

Town of Dudley
Self-Evaluation and Transition Plan
January 2021



Prepared by:

Center for Living & Working, Inc.

Michael Kennedy, ADA Access & Advocacy Coordinator

484 Main Street - Suite 345, Worcester, MA 01608

and

James M. Mazik, AICP - Consulting Services

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 DUDLEY – 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 Dudley 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 Dudley is bound specifically by Titles I and II.

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

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

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

All towns must perform a self-evaluation of its policies, practices, programs, procedures, services, etc. (including communication) to determine compliance under the ADA. Towns must make reasonable modifications to these policies, programs, services, etc. to avoid discrimination against individuals with

disabilities unless such modification would result in a fundamental alteration in the nature of that program or service.

Although the ADA only requires local governments with 50 or more employees to take additional, specific measures, it is strongly encouraged that even smaller towns with less than 50 employees follow the same process to 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 senior center/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 Dudley 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 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.

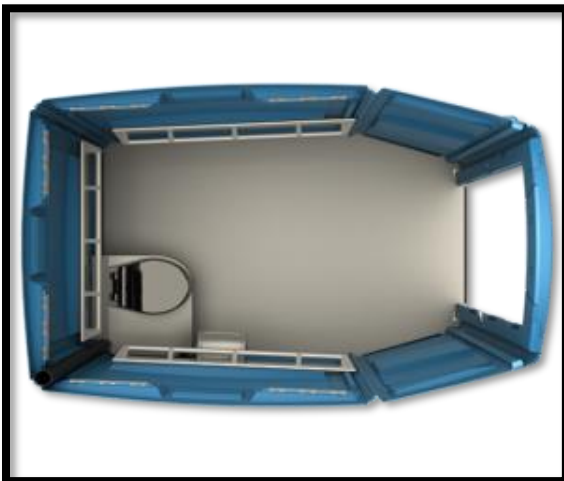
Miniature Horses

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. 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 Dudley 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.

Dudley 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 Dudley did have a Commission on Disability but it apparently has not been active for several years. There were five members when the Commission existed. The MA Office on Disability (MOD) Municipal Commission on Disability Listing as of 7/31/2019 lists James Paul as the Dudley Commission on Disability (COD) Chair with his contact information. The MA Office on Disability statewide May 12, 2020 Municipal Commission on Disability listing shows Jonathan Ruda as the Town Administrator/ADA Coordinator & COD Contact. MOD's June 2019 List of COD's shows that the Town of Dudley as having adopted both MGL Chapter 40 Section 8J and Chapter 22G (Handicap Parking fines going to the Commission on Disability) to use at their discretion.

It is recommended that the Town re-establish its Commission on Disability and appoint a minimum of 5 members to serve on this board. Once in place, the Commission should actively post information about the Commission, its meetings, and town disability-related policies on

the town's website and in the municipal office building. Re-establishing the Commission on Disability not only ensures that residents and visitors with disabilities' voices are heard, Commission members can monitor the newly established ADA Self-Evaluation/Transition Plan and help prioritize the corrective actions suggested in the document.

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.

Dudley Self-evaluation. The MA Office on Disability lists Dudley Town Administrator Jonathan Ruda as the ADA Coordinator. This is according to MOD's Municipal A.D.A. Coordinator Website Listing as of September 17, 2019. There is no listing or information regarding the ADA Coordinator on the Town's website or its 2019 annual report.

It is recommended that the appointment and listing of this position be added to the town's website, posted in the town hall, and listed in the annual report.

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.

Dudley Self-evaluation. The Town's website does not have any non-discrimination policies regarding residents or visitors with disabilities, nor is there anything posted in the town hall bulletin boards or the 2019 Annual Report.

The self-evaluation survey question “Is the public informed that these programs/services are prepared to make reasonable modifications?” responses were mostly yes. The remaining answers were either N/A, not explicitly, not aware, probably not or blank with just a comment.

Comments included were:

“The public that utilizes the town facilities are aware but we have not provided any public forum or outreach”

“Not explicitly. Most people expect the public library to serve all members of the public.”

However, expanded survey answers to this question along with the survey question “Does the department/program have a formal or informal process for responding to requests for modifications?” indicates that although no formal policies exist, staff are willing to accommodate residents and/or guests who require additional assistance. Below are some quotes from the survey respondents:

“If a resident requires a certain modification we would be happy to provide it to them. We have no formal program responding to any modifications.”

“We have an Informal process to respond to any requests, in order to accommodate for any individual requests/needs”.

“Informal. Patrons make requests to the director or youth services librarian, who work to implement modifications as necessary.”

A sample Public Notice is provided as Attachment B.

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.

Dudley Self-evaluation. . It does not appear that the Town of Dudley has an adopted ADA Grievance Procedure as required under the ADA. There is no mention of such a policy on the Town's website nor is it posted anywhere in town hall. It is recommended that the Town of Dudley create a Disabilities related section on its website and post relevant information such as the Grievance Procedure, public notices that allow for accommodation requests, and the designated ADA Coordinator contact information.

There is a Grievance Procedure for the General Public Policy in a 2004 Open Space and Recreation Plan devised by the Handicapped/Disability Commission for complaints, grievances, and/or request for policy interpretation or clarification.

The grievance or request started with the ADA Coordinator who is not identified for review. Then the complaint is forwarded to the appropriate department that the complaint or request is about. It is not clear if this Grievance Procedure was town wide or just departments pertaining to the Open Space and Recreation Plan such as Parks and Recreation or the Conservation Commission. If the complaint or request is not resolved, it goes to the Board of Selectmen who makes the final decision.

A sample Grievance Procedure is provided as Attachment C.

The sample Grievance Procedure provided is much clearer than the 2004 version and it is recommended that the Town of Dudley adopt it and post it to the recommended Disabilities section of the Town's website as previously suggested.

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. The Town should also include non-discrimination language in its employment postings and/or forms similar to that provided below.

"The Town of Dudley is an Equal Opportunity/Affirmative Action Employer. We assure you that your opportunity for employment with the town will be based only on your merit, without regard to race, religion, sex, age, national origin or disability".

Dudley 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 Dudley does not appear to have any formal reasonable accommodation or modification of programs or services policy in place. There are no policies available on the Town's website or most recent Annual Town Report.

Although there are no formal reasonable modifications in policies, practices and procedures in place, the ADA Self-Evaluation Survey results from the department heads and committee/commission chairs show that Town staff is willing to assist residents or visitors if

they request it.

Question #5 from the ADA Self-Evaluation survey – “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 majority of the survey respondents said yes or that staff was knowledgeable. One survey respondent stated, *“Yes, as we want everyone to feel included. We are happy to modify programs meeting individual needs.”*

One respondent stated, *“This Department does not offer programs and services to the public. Board meetings are open to all in the Town Hall except while the pandemic has forced the building to be closed to the public.”* Meetings that are open to the public are considered a program or service, therefore, ADA accommodations are required. Providing documents in large print for a person with a visual impairment is an example of an ADA accommodation.

Responses for Question #6 from the ADA Self-Evaluation survey – “Is the public informed that these programs/services are prepared to make reasonable modifications?” - were mostly yes or public is aware. The remaining responses were *“don’t know”, “not aware”* or *“probably not”*. The submitted comment regarding Question #6 “The public that utilizes the town facilities are aware but we have not provided any public forum or outreach” confirms that Town staff is willing to provide accommodations upon request.

Responses for Question #7 from the ADA Self-Evaluation survey – “Does the department/program have a formal or informal process for responding to requests for modifications?” were mostly *“no formal policy”* or *“informal”*. The remaining responses were *“never had a request”* or similar. The submitted comment, *“If a resident requires a certain modification we would be happy to provide it to them. We have no formal program responding to any modifications”* shows that Town staff is willing to accommodate people with disabilities even though no formal policies are in place.

For ADA Best practices, it is suggested to include the following statement on meeting announcements and postings: *“The Commission/Committee/Department will provide auxiliary aids and services, written materials in alternative formats, and reasonable modifications in policies and procedures to persons with disabilities upon advance request. Contact the named ADA Coordinator within XX days prior to the meeting”*

There should also be consistency in all departmental policies, procedures, and practices including the posting of employment ads, actual job descriptions, and reasonable accommodations to potential and existing employees. (See **Reasonable Accommodations**).

In the physical requirements/work location portion of the job description, the following paragraph or similar language should be provided: *“The physical demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions”*.

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.

Dudley Self-evaluation. Based on what was available for review, most job descriptions included language on the work environmental conditions 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.

The following verbiage is contained in the Application for Employment form available on the Town of Dudley's website under the Personnel Board tab: *"Applicants for employment are considered without regard to race, color, religion, sex, marital status, national origin, age or disability"*.

Six (6) out of the eight (8) job descriptions received for review included Reasonable Accommodation language under Physical and Mental Requirements or Physical Demands or Requirements. Below are two samples of Reasonable Accommodation language:

Physical and Mental Requirements: The physical demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the position's essential functions.

Physical Requirements: The physical demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

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 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
<p>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.</p> <p>Three (3) out of eight (8) job descriptions received had questionable language pertaining to the ADA. The following are examples of focusing on the process rather than the outcome:</p> <p><i><u>Town Clerk - Physical Skills:</u> Little or no physical demands are required to perform the work. Work effort principally involves standing and sitting for extended periods of time in order to perform work tasks, with intermittent periods of stooping, walking, pushing, pulling, kneeling, and crouching. The employee is occasionally required to lift, push or pull department equipment.</i></p> <p><i><u>Veteran's Services Clerk – Physical Requirements:</u> Minimal physical effort is required to perform duties under typical office conditions. The employee is frequently required to stand, walk, sit, talk, hear, and use hands to operate equipment. Vision requirements include the ability to read routine documents and view a computer monitor.</i></p> <p>Consider removing “process” words in bold text above and focus on the actual outcome of the task using the examples illustrated above.</p> <p>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.</p>	

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 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.

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

- Storage of items in bathrooms reducing required maneuvering clearances and clear widths.
- Bathroom stall doors that no longer operate as self-closing.
- Entry and exit doors with excessive operating forces and closing speeds.
- Routes of travel and walkways that are deteriorated and non-compliant.
- Missing elements such as signage.
- Missing protective equipment or insulation on sink plumbing.
- Accumulation of debris and leaves at base of curb ramps.

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.

Dudley 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.

Annual Town Meetings take place at Sheperd Hill Regional High School and there is no indication that Assistive Listening Systems is available there. All that was available at the bottom of the Third Annual Notice of Intent to Declare Recess & Continuance of Special Town Meeting 6/22/2020 was *"Please contact the Town Administrator with any further questions at 508-949-8001"*. There are no Assistive Listening Systems mentioned in on the Town's website in either the Town Clerk, Town Administrator or Board of Selectmen tabs.

It is recommended that Dudley add the following to all meeting agendas: *"If you need auxiliary aids and services for effective communication (such as 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 [xx] days before the activity or event."*

Answers to the Self-evaluation Survey Question #8 "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 mostly that no auxiliary devices were being used and communication is done by email, phone, or thru the postal service. Other responses were that staff were not aware of any (assistive devices or auxiliary aids) or never had a need.

The police responded with *"Our regional dispatch center is in the Town of Webster and they are equipped with TTY capability and also text to 911 capabilities. We do not have immediate access to sign language services; however, we do have many pamphlets and documents printed, in some cases multi-lingual, which are available to those entering our facility."*

The Town Clerk responded with *"Email is our most common means of communication followed by phone calls. Information is also posted on the town website including links for services that can be completed online. We do not have any auxiliary aids at the town hall"*.

During our site surveys, we found a Cap-Tel telecommunication device for communication with people with hearing impairments in the Veterans' Agent office. In addition, we found the following devices at the Pearle L. Crawford Memorial Library:

- Audio books on CD
- Great Courses on CD with audio
- Large Print books
- Access talking books from the Worcester Public Library through C.W. Mars
- E-Books & Readers (Per the Annual Report).

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

Dudley Self-evaluation. A visually impaired individual using the JAWS 2020 Screen Reading software (see Note below) was able to navigate the Town of Dudley's website, including the individual departments and Committee/Commission web pages. The website is properly labeled and links seem to work. However, it is a bit cumbersome to find the link one wants as you have to keep "arrowing" down to find each department but as far as accessibility goes you can get to the info/pages you need. In addition, some of the fonts are small and not all posted photos have text accompanying the photo to identify the image. Consider changing the red font with the gray background to something with a more legible contrast in the Dudley Fire Department's website available under the Fire Department tab.

According to staff, the town is currently working on updating the Town of Dudley's website and is seeking input on format. It is recommended that the town consider modeling its website similar to Government Websites by CivicPlus®, as it is much easier to navigate and find what one is looking for and also is screen-reading software accessible.

Government Websites by CivicPlus®, is 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 a municipality 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).

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.

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.

Dudley Self-evaluation. The front page of the Town's website only has the message: Emergencies Dial 911. There is no other Emergency Preparedness or sign-up opportunities listed here or under the Police tab.

The following message appears in the Fire Department tab: "As of July 1, 2019, Dudley will no longer use the "Code Red" emergency alert system to notify the people of our community of emergency events. We ask everyone to sign up for the "RAVE Emergency Alert System" as to continue with our ability to send emergency notifications to the people of our Town. You can find the web link below and at dudleyma.gov, www.dudleyfire.com and Dudley Fire Facebook page and Dudley Fire Twitter page. If you have any questions please call Dudley Fire Department at 508-949-8040."

The CodeRED sign up tab in the resident tab on the Town's website displays the following message: "The link you have accessed is no longer active. Please click here to contact customer support or call us at 866-939-0911 if you need additional help in resolving this error". It is recommended that the statement "The link you have accessed is no longer active" be replaced with a message re-directing website users to the Fire Department tab where they can sign up for "RAVE Emergency Alert System".

The RAVE Emergency Alert System sign-up link gives residents the opportunity to sign up for Smart911 as well that features additional information for 9-1-1 responders so they can help one faster in an emergency. In addition, a Vulnerable Needs Registry alerts Emergency Managers that special assistance is needed when a disaster strikes.

The town does not appear to have in place a formal town-wide Emergency Management Plan. When the town proceeds with developing such a plan it is recommended that the guidance provided in Chapter VII of this document be followed to address notification and assistance to persons with disabilities.

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.

Dudley Self-evaluation. There is only one polling place in Dudley located in the Senior Center at the Town’s Municipal Office Complex (71 West Main Street).

While surveying the Municipal Office Complex, early voting was taking place at the Senior Center. Overall, the voting accessibility is compliant but the AutoMark Voting Assist Terminal was not present and all the voting booths were set up for people standing. The Town Clerk explained that the AutoMark had broken the day before but had been fixed and was going to be set up later that day. In addition, the Clerk indicated they would be lowering one of the voting booths to accommodate people sitting or who use wheelchairs.

The Town of Dudley needs to ensure that voting is accessible to all and that the AutoMark Voting Assist Terminal is available and fully functional the entire time that voting takes place. In addition, the AutoMark Voting Assist Terminal must be positioned so that the screen on it is not visible to the voting public to ensure the voter’s privacy.

XI. ADA TRANSITION PLAN

In accordance with the ADA Standards and MA 521 CMR, an assessment of the Town of Dudley'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 Summer and Fall of 2020. 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 (2021-2022)
N	Near Term (2023-2026)
L	Long Term (2027-2030)

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.

List of Buildings and Facilities

Municipal Buildings: Municipal Office Building – Town Offices, Municipal Office Building – Senior Center, Municipal Office Building – Police Station, Pearle L. Crawford Memorial Library, Fire Station, Highway Department, Animal Control, and Transfer Station.

Conservation Areas: Shepherd Hill Estates, Perryville Estates, Tobin Farm Estates, Hayden Pond Road, Pierpont Road, Low Pond, Indian Road, New Boston Road, Schofield Road, and Oxford Avenue Water Department Pumping Station.

Passive Recreation Areas: New Boston Road/Peter Amorello, Sr. Memorial, Ardlock Acres, Baker Pond Road, Town Common, and Cemeteries.

Active Recreation Areas: Crawford Field, Town Beach, Fun Zone Playground, Pine Street Park, Quinebaug River Bikeway Segments, and Stevens Field.

School Recreational Facilities: Shepherd Hill Regional High School, Dudley Middle School, Dudley Elementary School, and Mason Road School.

***Note:** Buildings that are not open to the public and provide no direct services at the location are typically excluded from compliance and assessment. This includes pumping stations, highway department garages, wastewater treatment facilities and similar buildings and facilities.*

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

XII. MUNICIPAL BUILDING ASSESSMENTS

MUNICIPAL OFFICE BUILDING – Town Offices

MUNICIPAL OFFICE BUILDING – Senior Center

MUNICIPAL OFFICE BUILDING – Police Station

PEARLE L. CRAWFORD MEMORIAL LIBRARY

FIRE STATION

HIGHWAY DEPARTMENT

ANIMAL CONTROL

TRANSFER STATION

MUNICIPAL OFFICE BUILDING – TOWN OFFICES

Description of Facility and Programs: The Dudley Town Offices are located in the Municipal Office Building and occupy part of the ground floor as well as the first and second floor levels. The police department and the senior center also occupy a portion of the building.



Responsible Party: Board of Selectmen.

General Description or Obstacle Which Limits Mobility or Access: The municipal office building is substantially compliant but does have some significant areas of non-compliance. The parking is inadequate and non-complaint. There are also non-compliant “accessible routes” to the buildings’ entrances. See further discussion on Parking and Accessible Routes below. The drop boxes (Lions, USPS) at the front of the building are not within the allowable reach range. Egress door stair railings are not round or oval. The picnic table at the rear of the building near the fire pit lacks the minimum required knee and toe depth. Exterior and interior doors with closers exceed the maximum allowed operating force and do not meet the minimum closing speed requirement. Some doors have glass panes that exceed the maximum height allowed under the 2010 ADA Standards. In addition, some doors lack accessible tactile signage or the signage is mounted too high or is not on the latch side of the door. Stair railings are non-compliant throughout as they lack extensions at the top and bottom and are not fully continuous. There are protruding objects in the hallways, offices, and meeting rooms including room signage, defibrillators, a bulletin board, a map drawer, and a TV monitor. Some of the wall mounted hand sanitizers are not within accessible reach range. The employee kitchenette sink/counter lacks knee clearance and the towel dispenser is too high. The Selectboard meeting room tables lack adequate knee clearance. The “accessible” bathrooms have numerous areas of non-compliance including sink piping that is not fully insulated, dispensers and coat hooks that are too high, sink faucets

with excessive operating forces and which do not stay open for at least 10 seconds, grab bars that are too high or missing, and stall doors that open in and do not have pull devices on both sides of the door.

Assistive Listening System

It does not appear that the Municipal Office Building has an assistive listening system (ALS) for persons who are hard of hearing as no signage was present. It is recommended that an assistive listening system for shared use in other municipal locations be provided. An ALS with up to 12 receivers with 6 being hearing-aid compatible can be purchased for approximately \$2,500.

Parking and Exterior Accessible Routes of Travel to the Municipal Office Building

There are 143 total parking spaces in the side and rear parking areas for the Municipal Office Complex including 7 designated accessible spaces, which exceeds the minimum required 5 spaces for up to 150 parking spaces. However, the designated accessible parking spaces for the former entrance to the senior center have excessive cross slopes. In addition, the initial portion of the concrete accessible route (roughly 14') to the side entrance has running slopes that vary up to 7.7%. Currently this entrance is closed due to COVID-19. This also no longer serves as an accessible entrance to the senior center as the interior lift near the entrance has been put out of service and according to town personnel, it is not intended to be used in the future. As a result, these 3 designated accessible parking spaces near the senior center entrance can no longer be considered as viable accessible spaces as they are too far from the main entrance with no accessible route of travel from these spaces to the main entrance.

Additional Concerns

- In addition, the ramp to the picnic table and fire pit at the back of the building have running slopes that slightly exceed the maximum allowed and a storm drain grate in the accessible route which exceeds the maximum allowed grate openings.
- The accessible route to the "police only" entrance has a ramp with running slopes that vary from 5.2% to 10.0%, a length that exceeds the maximum of 30' without a level landing, and no railings. There is also a 4" vertical rise at the doorway to gain entry into the building.
- The exterior stairs near the Police Station main entrance lacks railings.

Recommendations

- It is recommended that the 3 accessible spaces near the senior center entrance be converted to regular parking spaces and one additional accessible parking space be created at the main entrance to achieve the minimum required # of 5 designated accessible parking spaces.
- The side senior center entrance should be designated as "egress and town staff only" with directional signage posted noting the location of the accessible entrance. A variance will be required.
- Railings will be required for the segments of concrete which exceed the maximum 5.0% up to 7.7%.
- The route of travel from the rear parking to the rear "police only" entrance should have signage at the top of the stairs near the parking noting that this is for police personnel only and also directing users to the main accessible entrance. A variance will be required.
- Due to the maximum ramp slope exceedance of only 0.2% to 0.4% to the picnic table/fire pit area and the excessive cost to correct vs. the actual benefit gained, a variance should be sought

to retain the existing ramp. In addition, a securely installed mesh covering should be placed over the storm drain. A variance will be required for the ramp.

- Railings should be installed at the side stairs near the police station entrance.

Municipal Office 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> See above narrative. In addition, the single designated accessible space in the parking lot lacks signage, has no striped access aisle, nor a striped accessible route to the main entrance. The 3 designated accessible spaces closest to the building all have signage that is nearly 30" too low. The shared access aisle for the van is 3' too narrow. The parking space closest to the entrance lacks an access aisle. See Photos MOB 1 and 2.	502 302 703.7.2	23	Based on the above recommendations, convert the 3 designated accessible parking spaces at the side senior center entrance to regular parking. Reconfigure the accessible parking at the main entrance such that there are a minimum of 5 designated accessible spaces, with at least one being van accessible. Create/restripe the accessible spaces so that the passenger vehicle spaces are 8' wide with a 5' wide access aisle and the van accessible space is 8' wide with an 8' wide access aisle. All spaces should be as close as possible to the accessible entrance. If not immediately adjacent to a formal walkway, then a striped accessible route through the parking lot to the curb ramp and walkway s/b provided. Signage must be set such that the height should be a minimum of 60" high at the bottom and a maximum of 96" at the top and located no more than 10' in front of the space. Signage from the former senior center entrance accessible parking can be re-used.	1	2	I	\$250
<u>Accessible Routes to the Building</u> See above narrative concerning the ramp to the picnic table and fire pit, "police only" rear stairs and ramp, side stair railings, and side entrance to senior center. In addition, the front egress stair railings are not round or oval. See Photos MOB 3, 4, 5, and 6.	302.3 403 404.2.5 405 505	22 24 25.4 26.10 27	Based on the above recommendations, seek variances for use of the "police only" accessible route and doorway and entrance near senior center as "staff only" and interior "egress" only. Provide exterior signage noting the designation (police, staff, egress) as well as directional signage for the main accessible entrance. Seek a variance for the ramp slope to the picnic table and fire pit. Seek a variance for the front egress only stair railings. Securely install metal mesh over the storm drain so the grates have openings of no more than ½" Install continuous stair railings on both sides of the stairs near the police entrance. 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). Install paired paired railings (34" – 38" a.f.f. top/18" – 20" a.f.f. bottom) with 12" extensions at the top and bottom of the "concrete ramp" at the senior center side entrance near the asphalt parking area.	1, 2 4 4 4 1 1	1 1 2 3 3	I I I N N	\$200 \$0 \$0 \$75 Up to \$1,600 Up to \$3,750

War Memorial A segment of the War Memorial walkway has an abrupt change in level surface of approximately 2". See Photo MOB 7.	403.4	22.4.1	Infill the ground surface with brick or another material so that there is no more than a ¼" change in level surface.	2	2	I	\$100
Drop Boxes The USPS and Lion's drop boxes located near the main entrance to the building have envelope drops that are 4" too high under the 2010 ADA Standards.	308.2 308.3	6.5 6.6	Modify or replace the drop boxes so that the envelope drops are no more than 48" a.f.f. <i>Note: The boxes are located on 4" slabs. Removal of the slabs and direct mount into the concrete sidewalk would put the drop boxes within reach range.</i>	2	2	N	Up to \$150
Picnic Table The picnic table near the fire pit at the back of the building does not provide the required accessible knee/toe depth.	226.1 902	19	At least 5% or at least one table must be accessible. Purchase one accessible picnic table. The table surface s/b 28" to 34" a.f.f. to the top surface with at least 27" knee clearance, 30" clear width, and 19" depth.	2	2	N	\$750
Doors with Closers Egress doors and interior doors (offices, meeting rooms, bathrooms) do not fully comply with the maximum allowed operating force for an exterior door (15 lbs.) and interior door (5 lbs.) and the minimum closing speed requirement of 6 seconds. Operating forces for interior doors vary up to 18 lbs. and closing speeds are as quick as 2 seconds.	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	2	I	\$0
Protruding Objects The following are protruding objects as they extend more than 4" into the accessible route of travel between a height of 27" and 80" a.f.f. or have vertical clearance reduced to less than 80". <ul style="list-style-type: none"> • Ground level bulletin board • Veteran's Agent wall mounted hallway sign • Town Collector wall mounted hallway sign • Town Treasurer wall mounted hallway sign • Town Clerk wall mounted hallway sign • Assessor's Office wall mounted hallway sign • Level 1 defibrillator • Assessor's hallway map drawer • Copy/mail room shelf and time stamp • Level 2 defibrillator • Board of Health wall mounted sign • Water Department wall mounted sign • Planning Board wall mounted sign • Meeting Room (#321) TV monitor See Photos MOB 8, 9, and 10.	307.2	20.6.1	Place a fixed object under the bulletin board, defibrillators, TV monitor, and shelves. Modify the Assessor's map drawer so the protrusion does not extend more than 4" into the hallway or construct wing walls and mount at each end. In addition, the drawer opening mechanism is difficult to operate with a closed fist and should be modified. Raise the wall mounted hallway office/room signage so that the signage is at least 80" a.f.f. at the bottom of the sign(s).	2	2	I	Up to \$150

<p><u>Signage</u></p> <p>The following interior doors lack tactile accessible signage:</p> <ul style="list-style-type: none"> • Veteran's Agent (2nd hallway door) • Collector's office storage door • Meeting room (#321A-C) interior doors (4) • BOS meeting room/Town Administrator door between room/office (2) <p>The following signs are not on the latch side of the door:</p> <ul style="list-style-type: none"> • Veteran's Agent sign (#102) <p>The following signs are 1"-2" too high:</p> <ul style="list-style-type: none"> • Committee room (#315) • Town Accountant/Personnel Board (#307) • Board of Health (#304) <p>See Photos MOB 11 and 12.</p>	703	41.1	<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>Relocate Room #102 sign to the latch side of the door.</p> <p>Signage that is too high must be lowered to 60" a.f.f. to the centerline of the sign.</p>	2	2	I	\$280
<p><u>Reach Range</u></p> <p>Wall-mounted hand sanitizers and dispensers at the following locations exceed the maximum reach range under the 2010 ADA Standards:</p> <p><u>Hand Sanitizers</u></p> <ul style="list-style-type: none"> • Near Treasurer's Office (#211) • Town Collector's Office (#206) • Level 2 hand sanitizer at elevator <p><u>Dispensers</u></p> <ul style="list-style-type: none"> • Employee Break Room towel dispenser over a 24" counter 	308.2 308.3	6.5 6.6	<p>Lower the sanitizers and towel dispenser to a height of no more than 48" a.f.f. (2010 ADA Standards). The towel dispenser should also be relocated so that it is not over a counter unless the sink/counter is modified to provide knee clearance (<i>see below</i>).</p>	2	3	N	\$0
<p><u>Employee Lounge</u></p> <p>The counter and sink in the employee lounge does not provide knee clearance.</p> <p>See Photo MOB 13.</p>	804.3.2 306.2	32.2 32.6 32.7	<p>Modify the counter and sink so that there is a minimum of 27" knee clearance at the sink with guarded, wrapped, or insulated piping.</p>	4	3	L	Up to \$500
<p><u>Stair Railings</u></p> <p>Interior stair railings are non-compliant as they lack extensions at the top and bottom.</p> <p>See Photo MOB 14.</p>	504 505	27	<p>Seek a variance to maintain existing railing on the interior stair railings. Install extensions on the outside railings - at the top 12" parallel to the floor and the slope distance of one tread then 12" parallel to the floor at the bottom.</p>	2	3	N	Up to \$1,800
<p><u>Desk/Table Knee Clearance</u></p> <p>The following desks/tables do not provide the minimum required 27" of knee clearance:</p> <ul style="list-style-type: none"> • Table for captel phone for the hearing impaired in the Veteran's Agent Office. • BOS desks/tables 	226.1 306.2 306.3	35	<p>Block the desks/tables (at least 1 in BOS meeting room) a minimum of 2" to achieve 27" of knee clearance.</p>	2	2	I	\$75

<u>Clear Widths and Clear Floor Space</u> Interior access within the Assessor's Office is restricted at one point to 31" – 32" of clear width. Due the placement of a table, the clear floor space in front of the stove in the employees lounge is reduced to 31½". The clear width to the cable access "command center" in the BOS meeting room is restricted to 15½".	403.5 304	20.3 32	As may be required as a reasonable accommodation, rearrange furniture and other fixed objects to achieve a minimum of 36" clear width.	2	2	N	\$0
<u>Doors with Glass Panes</u> The Cable Access office door (#319) has a glass pane of 45" a.f.f which exceeds the maximum viewing height of 43".	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. Modify the door to comply with the maximum height restriction or block/frost the glass pane.	4	3	L	\$0 to \$300
<u>Bathrooms</u> <u>Level 1-3 Men's/Women's Bathrooms</u> The coat hooks are 15"-21" too high under the 2010 ADA Standards. The side and rear grab bars are ½" - 1" too high. The ground Level (L1) women's bathroom lacks a rear grab bar. <i>Note: There are no tolerances allowed for a range of dimensions.</i> <u>Level 1 Women's and Level 2-3 Men's/Women's Bathrooms</u> The paper towel dispensers are outside the zone of reach under 521 CMR by 11½ - 21". <u>Level 2 Men's and Level 3 Men's/Women's Bathrooms</u> The paper towel dispensers are protruding objects as they extend more than 4" into the accessible route of travel between a height of 27" and 80" a.f.f. In addition, there is insufficient clear width to access the L3 Men's towel dispenser due to a wall mounted dispenser/waste basket. <u>Level 2 and Level 3 Men's and Women's Bathrooms</u> The water closet stall doors open in and not out as required. The stall doors lack exterior pull devices. <u>Level 1 Men's and Level 3 Men's/Women's Bathrooms</u> The toilet paper dispensers are 10" to 20½" o.c. from the front of the water closet.	308.2 308.3 609.4 604.5 308.2 308.3 307.2 205 604.8.1.2 604.8 604.7	6.5 6.6 30.8 30.12 20.6.1 30 30.6.1 30.6 30.7.6	Lower the coat hooks to no more than 48" a.f.f. Lower the grab bars to a height of between 33" to 36" a.f.f. Install a rear 42" long grab bar in the ground level women's bathroom at a height of 33"-36" a.f.f. to the top of the gripping surface and located no more than 6" from the interior corner. Lower dispenser to a max. of 42" a.f.f. Place a fixed object under the L2 Men's and L3 Women's dispensers. Relocate the L3 Men's dispenser. Reverse stall doors so they swing out. Install compliant pull devices on both sides of the stall doors. Relocate the dispensers. Toilet paper dispenser s/b 7" minimum and 9" maximum in front of the water closet measured to the centerline of the dispenser.	3 3 3 3 3 3	2 2 2 2 2 2	I I I I I I	\$0 \$125 \$0 \$0 \$200 \$60 \$0

<p><u>Level 1 Men's and Women's Bathrooms</u> The metered sink faucets require 10 to 11 lbs. of operating force which is 5 to 6 lbs. too much. The faucet remains open for only 3 seconds and not the minimum required 10 seconds.</p> <p><u>Level 3 Men's and Women's Bathrooms</u> The sink piping is not fully wrapped, insulated, or guarded.</p> <p>The rim of the sinks are 1 3/8" – 1 3/4" too high.</p> <p><u>Level 2 Men's Bathroom</u> The water closet stall door is not fully self-closing.</p> <p><u>Level 3 Women's Bathroom</u> The water closet is 1 1/2" too far from the near wall.</p> <p><u>Level 3 Men's Bathroom</u> Due to the urinal shield, there is only 27 1/4" clear width at the urinal, which is 2 3/4" too narrow.</p> <p>The side grab bar is 1" too far from the interior corner and the rear grab bar is 1" too far from the interior corner.</p> <p>The locking device for the stall door is difficult to operate and requires more than 5 lbs. of operating force to use.</p> <p>See Photos MOB 15, 16, 17, and 18.</p>	309 606.4	30.9.6	Adjust the sink faucet so that the operating force is no more than 5 lbs. and the faucet remains open for at least 10 seconds.	3	3	I	\$100
	606.5	30.9.5	Wrap and/or insulate the shut-off valves.	3	2	I	\$50
	606.3	30.9.2	Replace the sink or modify the counter such that the rim of the sink is no more than 34" a.f.f.	3	3	N	Up to \$750
	604.8	30.6	Adjust the closer so that the door is fully self-closing.	3	2	I	\$0
	604.2	30.7.2	Relocate the water closet so that it is 18" o.c. to the centerline of the water closet to the near wall and at least 42" o.c. to the centerline of the water closet to the far wall.	3	3	N	Up to \$750
	605.3 305	30.10.2	Modify or remove the urinal shield so it provides an approach width of 30" and at least 29" between urinal shields.	3	2	I	\$0
	604.5	30.8.1	Relocate the grab bars such that the side grab is no more than 12" from the interior corner and the rear grab bar is no more than 6" from the interior corner.	3	2	I	\$0
	309.4	30.13 39.5	Modify or replace the locking device so it is easily operable with a closed fist and takes no more than 5 lbs. to operate.	3	2	I	Up to \$50

Total \$12,065

Municipal Office Building - Town Offices Assessment Photos



Photo MOB 1



Photo MOB 2



Photo MOB 3



Photo MOB 4

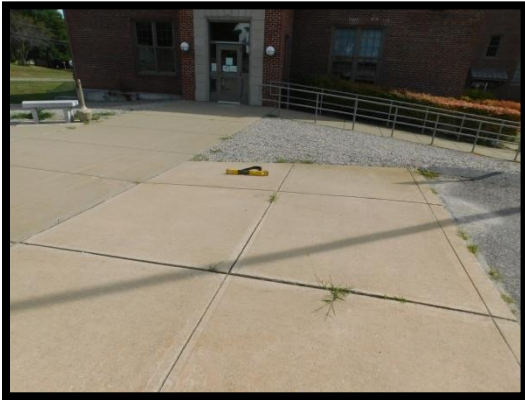


Photo MOB 5



Photo MOB 6



Photo MOB 7



Photo MOB 8



Photo MOB 9



Photo MOB 10



Photo MOB 11



Photo MOB 12



Photo MOB 13

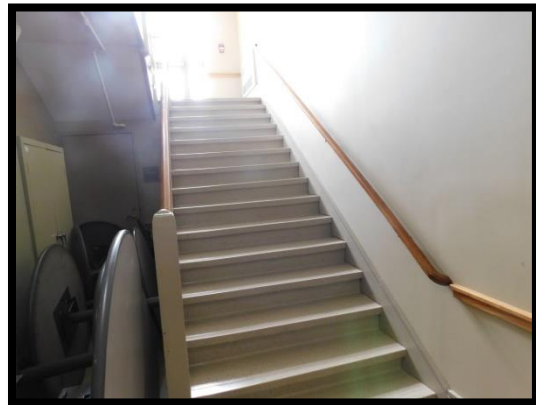


Photo MOB 14



Photo MOB 15



Photo MOB 16



Photo MOB 17



Photo MOB 18

MUNICIPAL OFFICE BUILDING- SENIOR CENTER

Function and Description of Facility and Programs: The senior center occupies part of the ground level of the municipal office building. Services offered to seniors include transportation, meals, fuel assistance, food, tax assistance, hearing/nurse appointments, various classes, and numerous activities.



Responsible Party: Board of Selectmen, Council on Aging

General Description or Obstacle Which Limits Mobility or Access: Although there is parking for the senior center near the closest building entrance to the senior center, the parking is non-compliant, the exterior accessible route to the building has excessive running slopes with no railings, and there is no interior access from the 1st level entrance to the ground level senior center as the chair lift has been put out of service. As a result, seniors use the main ground level entrance to access the senior center. **See Parking and Accessible Route discussion in Municipal Office Building – Town Offices Accessibility Assessment.** The double doors to the senior center have an excessive operating force and close too quickly. The kitchen area sink lacks knee clearance and has a towel dispenser that is too high. The defibrillator and the check in scanner are protruding objects. The men's and women's bathrooms have a number of areas of non-compliance relating to heights, clearances, maneuverability, grab bars, and related items.

Municipal Office Building/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 and Accessible Route of Travel</u> See Municipal Office Building – Town Offices Accessibility Assessment.	NA	NA	NA	-	-	-	-

Interior Doors The interior double doors to the senior center and the doors to the men's and women's bathrooms do not fully comply with the maximum allowed operating force for an 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 push/pull force does not exceed 5 lbs and door closing speed is at least 6 seconds.	2	2	I	\$100
Kitchen Area The sink in the designated kitchen does not provide knee clearance. The towel dispenser is 13" too high under the 2010 ADA Standards. See Photo Senior Center 1.	804 306 308.2 308.3	32 6.5 6.6	Modify the counter and sink so that 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.	4 4	3 2	N I	Up to \$500 \$0
Protruding Objects The following are protruding objects as they extend more than 4" into the accessible route of travel between a height of 27" and 80" a.f.f. or have vertical clearance reduced to less than 80": <ul style="list-style-type: none"> Defibrillator Shelf w/scanner w/monitor See Photos Senior Center 2 and 3.	307.2	20.6.1	Place a fixed object under the defibrillator and the shelf with the scanner/monitor.	4	1	I	\$0
Men's Bathroom The towel dispenser is 15½" too high under 521 CMR. The coat hook is roughly 69" a.f.f., which is 21" too high under the 2010 ADA Standards. The metered/self-closing faucet requires 10 lbs. of operating force which is 5 lbs too great and stays open for only 2 seconds. The grab bars are ¾" too high. The allowable height for grab bars is 33" to 36" a.f.f. <i>Note: There is no tolerance allowed for dimensions within a range or with a maximum and minimum.</i>	309 308 308.2 308.3 309 606.4 609.4	30.12 30.6 39.5 30.9.6 30.8.2	Lower dispenser to a height of 42" a.f.f. Lower the coat hook to a height of no more than 48" a.f.f. Adjust the faucet so it requires no more than 5 lbs. to operate and stays on/open for at least 10 seconds. Lower both the side and rear grab bars so that are between 33" and 36" a.f.f. to the top of the gripping surface.	3 3 3 3	2 2 3 2	I I I I	\$0 \$0 \$100 \$0
Women's Bathroom The towel dispenser is 15" too high under 521 CMR and provides only 24" of clearance to access the dispenser. The coat hook is roughly 65" a.f.f., which is 17" too high under the 2010 ADA Standards. The metered/self-closing faucet requires 8 lbs. of operating force which is 3 lbs too great and stays open for only 1 to 2 seconds.	309 308 305 308.2 308.3 309 606.4	30.12 30.5 30.6 39.5 30.9.6	Relocate the dispenser to provide a minimum 30" x 48" approach and a height of no more than of 42" a.f.f. at the control device. Lower the coat hook to a height of no more than 48" a.f.f. Adjust the faucet so it requires no more than 5 lbs. to operate and stays on/open for at least 10 seconds.	3 3 3	2 2 3	I I I	\$0 \$0 \$100

<p>The grab bars are ¾" too high. The allowable height for grab bars is 33" to 36" a.f.f. The side grab bar is ¾" too far from the interior corner. <i>Note: There is no tolerance allowed for dimensions within a range or with a maximum and minimum.</i></p> <p>The rim of the sink is 35¼" a.f.f. which is 1¼" too high.</p> <p>The toilet paper dispenser is on the rear wall and not in front of the water closet on the side wall.</p> <p>The water closet stall door opens in and lacks a pull device on the interior side of the stall door.</p> <p>See Photo Senior Center 4.</p>	609.4 604.5	30.8.1 30.8.2	Lower both the side and rear grab bars so that are between 33" and 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.	3	2	I	\$0
	606.3	30.9.2	Modify the sink/counter so that the rim of the sink is no more than 34" a.f.f.	3	3	N	Up to \$750
	604.7	30.7.6	Relocate the toilet paper dispenser or install an additional dispenser that is mounted on the side wall closest to the toilet with the centerline of the dispenser a minimum of 24" a.f.f and located between 7" to 9" in front of the toilet.	3	2	I	\$100
	604.8	30.6	Reverse the stall door so that it swings out and install a pull device on the interior of the stall door.	3	2	I	\$50

Total up to \$1,700+

Municipal Office Building/Senior Center Accessibility Assessment Photos



Photo Senior Center 1



Photo Senior Center 2



Photo Senior Center 3



Photo Senior Center 4

MUNICIPAL OFFICE BUILDING - POLICE STATION

Description of Facility and Programs: The Dudley Police Station is located in the Municipal Office Building and occupies part of the ground and first floor levels. In addition to the Chief of Police, the department consists of three (3) Sergeants, ten (10) full- time Police Officers, nine (9) Reserve Police Officers, and one (1) Administrative Assistant. The department fleet consists of seven (7) marked cruisers and three (3) unmarked cruisers. The Dudley Police Department is a non-civil service department. Dispatch is handled externally by the South Worcester County Communications Center in the town of Webster.



Responsible Party: Board of Selectmen.

General Description or Obstacle Which Limits Mobility or Access: The Police Station is substantially compliant but does have some areas of non-compliance. The “town collector drop box” in the lobby exceeds the maximum reach range. Interior doors exceed maximum operating force and minimum closing speeds. Some interior doors lack tactile signage, the signage is not mounted on the latch side, or the signage is too high. A wall mounted “fire blanket box” serves as a protruding object. The “public use” bathroom in the lobby has a number of areas of non-compliance including dispensers/coat hooks that are too high, sink faucets that are too hard to operate and do not stay open long enough, and a toilet paper dispenser that is not located properly. There are doors with glass panes which are too high. There is an apparent “accessible holding cell” however the metered faucet does not stay on for a minimum of 10 seconds and the operating force to activate exceeds 5 lbs. The cell does not provide grab bars for the water closet (see below). The former dispatch bathroom has minor areas of non-compliance (grab bars that are $\frac{3}{4}$ ” – 1” too high, a towel dispenser that is 6” too high, and sink piping that requires wrapping). Although dispatch services are no longer provided in Dudley, it is presumed that the current civilian administrative staff would have access to this bathroom therefore necessitating modifications.

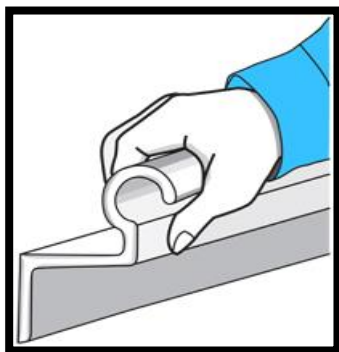
Reasonable Accommodations

The Men and Women Officer bathrooms and locker rooms have a number of areas of non-compliance including showers, water closets, dispensers, clearances, heights, etc. In addition, the officer's physical training room has insufficient clear width between workout equipment. None of these areas are open to the public and limited for use only for sworn police personnel. All police officers must meet strict physical requirements which a person with a mobility limiting disability would not be able to perform. Therefore, unless there are changes in policies, procedures, and operations, modifications to these areas are not required at the present time.

Under 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 feasible and necessary 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 and Accessible Route of Travel See Municipal Office Building – Town Offices Accessibility Assessment.	NA	NA	NA	-	-	-	-
Interior Doors Interior doors with closers (including lobby bathroom) do not comply with the minimum closing speed requirement of 6 seconds under 521 CMR or the maximum operating force of 5 lbs.	404.2.8 404.2.9	26.8 26.9	Adjust door closers such that the door closing speeds are at least 6 seconds. Adjust door closers such that the push/pull forces do not exceed 5 lbs for the interior doors.	1	2	I	\$0
Town Collector Drop Box The Town Collector drop box located in the lobby of the police station has an envelope drop that is 2" too high. See Photo Police 1.	308.2 308.3	6.5 6.6	Modify or replace the drop box so that the envelope drop is no more than 48" a.f.f.	4	2	N	Up to \$150
Signage The following interior doors lack tactile accessible signage: <ul style="list-style-type: none">Door to station from MOB-town office lobbyDoor to dispatchDoors to town hall and internal hallway (2)Doors in training room (2)door opposite room #322 The following interior doors have tactile accessible signage that is not on the latch side of the door: <ul style="list-style-type: none">Room #140Room #133 The following interior doors have tactile accessible signage that is too high: <ul style="list-style-type: none">Room #111Room #112Room #215 See Photo Police 2.	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). Relocate Room #111 and #112 signs to the latch side of the door. Signage that is too high must be lowered to 60" a.f.f. to the centerline of the sign.	2	2	I	\$245
Protruding Objects The following are protruding objects as they extend more than 4" into the accessible route of travel between a height of 27" and 80" a.f.f. or have vertical clearance reduced to less than 80". <ul style="list-style-type: none">Wall mounted "fire blanket box" See Photo Police 3.	307.2	20.6.1	Relocate the fire blanket box or place a fixed object below it for cane detection.	2	2	I	\$0

<u>Doors with Glass Panes</u> The following interior doors (16) with glass panes exceed the maximum viewing height of 43": Dispatch, #138, #112, exit door near #123, #120, booking area (6), #231, #218, #228, #220, level 2 door to stairs See Photo Police 4.	404.2.1 1	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. Modify doors/panels to comply with maximum height restriction <u>or</u> frost or block viewing pane.	4	3	L	\$0 to \$5,100
<u>Lobby Bathroom</u> The toilet paper dispenser is on the rear wall and not in front of the water closet on the side wall. The metered/self-closing faucet requires 15 lbs. of operating force which is 10 lbs too great and stays open for only 1 second. The coat hook is roughly 67" a.f.f., which is 19" too high under the 2010 ADA Standards. The wall mounted towel dispenser is 17" too high. The rear and side grab bars are 1"–1 1/8" too high (<i>Note: No tolerances are allowed for dimensions within a range</i>). See Photo Police 5.	604.7 309 606.4 308.2 308.3 308.2 308.3 609.4	30.7.6 39.5 30.9.6 30.6 30.12 30.8.2	Relocate the toilet paper dispenser or install an additional dispenser that is mounted on the side wall closest to the toilet with the centerline of the dispenser a minimum of 24" a.f.f and located between 7" to 9" in front of the toilet. Adjust the faucet so it requires no more than 5 lbs. to operate and stays on/open for at least 10 seconds. Lower the coat hook to a height of no more than 48" a.f.f. Lower the dispenser so it is no more than 42" a.f.f. for the reach height under 521 CMR. Lower the grab bars so that they are between 33" to 36" a.f.f. to the top of the gripping surface.	3 3 3 3	2 3 2 2	I I I I	\$100 \$75 \$0 \$0 \$0
<u>Former Dispatch Bathroom</u> The wall mounted towel dispenser is 6" too high. The rear and side grab bars are ¾"–1" too high (<i>Note: No tolerances are allowed for dimensions within a range</i>). The sink piping is not fully wrapped.	308.2 308.3 609.4 606.5	30.12 30.8.2 30.9.5	Lower the dispenser so it is no more than 42" a.f.f. for the reach height under 521 CMR. Lower the grab bars so that they are between 33" to 36" a.f.f. to the top of the gripping surface. Fully wrap or insulate the piping.	3 3 3	2 2 2	I I I	\$0 \$0 \$25
<u>Accessible Jail Cell</u> The metered/self-closing faucet requires 15 lbs. of operating force which is 10 lbs too great and stays open for only 1 second.	309 606.4	39.5 30.9.6	Adjust the faucet so it requires no more than 5 lbs. to operate and stays on/open for at least 10 seconds.	3	3	I	\$75

Total Up to \$5,770

Police Station Assessment Photos



Photo Police



Photo Police 2

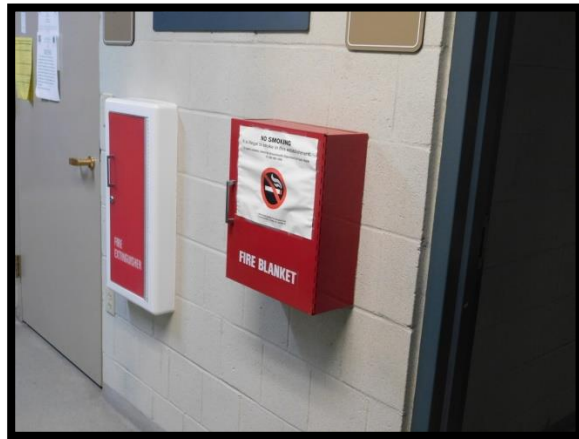


Photo Police 3

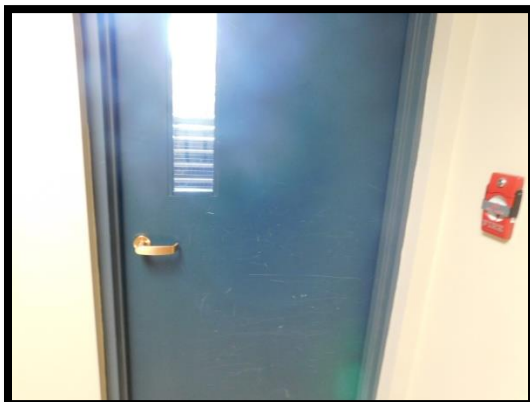


Photo Police 4



Photo Police 5

PEARLE L. CRAWFORD MEMORIAL LIBRARY

Function and Description of Facility and Programs: The Pearle L. Crawford Memorial Library was constructed in 2010 at the location of the former Town Hall on Schofield Avenue. The building is a one-story wooden framed structure with an ample meeting room, a children's area, young adult area, and an adult area and reading room. The library has over 45,000 items, over 6,900 cardholders, and in fiscal year 2019 circulated more than 67,000 items. The Pearle L. Crawford Memorial Library is a member of the C/WMARS network and uses the network's Evergreen ILS. The Library also participates in the Massachusetts Library System's delivery program, allowing its patrons to access materials from libraries throughout the state. The Library provides community members with access to informational, educational, and recreational resources in order to meet their cultural and social needs.



Responsible Party: Library Trustees

General Description or Obstacle Which Limits Mobility or Access: The exterior book return drop box is too high. The operating force of the high-low drinking fountain exceeds 5 lbs. A number of interior doors lack tactile designation signage or the signage is not mounted on the latch side of the door. The sink/counters in the FELS Community Room pantry, children's activity room, staff work area, and staff lounge all lack knee clearance. Dispensers and telephones in a # of locations throughout the library are too high. There is inadequate clear width as part of the interior accessible route in both the children's library and the adult reading area. The young adult room lacks accessible computer work stations. The men's and women's bathrooms have a number of non-compliant items including dispenser heights, height of coat hooks, location of toilet paper dispensers, stall doors that open in, and a urinal that is too high in the men's bathroom. The staff bathroom has a towel dispenser that is too high, a cabinet that restricts minimum clearance at the front of the water closet, and grab bars which are too high. The children's library bathroom appears to be designed for users from Grades 4 to 6 (521 CMR) or Age 9 – 12 (2010 ADA Standards) for most elements with the exception of the coat hook, toilet paper dispenser, and grab bars – all which need to be modified.

Pearle L. Crawford Memorial 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>
Book Return Slot The book return drop slot located near the main entrance to the building is 3" too high under the 2010 ADA Standards. See Photo Library 1.	308.2 308.3	6.5 6.6	Modify or replace the return drop slot so that it is no more than 48" a.f.f.	2	3	I	Up to \$350
Drinking Fountain The control buttons (2) have an operating force of 7 lbs.	309.4	36.5	Adjust the control buttons such that the operating force for both the high and low fountains do not exceed 5 lbs.	2	3	I	\$100
Interior Doors The bathroom doors (staff, men's, women's, children's room) and the children's activity room door do not fully comply with the maximum allowed operating force for an interior door (5 lbs.) and the minimum closing speed requirement of 6 seconds. Operating forces for the bathroom doors vary up to 15 lbs. and closing speeds are as quick as 4 seconds.	404.2.8 404.2.9	26.8 26.9	Adjust door closers such that the push/pull force does not exceed 5 lbs. with door closing speeds of at least 6 seconds.	3	2	I	\$0
Signage The following interior doors lack tactile accessible signage: <ul style="list-style-type: none"> Lobby door to pantry Meeting room door to children's room Meeting room door to exit Children's room closet door Story and craft room door Staff lounge door Young adult room door Work room door behind check-out counter Door from pantry to lobby The following signs are not on the latch side of the door: <ul style="list-style-type: none"> Quiet study #1 Quiet study #2 Children's librarian door Conference room/local history door The following sign is 2" too high: <ul style="list-style-type: none"> Children's room bathroom See Photos Library 2 and 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). Relocate signs to the latch side of the doors. Signage that is too high must be lowered to 60" a.f.f. to the centerline of the sign.	2	2	I	\$315
Kitchenettes/Sink Counters The counters and sinks in the FELS Community Room, children's activity room (2), staff employee work area, and staff employee lounge do not provide knee clearance. See Photos Library 4 and 5.	804.4 306.3	32.2 32.6 32.7	Modify the counters and sinks so that there is a minimum of 27" knee clearance at the sink with guarded, wrapped, or insulated piping. The children's sink (27" a.f.f. counter height) in the children's activity room should provide a minimum of 25" of knee clearance.	4	3	L	Up to \$2,000

<u>Dispensers, Telephones, and Coat Hooks</u> Dispensers, telephones, and coat hooks exceed the maximum reach range under the 2010 ADA Standards as follows: <ul style="list-style-type: none"> FELS Community Room telephone (54" a.f.f.) Children's Activity Room telephone (53½" a.f.f.) Children's Activity Room soap dispenser (43" a.f.f. over a 24" wide counter) Staff Work Room towel dispenser (42½" a.f.f. over a 24" wide counter) Staff Lounge towel and soap dispensers (42" a.f.f. over a 24" wide counter) Staff Lounge microwave 61" a.f.f. Staff Lounge coat rack 68" a.f.f. <p>See Photo Library 6.</p>	308.2 308.3	6.5 6.6	Lower the dispensers, telephones, and coat hook/rack (5% of total) to no more than 48" a.f.f. Provide a microwave on the staff lounge counter.	4	3, 2	N	Up to \$500
<u>Young Adult Computer Work Stations</u> All six (6) of the computer work stations are on tables that are 42¼" a.f.f. to the top, which is 8¼" to 14¼" too high. <p>See Photo Library 7.</p>	226.1 902.3	35.1 35.6	Relocate one (1) computer work station to a table that is between 28" to 34" a.f.f. to the top of the table and with at least 27" of knee clearance, 30" wide and 19" deep.	2	1	I	\$0
<u>Accessible Route Clear Widths</u> The book stacks in the fiction area of the children's area provides only 31" of clear width at the stacks due to a table. The adult periodical and reading area and the adult fiction/non-fiction reading area have only 18" and 30" of clear width between the wall and chairs. <p>See Photos Library 8 and 9.</p>	305 403.5	12.2 20.3	Move the table to achieve the required minimum 36" clear width Move/rearrange the chairs to achieve the minimum required 36" of clear width.	2	1	I	\$0
<u>Lobby Men's Bathroom</u> The paper towel dispenser is outside the zone of reach under 521 CMR by 6". The coat hook is 5½" too high under the 2010 ADA Standards. The water closet stall door opens in and not out as required. The urinal is 1 ¼" too high. <p>See Photo Library 10.</p>	308.2 308.3 604.8.1.2 605.2	30.12 6.5 6.6 30.6.1 30.10.1	Lower the dispenser to no more than 42" a.f.f. Lower the coat hook to no more than 48" a.f.f. Reverse the stall door so it swings out. Lower the urinal or replace it so that the top of the rim is no more than 17" a.f.f.	3 3 3 3	2 2 2 3	I I I I	\$0 \$0 \$100 Up to \$350

<u>Lobby Women's Bathroom</u> The paper towel dispenser is outside the zone of reach under 521 CMR by 6". The coat hook is 5½" too high under the 2010 ADA Standards. The water closet stall door opens in and not out as required. The toilet paper dispenser is 5½" o.c. from the front of the water closet. See Photo Library 11.	308.2 308.3	30.12	Lower the dispenser to no more than 42" a.f.f.	3	2	I	\$0
	308.2 308.3	6.5 6.6	Lower the coat hook to no more than 48" a.f.f.	3	2	I	\$0
	604.8.1.2	30.6.1	Reverse the stall door so it swings out.	3	2	I	\$100
	604.7	30.7.6	Relocate the dispenser. The toilet paper dispenser s/b 7" minimum and 9" maximum in front of the water closet measured to the centerline of the dispenser.	3	2	I	\$0
<u>Staff Bathroom</u> The paper towel dispenser is outside the zone of reach under 521 CMR by 9" and is located over the grab bar. The side and rear grab bars are 1" - 1½" too high. <i>Note: There are no tolerances allowed for a range of dimensions.</i> Due to a cabinet, the clearance in front of the water closet is only 31". See Photo Library 12.	308.2 308.3	30.12 30.8	Lower the dispenser to no more than 42" a.f.f. and to a location that is not over the grab bars.	3	2	I	\$0
	609.4	30.8	Lower the grab bars to a height of between 33" to 36" a.f.f. to the top of the gripping surface.	3	2	I	\$0
	604.3	30.7.2	Remove the cabinet to achieve the minimum required 42" of clearance from the front of the water closet to the nearest wall or fixture.	3	1	I	\$0
<u>Children's Bathroom</u> The paper towel dispenser is located over the grab bar and is 2" too high. The side and rear grab bars are 7½" - 9½" too high for a children's grab bar Age 9 – 12 or Grades 4 – 6. <i>Note: There are no tolerances allowed for a range of dimensions.</i> Due to a waste basket, the clearance in front of the water closet is only 36". The coat hook is 4" too high for a children's reach range. The toilet paper dispenser is 6" o.c. from the front of the water closet.	308.2 308.3	30.8 30.12	Relocate the dispenser so that it is not over the grab bars and is no more than 42" a.f.f.	3	2	I	\$0
	604.9	30.15.1	Lower the grab bars to a height of between 25" to 27" a.f.f. to the top of the gripping surface.	3	2	I	\$0
	604.3	30.7.2	Remove the waste basket to achieve the minimum required 42" of clearance from the front of the water closet to the nearest wall or fixture.	3	1	I	\$0
	308.1	NA	Lower the coat hook to a height of no more than 44" a.f.f.	3	2	I	\$0
	604.7	30.7.6	Relocate the dispenser. The toilet paper dispenser s/b 7" minimum and 9" maximum in front of the water closet measured to the centerline of the dispenser and at least 24" a.f.f.	3	2	I	\$0

Total up to \$3,815+

Pearle L. Crawford Memorial 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



Photo Library 11



Photo Library 12

DUDLEY FIRE STATION

Description of Facility and Programs: The Dudley Fire Department is a combination Career/Call Department providing fire suppression and emergency medical services to the town of Dudley and mutual aid services to the surrounding towns in Southern Worcester County (MA) and Northeastern Windham County (CT). The Department's mission is to protect life and property from fire or risk of fires, prevent fires from occurring in the town, control and extinguish fires when they occur, provide for emergency medical service and protect life, property, and the environment from the detrimental effects of hazardous materials. There are 10 career personnel including a fire chief, 1 assistant chief, 2 lieutenants, and 6 firefighters/EMTs. The call personnel includes a deputy chief, 1 captain and 4 companies inclusive of 4 lieutenants and 19 firefighters/EMTs/special technicians. There are also 12 on call EMTs, 1 trainee, and 5 special services personnel.



Responsible Party: Board of Selectmen.

General Description or Obstacle Which Limits Mobility or Access: The Fire Station is substantially compliant for those areas and levels which are open to the public with a number of minor exceptions. The designated accessible parking space lacks signage. The ornamental fire pull and the emergency box near the main entrance are protruding objects. The main entrance door and the interior doors with closers have operating forces and closing speeds that do not comply with the standards under 521 CMR or the 2010 ADA Standards. Interior doors with glass panes exceed the maximum height for viewing under the 2010 ADA Standards. A number of doors lack tactile designation signage. The lobby drinking fountain is not a "high-low" fountain. Phones and dispensers exceed the maximum reach range. The training room sink lacks adequate knee clearance and the counter is too high. The bathrooms near the training room (presumed to be for both public and staff use) have a number of non-compliant items relating to heights, operating force, and setbacks.

Garage/Apparatus Area. This area is limited to fire fighters with no public access. No further action is required at the present time.

Second Level. There is no vertical access to the second level and the existing stair railings are non-compliant (railings on one side only and no extensions). As this area is unfinished and storage only, no further action is required at the present time.

Administrative Offices; Firefighter/EMS Bathroom Facilities, Bunk Rooms, Fitness Room and Dayroom. These areas are limited to firefighters and emergency medical personnel, who must meet strict physical requirements which a person with a mobility limiting disability would not be able to perform.

Administrative Offices

The Administrative Offices have wall mounted phones that exceed the maximum reach range under the 2010 ADA Standards. As no public access is allowed to these areas, no further action or modifications are required at the present time. Modifications would only be required as a reasonable accommodation as may be required. This does not apply to the lobby, training room, and conference room (see below).

Firefighter/EMS Bathroom Facilities, Bunk Rooms, Fitness Room and Dayroom.

The bathrooms have minor areas of non-compliance which can be readily addressed at little to no expense (see below). In addition the showers are not accessible (7" vertical rise) and lack maneuverability; the bunk room phones are too high; the fitness room dispensers are too high and there is inadequate clear width between equipment; and the dayroom dispensers and phone are too high, the table and sink lack adequate knee clearance, and the sink piping is not fully wrapped. As no public access is allowed to these areas, no further action or modifications are required at the present time. Modifications would only be required as a reasonable accommodation as may be required.

Fire 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 designated accessible parking space lacks signage. See Photo Fire 1.	502 703.7.2	23	Provide accessible parking signage. The signage must be set such that the height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" a.f.f. at the top (MAAB 521 CMR) and located no more than 10' in front of the space.	1	2	I	\$75
Protruding Objects The exterior ornamental fire pull and the exterior emergency box are 48" a.f.f. and 39" a.f.f. respectively to the bottom of each item and protrude 6" into the accessible route of travel which exceeds the maximum of 4" into the accessible route of travel between a height of 27" and 80" a.f.f. See Photos Fire 2 and 3.	307.2	20.6.1	Erect wing walls on the exterior of the building below the fire pull and emergency box at a height of no more than 27" a.f.f. for cane detection.	1	3	I	Up to \$350

Exterior and Interior Doors The 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.) and the minimum closing speed requirement of 6 seconds under 521 CMR. Operating forces vary up to 18 lbs. and closing speeds are as quick as 3 seconds. The following doors are in non-compliance: Main entrance (exterior), interior lobby, doors to apparatus bays, training room (3), hall door to bunks, day room, fitness room, men's bathroom near training room, women's bathroom near training room, individual bunk room doors, bathrooms near bunk rooms.	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	2	I	\$100
Door Signage Tactile designation signage is not provided at the following: <ul style="list-style-type: none"> Door to second level storage, doors to apparatus bays (3), hallway storage room. In addition, the tactile designation signage for the Assistance Chief's Office is 5 ½" too high. See Photo Fire 4.	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). Lower the signage for the Assistance Chief's Office to 60" a.f.f. to the centerline of the sign.	2	2	I	\$175
Doors with Glass Panes Thirteen (13) doors have glass panes of 44½" a.f.f which exceeds the maximum viewing height of 43". These are as follows: apparatus doors (2), laundry room, radio room, door from the lobby to the station, EMS, corridor, conference room, training room (3), fitness, Asst Chief/plan review. See Photo Fire 4.	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. At a minimum, public access doors including the door from the lobby to the station, corridor door, conference room, and the training room (3) should be addressed. Options include a) seeking a variance to keep the doors "as is"; b) frosting or blocking the glass panes; or c) modify the doors to comply with the maximum height restriction of 43" a.f.f.	4	3	L	\$0 to \$1,800
Lobby Telephone The lobby telephone to contact departmental personnel is 9½" too high to activate operational buttons. See Photo Fire 4.	308.2 308.3	6.5 6.6	Lower the telephone so that the operational buttons are no more than 48" a.f.f. under the 2010 ADA Standards.	2	3	I	Up to \$150
Drinking Fountain The drinking fountain is non-compliant as it is not a "hi-low" fountain. See Photo Fire 5.	211	36.1.1	Option #1 – Discontinue use of the existing drinking fountain. Option #2 – remove the existing drinking fountain and replace with a "hi-low" drinking fountain. The drinking fountain must comply as follows: Protruding objects compliance of no > 4" protrusion between 27" and 80" a.f.f. (307); 30"x48" clear space	4	3	N	\$0 to \$3,350

			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).				
Conference Room and Training Room Telephones The telephones exceed the maximum reach range under the 2010 ADA Standards by 6" to 9".	308.2 308.3	6.5 6.6	Lower the telephones so that the operational buttons are no more than 48" a.f.f. under the 2010 ADA Standards.	2	3	I	Up to \$450
Training Room Sink/Counter The kitchenette sink provides only 24" of knee clearance. The soap dispenser exceeds the maximum reach range under the 2010 ADA Standards by 3¼". See Photo Fire 6.	306.3 308.2 308.3	32.6 6.5 6.6	Modify the apron of the sink counter to achieve a minimum of 27" a.f.f. Lower the soap dispenser so that it is no more than 48" a.f.f. under the 2010 ADA Standards.	2 2	2 2	I I	\$50 \$0
Bathrooms <u>Men's/Women's Bathrooms near Training Room and Accessible Bathroom near Bunk Rooms</u> The paper towel and soap dispensers are outside the zone of reach under 521 CMR by 8" to 12". The side and rear grab bars are ¼" to ½" too high. <i>Note: There are no tolerances allowed for a range of dimensions.</i> The toilet paper dispensers are 11" to 15" o.c. from the front of the water closet. <u>Men's/Women's Bathrooms near Training Room Only</u> The metered sink faucets remain open for only 3 to 7 seconds and not the minimum required 10 seconds. <u>Men's Bathroom near Training Room and Accessible Bathroom near Bunk Rooms Only</u> The paper towel dispensers are protruding objects as they extend more than 4" into the accessible route of travel between a height of 27" and 80" a.f.f.	308.2 308.3 609.4 604.5 604.7 606.4 307.2	6.5 6.6 30.8 30.7.6 30.9.6 20.6.1	Lower the dispensers to no more than 42" a.f.f. Lower the grab bars to a height of between 33" to 36" a.f.f. to the top of the gripping surface. Relocate the dispensers. Toilet paper dispenser s/b 7" minimum and 9" maximum in front of the water closet measured to the centerline of the dispenser. Adjust the sink faucet so that the faucets remain open for at least 10 seconds. Relocate or place a fixed object under the dispensers	3 3 3 3	2 2 2 2	I I I I	\$0 \$0 \$0 \$0 \$0

Up to \$6,500+

Fire Station Accessibility Assessment Photos



Photo Fire 1



Photo Fire 2



Photo Fire 3

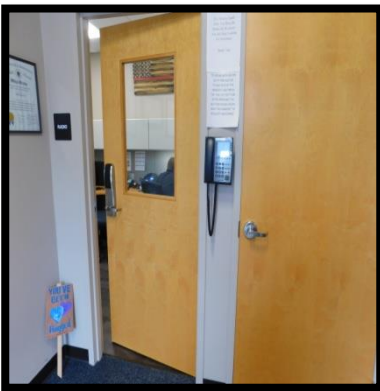


Photo Fire 4



Photo Fire 5

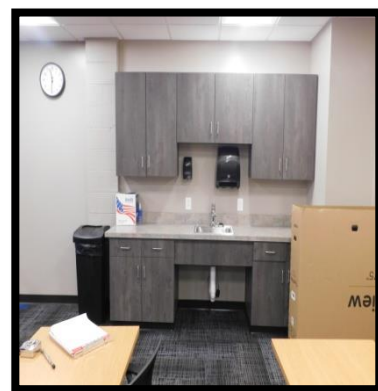
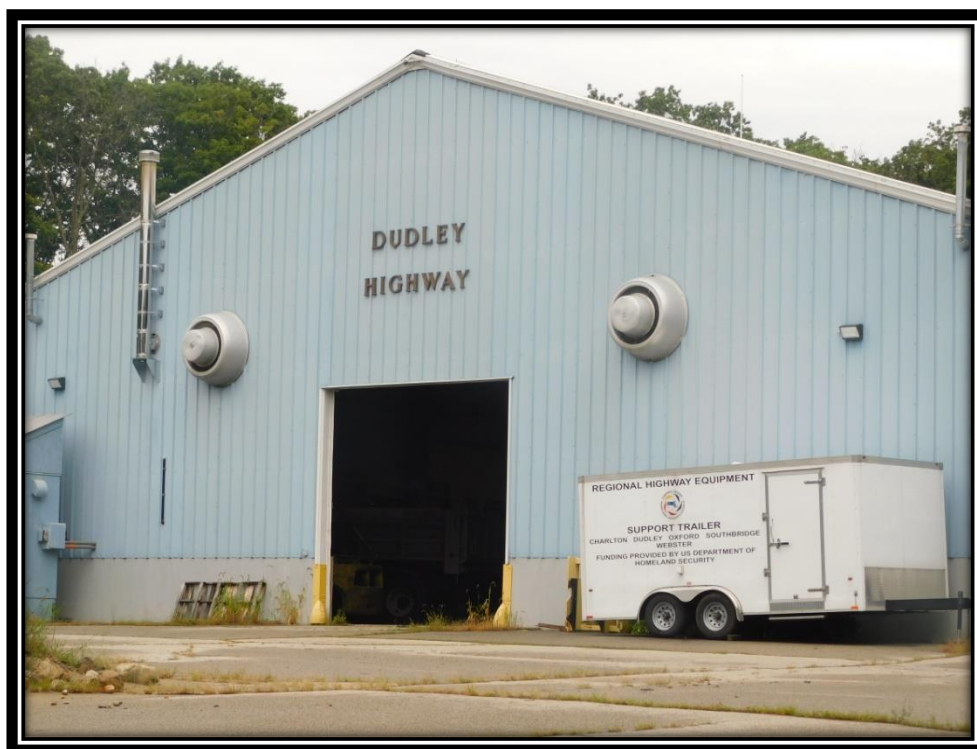


Photo Fire 6

HIGHWAY GARAGE

Description of Facility and Programs: The Highway Garage serves as the office of the Highway Superintendent as well as storage for department trucks, vehicles and related equipment. Although the public has access to the building and superintendent's office, all permits and related public business is conducted at the Municipal Office Building.



Responsible Party: Board of Selectmen

General Description or Obstacle Which Limits Mobility or Access: The one-story building consists of the highway superintendent's office, the foreman's office, 2 bathrooms, an employee break room, and an accompanying garage. The garage area is not open to the general public. The facility lacks designated accessible parking. The main entrance is locked and not used with access occurring at the side of the building. No formal directional signage exists. The side entrance has a 1" abrupt change in level surface at the door threshold. Door hardware is non-compliant and doors lack tactile designation signage. The sole meeting table in the employee break room lacks adequate knee clearance. The apparent "accessible" bathroom for public use has numerous areas of non-compliance.

Interior controls, switches, and phones, exceed maximum reach height. Interior doors have knob hardware and lack tactile signage and 2 doors have glass panes in excess of 43" a.f.f. The counter/sink in the employee break area is too high and the piping is not wrapped, insulated, or guarded. The apparent "employee" bathroom in the break room is wholly non-compliant and provides minimal maneuverability. As all highway personnel must meet strict physical requirements which a person with a mobility limiting disability would not be able to perform, unless the current practices and policies change and current non-public interior spaces are open to the general public, physical modifications would primarily be limited to parking and building access, door hardware, the "public" bathroom, the

meeting room table, and signage as described below. Other modifications would only be required as a result of a reasonable accommodation.

Highway Garage 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>Directional Signage</u> Outside directional signage at the front of the building/entrance directing visitors to the accessible entrance is not provided.	216	41.1.3	Provide directional signage noting the accessible entrance.	1	2	I	Up to \$100
<u>Parking</u> There is no designated accessible parking space inclusive of access aisle and signage. The designated accessible parking space must also be van accessible. See Photo Highway 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' with and 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	I	Up to \$150
<u>Building Access</u> A roughly 1" height differential occurs from the ground to the threshold of the side entrance door which exceeds that allowed by ½". See Photo Highway 2.	206 403 404.2.5	20 22 26.10	Modify the threshold so there is a no greater than ½" level surface change at the entrance.	1	2	I	Up to \$100
<u>Side Entrance Door Operating Force/Closing Speed</u> The side entrance door does not comply with the minimum closing speed requirement of 6 seconds or the maximum operating force of 15 lbs. for an exterior door.	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 15 lbs. for an exterior door.	1	2	I	\$0
<u>Door Signage</u> Tactile designation signage is not provided at the 9 interior building doors.	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	\$315
<u>Door Hardware</u> The side entrance door and 6 interior doors have knob-style hardware. See Photo Highway 3.	404.2	26.11	Install lever-style or similar accessible compliant hardware on the side entrance and 6 interior doors.	1, 2	2	I	\$525
<u>Table Knee Clearance</u> The meeting table in the employee lounge does not provide the minimum required 27" of knee clearance.	226.1 306.3	35	Block the table a minimum of 3¼" to achieve 27" of knee clearance.	2	2	I	\$50

Accessible Bathroom The sink faucet is non-compliant as it requires pinching and twisting of the wrist. The sink piping is not wrapped or guarded. The mirror is 9½" too high. The towel dispenser is 6" too high under the 521 CMR Standards. The water closet is 1½" too close to the near wall and 5" too close to the wall in front of the water closet. The flush valve of the water closet is on the near side and not the approach or wide side. The rear grab is only 24" long and the side grab bar is only 36" long and not the required 42" in length. The side grab bar is 30½" a.f.f. which is 2½" too low and the rear grab bar is 32½" a.f.f. which is ½" too low. <i>Note: There are no tolerances for ranges and minimums/maximums.</i> See Photo Highway 4.	309	30.9.6	Replace the faucet hardware with lever style or other compliant hardware that can operated with a closed fist.	3	3	N	\$175
	606.5	30.9.5	Wrap, guard, or insulate the piping.	3	2	N	\$50
	603.3	30.11	Lower the mirror so that it is no more than 40" a.f.f. to the bottom of the reflecting surface.	3	2	N	\$0
	308.2 308.3	6.5 6.6	Lower the towel dispenser to no more than 42" a.f.f.	3	2	N	\$0
	604.2 604.3	30.7.2	Seek a variance for the front setback due to the impracticality of extending the size of the bathroom. Modify the water closet so it is 18" a.f.f. from the near wall.	3	3	N	Up to \$750
	604.6	30.7.5	Modify/replace the water closet so the flush valve is on the approach or wide side.	3	3	N	See above
	604.5	30.8	Seek a variance for the length of the rear grab bar due to the limited wall space and replace the side grab bar with one that is 42" in length.	3	2	N	\$150
	609.4	30.8.2	Raise the grab bars so that they are between 33" to 36" a.f.f. to the top of the gripping surface.	3	2	N	\$0

Total up to \$2,365



Photo Highway 1



Photo Highway 2



Photo Highway 3

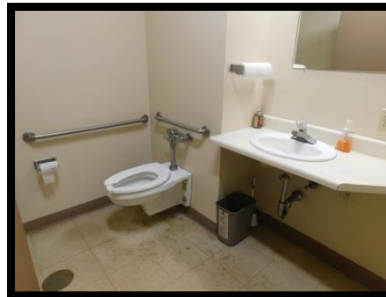


Photo Highway 4

ANIMAL CONTROL BUILDING

Description of Facility and Programs: The Animal Control Building serves primarily as a kennel for animals (primarily dogs and cats) that are stray or have been abandoned. The Animal Control Department enforces Dudley Town By-laws and Massachusetts General Laws relating to animals and manages the town dog kennel. The Department also seeks public assistance through donations to find homes for abandoned animals and provide care for animals needing medical assistance. The small one-story masonry structure is only open when the Animal Control Officer is at the facility and is kept secured at all other times so public access is limited and controlled.



Responsible Party: Board of Selectmen/Animal Control Officer.

General Description or Obstacle Which Limits Mobility or Access: The Animal Control Building is secured with access limited to arrangements through the Animal Control Officer. There is no designated accessible parking at the building. The paved "accessible route" to the building is uneven due to heaving and there is a 1" abrupt change in level surface at the entrance threshold. The entrance door has knob-style hardware.

Apart from being able to view animals being held for pick-up or adoption, the building is limited to employees only. There are no public bathrooms or sitting areas in the building. The existing employee bathroom and animal wash/sink area not in accordance with accessibility standards. As the Animal Control Officer must meet strict physical requirements which a person with a mobility limiting disability would not be able to perform and unless the current practices and policies change and interior spaces are open to the general public, physical modifications would be limited to parking, the exterior accessible route of travel, and door hardware as described below.

Animal Control 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 designated accessible parking space inclusive of access aisle and signage. The designated accessible parking space must also be van accessible. See Photo Animal Control 1.	502 703.7.2	23	Resurface, 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' with and 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. The slopes should not exceed 2% in any direction.	1	3	N	Up to \$1,350
<u>Animal Control Access</u> The accessible route to the building is uneven with heaving, cracks, and sunken areas of pavement. A roughly 1" height differential occurs from the ground to the threshold of the entrance door which exceeds that allowed by ½". See Photos Animal Control 1 and 2.	206 403 404.2.5	20 22 26.10	Resurface the existing route of travel to the entrance to create an accessible walkway that is even with no changes in level surface and a no greater than ½" level surface change at the entrance.	1	3	N	Up to \$350
<u>Entrance Door</u> The entrance door has knob-style hardware.	404.2	26.11	Install lever-style or similar accessible compliant hardware on the front door.	1	2	I	\$75

Total up to \$1,775



Photo 1: Animal Control



Photo 2: Animal Control

TRANSFER STATION

Function and Description of Facility and Programs: The Highway Department currently oversees the collection and disposal of refuse at the town transfer station. The facility is open 2 days per week to residents only of the Town of Dudley. Permit stickers are available at the Dudley Municipal Office Building for disposing of household trash, recycling, and for grass and leaves. Services include assisting residents deposit trash and recyclables into proper containers as well as hauling trash and recyclables to disposal sites. The facility consists of an employee only building and various roll-off containers and bins for disposal or donation of items. A small “take it or leave it” building also exists on site.



Responsible Party: Highway Department

Description or Obstacle Which Limits Mobility or Access: There are no “public” buildings located at the transfer station. There are also no designated accessible parking spaces. [See Photo Transfer 1.](#)

The “site office” can be accessed by stairs only and has knob-style hardware. The stair railings to the building are non-compliant as they do not extend at the bottom of the stairs and are provided on only one side of the stairs. [See Photo Transfer 2.](#) Similarly the adjacent door to access the lower level housing equipment has hardware which requires twisting of the wrist as well as open risers and non-compliant railings. [See Photo Transfer 3.](#) As these areas are limited to DPW personnel who must meet strict physical requirements which a person with a mobility limiting disability would not be able to perform, no further action or modifications are required to these areas at the present time, unless as required through a reasonable accommodation request.

The disposal bins are within acceptable reach range, but the book drop bin and “Planet Aid” bins exceed the 48” maximum reach range under the 2010 ADA Standards by up to 22” as well as an operating force in excess of 5 lbs. If feasible, bins with a drop opening of no higher than 48” should be provided. [See](#)

Photo Transfer 4. The trash compactor has a roughly 6” vertical rise to access and dispose of trash. As the construction of a ramped approach would interfere with accessing “employee only” portions of the building, an area should be designated for placing trash with employees disposing of in the trash compactor.

Highway personnel are available during regular transfer station hours to provide assistance as needed. Unfortunately, there is no signage at the facility to note that residents should contact the attendant if needed. It is recommended that uniform signs 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 and where trash should be left to be placed in the trash compactor for those who are unable to do so. This information should also be posted on the Highway Department’s website.

General Description of Obstacle	2010 ADAAG	MAAB 521 CMR	Type of Action to be Taken	P	F	TF	Cost Estimate
Parking There is no designated accessible parking space inclusive of access aisle and signage. The sole accessible parking space must also be van accessible.	502	23.4 23.6	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’ with and 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. The slopes should not exceed 2% in any direction.	1	2	I	\$250

Total up to \$250



Photo Transfer 1

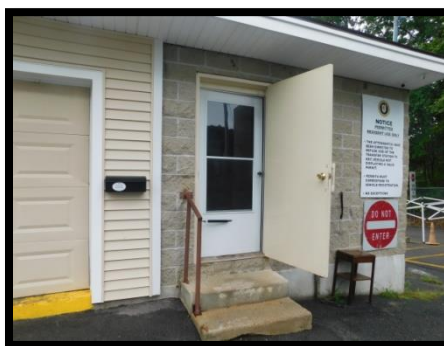


Photo Transfer 2



Photo Transfer 3



Photo Transfer 4

XIII. ACTIVE AND PASSIVE RECREATIONAL FACILITIES ASSESSMENTS

PREFACE

Active Recreational Facilities and Public Spaces

Passive Recreation and Conservation Areas

Walkways

Playgrounds

Active and Passive Recreational Areas Categories of Assessment

Active and Passive Recreational Facilities Accessibility Improvements Cost Estimates

CEMETERIES

TOWN BEACH

TOWN COMMON

ARDLOCK ACRES

NEW BOSTON ROAD/PETER AMORELLO, SR. MEMORIAL

BAKER POND ROAD

CRAWFORD FIELD

FUN ZONE PLAYGROUND

PINE STREET PARK

QUINEBAUG RIVER BIKEWAY SEGMENTS

STEVENS FIELD

SHEPHERD HILL REGIONAL HIGH SCHOOL

DUDLEY MIDDLE SCHOOL

DUDLEY ELEMENTARY SCHOOL

MASON ROAD SCHOOL

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.

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.

Active and Passive Recreational Areas Categories of Assessment

For the purposes of this assessment, Dudley’s active and passive recreation areas are divided into the following four (4) categories:

1. Conservation Areas
2. Passive Recreation Areas
3. Active Recreation Areas
4. School Recreational Facilities

Detailed assessments follow for Categories 2 – 4.

1. Conservation Areas

These properties are either “land locked”; have no improvements and serve solely as wildlife habitat, flood plain, or watershed land; or are off limits to the public. This includes the following sites:

- Shepherd Hill Estates
- Perryville Estates
- Tobin Farm Estates
- Hayden Pond Road
- Pierpont Road
- Low Pond
- Indian Road
- New Boston Road
- Schofield Road
- Oxford Avenue
- Water Department Pumping Station

No other action is required at these facilities.

2. Passive Recreation Areas

These properties have minimal improvements which may or may not include parking, kiosks, signage, and/or unimproved trail or water access:

- New Boston Road/Peter Amorello Sr. Memorial
- Ardlock Acres
- Baker Pond Road
- Town Common
- Cemeteries

3. Active Recreation Areas

These properties have a variety of formal site amenities which may or may not include parking, benches, picnic tables, improved walkways, playing and/or practice fields, play equipment, basketball courts, tennis courts, bathroom facilities including portable toilets, concession facilities, and other amenities. This includes the following sites:

- Crawford Field
- Town Beach
- Fun Zone Playground
- Pine Street Park
- Quinebaug River Bikeway Segments
- Stevens Field

4. School Recreational Facilities

These are school related fields, playgrounds, and related amenities, structures, and buildings. This includes the following sites:

- Shepherd Hill Regional High School

- Dudley Middle School
- Dudley Elementary School
- Mason Road School

Active and Passive 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.

CEMETERIES (Town-wide)

Function and Description of Facility and Programs: Burial grounds for the deceased. There are three (3) town cemeteries in Dudley. These are as follows: Center Cemetery, Corbin Cemetery, and Waldron Cemetery. Center Cemetery is located on Center Road; Corbin Cemetery is located on Corbin Road; and Waldron Cemetery is located on Ramshorn Road. None of these cemeteries offer direct services to the public. Both Corbin and Waldron Cemeteries have interior roads for vehicular access whereas Center Cemetery does not.

Center Cemetery



Corbin Cemetery



Waldron Cemetery



Responsible Party: Cemetery Commission

General Description or Obstacle Which Limits Mobility or Access: There is no dedicated public access or accessible routes to these areas. In fact, Center Cemetery offers no formal public access to its interior having no walkways or roadways. Although Corbin and Waldron Cemeteries do not have walkways within their interiors, they both have roadways allowing vehicular access via asphalt and gravel/stone road surfaces. As a result, these cemeteries and their gravestones can be viewed from the inside of a motor vehicle. 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. No physical modifications are required at the present time.

TOWN BEACH

Description of Facility: Water-based recreational area including bathrooms and changing rooms, a pavilion with 4 picnic tables, 1 bench, a basketball court, a playground area (6 swings and 3 play components), 3 grilling stations, a bike rack, and 5 trash receptacles.



General Description or Obstacle Which Limits Mobility or Access: There is no designated accessible parking. No accessible route of travel exists to any of the elements and activities at the beach including to the pavilion and picnic tables, bathrooms, bench, basketball court, playground, grilling stations, bike rack, trash receptacles, and the beach itself. The picnic tables do not provide the minimum required knee depth. The bathrooms are wholly non-compliant as the ramped approach into the building is in excess of 14%; there is no tactile designation signage; there is inadequate clear widths and maneuvering clearances in both the water closet and changing stalls; the sink piping is not wrapped or guarded and the faucets require twisting of the wrist; dispensers and coat hooks are too high; the water closets lack compliant grab bars; the men's urinal is too high; and other various elements.

Town Beach 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>
Parking There is no designated accessible passenger vehicle or van accessible parking at the beach. See Photo Town Beach 1.	502 703	23	Create a van accessible parking space and a passenger vehicle accessible parking space. To accommodate both types of spaces, stripe and designate a van accessible parking space and a passenger vehicle accessible space at widths of 8' with a shared 8' access aisle. Van accessible signage must be provided. Accessible designation 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 in front of the space; slopes should not exceed 2% in any direction. The surface of the parking spaces and access aisles must be stable, firm, and slip resistant and can be compacted stone dust (if properly installed and maintained), asphalt, or concrete.	1	3	N	Up to \$4,500
Accessible Route of Travel There is no accessible route of travel to the bathrooms/changing area, pavilion and picnic tables, bench, basketball court, playground, grilling stations, bike rack, trash receptacles, and the beach itself. The berm for the drainage swale acts as an additional impediment. See Photos Town Beach 2, 3, and 4.	403	19 20 22	There needs to be an accessible route to all programs and services. Currently the route of travel leading to the beach and related amenities is non-compliant as the route is not firm, stable, and slip resistant. Surfaces vary and include grass, deteriorated asphalt, and sand. The accessible route does not have to be paved but it needs to be maintained. The accessible route could consist of different types of surfaces. Hard packed and maintained stone dust, asphalt, or other firm material could be used to provide an accessible route of travel to the pavilion/picnic tables, bench, playground, basketball court, grilling stations, bike rack, and trash receptacles. A switch-back ramp could be constructed to access the lower beach area with an accessible roll-out matting to access the water. Due to the slope issues, a design professional would need to be engaged to determine the most feasible, practical, and cost effective alternatives.	2, 3	4	L	TBD
Bench There is no level surface area for a wheelchair at the bench.	221.2 802.1	14 19	Create an approach and wheelchair companion area at one of the benches that are on an accessible route of travel. 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.	1	3	N	Included in above.
Bathroom Access The bathrooms are not on an accessible route due to the 14.4% sloped access into the building. See Photo Town Beach 5.	403	22	Construct an approach that does not exceed 5% in running slope.	3	3	N	Included in above.
Picnic Tables None of the four (4) existing picnic tables provide the required accessible knee/toe depth.	226.1 902	19	At least 5% or at least one table must be accessible. Purchase one accessible picnic table. The table surface s/b 28" to 34" a.f.f. to the top surface with at least 27" knee clearance, 30" clear width, and 19" depth.	2	2	N	\$750
Playground and Swings Non-compliant sand/grass/dirt is the ground surface treatment for the swings and playground.	402 1008.2	19.7 20.0 14 19	Construct an accessible route compliant with width and slope (2% cross, 5% running) requirements around the perimeter of the swings and playground area (4' wide minimum). The accessible route must be stable,	2	3	L	Up to \$7,500

			firm, and slip resistant. Construction options include compacted stone dust, asphalt, concrete, poured in place products, etc. Costs will vary depending on product used. At least one swing should be accessible. Play area ground surfaces must comply with ASTM F 1951 and ASTM F 1292.				
Men's and Women's Bathrooms							
There is no tactile designation signage at the entrances or at the storage room doors.	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).	3	2	I	\$140
The storage room doors have non-compliant knob style hardware.	404.2	26.11	Install lever-style or similar accessible compliant hardware on the storage doors.	4	2	N	\$150
The soap and towel dispenser's are 4" to 12" too high under 521 CMR. In addition, the towel dispensers protrude 9 1/2" into the accessible route of travel.	308.2 308.3 307.2	30.12 20.6.1	Lower the dispensers to a max. of 42" a.f.f. (521 CMR) and within the zone of reach. Relocate or place a fixed object under the towel dispensers.	3	2	I	\$0
The sink piping is not wrapped, guarded, or insulated.	606.5	30.9.5	Wrap or insulate piping.	3	2	I	\$100
The sink hardware is non-compliant as the faucets require pinching or twisting of the wrist.	309	30.9.6 39.5	Replace existing hardware with lever-style or self-metering faucets to comply with operable parts standards.	3	2	N	Up to \$300
The stall door coat hooks are 12" to 15" too high under the 2010 ADA Standards.	308.2 308.3	30.6	Lower the coat hooks to no more than 48" a.f.f.	3	2	N	\$0
The "accessible" stalls do not provide the minimum required water closet setbacks and maneuverability. The far wall setback is 23" too short in the women's bathroom and the clearance in front of both the men's and women's water closets is 15" to 17" too short.	604	30.7	Modify the bathroom stalls such that there is a minimum 18" clearance o.c. to the centerline of the water closet from the nearest sidewall; at least 42" from the farthest sidewall; and at least 42" clearance from the front of the water closet to the nearest wall or fixture.	3	3	N	Up to \$5,000
The water closets are 1" to 1 1/2" too low.	604.4 604.6	30.7.3 30.7.5	Replace the water closets with ones that are 17" – 19" a.f.f. to the top of the seat with the flush control on the wide or open side.	3	3	N	\$750
There is only one 36" grab bar on the side of the water closet at a height of 30" a.f.f.	609	30.8	Install 42" long grab bars on the rear and side of the water closets. The grab bars s/b 33" – 36" a.f.f. to the top of the gripping surface. The side grab bar s/b located no more than 12" from the interior corner and the rear grab bar no more than 6" from the interior corner.	3	2	N	Up to \$750
The locking mechanism on the stall door is not compliant as it requires pinching and twisting of the wrist. In addition, there are no pull devices on the women's stall door.	604 404	30.6	Replace the locking devices with ones that are easily operable with a closed fist. Install pull devices on both sides of the stall door.	3	2	N	\$100
The stall doors are not fully self closing. In addition, the women's stall door opens in, not out.	604.8 404.2	30.6	Modify or replace the closers so that the doors fully self-close. Reverse the women's stall door swing.	3	2	N	\$150

The toilet paper dispensers are 4" o.c. from the front of the water closet.	604.7	30.7.6 30.8.5	Relocate the dispensers so they are located 7" to 9" in front of the water closet measured to the centerline of the dispenser. The dispensers s/b at least 24" a.f.f. but no more than 48" a.f.f. and not mounted over the grab bars. There should be a minimum of 1½" clearance under the grab bars.	3	2	N	\$0
<u>Men's Bathroom Only</u> The urinal is 11½" too high and is obstructed with a platform.	605.2 308	30.10	Lower the urinal so that the rim is a maximum of 17" a.f.f. and the flush control is no more than 44" a.f.f. (521 CMR). Remove the platform.	3	3	N	Up to \$350
<u>Men's and Women's Changing Stalls</u> The stalls lack insufficient interior maneuverability and clear width. The entry width is 1" to 6" too narrow.	803 304 404	19 26	Modify the stalls to provide a 32" clear width at the entrance and either 36" x 60" "T" turning space or a 60" turning diameter.	3	3	N	Up to \$2,500
The curtain to provide privacy requires pinching and cannot be operated with a closed fist.	604 404	39	Replace the curtains with a door that is self-closing; has hardware that complies with operable parts (operable with closed fist), and pull devices on both sides of the door.	3	3	N	Included in above
The coat hooks are 9" – 12" too high under the 2010 ADA Standards.	308.2 308.3	6.5 6.6	Lower the coat hooks to no more than 48" a.f.f.	3	2	N	\$0
The benches are too short and too narrow.	903	19	Replace with bench seats that are a minimum of 42" long, 20" deep minimum to 24" deep maximum.	3	2	N	Up to \$500
See Photos Town Beach 6, 7, 8, 9, and 10.							

Estimated Total Cost: Up to \$23,540 (not including cost of constructing an accessible route of travel throughout the facility and to the beach which could exceed \$150,000+).

Town Beach Assessment Photos



Photo Town Beach 1



Photo Town Beach 2



Photo Town Beach 3



Photo Town Beach 4



Photo Town Beach 5

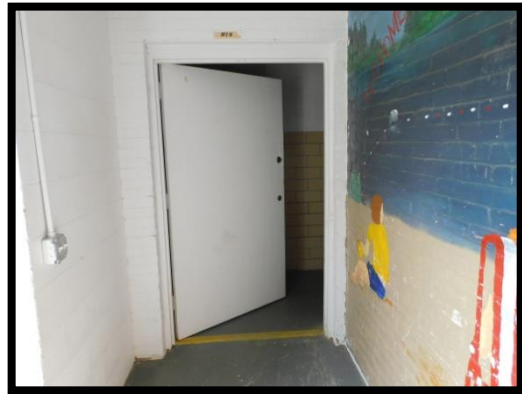


Photo Town Beach 6

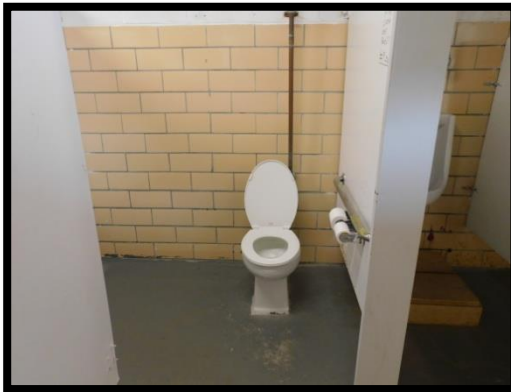


Photo Town Beach 7

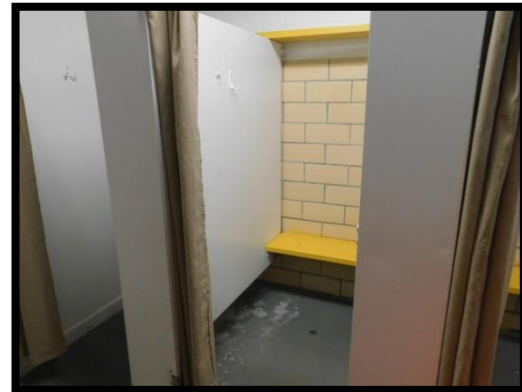


Photo Town Beach 8

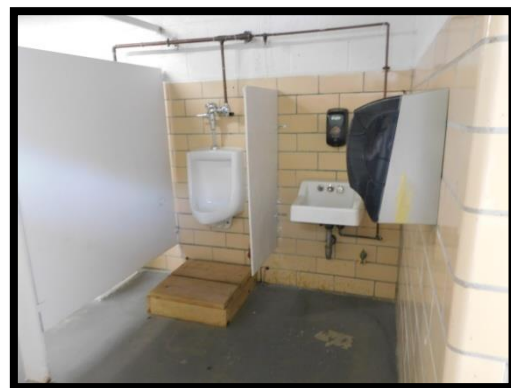


Photo Town Beach 9

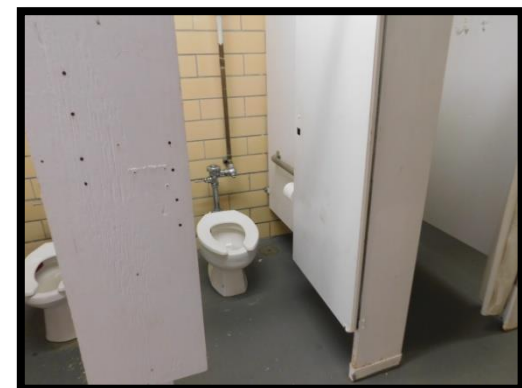


Photo Town Beach 10

TOWN COMMON (Dudley Segment)

Function and Description of Facility and Programs: The Dudley Town Common is located in the approximate center of town near the campus of Nichols College on Center Road. The common is relatively small and contains a flag pole, 3 war monuments (Revolutionary War, Civil War, World War I), and monuments to the founding fathers of Dudley and current and past towns people of Dudley. There are also 2 historical interpretive signs at the common near the flag pole. The common serves as a passive recreational area, green space, and location for civic events.



Responsible Party: Board of Selectmen

General Description or Obstacle Which Limits Mobility or Access: There is no accessible route of travel to and throughout the common to the flag pole, monuments, and historical interpretive signs. The area around the flagpole/towns people monuments/interpretive signage is large cobblestone creating an uneven surface with abrupt changes in level surface. *Note: This assessment addresses only the town-owned portion of the common and not that owned by Nichols College.*

Town Common 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>Accessible Route</u> An accessible route needs to be provided to the monuments, memorials, flag pole, and historical interpretive signage. Due to the use of large "cobble stone type" pavers around the flag pole/towns people monuments/interpretive signage, there are gaps between pavers and abrupt changes in level surface of greater than 1/4".	402 403	20.0 22.0	Construct an accessible route compliant with width (48" wide w/36" clear width) and slope (2% cross, 5% running) requirements throughout the common to the monuments, memorials, flag pole, and historical interpretive signage. Construction options can include compacted stone dust, asphalt, concrete, or similar surfaces that meet the requirement of stable, firm, and slip resistant with no abrupt changes in level surface. Costs will vary depending on material used.	1	3	N	Up to \$10K+

See Photos Town Common 1, 2, 3 and 4.			Infill the gaps between the pavers around the flagpole area to minimize and/or eliminate the abrupt changes in level surface. If this does not sufficiently reduce the gaps and level surface changes, consider replacing the cobble stone pavers in entirety with level pavers or concrete.				
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Total up to \$10,000+

Town Common Accessibility Assessment



Photo Town Common 1



Photo Town Common 2



Photo Town Common 3

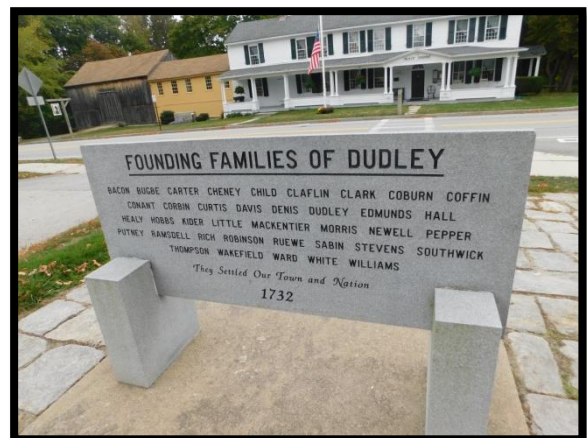


Photo Town Common 4

ARDLOCK ACRES

Description of Facility: A 90+ acre passive recreational facility with access off New Boston Road. The area is intended to remain in an undeveloped condition for the benefit of the environment and for public enjoyment.



Responsible Party: Conservation Commission

General Description or Obstacle Which Limits Mobility or Access: There are apparent trails on the site, but none are formally maintained to a standard that would be considered to be an accessible route of travel. The parking for the facility is an unimproved and unstable gravel surface and therefore non-compliant. No signage or striping is provided.

Recommended Action: Should the town initiate formal improvements to this property to enhance overall site accessibility and usage, then compliant accessible parking, signage, and limited accessible routes of travel would need to be provided. No action is required at the present time.

NEW BOSTON ROAD/PETER AMORELLO SR. MEMORIAL

Description of Facility: A passive recreational facility with access off Blue Heron Drive. The facility is actually located on the Quinebaug River Bikeway. The facility includes a kiosk, trash receptacle, bike rack, and signage. There is no parking at the site.



Responsible Party: Conservation Commission

General Description or Obstacle Which Limits Mobility or Access: The site lacks parking for vehicles. A kiosk, bike rack, and trash receptacle are not on an accessible route of travel. As noted above, the site is located on and adjacent to the rail trail surface. However, in its current state, the trail does not meet accessibility standards for wheelchair users or for those with other ambulatory issues.

Recommended Action: Should the town initiate formal improvements to this property to enhance overall site accessibility and usage, then compliant accessible parking, signage, and limited accessible routes of travel would need to be provided. No action is required at the present time.

BAKER POND ROAD

Description of Facility: A passive recreational facility with access off Baker Pond Road. The facility includes a canoe/kayak launch area and signage. There is no parking at the site.



Responsible Party: Conservation Commission

General Description or Obstacle Which Limits Mobility or Access: The site lacks parking for vehicles. Apart for the canoe and kayak launch area, there are no other amenities at this location.

Recommended Action: Should the town initiate formal improvements to this property to enhance overall site accessibility and usage, then limited accessible routes of travel would need to be provided. No action is required at the present time.

CRAWFORD FIELD

Description of Facility: A baseball/softball/ t-ball facility consisting of 5 fields, bleacher seating, a batting cage, a concession stand, bathroom facilities, picnic tables, a bench, and parking.



General Description or Obstacle Which Limits Mobility or Access: The 3 designated accessible parking spaces have excessive cross slopes, either lack signage or have signage that is too low, do not have a van accessible space, and the parking is not on an accessible route of travel to the field facility. The picnic tables lack knee depth. The lock box on the side of the building is too high. Both the lock box and electric panel/meter serve as protruding objects. No accessible route of travel exists to any of the elements and activities at the facility including to the bathrooms, picnic tables, bench, ball fields, batting cages, bleachers, and player's seating. Some of the dugouts have insufficient clear width or abrupt change in level surface to access. Chain link gates throughout the facility do not have a smooth surface at the base of the push side of the gate. The concessions stand has interior switches, outlets and dispensers that are too high. In addition the sink/counter is too high and lacks knee clearance. The bathrooms are wholly non-compliant as there is no tactile designation signage; both doors have knob-style hardware, there is inadequate clear width and maneuvering clearance in both bathrooms; the sink piping is not wrapped or guarded and the faucets require twisting of the wrist; dispensers are too high; the water closets lack compliant grab bars; and other related elements. The stairs from the elementary school parking lot to the facility have deteriorated and sunken landings, are not level, and lack extensions at the top and bottom of the railings. A 2-story building at Hero's Field was locked at the time of assessment. This building appears to contain a 2nd level "broadcast booth". It is assumed that there is access via stairs but no compliant vertical access to the upper level.

Crawford Field Accessibility Assessment

[illegible]

Picnic Tables None of the three (3) picnic tables provide the required accessible knee/toe depth. <i>Note: One picnic table is located near the concession stand and 2 picnic tables are located near Hero's Field.</i>	226.1 902	19	At least 5% or at least one table must be accessible at each separate location. Purchase 2 accessible picnic tables – one for the concession area and one for Hero's Field. The table surface s/b 28" to 34" a.f.f. to the top surface with at least 27" knee clearance, 30" clear width, and 19" depth.	2	2	N	\$1,500
Deposit Lock Box The deposit lock box located at the side of the building housing the bathrooms and concessions stand is 9" too high under the 2010 ADA Standards. See Photo Crawford Field 5.	308.2 308.3	6.5 6.6	Lower the drop box so that it is no more than 48" a.f.f.	2	2	I	\$0
Protruding Objects Both the deposit lock box and the electric meter/panel located at the side of the building housing the bathrooms and concessions stand protrude more than 4" into the accessible route of travel between a height of 27" and 80" a.f.f. See Photo Crawford Field 6.	307.2	20.6.1	Place fixed objects under both for cane detection.	2	2	I	\$0
Entrance Gate Chain link gates to the batting cages, fields, pitching warm-up area, dugouts/player's seating (16 total) 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 Crawford Field 7.	404.2	NA	Remove gates or install smooth plating at the base of the gates.	1	2	N	Up to \$1,600
Stair Railings The asphalt level landings between the concrete stairs are deteriorated with substantial heaving. The stairs have shifted and sunk and are not level. The railings lack extensions at the top and bottom of the stairs. Interior stair railings are non-compliant as they lack extensions at the top and bottom. See Photo Crawford Field 8.	504 505	27	Repair, modify, and/or reconstruct the stairs and landings to eliminate change in level surface and uneven stairs. Install extensions on the railings - at the top 12" parallel to the floor and the slope distance of one tread then 12" parallel to the floor at the bottom.	2	3	N	Varies – up to \$5,000
Hero's Field Broadcast Booth The broadcast booth was locked at the time of assessment. It is assumed that access to the second level can only be reached using stairs. If this is the case, then the recommended actions should be followed.	206 504 505 410	20 27 28	Provide railings that are continuous on both sides of the stairs; 34" to 38" a.f.f. to the top of the handrail; handrails circular x-section with 1½" to 2" outside diameter; handrails s/b round or oval in x-section; handrail extensions - top railing 12" parallel to the floor at the top and at the bottom, a slope distance of one tread then 12" parallel to the floor. Although the 2010 ADA Standards do allow for an "exception" requiring an accessible route to press boxes/broadcast booths that are free-standing, above	2	4	L	Up to \$75K+

			<p>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:</p> <p><i>Option 1: Discontinue use of the broadcast booth.</i></p> <p><i>Option 2: Seek a variance from the MAAB to not require the provision of an access route to the broadcast booth.</i></p> <p><i>Option 3: Install a vertical wheelchair lift or LULA to access the broadcast booth.</i></p>				
<p>Concession Stand</p> <p>The door to the garage from the concession stand lacks tactile designation signage.</p> <p>The clear width at the entrance is reduced to 33" due to the refrigerator.</p> <p>The sink is 2" too high and lacks knee clearance. The dispensers, outlets, and switches are up to 16" too high.</p>	<p>703.4</p> <p>403.5</p> <p>306 606 308.2 308.3</p>	<p>41.1</p> <p>20.3</p> <p>32 6.5 6.6</p>	<p>Provide tactile signage on the latch side of the door. Signage s/b 60" a.f.f. to the centerline of the sign.</p> <p>Move refrigerator to achieve the minimum required 36" clear width.</p> <p>Depending on usage - sink, dispenser, outlet, and switch modifications may be required as a result of a reasonable accommodation.</p>	<p>4</p> <p>4</p> <p>4</p>	<p>2</p> <p>2</p> <p>3</p>	<p>N</p> <p>N</p> <p>L</p>	<p>\$35</p> <p>\$0</p> <p>TBD</p>
<p>Men's and Women's Bathrooms</p> <p>There is no tactile designation signage at the entrances.</p> <p>The doors have non-compliant knob style hardware.</p> <p>The soap and towel dispenser's are 2" to 5" too high under 521 CMR and the light switches are 4" to 5" too high under the 2010 ADA Standards.</p> <p>The sink piping is not wrapped, guarded, or insulated.</p> <p>The sink hardware is non-compliant as the faucets require pinching or twisting of the wrist.</p> <p>The "accessible" stalls do not provide the minimum required water closet setbacks and maneuverability. The far wall setback is 23" too short in the <u>women's</u> bathroom and 18½" too short in the <u>men's</u> bathroom due to the location of the sink(s). Both the men's and women's water closets are 1½" too far from the near wall. The <u>men's</u> water closet is 2" too close to the wall in front of the water closet whereas the <u>women's</u> water closet is 11" too close to the wall in front of the water closet.</p>	<p>703</p> <p>404.2</p> <p>308.2 308.3</p> <p>606.5</p> <p>309</p> <p>604</p>	<p>41.1</p> <p>26.11</p> <p>30.12 6.5 6.6</p> <p>30.9.5</p> <p>30.9.6 39.5</p> <p>30.7</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>Install lever-style or similar accessible compliant hardware on the doors.</p> <p>Lower the dispensers to a max. of 42" a.f.f. (521 CMR) and within the zone of reach. Lower the light switches to no more than 48" a.f.f.</p> <p>Wrap or insulate piping.</p> <p>Replace existing hardware with lever-style or self-metering faucets to comply with operable parts standards.</p> <p>Modify the bathroom stalls such that there is a minimum 18" clearance o.c. to the centerline of the water closet from the nearest sidewall; at least 42" from the farthest sidewall; and at least 42" clearance from the front of the water closet to the nearest wall or fixture. This could be achieved by making both bathrooms unisex with the men's bathroom designated as the unisex accessible bathroom. The water closet will need to be relocated closer to the wall and the sink moved to achieve the far wall clearance. A variance would be needed for the required 42" clearance at the front of the water closet as only 40" is provided.</p>	<p>3</p> <p>3</p> <p>3</p> <p>3</p> <p>3</p> <p>3</p>	<p>2</p> <p>2</p> <p>2</p> <p>2</p> <p>3</p>	<p>I</p> <p>N</p> <p>N</p> <p>I</p> <p>N</p> <p>N</p>	<p>\$70</p> <p>\$250</p> <p>Up to \$300</p> <p>\$100</p> <p>Up to \$300</p> <p>Up to \$5,000</p>

The water closets are 2" to 4" too low. The <u>women's</u> water closet flush control is located on the near side of the toilet.	604.4 604.6	30.7.3 30.7.5	Replace the water closets with ones that are 17" – 19" a.f.f. to the top of the seat with the flush control on the wide or open side.	3	3	N	Up to \$750
There are no grab bars in either the men's or women's bathrooms.	609	30.8	Install 42" long grab bars on the rear and side of the water closets. The grab bars s/b 33" – 36" a.f.f. to the top of the gripping surface. The side grab bar s/b located no more than 12" from the interior corner and the rear grab bar no more than 6" from the interior corner.	3	2	N	Up to \$750
The locking mechanism on the <u>women's</u> door is not compliant as it is hard to lock and requires pinching and twisting of the wrist	404	30.6	Replace the locking device with one that is easily operable with a closed fist.	3	2	N	\$50
The toilet paper dispensers are 4" to 5" o.c. from the front of the water closet.	604.7	30.7.6 30.8.5	Relocate the dispensers so they are located 7" to 9" in front of the water closet measured to the centerline of the dispenser. The dispensers s/b at least 24" a.f.f. but no more than 48" a.f.f. and not mounted over the grab bars. There should be a minimum of 1½" clearance under the grab bars.	3	2	N	\$0
The door opening of the <u>women's</u> bathroom is reduced to 30" due to a locker behind the door. See Photos Crawford Field 9, 10, 11, and 12.	404.2.3 403.5	26.5 20.3	Remove the locker to achieve a minimum of 32" clearance at the door and 36" minimum clearance at the interior.	3	1	I	\$0

Estimated Total Cost: Up to \$238,205+

Crawford Field Assessment Photos



Photo Crawford Field 1



Photo Crawford Field 2



Photo Crawford Field 3



Photo Crawford Field 4



Photo Crawford Field 5



Photo Crawford Field 6



Photo Crawford Field 7



Photo Crawford Field 8

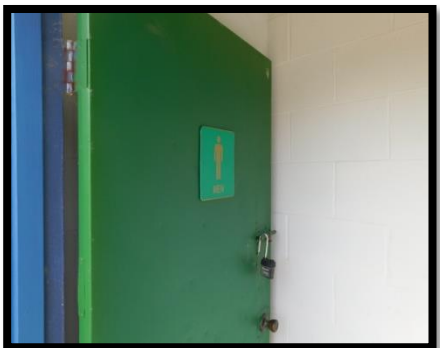


Photo Crawford Field 9



Photo Crawford Field 10

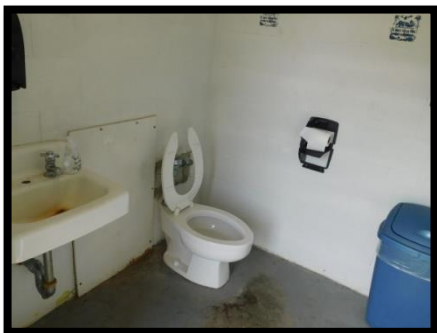


Photo Crawford Field 11

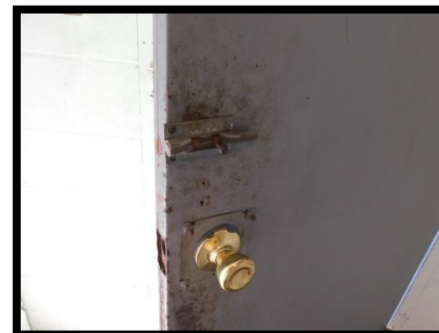


Photo Crawford Field 12

FUN ZONE PLAYGROUND (Municipal Office Complex)

Description of Facility: A small playground located at the Municipal Office Complex. The playground appears to have been created in 1993 and consists of a playground with swings, a playscape, ground components, and picnic tables.



General Description or Obstacle Which Limits Mobility or Access: There is no designated accessible parking for the playground area. There is no accessible route to the playground as the transition from the parking lot to the sidewalk has a 7" curb. The playground lacks accessible play components. The entry gate does not have a smooth surface at the base. The gate closing/opening device is hard to fully operate with a closed fist. The rubberized surface for the playground area has areas of deterioration and should be repaired to maintain a level surface with no abrupt changes. **See Photo Fun Zone 1.** Although the rubberized surface meets the criteria for accessible route within the play area, it should be tested for compliance with ASTM F 1951 and ASTM F 1292. The playscape, swings, and ground components do not meet accessibility standards. Accessible play equipment should be considered when feasible.

Fun Zone Playground Accessibility Assessment

Parking There is no designated accessible parking.	502 703.7	23	Create a minimum of one van accessible space as follows: stripe and designate a van accessible parking space with van accessible signage. The van space s/b at a width of 8' with an 8' 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; slopes should not exceed 2% in any direction.	1	3	N	Up to \$150
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<u>Accessible Route</u> No accessible route exists to the playground due to a 7" curb and the lack of a curb cut and curb ramp. See Photo Fun Zone 2.	403 405 406	21	Install a curb ramp in accordance with the specifications as detailed in the Sidewalks and Curb Ramps Section. At a minimum the curb ramp s/b at least 36" wide exclusive of sides, have no more than an 8.3% running slope, and a 48" long level landing.	1	3	N	Up to \$1,500
<u>Chain Link Gates</u> The chain link gate to the playground does 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 opening/closing latch for the gate to the playground can be opened with a loose grip or closed fist but cannot be closed without pinching and twisting of the wrist. See Photo Fun Zone 3.	404.2 404.2 309.4	NA 26.11 39.5	Remove the gate or install smooth plating at the base of gate. Adjust the latch so it can be closed with one fist or replace the latch mechanism.	1 1	2 2	I I	Up to \$100 \$0 to \$100
<u>Picnic Tables</u> None of the three (3) existing picnic tables provide the required accessible knee/toe depth. One of the picnic tables lacks adequate knee clearance (height). See Photo Fun Zone 4.	226.1 902	19	At least 5% or at least one table must be accessible. Purchase one accessible picnic table. The table surface s/b 28" to 34" a.f.f. to the top surface with at least 27" knee clearance, 30" clear width, and 19" depth.	2	2	N	\$750

Estimated Total Cost: Up to \$2,600

Fun Zone Playground Assessment Photos



Photo Fun Zone 1



Photo Fun Zone 2

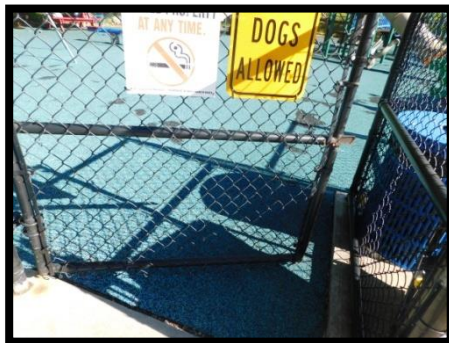


Photo Fun Zone 3

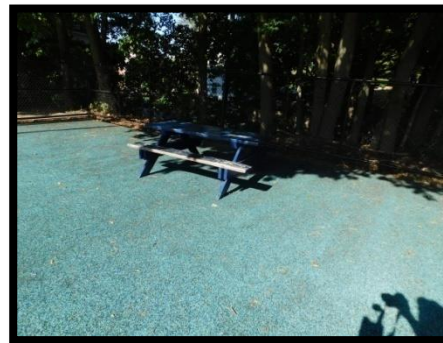


Photo Fun Zone 4

PINE STREET PARK

Description of Facility: A small, neighborhood recreation area consisting of a basketball court and 2 benches.



General Description or Obstacle Which Limits Mobility or Access: The parking is not striped as van accessible and the designated space and access aisle have excessive running slopes. There is no accessible route to the basketball court as the last 50 feet have running slopes that vary up to 11.4% and there is a 7" abrupt change in level surface to access the court. The cross slopes of the walkway to the benches are in excess of 2.0% and there is no level wheelchair space at either of the benches.

Pine Street Park 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 cross slope of the designated accessible parking space and access aisle approach 5.9% which exceeds the maximum of 2.0%.	502	23	Reconstruct and resurface the accessible parking area so that the slopes do not exceed 2% in any direction.	1	3	L	Up to \$2,500
The designated accessible parking space is striped at 10½' in width and the access aisle at 5' wide which does not meet the standard for vans.	502 703.7	23	Stripe and designate a van accessible parking space at a width of 8' with an 8' access aisle.	1	3	L	\$150
<u>Accessible Route</u> No accessible route exists to the basketball court and benches as the last 50' of the accessible route of travel has a running slope that varies up to 11.4%; the accessible route to the	303 402 403 802.1	20 22 14	An accessible route of travel needs to be provided to the basketball court. Reconstruct the approximately upper 50' of the existing walkway to adhere to the maximum running slope requirement of 5% without railings. In addition, the sidewalk adjacent to the basketball court to	1	3	L	Up to \$10,000

<p>closest bench has a cross slope of more than 3.0%; and the basketball court is 7" below grade from the adjacent sidewalk with no means of compliant access.</p> <p>In addition, there is no adjacent level wheelchair space at the bench.</p> <p>See Photos Pine Street Park 1 and 2.</p>	802.1	14	<p>the closest bench should be reconstructed so that the cross slopes do not exceed 2.0%. There should be no greater than a ¼" change in level surface along these routes. A curb ramp or similar modification will be required to eliminate the 7" change in level surface to provide access into the basketball court.</p> <p>Construct at a minimum a 36" wide x 48" deep wheelchair area with compliant slope requirements (no more than 2% slopes in any direction) next to the closest bench. The wheelchair area must be on an accessible route.</p>	2	3	L	Up to \$150
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Estimated Total Cost: Up to \$12,800+

Pine Street Park Assessment Photos



Photo Pine Street Park 1



Photo Pine Street Park 2

QUINEBAUG RIVER BIKEWAY (Schofield Avenue Segment and West Dudley Segment)

Description of Facility: The Dudley segments of the Quinebaug River Bikeway are part of a “planned” bikeway of the larger multi-community Quinebaug River Trail and Bikeway. The Dudley segments are relatively flat with multiple surfaces including loose stone and trap rock, hard packed dirt, cinder, stone-dust, gravel and grass.

General Description or Obstacle Which Limits Mobility or Access:

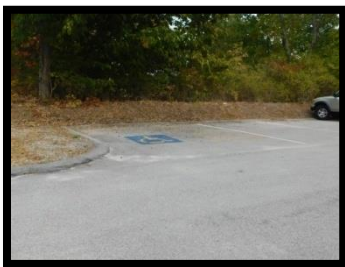
Schofield Avenue Segment

There are 7 paved parking spaces, none of which are designated as accessible. A kiosk, bike rack, bench, and trash receptacle are not on an accessible route of travel and the bench lacks a level hard surface space for a wheelchair. There is no accessible route from the parking area to the trail system. As noted above, the rail trail surface does not meet accessibility standards for wheelchair users or for those with other ambulatory problems.



West Dudley Segment

There are 11 paved parking spaces, one of which is designated as accessible. The accessible space lacks signage. A bench and a trash receptacle are not on an accessible route of travel and the bench lacks a level hard surface space for a wheelchair. There are no detectable warning strips from the parking area across Rail Street to access the trail. Similar to the Schofield Avenue segment, the rail trail surface does not meet accessibility standards for wheelchair users or for those with other ambulatory problems.



Required Actions

As neither of the facilities offer services to those with ambulatory difficulties due to the non-compliant condition of the bikeway, accessibility improvements would be necessitated once the trail surface is paved or reconstructed with hard-packed stone dust. Once an accessible trail surface is in place, then the 2 parking areas will need to provide designated accessible parking with signage, an accessible route of travel to all amenities (kiosk, bench, trash receptacle, bike rack, etc.), a level space for a wheel chair adjacent to the benches, and an accessible route of travel (including detectable warning strips if applicable) to the trail.

STEVENS FIELD

Description of Facility: Smaller recreation area including a soccer field, a drinking fountain, a trash receptacle, and a portable toilet.



General Description or Obstacle Which Limits Mobility or Access: The facility lacks accessible parking. There is no accessible route to and around the soccer field, portable toilet, trash receptacle, and drinking fountain. The drinking fountain is not high-low and lacks knee clearance. The portable toilet is not ADA compliant and lacks sufficient interior space for a 360 degree turn, does not meet water closet setback and clearance requirements, and does not meet dispenser height requirements. *See discussion on Portable Accessible Toilets in Section IX of this plan.*

Stevens Field 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.	502 703.7	23	Create a minimum of one van accessible space as follows: stripe and designate a van accessible parking space at a width of 8' with an 8' access; signage must be set such that the signage height should be a minimum of 60" high at the bottom and a maximum of 96" at the top and located no more than 10' in front of the space; slopes should not exceed 2% in any direction.	1	3	L	Up to \$3,500
<u>Accessible Route</u> No accessible route exists to and around the soccer field, portable toilet, drinking fountain, and trash receptacle.	402 303 403.3 403.4	19.0 20.0 22.4	Construct an accessible route to and around the soccer field, portable toilet, drinking fountain, and trash receptacle with compliant width (48" wide with 36" of clear width) and slope (2% cross, 5% running) requirements. Actual costs will depend on materials used and finish surface (stone dust, asphalt, concrete).	1	3	L	Up to \$15,000

<p><u>Drinking Fountain</u> The drinking fountain is non-compliant as it is not "hi-low", lacks knee clearance and exceeds maximum height requirements for accessibility</p> <p><u>Portable Toilet</u> The portable toilet is not ADA compliant.</p> <p>See Photos Stevens Field 1 and 2.</p>	211 306 602	36.0	Discontinue use of the fountain or provide a compliant "low" drinking fountain on an accessible route with at least 27" knee clearance; 30" clear width; a spout height of no greater than 36" a.f.f.; and operable controls (operable w/one fist and no > 5 lbs. operating force).	2	3	L	\$0 to \$3,500
	308.2 308.3 604.7 309.4 604.4 604.2	30.12 30.7.6 30.8.5 30.7.2 26.9	Replace the existing portable toilet with an "ADA Compliant" toilet such that soap/towel dispensers are no more than 42" a.f.f.; 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; the height of the water closet s/b 17" to 19" a.f.f. to the top of the seat; 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; and a door closing speed that is at least 6 seconds.	3	2	I	TBD

Estimated Total Cost: Up to \$22,000+

Stevens Field Assessment Photos



Photo Stevens Field 1



Photo Stevens Field 2

SHEPHERD HILL HS RECREATIONAL FACILITIES – FOOTBALL, SOCCER, TRACK, BASEBALL, AND SOFTBALL

Description of Facility: High school football, soccer, baseball, and softball fields; a track, tennis courts, and basketball courts. Amenities include parking, portable toilets, bleacher seating, a concession stand, and a drinking fountain.



General Description or Obstacle Which Limits Mobility or Access: The designated accessible parking near Carmignani Memorial Field does not have any spaces designated as van accessible. The accessible parking spaces near the baseball fields are not van accessible, have signage that is too low, lack access aisles, and lack a designated accessible route to the fields. The ticket booth counter at Carmignani Field is too high and there is no accessible route to and into the booth. The asphalt walkway to the field has running slopes that exceed the maximum allowed for a walkway. The concession stand window at Carmignani Field is too high, the interior dispensers are too high, and the sink is non-compliant. The drinking fountain is “low” only and the electric outlet cover in front of the fountain has sunken creating an abrupt change in level surface. The gates to Carmignani Field are not flush on the push side. The “accessible” portable toilet has numerous areas of non-compliance and is not ADA compliant. The ramp to the Carmignani Field bleachers lacks a lower railing, has an abrupt change in level surface at the base of the ramp, has railings that don’t extend beyond the base of the ramp, raised sheets of plywood that create an abrupt change in level surface, and running slopes that exceed the maximum of 8.3%. The bleacher stairs have noncompliant risers and tread nosings. There is no accessible route of travel to and fully around the baseball, softball, and soccer fields and related player and bleacher seating. In addition, there is no accessible route of travel to the tennis courts and basketball courts due to unstable surfaces and excessive running slopes. The tennis courts also have gates that are not flush on the push side. The portable toilet near the basketball courts is not on an accessible route of travel and is not accessible.

Shepherd HS Recreational Facilities 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>
<p>Parking</p> <p>None of the six (6) designated accessible parking spaces near Carmignani Field are van accessible.</p> <p>The two (2) designated accessible parking spaces near the baseball fields lack access aisles, have signs that are 5" and 17" too low, and are not van accessible. The accessible space closest to the tennis courts lacks a striped accessible route from the space to the field walkway.</p> <p>See Photos Shepherd HS 1, 2, and 3.</p>	206 502 703.7	20 23	Accessible signage must be provided for each space and set such that the signage height 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 in front of each space. Van accessible signage must also be provided. The van accessible spaces must be 8' wide with an 8' wide access aisle. A striped accessible route of travel on the pavement from the designated space closest to the tennis courts to the field walkway must be provided.	1	3	I	Up to \$250
<p>Portable Toilet</p> <p>The portable "accessible" toilet at Carmignani Field and the portable toilet near the basketball courts are not ADA compliant. In addition, the portable toilet near the basketball courts is not on an accessible route of travel.</p>	308.2 308.3 604.7 309.4 604.4 604.	30.12 30.7.6 30.8.5 30.7.2 30.7.2 26.9	Replace the existing toilets with "ADA Compliant" toilets such that soap/towel dispensers are no more than 42" a.f.f.; 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 mounted over the grab bars; the height of the water closet s/b 17" to 19" a.f.f. to the top of the seat; 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; and a door closing speed that is at least 6 seconds. The accessible portable toilet must be placed on a level surface (less than 2.0% slope) and on an accessible route of travel.	3	2	I	TBD
<p>Carmignani Field</p> <p><u>Accessible Route from Parking to Field</u></p> <p>The running slope of the asphalt walkway from the ticket booth to the Richard A Carmignani memorial area varies up to 7.7% (approximately 15 foot segment). The running slope from the memorial to the field varies up to 5.7% (approximately 10 foot segment).</p> <p>See Photo Shepherd HS 4.</p> <p><u>Ticket Booth</u></p> <p>The ticket booth counter/window is 13" too high.</p> <p>See Photo Shepherd HS 5.</p> <p>There is a roughly 7½" abrupt change in level service to enter the ticket booth area.</p> <p>See Photo Shepherd HS 6.</p> <p>The door to the booth has knob-style hardware.</p> <p>See Photo Shepherd HS 6.</p>	403 405 904 206 404.2	22 24 17.4 17.6 20 26.11	<p>Install paired railings on both sides of the walkway for the roughly 25 feet of the route of travel that has running slopes in excess of 5.0%. Railings must be in compliance with S. 405 and 505 of the 2010 ADA Standards and S. 24.5 of 521 CMR. Railings must be paired (34"-38" a.f.f. top and 18"-20" bottom), round or oval in shape, and with 12" extensions at the top and bottom.</p> <p>Construct a 36" long x 36" high a.f.f. counter below the existing window. Install wing walls at a height of up to 27" a.f.f. at each end of the counter for cane detection so the counter does not serve as a protruding object.</p> <p>Construct an accessible route of travel or ramp (no > 8.3% running slope with compliant railings (if required) and a level landing/platform at the top) to the ticket booth.</p> <p>Replace knob-style hardware with lever hardware that can be operated with a closed fist.</p>	1 2 2 2	3 2 2	N N N	\$6,750 \$250 Up to \$2,500 \$75

<u>Concession Stand</u> The concession stand counter/window is 7" too high. See Photo Shepherd HS 7. The sink is 1½" too high and lacks knee clearance. The dispensers are up to 23" too high.	904	17.4 17.6	Construct a 36" long x 34" high a.f.f. counter below the existing window. Install wing walls at a height of up to 27" a.f.f. at each end of the counter for cane detection so the counter does not serve as a protruding object.	2	2	N	\$250
	306 606 308.2 308.3	32 6.5 6.6	Depending on usage – sink and dispenser modifications may be required as a result of a reasonable accommodation.	4	3	L	TBD
<u>Drinking Fountain</u> The drinking fountain is non-compliant as it is not "hi-low". There is also an abrupt change on level surface on the approach to the drinking fountain due to a sunken electric box cover. See Photo Shepherd HS 8.	211 306 602 403.4 303	36 22.4	According to school grounds personnel, the drinking fountain is not in service. Option #1: Continue to keep the drinking fountain out of service or remove the fountain in entirety. Option #2: Provide a compliant "hi -low" drinking fountain on an accessible route with at least 27" knee clearance; 30" clear width; a spout height of no greater than 36" a.f.f.; and operable controls (operable w/one fist and no > 5 lbs. operating force. In addition, the cover to the electric box must be modified to reduce the abrupt change in level surface to no more than ¼".	4	3	L	\$0 to \$3,500
<u>Gates to Field</u> The chain link gates to the field and track (2 total) 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.	404.2	NA	Remove the gates or install smooth plating at the base of the gates.	1	2	N	\$200
<u>Ramp to Bleachers</u> There is a 1½" abrupt change in level surface at the base of the ramp.	403	22	Modify the plywood to create a beveled slope at the approach.	2	2	I	\$0
There is no lower railing for the ramp to the bleachers.	505	24.5	Install lower railings at a height of 18" to 20" a.f.f. to the top of the gripping surface with an outside diameter of 1½" – 2" and oval or round in shape.	2	3	I	Up to \$3,000
The upper railings do not extend 12" beyond the base of the ramp.	405.8 505	24.5	Provide 12" extensions parallel to the ground surface beyond the base of the ramp.	2	3	I	\$250
Approximately 12 feet of ramp segment before the level landing and 6 feet of ramp segment after the level landing have running slopes up to 9.3%, which exceeds the maximum allowed of 8.3%.	405.2	24.2	Modify and/or reconstruct the ramp to comply with the maximum slope requirement of 8.3%.	2	3	I	TBD
The plywood ramp surface has numerous areas of abrupt changes in level surface of greater than ¼".	403.4	22.4	Modify and/or secure the plywood surface to ensure there is a no more than ¼" abrupt change in level surface between plywood sheets.	2	2	I	\$0
See Photos Shepherd HS 9, 10, 11, & 12.							
<u>Bleacher Stairs</u> The bleacher stairs (5 sets) have partially open risers and 1" unbeveled nosings. See Photo Shepherd HS 13.	504	27	Modify the risers and nosings so the risers are not open and the nosings are beveled and not abrupt.	2	3	I	TBD

<u>Gates to Tennis Courts</u> The chain link gates (4) to the tennis courts 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.	404.2	NA	Remove the gates or install smooth plating at the base of the gates.	1	2	N	\$400
<u>Accessible Route of Travel to Fields and Recreational Facilities</u> The existing stone dust walkway throughout the entirety of the complex is not maintained, has weed overgrowth, has abrupt changes in level surface, and does not go to the entirety of all fields and player seating areas and bleachers. The transition at the multiple bridge crossings have typically abrupt changes in level surface of up to 2" which exceeds the maximum of ¼".	403 405	22 24	Maintain the existing walkway and reconstruct to comply with the maximum required 5.0% running slope requirement for a walkway including transitions points at bridge crossings for a no more than ¼" abrupt change in level surface.	2	4	L	Up to \$5,000
<u>Tennis and Basketball Court</u> The route of travel to the tennis courts varies up to 22.7% and there is no accessible route of travel to the basketball court due to an unstable and not firm surface.	403 405	22 24	Reconstruct the accessible route of travel to maintain a no greater than 5.0% running slope to access both the basketball and tennis courts.	2	4	LN	TBD

See Photos Shepherd HS 14, 15, and 16.

Estimated Total Cost: Up to \$22,425+ plus TBD

Shepherd HS Recreational Facilities Accessibility Photos



Photo Shepherd HS 1



Photo Shepherd HS 2



Photo Shepherd HS 3



Photo Shepherd HS 4



Photo Shepherd HS 5

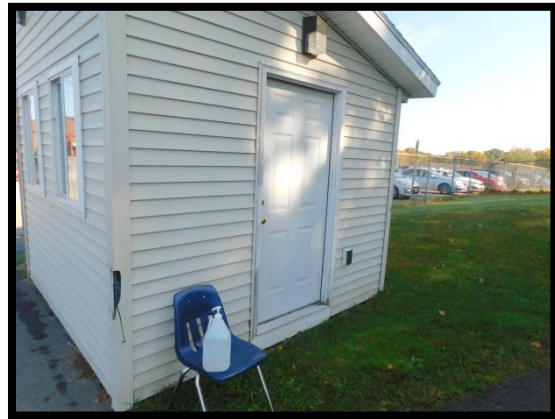


Photo Shepherd HS 6



Photo Shepherd HS 7



Photo Shepherd HS 8

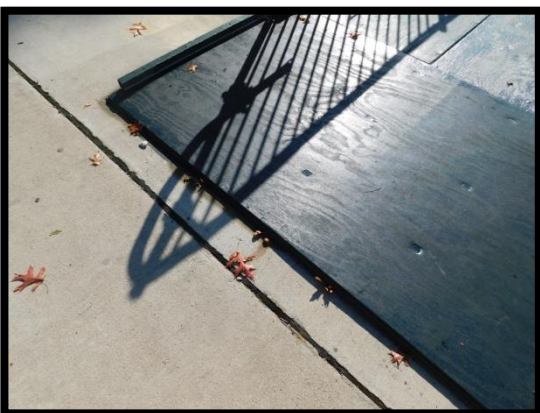


Photo Shepherd HS 9

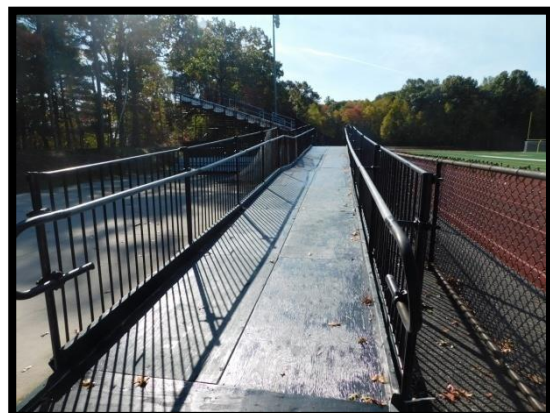


Photo Shepherd HS 10

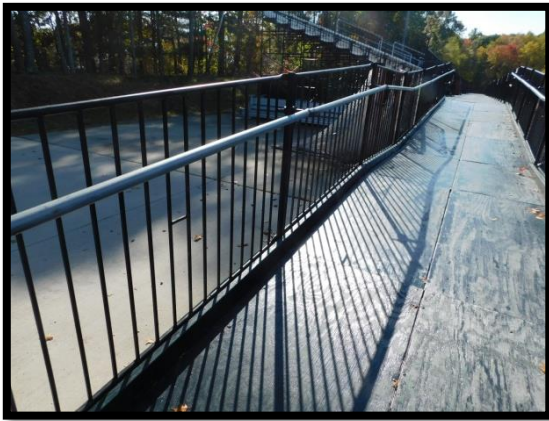


Photo Shepherd HS 11

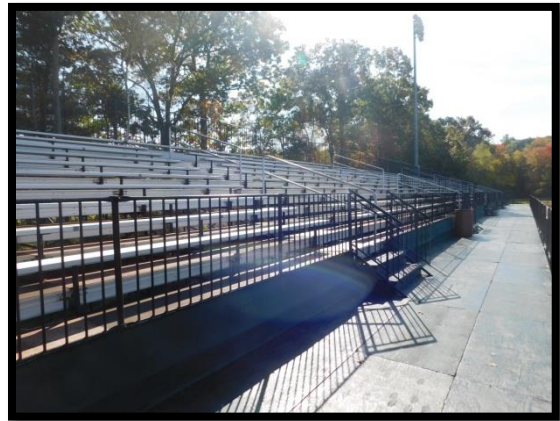


Photo Shepherd HS 12

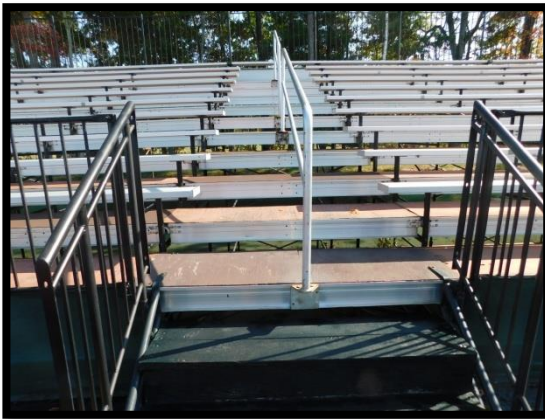


Photo Shepherd HS 13



Photo Shepherd HS 14



Photo Shepherd HS 15



Photo Shepherd HS 16

DUDLEY MIDDLE SCHOOL FIELDS

Description of Facility: Dudley Middle School has 3 field areas – a baseball field and a soccer field at the beginning of the roadway to the school and an apparent multi-purpose field next to the Middle School Building.



General Description or Obstacle Which Limits Mobility or Access: There are no accessible routes to and around the baseball field, soccer field, and multi-purpose field. If portable toilets are used during the sports seasons, compliance must be in accordance with the discussion *on ADA Compliant Portable Toilets in Section IX* of this plan.

Dudley Middle School Fields 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>Accessible Route</u> No accessible route exists to and around the baseball field, soccer field, and multi-purpose field. <i>See Photos Dudley MS 1, 2, and 3.</i>	402 303 403.3 403.4	19.0 20.0 22.4	Construct an accessible route to and around the baseball field, soccer field, and multi-purpose field with compliant width (48" wide with 36" of clear width) and slope (2% cross, 5% running) requirements and with no changes in level surface. Actual costs will depend on materials used and finish surface (stone dust, asphalt, concrete). <i>Note: If the multi-purpose field adjacent to the school is not used for organized public and/or school sporting events and activities, it may not be necessary to provide full access to and around the field. Organized and formal use will require the construction of an accessible route.</i>	1	3	L	Up to \$7,500+

Estimated Total Cost: Up to \$7,500+

Dudley Middle School Fields Assessment Photos



Photo Dudley MS 1



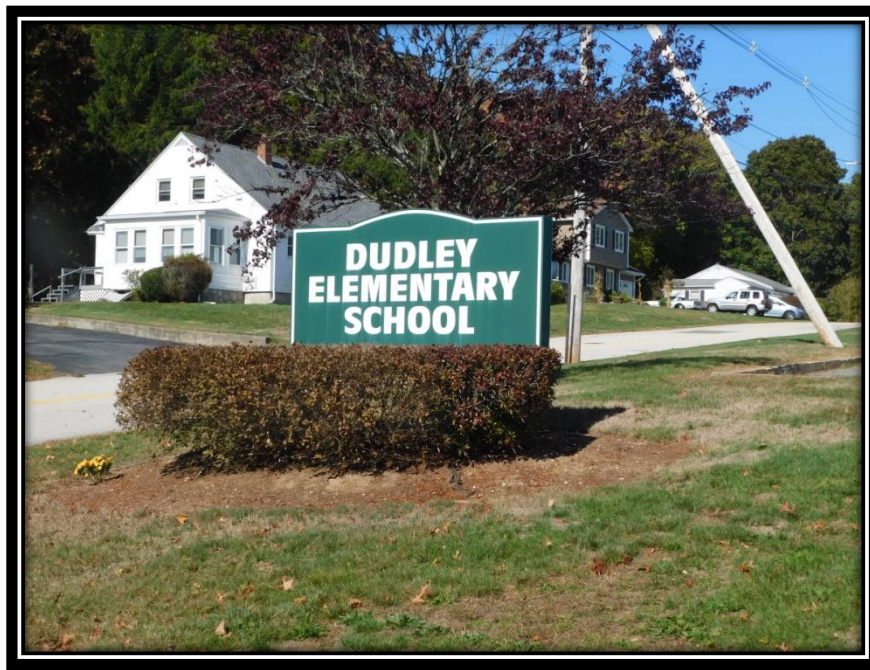
Photo Dudley MS 2



Photo Dudley MS 3

DUDLEY ELEMENTARY SCHOOL PLAYGROUND

Description of Facility: A school playground consisting of 2 picnic tables, 2 benches, play components, 6 swings, and a climbing feature.



General Description or Obstacle Which Limits Mobility or Access: There is no accessible route fully around the playground or within the playground area including to the play components, benches, and picnic tables. Apart for one swing, the playground lacks accessible play components. The surface to the playground consists of non-compliant wood chips. The picnic tables do not provide the required knee height and depth and the benches lack an adjacent level area for a wheelchair.

Dudley Elementary School Playground 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>Accessible Route</u> No accessible route exists fully around the playground and to the playground components, benches, picnic tables, swings. Although one of the swings is designed as "accessible", the rubberized route of travel to the swing has a 22.0% running slope at the entry point from the asphalt. See Photos Dudley ES 1	402 303 403.3 403.4	19 20 22.4	An accessible route of travel needs to be provided to all areas available to the public. Construct an accessible route compliant with width (48" wide with 36" of clear width; up to 60" wide if connecting play components) and slope (2% max. cross, 5% max. running) requirements. An accessible route needs to be provided fully around the entirety of the playground and to all internal components (play equipment, benches, picnic tables). Construction options include compacted stone dust, asphalt or similar surfaces that meet the requirement of stable, firm, and slip resistant with no abrupt changes in level surface. Costs will vary depending on material used.	1	3	L	Up to \$5,000

<u>Benches</u> There are no level surface areas for wheelchairs at the benches.	221.2 802.1	14 19	Create an approach and wheelchair companion area at the benches that are on an accessible route of travel. 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.	1	3	L	Included in above
<u>Picnic Tables</u> Neither of the two (2) existing picnic tables provide the required accessible knee height and depth. See Photo Dudley ES 2.	226.1 902	19	At least 5% or at least one table must be accessible. Purchase one accessible picnic table. The table surface s/b 28" to 34" a.f.f. to the top surface with at least 27" knee clearance, 30" clear width, and 19" depth.	2	2	N	\$750
<u>Playscape and Swings</u> There are no accessible play components. Wood chips are the sole surface treatment for the immediate area around the play components and swings. See Dudley ES 3.	402 1008.2	19.7 20.0 14 19	Accessible playscape and ground components should be added. Ground surfaces immediately around play components and in the fall zone must comply with ASTM F 1951 and ASTM F 1292. Depending on testing, the existing wood chip surface may or may not comply with these standards and may need to be replaced with a compliant material.	1	3	L	\$20,000 to \$55,000

Estimated Total Cost: Up to \$60,750

Dudley Elementary School Playground Assessment Photos



Photo Dudley ES 1



Photo Dudley ES 2



Photo Dudley ES 3

MASON ROAD ELEMENTARY SCHOOL PLAYGROUND

Description of Facility: A school playground consisting of 2 picnic tables, 4 benches, 10 swings (2 accessible), 1 large playscape, 1 smaller playscape, 2 teeter totters, and a basketball court.



General Description or Obstacle Which Limits Mobility or Access: There is no accessible route fully around the playground or within the playground area including to the play components, benches, and picnic tables. Although "Access Deck" matting is used in the interior of the playground as an accessible route of travel, it does not go to all components and amenities. Wood chips are used as a ground surface for the remaining areas of the playground. In addition, the primary access point to the playground has an 18.0% running slope and the secondary access point near the basketball court has a 4" abrupt change in level surface into the play area. Due to the location of a crossbar on the picnic tables, the knee depth is reduced to less than the required 19" knee depth. Apart for the two swings, the playground lacks accessible play components. The benches lack an adjacent level area for a wheelchair.

There are 2 designated accessible parking spaces near the playground area and it is assumed these are for playground users. Neither space is designated as van accessible, there is no striped accessible route to the playground, and the cross slopes exceed the maximum of 2.0%

Mason Road Elementary School Playground 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>Accessible Route</u> No accessible route exists fully around the playground and to the playground components, benches, picnic tables, and swings. The running slope at the primary entrance into the playground exceeds the maximum allowed for a walkway by 13%. The primary entrance	402 303 403.3 403.4	19 20 22.4	An accessible route of travel needs to be provided to all areas available to the public. Construct an accessible route compliant with width (48" wide with 36" of clear width; up to 60" wide if connecting play components) and slope (2% max. cross, 5% max. running) requirements. An accessible route needs to be provided fully around the entirety of the playground and to all	1	3	L	Up to \$6,000

also has an abrupt change in level surface of greater than ¼". The secondary entrance near the basketball court has a 4" abrupt change in level surface. Although "Access Deck" matting is used as an accessible route for the playground interior and to the playscapes, it does not fully extend to play equipment and the other playground amenities (benches, picnic tables, etc.). See Photos Mason ES 1, 2, and 3.			internal components (play equipment, benches, picnic tables). Construction options include compacted stone dust, asphalt, matting, or similar surfaces that meet the requirement of stable, firm, and slip resistant with no abrupt changes in level surface. Costs will vary depending on material used. Modifications will be required at the playground's two entry points to provide an accessible walkway that does not exceed 5.0% and to eliminate abrupt changes in level surface so they do not exceed ¼".				
<u>Benches</u> There are no level surface areas for wheelchairs at the benches.	221.2 802.1	14 19	Create an approach and wheelchair companion area at the benches that are on an accessible route of travel. 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.	1	3	L	Included in above
<u>Picnic Tables</u> Neither of the two (2) existing picnic tables provide the required accessible knee depth as the cross bars reduce the depth to 15".	226.1 902	19	At least 5% or at least one table must be accessible. Purchase one accessible picnic table. The table surface s/b 28" to 34" a.f.f. to the top surface with at least 27" knee clearance, 30" clear width, and 19" depth.	2	2	L	\$750
<u>Playscape and Swings</u> There are no accessible play components. Wood chips are the sole surface treatment for the immediate area around the play components and swings. See Photos Mason ES 4 and 5.	402 1008.2	19.7 20.0 14 19	Accessible playscape and ground components should be added. Ground surfaces immediately around play components and in the fall zone must comply with ASTM F 1951 and ASTM F 1292. Depending on testing, the existing wood chip surface may or may not comply with these standards and may need to be replaced with a compliant material.	1	3	L	\$0 to \$50,000
<u>Chain Link Gates</u> The chain link gate to the playground does 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.	404.2	NA	Remove the gate or install smooth plating at the base of the gates.	1	2	L	Up to \$100
<u>Parking</u> There is no van designated accessible space. The parking space closest to the playground and the access aisle have cross slopes that vary up to 4.1% which exceeds the maximum allowed of 2.0%. See Photo Mason ES6.	206 502 703.7	20 23	Resurface the parking space and access aisle such that the running and cross slopes do not exceed 2.0% and the ground surface is uniform, stable, firm, and slip resistant. Provide striping for the designated parking spaces and access aisle. The parking spaces and shared access aisle s/b 8' in width. Van accessible signage s/b provided. A striped accessible route of travel on the pavement must be provided to the playground area.	1	3	L	Up to \$1,800

Estimated Total Cost: Up to \$58,650

Mason Road School Playground Assessment Photos



Photo Mason ES 1



Photo Mason ES 2



Photo Mason ES 3



Photo Mason ES 4



Photo Mason ES 5



Photo Mason ES 6

XIV. DUDLEY SIDEWALKS AND CURB RAMPS

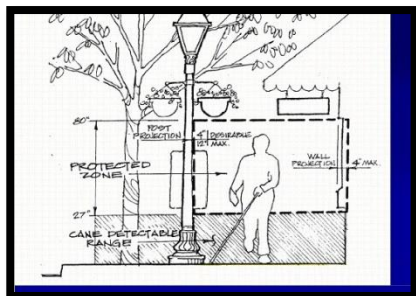
Description of Assessment Area: The assessment of public sidewalks, curb ramps, and crosswalks within the town focused on the East and West Main Street Corridor; the Town Common; the immediate area around the High School, Middle School, Elementary School, and Mason Road School; Brandon Road; and the Jericho Neighborhood.

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

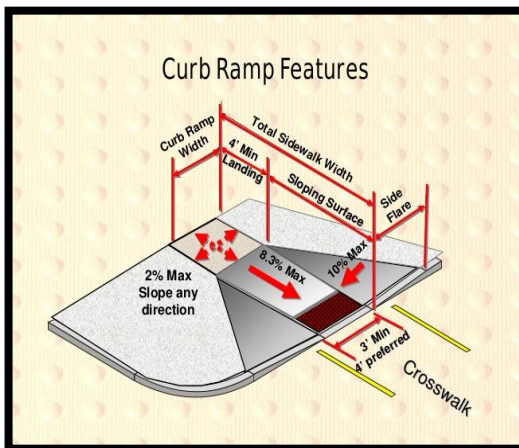
- A minimum of a 4 feet wide sidewalk (excluding the curb) with a 3 feet minimum unobstructed width. If the sidewalk is not 5 feet wide, then a 5 feet by 5 feet level passing space should be provided every 200'. Citation: ADAAG S. 403.5; 521 CMR S. 22.2; PROWAG.
- If the slope of the natural topography 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, 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; 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 updrift 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 (15 inches to 48 inches above finish ground). 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; 521 CMR S. 21.



Responsible Party: Highway Department and Board of Selectmen

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.

East Main Street Corridor Sidewalks and Curb Ramps (CT Town Line to Town Hall):

The East Main Street Corridor consistently has sidewalks along the entire corridor which has curved granite curbing that restricts the clear width to 24" or less at each driveway location. Sidewalk widths along the corridor are typically only 3 feet. A storm drain at #258 East Main Street has 2" storm grate openings parallel to the route of travel. A telephone pole, along with overgrowth, restricts the sidewalk clear width to 2 feet in the vicinity of # 235 East Main Street.

Most of the crosswalks and curb ramps from the Dudley-CT town line to the Town Hall are asphalt without flared sides and lack detectable warning strips. The exception is the Mason Road-West Main Street intersection which has concrete curb ramps with detectable warning strips. However, this intersection lacks striped crosswalks. A number of the curb ramps have excessive running slopes including Dudley Hill Road – West Main Street (18.3%), Conant Ave – West Main Street (26.1%), and

Pattison Avenue (11.1% and 16.5%). The Dudley Hill Road – West Main Street curb ramp also lacks a level landing.



West Main Street Corridor Sidewalks and Curb Ramps (Town Hall to Webster Town Line):

The driveway at #70 West Main Street has a cross slope of 10.9%. A water cover has an abrupt change in level surface of > 1" in the sidewalk. The overall sidewalk surface has heaving and deterioration. The driveway at #66 and #55 West Main Street have cross slopes of to 12.3%. A water cover has an abrupt change in level surface of > 1" in the sidewalk at #66. The overall sidewalk surfaces have heaving and deterioration. Clear widths are reduced to 24" at #55 and #47 driveways. The sidewalk ends abruptly at #45. The sidewalk/driveway at Dipping Donuts on West Main Street is deteriorated resulting in an abrupt change in level surface of 2" to 3". The cross slopes at the Dollar General driveways are in excess of 2.0%. The sidewalks on both sides of the Webster-Dudley town line bridge have abrupt changes in level surface of 2" to 5". The odd side of the street sidewalk on the bridge is severely deteriorated with abrupt changes in level surface of 1"+.

A curb ramp at Town Hall has a 2" abrupt change in level surface at the detectable warning strip. The crossings at Elizabeth Street, Central Avenue (south side near Woofy's Dog Grooming), Mill Street, and River Court lack detectable warning strips. Crosswalks also lack striping. Central Avenue and Mill Street also have abrupt changes of 1" to 2" at the transition from the road to the curb ramp. The Mill Street and West Main Street curb ramp on the east side also lacks a level landing at the top of the curb ramp.

The Schofield Avenue-West Main Street intersection has numerous non-compliance concerns. The curb ramp at Dipping Donuts lacks a detectable warning strip and has a running slope of 11.2%. The south west curb ramps (2 on one side) lack level landings, lack detectable warning strips, has granite curbing at the crosswalk resulting in 4+ inch abrupt change in level surface, and has a running slope of up to 10.6%. The south east curb ramp at Schofield Avenue (library side) lacks a level landing, lacks detectable warning strips, and has a running slope of up to 10.1%. The sidewalk at Dipping Donuts on Village Street just past the intersection has a 2" abrupt change in level surface at the driveway due to deterioration and the clear width is reduced to only 31".





Town Common Sidewalks and Curb Ramps:

The crosswalk at the Common has deteriorated striping and ends at newly installed granite curbing on both sides with up to 5+” abrupt changes in level surface. It appears that this crosswalk is no longer in service, and if so, the striping should be removed. If in service, then curb ramps as detailed above would need to be installed.



Schools Sidewalks and Curb Ramps:

The sidewalks at the High School entrance lack curb ramps and have abrupt changes in level surface due to granite curbing. The crosswalk at the principal’s office lacks a curb ramp and is inaccessible due to granite curbing creating an abrupt change in level surface of 5+”. The sidewalk/curb ramps at the side front entrance to the high school lack detectable warning strips.

The crossing at the Middle School field lacks detectable warning strips. The sidewalk/curb ramps at the middle school main and side entrances have granite curbing and abrupt changes in level surface of 5+”, no detectable warning strips, and running slopes in excess of 8.3%.

Mason Road Elementary School does not appear to have any non-compliant sidewalk and/or curb ramp issues. Dudley Elementary School appears to be complaint but for the sidewalks in front of Crawford Field which lack detectable warning strips and have a width of only 3 feet.



Brandon Road Sidewalks and Curb Ramps:

Overall, the sidewalks on Brandon Road are in good condition. The curb ramp at Schofield Avenue and Brandon Road and across Schofield Avenue has a running slope of 16.0% on one side and granite curbing with an excessive abrupt change in level surface due to granite curbing on the opposite side. Neither side has a detectable warning strip. There are no curb ramps (granite curbing), no detectable warning strips and the crosswalk is not striped at the crosswalk/curb ramps across Brandon Road at Schofield Avenue. The curb ramp on side at the Library and Brandon Road does not have a level landing with a 12.4% slope. The flared sides exceed that allowed but the accessible route terminates at the flare so no other action is required. The remainder of the Brandon Road curb ramps are asphalt with no detectable warning strips. The 1st Avenue crosswalk has granite curbing at the sidewalk on both sides of up to 5"+. The 2nd Avenue curb ramp has a running slope in excess of 8.3% which exceeds that allowed.



Jericho Neighborhood Sidewalks and Curb Ramps:

With the exception of Mill Street, the sidewalks in the Jericho neighborhood are in fair to poor/very poor condition.

Green Street to Oak Street has sidewalk widths which are reduced to 24" to 36" with abrupt changes in level surface, deteriorated asphalt and overlays, and limited maintenance with overgrowth. In some areas, there is upheaval due to tree roots. Curb ramps are asphalt and lack detectable warning strips. The crossing at Green and Chestnut Streets has a 17.6% running slope at the curb ramp on one side and an abrupt change in level surface of 1"+ on the opposite side. The crossing at Green and Pine Streets has a catch basin at the base of the asphalt curb ramp on one side and an abrupt change in level surface of up to 5" on the opposite side due to granite curbing. In addition, there are no level landings and clear width is reduced to 24".



Oak Street has similar conditions as Green Street and also has an excessive sidewalk cross slope of up to 9.5% at #9 Oak Street. Curb ramps are asphalt, with no detectable warning strips. The crossing at #7 Oak Street has 6" granite curbing which restricts access.



West Street sidewalks are generally in very poor condition. Sidewalk widths are reduced to less than 28" in areas due to overgrowth or retaining walls (odd side of street). A fire hydrant at #15 - #17 West Street reduces the sidewalk clear width to 24". The sidewalk at #9 Oak Street has a retaining wall which restricts clear width and then the sidewalk abruptly ends with no crossing or curb ramp. A basketball hoop in the sidewalk at #2 West Street restricts access entirely. In addition, a telephone pole in the vicinity of #2 West Street reduces the clear width to only 28". A water cover at the base of the stairs to #2 West Street creates an unsafe 1" abrupt change in level surface. The sidewalk cross slope between #2 and #4 West Street exceeds 8.0%. West Street curb ramps are asphalt with no detectable warning strips and no striped crosswalks. The curb ramp at Oak and West Street has a running slope in excess of 10.6%.



Oxford Avenue sidewalks are in overall fair to poor condition with broken concrete and asphalt overlay. In addition, water covers in the sidewalk and granite curbing at driveways (#14 Oxford Avenue) as well as general heaving and deterioration creates excessive abrupt changes in level surface. Oxford Avenue curb ramps are asphalt with no detectable warning strips and no striped crosswalks. The crossings at Oxford/School Street, Oxford/Oak Street, and Oxford/Pine Strret have abrupt changes in level surface of 2" to 6" due to granite curbing.



Mill Street sidewalks are generally in good condition. The sidewalk at Tri Valley is reduced to one foot in width. The sidewalk past Ardlock Place to West Main Street has telephone poles in 4 locations which reduces the clear width from 21" to 31". Telephone guy wires create reduced head room. The cross walk at the end of Mill Street near West Main Street lacks detectable warning strips. The sidewalk in this area is deteriorated and heaving and is only 36" wide. The Mill Street-Ardlock Place intersection has asphalt curb ramps which lack detectable warning strips, have excessive running slopes up to 17.8%, and lack level landings. One side has an abrupt change in level surface of 2" at the transition from the street to the sidewalk. The crossing also lacks striping.



Estimated Cost for Modifications:

Depending on the extent and type of improvements undertaken, either spot repairs or total reconstruction, the costs will vary significantly and most likely will require an engineering study inclusive of plans to provide an adequate cost estimate.

XV. 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 G: Prioritization of Projects

Appendix A: Survey Form

Dudley Self-evaluation Survey

Department/Board/Commission: _____

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

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

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

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

7. Does the department/program have a formal or informal process for responding to requests for modifications?
8. Briefly describe general office/service communications. Specifically, how is information disseminated and communicated? Are there assistive devices or auxilliary aids (ie. TTY, TDD, sign language interpreter) which are used or available?
9. Are there any circumstances in which a person with a disability would be asked to pay a fee or meet any other requirements not imposed on other program/service participants? If yes, describe.

10. Does the program/service provide any separate activities for people with disabilities? If yes, describe.

11. 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?

12. 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.

- 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 Dudley
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 Dudley will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

Employment. The Town of Dudley 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 Dudley 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 Dudley 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 Dudley 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:

Jonathan Ruda, Town Administrator
Phone: 508.949.8030
Email: administrator@dudleyma.gov

The Town of Dudley 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 Dudley
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 Dudley.

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:

Jonathan Ruda, Town Administrator
Phone: 508.949.8030
Email: administrator@dudleyma.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 Dudley 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 Town Administrator.

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

Within 15 calendar days of the meeting, the Town Administrator 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 Dudley

Reasonable Accommodation Policy

In accordance with the Americans with Disabilities Act, the Town of Dudley 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 Dudley 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

Jonathan Ruda, Town Administrator
Phone: 508.949.8030
Email: administrator@dudleyma.gov

If the Town of Dudley 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 Dudley 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 DUDLEY
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) _____

☐ Town 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
DUDLEY 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 Dudley) 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.

Appendix G: Prioritization of Projects

PRIORITIZATION OF PROJECTS

The prioritization of projects is at the sole discretion of the local jurisdiction. The following recommendations should be considered as general guidance in helping the municipality develop a capital plan to address the areas of concern identified in this Self-evaluation and Transition Plan.

As a “rule of thumb”, prioritization should take into consideration the most public and/or actively used facilities, the degree of non-compliance of a facility, and the immediate impact on those with disabilities.

Assuming a one (1) point to nine (9) point value for each area of these three (3) areas of consideration (1 point being most significant and 9 points being least significant), a top priority project would have a value of one (1) to three (3) points, a second level priority project would have a value of four (4) to six (6) points, and a third level priority project would have a value of seven (7) to nine (9) points per each category. The lower total number of points would receive higher prioritization. This simple point system does not necessarily work with all projects and facilities but can provide basic guidance on where to prioritize limited resources. Additional consideration and weight must be given to whether the issue of non-compliance is related to building or facility access, bathroom access, or access to other programs and services.

Using this system, the following table identifies where resources could be prioritized.

Facility	Public Use	Degree of Non-Compliance	Impact	Total
Municipal Office Building – Town Offices	2	6	6	14
Municipal Office Building – Senior Center	3	5	6	14
Municipal Office Building – Police Station	5	6	8	19
Pearle L. Crawford Memorial Library	2	5	6	13
Fire Station	5	7	7	19
Highway Garage	8	4	8	20
Animal Control	6	3	8	17
Transfer Station	3	8	8	19
New Boston Road/Peter Amorello Sr., Memorial	5	9	9	23
Ardlock Acres	5	9	9	23
Baker Pond Road	5	9	9	23
Town Common	3	6	8	17
Cemeteries	3	9	9	21
Crawford Field	3	2	2	7
Town Beach	3	1	2	6
Fun Zone Playground	5	6	6	17
Pine Street Park	5	6	6	17
Quinebaug River Bikeway Segments	5	9	9	24
Stevens Field	5	7	8	20
Shepherd Hill Regional HS Field Complex	5	3	5	13
Dudley Middle School Fields	7	5	8	20
Dudley Elementary School Playground	7	2	5	14
Mason Road School Playground	7	3	5	15
Sidewalks and Curb Ramps	1	2	2	5

Based on the above, priority improvements would be as follows:

- Sidewalks and curb ramps in the East and West Main Street Corridor; the Town Common; the immediate area around the High School, Middle School, Elementary School, and Mason Road School; Brandon Road; and the Jericho Neighborhood.
- Town Beach to provide parking, an accessible route to all amenities at the town beach complex, and to undertake bathroom modifications.
- Crawford Field to provide compliant accessible parking, an accessible route to all amenities and playing fields, and to undertake bathroom modifications.
- Pearle L. Crawford Memorial Library to provide tactile designation signage, modify kitchenettes for required knee clearance, undertake bathroom modifications, and provide compliant work stations.
- Shepherd Regional High School Field Complex to modify the parking, provide accessible routes to all playing fields, construct compliant counters at the ticket office and concession stand, and modify the Carmignani Field bleacher ramp and stairs.
- Update policies and procedures pertaining to the Americans with Disabilities Act including the adoption of the recommended Public Notice, Grievance Procedure, and Reasonable Accommodation Policy.