

**Town of Millbury
Self-Evaluation and Transition Plan
June 2023**



Prepared by:
Center for Living & Working, Inc.
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and
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188 Lower Westfield Road, Holyoke, MA 01040

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Disclaimer: This Self-Evaluation and Transition Plan is a “planning” document which is intended to identify areas of non compliance under the Federal Americans with Disabilities Act as it pertains to the provision of services, programs, and activities. In doing so, this Plan provides an evaluation of policies and procedures and provides recommendations and sample documents for compliance. This Plan also includes a facilities assessment to identify non-conforming building and site conditions including a description and applicable regulatory standards for compliance. This is not an engineering or architectural assessment nor does it provide engineering or design solutions. Construction solutions need to be designed by a qualified engineering or architectural professional in order to ensure compliance under the MAAB 521 CMR requirements and the 2010 ADA Standards for Accessible Design.

TOWN OF MILLBURY – SELF-EVALUATION AND TRANSITION PLAN

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I. INTRODUCTION

The Center for Living & Working, Inc. in partnership with James M. Mazik, AICP – Consulting Services has prepared this Self-evaluation and Transition Plan (“Accessibility Plan” hereafter) on behalf of the Town of Millbury to determine its level of compliance under the Americans with Disability Act (ADA) of 1991, as amended in 2008 and 2010.

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. The ADA provides civil rights protections to those with disabilities in a manner similar to that provided to individuals on the basis of race, color, sex, natural origin, age, and religion. The law is intended to ensure that those with a disability cannot be excluded from participating in, or denied the benefits of programs, services and activities offered by state and local governments because of that disability.

Under Title II of the ADA, as amended, requires local municipalities to conduct a Self-Evaluation of programs and services as well as an evaluation of all facilities to document physical barriers to access as part of the requirements for developing a Transition Plan.

In Massachusetts, public buildings and facilities must adhere to Section 521 of the Code of Massachusetts Regulations, “521 CMR: Architectural Access Board”, a specialized section of the State Building Code as governed by the Massachusetts Architectural Access Board (M.G.L. c.22, S13A).

This ADA Self-evaluation and Transition Plan (“Accessibility Plan” hereafter) includes model policies and procedures for adoption by the Town as well as barrier removal solutions for the Town’s public buildings and facilities. The assessment of physical barriers and subsequent recommendations are based on the current 2010 ADA Standards for Accessible Design (2010 ADA Standards) and MA State Building Code 521 C.M.R., the higher standard to prevail. Although there are exceptions and variations (described below), this Accessibility Plan and its recommendations are based on compliance with the current Federal and State standards and the measures required to do so.

II. AMERICANS WITH DISABILITIES ACT

Background

On July 26, 1990 President George H. W. 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 including the Civil Rights act of 1964 and 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. cities and 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 municipalities must perform a self-evaluation of its policies, practices, programs, procedures, services, etc. (including communication) to determine compliance under the ADA. Municipalities 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 ensure 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.

The 2008 Amendments to the ADA broadened the definition of "disability", thereby extending the ADA's protections to a greater number of people. The 2008 Amendments provided examples which limit "major life activities" including, but not limited to, "caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, and working" as well as the operation of several specified major bodily functions. The Amendments also stated that when determining whether one qualifies as disabled, one cannot take into account the mitigating effects of assistive devices, auxiliary aids, accommodations, medical therapies, and supplies. In order to be protected under the ADA, an individual with a disability must also be qualified to perform the essential functions of a job with or without a reasonable accommodation. In 2010, the Department of Justice has revised regulations for Titles II and III of the ADA of 1990. These regulations adopted revised, enforceable accessibility standards called the 2010 ADA Standards for Accessible Design. On March 15, 2012, compliance with the 2010 Standards was required for new construction and alterations under Titles II and III. March 15, 2012, is also the compliance date for using the 2010 Standards for program accessibility and barrier removal. The 1991 ADA Standards for Accessible Design could be used for new construction and alterations under Titles II and III until March 14, 2012.

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 persons, may be deemed reasonable for an employer of

twenty-five persons. Legal counsel should always be consulted when a reasonable accommodation is being considered to ensure compliance with law.

Title II

Program Accessibility

Title II is divided into two parts. Subtitle A covers all programs, services, and activities of state and local government. Subtitle B contains requirements for public transportation systems such as regional transit authorities. If the town provides senior or other local bus or van transportation services, then compliance with applicable provisions of Title II for wheelchair users or individuals with ambulatory limitations may be required. The following applies to Subtitle A of Title II.

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 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 be 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.

Transportation services provided by the Council on Aging would also be bound by Title III.

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 paying 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.

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. To be protected under the ADA, a person must have, have a record of, or be regarded as having a record of, a substantial impairment. A substantial impairment is one that significantly limits or restricts a major life activity such as hearing, seeing, speaking, breathing, performing manual tasks, walking, caring for oneself, learning 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 individuals with disabilities, 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.

Essential Functions – the basic job duties that an employee must perform, with or without reasonable accommodation.

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 is 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 that 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.

Programmatic Access –Programmatic access requires that a public entity shall operate each service, program, or activity so that the service, program, or activity, when viewed in its entirety, is readily accessible to and usable by individuals with disabilities.

Program Accessibility

Under Title II of the ADA, the Town of Millbury must ensure that when “viewed in entirety”; all programs, services, and activities that are offered must be equally available to persons with disabilities. The Town is not necessarily required to remove architectural barriers from a building or site, but rather, must make sure that its programs are accessible. Non-structural methods to achieve program accessibility include:

- relocating a program or service to an accessible location in the existing building or facility, or
- relocation of a program or service to a different building or facility, or
- providing short-term or intermediate modifications to ensure program access until a permanent or structural solution is achieved (Example – creating an accessible meeting space on the first floor of a building such that staff providing services on a second or third floor can meet with persons in the accessible first floor space).

III. OTHER FEDERAL ACCESSIBILITY 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

The 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.

Section 504 of the Rehabilitation Act and ADA. Both the ADA and Section 504 ensure that people with disabilities are not discriminated because of their disability.

The ADA was modeled after Section 504 and adds to the strength of Section 504 by extending it to private institutions, workplaces and other institutions that were not originally covered under Section 504.

Section 504 only applies to entities that receive financial assistance. The ADA applies to entities which receive funds from federal, state, or privately owned establishments and businesses. In effect, the ADA extends a legal mandate of Section 504 beyond the recipients of the funds from the federal government.

According to Section 504, a person with disability is one who has (1) a physical or mental impairment that substantially limits major life functions (2) a history of impairment (3) or if s/he is regarded as having an impairment. However, ADA also covers HIV and contagious and non-contagious diseases.

Both the ADA and section 504 are civil rights statutes. The Office for Civil Rights of the United States Department of Education is responsible for enforcing Section 504. The United States Department of Justice enforces the Americans with Disabilities Act.

Unlike Section 504, the ADA does not have any direct responsibility for providing free and appropriate public education. The ADA does not come up with any specific evaluation or placement procedures, whereas Section 504 requires a notice and consent for an evaluation process.

Section 508 of the Rehabilitation Act and ADA. Section 508 of the Rehabilitation Act, as amended by the Workforce Investment Act of 1998, requires federal agencies to develop, procure, maintain and use information and communications technology (ICT) that is accessible to people with disabilities - regardless of whether or not they work for the federal government. The US Access Board established the Section 508 standards that implement the law and provides the requirements for accessibility.

Section 508 requires federal agencies to make their ICT such as technology, online training and websites accessible for everyone. This means that federal employees with disabilities are able to do their work on the accessible computers, phones and equipment in their offices, take online training or access the agency's internal website to locate needed information. Section 508 also means that a person with a disability applying for a job with the federal government or a person who is using an agency's website to get information about a program, or completing an online form has access to the same accessible information and resources available to anyone.

Information and Communications Technology (ICT) is any equipment or system that is used to create, convert, duplicate or access information and data. Examples of ICT include, but are not limited to:

Telephones, smart phones and mobile devices

- Televisions, DVD players and videotaped productions
- Internet and Intranet websites
- PDF documents
- Content on DVDs and CDs
- Online training
- Webinars and teleconferencing
- Technical support call centers
- Remote access websites and tools
- Tablet, laptop and desktop computers
- Software and operating systems
- User guides for software and tools
- Copiers, printers and fax machines

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.

Individuals with Disabilities Education Act - 1990

The Individuals with Disabilities Education Act (IDEA) is a law that ensures students with a disability to be provided with Free Appropriate Public Education (FAPE) that is tailored to their individual needs. IDEA was previously known as the Education for all Handicapped Children Act (EHA) from 1975 to 1990. In 1990 Congress reauthorized EHA and changed the title to IDEA. Overall, the goal of IDEA is to provide children with disabilities the same opportunity for education as those students who do not have a disability.

IDEA is composed of four parts, the main two being part A and part B. Part A covers the general provisions of the law; Part B covers assistance for education of all children with disabilities; Part C covers infants and toddlers with disabilities, including children from birth to age three; and Part D consists of the national support programs administered at the federal level. Each part of the law has remained largely the same since the original enactment in 1975.

In practice, IDEA is composed of six main elements that illuminate its main points. These six elements are: Individualized Education Program (IEP); Free and Appropriate Public Education (FAPE); Least Restrictive Environment (LRE); Appropriate Evaluation; Parent and Teacher Participation; and Procedural Safeguards. To go along with those six main elements, there are also a few other important components that tie into IDEA: Confidentiality of Information, Transition Services, and Discipline. Throughout the years of IDEA's being reauthorized, these components have become key concepts when learning about IDEA.

Congress reauthorized the IDEA in 2004 and most recently amended the IDEA through the Every Student Succeeds Act, in December 2015. In this Act, Congress states: *"Disability is a natural part of the human experience and in no way diminishes the right of individuals to participate in or contribute to society. Improving educational results for children with disabilities is an essential element of our national policy of ensuring equality of opportunity, full participation, independent living, and economic self-sufficiency for individuals with disabilities"*.

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 America Vote 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.

ADA and The Rehabilitation Act Enforcement and Compliance

Private parties may file lawsuits to enforce their rights under Title II of the ADA. The remedies available are the same as under Section 504 of the Rehabilitation Act. There are eight administrative agencies designated to handle complaints filed under Title II. These are:

- Department of Agriculture
- Department of Education
- Department of Health and Human Services
- Department of Housing and Urban Development
- Department of Interior
- Department of Justice
- Department of Labor
- Department of Transportation

Individuals may file a complaint with the appropriate administrative agency or with any federal agency that provides financial assistance to the program in question. Complaints may also be filed with the Department of Justice who will refer the complaint to the appropriate agency.

The address for the Department of Justice is—

- Disability Rights Section
- Civil Rights Division
- U.S. Department of Justice
- 950 Pennsylvania Avenue, NW
- Washington, D.C. 20530-0001

Complaints should be in writing, signed by the complainant or an authorized representative, and should contain the complainant's name, address, and describe the public entities discriminatory action.

The Massachusetts Commission on Disability has also taken a more active role in recent years in enforcing both MA 521 CMR and the Americans with Disabilities Act. Complaints may also be filed with the Commission on Disability who will investigate and determine the appropriate action.

The address and contact information for the Commission on Disability is:

- Massachusetts Office on Disability
- One Ashburton Place-Room 1305
- Boston, MA 02108
- Telephone No.: 617.727.7440
- Fax No.: 617.727.0965
- Website: <https://www.mass.gov/orgs/massachusetts-office-on-disability>

For technical assistance, the following can be contacted:

- Institute of Human Centered Design at <https://www.humancentereddesign.org>
- New England ADA Center at <https://www.newenglandada.org>
- Center for Living & Working, Inc. at <https://www.centerlw.org>

IV. 521 CODE OF MASSACHUSETTS REGULATIONS ARCHITECTURAL ACCESS BOARD (MGL C. 22, S. 13a)

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. 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.

A 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.

V. ALTERATIONS TO HISTORIC PROPERTIES

ADA 2010 Standards

There are exceptions for *alterations* to qualified historic buildings and facilities for *accessible* routes (206.2.1 Exception 1 and 206.2.3 Exception 7); entrances (206.4 Exception 2); and toilet facilities (213.2 Exception 2). When an entity believes that compliance with the requirements for any of these elements would threaten or destroy the historic significance of the building or facility, the entity should consult with the State Historic Preservation Officer. If the State Historic Preservation Officer agrees that compliance with the requirements for a specific element would threaten or destroy the historic significance of the building or facility, use of the exception is permitted.

Public entities have an additional obligation to achieve program *accessibility* under the Department of Justice ADA regulations (See 28 CFR 35.150). These regulations require public entities that operate historic preservation programs to give priority to methods that provide physical access to individuals with disabilities. If *alterations* to a qualified historic building or facility to achieve program *accessibility* would threaten or destroy the historic significance of the building or facility, fundamentally alter the program, or result in undue financial or administrative burdens, the Department of Justice ADA regulations allow alternative methods to be used to achieve program *accessibility*. In the case of historic preservation programs, such as an historic house museum, alternative methods include using audio-visual materials to depict portions of the house that cannot otherwise be made *accessible*. In the case of other qualified historic properties, such as an historic government office building, alternative methods include relocating programs and services to *accessible* locations. The Department of Justice ADA regulations also allow public entities to use alternative methods when altering qualified historic buildings or facilities in the rare situations where the State Historic Preservation Officer determines that it is not feasible to provide physical access using the exceptions permitted in Section 202.5 without threatening or destroying the historic significance of the building or facility. See 28 CFR 35.151(d).

Massachusetts 521 CMR

A 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 laws may be granted a variance by the Architectural Access Board to allow alternate accessibility. If a variance is requested on the basis of historical significance, then consultation with the Massachusetts Historical Commission is required in order to determine whether a building or facility is eligible for listing or listed in the National or State Register of Historic Places. The Massachusetts Historical Commission may request a copy of the proposed variance request and supporting documentation to substantiate the variance request and its effect on historic resources. A written statement from the Massachusetts Historical Commission is required with the application for a variance.

VI. ELECTRIC VEHICLE (EV) CHARGING STATIONS

Although neither 521 CMR nor the 2010 ADA Standards specifically address EV charging stations, the Massachusetts Architectural Access Board (AAB) has issued an advisory opinion on this matter and the U.S. Department of Energy (DOE) has issued guidance on complying with ADA requirements as it pertains to EV charging station installation. *Please note that AAB and Federal guidance pertaining to clear widths and reach range vary according to the respective regulation or standard. The stricter of the two would apply.*

Massachusetts Architectural Access Board

The AAB's advisory opinion was in response to the number of "accessible" EV chargers required at public places of assembly as specified in 521 CMR 14.1. The AAB noted that although EV charging stations do not have to be reserved for persons with disabilities, stations should comply with 521 CMR 6.00 (Space Allowance and Reach Range), 521 CMR 20.00 (Accessible Route), and 521 CMR 39.00 (Controls). The AAB also noted that strict enforcement of its regulations with respect to EV charging stations may result in excessive and unreasonable costs without substantial benefit to persons with disabilities. Therefore, variance requests would not only be considered, but in fact, encouraged. However, the AAB noted that in considering such requests, reduced compliance would be more in terms of requiring only 5%, but not less than one (1) EV charging station to be accessible. The AAB further noted that all variance requests would be viewed upon on a case-by-case basis.

U.S. Department of Energy

In formally issued guidance, the DOE notes that although the ADA does not provide design standards for EV charging stations, several industry studies and EV planning guides do. In addition, several plans developed under the DOE's Clean Cities EV Community Readiness projects describe best practices for installing ADA compliant charging stations. When designing EV charging stations, accessibility considerations should include ease of use, adequate space for exiting and entering the vehicle, unobstructed access to the charging station, free movement around the charging station and connection point to the vehicle, as well as clear paths and close proximity to any building entrances. Specific guidance and recommendations are as follows:

Parking Stall	Minimum 10 feet (car) to 13 feet (van) wide
Accessible Route Width	Minimum 3 feet' wide on both sides of the vehicle space that connects To the charging station (4 feet under 521 CMR) as well as in front of the charging station (2.5 feet x 4 feet under 521 CMR)
Slopes	No more than 2% in all directions
Reach Range	No more than 4 feet above ground level
Controls	Operable with one hand and not requiring grasping, pinching, or twisting of the wrist and no more than 5 lbs. of operating force
Other Considerations	Provide bollards or curb stops to prevent vehicle obstruction of the accessible clear space in front of the charging station

VII. EMERGENCY PREPAREDNESS

Ensuring that local government emergency preparedness and response programs are accessible to people with disabilities is a critical component and requirement of the Americans with Disabilities Act.

The municipality's designated staff or department responsible for emergency planning or response activities, should involve people with disabilities in identifying needs and evaluating effective emergency management practices. Issues that have the greatest impact on people with disabilities include:

- notification
- evacuation
- emergency transportation
- sheltering
- access to medications, refrigeration, and back-up power
- access to their mobility devices or service animals while in transit or at shelters; and,
- access to information.

Notification

In planning for emergency services, the municipality should consider the needs of people who use mobility aids such as wheelchairs, scooters, walkers, canes or crutches, or people who have limited stamina. Plans also need to include people who use oxygen or respirators, people who are blind or who have low vision, people who are deaf or hard of hearing, people who have a cognitive disability, people with mental illness, and those with other types of disabilities. Many traditional emergency notification methods are not accessible to or usable by people with disabilities. People who are deaf or hard of hearing cannot hear radio, television, sirens, or other audible alerts. Those who are blind or who have low vision may not be aware of visual cues, such as flashing lights. Warning methods should be developed to ensure that all citizens will have the information necessary to make sound decisions and take appropriate, responsible action. Often, using a combination of methods will be more effective than relying on one method alone. For instance, combining visual and audible alerts will reach a greater audience than either method would by itself.

Provide ways to inform people who are deaf or hard of hearing of an impending disaster if the municipality uses emergency warning systems such as sirens or other audible alerts. When the electric power supply is affected, it may be necessary to use several forms of notification. These might include the use of telephone calls, auto-dialed TTY (teletypewriter) messages, text messaging, E-mails, and even direct door-to-door contact with pre-registered individuals. Also, the municipality should consider using open-captioning on local TV stations in addition to incorporating other innovative uses of technology into such procedures, as well as lower-tech options such as dispatching qualified sign language interpreters to assist in broadcasting emergency information provided to the media

Evacuation

Individuals with disabilities will face a variety of challenges in evacuating, depending on the nature of the emergency. People with a mobility disability may need assistance leaving a building without a working elevator. Individuals who are blind or who have limited vision may no longer be able to independently use traditional orientation and navigation methods. An individual who is deaf may be trapped somewhere unable to communicate with anyone because the only communication device relies

on voice. Procedures should be in place to ensure that people with disabilities can evacuate the physical area in a variety of conditions and with or without assistance. The municipality should adopt policies to ensure that its community evacuation plans enable people with disabilities, including those who have mobility, vision, hearing, or cognitive disabilities, mental illness, or other disabilities, to safely self-evacuate or to be evacuated by others. Some communities are instituting voluntary, confidential registries of persons with disabilities who may need individualized evacuation assistance or notification. If this municipality opts to maintain such a registry, have procedures in place to ensure its voluntariness, guarantee confidentiality controls, and develop a process to update the registry. Also consider how best to publicize its availability. Whether or not a registry is used, the plan should address accessible transportation needs for people who use wheelchairs, scooters, or other mobility aids as well as people who are blind or who have low vision.

The municipality should also identify accessible modes of transportation that may be available to help evacuate people with disabilities during an emergency. For instance, some communities have used lift-equipped school or transit buses to evacuate people who use wheelchairs during floods. Both public and private transportation may be disrupted due to overcrowding, because of blocked streets and sidewalks, or because the system is not functioning at all. The movement of people during an evacuation is critical, but many people with disabilities cannot use traditional, inaccessible transportation.

Sheltering

The municipality should survey its shelters for barriers to access for persons with disabilities. For instance, if a particular high school gymnasium is being considered as part of a sheltering plan, early in the process the municipality should examine its parking, the path to the gymnasium, and the toilets serving the gymnasium to make sure they are accessible to people with disabilities. When disasters occur, people are often provided safe refuge in temporary shelters. Some may be located in schools, office buildings, tents, or other areas. Historically, great attention has been paid to ensuring that those shelters are well stocked with basic necessities such as food, water, and blankets. However, many of these shelters have not been accessible to people with disabilities. Individuals using a wheelchair or scooter have often been able somehow to get to the shelter, only to find no accessible entrance, accessible toilet, or accessible shelter area. Until all emergency shelters have accessible parking, exterior routes, entrances, interior routes to the shelter area, and toilet rooms serving the shelter area; the municipality should identify and widely publicize to the public, including persons with disabilities and the organizations that serve them, the locations of the most accessible emergency shelters.

Shelter staff and volunteers are often trained in first aid or other areas critical to the delivery of emergency services, but many have little, if any, familiarity with the needs of people with disabilities. In some instances, people with disabilities have been turned away from shelters because of volunteers' lack of confidence regarding the shelter's ability to meet their needs. Generally, people with disabilities may not be segregated or told to go to "special" shelters designated for their use. They should ordinarily be allowed to attend the same shelters as their neighbors and coworkers.

Consider inviting representatives of group homes and other people with disabilities to meet with the municipality as part of its routine shelter planning. Discuss with them which shelters they would be more likely to use in the event of an emergency and what, if any, disability-related concerns they may have while sheltering. Develop site-specific instructions for volunteers and staff to address these concerns.

Access to Medications, Refrigeration, and Back-up Power

Individuals whose disabilities require medications, such as certain types of insulin that require constant refrigeration, may find that many shelters do not provide refrigerators or ice-packed coolers. Individuals who use life support systems and other devices rely on electricity to function and stay alive and, in many cases, may not have access to a generator or other source of electricity within a shelter. Ensure that a reasonable number of emergency shelters have back-up generators and a way to keep medications refrigerated (such as a refrigerator or a cooler with ice). These shelters should be made available on a priority basis to people whose disabilities require access to electricity and refrigeration, for example, for using life-sustaining medical devices, providing power to motorized wheelchairs, and preserving certain medications, such as insulin, that require refrigeration. The public should be routinely notified about the location of these shelters. In addition, if the municipality chooses to maintain a confidential registry of individuals needing transportation assistance, this registry could also record those who would be in need of particular medications. This will facilitate planning priorities.

Access to Mobility Devices or Service Animals While in Transit or at Shelters

Many shelters have a “no pets” policy and some mistakenly apply this policy to exclude service animals such as guide dogs for people who are blind, hearing dogs for people who are deaf, or dogs that pull wheelchairs or retrieve dropped objects. When people with disabilities who use service animals are told that their animals cannot enter the shelter, they are forced to choose between safety and abandoning a highly trained animal that accompanies them everywhere and allows them to function independently. Adopt procedures to ensure that people with disabilities who use service animals are not separated from their service animals when sheltering during an emergency, even if pets are normally prohibited in shelters. While a municipality cannot unnecessarily segregate persons who use service animals from others, the municipality may consider the potential presence of persons who, for safety or health reasons, should not be with certain types of animals.

Access to Information

People who are deaf or hard of hearing may not have access to audible information routinely made available to people in the temporary shelters. Individuals who are blind or who have low vision will not be able to use printed notices, advisories, or other written information. Adopt procedures to provide accessible communication for people who are deaf or hard of hearing and for people with severe speech disabilities. Train staff on the basic procedures for providing accessible communication, including exchanging notes or posting written announcements to go with spoken announcements. Train staff to read printed information, upon request, to persons who are blind or who have low vision.

Leaving the Shelter and Returning Home

The needs of individuals with disabilities should be considered as well when they leave a shelter or are otherwise allowed to return to their home. If a ramp has been destroyed, an individual with a mobility impairment will be unable to get into and out of the house. In case temporary housing is needed past the stay at the shelter, the municipality’s emergency response plan could identify available physically accessible short-term housing, as well as housing with appropriate communication devices, such as TTY’s, to ensure individuals with communication disabilities can communicate with family, friends, and medical professionals. Identify temporary accessible housing (such as accessible hotel rooms within the community or in nearby communities) that could be used if people with disabilities cannot immediately return home after a disaster if, for instance, necessary accessible features such as ramps or electrical systems have been damaged.

VIII. ADA SERVICE ANIMALS

Beginning on March 15, 2011, only dogs are recognized as service animals under Titles II and III of the ADA. A service animal is a dog that is individually trained to do work or perform tasks for a person with a disability. Generally, Title II and Title III entities must permit service animals to accompany people with disabilities in all areas where members of the public are allowed to go.

Definition of Service Animal

Service animals are defined as dogs that are individually trained to do work or perform tasks for people with disabilities. Examples of such work or tasks include guiding people who are blind, alerting people who are deaf, pulling a wheelchair, alerting and protecting a person who is having a seizure, reminding a person with mental illness to take prescribed medications, calming a person with Post Traumatic Stress Disorder (PTSD) during an anxiety attack, or performing other duties. Service animals are working animals, not pets. The work or task a dog has been trained to provide must be directly related to the person's disability.

Dogs whose sole function is to provide comfort or emotional support do not qualify as service animals under the ADA. Emotional support animals, comfort animals, and therapy dogs are not service animals under Title II and Title III of the ADA. Other species of animals, whether wild or domestic, trained or untrained, are not considered service animals either. Emotional support animals are different than service animals as they are trained to follow basic commands, but unlike service animals, are not trained for a specific task to assist a person with a disability. It does not matter if a person has a note from a doctor that states that the person has a disability and needs to have the animal for emotional support. A doctor's letter does not turn an animal into a service animal. People with emotional support animals might not have any physical disabilities or outward signs of why they need an emotional support animal. As emotional support animals are not covered by the ADA, they are not allowed in public places such as restaurants and stores.

This definition does not affect or limit the broader definition of "assistance animal" under the Fair Housing Act or the broader definition of "service animal" under the Air Carrier Access Act. Some State and local laws also define service animal more broadly than the ADA does. Information about such laws can be obtained from the MA State Attorney General's Office.

Where Service Animals Are Allowed

Under the ADA, State and local governments, businesses, and nonprofit organizations that serve the public generally must allow service animals to accompany people with disabilities in all areas of the facility where the public is allowed to go. For example, in a hospital it usually would be inappropriate to exclude a service animal from areas such as patient rooms, clinics, cafeterias, or examination rooms. However, it may be appropriate to exclude a service animal from operating rooms or burn units where the animal's presence may compromise a sterile environment.

Service Animals Must Be Under Control

A service animal must be under the control of its handler. Under the ADA, service animals must be harnessed, leashed, or tethered, unless the individual's disability prevents using these devices or these devices interfere with the service animal's safe, effective performance of tasks. In that case, the individual must maintain control of the animal through voice, signal, or other effective controls.

Inquiries, Exclusions, Charges, and Other Specific Rules Related to Service Animals

- When it is not obvious what service an animal provides, only limited inquiries are allowed. Staff may ask two questions: (1) is the dog a service animal required because of a disability, and (2) what work or task has the dog been trained to perform. Staff cannot ask about the person's disability, require medical documentation, require a special identification card or training documentation for the dog, or ask that the dog demonstrate its ability to perform the work or task.
- Allergies and fear of dogs are not valid reasons for denying access or refusing service to people using service animals. When a person who is allergic to dog dander and a person who uses a service animal must spend time in the same room or facility, for example, in a school classroom or at a homeless shelter, they both should be accommodated by assigning them, if possible, to different locations within the room or different rooms in the facility.
- A person with a disability cannot be asked to remove his service animal from the premises unless: (1) the dog is out of control and the handler does not take effective action to control it or (2) the dog is not housebroken. When there is a legitimate reason to ask that a service animal be removed, staff must offer the person with the disability the opportunity to obtain goods or services without the animal's presence.
- Establishments that sell or prepare food must generally allow service animals in public areas even if state or local health codes prohibit animals on the premises.
- People with disabilities who use service animals cannot be isolated from other patrons, treated less favorably than other patrons, or charged fees that are not charged to other patrons without animals. In addition, if a business requires a deposit or fee to be paid by patrons with pets, it must waive the charge for service animals.
- If a business such as a hotel normally charges guests for damage that they cause, a customer with a disability may also be charged for damage caused by himself or his service animal.
- Staff are not required to provide care for or supervision of a service animal.

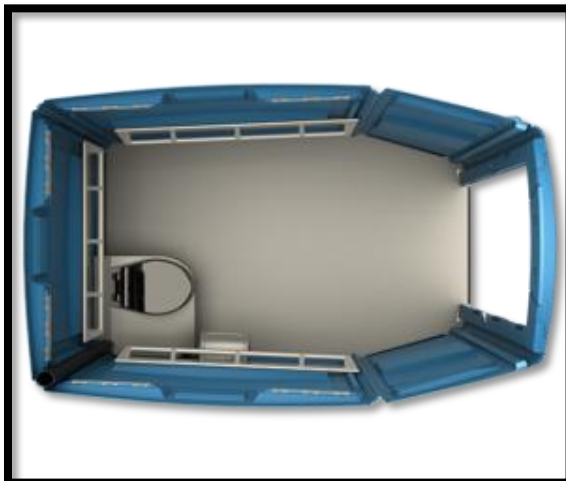
Miniature Horses

In addition to the provisions about service dogs, the Federal Department of Justice's ADA regulations have a separate provision about miniature horses that have been individually trained to do work or perform tasks for people with disabilities. (Miniature horses generally range in height from 24 inches to 34 inches measured to the shoulders and generally weigh between 70 and 100 pounds.) Entities covered by the ADA must modify their policies to permit miniature horses where reasonable. The regulations set out four assessment factors to assist entities in determining whether miniature horses can be accommodated in their facility. The assessment factors are (1) whether the miniature horse is housebroken; (2) whether the miniature horse is under the owner's control; (3) whether the facility can accommodate the miniature horse's type, size, and weight; and (4) whether the miniature horse's presence will not compromise legitimate safety requirements necessary for safe operation of the facility.

IX. ADA COMPLIANT PORTABLE TOILETS

If the Town provides portable toilets for short-term events or for seasonal use, then they must be “ADA Compliant”. **An important distinction to note is that “ADA Compliant” is not synonymous with “Wheelchair Accessible.”** Wheelchair Accessible usually indicates a ramped or ground level entrance with a wide enough door for a wheelchair to gain entry. Clearances; setbacks; and dispenser, grab bar, and water closet heights do not necessarily meet ADA or 521 CMR Standards. “ADA Compliant”, however, generally means reinforced construction; ramped or ground level and wheelchair accessible entrance; spring loaded magnetic door that closes automatically; reinforced grab bars; dispensers, grab bars, and the water closet at the proper height and near, far and front setbacks; compliant door hardware; and enough interior space for a wheelchair to make a 360 degree turn that all fully comply with the 2010 ADA Standards and/or 521 CMR, whichever is more stringent. Illustrative examples of an “ADA Compliant” portable toilet are shown below.

Representative Examples of an ADA Compliant Portable Toilet



X. EMERGENCY EYEWASH STATIONS

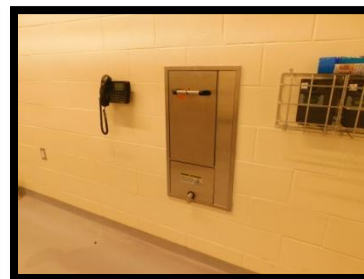
Emergency eyewash and shower equipment are often located in school science classrooms, public works and highway garages, police stations, and fire stations. These facilities should be designed to meet both the Americans with Disabilities Act (ADA) and the American National Standards Institute requirements.

These stations typically have shower pull rings that are not within reach of someone using a wheelchair and eyewash stations that are too high and lack knee clearance.

All emergency equipment must comply with ADA requirements as follow:

- Emergency showers and eyewashes should be mounted for fold-up so they are completely out of the way when not in use. For example, swing-down, sink-mounted eyewashes should be placed at the back or side of the lab sink so that the sink can be used for other operations; however, the spray should automatically start when the head is swung down into position over the sink drain.
- Signage for emergency equipment must be highly visible, even when not in use, so that it can be easily located by the disabled person.
- Sinks and counters should be 34 inches above the floor. This allows the spray outlets of the eyewash to be about 39 inches above the floor. Newer models can even be attached to swing down below the 36-inch sink height, making them easier to reach.
- The activation handles for lowering the eyewash and turning on the shower should not require more than five pounds of force to operate.
- Safety showers that meet ADA requirements must have the pull rod at or below 48 inches. This would accommodate any person using a wheelchair. The center-line of the showerhead should be 37 inches from the wall.
- When a shower/eyewash station is a combination unit, the eyewash should be about 14 inches from the wall to the center-line of the eyewash.
- ADA guidelines state that at least one out of five eyewash or shower stations in a specific area, or at least one, must meet ADA requirements.

Photographic examples of compliant emergency eyewash stations are provided below.



XI. ACCESSIBLE ROUTES AND PLAYGROUND SURFACE MATERIALS

ACCESSIBLE ROUTES OF TRAVEL

Walkways and sidewalks must be firm, stable, and slip resistant with cross slopes of no more than 2.0% and running slopes of no more than 5.0%. Transitions and surface changes must be flush or free of changes in level greater than ¼" or between ¼" and ½" if beveled. Typical surface treatments include asphalt, concrete, stone dust, and stabilized stone dust (stone dust blended with a binding agent or polymer). A new product for use in recreation areas involves compacted shredded bark/wood chips mixed with a polymer stabilizing adhesive product.

Asphalt

Estimated cost per square foot (2022): Up to \$10.00.

- Pros:
- 1) Durable
 - 2) Relatively inexpensive
 - 3) Requires little maintenance
 - 4) Does not readily deteriorate and has a longer live span
- Cons:
- 1) Is not permeable
 - 2) Subject to heaving and grass/weed infiltration in cracks
 - 3) Added cost due to site preparation requirements
 - 4) Requires periodic crack-filling and re-sealing/re-coating

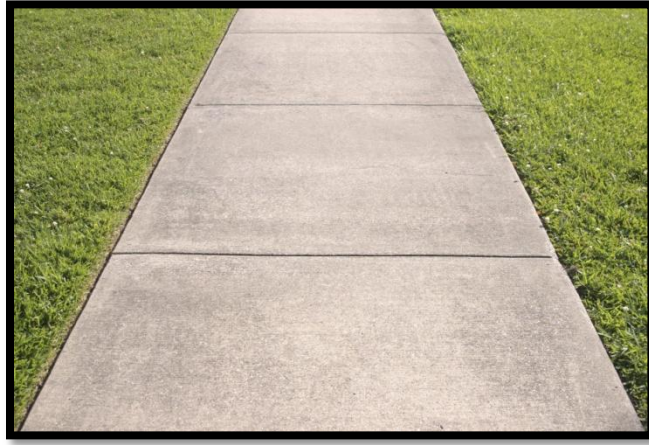


Concrete

Estimated cost per square foot (2022): Up to \$25.00.

- Pros:
- 1) Durable
 - 2) Requires little maintenance
 - 3) Does not readily deteriorate and has a longer live span
- Cons:
- 1) Is not permeable
 - 2) Subject to cracking, edge deterioration, and some heaving

- 3) Is more expensive due to site preparation and construction
- 4) Requires more expensive repair varying from grinding to complete concrete pad replacement



Stone Dust

Estimated cost per square foot (2022): Up to \$5.00.

- Pros:
- 1) Inexpensive and can be installed by municipal work force
 - 2) Permeable
- Cons:
- 1) Requires regular maintenance including the addition of material, compaction, re-grading, and weed removal
 - 2) Subject to deterioration and wash-outs especially on sloped areas
 - 3) If not installed properly and/or regularly maintained, can be problematic for wheelchair users as well as those with arm crutches due to degradation of the surface stability and firmness



Stabilized Stone Dust

Estimated cost per square foot (2022): \$7.00 to \$10.00.

- Pros:
- 1) Relatively inexpensive

- 2) Permeable
- 3) More durable than regular stone dust
- 4) Doesn't heave, weed resistant

- Cons:
- 1) Costs more than regular stone dust
 - 2) Requires metal or wood edging to preserve the integrity of the walkway and limit side erosion
 - 3) May require periodic touch up and restoration



Compacted Wood Chips/Bark Mixed with an Emulsion

Estimated cost per square foot (2022): \$7.00 to \$10.00.

- Pros:
- 1) Relatively inexpensive
 - 2) Permeable
 - 3) More durable than regular stone dust
 - 4) Doesn't heave, weed resistant
 - 5) Works on sloping surfaces

- Cons:
- 1) Costs more than regular stone dust
 - 2) Requires metal or wood edging to preserve the integrity of the walkway and limit side erosion
 - 3) May require periodic touch up and restoration



Note: Upon application the initial color of the surface is yellow, but then weathers over time to silvery gray.

PLAYGROUND SURFACE MATERIALS

There are two general options for ADA compliant playground surfaces for the fall zone area and areas other than the accessible route of travel – loose fill materials or synthetic materials. The selection of materials should be based on factors such as height of equipment to the ground fall area, age of users, dispersion of equipment, typical weather conditions, maintenance costs, installation costs, equipment life expectancy, and environmental concerns.

LOOSE FILL

All loose fill surfacing requires daily raking to maintain the required depth of the material to ensure the safety of children. Replenishment is also required as loose fill gets packed down or kicked away. Often this type of maintenance does not take place, creating unsafe playgrounds. In addition, loose fill is often tracked into buildings requiring additional maintenance indoors. Following are the most common types of loose fill:

Pea Gravel, Sand, Regular Wood Chips, and Shredded Rubber/Engineered Wood Fiber

These materials do meet compliance standards for impact attenuating surfaces (fall zone material), but they do not meet the standard for propulsion and turning requirements in the ASTM standards and are not recognized as ADA-approved materials. Other surfacing materials can be used to create paths to the entry point of the play equipment and render playgrounds compliant (See Accessible Routes of Travel above).

Pea Gravel

Pros: Pea gravel is inexpensive and easy to maintain. It also allows for good drainage and does not attract animals.

Cons: It can be a hazard if it is thrown by persons in the playground. Some daycare providers have reported that pea gravel fits well in a nostril or an ear, which can result in an unwanted visit to the doctor or emergency room. It also creates a problem for maintenance of the grass and surfaces surrounding the playground. Lawn mowers can throw the gravel significant distances. The material cannot be used if the fall height within the playground is greater than 5 feet.



Sand

Pros: Sand is a very easy product to maintain through simple raking and leveling. . It is also a preferred material to play in by children.

Cons: Cats often use the sand as a litter box which creates a serious health code concern. Broken glass and other debris can also become buried in sand, invisible to the eye, resulting in potential future injuries. Furthermore, in freezing conditions, sand can become as hard as concrete and can only be used after the sun warms the surface or the material is loosened manually. Sand cannot be used if the fall height within the playground is greater than 4 feet.



Regular Wood Chips (not engineered wood fiber)

Pros: This material is inexpensive, readily available, and easily moveable. It is typically also a good fall attenuating surface material. If properly maintained, wood chips can be used as a fall zone for play structures with a fall height up to 10 feet.

Cons: Regular wood chips require constant maintenance. They must be turned over occasionally to prevent decomposing and do not have good drainage qualities. Typically, a significant amount of the material, 25% or more, must be replaced annually.



Shredded Rubber and Engineered Wood Fiber

Pros: These products are ADA-approved for impact attenuation and are relatively cost efficient. Shredded Rubber and Engineered Wood Fiber can be used for play structures with a fall height up to 10 feet.

Cons: These materials have the potential to “off-gas” in high temperatures. They are also difficult to keep in the play areas, out of the grass, and out of children’s clothes.



FULLY ACCESSIBLE SURFACES

Pour-in-Place, Rubber Mats/Tiles

Pros: These artificial surface materials meet ADA standards and are deemed universally accessible for children with disabilities. The most significant benefit of these surfaces, other than accessibility, is that daily maintenance is usually not required to ensure that safety is maintained. Generally, relatively little effort is required to keep the surfacing materials safe and usable, in normal use zones. While products differ in quality and density, the average pour in place product can provide an ASTM safety rating for fall heights up to 12 feet.

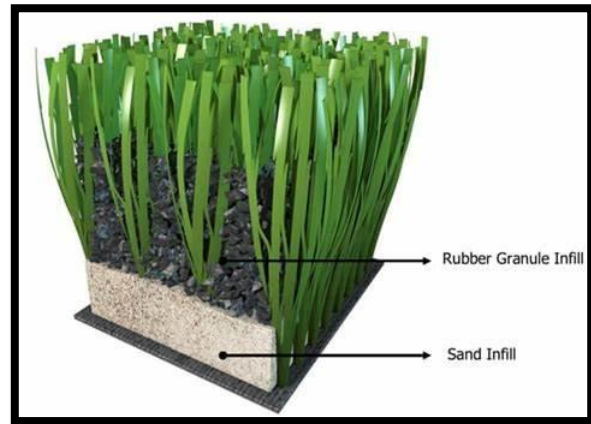
Cons: Over time tile edges may “curl”, creating a tripping hazard. Expansion between tiles also allows debris to accumulate, and the surface of the pour-in-place materials can freeze and separate. Consequently, it is difficult to patch the surface for an extended period of time. The biggest problem with these surfaces is the cost, which is significantly more than other acceptable options. In addition, severe and varying weather conditions may reduce the average life expectancy for the pour-in-place materials.



Artificial Grass with Rubber in-Fill

Pros: A properly and independently certified turf should also have a soft, consistent surface that is ADA accessible for easy wheelchair access. Since the grass won't displace like loose fill, such as sand, rubber chips, or wood chips, the safety rating is easy to maintain, even under play equipment. Artificial grass installed over a proper base can provide an ASTM safety rating for fall heights up to 12 feet.

Cons: Although artificial grass with a rubber infill is significantly more expensive than the cost of loose fill material, it is typically less expensive than pour-in-place surfaces.



Summary

All surfacing materials have advantages and disadvantages. The purchaser and the installer must ultimately assess the safety factors that will influence or the type or types of playground surfaces to be used. Among those factors are the location of the playground; drainage potential; average grade of the surrounding area; cost of installation and maintenance; life expectancy of the surface and infill materials; accessible routes to the playground; normal temperature and weather conditions; security for the playground; amount of use; age of the users; height of equipment; and amount and dispersion of accessible components. To provide a safe and accessible playground that is consistent with accessibility requirements, all of these factors should be reviewed. While expense is a primary concern for the entity or jurisdiction that is investing in a new or renovated playground, it should not be the only limiting factor, with safety, accessibility, and user integration to be equally considered.

XII. ADA SELF-EVALUATION

All municipalities must perform a self-evaluation of its policies, practices, programs, procedures, services, etc. (including communication) to determine compliance under the ADA. Municipalities 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 municipalities with less than 50 employees follow the same process to ensure 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.

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.

Under Title II of the ADA, a municipality is required to:

1. Designate a responsible employee as ADA Coordinator.
2. Adopt and distribute a Public Notice on the municipality's ADA policies and procedures.
3. Adopt, distribute and/or post an ADA Grievance Procedure.
4. Modify, maintain, and update policies, procedures, and practices, including job descriptions and hiring practices, as required.
5. Provide Reasonable Accommodations to qualified individuals with disabilities.
6. Maintain and upkeep accessible features.
7. Provide auxiliary aids and services to ensure effective communications to those with disabilities.

It is also recommended under the provisions of MGL C40 s8J that towns establish a 5 to 13 member Commission on Disability. This can be achieved through acceptance of *"the provisions of Massachusetts General Laws Chapter 40, Section 8J relative to the establishment of the municipal Commission on Disability"*.

A self-evaluation was conducted of those municipal departments that offer programs or provides services to the general public. A memo and accompanying survey form (See Appendix A) was sent to all departments, boards, commissions and individuals who were identified as either providing a service or program to area residents.

Information from each survey response, along with supplemental department information was used to develop the self-evaluation. Together with the structural assessment and policy recommendations, an accessibility compliance plan for the Town of Millbury is achieved.

Commission on Disability (MGL C40 s8J)

Massachusetts General Law Chapter 40 Section 8J gives municipalities the authority to establish commissions.

The function of a disabilities commission is to:

- Advise and assist municipal officials in ensuring compliance with federal and state disability laws;
- Review policies and activities of municipal departments and boards as they affect persons with disabilities;
- Provide information, referral, advocacy and technical assistance to individuals, businesses and organizations in all matters pertaining to disability;
- Coordinate the activities of other local groups organized to meet the needs of persons with disabilities.

Commissions consist of no less than five and no more than nine members chosen by the Board of Selectman or Town Manager (in a town) and the Mayor or City Manager (in a city). The majority must be persons with disabilities and one may be a member of the immediate family of a person with a disability. In addition, one member must be an elected or appointed municipal official.

Millbury Self-evaluation

Commissions on Disability are established by vote of Town Meeting to promote the inclusion and integration of persons with disabilities in the activities, services and employment opportunities or in the community. MGL Chapter 40 Section 8J gives municipalities the authority to establish a Commission on Disability.

The Town of Millbury has an active Commission on Disability established at Town Meeting under MGL Chapter 40 Section 8J according to the Massachusetts Office on Disability (MOD) September 2022 listing of Active Commissions on Disability in Massachusetts.

In addition, the Town Millbury Board of Selectmen established the Commission on Disabilities status under MGL Chapter 40 Section 22G enabling this Commission to collect handicap parking violation fines and distribute them at their discretion for disability related matters. This is confirmed on the MOD 2019 Listing of Commissions on Disability spreadsheet.

The current Commission members are:

Mike Kennedy; Chair
Dan Jakes; Vice Chair
Debbie Dymek; Secretary
Kent Stowe; Treasurer
Jim Clifford; Member

Recommendation

It is recommended that the Commission on Disabilities webpage be updated with the current membership. ADA related documents such as the Self-evaluation and Transition Plan, Town's Grievance Procedure; Public Notification; and related Policies, Procedures, and Practices should be included on the webpage. In addition, the name and contact information for the ADA Coordinator should be provided.

The Commission on Disability is currently putting together a comprehensive resources guide for persons with disabilities as well as for seniors that will be available on the Commission's webpage. This guide will also be available in print format for those who don't have computer or internet access and will be available at the Town Hall, Senior Center and Public Library.

ADA Coordinator (ADA Title II - 28 CFR Part 35.107 (a))

The role of the ADA Coordinator is extensive and includes:

- ensuring overall compliance with the ADA
- notification and outreach
- addressing grievances as filed under the town's established grievance policy
- ensuring 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 a municipality to successfully comply with the intent of the ADA, it is critical that its ADA Coordinator take a pro-active role in performing his or her role. It is not adequate for an 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, insuring that facilities are properly maintained, 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 persons with disabilities.

Millbury Self-evaluation

The MOD May 2022 listing of ADA Coordinators lists Town Manager Sean Hendricks as Millbury's ADA Coordinator. Mr. Hendricks confirmed this appointment via email correspondence.

Recommendation

It is recommended that the appointment and listing of this position be added to the town's website under Departments, in the Town Manager's web page, posted in the town hall, and listed in the annual report. In addition, Town Manager Sean Hendrick's name and title needs to be added to the town's Grievance Procedure.

Public Notice (ADA Title II - 35 CFR Part 35.106)

Title II of the ADA requires that public entities notify participants of its non-discrimination policies. Similarly, there should also be notification of non-discrimination policies relative to persons with disabilities in brochures and other materials provided to the public and on a town's website. All Notices should also include the ADA Coordinator's name and contact information.

Millbury Self-evaluation

A municipality must provide notice to the public about its ADA obligations and about accessible facilities and services in the town. The notice must inform the public about the ADA's nondiscrimination requirements. It may also describe how the public or employees may contact specific town officials about problems with accessibility and the need for effective communication. The information must be accessible to the public, including people who have disabilities that affect communication, such as blindness, low vision, deafness, and hearing loss.

Although no specific method is required to reach the public, the notice can be provided in more than one format and by using more than one type of media, such as the Town's website, print, radio, or television. The Town's website currently does not have any non-discrimination policies regarding residents or visitors with disabilities, nor is there anything posted on the town hall bulletin boards. The only non-discrimination policies posted on these bulletin boards pertain to employment such as being an equal opportunity employer that does include those with disabilities. Materials and publications are available in formats for the visual and learning impaired.

The Town of Millbury does include notice of non-discrimination on the basis of disability for applicable recruitment materials and publications. However, there is no consistent language pertaining to the ADA, reasonable accommodations, or non-discrimination due to a disability in job postings. The following language is from 3 separate job advertisements:

"The Town of Millbury is an Equal Opportunity Employer and does not discriminate in its admission to, access to, or operations of programs and activities on the basis of disability or any other characteristic protected under applicable federal, state, or local law."

"The Town of Millbury is an Equal Opportunity Employer. In compliance with the American with Disabilities Act, the Town will provide reasonable accommodations to qualified individuals with disability and encourage prospective employees and incumbents to discuss potential accommodations with the employer."

"Millbury Public Schools is committed to maintaining a work and learning environment free from discrimination on the basis of race, color, religion, national origin, pregnancy, gender,

sexual orientation, marital/civil union status, ancestry, place of birth, age, citizenship status, veteran status, political affiliation or disability, as defined and required by state and federal laws.”

Recommendation

It is recommended that the Town adopt a Public Notice of Non-Discrimination, which should be added to the Commission on Disability’s webpage as well as on the recommended “ADA Coordinator’s webpage” under Departments. The Notice should also be posted on the Town Hall bulletin boards. **A sample Public Notice for consideration is provided as Attachment B.**

It is also recommended that the Town adopt a Reasonable Accommodation Policy (discussed further below) and incorporate non-discrimination language, essential function requirements, and physical requirements in employment postings and job descriptions. The job postings and descriptions should have accessibility compliance language that is consistent for all positions and across all departments.

ADA Grievance Procedure (ADA Title II - 35 CFR Part 35.107 (b))

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.

Millbury Self-evaluation

The Town of Millbury has an ADA Grievance Procedure located in both page 238 of the 2020 Open Space and Recreation Plan Update as Exhibit B and in the 2006 ADA Self-Evaluation/Transition Plan in Appendix D. However, it is not clear if the Grievance Procedure was formally adopted as it is not posted on the Town’s website or in the Town Hall.

Recommendation

The Grievance Procedure should be formally adopted if it has not already been done. The Grievance Procedures should include Town Manager Sean Hendrick’s name, title, and contact information. The Grievance Procedure should also be posted on the Town’s website and in Town Hall and made available to all staff, departments, committees, and boards. **A sample Grievance Procedure is provided in Appendix C.**

Policies/Procedures/Practices (ADA Title II - 35 CFR Part 35.130 (b)(7))

A municipality should have formal separate policies and procedures pertaining to the ADA and program accessibility, grievances, communications, equal opportunity and non-discrimination except when it comes to employment opportunities.

Millbury Self-evaluation

A public entity shall make reasonable modifications in policies, practices, or procedures when the modifications are necessary to avoid discrimination on the basis of disability, unless the public entity can demonstrate that making the modifications would fundamentally alter the nature of the service, program, or activity.

The Town of Millbury does not appear to have any formal modification of programs or services policy in place. There are no policies readily available on the Town's website or in Town Hall.

Although there are no formal reasonable modifications in policies, practices and procedures readily available in place, the ADA Self-Evaluation Survey results from the department heads and committee/commission chairs show that Town staff, committees/boards, and elected officials are willing to assist residents or visitors if they request it.

Seven out of twelve ADA Self-Evaluation survey respondents answered "yes" to the question "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?" The remaining responses were either "N/A, or no policies exist".

However, two out of twelve survey responses to the question "Is the public informed that these programs/services are prepared to make reasonable modifications?" were "yes". The remainder of the responses were either "no, N/A, I don't think so, or blank."

In addition, only three out of twelve responses to the question "Does the department/program have a formal or informal process for responding to requests for modifications?" were "informal". The remainder of the responses were either "no, N/A, unknown, no requests to date or blank."

Recommendation

It is recommended that the town adopt a Reasonable Accommodation Policy (discussed further below) and incorporate non-discrimination language, essential function requirements, and physical requirements in employment postings and job descriptions.

Reasonable Accommodations (ADA Title II - 35 CFR Part 35.140 (a))

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 a 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.

Millbury Self-evaluation

Based on what was available for review, job description language and postings varied on the work environmental conditions, essential duties and responsibilities, and physical requirements. It should also be noted that if a medical examination is required, it must be required of all entering employees of the same position. Medical examinations are prohibited until after a job offer has been made to the applicant. Employment can be conditioned on the results of the applicant's post-offer medical examination. Following are more specific comments and findings.

- Two job openings posts received had AA/EOE at the bottom.
- Of the seven job descriptions received, only three of them contained the phrase:

"The Town of Millbury is and Equal Opportunity Employer. In compliance with the Americans with Disabilities Act, the Town will provide reasonable accommodations to qualified individuals with disability and encourage prospective employees and incumbents to discuss potential accommodations with the employer."

or

"Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions."

It is recommended that either phrase be included in all job descriptions. If the longer of the two phrases is to be used, change *"individuals with disability"* to *"individuals with disabilities."*

Job Descriptions. Job descriptions should use clear, concise, non-technical language. In defining essential functions, the description should focus on the outcome and not the process to achieve that outcome. For example, if a position requires lifting supplies onto a truck, the description should read, "the ability to lift supplies weighing up to 35 lbs. to a height of 4 feet and into a truck bed" and not "the ability to manually lift supplies weighing 35 lbs." It is also better to use words that describe the job requirements as opposed to words that focus on specific abilities (i.e. – hearing, speaking, walking). The following table provides preferred wording that does not restrict the physical requirements of positions.

Physical Requirements Suggested Wording

Stand or sit	Stationary position
Walk	Move, traverse
Use hands and fingers	Operate, use
Climb Stairs or ladders	Ascend, descend
See	Detect, determine, identify recognize, observe
Taste/smell	Detect, distinguish, determine
Carry/lift	Move, transport, position

Under Title II of the ADA, reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions of his/her job. **A sample Reasonable Accommodation Policy and Request Form for adoption by the Select Board is provided as Appendix D and E.**

Maintenance (ADA Title II – 28 CFR Part 35.133 (a))

A municipality 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 includes 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 automatic door opener, 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.

Millbury Self-evaluation

During the facility assessments, a number of observations were made in direct violation of Title II. This included such items as:

- Items placed in front of dispensers, operational buttons, or defibrillators restricting access or reducing clear width.
- Interior and exterior doors with excessive operating forces and closing speeds.
- Missing elements such as tactile designation signage.
- Missing protective equipment or insulation on sink plumbing.
- Sink metered faucets that do not stay open for at least 10 seconds.
- Bathroom stall doors that do not fully self-close.
- Items stored under accessible sinks restricting knee and toe depth.
- Debris such as sand and leaves accumulated at the base of curb ramps.
- Sidewalks and walkways in serious disrepair including large gaps and changes in surface level well over ¼".

Recommendation

It is recommended that facilities are inspected regularly to ensure compliance with program accessibility and to initiate repairs and related actions as required.

Effective Communication, Auxiliary Aids and Services (ADA Title II – 28 CFR Part 35.160)

Local governments must ensure effective communication with individuals with disabilities. To ensure that communications with individuals who have hearing, vision or speech impairments, municipal governments must provide appropriate auxiliary aids. The type of auxiliary aids or services 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 people who are deaf such as TDD's or video phones, use of 711 telephone interpreter service, readers, Brailled materials, documents on electronic format, audio recordings and large print materials. In addition, telephone emergency services including 911 must provide direct access to individuals with speech and 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 does not result in financial or administrative burdens yet meet the needs of the individual with a disability.

Millbury Self-evaluation

Based on what was submitted in response to the ADA Self-Evaluation survey as well as viewing policies and available materials, it is not clear as to what degree the Town complies with this provision. It does not appear that information of this type is available as part of regular meeting notices and postings and who to contact to arrange for providing accommodations.

The Town must ensure that accessibility and accommodations language appear on all meeting notices including contact information and the advance timeframe required to arrange for disability related and accommodations requests. In addition, it does not appear that the town has auxiliary aids such as TTY's, TDD's, or assistive listening systems in areas such as the Junior-Senior High School Auditorium where the annual town meetings are held, as there is no posted signage displaying their availability.

Survey results to the question "Briefly describe general office/service communications. Specifically, how is information disseminated and communicated? Are there assistive devices or auxiliary aids (i.e.. TTY, TDD, sign language interpreter) which are used or available?" were *"no, not aware of, or typical forms of communication like telephone, emails or newsletters"*.

The Police Department survey response was *"The police department's state 911 system is capable of handling calls from hearing impaired individuals. The system is also capable of receiving text messages for emergency or non-emergency purposes."*

The Millbury Public Library has the following assistive devices available:

- Part of C.W. Mars that provides access to accessible materials.
- Books on CD
- Large Print Books
- Access to the Worcester Talking Book Library

Recommendation

It is recommended that the Town of Millbury add the following to all meeting agendas: *"If you need auxiliary aids and services for effective communication (such as a sign language interpreter, an assistive listening device, or print material in digital format) or a reasonable modification in programs, services or activities contact the ADA Coordinator as soon as possible preferably at least 14 days or earlier before the activity or event."*

It is also recommended that the Town purchase an assistive listening system, preferably a portable one that can be used for meetings that are open to the public and be available as an accommodation request. The availability of assistive listening devices, including signage, should also be posted at the venues where they can be used.

Availability of assisted Listening devices signage should be posted at the venues where they can be used. See two examples below:



Virtual Meetings

In June 2020, the Massachusetts Office on Disability offered a guidance memo on "Accessible and Inclusive Virtual Trainings". The memo reinforces the basic requirement that programs, services, and activities of government, including in person and virtual meetings/presentations, must be conducted in a way that provides equivalent access unless to do so presents a fundamental alteration. Providing reasonable accommodations and effective communication are critical components to achieving equal access. The following summarizes some of the highlights and key components of this memo.

Effective Communication. Effective Communication ensures that people with vision, hearing, or speech disabilities can communicate, receive, and convey information in a manner that is accessible to them. Entities must furnish auxiliary aids when needed to communicate effectively with people who have language-based disabilities. Examples of auxiliary aids for meetings/presentations may include accessible electronic documents that can be read with assistive technology, large print documents, American Sign Language (ASL) interpreters, and Communication Access Real-time Translation (CART) services. The entity that is hosting the event is responsible for providing ASL and CART along with other needed accessibility features.

Selecting a Platform. After determining which platforms meet an entity's operational needs, the entity should consider selecting the platform that provides the highest level of accessibility. Consult with vendors and review their accessibility statements which offer insight into how various users with disabilities would interact with the platform.

Find out how the system would work with CART, an ASL interpreter, or closed captioning or if a screen reader or strictly keyboard user could access features such as screenshare, chat, and video recording. If an entity has identified a platform that meets its operational objectives but has inaccessible features the entity should determine which barriers are likely to prevent access and whether those features are critical. If the identified barriers are not critical then the entity should avoid using those features during the meeting/presentation. For those components deemed to be critical but not accessible, the entity should explore alternative ways that a participant with a disability can effectively participate in the meeting/presentation.

Presentation Materials. To the extent possible, ensure that all presentation materials are accessible to and usable for people with disabilities including those using screen readers and other assistive technologies and those requiring large print. Since users of screen readers cannot read documents through a screen share and those using magnification may find that screen share video may be distorted with increased magnification, providing these materials in advance would allow these participants to better follow the discussion in real time. Information and communication technology must be usable by people with disabilities. How-to guidance as well as references to relevant laws, regulations, and standards to help comply with this requirement can be found through the following link:

<https://wiki.state.ma.us/display/assistivetechgroup/IT+Accessibility+home>.

Additionally, the Texas Governor's Committee on People with Disabilities have created learning modules on making Microsoft Office documents accessible to people with disabilities. Access to these modules can be found through the following link: <https://gov.texas.gov/organization/disabilities/accessibledocs>.

Plan Ahead. Secure ASL interpreters and CART services in advance of the date of the meeting/presentation. These important communication services can easily be offered on a digital platform. The Massachusetts Commission for the Deaf and Hard of Hearing provides interpreting services, and the information below will help you to schedule an interpreter:

- Request ASL Interpreting or CART
 - a. Online: <https://www.mcdhh.net/request/> Choose ASL Interpreting or CART under Service Information
 - b. Phone: 617-740-1600 VOICE and 617-740-1700 TTY
- Additional information on how to request an interpreter is available at <https://www.mass.gov/how-to/request-an-interpreter>.

Keep in mind that depending on the nature of the meeting, these services might be required regardless of whether an individual has specifically requested it (e.g. public meetings where there is no registration or invitee list). In instances where participants have been invited in advance, the invitation should include a directive to notify the entity holding the meeting/presentation to identify whether they require ASL or CART to participate. This can be included in the reasonable accommodation statement provided in the meeting notice or agenda.

Best Practices

- Do a trial run. If you have already identified employees who need to use accessible features of a platform, ask them to test it with you.
- Determine which features will be used in the meeting/presentation and include details about how to use those features on the meeting/presentation invitation or reminder. For example, provide a list of commonly used shortcut keys that can be used on the platform or any specific instructions that pertain to users of assistive technology.
- When sending a meeting reminder, include the link to CART so the user can access the meeting link and the link to the CART platform in one place.
- Send out accessible meeting materials in advance.
- Become familiar with the features of the platform, including the accessible features and share them with participants. This could include providing a link to CART in the chat window, offering a brief overview of how to interact with the platform at the beginning of the meeting/presentation, and providing these types of verbal instructions for the duration as features are being utilized.
- Utilize closed captioning features when and if available.
- If the meeting/presentation will be recorded, advise attendees at the start. Inform the CART reporter in advance if you want a copy of the transcription.
- When using ASL make sure that the video remains prominently visible onscreen throughout the meeting/presentation. Depending on the platform, this may require asking participants to turn off their video to ensure that the interpreter can be seen or possibly be displayed more prominently.
- If audio quality is an issue, consider requesting that participants turn off the video feature if it is not essential to participation.
- When using screenshare or presenting materials on screen, provide a verbal explanation of what is being displayed so that those participating by phone or those who are unable to see the document or review the materials with assistive technology will be better able to follow along.
- If you are planning on using a video as part of your training or presentation curriculum then it should have audio description or the visual aspects of the video should be described before or in between the dialogue of the video by a person on the training team.

Website Accessibility (Web Content Accessibility Guidelines 2.0 AA or Section 508 Standards). Title II of the Americans with Disabilities Act requires that local governments ensure that, when viewed in their entirety, the programs, services, and activities offered are equally available to people with disabilities.

Websites of local governments are considered to be a “program” and should be accessible to the standards of the Web Content Accessibility Guidelines 2.0 AA or Section 508 Standards.

Many people with disabilities use assistive technology that enables them to use computers. Some assistive technology involves separate computer programs or devices such as screen readers, text enlargement software, and computer programs that enable people to control the computer with their voice. Other assistive technology is built into computer operating systems. For example, basic accessibility features in computer operating systems enable some people with low vision to see computer displays by simply adjusting color schemes, contrast settings, and font sizes. Operating systems enable people with limited manual dexterity to move the mouse pointer using key strokes instead of a standard mouse.

Poorly designed websites can create unnecessary barriers for people with disabilities. The following are common problems and solutions in website accessibility.

a) Images Without Text Equivalents. Persons with low vision often use screen readers and refreshable Braille displays to access information on a webpage. These technologies read text, however, they cannot translate “images” into speech or Braille. Images includes photographs, charts, color-coded information or other graphic elements on a webpage. The solution to this problem would be to add a line of HTML code to provide text for each image and graphic so that the user can understand what the image is.

b) Documents Are Not Posted In an Accessible Format. Municipalities will often post documents on their websites using Portable Document Format (PDF). However, PDF documents, or those in other image based formats, are often not accessible to blind people who use screen readers and people with low vision who use text enlargement programs or different color and font settings to read computer displays. The solution would be to always provide documents in an alternative text-based format, such as HTML or RTF (Rich Text Format), in addition to PDF. Text-based formats are the most compatible with assistive technologies.

c) Specifying Colors and Font Sizes. Websites are often designed in a manner such that everything is exactly the same color, size and layout. However, because of one’s disability, a person with low vision does not see web pages the same as other people. Some see only small portions of a computer display at one time. Others cannot see text or images that are too small. Still others can only see website content if it appears in specific colors. For these reasons, many people with low vision use specific color and font settings when they access the Internet – settings that are often very different from those most people use. For example, many people with low vision need to use high contrast settings, such as bold white or yellow letters on a black background. Others need just the opposite – bold black text on a white or yellow background. And, many must use softer, more subtle color combinations. Users need to be able to manipulate color and font settings in their web browsers and operating systems in order to make pages readable. Some web pages, however, are designed so that changing the color and font settings is impossible. The solution is to design websites so they can be viewed with the color and font sizes set in users’ web browsers and operating systems. Users with low vision must be able to specify the text and background colors as well as the font sizes needed to see webpage content.

d) Videos and Other Multimedia Lack Accessible Features. Due to increasing bandwidth and connection speeds, videos and other multimedia are becoming more common on the websites of local governments. Today, some government entities use their websites to post training videos for their

employees, feature automated slide shows of recent public events, and offer video tours of local attractions. These and other types of multimedia can present two distinct problems for people with different disabilities. People who are deaf or hard of hearing can generally see the information presented on web pages. However, a deaf person or someone who is hard of hearing may not be able to hear the audio track of a video. On the other hand, persons who are blind or have low vision are frequently unable to see the video images but can hear the audio track. The solution is to incorporate features that make them accessible to everyone. Provide audio descriptions of images (including changes in setting, gestures, and other details) to make videos accessible to people who are blind or have low vision. Provide text captions synchronized with the video images to make videos and audio tracks accessible to people who are deaf or hard of hearing.

e) Other Considerations When Developing Websites Include:

- include a “skip navigation” link at the top of web pages that allows people who use screen readers to ignore navigation links and skip directly to webpage content;
- minimize blinking, flashing, or other distracting features;
- if they must be included, ensure that moving, blinking, or auto-updating objects or pages may be paused or stopped;
- design online forms to include descriptive HTML tags that provide persons with disabilities the information they need to complete and submit the forms;
- include visual notification and transcripts if sounds automatically play;
- provide a second, static copy of pages that are auto-refreshing or that require a timed-response;
- use titles, context, and other heading structures to help users navigate complex pages or elements (such as web pages that use frames).

f) Resources and Additional Information on Website Accessibility. Additional information and guidance on website accessibility can be found on the following:

- www.w3.org/WAI/fundamentals/accessibility-intro/
- <https://webaim.org>
- www.ada.gov/pcatoolkit/chap5toolkit.htm
- www.webaccessibility.com

In addition, assistance can be obtained by contacting the MA Commission for the Blind in writing or by email, telephone, or fax as noted below:

Massachusetts Commission for the Blind
Technology for the Blind Program
John Oliveira, Deputy Commissioner
600 Washington Street –3rdFloorBoston, MA 02111
www.mass.gov/mcbJohn.Oliveira@state.ma.us
617-626-7509 Voice 617-422-0419 Fax

Millbury Self-evaluation

A visually impaired person using JAWS 2022 Screen Reading software (see [Note below](#)) was easily able to navigate the Town of Millbury's website. She stated that all links are accessible as well as the actual content. She liked how Millbury's website has important news right at the front of ITS page. According to her *"it's not necessary but really great to have the important things right there when the page is open"*.

Note: JAWS ("Job Access with Speech") is a computer screen reader program for Microsoft Windows that allows blind and visually impaired users to read the screen either with a text-to- speech output or by a refreshable Braille display. JAWS is produced by the Blind and Low Vision Group of Freedom Scientific.

The Town of Millbury uses Government Websites by CivicPlus, a software platform built for modern local governments allowing one to work seamlessly and securely, leveraging existing data and reducing information silos so a person can collaborate efficiently. It also features an online help center in the event the Town has problems with its website including accessibility requirements. CivicPlus uses the firm "AudioEye" as its ADA web accessibility provider in order to determine compliance with the Success Criteria of the Web Content Accessibility Guidelines (WCAG) 2.0 and ADA related requirements.

Best practices to ensure that the Town's website maintains its accessibility for people with various levels of visual impairments such as low vision or the need for using a screen reader include:

1. Establish, implement, and post online a policy that web pages will be accessible and create a process for implementation.
2. Ensure that all new and modified web pages and content are accessible.
 - Check the HTML of all web pages. Make sure that accessible coding is used.
 - Make sure that website is designed so it can be displayed using the color and font settings of each visitor's browser and operating system.
 - If images are used, including photos, graphics, scanned images, or image maps, make sure to include a text equivalent, by adding "alt" tags or long descriptions, for each.
 - When online forms and tables are used, make those elements accessible by labeling each control (including buttons, check boxes, drop-down menus, and text fields) with a descriptive HTML tag.
 - When posting documents on the website, always provide them in HTML or a text-based format (even if you are also providing them in another format, such as PDF).

Emergency Preparedness, Evacuation Plans, and Emergency Shelters (ADA Title II)

The Department of Justice views emergency preparedness plans as key components of a municipality's responsibility to accessibility compliance. These plans and facilities should be adapted to address the needs of those with a disability and/or who require a reasonable accommodation.

Millbury Self-evaluation. Fire Chief Steven M. Kosiba is the Emergency Management Director (EMD).

The EMD coordinates all emergency actions under the guidelines of the Millbury Comprehensive Emergency Management Plan (CEMP). This plan addresses the preparation, response, recovery, and mitigation actions for all potential risks to the public. These actions address natural disasters from tornadoes, thunderstorms and floods to hazardous material, industrial and radiological releases from the various industrial sites in and around Millbury, and civil actions to include urban terrorism and civil unrest.

The EMD conducts public information presentations, distributes emergency related literature, conducts shelter and evacuation assessments, and conducts in-service presentations as requested.

The Emergency Management Department's webpage includes links to:

- MEMA – Massachusetts Emergency Management Agency
- Emergency Preparedness Plans for home
- Power Outage Tips
- Caring for Pets in hot and cold weather

Millbury residents are able to enroll into CodeRED for emergency notification alerts. The link to enroll or make changes is located at the bottom of the Town of Millbury's website home page by calling (774) 696-9482.

Recommendation

It is recommended that the guidance provided in Chapter VII of this document be followed when developing an Emergency Management Plan and more specifically that notification and assistance to persons with disabilities be included within the plan.

Polling Places

Under the ADA, Help America Vote Act, Voting Accessibility for the Elderly and Handicapped Act, and Massachusetts General Laws, polling places are required to be accessible to persons with disabilities. This includes site access, parking, entrances, interior access, and voting equipment. In addition, registration and voting aids for the disabled and elderly are required, including information by alternative accessible means.

The Elections Division of the Secretary of the Commonwealth of Massachusetts (Elections Division) office works with each municipal clerk to ensure polling places are accessible by meeting state (and federal) regulations.

All polling locations in Massachusetts are required to be accessible and must provide access on a permanent or temporary basis on an Election Day. Voting assistance and absentee voting offer options that persons with disabilities may use to vote, but are not considered substitutes to actual accessibility to the voting location.

Both federal law and state requirements mandate that voting systems be equipped for voters with disabilities allowing such voters to have the same opportunity to vote privately and independently. It is required that every precinct must have at least one accessible voting machine available.

According to the Elections Division, there is at least one accessible marking unit in every polling place in Massachusetts. The “*AutoMARK Voter Assist Terminals*” are marking devices that use audio cue capacity for visually impaired voters. The *AutoMARK* also has a feature that will greatly magnify the ballot or display the ballot high-contrast for voters that have limited visual impairment. The *AutoMARK* can also produce an oral report to the voter as the choices selected prior to the voter printing the ballot.

Millbury Self-evaluation

According to the Town Clerk, all precinct voting occurs at the Millbury Junior-Senior High School gymnasium. Early voting takes place at the Town Hall in the large conference room.

Voting by mail and absentee ballots are also available:

The Accessible Vote by Mail (AVBM) system allows you to receive, complete, and return your ballot electronically using a secure web portal if you are unable to mark a paper ballot because of a disability. This system is compatible with screen readers.

The AVBM system is available only to voters who are unable to independently read, write, hold, or physically manipulate or mark ballots.

The Junior-Senior High School and Town Hall locations have AutoMark Voter Assist Terminals available for voters that have disabilities, including people with visual impairments that enable them to vote independently and in privacy. An AutoMARK Voter Assist Terminal is an optical scan ballot marker designed for use by people who are unable to personally mark an optical scan ballot due to physical, visual impairments or language barriers.

The AutoMARK terminal is placed in such a way that it ensures privacy to the individual voter by not having the AutoMARK screen visible to others.

XIII. ADA TRANSITION PLAN

In accordance with the ADA Standards and MA 521 CMR, an assessment of the Town of Millbury's public facilities inclusive of public buildings, active and passive recreation facilities, and schools was conducted to identify physical barriers to programs and services. This assessment or "transition plan" includes the following elements, which fulfill the requirements for the preparation of a transition plan:

- identification of physical obstacles in the building or facility that limit the accessibility of its programs or activities to persons with disabilities, and
- 2010 ADAAG and MAAB 521 CMR citation, and
- a description of methods or type of action to be taken to eliminate identified obstacles, and
- priority of removal of barrier, and
- feasibility of removal of barrier, and
- establishment of a recommended completion date to achieve accessibility, and
- general cost parameters for each action to be taken, and
- responsible party for implementation.

Limitations of the Transition Plan and Compliance

The primary obligation under Title II of the ADA is to ensure that programs and services are equally available to persons with disabilities. Municipalities are required to adhere to the 2010 Standards for Accessible Design in new construction and alterations. Programs must be relocated or access provided in inaccessible existing facilities as of the effective date of the ADA or January 26, 1992. When existing facilities comply with the 1991 Standards, there is no requirement to update to the current 2010 Standards. However, if conditions in existing facilities do not adhere to the original Standards, then the 2010 Standards must be followed.

ADA Safe Harbor: Elements in facilities built or altered before March 15, 2012 that comply with the 1991 ADA Standards for Accessible Design (1991 Standards) are not required to be modified to specifications in the 2010 Standards. For example, the 1991 Standards allow the maximum side reach of a control or dispenser to be 54 inches. The 2010 Standards lowered that side reach range to 48 inches maximum. If a control or dispenser was installed prior to March 15, 2012 with its highest operating part at 54 inches, that control or dispenser does not need to be lowered to 48 inches. Since the dispenser complies with the 1991 Standards, that Standard provides a "safe harbor".

Tolerances: Both the 2010 ADA Standards and 521 CMR allow for "tolerances as follows:

2010 ADA Standards

All dimensions are subject to conventional industry tolerances except where the requirement is stated as a range with specific minimum and maximum end points.

521 CMR

- Dimensions between zero and two inches, (0" and 2") inclusive, shall have a maximum tolerance of plus or minus one-eighth inch (1/8").
- Dimensions more than two inches and less than 36 inches (>2" and <36") shall have a maximum tolerance of plus or minus one-half inch (1/2").

- Dimensions 36 inches or greater (36" or >) shall have a maximum tolerance of plus or minus one inch (1")
- Slopes may not exceed maximums. Slopes shall be measured in two-foot increments. Tolerances do not apply to minimums or maximums.

For the purposes of this plan, unless specifically noted, facility assessments are based on the 2010 ADA Standards and 521 CMR (Massachusetts Architectural Access Board MGL. C. 22 s13A), whichever is more stringent.

The plan does not address what is accessible, but rather obstructions to mobility. Fieldwork was performed in the Spring of 2021. 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 2010 ADA Standards for Accessible Design, 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 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 (historic properties discussed elsewhere in this Plan). 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 ADA Standards. 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. In circumstances where there are differences in the compliance requirements between 521 CMR and the ADAAG, the stricter or more encompassing standard shall apply.

The Department of Justice issued 1991 Standards for Accessible Design to address physical barriers to facilities and transportation. There were technical amendments to these standards in 1994 followed by more substantive amendments in 2010 (2010 ADA Standards for Accessible Design). These 2010 Standards revised policy requirements for certain areas such as service animals. The 2010 Standards also addressed certain physical components including assembly seating, the establishment of construction tolerances for certain items and formalized standards for docks, fields, pools, and other recreational facilities.

As is the circumstance with 521 CMR of the Massachusetts State Building Code, under the Federal ADA, construction modifications for accessibility compliance is not required unless triggered by renovation and/or new construction. Municipalities must still ensure that individuals are not excluded from programs and services because buildings or facilities are inaccessible. This can be accomplished through relocating a program or service to an accessible location or other means of reasonable accommodation. For the purposes of this Transition Plan, the higher standard of compliance will be used for the purpose

of identifying obstacles and determining cost, however, descriptive alternatives will also be provided in the narrative.

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.

The plan provides a description of the obstacle which limits mobility or access, 2010 ADA Standards citation reference, MA 521 CMR citation reference, the type of action required to be taken for compliance, the priority for the action, the feasibility of undertaking the action, the timeframe for completion, a representative photo, and a general parameter of cost.

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>Priority</u>	<u>Description</u>
1	Accessible approach and entrance
2	Access to goods and services
3	Access to public toilet rooms
4	Access to other items (ie – water fountains, public telephones, etc.)

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.)

Time-frame(TF)

A recommended time-frame for removing the architectural barrier is provided as follows:

<u>Time-frame</u>	<u>Description</u>
I	Immediate Term (2023-2024)
N	Near Term (2025-2028)
L	Long Term (2029-2032)

Costs

Cost estimates are based on recent projects of similar nature, unit quantity pricing (where appropriate), and R.S. Means Company, Inc. ADA Compliance Pricing Guide 2nd Edition and updated for current pricing. 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.

Abbreviations

a.f.f.	above finish floor	c.f.s	clear floor space
s/b	should be	r.s	running slope
>	greater than	c.s.	cross slope
<	less than	o.c.	on center

XIV. MUNICIPAL BUILDING ASSESSMENTS

TOWN HALL

POLICE STATION

MILLBURY LIBRARY

SENIOR CENTER

MAIN FIRE STATION AND HEADQUARTERS

FIRE DEPARTMENT STATIONS #2, #3, AND #5

DPW HIGHWAY AND WASTE WATER PUMPING STATION

SCHOOL ADMINISTRATION BUILDING

TRANSFER STATION

GRASS HILL SCHOOL BUILDING

DOROTHY MANOR BUILDING

ASA WATERS MANSION

RAYMOND E. SHAW ELEMENTARY SCHOOL

ELMWOOD STREET SCHOOL

JUNIOR – SENIOR HIGH SCHOOL

MILLBURY TOWN HALL

Description of Facility and Programs: Millbury Town Hall is located on the main level of a 2-level building, with the Police Department being housed in the lower or basement level. The masonry building was constructed in 1973 and totals roughly 17,000 s.f., of which 8,500 s.f. houses the municipal offices. Although the main level has an on-grade front entrance with automatic door openers, there is no internal accessible route of travel between the Town Hall level and Police Department level.



Responsible Party: Board of Selectmen

General Description or Obstacle Which Limits Mobility or Access:

Parking

The designated van accessible parking lacks “van accessible” signage.

EV Charging Stations

There are two (2) EV charging stations at the rear of Town Hall. The payment slot/operating mechanisms are 6” too high with the access and reach restricted by a concrete barrier. In addition there is no access aisle to the charging station for designated wheelchair access. Additional guidance on EV Charging Stations is provided in Chapter VI of this Plan.

Front Entrance Drop Box

Although the exterior drop box near the main entrance is within reach range, the adjacent envelope holder is 10” too high.

Common Areas and General

Interior and exterior doors with closers have operating forces and closing speeds which exceed that allowed. Doors/rooms lack tactile designation signage with some doors having glass panes that are too high. A hallway defibrillator is a protruding object and is also not within reach range. In general,

hallway and office light switches are up to 2" too high. The hallway drinking fountain is "low" only. A "form holder" outside the Treasurer/Collector's Office is 10" too high.

The staff lounge has a sink/counter that is 1½" too high and lacks knee clearance. In addition, both the towel and soap dispensers are too high.

The Board of Health meeting table provides only 26" of knee clearance, which is 1" too low.

Pass-through windows at the Assessor's Office, Treasurer/Collector's Office, and Town Clerk's Office vary in height from 42½" to 44" a.f.f. As these are not considered to be "counters", they are within the maximum reach range height of 48 inches and no other action is required.

Egress Stairs

The egress stairs near the Planning/Building Department have railings that are too low and lack top and bottom extensions. The interior egress stairs by the Deputy Town Manager's Office have handrails that are located on one side only, not round or oval in shape, and lack bottom extensions. The exterior egress stairs have a railing on one side only.

Men's Bathroom

The sink piping is not wrapped, guarded, or insulated. The mirror, towel dispenser, soap dispenser, urinal, and stall door coat hook are all too high. The water closet is too close to the near wall and too close to the front of the stall. In addition, the water closet flush control is on the wrong side. The toilet paper dispenser is too close to the front of the water closet. Both of the grab bars are 10" too short.

Women's Bathroom

The sink piping is not wrapped, guarded, or insulated. The towel dispenser, soap dispenser, and stall door coat hook are all too high. The water closet is too close to the near wall and too close to the front of the stall. The toilet paper dispenser is too close to the front of the water closet. Both of the grab bars are 10" too short.

Town Hall Building Accessibility Assessment

General Description of Obstacle	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
<u>Parking</u> The van accessible parking lacks "van accessible" signage.	502.6	23.6	Provide "van accessible" signage..	1	2	I	\$25
<u>EV Charging Stations</u> There are two (2) EV charging stations at the rear of Town Hall. The payment slot/operating mechanisms are 6" too high with the access and reach restricted by a concrete barrier. In addition there is no access aisle to the charging station for designated wheelchair access. Additional guidance on EV Charging Stations is provided in Chapter VI of this Plan. See Photo TH 1.	308.2 308.3	6.5 6.6	Although EV charging stations are not specifically addressed under the 2010 ADA Standards or 521 CMR, the Massachusetts Architectural Access Board and the U.S. Department of Energy provide guidance on charging stations (See Chapter VI of this Plan). The spaces should have striping for wheelchair access. The charging stations should be modified such that they are accessible and within reach range for a wheelchair user.	2	3	I	TBD

<p><u>Exterior Envelope and Interior Forms Holder</u></p> <p>The exterior envelope holder located next to the drop box at the main entrance is 10" too high under the 2010 ADA Standards.</p> <p>The interior forms holder in the hallway next to the Treasurer/Collector's Office is 10" too high.</p> <p>See Photos TH 2 and 3.</p>	<p>308.2 308.3</p>	<p>6.5 6.6</p>	<p>Lower the holders so they are at a height of no more than 48" a.f.f.</p>	<p>4</p>	<p>2</p>	<p>I</p>	<p>\$0</p>
<p><u>Interior and Exterior Doors</u></p> <p>Interior and exterior doors with closers (including bathrooms) do not fully comply with the maximum allowed operating force for an exterior door (15 lbs.) and interior door (5 lbs.) and do not fully comply with the minimum closing speed requirement of 6 seconds under 521 CMR. Door operating forces vary up to 18 lbs. and closing speeds are as quick as 3 to 4 seconds.</p>	<p>404.2.8 404.2.9</p>	<p>26.8 26.9</p>	<p>Adjust door closers such that the push/pull force does not exceed 15 lbs for an exterior door and 5 lbs. for an interior door with door closing speeds of at least 6 seconds.</p>	<p>1, 2, 3</p>	<p>2</p>	<p>I</p>	<p>\$0</p>
<p><u>Signage</u></p> <p>The following interior doors lack tactile designation signage:</p> <p><u>Doors From Main Hallway</u></p> <ul style="list-style-type: none"> • Planning/Bldg/Conservation • Copy Room • 3 Hallway Doors behind Copy Room (both sides – 6) • Copy Room Storage • Egress door by Planning • Janitor/Maintenance Room • Door across Janitor/Maintenance • Finance Director • Men's Bathroom • Women's Bathroom • Conference Room • BOS Meeting Room (2) • Assessor's Office (2) • Side Door to Treasurer/Collector's Office • Town Clerk Office • BOS/Town Manager (2) • Deputy Town Manager/HR • Egress by Deputy Town Mgr • Janitor's Closet by BOH • BOH Office <p><u>Interior Office Doors</u></p> <ul style="list-style-type: none"> • Building Inspector Office • Planning Director Office • Finance Director Office • Pass-thru (Finance to Assessor/Collector's) • Assessor's Office • Pass-thru (Assessor's to Treasurer's/Collector's) • Treasurer's Office 	<p>703</p>	<p>41.1</p>	<p>Install accessible compliant signage on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Under 521 CMR, signage s/b 60" a.f.f to the centerline of the sign. Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).</p> <p>Bathroom signage must include the Universal of Symbol of Accessibility.</p>	<p>2</p>	<p>2</p>	<p>I</p>	<p>Up to \$2,100</p>

<ul style="list-style-type: none"> • Town Manager Storage • Town Manager Office • DPW Director's Office • Town Clerk's Office • Town Clerk Closet <p>See Photos TH 4 and 5.</p>							
<u>Door Hardware</u> The closet door in the Town Clerk's Office has non-compliant knob style hardware.	404.2	26.11	Install lever style hardware that can be operated with a closed fist or loose grip.	2	2	I	\$100
<u>Doors with Glass Panes</u> The following doors have glass panes that exceed the maximum viewing height of 43": <ul style="list-style-type: none"> • BOS Meeting Room (2 at 51½" to 51¾" a.f.f.) • Side door to Treasurer's/Collector (49¾" a.f.f.) • Assessor's Interior Office (48" a.f.f.) <p>See Photo TH 6.</p>	404.2.11	NA	Doors, gates, and side lights adjacent to doors or gates, containing panels that permit viewing through the panels shall have the bottom of at least one panel located 43 inches maximum a.f.f. Frost or block the glass panes.	2	2	N	\$0
<u>Protruding Objects</u> <ul style="list-style-type: none"> • Defibrillator near Town Clerk (7" protrusion at a height of 43" a.f.f.) Protruding objects extend more than 4" into the accessible route of travel between a height of 27" and 80" a.f.f. or have vertical headroom clearance reduced to less than 80".	307.2	20.6.1	Place a fixed object under the defibrillator or relocate so it is not on an accessible route of travel.	2	2	I	\$0
<u>Reach Range</u> The following exceed the maximum reach range height of 48" a.f.f. for an adult under the 2010 ADA Standards: <ul style="list-style-type: none"> • Defibrillator near Town Clerk (52" a.f.f. o.c.) • Hallway, office, and meeting room light switches (Up to 50½" a.f.f.) • Staff Lounge towel dispenser (57½" a.f.f.) • Staff Lounge soap dispenser (54" a.f.f.) 	308.2 308.3	6.5 6.6	Lower the defibrillator to a height of no more than 48" a.f.f. o.c. to the opening mechanism Lower the towel and soap dispensers to a height of not more than 48" a.f.f. to the operating mechanism As a result of a reasonable accommodation request, lower light switches as necessary.	2	2	I	\$0 to TBD
<u>Staff Lounge Sink</u> The staff lounge sink is 35½" a.f.f. which is 1½" too high and does not provide knee clearance. <p>See Photo TH 7.</p>	606.3 306.3	32.7	Modify the counters and sinks so that they are no more than 34" a.f.f. at the top and there is a minimum of 27" knee clearance at the sink with guarded, wrapped, or insulated piping.	4	3	N	Up to \$1,000+
<u>Desk/Table Knee Clearance</u> The Board of Health meeting table provides only 26" of knee clearance.	226.1 306.2 306.3	35	Block the table to provide the minimum required 27" knee clearance.	2	2	I	\$0
<u>Drinking Fountain</u>							

The hallway drinking fountain is a “low only” fountain.	211	36	<p>Option #1: Discontinue use of the drinking fountain.</p> <p>Option #2 – Remove the existing drinking fountain and replace with a “hi-low” drinking fountain. The drinking fountain must comply as follows:</p> <p>Protruding objects compliance of no > 4” protrusion between 27” and 80” a.f.f. (307); 30”x48” clear space requirement (305), and knee/toe clearance (306). Knee clearance is 9” to 27” a.f.f; 25” deep max. at 9” a.f.f. or 11” deep min at 9” a.f.f. and 8” deep min at 27” a.f.f. Width of knee clearance s/b 30” wide min (306.3). Toe clearance as part of c.f.s. 17” min – 25” max, 9” high a.f.f., 30” wide (306.2). The spout s/b 15” min from wall and 5” max from the front edge of the unit (602.5). Flow of water 4” high min and spout located max 5” from front (602.6). and with the water flow within 3” from the front edge (36.3). The spout height s/b 36” max. a.f.f. for “low” and 38” min a.f.f. to 43” max a.f.f. for “high”. The controls s/b operable w/one fist; no > 5 lbs force (309.4).</p>	2	3	N	Up to \$5,000+
<p>Side Egress Stairs <u>Interior Egress Stairs by Planning</u> The railings are 1” to 2” too low and lack top and bottom extensions.</p> <p><u>Interior Egress Stairs by Deputy TM/HR</u> The railings are rectangular in shape and lack compliant top and bottom extensions.</p> <p><u>Exterior Egress Stairs by Deputy TM/HR</u> Railings are provided on one side of the stairs only.</p> <p>See Photos TH 8, 9, and 10.</p>	505.4 505.10 505.4 505.10 505.7 505.2 505.3	27.4.2 27.4.3 27.4.2 27.4.3 27.4.4 27.4.5 27.4.1	<p>Replace the existing railings with ones that are between 34” – 38” a.f.f. to the top of the railing, circular or oval in x-section, 1¼” – 2” in outside diameter, and with extensions at the top (12” parallel to the ground) and bottom (slope distance one tread then 12” parallel to the ground).</p>	4	3	N	Up to \$15,000+
<p>Men’s and Women’s Bathrooms <u>Men’s and Women’s Both</u> The sink piping is not wrapped, guarded, or insulated.</p> <p>The soap and towel dispensers are 3” to 11” too high.</p> <p>The stall door coat hooks are up to 6” too high.</p> <p>The toilet paper dispensers are 1” to 5” too close to the front of the water closet.</p> <p>The side and rear grab bars are only 32” long, which are 10” too short.</p> <p>The water closets are 5½” too far from the near wall and up to 12” too close to the front of the stall.</p>	606.5 308.2 308.3 308.2 308.3 604.7 604.5 604.2 604.3	30.9.5 30.12 30.6.1 30.7.6 30.8 30.7.2	<p>Wrap guard, or insulate the piping.</p> <p>Lower the dispensers to a height of no more than 42” a.f.f. to the operating mechanism.</p> <p>Lower the coat hooks to a height of no more than 48” a.f.f.</p> <p>Relocate the toilet paper dispensers so they are a minimum of 7” and a maximum of 9” in front of the water closet measured to the centerline of the dispenser and at least 24” a.f.f. <i>Note: There also must be a at least 1½” clearance below the grab bar to the nearest object or fixture.</i></p> <p>Replace the grab bars with ones that are 42” long.</p> <p>Relocate the water closets so that they are 18” o.c. from the near wall, 42” o.c. from the far wall or nearest object, and so that there is 42” of clearance in front of the water closet. This may require a reconfiguration of the</p>	3 3 3 3 3 3	2 2 2 2 2 3	I I I I N	\$0 \$0 \$0 \$0 Up to \$500+ TBD

<u>Men's Only</u> The mirror is 8" too high. The urinal rim is 5½" too high. The water closet flush control is on the wrong side. See Photos TH 11, 12, 13, and 14.			bathrooms including removing the stall partitions and doors and converting both bathrooms to single user accessible bathrooms or converting the bathrooms to single user unisex bathrooms with one also being accessible.				
	603.3	30.11	Lower the mirror to a height of no more than 40" a.f.f. to the bottom of the reflecting surface.	3	2	I	\$0
	605.2	30.10.1	Lower the urinal such that the rim is no more than 17" a.f.f.	3	3	N	Up to \$1,000
	604.6	30.7.5	Replace the water tank or the toilet in entirety such that the flush control is on the wide or approach side.	3	2	N	\$125 to \$350

Total Up to \$25,075+

Town Hall Building Accessibility Assessment Photos

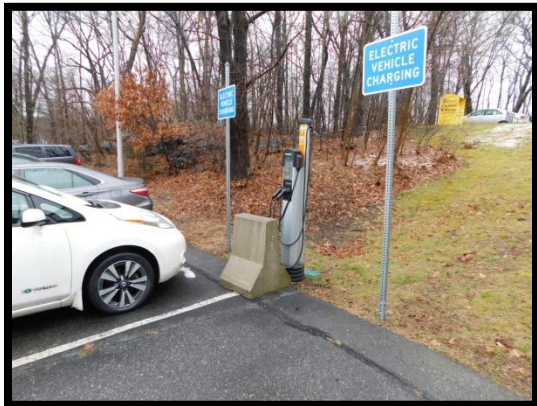


Photo TH 1

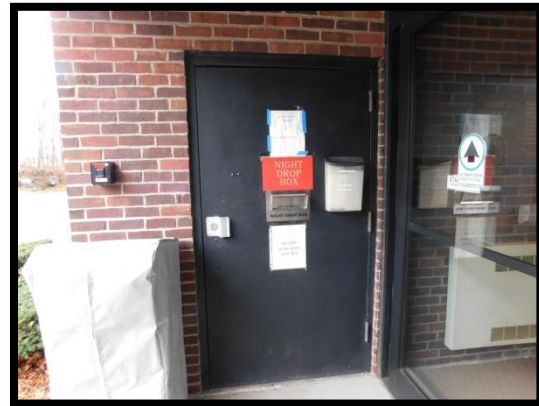


Photo TH 2



Photo TH 3

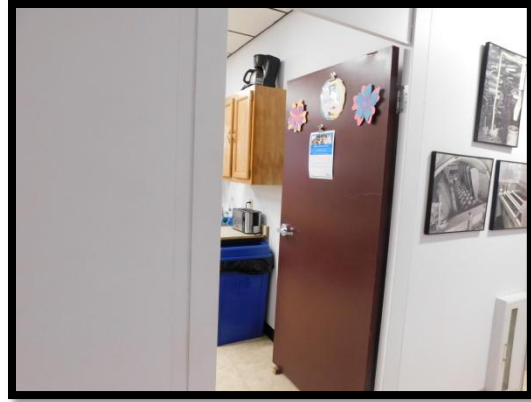


Photo TH 4



Photo TH 5



Photo TH 6



Photo TH 7



Photo TH 8



Photo TH 9



Photo TH 10



Photo TH 11



Photo TH 12



Photo TH 13

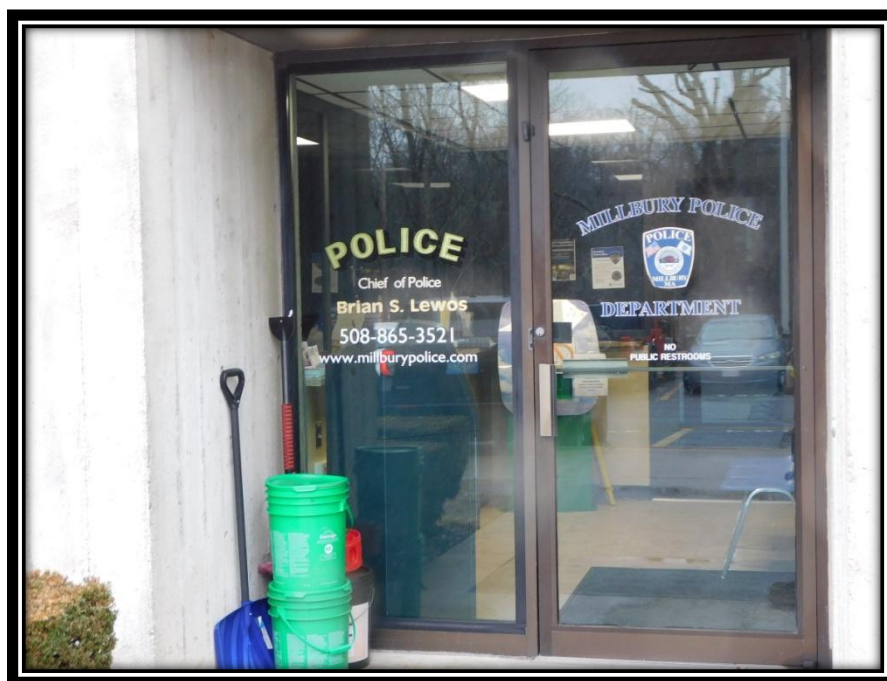


Photo TH 14

POLICE STATION

Description of Facility and Programs: The Millbury Police Station, which was constructed in 1973-74 is located in the lower level of the Millbury Town Hall. The Station houses dispatch, meeting space, offices, lockers, bathrooms, an apparatus bay, holding cells, and other spaces – most of which are not open to the public.

The Police Department currently employs approximately 28 personnel including 1 Chief, 1 Lieutenant, 2 Detectives, 4 Sergeants, 1 School Resource Officer, 14 Officers, 1 Administrative Assistant, and 4 Dispatch personnel.



Responsible Party: Board of Selectmen

General Description or Obstacle Which Limits Mobility or Access: The Police Station is minimally accessible compliant with numerous areas of non-compliance. However, “public” access is severely restricted with most areas available only to Police personnel. Areas of compliance in the building will concentrate primarily on those areas which the public has access to, areas used by civilian dispatch, and general issues concerning hardware and signage

Exterior

The designated accessible parking space has signage that is too low and lacks “van accessible” designation. The curb ramp from the parking to the walkway has an excessive running slope and lacks a top level landing. There is also a 2” abrupt change in level surface and a “gap” in the transition from asphalt to granite.

Interior - General

Doors with closers have excessive operating force and close too fast. Some doors have glass panes that are too high under the 2010 ADA Standards. Interior doors have knob-style hardware and lack tactile designation signage. A hallway drinking fountain is a non-compliant “high” only fountain that is also a protruding object. In general, light switches throughout the building vary in height up to 50” a.f.f.

Hallway Bathroom

The bathroom has a sink with piping that is not wrapped, guarded, or insulated. The sink faucets require pinching and twisting of the wrist. The dispensers and mirror are too high. The locking mechanism is not only too high, but requires pinching and twisting of the wrist. The water closet is 1½” too low, 3½” too close to the near wall, 16” too close to the far wall, and 11½” too close to the front wall.

Break Room

The break room sink/counter is 2” too high and lacks knee clearance.

Dispatch and Female Staff Bathroom

The sink piping is not wrapped or insulated. The dispensers and mirrors are too high. The water closet is 19½” too close to the far wall and 6” too close to the bathroom door. The rear grab bar is 10” too short. In addition, the coat hook is 22½” too high.

The shower lacks any accessible features. As this shower is limited to use by female officers, who must meet strict physical requirements to perform the essential functions of their job, no other action is required at the present time unless the shower is made available to civilian dispatch or as a result of a reasonable accommodation request.

Police Male Lockers/Shower and Related Areas for Police Use Only

These areas are limited to police personnel, who must meet strict physical requirements to perform the essential functions of their jobs.

Shower/Bathroom. The men’s shower lacks any accessible features and have a 2” abrupt change in level surface to enter. The sink has piping that is not wrapped or insulated and dispensers and a mirror that are too high. The bathroom has a toilet paper dispenser that is too far from the front of the water closet, side and rear grab bars that are 1” too high, and a rear grab bar that is 6” too short.

Booking Room. The booking room sink is 2” too high and lacks knee clearance. Faucets require pinching and twisting of the wrist. The soap dispenser is too high.

As no public access is allowed to these areas, unless by an accompanying officer, no further action or modifications are required. Modifications would only be necessary if these areas were made fully open to the public or as an employee reasonable accommodation request. .

Sallyport/Garage and Holding Cells

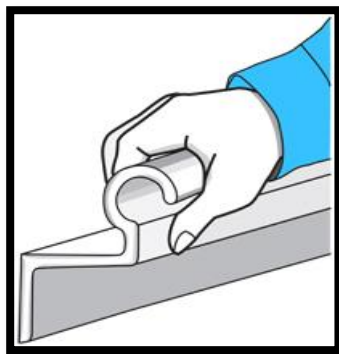
The sallyport/garage stairs have a railing on the inside only and lacks a bottom extension. There is no accessible route of travel into the station and booking area.

There are 3 male and 2 female cells, none of which are “accessible”. The water closets have rim heights that are 1½” too low and which are also 2” too close to the near wall and 4” too close to the far wall. The sinks lack knee clearance. In addition, there is only 24” of clear width into the cells, which is too narrow for a wheelchair.

Commentary on Holding Cells:

Section 232.2 of the 2010 ADAAG alterations to cells shall not be required to comply except to the extent determined by the Attorney General (federal). **Advisory 232.2:** General Holding Cells and General Housing Cells Exception. Although these requirements do not specify that cells be accessible as a consequence of an alteration, Title II of the ADA requires that each service, program, or activity conducted by a public entity, when viewed in its entirety, be readily accessible to and usable by individuals with disabilities. This requirement must be met unless doing so would fundamentally alter the nature of a service, program, or activity or would result in undue financial and administrative burdens. Inmates in local correctional facilities may have mobility disabilities and need to be housed in accessible cells. Federal laws protect people with disabilities from discrimination by State and local governments, including entities that own or operate correctional facilities. All such entities are covered by the Americans with Disabilities Act of 1990 (ADA), and those that receive Federal funds are also covered by section 504 of the Rehabilitation Act. These laws prohibit discrimination against persons with disabilities, including inmates who use wheelchairs, scooters, walkers, or other mobility devices. All aspects of law enforcement and correctional services are covered by these laws - including facilities, employment, transportation, and other activities, programs, and services.

Both the 2010 ADA Standards (S. 604.5 Exception #3) 521 CMR (S. 15.8) provide exceptions for the requirement of grab bars in cells that are specifically designed without protrusions for purposes of suicide prevention. However, in recent years grab bars have been designed so they do not increase suicide risk. As shown, there are several ways for grab bars to be designed with adequate gripping surfaces, while ensuring that nothing can be tied onto them (see below). Consideration should be given (not required) to installing suicide proof grab bars in the “accessible cell” as may be required in the future.



Police Station Accessibility Assessment

General Description of Obstacle	2010 ADAAG	MAAB 521 CMR	Type of Action to be Taken	P	F	TF	Cost Estimate
Parking The signage for the parking is 14" too low and lacks "van accessible" designation.	502.6	23.6	Signage must be set such that the signage should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located no more than 10' in front of the spaces. "Van accessible" signage should also be provided.	1	2	I	\$25
Accessible Route of Travel The curb ramp running slope is 9.8%, which exceeds the maximum allowed and there is no level landing. There is a 2" abrupt change in level surface and a gap of 2" at the transition of asphalt to granite. See Photo Police 1.	405.2 406.4 303.2 303.3	21.3 21.6.1 21.4	Modify/replace the curb ramp such that the running slope does not exceed 8.3% and there is a level landing at the top of the curb ramp. Modify the transition such that there are no gaps and the transition is flush or is no greater than ¼" or ¼" to ½" if beveled with a no more than 1:2 slope.	1 1	3 2	I I	Up to \$2,000+ Included in above.
Interior Door to Station The door has a glass pane that is 49" a.f.f., which is 6" too high under the 2010 ADA Standards.	404.2.11	NA	Doors, gates, and side lights adjacent to doors or gates, containing panels that permit viewing through the panels shall have the bottom of at least one panel located 43 inches maximum a.f.f. Frost or block the glass pane.	4	2	N	\$0
Lobby Counter The counter is 6½" too high.	904.4	7.2	Construct a 36" long by no more than 36" high a.f.f. counter, with a minimum of 27" of knee clearance.	2	3	N	Up to \$250
Drinking Fountain The drinking fountain is non-compliant as it is not a "high – low" fountain. In addition is not "high" or "low" as the spout height is 8" too high for a "low" fountain and 1" too high for a "high" fountain. In addition, the drinking fountain is a protruding object as it protrudes 14¾" into the accessible route of travel at a height of 38" a.f.f. <i>Note: Protruding objects extend more than 4" into the accessible route of travel between a height of 27" and 80" a.f.f. or have vertical headroom clearance reduced to less than 80".</i> See Photo Police 2.	211 307 305 306 602	36 20.6.1	Option #1: Discontinue use of the drinking fountain. Option #2 – Remove the existing drinking fountain and replace with a "hi-low" drinking fountain. The drinking fountain(s) must comply as follows: Protruding objects compliance of no > 4" protrusion between 27" and 80" a.f.f. (307); 30"x48" clear space requirement (305), and knee/toe clearance (306). Knee clearance is 9" to 27" a.f.f.; 25" deep max. at 9" a.f.f. or 11" deep min at 9" a.f.f. and 8" deep min at 27" a.f.f. Width of knee clearance s/b 30" wide min (306.3). Toe clearance as part of c.f.s. 17" min – 25" max, 9" high a.f.f., 30" wide (306.2). The spout s/b 15" min from wall and 5" max from the front edge of the unit (602.5). Flow of water 4" high min and spout located max 5" from front (602.6). The spout height s/b 36" max. a.f.f. for "low" and 38" min a.f.f. to 43" max a.f.f. for "high". The controls s/b operable w/one fist; no > 5 lbs force (309.4).	4	3	L	\$0 to \$4,500
Exterior and Interior Doors Exterior and interior doors with closers do not fully comply with the maximum allowed operating force for an exterior door (15 lbs.) and interior door (5 lbs.)	404.2.8 404.2.9	26.8 26.9	Adjust door closers such that the push/pull force does not exceed 15 lbs for an exterior door and 5 lbs. for an interior door with door closing speeds of at least 6 seconds.	1, 2, 3	2	I	\$0

and the minimum closing speed requirement of 6 seconds under 521 CMR.							
<u>Door Signage</u> Tactile designation signage is lacking on interior doors. This includes approximately 33 doors/rooms. See Photo Police 3.	703	41	Install tactile designation signage on the latch side of each door with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Signage s/b 60" a.f.f to the centerline of the sign (521 CMR). Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards). Provide signage that includes the Universal Symbol of Accessibility at the bathrooms that are accessible.	2, 3	2	I	Up to \$1,650
<u>Door Hardware</u> Non-compliant knob style hardware occurs on approximately 29 doors. See Photo Police 3.	404.2	26.11	Install lever style hardware that can be operated with a closed fist or loose grip.	2	2	I	Up to \$2,175+
<u>Light Switches</u> Light switches throughout the station vary up to 50" a.f.f. in height.	308.2 308.3	6.5 6.6	As may be required due to a reasonable accommodation request, lower light switches as necessitated to a height of no more than 48" a.f.f.	4	3	L	\$0 to TBD
<u>Hallway Bathroom</u> The bathroom has a sink with piping that is not wrapped, guarded, or insulated. The sink faucets require pinching and twisting of the wrist. The soap dispenser is 12" too high and the towel dispenser is 6" too high The mirror is 7½" too high. The door locking mechanism is 19" too high and requires pinching and twisting of the wrist. The water closet is 1½" too low, 3½" too close to the near wall, 16" too close to the far wall, and 11½" too close to the front wall. See Photo Police 4.	606.5 309 308.2 308.3 603.3 308.2 308.3 309 604.2 604.3 604.4	30.9.5 30.9.6 30.12 30.11 6.5 6.6 39.5 30.7.2 30.7.3	Wrap or insulate the piping. Replace the faucets with lever style faucets. Lower the dispensers to a height of no more than 42" a.f.f. to the operating mechanism. Lower the mirror to a height of no more than 40" a.f.f. to the bottom of the reflecting surface. Replace the door locking mechanism with one that does not require pinching or twisting of the wrist and a height of no more than 48" a.f.f. Replace the existing water closet with one that has a seat height of 17" to 19" a.f.f. and which is 18" o.c. from the near wall, 42" o.c. from the far wall, and at least 42" of clearance in front of the water closet. Substantial modification and enlargement of the bathroom area may be required.	3 3 3 3 3	2 2 2 2 2 3,4	I I I I L	\$75 \$250 \$0 \$0 \$50 TBD
<u>Dispatch/Female Officer Bathroom</u> The sink piping is not wrapped or insulated. The soap dispenser is 2" too high and the towel dispenser is 3" too high The mirror is 2" too high.	606.5 308.2 308.3 603.3	30.9.5 30.12 30.11	Wrap or insulate the piping. Lower the dispensers to a height of no more than 42" a.f.f. to the operating mechanism. Lower the mirror to a height of no more than 40" a.f.f. to the bottom of the reflecting surface.	3 3 3	2 2 2	I I I	\$75 \$0 \$0

The coat hook is 22½" too high.	308.2 308.3	6.5 6.5	Lower the coat hook to a height of no more than 48" a.f.f.	3	2	I	\$0
The water closet is 19½" too close to the far wall, and 6" too close to the front door.	604.2 604.3	30.7.2	Relocate the water closet so it is 18" o.c. from the near wall, 42" o.c. from the far wall, and at least 42" of clearance in front of the water closet. Substantial modification and enlargement of the bathroom area may be required.	3	3,4	L	TBD
The rear grab bar is 10" too short. See Photo Police 5.	604.5	30.8	Replace the grab bar with one that is 42" long.	3	2	I	\$150
Sallyport Area							
The stairs from the sallyport to the station has a railing on one side only which does not go the full length of the stairs, and lacks a bottom extension.	505	27	Install continuous stair railings on both sides of the stairs. Railings s/b between 34" – 38" a.f.f. to the top of the railing, circular or oval in x-section, 1¼" – 2" in outside diameter, and with extensions at the top (12" parallel to the ground) and bottom (slope distance one tread then 12" parallel to the ground).	4	3	L	Up to \$1,000
There is no accessible route from the sallyport to the police station. See Photo Police 6.	403	22	Engage with an architectural/engineering firm to develop options to create an accessible route of travel, including vertical access, between the sallyport and police station.	4	4	L	TBD
Holding Cells							
There are 3 male and 2 female cells, none of which are "accessible".	807	15	Option #1: Seek an arrangement with adjacent local jurisdictions to house disabled detainees.	4	1	I	\$0
The water closets have rim heights that are 1½" too low and also which are 2" too close to the near wall and 4" too close to the far wall.	807	15	Option #2: Modify one cell to comply with the water closet heights, water closet clearances, sink knee clearance, and doorway width.	4	3	L	TBD – up to \$100,000
The sinks lack knee clearance.	807	15					
In addition, there is only 24" of clear width into the cells, which is 8" too short and too narrow for a wheelchair. See Photos Police 7 and 8.	404.2.3	26.5					

\$12,150 to \$112,150+

Police Station Accessibility Assessment Photos



Photo Police 1



Photo Police 2

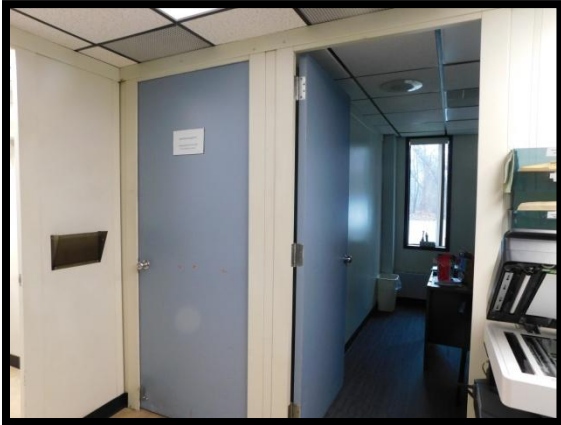


Photo Police 3



Photo Police 4



Photo Police 5

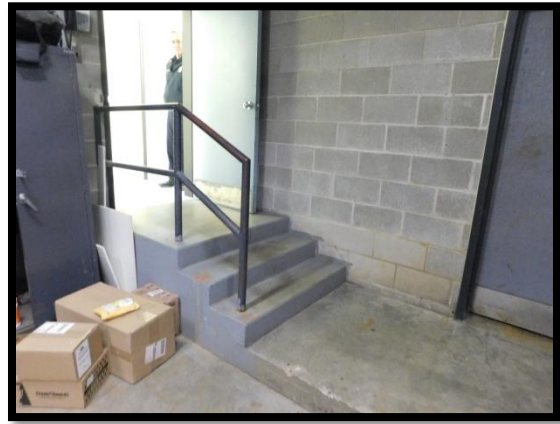


Photo Police 6



Photo Police 7

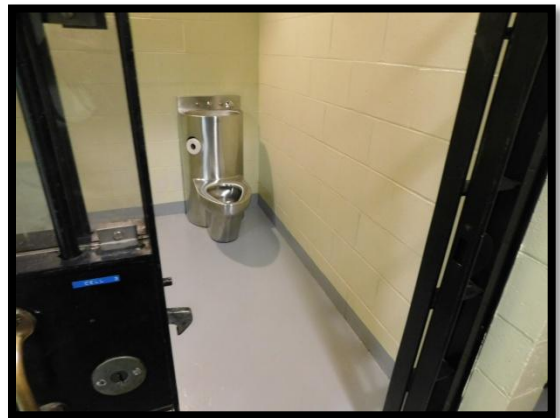


Photo Police 8

MILLBURY LIBRARY

Function and Description of Facility and Programs: Originally constructed in 1915, the building has undergone renovation and expansion including addressing overall accessibility and usability of the library. The two level masonry building is roughly 18,200 s.f. The main level and first floor contains the circulation desk, staff offices and work space, a staff lounge/kitchenette, a large meeting room, a children's room, a craft room, adult fiction, videos and DVD's, a teen room, internet access and service, and 4 restrooms (men's, women's , children's, and staff). The second level includes a circulating collection, a reference collection, magazines and newspapers, administrative offices, an administrative bathroom, a large reading room, and a local history room.



Responsible Party: Board of Selectmen and Town Manager

General Description or Obstacle Which Limits Mobility or Access: The Millbury Library is substantially accessible but does have various areas of non-compliance.

Parking

The signage for the designated accessible parking is too low and lacks "van accessible" signage.

Accessible Entrance

There is no directional signage in front of the building noting the location of the accessible entrance.

EV Charging Stations

There are two (2) EV charging stations at the rear of the Library and near the accessible entrance. The parking spaces are not level, there are no access aisles, and the payment slot/operating mechanism is at least 2" too high. Additional guidance on EV Charging Stations is provided in Chapter VI of this Plan.

Book Depositories Near the Accessible Entrance

The 2 book depositories are 53" a.f.f., which are 5" too high under the 2010 ADA Standards.

Picnic Table

A picnic table located near the side of the library is not on an accessible route of travel and lacks knee depth.

Exterior Stairs and Railings

The railings at the front stairs of the original building on Elm Street are not fully round or oval in shape and lack bottom extensions. In addition, the door hardware to the entrance requires pinching of fingers.

Side stairs on the Waters Street side have railings on one side only and lack top and bottom extensions. Stairs leading to the side main level door have a railing on one side only.

The main entrance stairs on Elm Street have railings that lack compliant bottom extensions.

Library Interior (General)

Interior and exterior doors with closers have excessive operating forces and close too fast. A number of interior doors lack tactile designation signage with some doors also having glass panes that are too high under the 2010 ADA Standards.

A drinking fountain on the main level is "low" only. A drinking fountain on the second level is "low" only and provides only 26½" of knee clearance (within allowed tolerance for 27" a.f.f.).

Tables in the Teen Section on the main level provide only 24½" of knee clearance. Tables in the Children's Section provide only 17" to 24" of knee clearance.

The contractor's first aid kit near the accessible entrance is too high. Room dispensers are too high. The staff lounge stove has controls on the back and not the front.

The "J Fiction" stacks in the Children's Section have only 34" of clear width.

Main Level Men's Bathroom

The soap and towel dispensers are too high. The metered sink faucets have excessive operating forces and do not stay open for at least 10 seconds. The urinal is 7" too high and provides only 27½" of clear width to access. The water closet stall door coat hook is too high and lacks an internal pull device. The toilet paper dispenser is located over the grab bars.

Main Level Women's Bathroom

The soap and towel dispensers are too high. The metered sink faucets have excessive operating forces and do not stay open for at least 10 seconds. The water closet stall door coat hook is too high and lacks an internal pull device. The toilet paper dispenser is located over the grab bars. The water closet flush control is on the wrong side and there is only 34½" of clear width in front of the water closet.

Main Level Staff Bathroom

The soap and towel dispensers are too high. The metered sink faucets have excessive operating forces and do not stay open for at least 10 seconds. The toilet paper dispenser is located over the grab bars. The water closet flush control is on the wrong side and the water closet lacks compliant clearance on the far side of the water closet due to storage.

Main Level Children's Bathroom

The soap and towel dispensers are too high. The metered sink faucets have excessive operating forces and do not stay open for at least 10 seconds. The toilet paper dispenser is too close to the front of the

water closet and located over the grab bars. The water closet flush control is on the wrong side. The water closet seat height, near wall set back, and grab bar heights do not adhere to a defined age or grade level, but rather a K – 3 water closet seat height, an adult water closet near wall set back, and a Grade 4 -6 grab bar height.

Level 2 Administration Bathroom

The soap and towel dispensers are too high. Both the soap and toilet paper dispensers are located over the grab bars. A coat hook is 23” too high. The water closet flush control is on the wrong side and the water closet lacks compliant clearance on the far side due to shelving.

Millbury Library Accessibility Assessment

<u>General Description of Obstacle</u>	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
<u>Parking</u> The signage for the designated accessible parking is 21” too low and lacks “van accessible” signage. See Photo Library 1.	502.6	23.6	Signage must be set such that the signage height should be a minimum of 60” high at the bottom (2010 ADAAG Standards) and a maximum of 96” at the top (MAAB 521 CMR). As the spaces meet the requirements for van accessible parking, “van accessible” signage s/be provided.	1	2	I	\$25
<u>EV Charging Stations</u> There are two (2) EV charging stations at the rear of the Library and near the accessible entrance. The parking spaces are not level, there are no access aisles, and the payment slot/operating mechanism is at least 2” too high. Additional guidance on EV Charging Stations is provided in Chapter VI of this Plan.	308.2 308.3	6.5 6.6	Although EV charging stations are not specifically addressed under the 2010 ADA Standards or 521 CMR, the Massachusetts Architectural Access Board and the U.S. Department of Energy provide guidance on charging stations (See Chapter VI of this Plan). The spaces should have striping for wheelchair access. The charging stations should be modified such that they are accessible and within reach range for a wheelchair user.	2	3	N	TBD
<u>Directional Signage</u> Outside directional signage at the front of the library directing patrons to the rear accessible entrance is not provided.	216	41.1.3	Provide directional signage noting the accessible side/rear entrance.	1	2	I	\$100
<u>Book Depositories</u> The 2 book depositories are 53” a.f.f., which are 5” too high under the 2010 ADA Standards. See Photo Library 2.	308.2 308.3	6.5 6.6	Lower one book depository so that it is no more than 48” a.f.f. to the opening mechanism.	1	3	N	TBD
<u>Exterior Picnic Table</u> The picnic table located on the side of the building is not on an accessible route of travel and lacks compliant knee depth.	403 221 902.3 306.3	22 14.4 19.6 19.5.2	Provide an accessible picnic table on-site with the accessible portion overlapping an existing segment of asphalt, which is also on a level surface (2.0% slope or less). The accessible picnic table must have a minimum of 30” clear width, 27” knee height, and 19” knee depth.	2	1	N	\$750
<u>Exterior Stairs and Stair Railings</u> The railings at the front stairs of the original building on Elm Street are not fully round or oval in shape and lack	505.7 505.10 404.2	27.4 26.11	As this entrance is an alarmed “emergency egress” only, seek a variance to retain the existing railings.	1	1	I	\$0

<p>bottom extensions. In addition, the door hardware to the entrance requires pinching of fingers.</p> <p>Side stairs on the Waters Street side have railings on one side only and lack top and bottom extensions. Stairs leading to the side main level door have a railing on one side only.</p> <p>The main entrance stairs on Elm Street have railings that lack compliant bottom extensions.</p> <p>See Photos Library 3, 4, and 5.</p>	<p>505.2 505.3 505.10</p> <p>505.10</p>	<p>27.4</p> <p>27.4</p>	<p>Provide railings where they are lacking. Modify or replace the railings that lack top and bottom extensions. Railings must comply as follows: railings s/b between 34" – 38" a.f.f. to the top of the railing, circular or oval in x-section, 1¼" – 2" in outside diameter, and with extensions at the top (12" parallel to the ground) and bottom (slope distance one tread then 12" parallel to the ground).</p> <p>Modify the railings such that the bottom extensions go the slope distance of one tread then 12" parallel to the ground.</p>	<p>1</p> <p>1</p>	<p>3</p> <p>3</p>	<p>N</p> <p>I</p>	<p>Up to \$3,000</p> <p>Up to \$500+</p>
<p><u>Door Operating Forces and Closing Speeds</u></p> <p>Exterior and interior doors with closers do not comply with the minimum closing speed requirement of 6 seconds or the maximum operating force of 15 lbs. for an exterior door and 5 lbs. for an interior door.</p>	<p>404.2.8 404.2.9</p>	<p>26.9 26.8</p>	<p>Adjust the door closers such that the closing speed is at least 6 seconds and the operating force does not exceed 15 lbs. for exterior doors and 5 lbs. for interior doors.</p>	<p>1</p>	<p>2</p>	<p>I</p>	<p>\$0</p>
<p><u>Signage</u></p> <p>The following interior doors lack tactile accessible signage:</p> <p><u>Main Level</u></p> <ul style="list-style-type: none"> Community Room double doors (2) Community Room storage (3) Door to circulation <p>See Photo Library 6.</p>	<p>703</p>	<p>41.1</p>	<p>Install accessible compliant signage on the latch side of each door with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Under 521 CMR, signage s/b 60" a.f.f. to the centerline of the sign. Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).</p>	<p>2</p>	<p>2</p>	<p>I</p>	<p>Up to \$300</p>
<p><u>Doors with Glass Panes</u></p> <p>The following doors have glass panes that exceed the maximum viewing height of 43" by up to 7½":</p> <p><u>Main Level</u></p> <ul style="list-style-type: none"> Community Room double doors Staff to Friend's Room Staff Lounge Children's Room (2) Assistant Director (2) Craft Room (2) <p><u>Level 2</u></p> <ul style="list-style-type: none"> Local History Office <p>See Photo Library 6.</p>	<p>404.2.11</p>	<p>NA</p>	<p>Doors, gates, and side lights adjacent to doors or gates, containing panels that permit viewing through the panels shall have the bottom of at least one panel located 43 inches maximum a.f.f.</p> <p>Frost or block the glass panes.</p>	<p>2, 4</p>	<p>2</p>	<p>N</p>	<p>\$0</p>
<p><u>Reach Range</u></p> <p>The following exceed the maximum reach range of 48" a.f.f. under the 2010 ADA Standards as follows:</p>							

Main Level <ul style="list-style-type: none"> Contractor's First Aid Kit near accessible entrance (67" a.f.f.) Staff Lounge towel dispenser (54" a.f.f.) and soap dispenser (51" a.f.f.) Craft Room towel dispenser (54" a.f.f.) <p>In addition, the staff lounge stove has the controls on the back and not the front of the stove.</p>	308.2 308.3	6.5 6.6	Lower the dispensers and first aid kit to a height of no more than 48" a.f.f.	4	2	I	\$0
	804.6.5	32.8	As necessary through a reasonable accommodation or when the unit needs replacing, provide a stove with the controls on the front panel.	4	1,2	L	Up to \$1,000+
Drinking Fountain The 2 hallway drinking fountains near the adult bathrooms and near the children's bathroom are "low only" drinking fountains. See Photo Library 7.	211	36	Option #1: Discontinue use of the drinking fountains. Option #2 – Add a "high" drinking fountain per location or remove the existing drinking fountains and replace with "hi-low" drinking fountains. The drinking fountains must comply as follows: Protruding objects compliance of no > 4" protrusion between 27" and 80" a.f.f. (307); 30"x48" clear space requirement (305), and knee/toe clearance (306). Knee clearance is 9" to 27" a.f.f; 25" deep max. at 9" a.f.f. or 11" deep min at 9" a.f.f. and 8" deep min at 27" a.f.f. Width of knee clearance s/b 30" wide min (306.3). Toe clearance as part of c.f.s. 17" min – 25" max, 9" high a.f.f., 30" wide (306.2). The spout s/b 15" min from wall and 5" max from the front edge of the unit (602.5). Flow of water 4" high min and spout located max 5" from front (602.6). and with the water flow within 3" from the front edge (36.3). The spout height s/b 36" max. a.f.f. for "low" and 38" min a.f.f. to 43" max a.f.f. for "high". The controls s/b operable w/one fist; no > 5 lbs force (309.4).	2	3	N	\$6,000 to \$12,000+
Book Stack and Accessible Route Clear Widths The "J Fiction" stacks in the Children's Section have only 34" of clear width.	403.5	12.2 20.3	Move the stacks, cabinets, and/or bookcases to achieve the required minimum 36" clear width.	2	2	I	\$0
Tables and Work Stations Tables/work stations at the following locations do not meet the minimum required knee clearance: <ul style="list-style-type: none"> Main Level Teen Section (24½" a.f.f. knee clearance) Tables in the Children's Section provide only 17" to 24" of knee clearance. This includes 5 computer catalogue tables with 24" of knee clearance, 3 work tables with 20" of knee clearance, 1 work table with 24" of knee clearance, and 1 computer station table with 17" of knee clearance. 	226 306.3	35	Provide a table in the Teen Section with a minimum of 27" a.f.f. knee clearance. The height of the table s/b between 28" and 34" a.f.f. to the top.	2	2	I	Up to \$350+
	902.4	35	Under the 2010 ADA Standards, a minimum of 24" of knee clearance must be provided for children's table and seating. Ensure that at least one work table and one computer table continue to provide a minimum of 24" of knee clearance.	2	2	I	\$0

Adult Bathrooms							
<u>Coat Hooks</u>							
Coat hooks are 6" to 7" too high in the bathrooms or stalls in the following bathrooms:	603.4 308	30.6.1	Lower the coat hooks so they are no more than 48" a.f.f.	3	2	I	\$0
<ul style="list-style-type: none"> Main Level Men's, Main Level Women's, Level 2 Administration 							
<u>Toilet Paper Dispensers</u>							
Toilet paper dispensers are located over the grab bars in the following bathrooms:	604.7	30.7.6 30.8.5	Relocate the dispensers so they are not over the grab bars. The toilet paper dispensers s/b a minimum of 7" and a maximum of 9" in front of the water closet measured to the centerline of the dispenser and at least 24" a.f.f. <i>Note: There also must be a at least 1½" clearance below the grab bar to the nearest object or fixture.</i>	3	2	I	\$0
<ul style="list-style-type: none"> Main Level Men's, Main Level Women's, Main Level Staff, Level 2 Administration 							
In addition, the Level 2 Administration bathroom soap dispenser is located over the grab bars.							
<u>Towel and Soap Dispensers</u>							
The soap dispensers are up to 15" too high in the following bathrooms:	308.2 308.3	30.12	Lower the soap dispensers to a height of no more than 42" a.f.f.	3	2	I	\$0
<ul style="list-style-type: none"> Main Level Men's, Main Level Women's, Main Level Staff, Level 2 Administration 							
The towel dispensers are up to 12" too high in the following bathrooms:	308.2 308.3	30.12	Lower the towel dispensers to a height of no more than 42" a.f.f.	3	2	I	\$0
<ul style="list-style-type: none"> Main Level Men's, Main Level Women's, Main Level Staff, Level 2 Administration 							
<u>Urinal</u>							
The urinal in the Main Level Men's Bathroom is 7" too high. In addition, there is only 27 ½" of clear width at the urinal.	605.2 305.3	30.10	Lower the urinal so that the rim is no more than 17" a.f.f. Modify the shield/water closet partition to achieve the minimum required 30" clear width to the urinal.	3	3	N	TBD – up to \$5,000
<u>Sink Faucets</u>							
The Main Level Men's and Women's Bathrooms and the Main Level Staff Bathroom have metered sink faucets with operating forces of up to 15 lbs.	309	30.9.6	Adjust/modify the faucets so they require no more than 5 lbs.of operating force.	3	2	I	\$0
The Main Level Men's and Women's Bathrooms and the Main Level Staff Bathroom have metered sink faucets that stay open for only 3 to 8 seconds.	606.4	30.9.6	Adjust/modify the faucets so they stay open for at least 10 seconds.	3	2	I	\$0
<u>Water Closet Flush Controls</u>							
Water closets in the following bathrooms have the flush control on the wrong side:	604.6	30.7.5	Modify and/or replace the water closets such that the flush control is on the wide or open side.	3	3	N	Up to \$3,000
<ul style="list-style-type: none"> Main Level Women's, Main Level Staff, Level 2 Administration 							
<u>Stall Door Pull Devices</u>							
The following bathrooms lack stall door interior pull devices:	604.8.1	30.6.1	Install interior pull devices.	3	2	I	\$20
<ul style="list-style-type: none"> Main Level Men's, Main Level Women's 							

Water Closet Clearances The far side clearance is 12" to 40" too short in the following bathrooms: <ul style="list-style-type: none"> Main Level Staff (30" due to storage) Level 2 Administration (2" due to book shelving) The front clearance of the Main Level Women's Bathroom water closet is only 34½", which is 7½" too short. See Photos Library 8 and 9.	604.2	30.7.2	Remove the items next to the water closets.	3	2	I	\$0
	604.3	30.7.2	Modify the stall and/or stall door to achieve the minimum required 42" front water closet clearance.	3	3	N	TBD – up to \$5,000+
Main Level Children's Bathroom The metered sink faucet has an operating force of 15 lbs. and stays open for only 4 to 5 secnds. The towel dispenser is 1" too high and the soap dispenser is 11" too high. The mirror is 5" too high. The toilet paper dispenser is 5" too close to the front of the water closet and is located over the grab bars. The water closet flush control is on the wrong side. The water closet seat height, near wall set back, and grab bar heights do not adhere to a defined age or grade level, but rather a K – 3 water closet seat height (12" to 15" a.f.f.), an adult water closet near wall set back (18" o.c.), and a Grade 4 - 6 grab bar height (25" to 27" a.f.f. See Photo Library 10.	309 606.4	30.9.6	Adjust/modify the faucets so they require no more than 5 lbs.of operating force and stay open for at least 10 seconds.	3	3	I	\$0
	308.2 308.3	30.12	Lower the dispensers to a height of no more than 36" a.f.f.	3	3	I	\$0
	NA	30.18	Lower the mirror so that it is no more than 31" a.f.f. to the bottom of the reflecting surface.	3	3	I	\$0
	604.9.6	30.14.5	Relocate the dispenser so it is are not over the grab bars. The toilet paper dispenser s/b a minimum of 7" and a maximum of 9" in front of the water closet measured to the centerline of the dispenser and 17" to 19" a.f.f. <i>Note: There also must be a at least 1½" clearance below the gab bar to the nearest object or fixture.</i>	3	3	I	\$0
	604.6	30.7.5					
	604.9	30.14.2 30.15.1	The actual water closet seat height is 12" a.f.f., the water closet near wall set back is 18" o.c., and the grab bar height is 26" a.f.f. It is unclear as the grade and/or age level this bathroom is designed to serve. However, if one assumes Grades 4 – 6 (Ages 9 – 12), then the water closet near wall set back and grab bar heights are compliant. A thicker seat would need to be purchased to raise the height to 15" to 17" a.f.f. to the top of the seat.	3	3	N	Up to \$125

Total up to \$31,170+

Millbury Library Accessibility Assessment Photos



Photo Library 1



Photo Library 2



Photo Library 3



Photo Library 4



Photo Library 5



Photo Library 6



Photo Library 7



Photo Library 8

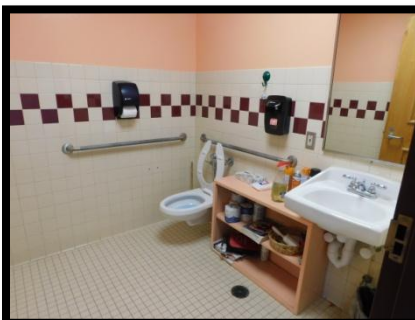


Photo Library 9



Photo Library 10

SENIOR CENTER

Function and Description of Facility and Programs: The Millbury Senior Center coordinates and operates senior-oriented comprehensive day to day services for Millbury residents age 60 and over and to residents under the age of 60 with disabilities. The Millbury Senior Center works on behalf of the older residents of the town to make sure that adequate services and activities are available. Programs are designed to improve and enrich the quality of life for the elderly. They include, but are not limited to, information/referral, nutrition counseling, outreach, transportation, health clinics, advocacy, and numerous social activities. The Center is a former train station which was renovated into a senior center in 1996. The roughly 6,680 s.f. facility consists of a reception office, director's office, small meeting/activity room, a craft room, a health room, a large dining room, a kitchen, and 2 bathrooms.



Responsible Party: Board of Selectmen and Council on Aging

General Description or Obstacle Which Limits Mobility or Access:

Parking

The 2 designated accessible parking spaces have signs that are too low and access aisles that are one foot too narrow. Neither space is van accessible.

Exterior

Three (3) picnic tables have only 11" of knee depth. At the time of the assessment, 2 of 3 tables were in winter storage so it is not clear if any are positioned on an accessible route of travel.

The ramp to the gazebo has a 22.6% running slope, which far exceeds the maximum 5.0% for a walkway and 8.3% for a ramp. There are no railings on the ramp and no level landing at the top. The door to the gazebo closes in less than 6 seconds.

Interior Common Areas and General

Interior and exterior doors with closers have operating forces and closing speeds which exceed that allowed. Doors/rooms lack tactile designation signage. The reception counter near the front entrance is 5¼" too high. The "Contractor's First Aid Box" and the "Defibrillator" in the dining room area are up to 13" too high. The Health Room sink is 2" too high, lacks knee clearance, and has a first aid box that is 15" too high.

Men's Bathroom

The tactile designation signage is 2" too high. The accessible stall door lacks a coat hook and an interior pull device. The water closet flush control is on the wrong side. The toilet paper dispenser is 4" too close to the front of the water closet. The rear and side grab bars are 1" too far from the interior corner. A wastebasket requires use of feet.

Women's Bathroom

The tactile designation signage is 2" too high. The accessible stall door coat hook is 12" too high. The door also lacks an interior pull device. The toilet paper dispenser is 7" too far from the front of the water closet. The rear grab is 1½" too far from the interior corner. A wastebasket requires use of feet.

Kitchen

The kitchen counters/sinks are too high and lack knee clearance. Various items and utensils are not within reach range. The door from the kitchen to the dining area has a glass pane that is 9½" too high under the 2010 ADA Standards. The counter between the kitchen and dining area is 2" too high. This counter is not used for food pick-up as staff delivers food directly to seniors and also retrieves uneaten food, drink, and dishes. The kitchen is for staff use and volunteers only who must meet minimum physical requirements to perform the essential functions of their duties. As this area is not open to the public and not for public use, modifications would only be triggered through a reasonable accommodation request.

Senior Center Accessibility Assessment

<u>General Description of Obstacle</u>	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
<u>Parking</u> The 2 designated accessible parking spaces have signs that are 11" too low and access aisles that are one foot too narrow. Neither space is van accessible. See Photo Senior 1.	502 208	23	Restripe the parking to provide two 8' wide spaces with an 8' wide shared access aisle. The spaces s/b noted as van accessible. Signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR.	1	2	I	Up to \$250
<u>Exterior Picnic Table</u> Picnic tables lack compliant knee depth.	403 221 902.3 306.3	22 14.4 19.6 19.5.2	Provide an accessible picnic table on-site with the accessible portion on an accessible route of travel and/or level surface (2.0% slope or less). The accessible picnic table must have a minimum of 30" clear width, 27" knee height, and 19" knee depth.	2	1	N	\$750

<u>Gazebo</u> The ramp to the gazebo has a 22.6% running slope, which far exceeds the maximum 5.0% for a walkway and 8.3% for a ramp. There are no railings on the ramp and no level landing at the top of the ramp. The door to the gazebo closes in less than 6 seconds. See Photo Senior 2.	405.2 505	24.2 24.5	Reconstruct the “ramp” such that the slope is less than 5.0% without railings or up to 8.3% with railings. There must be a level landing at the top of the ramp. If railings are required, they s/b paired at 34” to 38” a.f.f. (top) and 18” to 20” a.f.f. (lower) with 12” extensions at the top and bottom.	2	3	N	TBD – up to \$25,000
	404.2.8	26.9	Replace the closer with one that takes at least 6 seconds to close.	2	2	I	\$50
<u>Door Operating Forces and Closing Speeds</u> Exterior and interior doors with closers (including bathrooms) do not comply with the minimum closing speed requirement of 6 seconds or the maximum operating force of 15 lbs. for an exterior door and 5 lbs. for an interior door.	404.2.8 404.2.9	26.9 26.8	Adjust the door closers such that the closing speed is at least 6 seconds and the operating force does not exceed 15 lbs. for exterior doors and 5 lbs. for interior doors.	1	2	I	\$0
<u>Door Signage</u> The following interior doors lack tactile accessible signage: <ul style="list-style-type: none"> • Kitchen pantry (2) • Kitchen electrical • Door to kitchen from dining • Kitchen office/storage • Dining egress (2) • Double doors to dining from hallway (2) • Dining storage closet • Small meeting room/activity room • Craft room • Egress doors (3) • Director’s office from hallway • Reception from hallway • Health room • Janitor’s closet • Director’s office from reception In addition, the Men’s and Women’s Bathroom tactile designation signage is 2” too high. See Photo Senior 3.	703	41.1	Install new and/or relocate existing accessible compliant signage on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Under 521 CMR, signage s/b 60” a.f.f to the centerline of the sign. Tactile characters on signs s/b 48” min. a.f.f.. from baseline of lowest character and 60” max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	2, 3	2	I	Up to \$1,000
<u>Reach Range</u> The following exceed the maximum reach range of 48” a.f.f. under the 2010 ADA Standards for adults: <ul style="list-style-type: none"> • Dining Room “Contractor’s First Aid Kit” (60½” a.f.f.) • Dining Room defibrillator (61” a.f.f.) • Health Room sink first aid kit (63” a.f.f.) 	308.2 308.3	6.5 6.6	Lower the first aid kits and defibrillator such that the opening mechanisms are at a height of no more than 48” a.f.f.	4	2	I	\$0

Reception Counter The counter is 5¼" too high. See Photo Senior Center 4.	904.4	7.2	Construct a 36" long by no more than 36" high a.f.f. counter, with a minimum of 27" of knee clearance.	2	3	N	Up to \$250
Health Room Sink The sink is 2" too high and lacks knee clearance. See Photo Senior Center 5.	606.3 306.3	32.7	Modify the counter and sink so that it is no more than 34" a.f.f. at the top and there is a minimum of 27" knee clearance at the sink with guarded, wrapped, or insulated piping.	4	3	N	Up to \$1,000+
Men's and Women's Bathrooms The men's stall door lacks a coat hook and the women's stall door coat hook is 12" too high. Both bathrooms have stall doors that lack interior pull devices. The men's water closet toilet paper dispenser is 4" too close to the front of the water closet and the women's toilet paper dispenser is 7" too far from the front of the water closet. The waste baskets in both stalls require the use of a foot and the top cannot be opened with a loose grip or closed fist. The men's water closet grab bars are 1" too far from the interior corner and the women's water closet rear grab bar is 1½" too far from the interior corner. The men's water closet flush control is on the wrong side. See Photo Senior Center 6.	308 604.8.1 604.7 309.4 604.5 604.6	30.6.1 30.6.1 30.7.6 39.5 30.8.1 30.7.5	Install a coat hook on the men's stall door and lower the coat hook on the women's stall door. Coat hooks s/b at a height of no more than 48" a.f.f. Install interior pull devices. Relocate the toilet paper dispensers so they are a minimum of 7" and a maximum of 9" in front of the water closet measured to the centerline of the dispenser and at least 24" a.f.f. <i>Note: There also must be a at least 1½" clearance below the grab bar to the nearest object or fixture.</i> Modify the tops of the wastebaskets so they can be opened using a loose grip or closed fist. Relocate the grab bars such that the side grab bars are no more than 12" from the interior corner and the rear grab bars are no more than 6" from the interior corner. Replace the water tank or the toilet in entirety such that the flush control is on the wide or open side.	3 3 3 3 3	2 2 2 2 2	I I I I I	\$10 \$20 \$0 \$20 \$0 \$125 to \$350

Total up to \$28,650+

Senior Center Accessibility Assessment Photos



Photo Senior Center 1



Photo Senior Center 2

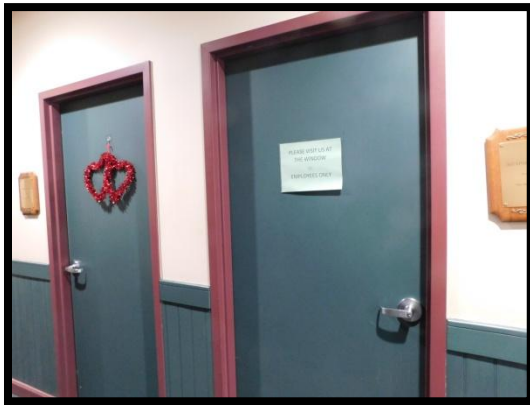


Photo Senior Center 3

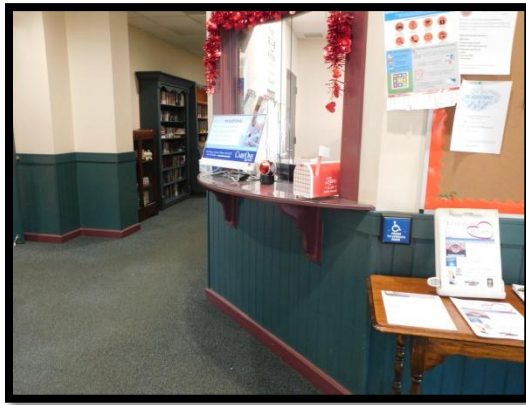


Photo Senior Center 4



Photo Senior Center 5



Photo Senior Center 6

MAIN FIRE STATION AND HEADQUARTERS

Function and Description of Facility and Programs: The Main Fire Station and Headquarters is a roughly 6,300 s.f., 2 level, masonry structure that was built in 1947 and has outlived its function and use as a fire station. A new Main Fire Station is currently under construction with the intent to move fire operations and administrative activities to that facility in late 2023/early 2024. The current building will no longer serve in any capacity for fire operations. The future use of this building is undetermined with options varying from demolition, reuse, or sale. As a result, the assessment is cursory in nature, identifying general areas of non-compliance if the building were to be reused in any capacity.



Responsible Party: Board of Selectmen, School Committee

General Description or Obstacle Which Limits Mobility or Access: The current Main Fire Station is predominately non-compliant under both the 2010 ADA Standards for Accessible Design and the 521 CMR Massachusetts Architectural Access Board Regulations.

Exterior

There exists no designated handicapped accessible parking spaces for station visitors. The front entrance is not accessible due to a 4½" step, has non-compliant door hardware, and the door closes too fast. 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.

The side egress stairs lack railings. The rear egress stairs and stairs used by EMS personnel lack uniform treads and risers, have some open risers, and stair railings that do not extend the full length of the stairs and lack bottom extensions.

Main Level

Once immediately inside the building is a small foyer area inclusive of a stairway to the second floor and a doorway which enters directly into the truck bay area. Access to either the administrative office or the EMS area is through the truck bay. Interior rooms and doors lack tactile designation signage. A number of doors have non-compliant knob style hardware. Light switches are generally 3" to 4" too high. Wall mounted coat racks are 22" too high. There are numerous protruding objects along the truck bay walls including the coat racks as well as various fire related apparatus and equipment. The EMS room has a 1" abrupt change in level surface in the interior of the doorway threshold.

The bathroom is wholly non-compliant as the sinks (2) lack compliant knee clearance; have dispensers and a mirror that are too high; a toilet paper dispenser that is improperly mounted behind the water closet; the lack of grab bars; and a water closet that lacks near wall and far wall clear widths. In addition, a shower is too small to be accessible, has a 3½" lip to enter, and lacks accessible hardware and components.

Level 2

The second floor, which houses the firefighter quarters and training areas is not accessible and is not open to the general public. The only means of access is via stairs. The stairs have a railing on one side only that are not round or oval in shape and lack top extensions.

Three (3) doors on this level lack tactile designation signage and have knob style hardware. Light switches are generally 3" to 4" too high. A kitchen area has a counter/sink that is 2" too high; lacks knee clearance; and has sink faucets that require pinching or twisting of the wrist. A stove also has controls that are located on the back and not the front of the stove.

A bathroom on this level is wholly non-compliant as the sink lacks knee clearance; has dispensers and a mirror that are too high; a toilet paper dispenser that is improperly mounted behind the water closet; the lack of grab bars; and a water closet that has a flush control on the wrong side and is 10" too far from the near wall. In addition, there is only 28" of clear width at the doorway into the bathroom.

Internal Route of Travel

There is no internal accessible route of travel between the main and second levels. If there is to be public use or private use open to the public on the second level, vertical access is required via an elevator, limited use elevator, or a vertical wheelchair lift. Under most construction options additional compliance requirements would be triggered and in the case of an elevator or limited use elevator, full code compliance under 521 CMR due to the cost of the renovations vs. the value of the building may also be required. Vertical access modifications may also trigger additional structural, electrical, mechanical, fire alarm and possibly plumbing alterations and modifications depending on location and what is required. Accounting for unforeseen costs (15% contingency), demolition, finishes, general conditions including overhead and profit (20%), architect oversight, and compliance with prevailing wage, construction costs could be considerable.

Main Fire Station and Headquarters Accessibility Assessment

General Description of Obstacle	2010 ADAAG	MAAB 521 CMR	Type of Action to be Taken	P	F	TF	Cost Estimate
Parking There is no striped designated accessible parking space inclusive of access aisle. The designated accessible parking space must also be van accessible.	502 703.7.2	23	Stripe and designate a van accessible parking space with van accessible signage at a width of either 11' with a 5' access aisle or 8' parking space with an 8' access aisle (2010 ADA Standards). Signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located no more than 10' in front of the space.	1	2	N	Up to \$200
Building Access and Egress There is a 4½" step at the main entrance into the building. The side egress stairs lack railings. The rear access/egress stairs to the EMS area lack uniform treads and risers, have some open risers, and stair railings that do not extend the full length of the stairs and lack bottom extensions. See Photos Main Fire 1, 2, and 3.	403 505 505 504	22 27.4 27.4 27.2	Modify the approach and entrance so that it is on-grade with no greater than a ¼" unbeveled surface change or up to ½" beveled surface change with no greater than a 1:2 slope.. Install compliant railings on the side and rear stairs. Railings s/b continuous on both sides of the stairs at a height of 34" – 38" to the top of the handrails, round or oval in shape and with extensions at the top 12" parallel to the floor and the slope distance of one tread then 12" parallel to the floor at the bottom. Reconstruct the rear stairs. Stair treads must be uniform and 4" to 7" high and no greater than 11" deep. Open risers are not allowed.	1, 2 1, 2 1, 2	3 3 3	N N N	Up to \$50,000 Included in above Included in above
Door Hardware The entrance/egress doors and interior doors on the main and second levels have non-compliant knob style hardware. This involves a total of approximately 8 doors.	404.2	26.11	Install lever style hardware that can be operated with a closed fist or loose grip.	2	2	N	\$100
Signage A total of approximately 11 doors on the main and second levels lack tactile designation signage.	703	41.1	Install accessible compliant signage on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Under 521 CMR, signage s/b 60" a.f.f. to the centerline of the sign. Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards). Bathroom signage must include the Universal of Symbol of Accessibility.	2	2	N	Up to \$550
Reach Range The following exceed the maximum reach range height of 48" a.f.f. for an adult under the 2010 ADA Standards: <ul style="list-style-type: none"> Light switches on main and second levels (up to 52" a.f.f.) Coat racks (2) at up to 70" a.f.f. 	308.2 308.3	6.5 6.6	Lower the light switches to no more than 48" a.f.f. Provide coat racks that are no more than 48" a.f.f.	2 2	3 3	N N	TBD – up to \$7,500 \$100

<u>Protruding Objects</u> Protruding objects extend more than 4" into the accessible route of travel between a height of 27" and 80" a.f.f. or have vertical headroom clearance reduced to less than 80". There are numerous protruding objects on the walls of the fire station including coat racks as well as various fire related apparatus and safety equipment.	307.2	20.6.1	Items within the accessible route of travel that are protruding objects should be relocated or, if feasible, have a fixed object placed beneath for cane detection.	2	2	N	\$0
<u>EMS Area Interior Doorway</u> There is a 1" abrupt change in level surface at the interior of the EMS area threshold.	403	22	Modify the threshold so that there is no greater than a ¼" unbeveled surface change or up to ½" beveled surface change with no greater than a 1:2 slope..	2	2	N	\$200
<u>Stairs Between Main Level and Level 2</u> The stairs have a railing on one side only, are not round or oval in shape, and lack top extensions. See Photo Main Fire 4.	505.2 505.3 505.10 505.7	27.4	Provide railings on both sides of the stairs that are round or oval in shape, continuous, at a height of 34" to 38" a.f.f. to the top of the gripping surface, and with a top extension 12" parallel to the floor and a bottom extension the slope distance of one tread then 12" parallel to the floor (as feasible).	2	2	N	Up to \$3,000
<u>Level 2 Kitchen Area</u> A kitchen area has a counter/sink that is 2" too high, lacks knee clearance, and has faucets that require pinching and twisting of the wrist. The stove has controls on the back and not the front of the stove. See Photo Main Fire 5.	804.3.2 306.3 804.6.5 309	32.2 32.6 32.7 32.8 32.5	Modify the counter and sink so that the counter/sink is no more than 34" a.f.f. and there is a minimum of 27" knee clearance at the sink with guarded, wrapped, or insulated piping. The sink faucets s/b lever style and not require pinching or twisting of the wrist. As necessary through a reasonable accommodation or when the unit needs replacing, provide a stove with the controls on the front panel.	2	3	N	Up to \$4,500
<u>Vertical Access to Level 2</u> There is no accessible route of travel to the second level from the main level.	401	20	Option #1: Use the second level for storage only or restrict all public access. Option #2: Provide a vertical wheelchair lift, limited use elevator, or elevator to the second floor.	2 2	1 3,4	N N	\$0 TBD – up to \$750K+
<u>Main Level and Level 2 Bathrooms</u> <u>Main Level</u> The bathroom is wholly non-compliant as the sinks (2) lack compliant knee clearance; have dispensers and a mirror that are too high; a toilet paper dispenser that is improperly mounted behind the water closet; the lack of grab bars; and a water closet that lacks near wall and far wall clear widths. In addition, a shower is too small to be accessible, has a 3½" lip to enter, and lacks accessible hardware and components. <u>Second Level</u> The bathroom on this level is wholly non-compliant as the sink lacks knee clearance; has dispensers and a mirror that are too high; a toilet paper dispenser that is improperly mounted behind the water closet; the lack of grab bars; and a water closet that has a flush control on the wrong side and is	306 308.2 308.3 603.3 604.7 604.5 609 604.2 604.3 604.6 404.2.3	30.9.3 30.12 30.11 30.7.6 30.8 30.7.2 30.7.5 26.5	The bathrooms would need to widened/reconstructed and substantially modified as follows to meet accessibility requirements: Install a water closet with the flush control on the wide or approach side; a seat at a height of 17" to 19" a.f.f. and is located 18" o.c. from the nearest wall, at least 42" from the farthest wall, and at least 42" in front of the toilet. Provide sinks with a minimum of 27" of knee clearance with wrapped, guarded or insulated sink piping. Mirrors must be no more than 40" a.f.f. to the bottom of the reflecting surface. Dispensers must be no more than 42" a.f.f. to the operating mechanism. Toilet paper dispensers s/b a minimum of 7" and a maximum of 9" in front of the water closet measured to the centerline of the dispenser and at least 24" a.f.f.	3	3,4	N	Up to \$75,000+

10" too far from the near wall. In addition, there is only 28" of clear width at the doorway into the bathroom. See Photos Main Fire 6, ,7 and 8.			<p><i>Note: There also must be a at least 1½" clearance below the gab bar to the nearest object or fixture and the dispensers cannot be located over the grab bars.</i></p> <p>Install 42" long side and rear grab bars such that the top of the gripping surfaces are 33" to 36" a.f.f. The side grab bar s/b no more than 12" from the interior corner and the rear grab bar no more than 6" from the interior corner.</p> <p>Water closets must have the flush control on the wide or approach side. The water closet s/b 17" to 19" a.f.f. to the top of the seat with 18" o.c. near wall clearance, 42" o.c. far wall clearance and 42" clearance in front of the water closet.</p> <p>Doorways to the single user stall bathrooms s/b a minimum of 32" wide.</p> <p>As the building will no longer be used as a fire station and the shower is currently not used, remove the shower to achieve bathroom and water closet maneuverability and required clearances.</p>			
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Total Up to \$891,150+

Main Fire Station and Headquarters Accessibility Assessment Photos



Photo Main Fire 1



Photo Main Fire 2



Photo Main Fire 3

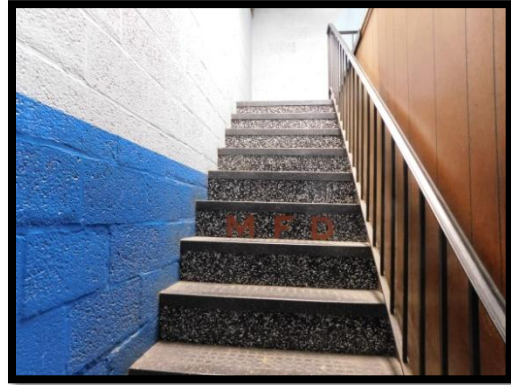


Photo Main Fire 4

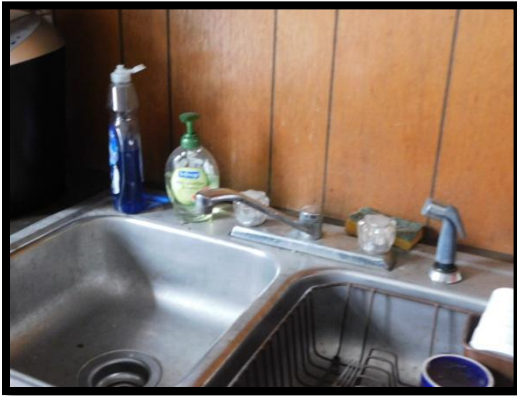


Photo Main Fire 5

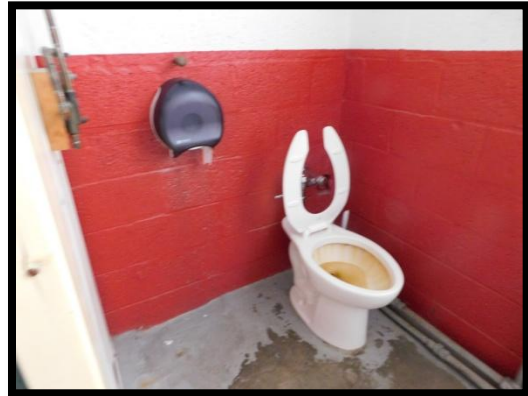


Photo Main Fire 6



Photo Main Fire 7



Photo Main Fire 8

FIRE DEPARTMENT STATIONS #2, #3, AND #5

Description of Facilities and Programs: The Millbury Fire Stations #2, 3, and 5 serve as fire sub stations in dispersed locations throughout the town. Each station has assigned to it 8 to 12 firefighters and a captain. These small fire stations have 1 or 2 bays to house equipment and typically a meeting room, office, and bathroom. The stations are not staffed, have secured access, and are fully closed to the public. All administrative and public interactions/permitting occur at the Main Fire Station.

<u>Station #</u>	<u>Location</u>	<u>Size</u>	<u>Year Built</u>
2	207 West Main Street	3,210 s.f.	1975
3	1489 Grafton Road	2,585 s.f.	1960
5	240 Millbury Avenue	1,240 s.f.	1955



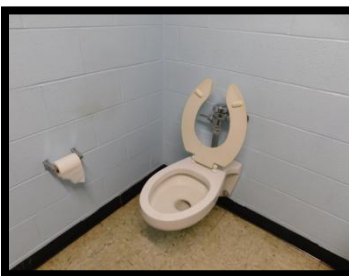
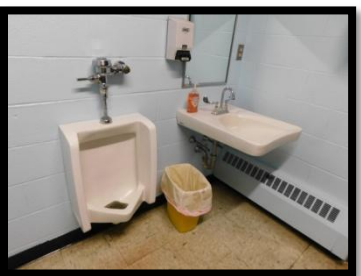
Responsible Party: Board of Selectmen.

General Description or Obstacle Which Limits Mobility or Access:

Station #2

There is no designated accessible parking. The meeting/dining room has a sink/counter that is 2" too high and lacks knee clearance. The cabinets lack hardware and the soap and towel dispensers are too high. Light switches and a wall mounted telephone are not within reach range. Doors have glass panes that are too high under the 2010 ADA Standards and lack tactile designation signage.

The 2 bathrooms (men and women) lack tactile designation signage and have doors with excessive operating forces and doors that close too fast. Sinks have piping that lack insulation. Dispensers are too high. The water closets lack grab bars and have non-compliant near, far, and/or front clear widths. The men's bathroom also has a water closet flush control on the wrong side, a toilet paper dispenser that is too close to the front of the water closet, and a shower that lacks accessible features and is too small for a wheelchair user.



Station #3

There is no designated accessible parking. The meeting/dining room has a sink/counter that is 2" too high, lacks knee clearance, and faucets that require pinching and twisting of the wrist.

Interior doors and doorways lack tactile designation signage with 3 doors having non-compliant knob style hardware.

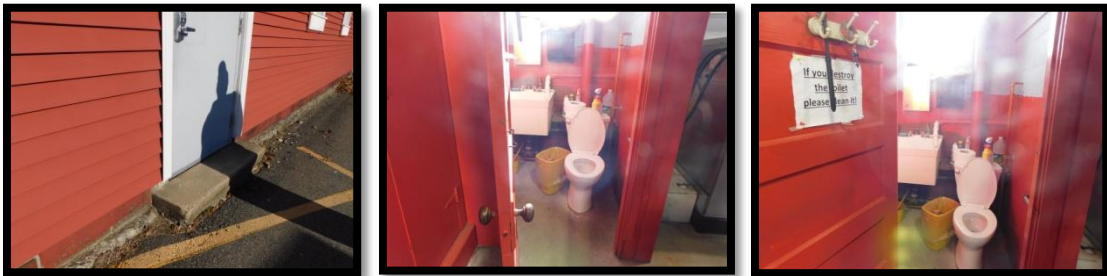
A bathroom has only 28" of clear width to access, lacks tactile designation signage, and has knob style hardware. The sink piping is not wrapped or insulated. The mirror and towel dispenser are too high. The water closet lacks grab bars, has the flush control on the wrong side, and is 5½" too close to the near wall. The toilet paper dispenser is 3" too far from the front of the water closet.



Station #5

There is no designated accessible parking. There is a 6" step and change in level surface to access the building. There is also a 6" to 7" change in level surface to enter a meeting room from the apparatus bay. Interior doors lack tactile designation signage and have non-compliant knob style hardware. Light switches are up to 12" too high.

A bathroom has only 28" of clear width to access, lacks tactile designation signage, and has knob style hardware. The sink lacks knee clearance and has piping that is not wrapped or insulated. The mirror, soap dispenser, towel dispenser, and coat hooks are too high. The eye hook locking mechanism requires pinching and use of the fingers. The water closet lacks grab bars and lacks required near, far, and front clearances.



Current Use to Remain

If the use of Stations #2, 3, and 5 continue solely as vehicle storage and fully closed to the public, then access would be solely limited to firefighter personnel who must meet strict physical requirements to perform the essential functions of their job. Therefore if this is the sole use, modifications would only be required as a result of a reasonable accommodation request.

Full Building Use

If the use of the buildings were to change including public use and access, then modifications to address those areas of non-compliance under both 521 CMR and the 2010 ADA Standards would be required.

DEPARTMENT OF PUBLIC WORKS – HIGHWAY GARAGE & WASTE WATER PUMPING STATION

Description of Facility and Programs: The Millbury Public Works Department renders services to residents in the areas of highway maintenance and construction, snow and ice operations, cemeteries, wastewater collection and treatment, parks and playgrounds, transfer station operation, public shade tree maintenance, street lighting, dam maintenance, and storm water collection system oversight.

Administrative offices, including related permitting and resident interaction, occurs primarily in the DPW office in the Town Hall. According to town personnel, limited interactions with the public are scheduled to take place in a designated area in the Waste Water Pumping Station Office Building. The Department of Public Works operations and equipment, including Highway, Parks and Recreation, and Waste Water Pumping is located at 131 – 137 Providence Street. With the exception as noted above with the Waste Water Pumping Station Office Building, this location is not open to the public with access limited to department employees.

Responsible Party: Board of Selectmen, Sewer Commission

DPW Highway and Parks and Recreation



DPW Waste Water Treatment



General Description or Obstacle Which Limits Mobility or Access:

DPW Highway and Parks and Recreation

The Highway Buildings including the Park and Recreation Garage, Highway Garage, and related out buildings are closed to the public and are limited solely to highway personnel. There is no designated accessible parking on site.

The Park and Recreation Garage consists of a large bay area housing tractors, mowers and other equipment. A side door has a 9" change in level surface to enter and has knob style hardware. A small

bathroom in the building is wholly non-compliant as it lacks tactile designation signage; has knob hardware; has a sink that is too high, lacks insulation on the piping, and has faucets that require pinching and twisting of the wrist; a water closet that lacks near, far, and front minimum clear widths and no grab bars.

The Highway Garage consists of 8 vehicle bays housing trucks and equipment, an office, and a second level Break Room and bathroom. Doors have knob style hardware and lack tactile designation signage. A sink on the main level lacks knee clearance and insulation of the piping. Dispensers and a first aid kit are not within reach range. The stairs to the second level lack top and bottom extensions. The Break Room sink/counter is 1" too high and lacks knee clearance. In addition, the dispensers are too high. The bathroom on the second level has a urinal that is 7" too high; a water closet stall door that is only 24" wide and which opens in; and a water closet that lacks near, far, and front minimum clear widths and no grab bars. A sink in the bathroom has only 20" of knee clearance and has dispensers that are too high.

As all highway personnel must meet strict physical requirements for the essential functions of their job, unless the current practices and policies change and current non-public interior spaces are open to the general public, physical modifications would be limited to those required as a result of a reasonable accommodation request. No modifications are required at the present time.

Waste Water Pumping Facility

The Waste Water Pumping Station is closed to the public and is limited solely to waste water personnel. The facility consists of a garage and a pump facility.

Waste Water Pumping Facility Office Building

There is no designated accessible parking on site. The office building has 2 entrance doors with knob hardware and which have a 4" change in level surface to enter the building. Exterior side stairs have a railing on one-side only with no top or bottom extensions. Interior doors lack tactile designation signage and have knob style hardware. Light switches are up to 3" too high. A Break Room has a sink/counter that is 1" too high and lacks knee clearance. In addition, the towel dispenser is too high and a stove has the controls on the back and not on the front of the stove. Two hallway first aid stations are too high and also serve as protruding objects. A bathroom has a sink that lacks pipe insulation, faucets that require pinching and twisting of the wrist, and a towel dispenser and a mirror that are too high. The water closet is too low; lacks near, far, and front minimum clear widths; and no grab bars. A shower lacks maneuverability, lacks accessible features, and has an 8" abrupt change in level surface to enter the shower. A sink near the lockers lacks knee clearance and has insufficient clear width in front of the sink.

The Town intends to allow the public to access the building using the main entrance for walk-in business transactions for both DPW and Sewer Departments. Public access would be limited to a front office with no access to the remainder of the building including the bathrooms. Required modifications as a result of this change in use will include the provision of designated accessible parking, eliminating the abrupt change in level surface at the entrance, the provision of exterior and interior lever style hardware, the provision of interior tactile designation signage, and relocating the hallway first aid kits. WWTF personnel must meet strict physical requirements for the essential functions of their job, therefore physical modifications to the remaining non-public interior spaces would be limited to those required as a result of a reasonable accommodation request. This would include the bathroom and break room.

DPW – WWTF Office Building Accessibility Assessment

<u>General Description of Obstacle</u>	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
<u>Parking</u> There is no striped designated accessible parking space inclusive of access aisle. The designated accessible parking space must also be van accessible. See Photo WWTF 1.	502 703.7.2	23	Stripe and designate a van accessible parking space with van accessible signage at a width of either 11' with a 5' access aisle or 8' parking space with an 8' access aisle (2010 ADA Standards). The parking space and access aisle cannot have slopes that exceed 2.0% in any direction. Signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located no more than 10' in front of the space.	1	2	I	Up to \$250
<u>Building Access</u> The main entrance has an abrupt change in level surface of up to 4" to access the building. See Photo WWTF 2.	404.2.5	26.10	Modify the entrance by constructing a sloped approach (5.0% running slope or less) with a minimum of a 5' level (2.0% or less) landing at the doorway.	1	3	I	Up to \$1,000
<u>Door Hardware</u> The main entrance door and office doors have knob-style hardware. See Photo WWTF 3.	404.2	26.11	Install lever-style or similar accessible compliant hardware on the door.	1, 2	2	I	Up to \$300
<u>Door Signage</u> Tactile designation signage is not provided on the interior doors. See Photo WWTF 3.	703	41.1	Install accessible compliant signage on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Under 521 CMR, signage s/b 60" a.f.f. to the centerline of the sign. Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards). The tactile signage for the machine room, attic, and garage bay area should also note that public access is not allowed.	2	2	I	Up to \$250
<u>Protruding Objects</u> <ul style="list-style-type: none"> Hall First Aid Kits (2) Protruding objects extend more than 4" into the accessible route of travel between a height of 27" and 80" a.f.f. or have vertical headroom clearance reduced to less than 80".	307.2	20.6.1	Relocate the first aid kits so they are not in the accessible route of travel and at a height of no more than 48" a.f.f. to the opening mechanism.	4	2	I	\$0

Total up to \$1,800+

DPW – WWTF Office Building Accessibility Assessment Photos



Photo WWTF 1



Photo WWTF 2



Photo WWTF 3

SCHOOL ADMINISTRATION BUILDING

Function and Description of Facility and Programs: The Millbury School Administration Building is located on the grounds of the Senior-Junior High School. It is a one-story masonry building that was constructed in 2002 and totals roughly 1,800 s.f. The building is built on a slope with the walk-out lower level consisting of a garage and storage area for the school facilities department. The main level includes 3 offices, a small meeting room, a staff kitchenette, a bathroom, and closets.



Responsible Party: Board of Selectmen and School Committee

General Description or Obstacle Which Limits Mobility or Access:

Exterior

The designated accessible parking space lacks signage, is not noted as van accessible, and has excessive running slopes.

The landing at the main entrance is not level and has a running slope of 8.6%. There is also a 1" to 1 ½" abrupt change in level surface at the doorway threshold. The egress door has a 2" abrupt change in level surface at the threshold.

Interior – General

The interior lobby door has an excessive operating force of 12 lbs. and closes in only 3 seconds. The rooms, offices, and closets (9) lack tactile designation signage with one closet door having knob-style hardware. The meeting room table has only 26 ½" of knee clearance. A staff hallway coat rack is 64½"

a.f.f., which is 16 ½" too high under the 2010 ADA Standards. The staff kitchenette counter/sink is 2" too high and lacks knee clearance. The cabinets (11) lack hardware. The soap and towel dispensers are located over an obstruction (sink counter).

Interior - Bathroom

The towel dispenser, soap dispenser, mirror, and coat hook are all too high. The "mirror cabinet" over the sink lacks hardware. The water closet is 1" too far from the near wall, 14" too close to the sink on the far side, and 13" too close to a cabinet in front of the toilet. The grab bars are 6" too short at 36" in length and are ¼" to up to ¾" too high.

Observation: A cabinet mounted over the water closet could pose problems with reduced headroom. Consideration (not necessarily required) should be given to replacing with a narrower cabinet.

School Administration Building Accessibility Assessment

<u>General Description of Obstacle</u>	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
<u>Parking</u> The designated accessible parking and access aisle near the main entrance has running slopes that vary up to 4.2%. The space lacks accessible signage. <i>Note: The space and access aisle widths meet the size requirement for a van accessible space.</i> See Photo Admin 1.	502 208	23	Reconstruct/repave the parking space and access aisle such that the slopes do not exceed 2% in any direction. Provide signage that is a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located no more than 10' in front of the space. Van accessible signage should also be provided.	1	3	N	Up to \$2,500+
<u>Building Access and Egress</u> The landing at the front entrance has a running slope of up to 8.6%, which far exceeds the maximum of 2.0%. There is also an abrupt change in level surface of 1" to 1 ½" at the entrance door threshold. There is a 2" abrupt change in level surface at the egress door threshold. See Photos Admin 2 and 3.	404.2.4 404.2.5	25.2 26.10	Reconstruct the front entrance landing to provide a 5' level landing with no more than a 2.0% slope in any direction at the doorways. Modify the doorway thresholds such that the change in level surface is less than ¼" or ¼" to ½" with a beveled slope of no greater than 1:2.	1	3	N	Up to \$1,250
<u>Door Operating Force and Closing Speed</u> The interior lobby door has an opening force of 12 lbs. and has a closing speed of only 3 seconds.	404.2.8 404.2.9	26.9 26.8	Adjust the door closer such that the closing speed is at least 6 seconds and the operating force does not exceed 5 lbs.	1	2	I	\$0
<u>Door Signage</u> The following interior doors/rooms lack tactile designation signage: <ul style="list-style-type: none"> • Superintendent's Office • Small Meeting Room • Assistant Superintendent's Office • Curriculum Director's Office • Staff Kitchenette • Bathroom • Hallway Door to Egress 	703	41.1	Install new and/or relocate existing accessible compliant signage on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Under 521 CMR, signage s/b 60" a.f.f. to the centerline of the sign. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA	2, 3	2	I	Up to \$450

<ul style="list-style-type: none"> • Closet • Bathroom Closet <p>In addition, the Men's and Women's Bathroom tactile designation signage is 2" too high.</p> <p>See Photo Admin 4.</p>			Standards).				
<p>Door Hardware</p> <p>The closet door has knob-style hardware.</p>	404.2	26.11	<p>Install lever-style or similar accessible compliant hardware on the closet door.</p> <p><i>Note: Depending on the door and type/quality of hardware, lever hardware may vary from \$75 to \$275 per unit. The estimate provided is at the low range (\$75) for the door.</i></p>	4	2	I	\$75
<p>Meeting Room Table</p> <p>The meeting room table has only 26½" of knee clearance.</p>	306.3	35.5	Raise (adjust if optional or "block") the table to achieve the minimum required 27" of knee clearance.	2	2	I	\$0
<p>Reach Range</p> <p>The hallway coat hooks/rack is 64½" a.f.f., which is 16½" too high.</p>	308.2 308.3	6.5 6.6	Provide at least one coat hook at a height of no more than 48" a.f.f.	4	2	I	\$10
<p>Staff Kitchenette</p> <p>The sink/counter is 36" a.f.f. which is 2" too high and lacks knee clearance.</p> <p>The 11 cabinets lack hardware.</p> <p>The towel dispenser is 45" a.f.f. and the soap dispenser is 48" a.f.f., but both are located over an obstruction greater than 34" a.f.f.</p> <p>See Photo Admin 5.</p>	804.3.2 306.3 309 308.2 308.3	32.2 32.6 32.7 32.5 6.5 6.6	<p>Modify the counter and sink so that the counter/sink is no more than 34" a.f.f. and there is a minimum of 27" knee clearance at the sink with guarded, wrapped, or insulated piping.</p> <p>Install hardware that can be used with a loose grip or closed fist.</p> <p>If the sink/counter is no more than 34" a.f.f. and has compliant knee clearance and depth, no further action is required. If the sink/counter is not modified, then the dispensers would need to be relocated so not over an obstruction and no higher than 48" a.f.f.</p>	4 4 4	3 2 2	N I I	Up to \$2,500 \$110 \$0
<p>Bathroom</p> <p>The towel dispenser (45" a.f.f.), soap dispenser (43" a.f.f.), mirror 50½" a.f.f.), and coat hook (66" a.f.f.) are all too high.</p> <p>The "mirror cabinet" over the sink lacks hardware.</p> <p>The water closet is 1" too far from the near wall, 14" too close to the sink on the far side, and 13" too close to a cabinet in front of the toilet.</p> <p>The grab bars are 6" too short at 36" in length and are ¼" to up to ¾" too high.</p> <p>See Photo Admin 6.</p>	308 603.3 309.4 604.2 604.3 604.5 609.5	30.12 30.11 6.5 6.6 39.5 30.7.2 30.8	<p>Lower the towel and soap dispensers to a height of no more than 42" a.f.f. to the operating mechanisms. Lower the coat hook to a height of no more than 48" a.f.f. Lower the mirror to a height of no more than 40" a.f.f. to the bottom of the reflecting surface.</p> <p>Install hardware that is operable with a loose grip or closed fist.</p> <p>As feasible and/or as required as a result of a reasonable accommodation request, modify the bathroom such that the water closet is 18" o.c. from the near wall, is 42" o.c. from the far wall or nearest object (sink), and has 42" clearance in front of the toilet.</p> <p>Replace the existing grab bars with ones that are 42" long and are 33" to 36" a.f.f. to the top of the gripping surface. The side grab bar s/b no more than 12" from the interior corner. The rear grab bar s/b no more than 6" from the interior corner.</p>	3 3 3	2 2 2	I I L I	\$0 \$10 TBD \$350

Total up to \$7,245+

School Administration Building Accessibility Assessment Photos



Photo Admin 1



Photo Admin 2



Photo Admin 3

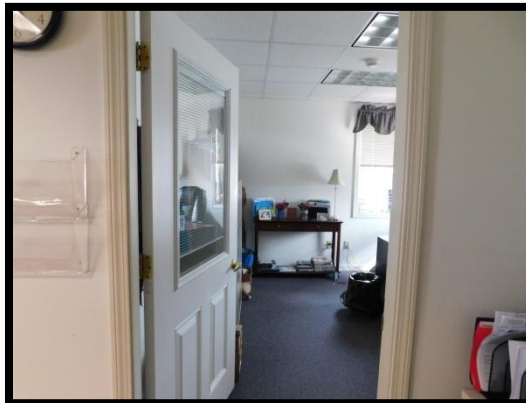


Photo Admin 4



Photo Admin 5



Photo Admin 6

MILLBURY TRANSFER STATION

Function and Description of Facility and Programs: The transfer station is located at 207 Riverlin Street. The facility is open to the public 5 days a week from 7AM to 3PM for a total of 40 hours. The facility consists of a large metal frame building for trash disposal and various roll-off containers and bins for disposal of trash, metals, wood, recyclables, and other items.



Responsible Party: Board of Selectmen

General Description or Obstacle Which Limits Mobility or Access:

General Areas of Public Use and Access

There are no designated accessible parking spaces. In addition there is no accessible route of travel to the trash disposal area due to an 8" level surface change from the asphalt parking to the walkway in front of the main building. [See Photos Transfer 1 and 2.](#)

The donation bins (Planet Aid, Salvation Army, St. Vincent dePaul) are at heights which exceed acceptable reach standards under ADA by 3" to 12". In addition, the St. Vincent DePaul bin requires more than 5 lbs. of force to use. The bins are located on loose stone, which is not an acceptable base as an accessible route of travel. [See Photo Transfer 3.](#)

There is no signage at the facility informing users how to obtain assistance if needed. It is recommended that uniform signage be provided throughout the facility for those in need of assistance including those with mobility limiting disabilities. The signs should also explain "how" an attendant can be contacted for such assistance to put items in bins or containers. This information should also be posted on the town's website.

Main Building Employee Only Areas

- The main building has an employee only break room on an upper level accessible only by stairs. The stairs have open risers; railings that are 4" too low, which do not fully extend the full length of the stairs on one side, are not round or oval in shape, and lack bottom extensions. [See Photo Transfer 4.](#)
- A bathroom in the break room is wholly non-compliant with no tactile designation signage; knob style hardware; a sink that lacks knee clearance; a water closet that is 1" too low, and lacks near, far, and front clearances; no grab bars; a toilet paper dispenser that is not mounted adjacent to the water closet; and a mirror and a towel dispenser that are too high. [See Photo Transfer 5.](#)
- The three doors in the building (front office, break room, break room bathroom) have knob-style hardware and lack tactile designation signage. [See Photo Transfer 6.](#)

As transfer station employees must meet certain physical standards to be able to lift and assist transfer station patrons, modifications to the building, stairs, and doors would only be required as a result of a reasonable accommodation request.

Recommendations

- Construct a ramp in the parking space farthest from the front office so that individuals with mobility limiting disabilities can access the walkway to the trash disposal open windows. Estimated Cost: TBD – up to \$20,000+.
- Stripe an 8' wide designated van accessible parking space with an 8' wide access aisle adjacent to the ramp (to be constructed). Provide van accessible parking signage. Estimated Cost: \$250.
- Implement a policy providing assistance to those in need including those with mobility limiting disabilities. This should include signage at the facility detailing how one can obtain assistance and also posted on the town's website.
- As feasible, provide bins within reach range and relocate so that they are on an accessible route of travel.
- Install signage at the Transfer Station and provide information on the Town's website as to how those with mobility limiting disabilities can receive assistance as needed. Estimated Cost: \$100.00.

Total Estimated Cost: Up to \$20,350+

Millbury Transfer Station Accessibility Assessment Photos



Photo Transfer 1



Photo Transfer 2



Photo Transfer 3

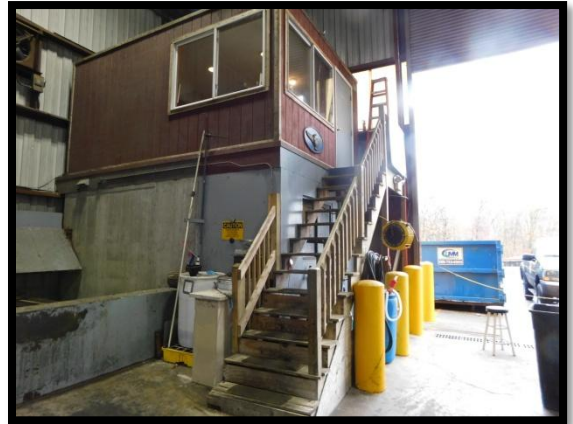


Photo Transfer 4



Photo Transfer 5



Photo Transfer 6

GRASS HILL SCHOOL BUILDING

Description of Facility and Programs: Grass Hill School is a 2-story wooden frame structure that was built in 1861 and operated as a school until 1968. The building is under lease to the Millbury Historical Society by the Town of Millbury. The Society is undergoing restoration efforts of the building with plans to make the first floor accessible.



Responsible Party: Board of Selectmen, Millbury Historical Society.

General Description or Obstacle Which Limits Mobility or Access:

Exterior

There is no designated accessible parking and no accessible route of travel into the building.

The front stairs have $\frac{3}{4}$ " unbeveled nosings. There are no railings for the actual stairs with a rectangular railing located on the landing.

Main Level

The main level has 3 doors that lack tactile designation signage and 2 doors, including the front door with knob style hardware.

The bathroom has door hardware that requires pinching and twisting of the wrist and a latch that is 2" too high and requires pinching and use of the fingers. The doorway threshold is $\frac{3}{4}$ " high. The mirror is $1\frac{1}{2}$ " too high. The water closet is 3" too far from the near wall. There are no grab bars for the water closet.

Level 2

The first 3 steps of the stairs lack railings. The mid segment of the stairs have a railing on one side only. The upper segment of stairs are up to 2" too high and lack top and bottom extensions. Four doors lack tactile designation signage with one door also having knob-style hardware. A bathroom is wholly non-compliant and has a 1" abrupt change in level surface at the threshold. The bathroom is not in service and is not intended to be put back into service. The second level is closed to the public and used solely for storage at the present time.

Note: As this area is closed to the public, modifications should be limited to the installation of compliant stair railings. Further modifications would only be required as a result of a reasonable accommodation request.

If the second level is used to display items in the future, then the items on display must be made available for viewing by all. This can be accomplished by creating a printed descriptive catalogue with photographs of those items on the second level as well as a CD/Flash Drive which both depicts and describes the same. A viewing area can be created on the main level to accommodate a viewing area of the catalogue as well as a place (with proper equipment) to watch the CD/Flash Drive. Upon request, an individual with a mobility limiting disability who wants to see an item directly, could have that item retrieved (as feasible) and brought to the designated first floor viewing area. A formal posting of the policy and practice would need to be posted on the first floor of the building, on all building literature and pamphlets, as well as on the building's website

Grass Hill School Building Accessibility Assessment

<u>General Description of Obstacle</u>	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
<u>Parking</u> There are no designated accessible parking spaces inclusive of access aisle and signage.	502 703.7.2	23	Pave, stripe, and designate at least one van accessible parking space and one passenger vehicle accessible parking space. The van accessible space s/b at a width of either 11' with a 5' access aisle or 8' wide parking space with an 8' access aisle (2010 ADA Standards). The passenger vehicle accessible space s/b 8' wide with a 5' access aisle. Signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located no more than 10' in front of the space. Van accessible signage s/b provided at the van accessible space. Slopes for the parking and access aisles should not exceed 2.0% in any direction.	1	3	N	Up to \$10,000+
<u>Accessible Route of Travel</u> There is no accessible route of travel to the building.	206.2.1 403	20.2 22	An accessible route of travel needs to be provided to all areas available to the public. Construct an accessible route of travel fully to the building front entrance. The accessible route of travel must be compliant with width (48" per 521 CMR) and slope (2% max. cross, 5% max. running) requirements as well as changes in level surface (no > than ¼" unbeveled or between ¼" and ½" beveled w/a slope of no > 1:2). Construction options include compacted stone dust, asphalt or similar surfaces that meet the requirement of stable, firm, and slip resistant. Costs will vary depending on material used.	1	3	N	Up to \$5,000+

Front Entrance The front stairs have ¾" unbeveled nosings. There are no railings for the actual stairs with a rectangular railing located on the landing. There is no accessible route of travel into the building. See Photo Grass Hill 1.	504.5	27.3	In order to achieve accessibility at the sole main entrance door, the stairs will need to be replaced with a ramp in accordance with Sections 405 and 505 of the 2010 ADA Standards and Section 24 of 521 CMR. Actual costs will vary according to construction type and materials.	1	3,4	N	TBD – up to \$75K+
	505	27.4					
	206.2.1	20.1					
Door Hardware The front main door, basement, egress door have knob-style hardware. See Photo Grass Hill 2.	404.2	26.11	Replace the hardware with lever style or similar compliant door hardware.	1, 2	2	I	\$300
Door Signage Tactile designation signage is not provided on the basement, bathroom, and egress doors. See Photo Grass Hill 2.	703	41.1	Install accessible compliant tactile designation signage so that it is located on the latch side of each door with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Under 521 CMR, signage s/b 60" a.f.f to the centerline of the sign. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards). Accessible bathrooms must also include the Universal Symbol of Accessibility.	2, 3	2	I	Up to \$150
Interior Stairs The front stairs have ¾" unbeveled nosings. There are no railings for the actual stairs with a rectangular railing located on the landing. See Photo Grass Hill 3.	504.5	27.3	Modify the underside of the nosings so the projections do not exceed ½".	2	2	N	Up to \$3,000
	505	27.4	Install compliant continuous railings at a height of 34" – 38" to the top of the handrails, round or oval in x-section and between 1¼" – 2" in outside diameter, with extensions at the top 12" parallel to the floor and at the bottom the slope distance of one tread then 12" parallel to the floor.				
Bathroom The bathroom has door hardware that requires pinching and twisting of the wrist. The latch-style locking mechanism is 2" too high and requires pinching and use of the fingers. The doorway threshold is ¾" high. The mirror is 1½" too high. The water closet is 3" too far from the near wall. There are no grab bars for the water closet. See Photo Grass Hill 4, 5, and 6.	404.2	26.11	Replace the hardware with lever style hardware.	3	2	I	\$100
	404.2	26.11	Replace the locking mechanism with dead bolt style that does not require pinching or twisting of the wrist and be used with a closed fist or loose grip. The locking mechanism should not exceed 48" in height.	3	2	I	\$75
	404.2.5	26.10	Modify the threshold so it is no more than ¼" unbeveled or ¼" to ½" beveled with a no more than 1:2 slope.	3	2	I	\$100
	603.3	30.11	Due to the historic appearance of the mirror framing, seek a variance to retain the existing mirror.	3	1	I	\$0
	604.2 604.3	30.7.2	Block out the near wall 3 inches to create the 18" o.c. of the water closet to the near wall.	3	2	N	Up to \$300
	609 604.5	30.7.2	Install 42" side and rear grab bars. The grab bars s/b 33" to 36" a.f.f., 1¼" to 1½" in diameter, and non-rusting or acid-etched. The side grab bar s/b no more than 12" from the interior corner and the rear grab bar no more than 6" from the interior corner.	3	2	N	\$350

Total of \$94,375+

Grass Hill School Building Accessibility Assessment Photos



Photo Grass Hill 1



Photo Grass Hill 2



Photo Grass Hill 3



Photo Grass Hill 4



Photo Grass Hill 5



Photo Grass Hill 6

DOROTHY MANOR SCHOOL BUILDING

Function and Description of Facility and Programs: The Dorothy Manor School Building is a former public elementary school building that is currently leased by a private educational facility known as OneSchool Global. OneSchool Global does not intend to occupy the building for the 2023-2024 school year. The circa 1900 building is a multi-level masonry structure totaling roughly 4,635sf. The future use of this building is undetermined and therefore only a cursory assessment of general non-compliance is provided.



Responsible Party: Board of Selectmen, School Committee

General Description or Obstacle Which Limits Mobility or Access: The former elementary school building is predominately non-compliant under both the 2010 ADA Standards for Accessible Design and the 521 CMR Massachusetts Architectural Access Board Regulations.

Parking

The sole designated accessible parking space lacks signage and is not “van accessible” as the access aisle is only 5 feet wide. [See Photo DMS 1.](#)

Exterior Stairs, Railing, and Accessible Route of Travel

The front concrete walkway is severely deteriorated with excessive heaving and abrupt changes in level surface. [See Photos DMS 2 and 3.](#)

The concrete stairs (front and 2 side entrances) are weathered and deteriorated, not uniform in height, and in some areas exceed the maximum rise of 7 inches. [See Photos DMS 4 and 5.](#)

The front entrance exterior stairs have railings that are not round or oval in shape; are only 30" a.f.f. to the top of the gripping surface, which is 4" too low; and lacks top and bottom extensions. [See Photo DMS 5.](#)

The side entrance stairs have railings that do not go the full length of the stairs and lack bottom extensions. [See Photo DMS 4 and 6.](#)

Chain link gates along exterior accessible routes of travel do not have a smooth surface on the push side of the gate 10" from the ground surface as required under the 2010 ADA Standards.

There is no accessible means of entry into the building as the only access is via stairs or a 5 inch abrupt change in level surface into the basement followed by stairs. [See Photo DMS 7.](#)

Internal Routes of Travel

There is no internal accessible route of travel between levels – basement, main level, and the "mezzanine" offices. Vertical access is required via an elevator, limited use elevator, or a vertical wheelchair lift. Under most construction options additional compliance requirements would be triggered and in the case of an elevator or limited use elevator, full code compliance under 521 CMR due to the cost of the renovations vs. the value of the building may also be required. Vertical access modifications may also trigger additional structural, electrical, mechanical, fire alarm and possibly plumbing alterations and modifications depending on location and what is required. An electrical upgrade would also be in order to accommodate the powering of the equipment. Accounting for unforeseen costs (15% contingency), demolition, finishes, general conditions including overhead and profit (20%), architect oversight, compliance with prevailing wage, and historic rehabilitation considerations (if applicable), construction costs would be considerable. The project architect would may also need to consult with the Massachusetts State Historic Preservation Officer (if considered historic) as well as the Massachusetts Architectural Access Board to determine what exemptions may be considered and then file the formal variance request as may be required.

The internal stairs between levels have railings that are non-compliant. The front entrance stairs have railings are 3" wide and not round or oval in shape and lack compliant top and bottom extensions. The side stairs for the basement, main, and second levels that are located on the ends of the building lack railings in entirety. [See Photos DMS 8, 9, and 10.](#)

The Main Level hallway defibrillator is a protruding object as it extends 7" into the accessible route of travel at a height of 52" a.f.f. to the bottom of the defibrillator. [See Photo DMS 11.](#)

Two (2) hallway floor heating grates have grate openings of 1", which exceeds the maximum allowed opening of ½". [See Photo DMS 12.](#)

Although not currently on an accessible route of travel the front and side double doors have glass panes of 46" to 51" a.f.f., which exceeds the maximum allowed of 43" a.f.f., under the 2010 ADA Standards. If any of these doorways are made part of an accessible route of travel in the future, then the glass panes will need to be frosted/blocked or modified/lowered so that they are no more than 43" a.f.f. to the bottom of the glass.

Exterior and Interior Doors

Exterior and interior doors with closers exceed the maximum allowed operating force and do not meet the minimum required closing speed. Eight (8) doors have non-compliant knob-style hardware. Fifteen (15) doors lack tactile designation signage. The Student Support Office has only 29" of doorway clear width, which does not meet the minimum required 32". [See Photos DMS 13 and 14.](#)

Reach Range

A minimum of fifteen (15) office/classroom, hallway, and bathroom light switches are 4" to 7" too high. The Main Level hallway defibrillator, first aid kit, and "Lifogen" are not within the reach range of 48" under the 2010 ADA Standards. The Elementary Learning Center classroom towel dispenser and first aid kit is too high.

Sinks

The Main Level Hallway, Secondary Learning Center Room, and Elementary Learning Center Room have sinks that lack knee clearance. In addition, the Elementary Learning Center Room sink is 2 inches too high and the Main Level Hallway sink has non-compliant faucets that require pinching and twisting of the wrist. [See Photos DMS 15 and 16.](#)

Bathrooms

Bathrooms are located on the Main Level (Men's and Women's) and on the Mezzanine Level in the Student Support Office.

The Student Support Office bathroom has only 22" of clear width at the doorway; lacks compliant near and front water closet clearance; lacks grab bars; has a water closet flush control that is on the wrong side; has a sink that is 2" too high and which has piping that is not wrapped, guarded, or insulated; has dispensers and a mirror that are too high; has a toilet paper dispenser that is too close to the front of the water closet; and has a non-compliant "eye hook" locking mechanism that requires pinching and twisting of the wrist and which is too high. [See Photos DMS 17, and 18.](#)

The Main Level Men's bathroom has a sink with only 22¾" of knee clearance (27" minimum required); a mirror that is too high; sink piping that is not wrapped or insulated; a stall door that is not fully self-closing and which has a coat hook that is 17" too high; a toilet paper dispenser that is too close to the water closet; and a water closet that lacks grab bars and which is 3½" too close to the near wall and 32½" too close to the stall door (front of water closet). [See Photos DMS 19 and 20.](#)

The Main Level Women's bathroom has a student sink with only 23¾" of knee clearance (27" minimum required) and with piping that is not wrapped or insulated; a staff sink that lacks knee clearance; a mirror and a towel dispenser that are too high; a toilet paper dispenser that is too far from the front of the water closet; and a water closet that lacks grab bars and which is 17½" too close to the far wall. [See Photos DMS 21 and 22.](#)

Dorothy Manor School Building Assessment Photos



Photo DMS 1



Photo DMS 2



Photo DMS 3

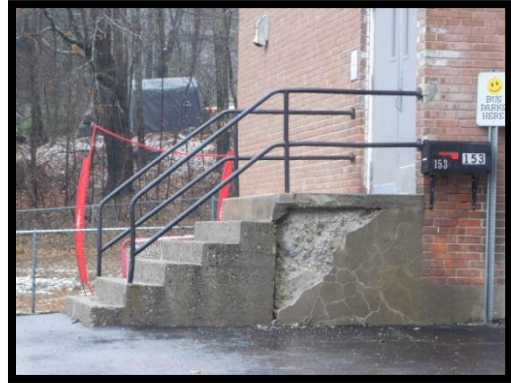


Photo DMS 4



Photo DMS 5



Photo DMS 6



Photo DMS 7



Photo DMS 8

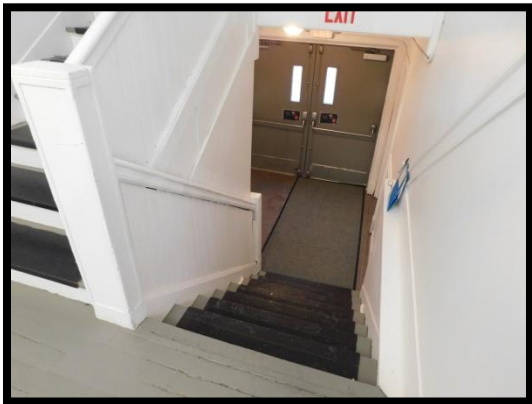


Photo DMS 9

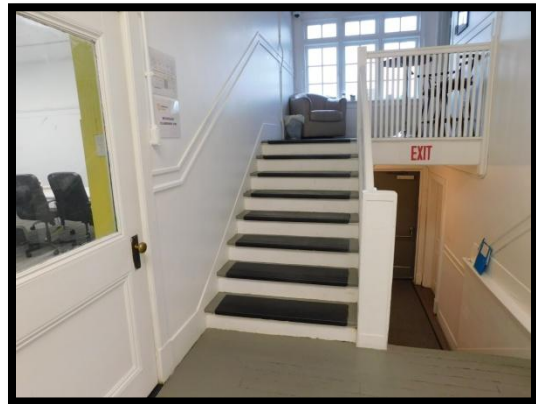


Photo DMS 10

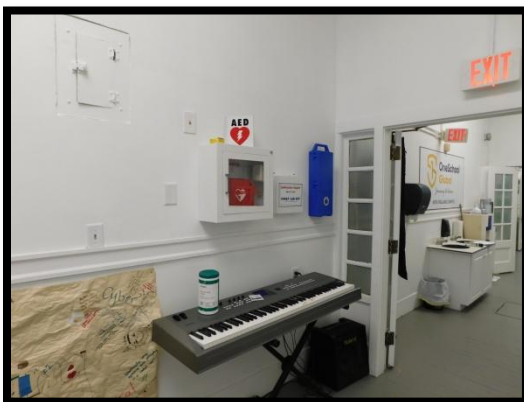


Photo DMS 11

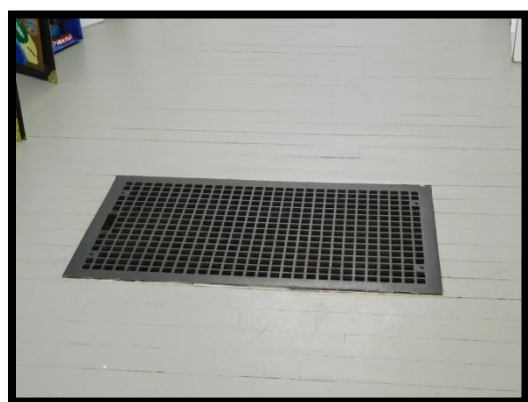


Photo DMS 12



Photo DMS 13



Photo DMS 14



Photo DMS 15



Photo DMS 16

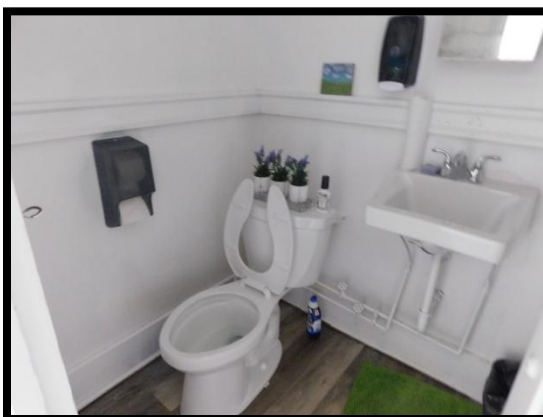


Photo DMS 17



Photo DMS 18



Photo DMS 19



Photo DMS 20



Photo DMS 21



Photo DMS 22

ASA WATERS MANSION

Description of Facility and Programs: The former home and mansion of Asa Waters II was constructed in 1826–1829. The building and property had numerous uses and occupancies over the years with the Town of Millbury taking ownership in 1977. As the building had deteriorated over the years, local private and public efforts restored the property to serve as both an historical site, museum, community event space, and private rental space.

The building consists of 3 levels and an attic space. Meeting and activity space is located on the first floor. The second floor consists of offices, changing facilities for weddings and related events, a bathroom, museum space, and other rooms. The third level houses a Christmas Village display which is open for limited viewing during the holiday season.



Responsible Party: Board of Selectmen

General Description or Obstacle Which Limits Mobility or Access: The first level of the Asa Waters Mansion and the outside grounds are “reasonably” accessible but with various areas of non-compliance. The second level and third levels of the house lack vertical access and are inaccessible with controlled public access. The attic area is closed to the public in entirety.

Parking

The signage for the designated accessible parking is too low.

Accessible Entrance

There is no directional signage in front of the building noting the location of the accessible entrance.

Exterior Stairs, Railings, Walkways, and Ramp

The railings at the front stairs on Elm Street are not fully round or oval in shape and lack bottom extensions.

Side egress stairs have railings on one side only, are not round or oval in shape, and lack bottom extensions.

The on-grade entrance from the sidewalk on School Street has a 1" to 2" abrupt change in level surface at the transition from asphalt to granite.

The walkway to the outside events pad consists of unstable and loose stone. In addition, there is a 1" to 2" abrupt change in level surface at the transition from walkway to cement pad.

The walkway to Town Hall has an excessive running slope of 6.5% to 22.0% for a distance of roughly 50 feet.

The ramp to the accessible rear entrance has a running slope 8.6% to 8.8% for approximately 6 to 8 feet on the first leg of the aluminum ramp.

Gazebo

The stair railings are rectangular and not round or oval in shape and lack top and bottom extensions.

Level 1 General

Interior doors lack tactile designation signage and have non-compliant knob style hardware. A hallway coat rack between the 2 bathrooms is 12" too high and also serves as a protruding object.

Level 1 Bathrooms

The Ladies Bathroom lacks tactile designation signage. The water closet is 4" too far from the near wall, 6" too close to the far wall, and has the flush control on the wrong side. The toilet paper dispenser is too close to the front of the water closet. The sink lacks knee depth and is 2" too high. The side grab bar is 6" too short, ¾" too high, and is not roughened or etched. There is no rear grab bar. The waste basket is operable by foot only.

The Unisex Bathroom lacks tactile designation signage. The water closet is 4" too far from the near wall, and 6" too close to the far wall. The toilet paper dispenser is too close to the front of the water closet. The sink lacks knee depth and is 2" too high. The side grab bar is 6" too short. The waste basket is operable by foot only.

Interior Stairs

The interior staircase on the first level has reduced headroom resulting in a protruding object. In addition, there is a railing on one side only. The existing historic railing is 4" too low and lacks bottom extensions.

The stairs by the bathrooms have railings that are 10" too low, lack bottom extensions, and have a railing on one side only.

Level 2

There is no vertical accessible route of travel to the second level. Approximately 17 doors lack tactile designation signage and have non-compliant knob style hardware. Stairs between the office area and museum have a railing that is only on one-side, is 4" too low, and lacks compliant top and bottom extensions. Hallway hanging lights are only 77" a.f.f., which is 3" too low for head clearance. A bathroom has a pedestal-style sink that impedes knee clearance. The mirror, light switch, and door locking mechanism are too high and the toilet paper dispenser is located behind the water closet. The

water closet has the flush control on the wrong side, lacks grab bars, and has insufficient maneuverability and water closet clear widths.

Note: As this area is closed to the public, modifications should be limited to tactile designation signage and stair railings. A historic variance should be sought for the hallway hanging lights. Doors (as feasible) should be left in an open position when the floor is open to the public. Further modifications, including to the bathroom would only be required as a result of a reasonable accommodation request.

Level 3

There is no vertical accessible route of travel to the third level. Approximately 9 doors lack tactile designation signage and have non-compliant knob style hardware. Some doorways have insufficient clear widths. Light switches are up to 3" too high.

Note: As this area is closed to the public, modifications should be limited to tactile designation signage. Further modifications would only be required as a result of a reasonable accommodation request.

Comment on Bathrooms:

The Level 2 bathroom is not on an accessible route of travel and is not accessible. The Main Level Ladies Bathroom is not designated as accessible and is not accessible compliant. These bathrooms would only need to be modified due to a reasonable accommodation request. Bathroom modifications are limited to the Main Level Unisex Bathroom.

Level 2 and 3 Alternative Access to Museum and Holiday Displays:

Current Practice: Museum

As the cost to make the 2nd and 3rd levels of the Asa Waters Museum would not only be extremely expensive and unreasonable, it would also significantly alter the interior of this historic property. The Historic Commission and volunteers have enacted measures to make items in the Museum on the 2nd level viewable without providing direct physical access. This has been achieved via access to CD viewing equipment on the first level showing the items on display in the Museum.

Current Practice: Second and Third Floors

A flip chart with photographs is available on the first floor showing the rooms on the second floor of the Asa Waters Mansion and their contents and displays. Under "The Knot" web page for Asa Waters Mansion, users can get a visual tour of portions of the first and second floors as well as some of the grounds. There is no visual display of the holiday display on the third floor.

Recommended Actions

Catalogue

It is recommended that a catalogue of both the Museum contents and the rooms and displays on Levels 2 and 3 be provided in a permanent location on the first floor.

On-line Virtual Tour

Although it is noteworthy to provide such a service on its website, the virtual tour should be enhanced to include the entirety of the grounds and all 3 floor levels and accompanied by a narrative describing the items or rooms/locations being viewed. A dedicated computer station with compliant knee width, knee depth and knee height for visitors to use to access the website virtual tour should also be located on the first level of the building. museum.

Asa Waters Mansion Accessibility Assessment

<u>General Description of Obstacle</u>	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
<u>Parking</u> The signage for the designated accessible parking is 12” too low. See Photo Asa Waters 1.	502.6	23.6	Signage must be set such that the signage height should be a minimum of 60” high at the bottom (2010 ADAAG Standards) and a maximum of 96” at the top (MAAB 521 CMR) and located no more than 10’ in front of the space.	1	2	I	\$0
<u>Directional Signage</u> There is no directional signage at the front of the building noting the location of the accessible entrance.	216	41.1.3	Install directional signage at the front of the building noting the location of the accessible entrance.	1	2	I	\$250
<u>Gazebo</u> The stairs have railings that are rectangular in shape, are 5” wide, and lack top and bottom extensions. See Photo Asa Waters 2.	505	27	The railings should be replaced with ones that are round or oval in shape, 1¼” – 2” in outside diameter, have top extensions that are 12” parallel to the floor, have bottom extensions that are the slope distance of one tread then 12” parallel to the ground, and are 34” to 38” a.f.f. to the top of the railings.	1	3	I	Up to \$2,500
<u>Exterior Stairs, Railings, Walkways, and Ramp</u> The railings at the front stairs on Elm Street are not fully round or oval in shape and lack bottom extensions. Side egress stairs have railings on one side only, are not round or oval in shape, and lack bottom extensions. The on-grade entrance from the sidewalk on School Street has a 1” to 2” abrupt change in level surface at the transition from asphalt to granite. The walkway to the outside events pad consists of unstable and loose stone. In addition, there is a 1” to 2” abrupt change in level surface at the transition from walkway to cement pad. The walkway to Town Hall has an excessive running slope of 6.5% to 22.0% for a distance of roughly 50 feet. The ramp to the accessible rear entrance has a running slope 8.6% to 8.8% for approximately 6 to 8 feet on the first leg of the aluminum ramp. See Photos Asa Waters 3, 4, 5, and 6.	505 403 403 403 405.2	27 20 22 20 22 20 22 24.2	The railings should be replaced with ones that are round or oval in shape, located on both sides of the stairs, 1¼” – 2” in outside diameter, have top extensions that are 12” parallel to the floor, have bottom extensions that are the slope distance of one tread then 12” parallel to the ground, and are 34” to 38” a.f.f. to the top of the railings. The walkways should be modified as required such that the accessible routes of travel are compliant with slope (2% max. cross, 5% max. running) requirements as well as changes in level surface (no > than ¼” unbeveled or between ¼” and ½” beveled w/a slope of no > 1:2). Surfaces must be firm, stable, and slip resistant. See above. See above.	1 1 1 1	3 2 2 3	I I N	Up to \$3,500+ \$100 Up to \$2,500+ TBD
<u>Reach Range and Protruding Objects</u> The coat rack is 60” a.f.f., which is 12” too high under the 2010 ADA Standards. Light switches are up to 3” to 4” too high.	308	6.5 6.6	Provide a coat rack or coat hooks that are no more than 48” a.f.f. Lower light switches only as required due to a reasonable accommodation request.	4	2	I	\$0

<p>The coat rack is a protruding object as it extends more than 4" into the accessible route of travel at a height between 27" and 80" a.f.f.</p> <p>The central stair case on the main level has reduced headroom of less than 80" a.f.f. The 2nd level hallway lights have only 77" of headroom, which is 3" too low.</p> <p>See Photos Asa Waters 7 and 8.</p>	307.2	20.6.1	Erect small wing walls near the floor at the ends of the coat rack for cane detection.	4	2	I	Up to \$200
	307.2	20.6.1	Placed a fixed object under the stairs for cane detection. Seek a variance for the hallway lights due to the limited use and historic nature of the building.	4	1	I	\$0
<p><u>Main, Second, and Third Levels Door Hardware</u></p> <p>Main, second, and third level doors have non-compliant knob style hardware.</p>	404.2	26.11	As most of the doors have hardware that is either historically correct or original to the building and the building is on the Historic Register, keep the doors in an open and fixed position when open to the public. Modifications (change to lever style) would only be required due to a reasonable accommodation request.	2	1	I	\$0
<p><u>Main, Second, and Third Levels Door Signage</u></p> <p>Tactile designation signage is not provided on doorways in the main, second, and third levels (including bathrooms). Signage is not provided at approximately 42 doorways.</p> <p>See Photo Asa Waters 9.</p>	703	41.1	Install and/or relocate accessible compliant signage so that it is located on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Under 521 CMR, signage s/b 60" a.f.f. to the centerline of the sign. Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards). Accessible bathrooms must also include the Universal Symbol of Accessibility.	2, 3	2	I	Up to \$2,100
<p><u>Interior Stairs</u></p> <p>The historic central staircase has only one railing. The existing historic railing is 4" too low and lacks a compliant bottom extension.</p> <p>The stairs by the bathrooms has a railing on one side only, is 10" too low, and lacks a bottom extension.</p> <p>The Level 2 stairs between levels has a railing on one side only, is 4" too low, and lacks compliant top and bottom extensions.</p> <p>See Photo Asa Waters 10 and 11.</p>	505 505 505	27 27 27	Seek a variance to retain the existing railing main level railings. On the opposite side of the existing railings on the main level and on the second level, install compliant continuous railings at a height of 34" – 38" to the top of the handrails, round or oval in x-section and between 1½" – 2" in outside diameter on the side of the stairs with no railing. As feasible and consistent with the historic integrity of the stairs, provide extensions at the top 12" parallel to the floor and at the bottom the slope distance of one tread then 12" parallel to the floor.	2	2	N	Up to \$20,000
<p><u>Main Level Unisex Bathroom</u></p> <p>The water closet is 4" too far from the near wall, and 6" too close to the far wall.</p> <p>The toilet paper dispenser is 4" too close to the front of the water closet.</p>	604.2 604.3 604.7	30.7.2 30.7.6	Modify the water closet so that it is 18" o.c. from the near wall and 42" o.c. from the far wall. Relocate the toilet paper dispenser so it is 7" minimum and 9" maximum in front of the water closet measured to the centerline of the dispenser.	3 3	3 2	I I	TBD – up to \$10,000 \$0

The sink lacks knee depth and is 2" too high.	606.3 306.3	30.9.2 30.9.3	Replace the sink with one that is no more than 34" a.f.f. to the top, provides 27" of knee clearance, and 19" of knee depth.	3	3	1	Up to \$2,000
The side grab bar is 6" too short.	604.5	30.8	Replace the grab bar with one that is 42" long.	3	2	1	\$250
The waste basket is operable by foot only. See Photo Asa Waters 12.	309.4	39.5	Modify the wastebasket so that it can also be used with a closed fist or loose grip.	3	2	1	\$50

Total of \$43,450+

Asa Waters Mansion Accessibility Assessment Photos



Photo Asa Waters 1



Photo Asa Waters 2



Photo Asa Waters 3



Photo Asa Waters 4



Photo Asa Waters 5

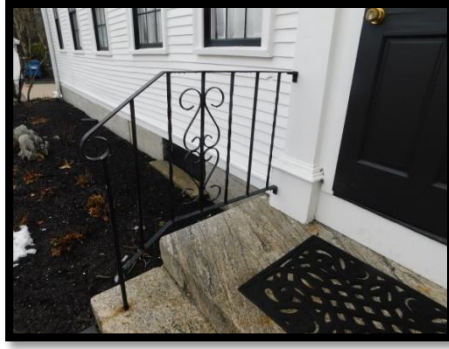


Photo Asa Waters 6



Photo Asa Waters 7

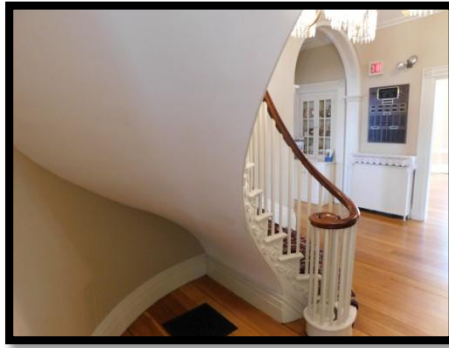


Photo Asa Waters 8

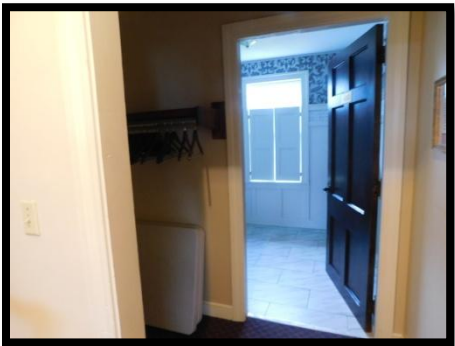


Photo Asa Waters 9

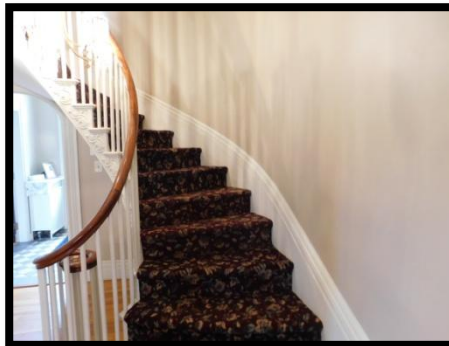


Photo Asa Waters 10

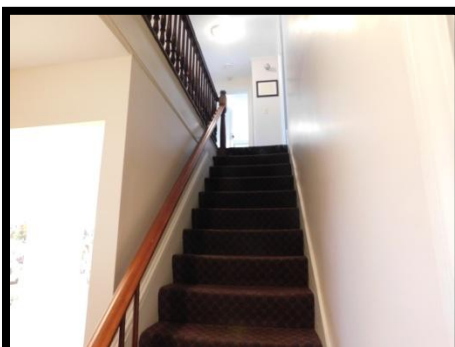


Photo Asa Waters 11



Photo Asa Waters 12

RAYMOND E. SHAW ELEMENTARY SCHOOL

Description of Facility: Raymond E. Shaw Elementary School a 2-story masonry building totaling roughly 90,000 square feet and certified to house approximately 550 students from grades 3 - 6. The school construction was substantially completed in late 2022, with on-going “punch-list” items in process at the time of assessment in January 2023.



Responsible Party: Board of Selectmen and School Committee.

2010 ADA Standards and 521 CMR Standards for Children: Both the 2010 ADA Standards and 521 CMR have advisories and/or varied standards for some items and elements for children according to age (2010 ADA Standards) or grade level (521 CMR). In some cases, there is limited room for interpretation but the guidance is in place as to what is applicable per different range of grade levels or age groups. ADA differentiates according to age level, with those being Ages 3 and 4, Ages 5 through 8, and Ages 9 through 12. 521 CMR differentiates according to grade level, with those being Pre-kindergarten, Kindergarten through 3rd Grade, and 4th Grade through 6th Grade. Grades 7 through 12 would follow the regular ADA or 521 CMR Standards as applied to adults. For the purposes of this assessment, the following standards were applied to the student and adult areas at the Shaw School:

	<u>2010 ADA Standards</u>	<u>521 CMR Standards</u>
Classrooms/Student Common Areas	Ages 9 - 12	Grades 4 – 6
Student Bathrooms	Ages 9 - 12	Grades 4 – 6
Adult Only Areas	Adult	Adult

Bathroom Standards for Grades 4 – 6 (Ages 9 – 12)

Toilet Centerline	15" to 18" o.c. to the near wall
Toilet Seat Height	15" to 17" a.f.f. to the top of the seat
Toilet Paper Dispenser Height	17" to 19" a.f.f.
Urinal	15" a.f.f. (maximum) to the rim
Grab Bar Height	25" a.f.f. to 27" a.f.f. to the top of the gripping surface
Grab Bar Location	No greater than 6" from the interior corner
Sink Height	No greater than 30" a.f.f. to top
Sink Knee Clearance	At least 25" a.f.f.
Mirror Height	No greater than 31 a.f.f. to the bottom of the reflecting surface
Reach Range	See below.

Bathroom Reach Range Standards for Grades 4 – 6 (Ages 9 – 12)

2010 ADA Standards

Section 308.1 of the 2010 ADA Standards provides guidance on reach ranges according to age in areas used primarily by children. The guidance for the reach range for Students Ages 9 through 12 is 16" (low minimum) to 44" (high maximum).

521 CMR

Section 30.19 of 521 CMR (Children's Dispensers) states that "towel dispensers, drying devices, or other types of devices and dispensers shall have at least one of each device mounted within the *zone of reach*, and at least one of each device shall be located within reach of a person using the accessible sink.

- Section 5.00 (Definitions) defines *zone of reach* as an "operable mechanism is within reach if it meets either criteria outlined in 521 CMR 6.5 (Forward Reach) or 521 CMR 6.6 (Side Reach)".
- Section 6.5 (Forward Reach) identifies the maximum high forward reach as 48" a.f.f. and minimum low forward reach as 15" a.f.f.
- Section 6.6 (Side Reach) identifies the maximum high side reach as 54" a.f.f. and minimum low forward reach as 9" a.f.f.

Section 30.20 of 521 CMR (Children's Controls and Receptacles) states that "if controls, receptacles, or other equipment are provided, then at least one of each shall be mounted no higher than 36 inches above the floor to the centerline of the operable portion of the control".

Section 30.6 of 521 CMR (Adult Toilet Stalls) requires that a coat hook be provided in accessible stalls at a maximum of 54" above the floor (30.6.1.d).

Section 30.12 of 521 CMR (Adult Dispensers) states that "towel dispensers, drying devices, or other types of devices and dispensers shall have at least one of each device mounted within the zone of reach" and as referenced in Figure 30i. Figure 30i identifies the reach range height for dispenser as 42" a.f.f. to the centerline of the operable portion of the dispenser.

Reach Range Variations

Based on the above, the reach range for bathroom dispensers varies up to **44" a.f.f.** for Children ages 9 – 12 under the ADA Standards but under 521 CMR is **42" a.f.f.** for adults. The reach range for dispensers for children's bathrooms is **48" a.f.f. (forward reach) to 54" a.f.f. (side reach)** based on 521 CMR Sections 30.19, 5.0, 6.5, and 6.6. The reach range for controls and receptacles in children's bathrooms is **36" a.f.f.** based on 521 CMR Sections 30.20

According to these conflicting standards, the reach range for a children's dispenser could be mounted 2" higher than that for adults under the 2010 ADA Standards and up to 12" higher under 521 CMR. This clearly does not appear to be the intent of either Standard as common sense would dictate that a children's reach range should be lower than an adult's reach range.

Recommendation

Considering the intent of the Standards and Regulations to have lower heights and ranges for children according to age or grade level, it is recommended that the dispenser heights and coat hooks in children's bathrooms should follow Section 30.20 of 521 CMR which would result in heights of no more than 36" a.f.f. to the centerline of the operable portion of the dispenser or the coat hook.

General Description or Obstacle Which Limits Mobility or Access:

EV Charging Stations

There are six (6) EV charging stations, two (2) of which are located on a level surface (2.0% or less slopes in any direction). The payment slot/operating mechanisms are 6" too high (54" from asphalt parking space) and require a 36" reach to access the controls. In addition there is no access aisle to the charging station for designated wheelchair access. Additional guidance on EV Charging Stations is provided in Chapter VI of this Plan.

Common Areas and General

Interior and exterior doors with closers have operating forces and closing speeds which exceed that allowed. Some doors/rooms lack tactile designation signage, have signage that is improperly located, or signage that is missing or blocked. Protruding objects (fire extinguisher and AED signage) exist in the hallways and in common areas. The front entrance and Level 2 emergency phones are not within reach range. Drinking fountains are non-compliant.

Room sinks have bubblers that are too far from the outside edge and too high. Classrooms have unsecured rugs. In addition, items are stored under the accessible sinks restricting use.

Typically the desks and tables in classrooms did meet knee clearance and table/desk top height requirements, but in those instances where they did not the tables/desks could be adjusted and raised as needed or adjustable/compliant desks could be brought into a classroom to address an accommodation.

Cafetorium

None of the tables in the cafetorium provide compliant knee depth. There are no railings on the stairs to the stage from the cafetorium, nor on the stairs to the music room.

Music Room

The Music Room lockers have locking/operating mechanisms which require pinching and twisting of the wrist. The ramp to the music room has segments with running slopes in excess of 8.3% and railings that are too low.

Student Bathrooms

Mirrors are too high. Some of the bathrooms have water closets and grab bars that are too low. Most of the bathrooms have side grab bars that are too far from the interior corner. Toilet paper dispensers are too far from the front of the water closet. Some stall doors are not self-closing and open in and not out. Not all stall doors have pull devices. Most stalls have coat hooks that are too high. Air dryers serve as protruding objects.

Adult Bathrooms

One bathroom has a water closet that is too far from the near wall. Toilet paper dispensers are too far from the front of the water closets. Coat hooks are too high.

Kitchen

The kitchen area itself has numerous elements of non-compliance (dispenser reach range, sink knee clearance, sink knee height, sink knee depth, etc.). In addition, the staff bathroom has a mirror that is 2½" too high, a water closet that is ¾" too far from the near wall, and items stored in the bathroom that restrict clear width. As these areas are closed to public and require personnel who must meet certain physical requirements to perform the essential functions of their position, unless dictated by a request for a reasonable accommodation, no further action is required at the present time.

Classroom Sinks and Classroom Sinks with Bubblers

Typically school classrooms have sinks and/or sinks with bubblers (a.k.a. drinking fountains) in the classroom to allow children to wash their hands or to get a drink of water without leaving the classroom.

2010 ADA Standards

The 2010 ADA Standards addresses this as follows:

- Drinking fountains shall comply with Sections 307 (protruding objects) and 602 (drinking fountains).
- Clear floor space must adhere to Section 305 (generally 30" wide and a forward approach) with knee and toe clearance adhering to Section 306 (generally 9" a.f.f. toe clearance and 27" a.f.f. knee clearance). Section 606.2 allows a knee clearance of a minimum of 24" a.f.f. at lavatories and sinks used primarily by children ages 6 through 12 where the rim or counter surface is 31" maximum a.f.f.

Exception: A parallel approach complying with Section 305 is permitted for children's use (5 years and younger per Section 606.2) where the spout is 30" maximum a.f.f. and is 3½" maximum from the front edge.

- The spout outlet cannot exceed 36 inches a.f.f. (Section 602.4) and cannot be more than 5" from the front edge (Section 602.5).

- The spout shall provide a flow of water 4 inches high minimum with the angle of the water stream measured horizontally to the front face of the unit. For spouts located less than 3 inches from the front edge, the angle shall be 30 degrees maximum. For spouts located between 3 and 5 inches from the front edge, the angle shall be 15 degrees maximum (Section 602.6).
- Controls shall comply with Operable Parts (Section 309.4) such that they are operable with one hand and do not require tight grasping, pinching, or twisting of the wrist. The operating force cannot exceed 5 lbs.

521 Code of Massachusetts Regulations

The 521 Code of Massachusetts Regulations addresses this as follows:

- a) Section 12 specifically addresses sinks in classrooms under Section 12.4. Classroom countertops and sinks shall comply with 521 CMR 12.2.2 b, 12.2.2 c, and 12.2.2 d. These subsections require adherence to clear floor space (30" wide), knee clearance (30" wide, 27" high, 19" deep), and height (28" to 34" a.f.f.). In addition, Section 12.5 requires that drinking fountains in classrooms adhere to the requirements of Section 36.00 drinking fountains.
- b) Section 36.2 requires minimum clearances of 27" a.f.f. (knee), 30" (width), and 17" to 19" (depth). In addition, there must be a minimum of 30" wide clear width at the approach to the drinking fountain.
- c) Drinking fountain spouts must adhere to Section 36.3 which requires spouts to be located at the front of the unit with the water flow in a trajectory that is parallel or nearly parallel to the front of the unit. The spout shall provide a flow of water at least 4 inches high and the spout height be no more than 36" a.f.f. For a "square" bowl, the requirements are for the spout to be at the front of the bubbler (sink) and have a parallel water flow trajectory. A round or oval bowl should have the spout positioned such that the flow of water is within 3 inches from the front edge.
- d) Controls shall be operable with one hand and not require tight grasping, pinching, or twisting of the wrist. The operating force cannot exceed 5 lbs. (Section 36.5).

Assessment and Comment

As noted above, there are both similarities and differences between the 2010 ADA Standards and 521 CMR. Two of the larger variations are the exception allowed under the ADA Standards for a parallel approach to the sink/bubbler for children 5 years of age and younger and what would also appear to be a farther allowed spout setback from the front edge. As both 521 CMR and the 2010 ADA Standards apply, the stricter of the two standards must be adhered to.

Based on an assessment of the Shaw Elementary School rooms and classrooms, it does not appear that the sink bubblers are in full compliance. The spout locations are roughly 5½" from the outside edge with water flows potentially more than 3" from the outside edge, both which would exceed that allowed under the 2010 ADA Standards and 521 CMR. In addition, the spout heights are 38" a.f.f., which is 2" too high for an accessible drinking fountain.

Raymond E. Shaw School Accessibility Assessment

General Description of Obstacle	2010 ADAAG	MAAB 521 CMR	Type of Action to be Taken	P	F	TF	Cost Estimate
<p>EV Charging Stations</p> <p>There are six (6) EV charging stations, two (2) of which are located on a level surface (2.0% or less slopes in any direction).</p> <p>The payment slot and operating mechanisms are 6" too high (54" from asphalt parking space) and require a 36" reach to access the controls. In addition there is no access aisle to the charging station for designated wheelchair access.</p> <p>Additional guidance on EV Charging Stations is provided in Chapter VI of this Plan.</p> <p>See Photo Shaw 1.</p>	308.2 308.3	6.5 6.6	<p>Although EV charging stations are not specifically addressed under the 2010 ADA Standards or 521 CMR, the Massachusetts Architectural Access Board and the U.S. Department of Energy provide guidance on charging stations (See Chapter VI of this Plan).</p> <p>The 2 spaces that are on a level surface should have striping for wheelchair access. The charging stations should be modified such that they are accessible and within reach range for a wheelchair user.</p>	2	3	I	TBD
<p>Exterior and Interior Doors</p> <p>Exterior and interior doors with closers (including bathrooms) do not fully comply with the maximum allowed operating force for an exterior door (15 lbs.), interior door (5 lbs.), and minimum closing speed requirement of 6 seconds under 521 CMR. Assessments ranged from 3 to 4 seconds closing speed and up to 18 lbs. operating force.</p>	404.2.8 404.2.9	26.8 26.9	Adjust door closers such that the push/pull force does not exceed 15 lbs for an exterior door and 5 lbs. for an interior door with door closing speeds of at least 6 seconds.	1, 3	2	I	\$0
<p>Door Signage</p> <p>Tactile designation signage is not provided at the following locations:</p> <ul style="list-style-type: none"> Gym (5 doors including egress) Level 2 Room #233 Level 2 Room #201 (1 hallway door of 2) Level 2 Room #201 (Outdoor Classroom) <p>Tactile designation signage is not located on the latch side of the door at the following locations:</p> <ul style="list-style-type: none"> Level 1 Room #100.3 Level 1 Room #129 Level 2 Room #231 Level 2 Room #217 <p>Tactile designation signage is mounted too high or too low at the following locations:</p> <ul style="list-style-type: none"> Level 2 Room #202 (62" a.f.f. o.c.) Level 2 Emergency Communication sign (77½" a.f.f. o.c.) 	703	41.1	<p>Install, replace, and/or relocate accessible compliant designation signage on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Under 521 CMR, signage s/b 60" a.f.f. to the centerline of the sign. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).</p> <p>In addition, signage should not be blocked.</p>	2	2	I	Up to \$900+

<ul style="list-style-type: none"> Student Bathrooms #105.1, #105.2, #121.1, #121.2, 145.1, #145.2, #225.1, #225.2, #207.1, #207.2 (42½" a.f.f. to 43" a.f.f.) <p>See Photos Shaw 2, 3, 4, 5, and 6.</p>							
<p>Protruding Objects</p> <ul style="list-style-type: none"> Level 1 and Level 2 fire extinguisher signs (approximately 16) – 5" out at 74" to 75" a.f.f. Level 1 and Level 2 AED signs (approximately 3) – 8¼" out at 68" to 72" a.f.f. Air dryers in Children's Bathrooms #145.1, 145.2, 225.1, 225.2, 207.1, 207.2, 105.1, 105.2, 121.1, 121.2, 118.1 are protruding objects with 9" protrusions at a height of 35½" to 36¼" a.f.f. <p><i>Protruding objects extend more than 4" into the accessible route of travel between a height of 27" and 80" a.f.f. or have vertical headroom clearance reduced to less than 80".</i></p> <p>See Photos Shaw 6 and 7.</p>	307.2	20.6.1	<p>Raise the signs so they are at least 80" a.f.f. to the bottom of the signs.</p> <p>Place a fixed item (i.e. waste basket) below the dispensers or erect wing walls on the sides of the dispensers.</p>	2 2	2 2	I I	\$0 \$0 to \$750
<p>Adult Reach Range</p> <p>The following exceed the maximum reach range height for an adult under the 2010 ADA Standards:</p> <ul style="list-style-type: none"> Level 1 Lobby emergency phone (64½" a.f.f.) Level 2 emergency phone (50" a.f.f.) <p>See Photos Shaw 6 and 8.</p>	308.2 308.3	6.5 6.6	The maximum reach range is 48" a.f.f. under the 2010 Standards. If these phones are intended to be used by school personnel and students and not limited to use by fire/emergency personnel then the phones s/b lowered such that the operating mechanisms are no higher than 48" a.f.f.	4	3	I	TBD
<p>Drinking Fountains</p> <p>The following are "low" drinking fountains with only 23½" to 24½" of knee clearance and spout heights of 30" to 30½":</p> <ul style="list-style-type: none"> Level 1 near #121 Level 1 near #105 Level 1 outside the gym Level 2 near #225 Level 2 near #207 <p>The following "high-low" drinking fountain has a "low" knee clearance of 24½" a.f.f. with a 30½" spout height and a "high" spout height of 35½" a.f.f. with 29¼" knee clearance:</p> <ul style="list-style-type: none"> Level 1 cafeteria <p>See Photo Shaw 9.</p>	306.3 306.2 602	36.2	<p>Option #1: If the "low" drinking fountains are intended primarily for students, then a variance s/b sought to allow for deviation from the minimum required 27" knee clearance under 521 CMR and to not require a "high-low" drinking fountain at each location.</p> <p>It is unclear as to the intent of the "high-low" drinking fountain as the "low" drinking fountain does not comply with 521 CMR for knee clearance. Although the "high" fountain complies with 521 CMR as a "low" drinking fountain for knee clearance and spout height, it does not meet the 38" to 43" spout height for a "high" fountain. These fountains s/b modified for 521 CMR compliance or a variance obtained to retain the existing drinking fountains as a "child low" and an "adult low".</p> <p>Option #2: Install compliant "high-low" drinking fountains per sections 306 and 602 of the 2010 ADA Standards and Section 36 of 521 CMR.</p>	2	1	I	TBD

Room Accessible Sink Bubblers Accessible sink bubbler spouts are located 5½" from the front edge which is ½" greater than allowed in rooms and classrooms. In addition, the spout heights are 38" a.f.f., which are 2" too high for an "accessible low" drinking fountain. This includes the following locations: <ul style="list-style-type: none"> Rooms #108, 110, 112, 113, 111, 019, 107, 103, 124, 126, 128, 129, 127, 125, 123, 140, 138, 118, 133, 228, 232, 234, 236, 237, 235, 233, 231, 202, 214, 216, 218, 217, 215, 213, 211, 201 The following sinks have bubblers with spout heights that are 2" too high and which are located behind the sink and set back approximately 18" to 21" from the edge: <ul style="list-style-type: none"> Nurse's Office, Room #139 See Photos Shaw 10 and 11.	602.5 602.6 602.4	36.3 36.4	As these spouts are within the industry standard tolerance for setback, no further action on setback is required. However, adjustments may be required to ensure that the water flow is within 3" of the edge. If the flow of water is not within 3" from the front edge, seek a variance to retain the existing spout locations. The bubbler/spout fixtures will need to be modified or replaced such that the spout height is no greater than 36" a.f.f.	2	3	I	TBD
	602.5 602.6 602.4	36.3 36.4	Modify the bubblers so that the spout heights do not exceed 36" a.f.f. The bubblers must be relocated such that they are no more than 5" from the front edge and project a flow of water within 3" from the front edge.	2	3	I	TBD
Accessible Sinks Items stored under the accessible sink restrict knee and toe depth The sink guard in the Classroom #125 accessible sink is not secured resulting in the piping being exposed. See Photo Shaw 12.	606	12.2.2 12.4	Remove all items under the sink. Reattach the sink guard	3	2	I	\$0
Unsecured Rugs Classrooms have rugs/carpets that are not fully secured and serve as a tripping hazard.	302.2	29.3	Remove or secure the rugs/carpets.	4	2	I	\$0
Cafetorium The tables in the cafetorium provide only 7" to 11" of knee depth. There are no railings on the stairs to the stage and no railings on the stairs from the Music Room to the Cafetorium. See Photos Shaw 13 and 14.	306.3	35.5	Modify one of the existing tables by removing one of the bench seats on one side of the table.	2	2	I	\$0
	505.2 505.3 505.4 505.10 505.7	27.3 27.4	Install continuous stair railings on the stairs to the stage (on opposite ends of stairs) and on the stairs to the Music Room (both sides of the stairs). Railings s/b between 34" – 38" a.f.f. to the top of the railing, circular or oval in x-section, 1¼" – 2" in outside diameter, and with extensions at the top (12" parallel to the floor) and bottom as feasible (slope distance one tread then 12" parallel to the floor).	2	3	I	Up to \$3,500+
Music Room The Music Room lockers for musical instruments have locking/operating mechanisms which require pinching and twisting of the wrist. The ramp to the Music Room from the hallway has segments of 5 to 8 feet with running slopes that vary from 8.4% to 8.6%.	309.4	39.5	Modify at least one of each of the 3 different sized instrument lockers such that operating mechanism can be used with a loose grip or closed fist.	2	2	I	Up to \$150
	405.2	24.2	As the cost to modify the ramp would be excessive and far exceed the benefit gained for a reduced running slope of 0.1% to 0.3%, seek a variance to retain the current ramp and running slope.	2	1	I	\$0

<p>The ramp railings to the Music Room from the hallway vary in height from 17½" a.f.f. to 17¾" a.f.f. (lower railing) and 33½" to 33¾" a.f.f. (upper railing), which is too low.</p> <p><i>Note: There are no tolerances for a range of dimensions or for running or cross slopes. The "tolerance" for the ramp railings is the allowed range of 34" to 38" a.f.f. (upper railing) and 18" to 20" a.f.f. (lower railing).</i></p> <p>See Photos Shaw 15 and 16.</p>	505.4	24.5	The ramp railings are attached to separate metal brackets that are affixed to the wall. The brackets are positioned in numerous locations along the ramp railings and secured by 2 screws at each bracket. The screws for the brackets to the railing should be slightly backed out and spacers inserted between the bracket and railing to make up the ¼" to ½" in height to bring the railings into compliance with the 18" to 20" a.f.f. and 34" to 38" a.f.f. height ranges.	2	2	I	\$100
<p>Adult Bathrooms</p> <p><u>Water Closet Clear Widths</u></p> <p>The water closet in the Level 2 Staff Bathroom (#225) is 18¾" o.c. to the near wall, which is ¾" too far.</p> <p><u>Toilet Paper Dispensers</u></p> <p>The toilet paper dispensers are 2" to 3" too far from the front of the water closet in the following bathrooms:</p> <ul style="list-style-type: none"> Bathrooms #121, 225, and 207. <p><u>Mirror Height</u></p> <p>The mirror in Bathroom #121 is 41½" a.f.f., which is 1½" too high. <i>Note: Mirrors that were 40¾" to 41" a.f.f. (Bathrooms # 100.1, 224, and 207) were considered to be within allowed industry standard tolerance.</i></p> <p><u>Coat Hooks</u></p> <p>The coat racks in the following bathrooms have coat hooks that are 15" to 15½" too high:</p> <ul style="list-style-type: none"> Bathrooms #100.1, 105, 121, 225, and 207. 	<p>604.2 604.3</p> <p>604.7</p> <p>603.3</p> <p>308</p>	<p>30.7.2</p> <p>30.7.6</p> <p>30.11</p> <p>6.5 6.6 30.6.1</p>	<p>As feasible, modify/relocate the water closet so it is 18" o.c. from the near wall. If not feasible, and due to the cost vs. the benefit for ¾" of setback, seek a variance.</p> <p>Relocate the toilet paper dispensers so they are a minimum of 7" and a maximum of 9" in front of the water closet measured to the centerline of the dispensers.</p> <p>Lower the mirror in Bathroom #121 so that it is no more than 40" a.f.f. to the bottom of the reflecting surface.</p> <p>Lower the coat hooks to no more than 48" a.f.f. under the 2010 ADA Standards.</p>	<p>3</p> <p>3</p> <p>3</p> <p>3</p>	<p>3, 1</p> <p>2</p> <p>2</p> <p>2</p>	<p>I</p> <p>I</p> <p>I</p> <p>I</p>	<p>\$0 to TBD</p> <p>\$0</p> <p>\$0</p> <p>\$0</p>
<p>Children Bathrooms</p> <p><u>Coat Hooks</u></p> <p>Coat hooks are 48" to 64" a.f.f., which are up to 28" too high in the bathrooms or stalls in the following bathrooms (as recommended in the highlighted Guidance on Reach Range above):</p> <ul style="list-style-type: none"> Nurse's bathroom and Bathrooms #105.1, 105.2, 121.1, 121.2, 145.1, 145.2, 225.1, 225.2, 207.1, 207.2 <p><u>Mirrors</u></p> <p>Mirrors in the following bathrooms are 1" to 2½" too high:</p> <ul style="list-style-type: none"> Nurse's bathroom and Bathrooms #105.1, 105.2, 121.1, 121.2, 118.1, 145.1, 145.2 	<p>308.1</p> <p>NA</p>	<p>30.20</p> <p>30.18</p>	<p>Lower the coat hooks so they are no more than 36" a.f.f.</p> <p>Lower the mirrors to a height of no more than 31" a.f.f. to the bottom of the reflecting surface.</p>	<p>3</p> <p>3</p>	<p>2</p> <p>2</p>	<p>I</p> <p>I</p>	<p>\$0</p> <p>\$0</p>

<p><u>Toilet Paper Dispensers</u></p> <p>Toilet paper dispensers are 1" to 2" too far from the front of the water closets in the following bathrooms:</p> <ul style="list-style-type: none"> Bathrooms #105.1, 105.2, 121.1, 121.2, 118.1, 145.1, 145.2, 225.1, 225.2, 207.1, 207.2 	604.9	30.14	The toilet paper dispensers s/b a minimum of 7" and a maximum of 9" in front of the water closet measured to the centerline of the dispenser and 17" to 19" a.f.f.	3	2	I	\$0
<p><u>Water Closets</u></p> <p>The water closet seat heights are ¼" to ½" too low in the following bathrooms:</p> <ul style="list-style-type: none"> Bathrooms #105.2, 118.1, 207.2. 	604.9	30.14	Provide a "padded or thicker" seat such that the height of the seats is 15" to 17" a.f.f.	3	2	I	Up to \$150
<p><u>Grab Bars</u></p> <p>The side and rear grab bars are up to ¼" to ½" too low in the following bathrooms:</p> <ul style="list-style-type: none"> Bathrooms 118.1, 225.1, 207.1 <p><i>Note: There are no tolerances for a range in dimensions.</i></p>	604.9	30.15	Raise the grab bars so they are 25" to 27" a.f.f. to the top of the gripping surface.	3	2	I	\$0
<p>The side grab bars are 5" to 6" too far from the interior corner in the following bathrooms:</p> <ul style="list-style-type: none"> Nurse's Bathroom and Bathrooms #105.1, 105.2, 121.1, 121.2, 225.2, 207.2 	604.5	30.15	Relocate the side grab bars so they are no more than 6" from the interior corner.	3	2	I	\$0
<p><u>Accessible Stalls</u></p> <p>The stall doors open in and not out in the following bathrooms:</p> <ul style="list-style-type: none"> Bathrooms #121.2, 225.2 	404.2 604.8.1	30.6.1	Modify the doors/hinges so that the doors open out and not in.	3	2	I	\$0
<p>The stall doors are not fully self-closing in the following bathrooms:</p> <ul style="list-style-type: none"> Bathrooms #121.2, 145.1, 145.2 	604.8	30.6.1	Modify/adjust the door hinges such that the doors fully self-close.	3	2	I	\$0
<p>The stall doors in the following bathrooms lack interior and/or exterior door pulls:</p> <ul style="list-style-type: none"> Bathrooms #105.2, 121.2, 121.2, 145.1, 145.2 	604.8	30.6.1	Install interior and exterior pull devices.	3	2	I	\$75
<p><u>Dispensers Height and Location</u></p> <p>The soap and towel dispenser's in the Nurse's Bathroom are 8½" too high and located over the grab bars.</p> <p>See Photos Shaw 17 and 18.</p>	308	30.19 30.20 30.8	Lower the dispensers to a height of no more than 36" a.f.f. and not over the grab bars.	3	2	I	\$0

TBD - Up to \$5,625

Raymond E. Shaw School Accessibility Assessment Photos



Photo Shaw 1



Photo Shaw 2



Photo Shaw 3



Photo Shaw 4



Photo Shaw 5

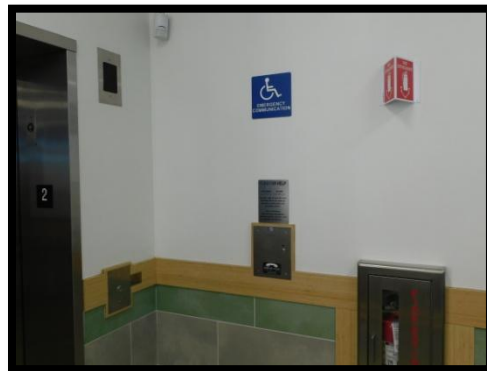


Photo Shaw 6

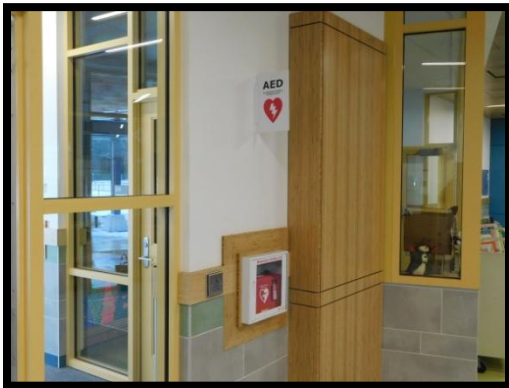


Photo Shaw 7



Photo Shaw 8

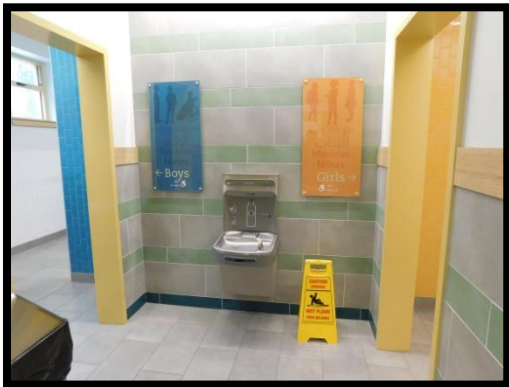


Photo Shaw 9



Photo Shaw 10



Photo Shaw 11



Photo Shaw 12

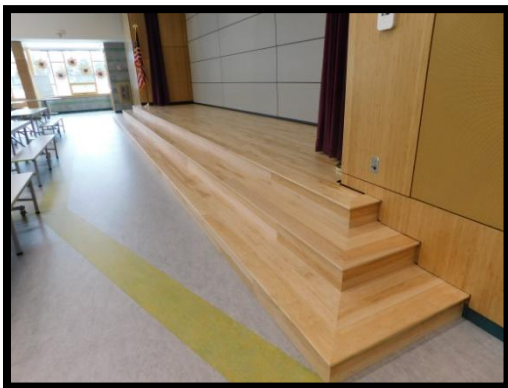


Photo Shaw 13



Photo Shaw 14



Photo Shaw 15



Photo Shaw 16



Photo Shaw 17



Photo Shaw 18

ELMWOOD STREET SCHOOL

Description of Facility: Elmwood Street School is a masonry 2-story building which serves as a public school for Pre-kindergarten to Grade 2. The roughly 72,200 s.f. building was originally constructed in 1968 and underwent a major renovation and rehabilitation in 2001.



Responsible Party: Board of Selectmen and School Committee.

2010 ADA Standards and 521 CMR Standards for Children: Both the 2010 ADA Standards and 521 CMR have advisories and/or varied standards for some items and elements for children according to age (2010 ADA Standards) or grade level (521 CMR). In some cases, there is limited room for interpretation but the guidance is in place as to what is applicable per different range of grade levels or age groups. ADA differentiates according to age level, with those being Ages 3 and 4, Ages 5 through 8, and Ages 9 through 12. 521 CMR differentiates according to grade level, with those being Pre-kindergarten, Kindergarten through 3rd Grade, and 4th Grade through 6th Grade. Grades 7 through 12 would follow the regular ADA or 521 CMR Standards as applied to adults. For the purposes of this assessment, the following standards were applied to the student and adult areas at the Elmwood School:

	<u>2010 ADA Standards</u>	<u>521 CMR Standards</u>
Student Common Areas/Hallway Bathrooms	Ages 5 - 8	Grades K – 3
Student Pre-K Bathrooms	Ages 3 - 4	Pre-Kindergarten
Adult Only Areas and Bathrooms	Adult	Adult

Bathroom Standards for Pre-K (Ages 3 – 4)

Toilet Centerline	11" to 12" o.c. to the near wall
Toilet Seat Height	11" to 12½" a.f.f. to the top of the seat
Toilet Paper Dispenser Height	14" a.f.f.
Urinal	15" a.f.f. (maximum) to the rim
Grab Bar Height	18" a.f.f. to 20" a.f.f. to the top of the gripping surface
Grab Bar Location	No greater than 6" from the interior corner
Sink Height	No greater than 30" a.f.f. to top
Sink Knee Clearance	At least 25" a.f.f.
Mirror Height	No greater than 31 a.f.f. to the bottom of the reflecting surface
Reach Range	No greater than 36" a.f.f. (see below)

Bathroom Standards for K - 3 (Ages 5 – 8)

Toilet Centerline	11" to 15" o.c. to the near wall
Toilet Seat Height	12" to 15" a.f.f. to the top of the seat
Toilet Paper Dispenser Height	14" to 17" a.f.f.
Urinal	15" a.f.f. (maximum) to the rim
Grab Bar Height	20" a.f.f. to 25" a.f.f. to the top of the gripping surface
Grab Bar Location	No greater than 6" from the interior corner
Sink Height	No greater than 30" a.f.f. to top
Sink Knee Clearance	At least 25" a.f.f.
Mirror Height	No greater than 31 a.f.f. to the bottom of the reflecting surface
Reach Range	No greater than 36" a.f.f. (see below)

Bathroom Reach Range Standards for Children

2010 ADA Standards

Section 308.1 of the 2010 ADA Standards provides guidance on reach ranges according to age in areas used primarily by children. The guidance for the reach range for Students Ages 3 through 4 is 20" (low minimum) to 36" (high maximum). The guidance for the reach range for Students Ages 5 through 8 is 18" (low minimum) to 40" (high maximum).

521 CMR

Section 30.19 of 521 CMR (Children's Dispensers) states that "towel dispensers, drying devices, or other types of devices and dispensers shall have at least one of each device mounted within the *zone of reach*, and at least one of each device shall be located within reach of a person using the accessible sink.

- Section 5.00 (Definitions) defines *zone of reach* as an "operable mechanism is within reach if it meets either criteria outlined in 521 CMR 6.5 (Forward Reach) or 521 CMR 6.6 (Side Reach)".
- Section 6.5 (Forward Reach) identifies the maximum high forward reach as 48" a.f.f. and minimum low forward reach as 15" a.f.f.
- Section 6.6 (Side Reach) identifies the maximum high side reach as 54" a.f.f. and minimum low forward reach as 9" a.f.f.

Section 30.20 of 521 CMR (Children's Controls and Receptacles) states that "if controls, receptacles, or

other equipment are provided, then at least one of each shall be mounted no higher than 36 inches above the floor to the centerline of the operable portion of the control”.

Section 30.6 of 521 CMR (Adult Toilet Stalls) requires that a coat hook be provided in accessible stalls at a maximum of 54” above the floor (30.6.1.d).

Section 30.12 of 521 CMR (Adult Dispensers) states that “towel dispensers, drying devices, or other types of devices and dispensers shall have at least one of each device mounted within the zone of reach” and as referenced in Figure 30i. Figure 30i identifies the reach range height for dispenser as 42” a.f.f. to the centerline of the operable portion of the dispenser.

Reach Range Variations

Based on the above, the reach range for bathroom dispensers varies up to **36” a.f.f.** for Pre-K Students and up to **40” a.f.f.** for Kindergarten Students under the ADA Standards but under 521 CMR is **42” a.f.f.** for adults. The reach range for dispensers for children’s bathrooms is **48” a.f.f. (forward reach) to 54” a.f.f. (side reach)** based on 521 CMR Sections 30.19, 5.0, 6.5, and 6.6. The reach range for controls and receptacles in children’s bathrooms is **36” a.f.f.** based on 521 CMR Sections 30.20

According to these conflicting standards, the reach range for a Pre-K and K Student’s dispensers could be mounted up to 8” higher under 521 CMR. This clearly does not appear to be the intent of either Standard as common sense would dictate that a children’s reach range should be lower than an adult’s reach range.

Recommendation

Considering the intent of the Standards and Regulations to have lower heights and ranges for children according to age or grade level, it is recommended that the dispenser heights and coat hooks in children’s bathrooms should follow Section 30.20 of 521 CMR which would result in heights of no more than 36” a.f.f. to the centerline of the operable portion of the dispenser or the coat hook.

General Description or Obstacle Which Limits Mobility or Access:

Parking

One of the 5 accessible parking spaces lacks signage and no space is designated as “van” accessible.

Main Entrance

An airphone buzzer is 7½” too high under the 2010 ADA Standards. A counter/shelf in the lobby at the front office widow is 3½” too high and also serves as a protruding object.

Common Areas and General

Interior and exterior doors with closers have operating forces and closing speeds which exceed that allowed. Some doors/rooms lack tactile designation signage, have signage that is improperly located, or signage that improperly identifies a room. Protruding objects (defibrillators, controls/alarms, protective cages for fire strobes and clocks in the gym) exist in the hallways and in common areas. Stairwells #2, #5, and #1 have stairs with railings that are 2” too low and lack bottom extensions. Two drinking fountains are “low” only, one which also provides only 24” of knee clearance.

Classrooms

Classrooms have unsecured rugs that serve as a tripping hazard. Classroom children sinks have bubblers that are too far from the outside edge, lack knee clearance, and have dispensers that are too high. Classroom adult sinks are too high and lack knee clearance. Wall mounted telephones are not within reach range. Classroom desks, cabinets, and other items were often placed in a manner to restrict the minimum required clear width of 36".

Typically the desks and tables in classrooms did meet knee clearance and table/desk top height requirements, but in those instances where they did not the tables/desks could be adjusted and raised as needed or adjustable/compliant desks could be brought into a classroom to address an accommodation for knee clearance and/or clear width.

Courtyard

The courtyard includes 5 benches, 3 adult picnic tables, 2 children picnic tables, play equipment, and a sandbox. None of these are on an accessible route of travel. There is no level area at any of the benches. The picnic tables lack knee depth. None of the items including the play equipment are on an accessible route of travel. There is an 8" abrupt change in level surface to access the sandbox.

Library

The apparent computer card catalogue located on top of the "actual" card catalogue is 12" too high and provides only 24" of knee clearance. The Fiction and Non-fiction stacks have only 30" to 32" of knee clearance.

Cafetorium

The dining tables lack compliant knee clearance and knee depth. The stairs to the stage have railings that are square in shape and not round or oval. The lift door to the stage has an excessive operating force, closes too fast, and lacks an interior pull device. Two wall-mounted telephones are 16" too high.

Teacher's Dining

The sink is 2½" too high and lacks knee clearance. In addition, the towel dispenser is 2½" too high.

Nurse's Office

The exam room sink has piping that is not wrapped and has a leg-operated sink valve that restricts the knee depth and clearance for all wheelchair users. The towel dispenser, soap dispenser, and cup holder are up to 4" too high.

Kindergarten and K – 2 Student Bathrooms

Light switches, mirrors, and coat hooks are too high. Some of the bathrooms also have dispensers that are too high. Toilet paper dispensers are too high and located too close to the front of the water closet. In some cases the dispensers were located over the grab bars. Some of the water closet rims are too high or too low. With limited exceptions, grab bars are too high and located too far from the interior corner. Some stall doors open in and not out, do not self-close, and lack interior or exterior pull devices. In 2 of the bathrooms the towel dispensers also serve as protruding objects.

Adult Bathrooms

Some of the light switches are too high and some of the towel dispensers are located over the grab bars. Toilet paper dispensers are located too close to the front of the water closet. Grab bars are too high with rear grab bars located too far from the interior corner. Stall doors lack interior pull devices and have coat hooks that are too high. Three of the bathrooms have dispensers or shelving that serves as a protruding object.

Kitchen

The kitchen area itself has numerous elements of non-compliance (dispenser reach range, sink knee clearance, sink knee height, sink knee depth, etc.). Tactile designation signage for the office and storage room is improperly located either on the door or on the hinge side of the door. The staff bathroom lacks tactile signage, has grab bars that are ½" too high with a rear grab that is located 1" too far from the interior corner, and sink faucets with self-closing valves that require more than 5 lbs. to operate and do not stay on for at least 10 seconds. Stairs from the kitchen to exit C1 have railings that lack top and bottom extensions. As these areas are closed to public and require personnel who must meet certain physical requirements to perform the essential functions of their position, unless dictated by a request for a reasonable accommodation, no further action is required at the present time.

Classroom Sinks and Classroom Sinks with Bubblers

Typically school classrooms have sinks and/or sinks with bubblers (a.k.a. drinking fountains) in the classroom to allow children to wash their hands or to get a drink of water without leaving the classroom.

2010 ADA Standards

The 2010 ADA Standards addresses this as follows:

- Drinking fountains shall comply with Sections 307 (protruding objects) and 602 (drinking fountains).
- Clear floor space must adhere to Section 305 (generally 30" wide and a forward approach) with knee and toe clearance adhering to Section 306 (generally 9" a.f.f. toe clearance and 27" a.f.f. knee clearance). Section 606.2 allows a knee clearance of a minimum of 24" a.f.f. at lavatories and sinks used primarily by children ages 6 through 12 where the rim or counter surface is 31" maximum a.f.f.

Exception: A parallel approach complying with Section 305 is permitted for children's use (5 years and younger per Section 606.2) where the spout is 30" maximum a.f.f. and is 3½" maximum from the front edge.

- The spout outlet cannot exceed 36 inches a.f.f. (Section 602.4) and cannot be more than 5" from the front edge (Section 602.5).
- The spout shall provide a flow of water 4 inches high minimum with the angle of the water stream measured horizontally to the front face of the unit. For spouts located less than 3 inches from the front edge, the angle shall be 30 degrees maximum. For spouts located between 3 and 5 inches from the front edge, the angle shall be 15 degrees maximum (Section 602.6).
- Controls shall comply with Operable Parts (Section 309.4) such that they are operable with one

hand and do not require tight grasping, pinching, or twisting of the wrist. The operating force cannot exceed 5 lbs.

521 Code of Massachusetts Regulations

The 521 Code of Massachusetts Regulations addresses this as follows:

- e) Section 12 specifically addresses sinks in classrooms under Section 12.4. Classroom countertops and sinks shall comply with 521 CMR 12.2.2 b, 12.2.2 c, and 12.2.2 d. These subsections require adherence to clear floor space (30" wide), knee clearance (30" wide, 27" high, 19" deep), and height (28" to 34" a.f.f.). In addition, Section 12.5 requires that drinking fountains in classrooms adhere to the requirements of Section 36.00 drinking fountains.
- f) Section 36.2 requires minimum clearances of 27" a.f.f. (knee), 30" (width), and 17" to 19" (depth). In addition, there must be a minimum of 30" wide clear width at the approach to the drinking fountain.
- g) Drinking fountain spouts must adhere to Section 36.3 which requires spouts to be located at the front of the unit with the water flow in a trajectory that is parallel or nearly parallel to the front of the unit. The spout shall provide a flow of water at least 4 inches high and the spout height be no more than 36" a.f.f. For a "square" bowl, the requirements are for the spout to be at the front of the bubbler (sink) and have a parallel water flow trajectory. A round or oval bowl should have the spout positioned such that the flow of water is within 3 inches from the front edge.
- h) Controls shall be operable with one hand and not require tight grasping, pinching, or twisting of the wrist. The operating force cannot exceed 5 lbs. (Section 36.5).

Assessment and Comment

As noted above, there are both similarities and differences between the 2010 ADA Standards and 521 CMR. Two of the larger variations are the exception allowed under the ADA Standards for a parallel approach to the sink/bubbler for children 5 years of age and younger and what would also appear to be a farther allowed spout setback from the front edge. As both 521 CMR and the 2010 ADA Standards apply, the stricter of the two standards must be adhered to.

Based on an assessment of the Elmwood Street School rooms and classrooms, it does not appear that the sink bubblers are in compliance. The sinks with bubblers lack knee clearance and the spout locations are roughly 6" to 8" from the outside edge with water flows apparently more than 3" from the outside edge, both which would exceed that allowed under the 2010 ADA Standards and 521 CMR. It should be noted that most, but not all, of the classroom sink bubblers were not in service at the time of assessment.

Elmwood Street School Accessibility Assessment

General Description of Obstacle	2010 ADAAG	MAAB 521 CMR	Type of Action to be Taken	P	F	TF	Cost Estimate
Parking One of the 5 accessible parking spaces lacks signage and no space is designated as "van" accessible. See Photo Elmwood 1.	502.6 208.2	23.6 23.2	Provide signage at the space without signage. The signage must be set such that the height is a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR). Provide "van accessible" signage at the 2 spaces that share the 8' wide access aisle.	1	2	I	\$75
Main Entrance An airphone buzzer is 7½" too high under the 2010 ADA Standards. A counter/shelf in the lobby at the front office widow is 3½" too high and also serves as a protruding object. See Photo Elmwood 2.	308.2 308.3 904.4 307.2	6.5 6.6 7.2 20.6.1	Lower the airphone buzzer to a height of no more than 48" a.f.f. to the operating mechanism. Lower the counter so that it is no more than 36" a.f.f., and 36" in length, with a minimum of 27" of knee clearance. If the adjacent cabinets do not remain in place, install wing walls for cane detection.	1 2	3 2	I I	Up to \$250 \$150
Exterior and Interior Doors Exterior and interior doors with closers (including bathrooms) do not fully comply with the maximum allowed operating force for an exterior door (15 lbs.), interior door (5 lbs.) and minimum closing speed requirement of 6 seconds under 521 CMR.	404.2.8 404.2.9	26.8 26.9	Adjust door closers such that the push/pull force does not exceed 15 lbs for an exterior door and 5 lbs. for an interior door with door closing speeds of at least 6 seconds.	1, 3	2	I	\$0
Door Signage Tactile designation signage is not provided at the following locations: <u>Level 1</u> <ul style="list-style-type: none"> Egress doors B115 B208, B10, 104, 102, closet Nutrition Services Storage between M/W bathrooms near library Door to Assistant Principal from hallway Door to Nurse from hallway Front Office staff bathroom Front Office storage room Office next to Nurse from Nurse's Office Nurse's Office bathroom Nurse's Office to hallway Door to Kitchen from Cafetorium Gym Office near entrance ("Miss Kim's Room") Classroom closets Door to Stairwells Level 2 Room #6301 Level 2 Room #6630 Level 2 #6630 door to office 	703	41.1	Install, replace, and/or relocate accessible compliant designation signage on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Under 521 CMR, signage s/b 60" a.f.f. to the centerline of the sign. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	2, 3	2	I	Up to \$1,200

<ul style="list-style-type: none"> Level 2 Storage by Stair #1 Level 2 Room by Men's bathroom across from Teacher's Dining <p>The following have signage on the door and not on the latch side:</p> <ul style="list-style-type: none"> Front Office Assistant Principal Office next to Nurse from Front Office Nurse's Office Exam Room Level 2 Reading Room not on latch side Level 2 Women's by Stair #5 <p>The following have signage that is improperly labeled:</p> <ul style="list-style-type: none"> Level 2 "Reading Room" is the "IT" Room Level 2 "Storage Room" is "Speech Testing" <p>The following have signage that is too low:</p> <ul style="list-style-type: none"> Level 2 Boy's near #220 (56½" a.f.f.) Level 2 Girl's near #220 (56½" a.f.f.) Level 2 Men's near Stair #1 (56½" a.f.f.) Level 2 Women's near Stair #1 (56½" a.f.f.) <p>See Photos Elmwood 3 and 4.</p>							
<p>Protruding Objects</p> <ul style="list-style-type: none"> Level 1 defibrillator by Gym (9" protrusion at 39" a.f.f.) Level 1 defibrillator by Nurse's Office (7" protrusion at 40½" a.f.f.) Controls and alarms in Front Office (4¾" to 5" protrusion at 56" to 69½" a.f.f.) Gym fire alarm strobe cages (4 at 6¾" protrusion at 73" a.f.f.) Gym clock cages (2 at 5¼" out at 75¼" a.f.f.) <p>Protruding objects extend more than 4" into the accessible route of travel between a height of 27" and 80" a.f.f. or have vertical headroom clearance reduced to less than 80".</p> <p>See Photos Elmwood 5 and 6.</p>	307.2	20.6.1	<p>As feasible, relocate the defibrillators so they are not on an accessible route of travel. If not feasible, place fixed objects below or erect wing walls on the sides.</p> <p>Place fixed objects under the controls and alarms in the office.</p> <p>Replace the gym cages with ones that do not protrude more than 4" from the wall.</p>	2	2	1	\$0 to \$350

Stairs and Railings Stairs #1, #2, and #5 The railings are 2" too low and lack bottom extensions. See Photo Elmwood 7.	505.4 505.10	27.4.2 27.4.3	Raise the existing railings so they are between 34" – 38" a.f.f. to the top of the railing and modify so they have extensions at the bottom (the slope distance of one tread then 12" parallel to the ground).	4	3	N	Up to \$5,000+
Drinking Fountains <ul style="list-style-type: none"> Level 1 by Boy's/Girl's Bathrooms – "low" only with 24" of knee clearance Level 1 in Gym – "low" only with 27" of knee clearance 	211	36	Option #1: Both of the drinking fountains are currently not in service. The fountains should continue to be placed out of service. Option #2 – Add a "high" drinking fountain per each location and raise the existing gym fountain so that it has a minimum of 27" of knee clearance. The drinking fountains must comply as follows: Protruding objects compliance of no > 4" protrusion between 27" and 80" a.f.f. (307); 30"x48" clear space requirement (305), and knee/toe clearance (306). Knee clearance is 9" to 27" a.f.f.; 25" deep max. at 9" a.f.f. or 11" deep min at 9" a.f.f. and 8" deep min at 27" a.f.f. Width of knee clearance s/b 30" wide min (306.3). Toe clearance as part of c.f.s. 17" min – 25" max, 9" high a.f.f., 30" wide (306.2). The spout s/b 15" min from wall and 5" max from the front edge of the unit (602.5). Flow of water 4" high min and spout located max 5" from front (602.6). and with the water flow within 3" from the front edge (36.3). The spout height s/b 36" max. a.f.f. for "low" and 38" min a.f.f. to 43" max a.f.f. for "high". The controls s/b operable w/one fist; no > 5 lbs force (309.4).	2	3	N	Up to \$7,500+
Court Yard None of the 5 benches are on an accessible route of travel and lack a level area for a wheelchair. None of the 3 adult picnic tables and 2 child picnic tables are on an accessible route of travel. The tables lack knee clearance and knee depth. The play equipment is not on an accessible route of travel. There is an 8" abrupt change in level surface to access the playground.	403 221 902.3 306.2 306.3	22 14.4 19.6 19.5.2	An accessible route of travel needs to be provided to all areas available to the public. The accessible route of travel must be compliant with width (48" per 521 CMR) and slope (2% max. cross, 5% max. running) requirements as well as changes in level surface (no > than ¼" unbeveled or between ¼" and ½" beveled w/a slope of no > 1:2). Construction options include compacted stone dust, asphalt or similar surfaces that meet the requirement of stable, firm, and slip resistant. Costs will vary depending on material used. Provide an accessible route of travel to one of the benches and create an approach and level wheelchair area next to benches. The space should be 36" wide x 60" deep per wheelchair. If a front/rear approach, the depth can be reduced to 48" as opposed to 60" for a side approach. Provide an accessible picnic table on-site with the accessible portion overlapping the existing asphalt. The accessible picnic table must have a minimum of 30" clear width, 27" knee height, and 19" knee depth.	2	2	N	Up to \$2,500
Library The stack clear width in the Fiction/Non-Fiction area is reduced to 30" to 32", which is 4" to 6" too narrow. The apparent computer card catalogue located on top of the "actual" card catalogue is 12" too high and provides only 24" of knee clearance.	403.5 226 306.3	12.2 20.3 12.2.5	Re-arrange the stacks to achieve the required minimum 36" clear width. Relocate the computer card catalogue to a desk or table that provides a minimum of 27" knee clearance, 30" clear width, and 19" knee depth. The height of the table top should not exceed 34".	2 2	2 2	I I	\$0 \$0

See Photos Elmwood 8 and 9.

Cafetorium The dining tables (24) lack the minimum required knee clearance and knee depth. The stairs to the stage have railings that are square in shape and not round or oval. The lift door to the stage has an excessive operating force (8 lbs.), closes too fast (3 seconds), and lacks an interior pull device. Two wall-mounted telephones are 64" a.f.f., which are 16" too high. See Photos Elmwood 10 and 11.	902	35	A minimum of 5% of the tables s/b accessible. Provide at least one table that has a minimum knee clearance of 27" a.f.f., a minimum knee depth of 19", and a minimum clear width of 30".	2	2	I	\$250
	505.7	27.4	On the interior of the existing railings, install metal railings that are between 34" – 38" a.f.f. to the top of the railing, circular or oval in x-section, 1½" – 2" in outside diameter, and with extensions at the top (12" parallel to the ground) and bottom (slope distance one tread then 12" parallel to the ground).	2	3	I	Up to \$2,500+
	309.4 404.2.7 404.2.8 404.2.9 410.6	39 26.8 26.9 26.11 28.12	Modify the lift door so that it takes no more than 5 lbs. to operate and takes at least 6 seconds to close. Install an interior pull device to ensure that the door can be fully closed from the interior using a closed fist or loose grip.	2	2,3	I	Up to \$200
	308	6.5 6.5	Lower at least one of the telephones so that it is no more than 48" a.f.f. to the operating mechanisms.	2	2,3	I	\$100
Adult Sinks and Dispensers <u>Teacher's Dining</u> The sink is 2½" too high and lacks knee clearance. In addition, the towel dispenser is 2½" too high. <u>Nurse's Office</u> The exam room sink has piping that is not wrapped and has a leg-operated sink valve that restricts the knee depth and clearance for all wheelchair users. The towel dispenser, soap dispenser, and cup holder are up to 4" too high. <u>Front Office Work Room</u> The sink is 2" too high and lacks knee clearance. The microwave is 13" too high at the operating mechanisms. The towel dispenser is 10" too high. See Photo Elmwood 12.	804.3.2 306.3 308	32.2 32.6 32.7 6.5 6.6	Modify the counter and sink so that the counter/sink is no more than 34" a.f.f. and there is a minimum of 27" knee clearance at the sink with guarded, wrapped, or insulated piping. Lower the towel dispenser to a height of no more than 48" a.f.f.	2	3	N	Up to \$2,500
	606.5 306.2 306.3 308	32.7.4 6.5 6.6	Modify the sink and remove any impediments that restrict knee and toe depth. Wrap, guard, or insulate the piping. Lower the towel dispensers to a height of no more than 48" a.f.f.	2	3	N	Up to \$350
	804.3.2 306.3 308	32.2 32.6 32.7 6.5 6.6	Modify the counter and sink so that the counter/sink is no more than 34" a.f.f. and there is a minimum of 27" knee clearance at the sink with guarded, wrapped, or insulated piping. Lower the towel dispenser to a height of no more than 48" a.f.f. and provide a microwave on a counter.	2	2	N	Up to \$2,650
	302.2	29.3	Remove or secure the rugs/carpets.	4	2	I	\$0
	308	6.5 6.6	As may be required due to a teacher reasonable accommodation request, lower phones to a height of no more than 48" a.f.f. to the operating mechanisms.	2	3	L	TBD
	403.5	20.3	Rearrange furniture and items as required to achieve a minimum of 36" clear width. <i>Note: Under the 2010 ADA Standards, a reduction to 32" is allowed for a distance of no greater than 24".</i>	2	2	I	\$0
Rooms and Classrooms Classrooms have unsecured rugs that serve as a tripping hazard. Wall mounted telephones are not within reach range. Classroom desks, cabinets, and other items were often placed in a manner to restrict the minimum required clear width of 36". Furniture in the front office reduces the clear width to only 21". The clear width in the Nurse's Office is reduced to 26" due to chairs.							

<p><u>Classroom Sinks and Bubblers</u> Classroom children sinks have bubblers that are too far from the outside edge, lack knee clearance, and have dispensers that are too high. Sink bubblers varied in height from 28" a.f.f. to 35" a.f.f. with front counter setbacks of 5" to 8". Dispenser heights varied from 36" to 42" and over 18" counters. The following classrooms have sinks, bubblers, and dispensers:</p> <p>Level 1. Classrooms #114 126 115, 125, B116, B124, B117, B122, B118, B119, B121, B110, B108, B107, B105, B104, B102, B220, B219, B218, B217, B216, B215, B226, B225, B224, B222, B223, B221, B201, B203, B204, B208, B209, B211</p> <p>Level 2. Classrooms B#220, 219, 218,217, 216, 215, 226, 225,224, 222, 223, 221, 201, 203,204, 208</p> <p><u>Classroom Adult Sinks</u> Classroom adult sinks are 2" too high at 36" a.f.f. and lack knee clearance in the following classrooms:</p> <p>Level 1. Classrooms #110, #108, #107, #105, #104, #209. #211.</p> <p>Level 2. Classroom #208.</p> <p>See Photos Elmwood 13 and 14.</p>	602.5 602.6 306.3 306.2	36.3 36.2	At the time of assessment, nearly all of the sink bubblers were not in service.				
			Option 1: Place all of the classroom sink bubblers "out of service". Lower the dispensers to a height of no more than 40" a.f.f. and not over a counter. As required as a result of a reasonable accommodation request, modify the sinks to provide a minimum of 25" of knee clearance with wrapped, guarded, or insulated piping.	2	3	I	TBD
			Option 2: Modify the bubblers so that they are no more than 5" from the front edge and project a flow of water within 3" from the front edge. Lower the dispensers to a height of no more than 40" a.f.f. and not over a counter. Modify the sinks to provide a minimum of 27" of knee clearance with wrapped, guarded, or insulated piping. If 27" cannot be accommodated, then a variance for a minimum of 25" of knee clearance would be required.	2	3	N,L	TBD
	804.3.2 306.3	32.2 32.6 32.7	As a result of a reasonable accommodation request, modify the counters and sinks so that the counters/sinks are no more than 34" a.f.f. and there is a minimum of 27" knee clearance at the sinks with guarded, wrapped, or insulated piping.	2	3	N,L	TBD
Pre-K Classroom Bathrooms							
The 3 Pre-K shared classroom bathrooms (#108/110, #105/107, #102/104) have a number of areas of non-compliance. <u>BR's #108/110, 105/107, 102/104</u> The light switches are 50" a.f.f., which are 14" too high.	308	30.19 30.20	Although the light switches are 14" too high for children, it is presumed that Pre-K students will be accompanied by an adult in the bathroom who will control the light switches. Therefore, no further action is required.	3	-	-	\$0
The mirrors are up to ½" too high.	NA	30.18	As it is not possible to lower the mirrors over the sinks, provide additional mirrors at a height of no more than 31" a.f.f.	3	2	I	\$75
The water closets 4" to 5" too far from the near wall.	604.9	30.14	Relocate the water closets so they are 11" to 12" o.c. from the near wall	3	3	N	\$0
The toilet paper dispensers are 7" too close to the front of the water closet, up to 32" too high, and located over the grab bars.	604.9 604.7	30.14 30.8.5	Relocate the toilet paper dispensers so they 7" to 9" in front of the water closet, 14" a.f.f. o.c., and not located over the grab bars.	3	2	I	\$0
The side and rear grab bars are ¼" to 5¼" too high.	604.9	30.15	Lower the grab bars to a height of 18" to 20" a.f.f. to the top of the gripping surface.	3	2	I	\$0
There are no interior stall door pull devices.	604.8	30.6.1	Install interior stall door pull devices at a height of no more than 36" a.f.f.	3	2	I	\$30

The coat hooks are 14" too high.	308	30.19 30.20	Lower the coat hooks to a height of no more than 36" a.f.f.		2	I	\$0
<u>BR's #108/110 Only</u>							
The soap dispenser is 4" too high.	308	30.19 30.20	Lower the soap dispenser to a height of no more than 36" a.f.f.	3	2	I	\$0
				3	2	I	\$0
There is only 20" of clearance on the far side of the water closet due to an exam table.	604.3	30.14 30.7.2	Remove the exam table.				
See Photos Elmwood 15 and 16.							
Student K-3 Bathrooms							
These are presumed to be the Nurse's Bathroom, L1 Girl's near Café, L1 Boy's near Café, L2 Boy's near #220, L2 Girl's near #220, L2 Boy's near Stair 5, L2 Girl's near Stair 5, B208, B209-211.							
<u>Light Switches</u>							
The light switches are up to 51" a.f.f., which are 15" too high in the following bathrooms:	308	30.19 30.20	Rather than lower the switches, convert the switches to motion activated.	3	3	I	Up to \$2,000
<ul style="list-style-type: none"> Nurse's Bathroom, L1 Girl's near Café, L1 Boy's near Café, L2 Boy's near #220, L2 Girl's near #220, L2 Boy's near Stair 5, L2 Girl's near Stair 5, B208, B209-211. 							
<u>Mirrors</u>							
The mirrors are up to 6½" too high in the following bathrooms:	NA	30.18	Lower the mirrors so they are no higher than 31" a.f.f. to the bottom of the reflecting surface. If lowering is not feasible, provide an additional mirror at a height of no more than 31" a.f.f. to the bottom of the reflecting surface. <i>Note: There are no exceptions for "tilting" mirrors.</i>	3	2	I	Up to \$250
<ul style="list-style-type: none"> Nurse's Bathroom, L1 Girl's near Café, L1 Boy's near Café, L2 Boy's near #220, L2 Girl's near #220, L2 Boy's near Stair 5, L2 Girl's near Stair 5, B208, B209-211. 							
<u>Soap and Towel Dispensers</u>							
The soap dispensers are 2" to 4" too high in the L1 Girl's near Café, L1 Boy's near Café, and L2 Girl's near Stair 5 Bathrooms:	308	30.19 30.20	Lower the dispensers to a height of no more than 36" a.f.f.	3	2	I	\$0
The towel dispenser is 4" too high in the Nurse's Bathroom.							
<u>Water Closets</u>							
The Nurse's Bathroom water closet is 3" too far from the near wall.	604.9	30.14	Relocate the water closet so it is 11" to 15" o.c. from the near wall.	3	3	N	Up to \$3,500+
The L1 Boy's Bathroom near the Cafetorium water closet is ¾" too high and the B208 and B209-211 Bathrooms water closets are ¼" to ½" too low.	604.9	30.14	Replace the existing seats with thinner or thicker (padded) seats such that the water closets are 12" to 15" a.f.f. to the top of the seat.	3	2	I	\$150
<u>Toilet Paper Dispensers</u>							
Toilet paper dispensers are 2" to 7" too close to the front of the water	604.9 604.7	30.14 30.8.5	Relocate the toilet paper dispensers so they 7" to 9" in front of the water closet, 14" to 17" a.f.f. o.c., and not	3	2	I	\$0

<p>closets in the following bathrooms:</p> <ul style="list-style-type: none"> Nurse's Bathroom, L1 Girl's near Café, L1 Boy's near Café, L2 Boy's near #220, L2 Girl's near #220, L2 Boy's near Stair 5, B208, B209-211. <p>Toilet paper dispensers are 2" to 18" too high in the following bathrooms:</p> <ul style="list-style-type: none"> Nurse's Bathroom, L1 Girl's near Café, L1 Boy's near Café, L2 Boy's near #220, L2 Girl's near #220, B208, B209-211. <p>In addition, the B208, B209-211 dispensers are located over the grab bars.</p>			located over the grab bars.				
<p><u>Grab Bars</u></p> <p>The side and rear grab bars are ½" to 12¼" too high in the following bathrooms:</p> <ul style="list-style-type: none"> Nurse's Bathroom, L1 Girl's near Café, L1 Boy's near Café, L2 Boy's near #220, L2 Girl's near #220, L2 Boy's near Stair 5, L2 Girl's near Stair 5. <p>The side grab bars are 1" too far from the interior corner in the following bathrooms:</p> <ul style="list-style-type: none"> Nurse's Bathroom, L1 Girl's near Café, L2 Boy's near #220, L2 Girl's near #220. <p>The rear grab bars are 1" too far from the interior corner in the following bathrooms:</p> <ul style="list-style-type: none"> Nurse's Bathroom, L1 Girl's near Café, L1 Boy's near Café, L2 Boy's near #220, L2 Girl's near #220. 	604.9 604.5	30.15	Lower the grab bars so they are 20" to 25" a.f.f. to the top of the gripping surface. Relocate the side and rear grab bars so they are no more than 6" from the interior corner.	3	2	I	\$0
<p><u>Stall Doors</u></p> <p>Stall doors are not self-closing in the following bathrooms:</p> <ul style="list-style-type: none"> L1 Boy's near Café, L2 Boy's near #220, L2 Girl's near #220, L2 Boy's near Stair 5, L2 Girl's near Stair 5. 	604.8.1	30.6.1	Adjust the stall doors so they fully self-close.	3	2	I	\$0
<p>Stall doors open in and not out in the following bathrooms:</p> <ul style="list-style-type: none"> L1 Girl's near Café, L2 Girl's near #220, B208. 	404.2	30.6.1	Reverse the stall doors so they open out and not in.	3	2	I	\$0
<p>The following stall doors lack exterior pull devices:</p> <ul style="list-style-type: none"> L1 Girl's and L1 Boy's near Café, L2 Boy's and L2 Girl's near #220. 	604.8.1	30.6.1	Install exterior pull devices on the stall doors.	3	2	I	\$60

<p>The following stall doors lack interior pull devices:</p> <ul style="list-style-type: none"> L2 Boy's near Stair 5, L2 Girl's near Stair 5, B208, B209-211. 	604.8.1	30.6.1	Install exterior pull devices on the stall doors.	3	2	I	\$60
<p>The following bathrooms have coat hooks that are up to 16" too high:</p> <ul style="list-style-type: none"> L1 Girl's near Café, L1 Boy's near Café, L2 Boy's near #220, L2 Girl's near #220, L2 Boy's near Stair 5, L2 Girl's near Stair 5, B208, B209-211. 	308	30.19 30.20	Lower the coat hooks to a height of no more than 36" a.f.f.	3	2	I	\$0
<p>The L1 Girl's Bathroom by the Café lacks a locking mechanism.</p>	604.8 404.2	30.6	Install a locking mechanism on the stall door that can be operable with a closed fist or loose grip.	3	2	I	\$20
<p><u>Protruding Objects</u></p> <p>The following are protruding objects:</p> <ul style="list-style-type: none"> L1 Girl's Bathroom near the Café towel dispenser is 36" a.f.f. with a 7" protrusion L2 Girl's Bathroom near Stair 5 towel dispenser is 36" a.f.f. with a 7" protrusion <p><i>Protruding objects extend more than 4" into the accessible route of travel between a height of 27" and 80" a.f.f. or have vertical headroom clearance reduced to less than 80".</i></p> <p>See Photos Elmwood 17 and 18.</p>	307.2	20.6.1	Relocate the dispensers or placed a fixed object below the dispensers.	3	2	I	\$0
Adult Bathrooms							
<p><u>Coat Hooks</u></p> <p>Coat hooks are 50" to 51" a.f.f., which are up to 3" too high under the 2010 ADA Standards in the following bathrooms:</p> <ul style="list-style-type: none"> L1 Men's near Library, L1 Women's near Library, L1 Men's near Gym, L1 Women's near Gym, L2 Women's near Stair 5, L2 Men's near Stair 5, Front Office. 	308	30.6.1	Lower the coat hooks to a height of no more than 48" a.f.f.	3	2	I	\$0
<p><u>Soap and Towel Dispensers</u></p> <p>The Front Office soap dispenser is 2" too high. The Front Office towel dispenser is 6" too high.</p>	308	30.12	The lower the dispensers to a height of no more than 42" a.f.f. to the operating mechanism and not located over the grab bars.	3	2	I	\$0
<p>The Front Office Bathroom, L2 Women's Bathroom near Stair 1, and L2 Men's Bathroom near Stair 1 towel dispensers are located over the grab bars.</p>	308	30.12					
<p><u>Sink Faucets</u></p> <p>The sink faucets with self-closing</p>	309 606.4	30.9.6	Adjust the self-closing valves such that it takes no more than 5 lbs. to operate and the faucets stay open for at	3	2	I	\$0

valves in the Front Office Bathroom require more than 5 lbs. to operate and do not stay open for at least 10 seconds.			least 10 seconds.				
<u>Water Closets</u> The water closet front clearances in the L2 Women's Bathroom near Stair 1 and the Front Office Bathroom have only 24" to 30" of clear width due to a desk placed in front of the toilets.	604.3	30.7.2	Remove the desks.	3	2	I	\$0
The height of the water closet in the Front Office Bathroom is ½" too low.	604.4	30.7.3	Replace the seat with a thicker one such that the top is between 17" to 19" a.f.f.	3	2	I	\$75
<u>Toilet Paper Dispensers</u> Toilet paper dispensers are 2" to 5" too close to the front of the water closets in the following bathrooms: <ul style="list-style-type: none"> L1 Men's near Library, L1 Women's near Library, L2 Women's near Stair 1, L2 Women's near Stair 5, L2 Men's near Stair 5. 	604.7	30.7.6	Relocate the toilet paper dispensers so they are 7" to 9" o.c. to the front of the water closets.	3	2	I	\$0
<u>Grab Bars</u> The side and rear grab bars are ¼" to 1" too high in the following bathrooms: <ul style="list-style-type: none"> L1 Women's near Library, L1 Men's near Gym, L1 Women's near Gym (side only), L2 Women's near Stair 1, L2 Men's near Stair 5, L2 Women's near Stair 5. 	609.4	30.8.2	Lower the grab bars so they are 33" to 36" a.f.f. to the top of the gripping surface. <i>Note: There are no tolerances for a range of dimensions.</i>	3	2	I	\$0
The rear grab bars are 1" too far from the interior corner in the following bathrooms: <ul style="list-style-type: none"> L1 Men's near Library, L1 Women's near Library, L1 Women's near Gym (side only), L2 Women's near Stair 1. 	604 609	30.8.1	Relocate the grab bars so they are no more than 6" from the interior corner.	3	2	I	\$0
<u>Accessible Stalls</u> The stall door in the L1 Women's Bathroom near the Gym is not fully self-closing.	604.8.1	30.6.1	Modify the stall door hinges so the door fully self-closes.	3	2	I	\$0
The stall doors in the following bathrooms lack interior door pulls: <ul style="list-style-type: none"> L1 Men's near Library, L1 Women's near Library, L1 Men's near Gym, L1 Women's near Gym, L2 Women's near Stair 5, L2 Men's near Stair 5. 	604.8.1	30.6.1	Install interior pull devices.	3	2	I	\$90
<u>Protruding Objects</u> The following are protruding objects: <ul style="list-style-type: none"> L1 Men's Bathroom near the Library has a shelf that is 38" a.f.f. with a 6" protrusion. 	307.2	20.6.1	Install wing walls on the ends of the shelf. Remove the sanitary napkin dispensers.	3	2	I	\$50

<ul style="list-style-type: none"> L1 Women's Bathroom near the Gym has a sanitary napkin dispenser that is 30 1/4" a.f.f. with a 7" protrusion. L2 Women's Bathroom near Stair 5 has a sanitary napkin dispenser that is 31" a.f.f. with a 7" protrusion. <p><i>Protruding objects extend more than 4" into the accessible route of travel between a height of 27" and 80" a.f.f. or have vertical headroom clearance reduced to less than 80".</i></p> <p>See Photos Elmwood 19 and 20.</p>							
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TBD - Up to \$31,935+

Elmwood Street School Accessibility Assessment Photos



Photo Elmwood 1



Photo Elmwood 2



Photo Elmwood 3

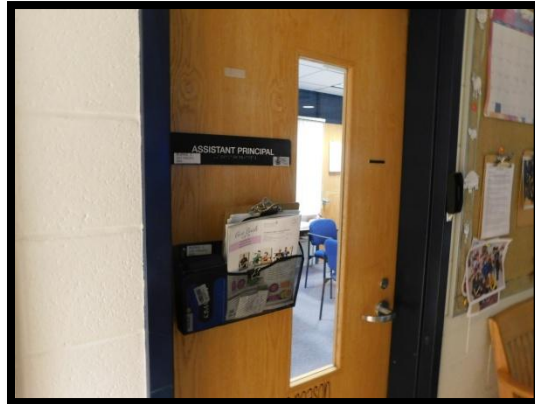


Photo Elmwood 4

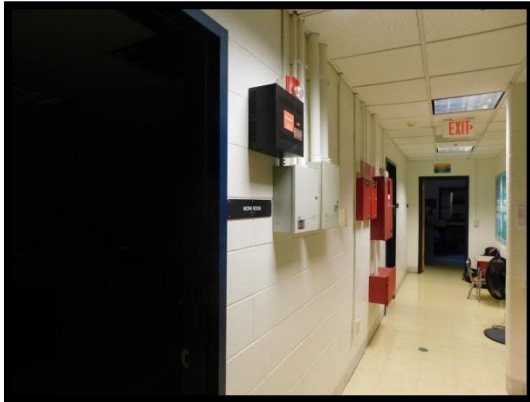


Photo Elmwood 5

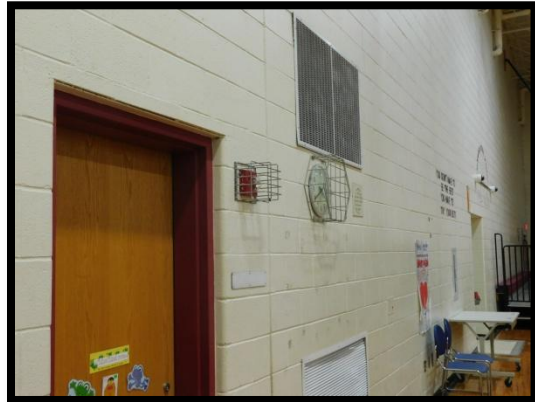


Photo Elmwood 6

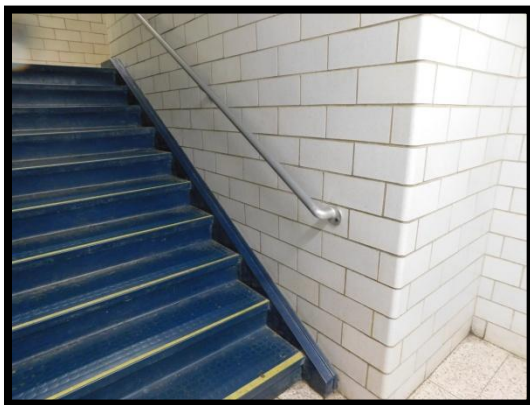


Photo Elmwood 7



Photo Elmwood 8



Photo Elmwood 9

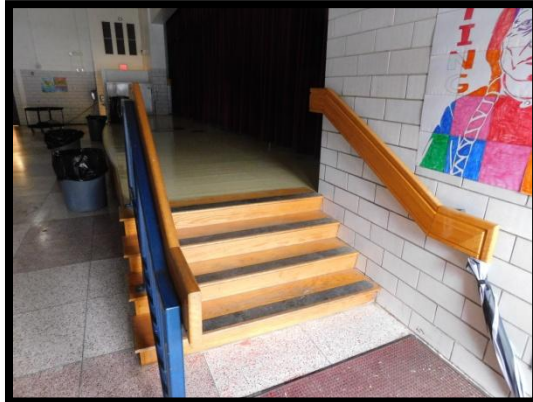


Photo Elmwood 10

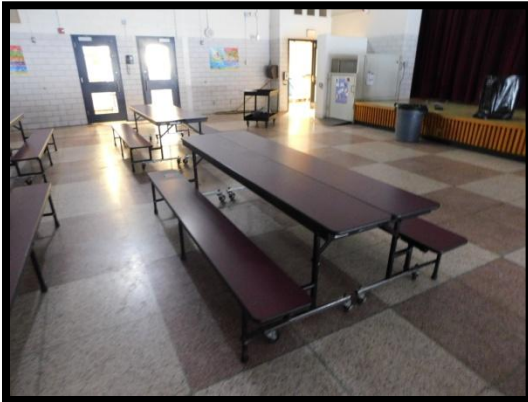


Photo Elmwood 11



Photo Elmwood 12



Photo Elmwood 13



Photo Elmwood 14



Photo Elmwood 15

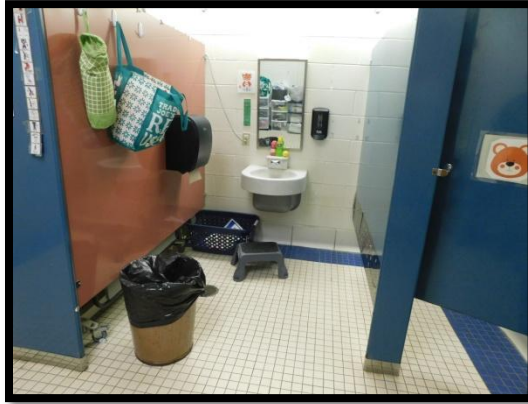


Photo Elmwood 16

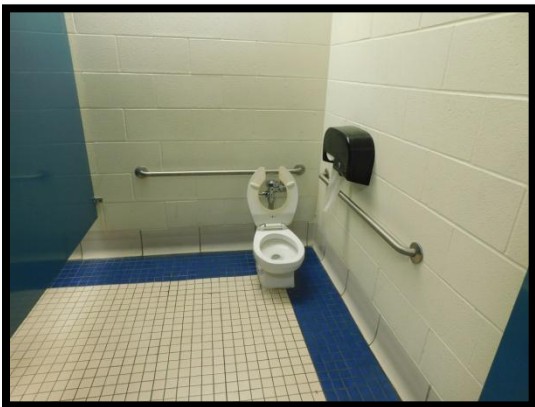


Photo Elmwood 17

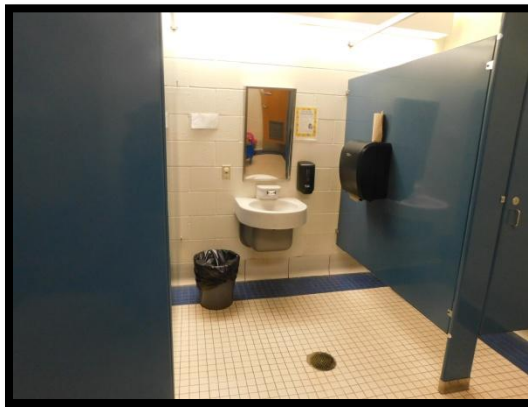


Photo Elmwood 18

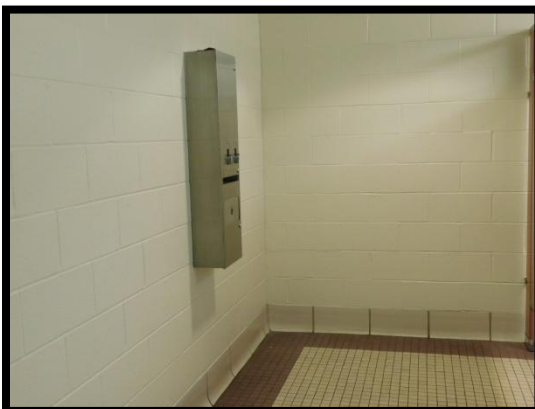


Photo Elmwood 19



Photo Elmwood 20

MILLBURY MEMORIAL JUNIOR - SENIOR HIGH SCHOOL

Description of Facility: Millbury Memorial Junior/Senior High School is a 2-story masonry structure housing approximately 750 students from grades 7 - 12. The High School totals approximately 128,000 s.f. and the Junior High School totals approximately 36,000 s.f. The school was built circa 1950 and underwent a major renovation in 2002.



Responsible Party: Board of Selectmen and School Committee.

2010 ADA Standards and 521 CMR Standards for Children: ADA differentiates according to age level whereas 521 CMR differentiates according to grade level. In both cases, adult standards apply to all areas of the Millbury Junior/Senior High School.

General Description or Obstacle Which Limits Mobility or Access:

Designated Accessible Parking

The 3 accessible parking spaces and access aisles near the High School front entrance have running slopes that vary from 2.6% to 3.0%. Signage for the spaces is 6" to 9" too low.

The 3 accessible parking spaces and access aisles at the C1 High School entrance has one space which lacks signage with the other 2 spaces having signage that is 1" to 4" too low.

The single accessible parking space near the B6/B5 High School egress lacks striping and has signage that is 10¼" too low.

The 2 accessible parking spaces for the Junior High School have running slopes that vary from 2.2% to 3.4% and lack signage. In addition, the spaces are located too far from the Junior High School entrance.

Accessible Routes of Travel

There is no accessible route of travel from the front Junior High School parking to the Junior High School entrance as the only route of travel is by using the driveway and traversing over speed humps.

The painted crosswalk from the High School Egress B3 to the Junior High School Entrance A1 ends in a 5" abrupt change in level surface on the Junior High School side. In addition, there is no designated or painted route of travel to the ramp and no detectable warnings with truncated domes.

The asphalt walkway to the Junior High School entrance has a running slope of up to 10.0%+ for the roughly 6 feet before the landing and has a 1"+ abrupt change in level surface in the transition from asphalt to concrete at the top of the walkway.

Exterior Stairs and Railings

The stairs at the High School front parking have railings which lack top and bottom extensions.

The High School B1 Egress from the cafeteria has 2 steps which lack railings.

The High School A2 Egress lacks stair railing extensions on the right side of the stairs (facing the building).

The High School Main Entrance has stairs with railings that lack top extensions.

The Junior High School B1 Egress stairs lack railings.

The steps at the Junior High School A1 entrance from the High School B3 egress has 3 steps with no railings.

Exterior Ramps and Railings

The ramp to the High School C1 entrance has a railing on one side only. In addition, the existing railing does not extend beyond the base of the ramp.

The concrete ramp to the Junior High School entrance has running slopes that vary from 9.0% to 12.4%, has areas of deterioration, and segments of the lower railing (left side) that are up to 2" too high for approximately 6+ feet.

Airphone Buzzers

The High School Main Entrance and C1 Entrance airphone buzzers (2) are 59" a.f.f., which are 11" too high under the 2010 ADA Standards. The Junior High School Entrance airphone buzzer is 49½" a.f.f.

High School and Junior High School Common Areas and General

Interior and exterior doors with closers have operating forces and closing speeds which exceed that allowed. Rooms lack tactile designation signage or have signage that is improperly located, improperly labeled, or blocked/covered. Some common areas, offices, and classrooms have dispensers, coat hooks, drop boxes, pencil sharpeners, telephones, and other items that are not within reach range. Some items such as wall mounted fire strobes, protective cages over fire strobes shelving, defibrillators, etc. also serve as protruding objects. Some classrooms and rooms have loose or unsecured rugs. The Nurse's Office as well as other rooms and classrooms have clear widths of less than 36" due to fixed items such as chairs, desks, and carts.

Typically the desks and tables in regular classrooms did meet knee clearance and table/desk top height requirements, but in those instances where they did not the tables/desks could be adjusted and raised as needed or adjustable/compliant desks could be brought into a classroom to address an accommodation. Specialized classrooms such as science labs do not meet accessibility requirements for tables and desks.

The HS Teacher's Planning sink is 2" too high and lacks knee clearance. The Junior High School Teacher's Lounge sink is 2" too high and lacks knee clearance.

The High School elevator lacks a tactile star on the main level.

Some doors have glass panes that exceed the maximum height of 43" under the 2010 ADA Standards.

The asphalt walkway in the High School courtyard has areas of deterioration, heaving and abrupt changes in level surface of up to 2".

Interior Stairs

High School Stairwell #1 has an interior railing that is 2½" in outside diameter, which is ½" too wide and the railing is also 4" too low.

The stairs by the High School Library have interior railings that are 2" too low and don't have bottom extensions.

The stairs at the High School Tech Ed have railings on only 1 side of the stairs and which also lack top and bottom extensions.

The Junior High School Stairwells #1, 2, and 3 have inside railings that are 30" to 32" a.f.f., which are 2" to 4" too low. In addition, there is reduced headroom of less than 80" on Level 1 at the 3 stairwells.

High School Interior Ramps

The running slope of the ramp to the Band Room varies from 8.4% to 8.6%, with a roughly 4 foot segment near the top of the ramp having a running slope of up to 9.8%. In addition, approximately 13 feet of the upper outside railing near the top of the ramp has a height of 32½" to 33¾" a.f.f. to the top of the gripping surface, which is too ¼" to 1½" too low.

The ramp from Class Room #132 to Class Room C#124 has upper railings on both sides of the ramp going down for a distance of roughly 20 feet to 22 feet with heights of 32½" to 33" a.f.f. to the top of the gripping surface, which is 1" to 1½" too low.

Approximately 5 feet of the HS Level 2 top upper left side ramp railing (going down) has a height of 33" to 33¾" a.f.f. to the top of the gripping surface, which is too ¼" to 1" too low.

Drinking Fountains

High School drinking fountains are "low" only. The Level 1 Junior High School "high-low" drinking fountain is a protruding object on the "high" side at 33½" a.f.f. with an 8¼" protrusion. The Level 2 Junior High School drinking fountains are both "high" and protruding objects at 33" a.f.f. with a 9½" protrusion. Note: The Level 2 JHS drinking fountains were not in service at the time of assessment.

High School and Junior High School Hallway Lockers

Hallway lockers have shelving that is 54" a.f.f. with 52" high coat hooks, which both exceed the maximum reach range height of 48" under the 2010 ADA Standards.

Cafeterias A and B

It appears that the dining tables in both Cafeterias lack the minimum required knee depth and clear width.

High School Band Room

There is no accessible route of travel to all levels on the band room and to the practice rooms and instrument lockers.

High School Specialty Class Room Sinks

- Home Economics Room (B113). All of the 5 sinks are 2" too high and lack knee clearance. Dispensers (soap and towel) are 4" to 6" too high and over a 20" obstruction (counter). The 3 stoves have controls on the back and not the front of the stove.
- Arts and Crafts Room (D200). All of the 4 sinks are 2" too high and lack knee clearance. Dispensers (soap and towel) are 2" to 3" too high and over 24" obstructions (counter).
- Science (A207, A205, A203). The classroom sinks/counters (6 per classroom) are 36" a.f.f, which are 2" too high, lack knee clearance, and have faucets that require pinching and twisting of the wrist. The Emergency Shower Pull is 10" to 11" too high. The Emergency Eyewash is 36" a.f.f., which is too high for a wheelchair user and lacks knee clearance. Note: Room A207, A205, A203 also have a 34" high sink with no knee clearance and lever style hardware.

The shared Prep Room sinks are 2" too high, lack knee clearance, and have faucets that require pinching and twisting of the wrist.

- Science A201 classroom sink/counter (1) is 36" a.f.f, which is 2" too high, lacks knee clearance, and has faucets that require pinching and twisting of the wrist.

Junior High School Specialty Class Room Sinks

- Science Room (E136, E138, E228). Eight (8) sinks are 2" too high and lack knee clearance. One (1) sink in Room #E136 is 30" high, but lacks knee clearance. All but one sink has faucets that require pinching and twisting of the wrist. The Emergency Shower Pull is 10" too high. The Emergency Eyewash is 34" a.f.f., which is too high for a wheelchair user and lacks knee clearance. Note: It appeared that the student sinks in E228 were not in service at the time of assessment. .

High School Library

Both the round and rectangular tables (approximately 31 in total) provide only 24¼" of knee clearance, which is 2¾" too low. The computer stations are on tables that provide only 25½" to 26" of knee clearance.

High School Locker Rooms

The Boy's Locker Room has 4 separate locker areas. The showers are "communal style" with a 5½" abrupt change in level surface to access and lack accessible features. The lockers require pinching and twisting of the wrist to operate, have shelving that is 16½" too high, and coat hooks that are 12" too

high. Three of the locker areas have benches that are only 15½" high, which is 1½" too low; are only 9½" wide; lack back support; and lack sufficient clear width between the benches and lockers. One of the locker areas has a bench that is 9" too wide and lacks back support.

The Girl's Locker Room has 2 separate locker areas. None of the single user showers are accessible with inadequate clear widths and no accessible features. None of the showers are in service with the area currently being used solely for storage. The lockers require pinching and twisting of the wrist to operate, have shelving that is 16½" too high, and coat hooks that are 12" too high. The locker areas have benches that are only 16" to 16½" high, which is ½" to 1" too low; are only 9½" wide; lack back support; and lack sufficient clear width between the benches and lockers.

Locker Room Office Showers lack accessible features. As these areas appear to be used solely for storage, modifications would only be required if put back into use and if necessitated due to a reasonable accommodation request.

High School Auditorium

According to the posted Certificate of Occupancy, the auditorium accommodates 516 persons. Based on the occupancy, a minimum of 7 wheelchair seating spaces are required and to be dispersed in more than one location. In addition, a minimum of 6 armless or removable armrest seating is required. It would appear that 3 to 4 wheelchairs could be accommodated at the back of the auditorium and 3 to 4 wheelchairs could be accommodated at the front of the auditorium. In addition, 6 removable armrest seats are provided with appropriate signage on the seats. However, there is no posted signage at or near the entrance to the auditorium notifying patrons as to the availability of the removable armrest seating. There is also no signage as to the availability of an Assistive Listening System.

The stairs (2) to the stage have railings that are not round or oval in shape and lack compliant top and bottom extensions.

Staff and Student Bathrooms

The bathrooms have varying areas of non-compliance including coat hooks, and dispensers that are too high. In some cases, stall door coat hooks were missing. Sink faucets with self-closing valves do not stay open for 10 seconds. Water closet near, far, and front clearances are not fully met. Toilet paper dispensers are too close to the front of the water closet. Side and rear grab bars are up to 1½" too high. Rear grab bars are too far from the interior corner. Accessible stalls have doors that are not self-closing, open in and not out, and lack interior and/or exterior pull devices. Some of the stall doors have locking mechanisms that require pinching and twisting of the wrist.

Kitchen

The kitchen area itself has numerous elements of non-compliance (dispenser reach range, sink knee clearance, sink knee height, sink knee depth, sink piping not wrapped, non-compliant clear widths, etc.). In addition, the staff bathroom lacks signage, has a toilet paper dispenser that is too close to the front of the water closet, a mirror that is too high, a restricted clear width in front of the water closet due to a cabinet, and side and rear grab bars that are ½" too high. As these areas are closed to public and require personnel who must meet certain physical requirements to perform the essential functions of their position, unless dictated by a request for a reasonable accommodation, no further action is required at the present time.

Junior - Senior High School Accessibility Assessment

General Description of Obstacle	2010 ADAAG	MAAB 521 CMR	Type of Action to be Taken	P	F	TF	Cost Estimate
Designated Accessible Parking <p>The 3 accessible parking spaces and access aisles near the High School front entrance have running slopes that vary from 2.6% to 3.0%. Signage for the spaces is 6" to 9" too low.</p> <p>The 3 accessible parking spaces and access aisles at the C1 High School entrance has one space which lacks signage with the other 2 spaces having signage that is 1" to 4" too low. Signage is leaning and tilted.</p> <p>The single accessible parking space near the B6/B5 High School egress lacks striping and has signage that is 10" too low.</p> <p>The 2 accessible parking spaces for the Junior High School have running slopes that vary from 2.2% to 3.4% and lack signage. In addition, the spaces are located too far from the Junior High School entrance.</p> <p>See Photos High School 1, 2, and 3.</p>	206 208 502	20 23	<p>The 3 front High School accessible spaces and access aisles and 2 front Junior High School accessible spaces and access aisles s/b reconstructed/repaved such that the slopes do not exceed 2% in any direction.</p> <p>Provide signage for each accessible space that is a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located no more than 10' in front of the space. Signage must also be reset so not leaning</p> <p>Provide striping for the accessible parking near the B6/B5 High School entrance.</p> <p>Provide additional compliant accessible parking that is close to the Junior High School entrance.</p>	1	2,3	I	Up to \$7,500+
Accessible Routes of Travel <p>There is no accessible route of travel from the front Junior High School parking to the Junior High School entrance as the only route of travel is by using the driveway and traversing over speed humps</p> <p>The painted crosswalk from the High School Egress B3 to the Junior High School Entrance A1 ends in a 5" abrupt change in level surface on the Junior High School side. In addition, there is no designated or painted route of travel to the ramp and no detectable warnings with truncated domes.</p> <p>The asphalt walkway to the Junior High School entrance has a running slope of up to 10.0%+ for the roughly 6 feet before the landing and has a 1"+ abrupt change in level surface in the transition from asphalt to concrete at the top of the walkway.</p> <p>See Photos High School 4, 5, and 6.</p>	206 403 403 705 403.3 403.4	20 22 22 22.3 22.4	<p>As feasible, create an accessible route of travel in compliance with Section 403 of the 2010 ADA Standards and Section 22 of 521 CMR from the parking to the entrance.</p> <p>Stripe an accessible route of travel to the concrete ramp and asphalt walkway with detectable warning strips where required.</p> <p>Modify/reconstruct the top of the asphalt walkway such the running slope is less than 8.3% and provide paired railings in compliance Section 505 of the 2010 ADA Standards and Section 24.5 of 521 CMR. Grind the concrete to eliminate the abrupt change in level surface with a maximum unbeveled height of ¼" or up to ½" if beveled with a no more than 1:2 slope.</p>	1 1 1	3 3 3	N N N	TBD Up to \$2,500+ Up to \$5,000
Exterior Stairs and Railings <p>The stairs at the High School front parking have railings which lack top and bottom extensions.</p>	504	27	Compliant railings must be provided at all 6 identified locations as follows:	1, 2	3	N	Up to \$7,500+

<p>The High School B1 Egress from the cafeteria has 2 steps which lack railings.</p> <p>The High School A2 Egress lacks stair railing extensions on the right side of the stairs (facing the building).</p> <p>The High School Main Entrance has stairs with railings that lack top extensions.</p> <p>The Junior High School B1 Egress stairs lack railings.</p> <p>The steps at the Junior High School A1 entrance from the High School B3 egress has 3 steps with no railings.</p> <p>See Photos High School 7, 8, 9, and 10.</p>			Continuous stair railings must be located on both sides of the stairs. Railings s/b between 34" – 38" a.f.f. to the top of the railing, circular or oval in x-section, 1½" – 2" in outside diameter, and with extensions at the top (12" parallel to the ground) and bottom as feasible (slope distance one tread then 12" parallel to the ground).				
<p>Exterior Ramps and Railings</p> <p>The ramp to the High School C1 entrance has a railing on one side only. In addition, the existing railing does not extend beyond the base of the ramp.</p> <p>The concrete ramp to the Junior High School entrance has running slopes that vary from 9.0% to 12.4%, has areas of deterioration, and segments of the lower railing (left side) that are up to 2" too high for approximately 6+ feet.</p> <p>See Photos High School 11 and 12.</p>	<p>505</p> <p>405.2 505</p>	<p>24.5</p> <p>24.2 24.5</p>	<p>Provide paired railings on both sides of the ramp at a height of 18" to 20" a.f.f. (lower railings) and 34" to 38" a.f.f. (upper railings) with top and bottom 12" extensions parallel to the ground.</p> <p>Modify/reconstruct the ramp such that the running slopes do not exceed 8.3%. Modify/reset the railings such that the lower railings are 18" to 20" a.f.f. to the top of the gripping surface.</p>	<p>1</p> <p>1</p>	<p>3</p> <p>3</p>	<p>N</p> <p>N</p>	<p>Up to \$5,000</p> <p>TBD</p>
<p>Airphone Buzzers</p> <p>The High School Main Entrance and C1 Entrance airphone buzzers (2) are 59" a.f.f., which are 11" too high under the 2010 ADA Standards. The Junior High School Entrance airphone buzzer is 49½" a.f.f.</p>	<p>308.2 308.3</p>	<p>6.5 6.6</p>	Lower the airphone buzzers to a height of no more than 48" a.f.f.	1	3	I	Up to \$1,500
<p>Exterior and Interior Doors</p> <p>Exterior and interior doors with closers (including bathrooms) do not fully comply with the maximum allowed operating force for an exterior door (15 lbs.), interior door (5 lbs.) and minimum closing speed requirement of 6 seconds under 521 CMR.</p>	<p>404.2.8 404.2.9</p>	<p>26.8 26.9</p>	Adjust door closers such that the push/pull force does not exceed 15 lbs for an exterior door and 5 lbs. for an interior door with door closing speeds of at least 6 seconds.	1, 3	2	I	\$0
<p>Door Signage</p> <p>Tactile designation signage is not provided at the following locations:</p> <p><u>High School Main Level</u></p> <ul style="list-style-type: none"> Room A103 at C1 Egress Doors 	703	41.1	Install, replace, and/or relocate accessible compliant designation signage on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest	2	2,3	I	Up to \$5,000

<ul style="list-style-type: none"> • Nurse's Office • Faculty Hallway entrance to Main Office • Guidance • Guidance interior (2) • Support Services • Support Services interior (6) • Homemaking • Café B Hallway (2) • Café B interior (3) • Storage by All Gender BR's • Café A Hallway (1) • Café A interior (4) • Machine Room by Elevator • Door to Café A to Exit 133 • Door by interior stairs near Library • Library from Hallway (2) • Classroom Egress Door by Exit E1 • Hallway Storage Closets across from Stage (2) • CATV across from Stage • Stage across from #A143 • Basement Door • Computer Lab Doors by C120 • Pupil Services from Hallway • Pupil Services Interior (2) • D110 • Door to Gym from Hallway across AD's Office • A143 Storage • A143 pass-thru • Band interior (2) • Tech Ed (3) • C120 Storage • C120 Door to Mechanicals • Library Door to IT • Library Work Room • Door to Storage/ Mechanicals from Classroom #A110 • Front Office Conference Room (1 of 2 doors) • Nurse's Office from Hallway (1 of 2 doors) • Boy's Locker Room (4 interior) <p><u>High School Level 2</u></p> <ul style="list-style-type: none"> • Door at Base of Ramp • Officer Gasco • B216 • B209 • Arts and Crafts to Side Classroom • No Directional Signage at Catwalk to Junior HS • Room A211 at Door near Catwalk • Door to A207 Shared Prep 			<p>character. Under 521 CMR, signage s/b 60" a.f.f. to the centerline of the sign. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).</p> <p>Signage must properly identify the current use of rooms and offices.</p> <p>Items (paper, etc.) blocking signage must be removed.</p>				
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<p>Room</p> <ul style="list-style-type: none"> • Door to A205 Shared Prep Room • Door to A203 Shared Prep Room • Door to A210 Shared Prep Room • A201 • A215 (2 doors) <p><u>Junior High School</u></p> <ul style="list-style-type: none"> • Door to E105 by Stair 3 • Door to E130 by Stair 1 • Door to E206 near Stair 3 • E227 • E229 Storage • E233 Small Office • Egress Doors <p>Tactile designation signage is not at the correct height at the following locations:</p> <p><u>High School</u></p> <ul style="list-style-type: none"> • Men's BR at school store (58½" o.c. a.f.f.) • Women's BR at school store (58½" o.c. a.f.f.) • Band Double Doors (58½" o.c. a.f.f.) • Nurse's BR (66" o.c. and on door) • All Gender BR at Café on Left (56½" o.c. and on door) • All Gender BR at Café on Right (66½" o.c. and on door) <p><u>Junior High School</u></p> <ul style="list-style-type: none"> • E111 (61½" o.c. a.f.f.) • Admin Office Interior (61½" o.c. a.f.f.) • Admin Office Storage Interior (61½" o.c. a.f.f.) • Storage at Stair 3 (61½" o.c. a.f.f.) • E210 (61½" o.c. a.f.f.) • E211 (62" o.c. a.f.f.) <p>Tactile designation signage is improperly identified at the following locations:</p> <p><u>High School</u></p> <ul style="list-style-type: none"> • B112 • Athletic Trainer's Office <p><u>Junior High School</u></p> <ul style="list-style-type: none"> • Guidance 							
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<p>Tactile designation signage is not on the latch side or is located on the door at the following locations:</p> <p><u>High School</u></p> <ul style="list-style-type: none"> • All Gender Bathrooms (2) near Café B (on door) • Library Office • Classroom #A110 Office • Nurse's Office (on door) • Nurse's BR (on door) <p>Tactile designation signage is blocked or covered at the following locations:</p> <p><u>High School</u></p> <ul style="list-style-type: none"> • Principal/Admin Assistant • Support Services • Homemaking • Vice Principal • Level 2 Arts and Crafts Kiln Room <p><u>Junior High School</u></p> <ul style="list-style-type: none"> • Junior HS Guidance • Vice Principal/AA <p>In addition, the High School elevator lacks a tactile star on the main level.</p> <p>See Photos High School 13, 14, 15, and 16.</p>							
<p><u>Door Hardware</u></p> <p>The following doors have non-compliant knob style hardware:</p> <p><u>High School</u></p> <ul style="list-style-type: none"> • Basement door • A143 Pass-through door • Tech Ed interior 	404.2	26.11	<p>Install lever-style or similar accessible compliant hardware on the doors.</p> <p><i>Note: Depending on the door and type/quality of hardware, lever hardware may vary from \$75 to \$275 per unit. The estimate provided is at the mid-range (\$150) for the interior doors.</i></p>	2	2	I	Up to \$300+
<p><u>Doors with Glass Panes</u></p> <p>Hallway and room doors have glass panes that vary from 46" to 60½" a.f.f. This includes:</p> <p><u>High School</u></p> <ul style="list-style-type: none"> • Principal/AA • Guidance • Guidance interior (3) • Nurse's Office • Café A • A143 • A143 pass-through • Hallway double Doors near Library • Library Work Room • Library Office • A110 • Band Double Doors • CATV interior (2) 	404.2.11	NA	<p>Doors, gates, and side lights adjacent to doors or gates, containing panels that permit viewing through the panels shall have the bottom of at least one panel located 43 inches maximum a.f.f.</p> <p>Frost or block the office/room glass panes.</p> <p>Keep the hallway doors in a fixed or open position.</p>	4	2	I	\$0

<ul style="list-style-type: none"> Doors to Shared A205/A207 Prep Room (2) Doors to Shared A201/A203 Prep Room (2) <p><u>Junior High School</u></p> <ul style="list-style-type: none"> Vice Principal E133 E229 Storage E233 							
<p><u>High and Junior High School Hallway Lockers</u></p> <p>Hallway lockers have shelving that is 54" a.f.f. and coat hooks that are 52" a.f.f.</p>	308.2 308.3	6.5 6.6	At least 5% of the lockers per Level, or as required, should have shelving and coat hooks within reach range at a height of no more than 48" a.f.f. Lower the shelving and hooks as necessary.	4	2	I	\$0
<p><u>Protruding Objects</u></p> <p><u>High School</u></p> <ul style="list-style-type: none"> Fire alarm strobe by #110 (5" protrusion at 76½" a.f.f.) Fire alarm strobe by interior stairs near Library (5" protrusion at 78¼" a.f.f.) Defibrillator outside Teacher Planning (7" protrusion at 39½" a.f.f.) Shelf in Exercise Room (6½" protrusion at 46" a.f.f.) Gym fire alarm cages (4 with 6" protrusions at 75" a.f.f.) Café A towel dispenser (7" protrusion at 48" a.f.f.) Level 2 drinking fountain near #224 (8" protrusion at 28" a.f.f.) Nurse's medicine box (10" protrusion at 36 ½" a.f.f.) Level 2 hallway fire alarm strobes (3 with 5¼" protrusion at 76" to 77" a.f.f.) Level 2 hallway fire alarm strobe near Ramp to A201-A215 (5¼" protrusion at 77¾" a.f.f.) Level 2 Defibrillator near Catwalk to Junior High School (7" protrusion at 36" a.f.f.) <p><u>Junior High School</u></p> <ul style="list-style-type: none"> Level 1 Defibrillator near Boy's BR/Elevator (9" protrusion at 38½" a.f.f.) Level 1 Hallway drinking fountain (8¼" protrusion at 33½" a.f.f.) Level 1 hallway fire alarm strobes near E136 and E105 (5½" protrusions at 75" to 76" a.f.f.) Level 2 Hallway drinking 	307.2	20.6.1	<p><i>Protruding objects extend more than 4" into the accessible route of travel between a height of 27" and 80" a.f.f. or have vertical headroom clearance reduced to less than 80".</i></p> <p>Erect wing walls on the sides of the drinking fountains, dispensers, defibrillators, and exercise room shelf.</p> <p>Raise the hallway fire alarm strobes.</p> <p>Replace the gym fire alarm cages with ones that do not extend more than 4" from the wall.</p> <p>Install a protective railing below the stairs.</p>	4	2,3	N	TBD – up to \$7,500+

<p>fountains at E212 and E213 (9½" protrusion at 33" a.f.f.)</p> <ul style="list-style-type: none"> In addition, Level 1 Stairs 1, 2, and 3 have reduced headroom at a height of 42" to 80" a.f.f. <p>See Photos High School 17 and 18.</p>							
<p>Reach Range The following exceed the maximum reach range height for an adult under the 2010 ADA Standards:</p> <p><u>High School</u></p> <ul style="list-style-type: none"> Guidance Office drop boxes (3 at 56" a.f.f.) Student Support drop boxes (1 at 54" a.f.f.) Sanitizer near D110 (52" a.f.f.) Front Office Conference Room sanitizer (62" a.f.f.) Exercise Room coat hooks (6 at 62" a.f.f.) Classroom sanitizers (up to 52" a.f.f.) Classroom pencil sharpeners (up to 65" a.f.f.) Classroom and Room telephones (up to 60" a.f.f.) <p><u>Junior High School</u></p> <ul style="list-style-type: none"> Classroom sanitizers (up to 52" a.f.f.) Classroom pencil sharpeners (up to 65" a.f.f.) Classroom and Room telephones (up to 60" a.f.f.) 	308.2 308.3	6.5 6.6	<p>The maximum reach range is 48" a.f.f. under the 2010 Standards.</p> <p>Items need to be lowered to a height of no more than 48" a.f.f. at the operating/opening mechanism. At least one coat hook at a height of no more than 48" a.f.f. s/b provided in the Exercise Room.</p> <p>Telephones in common areas (ie – cafeterias) should be lowered to fall within reach range. Classroom telephones s/b lowered as necessary as a result of a reasonable accommodation request.</p>	2, 4	2	I	Up to \$250+
<p>Unsecured Rugs Classrooms have rugs/carpets that are not fully secured and serve as a tripping hazard.</p>	302.2	29.3	Remove or secure the rugs/carpets.	4	2	I	\$0
<p>Drinking Fountains The following are "low" only drinking fountains:</p> <p><u>High School</u></p> <ul style="list-style-type: none"> Near Principal's Office Near #224 Near Level 2 Bathrooms (2) <p>The following are "high" only drinking fountains:</p> <p><u>Junior High School</u></p> <ul style="list-style-type: none"> Level 2 near #213 and #212 <p><i>Note: Some of the drinking fountains were not in service at the time of assessment.</i></p>	211 307 305 306 309 602	36	<p>Drinking fountains must be both "high and low".</p> <p>Option #1: Discontinue use of the drinking fountains.</p> <p>Option #2: Install adjacent "high or low" fountains as follows: protruding objects compliance of no > 4" protrusion between 27" and 80" a.f.f., the spout height s/b 38" min a.f.f. to 43" max a.f.f. for "high" and no more than 36" a.f.f. for "low", the controls s/b operable w/one fist and no > 5 lbs force, "low" fountains must have at least 27" of knee clearance, and the water flow height must be at least 4" high.</p>	2 2	2 3	I N	<p>\$0</p> <p>Up to \$7,500+</p>

<p><u>Clear Widths</u></p> <p>Nurse's Office: The clear width at the entrance door is reduced to 24" due to chairs. The clear width at the Exam Room is reduced to 24" due to a chair and a wheel cart.</p> <p>Class Rooms: Class Room clear widths vary and are less than 36" in areas due to the placement of tables, desks, book shelves, etc.</p> <p>See Photo High School 19.</p>	403.5	20.3	Rearrange desks, equipment, chairs, etc. to achieve the minimum required 36" clear width of 36".	2	2	I	\$0
<p><u>Courtyard</u></p> <p>The asphalt walkway has areas of heaving and abrupt changes in level surface of up to 2".</p> <p>See Photo High School 20.</p>	403.4	22.4.1	Reconstruct and repave the walkway to eliminate the abrupt changes in level surface.	2	3	N	Up to \$3,500
<p><u>Teacher Planning and Lounge Sinks</u></p> <p>The HS Teacher's Planning sink is 2" too high and lacks knee clearance. The Junior High School Teacher's Lounge sink is 2" too high and lacks knee clearance.</p> <p>See Photo High School 21.</p>	606.3 306.3	32.7	Modify the counters and sinks so that they are no more than 34" a.f.f. at the top and there is a minimum of 27" knee clearance at the sink with guarded, wrapped, or insulated piping.	4	3	N	Up to \$3,000
<p><u>Interior Stairs</u></p> <p>High School Stairwell #1 has an interior railing that is 2½" in outside diameter, which is ½" too wide and the railing is also 4" too low.</p> <p>The stairs by the High School Library have interior railings that are 2" too low and don't have bottom extensions.</p> <p>The stairs at the High School Tech Ed have railings on only 1 side of the stairs and which also lack top and bottom extensions.</p> <p>The High School Auditorium stairs to the stage (2) have railings that are not round or oval in shape and lack compliant top and bottom extensions.</p> <p>The Junior High School Stairwells #1, 2, and 3 have inside railings that are 30" to 32" a.f.f., which are 2" to 4" too low.</p> <p>See Photos High School 22, 23, 24, and 25.</p>	505	27	Replace and/or modify the existing railings with ones that are between 34" – 38" a.f.f. to the top of the railing, circular or oval in x-section, 1¼" – 2" in outside diameter, and with extensions at the top (12" parallel to the ground) and bottom (slope distance one tread then 12" parallel to the ground).	4	3	N	Up to \$100K+
<p><u>High School Interior Ramps</u></p> <p>The running slope of the ramp to the Band Room varies from 8.4% to 8.6%, with a roughly 4 foot segment near the top of the ramp having a running slope of up to 9.8%. In addition, approximately 13 feet of the upper</p>	405.2 505.4	24.2 24.5	Due to the limited ramp run exceeding the maximum allowed running slope of 8.3%, as well as the extensive cost to modify/reconstruct the ramp, it is recommended that a variance be sought to retain the ramp in its current condition	2	1,2	I	\$0

<p>outside railing near the top of the ramp has a height of 32½" to 33¾" a.f.f. to the top of the gripping surface, which is ¼" to 1½" too low.</p> <p>The ramp from Class Room #132 to Class Room C#124 has upper railings on both sides of the ramp going down for a distance of roughly 20 feet to 22 feet with heights of 32½" to 33" a.f.f. to the top of the gripping surface, which is 1" to 1½" too low.</p> <p>Approximately 5 feet of the HS Level 2 top upper left side ramp railing (going down) has a height of 33" to 33¾" a.f.f. to the top of the gripping surface, which is ¼" to 1" too low.</p>			The ramp railings are attached to separate metal brackets that are affixed to the wall. The brackets are positioned in numerous locations along the ramp railings and secured by screws at each bracket. The screws for the brackets to the railing should be slightly backed out and spacers inserted between the bracket and railing to make up the ¼" to 1½" in height to bring the railings into compliance with the 34" to 38" a.f.f. height ranges.				
<p><u>Cafeterias A and B</u></p> <p>It appears that the dining tables in both Cafeterias lack the minimum required knee depth and clear width.</p>	902	35	A minimum of 5% of the tables s/b accessible. Provide at least one table that has a minimum knee clearance of 27" a.f.f., a minimum knee depth of 19", and a minimum clear width of 30".	2	2	I	Up to \$500
<p><u>High School Band Room</u></p> <p>There is no accessible route of travel to all levels on the band room and to the practice rooms and instrument lockers.</p> <p>See Photo High School 26.</p>	206	20	Reconstruct and reconfigure the Band Room to provide ramped or mechanical (a permanent or portable vertical platform lift or a one-person inclined stair lift) between levels.	2	3,4	L	TBD
<p><u>Library Desk/Table Knee Clearance</u></p> <p>Both the round and rectangular tables (approximately 31 in total) provide only 24¾" of knee clearance, which is 2¾" too low. The computer stations are on tables that provide only 25½" to 26" of knee clearance.</p> <p>See Photo High School 27.</p>	226.1 306.2 306.3	35	Block at least one desk/table at each separate location to achieve 27" of knee clearance. If blocking not feasible, replace as necessary with desks/tables that have 27" knee clearance.	2	2	I	\$0 to \$1,000
<p><u>High School Specialty Class Room Sinks</u></p> <ul style="list-style-type: none"> Home Economics Room (B113). All of the 5 sinks are 2" too high and lack knee clearance. Dispensers (soap and towel) are 4" to 6" too high and over a 20" obstruction (counter). The 3 stoves have controls on the back and not the front of the stove. Arts and Crafts Room (D200). All of the 4 sinks are 2" too high and lack knee clearance. Dispensers (soap and towel) are 2" to 3" too high and over 24" obstructions (counter). 	804.3.2 306.3 308.2 308.3 804.6.5 804.3.2 306.3 308.2 308.3	32.2 32.6 32.7 6.5 6.6 32.8 32.2 32.6 32.7 6.5 6.6	<p>Modify one counter/sink so it is no more than 34" a.f.f. and there is a minimum of 27" knee clearance at the sink with guarded, wrapped, or insulated piping. Relocate the dispensers or lower so they are no more than 48" a.f.f. Provide a stove with the controls on the front panel.</p> <p>Modify one counter/sink so that it is no more than 34" a.f.f. and there is a minimum of 27" knee clearance at the sink with guarded, wrapped, or insulated piping. Relocate the dispensers or lower so they are no more than 48" a.f.f.</p>	2 2	3 3	N N	Up to \$4,500 Up to \$3,500

<ul style="list-style-type: none"> Science (A207, A205, A203). The classroom sinks/counters (6 per classroom) are 36" a.f.f, which are 2" too high, lack knee clearance, and have faucets that require pinching and twisting of the wrist. <p>The Emergency Shower Pull is 10" to 11" too high. The Emergency Eyewash is 36" a.f.f., which is too high for a wheelchair user and lacks knee clearance. <i>Note: Room A207, A205, A203 also have a 34" high sink with no knee clearance and lever style hardware.</i></p> <p>The shared Prep Room sinks are 2" too high, lack knee clearance, and have faucets that require pinching and twisting of the wrist.</p> <ul style="list-style-type: none"> Science A201 classroom sink/counter (1) is 36" a.f.f, which is 2" too high, lacks knee clearance, and has faucets that require pinching and twisting of the wrist. <p>See Photos High School 28, 29, and 30.</p>	804.3.2 306.3 308.2 308.3 309.4	32.2 32.6 32.7 6.5 6.6 39.5	Purchase at least one ADA Accessible Portable Science Lab for High School student use which adhere to knee clearance and operating mechanism requirements. Lower the emergency pull shower so that the height is no more than 48" a.f.f. to the pull device. Replace the Emergency Eyewash with one that has knee clearance and is useable by a person in a wheelchair.	2	3	N	Up to \$6,500
	606.3 306.3 309.4	32.7 39.5	Modify the counters/sinks so they are no more than 34" a.f.f. and there is a minimum of 27" knee clearance at the sink with guarded, wrapped, or insulated piping and the faucets can be operated with a loose grip or closed fist.	2	3	N	Up to \$3,500
	606.3 306.3 309.4	32.7 39.5	See above on ADA Accessible Portable Science Lab.	2	3	N	See above.
Junior High School Specialty Class Room Sinks							
<ul style="list-style-type: none"> Science Room (E136, E138, E228). Eight (8) sinks are 2" too high and lack knee clearance. One (1) sink in Room #E136 is 30" high, but lacks knee clearance. All but one sink has faucets that require pinching and twisting of the wrist. The Emergency Shower Pull is 10" too high. The Emergency Eyewash is 34" a.f.f., which is too high for a wheelchair user and lacks knee clearance. 	804.3.2 306.3 308.2 308.3 309.4	32.2 32.6 32.7 6.5 6.6 39.5	Purchase at least one ADA Accessible Portable Science Lab for Junior High student use which adhere to knee clearance and operating mechanism requirements. Lower the emergency pull shower so that the height is no more than 48" a.f.f. to the pull device. Replace the Emergency Eyewash with one that has knee clearance and is useable by a person in a wheelchair.	2	3	N	Up to \$6,500
High School Locker Rooms							
<p>The <u>Boy's Locker Room</u> has 4 separate locker areas. The showers are "communal style" with a 5½" abrupt change in level surface to access and lack accessible features.</p> <p>The lockers require pinching and twisting of the wrist to operate, have shelving that is 16½" too high, and</p>	222 803.5 308 903 608 305 304	19.4 6.5 6.6 19.4	<p>If the lockers and showers are in service, then modifications would be required as noted below. If the showers and/or lockers are not in service, then only the areas that are in service would need to be modified.</p> <p>At least one, but not less than 5% of the lockers must be accessible have locking/opening devices that are operable with closed fist and mounted no more than 42" a.f.f. (222; 19.4). Hooks and shelves must be between</p>	2	3	L	TBD

<p>coat hooks that are 12" too high.</p> <p>Three of the locker areas have benches that are only 15½" high, which is 1½" too low; are only 9½" wide; lack back support; and lack sufficient clear width between the benches and lockers. One of the locker areas has a bench that is 9" too wide and lacks back support.</p> <p>The <u>Girl's Locker Room</u> has 2 separate locker areas. None of the single user showers are accessible with inadequate clear widths and no accessible features. None of the showers are in service with the area currently being used solely for storage.</p> <p>The lockers require pinching and twisting of the wrist to operate, have shelving that is 16½" too high, and coat hooks that are 12" too high.</p> <p>The locker areas have benches that are only 16" to 16½" high, which is ½" to 1" too low; are only 9½" wide; lack back support; and lack sufficient clear width between the benches and lockers.</p> <p>See Photos High School 31, 32, 33, and 34.</p>			<p>40" and 48" a.f.f. (2010 ADA Standards 803.5 and 308; 521 CMR 6.5, 6.6).</p> <p>Accessible benches must be provided for the accessible lockers. Seats must be a minimum of 42" long and 20" to 24" deep with back support or affixed to a wall. The back support s/b 42" long minimum from a point 2" above the seat surface to a point 18" above the seat surface. The bench height s/b 17" to 19" a.f.f. A minimum 36" clear width must be maintained between the benches and lockers and around the lockers. In addition, a 5' turning diameter must be maintained near the accessible lockers. (305.3, 903; 19.4).</p> <p>At least one accessible shower must be provided in each locker room (222; 31). The showers must be on an accessible route and must comply w/S. 608 of the 2010 ADA Standards and S.31 of 521 CMR. Shower compartments must be either a transfer type shower (36" x 36" w/a 48" clearance), standard roll-in type shower (30" x 60"), or an alternative roll-in type shower (36" x 60"). A folding or non-folding seat must be provided in transfer type showers (608.4; 31). Grab bars must be between 33" and 36" (608.3; 31) and controls must comply with operable parts (no twisting of wrist, use w/closed fist) and should include an adjustable shower spray unit (608.5; 31). There can be no greater than a ½" beveled (maximum 1:2 slope) lip at the shower entrance (608.7; 31).</p>				
<p><u>Auditorium</u></p> <p>According to the posted Certificate of Occupancy, the auditorium accommodates 516 persons. Based on the occupancy, a minimum of 7 wheelchair seating spaces are required and to be dispersed in more than one location. In addition, a minimum of 6 armless or removable armrest seating is required.</p> <p>It would appear that 3 to 4 wheelchairs could be accommodated at the back of the auditorium and 3 to 4 wheelchairs could be accommodated at the front of the auditorium. In addition, 6 removable armrest seats are provided with appropriate signage on the seats. However, there is no posted signage at or near the entrance to the auditorium notifying patrons as to the availability of the removable armrest seating.</p> <p>The stairs (2) to the stage have railings that are not round or oval in shape and lack compliant top and bottom extensions.</p>	<p>802</p> <p>505.7 505.10</p>	<p>14.2 14.5</p> <p>27.4</p>	<p>Provide signage near the entrance to the auditorium as to the availability of removable armrest seating.</p> <p>Install metal railings on the existing wooden railings that are round or oval in x-section and have top extensions that are 12" parallel to the floor and bottom extensions that are the slope distance of one tread then 12" parallel to the floor.</p>	<p>2</p> <p>2</p>	<p>2</p> <p>2</p>	<p>1</p> <p>1</p>	<p>\$25</p> <p>Up to \$3,500</p>

There also does not appear to be the availability of an assistive listening system (ALS) as there is no signage in the assembly area notifying patrons of an ALS. Based on the number of seats, an ALS with a minimum of 21 receivers is required, of which at least 5 are required to be hearing aid compatible. See Photo High School 35.	219 706	14.5	Provide an assistive listening system which has a minimum of 21 receivers with 5 being hearing-aid compatible. Provide signage denoting availability of the ASL system with the International Symbol of Accessibility for Hearing Loss.	2	3	N	Up to \$10,000
Staff and Student Bathrooms The staff bathrooms have varying levels of non-compliance metered faucets that require more than 5 lbs. to operate and do not stay open for at least 10 seconds; dispensers, coat hooks, and mirrors that are too high; stall doors that open in, are not self-closing, and lack pull devices; improperly mounted toilet paper dispensers; and water closets that do not meet setback requirements among other areas of non-compliance. The items of non-compliance are detailed in Table 1: Millbury Memorial Junior/Senior High School Staff and Student Bathrooms. See Photos High School 36, 37, 38, 39, and 40.	606.4 309.4 603.3 308 604.2 604.3 604.7 309.4 609 604.5 404.2 604.8 307.2	30.9.6 30.11 30.12 30.7.2 30.7.6 30.8.5 30.8 30.6 39.5 20.6.1	The bathrooms will need to be modified in accordance with the standards detailed in Table 2. Adult Bathroom Facilities Compliance Requirements.	3	2,3	I,N, L	\$10,000 to \$20,000

Up to \$215,575+

HIGH SCHOOL STAFF/STUDENT BATHROOMS (1 of 3)

Compliance Item	Front Office W	Front Office M	Girl's @ Guidance	Boy's @ Guidance	Nurse	Teacher Planning	Boy's @ C1 Exit	Girl's @ C1 Exit
Faucets < 5 lbs force								
Metered faucets open 10 seconds								
Mirror 40" a.f.f.		45"						
Soap 42" a.f.f.	45½"	46"						
Towel 42" a.f.f.					Partially over grabs			
Urinal 17" a.f.f.								
Toilet 18" o.c. near					19"	19¼"		
Toilet 42" o.c. far								
Toilet 42" in front	19" (cabinet)							
Toilet 17"-19" a.f.f. rim								
Flush valve on approach side								
TP 7"-9" o.c. to front	4"		4"					
TP at least 24" a.f.f.								
TP min 1½" clearance below the grab bar								
Grab bars 42" long	Both 36"					Both 30"		
Grab bars 33"-36" a.f.f.	37" side 37" rear	36¾" side 36¾" rear	37¼" side 36¾" rear	37" side and rear	37¼" side 37" rear	37" side 37¼" rear	36¾" side 36¾" rear	37½" side 37" rear
Side grab bar 12" max. from interior								
Rear grab bar 6" max from interior		11"	11"	11"	11"	11½"	9"	9"
Stall door self-closing			No	No			No	No
Stall door opens out				No			No	No
Pull device on stall door (Int/Ext)			No interior	No exterior			No int/ext	No Interior
Coat hook 48" a.f.f.			54"	None	53½"	52½"	None	None
Compliant locking mechanism				Requires pinching & twisting			Requires pinching & twisting	
Protruding Object			Sink: 28¾" a.f.f. with a 21" protrusion	Sink: 28¾" a.f.f. with a 21" protrusion				

HIGH SCHOOL STAFF/STUDENT BATHROOMS (2 of 3)

Compliance Item	All Gender/L	All Gender/R	Men's @ C135	Women's @ C135	Boy's Lockers	Girl's Lockers	Boy's PE Instructor	Girl's Coach
Faucets < 5 lbs force								
Metered faucets open 10 seconds	3 seconds	6 to 7 seconds						3 seconds
Mirror 40" a.f.f.								
Soap 42" a.f.f.				43¾"				
Towel 42" a.f.f.								
Urinal 17" a.f.f.								
Toilet 18" o.c. near		19"						
Toilet 42" o.c. far			31"					
Toilet 42" in front			33½"					
Toilet 17"-19" a.f.f. rim								
Flush valve on approach side								
TP 7"-9" o.c. to front	0"	4"			1"	0"	0"	0"
TP at least 24" a.f.f.								
TP min 1½" clearance below the grab bar								
Grab bars 42" long								
Grab bars 33"-36" a.f.f.	36¾" side 37" rear	37" side 36½" rear	37¼" side 36¾" rear	36¾" side	36¾" side 36¾" rear	37" side 37" rear	36¾" side 36¾" rear	36¾" side 36¾" rear
Side grab bar 12" max. from interior								
Rear grab bar 6" max from interior					12"	12"	12"	12"
Stall door self-closing			No		No	No		No
Stall door opens out						No		No
Pull device on stall door (Int/Ext)			No interior	No interior	No exterior	No int/ext		No int/ext
Coat hook 48" a.f.f.	52½"	53"	64"	None	53"	52½"	53"	65½"
Compliant locking mechanism					Requires pinching & twisting			
Protruding Object								

HIGH SCHOOL STAFF/STUDENT BATHROOMS (3 of 3)

Compliance Item	Girl's PE Instructor	Girl's Lockers	L2 Girl's @ #220	L2 Boy's @ #220	L2 Girl's @ Stair 3	L2 Boy's @ Stair 3		
Faucets < 5 lbs force		10 lbs.						
Metered faucets open 10 seconds		2 to 3 seconds						
Mirror 40" a.f.f.								
Soap 42" a.f.f.		47"						
Towel 42" a.f.f.		49"						
Urinal 17" a.f.f.								
Toilet 18" o.c. near	19"							
Toilet 42" o.c. far	31½" (storage)							
Toilet 42" in front	29"		34"					
Toilet 17"-19" a.f.f. rim	0"							
Flush valve on approach side								
TP 7"-9" o.c. to front		2"	4"	2"				
TP at least 24" a.f.f.								
TP min 1½" clearance below the grab bar								
Grab bars 42" long								
Grab bars 33"-36" a.f.f.	36½" rear	36¾" side 37" rear	36¾" side 36¾" rear	36¾" side 36¾" rear	37" side 37" rear	36¾" side 36¾" rear		
Side grab bar 12" max. from interior	12"	11½"	11"	11"				
Rear grab bar 6" max from interior								
Stall door self-closing	No	No	No	No		No		
Stall door opens out	No	No		No		No		
Pull device on stall door (Int/Ext)	No int/ext	No int/ext	No interior		No interior	No int/ext		
Coat hook 48" a.f.f.	64"	None	54"		None	None		
Compliant locking mechanism						Requires pinching & twisting		
Protruding Object		Sanitary Napkin Dispenser: 40½" a.f.f. with a 4¾" protrusion						

JUNIOR HIGH SCHOOL STAFF/STUDENT BATHROOMS (1 of 1)

Compliance Item	Admin	E133 BR	L1 Girl's	L1 Boy's	E215 BR	L2 Girl's BR	L2 Boy's BR	
Faucets < 5 lbs force								
Metered faucets open 10 seconds				5 seconds				
Mirror 40" a.f.f.			44"					
Soap 42" a.f.f.	43½"				43¼" soap			
Towel 42" a.f.f.								
Urinal 17" a.f.f.								
Toilet 18" o.c. near		19¼"						
Toilet 42" o.c. far								
Toilet 42" in front								
Toilet 17"-19" a.f.f. rim								
Flush valve on approach side								
TP 7"-9" o.c. to front			5"			6"		
TP at least 24" a.f.f.								
TP min 1½" clearance below the grab bar								
Grab bars 42" long								
Grab bars 33"-36" a.f.f.	36½" side 36¼" rear	36¼" side 36¼" rear	37" side 37" rear	36¼" side 36¼" rear	36¼" side 36¼" rear			
Side grab bar 12" max. from interior								
Rear grab bar 6" max from interior								
Stall door self-closing				No			No	
Stall door opens out				No				
Pull device on stall door (Int/Ext)			No interior	No interior		No interior	No interior	
Coat hook 48" a.f.f.	53¼"	54"	54"	53½"	53"	53½"	None	
Compliant locking mechanism								
Protruding Object		Towel Dispenser: 38¼" a.f.f. with a 8" protrusion						

TABLE 2. ADULT BATHROOM FACILITIES COMPLIANCE REQUIREMENTS

2010 ADAAG		MAAB 521 CMR		
Entrance and Stall Doors				
Signage	703.4	Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Latch side of door. See exceptions.	41.1	Latch side of door; approach w/in 3"; 60" a.f.f. to centerline of sign.
Hardware	404.2.7	Operable with a closed fist or loose grip	26.11.1	Operable with one hand; roughened surface for hazard areas (26.11.4).
Hardware height	404.2.7	34" to 48" a.f.f.	26.11.2	36" to 48" a.f.f.
Door closing speed	404.2.8.1	5 sec. min. form 90 degrees to12 degrees from the latch.	26.9	At least 6 seconds.
Door opening force	404.2.9	Interior hinged / sliding/folding-5 lbs	26.8.1	Exterior hinged-15 lbs; interior hinged / sliding/folding-5 lbs.
Doorway width	404.2.3	Clear width of 32" minimum.	26.5	Clear opening of 32" min.
Threshold	404.2.5	Not > ½" high. Raised thresholds comply with 302 and 303 (between ¼" and ½" s/b beveled w/slope no > 1:2(50%)).	26.10	Not > ½" high, beveled w/no > 1:2 slope. Sliding door thresholds not > ¾" high and beveled w/no > 1:4 slope.
Handrails - clearance	505.5	1 ½" minimum.	27.4.7	1 ½" from wall. Recessed if max 3"recess and 18" above handrail.
Single User Toilet Room				
Door	213 404.2.3 603.2	In-swing allowed if min. 30"x48" c.f.s. beyond swing of the door (603.2). 32" min. clear width (404.2.3).	30.4	In-swing allowed if self closing device and min. 30"x48" c.f.s. beyond swing of the door.
Clear floor space	604.3.1	60" x 56" minimum.	30.5, 6.3	Clear floor space required (30.5); 60" diameter or a 36" x 60" "T" (6.3).
Toilet Stalls				
# standard accessible stalls	213.3.1	At least one.	30.6	One must be provided
# alternate accessible stalls	213.3.1	If 6 or > stalls/urinals at least one alternate accessible stall must ALSO be provided	30.6	If 6 or > stalls at least one alternate accessible stall must ALSO be provided
Standard Accessible Stall				
Size	604.8.1.1	60" wide x 56" deep for wall hung water closets; 60" wide x 59" deep for floor mounted water closets.	30.6.1	60" wide x 72" deep.
Water closet location	604.2	On rear wall.	30.6.1	On 60" wall.
Door width	404.2.3	32" minimum clear opening, swings out.	30.6.1	32" clear opening, swings out or slides
Door hinge and closing	604.8.1.2 404.2.7	Self-closing hinge; pull device on both sides (604.8.1.2); operable parts 34" min. to 48" max. a.f.f. (404.2.7).	30.6.1	Self-closing hinge; pull device on both sides; lock at approx. 36" a.f.f.
Door swing	404.2	Door must swing out.	30.6	Door must swing out or slide.
Latch side clear space	604.8.1.2	42" min. clear space for side approach to door; door opening s/b 4" max. on side wall or partition farthest from water closet. If door on side, opening s/b 4" max. from front partition.	30.6.1	18" clear space on latch side of door.
Coat hook	603.4 308	Forward (308.2)/side (308.3) reach 15" to 48" max. a.f.f.	30.6.1	Max. 54" a.f.f.
Grab bar location	604.5	Provided on side wall closet to water closet and rear wall. Side wall bar 42" long, 12" max. from rear wall and extending 54" min. from rear wall. Rear wall bar s/b 36" long min. and extend from center of water closet 24" min on transfer side and 12" min on opp. side.	30.8	2 grab bars, 42" long, 1 on back wall above water closet, one on side wall closet to water closet. See Grab bars.

Water Closets				
Clear floor space (no stall)	NA	NA (Stall 60" wide x 56" deep)	30.7.1	30" x 48"(sink); 72" min. between front/rear walls
Location	604.2	Centerline s/b 16" to 18" max from nearest sidewall, except that water closet s/b 17" min to 19" max from the side wall in an ambulatory accessible compartment.	30.7.2	Centerline s/b 18" from nearest sidewall, at least 42" from farthest sidewall, and 42" clearance from front of water closet to nearest wall/fixture
Height	604.4	17"-19" a.f.f. to top of seat.	30.7.3	17"-19" a.f.f. to top of seat.
Flush control	604.6 308	Hand operated or mounted (604.6). 15" min. to 48" max reach range (308). .	30.7.5	Mounted on wide side no > 44" a.f.f.
Toilet paper dispensers	604.7 309.4	7" min and 9" max in front of water closet measured to centerline of dispenser. Outlet s/b 15" min and 48" max a.f.f. S/not be behind grab bars and be a continuous flow (604.7). Minimum 1½" clearance below the grab bar. Operable parts per 309.4.	30.7.6	Mounted on side wall closest to toilet, centerline of roll s/b min. of 24" a.f.f.
			30.8.5	Dispensers shall not be mounted above grab bars.
Grab Bars				
Grab bar location	609.4 604.5	See Standard Accessible Stalls.	30.8.1	Side grab bar s/b no >12" from interior corner; rear grab bar s/b no > 6" from interior corner.
Grab bar height	609.4	33" – 36" a.f.f. to top of gripping surface.	30.8.2	33" – 36" a.f.f.; tank/flushometer variances of height and length.
Grab bar thickness	609.2	Circular x-sect. outside diameter 1¼ " min. to 2" max.; Non-circular x-sect. 2" max. and perimeter of 4" min. and 4.8" max.	30.8.3	1 ¼" – 1 ½" diameter.
Grab bar material	NA	NA	30.8.4	Non-rusting, acid-etched or roughened.
Spacing	609.3	1 ½" between wall & grab bar. Space between grab bars & projecting objects above s/b 12" min.	30.8.3	1 ½" between wall and grab bar. Nothing mounted above.
Sink				
Clear floor space	606.2 305	Forward approach clear floor space of 30"x48"(305.3).	30.9.1 6.3	60" diameter, no more than 19" underneath the sink. 30"x48" forward approach.
Height	606.3	Rim no > 34" a.f.f.	30.9.2	Rim no > 34" a.f.f. Sink min. 17" from wall to front of the sink.
Knee clearance	306.2 306.3	Knee clearance is 9" to 27" a.f.f.; 25" deep max. at 9" a.f.f. or 11" deep min at 9" a.f.f. and 8" deep min at 27" a.f.f. Width of knee clearance s/b 30" wide min (306.3). Toe clearance as part of c.f.s. 17" min – 25" max, 9" high a.f.f., 30" wide (306.2).	30.9.3	27" min. from floor to underneath; 8" from front to back (deep). Minimum of 9" of toe clearance. Toe clearance as part of c.f.s. a max. of 6" of the 48" of c.f.s. may extend into the toe space.
Depth	NA	NA	30.9.4	Not > 6 ½".
Piping	606.5	Insulated, protected, no sharp/abrasive surfaces.	30.9.5	Recessed, insulated or guarded.
Faucets	606.4 309	Operable w/one hand w/max 5 lbs force required (309). Metering faucets must be open 10 secs min (606.4).	30.9.6	Operable w/one hand. If self-closing valves, must be open min. 10 seconds
Urinals				
Required #	213.3.3	Where more than 1 urinal provided, at least one s/b accessible.	30.10	If one or more urinals, at least one must be accessible.
Height	605.2	Stall or wall hung; rim maximum of 17" a.f.f.; 13½ " deep from outer face of rim to back of fixture.	30.10.1	Stall or wall hung; elongated rim; maximum of 17" a.f.f.
Clear floor space	605.3 305	Forward approach clear floor space of 30"x48" (305.3).	30.10.2 6.3	Front approach 30"x48" and 60" diameter turning radius (6.3); 29" clearance between urinal shields (30.10.2).
Flush control	605.4 308 309	Hand operated or automatic (309.4); 15" min – 48" max a.f.f. reach range (308).	30.10.3	Hand operated, automatic; no > 44" a.f.f.

Mirror				
Height	603.3	If over lavatory/countertop, bottom of mirror reflecting surface no > 40" a.f.f.; if not over lav/counter no > 35" a.f.f. if fill length, top s/b 74" min a.f.f.	30.11	Bottom of mirror reflecting surface no > 40" a.f.f.
Dispensers				
Location	205	S/b located on an accessible route.	30.12	One of each device w/in zone of reach
Operation	309.4	Operable w/one fist; no > 5 lbs force.	30.12 39.5	Operable w/one fist; no > 5 lbs force (39.5).
Height	308.2 308.3	Side (308.3) and forward (308.2) reach 15" – 48" a.f.f.	30.12	42" max. a.f.f.
Protruding Objects	307.2	No more than 4" into accessible route between a height of 27" to 80" a.f.f.	20.6.1	No more than 4" into accessible route between a height of 27" to 80" a.f.f.
Controls and Receptacles				
Location	205	S/b located on an accessible route.	30.13 39.00 6.5, 6.6	One of each on an accessible route (30.13); all controls s/b at least 18" from an interior corner (39.00); forward reach 15"–48" a.f.f. (6.5); side reach 9"-54" (6.6).
Height	308.2 308.3	Side (308.3) and forward (308.2) reach 15" – 48" a.f.f.	6.5, 6.6	Forward reach max. of 48" a.f.f. Side reach max. of 54" a.f.f..
Operation	309.4	Operable w/one fist; no > 5 lbs force.	30.13 39.5	Operable w/one fist; no > 5 lbs force (39.5).
Clear floor space	305	Forward approach clear floor space of 30"x48" (305.3).	6.4 39.2	Minimum 30"x48" (6.4, 39.2).
Signage				
Location	703.4	Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Latch side of door. See exceptions.	41.2.1	Wall adjacent to latch side of door or nearest adjacent wall. Reach allowance s/b within 3" of signage.
Height	703.4	Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character.	41.2.2	60" a.f.f. to centerline of sign.
Character proportion	703.5.4	Characters s/b selected from fonts where the width of the uppercase letter "O" is 55% min and 110% max of the height of the uppercase letter "I".	41.3	Width to ht. (3:5-1:1) and stroke-width- height (1:5-1:10).
Character height	703.5.5	Sized according to viewing distance. See Table 703.5.5.	41.4	Sized according to viewing distance.
Brailled characters	703.3 703.4	Grade 2 Braille. Domed or rounded shape (703.3). See Table 703.3.1 for Braille dimensions. Height (703.4).	41.5	Letters/numbers raised 1/32"; upper case; Grade 2 Braille; raised characters 5/8" but no > 2".

Millbury Memorial Junior/Senior High School Accessibility Assessment Photos



Photo High School 1



Photo High School 2

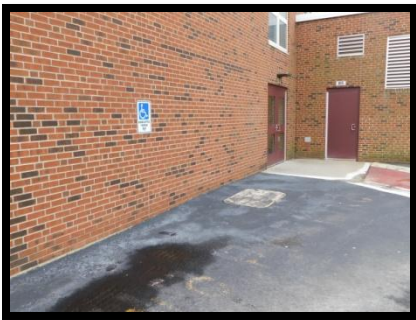


Photo High School 3



Photo High School 4



Photo High School 5



Photo High School 6

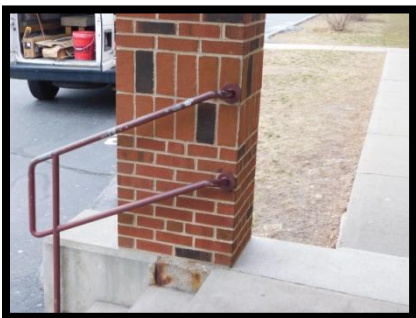


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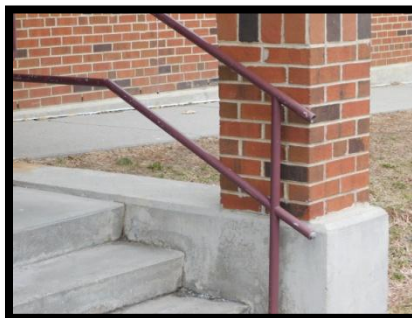


Photo High School 8



Photo High School 9



Photo High School 10



Photo High School 11



Photo High School 12

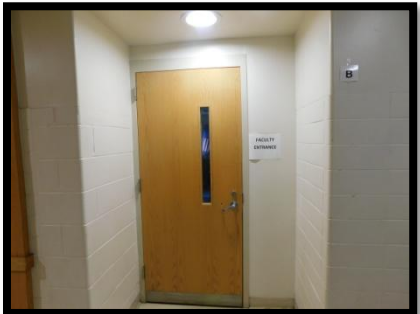


Photo High School 13



Photo High School 14

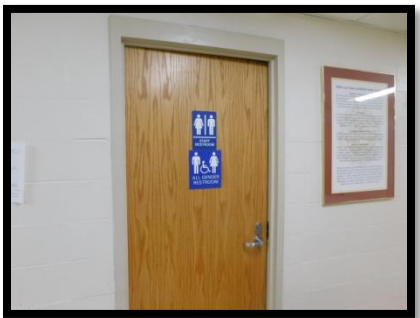


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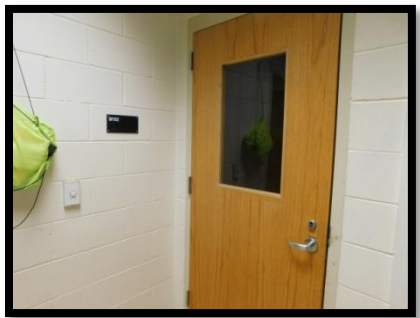


Photo High School 16



Photo High School 17



Photo High School 18



Photo High School 19



Photo High School 20



Photo High School 21

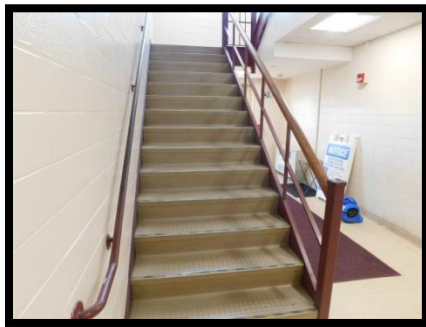


Photo High School 22



Photo High School 23



Photo High School 24

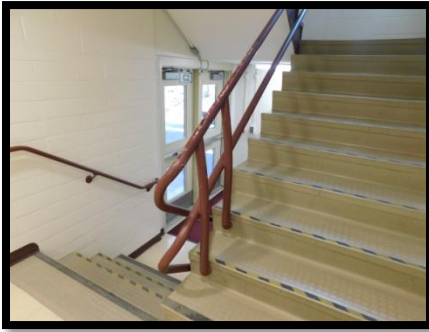


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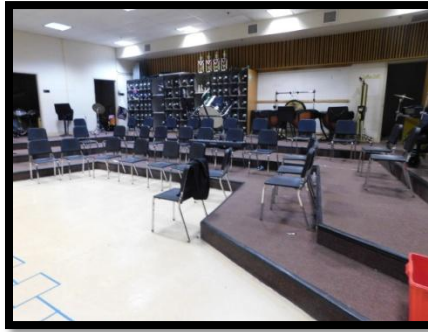


Photo High School 26



Photo High School 27



Photo High School 28



Photo High School 29



Photo High School 30

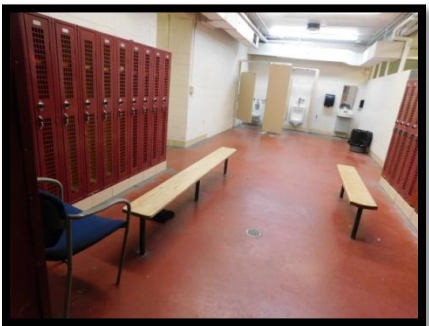


Photo High School 31



Photo High School 32

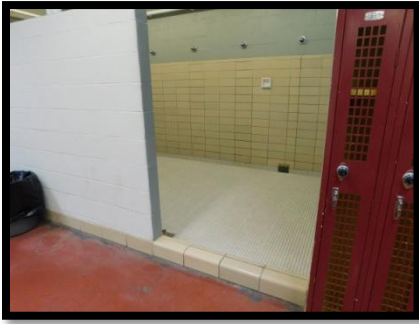


Photo High School 33



Photo High School 34



Photo High School 35

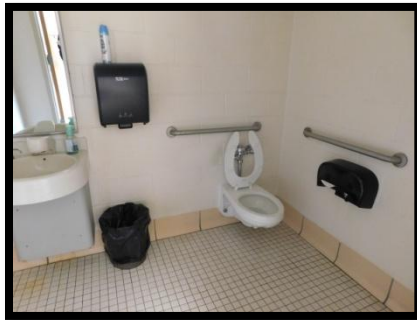


Photo High School 36

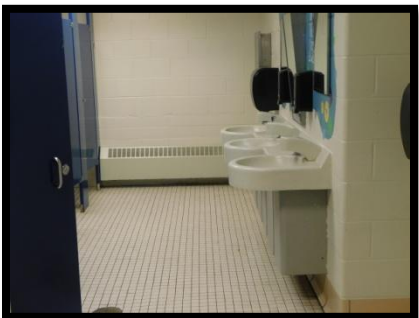


Photo High School 37



Photo High School 38

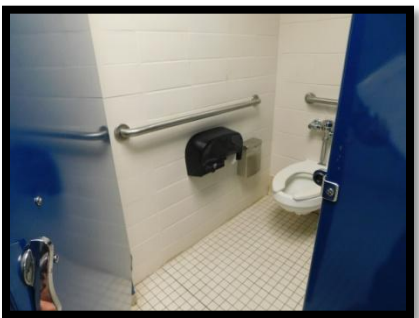


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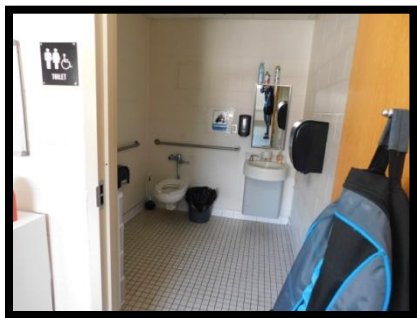


Photo High School 40

XV. RECREATIONAL FACILITIES ASSESSMENTS

PREFACE

PASSIVE RECREATION AND CONSERVATION AREAS

CEMETERIES

EAST MILLBURY PARK

WEST MILLBURY PARK (a.k.a. Vincent D. Jacques Memorial Park)

BUTLER FARM

UPPER & LOWER TOWN COMMON

WASHINGTON STREET PARK

GREENWOOD STREET PLAYGROUND

JAMES DIRENZO PLAYGROUND

WINDLE FIELD

DOWNTOWN MUNICIPAL PARKING LOT

RAYMOND E. SHAW MIDDLE SCHOOL PLAYGROUND AND FIELDS

ELMWOOD STREET SCHOOL PLAYGROUND AND FIELDS

ALUMNI FIELD

PREFACE

Active Recreational Facilities and Public Spaces

Public spaces, recreational facilities and playgrounds are within the jurisdiction of ADA and 521 CMR and therefore must conform to those standards pertaining to accessible routes, reach ranges, height, knee and toe clearance, operating force, running and cross slopes, clear width, maneuverability and similar standards for ancillary features (bathroom, benches, picnic tables, water fountains, parking, etc.). At a minimum, an accessible route must be provided up to the play or recreation area and then to any play equipment, facilities, bleachers, field, or other amenity or feature.

Passive Recreation and Conservation Areas

Passive recreation and conservation areas are not fully addressed under 521 CMR and the 2010 ADA Standards unless there are developed facilities or services provided at a site. This would include such things as picnic tables, grilling stations, benches, and constructed walkways. If parking is provided and access is available, then parking must also be compliant. An unimproved trail through a wooded area or field would not need to be made “accessible” unless formal construction modifications or improvements were undertaken at that site. In most cases, compliance with 521 CMR and the 2010 ADA Standards in conservation and passive recreation areas, would be technologically infeasible or would result in excessive and unreasonable costs without any substantial benefit to persons with disabilities.

Walkways

Walkways in recreation areas include, but are not limited to walks, sidewalks, overpasses, bridges, tunnels, underpasses, plazas, courts, and other pedestrian pathways. Sidewalks on streets and ways are also considered walkways, with the exception that if the slope of the natural topography exceeds 5% (1:20) a ramp is not required.

Playgrounds

Playgrounds standards are new under the 2010 ADA Standards. Although there are changes being discussed under 521 CMR, currently Massachusetts simply requires an accessible route to and around the play area and to the play equipment. The 2010 ADA Standards are much more expansive and incorporates ground-level components, elevated components, component standards and surface types. Note: There is a difference between “ADA Compliant” and “Fully Accessible”. Compliant play structures are generally accessible and are made with the physically disabled in mind. However, fully accessible structures are made specifically for those with disabilities and are typically far more expensive. The language of the ADA makes a distinction between “elevated” and “ground” components. Roughly 25% of a play structure’s components must be on the ground level for it to be ADA compliant. A fully accessible structure has roughly 50% of its components as “ground”. In a fully accessible play system, every component is wheelchair accessible, including elevated areas achieved through the use of ramps.

Although the 2010 ADA Standards do not mandate elevated play equipment, if there is elevated play equipment, then accessible ground level equipment must also be provided.

In addition, the entire play area does not need to be on an accessible surface, but rather the routes of travel to both the play area and the accessible play components must comply with Section 402. Accessible Route and Section 302 Floor or Ground Surfaces (stable, firm, slip resistant) of the 2010 ADA Standards and Section 20 (Accessible Route) and Section 29 (Floor Surfaces) of 521 CMR.

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 is preferred, but does not have to be, of the same material or structure as the general route of travel.

Under the 2010 ADA Standards, apart from the actual accessible pathway, there are two types of ground surfaces within the play area. Ground surfaces on accessible routes must comply with the American Society for Testing and Materials (ASTM) F 1951 and the ground surfaces located within the "use zone" must comply with ASTM F 1292. Ground surfaces must be inspected and maintained regularly to ensure continued compliance with the ASTM Standards. The type of surface selected and play area use level will determine the frequency of inspection and maintenance activities.

Representative Examples of ADA Compliant and Accessible Playgrounds and Play Components



ASTM F 1951 establishes a uniform means to measure the characteristics of surface systems in order to provide performance specifications to be used when selecting materials for use as an accessible surface under and around playground equipment (not the accessible route). Surface methods that comply with this standard and are located in the use zone must also comply with ASTM F 1292 for “impact attenuating” to provide a safe fall area around play equipment.

Within a play area that is not part of an accessible route, turning area or use zone, acceptable materials can include loose fill such as pea gravel, sand, and wood chips. Depending on the fall height of a play structure, materials such as pea gravel, sand, wood chips, shredded rubber and engineered wood fiber all provide different levels of impact attenuation. See Section XI for a more detailed discussion of Accessible Routes and Playground Surfacing Materials.

For fully accessible surfaces, pour in place products, rubber mats and tiles, and artificial grass with rubber in-fill all meet ADA standards but are significantly more expensive.

In Massachusetts, public hearings have recently been held to hear comment on sweeping changes to 521 CMR. Significant changes are proposed that would align 521 CMR more with the 2010 ADA Standards including playgrounds and play areas. The proposed surface related changes are noted below:

Proposed Changes in 521 CMR

59.4 Accessible Routes

An accessible route shall be provided to reach playground equipment and around the perimeter of the playground to play components.

59.4.1 The ground surface of use zones, accessible routes and turning spaces within play areas shall be firm, stable and slip resistant, permanent, and constructed of materials such as rubber resilient surfacing, urethane rubber composites or similar; and comply with commonly accepted impact attenuation criteria for safety surfacing materials within the use zones of play area equipment. Loose fill surfaces and aggregate surfaces including wood fiber, bark mulch, wood chips, shredded rubber, shredded foam, etc. are not acceptable for accessible routes within the playground. Molded rubber mats, if utilized, require adhesion to a permanent surface beneath.

Recreational Facilities Accessibility Improvements Cost Estimates

The cost estimates provided for each recreational facility are rough parameters of cost based on pricing for similar work as well as estimated costs for certain types of modifications. Actual costs on some items may vary considerably due to unforeseen conditions and/or design alternatives. If the required modifications require design solutions, additional architectural and/or engineering fees may be required. In addition, if the work must be formally bid to private contractors, additional costs (bonds, insurance, prevailing wage) will also increase the overall cost. Depending on complexity, suggested base costs could increase up to an additional 30.5% as a total project cost.

PASSIVE RECREATION AND CONSERVATION AREAS

Function and Description of Facility and Programs: Six passive recreation and conservation areas were field checked for accessibility compliance. These are as follows: Colton Road Conservation Area, Dorothy Pond Recreation Area, Stowe Meadows Conservation Area, Davidson Sanctuary, Brierly Pond, and The Old Common. None of these areas offer direct services to the public.



Colton Road Conservation Area



Colton Road Conservation Area



Dorothy Pond Recreation Area



Dorothy Pond Recreation Area



Stowe Meadows Conservation Area



Stowe Meadows Conservation Area



Davidson Sanctuary



Davidson Sanctuary



Brierly Pond



Brierly Pond



The Old Common

Responsible Party: Board of Selectmen, Conservation Commission.

Description of Facilities: These are unimproved properties (trails only or grassed surfaces) with no formal or limited parking. Parking surfaces are grass, loose stone, gravel, and/or asphalt shavings. Although there are paths and trails at some of these sites, none are formally maintained to a standard that would be considered to be an accessible route of travel.

These areas would require modifications to parking (level and firm, stable surface; signage; striping) if the sites are improved, expanded upon, or if amenities such as picnic tables, benches, or grilling areas are added to the facilities. At the time of assessment, no formal amenities, including portable toilets, were found at the sites. Brierly Pond has 2 “ornamental” stone benches at the road side. At a minimum, compliant accessible routes of travel (maximum 5.0% running slope without railings, maximum 2.0% cross slope; minimum 4 feet in width with 3 feet of clear space; stable, firm, slip resistant surface; and no greater than ¼” abrupt change in level surface) would need to be provided to the enhanced or added service or amenity. Unless formal parking, trail improvements, or amenities are initiated, no further action is required at the present time.

CEMETERIES (Town-wide)

Function and Description of Facility and Programs: Burial grounds for the deceased. There are four town cemeteries in Millbury. These are as follows: Central Cemetery, Country Bridge Cemetery, West Millbury Cemetery, and Dwinell Cemetery.

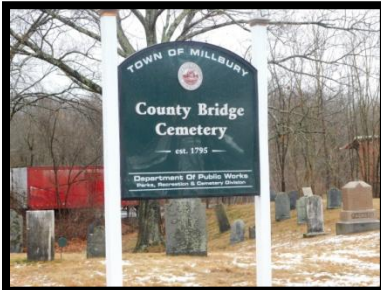
West Millbury Cemetery



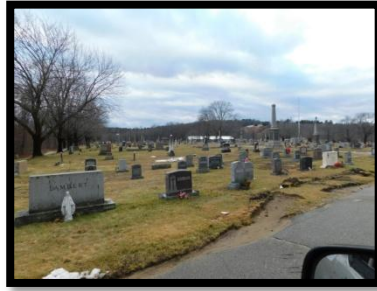
Dwinell Cemetery



Country Bridge Cemetery



Central Cemetery



Responsible Party: Department of Public Works, Cemetery Commission

General Description or Obstacle Which Limits Mobility or Access: There is no dedicated public access or accessible routes to or within these areas. None of these cemeteries offer direct services to the public.

West Millbury Cemetery has 3 stone steps into the cemetery as well as gated vehicle access. There are no formal road ways in the cemetery.

Dwinell Cemetery has 2 stone steps into the cemetery and gated vehicle access. There are no formal roadways in the cemetery.

Country Bridge Cemetery has open access into the cemetery with no formal roadways in the cemetery.

Central Cemetery has open access into the cemetery with paved roadways throughout. A small employee only building with 3 parking spaces is located in the cemetery. The building has a door with knob hardware and a garage bay door. There is a 1" to 1½" change in level surface at the doorway threshold. There is no designated accessible parking.

Recommended Actions:

If there are certain areas of the cemeteries or gravestones that are unique or of special interest, then a brochure could be developed identifying these, inclusive of a photograph and narrative and made available at town hall or placed in an outdoor brochure holder at the respective cemetery entrance.

If the Central Cemetery employee building is made open to the public, including conducting town business out of the building, then modifications including creating designated accessible parking, replacing the door hardware with lever style hardware, and modifying the building threshold to eliminate the abrupt change in level surface will be required. If the building remains closed to the public, then modifications would only be required as a result of a reasonable accommodation request. No physical modifications to any of these cemeteries are required at the present time.

EAST MILLBURY PARK

Description of Facilities: East Millbury Park is a neighborhood park consisting of 2 baseball fields, 2 basketball courts, a playground area, swings, and a bench.



Responsible Party: Board of Selectmen, Department of Public Works

General Description or Obstacle Which Limits Mobility or Access: There is no designated accessible parking on site and no accessible route of travel to the baseball fields, player's seating, basketball courts, bench, swings, and other play components. There is no level area for a wheelchair at the bench.

If a portable toilet is provided, it must be "ADA compliant" and located on an accessible route of travel. See Chapter IX of this Plan for guidance.

East Millbury Park Accessibility Assessment

General Description of Obstacle	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
<u>Parking</u> There are no designated accessible parking spaces inclusive of access aisle and signage.	502 703.7.2	23	Stripe and designate at least one van accessible parking space and one passenger vehicle accessible parking space. The van accessible space s/b at a width of either 11' with a 5' access aisle or 8' wide parking space with an 8' access aisle (2010 ADA Standards). The passenger vehicle accessible space s/b 8' wide with a 5' access aisle. Signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located no more than 10' in front of the space. Van accessible signage s/b provided at the van accessible space. Slopes for the parking and access aisles should not exceed 2.0% in any direction.	1	2	I	Up to \$350+

<u>Accessible Route of Travel</u> There is no accessible route of travel to the ball fields, player's seating, bench, and basketball courts. See Photos East Millbury 1, 2, and 3.	403 221 802	22 14 19	An accessible route of travel needs to be provided to all areas available to the public. Construct an accessible route of travel fully to the ball fields, player's seating, bench, and basketball courts. Create an approach and level wheelchair area next to the bench. The space should be 36" wide x 60" deep per wheelchair. If a front/rear approach, the depth can be reduced to 48" as opposed to 60" for a side approach. The accessible route of travel must be compliant with width (48" per 521 CMR) and slope (2% max. cross, 5% max. running) requirements as well as changes in level surface (no > than ¼" unbeveled or between ¼" and ½" beveled w/a slope of no > 1:2). Construction options include compacted stone dust, asphalt or similar surfaces that meet the requirement of stable, firm, and slip resistant. Costs will vary depending on material used.	2	3	N	Up to \$25,000
<u>Playground Area</u> There is no accessible route of travel to and fully around the swings and play components. The ground surface is primarily grass and dirt. Grass and dirt are not acceptable as "fall zone" materials within a playground area. In addition, there are no accessible swings or play components. See Photo East Millbury 4.	402 303 403	19 20 22	An accessible route of travel needs to be provided to all areas available to the public. Construct an accessible route of travel fully to and around the swings and play components. The accessible route of travel must be compliant with width (48" per 521 CMR) and slope (2% max. cross, 5% max. running) requirements as well as changes in level surface (no > than ¼" unbeveled or between ¼" and ½" beveled w/a slope of no > 1:2). Play area ground surfaces immediately around play components and swings and in the fall zone must comply with ASTM F 1951 and ASTM F 1292. At a minimum, an accessible swing s/b provided.	2	3	N	Up to \$7,500+

Total up to \$32,850+

East Millbury Park Accessibility Assessment Photos



Photo East Millbury 1



Photo East Millbury 2



Photo East Millbury 3



Photo East Millbury 4

WEST MILLBURY PARK (a.k.a. Vincent D. Jacques Memorial Park)

Description of Facilities: West Millbury Park is a neighborhood park consisting of a baseball field, player's seating, 2 benches, and 2 ground play components.



Responsible Party: Board of Selectmen, Department of Public Works

General Description or Obstacle Which Limits Mobility or Access: There is no designated accessible parking on site and no accessible route of travel to the baseball field, player's seating, benches, and play equipment. There is no level area for a wheelchair at the benches.

If a portable toilet is provided, it must be "ADA compliant" and located on an accessible route of travel. See Chapter IX of this Plan for guidance.

West Millbury Park Accessibility Assessment

General Description of Obstacle	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
<u>Parking</u> There are no designated accessible parking spaces inclusive of access aisle and signage. See Photo West Millbury 1.	502 703.7.2	23	Stripe and designate at least one van accessible parking space and one passenger vehicle accessible parking space. The van accessible space s/b at a width of either 11' with a 5' access aisle or 8' wide parking space with an 8' access aisle (2010 ADA Standards). The passenger vehicle accessible space s/b 8' wide with a 5' access aisle. Signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located no more than 10' in front of the space. Van accessible signage s/b provided at the van accessible space. Slopes for the parking and access aisles should not exceed 2.0% in any direction.	1	2	I	Up to \$350+

Accessible Route of Travel There is no accessible route of travel to the ball field, player's seating, benches, and ground play components. See Photos West Millbury 2, 3, and 4.	403	22	An accessible route of travel needs to be provided to all areas available to the public. Construct an accessible route of travel fully to the ball fields, player's seating, benches, and ground play components. Create an approach and level wheelchair area next to the benches. The space should be 36" wide x 60" deep per wheelchair. If a front/rear approach, the depth can be reduced to 48" as opposed to 60" for a side approach. The accessible route of travel must be compliant with width (48" per 521 CMR) and slope (2% max. cross, 5% max. running) requirements as well as changes in level surface (no > than ¼" unbeveled or between ¼" and ½" beveled w/a slope of no > 1:2). Construction options include compacted stone dust, asphalt or similar surfaces that meet the requirement of stable, firm, and slip resistant. Costs will vary depending on material used.	2	3	N	Up to \$12,500+
	221	14					
	802	19					

Total up to \$12,850+

West Millbury Park Accessibility Assessment Photos



Photo West Millbury 1



Photo West Millbury 2



Photo West Millbury 3



Photo West Millbury 4

BUTLER FARM

Description of Facilities: Butler Farm consists of a community garden and dog park. On-site amenities include a pavilion, benches, and dog apparatus and agility equipment.



Responsible Party: Board of Selectmen

General Description or Obstacle Which Limits Mobility or Access: The designated accessible parking has signage that is too low, lacks striping, lacks access aisles, and has excessive cross slopes of up to 3.7%. There is no accessible route of travel to and around the dog park and to its various amenities. There are no level areas next to the benches in the dog park. The approximately 7 chain link gates are not smooth at the base on the push side of the gates. There is no accessible route of travel to the community garden.

If a portable toilet is provided, it must be “ADA compliant” and located on an accessible route of travel. See Chapter IX of this Plan for guidance.

Recommended Action:

As this site provides a service to Millbury (and Sutton) residents, modifications should be made to accommodate those with mobility limiting disabilities. This would include the construction of compliant accessible parking, the creation of an accessible route of travel (at least 48” wide; 2.0% max. cross slope; 5.0% max. running slope; firm, stable, slip resistant surface) to the community gardens and to, around, and within the dog park area. Benches must have a level area for a wheelchair. Chain link gates must have a smooth surface at the base. Stairs must have railings.

It is also recommended that raised bed gardens be constructed within the 2010 ADA reach range standards for gardening ease of use for a wheelchair user at or near the front row of gardens. Raised

garden beds are often constructed via volunteer effort and/or as a local youth scouting or 4-H project. See [Photos Butler Farm 1 and 2](#) for representative examples of accessible raised garden beds.

Butler Farm Accessibility Assessment

General Description of Obstacle	2010 ADAAG	MAAB 521 CMR	Type of Action to be Taken	P	F	TF	Cost Estimate
Parking The designated accessible parking has signage that is 7" to 10" too low, lacks striping, lacks access aisles, and has excessive cross slopes of up to 3.7%. See Photo Butler Farm 3.	502 703.7.2	23	Repave, stripe and designate at least one van accessible parking space and one passenger vehicle accessible parking space. The van accessible space s/b at a width of either 11' with a 5' access aisle or 8' wide parking space with an 8' access aisle (2010 ADA Standards). The passenger vehicle accessible space s/b 8' wide with a 5' access aisle. Signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located no more than 10' in front of the space. Van accessible signage s/b provided at the van accessible space. Slopes for the parking and access aisles should not exceed 2.0% in any direction.	1	2	N	Up to \$3,500+
Accessible Route of Travel There is no accessible route of travel to the community garden, dog park, dog park pavilion, dog park benches, and related interior dog park amenities. There is no level wheelchair space next to the benches in the dog park. See Photos Butler Farm 4, 5, 6, and 7.	403 221 802	22 14 19	An accessible route of travel needs to be provided to all areas available to the public. Construct an accessible route of travel fully to and around the community garden, dog park, and the internal amenities. Create an approach and level wheelchair area next to the benches in the dog park. The space should be 36" wide x 60" deep per wheelchair. If a front/rear approach, the depth can be reduced to 48" as opposed to 60" for a side approach. The accessible route of travel must be compliant with width (48" per 521 CMR) and slope (2% max. cross, 5% max. running) requirements as well as changes in level surface (no > than ¼" unbeveled or between ¼" and ½" beveled w/a slope of no > 1:2). Construction options include compacted stone dust, asphalt or similar surfaces that meet the requirement of stable, firm, and slip resistant. Costs will vary depending on material used.	2	3	N	TBD-up to \$100K+
Gates The gates to the dog park (7) do not comply with the 2010 ADA Standards for a smooth surface within 10 inches of the ground on the push side for the full width of the gate. See Photo Butler Farm 8.	404.2.10	NA	Install smooth plating or a covering at the base of the gates.	2	2	N	Up to \$1,500

Total up to \$105,000+

Butler Farm Accessibility Assessment Photos



Photo Butler Farm 1



Photo Butler Farm 2



Photo Butler Farm 3



Photo Butler Farm 4



Photo Butler Farm 5



Photo Butler Farm 6



Photo Butler Farm 7



Photo Butler Farm 8

UPPER AND LOWER TOWN COMMON

Description of Facilities: The Upper and Lower Town Common areas are small open and green spaces located at the intersection of Elm and Main Streets. Amenities include benches, picnic tables, trash receptacles, interpretive signage, and various plantings.



Responsible Party: Board of Selectmen, Department of Public Works

General Description or Obstacle Which Limits Mobility or Access:

The trash receptacle next to a bench in the Upper Town Common restricts the level area for a wheel chair. It is recommended that the trash receptacle be relocated.



WASHINGTON STREET PARK

Description of Facilities: Washington Street Park is a town-wide recreational complex consisting of a baseball field, a batting cage, 2 basketball courts, a playground area with 2 play scapes (Woolie World), 9 swings, 4 picnic tables, a portable accessible toilet, 2 separate parking areas, and a building which houses an apparent former concession stand (now used for storage), bathrooms, and a 2nd level broadcast booth.



Responsible Party: Board of Selectmen, Department of Public Works

General Description or Obstacle Which Limits Mobility or Access:

Parking near Baseball Field

Based on the number of parking spaces, an additional accessible parking space is required. The existing 2 spaces lack signage. The spaces and access aisles have running slopes that vary from 2.7% to 3.8%.

Parking near "Woolie World"

Although the 2 spaces and access aisles are compliant, it is recommended that "No Parking" signs be placed in the striped access aisle to prevent individuals from parking in those areas and restricting the use of van side ramps.

Broadcast Booth Building with Bathrooms and Concession Stand

There is no tactile designation signage to the ground level broadcast booth/concession door. There is no accessible route of travel to the 2nd level broadcast booth. There is an 8" abrupt change in level surface to access the concession stand/storage area and the stairs to the broadcast booth. Light and

scoreboard switches are 2" to 8" too high. Stairs to the 2nd level have risers that are 1" too high; abrupt nosings; and a railing on one side only that is ¼" too wide, not round or oval in shape, does not fully extend to the bottom of the stairs, and lacks top and bottom extensions. The concession stand counter is 42" a.f.f., which is 8" too high.

The Men's and Women's Bathrooms lack tactile designation signage and have an 8" abrupt change in level surface to access the interiors. The Women's Bathroom has a locking mechanism that requires pinching and use of the fingers; dispensers, a coat hook, and a mirror that are too high; a toilet paper dispenser that is too close to the front of the water closet; a sink with piping that is not wrapped or insulated and has a bowl that is too deep; and a water closet that has the flush control on the wrong side and lacks compliant near side, far side, and front clear width. The water closet lacks grab bars. The Men's Bathroom has a locking mechanism that requires pinching and use of the fingers; soap and towel dispensers that are too high; a sink with piping that is not wrapped or insulated and has a bowl that is too deep; and a water closet that lacks compliant far side and front clear width. The water closet lacks grab bars.

Accessible Route of Travel and Other Amenities

There is no accessible route of travel fully around the playground area (Woolie World), ground components, swings, benches (2), and picnic tables (4). Shredded rubber is the sole surface treatment around the Woolie World playscape. The route of travel to the accessible swing is loose stone and shredded rubber. The 7.5 foot long concrete ramp to the playscape has a running slope that varies from 6.4% to 6.6%. There is also a ¾" abrupt change in level surface at the transition from concrete to the playscape.

The picnic tables have only 10" of knee depth. There are no level areas for a wheelchair at the benches.

The chain link gate to the basketball court is not smooth at the base on the push side.

There is no accessible route of travel to the baseball field, dugouts, and batting cage from the parking area. The surface treatment of the walkway from the parking to the "home" dugout and baseball field is non-compliant loose stone. There are 2" to 4" abrupt changes in level surface to enter the dugouts. The chain link gates to the field (2) and batting cage (1) are not smooth at the base on the push side.

Woolie World Playscape

The first segment of the playscape ramp has running slopes that vary from 12.2% to 12.4%. The second segment of the ramp has running slopes that vary up to 7.0%.

Portable Accessible Toilet near Basketball Courts

The portable "accessible" toilet is not ADA compliant as the door closing speed is only 2 seconds; the locking mechanism is difficult to use with a closed fist due to the location of the interior pull device; the soap dispenser is 9½" too high and located over the grab bars; the towel dispenser is 12½" too high and located over the grab bars; the water closet is 2" too close to the near wall and has only 32" of clearance in front of the toilet; and the side and rear grab bars are both ½" too low.

Washington Street Park Accessibility Assessment

General Description of Obstacle	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
Parking <u>Parking near Baseball Field</u> Based on the number of parking spaces, an additional accessible parking space is required. The existing 2 spaces lack signage. The spaces and access aisles have running slopes that vary from 2.7% to 3.8%. <u>Parking near "Woolie World"</u> Although the 2 spaces and access aisles are compliant, it is recommended that "No Parking" signs be placed in the striped access aisle to prevent individuals from parking in those areas and restricting the use of van side ramps. See Photos Washington 1 and 2.	208.2 502.6 703.7.2 502.4	23.2 23.6 23.4	Stripe and designate at least one additional accessible parking space and access aisle. The existing spaces and access aisles should be reconstructed and/or resurfaced such that the slopes do not exceed 2.0% in any direction. Provide signage at each space. Signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located no more than 10' in front of the space. Van accessible signage s/b provided at the van accessible spaces. No parking signage s/b installed at the access aisles for the accessible spaces near Woolies World.	1	2,3	I	Up to \$4,500
Broadcast Booth Building and Concession There is no tactile designation signage to the ground level broadcast booth/concession door. There is an 8" abrupt change in level surface to access the concession stand/storage area and the stairs to the broadcast booth. Light and scoreboard switches are 2" to 8" too high. The concession stand counter is 42" a.f.f., which is 8" too high. There is no accessible route of travel to the 2 nd level broadcast booth.	703 404.2.5 308 904.5 403 206	41 26.10 39 17.6.2 20 14	Install accessible compliant signage on the latch side of each door with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Under 521 CMR, signage s/b 60" a.f.f to the centerline of the sign. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards). Install a ramp in accordance with Sections 405 and 505 of the 2010 ADA Standards and Section 24 of 521 CMR. Lower the switches to a height of no more than 48" a.f.f. If the concession counter is put into service, install an additional counter below the existing counter at a height of no more than 34" a.f.f. and at least 36" long. Although the 2010 ADA Standards do allow for an "exception" requiring an accessible route to press boxes/broadcast booths that are free-standing, above grade no more than 12 feet, and less than 500 sq. ft. in size; 521 CMR does not. The town may consider the following options: <i>Option 1: Discontinue use of the broadcast booth.</i> <i>Option 2: Seek a variance from the MAAB to not require the provision of an accesible route to the broadcast booth.</i>	2 2 2 2 2	2 3 3 2 3,4	I L L N L	\$50 Up to \$15,000 \$350 \$150 TBD

			<i>Option 3: Install a lift or limited use limited access elevator to the broad cast booth.</i>				
Stairs to the 2 nd level have risers that are 1" too high; abrupt nosings; and a railing on one side only that is ¼" too wide, not round or oval in shape, does not fully extend to the bottom of the stairs, and lacks top and bottom extensions. See Photos Washington 3, 4, and 5.	504.2 504.5 505	27.2 27.3 27.4	Modify the stairs and risers so the risers do not exceed 7" in height and the stair treads have curved or beveled nosings. Replace the existing railing with paired railings on both sides of the stairs. The railings s/b between 34" – 38" a.f.f. to the top of the railing, circular or oval in x-section, 1¼" – 2" in outside diameter, and with extensions at the top (12" parallel to the ground) and bottom (slope distance one tread then 12" parallel to the ground).	2	3	L	Up to \$6,000
Broadcast Booth Building Bathrooms Men's and Women's Both Both the Men's and Women's Bathrooms lack tactile designation signage and have an 8" abrupt change in level surface to access the interiors.	703	41	Install accessible compliant signage on the latch side of each door with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Under 521 CMR, signage s/b 60" a.f.f. to the centerline of the sign. Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	3	2	I	\$100
	404.2.5	26.10	Install a ramp in accordance with Sections 405 and 505 of the 2010 ADA Standards and Section 24 of 521 CMR.	3	3	N	Up to \$15,000
Locking mechanisms require pinching and use of the fingers.	309.4	39.5	Replace the locking mechanisms with ones that can be operable with a closed fist or loose grip.	3	2	I	\$100
Soap and towel dispensers are too high.	308	30.12	Lower the dispensers to a height of no more than 42" a.f.f.	3	2	I	\$0
Sink piping is not wrapped or insulated and the sink bowl is 1¼" too deep.	NA	30.9.4	Replace the sinks with ones that have bowls that are no deeper than 6½". Wrap or insulate the piping.	3	3	N	\$1,500
The water closets are 11" too close to the near wall and have only 29½" clear width in front of the toilets.	604.2 604.3	30.7.2	Relocate the water closets and/or reconfigure the bathrooms such that the water closets are 18" o.c. from the near wall, at least 42" o.c. from the far wall, and have at least 42" clearance in front of the toilets.	3	3	N	\$8,500
The water closets lack grab bars.	609 604	30.8	Install 42" long grab bars at a height of 33" to 36" a.f.f. to the top of the gripping surface. The rear grab bar s/b no more than 6" from the interior corner and the side grab bar no more than 12" from the interior corner.	3	2	N	\$750
Women's Only The toilet paper dispenser is 4" too close to the front of the water closet.	604.7	30.7.6	Relocate the toilet paper dispensers so they are a minimum of 7" and a maximum of 9" in front of the water closet measured to the centerline of the dispenser and at least 24" a.f.f.	3	2	I	\$0
The mirror is 16" too high.	603.3	30.11	Lower the mirror to a height of no more than 40" a.f.f. to top of the reflecting surface.	3	2	I	\$0
The coat hook is 21" too high.	308	30.6 6.5 6.6	Lower the coat hook to a height of no more than 48" a.f.f.	3	2	I	\$0

<p>The flush control of the water closet is on the wrong side.</p> <p>See Photos Washington 6 and 7.</p>	604.6	30.7.5	<p>Replace the water tank or the water closet in entirety such that the flush control is on the wide or approach side.</p> <p><i>Note: It may be necessary to engage in a design professional to determine the best way to achieve compliance including clear widths and turning radius requirements. This may require internal demolition and/or building addition. An alternative would be to close the bathrooms to the public and place out of service in entirety and use portable regular and accessible toilets at the baseball field.</i></p>	3	2	N	\$500
<p><u>Accessible Route of Travel and Other Amenities</u></p> <p>There is no accessible of travel fully around the playground area (Woolie World), ground components, swings, benches (2), and picnic tables (4). Shredded rubber is the sole surface treatment around the Woolie World playscape. The route of travel to the accessible swing is loose stone and shredded rubber.</p> <p>The 7.5 foot long concrete ramp to the playscape has a running slope that varies from 6.4% to 6.6%.</p> <p>There is also a ¾" abrupt change in level surface at the transition from concrete to the playscape.</p> <p>There are no level areas for a wheelchair at the benches.</p> <p>There is no accessible route of travel to the baseball field, dugouts, and batting cage from the parking area. The surface treatment of the walkway from the parking to the "home" dugout and baseball field is non-compliant loose stone. There are 2" to 4" abrupt changes in level surface to enter the dugouts.</p> <p>The picnic tables have only 10" of knee depth.</p> <p>The chain link gates to the basketball court (1), baseball field (2) and batting cage (1) do not comply with the 2010 ADA Standards for a smooth surface within 10 inches of the ground on the push side for the full width of the gate.</p> <p>See Photos Washington 8, 9, 10, 11, 12, and 13.</p>	<p>402</p> <p>303</p> <p>403</p> <p>1008</p> <p>802.1</p> <p>221.2</p> <p>226.1</p> <p>902</p> <p>404.2.10</p>	<p>19</p> <p>20</p> <p>22</p> <p>14</p>	<p>Construct an accessible route of travel to and around the playground, ground components, swings, benches, picnic tables, baseball field, dugouts, and batting cage. This will require replacement of the concrete ramp to Woolie World such that the running slope does not exceed 5.0%. It will also require modifications to the baseball dugout entrances. In addition, there must be an accessible route within the playground area connecting play components as the shredded rubber does not comply with the requirements for an accessible route of travel.</p> <p>The accessible route of travel must be compliant with width (48" per 521 CMR) and slope (2% max. cross, 5% max. running) requirements as well as changes in level surface (no > than ¼" unbeveled or between ¼" and ½" beveled w/a slope of no > 1:2). Create an approach and level wheelchair area next to the benches. The space should be 36" wide x 60" deep per wheelchair. If a front/rear approach, the depth can be reduced to 48" as opposed to 60" for a side approach. Construction options include compacted stone dust, asphalt or similar surfaces that meet the requirement of stable, firm, and slip resistant. Costs will vary depending on material used.</p> <p>Provide an additional picnic table which provides the required 27" knee height, 30" clear width, and 19" knee depth and locate on an accessible route of travel.</p> <p>Install smooth plating or at the base of the gate.</p>	2	3	N	Up to \$35,000+
<p><u>Woolie World Playscape</u></p> <p>The first segment of the playscape ramp has running slopes that vary from 12.2% to 12.4%. The second segment of the ramp has running slopes that</p>	1008	NA	<p>Under the 2010 ADA Standards, playscape ramps cannot exceed a running slope of 6.25%. Modify the playscape ramps to achieve the maximum slope of 6.25%.</p>	2	3	N	TBD

vary up to 7.0%.			<i>Note: Play area ground surfaces immediately around play components and in the fall zone must comply with ASTM F 1951 and ASTM F 1292. Depending on the type, age, and quality of materials (woodchips, shredded wood fiber, rubberized shavings), they may be considered acceptable as a fall zone ground surface.</i>				
<u>Portable Accessible Toilet near Basketball Courts</u> The portable “accessible” toilet is not ADA compliant as the door closing speed is only 2 seconds; the locking mechanism is difficult to use with a closed fist due to the location of the interior pull device; the soap dispenser is 9½” too high and located over the grab bars; the towel dispenser is 12½” too high and located over the grab bars; the water closet is 2” too close to the near wall and has only 32” of clearance in front of the toilet; and the side and rear grab bars are both ½” too low. See Photo Washington 14.	404.2.8 308 604.7 604.2 604.3 609.4	26.9 30.12 30.8.5 30.7.6 30.7.2 30.8.2	Replace the existing portable “accessible” toilet with an ADA Compliant toilet such that the soap and towel dispensers are no more than 42” a.f.f. and not located over the grab bars; the water closet s/b 18” from the nearest sidewall, at least 42” from the farthest sidewall, and 42” from the front of the water closet to the nearest wall or fixture; the grab bars s/b 33” to 36” a.f.f. to the top of the gripping surface; and a door closing speed that is at least 6 seconds. The interior pull device s/b relocated such that it does not interfere with the locking mechanism.	3	2	I	TBD

Total up to \$87,500+

Washington Street Park Accessibility Assessment Photos



Photo Washington 1



Photo Washington 2



Photo Washington 3



Photo Washington 4

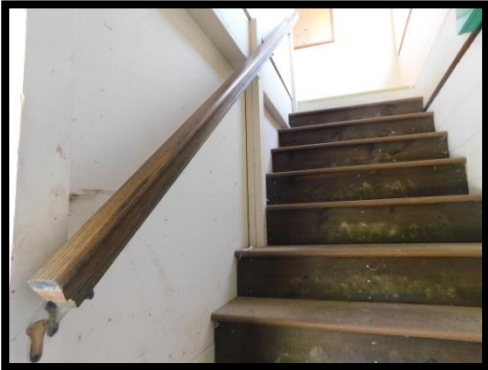


Photo Washington 5



Photo Washington 6



Photo Washington 7



Photo Washington 8



Photo Washington 9

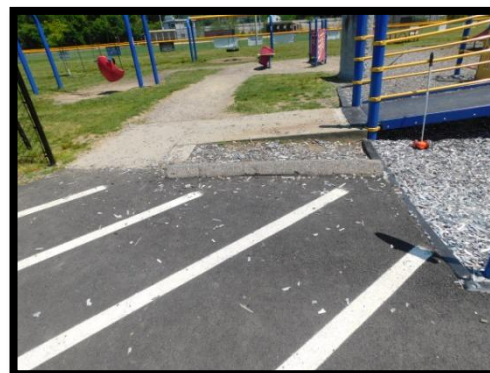


Photo Washington 10



Photo Washington 11



Photo Washington 12



Photo Washington 13



Photo Washington 14

GREENWOOD STREET PARK

Description of Facilities: Greenwood Street Park is a larger recreational facility consisting of 1 baseball field, 2 soccer fields, 1 basketball court, 2 ground play components, a bench, 2 separate parking areas, and a portable accessible toilet.



Responsible Party: Board of Selectmen, Department of Public Works

General Description or Obstacle Which Limits Mobility or Access: There is no designated accessible parking at either of the parking lots. There is no accessible route of travel to the baseball field and player's seating, soccer fields, basketball court, bench, and ground play components. There is no level area for a wheelchair at the bench. The portable accessible toilet is not "ADA compliant".

Greenwood Street Park Accessibility Assessment

General Description of Obstacle	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
<u>Parking</u> There are no designated accessible parking spaces inclusive of access aisle and signage at either of the 2 separate parking areas.	502 703.7.2	23	Stripe and designate at least one van accessible parking space and one passenger vehicle accessible parking space in each parking area. The van accessible space s/b at a width of either 11' with a 5' access aisle or 8' wide parking space with an 8' access aisle (2010 ADA Standards). The passenger vehicle accessible space s/b 8' wide with a 5' access aisle. Signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located no more than 10' in front of the space. Van accessible signage s/b provided at the van accessible space. Slopes for the parking and access aisles should not exceed 2.0% in any direction.	1	2	I	Up to \$750+

<p><u>Accessible Route of Travel</u></p> <p>There is no accessible route of travel to the baseball field and player's seating, soccer fields, basketball court, bench, and ground play components. There is no level area for a wheelchair at the bench.</p> <p>See Photos Greenwood 1, 2, and 3.</p>	<p>403 221 802</p>	<p>22 14 19</p>	<p>An accessible route of travel needs to be provided to all areas available to the public. Construct an accessible route of travel fully to the ball fields, player's seating, bench, play components, and basketball court. Create an approach and level wheelchair area next to the bench. The space should be 36" wide x 60" deep per wheelchair. If a front/rear approach, the depth can be reduced to 48" as opposed to 60" for a side approach.</p> <p>The accessible route of travel must be compliant with width (48" per 521 CMR) and slope (2% max. cross, 5% max. running) requirements as well as changes in level surface (no > than ¼" unbeveled or between ¼" and ½" beveled w/a slope of no > 1:2). Construction options include compacted stone dust, asphalt or similar surfaces that meet the requirement of stable, firm, and slip resistant. Costs will vary depending on material used.</p>	<p>2</p>	<p>3</p>	<p>N</p>	<p>TBD - Up to \$36,000</p>
<p><u>Portable Accessible Toilet</u></p> <p>The portable "accessible" toilet is not ADA compliant as the door closing speed is only 2 seconds; the soap dispenser is 10" too high and located over the grab bars; the toilet paper dispenser is too high and located over the grab bars; the water closet is 2" too close to the near wall and has only 32" of clearance in front of the toilet; and the side and rear grab bars are both ½" too low.</p> <p>See Photo Greenwood 4.</p>	<p>404.2.8 308 604.7 604.2 604.3 609.4</p>	<p>26.9 30.12 30.8.5 30.7.6 30.7.2 30.8.2</p>	<p>Replace the existing portable "accessible" toilet with an ADA Compliant toilet such that the soap dispenser is no more than 42" a.f.f. and not located over the grab bars; the toilet paper dispenser s/b a minimum of 24" a.f.f. and s/b 7" min. to 9" max. in front of the water closet measured to the centerline of the dispenser and not located over the grab bars; the water closet s/b 18" from the nearest sidewall, at least 42" from the farthest sidewall, and 42" from the front of the water closet to the nearest wall or fixture; the grab bars s/b 33" to 36" a.f.f. to the top of the gripping surface; and a door closing speed that is at least 6 seconds.</p>	<p>3</p>	<p>2</p>	<p>I</p>	<p>TBD</p>

Total up to \$36,750+

Greenwood Street Park Accessibility Assessment Photos



Photo Greenwood 1



Photo Greenwood 2



Photo Greenwood 3

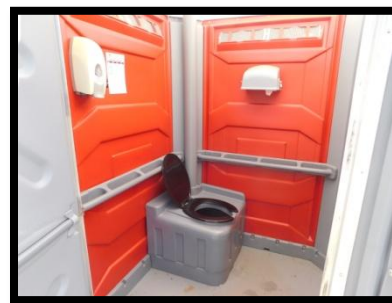
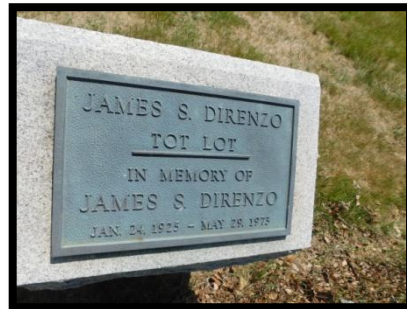


Photo Greenwood 4

JAMES DIRENZO PLAYGROUND

Description of Facilities: James Direnzo Playground is a small neighborhood playground consisting of a basketball court, 2 ground play components, 2 swings, and 1 slide. There is no on-site parking.



Responsible Party: Board of Selectmen, Department of Public Works

General Description or Obstacle Which Limits Mobility or Access: There is no accessible route of travel to the basketball court, 2 ground play components, 2 swings, and 1 slide. Consideration should be given to replacing one of the swings with an accessible swing.

James Direnzo Park Accessibility Assessment

General Description of Obstacle	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
<u>Accessible Route of Travel</u> There is no accessible route of travel to the basketball court, ground play components, swings and slide.	403 221 802	22 14 19	An accessible route of travel needs to be provided to all areas available to the public. Construct an accessible route of travel to the basketball court, ground play components, swings, and slide. The accessible route of travel must be compliant with width (48" per 521 CMR) and slope (2% max. cross, 5% max. running) requirements as well as changes in level surface (no > than ¼" unbeveled or between ¼" and ½" beveled w/a slope of no > 1:2). Construction options include compacted stone dust, asphalt or similar surfaces that meet the requirement of stable, firm, and slip resistant. Costs will vary depending on material used.	2	3	N	TBD – up to \$4,000+

Total up to \$4,000+

WINDLE FIELD

Description of Facilities: A downtown recreational complex consisting of 2 baseball fields, bleachers, bathrooms, parking, a concession stand, and a picnic table. There are also apparent former basketball courts and tennis courts which are no longer in service.



Responsible Party: Board of Selectmen, School Department

General Description or Obstacle Which Limits Mobility or Access: The parking near the bathrooms on the "1st base side" lacks signage. The parking near the bathrooms on the "3rd base side" lacks signage and has only a 5' access aisle. The accessible route from the 1st base parking to the bathrooms has an asphalt ramp with up to a 12.0% running slope and up to a 1" abrupt change in level surface at the transition from asphalt to concrete.

There is no accessible route of travel to the baseball fields, player's seating, bleachers, and picnic table. There is no level area for a wheelchair at the bleachers. The wooden ramp from the concession stand to the field area has a running slope of 7.2%. The concrete walkway at the bathrooms is heaving with abrupt changes in level surface.

The picnic table has only 12" of knee depth.

The concession counter is 39½" a.f.f., which is 5½" too high. The door to the concession stand has knob hardware and lacks tactile designation signage.

The chain link gates (2) to the player's benches are not smooth at the base on the push side. The gate latches are 1" to 5" too high.

There is a 1½" abrupt change in level surface at the bathroom building entrance. Both the Men's and Women's bathrooms lack tactile designation signage. The doors also have non-compliant knob-style hardware. The bathroom sinks have plumbing that is not wrapped or insulated and metered faucets

that stay open for only 3 seconds. The mirrors are up to 4¼” too high. Both the side and rear grab bars are only 36” long. The Men’s stall door is not fully self-closing. The Men’s water closet is 2” too far from the near wall and is 20½” too close to the stall partition in front of the toilet. In addition, the flush control is on the wrong side. The Women’s water closet has only 22½” front clear width.

Windle Field Accessibility Assessment

General Description of Obstacle	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
<u>Parking</u> The parking near the bathrooms on the “1 st base side” lacks signage. The parking near the bathrooms on the “3 rd base side” lacks signage and has only a 5’ access aisle. The accessible route from the 1 st base parking to the bathrooms has an asphalt ramp with up to a 12.0% running slope and up to a 1” abrupt change in level surface at the transition from asphalt to concrete. <i>See Photos Windle 1 and 2.</i>	502 703.7.2 403	23 22	Install signage. Signage must be set such that the signage height should be a minimum of 60” high at the bottom (2010 ADAAG Standards) and a maximum of 96” at the top (MAAB 521 CMR) and located no more than 10’ in front of the space. Restripe the parking on the “3 rd base side” so that the access aisle is 8’ wide for a van. Van accessible signage s/b provided at the van accessible spaces. Reconstruct the asphalt ramp so it has a running slope of no more than 5.0% and changes in level surface of no more than ¼”.	1 1	2 2	I I	\$125 \$250
<u>Accessible Route of Travel</u> There is no accessible route of travel to the baseball fields, player’s seating, bleachers, and picnic table. There is no level area for a wheelchair at the bleachers. The wooden ramp from the concession stand to the field area has a running slope of 7.2%. The concrete walkway at the bathrooms is heaving with abrupt changes in level surface. <i>See Photos Windle 3 and 4.</i>	403 221 802	22 14 19	An accessible route of travel needs to be provided to all areas available to the public. Construct an accessible route of travel fully to the ball fields, player’s seating, bleachers, and picnic table. Create an approach and level wheelchair area next to the bleachers. The space should be 36” wide x 60” deep per wheelchair. If a front/rear approach, the depth can be reduced to 48” as opposed to 60” for a side approach. The accessible route of travel must be compliant with width (48” per 521 CMR) and slope (2% max. cross, 5% max. running) requirements as well as changes in level surface (no > than ¼” unbeveled or between ¼” and ½” beveled w/a slope of no > 1:2). Construction options include compacted stone dust, asphalt or similar surfaces that meet the requirement of stable, firm, and slip resistant. Costs will vary depending on material used. Reconstruct the wooden ramp so that the running slope does not exceed 5.0%. Repair the concrete walkway by replacing heaving pads and grinding abrupt changes in level surface. <i>Note: If the former basketball and tennis courts are put back into service, an accessible route of travel will also needed to be provided to these areas.</i>	2	3	N	TBD - Up to \$30,000
<u>Picnic Table</u> The picnic table has only 12” of knee depth.	226.1 902	19	Provide an additional picnic table which provides the required 27” knee height, 30” clear width, and 19” knee depth and locate on an accessible route of travel.	2	2	I	\$750

<u>Concession Stand</u> The concession counter is 39½" a.f.f., which is 5½" too high. The door to the concession stand has knob hardware. There is no tactile designation signage at the door to the concession stand.	904.5	17.6.2	If the concession counter is put into service, install an additional counter below the existing counter at a height of no more than 34" a.f.f. and at least 36" long.	2	2	N	\$150
	404.2	26.11	Install lever style hardware that can be operated with a closed fist or loose grip.	2	2	I	\$100
	703	41.1	Install accessible compliant signage on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Under 521 CMR, signage s/b 60" a.f.f. to the centerline of the sign. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	2	2	I	\$50
<u>Chain Link Gates</u> The chain link gates to the players' benches (2) do not comply with the 2010 ADA Standards for a smooth surface within 10 inches of the ground on the push side for the full width of the gate. The gate latches are 1" to 5" too high.	404.2.10	NA	Install smooth plating or at the base of the gate.	2	2	N	Up to \$400
	404.2.7	26.11.2	Lower the latches to a height of no more than 48" a.f.f.	2	2	I	\$0
<u>Bathrooms</u> There is a 1½" abrupt change in level surface at the bathroom building entrance. <u>Men's and Women's Bathrooms</u> The bathrooms lack tactile designation signage. The doors also have non-compliant knob-style hardware. The bathroom sinks have plumbing that is not wrapped or insulated. Metered faucets stay open for only 3 seconds. The mirrors are up to 4¼" too high. Both the side and rear grab bars are only 36" long <u>Men's Only</u> The stall door is not fully self-closing.	403.4 404.2.5	22.4 26.10	Modify and/or grind the concrete to eliminate the abrupt change in level surface.	3	2	I	\$0
	703	41	Install accessible compliant signage on the latch side of each door with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Under 521 CMR, signage s/b 60" a.f.f. to the centerline of the sign. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards). Bathroom signage must include the Universal of Symbol of Accessibility.	3	2	I	\$100
	404.2	26.11	Install lever style hardware that can be operated with a closed fist or loose grip.	3	2	I	\$150
	606.5	30.9.5	Wrap or insulate the piping.	3	2	I	\$150
	606.4	30.9.6	Adjust the faucets so they stay open for at least 10 seconds.	3	2	I	\$0
	603.3	30.11	Lower the mirrors to a height of no more than 40" a.f.f. to the bottom of the reflecting surface.	3	2	I	\$0
	604 609	30.8	Replace the grab bars with ones that are 42" long.	3	2	I	\$600
	604.8.1	30.6.1	Adjust the hinge such that the door fully self closes.	3	2	I	\$0

The water closet is 2" too far from the near wall and is 20½" too close to the stall partition in front of the toilet.	604.2 604.3	30.7.2	"Pad out" the side wall to reduce the clearance to 18". Modify/reconstruct/reconfigure the partition wall to achieve the minimum required 42" front water closet clearance.	3	2	1	Up to \$500+
The flush control is on the wrong side.	604.6	30.7.5	Reverse the flush control.	3	3	1	\$350+
<u>Women's Only</u> The Women's water closet has only 22½" front clear width.	604.3	30.7.2	Modify/reconstruct/reconfigure the partition wall to achieve the minimum required 42" front water closet clearance.	3	2	1	Up to \$500+
See Photos Windle 5, 6, 7, 8, 9, and 10.							

Total up to \$34,175+

Windle Field Accessibility Assessment Photos



Photo Windle 1



Photo Windle 2



Photo Windle 3



Photo Windle 4



Photo Windle 5



Photo Windle 6



Photo Windle 7

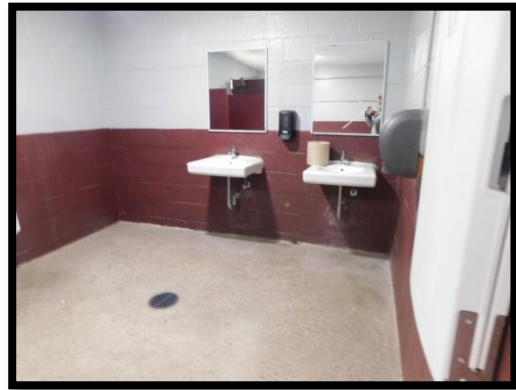


Photo Windle 8

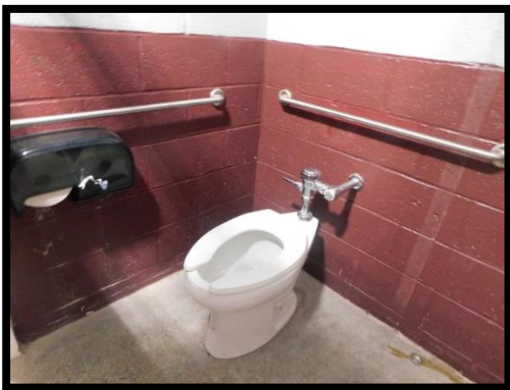


Photo Windle 9

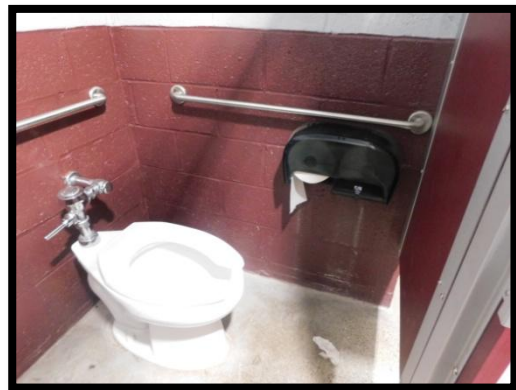
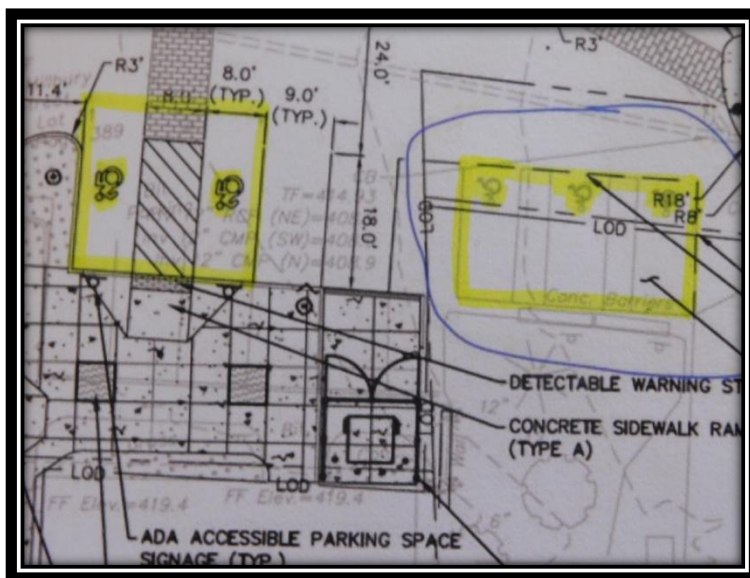


Photo Windle 10

DOWNTOWN MUNICIPAL PARKING LOT

Description of Facilities: Municipal parking lot for patrons and visitors of the downtown Main Street Area. The parking lot was under reconstruction at the time of assessment and individual striped spaces and access aisles with finish surfaces were not in place. The photo below represents the intended location and plan of the proposed 5 accessible parking spaces.

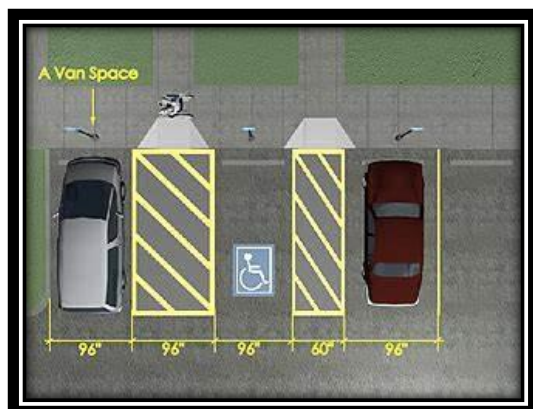


Responsible Party: Board of Selectmen, Department of Public Works.

Recommended Actions:

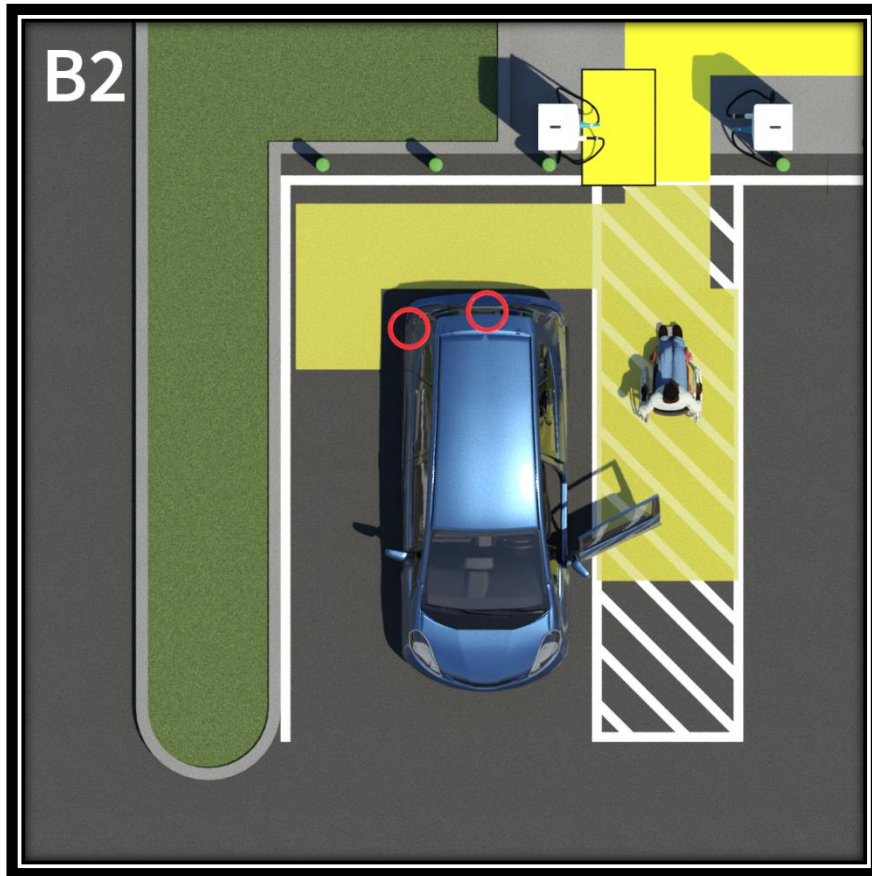
Parking

Designated accessible parking must adhere to Section 502 of the 2010 ADA Standards and Section 23 of 521 CMR. Van accessible spaces should be at a width of either 11' with a 5' access aisle or an 8' parking space with an 8' access aisle (2010 ADA Standards). Passenger vehicle accessible spaces should be 8' wide with a 5' access aisle. Signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located no more than 10' in front of the space. Van spaces should include "van accessible signage". The running and cross slopes of the parking spaces and access aisles should not exceed 2.0%. See Representative Photo below.



EV Charging Stations

If the town is installing EV charging stations in the parking lot, then consideration should be given to making 5% or at least one of the charging stations accessible. Guidance is provided in Chapter VI of this plan and includes recommendations on parking stall width, accessible route of travel, running and cross slopes, reach range, controls, and related considerations. See Representative Photo below.



RAYMOND E. SHAW ELEMENTARY SCHOOL PLAYGROUND AND FIELDS

Description of Facilities: The facility consists of parking, a bathroom and storage building, a multi-purpose field, bleachers, and a playground.



Responsible Party: Board of Selectmen, School Department

General Description or Obstacle Which Limits Mobility or Access: There is no designated accessible parking inclusive of signage at the bathrooms. *Note: At the time of assessment work was still in process completing some of the facility.* The bathroom and storage building lacks tactile designation signage. The right side bathroom door closes in 4 to 5 seconds. The right side bathroom soap dispenser is 1½" too high. The chain link gates to the field (4) are not smooth at the base on the push side. There is a roughly 5' segment of the concrete walkway at the base turn to the slides with a running slope of up to 5.6%.

Shaw Elementary School Playground and Fields Accessibility Assessment

General Description of Obstacle	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
Parking There is currently no designated accessible parking space inclusive of access aisle and signage at the bathroom/storage building. <i>See Photo Shaw 1.</i>	502 703.7.2	23	Stripe and designate at least one van accessible parking space. The van accessible space s/b at a width of either 11' with a 5' access aisle or 8' wide parking space with an 8' access aisle (2010 ADA Standards). Signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located no more than 10' in front of the space. Van accessible signage s/b provided at the van accessible space. Slopes for the parking and access aisles should not exceed 2.0% in any direction.	1	2	I	Up to \$100

Bathroom and Storage Building The bathroom and storage building lacks tactile designation signage. The right side bathroom door closes in 4 to 5 seconds. The right side bathroom soap dispenser is 1½" too high. See Photo Shaw 2.	703	41	Install accessible compliant tactile designation signage on the latch side of each door with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Under 521 CMR, signage s/b 60" a.f.f to the centerline of the sign. Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	2, 3	2	I	\$200
	404.2.8	26.9	Modify the door closer/hinge such that it takes at least 6 seconds to close.	2	2	I	\$0
	308	30.12	Lower the dispenser to a height of no more than 42" a.f.f. to the operating mechanism.	2	2	I	\$0
Chain Link Gates The chain link gates to the field (4) do not comply with the 2010 ADA Standards for a smooth surface within 10 inches of the ground on the push side for the full width of the gate. See Photo Shaw 3.	404.2.10	NA	Install smooth plating or at the base of the gate.	2	2	N	Up to \$400
Accessible Route of Travel There is a roughly 5' segment of the concrete walkway at the base turn to the slides with a running slope of up to 5.6%. See Photo Shaw 4.	403.3	22.3	Option #1: Seek a variance to retain the existing concrete pad that exceeds the maximum allowed slope of 5.0% for a walkway.	2	1	I	\$0
			Option #2: Replace the concrete pad and ensure that the running slope is no more than 5.0%.	2	3	I	Up to \$250

Total up to \$950

Shaw Elementary School Playground and Fields Accessibility Assessment



Photo Shaw 1



Photo Shaw 2



Photo Shaw 3



Photo Shaw 4

ELMWOOD STREET SCHOOL PLAYGROUND AND FIELDS

Description of Facilities: The Elmwood Street School playground and fields consist of a side playground, a rear playground, a baseball field with player's seating and bleachers, a batting cage, a soccer field, and a pavilion. In addition there are 3 picnic tables and a portable accessible toilet next to the back of the school building.



Responsible Party: Board of Selectmen, School Department

General Description or Obstacle Which Limits Mobility or Access:

Side Playground

The asphalt walkway to the side playground has some heaving and segments with running slopes of 5.2% to 5.4%. There is no accessible route of travel around the playground and to play components with the exception of rubberized matting to the accessible swing. The rubberized matting however is covered in woodchips rendering it inaccessible. The ground surface of the remainder of the playground area is woodchips. The accessible swing is the only accessible play component. None of the 4 benches are on an accessible route of travel and lack level areas for a wheelchair.

Playing Fields and Related Amenities

There is no accessible route of travel to the baseball field and player's seating, bleachers, batting cage, soccer field, and pavilion. There is no level area for a wheelchair at the bleachers. The chain link gates (2) to the player's seating is not smooth at the base on the push side.

Rear Playground

There is no accessible route of travel to and around the playground and to play components including adjacent swings. The only means of access is via stairs. The stair railings are 3" to 6" too low and lack top extensions. Wood chips are the sole surface treatment throughout the playground. An accessible swing is the only accessible play equipment.

Picnic Tables and Portable Accessible Toilet

The picnic tables (3) are not on an accessible route and have only 11" to 12" of knee depth.

The portable accessible toilet is not "ADA compliant".

Elmwood Street School Playground and Fields Accessibility Assessment

General Description of Obstacle	2010 ADAAG	MAAB 521 CMR	Type of Action to be Taken	P	F	TF	Cost Estimate
<u>Side Playground</u> <p>The asphalt walkway to the side playground has some heaving and segments with running slopes of 5.2% to 5.4%.</p> <p>There is no accessible route of travel around the playground and to play components with the exception of rubberized matting to the accessible swing. The rubberized matting however is covered in woodchips rendering it inaccessible. The ground surface of the remainder of the playground area is woodchips. The accessible swing is the only accessible play equipment.</p> <p>None of the 4 benches are on an accessible route of travel and lack level areas for a wheelchair.</p> <p>See Photos Elmwood 1, 2, and 3.</p>	402 303 403 1008 802.1 221.2	19 20 22 14	<p>An accessible route of travel needs to be provided to all areas available to the public. Due to the limited segments of the asphalt walkway that are in non-compliance, seek a variance to retain the existing walkway until full reconstruction is required due to normal "wear and tear".</p> <p>Construct an accessible route of travel around the playground, to the play components and to the benches. The accessible route of travel must be compliant with width (48" per 521 CMR) and slope (2% max. cross, 5% max. running) requirements as well as changes in level surface (no > than ¼" unbeveled or between ¼" and ½" beveled w/a slope of no > 1:2). Create an approach and level wheelchair area next to the benches. The space should be 36" wide x 60" deep per wheelchair. If a front/rear approach, the depth can be reduced to 48" as opposed to 60" for a side approach. Construction options include compacted stone dust, asphalt or similar surfaces that meet the requirement of stable, firm, and slip resistant. Costs will vary depending on material used.</p> <p>The rubberized matting to the accessible swing must be maintained such that is free of wood chips and other debris.</p> <p>"Fully accessible" playscape and ground components should be considered. Play area ground surfaces immediately around play components and in the fall zone must comply with ASTM F 1951 and ASTM F 1292. Depending on the type, age, and quality of woodchips, they may be considered acceptable as a fall zone ground surface.</p>	2	2,3	N	Up to \$25,000+
<u>Playing Fields and Related Amenities</u> <p>There is no accessible route of travel to the baseball field and player's seating,</p>	403 221	22 14	<p>An accessible route of travel needs to be provided to all areas available to the public. Construct an accessible</p>	2	3	N	TBD - Up to

bleachers, batting cage, soccer field, and pavilion. There is no level area for a wheelchair at the bleachers.	802	19	route of travel fully to the ball fields, player's seating, bleachers, batting cage, and pavilion. Create an approach and level wheelchair area next to the bleachers. The space should be 36" wide x 60" deep per wheelchair. If a front/rear approach, the depth can be reduced to 48" as opposed to 60" for a side approach.				\$25,000
The chain link gates (2) to the player's seating do not comply with the 2010 ADA Standards for a smooth surface within 10 inches of the ground on the push side for the full width of the gate. See Photos Elmwood 4 and 5.	404.2.10	NA	Install smooth plating or at the base of the gate.	2	2	N	Up to \$200
Rear Playground There is no accessible route of travel to and around the playground and to play components including adjacent swings.	403 221	22 14	Construct an accessible route of travel to and around the playground and to and around the adjacent swings. The accessible route of travel must be compliant with width (48" per 521 CMR) and slope (2% max. cross, 5% max. running) requirements as well as changes in level surface (no > than ¼" unbeveled or between ¼" and ½" beveled w/a slope of no > 1:2). Construction options include compacted stone dust, asphalt or similar surfaces that meet the requirement of stable, firm, and slip resistant. Costs will vary depending on material used.	2	3	N	Up to \$20,000
The only means of access is via stairs. The stair railings are 3" to 6" too low and lack top extensions.	206 505	20 27.4	Replace and/or modify the existing railings so they are 34" to 38" a.f.f. to the top of the gripping surface with 12" extensions at the top parallel to the ground.	2	2	I	Up to \$500
Wood chips are the sole surface treatment throughout the playground. An accessible swing is the only accessible play equipment. See Photos Elmwood 6, 7, and 8.	1008	19	"Fully accessible" playscape and ground components should be considered. Play area ground surfaces immediately around play components and in the fall zone must comply with ASTM F 1951 and ASTM F 1292. Depending on the type, age, and quality of woodchips, they may be considered acceptable as a fall zone ground surface.	2	3	N	TBD
Picnic Table The picnic tables (3) are not on an accessible route and have only 11" to 12" of knee depth.	226.1 902 403	19 22	Provide an additional picnic table which provides the required 27" knee height, 30" clear width, and 19" knee depth and locate on an accessible route of travel.	2	2	I	\$750
Portable Accessible Toilet The portable "accessible" toilet is not ADA compliant as the door closing speed is only 2 seconds; the soap dispenser is 10" too high and located over the grab bars; the towel dispenser is 13" too high and located over the grab bars; the water closet is 2" too close to the near wall and has only 32" of clearance in front of the toilet; and the side and rear grab bars are both ¼" too low.	404.2.8 308 604.7 604.2 604.3 609.4 403	26.9 30.12 30.8.5 30.7.6 30.7.2 30.8.2 22	Replace the existing portable "accessible" toilet with an ADA Compliant toilet such that the soap and towel dispensers are no more than 42" a.f.f. and not located over the grab bars; the water closet s/b 18" from the nearest sidewall, at least 42" from the farthest sidewall, and 42" from the front of the water closet to the nearest wall or fixture; the grab bars s/b 33" to 36" a.f.f. to the top of the gripping surface; and a door closing speed that is at least 6 seconds. The portable accessible toilet must be on an accessible route of travel.	3	2	I	TBD

Total up to \$71,450+

Elmwood Street School Playground and Fields Accessibility Assessment Photos



Photo Elmwood 1



Photo Elmwood 2



Photo Elmwood 3



Photo Elmwood 4



Photo Elmwood 5



Photo Elmwood 6



Photo Elmwood 7



Photo Elmwood 8

ALUMNI FIELD

Description of Facilities: Alumni Field consists of parking, a multi-purpose field with a track, a softball field, bleacher seating with ramped access, a broadcast booth with chairlift access, a concession stand, a pavilion, picnic tables, accessible bathrooms, and a portable accessible toilet for public use when the other accessible bathrooms are closed.



Responsible Party: School Department

General Description or Obstacle Which Limits Mobility or Access:

Parking

The van accessible spaces (2) lack van accessible signage.

Accessible Route of Travel

The accessible route of travel from the parking to Alumni Field has 3 segments of concrete near the entrance and bollards with running slopes of 6.8% to 8.4%. The cross slopes at the bollards vary up to 3.2%.

Picnic Tables

The picnic table near the track has only 11½" of knee depth and is not on an accessible route of travel. The 2 picnic tables near the concession stand have only 11½" of knee depth.

Chain Link Gates

The chain link gates (2) to the softball field are not smooth at the base.

Broadcast Booth

The glass pane in the door to the broadcast booth from the accessible route of travel (lift side) is 58¼" a.f.f., which is 15¼" too high.

Ramp to Bleachers

The lower ramp railings on both the lower and upper ramp segments vary from 20¼" to 20¾" a.f.f. to the top of the gripping surface.

Bathrooms (Men's, Women's, Unisex)

Men's, Women's and Unisex. The bathrooms have signage that is 4" to 5" too low. The doors have slightly excessive operating forces of 16 lbs. and closing speeds of 3 to 5 seconds. The sink piping is not wrapped.

Men's and Women's. The stall doors open in and not out.

Men's Only. The toilet paper dispenser is 1" too close to the front of the water closet.

Unisex Only. The entrance door locking mechanism is difficult to use with a closed fist or loose grip. The side and rear grab bars are ¼" to ½" too high.

Portable Accessible Toilet

The portable toilet is not on a level surface as the running slope is up to 3.5%. The door closes in 2 seconds. The soap and towel dispensers are 10" to 13" too high and located over the grab bars. The water closet is 1" too high, 2" too close to the rear wall, and 10" too close to the wall in front of the toilet.

Alumni Field Accessibility Assessment

General Description of Obstacle	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
<u>Parking</u> The van accessible spaces (2) lack van accessible signage.	502	23	Provide "van accessible" signage below the existing signage.	1	2	I	\$50
<u>Accessible Route of Travel</u> The accessible route of travel from the parking to Alumni Field has 3 segments of concrete near the entrance and bollards with running slopes of 6.8% to 8.4%. The cross slopes at the bollards vary up to 3.2%.	403	22	Modify/replace the concrete segments such that the running slope does not exceed 5.0% and the cross slope does not exceed 2.0%	1	3	I	TBD – up to \$2,500
<u>Picnic Tables</u> The picnic table near the track has only 11½" of knee depth and is not on an accessible route of travel. The 2 picnic tables near the concession stand have only 11½" of knee depth. See Photo Alumni 1.	226.1 902 403	19 22	Accessible picnic tables need to be provided at each separate location. Provide an additional picnic table at the track and at the concession stand which provide the required 27" knee height, 30" clear width, and 19" knee depth and locate on an accessible route of travel. The picnic tables must be on an accessible route of travel and on a stable and level surface.	2	2	I	\$1,500

<u>Chain Link Gates</u> The chain link gates (2) to the softball field do not comply with the 2010 ADA Standards for a smooth surface within 10 inches of the ground on the push side for the full width of the gate. See Photo Alumni 2.	404.2.10	NA	Install smooth plating or a protective covering at the base of the gates.	2	2	N	\$200
<u>Broadcast Booth</u> The glass pane in the door to the broadcast booth from the accessible route of travel (lift side) is 58 1/4" a.f.f., which is 15 1/4" too high. See Photo Alumni 3.	404.2.11	NA	Doors, gates, and side lights adjacent to doors or gates, containing panels that permit viewing through the panels shall have the bottom of at least one panel located 43 inches maximum a.f.f. Frost or block the glass pane.	2	2	N	\$0
<u>Ramp to Bleachers</u> The lower ramp railings on both the lower and upper ramp segments vary from 20 1/4" to 20 3/4" a.f.f. to the top of the gripping surface.	505.4	24.5	Lower the railings such that the bottom railings are 18" to 20" a.f.f. to the top of the gripping surface. <i>Note: There are no tolerances for a range of dimensions.</i>	2	2,3	I	\$0 to TBD
<u>Bathrooms (Men's, Women's, Unisex)</u> <u>Men's, Women's and Unisex</u> The bathrooms have signage that is 4" to 5" too low.	703	41	Under 521 CMR, signage s/b 60" a.f.f. to the centerline of the sign. Tactile characters on signs s/b 48" min. a.f.f., from baseline of lowest character and 60" max. a.f.f. to baseline of highest character.	3	2	I	\$0
The doors have slightly excessive operating forces of 16 lbs. and closing speeds of 3 to 5 seconds.	404.2.9 404.2.8	26.8 26.9	Modify the door closers so the operating forces are no more than 15 lbs. and take at least 6 seconds to close.	3	2	I	\$0
The sink piping is not wrapped.	606.5	30.9.5	Wrap or insulate the piping.	3	2	I	\$225
<u>Men's and Women's</u> The stall doors open in and not out.	604.8	30.6.1	Option #1: Reverse the door hinges and stops so the doors open out. Option #2: Seek a variance to retain the existing door swing as wheelchair maneuverability and clearances are still met.	3 3	2 1	I I	\$0 \$0
<u>Men's Only</u> The toilet paper dispenser is 1" too close to the front of the water closet.	604.7	30.7.6	Relocate the toilet paper dispenser so it is a minimum of 7" and a maximum of 9" in front of the water closet measured to the centerline of the dispenser and at least 24" a.f.f.	3	2	I	\$0
<u>Unisex Only</u> The entrance door locking mechanism is difficult to use with a closed fist or loose grip.	309.4	39.5	Lubricate the locking mechanism so that it does not require pinching and twisting and can be easily operated with a closed fist.	3	2	I	\$0
The side and rear grab bars are 36 1/4" a.f.f. and 36 1/2" a.f.f., which are too high. See Photos Alumni 4 and 5.	609.4	30.8.2	Lower the grab bars so they are 33" to 36" a.f.f. to the top of the gripping surface. <i>Note: There are no tolerances for a range of dimensions.</i>	3	2	I	\$0
<u>Portable Accessible Toilet</u> The portable toilet is not on a level surface as the running slope is up to 3.5%. The door closes in 2 seconds. The soap and towel dispensers are 10" to 13" too high and located over the	404 404.2.8 308 604.7 604.2	25.2 26.9 30.12 30.8.5 30.7.6	Replace the existing portable "accessible" toilet with an ADA Compliant toilet such that the soap and towel dispensers are no more than 42" a.f.f. and not located over the grab bars; the water closet s/b 18" from the nearest sidewall, at least 42" from the farthest sidewall,	3	2	I	TBD

grab bars. The water closet is 1" too high, 2" too close to the near wall, and 10" too close to the wall in front of the toilet. See Photo Alumni 6.	604.3	30.7.2	and 42" from the front of the water closet to the nearest wall or fixture; the water closet height s/b 17" to 19" a.f.f. to the top of the seat; and a door closing speed that is at least 6 seconds. The portable accessible toilet must be on an accessible route of travel and on a level and stable surface..				
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Total up to \$4,475+

Alumni Field Accessibility Assessment Photos

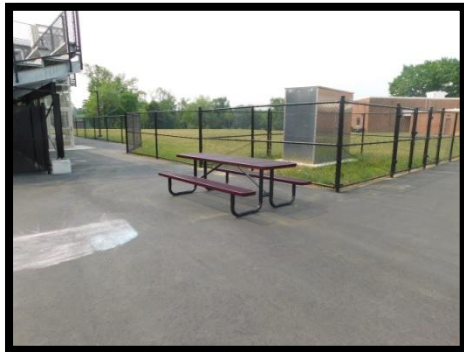


Photo Alumni 1



Photo Alumni 2

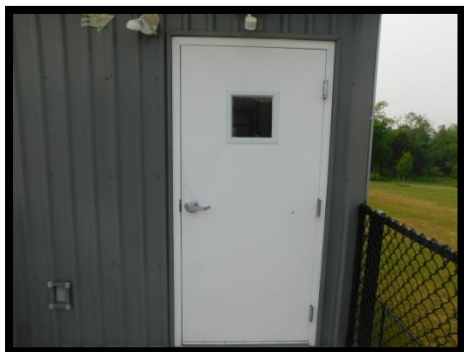


Photo Alumni 3

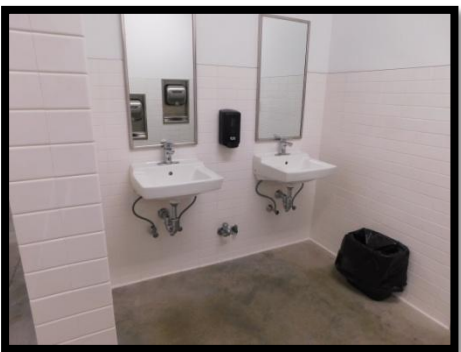


Photo Alumni 4

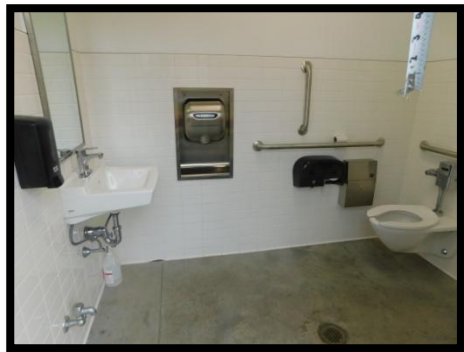


Photo Alumni 5

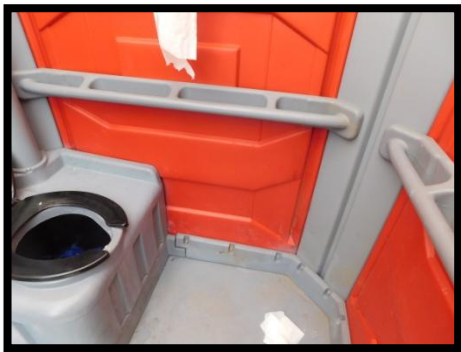


Photo Alumni 6

XVI. MILLBURY SIDEWALKS AND CURB RAMPS

MILLBURY SIDEWALKS AND CURB RAMPS

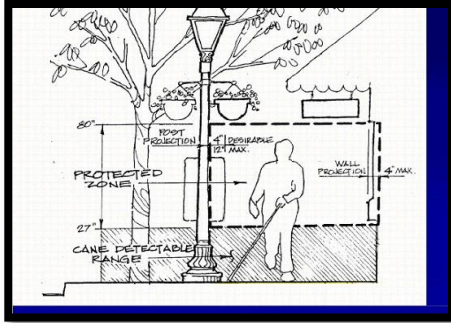
Description of Assessment Area: The assessment of public sidewalks, curb ramps, and crosswalks within the Town focused on portions of South Main Street, Main Street, North Main Street, Elm Street and Canal Street.

Regulatory Compliance: Sidewalks and curb ramps must adhere to the rules and regulations of the Massachusetts Architectural Access Board as provided in 521 CMR, and the requirements of the Americans with Disabilities Act as provided for in the regulations of the United States Access Board and as required by the United States Department of Transportation, Federal Highway Administration. These federal requirements are principally listed in the 2010 Americans with Disabilities Act Accessibility Guidelines (“ADAAG”) and the Public Right of Way Accessibility Guidelines (“PROWAG”). In addition, in March 2012, the Massachusetts Department of Transportation issued *“Notes on Walks and Wheelchair Ramps for Designers and Construction Engineers”* to be used as further guidance on this matter. These notes are a supplement to and not a replacement for the 521 CMR, PROWAG, and ADAAG Regulations.

General Standards for Compliance: In summary, the guidance and regulations under the 2010 ADAAG, PROWAG, 521 CMR, and MA DOT Notes on Sidewalks and Ramps is as follows:

Sidewalks

- A minimum of a 4 feet wide sidewalk (excluding the curb) with a 3 feet minimum unobstructed width. If the sidewalk is not 5 feet wide, then a 5 feet by 5 feet level passing space should be provided every 200’. Citation: ADAAG S. 403.5; 521 CMR S. 22.2; PROWAG.
- If the slope of the natural topography exceeds 1:20 (5%), a ramp is not required for a sidewalk. Citation: ADAAG S. 403.3; 521 CMR S. 22.3; PROWAG.
- The finished cross slope of any walkway or sidewalk should not exceed 1:50 (2.0%). Citation: ADAAG S. 403.3; 521 CMR S. 22; PROWAG.
- Walkway and sidewalk surfaces shall be firm, stable, and slip resistant. Openings in the route of travel (grates, etc.) can be no more than ½” wide. The “long” opening should be perpendicular to the route of travel. There shall be no abrupt changes in level surface of more than ¼”, unless beveled up to ½”. Citation: ADAAG S. 403, 303, 302; 521 CMR S. 22.4, 22.5, 22.7; PROWAG.
- Objects between 27” and 80” above the finish surface may not protrude more than 4” into the entire pedestrian circulation route. Citation: ADAAG S. 204, 307; 521 CMR S. 20.6; PROWAG.
- 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.

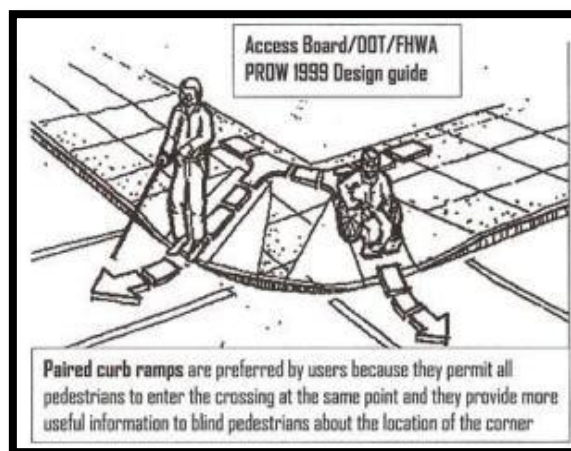
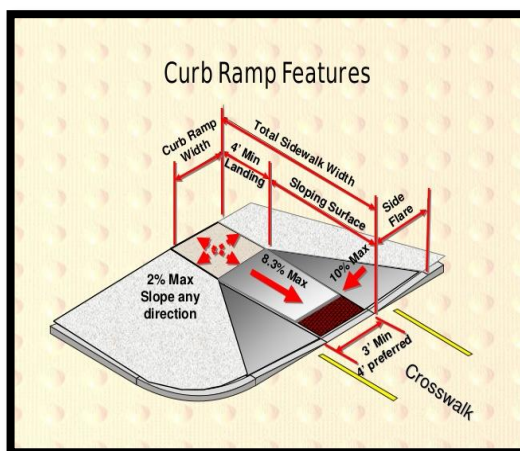


Curb Ramps

- Whenever sidewalks, walkways, or curbs on streets and ways are constructed, reconstructed, or repaired, curb cuts are required. Citation: ADAAG S. 406; 521 CMR S. 21.1; PROWAG.
- Curb cuts shall occur whenever an accessible route crosses a curb. Citation: ADAAG S. 405, 406; 521 CMR S. 21; PROWAG.
- Curb cuts are required at each corner of an intersection and typically are perpendicular to the street. Citation: ADAAG S. 406; 521 CMR S. 21; PROWAG.
- Curb cut wheelchair ramps should be placed within the general pedestrian flow to the greatest degree possible, to provide pedestrians the safety to see and be seen before crossing the street. Citation: ADAAG S. 406; 521 CMR S. 21; PROWAG.
- Paired reciprocal curb cut wheelchair ramps are preferred, however, apex ramps serving two directions may be used when intersection geometry precludes the use of paired ramps. The crosswalk should lead directly to the adjoining curb cut wheel chair ramp and sidewalk and not terminate in the roadway, a parking lot, or other area that is not part of the defined pedestrian flow. Citation: ADAAG S. 406; 521 CMR S. 21; PROWAG.
- The maximum running slope of a curb ramp shall be 1:12 (8.3%). Citation: ADAAG S. 406; 521 CMR S. 21; PROWAG.
- The maximum cross slope of a curb ramp shall be 1:50 (2%). Citation: ADAAG S. 406; 521 CMR S. 21; PROWAG.
- The maximum slope of a flared side shall be 1:10 (10%). Citation: ADAAG S. 406; 521 CMR S. 21; PROWAG.
- The minimum width of a curb ramp shall be 36 inches under ADAAG and 521 CMR but 48 inches under PROWAG, exclusive of flared sides. Citation: ADAAG S. 406; 521 CMR S. 21; PROWAG.
- Transitions from curb cuts to walks, gutters, or streets shall be flush or free of changes in level greater than ¼" or between ¼" and ½" if beveled. Citation: ADAAG S. 303, 403; 521 CMR S. 21; PROWAG.
- Grading and drainage shall be designed to minimize pooling of water, accumulation of debris, accumulation of ice or flow of water across the base of the curb cut. Citation: 521 CMR S. 21; PROWAG.
- A level landing (no more than 2.0% in all directions) at the top of the curb ramp is required. The level landing or turning area should be 4 feet deep by the width of the ramp at the curb line

(minimum 3 feet, 5 feet preferred). The preferred level landing dimension, as feasible, is 5 feet x 5 feet. Citation: ADAAG S. 406; 521 CMR S. 21; PROWAG.

- Diagonal or corner type curb ramps with returned curbs or other well-defined edges shall have the edges parallel to the direction of pedestrian flow. The bottom of diagonal curb ramps shall have a clear space 48 inches minimum outside active traffic lanes of the roadway. Diagonal curb ramps provided at marked crossings shall provide the 48 inches minimum clear space within the markings. Diagonal curb ramps with flared sides shall have a segment of curb 24 inches long minimum located on each side of the curb ramp and within the marked crossing. Citation: ADAAG S. 406; 521 CMR S. 21; PROWAG.
- Detectable warnings with truncated domes are required at all street crossings under PROWAG. Citation: PROWAG.
- Fixed objects shall not be placed in any part of a wheelchair ramp. Citation: ADAAG S. 406; 521 CMR S. 21; PROWAG.
- Catch basins should be located immediately upgrade at the wheelchair ramp entrance. Citation: ADAAG S. 406; 521 CMR S. 21; PROWAG
- Accessible pedestrian signals should provide both visual and audible information. The push button face should be parallel to the sidewalk and mounted within reach range (ADAAG and PROWAG - 15 inches to 48 inches above finished ground; 521 CMR S. 21 – 42 inches above the finished sidewalk). The side reach should be within 10 inches and there should be no forward reach obstruction. The button must be operable with a closed fist with no more than 5 lbs. of pressure to operate. The push button location should be between 1½ feet and 6 feet from the edge of the curb, shoulder, or pavement and no more than 5 feet from the crosswalk. Citation: PROWAG; ADAAG 308; 521 CMR S. 21.



Responsible Party: Highway Department and Select Board.

General Description or Obstacle Which Limits Mobility or Access: The following is a general summary of major findings of non-compliance. All sidewalks and curb ramps, unless technically infeasible, must adhere to the state and federal standards as detailed above.

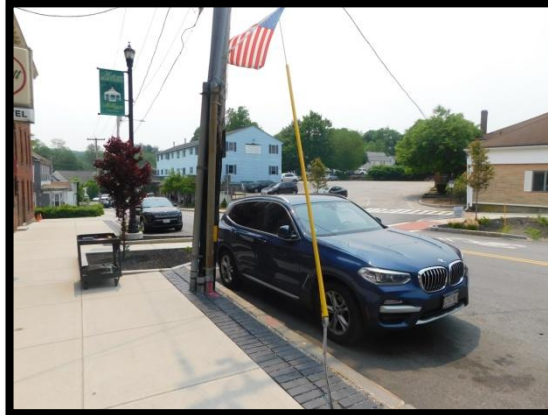
South Main Street (Elm Street to Blackstone River Bridge – odd numbered side)

Sidewalks

- Two flower baskets attached to the barrier for Calabria Ristorante's outdoor dining restrict the sidewalk clear width to 25" to 28".

Protruding Objects

- Telephone pole #2 at the Belfont Hotel has a guy wire which restricts head clearance and is a protruding object.



South Main St. (Blackstone River Bridge to Elm Street – even numbered side)

Curb Ramps and Crosswalks

- The curb ramp at School Street lacks a level landing.

Sidewalks

- The sidewalk at the #12 Apartments has up to a 12" abrupt change in level surface at the driveway.
- The sidewalk/driveway at the #12 Apartments has up to a 28% cross slope.
- The sidewalk clear width at the telephone pole and curb ramp at School Street and South Main Street is reduced to only 34".



Elm Street (Main Street to Hometown Bank – odd numbered side)

Note: The Elm Street roadway, sidewalks, and curb ramps were under construction at the time of inspection so the assessment was limited in scope.

Sidewalks

- The sidewalk/driveway at the Hometown Bank has a cross slope of 7.0% to 10.2%.



Elm Street (Main Street to A & D Pizzeria/Mykonos Bakery)

Sidewalks

- The sidewalk from #69 to #73 have cross slopes of 3.4% to 6.0%.
- The concrete at #65 is heaving with abrupt changes in level surface.
- A concrete pad at #81 has an abrupt change in level surface of up to 1½”.
- The sidewalk at the #53 and Mykonos Bakery has sidewalk deterioration, an abrupt change in level surface of 1+”, and cross slopes of up to 14.0%.
- The sidewalk at #55 has deterioration, abrupt changes in level surface, and heaving concrete.
- The sidewalk at #82 has cross slopes of 4.8% to 6.8% with abrupt changes in level surface (gas cover)





Curb Ramps and Crosswalks

- The crosswalk across Elm Street at A & D Pizzeria and Mykonos Bakery has curb ramps that lack detectable warning strip and have up 4" to 6" granite curbing on both sides.



Main Street (Elm Street to Martin Street – even numbered side)

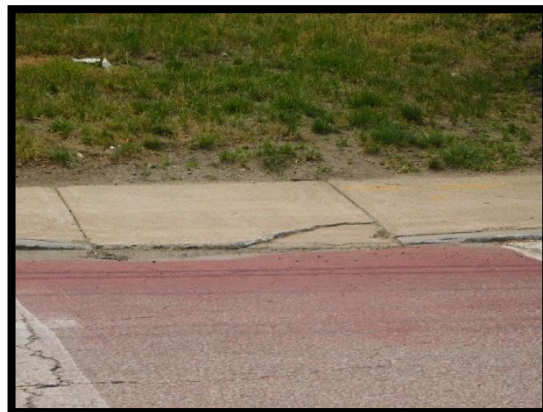
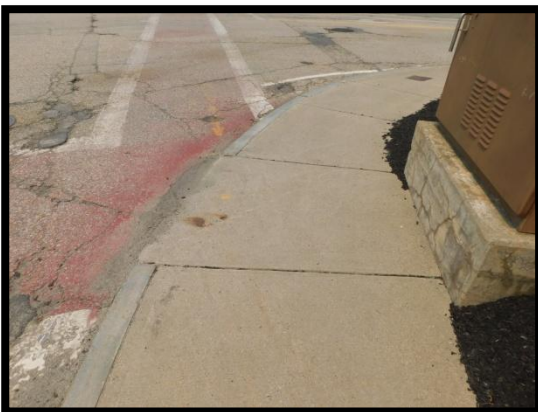
Sidewalks (Elm Street to Canal Street)

- The sidewalk from #26 to #34 has cross slopes of 5.8% to 9.4%. The clear width is reduced to 23" due to outside seating tables and chairs.
- The sidewalk at #36A to Ray's Barber Shop has cross slopes of 6.0% to 6.4%.
- The sidewalk/driveway at Ray's Barber Shop and the Millbury Credit Union has cross slopes up to 6.4%.
- The Millbury Credit Union sidewalk/driveway on Main Street has cross slopes of 3.8% to 6.2%.
- The Millbury Credit Union sidewalk/driveway on Canal Street has severe deterioration with up to 6" gaps, heaving, up to 3" abrupt changes in level surface, and cross slopes of up to 15.0%.



Curb Ramps and Crosswalks (Elm Street to Canal Street)

- The crosswalk across Main Street at Canal Street has curb ramps that lacks detectable warning strips and level landings on both sides.
- The crosswalk across Canal Street at Main and Canal Streets has curb ramps that lack detectable warning strips and level landings on both sides. The curb ramp on the Millbury Credit Union side is an apex curb ramp and has up to a 2½" abrupt change in level surface at the curb ramp (granite curbing).





Sidewalks (Canal Street to Hamilton Street)

- The sidewalk/driveway at Sam's Garage on both Main Street and Canal Street have cross slopes of 7.6% (Main Street) and 13.2% (Canal Street).
- Sidewalk cross slopes vary from 4.2% to 7.0% or more at driveways #72, #74, #78, #82, and in front of #78. In addition, vegetative overgrowth at #78 restricts clear width to less than 36".

Curb Ramps and Crosswalks (Canal Street to Hamilton Street)

- The crosswalk across Miles Street has curb ramps that lack detectable warning strips and level landings on both sides. Curb ramp running slopes vary from 9.8% to 12.4%.
- The crosswalk at #74 and Saint Brigid Church across Main Street has curb ramps that lack detectable warning strips and level landings on both sides. The crosswalk enters into a driveway at the #74 side and 4" to 5" of granite curbing on Saint Brigid's side. The curb ramp on the Saint Brigid's side is also an apex curb ramp.
- The crosswalk across Hamilton Street has curb ramps that lack detectable warning strips and level landings on both sides. Curb ramp running slopes vary from 11.2% to 18.2%. The crosswalk is also severely deteriorated with up to 3" abrupt changes in level surface and gaps in the pavement.



Sidewalks (Hamilton Street to Martin Street)

- The sidewalk immediately past Hamilton Street has sidewalk heaving and abrupt changes in level surface.
- The concrete sidewalk at Millbury Family Dentistry has severe sidewalk deterioration with abrupt changes in level surface of up to 1" +.
- There is a ½" abrupt change in level surface at the transition from sidewalk to #122 driveway.
- The sidewalk at C & S has severe deterioration with heaving and abrupt changes in level surface of up to 2". Approximately 100 feet of sidewalk has missing concrete, gaps, and excessive cross slopes up to 11.0%.



Curb Ramps and Crosswalks (Hamilton Street to Martin Street)

- The crosswalk across Highland Street has curb ramps that lack detectable warning strips and level landings on both sides. Curb ramp running slopes vary from 13.6% to 14.0%.
- The crosswalk across Orchard Street has curb ramps that lack detectable warning strips and level landings on both sides. Curb ramp running slopes vary from 14.2% to 18.0%. The crosswalk also enters into up to 5" of granite curbing.
- The crosswalk across Goff Street has curb ramps that lack detectable warning strips and level landings on both sides.
- The crosswalk across Martin Street lacks a curb ramp on the C & S side and enters into 3" granite curbing. The curb ramp on the opposite side (North Main Street) has up to a 14.0% running slope to the detectable warning strip. There is no level landing due to the accumulation of debris.

- The crosswalk at Martin Street across Main Street has curb ramps that lack detectable warning strips. The curb ramp on the Martin Street side has a running slope up to 18.4%. The curb ramp on the opposite side has up to a 5" gap, 1"+ abrupt change in level surface, no level landing, and enters into a driveway.



Main Street (Martin Street to Elm Street– odd numbered side)

Sidewalks

- The sidewalk at #133 is missing a concrete pad and has an abrupt change in level surface of 1"+.
- The sidewalk at #133 - #131 has a concrete pad that is heaving and abrupt changes in level surface of up to 2".
- There is a missing utility cover near #127 driveway. There is up to a 2" abrupt change in level surface at the #127 driveway/sidewalk.
- The sidewalk at Millbury Liquors has cross slopes up to 3.8%.
- There is sidewalk deterioration at #119, #121, #109, #103, #99, #97, at Puffin's driveway, and in front of Puffin's including abrupt changes in level surface of ½" to 2" and heaving. Sunken concrete at Puffin's driveway/sidewalk have cross slopes of up to 6.2%.
- There is severe concrete sidewalk deterioration across from Highland Street, at #75R, #75L, past #75, and past #73B. In addition there are also abrupt changes in level surface of up to 2".
- The clear width of the sidewalk at Pole #14 at Saint Brigid's Church is only 29".
- The sidewalk/driveway at #49 has a 1" abrupt change in level surface.

- The sidewalk clear width at the Mulhane Funeral driveway is reduced to 15" as a result of deteriorated concrete and granite curbing. There is also a 1" abrupt change in level surface.
- The sidewalk – driveway transition at Sunrise Detox has a 1" gap and a 1" abrupt change in level surface.
- There is a 1" abrupt change in level surface at the asphalt sidewalk and concrete sidewalk transition at Farnsworth Court on the Millbury Baptist Church side.





Curb Ramps and Crosswalks

- The crosswalk across Main Street at Hamilton Street has curb ramps that lack detectable warning strips, lack level landings, and have up to 22.8% running slopes.
- The crosswalk across West Street has curb ramps that lack detectable warning strips, lack level landings, have 1" to 4" abrupt changes in level surface, and 12% to 21% running slopes. The crosswalk is severely deteriorated with cracking and gaps. The curb ramp at Saint Brigid's Church directing pedestrians across Main and West Streets is an apex curb ramp.
- The crosswalk across Main Street at Hamilton Street has curb ramps that lack detectable warning strips, lack level landings, and have up to 22.8% running slopes.
- The crosswalk across Summer Street has curb ramps that lack detectable warning strips, lack level landings, and have up to 10.6% running slopes. A sunken water cover in the crosswalk creates a 3" abrupt change in level surface.
- The crosswalk across Main Street at Canal Street has curb ramps that lack detectable warning strips, lack level landings, and have up to 2" abrupt changes in level surface.
- The crosswalk across Grove Street has curb ramps with up to a 1" abrupt change in level surface at the Sunrise Detox side and is an apex curb ramp on the Walgreen's side.



Protruding Objects

- Telephone pole #10 at Mulhanes Funeral Home has a guy wire which restricts head clearance and is a protruding object.



XVII. APPENDICES

Appendix A: Survey Form

Appendix B: Public Notice

Appendix C: Grievance Procedure

Appendix D: Reasonable Accommodations Policy

Appendix E: Reasonable Accommodations Request Form

Appendix F: Funding Sources for Barrier Removal Planning, Design and Construction Projects

Appendix A: Survey Form

Millbury Self-evaluation Survey

Department: _____

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

2. Is 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 aware that programs/services can be modified for them due to a disability?

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

4. Briefly describe general office/service communications. Specifically, how is information disseminated and communicated? Are there assistive devices or auxiliary aids (i.e. TTY, TDD, sign language interpreter) which are used or available?

5. 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?

6. Employment Practices.
 - a. Please list the number of full- and part-time employees.

 - b. Has any of these staff declared a disability? If yes, describe.

 - c. Have you been asked to provide a reasonable accommodation? If so, please describe the request and what accommodation was provided.

 - d. Are there any required formal tests as a condition of employment? If yes, describe.

 - e. 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 B: Public Notice

Town of Millbury
Public Notice Under
The Americans With Disabilities Act

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 ("ADA" hereafter), the Town of Millbury will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

Employment. The Town of Millbury does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the United States Equal Employment Opportunity Commission under Title I of the ADA.

Effective Communication. The Town of Millbury will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in Town programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to persons with speech, hearing and/or vision impairments.

Modifications to Policies and Procedures. The Town of Millbury will make all reasonable modifications to policies and programs to ensure that persons with disabilities have an equal opportunity to enjoy all of its programs, services, and activities.

Procedure and Contact. Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of the Town of Millbury should contact the ADA Coordinator as soon as possible but no later than 72 hours before a scheduled event.

The ADA does not require the Town to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden.

Complaints and requests concerning the accessibility of programs, services and activities of the Town should be directed to:

Sean Hendricks
Town Manager/ADA Coordinator
Town Hall - 127 Elm Street
Millbury, MA 01527
Phone: 508-865-4710
Email: shendricks@millburyma.gov

The Town of Millbury will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids and services or reasonable modifications of policy.

Appendix C: Grievance Procedure

Town of Millbury
Grievance Procedure Under
The Americans With Disabilities Act

This Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 ("ADA"). This may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the Town of Millbury.

The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of complainant and location, date, and description of the problem.

Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint will be made available for persons with disabilities upon request.

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 Town's ADA Coordinator:

Sean Hendricks
Town Manager/ADA Coordinator
Town Hall - 127 Elm Street
Millbury, MA 01527
Phone: 508-865-4710
Email: shendricks@millburyma.gov

Within 15 calendar days after receipt of the complaint, the ADA Coordinator or his/her designee will meet with the complainant to discuss the complaint and the possible resolutions.

Within 15 calendar days of the meeting, the ADA Coordinator or his/her designee will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille, or audio tape. 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 or his/her designee does not satisfactorily resolve the issue, the complainant and his/her designee may appeal the decision of the within 15 calendar days after receipt of the response to the Board of Selectmen

Within 15 calendar days after receipt of the complaint, the Board of Selectmen will meet with the complainant to discuss the complaint and the possible resolutions.

Within 15 calendar days of the meeting, the Board of Selectmen will respond in writing, and where appropriate, in a format accessible to the complainant, with a final resolution of the complaint.

All written complaints received by the ADA Coordinator or his/her designee and appeals to the Town Administrator and responses from both will be retained by the Town Clerk for a period of at least 3 years.

Appendix D: Reasonable Accommodation Policy

Town of Millbury

Reasonable Accommodation Policy

In accordance with the Americans with Disabilities Act, the Town of Millbury has adopted the following policy to address requests for reasonable accommodations made by people with disabilities in its employment, services, activities, policies, procedures, rules, and regulations.

Citizens, employees or applicants for employment of the Town of Millbury with qualified disabilities should address any requests for accommodation to the Town's ADA Coordinator using the "*Reasonable Accommodation Request Form*" available on the town's website or from the Office of the Town Administrator.

Written requests should be sent to: (Note : Alternative means of filing a request such as personal interviews, phone calls, or taped requests, will be made available for persons with disabilities if unable to communicate their request in writing).

ADA Coordinator

Sean Hendricks
Town Manager/ADA Coordinator
Town Hall - 127 Elm Street
Millbury, MA 01527
Phone: 508-865-4710
Email: shendricks@millburyma.gov

If the Town of Millbury can grant the accommodation, the requestor will be notified within two weeks of receipt of the request and no further action will be required by the requestor. The request will then be implemented by the appropriate Town Department.

If the Town of Millbury cannot grant the accommodation request, the requestor will be notified in writing of the decision, along with notification of the right to file a grievance under the Town's Grievance Procedure.

Appendix E: Reasonable Accommodation Request Form

TOWN OF MILLBURY
REQUEST FOR REASONABLE ACCOMMODATION FORM

The Town requests the completion of this form to assist it in assessing your request for a reasonable accommodation. This initial information will be part of an interactive process with you as we explore your request. This form will be kept separate from your personnel file. The responses may generate the need for additional medical information.

TO BE COMPLETED BY REQUESTOR

Print Name _____ Date _____

Phone (work) _____ (personal) _____

☐ City employee ☐ Application for Employment ☐ Other (please explain) _____

Dept/Div _____ Job Title _____

APPLICANT

A. What limitation(s) is interfering with your job application process?

B. How does your limitation(s) interfere with your ability to participate in your job application process?

C. Describe any suggested accommodation(s) that you believe will assist you in addressing the above-referenced limitation(s): _____

D. Explain how the requested accommodations(s) will assist you: _____

E. If applicable, identify the source and/or cost (if known) for providing the accommodation(s):

EMPLOYEE

A. What limitation(s) is interfering with your job performance or accessing a benefit of employment?

B. What job function(s) or benefits of employment are you having difficulty performing or accessing because of that limitation(s)? _____

C. How does your limitation(s) interfere with your ability to perform your job function(s) or access a benefit of employment? _____

D. Describe any suggested accommodation(s) that you believe will assist you in addressing the above-referenced limitation(s): _____

F. If applicable, identify the source and/or cost (if known) for providing the accommodation(s):

Requestor's Signature _____

Date _____

**RETURN THIS FORM TO THE
MILLBURY ADA COORDINATOR**

Appendix F: Funding Sources for Barrier Removal Planning,
Design and Construction Projects

FUNDING SOURCES FOR BARRIER REMOVAL PLANNING, DESIGN, AND CONSTRUCTION PROJECTS

Note: This list of funding is not all inclusive and other local, private, state, and federal funding may be available to address accessibility related projects.

MA Office on Disability Municipal Americans with Disabilities Act Improvement Grant Program

There are two grant types available:

Planning Grant. These grants are for updating or creating a Self-Evaluation and/or Transition Plan as required under the Administrative Requirements of Title II of the ADA.

Project Grant. These grants are for removal of architectural or communication barriers that are present in a municipality. Design plans or applicant salaries are not eligible project grants. Project Grants are solely to remove barriers or to make physical/communication improvements at municipal properties or municipally owned facilities. Funds awarded cannot be used to make improvements to private businesses, private property, non-profit organizations, private homes, or other non-municipal properties.

Community Development Block Grant Funds (CDBG)

CDBG Funds can be accessed directly from the federal Office of Housing and Urban Development (HUD) if a municipality is an entitlement community or a designated central city. Non-entitlement communities (such as Millbury) can apply for CDBG funds on an annual state-wide competitive basis from the Massachusetts Department of Housing and Community Development. Eligible accessibility related projects include feasibility and planning projects; design and engineering for barrier removal; and physical construction improvements to remove architectural barriers, including but not limited to, sidewalks, curb ramps, building and facility access and building and facility modifications. Funding may also be awarded for accessible related communication and transportation improvements and purchases such as integrated and fixed ALS devices and COA/Municipal accessible vans.

MassWorks Infrastructure Program

The MassWorks Infrastructure Program is a competitive grant program that provides a flexible source of capital funds to municipalities and other eligible public entities primarily for public infrastructure projects that support and accelerate housing production, spur private development, and create jobs throughout the Commonwealth. Although not specifically designed to address accessibility planning or barrier removal - housing projects would be required to include a percentage of units as accessible units and surface infrastructure projects would be required to construct compliant sidewalks and curb ramps as part of the overall construction project.

MA Chapter 90 Funding

Municipalities may, upon MA DOT approval, use their allocated Chapter 90 funds for street and sidewalk improvements which would require compliance with the 2010 ADA Standards, 521 CMR, and PROWAG pertaining to sidewalk cross slopes, level changes, sidewalk widths, curb ramps, and pedestrian crossing signals.

MA Complete Streets Program

The MassDOT Complete Streets Funding Program provides technical assistance and construction funding to eligible municipalities. Eligible municipalities must pass a Complete Streets Policy and develop a Prioritization Plan. Similar to the MassWorks Program, although not specifically designed to address accessibility projects, surface infrastructure projects would be required to construct compliant sidewalks and curb ramps as part of the overall construction project. Inherent in the development of a Complete Street is meeting the most current accessibility guidelines outlined by the Americans with Disabilities Act (ADA) and the Massachusetts Architectural Access Board (AAB), which are upheld by Code of Massachusetts Regulations 521 (521 CMR).

MA Community Preservation Act (CPA)

If a municipality has adopted through town meeting the CPA program, approved projects would have to adhere to applicable standards under ADA and 521 CMR. CPA funding is often used for historic building restoration and rehabilitation projects. Depending on the nature of the work and as part of the overall building project, funding may be attributed towards access into a building as well as interior improvements such as vertical access (lift, elevator), bathroom modifications, and related accessibility improvements.