

***Town of Hubbardston Accessibility Plan  
June 2007***

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## I. INTRODUCTION

### Background

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

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

### Definition of Commonly Used Terms

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

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

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

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

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

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

### **Organization**

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

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

#### Introduction

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

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

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

- ADA education, notification and outreach
- developing program strategies to achieve community services compliance
- maintenance and upkeep of accessible features.

#### ADA Coordinator

The role of the ADA Coordinator is extensive and includes insuring overall compliance with the ADA; notification and outreach; addressing grievances as filed under the town's established grievance policy; insuring timely implementation of the town's transition plan; on-going assessment of programs and services and serving as a technical advisor and resource on accessibility matters. In order for the town to successfully comply with the intent of the ADA, it is critical that the appointed ADA Coordinator take a pro-active role in performing his/her role. It is not adequate for the ADA Coordinator to serve only as a decision-making authority under the town's ADA grievance procedure. The ADA Coordinator must monitor daily and long-term compliance with the town's ADA policies, procedures, and plans. This includes ADA compliance and assurance pertaining to postings, employment practices, education, dissemination of literature to the public and private businesses, daily activities and practices of town government, serving as a town-wide resource on accessibility matters and issues, and

staying current on changes in state and federal law, regulations, programs, policies, interpretations, and decisions which affect the disabled. The Hubbardston Building Inspector serves as the town's ADA Coordinator.

### **Education, Notification and Outreach**

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

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

### **Hiring and Employment Practices**

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

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

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

Although the ADA does not require an employer to have job descriptions, they can be used as evidence of the essential functions of the job.

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

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

### **Job Descriptions**

It appears that the town has revised most of its job descriptions for municipal employees. These job descriptions reflect a comprehensive description which includes "essential duties and responsibilities, essential training and experience required to perform essential functions and minimum physical and mental abilities required to perform essential functions. Job descriptions should also include a statement such as: *"In compliance with the Americans with Disabilities Act, the Town will provide reasonable accommodations to qualified individuals with disabilities and encourages both prospective and current employees to discuss potential accommodations with the Town"*. In addition, all advertisements for positions should include the following or a similar non-discrimination statement in its posting: *"The Town is an Equal Employment Opportunity/Affirmative Action Employer and does not discriminate on the basis of race, color, sex, national origin, religion or disability in employment or the provision of services"*.

### **ADA Grievance Procedure**

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

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

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

The Town of Hubbardston has a compliant ADA Grievance Procedure as required.

### Programs/Services

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

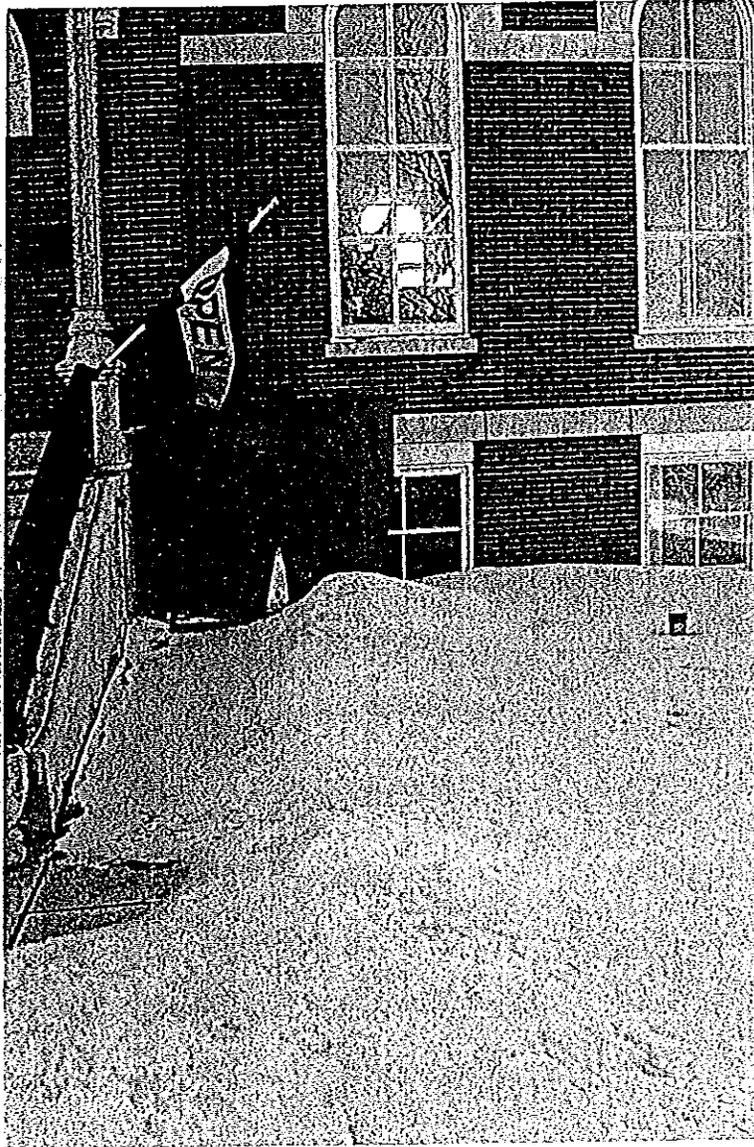
For example, a hearing impaired individual may want to attend a lecture on wetlands sponsored by the conservation commission. In addition to providing a sign-language interpreter, an acceptable accommodation may be to provide a copy of the lecture in print for the individual to read. This must be done at no cost to the individual. The town should also consider the purchase of either an assistive listening device (ASD) or a personal amplifier system to enable those with aural limitations to more effectively participate in public meeting settings. Currently town meetings are held at the elementary school. This facility complies with minimum accessibility standards pertaining to architectural barriers, however, ASD or similar devices should be considered. Access to the town's voting area within the elementary school is non-compliant.

### Maintenance and Upkeep

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

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

time of physical assessment as both the vertical lift and door openers were not working and the accessible route of travel to the lift was blocked with snow and ice.



Evaluation of Programs and Services

<u>Department</u>	<u>Programs/Services</u>	<u>Accessibility Issues</u>	<u>Current Actions</u>	<u>Needed Actions</u>
Highway Department	Maintenance of town public ways, public road sand/salt, issuing of driveway permits. Physical location of town recycling center.	The highway department building does not meet current accessibility requirements, but can be brought into full compliance with only minor modifications and improvements. Employees aware that program modifications may be necessary to assist the disabled. No formal policies in place. Communication practices both written and verbal.	Maintain public ways as required. Assistance upon request.	Provide any informational literature in large print format. Initiate construction improvements as detailed in Section IV.  Recycling center – provide directional and informational signage on requesting assistance. Brochure/handout about recycling center policies and services. Large print version available upon request
Fire Department	Emergency medical services, emergency management services, ambulance and fire response. Issuance of various permits under MGL 148. Response to miscellaneous public service needs and requests. Public education, brochures, handouts.	The fire department administrative building does not meet current accessibility requirements, but can be brought into full compliance with only minor modifications and improvements. No formal policies in place. Communication practices both written and verbal.	Assistance upon request.	Develop standard policies for handling requests for modifications and/or assistance. Provide any informational literature in large print format. Initiate construction improvements as detailed in Section IV.
Library	Book circulation, reading programs, educational services and programs, workshops.	Building accessibility requirements are not met. General maintenance and upkeep of accessible building components are required - modifications should be undertaken to insure full compliance with accessibility guidelines. No accessible bathrooms exist.	Audio books, CD Roms, CD's, videos, large print materials.	Develop formal ADA assistance policies and procedures. Initiate construction improvements as detailed in Section IV.

Slade Municipal Office Building:

The following departments/commissions/boards are located in the Slade Municipal Office Building, which serves as the primary location for general government activities in the Town of Hubbardston. Each of these, although substantially different in function, provide mostly administrative activities and primarily offer direct services to the general public who visit the respective office in the Slade Building. There are some commissions not specifically listed below such as the Historic Commission and others, which do not have full-time staff or regular office space but use the Slade Municipal Office Building to hold meetings or perform business. These commissions are subject to the same overall general building and service delivery concerns noted within this section. None of the town's departments have initiated any specific policies or procedures relative to individuals with disabilities. General postings and notices are made within the building relative to any building procedures and practices. Most department employees noted that although individual department policies and procedures are not in place, they are generally aware that program modifications may be necessary to assist the disabled. Public interaction occurs through direct communication, telephone mail, and e-mail. The building meets minimal accessibility standards. The bathroom in the municipal office portion of the building is not accessible. Similarly, the police department and COA/senior center have non-compliant bathrooms. In addition, there are numerous other areas of non-compliance throughout all portions of the entire building. Each department should develop standard policies for handling requests for modifications and/or assistance. Each department should also provide any informational literature in large print format. A TTY/TDD for building-wide use inclusive of the Town Hall Annex Building should be purchased and installed in the Office of the Board of Selectmen. In addition, an ALD or personal amplifier system should be purchased for use by those with aural limitations. Program accessibility will be achieved through the initiation of those construction improvements for the Slade Building as a whole and to individual offices as detailed in Section IV.

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|-------------------------|---|
| Police Department       | Emergency and police response and patrol. Issuance of firearms identification cards and license to carry firearms cards. Public education on safety, substance abuse, gun safety, elderly safety, children awareness, crime prevention, etc. Accident and criminal investigations. Information dissemination. Public interaction through person, telephone and mail. Emergency services dispatch inclusive of police, fire, ambulance, and related emergency services. Other assistance upon request. Develop standard policies for handling requests for modifications and/or assistance in the police department. Provide any informational literature in large print format. Initiate construction improvements as detailed in Section IV. |
| Conservation Commission | Conduction of public meetings and hearings on wetlands issues under MGL C.131 s.40. Issuance of orders of conditions and determinations of applicability. Response to various technical assistance and information requests pertaining to wetlands and conservation matters.  |
| Planning Board          | Deliberations and public meetings and hearings on subdivisions, plan approval not required plans, and site plan review applications. Provision of technical assistance on various land use, planning, and zoning matters.   |
| Board of Health         | Interpretation and enforcement of Title V of the State Environmental Code; inspections of food service establishments; health and safety inspections for residential and commercial properties; response to various technical assistance and information requests pertaining to health, safety, and septic system issues and concerns, assistance with the recycling center.  |
| Zoning Board            | Deliberations on special permits and variance requests; response to requests on zoning matters; conducts meetings hearings on appeals of decision of the Zoning Enforcement Officer.  |
| Building Inspector      | Interpretation and enforcement of the State Building Code; issuance of building and occupancy permits; oversight and coordination of electrical and plumbing inspection services, zoning bylaw enforcement officer; issuance of various written determinations and decisions; response to various technical assistance and information requests.  |

Council on Aging/Senior Center Weekly social events, workshops and programs; social security and health professional representatives; coordination of day trips and other entertainment; coordination of Tuesday and Thursday congregate meals; coordination of MART van services and other related services. The basement level kitchen area (cabinets, counters) used by the Council on Aging does not meet accessibility standards. Although access into the senior center is achieved, bathrooms do not meet accessibility standards. Develop standard policies for handling requests for modifications and/or assistance. Initiate construction improvements as detailed in Section IV.

Board of Selectmen/Town Administrator Issuance of certain licenses governing the sale of liquor, food, sales of motor vehicles, and entertainment; contract negotiation and oversight; oversight of support staff; liaison between town departments, boards and commissions; as chief elected officials - interact, contract, and resolve various state, federal, and local issues of concern.

Town Hall Annex

The following departments/commissions/boards are located in the Town Hall annex Building which is actually the ground level of the Hubbardston Public Library. With the exception of the Town Clerk, the remaining departments are primarily financial in nature and include the Assessors, Accountant, Treasurer, and Tax Collector. In addition, the Cemetery Commission and Parks and Recreation Commission use the meeting room in the Annex to conduct their meetings. These commissions do not have full-time staff or regular office space. These commissions are subject to the same overall general building and service delivery concerns noted within this section. None of these departments have initiated any specific policies or procedures relative to individuals with disabilities. Again, most department employees noted that although individual department policies and procedures are not in place, they are generally aware that program modifications may be necessary to assist the disabled. Public interaction occurs through direct communication, telephone mail, and e-mail. The building meets minimal accessibility standards. The exterior "drop box" is non-compliant due to the lack of a stable, hard, surface in front of the box. Access into the building is compromised due to vertical obstructions in the walkway and at the door entry. The "handicapped" bathroom does not meet current accessibility standards. In addition, there are numerous other areas of non-compliance throughout all portions of the annex including inadequate clear width space into office areas and excessive counter heights. Each department and/or commission should develop standard policies for handling requests for modifications and/or assistance. Each department/commission should also provide any informational literature in large print format. Program accessibility will be achieved through the initiation of those construction improvements for the Annex as a whole and to individual offices as detailed in Section IV.

Town Accountant Record keeping, account reconciliation, overall financial administration and oversight of the town's finances. Interaction/communication through mail, fax, telephone, and e-mail.

Tax Collector Collection of municipal taxes, assessments and other relevant fees.

Town Clerk Issuance of a variety state and town licenses, permits, and certificates; provision of information to the public on local and state government; voter registration and election assistance; provision of information on vital statistics and elections; provides certified copies of vital records; maintains annual town census. Note: The current town voting area within Hubbardston Elementary School is non-compliant and therefore services are not being fully made available to those with disabilities. This can be addressed through the initiation of construction improvements as detailed in Section IV.

Assessors Prepares annual tax recapitulation sheet; provides general real estate tax information; processes requests for abatements and exemptions; determines assessments on real estate, personal property, and vehicles; responds to requests for information.

Treasurer Responsible for employee benefits, payroll, administration of municipal finances; payment of bills/invoices, obtaining loans, involvement with various municipal cash management matters.

Cemetery  
Commission

Care and maintenance of the town's 12 cemeteries. Conduct burials, sale of grave lots, maintain cemetery deeds/records. Cemetery commission meetings are held in the Annex meeting room. Public interaction is through telephone and mail.

Parks and  
Recreation  
Commission

Comprised of representatives from other boards and commissions as well as 2 citizens at-large. Parks and Recreation provides guidance to the use, maintenance and improvements to the various town recreational facilities including the town common. Meetings are held in the Annex meeting room. It does not appear that the Parks and Recreation Commission have policies for handling requests for modifications and/or assistance nor is any literature on town facilities available in an alternate format. Note: Curtis Recreational Field, the town common and Elm Street Park are not compliant with current accessibility standards. This can be addressed through the initiation of construction improvements as detailed in Section IV.

## IV. ARCHITECTURAL BARRIERS (TRANSITION PLAN)

### Format

The Town of Hubbardston, in accordance with the Americans with Disabilities Act of 1990 (ADA) regulations, has surveyed its municipal buildings and facilities to document physical barriers to access as part of the requirements for developing a transition plan. The buildings and facilities which were assessed, as dictated by the town, include the Slade Building (municipal offices, police department, senior center), town office annex, library, highway department, fire department administrative office, town voting area, Curtis Recreation Field, town common and the town center sidewalks.

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

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

### Limitations of Transition Plan

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

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

### Recreational Facilities and Playgrounds

Recreational facilities and playgrounds must also comply with the Americans with Disabilities Act and the Massachusetts Architectural Access Board regulations (521 CMR). Existing sites where renovation is not yet planned must still meet the requirement of "program accessibility".

For example, the "program" of playgrounds or any services offered at that location must be accessible. The Federal Architectural and Transportation Barriers Compliance Board has issued final accessibility guidelines to serve as the basis for standards which are being adopted by the Department of Justice for new construction and alterations of play areas covered by the Americans with Disabilities Act. The guidelines include scoping and technical provisions for ground level and elevated play components, accessible routes, ramps and transfer systems, ground surfaces, and soft contained play structures. The guidelines are intended to insure that newly constructed and altered play areas meet the requirements of the ADA and are readily accessible to and useable by individuals with disabilities.

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

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

#### **Feasibility (F)**

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

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

#### **Priority (P)**

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

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

#### **Costs**

Cost estimates are based on projects of similar nature, unit quantity pricing (where appropriate), and R.S. Means Company, Inc. ADA Compliance Pricing Guide 2<sup>nd</sup> Edition (2004). Cost estimates are also based on the type and complexity of work. It is being assumed that simple

changes (Feasibility ranking of 1 or 2) will be made through the use of town personnel (custodial, highway, etc.). More complex construction or those projects requiring specialized skills (Feasibility ranking of 3 or 4), would involve private contractors and include labor, overhead, and profit.

### Use of the Transition Plan

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

### Some Basic Accessibility Requirements (ADAAG and 521 CMR AAB)

- Parking**
- 8' wide space w/minimum 5' wide access aisle for cars and 8' wide access aisle for vans
  - signage w/accessibility symbol
  - 8'2" minimum height clearance for van accessible spaces
  - hard, stable, slip-resistant surface w/a maximum cross-slope of 2% (1:50)
  - space(s) must be located on the shortest accessible route of travel to an accessible facility entrance
  - in general, 1 accessible space is required for every 25 total spaces
  - 1 in every 8 accessible spaces, but not less than 1 space shall be van accessible
- Accessible Route**
- hard, stable, firm, slip-resistant surface
  - 36" minimum width
  - walkways require a 48" minimum width w/a 36" minimum clear width
  - maximum 5% running slope (1:20)
  - maximum 2% cross-slope (1:50)
  - no objects between 27" and 80" above finish floor (a.f.f.) shall protrude more than 4" into the pathway
  - 60" x 60" passing space every 200' if pathway is less than 60" wide
  - handrails on both sides of pathway required if slope exceeds 5% (maximum 1:12 or 8.3% allowed)
- Ramps**
- maximum 8.3% running slope (1:12)
  - maximum length of a ramp run between landings shall not exceed 30'
  - 48" minimum clear width measured between the railings
  - slip resistant surface

- 
- base of ramp flush with adjacent hard and stable surface (i.e. pavement, concrete)
- 60" level area at base, all landings and top, as wide as the ramp
- 60" x 60" minimum landing wherever ramp changes direction
- continuous handrails on both sides, 1-1/4" to 1-1/2" in outside diameter, and round or oval in shape
- handrails must extend 12" beyond the top and bottom of the ramp
- handrails shall be provided in pairs, one at a height of 34" - 38" above the ramp surface and the lower handrail at a height between 18" and 20" and 1-1/2" from a wall or mounted surface

### **Curb Ramps**

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

### **Entryways**

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

### **Controls**

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

## Bathrooms

- General
  - slip resistant flooring
  - 60" diameter clear turning space
  - 30" x 48" clear space in front of sink
  - bottom of mirror shall be at a maximum of 40" a.f.f.
  
- Sink
  - maximum height of 34" to rim, minimum of 22" from wall to front of sink, minimum 27" clear knee space below rim, bowl depth not to exceed 6"; all pipes below sink must be wrapped; faucets must be operable with one hand or a closed fist; self-closing valves shall remain open for at least ten seconds.
  
- Dispensers
  - towel dispensers, drying devices and similar devices must be operable with one hand or a closed fist at a maximum height of 42" a.f.f.; toilet paper dispensers shall be at a minimum 24" a.f.f and within 36" of the rear wall
  
- Toilet
  - the centerline of the toilet shall be 18" from the nearest side wall and at least 42" from the farthest side wall; toilet seat shall be 17" to 19" a.f.f.; flush valve is to be on the approach side of the toilet
  
- Urinal
  - accessible urinals shall be stall-type or wall-hung with an elongated rim at a maximum height of 17" a.f.f.; flush valve on the approach side at a maximum height of 44" a.f.f.
  
- Grab Bars
  - 2 grabs 42" long, one located at the back wall and one located on the side wall; 1-1/4" to 1-1/2" in outside diameter with a clearance of 1-1/2" from the wall; non-rusting or acid-etched or roughened; capable of resisting 250 lbs. of force and set at a height of 33" to 36" a.f.f.

**Public Buildings: Slade Building**

**Name:** Slade Building

**Location:** Main Street

**Function:** Municipal building.

**Responsible Party:** Board of Selectmen

**General Description or Obstacle Which Limits Mobility or Access:** The Slade Building serves as multi-purpose municipal office building housing a number of town offices (building inspector, conservation commission, board of selectmen's secretary, town administrator, board of health, planning board), senior center and police department. Generally, the building is reasonably accessible, with a number of required modifications for full accessibility compliance. This includes minor interior program access limitations, non-compliant bathrooms, and other miscellaneous concerns. As a whole, accessible compliant signage does not exist. All offices have inappropriate door hardware to access individual departments or offices. Overall the interior of municipal administrative offices are accessible including the all-purpose meeting room. Similarly, the senior center has reasonable maneuverability but will require bathroom, kitchen area, rear entry (door, ramp, handrails, etc.) and other minor modifications for full compliance. The Police Department, which has a separate main entrance, shares similar concerns relative to bathroom, door entry, signage and door hardware. Most of the interior doorways are too narrow and some thresholds create abrupt and excessive changes in level surface. The lockers do not meet accessibility provisions but are limited for use only by departmental staff. Some of these areas of concern can be easily resolved through modifications, restricted use and reasonable accommodations as may be necessary.

**Description of Programs:** Administrative offices of general town government, senior center, police department.

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

**Estimated Total Project Cost:** Up to \$77,950

**Projected Completion Date:** December 2009

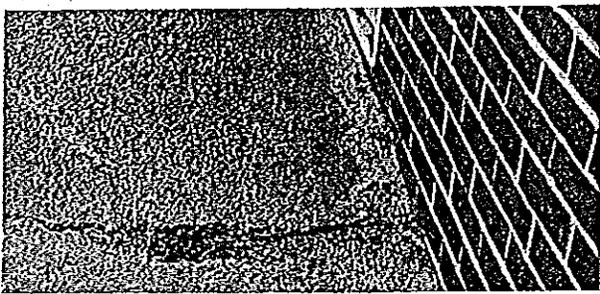
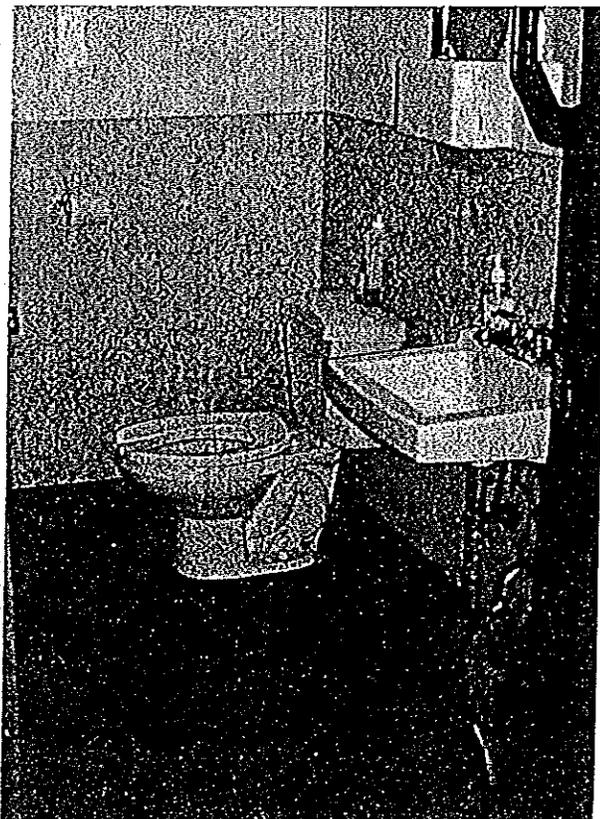
<u>General Description of Obstacle Which Limits Mobility or Access</u>	<u>ADAAG Compliance</u>	<u>MA 521 CMR Compliance</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>Cost Estimate</u>
<b><u>Municipal Offices and Parking</u></b>						
1. No van accessible signage provided.	S. 4.6	S. 23	Designate existing 8' wide (minimum) parking space w/ 8' wide access aisle as "van accessible" with appropriate signage. Sign height to be 5" minimum and 8" maximum a.f.f. to top of sign.	1	2	\$150
2. The accessible route (ramp and walkway) is compromised due to gaps in the cement ramp and up to a 1" differential in abrupt change in level surface. Only one handrail is provided with both top and bottom railing at heights 2" lower than allowed range..	S. 4.3 S. 4.5 S. 4.8	S. 20 S. 22 S. 24	Patch and repair cement walkway and ramp to maintain a level surface such that there are no changes greater than 1/4" in level surface. Erect new handrails on both sides of the ramp w/4' of clear space between the handrails. The handrails shall be continuous on both sides of the ramp, 1-1/4" to 1-1/2" in outside diameter, and round or oval in shape; handrails to be provided in pairs, one at a height of 34" - 38" above the ramp surface and the lower handrail at a height between 18" and 20"; handrails to be 1-1/2" from the mounted surface; handrails should extend 12" beyond the bottom of the ramp.	1	4	\$3,500
3. Interior door hardware to roughly 5 offices and work area are knob-style and non-compliant. Hardware should be easily operable by one hand or a "closed fist".	S. 4.13	S. 26	Replace door hardware with lever-type hardware or other accessible compliant hardware.	2	2	\$500
4. Lack of interior accessible signage to the various offices.	S. 4.30	S. 41	Install accessible compliant signage with appropriate finish and contrast and character height and proportions. Raised and Brailled characters should also be included. Signage should be mounted at 60" a.f.f. o.c. adjacent to the latch side of the door(s).	2	1	\$300

**Municipal Offices and Parking cont'd**

5. Unisex bathroom – lack of turning radius due to size of room; lack of accessible signage; the towel dispenser is mounted at 49" a.f.f. which exceeds the height requirement; no grab bars exist; the water closet is wholly non-compliant in regards to height, set-back, clearance and approach requirements; the sink is non-compliant due to approach and is not wrapped below; mirror height is too high; no audible and visual alarm is provided.
- S. 4.13 S. 30  
S. 4.16 S. 41  
S. 4.18  
S. 4.19  
S. 4.24  
S. 4.26  
S. 4.27  
S. 4.28  
S. 4.30

Expand existing bathroom area to construct a fully compliant accessible bathroom to comply with the following; **signage** – install accessible compliant signage with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included, signage should be mounted at 60" a.f.f.; **door** – adjust door closer to meet the six second maximum closing speed and 5 lbs. push/pull force thresholds; **sink** – maximum height of 34" to rim, minimum of 22" from wall to front of sink, minimum 27" clear knee space below rim, bowl depth not to exceed 6"; all pipes below sink must be wrapped; faucets must be operable with one hand or a closed fist; self-closing valves shall remain open for at least ten seconds; **dispensers** – towel dispensers, drying devices and similar devices must be operable with one hand or a closed fist at a maximum height of 42" a.f.f.; toilet paper dispensers shall be at a minimum 24" a.f.f. and within 36" of the rear wall; **toilet** – the centerline of the toilet shall be 18" from the nearest side wall and at least 42" from the farthest side wall; toilet seat shall be 17" to 19" a.f.f.; flush valve is to be on the approach side of the toilet; **grab bars** – 2 grabs 42" long, one located at the back wall and one located on the side wall; 1-1/4" to 1-1/2" in outside diameter with a clearance of 1-1/2" from the wall; non-rusting or acid-etched or roughened; capable of resisting 250 lbs. of force and set at a height of 33" to 36" a.f.f.; **general** – slip resistant flooring, 60" diameter clear turning space, 30" x 48" clear space in front of sink, bottom of mirror shall be at a maximum of 40" a.f.f.; install audible and visual alarm; coat hook at max. 54" a.f.f.

3 4 \$17,500



**Senior Center**

1. Small kitchen has range hood and controls which exceed maximum 54" height requirement. Countertop exceeds maximum height requirement of 34" by 2".
- S. 4.2 S. 32
2. The wall mounted coat rack has hooks which are 59" and 62" a.f.f. o.c. which exceeds the maximum 54" a.f.f. for a side approach.
- S. 4.2 S. 34

Replace range hood such that the bottom height and controls do not exceed 54" a.f.f. If required, request a variance on height of existing countertops.

4 3 \$350

Install additional coat hook and wall mount no greater than 54" a.f.f.

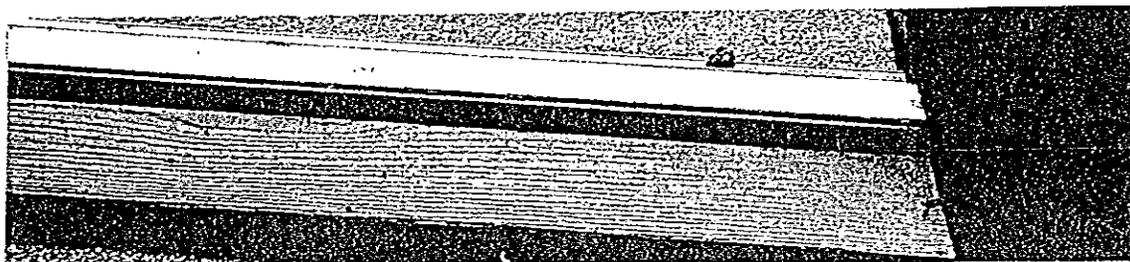
4 2 \$50

Senior Center continued

<p>3. Unisex bathroom – lack of turning radius, clearance and setback requirements due to size of room; lack of accessible signage; no towel dispenser; no coat hook; the grab bars do not comply with the length requirement; the water closet does not meet the sidewall setback requirement; mirror height is too high; the toilet paper dispenser exceeds the maximum 36" rear wall set back requirement by 2"; no audible and visual alarm is provided.</p>	<p>S. 4.13 S. 4.16 S. 4.19 S. 4.24 S. 4.26 S. 4.27 S. 4.28 S. 4.30</p>	<p>S. 30 S. 41</p>	<p>Expand existing bathroom area to construct a fully compliant accessible bathroom to comply with the following: <u>signage</u> – install accessible compliant signage with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included, signage should be mounted at 60" a.f.f.; <u>door</u> - adjust door closer to meet the six second maximum closing speed and 5 lbs. push/pull force thresholds; <u>sink</u> - maximum height of 34" to rim, minimum of 22" from wall to front of sink, minimum 27" clear knee space below rim, bowl depth not to exceed 6"; all pipes below sink must be wrapped; faucets must be operable with one hand or a closed fist; self-closing valves shall remain open for at least ten seconds; <u>dispensers</u> - towel dispensers, drying devices and similar devices must be operable with one hand or a closed fist at a maximum height of 42" a.f.f.; toilet paper dispensers shall be at a minimum 24" a.f.f. and within 36" of the rear wall; <u>toilet</u> - the centerline of the toilet shall be 18" from the nearest side wall and at least 42" from the farthest side wall; toilet seat shall be 17" to 19" a.f.f.; flush valve is to be on the approach side of the toilet; <u>grab bars</u> - 2 grabs 42" long, one located at the back wall and one located on the side wall; 1-1/4" to 1-1/2" in outside diameter with a clearance of 1-1/2" from the wall; non-rusting or acid-etched or roughened; capable of resisting 250 lbs. of force and set at a height of 33" to 36" a.f.f.; <u>general</u> - slip resistant flooring, 60" diameter clear turning space, 30" x 48" clear space in front of sink, bottom of mirror shall be at a maximum of 40" a.f.f.; install audible and visual alarm; coat hook at max.. 54" a.f.f.</p>	<p>3 4 \$17,500</p>
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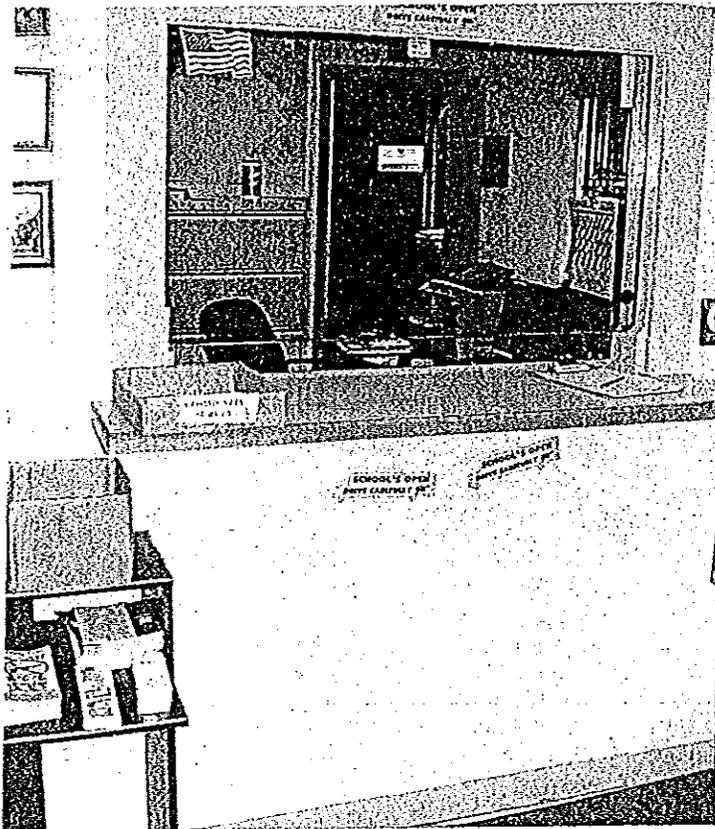
<p>4. The existing handrails on the side door stairs do not comply the minimum 12" handrail extension beyond the bottom of the stairs. Handrails provided only on one side of stairs.</p>	<p>S. 4.9</p>	<p>S. 27</p>	<p>Install additional handrail and extend existing hand railings 12" beyond bottom step.</p>	<p>1 3 \$900</p>
<p>5. Non-compliant rear door (ramp) closing speed and push/pull force. The closing speed of 3 seconds is too fast and the push/pull force of 16 lbs. is too great.</p>	<p>S. 4.13</p>	<p>S. 26</p>	<p>Adjust the door closers such the 6 second minimum closing speed and the maximum 15 lbs. push/pull force is achieved.</p>	<p>2 2 \$100</p>
<p>6. Rear door threshold is not beveled and has a height of 1/2" and 1" which exceeds the allowable vertical floor surface tolerance of 1/2" with a 1:2 slope..</p>	<p>S. 4.5</p>	<p>S. 29</p>	<p>Modify and/or replace existing threshold with a beveled threshold of not more than 1/2" in height and a 1:2 slope.</p>	<p>2 3 \$300</p>



Hubbardston Accessibility Plan

**Police Department**

1.	Non-compliant exterior door closing speed.	S. 4.13	S. 26	The entry door has a closing speed of 4 seconds and requires adjusting to comply with the minimum 6 second closing speed requirement.	1	2	\$100
2.	Non-compliant interior door mats and carpets.	S. 4.5	S. 29	The front entry as well as the department interior contains floor mats which detract from providing a stable, firm, slip resistant surface. These floor mats should be removed.	2	1	\$0
3.	Entry door threshold is not beveled and has a height of 1 1/4" which exceeds the allowable vertical floor surface tolerance of 1/2" with a 1:2 slope.	S. 4.5	S. 29	Modify and/or replace existing threshold with a beveled threshold of not more than 1/2" in height and a 1:2 slope.	2	3	\$400
4.	The counter height at the dispatch window is constructed at 43" a.f.f., which exceeds maximum height requirements by 9".	S. 4.32	S. 7	Construct a minimum 36" wide counter below the dispatch window with a maximum height of 34" and a minimum of 27" knee clearance.	2	3	\$400
5.	Inadequate clear width space of the accessible route of travel into the department due to a display table. The latter restricted to only 27 1/2".	S. 4.3	S.20	Rearrange and/or remove display table to increase the clear width space to at least 36" within the interior accessible route of travel.	2	1	\$0
6.	Existing unisex public bathroom is wholly non-compliant.	S. 4.13 S. 4.16 S. 4.19 S. 4.24 S. 4.26 S. 4.27 S. 4.28 S. 4.30	S. 30 S. 41	Renovate existing bathroom area into a fully compliant accessible bathroom to comply with the following: <u>signage</u> - install accessible compliant signage with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included, signage should be mounted at 60" a.f.f.; <u>door</u> - adjust door closer to meet the six second maximum closing speed and 5 lbs. push/pull force thresholds; <u>sink</u> - maximum height of 34" to rim, minimum of 22" from wall to front of sink, minimum 27" clear knee space below rim, bowl depth not to exceed 6"; all pipes below sink must be wrapped; faucets must be operable with one hand or a closed fist; self-closing valves shall remain open for at least ten seconds; <u>dispensers</u> - towel dispensers, drying devices and similar devices must be operable with one hand or a closed fist at a maximum height of 42" a.f.f.; <u>toilet</u> paper dispensers shall be at a minimum 24" a.f.f and within 36" of the rear wall; <u>toilet</u> - the centerline of the toilet shall be 18" from the nearest side wall and at least 42" from the farthest side wall; toilet seat shall be 17" to 19" a.f.f.; flush valve is to be on the approach side of the toilet; <u>grab bars</u> - 2 grabs 42" long, one located at the back wall and one located on the side wall; 1-1/4" to 1-1/2" in outside diameter with a clearance of 1-1/2" from the wall; non-rusting or acid-etched or roughened; capable of resisting 250 lbs. of force and set at a height of 33" to 36" a.f.f.; <u>general</u> - slip resistant, stable, hard flooring, 60" diameter clear turning space, 30" x 48" clear space in front of sink, bottom of mirror shall be at a maximum of 40" a.f.f.; install audible and visual alarm; coat hook at max. 54" a.f.f.	3	4	\$15,000



Hubbardston Accessibility Plan

**Police Department continued**

7.	Interior door hardware to 2 administrative offices, booking room (2 entryways) and dispatch are knob-style and non-compliant. Hardware should be easily operable by one hand or a "closed fist".	S. 4.13	S. 26	Replace door hardware with lever-type hardware or other accessible compliant hardware.	2	2	\$500
8.	Inadequate clear width space of doorway. Doorways to the dispatch area, 2 administrative offices and the booking room have only 28" of clear width space which does not meet the 32" required minimum.	S. 4.13	S.26	Modify existing doorways and doors through a combination, as appropriate, including the installation of reverse swing doors, replacement of existing hinges with swing-clear hinges or widening the doorway.	2	3	Up to \$5,000
9.	Door threshold to sergeant's office is not beveled and has a height of 1 3/4" which exceeds the allowable vertical floor surface tolerance of 1/2" with a 1:2 slope.	S. 4.5	S. 29	Modify and/or replace existing threshold with a beveled threshold of not more than 1/2" in height and a 1:2 slope.	2	3	\$400
10.	Existing unisex bathroom is wholly non-compliant.	S. 4.13 S. 4.16 S. 4.19 S. 4.26 S. 4.27 S. 4.30	S. 30 S. 41	Renovate existing bathroom area into a fully compliant accessible bathroom to comply with the following: <b>signage</b> - install accessible compliant signage with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included, signage should be mounted at 60" a.f.f.; <b>door</b> - adjust door closer to meet the six second maximum closing speed and 5 lbs. push/pull force thresholds; <b>sink</b> - maximum height of 34" to rim, minimum of 22" from wall to front of sink, minimum 27" clear knee space below rim, bowl depth not to exceed 6"; all pipes below sink must be wrapped; faucets must be operable with one hand or a closed fist; self-closing valves shall remain open for at least ten seconds; <b>dispensers</b> - towel dispensers, drying devices and similar devices must be operable with one hand or a closed fist at a maximum height of 42" a.f.f.; toilet paper dispensers shall be at a minimum 24" a.f.f and within 36" of the rear wall; <b>toilet</b> - the centerline of the toilet shall be 18" from the nearest side wall and at least 42" from the farthest side wall; toilet seat shall be 17" to 19" a.f.f.; flush valve is to be on the approach side of the toilet; <b>grab bars</b> - 2 grabs 42" long, one located at the back wall and one located on the side wall; 1-1/4" to 1-1/2" in outside diameter with a clearance of 1-1/2" from the wall; non-rusting or acid-etched or roughened; capable of resisting 250 lbs. of force and set at a height of 33" to 36" a.f.f.; <b>general</b> - slip resistant, stable, hard flooring, 60" diameter clear turning space, 30" x 48" clear space in front of sink, bottom of mirror shall be at a maximum of 40" a.f.f.; install audible and visual alarm; coat hook at max.. 54" a.f.f.	3	4	\$15,000



**Public Buildings: Town Voting Area**

Name: Hubbardston Elementary School Library

Location: Main Street

Function: Town Voting Area

Responsible Party: Town Clerk

**General Description or Obstacle Which Limits Mobility or Access:** The town's polling/voting location is wholly non-compliant. The voting area is served by on-street parking only. No accessible curb ramp exists to the sidewalk leading to the voting area entrance. The "accessible route" consists of excessive gaps in the concrete walkway and ramp, a 1/2" to 2" change in level surface occurs at numerous locations on the concrete ramp to the library entrance. Inadequate width exists between the ramp handrails leading to the voting area entrance. The voting area entrance is noncompliant due to the closing speed of the door, push/pull force of the door and threshold.

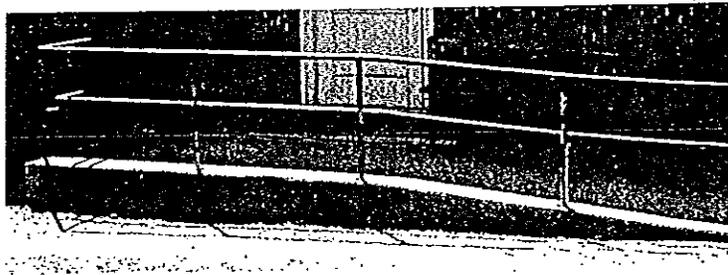
**Description of Programs:** Town voting.

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

**Estimated Total Project Cost:** \$23,000+

**Projected Completion Date:** June 2009

<u>General Description of Obstacle Which Limits Mobility or Access</u>	<u>ADAAG Compliance</u>	<u>MA 521 CMR Compliance</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>Cost Estimate</u>
1. No curb cut exists from the designated on-street "accessible" parking to the walkway leading to the town voting area.	S. 4.7	S. 21	Create a compliant curb ramp along with an accessible drop-off area.	1	3	\$2,500
2. The accessible route (ramp and walkway) is compromised due to numerous gaps in the surface including up to a 2" "gap" and numerous and up to a 2" differential in abrupt change in level surface. A storm drain exists within the accessible route with 1 3/4" openings (1/2" allowed). Furthermore the manhole cover is set with a 1/4" abrupt change in elevation on the ramp surface. Inadequate width between handrails of ramp. Handrails need to be sanded and repainted.	S. 4.3 S. 4.5 S. 4.7 S. 4.8	S. 20 S. 21 S. 22 S. 24	Patch and repair sidewalk to ramp to maintain a level surface such that there are no changes greater than 1/4" in level surface. Construct a new ramp w/4' of clear space between handrails. The handrails shall be continuous on both sides of the ramp, 1-1/4" to 1-1/2" in outside diameter, and round or oval in shape; handrails to be provided in pairs, one at a height of 34" - 38" above the ramp surface and the lower handrail at a height between 18" and 20"; handrails to be 1-1/2" from the mounted surface; handrails should extend 12" beyond the bottom of the ramp. The ramp shall not exceed a running slope of 8.3% nor a 2.0% cross-slope. A 60" x 60" level area at the ramp base and top is required. Replace existing storm drain manhole cover with such that openings are no greater than 1/2".	1	4	\$20,000+
3. Non-compliant entry door closing speed and push/pull force. The closing speed is approximately 4 seconds while the push/pull force is greater than 15 lbs.	S. 4.13	S. 26	Adjust the door closer such that the 6 second minimum closing speed and the maximum 15 lbs. push/pull force is achieved.	1	2	\$100
4. The entry threshold between is 1/2" unbeveled on the exterior and 1" high on the interior - both which exceed the allowable vertical floor surface tolerance of 1/2".	S. 4.5	S. 29	Replace or modify existing threshold with a beveled threshold of not more than 1/2" in height and a 1:2 slope.	1	3	\$400



### **Public Ways: Sidewalks and Curb Ramps**

**Name:** Sidewalks and curb ramps.

**Location:** Town center.

**Description of Facility:** Public ways - sidewalks and curb ramps along Elm Street (to elementary school); Main Street and portions of High Street; Gardner Road and Worcester Road (Route 68).

**Function:** Pedestrian access within public ways.

**Responsible Party:** DPW

**General Description or Obstacle Which Limits Mobility or Access:** A site assessment was conducted of the town's sidewalks and curb ramps in the town center, specifically Main Street and portions of Elm Street, Gardner Road, Worcester Road and High Street. Regardless of the documented areas of non-compliance, the town must comply according to the stricter of the ADAAG, 521 CMR, or Massachusetts Highway Department Wheelchair Ramp Standards, whichever is appropriate. In addition, a minimum clear width of 36" on an accessible route of travel must be maintained. This includes a minimum of 80" of clear headroom. Specifically, the conditions of the town's sidewalks and curb ramps of the town center were assessed. Photographic documentation is provided which demonstrates both common problems and serious concerns.

#### **Visual Assessment**

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

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

#### **Required Standards**

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

#### **Standard**

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

- Running slopes of walkways should not exceed 5% (wherever practicably feasible for sidewalks) and cross slopes should not exceed 2%.
- Walkway surfaces shall be stable and firm and shall lie generally in a continuous plane with a minimum of surface warping.
- Walkways should have a continuous common surface not interrupted by steps or changes in level greater than 1/4".
- All sidewalks/accessible routes of travel must be maintained and kept in a good quality condition including being kept free of snow and ice or other debris which would restrict access.

#### Summary of Conditions

The majority of the curb ramps and many of the sidewalks in the central business district do not comply with state and federal accessibility requirements. In fact, in most sidewalk and driveway crossings, curb ramps do not exist creating a non-compliant change in level greater than 1/4". In numerous cases, granite or asphalt curbing on sidewalk crossings or crosswalks create a 4" or greater vertical obstructions. In addition, most sidewalks are severely deteriorated and are unstable, not level and wholly non-compliant. In many areas, concrete sidewalks are nearly impassable due to extreme displacement and the creation of uneven and unsafe conditions. Drain manhole covers within the sidewalk on Worcester Road further restrict the accessible route due to raised "covers" resulting in non-compliant vertical obstructions.

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

#### *Worcester Road (cemeteries) to Elm Street*

- Cross-slope of bituminous concrete sidewalk in vicinity of Rural Glen Cemetery varies up to 6.6%.
- No curb ramps exist to cross cemetery entrances from the Worcester Road sidewalk. Four curb ramps are required. [1]
- A 2" abrupt change in level surface of the sidewalk exists on both sides of the bridge. [2]
- No curb ramps exist to cross the driveway of #28 Worcester Road from the sidewalk. Two curb ramps are required.
- No curb ramps exist to cross the driveway of #24 Worcester Road from the sidewalk. Two curb ramps are required.
- Accessible route of travel is restricted along the sidewalk from approximately #24 Worcester Road to Elm Street due to drain manhole covers within the sidewalk at five different locations which restrict the accessible route of travel to less than 30" in some locations due to 2" abrupt change in level surface. [3]
- Overall condition of Worcester Road sidewalk is in very poor condition due to a deteriorated, uneven and unstable surface. [4]
- No curb ramp exists to cross Elm Street from the Main Street/Worcester Road sidewalk. Two curb ramps are required. [5]

#### *Elm Street to Main Street/Gardner Road (ending at High Street)*

- Overall condition of the Main Street concrete sidewalk near Elm Street is in very poor condition due to a deteriorated, uneven and unstable surface. [6]
- No curb ramp exists at crosswalk from school/library crossing Main Street to the town common. Crosswalk on town common side enters into a driveway. Two curb ramps are required.
- No curb ramp exists at crosswalk from Slade Building to the post office. Two curb ramps are required.
- No curb ramp exists at crosswalk near library and to access town voting area.
- Lack of a firm, hard, stable surface (sidewalk) at crosswalk location leading to High Street.

- Overall condition of the bituminous concrete (asphalt) and concrete sidewalk on the municipal complex side of Main Street is in very poor condition due to a deteriorated, uneven and unstable surface including an abrupt change in level surface of greater than 2". [7, 8]
- No curb ramps exist to cross driveways on post office side of Main Street.
- Severe deterioration of sidewalk in front of Uncle Mike's store and gas station resulting in is in an uneven and unstable surface including abrupt changes in level surface of greater than ¼". [9]

*Elm Street*

- Overall condition of the bituminous concrete (asphalt) and concrete sidewalk on Elm Street leading to the elementary school is in very poor condition due to a deteriorated, uneven and unstable surface including an abrupt change in level surface of greater than 2". [10].

*High Street*

- Overall condition of the primarily concrete with some bituminous concrete (asphalt) sidewalk on High Street is in very poor condition due to a deteriorated, uneven and unstable surface including abrupt changes in level surface of greater than ¼" and a cross-slope at one location of 8.7%.

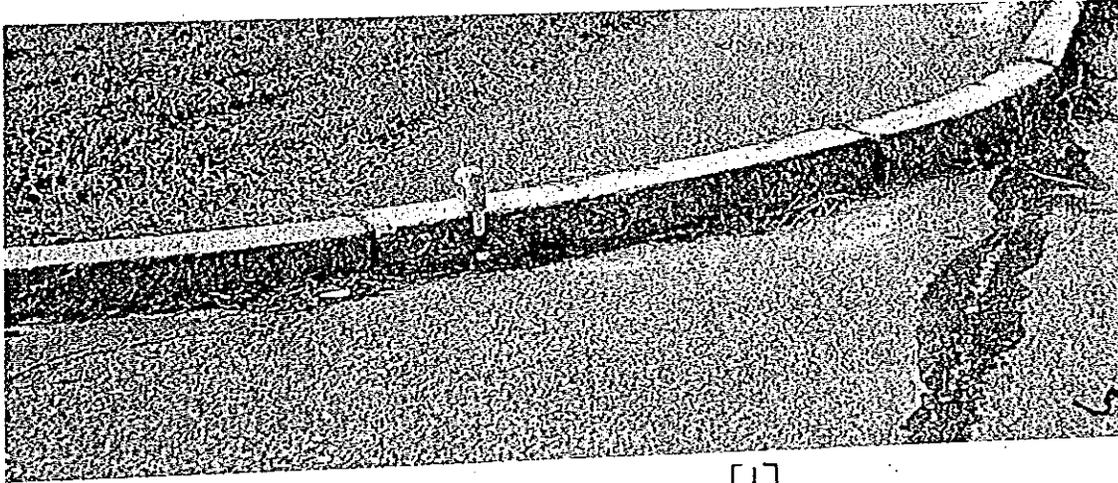
**Description of Programs:** Vehicular and pedestrian right-of-way.

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

**Estimated Total Project Cost:** Total costs range from roughly \$166,000 to \$264,000 depending on the extent of rehabilitation, materials used, design and construction monitoring, extent of in-kind contributions (force labor, etc.), etc.

**Projected Completion Date:** November 2010.

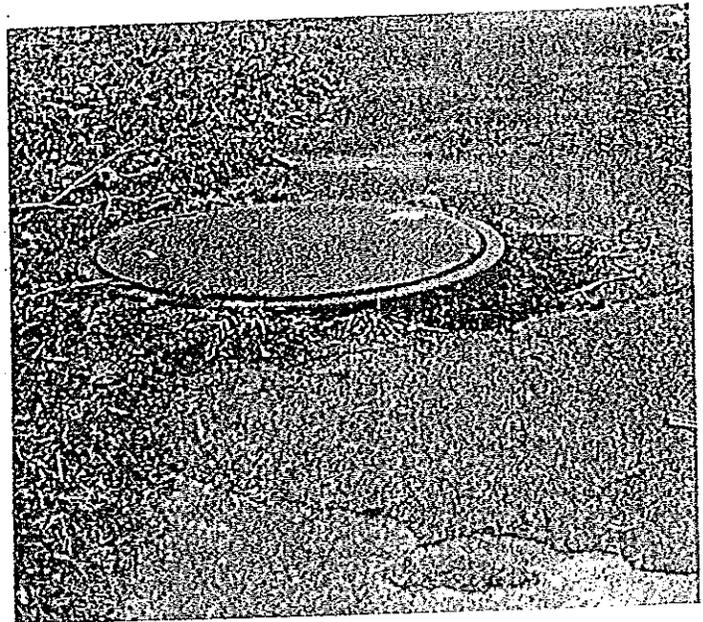
Photographic Examples of Sidewalk and Curb Ramps in the Town Center



[1]

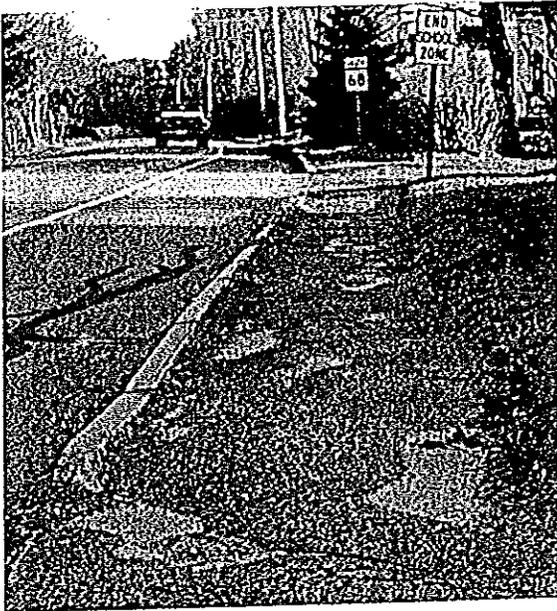


[2]

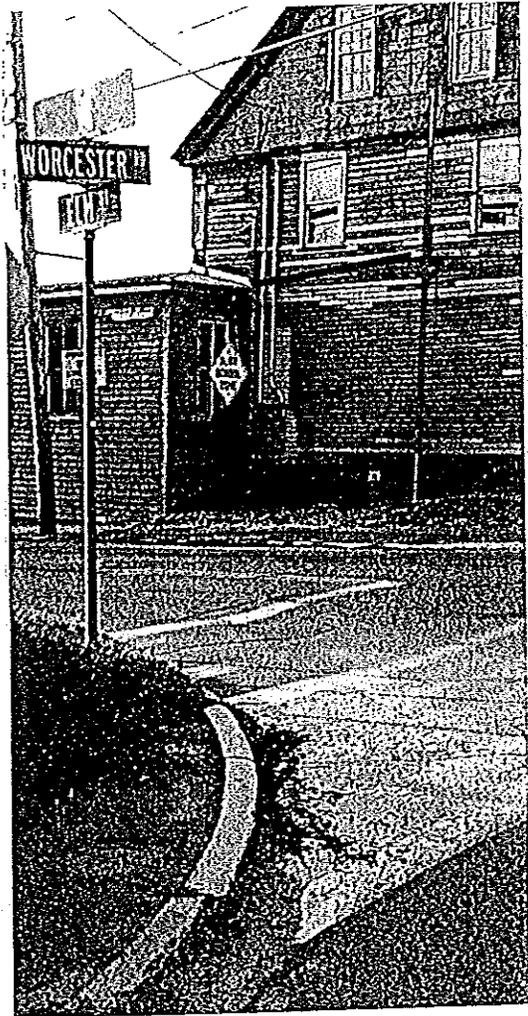


[3]

Photographic Examples of Sidewalk and Curb Ramps in the Town Center (cont'd)



[4]



[5]

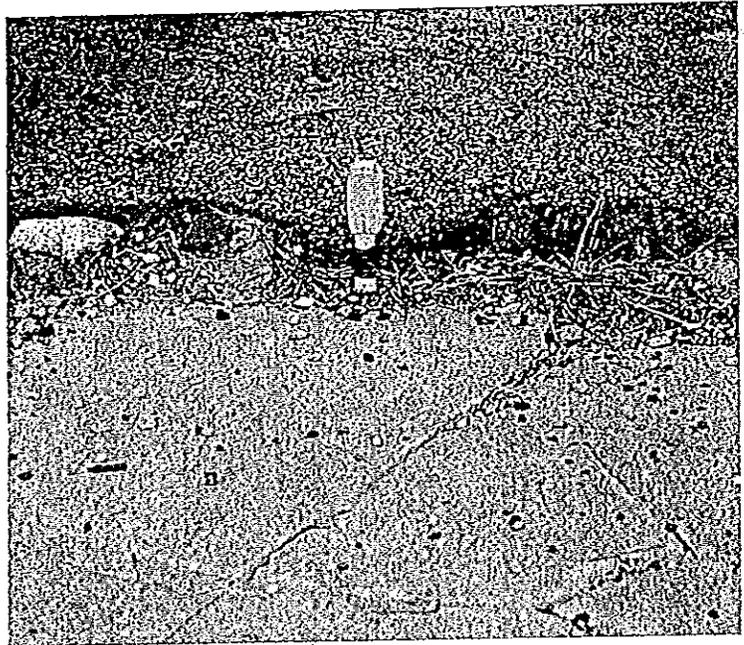


[6]

Photographic Examples of Sidewalk and Curb Ramps in the Town Center (cont'd)



[7]



[8]



[9]



[10]

## VI. SUMMARY

### General

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

### Programs and Services

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

### Architectural Barriers

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

<u>Facility Type</u>	<u>Total Estimated Cost</u>
Public Buildings	Up to \$341,015+
Public Ways	Up to \$264,000+
Public Areas	Up to \$19,500+
Parks and Recreation Facilities	Up to \$72,050+
Total	Up to \$696,565+

### Policies and Procedures

The town does not have all the recommended policies and procedures pertaining to the ADA, program accessibility and communications. As part of this Accessibility Plan, model policies and procedures are provided to address those "missing" areas, which can be adapted more specifically by the town for its own use. The adoption of these policies and procedures may also require specific actions by the town including developing partnerships with other agencies and organizations, employee training, implementation of specific practices, and the purchasing of equipment.

**Recommendations**

- Continue to maintain job descriptions for town employees which include and clearly describe the essential functions of each position as well as any necessary physical requirements.
- Adopt policies pertaining to non-discrimination, employment, equal opportunity, and effective communication (See Appendices C, D, E, and F).
- Formalize any "informal practices" pertaining to providing assistance or access to programs and services. This should include postings and the publication of the same in a written format. As a matter of practice, the town's ADA related procedures and policies should be published in the Town Annual Report and on the Town's website.
- Purchase and install a teletypewriter (TTY) or telecommunication device for the deaf (TDD) for use in the selectmen's office to allow a centralized communication point to town services (Estimated cost of \$350).
- Purchase and install an assistive listening device (ASD) or a personal amplifier system to enable those with aural limitations to more effectively participate in public meetings (Estimated cost of \$2,500).
- Undertake required changes in policies and procedures as well as structural modifications to insure that all public elections and all public meetings, including town meetings, are in full compliance with equal and full access requirements.
- Remove architectural barriers as identified in Section IV of this Accessibility Plan.

***APPENDICES***

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