

**Town of Northbridge  
Self-Evaluation and Transition Plan  
June 2022**

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**Prepared by:**

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for  
Central Massachusetts Regional Planning Commission  
Connor Robichaud, Regional Projects Coordinator  
1 Mercantile Street – Suite 520, Worcester, MA 01608  
and  
The Town of Northbridge, Massachusetts

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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 NORTHBRIDGE – 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 Northbridge 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 Northbridge is bound specifically by Titles I and II.

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

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

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

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

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

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

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

## **Title I**

### *Equal Employment Opportunity*

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

### *Reasonable Accommodations*

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

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

## **Title II**

### *Program Accessibility*

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

The ADA guarantees people with disabilities equal opportunity to participate in all programs, services, and activities of state and local government. Accessibility standards must be followed for new construction as well as accommodations. These standards are based on the ADA Accessibility Guidelines (ADAAG) as developed by the U.S. Access Board provide guidance to the ADA Standards for Accessible Design as enforced by the U.S. Department of Justice (DOJ), U.S. Department of Transportation (DOT), and the federal courts and apply nationwide.

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

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

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

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

### *Effective Communication*

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

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

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

### **Title III**

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

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

### **Title IV**

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

federal agency or instrument of the federal government must include closed captioning of the verbal content of such announcement.

### **Title V**

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

### **Definition of Commonly Used Terms**

*Disability* - a physical or mental impairment that substantially limits a major life activity, such as walking, seeing, hearing, learning, breathing, caring for oneself, or working. To be protected under the ADA, a person must have, have a record of, or be regarded as having a record of, a substantial impairment. A substantial impairment is one that significantly limits or restricts a major life activity such as hearing, seeing, speaking, breathing, performing manual tasks, walking, caring for oneself, learning or working. Individuals who have successfully completed or are currently enrolled in a drug or alcohol rehabilitation program are also considered to be disabled. The ADA protects three classes of people with disabilities:

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

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

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

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

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

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

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

### **Program Accessibility**

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

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



### **III. OTHER FEDERAL ACCESSIBILITY REGULATIONS**

#### **Architectural Barriers Act (ABA) - 1968**

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

#### **The Rehabilitation Act – 1973**

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

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

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

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

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

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

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

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

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

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

Telephones, smart phones and mobile devices

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

#### **Voting Accessibility for the Elderly and Handicapped Act - 1984**

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

#### **Air Carrier Access Act - 1986**

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

### **Fair Housing Act - 1988**

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

### **Individuals with Disabilities Education Act - 1990**

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

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

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

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

### **Telecommunications Act - 1996**

The Telecommunications Act of 1996 requires telecommunications products and services to be accessible according to guidelines developed by the Access Board. It covers a broad range of products, including telephones, cellular phones, pagers, and fax machines. The Federal Communications Commission (FCC) enforces requirements of the law.

### **Help America Vote Act – 2002**

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

### **ADA and The Rehabilitation Act Enforcement and Compliance**

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

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

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

The address for the Department of Justice is—

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

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

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

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

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

For technical assistance, the following can be contacted:

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

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

Section 521 of the Code of Massachusetts Regulations, "521 CMR: Architectural Access Board" is a specialized section of the State Building Code which provides the actual construction standards and specifications which must be adhered to for work performed on "public" buildings (see definition of public building in 521 CMR) in the Commonwealth of Massachusetts. The purpose of 521 CMR is to make public buildings and facilities accessible to, functional for, and safe for use by persons with disabilities. It is the intent of 521 CMR to provide persons with disabilities full, free and safe use of all buildings and facilities so that all such persons may have the educational, living and recreational opportunities necessary to be as self-sufficient as possible and to assume full responsibilities as citizens.

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

##### Jurisdiction of 521 CMR

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

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

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

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

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

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

## V. ALTERATIONS TO HISTORIC PROPERTIES

### **ADA 2010 Standards**

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

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

### **Massachusetts 521 CMR**

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

## VI. ELECTRIC VEHICLE (EV) CHARGING STATIONS

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

### Massachusetts Architectural Access Board

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

### U.S. Department of Energy

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

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

## **VII. EMERGENCY PREPAREDNESS**

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

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

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

### Notification

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

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

### Evacuation

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



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

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

#### Sheltering

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

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

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

#### Access to Medications, Refrigeration, and Back-up Power

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

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

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

#### Access to Information

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

#### Leaving the Shelter and Returning Home

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

## **VIII. ADA SERVICE ANIMALS**

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

### Definition of Service Animal

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

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

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

### Where Service Animals Are Allowed

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

### Service Animals Must Be Under Control

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

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

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

#### Miniature Horses

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

## IX. ADA COMPLIANT PORTABLE TOILETS

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

### Representative Examples of an ADA Compliant Portable Toilet



## X. EMERGENCY EYEWASH STATIONS

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

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

All emergency equipment must comply with ADA requirements as follow:

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

Photographic examples of compliant emergency eyewash stations are provided below.



## **XI. 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 Northbridge 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 Selectmen 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.

#### **Northbridge 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 Northbridge has an active Commission on Disability established at Town Meeting under MGL Chapter 40 Section 8J according to the Massachusetts Office on Disability (MOD) November, 2021 listing of Active Commissions on Disability in Massachusetts. In addition, the Town of Northbridge adopted Chapter 40 Section 22G that enables the Commission on Disability to collect the fines generated by people who park illegally in handicap parking spaces according to the MOD publication "Established Commissions on Disability in Massachusetts" dated June 2019.

The Commission on Disability has its own web page under Boards & Commissions on the Town of Northbridge's website referred to as Disability Commission. The following are listed as current members: Jonathan Smith, Chair; Bruce Frieswick, Member; Washa Liu, Member; Dan O'Neill, Member; with one vacancy.



#### Recommendations

Add ADA Related documents such as who the town's ADA Coordinator is, along with the ADA Grievance Procedure, Notice of Non-Discrimination, Policies, Procedures & Practices, and Public Notice.

Notify the Massachusetts Office on Disability (MOD) whenever the membership or chairmanship changes on the Northbridge Commission on Disability.

#### **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.

#### Northbridge Self-evaluation.

According to the 2021 Annual Town Report, Town Manager Adam D. Gaudette is the Town's ADA Coordinator and Amy McKinstry; School Superintendent is the ADA Coordinator of the School Department. However the 2018 MOD Municipal ADA Coordinator Listing has Theodore Kozak as the town's ADA Coordinator.

#### Recommendations

Notify the Massachusetts Office on Disability that Town Manager Adam Gaudette is currently the ADA Coordinator. In addition, list this as a duty on the Town Manager's web page along with Amy McKinstry as ADA Coordinator for the Superintendent's web page under Northbridge Public Schools.

It is also recommended that the ADA Coordinator position be posted in the Town Hall and on the Town's website under Departments and on the Commission on Disabilities webpage.

### **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.

#### **Northbridge Self-evaluation.**

Title II of the ADA requires that public entities notify participants of its non-discrimination policies. 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. The non-discrimination policies posted on these bulletin boards pertain only to employment such as being an equal opportunity employer that does include those with disabilities.

The self-evaluation survey question "Is the public informed that these programs/services are prepared to make reasonable modifications?" responses were mostly "no, N/A, or not sure".

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 (4 responses were informal, the rest were no or N/A), staff are willing to accommodate residents and/or guests who require additional assistance.

#### **Recommendations**

If the Town of Northbridge does not have a Public Notice Document, create one using the sample Public Notice in Attachment B as a guide and post it on the Town Hall bulletin boards, the Town's website in the Town Manager/ADA Coordinator's, Town Clerk's and Commission on Disabilities' web pages.

**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.

#### **Northbridge Self-evaluation.**

It does not appear that the Town of Northbridge has adopted an 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 Northbridge create one using the sample **Grievance Procedure** provided in Attachment C. as a guide.

#### **Recommendations**

The grievance procedure should be posted in town hall and made available to all staff, departments, committees, and boards. It should be posted in the Town Manager/ADA Coordinator's webpage or create a separate web page for the ADA Coordinator position under Departments that could also post the Public Notice of Non-Discrimination. In addition, the Grievance Procedure should be posted in the Commission on Disabilities web page.

**A sample Grievance Procedure is provided as Attachment C.**

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

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

#### **Northbridge 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 following statement appears in the Town's online Application for Employment Form which must be completed when applying for a job.

#### **APPLICATION FOR EMPLOYMENT COMMONWEALTH OF MASSACHUSETTS Town of Northbridge**

ALL APPLICATIONS TO BE RETURNED TO THE TOWN MANAGER'S OFFICE

Applicants are considered for all positions without regard to race, color, religion, gender orientation, national origin, age, marital or veteran status, or the presence of a non-job-related medical condition or handicap.

With the exception of Equal Opportunity posters regarding employment, including those with disabilities posted in the Town Hall, the Town of Northbridge does not appear to have any formal reasonable accommodation or modification of programs or services policy in place. In addition, there are no policies available on the Town's website.

Although there are no formal reasonable modifications in policies, practices and procedures in place; interviews with staff members while conducting site accessibility survey visits indicate that department heads, committee/commission chairs, staff, and elected officials are willing to assist residents or visitors if they request it.

#### Recommendations

Change the word “handicap” to “disability” in the Town’s online Application for Employment Form.

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

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

Under the ADA, a person is considered a qualified individual with a disability if s/he can perform essential functions of the job with or without a reasonable accommodation. Although the ADA does not require an employer to have job descriptions, they can be used as evidence of the essential functions of the job. Job descriptions should be up-to-date and should differentiate between the essential and the marginal duties of the position.

#### **Northbridge 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.

#### Town Employment Application Ad

The following statement appears at the bottom of online job ads in the Town of Northbridge website: *“The Town of Northbridge is an Affirmative Action/Equal Opportunity Employer”.*

#### Town of Northbridge Employment Application (required to be submitted for all positions).

The following verbiage appears near the top of the of the employment application:

*“Applicants are considered for all positions without regard to race, color, religion, gender orientation, national origin, age, marital or veteran status, or the presence of a non-job-related medical condition or handicap”.*

#### Job Descriptions

Ten out of fourteen submitted job descriptions had the following verbiage under Physical Requirements: *“Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions”.*

The Part Time Bus Driver (COA) job description has the following sentence: *“To drive the Senior Center Bus in order to provide transportation services to seniors and handicapped citizens of the Town of Northbridge”.*

Seven of the fourteen job descriptions had the words *“Regularly required to walk, stand”* under Physical Requirements even though the paragraph starts with *“Minimal physical requirements in an office setting”*.

#### Recommendations

Change the word “handicap” to “disability” in the Town of Northbridge Employment Application.

Change the language “handicapped citizens” to “citizens with disabilities” in the Part Time Bus Driver (COA) job description.

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

#### Physical Requirements Suggested Wording

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

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

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

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

When weather conditions such as snow and ice limit or prevent access to services, programs, and activities to or within a facility, access must be maintained to ensure that those programs are accessible. Maintenance of accessible features includes the removal of snow from accessible parking spaces; curb ramps, accessible routes of travel, and entrances. Although temporary interruptions in services due to

bad weather are expected, alternate services must be provided if snow and ice cannot be cleared in a timely manner. Snow removal and removal of other obstructions within the accessible route of travel must be done to a minimum width of 36". Similarly, if an automatic door opener, elevator, lift or similar accessible-related device is not working properly and is denying access, repairs must be made in a timely manner. In the interim, alternative services must be provided.

#### Northbridge Self-evaluation.

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

- Accessible routes of travel that were not maintained during winter conditions resulting in snow covered curb ramps, walkways, and ramps.
- Interior and exterior doors with excessive operating forces and closing speeds.
- Missing elements such as tactile designation signage.
- Missing protective equipment or insulation on sink plumbing.
- Plowed snow piled in the accessible parking spaces.
- Classroom and prep room accessible sinks typically had items stored in the knee clearance area under the sink restricting wheelchair use.
- Accessible counter spaces being used for storage, making them unavailable for people who use wheelchairs.
- Accumulation of debris in curb ramps and sidewalks.
- Vegetative overgrowth in sidewalks restricting the minimum required clear width.

#### Recommendations

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

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

Local governments must ensure effective communication with individuals with disabilities. To ensure that communications with individuals who have hearing, vision or speech impairments, municipal governments must provide appropriate auxiliary aids. The type of auxiliary aids or services necessary to ensure effective communication will vary according to the type of communication involved and the needs of the individual. Auxiliary aids include such services or devices as sign language interpreters, assistive listening headsets, television captioning and decoders, telecommunications devices for people who are deaf such as TDD's or video phones, use of 711 telephone interpreter service, readers, Brailled materials, documents on electronic format, audio recordings and large print materials. In addition, telephone emergency services including 911 must provide direct access to individuals with speech and hearing impairments.

Municipal governments are not required to provide auxiliary aids or take any actions that would result in a fundamental alteration in the nature of a service, program, or activity or that will result in undue financial and administrative burdens. However, alternative auxiliary aids that do not result in a fundamental alteration or undue burden must be provided. For example, it is not necessary to provide sign language interpreters for all interactions with persons who are deaf or hard of hearing. Daily

interaction may suffice through written notes or similar exchanges. However, public meetings, interrogations by local police officers, or similar technical interactions will most likely require interpreters or assistive listening systems. It is required that alternative auxiliary aids be available that does not result in financial or administrative burdens yet meet the needs of the individual with a disability.

#### Northbridge Self-evaluation.

Based on what was submitted in response to the ADA Self-Evaluation survey as well as viewing policies and available materials on the Town's website, 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.

#### Auxiliary Aids

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.

It is recommended that the Town of Northbridge add the following to the 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."*

#### Effective Communications

Answers to the survey question "Briefly describe general office/service communications. Specifically, how is information disseminated and communicated? Are there assistive devices or auxiliary aids (i.e. TTY, TDD, sign language interpreter) which are used or available?" were mostly none being used, not aware of any or no auxiliary devices being used.

The Whitinsville Social Library has the following auxiliary related available for patrons with a Library card:

- Books on CD/Audio Books
- Large Print Books
- Kindles available to borrow
- Talking Book Library are available through the Worcester Public Library

#### Recommendations

If the Town of Northbridge does not have a portable Assisted Listening System, then one should be considered for purchase and used as deemed appropriate for all town services and programs. It is recommended that the Town of Northbridge add the following to its meeting agendas: *"If you need auxiliary aids and services for effective communication (such as a sign language interpreter, an assistive listening device or print material in digital format) or a reasonable modification in programs, services, or activities, contact the ADA Coordinator as soon as possible preferably [xx] days before the activity or event."*

### Virtual Meetings

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

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

Selecting a Platform. After determining which platforms meet an entity’s operational needs, the entity should consider selecting the platform that provides the highest level of accessibility. Consult with vendors and review their accessibility statements which offer insight into how various users with disabilities would interact with the platform. Find out how the system would work with CART, an ASL interpreter, or closed captioning or if a screen reader or strictly keyboard user could access features such as screen share, chat, and video recording. If an entity has identified a platform that meets its operational objectives but has inaccessible features the entity should determine which barriers are likely to prevent access and whether those features are critical. If the identified barriers are not critical then the entity should avoid using those features during the meeting/presentation. For those components deemed to be critical but not accessible, the entity should explore alternative ways that a participant with a disability can effectively participate in the meeting/presentation.

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

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

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



<https://gov.texas.gov/organization/disabilities/accessibledocs>.

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

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

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

#### Best Practices

- Do a trial run. If you have already identified employees who need to use accessible features of a platform, ask them to test it with you.
- Determine which features will be used in the meeting/presentation and include details about how to use those features on the meeting/presentation invitation or reminder. For example, provide a list of commonly used shortcut keys that can be used on the platform or any specific instructions that pertain to users of assistive technology.
- When sending a meeting reminder, include the link to CART so the user can access the meeting link and the link to the CART platform in one place.
- Send out accessible meeting materials in advance.
- Become familiar with the features of the platform, including the accessible features and share them with participants. This could include providing a link to CART in the chat window, offering a brief overview of how to interact with the platform at the beginning of the meeting/presentation, and providing these types of verbal instructions for the duration as features are being utilized.
- Utilize closed captioning features when and if available.

- If the meeting/presentation will be recorded, advise attendees at the start. Inform the CART reporter in advance if you want a copy of the transcription.
- When using ASL make sure that the video remains prominently visible onscreen throughout the meeting/presentation. Depending on the platform, this may require asking participants to turn off their video to ensure that the interpreter can be seen or possibly be displayed more prominently.
- If audio quality is an issue, consider requesting that participants turn off the video feature if it is not essential to participation.
- When using screen share or presenting materials on screen, provide a verbal explanation of what is being displayed so that those participating by phone or those who are unable to see the document or review the materials with assistive technology will be better able to follow along.
- If you are planning on using a video as part of your training or presentation curriculum then it should have audio description or the visual aspects of the video should be described before or in between the dialogue of the video by a person on the training team.

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

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

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

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

b) Documents Are Not Posted In an Accessible Format. Municipalities will often post documents on their websites using Portable Document Format (PDF). However, PDF documents, or those in other

image based formats, are often not accessible to blind people who use screen readers and people with low vision who use text enlargement programs or different color and font settings to read computer displays. The solution would be to always provide documents in an alternative text-based format, such as HTML or RTF (Rich Text Format), in addition to PDF. Text-based formats are the most compatible with assistive technologies.

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

d) Videos and Other Multimedia Lack Accessible Features. Due to increasing bandwidth and connection speeds, videos and other multimedia are becoming more common on the websites of local governments. Today, some government entities use their websites to post training videos for their employees, feature automated slide shows of recent public events, and offer video tours of local attractions. These and other types of multimedia can present two distinct problems for people with different disabilities. People who are deaf or hard of hearing can generally see the information presented on web pages. However, a deaf person or someone who is hard of hearing may not be able to hear the audio track of a video. On the other hand, persons who are blind or have low vision are frequently unable to see the video images but can hear the audio track. The solution is to incorporate features that make them accessible to everyone. Provide audio descriptions of images (including changes in setting, gestures, and other details) to make videos accessible to people who are blind or have low vision. Provide text captions synchronized with the video images to make videos and audio tracks accessible to people who are deaf or hard of hearing.

e) Other Considerations When Developing Websites Include:

- include a "skip navigation" link at the top of web pages that allows people who use screen readers to ignore navigation links and skip directly to webpage content;
- minimize blinking, flashing, or other distracting features;
- if they must be included, ensure that moving, blinking, or auto-updating objects or pages may be paused or stopped;
- design online forms to include descriptive HTML tags that provide persons with disabilities the information they need to complete and submit the forms;

- include visual notification and transcripts if sounds automatically play;
- provide a second, static copy of pages that are auto-refreshing or that require a timed-response;
- use titles, context, and other heading structures to help users navigate complex pages or elements (such as web pages that use frames).

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

- [www.w3.org/WAI/fundamentals/accessibility-intro/](http://www.w3.org/WAI/fundamentals/accessibility-intro/)
- <https://webaim.org>
- [www.ada.gov/pcatoolkit/chap5toolkit.htm](http://www.ada.gov/pcatoolkit/chap5toolkit.htm)
- [www.webaccessibility.com](http://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](http://www.mass.gov/mcbJohn.Oliveira@state.ma.us)  
617-626-7509 Voice  
617-422-0419 Fax

#### **Northbridge Self-evaluation.**

A visually impaired individual using the JAWS 2022 Screen Reading software (see Note below) was able to easily navigate the Town of Northbridge’s website, including the individual departments and committee/commission web pages.

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

In most cases, font sizes and color contrasts appear to be acceptable. Documents (minutes, reports, policies) that were reviewed had a zoom magnifier allowing visually impaired users to change font size and enhance the image. Most of the photos however did not have text under the photo as an identifier.

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.

#### **Northbridge Self-evaluation.**

##### **Emergency Operations Plan**

The Board of Health is actively engaged in preparing an Emergency Operations Plan (EOP) that will address how we handle different emergency situations such as the operation of an emergency dispensing site, shelter operations, and response to infectious disease, natural disaster, or chemical, biological, radiological, nuclear or environmental hazards. This plan, when completed, will be a collaborative effort of our public safety and emergency management departments.

##### **Emergency Dispensing Sites**

The Board of Health has completed a comprehensive plan for the operation of an Emergency Dispensing Site (EDS). An EDS would be utilized to vaccinate or distribute antibiotics to the residents of Northbridge in the event of a communicable disease outbreak, flu or other type of pandemic event, or an act of terrorism.

The objective of the EDS plan is to initiate operations within 24-hours of notification of an event and to provide initial treatment to 100% of the population within 48 hours.

The Massachusetts Department of Public Health (MDPH) has provided guidance and funding to the cities and towns through Regional Host Agencies to assist in Emergency Preparedness and Planning.

The Northbridge Board of Health is seeking volunteers to provide help in case of an emergency with training exercises on what to do if and when a disaster occurs such as providing services at Emergency Dispensing Sites. In addition to the Northbridge Board of Health recruitment of volunteers, the Greater Grafton Medical Reserve Corp (GMRC) has invited the towns of Northbridge, Sutton, and Westboro to participate in their Medical Reserve Corp (MRC).

The Board of Health web page also contains the following helpful links:

- [\\*New\\* STAY AWARE. BE PREPARED](#)
- [\\*New\\* EMERGENCY CARE PLANNING FOR CYSHN DURING COVID 19 AND BEYOND](#)
- [\\*New\\* PREPARING FOR CARING DURING COVID 19](#)
- [MA Responds](#)
- [Northbridge Emergency Preparedness Handbook](#)
- [Region 2 Public Health Emergency Preparedness Coalition](#)
- [Make a Family Emergency Plan](#)

#### Emergency Preparedness

The Northbridge Emergency Handbook is a 16 page booklet that contains a comprehensive guide in preparing for emergencies and what to do if a disaster of any type happens, including numerous Resources and Links (Phone numbers & web address).

In addition, this booklet contains a chapter on Preparedness for “Populations with Unique Needs”. This chapter covers preparation tips for residents who have physical, medical, sensory or cognitive disabilities, as well as the elderly and other populations with unique needs.

The Fire Department web page has a link to the same Emergency Preparedness Handbook that is available on the Board of Health web page.

The Police Department website has a link to CodeRED that enables residents fill out an online form to be notified by your local emergency response team in the event of emergency situations or critical community alerts. Examples include: evacuation notices, bio-terrorism alerts, boil water notices, and missing child reports.

#### Recommendations

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

### **Polling Places**

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

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

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

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

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

#### **Northbridge Self-evaluation.**

According to the Town Clerk, polling occurs at the Northbridge High School Gym. Early voting takes place at the Town Hall either at the Great Hall, Select Board’s room or at a conference room across from the Town Manager’s office depending on the expected turnout. The Town Clerk also states that the AutoMARK Voter Assist Terminal screen on this device faces away from view of the voting public which ensures complete privacy and independence. The AutoMARK Voter Assist Terminal is an electronic ballot marker designed for use by people who are unable to manually mark an optical scan ballot due to physical impairments, visual impairments or language barriers. This voter assist terminal is available at both early and election day voting.

Both the Town Hall and the High School are accessible for people who use wheelchairs. See Chapter XIII Municipal Building Assessments for detailed accessibility survey results.

## **XII. ADA TRANSITION PLAN**

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

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

### **Limitations of the Transition Plan and Compliance**

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

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

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

#### **2010 ADA Standards**

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

#### **521 CMR**

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



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

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

The plan does not address what is accessible, but rather obstructions to mobility. Fieldwork was performed in the Spring of 2021. Although general recommendations are made as corrective actions to eliminate identified obstacles, it is expected that the town will be solely responsible for designing the specific construction solution in accordance with 521 CMR: Architectural Access Board Regulations or the 2010 ADA Standards for Accessible Design, whichever is appropriate.

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

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

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

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

### **Use of the Transition Plan**

This plan is intended to be a working document. If a barrier was overlooked it can easily be added to the plan. Programs and services can be modified and adapted over time as needed. Similarly, policies and procedures can be modified and adopted to reflect current legislative requirements. Actual construction methods to arrive at a solution for an identified problem may vary depending on final plans and specifications. The town should use this plan as a guide for compliance and modify it as needed without altering its initial intent and efforts of compliance. In addition, the inventory of barriers can be used in concert with the town's capital budget process to assist in the determination of how and when to proceed with the many suggested improvements.

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

### **Priority(P)**

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

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

### **Feasibility(F)**

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

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

### **Time-frame(TF)**

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

<u>Time-frame</u>	<u>Description</u>
I	Immediate Term (2022-2023)
N	Near Term (2024-2027)
L	Long Term (2028-2031)

### **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 2<sup>nd</sup> 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:** Town Hall, Town Hall Annex, Police Station, Main Fire Station, Fire Station #2, Highway Division, Sewer Division, Senior Center, Whitinsville Social Library, Veteran's Hall, Former Northbridge Elementary School, Northbridge Elementary School, Northbridge Middle School, Northbridge High School.

**Active and Passive Recreation Areas:** Conservation/Passive Recreation Areas, Town Common/Memorial Square, Cross Street Toto Lot, Plummer Park, Rockdale Memorial Park, Linwood Field, Elementary School Playground and Fields, Lasell Field and Baseball Fields, High School Fields.

### **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

### **XIII. MUNICIPAL BUILDING ASSESSMENTS**

TOWN HALL  
TOWN HALL ANNEX  
POLICE STATION  
MAIN FIRE STATION  
FIRE STATION #2  
HIGHWAY DIVISION  
SEWER DIVISION  
SENIOR CENTER  
WHITINSVILLE SOCIAL LIBRARY  
SCHOOL ADMINISTRATION BUILDING  
VETERAN'S HALL  
FORMER NORTHBRIDGE ELEMENTARY SCHOOL  
NORTHBRIDGE ELEMENTARY SCHOOL  
NORTHBRIDGE MIDDLE SCHOOL  
NORTHBRIDGE HIGH SCHOOL

## **NORTHBRIDGE TOWN HALL**

**Description of Facility and Programs:** Northbridge Town Hall is a 3-level (Ground Level, Level 1, Level 2), roughly 28,000 sf masonry building that was constructed in 1872. Since that time the town hall has undergone various renovations and improvements including the installation of an elevator to access all levels of the building.



**Responsible Party:** Board of Selectmen.

**General Description or Obstacle Which Limits Mobility or Access:** The town hall is moderately accessible compliant but does have some significant areas of non-compliance.

### **Exterior General**

The designated accessible passenger vehicle space has a cross slope in excess of 2.0% and signage that is too low. The payment box at the accessible entrance is too high. The Main Street and Douglas Road entrances have stairs with railings that are not fully round or oval. As the railings appear to be original, a historic variance should be sought, if required, to retain the existing railings. The Douglas Road entry is locked and serves only as an emergency egress, therefore, no further action is required.

The First Floor entrance on Pleasant Street has railings which lack bottom extensions. As the railings are historic and the door is secured and not used as a means of access or egress, a variance should be sought to retain the existing railings without further modification.

### Interior General

Interior doors have non-compliant hardware and lack tactile designation signage. Some of the mounted tactile designation signage is too low. Doors with closers have excessive opening forces and close too fast. Ground level ceiling mounted signage serves as protruding objects. Some interior doors with glass panes exceed the maximum height for a viewing pane. Meeting room tables lack compliant knee compliance. The Level 1 “low” drinking fountain is 1” too low and therefore lacks compliant knee clearance. A number of light switches throughout the building are not within reach range. A floor grate in the Selectmen’s Meeting Room has openings that are too wide.

### Interior Stairs and Railings

With the exception of the newer stairwell near the elevator, the older stair railings throughout vary with inside railings historic in nature and outside railings appearing to newer. In addition, railings lack top and bottom extensions. The inside railings are not fully continuous, the railing widths exceed the maximum allowed, and the railing shapes are not consistently round or oval in shape.

### Doors to Offices and Interior Work Areas

The door to the Ground Level Retirement Office as well as Ground Level Interior Office Doors (Retirement, Assessor’s, Treasurer/Collector) do not meet the minimum required clear width for a door opening.

### Office Bathrooms

The Treasurer/Collector’s Office has a sink/kitchenette for staff use that is 2” too high and lacks knee clearance. In addition, there are 2 private office bathrooms that are wholly non-compliant due to the lack of maneuverability, heights, set-backs, clearances, the lack of grab bars, the lack of sink knee clearance, a non-compliant shower, sink faucets that require pinching and twisting of the wrist, and other related items. As this bathroom is used solely by and at the discretion of the Office Staff, no other action is required for these areas at the present time, unless necessitated by a reasonable accommodation request.

### Public Bathrooms

The Bathrooms (Ground and Level 1) have minor areas of non-compliance. The Ground Level Bathrooms have coat hooks and soap dispensers that are too high; sink piping that is not fully wrapped; metered faucets that have excessive operating force; grab bars that are too high; toilet paper dispensers that are too close to the front of the water closet; and toilet seat cover dispensers that are too high and located over the grab bars.

The Level 1 Men’s Bathroom sink is too low; has the water closet flush control on the wrong side; a toilet seat cover dispenser that is too high and located over the grab bar; and a cart that restricts the clear width in front of the water closet. The Level 1 Women’s Bathroom has a toilet seat cover dispenser that is too high and located over the grab bar and a cabinet and a chair that restricts the clear widths on the far side and in front of the water closet.

### Great Hall

The Level 2 Great Hall consists of an assembly area with a stage and a mezzanine. The Great Hall is used for polling, meetings, and other related activities. It includes a stage and rooms and stairs behind the stage. With the exception of the side office for the IT Director, it appears that the rooms behind the stage are used primarily for storage and are not open to the public.

There is no accessible route of travel from the “assembly area” to the stage. The 4 sets of stairs to the stage (including from the IT Office) lack railings.

There is no vertical access to the Mezzanine area. The 2 sets of stairs to this area lack compliant railings as they are not fully continuous on the interior; have interior railings that are 7” wide, which exceeds the maximum allowed by 5”; have railings that are too low, and which lack top and bottom extensions.

#### Assistive Listening System

It does not appear that the town has an assistive listening system (ALS) for persons who are hard of hearing as no signage was present in the Level 1 BOS meeting room or in the Level 2 Great Hall. It is recommended that an assistive listening system for shared use in other municipal locations be provided per S.219 and S.706 of the 2010 ADA Standards. Signs informing persons of the availability of the assistive listening system should be posted in a conspicuous location. Signage must comply with S.216.10 and S.703 of the ADAAG and must include the International Symbol of Accessibility for Hearing Loss. Depending on the type of system purchased and the number of users, costs could vary from \$3,500 to \$5,500 (or more). Information on the availability of the equipment should be posted on the town’s website and in the meeting room and Great Hall. Staff should also be trained on operation of the ALS device.

### **Town Hall Accessibility Assessment**

General Description of Obstacle	2010 ADAAG	MAAB 521 CMR	Type of Action to be Taken	P	F	TF	Cost Estimate
<b><u>Accessible Parking</u></b> Signage for the passenger vehicle space is 3” too low. In addition, the cross slope of the space is 3.2%, which exceeds the maximum allowed of 2.0%.	502.6 502.4	23.6 23.4	Signage must be reset such that 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  When the parking lot is resurfaced, ensure that the designated accessible spaces and access aisles have running and cross slopes that do not exceed 2.0%.	1  1	2  3	I  L	\$0  TBD
<b><u>Payment Box</u></b> The drop area for the payment box is 4” too high.	308.2 308.3	6.5 6.6	Lower the payment box so that the opening for the envelope drop is no more than 48” a.f.f. (2010 ADA Standards).	1	3	N	\$0
<b><u>Front and Side Entrances</u></b> <b><u>Front Main Street Stairs</u></b> The railings are not fully round or oval in shape.	505.7	27.4.5	Seek a variance under “historic considerations” to retain the existing stair railings.	1	1	I	\$0
<b><u>Douglas Road Entrance and Stairs</u></b> The railings are not fully round or oval in shape.			Continue to use this entrance as an emergency egress only and not as a public entrance.	1	1	I	\$0
<b><u>Interior Doors with Closers</u></b> Exterior and interior doors (including bathrooms) 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	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

6 seconds. Operating forces for the Main Street exterior door was 16 lbs. and the closing speed was 4 to 5 seconds. Operating forces for interior doors vary up to 20 lbs. with closing speeds as quick as 2 to 3 seconds.							
<p><b><u>Door Hardware</u></b> The following interior doors have non-compliant knob style hardware:</p> <p><b><u>Ground Level</u></b></p> <ul style="list-style-type: none"> <li>• Assessors</li> <li>• G-3 (Retirement)</li> <li>• G-4</li> <li>• Storage at stairs</li> <li>• Door to Retirement by stairs</li> <li>• Treasurer/Collector interior (5 doors)</li> <li>• Assessor's interior (5 doors)</li> </ul> <p><b><u>Level 1</u></b></p> <ul style="list-style-type: none"> <li>• Law book closet</li> <li>• BOS Meeting Room to Town Manager Front Office</li> <li>• BOS Meeting Room to Town Manager Office</li> <li>• Door between Town Manager Front Office and Town Manager Office</li> <li>• 1-1 Meeting Room</li> <li>• Town Manager Front Office from hallway</li> <li>• Town Manager closet</li> </ul> <p><b><u>Level 2</u></b></p> <ul style="list-style-type: none"> <li>• Town Clerk</li> <li>• Town Accountant</li> <li>• Door by rear access to Level 2</li> <li>• Rear hallway door to Accountant's Office</li> <li>• Rear hallway door to Town Clerk's Office</li> <li>• Hallway door to Accounting</li> <li>• Town Clerk interior (3 doors)</li> <li>• Town Accountant interior (2 doors)</li> </ul> <p><b><u>Level 3</u></b></p> <ul style="list-style-type: none"> <li>• IT from Great Room</li> <li>• IT closet</li> <li>• 3 sets double doors to Great Room</li> </ul> <p>In addition, there are 7 doors behind and to the stage which have knob hardware.</p> <p>See Photo Town Hall 1.</p>	404.2	26.11	<p>Install lever-style or similar accessible compliant hardware on the interior doors.</p> <p>Restrict access to the area behind the stage. Replacement of hardware on these 7 doors would only be required if the area was opened to the public and/or as a result of a reasonable accommodation request.</p> <p><i><u>Note:</u> Depending on the door and type/quality of hardware, lever hardware may vary from \$75 to \$275 per unit. The estimate provided is at the mid-range (\$150) for the interior doors.</i></p>	2	2	1	Up to \$4,825+



<p><b><u>Door Signage</u></b> The following interior doors lack tactile accessible signage:</p> <p><b><u>Ground Level</u></b></p> <ul style="list-style-type: none"> <li>• Door to Treasurer/Collector Room G-7(Meeting Room)</li> <li>• Assessors (2 doors)</li> <li>• G-3 (Retirement)</li> <li>• G-4</li> <li>• Storage at stairs</li> <li>• Door to Retirement by stairs</li> <li>• Treasurer/Collector interior (9 doors)</li> <li>• Assessor's interior (5 doors)</li> </ul> <p><b><u>Level 1</u></b></p> <ul style="list-style-type: none"> <li>• Law book closet</li> <li>• BOS Meeting Room to Town Manager Front Office</li> <li>• Door to side exit from the Great Hall</li> <li>• BOS Meeting Room to Town Manager Office</li> <li>• Door between Town Manager Front Office and Town Manager Office</li> <li>• 1-1 Meeting Room</li> <li>• Town Manager closet</li> </ul> <p><b><u>Level 2</u></b></p> <ul style="list-style-type: none"> <li>• Door by rear access to Level 2</li> <li>• Rear hallway door to Accountant's Office</li> <li>• Rear hallway door to Town Clerk's Office</li> <li>• Hallway door to Accounting</li> <li>• Town Clerk interior (3 doors)</li> <li>• Town Accountant interior (2 doors)</li> </ul> <p><b><u>Level 3</u></b></p> <ul style="list-style-type: none"> <li>• 3 sets double doors to Great Room</li> <li>• IT from Great Room</li> <li>• IT closet</li> </ul> <p>In addition, the following signs are at the incorrect height:</p> <ul style="list-style-type: none"> <li>• Town Manager Front Office from hallway (47" o.c. a.f.f.)</li> <li>• Room 1-3/BOS Meeting Room (53½" o.c. a.f.f.)</li> <li>• Town Clerk (57" o.c. a.f.f.)</li> <li>• Registrars of Voters (62" o.c. a.f.f.)</li> <li>• Town Accountant (49½" o.c. a.f.f.)</li> </ul> <p>The Registrars of Voters sign and the Town Accountant sign are not located on the latch side of the door to each</p>	703	41.1	Install and/or relocate accessible compliant signage on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Under 521 CMR, signage s/b 60" a.f.f. to the centerline of the sign. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	2, 3	2	1	Up to \$7,875+
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specific office, but rather at a hallway entrance door.  <b>See Photos Town Hall 2, 3, and 4.</b>							
<b>Protruding Objects</b> <ul style="list-style-type: none"> <li>Ground Level "Adjustment" sign hanging from ceiling (74½" a.f.f)</li> <li>Ground Level "Payments" sign hanging from ceiling (74½" a.f.f)</li> </ul> <p>Protruding objects extend more than 4" into the accessible route of travel between a height of 27" and 80" a.f.f. or have vertical headroom clearance reduced to less than 80".</p> <b>See Photo Town Hall 4.</b>	307.2	20.6.1	Raise the signs to a height of at least 80" a.f.f. to the bottom of the signs.	2	2	I	\$0
<b>Reach Range</b> The following exceed the maximum reach range under the 2010 ADA Standards: <ul style="list-style-type: none"> <li>Town Clerk light switch (50" a.f.f.)</li> <li>Town Accountant light switch (51" a.f.f.)</li> <li>BOS Meeting Room 3 light switches (56" a.f.f.)</li> <li>Level 2 lobby coat rack (65" a.f.f.)</li> </ul>	308.2 308.3	6.5 6.6	As feasible, lower the light switches to a height of no more than 48" a.f.f.  Provide a coat rack or coat hook at a height of no more than 48" a.f.f.	4  4	3  2	L  I	Up to \$1,000  \$10 to \$50
<b>Drinking Fountain</b> The First Floor "low" drinking fountain provides only 26" of knee clearance.	306.3	36.2	Raise the "low" fountain at least one inch to achieve the minimum required 27" knee height clearance.	2	3	N	Up to \$500+
<b>Doorway Widths</b> The doorways to the following rooms/locations have clear widths that vary from 24" to 31" which do not meet the minimum 32" clear width requirement for a doorway: <ul style="list-style-type: none"> <li>G-3/Retirement (30")</li> <li>G-4 (27")</li> <li>Ground Level Storage (27")</li> <li>Treasurer/Collector (31")</li> <li>Treasurer/Collector bathrooms (24")</li> <li>Treasurer/Collector kitchen (29") and office (30")</li> <li>Assessor's interior 3 doors (28" to 30")</li> <li>Town Clerk interior (2)</li> </ul>	404.2	26.5	With the exception of the Treasurer/Collector's Office and the Retirement Office, all other doorways are not open to the public and are staff use only.  Seek a variance to retain the existing 29" and 30" wide Retirement and Treasurer/Collector's Office doorways.  Modify the remaining doors only as may be required as a reasonable accommodation request.	2	1	I	\$0
<b>Doors with Glass Panes</b> The following doors have glass panes that exceed the maximum viewing height of 43" ( <i>Note: A tolerance of 1" is allowable up to a maximum height of 44" a.f.f.</i> ): <ul style="list-style-type: none"> <li>Ground Level hallway door near elevator</li> </ul> <b>See Photo Town Hall 5.</b>	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.  Option #1: Frost or block the glass pane.  Option #2: Modify or replace the door so that the glass pane is no more than 43" a.f.f.	2  2	2  3	N  N	\$0  \$500 to \$1,000+



<b><u>Stairs and Railings</u></b> With the exception of the newer stairs next to the elevator, the older historic stairs and railings connecting the Ground, Second Floor, and Third Floor Levels are non-compliant.  <u>Ground Level to First Floor Level Near Retirement Office/Exit and Level 1 to Level 2 Near Accounting</u> The stairs have 8" risers which are 1" too high. The railings are 24" to 33" a.f.f. and 39" to 48" a.f.f. which is not within the acceptable height range of 34" to 38" a.f.f.; are too wide and not round or oval in shape; lack extensions; are not continuous for the inside railing; and do not have railings the full length of stairs.  <u>Historic/Original Interior Stairs</u> Interior stair railings are non-compliant as they do not have extensions at the top and bottom, exceed the maximum allowed width, are not continuous, and vary in height.  See Photos Town Hall 10 and 11.	504 505	27	Option #1: Restrict access and limit to employee or emergency use only.  Option #2: Reconstruct the staircases to comply with Sections 504 and 505 of the 2010 ADA Standards and 521 CMR as follows:  Stair riser heights should not exceed 7" in height. Stair railings s/b on both sides of the stairs. Railings s/b between 34" – 38" a.f.f. to the top of the railing, circular or oval in x-section, 1½" – 2" in outside diameter, and with extensions at the top (12" parallel to the floor) and bottom as feasible (slope distance one tread then 12" parallel to the floor).	2  2	1  3,4	N  L	\$0  TBD – up to \$100K+
	505	27	Seek historic variance under ADA and 521 CMR to maintain existing interior historic railings. Install complaint continuous railings on the wall side of all stairways at a height of 34" – 38" to the top of the handrails, round or oval in x-section and between 1½" – 2" in outside diameter, and with extensions at the top 12" parallel to the floor and the slope distance on one tread then 12" parallel to the floor at the bottom.	2	1,2	N	Up to \$2,000+
<b><u>Ground Level Accessible Bathrooms</u></b> Men's and Women's The coat hooks are 6½" too high under the 2010 ADA Standards.  The soap dispensers are outside the zone of reach under 521 CMR by 9" to 10".  The sink piping is not fully wrapped, insulated, or guarded.  The sink self-metered faucets have excessive operating forces of 10 to 12 lbs.  The toilet seat cover dispensers are 9" too high and located over the grab bars.  The grab bars are 1" too high. <i>Note: There are no tolerances for a range of dimensions.</i>  The toilet paper dispensers are 7" too close to the front of the water closets.  See Photo Town Hall 12.	308.2 308.3	6.5 6.6	Lower at least one coat hook to a height of no more than 48" a.f.f.	3	2	I	\$0
	308.2 308.3	30.12	Lower the dispensers to a maximum of 42" a.f.f.	3	2	I	\$0
	606.5	30.9.5	Fully wrap and/or insulate the sink piping.	3	2	I	\$100
	606.4	30.9.5	Modify/adjust the faucets so that the operating forces do not exceed 5 lbs.	3	2	I	\$0
	604.7 308	30.12 30.8.5	Relocate the dispensers so they are no more than 42" a.f.f. and not over the grab bars.	3	3	I	\$0
	609 604.5	30.8	Lower the grab bars such that the top of the gripping surfaces are 33" to 36" a.f.f.	3	2	I	\$0
	604.7	30.7.6	Relocate the toilet paper dispensers so they are a minimum of 7" and a maximum of 9" in front of the water closet measured to the centerline of the dispenser.	3	2	I	\$0

<b>Level 1 Accessible Bathrooms</b>							
<b>Men's and Women's</b>							
The toilet seat cover dispensers are 10" to 11" too high and located over the grab bars.	604.7 308	30.12 30.8.5	Relocate the dispensers so they are no more than 42" a.f.f. and not over the grab bars.	3	2	I	\$0
The Men's water closet has only 31" clear width in the front due to a cart.	604.2	30.7.2	Remove the objects to achieve the minimum required 42" far side and front clear widths.	3	2	I	\$0
The Women's water closet has only 8" clear width on the far side due to a cabinet and only 20" in the front due to a chair. In addition, the Women's water closet is 1" too close to the near wall.	604.3		Modify/relocate the women's water closet so that it is 18" o.c. from the near wall.	3	3	N	Up to \$500+
<b>Men's Only</b>							
The sink has 26¼" of knee clearance, which is ¾" too low and not within the allowed tolerance.	306.3	30.9.3	Modify or replace the sinks so there is a minimum of 27" of knee clearance.	3	3	N	Up to \$850
The water closet flush control is on the near side and not the wide or approach side.	604.6	30.7.5	Replace the water closet tank or the entire water closet so that the flush control is on the open or approach side.	3	3	I	\$125 to \$350
See Photos Town Hall 13 and 14.							

Total \$34,175 to \$235,150

### **Town Hall Accessibility Assessment Photos**

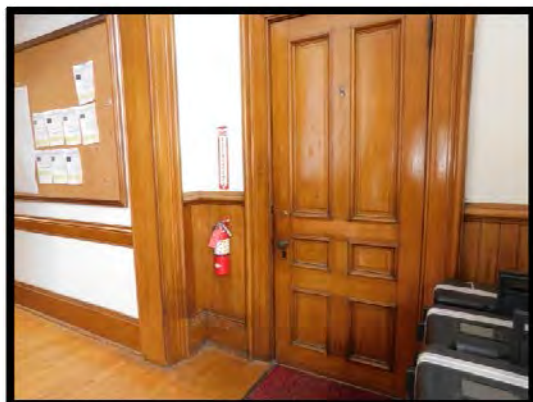


Photo Town Hall 1

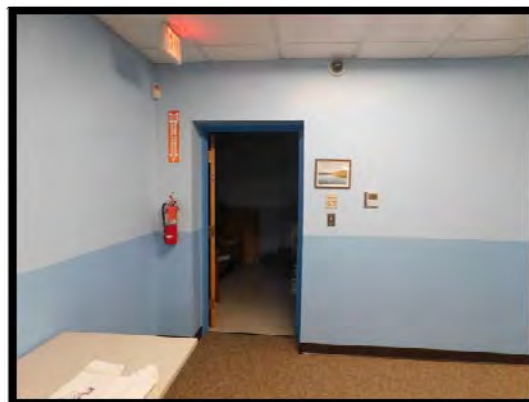


Photo Town Hall 2



Photo Town Hall 3

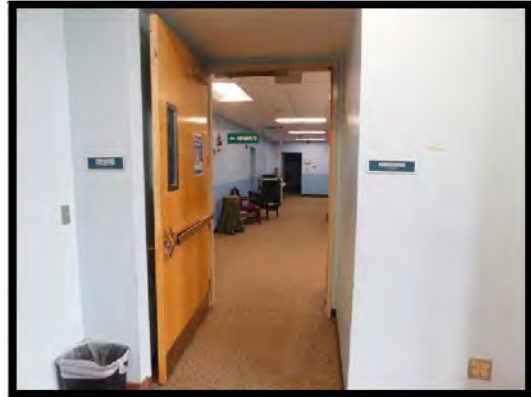


Photo Town Hall 4



Photo Town Hall 5



Photo Town Hall 6



Photo Town Hall 7

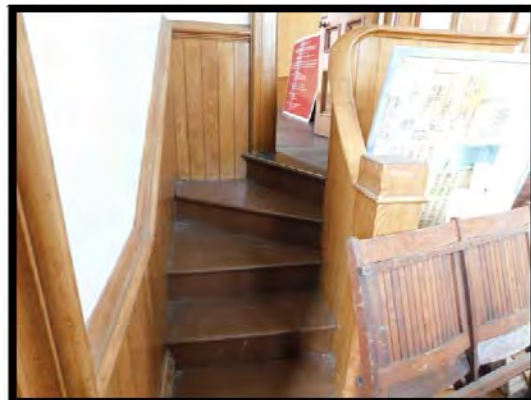


Photo Town Hall 8



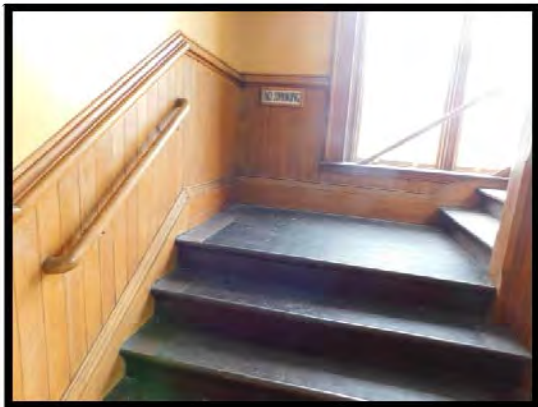


Photo Town Hall 9

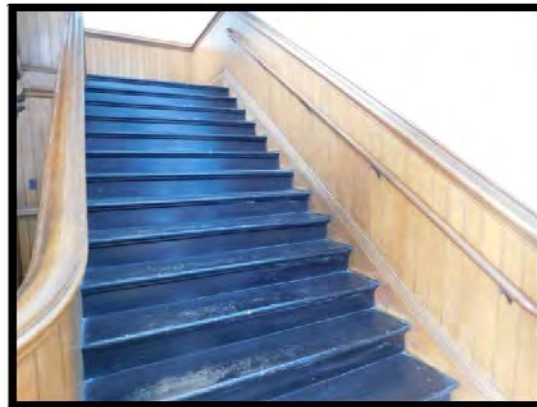


Photo Town Hall 10

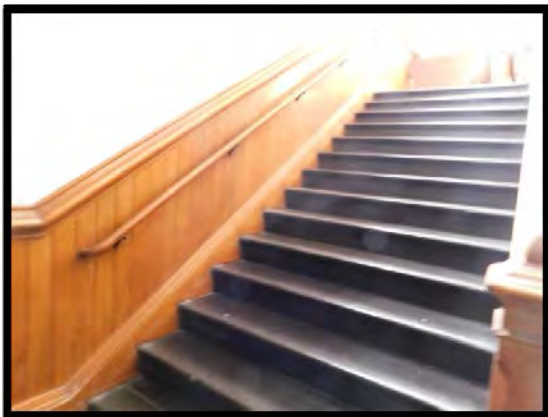


Photo Town Hall 11



Photo Town Hall 12

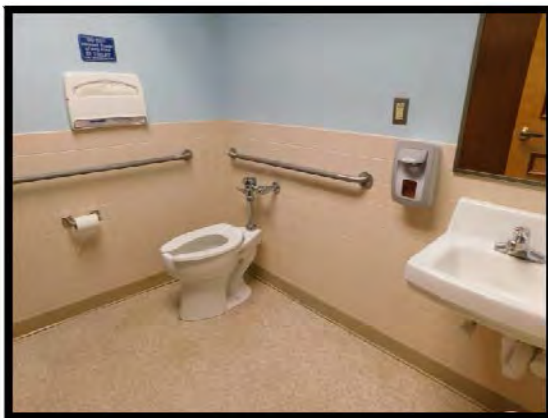


Photo Town Hall 13



Photo Town Hall 14

## **TOWN HALL ANNEX**

**Description of Facility and Programs:** The Town Hall Annex is a 3-level roughly 21,200 sf masonry building that was constructed in 1925, originally serving as a school building. Currently only the first floor level is occupied and houses Veteran's Services, Board of Health, Building/Code Enforcement, Zoning Board of Appeals, Community Planning and Development, Conservation Commission, and the Planning Board. The Basement and the Second and Third Levels are closed to the public.



**Responsible Party:** Board of Selectmen.

**General Description or Obstacle Which Limits Mobility or Access:** The town hall annex is moderately accessible compliant for building access and for the first floor level. There is no vertical access to the second or third levels other than stairs.

### **Exterior General**

The front entrance on Hill Street is not in service with the main entry occurring from the Cottage Street side. The Cottage Street side has 2 entrances including both stairs and a ramp. The stairs have a railing on only one side. The railing doesn't fully extend at the bottom and lacks a level extension at the top. The railings vary in height from 27" to 32" a.f.f. A drop box is provided at the top of the stairs, but no drop box is provided at the top of the ramp.

The ramp surface has deterioration and cracks. The level landing between ramp segments is only 4 feet in width. The ramp has a paired railing only on one side with the upper railing being 1" too low.



### Level 1 Interior General

The interior ramp has a running slope that varies from 8.6% to 9.6%. At the time of assessment a mat was placed over one side of the ramp railings restricting its use. Interior doors either lack tactile designation signage or the signage is improperly mounted. Signage near the non-accessible bathrooms should be provided noting the location of the accessible bathroom. Doors with closers have excessive opening forces and close too fast. Some interior doors have knob hardware. Some doors also have glass panes which exceed the maximum height for a viewing pane. A number of doors/entryways have inadequate clear width. The Board of Health, ZBA/Building Inspector, and Planning/Conservation Commission counters are too high. A hallway work table lacks sufficient knee clearance.

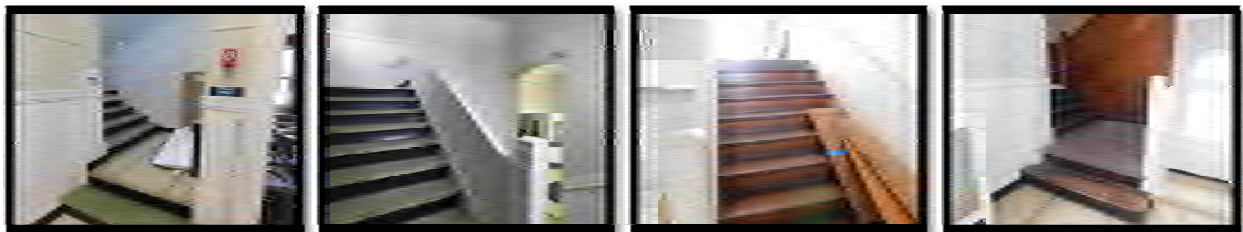
### Level 1 Accessible Bathroom

The sink is 1 ½" too high. The metered faucet has an excessive operating force and does not stay open for at least 10 seconds. The toilet paper dispenser is too far from the front of the water closet. The light switch, coat hook, soap dispenser, and towel dispenser are all too high.

A detailed assessment is provided for those areas currently in use and open to the public. This includes the exterior parking, exterior stairs, and exterior ramp as well as the interior First Floor Level. Only a general description of those area of non-compliance are provided for Levels 2 and 3 (below) as these areas are not open to the public and the building as a whole is intended to be repurposed.

### Stairs to Levels 2 and 3

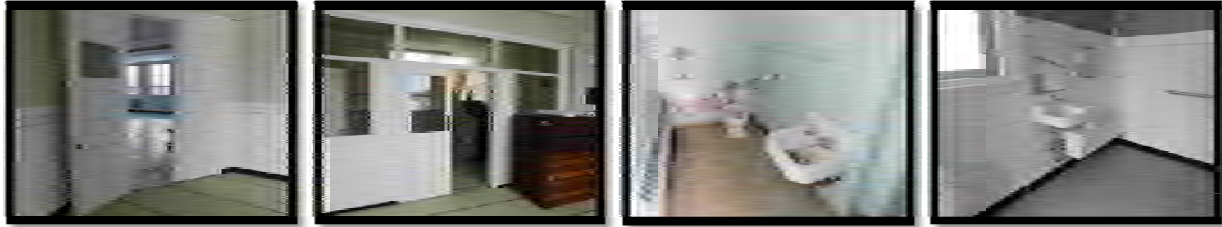
There is no accessible route of travel to the upper levels of the building as the only means of access is via stairs. The stairs to Levels 2 and 3 are non-complaint as the interior railings are not continuous, some railings are not round or oval in shape, some are too wide (up to 2¾") and too low (22" to 32" a.f.f. to the top of the railings), and lack top and bottom extensions. The stairs near the Veterans Services Office and from Level 2 to Level 3 have segments which lack railings on both sides of the stairs.



### Level 2

Five sets of double doors only provide only 28" of clear width when one door is an open position, which is 4" too narrow. Two doors have glass panes that exceed the maximum viewing height by 19". Doors with closers have excessive operating forces (more than 5 lbs.) and close too fast (less than 6 seconds). Sixteen doors lack tactile designation signage and ten doors have non-compliant door knobs. Two apparent former classroom sinks are wholly non-compliant as the sinks lack knee clearance; the sink faucets require pinching and twisting of the wrist; the sink piping is not wrapped; a urinal is too high; the water closets are too low and have inadequate near, far, and front clearances; there are no grab bars; and toilet paper dispensers are improperly mounted. Two classroom sinks lack knee clearance.

The “accessible” bathroom has signage on the door and not the latch side; the light switch and towel dispenser are too high; the sink piping is not wrapped, guarded, or insulated; the water closet is ¾” too low; and the rear grab bar is 2½” too high and 1” too far from the interior corner.



### Level 3

Level 3 is used for storage. Similarly to Level 2, doors lack tactile designation signage, have non-compliant knob hardware, and glass panes that are too high. Doors with closers have excessive operating forces (more than 5 lbs.) and close too fast (less than 6 seconds). A sink lacks knee clearance; has piping that is not wrapped, guarded, or insulated; and faucets that require pinching and twisting of the wrist.

### Vertical Access to Levels 2 and 3

There is no vertical access to Levels 2 and 3. A 3-stop elevator, either internally or as an addition to the existing building, would result in full access to all 3 building levels. Under most construction options additional compliance requirements would be triggered and in the case of the elevator, full code compliance under 521 CMR due to the cost of the renovations vs. the value of the building. This would include the identified areas of non-compliance on Levels 2 and 3, as well as the stairs and railings. Vertical access modifications may also trigger additional structural, electrical, mechanical, fire alarm and possibly plumbing alterations and modifications depending on location and what is required. An electrical upgrade would also be in order to accommodate the powering of the equipment. Accounting for unforeseen costs (15% contingency), demolition, finishes, general conditions including overhead and profit (20%), architect oversight, compliance with prevailing wage, and historic rehabilitation considerations, total probable construction costs would range in excess of \$1 million+. The project architect would also need to consult with both the Massachusetts State Historic Preservation Office as well as the Massachusetts Architectural Access Board to determine what exemptions may be considered and then file the formal variance request as may be required.

## **Town Hall Annex 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>
<b>Front Stairs</b> The railings on the front stairs are located on only one side, do not extend at the top and bottom of the stairs, and are up to 7” too low.  See Photo Annex 1.	505	27	Install complaint railings on both sides of the stairs as follows:  Railings must round or oval in x-section and 1¼” – 2” in outside diameter. Railings should be at a height of 34” to 38” a.f.f. to the top of the handrails. Extensions must be provided the slope distance of one tread then 12” at the bottom of the stairs and 12” parallel to the floor at the top of the stairs.	1	3	N	Up to \$750

<b>Payment Box</b> A payment drop box is located at the top of the “staired” entrance, but not at the “ramped” entrance.	308.2 308.3	6.5 6.6	Provide a payment box at the ramped entrance at a height of no more than 48” a.f.f. (2010 ADA Standards) for the opening.	1	2	I	\$50
<b>Exterior Ramp</b> There are areas of deterioration along the ramp creating abrupt changes in level surface. The ramp has railings on one side only, of which the upper railing is 1” too low. There is only a 4’ level landing (minimum 5’ required) at the ramp change in direction.  See Photo Annex 2.	405 505	24	Modify/reconstruct the ramp to eliminate the areas of deterioration and to create a 5’ level landing at the ramp direction change. Provide paired railings on both sides of the ramp at a height of 34” to 38” a.f.f. (top railing) and 18” to 20” a.f.f. (bottom railing), have an outside diameter of 1½” to 2”, and have 12” extensions at the top and bottom of the ramp parallel to the ground.	1	3	N	Up to \$17,500
<b>Level 1 Door Signage</b> The following interior doors have tactile designation signage that are located at the incorrect height, located in an improper location, or have no signage at all: <ul style="list-style-type: none"> <li>Veterans’ Services (52” a.f.f. o.c.)</li> <li>Building Inspector, Zoning Board of Appeals, Board of Health (38” a.f.f. o.c. and on front of counters)</li> <li>Hallway side door to BOH (no signage)</li> <li>Hallway side door to Planning and Conservation (no signage)</li> <li>Planning (54¼” a.f.f. o.c. and on door)</li> <li>Conservation Commission (49½” a.f.f. o.c. and on door)</li> <li>Planning closet (no signage)</li> <li>Accessible bathroom janitor’s closet (no signage)</li> </ul> <i>Note: Directional signage to the Level 1 accessible bathroom should be provided at or near the men’s and women’s non-accessible bathrooms.</i>  See Photos Annex 3 and 4.	703	41.1	Install and/or relocate 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	\$375
<b>Level 1 Door Hardware</b> The hallway side door to Planning and Conservation has knob-style hardware.	404.2	26.11	Install lever-style or similar accessible compliant hardware.  <i>Note: Depending on the door and type/quality of hardware, lever hardware may vary from \$75 to \$275 per unit. The estimate provided is at the mid range for these doors.</i>	2	2	N	Up to \$150
<b>Level 1 Doors with Glass Panes</b> The following doors have glass panes that exceed the maximum viewing height of 43”(Note: A tolerance of 1” is allowable up to a maximum height of 44” a.f.f.): <ul style="list-style-type: none"> <li>Veterans Services (2 at 49” a.f.f.)</li> </ul>	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.  Option #1: Frost or block the glass panes.	2	2	N	\$50

<ul style="list-style-type: none"> <li>BOH/ZBA/BI (61½" a.f.f.)</li> <li>Planning Conservation (2 at approx. 61½" a.f.f.)</li> </ul> <p>See Photo Annex 5.</p>			Option #2: Modify or replace the door so that the glass pane is no more than 43" a.f.f.	2	3	N	Up to \$2,500+
<p><b>Level 1 Doorway Widths</b></p> <p>The doorways to the following rooms/locations have clear widths that vary from 27½" to 28" which do not meet the minimum 32" clear width requirement for a doorway:</p> <ul style="list-style-type: none"> <li>2 sets lobby/entrance double doors (28")</li> <li>BOH/ZBA/BI (2 at 27½")</li> <li>Planning/Conservation (2 at 27½")</li> </ul> <p>See Photo Annex 6.</p>	404.2	26.5	<p>Option #1: Keep the doors open in a fixed position.</p> <p>Option #2: Modify the doors so that at least one of the doors provides a minimum of 32" clear width when opened.</p>	2 2	1 3	I L	<p>\$0</p> <p>Up to \$8,000+</p>
<p><b>Level 1 Reach Range</b></p> <p>The hallway light switch exceeds the maximum reach range under the 2010 ADA Standards by 6".</p>	308.2 308.3	6.5 6.6	Lower the light switch to a height of no more than 48" a.f.f.	4	3	L	Up to \$350+
<p><b>Level 1 BOH, BI/ZBA, Planning/Conservation Counters</b></p> <p>The 3 counters are 42" to 44" a.f.f., which are 6" to 8" too high.</p> <p>See Photo Annex 4.</p>	904.4	7.2	Construct a 36" long by no more than 36" high a.f.f. counter, with a minimum of 27" of knee clearance at each separate counter.	2	3	N	Up to \$1,050
<p><b>Level 1 Desk/Table Knee Clearance</b></p> <p>The hallway computer desk/table provides only 24¾" knee clearance, which is 2¼" too low.</p>	226.1 306.2 306.3	35	Provide a computer desk/table that has 27" of knee clearance.	2	2	N	\$0 to \$250
<p><b>Level 1 Accessible Bathroom</b></p> <p>The door has an operating force of 15 lbs., which is 10 lbs. too great and a closing speed of 3 to 4 seconds, which is 2 to 3 seconds too fast.</p> <p>The coat hook and light switch are 5" to 6" too high under the 2010 ADA Standards.</p> <p>The soap and towel dispensers are outside the zone of reach under 521 CMR by 2" to 6".</p> <p>The sink is 35½" a.f.f., which is 1½" too high.</p> <p>The sink self-metered faucet has an excessive operating force of 7 lbs. and stays open for only 4 seconds.</p> <p>The toilet paper dispenser is 7" too far from the front of the water closet.</p> <p>See Photos Annex 7 and 8.</p>	404.2.8 404.2.9  308.2 308.3  308.2 308.3  606.3  606.4 309  604.7	26.8 26.9  6.5 6.6  30.12  30.9.2  39.5 30.9.6  30.7.6	<p>Adjust the door closer such that the push/pull force does not exceed 5 lbs. and the door closing speed is at least 6 seconds.</p> <p>Lower the coat hook and the light switch to a height of no more than 48" a.f.f.</p> <p>Lower the dispensers to a maximum of 42" a.f.f.</p> <p>Lower the sink to a height of no more than 34" a.f.f. to the top of the sink rim.</p> <p>Modify/adjust the faucet so that the operating force does not exceed 5 lbs. and the faucet stays open for at least 10 seconds.</p> <p>Relocate the toilet paper dispenser so it is a minimum of 7" and a maximum of 9" in front of the water closet measured to the centerline of the dispenser.</p>	3  3  3  3	2  2,3  2  3  3  2	I  I,N  I  N  I  I	<p>\$0</p> <p>\$0 to \$350</p> <p>\$100</p> <p>Up to \$750</p> <p>\$0</p> <p>\$0</p>

Total Up to \$32,175

## Town Annex Accessibility Assessment Photos



Photo Town Annex 1



Photo Town Annex 2



Photo Town Annex 3

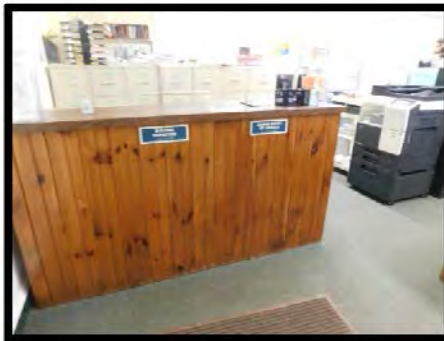


Photo Town Annex 4



Photo Town Annex 5



Photo Town Annex 6



Photo Town Annex 7



Photo Town Annex 8



## **POLICE STATION**

**Description of Facility and Programs:** The Northbridge Police Station, which was constructed in 1988, houses Police and Dispatch services for the town of Northbridge. The building is a single story masonry structure. The main level houses dispatch, meeting space, offices, apparatus bays, lockers, a workout room, holding cells, and other spaces – some, but not all, are open to the public.

The Police Department currently employs approximately 36 personnel including 1 Chief, 1 Detective/Sergeant, 1 Administrative Assistant, 4 Sergeants, 13 Patrol Officers, 2 Reserve Patrol Officers, 3 Special Patrol Officers, and 11 Dispatch personnel.



**Responsible Party:** Board of Selectmen.

**General Description or Obstacle Which Limits Mobility or Access:** The Police Station is moderately accessible compliant with a number of areas of non-compliance.

### **Exterior**

There is no signage at the Piedmont Street entrance and parking to direct patrons to the accessible entrance and parking. (*Note: According to police personnel, the Piedmont Street entrance is not used. There is regular and designated accessible parking at this entrance. In addition to the directional signage, it is recommended that the signage be removed and the striping painted over*). The designated accessible parking for the main entrance is on Piedmont Street and parallel to the street. The designated space lacks striping, lacks an access aisle, and the signage is too low. The accessible route of travel from the parking to the front entrance was partially covered in snow and ice, but appeared to have a running slope of 5.0% or less.

### Interior

Exterior and interior doors with closers have excessive opening forces and close too fast. A number of interior doors lack tactile designation signage. Some doors have glass panes that exceed the maximum height allowed under the 2010 ADA Standards. A lobby airphone buzzer and the dispatch desk “pass-through” window are not within reach range. The lobby drinking fountain is “low” only. A hallway display case serves as a protruding object.

The civilian dispatch area is not on an accessible route of travel as the only means to enter is via stairs. In addition, the stairs lack railings. The staff kitchenette for both police officers and civilian personnel has a sink/counter that is 2” too high, lacks knee clearance, has insufficient clear width in front of the sink, has dispensers that are too high, and a stove with controls on the back and not the front.

### Lobby Bathroom

The bathroom lacks audible and visual alarms, has sink piping that is not wrapped, has dispensers and a mirror that are too high, has a toilet paper dispenser that is improperly located over the grab bars, and has a flush control that is located on the wrong side.

### Squad Room Bathrooms

The bathrooms (men’s and women’s) lack compliant signage, lack audible and visual alarms, have sink piping that is not wrapped, have dispensers and a mirror that are too high, and have toilet paper dispensers that are improperly located. The men’s bathroom side and rear grab bars are both too low.

### Men’s and Women’s Locker Bathrooms

Although the lockers and bathrooms are closed to the public (see further below), civilian dispatch personnel also use the bathrooms, and therefore need to be accessible if the use of the Lobby Bathroom or Squad Room Bathroom is not an option. The bathrooms (men’s and women’s) have sinks that are too high and lack knee clearance; have dispensers, coat hooks, and mirrors that are too high; stall doors that open in, do not fully self-close, and lack pull devices; toilet paper dispensers that are too close to the front of the water closet; and water closets that are too low, lack compliant side and front clearances, and lack grab bars.

### Police Lockers, Showers, and Related Areas for Police Use Only

These areas are limited to police personnel, who must meet strict physical requirements to perform the essential functions of their jobs. The men’s and women’s showers lack any accessible features and have a 4½” abrupt change in level surface to enter. The fitness room is not on an accessible route of travel due to a 4” elevation change and an adjacent phone is not within reach range. The dark room has a sink that is too high, lacks knee clearance, and has faucets that require pinching and twisting of the wrist. As no public access is allowed to these areas, no further action or modifications are required. Modifications would only be necessary if these areas were made open to the public or as an employee reasonable accommodation request.

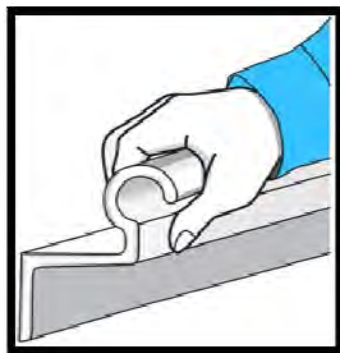
### Holding Cells

There are 4 male and 1 female/juvenile cell, none of which are “accessible”. The water closets have rim heights that are 2” too short and which are 22” too far from the near wall, have water dispenser controls that require 7 lbs or more of operating force (maximum allowed is 5 lbs.) and only stay open for 3 to 4 seconds (minimum 10 seconds required), and have flush controls that require up to 20 lbs. of operating force.

### Commentary on Holding Cells:

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

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



### **Police Station Accessibility Assessment**

General Description of Obstacle	2010 ADAAG	MAAB 521 CMR	Type of Action to be Taken	P	F	TF	Cost Estimate
<b>Directional Signage</b> Outside directional signage at the Piedmont Street entrance/egress directing patrons to the accessible entrance is not provided.	216	41.1.3	Provide directional signage noting the location of the accessible main entrance.	1	2	I	\$100



<b>Parking</b> There is no on-site designated accessible parking space inclusive of access aisle and signage. The only accessible parking is a parallel designated space on Ashmont Street that lacks an access aisle, has signage that is 36" too low, and is not van accessible.  See Photo Police 1.	502 703.7.2	23	Stripe and designate a van accessible parking space with van accessible signage at a width of 11' with a 5' access aisle (8' x 8' also allowed) in the on-site parking closest to the main entrance. Running and cross slopes must not exceed 2.0%. Signage must be set such that the signage not should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located no more than 10' in front of the spaces.	1	2	I	\$200
<b>Reach Range</b> The air phone buzzer in the lobby at the Dispatch Counter is 3" too high under the 2010 ADA Standards.  The Dispatch Counter "pass-through" window is 2" too high under the ADA Standards.  See Photo Police 2.	308.2 308.3	6.5 6.6	Lower the air phone so that it is no more than 48" a.f.f.  Due to the excessive cost, seek a variance to retain the "pass-through" window as is.	1  1	2  1	I  I	\$0  \$0
<b>Drinking Fountain</b> The drinking fountain is non-compliant as it is a "low" only fountain.  See Photo Police 3.	602 305 306	36	Option #1: Discontinue use of the drinking fountain.  Option #2 – Remove the existing drinking fountain and replace with a "hi-low" drinking fountain or add an adjacent "high" fountain. The drinking fountain(s) must comply as follows:  Protruding objects compliance of no > 4" protrusion between 27" and 80" a.f.f. (307); 30"x48" clear space requirement (305), and knee/toe clearance (306). Knee clearance is 9" to 27" a.f.f.; 25" deep max. at 9" a.f.f. or 11" deep min at 9" a.f.f. and 8" deep min at 27" a.f.f. Width of knee clearance s/b 30" wide min (306.3). Toe clearance as part of c.f.s. 17" min – 25" max, 9" high a.f.f., 30" wide (306.2). The spout s/b 15" min from wall and 5" max from the front edge of the unit (602.5). Flow of water 4" high min and spout located max 5" from front (602.6). The spout height s/b 36" max. a.f.f. for "low" and 38" min a.f.f. to 43" max a.f.f. for "high". The controls s/b operable w/one fist; no > 5 lbs force (309.4).	4	3	L	\$1,500 to \$3,500
<b>Exterior and Interior Doors</b> Exterior and interior doors with closers (including bathrooms) do not fully comply with the maximum allowed operating force for an exterior door (15 lbs.) and interior door (5 lbs.) and the minimum closing speed requirement of 6 seconds under 521 CMR. Operating forces vary up to 17 lbs. and closing speeds are as quick as 3 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, 3	2	I	\$0
<b>Door Signage</b> Tactile designation signage is not provided at the following locations: <ul style="list-style-type: none"> <li>Lobby to Station (2)</li> <li>Admin Assistant (2)</li> <li>Chief of Police</li> <li>Lobby Exit Doors by Dispatch (2)</li> <li>Interview Room</li> <li>Lieutenant's</li> <li>Physical Fitness</li> </ul>	703	41	Install tactile designation signage on the latch side of each door with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included.  Signage s/b 60" a.f.f. to the centerline of the sign (521 CMR). Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	2	2	I	\$4,625

<ul style="list-style-type: none"> <li>• Mechanical Room in Fitness</li> <li>• Men's Locker from Fitness</li> <li>• Men's Locker near Kitchen Area</li> <li>• Sergeant's near Kitchen Area</li> <li>• Sergeant's from Hallway</li> <li>• Women's Lockers</li> <li>• Record Storage</li> <li>• Janitor</li> <li>• Dark Room</li> <li>• Squad Room from Dark Room</li> <li>• Investigation</li> <li>• Property Storage</li> <li>• Hallway Door to Property Storage</li> <li>• Conference (2)</li> <li>• Safety Supplies</li> <li>• Booking/Detention</li> <li>• Sallyport and Interior (4)</li> <li>• Closet near Holding Cells</li> <li>• Squad Room Closets (2)</li> <li>• Lobby Bathroom</li> <li>• Squad Room Bathrooms (2)</li> </ul> <p>The Squad Room Bathrooms lack the Universal Symbol of Accessibility.</p> <p>See Photo Police 4.</p>			Provide signage that includes the Universal Symbol of Accessibility at the bathrooms that are accessible.				
<p><b>Protruding Objects</b></p> <ul style="list-style-type: none"> <li>• Hallway display case (41½" a.f.f. w/11¼" protrusion)</li> </ul> <p>Protruding objects extend more than 4" into the accessible route of travel between a height of 27" and 80" a.f.f. or have vertical headroom clearance reduced to less than 80".</p>	307.2	20.6.1	Place a fixed object under or erect small wing walls on both sides of the display case for cane detection.	2	2	I	\$0 to \$50
<p><b>Doors with Glass Panes</b></p> <p>The following doors have glass panes that exceed the maximum viewing height of 43":</p> <ul style="list-style-type: none"> <li>• Lobby to Station (2)</li> <li>• Admin Assistant (1)</li> <li>• Chief of Police</li> <li>• Lobby Exit Doors near Dispatch (2)</li> <li>• Interview Room</li> <li>• Sergeant's near Kitchen Area</li> <li>• Booking/Detention</li> <li>• Sallyport</li> </ul> <p><i>Note: A tolerance of 1" is allowable up to a maximum height of 44" a.f.f.</i></p> <p>See Photo Police 5.</p>	404.2.11	NA	Doors, gates, and side lights adjacent to doors or gates, containing panels that permit viewing through the panels shall have the bottom of at least one panel located 43 inches maximum a.f.f.	4	2	N	\$0
<p><b>Employee Kitchen</b></p> <p>The sink/counter is 36" a.f.f. which is 2" too high and does not provide knee/toe</p>	804.3.2 306.3	32.2 32.6	Modify the counter and sink so that the counter/sink is no more than 34" a.f.f. and there is a minimum of 27"	4	3	L	Up to \$2,500

clearance.		32.7	knee clearance at the sink with guarded, wrapped, or insulated piping.				
The towel and soap dispensers are 50" to 51" a.f.f which are 2" to 3" outside the reach range under the 2010 ADA Standards.	308.2 308.3	6.5 6.6	Lower the dispensers to a height of no more than 48" a.f.f.	4	2	N	\$0
The stove has controls on the back and not on the front of the stove.  See Photo Police 6.	804.6.5	32.8	As necessary through a reasonable accommodation or when the unit needs replacing, provide a stove with the controls on the front panel.	4	1,2	L	Up to \$750+
<b>Dispatch</b> There is no accessible route of travel to the civilian dispatch area as the only means of access is via stairs.  The stairs lack railings.  See Photo Police 7.	403 303	22	An accessible route (ramp, lift) must be provided to the dispatch area.  Install continuous stair railings on both sides of the stairs. Railings s/b between 34" – 38" a.f.f. to the top of the railing, circular or oval in x-section, 1½" – 2" in outside diameter, and with extensions at the top (12" parallel to the ground) and bottom as feasible (slope distance one tread then 12" parallel to the floor).	2  2	3,4  3	L  N	TBD  Up to \$500
<b>Accessible Cell</b> The water closet at 40" o.c., is 22" too far from the near wall, is 2" too low, and the sink lacks knee clearance.	604.2 604.4 306.3	30.7.2 30.7.3 30.9.3	Option #1: Due to the cost of modification and limited use, seek a variance from the 18" o.c. to the nearest wall requirement, and 17" to 19" water closet rim height, and knee clearance requirement. As part of the variance request, have procedures and arrangements in place to transport a disabled detainee to a neighboring community accessible detention facility.	3	1	I	\$0
			Option #2: Initiate the required modifications such that one inmate cell has a water closet/sink that is compliant with Sections 603 – 610 of the 2010 ADA Standards and Sections 15 and 30 of 521 CMR.	3	3	L	TBD
The sink and water closet operating "push buttons" require 7lbs to 20 lbs. of operating force and the water stays on for only 3 to 4 seconds.  See Photo Police 8.	309 606.4	30.9.6 39.5	Adjust the operating mechanisms so that they require no more than 5 lbs. to use and so that the water stays on for at least 10 seconds.	3	2	I	\$0
<b>Lobby Bathroom</b> The bathroom lacks audible and visual alarms.	702	40	Install audible and visual alarms in compliance with NFPA 72.	3	3	N	Up to \$500+
The sink piping is not fully wrapped.	606.5	30.9.5	Fully wrap, guard, or insulate the piping.	3	2	I	\$75
The soap dispenser is 4½" too high and the towel dispensers (2) are 7" to 16" too high.	308.2 308.3	30.12	Lower the soap dispenser and one towel dispenser to a height of no more than 42" a.f.f.	3	2	I	\$0
The mirror is 3½" too high.	603.3	30.11	Lower the mirror so it is no more than 40" a.f.f. to the bottom of the reflecting surface.	3	2	I	\$0
The toilet paper dispenser is located over the grab bars.	604.7	30.7.6 30.8.5	Relocate the dispensers so they are not located over the grab bars. They must also be at least 24" o.c. and 7" minimum to 9" maximum in front of the water closet measured to the centerline of the dispenser.	3	2	I	\$0
The water closet flush control is on the near wall side and not the approach or wide side.	604.6	30.7.5	Option#1: Replace the water closet in entirety with one that has the flush control on the open side.	3	3	N	\$125 to \$350

See Photo Police 9.			Option#2: Replace the water closet tank with one that has the flush control on the open side.				
<b><u>Squad Room Bathrooms</u></b> <b><u>Men's and Women's</u></b> The signage does not include the Universal Symbol of Accessibility.	703.4	41	Install signage with the Universal Symbol of Accessibility.	3	2	I	\$50
The bathrooms lack audible and visual alarms.	702	40	Install audible and visual alarms in compliance with NFPA 72.	3	3	N	Up to \$1,000+
The sink piping is not fully wrapped.	606.5	30.9.5	Fully wrap, guard, or insulate the piping.	3	2	I	\$150
The soap dispensers are 7" to 15" too high and the towel dispensers (2) are 7" to 18" too high.	308.2 308.3	30.12	Lower the soap dispensers and one towel dispenser in each bathroom to a height of no more than 42" a.f.f.	3	2	I	\$0
The mirrors are 2¼" to 2½" too high.	603.3	30.11	Lower the mirrors so they are no more than 40" a.f.f. to the bottom of the reflecting surface.	3	2	I	\$0
The toilet paper dispensers are located over the grab bars and are too close to the front of the water closet.	604.7	30.7.6 30.8.5	Relocate the dispensers so they are not located over the grab bars. They must also be at least 24" o.c. and 7" minimum to 9" maximum in front of the water closet measured to the centerline of the dispenser.	3	2	I	\$0
<b><u>Women's Only</u></b> The water closet flush control is on the near wall side and not the approach or wide side.	604.6	30.7.5	Option#1: Replace the water closet in entirety with one that has the flush control on the open side.  Option#2: Replace the water closet tank with one that has the flush control on the open side.	3	3	N	\$125 to \$350
<b><u>Men's Only</u></b> The rear grab is 2" too low and the side grab bar 2¾" too low.	609.4	30.8.2	Raise the grab bars so they are 33" to 36" a.f.f. to the top of the gripping surface.				\$0
See Photo Police 10.							
<b><u>Police (Men's and Women's) Locker Room Bathrooms</u></b> These areas are normally limited to police personnel, who must meet strict physical requirements to perform the essential functions of their jobs and therefore would not require modifications unless as a result of a reasonable accommodation request. However, as the bathrooms are used by civilian dispatch, whose positions do not require them to meet strict physical requirements to perform the essential functions of their jobs, the bathrooms may need to be made fully accessible.  The police locker room bathrooms are wholly non-compliant as the sinks are too high and lack knee clearance; dispensers and coat hooks are too high; the water closet rims are too low and there is insufficient clear width on the sides and front of the water closets; and there are no grab bars, among other areas of non-compliance.	604 308 609 606 306 309 603	30	As the dispatch positions are not performed by uniformed police officers and the positions can be performed by persons with mobility limiting disabilities, access to an accessible compliant bathroom is required.  Option #1: Have dispatcher personnel use the accessible bathroom in the lobby.  Option #2: Have dispatch personnel use one of the bathrooms in the Squad Room.  Option #3: Modify the Police Bathrooms (Men's and Women's) such they are fully accessible compliant.	3	3,4	L	TBD
See Photo Police 11 and 12.							

Up to \$14,700+

## Police Station Accessibility Assessment Photos



Photo Police 1

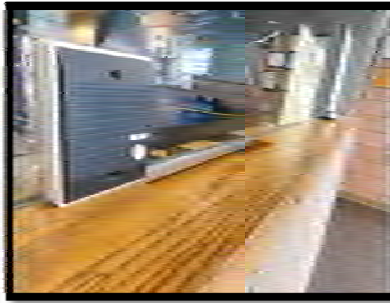


Photo Police 2

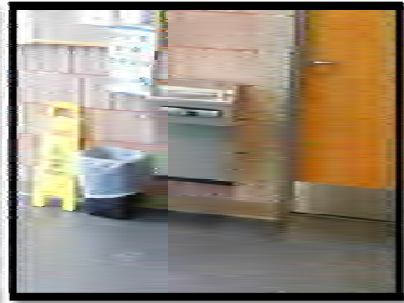


Photo Police 3

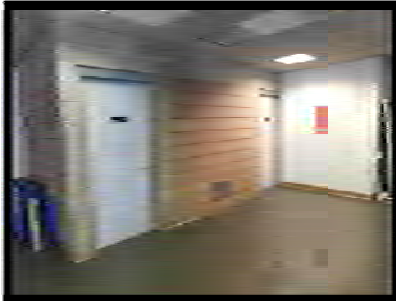


Photo Police 4

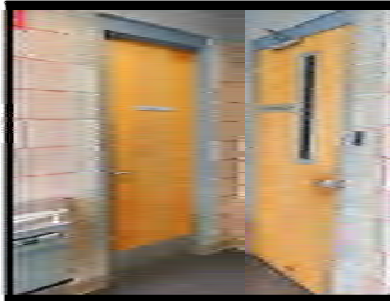


Photo Police 5

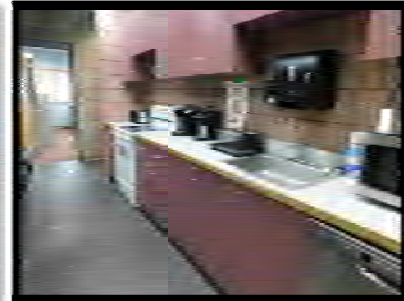


Photo Police 6

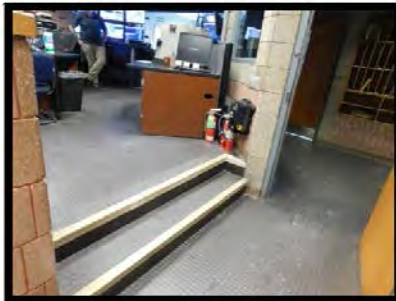


Photo Police 7



Photo Police 8



Photo Police 9

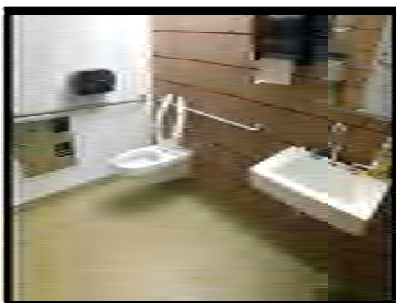


Photo Police 10

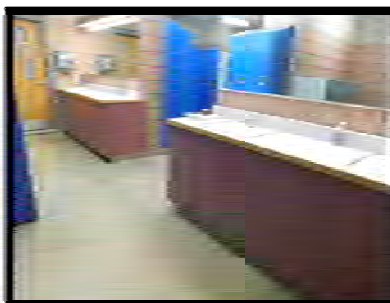


Photo Police 11

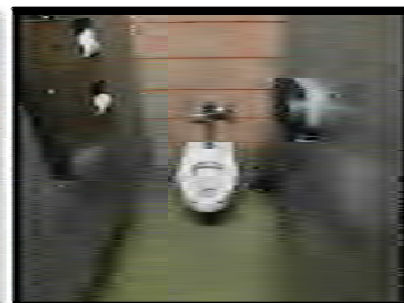


Photo Police 12



## **NORTHBRIDGE MAIN FIRE STATION**

**Description of Facility and Programs:** The Northbridge Department is a full service fire department with a fire chief, a deputy chief, 2 district chiefs, firefighter paramedics and EMT's, an administrative assistant, and part-time on call firefighters. Fire department personnel totals roughly 35 persons. The Northbridge Fire Department provides fire suppression, emergency medical services, and fire related educational services for the community.

The Main Fire Station is housed in a former multi-level masonry factory building. The Lower or Basement Level has an on-grade apparatus bay entrance and houses vehicles and equipment. The main entrance and apparatus bays are located on Main Street. The main level (Level 1) also houses an office area with a bathroom and a dining/kitchen area. Level 2 houses the firefighter bunk rooms and a bathrooms and showers. Level 3 houses the Chief's Office and the Firefighter Meeting Room. Level 4 is solely used for miscellaneous storage.



**Responsible Party:** Board of Selectmen.

**General Description or Obstacle Which Limits Mobility or Access:** The Fire Station is substantially non-compliant even for those areas that are open to the public.

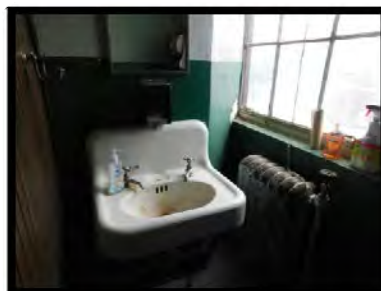
### Exterior

There are no designated accessible parking spaces. There is a roughly 7" abrupt change in level surface at the main entrance door into the station. A drop box and buzzer at the door are not within reach range. The entrance door has an excessive operating force and too fast closing speed.

### Interior General

Doors lack tactile designation signage, have knob-style hardware, and those with glass panes exceed the maximum height allowed of 43" a.f.f. A number of light switches exceed the maximum reach range of 48" a.f.f. Doorway clear widths to the Level 1 offices, bathroom, and kitchen; Level 2 bathroom; and Level 3 bathroom and Administrative areas (Chief, Admin, Bathroom) vary from 24" to 30", which does not meet the minimum required 32" clear width. The building stairs typically have railings on one side only, are up to 4" too low, and lack top and bottom extensions (where feasible). There is no compliant vertical access between levels with the only means being stairs and a freight elevator dating back to use of the building as a mill.

The Basement Level, Level 2, Level 3, and Level 4 are closed to the public. The only area on Level 1 that is open to the public is access to the Office and Counter area. All firefighters who use these areas of the Main Station must meet strict physical requirements to perform the essential functions of their job. Currently the civilian position of Administrative Assistant is also located on the 3<sup>rd</sup> Level as is the Chief's Office. None of the bathrooms on any of the Levels are compliant with most dating back to use of the building as a mill. Bathrooms lack sufficient maneuverability; water closets lack grab bars and are too low; sinks lack knee clearance, have piping that is not insulated or wrapped, and have faucets that require pinching or twisting of the wrist; and dispensers are not within reach range. In addition, the Firefighter Kitchen/Day Room area on Level 1 has a sink that is too high, lacks knee clearance, and has dispensers and a light switch that are too high. The dining table also lacks knee clearance. (See Photos Below). The areas that are off limits to the general public are limited to firefighter personnel who must meet strict physical requirements to perform the essential functions of their job. Unless there is a change in policy in facility use or conditions of employment, no further action is required in these areas unless necessitated through a reasonable accommodation request. Reasonable accommodations may be required for the provision of access and services relating to the Administrative Assistant and Fire Chief and is discussed further below.



### Accessibility Compliance Options

The Town of Northbridge has approved funding for the construction of a new fire station with an anticipated completion date of 2023-2024. Based on this, the following options are provided for current building compliance:

Immediate Term Option #1: Adopt a reasonable accommodation policy for visitors and civilian personnel. This would include meeting with visitors on the first floor level at a designated accessible location and providing access through a bay door and a designated accessible route of travel. Civilian personnel reasonable accommodation requests would be addressed on a case by case basis but could include creating work/office space on the 1<sup>st</sup> Level and 1<sup>st</sup> floor bathroom modifications.

Intermediate Option #2: Should the construction of the new fire station be substantially delayed or postponed, then at least one designated accessible parking space with signage will need to be created; the exterior drop box and airphone buzzer will need to be lowered to within reach range, the entrance door will need to be on an accessible route of travel, and the Level 1 office counter will need to be lowered. If required through a reasonable accommodation request, the Level 1 office door will need to be widened, and the Level 1 bathroom made accessible compliant. .

Long Term Option #3: Should the construction of the new fire station be cancelled, and the Department desires to keep administrative offices and space on Level 3, along with other services, architectural and engineering services would be required to address full building compliance. Design and construction costs for such a transition would be in the millions of dollars.

The detailed accessibility assessment below will be based on the Immediate Option #2.

### **Main Fire Station Accessibility Assessment**

<b>General Description of Obstacle</b>	<b><u>2010 ADAAG</u></b>	<b><u>MAAB 521 CMR</u></b>	<b><u>Type of Action to be Taken</u></b>	<b><u>P</u></b>	<b><u>F</u></b>	<b><u>TF</u></b>	<b><u>Cost Estimate</u></b>
<b><u>Parking</u></b> There is no designated accessible parking for the building.	502 703.7	23	Construct an accessible parking space as follows: 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 in front of the space; slopes should not exceed 2% in any direction.	1	3	N	Up to \$150
<b><u>Building Access</u></b> A roughly 7" height differential occurs at the main entrance door from the parking lot into the station.  See Photo Fire 1.	404.2.5	26.10	Modify the threshold and/or entrance so that there is up to a ½" beveled threshold with no greater than a 1:2 slope.	1	3	N	Up to \$3,500+
<b><u>Exterior and Interior Doors</u></b> The exterior door does not fully comply with the maximum allowed operating force for an exterior door (15 lbs.) and the minimum closing speed requirement of 6 seconds under 521 CMR. The operating force is 18 lbs. and the door closes in 4 seconds.	404.2.8 404.2.9	26.8 26.9	Adjust the door closer such that the push/pull force does not exceed 15 lbs with the door closing speed being at least 6 seconds.	1	2	N	\$0



<b>Reach Range</b> The air phone buzzer (52" a.f.f.) and the drop box (50" a.f.f.) are 2" to 4" above reach range.  See Photo Fire 1.	308.2 308.3	6.5 6.6	Lower the air phone and drop box so they are no more than 48" a.f.f.	2	2,3	N	\$0 to \$150
<b>Level 1 Office Counter</b> The counter is 42¼" a.f.f., which is 6¼" too high, is not 36" long, and does not provide adequate knee width clearance due to the support braces.  See Photo Fire 2.	904.4	7.2	Replace the existing counter with one that is 36" long by no more than 36" high with a minimum of 27" of knee height and 30" knee width clearance.	2	3	N	Up to \$350

Up to \$4,150+

### **Fire Station Accessibility Assessment Photos**



Photo Fire 1



Photo Fire 2

## **NORTHBRIDGE FIRE STATION #2**

**Description of Facility and Programs:** Northbridge Fire Station #2 is located at 2305 Providence Road in the Rockdale section of Northbridge. The station has 3 bays for apparatus and a small office on the main or first level. The basement level is a wide open area with a small kitchenette and 2 bathrooms. The basement can be accessed via internal stairs as well as a ground level egress door. According to fire personnel, the station is in the river floodplain and receives water when then the adjacent river crests and reaches flood level. Station 2 is not staffed and is fully closed to the public.



**Responsible Party:** Board of Selectmen.

### **General Description or Obstacle Which Limits Mobility or Access:**

#### **Exterior Conditions**

There is no designated accessible parking. There is a 4" abrupt change at the entrance threshold. The entrance door has non-compliant knob style hardware.

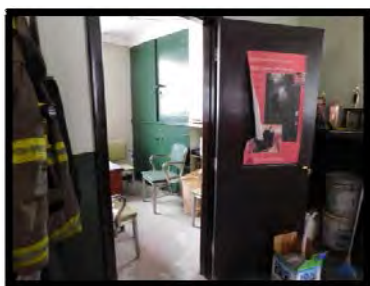


### Interior Conditions

Main Level: The office has knob-style hardware and lacks tactile designation signage. There is only 31" clear width at the office doorway. The stairs to the basement have railings that lack top and bottom extensions (where feasible).

Basement Level: The door to the basement has knob-style hardware, lacks tactile designation signage, requires more than 5 lbs. of operating force to open, and closes in less than 6 seconds. The basement egress door has knob style hardware, lacks tactile designation signage, and is not on an accessible route of travel. A small kitchenette is 2" too high, lacks knee clearance, and has sink faucets that require pinching and twisting of the wrist. In addition the soap and towel dispensers are 4" to 10" too high.

The 2 bathrooms are wholly non-compliant with insufficient doorway clear width, knob-style hardware, and the lack of tactile designation signage. The sinks are 2" too high; have piping that is not wrapped, guarded, or insulated; and water closets that are too low in height and compliant near wall, far wall, and front clearances. In addition, the water closets lack grab bars. Due to the basement flooding and location of the waste lines, pumps in the bathrooms further restrict the maneuverability and clear widths at the water closets.



### Current Use to Remain

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

### Full Building Use

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

## **PUBLIC WORKS – HIGHWAY DIVISION**

**Description of Facility and Programs:** The Northbridge Public Works Highway Division renders services to residents in the areas of highway maintenance and construction, snow and ice operations, shoulder and ditch cleaning, pothole repair, road resurfacing, brush clearing and chipping, tree removal, stormwater management, cemetery maintenance, parks and playgrounds oversight, town-owned buildings, and related road work.

The administrative building consists of a small front office area and 5 apparatus bays. The employee work/apparatus bay area also include a kitchen counter (no sink), lockers (no benches), tables and chairs for eating and breaks, and a bathroom. The employee work/apparatus bay area is not open to the public.

The newer “Butler-style” building serves as an additional area to house equipment with 6 apparatus bays. This building consists solely of storage for highway vehicles and equipment. Bathrooms are located in the far corner of the building. This building is not open to the public.



**Responsible Party:** Board of Selectmen

### **General Description or Obstacle Which Limits Mobility or Access:**

#### **Parking and Administrative Office Area**

The signage for the designated accessible parking space is too low. At the time of assessment, the access aisle was covered in snow. A drop box is not within reach range. Both the main entrance storm and wooden doors have hardware that require use of the thumb. The storm door closes too fast. Interior spaces and doors lack tactile designation signage.

#### **Administrative Office Restricted and Non-Public Areas**

As noted above, the garage area and small employee area within the garage area are not open to the public. Three doors have knob-style hardware and lack tactile designation signage. The employee bathroom entrance has only 27” to 28” of clear width. The bathroom sink is non-compliant and the piping lacks insulation. The urinal, mirror, and dispensers are all too high. The water closet is 1” too high, lacks grab bars, and lacks sufficient clearance on the far side.

As these areas are not intended for public use and are limited solely to highway personnel who must meet strict physical requirements to perform the essential functions of their job, no further action is required at the present time. Further modifications may be required if the current practices and policies change and current non-public interior spaces are open to the general public or as a result of a reasonable accommodation request. This would include the hiring of individuals to work in the office and not required to meet strict physical requirements to perform the essential functions of their job. This may necessitate modifications to the existing bathroom, creating a new accessible bathroom, or creating office space in the metal frame building and undertaking the required accessibility modifications in that building as detailed below.

#### Metal Frame Equipment and Vehicle Building

The accessible route to the side entrance door has an 8.6% to 10.6% running slope, which exceeds that allowed. The door has an excessive operation force, closes too fast, does not fully extend to a 90 degree position, and has a glass pane that is 3" too high.

There is no clearly designated accessible route on the interior. The women's bathroom signage is 2" too high, whereas the men's bathroom lacks signage. Both bathrooms have doors with excessive operating forces and too fast closing speeds; soap dispensers that are too high; sink shut-off valves that are not fully wrapped; water closets that are too far from the near wall; and toilet paper dispensers that are too close to the front of the toilet.

As these areas are not intended for public use and are limited solely to highway personnel who must meet strict physical requirements to perform the essential functions of their job, no further action is required at the present time. Further modifications may be required if the current practices and policies change and current non-public interior spaces are open to the general public or as a result of a reasonable accommodation request. This would include reconstructing the entrance approach so that the running slope is under 5.0% or at 5.0% to 8.3% with paired railings; modifying the door so the operating force does not exceed 15 lbs., takes at least 6 seconds to close, opens to a full 90 degrees, and the glass pane is frosted or the door modified so the glass pane is no more than 43" a.f.f. The bathroom tactile designation signage should be located on the latch side of the door at a height of no more than 60" o.c.; door operating forces should not exceed 5 lbs. and the doors should take at least 6 seconds to close; all sink piping should be fully wrapped; soap dispensers should be no more than 42" a.f.f.; toilet paper dispensers should be located between 7" to 9" in front of the water closets; and the water closets should be located 18" o.c. from the near wall.

## Public Works – Highway Division 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>
<b><u>Parking</u></b> The designated accessible signage is 10" too low. Snow was piled in the access aisle.  See Photo Highway 1.	502 703.7.2	23	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.  Both the parking space and access aisle must be free of snow and debris at all times to allow for proper use.	1	2	I	\$0
<b><u>Drop Box</u></b> The drop box is 56" a.f.f., which is 8" too high  See Photo Highway 2.			Lower the drop box so the lid is no more than 48" a.f.f.	1	2	I	\$0
<b><u>Door Operating Force and Closing Speed</u></b> The exterior storm entrance does not comply with the minimum closing speed requirement of 6 seconds.	404.2.8	26.9	Adjust the door closers such that the closing speed is at least 6 seconds.	1	2	N	\$0
<b><u>Door Hardware</u></b> The main entrance storm door and the wooden door have hardware that requires pinching and use of the thumb.  See Photo Highway 3.	404.2	26.11	Replace the existing hardware with ones that can be operable with a closed fist or loose grip.	1	2	N	\$300
<b><u>Door Signage</u></b> Tactile designation signage is not provided at the door to the non-public apparatus bay/garage area.  See Photo Highway 4.	703	41.1	Install accessible compliant signage on the latch side of the door with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Under 521 CMR, signage s/b 60" a.f.f to the centerline of the sign. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).  The tactile signage for the highway garage/bay area should also note that public access is not allowed.	4	2	I	\$125+

Total up to \$425+



**Public Works – Highway Division Accessibility Assessment Photos**



Photo Highway 1



Photo Highway 2

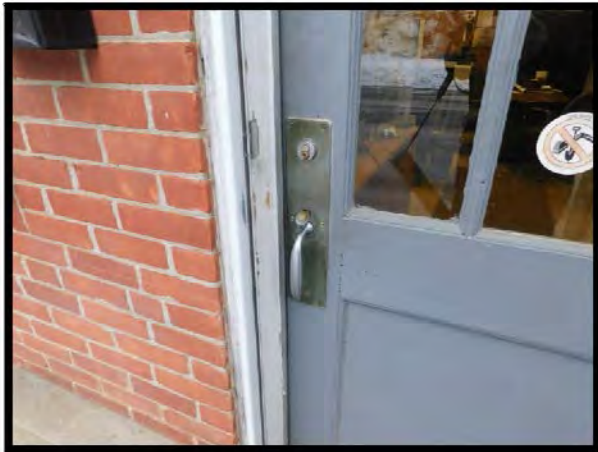


Photo Highway 3



Photo Highway 4

## **PUBLIC WORKS – SEWER DIVISION**

**Description of Facility and Programs:** The Northbridge Public Works Sewer Division renders services to residents in the areas of public sewer collection, public sewer treatment, and maintenance and operation of pumping stations.

The Control – Administration Building serves as the administrative office and also includes a laboratory, storage, offices, lunch room, lockers, and a bathroom.

The Advanced Treatment Process Building consists of an office, meeting room, various mechanical and control rooms, and men's and women's bathrooms.



**Responsible Party:** Board of Selectmen

### **General Description or Obstacle Which Limits Mobility or Access:**

#### **Control – Administration Building**

The Control – Administration Building lacks an accessible route of travel into the building. There is 6" granite curbing to the building walkway. The walkway running slopes vary from 5.4% to 10.2%. The stairs have railings which are not round or oval in shape and lack bottom extensions. The front entrance door has an excessive operating force and closes too fast. Interior doors have knob hardware and lack tactile designation signage. A drinking fountain is "high" only and lacks knee clearance. A wall mounted first aid kit serves as a protruding object and is not within reach range. There is a 6 ½" abrupt change in level surface into the GIS Mapping Center and Lunch Room. A kitchenette outside the lockers has a sink/stove counter that is too high, lacks knee width and clearance, has faucets that require pinching and twisting of the wrist, and a coat hook that is too high. The locker room/bathrooms have a non-accessible shower. The bathroom sink lacks knee clearance; sink piping is not wrapped or insulated; the dispensers and mirror are too high; the urinal is too high; the water closet and stall is wholly non-compliant due to the height of the water closet, insufficient clear widths, the lack of grab bars, and a coat hook and toilet paper dispenser that are not within reach range; and the locker benches do not meet width or clearance requirements.



The stairs to the lower level have a railing on one side only that is not round or oval in shape. As this is closed to the public and for employees only, no further action is required unless as a result of a reasonable accommodation request.

#### Advanced Treatment Process Building

The Advanced Treatment Process Building designated accessible parking space and signage is compliant with the exception of the space and access aisle not being fully plowed (snow). *Note: It is important that designated accessible parking spaces, access aisles, and accessible route of travel be maintained and kept from snow and debris at all times.* There is no level landing at the curb ramp from the parking and building walkway. There are also excessive abrupt changes in level surface at the front entrance transition from asphalt to concrete. Exterior and interior doors with closers have excessive operating forces and too fast closing speeds. Interior doors lack signage. A hallway phone and a hallway “ear plug” holder serve as protruding objects. A drinking fountain is “high” only. The meeting room has a coat rack and micro wave that are not within reach range and a kitchenette sink that is too high and lacks knee clearance. The bathrooms (men’s and women’s) have non-compliant locker benches; soap and towel dispensers that are too high; and water closet stalls that lack interior pull devices, have too high coat hooks, toilet paper dispensers that are improperly located, and grab bars that are too far from the interior corner and that are too high. Showers in both bathrooms do have accessible features.

#### Restricted and Non-Public Areas

The Control – Administration Building is not accessible but there are offices and functions within the building which would appear that could be used and occupied by personnel who do not need to meet strict physical requirements to perform the essential functions of their job. In addition, there is no public access to the building. As a result, most of the building would be required to be accessible either by right or via a reasonable accommodation request. The exception to this requirement would be the showers and lockers which are for employees only and who must meet strict physical requirements to perform the essential functions of their job. As a result, no further action to the lockers, showers, and benches are required unless as required as a result of a reasonable accommodation request. The Sewer Division should develop a reasonable accommodations plan to address potential needs of its employees.

The Advanced Treatment Process Building is reasonably accessible and does have areas that are off-limits to the public. As this building is used for meetings, items such as accessible bathrooms, compliant hardware, tactile designation signage, protruding objects, and other related items would need to be addressed.

## Public Works – Sewer Division 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>
<b>Control – Administration Building</b>							
<b><u>Route of Travel into the Building</u></b> There is no accessible route of travel into the building as there is 6" high curbing from the parking area to the sidewalk. The lower concrete segment of the sidewalk has a running slope of up to 10.2%, followed by a roughly 6" abrupt change in level surface, then another concrete segment with running slopes of 5.4% to 6.2%. The stairs have railings that are not round or oval in shape and lack bottom extensions.  See Photo Sewer 1.	403 505	22 27	Architectural/engineering services are required to determine the best way to achieve compliant access into the building from the parking lot to address both the accessible route of travel and stairs.  There can be no greater than ¼" unbeveled changes in level surface along an accessible route of travel. Running slopes cannot exceed 5.0% for a walkway and no more than 8.3% for a ramp with paired railings. Ramp railings must be in compliance per S. 505 of the 2010 ADA Standards and Section 24 of 521 CMR. Stairs and stair railings must adhere to Sections 504 and 505 of the 2010 ADA Standards and Section 27 of 521 CMR.	1	4	L	TBD
<b><u>Exterior and Interior Doors</u></b> The exterior and interior doors with closers (including bathrooms) do not fully comply with the maximum allowed operating force for an exterior door (15 lbs.) and interior door (5 lbs.) and the minimum closing speed requirement of 6 seconds under 521 CMR.	404.2.8 404.2.9	26.8 26.9	Adjust door closers such that the push/pull force does not exceed 15 lbs for an exterior door and 5 lbs. for an interior door with door closing speeds of at least 6 seconds.	1, 3	2	I	\$0
<b><u>Door Signage</u></b> Interior doors lack tactile designation signage (office, lab, locker room, office/lunchroom door, 5 doors in office/lunchroom area).  See Photo Sewer 2.	703.4	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	N	\$1,125
<b><u>Door Hardware</u></b> Interior doors have non-compliant knob style hardware (office, lab, locker room, office/lunchroom door, 5 doors in office/lunchroom area).  See Photo Sewer 3.	404.2	26.11	Install lever-style or similar accessible compliant hardware on the 9 interior doors.  <i>Note: Depending on the door and type/quality of hardware, lever hardware may vary from \$75 to \$275 per unit. The estimate provided is at the mid-range for these doors.</i>	2	2	N	\$1,125
<b><u>Drinking Fountain</u></b> The drinking fountain is "high" only and lacks knee clearance providing only a parallel approach.  See Photo Sewer 4.	602 305 306	36	Option #1: Discontinue use of the drinking fountain.  Option #2 – Remove the existing drinking fountain and replace with a "hi-low" drinking fountain. The drinking fountain must comply as follows:  Protruding objects compliance of no > 4" protrusion between 27" and 80" a.f.f. (307); 30"x48" clear space requirement (305), and knee/toe clearance (306). Knee clearance is 9" to 27" a.f.f.; 25" deep max. at 9" a.f.f. or 11" deep min at 9" a.f.f. and 8" deep min at 27" a.f.f. Width of knee clearance s/b 30" wide min (306.3). Toe	4	3	L	\$0 to \$3,500

			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).				
<b>Wall Mounted First Aid Kit</b> The first aid kit is more than 48" a.f.f. to open, which is beyond the reach range under the 2010 ADA Standards.  The first aid kit protrudes 6" into the accessible route of travel at a height of 45" a.f.f.  Protruding objects extend more than 4" into the accessible route of travel between a height of 27" and 80" a.f.f. or have vertical headroom clearance reduced to less than 80".	308.2 308.3  307.2	6.5 6.6  20.6.1	Lower the first aid kit so that it is no more than 48" a.f.f. to open.  Place a fixed object under the first aid kit for cane detection.	2  2	2  2	I  I	\$0  \$0
<b>Office and Lunch Room</b> There is a 6½" abrupt change in level surface/threshold at the doorways to access the lunchroom and GIS Mapping Office.  Lunchroom dispensers and telephone are greater than 48" a.f.f., which exceeds the reach range under the 2010 ADA Standards.  See Photo Sewer 5.	404.2.5  308.2 308.3	26.10  6.5 6.6	As a result of a reasonable accommodation request, an accessible route of travel to these areas will be required or the office and lunchroom will need to be relocated to an area that is accessible.  Dispensers and the telephone s/b lowered to a height of no more than 48" a.f.f.	2  2	3,4  2,3	  N	TBD  \$0 to \$150
<b>Employee Kitchenette</b> There is inadequate maneuvering clearance in front of the sink/stove/fridge combination kitchenette. The sink/counter is 43" a.f.f. which is 9" too high and does not provide knee/toe clearance and knee width. Sink faucets require pinching and twisting of the wrist.  The coat hooks are 62½" a.f.f., which are 14½" outside the reach range under the 2010 ADA Standards.  See Photo Sewer 6.	305 804.3.2 306.3 309  308.2 308.3	27 32.2 32.6 32.7  6.5 6.6	As use is restricted to employees only, seek a variance. If a reasonable accommodation request requires further action, then further modifications would be necessary. This could include relocation of the existing kitchenette area or provision of one that is accessible compliant. If required, modifications would include providing a counter/sink that is no more than 34" a.f.f. with a minimum of 27" knee clearance and 30" clear width at the sink with guarded, wrapped, or insulated piping.  Provide at least one coat hook at a height of no more than 48" a.f.f.	2  2	1  2	L  L	\$0 - TBD  \$20
<b>Bathroom</b> The sink provides only 25" of knee clearance, which is 2" too low. In addition, the piping lacks insulation.  The soap and towel dispensers are 15" too high.  The mirror is 11½" too high.  The urinal is 24½", which is 7½" too high.	306 606.5  308  603.3  605.2	30.9 30.9.2 30.9.3  30.12  30.11  30.10	Raise the sink so there is 27" of knee clearance. Wrap or insulate the piping.  Lower the dispensers to a height of no more than 42" a.f.f.  Lower the mirror to a height of no more than 40" a.f.f. to the top of the reflecting surface.  Lower the urinal to a height of no more than 17" a.f.f.	3  3  3	3  2  2  3	L  L  L	Up to \$750  \$0  \$0  Up to \$750

<p>The bathroom stall is only 37" wide and as a result does not meet the water closet near and far wall setback requirements. The water closet rim is 1" too low and the flush control is on the wrong side. The water closet lacks grab bars. The toilet paper dispenser is 7" too close to the front of the water closet. The coat hook is 20" too high.</p> <p>See Photos Sewer 7 and 8.</p>	<p>604.8 604.2 604.4 604.5 604.6 609 604.7 308</p>	<p>30.6.1 30.7.2 30.7.3 30.7.5 30.8 30.7.6</p>	<p>Modify the stall so it is 60" wide x 72" deep. The water closet s/b 17" to 19" a.f.f. to the top of the rim; 18" o.c. to the near wall, 42" o.c. to the far wall, and 42" to the front of water closet, with a flush control on the open or wide side. Side and rear grab bars (42" long) must be provided at a height of 33" to 36" a.f.f. to the top of the gripping surface. The toilet paper dispenser must be at a height of 24" o.c. at a distance of 7" to 9" in front of the water closet. The coat hook should not exceed a height of 48" a.f.f.</p>	<p>3</p>	<p>3</p>	<p>L</p>	<p>TBD – up to \$7,500+</p>
<b>Advanced Treatment Process Building</b>							
<p><b>Route of Travel into the Building</b></p> <p>There is no level landing at the curb ramp from the designated accessible parking space to the walkway to the building.</p> <p>There are ¼" to ¾" abrupt changes in level surface at the door entry.</p> <p>See Photo Sewer 9.</p>	<p>406.4</p>	<p>21.6.1</p>	<p>Construct a 36" wide by 48" deep level landing (2.0% slope or less in any direction) at the top of the curb ramp.</p> <p>Modify the walkway and landing in front of the door entry to eliminate the abrupt change in level surface.</p>	<p>1</p> <p>1</p>	<p>3</p> <p>2</p>	<p>I</p> <p>I</p>	<p>\$300</p> <p>\$150</p>
<p><b>Exterior and Interior Doors</b></p> <p>The exterior and interior doors with closers (including bathrooms) do not fully comply with the maximum allowed operating force for an exterior door (15 lbs.) and interior door (5 lbs.) and the minimum closing speed requirement of 6 seconds under 521 CMR.</p>	<p>404.2.8 404.2.9</p>	<p>26.8 26.9</p>	<p>Adjust door closers such that the push/pull force does not exceed 15 lbs for an exterior door and 5 lbs. for an interior door with door closing speeds of at least 6 seconds.</p>	<p>1, 3</p>	<p>2</p>	<p>I</p>	<p>\$0</p>
<p><b>Door Signage</b></p> <p>Interior doors lack tactile designation signage (electrical, janitor, blower room (2), pump/pipe/meter gallery (2), mechanical room, meeting room, control room office).</p> <p>In addition, the men's and women's signage is on the door and is not tactile.</p> <p>See Photos Sewer 10 and 11.</p>	<p>703.4</p>	<p>41.1</p>	<p>Install accessible compliant signage on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Under 521 CMR, signage s/b 60" a.f.f. to the centerline of the sign. Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).</p> <p>The bathroom signage must also include the Universal Symbol of Accessibility.</p>	<p>2</p>	<p>23</p>	<p>I</p>	<p>\$1,375</p>
<p><b>Drinking Fountain</b></p> <p>The drinking fountain is "high" only.</p> <p>See Photo Sewer 12.</p>	<p>602 305 306</p>	<p>36</p>	<p>Option #1: Discontinue use of the drinking fountain.</p> <p>Option #2 – Remove the existing drinking fountain and replace with a "hi-low" drinking fountain. The drinking fountain must comply as follows:</p> <p>Protruding objects compliance of no &gt; 4" protrusion between 27" and 80" a.f.f. (307); 30"x48" clear space requirement (305), and knee/toe clearance (306). Knee clearance is 9" to 27" a.f.f; 25" deep max. at 9" a.f.f. or 11" deep min at 9" a.f.f. and 8" deep min at 27" a.f.f. Width of knee clearance s/b 30" wide min (306.3). Toe clearance as part of c.f.s. 17" min – 25" max, 9" high</p>	<p>4</p>	<p>3</p>	<p>L</p>	<p>\$0 to \$2,500</p>

			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).				
<b>Protruding Objects</b> Protruding objects are items or fixtures that extend more than 4" into the accessible route of travel between a height of 27" and 80" a.f.f. or have vertical headroom clearance reduced to less than 80".  The following are protruding objects: <ul style="list-style-type: none"> <li>Hallway phone (59" a.f.f. with a 5" protrusion)</li> <li>Ear plug holder (51½" a.f.f. with a 10¼" protrusion)</li> </ul> See Photo Sewer Hall 13.	307.2	20.6.1	Place fixed objects under the phone and ear plug holder for cane detection.	2	2	I	\$0
<b>Meeting Room</b> The coat hooks are 59" a.f.f., which are 11" too high. The microwave is 66" a.f.f., which is 18" too high.  The kitchenette is 2" too high and lacks knee clearance.  See Photo Sewer 14.	308.2 308.3  804.3.2 306.3	6.5 6.6  32.2 32.6 32.7	Provide at least one coat hook at a height of no more than 48" a.f.f. Relocate the microwave so that it is no more than 48" a.f.f. or provide a new microwave to be placed on the counter.  Modify the counter and sink so that the counter/sink is no more than 34" a.f.f. and there is a minimum of 27" knee clearance at the sink with guarded, wrapped, or insulated piping.	2  2	2  3	I  L	\$10 to \$260  Up to \$1,250
<b>Bathrooms</b> <b>Men's and Women's</b> The coat hooks are 4" too high, the soap dispensers are 1" to 9¼" too high; and the towel dispensers are 7½" too high.  The stall doors lack interior pull devices.  The women's toilet paper dispenser is located on the rear wall and the men's toilet dispenser is 3" too close to the front of the water closet.  The rear grab bars are 1½" to 2¾" too far from the interior corners.  The side and rear grab bars are ½" to 1¼" too high. <i>Note: There are no tolerances for a range of dimensions.</i>  See Photos Sewer 15 and 16.	308  604.8  604.7  604.5  609.4	30.12 30.6.1  30.6.1  30.7.6  30.8  30.8.2	Lower the coat hooks to a height of no more than 48" a.f.f. and the soap and towel dispensers to a height of no more than 42" a.f.f.  Install interior pull devices on the stall doors.  Relocate the toilet paper dispensers so they are a minimum of 7" and a maximum of 9" in front of the water closet measured to the centerline of the dispenser and at least 24" a.f.f. <i>Note: There also must be a at least 1½" clearance below the grab bar to the nearest object or fixture.</i>  Relocate the rear grab bars so that they are no more than 6" from the interior corner.  Lower the grab bars to a height of 33" to 36" a.f.f. to the top of the gripping surface.	3  3  3  3	2  2  2  2	I  I  I  I	\$0  \$40  \$0  \$0  \$0

Total up to \$20,795+

## Public Works – Sewer Division Accessibility Assessment Photos



Photo Sewer 1



Photo Sewer 2

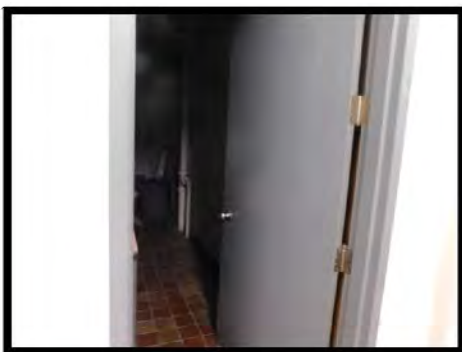


Photo Sewer 3

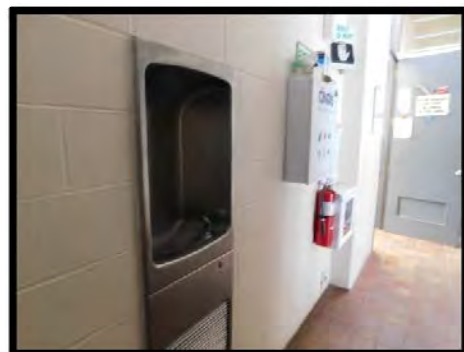


Photo Sewer 4

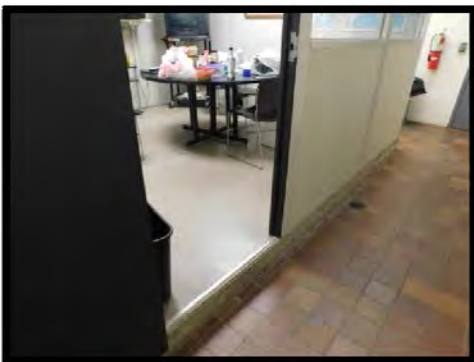


Photo Sewer 5



Photo Sewer 6

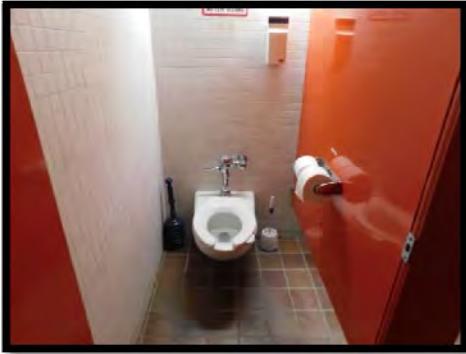


Photo Sewer 7



Photo Sewer 8



Photo Sewer 9



Photo Sewer 10



Photo Sewer 11

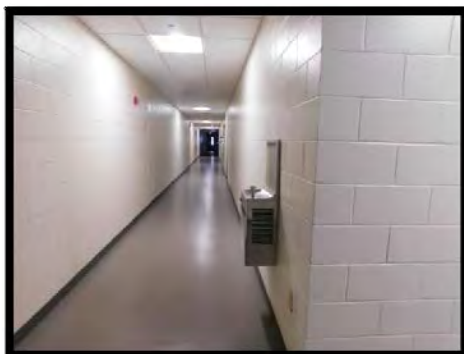


Photo Sewer 12





Photo Sewer 13



Photo Sewer 14



Photo Sewer 15

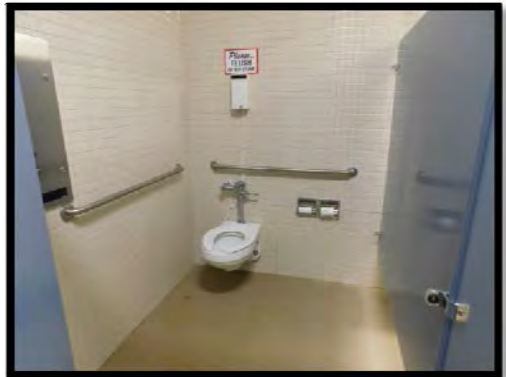


Photo Sewer 16



## **SENIOR CENTER**

**Function and Description of Facility and Programs:** The Northbridge Senior Center coordinates and operates senior-oriented social and educational programs and training and provides many services which include information, referrals and advocacy to many outside resources. The Center is located at 20 Highland Street in a reconverted and renovated older 2-story school building. Level 1 of the building consists of a reception area, administrative offices, a large multi-purpose room, a kitchen (under construction at the time of assessment), and men's and women's bathrooms. Level 2 consists of a billiards room, an exercise/art room, a meeting room, and a unisex bathroom. An elevator serves as the accessible route of travel between the first and second levels. The mostly unfinished basement level houses the food pantry.



**Responsible Party:** Council on Aging/Board of Selectmen

### **General Description or Obstacle Which Limits Mobility or Access:**

#### **Parking, Exterior Accessible Route of Travel, and Exterior Stairs**

The designated accessible parking spaces near the main entrance have excessive cross slopes, have signage that is too low, non-compliant widths and access aisles, and 2 spaces which lack access aisles. The designated accessible parking spaces near the side egress stairs lack access aisles with one space having excessive cross slopes and neither space designated as van accessible.

The side egress stairs have railings that are not round or oval in shape and lack extensions.

Two picnic tables in a courtyard area in front of the building lack knee clear width. In addition, the accessible route of travel to and from the picnic tables to the main entrance have running slopes of 5.4% to 7.8% and lack paired railings.

The ramp to the accessible entrance has running slopes that vary up to 8.6%. The lower railings are 20½" a.f.f. to the top of the gripping surface in some locations. The level landing at the top of the ramp is only 4 feet wide.

The stairs to the main entrance has a railing on only one side and also lacks compliant bottom extensions.

#### General

Interior doors with closers have excessive operating forces and close too fast. Interior doors also lack tactile designation signage and non-compliant hardware. A number of doors have glass panes that are too high. The front office and director's office have inadequate doorway clear widths. The sign-in table scanner is not within reach range. The front table near the reception area restricts the clear width to only 27½". The Level 1 Large Meeting Room and Level 2 Meeting Room have tables that do not provide the minimum required knee height clearance and a telephone that is not within reach range. The Level 2 Billiards Room, Exercise/Arts Room, and the Meeting Room have non-compliant sinks and dispensers that are too high. Level 2 Hallway coat hooks are not within reach range.

#### Kitchen

A kitchen area was under construction at the time of assessment with none of the cabinets, sink, or hardware yet installed. A review of the plans for the kitchen adhered to both 521 CMR and the 2010 ADA Standards for maneuverability, clear widths, sink knee clearance, counter heights, and stove controls.

#### Stairs

The stairs to the 2<sup>nd</sup> Level have railings that are too low, are not continuous, and lack top and bottom extensions.

#### Level 1 Men's and Women's Bathrooms

The bathrooms have a number of areas of non-compliance. Dispensers, mirrors, and coat hooks are too high; stall doors are not self-closing, open in (urinal only), and lack pull devices; toilet paper dispensers are too close to the front of the water closet; water closet minimum required clearances are not met; grab bars are 6" too short; the rear grab bar is too far from the interior corner. In addition, the Men's Bathroom urinal is too high and lacks adequate clear width and the Women's Bathroom water closet flush control is on the wrong side.

#### Level 2 Unisex Accessible Bathroom

The coat hook, soap dispenser, and toilet cover dispenser are too high and the rear grab bar is 6" too short.

#### Food Pantry

The food pantry has non-compliant knob-style hardware. There is no accessible route of travel to the food pantry from either the outside or from the inside of the building as the only means of access is via stairs. The food pantry has interior doors that are non-compliant with knob style and latch style

hardware and which lack tactile designation signage. One door has a glass pane that is 4½” too high. There are 3 sets of stairs in the food pantry – exterior access/egress, interior access/egress, and bathroom access. The stairs have railings on one side only, are not at the proper heights, and lack extensions. The bathroom is wholly non-compliant with a sink that lacks knee clearance, sink piping that is not wrapped, and faucets that require pinching and twisting of the wrist; dispensers are too high; the stall door lacks adequate clear width, is not self-closing, opens in, lacks an exterior door pull, and has a non-compliant locking device. The water closet is 1” too low; has a flush control on the wrong side; lacks compliant near wall, far wall, and front clearances; and lacks grab bars.

Currently, the food pantry is open 2 days per week and 2 hours per day for a total of 4 hours per week. The food pantry is operated by volunteers who must meet certain physical requirements to reach, lift, stock, and carry food items. Patrons of the food pantry are not allowed in the building with food being delivered by volunteers to individuals in their vehicles. If this process remains, then no other action would be required at the present time unless as a result of a reasonable accommodation request. If residents are allowed inside the pantry, then the pantry will need to be made fully accessible or relocated to a facility that is accessible.

### **Senior Center Accessibility Assessment**

<b><u>General Description of Obstacle</u></b>	<b><u>2010 ADAAG</u></b>	<b><u>MAAB 521 CMR</u></b>	<b><u>Type of Action to be Taken</u></b>	<b><u>P</u></b>	<b><u>F</u></b>	<b><u>TF</u></b>	<b><u>Cost Estimate</u></b>
<b><u>Parking</u></b> <b><u>Main Entrance</u></b> The 6 designated accessible parking spaces near the main entrance have signage that is 6” to 16” too low; excessive cross slopes that vary from 3.2% to 7.6%, a van designated space with only a 4’ wide access aisle, and 2 spaces without an access aisle.  See Photo Senior Center 1.	502 703.7	23	Reconstruct and repave the accessible parking spaces as follows: stripe and designate at least one 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); stripe and designate at least two passenger vehicle accessible spaces at a width of 8’ with a 5’ access aisle (as this is a senior center additional spaces would be preferred but not required per the total # of spaces in the parking lot); 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.	1	3	N	Up to \$7,500
<b><u>Side Entrance/Egress</u></b> The 2 designated accessible parking spaces near the side entrance/egress lack access aisles, neither space is designated as van accessible, and the inside space has an excessive cross slope of 2.8%.  See Photo Senior Center 2.			Option #1: Discontinue the use of the spaces as accessible as they are not near the accessible entrance.  Option #2: Reconstruct the spaces in accordance with that described above.	1  1	1  3	N  N	\$0  Up to \$3,500
<b><u>Exterior Stairs</u></b> <b><u>Main Entrance</u></b> The stairs have a railing on one side only and the existing railing bottom extension does not go the slope distance of one tread, then 12” parallel to the ground.	505.2 505.10	27.4.1 27.4.3	Modify the existing bottom extension so it goes the slope distance of one tread, then 12” parallel to the ground. Install an additional railing as follows:  Railings must round or oval in x-section and 1¼” – 2” in outside diameter. Railings should be at a height of 34” to	1	3	N	Up to \$350

<b>Side Egress Stairs</b> The stairs have railings that are not round or oval in shape, and lack top and bottom extensions.  See Photo Senior Center 3.	505.7.1 505.10	27.4.4 27.4.3	38" a.f.f. to the top of the handrails. Extensions must be provided the slope distance of one tread then 12" at the bottom of the stairs and 12" parallel to the floor at the top of the stairs.  Install railings on both sides of the stairs as detailed above. <i>Note: It may not be feasible to provide bottom extensions as the stairs end in a driveway and extensions would create a driving and plowing hazard.</i>	1	3	N	Up to \$500
<b>Ramp into Building</b> The ramp running slopes vary from 8.5% to 8.6% in a few locations, which exceeds the maximum allowed of 8.3%. The level landing at the ramp change in direction is only 4 feet and not the minimum required 5 feet. The lower railing is 20¼" a.f.f. to the top of the gripping surface which is outside the allowed range of 18" to 20" a.f.f.	405.2 405.7 505	24.2 24.4 24.5	Due to the excessive cost to modify the concrete ramp and railings vs. the benefit gained, a variance s/b sought to retain the existing ramp and railings.	1	1	I	\$0
<b>Exterior Accessible Route of Travel</b> The concrete walkway to and from the front picnic area has running slopes that vary from 5.4% to 7.8% which exceeds that for a walkway.	405 505	24.5	Install railings paired railings on both sides of the roughly 14 foot segment of the accessible route of travel. 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.	1	3	N	Up to \$5,000+
<b>Front Picnic Tables</b> The two picnic tables at the front of the senior center are inaccessible due to insufficient knee depth, knee clearance, and/or clear width.  See Photo Senior Center 4.	226.1 902 403	19 22	At least 5% or at least one table must be accessible. Purchase an accessible picnic table and place in the same area as the existing picnic table. The table surface s/b 28" to 34" a.f.f. to the top with at least 27" knee clearance, 30" clear width, and 19" depth.	2	2	I	Up to \$750
<b>Door Operating Forces and Closing Speeds</b> The side egress door and Interior doors with closers (including bathrooms and the lift) do not fully comply with the maximum allowed operating force of 15 lbs. for an exterior door and 5 lbs. for an interior door and the minimum closing speed requirement of 6 seconds under 521 CMR. Assessments ranged from 2 to 4 seconds closing speed and up to 20 lbs. operating force.	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.	2, 3	2	I	\$0
<b>Door Signage</b> Tactile designation signage is not provided at the following locations:  <b>Level 1</b> <ul style="list-style-type: none"> <li>Hallway (2)</li> <li>Reception Office</li> <li>Director's Office</li> <li>Store (2)</li> <li>Offices behind store (2)</li> <li>Closet by 2 offices</li> <li>Hallway door to dining</li> <li>Office by kitchen</li> </ul>	703	41.1	Install, replace, and/or relocate accessible compliant designation signage on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and Brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f.. from the baseline of the lowest character and 60" max. a.f.f. to the baseline of the highest character. Under 521 CMR, signage s/b 60" a.f.f. to the centerline of the sign. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	2, 3	2	I	Up to \$4,125

<ul style="list-style-type: none"> <li>• Basement (2)</li> <li>• Large meeting room closets (2)</li> <li>• Double doors to large meeting room (2)</li> <li>• Closet by kitchen</li> <li>• Kitchen</li> </ul> <p><u>Level 2</u></p> <ul style="list-style-type: none"> <li>• Door to billiards (2)</li> <li>• Billiards closets (2)</li> <li>• Doors to exercise/art (2)</li> <li>• Exercise/art closets (2)</li> <li>• Door at top of stairs to shuffleboard</li> <li>• Door to meeting room</li> <li>• Meeting room storage (3)</li> <li>• Meeting room door by bathroom</li> </ul> <p>See Photo Senior Center 5.</p>							
<p><b><u>Door Hardware</u></b> The following interior doors have non-compliant knob style hardware:</p> <p><u>Level 1</u></p> <ul style="list-style-type: none"> <li>• Reception Office</li> <li>• Director's Office</li> <li>• Offices behind store (2)</li> <li>• Closet by 2 offices</li> <li>• Office by kitchen</li> <li>• Closet by kitchen</li> </ul> <p><u>Level 2</u></p> <ul style="list-style-type: none"> <li>• Door to billiards (1)</li> <li>• Billiards closets (1)</li> <li>• Doors to exercise/art (2)</li> <li>• Exercise/art closets (1)</li> <li>• Door to meeting room</li> <li>• Meeting room storage (3)</li> <li>• Meeting room door by bathroom</li> </ul> <p>See Photo Senior Center 6.</p>	404.2	26.11	<p>Install lever-style or similar accessible compliant hardware on the interior doors.</p> <p><i><u>Note:</u> Depending on the door and type/quality of hardware, lever hardware may vary from \$75 to \$275 per unit. The estimate provided is at the mid-range (\$150) for the interior doors.</i></p>	2	2	I	Up to \$2,550+
<p><b><u>Doors with Glass Panes</u></b> The following doors have glass panes that exceed the maximum viewing height of 43":</p> <p><u>Level 1</u></p> <ul style="list-style-type: none"> <li>• Entrance door</li> <li>• Hallway</li> <li>• Reception Office</li> <li>• Store (2)</li> <li>• Hallway door to dining</li> <li>• Double doors to large meeting room (2)</li> </ul> <p><u>Level 2</u></p> <ul style="list-style-type: none"> <li>• Door to billiards (2)</li> <li>• Doors to exercise/art (2)</li> </ul>	404.2.11	NA	<p>Doors, gates, and side lights adjacent to doors or gates, containing panels that permit viewing through the panels shall have the bottom of at least one panel located 43 inches maximum a.f.f.</p> <p>Frost or block the glass panes.</p>	4	2	N	\$0

<ul style="list-style-type: none"> <li>Door to meeting room</li> <li>Meeting room door by bathroom</li> </ul> <p><i>Note: A tolerance of 1" is allowable up to a maximum height of 44" a.f.f.</i></p> <p>See Photo Senior Center 7.</p>							
<p><b>Reach Range</b></p> <p>The following exceed the maximum reach range height for an adult under the 2010 ADA Standards:</p> <ul style="list-style-type: none"> <li>Level 1 sign-in table w/scanner for completing survey form (41¼" a.f.f.)</li> <li>Level 1 Large Meeting Room wall-mounted telephone (64" a.f.f.)</li> <li>Level 2 Exercise/Arts Room wall-mounted telephone (57" a.f.f.)</li> <li>Level 2 Exercise/Arts Room coat hooks (9 at 60" a.f.f.)</li> <li>Level 2 hallway coat hooks (8 at 62" a.f.f.)</li> </ul>	308.2 308.3	6.5 6.6	<p>Relocate the scanner to a table at a height of no more than 36" a.f.f. with at least 27" of knee clearance.</p> <p>Lower the telephones to a height of no more than 48" a.f.f.</p> <p>Provide a minimum of 5% of coat hooks or equivalent space on a coat rack at a height of no more than 48" a.f.f. at both the Ground Level 1 and Level 2 locations.</p>	2  4 4	1  3 2	I  N I	\$0  Up to \$200 \$20
<p><b>Desk/Table Knee Clearance</b></p> <p>The following desks/tables do not provide the minimum required 27" of knee clearance:</p> <ul style="list-style-type: none"> <li>Level 1 Large Meeting Room (10 tables with only 25" knee clearance)</li> <li>Level 2 Meeting Room (6 tables with only 26½" knee clearance)</li> </ul>	226.1 306.2 306.3	35	Block at least one desk/table at each separate location to achieve 27" of knee clearance. If blocking not feasible, replace as necessary with desks/tables that have 27" knee clearance.	2	2	I	\$0 to \$250
<p><b>Clear Widths</b></p> <p>The doorways to the following rooms/locations have clear widths that vary from 25½" to 29½" which do not meet the minimum 32" clear width requirement for a doorway:</p> <p><u>Level 1</u></p> <ul style="list-style-type: none"> <li>Front Reception (25½")</li> <li>Store Double Doors (29½" with one door closed)</li> </ul> <p>In addition, the front table at the Reception Area reduces the clear width on the accessible route of travel to only 27½", which is less than the minimum required 36".</p>	404.3.1  403.5	26.5  20.3	<p>Modify the Reception Door as may be required as a reasonable accommodation request.</p> <p>Keep both the Store Double Doors open at all times.</p> <p>Relocate the front table or replace with a smaller table to achieve the minimum required 36" clear width.</p>	2  2	1  1	I  I	\$0  \$0
<p><b>Sinks</b></p> <p><u>Billiards Sink</u></p> <p>The sink provides only 23½" knee clearance, the piping is not wrapped, the faucets require pinching and twisting of the wrist, and the soap and towel dispensers are too high.</p>	306.3 309 606.5 308.2 308.3 602.5 602.6	32.7 6.5 6.6 36.3 36.5	<p>Option #1: Discontinue use of the sinks and drinking fountains.</p> <p>Option #2: Discontinue the use of the drinking fountains and modify the existing sinks or provide new ones as follows: the sinks s/b no more than 34" a.f.f. to the top of the sink with 27" of knee clearance and 30" of clear</p>	2  2	1  3	I  N	\$0  Up to \$2,500+

<u>Exercise/Arts Sink</u> The sink lacks knee clearance, has a drinking fountain spout that is too far from the front edge and has an operating force in excess of 5 lbs., and does not provide a flow of water that is at least 4" high.  <u>Meeting Room Sink</u> The sink lacks knee clearance, has a drinking fountain spout that is too far from the front edge and has an operating force in excess of 5 lbs., and does not provide a flow of water that is at least 4" high.  See Photos Senior Center 8 and 9.			width; sink piping s/b wrapped, guarded, or insulated; faucets s/b lever style; and dispensers no more than 48" a.f.f..	2	3	N	Up to \$3,750+
			Option #3: Same as Option #2 above but also modify the drinking fountain so that the spout is 5" maximum from the front edge with the water flow w/in 3" of the front edge and have a flow of water at least 4" high. The operating force of the spout controls should have no more than 5 lbs. of operating force.				
<u>Stairs to Level 2</u> Both the interior and outside railings are too low and lack top and bottom extensions. The inside railings are not continuous.  See Photo Senior Center 10.	505.3 505.4 505.10	27.4.1 27.4.2 27.4.3	Modify the stair railings such that there are continuous railings on the inside and both the inside and wall-mounted railings have top and bottom extensions. The railings must be round or oval in x-section at a height of 34" to 38" a.f.f. to the top of the gripping surface. The railings must have top extensions 12" parallel to the floor and bottom extensions the slope distance of one tread then 12" parallel to the floor.	2	3	N	Up to \$450
<u>Level 1 Bathrooms</u> <u>Men's and Women's Bathrooms</u> The sink piping is not wrapped, guarded, or insulated  The mirror is 5¾" too high.  The soap and towel dispensers are 4" to 5" too high.  The water closet stall doors open in and not out, are not self-closing, and lack interior and exterior pull devices.  The coat hooks are 14" to 15" too high.  The toilet cover dispensers are 18" to 19" too high.  The toilet paper dispensers are 4" to 5" too close to the front of the water closet.  The water closets are 2½" to 3" too far from the nearest wall, 4" to 4½" too close to the far wall, and 1½" to close in front of the water closet. <i>Note: The women's water closet has items placed on the far side and front of the water closet further restricting the clear width.</i>  The rear and side grab bars are only 36" long, which are 6" too short. The rear grab bars are also 5" to 5½" too far	606.5  603.3  308.2 308.3  404.2 604.8  308.2 308.3  308.2 308.3  604.7  604.2 604.3  604.5	30.9.5  30.11  30.12  30.6.1  30.6.1  30.12  30.7.6  30.7.2  30.8	Wrap, guard, or insulate the piping.  Lower the mirror to a height of no more than 40" a.f.f. to the bottom of the reflecting surface.  Lower the dispensers to a height of no more than 42" a.f.f.  Reverse the stall doors and/or stoppers so they open out; modify/adjust the stall doors so they fully self-close; and install interior and exterior pull devices at a height of between 34" to 48" a.f.f.  Lower the coat hooks to a height of no more than 48" a.f.f.  Lower the dispensers to a height of no more than 42" a.f.f.  Relocate the toilet paper dispensers so they are 7" minimum and 9" maximum in front of the water closet measured to the centerline of the dispenser.  Modify/relocate the water closets so they are 18" o.c. to the near wall and 42" o.c. to the far wall. Seek a variance to retain the 40½" front water closet clearance. Remove the items near the women's water closet.  Replace the grab bars with ones that are 42" long. The rear grab bars s/b no more than 6" from the interior corner.	3  3  3  3  3  3  3	2  2  2  2  2  2  2	I  I  I  I  I  I  I  N  I	\$0  \$0  \$0  Up to \$100  \$0  \$0  \$0  Up to \$2,400  Up to \$300

from the interior corner.							
<u><b>Women's Bathroom Only</b></u> The water flush control is on the wrong side.	604.6	30.7.5	Replace the water closet tank or the entire water closet so that the flush control is on the open or approach side.	3	3	N	\$125 to \$350
<u><b>Men's Bathroom Only</b></u> The towel dispenser protrudes 8¾" into the accessible route at a height of between 27" and 80" a.f.f.	307.2	20.6.1	Relocate the dispenser so that it is not in the accessible route of travel or place a fixed object underneath it.	3	2	I	\$0
The urinal is located within a stall that provides only 22" of clear width at the door and lacks maneuverability. In addition, the stall door opens in, is not self-closing, and lacks interior and exterior pull devise. The urinal rim height is 5" too high and has a flush control that is 7" too high. The coat hook is 14" too high.	404.2 305.3 308	30.6.1 30.10.2 6.3 30.10.3	Remove the stall partitions to achieve the minimum required 32" doorway clear width and 60" diameter turning radius. Lower the urinal so that is is no more than 17" a.f.f. at the rim with a flush control no more than 44" a.f.f. If a coat hook remains, it s/b no more than 48" a.f.f.	3	3	N	Up to \$1,000
<b>See Photos Senior Center 11 and 12.</b>							
<u><b>Level 2 Unisex Accessible Bathroom</b></u> The coat hook is 14½" too high, the toilet cover dispenser is 14" too high, and the soap dispenser is 12¼" too high.	308.2 308.3	6.5 6.6 30.12	Lower the coat hook to a height of no more than 48" a.f.f. and the dispensers to a height of no more than 42" a.f.f.	3	2	I	\$0
The rear grab bar is only 36" long.	604.5	30.8	Replace the rear grab bar with one that is 42" long.	3	2	I	\$150

Total up to \$35,745+



## Senior Center Accessibility Assessment Photos



Photo Senior Center 1



Photo Senior Center 2



Photo Senior Center 3



Photo Senior Center 4

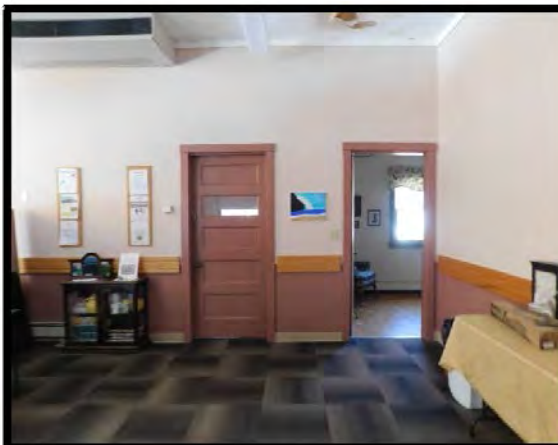


Photo Senior Center 5

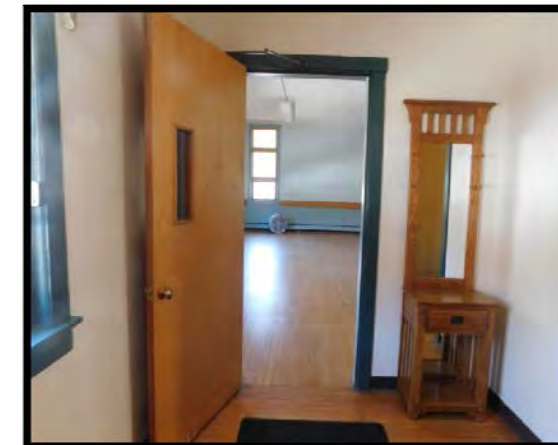


Photo Senior Center 6

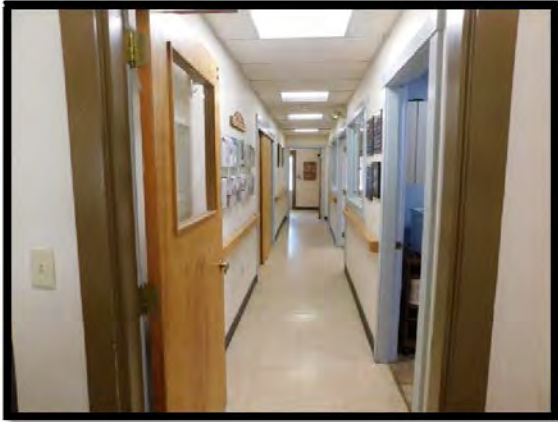


Photo Senior Center 7

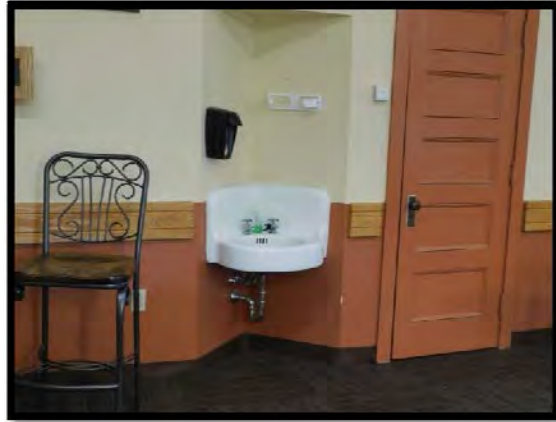


Photo Senior Center 8



Photo Senior Center 9

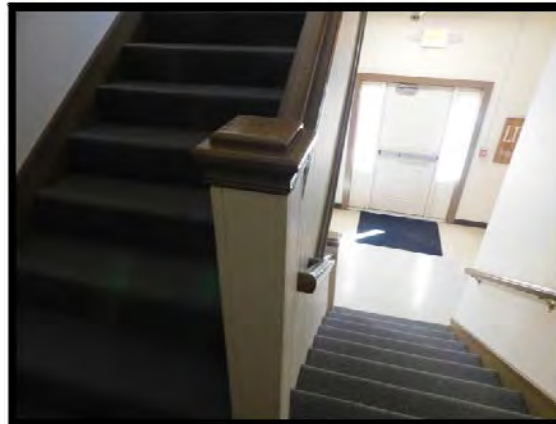


Photo Senior Center 10

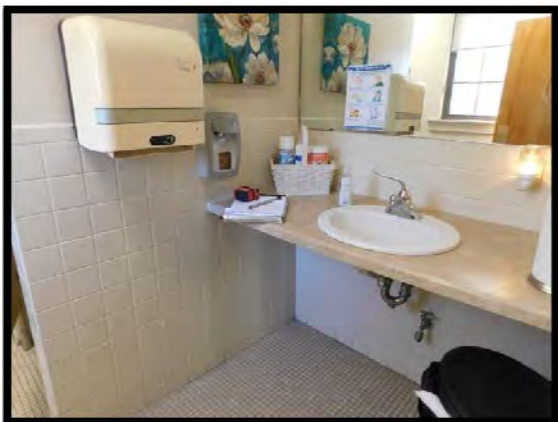


Photo Senior Center 11

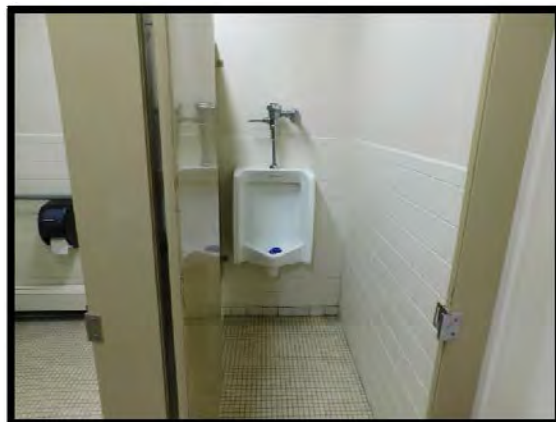


Photo Senior Center 12

## **WHITINSVILLE SOCIAL LIBRARY**

**Function and Description of Facility and Programs:** The Whitinsville Social Library is the sole public library for the town of Northbridge, MA. It is administered by the Whitinsville Social Library Corporation and is funded by the Corporation and the town of Northbridge. "Social" in the Library name indicates it was originally a subscription library. Only four libraries in the United States still retain the word social in their name. In 1913, the present 2 story (2 level plus a finished basement) building on Church Street was constructed to serve as the library and sold to the town of Northbridge in 1917 on the condition that the town would maintain and properly care for it.

The Church Street building remains essentially unchanged except for a small addition for accessibility in the 1990s and the opening of the book stacks to the public. Original furnishings and five working fireplaces still remain today.

The Whitinsville Social Library hosts many events each month and throughout the year for children, teens, and adults. The Library's Historical Room on the second level is generally closed to the public and open only certain days of the month or by appointment.



**Responsible Party:** Board of Library Trustees

### **General Description or Obstacle Which Limits Mobility or Access:**

#### **Exterior General**

There are two apparent designated accessible parking spaces (*Note: At the time of assessment snow was plowed into and piled in the apparent shared access aisle and in one designated space. In addition, signage was partially knocked over so the heights could not be determined. It is important that all accessible parking spaces and access aisles for a building be properly cleared and maintained at all times.*). The running slopes of the access aisle and spaces exceed the maximum allowed of 2.0%.

**Town of Northbridge Accessibility Plan**



The actively used First Floor entrance on Church Street has stairs with railings (one set of stairs at entrance and one set of stairs at sidewalk) which lack bottom extensions and have top extensions that are 4" too short. No directional signage to the accessible entrance is provided.

#### Library Interior (General)

Interior and exterior doors with closers have excessive operating forces and close too fast. A number of interior doors lack tactile designation signage with some doors also having non-compliant knob hardware. Tables and desks do not meet the minimum required 27" knee clearance requirement. The Level 1 drinking fountain is "high" only. Some doorways have thresholds that are unbeveled and exceed the maximum height allowed. Light switches exceed the maximum reach range under the 2010 ADA Standards.

#### Clear Widths

Stack clear widths on the First and Ground Levels are reduced to less than 36" due to the metal railings and stairs connecting the Ground and First Floor Levels. Some doorways have less than the required 32" clear width, however, as they are staff only areas and/or not on an accessible route of travel, no further action is required.

#### Stairs

The original stairs between levels and to the Historic Room have railings that are not fully continuous, not fully oval or round, lack extensions, and are too wide and too low.

#### Public Bathrooms

The Level 1 Bathroom has signage that is too high and also lacks the Universal Symbol of Accessibility. In addition, the soap dispenser and mirror are too high..

The Level 2 Bathroom has a sink shut-off that is not wrapped or insulated. In addition the soap dispenser and mirror are too high.

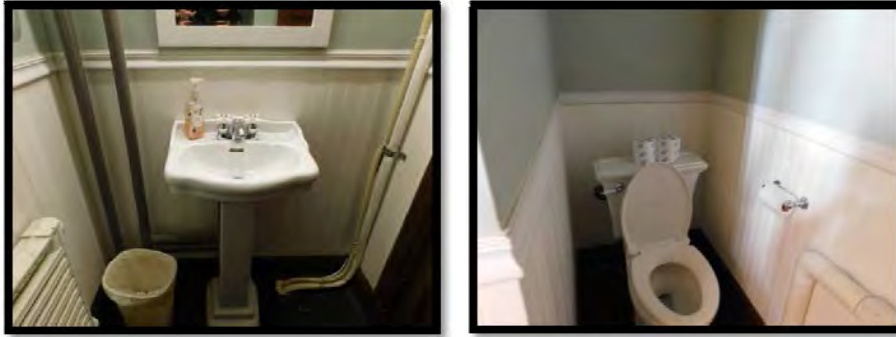
#### Staff Only Areas

The Level 1 Staff Work Room has a spiral staircase to a mezzanine storage area with open risers and railings that are too low, lack extensions, and provides only one railing. The Ground Level Staff Kitchen has a sink with exposed piping, a sink basin that is too deep, and faucets that require pinching and twisting of the wrist. As these areas are closed to the public and used solely by library staff, future modifications would only be required as a result of a reasonable accommodation request. *See Photos Below.*



Library Director's Bathroom. The Library Director's Bathroom is wholly non-compliant with inadequate clear width at the water closet and insufficient maneuverability. The sink is pedestal-style thereby lacking knee depth. In addition, the faucets require pinching and twisting of the wrist. The mirror and the soap dispenser are too high, the toilet paper dispenser is too close to the front of the water closet,

the lights are operated using a pull chain that is not within reach range and also require pinching and twisting of the wrist, and the water closet lacks grab bars. As this bathroom is used solely by and at the discretion of the Library Director, no other action is required for this bathroom at the present time, unless necessitated by a reasonable accommodation request. *See Photos Below.*



Light switches throughout vary in height with some at 51" – 52" a.f.f., which exceeds the maximum height under the 2010 ADA Standards of 48" by 3" to 4". As light switches are controlled solely by library staff, modifications would only be necessitated as a result of a reasonable accommodation request.

### **Whitinsville Social Library Accessibility Assessment**

<b><u>General Description of Obstacle</u></b>	<b><u>2010 ADAAG</u></b>	<b><u>MAAB 521 CMR</u></b>	<b><u>Type of Action to be Taken</u></b>	<b><u>P</u></b>	<b><u>F</u></b>	<b><u>TF</u></b>	<b><u>Cost Estimate</u></b>
<b><u>Designated Accessible Parking</u></b> Due to snow deposited in the accessible parking spaces and access aisle, complete measurements were not possible. The following determinations were made based on limited measurements and visual assessment:  The spaces and access aisles have running slopes that vary up to 4.3%, which exceeds the maximum allowed of 2.0%. The signage height could not be determined.  <i>See Photo Library 1.</i>	502 703.7.2	23	Van accessible parking spaces s/b at a width of 11' with a 5' access aisle and a passenger vehicle space at a width of 8' with a 5' access aisle. The access aisle can be shared between the designated van space and the passenger vehicle space. Signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located no more than 10' in front of the spaces.  In the future, when the parking area is resurfaced, the slopes of the accessible parking spaces and access aisle should not exceed 2.0% in any direction.	1	3	L	\$0
<b><u>Directional Signage</u></b> Outside directional signage at the front of the building directing patrons to the accessible entrance is not provided.	216	41.1.3	Provide directional signage noting the accessible side/rear entrance.	1	2	I	\$100
<b><u>First Floor Entrance, Stairs, and Stair Railings</u></b> Both the front sidewalk and doorway stairs have railings that do not fully extend at the top of the stairs (only 8") and lack bottom extensions.  <i>See Photo Library 2.</i>	505.10	27.4.3	Stair railings need to be modified, as allowable and/or feasible, so the bottom railing extensions are the slope distance of one tread then 12" parallel to the ground and the top railing extensions are 12" parallel to the ground.	1	3	N	Up to \$2,000

<b><u>Door Operating Forces and Closing Speeds</u></b> Exterior and interior doors with closers (including bathrooms) do not comply with the minimum closing speed requirement of 6 seconds or the maximum operating force of 15 lbs. for an exterior door and 5 lbs. for an interior door.	404.2.8 404.2.9	26.9 26.8	Adjust the door closers such that the closing speed is at least 6 seconds and the operating force does not exceed 15 lbs. for the main entrance door and 5 lbs. for the interior doors.	1, 2	2	I	\$0
<b><u>Signage</u></b> The following interior doors lack tactile designation signage: <u>Level 2</u> <ul style="list-style-type: none"> <li>• Historical Room</li> <li>• Door to newer staircase</li> </ul> <u>Level 1</u> <ul style="list-style-type: none"> <li>• Door to newer staircase</li> <li>• Janitor's closet</li> <li>• Library Director's office</li> <li>• Library Director's office bathroom</li> <li>• Library Director's office closet</li> <li>• Storage Room near staff room</li> <li>• Staff Room</li> </ul> <u>Ground Level</u> <ul style="list-style-type: none"> <li>• Pass-thru Staff Kitchen to storage</li> <li>• Staff Kitchen</li> <li>• Staff Storage</li> <li>• Door to stairs</li> <li>• Mechanical</li> <li>• Door to Stacks</li> <li>• Storage in stack area (2)</li> </ul> <p><i><u>Note:</u> The Level 1 bathroom signage lacks the Universal Symbol of Accessibility.</i></p> <p>See Photos Library 3 and 4.</p>	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).  Provide signage for the accessible bathrooms that includes the Universal Symbol of Accessibility.	2, 3	2	I	Up to \$3,125+
<b><u>Door Hardware</u></b> The following interior doors have knob-style hardware: <u>Level 1</u> <ul style="list-style-type: none"> <li>• Janitor's closet</li> <li>• Library Director's office</li> <li>• Library Director's office bathroom</li> <li>• Library Director's office closet</li> <li>• Storage Room near staff room</li> <li>• Staff Room</li> </ul> <u>Ground Level</u> <ul style="list-style-type: none"> <li>• Staff Kitchen</li> <li>• Door to stairs</li> <li>• Mechanical</li> <li>• Storage in stack area (2)</li> </ul> <p>See Photo Library 4.</p>	404.2	26.11	Install lever-style or similar accessible compliant hardware on the interior doors. This is not required for the First Level lobby doors near the entrance if the doors are kept in a fixed position (See First Level Front Lobby Doors below).  <p><i><u>Note:</u> Depending on the door and type/quality of hardware, lever hardware may vary from \$75 to \$275 per unit. The estimate provided is at the mid-range (\$150) for the interior doors.</i></p>	2	2	I	Up to \$1,650

<b><u>Tables and Work Stations</u></b> Tables/work stations at the following locations do not meet the minimum required knee clearance: <ul style="list-style-type: none"> <li>Level 2 Historical Room meeting table (26" knee clearance)</li> <li>Level 1 Adult (3 tables in 3 separate locations w/25" knee clearance)</li> <li>Level 1 Teen/Tween Room (4 tables w/25½" knee clearance)</li> <li>Level 1 Computer Tables (1 w/25¼" knee, 2 w/8" toe clearance and 23¼" clear width)</li> <li>Ground Level (3 Tbles w/25" to 26" knee clearance)</li> </ul> <p>See Photos Library 5 and 6.</p>	226 306.3	35	Raise (adjust if optional or "block") or modify one table/computer work station in each area to achieve the minimum required 27" of knee clearance and 9" toe clearance. If blocking is not feasible, a new compliant table or computer work station should be provided. In addition, there must be at least 30" of clear width and clear floor space.	2	2	I	\$50 to \$2,100
<b><u>Drinking Fountain</u></b> The drinking fountain is non-compliant as it is a "high" only fountain.  <p>See Photo Library 7.</p>	211 306 602	36	Option #1 – Discontinue use of the existing drinking fountain.  Option #2 – Provide an additional "low" drinking fountain as follows:  Protruding objects compliance of no > 4" protrusion between 27" and 80" a.f.f. (307); 30"x48" clear space requirement (305), and knee/toe clearance (306). Knee clearance is 9" to 27" a.f.f; 25" deep max. at 9" a.f.f. or 11" deep min at 9" a.f.f. and 8" deep min at 27" a.f.f. Width of knee clearance s/b 30" wide min (306.3). Toe clearance as part of c.f.s. 17" min – 25" max, 9" high a.f.f., 30" wide (306.2). The spout s/b 15" min from wall and 5" max from the front edge of the unit (602.5). Flow of water 4" high minimum and within 3" of the front edge (36.3). The spout height s/b 36" max. a.f.f. The controls s/b operable w/one fist; no > 5 lbs force (309.4).	4	3	N	Up to \$2,000
<b><u>Check-out Counter</u></b> The check-out counter exceeds the maximum counter height of 36" by 1½". See Photo Library 8.	904.4	7.2	Modify the counter so that a counter is provided that is 36" long by no more than 36" high a.f.f. with a minimum of 27" of knee clearance.	2	3	N	Up to \$300+
<b><u>Door Thresholds</u></b> The threshold to the Level 1 Staff Room has a 1" threshold with no bevel or a bevel in excess of a 1:2 slope.  <p>See Photo Library 9.</p>	404.2	26.10	Modify the threshold so that the maximum 1:2 beveled change in level surface is no more than ½" as may be required as a reasonable accommodation request.	2	2	N	\$150+
<b><u>Reach Range</u></b> Staff area light switches exceed the maximum reach range under the 2010 ADA Standards: 3" to 4".	308.2 308.3	6.5 6.6	As necessitated through a reasonable accommodation request, lower the light switches to a height of no more than 48" a.f.f.	4	3	L	TBD
<b><u>Book Stack and Accessible Route Clear Widths</u></b> <b><u>First Level</u></b> The clear width to the left and right of the interior closed metal staircase is	403.5	12.2 20.3	Due to the excessive cost to modify the stacks and/or staircase and railings, seek a variance to retain the existing clear widths on the First and Ground Levels.	2	1	I	\$0

<p>reduced to 34", which does not meet the required 36" clear width.</p> <p><u>Ground Level</u> The clear width to the left and right of the interior closed metal staircase is reduced to 35", which does not meet the required 36" clear width.</p> <p>A desk at the end of the ESL stack reduces the clear width to 26", which is 10" too narrow.</p> <p>See Photos 10 and 11.</p>			Remove the desk on the Ground Level to achieve the required minimum 36" clear width.				
<p><b>Interior Stairs</b> The older/historic stairs to the First and Second Levels have railings that are too low (28" to 29" a.f.f.), too wide (3" to 3¼"), not fully continuous, not round or oval in shape, and lack extensions.</p> <p>The interior metal stairs and railings from the Ground Level to Level 1 are currently closed and not in use. These stairs have risers that are 7¾", which are ¾" too high; lack top and bottom extensions; have railings that 2¼" wide, which exceeds that allowed by ¼"; have railings that are not round or oval in shape; and railings that are 30" a.f.f., which are 4" to 8" too low.</p> <p>See Photo Library 12.</p>	504 505	27	<p>Seek a variance to retain the existing older/historic railings.</p> <p>Keep the stairs closed from use.</p>	2  2	1  1	I  I	\$0  \$0
<p><b>Bathrooms</b> <u>Level 1 and Level 2</u></p> <p>The mirrors are 1¼" to 2¼" too high.</p> <p>The soap dispensers are 4" to 6" too high.</p> <p><u>Level 1 Only</u> The tactile designation signage is 6" too high and lacks the Universal Symbol of Accessibility.</p> <p><u>Level 2 Only</u> One of the sink shut-offs is not fully wrapped or insulated.</p> <p>See Photos Library 13 and 14.</p>	603.3  308.2 308.3  703.4 703.7.2  606.5	30.11  30.12  41.2 41.1.3  30.9.5	<p>Lower the mirrors so that they are no more than 40" a.f.f. to the bottom of the reflecting surface.</p> <p>Lower the dispensers to a height of no more than 42" a.f.f.</p> <p>Lower the signage to a height of no more than 60" o.c. a.f.f. and include the Universal Symbol of Accessibility.</p> <p>Wrap or insulate the piping.</p>	3  3  3  3	2  2  2  2	I  I  I  I	\$0  \$0  \$25 \$0  \$25

Total up to \$11,475+



## Whitinsville Social Library Accessibility Assessment Photos



Photo Library 1



Photo Library 2



Photo Library 3

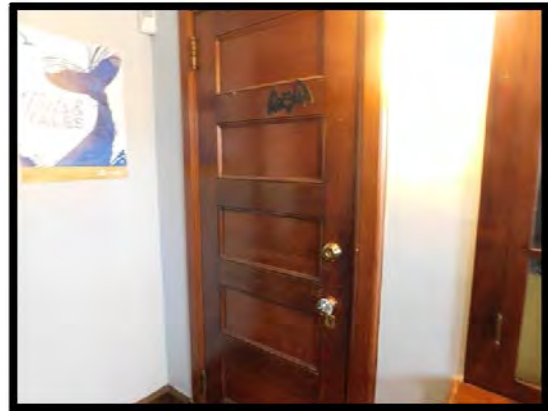


Photo Library 4



Photo Library 5



Photo Library 6

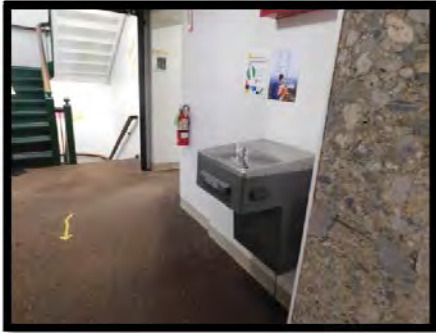


Photo Library 7



Photo Library 8



Photo Library 9

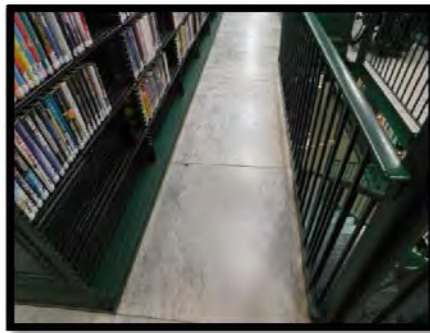


Photo Library 10



Photo Library 11

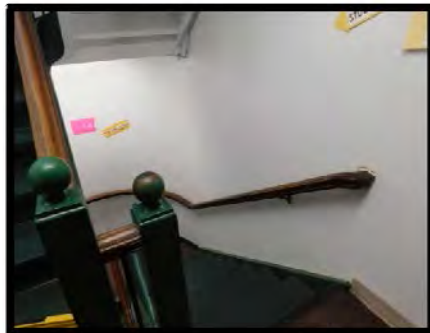


Photo Library 12

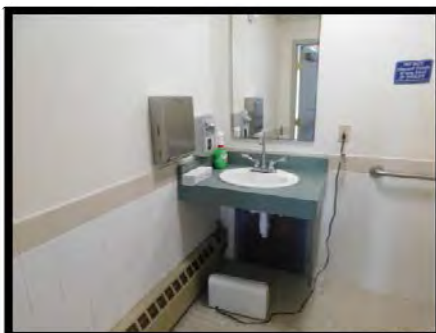


Photo Library 13

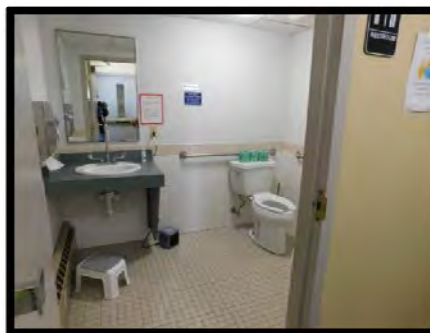


Photo Library 14

## **SCHOOL ADMINISTRATION BUILDING**

**Description of Facility and Programs:** The School Administration Building is a 2-story wooden frame structure that dates back to 1875 and is also known as the Arthur Whitin House. School administrative offices are housed on the 1<sup>st</sup> and 2<sup>nd</sup> levels with the basement and attic used solely for storage.



**Responsible Party:** Board of Selectmen, School Committee.

### **General Description or Obstacle Which Limits Mobility or Access:**

#### **Parking, Accessible Route of Travel, and Stairs**

There is multiple striping (yellow, white) for the accessible parking space and it is not clear as to which color is intended to designate the access aisle and space. The signage for the accessible space is too high.

There is a 1" abrupt change in level surface from the asphalt to the wooden ramp. The ramp railings are wholly non-compliant as they are rectangular in shape; severely deteriorated, rotted, and not useable in various locations; are too low; lack top and bottom extensions; and have slightly less than 48" between the railings. The ramp running slopes and cross slopes exceed the maximum allowed and the level landing between ramp runs is 1 foot too narrow.

The stairs have railings that are too low and lack top and bottom extensions. The top stair tread nosing is abrupt and too great of a projection.

The porch entrance door closes too fast whereas the main entrance door has both an excessive operating force and closes too fast. There is a 4" abrupt change in level surface from the porch to the inside of the building. In addition, there is only 25½" clear width at the entrance when one door is opened and the other is in a fixed position. The door also has non-compliant knob style hardware.

### Interior

There is no accessible route of travel between levels with the only means of access being via stairs. The stair railings are non-compliant as they are not located on both sides of the stairs, are too low, not fully continuous, and lack top and bottom extensions.

Interior doors lack tactile designation signage, have knob-style hardware, and doorways have inadequate clear width. A number of doors also have inadequate clearance on the pull side of the door. Light switches on both Levels and a coat rack near the Level 1 Reception Area are not within reach range.

The Level 1 staff kitchenette has a sink/counter that is 2" too high, lacks knee clearance, has insufficient clear width in front of the sink, and has dispensers that are too high.

The bathrooms on Level 1 and Level 2 are wholly non-compliant. Bathrooms lack sufficient maneuverability for water closet use; water closets lack grab bars and are too low; the Level 2 water closet flush control is on the wrong side; sinks lack knee clearance, have piping that is not insulated or wrapped, and have faucets that require pinching or twisting of the wrist; dispensers and light switches are not within reach range; and mirrors are too high.

### Commentary on Second Level

According to school personnel, individuals with offices on Level 2 meet as required on the main or first level.

At a minimum, vertical access and related modifications may be necessitated through a reasonable accommodation request or as required through a change in use and full public access to the second level. If the current use remains in place with limited or no public access and personnel conducting all public business on the first floor level, no further action is required.

If public business is conducted on the second level or activities and programs offered then vertical access will be required as well as modifications to address identified areas of non-compliance. Architect and/or engineering services will be required to develop design plans and specifications for level 2 access. Depending on level 2 costs, inclusive of required structural and electrical upgrades, 100% accessible compliance could be required under MA 521 CMR as well as other mandated State Building Code requirements. As a result, total costs could easily approach \$1 million or more.



## School Administration Accessibility Assessment

General Description of Obstacle	2010 ADAAG	MAAB 521 CMR	Type of Action to be Taken	P	F	TF	Cost Estimate
<b>Parking</b> There is multiple striping (yellow, white) for the accessible parking space and it is not clear as to which color is intended to designate the access aisle and space. The signage for the accessible space is 3" too high.  See Photo School Admin 1.	502	23	Restripe 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 an 8' access aisle (2010 ADA Standards). Signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR).	1	3	N	\$250
<b>Entrance Ramp</b> There is a 1" abrupt change in level surface from the transition of asphalt to the wooden ramp.  The ramp is unsafe and wholly non-compliant. The ramp has running slopes that vary up to 10.9%, which exceeds the maximum allowed of 8.3%. The initial 8 feet of the ramp has a cross slope of up to 4.0%. There is less than 48" between railings in some locations and the landing between ramp segments is only 4 feet wide. The railings are rectangular in shape and lack top and bottom extensions. The lower and upper railings are up to 2" too low. In addition, the railings are rotted and deteriorated and cannot support weight or grasping. In addition, there are areas where there are exposed nails and splintered wood.  See Photos School Admin 2, 3, 4, and 5.	403  405	22  24	Modify the base of the ramp at the transition to eliminate the abrupt change in level surface.  Remove the existing ramp and construct a new concrete or wooden ramp as follows:  The running slope should not exceed 8.3% and the cross slope should not exceed 2.0%. There must be at least 48 inches between the ramp railings and the landing at the directional change should be level (no more than 2.0% in any direction) with at least 60 inches of clear space. The railings should be paired at 34" to 38" a.f.f. (top railing) and 18" to 20" a.f.f. (bottom railing), have an outside diameter of 1½" to 2", be round or oval in shape, and have 12" extensions at the top and bottom of the ramp parallel to the ground.	1  1	3  3	I  I	Up to \$150  Up to \$25k+
<b>Entrance Stairs</b> The stair railings are only 30" a.f.f., which are at least 4" too low and lack top and bottom extensions.  The top nosing at the porch is ¾" deep and not beveled.  See Photo School Admin 6.	505.4 505.10  504.5	27.4.2 27.4.3  27.3	Replace the existing railings with ones that are 34" to 38" a.f.f. to the top of the gripping surface and with 12" top extensions parallel to the ground and bottom extensions the slope distance of one tread then 12" parallel to the ground.  Modify the top nosing so that underside is not abrupt.	1  1	3  2	I  I	Up to \$1,500  \$100
<b>Front Entrance</b> Both the porch door and the building entrance door close too fast. The wooden main entrance door also has an operating force of up to 20 lbs.  There is an abrupt change in level surface of 4" at the entry door into the building and therefore is not an accessible route.	404.2.8 404.2.9  404.2.5 403.4	26.9 26.8  26.10 22.4	Adjust door closers such that the closing speeds are at least 6 seconds and the operating force for the wooden entrance door is no more than 15 lbs.  Modify the entry way such that there is no more than a ¼" unbeveled change in level surface and on an accessible route of travel. Options could include an inclined approach (under 5.0% running slope) or a ramped approach (5.1% to 8.3% running slope with railings).	1  1	2  3	I  I	\$0  Up to \$10,000

<p>The entrance door has knob-style hardware and provides only 25½" clear width.</p> <p>See Photo School Admin 7.</p>	404.2	26.11 26.5	<p>Replace the hardware with lever style hardware that can be operated with a closed fist or loose grip. Modify the doors such that there is at least 32" of clear width when one door is in an open position or install an automatic door opener allowing both door panels to open to create the required clear width.</p>	1	3	I	Up to \$5,000+
<p><b><u>Door Hardware</u></b></p> <p>The following interior doors have non-compliant knob style hardware:</p> <p><u>Level 1</u></p> <ul style="list-style-type: none"> <li>• Door front reception to meeting room</li> <li>• Door from meeting room to SPED</li> <li>• Meeting room to kitchenette</li> <li>• Hallway door to SPED (2)</li> <li>• Closet by SPED</li> <li>• Accounts Payable</li> <li>• Copy Room</li> <li>• Hallway closet door</li> <li>• Bathroom</li> </ul> <p><u>Level 2</u></p> <ul style="list-style-type: none"> <li>• Director of Business/Finance</li> <li>• Director of Curriculum</li> <li>• Human Resources</li> <li>• Human Resources closet</li> <li>• Hallway door</li> <li>• Closet be hallway door</li> <li>• Bathroom</li> <li>• Superintendent's Office (2)</li> <li>• Study</li> <li>• Door to Bus/Finance from study</li> <li>• Assistant to Superintendent</li> <li>• Rear hallway door</li> <li>• Pupil Personnel</li> <li>• Technology Assistant</li> </ul> <p>See Photo School Admin 8.</p>	404.2	26.11	<p>Install lever-style or similar accessible compliant hardware on the interior doors.</p> <p><i>Note: Depending on the door and type/quality of hardware, lever hardware may vary from \$75 to \$275 per unit. The estimate provided is at the mid-range (\$150) for the interior doors.</i></p>	2	2	I	Up to \$3,750+
<p><b><u>Door Signage</u></b></p> <p>The following interior doors lack tactile accessible signage:</p> <p><u>Level 1</u></p> <ul style="list-style-type: none"> <li>• Front Reception</li> <li>• Door front reception to meeting room</li> <li>• Door from meeting room to SPED</li> <li>• Meeting room to kitchenette</li> <li>• Hallway to kitchenette</li> <li>• Hallway door to SPED (2)</li> <li>• Closet by SPED</li> <li>• Accounts Payable</li> <li>• Copy Room</li> <li>• Hallway closet door</li> <li>• Transportation Coordinator</li> <li>• Bathroom (on door, no</li> </ul>	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>Accessible bathroom signage must also include the International Symbol of Accessibility.</p>	2, 3	2	I	Up to \$3,500+

<p>Universal Symbol)</p> <p><u>Level 2</u></p> <ul style="list-style-type: none"> <li>• Director of Business/Finance</li> <li>• Director of Curriculum</li> <li>• Human Resources</li> <li>• Human Resources closet</li> <li>• Hallway door</li> <li>• Closet be hallway door</li> <li>• Bathroom</li> <li>• Superintendent's Office (2)</li> <li>• Study</li> <li>• Door to Bus/Finance from study</li> <li>• Assistant to Superintendent</li> <li>• Rear hallway door</li> <li>• Pupil Personnel</li> <li>• Technology Assistant</li> </ul> <p>See Photo School Admin 9.</p>							
<p><b><u>Doorway Widths</u></b></p> <p>The doorways to the following rooms/locations have clear widths that vary from 28" to 30" which do not meet the minimum 32" clear width requirement for a doorway:</p> <p><u>Level 1</u></p> <ul style="list-style-type: none"> <li>• Door front reception to meeting room</li> <li>• Door from meeting room to SPED</li> <li>• Meeting room to kitchenette</li> <li>• Hallway</li> <li>• Hallway to kitchenette</li> <li>• Hallway door to SPED (2)</li> <li>• Accounts Payable</li> <li>• Copy Room</li> <li>• Bathroom</li> </ul> <p><u>Level 2</u></p> <ul style="list-style-type: none"> <li>• Director of Business/Finance</li> <li>• Director of Curriculum</li> <li>• Human Resources</li> <li>• Hallway door</li> <li>• Bathroom</li> <li>• Superintendent's Office (2)</li> <li>• Study</li> <li>• Assistant to Superintendent</li> <li>• Rear hallway door</li> <li>• Pupil Personnel</li> <li>• Technology Assistant</li> <li>• Doorway opening to Supt. Area/Bathroom</li> </ul> <p>See Photo School Admin 10.</p>	404.2	26.5	<p>With the exception of the Level 1 Bathroom, offices are for staff only and not open to the public. Level 1 and Level 2 personnel meet with the public and other visitors in the Level 1 Meeting Room.</p> <p>Seek a variance to retain the existing non-compliant doorway clear widths for the various offices and pass-through doors. Modify office doors only as may be required as a reasonable accommodation request.</p> <p>Once the building is made accessible by reconstructing the ramp, eliminating the abrupt change in level surface at the main entrance, and modifying the front door clear width, the bathroom doorway must also be modified to achieve the minimum required 32" clear width and the hallway door removed.</p>	2, 3	1,3	N	TBD – up to \$2,500 (bathroom only)
<p><b><u>Protruding Objects</u></b></p> <p>Protruding objects are items or fixtures that extend more than 4" into the accessible route of travel between a height of 27" and 80" a.f.f. or have vertical headroom clearance reduced</p>	307.2	20.6.1	Place fixed objects at each end of the fireplace for cane detection.	2	1	I	\$0

<p>to less than 80".</p> <p>The following are protruding objects:</p> <ul style="list-style-type: none"> <li>Level 1 fireplace at 41½" a.f.f. with a protrusion of 14".</li> </ul> <p>See Photo School Admin 11.</p>							
<p><b>Employee Kitchen</b></p> <p>The sink/counter is 36" a.f.f. which is 2" too high and does not provide knee/toe clearance.</p> <p>The towel and soap dispensers are each 52" a.f.f. which are 4" outside the reach range under the 2010 ADA Standards.</p> <p>There is insufficient maneuvering clearing between the sink and cabinet.</p> <p>See Photo School Admin 12.</p>	<p>804.3.2 306.3</p> <p>308.2 308.3</p> <p>304.3 305.3</p>	<p>32.2 32.6 32.7</p> <p>6.5 6.6</p> <p>32.1</p>	<p>Modify the counter and sink so that the counter/sink is no more than 34" a.f.f. and there is a minimum of 27" knee clearance at the sink with guarded, wrapped, or insulated piping.</p> <p>Lower the dispensers to a height of no more than 48" a.f.f.</p> <p>The 36" wide "galley style" kitchen does not allow for a front approach with 60" of maneuvering clearance. To the extent feasible as required through a reasonable accommodation request, modify the kitchen area to allow for better maneuverability. This would also require widening the door openings.</p>	<p>4</p> <p>4</p> <p>4</p>	<p>3</p> <p>2</p> <p>3</p>	<p>L</p> <p>N</p> <p>L</p>	<p>Up to \$2,500</p> <p>\$0</p> <p>TBD</p>
<p><b>Reach Range</b></p> <p>The following exceed the maximum reach range of 48" a.f.f. under the 2010 ADA Standards for adults:</p> <ul style="list-style-type: none"> <li>Coat rack near Level 1 Reception (58" a.f.f.)</li> </ul>	<p>308.2 308.3</p>	<p>6.5 6.6</p>	<p>Provide at least 1 coat hook at a height of 48" a.f.f.</p>	<p>4</p>	<p>2</p>	<p>I</p>	<p>\$10</p>
<p><b>Door Maneuvering Clearance</b></p> <p>The Level 1 hallway door and Level 2 office doors (Supt doors (2), Pupil Personnel, Technology Assistant) have only 5" to 6" of clearance on the pull side of the door.</p>	<p>404.2.4</p>	<p>26.6</p>	<p>There should be a minimum of 18" clearance on the latch pull side of the door for maneuverability. When the first level is made accessible with the ramp and front entrance improvements, the Level 1 hallway door s/b removed to achieve both door pull clearance and doorway clear width. It is assumed that Level 2 will remain as not being on an accessible route of travel with issues addressed as needed through a reasonable accommodation request.</p>	<p>2</p>	<p>2</p>	<p>I</p>	<p>\$0</p>
<p><b>Stairs and Railings</b></p> <p><u>Main Front Stairs to Level 2</u></p> <p>The stairs have 7¼" risers which are ¼" too high. The railings are 29½" to 30" which are not within the acceptable height range of 34" to 38" a.f.f.; are not continuous for the inside railing; lack an outside/wall side railing; and lack top and bottom extensions.</p> <p><u>Stairs to Basement and Attic</u></p> <p>Railings are located only on side of the stairs; there are no top or bottom extensions; the railings are not continuous; and the railings are too low.</p> <p>See Photo School Admin 13.</p>	<p>504 505</p> <p>504 505</p>	<p>27</p> <p>27</p>	<p>Restrict access and limit to employee use only. Seek a historic variance under ADA and 521 CMR to maintain the existing interior historic railings. Install outside wall railings as follows: Railings s/b between 34" – 38" a.f.f. to the top of the railing, circular or oval in x-section, 1½" – 2" in outside diameter, and with extensions at the top (12" parallel to the floor) and bottom as feasible (slope distance one tread then 12" parallel to the floor).</p> <p>As these areas are fully closed to the public and are only for building mechanicals and storage, no further action is required.</p>	<p>2</p> <p>4</p>	<p>3</p> <p>-</p>	<p>N</p> <p>-</p>	<p>Up to \$2,000+</p> <p>\$0</p>



<b>Level 1 Unisex Bathroom</b> The unisex bathroom is wholly non-compliant lacking tactile designation signage and lever hardware (described above); the sink lacks knee clearance; sink faucets require pinching and twisting of the wrist; the coat hook, mirror, soap dispenser, and towel dispenser are all too high; the toilet paper dispenser is too far from the front of the water closet; the water closet is 2" too low; there is insufficient clear width at the side wall, far wall, and front of the water closet; and there are no grab bars.  See Photos School Admin 14, 15, and 16.	306.2 306.3	30.9.3	Relocate or expand the existing bathroom such that the following are provided:  The sink must have a minimum of 27" of knee clearance.	3	3,4	N	TBD – up to \$50,000+
	606.5	30.9.5	The sink piping must be wrapped, guarded, or insulated.				
	309	30.9.6	Provide faucets that can be operable with a closed fist or loose grip.				
	308.2 308.3 603.3	30.11 30.12	Soap and towel dispensers must be no more than 42" a.f.f. and the mirror no more than 40" a.f.f. to the bottom of the reflecting surface.				
	604.4 604.6	30.7.3 30.7.5	Install a water closet that is 17" to 19" a.f.f. to the top of the seat with the flush control on the approach side.				
	609 604.5	30.8	Install 42" long side and rear grab bars such that the top of the gripping surfaces are 33" to 36" a.f.f. The side grab bar s/b no more than 12" from the interior corner and the rear grab bar no more than 6" from the interior corner.				
	604.2 604.3	30.7.2	The water closet must be configured such that it is 18" o.c. from the nearest wall, at least 42" from the farthest wall, and at least 42" in front of the toilet.				
	604.7	30.7.6	Provide a toilet paper dispenser that is a minimum of 7" and a maximum of 9" in front of the water closet measured to the centerline of the dispenser, at least 24" a.f.f., and not located over the grab bars. <i>Note: There also must be a at least 1½" clearance below the gab bar to the nearest object or fixture.</i>				
	See above	See above	As Level 2 is not on an accessible route of travel and not open to the public, no further action is required at the present time. Future modifications or actions, including the relocation of employee office space from Level 2 to Level 1 to access a bathroom, would be dictated by a reasonable accommodation request.	-	-	-	-
<b>Level 2</b> See above narrative on vertical access and Level 2 public use.	-	-	-	-	-	-	\$0 to \$1 million

Exterior, Level 1, and Limited Level 2 Only Total \$106,260+  
Exterior and Level 1, Level 2 Total \$1,106,260+

## School Administration Accessibility Assessment Photos



Photo School Admin 1



Photo School Admin 2



Photo School Admin 3



Photo School Admin 4



Photo School Admin 5



Photo School Admin 6

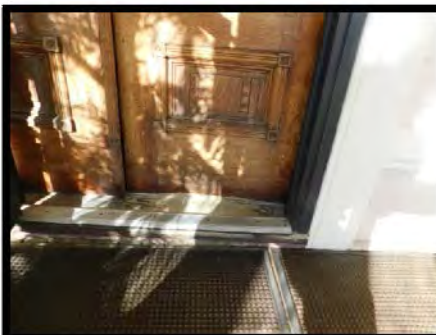


Photo School Admin 7



Photo School Admin 8



Photo School Admin 9



Photo School Admin 10



Photo School Admin 11



Photo School Admin 12



Photo School Admin 13

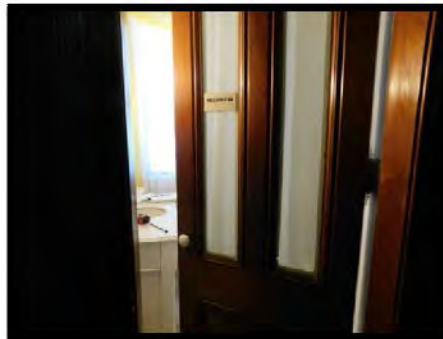


Photo School Admin 14



Photo School Admin 15

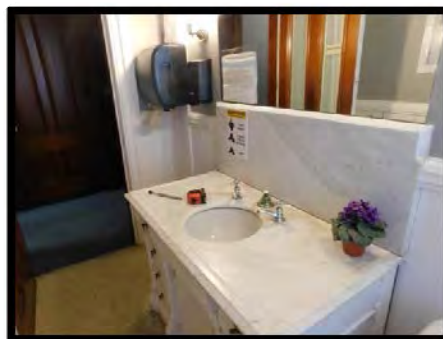


Photo School Admin 16



## **VETERANS HALL BUILDING**

**Description of Facility and Programs:** The Veterans' Hall Building is a 2-story wooden frame structure with a basement and attic. The building used to house the Veteran Services Office on the first floor (relocated to the Town Hall Annex) and serves as a meeting space for the Alfred E. Seagrave, Chapter 116 DAV and the Blackstone Valley Veterans Association on the second floor.



**Responsible Party:** Board of Selectmen

### **General Description or Obstacle Which Limits Mobility or Access:**

#### Exterior

The designated accessible parking space lacks signage. The side entry has stairs that lack railings and the door has knob style hardware. The front main entrance stairs have open risers; a top stair tread has a 1" abrupt nosing; and the stair railings are too wide, not round or oval in shape, and lack bottom extensions.

There are abrupt changes in level surface at the base of the ramp of 1" at both the concrete and asphalt and at the ramp decking. The top and bottom railings do not fall within the required ranges of 18" to 20" a.f.f. (bottom railing) and 34" to 38" a.f.f. (top railing).

#### Level 1

Four interior doors lack tactile designation signage. A sink is 1½" too high and lacks knee clearance. A bathroom is wholly non-compliant as there is a ¾" abrupt change in level surface at the entrance; the sink lacks knee clearance; the towel dispensers (2) are too high; the toilet paper dispenser is too low and too close to the front of the water closet; and has only one non-compliant grab bar.

## Level 2

There is no accessible route of travel (lift, elevator) to the second level. The stairs to the side door have railings on one side only, have no bottom extensions, are not round or oval in shape, and are 5" too low. The stairs to Level 2 have railings that lack top and bottom extensions, are 6" too low, and are not continuous.

The second level has 5 doors that have knob-style hardware and lack tactile designation signage. The sink is 1½" too high and lacks knee clearance. A microwave and toaster oven/stove are not within reach range.

The bathroom is wholly non-compliant. A light switch outside the bathroom is on a pull chain and is 26" too high. There is only 27" of clear width into the bathroom and to the water closet. A shower lacks accessible clear width and has a 4" abrupt change in level surface to enter. The sink lacks knee clearance. Both the mirror and towel dispenser are too high. The water closet lacks grab bars. There is no compliant clear width on the far and front side of the water closet. The toilet paper dispenser is too close to the front of the water closet. The "eye hook" to lock the door is non-compliant and is 16" outside of reach.

Level 2 is closed to the general public and is used solely by the Alfred E. Seagrave, Chapter 116 DAV and the Blackstone Valley Veterans Association for storage of items and meetings. If there is a need for a reasonable accommodation for a scheduled meeting, then the meeting can be relocated to the First Level.

At a minimum, vertical access and related modifications may be necessitated through a change in use and public access to the second level. If the current use remains in place with no general public access, required modifications would be limited to door hardware and tactile designation signage. If public business is conducted on the second floor or activities and programs offered then vertical access will be required as well as modifications to address identified areas of non-compliance. Architect and/or engineering services will be required to develop design plans and specifications for Level 2 access. Depending on Level 2 costs, inclusive of required structural and electrical upgrades, 100% accessible compliance could be required under MA 521 CMR as well as other mandated State Building Code requirements. As a result, total costs could easily approach \$500,000 to \$1,000,000+.

## Attic

Access to the attic is also limited to stairs. The stairs lack railings and the door to the stairs has non-compliant hardware and lacks signage. This area is unused or used solely for storage with no public access. With the exception of tactile designation signage, no other action is required at the present time.

## Veterans' Hall 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>
<b><u>Parking</u></b> The designated accessible parking lacks signage.	502 703.7.2	23	Provide accessible signage. Signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR).	1	2	I	\$100
<b><u>Front Stairs</u></b> The side stairs lack railings.  The front stairs have open risers; have a 1" abrupt nosing at the top tread; and railings that are too wide, not round or oval in shape, and lack bottom extensions,  See Photo Veterans 1.	504 505	27	Install complaint railings on the stairs that are round or oval in x-section and 1¼" – 2" in outside diameter. Railings should be at a height of 34" to 38" a.f.f. to the top of the handrails. Provide 12" extensions the slope distance of one tread then 12" at the bottom of the stairs and 12" parallel to the floor at the top of the stairs.  Install risers on the front stairs.	1	3	N	Up to \$3,000
<b><u>Ramp to Front Entrance</u></b> There are two 1" abrupt changes in level surface from the transition of concrete and asphalt and concrete and Trex ramp.  The lower railing is up to 1½" too high. Segments of the upper railing are up to ½" too low.  See Photo Veterans 2.	403.4  505.4	22.4.1  24.5	Modify the transition to eliminate the abrupt change in level surface. The transition s/b no greater than ¼" or ¼" to ½" if beveled with a slope of no greater than 1:2.  Modify/adjust/replace the lower railings so they are 18" to 20" a.f.f. to the top of the railings and the upper railings are 34" to 38" a.f.f. to the top of the railings.	1  1	2  3	N  N	\$150  Up to \$5,000+
<b><u>Door Signage</u></b> Tactile designation signage is not provided on four (4) Level 1 interior doors and five (5) Level 2 interior doors.  See Photo Veterans 3.	703	41.1	Install accessible compliant signage on the latch side of each door with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Under 521 CMR, signage s/b 60" a.f.f. to the centerline of the sign. Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	2	2	I	Up to \$1,125
<b><u>Door Hardware</u></b> Five (5) Level 2 interior doors have non-compliant knob style hardware.  See Photo Veterans 4.	404.2	26.11	Install lever-style or similar accessible compliant hardware on the five (5) Level 2 interior doors.  <i>Note: Depending on the door and type/quality of hardware, lever hardware may vary from \$75 to \$275 per unit. The estimate provided is at the mid range for these doors.</i>	2	2	N	Up to \$625
<b><u>Level 1 Sink</u></b> The sink/counter is 1½" too high and lacks knee clearance.  See Photo Veterans 5.	606 306	32.7	Modify the counter and sink so that it is no more than 34" a.f.f. and there is a minimum of 27" knee clearance at the sink with guarded, wrapped, or insulated piping.	4	3	L	Up to \$1,500+

<b>Level 1 Bathroom</b>							
There is a ¼" unbeveled threshold at the bathroom entrance.	404.2.5	26.10	Modify the threshold so that it is no greater than ½" with a 1:2 bevel.	3	2	I	\$100
The toilet paper dispenser is 4" too close to the water closet.	604.7	30.7.6	Relocate/install the toilet paper dispenser so it is a minimum of 7" and a maximum of 9" in front of the water closet measured to the centerline of the dispenser and at least 24" a.f.f. <i>Note: There also must be a at least 1½" clearance below the grab bar to the nearest object or fixture.</i>	3	2	I	\$0
The towel dispensers (2) are 10" to 16" too high.	308.2 308.3	30.12	Lower at least one dispenser to no more than 42" a.f.f.	3	2	I	\$0
The sink piping is not wrapped, guarded, or insulated.	606.5	30.9.5	Wrap, guard, or insulate the piping.	3	2	I	\$75
The water closets lack compliant grab bars.  See Photo Veterans 6.	609 604	30.8	Install 42" long side and rear grab bars that are circular in x-section with a diameter of no more than 1½". The grab bars s/b 33" to 36" a.f.f. to the top of the gripping surface. The rear grab bar s/b no more than 6" from the interior corner and the side grab bar no more than 12" from the interior corner.	3	2	I	\$300
<b>Level 2</b>							
See above narrative on vertical access and Level 2 public use.	-	-	-	-	-	-	\$0 to \$1 million

Exterior and Level 1 Only Total \$11,975+  
Exterior and Level 1, Level 2 Total \$1,011,975+

**Veterans Home Building Accessibility Assessment Photos**



Photo Veterans 1



Photo Veterans 2

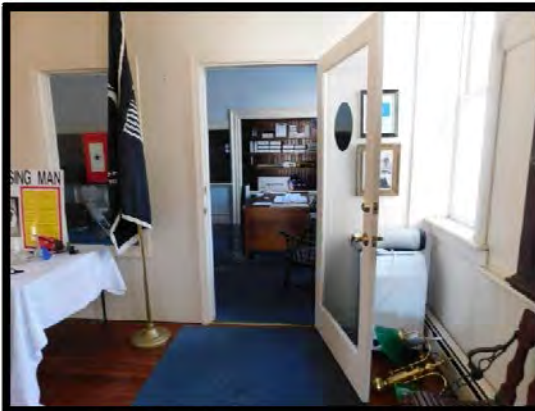


Photo Veterans 3

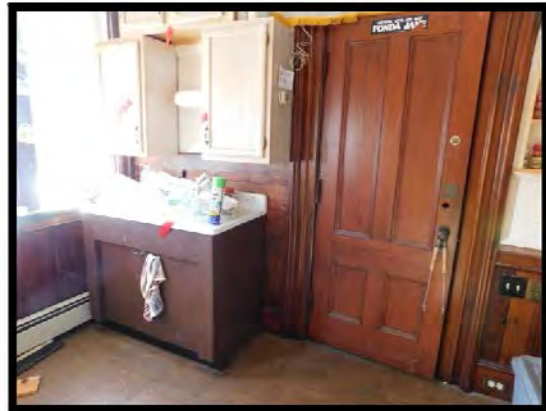


Photo Veterans 4

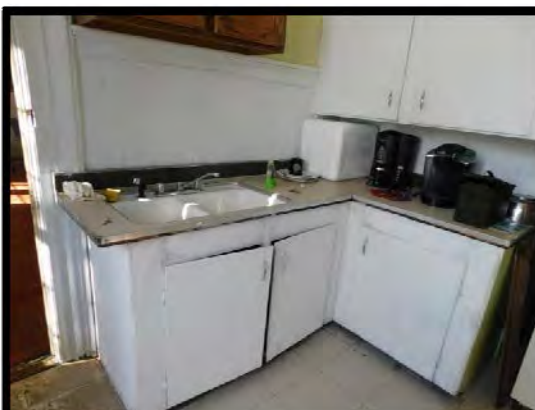


Photo Veterans 5

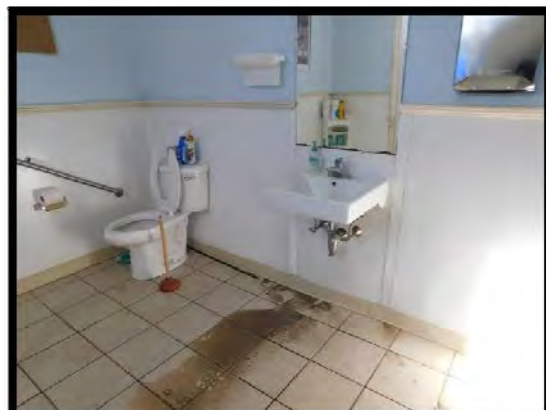


Photo Veterans 6



## **FORMER NORTHBRIDGE ELEMENTARY SCHOOL**

**Function and Description of Facility and Programs:** The former Northbridge Elementary School building is no longer in service as a school and is being considered for re-use. The building is a multi-level masonry structure totally roughly 49,000 sf. It was built in 1952 with an addition constructed in 1983. The future use of this building is undetermined and therefore only a cursory assessment of general non-compliance is provided.



**Responsible Party:** Board of Selectmen, School Committee

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

### **Parking**

There are on-site designated accessible parking spaces with only 3 on-street designated accessible parking spaces. These parallel spaces lack access aisles and no space is designated as van accessible.

### **Exterior and Interior Doors**

Exterior and interior doors with closers exceed the maximum allowed operating force and do not meet the minimum required closing speed. Some doors have non-compliant knob-style hardware, have glass

panes that are too high and lack tactile signage. The Lower Level/Basement bathrooms non-tactile signage is located on the door and also lacks the universal symbol of accessibility. Some doors, including hallway double doors, lack the minimum required 32" clear width. Some doors also lack the minimum required 18" clear width on the latch side of the door. [See Photos NES 1, 2 and 3.](#)

#### Interior Ramp

The wall side top railing of the interior ramp to the lower level bathrooms, classrooms, and library is ½" to 1" too low. Top ramp railings should be between 34" to 38" a.f.f. to the top of the gripping surface.

#### Drinking Fountains

Drinking fountains on the Lower/Basement Level (1), Main Level (2), Level 1 (1), and Level 2 (1) are "low" only. Three of the drinking fountains do not have the minimum required 27" knee clearance for a "low" drinking fountain with the clearance ranging from 21" to 23" a.f.f. The drinking fountain in the Gym is considered to be a "high" only drinking fountain with a spout height of 38" a.f.f. with no knee clearance and only allowing a parallel approach. [See Photos NES 4 and 5.](#)

#### Protruding Objects

Hallway electrical panels and hallway shelving serve as protruding objects resulting in an impediment to the visually impaired. Items that protrude more than 4" into the accessible route of travel at a height of 27" a.f.f. to 80" a.f.f. are considered to be non-compliant protruding objects.

#### Controls and Switches

Some light switches exceed the maximum 48" reach range under the 2010 ADA Standards.

#### Classrooms

Classrooms have sinks/counters that are only 24" high, lack knee clearance, have bubblers that are too far from the front edge, and have faucets that require pinching and twisting of the wrist. Classroom storage cabinets have doors with hardware that requires pinching and twisting of the wrist. [See Photos NES 6 and 7.](#)

#### Assembly Room Stage

There is no accessible route of travel to the stage from the assembly area and the stairs lack railings.

#### Interior Stairs

Stairs have railings that are not continuous (inside railing), are 2" to 6" too low, and lack extensions at the top and bottom. [See Photos NES 8 and 9.](#)

#### Bathrooms

All of the bathrooms have varying levels of non-compliance including the lack of audible and visual alarms; sink piping that is not wrapped or insulated; sink faucets that require pinching and twisting of the wrist; dispensers, mirrors, and coat hooks that exceed the maximum reach range; toilet paper dispensers that are too low and too far or close to the front of the water closet; insufficient clear widths and maneuverability at water closets and at some urinals; the lack of grab bars and/or grab bars that are not long enough; grab bars that are mounted at the incorrect height; water closets that are too low and have flush controls on the wrong side; and stall doors that are not self-closing, open in and not out, and lack pull devices on both sides of the doors. [See Photos NES 10, 11, and 12.](#)

### Access to Levels 2 and 3.

There is no accessible route of travel to Levels 2 and 3. A multi-stop elevator, either internally or as an addition to the existing building, would be required to result in full access to all building levels. Under most construction options additional compliance requirements would be triggered and in the case of the elevator, full code compliance under 521 CMR due to the cost of the renovations vs. the value of the building. Vertical access modifications may also trigger additional structural, electrical, mechanical, fire alarm and possibly plumbing alterations and modifications depending on location and what is required. An electrical upgrade would also be in order to accommodate the powering of the equipment. Accounting for unforeseen costs (15% contingency), demolition, finishes, general conditions including overhead and profit (20%), architect oversight, compliance with prevailing wage, and historic rehabilitation considerations (if applicable), total probable construction costs would range between \$1 - \$2 million and possibly more. The project architect would also need to consult with both the Massachusetts State Historic Preservation Officer as well as the Massachusetts Architectural Access Board to determine what exemptions may be considered and then file the formal variance request as may be required.

### **Former Northbridge Elementary School Building Assessment Photos**

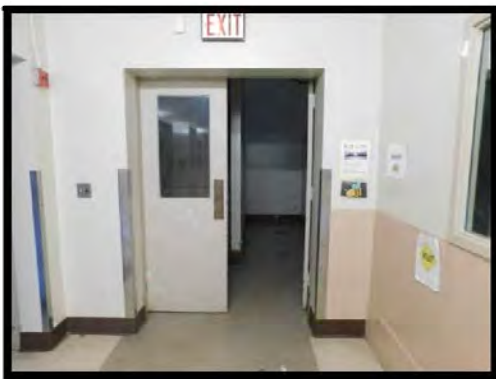


Photo NES 1

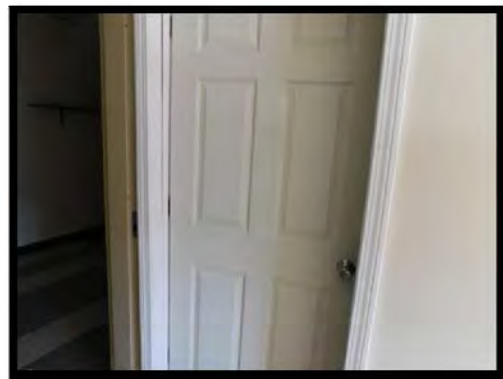


Photo NES 2



Photo NES 3

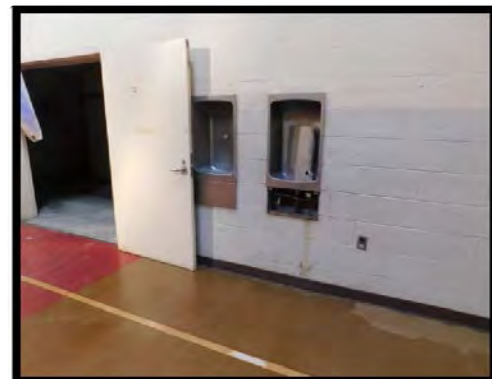


Photo NES 4



Photo NES 5



Photo NES 6



Photo NES 7

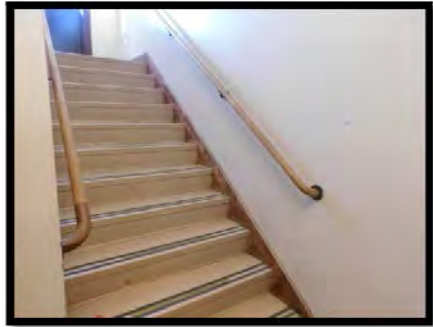


Photo NES 8



Photo NES 9



Photo NES 10



Photo NES 11



Photo NES 12



## **NORTHBRIDGE ELEMENTARY SCHOOL**

**Description of Facility:** Northbridge Elementary School is a three-story masonry and steel structure housing approximately 1,030 students from Pre-K to Grade 5. The school was substantially completed in 2021 with “punch list” and remaining unfinished items to be completed in the Spring of 2022.



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

	<u>2010 ADA Standards</u>	<u>521 CMR Standards</u>
Pre-k only Classrooms	Ages 3 – 4	Pre-k
K only Classrooms	Ages 5 – 8	K - 3
1 – 3 Classrooms	Ages 5 – 8	K - 3
4 – 5 Classrooms	Ages 9 – 12	4 - 6
Common Areas	Ages 5 – 8	K - 3
	Ages 9 – 12	4 - 6
Adult Only Areas	Adult	Adult

## **General Description or Obstacle Which Limits Mobility or Access:**

### Designated Accessible Parking

Two of the designated accessible parking spaces in front of the building, the two parking spaces at the front ball field, and the two parking spaces near the rear field have signage that is 7" to 15½" too high. One of the front ball field spaces has a running slope of 2.4% to 2.8%.

### Accessible Routes of Travel

A number of the sidewalks from the parking lots lack curb ramps. The asphalt walkway behind the front baseball field (home plate area) has a segment of roughly 3 to 5 feet with a running slope of up to 5.7%. The walkway at the side playground and basketball court has 2 locations where the walkway crosses a travel lane resulting in abrupt changes in level surface (granite curbing) of ½" to 2". A curb ramp at the side front parking has a running slope of 9.1% which exceeds the maximum allowed of 8.3%. Access gates into playing fields and recreational areas are not smooth on the push side of the gates.

### EV Charging Stations

The payment slot is 5" too high and the control buttons are 8" too high under the 2010 ADA Standards. Additional guidance on EV Charging Stations is provided in Chapter VI of this Plan.

### Interior Common Areas and General

Interior and exterior doors with closers have operating forces and closing speeds which exceed that allowed. Some doors lack tactile designation signage with one having a notice placed over the signage obstructing the Braille. The ramp to the stage has a segment that slightly exceeds the maximum running slope of 8.3%. Due to the limited segment and cost to bring into compliance, a variance to retain the existing ramp and slope is recommended. Designated accessible hallway lockers are difficult to open with a closed fist or loose grip. A Level 3 hallway counter serves as a protruding object. Most classroom accessible sinks have items stored in the knee clearance area under the sink restricting wheelchair use. All items should be removed from beneath the accessible sinks.

### Pre-k Classrooms (Level 1)

Some of the classrooms have unsecured rugs, which serve as a tripping hazard. Both the soap and towel dispensers are up to 11½" too high. The classroom sinks do not appear to fully adhere to the 2010 ADA Standards and 521 CMR pertaining to knee clearance and drinking fountain location, operating force, and water flow height and location. See *"Classroom Sinks and Classroom Sinks with Bubblers"* commentary on the next page.

The Pre-k bathrooms have metered sink faucets with excessive operating forces and which do not stay open for at least 10 seconds. The toilet paper dispensers are up to 14" too high and are located over the grab bars. The mirror in the Classroom Bathroom #1229 is 1" too high. The side grab bars are too far from the interior corner and the rear grab bars are 6" too short. Some of the water closets have restricted side and front clear widths due to stored items in the bathroom.

### Kindergarten – Grade 2 Classrooms (Levels 1 and 2)

Most of the classrooms have unsecured rugs, which serve as a tripping hazard. The soap dispensers are up to 6½" too high. The classroom sinks do not appear to fully adhere to the 2010 ADA Standards and 521 CMR pertaining to knee clearance and drinking fountain location, operating force, and water flow height and location. See *"Classroom Sinks and Classroom Sinks with Bubblers"* commentary on the next page.

The Kindergarten bathrooms have metered sink faucets with excessive operating forces and which do not stay open for at least 10 seconds. Some of the sinks are up to 1" too high. Some of the mirrors over the sinks are 1" too high. The toilet paper dispensers are up to 19" too high and are located over the grab bars. The side grab bars are too far from the interior corner and the rear grab bars are 6" too short. The water closet in Classroom Bathroom #1247 is 1" too high.

#### Grades 3 - 5 Classrooms (Level 3)

Classrooms have unsecured rugs, which serve as a tripping hazard. Classrooms #2109 and #2106 have sinks which have piping that is not wrapped or insulated and obstructed knee clearance.

#### Level 1 – 3 Adult Bathrooms

The adult bathrooms have a few areas of minor non-compliance including coat hooks and dispensers that are too high and metered sink faucets with excessive operating forces and which do not stay open for at least 10 seconds.

#### Level 1 Hallway Student, SPED, and Nurse Bathrooms

Hallway. Bathrooms that have removed the wall mounted stainless steel waste baskets and replaced with square plastic waste bins have reduced clear width at the entrance. Metered sink faucets have excessive operating forces and do not stay open for at least 10 seconds. Stall doors open in and not out, some stall doors lack exterior pull devices, and the coat hooks are too high. The side grab bars are too far from the interior corners. In addition, the toilet paper dispensers are too high. It appears that a mix of standards for Grades 4 – 6 and Adult Standards were applied to the Boy's and Girl's Bathrooms near the Cafeteria and near the Media Center as it pertains to the water closets, grab bars, and toilet paper dispensers.

Nurse's Office. The metered sink faucet has an excessive operating force and does not stay open for at least 10 seconds. The side grab bar is too far from the interior corner. The rear grab bar is 6" too short. The toilet paper dispenser is too high and is located over the grab bars. The coat hook is too high. The water closet is ½" too high for K-3 students but within range for Grades 4 – 6 students. However, the grab bars are too low for Grades 4 – 6 students but within range for K-3 students.

SPED Bathroom. The metered sink faucet has an excessive operating force. The coat hook is too high. The side grab bar is too far from the interior corner. The rear grab bar is 6" too short. The toilet paper dispenser is too high and is located over the grab bars. The water closet is ¼" too high for K-3 students but within range for Grades 4 – 6 students. However, the grab bars are too low for Grades 4 – 6 students but within range for K-3 students.

#### Level 2 Hallway Student Bathrooms and Bathroom Near #2227

Hallway. Bathrooms that have removed the wall mounted stainless steel waste baskets and replaced with square plastic waste bins have reduced clear width at the entrance. Metered sink faucets have excessive operating forces and do not stay open for at least 10 seconds. Stall doors open in and not out and the coat hooks are too high. The side grab bars are too far from the interior corners. In addition, the toilet paper dispensers are too high and are located over the grab bars. If the standards for Grades K – 3 are applied, the water closets heights and setbacks are generally met with a few exceptions.

Bathroom Near #2227. The metered sink faucet has an excessive operating force and does not stay open for at least 10 seconds. The side grab bar is too far from the interior corner. The toilet paper dispenser is too high and is located over the grab bars. The water closet is ½" too high for K-3.

#### Level 3 Hallway Student Bathrooms and Bathroom in #3226

Hallway. Bathrooms that have removed the wall mounted stainless steel waste baskets and replaced with square plastic waste bins have reduced clear width at the entrance. Metered sink faucets have excessive operating forces and do not stay open for at least 10 seconds. Stall doors open in and not out and the coat hooks are too high. The side grab bars are too far from the interior corners. In addition, the toilet paper dispensers are too high and are located over the grab bars. If the standards for Grades 4 – 6 are applied, the water closets heights and setbacks are generally met with one exception (Boy's Bathroom near Stair #1). The grab bars are 1" too low.

Bathroom in #3226. The side grab bar is too far from the interior corner. The toilet paper dispenser is too high and is located over the grab bars.

#### Levels 1 – 3 Alternative Accessible Stalls

The hallway bathrooms near the elevator also have Alternative Accessible Stalls. In general, the coat hooks are too high and the Level 2 and 3 toilet paper dispensers are located over the grab bars. The Level 1 grab bars are at adult heights and should be lowered to accommodate students.

#### Level 1 Kitchen Area

The kitchen area itself has numerous elements of non-compliance (reach ranges, knee clearances, clear widths, etc.) but most of the activities undertaken require personnel who must meet certain physical requirements to meet the essential functions of their job. No further action is required at the present time unless dictated by a request for a reasonable accommodation.

#### **Classroom Sinks and Classroom Sinks with Bubblers**

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

#### 2010 ADA Standards

The 2010 ADA Standards addresses this as follows:

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

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



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

#### 521 Code of Massachusetts Regulations

The 521 Code of Massachusetts Regulations addresses this as follows:

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

#### Assessment and Comment

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

Based on an assessment of the Pre-k and Kindergarten classrooms, it does not appear that the

classroom sinks and bubblers are in full compliance. Knee height clearances and sink/counter heights would meet the 2010 ADA Standards, but the knee height clearances would be up to 2¾" too low under the 521 CMR Standards (Note: The knee height clearances are also ½" to ¾" too low for bathroom sinks under 521 CMR). The spout locations are roughly 7" from the outside edge with water flows more than 3" from the outside edge, both which exceed that allowed under the 2010 ADA Standards and 521 CMR. The bubbler controls exceed 5 lbs. of operating force.

For Pre-k and Kindergarten children, lower sinks and lower knee height clearances would seem more appropriate. Drinking fountain spouts should be adjusted and re-aligned to meet the front edge and water flow requirements and the controls adjusted to require no more than 5 lbs. to operate. Consultation with the Massachusetts Office on Disability and the Massachusetts Architectural Access Board should be considered to retain the existing sink knee height clearances to accommodate younger children.

### **Northbridge Elementary School Accessibility Assessment**

<b>General Description of Obstacle</b>	<b><u>2010 ADAAG</u></b>	<b><u>MAAB 521 CMR</u></b>	<b><u>Type of Action to be Taken</u></b>	<b><u>P</u></b>	<b><u>F</u></b>	<b><u>TF</u></b>	<b><u>Cost Estimate</u></b>
<b><u>Parking</u></b>							
Two of the designated accessible parking spaces in front of the building, the two parking spaces at the front ball field, and the two parking spaces near the rear field have signage that is 7" to 15½" too high.	502.6	23.6	Signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located no more than 10' in front of the space.	1	2	I	\$0
One of the front ball field spaces has a running slope of 2.4% to 2.8%.	502.4	23.4	Modify the front ball field parking spaces such that the running and cross slopes do not exceed 2.0%.	1	3	N	Up to \$1,500+
<b><u>Exterior Accessible Routes</u></b>							
A number of the sidewalks from the parking lots lack curb ramps.	405 406 705	21	Provide curb ramps as required. Curb ramps should have detectable warning strips, running slopes of no more than 8.3%, flared slopes of not more than 10.0%, and a top level landing (no more than 2.0% in any direction).	1	3	I	Up to \$7,500+
The asphalt walkway behind the front baseball field (home plate area) has a segment of roughly 3 to 5 feet with a running slope of up to 5.7%.	403	22	Modify/reconstruct the walkway such that the running slopes do not exceed 5.0%.	2	3	N	Up to \$500
The walkway at the side playground and basketball court has 2 locations where the walkway crosses a travel lane resulting in abrupt changes in level surface (granite curbing) of ½" to 2".	403.4	22.4.1	Modify the asphalt and/or grind the granite such that there is no more than a ¼" abrupt change in level surface or a ¼" to a ½" change in level surface with no more than a 1:2 slope.	2	3	N	Up to \$500
A curb ramp at the side front parking has a running slope of 9.1% which exceeds the maximum allowed of 8.3%.	405.2	21.3	Modify the curb ramp such that the running slope does not exceed 8.3%	1	3	N	Up to \$1,500

At least 8 access gates on the accessible routes of travel into the playing fields and recreational areas do not comply with the 2010 ADA Standards for a smooth surface within 10 inches of the ground on the push side for the full width of the gate.  See Photos NES 1, 2, 3, 4, and 5.	404.2.10	NA	Remove gates or install smooth plating at base of gates.	1	2	N	Up to \$1,200
<b>EV Charging Stations</b> The payment slot is 5" too high and the control buttons are 8" too high under the 2010 ADA Standards.	308.2 308.3	6.5 6.6	Replace and/or modify the EV Charger device such that all required operations are within the maximum reach range of 48" a.f.f.	2	3	N	TBD
<b>Exterior and Interior Doors</b> Exterior and interior doors with closers (including bathrooms) do not fully comply with the maximum allowed operating force for an exterior door (15 lbs.), interior door (5 lbs.) and minimum closing speed requirement of 6 seconds under 521 CMR. Assessments ranged from 3 to 4 seconds closing speed and up to 25 lbs. operating force.	404.2.8 404.2.9	26.8 26.9	Adjust door closers such that the push/pull force does not exceed 15 lbs for an exterior door and 5 lbs. for an interior door with door closing speeds of at least 6 seconds.	1, 3	2	I	\$0
<b>Door Signage</b> Tactile designation signage is not provided at the following locations:  <u>Level 1</u> <ul style="list-style-type: none"> <li>Storage (double doors) near stairs/cafeteria</li> <li>Door to bathrooms near stairs/cafeteria</li> <li>Storage closet next to Room #1263</li> <li>Breakout Room next to Room #1235</li> <li>Doors to cafeteria</li> <li>Gymnasium hallway exit</li> <li>Gymnasium hallway to cafeteria</li> <li>Gymnasium egress door</li> </ul> <p>In addition, the tactile designation signage at Room #1110 is blocked with paper and Classrooms #1242 and #1239 pass-through door signage is not on the latch side of the doors.</p> <u>Level 2</u> <ul style="list-style-type: none"> <li>Room w/sink next to #2110</li> <li>Emergency eyewash/ janitor's closet</li> <li>Mechanical room next to emergency eyewash</li> <li>Mechanical room in #2244</li> <li>#2109 closet</li> </ul> <u>Level 3</u> <ul style="list-style-type: none"> <li>Mechanical room across from #3220</li> </ul>	703	41.1	Install, replace, and/or relocate accessible compliant designation signage on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Under 521 CMR, signage s/b 60" a.f.f. to the centerline of the sign. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).  Remove items/paper that is blocking the signage.	2	2	I	\$2,000

<ul style="list-style-type: none"> <li>Three mechanical/storage rooms across from #3225</li> </ul> <p>See Photo NES 6.</p>							
<b>Accessible Hallway Lockers</b> The designated accessible hallway lockers have operating mechanisms that are difficult to use with a loose grip or closed fist.  <p>See Photo NES 7.</p>	225.2.1 811.4 309	26.11 19.4.1	Modify the operating mechanisms to provide an extension to allow for easier use and operation with a closed fist.	4	3	I	Up to \$300
<b>Protruding Objects</b> <ul style="list-style-type: none"> <li>Collaboration Room #3225 TV monitor (6½" protrusion at 38½" a.f.f)</li> <li>Hallway counter between #3104 and #3106 (18" protrusion at 32½" a.f.f)</li> </ul> Protruding objects extend more than 4" into the accessible route of travel between a height of 27" and 80" a.f.f. or have vertical headroom clearance reduced to less than 80".  <p>See Photo NES 8.</p>	307.2	20.6.1	Place fixed objects at each end of the TV monitor and hallway counter for cane detection.	2	2	I	\$0
<b>Unsecured Rugs</b> Classrooms have rugs/carpet that are not fully secured and serve as a tripping hazard	302.2	29.3	Remove or secure the rugs/carpet.	4	2	I	\$0
<b>Classroom Sinks</b> <u>Pre-K (#1216, #1219, #1223, #1226, #1229)</u> Knee clearance varies from 24¼" to 24½" a.f.f., which is less than the required 27" a.f.f. under 521 CMR for classroom sinks.  Drinking fountain operating controls require 8 to 10 lbs of operating force.  Spouts are located 7" from the front edge and with the water flow greater than 3" from the front edge.  Towel dispensers are 2" too high and soap dispensers are 10" to 11½" too high.  <u>Kindergarten Sinks (#1235, #1260, #1239, #1242, #1257, #1255, #1247, #1250, #1252)</u> Knee clearance varies from 24¼" to 24½" a.f.f., which is less than the required 27" a.f.f. under 521 CMR for classroom sinks.  Drinking fountain operating controls require 7 to 8 lbs of operating force.	306 606.2  309.4  602.5  308.1  306 606.2  309.4	12.4  36.5  36.3  6.5 6.6  12.4  36.5	Seek a variance to allow for a lower knee clearance height for Pre-k (Ages 3 – 4) students.  Modify the spout controls such that it takes no more than 5 lbs. of force to operate.  Spouts s/b located no more than 5" from the front edge under the 2010 ADA Standards with a water flow within 3" of the front edge under 521 CMR. As feasible, modify and/or adjust the spouts to comply with the 2010 ADA Standards and 521 CMR.  Lower the dispensers to a height of no more than 36" a.f.f. (Pre-k reach range).  Seek a variance to allow for a lower knee clearance height for Pre-k (Ages 3 – 4) students.  Modify the spout controls such that it takes no more than 5 lbs. of force to operate.	2  2  2  2  2	1  2  3  2  1  2	I  I  I  I  I	\$0  \$0  TBD  \$0  \$0

Spouts are located 7" from the front edge and with the water flow greater than 3" from the front edge.	602.5	36.3	Spouts s/b located no more than 5" from the front edge under the 2010 ADA Standards with a water flow within 3" of the front edge under 521 CMR. As feasible, modify and/or adjust the spouts to comply with the 2010 ADA Standards and 521 CMR.	2	3	I	TBD
Soap dispensers are 6" to 6½" too high.	308.1	6.5 6.6	Lower the dispensers to a height of no more than 40" a.f.f. (K-3 reach range).	2	2	I	\$0
<u>Other Sinks (#2227, #2220, #2109, #2106, #3226, #3219)</u> The soap dispensers are 2" to high in Room #'s 2227, 2220, 3226, and 3219.	308.1	6.5 6.6	Lower the dispensers to a height of no more than 44" a.f.f. (Grade 4 – 6 reach range).	2	2	I	\$0
The drinking fountain operating controls require 7 to 8 lbs of operating force and the spouts are located 7" from the front edge and with the water flow greater than 3" from the front edge in Room #'s 2227, 2220, 3226, and 3219.	309.4	36.5	Modify the spout controls such that it takes no more than 5 lbs. of force to operate.	2	2	I	\$0
	602.5	36.3	Spouts s/b located no more than 5" from the front edge under the 2010 ADA Standards with a water flow within 3" of the front edge under 521 CMR. As feasible, modify and/or adjust the spouts to comply with the 2010 ADA Standards and 521 CMR.	2	3	I	TBD
The sink piping is not wrapped in the "accessible sinks" in Rooms #'s 2109 and 2106. The accessible sink in Room #2106 has obstructed knee clearance due to a curtain obstructing the knee clearance.	606.5 606.2	32.7.4 32.7.1	Wrap or insulate the piping and remove the curtain on the sink in Room #2106.	2	2	I	\$150
See Photos NES 9 and 10.							
<b><u>Adult Bathrooms</u></b>							
<u>Coat Hooks</u> The coat hooks at the following locations are 5½" to 6" too high:	308.2 308.3	30.6.1	Lower the coat hooks to a height of no more than 48" a.f.f.	3	2	I	\$0
<ul style="list-style-type: none"> <li>• Level 1 Admin</li> <li>• Level 1 across Media Center</li> <li>• Level 1 across Stairs #5</li> <li>• Level 1 Unisex near Cafeteria (2)</li> <li>• Level 1 near kitchen</li> <li>• Level 2 near Stairs #1 (2 bathrooms)</li> <li>• Level 2 Sink Room opposite #2113</li> <li>• Level 2 across Elevator</li> <li>• Level 2 across Stairs</li> <li>• Level 3 near Stairs #1 (2 bathrooms)</li> <li>• Level 3 across Stairs #5</li> <li>• Level 3 across Elevator</li> </ul>							
<u>Sink Faucets</u> The sink faucets at the following locations have faucets with operating forces between 6 and 10 lbs:	606.4 309.4	30.9.6 39.5	Adjust the faucets so they require no more than 5 lbs. to operate.	3	2	I	\$0
<ul style="list-style-type: none"> <li>• Level 1 across Media Center</li> <li>• Level 1 across Stairs #5</li> <li>• Level 1 Unisex near Cafeteria (2)</li> <li>• Level 1 near kitchen</li> <li>• Level 2 near Stairs #1 (2</li> </ul>							

bathrooms) <ul style="list-style-type: none"> <li>• Level 2 across Elevator</li> <li>• Level 2 across Stairs</li> <li>• Level 3 across Elevator</li> </ul>							
The sink faucets at the following locations have faucets that stay on for only 3 to 8 seconds: <ul style="list-style-type: none"> <li>• Level 1 Admin</li> <li>• Level 1 across Media Center</li> <li>• Level 1 across Stairs #5</li> <li>• Level 2 near Stairs #1 (2 bathrooms)</li> <li>• Level 2 across Elevator</li> <li>• Level 2 across Stairs</li> <li>• Level 3 across Elevator</li> </ul>	606.4	30.9.6	Adjust the faucets so the self-closing valves stay open for a minimum of 10 seconds.	3	2	I	\$0
<u>Towel Dispenser</u> The towel dispensers the Level 2 bathroom across from the stairs and the Level 3 bathroom across from the Stairs #5 are 3" to 4" too high.	308	30.12	Lower the dispensers to a height of no more than 42" a.f.f.	3	2	I	\$0
<u>Protruding Objects</u> The Level 3 bathroom across from the elevator paper towel dispenser has a 7" protrusion at a height of 42" a.f.f. <i>Note: Protruding objects extend more than 4" into the accessible route of travel between a height of 27" and 80" a.f.f. or have vertical clearance reduced to less than 80".</i>	307.2	20.6.1	Relocate the dispenser or place a fixed object under the towel dispenser for cane detection.	3	2	I	\$0
<b>Pre-K Classroom Bathrooms</b>							
<u>Sink Faucets</u> Classroom bathrooms #1229, 1226, 1223, 1219, and 1216 have sinks with metered faucets that have operating forces of 8 to 10 lbs.	606.4 309.4	30.9.6 39.5	Adjust the faucets so they require no more than 5 lbs. to operate.	3	2	I	\$0
Classroom bathrooms #1229, 1223, 1219, and 1216 have sinks with metered faucets that stay open for only 5 to 8 seconds.	606.4	30.9.6	Adjust the faucets so the self-closing valves stay open for a minimum of 10 seconds.	3	2	I	\$0
<u>Toilet Paper Dispensers</u> Classroom bathrooms #1229, 1226, 1223, 1219, and 1216 have toilet paper dispensers that are 13½" to 14" too high and located over the grab bars.	604.9.6	30.14.5	Relocate the dispensers so that they are not located over the grab bars. Toilet paper dispensers should also be 7" minimum and 9" maximum in front of the water closet measured to the centerline of the dispenser and no more than 14" a.f.f.	3	2	I	\$0
<u>Grab Bar Location</u> Classroom bathrooms #1229, 1226, 1223, 1219, and 1216 have side grab bars that are 5¼" to 6" too far from the interior corner.	604.5 604.9	30.15	Relocate the side grab bars so they are no more than 6" from the interior corner.	3	2	I	\$0
<u>Water Closet Clearance</u> Classroom bathrooms #1229, 1226, and 1223 have water closets that are 13" to 21" too close to the far wall due to items stored next to the water closet.	604.9	30.14	Remove the items.	3	2	I	\$0

Classroom bathrooms #1229 and #1226 have less than 42" of clearance in front of the water closets due to items placed in front of the toilet.  See Photos NES 11 and 12.	604.9	30.14	Remove the items.	3	2	I	\$0
<b><u>Kindergarten Classroom Bathrooms</u></b> <b><u>Sink Faucets</u></b> Classroom bathrooms #1250, 1252, 1247, 1255, 1257, 1242, 1239, 1260, and 1235 have sinks with metered faucets that have operating forces of 7 to 10 lbs.	606.4 309.4	30.9.6 39.5	Adjust the faucets so they require no more than 5 lbs. to operate.	3	2	I	\$0
Classroom bathrooms #1250, 1252, 1247, 1255, 1257, 1242, 1239, 1260, and 1235 have sinks with metered faucets that stay open for only 4 to 8 seconds.	606.4	30.9.6	Adjust the faucets so the self-closing valves stay open for a minimum of 10 seconds.	3	2	I	\$0
<b><u>Toilet Paper Dispensers</u></b> Classroom bathrooms #1250, 1252, 1247, 1255, 1257, 1242, 1239, 1260, and 1235 have toilet paper dispensers that are 19" too high and located over the grab bars.	604.9.6	30.14.5	Relocate the dispensers so that they are not located over the grab bars. Toilet paper dispensers should also be 7" minimum and 9" maximum in front of the water closet measured to the centerline of the dispenser and centered at 14" to 17" a.f.f.	3	2	I	\$0
<b><u>Grab Bar Location</u></b> Classroom bathrooms #1250, 1252, 1247, 1255, 1257, 1242, 1239, 1260, and 1235 have side grab bars that are 5½" to 6" too far from the interior corner.	604.5 604.9	30.15	Relocate the side grab bars so they are no more than 6" from the interior corner.	3	2	I	\$0
<b><u>Water Closet Clearance</u></b> Classroom bathrooms #1252, 1257, and 1235 have water closets that are ½" too far from the near wall. <i>Note: There are no tolerances for a range of dimensions.</i>	604.9	30.14.2	Modify/relocate the water closets so they are 12" minimum to 15" maximum to the near wall.	3	3	I	Up to \$1,200+
<b><u>Water Closet Height</u></b> Classroom bathrooms #1250, 1252, 1247, 1257, 1242, and 1235 are ½" to 1" too high. <i>Note: There are no tolerances for a range of dimensions.</i>	604.9	30.14.3	Modify the water closets so they are 12" to 15" a.f.f. to the top of the seat.	3	3	I	Up to \$1,800+
<b><u>Level 1 Common Area Bathrooms</u></b> <i>Note: Standards applied for Ages 5 -8 (2010 ADA Standards) and Grades K - 3 (521 CMR Standards). If Standards for Ages 9 – 12 (2010 ADA Standards) and Grades 4 – 6 (521 CMR Standards) applied, then the water closet heights and setbacks would generally be in compliance, but grab bar heights would not be.</i>							
<b><u>Reduced Clear Widths</u></b> The hallway bathrooms have square waste disposals placed under the towel dispensers reducing the accessible route clear width to under 36".	403.5	20.3	Relocate the waste baskets or remove the waste baskets and replace with the stainless steel wall mounted baskets under the towel dispensers.	3	2	I	\$0



<u>Sink Faucets</u> The sink faucets at the following locations have faucets with operating forces up to 8 lbs. and stay on for only 3 to 9 seconds: <ul style="list-style-type: none"> <li>• Boy's Hallway Bathroom near the Cafeteria</li> <li>• Girl's Hallway Bathroom near the Cafeteria</li> <li>• Boy's Hallway Bathroom near the Media Room</li> <li>• Girl's Hallway Bathroom near the Cafeteria</li> <li>• Nurse's Office Bathroom</li> <li>• SPED Bathroom</li> </ul>	606.4 309	30.9.6 39.5	Adjust the faucets so the self-closing valves stay open for a minimum of 10 seconds and require no more than 5 lbs. to operate.	3	2	I	\$0
<u>Stall Doors</u> The stall doors open in and not out and also lack exterior pull devices in the following bathrooms: <ul style="list-style-type: none"> <li>• Boy's Hallway Bathroom near the Cafeteria</li> <li>• Girl's Hallway Bathroom near the Cafeteria</li> <li>• Boy's Hallway Bathroom near the Media Room</li> <li>• Girl's Hallway Bathroom near the Cafeteria</li> </ul>	604.8	30.6	Reverse the stall doors so they open out and not in. Install interior and exterior pull devices where required.	3	2	I	\$60
<u>Coat Hooks</u> The coat hooks at the following locations are up to 14" too high: <ul style="list-style-type: none"> <li>• Boy's Hallway Bathroom near the Cafeteria</li> <li>• Girl's Hallway Bathroom near the Cafeteria</li> <li>• Boy's Hallway Bathroom near the Media Room</li> <li>• Girl's Hallway Bathroom near the Cafeteria</li> <li>• Nurse's Office Bathroom</li> <li>• SPED Bathroom</li> </ul>	308	30.19	Lower the coat hooks to a height of no more than 40" a.f.f.	3	2	I	\$0
<u>Toilet Paper Dispensers</u> The toilet paper dispensers at the following locations are 7" to 22" too high: <ul style="list-style-type: none"> <li>• Boy's Hallway Bathroom near the Cafeteria</li> <li>• Girl's Hallway Bathroom near the Cafeteria</li> <li>• Boy's Hallway Bathroom near the Media Room</li> <li>• Girl's Hallway Bathroom near the Cafeteria</li> <li>• Nurse's Office Bathroom</li> <li>• SPED Bathroom</li> </ul> <p>In addition, the Nurse's Office, and SPED Bathroom toilet paper dispensers are located over the grab bars.</p>	604.9	30.14	Relocate the dispensers so they are 14" to 17" a.f.f., 7" to 9" o.c. from the front of the water closet, and not located above the grab bars.  Dispensers s/b checked regularly to ensure a smooth operation and which can be used with a loose grip or closed fist.	3	2	I	\$0

Some of the dispensers were difficult to operate as the toilet paper would not turn in the dispenser, possibly due to improper installation.							
<u>Grab Bar Location</u> The side grab bars are 12" from the interior corner at the following locations, which is 6" too far: <ul style="list-style-type: none"> <li>• Boy's Hallway Bathroom near the Cafeteria</li> <li>• Girl's Hallway Bathroom near the Cafeteria</li> <li>• Boy's Hallway Bathroom near the Media Room</li> <li>• Girl's Hallway Bathroom near the Cafeteria</li> <li>• Nurse's Office Bathroom</li> <li>• SPED Bathroom</li> </ul>	604.5	30.15	Relocate the side grabs so they are no more than 6" from the interior corner.	3	2	I	\$0
<u>Grab Bar Height</u> The Boy's Hallway Bathroom near the Cafeteria, the Girl's Hallway Bathroom near the Cafeteria, the Boy's Hallway Bathroom near the Media Room, and the Girl's Hallway Bathroom near the Media Center have grab bars that are 10" too high.	604.9	30.15	Relocate the grab bars so they are 20" to 25" a.f.f. to the top of the gripping surface.	3	2	I	\$0
<u>Water Closet Location</u> The Boy's Hallway Bathroom near the Cafeteria, the Girl's Hallway Bathroom near the Cafeteria, the Boy's Hallway Bathroom near the Media Room, and the Girl's Hallway Bathroom near the Media Center have water closets that are 2½" to 3½" too far from the near wall.	604.9	30.14.2	Relocate the water closets so they are 12" minimum to 15" maximum o.c. to the near wall.	3	3	I	TBD
<u>Water Closet Heights</u> The Boy's Hallway Bathroom near the Cafeteria, the Girl's Hallway Bathroom near the Cafeteria, the Boy's Hallway Bathroom near the Media Room, and the Girl's Hallway Bathroom near the Media Center have water closets that are 2½" to 3½" too high.	604.9	30.14.3	Relocate/modify the water closets so they are 12" to 15" a.f.f. to the top of the seat.	3	3	I	TBD
The SPED Bathroom and the Nurse's Office Bathroom have water closets that are ¼" to ½" too high.  See Photos NES 13 and 14.	604.9	30.14.3	Relocate/modify the water closets so they are 12" to 15" a.f.f. to the top of the seat.	3	3	I	TBD
<u>Level 2 Common Area Bathrooms</u> <i>Note: Standards applied for Ages 5 -8 (2010 ADA Standards) and Grades K - 3 (521 CMR Standards).</i>							
<u>Reduced Clear Widths</u> The hallway bathrooms have square waste disposals placed under the towel dispensers reducing the accessible route clear width to under	403.5	20.3	Relocate the waste baskets or remove the waste baskets and replace with the stainless steel wall mounted baskets under the towel dispensers.	3	2	I	\$0

36".							
<u>Sink Faucets</u> The sink faucets at the following locations have faucets with operating forces up to 8 lbs. and stay on for only 5 to 8 seconds: <ul style="list-style-type: none"> <li>• Boy's Hallway Bathroom near Stairs 1</li> <li>• Girl's Hallway Bathroom near Stairs 1</li> <li>• Boy's Hallway Bathroom near the Elevator</li> <li>• Girl's Hallway Bathroom near the Elevator</li> <li>• Bathroom Near #2227</li> </ul>	606.4 309	30.9.6 39.5	Adjust the faucets so the self-closing valves stay open for a minimum of 10 seconds and require no more than 5 lbs. to operate.	3	2	I	\$0
<u>Stall Doors</u> The stall doors open in and not out in the following bathrooms: <ul style="list-style-type: none"> <li>• Boy's Hallway Bathroom near Stairs 1</li> <li>• Girl's Hallway Bathroom near Stairs 1</li> <li>• Boy's Hallway Bathroom near the Elevator</li> <li>• Girl's Hallway Bathroom near the Elevator</li> </ul>	604.8	30.6	Reverse the stall doors so they open out and not in. Install interior and exterior pull devices where required.	3	2	I	\$0
<u>Coat Hooks</u> The coat hooks at the following locations are up to 14" too high: <ul style="list-style-type: none"> <li>• Boy's Hallway Bathroom near Stairs 1</li> <li>• Girl's Hallway Bathroom near Stairs 1</li> <li>• Boy's Hallway Bathroom near the Elevator</li> <li>• Girl's Hallway Bathroom near the Elevator</li> </ul>	308	30.19	Lower the coat hooks to a height of no more than 40" a.f.f.	3	2	I	\$0
<u>Toilet Paper Dispensers</u> The toilet paper dispensers at the following locations are up to 22" too high and located over the grab bars: <ul style="list-style-type: none"> <li>• Boy's Hallway Bathroom near Stairs 1</li> <li>• Girl's Hallway Bathroom near Stairs 1</li> <li>• Boy's Hallway Bathroom near the Elevator</li> <li>• Girl's Hallway Bathroom near the Elevator</li> <li>• Bathroom Near #2227</li> </ul> <p>Some of the dispensers were difficult to operate as the toilet paper would not turn in the dispenser, possibly due to improper installation.</p>	604.9	30.14	Relocate the dispensers so they are 14" to 17" a.f.f., 7" to 9" o.c. from the front of the water closet, and not located above the grab bars.  Dispensers s/b checked regularly to ensure a smooth operation and which can be used with a loose grip or closed fist.	3	2	I	\$0
<u>Grab Bar Location</u> The side grab bars are 12" from the interior corner at the following locations, which is 6" too far:	604.5	30.15	Relocate the side grabs so they are no more than 6" from the interior corner.	3	2	I	\$0

<ul style="list-style-type: none"> <li>• Boy's Hallway Bathroom near Stairs 1</li> <li>• Girl's Hallway Bathroom near Stairs 1</li> <li>• Boy's Hallway Bathroom near the Elevator</li> <li>• Girl's Hallway Bathroom near the Elevator</li> <li>• Bathroom Near #2227</li> </ul>							
<u>Water Closet Location</u> The Girl's Hallway Bathroom near Stairs #1 and the Boy's Hallway Bathroom near the Elevator have water closets that are ¼" to ½" too far from the near wall.	604.9	30.14.2	Relocate the water closets so they are 12" minimum to 15" maximum o.c. to the near wall.	3	3	I	TBD
<u>Water Closet Heights</u> The Bathroom near #2227 has a water closet that is ½" too high.	604.9	30.14.3	Relocate/modify the water closets so they are 12" to 15" a.f.f. to the top of the seat.	3	3	I	TBD
<b>Level 3 Common Area Bathrooms</b> <i>Note: Standards applied for Ages 9 - 12 (2010 ADA Standards) and Grades 4 - 6 (521 CMR Standards).</i>							
<u>Reduced Clear Widths</u> The hallway bathrooms have square waste disposals placed under the towel dispensers reducing the accessible route clear width to under 36".	403.5	20.3	Relocate the waste baskets or remove the waste baskets and replace with the stainless steel wall mounted baskets under the towel dispensers.	3	2	I	\$0
<u>Sink Faucets</u> The sink faucets at the following locations have faucets with operating forces up to 12 lbs. and stay on for only 5 to 9 seconds: <ul style="list-style-type: none"> <li>• Boy's Hallway Bathroom near Stairs 1</li> <li>• Girl's Hallway Bathroom near Stairs 1</li> <li>• Boy's Hallway Bathroom near the Elevator</li> <li>• Girl's Hallway Bathroom near the Elevator</li> <li>• Bathroom in #3226</li> </ul>	606.4 309	30.9.6 39.5	Adjust the faucets so the self-closing valves stay open for a minimum of 10 seconds and require no more than 5 lbs. to operate.	3	2	I	\$0
<u>Stall Doors</u> The stall doors open in and not out in the following bathrooms: <ul style="list-style-type: none"> <li>• Boy's Hallway Bathroom near Stairs 1</li> <li>• Girl's Hallway Bathroom near Stairs 1</li> <li>• Boy's Hallway Bathroom near the Elevator</li> <li>• Girl's Hallway Bathroom near the Elevator</li> </ul>	604.8	30.6	Reverse the stall doors so they open out and not in. Install interior and exterior pull devices where required.	3	2	I	\$0
<u>Coat Hooks</u> The coat hooks at the following locations are up to 10" too high: <ul style="list-style-type: none"> <li>• Boy's Hallway Bathroom near Stairs 1</li> </ul>	308	30.19	Lower the coat hooks to a height of no more than 44" a.f.f.	3	2	I	\$0

<ul style="list-style-type: none"> <li>• Girl's Hallway Bathroom near Stairs 1</li> <li>• Boy's Hallway Bathroom near the Elevator</li> <li>• Girl's Hallway Bathroom near the Elevator</li> </ul> <p><u>Toilet Paper Dispensers</u> The toilet paper dispensers at the following locations are up to 20" too high and located over the grab bars:</p> <ul style="list-style-type: none"> <li>• Boy's Hallway Bathroom near Stairs 1</li> <li>• Girl's Hallway Bathroom near Stairs 1</li> <li>• Boy's Hallway Bathroom near the Elevator</li> <li>• Girl's Hallway Bathroom near the Elevator</li> <li>• Bathroom in #3226</li> </ul> <p>Some of the dispensers were difficult to operate as the toilet paper would not turn in the dispenser, possibly due to improper installation.</p>	604.9	30.14	Relocate the dispensers so they are 17" to 19" a.f.f., 7" to 9" o.c. from the front of the water closet, and not located above the grab bars.	3	2	I	\$0
<p><u>Grab Bar Location</u> The side grab bars are 12" from the interior corner at the following locations, which is 6" too far:</p> <ul style="list-style-type: none"> <li>• Boy's Hallway Bathroom near Stairs 1</li> <li>• Girl's Hallway Bathroom near Stairs 1</li> <li>• Boy's Hallway Bathroom near the Elevator</li> <li>• Girl's Hallway Bathroom near the Elevator</li> <li>• Bathroom Near #3226</li> </ul>	604.5	30.15	Relocate the side grabs so they are no more than 6" from the interior corner.	3	2	I	\$0
<p><u>Grab Bar Height</u> The Boy's Hallway Bathroom near Stairs 1, the Girl's Hallway Bathroom near Stairs 1, the Boy's Hallway Bathroom near the Elevator, and the Girl's Hallway Bathroom near the Elevator have grab bars that are 1" too low.</p>	604.9	30.15	Relocate the grab bars so they are 25" to 27" a.f.f. to the top of the gripping surface.	3	2	I	\$0
<p><u>Water Closet Location</u> The Boy's Hallway Bathroom near Stairs 1 has a water closet that is ½" too close to the near wall.</p>	604.9	30.14.2	Relocate the water closet so that it is 15" minimum to 18" maximum o.c. to the near wall.	3	3	I	TBD
<p><u>Levels 1 – 3 Alternative Accessible Stalls</u> The Level 2 and Level 3 stalls have toilet paper dispensers that are located over the grab bars.</p>	604.9	30.14	Relocate the dispensers so they are 14" to 17" a.f.f. (K – 3 Standards), 7" to 9" o.c. from the front of the water closet, and not located above the grab bars.	3	2	I	\$0
<p>The Level 1 stall has grab bars that are 34½" and 35" a.f.f.</p>	604.9	30.15	Lower the grab bars so they are 20" to 25" a.f.f. to the top of the gripping surface (K-3 Standards).	3	2	I	\$0

The Level 1 – 3 coat hooks are 54" a.f.f., which exceeds the reach range for children.	308	30.19	The Level 1 and 2 coat hooks should not exceed 40" a.f.f. and the Level 3 coat hooks no more than 44" a.f.f.	3	2	1	\$0
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TBD - Up to \$8,710+

### **Northbridge Elementary School Accessibility Assessment Photos**

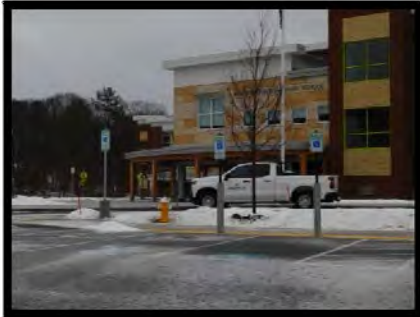


Photo NES 1



Photo NES 2



Photo NES 3



Photo NES 4



Photo NES 5



Photo NES 6



Photo NES 7



Photo NES 8



Photo NES 9



Photo NES 10



Photo NES 11



Photo NES 12



Photo NES 13



Photo NES 14



## **NORTHBRIDGE MIDDLE SCHOOL**

**Description of Facility:** Northbridge Middle School is a 3-story masonry building totaling roughly 192,000 square feet and housing approximately 510 students from grades 6 - 8. The school was built in 1906 and has had numerous additions and expansions with major renovations occurring in 1954 and 1986 – 1989.



**Responsible Party:** Northbridge School Department/School Committee.

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

### **General Description or Obstacle Which Limits Mobility or Access:**

#### **Designated Accessible Parking**

The front designated accessible parking has signage that is too high, running slopes that vary up to 3.8%, deteriorated and unstable surfaces, and the lack of van designated spaces in 2 of the 3 separate front parking areas. Two of the spaces closest to the main entrance lack access aisles.

The side designated accessible parking spaces next to the ramp are deteriorated creating an unstable surface. The van designated accessible space lacks an access aisle and the passenger designated accessible aisle is too narrow.

#### Exterior Accessible Routes of Travel

**Accessible Route from Front Parking.** The front designated accessible parking is located in 3 separate areas. The accessible route of travel from the parking closest to the front entrance lacks a detectable warning strip at the curb ramp. In addition the curb ramp is severely deteriorated, has abrupt changes in level surface of up to 1+ inches, a running slope of up to 14.4 %, and lacks a level landing at the top of the curb ramp. The accessible route of travel from the middle parking to the school side lacks detectable warning strip at the curb ramp. In addition the curb ramp is severely deteriorated, has abrupt changes in level surface of up to 2+ inches, a running slope of up to 12.0 %, and lacks a level landing at the top of the curb ramp. The accessible route of travel from the parking near the far entrance/exit across from the football field lacks a detectable warning strip on the parking lot side and enters into 6" to 8" granite curbing on the school/football field side.

**Accessible Route Between Main Entrance and Ramp to Classrooms.** The walkway is severely deteriorated with heaving and abrupt changes in level surface of up to 1". Some walkway segments have running slopes of up to 6.2%.

**Front Stairs.** The stairs between the front walkways have railings on one side only with non-compliant bottom extensions. The egress stairs from the older section of the school lack railings. In addition, there is no directional signage in this area noting the location of the accessible entrance.

**Side Ramp and Stairs.** There are abrupt changes in level surface of up to 2" along the accessible route of travel from the asphalt parking to the concrete walkway. The stairs are severely deteriorated creating uneven surfaces. Segments of the upper ramp to the main building level have running slopes that vary up to 9.0%. In addition, there are areas of severe deterioration and erosion and soil deposits creating abrupt changes in level surface along the ramp run. The upper railings are ½" to 2" too low.

**Exterior Courtyard Stairs.** The stairs have a railing on one side only, lack compliant top and bottom railing extensions, and have railings that are too low.

#### Common Areas and General

Picnic tables located in courtyard areas are not on an accessible route of travel and lack minimum knee depth. Interior and exterior doors with closers have operating forces and closing speeds which exceed that allowed. Some doors lack tactile designation signage or have improperly mounted signage. In addition, there are also doors that have non-compliant knob style hardware. Protruding objects exist in the hallways and in some classrooms. Items such as fire alarm pulls, sanitizers, defibrillators, light switches, controls, etc. are not within reach range. A number of hallway and classroom doors have glass panes which are too high. Drinking fountains vary throughout with some being "low" only, some "high" only and some not being in service. The elevator lacks a tactile star on the elevator jams on the main level. In addition, the elevator requires the use of a key to operate which requires pinching and twisting of the wrist. The "Red" Level 1 section has lockers that have coat hooks and shelving that is too high. A number of classrooms and accessible routes of travel have thresholds that are too high. The Main Office

counter is 4" too high. Wooden tables in the library, science, and art labs do not provide the minimum required knee clearance. Staff work sinks/counters are too high and lack knee clearance. The cafeteria serving counters are up to 2" too high.

#### Stairs and Railings

Stairs and railings vary throughout. Typically the railings lack compliant top and bottom extensions, have interior railings that are not continuous, lack a railing on one or both sides, and are up to 3" too low.

#### Ramps

Ramps are located throughout the building. Typically, there are ramp segments which exceed the maximum running slope of 8.3%. In addition, some of the railings are too low and lack compliant top and bottom extensions.

#### Classrooms

Classrooms typically have interior closet and storage room doors with non-compliant knob hardware and no tactile designation signage. In addition, classroom pass-through doors and hallway exit doors lack tactile designation signage. Temperature controls and telephones are not within reach range. A number of classrooms also have less than the required 18" of maneuvering clearance on the latch pull side of the door under both S. 404.2.4 of the 2010 ADA Standards and S. 26.6 of 521 CMR from either the hallway or classroom side. In some cases wall mounted white boards serve as protruding objects. Typically the desks and tables throughout the regular classrooms did meet knee clearance (27" a.f.f.) and table/desk top height requirements (28" to 34" a.f.f), but not necessarily the minimum required 30" clear width. In those instances where they did not, the tables/desks could be adjusted and raised as needed or adjustable/compliant desks could be brought into a classroom to address an accommodation.

#### Science Classrooms

The science classrooms have eyewash stations that are not functional for a wheelchair user and with limited exception, the adjacent emergency shower pull chains are not within reach range. In addition, fire blankets and first aid kits are not within reach range. With the exception of Science Classroom #315, none of the other classrooms have an accessible sink. None of the science sinks have compliant hardware as they all require pinching and twisting of the wrist. None of the teacher sinks comply with height, knee clearance, and hardware standards. In addition, student work tables do not provide the minimum required 27" knee clearance.

#### Kitchen

The kitchen area itself has numerous elements of non-compliance (bathroom, reach ranges, knee clearances, clear widths, etc.) but most of the activities undertaken require personnel who must meet certain physical requirements to perform the essential functions of their position. Therefore, no further action is required at the present time unless dictated by a request for a reasonable accommodation.

#### Community Closet

There is no accessible route of travel to the Community Closet entrance from the outside. There is no accessible route into the building as there is a 5" rise as well as 4 descending stairs. The interior stairs are 6" too low and lack bottom extensions.

#### Lower Boy's (#139) and Middle School Football Locker Rooms

These 2 areas are wholly non-compliant and inaccessible. There is no accessible route of travel into either area with the only means of access being via multiple sets of stairs. The stairs have non-compliant railings that are up to 4" too low and lack bottom extensions. Benches are too narrow and lack back support. Lockers have coat hooks and shelving that are not within reach range. Doors lack tactile designation signage and have knob-style hardware. Showers have a 5" abrupt change in level surface to enter or are too narrow (20" clear width) and lack accessible features. Bathrooms are also wholly non-compliant as the sink piping is not wrapped, guarded, or insulated; faucets require pinching or twisting of the wrist; dispensers, coat hooks, and mirrors are too high; toilet paper dispensers are too close to the water closets; the water closets are too low and do not meet near side, far side, and front clear width requirements; the water closets lack grab bars; and urinals are too high.

#### Boy's and Girl's Gym Lockers and Bathrooms

Both of these areas (Boy's and Girl's) are substantially non-compliant and inaccessible even though the improperly door mounted signage from the outside has the Universal Symbol of Accessibility. The locker benches are too narrow and lack back support. Lockers have coat hooks and shelving that are not within reach range. There is insufficient clear width around the benches. The interior rooms/offices lack tactile designation signage. Showers lack accessible features. The sinks lack compliant knee clearance and the piping is not wrapped, guarded, or insulated. The mirrors and dispensers are too high. The Boy's urinal is 7" too high. The water closet stall doors open in and not out; are not self-closing; lack pull devices; lack coat hooks; have toilet paper dispensers that are too far from the water closet; and have water closets that are too low, do not meet far side and front clear widths, and lack grab bars. The air dryer in the Girl's locker room is a protruding object. The Boy's and Girl's PE offices include 32" x 32" non-compliant and inaccessible (6" abrupt change in level surface) showers as well as non-complaint bathrooms with sink piping that is not wrapped and faucets that require pinching and twisting of the wrist; mirrors and dispensers that are too high; toilet paper dispensers that are too far from the water closets; and water closets that are too low, do not meet near/far/front clear widths, and lack grab bars.

#### Band Room

There is no accessible route of travel between the lower and upper levels of the band room. Stairs connecting the interior of the band room lack railings.

#### Auditorium

The auditorium provides seating for approximately 627 persons, which is to include accommodation for a minimum of 7 wheelchairs dispersed throughout the place of assembly with adjacent companion seating. In addition, a minimum of 1% of the fixed seating must be aisle seats with no armrests on the aisle side or have removable or folding armrests (521 CMR) or 5% of the aisle seats (2010 ADA Standards) having the same armrest features. These seats must be identified by a sign or marker. In addition, signage must be posted notifying patrons of the availability of such seating. The auditorium does not provide any designated wheelchair spaces or aisle seats with removable or folding armrests. Three of the staircases leading to the assembly area lack railings on the wall side. The sole staircase with a railing is non-compliant as it is not round or oval in shape. The ramp to the assembly area has an upper railing that is ½" too low. There is no accessible route of travel to the stage from the assembly area. The stairs (2 sets) from the assembly area to the stage lacks railings. The stairs from the back of the stage to the assembly area have railings that are too low and that lack top and bottom extensions.

There also does not appear to be the availability of an assistive listening system (ALS) as there is no signage in the assembly area notifying patrons of an ALS. Based on the number of seats, an ALS with a minimum of 24 receivers is required, of which at least 6 being hearing aid compatible.

The control booth is not on an accessible route of travel as stairs are the only means to gain entry. The stairs lack railings.

### Staff and Student Bathrooms

The staff bathrooms have varying levels of non-compliance including sinks that are too low; sink piping that is not wrapped or insulated and have faucets that require pinching or twisting of the wrist; dispensers, coat hooks, mirrors, and light switches that are too high; stall doors that open in, are not self-closing, and lack pull devices; improperly mounted toilet paper dispensers; water closets that are too high or low, have flush controls on the wrong side, and do not meet setback requirements; the lack of grab bars or grab bars at the incorrect height and location; and the lack of audible and visual alarms, among other areas of non-compliance.

## Northbridge Middle School Accessibility Assessment

General Description of Obstacle	2010 ADAAG	MAAB 521 CMR	Type of Action to be Taken	P	F	T E	Cost Estimate
<b>Parking</b> <u>Front Entrance Parking</u> The front designated accessible parking has signage that is up to 24 inches too high in 7 of 8 spaces. Running slopes vary up to 3.8% in the 4 spaces closest to the entrance and the in the 2 middle spaces. There are no van designated spaces in the middle designated parking and the designated accessible parking across from Lasell Field. All of the spaces have areas of deterioration and heaving creating unlevel and unstable surfaces. Two of the spaces closest to the main entrance lack access aisles.	502 703.7.2	23	Reconstruct and repave the accessible parking spaces as follows: stripe and designate at least one van accessible parking space in each separate designated parking location 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); reconfigure the parking across the main entrance to provide a shared 5' access aisle for the 2 end designated passenger vehicle accessible spaces; 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; once repaved, slopes should not exceed 2% in any direction.	1	3	N	Up to \$30,000
<u>Side Entrance Parking</u> The 3 side designated accessible parking spaces (1 van, 2 passenger) next to the ramp are deteriorated creating an unlevel and unstable surface. The van designated accessible space lacks an access aisle and the passenger shared designated accessible aisle is 1' too narrow. The van accessible space signage is 2" too high.  See Photos NMS 1 and 2.	502 703.7.2	23	Reconstruct and repave the accessible parking spaces as follows: stripe and designate a 5' accessible aisle for the van designated accessible space (Note: as the van accessible space is 12' wide, a 5' access aisle would meet the required total width requirement of 16'. If the van accessible space is restriped at 8' in width, then an 8' access aisle would be required); reconfigure and restripe the shared passenger vehicle access aisle so that it is 5' wide; 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; once repaved, slopes should not exceed 2% in any direction.	1	3	N	Up to \$15,000



The top ramp railings are consistently ½" to 2" too low.	505.4	24.5	Modify the railings such that the top railings are 34" to 38" a.f.f. to the top of the gripping surface.	1	3	L	TBD
Runoff and erosion into the mid segment of the ramp restricts the clear width and creates an abrupt change in level surface.  See Photo NMS 10.	303	20	Remove the debris from the ramp.	1	2	I	\$0
<b>Directional Signage</b> Outside directional signage at the front of the older section of the school facing Linwood Street directing patrons to the accessible entrance is not provided.	216	41.1.3	Provide directional signage noting the accessible side/rear entrances.	1	2	I	\$200
<b>Courtyard Picnic Tables</b> The picnic tables in the interior courtyard are inaccessible as they are not on an accessible route of travel and lack sufficient knee depth (only 11").	226.1 902 403	19 22	At least 5% or at least one table must be accessible and on an accessible route of travel. Purchase an accessible picnic table with a table surface of 28" to 34" a.f.f. to the top with at least 27" knee clearance, 30" clear width, and 19" depth.	2	2	I	Up to \$750
<b>Exterior and Interior Doors</b> Exterior and interior doors with closers (including bathrooms) do not fully comply with the maximum allowed operating force for an exterior door (15 lbs.), interior door (5 lbs.), and minimum closing speed requirement of 6 seconds under 521 CMR. Assessments ranged from 3 to 4 seconds closing speed and up to 25 lbs. operating force.	404.2.8 404.2.9	26.8 26.9	Adjust door closers such that the push/pull force does not exceed 15 lbs for an exterior door and 5 lbs. for an interior door with door closing speeds of at least 6 seconds.	1, 3	2	I	\$0
<b>Elevator</b> The door jamb markings for the main entry level lacks a tactile star designation. Also see Door Hardware.	407.2	28	Provide a tactile star designation at the entry level elevator jambs.	1	2	I	\$25
<b>Door Signage</b> Tactile designation signage is not provided at the following locations:  <u>Level 1</u> <ul style="list-style-type: none"> <li>Lobby auditorium (3)</li> <li>Hallway behind front office</li> <li>Lobby Men's and Women's bathrooms</li> <li>Custodian door in lobby women's bathroom</li> <li>Auditorium double doors (3)</li> <li>Auditorium inside double doors (2)</li> <li>Auditorium side storage (2)</li> <li>Auditorium exit doors (5)</li> <li>Auditorium control booth</li> <li>Band room (10)</li> <li>Mechanical Room near #139</li> <li>#139 Boy's locker room (10)</li> <li>#140 middle school football lockers (14)</li> <li>Gym (2)</li> <li>Gym boy's locker room (3)</li> <li>Gym girl's locker room (3)</li> </ul>	703	41.1	Install, replace, and/or relocate accessible compliant designation signage on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Under 521 CMR, signage s/b 60" a.f.f. to the centerline of the sign. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).  In addition, accessible bathrooms must include the Universal Symbol of Accessibility.	2	2	I	Up to \$21,875



<ul style="list-style-type: none"> <li>• Modular classrooms (4)</li> <li>• Doors under stairwells (2)</li> <li>• #103 storage (2)</li> <li>• Door to kitchen</li> <li>• Door to #116A</li> <li>• #116A to storage</li> <li>• Kitchen (6)</li> <li>• #124 2<sup>nd</sup> door</li> <li>• Door to #123</li> <li>• #123 padded room</li> <li>• Community Closet (5)</li> <li>• Storage across #119</li> <li>• Blue Level 1 janitor's closet</li> <li>• Blue Level 1 boiler room</li> <li>• Blue Level 1 office</li> <li>• #107 (3)</li> <li>• Classroom pass-through doors, closet doors, storage doors, and exit doors</li> </ul> <p>In addition, there is no tactile star designation on the elevator jambs of the main level and no tactile designation on the floor levels of the cab controls.</p> <p><u>Level 2</u></p> <ul style="list-style-type: none"> <li>• Custodian closets near bathrooms</li> <li>• Storage by #231</li> <li>• Storage and custodian across #249 (3)</li> <li>• Hallway door to administrative office</li> <li>• Administrative office (3)</li> <li>• Library double doors</li> <li>• Library from staff room</li> <li>• Library #C108</li> <li>• Library #C109 not on latch side</li> <li>• Room #225</li> <li>• Nurse's Office (4)</li> <li>• Classroom #228 bathroom</li> <li>• Classroom pass-through doors, closet doors, storage doors, and exit doors</li> </ul> <p><u>Level 3</u></p> <ul style="list-style-type: none"> <li>• Custodian in hallway</li> <li>• Door by hallway doors</li> <li>• Door by staff bathrooms</li> <li>• M206 at top of stairs</li> <li>• Storage at top of stairs</li> <li>• Classroom pass-through doors, closet doors, storage doors, and exit doors</li> </ul> <p>In addition, the tactile designation signage at Room #327 and the outside bathroom/locker signage are not on the latch side of the doors.</p>	407.2	28	Provide a tactile star designation at the entry level elevator jambs and within the cab on the floor levels of the controls.	2	2	I	\$100
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<b>Door Hardware</b> The following interior doors have non-compliant knob style hardware:  <u>Level 1</u> <ul style="list-style-type: none"> <li>#139 Boy's locker room</li> <li>#104</li> <li>Door to #123</li> <li>#123 storage room/door to #120</li> <li>Community closet (3)</li> <li>Auditorium mechanical room</li> </ul> <u>Level 2</u> <ul style="list-style-type: none"> <li>Door to front stairs by #213</li> <li>Door to front stairs by #203</li> <li>Nurse's office</li> </ul> In addition: <ul style="list-style-type: none"> <li>Level 1, 2, and 3 classroom closet, storage, and pass-thru doors have non-compliant knob style hardware.</li> <li>The elevator operating mechanism requires the use of a key and therefore pinching and twisting of the wrist.</li> </ul>	404.2	26.11	Install lever-style or similar accessible compliant hardware on the interior doors.  Modify the elevator operating mechanism to eliminate the use of fingers and twisting of the wrist to operate.  <i>Note: Depending on the door and type/quality of hardware, lever hardware may vary from \$75 to \$275 per unit. The estimate provided is at the mid-range (\$150) for the interior doors.</i>	2	2	I	Up to \$6,150+
				2	3	N	TBD
<b>Doors with Glass Panes</b> Hallway and room doors have oval glass panes that are up to 62" a.f.f. Classrooms have rectangular glass panes that are up to 53" a.f.f.	404.2.11	NA	Doors, gates, and side lights adjacent to doors or gates, containing panels that permit viewing through the panels shall have the bottom of at least one panel located 43 inches maximum a.f.f.  Frost or block the glass panes.	4	2	N	\$0
<b>Protruding Objects</b> <ul style="list-style-type: none"> <li>Main Level lobby defibrillator (7¼" protrusion at 51" a.f.f.)</li> <li>Main Level display case in hallway behind front office (12" protrusion at 35" a.f.f.)</li> <li>Level 2 drop box near #230 (7" protrusion at 33" a.f.f.)</li> <li>Level 2 telephone (14" protrusion at 28½" a.f.f.)</li> <li>Level 3 classroom #319 whiteboard (9" protrusion at 32½" a.f.f.)</li> <li>Level 3 classroom #315 whiteboard (9" protrusion at 40¼" a.f.f.)</li> <li>Level 3 classroom #311 whiteboard (9" protrusion at 40¼" a.f.f.)</li> <li>Drinking fountain in Level 1 Blue hallway 32" a.f.f. at the base with a 7" protrusion.</li> </ul>	307.2	20.6.1	Place fixed objects or wing walls at each end of the items for cane detection. Remove the wall-mounted telephone.	2	2	I	\$0 to \$100

<p>Protruding objects extend more than 4" into the accessible route of travel between a height of 27" and 80" a.f.f. or have vertical headroom clearance reduced to less than 80".</p> <p>See Photos NMS 11 and 12.</p>							
<p><b>Reach Range</b> The following exceed the maximum reach range height for an adult under the 2010 ADA Standards:</p> <ul style="list-style-type: none"> <li>• Main Level defibrillator near auditorium (59" a.f.f.)</li> <li>• Main Level Hand sanitizer near stairs at auditorium (58" a.f.f.)</li> <li>• Classroom #107 coat hooks (10 at 68" a.f.f.)</li> <li>• Classrooms #107, #326, #313, #315, #311, 312, 310 life saving blanket (56" to 63" a.f.f.)</li> <li>• Classrooms #326, #315 eyewash stations (69" to 71" a.f.f.)</li> <li>• Classroom #310 first aid kit (58" a.f.f.)</li> <li>• Main Level Red Section Lockers (66 lockers with coat hooks at 63" a.f.f. and shelving at 65½" a.f.f.)</li> <li>• Library towel dispenser (51" a.f.f.)</li> <li>• Nurse's Office defibrillator (58" a.f.f.)</li> <li>• Telephones (band room, #'s 110, 108, 124, 132, 130, 135, 221, 222, 225, 237, 236 234, 229, 228, 230, 233, 239, 241, 242, 243, 248, 245, 249, 205, 316, 317, 318, 319, 320, 321, 323, 324, 326, 313, 325, 315, 309, 312, 310, 303</li> <li>• Room temperature controls (up to 62" a.f.f.)</li> <li>• Dispensers/Sanitizers (Library, Nurse's Office, #311,</li> <li>• Fire alarms (up to 53" a.f.f.)</li> <li>• Light switches (up to 50" a.f.f.)</li> </ul> <p>See Photos NMS 13 and 14.</p>	308.2 308.3	6.5 6.6	<p>The maximum reach range is 48" a.f.f. under the 2010 Standards.</p> <p>Items (dispensers, sanitizers, telephones, fire alarms, defibrillators, life saving blankets, first aid kits, controls, and switches) need to be lowered to a height of no more than 48" a.f.f.</p> <p>At least 5% of the lockers must have shelving and coat hooks no higher than 48" a.f.f.</p>	2,4	2.3	N	TBD
<p><b>Cafeteria Tray Slides</b> The tray slide heights vary up to 36", which is 2" too high.</p>	904.5	17.6.2	Modify or replace the tray slides with ones that are no higher than 34" a.f.f.	2	3	N	TBD
<p><b>Drinking Fountains</b> The main level drinking fountain by the front office is "low" only; the main</p>	602 305	36	Option #1: Discontinue use of the drinking fountains.	2	3	N	Up to \$5,000+

level drinking fountain near the lockers is “high-low”, but the “low” fountain is not in service; the boy’s locker room drinking fountain is “high” only with no knee clearance; the Level 1 Blue hallway drinking fountain is “high” only and the faucet requires pinching and twisting of the wrist; the Level 2 drinking fountain near #234 is “high” only with no knee clearance.	306		<p>Option #2 – Add a companion “high” or “low” drinking fountain where required and place the “low” drinking fountain near the lockers back into service. The drinking fountains must comply as follows:</p> <p>Protruding objects compliance of no &gt; 4” protrusion between 27” and 80” a.f.f. (307); 30”x48” clear space requirement (305), and knee/toe clearance (306). The spout s/b 15” min from wall and 5” max from the front edge of the unit (602.5). Flow of water 4” high min and spout located max 5” from front (602.6). and with the water flow within 3” from the front edge (36.3). The spout height s/b 38” min a.f.f. to 43” max a.f.f. for “high” and 36” a.f.f. max for “low” (602.4, 36.4). The controls s/b operable w/one fist; no &gt; 5 lbs force (309.4).</p>				
<p><b><u>Emergency Eyewash Stations</u></b></p> <p>Science classrooms #315 and #311 are fixed and are too high and lack knee clearance for wheelchair use.</p> <p>See Photo NMS 15.</p>	606	12	Provide eye wash stations that are within reach and use range for a wheelchair user. See Section X of this Plan for guidance.	4	3	N	TBD
<p><b><u>Door Thresholds</u></b></p> <p>Doorways to and within the following areas have greater than ½” beveled thresholds:</p> <ul style="list-style-type: none"> <li>Rooms #119, 124, 237, 213, 206, 204, 318, 302, 305, 306, 303.</li> </ul>	404.2	26.10	Modify thresholds so that the maximum 1:2 beveled change in level surface is no more than ½”.	2	2	N	Up to \$3,000
<p><b><u>Door Maneuverability</u></b></p> <p>The following doors have less than the required 18” of maneuvering clearance on the latch pull side of the door:</p> <ul style="list-style-type: none"> <li>Classroom pass-through doors</li> <li>Hallway side (#110, 107, kitchen, 116A 237, 203, 213, 204, 315)</li> <li>Classroom side (#108 225, 237(2), 236, 241, 242, 243(2), 244(2), 248, 245, 249, 205, 203, 201, 302, 305)</li> <li>Nurse’s office (interior)</li> </ul> <p>See Photo NMS 16.</p>	404.2.4	26.6	There should be a minimum of 18” clearance on the latch pull side of the door for maneuverability. Options for compliance include keeping the doors in an open position, installing automatic door openers, and modifying/reconstructing the door openings (as feasible).	2	1,3	N	\$0 to \$100K+
<p><b><u>Interior Stairs and Stair Railings</u></b></p> <p>There are numerous stairs throughout the building, with none being wholly compliant as follows:</p> <ul style="list-style-type: none"> <li>Lobby stair railings lack compliant bottom extensions</li> <li>The auditorium has 4 sets of stairs with only 1 having a sole railing that is not round or oval in shape and lacks compliant extensions</li> <li>The auditorium control booth lacks railings</li> <li>There are no railings for the 2 sets of stairs from</li> </ul>	505	27.4	<p>Modify and/or install railings as follows:</p> <p>Railings s/b on both sides of the stairs with the interior railings being continuous; at a height of 34” – 38” to the top of the handrails, round or oval in x-section and between 1¼” – 2” in outside diameter; extensions at the top 12” parallel to the floor and the slope distance of one tread then 12” parallel to the floor at the bottom.</p>	2	3	L	TBD – up to \$250K+

<p>the auditorium assembly area to the stage</p> <ul style="list-style-type: none"> <li>• The stairs behind the stage have railings that are 2" to 3" too low and lack compliant extensions</li> <li>• The band room stairs lack railings</li> <li>• The stairs next to the main level ramp from blue to red section have railings that are 2" too low and lack top and bottom extensions</li> <li>• The stairs by the Admin Office have railings that are 2" to 4" too low, are non-continuous on the interior, and lack top and bottom extensions</li> <li>• The boy's locker room (#139) and football locker room have stairs with railings that 2" to 4" too low and lack compliant extensions</li> <li>• The egress stair railings in #124 are 4" too low, rectangular in shape, are located on one side only, and lack bottom extensions</li> <li>• The stairs between Levels 3 and 3R have railings that are 1" to 2" too low and lack compliant bottom extensions</li> <li>• The Community Closet stair railings to the outside are 6" too low and lack bottom extensions</li> <li>• The stair railings between levels have varying degrees of non-compliance including not being round or oval in shape, up to 1" too wide, up to 4" too low, the lack of compliant extensions, and not being continuous for the inside railings.</li> </ul> <p>See Photos NMS 17, 18, 19, and 20.</p>							
<p><b>Admin/Principal's Office Counter</b> The counter is 40" a.f.f., which is 4" too high.</p>	904.4	7.2	Construct a 36" long by no more than 36" high a.f.f. counter, with a minimum of 27" of knee clearance.	2	3	N	Up to \$250
<p><b>Lack of Accessible Route of Travel</b> There is no exterior accessible route of travel to the Community Closet (stairs only).</p>	206	20	<p>Option #1: Relocate the Community Closet so that it is on an accessible route of travel from the outside.</p> <p>Option #2: Restrict access to the Community Closet from the inside of the building only.</p>	2 2	2 1	I I	\$0 \$0

There is no accessible route of travel to the Auditorium Control Booth (stairs only).	206	20	Option #3: Install a vertical platform lift to access the Community Closet from the outside.	2	4	L	Up to \$100K
There is no accessible route of travel from the Auditorium assembly area to the stage.	206	20 14.6	Construct a ramp to the Control Booth compliant with S. 405 and 505 of the 2010 ADA Standards and Section 24 of 521 CMR.	2	4	L	Up to \$35,000
There is no accessible route of travel to the Boy's Locker Room (#139) and the Middle School Football Locker Room.	206	20	A vertical lift, inclined wheelchair lift, or ramp must be provided to achieve access to the stage from the assembly area (206.2.6; 14.6).	2	4	L	Up to \$50,000
			Option #1: Close the locker rooms and restrict further use.	2	1	I	\$0
There is no accessible route of travel between levels in the Band Room.			Option #2: Install vertical platform lifts to access the locker rooms.	2	4	L	Up to \$200K
			Reconstruct and reconfigure the Band Room to provide ramped or mechanical (vertical platform lift) between levels.	2	4	L	Up to \$150K
<b>Interior Ramps</b>							
Ramps are located throughout the building. Typically, there are ramp segments which exceed the maximum running slope of 8.3%. In addition, some of the railings are too low and lack compliant top and bottom extensions.							
Ramp running slopes in excess of 8.3% (slopes vary from 8.5% to 12.5%):	405.2	24.2	As feasible, modify the ramp running slopes so they do not exceed 8.3%.	2	3	L	TBD
<ul style="list-style-type: none"> <li>Main level ramp to lockers, main level orange section to blue section, near modular classrooms, near library, from #237 to teacher's lounge, across #206 to elevator/library, level 3 at building transition, level 3 to level 3R.</li> </ul>							
Top railings are ¼" to 1" too low:	505.4	24.5	As feasible, modify the top ramp railings so they are 34" to 38" a.f.f. to the top of the gripping surfaces.	2	3	L	TBD
<ul style="list-style-type: none"> <li>Auditorium, main level ramp to lockers, main level orange section to blue section, main level blue section to red section, level 2 by library, level 3 at the building transition.</li> </ul>							
Bottom railings are ½" to 1½" too low:	505.4	24.5	As feasible, modify the bottom ramp railings so they are 18" to 20" a.f.f. to the top of the gripping surfaces.	2	3	L	TBD
<ul style="list-style-type: none"> <li>Near modular classrooms, from #237 to teacher's lounge.</li> </ul>							
Non-complaint railing extensions:	505.10	24.5	As feasible, modify the ramp railings so they have 12" extensions parallel to the floor at the top and bottom of the ramps.	2	3	L	TBD
<ul style="list-style-type: none"> <li>Near modular classrooms (top not fully secure, lower broken), main level blue section to red section (bottom not 12" beyond base), level 2 by library (not 12" beyond base),</li> </ul>							

from #237 to teacher's lounge (3 of 4 not 12" beyond base), level 3 at the building transition (no bottom extensions).							
See Photos NMS 21 and 22.							
<b>Auditorium</b> The auditorium provides seating for approximately 627 persons, which is to include accommodation for a minimum of 7 wheelchairs dispersed throughout the place of assembly with adjacent companion seating. In addition, a minimum of 1% of the fixed seating must be aisle seats with no armrests on the aisle side or have removable or folding armrests (521 CMR) or 5% of the aisle seats (2010 ADA Standards) having the same armrest features. These seats must be identified by a sign or marker. In addition, signage must be posted notifying patrons of the availability of such seating. The auditorium does not provide any designated wheelchair spaces or aisle seats with removable or folding armrests.  There also does not appear to be the availability of an assistive listening system (ALS) as there is no signage in the assembly area notifying patrons of an ALS. Based on the number of seats, an ALS with a minimum of 24 receivers is required, of which at least 6 being hearing aid compatible.  See Photo NMS 23.	221 802 219 706	14	Develop a seating plan compliant with 521 CMR (14.2) and the 2010 ADA Standards (221.2) which provides dispersed seating for line of sight and horizontal placement. Wheelchair viewing must be equal to or greater than average viewing. At least one companion seat shall be provided for each wheelchair space. Based on the total number of "seats", 7 wheelchair viewing spaces and 7 companion spaces are required. ADAAG (802.1) requires wheelchair space to be 36" wide x 48" deep for a front or rear approach and 60" deep if there is only a side approach. In addition, if wheelchair spaces are paired, the widths can be reduced to 33" in width. 521 CMR calls for 60" long x 36" wide spaces.  One percent of all fixed seating or a minimum of 7 seats must be designated aisle seats or armless seats with no armrests or folding, retractable, or moveable armrests on the aisle side. Each such seat must be identified by a sign or marker. These seats are not required to be on a level surface.  Provide an assistive listening system which has 24 receivers with 6 being hearing-aid compatible. Provide signage denoting availability of the ALS system with the International Symbol of Accessibility for Hearing Loss.	2  2  2	3  3  3	N  N  N	Up to \$500  Up to \$7,500+  Up to \$10,000
<b>Science Classrooms (#310 – 312, #315, #325)</b>  Teacher sink work stations in all of the classrooms (classroom and lab/storage rooms) are too high, lack knee clearance, and have faucets that require pinching and twisting of the wrist.  The Classroom #315 "accessible" sink work station is within compliant height and knee clearance, but has faucets that require pinching and twisting of the wrist.  Classroom #311 has 12 sink work stations that are 2" too high and have faucets that require pinching and twisting of the wrist.  Classroom #312 has 14 sink work stations that provide only 24" to 25" of knee clearance, which are 2" to 3" too low. Faucets require pinching and	226 902 306 309 606	35 12 36.5	<u>Teacher Work Stations</u> Modify the teacher sink work stations with compliant height (28" – 34" a.f.f.), knee clearance (minimum 27"), and faucets that can be operated with a loose grip or closed fist as may be required as a reasonable accommodation request.  <u>Student Work Stations</u> Option 1: Modify one work station in each classroom where required so that there is a 30" wide space with a minimum of 27" knee clearance at a height of no more than 34" a.f.f. Workspace shall include a sink w/compliant lever or self metered hardware with both the sink/hardware and gas fixtures within reach range.  Option 2: Purchase an ADA Accessible Portable Science Labs with student and/or faculty use. See Photo NMS 26.	2  2  2	3  3  3	L  L  N	\$0 to TBD  Up to \$9,000+  Up to \$3,000



twisting of the wrist. Classroom #310 has 2 classroom sinks that are 2" too high, lack knee clearance, and require pinching and twisting of the wrist. <a href="#">See Photos NMS 24, 25, and 26.</a>							
<b><u>Library and Life Skills Classrooms</u></b> The Library has 10 rectangular tables and 4 round tables with only 26" to 26½" of knee clearance, which is ½" to 1" too low. The Life Skills classroom has 10 tables with only 25" of knee clearance, which is 2" too low.  The Library has a sink that is 2" too high and lacks knee clearance. The Life Skills classroom has 4 sinks that are in service that are 2" too high and lack knee clearance.  The Life Skills classroom stove has controls on the back, not on the front.	226.1 306.3 902.3  804.3.2 306.3  804.6.5	35.1 35.4 35.5  32.2 32.6  32.8	Block at least one table in each location to achieve the minimum required 27" knee clearance. If blocking is not feasible, provide a compliant table in each location.  Modify the counters and sinks so that there is no more than 34" a.f.f. at the top and there is a minimum of 27" knee clearance at the sink with guarded, wrapped, or insulated piping. Cabinet hardware must be operable with a closed fist and not require use of the fingers.  When required, replace the stove with one that has the controls on the front and not on the back.	2  2  2	2  3  2	I  N  L	\$0 to \$200  Up to \$5,000  \$750
<b><u>Boy's Locker Room #129 and Middle School Football Lockers</u></b> Benches are too narrow and lack back support. Lockers have coat hooks and shelving that are not within reach range. Doors lack tactile designation signage and have knob-style hardware. Student showers have a 5" abrupt change in level surface to enter or are too narrow (20" clear width) and lack accessible features. The office showers are 32" x 35" and not accessible. Bathrooms are also wholly non-compliant as the sink piping is not wrapped, guarded, or insulated; faucets require pinching or twisting of the wrist; dispensers, coat hooks, and mirrors are too high; toilet paper dispensers are too close to the water closets; the water closets are too low and do not meet near side, far side, and front clear width requirements; the water closets lack grab bars; and urinals are too high.  <a href="#">See Photos NMS 27 and 28.</a>	222 803 304 903 308 213 603 604 605 606 609 608 610	30 31 33.2 19.4	Option #1: Close the lockers for public and student use.  Option #2: If vertical platform lifts are installed to provide an accessible route of travel to the locker rooms, then the locker rooms and bathrooms would need to be modified as follows:  At least one, but not less than 5% of the lockers must be accessible have locking/opening devices that are operable with closed fist and mounted no more than 42" a.f.f. (222; 19.4). Hooks and shelves must be between 40" and 48" a.f.f. (2010 ADA Standards 803.5).  Accessible benches must be provided for the accessible lockers. Seats must be a minimum of 42" long and 20" to 24" deep with back support or affixed to a wall. The back support s/b 42" long minimum from a point 2" above the seat surface to a point 18" above the seat surface. The bench height s/b 17" to 19" a.f.f. A minimum 36" clear width must be maintained between the benches and lockers and around the lockers. In addition, a 5' turning diameter must be maintained near the accessible lockers. (903; 19.4).  At least one accessible shower must be provided in each locker room (222; 31). The showers must be on an accessible route and must comply w/S. 608 of the 2010 ADA Standards and S. 31 of 521 CMR. Shower compartments must be either a transfer type shower (36" x 36" w/a 48" clearance), standard roll-in type shower (30" x 60"), or an alternative roll-in type shower (36" x 60"). A folding or non-folding seat must be provided in transfer type showers (608.4; 31). Grab bars must be between 33" and 36" (608.3; 31) and controls must comply with operable parts (no twisting of wrist, use w/closed fist) and should include an adjustable shower spray unit (608.5; 31). There can be no greater than a ½" beveled (maximum 1:2 slope) lip at the shower entrance (608.7; 31).  Sinks, urinals, water closets, and related elements will need to be modified in accordance with the standards detailed in Table 1.	2,3  2,3	1  3	I  L	\$0  Up to \$200K+

<p><u>Boy's and Girl's Lockers Off Gym</u></p> <p>The locker benches are too narrow and lack back support. Lockers have coat hooks and shelving that are not within reach range. There is insufficient clear width around the benches. The interior rooms/offices lack tactile designation signage. Showers lack accessible features. The sinks lack compliant knee clearance and the piping is not wrapped, guarded, or insulated. The mirrors and dispensers are too high. The Boy's urinal is 7" too high. The water closet stall doors open in and not out; are not self-closing; lack pull devices; lack coat hooks; have toilet paper dispensers that are too far from the water closet; and have water closets that are too low, do not meet far side and front clear widths, and lack grab bars. The air dryer in the Girl's locker room is a protruding object. The Boy's and Girl's PE offices include 32" x 32" non-compliant and inaccessible (6" abrupt change in level surface) showers as well as non-complaint bathrooms with sink piping that is not wrapped and faucets that require pinching and twisting of the wrist; mirrors and dispensers that are too high; toilet paper dispensers that are too far from the water closets; and water closets that are too low, do not meet near/far/front clear widths, and lack grab bars.</p> <p>See Photos NMS 29 and 30.</p>	<p>222 803 304 903 308 213 603 604 605 606 609 608 610 307.2</p>	<p>30 31 33.2 19.4 20.6.1</p>	<p>At least one, but not less than 5% of the lockers must be accessible have locking/opening devices that are operable with closed fist and mounted no more than 42" a.f.f. (222; 19.4). Hooks and shelves must be between 40" and 48" a.f.f. (2010 ADA Standards 803.5).</p> <p>Accessible benches must be provided for the accessible lockers. Seats must be a minimum of 42" long and 20" to 24" deep with back support or affixed to a wall. The back support s/b 42" long minimum from a point 2" above the seat surface to a point 18" above the seat surface. The bench height s/b 17" to 19" a.f.f. A minimum 36" clear width must be maintained between the benches and lockers and around the lockers. In addition, a 5' turning diameter must be maintained near the accessible lockers. (903; 19.4).</p> <p>At least one accessible shower must be provided in each locker room (222; 31). The showers must be on an accessible route and must comply w/S. 608 of the 2010 ADA Standards and S. 31 of 521 CMR. Shower compartments must be either a transfer type shower (36" x 36" w/a48" clearance), standard roll-in type shower (30" x 60"), or an alternative roll-in type shower (36" x 60"). A folding or non-folding seat must be provided in transfer type showers (608.4; 31). Grab bars must be between 33" and 36" (608.3; 31) and controls must comply with operable parts (no twisting of wrist, use w/closed fist) and should include an adjustable shower spray unit (608.5; 31). There can be no greater than a ½" beveled (maximum 1:2 slope) lip at the shower entrance (608.7; 31). A fixed object should be placed under the air dryer in the Girl's bathroom for cane detection.</p> <p>Sinks, urinals, accessible stalls, water closets, and related elements will need to be modified in accordance with the standards detailed in Table 1. Adult Bathroom Facilities Compliance Requirements.</p>	<p>2,3</p>	<p>3</p>	<p>L</p>	<p>Up to \$200K+</p>
<p><u>Faculty/Staff and Student Bathrooms</u></p> <p>The staff bathrooms have varying levels of non-compliance including doors with excessive operating forces and too fast closing speeds, sinks that are too low; sink piping that is not wrapped or insulated and have faucets that require pinching or twisting of the wrist; dispensers, coat hooks, mirrors, and light switches that are too high; stall doors that open in, are not self-closing, and lack pull devices; improperly mounted toilet paper dispensers; water closets that are too high or low, have flush controls on the wrong side, and do not meet setback requirements; the lack of grab bars or grab bars at the incorrect height and location; and the lack of audible and visual alarms, among other areas of non-compliance. The items of non-compliance are detailed in Table 2: Northbridge Middle School Staff and Student Bathrooms.</p> <p>See Photos NMS 31, 32, 33, and 34.</p>	<p>703.4 404.2.8 404.2.9 404.2 604 308 609 306 606 605 603</p>	<p>41 26.8 26.9 30</p>	<p>The bathrooms will need to be modified in accordance with the standards detailed in Table 1. Adult Bathroom Facilities Compliance Requirements.</p>	<p>3</p>	<p>2,3</p>	<p>L</p>	<p>TBD - up to \$200K+</p>

TBD - Up to \$1,648,400+

**Table 1. Adult Bathroom Facilities Compliance Requirements**

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

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

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

**Table 2: Northbridge Middle School Staff and Student Bathrooms**

Compliance Item	Boy's at Lower Lockers	Girl's at Lower Lockers	Lobby Women's	Lobby Men's	Blue Main Girl's	Blue Main Boy's	Blue Main Unisex	Girl's House 1
Door width 32"							No	
Tactile signage								
Tactile signage on latch side			No	No			3	
Signage has Univ. Symbol of Access								
Beveled threshold < ½"								
Closing > 6 seconds	No	No	No	No	No	No	No	No
Door force < 5 lbs	No	No	No	No	No	No	No	No
Light switch not > 48" a.f.f.	No	No					No	
Audio-visual alarms present	No	No	No	No	No	No	No	No
Sink not > 34" at rim/counter								
Sink at least 27" knee clearance			No	No				
Sink piping insulated			No	No	No	No	No	No
Sink depth not > 6½"								
Faucets operable w/closed fist						No	No	
Faucets < 5 lbs force								No
Metered faucets on for 10 sec								No
Mirror not > 40" a.f.f.	No	No			No		No	
Soap not > 42" a.f.f.					No	No	No	No
Towel not > 42" a.f.f.			No			No	No	
Protruding object			1, 2					
Urinal not > 17" a.f.f.						No		
At least 29" between urinal shields								
Stall door at least 32" clear width								
Stall door opens out not in			No	No	No	No		No
Stall door is self-closing				No	No	No		No
Stall door has interior pull			No	No		No		No
Stall door has exterior pull			No			No		
Stall door has compliant locking mechanism						No		No
Coat hook is not > 48" a.f.f.			No	No		None		None
Toilet 18" o.c. near					No		No	
Toilet at least 42" o.c. far					No	No	No	
Toilet at least 42" front					No		No	
Toilet 17"-19" a.f.f. rim				No			No	
Flush valve on approach side		No	No					No
TP dispenser 7"-9" o.c. to front			No	No	No	No		No
TP dispenser at least 24" a.f.f.								
TP dispenser mounted on side wall								
TP dispensers below grab bars	No					No		No
Side grab bar 42" long					None		None	
Rear grab bar 42" long					None		None	
Side grab bar 33"-36" a.f.f.	No	No	No	No		No		No
Rear grab bar 33"-36" a.f.f.	No	No		No		No		No
Side grab bar 12" max from interior corner								
Rear grab bar 6" max from interior corner								
Other								
Other								

**Comments:**

- 1 – Air dryer 6" protrusion at 42" a.f.f.
- 2 – Support brace 72" a.f.f. (reduced headroom)
- 3 – Signage denotes as "accessible", but bathroom is not accessible.

**Table 2: Northbridge Middle School Staff and Student Bathrooms continued**

Compliance Item	Boy's House 1	Staff at #232	Men's at Teachers Lounge	Women's at Teachers Lounge	Girl's near #239	Boy's near #239	Main Office	Nurse's Office
Door width 32"							No	
Tactile signage							None	
Tactile signage on latch side								
Signage has Univ. Symbol of Access								
Beveled threshold < ½"								
Closing > 6 seconds	No	No	No	No	No	No		
Door force < 5 lbs	No	No	No	No	No	No		
Light switch not > 48" a.f.f.			No	No	No	No		
Audio-visual alarms present	No	No	No	No	No	No	No	No
Sink not > 34" at rim/counter								
Sink at least 27" knee clearance								
Sink piping insulated	No	No	No	No	No	No	No	No
Sink depth not > 6½"								
Faucets operable w/closed fist	No				No			No
Faucets < 5 lbs force								
Metered faucets on for 10 sec								
Mirror not > 40" a.f.f.					No		No	
Soap not > 42" a.f.f.	No			No - 5	No		No	
Towel not > 42" a.f.f.					No		No	No
Protruding object				4	6	8		
Urinal not > 17" a.f.f.			No			No		
At least 29" between urinal shields								
Stall door at least 32" clear width								
Stall door opens out not in	No					No		
Stall door is self-closing	No		No	No	No	No		
Stall door has interior pull	No		No	No		No		
Stall door has exterior pull	No		No	No	No	No		
Stall door has compliant locking mechanism			No	No	No - 7	9		
Coat hook is not > 48" a.f.f.	None		None	None	Broken	None	No	
Toilet 18" o.c. near						No	No	
Toilet at least 42" o.c. far						No	No	
Toilet at least 42" front					No		No	10
Toilet 17"-19" a.f.f. rim			No	No	No	No	No	No
Flush valve on approach side				No				No
TP dispenser 7"-9" o.c. to front		No	No		No			No
TP dispenser at least 24" a.f.f.				No				
TP dispenser mounted on side wall								
TP dispensers below grab bars	No	No				No		No
Side grab bar 42" long					None		None	
Rear grab bar 42" long					None		None	
Side grab bar 33"-36" a.f.f.	No	No	No	No		No		No
Rear grab bar 33"-36" a.f.f.	No	No	No	No		No		No
Side grab bar 12" max from interior corner								
Rear grab bar 6" max from interior corner								
Other								
Other								

**Comments:**

4 – Towel dispenser 8" protrusion at 42" a.f.f.

6 – Towel dispenser 9½" protrusion at 43" a.f.f.

8 – Towel dispenser 8½" protrusion at 41" a.f.f.

10 – Cabinet restricts front clearance to 30" (remove cabinet)

5 – Sanitary dispenser at 56" a.f.f.

7 – Requires pinching; improperly installed, locks from outside, not from inside the stall

9 – Partition missing in accessible stall, no privacy for stall user



**Table 2: Northbridge Middle School Staff and Student Bathrooms continued**

Compliance Item	#228 Classroom	Level 3 Girl's	Level 3 Boy's	Level 3 Staff				
Door width 32"								
Tactile signage								
Tactile signage on latch side								
Signage has Univ. Symbol of Access								
Beveled threshold < ½"	No							
Closing > 6 seconds			No					
Door force < 5 lbs		No	No					
Light switch not > 48" a.f.f.								
Audio-visual alarms present	No	No	No	No				
Sink not > 34" at rim/counter								
Sink at least 27" knee clearance		No						
Sink piping insulated	No	No	No	No				
Sink depth not > 6½"		No						
Faucets operable w/closed fist								
Faucets < 5 lbs force								
Metered faucets on for 10 sec			No					
Mirror not > 40" a.f.f.								
Soap not > 42" a.f.f.		No		No				
Towel not > 42" a.f.f.								
Protruding object	11							
Urinal not > 17" a.f.f.								
At least 29" between urinal shields								
Stall door at least 32" clear width								
Stall door opens out not in		No	No					
Stall door is self-closing		No	No					
Stall door has interior pull		No	No					
Stall door has exterior pull								
Stall door has compliant locking mechanism			No - 12	13				
Coat hook is not > 48" a.f.f.	No	None	None	No				
Toilet 18" o.c. near	No			No				
Toilet at least 42" o.c. far				14				
Toilet at least 42" front								
Toilet 17"-19" a.f.f. rim	No	No		No				
Flush valve on approach side		No		No				
TP dispenser 7"-9" o.c. to front	No	No	No					
TP dispenser at least 24" a.f.f.	No							
TP dispenser mounted on side wall								
TP dispensers below grab bars		No	No	No				
Side grab bar 42" long								
Rear grab bar 42" long								
Side grab bar 33"-36" a.f.f.	No	No	No	No				
Rear grab bar 33"-36" a.f.f.	No	No	No	No				
Side grab bar 12" max from interior corner								
Rear grab bar 6" max from interior corner								
Other								
Other								

**Comments:**

11 – Shelf 14" protrusion at 60½" a.f.f.

12 – Locking device too high at 51" a.f.f.

13 - Locking device too high at 51" a.f.f.

14 - Desk restricts front clearance to 32" (remove desk)

## **Northbridge Middle School Accessibility Assessment Photos**



Photo NMS 1



Photo NMS 2



Photo NMS 3



Photo NMS 4



Photo NMS 5



Photo NMS 6



Photo NMS 7



Photo NMS 8



Photo NMS 9



Photo NMS 10



Photo NMS 11



Photo NMS 12



Photo NMS 13

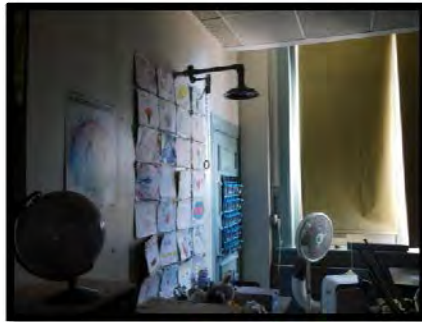


Photo NMS 14



Photo NMS 15

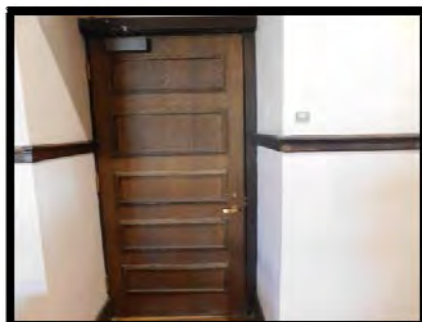


Photo NMS 16





Photo NMS 17

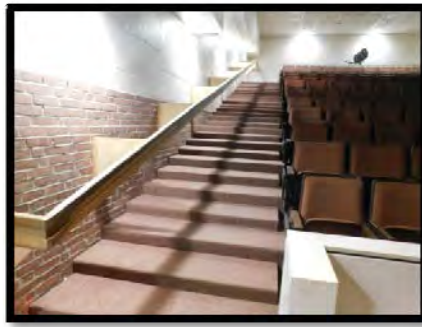


Photo NMS 18



Photo NMS 19



Photo NMS 20

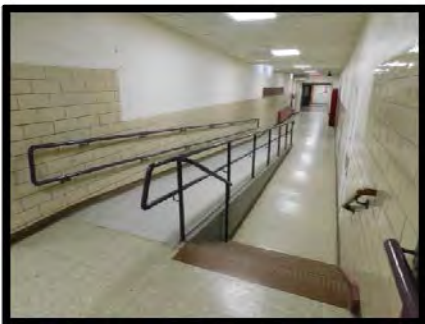


Photo NMS 21



Photo NMS 22

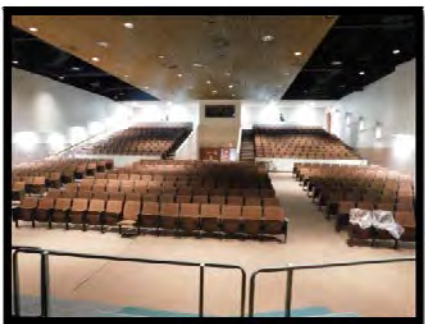


Photo NMS 23



Photo NMS 24



Photo NMS 25



Photo NMS 26



Photo NMS 27



Photo NMS 28

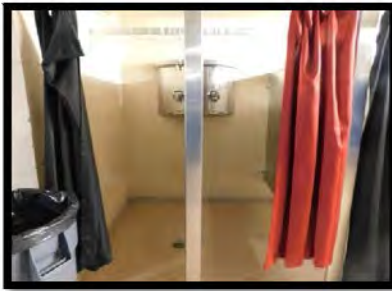


Photo NMS 29

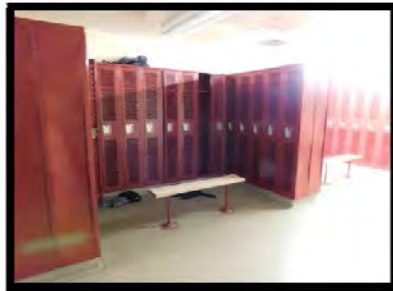


Photo NMS 30



Photo NMS 31

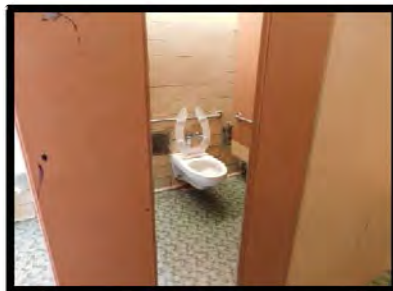


Photo NMS 32

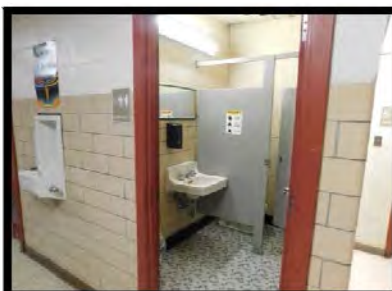


Photo NMS 33

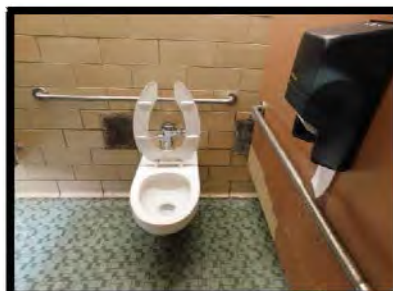


Photo NMS 34

## **NORTHBRIDGE HIGH SCHOOL**

**Description of Facility:** Northbridge High School is a three-story roughly 180,000 square foot masonry structure housing approximately 540 students from grades 9 – 12. The school was substantially completed and dedicated in 2001.



**Responsible Party:** Board of Selectmen and School Department.

**2010 ADA Standards and 521 CMR Standards for Children:** ADA differentiates according to age level whereas 521 CMR differentiates according to grade level. In both cases, adult standards apply to all areas of the building.

### **General Description or Obstacle Which Limits Mobility or Access:**

#### Designated Accessible Parking

None of the designated accessible parking spaces in front of the building are designated as van accessible. Four of the spaces lack signage.

#### Accessible Routes of Travel

The curb ramps from the accessible parking spaces have up to 1" abrupt changes in level surface at the transition from asphalt to concrete due to deterioration. The curb ramp closest to the building has a running slope of up to 9.2%. Roughly 60 feet of the walkway to the front entrance from the accessible parking has a cross slope that varies from 2.3% to 3.4%.

#### Interior Common Areas and General

Interior and exterior doors with closers have operating forces and closing speeds which exceed that allowed. Some doors lack tactile designation signage, some doors have the signage improperly mounted, and some doors have the tactile signage covered. A number of hallway and classroom doors

**Town of Northbridge Accessibility Plan**

have glass panes which are too high. The “RAM stand” and ticket booth counters are too high. Hallway and classroom items such as fire extinguishers, defibrillators, and dispensers are not within reach range. Hallway lockers have shelving and coat hooks that are also not within reach range. Classroom and prep room accessible sinks typically had items stored in the knee clearance area under the sink restricting wheelchair use. All items should be removed from beneath the accessible sinks. One of the book stacks in the media center has a clear width that is less the minimum required.

Typically the desks and tables throughout the school did meet knee clearance and table/desk top height requirements, but in those instances where they did not (Room A212 for example), the tables/desks could be adjusted and raised as needed or adjustable/compliant desks could be brought into a classroom to address an accommodation. Fixed seating in the science labs did not always meet compliant knee clearance. If blocking is not feasible, it may be necessary to bring in a portable table or desk as a reasonable accommodation if required.

#### Science Labs

Only one of the seven science class rooms has a student sink that is at the correct rim height and meets the minimum required knee clearance. All of the student sinks have non-compliant hardware that requires pinching and twisting of the wrist. The teacher classroom sinks and prep room sinks have piping that is not fully wrapped and lack compliant faucet hardware.

#### Auditorium

The auditorium provides fixed seating for 317 persons, which is to include accommodation for a minimum of 6 wheelchairs (with companion seats) dispersed throughout the place of assembly. In addition, a minimum of 1% of the fixed seating must be aisle seats with no armrests on the aisle side or have removable or folding armrests. These seats must be identified by a sign or marker. In addition, signage must be posted notifying patrons of the availability of such seating.

The auditorium meets or exceeds the minimum standards for dispersed wheelchair spaces as well as the armless or folding armrest seats. However, only one of the aisle seats with a folding armrest has designation signage and no signage is posted notifying patrons the availability of such seating.

The stairs to the stage and to the control booth from the assembly area have railings that are ½” too wide and up to 3” too high. Although the stair railings lack bottom extensions, if provided, they would serve as an obstruction as well as a potential protruding object, so therefore, no extension modifications are required.

The control booth window overlooking the theater is 45” a.f.f. and not within sight/viewing range of a wheelchair user.

#### Locker Rooms

The boy’s and girl’s locker rooms have benches that are not wide enough, lack back support or are not affixed to a wall, and have insufficient clear width around the benches. The “accessible” showers lack a folding seat and a sliding spray shower unit.

#### Staff and Student Bathrooms

The bathrooms have varying levels of non-compliance including coat hooks, dispensers, and mirrors that are too high; sink piping that is not fully wrapped; metered sink faucets with excessive operating force and which do not stay open for at least 10 seconds; toilet paper dispensers that are improperly



mounted; men's urinals that are too high; and items placed next to the water closet that restrict clear width. In addition, student bathrooms with stalls have stall doors that open in not out, are not self-closing, lack interior and/or exterior pull devices, and have coat hooks that are too high.

### Kitchen and Receiving

The kitchen area itself has numerous elements of non-compliance (bathroom, reach ranges, knee clearances, clear widths, etc.) but most of the activities undertaken require personnel who must meet certain physical requirements to perform the essential functions of their position. Therefore, no further action is required at the present time unless dictated by a request for a reasonable accommodation. Similarly, the Receiving lockers have shelving and coat hooks that are too high, but personnel must meet certain physical requirements to perform their duties. Therefore, no further action is required on the lockers unless dictated by a request for a reasonable accommodation.

## **Northbridge High School Accessibility Assessment**

<b>General Description of Obstacle</b>	<b><u>2010 ADAAG</u></b>	<b><u>MAAB 521 CMR</u></b>	<b><u>Type of Action to be Taken</u></b>	<b><u>P</u></b>	<b><u>F</u></b>	<b><u>TF</u></b>	<b><u>Cost Estimate</u></b>
<b><u>Designated Accessible Parking</u></b> Four of the eight parking spaces lack signage. None of the spaces are designated as van accessible.  See Photo NHS 1.	502.6	23.6	Provide accessible signage at the 4 spaces lacking signage. 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" at the top (MAAB 521 CMR) and located no more than 10' in front of the space.  Van accessible signage should be provided at the 2 eight foot wide spaces with a shared eight foot wide access aisle closest to the building.	1	2	I	\$125
<b><u>Exterior Accessible Routes</u></b> The transition from the asphalt parking to the concrete curb ramps all have abrupt changes in level surface of up to 1" due to deterioration and heaving.  The curb ramp closest to the building has a running slope of up to 9.2%.  The concrete accessible route of travel along the side of the building to the main entrance has a cross slope of 2.3% to 3.4% for a distance of approximately 60 feet.  See Photo NHS 2.	303.2 303.4  405.2  403.3	21.4  21.2  22.3.1	Modify the curb ramp transitions such that there is no greater than a ¼" or no greater than a ¼" to ½" beveled transition with a slope no greater than 1:2.  Modify the curb ramp so that the running slope is no greater than 8.3%.  Modify the walkway so that the cross slopes do not exceed 2.0%.	1  1  1	3  3  3	N  N  N	Up to \$1,000  Up to \$1,500  Up to \$5,000
<b><u>Exterior and Interior Doors</u></b> Exterior and interior doors with closers (including bathrooms) do not fully comply with the maximum allowed operating force for an exterior door (15 lbs.), interior door (5 lbs.) and minimum closing speed requirement of 6 seconds under 521 CMR. Assessments ranged from 3 to 4 seconds closing speed and up to 20 lbs. operating force.	404.2.8 404.2.9	26.8 26.9	Adjust door closers such that the push/pull force does not exceed 15 lbs for an exterior door and 5 lbs. for an interior door with door closing speeds of at least 6 seconds.	1, 3	2	I	\$0



<p><b>Door Signage</b></p> <p>Tactile designation signage is not provided at the following locations:</p> <p><u>Level 1</u></p> <ul style="list-style-type: none"> <li>• Men's locker room by exit</li> <li>• Women's locker room closest to lobby</li> <li>• Side egress from theater across from Nurse (2)</li> <li>• Stage egress across A133/A144</li> <li>• Theater egress (4) in A148 corridor</li> <li>• A151 Tech double doors</li> <li>• A154</li> <li>• C108</li> <li>• Staff men and women's bathrooms in C131 corridor</li> <li>• No signage to principal from front office</li> <li>• No signage to nurse's office from admin</li> <li>• Nurse door to guidance</li> <li>• No signage to Guidance from hallway</li> <li>• Field house storage (2)</li> <li>• Field house exits (4)</li> <li>• F108 girl's locker storage</li> <li>• F108 doors to lockers (2)</li> <li>• Boy's doors to lockers(2)</li> <li>• Level 1 egress doors</li> <li>• A168 exit to hallway</li> <li>• A154 exit door</li> <li>• Classroom pass-through doors</li> <li>• Doors behind auditorium stage (8)</li> </ul> <p><u>In addition</u>, the Admin gender neutral bathrooms Braille is covered (2) and there is no Universal Symbol of Accessibility; the Nurse Braille signage is blocked, the A110 office signage is not on latch side, the Nurse gender neutral bathrooms (2) Braille is covered and there is no Universal Symbol of Accessibility.</p> <p><u>Level 2</u></p> <ul style="list-style-type: none"> <li>• Double doors to receiving</li> <li>• F202 to F206</li> <li>• Balcony egress doors to stairs</li> <li>• A214 storage</li> <li>• A201 double doors</li> <li>• A204 /Library (1)</li> <li>• C223 2<sup>nd</sup> door</li> <li>• Classroom pass-through doors</li> </ul>	703	41.1	<p>Install, replace, and/or relocate accessible compliant designation signage on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Under 521 CMR, signage s/b 60" a.f.f. to the centerline of the sign. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).</p> <p>Remove items/paper that is blocking the signage.</p>	2	2,3	I	Up to \$10,625
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<p><u>In addition</u>, the Receiving bathroom signage is not on the latch side, Cafeteria (2) and Teacher Dining (2) gender neutral bathrooms Braille is covered and there is no Universal Symbol of Accessibility.</p> <p><u>Level 3</u></p> <ul style="list-style-type: none"> <li>• C326</li> <li>• Storage next to C314</li> <li>• Room next to C303</li> <li>• Classroom pass-through doors</li> <li>• Door to roof</li> </ul> <p><u>In addition</u>, the C323 Prep Room signage is not on the latch side</p> <p>See Photos NHS 3, 4, and 5.</p>							
<p><b>Doors with Glass Panes</b></p> <p>Hallway and room doors have glass panes that are up to 49" a.f.f.</p> <p>See Photo NHS 6.</p>	404.2.11	NA	<p>Doors, gates, and side lights adjacent to doors or gates, containing panels that permit viewing through the panels shall have the bottom of at least one panel located 43 inches maximum a.f.f. <i>Note: This does not apply to doors with adjacent side lights that are below 43" to allow for viewing.</i></p> <p>Frost or block the glass panes.</p>	4	2	N	\$0
<p><b>Accessible Hallway Lockers</b></p> <p>The Level 1 (279), Level 2 (296), and Level 3 (324) lockers have shelving that is up to 19" too high and coat hooks that are up to 16" too high.</p>	308.2 308.3	6.5 6.6	<p>At least 5% of the lockers per Level, or as required, should have shelving and coat hooks within reach range at a height of no more than 48" a.f.f. Lower the shelving and hooks as necessary.</p>	4	2	I	\$0
<p><b>Protruding Objects</b></p> <p><u>Level 1</u></p> <ul style="list-style-type: none"> <li>• Fire extinguisher near A151 (7" protrusion at 32" a.f.f)</li> <li>• Field house chin-up bar (14½" protrusion at 77" a.f.f)</li> <li>• Boy's and Girl's locker room fire extinguisher (7" protrusion at 32" a.f.f)</li> <li>• Boy's locker room clock (5½" protrusion at 72" a.f.f)</li> </ul> <p><u>Level 2</u></p> <ul style="list-style-type: none"> <li>• Defibrillator across from cafeteria (7" protrusion at 34" a.f.f)</li> <li>• Kitchen fire extinguishers (7" protrusion at 34" a.f.f.)</li> </ul> <p>Protruding objects extend more than 4" into the accessible route of travel between a height of 27" and 80" a.f.f. or have vertical headroom clearance reduced to less than 80".</p> <p>See Photo NHS 7.</p>	307.2	20.6.1	<p>Relocate fire extinguishers so they are not on an accessible route of travel or place a fixed object below. Place fixed objects below the clock and defibrillator and at each end of the chin-up bar for cane detection.</p>	2	2	I	\$0

<b><u>Reach Range</u></b> The following exceed the maximum reach range height for an adult under the 2010 ADA Standards: <ul style="list-style-type: none"> <li>Defibrillator near Admin Office (60" a.f.f.)</li> <li>Field House hand sanitizer (54 ½")</li> <li>A133 Drama towel (52" a.f.f.) and soap (56" a.f.f.) dispensers</li> <li>Room C122 fire blanket (52" a.f.f.)</li> <li>Room C122 towel dispenser (50" a.f.f.)</li> <li>Room C122 microwave ovens (62" a.f.f.)</li> <li>Room C122 oven controls (55" a.f.f.), handle (50" a.f.f.)</li> <li>Room C126 fire blanket (52" a.f.f.)</li> <li>A222 soap dispenser (50" a.f.f.)</li> <li>A201 towel dispenser (49" a.f.f.)</li> <li>Room C325 soap dispenser (50" a.f.f.)</li> </ul> See Photos NHS 8 and 9.	308.2 308.3	6.5 6.6	The maximum reach range is 48" a.f.f. under the 2010 Standards.  Items (dispensers, sanitizers, fire alarms, life saving blankets, etc.) need to be lowered to a height of no more than 48" a.f.f.  A microwave oven s/b placed on a counter within reach range in Room C122 as required upon a reasonable accommodation request.  The oven s/b be replaced with one that has both the controls and handle within the maximum 48" reach range as required upon a reasonable accommodation request.	2, 4	2	N	\$0 to TBD
<b><u>Counters</u></b> The "Ram Stand" and ticket counters are 42¼" to 42½" a.f.f.	904.4	7.2	Modify or add a 36" long by no more than 36" high a.f.f. counter, with a minimum of 27" of knee clearance.	2	3	N	Up to \$500
<b><u>Boy's and Girl's Locker Rooms</u></b> The showers lack a folding bench and a sliding shower head and hose.  Each locker room has 4 separate locker/bench areas. There is only 12" to 30" of clear width between the lockers and benches. The benches lack back support and are only 9½" wide.  See Photo NHS 10 and 11.	608  903	31  19.4	Install folding seats and sliding shower heads and hoses.  For at least one of each of the locker rooms, there must be a 36" accessible route to and around the lockers as well as a 5 foot turning diameter near the accessible locker(s). At least one accessible bench must be provided. The bench seat must be a minimum of 42" long and 20" to 24" deep with back support or affixed to a wall. The back support s/b 42" long minimum from a point 2" above the seat surface to a point 18" above the seat surface. The bench height s/b 17" to 19" a.f.f.	2  2	3  3	N  N	Up to \$2,000+  Up to \$2,000+
<b><u>Library</u></b> The stack clear width between Classics Historical Fiction and Graphic Novels is only 34".	403.5	12.2 20.3	Move the stacks to achieve the required minimum 36" clear width.	2	2	I	\$0
<b><u>Auditorium</u></b> Only 1 of the 8 armless seats has a "Universal Symbol of Accessibility" on the side of the armrest.  Stairs to the stage and to the control booth have railings that are 2½" wide and are 40" to 41" a.f.f. to the top of the gripping surface. The stair railings also lack bottom extensions, but as they would serve as an obstruction, extensions are not required.	802.4  505.4 505.7.2	14.2.1  27.4.2 27.4.4	Provide compliant signage on each seat with a foldable armrest.  Modify or replace the railings so they are 1¼" to 2" in outside diameter and 34" to 38" a.f.f. to the top of the railings.	2  2	2  3	I  N	Up to \$100  Up to \$15,000+

Although signage is provided in the control booth noting that an Assistive Listening System is available, no such signage is posted in public areas in or outside the auditorium.  <a href="#">See Photo NHS 12.</a>	219 706	14.5	If audio amplification is provided, then an ASL must be provided. Based on the seating in the auditorium, a total of 13 receivers are required, 4 of which must be hearing-aid compatible. In addition, signage must be provided to notify patrons of the availability of a listening system. Such signage must include the International Symbol of Access for Hearing Loss (703.7.2.4; 14.5.4, 41.10).	2	3	N	Up to \$10,000+
<b><u>Science Rooms #304, 305, 309, 308, 320, 324, 325</u></b> Classrooms #304 308, 320, and 324 have work stations with sink piping that is not fully wrapped and which have faucets that require pinching and twisting of the wrist.  Classrooms #325 309, and 305 have work stations that are 2" too high and provide only 22" of clear width, which is 8" too narrow. In addition, faucets require pinching and twisting of the wrist.  The teacher classroom sinks are 2" too high, have sink piping that is not fully wrapped, and faucets that require pinching and twisting of the wrist. The prep room sinks have sink piping that is not fully wrapped, and faucets that require pinching and twisting of the wrist.  <a href="#">See Photo NHS 13 and 14.</a>	306 309 606 902	32 35	Replace sink faucets with ones that can be operable with a closed fist or loose grip. Fully wrap, guard, or insulate the sink piping. Purchase 1 portable ADA Accessible Portable Science Lab for student and teacher use as may be required ( <a href="#">See Photo NHS 14</a> ).	2	1	N	Up to \$4,500+
<b><u>Faculty/Staff and Student Bathrooms</u></b> The staff bathrooms have varying levels of non-compliance including doors with excessive operating forces and too fast closing speeds, sink piping that is not wrapped or insulated and have metered faucets that require more than 5 lbs. to operate and do not stay open for at least 10 seconds; dispensers, coat hooks, and mirrors that are too high; stall doors that open in, are not self-closing, and lack pull devices; improperly mounted toilet paper dispensers; and water closets that do not meet setback requirements among other areas of non-compliance. The items of non-compliance are detailed in Table 2: Northbridge High School Staff and Student Bathrooms.  <a href="#">See Photos NHS 15, 16, 17 and 18.</a>	604.3 604.2 609 604.7 604.8 404.2 606.5 309.4 606.4 603.3 308 307.2 604.5	30.9.5 30.9.6 30.11 30.12 20.6.1 30.6.1 30.7.2 30.8 30.7.6 30.8.5	The bathrooms will need to be modified in accordance with the standards detailed in Table 1. Adult Bathroom Facilities Compliance Requirements.	3	2,3	L	Up to \$1,000+

Up to \$1000+

**Table 1. Adult Bathroom Facilities Compliance Requirements**

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

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

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



**Table 2: Northbridge High School Staff and Student Bathrooms**

Compliance Item	Admin Left	Admin Right	Nurse Left	Nurse Right	Men's by Lockers	Women's by Lockers	Gil's Locker Bathrooms	Boy's Locker Bathrooms
Door width 32"								
Tactile signage								
Tactile signage on latch side								
Signage has Univ. Symbol of Access								
Beveled threshold < ½"								
Closing > 6 seconds								
Door force < 5 lbs								
Light switch not > 48" a.f.f.								
Audio-visual alarms present								
Sink not > 34" at rim/counter						No		
Sink at least 27" knee clearance								
Sink piping insulated	No	No	No	No			No	
Sink depth not > 6½"								
Faucets operable w/closed fist								
Faucets < 5 lbs force	No	No	No	No	No	No	No	No
Metered faucets on for 10 sec	No	No	No	No	No	No	No	No
Mirror not > 40" a.f.f.	No	No	No	No				
Soap not > 42" a.f.f.	No	No	No	No				
Towel not > 42" a.f.f.	No	No	No	No			No	No
Protruding object					Yes - 2			
Urinal not > 17" a.f.f.					No			
At least 29" between urinal shields								
Stall door at least 32" clear width								
Stall door opens out not in					No	No		
Stall door is self-closing					No	No	No	No
Stall door has interior pull					No	No	No	No
Stall door has exterior pull					No	No		
Stall door has compliant locking mechanism								
Coat hook is not > 48" a.f.f.	No	No	No	No	No	No	No	No
Toilet 18" o.c. near				No		No		
Toilet at least 42" o.c. far						No		
Toilet at least 42" front	No - 1							
Toilet 17"-19" a.f.f. rim								
Flush valve on approach side								
TP dispenser 7"-9" o.c. to front		No		No	No	No	No	No
TP dispenser at least 24" a.f.f.							No	No
TP dispenser mounted on side wall								
TP dispensers below grab bars								
Side grab bar 42" long								
Rear grab bar 42" long								
Side grab bar 33"-36" a.f.f.								
Rear grab bar 33"-36" a.f.f.								
Side grab bar 12" max from interior corner								
Rear grab bar 6" max from interior corner								
Other								
Other								

**Comments:**

1. Book cabinet reduces clearance to only 36½". Remove the cabinet.
2. Air dryer is 43" a.f.f. with a 6" protrusion.

**Table 2: Northbridge High School Staff and Student Bathrooms continued**

Compliance Item	CR #126	L1 Corridor Girl's	L1 Corridor Women	L1 Corridor Boy's	L1 Corridor Men	Kitchen Bathroom	Cafeteria Left	Cafeteria Right
Door width 32"								
Tactile signage								
Tactile signage on latch side								
Signage has Univ. Symbol of Access								
Beveled threshold < ½"								
Closing > 6 seconds								
Door force < 5 lbs								
Light switch not > 48" a.f.f.								
Audio-visual alarms present								
Sink not > 34" at rim/counter								
Sink at least 27" knee clearance								
Sink piping insulated	No				No - 6			No - 6
Sink depth not > 6½"								
Faucets operable w/closed fist								
Faucets < 5 lbs force	No	No	No	No	No	No	No	No
Metered faucets on for 10 sec	No	No	No	No	No	No	No	No
Mirror not > 40" a.f.f.			No		No	No	No	No
Soap not > 42" a.f.f.			No		No	No	No	No
Towel not > 42" a.f.f.		No	No	No	No	No	No	No
Protruding object								
Urinal not > 17" a.f.f.								
At least 29" between urinal shields								
Stall door at least 32" clear width								
Stall door opens out not in		No		No				
Stall door is self-closing		No						
Stall door has interior pull		No		No				
Stall door has exterior pull		No		No				
Stall door has compliant locking mechanism								
Coat hook is not > 48" a.f.f.		No	No	No	No	No		
Toilet 18" o.c. near	No		No					
Toilet at least 42" o.c. far	No - 3					No - 7		
Toilet at least 42" front			No - 5					
Toilet 17"-19" a.f.f. rim	No							
Flush valve on approach side								
TP dispenser 7"-9" o.c. to front	No			No	No	No	No	No
TP dispenser at least 24" a.f.f.			No					
TP dispenser mounted on side wall	No - 4							
TP dispensers below grab bars								
Side grab bar 42" long	No							
Rear grab bar 42" long	No							
Side grab bar 33"-36" a.f.f.	No							
Rear grab bar 33"-36" a.f.f.	No							
Side grab bar 12" max from interior corner								
Rear grab bar 6" max from interior corner	No							
Other								
Other								

**Comments:**

3. Closet restricts clear width to 25". Remove the closet.
4. Toilet paper dispenser 49" a.f.f. and located on the wall in front of the water closet.
5. A cart restricts clear width to 33". Remove the cart.
6. Shut-offs not fully wrapped.
7. A waste basket reduces the clear width to 0". Remove the waste basket.

**Table 2: Northbridge High School Staff and Student Bathrooms continued**

Compliance Item	A222 Left	A222 Right	L2 Corridor Girl's	L2 Corridor Women	L2 Corridor Boy's	L2 Corridor Men	L1 Women Corridor Alt. Acc. Stall	L2 Receiving BR
Door width 32"							No	
Tactile signage								
Tactile signage on latch side								
Signage has Univ. Symbol of Access								
Beveled threshold < ½"								
Closing > 6 seconds								
Door force < 5 lbs								
Light switch not > 48" a.f.f.								
Audio-visual alarms present								
Sink not > 34" at rim/counter								
Sink at least 27" knee clearance								
Sink piping insulated								
Sink depth not > 6½"								
Faucets operable w/closed fist								
Faucets < 5 lbs force	No	No	No	No		No		
Metered faucets on for 10 sec	No	No	No	No		No		
Mirror not > 40" a.f.f.	No	No		No		No		No
Soap not > 42" a.f.f.	No	No		No		No		No
Towel not > 42" a.f.f.	No	No	No	No	No	No		No
Protruding object								
Urinal not > 17" a.f.f.					No			
At least 29" between urinal shields								
Stall door at least 32" clear width								
Stall door opens out not in			No		No		No	
Stall door is self-closing			No		No		No	
Stall door has interior pull			No		No		No	
Stall door has exterior pull			No		No		No	
Stall door has compliant locking mechanism								
Coat hook is not > 48" a.f.f.			No	No	No	No	None	No
Toilet 18" o.c. near							No - 9	
Toilet at least 42" o.c. far								
Toilet at least 42" front				No - 8				
Toilet 17"-19" a.f.f. rim								
Flush valve on approach side								
TP dispenser 7"-9" o.c. to front		No				No		No
TP dispenser at least 24" a.f.f.			No	No		No		
TP dispenser mounted on side wall								
TP dispensers below grab bars		No						
Side grab bar 42" long								
Rear grab bar 42" long								
Side grab bar 33"-36" a.f.f.								
Rear grab bar 33"-36" a.f.f.								
Side grab bar 12" max from interior corner								
Rear grab bar 6" max from interior corner								
Other								
Other								

**Comments:**

8. Toilet front clearance reduced to 32" due to a file cabinet. Remove the cabinet.
9. Clearance s/b 18" o.c. on both sides. Water closet is 15½" and 18½" o.c. on sides.

**Table 2: Northbridge High School Staff and Student Bathrooms continued**

Compliance Item	L3 Corridor Girl's	L3 Corridor Women	L3 Corridor Boy's	L3 Corridor Men				
Door width 32"								
Tactile signage								
Tactile signage on latch side								
Signage has Univ. Symbol of Access								
Beveled threshold < ½"								
Closing > 6 seconds								
Door force < 5 lbs								
Light switch not > 48" a.f.f.								
Audio-visual alarms present								
Sink not > 34" at rim/counter								
Sink at least 27" knee clearance								
Sink piping insulated								
Sink depth not > 6½"								
Faucets operable w/closed fist								
Faucets < 5 lbs force	No	No	No	No				
Metered faucets on for 10 sec	No	No	No	No				
Mirror not > 40" a.f.f.		No		No				
Soap not > 42" a.f.f.								
Towel not > 42" a.f.f.	No	No	No	No - 11				
Protruding object								
Urinal not > 17" a.f.f.			No					
At least 29" between urinal shields								
Stall door at least 32" clear width								
Stall door opens out not in	No		No					
Stall door is self-closing	No		No					
Stall door has interior pull	No		No					
Stall door has exterior pull	No		No					
Stall door has compliant locking mechanism								
Coat hook is not > 48" a.f.f.	No	No	No	No				
Toilet 18" o.c. near	No							
Toilet at least 42" o.c. far								
Toilet at least 42" front		No - 10						
Toilet 17"-19" a.f.f. rim								
Flush valve on approach side								
TP dispenser 7"-9" o.c. to front	No	No	No	No				
TP dispenser at least 24" a.f.f.	No	No						
TP dispenser mounted on side wall								
TP dispensers below grab bars								
Side grab bar 42" long								
Rear grab bar 42" long								
Side grab bar 33"-36" a.f.f.								
Rear grab bar 33"-36" a.f.f.								
Side grab bar 12" max from interior corner								
Rear grab bar 6" max from interior corner								
Other								
Other								

**Comments:**

10. Front clearance reduced to 32" due to a cabinet. Remove the cabinet.
11. Towel dispenser located partially over the grab bars. Relocate the dispenser.

## Northbridge High School Accessibility Assessment Photos



Photo NHS 1

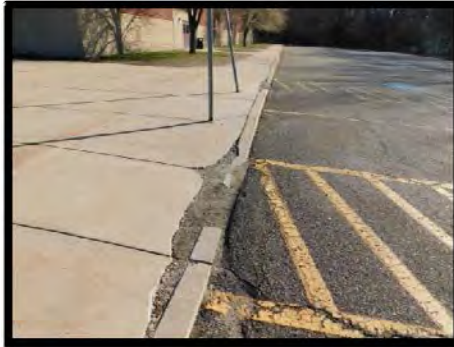


Photo NHS 2



Photo NHS 3



Photo NHS 4



Photo NHS 5

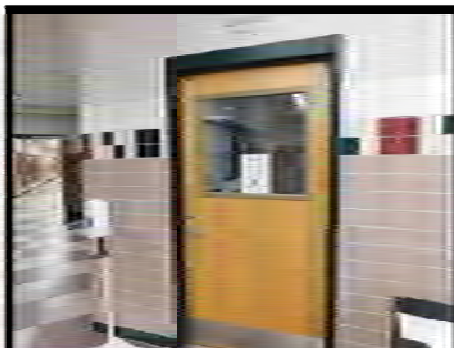


Photo NHS 6



Photo NHS 7

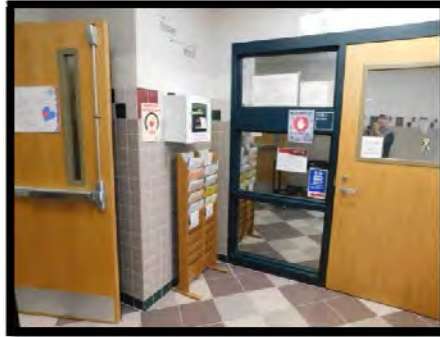


Photo NHS 8

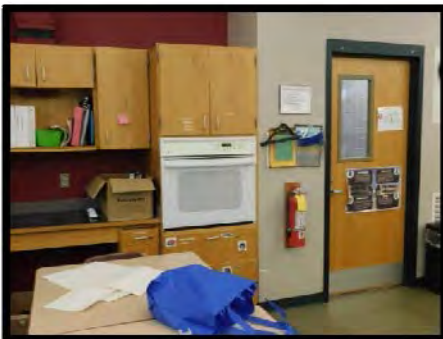


Photo NHS 9

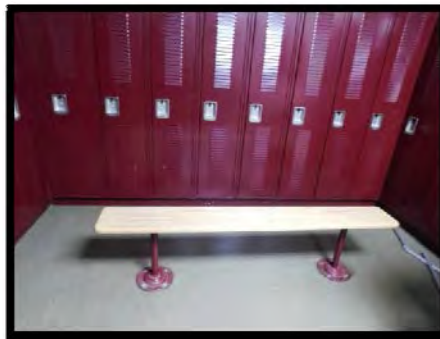


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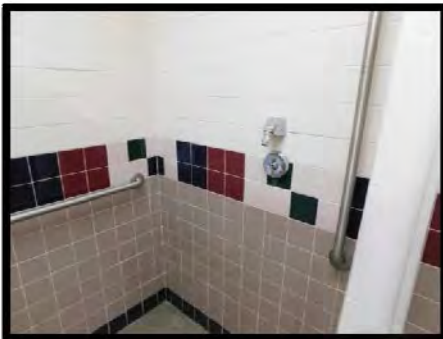


Photo NHS 11



Photo NHS 12



Photo NHS 13



Photo NHS 14



Photo NHS 15



Photo NHS 16

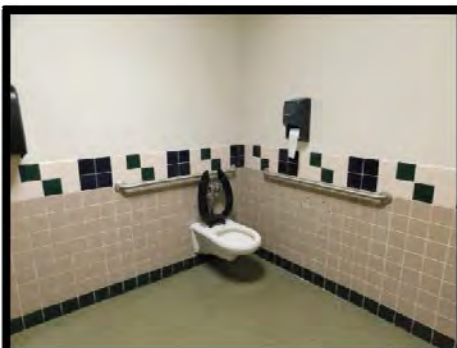


Photo NHS 17

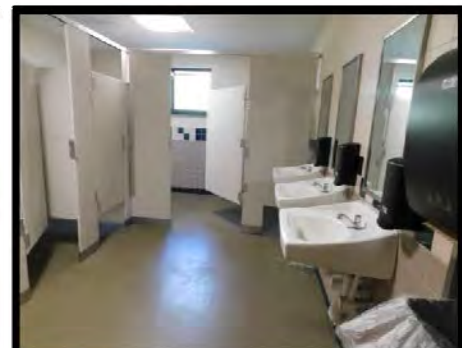


Photo NHS 18



#### **XIV. 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

##### **CONSERVATION/PASSIVE RECREATION AREAS**

TOWN COMMON/MEMORIAL SQUARE

CROSS STREET TOT LOT

PLUMMER PARK

ROCKDALE MEMORIAL PARK

LINWOOD FIELD

ELEMENTARY SCHOOL PLAYGROUND AND FIELDS

LASELL FIELD AND BASEBALL FIELDS

HIGH SCHOOL FIELDS

## **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 in red 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, Northbridge’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 or amenities; or serve solely as wildlife habitat, flood plain, or watershed land. No other action is required at these facilities. This includes the following sites:

- Northbridge Center Field
- Arcade Pond
- Bennet’s Pasture
- Fletcher Street Conservation Land
- Mumford Riverwalk
- Riley Pond
- Shining Rock

#### 2. Passive Recreation Areas

These properties have minimal improvements and/or may serve as assembly areas or green spaces. This includes the following sites:

- Town Common/Memorial Square

#### 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:

- Rockdale Memorial Park
- Linwood Field
- Plummer Park
- Cross Street Tot Lot

#### 4. School Recreational Facilities

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

- Lasell Field and Baseball Fields
- Elementary School Playground and Fields
- High School Fields

### **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.



## **CONSERVATION/PASSIVE RECREATION AREAS**

**Description of Facilities:** Unimproved properties with no formal or limited parking. If parking exists, it is gravel only with no designated parking spaces for any vehicles. Although there are paths and trails at some of these sites, none are formally maintained to a standard that would be considered to be an accessible route of travel. These areas would require modifications to parking (level surface, signage, striping) if the sites are improved, expanded upon, or if amenities such as picnic tables, benches, or grilling areas are added to the facilities. At a minimum, compliant accessible routes of travel (maximum 5.0% running slope without railings, maximum 2.0% cross slope; minimum 4 feet in width with 3 feet of clear space; stable, firm, slip resistant surface; and no greater than ¼" abrupt change in level surface) would need to be provided to the enhanced or added service or amenity. This includes the following sites:

- Northbridge Center Field
- Arcade Pond
- Bennet's Pasture
- Fletcher Street Conservation Land
- Mumford Riverwalk
- Riley Pond
- Shining Rock

Although not required, the town could consider placing a kiosk at those areas that it feels has significant features or amenities with visual examples during the different seasons and information about the specific site and the surrounding area. The kiosk would allow those with mobility limiting disabilities to "view" the conservation area. The sign should also be in Braille for visually impaired visitors. Apart from the above "optional" recommendation, no other action is required at these facilities at the present time.

### **Representative Photos**



Mumford Riverwalk



Mumford Riverwalk



Riley Pond



Riley Pond



Shining Rock



Shining Rock

## **TOWN COMMON/MEMORIAL SQUARE**

**Function and Description of Facility and Programs:** The town common area serves as a passive recreational area, green space, and location for civic events. The town common contains 7 to 8 monuments/memorials, 7 benches, and 2 interpretive signs. Memorial Square contains monuments for those who lost their lives in Wars occurring from 1939 – 1955 and the Vietnam War occurring from 1961 – 1975.



Town Common



Memorial Square

**Responsible Party:** Board of Selectmen

### **General Description or Obstacle Which Limits Mobility or Access:**

#### Town Common

Only one of the dispersed benches is on an accessible route of travel with an accompanying level area for a wheelchair. The Linwood Street interpretive sign lacks a level area and stable surface for a wheelchair to view the sign. There are abrupt changes in level surface on the route of travel to the Civil War Monument. Although the running slopes to access the common exceed 8.3% in all but one of the entry points, the natural topography of the site prevents compliance from occurring, so no further action is required.

#### Memorial Square

Memorial Square is fully accessible and compliant.

## **Town Common/Memorial Square 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>
<b><u>Accessible Route and Benches</u></b> Only one bench is on an accessible route with an accompanying level area for a wheelchair. There are abrupt, unbeveled changes in level surface on the route of travel at the Civil War Monument. There is no accessible route directly to and no level area for a wheelchair at the Linwood Street interpretive signage.	402 303 403	19 20 22 14	Relocate one of the benches on the Linwood Street side to the concrete walkway.  Provide a stone dust walkway and level wheelchair area at the location with the paired benches (See Photo Town Common 1). The wheelchair space should be 36" wide x 60" deep per wheelchair. The accessible route s/b 48" per 521 CMR with a 2% maximum cross slope	2	2	N	Up to \$500+



See Photos Town Common 1, 2, and 3.		<p>and a 5% maximum running slope.</p> <p>Repair/modify the concrete at the Civil War Monument to eliminate the abrupt changes in level surface and to provide a stable surface.</p> <p>Provide a stone dust accessible route and level area for a wheelchair at the Linwood Street side interpretive signage.</p>				
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Total up to \$500+

### **Town Common/Memorial Square Accessibility Assessment Photos**



Photo Town Common 1



Photo Town Common 2



Photo Town Common 3

## **CROSS STREET TOT LOT**

**Function and Description of Facility and Programs:** Cross Street Tot Lot is a small playground located next to the School Administration Building and the former elementary school on Cross Street. In addition to the play equipment, there is a sandbox and a bench.



**Responsible Party:** Northbridge School Department

**General Description or Obstacle Which Limits Mobility or Access:** The chain link gate to enter the playground is not smooth at the base. The walkway from the sidewalk to the playground has a running slope of up to 12.0%. There is no accessible route of travel fully around the entirety of the playground (one side only). There is no accessible route of travel to the play equipment, sandbox, and bench. Non-compliant wood chips are the primary surface throughout the playground. There are no accessible play components.

## **Cross Street Tot Lot Accessibility Assessment**

<b><u>General Description of Obstacle</u></b>	<b><u>2010 ADAAG</u></b>	<b><u>MAAB 521 CMR</u></b>	<b><u>Type of Action to be Taken</u></b>	<b><u>P</u></b>	<b><u>F</u></b>	<b><u>TF</u></b>	<b><u>Cost Estimate</u></b>
<b>Entrance Gate</b> The existing 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.  <a href="#">See Photo Cross Street 1.</a>	404.2.10	NA	Remove gate or install smooth plating at base of gate.	2	2	N	\$100

<p><b><u>Accessible Route of Travel</u></b></p> <p>The accessible route from the sidewalk to the playground has a roughly 35 foot segment with a running slope that varies from 7.0% to 12.0%.</p> <p>There is no accessible route of travel to and fully around the playground and to and between play equipment as well as to the bench and sandbox (up to 9" abrupt change in level surface).</p> <p>Non-compliant woodchips is the surface treatment for the entirety of the play areas. Woodchips may be acceptable in the fall zone area, but not as part of an accessible route of travel.</p> <p>There is no accessible playground equipment in the playground area.</p> <p>See Photos Cross Street 2, 3, and 4.</p>	403	22	<p>An accessible route of travel needs to be provided to all areas available to the public. Construct an accessible route of travel fully to and around the playground area and to and between playground equipment and components including the bench and sandbox. The accessible route of travel must be compliant with width (48" per 521 CMR) and slope (2% max. cross, 5% max. running) requirements as well as changes in level surface (no &gt; than ¼" unbeveled or between ¼" and ½" beveled w/a slope of no &gt; 1:2). Create an approach and wheelchair level area at the bench. The space should be 36" wide x 60" deep per wheelchair. If a front/rear approach, the depth can be reduced to 48" as opposed to 60" for a side approach. Construction options include compacted stone dust, asphalt or similar surfaces that meet the requirement of stable, firm, and slip resistant. Costs will vary depending on material used.</p> <p>Play area ground surfaces immediately around play components and in the fall zone must comply with ASTM F 1951 and ASTM F 1292. Depending on the type, age, and quality of woodchips, they may be considered acceptable as a fall zone ground surface.</p> <p>Accessible compliant playground equipment and swings should be incorporated into the playground area.</p>	2	3	N	Up to \$50,000+
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**Estimated Total Cost:** Up to \$50,100+

### **Cross Street Tot Lot Accessibility Assessment Photos**



Photo Cross Street 1



Photo Cross Street 2



Photo Cross Street 3



Photo Cross Street 4



## PLUMMER PARK

**Function and Description of Facility and Programs:** Plummer Park consists of an abandoned baseball field and a skate park. There is no on-site parking and limited informal street parking.



**Responsible Party:** Northbridge Park and Recreation Commission, Department of Public Works

**General Description or Obstacle Which Limits Mobility or Access:** The chain link gate to enter the abandoned ballfield is not smooth at the base. There is no improved accessible route of travel to the skate park, memorial bench and portable toilet. The portable toilet is not accessible.

### Abandoned Ballfield

The ballfield is no longer in service and serves as an open field. If the area is brought back into use as an active ballfield, then an accessible route of travel to and around the field and to player's seating and bleachers (if provided) will be required. In addition, the chain link gate will need smooth plating on the push side of the gate. If this area remains in its current state as unimproved, no further action is required.

## Plummer 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>
<b><u>Accessible Route of Travel</u></b> There is no accessible route of travel to the skate park and to the memorial bench with the latter being a woodchip surface.  See Photos Plummer 1, 2, and 3.	403	22	An accessible route of travel needs to be provided to all areas available to the public. Construct an accessible route of travel to the skate park and memorial bench. The accessible route of travel must be compliant with width (48" per 521 CMR) and slope (2% max. cross, 5% max. running) requirements as well as changes in level	2	2	N	Up to \$2,000

			surface (no > than ¼" unbeveled or between ¼" and ½" beveled w/a slope of no > 1:2). Construction options can include compacted stone dust as long it is compacted to meet the requirement of stable, firm, and slip resistant.				
<b>Portable Toilet</b> The portable toilet near the entrance to the park is not an accessible portable toilet and is not on an accessible route of travel.  See Photo Plummer 4.	308.2 308.3 604.7 309.4 604.4 604.	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. 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

**Estimated Total Cost:** Up to \$2,000

### **Plummer Park Accessibility Assessment Photos**



Photo Plummer 1



Photo Plummer 2



Photo Plummer 3



Photo Plummer 4

## **ROCKDALE MEMORIAL PARK**

**Function and Description of Facility and Programs:** This facility consists of 4 baseball fields, a concession stand, 6 swings, 2 batting cages, and portable toilets (one of which is “accessible”).



**Responsible Party:** Northbridge Park and Recreation Commission, Department of Public Works

**General Description or Obstacle Which Limits Mobility or Access:** There lacks an accessible route of travel to the swings, concession stand, ballfields, bleachers, batting cages, and portable accessible toilet. There is reduced clear width at the entrance (s) into the facility. The dugouts next to the concession stand have 4” abrupt changes in level surface to access, reduced clear width to one dugout and chain link gates which are not smooth at the base. The concession stand has a 3” abrupt change in level surface to enter and 4” to 8” abrupt changes in level surface to access the outside service counters. The 2 counters are also 7” to 9” too high. The “accessible” portable toilet is not ADA compliant. There is no designated accessible parking in the adjacent paved parking.

### **Rockdale Memorial Park Accessibility Assessment**

<b>General Description of Obstacle</b>	<b><u>2010 ADAAG</u></b>	<b><u>MAAB 521 CMR</u></b>	<b><u>Type of Action to be Taken</u></b>	<b><u>P</u></b>	<b><u>F</u></b>	<b><u>TF</u></b>	<b><u>Cost Estimate</u></b>
<b><u>Parking</u></b> There are no designated accessible parking spaces inclusive of access aisle and signage.	502 703.7.2	23	Stripe and designate at least one van accessible parking space and one passenger vehicle accessible parking space. The van accessible space s/b at a width of either 11’ with a 5’ access aisle or 8’ wide parking space with an 8’ access aisle (2010 ADA Standards). The passenger vehicle accessible space s/b 8’ wide with a 5’ access aisle.	1	2	I	Up to \$450

			Signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located no more than 10' in front of the space. Van accessible signage s/b provided at the van accessible space. Slopes for the parking and access aisles should not exceed 2.0% in any direction.				
<p><b><u>Accessible Route of Travel</u></b></p> <p>There is no accessible route of travel to the ball field, dugouts, bleachers, batting cages, swings, accessible portable toilet, or concession stand.</p> <p>Clear width at entrances and to one of the dugouts near the concession stand have clear widths of less than 32".</p> <p>There are abrupt changes in level surface of 4" to 8" to access the concession stand service counter, up to 3" to access the inside of the concession stand, and up to 4" to access the 2 baseball dugouts next to the concession stand.</p> <p>See Photos Rockdale 1, 2, 3, 4, and 5.</p>	403	22	<p>An accessible route of travel needs to be provided to all areas available to the public. Construct an accessible route of travel fully to and around the swings, ball fields dugouts, bleachers, batting cages, concession stand, and portable accessible toilet. Entry clear widths must be modified so they are at least 32" wide.</p> <p>The accessible route of travel must be compliant with width (48" per 521 CMR) and slope (2% max. cross, 5% max. running) requirements as well as changes in level surface (no &gt; than ¼" unbeveled or between ¼" and ½" beveled w/a slope of no &gt; 1:2). Create an approach and wheelchair level area at the bleachers. The space should be 36" wide x 60" deep per wheelchair. If a front/rear approach, the depth can be reduced to 48" as opposed to 60" for a side approach. Construction options include compacted stone dust, asphalt or similar surfaces that meet the requirement of stable, firm, and slip resistant. Costs will vary depending on material used.</p>	2	3	N	Up to \$75,000+
<p><b><u>Portable Accessible Toilet</u></b></p> <p>The portable "accessible" toilet is not ADA compliant as the soap dispenser is 10" too high and located over the grab bars; the toilet paper dispenser is too close to the front of the toilet and is located over the grab bars; the toilet is 2" too high, 2" too close to the near wall, and 10" too close to the door in front of the toilet; and the door closing speed is too fast.</p>	308.2 308.3 604.7 309.4 604.4 604 404.2.8	30.12 30.7.6 30.8.5 30.7.2 26.9	Replace the existing portable "accessible" 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. The accessible portable toilet must be placed on a level surface (less than 2.0% slope in any direction) and on an accessible route of travel.	3	2	I	TBD
<p><b><u>Concession Stand Counters</u></b></p> <p>The counters (2) are 7" to 9" too high.</p> <p>See Photo Rockdale 6.</p>	904.5	17.6.2	Create a 36" wide counter no higher than 34" a.f.f. below one of the existing counters.	2	2	N	Up to \$350
<p><b><u>Gates</u></b></p> <p>The existing gates (2) to the dugouts near the concession stand do not comply with the 2010 ADA Standards for a smooth surface within 10 inches of the ground on the push side for the full width of the gate.</p>	404.2.10	NA	Remove the gates or install smooth plating at the base of the gates.	2	2	N	\$200

Total up to \$76,000+



## **Rockdale Memorial Park Accessibility Assessment Photos**



Photo Rockdale 1



Photo Rockdale 2



Photo Rockdale 3



Photo Rockdale 4



Photo Rockdale 5



Photo Rockdale 6

## LINWOOD FIELD

**Function and Description of Facility and Programs:** Linwood Field contains 2 basketball courts, 3 baseball fields, bleacher seating, a concession stand, 6 swings, 1 bench, and a portable toilet.



**Responsible Party:** Northbridge Park and Recreation Commission, Department of Public Works

**General Description or Obstacle Which Limits Mobility or Access:** There is no accessible route of travel to the recreational facility or to the swings, concession stand, ballfields, basketball courts, bleachers, bench, and accessible toilet. There is no designated accessible parking. The interior of the concession stand is only accessible by a set of stairs, which lack railings. The concession stand counter is 19½" too high. The portable toilet is not accessible.

## Linwood Field Accessibility Assessment

General Description of Obstacle	<u>2010</u> <u>ADAAG</u>	<u>MAAB</u> <u>521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost</u> <u>Estimate</u>
<b><u>Parking</u></b> There are no designated accessible parking spaces inclusive of access aisle and signage.	502 703.7.2	23	Stripe and designate at least one van accessible parking space and one passenger vehicle accessible parking space. The van accessible space s/b at a width of either 11' with a 5' access aisle or 8' wide parking space with an 8' access aisle (2010 ADA Standards). The passenger vehicle accessible space s/b 8' wide with a 5' access aisle. Signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG	1	2	N	Up to \$3,500+

			Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located no more than 10' in front of the space. Van accessible signage s/b provided at the van accessible space. Slopes for the parking and access aisles should not exceed 2.0% in any direction.				
<p><b><u>Accessible Route of Travel</u></b></p> <p>There is no accessible route of travel to the basketball courts, ball fields, bench, bleachers, swings, portable toilet, or concession stand.</p> <p>The interior of the concession stand can only be accessed by a set of 3 stairs. The stairs lack railings.</p> <p>See Photos Linwood 1, 2, 3, and 4.</p>	403	22	<p>An accessible route of travel needs to be provided to all areas available to the public. Construct an accessible route of travel fully to and around the swings, ball fields, basketball courts, bleachers, bench, concession stand, and portable toilet.</p> <p>The accessible route of travel must be compliant with width (48" per 521 CMR) and slope (2% max. cross, 5% max. running) requirements as well as changes in level surface (no &gt; than ¼" unbeveled or between ¼" and ½" beveled w/a slope of no &gt; 1:2). Create an approach and wheelchair level area at the bleachers. The space should be 36" wide x 60" deep per wheelchair. If a front/rear approach, the depth can be reduced to 48" as opposed to 60" for a side approach. Construction options include compacted stone dust, asphalt or similar surfaces that meet the requirement of stable, firm, and slip resistant. Costs will vary depending on material used.</p> <p>If public access is allowed within the concession stand, including volunteers, a ramped approach would be required fully compliant with S. 405 and S. 505 of the 2010 ADA Standards and S. 24 of 521 CMR.</p> <p>Due to the terrain from the parking to the recreational facility, a switchback ramp with compliant paired railings would be required.</p>	2	3	N	Up to \$100 K+
<p><b><u>Portable Toilet</u></b></p> <p>The portable toilet near the entrance to the park is not an accessible portable toilet and 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 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. 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	N	TBD
<p><b><u>Concession Stand Counter</u></b></p> <p>The counter is 19½" too high.</p> <p>See Photo Linwood 4.</p>	904.5	17.6.2	Create a 36" wide counter no higher than 34" a.f.f. below the existing counter.	2	2	N	Up to \$175

Total up to \$103,675+



## **Linwood Field Accessibility Assessment Photos**



Photo Linwood 1



Photo Linwood 2



Photo Linwood 3



Photo Linwood 4

## **NORTHBRIDGE ELEMENTARY SCHOOL PLAYGROUNDS AND FIELDS**

**Function and Description of Facility and Programs:** Playground areas adjacent to the school are fully compliant. The front playing fields were still under construction at the time of assessment.



**Responsible Party:** Parks and Recreation Department, School Department

### **General Description or Obstacle Which Limits Mobility or Access:**

#### **Designated Accessible Parking**

The two parking spaces at the front ball field and the two parking spaces near the rear field have signage that is 7" to 15½" too high. One of the front ball field spaces has a running slope of 2.4% to 2.8%.

#### **Accessible Routes of Travel**

The asphalt walkway behind the front baseball field (home plate area) has a segment of roughly 3 to 5 feet with a running slope of up to 5.7%. The walkway at the side playground and basketball court has 2 locations where the walkway crosses a travel lane resulting in abrupt changes in level surface (granite curbing) of ½" to 2". Some of the practice fields at the side and rear of the school do not have an accessible route from the adjacent walkway to the field. Access gates into playing fields and the playgrounds are not smooth on the push side of the gates.

The detailed accessibility assessments are included in the transition plan for the Northbridge Elementary School. Representative photos are provided below.



## **LASELL FIELD AND BASEBALL FIELDS**

**Function and Description of Facility and Programs:** The Lasell Field complex consists of a multi-purpose field and track with bleachers and a broadcast booth, 2 baseball fields, a concession stand, and 2 portable toilets.



**Responsible Party:** Parks and Recreation Department, School Department.

**General Description or Obstacle Which Limits Mobility or Access:** There is no accessible route of travel to the 2 baseball fields, baseball bleachers and dugouts. The baseball bleachers lack a level area for a wheelchair. There is a 3" abrupt change in level surface to access the interior of the concession stand. The concession stand sinks lack knee clearance and a towel dispenser is 13" too high. The concession stand service counters (2) are 14" to 14½" too high. The portable toilets (2) are not accessible and only one is on an accessible route of travel. The chain link gate to the track and multi-purpose field is not smooth at the base. The last 4 feet at the bottom of the ramp to the bleachers has a running slope of 8.5%, which exceeds the maximum allowed of 8.3%. The door into the broadcast booth has a glass pane that exceeds the maximum allowed height by 14".

## Lasell Field and Baseball 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>
<p><b><u>Accessible Route of Travel</u></b> There is no accessible route of travel to the baseball fields, dugouts, and bleachers. In addition, there are no level areas for a wheelchair next to the bleachers. There is up to a 2" abrupt change in level surface to access the dugouts.</p> <p>There is a 3" abrupt change in level surface to access the interior of the concession stand.</p> <p>See Photos Lasell 1, 2, 3, and 4.</p>	403	22	<p>An accessible route of travel needs to be provided to all areas available to the public. Construct an accessible route of travel fully to and around the ball fields, baseball bleachers, and dugouts.</p> <p>The accessible route of travel must be compliant with width (48" per 521 CMR) and slope (2% max. cross, 5% max. running) requirements as well as changes in level surface (no &gt; than ¼" unbeveled or between ¼" and ½" beveled w/a slope of no &gt; 1:2). Create an approach and wheelchair level area at the bleachers. The space should be 36" wide x 60" deep per wheelchair. If a front/rear approach, the depth can be reduced to 48" as opposed to 60" for a side approach. Construction options include compacted stone dust, asphalt or similar surfaces that meet the requirement of stable, firm, and slip resistant. Costs will vary depending on material used.</p> <p>If public access is allowed within the concession stand, including volunteers, a ramped approach would be required fully compliant with S. 405 and S. 505 of the 2010 ADA Standards and S. 24 of 521 CMR.</p>	2	3	N	Up to \$15,000+
<p><b><u>Portable Toilet</u></b> Neither of the 2 portable toilets are accessible.</p>	308.2 308.3 604.7 309.4 604.4 604.	30.12 30.7.6 30.8.5 30.7.2 26.9	Replace one of the existing portable toilets 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. 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	N	TBD
<p><b><u>Concession Stand Counters</u></b> The counters are 14" to 14½" too high.</p> <p>See Photo Lasell 5.</p>	904.5	17.6.2	Create a 36" wide counter no higher than 34" a.f.f. below one of the existing counters.	2	2	N	Up to \$175
<p><b><u>Concession Stand Interior</u></b> The sinks lack knee clearance and the towel dispenser is 13" too high.</p>	306.3 308	32.7 6.5 6.6	As may be required due to a reasonable accommodation request, modify the sink to provide at least 27" of knee clearance and lower the towel dispenser to a height of no more than 48" a.f.f.	2	2,3	L	TBD
<p><b><u>Ramp</u></b> The last 4 feet at the bottom of the ramp to the bleachers has a running slope of 8.5%, which exceeds the maximum allowed of 8.3%.</p>	405.2	24.2	Seek a variance to retain the existing 8.5% running slope.	2	1	I	\$0
<p><b><u>Glass pane</u></b> A glass pane to the broadcast booth from</p>	404.2.11	NA	Doors, gates, and side lights adjacent to doors or gates,	4	2	I	\$0



the lift side (accessible route of travel) is 57" a.f.f., which is 14" too high.  See Photo Lasell 6.			containing panels on accessible routes of travel that permit viewing through the panels shall have the bottom of at least one panel located 43 inches maximum a.f.f.  Frost or block the glass panes.				
<b>Gates</b> The gate to the track and multi-purpose field 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.	404.2.10	NA	Remove the gate or install smooth plating at the base of the gate.	2	2	N	\$100

Estimated Total Cost: Up to \$15,275+

### **Lasell Field and Baseball Fields Accessibility Assessment Photos**



Photo Lasell 1



Photo Lasell 2



Photo Lasell 3



Photo Lasell 4



Photo Lasell 5



Photo Lasell 6

## HIGH SCHOOL ATHLETIC FIELDS

**Function and Description of Facility and Programs:** The athletic fields behind the high school consist of a baseball field, multiple soccer fields, player benches, bleachers, portable toilets, and designated accessible parking.



**Responsible Party:** School Department

**General Description or Obstacle Which Limits Mobility or Access:** There is no accessible route of travel fully around the soccer fields and baseball field and to player benches and bleacher seating. The designated accessible parking lacks signage and lacks van designated spaces. The portable “accessible” toilet is not on an accessible route of travel and is not ADA compliant. The stairs to the facility are not uniform and lack railings. Although the chain link gate at the entrance lacks a smooth surface at the base, it is not on an accessible route of travel so no further action is required.

### High School Athletic Fields Accessibility Assessment

General Description of Obstacle	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
<b>Parking</b> The 17 designated accessible parking spaces lack signage and none of the spaces are designated as van accessible. The farthest 2 spaces at the soccer field have running slopes that vary up to 3.4%, which exceeds the maximum allowed by 1.4%.  See HS Fields 1 and 2.	502 703.7.2	23	Stripe and designate at least one van accessible parking space at both the baseball field and soccer field(s) parking areas. The van accessible space s/b at a width of either 11' with a 5' access aisle or 8' wide parking space with an 8' access aisle (2010 ADA Standards). The accessible passenger vehicle spaces must be 8 feet wide with a 5 foot access aisle. Signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located no more than 10' in front of the space. Van accessible signage s/b	1	2	I	Up to \$1,750+

			<p>provided at the van accessible space. Slopes for the parking and access aisles should not exceed 2.0% in any direction.</p> <p>As the number of accessible spaces provided far exceeds that required, it is recommended that the 2 non-compliant spaces (excessive running slopes) at the soccer fields be taken out of service as formally designated accessible spaces but be reserved for elderly or persons with other mobility issues.</p>				
<p><b>Stairs</b></p> <p>The stairs to the athletic fields are not uniform and lack railings.</p> <p>See HS Fields 3 and 4.</p>	504 505	27	<p>As feasible, modify the stairs so that they are uniform in width and height (at least 11" wide and 4" to 7" high) and provide compliant railings (34" – 38" a.f.f. on both sides with top and bottom extensions).</p>	1	3	L	TBD
<p><b>Accessible Route of Travel</b></p> <p>There is no accessible route of travel fully around the soccer fields and baseball field and to player benches and bleacher seating. There is no level wheelchair area at the bleachers.</p> <p>See HS Fields 5 and 6.</p>	403	22	<p>An accessible route of travel needs to be provided to all areas available to the public. Construct an accessible route of travel fully to and around the playing fields, bleachers, and player benches.</p> <p>The accessible route of travel must be compliant with width (48" per 521 CMR) and slope (2% max. cross, 5% max. running) requirements as well as changes in level surface (no &gt; than ¼" unbeveled or between ¼" and ½" beveled w/a slope of no &gt; 1:2). Create an approach and wheelchair level area at the bleachers. The space should be 36" wide x 60" deep per wheelchair. If a front/rear approach, the depth can be reduced to 48" as opposed to 60" for a side approach. Construction options include compacted stone dust, asphalt or similar surfaces that meet the requirement of stable, firm, and slip resistant. Costs will vary depending on material used.</p> <p><u>Main Soccer Field Accessible Route of Travel</u></p> <p>Option #1: Due to the terrain from the parking to the first soccer field with bleacher seating, a switchback ramp with compliant paired railings would be required.</p> <p>Option #2: Create additional designated accessible parking spaces and turn-around at the end of the soccer field.</p>	2	3	N	\$60,000 to \$160K+
<p><b>Portable Accessible Toilet</b></p> <p>The portable "accessible" toilet is not ADA compliant as both the soap dispenser and toilet paper dispenser are too high and located over the grab bars; the toilet is ¾" too high, 2" too far from the near wall and 9" too close to the door in front of the toilet; and the door closing speed is too fast. In addition, the portable toilet is not on an accessible route of travel.</p>	308.2 308.3 604.7 309.4 604.4 604 404.2.8	30.12 30.7.6 30.8.5 30.7.2 26.9	<p>Replace the existing portable "accessible" 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. The accessible portable toilet must be placed on a level surface (less than 2.0% slope in any direction) and on an accessible route of travel.</p>	3	2	I	TBD

Total up to \$161,750+



## **High School Athletic Fields Accessibility Assessment Photos**



Photo HS Fields 1



Photo HS Fields 2



Photo HS Fields 3



Photo HS Fields 4



Photo HS Fields 5



Photo HS Fields 6

## XV. NORTHBRIDGE SIDEWALKS AND CURB RAMPS

### NORTHBRIDGE SIDEWALKS AND CURB RAMPS

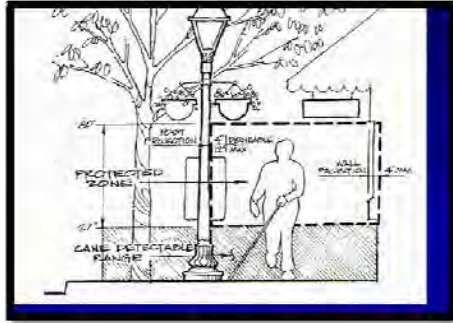
**Description of Assessment Area:** The assessment of public sidewalks, curb ramps, and crosswalks within the Town focused on North Main Street, Main Street, segments of Church Street, and segments of Linwood Street. .

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

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

#### Sidewalks

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



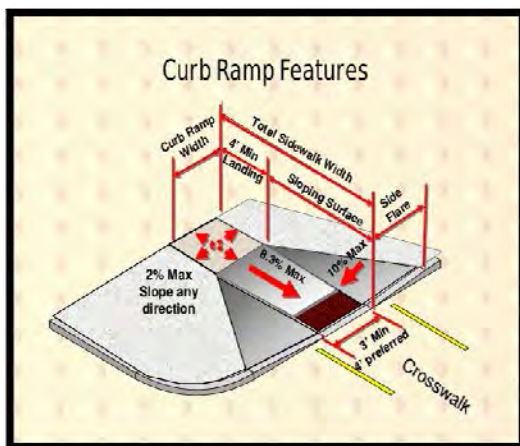
### Curb Ramps

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



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

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



**Responsible Party:** Highway Department and 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.



### **North Main Street (Purgatory Road to Overlook) Sidewalks and Curb Ramps**

Overall, the existing mostly asphalt sidewalks are in poor condition. There is severe deterioration throughout the segment. A number of driveway crossings have excessive cross slopes. Sidewalk clear widths are reduced to less than the minimum required 36" due to deterioration and fixed objects.

#### **Sidewalk Condition and Obstructions**

- Sidewalk clear width reduced to 18" to 28" due to debris and deterioration
- Severe deterioration at #246/#256 driveway
- #246 portion of driveway up to 6.0% cross slopes
- #256 portion of driveway up to 2" abrupt changes in level surface and up to 4.0% cross slopes
- A telephone pole at Sullivan Drive restricts the sidewalk clear width to only 20"



#### **Lack of Detectable Warning Strips**

- Sullivan Drive (both sides)

#### **Crosswalk and Curb Ramp Condition and Obstructions**

- Sullivan Drive (both sides) up to 3" to 4" change in level surface to the sidewalk

### **North Main Street (Overlook to Main Street) Sidewalks and Curb Ramps**

Overall, the existing mostly concrete sidewalks are in good condition. Street crossing signage near Main Street serve as protruding objects. One of the crosswalks has catch basins with 3½" x 4½" openings located within the striped area.

#### **Crosswalk and Curb Ramp Condition and Obstructions**

- The crosswalk at Crescent Street and North Main Street has 2 catch basins within the painted crosswalk area with grate openings of 3½" x 4½", which exceeds that allowed within an accessible route of travel



#### **Protruding Objects**

- Crossing signage at B Street is a protruding object at 74" a.f.f. with an 11" protrusion into the accessible route of travel
- Crossing signage at A Street (2 signs) are protruding objects at 70" and 72" a.f.f. with 9" protrusions into the accessible route of travel



### **Main Street Sidewalks and Curb Ramps**

Overall, the sidewalks are in poor condition. There is severe deterioration throughout with heaving, abrupt changes in level surface, excessive cross slopes, and lack of maintenance. Cross walks lack striping. Curb ramps lack detectable warning strips, lack level landings, and have abrupt changes in level surface. A telephone guy wire and a telephone mounted control box near town hall serve as protruding objects. The operating mechanism for pedestrian signalization was not in service at the time of assessment.

### **Sidewalk Condition and Obstructions**

- Severe sidewalk deterioration, heaving, and/or abrupt changes in level surface at the sidewalk across from CoreMark, manhole cover in sidewalk opposite CoreMark (up to 1" change in level surface), sidewalk at #254/#252, sidewalk at #253/#254, sidewalk at the Fire Station (especially in the driveway area), sidewalk at Core Concepts parking, sidewalk at EAW and Access
- Sidewalk clear width at #253/#255 reduced to only 30" due to sidewalk deterioration
- Driveway cross slope at #203 varies from 3.4% to 4.0%
- Severe vegetative over growth at #231/#233 protrudes into the accessible route of travel
- Accumulation of debris on the Oak Street sidewalk eliminates the accessible route of travel in entirety
- Various debris on the sidewalk adjacent to Core Concepts creates an unstable surface







#### Lack of Detectable Warning Strips

- Crosswalk at North Main and Main (4) across Main Street
- Crosswalk across Main at Arcade Street (warning strip partially missing on Arcade side, lacking on Unified2 side, and lacking on the east side)
- Crosswalk across West Street (both sides)
- Crosswalk at Forest Street across Main Street (no warning strip on the Polyfoam side)
- Crosswalk at Omni and the Community Center (none either side)
- Crosswalk at WRT Mgt and the Community Center (none either side)
- Crosswalk at Douglas and Main across Main (both sides)
- Crosswalk at Douglas and Main across Douglas (both sides)
- Crosswalk at Hill and Main across Main (both sides)
- Crosswalk at Hill and Main across Hill (both sides)
- Crosswalk across Church Street to Common (both sides)
- Crosswalk across Linwood Street (both sides)



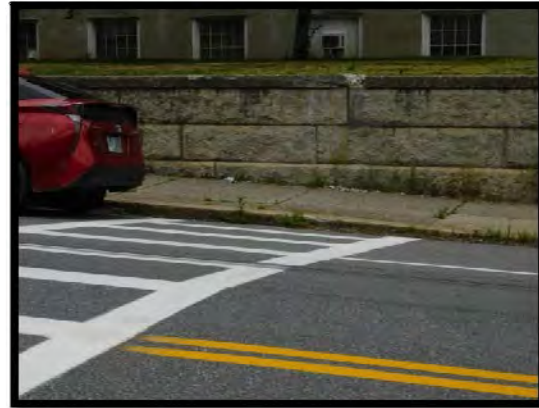
#### Lack of Curb Ramp Level Landing

- Lake and Main (across Main) no level landing either side (7.2% and 4.4% slopes)
- Maple Street (#240/#242 side) up to 2.8% running slope
- CoreConcepts building side and CoreConcepts parking side across Main Street (5.6% running slope on parking side)
- Douglas and Main (library side) up to 3.0% cross slope

- Hill and Main (across Hill) up to 4.0% cross slope on the Hill Street/bank side
- Hill and Main (across Hill) up to 4.5% cross slope on the Hill Street/Community Center side

#### Non-compliant Curb Ramp Transitions to Street

- Maple Street curb ramp (new) up to 1" abrupt change in level surface on #242/#240 side
- Street to Regional Recycling on the Fire Station side up to 3" granite curbing
- Douglas and Main (across Douglas on the library side) up to 1" abrupt change in level surface
- Douglas and Main (across Main on the library side) up to 1" abrupt change in level surface
- Crossing at Omni and the Community Center empties into up to 5" granite curbing on the Community Center side
- Crossing at WRT Mgt and the Community Center empties into up to 1" granite curbing on the Community Center side
- There is no curb ramp on the Fire Station side of the crossing at the Fire Station and Regional Recycling



#### Crosswalk Condition and Obstructions

- The crosswalks across Lake Street, Maple Street, West Street, Linden Street, Fire Station and Regional Recycling, High Street and Grove Street lack striping



#### Protruding Objects

- The telephone guy wire (Pole #3) at EAW and Access is a protruding object



- The control box on Pole #4 at EAW and Access protrudes 8" into the accessible route of travel at a height of 51½" a.f.f.



### **Church Street Sidewalks and Curb Ramps (Church Street at Linwood to Johnston Avenue)**

Overall, the sidewalks are in very good condition with some limited concrete pad heaving. Curb ramps lack detectable warning strips, lack level landings, and have abrupt changes in level surface. Signage and telephone pole guy wires serve as protruding objects.

#### **Sidewalk Condition and Obstructions**

- There are abrupt changes in level surface at the Unibank driveway including up to a 1" pavement drop
- There is a 1½" abrupt change in level surface due to lifting of the concrete pad at #83 Church Street
- Deterioration of the driveway at #95 Church Street creates an up to 1" abrupt change in level surface
- Concrete pad heaving at #214 results in up to a 1" abrupt change in level surface
- Concrete deterioration at the Post Office results in roughly 6" x 20" missing concrete at depth of 1"
- The electric control box on Prospect Street restricts the clear width to only 27" between the box and the Family Dentistry stone wall







#### Lack of Detectable Warning Strips

- Across Church Street at Library/Common (both sides)
- Across Church and Park Street (2 – both sides)
- Across Park Street (both sides)
- Across Church Street #95 to #98A (both sides)
- Across Church Street at Cross Street and Fisher Auto (odd side)
- Across Prospect Street (at #125 side)
- Across Church at Crystal Gas and Valley Gas (both sides)
- Across Church at #229 and Superior Roofing (both sides)
- Across Johnston Avenue on the odd side of the street (both sides)
- Across Church at Johnston Avenue (even side)
- Across Johnston Avenue on the even side of the street (both sides)
- Across Cross Street (Fisher Auto side)





#### Lack of Curb Ramp Level Landing

- Across Prospect Street (#125 side)
- Crystal Gas and Valley Gas (Valley Gas side)
- Across Johnston Avenue (both sides)

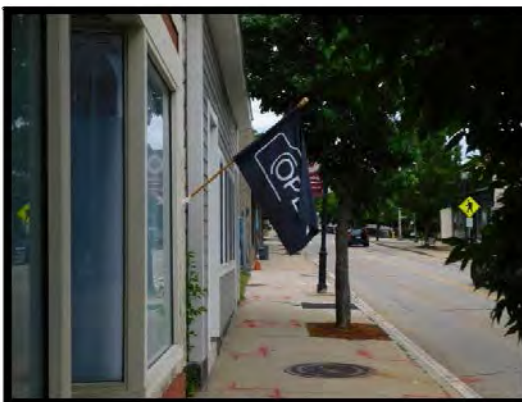
#### Non-compliant Curb Ramp Transitions to Street

- The crossing across Church Street at Cross Street and Fisher Auto terminates in 4" to 5" of granite curbing
- The crossing across Prospect Street on the Family Dentistry side terminates in 3" to 5" of granite curbing
- The crossing across Prospect Street on the Family Dentistry side terminates in 3" to 5" of granite curbing
- The crosswalk at Prospect Street on the Family Dentistry side has a storm drain w/1½" x 6½" grate openings in the crosswalk, which exceeds that allowed within an accessible route of travel
- The crossing across Church Street at Prospect Street side terminates in 2" to 6" of granite curbing on both sides
- The crossing across Church Street on the brick church side has a storm drain w/1½" x 6½" grate openings in the crosswalk, which exceeds that allowed within an accessible route of travel
- The crossing across Johnston Avenue on #230 side terminates in 1" to 4" of granite curbing
- The crossing across Church Street at Johnston Avenue on the #237-#239 side terminates in up to 7" of granite curbing
- The crossing across Cross Street on the brick church side terminates in 1" to 2" of granite curbing



### Protruding Objects

- The #105 “open” sign protrudes into the accessible route of travel with a 4” protrusion at a height of 73” a.f.f. and a 12” protrusion at a height of 80” a.f.f.
- The crossing sign near #117 Church Street has a 4” protrusion at a height of 66” a.f.f. and a 20” protrusion at a height of 80” a.f.f.
- The telephone guy wire (Pole #13) at #117 is a protruding object
- The crossing sign at Park Street has an up to 18” protrusion at a height of up to 80” a.f.f.
- The flag at Valley café and Bakery has a 4” protrusion at a height of 73” a.f.f. and a 14” protrusion at a height of 80” a.f.f. *Note: There were other sign holders on Church Street but flags were not on display to determine level of compliance*



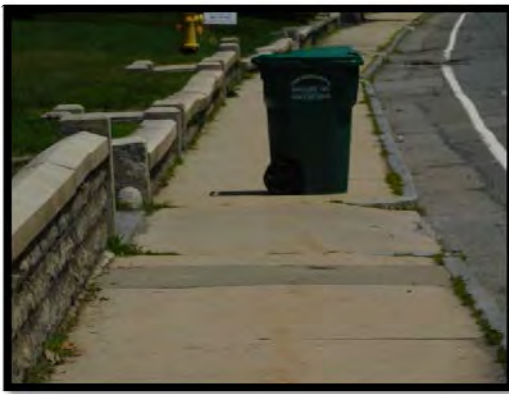


### **Linwood Street Sidewalks and Curb Ramps (Main Street to Northbridge Middle School)**

Overall, the sidewalks are in poor condition with severe deterioration, heaving, abrupt changes in level surface, and excessive cross slopes, especially towards Northbridge Middle School. An apex curb ramp/crossing a Cross and Linwood emptied into the

#### **Sidewalk Condition and Obstructions**

- Severe sidewalk deterioration, cracking, heaving, and/or abrupt changes in level surface occur at #49, near driveway at Methodist Church, near #121, near #135/#137, near #172 especially near the driveway, near # 158, near #144, near #134, near #128, #110, and near Crothers Tire Company
- Excessive driveway cross slopes of 3.0% to 5.0% occur at #121 and #145
- Recycling and Trash Bins placed in the sidewalk reduce the clear width to less than 36"





#### Lack of Detectable Warning Strips

- Curb ramps at #30/#32 and Episcopal Church (both sides)
- Linwood and Cross across Linwood (2 – both sides)
- Linwood and Cross across Cross (2 – both sides)



#### Lack of Curb Ramp Level Landing

- #30/#32 and Episcopal Church both sides up to 3.0% running slope
- Across Cross Street at School Administration Building side (> 2.0%)

#### Non-compliant Curb Ramp Transitions to Street

- Across Cross Street on Northbridge Middle School side (1" to 3" abrupt change)

#### Protruding Objects

- Vegetative overgrowth past #128 to Crothers Tire Company (#110 Linwood Avenue) clear width reduced to less than 36"
- The telephone guy wire near Church and Linwood (even side of street) is a protruding object



#### Crosswalk Condition and Obstructions

- An “apex” crossing at Cross and Linwood empties into the street on the Cross Street side



*Note: Curb ramps, cross walks, and sidewalks at and or near the Northbridge Middle School are addressed in the detailed Northbridge Middle School Accessibility Assessment.*

## **XVI. APPENDICES**

Appendix A: Survey Form

Appendix B: Public Notice

Appendix C: Grievance Procedure

Appendix D: Reasonable Accommodations Policy

Appendix E: Reasonable Accommodations Request Form

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



## Appendix A: Survey Form

## **Northbridge Self-evaluation Survey**

**Department:** \_\_\_\_\_

1. Describe the function of the department and any programs it offers or services that it provides.
  
  
  
  
  
  
  
2. Is staff aware it may be necessary to modify program policies or practices to enable people with disabilities to participate in and benefit from the programs?

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

3. Does the department/program have a formal or informal process for responding to requests for modifications?
  
  
  
  
  
  
  
4. Briefly describe general office/service communications. Specifically, how is information disseminated and communicated? Are there assistive devices or auxiliary aids (i.e. TTY, TDD, sign language interpreter) which are used or available?

5. Are there any circumstances in which a person with a disability would be prohibited from participating in regular activities because of the provision of separate activities?
  
  
  
  
  
  
  
  
  
  
6. Employment Practices.
  - a. Please list the number of full- and part-time employees.
  
  
  
  
  
  - b. Has any of these staff declared a disability? If yes, describe.
  
  
  
  
  
  - c. Have you been asked to provide a reasonable accommodation? If so, please describe the request and what accommodation was provided.
  
  
  
  
  
  - d. Are there any required formal tests as a condition of employment? If yes, describe.
  
  
  
  
  
  - e. Do any of the positions have formal job descriptions? If so, state which position and attach a copy of the job description as well as a sample job ad.

## Appendix B: Public Notice

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

Employment. The Town of Northbridge 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 Northbridge 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 Northbridge 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 Northbridge 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:

Adam Gaudette, ADA Coordinator  
Town Hall – 7 Main Street  
Whitinsville, MA 01588  
Phone: 508.234.2095  
Email: [agaudette@northbridgemass.org](mailto:agaudette@northbridgemass.org)

The Town of Northbridge 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 Northbridge**  
**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 Northbridge.

The Town of Northbridge's Personnel Policy governs employment-related complaints of disability discrimination. 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:

Adam Gaudette, ADA Coordinator  
Town Hall – 7 Main Street  
Whitinsville, MA 01588  
Phone: 508.234.2095  
Email: [agaudette@northbridgemass.org](mailto:agaudette@northbridgemass.org)

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 Northbridge 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/or his/her designee may appeal the decision of the within 15 calendar days after receipt of the response to the Northbridge Board of Selectmen or their designee.

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

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

All written complaints received by the Northbridge ADA Coordinator, appeals to the Northbridge Board of Selectmen and responses from these two offices will be retained by the Northbridge Board of Selectmen for a at least 3 years.

## Appendix D: Reasonable Accommodation Policy

## Town of Northbridge

### Reasonable Accommodation Policy

In accordance with the Americans with Disabilities Act, the Town of Northbridge 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 Northbridge 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**

Adam Gaudette, ADA Coordinator  
Town Hall – 7 Main Street  
Whitinsville, MA 01588  
Phone: 508.234.2095  
Email: [agaudette@northbridgemass.org](mailto:agaudette@northbridgemass.org)

If the Town of Northbridge 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 Northbridge 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 NORTHBRIDGE**  
**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?

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

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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: \_\_\_\_\_

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

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**EMPLOYEE**

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

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

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

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

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

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Requestor's Signature \_\_\_\_\_

Date \_\_\_\_\_

**RETURN THIS FORM TO THE  
NORTHBRIDGE 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 Town. Non-entitlement communities (such as Northbridge) 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.