

V TRANSITION PLAN

A. TITLE I (PERSONNEL)

COMPLIANCE GUIDELINES

The following is an excerpt from the Title I regulations:

"Employers with 15 or more employees may not discriminate against qualified individuals with disabilities. Employers must reasonably accommodate the disabilities of qualified applicants or employees, including modifying work stations and equipment, unless undue hardship would result.

The term "qualified individual with a disability" means an individual with a disability who, with or without reasonable accommodation, can perform the essential functions of the employment position that such individual holds or desires. For the purposes of this title, considerations shall be given to employer's judgment as to what functions of a job are essential, and if an employer has prepared a written description before advertising for the job. This description shall be considered evidence of the essential functions of the job.

The term "reasonable accommodation" may include: (A) making existing facilities used by employees readily accessible to and usable by individuals with disabilities; and (B) job restructuring, part-time or modified work schedules, reassignment to a vacant position, acquisition or modification of equipment or devices, appropriate adjustment or modification of examinations, training materials or policies, the provision of qualified readers or interpreters, and other similar accommodations for individuals with disabilities.

In general, the term "undue hardship" means:

(A) an action requiring significant difficulty or expense, when considered in light of the factors set forth in subparagraph (B).

(B) factors to be considered in determining whether an accommodation would impose an undue hardship on a covered entity include:

(i) the nature and cost of the accommodation needed under this Act; (ii) the overall financial resources of the facility or facilities involved in the provision of the reasonable accommodation; the number of persons employed at such facility; the effect on expenses and resources, or the impact or otherwise of such accommodation upon the operation of the facility;

(iii) the overall financial resources of the covered entity; the overall size of the business of a covered entity with respect to the number of its employees, the number, type, and location of its facilities; and

(iv) the type of operation or operations of the covered entity including the composition, structure, and functions of the work force of such entity; the geographic separateness, administrative, or fiscal relationship of the facility or facilities in question to the covered entity."

RECOMMENDATIONS

1. Despite the absence of any written hiring procedure in the Town which overtly discriminates against individuals with disabilities, the Town and Schools could enhance their position of compliance by adopting a simple statement which declares its non-discrimination. An example of such a statement is as follows:

"The Town of Duxbury, in conformance with Title I of the Americans with Disabilities Act, hereby declares that it will not discriminate against qualified individuals with disabilities in the practice of its employment decisions (i.e. application process, employment, compensation, advancement or discharge, training and other conditions of employment)."

Such a statement should be made by the Board of Selectmen and the School Committee in order to cover all employees who work for the Town. This statement should be made after consultation with union representatives, if applicable. The declaration should then be posted in a conspicuous place in the Town where other such postings are displayed. An alternative to such a statement would be to incorporate similar language into all existing and future job descriptions.

2. With few exceptions job descriptions have been written for all positions for which the Town and School hires staff, both full and part-time. The job descriptions have been written with attention to detail. When the job descriptions are updated they should be written in such a manner that essential versus non-essential job components are clearly delineated. (A public entity is allowed to not hire an individual who cannot perform an essential job component; the public entity is required to consider hiring an otherwise qualified individual with a disability who may not be able to perform duties which are non-essential, if said duties can be otherwise assigned throughout the remainder of the workforce.) In addition, a number of the Town's job descriptions cite as a job requirement "must be in sound physical condition". This requirement should be eliminated. A candidate should be judged solely upon his/her ability to perform a task, not upon his/her physical condition.

3. The Town and Schools, in their hiring practices, should refrain from asking questions in the interview process, their interview questionnaires, or subsequent to an employee's hire, which relate to a candidate's or employee's disability, whether said disability is apparent or not apparent. This practice will mitigate actual or the appearance of discrimination against individuals with disabilities. Questions may be asked regarding a candidate's or an employee's ability to perform an essential job component written in the job description. Candidates may be asked to demonstrate their ability to perform any such essential component. If performance of such a task requires a special device or accommodation in order to be performed properly, a determination must be made by the

employer if the provision of such a device or accommodation provides the employer an undue hardship as defined above.

The Town and Schools should distribute to department heads and all other potential interviewers a guideline for interview questions. Periodically, this guideline should be reviewed with all individuals in Town and Schools who perform interviews to assure compliance. Included in this report as Addendum #4 is a list of questions not to ask in order to maintain a non-discriminatory posture regarding individuals with disabilities. This should be shared and reviewed with interviewing authorities as well.

4. Given the lack of accessible work environments throughout the Town and Schools and the numerous and diverse accommodations to the work environment which may be necessary in employment or hiring issues, the Town and Schools should undertake compliance by testing for "undue hardship" in each hiring or other employment related case as it arises. Modifications can then be made according to actual employment needs.

For example: An individual who uses a wheelchair and has a hearing impairment applies for a position in one of the offices of the Town Offices. He/She is as "otherwise qualified" as the other applicants for the position. The Town would then be obliged to see if the accommodations necessary to allow this individual to function effectively in the work place, would represent an "undue hardship" upon the Town. Would the physical changes to the work place, in order to be accessible for a wheelchair, be expensive? Would the addition of a TDD to allow communication with the employee's children at home be prohibitively expensive? Would hiring an interpreter to assist the employee's minute taking at meetings be too expensive? Could certain of the duties of the position be re-assigned to other individuals in the work force? The Town would, by asking questions such as these, and assessing its fiscal capabilities of meeting the accommodations required, make an informed decision whether or not hiring this particular individual would cause an "undue hardship".

5. The Town and Schools should adopt a grievance procedure, such as that included as Addendum #2 of this report, for individuals who feel that their rights as an individual with disabilities have been discriminated against.

6. The Town and Schools should consider mentioning in each of its advertisements for available positions that accommodations for individuals with disabilities will be made for interview or testing.

7. The Town and Schools have adopted standard application forms which are used for all candidates for employment. The School's application form contains optional questions at the end, some of which inquire about a candidate's medical history. It is strongly suggested that this portion of the application form be deleted.

8. The Town and Schools should continue to provide auxiliary aids such as large print, hearing aids, and the availability of signers upon request.

9. The Town should adopt as policy that " any contract awarded by the Town include an assurance by the contractor that all work be completed in compliance with ADA and other pertinent accessibility codes".

B. TITLE II (BUILDINGS, SERVICES, & PROGRAMS)

COMPLIANCE GUIDELINES

The following is an excerpt from Title II regulations:

"It is not required that a public entity take any action that it can demonstrate would constitute a fundamental alteration in the nature of the service, program or activity, or would cause an undue administrative or financial burden. Regardless of that, a public entity is required to take some action that would not trigger this limitation and ensure program accessibility. A public entity is required to make structural changes to existing facilities only when program accessibility is not feasible any other way (i.e. reassignment of services to an accessible building, or the provision of auxiliary aids). Where "structural changes" to existing facilities are the only way to arrive at program accessibility, a "transition plan" outlining the steps necessary to complete the structural changes is required."

RECOMMENDATIONS:

1. Fire Station Headquarters Tremont Street

General Comments: The Town has taken tremendous steps towards making this building fully accessible for individuals with disabilities. Therefore, the building may be used not only for the provision of fire and EMS services, but also for public meetings. The following minor modifications should be made to assure full ADA accessibility.

- * Inaccessible entrances to the building should be signed directing traffic to accessible entrances.**
- * Doormats should be secured to the floor at all edges.**
- * Alarms should be modified to be both visual as well as audible.**
- * Exit signs inside the front door and inside the conference room at both exit doors and a sign at the dispatcher's counter should be accessibly mounted and either tactile or Braille.**
- * The accessible lavatory should be remounted to allow a minimum of 29" clearance under the rim.**
- * The telephone off the conference room used on occasion by the public should be modified to have volume control. The availability of volume control should be identified with appropriate signage.**
- * The door knob inside the conference room exit should be roughened.**

*** The Town should continue to provide alternative second floor services upon request in the accessible first floor.**

2. Ashdod Fire Station Franklin Street

General Comments: The services rendered from this building by the lessee must be made accessible as if they were being offered by the Town. Therefore, the building must be modified to some degree to be accessible. The bulk of the service rendered from the building are conducted over the telephone. On infrequent occasion members of the general public do enter the office area of the building. The public is not allowed in the other areas of the building. Therefore, only the "public" area of the building must be made accessible. This may be done effectively by implementing the following modifications.

* The small 3" lip leading to the front door threshold must be ramped. The ramp should be kept at a 12:1 slope and should culminate in a five foot square platform level with the threshold. The ramp may be kept at less than six feet in length and therefore does not need to have rails installed.

* The handle on the entrance door should be modified to be operable with a closed fist.

* The front door swing should be modified to allow a minimum of 18" of clearance on the pull side of the door.

* A single accessible parking space should be added to the paved parking area as close as possible to the accessible front door. This space should be marked on the pavement and accessibly signed. If this space is not adjacent to the front door, but in the existing lot, then a path other than the flagstones needs to be cut.

* The basket which contains directions outside the front door should be rehung at an accessible height of no greater than 54".

3. Antique Apparatus Building rear of Fire Station Headquarters

General Comments: This structure is used for storage by the Fire Department. On infrequent occasions the building is used to display to the general public antique fire apparatus. Therefore, the building should be made accessible. Since the overhead doors would be kept open during the times when the antique apparatus was on display, accessibility through these overhead doors would be acceptable. The thresholds of the overhead doors is level with the adjoining driveway pavement. Therefore, the building will be practically accessible during the display hours. The following minor modification should be made to make the building fully accessible.

* A single accessible parking space should be marked and signed as adjacent as possible to the front doors of the building.

4. Town Offices Tremont Street

General Comments: This facility is practically accessible at this time. Several relatively minor modifications will need to be made as detailed below to allow full ADA compliance. It should be noted, however, that this, the seat of the majority of all Town services for the community is, as a practical matter, accessible for individuals with disabilities and has been so for some time.

* Fire alarm pull boxes throughout the building should be lowered to a height no greater than 54".

* Stairways throughout the inside of the building and at the front entrance to the building should have their railings overlap the top and bottom stairs. Internal stairs should have rails which are continuous on both the inside and outside.

* The door knobs on doors leading to the boiler and other mechanical rooms in the basement should be roughened and tactile signs should be accessibly mounted on the door opening side indicating hazardous areas.

* The fountain on the first floor corridor should be modified to have a spout height no greater than 36".

* Signs should be accessibly mounted and both visual and tactile which identify or direct individuals to the following:

- exits
- inaccessible rest rooms, with directions to accessible rest rooms
- accessible rest rooms
- alarms
- fire extinguishers
- room numbers
- room functions (Treasurer, Town manager, etc.)

* Outside the building inaccessible entrances should be so signed, directing traffic to accessible entrances.

* Door mats should be secured to the floor at all four corners.

* Door handles on all doors leading to rooms used independently by the general public in areas of the facilities which are to be accessible should be retrofitted with handles which are operable by a closed fist.

* A portion of all service counters should have a maximum height of 36" for a minimum width of 36" (or should be modified with a fold down counter of similar dimensions as has already been done in the Fire Headquarters).

* The following modifications should be made to the first floor accessible men's rest room:

- the privacy partition adjacent to the urinal should be moved or removed in order to allow a minimum of 36" of clear space approaching the urinal
- the faucet handles on the accessible sink should be modified to be operable with a closed fist
- the mirror above the accessible sink should be lowered to a height no greater than 40'
- the accessible toilet stall should have hardware inside and out which is operable with a closed fist
- grab bars currently exist on both sides of the accessible toilet; bars are required on one side and rear. An accessibly mounted grab bar should be added to the rear of the toilet
- the table inside the accessible stall should be removed
- the hanger inside the stall should be lowered to a height no greater than 54'.

* The following modifications should be made in the first floor accessible ladies' rest room:

- the faucet handles on the accessible sink should be modified to be operable with a closed fist
- the mirror above the accessible sink should be lowered to a height no greater than 40'
- the towel dispenser should be lowered to a height no greater than 43'
- remove free standing grab bar by accessible toilet and add accessibly mounted grab bar to the rear of the toilet.

* Repair macadam where it meets cement and brick by the rear accessible door to eliminate 1/2' lip.

* Repair macadam on rear sidewalk at both curb cut and where slope of sidewalk meets parking area on the Old Town Hall side to eliminate small lips which impede wheelchair traffic.

* Paint yellow outside edge of sidewalk along rear of building.

* Lower call buttons for elevator on each floor to a height no greater than 42".

* Add a floor marking on the jam outside the elevator on the basement level.

* Visible and audible door opening/closing floor indicators should be installed for the elevator.

* The elevator should be re-keyed to allow independent access to the basement level.

* Assisted listening devices should be purchased and made available for meeting use in the building.

5. Old Town Hall Tremont Street

General Comments: This building is currently used by members of the general public. The building is used on occasion for public meetings. Therefore, the building should be modified to be fully accessible, including its rest rooms. The rear entrance to the building is the one which could most practically be made fully accessible. Since this door is commonly used, is most convenient to all parking, and since the cost of making the front door accessible is significantly greater, a rear accessible entrance is recommended. The following modifications will allow full ADA accessibility once implemented.

* A small ramp or bevel should be added to allow accessibility to the rear entrance door. This bevel or ramp should be kept at a maximum slope of 12:1. Since the ramp would be significantly less than 6 feet in length, it would not require rails. There should be a platform at the top of the ramp a minimum of five feet square allowing at least 18" of clearance to the opening side of the door.

* The fire alarm pull boxes in each lobby should be lowered to a maximum height of 54".

* The Town should strongly consider, but is not required to mark and properly sign an additional van accessible parking space to the rear of the building as adjacent as possible to the accessible entrance to the building.

* The inaccessible front entrance to the building should be signed as such directing traffic to the accessible rear entrance.

* Doormats inside both foyers should be secured to the floor at all edges.

* Both exits from the building should be signed using tactile lettering. The signs should be placed at accessible heights no greater than 54" adjacent to each exit.

* With relatively minor modifications both rest rooms could be made full ADA accessible. However, the Town could choose to make only one rest room fully accessible and declaring it uni-sex for use. Given the relatively small cost of making both rest rooms accessible, it is recommended that both be modified for the convenience of all users. The modifications are as follows:

MEN'S

- reverse entrance door swing
- modify entrance doorknob to be operable with a closed fist
- accessibly mount a tactile sign adjacent to the entrance door identifying room as an accessible rest room
- add a grab bar to the rear of the accessible toilet
- lower hanger in accessible stall to a maximum of 54"
- modify faucet handles to be operable with a closed fist
- towel dispenser should be lowered to a maximum height of 43'
- urinal should be lowered to a height of 15' to lip of basin

- privacy petition beside urinal should be removed

WOMEN'S

- reverse entrance door swing
- modify entrance doorknob to be operable with a closed fist
- accessibly mount a tactile sign adjacent to the entrance door identifying room as an accessible rest room
- add a grab bar to the rear of the accessible toilet
- lower hanger in accessible stall to a maximum of 54"
- raise the accessible sink to allow a 29' clearance underneath
- modify faucet handles to be operable with a closed fist
- towel dispenser should be lowered to a maximum height of 43'

6. Police Station West Street

General Comments: The general public normally uses a very small portion of this building. The remainder of the building is generally off-limits to members of the general public for security reasons. The three areas of the building which should be accessible to members of the general public are the entrance foyer or lobby where the bulk of public business is conducted, one private conference room and the lock-ups. The foyer area is currently fully accessible. On infrequent occasion a member of the general public needs to enter the building beyond the foyer area for more private meetings or conferences. The third area of the building which should be accessible are the lockups. The Town may leave the lockups inaccessible and develop an alternative provision of this service in an accessible location off-site. This is currently being done by transfer to Plymouth Court or the Plymouth House of Correction.

- * Properly mark on the pavement and sign an accessible parking space as adjacent as possible to the base of the sidewalk which leads to the ramp in the front of the building.**
- * Inaccessible entrances to the building should be so signed directing traffic to the accessible entrance.**
- * Doormats in the building should be secured to the floor at all edges.**
- * A tactile sign should be accessibly mounted inside the entrance door indicating an accessible exit.**
- * A tactile sign should be accessibly mounted adjacent to the rest room in the foyer indicating that the rest room is accessible.**
- * The pad at the public telephones outside the building should be modified to allow access from the adjoining area. The lip should be beveled or ramped to allow access and should culminate in a platform which is a minimum of 5' square at the base of the phones.**
- * A portion of the counter by the dispatch window should be modified to a height no greater than 36" for a width of a minimum of 36" (this may alternatively be provided by a fold down counter or an accessible writing surface such as a table).**

* One of the two rest rooms should be modified to be fully accessible and designated as a uni-sex rest room. The entry door should be rehung to allow 18" of clearance on its opening side. The privacy petition should be removed, and accessible locking hardware should be added to the entry door on the inside. Grab bars should be accessibly mounted on the side and rear of the accessible toilet. The toilet should be raised to a height of between 17 and 19". The sink should be raised to allow a clearance underneath of 29". The mirror should be lowered to a height of 40; other dispensers should be lowered to an accessible height.

**B. Dingley
West Street**

General Comments: This facility is generally accessible for the service which it renders. Therefore, no recommendations are made for modifications.

**C. Ashdod
Keene Street**

General Comments: This facility is generally accessible for the service which it renders. Therefore, no recommendations are made for modifications.

**D. Myles Standish
Chestnut Street**

General Comments: This facility receives considerable use and is not easily accessible given the nature of the single stone and cobblestone entrance. The recommendations below concentrate only on modifying the entrance to the grounds. Once inside the grounds, the existing terrain accommodates reasonable accessibility.

* Develop an impermeable, accessibly sloped walkway from the pull-off area through the existing gate. (This may be done adjacent to the existing steps by simply widening the gate and constructing the walkway adjacent to it, or the Town may choose to add a separate gate and walkway at a different location to leave intact the existing stone entrance.)

* Post a sign adjacent to the newly accessible walkway to the facility to secure parking for individuals with disabilities. No improvements are required for this parking; the pull-off area may remain unchanged as long as the path from the site where an auto would pull off and park and the base of the walkway is reasonably level and solid.

8. Highway Department Complex Tremont Street

General Comments: The public generally has no access to this complex. It is used primarily by staff. On infrequent occasion there may be a member of the general public who wishes to speak with the Director of Natural Resources or the Highway Superintendent. However, the Town's central administrative offices for the services disseminated from these buildings are located in the fully accessible Town Hall. Therefore, the modifications to this building are minimal with the understanding that most public contact for these departmental services will either be completed over the phone or at the Town Hall. The infrequent services for the public in these buildings may be accommodated in the accessible administrative section of the main structure.

*** Mark and sign an accessible parking space as adjacent as possible to the main entrance to the administrative section of the main structure.**

*** Place a sign adjacent to this parking space and adjacent to the main entrance to the main entrance door which directs public to the accessible Town Hall for departmental inquiries.**

9. Dog Shelter rear of Highway Complex

General Comments: The Dog Shelter is not currently accessible to individuals with disabilities. The access from the parking area to the front gate is over rough gravel. The front door of the shelter building is too narrow to be accessible. Modifying the existing structure to be accessible would be expensive when viewed relative to the original cost of the building. More importantly, the service offered within the building could be conveniently offered alternatively outside of the building. Most of the services offered by the Animal Control Officer whose office is located within the building are offered over the telephone. The only service otherwise offered to the public is for viewing animals being held or for paying fees for services rendered or coordinated by the Animal Control Officer. These services are not frequent and could be done by the Animal Control Officer leaving the building and conducting business at a visitor's vehicle. Therefore, the following alternative provision of service is recommended for this facility. This alternative provision of service would be convenient and not discriminatory to individuals who could not gain access to the inaccessible structure.

*** Place a sign and buzzer outside the gate on the fence which offers service of the Animal Control Officer for those unable to enter the building. This buzzer should be placed in such a manner to be used from an occupant in a vehicle. The buzzer should ring inside the shelter at the desk of the Animal Control Officer. A telephone number should be listed on the sign for one to contact alternatively for service if the Animal Control Officer is unavailable.**

10. Library

St. George Street

General Comments: The Town faces perhaps its most interesting challenge of all of its sites in its planning to make its library services accessible. The design of the existing library building inasmuch as it has multiple levels compounds the task of achieving full physical accessibility. The original library was designed to allow access to its two levels only by stairs. Unfortunately, the rest rooms which serve this original section of the building as well as the main portion of the addition are located in the basement. Additionally, each second level of the two section addition is accessed only by stairs.

It is not uncommon for communities to develop a plan to make its library services accessible by an alternative means other than making its entire physical plant accessible. The ADA regulations allows alternative provision of an accessible service by allowing services to be rendered from an inaccessible floor on an accessible floor upon request, if the cost of the renovations to bring about full physical accessibility are too severe or represent an undue hardship. The Town could and should consider utilizing an alternative provision of service alternative in the provision of its library services. However, even such an alternative for Duxbury would be costly since significant modifications are necessary to make any portion of its existing facility accessible. The reasons for this cost is twofold: first rest rooms are currently located in the basement and second, the existing ramp to the main service level needs significant and costly modifications to meet ADA code.

Therefore, what appears below are two basic alternatives to make the library services in Duxbury available to all individuals in the Town. There are, of course, nearly an infinite number of additional alternatives available to the Town, but most would be minor variations on the two which are detailed below. The review of these two alternatives will allow the Town to understand the financial scope of moving into ADA compliance if it chooses to modify its existing facility. Thereafter, the Town may wish to reconsider a third alternative, which has been presented unsuccessfully to Town Meeting in the past, and that is the construction of a new facility which meets ADA code.

The two options below have certain modifications in common. These common modifications are detailed together and should be considered as necessary to complete ADA compliance in conjunction with those modifications specified for each option.

Option #1 - Full Accessibility

The Town could install an elevator in the entryway between the children's library and the main section of the addition in such a manner that access directly from the parking lot level would be achieved. However, in doing so entrance to the main library level would be far away from the main circulation desk and would also necessitate additional security gates in an unattended area. Therefore, both options assume renovation of the existing ramp to

the first or main level as the main accessible entrance to the building.

* Install a central elevator in the area of the existing service elevator. This elevator should be designed to allow stops on each of the five levels of the structure.

* Renovate the existing rest rooms in the basement to be fully accessible. This renovation should include as a minimum the following:

- an entry door of at least 36" in width with handles operable with a closed fist
- an accessible stall a minimum of 5' square with accessible hardware
- an accessibly mounted toilet with grab bars both to the rear and on one side
- an accessibly mounted sink with faucet handles operable with a closed fist
- accessibly mounted fixtures, including a mirror mounted no higher than 40"
- and an accessibly mounted urinal in the men's room.

Option #2 - Alternative Provision on an Accessible First Floor

* Construct an accessible rest room on the accessible first floor, most likely adjacent to the existing administrative office. This rest room may be designated as a uni-sex, accessible rest room and should, as a minimum, meet the following criteria:

- an entry door of at least 36" in width with handles operable with a closed fist
- an accessible stall a minimum of 5' square with accessible hardware
- an accessibly mounted toilet with grab bars both to the rear and on one side
- an accessibly mounted sink with faucet handles operable with a closed fist
- accessibly mounted fixtures, including a mirror mounted no higher than 40"
- and an accessibly mounted urinal in the men's room.

* Provide services in the inaccessible areas of the library at an accessible locations upon request. Post the availability of this service conspicuously at the main circulation desk.

Common Modifications

* Reconstruct the ramp to the first floor entrance to the main section of the addition according to ADA slope specification of no greater than 12:1 with accessibly mounted railings, including 5' landings per 30' interval, if necessary.

- * Sign inaccessible entrances directing traffic to accessible entrances.
- * Signs should be accessibly mounted and both visual and tactile which identify or direct individuals to the following:
 - exits
 - inaccessible rest rooms, with directions to accessible rest rooms
 - accessible rest rooms
 - alarms
 - fire extinguishers
 - room numbers
 - room functions (librarian, etc.)
- * Secure doormats to the floor at all four edges.
- * Modify alarms to be both visual and audible.
- * Modify all doorways on accessible paths of travel to be at least 36" wide and to have handles operable with a closed fist.
- * Fire alarm pull boxes should be lowered to a height no greater than 54".
- * Book stacks should be reorganized to allow a minimum of 36" passage between and around stacks.
- * Where existing signs identify books, tactile signs accessibly mounted should be added.
- * Stair rails should be modified to have continuous rails on each side and should overlap both the top and bottom steps.
- * An accessibly mounted drinking fountain should be added to replace the existing fountain adjacent to the newly accessible rest rooms.
- * The public telephone should be modified to have its highest operable part no greater than 54" high. The phone should be equipped with volume control. The cement pad at the base of the phone should be a minimum of 5' square and should be accessible from the sidewalk leading to the front entrance to the building. The path leading to the front door of the building from the phone pad should be replaced to have a hardened surface.
- * The two curb cuts to the front sidewalks from the side parking lots should be modified to have slopes no greater than 12:1.
- * The two pairs of doors on both sides of the main entrance foyer should be modified to have at least one of the door pair a minimum of 36" wide.
- * The door pair leading to the children's library should be modified to have at least one of the doors a minimum of 36" wide.

* The book depository should be lowered to a height no greater than 54".

* Access to this depository should be a minimum of 36" wide and should allow a turnaround in front of drop off area of at least 48" square.

* Counters at the main circulation and reference desks should be modified to have a minimum length of 36" a maximum height of 36".

* Mechanical rooms in the basement should be modified to have roughened handles and tactile signs accessibly mounted identifying as hazardous areas.

* At least one work station and reading desk in each area of the building should be modified to allow 29" clearance below and a maximum height of 33".

* The security gate in the children's area should be widened to a minimum of 36" in width.

11. Transfer Station Mayflower Street

General Comments: For the most part this facility is accessible. Bins and drop off areas are constructed to be accessible in height. Most importantly, however, there is always an attendant on duty to provide assistance if required. Therefore, rather than modify all drop off areas to be fully accessible, it is recommended that staff assistance be provided upon request. This would seem to be the prudent course of action in light of liability issues and potentially hazardous conditions for individuals with certain disabilities.

* Post two signs, one by the attendant's shed and one by the transfer building, which indicates staff assistance is available upon request. A buzzer or page should be available to notify staff of a service request.

12. Percy Walker Swimming Pool St. George Street

General Comments: Generally, this facility has been designed and modified to be fully accessible. Perhaps the only major concern in this facility is the lift mechanism used to gain entrance into the pool. It cannot be used independently. The ADA regulations and preamble indicate that its goal is to achieve independent accessibility to all services and facilities. The Town has not received any indications that the denial of independent use of its lift represents a hardship. Modification of the existing lift or installation of a ramp into the water would represent a serious expenditure of funds. Therefore, as long as the Town continues to provide assistance upon request for individual using the lift, no additional modifications for this service are recommended. Certain other relatively minor modifications are recommended below to assure full ADA accessibility of this facility.

- * Mark and sign an additional accessible parking space as adjacent as possible to the curb cut by the front access sidewalk to the front doors.**
- * Modify the handles on one of the sinks to be operable with a closed fist.**
- * Repair the door on the accessible stall in the men's room.**
- * Add a grab bar to the rear of the accessible toilet.**
- * Lower one urinal to an accessible height of no greater than 15".**
- * Add a shower seat and provide a hand held shower extension and control adjacent to the shower seat in the men's shower room.**
- * Lower one mirror in the ladies locker room to a height of 40"**
- * Lower one of the hair dryers in the ladies room to a height of no greater than 43".**
- * Widen one changing stall in the ladies room to a minimum width of 36".**
- * Add a shower seat and hand held shower nozzle with controls to one of the ladies showers.**
- * Add a grab bar to the rear of the accessible toilet in the ladies' room. Add accessible hardware to the accessible stall door both inside and out.**
- * Replace one of the sinks in the ladies' locker area with an accessibly mounted sink with accessible faucet hardware operable with a closed fist.**

- * Lower at least one hooks or hangers in each locker room and in accessible toilet stalls to a maximum of 48" in height.
- * Secure the doormats to the floor at all edges.
- * Repair the bevel both inside and outside the front door to allow ease of wheelchair traffic.
- * Sign inaccessible entrances to the building directing traffic to accessible entrances.
- * Replace the knob on the emergency door in the front lobby to be operable with a closed fist.
- * Accessibly mount tactile signs identifying accessible rest rooms, exits, and fire pull boxes.
- * Add a cup dispenser adjacent to the fountain in the pool area. This dispenser should be mounted at a height no greater than 48".

13. North Hill Golf Course Merry Avenue

General Comments: This facility is nearly totally inaccessible. There would be minimal difficulty making the golfing service accessible; however, making the services currently offered in the clubhouse accessible would be an extremely expensive task. It may well be in the best interests of the community to discontinue the services rendered in the clubhouse rather than making them accessible. An alternative course of action would be to discontinue the service provided in the second floor and make the first floor of the building accessible. Nevertheless, even this would be expensive. It should be emphasized that the Town is not free to claim an undue hardship due to fiscal constraints and continue to allow the use or service of an inaccessible clubhouse. Undue hardship may only be claimed as a reason not to make a facility accessible for individuals with disabilities if concurrently the service is made otherwise accessible at an alternative accessible location. Therefore, the recommendations below are for modifying the building to be fully accessible. The Town should strongly consider only modifying for first floor accessibility and closing the second floor or closing the clubhouse entirely and providing accessibly the necessary services to allow course use.

- * Sign a minimum of four accessible parking spaces as adjacent as possible to the base of the ramp leading to the clubhouse.**
- * Regrade and pave a four foot wide minimum access path leading from the parking area to the clubhouse. This pathway should be sloped no greater than 12:1. If the slope is greater than 20:1 then rails must be accessibly mounted on each side and five foot level rest areas must be provided at 30' intervals.**
- * Rebevel the lip from the pathway to the concrete pad and on the main entrance threshold door to a slope no greater than 12:1 slope.**
- * The main entrance door handle should be modified to be operable with a closed fist.**
- * Inaccessible entrances to the building should be signs as such directing traffic to accessible entrances.**
- * A solid pathway a minimum of four feet in width should be constructed from the cement pad around the clubhouse to the picnic area to the left of the building.**
- * The two rest rooms should be converted to at least one uni-sex or two accessible rest rooms. The accessible rest room facility should be designed with the following minimum specifications:**
 - a minimum 36" wide entrance door with a handle operable with a closed fist.**
 - if the privacy petition is to remain it should allow at least 36" of clearance to the wall of the entrance door**
 - install one accessibly mounted sink with faucet handles operable with a closed fist**

- install one accessible toilet stall with accessible hardware
- install one accessible toilet in the accessible stall with a grab bar on the side and rear
- mount at least one mirror no higher than 40"
- mount all dispensers at a height no greater than 43"
- install one urinal accessibly mounted no higher than 15" in the men's room.

* Lower a portion of the service counter to a height no greater than 36" for a minimum length of 36".

* Remount the public telephone allowing four feet of clearance and at a height no greater than 54". The phone should be equipped with volume control.

* Install an accessible fountain.

* Widen the door between the main room and the pro shop to a minimum of 36".

* Install a ramp with a slope no greater than 12:1 between the main room and the pro shop. Since this ramp will be less than three feet long it will need neither a platform nor railings.

* Install a ramp leading from the pro shop exit to the rear of the building. This ramp should be of a slope no greater than 12:1. There should be a five foot platform outside the door level with the threshold. No railings will be necessary if the ramp is less than six feet in length. A solid pathway from the base of the ramp to the cement pad to the rear of the building should be constructed.

* Install an elevator to the second floor level of the building.

* Secure door mats to the floor at all four edges.

* Install tactile signs identifying accessible rest rooms, exits, and fire extinguishers.

* Stairways should be modified to have continuous railings on both sides which overlap the top and bottom steps.

14. Girl Scout House Washington Street

General Comments: An effort has been made to render this building accessible. The rear of the building is accessible currently if the rear rest room is considered uni-sex. The front of the building is not accessible since the front entrance to the building is not accessible and passage to the front of the building from the accessible rear is too narrow to meet ADA specifications. The following recommendations are made to bring the entire building into ADA compliance.

*** Mark and sign two accessible parking spaces as adjacent as possible to the base of the accessible ramp.**

*** Sign inaccessible entrances as such directing traffic to accessible entrances.**

*** Modify the accessible entrance ramp to have a minimum width of 48" between rails. The rails should be of a material which is easily grasped and which does not deteriorate, preferably metal. A non-skid surface should be added to the sloping portion of the ramp.**

*** The rear office doors should be widened to a minimum of 36" and should be modified to have handles operable with a closed fist.**

*** The two entrance doors to the kitchen area should be widened to a minimum of 36". Both doors should have handles operable with a closed fist. In order to allow a 36" width in the front kitchen door either a counter or appliance may have to be removed.**

*** A switch back ramp should be constructed in the front room to allow access to the stage level. This ramp should be of a slope no greater than 12:1, should be equipped with accessible rails, should be of a minimum of 48" wide, and should have 5' square platforms at both the switch back level and at the level of the stage.**

*** Either one of the rest rooms should be modified to be accessible and declared uni-sex in use or both of the rest rooms should be modified to be fully accessible. The following minimum modifications should be made to rest rooms to be made accessible:**

- widen the entrance doors to a width of 36" and add handles operable with a closed fist**
- accessibly post a tactile sign identifying the accessible rest room as such. If the other rest room is not made accessible it should be so posted, directing traffic to the accessible rest room**
- faucet handles operable with a closed fist should be installed on the sink**
- toilets should be remounted at a height of between 17 and 19"**
- grab bars should be accessibly mounted to one side and the rear of the toilet**
- a lock operable with a closed fist should be added to the inside of the accessible rest room**
- mirrors should be lowered to a height of 40".**

- * Doormats should be secured to the floor at all four corners.
- * The main entry door should have its handles modified to be operable with a closed fist.
- * A tactile sign accessibly mounted should identify exits.

15. Tarkiln Community Center Summer Street

General Comments: There have been several modifications to this older structure to provide accessibility. However, a significant number of additional modifications would need to be made if the building is to be used or allowed to be used in the future by the Town. Those modifications are listed below.

- * Extend the paved driveway to the base of the rear accessible ramp and mark and sign an accessible parking space. In addition, an accessibly marked parking space should be added adjacent both to the tennis courts and the ballfield.

- * Sign inaccessible entrances to the building directing traffic to the accessible entrances.

- * Construct an accessible, hardened pathway from the driveway to the entrance to the tennis courts.

- * Add an inside accessibly mounted metal rail to the entrance ramp.

- * A non-slip surface should be added to the slope of the rear entry ramp.

- * The platform at the top of the entry ramp should be modified to allow at least 18" of clearance on the opening side of the door.

- * Add a door handle operable with a closed fist to the accessible door at the top of the entrance ramp.

- * Modify all door handles on doors inside the building in accessible paths of travel to be operable with a closed fist.

- * Replace the two 18" doors exiting from the main room on the right of the building with a single 36" door with a handle operable with a closed fist.

- * Reconstruct the ramp leading from this main room to an accessible slope no greater than 12:1. The ramp should be a minimum of 48" wide, have accessibly mounted rails on either side, and should culminate in a 5' square platform level with the door threshold, allowing a minimum of 18" clearance on the opening side of the door.

- * Both of the two rest rooms should be modified to be fully accessible by making the following minimum modifications:

- widen the two entry doors on either end of the entry corridor to a minimum of 36" with handles operable with a closed fist

- post a tactile sign adjacent to the entry door identifying the room as an accessible rest room

- widen the entry corridor to a minimum of 48"

- replace one of the sinks with an accessibly mounted sink with faucet handles operable with a closed fist
- expand one of the stalls to an accessible size of 5' square and add accessible hardware both inside and out
- mount an accessible toilet inside the accessible stall with grab bars on one side and the rear of the toilet at an accessible height
- lower one mirror to a height of 40" and all other dispensers to a height no greater than 48"
- in the men's room is modified an accessibly mounted urinal should replace one of the existing urinals
- if only one of the rest rooms is modified, it should be declared a uni-sex rest room.

* Rebevel the threshold leading from the rear corridor to the kitchen area to a slope no greater than 12:1.

* Add an accessible ramp to the stage area. This ramp should not need rails since it may be less than 6' in length. The ramp should culminate in a 5' platform level with the stage area.

* Doormats should be secured to the floor at all edges.

* Alarms should be modified to be audible as well as visual.

* Alarm pull boxes should be lowered to a height no greater than 54".

* Mount accessibly tactile signs which identify exits.

Schools

General Comments: What follows are recommendations for the specific needs of each school in order to come into compliance with ADA regulations. However, there are certain recommendations which are common to all active school facilities. The recommendations immediately listed after this paragraph are applicable to and should be implemented in all school facilities which are actively being used by the public school system and which are to be made fully accessible.

GENERAL RECOMMENDATIONS

* Signs should be accessibly mounted and both visual and tactile which identify or direct individuals to the following:

- exits
- inaccessible rest rooms, with directions to accessible rest rooms
- accessible rest rooms
- alarms
- fire extinguishers
- public telephones, citing accessibility
- room numbers
- room functions (gym, guidance, principal, attendance secretary, etc.)

* Outside the building inaccessible entrances should be so signed, directing traffic to accessible entrances.

* Public telephones should be wall mounted in accessible locations at accessible heights and should be equipped with a minimum of volume control for the hearing impaired.

* Door mats should be secured to the floor at all four corners.

* Corridors which are in the path of travel should be kept clear of storage. (This is particularly true of several schools which use exit pathways behind stage areas for storage)

* Door handles on all doors leading to rooms used independently by the general public in areas of the facilities which are to be accessible should be retrofitted with handles which are operable by a closed fist.

* A portion of all service counters should have a maximum height of 36" for a minimum width of 36".

* Accessible parking spaces should be properly marked on the pavement as well as properly signed.

* Auditoriums which allow seating more than 50' from the speaker should be equipped, or should have available portably, assisted listening devices.

*** TDDs should be added to an office within each building and appropriate staff should be trained regarding its proper use.**

16. Chandler Street School

Chandler Street

General Comments: This facility is for the most part fully accessible. The following modifications, coupled with the general recommendations in the preceding section of this report will bring this facility into full ADA compliance once implemented.

* The accessible parking spaces in the front of the building should be remarked on the pavement to show the universal symbol of accessibility in the two designated spaces and a minimum 5' crosshatch in the space in between the two accessible spaces.

* The curb cut ramp in front of the school which gives access to the sidewalk from the driveway should be reconstructed to a minimum of a 12:1 slope.

* An additional curb cut of accessible slope and dimension should be added at the crosswalk to the left side of the school access driveway.

* Both tire bermed play structures to the rear and left side of the building should have a 36" break in the berm to allow access.

* The access gate to the ballfield behind the school should be regraded to allow a full, level 36" at the base of the gate.

* A sign should be placed on the fence outside the ballfield by the gravel parking area, designating an accessible parking space.

* Add an accessible parking space by the fenced in play area to the rear of the school, on the pavement, properly marked and signed.

* The exits at the end of the South Wing corridor, to the rear of the North Wing, and to the rear of the rear wing should be rebeveled to a slope no greater than 12:1 with no breaks in the macadam.

* Signs on the library book stacks should be tactile and accessibly mounted.

* There are three ramps in the central corridor which lead to the rear wing's exit by the gymnasium. All three ramps have acceptable railings. The first ramp has an acceptable slope. The rear two ramps have a slope which does not meet ADA specifications of 12:1. These two ramps should be reconstructed to meet this ADA minimum specification. Ramps also have brick surfaces. Each surface should be treated with a non-slip surface.

* Fire alarm pull boxes should be lowered to 54".

* Main counter is of an acceptable height, but the library counter should be modified (see general recommendation note).

* The hardware on the accessible stall in the North Wing men's room should be replaced with accessible hardware.

* One urinal in each accessible men's room should be lowered to a height of 15" to the lip.

* In the South Wing girl's accessible rest room two toilets are currently in the accessible stall. One should be removed.

17. Elementary School Cushman Avenue

General Comments: This facility is largely accessible for individuals with disabilities. The recommendations below as well as the recommendations included in the preceding general recommendations section, once implemented will allow full accessibility. It should be noted that several recommendations below are for alternative accessibility, since the option of full accessibility would be expensive and the alternative service provision suggested would not represent a hardship for users. On the other hand a recommendation for an additional accessible rest room has been made below for convenience of users. This recommendation is not required by ADA regulations, which allows technical compliance with one accessible rest room per floor. However, the modification of this additional rest room would allow more convenient use for a student who may need to use a rest room between classes and the inherent time constraint.

* The ramp leading through the Magic Dragon classroom section is not of an accessible slope. However, entrance to this section of the building is accessible from the outside of the building. The closest accessible rest room necessitate use of this inaccessible ramp, but it may be assumed that a child in the Magic Dragon program would be assisted to the rest room whether disabled or not. Therefore, the ramp is not recommended to be modified unless the classroom uses change or the Title 1 need arises.

* Rebevel the accessible entrance to the Magic Dragon to provide a smooth slope of less than a 12:1 ratio.

* Construct an accessible parking space as close as possible to this entrance. The space should not be established in such a manner to encourage traffic in the path of travel to the adjacent maintenance garage doors.

* The ramp to the lower gym is also not of compliant slope. However, the upper gymnasium is accessible. There is accessibility to the lower gymnasium from the outside of the building. Therefore, there is no recommendation to modify this inaccessible ramp; however, this would necessitate scheduling gymnasium use in such a manner that the non-accessible 'service' in the lower gym be available to individuals with disabilities in the upper gym.

* Classrooms in the second floor are designed in such a way as to not provide 18" of clearance on the opening side of their entrance doors. In such cases doors should be modified to swing into classrooms.

* No modifications are recommended in the inaccessible locker rooms since they have been converted to storage use.

* A grab bar should be added to the rear of the accessible toilet in the accessible boy's rest room off the blue corridor in the classroom wing.

* The rest rooms in the front red corridor should be modified to be fully accessible. The following modifications as a minimum would be necessary:

- widen the entry doors to 36"
- modify the privacy partition in the girl's rest room to allow 36" clearance
- modify one stall to be of accessible dimensions with hardware both inside and out operable with a closed fist
- install an accessibly mounted toilet in the accessible stall with grab bars accessibly wall mounted on one side and to the rear
- install one accessible sink with faucet handle operable with a closed fist
- lower the mirror above the accessible sink to 40'
- lower all fixtures to an accessible height.

* Add an accessible fountain in the red corridor to replace the existing fountain.

* Where classroom doors in the yellow wing do not allow 18" of clearance on the opening side, the door swing should be reversed.

* Fire doors at the base of the red corridor and elsewhere throughout the building should be modified to have at least one of the door pair a minimum of 36" wide.

* Doors on classrooms behind the cafeteria which have 30" entrances should be widened to 36".

* The main entrance doors to the cafeteria, auditorium, and upper gym should be modified to have at least one of the pair a minimum of 36" wide.

* Wheelchair seating both in the front and rear of the auditorium should be provided and reserved by sign or floor marking.

* Tactile signs accessibly mounted should be provided in the library where otherwise provided currently.

* Grab bars should be accessibly wall mounted on the side and rear of the accessible rest rooms off the blue corridor by the Magic Dragon.

* Add a rail at an accessible height the length of the slope of the ramp in the blue corridor by the Magic Dragon to allow rails on both sides of the ramp.

* Either construct a barrier under the length of or reconstruct to the floor the trophy case in the lobby of the building to allow detection by a visually impaired individual using a cane.

- * The paved access path to the bermed playground on the right side of the building has too steep a slope. This path should be entirely reconstructed to a slope no greater than 20:1.
- * Extend and connect the ramps leading from the berm to the play structure in the play area to the right of the building.
- * Visual and audible alarms should be added to the auditorium.
- * Add an accessible parking space to the rear of the building as adjacent as possible to the accessible entrance by the lower gymnasium.
- * Relevel the entrance to the basketball courts to a slope no greater than 12:1 and to allow a solid surface from the edge of the macadam used for parking to the entrance opening.
- * Add a curb ramp of accessible dimensions to the base of the marked crosswalk which leads to the fenced play structures on the left side of the building.
- * Add signs to the accessible parking spaces on the left side of the building.
- * Lower the call buttons on the elevator at all levels to no higher than 42".
- * Both visual and audible door opening/closing and floor indicators should be added at each stop of the elevator.
- * Controls outside and inside the elevator should be tactile.
- * Install a permanently attached reach stick in the elevator cab.

18. Eben Howes Ellison High School St. George Street

General Comments: This building is nearly fully accessible as it exists. The following modifications as well as the modifications in the general recommendations section of this report, once implemented will bring this facility into full ADA compliance.

- * There are four crosswalks in the road in front of the school. The two most westerly need curb cuts on both sides of the road. The curb cuts already existing on the library/pool side of the street need to be modified to an accessible slope.
- * The sidewalk adjacent to the road in the front of the building needs to be extended on both sides to accessibly blend into the driveway level.
- * The sidewalk in front of the school which bisects the grassy space needs to be repaired on both sides of the easterly side of the access driveway to allow wheelchair traffic.
- * The access paths leading to the football field need to be repaved. In addition, two additional accessible parking spaces need to be marked and signed adjacent to this access path.
- * An opening a minimum of 36" wide needs to be cut in the wire fence which surrounds the soccer field adjacent to the parking area. An additional accessible parking space properly marked and signed needs to be added as adjacent as possible to this new opening.
- * An additional accessible parking space needs to be properly marked and signed adjacent to the tennis court gates.
- * At least one access gate to the tennis courts needs to be widened to a minimum of 36".
- * Each accessible men's room needs to have one of its urinals lowered to a height of 15".
- * A curb cut needs to be added to the sidewalk to the rear of the building adjacent to the exterior ramp. At least one additional parking space properly marked and signed should be added as adjacent as possible to this curb cut.
- * One accessible shower room in the men's locker room and one accessible shower stall in the women's locker room needs to be constructed with the following minimum specifications:
 - eliminate lip on shower room or stall to a minimum width of 36"
 - widen the entrance to the accessible women's shower stall to at least 36"

- add an accessibly mounted shower seat in the accessible shower area
- add a hand held shower nozzle with control to the accessible shower area.

* The following ramps need to be modified to be of an accessible slope of no greater than 12:1 (in addition, those ramps in excess of 30' in length need to have a five foot wide level surface at 30' intervals):

- the ramp from the main lobby leading to the library
- the ramp from the kitchen area leading behind the auditorium
- the ramp leading from the old gymnasium in front of the art rooms
- the two ramps in the industrial arts section

* Ramps with brick surface should be treated with a non-slip surface on their entire slope.

* Fire doors throughout the building with 32" pairs should be modified to have at least one of its doors a minimum of 36".

* Stairs throughout the building should be modified to have continuous rails on both sides and overlaps on the top and bottom.

* The elevator should have both visual and audible door opening/closing and floor indicators on both floors.

* Elevator call buttons should be lowered to a height of 42".

* Elevator alarm should be tactilely signed.

19. Upper Alden Building Cushman Street

General Comments: The access to the first floor of this building has been made accessible. The access to the second floor of the building has been made accessible. The access to the second floor of the building has not been made accessible. Importantly, the internal access between any of the floors has not been achieved. This is important if the building is to be used for a single purpose. For example, if the rest rooms on the first floor are made accessible, an individual on the second floor could not use them without exiting the building, a violation of accessibility code.

The easiest and most effective way of modifying the building to make it fully accessible would be to add an elevator which gives access to all three levels. If the Town does not choose to make the second floor accessible, and wishes either to not use this second floor or provide its services alternatively on an accessible first floor, the cost of making the first and basement levels of the building would be greatly reduced. What appear below are three options for making this building accessible. The three have varying costs and varying levels of accessibility. All three have certain needs in common. These common needs would need to be addressed in addition to the specific recommendations for all three options below.

Option #1 - Three level elevated accessibility

- * Install a fully accessibly designed elevator internally which grants access to all three levels.

Option #2 - Three level chair lift accessibility

- * Install a chair lift on the stairway in the center of the building which grants access between the first floor and basement.

- * Install a chair lift between the first and second floors on a side stairwell.

Option #3 - Two level accessibility with third floor alternative accessibility

- * Install a chair lift on the stairway in the center of the building which grants access between the first floor and basement.

Common Recommendations

- * Add a single accessible parking space properly marked and signed in the front of the building as adjacent as possible to the base of the accessible ramp to the first floor.

* Add a single accessible parking space properly marked and signed in the rear parking area as adjacent as possible to the base of the ramp to the basement.

* Restrict the use of the two rooms on the second floor of the gymnasium to storage or other non-public use.

* Lower all fire alarm pull boxes to a height no greater than 54".

* Modify rails on all stairwells to be continuous on both sides and to overlap the first and last step.

* Modify the first floor men's and ladies room to the following minimum specifications:

- modify handles on entrance doors to be operable with a closed fist
- add faucet handles to the accessible sink which are operable with a closed fist
- add a stall door to the accessible stall with handles inside and out operable with a closed fist
- Replace existing grab bars on accessible toilet with those accessibly mounted on one wall and to the rear of the accessible toilet

- lower a single urinal in the men's room to an accessible height of 15"

- remove or modify the privacy partition in the women's rest room to allow a minimum of 36" clearance to fixtures.

* Add rails on both sides of the slope to the accessible ramp to the outside entrance to the basement.

* Mark and sign an additional accessible parking space as adjacent as possible to the entrance to the tennis courts.

* Signs should be accessibly mounted and both visual and tactile which identify or direct individuals to the following:

- exits
- inaccessible rest rooms, with directions to accessible rest rooms
- accessible rest rooms
- alarms
- fire extinguishers
- public telephones, citing accessibility
- room numbers and functions

* Outside the building inaccessible entrances should be so signed, directing traffic to accessible entrances.

* Door mats should be secured to the floor at all four corners.

* Door handles on all doors leading to rooms used independently by the general public in areas of the facilities which are to be accessible should be retrofitted with handles which are operable by a closed fist.

20. Lower Alden Building Cushman Street

General Comments: This building is currently set up as four separate units of use. If this is to continue to be the case, it will be more expensive to modify to be accessible. The main front corridor does provide access to the left wing of the building as well as the basement of the right wing. However, free access is blocked during use to allow independence of the "rental units". If this is to continue to be the case, then accessible rest room facilities will need to be established in each of the four sections of the building. The recommendations below assume that the Town wishes to continue to allow these four uses to be totally independent. If the Town wishes to allow passage amongst the three first level uses, then all could share a single accessible rest room and a cost savings would result.

*** Modify the rest rooms in the left wing of the building to include the following:**

- install a single accessible stall with hardware inside and out operable with a closed fist
- install an accessibly mounted toilet with accessibly mounted grab bars on one side and the rear
- install an accessibly mounted sink with faucet handles operable with a closed fist
- lower mirror above the accessible sink to a height of 40"
- lower all fixtures to an accessible height
- in the men's room lower a urinal to a height of 15" to the bowl top

*** Signs should be accessibly mounted and both visual and tactile which identify or direct individuals to the following:**

- exits
- inaccessible rest rooms, with directions to accessible rest rooms
- accessible rest rooms
- alarms
- fire extinguishers
- public telephones, citing accessibility
- room numbers
- room functions

*** Outside the building inaccessible entrances should be so signed, directing traffic to accessible entrances.**

*** Door mats should be secured to the floor at all four corners.**

*** Corridors which are in the path of travel should be kept clear of storage. (This is particularly true in the Senior Center area which uses the exit pathway for storage)**

*** Door handles on all doors leading to rooms used independently by the general public in areas of the facilities which are to be**

accessible should be retrofitted with handles which are operable by a closed fist.

* Install a lift to the stage from the gymnasium floor level.

* Alarms throughout the building should be modified to be visual as well as audible.

* One of the two toilet rooms in the main corridor of the middle section of the building should be modified to be fully accessible and designated as a uni-sex rest room by completing the following:

- raising the sink to allow 29" of clearance underneath
- adding grab bars on one side and to the rear of the toilet

* Fire doors throughout the building with 30" door pairs should be modified to have at least one of the two doors a minimum of 36" wide.

* Add a roughened knob to the two boiler rooms in the main corridor and add a tactile sign accessibly mounted indicating a hazardous area.

* Add accessibly mounted rails on both sides of ramps in the main corridor. These rails should run the length of the ramp's slope.

* Fountains throughout the building which are in use and which are more than 36" in height should have cup dispensers added accessibly mounted adjacent to the fountain.

* Repair the area around the threshold to the main entryway to the center section of the building to allow properly beveled wheelchair access.

* Modify the rest rooms in the Senior Center to the following minimum specifications:

- install a single accessible stall with hardware inside and out operable with a closed fist
- install an accessibly mounted toilet with accessibly mounted grab bars on one side and the rear
- install an accessibly mounted sink with faucet handles operable with a closed fist
- lower mirror above the accessible sink to a height of 40"
- lower all fixtures to an accessible height
- in the men's room lower a urinal to a height of 15" to the bowl top

* The 30" pair of fire doors which currently allow entrance into the Senior Center should be replaced with a single door with a minimum width of 36".

* The entry doors into the Recreation Department Office should be modified so that at least one door has a minimum width of 36".

* Construct an accessibly designed ramp to one of the two entrances to the second floor entrance to the right wing of the building. Said ramp should be of a slope no greater than 12:1, should have rails, and should culminate in a platform of 5' square at the threshold level, allowing a minimum of 18" of clearance to the opening side of the entrance door.

* The rest rooms on the second floor of the right wing should be modified to the following specifications:

- install a single accessible stall with hardware inside and out operable with a closed fist

- install an accessibly mounted toilet with accessibly mounted grab bars on one side and the rear

- install an accessibly mounted sink with faucet handles operable with a closed fist

- lower mirror above the accessible sink to a height of 40"

- lower all fixtures to an accessible height

- in the men's room lower a urinal to a height of 15" to the bowl top

- the entrance privacy wall inside the women's room should be modified to allow a minimum clearance of 36".

* Fire alarm pull boxes throughout the building should be lowered to a height no greater than 54".

* Add three accessible parking spaces properly marked and signed as adjacent as possible to the side accessible entrance to the Senior Center.

* Add an accessible parking space as adjacent as possible to the new accessible entrance to the second floor right wing. This space should be properly marked and signed.

* A 36" wide cut should be made in the berm which surrounds the play structure to the right of the building.

21. Playgrounds

A. Wadsworth

Wadsworth Road

General Comments: This playground is generally accessible as it exists. The field is level and grassy and is negotiable by wheelchair traffic. The ball field, swings, and tennis courts are open and accessible. The sole problem is gaining access to the field level from the parking level. Currently, the access drive is unimproved and relatively steep. The front of the facility facing the main street is not an alternative accessibility option due to the existing fence and the lack of sufficient space to safely pull off the road to park. Therefore, the following should be done to achieve reasonable accessibility for this facility.

(See general note applicable to all playgrounds at end of this section.)

*** Sign an accessible parking space as adjacent as possible to the base of the access drive.**

*** Improve a 48" wide path either adjacent to or on the existing driveway. This path should be of a hardened surface graded as gradually as possible and should reach as a minimum the level, grassy portion of the main field.**

B. Island Creek Pond

Tobey Garden Street

This playground area is generally accessible as it exists. The access road and parking area is gravel, but level. There are no curbs or other obstacles between the parking area and the sandy beach or the picnic area. Therefore, only one minor recommendation is made for this facility below.

*** Sign an accessible parking space as adjacent as possible to the beach in the parking area to the left of the access driveway.**

C. Linclon

Lincoln Street

General Comments: This facility is relatively accessible. The field is flat and grassy and presents no significant obstacles to traverse. There is no break in the fence, however, to allow access onto the field from the parking area. Therefore, the recommendations below are those necessary to allow full accessibility for this facility.

*** Sign three accessible parking spaces adjacent to the center of the parking area by the soccer fields.**

*** Cut an opening in the wire fence to allow access. This opening should be a minimum of 36" wide and should be adjacent to the new accessible parking spaces.**

D. Keene
Keene Street

General Comments: This facility is fairly accessible as it exists. The tennis courts are open on the side and there exists a path from the parking area to the opening onto the courts. The path could use some improvement. The ballfield is open on the side for access and parking is available for spectators. The following recommendations would enhance the accessibility of this facility.

- * Sign an accessible parking space in the parking area next to the ball field fence.**
- * Sign an accessible parking space by the path which leads to the left side opening of the tennis court.**
- * Improve by regrading the pathway from the gravel parking area to the left side opening of the tennis court. This pathway does not need to be paved, but should be a made a hardened, level surface a minimum of 36" wide for its entire length.**

General Note: In the future the Town may consider additional accessible parking spaces at all playground sites. The ADA does not require parking to be installed where not currently available. Also, the parks generally provide adequate accessibility across their respective grass surfaces. However, in future planning, paved pathways, though not required, would provide better access to playground facilities.

22. Conservation Areas

General Comments: The Town has the good fortune of owning and maintaining hundreds of acres of conservation land. Most of this land is used for passive recreation especially as walking trails. Most of the walking trails are not accessible and are maintained, but largely unimproved from there original cart path state. It would be prohibitively expensive to improve this extensive trail system sufficiently for it to be considered accessible. However, the Town can make a portion of these trails accessible. The recommendations below attempt to provide the services offered by the Town in its conservation areas accessible, not at all locations, but at some locations. It may be that individuals with disabilities object to being excluded from all Town owned conservation areas by virtue of not having all said areas improved and accessible. The Town would then argue quite justifiably that improving all such areas would represent an undue hardship upon the financial resources of the Town. The recommendations below allow provision of the services of walking trails and passive observation of the areas' natural beauty. No recommendations are made to enhance accessibility to any of the ponds in the conservation areas for ice or other fishing since that service is already accessible in one of the playgrounds discussed in the previous section of this report. The Town should strongly consider, in addition to these recommendations, adopting a policy which would necessitate all new conservation land acquisition be subject to appropriation of funds to make accessible the recreational services to be offered in the acquired land.

A. North Hill Wildlife Sanctuary

- * Sign an accessible parking space adjacent to the beginning of the trail to the pond.

- * Widen the entrance to the trail by the existing gate to a minimum of 36".

B. Frederick Knapp Town Forest

- * No recommendations

C. Round Pond Trails

- * No recommendations

D. Thaddeus Chandler Sanctuary

- * No recommendations

E. Trout Farm

- * No recommendations

F. Whiton Woods

- * **No recommendations**

G. Mill Pond

- * **No recommendations**

H. Peterson's Saw Mill Pond

- * **No recommendations**

I. Bay Farm

General Comments: This facility has been chosen to receive the few minor improvements necessary to provide more full accessibility. This facility was chosen because it is more easily made practically accessible at a reasonable cost and because it can be enjoyed passively by simply observing the vistas without traversing long distances over difficult terrain. With these improvements and proper maintenance of the trails the Town can provide "walking trails" as a service accessibly in this location.

- * **Sign an accessible parking space adjacent to the entrance to the pathway which leads to the field.**
- * **Cut back the grass adjacent to the kiosk to allow an individual using a wheelchair to approach the kiosk to obtain information.**
- * **Regrade the entrance to the pathway from the parking area to allow a level, hardened surface.**

23. Powder Point Bridge

General Comments: This bridge has been relatively recently reconstructed after being destroyed by fire. Its current construction allows practical accessibility. Certain modifications enumerated below are necessary to achieve full accessibility.

* The pedestrian access to either end of the bridge have been sloped to allow accessibility. The slope of these ramps is 12:1 and is therefore compliant with ADA regulation. However, the slopes must be 20:1 if rails are not to be installed and the ramp length exceeds six feet in length. Therefore, the Town must either add accessibly mounted railings on both sides of these ramps at either end of the sidewalk or reconstruct the ramps to a slope of 20:1 or less, thereby obviating the need for railings.

* A six inch wide yellow stripe should be added at the outside edge of the sidewalk for the entire length of the bridge.

24. Town Beach (lease)

General Comments: The service which the Town provides at this facility is not simply beach use, but also four wheel drive use and shellfishing. Shellfishing will be addressed in more detail in the section of the report entitled "Landings", but it should be noted here that it is extremely costly and probably impractical to attempt to provide accessible shellfishing anywhere. The expense and practicality at this location is significant. Therefore, an attempt to provide accessible shellfishing will be at another area and will not be recommended at this location. The nature of four wheel drive use allows inherent accessibility by the vehicle itself. Therefore, no modifications are advised or necessary to provide this service accessibly. The recommendations below will allow accessibility of the bathing beach for individuals with disabilities.

* Mark and sign a minimum of six additional accessible parking spaces in the paved parking area as adjacent as possible to the path over the dune that will be modified to be accessible.

* Construct an accessibly sloped boardwalk from the paved parking area over the crest of the dune towards the high tide mark. This boardwalk should be treated as a ramp and as such should be a minimum of 48" wide, should have accessibly mounted rails on each side, and should have level platforms five feet in length at 30' intervals. It would seem wise to construct this boardwalk in a fashion that is permanent for as short a length as possible, certainly not much beyond the crest of the dune. (The boardwalk should cease to have rails when it slopes less than 20:1.) The boardwalk from that point towards the beach should be constructed in pieces that are portable and may be removed and stored at the close of the season. It may be wise for the Town to end the board walk well above the high water mark and slope the

terminus of the boardwalk in such a way that it slopes accessibly into the sandy beach. The Town should strongly consider adding some portable beach mat which may be specially designed to allow accessibility over sand and into the water. These mats may extend into the water at least high tide to allow bathing.

Note: The Building Inspector interprets State Plumbing Code to require rest rooms at this facility due the number of parking spaces. The nine stall unit necessary would increase the cost of modifying this facility by approximately one hundred and twenty-five thousand dollars. This increased cost has been reflected in the full estimate on page four.

25. Shipyard Lane Beach

General Comments: This beach is for residents only. The services offered are bathing, shellfishing and boat landing. There is accessible shellfishing proposed to be offered by the Town at an alternate site. There are other boat landings which are more easily made accessible. The Town is proposing to modify at considerable expense its main beach to be accessible for bathing. Therefore, this site will not be a primary site for accessibility for any of the services which are otherwise available for individuals without disabilities. In light of that fact, the modification below provides only for accessibility for passive observation of the water.

*** Widen the openings in the fence to allow accessibility to the bench seating.**

26. Duxbury Beach Reservation

General Comments: This facility has not been modified to be accessible other than the addition of two accessible parking spaces and a ramp to the snack bar. The following list of recommendations will be necessary to be implemented to bring the facility to full ADA compliance.

*** Mark and sign an additional eight accessible parking spaces as adjacent as possible to the accessible walkway to the beach. The existing accessible spaces should be properly marked on the pavement.**

*** Construct an accessibly sloped boardwalk from the paved parking area over the crest of the dune towards the high tide mark. This boardwalk should be treated as a ramp and as such should be a minimum of 48" wide, should have accessibly mounted rails on each side, and should have level platforms five feet in length at 30' intervals. It would seem wise to construct this boardwalk in a fashion that is permanent for as short a length as possible, certainly not much beyond the crest of the dune. (The boardwalk should cease to have rails when it slopes less than 20:1.) The boardwalk from that point towards the beach should be constructed in pieces that are portable and may be removed and stored at the close of the season. It may be wise for the owner to end the board walk well above the high water mark and slope the terminus of the boardwalk in such a way that it slopes accessibly into the sandy beach. The owner should strongly consider adding some portable beach mat which may be specially designed to allow accessibility over sand and into the water. These mats may extend into the water at at least high tide to allow bathing.**

*** Construct an accessibly designed ramp from the platform level to the level of the entry door threshold. This ramp will be in excess of six feet in length and should therefore have accessibly mounted rails on both sides for the length of the slope. The ramp top**

platform should be five foot square and should allow a minimum clearance of 18" to the opening side of the entrance door.

* The telephone should be remounted on the platform to be of an accessible height of no greater than 54" to their highest operable part, should be equipped with volume control, and should be remounted to allow 36" of clear approach.

* Inaccessible entrances to the building should be signed as such directing traffic to accessible entrances.

* The entrance doors should be modified to have at least one of the pair a minimum of 36" wide.

* The men's and women's rest rooms should be modified to the following minimum specifications:

- a minimum 36" wide entrance door with a handle operable with a closed fist.
- install one accessibly mounted sink with faucet handles operable with a closed fist
- install one accessible toilet stall with accessible hardware
- install one accessible toilet in the accessible stall with a grab bar on the side and rear
- mount at least one mirror no higher than 40"
- mount all dispensers at a height no greater than 43"
- install one urinal accessibly mounted no higher than 15" in the men's room.

* a minimum of one shower in the women's rest room should be widened to have an entrance of no less than 36". There should be a seat accessibly mounted in the accessible shower stall, and a hand held shower nozzle with control accessibly mounted adjacent to the seat. The shower unit should be a minimum of 48" square.

* Either the shower floor should be raised or an accessible ramp should be constructed giving access to the men's shower floor. A seat should be added within the shower area, accessibly mounted with a hand held shower nozzle with controls mounted accessibly adjacent to the seat.

* The handles on the accessible entry doors to the concession area should be modified to be operable with a closed fist.

* A portion of the service counter should be lowered to a maximum height of 36" for a minimum of width of 36".

* Signs should be accessibly mounted and both visual and tactile which identify or direct individuals to the following:

- exits
- accessible rest rooms
- fire extinguishers

27. Town Pier Mattakeesett Court

General Comments: This facility presents an interesting dilemma in terms of accessibility. The parking lot is accessible. Access to the pier, itself, is fine. The slope of the gangplanks which lead to the docking facilities are accessible, but only during certain tides. The landing is as accessible as a boat landing can be made without pouring macadam into the water. The harbormaster shed is not accessible, but alternative accessibility is commonly provided outside the shed not only to individuals with disabilities, but to those without. (Oftentimes it is more convenient to provide all services outside the building since the building is small and the environment is frequently confusing due to staff and radio communication.) No recommendation is therefore made below to change the accessibility of the building, since alternative accessibility will continue to be conveniently accessible. The remainder of the recommendations below will allow full service accessibility for the pier.

* Add two additional accessible parking spaces properly marked on the pavement and signed one as adjacent as possible to the entrance to the pier and the other as close as possible to the landing.

* Place a sign on the harbormaster building indicating that accessible service provision is available outside the building upon request.

* Replace the gangway which leads to the front dock with one that is a minimum of 48" wide and which has foot stops beveled no higher than 1 1/2" with slopes of 12:1, and which has accessibly mounted rails on both sides.

* Post two signs adjacent or on the harbormaster building and adjacent to the accessible ramp which indicate that accessible landing and boat access is available during mid to high tides.

Note: The Building Inspector interprets State Plumbing Code to require rest rooms at this facility due the number of parking spaces. The four stall unit necessary would increase the cost of modifying this facility by approximately sixty thousand dollars. This increased cost has been reflected in the full estimate on page four.

28. Landings

General Comments: The Town has a large number of landings which are used for boat landings and to provide access to shellfishing areas. Most of the landings could not be easily made accessible for either shellfish access or boat landings for individuals with disabilities. Nevertheless, the Town should make an attempt to make these two services available to all of its users. One of the landings is recommended below to be modified to be at least more accessible for area shellfishermen. Modifications for shellfishing, to allow accessibility is not easy, inexpensive, nor is it necessarily effective. Therefore, only one area has been chosen. In many cases access to shellfishing areas is achieved with a four wheel drive vehicle. Modifying a site reached by a four wheel drive vehicle is nearly impossible and certainly impractical and not envisioned by the ADA regulations.

The service of boat landing is also difficult to provide for individuals with disabilities. Most sites could not be easily or inexpensively converted to be effectively accessible. However, modifications are recommended at the Town Pier which will allow boat landings to be accessible.

The following few recommendations are being made to attempt to make the services currently offered at the landings at least more practically accessible at at least one site operated by the Town.

A. Powder Point

* Construct an accessibly designed ramp from the accessible parking space to level of the gravel beach area. Install accessible matting to some distance into the flats.

B. Winsor St.

* No recommendations

C. Water St.

* No recommendations

D. Josselyn Ave.

* No recommendations

E. Howlands

* Mark and sign an accessible parking space as close as possible to the water's edge on the paved surface adjacent to the access road.

F. Clark Peterson's

*** No recommendations**

G. Hardin's Hill

*** No recommendations**

H. Bluefish River

*** No recommendations**

I. Anchorage Lane

*** No recommendations**

J. Cove St.

*** No recommendations**

K. Simeon Soule

*** No recommendations**

L. Bay Pond

*** No recommendations**

M. Landing Road

*** No recommendations**

29. Roadways

General Comments: The ADA requires that marked crosswalks should have accessible curb ramps or cuts where they intersect with curbs and sidewalks. Many curb cuts have been installed throughout the community. In some cases needs for curb cuts have been noted and recommended in sections of this report in conjunction with building recommendations. The following course of action is already in process for the community by the Department of Public Works and is recommended to be continued.

*** Undertake a complete inventory of locations where curb cuts are mandated at marked crosswalks.**

*** Continue the long term plan of constructing and improving curb ramps or cuts at required locations in the process of completing road improvements annually.**

30. Miscellaneous Buildings

General Comments: Title II of the ADA does not require that buildings which are not open to the public be modified to be accessible. Building improvements necessary to comply with Title I of the ADA are recommended to be so modified only if the test of "undue hardship" is undertaken by the Town. This process is detailed in a previous section of this report. The buildings referred to in this section are not currently open to the public nor do they require accessibility modification due to Title I (employment) need. Buildings that are not currently in use and will not in all likelihood be reopened for use are not required to be made accessible and do not therefore have a detailed compliance plan enumerated in this report.

There are therefore no recommendations for modifications of any public buildings which are not open to the public.

31. North Duxbury Fire Station

General Comments: This building is used by a non-public entity. The building is owned by the Town, and must therefore be made accessible if it is to continue to be used.

The first floor of the building can be modified to be accessible with relatively few changes. The rest room will need to be modified since it is used by the general public. The second floor of the building can not be made accessible without significant expense. The single internal stairway is insufficiently wide to accommodate the installation of a lift. The only effective mode to provide an accessible second floor is the installation of an elevator. If the Town wishes to allow the continued use of the second floor for its current purpose, the second floor must be made accessible. If the second floor of the building remains inaccessible, its use must not be public. Since the cost of making the second floor is prohibitively expensive, the recommendations below do not include an elevator to the second floor. These recommendations will allow the continued use of the first floor only.

* Mark on the pavement and properly sign an accessible parking space as close as possible to the main first floor access door.

* Install an accessibly designed ramp to the front door. This ramp should have accessibly mounted rails, and should culminate in a level platform level with the front door threshold. This platform should be constructed to allow a minimum of 18" of clearance to the opening side of the entry door.

* A paved walkway should be constructed at least 48" wide from the accessible parking space to the base of the accessible ramp to the front door.

* The main access door should be widened to at least 36" and should be modified to have a handle operable with a closed fist.

* The furniture within the first floor office area should be rearranged to allow access aisles of at least 36" with sufficient turning radii for a wheelchair.

* The rest room on the first floor should be modified to the following minimum specifications:

- an entry door of at least 36" in width with handles operable with a closed fist
- an accessibly mounted toilet with grab bars both to the rear and on one side
- an accessibly mounted sink with faucet handles operable with a closed fist
- access to the sink should be 36" wide and 48" deep
- the floor plan of the room should provide at least a 5' turning radii
- accessibly mounted fixtures, including a mirror mounted no higher than 40".
- an accessibly designed ramp should be installed to the rest room.

* Floor mats should be secured to the floor at all four edges.

(Note: If the second floor of the building is to be used an elevator should be installed from the first floor, a visual and audible alarm should be added to the second floor, rails should be accessibly mounted on both sides of the internal stairs, and furniture should be rearranged to allow accessible aisles.)