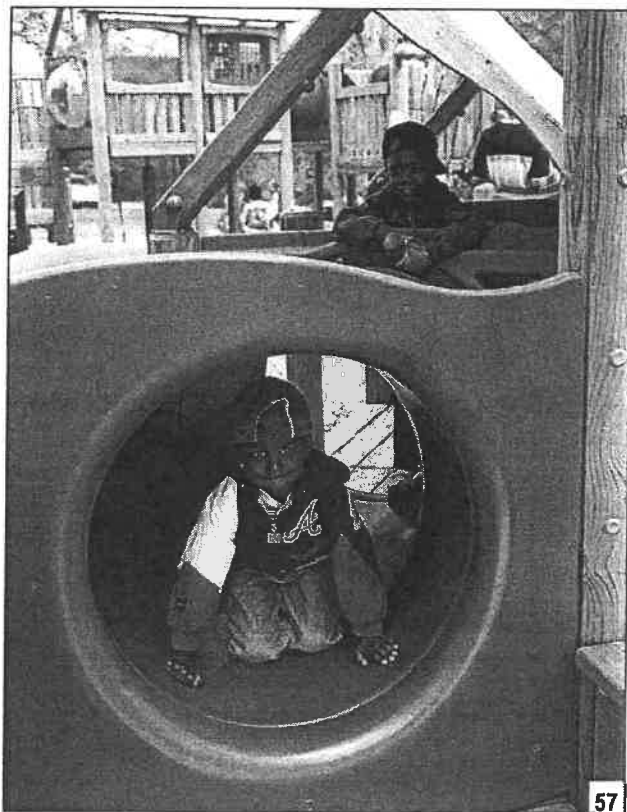
Elevated play components that are connected to other play components count toward fulfilling the requirement for the number of elevated components on an accessible route where transfer systems are used.

When transfer systems are used, an elevated play component may connect to other elevated play components, providing an innovative, accessible route.

A crawl tube is an elevated play component in this composite structure. Going through the tunnel provides access to additional activities on the other side.



Consideration should be given to how a play component is utilized when it is selected to connect to other elevated play events. When a transfer system is provided, children move through a play component like this crawling tube, using their own strength without a mobility device.



Providing variety and excitement through elevated play spaces benefits all children. Tunnels and tubes make "getting there" an activity in itself.



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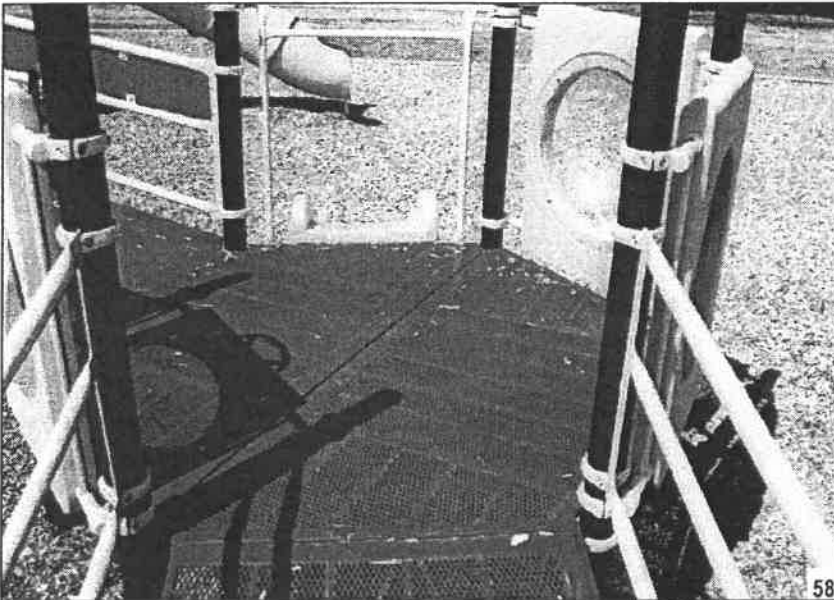
WHAT OTHER ACCESSIBILITY REQUIREMENTS APPLY TO PLAY COMPONENTS?

The play area guidelines address accessible routes connecting play components along with certain spaces that are crucial to making a play area usable for children with disabilities. The other requirements for play components are provided to promote general usability, with application to a variety of play components. Additional features will assist in making play components more accessible to more children. Designers are encouraged to consider components with back support, increased space for maneuvering adjacent to the play component, and other features that promote independent use.

Clear Floor or Ground Space

Clear floor space - also known as ground space - provides unobstructed room to accommodate a single stationary wheelchair and its occupant at a play component on an accessible route.

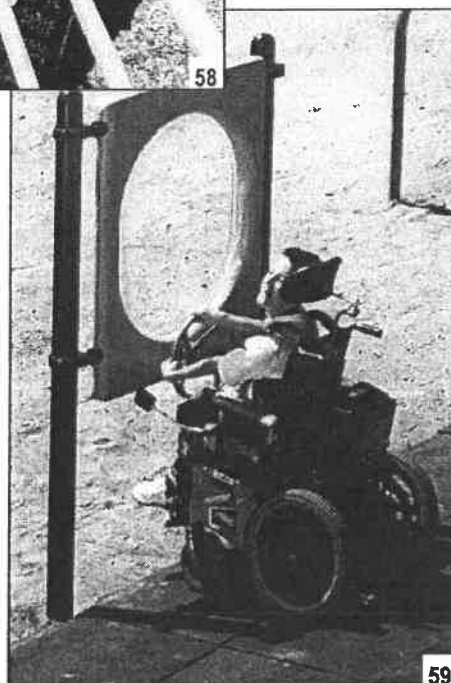
- 30-inch (760 mm) by 48-inch (1220 mm) minimum area
- May overlap accessible routes and maneuvering spaces
- Slope not steeper than 1:48 in all directions



The clear floor space is permitted to overlap onto the landing area to provide access to this elevated window activity.

Play components come in a variety of shapes and sizes facilitating a broad range of experiences. A specific location for clear floor or ground space has not been designated. Each play component is unique and the spaces must be placed in the best location for the situation.

This interactive play component has a clear ground space that allows front or side reach interaction.



Elevated play components accessed by transfer systems do not require maneuvering or clear floor spaces, since mobility devices are left at ground level.

Clear floor or ground space is also sometimes called "wheelchair parking space."

The minimum clear floor or ground space on a composite structure may be positioned for a forward or parallel approach. It may overlap accessible routes and maneuvering spaces.



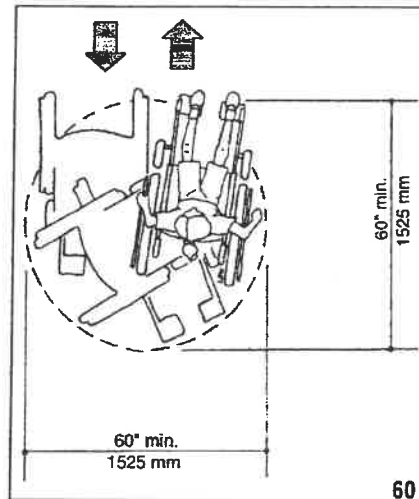
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WHAT OTHER ACCESSIBILITY REQUIREMENTS APPLY TO PLAY COMPONENTS?

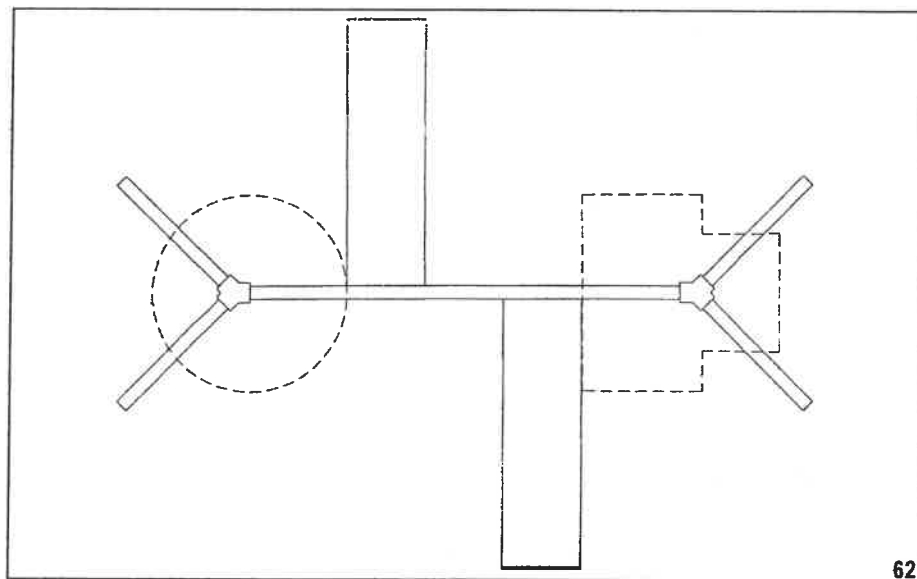
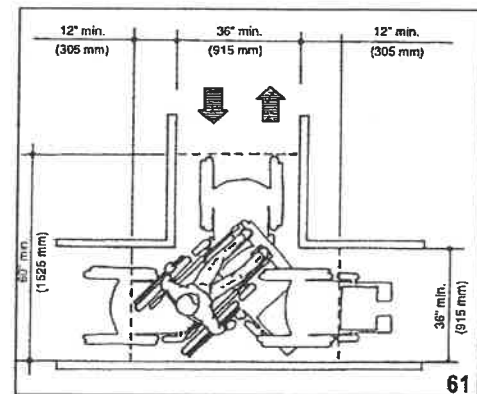
Maneuvering Space

Maneuvering space is defined as the space required for a wheelchair to make a 180-degree turn. At least one maneuvering space must be provided on the same level as elevated play components.

When providing access to ground level and elevated play components by ramps, space allowances to accommodate wheelchairs and mobility devices are required.



- A 60-inch (1525 mm) turning circle permits individuals with mobility devices to turn around
- A 60-inch (1525 mm) T-Shaped turn allows an individual to change directions by making a series of multi-point turns
- Slope not steeper than 1:48 in all directions



Maneuvering space is required for swings and must be located adjacent to the swing. This illustration shows options for either a 60-inch turning circle or a T-shaped turn. While this illustration shows the maneuvering space to the side of the swing, the space may be located behind or in front of the swing as long as it is immediately adjacent to the swing.

Objects are not permitted to protrude into ground level maneuvering spaces at or below 80 inches (2030 mm) above the ground or floor surface.



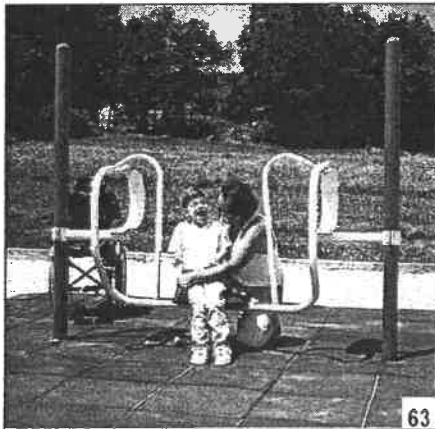
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WHAT OTHER ACCESSIBILITY REQUIREMENTS APPLY TO PLAY COMPONENTS?

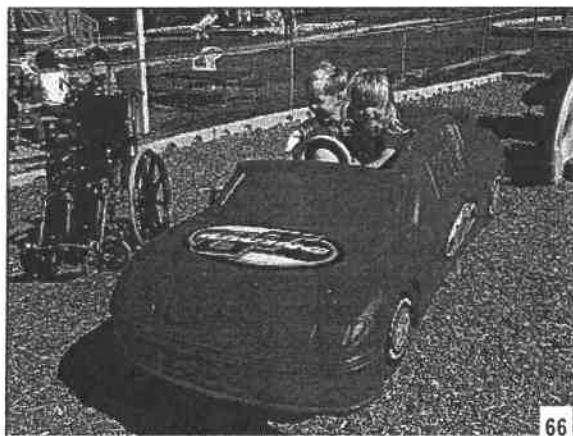
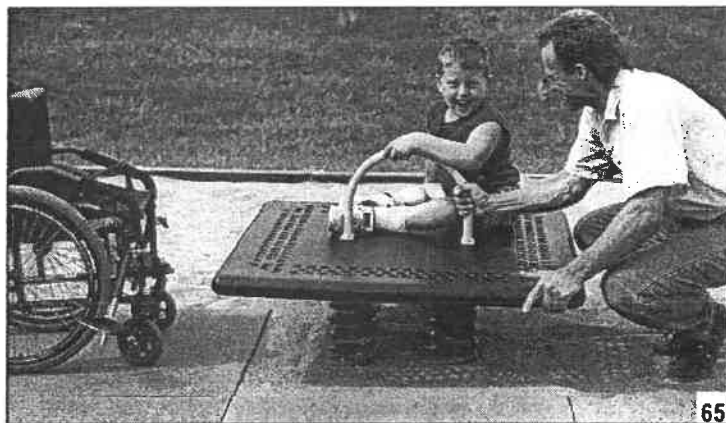
Entry Points and Seats

Entry points and seats are features of play components where individuals would transfer, sit, or gain access. When play components are located on an accessible route, the height required to transfer directly to the entry point or seat of a play component has a minimum of 11 inches (280 mm) and a maximum of 24 inches (610 mm). A mid-level height of 18 inches (455 mm) is recommended.

The height of the entry point of a slide is not specified.



Examples of entry points and seats include swing seats, spring rocker seats, and crawl-tube openings.



Consider design features like open sides, back supports, and hand supports to help facilitate easy transfer and access.



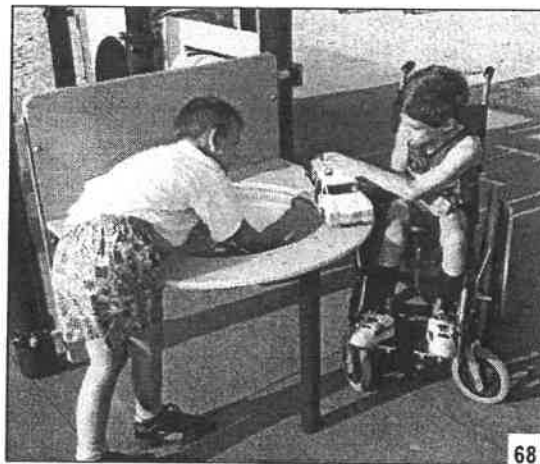
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Play Tables

Play tables may be located at a ground or elevated level in a composite play structure. Consider the route, clear floor space and maneuvering spaces for tables intended to be accessible to individuals who use wheelchairs.

Play tables are surfaces, boards, slabs, or counters that are created for play. This includes tables designed for sand and water play, gathering areas, and other activities. Where play tables are located on an accessible route, the wheelchair knee clearance minimums are:

- 24 inches (610 mm) high minimum
- 30 inches (760 mm) wide minimum
- 17 inches (430 mm) deep minimum



Play tables designed primarily for children under 5-years-old, may provide a parallel approach instead of knee clearance if the rim is a maximum of 31 inches (785 mm) high.



The edge of this elevated sand table has been designed to provide access by providing a generous opening. The tops of rims, curbs, or other obstructions that would prevent access to a table surface should be 31 inches (785 mm) maximum in height.



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WHAT OTHER ACCESSIBILITY REQUIREMENTS APPLY TO PLAY COMPONENTS?

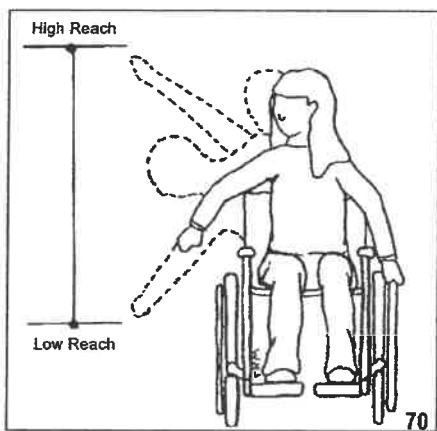
Reach Ranges (Advisory)

The play area guidelines include advisory information on recommended reach ranges.

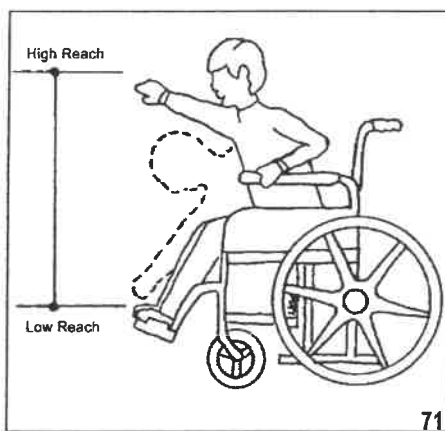
Reach ranges are the recommended designated regions of space that a person seated in a wheelchair can reasonably extend their arm or hand to touch, manipulate, move, or interact with an object or play component.

Reach ranges should be considered when providing play components with manipulative or interactive features for children who use wheelchairs. Recommended forward or side reach ranges are:

- 20 to 36 inches for 3 to 4 year-olds
- 18 to 40 inches for 5 to 8 year-olds
- 16 to 44 inches for 9 to 12 year-olds

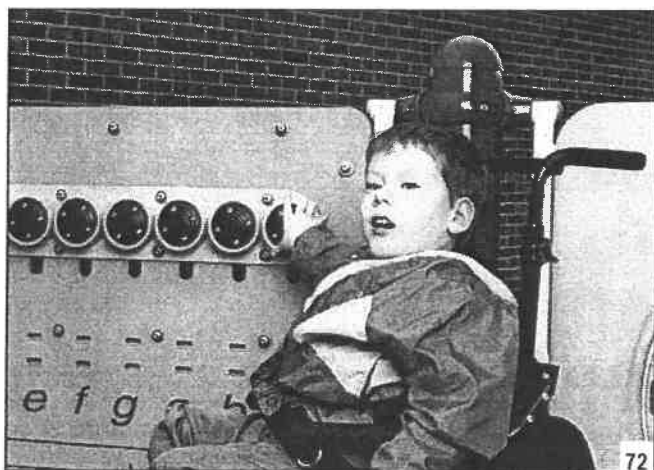


Side Reach



Forward Reach

The reach ranges appropriate for use by children who use wheelchairs to access play components are intended for ground-level components, and elevated components accessed by ramps. Reach ranges are not appropriate for play components reached by transfer systems.



Appropriate reach range heights will vary depending on how the play component is accessed. This interactive panel is mounted at a height appropriate for a child who uses a wheelchair.

The reach ranges in this guide are recommendations that should be considered when designing play components with manipulative features intended for use by individuals who use wheelchairs.



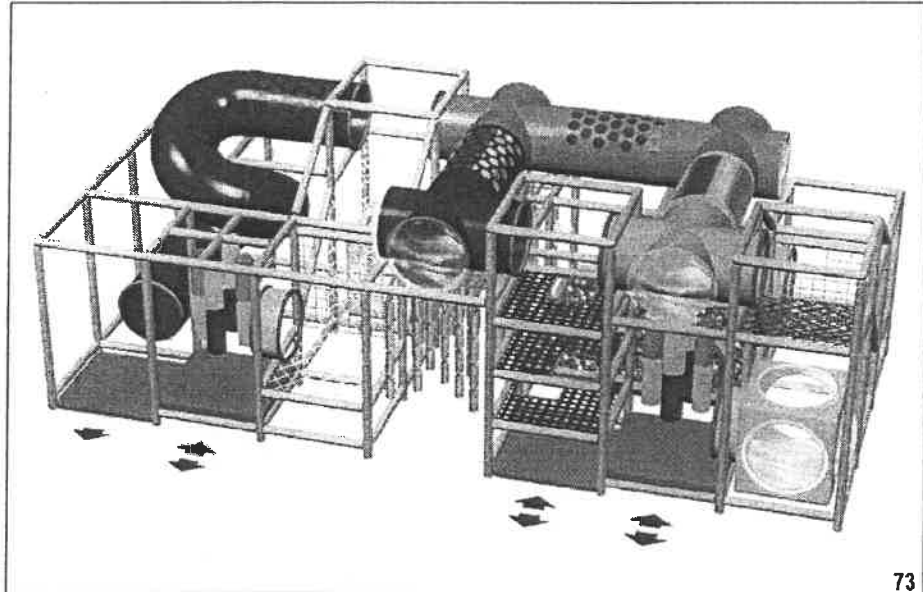
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SOFT CONTAINED PLAY STRUCTURES

“Soft contained play equipment” is a play structure made of one or more components, on which an individual enters a fully enclosed play environment that uses pliable materials such as plastic, soft padding, and fabric.

Soft contained play structures must provide at least one entry point on an accessible route when three or fewer entry points are provided.

If four or more entry points are provided, at least two entry points must be located on an accessible route.



Soft contained play environments typically have limited entrance and exit locations, with play components integrated into the system design.



Transfer systems or platform lifts can serve as a part of an accessible route connecting entry points on soft-contained play structures.



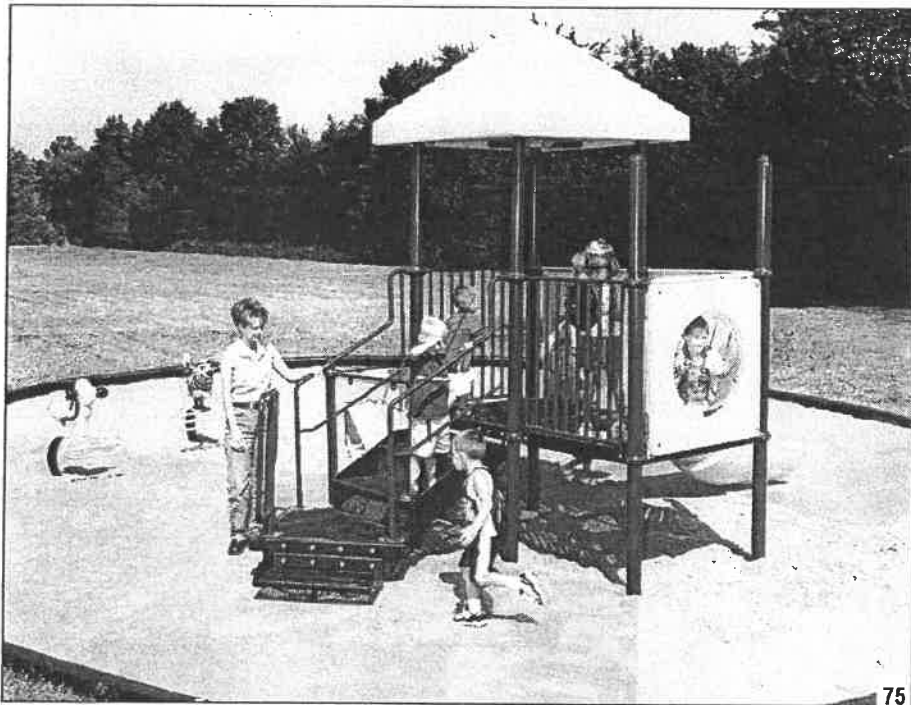
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ALTERATIONS

The play area guidelines apply to alterations made to existing play areas that affect, or could affect, the usability of the play area. Examples include removing a climbing play component and replacing it with a spring rocker, or changing the ground surfacing.

Alterations provide an opportunity to improve access to existing play areas. Where play components are altered and the ground surface is not, the ground surface does not have to comply with the ASTM F 1951-99 standard for accessible surfaces unless the cost of providing an accessible surface is less than 20 percent of the cost of the alterations to the play components.

If the entire ground surface of an existing play area is replaced, the new ground surface must provide an accessible route to connect the required number and types of play components. The requirements for accessible routes are explained on page 19.



This play area was altered by adding two spring rockers. The seat of at least one spring rocker is between 11 inches (280mm) and 24 inches (610mm) maximum, and clear floor or ground space and maneuvering space is provided. If the ground surface is replaced in the future, an accessible route would have to be provided to the spring rocker.

Normal maintenance activities such as replacing worn ropes or topping off ground surfaces are not considered alterations.

If play components are relocated in an existing play area to create safe use zones, the guidelines do not apply, provided that the ground surface is not changed or extended for more than one use zone.

Replacing the entire ground surface does not require the addition of more play components.



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ACKNOWLEDGEMENTS

The Access Board would like to thank the following manufacturers for their generous assistance and for supplying appropriate photographs or illustrations: Bob Leathers, Columbia Cascade, GameTime, KOMPAN, Landscape Structures, Little Tikes, Miracle, Olympic Recreation, Playworld Systems, and Recreation Creations.

The numerical listing below shows the source of each photo or illustration.

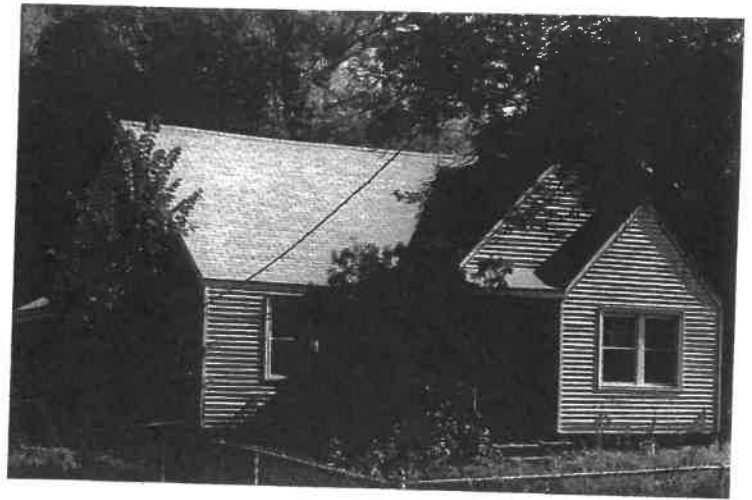
- | | |
|------------------------------|--------------------------|
| Top Cover Photo - KOMPAN | 38. KOMPAN |
| Bottom Cover Photo - Miracle | 39. KOMPAN |
| 1. KOMPAN | 40. GameTime |
| 2. Little Tikes | 41. GameTime |
| 3. KOMPAN | 42. GameTime |
| 4. KOMPAN | 43. Playworld Systems |
| 5. KOMPAN | 44. Landscape Structures |
| 6. Little Tikes | 45. Miracle |
| 7. KOMPAN | 46. Landscape Structures |
| 8. Little Tikes | 47. Little Tikes |
| 9. KOMPAN | 48. Landscape Structures |
| 10. KOMPAN | 49. KOMPAN |
| 11. Landscape Structures | 50. Game Time |
| 12. Miracle | 51. Recreation Creations |
| 13. KOMPAN | 52. Miracle |
| 14. Little Tikes | 53. KOMPAN |
| 15. GameTime | 54. Playworld Systems |
| 16. Playworld Systems | 55. KOMPAN |
| 17. GameTime | 56. KOMPAN |
| 18. Little Tikes | 57. KOMPAN |
| 19. Landscape Structures | 58. Olympic Recreation |
| 20. Miracle | 59. Playworld Systems |
| 21. Recreation Creations | 60. KOMPAN |
| 22. Miracle | 61. KOMPAN |
| 23. Miracle | 62. Access Board |
| 24. Landscape Structures | 63. Playworld Systems |
| 25. Miracle | 64. Little Tikes |
| 26. Columbia Cascade | 65. Landscape Structures |
| 27. Playworld Systems | 66. GameTime |
| 28. GameTime | 67. Playworld Systems |
| 29. KOMPAN | 68. Landscape Structures |
| 30. Elizabeth Garufi | 69. Bob Leathers |
| 31. Little Tikes | 70. KOMPAN |
| 32. Playworld Systems | 71. KOMPAN |
| 33. KOMPAN | 72. Miracle |
| 34. Columbia Cascade | 73. GameTime |
| 35. KOMPAN | 74. Access Board |
| 36. KOMPAN | 75. Miracle |
| 37. Little Tikes | |



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Appendix I: Housing Data Summary Sheets

Property Location: 256 No. Main Street
No. of Buildings: 1
No. of Units: 1
Accessible Units 0
Housing Type: 1½-story colonial
Year Built: 1938



Property Location: 47 Riverlin Street
No. of Buildings: 1
No. of Units: 1
Accessible Units 0
Housing Type: 1-story ranch
Year Built: 1955



Property Location: 7 Waters Street
No. of Buildings: 1
No. of Units: 1
Accessible Units 0
Housing Type: 2-story farmhouse
Year Built: Est. 1900



Property Location: Memorial Drive
No. of Buildings: 25
No. of Units: 25
Accessible Units 0
Housing Type: 1½-story cape(s)
Year Built: 1950-60



Property Location: 230 West Main Street
No. of Buildings: 1
No. of Units: 2
Accessible Units 0
Housing Type: 2-story garison
Year Built: 1970



Property Location: 21 Forest Drive
No. of Buildings: 1
No. of Units: 2
Accessible Units 0
Housing Type: 1½-story cape
Year Built: 1963



Property Location: 9-13 Burbank Street
No. of Buildings: 3
No. of Units: 6
Accessible Units 0
Housing Type: 2-story colonial
Year Built: 1985



Property Location: 2 Pearl Street
No. of Buildings: 4
No. of Units: 32
Accessible Units 0
Housing Type: 2-story apartment
Year Built: 1960



Property Location: Colonial Drive
No. of Buildings: 5
Accessible Units 0
No. of Units: 60
Housing Type: 3-story apartment
Year Built: 1974



Property Location: 95 Elm Street
No. of Buildings: 1
No. of Units: 54
Accessible Units 3
Housing Type: 4-story apartment.
Year Built: 1980



Property Location: 10 Colonial Drive
No. of Buildings: 1
No. of Units: 5 (23 bedrooms)
Accessible Units 1 (4 adaptable)
Housing Type: 2-story building
Year Built: 1989



Property Location: Canal St.(Cordis Mills)
No. of Buildings: 1
No. of Units: 112
Accessible Units 6
Housing Type: 3-story building
Year Built: 1900 (2004 renov.)

